

London Assembly Planning and Housing Committee
Beyond Consultation: The Role of Neighbourhood Plans in Supporting Local Involvement in Planning

Combined Evidence Received

Investigation: Beyond Consultation: The Role of Neighbourhood Plans in Supporting Local Involvement in Planning

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NBH001 [Member of the Public]

Sent: 23 July 2011 20:51

To: Alexandra Beer

Subject: Neighbourhood planning

Dear Alexandra,

I heard about the request for thoughts on neighbourhood planning in the Purley Mail.

It is an interesting idea and great for people to be shaping their communities.

I have two reservations

1 - the people who generally have the time to be involved are often retired, and might tend to have similar views, which may or may not be in line with the rest of their community. Many of the community might not have the time to get involved (I am a mother of two young children, who is pretty time poor, as I am already involved in quite a bit locally, and am limited time-wise as I have two dependents).

2 - I am concerned that issues like mitigating and adapting to climate change and reducing carbon emissions in line with the UK's legally binding targets, which are vitally important to take into consideration in planning may not be a concern or priority for some residents, possibly even some of the demographic described in my first point.

I'm not sure if the feedback above is the kind you are looking for? If not, I apologise! Thank you for trying to find out what communities think.

With kind regards,

..

..
NBH002 James Derounian [University of Gloucester]

Sent: 25 July 2011 12:13

To: Alexandra Beer

Cc:

Subject: Community Involvement in Planning

Hallo Alexandra,

Here are suggestions for your inquiry & work:

The following have long experience of participatory working with communities (in relation to planning matters):

- []written recently on the topic for ResPublica: 'Civic Limits' report
- Involve <http://www.involve.org.uk/>
- – nef
- CDX
-

I also recommend you pick up on participatory initiatives from around the country e.g.:

- Action with Communities in rural England ACRE,
- The Royal Town Planning Institute...see their Neighbourhood Planning briefings... []
- Take a look also at thousands of individual 'Parish Plans' produced around England
- Planning Aid Service go via [] again

There's lots more to say!!

James Derounian BSc (Hons) MPhil MRTPI FHEA FILCM
Principal Lecturer in Community Development and Local Governance,
National Teaching Fellow,
University of Gloucestershire,
Department of Natural & Social Sciences,
Cheltenham

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NBH003 Camden Civic Society

. Sent: 25 July 2011 18:13

To:

Subject: Re: London Assembly Review of Community Involvement in Planning in London

Follow Up Flag: NBH003_Camden Civic Society -Request for extension

Chairman

Camden Civic Society.

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NBH004 Haringey Federation of Residents Associations [HFRA]

Sent: 25 July 2011 18:35
To: Michael Walker; Alexandra Beer
Subject: Re: FW: London Assembly Review of Community Involvement in Planning in London

Follow Up Flag: NBH004_HFRA
Flag Status: Blue

Attachments: HFRAplanningConference2010report6pp.doc; HFRAlondonplanningpolicies12.2008.doc
From: Haringey Federation of Residents Associations
To: Michael Walker, Alexandra Beer and Jenny Jones, London Assembly Planning and Housing Committee

Re: London Assembly Review of Community Involvement in Planning in London

You ask a lot of complex questions!

I enclose in reply:

- a report of a 2010 HFRA conference on planning issues
- a statement/submission we made to the Mayor of London during a similar consultation in early 2009

best wishes
HFRA Secretary..

HFRA response to the 'Planning for a Better London' - Consultation paper from the Mayor of London

10th November 2008

To: The Mayor of London - Mayor@london.gov.uk

From: HFRA Secretary

HFRA response to the 'Planning for a Better London' - Consultation paper from the Mayor of London
(DOCUMENT AVAILABLE ON REQUEST)

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NBH005 London Forum of Amenity & Civic Societies

Sent: 25 July 2011 23:53

To: Michael Walker

Cc:

Subject: Re: London Assembly Review of Community Involvement in Planning in London

Follow Up Flag: NBH005_London Forum

Flag Status: Blue

Michael,

Thank you for the invitation below.

London Forum's 130 member societies were asked last week to respond to the committee's questions and our organisation will give the Assembly Members an update on London Forum's views on this subject when that is convenient.

[] of the national Civic Voice organisation has notified me of your request to him for input but we think that the circumstances in London are different from those in the rest of the country due to the London Plan as part of our Development Plan and the Mayor's strategies and SPGs.

Regards,

,

Chairman,

London Forum of Amenity & Civic Societies..

Response to the Review of community involvement in planning in London

The London Assembly Planning and Housing Committee has agreed to review whether the new opportunities and procedures for community involvement in the planning system beyond simple consultation will be effective in London and what, if any, improvements need to be made.

Please find a response by Stan Gono on this review.

The purpose of the review is to investigate opportunities for London's communities to develop their own plans which reflect local priorities and to remain involved with the implementation of those plans and planning decisions. It will assess how well neighbourhood planning can operate within the unique hierarchy of planning that operates in London – both at regional and borough level – and how strategic and local objectives match up.

Your contribution is sought on all or some of the following general questions:

1. How will neighbourhood planning work in London? What new approaches are needed to reflect London's unique situation?

London is a cosmopolitan city where people are able to access facilities and services all over the city and not particularly restricted to areas where people live, work play, etc. There are diverse cultural backgrounds in London with facilities not restricted to any area, for example African Caribbean food shops can be found in Peckham, Brixton, Tottenham and other areas. Similarly Asian food shops can be found in East Ham, Southall, Barking and other areas. The spatial extent of the 'neighbourhood' could therefore be London wide and beyond as the catchment area for the service, facility or resource in these areas.

Wider involvement for consultation exercises/exhibitions by experts, Public Relations and survey companies going where the people are going and engaging them there, such as at: Citizens Advice Bureau; Music venues; Voluntary Services; Colleges/University; Police Stations; Magistrate Courts; Town Hall; Hospitals/Clinics; Doctor's/Dentists Surgeries; Gym/Physiotherapy; out-of-town retail shopping centers; parent/Teacher Associations; Residents associations; Chambers of Commerce; Libraries; Supermarkets; Local Markets; Sports venues; Allotment Gardens; Places of Worship, etc. Targeted research may yield better results than postal survey questionnaires.

2. What impact will the proposals have on local involvement in planning?

Maybe it will raise unreal expectations of change, when not much is going to change. Some people may initially want to get involved and then drop out when the excitement dies down. Some may have been hoping that this opportunity arise, and will be expecting the 'new' way of doing things to be adopted. There is usually a trial period for any new approach and the real test in putting new approaches to the test in practice.

Planning is a political activity. The public do not understand that Planners in the public sector are employed by Councilors who make final decisions. Planners usually have huge workloads. They need sufficient time and resources to process planning applications. The process is well established and needs to be understood by those outside the system. Maybe have Area Team Managers' meetings with senior and junior planners put on local TV or documentaries to educate society beginning with school children and college students and the public on the planning process.

Planners' case for more resources is not well supported by senior leadership within Councils, where decision makers are not planners. Neighbourhood planning could easily delay the whole system further as everybody would now seek attention from an already overloaded planning case workload. Unless there is added value in neighbourhood planning the existing local authority arrangements for dealing with planning matters may not welcome additional workloads. New priorities are required with buy-in from Councilors, Planning Managers, Planners, Developers and other stakeholders.

3. To what extent will local people be able to realise their development priorities through Neighbourhood Plans?

People's views need to be respected for these to be incorporated into the final outcome of these plans. It is usually the views of the articulate few which are heard. Experience gained by Planning for London could possibly be useful in gaining understanding in how to engage difficult to reach groups.

4. How will neighbourhood planning relate to Borough-wide and London-wide levels of planning? What support is needed for local communities to understand and take into account the wider planning framework?

People need to know how to communicate their ideas without wasting time and resources. Leadership is required. They need effective facilitators to enable this. Could use Planning Aid experts and Planning students with support from Planning Universities to help local communities in the new approach. Students would learn the practical aspects of dealing with diverse stakeholders, communication skills, understanding constructive criticism; provoking

hard to reach groups to participate; tap into local wisdom found in other cultures, the elderly, and youth etc.

Council planning websites are very complex even for professionals to navigate and find information. Planning appeal cases are very difficult to find. The Planning Portal requires significant improvement to be user friendly. For example only the 2006 planning decision letters can be accessed in 2011- a gap of five years. Planning changes of March 2011 Written Ministerial Statement by Communities and Local Government and draft National Planning Policy Framework (NPPF) are now material considerations in planning appeals, yet recent appeal decisions have not yet been scanned into the system by both Councils and Planning Inspectorate/Infrastructure Planning Commission. Both need an urgent revamp so that planning can be seen in more serious light than at present.

We are also very interested to hear about some more specific issues. For example:

5. What do you see as potential solutions to the problems and barriers identified?

How could they be developed and implemented in London?

Educate the general public on Planning Committee process. Have planning Hearings and Inquiries on TV. Mediation in action could also be put onto local TV. Education and effective communication are potential solutions to understanding that planning happens in an agreed set of societal values. Every stakeholder needs to understand any changes now being proposed and their consequences.

6. Is there a need for new and innovative ways of providing advice and support to local communities and what could these look like? Who should (and can) be involved and how could support be funded?

The innovative approaches should follow tried and tested methods which have been developed elsewhere in this country or abroad. Themed events involving with participants given briefing packs at registration followed by presentations by Developers, Planners, Architects, Councillors could be made on such topics as 'regeneration', 'master planning'; urban design; etc. This could be followed up with structured study tours/site inspections on coaches or on foot. Workshops/ discussion panels/ debates facilitated by experts. Each Panel would provide feed-back and final debate maybe recorded by a local TV station. A report could then be written up on outcome of the day/week-end meetings.

Efforts have been made on local TV to highlight problems associated with big building projects and re-use of National Trust Houses, big Country Estates, etc with follow-up to find out new challenges experienced and success or failures made. Similar consistent effort, time and resources are required to follow-up planning matters and keep all participants informed and involved in the process.

7. What are the practical implications of neighbourhood planning for proposed development? For example regarding the level of engagement and consultation between developers or applicants, local planning authorities and local people.

Logistics include costs for venue hire; transport; printing for exhibition boards and briefing packs; visualisation models; opinion boards; post-it notes; resource packs; questionnaires; reports; payment for hiring facilitators; refreshments; TV air-time; security; Community Infrastructure Levy (CIL) and Section 106 legal obligations may be required to raise funds for this process from Developers.

The practical availability of local accessible venues maybe helped by temporary use of vacant local shops in local communities for holding exhibitions and consultation exercises, etc. This requires negotiation and agreement with property owners.

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Business Neighbourhood Frontrunners Expression of interest	
Name of business neighbourhood proposed and the local planning authority within which it sits	South Bank and Waterloo, a cross-borough neighbourhood spanning Lambeth and Southwark planning authorities
Name of body making the application. For the purposes of establishing Business Neighbourhood Frontrunners, local planning authorities are being invited to nominate suitable areas directly.	<p>South Bank Employers' Group, a not for profit company limited by guarantee, established in 1994 by major South Bank organisations to promote and improve the South Bank neighbourhood.</p> <p>The principle of SBEG's participation in the Frontrunners scheme has been discussed and agreed with Lambeth Council, and is under discussion with Southwark which is already supporting a front runner in the adjoining area of the Better Bankside Business Improvement District.</p>
Key contact(s) at the body making the application with their contact details	<p>Ted Inman, Chief Executive</p> <p>Ben Stephenson, Head of Policy and Business Development</p> <p>South Bank Employers' Group 103 Waterloo Road London SE1 8UL www.sbeg.co.uk</p>
Give a brief description of the neighbourhood including population, geography, key infrastructure constraints / capacity / needs	<p>The South Bank and Waterloo neighbourhood is bounded to the east by the Blackfriars Rail Bridge, to the south by Lambeth Road and to the north and west by the Thames. It is a complex mix, including a major transport hub, international business headquarters, world-renowned cultural institutions and visitor attractions, a major teaching hospital, two universities, and a strong and diverse residential community. Its community comprises:</p> <ul style="list-style-type: none"> • 12,000 residents, two thirds in Lambeth, one third in Southwark • 50,000 employees, many of whom are Lambeth and Southwark residents • 25m annual visits to the South Bank riverside • 130m annual journeys through Waterloo Station • 750,000 patient visits a year to St Thomas' Hospital • 45,000 students at King's College London and London South Bank University <p>Its needs are complex, with key infrastructure constraints including a transport interchange at capacity, rapidly rising visitor footfall in a limited geographical area, and underprovision of retail. As an Opportunity Area identified in the Mayor's London Plan, Waterloo faces the challenge of further expansion with an indicative employment capacity identified at 15,000 new jobs and a minimum number of 1,900 new homes. Major development is also planned in the Southwark part of the neighbourhood.</p>
Describe the balance between commercial and residential interests in the neighbourhood by reference	<p>The Waterloo Supplementary Planning Document reflects the balance between commercial and residential interests, as identified in consultation among all sections of the community:</p> <ul style="list-style-type: none"> • Waterloo's land and buildings currently balance four core functions and communities: residential, business, cultural and transport

	<ul style="list-style-type: none"> • Future development in the area should maintain this balance while addressing these needs • No one function should be developed to the detriment of the others • All communities would benefit from improved retail, open space and social infrastructure <p>In addition the South Bank Partnership's Manifesto, the basis of an already agreed neighbourhood plan, reflects a high degree of consensus. The South Bank Partnership, jointly chaired by the local MPs, includes Lambeth and Southwark Cabinet representatives, ward councillors from both boroughs, the Mayor's agencies and Police, voluntary sector and South Bank Employers' Group members. SBEG provides the secretariat. The Manifesto, endorsed by the MPs, the leaders of both Lambeth and Southwark Councils, ward councillors and all members of the Partnership, calls for</p> <ul style="list-style-type: none"> • Economic growth, new developments, new jobs and better retail; • Improved schools and training, especially to benefit local residents without work; • A safe, clean and accessible environment for all; • An efficient transport interchange and improved transport links; • Improved health and housing and increased opportunities for culture, sport and recreation and community engagement; • Reduced carbon emissions.
Describe the major planning and development challenges facing the neighbourhood.	<p>Challenges facing the organic development of the South Bank and Waterloo neighbourhood are identified as:</p> <ul style="list-style-type: none"> • The lack of retail • The quality of the public realm • Transport infrastructure • The difficult balance between contributions sought from developers for major infrastructural programmes, and those sought for the benefit of the locality • The threat to viability of major developments where contributions are too great or unpredictable • Heritage issues • The requirement for greater cross-borough coordination
How will the new neighbourhood planning tools (e.g. neighbourhood development plans and neighbourhood development orders) help you to deliver your intended goals? What issues / policy areas / development types do you expect to cover?	<p>The principles of neighbourhood development are established by the London Plan, and existing local planning documents prepared with considerable business, ward councillor and community input. SBEG sees the prime use of the new neighbourhood planning tools as providing the opportunity to consolidate and reinforce the arrangements for implementation in the neighbourhood with the aim of securing economic and community benefit from development with the maximum degree of coordination and value for money.</p> <p>The South Bank Manifesto will form the basis of a Neighbourhood Plan which will enshrine the aspirations of the community into a statutory mechanism to enable delivery in such areas as:</p>

	<ul style="list-style-type: none"> • Improvements to the public realm • District Energy Network proposals • Creating a balance in the retail offer to grow both new and traditional audiences • Local coordination of developer contributions to meet the challenges identified, in a way which does not prejudice viability of the developments
Add any other relevant information that you think would support your application. This might include the proposed approach to community engagement.	<p>Under the auspices of the South Bank Partnership, with other business organisations and many local community groups, there are long established channels of communication with the community, including the South Bank Forum, a neighbourhood discussion Forum which quarterly attracts in the region of 100 residents (chaired by Kate Hoey MP and Simon Hughes MP).</p> <p>A detailed view of community aspirations was also secured in 2009 when, again under the auspices of South Bank Partnership, IPSOS Mori undertook a comprehensive survey of residents, employees and visitors which established a high degree of consensus in the aspirations of these three elements of the community and which continues to inform local thinking on the area's development.</p> <p>Close relationships with Ward Councillors enable productive discussion and ongoing feedback from the community, as does the South Bank News, a regular newsletter which is regularly sent to all households in the SBEG/South Bank Partnership area.</p>
Name of applicant, organisation and position	Ted Inman, Chief Executive SBEG
Date	13 May 2011

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NBH008 Wimbledon Society

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Sent: 26 July 2011 16:31

To: Michael Walker

Cc: Alexandra Beer

Subject: RE: London Assembly Review of Community Involvement in Planning in London

Follow Up Flag: NBH008_Wimbledon Society

Flag Status:

Thank you for your email and the letter attached. We will do our best to respond ..

Yours sincerely

Chairman

The Wimbledon Society

(No further correspondence listed)

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NBH009 St James' Conservation Trust

8th August 2011
Jenny Jones, AM
Chair of the London Assembly Planning & Housing Committee
London Assembly
City Hall
The Queen's Walk
London SE 1 2AA

Dear Ms Jenny Jones
Review of community involvement in planning in London

[] Chairman of the St James's Conservation Trust thanks you for your letter dated 25th July 2011 which he has studied and to which he has requested me to respond.

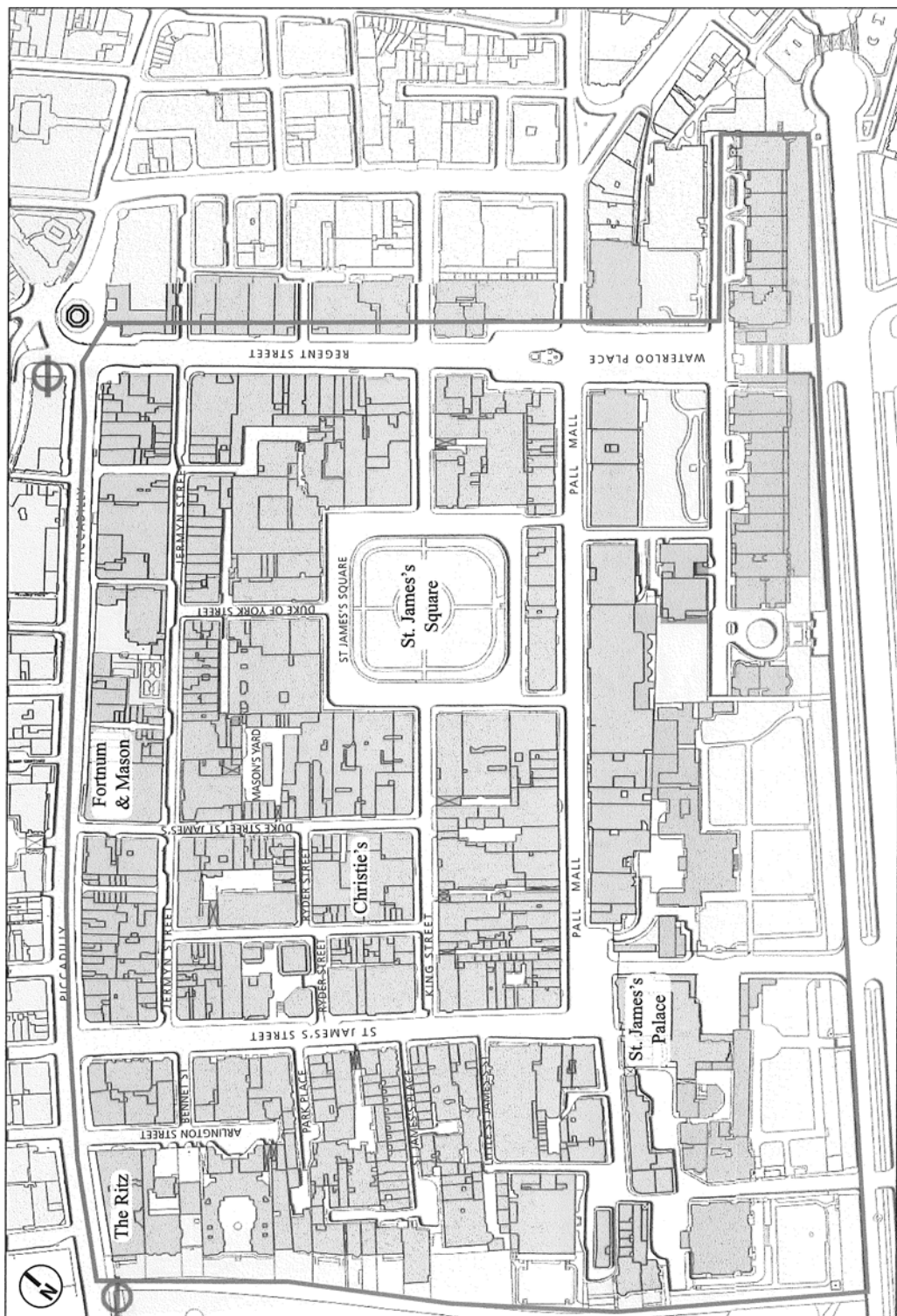
You will see from the attached map that our Trust has a relatively small but very special Area of Benefit which relates closely to the map of Conservation Audit No. 17- St James's and the St James's Special Policy Area, The Trust has been in existence since 1998 and over the years it has gained a good reputation with Westminster City Council for its sound planning and architectural responses. This reputation, undoubtedly, is due to the constant advice it receives from [] Technical Director Atkins public realm, who has been the author of three seminal planning documents, commissioned by the Trust, which are used as references by Westminster City Council planning officers for matters relating to the core area of St James's. In response to your question 5, our Trust is closely involved in Westminster City Council's planning application procedure. Each week it downloads planning applications relevant to our Area of Benefit, registers them and asks [] whether or not it should request full planning application details. The Trust requests these from Westminster City Council which are forwarded to [] for his professional advice so that a response can be sent to the City Council by the Trust. The Chairman of our Trust is always involved with major developments in our area and it has become the habit of developers to present their plans to the Trust prior to their final submission to Westminster City Council.

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In addition, our Trust is consulted by the City Council on all major planning matters. In recent months these have included the Core Strategy and City Management Plan of the Westminster City Council's Local Development Plan which has involved giving evidence to the Planning Inspector. In addition our Trust has responded on the Air Quality Action Plan, Westminster Way- public realm strategy, the Strategic Flood Risk Assessment, and the Westminster Noise Strategy.

It is difficult to respond to planning issues outside our Area of Benefit where we are the only organization that is solely dedicated to planning matters. We see no advantages in changing the existing system in our area and adding another tier of planning control; it would be expensive and administratively cumbersome. The City Council's planning department already is, most probably, overstretched and adding another tier might degrade their normal day- to -day work.

Yours Sincerely,
Administrator to the St James's Conservation Trust



**Review of Community Involvement in Planning in London by
London Assembly Planning and Housing Committee**

Professor Yvonne Rydin Y.Rydin@ucl.ac.uk

Bartlett School of Planning, UCL

21st August 2011

Reasons for problems with community involvement in planning

Research¹ identifies a number of reasons for the lack of community involvement in planning, particularly in plan-making:

1. The costs of participating are too high due to distant locations of venues, inadequate childcare provision, inconvenient timings, etc.
2. The identified benefits of community involvement are unclear and poorly communicated.
3. The identified benefits are too distant in time.
4. The identified benefits are too generalised, affecting a large part of the community rather than the specific members who get involved in planning.
5. Members of the local community are unable to see the link between their involvement and desirable outcomes.

Potential impact of the neighbourhood planning regime on community involvement

The shift towards neighbourhood planning offers the scope for increasing the desire of community to be involved in planning by altering all these features.

1. The focus on the neighbourhood means that planning events can be scheduled within the locality and the community potentially can have control over how those events are carried out.
2. The community can focus on producing benefit that they specifically wish to see result from planning. In so far as they are in control of neighbourhood planning, they are also in control of communication.
3. The community can choose to focus on more immediate benefits to the local area in their planning proposals.
4. The more limited spatial remit means that the benefits of neighbourhood planning fall on a more restricted group, a more tightly defined local community.
5. The direct involvement of the local community in preparing a plan – as opposed to offering consultative input into a plan prepared by others – makes the link between involvement and planning outcomes closer.

Potential drawbacks of the neighbourhood planning regime affecting community involvement

However, for this shift to fulfil the promise of more extensive and committed community involvement, the neighbourhood plan needs to follow closely on community wishes and the implementation of that plan through planning control also needs to be clear. There are a number of features of the new system that may create problems.

- The presumption in favour of sustainable development may undercut the implementation of the neighbourhood plan as drawn up by local communities. If the plan is over-ridden by planning consents granted in line with the presumption (or it is perceived by the local community that this might happen), this will have a negative impact on the communities wish to remain involved in local planning.
- Local planners may find themselves in a difficult position, seeking to support communities in preparing neighbourhood plans but also representing the council that may have to give consents that over-ride the plan.
- In London, the role of the GLA in directing consent or refusal for major developments may also undercut the new system. Communities may draw back from involvement if they see the GLA giving consents that do not accord with neighbourhood plans.

¹ Rydin, Y. and Pennington, M. (2000) 'Researching social capital in local environmental policy contexts' (with M. Pennington) *Policy and Politics* Vol. 28 No. 2 pp. 33-49

Rydin, Y. and Pennington, M. (2000) 'Public participation and local environmental planning: the collective action problem and the potential of social capital' (with M. Pennington) *Local Environment* Vol. 5 No. 2 pp. 153-169

Rydin, Y. and Holman, N. (2003) 'Re-evaluating the concept of social capital in achieving sustainable development' *Local Environment* Vol. 9 No. 2 pp. 117-134

- The potential for businesses also to draw up neighbourhood plans may also impact negatively on community involvement. Local communities may find themselves back in a reactive and negative role in relation to such plans, as opposed to the more proactive and positive role that was envisaged in the Localism agenda.

The role of local planners

- The above points highlight that local communities will require a considerable degree of 'process knowledge' about how the planning system works in order to draw up effective neighbourhood plans. This will be a significant role for local planners to play in supporting local communities. Local councillors undergo considerable training before taking on planning functions; effectively a similar form of training will be needed for local communities during the process of neighbourhood plan-making.
- Local communities will also require other forms of knowledge concerning economic, social and environmental patterns and trends for their area to devise realistic plans for the future of their locality. Effectively local planners will need to fulfil a research function for local communities. The resource implications of this could be significant and demands for such research not easily managed by the local authorities. There may be economies of scale in London Boroughs cooperating on providing such a service.

The most challenging issue will be for local planners to represent the need to integrate the outcomes of neighbourhood planning across the individual boroughs and London more generally. In general such integration is not an issue that local communities will be prioritising. Borough LDFs and the London Plan can play a role here but, as these were developed under the prior regime, they have been tested to see how robustly they can force integration upon neighbourhood plans under the new regime..

Date: 23 August 2011

Dear Alex

I am writing further to the letter of 20th July from Jenny Jones with comments on the questions asked as part of the Planning and Housing Committee's review of community involvement in planning in London.

As the new London Plan makes clear, the Mayor agrees that the planning system can play a major role in decentralising power, strengthening communities and neighbourhoods and promoting London's sustainable development. He sees the London Plan playing a vital part in this, providing an essential resource for localism by presenting an evidence base and framework for more local decisions to be made in ways that help ensure the needs of the city as a whole are addressed.

In particular, he supports approaches to planning, regeneration and development that harness the knowledge, commitment and enthusiasm of local communities, enterprises and other groups and encourages approaches that enable communities to shape their own neighbourhoods through the development and management of land. The Plan includes a number of policies dealing particularly with place-shaping and the promotion of lifetime neighbourhoods to provide support for these kinds of approaches, and as I explain later in this letter, he intends to provide more detailed guidance to support these to help those preparing neighbourhood plans.

I will address the questions in your letter in the order asked.

1. How will neighbourhood planning work in London? What new approaches are needed to reflect London's unique circumstances?

The Government's proposals for neighbourhood planning have the potential to support the emphasis in the London Plan on ensuring London is a city of diverse, strong, secure and accessible neighbourhoods to which Londoners feel attached, which provides all of its residents, workers, visitors and students - whatever their origin, background or status - with opportunities to realise and express their potential and a high quality environment for individuals to enjoy, live together and thrive.

However, the unique characteristics of London as a complex urban area with travel to home and housing market areas and self-identified communities and neighbourhoods that do not respect administrative boundaries do raise particular challenges for the Government's proposed approach.

In London the understanding of what constitutes or defines a neighbourhood may be more difficult to define than in more rural locations where settlement boundaries may provide a basis for doing so. Many communities here straddle borough boundaries, let alone ward ones. Although the Government has indicated that this should not stop the agreement of a neighbourhood forum and the development of a neighbourhood plan, it may make administering neighbourhood plans slightly more difficult due to different policy priorities or processes across borough boundaries.

Peoples' perception of what constitutes or defines a neighbourhood can also vary significantly. It may be based on physical elements such as residential blocks, district centre catchments areas, school catchments, etc or indeed community related activities through concentrations of ethnic or faith groups. How these different elements of a community eventually come together to propose a neighbourhood for the purposes of neighbourhood planning cannot and should not be pre-prescribed, as one size certainly does not fit all especially in London.

London, of course, is not parished, and therefore has no formal governance structure at sub-borough level. This means that if a community wished to produce a neighbourhood plan, it would need to set up a neighbourhood forum. Neighbourhood forums would need to be agreed by the local authority and would need to have governance arrangements agreed preferably through a constitution. The local authority would also have to agree the proposed geographical location to ensure that areas would not be covered by more than one neighbourhood plan. A neighbourhood forum, the neighbourhood forum would need to demonstrate that it was representative of the communities in the area covered by the neighbourhood plan. As well as residents, these may also include businesses as well as other stakeholders.

In London, neighbourhood plans have to be in general conformity with the strategic policies in local plans as well as the London Plan. This will mean the neighbourhood forum would need to have a good understanding of policies within both documents as well as other policy initiatives to ensure soundness and deliverability. This may mean neighbourhood forum will need to seek advice to ensure that the neighbourhood plan is in general conformity before detailed work is undertaken. It may also need to be an iterative process depending on the issues of the neighbourhood plan. The Mayor intends to help this process by providing guidance on "Shaping Neighbourhoods", which will help flesh out the relevant policies in the London Plan and advise on how they should be applied by neighbourhoods in developing their policies and demonstrating that they are in general conformity with the London Plan.

2. What impact will the proposals have on local involvement in planning?

There is the potential opportunity for greater engagement of local communities in shaping the areas that they live. This may bring with it a greater sense of community cohesion through increased participation in local issues, which may in turn help develop a stronger sense of connection to the places where people live as well as build stronger relations within communities themselves. It will be important to ensure that the views of those people who either don't have the time or inclination to become as involved are also represented, particularly if the plan is community-led. There is however, the potential risk of highlighting existing divisions between different groups, which may have conflicting ideas about how a place should develop. This may need to be managed through facilitation.

The proposals may also encourage developers to engage more with local communities through a more consensual approach, particularly in relation to larger development sites. If neighbourhood plans propose policies or even identify sites for developments, then it will be in the developers' interest to engage with local community on developing those issues. In fact, the Government has made it quite clear they do not see a problem with developers or the private sector, in general, helping to fund a neighbourhood plan. This may encourage a different approach to engagement and potentially change the relationship between communities, developer and the local authority.

Proposals for neighbourhood planning may also increase awareness of planning issues, and of the planning process - particularly given that people tend to be more interested in, and engaged with, issues that impact them directly. Complementary proposals such as community right to buy/ build / challenge may also help increase awareness and participation in community life through an increase sense of ownership of community assets and stake in the places they live.

3. To what extent will local people be able to realise their development priorities through neighbourhood plans?

Neighbourhood plans, development orders and other complementary proposals such as community owned assets provide local communities with increased power and discretion over the management of their areas and assets within them, if they so wish to exercise that power. This increase in power however brings with it increased responsibility; and whilst there might be a 'will' to undertake these activities, the funding or skills may not be in place to facilitate this.

There is, however, already a range of tools available for shaping areas at a different scale, through Opportunity Area Planning Frameworks, Core Strategies, Development Plan Documents, Supplementary Planning Documents, Area Areas Plans etc. If these documents are already in place, a decision needs to be made as to whether a neighbourhood plan adds value to the existing framework. As neighbourhood plans will entail both money and time commitment from the local community, neighbourhood plans should therefore be able to have the scope to add value otherwise local communities may end up being disenchanted and frustrated by the planning system.

There will be a need for clarity about the framework under which these plans will be prepared and implemented (and particularly that they cannot be used to prevent development). Although they provide greater opportunities for local communities to plan and shape their areas, planning is not undertaken in a vacuum but operates within the context of a hierarchy of policies and procedures designed to ensure an appropriate balancing of objectives. This understanding is essential in order to result in neighbourhood plans that are sound and deliverable.

