



The Work and Impact of Neighbourhood Development Plans post-adoption

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Abstract

Neighbourhood planning was introduced as a new level of participatory neighbourhood-scale planning in England under the 2011 Localism Act. Most of previous studies have focused on mainly the emergence of neighbourhood planning and the preparation of neighbourhood development plans. There are no in-depth academic accounts of neighbourhood development plans 'post-adoption', whilst development plans in England have considerable and practical power to influence and shape the growth of the real world. This thesis aims to identify and explore the work and impact of neighbourhood development plans after their adoption based on empirical evidence, tracing how the neighbourhood development plans are used within the planning system and contexts. To do this, multiple embedded case study design with the mixed quantitative and qualitative methods is employed for scrutinising four selected neighbourhood development plans.

This thesis deploys and reworks the concept of the communicative work of development plans proposed by Healey (1993) as a conceptual and theoretical tool. This concept is extended to understand the nature and influence of a development plan within its continuing and interactive contexts and further reproduced by reflecting and adjusting to the particularities and attributes of neighbourhood development plans as a relatively new form of community-led plans. The findings highlight that neighbourhood development plans and neighbourhood planning groups themselves seek to remain actively involved in post-adoption planning processes, interacting constantly but sometimes in quite different ways with their external planning environments. The research provides deeper insight into the work of neighbourhood development plans and their interactive power and influence. In turn this insight can provide practical guidelines for those who produce or revise neighbourhood plans and those who support them.

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Contents

1. Introduction	1
1.1 Introduction	1
1.2 Context and background.....	1
1.3 Research aim, objectives and questions.....	4
1.4 Contribution to Knowledge.....	5
1.5 The structure of the thesis.....	6
2. Neighbourhood development plans in English planning system	8
2.1 Introduction	8
2.2 Localism, planning reform, and neighbourhood planning within English Planning System.....	9
2.3 Neighbourhood Planning for Neighbourhood Development Plans.....	12
2.4 Outcomes of Neighbourhood development plans	25
2.5 Summary.....	29
3 The role of the plan after plan preparation: a conceptual framework.....	31
3.1 Introduction	31
3.2 The role and nature of plans in planning.....	31
3.3 Communicative work of development plans.....	35
3.4 Communicative work of neighbourhood development plans.....	36
3.4.1 Interaction between local plans and neighbourhood development plans.....	40
3.4.2 Work of neighbourhood development plans in decision-making	41
3.4.3 Work of neighbourhood planning groups post-approval	42
3.5 Summary.....	46
4. Methodology and Methods	47
4.1 Introduction	47
4.2 Overall approach.....	47
4.3 Research design	48
4.3.1 Case study research	49
4.3.2 Selection of cases.....	51
4.4 Research methods	56
4.4.1 Data collection	56
4.4.2 Data analysis	61
4.4.3 Limitations of research methods conducted	64

4.5 Ethics statement and positionality	64
4.6 Summary	66
5 Neighbourhood Plans of Camden in London.....	68
5.1 Introduction	68
5.2 Context of London.....	69
5.3 Context of Camden	72
5.4 Kentish Town Neighbourhood Plan	75
5.4.1 Background and motivations	75
5.4.2 Preparation and adoption of the neighbourhood plan	77
5.4.3 Overview of content and aims of the neighbourhood plan.....	80
5.4.4 Interaction with the Local Plan	83
5.4.5 Role of the neighbourhood development plan in decision-making	91
5.4.6 Role of the neighbourhood forum post-approval.....	105
5.5 Hampstead Neighbourhood Plan.....	107
5.5.1 Background and motivations	107
5.5.2 Preparation and adoption of the neighbourhood plan	109
5.5.3 Overview of content and aims of the neighbourhood plan.....	115
5.5.4 Interaction with the Local Plan	120
5.5.5 Role of the neighbourhood development plan in decision-making	123
5.5.6 Role of the neighbourhood forum post-approval.....	135
5.6 Summary	143
6 Neighbourhood Plans of Milton Keynes	149
6.1 Introduction	149
6.2 Context of Milton Keynes.....	149
6.3 Olney Town Neighbourhood Plan.....	154
6.3.1 Background and motivations	154
6.3.2 Preparation and adoption of the neighbourhood plan	156
6.3.3 Overview of content and aims of the neighbourhood plan.....	159
6.3.4 Interaction with the Local Plan	167
6.3.5 Role of the neighbourhood development plan in decision-making	172
6.3.6 Role of the Neighbourhood Plan Steering Group post-approval.....	192
6.4 Newport Pagnell Neighbourhood Plan	196
6.4.1 Background and motivations	196
6.4.2 Preparation and adoption of the neighbourhood plan	198

6.4.3 Overview of content and aims of the neighbourhood plan.....	201
6.4.4 Interaction with the Local Plan	207
6.4.5 Role of the neighbourhood development plan in decision-making	210
6.4.6 Role of the Neighbourhood Plan Steering Group post-approval.....	229
6.5 Summary	233
7 Discussion	236
7.1 Introduction	236
7.2 Roles of Neighbourhood development plans post-adoption	236
7.3 The Communicative work of neighbourhood plans in implementation.....	242
7.4 Summary	253
8 Conclusion.....	255
8.1 Introduction	255
8.2 Returning to the research questions	255
8.3 Limitations of the research	259
8.4 Contributions to knowledge	260
8.5 Implications for theory and practice.....	263
8.6 Future research and conclusion.....	264
References	266
Appendices	282
Abbreviations	286

List of Figures

Figure 1 Multiple embedded case study design	50
Figure 2 Camden neighbourhood planning map - August 2021	73
Figure 3 Kentish Town Neighbourhood Plan Area (KTNP, 2016, p. 4)	76
Figure 4 Policy SP2: Kentish Town Potential Development Area (KTPDA) (KTNP, 2016, p. 45)	87
Figure 5 Kentish Town Regis Road - Growth and spatial strategy (Camden Local Plan, 2017, p. 4)	88
Figure 6 Development areas of Kentish Town Planning Framework (KTPF, 2020, p. 4).....	89
Figure 7 Citation of the Kentish Town Neighbourhood Plan in decision-making.....	94
Figure 8 Citation of policies of Kentish Town Neighbourhood Plan in decision-making	96
Figure 9 Policy SSP1: Car wash site map (KTNP, 2016, p. 49)	97
Figure 10 Map of Conservation areas within Hampstead Neighbourhood Plan Area (HNP 2018, p. 15)	113
Figure 11 . Hampstead Neighbourhood Plan Area (grey area excluded) (HNP 2018, p. 10)	114
Figure 12 Map of Character areas within Hampstead Neighbourhood Plan Area (HNP 2018, p. 15)	117
Figure 13 Citation of the Hampstead Neighbourhood Plan in decision-making	127
Figure 14 Citation of policies of the Hampstead Neighbourhood Plan in decision-making	128
Figure 15 . Site map of 2019/2375/P - Abacus Belsize Primary School Design and Access Statement (2019, p. 6)	130
Figure 16 Map of Milton Keynes.....	150
Figure 17 Map of Milton Keynes: Newport Pagnell and Olney.....	151
Figure 18. Proposals map of Olney Town Neighbourhood Plan	160
Figure 19. Objective and policy for transport in Olney Town Neighbourhood Plan.....	166
Figure 20. Proposals Map of Olney Town Neighbourhood Plan 2017	170
Figure 21. Policies Map of Plan:MK 2019	171
Figure 22 Citation of Olney Town Neighbourhood Plan in decision-making.....	176
Figure 23 Citation of policies of Olney Town Neighbourhood Plan in decision-making.....	178
Figure 24 Map of the site allocation of Newport Pagnell Neighbourhood Plan 2016.....	203
Figure 25 Citation of Newport Pagnell Neighbourhood Plan in decision-making	213
Figure 26 Citation of policies of Newport Pagnell Neighbourhood Plan in decision-making	214
Figure 27 Map of planning application (20/00133/OUTEIS).....	215
Figure 28 Map of a planning application (18/02617/FUL).....	219
Figure 29 Map of a planning application (16/00349/FUL).....	223

List of Tables

Table 1. Adopted neighbourhood plans by boroughs in London (April 2023)	69
Table 2 Citation of Kentish Town Neighbourhood Plan in decision-making.....	93
Table 3 Citation of policies of Kentish Town Neighbourhood Plan in decision-making	95
Table 4 Citation of the Hampstead Neighbourhood Plan in decision-making.....	126
Table 5 Citation of policies of the Hampstead Neighbourhood Plan in decision-making	127
Table 6. Settlement Hierarchy of Milton Keynes	152
Table 7 Citation of Olney Town Neighbourhood Plan in decision-making	176
Table 8 Citation of policies of Olney Town Neighbourhood Plan in decision-making.....	177
Table 9. Changing policies of Newport Pagnell Neighbourhood Plan	202
Table 10 Citation of Newport Pagnell Neighbourhood Plan in decision-making	212
Table 11. Citation of policies of Newport Pagnell Neighbourhood Plan in decision-making	213
Table 12. the context of the four cases	237

1. Introduction

1.1 Introduction

This thesis examines the extent to which neighbourhood development plans (NDPs) work towards implementation. The majority of existing studies have mainly paid attention to the emergence and then preparation of NDPs including: the introduction of neighbourhood planning under planning reform and localism, the designation of neighbourhood planning groups (NPGs) and neighbourhood areas (NAs), the legitimacy and representativeness of neighbourhood forums, power relationships during the production of NDPs, and housing delivery as a key indicator for assessing the outcomes of NDPs. The NDP is the product of complex processes of interaction within situated planning contexts. However, there is a lack of studies on the performance of NDPs after their adoption, the space between their preparation and subsequent outcomes. To fill the research gap, this research focuses on the work and impact of NDPs in the implementation phase using empirical evidence and a theoretical approach drawing on Patsy Healey's (1993) little used exploration of the communicative work of development plans. The thesis focuses on the relationship of NDPs to statutory local plans, their role and influence in the determination of planning applications, the perception and attitudes of those who are involved in decision-making, and the ongoing work of NPGs post-preparation. By doing so, the thesis identifies how factors of the external planning context interact with the NDP and how the relationships between these elements and NDPs simultaneously influence the work and ultimately impact of NDPs. The value of the study lies in filling an empirical gap by focusing on the practical 'work' NDPs do post-adoption.

1.2 Context and background

Neighbourhood planning (NP) was introduced as a new level of participatory neighbourhood-scale planning in England under the 2011 Localism Act. As there has been a gradual increase in the number of neighbourhood development plans (NDPs) across England, NP accordingly

has received considerable attention in academic debate and practice. As a result, there is already a great deal of literature with regard to the potential and challenges of NP and the status and role of those who prepare neighbourhood plans. Most existing studies have addressed the emergence of NP and process of preparing NDPs, and a few of them have dealt with the outcomes of NDPs, particularly in relation to the provision of housing. A major gap, however, remains due to the lack of work on NDPs 'after' their adoption. To fill the gap, this thesis focuses on the performance and effectiveness of the NDP in the implementation phase.

NDPs are uniquely created by NPGs who are mainly comprised of local communities. This contrasts to other plans that are prepared primarily by professional planners and approved by elected officials. NP, in this regard, can be seen as participatory democratic approach to planning, enabling notably communities to produce a 'statutory' plan which can shape the growth and development of their local areas. In principle, communities are involved in decision-making, establishing policies within the 'statutory' NDP which then influences decision-making. Despite the fact that local people play a key role in the preparation of the NDP, however, there is no specific guidance or instruction with regard to roles of NPGs post-preparation, despite their having invested a lot of time and effort to produce the plan and the fact they will be directly affected by the performance of the NDP. This raises questions about whether the NPG continues to work or disbands after preparation, while the NDP as living documents is theoretically taken into account in implementation.

NDPs form part of the statutory development plan in England, once the plans pass referendum and are approved. This indicates that the NDPs in principle have to be taken into account in determining planning permission for development within neighbourhood areas (NAs). However, there is no guarantee whether the NDP will be 'fully' considered or interpreted 'intact' by readers and users during the process of decision-making in practice. Given the discretionary and hierarchical planning system in England, the impact of plans relies significantly on the attitudes and inclination of readers and users, and it is in turn shaped by the power-relationships that determine patterns of development. It is therefore significant that those who make NDPs are not responsible for their subsequent implementation. Instead, determination of subsequent development applications varies with the understanding and awareness of local planning authorities (LPAs) including planning officers and elected members in the planning committee who have more power and authority to make decisions.

