

Responses to the *Localism in London* questions in relation to neighbourhood planning in London

Why is interest so limited?

- Are the requirements for designating neighbourhoods, in terms of boundaries, membership and competing interests, simply unworkable in London?

Response comments

1. *Planning may not be a panacea, so it cannot please everyone all the time, but may add to engagement and inclusion of a range of interests and supported by neighbourhood planning. This may extend the statutory consultation regime currently practiced in the city and as such, may not be unworkable, as a prospect. In the view of an urban economist, the city [London] is 'not a blank slate', so issues may present a challenge, to introduce neighbourhood planning, in the established city's fabric.¹*

¹Reference: Talk by Director of Policy and Research at Centre for Cities, at RTPI London 'Resilient Cities seminar', 17/11/2014

2. *Widespread neighbourhood designation in London may be possible with guidance from a higher **level planning authority**, with an ability to issue **policy and guidance for neighbourhood planning in London**, which is **material consideration, in plan examinations** by The Planning Inspectorate.*
3. *Potentially there could be scope for **more London Plan policy guidance** and e.g. a '**London wide framework for neighbourhood planning**' and guidance by the GLA (SPG or other policy mechanism). Then boroughs and their neighbourhoods' could 'colour in' the structure in specific ways, to suit boundaries, membership and competing interests.*

Comments, by Adam Cook, RTPI London member

2

4. *Whilst neighbourhood planning may work in one location - it may not work everywhere using the same methods. Perhaps this implies the need to carefully tailor the approach to each location in London, considering neighbourhood planning.*

Ref: The Heart of Our Cities: The Urban Crisis: Diagnosis and Cure, by Victor Gruen, 1964, Questions whether what was done on Greenwich village can be duplicated anywhere else.

Letter in Planning Magazine 16/1/2015, Burden of neighbourhood plans limits their appeal, page 12 Reserved view of prospects of neighbourhood planning in practice

Available at: <http://www.planningresource.co.uk/article/1329174/burden-neighbourhood-plans-limits-appeal>

5. *Local green infrastructure has an important role in neighbourhood planning, I.E. for proactive treatment of open space and other features. This may better accommodate competing interests in London.*

Ref: Local Green Infrastructure, Landscape Institute, available at:

http://www.landscapeinstitute.co.uk/PDF/Contribute/LocalGreenInfrastructurewebversion_002.pdf

6. *Effective Citizen engagement in administrative 'action space' is one of neighbourhood planning challenges. The notion of 'place based leadership', in Melbourne, Australia, has been published in the RTPI Journal, The Planner' January 2015, pages 30-33, which links 5 areas of influence (sources of legitimacy) and which by their intersection, form a 'potential innovation zones', i.e:*

- i. Political leadership*

- ii. *Managerial and Professional leadership- the ability to respond in dialogue, e.g. with land management stakeholders and decision makers, on specific issues and opportunities in 'neighbourhood planning')*
- iii. *Community leadership- including tenants potentially being displaced by wider regeneration of an area.*
- iv. *Business leadership- shifting the business of plan consultation to encouraging support by business [social entrepreneurs and enterprise] and developers, to facilitate 'engagement' in plan making.*
- v. *Trade Union leadership- promoting wellbeing in relation to pay and conditions*

Does this theory suggest that it may be possible to admit more citizen participation into London plan-making, at neighbourhood level and thus overcome obstacles and competing interests?

- How can we overcome the barriers to getting a forum recognised?

Response comments

1. *The governments reported wishes to see **deadlines for neighbourhood area designation**, may help **encourage boroughs, in dealing with their neighbourhood planning workload.**²*

²Reference: 'Planning Magazine', 'Longer plan determination time 'may not be enough', 18 January 2015, page 11.

2. *Once the outcomes are known, there should be a welcoming by boroughs, of planning decentralisation in London, through structured neighbourhood planning.*

Comments, by Adam Cook, RTPI London member

4

3. **Knowledge sharing** on the processes and priorities for Community Infrastructure Levy (CIL) and **highlighting CIL objectives, via neighbourhood planning** may be a challenge for boroughs. How could the GLA assist the boroughs on this point?
4. How could the London **plan raise awareness, of the resource benefits for neighbourhoods', under the new system.**

Why is interest so concentrated?

- Do affluent communities with access to professional expertise to drive the formation of neighbourhood forums have an advantage over those with less capacity or history of community organisation?