Neighbourhood plans do however bring with them the opportunity to bring in wider community issues into spatial and land use planning. Similar to sustainable community strategies, neighbourhood plans would allow more weight to be given to these issues within the land use planning context.

4. How will neighbourhood planning relate to Borough-wide and London- wide levels of planning? What support is needed for local communities to understand and take in to account the wider planning framework?

As previously mentioned, neighbourhood plans will be needed in general conformity with strategic policies of the local plans but also the London Plan. There will need to be a 'check' as is currently the case for borough plans to be in general conformity with the London Plan. If there are local circumstances that justify a departure from policy, any departure needs to be supported through a sound evidence base. As with borough local plans this may also be the case for neighbourhood plans.

The Government has made it quite clear that neighbourhood planning is based on the concept of growth. Neighbourhood plans can therefore propose more growth than is set out in either the London Plan or Local Plans but not less. The difficulty lies where the borough core strategy might not set out in enough detail where growth should be distributed. How these plans respond to that will be an important consideration for those who 'examine' the neighbourhood plan.

In terms of social infrastructure, neighbourhood plans may also need to balance local community aspirations for social infrastructure with the wider borough community needs to ensure that not only the right quantum but also its distribution meets the needs of both those communities with a neighbourhood plan as well as those without. This is particularly important because of funding restrictions and resources generally.

In terms of support and advice, the Mayor's intention to provide advice has already been noted. In addition, there are a number of organisations that can provide help to local communities, and consideration will be given to providing some signposts to sources of further help in this guidance.

Local planning authorities can also help to facilitate understanding of the wider planning agenda and how communities may wish to take account of the bigger picture. Local councils also have a role to play in facilitating links to other council initiatives to avoid duplication of work in the preparation of neighbourhood plans or simply to help tap into existing projects and initiatives.

The production of the Mayor's Opportunity Area Planning Frameworks also presents an opportunity to further articulate the relationship between the bigger London wide picture and how that is likely to impact spatially at a more local level. The frameworks set out the sum of developments over wider areas often crossing borough boundaries and so can give a sense of the scale of the development as part of the bigger picture in terms that are easily understood, such as housing and jobs numbers. As these frameworks also include detailed studies of infrastructure requirements they can also help inform local communities about these issues.

5. What do you see as the main problem for local communities in engaging with the planning system currently?

As with many professions, the planning system is awash with terminology that many local communities do not relate to. Particularly in London with the diverse nature of communities both in terms of language and culture, this can deter people from trying to engage in planning. The Mayor encourages plain English to help address this problem and ensure that Londoners can understand and relate to his plans. He also provides translation services to ensure that those whose first language is not English also have the opportunity to access and influence the development of his London Plan. Within the OAPFs a considerable effort is directed to producing clear maps and diagrams to help visually articulate planning policies.

Another problem in terms of local communities engaging with the planning system is being able to keep up to date with the changing political landscape and evolving policy framework. There is a raft of government and other guidance published which is time consuming to keep up to date with. Not only may this simply seem daunting for some people but, sometimes more challenging, is the time commitment involved which is often on top of people's 'day job'. Government's intention to move towards a consolidated National Planning Policy Framework will be helpful in this regard.

The issue of time commitment may also pose a problem in terms of the length of time involved in planning; whether through the development of policy or through planning applications. Preparing a neighbourhood plan could well involve a substantial investment of time from people with work and other commitments. The fact that there can be a high turnover in residents of particular neighbourhoods in London may mean that some members of the community, whilst caring about their local area, do not necessarily get too involved in local planning issues, as they will move on in the short or medium term. For others who do have a long-term commitment to the areas they live, the timescales involved may pose problems in terms of consultation fatigue as well as continuing to maintain a level of interest through the process.

The scale of the planning issues facing particular neighbourhoods may also have an impact on communities' willingness to become involved. Many communities may feel much more prepared to engage in planning matters that have a direct impact on themselves such as a planning application. It is sometimes harder to get that same level of engagement for policy development where the impact is less direct or the perception of its impact is more removed.

Another problem is that many local communities may simply be unaware of what is happening, particularly if the issue is of a more strategic nature. Whilst there are avenues to advertise what is going on (through local papers, local media, the distribution of leaflets, notice boards as well as electronic means such as Twitter, discussion forums, council's website, etc), these not only have resource implications but also are not all viable options whether through not being available or not reaching the right people. There will often be a need for local communities to take the initiative in finding out what is happening as well as on those trying to engage with local communities.

A further potential problem may be the 'appearance' that many decisions have been made before the community has the chance to influence them. One reason for this may be that communities' input into different stages of the planning system influences it in different ways. For example, responding to policy consultation can help influence the larger more strategic decisions; however there is often a significant time lag between communities' input into that process and the implementation of that policy. Whereas communities' input into planning applications may allow for more detailed discussion, the more strategic decisions may have already been decided through the borough core strategy and London Plan. As planning is not undertaken in a vacuum and operates within the context of a hierarchy of policies, it is important that communities' expectations are managed appropriately so that both they do not get disillusioned or frustrated by the planning system.

6. What are the practical implications of neighbourhood planning for proposed major development? How would you describe the role of the GLA and the Mayor for community-led plan making?

Developers will need to be more aware of neighbourhood plans and engaged with local communities. This may involve more front-loading stakeholder engagement and pre-application discussions, not only with the local authorities but also with local communities to get community buy-in and support for proposals.

There may also need to be a greater understanding and awareness of development viability issues by local communities, as well as an understanding of the various balancing of issues that sometimes need to happen in planning. If neighbourhood plans are too prescriptive, this could prevent development of certain sites and there is a balance to be struck between demanding benefits from development through mechanisms like planning obligations, and making demands so onerous that the development does not proceed.

In terms of major development, neighbourhood plans may also need to balance local community aspirations for social infrastructure with the wider borough (or in some cases sub-regional or Londonwide) community needs. How that balancing will be achieved and how developers might respond to that will be an important consideration for both developers as well as local communities proposing neighbourhood plans. This is an area where there is an important role for the London Plan and its supporting guidance.

The Mayor will continue to set the strategic direction for larger scale development across London to ensure that the strategic distribution of activities throughout London enables it to maintain its current role as a world class city, whilst also meeting the local needs of its residents, workers and visitors.

In terms of the Mayor's role in community-led planning, as noted earlier the Mayor will provide advice and practical guidance about how neighbourhood planning might operate in London through supplementary guidance on Shaping Neighbourhoods. He will also continue to facilitate the discussions for the development of opportunity areas. These involve extensive public consultation in partnership with the boroughs and give residents a very direct say in how strategic planning policy is articulated in relation to easily understood plans and proposals that communities can engage with and express opinions on. The Mayor will also continue to have a role in helping to facilitate discussion with the larger developers and communicating how their developments fit into the wider planning picture to local communities through the OAPF process.

7. How can local communities developing neighbourhood plans ensure they confirm with strategic policies? Will the proposed Mayoral SPG on neighbourhoods provide sufficient and practical advice?

This will be a matter where the Mayor will have to work with boroughs and individual neighbourhoods to ensure that strategic priorities and trends are addressed effectively in neighbourhood plans. It is intended that the proposed Mayoral guidance will provide some advice on this, but as the detail of the process is still being developed it is too early to be precise about precisely what form this will take.

For example, local communities will wish to seek advice from professionals, local planning authorities, GLA, etc on whether their neighbourhood plan is in general conformity with strategic policies. It will be important that this is done on key issues before communities go too far down the line and / or spend too many resources either in time or money. In terms of seeking professional advice, a skills audit may be helpful to see who in their community might be in a position to provide informal advice. The local authority may also be in a position to offer support in understanding some of the more strategic issues that may set the context for the neighbourhood plans.

The Mayoral SPG on Shaping Neighbourhoods is intended to provide guidance on the implementation of lifetime neighbourhood principles as well as some advice on how neighbourhood planning may operate in the London context. It is not intended to prescribe exactly what must be done, but instead set out some helpful guidance on what issues local communities may wish to consider in terms of lifetime neighbourhood principles as well as some practical advice about how neighbourhood forums may operate, as well as indicate sources of data and contacts for other organisations who may provide support in the development of neighbourhood plans.

I hope this information is helpful. Please do not hesitate to contact Rachael Rooney if you would like any further information, or for a more detailed explanation of any of the points raised in this letter.

Yours sincerely

Andrew Barry-Purcell
Senior Manager – London PAn

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NBH012 Southgate District Civic Trust

Sent: 23 August 2011 16:57

To: Alexandra Beer

Subject: Review of community involvement in planning in London

Alexandra Beer,

Assistant Scrutiny Manager.

Response to Review of community involvement in planning in London:

The present involvement of the Southgate District Civic Trust (SDCT) in Planning, is a representation on the Enfield Council's Conservation Advisory Group (CAG). The SDCT has a planning group consisting of SDCT members with a Chairman who represents SDCT on the CAG. The CAG consists of a selection of local groups, local Cllrs and Council officers and advises the LBE Planning Committee on planning applications in designated conservation areas in the borough of Enfield, and other local major schemes if they are relevant. The SDCT is responsible for covering the interests of six of these conservation areas. Our planning group receives the planning applications for all our areas, and sometimes for other major proposed developments in other areas of Southgate. We follow up our meeting by sending a report on these applications to the planning officer at the council, who is dealing with it. The SDCT is an amenity society.

No discussion about neighbourhood or local community involvement in planning can be meaningful until the terms "neighbourhood" and "local community" are properly defined. This definition might include residents associations. However, some areas may not have one and in those that do they vary in their effectiveness and the degree of individual participation. Would it therefore be necessary to create bodies to represent local people in some places? Lines of communication with these bodies would need to be established and ways of ensuring that the people are fully informed.

The main problem of obtaining the views of residents, apart from lack of information, is that participation by members of groups is variable, only a minority may take an active part and the organisation coalesces around a few leaders. Thus the purported opinion of the group may merely be the views of one or two strongly opinionated individuals.

Information must reach all the residents in a locality. Communication between groups to share views and objectives would be valuable when being able to respond to Borough-wide and London-wide levels of planning. Enfield has this in the CAG for conservation areas and it is needed for planning in general.

The Internet has an important role in facilitating this. Local communities should be provided with sufficient information about developments envisaged or proposed by Councils or private developers early enough to put forward alternative ideas. They would need to have access to professional advice to formulate these ideas.

Finally, something that has been a problem for a very long time. There should be a "level playing field" as regards planning applications. Local people, either individually or in a group with relevant objections should have the same right of appeal against approval of a planning application, as an applicant has against a refusal. The Appeal procedure should be available to both sides of a planning dispute. Larger developers have a financial advantage over people who have to live with the results, but have no right of Appeal. This may lengthen the planning process, but will create a fairer society.

Chairman of the Planning Group,
Southgate District Civic Trust.

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NBH013 London Borough of Hillingdon

Ms.Alexandra Beer,
Assistant Scrutiny Manager,
Greater London Authority,
City Hall,
The Queens Walk,
London,
SE1 2AA.

Ref: PECS / LDF / BW / 110812

23rd August, 2011

Dear Ms.Beer,

Re: REVIEW OF COMMUNITY INVOLVEMENT IN PLANNING IN LONDON

This is an officer-level response from the London Borough of Hillingdon to the letter dated 19th July, 2011 from Ms.Jenny Jones AM, Chair of the London Assembly Planning & Housing Committee.

In her letter she set out a series of general and more specific questions from the Committee to explore views on whether new measures being introduced by the Government are likely to be effective in encouraging greater involvement by the community in the planning system. She also asked what, if any, further improvements need to be made. I will deal with the questions in the same order as set out in Ms.Jones's letter:

General Issues

1.How will neighbourhood planning work in London and what new approaches are needed to reflect London's unique situation?

The definition of individual neighbourhoods is likely to be problematic in a diverse, densely-developed city. London is characterised by communities which are often fragmented (e.g. where they might be divided by major road routes), have a wide socio-economic range and high population turnover. It is difficult in those circumstances to expect a single neighbourhood forum to come forward which can readily agree on a set of common objectives.

It may be possible to base neighbourhoods around individual town centres or housing areas in a single ward or group of wards. A neighbourhood plan for that area might then readily relate to a wider borough-level local planning framework and the London Plan. But where that is not possible or where proposed neighbourhoods cross individual borough boundaries, or as can happen in outer London cross the Greater London Authority boundary, there will be difficulty for local authorities in resolving how to take a neighbourhood plan forward.

In Hillingdon officers anticipate that existing community engagement and initiatives by the Council may result in some interest in drawing up neighbourhood plans in parts of the borough. Hillingdon has a number of active residents' associations with a long involvement in local planning matters. It is likely that these areas might be expected to come forward with individual proposals for neighbourhood plans. They already appreciate the planning priorities set out in the Local Development Framework and the London Plan.

Elsewhere, the Council has recently been engaged with local business and residents' representatives in particular town centre improvement initiatives. Here there might also be interest in moving forward with a neighbourhood plan to consolidate and build on the basis of existing improvement programmes in those centres. However, the likelihood is that these neighbourhood plans would look to protect and enhance the existing character of their local areas, rather than to encourage new development. There will be an issue of reconciling local aims with wider borough or London strategic priorities.

2. What impact will the proposals have on local involvement in planning?

It remains to be seen whether the introduction of neighbourhood plans will result in those parts of the borough which have been less involved in planning matters to date now taking greater interest. Without a major, sustained development focus in their area they may remain disengaged from the planning system.

3. To what extent will local people be able to realise their development priorities through Neighbourhood Plans?

The Localism Bill is part of a general initiative by the government to shift power to local communities, helping them to do more for themselves. For this to happen, communities need support to be able to confidently research, discuss and agree priority actions for improving their neighbourhood. They will need a formal structure in place to do this. Establishing a steering or management group for a Neighbourhood Forum may be difficult without considerable support from the local borough.

This support might also be required to help keep that group functioning during what could be a lengthy process of plan research, preparation and consultation. One key factor is likely to be the mechanism by which deliberations can take place between individuals and community groups before reaching collective agreement on the content of a neighbourhood plan.

There will then need to be a means of ensuring the neighbourhood plan is implemented and actively monitored by the community.

4. How will neighbourhood planning relate to Borough-wide and London-wide planning levels and what support is needed to help local communities understand and take into account the wider planning framework?

In London all boroughs either have an adopted Core Strategy in place or are well-advanced in producing one. There will be little point in local neighbourhood forums being set up and bringing forward their own neighbourhood plans in advance of the adoption of local Core Strategies and Proposals Maps which will set an agreed, boroughwide direction of travel for local planning policies and set out detailed site proposals within which neighbourhood plans can then bring forward their own local proposals. This would comply with the guidance on neighbourhood plans given in the draft National Planning Policy Framework (at paragraph 50) recently issued by the Government.

Experience in Southwark in bringing forward initial neighbourhood plans there has suggested that it can be difficult to focus neighbourhood forum groups on what the output of their local neighbourhood plan should be. Before doing detailed work there may need to be some time spent in agreeing what the final form and content of the neighbourhood plan will be, if it is not to be too wide-ranging in scope and unmanageable for a neighbourhood forum to attempt. As a first step to producing a plan, it might help to have an agreed project plan or memorandum of understanding in place to avoid this.

This is where the facilitation role by the local authority or an independent planning advisor (e.g. a planning consultant) may be important in advising local neighbourhoods on the implications of their proposed plans and whether they are in general conformity with the borough LDF and London Plan.

An alternative source of advice and support for neighbourhood plans in London might be the Planning Aid service which has extensive experience of supporting local community groups' and individuals' involvement in the planning system.

Specific Issues

5.What are the main problems for local communities in engaging with the planning system currently?

This borough has had a good level of engagement by the public on significant local planning applications. Again, Hillingdon has a number of active residents' associations with a long involvement in local planning matters. By way of example, a recent planning application for redevelopment at a former RAF site in West Drayton has resulted in many representations being received from local residents. Where neighbourhood plans do come forward it would seem equally likely that the degree of involvement will be higher where these directly relate to a small area which local people know and appreciate.

Currently it is often difficult to engage the public in planning policy documents. These might be perceived as very technical and deter local community involvement as they normally do not relate to a single local area and cover issues which demand some knowledge of the planning system. Experience in Hillingdon has been that local partnerships find difficulty in understanding strategic planning issues. They tend to focus purely on local issues without reference to that wider perspective, and also they are primarily concerned with protecting and enhancing the assets that they have locally, rather than being supportive of new developments in their localities. Issues of constant concern to local groups generally relate to issues such as community safety, litter, graffiti, traffic, parking and the state of footpaths and the public highway.

Furthermore, the current system of Local Development Frameworks (LDFs) is more complex than the previous Unitary Development Plan system. With more than one document making up the LDF and these each involving two or more separate rounds of consultation and an examination in public, it now requires considerable commitment from the public to keep involved with the local plan system.

6.Can the proposals for neighbourhood planning achieve a positive change and lead to better involvement of the public in London – and what else might be needed?

One critical issue here will be whether local authorities have the resources available at present to help facilitate the neighbourhood planning system to come forward. Due to the budget pressures facing all councils, staff resources in borough services generally are already much-reduced across London and there must be a question as to whether there will be adequate numbers of skilled planning staff available to prepare and review the statutory planning documents required, let alone to facilitate local neighbourhood forums who wish to produce plans for their areas.

It is not borough planning staff alone who will be facilitating this work. There will be additional pressures on local Ward Councillors who will be required to commit a significant amount of their time to helping in the work of one or more neighbourhood forums in their wards. Similarly, Cabinet Members with planning portfolios will also have to commit their time and energies to this work, at a time when they are facing increasing pressures due to scarce resources.

Local residents will need to recognise the area proposed for a particular neighbourhood plan as one they are committed to and would wish to maintain involvement with over a long period of time if this system is to function properly. The practicalities of how they are involved, through a steering group or some other mechanism, have already been noted above and would need to be resolved for a neighbourhood forum to work effectively.

One potential benefit of the neighbourhood plan system will be if it can encourage and maintain the involvement of local people who know their area best, having experience of it day-to-day. Whereas top-down consultations may ask for views on pre-defined and limiting topics, the concept of a neighbourhood plan is that it should allow people with a connection to a particular place to articulate their views and aspirations for it without constraint. This might bring to light issues, concerns and priorities that may have previously failed to register in pre-existing data about that area.

7. Is there a need for new and innovative ways of providing advice and support to local communities – and if so, what might these be, who should / can be involved and how could support be funded?

Community empowerment is an agenda which boroughs are already addressing, e.g. through making best use of new communication technology (websites, Facebook and Twitter) to put across information cheaply and quickly to local communities. They also have existing networks of community groups and associations they can use to provide advice and support on neighbourhood plans.

Rather than introduce further new initiatives, from local knowledge of their neighbourhoods boroughs should be able to determine for themselves the best methods to use to support their local communities to encourage their greater involvement in the planning process.

8. What are the practical implications of neighbourhood planning for proposed development, e.g. regarding the level of engagement and consultation between developers or applicants, local planning authorities and local people?

Neighbourhood forums will need formal management structures in place for them to quickly respond with their reaction to new proposals in their areas. There will need to be an agreed mechanism in place for a neighbourhood to respond with its collective view on individual development proposals. Again, they will probably require support from their borough council to enable them to do this efficiently.

Again, resource availability for the boroughs will be a key issue, particularly regarding the proposal for local referenda to adopt finalised neighbourhood plans. The costs and staff time involved in advertising and staging individual referenda could be significant additional costs for local boroughs, especially in cases where they have several neighbourhood plans coming forward in their areas.

Thank you for consulting this authority as part of your review and I hope the London Assembly Planning & Housing Committee will find this officer-level response useful.

Yours sincerely,

Jales Tippell,
Head of Highways, Transportation and Planning Policy.

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NBH014 Jeff Bishop [BDOR Ltd]

.. From: Jeff Bishop Sent: 30 August 2011 16:40
To: Alexandra Beer
Subject: REVIEW OF COMMUNITY INVOLVEMENT

Dear Alexandra,

Please see attached my response for the Review of Community Involvement in planning in London. Early on in my submission I mention our recent research and that a copy is also being sent - that is the other attachment.

I hope very much that this proves useful to you and your colleagues.

Regards

Jeff Bishop
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BDOR Ltd

COMMUNITY INVOLVEMENT IN PLANNING IN LONDON

Response from Jeff Bishop, Director BDOR Limited

1. INTRODUCTION

I greatly value the invitation to respond to the request to contribute to the 'Review of Community Involvement in Planning in London'. The request generated some initial queries that need to be dealt with here because they have influenced what is presented later.

'New Opportunities'?

The invitation to respond starts by mentioning the 'new opportunities and procedures' but I believe it is essential to start by reviewing the existing repertoire of approaches and methods to see if they are appropriate in principle, whether they have been used fully and effectively and how they might be improved. A further reason for starting with existing practice is because the 'new opportunities', presumably those deriving from the Localism Bill and the National Planning Policy Framework (NPPF), are not as yet set in stone. The NPPF is a consultation draft and the Bill is not yet an Act; indeed it appears to change almost daily in sometimes quite significant ways.

In looking at the 'new opportunities', even with the above proviso, there is a need to consider what if anything they add positively to the existing repertoire and whether any of them will damage or lessen the significance of proven existing approaches.

'Planning'?

I am also assuming that the focus is on statutory land use and spatial planning. However, many other 'planning' activities take place in other policy areas, often with good levels of community involvement (as is the case in some health service planning). Most importantly, the core tradition from almost 20 years of community-led planning practice comes from experience in rural areas through initiatives such as Parish/Town Plans and Parish/Town Design Statements. Such 'plans' were never intended to include explicit land use or spatial issues or proposals but instead drew their often considerable strength from being otherwise holistic and highly locally distinctive documents. With this in mind it is not possible, indeed it could be damaging, to draw a neat line around purely land use and spatial concerns; after all, that is how local people, rather than planners, think. It is also worth noting that much of what is in the Localism Bill draws from this predominantly rural practice, although there is absolutely no reason (as will become clear) why Parish Plans could not become urban Community Plans and Village Design Statements become Neighbourhood Design Statements.

'Community'?

From my experience, the term 'community' is often defined far too narrowly, solely as those resident in a particular area or neighbourhood. Though local residents are critically important, it is also essential to include local businesses, those who do not live in an area but visit and use an area (for example to local leisure facilities), perhaps even those who pass through (eg. commuters creating air pollution in an inner city area). Taking this more broadly, into the territory of 'stakeholders', effective involvement also requires the inclusion of those from other government agencies, utilities companies,

emergency services, private organisations (eg. Chambers of Commerce), land owners, developers, trusts, community and voluntary organisations – almost all of which will not necessarily be part of any ‘local’ community.

‘Involvement’?

Securing final agreement on the differences between consultation, involvement, participation, engagement and collaborative working is probably impossible! However, there are differences that need to be understood. In general, ‘involvement’ sits only at the middle of a scale starting with consultation (hence offering very limited opportunities to contribute) and ending with delegation to a ‘community’.

‘Engagement’ is now a commonly used term which implies something more significant than involvement, ie. that the consultees/stakeholders have a genuine opportunity to work almost as equal partners with the professionals and elected members and share in activities that are about in-depth dialogue. For me, ‘engagement’ is the lowest level to aim for because it is only at that level that real savings of time and resources are possible and a real sense of shared commitment can develop. Even better, but more challenging, is to shift towards genuine collaborative planning in which old prejudices about ‘top-down’ or ‘bottom-up’ and ‘professionally-led’ or ‘community-led’ can be consigned to the dustbin of history. (And there are now many examples of collaborative approaches proving their value.)

With that background in mind this response covers the following:

- **A critique of existing approaches and suggestions for improvement**
- **A critique of Localism Bill opportunities and suggestions for improvement**
- **Specific answers to the questions 1 to 7 in the invitation to respond.**

As suggested already, the first two of the above are important to avoid having to elaborate themes perhaps several times in answering questions 1-7. Before starting, it would also be valuable to provide a brief outline of my ‘pedigree’ in making the comments that follow.

I have worked in and around issues of participation (a term we never seem to use today), involvement and engagement in the areas of planning, design and regeneration for almost 40 years. For the last 24 years that has been as a consultant undertaking practical, grounded **research** on the topic for central government, government agencies and others, running **training** events for civil servants, communities, elected members, planners, other environmental professionals and developers, and designing and managing **engagement processes on plans and projects**, large and small, urban and rural. Several of the latter have been quoted as ‘models of good practice’. My consultancy has stayed small because we work extensively with a national network of like-minded and similarly experienced colleagues. My work has also taken me overseas, notably to the USA and – on a longer term basis - to Italy. In total this offers what may be a unique experience at all levels on ‘community involvement’.

In association with this response I have also emailed a copy of a research report completed only recently that describes much of what follows in more detail. That research set out to consider the implications of the Localism Bill and appears to be the only study of this sort completed since the Bill was published. Because of that, the only references included in this paper are those not in the background research.

2. EXISTING APPROACHES

There are three main areas of activity within existing approaches:

- Involvement in statutory plan-making
- Pre-application engagement
- Initiatives developed by communities

Involvement in Plan-making

Although 'participation in planning' has a long pedigree (one the UK can be proud of) the key impetus came with the 2004 Planning and Compulsory Purchase Act. This placed considerable importance on involvement (the government's preferred word) and backed this up in particular with the introduction of Statements of Community Involvement (SCIs). Every local planning authority had to produce an SCI and get it formally adopted. An SCI sets down standards for involvement in plan-making and outlines some of the ways in which, and methods through which, those standards would play out in preparing Development Plan Documents. It was always assumed that, if a DPD was submitted for examination and it could be shown that (a) the standards had not been met or (b) reasonable information, ideas and parameters suggested by consultees had been ignored, that DPD could be declared unsound for those reasons alone.

A few – very few – SCIs ever managed to deliver fully on the ambition of the Act even in terms of their aspirations and standards; some are barely worth the paper they are written on. However, some extremely innovative techniques have been used by some authorities in the involvement work that followed the Act and the production of SCIs, and some authorities have genuinely tried hard to reach the spirit of the Act and not just SCI standards. However, as the government's own research, and some other research, has shown, the reality in general has fallen well below the ambition. Most importantly, as another indicator of this, no DPD has been declared unsound solely as a result of inadequate involvement, though some that I know of certainly should have been.

Two related aspects of the 2004 Act and Regulations can be used to highlight the key failures. First, the Act and associated guidance adopted some principles from consensus building by making great play of the need to start early with involvement; what is termed 'front-loading'. The Regulations also made clear that 'the community' should be involved in *developing* the information base, in *developing* the key issues and in *developing* the options. However, the majority of practice failed to pick up on these two points and defaulted back to the previous formula of developing information, issues and options in-house, or with a minimum of involvement, and then publishing an 'Issues and Options' paper. This now discredited approach is often described as 'Decide-Announce-Defend' and, as a result of poor practice, remains the most common approach today. Given that it soon became clear that Inspectors were unwilling to be tough on involvement standards (in part because they too saw weaknesses in most SCIs) it was perhaps inevitable, maybe even reasonable, that hard-pressed planners would not give great priority to an activity that would not be greatly valued during examination.

Pre-application Involvement

Even before the 2004 Act there had been a number of quite leading-edge examples of thorough and effective pre-application involvement, if led more often by governmental bodies (eg. RDAs) than by private developers. These had shown clearly that, done properly, involvement can speed the process to the point that any financial investment in the involvement pays off handsomely while, at the same time, restoring community confidence, even a sense of shared 'ownership' of outcomes.

There were some mentions of pre-application involvement in the 2004 Act, and in associated guidance, and all SCIs were supposed to 'encourage' it. This is important because they were not legally able to 'require' it, ie. a lack of pre-application involvement could not be a reason to refuse to register an application or (if not done) a material consideration in refusing it.

Despite this, some government agencies continued to promote and almost require pre-application involvement – because they could. We ourselves produced post 2004 guidance for one RDA, and English Partnerships laid down and delivered (sometimes well, sometimes poorly) some quite robust principles for involvement. Using the RDA guidance, we have been involved in projects that have secured permission almost against the odds; in one case with, as the planning officer said, "staggeringly few objections" on a scheme that had been hugely contentious in its earlier life.

Also emerging at this time was the set of procedures that became called Planning Performance Agreements (PPAs). Interestingly, one of the very first statements in the guidance on PPAs highlights the importance of community involvement as an indispensable and integral part of good development planning. In general, PPAs are now beginning to prove their value and are becoming more regularly used. Though applied almost solely to very large and mostly public or public/private projects, there is no reason why formal or informal versions of the approach should not be used, 'appropriately and proportionately' as Inspectors might say, on smaller projects.

All this suggests that good value pre-application involvement is almost always one-off and ad hoc. There is, however, one very valuable example of how it is now being used more consistently and coherently across a whole local authority area. That example is in Bristol but the example will be covered more fully later because it also brings in other important dimensions.

Initiatives developed by Communities

Despite the earlier caution about the term 'community-led', there has been, for almost 20 years now, a considerable amount of practice that has involved local communities very directly in forms of plan-making, even in preparing, largely on their own, subsequently adopted Supplementary Planning Documents (SPD). As suggested earlier, however, this has taken place largely in rural areas. Although there are a few good examples in urban settings (Coin Street Community Builders being a shining example) there is no urban equivalent of the coordinated, managed, formal programmes initiated by those such as the Countryside Commission/Agency and supported with funding for training, grant aid, dissemination, even staffing.

Two of the key formats used in these programmes have been **Parish Plans** and **Town Plans**. Though slightly different (certainly in terms of funding and support) both formats were set up to be highly if not totally community-led. In both cases community groups,

often initiated through but semi-independent from Parish/Town Councils, undertook carefully managed surveys, often using a common core database of questions, set up 'Topic Groups', ran community engagement events and ended up with widely agreed 'plans' that set out both a vision and a practical action plan for their community and area. There are now over 4,000 of these across the country, many of which have secured some form of local authority support or endorsement and which have led to an enormous number of practical projects both by the community and by the relevant authorities. A typical Parish/Town Plan has been shown to generate several thousand hours of voluntary time.

The key proviso to this broadly successful story (there are also some horror stories and negative examples) is that the plans produced covered everything that a community was concerned about except land use or spatial planning issues. This was deliberate from the outset (if misunderstood on too many occasions) and it caused considerable frustration for many because aspects of development were precisely what many people wanted to deal with when setting out to produce a Parish/Town Plan. To counter this, the strength of such plans is that they deal holistically with (almost) all aspects relevant to people's daily local lives, important because local people do not divide their lives and interests in the way that professionals, authorities and legislation (eg. planning legislation) do.

Getting closer to land use planning activity, the other major strand of rural community-led activity has been forms of Design Statement. This work all builds from our own work (funded by the Countryside Agency) to invent, develop, promote and support **Village Design Statements** (over 450 of which have been produced to date). This has been followed up with a related format entitled **Town Design Statements** and, more recently, the approach has spun off into **Community Landscape Character Assessment** (which could be surprisingly relevant to London).

Design Statements (using that as the common name for all formats) have also been led almost entirely by local communities (if often with professional support at Town level), through groups more likely to be fully independent from Parish or Town Council. The aim of a Design Statement is for the community to express, with thorough evidence using a broadly common set of criteria, what it is that makes their place special or locally distinctive. Having produced that baseline, a statement includes some design guidelines, not so much about "do this, don't do that" as a challenge to any designer (applicant) to show how they have understood the local character and how their design reflects and enhances that character. A Design Statement is solely about how development might happen (especially how it might look); it should not say anything about what development might happen where. As a result of this last point, many Design Statements have been adopted as Supplementary Planning Guidance (more recently SPD).

I am proud of the fact that this procedure that we (myself and a colleague) developed meant that, probably for the first time anywhere in the world, local people were able to draft and publish documents that could be formally adopted into a statutory planning system! This was the birth of what are now the Localism Bill proposals.

More recently, the confidence given by Design Statement work both to planners (that communities could do serious work) and to communities (that their work would be properly valued) has been a major factor in shifts towards better engagement if not delegation in several other areas. Most notably, there are now examples of local

communities contributing to, and occasionally leading on, the very demanding technical work necessary to produce Conservation Area Character Assessments. There are several other strands to this work on community planning, all covered better in the associated research report.

The key point to make here is that there is no serious reason why an urban community in an urban neighbourhood – ie. in London - could not produce its own version of a Town Plan or Town Design Statement.