This generates questions about who uses NDPs in the process of decision-making; what attitudes actors have towards NDPs; whether the NDPs are used by actors in the ways local communities expected and intended; how power-relationships shape the role and ultimate influence of NDPs; whether these relationships enhance or undermine the impact of NDPs; and how NDPs influence the perception and stance of those who are involved in decision-making. This additionally brings the status and activities of NPGs post-adoption into question, particularly how they seek to ensure that their NDP is upheld and used in the process of decision-making. After all, local communities may feel sceptical about the time and energy required to produce the plan, unless NDPs are as influential as expected.

Within planning theory, development plans are now typically understood through an interactional model rather than as the directive statements imagined in earlier periods which proved incapable of dealing with the diverse interests of communities and the complexity of urban change (Healey 1993). Interactive plans work by establishing relationships with various users, including planners, developers, communities, and other relevant actors. In this context, development plans 'perform different roles within different relationships' and planners 'may construct plans which combine different messages to different audiences' (Healey, 1993, 83). That is, planners, planning and plans are in an 'interactive relationship with their external environment' which shapes the power and influence they exercise (Murdoch, Abram and Marsden, 1999, p. 192). In this regard, NDPs have interactive relationships with the external environments surrounding the plan including other plans, decision-making, plan-making and the actors who read and use the plan for various purposes. These relationships are crucial to determining the success and longevity of the plan. This raises questions about how external elements are related to the work of NDPs in the implementation stages, how various factors interact with NDPs, and the extent to which the interaction in turn enhances or undermines the effectiveness of NDPs. Hence, this thesis is valuable in exploring the performance and effectiveness of NDPs post-adoption by focusing on the ways they interact with their external contexts.

1.3 Research aim, objectives and questions

The aim of this thesis is to understand the work and impact of NDPs post-adoption, examining the interactive relationship between the NDP and the external environments surrounding them. The research scrutinises the extent to which NDPs interact with local plans, the degree to which the NDPs are used throughout the process of decision-making on planning applications, how NDPs influence the attitudes of the actors who are involved in the determination of planning permission and in the production of local plans, and the way in which neighbourhood planning groups who produce the plans seek to ensure their aspirations and intentions are realised post plan-making. In order to achieve the aim, the following research objectives were set:

- To explore the empirical and theoretical context of neighbourhood development plans in the implementation stage
- To develop and apply a framework for analysing the work and effectiveness of development plans after their adoption
- To trace and critically assess the use of neighbourhood development plans during the process of decision-making
- To explore the practical views and actual use of actors toward the neighbourhood development plans
- To contribute to literature and understanding on the implementation of neighbourhood development plans

Following the research aim and objectives, the overarching research question being investigated is, 'What is the role and impact of NDPs in the implementation stage?'. The following sub-questions are also investigated in the thesis:

- How are NDPs perceived and used by those who produce the plans and other actors involved in the implementation of the plan? How does this affect the ways NDPs are implemented and influence subsequent change?
- How do NDPs interact with local plans, and impact on decision-making?
- Whether and how do neighbourhood planning groups who prepare NDPs seek to ensure the NDP is actually upheld and used in practice?

1.4 Contribution to Knowledge

This thesis provides contributions to knowledge in two ways: empirical and theoretical. The first contribution is methodological. The study adopts quantitative and qualitative research using multiple sources of primary and secondary data to address the lack of empirical studies exploring the work of NDPs and NPG's post-adoption. As discussed above, the effectiveness of NDPs is likely to vary substantially with the perspectives and attitudes of actors in the distinctive discretionary planning system in England. Thus, the thesis also explores the 'perception' and 'actual actions' of those who produce and are affected by the plan and those who read and use it. However, the research focuses not only on the interpretation of stakeholders but also their actual activities. Most studies in the field of neighbourhood planning have primarily relied on interview data to explore perspectives of stakeholders. The quantitative data for this study is used as a counter-weight to interview data to explore the actual action of actors, tracing how the NDPs have been cited by actors at key stages throughout the whole process of decision-making. This approach helps to highlight potential contradictions between the responses of interviewees and their actual actions.

In addition, the second contribution relates to the theoretical framework. This thesis deploys and develops the concept of the communicative work of development plans developed by Healey (1993) as a theoretical tool for analysing the nature and work of a development plan in the interactive contexts in which it operates. It is significant to note that this idea is relatively under-developed and should not be confused with Healey's (1997) more widely celebrated work on collaborative planning. This thesis focuses on how development plans as 'documents' communicate their messages to others in order to influence social action. However, as her concept was produced before the introduction of NDPs, the thesis reconsiders the communicative work of development plans and the ways it can be adapted to consider the distinctive attributes of 'adopted' NDPs.

1.5 The structure of the thesis

To address the aim, objectives and questions of this research, the thesis consists of eight chapters:

Following this introduction, Chapter 2 reviews the critical literature on NP and NDPs. A significant literature has focused on the emergence of neighbourhood planning in the context of localism, the preparation of NDPs within the planning system in England, and the changing status and roles of citizens since the introduction of neighbourhood planning. This chapter identifies the key gap to be researched here with regard to the performance and influence of NDPs 'post-adoption' and the role and activities of NPGs after plan preparation.

Chapter 3 presents the conceptual framework that will be used to understand and analyse the interaction of NDPs with their surrounding planning contexts. The framework provides acted as a guide for data collection, analysis of the empirical material and interpretation of findings.

Chapter 4 sets forth the research design with reference to the research aim and questions. This chapter outlines the case study approach, the attributes of selected cases, the method taken to data collection and analysis and reflects on some limitations in the chosen research approach. The chapter identifies the methodological approach and explains the application of mixed qualitative and quantitative methods to social research. This chapter also examines challenges encountered in the process of data collection and analysis, including the impacts of the covid-19 pandemic. The final part of Chapter 4 takes the implications of ethics and positionality for the thesis into account.

Chapter 5 and Chapter 6 as empirical chapters investigate 4 chosen case studies in 2 local planning authority areas, in the line with the methods set out in Chapter 4. The chapters critically evaluate the work and use of the NDPs across the four cases, drawing on the theoretical framework they focus on the interaction of the NDPs with external factors including the local plans, the process of decision-making on subsequent development proposals, the attitude and perception of those who read and use the NDP in the production of local plans and in the determination of planning applications, and the ongoing activities post-adoption of neighbourhood planning groups.

Chapter 7 brings together the previous chapters linking the previous four empirical cases back to the literature and the theoretical framework and in order to elucidate the research findings.

Finally, Chapter 8 concludes the thesis, identifying how this thesis fulfils the research aim and objectives and answers the research questions. This chapter considers the implications and contributions to knowledge of the thesis for both planning theory and practice and provides suggestions for the future research.

2. Neighbourhood development plans in English planning system

2.1 Introduction

This chapter reviews the previous and current literature with regard to neighbourhood development plans (NDPs). The Localism Act 2011 generated a significant planning reform in the UK. In particular, Neighbourhood Planning (NP) was introduced to empower local people to shape the future of development and growth of their areas at community level. NP therefore has received considerable attention in academic debate and practice and consequently there is already a great deal of literature with reference to the potential and limitations of NP itself and neighbourhood planning groups (NPGs) who produce NDPs. Most of them have focused on the status and process of NP and a few of them have addressed outcomes of the NDP mainly relating to the number of housing units. There is a missing link between preparation and outputs of the NDP. There is a lack of studies in respect of the work and roles of NDPs and NPGs in the implementation phases such as decision-making.

This chapter begins by investigating the emergence of NP stemming from localism within the planning system in England. This provides the motivation of NP which the government and communities have sought and expected in politics and planning. The next section then looks at range and limitation of NP in particular during the plan-making process. This scrutinises the distinct delivery and changes which NP brings into English planning system, the potential and constraints of NP in expectation and reality, the roles and challenges for communities in the preparation of the NDP, the relationship among actors who are involved in NP, and the interaction with internal and external elements which affect the process of NP and its influence. The final section reviews outcomes of NDPs. This reveals what NDPs deliver in the field. In doing so, this chapter fundamentally identifies a gap and provides a basis of an analytical framework for the next chapter to fill the gap and to interpret it in order to identify and understand work of NDPs and roles of NPGs on implementation stages after adoption.

2.2 Localism, planning reform, and neighbourhood planning within English Planning System

English Neighbourhood Planning (NP) was rooted in the concept of localism. Localism can be related to wider social changes and particularly perceived deficiencies in existing political systems and can stem from a diversity of world views often linked to the liberalisation of lifestyles based on individualism and globalisation (Gallent, 2016; Brownill, 2017). Key social changes here have resulted from socially complex and diverse socio-economic systems based on individualism and pluralism which lead to conflicting interests (Gallent, 2016). Such pluralism needs local empowerment and community participation to cope with complexity (Innes and Booher, 2010), and build forms of democracy capable of absorbing diversity and difference (Healey, 1993). These social transformations have led to the crisis of traditional, social and political structures reliant on the top-down approach, professional and elite decisions embodied in representative democracy or rational planning. Existing systems, in this sense, have failed to cope with current and diverse world views, and consequently have caused social and political democratic deficits. Hence, localism is considered as a solution to such democratic deficits by enhancing democratic engagement, such as through more participatory and direct democracy in planning systems rather than relying only on representative democracy (Evans, Marsh and Stoker, 2013; Davoudi and Cowie, 2013; Parker et al., 2015; Sturzaker and Shaw, 2015; Sturzaker, Sykes and Dockerill, 2022).

Localism is related to various social phenomena and can be flexibly related to various forms of politics and governance reforms (Allen and Cochrane, 2010; Brownill, 2017; Davies and Pill, 2012; Newman, 2012). Some, in this sense, regard it as a 'nexus with multiple and contested meanings' due to diverse conflicting possibilities (Davoudi, S., & Madanipour, 2015, p. 27; Brownill, 2017). Evans et al. (2013, p. 405) consider localism as 'an umbrella term which refers to the devolution of power and/or functions and/or resources away from central control and towards front-line managers, local democratic structures, local institutions and local communities, within an agreed framework of minimum standards'. This argument implies that localism is likely to lead to empowerment through the shifting of power from higher tiers such as central government to lower tiers like local government and communities through

rising deliberative democracy and networked localised governance (Healey, 1997; Innes and Booher, 2004; Gallent and Robinson, 2012; Sturzaker and Gordon, 2017; Wills, 2016). In this regard, decentralisation is widely regarded as a synonym of localism (Sturzaker and Gordon, 2017).

Under localism, devolution and empowerment are part of a broader political strategy at the neighbourhood level in several countries including the United Kingdom (UK) (Bailey and Pill, 2015). Decentralisation to empower 'the people' is a long-standing political theme through various governments in the UK over at least the last 30 years (Allmendinger & Haughton, 2012). The 1997–2010 Labour Government defined localism through a planning reform in 2004, stressing public participation (DCLG, 2001; Office of the Deputy Prime Minister (ODPM), 2004; Lowndes et al., 2001; Shaw and Lord, 2007; Sturzaker and Shaw, 2015). However, Labour's localism was criticised due to 'being ineffective at deepening democracy' (Sturzaker and Gordon, 2017, p. 1326). This implies that despite the attempt to promote participation of citizens and to pursue political devolution, the participation of citizens and the authorities of local government were still restricted and bound in line with the orientation of the state (Lowndes et al., 2001; Mooney and Fyfe, 2006; Pratchett, 2004).

Following the 2010 general election in the UK, the Conservative and Liberal Democrat coalition Government criticised the 2004 reforms of the previous government (Sturzaker and Shaw, 2015). The coalition government advocated a big society 'to manage local affairs previously undertaken by the state' (Inch and Shepherd, 2020): 'big government are over...centralisation and top-down control have proved a failure' (Her Majesty's (HM) Government, 2010, p. 7). They then claimed to 'reverse more than 100 years of centralisation' by shifting power away from central government and towards citizens and local communities through 'the spatial rescaling and state restructuring' under their localism agenda (DCLG, 2012a; Salter, 2022). In this regard, Inch and Shepherd (2020) claims that this localism agenda was permeated with anti-statism. The coalition government enacted the Localism Act 2011 which sought to materialise decentralisation and empowerment within a new statutory and institutional framework, attempting to devolve political power, authority, and responsibility to lower-level organisations and communities (Sturzaker and Gordon, 2017; Wills, 2016). However, the rhetoric and aims of the coalition government have been also widely debated, questioning the degree of decentralisation and public participation that were created. As

Clarke and Cochrane (2013) emphasise, such freedoms are allowed in the light of ‘particular’ objectives, whilst localism of the type advocated by the Conservative-Liberal Democratic coalition government could be considered as a form of more spatial liberalism with regard to decentralisation. Brownill and Carpenter (2009), in this regard, state that localism only ever exists ‘in the shadow of centralism’.

