

STATEMENTS OF COMMUNITY INVOLVEMENT

Are London's supporting neighbourhood planning?

A report from
Neighbourhood Planners.London
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OVERVIEW

This report is the third in a series published by <u>Neighbourhood Planners.London</u> - the network of neighbourhood planners in the capital. Each looks at the way in which individual London Boroughs and Mayoral Development Corporations deal with specific planning requirements which impact on neighbourhood planning activity.

Previous reports assessed the way in which London's planning authorities have featured the neighbourhood planning framework within their <u>Local Plans (2017)</u> and in their treatment of the neighbourhood element of the <u>Community Infrastructure Levy (2016)</u>. Both publications are available to <u>download</u> at Neighbourhood Planners.London's website

Each report involves a survey reviewing relevant website content for every London planning authority¹.

This latest survey looks at the way in which London's planning authorities have implemented new requirements in the 2017 Neighbourhood Planning Act relating to Statements of Community Involvement. The survey looks at this specific issue and more widely at other related guidance and advice included on London local authority web pages on neighbourhood planning.

The overall picture from the previous two surveys is largely confirmed:

- A wide disparity remains across London LPAs, in the extent to which they provide information, support and encouragement to neighbourhood planning, in their publications and website content
- A similar pattern has emerged in all three surveys showing linkages between the levels of
 information, guidance and useful content provided by LPAs and the progress made by
 neighbourhood forums in the relevant part of London
- As a general rule, those LPA areas which demonstrate strongest recognition of the role of neighbourhood planning in their publications and web pages are those with most neighbourhood forum activity and 'made' plans
- Those boroughs which remain 'desert areas' with no designations to date of neighbourhood areas and forums are largely also those which give least recognition to the neighbourhood planning process in all online material on their planning services.
- A small handful of 'reluctant' Boroughs make clear they would rather their residents did not go down the neighbourhood planning route. They and some others highlight the obstacles involved and not the opportunities.
- Some of this negative advice and guidance published by London LPAs is inaccurate, and in some cases open to legal challenge.

In the case of this latest survey, the most significant conclusion is that every London planning authority with one exception (Lambeth) has so far failed to note, or chosen to ignore, new measures in the 2017 Neighbourhood Planning Act designed to strengthen neighbourhood planning as a community-led and localised layer of the English planning system.

¹ Any desk research of this kind has limitations. It is possible that we have missed documents or web pages relevant to this research if (for example) they do not come up on search facilities. We have tried hard to track down all relevant material and will be happy to correct any errors reported to us.

Some readers of this report may find it over-critical of planning authorities. London planning departments have heavy workloads and many issues to think about. Failure on their part to update and refresh the content of a Statement of Community Involvement may be viewed as a minor lapse.

Where LPAs are criticised in the survey for gaps in information provision, it can also be argued that a 'minimal information' approach to neighbourhood planning results from 'minimal resident enthusiasm'. And that the planning authority in question is simply reacting to a lack of local interest in using the neighbourhood planning framework.

Evidence from the three surveys carried out by Neighbourhood Planners.London, and from discussion at our conferences and workshops over the last three years, suggests there is a correlation between quality of information given out and levels of neighbourhood planning activity on the ground.

Preparing a neighbourhood plan and carrying the process through to its conclusion is a challenging task for any local community organisation or group of residents. When faced with a lack of high quality information about the process, or any signals of support and encouragement from the local planning authority, the hill becomes that much steeper to climb.

This is why Government in the six years since the neighbourhood planning regime became operational, has tried hard to streamline and strengthen the process and to make it more citizen friendly. Timetables for each stage of the process were imposed on reluctant or dilatory planning authorities, through the 2015 Regulations². The 2017 Neighbourhood Planning Act went further, by including new measures requiring extra content in Statements of Community Involvement.

STATEMENT OF COMMUNITY INVOLVEMENT

The requirement on local planning authorities to prepare and publish a Statement of Community Involvement (SCI) was introduced by Section 18 of the 2004 Planning and Compulsory Purchase Act. The purpose of these documents, as defined at that time, is to provide "a statement of the local planning authority's policy for involving interested parties in matters relating to development in their area"³.

SCIs form part of the suite of statutory Local Plan documents. Initially the quality of a SCI was subject to examination by planning Inspectors at Examinations in Public of Local Plans. But this requirement was dropped in the 2008 Planning Act⁴

As these survey results show, a number of London LPAs prepared SCIs subsequent to the 2004 Act and have not revised them since. Those that date from the 2006-8 period are: **Bexley** (with a brief addendum in 2009), **Hillingdon**, **Kingston**, **Lewisham**, **Merton**, **Redbridge**, and **Southwark**.

² Neighbourhood Planning (General) (Amendment) Regulations 2015

³ Explanatory notes to 2004 Planning and Compulsory Purchase Act.

⁴ Subsection (3)(a) of Section 180 of the 2008 Planning Act removed the requirement for the statement of community involvement to be specified in the local development scheme and subsection (4)(c) removed the requirement for an independent examination of the statement of community involvement.

This lack of updating suggests that within these authorities the SCI publication is not seen as a useful tool for community engagement (as intended by Government) but merely as an accessory to the Local Plan process — a publication which can sit on a shelf. In some of the above councils, a copy of the SCI can only be found online by searching via 'Local Plan' and/or 'technical documents'. This is not a place where the 'community' will necessarily look.

The majority of Boroughs have updated their SCIs once if not twice in the past decade, to incorporate changes in the planning system including the 2011 Localism Act and publication of the 2012 National Planning Policy Framework (NPPF).

The 2017 Neighbourhood Planning Act (NPA) introduced two additional measures, in terms of the content of SCIs. Section 6 of the Act requires that a Statement of Community Involvement "sets out the local planning authority's policies for giving advice or assistance under—

(a) paragraph 3 of Schedule 4B to the principal Act (advice or assistance on proposals for making of neighbourhood development orders), and

(b) paragraph 3 of Schedule A2 to this Act (advice or assistance on proposals for modification of neighbourhood development plans)."