The Bristol Example

This one example shows, better than anywhere I know, how what has been described above can be brought together into a coherent programme with the obvious benefits of consistency and cumulative capacity building for all². *(I have to point out that Bristol is where I live and work but I have had little involvement in what follows.)*

- The planning policy team in Bristol City Council produced its draft SCI largely on their own. It generated a very strong negative reaction from various voluntary (often semi-professional) groups within the city. There followed a difficult phase with strong pressure from the groups to be more rigorous with the standards and procedures in the SCI and to be clear that these would be backed up with a robust programme of involvement on the Core Strategy. Out of this process emerged what is certainly one of the best SCIs in the country.
- The City Council then started the involvement on its Core Strategy. Though resources were limited (and the city is very large, over 450,000 people) their programme was very wide-ranging, reasonably front-loaded and well in line with their own SCI standards. Though debate continued to the very last minute, it is fair to say (as a local observer) that the resulting plan genuinely reflected a large amount of what had emerged from all sectors, groups and areas of the city during the involvement work.
- Around this time too, what had been a small and informal network of 'Neighbourhood Planning Groups' (NPGs) had started to consolidate into a genuinely city-wide network, even if still not covering many areas. NPGs kept an eye on all applications in their area, advised and supported residents and others in understanding them and, if necessary, commenting on them. Though NPG members themselves (as a matter of policy) never offered their own view on applications, this certainly raised the general standard of debate on the city around the quality of applications.
- Once the network had formally consolidated – it is now the 'Bristol Neighbourhood Planning Network' – its members continued with a coordinated approach to involvement in further plan-making work but also placed more emphasis on pre-application engagement. In formal association with the City Council they have now produced a set of guidelines that, in principle, can still only 'encourage' pre-application involvement but which, in practice, is quite difficult for an applicant to ignore. As a result, pre-application engagement (on projects over a certain size) is now close to becoming the norm.
- In addition, the heritage team in Bristol City Council has developed a highly interactive website called 'Know Your Place' which is linked to the encouragement of communities in Conservation Areas to undertake much of the character

² For fuller detail see: Farnsworth, D. *A Network Route to Localism in Planning*, TCPA Journal, Vol. 80 No. 3 March 2011, pp.128-132.

assessment work for themselves and, in non Conservation Areas, to record the heritage and perhaps to move on to produce neighbourhood Design Statements. Several local groups are now leading these processes and occasionally widening out to produce local Design Statements.

3. NEW OPPORTUNITIES

The new opportunities in relation to communities and planning would seem to be those as suggested in the Localism Bill, although the recently published draft National Planning Policy Framework (NPPF) and the Local Growth White Paper are also relevant as are, if more indirectly, other government initiatives. The obvious ones to comment on are:

- Neighbourhood (Development) Plans
- Neighbourhood Development Orders
- Community Right to Build Orders

Neighbourhood Development Plans (NDPs)

NDPs are almost a mirror-image of Parish/Town Plans. While the latter can and do cover anything except land use/spatial things so can therefore not become statutorily adopted, a NDP can only focus on land use/planning things as a result of which it can be formally adopted! There is of course much that we do not yet know about NDPs and what we know may well change. I do not therefore intend here to elaborate the basic content and procedures of NDPs. I focus instead on six key points.

Scope

Any NDP must be “*in general conformity*” with the NPPF and any Local – in London’s case Borough – Plan. This is therefore likely to limit the scope for a community’s NDP to make proposals for more or different development or to include different policies, for example on highways or design. This also depends on the level of detail reached in any Borough Plan; where this is limited, there will be more scope for local determination. The Bill and subsequent information makes clear that a NDP can include recommendations for more but not less development than in the Local Plan. This has already caused considerable anger amongst communities around the country as they had been led to believe from Open Source Planning (which is not to say this is correct) that they would have far wider powers to shape local development. The type of lists now being suggested for what a local community can control in its NDP are generally limited to quite minor aspects.

Bureaucracy and resources

Most of those who have kept pace with emerging information on the various procedures necessary for completion of a NDP have been aghast at the ever-increasing complexity of what is intended to be a community-friendly approach. Overall the likely stages include the following:

1. Defining the Neighbourhood
2. Applying to be a Neighbourhood Forum
3. Local authority advertising and assessment before agreement to plan preparation
4. Scoping undertaken to assess the need for an Environmental Impact Assessment

5. Undertaking pre-application consultation/assessment
6. Local Authority Duty to Support
7. Completion of full Environmental Impact Assessment if needed
8. Submitting draft plan/order for independent examination
9. Local authority validation check
10. Independent examination
11. Examiner's Report
12. Referendum on (modified) plan/order
13. Adoption by Local Authority

The issue of concern to local people has not simply been the complexity of the above but also the skill and resource demands such procedures would place upon them (and that excludes subsequent management of any NDP). 'Grapevine' messages suggest that many communities initially interested in preparing a NDP are now being put off doing so because of all the above demands.

This issue is also of concern to planners because, according to the Bill, there will be a formal requirement on local authorities to provide support to communities producing NDPs. As these are almost certain to be the more up-together, wealthy and professionalised communities, this seems almost certain to distort or undermine authority priorities which are more likely (and correctly) to be on areas and communities in greater need.

Qualifying bodies

Defining an appropriate body to prepare a NDP is superficially easy in rural areas, which are usually fully parished with Parish or Town Councils; ('superficially' because a good number of such councils are moribund). No such arrangement exists in urban areas so the suggestion is that appropriate bodies should include some form of Neighbourhood Forum, formally established and managed and able to show that it adequately represents its local/neighbourhood community. However, the ways of defining the legitimacy of any Forum are as yet not just unclear but contentious. Some of the contention lies in definitions of areas (see next section), some in the fact that there is often more than one organisation active in any area, maybe many (for example several residents/tenants associations and a civic society). It is also well known that those areas most likely to have a number of formally established likely candidates for Forum status are, yet again, the wealthier ones, whereas in more disadvantaged areas, there is an urgent need for more (and inevitably lengthy) community development before any Forum could possibly emerge.

Defining neighbourhoods

Trying to define neighbourhoods in urban areas has kept academics in business for almost 100 years, and there is still no agreement! There are questions about the size of any 'neighbourhood'; definitions by those such as local authorities almost always suggest areas and populations larger than those as seen by local people. In London in particular the notion of neighbourhood as perceived by local people is at a far finer grain than that seen on classic maps of the city (or in the Abercrombie plan) – Dalston, Clapham, Stonebridge are far too big. This is important because evidence shows clearly that participation rates increase dramatically as neighbourhoods get smaller, pivoting around a figure of perhaps 5,000 – 6,000 in urban areas. (A good council questionnaire might get a 5% response; the equivalent in a community of 5-6,000 could

be as high as 80%.) Move much above 5-6,000 and the lack of immediate relevance for people reduces interest and engagement.

Then there is the issue of defining boundaries. Centres of neighbourhoods can often be easy to define – a stretch of local shops or school location – but edges can blur significantly. This is exacerbated by contemporary urban life in which where one shops, works, enjoys leisure activities etc. operates on patterns unrelated to simple geography and is very often, for each of those activities and others, across a canvas far beyond a small neighbourhood.

Scope for businesses to lead

One recent amendment to the Localism Bill, that highlights issues around both appropriate bodies and neighbourhood definition, allows businesses (presumably something like a Chamber of Commerce) to become the appropriate body and run the NDP for its area. This clearly has relevance in areas dominated by business interests - large shopping areas, district centres and industrial estates – but it is uncertain how it might, or whether it should, apply to a small group of businesses at the centre of a mainly residential neighbourhood. This has caused a considerable knee-jerk reaction from those who believe it shows what they consider to be the true ‘development anywhere’ colours of the Coalition but, in principle, there is no reason why almost any organisation could not be an appropriate body if they then followed all best practice principles of local community engagement and could demonstrate to an inspector that they had done so and that the outcome reflects all views.

Referendum

As I am writing, the ‘grapevine’ is again buzzing about the idea of referenda being dropped or changed. This would be of real value because the idea has several fundamental flaws.

First, in terms of referenda in principle, the little experience that there has been at local level suggests that they can be extremely socially divisive. Secondly, they militate against people playing a role – as they should - in the all-important, front-loaded engagement work that ought to be a key part of the plan preparation stage. There are already two examples I know of where people did not get involved in project preparation work because they knew they could just vote against it later!

Thirdly, the suggestion in the Bill that a local authority or inspector could require a referendum to cover a broader area than that on which the NDP is based would make the whole process unworkable. This would mean that, for urban neighbourhoods in particular, if their plan mentioned secondary schooling that plan would have to be tested with a referendum across a far wider area. Presumably, if a London NDP mentioned traffic and transport issues, the referendum would have to cover most of the city. There have also been recent amendments about the voting procedures when a NDP is initiated or led by local businesses, ie, that two referenda should be run and that the local authority should decide between them if they generate different results!

This is all bringing the overall localism proposals into disrepute when an obviously preferable solution is available. If the aim is to ensure some form of democratic legitimacy for any NDP, the far better way to do this is to ensure rigorous and robust standards of engagement (not just of local communities) in community plan-making,

require a report of this to be submitted for examination with the plan itself and for the examiner to decide whether the case for community support is or is not sound. This has become familiar and proven practice on some strategic plans and projects and would have the added benefits of re-establishing community confidence in the status of their own plans and encouraging more people to engage early and fully. Should an examiner find that the plan is not sound in engagement terms, some form of referendum might then be appropriate.

There are (I was with one recently) communities in rural areas considering a number of choices about development sites, and a NDP may well be of value for them. This is, however, far less likely in London, leaving little that a NDP could then deal with. So, in summary, there is little that most communities might wish to do that a NDP could assist with, certainly not enough to warrant the considerable demands on community (and planner) resources and skills.

Neighbourhood Development Orders (NDOs)

NDOs can be dealt with very quickly. They offer one small variation on what is already available through Local Development Orders (LDOs), that is to enable a local community to actually take decisions on certain very minor planning issues. These might include extensions at the front of properties, additions to the roof at the front, porches (up to 5 square metres in one example) and certain shop signs/advertising. This could not apply in Conservation Areas. In a few cases that I know of where this is being considered (all rural) the local authority is insisting that a NDO can only be put in place once there is some sort of local policy context, for example a Parish (or Neighbourhood) Plan and a Design Statement.

Once again the bureaucracy involved in establishing a NDO (not dissimilar to that for a NDP) seems worryingly disproportionate to the benefits secured. There is then the issue of the responsibilities that would come with a NDO, for example if an application is refused and some form of appeal process proceeds – how would a Neighbourhood Forum deal with this?

Community Right to Build Orders

It is as yet difficult to say much more about Right to Build because the detail is not yet available. There may, however, be more scope for Community Right to Build Orders in London, although again the idea is drawn from rural practice. It is probably unlikely that a Neighbourhood Forum itself would wish to take on the responsibility of actually developing a project but they can be essential in shaping the need, local planning/design context and can then – through securing a NDO – give any smallish project permission (although how that would operate on highways issues, for example, is unclear). The development itself (If it was housing) could then be passed on to a body such as a Registered Social Landlord or to a body such as a (Community) Land Trusts. Such Trusts fit with other aspects of the Coalition's Big Society and are beginning to emerge across the country.

Others

Having covered what are most commonly considered to be the three main new opportunities, it is important to also comment on what the Localism Bill did not cover or

what has been covered that links to it. (For hopefully obvious reasons, I will not comment here on the removal of regional level planning.)

In terms of national imperatives, the NPPF takes a very pro-development stance, if not as radically as some critics have suggested. However, that and the very recent statements about speeding the process, might both appear to militate against more and better community involvement. This may be a correct assumption on the basis of so much poor involvement work that has too often delayed plans and projects, but it need not be true if one can make the argument and show that, based now on many successful examples, good involvement actually helps to speed processes. To suggest therefore, as some have done, that involvement needs to be reduced in order to speed processes is totally spurious and should be resisted. In fact it is precisely better quality involvement that will begin to shift traditionally cautious community views towards an understanding of the positive contribution that development can make (or perhaps prevent it if it is again of poor quality).

The Bill and the NPPF now make it clear that, in the future, there will be one key plan document for a local authority – a Local Plan, removing the portfolio approach of Local Development Frameworks. There is also a statement in the NPPF that suggests that there is unlikely to be support for many more Supplementary Planning Documents. (Interestingly, the NPPF fails to make it clear where a Neighbourhood Development Plan stands in this context.) More importantly, by setting just two levels of plan – area/authority-wide and neighbourhood – the NPPF could potentially cause serious damage to the many important intermediate levels, beyond the single neighbourhood, that have always been needed in urban areas, and particularly in London. It is in urban areas that the Area Action Plan model has been most effective and which will not be possible in the future. This is a very serious weakness.

As an aside, it is notable that the Localism Bill says nothing about Statements of Community Involvement, so it should be assumed that they will continue. The rhetoric around the Bill, as much as the Bill itself, makes clear the government's commitment to community involvement/engagement, which again makes it strange that there is no stated requirement for a Neighbourhood Development Plan to work within (at the very least) SCI standards, though that too can be assumed. In general, however, and despite the clear research results from recent years, there is no apparent intention to reinforce or improve involvement practice, which is disappointing.

The Bill makes a brief mention of pre-application engagement and this was followed up with a separate consultation paper on the subject. The paper stated the current intention to make pre-application engagement a formal requirement only on scheme of over 200 dwellings or 10,000 square metres. I am not aware of any feedback from the consultation process or of any final conclusion but the fact that such a high limit is being set for a requirement to involve is deeply disappointing.

It is probably also worth mentioning the approach being taken by the Infrastructure Planning Commission (if it is still called that). That is because there will be projects in London of such large scale and national significance that they fall under the IPC's remit. It is interesting to note that they have set out, and have already on occasion had to enforce, some relatively high standards for community involvement.

Finally, the Coalition has made great play of various forms of financial incentives to local communities to accept development. The two key formats are the New Homes

Bonus and the Community Infrastructure Levy (CIL). The former was originally promoted as something to go straight to a recipient community. That was quickly amended such that local authorities will manage the 'pot' and it remains uncertain how much would go to a local community. CIL is an adaptation of familiar forms of 'planning gain', attempting to legitimise it by making it more coherent and consistent. Once again it is uncertain what percentage of a CIL contribution might go to any recipient community.

4. QUESTIONS 1 TO 7

I felt it was important to set the overall picture as above because that forms a frame to my responses to the specific questions. These responses follow but I have tried not to simply repeat comments above.

1. How will neighbourhood planning work in London?

Although I have avoided commenting on the removal of planning work at the level above the individual authority, London is different anyway because there is, of course, an overall London plan. This leads to a new hierarchy of scale, status and precedence as follows:

- The National Planning Policy Framework
- The London Plan
- Borough Plans
- Neighbourhood Plans

The problem with this, as outlined earlier, is that there is a considerable gulf between Borough and neighbourhood, even if large (or even overlarge) neighbourhoods are assumed. For somewhere such as London there will be a continued need for forms of plan that fit between borough and neighbourhood, but as of now this does not seem possible. This is odd given that such an approach of defining areas etc. at local level is entirely in line with the Coalition's principles of not determining too much from above.

The benefit emerging from recent material from central government is that there is now greater encouragement and scope for plans for areas or issues that cross Borough boundaries and for more and better inter-authority working. Linking this to the earlier point there is scope, as we are already discussing with another city, to encourage neighbourhoods to work together; something that has rarely been achieved unless almost forced by an authority. In our example the aim is to agree, collaboratively with local communities, what issues are best addressed at what level, be that Borough, area or neighbourhood. This also brings the benefit that more broadly shared agreements can be made on behalf of areas where clear and robust community groups do not yet exist, implying that the establishment of new groups is a necessary stage to go through.

This in turn relates to the general point that (a) there will only be a relatively small number of communities, and formal groups within those communities, aware of and ready to start acting on the offer of very local level planning, (b) these are more likely to be the more up-together, wealthy and professionalised communities hence (c) this will further disadvantage those communities in greatest need of help and more often lacking formal groups.

In my view, simply leaving things to a first-come, first-served format can only increase social polarisation and reminds me of the example from many years ago of the Inner

London Education Authority setting up a huge programme of community education courses only to find that almost all places had been taken up by canny people from outer Boroughs! There is therefore a responsibility on London-wide and Borough authorities to put in place a coherent, overall programme of developing community structures and generating a rationale for prioritising resources to disadvantaged communities such that any neighbourhood plans or (whatever) work together into an overall programme. And it should go without saying that any such agreement must not be determined by the authorities alone but in collaboration with local groups, even if that is just those in existence now. Those involved in such discussion should probably also include many of the London-based NGOs.

The final stage in what is almost a sequence of suggestions is that there needs to be some form of network, rather as in Bristol, of neighbourhood planning groups to enable them to liaise between themselves, act corporately, share good practice, build capacity and generally gain added identity, clout and status, rather than always having to work through their local authority.

My 'new approaches' might therefore be:

- *Formal encouragement of plans at the level between Borough and neighbourhood.*
- *A structured and widely agreed strategy for creating new groups and setting priorities for neighbourhood level work.*
- *Establishing and supporting some form of 'London Community Planning Network'.*

2. What impact will the proposals have on local involvement in planning?

It is a key principle (or assumption?) of the authors of the Localism Bill that providing people with opportunities to plan at local level will not only bring many more into the process, both understanding better and acting more constructively on planning issues, but also raise awareness of more strategic level planning and hence the level and quality of involvement in it. The principle is broadly sound based on my own experience working at community level where it has become clear (as in many community development initiatives) that some people who become active on local issues will often move on to be more active on broader issues. (The flip side of this is that such people, who are often a minority, are also then often lost to the community as they move on more fully to those other issues.)

Taking this on, for those communities taking up the baton of a Neighbourhood Plan or other local initiative, the above benefits will still be generally available. However, unless the suggestions in response to question 1 above about an overall framework of support and priorities are put in place, there is a danger that the situation will become even more polarised than it is now, ie, that local planning will be seen (if it is seen at all) by disadvantaged communities as yet another initiative for middle class communities and therefore not relevant for them. While opportunities to date for local involvement have been occasional and ad hoc, the moment they are offered as a planned (indeed a statutory) opportunity for all then it is likely that the message will filter through that this is, in fact, not really for all. I have already experienced a little of this in Bristol in a comment from a student living in St. Paul's (one of the minor recent riot areas) that Neighbourhood Plans are not really for them but for people from Clifton!

In summary:

- *Taking learning from one (local) situation to another (a Borough plan for example) can happen and can increase willingness to become involved.*
- *However, this does not just happen. It needs to be deliberately managed, encouraged and supported (see 4B below).*
- *Without a coherent approach, greater social polarisation seems likely.*

3. To what effect will local people be able to realise their development priorities through Neighbourhood Plans?

A cynical response might be 'not at all' because of the requirement for Neighbourhood Plans to be "*in general conformity*" with the NPPF and Borough Plans. That is unless they seek more development than is in the higher level plan, in which case, any Neighbourhood Plan reaching its referendum stage and succeeding through that will have to be taken on by the authority.

This takes me back to the point about which communities are likely to be aware of, wish to and be able to advance Neighbourhood Plans – the more wealthy ones, and which will not – the more disadvantaged ones. I feel confident in saying that, in general, it will be the former who will not wish for any development at all or less than in any plan while it is the latter who (if they are even aware of the possibility) might be most likely to support or call for more development (by which I include not just new development but also initiatives such as estate renewal). And, of course, it is the latter communities where there is greater dependency on forms of now less available public sector funding or leverage to deliver that 'development'.

At the same time, there will still be a few communities where the limited scope of Neighbourhood Plans will seem to be exactly what is needed to ensure that the specific **nature, quality** and perhaps **location** of development is what that community wishes. I say 'seem to' because it is doubtful if engaging in the bureaucratic complexity of a Neighbourhood Plan is worth it for most situations and communities. It is far more likely that other alternative processes, for example a Local Design Statement, could achieve the same outcome more effectively.

In summary:

- *There will be very limited occasions when a Neighbourhood Plan is appropriate or worth the effort.*
- *It will, for many, be better to look at other options to secure appropriate development.*

4A. How will neighbourhood planning relate to Borough-wide and London-wide levels of planning? (Note that I have separated question 4 into two parts.)

I have already suggested (in 1. above) that there will still be a need for forms of plan at the levels between Borough and neighbourhood, even if large neighbourhoods are used.

The more challenging issue is about sequence. Ever since planning introduced different levels it has proved impossible to deliver what might seem to be the perfect hierarchy – top level first, then the next, then the next. In a truly bottom-up planning system plans would start at neighbourhood level and work up. In fact the Localism Bill and some of the supporting statements tend to suggest (despite the 'in conformity' point) that

strategic plans should build from what has been suggested at very local level, not the other way round. Unfortunately, of course, Neighbourhood Plans are being introduced when many of the Borough Plans are in place, developed without the sort of even more thorough engagement implied in the Localism Bill and without being able to draw on any neighbourhood level work. This, along with the 'in conformity' point, is only exacerbating local people's feelings of annoyance that they have been offered something only to see it snatched away. I do, however, know of communities and planners elsewhere in England already looking to formal plan review, such that communities are beginning to see value in having their Neighbourhood Plans in place to inform that review.

In some ways, however, the issue is – or should be – almost insignificant. If involvement in plan-making (whoever does the plan) was done properly and in a fully collaborative manner, then the whole process becomes one of evolution rather than the production of fixed, one-sided markers in the sand.

In summary:

- *The issue of the relationship between plans at different levels is best resolved by establishing more genuinely collaborative and evolutionary approaches rather than inevitably blunt hierarchies.*

4B. What support is needed for local communities to understand and take into account the wider planning framework?

The first step, of course, is very basic awareness raising, and not just awareness and hence knowledge of what the new approaches are to be at all levels but also something that actually convinces people that any time and effort that they put into engagement will be worth it. In a way, the latter is far more challenging given the level of (often justified) cynicism about 'consultation' in the past and the damaging messages now coming as a result of the 'in conformity' announcement. Without great effort being put into all levels of awareness raising then, as above, it will be the 'usual suspects' who are most apparent or who contact the authorities seeking support, rather than those who most need it. Removing the cynicism is a long, slow task and one I rarely try to tackle head-on at the start of any project because it can really only be done by demonstration – one has to genuinely show that things can be different.

Awareness raising needs to be integrated into forms and opportunities of community development in a way that has rarely been true in the past. I believe it can and should start in schools with study of the neighbourhood (which 'rings bells' in various areas of the curriculum, including citizenship) and then be an integral part of the unfortunately rapidly declining adult education service. Good capacity building should always also be an integral element within plan/project development (and be engaging, and enjoyable as well as challenging)

Once contact has been made to the point that people understand and value their opportunities, the types of support can vary considerably. It is far too easy to assume that this support is mainly technical. That is necessary (and people do have to learn a few more words and terms) but the necessary support is usually much more about helping them as a group of people to manage their time, secure the widest possible buy-in, be able to work alongside others with potentially different agendas and views

and, most critically, to build their capacity to deal with those in traditionally more powerful roles than theirs.

This then leads to the other half of this question. When professionals talk about capacity building they usually assume that it is others, especially communities who need it. That is only half true. If professionals – and elected members – are to provide the sort of support listed above, they too need to develop a whole new skill set based around (but not limited to) facilitation. It is shameful how little planners in particular, even since the 2004 Act, are taught in their initial training about engagement, and they are certainly not trained in even the basics of facilitation. This needs rectifying as a matter of urgency (and there are enough courses in London to make a difference on this front) and there is, of course, all the wonderful and long term experience of Planning Aid for London to draw on. Once beyond initial training there are a number of courses available (and I have run many of them) about engagement generally, consensus building and facilitation – for members as much as officers.

Summary:

- *There are key steps to take about awareness and trust that have to be taken before offering 'support', and this is all a long slow process.*
- *The types of support needed by communities are far more than just technical.*
- *Officers and members need their capacity built on engagement ideas and methods as much as communities.*

5. What do you see as potential solutions to the problems and barriers identified?

I believe that these have all been addressed in other sections of this submission, notably in the short summaries to these 7 questions.

6. Is there a need for new and innovative ways of providing advice and support to local communities?

There is always scope in any area of work for 'new and innovative ways'. In this context there are several key points to make.

First of all, "don't reinvent the wheel". There are, no doubt across London and certainly across the country as a whole, all sorts of examples of innovative ways of engaging with people and offering advice and support. Some sort of assembly/compendium of these would be valuable.

Secondly, a qualifying point. There has almost certainly been too much emphasis on 'tricks and techniques', on fashion and on 'patent medicine' methods – Planning for Real a few years ago, then Future Search, now Enquiry by Design. The most important area of thinking about good engagement, good advice and good support has been very minimally covered; that is the generation of coherent, planned, overall approaches or processes for working with people. In a sense, there is no such thing as a good method because any method can only be as good as the process it is set into. Furthermore, in anything as complex as planning and communities, there is no such thing as a good method; methods (plural) are always needed; which is another argument against the quick fix, one event format of things like Enquiry by Design.

Thirdly, there are certainly whole new areas opening up through IT. The use of interactive websites, blogs and twitter (etc.) all have their potential value and they are, of course, changing almost daily. Nor is this limited to the young, though any process that does not use such methods will never any longer reach the young. At the same time, the core of successful collaborative planning, conflict resolution and consensus building is about bringing people together face-to-face to explore issues and ideas in depth – something that goes totally against the whole nature of (for example) twitter. There are some approaches that introduce more dialogue-based methods electronically but their use has, to date, been very limited.

Finally it is important to move up a level beyond just ad hoc support to ad hoc communities. Most developers and certain communities may well only be involved intensively in one or two specific projects in any local authority area. The local authority, however, has lead responsibility for all statutory plans, and planners and councillors would play a role in all projects when collaborative approaches are used. Rather than deal with every situation as a one-off, there is a responsibility on any authority to demonstrate leadership by ensuring that what is done on every plan and every project is consistent, robust, principled and as effective as possible. More so than for specific communities or business groups, larger organisations can make significant resource savings over time by being consistent.

Local authorities have been encouraged for some years to produce some form of 'Engagement Strategy'. Some have done so (Tower Hamlets and Lewisham have good versions), though several of these are more guides on how to do it than strategies that provide an overall framework. What is suggested here for all planning work is a short, sharp '**Collaborative Planning Strategy**' supported with action to gear it up for delivery and action on the ground. Having a strategy in place (and using it) is a classically effective way to build capacity, develop skills and maximise resources, which then increases community, business and developer confidence and saves in the medium term.

Summary:

- *Developing a compendium of valuable and exciting, engaging methods is important.*
- *However, methods alone cannot solve anything; there is a need for coherent processes.*
- *Newer methods based on electronic communication have a role to play.*
- *Fundamentally, if everything is totally ad hoc, money will be wasted and confidence lost; some form of authority-wide strategy is needed.*

7. What are the practical implications of neighbourhood planning for proposed development?

Regardless of any cautions raised earlier about the new initiatives in the Localism Bill, there is little doubt that the way in which proposals for development will emerge, get incorporated (or not) into plans (at whatever level) and are then taken through the development management process will change and that change will focus on forms of greater and better community engagement, if not self-prepared plans.

It is almost certain that, in the current changed policy climate of Big Society and Localism etc., people will no longer be happy for 'the Council' to produce plans

dictating development proposals to them or for developers to proceed to application stage without proper pre-application engagement. How this all plays out in the plan-making process between better engagement in strategic planning and the production of some Neighbourhood Plans remains uncertain. It will also probably vary between Boroughs, especially in relation to the stage reached to date on strategic plans. Hopefully, what has been suggested several times in this submission, ie. that the 'usual suspects' will play a greater role at the expense of disadvantaged communities, will turn out to be an unjustified fear (especially if the issue is addressed) but demands on officer and member time will increase, probably dramatically.

Once any proposal is in a plan, the next stage is pre-application engagement. Despite the Coalition's retreat from what was in Open Source Planning in favour of requiring pre-application engagement solely on very large schemes, there is scope – as the Bristol example shows – for a robust London-wide initiative to make pre-application engagement such an obviously good thing that formal requirement become unnecessary. That is, of course, only possible if a coherent approach is put in place and if it is supported by all parties. This is not a recipe for overlong and tedious engagement processes on tiny projects but for the format to be 'appropriate and proportionate'. The mechanics are simple and are something I myself have managed to put in place on several occasions. On 'day one' a developer approaches the local authority for a meeting. If there is a relevant community group in the area where a development is to take place they should be met at the same time. At that meeting (or meetings) the engagement process is discussed and agreed to the point of a written proposal lodged on the council's files. From there on the developer pays for and runs the engagement with support from the authority and the community – almost in a protocol format as with Planning Performance Agreements. Once a proposal is complete it is submitted as an application accompanied by a full report demonstrating that the engagement has been completed as agreed and that key points have been taken on board. It can then (though this is currently debatable in law) be possible for the application to be refused if the engagement has not been done as agreed. (This is, of course almost identical to the procedures for Environmental Assessment!)

31 August 2011

Dear Ms Beer

Review of community involvement in planning in London

We write as the Putney Society in response to the letter entitled "Review of community involvement in planning in London" dated the 25th July 2011.

We are the amenity society for Putney and have in excess of 1000 family memberships. We estimate that we represent about 1600 residents.

Our comments reflect the views of our members in Putney and our dealings with Wandsworth as our local borough council.

We answer each of your questions in turn:-

1. **How will neighbourhood planning work in London? What new approaches are needed to reflect London's unique situation?** Response – yes they will work in London if local councils show a willingness to work with local people. Neighbourhood planning is intended to let local people have a significant say in the shape of their neighbourhood. This does not just mean deprived areas, it means that other areas are also entitled to retain and enhance the characteristics that make them attractive areas to live and work.
2. **What impact will the proposals have on local involvement in planning?** Response – If genuinely allowed to flourish, it will deliver positive engagement from residents who will feel that they can indeed have an influence upon the shape of their environment rather than having the council's view forced upon them. At present many people feel that they are wasting their time engaging with the current processes. The current uncertainty about the state of the proposed changes to the Localism bill about how businesses will be allowed to engage in the neighbourhood planning process is however casting doubt about whether residents will now in reality be allowed to shape their areas or whether businesses (chains in particular) will end up dictating to residents what is good for them as the council does at present. (The Tesco plan).
3. **To what extent will local people be able to realise their development priorities through neighbourhood plans?** . Response – To no less an extent than if an LDF or Development Plan is in place from a borough council and the guidance in the document is honestly followed and not subverted by officers and members of the Council.
4. **How will neighbourhood planning relate to borough-wide and London-wide levels of planning? What support is needed for local communities to understand and take into account the wider planning framework?** Response – This is little different to the situation that currently exists where each area is negotiated by council officers discreet area by area. There is a need for council officers to provide positive assistance to neighbourhood groups to negotiate their way through affordable housing target allocations in particular. There are however massive opportunities for disenfranchised council officers and members to obstruct neighbourhood groups in this arena.
5. **What do you do in your area/group/organisation to get involved in the planning system?** Response – Our Society has a very active group that is concerned with the built environment. The group meets monthly and holds well attended meetings every 4 months to engage the full membership with planning matters. The group has been heavily involved in the consultations on the development of the LDF, attends all Planning Committee meetings, reviews all planning applications submitted to the council and lobbies for changes and improvements where it is felt necessary.
6. **What do you see as the main problems for local communities in engaging with the planning system currently?** Response – The council consults but pays little attention to the results where it does not suit their purpose. The council exhibits a "council knows best attitude". This is driven in part by the need to cram developments to obtain more council tax and government incentive to build bonus in order to maintain a low council tax and maintain political power at all costs to the disadvantage of existing residents.
7. **What are the main obstacles and barriers for community led plan making in your area?** Response – a. manpower to get the process up and running b. the obstacles that we expect

council members and officers to put in the way of local groups who will in effect take away some of their power if it is transferred to grass roots democracy. (Wandsworth currently turn their back to neighbourhood planning)

8. **What would you like to see changed in the way local communities can influence planning policies and planning decisions in London?** Response – a. Make local borough councils accountable for genuinely reflecting the results of consultations in their planning policies and decisions AND then genuinely abiding by those policies. (Wandsworth have ignored many recently set major policies in every major development approved in Putney in 2011). This would remove a significant part of the reason for neighbourhoods to have to set up their own plans. b. clarity with regard to how the legislation is really going to end up, particularly with regard to how businesses (particularly powerful chains selling to a captive audiences) are going to be allowed to subvert neighbourhood planning for their own purposes.
9. **Do you think that proposals for neighbourhood planning can achieve a positive change and lead to a better involvement of the public in London?** Response – Yes

We would like to participate in the September online reviews and the public hearings to which you refer.

Yours sincerely

Putney Society lead for the review of opportunities for neighbourhood planning.