The Localism Act 2011 included reforms of the planning system, giving rights and power to local governments and communities through a rhetorical focus on ‘democracy’ (Sturzaker and Gordon, 2017). The act effectively led to a rescaling of planning powers in England. Regional planning had been a dominant strategic policy agenda in the 1990s and 2000s, but in the 2010s it was argued this overlooked the democratic voice of communities (DCLG, 2010; Sturzaker and Gordon, 2017). This planning tier was considered to foster a top-down approach and dismantled, with the coalition government commenting that regional plans involve ‘too much central state interference’ (Inch and Shepherd, 2020, p. 68): ‘robbed local people of their democratic voice, alienating them and entrenching opposition against new development’ (DCLG, 2010).

Neighbourhood Planning was created to bring local knowledge into planning through a bottom-up approach and to rescale local solutions at the community level (Brownill, 2017; Inch and Shepherd, 2020). Such devolution of planning powers would, it was claimed, enable local communities to selectively devise their own statutory neighbourhood development plans (NDPs) to guide and shape development in a particular area (Brownill, 2017; Grimwood, 2018; Inch and Shepherd, 2020; Salter, Parker, and Wargent, 2022). The Act, in this respect, drew clear boundaries for ‘the integration of participatory democracy’ within other top-down plan-making forms of the local authority (Brownill and Downing, 2013), introducing new powers to enable NP by qualifying bodies such as town and parish councils or NFs rather than professional planners (Bailey and Pill, 2015). NP, based on the Act, comes from the bottom-up level and from groups who organise themselves; apply to be recognised as neighbourhood forums where there is no parish or town council; and then prepare a neighbourhood plan. In this regard, NP may be considered as a form of community-based and -led planning, although it still operates within a framework created by the central government, as will be discussed below. In other words, it is notable that NP is a bottom-up planning model operated by the ‘governed’, such as local residents, but operating within the hierarchy of a top-down planning

system which continues to be framed and guided by central government.

2.3 Neighbourhood Planning for Neighbourhood Development Plans

Neighbourhood Planning (NP) is devised in England as one of the forms of post-2010 localism based on the Localism Act (DCLG, 2011a; Clarke and Cochrane, 2013; Wargent, 2021; Sturzaker, Sykes, and Dockerill, 2022). Politically and institutionally, NP is based on the legislative framework provided by the Act: Section 116 and schedules 9, 10 and 11 (Gallent and Robinson, 2012; Local Government Association [LGA], 2013; Smith, 2014; Grimwood, 2018). This Act amended the Town and Country Planning Act 1990 and the Planning and Compulsory Purchase Act 2004 (Sturzaker and Gordon, 2017). Brownill (2017) indicates four propositions regarding localism around NP: creating spaces of empowerment; creating spaces oriented to economic growth and new development; remaking planning's publics as citizen-planners; and remaking planning as a collaborative and non-expert activity.

Neighbourhood development plans (NDPs) have distinctive factors in terms of the potential and constraints of initiatives, compared to other planning schemes at neighbourhood level. Firstly, communities themselves can selectively draw up a 'statutory' plan that can guide and shape development and growth for the future of their particular areas (DCLG, 2011a; 2012b; Sturzaker and Gordon, 2017; Grimwood, 2018; MHCLG (Ministry of Housing, Communities and Local Government, 2021), as opposed to previous advisory participatory initiatives like Parish Plans that had no statutory weight (LGA, 2013; Parker, Lynn and Wargent, 2015; Brownill, 2017; Edwards, 2020). NDPs as a statutory plan are given legal weight in decision-making (Sturzaker, Sykes, and Dockerill, 2022). To be specific, a NDP becomes part of the development plan when it is adopted, and consequently by law is considered alongside local plans (in London, also London Plan) in decision-making on planning applications by local planning authorities (LPAs) (Sturzaker and Gordon, 2017). It is notable that NP is a first come, first served approach. It means that the production of NDPs is optional for citizens, not a duty (Sturzaker, Sykes, and Dockerill, 2022). Secondly, NP enables communities to set selective and

particular sites. Compared to local plans which address a whole district or Parish Plans which represent the whole community, NDPs can concentrate on vision and aspirations of specific communities and their preferred outcomes from developments within designated neighbourhood areas (NAs). Thirdly, however, NDPs must meet several basic conditions to ensure plans are legally compliant and compatible with wider policy considerations. This includes following national planning policy; being in general conformity with strategic policies in local plans; contributing to sustainable development, and conforming to EU obligations and human rights legislation (Parker, Lynn and Wargent, 2015; Grimwood, 2018; Locality, 2018). Finally, in this context, NDPs cannot block development that 'is already part of' local plans. Instead, the NDP can enable communities to shape and influence 'where that development will go and what it will look like' (Grimwood, 2018). The NDPs are allowed to guide and shape development, not oppose development activities in an area (Locality 2018). That is, the NDPs 'must be pro-development and must not propose less development than pre-existing local plans do' in legislative terms (Sturzaker, Sykes, and Dockerill, 2022, p. 45; see also Bradley, 2017). Hence, these powers and conditions draw effective boundaries for the scope of NDPs.

In terms of take-up, there has been a gradual increase in the number of councils and communities adopting NP. The number of referendums rose significantly from 126 to 500, between 2015 and 2018 (Department for Communities and Local Government [DCLG] 2015; Grimwood, 2018; Ministry of Housing, Communities & Local Government [MHCLG], 2018) and 1,483 referendum results had been published by December 2022 (Planning Resource, 2022). When it comes to actual plans made, there was a significant increase from 400 in 2017 to 542 in 2018, and 1,439 in 2022 (Lichfield, 2018; MHCLG & Sharma, 2017; Planning Resource, 2022). Furthermore, 1,969 Neighbourhood Plan Areas had been designated across over 310 LPAs by 2018 (Lichfield, 2018). The figures obviously imply that currently NP plays a significant role in planning practice in England and that communities seem to participate positively in NP initiatives.

NP is more active in parished areas than urban areas. This means that a majority of NP has been implemented by town/parish councils which are pre-existing groups and mainly prepare NDPs in rural areas, rather than neighbourhood forums (NFs) which are purposely formed to lead the plan, as illustrated by Parker (2015). NP is normally produced by NFs in urban areas where there are often not parish council and where there are generally relatively more

stakeholders since cities are often super- or hyper-diverse heterogeneous areas (Tribillon 2014; Colomb, 2017). Due to such diversity, it is relatively more arduous to constitute new forums and to designate neighbourhood areas (NAs) (Colomb, 2017). Consequently, there have been mostly lower levels of voter turnout at referendums in urban areas than town and parish areas. Though, it is notable that much data on NP has focused on the frontrunners (or early adopters) who had been involved in the first five years of the introduction of NP and even encouraged to undertake the preparation of NDPs 'in advance of the enactment of the Localism Bill' (Parker, Lynn, and Wargent, 2015, p. 523; see also Ludwig and Ludwig, 2014; Parker and Street, 2015; Sturzaker and Shaw, 2015; Parker and Salter, 2017; Wargent, 2021). Evidence from more diverse urban areas is therefore relatively scarce as a result.

Participation of communities

Communities as neighbourhood planning groups (NPGs) play a key role in the production of NDPs. The form and process of plan-making of England has been changed to improve public participation in preceding years (Sturzaker and Gordon, 2017), since people believed that government cannot be expected to deal with all locally-specific affairs and that decision-making needs to be 'more responsive' to the unique qualities of different localities (DoE and MAFF, 1995: 16). NP is mainly driven by community, impacting where it goes and how it looks in their areas, compared to other plans that are mostly prepared by professional planners and approved by elected officials (Gallent and Ciaffi, 2014; Brownill, 2017; Gallent, 2016; Locality, 2018). NP is performed by mainly three types of qualifying bodies as NPGs including the town/parish councils (often through steering groups), or Neighbourhood Forums (NFs) in areas where neither of these exist (Bailey and Pill, 2015).

National Government and numerous local planning authorities (LPAs) are interested in 'communities' as localised socio-political systems in England, since they believe areas at the community level can become a key place for improvement of public services and collaborative decision-making (Healey, 1997; Lowndes and Sullivan, 2008) that especially deal with complexity (Innes and Booher, 2010). In this regard, activism of communities has received significant attention in the academic literature and in practice, covering various aspects including their right, participation, legitimacy, roles and capacity in NP delivered through

planning reform under localism in England (Cowie and Davoudi, 2015; Parker, Lynn, and Wargent, 2015; 2017; Matthews, Bramley, and Hastings, 2015; Sturzaker and Shaw, 2015; Gallent, 2013; Gallent, Hamiduddin, and Madeddu, 2013; Lord et al., 2017; Parker and Salter, 2017; Sturzaker and Gordon, 2017; Vigar, Gunn, and Brooks, 2017; Wargent and Parker, 2018; Sturzaker, Sykes, and Dockerill, 2022; Wargent, 2021).

There were particularly strong assumptions that 'localism, delivered through NDPs, would be dominated by self-interest' and that local people would tend to resist additional housing development in particular (Sturzaker and Shaw, 2015, p. 603; see also Newby, 1985; Shucksmith, 2000), while 'equally there is an increasing body of research which seeks a more nuanced understanding of opposition to development' (Sturzaker and Shaw, 2015, p. 589-590). In this circumstance, NIMBY (not in my back yard) is prevalently used as a pejorative term of 'localised and typically self-interested opposition to development' in particular in connection with new housing (Inch, 2012, p. 520; see also Clifford and Warren, 2005; McClymont and O'Hare, 2008; Matthews, Bramley, and Hastings, 2015; Sturzaker and Shaw, 2015). The UK Government, however, deemed that antagonism to new development can be released through greater participation of communities in planning (DCLG, 2010) and some studies have supported that the perspective of the government has some ground 'in reality' (Sturzaker and Shaw, 2015, p. 603; see also Parker et al., 2010; Sturzaker, 2011). The government therefore conceived that citizen would be more likely to accept development such as housing or land for new housing (DCLG, 2011), if they are 'incentivised and given the opportunity to plan for their area' (Salter, Parker, and Wargent, 2022, p. 4; see also Inch, 2012; Matthews, Bramley, and Hastings, 2015; Tait and Inch, 2016). However, despite such claims on the part of government, as will be discussed later, provision of housing development delivered through NDPs has been limited (DCLG, 2015, 2016; Lichfields, 2018), whilst Salter, Parker, and Wargent (2022) note that 'methodological flaws and limited sample sizes' are pointed out with respect to the assessment of outcomes which NDPs deliver (Bradley and Sparling, 2017).

In practice, local people have a diversity of attitudes towards developments, with some tending to promote development but others seeking to control it (Parker et al., 2014; 2015; Turley, 2014; Parker, Lynn, and Wargent, 2015; Sturzaker and Shaw, 2015). Some studies illustrate that a majority of citizens highlighted two main motivations for undertaking NP:

reinvigorating the local area and protecting its desirable characteristics rather than only dealing with provision of housing which is a key priority of the government (Parker et al., 2014; Parker, Lynn, and Wargent, 2015). This means that NDPs have been produced purposely 'to advance socially and environmentally sustainable solutions, to prioritize identity, heritage and protection' and to meet the housing targets which are required by local plans of LPAs (Parker and Salter, 2017, p. 486). Hence, provisions and contents within NDPs consequently vary with distinct orientation and aspiration of NPGs, since Parker, Lynn, and Wargent (2015, p. 525) illustrate 'the theme of shaping a local vision was raised throughout the responses and was more prominent than shaping specific projects or land-use policies'.

NPGs are an unusual structure, a 'combination of a non-compulsory, volunteer-produced, statutory plan' operating through participatory and direct democracy within the existing planning system in England (Sturzaker, Sykes, and Dockerill, 2022, p. 44; see also Davoudi & Cowie, 2013; Parker et al., 2015; Sturzaker & Shaw, 2015; Sturzaker & Gordon, 2017). NP is optional for local communities rather than compulsory; and is embarked on under a first come and first served approach. In other words, the NPGs are volunteering with statutory power through their NDPs. Nonetheless, NP is still an 'invited space' which is framed by the government and 'bounded with a limited scope or freedom for participants' (Parker and Salter, 2017, pp. 479-480; see also Cockburn, 1977; Gaventa, 2004; Parker et al., 2015; Brownill, 2017).