The policy background to the Government's addition of these new statutory requirements was described in the Explanatory Notes to the Neighbourhood Planning Bill as follows: "The Bill also makes the duty on local planning authorities to support neighbourhood planning groups more transparent and improves community involvement in the early stages of plan-making."

The first of these new requirements is generally viewed as reinforcing the 'duty of support' placed on local authorities by the 2011 Localism Act⁵. A local planning authority (LPA) now needs to spell out the 'advice and assistance' it offers to neighbourhood forums, even if this support goes little beyond meeting the 2011 Act duties to determine designation applications and administer the final stages of a neighbourhood plan.

This 'duty of support' was neither quantified nor defined further in the 2011 Act. Financial support from the LPA is specifically excluded as a requirement placed on LPAs (but can be provided if the authority so chooses). Central government since 2012 has continued to run a programme of financial support and technical advice to neighbourhood forums and parish councils preparing neighbourhood plans.

Emerging custom and practice over the past six years has led to the 2018 edition of the widely used *Locality Roadmap*⁶ providing a generic list of forms of assistance that a neighbourhood forum might reasonably expect to receive from its LPA. This reads as below (along with the extra LPA task of screening a draft NP to establish whether a Strategic Environmental Assessment (SEA) is needed).

making available data or relevant technical reports for the evidence base;

⁵ The 'duty of support' is at Schedule 4B(3) of the 2011 Localism Act and requires LPAs to give such advice or assistance to qualifying bodies as, in all the circumstances, they consider appropriate for the purpose of, or in connection with, facilitating the making of proposals for neighbourhood development orders in relation to neighbourhood areas within their area.

⁶ Neighbourhood Plans Roadmap – a Step by Step Guide, published by Locality March 2018

- arranging meetings, as appropriate, with the neighbourhood planning group;
- highlighting national policies which will need to be considered;
- providing advice on the legal requirements for neighbourhood planning under the Town and Country Planning Act 1990 (as amended by the Localism Act);
- providing advice on general planning matters;
- sharing information on key contacts and stakeholders;
- making available venues and helping to arrange community engagement activities, to avoid consultation overload and maximise efficiencies of resources; checking the plan prior to formal submission (for example by development management and policy teams);
- participation in meetings of the neighbourhood planning body or its working groups;
- providing advice on who needs to be consulted, especially in order to help the draft proposals meet the basic conditions (such as compatibility with EU obligations);
- providing support, such as assistance in laying out and illustrating a plan;
- providing members for steering/working groups

Our understanding of Government's intent behind Section 6 of the NPA 2017 is that all LPAs should make clear to their residents which of these forms of 'advice and assistance' (and any others) will be offered to emerging and designated neighbourhood forums. The requirement that this information be provided in a SCI, rather than in other forms of guidance, derives presumably from the fact that the SCI is a statutory document, the content of which can be prescribed. It also means that the public can expect to find all relevant information in one place — within a named publication that they can readily search for on an authority's website.

This would seem a reasonable means of raising citizen awareness of neighbourhood planning and of helping residents and community groups embarking on the process. Nevertheless, the limits of legislative action to address negative attitudes to neighbourhood planning were foreseen by some when the Neighbourhood Planning Bill was first introduced in the Commons. Neil Homer, Director at consultancy ONeill Homer, commented at the time that the new measures on SCIs "would not necessarily encourage local authorities to offer more support for local groups. The problems with most local planning authorities that do not offer the kind of support the government would like are deeply cultural, and no legal stick is going to change that overnight"

The second part of Section 6 requires an authority to explain in its SCI how it will go about the streamlined process of modifying a 'made' neighbourhood plan - a new process introduced via the 2017 Act. This is a scenario which has not yet arisen in London but is likely to do so in the near future. Three neighbourhood forums with 'made' plans have already been through the process of re-designation after the forum's initial five year term⁸. The pace of change in London's planning context is such that the first few 'made' neighbourhood plans will soon need review and updating.

Section 6 of the 2017 NPA came into force on **July 31st 2018**, as a result of the Neighbourhood Planning Act 2017 (Commencement No. 3) Regulations 2018 published in January 2018.

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⁷ Quoted in article in Planning Resource 12 September 2016.

⁸ Highgate, Kentish Town, and St Quintin and Woodlands have been through the re-designation process, involving a 6 week public consultation by the LPA.

Those local planning authorities listed in the annexe to this paper as being 'non-compliant' with this statutory requirement may protest that it is early days yet, and that they will be getting round to reviewing and updating their SCIs shortly. Yet the Neighbourhood Planning Bill including these provisions has been public since September 2016 and was enacted 18 months ago in April 2017. These new SCI requirements were commented on in the professional press at the time and are not an unexpected bolt from the blue. July 31st is now well passed.

London's LPAs could have easily made clear on their neighbourhood planning web pages their intentions for updating their SCIs, or spelt out the range of 'advice and assistance' offered to neighbourhood forums that would be included in a refreshed SCI.

Lambeth appears to be the only London LPA which has recognised the need to comply with new legislation. It adopted in August 2018 an 8 page addendum to its SCI, with the information needed to meet both the new requirements in Section 6 of the 2017 NPA. This cannot have been a hugely difficult or costly exercise.

As recognised in the survey results, there are a few London planning authorities which publish some helpful information on the 'advice and assistance' that they will provide (going beyond the set of statutory duties that LPAs have to undertake in processing a neighbourhood plan to its referendum). This material is in separate guidance documents or on web pages. Importing it across to a revised SCI publication would not be difficult.

This group is a small one of **Brent**, **Camden**, and **Hammersmith & Fulham** (the latter having only recently designated its first neighbourhood forum after refusing two earlier applications).

Harrow and **Haringey** can be added to this group in that they begin to set out a 'policy' towards the advice and assistance they will offer. Both use near identical wording in proposing to "set up a steering group to co-ordinate the fulfilment of its functions in relation to the establishment of any neighbourhood forum and the preparation of any neighbourhood plan. This will involve a ward Councillor, and relevant Council officers who will liaise with the forum, and advise on the extent of the neighbourhood plan area and matters of conformity with the Borough's Local Plan."