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NBH016 BioRegional

Sent: 31 August 2011 16:12

To: Alexandra Beer

Cc:

Subject: Re: London Assembly Review of Community Involvement in Planning in London

Dear Planning and Housing Committee,

Many thanks for your request to respond to the new opportunities and procedures for community involvement in the planning system. We have the following responses to the questions you posed.

1. How will neighbourhood planning work in London? What new approaches are needed to reflect London's unique situation?

London neighbourhoods are likely to be significantly more socially and economically diverse/fragmented than elsewhere in England, and therefore face significant challenges in forming groups with the cohesion, legitimacy, and leadership to exercise their new planning powers. This unique situation will require approaches which concentrate on building consensus and mitigating conflict, but at the same time must look beyond this to support people in developing the shared values and vision that will be necessary to guide the neighbourhood planning process.

2. What impact will the proposals have on local involvement in planning?

Opportunities

- Empowerment of local people to develop their own proposals that they have reason to value;
- Release into community use of underused or unused assets;

Risks:

- Perception that the strategic decisions are out of local people's hands, leading to frustration and disempowerment;
- Capture of strategic decision-making by communities focussed on preserving narrow sectoral interests;
- Lack of community capacity (skills, time, finance) to realise the opportunities;

3. To what extent will local people be able to realise their development priorities through Neighbourhood Plans?

It depends on what is meant by 'development'. People will not necessarily perceive their Neighbourhood Plans as simply about bricks and mortar: they are likely to consider them as a statement of intent for the kind of neighbourhood they are committed to making, in terms of neighbourhood management, human and community development, quality of life, environmental issues, education, health, and other social issues. Yet Neighbourhood Plans appear to be framed narrowly within the Local Development Framework, rather than (potentially) being an instrument through which to realise the aspirations of the more broadly based Sustainable Community Strategies.

4. How will neighbourhood planning relate to Borough-wide and London-wide levels of planning? What support is needed for local communities to understand and take into account the wider planning framework?

At the moment, the situation is entirely unclear. The new Draft National Policy Framework seems to suggest that Neighbourhood Plans will have the scope to supersede Local Plan policies (§50-51, p.13). What is needed firstly is clear legislation and guidance from central government on what the scope of neighbourhood planning is; only then can one clearly identify the support needed to communities in developing their neighbourhood plan.

Yours sincerely,

Conor Moloney

on behalf of

Neighbourhood Planning Team, BioRegional.

17th August 2011

Dear Ms. Jones,

Review of Community Involvement in Planning in London

I refer to your letter dated 19th July. My comments are as follows:-

1. It is not clear from the Localism Bill how exactly neighbourhood planning will work both in terms of neighbourhood "creation" and the preparation of neighbourhood plan.

Neighbourhood plans will need to be in general conformity with the Borough's Local Plan which in turn needs to be in general conformity with the London Plan and national guidance. It is not clear how a neighbourhood plan which seeks to reflect different priorities will be capable of adoption.

2. Although designed to encourage and strengthen local involvement in planning, there is at least a risk that local people will be alienated. Only 21 individuals (none of whom need to live in the neighbourhood) can initiate a neighbourhood designation. There could be cases where the motives of this group will be at odds with a long established residents group with the obvious potential for dispute and disagreement.

3. The main thrust of the neighbourhood planning process would seem to be to promote development. It is not clear how it will support neighbourhoods where development is much less likely to be acceptable. Conservation areas, character areas in suburban London and the Metropolitan Green Belt are examples where neighbourhoods will want support to restrict inappropriate and unsustainable development. It is not clear how this will be achieved.

4. See 1 above.

5. At present local communities engage with planning in two interrelated ways which operate very effectively. Firstly Ward Members keep in very close contact through their surgeries with individuals and through their residents associations with the wider community. Secondly residents associations and individuals directly interact with the planning department and the applicants and agents for major developments are encouraged to consult local residents directly ...

6. The question implies that the current arrangements as described in 5 above are not encouraging public involvement. That is not Bromley's experience and more encouragement of the existing arrangements would seem to be just as effective as pursuing the current uncertain/unclear proposals for neighbourhood planning.

7. The key difficulty is likely to be funding. Unless nationally there is a financial commitment to providing the necessary funding and unless that funding is targeted it may be difficult in practice to extend the current approach.

8. The practical implication should be the same as the benefits achieved by good practice that already exists. A committed Statement of Community Involvement, good pre-application consultation by developers and full and open consultation both in

development plan preparation and the processing of individual applications should already be achieving the desired end result which is community engagement and ownership.

Yours sincerely,

Marc Hume
Director of Renewal and Recreation

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NBH018 Town and Country Planning Association [TCPA]

Attention of: Alexandra Beer
London Assembly,
City Hall,
The Queen's Walk, London SE1 2AA
alexandra.beer@london.gov.uk

1st September 2011

To Whom It May Concern:

Re: London Assembly's Review of Community Involvement in Planning in London

The Town and Country Planning Association (TCPA) welcomes the opportunity to make a submission to the London Assembly's Housing and Planning Committee to help inform its review of community involvement in planning in London. We make our contributions under the following headings:

Policy and practical implications of the Localism Bill's Neighbourhood Planning Provisions for London

The Localism Bill introduces a new legislative process for community planning through Part 5 Chapter 3: Neighbourhood Planning with supporting Schedules 9 to 12. In its briefing for the House of Lords, the TCPA made the following conclusion, "*The new neighbourhood planning system is procedurally complex and will be costly for communities and democratically unaccountable outside parished areas*"³.

The process of neighbourhood planning in London will be unique for several reasons, which the TCPA believes the Committee should explore in its review:

1. Neighbourhood planning proposals will be initiated by Neighbourhood Forums, most likely at the electoral ward level⁴. But there are already a number of established local partnerships based on, for example, key regeneration areas which may make more 'spatial' and practical sense.
2. London retains its strategic planning document, the London Plan, and therefore neighbourhood planning adds another layer within London's planning policy framework for local communities to engage with. For example, the neighbourhood development plan will need to be in conformity with both the local plan and the London Plan.
3. The Mayor of London has new powers to designate Mayoral Development Corporations (MDC) and Areas under Part 7 Chapter 2 of the Bill, which takes planning powers away from boroughs to the MDC. This may undermine the process and good intentions of localism and neighbourhood planning.

Resource implications

The TCPA recognises existing good practice in community involvement and engagement in planning, in particular through the support and resources provided by Planning Aid in London (PAL), an organisation that was established by the TCPA in 1973 alongside the national Planning Aid, to give free independent planning advice. However, the Assembly would be aware that central Government's funding cuts to the Department for Communities and Local Government (DCLG), have resulted in budget cuts to the national Planning Aid and PAL, have

³ TCPA, June 2011, The Localism Bill and the future of planning. TCPA Briefing for the House of Lord, www.tcpa.org.uk/data/files/resources/1045/Lords_Localism-Bill-Briefing_June2011.pdf

⁴ Bob Neil at the RTPI's Politicians in Planning annual conference in Sheffield, 6 November 2010. See also DCLG Neighbourhood Planning Impact Assessment, January 2011.

had a significant impact on their regional operations and availability to support to local communities and individuals. Other community support networks such as JustSpace provide important grass-root level support with little financial support and significant volunteering time.

The TCPA also highlights the costs associated with neighbourhood planning, i.e. setting up Neighbourhood Forums and the process of adopting Neighbourhood Development Plans. DCLG's impact assessment places the costs from a minimum of £17,000 to £200,000. The Committee should examine the barriers for community involvement in neighbourhood planning in light of these costs, including the ability of boroughs to absorb all or part of the costs, as well as the advantages and disadvantages for diversifying funding from the private sector.

Positive lessons for the future of community involvement in planning

The Committee should be aware that organisations and boroughs have continued to engage positively and effectively with communities in planning; learning lessons from mistakes and removing barriers, even in times of uncertainty from planning reform. The TCPA highlights key projects for the Committee's attention:

- The TCPA led a pan-European project on community involvement between 2005 and 2007. The APaNGO (Advocacy and Participation of NGOs in Planning) project⁵ was devised as one of the first European Union action research projects on community participation in planning and development. Its underlying philosophy was the importance of fostering constructive community engagement in order to help deliver sustainable development on the ground. As a partner, PAL delivered demonstration projects including the development of a Greater London Authority (GLA) community involvement toolkit and topic-specific workshops.
- In partnership with PAL in 2010, the TCPA delivered a community workshop on participating in an Examination in Public including a mock EiP session chaired by Chris Shepley. The positive outcome from this one-off community workshop is encouraging for a sector that is trying to have its voice heard and to be taken seriously through the planning process.
- The TCPA led a pan-European project on planning and climate change adaptation from 2009 to August 2011. One of the objectives of the GRaBS (Green and Blue Space Adaptation for Urban Areas and Eco-towns) project⁶ was to improve stakeholder and community understanding and involvement in planning for adaptation. As a partner, the London Borough of Sutton was able develop a community engagement on adaptation which helped to inform its consultation processes for the Hackbridge sustainable suburb development.

Through the TCPA's history and recent experience in community involvement in planning, both nationally and in London, it was clear that there is a need to find innovative ways of reaching all sectors of the community – for example young people and hard-to-reach groups. These innovative techniques could extend to the use of community media, branding techniques and street based and cultural activities where communities judge these appropriate or helpful. However, in a time of change to the planning system, a more simple level of communicating basic information on the purpose of the planning system and the impact of planning reforms is likely be needed.

Concluding comments

The TCPA supports and welcomes the Housing and Planning Committee's review into community involvement in planning in London, and will be happy to assist the review where possible. In order for the review to be effective, in addition to highlighting existing and potential

⁵ <http://www.apango.eu/>

⁶ <http://www.grabs-eu.org/>

barriers for local communities, it must also highlight positive lessons which may be useful in informing the review's recommendations. This can be best achieved through the use of recent case studies. The review should also be realistic and practical about the implications of planning reforms on the ground, and work closely with the Mayor of London to ensure local communities continue to play, and develop further, a crucial role in shaping the sustainable future of London as a world city.

About the TCPA

The Town and Country Planning Association (TCPA) is an independent charity working to improve the art and science of town and country planning. The TCPA puts social justice and the environment at the heart of the policy debate. We seek to inspire government, industry and campaigners to take a fresh perspective on major issues, including planning policy, housing, regeneration and climate change. We promote our charitable objectives through planning policies that:

- secure a decent home for everyone, in cohesive, well designed communities;
- empower communities to influence decisions that affect their future; and
- promote high-quality development through better planning of the use of our land.

Please do not hesitate to contact the Association if the Committee has further queries on matters relating to this submission.

Kind regards,

Kate Henderson
Chief Executive

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Hampstead Garden Suburb Residents Association

GLA Review of Community involvement in planning in London

1 Hampstead Garden Suburb is part of a slightly larger Conservation Area under LB Barnet jurisdiction but the Suburb itself is subject to a legal Scheme of Management by the Hampstead Garden Suburb Trust which, in addition to general estate management, is concerned with approving all proposals which come under the general planning requirements and works in parallel with the LBB. The Trust has its own professional staff and is controlled by its Trustees, four of whom are appointed by the Royal Institute of British Architects, The Royal Town Planning Institute the Victorian Society and the Law Society and four elected members of the Trust, membership being open to those who have been resident in the Suburb for more than three years.

2 The Hampstead Garden Suburb Residents Association appoints three members to serve on the HGS Trust Property and Plans Committee and three to serve on the Conservation Area Advisory Committee of the LB Barnet. These representatives are normally members of the RA Conservation and Amenities Committee. The HGST Scheme of Management does not give it powers over publicly owned or controlled roads and open spaces within the Suburb, and therefore the RA has drawn up a set of Design Guidelines for the Public Realm in partnership with LB Barnet which are followed by the relevant LA departments including planning in order to maintain appropriate surfacing, reduce street clutter and control installations such as lighting, signing and communications. The RA also has a Trees and Open Spaces committee which liaises with the LB Barnet and the Trust as necessary to preserve trees and maintain both the open spaces under LA and Trust control.

3 Planning in the Suburb generally is subject to a set of Design Guidelines drawn up between the LB Barnet and the HGS Trust as a result of a comprehensive Area Character Appraisal carried out by a group of local volunteers with the strong support of the Residents Association and the Trust.

4 Whilst the foregoing indicates a level of resident participation in the planning process which might be taken as exemplary, there are issues which cause concern, mainly due to the LA planning process whereby planners' recommendations and those of the CAAC can be overruled or ignored by councillors on the Planning Committee. Appeals against refusal of consent may be heard by inspectors with little or no knowledge of the particular local conditions and a similar situation may arise where applicants take legal action against the Trust for refusal of consent which may happen when the LA grants and the Trust refuses consent. This situation should not arise if the Design Guidelines are followed and upheld equally by the Trust and the LA. This would require councillors as well as planners to be fully aware of the guidelines.

5 Since there is no scope for major development in an already closely planned and developed Suburb, there is no real need for a community-led plan. However, due to constant pressures, largely economic, it is seen as essential that the RA and the Trust maintain strong vigilance both over current developments (eg basement construction) and trying to face up to developments like the demands for energy conservation.

6 The HGS Residents Association warmly endorses the GLA initiative and very much wishes to be kept in touch with its progress and outcomes. As you will have gathered, we have our problems and would welcome any guidance as to how we might better resolve them and so strengthen the engagement of the community. At the same time we

would be very glad to let you have any further information about our own experience if you would find it helpful.

2 September 2011..

1. How will neighbourhood planning work in London? What new approaches are needed to reflect London's unique situation?

The London Borough of Bexley understands that, as the Localism Bill stands, if an area does not have a parish or town council, Local Authorities will be able to appoint new Neighbourhood Forums. Schedule 9, 61G of the draft Localism Bill defines Neighbourhood areas 'as an area within the area of a local authority in England which has been designated by the LA as a neighbourhood area'. Further guidance, in terms of clarity and detail is required as to the criteria for establishing both neighbourhood area's and neighbourhood forums, particularly whether the council should be mapping 'areas that are for the time being designated as a neighbourhood area' before any organisation comes forward asking for neighbourhood forum status. Designating neighbourhood areas will be quite challenging in an urban/suburban context where there tends to be no clear distinctions between neighbourhoods.

Bexley Borough contains areas with significant development opportunities and yet has communities that face high levels of deprivation. Such communities would need to be empowered as they may lack the capacity in terms of resources and knowledge to participate in the development of their own neighbourhood plans. This could have associated resource implication for the Council, as it attempts to assist such communities. There may also be a challenging role for London Boroughs to liaise with communities who wish to resist change rather than contribute towards it.

2. What new impacts will the proposals have on local involvement in planning?

Further to the above response, Bexley supports the view that the Localism Bill will give local communities the chance to influence growth and development in their areas by creating neighbourhood plans. However, those who seek to resist growth may become resentful as they realise that neighbourhood planning primarily seeks to deliver existing growth targets.

Bexley also has concerns on the inclusiveness of participation methods that Neighbourhood forums will use in the preparation of their neighbourhood plans and policies, particularly the hard to reach groups. A consultation framework subject to planning regulations, similar to Local Development Framework consultation processes, will not only ensure better local involvement in planning but transparency and accountability in neighbourhood planning.

3. To what extent will local people be able to realise their development priorities through Neighbourhood Plans?

Neighbourhood Plans will theoretically ensure that local people are able to contribute to development in their communities and identify land uses that are best suited to their local needs. However, there is likely to be some dispute between residents and businesses regarding this issue. For instance, it is inevitable that some residents will want to resist growth in their area whilst businesses may wish to expand and develop. Particular difficulties may also occur when trying to resolve conflicts such as land contamination remediation where consultation alone may not be enough to resolve arising issues. Bexley recommends that detailed mechanisms be considered to resolve these potential conflicts.

There is also significant concern that the draft legislation makes the presumption that land is widely available for communities to develop. Although new rights will be introduced through the 'community right to build' and 'community right to buy' provisions, these are unlikely to provide the necessary power and access for communities to develop land in all circumstances. For instance, the majority of land available for development is in private ownership and local communities may have difficulty in persuading the owner to release the land for development. The use and development of land is also dictated by market conditions and not necessarily the desires of the local community, potentially allowing neighbourhood planning to raise false expectations. Bexley suggests that

consideration is given to what mechanisms will be made available to local communities to ensure they can obtain and bring forward land for development.

4. How will neighbourhood planning relate to Borough –wide and London –wide levels of planning? What support is needed for local communities to understand and take into account the wider planning framework?

Further to the above responses, Bexley agrees that Neighbourhood Plans should be able to help shape and direct development in a locality. Support may be necessary for communities to be clear on legislative requirements, including the need for conformity with existing development plan policies. Current proposals for neighbourhood planning require local authorities to set up and provide technical support to the neighbourhood forums under the Duty to Support provisions. Bexley is concerned that there will be significant resource implications for the council. Funding is likely to be necessary in order for Bexley to provide the level of support and guidance local communities will require to produce neighbourhood plans especially in the light of resource constraints affecting the council's strategic planning function.

5. What do you see as the main problems for local communities in engaging with the planning system currently?

Bexley supports the reforms set out in the Localism Bill that introduce a bottom-up approach to decision making in the planning process whilst allowing local communities ownership of their plans. Such ownership is difficult to achieve with the current system. The current Local Development Framework system has not only proven complex and difficult to understand but also the suite of many documents leads to confusion, particularly in joint consultations, where members of the community fail to differentiate the different purposes of the documents. Members of the community have also raised concerns over the constraining nature of the statutory requirements associated with the LDF consultation process e.g. timeframes in which they can give their responses and issues of consultation overload.

6. Do you think the proposals for Neighbourhood Planning can achieve a positive change and lead to better involvement of the public in London? What else is needed?

Neighbourhood planning is likely to have a positive impact on local involvement in the planning process and should enable local communities to better understand and become better involved in the planning system. However, proposals for Neighbourhood Planning are very specific in remit and are development led rather than promoting better involvement and integration of local communities in the entire planning process. Further guidance setting out the consultation process for neighbourhood plans, i.e. who will be involved and how they will be consulted, is required.

7. Is there a need for new and innovative ways of providing advice and support to local communities and what could these look like? Who should (and can) be involved and how could support be funded?

Local communities will need to gain an understanding of the existing development plan for an area in order to produce Neighbourhood plans that are in conformity with local policies. Local communities will need capacity building programmes such as workshops to ensure effective empowerment, especially those that are economically and socially disadvantaged. They would require support and training to help them bring forward planning initiatives. Advice and guidance could be given by organisations with expertise in planning, although such organisations would still require resources to provide assistance to local groups intending to develop neighbourhood plans. Even though funding is available for such purposes through the CLG's Supporting Communities and Neighbourhoods in Planning fund, Bexley is concerned as to how these funds will be distributed and feels more guidance is necessary on this front.

8. What are the practical implications of neighbourhood planning for proposed development? For example regarding the level of engagement and consultation between developers or applicants, local planning authorities and local people.

At this stage it is difficult to identify the implications of neighbourhood planning for Bexley because of the broad nature of the Localism Bill and the fact that neighbourhood areas within the borough are yet to be defined. There could be however, a need to limit expectations of local communities until they have a greater understanding of the Localism provisions, as well as greater understanding of policy, development and market processes. Bexley appreciates that further guidance containing more detail is likely to come forward in the near future but the current lack of detail makes it difficult to outline all the practical implications these changes are likely to have on the borough.

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DATE:
2NDSEPTEMBER 2011

Dear Ms Jones

Review of community involvement in planning in London

Thank you for inviting me to contribute to your review. My responses to your questions draw on my 15 years experience of professional practice in the built environment in London as an Architect, an urban designer, a public sector regeneration client and as a University researcher. In particular, having worked in these quite different roles, I am most concerned about the lack of effective communication that currently exists between the different stakeholders in planning, development, use and maintenance of the city. I am currently leading an applied research project to explore how Neighbourhood Planning could open up new opportunities for better community involvement in planning and for planning to be more sensitive to individual places.

Neighbourhood Planning and the Localism Bill

It appears to be fairly widely accepted that the Localism Bill has been conceived of with the limited expansion and development of villages and towns in mind, rather than the continuous processes of change in cities and the complexity of the forces at play in London does not appear to have been properly considered in the preparation of the Bill. The support, both financial and organizational, provided by Government also seems to be relatively insignificant to the scale of these challenges. The consequence of this appears to be a high degree of cynicism both within the professional and Local Authority arenas and within neighbourhood groups. This is unfortunate and I believe that the Bill offers great opportunities for the re-engagement between the different parties involved in the development of the city. From my many discussions with professionals, planning officers and community groups on this topic, it is clear that Neighbourhood Planning will not work to the benefit of any parties in its current form without such a level of re-engagement.

London is a special case

London is not only the largest, but surely the most complex city in the UK, due to its polycentric historical basis, resulting in quite distinct areas, or neighbourhoods in close proximity to one another. This means that the degree of control that regional and local planning is able to exert over the development of the city is perhaps weaker in London than anywhere else in the UK. This provides a unique opportunity, because the built environment in London is the result of a continuous negotiation between residents, businesses, developers, authorities and so on. Unfortunately, these different actors currently understand the built environment in very different ways and use very different language and representations to express their desires and proposals.

Shortcomings in the planning process

In my experience for example, the residents of a particular area who are consulted on a planning proposal do not distinguish between material planning matters and non-material matters (unsurprisingly) so residents may object to a development by one particular retailer

because of who the retailer is, rather than the form or the use-class of the development. The planning system does not provide a means for the non-material matters to be considered in other, appropriate quarters. As a consequence people become hardened to development proposals which allude to benefits that are not under the control of planning and are often not delivered.

As a further example, from a developer's point of view, development control in London presents an extraordinary risk. The 'residual value' of land is an appropriate mechanism to 'wash through' to the final purchaser, the extra costs placed on a development in order to achieve a planning permission. In an ideal scenario, the market would quickly establish the viability of sites, so that planning obligations could be adjusted if necessary to stimulate development, or increased if land values rise and difficult sites could be appropriately supported to ease their development. However, developer's estimates of residual land values fluctuate wildly, because the costs of gaining planning consent are so hard to predict in advance. This is exacerbated by local opposition arising from the example above. The result is a risk-averse approach to development which acts as a constraint and an upward pressure on the cost of housing and so on.

Finally, an example from the perspective of planners is the difficulty of balancing the need for investment in a given area, with the opportunity to press for appropriate benefits via the planning process (not only via CIL / S106 but in the form, functions and servicing of the development proposed). The GLA have employed various toolkits over the years to 'assess' the viability of schemes, but they all rely on subjective data, resulting in the general view in the development world that they are merely a hoop to jump through and hence limited in their effectiveness.

Opportunities

Neighbourhood Planning provides a unique opportunity to remedy some of these problems. Perhaps counter-intuitively, the complexity of London presents the greatest opportunity for innovation in the planning arena, which could and should have a positive influence on national policy. The approach that I believe is required is to establish a framework within which all these parties can operate together and positively negotiate the development of the city. This is a concept we have been exploring through our applied research project, funded by the University of East London, in conjunction with the masterplanning consultancy, think place.

Our starting point emerges from work we have been doing together with the US Green Building Council on their sustainability standard for Neighbourhood Developments, LEED ND. This standard has a remarkable level of adaptability, which gives it an ability to recognize the essential characteristics of a wide range of different kinds of place, including existing neighbourhoods in London. We have shown that it is more suited to this purpose than other more UK-specific benchmark schemes. Through our project, *An Open Framework for Sustainable Neighbourhoods*, we have developed a simple questionnaire based on thirteen standardised questions that can capture local residents' priorities in a LEED ND format. The result is both a unique profile of a given neighbourhood and a bespoke standard that can act as a brief and assessment tool for development proposals. We have tested out this tool with two neighbourhood groups: the Bermondsey Forum in conjunction with Southwark Council and Westbourne Green in conjunction with Paddington Development Trust and Westminster

Council. These pilots have shown both the viability and the utility of this approach, where it has enabled new communication between all the parties involved in a live neighbourhood development project.

The project work is freely available as a prototype for neighbourhood groups and our research work will continue to refine the prototype as it is put to wider use. Our next steps will be to begin mapping the findings on a GIS base so that they can be geographically compared via an online portal by any interested party.

As LEED ND is an internationally-recognised standard, our belief is that the expression of local needs and priorities in this format will give developers a greater level of confidence as to the requirements of development in a particular area. It will enable a case to be made for sustainable development, giving material weight in the emerging planning framework. It will enable planning departments to align local priorities with material matters in planning and communicate non-material matters to other parts of the Council and its partners. Perhaps most importantly, it presents.

a dynamic means for neighbourhoods to self-appraise which should enable more appropriate planning to proceed, rather than simply engaging neighbourhood groups directly in a technocratic planning process that doesn't necessarily address their needs.

I would be keen to discuss this work further and for it to be taken up by other Local Authorities and groups across London. Notwithstanding this, I believe that the shortcomings in the planning system identified in our work urgently need to be addressed through whatever means may be appropriate and I welcome your review into this important area.

An outline of our work can be found at **www.placeresearchlab.org.uk/SNP.html**

Yours sincerely
Roland Karthaus
Director
Place Research Lab CIC

Review of involvement in planning in London

I have also sent this letter electronically.

My comments, numbers 1-9, are in direct response to your questions 1-9.

1. I do not have an overall sense of what level of neighbourhood planning by the community is envisaged by the government. But there really can be no improvement in local participation unless local people have a decision making voice. If this is actually what the government want rather than the excuse to cut down on planning staff. It also presupposes that people will wish to be involved equally in all boroughs.

2. I sense that the property developer will have a far stronger voice than they do now because they will be able to influence local groups even more than councils and it would appear that the planning regs./laws will be relaxed.

3. It will be difficult for many local groups not to have a 'knee jerk' reaction to what might affect them in their immediate area, i.e. street, and not see even a slightly wider picture. They often display the same self centred attitude of most developers.

4. It will rely on the broadmindedness of the local people but:

- There will need to be a forum for discussion, review, agreement, with decision making powers, to feed into the borough's development plan rather than the consultation programme we have at the moment in the LBS.
- There will also need to be another forum to include the bordering boroughs, on which a cross section of representatives from the local areas meet.
- On these forums there will need to be council representatives with certain expertise, who are apolitical: an expert on current planning regs. & law; a Secretary to minute the meeting and circulate information; Someone to represent the financial dept. of the council; A lawyer.

5. I represent the Carshalton Society and Carshalton Water Tower & Historic Garden Trust.

- A representative on CAACG, Conservation Area Advisory Consultative Group, which looks at the planning issues in the Borough's Conservation Areas. We meet monthly. We sense that if the Council wish to accept or refuse an application our views if in agreement are quoted if at odds they are not taken into account.
- Attend the Carshalton and Clockhouse area meetings but the audience has no input into planning issues and is not encouraged to comment on them.
- Attend council meetings when there are planning proposals which I wish to comment upon. These may be Borough wide. But communication is often poor, giving very little time to respond.
- Attend the Wandle Valley River biodiversity and historic forum meetings, being very interested in the river and its development as a park.

- Lectures/seminars/workshops on Town Planning, locally, at the Building Centre, Urban Design London, etc.

6.

- Currently local people rarely have a strong enough voice unless they become extremely aggressive which is totally counter productive.
- Too small an area is notified of a planning application, only a notice in one local newspaper and notifying by post the immediate houses. The impact of a proposal often has far reaching effect.
- Decisions are made too often for political reasons which, too often, have nothing to do with that environment. Ward councillors need to consider the views of their ward members more and support their wards.
- Personalities often get in the way. Although the latter would be extremely difficult to eradicate when it is the 'home' that is involved

7.

- The expertise in: planning law, regs; general legal matters; secretarial support; knowledge of the council's financial background.
- I do not see many more people having the time or desire to be involved with planning issues than there are at the moment.
- Members of the general public may wish to sit on the necessary committees if this is to be a meaningful reality and not just a way to cut down on planning staff. But people will gather normally to reject a specific proposal but once the 'danger' has past they wish to get on with their lives.
- Eradicate the problem that when a development has been agreed that the developer sells on the site/plans and the new developers changes the plans and gets away with this.

8.

- Far more transparency on the part of the council & planning dept.
- A far wider spread of information about council development proposals, and sell offs, and that of private developers' projects whether in or out of a conservation area.
- A facility for developers' proposals to automatically go on display to the general public, possibly in public library, council offices, etc. so that people beyond the immediate area can be informed. The developer to pay for the cost of the display.
- More respect for conservation areas but this does not mean no development.
- Local Councillors pay more heed to the views of the peoples' point of view in their wards.

9.

- It could do if there is confidence that the local voice counts and there is a mechanism for people to have a decision making vote on proposals.
- There will need to be a change in the attitude in planning departments and of local councilors.

- However a developer can influence a local group as they can a council and in areas where, for whatever reason, people are unable to take part and form a meaningful local committee to deal with this matter, developers will have a much stronger voice than at present. Safeguards need to be in place to help these areas.
- I generally think it will be a good thing because too often a decision has been made to allow a development which does not enhance the area as by nature the developer normally wants the most cost effective development possible.

Thank you very much for this opportunity to comment on this matter.

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NBH023 Hatch End Association

[]

Sent: 03 September 2011 15:18

To: Alexandra Beer

Cc: []

Subject: Re: London Assembly Review of Community Involvement in Planning in London

Follow Up Flag: NBH023_Hatch End Association

Flag Status: Completed

For the attention of Alex Beer GLA by September 5 2011

I am the chair of our planning group for the Hatch End Association , founded in 1929 with 2000 members residents and some 50 business owners in Hatch End and district.

Q1 We consider the success of localism depends on the number of volunteers, from both residents and businesses in local communities, coming forward and prepared to take on more responsibility with clear support from local government. Unfortunately volunteers without their own agenda are thin on the ground.

Q4 & 6 Local communities need more support in accessing planning documents. Not everyone uses a computer and no-one wants to spend hours in front of a screen scrutinising documents. We find Harrow will no longer sell bound copies of consultation documents to community organisations or individuals. Consulting with a group is easier when participants sit round a table with their own copies.

Q5 Our planning -sub-committee of 3 people visits the civic centre every two weeks armed with a list of planning applications for our area. Usually about 8-10 applications to view. Harrow Council has provided a small room with two computers for local organisations to use and where they can view existing and proposed developments more simply
If necessary we comment on maybe 4-5 applications a month and bring all applications to the attention the full committee at out monthly meetings along with any consultations. About twice a year we have a meeting with the Director of Planning at Harrow to discuss any suggestions we have to improve online planning as well as any current local or national planning issues..
We hope these comments are of some help

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NBH024 Friends of Streatham Common

From: []

Sent: 03 September 2011 18:17

To: Alexandra Beer

Subject: Community involvement in planning in London -Review

Follow Up Flag: NBH024_Friends of Streatham Common

Flag Status: Completed

Dear Alexandra,

Thanks for your letter dated 25th July.

Currently we would get involved in planning if it impacted on the running of the Common or the Rookery – such as when we took part in the ‘ Hands off our Common’ campaign to stop a temporary ice rink being built on the Common- on occasions of emergency.

However, in the future we could only get involved in a more day to day way with substantial support as we have few volunteers – in addition we really think that one main barrier is the organisation of volunteers and their number and perhaps that we are not the best people to do the majority of the work on such projects.

Another major barrier to community led plan making is that many people prefer to leave this to paid staff – although I think there is great room for improvement as the process is some what long drawn out and clearly expensive.

Yours sincerely

Chair Friends of Streatham Common

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NBH025 [Member of the Public]

From: []

Sent: 05 September 2011 09:18

To: Alexandra Beer

Cc:

Subject: Planning study

Follow Up Flag: NBH025_ [Public]

Flag Status: Completed

Attachments: 050911-chancellor planning.doc

Dear Ms Beer,

When I first saw this I recoiled at the prospect of writing at length, mainly by definition anecdotally as almost every project I have been involved in over 40 years became bogged down in the Planning process otherwise known as Development Control.

The Osborne/Pickles article in the FT today and the news coverage prompted me to write so I attach a copy of my letter.

The point being that huge amounts of energy and effort, discussion and thought have to go into securing consent for a site. My impression is that it is nigh on inevitable in every case that a consent would be forthcoming or achieved. The process/problems are thus a huge waste of money, time, energy, creative thought all of which could be put to better effect.

As I say by definition examples are anecdotal but suffice to say this year I have 'renewed' 3 consents which expired. That in itself is a waste, but they expired solely because they took so long to obtain in the first place and so were not implemented due to the recession. A double whammy.

I hope this helps,

.

Letter to George Osborne, 05/09/11

Dear Chancellor,

Unusually I write to a Minister but am prompted by reports of your and Mr Pickles' article in today's FT on the need to reform the planning system.