Response comments

1. *Planning magazine reported that only 10% of neighbourhood plan applications were being made in 20% most deprived English areas. Is there a link between deprivation (lack of professionals in the community) and the prevalence of neighbourhood planning, in affluent areas over non-affluent areas?*³

³Reference: 'Planning Magazine', 'Poorer areas see few local plan applications', 25 March 2013, pages 4-5

2. *How could the London Plan and GLA enable greater neighbourhood planning in non-affluent areas, with an apparent lack of professionals. Are these areas possibly the most dependent on public resources, in terms of planning for community infrastructures, health and wellbeing, that could benefit neighbourhood planning?.*
3. *Are indices of environmental wellbeing (a 'happiness index'), relevant to assessing prevalence of neighbourhood planning, as alternative and or together with IMDs?*

Why is progress so slow?

Comments, by Adam Cook, RTPI London member

5

- To what extent are financial considerations and the budget pressures on local authorities slowing down the progress of neighbourhood planning in London?

Response comments

1. *Boroughs may face a budgetary struggle in promotion and user training on the potentials for neighbourhood planning and e.g. devising preparing a **borough wide framework and policies for neighbourhood planning.***
2. *The government's allocation of resources specific to processing single neighbourhood plans, may cover some costs and so neighbourhood planning budget, may not be a major issue for boroughs, in relation to specific neighbourhood areas, submitting applications.*
3. *There may be complacency in a **reliance on 'planning obligations'**, perhaps with the incentive of affordable housing (AH), **rather than embrace of the Community Infrastructure Levy (CIL)**, with less AH incentive (CIL legislation prepared by the last government and brought into force, with only minor amendment by the coalition). This may present a **new regime for supporting community infrastructures and allocating resource benefits, via neighbourhood plans, eligibility to claim resources under the CIL regulations.** This prospect is detailed in boroughs' CIL charging schedules.*
4. *The issue of housing despite CIL currently not supporting AH, may remain acute in neighbourhood planning and as such guidance on economic viability assessment from the GLA, for boroughs for neighbourhood plan areas may be welcome.*

Is enough support being given?

Comments, by Adam Cook, RTPI London member

6

- Would greater promotion for neighbourhood planning in London's opportunity areas both further the aims of localism and regeneration and boost a sense of legitimacy and support in these areas?

Response comments

There is a lack of evidence to enable any coherent response on legitimacy and support, but to begin investigating this point:

1. *Would the London Assembly be in position to determine: How many London boroughs, made applications to the Department of Communities and Local Government (DCLG), for 'forerunner' status?*
2. *Out of any applications made to the DCLG for 'forerunner' status, what proportion of these were successful or not, in gaining 'forerunner' status?*
3. **How many neighbourhood groups in boroughs' have made application for government support**, e.g. under Building Communities Consortium, or government 'Supporting Communities in Neighbourhood Planning' or other grants and support programmes?
4. **Out of neighbourhood groups in boroughs applying for support in question 3, what proportion of these were successful or not, in gaining support?**

Views are sought on the following questions in relation to assets of community value in London

Are boroughs interpreting the legislation consistently in London?

- Why are there so few listed assets in some boroughs?
- Are boroughs interpreting the legislation consistently?

Response comments

1. *There may be need for legal clarification on e.g. exemption from ACV status in planning decisions. That the procedure may be ineffectual in significantly influencing development management, e.g. on a cumulative basis.*

Can assets of London-wide importance be covered by the guidance?

Response comments

1. *ACV is a designation and not a policy as such, unless paired with e.g. specific neighbourhood planning policy and guidance. Positive planning for assets of London wide importance may be required to be explored, to complement this approach for cumulative benefits to be realised..*
- Given London's city wide communities, is the legislation supportive of recognising assets on the basis of communities of interest rather than communities of locality?

Response comments

1. *Could the GLA SPG 'Character and Context', June 2014 provide a model for preparing evidence bases, to ensure that 'communities of locality', can be supported in the city neighbourhoods, using the ACV designation?*

Comments, by Adam Cook, RTPI London member

8

Associate of the Royal Town Planning Institute, RTPI London member

- Planning Aid for London, September 2009- Oct. 2013
- London Planning and Development Forum- LI London co-opted committee representative, 2008-2012;
- Affiliate Member RIBA 2007- current
- Landscape Institute (LI) roles:
 - Panel Delegate at: 'London Plan Enquiry in Public (EiP)' on behalf of LI London, October 2010
 - Acting Hon. Treasurer LI London 2010- 2011;
 - Past- Chair, LI Council Representative and Acting Hon. Treasurer LI London 2009- 2010;
 - Past- Chair, LI Council Representative LI London and LI
 - Trustee, 2007-2009,
 - Chair Executive Committee LASE, 2005-2007;
 - Hon. Secretary, Landscape Architecture South East, (LASE), 2003-2005

26/1/2015