In addition, despite the fact that inclusive participation of communities as a proxy is regarded as a key element in NP, previous research has pointed out that a small number of local people are actively involved in the production of NP and they are 'the main force behind progress' with key skills, experience and professional abilities which vary greatly between areas (Parker, Lynn, and Wargent, 2015, p. 526; see also Gallent, 2013; Parker and Murray, 2012; Vigar, 2013; Parker, Lynn, and Wargent, 2017; Wargent and Parker, 2018). Wargent and Parker (2018) note that the plans are normally produced by fewer than 12 local people and mostly by one or two individuals. This means that NPGs are 'not necessarily the full set of people constituting the Qualifying Body or a larger body of community members' (Parker, Lynn, and Wargent, 2015, p. 526). Some factions with communities, in this regard, may resist the adoption of a NDP, whilst plans are prepared by groups who cannot fully represent their communities, particularly within NAs, as will be discussed later. As a result, Parker, Lynn, and Wargent (2015)

note that 'the plan and its content simply results in performing national agendas, or conversely in reflecting the predilections of a small group of people residing in the neighbourhood'.

Unlike town and parish councils, NFs are purposely set up to produce NDPs and must include a minimum of 21 local individuals in order to be officially approved by LPAs (Locality, 2018). The NFs frequently face a representation issue, as they are self-selected. While town and parish councils are democratically representative like LPAs, the NFs become representatives without any democratic mandate and have no obligation to operate as democratically elected institutions (Sturzaker and Gordon, 2017). From a formal representation viewpoint, the designation of NFs 'can be regarded as a departure from democratic planning processes', since a new group or organisation must apply to the LPAs to be designated as a NF without a formal election (Davoudi and Cowie, 2013, p. 562; Cowie and Davoudi, 2015, p. 168; see also Grimwood, 2018). This raises questions around the accountability of NFs to their wider neighbourhood context. In this context, NP involves the mix of 'representative and direct democracy' with participation of communities, but the complex and overlapping space of 'democracy, representation and participation' brings practical issues related to legitimacy, representation, conflicts and power (Sturzaker and Gordon, 2017). Moreover, the designation of most NFs is undertaken by those who are normally already most powerful and active in society, and have plenty of experiences and capacities. Moreover, as with NPGs in general, NDPs are typically prepared by small groups within NFs, often the committee of the forum who are elected within internal meetings.

Communities involved in NP normally feel burdened to progress the plan for several years and often struggle with internal capacity and resource availability constraints (Parker, Lynn, and Wargent, 2015), although they as volunteers invest substantial time and energy to do it. Local people in a number of NP cases tend to commission and rely on private consultants who have professional expertise in planning (Brownill, 2017; Parker, G., & Wargent, 2017; Parker, Lynn and Wargent, 2017), since they have limited time and financial resources and insufficient planning skills particularly in writing, and are unfamiliar planning language (Parker, Lynn, and Wargent, 2015; Wills, 2016; Brownill, 2017). This implies that the local people normally lack the capability to transform their aspirations and objectives into planning language, while they desire to influence 'planning policy and local agendas more generally' through their NDPs

(Parker, Lynn, and Wargent, 2017, p. 461). Thereby, professional planners can exert influence over the style and contents which citizens raise at early phases of NP, moderating the aspirations and concerns of participants by seemingly ‘providing “objectivity”’ (Parker, Lynn, and Wargent, 2015, p. 532; p. 583). To be specific, the original views and preference of communities can be rescripted during the process of NP, since certain contents have been affected in such reworking by external planners involved. In this regard, some NDPs end up with a gap between initial and final versions of plans and documents (Parker, Lynn, and Wargent, 2015). However, NPGs typically have accepted such modification by consultants rather than attempting to fully reflect their actual ambitions and objectives, taking a safety-first mode as ‘anticipatory conservative positions’ in order to complete the complex process of having an NDP approved, including examination by an externally appointed expert and approval by the LPA (Parker, Lynn, and Wargent, 2015, p. 531; Wargent and Parker, 2018, p. 385). Parker and Murray (2012, p. 8) also point out that ‘participation becomes moulded to suit the decision makers rather than the participant’. Consequently, inadequate support of LPAs under the light-touch regime which the government advocated results in a long and complex process for local communities (DCLG, 2012b; Inch, 2015; Wargent, 2021; Sturzaker, Sykes, and Dockerill, 2022).

After the preparation stage in NP, NPGs have no formal roles in implementation of post-adoption NDPs without further guidance or directions when the plan comes into force (Cowie and Davoudi, 2015; Locality 2018). In particular, unlike Town/Parish Councils that usually already exist, NFs exist to prepare NDPs for a maximum period of five years only as set out in legislation, since the forums are chiefly designated to produce the plan (Locality, 2018). This means that their status is not automatically extended and therefore they need to be redesignated by the LPA every five years as set out in legislation, if desired. In addition, whilst there is no formal requirement to review or modify a NDP, the need for the adopted NDP ‘to be regularly reviewed has become imperative’ and ‘it used to be considered that a review every five years was appropriate in most cases’ (Edwards, 2020, p. 148). This implies that NPGs are implicitly expected to continue to exist to ensure the modification of the plan. The NDPs are also highly likely to be reworked and reinterpreted by readers or actors on implementation including decision-making processes. In other words, policies in an adopted NDP reflecting local communities’ original intentions can be diversely understood and

interpreted by different actors who use them, for example, when they produce or assess planning applications. Further research is therefore necessary to investigate status and roles of NPGs as citizen-planners after the adoption of NDPs, where there is no specific and clear guidance for them: whether NPGs are involved in implementation of NDPs and how they seek to ensure their NDPs are used and upheld in order to accomplish the original intention in their NDPs becomes important questions.

Neighbourhood planning

Qualified groups are eligible to prepare a Neighbourhood Development Plan (NDP), a Neighbourhood Development Order (NDO) or a Community Right to Build Order (CRtBO) (Locality, 2016; Grimwood, 2018). The town or parish councils, or the prospective NPs submit their proposed neighbourhood areas (NAs) to the LPAs 'who assess them for "representativeness" and decide whether an NP can proceed' (Vigar, Gunn, and Brooks, 2017, p. 3; see also Locality, 2018). Once the NPGs and the designated NAs are set, the qualifying bodies draft NDPs in line with their vision and objectives. The plan must meet the basic conditions set out in planning legislation (Locality, 2012; 2018; Wargent, 2021). When the draft plan is made, community organisations submit it to LPAs for pre-submission consultation. When the neighbourhood planning organisations submit the proposed NP to LPAs, the LPAs then publicise the plan, arrange for an independent examination, and check the adequacy of the basic conditions and other legal requirements (DCLG, 2015b; Locality, 2018). If successful, the LPAs arrange a referendum. Once the proposed NDP passes examination by independent examiners and a referendum with a majority yes vote, the plan forms part of the 'statutory' development plan 'against which all proposals for new development would be assessed' within NAs (Sturzaker and Shaw, 2015, p. 587; see also DCLG, 2015b; Grimwood, 2018; Locality, 2018).

NP can be regarded as following a bottom-up approach, but necessarily interacts with the existing hierarchical planning system. In other words, NP partly contributes to the empowerment of local people (Parker & Street, 2015; Wills, 2016), but, as a large body of research frequently points out, this movement is generated within a framework which is moulded by central and local governments (Gallent & Robinson, 2012; Gallent, 2013; Parker

& Street, 2015; Sturzaker and Shaw, 2015; Wills, 2016; Sturzaker and Gordon, 2017; Sturzaker, Sykes, and Dockerill, 2022; Hickman and While, 2023). In this regard, researchers comment on 'contradictions in both rhetoric and policy' of central government who advocated decentralisation through localism at least in planning by stating that NP enables local people to shape the future and growth of the areas where they live and work (Sturzaker, Sykes, and Dockerill, 2022, p. 45; see also DCLG, 2011d; Salter, 2022; Hickman and While, 2023). In other words, NPGs as citizen-planners 'are empowered only to make choices that will implement agendas and priorities set by remote state and/or corporate actors' (Yuille, 2022, p. 343).

In order to meet the test of an independent examiner, NDPs have to comply with basic conditions mainly relating to higher-level planning policies, including the National Planning Policy Framework (NPPF), local plans and, if in London, the London Plan and other legal requirements which are set forth 'in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended)' (Parker and Street, 2015, p. 795; MHCLG, 2021, p. 23; Wargent, 2021, P. 577; see also Smith & Wistrich, 2016; Lord & Tewdwr-Jones, 2018), although policies and content of NDPs are flexible and local communities have discretion in their selection. This indicates that the scope of NDPs is bounded by the strategic policies 'in any development plan that covers their area' (MHCLG, 2021, p. 10; Salter, Parker, and Wargent, 2022, p. 5).

In addition, as noted above NDPs must be pro-development and are expected to contribute to the development and growth set out in higher tier plans (Sturzaker and Shaw, 2015; Parker and Street, 2015; Smith & Wistrich, 2016; Lord & Tewdwr-Jones, 2018; Sturzaker, Sykes, and Dockerill, 2022) since they 'should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies' (MHCLG, 2021, p. 10; Wargent, 2021; P. 580; Salter, Parker, and Wargent, 2022). According to the NPPF (2021), NDPs 'should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies' (MHCLG, 2021, p. 7). For example, NDPs are expected to at least accept the level of housing targets required in local plans of LPAs. This means that a NDP has a complex interaction with the local plan. However, there is still a lack of studies exploring the relationship between local plans and NDPs in practice during the implementation stages. This also implies that LPAs still retain a power to frame 'the constitution and content' of NDPs during NP (Parker et al., 2017;

Sturzaker & Shaw, 2015) and, as will be discussed later, continue to exercise power in decision-making on planning applications when NDPs can come into force (Sturzaker, Sykes, and Dockerill, 2022). In this regard, Parker and Street (2015, p. 795) point out that there are crucial requirements and challenges for the NDPs 'as potential routes towards empowerment'.

Roles of local planning authorities as a form of the light touch approach

The stance and attitudes of actors towards NP are a substantial influence under the English discretionary planning system (which is regarded as a contrast to rules-based, regulatory zoning approaches (Bäing, and Webb, 2020)). This implies that those who have the power and authority are likely to exert more influence than others, not least since the draft of NDPs is required to be examined by independent examiners and approved by LPAs prior to adoption. This implies 'decision-makers in "higher" tiers of governance limiting the scope of participation practices' (Sturzaker and Shaw, 2015). In this regard, LPAs are one of the most influential factors during the process of NP, as discussed earlier, since they have a duty to support and are required to approve Neighbourhood Planning Groups (NPGs) and Neighbourhood Areas (NAs); screen the emerging NDP; and have responsibility to accept the finalised NDP and will play a key role in its subsequent implementation (Sturzaker and Shaw, 2015; Parker, Lynn and Wargent, 2017; Locality, 2018; Salter, Parker, and Wargent, 2022).

From a purportedly 'light touch' approach (DCLG, 2011d), LPAs also have a legal duty to support those bodies producing a NDP in their area in line with the Localism Act 2011 (Smith, 2014; Parker, 2015; Parker, Lynn and Wargent, 2015; Brownill, 2017; Lord et al., 2017; Parker, Lynn, and Wargent, 2017; Grimwood, 2018; Locality, 2018; Sturzaker, Sykes, and Dockerill, 2022). This indicates that LPAs need to provide support for community groups, arrange the inspection and referendum, and adopt a plan which passes at referendum (Locality, 2018). Nonetheless, there are variable levels and quality of support from LPAs, since their roles are amorphous due to limited specification and the lack of clear guidance from central government. (Parker, Lynn and Wargent, 2015; Parker, Lynn, and Wargent, 2017; Wargent, 2021; Sturzaker, Sykes, and Dockerill, 2022). Parker, Lynn, and Wargent (2017, p. 457) describe that the light touch approach signifies that 'no service standards were created to

assist communities to organise co-production relations effectively, with responsibility for actual policing passing onto the LAs and examiners.’ Furthermore, ironically, such a light-touch method advocated by the government has caused a long and difficult process of NP and frustration of those who are supported during the production of NDPs (Parker, Lynn, and Wargent, 2017; Parker and Salter, 2017; Sturzaker, Sykes, and Dockerill, 2022). In NP, the issue fundamentally is associated with citizens becoming planners and making these choices themselves, while the role of LPAs becomes much less central.