What you propose is hugely and long overdue. But the reports, maybe not the article which I will read, miss the point that whilst reform will be a key part of recovery the lack of reform over many years significantly detracted from the economy. It must not continue.

To me as an architect, founding partner of a medium practice employing up to 17 persons, the huge waste of effort negotiating a reasonable planning consents for small(ish) entrepreneurs generating revenue for them, their employees, their investors and thus the economy was money going into a pit. Our firm suffered, but survived.

The direct cost of the planning system and process merely adding to that waste.

All that effort could, indeed should have been redirected to better ends.

I am now retired. I retired first some 10 – 12 years ago but with my planning experience was 'drawn back in' to help applicants charging on a time engaged. In that regard I could be grateful to the planners for generating a splendid boost to my pension. But I am aware that that came from the profitability of the projects.

Every application has been successful. They always should have been or would have been. It is that inevitability which puts into question the use and purpose or 'value' of the prevarication, obstacles put in the way and other delays every application encountered. In short at the outset I could advise a client there would be a consent but that it could be a struggle.

That begs the question: what purpose the struggle? All that effort on both sides should be better used.

Please do not be deterred. The Planning Process or Development Control has become a drag chain on proper progress.

Yours sincerely,

Cc Rt Hon Eric Pickles

NBH026 Open City

Open-City response to the

Review of community involvement in planning in London

by the GLA Planning and Housing Committee: Summer 2011

Question

1. How will neighbourhood planning work in London? What new approaches are needed to reflect London's unique situation?

Answer

Open-City welcomes the drive towards neighbourhood planning in principle, and support a focus on it's purpose – a more livable city – a better built environment. We are aware of neighbourhood plans being developed – in Paddington and Hackney for instance – and suspect that there is a latent demand. But, there are difficulties:

- Some discussions we have had suggest that London boroughs see the principle as being more applicable to rural/parish areas. Neighbourhoods in London are more complex, greatly overlapping and frequently across one or more administrative boundaries. Just in respect of this latter point, this raises issues of how local authorities should recognize neighbourhood groups, who should guide them and who should adopt their plans.
- Discussion also suggests that Councils feel that areas of significant local concern are often being addressed through existing or ongoing localized planning documents/systems, or are concerned that new forms of neighbourhood planning will challenge under-resourced departments
- Communities in London who may be immediately interested are likely to be organized around a specific issue, and known to Councils (e.g. conservation/heritage groups)
- New communities may take time to become set up and to become aware of the opportunities
- Recognition of the complexity of London's neighbourhoods and communities needs to be made in the Bill and guidance.

2. What impact will the proposals have on local involvement in planning?

Open-City are, in principle, very supportive of the idea that people should be more engaged in the planning process, more aware of the built environment, its impact and its benefits.

However:

- we are concerned that the proposals are a substantial step change in policy, with little or no provision of support to make them effective.
- A bad experience with the planning system can easily be off-putting.
- The proposed process remains bureaucratic, and it remains to be seen whether communities have the necessary drive, enthusiasm and momentum likely to be needed to see the process through.
- Having been sold on the basis of having some control over development, some communities will be let down by the requirement to promote growth and to fit their plans within the Council's statutory plans.
- As a result of the above point, communities still need to engage with the more strategic levels of planning

3. To what extent will local people be able to realise their development priorities through Neighbourhood Plans?

To what extent can any organisation realize priorities through plans?

Development process is complex and only partly influenced by policy. The free market in terms of both demand and funding are significant drivers, which may not be easily understood leading to confusion and dissatisfaction. Plans provide direction, aspiration and ambition, but need to be aware of the realities of free will and the free market.

Realising community priorities, e.g. through CIL, remains open to question. Local initiatives may garner the support of the Big Society Bank/Public Land Initiative or the new Rights to Buy/Build etc.

4. How will neighbourhood planning relate to Borough-wide and London-wide levels of planning? What support is needed for local communities to understand and take into account the wider planning framework?

- Third sector, independent and impartial organizations, like Open-City, will be vital in demystifying the world of planning and architecture to enable the playing field to be leveled for those undertaking neighbourhood plans – as long as resources are made available for this to be provided.
- Local capacity will be very uneven – raising question of equality. Further, the most articulate and engaged are not necessarily those in most need.
- Access to support for neighbourhood planning/understanding the strategic context needs to be free (or very affordable) and accessible (as an example, Council websites are varied in

- Build confidence, build understanding – Councils and communities have a need to understand each other, take the same language and take a responsible approach to delivering plans.
- Neighbourhood planning provides a good opportunity to check that current planning policy and proposals written “on behalf” of residents is in fact legible and transparent. Neighbourhood planners will need to understand the wider context as they develop their plans – they have to if they are going to move to adoption.

5. What do you see as the main problems for local communities in engaging with the planning system currently?

- Complexity of the system, and the wealth of information involved
- Despite trying to be transparent, the system is inherently bureaucratic
- Lack of time and resource, and the need for enthusiasm and momentum
- Lack of understanding of how and when to become involved
- Professional language
- Engaging with Councils who don’t necessarily see neighbourhood planning as a current priority, or as different to the current process of AAP preparation on local matters.
- For communities crossing administrative boundaries, there’s an issue of ownership – can one authority take responsibility/leadership, and what does this imply for the lead authority’s jurisdiction in the other authority areas (take Highgate - Camden, Haringey, Islington or Crystal Palace – Lambeth, Southwark, Bromley, Croydon). And how do communities cope with potentially different approaches to what they conceive of as a coherent community?

6. What are the main obstacles and barriers for community-led plan making in London?

There’s a difficulty in definition – what is a community and what is a community led plan?

There needn’t be barriers if the plan is a simple expression of a possible solution (to a responsible authority) to a perceived problem (of an existing community). But are the expectations of each party the same? And does the ‘system’ allow a common vision to be achieved – or does it remain bureaucratic?

London is a patchwork of communities, however. How do you develop a consensus between residents of any given geographic area of London, however large or small?

And so many communities (notwithstanding the point above) cross administrative boundaries -
The need for strategy – some things will always need to be considered above the level of the neighbourhood

7. What do you see as potential solutions to the problems and barriers identified?
How could they be developed and implemented in London?

Some of the barriers are political, or are inherent in the system being proposed, and are difficult to address from outside of the process.

In raising the capacity of communities to develop capability, there must be a role for agencies in raising the understanding of communities of good planning and design and in engaging in the planning process. This role could be filled by an impartial and independent body, and the third sector is well positioned to do this, Open-City among them.

Local champions and active residents should be nurtured. An understanding of how the specific issues fit into the strategic should be clarified.

8. Is there a need for new and innovative ways of providing advice and support to local communities and what could these look like? Who should (and can) be involved and how could support be funded?

There is scope for new and innovative ways of providing advice. Open City has been using a residents design review in one London Borough, which brings residents up to speed on design issues and why they are important. This allows them to then review significant schemes coming to the Council and to comment on them, and hence directly inputting into the planning application decision. Open-City is also looking at directly enabling Councils and communities in neighbourhood planning and localism issues and the impacts on them, though there is little funding around to support this.

Funding could be made available from Community Infrastructure Funds, section 106s and Planning Policy Agreements. Funding from Government could be more significant - £40K on the adoption of a neighbourhood plan – given the process – is little incentive and may not cover the costs of production. Funding might also come directly from developers, but there is an issue of independence and transparency once again – who is being seen to fund this and why are they doing it?

9. What would you like to see changed in the way local communities can influence planning policy and planning decisions in London?

The principal area of change that Open-City would seek is that of the involvement of young people. Open-City has a long history of working with both primary and secondary school children, and many of them have strong ideas about their environment and its use. The Young Planners programme in particular has demonstrated that young people in their mid teens have highly creative and innovative ideas about how their places should look, and have the will to express them. Of course, the referendums offer a chance for local people to vote on neighbourhood plans, but this referendum is based on the electoral register, thereby excluding some young people from having a say. With these people on the cusp of forming the next generation of voters and working people, there should be some way of allowing them a say on the final plans.

10. Do you think the proposals for neighbourhood planning can achieve a positive change and lead to better involvement of the public in London? What else is needed?

Greater involvement of the public in planning is necessary and valuable, but the currently proposed system seems unlikely to make a significant difference. Those that are interested in their environment are often already involved in some way, and the reason is often reactive or motivated by protection or preservation. Community groups falling outside of this are unlikely to find a largely bureaucratic process, which promotes growth and sits within the statutory plans of the Council, very attractive.

However, some communities are very busy making their own plans and lobbying their Councils about particular issues that affect them without recourse to formal process. There are good examples throughout London (Chatsworth Road, Paddington/Queens Park, Andover Estate), where incremental change is achievable for the betterment of places. Perhaps if it was clear that neighbourhood plans can be very short and very specific, rather than implying length, weight, procedure and process, it might be embraced by many more groups and communities (again, an expression of a possible solution to a perceived problem – see Q6).

11. What are the practical implications of neighbourhood planning for proposed development? For example regarding the level of engagement and consultation between developers or applicants, local

Given that neighbourhood plans have to promote growth, and fit within the plans of the authority, it's hard to know what the practical implications of neighbourhood planning might be, above and beyond the promotion of development in the form envisaged by the people who live there. In this sense, there should be a greater sense of ownership, contentment and agreement over the development coming forward and taking place.

planning authorities and local people.

Outside physical development, it should make communities more aware of the practical implications of good planning and its impact on everyday lives. It should bring a greater understanding of the system and greater civic engagement. However, given the bureaucracy involved, this impact may also be limited and small scale.

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NBH027 Age UK & Greater London Forum

This is a summary of responses from older forum members from across London:

**Response to the London Assembly Review of Community Involvement in Planning in
London
Age UK London/Greater London Forum August 2011**

- 1) How will neighbourhood planning work in London? What new approaches are needed to reflect London's unique situation?

It will hopefully empower the local communities to take an active part in the decision making processes from the beginning to the end .

It is important to keep in mind that the planning processes must reflect the local, national and international prospective as it cannot be successful in isolation

All new social housing of more than one bedroom to be build on outskirts of London, leaving one bedroom flats for older people who need to be nearer the centre for many reasons: transport, hospitals etc.

- 2) What impact will the proposals have on the involvement of older people in planning?

Hopefully it will provide more opportunity for the older people to actively involve in the decision making processes and would then lead to happiness and more satisfied and comfortable time in their old age

- 3) To what extent will older people be able to realise their development priorities through Neighbourhood Plans?

It all depends on the local older people as how well they are aware and organised about these developments and changes .The local activists will have to play their role as well to empower and positively motivate older people in their communities.

There needs to be suitable infrastructure and transport.

- 4) How will neighbourhood planning relate to Borough-wide and London-wide levels of planning? What support is needed for local communities to understand and take into account the wider planning framework?

Neighbourhood planning will not succeed in isolation from the borough and same is for the boroughs to work in partnership with one another.

Education and awareness of all the facts and implications along with training of good presentation skills will go a long way for local communities to understand and to take into account the wider planning framework.

5) We are also very interested to hear about some more specific issues. For example:

What do you do in your area/group/organisation to get involved in the planning system?

There are no set processes set up at the moment. The Groups of older people do organise petitions and representation in a small way or lobby the cabinet member for the older people to bring the issue/issues to her/his attention

I attend council local area meetings - have small input but believe what they talk about is rubber stamping what they intend to do.

6) What do you see as the main problems for older people locally in engaging with the planning system currently?

They don't know much about it and are rarely included in committees that could possibly have an impact.

I would add that planning has to relieve the heavy pressure on central London by moving people further out.

Planning committees do not encourage participation.

7) What are the main obstacles and barriers for community-led plan making in your area?

Lack of confidence due to inadequate understanding of the processes involved .The communities are fragmented on political /faith/race/culture considerations.

8) What would you like to see changed in the way older people can influence planning policy and planning decisions in London?

Proper training, more awareness and lifelike opportunities need to be provided and when consulted *actively* listened to and given feedback.

9) Do you think the proposals for neighbourhood planning can achieve a positive change and lead to better involvement of older people in London? What else is needed?

The proposals only will not achieve a positive change. They are only the beginning of the process for the better involvement of older people .There must be will and determination at the local and central Government to bring these long overdue changes .Only the positive attitudes supported by financial resources are the positive way forward

10) Do you think an appeals system is essential?

Yes

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NBH028 Prof Michael Edwards [University College London]

5 September 2011

Dear Jenny Jones

Thank you for inviting me to advise the Committee on its forthcoming Review of "whether the new opportunities and procedures for community involvement in the planning system beyond simple consultation will be effective and what, if any, improvements need to be made."

This reply is **not** written on behalf of either of the groupings I am associated with and I trust that both those organisations will be invited to participate in the Review itself. They are the King's Cross Railway Lands Group (and Development Forum) and the Just Space Network which operates at all levels from localities up to the Greater London scale. My comments at this stage are based on 40 or more years of experience of being an academic planner trying to support and assist community groups in their representations and challenges, and to write about the process.

I want to make just 6 points at this stage:

1. I hope that everyone on your Committee, from all parties, will agree that some of the things we all enjoy most about London result substantially from community interventions:

- Covent Garden where community participation saved most of the fabric from becoming dual carriageways and office blocks, ensuring also that the residential population was doubled: one of London's greatest success stories
- Piccadilly Circus, a similar story on a smaller scale
- Tolmer's Square, a sustained, socially- and ethnically-mixed and much loved area which, without community action, would have been a mono-functional office plaza
- At a London-wide scale, the campaigns against the motorway box proposed in the GLDP of the 1970s triggered a re-think which helped London be the civilised place it is today, less damaged by the motor car than most great cities.

Citizens and their community groupings can materially influence London's development for the better, not just defend parochial self-interest.

2. It is right that formal decisions are taken by elected and accountable members of authorities and there need be no contradiction between the elements of direct and representative democracy which together have characterised our system since the 60s. The nurturing of an informed and active public through participation makes for a more discriminating and effective electorate. Furthermore, with voting turnouts in local elections typically low in the UK, more direct forms of democratic input to policy helps to widen support for the resulting policies and give them legitimacy.

3. The balance of power and influence in the planning process is seriously skewed in favour of land and property owners who can afford consultant fees and staff to monitor and play active roles in public inquiries and EiPs. It should be, but rarely is, a duty on public authorities to foster the participation of lower-income

and less expert sections of the community in the interests of a more equal society. The Just Space Network of groups in London, which was initially grant-aided by City Hall to promote wider and deeper participation, is a case in point and it is rightly proud of the fact that the 2010 EiP on the DRLP heard from about 50 community groups – many of whom would not have had the capacity or confidence to take part without this mutual support. The Panel was very appreciative of the balance of representations thus achieved.

4. Building an informed public takes time and needs sustained effort, perhaps even more in London where the interplay of scales is so crucial: the neighbourhood, the Borough, London as a whole. Effective planning and effective participation call for clear grasp of interactions (labour markets, shopping patterns, housing, access to services, air quality all operate at varied scales and with multiple jurisdictions which people have to understand to formulate effective plans and representations). The present proposals for 'neighbourhood plans' have so far been conceived just as episodes which begin and end but the Committee will know that the process of planning, implementation and review is a continuous one and active citizenship needs to be continuous too.

5. Finally participation costs money. Local and London-wide grassroots organisations need continuous revenue support for core activities even though the overwhelming majority of their work is done by volunteers. Without this support the only people able to be fully effective will be middle class and retired people. There is equally a need for money and support in kind for participants in Inquiries and EiPs: the GLA and Boroughs could do more by way of reimbursing travel and carers' costs, making printed documents available free (especially for those without IT) and perhaps offering loss-of-earnings payments as happens with jury service. These material supports have suffered severely from the public spending cutbacks of recent years.

6. Finally I should add that there is a role for universities here, both in helping to support the growth of an informed public and in partnership with local government and other bodies in conducting relevant research informed by the problems generated in public participation. I am sure that Universities in London will be glad to bring forward more detailed proposals.

My hope is that the Committee will have all these points in mind in framing its inquiry.

Yours sincerely,

Michael Edwards, Senior Lecturer in the Economics of Planning and Leverhulme Emeritus Fellow

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NBH029 Living Streets

London Assembly Planning and Housing Committee: Review of community involvement in planning in London
Response on behalf of Living Streets, September 2011

Living Streets is pleased to be able to contribute to this review. We are the national charity that stands up for pedestrians. With our supporters we work to create safe, attractive and enjoyable streets, where people want to walk. We work with professionals and politicians to make sure every community can enjoy vibrant streets and public spaces.

We started life in 1929 as the Pedestrians Association and have been the national voice for pedestrians throughout our history. In the early years, our campaigning led to the introduction of the driving test, pedestrian crossings and 30 mph speed limits. Since then our ambition has grown. Today we influence decision makers nationally and locally, run successful projects to encourage people to walk and provide specialist consultancy services to help reduce congestion and carbon emissions, improve public health, and make sure every community can enjoy vibrant streets and public spaces.

Both our campaigning and influencing and our work with local authorities and communities on the ground have consistently supported the close involvement of communities in shaping the streets and neighbourhoods that they know best, and we have followed the emergence of neighbourhood planning closely.

- 1. How will neighbourhood planning work in London? What new approaches are needed to reflect London's unique situation?**
- 4. How will neighbourhood planning relate to Borough-wide and London-wide levels of planning? What support is needed for local communities to understand and take into account the wider planning framework?**

In terms of the content of neighbourhood plans, London's retention of a regional planning tier need not necessarily make much difference; though there is no formal requirement for neighbourhood plans to be in accord with the London Plan, they must accord with the strategic priorities of local plans, which in turn must be guided by the London Plan. However, community awareness of the overarching planning structure will be important and the national Supporting Communities in Planning projects are unlikely to be able to meet this need fully, given their disparate objectives and levels of resourcing.

It is therefore crucial that London's unique situation and governance frameworks should be harnessed to provide additional support to communities in developing neighbourhood plans. Organisations such as Urban Design London provide invaluable advice to local authorities on design and the expansion of this to neighbourhoods would be highly desirable. London's richness of professional and community networks, such as the Just Space Network, will be useful in enabling communities to share experiences and best practice (which has been provided only patchily with the national vanguard authorities) and this should be supported actively by the Mayor.

A key challenge faced, particularly in a city such as London where boundaries between local authorities and districts are more fluid and there is an additional tier of government, is raising awareness of how planning can affect everyday, visible, street-level issues. Living Streets' recent report, [*Making the Case for Investment in the Walking Environment*](#), draws together key evidence from across disciplines to emphasise the importance of street design and management in encouraging active travel and delivering positive social, economic, health and environmental outcomes. Involving communities in community street audits to assess what they would want to improve about their streets and neighbourhoods can be an accessible and practical gateway to further involvement in local planning.

Importantly, the GLA will need to clarify how Transport for London controlled assets, such as the TLRN, will interact with neighbourhood plans.

- 2. What impact will the proposals have on local involvement in planning?**
- 3. To what extent will local people be able to realise their development priorities through Neighbourhood Plans?**
- 5. What do you see as the main problems for local communities in engaging with the planning system currently?**
- 6. What are the main obstacles and barriers for community-led plan making in London?**
- 7. What do you see as potential solutions to the problems and barriers identified? How could they be developed and implemented in London?**
- 8. Is there a need for new and innovative ways of providing advice and support to local communities and what could this look like? Who should (and can) be involved and how could support be funded?**

Neighbourhood planning has the potential to increase and broaden local involvement in planning; however, Living Streets has concerns about the current proposals:

- Neighbourhood forums could be unrepresentative and stagnant, as they are unelected and able to draw on specific interest groups for membership, provided the membership is technically open. Though elected, parish councils can often have similar difficulties with a lack of turnover of membership and a lack of representativeness.
- Where local authorities are obliged to engage extensively with communities when developing local plans, neighbourhood forums will have no such obligation.
- While the ability to draw geographical neighbourhood boundaries that suit the needs of a community is in many ways positive, it risks the exclusion of those less able to participate.
- Government amendments to allow business involvement in neighbourhood forums have not given sufficient clarity of where control would lie and how forums would operate democratically.
- There will be disparities between different communities in the extent of willingness to participate and financial, social and intellectual capital which will leave some communities more susceptible than others to vested interests and unwanted infrastructure.

Ensuring the accountability and openness of neighbourhood forums and plan areas, and supporting communities to participate in neighbourhood planning, will be essential to the success of neighbourhood planning in London and elsewhere.

These issues – the dominance or perceived dominance of vested interests or usual suspects in local planning, a lack of interest or capacity to engage and concerns about accountability – are key existing problems for local communities in engaging with planning. Another key problem is that the engagement with planning that does occur is largely reactive and in response to perceived local threats, such as inappropriate development, while many people are unaware of the opportunity to contribute to the development of policy or see it as very abstract. Turning reactive engagement into proactive engagement is a key challenge, and clarifying the ways in which neighbourhood plans can affect street-level issues will be crucial to this.

Living Streets' experience in campaigning on grassroots issues such as speed limits and pavement parking and in delivering projects and consultancy support has shown that engaging communities in the street-level issues that concern them is far more successful than engaging directly with technical issues. For example, there is considerable support for 20 mph as a default speed limit in London, but residents and campaigners are unlikely to link these concerns to the planning system. Living Streets' community street audits give communities the tools and confidence to assess and improve their streets and can act as a gateway to engagement with broader policy frameworks. Any London-specific support for relating everyday, street-level issues to their planning context would be very valuable.

Contributions from developers or applicants through Section 106, the new Community Infrastructure Levy planning application fees or the pre-application consultation process for major applications could be explored as sources of funding, though the importance of these should not be overstated and there may be challenges in making the argument for planning support to fall within their remit. The argument could usefully be made for a proportion of money from these sources, or from new sources of finance such as the New Homes Bonus and business rate retention, to be used to support neighbourhood planning. More generally, a greater level of freedom for local authorities in finding innovative ways to raise revenue would be most helpful in opening up opportunities to support communities in planning.

10. Do you think the proposals for neighbourhood planning can achieve a positive change and lead to better involvement of the public in London? What else is needed?

The need for capacity building, accountability measures and the use of street-level approaches to demonstrate the relevance of neighbourhood planning has been outlined above. However, other aspects of the current planning reforms are pertinent, particularly the National Planning Policy Framework and its presumption in favour of development, which could see the power of neighbourhood plans undermined. A strong stance from the GLA in favour of substantial resources for localist planning, and a national planning policy that unambiguously empowers communities to participate in meaningful planning decisions, is crucial.

11. What are the practical implications of neighbourhood planning for proposed development? For example regarding the level of engagement and consultation between developers or applicants, local planning authorities and local people.

The neighbourhood forum model, the potential involvement of businesses in helping to put forward neighbourhood plans, the emphasis placed by the planning reforms on pre-application consultation and the idea that neighbourhood plans will be able to permit more, but not less, development of strategic infrastructure and housing than is identified in the local plan are very likely to lead to an increase in direct engagement and negotiation between developers and communities or community representatives, where previously some of this activity would have been mediated through the local authority.

As a consequence, neighbourhood organisations will need to assimilate a far greater amount of information than was previously the case. The Mayor and the London Plan and associated guidance can play a key role in signposting communities to guidance and to standards, particularly on housing, transport accessibility and design, which developments in London should be meeting, for example Manual for Streets 1 and 2.

Tom Platt

London Coordinator
Living Streets
5 September 2011

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NBH030 Glass House

Response from The Glass-House Community Led Design Review of community involvement in planning in London

Planning and Housing Committee

5 September 2011

In the last few months, The Glass-House has been actively exploring many of these issues through:

□ Regular Glass-House programmes supporting communities on the ground and promoting discussion and debate

More information at <http://www.theglasshouse.org.uk/what-we-do/>

□ **Building Community Consortium** work (working in partnership with Locality, The Eden Project and communityplanning.net) to deliver the DCLG funded Supporting Communities and Neighbourhoods in Planning. Ongoing through March 2012

More information at <http://www.theglasshouse.org.uk/building-community-consortium/>

□ **What are the challenges facing local authorities in delivering and adjusting to the localism agenda?** a breakfast focus group meeting with London local authority planning and development leaders organised in partnership with Open City, London, 14 July

(More information on key themes discussed on request)

□ **Design in Planning – Community Engagement in Neighbourhood Planning** - a workshop for local authority planners delivered in partnership with Design Council CABE, 13 July, London

More information <http://www.designcouncil.org.uk/our-work/CABE/Localism-andplanning/Neighbourhood-planning1/Design-in-Planning-Workshops/Design-in-Planning-Workshop-2/>

□ **Community and Planning, The New Relationship** – a Planning in London conference in association with The Glass-House, 7 July, London

Programme at http://www.theglasshouse.org.uk/media/17/617-planning-inlondon_glass-house-conference-programme2.pdf

□ **Glass-House presence on/in**

- Academy of Urbanism – ongoing
- English Heritage Urban Panel – ongoing
- CABE (now Design Council CABE) Enabling Panel - ongoing
- RISC Land and Society Commission - Jan – May 2011 ..

This work with a range partners and for a broad spectrum of beneficiaries has allowed us to explore the issues from a number of perspectives. These are some of the key themes that have emerged again and again:

1. The need to demystify planning within communities and raise awareness of the opportunities emerging

The average person has little knowledge of or interest in the planning system and encounters it only through regulatory processes, often when opposing plans for development. There is a challenge to raise an awareness of what planning is, what effective spatial planning could do to transform places, and what role individuals and community groups might play in that process. We need to make planning relevant to people and help them unpick what the opportunities really are. We also need to recognise that people's interest and capacity for involvement will vary enormously

and we should therefore ensure that there is a spectrum of involvement opportunities.

In short, we need to:

- ☐ get people to talk about planning (or placemaking) and its impact
- ☐ give local people a sense of opportunity – help them feel they really can shape their area
- ☐ provide clear and accessible information about how local people can play (and have already played) an active and positive role in the planning process, whether it be in informing local policy/projects or leading projects themselves (eg guidance, case studies, peer mentoring etc)

2. The need to build capacity

This is true both for communities and within local authorities and the professions.

For communities, understanding the planning system and how to manoeuvre within it will require people/groups to have access to clear independent advice and support. Much of this could and should come from local authority planning officers, but these officers may need some support on engaging effectively with members of the community and playing more of an enabling role. There is also a question of the real capacity within local authority planning departments following recent staff cuts. At the event we did for LA planners with Design Council CABE, one of the clear messages that emerged from discussion was that many planning departments are now underresourced and would struggle to provide meaningful support for all of the neighbourhoods in their area of responsibility.

For communities taking on a leadership role in neighbourhood planning, the key elements of successful support are:

- ☐ clear and accessible information and advice on how what their project fits into the local context (both in terms of policy frameworks and the physical, social and economic context of place)
- ☐ access to independent specialist expertise, free of political or financial interests in the project
- ☐ early support in urban design, planning and development principles and practice to help groups plan and deliver their own process effectively
- ☐ support in building skills and confidence, enabling/empowering the groups to work effectively with partners, consultants and stakeholders to find their own solutions.

Where possible, this support to communities should be free or highly subsidised. However, this approach requires clear supervision (and associated resources) to ensure quality and accountability. There will undoubtedly be a number of private consultancies diving in to provide this support, but I suspect that the quality will vary enormously and that much of this will be inaccessible to community budgets. The RISC Land and Society Commission made a series of recommendations around building capacity, making it clear that it is not just technical expertise that is required. We would like to reiterate the point that there are a number of not-for-profit infrastructure organisations (at a national and local level) that provide complimentary support and could help broker and support injections of technical expertise into projects.

3. The significance of the role of local authorities in neighbourhood planning and

the challenges they currently face

There is no doubt that the leadership and enabling role of local authorities will be crucial to the success of neighbourhood planning. This does not mean they should be taking control of how neighbourhood plans develop, rather collaborating as a partner in placeshaping and enabling community involvement in neighbourhood planning through:

- ☐ Providing strategic oversight to how an area, and the many neighbourhoods within it, change and develop. To do this they will need to support collaboration across neighbourhood forums to deliver an holistic approach and maximise benefit to the area and to local people
- ☐ Providing access to and help in understanding the planning framework in which their neighbourhood plan will sit
- ☐ Providing access to information of the social and economic context of the neighbourhood
- ☐ Providing access to information around local infrastructure and contacts with the agencies that support/manage it
- ☐ Enabling the development of relationships with potential local partners/collaborators from the civil society, public and private sectors
- ☐ Ensuring that the neighbourhood forum is representative and is being inclusive, participatory and approachable.

This last point leads to the big question of the neighbourhood forum, and the role of the local authority in identifying, designating one particular group as representative of a neighbourhood (see next section). The selection of which group will hold that kind of representative power places a huge responsibility on local authorities. There is a real risk that local interests could compete with the needs of a larger area.

At a time when many LA planning departments are under-resourced, the availability (through web portals and other media) of publically accessible information about an area would certainly help take some of the strain off delivering the support outlined above.

Much of the enabling role is reliant on face-to-face support and deals with complex issues and relationships. This takes time and resources that many planning departments simply do not have. However, if different departments within the LA could pool resources and expertise to think holistically about placeshaping, there may be opportunities to create a better-rounded and resourced interface with and support mechanism for members of the community.

4. The challenge around building/identifying a truly representative neighbourhood forum

This principle is a good one, but the practice of how it will actually work on the ground is a concern. This is a particularly significant issue in London, where dense and diverse populations give rise to an incredibly broad spectrum of (often conflicting) interests. It is also significant that the social capital and mobility of one or more group within an area may far exceed other and lead to a kind of natural selection process, leaving less-resourced groups behind.

There is also the very real issue that many neighbourhoods cross more than one local

authority boundary and individuals operate within a number of communities, so community involvement in planning will need to take this into account.

The referendum immediately raises concerns regarding representation. While we all hope that the neighbourhood forums will be inclusive and representative of as much of the community as possible, the referendum is in its very nature exclusive. There has already been some discussion of whether local businesses should have a vote, as well as the exclusion of young people below voting age, but there are many others who populate/use an area who would be excluded under the current plans.

5. Neighbourhoods crossing administrative boundaries

Generally speaking, Localism brings with it the challenges of supporting a network of complimentary and well-resourced developments without the larger than local strategic body. London is better placed than most to deal with strategic oversight and leadership, but the layers of complexity within the London planning and development framework will bring new challenges for local authorities working with communities on neighbourhood plans.

What happens when a neighbourhood or area of interest does not fit neatly into the administrative boundaries of one ward or borough? The duty to cooperate should technically require local authorities to think collectively and collaboratively, but ultimately it will take creative and determined people and partnerships to tackle the differences between administrative and emotive boundaries for a neighbourhood.

6. Financing development

The biggest problem that we see is that developments rarely start from a locally driven and collective vision for change. Financial interests of developers (and particularly house builders) are often based on stepping in, developing and selling on and not on investing in a long-term relationship with the area. The short-term gains are often quite different from the long-term effects. If developments invested in the involvement of local people and partners during the visioning and brief development they would be likely to meet with greater success.

We know that a well-designed neighbourhood requires the presence of places (and associated activities) that are not appropriate for income generation and are thus difficult to get built or to maintain. These spaces are often neglected in the planning process. While section 106 and CIL may offer some provision for the capital development of some such spaces, they are often developed as cost-effective solutions for the short-term (sometimes identified as □quick wins□) and do not necessarily address how to support long-term impact and sustainability. It will be crucial to think holistically about place in the long term, creating strategies for the more lucrative activities to subsidise those that will always need additional support.

Community led initiatives have been successful in delivering organic growth in areas, but access to funds is often limited by their capacity to take on risk and the unwillingness of lenders to support projects at the scale at which they operate. This has been seen quite clearly in the challenges facing the community led housing sector, which is well referenced in the RICS Land & Society Commission report. The increasingly limited and targeted capital grant funding available will make access to loans to support community led initiatives even more crucial.

The ability of groups to effectively forge partnerships to support the development of any project will also be crucial. We have found that those projects that bring together partners from across sectors and interest groups stand a better chance of achieving long-term success. We should all be thinking about what we can do to support such collaboration and make the most of combining limited resources from a number of partners.

Sophia de Sousa
Chief Executive
The Glass-House Community Led Design

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NBH031 Hampstead Garden Suburb Trust

Alexandra Beer
Assistant Scrutiny Manager
London Planning and Housing Committee
City Hall
The Queen's Walk
London
SE1 2AA

5 September 2011

Dear Ms Beer

GLA Review of Community Involvement in Planning

Consultation Response of the Hampstead Garden Suburb Trust.
As an example of neighbourhood planning, Hampstead Garden Suburb could provide a model for other areas of London. Local planning policies that shape the development of the area are already produced with a great deal of resident input and changes to the appearance of the Suburb are controlled by

a Trust with its own powers under a Scheme of Management approved by the High Court.