Whether an emerging neighbourhood forum would see this as an ideal form of support or 'advice and assistance' or as a potential intrusion on their own NP preparation is debatable. Only one forum has so far been designated within these two boroughs

Some of the Boroughs 'reluctant' or 'antipathetic' towards neighbourhood plans might contend that they have begun to comply with the Section 6 requirements, in that they explain what forms of support they will *not* provide. They also give their views on the obstacles and challenges involved in the neighbourhood planning process. It is hard to view the lengthy 'neighbourhood planning protocols' published by **Kingston upon Thames** and by **Richmond** as representing 'policies on advice and assistance'. The documents are couched in largely negative terms.

Kingston's protocol pre-empts the determination of individual designation applications by saying that the council "will not support small-scale or street level Neighbourhood Areas". Grounds for refusal of a designation application cannot rely on such a blanket approach. **Richmond's** protocol advocates the model of its own 'village plans' as an alternative to neighbourhood plans.

The City of London is more blunt. Its SCI states "The City Corporation will meet the minimum requirements as set out in regulations in regard to consultations on establishing a Neighbourhood Forum and preparation of a Neighbourhood Plan". Does this latter statement adequately 'set out the local planning authority's policies for giving advice or assistance' as required by Section 6?

A further group of Boroughs have reviewed and re-published their SCIs during 2017 (Barnet, Haringey, Islington, Tower Hamlets, OPDC) or are in the process of consulting on new versions (Walthamstow and Croydon). In none of these cases has the opportunity been taken to incorporate substantive material on 'advice and assistance' to neighbourhood forums, or to try to meet both the requirements of Section 6 of the NPA 2017.

Why is this so? The time gap between enactment of primary legislation, and the bringing into force of specific provisions though the mechanism of Commencement Orders, does not help matters. But can all London planning authorities (apart from Lambeth) have simply forgotten to organise the implementation of a new piece of legislation?

In choosing to badge the 2017 legislation as a 'Neighbourhood Planning Act' the Government gave a clear signal that a planning process for which local government has various statutory responsibilities was to see some changes. These new measures were commented on in the professional press. Do SCIs occupy so lowly a status in the minds of planning officers that a relatively simple task of updating the document (or publishing online an addendum or intention to update) remains permanently at the bottom of the in-tray?

Or is the explanation that a majority of London planning departments do not wish to spell out to the public the 'advice and assistance' on offer to neighbourhood forums, and choose to ignore the legislation? As our previous survey on Local Plans showed, nearly all London LPAs have been similarly inclined to ignore the 2011 Act requirement to distinguish between 'strategic' and 'non-strategic' policies when drafting Local Plans⁹.

It seems clear that antipathy towards neighbourhood planning remains widespread within London's public sector planning profession, with some honourable exceptions. By comparison, many district councils actively promote and assist the preparation of neighbourhood plans by parish councils, including addressing major issues such as the pressure from housing development in the absence of an up to date Local Plan.

UPDATING STATEMENTS OF COMMUNITY INVOLVEMENT – new requirements

When drafting new clauses of the Neighbourhood Planning Act, civil servants at DCLG/MHCLG were aware that SCIs were in many authorities becoming seriously out of date. The Technical Consultation on measures in the Bill commented that "Initial research shows that around a quarter of local planning authorities' statements of community involvement were last updated before 2012,

⁹ This distinction is important for neighbourhood plans, as it is key the application of the 'general conformity' test which forms one of the main 'basic conditions' for a lawful NP. Not making the distinction causes problems for those preparing NPs, and for the independent Examiners who review them.

prior to the current regulations on preparing Local Plans."¹⁰ Two years later, this percentage figure for London LPAs remains not very different (7 out of 35 LPAs or 20%).

As a consequence, the Neighbourhood Planning Act 2017 included a provision allowing the Secretary of State to introduce time limits for review of Local Plans and SCIs. These limits (five years in each case) came into effect via Regulations¹¹ published in December 2017 which states:

10A.—(1) A local planning authority must review a local development document within the following time periods—

- (a) in respect of a local plan, the review must be completed every five years, starting from the date of adoption of the local plan, in accordance with section 23 of the Act (adoption of local development documents);
- (b) in respect of a statement of community involvement, the review must be completed every five years, starting from the date of adoption of the statement of community involvement, in accordance with section 23 of the Act."

Part b) of this requirement seems to have passed unnoticed by many London planning authorities. This is despite the fact that a MHCLG letter to Chief Planning Officers on 21 December 2017 alerted all planning authorities to the forthcoming change. MHCLG's then Chief Planner advised: "The regulations introduce a requirement to review Local Plans/ Statements of Community Involvement at least every 5 years from adoption." The letter went on to say "The regulations also require authorities to set out in their Statements of Community Involvement their policies for giving advice or assistance to neighbourhood planning groups and their policies involving communities and other interested parties in the preliminary stages of plan-making: specifically in the exercise of their functions under sections 13 (survey) and 15 (Local Development Scheme) of the Planning and Compulsory Purchase Act 2004."

In terms of raising awareness of these new measures, MHCLG may not have helped itself by the fact that although current National Planning Practice Guidance (NPPG) mentions SCIs at various points, the guidance does not include a separate paragraph explaining the intent of these publications or the new requirements for their content and regular updating.

The same applies to NPPG paragraph 021 in the section on neighbourhood planning. This summarises "the role of the local authority in neighbourhood planning" and refers to the statutory 'duty of support'. It says nothing more about expectations on 'advice and assistance' or the new requirements to cover this subject in SCIs. This seems a missed opportunity, given that the text of NPPG paragraphs is frequently updated as an online resource.

CONCLUSIONS

The Government's aims of using SCIs as a vehicle for awareness-raising and giving clarity to the public on the 'duty of support' have not yet been met in London. Only one London planning authority complies with the requirements of the 2017 Neighbourhood Planning Act. This situation seems unlikely to change without some further interventions. Our recommendations are below.

¹⁰ Technical consultation on implementation of neighbourhood planning provisions in the Neighbourhood Planning Bill DCLG September 2016.