Consequently, communities have been left asking for more support and clear guidance (Parker, 2017). LPAs are often also required to play a more involved and mediative function for NP beyond the light-touch. For example, there were two competing applications for designation of NFs and NAs for a large site in North Hackney in the London Borough of Hackney. Since both groups could not reach a consensus by themselves, they launched a petition and depended on decisions from the council (Colomb, 2017). The communities involved finally recognised that LPAs remain necessary for planning. This implies planners being required to exert ‘practical judgments’ politically and ethically: ‘who is and is not invited to meetings; where, when, and what kind of meetings are held; what issues should and should not appear on agendas; whose concerns are and are not acknowledged’ (Forester, 1988). If NP merely rescales planning to a community level within an existing political process which neglects tensions and the power imbalance, it will be ineffective in relieving conflicts, undermining one of the main goals of NP under localism (Gallent, 2016).

Hence, LPAs, especially planners, are expected to take on a more mediation/interventionist role practically in order to reduce disputes throughout ‘a participatory planning process’ as Forester (1988) insists. Given power relationship among actors involved in NP, there are real dangers of the powerless, like a minority view in compromise processes, are being kept powerless. Authorities can therefore play a role in coping with conflicts and relevant issues to ‘organise, politicise and empower’ communities to raise the availability of ‘democratic politics’. Thus, LPAs arguably need to be given more specific and clear guidance in order to deal with power imbalances of access, information, and expertise which could cause tensions among NP actors and consequently affect the quality of planning outcomes beyond the light-touch approach. However, LPAs have no flexibility in whether they want to support NPGs or not in practice (Brownill, 2017), while the nature and extent of ‘support’ are unclear to them

(Parker, Lynn and Wargent, 2015; 2017). LPAs also have limited scope to offer support, regardless of their willingness and passion, since they have faced massive planning budget and staff cuts in England (Wargent and Parker, 2018; Sturzaker, Sykes, and Dockerill, 2022). As a result, the LPAs sometimes respond to requests for information or assistance to NPGs insufficiently, inefficiently, and slowly (Sturzaker, Sykes, and Dockerill, 2022).

Despite the severe restrictions on LPAs' financial and human resources, planners still have significant influence practically and politically not only during preparation of NP but also in implementation. LPAs retain the legal power to make decisions throughout the planning processes, despite government attempts to shift the locus of decision-making from the central tier towards local people (DCLG, 2011). For example, since NFs and NAs are designated 'by' LPAs. LPAs, in this regard, enable and shape NP in different ways (Salter, 2022; Salter, Parker, and Wargent, 2022). This seems to reinforce the power of traditional representative democratic institutions within the hierarchical planning system of England (Sturzaker and Gordon, 2017), producing a type of managerial localism (Evans, Marsh and Stoker, 2013). In this way, some illustrate that central government and LPAs retain plenty of power to frame and constrain the planning activities of communities (Featherstone et al., 2012; Gallent and Robinson, 2012; Sturzaker and Shaw, 2015; Sturzaker and Gordon, 2017). Some communities therefore feel that they have a lack of power to fully reflect their voice and aspirations in NDPs (Parker, Lynn and Wargent, 2015; 2017), despite the government frequently intimating that they intended to empower citizens. Hence, producing NDPs varies with attitudes, willingness, knowledge, perception, and orientation of LPAs who can be more or less supportive under the discretionary planning system in England. For example, Salter classifies the responses of LPAs to NP as 'the deflective, the reactive and the integrative' (Parker and Salter, 2017, pp. 479-480; Salter, 2022, p. 54; see also Healey, 2015; Parker & Salter, 2016). In this connection, further research is needed to explore power dynamics within relationships between LPAs and NPGs in implementation phase, including the process of decision-making on planning applications in order to examine whether NDPs are fully upheld and used consistently by different decision-makers.

Neighbourhood Development Plans (NDPs) as outputs of NP

NDPs are outputs of NP and contain 'local planning policies for a particular designated site known as a neighbourhood area (NA) (Edwards, 2020, p. 273). Despite the policy presumption that the NDP should be pro-development, in practice they can be orientated towards a relatively more pro-growth or more protectionist approach to development depending on the attitude of citizens. Policies and contents of the plan therefore vary with the aspirations and inclinations of local people and the Neighbourhood Planning Groups (NGPs) who prepare plans, as locally-specific characteristics and concerns are reflected in NDPs (Sturzaker and Shaw, 2015). Significantly, despite the fact that provisions within NDPs are meant to be established on the basis of the opinions and views of local people, controversies have still arisen in some areas.

Uniquely within the English planning system, NDPs must pass a referendum of those who live within NAs before they can be 'made' by the LPAs. If more than half of those voting in a referendum vote 'yes', then the plans can become part of the statutory development plan by LPAs. Most NDPs have been supported by the majority with high yes votes of over 80% (Sturzaker and Shaw, 2015; Carpenter, 2016). Referenda are set out for constituents to directly participate in approving the output of NP, opening the decision-making space to them for their areas (Sturzaker and Gordon, 2017). Although NDPs must pass referendum, some researchers still note limitations in the representativeness of NDPs, notably due to insufficient rates of participation in the referendum, since 'low turnouts in the referendums are indicative of a lack of' the symbolic representation (Sturzaker and Gordon, 2017, p. 1332; see also Davoudi and Cowie, 2013; Wargent and Parker, 2018). The average turnout is 32.4 per cent but has been as low as 11 per cent in some cases (Carpenter, 2016). In this regard, Cowie and Davoudi (2015) argue that low turnouts imply a lack of symbolic representation, and, in that respect, local citizens seem to rarely accept NPs as representing them. However, while voter participation is a key indicator it is insufficient to examine the representativeness or legitimacy of NDPs only by the level of turnout. Hence, there needs to be more evidence in order to evaluate not only the proportion of a high yes vote in a referendum (Cowie and Davoudi, 2015) but also the extent to which plans meet the interest and values of the wider community in line with their aspiration and objectives, for example, socially and environmentally.

In addition, despite the fact that local communities invest considerable energy and time to produce the NDPs, overcoming significant adversities before a referendum is finally passed, conflicts and controversies can still remain in some neighbourhood areas (NAs). For example, the Thame Neighbourhood Plan which was the first NDP to allocate sites for development in July 2013 and passed a referendum in May 2013 with 76.5 per cent of a 39.8 per cent turnout voting “yes”, yet some residents have protested against the plan, highlighting the ‘tension between citizen participation, representative and direct democracy’ (Lord et al., 2017, p. 354; Sturzaker and Gordon, 2017, p. 1332; see also Ellis, 2011; Cook, 2013; Gallent, 2015). Such a situation leaves questions with regard to the representativeness of NDPs, whether plans can sufficiently reflect the diverse aspirations and inclinations of the whole local population in NAs. This concern may bring further issues for readers and users such as developers or planning officers when they later come to prepare and assess planning proposals in the implementation stages. Although a statutory NDP is part of development plan and has legal weight in decision-making on planning schemes, the discretionary planning system relies heavily on the interpretation and understanding of decision-makers and their perceptions of the legitimacy of NDPs. The next section will discuss outcomes of NDPs and how these can be delivered.

2.4 Outcomes of Neighbourhood development plans

Studies and reports on the implementation of NP are still relatively rare compared to the large literature on the production of NDPs. Most of those that do exist have focused on the outcomes of NDPs in relation to housing supply as a key indicator of the impact of NDPs (DCLG, 2015; 2016; Bailey, 2017; Bradley, 2017; Bradley and Sparling, 2017; Field and Layard, 2017; Salter, Parker, and Wargent, 2022). This approach is based on the grounds of the government’s key policy priority and rhetorical claim that the participation and support of local communities can result in housing growth: *Community involvement ... It is hoped that this will lead to behavioural change in such a way as to make local communities more predisposed to accept development. As a result, it is anticipated that greater community engagement, coupled with financial incentives, could lead to an increase in development.* (DCLG, 2011b, p. 16). In this context, the planning and legislative framework under localism

intends NP to contribute to increases in housing output and economic development (Salter, 2021).

Despite government's confident assurance and anticipation that NDPs can contribute to the supply of housing by transforming local people's NIMBY anti-development inclination into a pro-growth and pro-development orientation and by widening their engagement with neighbourhood planning (NP), a minority of NDPs have met and exceeded the requirement of local plans (LPs) of LPAs. Some research illustrates that NDPs that allocate sites for housing development have 'ostensibly' met and exceeded the prescribed housing requirement in local plans of LPAs (Salter, Parker, and Wargent, 2022, p. 6): DCLG reported an increase of 11% in 2015 and 10% in 2016 respectively; the planning consultancy Lichfields identified 2.9% of NDPs; and Salter, Parker, and Wargent (2022) suggested 19% of the NDPs they researched. These results need to be addressed with caution, since each calculation is based on different methods and assumptions (Salter, Parker, and Wargent, 2022). It remains methodologically challenging to establish 'the contribution of NDPs to overall housing supply' (Salter, Parker, and Wargent, 2022, p. 6; p. 16).

Moreover, some communities have allocated less or no-sites for housing delivery in NDPs, due to different motivations, the additional technical burdens, potential for controversies among local people, and/or to the slow local plan process (Vigar et al., 2012; Parker, Lynn, and Wargent, 2014; Parker, Lynn, and Wargent, 2017; Salter, Parker, and Wargent, 2022). The motivation of those who are involved in NP is not necessarily to allocate sites for development, but they rather tend to seek 'to "shape" the development of their area', 'to improve quality of development' and 'to tailor development to local needs' (Salter, Parker, and Wargent, 2022, p. 7; p. 11). Thus, Salter, Parker, and Wargent (2022, pp. 17-18) assert that '*in as much as it is challenging to isolate the role of NDPs in net additional allocation or delivery of housing, it is insufficient to consider the inclusion of housing-related policies as an indicator of a more positive approach towards development per se. ... Such a focus obscures the wider benefits of community-led planning and turns attention away from the complexity of the planning policy hierarchy and the range of actors, institutions, and interests involved*'.

Therefore, caution is required when examining the direct or indirect impact of NDPs on housing numbers (Salter, Parker, and Wargent, 2022). This highlights a need for further

research to understand what factors affect the outcomes of NDPs, including housing numbers but also with regard to other objectives in NDPs, and how NDPs influence both subsequent decision-making and ongoing revision of local plans in terms of both the levels and quality of development delivered.

Housing delivery is one potential end result of the influence of NDPs on decision-making processes on planning applications. This makes clear an assumption that NDPs will have influence on outcomes and raises questions about the work NDPs can and do perform in decision-making. As discussed above, local people can decide to allocate sites for housing development, although they have to accept housing targets which are required and allocated by LPAs in local plans regardless of the preference and agreement of local communities. Different NDPs have set out with different structures, contents, and provisions to deal with distinct local affairs and visions, not only for the supply of housing. Any assessment therefore needs to consider the nature of NDPs in line with both the priority of central and local government and the objectives of local people as articulated in NDPs. However, the effectiveness of NDPs also needs to be explored more comprehensively, in relation to both housing and non-housing-related policies.

NDPs consequently need to be taken into account as ‘part of a dynamic, complex and changing system’, considering that their roles and performance fit within a wider hierarchy of planning policies, subordinate to the influence of external conditions and elements including the relationship with local plans, the stance of LPAs, the inclination of developers, and the attitude of communities (Salter, Parker, and Wargent, 2022, pp. 15-16; see also Parker, Street, and Wargent, 2018). Salter, Parker, and Wargent (2022, p. 14) illustrated that the impact of NDPs was sometimes seen to result more from such external factors, rather than actual policies or the mere existence of NDPs, raising a need for further research to explore ‘the actual use of NDPs in decision-making and their role in the planning application process’. They particularly point out that the timing of updates to local plans and the willingness of LPAs are crucial variations that shape the effectiveness of NDPs.

A number of NDPs frequently have been produced in advance of up-to-date local plans (Parker & Salter, 2017; Parker et al., 2020; Salter, Parker, & Wargent, 2022). This risks subsequent local plans undermining NDPs (Salter, Parker, & Wargent, 2022), generating the

potential that NDPs need to be revised to adjust to emerging and up-to-date local plans, particularly in terms of the designation of housing allocations. If not, NDPs are likely to be undermined, overlooked, and given less weight in decision-making (Salter, Parker, & Wargent, 2022).

This means that NDPs have ‘a limited lifespan’ and have ‘a complex entanglement’ with the wider hierarchies of the planning system, including national and local planning policies (Salter, Parker, & Wargent, 2022, p. 5; p. 14). Nonetheless, local plans and neighbourhood plans (and, in London, London Plan) co-exist as parts of the statutory development plan rather than having a solely one-way or top-down relationship. Existing plans can and do influence emerging plans. Thus, further research is also required to make sense of the interaction between local plans and NDPs, scrutinising both how NDPs were affected by policies in existing local plans but also how subsequent local plans consider and reflect approved NDPs.