Context.

Hampstead Garden Suburb is internationally recognised as one of the finest examples of early twentieth century domestic architecture and town planning. The Suburb was founded in 1906 to a masterplan prepared by Raymond Unwin and Barry Parker. Unwin was in charge of the project from 1907 to 1914 and his office produced designs for a great many houses and cottages. Edwin Lutyens was brought in as a consultant, responsible for the design of the formal centrepiece of Central Square, including St Jude's Church , the Free Church , the Institute and the surrounding houses in North and South Squares.

The development of the area continued , under the control of the original Hampstead Garden Suburb Trust, into the 1930's, and although the economic and social conditions changed over the development period, the Trust's involvement ensured that the principles of the founders were carried on in the planning and architecture of the whole. The area today reads as a complete planned environment and is managed as one. Great care is taken to ensure that no changes are permitted that would detract from the special character of the place or set a precedent for further incremental damage. ...

The Present Trust and the Powers used to Shape Development

The present Hampstead Garden Suburb Trust was established to maintain and preserve the present character and amenities of Hampstead Garden Suburb. The Trust was created principally to control alterations to properties once they became freehold under the Leasehold Reform Act 1967. The High Court approved a Scheme of Management for the Suburb under the Act. Since then the great majority of the houses and many of the flats on the

Suburb have enfranchised and fall within the Scheme.

The Trust also controls development through restrictive covenants in the original leases and freehold transfers. The purpose of these covenants is to enable the Trust to protect the Suburb from unwelcome development. Amongst other restrictions, the covenants prohibit the subdivision of properties into more than one residential unit.

The Trust also retains the freehold ownership of and manages 11 allotment sites, 27 unadopted roads and some 50 other communal open spaces. Through this ownership and the powers provided by the Scheme of Management itself, the Trust can maintain a unified control over nearly all Suburb properties and the trees, hedges and many of the communal areas around them.

The Trust Council is made up of 4 elected members who are residents of the Suburb and 4 appointed members who represent the RIBA, RTPI, Victorian Society and Law Society. This ensures an appropriate balance between specialist knowledge and local interest. All residents of the Suburb can become members of the Trust and elect Trustees.

Neighbourhood Planning in Action.

There are a number of reasons why the Trust is in a good position to promote appropriate and sustainable local planning in association with the Hampstead Garden Suburb Residents Association and the London Borough of Barnet. However, the Suburb is unusual in that there is little opportunity for development and therefore is no real need for a community led Neighbourhood Plan.

- Hampstead Garden Suburb already has a natural boundary which defines it as a neighbourhood.
- The systems for neighbourhood planning already exist in the Suburb and could be extended into a Neighbourhood Forum should this be considered necessary.
- The Trust has worked in close cooperation with the London Borough of Barnet and the HGS Residents Association to develop a suite of policies to shape development in the area.
- The community have been actively involved in developing planning policy. The Trust, the local authority and a group of over 70 residents researched and wrote a Conservation Area Character Appraisal for the area and prepared specific policies contained in a Conservation Area Management Proposals document. These policies were widely consulted and have been jointly adopted by the Trust and Barnet.
- Design Guidance for the area has also been adopted jointly by Barnet and Trust to advise residents on how changes can be made without damage to character of the area.
- Design Guidelines for the Public Realm have been jointly agreed

between Barnet and the Residents Association and supported by the Trust. This covers street design and traffic issues.

- The Suburb is planned and managed as a coherent whole, Barnet's operates its planning controls in a way that is generally compatible with the objectives of the Trust (although the Trust's powers enable it to control a wider range of alterations that could be detrimental to the character of the area and fall outside the local authority's powers). The Suburb is an unusual example where controls emanate from different legislation, but are used consistently and in cooperation between stakeholders.
- The housing density of the Suburb cannot be intensified because of restrictive covenants and the Scheme of Management. This limits the extent of change that is possible.
- Residents are articulate, informed and engaged. Hampstead Garden Suburb is a good example of localism at work and could be used to inspire other communities.

Threats

- As set out in the GLA's consultation paper, The Neighbourhood Plan can "define specific developments or types of development which will have automatic planning permission without the need for any application to the local authority." This would be unacceptable in an area where controls to the changes to the character of the area are tightly controlled (for good reason) and these controls have the support of residents.
- Any plan should coordinate national planning policy and guidance with the powers of the Trust.
- Presently there is little control over the work of statutory undertakers. This often has a detrimental impact on the character of properties and the public realm.
- Change to national or local authority policies may weaken conservation powers,
- Privatisation of the local authority planning service, At present we rely on a small number of motivated and knowledgeable planning and conservation officers that know the area well and understand the pressures for development.

I hope these notes are of value to the consultation exercise. The Trust would welcome the opportunity to comment on the next stage of the policy development.

This paper supplements a response submitted by the Hampstead Garden Suburb Residents Association. **(NBH019)**

Architectural Adviser

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NBH032 Legal and General Property

. **From:** Delaney, Nick
Sent: 05 September 2011 16:23
To: Alexandra Beer
Subject: Review of community involvement in planning in London

Dear Alex,

Review of community involvement in planning in London

I write on behalf of Legal & General Property (LGP) to provide a reply to your letter of 22nd July. LGP takes an active interest in planning policy in London as a major property investor and employer. LGP is one of the top five commercial property fund managers in the UK and has completed in excess of £500 million worth of property development within Central London over the past decade. We are a long term partner of all of the communities within which we develop including most recently, St. Giles, where we have invested significant time and capital resource in to local initiatives.

We await the draft Regulations from Government that will frame the Neighbourhood Plan system. In the meantime however, some initial comments and observations are made below (structured around the questions in your letter).

(Question 3) We understand that the intention is that Neighbourhood Plans should be in conformity with the NPPF and with local plans. The opportunity for local people to realise their development priorities therefore will lie either through their alignment/ endorsement of both, or through matters that lie outside of the strategic policies contained within these documents. We support the opportunity that this presents to promote growth to meet local needs and development standards where the NPPF and local plan policy is silent, however we have some concern that conversely, there may be circumstances where an additional tier of detailed policy might act to unnecessarily constrain. We are concerned that policy in the round should be sufficiently sensitive to ensure that it does not frustrate development particularly in the current economic climate; an issue that will require particular balance in the London context given the raft of policy that already exists.

(Question 4) In this context, we believe it imperative that Neighbourhood Plans should be commercially grounded; which will require that support be given to local communities not only on the wider planning framework but also on development needs and viability.

(Question 1) Further to the above and an issue specific to London (which does not have Parish Councils), a key consideration will be the make up of the qualifying body which drives Neighbourhood Planning. We view it essential that commercial interests, which are a key component of the local community, be sufficiently represented.

I trust that the above is self explanatory, however, if you have any questions please do not hesitate to contact me.

Yours sincerely,

Nick Delaney
Planning Manager
Legal & General Property

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NBH033 Clear Village

From: Thomas Ugo Ermacora

Sent: 05 September 2011 18:46

To: Alexandra Beer

Subject: REPLIES RE : COMMUNITY INVOLVEMENT IN PLANNING IN LONDON REVIEW

Dear Mrs Beer,

Please find below a few remarks and suggestions relative to your questions for the review I hope are still in time for your consideration.

I would like to say before my answers that although I am originally an urban planner/designer and have been involved with a number of consultations those where mostly in France and Denmark. I founded Clear-Village.Org as a design-driven community development charity to initiate and support project work which would enable residents to feel more truly engaged and empowered in shaping their living environments, particularly in places that don't usually find interest of big money or that are marginalized by some geographical, economic or other stigma. Therefore, my replies are more focused on what I have been working on to stimulate new planning approaches in the UK and elsewhere and may not be centered on the direct aspects of your questions but I hope they can give an additional angle or perspective to your important inquiry. In general I believe that some of these are novel but proven and common solutions that can significantly improve the longevity and smoothness of planning neighborhoods.

1. How will neighbourhood planning work in London? What new approaches are needed to reflect London's unique situation?

London is unique yes but is that the main question to answer I wonder. I think that whatever the place, it is the way you create an environment that fosters trust and care for opinions as well as a mechanism to harvest good intentions and ideas that is more important. Our focus at Clear-Village.Org has been to package best practice of co-creation techniques, create an expert network of local development (including sustainability, social enterprise, and more), and make these tools available to non designers in curated and immersive design charettes integrated in a customized change process that produce 3 outcomes to our knowledge : 1-proximity by sharing and team work, 2-a culture of collective visioning expressed in a narrative that is developed over the course of the design charette as well as interviews conducted prior, and finally 3-a strategy with key stakeholders to perform the transition with incremental steps and todos shared amongst participants.

2. What impact will the proposals have on local involvement in planning?

Our thinking is that once a form of partnership between local actors and residents exist as they have shared an experience they can relate to together, it grounds the projects and gives perspective by taking away the painful points of discord and focus on the points of agreement that can be taken forward in a concerted way. Consultation today even when using involvement techniques is not based on a experience enough. We need to open up people to get their commitment as well as expose them to the constraints and build of culture of reasonable possibilities that the neighborhoods can strive to achieve over a given period of time and where responsibilities and accountability can be expressed clearly. Our sense is that the improvements in conversation and effort quality are impressive and it is those new teams that will accept to do work without public funding or slight disengagement from local authorities because it will be based on empowerment rather than top down expectations. Also these design charettes that more than anything are their to brand a shared dream and tell a story to people's psyche, are a more elaborate way of

having bottom up projects and give them direction. We like to call this "bottom up +", and it comes down to the quality of the curation and facilitation.

3. To what extent will local people be able to realise their development priorities through Neighbourhood Plans?

The greatest unknown of all most probably but what I fear here is that we are loading the barrels with blank bullets. If the Neighborhood Plan doesn't pass referendum then there is a large likelihood it will disintegrate after, and the pressure that puts on the whole process also doesn't make locals want to invest their free time in it at times. To us, the key here is to make the Neighborhood Plan a good excuse to build proximity and generate projects or clear prospects for local improvements that can be realised whether the Plan is approved or not. In other words, communicating that the intention of Neighborhood Plan's is to get together the local resources and hopefully manifest them in a plan that can be executed with local stakeholder's support seems crucial to us. Furthermore, educating locals on best practice and having trained facilitators and process managers can be a strong way to prevent collapse or just to get started. Those professionals coming in will have an important role in defining the scope of realistic opportunities so that success can lead to realising local development priorities and aspirations.

4. How will neighbourhood planning relate to Borough- wide and London-wide levels of planning? What support is needed for local communities to understand and take into account the wider planning framework?

The correlation between the micro and macro scales or village/neighborhood to city/metropolis level is one that should take into account certain other priorities such as access, resource and waste systems. The rest really can stay quite local. If you give a chance to restore village life and depend less on the boroughs, we believe you can develop extraordinary positive externalities where the success of one local neighborhood plan can be contagious and spread through word of mouth, social media and other ways that don't rely on conventional governance structures. Obviously a harmony needs to be struck, but it should maybe rather set targets and limits for neighborhood plans that can be observed and evaluated and not more.

These are quick bird's eye view observations, but they reflect the fact that we see similar questions arise all over Europe now and London is special but not that different in its needs to get communities more empowered and engaged. We have a catalog of social innovation best practice we work with that is informed by a lot of European cases.

Thank you for getting us involved and we hope to contribute to the thoughts and actions which may follow.

Many kind regards

Thomas Ugo Ermacora
Strategy Director & Founder

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Date: 5 September 2011

Dear Jenny,

Review of Community Involvement in **Planning in London**

Thank you for your letter dated 19th July 2011 asking for the London Borough of Wandsworth to provide information for this review. You have asked the following **questions: -**

1. How will neighbourhood planning work in London? What new approaches are **needed to reflect London's unique situation?**
2. What impact will the proposals have on local involvement in planning?
3. To what extent will local people be able to realise their development priorities through Neighbourhood Plans?
4. How will neighbourhood planning relate to Borough-wide and London-wide levels of planning? What support is needed for local communities to understand and take into account the wider planning framework?
5. What do you see as the main problems for local communities in engaging with the planning system currently?
6. Do you think the proposals for neighbourhood planning can achieve a positive change and lead to better involvement of the public in London? What else is **needed?**
7. Is there a need for new and innovative ways of providing advice and support to local communities and what could these look like? Who should (and can) be involved and how could support be funded?.
8. What are the practical implications of neighbourhood planning for proposed development? For example regarding the level of engagement and consultation between developers or applicants, local planning authorities and local people.

It is not easy to respond directly to these questions or even necessarily give direct answers as in several areas local authorities such as Wandsworth are still questioning how the process might work themselves.

Possible residents' perspective

In general in this Borough, residents' main reasons for wanting to develop a neighbourhood plan are to further conservation ambitions or to prevent development. In Wandsworth the most organised groups are the amenity societies, who already engage very well with the Council, albeit not always agreeing with the Council's approach on **certain issues. These groups were primarily set up to protect local amenity and in the vast majority of recent cases have asked for less development and have certainly opposed both high density development and tall buildings.** To this end a number of the aspects of the neighbourhood planning system make this mechanism frustrating for those people. These would include the need to: -

- Identify a sensible geography

- Promote more development than the LPA is promoting

Possible problems for local communities might, but will not universally, include: -

- **Having a coherent structure, bank account, and minimum 5 year lifespan to the organisation**

- Agreeing a geography that makes sense both for them and the local authority (in general my view is that residents will define a smaller geography than the borough **may wish to see or one which excludes an area which then becomes difficult to link** to any future neighbourhood) or one not already adequately covered by locally relevant planning (conservation areas, town centres, opportunity areas) especially as different groups are likely to come forward with proposals for neighbourhoods at **different times in response to local issues.**

- Engaging with people within an agreed geography who do not share their views **(owner occupiers with estate residents, residents with businesses, young people, those with niche interests etc)**

- **Developing the plan without heavy call on council resources.**

- Agreeing to higher level of development than is already set out in the Core Strategy
- Understanding the ramifications of emerging planning policy changes in relation to their flexibility to plan locally and during their development /adoption changes e.g. NPPF, possible changes to the UCO etc after all this simple fact has hindered so **many local authorities developing policies!**

- Lack of clarity about the role of elected Councillors

- Generating the level of support required in any referendum to bring proposals forward.

Issues for the local authority

- The resource implication in Councils to support neighbourhoods, explain planning issues, agree geographies, pay for and support referendum, etc especially in times **of cuts**

- The fact that in general we consider that locally specific needs have been taken into account in our new and spatially focussed Core Strategy with further detail provided in relevant areas by Conservation Area assessments, VNEB opportunity area framework, Site Specific Allocations Document and its Area Action Strategies and overall with more detail in the Development Management Document - all of which have gone through wide ranging consultation

- Lack of clarity about the procedures for Neighbourhood Development Orders and Community Right to Build Orders

- **Wandsworth is an ambitious borough in terms of development and has set high growth targets - in fact, more often than not residents want less development or lower density schemes rather than more than we propose in current planning policy.**

I realise this is a very general response and it does reflect the corporate view of the Council as it has not been discussed with members but I hope these views are helpful to **your committee.**

Yours sincerely

Seem a **Manchanda**

Assistant Director (Planning Services)

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NBH035 Planning Aid for London

FAO: Alexandra Beer, Assistant Scrutiny Manager
London Assembly Planning and Housing Committee
City Hall
The Queen's Walk
London
SE1 2AA

Via e-mail Alexandra.beer@london.gov.uk

RE: Review of Community Involvement in Planning in London

Dear Alex:

This statement provides the views of Planning Aid for London (PAL) on community involvement in planning in London, both historically and as we see it developing under the neighbourhood planning provisions included in the Localism Bill.

Background

PAL has been providing town planning advice and support in the Greater London area since 1973. Our advice and support is designed to help individuals and groups to:

- Understand and interact with the planning system
- Take part in preparing policy plans
- Put together their own plans for their communities
- Make comments on planning applications
- Apply for planning permission
- Appeal against a refusal of permission
- Appear with confidence at planning committees and public inquiries

PAL works with communities all over London, delivering training, advice and consultation. PAL's funders currently include Department for Communities and Local Government (DCLG), London Councils, and a number of Local Authorities, Housing Associations and private sector businesses through project sponsorship. PAL is delivering Department for Communities and Local Government's Supporting Communities and Neighbourhoods in Planning programme in Greater London through a partnership agreement with Planning Aid England (PAE).

In general and as a matter of principle and practice, PAL has always favoured community involvement rather than consultation as a means of securing sustainable planning and development. In line with the general arguments set out in the Big Society, PAL believes that local communities should be involved not only in the planning and design but implementation, management, and wherever possible, delivery of appropriate elements of regeneration / new development (e.g. as Social Enterprises, Community Development Trusts, etc.). PAL applauds the mainstreaming of community planning into the statutory planning processes. PAL's responses to the Committee's questions follow.

Response to the Questions

1 HOW WILL NEIGHBOURHOOD PLANNING WORK IN LONDON? WHAT NEW APPROACHES ARE NEEDED TO REFLECT LONDON'S UNIQUE SITUATION?

London is unique in UK in a number of different ways. It:-

- Has very high land and rental values, sometimes juxtaposed against serious poverty.
- Is a global city with a highly diverse multicultural population.
- Has a population with a general distrust of Planners and Planning Committees/Authorities.
- Has a very rich heritage of voluntary / community action, community planning and independent technical aid in support of these activities.

In our opinion neighbourhood planning will be extremely popular in:-

- The suburban areas of London, including Outer London.
- Areas where development is imminent and / or there are real opportunities for development.
- Inner London areas and housing estates, where there is a long tradition of community based action and a solid, albeit under-resourced, network of community activists and activity.
- Other areas which are 'natural' neighbourhoods and where there is local disenchantment / distrust of the public sector to address pressing environmental issues and other local priorities.
- Situations where there are opportunities for temporary uses.

Most community based interest in planning is at a personal or local neighbourhood facilities level. It is demonstrably more difficult to explain involvement of communities in borough-level and certainly regional-level planning activities and to obtain evidence of the same. Based on PAL's experience with community involvement, bottom-up pressure to prepare Neighbourhood Plans could well be exerted by activists from community based organisations such as Tenants and Residents Associations, Area Forums, Amenity and Civic Societies, Environmental Groups, Community Development Trusts, Ethnic Minority and Cultural Associations upon Councillors, Borough wide Voluntary Sector organisations such as Voluntary Action Camden and Community and Voluntary Sector Organisations (CVSs), organisations such as Planning Aid for London, Friends of the Earth and networks of groups interested in town planning matters (i.e. Just Space Network), as well as directly onto the Local Planning Authority staff.

It is equally predictable that Neighbourhood Plans will more closely resemble/reflect issues contained in Sustainable Community Strategies than in LDF-related place shaping / environmental / land use issues (e.g. community safety, state of the public realm, transport options and opportunities, local shopping options, lack of affordable housing, young people - lack of training/jobs/opportunities, lack/loss of local facilities - post offices, health facilities, libraries, etc.).

An early Neighbourhood Planning initiative is the Camden Blueprint currently underway at Bloomsbury Village and facilitated by Camden Community Empowerment Network (<http://www.camdencen.org.uk/>) and the Bloomsbury Association (<http://www.casweb.org/bloomsburyassociation/>). This is a commendably pragmatic pilot designed to learn lessons through doing. By the end of a recent meeting of around 40 people the participants had already achieved a measure of consensus around both the boundary of the Neighbourhood and the component elements of the "shadow" Neighbourhood Plan Community Forum. It is hoped that by end of December an action plan led by the shadow Community Forum will have explored the need for co-option of members, the need for advisers and the processes for regular liaison with local authority staff, as well as have set up working groups around specific issues. Through a brief programme of selective outreach to engage hard to reach groups in the neighbourhood, and through use of techniques such as *Placecheck* and *Planning for Real*, it is hoped that a draft Neighbourhood Plan can be produced and that it will be straightforward to finalise it and submit it to the local authority once the Bill is enacted.

Recommendation 1

It may well be wise to accept that different approaches to planning are required at neighbourhood, borough and regional level. It is at neighbourhood level where access to independent technical aid will be paramount, and where distinctions between physical and other development plans and strategies to address specific issues (e.g. Crime and Disorder, Housing, Health, Education, Transport, Leisure and Recreation) will need to be brought together. Conversely, regional planning efforts will need to be made intrinsically strategic to reflect regional and national planning policy and priorities. These will require specialist input. It may well be that it is at Borough level where any conflict between neighbourhood level concerns and regional priorities can be resolved. The Boroughs should remain the primary area of interface between Councillors, officers, members of the Neighbourhood Community Forum, and the local electorate at large.

Recommendation 2

A culture change is required to ensure genuine community involvement and partnership working between Borough planning officers and other Council staff and their counterparts in neighbourhood groups and Community Forums to enable neighbourhood planning efforts. This should be accompanied by new processes and procedures based on readiness to trust and to share power and responsibility:-

- Regular items, or items as and when required, on Community Forum agendas for relevant officials in Planning, Community Safety, Housing, Health, Education and other departments to report.
- If necessary, a standing regular diary meeting date (say every 2 months) for exchange of information / feedback between officers and local community and their advisors.
- For development sites within the locally agreed Neighbourhood Plan boundary, partnership working between planning officers, representatives of Community Forum and independent advisors on:
 - preparation of and processing of Development Briefs and Applications
 - appointment of preferred Developer / Consortia
 - negotiation of planning gain / CIL, including employment and training of locally based young people
- Abandonment of silo mentality at the neighbourhood level
 - recognition of the inter connectedness of land use planning - housing - health - education - employment opportunities
 - creation of procedural pathways to link physical planning with other plans and strategies
- Employment of effective outreach techniques to involve local communities
- Exploit every opportunity to secure effective independent technical aid at neighbourhood level, including involvement of local schools, higher education institutions, arts and cultural projects and other organisations

Recommendation 3

Recognition of the centrality of the Voluntary and Community Sector (VCS) to the success of bottom – up Neighbourhood Planning efforts, particularly in inner London. Secure funding is required for the success of this recommendation and innovative initiatives could include awarding public consultation contracts to locally based and trusted VCS organisations rather than to private sector consultancies, awarding housing estate maintenance contracts to estate-based Tenants and Residents Associations or Community Development Trusts. New funding and delivery mechanisms can also be considered for community facilities, such as parks and gardens, community nurseries, libraries.

Recommendation 4

A percentage of planners continuing professional development (CPD) activities could be allocated specifically to work on neighbourhood planning and community planning efforts.

Recommendation 5

During the neighbourhood planning process, delivery of certain initiatives (e.g. community safety) may need to be coordinated across more than one neighbourhood. This provides an opportunity at borough and/or at regional level to monitor and evaluate neighbourhood planning activities, to identify examples of best practice and to map activities so that areas where additional support may be required can be identified and progress in existing areas can be tracked over time.

Recommendation 6

PAL would suggest that there needs to be a review of the role of Councillors at all levels with regards to Neighbourhood Planning.

2 WHAT IMPACT WILL THE PROPOSALS HAVE ON LOCAL INVOLVEMENT IN PLANNING ?

PAL thinks these proposals will excite local interest in the areas listed in response to Question 1, above. It is at the micro level (individual property, street, neighbourhood) that the impact of land use planning is generally understood and where there is the most desire to engage in shaping the future environment. It is at this level that, if given appropriate support, a local electorate with knowledge of the planning process and enhanced capacity to communicate their needs will be able to enter into direct dialogue with local Councillors and officers. This will allow residents and local business owners to participate in the planning process on more equal footing and to see the impact of their participation on the quality of their local environment.

3 TO WHAT EXTENT WILL LOCAL PEOPLE BE ABLE TO REALISE THEIR DEVELOPMENT PRIORITIES THROUGH NEIGHBOURHOOD PLANS?

The level of influence wielded by local people will depend in great measure upon the degree to which the culture changes briefly discussed under Recommendation 2 can be effected. The more genuine the involvement of local people and groups, the more effective the partnership with public and private sector partners and the more extensive the outreach and other consultation techniques employed, the more likely that development priorities will be revealed and determined politically, financially and legally viable (or not). There are many examples of regeneration and development projects in London that embody failures of the traditional top-down planning process (e.g. Battersea Power Station, Elephant and Castle, Kings Cross). Where top-down planning efforts have been successful from a spatial planning standpoint, they have been failures of social planning, resulting in the displacement of existing, usually disadvantaged, communities. The Docklands and Spitalfields are two examples. Successful working partnerships between local authorities, developers and local communities start small and rely on trust. They also require adequate support for local communities, as necessary, to build skills and the capacity to participate in the planning process. As that trust and capacity on all sides grows, so does the readiness to compromise and to take calculated risks. Given the current lull in the property market, the Neighbourhood Planning process may also provide opportunities to build on the success of existing temporary uses, particularly if the potential exists for some elements of these uses (e.g. green spaces) to become permanent.

4 HOW WILL NEIGHBOURHOOD PLANNING RELATE TO BOROUGH-WIDE AND LONDON-WIDE LEVELS OF PLANNING? WHAT SUPPORT IS NEEDED FOR LOCAL COMMUNITIES TO UNDERSTAND AND TAKE INTO ACCOUNT THE WIDER PLANNING FRAMEWORK?

Neighbourhood priorities often include issues covered by borough and regional plans. Arrangements need to be in place to discuss these issues as they arise in neighbourhood planning efforts. The boroughs and GLA could identify points of contact within their organisations. The boroughs and GLA should also be prepared to enable meetings, round-table discussions, and/or workshops between stakeholders or to direct local communities to other organisations during formulation of Neighbourhood Plans. In some cases, communities may need to get outside support to engage with their borough and the GLA during the neighbourhood planning process. Whoever takes on this role should have a town planning background and preferably allied expertise working in property development or community development. As the

Neighbourhood Plan moves into implementation and management, communities will need ongoing support and training, including financial support.

London communities, including Inner London and ethnic minority communities have proved themselves capable of engaging the realities of the planning and development processes when given support; particularly in situations where there were direct financial benefits or other opportunities to improve the local area. Some examples of community planning efforts (both successful and not) follow:-

- Isledon Road Community Plan. The genesis for this plan was PAL's assistance to the Finsbury Park Action Group in 1986–89. It is now almost entirely built.
- Spitalfields Community Plan. Arising from the offer by the developer to transfer land at Brick Lane (the combined Bishopsgate Goods Yard and Trumans Brewery) out of private ownership into a Community Development Trust, this Plan was created by the mainly Bangladeshi Community Development Group in 1989/90. It was created in partnership with the LET, Grand Met Architect, Hunt Thompson Planners and with the input of the Bethnal Green Planning officer and his staff. The plan included the extension of the East London Line, a new TfL station and major office development on Shoreditch High Street; however, it was not built due to the collapse of office market in the mid-1990s.
- Planning application submitted by Kings Cross Railway Lands Group 1990/91. Based on a community plan, the application included 2 million square feet of offices, thousands of new housing units (social and market), a re-routed Channel Tunnel Rail Link terminating at St. Pancras and new piazza at Kings Cross Station. Part of the proposal was never built due to the collapse of property market; however, the Channel Tunnel Rail Link was completed in 2007–9.
- Elephant and Castle 1998/2001. Local residents and activists, assisted by staff from South Bank Polytechnic, worked with LB Southwark to prepare a Development Brief for Heygate. They also interviewed and appraised proposals from the three consortia bidding to become the borough's preferred developer partner for the project. The Master Plan submitted by the developer appointed for the project – Southwark Land Regeneration (SLR) – called for delivery through a Local Regeneration Company and / or a Community Land Trust. A Community Development Group with its own staff, premises and independent advisors was set up and funded (through SRB) to progress a collaborative Master Plan and other partnership initiatives with the Borough Regeneration team and their consultant advisors, and SLR and their consultant advisors; however, this initiative failed.

5 WHAT DO YOU SEE AS THE MAIN PROBLEMS FOR LOCAL COMMUNITIES IN ENGAGING WITH THE PLANNING SYSTEM CURRENTLY?

PAL undertakes a survey, the London Access Survey, every few years. This is a 'secret shopper' exercise, where PAL volunteers or local planning students, are sent into local planning authority receptions to see how accessible the information at the desk is to the public, to note the cost of services and availability of staff to respond to enquiries. Problems for local residents and communities trying to engage with the planning system identified through these surveys and noted by the communities themselves are:

- Fairly rapid turnover of staff, often with limited knowledge of the local area and a lack of commitment to the neighbourhoods served.
- Local planning authority websites are often difficult to penetrate and not always keep up-to-date.
- Respondents commenting on planning applications are not informed of when the proposal is going to Committee or informed subsequently of the decision.

- Complexity of major development applications and supporting documentation.
- Lack of pre-application consultation or involvement.
- The number and complexity of Local Development Documents.
- Unclear roles for Ward Councillors who also sit on Planning Committees.
- Increasing reliance on private sector investment, particularly in Inner London boroughs, to secure quality development. This development often focuses on economic benefit to the borough, rather than benefitting the local community and responding to its needs.

- 6 IS THERE A NEED FOR NEW AND INNOVATIVE WAYS OF PROVIDING ADVICE AND SUPPORT TO LOCAL COMMUNITIES AND WHAT COULD THESE LOOK LIKE? WHO SHOULD (AND CAN) BE INVOLVED AND HOW COULD SUPPORT BE FUNDED?
- 7 WHAT ARE THE PRACTICAL IMPLICATIONS OF NEIGHBOURHOOD PLANNING FOR PROPOSED DEVELOPMENT? FOR EXAMPLE REGARDING THE LEVEL OF ENGAGEMENT AND CONSULTATION BETWEEN DEVELOPERS OR APPLICANTS, LOCAL PLANNING AUTHORITIES AND LOCAL PEOPLE?

Bottom-up planning will require the use of existing techniques (some of which were discussed above), but also new and innovative ways to engage, advise and support local communities. London is almost unique in that a number of community planning efforts have been undertaken; some successful, some not. The experience from these efforts, including Covent Garden, Coin Street and Westway, along with the work of the 50+ Community Development Trusts in London and efforts supported by the voluntary sector and academic institutions, will provide valuable lessons to the stakeholders involved in neighbourhood planning efforts.

The text above was prepared by a former PAL staffer (now a volunteer) who has been working on community planning efforts in London for over 35 years. Should you have any questions on a particular response or require further detail, please get in touch and I will ask him to respond.

Kind regards,

Allison H. Borden
Community Planning Team Leader

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5 September 2011

Dear Ms Beer

Re: Response to the review of community involvement in planning in London

Further to the letter from the GLA Planning and Housing Committee dated 19 July 2011 regarding community involvement in planning, the following response to the specific questions is provided below:

- **How will neighbourhood planning work in London? What new approaches are needed to reflect London's unique situation?**

Neighbourhood planning is likely to work in different ways in London. A 'one size fits all' approach will clearly not be the way forward; instead engagement (rather than consultation) will have to be applied in a sensitive and holistic manner depending on the community and issue. No one approach will be correct in every circumstance. Its success will depend on different factors such as community mix, level of transient population and willingness to cooperate, political representation at local level, level of communication between planning authorities and community and resource availability in terms of time and budget available to be spent on neighbourhood planning.

London is a special case as it contains many local authorities. There is a need for neighbouring authorities' cooperation. Also it is important that organisations like the GLA and London Councils are able to share their expertise and knowledge, both for capacity building within neighbourhoods and for adjoining local authorities to administer neighbourhood initiatives.

- **What impact will the proposals have on local involvement in planning?**

This is very difficult to gauge. There is clearly a resource issue that needs to be examined. Without providing adequate funding to engage properly which may require professional facilitators, there may be an unrealistic expectation that cannot be realised and local involvement in planning may deteriorate, rather than improve, especially in the poorest and most disadvantaged areas. The Government's Impact Assessment on the Localism Bill estimates that the average cost of neighbourhood plans as between £17,000 and £63,000 but also states that Councils in some areas could end up paying £200,000 to develop their plans. The cost to community groups of bringing forward a Community Right to Build scheme is estimated at approximately £40,000. Under cl.100 of the Localism Bill the Secretary of State may provide financial assistance or make arrangements for financial assistance for neighbourhood development orders and neighbourhood development plans. However, the fund is worth less than the previous direct government grant to Planning Aid. This means that resources to help local communities engage with planning will be scarcer than ever and there is a danger that the poorest and most disadvantaged communities lose out.