¹¹ Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017,

Overall, the evidence from this latest survey reinforces previous findings that many London planning authorities remain unenthused about the potential of the neighbourhood planning framework. With some notable exceptions, London's planning departments are ignoring (either knowingly or as a result of competing work pressures) steps that Government has taken to underpin and strengthen the neighbourhood planning process. The 2017 Neighbourhood Planning Act demonstrated a continuing level of cross-party support for this very localised form of community-led preparation of spatial plans.

Neighbourhood Planners.London will continue to act as a network which promotes the potential of neighbourhood planning, and its relevance and applicability to a global city as well as in more rural areas. This remains uphill work.

The authors of the new London Plan, as a result of our and other consultation responses, have now accepted that London has a three tier rather than two tier planning system. Other references to neighbourhood planning have been inserted in the draft text as 'modifications'. The Examination in Public of the London Plan will be the next forum at which the contribution and future potential of neighbourhood planning in London can be impressed upon the Mayor of London and the two Deputy Mayors for Housing and for Regeneration.

In the meantime, Neighbourhood Planners.London will continue to support the many hundreds of residents, local businesses and other across the capital who are spending time and energy in preparing plans within their own neighbourhoods — with a level of persistence and commitment that can overcome the delays and obstacles that are too often thrown in their path.

RECOMMENDATIONS

- 1. MHCLG updates relevant paragraphs of National Planning Practice Guidance to include the requirement for 5 yearly reviews of Statements of Community Involvement, and the addition to their content of 'policies for advice and assistance' on neighbourhood planning and on arrangements for the modification of neighbourhood plans.
- 2. London planning authorities take urgent steps to bring their SCIs into line with these requirements, particularly in cases where SCIs have not been updated since 2006-8
- 3. Without reviving a requirement for full-scale examination of SCIs, Planning Inspectors are asked to check on timeliness of their review and quality of content as part of the test of soundness when examining Local Plans.
- 4. Neighbourhood Planners.London writes to the Monitoring Officers of all those London planning authorities which have failed to a) update their SCIs within the last 5 years and/or b) failed to include in their SCI the content required by Section 6 of the Neighbourhood Planning Act 2017, reminding them that this is information which the public should be able to access readily and without further delay.
- 5. Neighbourhood Planners.London gathers further information on the types of 'advice and assistance' that is being offered by London LPAs under the 'duty of support' so as to establish a baseline measure of what emerging and designated neighbourhood forums can expect.

ANNEX

LOCAL PLANNING	STATEMENT OF COMMUNITY INVOLVEMENT
AUTHORITY (BOROUGH OR MAYORAL DEVELOPMENT CORPORATION)	LEVEL OF COMPLIANCE WITH REQUIREMENTS OF 2017 NEIGHBOURHOOD PLANNING ACT
	LB Barking and Dagenham's SCI dates from 2015 and makes no mention of neighbourhood planning. There is no sign on the Council's website of any review or updating to take account of 2017 Neighbourhood Planning Act requirements, nor is there a website page on neighbourhood planning.
	Barking and Dagenham has not yet designated any neighbourhood areas.
Barking and Dagenham	LB Barking and Dagenham's SCI is non-compliant with Section 6 of the NPA 2017.
	LB Barnet published a revised draft SCI published June 2018. This is a 37 page document including a 3 page section on neighbourhood planning. Paragraph 9.4.1 is inaccurate in stating that NPs "must comply with the Local Plan" rather than "must generally conform with the strategic policies" in the Local Plan.
	Section 10 of the SCI document provides a table setting out the stages of NP preparation, including the statutory duties to be carried out by the LPA. It does not go beyond this to explain "the local planning authority's policies for giving advice or assistance" in the making of neighbourhood plans, or the modification of made plans, as required by Section 6 the 2017 NPA.
	LB Barnet has designated two neighbourhood areas (Mill Hill 2014, and West Finchley 2015).
Barnet	LB Barnet's SCI is non-compliant with Section 6 of the NPA 2017.
	LB Bexley's SCI dates from 2006, with a short addendum published in 2009. These predate the 2011 Localism Act and 2017 NPA, and hence make no mention on neighbourhood planning. There appears to be no web page on neighbourhood planning, or separate guidance document or protocol explaining the local authority's policies for 'advice and assistance'.
	Bexley has designated one neighbourhood area and forum (Hill View 2015).
Bexley	LB Bexley's LPA is non-compliant with Section 6 of the NPA 2017
	LB Brent's SCI was reviewed and republished in 2017
Brent	The SCI is a 42 page document which includes a 5 page section on neighbourhood planning. This includes a schedule showing 'council responsibilities' and 'forum responsibilities'. This covers the basic statutory duties of a LPA in relation to neighbourhood planning but does not go beyond this to explain "policies for giving"

	advice and assistance". Nor does it cover "advice or assistance on proposals for modification of neighbourhood development plans".
	Brent publishes a separate 'neighbourhood planning protocol' which gives fuller information on the respective roles of the local planning authority and the neighbourhood forum. Incorporation of this material into an updated SCI would go further towards meeting the Section 6 requirements.
	Brent has one 'made' neighbourhood plan at Sudbury Town, and has designated 3 further neighbourhood areas. These are Harlesden (jointly with OPDC) for which a NP is at final consultation stage, Unity (Church End and Roundwood) in 2013 and a joint designation in 2016 with Camden of the Kilburn neighbourhood area.
	LB Brent's SCI is non-compliant with Section 6 of the NPA 2017 but could get closer to compliance by incorporation of material in what is currently a separate protocol.
	LB Bromley updated and republished its SCI in 2016. Neighbourhood planning is covered in three short paragraphs and the information given is not fully accurate (the document omits the important qualification <i>general</i> conformity from its explanation of the 'general conformity' Basic Condition). There is no neighbourhood planning page on the council's website, and no sign of further information on 'advice and assistance' offered to neighbourhood forums.
	Bromley has not yet designated any neighbourhood areas or forums
Bromley	LB Bromley's SCI is non-compliant with Section 6 of the NPA 2017.
	LB Camden updated and republished its SCI in 2016. Neighbourhood planning is covered by a 3 page section with a schedule that sets out the responsibilities of the Council and a neighbourhood forum.
	The council publishes a separate <i>Guide to Preparing Neighbourhood Plans in Camden</i> . This includes a section on 'Council Support'. A set of FAQs is also published.
	Camden has designated neighbourhood areas and forums:
	Kilburn (jointly with LB Brent 2016)
	Mount Pleasant (jointly with LB Islington 2016)
	Highgate (NP 'made' 2017 Forum redesignated 2018)
	Kentish Town (NP 'made' 2016 Forum redesignated 2018)
	Fortune Green and West Hampstead (NP 'made' 2015)
Camden	Somers Town (2013)