Despite the rhetoric of decentralisation and empowerment through NP under localism, LPAs still have more power and are given more weight in the determination of planning applications than local individuals and groups, including neighbourhood planning groups (NPGs). In this regard, Salter, Parker, and Wargent (2022) describe that ‘the effectiveness of neighbourhood planning as a policy tool may also be influenced by the response of the LPA and their attitude towards neighbourhood planning’ (Parker et al., 2014; Brownill, 2017; Salter, 2018, 2022), and highlight ‘the need for better communication of how NDPs are considered in decisions’ given ‘the disparity between LPA and community perspectives’ and power (Salter, Parker, & Wargent, 2022, p. 16). This raises questions about the role of local communities and NPGs after the adoption of the NDPs where, as discussed above, there is a lack of guidance for them on implementation; and calls for empirical evidence about whether and how ‘better’ communication between LPAs and local people may be necessary and influential in the determination of planning applications in practice. For these, further research is needed to explore the process of decision-making in depth, focusing on how NDPs are practically used by various actors at key stages. In addition, it is important to explore whether and how NPGs and local communities seek to ensure that their NDPs are upheld and used to achieve the aspirations and objectives articulated in NDPs; and the extent to which their activities affect the perception and stance of other actors, including developers and decision-makers.

2.5 Summary

This chapter has reviewed neighbourhood planning (NP) as part of a planning reform agenda instigated under the aegis of localism. Participation of local communities is regarded as a key reason to seek decentralisation through NP in politics and planning, while central and local government and local people respectively all have distinct aims and hopes for NP. This chapter has also scrutinised a wide range of literature with respect to the production of statutory neighbourhood development plans (NDPs) within the discretionary but hierarchical planning system in England. Previous studies have described how NP is entangled with a variety of external elements which variously benefit or limit its progress and bound its scope and function, limiting the participation of neighbourhood planning groups (NPGs). This clearly implies that NP has interactional relationships with internal and external environments during NP. In addition, this chapter has explored the outcomes or performance of NDPs, arguing these have mainly been assessed in line with the priority of central and local government rather than those of the communities involved in the preparation of NDPs and will be affected by their plans. Although the evidence remains unclear, overall, it seems NDPs have contributed less to the provision of new housing than government rhetoric suggested.

By tracing NP from its emergence through the production of NDPs to consider their outcomes, the chapter has highlighted that existing literature has mostly focused on the formation and preparation of NP, with a smaller number of studies having addressed the outcomes of NDPs and with a bias towards considering the provision of new housing. This implies a lack of empirical research on the long-term trajectory and more diverse dimensions of NDPs 'after' their adoption, and specifically a crucial gap in research on the work involved in the implementation of NDPs between their adoption and the production of outcomes. For example, what happens to local plans and decision-making after adoption of NDPs; what effect do NDPs have on decision-making and subsequent developments; and what happens to those who produce the NDPs. These issues seem vitally important to develop understanding of the ongoing experiment with NP in England. They also resonate with a small but important, wider literature on the roles and performance of development plans. It is to this that we turn next in order to introduce the conceptual framework, drawn from Healey's (1993) work on the communicative work of development plans, that guided the research and

its exploration of the interaction of NDPs with external elements during their implementation, and the status and roles of neighbourhood planning groups after the preparation of NDPs.

3 The role of the plan after plan preparation: a conceptual framework

3.1 Introduction

The previous chapter has reviewed literature with regard to the preparation and outcomes of neighbourhood development plans (NDPs) and revealed a gap in research with respect to the status and roles of NDPs post-adoption in the implementation stages, including the influence they can exercise in decision-making and the production of local plans. This chapter sets out the theoretical and conceptual framework through which the rest of the thesis will seek to understand the work, impact and ultimately power of NDPs to realise their intended outcomes.

The chapter comprises two main sections. The first section discusses Healey's (1993) ideas around the communicative work of development plans as a framework for this research that offers a productive means of analysing the nature and performance of a development plan in the interactive contexts in which it operates, whilst this concept is relatively under-developed by Healey and not widely applied by others. The second section then seeks to re-work the communicative work of development plans to better fit the distinctive nature of NDPs and the ways they operate within the discretionary and hierarchical planning system in England. It does so by identifying how elements of the external planning environment interact with NDPs and how the relationships between these elements and NDPs influence the work and ultimately impact of NDPs. By doing this, the chapter develops the analytical framework that grounds the subsequent chapters on research methods and the empirical case studies.

3.2 The role and nature of plans in planning

'Planning implies having a plan' and the plan is the power of planning instrument (Rydin, 2011,

p. 17; see also Healey & Shaw, 1993; Murdoch, Abram, and Marsden, 1999). The plan expresses intentions and aspirations for the future development of area through 'a multitude of tools such as statements, diagrams, written policies and perspectives, or other documents', helping 'connect people to places by bringing people together to shape a common destiny' (Neuman, 1998, p. 214; Cullingworth et al, 2015, p. 85). Purposes of plans vary with social context and political climate, as priorities which plans seek to address through embedded policies reflect main concerns and aspirations of contemporary people and place at that time at that place (Parker and Doak, 2012). In the United Kingdom (UK), for example, 'economic issues were the priority in the 1980s', and, afterwards, other issues such as 'environmental quality and social integration' have been increased in 'importance in the planning system' as societies become more diverse (Healey, 1992c, p. 427; MacGregor and Ross, 1995, p. 42).

Plans 'can take different forms and be achieved in different ways' (Rydin, 2011, p. 17; see also Cullingworth and Nadin, 2006). In the UK, development plans are considered as 'a key tool of spatial planning practice' (Healey, 1993, p. 83). The roles of plans in activity have been changed from plans-as-program view or 'command and control' model in which 'the state is seen as orchestrator and developer, using plans as 'blueprints' for its development activities', to plans-as-communication view or a pluralist and interactional model in which 'the plan is a store of policy principles and criteria, goals and objectives, intended to guide but not determine regulatory decisions', providing 'sufficient flexibility' (Healey, 1993; 1994, p. 40; Agre and Chapman, 1990).

Moreover, roles and scope of plans are shaped and bounded by the form of planning systems. The systems comprise a series of 'procedures for formulating plans and determining applications for development' (Healey & Shaw, 1993, p. 769). Also, the power of plans 'depends on the authority given to it in formal law', as the operation and range for systems are affected by 'the culture which gives them life' such as government policy, local interpretation, professional attitudes, institutional orientation, and management skills (Booth, 1995, p. 103; Cullingworth et al, 2015, pp. 85-86; see also Booth, 1993; Healey & Shaw, 1993). Booth (1995, p. 103) displays that 'In all planning systems that involve public control of public sector development there is a tension between the desire to maximize certainty and the desire to allow maximum flexibility'. Given certainty and flexibility, there are two distinctive accounts of planning systems by a number of researchers (see Healey, 1994; Booth, 1995;

Tewdwr-Jones, 1999; Tait, 2002; Bäing, and Webb, 2020). On the one hand, regulatory planning systems like in the United States provide relatively more certainty than discretionary mechanisms with 'written constitutions and administrative law', 'relying less on political judgment and particularly less on individuals' discretion' (Tewdwr-Jones, 1999, p. 249; see also Booth, 1995; Cullingworth, 2002). Under such regulatory approach to development control, development proposals are determined in line with a set of 'preordained regulations' outlined in a master or zoning plan (Booth, 1995, p. 103; see also Healey, 1994; Tewdwr-Jones, 1999; Cullingworth, 2002; Bäing, and Webb, 2020). In this regard, 'Certainty is guaranteed since a blueprint is produced in advance of decisions.' (Tewdwr-Jones, 1999, p. 249), but MacGregor and Ross (1995, p. 58) point out that 'too much certainty' could restrict 'creativity'.

On the other hand, by comparison, discretionary planning systems are more flexible 'to react to situations' like in the United Kingdom (UK) (Tewdwr-Jones, 1999, p. 249; see also Booth, 1995; Booth, 1999; Tait, 2002). Under such planning mechanisms, the 'eventual' decisions on development schemes are 'left partially unconstrained by prior regulation' (Booth, 1995, p. 103). In particular, the planning system in the UK is not only discretionary and flexible but also hierarchical 'from national to local levels' and, since 2012, further to community level with 'each tier of local government (and thus planning) accountable to higher levels of administration' (Tewdwr-Jones, 1999, p. 244). Each local authority is required to produce a development plan with discretion 'as opposed to conformity' in preparing development plans and their policies (MacGregor and Ross, 1995, p. 58; see also Tewdwr-Jones, 1999; Tait, 2002). However, such discretion is framed or limited by national government policies and statues (Tait, 2002). It is worth noting that the discretionary planning systems are 'not particularly accountable' and provide no guarantee whether development plans to be actually used or not (Tewdwr-Jones, 1999, pp. 248-249). In addition, each planning application 'is determined on its merits', since 'there is no legal requirement for decisions to follow policies automatically' (Tewdwr-Jones, 1999, p. 249).

Development plans act as the framework 'which prioritize certain criteria and actions over others, and which provide a point of reference for those making subsequent decisions', as Healey (1994, p. 41) describes (see also Healey & Shaw, 1993; Healey, 2013; Cullingworth et al, 2015). In 'the discretionary nature of the British planning system', however, planning decisions are significantly dependent on the capabilities of key actors (Tait and Campbell,

2000, p. 490; see also Tewdwr-Jones, 1995), since the central government provides 'little specification' through 'policy instruments' such as National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG) (MacGregor and Ross, 1995, p. 41). As for plan-making, planning officers as producers at local planning authorities (LPAs) typically lead the preparation in producing a development plan such as local plans before the introduction of neighbourhood planning (NP). Developers and landowners actively participate in the plan-making process in order 'to ensure that their Interests are properly protected' (MacGregor and Ross, 1995, p. 53; see also Chance, 1999), while citizens are merely 'consulted' (Healey, 1994, p. 46). When it comes to the use of plans in the decision-making system, developers as applicants and LPAs as decision-makers are the principal actors (Tewdwr-Jones, 1995; Tait and Campbell, 2000). The developers refer to development plans in producing their planning proposals to gain permissions, as their schemes are required to comply with the plans. Planning officers and elected members of the planning committee at LPAs use the plans to assess planning applications in decision-making, while 'only a very few make it through the courts' (MacGregor and Ross, 1995, p. 50; see also Tewdwr-Jones, 1995; Tait and Campbell, 2000).

Determination of planning applications in the UK depends significantly on perception, attitude, inclination, stance, and relationship of decision-makers at LPAs and their discretion in interpreting policies in use, since the LPAs have 'administrative discretion rather than legal rule' (MacGregor and Ross, 1995, p. 41; see also Healey, 1994; Tewdwr-Jones, 1995; Tait and Campbell, 2000). For this, Tewdwr-Jones (1995, p. 171) notes that 'Policies should be clear but interpretative; they must state expressions of intent but allow a certain amount of flexibility for individual judgements to be applied in different cases'. This implies that such discretionary planning systems enable plans to 'exacerbate uncertainty among user groups' (Tewdwr-Jones, 1999, p. 249).

This section has discussed the nature and role of typical plans within planning systems. The next section will explore role and work of a new level and type of participatory development plans produced by voluntary citizen planners within the hierarchical and discretionary planning system in England, focusing on the implementation of neighbourhood development plans (NDPs), as Albrechts (2003, p. 250) illustrates 'Planning needs a fine-grained analysis of what actually takes place in formal decision-making and implementation, in the transition

from plan to formal adoption of the plan and in its actual implementation, as opposed to what they normatively would like to see happen (see Friedmann, 1998)'.

3.3 Communicative work of development plans

This research aims to analyse the roles and effectiveness of NDPs post-adoption in practice. For this, the idea of the communicative work of development plans developed by Healey (1993) is deployed as a conceptual framework for analysing the operation of development plans through the interactive social relations they establish. It is axiomatic that effective plans are crucial to all planning work and play an important role in the structure of the planning system in England. Healey (1993) argues that, traditionally, development plans was considered as directive statements and fundamentally authoritative documents. Under this model, planning authorities exercised control power by using 'scientific knowledge' and 'consensus goals' to intervene and control development through plans that set out what was to be built as instructed (Healey, 1993, p. 83; Murdoch, Abram and Marsden, 1999, p. 192).