- **To what extent will local people be able to realise their development priorities through Neighbourhood Plans?**

This could depend on two things: the leadership shown by the local authority to give a fair opportunity for everyone to express their views including the use of independent facilitators, and also on the weight given to the Plans. If there is already a Core Strategy in place it is likely that the Plan will be in line with the existing policies whereas if there is no Core Strategy, the policies would not be so constrained. It is also important to note that Neighbourhood Plans will have a presumption in favour of sustainable development and there is a strong expectation amongst local people that plans should be able to restrict development in some manner (e.g the issue of subterranean development in the Royal Borough). It is anticipated that many local people will not realise their development priorities as they would prefer a more balanced approach to development – restricting it where it really matters whilst allowing it where it assists with regeneration.

- **How will neighbourhood planning relate to Borough-wide and London-wide levels of planning? What support is needed for local communities to understand and take into account the wider planning framework?**

Neighbourhood planning clearly sits more easily at Borough level and the role for a strategic authority such as the GLA is unclear. The GLA could play a useful supporting role in discussing experiences and best practice, although the Planning Advisory Service, London Councils and the Association of London Borough Planning Officers already provide this kind of support. Early indications suggest that neighbourhood planning works best when it is site specific, or involves a very small area. It does not work well at a strategic level and the two do not gel together. As such London wide levels of planning are likely to remain unaffected. Borough wide levels of planning will hopefully be enriched by the neighbourhood planning initiative. Local authorities can play a useful role in explaining to communities how neighbourhood planning fits into the wider planning framework - specialist independent facilitators may be required for the engagement process.

What do you see as the main problems for local communities in engaging with the planning system currently?

Local communities do not understand how the planning system operates - they find it difficult to understand what is material in planning terms and the weight that can be attached to material considerations. Most members of a community have limited time and resources to devote to planning for their area and do not engage except where a planning application might directly affect them. As a result the engagement that does exist tends to be a reactive and short term. Hard to reach groups, such as those from ethnic minorities and young people are particularly difficult to engage in the process. More emphasis needs to be placed on everyone having a voice and not just those who have the time and the knowledge of the planning system - their views may be articulate and robust, but they may not necessarily represent the wider community.

Do you think the proposals for neighbourhood planning can achieve a positive change and lead to better involvement of the public in London? What else is needed? Is there a need for new and innovative ways of providing advice and

support to local communities and what could these look like? Who should (and can) be involved and how could support be funded?

If properly resourced the proposals have the potential to achieve a positive change and lead to better public involvement. However, there is a danger that expectations will be raised, only to be frustrated at a later stage. More resources are needed both in terms of money and specialist support. Independent professional facilitators are required to ensure that the community can drive forward their ideas and they are realistic. There needs to be a clear mandate and a shared vision so that it is clear to all where a plan is heading. It is envisaged that the local authority would have the role of administering the system, agreeing sensible boundaries and explaining how neighbourhood planning fits in to the wider planning system. However, in terms of driving the plan forward, whether as a plan, or development order, professional independent facilitators would have the principal role. It is possible that local ward Councillors may wish to be involved, but their specific mandate is unclear, and it may vary depending on the project. Funding is clearly problematic – it is likely to be a combination of some public money combined with private money from the area, possibly from sponsorship from local businesses in the area, although this could prove controversial and would have to be handled sensitively.

What are the practical implications of neighbourhood planning for proposed development? For example, regarding the level of engagement and consultation between developers or applicants, local planning authorities and local people.

The Government's proposals to ensure that developers engage with local people prior to the submission of a major planning application are welcome. However, meaningful engagement will need to go beyond this initiative. Interestingly, the word, 'participation' does not appear once in the Draft National Planning Policy Framework and there is a danger that it could become a 'tick box' exercise unless comments are adequately addressed. Neighbourhood plans which are proactive, rather than reactive to development would be a welcome step forward in this regard and if used sensibly should help to provide certainty for developers. However, front loading the process will inevitably require more resources, from all parties, both in terms of time and money and equipping officers with the relevant skills to get the best from the community.

I trust that this will assist the Committee in their deliberations. If you have any further queries, please contact my Officer, Mr Wade.

Yours sincerely,

Jonathan Bore
Executive Director, Planning and Borough Development

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NBH037 Enfield Society

[Handwritten Letter dated .31/08/11 from Chairman of Architecture and Design Group]

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NBH038 Transport for London [TfL]

22/09/2011

Dear Jenny,

I write following receipt of your letter headed '**Review of community involvement in planning in London**' dated 20th July 2011. TfL would like to thank you for your consultation on this matter.

My colleagues and I have had several in depth discussions regarding the above topic and believe that no definitive conclusion can be made. However, several issues did become apparent and are summarised below.

- TfL continues to support the concept of engaging with communities. However, further information will be required to define what a neighbourhood plan is, who would be involved and how it would be funded and delivered in order for TfL to make a more comprehensive assessment.
- Local transport improvements such as cycle parking facilities, bus service capacity issues, public realm and access improvements would broadly be supported by TfL. However, it could be difficult for strategically important transport objectives such as Crossrail or similar schemes to be defined, funded and delivered through a neighbourhood plan and further guidance will be required on this aspect of localism.
- Therefore TfL recommends that guidance is produced to define transport issues as local or strategic in order to help neighbourhoods formulate realistic and deliverable plans.

Please do not hesitate if you wish to discuss any issues raised further.

Yours sincerely,

Hannah Readman
Assistant Planner

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Date: *3rd* October 2011

Dear Ms Beer

Review of community involvement in planning in London

Thank you for providing the City Council with an opportunity to comment on the London Assembly Planning and Housing Committee's review of community involvement in planning. Comments on the review are set out below, addressing the questions posed in the consultation.

1. How will neighbourhood planning work in London? What new approaches are needed to reflect London's unique situation?

The degree to which neighbourhood planning works in London will to some extent depend upon the local mechanism for its implementation. The Localism Bill refers to Neighbourhood Forums as the key vehicle for local involvement in planning. However, it may not necessarily fall to a Neighbourhood Forum to deliver neighbourhood planning, but to a parish (or urban) council which would have a far wider range of powers and tax raising capabilities. This form of governance has no voting rights or representation for business.

Within parts of London, there will not always be clearly delineated urban neighbourhood areas, unlike distinct villages surrounding by countryside in rural areas. Neighbourhoods may overlap, there may be 'gaps', or they may cross borough boundaries. There may also be more than one group purporting to represent the area, or in fact no groups at all. Neighbourhood planning will therefore need to have a degree of flexibility in its implementation to reflect London's unique situation.

Traditionally local residents groups have been the main focus for neighbourhood representation in London. Their biggest challenge will be the need to work with..

businesses as well to meet the requirements set out in the Localism Bill. Reconciling the localised needs of groups with the strategic and commercial needs for London as a whole will be a particular challenge for London Authorities.

2. What impact will the proposals have on local involvement in planning?

There is already long established local involvement in the planning process. The proposals try to integrate the needs of businesses with residents in the new neighbourhood forums. However the aspirations that businesses have do not necessarily marry up with its residents. The potential for conflict is immense with residents traditionally reluctant to agree to change but businesses keen to expand. The established residential neighbourhood community areas do not necessarily match the geographical areas run by local businesses, especially the retail sector which is more linear in nature and likely to cover several

established neighbourhoods.

Those areas designated as Business Neighbourhood Forums will give businesses a separate vote and possibly veto the wishes of local residents. Proposals for neighbourhood forums do not appear to address involvement of those traditionally 'hard to reach' sections of the community.

3. To what extent will local people be able to realise their development priorities through Neighbourhood Plans?

Local expectations are high but the reality will be very different. Residents will see this as an opportunity to restrict development or have no development at all. In light of the need for Neighbourhood Plans to be both positive and in conformity with strategic planning policies, there is little scope for neighbour plans to truly reflect the real wishes of local residents. A major challenge for local authorities will be how to manage resident and businesses expectations. There are two scenarios where it is envisaged local groups will come forward : Firstly where they are dissatisfied with topic-specific policies and planning application decisions, and secondly where they consider the local area has unique characteristics such as an "urban village" or "creative cluster". However, in both cases it will beg the question as to why their concerns have not been met through engagement with the development of Local Plans. Again, there may be good reasons as to why these local issues have not been met, or why perceived local characteristics have not already been recognised and provided for.

4. How will neighbourhood planning relate to Borough-wide and Londonwide levels of planning? What support is needed for local communities to understand and take into account the wider planning framework?

Communities will require a lot of support to take into account the wider planning framework. Local community priorities may not align with strategic London-wide priorities. There is the potential for a significant amount of abortive work where local groups set up a neighbourhood forum to achieve a specific purpose which cannot be delivered within legal and other policy guidance and documents. Again expectation management at early stages will be crucial.

5. What do you see as the main problems for local communities in engaging with the planning system currently?

One of the main problems for local communities in engaging with the current planning system is lack of resources to properly engage with the community. The question of resources and funding for neighbourhood planning is fundamental.

A second problem is the lack of interest from many parts of the community to get involved in planning. Consultation normally occurs through developers prior to applications being submitted or through local authority consultations associated with planning applications. Westminster currently sends out about 200,000 consultation letters a year but the response rate is extremely low (probably less than 5%).

For neighbourhood planning to work properly there needs to be a big shift to

ensure proper community engagement. An exemplar example of this is Chelsea Barracks, where 'Soundings' were employed as independent facilitators who have created a new benchmark for creative community engagement and where the final project has a very high level of ownership and support. This exercise cost £1 million and works on a blank canvas 13 acre site. Whilst this approach could not easily be applied to most applications, there may be some important lessons to be learned from the exercise. In terms of Neighbourhood Development Orders and Community Right to Build Orders, without any onus in the legislation for the owners to actually deliver, this again may result in work which fails to deliver the development sought. In developing local plans, most boroughs already go to considerable lengths to engage with local residents and businesses. However, most people do not have the time or inclination to become involved, and those who are involved do not represent everyone in the broader community. This is unlikely to be any different under the new provisions. Importantly, hard to reach groups are more likely to be excluded as neighbourhood forums and parish councils do not have any requirement to engage with them. Hard to reach groups are less likely to be on the electoral register and therefore will not be involved in local referendums.

6. Do you think the proposals for neighbourhood planning can achieve a positive change and lead to better involvement of the public in London? What else is needed?

Neighbourhood planning is unlikely to lead to a positive change in London because of the need for plans to comply with strategic policies and Government's presumption in favour of sustainable development. There is a risk communities will become disenfranchised and become less involved than they are now.

Neighbourhood planning in London needs to engage with as wide a cross - section of local communities as possible, including visitors and businesses as well as residents. There is currently a wide network of existing structures and mechanisms already in place, for example, amenity societies, Business Improvement Districts and Area Forums. The challenge will be to bring these interests together.

7. Is there a need for new and innovative ways of providing advice and support to local communities and what could these look like? Who should (and can) be involved and how could support be funded?

It is likely that specific officer resources will need to be allocated for the use of each neighbourhood forum who express an interest in Neighbourhood Plans or Neighbourhood Development Orders/Community Right to Build Orders. The GLA should also look at resourcing to assist community groups' understanding of and general conformity with the London Plan. The form (and therefore cost) of consultation will probably be determined by individual neighbourhood forums.

A greater need for innovation may be needed before neighbourhood groups are established. Pro-active boroughs may establish boundaries and consider any

other conditions that they may want to place on the formation of neighbourhood groups to avoid difficulties and overlaps/gaps once any applications come in. This could be done as part of a broader Community Governance Review. The Localism Bill and National Planning Policy Framework appear to make provision for local communities to retain monies associated with new development. It also appears to make provision for recovery of costs relating to neighbourhood planning. Additionally, any urban (parish) councils that are established have the right to set local taxes. Therefore there may be some scope for neighbourhood forums to procure and pay for the neighbourhood planning services involved. However, this is not clear and we would welcome any ideas you may have on this.

8. What are the practical implications of neighbourhood planning for proposed development? For example regarding the level of engagement and consultation between developers or applicants, local planning authorities and local people.

It is unlikely neighbourhood planning will provide a single, clearly recognised local community group for developers or applicants to engage with. However the neighbourhood forum will provide an opportunity for early engagement and discussion of proposed development and an opportunity to respond to and alleviate any concerns. There is also the potential for neighbourhood planning to introduce greater uncertainty and delay whilst plans are being formulated.

Other Comments

Whilst the Localism Bill does contain provisions for some cost recovery, there will clearly be a significant impact on local authority resources and their ability to effectively support and facilitate neighbourhood planning. It may be the case that there are resources to only support only a finite number of neighbourhood forums within a given borough. Local authorities would have to consider the difficult issue of which neighbourhood forums and which areas to support.

Yours sincerely,

Rosemarie MacQueen
Strategic Director Built Environment

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NBH040 Planning Officers Society

From: Kiely, Mike

Sent: 03 October 2011 12:26

To: Alexandra Beer

Subject: RE: Call for evidence reminder - London Assembly Review of Community Involvement in Planning

This consultation response is on behalf of the London branch of the Planning Officers' Society. We represent chief planning officers across London responsible for delivering spatial planning, development management and all other aspects of the planning system in the capital. We also have a vibrant network of spatial planning and development management specialists known as the Association of London Borough Planning Officers representing the heads of service in those areas.

The system of neighbourhood planning being introduced in the Localism Bill could involve some radical changes to the way planning is carried out in the capital. The government has invited local authorities to take part in 'front runner' projects in advance of the legislation becoming law and two London boroughs are in the 'first wave' of this programme, Sutton and Southwark, with other London boroughs considering applications to take part in subsequent phases. Some lessons can be learned from the experience of these front runners but in general it is too early to draw any firm conclusions.

The obvious observation to make about the application of neighbourhood planning in London is that in the rest of the country regional spatial strategies and the housing targets they contain are being abolished. London will be the only part of England with a regional spatial strategy. It appears also that the government's ideas for neighbourhood planning have been developed with more settled rural areas or small towns in mind. There are distinct challenges for London boroughs when trying to apply these principles. Many parts of London, particularly central and inner London experience:

- fragmented communities interspersed with major commercial areas
- communities living alongside and interspersed with areas with functions of national and international significance and alongside regional and national infrastructure
- wide variations in income levels and other socio-economic characteristics
- high population turnover

Reconciling the needs of the local community with strategic and commercial needs is a particularly important challenge for local authorities in London and is an important reason why London retains a strong regional strategic authority.

Another aspect of neighbourhood planning which may present particular difficulties for London boroughs along with other larger urban areas is the question of setting boundaries. While small towns and villages may have obvious boundaries that communities relate to, communities in London rarely do to the extent that the boundaries between boroughs have little meaning to people on the ground in many parts of London. There may be more instances of neighbourhood forums coming forward with ideas for preparing plans that cross borough boundaries than in other parts of the country which will require negotiations between boroughs and the GLA before the group can be recognised. The government has also announced 'business neighbourhoods'

where a business organisation can initiate and take the lead in the preparation of a neighbourhood plan and this will have implications in many areas of London and will be particularly sensitive in areas with national and international functions such as the City, the West End and Canary Wharf.

Regeneration in many parts of London is intense and rapid. The London Plan has an important role in identifying opportunity areas and areas for intensification and providing a strategic framework for these. These usually involve coordinating large scale development with investment in strategic infrastructure. There is a challenge in maintaining meaningful community involvement in the planning of such major change. London boroughs have responded to this challenge by investing a great deal in capacity building to assist community involvement and, as a result, across London there are many sophisticated networks of community groups involved in the planning process. Boroughs have developed innovative processes for promoting involvement in their plans. The commitment to meaningful involvement of communities in the planning of their areas is reflected in the boroughs' Statements of Community Involvement (SCI).

Community activism is more intense in London than elsewhere for many reasons: because of the pace of growth, the proliferation of heritage assets, the pressure on infrastructure, the acute housing needs and other social issues. The neighbourhood planning process being proposed appears to be a very simplistic response in that it suggests that communities will naturally come together with one voice and agree a plan. However, London boroughs are very well used to mediating between many different interests in the planning of their areas and in complex conflict resolution.

This response addresses the first four general questions to be discussed in this review. Questions 5 – 9 appear to be mainly aimed at the community groups themselves. POS London's comments on questions 1 – 4 are as follows:

1. How will neighbourhood planning work in London? What new approaches are needed to reflect London's unique situation?

The Draft National Planning Policy Framework says that neighbourhood plans should be used to 'plan positively to support local development, with the power to promote more development than is set out in the local plan'. It would appear from this that it is not expected that neighbourhood planning would be appropriate for all areas at all times but it is for communities who support growth and want to explore ways in which their neighbourhoods can benefit from further growth. It has potential to provide those communities with some power to decide where growth will take place and what form it will take. This is presented as an additional tool to supplement the existing tools of the local planning authority that also has the ability to provide an additional level of fine detail that would not be appropriate for the local plan.

It is also presented as a 'bottom up' alternative to the regional spatial strategies covering most of England which are being abolished along with their regionally devised housing targets. In London we still have the London Plan which has been recently updated with new, revised housing targets.

London boroughs are responding to these housing targets with local development frameworks that encourage building new housing wherever possible and they aim to achieve virtually all of this growth on brownfield sites. Many communities outside London have the difficult challenge

of deciding whether and where to release greenfield land for development but neighbourhood planning in London will not usually have to face this particular dilemma. In most parts of London virtually every possible opportunity for housing development on brownfield sites has already been considered and will come forward at some stage.

The Strategic Housing Land Availability Assessment which provides evidence for the London Plan and is behind the housing targets goes beyond identifying vacant, prime, brownfield land which is ready for development. It takes into account sites that could provide new housing well into the future. Some of the sites considered are in use for other purposes and may remain so for some time. So neighbourhood planning in London will not be a simple question of whether to 'choose growth'. This choice has already been made. Instead, through neighbourhood plans, communities could get involved in finding sites and opportunities for new housing development that might not otherwise have been recognised or where it was not expected to become available for development for some time to come. As with neighbourhood plans in other areas, one incentive to embrace growth in this way could be the New Homes Bonus.

A creative approach to finding sites for new homes in and around housing estates, in town centres, and in other areas where land and buildings have been left undeveloped for some years could be a feature of neighbourhood planning in London and might have the potential to provide sites for a great many new homes if the neighbourhood is behind it and decides to choose growth.

The role of the Mayor and the GLA in neighbourhood planning needs to be recognised. As neighbourhood plans need to be in general conformity with the strategic policies of the planning authority, this also needs to take account of the London Plan.

2. What impact will the proposals have on local involvement in planning

The biggest movements of local people getting involved in planning happen as a reaction to development proposals that they see as a threat to their neighbourhood. The idea of people coming together to actively promote development in their neighbourhood is quite unusual and it is doubtful whether this would take off in many areas. Many communities in London are, however, well used to a fast pace of change and may be more likely to appreciate the benefits of development such as investment in local facilities and the public realm than communities elsewhere in the country.

Well-run neighbourhood forums may be able to maintain the involvement of a large number of local people in the planning process – in some circumstances possibly more than could be achieved through conventional public consultation by the local authority. There is, however, the danger of raising expectations about the extent to which individuals and small groups can change the direction of growth and development. There is a view of neighbourhood planning that it will allow the plan making role and the development control decision making role to be removed from the local authority entirely. The Localism Bill as it is currently drafted does not make provision for this but there is still some ambiguity about how the current local development framework system will coexist with the neighbourhood planning system in the future.

3. To what extent will local people be able to realise their development priorities through neighbourhood plans?

As noted above, it is possible that many people will be drawn into the process believing that it will allow them to stop or significantly slow down the pace of development in neighbourhoods where there is a lot of development pressure. The government has stated that this is not the intention behind the system so in this sense, development priorities such as these will not be realised.

Experience so far has not exposed all of the issues surrounding the way in which neighbourhood forums will work with developers and land owners as local authorities do to ensure that plans are deliverable. If neighbourhood forums seek to prepare neighbourhood plans without involving developers and land owners there is a strong possibility that they would produce plans that are unimplementable wish lists. Facilitating discussions between neighbourhood forums and developers may turn out to be one of the main areas of support that local authorities will be called upon to provide.

As noted above, an important potential use of neighbourhood plans could be to bring forward development on sites which had not been recognised as potential development sites – at least in the short term. These could include sites which are seen as a problem for the area such as derelict sites and buildings that have been dilapidated and deteriorating for some time. If these sites became the focus of a neighbourhood plan, consideration would need to be given to using compulsory purchase powers to achieve the community's development priorities.

4. How will neighbourhood planning relate to borough-wide and London-wide levels of planning? What support is needed for local communities to understand and take into account the wider planning framework?

Neighbourhood planning has been described as an additional tool providing a level of detail not covered by area action plans and opportunity area planning frameworks.

Neighbourhood forums may set out to produce complex, multi-faceted plans that would completely take the place of the SPD/OAPF. Boroughs should discourage this approach and encourage neighbourhood plans that add an additional level of detail to the local development framework.

Neighbourhood plans will be required to be in conformity with the strategic policies of the planning authority. In London this will mean the Mayor's policies as well as the borough's. It will be a function of the examination process prior to a referendum to assess whether a neighbourhood plan is in conformity with the strategic policies suggesting that, at this stage, the plan could be rejected. If this were to happen it would represent a great deal of wasted effort. It is, therefore, essential that there is agreement around the beginning of the process as to what the parameters are within which the neighbourhood plan should be produced. This should include minimum levels of delivery of new homes and jobs in line with the London Plan and the borough's local development framework. It would be useful if, at an early stage, there was an agreed project plan setting out the measures by which the success of the neighbourhood plan should be assessed. This could include the level of community involvement that should be achieved. This would probably help avoid the situation where a referendum on a neighbourhood plan was lost.

The Localism Bill proposes a situation where neighbourhood forums can come forward at any time and in any area to request recognition as the qualifying body and support in producing a neighbourhood plan. As referred to above, neighbourhood plans may not be appropriate in all areas and at all times so there will be occasions when the local authority may consider it

inappropriate. This may occur when the local authority, in partnership with the Mayor, Transport for London, other public authorities and land owners/developers are considering strategic plans for a major redevelopment or regeneration programme in an opportunity area. It would not be possible to start considering the finer details of a plan when the broader strategic decisions have not yet been made. There needs to be a clear understanding of how and when neighbourhood planning may be initiated and when it should not be.

Mike Kiely
Director of Planning & Building Control

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From: Kiely, Mike
Sent: 04 October 2011 16:41
To: Alexandra Beer
Subject: RE: Call for evidence reminder - London Assembly Review of Community Involvement in Planning

Alex

One late comment to add to the end of our piece:

The Localism Bill establishes a very bureaucratic mechanism, which requires support from the LPA in practical and financial terms - the LPA is responsible for funding the neighbourhood plan examination, for example. In considering the potential to deliver community involvement through neighbourhood planning, some account has to be taken of the capacity of the LPA to both support and finance it, and the potential implications if a community wishes to progress a neighbourhood plan, but the LPA cannot resource it effectively.

Thanks

Mike Kiely
Director of Planning & Building Control

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NBH041 London Borough of Southwark

. 3 October 2011

Dear Ms Jones

Review of community involvement in planning in London

Thank you for your letter of 25 July 2011. My detailed comments on the review are attached to this letter.

As you know, Southwark Council is taking part in the DCLG's neighbourhood planning front runner project and we have two groups working on neighbourhood plans, one in the Bermondsey area (more specifically the west Bermondsey area around Bermondsey Street) and one in Bankside. We decided to take part in this project as we were concerned that the government's ideas for neighbourhood planning appeared to have been developed with more settled rural areas or small towns in mind. We felt that putting the concepts to the test in central London, in one of the London Plan opportunity areas, would allow us to explore how they might work at this extreme end of the rural/urban spectrum. The decision to apply to be part of this pilot was taken in consultation with GLA officers.

The groups we are working with started work on neighbourhood plans at the beginning of the year before the confirmation of the frontrunner projects by the DCLG in March 2011. At the time it was hoped that a neighbourhood plan would be produced by the end of the year. In practice, progress on the production of a neighbourhood plan has been slower than expected and it is unlikely that a finalised plan will be produced by then. However, a lot of valuable experience has been gained in both projects which I hope can help shape people's understanding of the issues and opportunities that will arise from these provisions of the Localism Bill..

The comments below refer to the first four questions set out in your letter. I understood that questions 5-9 were mainly aimed at the community groups who were taking part in these discussions so I have left these.
I would be very happy to provide further comments or take part in further discussions on this subject.

Yours sincerely

Simon Bevan
Interim Head of Planning and Transport

Review of community involvement in planning in London - Response to the London Assembly on Neighbourhood Planning from the London Borough of Southwark

Introduction

It is very important that the implications for London of neighbourhood planning as set out in the Localism Bill are properly investigated and understood. Many observers have commented on the way in which the proposals for the neighbourhood planning system appear to have been drawn up with more settled, stable communities in rural areas or small town locations in mind. It is notable that the majority of pilot projects in the current 'front runner' programme come from such areas. However, the Localism Bill will not be allowing for distinctions in the system for planning major urban areas and this is one of the reasons Southwark Council put its name forward to take part in the project. The implications of applying this system to dense urban areas such as central London need to be properly investigated and understood. London is, of course, the only part of England that retains a strategic regional authority with a spatial development strategy which includes housing targets.

Regeneration in many parts of London is intense and rapid. The London Plan has an important role in identifying opportunity areas and areas for intensification and providing a strategic framework for these. As with the Elephant and Castle (opportunity area) and Canada Water (area for intensification) in Southwark, these usually involve coordinating large scale development with investment in strategic infrastructure. There is a challenge in maintaining meaningful community involvement in the planning of such major change.

London boroughs such as Southwark have invested a great deal in capacity building to assist community involvement and, as a result, across London there are many sophisticated networks of community groups involved in the planning process. Boroughs have developed innovative ways of promoting involvement in their plans. In Southwark, the Aylesbury Area Action Plan was adopted with widespread support in the community even though it is an ambitious plan to double the housing density in the area over a long programme of more than 15 years. Close working with the community ensured that they understood and felt fully involved in the decisions leading up to its adoption. The commitment to meaningful involvement of communities in the planning of their areas is reflected in the borough's Statement of Community Involvement (SCI). In the case of Southwark, extensive debate took place during the preparation of the SCI itself with many groups expressing strong opinions about how they wanted to be involved. The SCI was only adopted following an examination in public when these views were fully aired. Community activism is more intense in London than in other places for many reasons: because of the pace of growth, the proliferation of heritage assets, the pressure on infrastructure, the acute housing needs and other social issues. London boroughs are very well used to mediating between many different interests in the planning of their areas and in complex conflict resolution. The neighbourhood planning process being proposed appears to be a very simplistic response in that it suggests that communities will naturally come together with one voice and agree a plan. Southwark's experience is that this is very difficult to achieve. Turning to the first four general questions to be discussed in this review, the comments are as follows:

1. How will neighbourhood planning work in London? What new approaches are needed to reflect London's unique situation?

The Draft National Planning Policy Framework says that neighbourhood plans should

be used to 'plan positively to support local development, with the power to promote more development than is set out in the local plan'. It would appear from this that it is not expected that neighbourhood planning would be appropriate for all areas at all times but it is for communities who support growth and want to explore ways in which their neighbourhoods can benefit from further growth. It has potential to provide those communities with some power to decide where growth will take place and what form it will take. This is presented as an additional tool to supplement the existing tools of the local planning authority that also has the ability to provide an additional level of fine detail that would not be appropriate for the local plan.

It is also presented as a 'bottom up' alternative to the regional spatial strategies covering most of England which are being abolished along with their regionally devised housing targets. In London we still have the London Plan which has been recently updated with new, revised housing targets.

London boroughs like Southwark are responding to these housing targets with local development frameworks that encourage building new housing wherever possible and they aim to achieve virtually all of this growth on brownfield sites. Many communities outside London have the difficult challenge of deciding whether and where to release greenfield land for development but neighbourhood planning in London will not have to face this particular dilemma. In most parts of London virtually every possible opportunity for housing development on brownfield sites has already been considered and will come forward at some stage.

The Strategic Housing Land Availability Assessment which provides evidence for the London Plan and is behind the housing targets goes beyond identifying vacant, prime, brownfield land which is ready for development. It takes into account sites that could provide new housing well into the future. Some of the sites considered are in use for other purposes and may remain so for some time. So neighbourhood planning in London will not be a simple question of whether to 'choose growth'. This choice has already been made. Instead, through neighbourhood plans, communities could get involved in finding sites and opportunities for new housing development that might not otherwise have been recognised or where it was not expected to become available for development for some time to come. As with neighbourhood plans in other areas, one incentive to embrace growth in this way could be the New Homes Bonus.

In Southwark, the neighbourhood planning forum in Bermondsey includes in its membership the Leathermarket Joint Management Board, the tenants' management board that looks after most of the council housing in the area. The board is interested in finding ways of getting beneficial infill development in underused areas of the estates such as old garage courts, undercrofts or other under-used areas. This creative approach to finding sites for new homes in and around housing estates could be taken up more generally in inner London and might have the potential to provide sites for a great many new homes if the neighbourhood is behind it and decides to choose growth. This could be one of the main features of neighbourhood planning in London.

2. What impact will the proposals have on local involvement in planning

As is probably the case anywhere, the biggest movements of local people getting involved in planning happen as a reaction to development proposals that they see as a threat to their neighbourhood. The idea of people coming together to actively promote development in their neighbourhood is quite unusual and it is doubtful whether this would take off in many areas. Although it is accepted by most of the people involved in the pilots in Southwark that neighbourhood planning is not a 'Nimby's charter' and that it should not be used to block development, the initial interest in getting involved has undoubtedly often arisen from concern about the pace of change in their neighbourhoods and a wish to take some control to slow it down or make it less extensive. But people living in central areas like Bermondsey and

Bankside are, at least, used to change and can usually appreciate the benefits of development such as investment in local facilities and the public realm.

Early indications from the neighbourhood planning front runner projects in Southwark are that well-run neighbourhood forums may be able to maintain the involvement of a large number of local people in the planning process – in some circumstances possibly more than could be achieved through conventional public consultation by the local authority.

For example, at a public meeting led and facilitated by the emerging neighbourhood forum in Bermondsey with a council representative only present as an observer, the focus of the meeting on producing ideas and comments about what the neighbourhood plan could do was maintained. It is possible that a council-led consultation might have been diverted into discussions about previous decisions of the council or on how future decisions might be influenced.

There is the danger of raising expectations about the extent to which individuals and small groups can change the direction of growth and development. Some people taking part have appeared to think that the plan making role and the development control decision making role could be removed from the local authority entirely. There is still some ambiguity about how the current local development framework system will coexist with the neighbourhood planning system in the future.

3. To what extent will local people be able to realise their development priorities through neighbourhood plans?

As noted above, it is possible that many people will be drawn into the process believing that it will allow them to stop or significantly slow down the pace of development in neighbourhoods where there is a lot of development pressure. The government has stated that this is not the intention behind the system so in this sense, development priorities such as these would not be realised.

Experience so far has not exposed all of the issues surrounding the way in which neighbourhood forums will work with developers and land owners as local authorities do to ensure that plans are deliverable. If neighbourhood forums seek to prepare neighbourhood plans without involving developers and land owners there is a strong possibility that they would produce plans that are unimplementable wish lists.

As noted above, an important potential use of neighbourhood plans could be to bring forward development on sites which had not been recognised as potential development sites – at least in the short term. These could include sites which are seen as a problem for the area such as derelict sites and buildings that have been dilapidated and deteriorating for some time. If these sites became the focus of a neighbourhood plan, the local authority might be called upon to use compulsory purchase powers to achieve the community's development priorities.

4. How will neighbourhood planning relate to borough-wide and London-wide levels of planning? What support is needed for local communities to understand and take into account the wider planning framework?

Neighbourhood planning has been described as an additional tool providing a level of detail not covered by area action plans and opportunity area planning frameworks. In Southwark, we have been preparing a supplementary planning document (SPD) which will also form the Mayor's opportunity area planning framework (OAPF) for the Bankside, Borough and London Bridge area. Work on this SPD/OAPF has been suspended while the neighbourhood planning pilots in Bermondsey and Bankside are carried out.

The neighbourhood forums carrying out the neighbourhood plans have discussed, during their early stages, producing complex, multi-faceted plans that would completely take the place of the SPD/OAPF. Southwark Council has discouraged this approach and has encouraged the development of neighbourhood plans that add an

additional level of detail to the local development framework. It is our intention to review the situation next year in the light of whatever neighbourhood plans are being produced but it is expected that work will resume on the SPD/OAPF because it will still be needed to provide clear strategic direction in the major development areas that the plan will cover. As has happened in the pilots being carried out in Southwark, the neighbourhood forums may need to be supported through a fairly lengthy process of establishing what in particular the focus of their neighbourhood plan should be.