	Dartmouth Park (2013)
	Camley Street (2014)
	Fitzrovia East (2014)
	Church Row and Perrins Walk (2014)
	Redington and Frognal (2014)
	Hampstead (2014, referendum held 2018)
	LB Camden's SCI is non-compliant with Section 6 of the NPA 2017 but could get closer by incorporation of material in what are currently a separate guidance document and protocol. The LPAs handling of modifications to a 'made' plan also need to be addressed.
	The Corporation's SCI was updated in 2016 and covers neighbourhood planning in two brief paragraphs, the first of which states "The City Corporation will meet the minimum requirements as set out in regulations in regard to consultations on establishing a Neighbourhood Forum and preparation of a Neighbourhood Plan". There is no explanation that neighbourhood plans when adopted form part of the development plan.
	A web page on neighbourhood planning gives a brief explanation of the process and states "A neighbourhood plan should focus on local matters and should be in general conformity with national policy and with the City's Local Plan." This is an abbreviated and inadequate explanation of the 'general conformity' requirement.
	City of London has not yet designated any neighbourhood areas or forums.
City of London	City of London's SCI is non-compliant with Section 6 of the NPA 2017 (unless the above statement on meeting minimum requirements is accepted as an explanation of the local planning authority's policies for giving advice or assistance in the preparation of neighbourhood plans).
	LB Croydon is currently consulting on an updated SCI document (published August 2017). This covers neighbourhood planning in one paragraph, providing links to neighbourhood planning pages on the council's website. These pages refer to the 2011 Localism Act and Neighbourhood Planning Regulations. They make no mention of the 2017 NPA, nor the requirements relating to SCIs introduced via Section 6 of that Act.
	Croydon publishes a one page online guide on the support that it will provide to neighbourhood forums. This focuses on the statutory duties involved.
	LB Croydon has not yet designated any neighbourhood areas.
Croydon	It looks as though LB Croydon's updated SCI will be non-compliant with Section 6 of the NPA 2017, unless the authority takes steps to add additional content to the

	current draft.
	LB Ealing's SCI was updated in 2015. It is a 59 page document with 2 pages on neighbourhood planning. Their content is inaccurate in stating that "A neighbourhood plan would have to follow a similar process to that carried out by the Council for a Local Plan including public consultation and Examination in Public" (EIPs and the requirement for 'soundness' do not apply to neighbourhood plans. Public hearings are held by an Examiner at his/her discretion and are not the norm). No additional guidance documents or protocols on neighbourhood planning appear to be published.
	LB Ealing has two neighbourhood plans which have been successful at referendum and now form part of the development plan (Central Ealing 2017, and West Ealing Centre 2018). A further area and forum has been designated (Central Acton).
Ealing	LB Ealing's SCI is non-compliant with Section 6 of the NPA 2017.
	LB Enfield's SCI was updated in 2015. It is a 44 page document with two paragraphs on neighbourhood planning. Their content is inaccurate in stating that "A neighbourhood plan would have to follow a similar process to that carried out by the Council for a Local Plan including public consultation and Examination in Public" (As above, EIPs and the requirement for 'soundness' do not apply to neighbourhood plans).
	Enfield has designated the Hadley Wood Neighbourhood Forum (2015) along with a neighbourhood area the boundary of which was varied by the Council. An application for Station Mews was not progressed, and one for Edmonton Angel approved in 2016.
Enfield	LB Enfield's SCI is non-compliant with Section 6 of the NPA 2017.
	LB Greenwich updated its SCI in 2016. The 22 page document includes a one page section on neighbourhood planning. Elsewhere (paragraph 2.6) it acknowledges the 'duty to support' in stating "The Royal Borough has a statutory duty to support those communities which wish to carry out neighbourhood planning, through the provision of advice and assistance, the completion of statutory 'periods for representations', as well as the holding of the examination and referendum stages of neighbourhood plan production." No separate documents or protocols on neighbourhood planning appear to be published.
	LB Greenwich has designated the Lee neighbourhood area (cross boundary) in 2016 and refused a 2015 cross-boundary application for a Deptford neighbourhood area.
Greenwich	Greenwich's SCI is non-compliant with Section 6 of the NPA 2017
Hackney	LB Hackney's 2014 SCI contains a brief section on neighbourhood planning. This does not explain the 'advice and assistance' that the Council offers to

neighbourhood forums. The Council has a neighbourhood planning web page but does not appear to publish other guidance documents or protocols. Hackney has made the following designations Chatsworth Road area and forum (2013) Queen Elizabeth and Lordship Lane area (2015) East Shoreditch (area designated jointly with Tower Hamlets) Stamford Hill (varied area designated 2013) A Finsbury Park and Stroud Green application (covering parts of Hackney, Islington and Haringey is under consideration. LB Hackney has refused a number of other area and forum designation applications. Hackney's SCI is non-compliant with Section 6 of the NPA 2017. LB Hammersmith & Fulham updated and republished its SCI in 2015. The 49 page document includes a 4 page section on neighbourhood planning. This states that a neighbourhood plan must "be in compliance with the council's Development Plan." This is inaccurate in explaining the important 'general conformity' requirement. The SCI includes a table at 3.19 which set out "ways in which the council will assist in supporting the development of a neighbourhood plan". This goes some way towards meeting NPA 2017 Section 6 requirements. The Council also publishes a Guidance Note but this does not expand on non-statutory support that will be provided to neighbourhood forums. LB Hammersmith and Fulham has designated an (unnamed) neighbourhood area in response to a 2012 application, for which the forum was refused, for the crossboundary St Quintin and Woodlands neighbourhood. A second area, with a much varied boundary (Old Oak Estate) was designated in 2017 with the forum application refused. In July 2018 the Council designated the West Kensington and Gibbs Green Community Homes Neighbourhood Forum and Area. Hammersmith & Fulham's SCI is non-compliant with Section 6 of the NPA 2017. It does not address the question of modifications to a 'made' neighbourhood plan Hammersmith and and it is doubtful whether the requirement to explain policies on 'advice and **Fulham** assistance' is met. LB Haringey updated and adopted a revised SCI in 2017. This 34 page document includes a 2 page section on Localism and Neighbourhood Plans. In terms of the 'duty to support' the SCI states that "The Council will provide advice and assistance to the Forum steering group to co-ordinate the fulfilment of its functions in relation to the establishment of any neighbourhood forum and the preparation of any neighbourhood plan. This will involve a ward Councillor, and relevant Council Haringey officers who will liaise with the forum, and advise on the extent of the