The interaction between planning and society/ites has begun to draw attentions in liberal democratic contexts, responding to a shift from a representative democracy to a more direct or participatory democracy (Sturzaker, Sykes and Dockerill, 2022). The 'command and control' form operating on the basis of a scientific rationalism has therefore since been gradually replaced by an interactional model of the relationship between planning authorities, planners, developers, communities, and various groups and actors 'concerned about the spatial organisation and design of places' (Healey, 1993, p. 83).

Within this 'more pluralist' approach, plans may 'be seen to perform different roles within different relationships' and planners may 'construct plans which combine different messages to different "audiences"' (p. 83). Plans may accordingly 'mean different things to different groups' (p. 83). In short, planning, plans, and planners may have 'a highly interactive relationship with their external environment' (Murdoch, Abram and Marsden, 1999, p. 192). As Mazza (1986) suggests, plans therefore need 'to be understood in the context of relations external to the plan' given the nature of plans that 'are the product of interactive contexts'

(Healey, 1993, p. 83). For this, plans can be seen as an arena of argumentation and struggle 'with different interests competing to determine its content' (Healey, 1993, p. 84). As for analysis of communicative work, Healey concentrates on texts and systems of meaning within a plan itself (Tait, 2002) in particular during plan-making processes (Healey, 1993; Murdoch, Abram and Marsden, 1999).

On the roles of a development plan, Healey (1993, p. 100) describes that 'a development plan is the product of processes of interaction between a range of parties, and in turn becomes an object, a point of reference, for continuing interactions'. This implies that the 'made' development plan becomes not just a statutory part of a legally defined planning framework but also a living document which continuously interacts with its external environment and can influence social relations beyond those involved in the production of the plan. For example, approved plans may exercise persuasive power over the activities and perceptions of actors who are involved in subsequent rounds of plan-making or decision-making. For the purposes of this research, Healey's (1993) conception of the communicative work of development plans needs to be altered in order to understand the 'actual' use and work of adopted neighbourhood scale development plans in their interactional context. This will be further discussed in the next section.

3.4 Communicative work of neighbourhood development plans

In the context of the English planning system, neighbourhood planning (NP) ostensibly enables citizens to guide developments and shape the areas where they live and work. As neighbourhood development plans (NDPs) are mainly produced by local people to deal with locally sensitive planning issues, a large number of NDPs have different types and forms in different areas (Parker et al., 2014; Parker and Salter, 2017; Salter, 2021). As set out in chapter 2 above, once they pass an examination and referendum, NDPs become part of the statutory development plan and are therefore used for planning implementation within neighbourhood areas (NAs). In principle, NDPs are consequently used in decision-making on

planning applications since they must be made in the light of the 'development plan', comprising local plans (and the London Plan in London) and any NDPs in areas where they exist, and any other relevant material considerations (Planning and Compulsory Purchase Act, 2004). For decision-making, NDPs are considered in parallel with 'other relevant planning policies set at local and national levels', although NDPs have to comply with such higher planning policies under the hierarchical planning system in England (Salter, Parker, and Wargent, 2022, p. 2). Approved NDPs can also have an influence on subsequent local plans just as an existing local plan affects their preparation.

Understood within the context of the discretionary planning system in England and within the framework of the communicative work of development plans, the meaning and intentions that provisions of NDPs seek to articulate are liable to be reshaped and reworked by actors during implementation phases, due to the scope for pluralist interpretation, and ongoing contestation. It may accordingly cause disparities in interpretation and perception of NDPs between the groups who produce them and those who subsequently read and use them, since a message in a plan could be 'encoded and transmitted, received and decoded' by diverse actors (Freeman and Maybin, 2011). This intimates that NDPs could be 'shaped and altered for instrumental reasons by all parties involved' (Parker, Lynn, and Wargent, 2015, p. 532). After NDPs are adopted, neighbourhood planning groups (NPGs) who lead the production of NDPs have little guidance as to their status and roles post-adoption and no formal roles in determining whether and how NDPs are subsequently upheld and actually used, either in decision-making or the development of subsequent local plans. That is, they also have no rights or clearly defined place to defend their original intentions during implementation phases. NDPs contain policies for the development and use of land, ostensibly in line with the concerns and aspirations of local communities. They can therefore be seen to implicitly represent and promise to realise their agreed objectives. However, there is no guarantee about the extent to which NDPs will be taken into account post-adoption. Instead, the primary role in the implementation of NDPs will be played by LPAs and, to a certain extent, developers. This situation seems to result in a need for NPGs to continue working to ensure the effective use and realisation of NDPs.

To understand how this works in practice, both the complexity of the hierarchical structure of planning policy and the entanglement of the 'actors, institutions, and interests involved'

need to be considered (Salter, Parker, and Wargent, 2022, p. 18), as various external factors 'legitimately influence actual development' due to the discretionary nature of the planning system in England (Salter, Parker, & Wargent, 2022, p. 3; see also Parker et al., 2019). In this regard, post-adoption NDPs become effective through the relations they are able to influence or establish with their external environment including the planning and development processes, planners, communities and other actors involved shaping change to the areas covered by NDPs.

Following the literature review in chapter 2 above, NDPs can be seen to have an interactive relationship with three broad external processes namely: other tiers of planning policies, development management mechanisms related to applications for planning permission, and the roles of those who prepare NDPs. Firstly, NDPs co-exist with local plans produced by local planning authorities (LPAs) in neighbourhood areas (NAs), while NDPs have to conform with policies in higher tier plans to be adopted. This means that NDPs will interact with the communicative work of local plans in various ways over time. Secondly, as part of the formal development plan NDPs have a privileged role in evaluating applications for planning permission, adopted NDPs must legally be considered by stakeholders in the preparation and evaluation of planning applications (even if little weight is ultimately placed on them). It is worth noting that the perception and attitude of actors is therefore crucial in decision-making within the discretionary planning system in England. Due to the uncertainty that this generates for the implementation of NDPs, despite having no formal role beyond adoption, the activities of NPGs therefore remain important in trying to steer, guide and influence the interpretation of an NDP.

As discussed in the preceding chapter, NDPs have distinctive characteristics and attributes compared to other development plans such as local plans or previous iterations of community-led plans. In terms of the analytical framework for this research, Healey's (1983) concept of the communicative work of development plans needs to be adjusted to investigate the work and impact of NDPs within the English planning system, by both reorienting the type and scale of development plan and expanding the range of the approach. As for the type of development plans, this project focuses on the communicative work of NDPs which are made by communities and deal with planning affairs at the community level. Healey's (1993) cases were related to Unitary Development Plans and District Development Plans all of which had

not yet been formally adopted as draft versions (also see Murdoch, Abram, and Marsden, 1999). This allowed Healey's study to explore the 'soft' or communicative power of plans even pre-adoption but her study did not assess differences between draft as opposed to adopted versions of plans (Parker, Lynn, and Wargent, 2015). Also, the cases chosen for her study were all formally prepared by professional planning organisations. It is therefore important to consider how the fact NDPs are prepared by local people as citizen-planners rather than planning professionals changes understandings of the plan and its role. While noting that planning officers and consultants are somewhat involved in the preparation of NDPs, it is still relatively unusual and a striking feature of NDPs that the organisations who produce them have such a limited role in their subsequent implementation and use. Adopted NDPs are selected as cases for this thesis, since it is therefore crucial to analyse whether and how the policies in 'made' NDPs are actually used and applied in decision-making, how they influence subsequent local plans in practice and how the NDPs consequently influence determination and 'subsequent material changes to the built environment' (Wargent and Parker, 2018, p. 397).

When it comes to the approach being taken here, the concept of 'communicative work' in this project is directly equated to the actual 'performance' of a development plan, given the ways their continuous interaction with their external environment shapes the power and influence they exercise, beyond the content included 'in' plans themselves. Healey's study of the communicative work primarily concentrated on a reading of the textual language and internal meanings and messages within plans themselves. However, this is insufficient to analyse the 'interactional' and persuasive roles of development plans and therefore the effectiveness of NDPs in the real world of practice, since external conditions are relatively more crucial to the performativity of plans than the mere existence of policies in NDPs per se. This means that 'NDPs need to be considered as part of a dynamic, complex and changing system' (Salter, Parker, and Wargent, 2022, pp. 17-18; see also Parker et al., 2018). For example, planning applications are normally determined by LPAs in line with the provision of development plans and other material considerations. Their attitude and interpretation are therefore highly influential in determining the weight afforded to NDPs in the discretionary planning system in England. This research accordingly focuses on the interaction of development plans with external factors in order to understand the actual use of NDPs,

addressing what elements influence the interaction of NDPs with their external environment, how such factors in turn influence the effectiveness of NDPs, and exploring actors' perception and interpretation of NDPs. That is, this research aims to identify what external elements NDPs interact with and examine both how such external factors affect the plan and how the plan simultaneously affects the world it seeks to influence. The following subsections describe the interaction of NDPs with key external elements surrounding the plans within planning contexts.

3.4.1 Interaction between local plans and neighbourhood development plans

NDPs, as part of the statutory development plan, have an interactional relationship with other plans within the hierarchical planning system. To be specific, NDPs should contribute to 'the delivery of strategic policies set out in the Local Plan or spatial development strategy'; and guide and shape 'development that is outside of those strategic policies' (National Planning Policy Framework (NPPF), 2021, p. 7). This implies that the approach and strategy within the local plans produced by LPAs may circumscribe the content and scope of NDPs (Salter, 2021) or limit the value of NDPs 'as key issues are already addressed' (Parker et al., 2017; Salter, 2021, p. 41). For example, LPAs could allow planning proposals to come 'forward potentially against the wishes and needs of the local communities' (Stanton, 2014, p. 273). Such external conditions, including complex interdependencies between planning policies and entanglement with various actors involved in local plan production and implementation therefore shape the extension and limitations with respect to the scope of the NDP.

NDPs can also, however, influence the production or revision of subsequent local plans (Parker and Salter, 2017), but their power to do so depends on the approach and provisions of local plans as well as the attitudes and orientations of LPAs towards NDPs (Salter, 2021). There is currently less evidence how NDPs influence local plans and vice versa, or how NDPs affect the perceptions and activities of actors who have power to produce or influence the policies in local plans.

It is noteworthy that the timing of development plans plays a crucial role here, as emerging plans are likely to undermine existing plans (Salter, Parker, and Wargent, 2022). The effectiveness of NDPs relies on their relationships with local plans but it is always uncertain

whether emerging local plans strengthen or undermine the range of policies and content in NDPs. This means NDPs have ‘a limited lifespan’ due to the potential for subsequent local plans to supersede the policies they set out and consequently to potentially undermine the NDPs and the effort and energy of the community that produced it (Salter, 2021, p. 42; see also Bogusz, 2018). Equally, however, a well-timed NDP may be able to influence revisions to an emerging local plan. In this regard, the effectiveness of NDPs depends on timing, as the timing of local plans can undermine (or potentially enhance) their influence in decision-making (Salter, Parker, and Wargent, 2022). Hence, there is a need to explore how policies within local plans and NDPs reflect each other; the extent to which LPAs take the NDPs into consideration during the revision of local plans, and; how the timing of production affects the effectiveness of NDPs.

3.4.2 Work of neighbourhood development plans in decision-making

NDPs play an interactive role in decision-making processes, and are engaged with by a range of relevant actors within the hierarchical and discretionary planning system. Once an NDP becomes part of the statutory development plan, the NDP should have a range of effects on planning applications and decisions in the locality (Bradley, 2019). In other words, NDPs can in principle have a crucial material impact on determination of planning permission in NAs, since applications should comply with the development plan unless other material considerations indicate otherwise (Planning and Compulsory Purchase Act, 2004; Parker, Salter and Dobson, 2018; Salter, Parker, and Wargent, 2022).

The degree of the effectiveness of NDPs in decision-making nonetheless relies on the perception and attitudes of decision-makers within the discretionary planning system in England (Salter, 2021; Sturzaker, Sykes, and Dockerill, 2021). Applicants, local people, NPGs and particularly decision-makers within LPAs (and the Planning Inspectorate) are key actors that can influence the determination of planning proposals (Tewdwr-Jones, 1995; Tait, and Campbell, 2000). Each of these acting groups has different forms and levels of authority and power. Where these different actors have different perceptions and inclinations toward NDPs, they may consequently reinterpret or reshape the original intention and meaning of provisions in NDPs originally articulated by citizen-planners (Wargent and Parker, 2018). Thus, actors can (re)shape the range and use of NDPs in the preparation and assessment of planning

applications.