Neighbourhood plans will be required to be in conformity with the strategic policies of the planning authority. In London this will mean the Mayor's policies as well as the borough's. It will be a function of the examination process prior to a referendum to assess whether a neighbourhood plan is in conformity with the strategic policies suggesting that, at this stage, the plan could be rejected. If this were to happen it would represent a great deal of wasted effort. It is, therefore, essential that there is agreement around the beginning of the process as to what the parameters are within which the neighbourhood plan should be produced. This should include minimum levels of delivery of new homes and jobs in line with the London Plan and the borough's local development framework. It would be useful if, at an early stage, there was an agreed project plan setting out the measures by which the success of the neighbourhood plan should be assessed. This could include the level of community involvement that should be achieved. This would probably help avoid the situation where a referendum on a neighbourhood plan was lost.

The Localism Bill proposes a situation where neighbourhood forums can come forward at any time and in any area to request recognition as the qualifying body and support in producing a neighbourhood plan. As referred to above, neighbourhood plans may not be appropriate in all areas and at all times so there will be occasions when the local authority may consider it inappropriate. This may occur when the local authority, in partnership with the Mayor, Transport for London, other public authorities and land owners/developers are considering strategic plans for a major redevelopment or regeneration programme in an opportunity area. It would not be possible to start considering the finer details of a plan when the broader strategic

decisions have not yet been made. There needs to be a clear understanding of how and when neighbourhood planning may be initiated and when it should not be.

London Borough of Southwark
3 October 2011

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NBH042 King's Cross Development Forum

3 October 2011

Dear Ms Jones,

Response to Community Involvement Planning Questions

Thank you for inviting the King's Cross Development Forum (KXDF) to respond to your Committee's review of Community Involvement Planning. We welcome this London Assembly initiative and are delighted to be able to respond on behalf of the KXDF and its member organisations. We regret that our response has been delayed because of the difficulty of contacting all our member organisations over the summer period but trust that you will be able to note our comments in your published briefing material.

As a local umbrella group the KXDF has achieved, since its inception in 2002, recognition and some success in articulating the views of a wide community that surrounds the 67 acre King's Cross.

Achievements of community involvement

There are many examples of successful community interactions with small and large scale plans and we are encouraged by your proposals to seek greater involvement by neighbourhood groups. A few examples spring to mind:

- Saving St. Pancras station, with the help of Sir John Betjeman
- The Regent Quarter on the east side of King's Cross Station, which without community involvement would have lost its unique character
- Tolmer's Square, to the west of Euston, was saved by an active community campaign
- Some CAACs have proven to be a very effective force with their Local Councils' Planning Departments, developers and the community
- Maiden Lane estate, to the North of King's Cross, where the Residents' Association plays an important role in representing the interests and concerns of that community.

Limitations of community involvement

We recognise the tendency for neighbourhood groups to become active only when there is a perceived threat to their neighbourhood; while this is understandable, legitimate and from time to time necessary, it is usually in response to a planning process that already has momentum.

We also recognise the multiplicity and diversity of 'neighbourhood' groups, depending on their location, interests and the current local development situation, their transient nature and their often 'nimby' or personal objectives. As in the rest of the country, in London such groups tend to be interested in plans only within 'their own village'.

We note that developers and local planners are often seen to be reluctant to involve local communities at an early stage because of the extra effort and cost that this often involves. We therefore welcome your proposals for communities to be informed at the earliest stages and particularly to provide input prior to formulation of plans.

Proposals for neighbourhood groups

We feel that some form of definition, scope and criterion for what constitutes a 'neighbourhood group' should be made clear through your proposals, to ensure genuinely representative community involvement. A short un-bureaucratic form stating: objectives, group constitution and numbers, or perhaps endorsement from local councillors at the Ward level, should suffice for legitimisation.

From time to time there should be some simple check that the aims and objectives of any group are still valid, that they remain representative of their community, and that the group feels, and in fact has been, effective in influencing the strategy, planning and projects in its area of interest.

In response to your specific questions:

- 1. How will [could?] neighbourhood planning work in London? What new approaches are needed to reflect London's unique situation?*

We are asking for greater clarity of the 'Planning Process', the points of interaction, and improved feedback.

It must be made much clearer what local people and neighbourhood groups can actually affect. We believe this will require a major simplification of policy documents, strategy statements, local plans and proposed programmes and projects. The linkage between these documents must be self-evident to new users and easy to track and must highlight the points of public interaction. We believe that much of the planning process mystique could be removed through the use of 'gateways' and 'traffic-lights' to explain the progress at each stage.

Regarding the points of interaction, it is important to know the stages in the planning process when neighbourhoods can, and should, make representations.

- 2. What impact will the proposals have on local involvement planning?*

Unless the process is clarified and simplified as proposed above we feel that, under the proposed more devolved system, it may more difficult to get anything new or innovative approved, because without the clear matching of authority with liability for decisions it could be difficult to prevent the planning process degenerating into legal disputes.

- 3. To what extent will local people be able to realise their development priorities through neighbourhood plans?*

The creation of neighbourhood plans takes concentrated time and effort by some dedicated and professionally qualified people. We are concerned that putting the onus on neighbourhoods to create plans will diminish the role of the local Planning Departments; also we are concerned that few people have the motivation or knowledge to comment effectively on their local plans, thinking through the many interactions and anomalies that these may constrain.

Therefore we believe it is better to use the resources and skills vested in the local Planning Teams to nurture and inform communities about the planning process and plans as they arise (please also see points 1 and 4).

- 4. How will neighbourhood planning relate to Borough-wide and London-wide levels of planning? What support is needed for local communities to understand and take into account wider planning framework?*

A major, continuous programme of training, development and support will be needed to generate and maintain interest at local level. Even then, when a controversial or innovative project is proposed, it is likely

that local opposition will sometimes overwhelm the core of expertise within the community, if this group is too small or too detached from that community.

In today's current financially-constrained environment such training, development and support may not be feasible. Should this be the case we would stress the need for local Planning Officers to be prepared to discuss the plans, at each 'point of interaction' stage, in open meetings, thereby explaining the plans, receiving comments from the community and providing feedback to the community. This will require a fundamental change in Planning Officers' terms of reference.

5. What do you do in your area/group/organisation to get involved in the planning system?

- A. The King's Cross Development Forum (KXDF) is specifically constituted to try and inform and reflect the views of all those interested in the development of the strategically important King's Cross Central site.
- B. It monitors all proposals, attends all strategy, planning and implementation meetings to which it is invited and provides advanced warning (to its 30 approx member organisations) of forthcoming proposals and decisions which affect the King's Cross area.

6. What do you see as the main problems for local communities to engage with the planning system currently?

- A. There is a failure of officials to recognise that many potential responders are only occasionally involved in the planning process and cannot be expected to understand the sequence of events or the time or method by which their opinion can best be registered.
- B. There is a lack of efficient processes by which policy makers and implementation organisations warn interested organisations and individuals that decisions are to be made and where material can be accessed, so that responses can be on time and be relevant.

Please see our comments in point 1 above about the need for clarity of the planning process.

7. What are the main obstacles and barrier to community-led plan making in your area?

- A. Different people are interested or concerned, depending on whether the issue is strategic, project, local, or regional. It is difficult to match the information and the opinion gathering process to each situation and potential population.
- B. There is often a lack of interest in anything but the most local and immediate issues.
- C. People have experienced lack of official feedback to comments in the past, and have developed the view that no notice is being taken of their, and other local, opinions. This leads to cynicism and non-participation.
- D. The difficulty of being sure that opinions gathered genuinely reflects those of the general (mainly supine) populations and not just of those people who have strong opinions or a specific personal agenda.

8. What would you like to see change in the way local communities can influence planning policy and planning decisions in London?

Constraints, Policies, Plans and Implementation Programmes must be simply explained, so that their linkage can be understood by non-specialist occasional participants in the planning process.

9. Do you think the proposals for neighbourhood planning can achieve a positive change and lead to better involvement of the public in London? What else is needed?

In general we welcome and fully support London Assembly's new thinking on the planning process. If implemented well, and without extra bureaucracy, we believe there will be positive change and better informed communities.

However:

- A. Considerable effort must be put into information, education and communication. More feed back must be given to the people who bother to respond. This will require a change of culture for Government, London Assembly and Local Authorities, as well as for potential and actual developers and architects.
- B. There must be much more emphasis on access to policies and plans at an early stage of their development, as well as clarity of the planning process.
- C. Resources will have to be deployed to help with the education and support of all parties including Planning Officers and Council Members that are expected to administer the local effort.
- D. It will be important to avoid bias during community consultation.
- E. Consideration should be given to harnessing the skills and resources within Universities and their Schools of Architecture and Planning, where expertise may be available to support local groups.

We would be glad to take these points further if the Planning and Housing Committee feels that this would aid their decision making process.

Yours Sincerely

..
Chair

sent by e-mail to - alexandra.beer@london.gov.uk

Review of community involvement in planning in London

We should be pleased if you are able to accept this late response to the invitation to contribute to the review, received by email from Jenny Jones on 26 July

Background

Our Society was formed in 1971 and has since its inception been concerned with planning issues affecting Wandsworth town centre and its adjoining areas.

We have a planning sub-committee that meets once a month. It seeks to comment on planning applications likely to have a significant affect on our area of interest. The Society has contributed to consultations on various UDPs the current Core Strategy and the London Development Plan, and has made representation at public inquiries on the adoption of these policies. We have made major contributions at inquiries on specific applications, most notably the Ram Brewery inquiry in 2009.

The Society has also produced proposals outlining its ideas for the future of Wandsworth town centre.

Response

Although we have been proactive in developing our ideas for Wandsworth town centre it seems the greater part of what we do has been reacting to proposals for development and responding to consultations on the preparation of, and inquiries into, Wandsworth's planning policies. Therefore the idea the Localism Bill puts forward, that we could become a part of the planning process, rather than a commentator on it, seems attractive.

However, we have concerns that this will become a meaningful reality.

The definition of a neighbourhood.

While in some places the boundaries of a potential neighbourhood may seem apparent, say a housing estate or housing development, the greater part of our area is less easy to parcel up.

The Localism Bill proposals require that neighbourhood plans can only be prepared by a neighbourhood forum whose membership is limited to those who live or work in area, (or are elected members of a local authority in whose area the neighbourhood area falls). We think there is a danger that this will lead to

neighbourhoods either being too small, and (if you will forgive the expression) parochial – or having to extend to the scale where they will be the size of a ward or borough, and this is not what the Localism Bill envisages..

In our area for example we can see residents groups forming neighbourhood forums of a few streets. However we think people are likely to be interested / concerned with neighbouring areas, where they shop, where their children go to school, local open spaces, places of interest, where they neither live nor work, which will preclude their involvement. To cover this wider interest the area of a neighbourhood would need to be extensive, the equivalent of the local authority areas that exist at present, and thus unnecessary.

Commitment

We, as unpaid volunteers, have not always found it easy to maintain the effort and commitment necessary to participate effectively in the planning process. The seemingly continual need to respond to government initiatives and new development plans year after year is relentless. We fear the new proposals will not make this any easier. Indeed we believe it is likely to be more demanding.

Planning and democracy

We have concerns that in Wandsworth decisions on large developments have been taken on political rather than planning grounds. The majority and the opposition parties hold pre-committee briefing meetings that result in unanimous voting along party lines both at the Planning Applications Committee and at any subsequent full council meeting, even on controversial applications such as the proposal for two very tall towers on the Ram Brewery site in 2009 where a degree of divergence would be expected.

Earlier this year local neighbourhood opposition resulted in a decision against an application for development at Springfield hospital, against the recommendation of planning officers. The Society believes the planning officers were right to recommend the application for approval and that public opinion was ill informed resulting in a bad decision.

These two examples demonstrate key problems in achieving good planning outcomes that we do not think the Localism Bill will resolve.

Neighbourhood plans can be adopted by a simple majority of those who vote. Turnout at local elections is generally in the order of 39%, we think it will be a lot lower for a referendum on a local plane. We believe there should be mechanisms in place to prevent plans being implemented by unrepresentative minorities, or commercial interests.

We believe that the current planning system works reasonably well. We do not believe that defects in the present system will be remedied by the proposals in the Localism Bill.

Yours truly,

Chair
The Wandsworth Society

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.. **NBH044 London Civic Forum**

Submission by London Civic Forum **Community Involvement in Neighbourhood Planning: A London Assembly Investigation**

This response is based on London Civic Forums considerable experience supporting Londoners to have the skills, knowledge and experience to understand, engage with and influence policy and decision making in London. We have developed specific expertise in the area of planning through our work supporting community and voluntary organisations engage with planning at local, borough and London wide levels. We were one of the co founders of the Just Space Network which is a regional network of voluntary and community sector groups that engages with the planning system across London and across all levels.

Specific areas of work have included:

- In partnership with the Just Space Networking we supported community and voluntary organisations respond to the draft London Plan and to then give evidence to the Examination in Public.
- Over the past 3 years we have supported local community organisations understand and respond to planning policies in their local authority areas through our capability sessions.
- We have worked with the London Assembly on an event which sought the views of planners, local authorities and community groups to this investigation.

Background

The government's Localism Bill Act offers communities the power to shape their local neighbourhoods. It means that local communities will need to organise into a neighbourhood forum and define the boundaries of their local neighbourhoods. They can then create a neighbourhood plan and define specific developments or types of development which will have automatic planning permission. Local planning authorities will have a formal duty to provide advice and support to communities in developing proposals for plans and orders. The council can adopt a neighbourhood plan after it has been successfully passed by a local referendum.

However London is unique in many ways and therefore presents its own unique challenges to the concept of neighbourhood planning - for example it is a hugely diverse city, with people of many different needs living side by side. London is divided into the 32 Local Authority areas and the City of London but with neighbourhoods which may not be so easy to define, sometimes overlapping across Local Authority Boundaries. It has also, unlike other regions, the London Plan, with which neighbourhood plans will have to comply with alongside Local Authority and national planning frameworks.

Barriers to Community Involvement in Planning

London Civic Forum has identified some of the key barriers to community involvement in planning. These include:

- Planning processes which are bureaucratic and multi layered demanding a level of technical expertise, time and resources which many communities do not have or have access to
- A lack of information and/or resources to enable effective participation on either a local, borough or London wide level
- Lack of trust between Local Authorities and communities where communities feel that consultations are merely tick box exercises and that planning decisions have already been made
- Lack of recognition of the expertise and knowledge existing within local communities
- Lack of skills and knowledge among planners about how to work with communities
- Reluctance or inability of Local Authorities and developers to work with communities as equal partners in the development of planning policy on a local, borough or London wide level

Far too often these barriers have resulted in the exclusion of communities in the decisions that impact on their lives. These issues will need to be addressed if the powers within the Localism Act are to empower communities rather than marginalise them further

Recommendations

London Civic Forum would offer the following recommendations in three areas to Local Authorities, the London Assembly and the Mayor

Support collaboration not consultation

It is essential to ensure that community involvement is at the heart of any planning process- whether that is at neighbourhood, borough or London wide level. Both Local Authorities and the Mayor need to ensure a collaborative approach to any planning. To enable and support this collaboration:

- Local Authorities should recognise local knowledge and range of skills and experience within their communities and invest in the capacity of their local community to engage with planning at both a neighbourhood and borough wide level.
- Communities need to be involved in the development of planning at the outset rather than 'consulted' once plans have been made
- There are existing strategies and policies in place to provide support e.g. Statement of Community Involvement - these should be developed in partnership with the communities.
- Local Authorities should set out consultation requirements and principles for developers when they are working with communities
- Provide full information in plain English so that communities understand the underlying processes behind consultation options
- Develop new process of tension resolution locally to ensure that Neighbourhood Plans do not conflict with Local Development Frameworks
- Support and encourage ward councillors to act as champions for their local communities and work closely with local networks of people
- Provide a platform at borough and London wide levels for people to discuss and input into major issue such as privatisation and affordable housing
- Communities may be best served by an independent intermediary, a community engagement specialist who can support communities, local authorities and developers to work collaboratively
- Local authorities could look to communities to develop neighbourhood plans as building blocks that make up the basis of the Local Development Frameworks
- London is divided into the 32 Local Authority areas and the City of London but with neighbourhoods which may not be so easy to define, sometimes overlapping across Local Authority Boundaries so it is necessary to encourage and support cross Borough collaboration, negotiation and learning.
- The Mayor should develop his own Statement of Community Involvement similar to those developed by Local Authorities and which puts community involvement at the heart of London wide planning policies.
- The Opportunity Area Planning Frameworks should ensure that community involvement and neighbourhood planning are central to their development

Provide access to expertise and resources

Planning can be bureaucratic, time consuming, filled with technical jargon and seeming to bear little relationship to the ordinary lives of Londoners. Even for those who have the capacity, knowledge and skills to be actively involved it can prove to be a frustrating and resource intensive process.

In order to ensure that communities have the capacity to fully engage with and, in the case of Neighbourhood Planning, lead planning policy development they need to have access to adequate resources and expertise.

Local Authorities could provide support and advice on:

- Forming legal entity and direct groups to sources of funding
- Develop database of local expertise. architects, planners, social expertise, technical expertise which communities could access and add to
- Knowledge of planning frameworks
- An inventory of community assets which they have developed in partnership in partnership with their residents
- Provide end of the phone line support and information
- Local Authorities could support groups find funding and expertise e.g. they employ traffic engineers who may not be independent but LAs do also hold lists of experts they have worked with before but do acknowledge these are not cheap
- Local Authorities should use a range of mechanisms and networks to disseminate information including social media and face to face meetings

The Mayor should:

- Be responsible for ensuring that Londoners understand London Wide planning issues and their impact at borough and local level and . This will include providing the opportunities and resources to community organisations to enable them to engage with the development and implementation of the London Plan

Support learning and development

- Alongside the need to ensure that communities have the capacity, skills and information to effectively engage with planning policy it is equally important to ensure that Local Authorities and developers have the necessary skills and knowledge to work with local communities. This should include street level community development processes and engagement techniques. Supporting and training planners and communities will minimize confrontation and maximize collaboration
- Unlike other regions, London has a regional planning strategy, the London Plan, with which neighbourhood plans will have to comply with alongside Local Authority and national planning frameworks. There will need to be support and learning opportunities available to communities across London to enable them to understand the Neighbourhood Planning process and the wider strategic issues and their impact at a local level to enable them to challenge strategic assumptions and offer their own solutions

The Mayor and Local Authorities should:

- Support existing peer to peer learning support networks, such as Just Space, which can bring together community organisations to share experiences and expertise across neighbourhood and local authority areas and support them to engage with planning at local, borough and London wide levels

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.. NBH045 Just Space Network

. This is a submission by the Just Space Network to the London Assembly Review of Community Involvement in Planning in London.

The submission responds to the following questions: -

- *What are the main problems for local communities in engaging with the planning system?*
- *What would you like to see changed in the way local communities can influence planning policy and planning decisions in London?*
- *Can the proposals for neighbourhood planning achieve positive change and lead to better involvement of the public in planning in London? What else is needed?*
- *How will neighbourhood planning relate to Borough-wide and London-wide planning levels?*

The value of the Just Space Network

Just Space is a regional network of voluntary and community sector groups that engages with the planning system across London at the metropolitan, borough and neighbourhood levels.

The network is characterised by: -

- *its diversity*: it brings together a productive diversity of groups operating at different scales: from large voluntary sector organisations (with paid staff) to local and activist groups.
- *its horizontal, deliberative mode of operation*: decisions are made by consensus through extensive participatory processes between member groups.
- *its support function*: Just Space is seen as a space for the co-learning and sharing of information around planning processes

The Examination in Public of the London Plan in 2010 heard from about 50 community groups, many of whom would not have had the capacity to take part without the mutual support provided by the Just Space Network.

Through the network, there has been a huge amount of accumulated knowledge (about planning processes, about the potentials and pitfalls of participation in planning processes, about the London Plan, about city-wide planning in general, about the activity of Just Space members) – a huge co-production of knowledge which is shared on the Just Space Network website
<http://justspace2010.wordpress.com/>

The barriers

Planning is usually seen as the domain of governments, private consultancies and developers. It tends to wrap itself up in claims about expertise, technical competence and professionalism. A system couched in technical language and formal documents. Some of the barriers we come across are: -

- Hard to access information, including research output
- Absence of community involvement in shaping research - by planning authorities, government, universities etc
- Negative assumptions about some communities e.g. about social housing tenants and Gypsies and Travellers
- Placing highly technical burdens of proof on communities to challenge policy proposals ("evidence based")
- The difficulty of finding your way through the different levels of the planning system
- Little to indicate that the commitment to participation is more than lip service and the gap between policy and practice is immense
- Engagement' has become institutionalised – designed to enable the authorities and developers/consultants to do the 'consultation', tick the boxes and claim public support for their development ambitions
- Council planners who are pessimistic about the positive effect of participatory planning and don't really know what to do with the input they get or, in particular, what to do when that input conflicts
- The plethora of participatory techniques used by planning consultants which are imposed on community groups rather than being grounded and genuinely collaborative
- The whole idea that "We're professionals. Professionals can solve it way better than community groups"
- Barriers of finding the time that is needed / loss of earnings / travel and childcare costs / absence of podcasts and transcripts (GLA as well as Boroughs)

What is needed at all levels?

Yet planning is a potentially far more democratic activity than this. And that's because it offers all of us, as citizens, the opportunity to think and act creatively about the future of the places we live in, to create alternative visions.

There are many examples of community led plans in London which have succeeded in stopping bad public and private led development proposals and realising alternative community inspired visions in their place. Covent Garden, Tolmers Square, Coin Street, Royal Docks, Kings Cross, Wards Corner are just some. The following are the principles that underpin community led plans and which need recognition and support from developers and public bodies.

- A Community Vision - identifies local needs and aspirations, highlights local issues and priorities

- Involvement –production by and for the local community grounded in consultation organised by the community
- Local control – active participation in the public decision-making process that develops local planning policy
- Resources and support –links with organisations that can provide practical help and guidance, including information, training, technical advice and material resources.

However, it is neighbourhood planning we wish to emphasise, rather than neighbourhood plans. Neighbourhood planning has the potential to focus on both local need and strategic issues, and as a process should go hand-in-hand with area based planning policies.

There needs to be recognition of the high value of community organising skills (including outreach, interviews, 1-to-1 support, facilitation, mediation, and presentation skills) and of local community history, local networks, local services and the role of formal power structures. Starting with the issues that matter to people, understanding the structure of the community and its complexities.

From our experience, the following are essential pre-requisites for neighbourhood planning: -

1. To recognise the community as a partner
2. To make collaboration, openness and transparency a normal part of the planning mindset
3. Continuous engagement, instead of shock waves of trying to gain last minute input after plans or schemes are drawn up.
4. "Neighbourhood" issues can never be entirely separated from borough or London-wide processes. Equally, not all communities are defined by their locations; some such as environmental groups and Gypsies and Travellers exist primarily across localities.
5. Therefore, an integrated knowledge of planning and the urban context must operate at all levels across London and be rooted in communities.

What is needed at the regional level?

The Mayor and the London Assembly need to provide the levers to help communities prise away powers from the Boroughs. The principle of community participation should be strongly embedded within the London Plan, and its supporting documents, to enable the implementation of its policies and to ensure it

is supportive of the localism agenda at borough and neighbourhood levels. In particular, Opportunity Area Planning Frameworks (OAPF's) which are a joint production between the Mayor and the Boroughs should be developed with a neighbourhood planning process at their heart.

We are calling for the development of a Mayor's Statement of Community Involvement, which will provide an essential resource and framework for developing, implementing and reviewing effective and inclusive community participation, and will increase the influence of communities over the development of their areas.

Through the Mayor's Statement of Community Involvement (SCI), the Mayor will ensure that development is underpinned by, and shows due regard to, the participation of all Londoners at all stages of strategic and local planning and decision making.

There could be a Mayor's SPG or Best Practice Guidance on community engagement, but our preference is for a Mayor's SCI to inform the Implementation Plan and apply to: -

- the Mayor's Strategies, SPG's, research and toolkits
- the Planning Frameworks for Opportunity Areas and Regeneration Areas
- the Annual Monitoring Report
- major planning applications referred to the Mayor's Decisions Unit

The SCI should include a number of sub-headings:

1. Activities the SCI covers
2. Sharing information and the different formats for information provision. A clear statement on freely available information and information that has to be paid for.
3. A database of consultees, and how the database will be developed and added to
4. Engagement methods, appropriate to the needs of different groups and different levels of involvement
- *5. The resources that will be available to ensure everyone who wishes to has the capacity to participate, such as administrative support and access to technical advice and training. The Mayor should be working with HE and FE organisations to ensure that Londoners have access to high quality learning support services to engage with planning.

6. The Mayor's decision making process and the mechanisms that will make it open, fair and transparent

7. Monitoring and review of the SCI, including a voluntary and community sector perspective.

* On this point, we seek recognition by the Mayor and the London Assembly that since the voluntary and community sector do not have access to the same resources as the public and private sectors there is a need for training, learning, technical advice and administrative support. The Mayor and the London Assembly should identify resources to facilitate the sustained and informed involvement of the voluntary and community sector.

We consider community participation and the facilitation of the localism agenda an essential strategic issue for the Mayor and the London Assembly. It is not just about process, but is a policy and institutional issue on which the legitimacy of plans and decisions depends.

November 2011

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NBH046 Prof Duncan Bowie [University of Westminster]

MATERIALS SUBMITTED BY PROF BOWIE ARE AVAILABLE SEPERATELY ON REQUEST

From: Duncan Bowie]

Sent: 01 December 2011 16:57

To: Alexandra Beer

Subject: Neighbourhood planning material

Attached my paper and presentations with other presentations from my conference last Friday.

Duncan Bowie

Senior lecturer in spatial planning

University of Westminster

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ATTACHED:

Paper for RSA Conference 3 Nov 2011.doc
Build Up Localism Concepts 25 11 11.ppt
Build Up Localism 25 11 11.ppt
Build Up. Localoism.Community Based Planning in London.ppt
111122 University of Westminster conference_SB.ppt
N Plan UofW Nov 11.ppt



From: Duncan Bowie [mailto:D.Bowie@westminster.ac.uk]

Sent: 01 December 2011 17:04

To: Alexandra Beer

Subject: More on neighbourhood planning

Duncan Bowie

Senior lecturer in spatial planning

University of Westminster

ATTACHED:

Westminster PPT.ppt



From: Duncan Bowie

Sent: 01 December 2011 17:07

To: Alexandra Beer

Subject: International project on localism

This may be of interest. Funding not confirmed yet

Duncan Bowie
Senior lecturer in spatial planning
University of Westminster

ATTACHED:

RSA Research Network Application 30 11 11 draft.doc



Received Separately:

Research Seminars Proposal for ESRC Research Seminars Competition 2011-12 [File: **(jes – 1098846-2.pdf)**]

..
NBH047 [Member of the Public]

From: []
Sent: 30 December 2011 16:27
To: Alexandra Beer
Subject: Re: Planning

Dear Alexandra,

Yes it is. Sometimes the corruption and hypocrisy of the Camden Planning Department hits you in the face, such as when they allowed the people who bought The Joint, a one-storey building next door to us, to build a five-storey block of flats, that blocks out the ancient lights to which our freehold entitles us and that is built in a neighbourhood that is largely non-residential. How did the developers get the right to do this? It hits you in the face. Naturally, all the people in the four houses that make up our group of listed buildings objected, our objections were not even considered.

On 30 Dec 2011, at 15:34, Alexandra Beer wrote:

Dear Josephine,

Thanks for your message. Could you confirm whether this is in response to the Committee's review of community involvement in planning, or, if not, what prompted your email? That would be really helpful.

Best regards
Alex

Alexandra Beer
Assistant Scrutiny Manager
Planning and Housing Committee
LONDONASSEMBLY
CITY HALL
THE QUEEN'S WALK
LONDON
SE1 2AA
Tel: 020 7983 4947
Fax: 020 7983 4437

-----Original Message-----

From: []
Sent: 30 December 2011 11:53
To: Alexandra Beer
Subject: Planning

Dear Ms. Beer,

You asked for comments about planning. I write from my own experience and that of other people

Despite the previous government having ordered local government planners to become more flexible, in Camden at least they are as domineering and inflexible as ever. I particularly object to the inflexibility regarding listed buildings. I live in a listed building and there is only one aspect of it that deserves listing – the frontage. Despite this, Camden Council threatened us with a £10,000 fine if we did not remove some of the air conditioners at the back of the house, despite the fact that the back of the house is completely invisible from any road because it does not back on to a road but on to another house.

Our flat roof at the back of the first floor of our house, which was the garden, originally built over in 1923, would be the ideal spot for solar panels. So would our south-facing roof. But we are not allowed to fit either because we are a listed building. Other far more important listed buildings have been able to do so because they have more clout and more money.

I have family living in the Mapesbury Conservation Area, one of the fiercest in the country. They were threatened with death and destruction and had to consult an expensive solicitor because they turned what had been a shabby wooden lean-to attached to their house into a tasteful brick-built extension that was no larger than the previous structure. But one of their neighbours has completely revamped the back of the house, digging out a basement (possibly weakening the structure) and putting in a picture window. How did he get away with it? Because he is a solicitor!

Anyone who has had dealings with the Planning Department – and especially in Kings Cross – sees it as inflexible to ordinary people but open to corruption from developers and others with deep pockets.

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..APPENDIX: Record of the Questions Posed during this review

Note: The wording of these Questions varied slightly depending upon the recipient of the request for evidence/comment. Further details are available from Assistant Scrutiny Manager Alexandra Beer (See Report for contact details)

Review of community involvement in planning in London

The London Assembly Planning and Housing Committee has agreed to review whether the new opportunities and procedures for community involvement in the planning system beyond simple consultation will be effective in London and what, if any, improvements need to be made.

I am writing to request your help with this review.

The purpose of the review is to investigate opportunities for London's communities to develop their own plans which reflect local priorities and to remain involved with the implementation of those plans and planning decisions. It will assess how well neighbourhood planning can operate within the unique hierarchy of planning that operates in London – both at regional and borough level – and how strategic and local objectives match up.

Your contribution is sought on all or some of the following general questions:

1. How will neighbourhood planning work in London? What new approaches are needed to reflect London's unique situation?
2. What impact will the proposals have on local involvement in planning?
3. To what extent will local people be able to realise their development priorities through Neighbourhood Plans?
4. How will neighbourhood planning relate to Borough-wide and London-wide levels of planning? What support is needed for local communities to understand and take into account the wider planning framework?

We are also very interested to hear about some more specific issues. For example:

5. What do you see as the main problems for local communities in engaging with the planning system currently?
6. Do you think the proposals for neighbourhood planning can achieve a positive change and lead to better involvement of the public in London? What else is needed?
7. Is there a need for new and innovative ways of providing advice and support to local communities and what could these look like? Who should (and can) be involved and how could support be funded?
8. What are the practical implications of neighbourhood planning for proposed development? For example regarding the level of engagement and consultation between developers or applicants, local planning authorities and local people.

If there is any other information you think is relevant to the review please let us know.

The Committee is keen to gather the views of a wide range of Londoners and stakeholders over the summer to inform two public hearings we will hold and **we will be conducting an online engagement exercise in September**. Details about how to take part will appear on the investigation page here:

http://www.london.gov.uk/who-runs-london/the-london-assembly/assembly_investigation/community-involvement-planning

The questions above relate to the term of reference for the review that is:

- To review existing opportunities and challenges for community involvement in planning in London and possible future solutions that could enable all Londoners to get involved both in plan and policy making and in the control of development.

If you want to find out more about our review, please visit our web site http://www.london.gov.uk/who-runs-london/the-london-assembly/assembly_investigation/community-involvement-planning or contact the Assistant Scrutiny Manager, Alexandra Beer.

We will use all written views and information provided to inform our next committee meeting on 18 October 2011, possible subsequent meetings and our report, which we expect to publish next year.

I would be grateful if you could send any response to these questions electronically to Alex (email alexandra.beer@london.gov.uk) or alternatively to the abovementioned address at City Hall. I would appreciate any information you could send us by **5 September** (electronic copies are especially welcome).

We are keen to hear from a wide range of organisations and individuals as part of our review. If you are aware of any other organisations or individuals that many want to contribute their views, please forward this letter to them or let us know their contact details.

Unless your written responses are marked confidential, we may copy them to others as part of the project. Please state whether you would like your response kept confidential at this stage. Under the Freedom of Information Act 2000 we are required to release copies of your written responses if members of the public or the media request them. In due course, we will publish all written evidence together with the final scrutiny report on the London Assembly's website.

The Committee appreciates your help in this review and we look forward to receiving your comments.

Yours sincerely,

Jenny Jones AM

Chair of the London Assembly Planning and Housing Committee

*Sent on Behalf of the London Assembly Planning Committee by **Michael Walker***

.[END]