	Limits on support are also made clear, with the document stating "Eurther
	Limits on support are also made clear, with the document stating "Further guidance on how to undertake consultations may be given by the Council, but the
	onus and costs (excluding the examination and referendum) will be borne by the
	forum."
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	LB Haringey jointly designated with LB Camden the Highgate neighbourhood area, for which the neighbourhood plan was made by both councils in 2017. The Crouch
	End area and forum were designated in 2015 and the Council is currently
	considering an application for a Finsbury Park and Stroud Green area and forum.
	LB Haringey's SCI is non-compliant with Section 6 of the NPA 2017. It does not
	address the question of modifications to a 'made' neighbourhood plan and it is
	doubtful whether the requirement to explain policies on 'advice and assistance' is
	met.
	LB Harrow's SCI dates from 2013. This 28 page document includes a 2 page section
	on Localism and Neighbourhood Plans. The content is similar to that of Haringey's
	SCI in stating "The Council will set up a steering group to co-ordinate the fulfilment
	of its functions in relation to the establishment of any neighbourhood forum and
	the preparation of any neighbourhood plan. This will involve a ward Councillor, and
	relevant Council officers who will liaise with the forum, and advise on the extent of
	the neighbourhood plan area and matters of conformity with the Borough's Local
	Plan."
	LB Harrow has not yet designated any neighbourhood areas.
	LB Harrow's SCI is non-compliant with the 2017 NPA Section 6 requirements. It
	does not address the question of modifications to a 'made' neighbourhood plan
	and it is doubtful whether the requirement to explain policies on 'advice and
Harrow	assistance' is met.
	LB Havering's SCI was adopted in 2015. The 32 page document contains one brief
	paragraph on neighbourhood planning. No information is provided on how the
	Council will approach the 'duty of support'. The SCI includes a brief paragraph on
	neighbourhood plans, without explaining that any adopted plan forms part of the
	development plan for the borough.
	LB Havering has not yet designated any neighbourhood areas.
	LB Havering's SCI is non-compliant with Section 6 of the NPA 2017. It is unusual in
	LB Havering's SCI is non-compliant with Section 6 of the NPA 2017. It is unusual in that the SCI also pays little or no heed to the statutory duties required of LPAs as
Havering	
Havering Hillingdon	that the SCI also pays little or no heed to the statutory duties required of LPAs as

	duty to co-operate) or the 2017 NPA.
	Hillingdon designated its first neighbourhood area and forum (Ickenham) in December 2016.
	LB Hillingdon's SCI is non-compliant with Section 6 of the NPA 2017 and also inadequate in explaining the neighbourhood planning framework in place since 2012.
	LB Hounslow's SCI dates from 2013 and states (paragraph 1.7) "Separate guidance will be prepared on the Localism Act's neighbourhood planning provisions". Apart from one brief paragraph, there is no mention of neighbourhood planning. There is a Hounslow web page on neighbourhood planning which includes the statement: "Hounslow Council will collaborate with communities interested in neighbourhood planning to provide appropriate types of support and may also provide technical and administrative assistance alongside fulfilling legislative and guidance requirements."
	There is no sign on the website of the 'separate guidance' promised in the SCI.
	Hounslow has designated 2 neighbourhood areas, at Butts Farm (2013) and a modified and reduced Osterley neighbourhood area (2016). No forum appears to have been designated for this latter area.
Hounslow	LB Hounslow's SCI is non-compliant with Section 6 of the NPA 2017.
	LB Islington's SCI has been updated in and republished in 2017. The 32 page document includes only 2 paragraphs on neighbourhood planning, but refers readers to separate guidance. This separate document (<i>A short guide to neighbourhood planning</i>) gives basic information on the process and links to further sources of guidance. It does not "set out the local planning authority's policies for giving advice or assistance" as required by the NPA 2017.
	Islington designated a Crouch End and Hornsey Rise neighbourhood area in 2015, for which no forum has been designated. Jointly with Camden, a Mount Pleasant neighbourhood area and forum was designated in 2016. An application for a Finsbury Park and Stroud Green neighbourhood area has been consulted on recently.
Islington	While updated recently, LB Islington's SCI remains non-compliant with Section 6 of the NPA 2017.
	RB Kensington and Chelsea's SCI is titled <i>Involving People in Planning</i> , and dates from December 2013. In a 52 page document, 8 pages cover neighbourhood planning. These explain the stages of the neighbourhood planning process but do not give information on the 'advice and assistance' that the authority will offer,
Kensington and Chelsea	Kensington and Chelsea has two 'made' neighbourhood plans (Norland (2014) and

	St Quintin and Woodlands (2018)) and has designated a third neighbourhood area
	(Courtfield 2017).
	RB Kensington and Chelsea's SCI is non-compliant with Section 6 of the NPA 2017,
	and will shortly fail to comply with the requirement for 5 yearly reviews.
	The SCI for RB Kingston dates from 2007 and predates the 2011 Localism Act. The
	council published in March 2017 separate Neighbourhood Planning Guidance. This
	73 page document is highly detailed, prescriptive as to processes for NP
	preparation and inaccurate on some issues (e.g. in stating "The law requires that
	you should make separate applications for designation as a Neighbourhood Forum
	and for the designation of your Neighbourhood Area").
	A separate <i>Neighbourhood Protocol</i> document is also published by Kingston. This
	gives details of how the Council will work with neighbourhood forums. It too
	contains some inaccuracies (e.g. in setting out the 'basic conditions' as including b)
	and c) on conservation/heritage when these apply only to Neighbourhood
	Development Orders and not to NPs). The Protocol also states that "Small-scale
	or street level Neighbourhood Areas will not be supported by Kingston Council due
	to very limited staff and financial resources, and the impact this would have on the
	determination of planning applications". The legal grounds for 'refusing' a
	designation application would not appear to allow for this type of blanket policy position based on staff constraints.
	position based on stan constraints.
	RB Kingston designated North Kingston neighbourhood area in March 2017 and
	the North Kingston Neighbourhood Forum in August 2017.
	As a SCI document, Kingston's is non-compliant in not covering Section 6 of the
	2017 NPA and in not having been reviewed and updated 5 years after adoption.
	Separate documents set out LPA policies for advice and assistance, but do not
	meet the Section 6 requirement to explain processes for modification of a made
Kingston upon Thames	NP.
	LB Lambeth's SCI was revised and re-published in 2015, alongside a new Local Plan.
	The 40 page document includes two brief paragraphs explaining the basics of
	neighbourhood planning.
	Lambeth designations to date are:
	• Horno Hill poighbourhood area (2017) with the conflication for the formula
	 Herne Hill neighbourhood area (2017) with the application for the forum refused.
	Norwood neighbourhood area and Norwood Planning Assembly (2017)
	 Tulse Hill neighbourhood area (varied from that applied for) and forum (2016)
Lambeth	Kennington Oval and Vauxhall neighbourhood area and Forum (2015).

	South Bank and Waterloo Neighbours area and Forum (2014)
	In August 2018 Lambeth adopted an <i>Addendum to</i> its SCI, to meet the requirements of the 2017 NPA. This 8 page document sets out how the council will
	provide advice and assistance to neighbourhood forums and also covers the
	process of modifying a 'made' neighbourhood plan. This document addresses
	both parts of the NPA 2017 Section 6 requirements.
	LD Lavrich and a CCL data a fire to 2000 and any data about a 2011 Lavrich and The
	LB Lewisham's SCI dates from 2006 and predates the 2011 Localism Act. The Council publishes a separate 4 page <i>Information Note</i> for residents. This includes a
	table summarising the authority's statutory role in neighbourhood planning, but
	this does not detail 'advice and assistance' offered to forums.
	LB Lewisham has designated 5 neighbourhood areas and forums:
	Crofton Park and Honor Oak Park (2014)
	• Grove Park (2014)
	Corbett Estate (2015)
	• Deptford (2016)
	• Lee (2016)
Lewisham	LB Lewisham's SCI is non-compliant with Section 6 of the 2017 NPA and fails to comply with the requirement for 5 yearly reviews.
	LB Merton's SCI dates from 2006 and predates the 2011 Localism Act. No web page or documents on neighbourhood planning appear to be published. A review of the SCI is promised as part of the current Local Plan review.
	LB Merton has not yet designated any neighbourhood areas
Merton	Merton's SCI is non-compliant with Section 6 of the 2017 NPA and fails to comply with the requirement for 5 yearly reviews.
	LB Newham's 2015 Statement of Community Involvement includes a single paragraph on neighbourhood planning. This is not wholly accurate, in stating that NPs require 'conformity' with the Local Plan and omitting the important qualification <i>general</i> conformity. A page of online advice states that NPs must be "in keeping" with the Local Plan, and does not explain 'general conformity' requirement.
	Newham has not yet designated any neighbourhood areas.
Newham	LB Newham's SCI is non-compliant with Section 6 of the NPA 2017.
	LB Redbridge's SCI from 2006, and predates the 2011 Localism Act. The Council
Redbridge	also publishes a 4 page set of FAQs on neighbourhood planning, which lists the
-	statutory functions that the authority will undertake and gives a few examples of

possible 'advice and assistance' without commitment to adhere to these. The Council's website publishes an (unfinished) web page referring to a designation application for a South Woodford area and forum. No dates are shown and it is not clear whether this application was progressed. LB Redbridge is non-compliant with Section 6 of the NPA 2017 and fails to comply with the requirement for a 5 yearly review of the SCI. LB Richmond's SCI dates from 2006, with addendums published made in 2009 and 2015. Neighbourhood planning is not mentioned in the 2015 addendum. The Council's website explains that the local authority has published 24 'village plans' and "In view of this, we encourage community groups to carefully consider what else a neighbourhood development plan could beneficially achieve for their area before starting a formal neighbourhood planning process". An 18 page Neighbourhood Planning Protocol (February 2014) explains perceived obstacles and demands involved in NP preparation and includes some inaccuracies (e.g. in stating "There is a legal requirement to carry out a Strategic Environmental Assessment"). LB Richmond has designated one neighbourhood area (Ham and Petersham). The Ham and Petersham NP passed its referendum in October 2018. LB Richmond's SCI is non-compliant with Section 6 of the NPA 2017 and its SCI has **Richmond upon Thames** not been substantively reviewed within a five year period since adoption. LB Southwark's SCI dates from 2008 and predates the 2011 Localism Act. The Council published on its website a 2015 Cabinet report dealing with internal processes for making decisions on designation applications within statutory timescales. No specific information on the 'duty to support' or what the Council offers by why of 'advice and assistance' to neighbourhood forums appears to be published. LB Southwark has designated 5 neighbourhood areas. Bankside Neighbourhood Area and Business Area (May 2013, with a varied area) and the Forum. Bankside Forum designated June 2013 Bermondsey Area A designated in 2014 and Bermondsey Village Neighbourhood Forum 2015 South Bank and Waterloo area and Forum (jointly with Lambeth) in 2014 Walworth neighbourhood area and Forum in 2016 Herne Hill neighbourhood area and Forum in 2017 (jointly with Lambeth). Southwark

	LB Southwark's SCI is non-compliant with Section 6 of the NPA 2017 and fails to comply with the requirement for a 5 yearly review of the SCI.
	LB Sutton's SCI dates from 2014. The 42 page document includes a 4 page section on neighbourhood planning. This explains the consultation processes that the council will undertake as part of neighbourhood plan preparation but does not otherwise give information on 'advice and assistance' to a neighbourhood forum. LB Sutton has designated three neighbourhood areas:
	Hackbridge and Beddington Corner (2012) with a NP at Examination stage
	Beddington North (2013)
	Belmont and East Cheam (2016).
	The Council does not appear to publish further guidance documents or protocols explaining how it provides 'advice and assistance' to neighbourhood forum.
Sutton	LB Sutton's SCI is non-compliant with Section 6 of the NPA 2017.
	The SCI for Tower Hamlets was updated in republished in 2017. It does not refer to the 2017 NPA Section 6 requirements. In terms of 'advice and assistance' the document, states briefly "The Council is proactive in providing information about Neighbourhood Planning and will provide support in setting up Neighbourhood Forums and preparing a Neighbourhood Plan. The Council will also support forums set up neighbourhood plans by, amongst other things, ensuring that the proposed plans are in conformity with the Local Plan and that the due processes have been followed in accordance with the Localism Act."
	A 4 page schedule in the SCI sets out "what the council has to do by law" in relation to neighbourhood planning. No further information on 'advice and assistance' is offered in the document. No information is provided on how modifications of 'made' NPs will be handled
	LB Tower Hamlets has designated 7 neighbourhood areas
	Wapping (varied area designated 2013). Forum designation refused.
	East Shoreditch (area and forum approved 2014)
	Limehouse (area and forum designated 2015)
	 Isle of Dogs (area and forum approved 2016. NP not progressed to referendum on recommendation of the Examiner June 2018.
	Spitalfields (area and forum designated 2016)
	Roman Road Bow (area and forum designated 2017)
Tower Hamlets	Poplar (area designated 2018, forum designation under consultation)

	The SCI for Tower Hamlets is non-compliant with Section 6 of the NPA 2017.
	LB Waltham Forest's SCI has recently been reviewed and updated. A revised draft is out for consultation from September 10 th .
	The Council's website carries a statement "The Council is encouraging the preparation of neighbourhood plans as 'Community Plans'. When prepared these will be adopted as a Supplementary Planning Document without necessarily proceeding through the formal stages of independent examination and a referendum." A local planning authority is required to progress a draft NP to examination and subsequent referendum, unless it fails to meet the relevant statutory requirements at each stage. A SPD cannot create new policy, so has an inferior status to a neighbourhood plan. A LPA is not in a position to dictate to a neighbourhood forum that a NP should be adopted as a SPD.
Waltham Forest	LB Waltham Forest has designated one neighbourhood area (Highams Park in 2014).
	LB Wandsworth's SCI dates from 2012. It includes two paragraphs explaining the basics of neighbourhood planning (inaccurate in omitting the important qualification 'general' when referring to the 'general conformity' requirement. The Council appears not to publish separate guidance documents or protocols on neighbourhood planning. The council has designated one neighbourhood area and forum (Tooting Bec and Broadway) in 2017.
Wandsworth	LB Wandsworth's SCI is non-compliant with Section 6 of the NPA 2017 and its SCI has not been reviewed within a five year period since adoption.

City of Westminster's SCI was last updated in 2014. The document includes 6 pages on neighbourhood planning and explains in detail how the council will handle its statutory duties in relation to neighbourhood planning. Beyond these duties, the document does not expand on the 'advice and assistance' it will offer as part of the 'duty of support'. No information is provided on how modifications of 'made' NPs will be handled

Westminster has 16 designated forums and one Community Council (Queens Park) with powers to prepare a NP. The forums and neighbourhood areas are:

- Belgravia (2014)
- Church Street Ward (2014)
- Churchill Gardens (2015)
- Fitzrovia (West) (2015)
- Hyde Park and Paddington (2018)
- Knightsbridge (2015) successful referendum October 2018
- Maida Hill (2015)
- Marylebone (2015)
- Mayfair (2014) Draft NP submitted May 2017
- Notting Hill East (2014)
- Pimlico (2015)
- Soho (2014)
- St. James's (2015)
- St. John's Wood (2014)
- Victoria (2015)
- Westbourne (2014)

City of Westminster's SCI is non-compliant with Section 6 of the NPA 2017 albeit that the council has designated more neighbourhood areas than any other London Borough. Progress towards 'made' neighbourhood plans has proved slower than in other parts of London.

City of Westminster

The London Legacy Development Corporation's SCI dates from March 2013. The document includes half a page on neighbourhood planning. This refers to support offered in stating "The Legacy Corporation will support communities in the preparation of Neighbourhood Plans by helping to define the geographical scope of neighbourhoods, providing advice on the preparation of the plans throughout their key stages and validating plans to ensure that they meet all the necessary

	requirements."
London Legacy Development Corporation	The Corporation does not appear to publish further documents or guidance on the 'advice and assistance' it offers to neighbourhood forums. One neighbourhood area and forum has been designated by the LLDC (Greater Carpenters). A draft NP was consulted on at pre-submission stage in late 2017. The London Legacy Development Corporation's SCI is non-compliant with Section 6 of the NPA 2017, and five years has recently passed since it was last reviewed.
	The Old Oak and Park Royal Development Corporation's SCI was updated and republished in February 2017. The 22 page document includes a page and a half on neighbourhood planning. This gives details on how the Corporation will undertake its statutory duties, but beyond this does not explain what further 'advice and assistance' is on offer. No information is provided on how modifications of 'made' NPs will be handled
Old Oak and Park Royal Development Corporation	OPDC has designated a cross-boundary Harlesden neighbourhood area (2015, jointly with LB Brent) and an Old Oak neighbourhood area (2017) with a varied boundary. The Old Oak Neighbourhood Forum was designated in 2018. The Old Oak and Park Royal Development Corporation's SCI is non-compliant with
	Section 6 of the NPA 2017.

Neighbourhood Planners.London

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

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



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