Determination of planning applicants can also affect the subsequent relevance and revision of NDPs. Subsequent iterations of NDPs are likely to reflect decisions made on planning applications in order to remain relevant and capable of effectively influencing development activities. They may also impact on the motivations for participation of local people in NP, shaping the ways they hope to impact on development schemes within NAs. NDPs are therefore taken into account in decision-making, and in turn the results of determinations potentially affect the subsequent modification of NDPs. It therefore is valuable to identify the communicative performativity of NDPs, exploring the extent to which NDPs are taken into consideration during processes of decision-making; what perception and behaviours those who are involved in decision-making have towards NDPs; and whether and how results of decision-making influence the subsequent NDPs.

3.4.3 Work of neighbourhood planning groups post-approval

The effectiveness of NDPs is related to the intentions and actions of those who prepare them. Uncertainty and unpredictability about the work and use of NDPs therefore generates potentially ongoing activities for NPGs who lead the preparation of NDPs on behalf of communities. 'Community' is regarded as a key acting group since an NP ostensibly enables them to shape the development and growth of their area. Rhetoric from central government has frequently claimed that the decentralisation of decision-making is leading to the improvement of participation of local people in the planning system under localism (Parker et al., 2015; Sturzaker and Shaw, 2015; Parker and Salter, 2017; Sturzaker and Gordon, 2017; Wargent and Parker):

'[NP] gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need. Parishes and neighbourhood forums can use neighbourhood planning to: set policies through neighbourhood plans to determine decisions on planning applications' (DCLG, 2012, para. 183);

'[NP] provides a powerful set of tools for local people to ensure that they get the right types of development for their community' (DCLG, 2012, para. 184).

Some researchers accordingly point to the significance of communities in the preparation of NDPs (Salter, Parker, and Wargent, 2022), but also note concerns about the potential dissolution of NPGs after the adoption of plans (Cowie and Davoudi, 2015; Locality, 2018). Despite the emphasis on public participation in NP, as discussed already, there is a lack of studies with respect to the status and role of communities in the implementation stages, despite the fact that it is necessary to begin with happenings 'at delivery/recipient level' for investigation of implementation (Barrett, 2004). In NP, communities, including NPGs, uniquely are both citizen-planners and those directly affected by NDPs. That is, NDPs are produced by local people who in turn are directly affected by their (non) implementation.

After the adoption of NDPs, parish/town councils or neighbourhood forums (NFs) have received less attention from academics with research focusing on the substantial time and energy they invest to lead and co-ordinate the process of preparing NDPs. Town/parish councils already exist regardless of neighbourhood planning (NP) in general, with the councils mostly establishing a working or steering group to produce the plan (Locality, 2018). NFs, on the other hand, face even more substantial challenges to ensure the intentions and aspirations in their NDPs are realised in practice since they are set up chiefly to produce the plan. It is even known that many forums disband once a NDP is completed (see Cowie and Davoudi, 2015; and Locality, 2018).

In other cases, however, those who produce NDPs seek to secure continued backing for the provisions in a NDP. However, no standardised or specific guidance for NPGs post-adoption is available, despite the fact that NDPs are living documents that shape the development and growth of NAs on an ongoing basis. This has led to some political debate about the effective power of NDPs. Some LPAs suggest that NDPs are influential in the determination of planning schemes, however, some communities feel NP has more limited power than the rhetorical statements in central government discourse suggests and accordingly feel 'the need to strengthen the influence of NP' in determination of planning permission for the future of their areas (Parker, Lynn, and Wargent, 2015, p. 525; Salter, Parker, and Wargent, 2022, pp. 15-16; pp. 17-18; see also Wargent, 2021). In this sense, they demonstrate a willingness to be involved in decision-making in order to realise their ambitions and aspirations beyond plan-making or any narrow desire to protect 'existing property values from erosion by unwelcome development' (Bradley, 2019).

Following Healey's (1993) logic, the policies within plans are likely to be interpreted and utilised differently by different readers and users during the process of decision-making and the revision of local plans, potentially undermining the original intentions and meanings of the people who produced NDPs (Wargent and Parker, 2018; Salter, Parker, and Wargent, 2022). The ongoing role of NDPs in decision-making and local plan production therefore creates a necessity for NPGs to continue their work to monitor and press for NDPs to work as they intended. The importance of this can be seen by evidence of some communities raising grievances about the insufficient reflection of NDPs in decisions taken on planning applications (Parker, & Wargent, 2022). Evidence also suggests some communities have been concerned about the ways policies in NDPs can be overlooked in decision-making (Salter, Parker, and Wargent, 2022). This leaves the question of who ensures that NDPs are fully taken into consideration where there can be no guarantee or assurance about whether, or the extent to which, NDPs will be sufficiently upheld and used in the implementation stages. Thus, people may be right to retain some scepticism about the value of NP given the ambiguity and uncertainty surrounding the performativity of NDPs and their power to realise the visions and objectives of communities in practice.

Prevailing power asymmetries also exist between actors involved in the determination of planning permission. LPAs normally decide whether planning applications are approved or not, whilst LPAs must refer to NDPs alongside local plans as part of the development plan for in decision-making purposes (Salter, 2021; Sturzaker, Sykes, and Dockerill, 2021). The extent to which NDPs are taken into account in practice depends significantly on the attitudes and orientation of LPAs (Salter, 2021). In terms of both the determination of planning schemes and the review of local plans, LPAs have considerable authority, power and discretion to support either local plans or NDPs, whilst NPGs have only very limited opportunities to plan against unwanted decisions. In this respect, NDPs can be regarded as 'a negotiating tool' for local people (Brownill, 2017, p. 151; Wargent and Parker, 2018, p. 389), but used as 'a decision tool' by LPAs (p. 397). If NDPs are insufficiently taken into account by actors such as applicants and decision-makers, communities may no longer regard NDPs as a functional and effective way to achieve their aspirations. This ultimately signifies a need for NPGs who can effectively influence the operation and use of NDPs.

The relationship between LPAs and local people 'varies from case to case' but better

communication is frequently considered as an effective way to reduce disparities in interpretation and perspectives (Wargent and Parker, 2018, p. 384; p. 397; see also Salter, Parker, and Wargent, 2022). This implies that NDPs on their own are limited in their capacity to persuade or influence the perception and stance of other actors and therefore that communities are implicitly expected to play a key, ongoing role if they want to ensure the efficacy of NDPs they have invested time and energy into. However, there is still lack of empirical evidence regarding what better communication actually means, how it works, and whether it in turn actually influences the determination of planning applications rather than merely enabling the development of improved relationships within the planning system. In methodological terms, this can be studied by comparing the relationships between actors and communities with the actual use of NDPs during the process of decision-making.

NDPs are also likely to need to be revised in order to adapt to changing planning circumstances, including revised national and local planning policies or shifting attitudes of government, as discussed in the previous chapter. Revision may reflect the work and effectiveness of existing NDPs in influencing the determination of planning applications and the subsequent local plans. They may also help reduce ambiguity and controversies in interpretation discovered post-adoption. Furthermore, even where a coherent plan has been produced, scepticism may remain among communities, planners, developers or other actors who the plan interacts with. Revisions can offer a way of responding to such scepticism where 'planners must always be looking for ways to boost the persuasive powers of their development plans' (Murdoch, Abram and Marsden, 1999). In this regard, the effectiveness of NDPs depends on the willingness of local communities to engage in ongoing, long-term participation as much as it does the policies in NDPs per se (Salter, Parker, & Wargent, 2022). Thus, NDPs induce NPGs to keep working beyond the preparation stage, while the effectiveness of NDPs in implementation phases relies on the capacity of NPGs to secure continued backing for the provisions in the plan. As a result, a series of questions are raised about the status and existence of NPGs after the adoption of NDPs: whether NPGs continue or disband after the production of NDPs; whether and how NPGs seek to ensure that the NDP is fully upheld and used in practice; how NPGs effectively engage in decision-making (Salter, Parker, & Wargent, 2022); and the extent to which their activities in turn influence the effectiveness of NDPs in decision-making, subsequent local plans and other developments.

Thus, NPGs as planners and supporters are key elements in shaping the performativity of NDPs and their effective power to shape implementation.

3.5 Summary

This chapter has scrutinised the idea of the communicative work of development plans developed by Healey (1993) to establish a conceptual framework for the thesis as a means of exploring how NDPs interact with wider planning contexts post-adoption. Development plans play a significant role in the planning structure and system in England, and have a continuous, interactive relationship with the social contexts that surround them. That is, plans are not prepared in isolation and do not have any autonomous power outside of the contexts in which they are used. They always coexist with other plans, interact with planning processes and actors, and have dynamic relationships with others planners and others involved in shaping their implementation. This chapter has somewhat re-designated the concept of the communicative work of development plans to fit the distinctive attributes of NDPs and this research's particular focus on communicative work and plan-implementation. As we have seen, NDPs are a relatively unique type of plan both in terms of their status and role and their production by 'citizen- planners'. The thesis aims to analyse the 'practical' work and 'actual' use of the 'made' NDPs in reality rather than just their internal and inter-textual meaning, focusing on the interactions between adopted NDPs and the external environment, rather than the emerging versions of plans studied by Healey (1993). In this regard, this chapter had identified three key external factors which can be seen to be most influential in the work and effectiveness of NDPs, including other coexistent plans and policies, decision-making processes and the perception and attitudes of relevant actors within them, and the continuous roles and activities of NPGs. Building on this analytical framework, the next chapter will set out and elucidate the methodology and methods adopted for this research.

4. Methodology and Methods

4.1 Introduction

The previous chapters have explored neighbourhood development plans (NDPs) within the planning system of the UK (Chapter 2) and generated a theoretical framework (Chapter 3) to address gaps within existing research and to meet the aim and objectives of this research in relation to the role of the plan post-preparation. The following chapter aims to set out the methodology and methods to answer the research questions which were posed in Chapter 1. In terms of the structure, this chapter begins with the overall research approach to achieve the aims of this study in line with the theoretical framework. It then moves to identify the research design and to define the selection of cases to draw out evidence and findings. Research methods for this study are discussed with regard to approaches to collection and analysis of the empirical data during the course of the fieldwork phase. The latter part of this chapter sets out the ethical considerations for this research design and practices, and the positionality of the researcher throughout the process of this project.

4.2 Overall approach

This project assesses the work which NDPs do post-preparation, focusing on the content and intention of NDPs, their relations to other tier plans, effects on planning applications and decisions, and the roles and actions of neighbourhood plan groups (NPGs). Decision-making processes within the English planning system are comprised of a set of actions and reactions of a variety of actors. Their behaviours, perceptions and interpretations affect the performativity and effectiveness of NDPs, the determination of planning applications and further shape places where local people live and work. In this regard, NDPs need to constantly interact with external environments, as Healey describes the plan is the product of these interactive contexts (1993; Murdoch, Abram and Marsden, 1999).

Furthermore, knowledge is regarded as indeterminate and non-definitive in a pluralist society, since there are the differentiations and diversities between people and objects of the natural sciences and in social phenomena and their meanings (Bryman, 2016). In this context, a development plan is related to different aspirations, interests, expectations, and perspectives of different actors (Healey, 1993). This research therefore adopts an interpretative understanding of social action and social actors in the social world in creating a version of social reality (Bryman, 2016).

For this study, Healey's communicative work is deployed as it offers a framework for interpreting and understanding the contemporary and complex social phenomenon of neighbourhood planning (Healey, 1993; Yin, 2009). This analytical framework is suitable to probe a neighbourhood 'development plan' which interacts with and in turn is influential in shaping planning regulations, local planning authority behaviour, wider planning policies, planners, subsequent developments and ultimately the living environment of local communities. Therefore, it is valuable to understand the underlying mechanisms of NDPs in the real world. Given the concerns of the research, the thesis adopts both qualitative and quantitative approaches to interpret the NDPs in various perspectives, using inductive reasoning.

4.3 Research design

In order to address the research issue, the empirical research is focused around the following principles:

- The research will focus on detailed case-studies of specific NDPs to analyse their impact in its local context. This raises the research issue of what case-studies to select and why, and indeed how many case-studies to undertake given the time and resources available.
- Within those case studies, at the core of the research is the task of mapping the distinctiveness of the NDP as prepared and its subsequent impact through systematic in-depth analysis of planning decisions. This will enable the research to examine whether and how the NDP has influenced decision-making.

- However, it is also important to understand the process of NDP preparation to understand its distinctive policies (or the absence of distinctive policies) and also to understand how it was used (or not) in subsequent planning decisions, and this will be achieved by interviewing key people and organisations involved in NDP preparation and planning decisions.
- The research is also interested in the legacy of NDP in relation to the perceptions and attitudes of those involved, and again this will require interviews (or sections of interview) with key actors involved in NDP preparation.

The research will therefore use a range of document analysis and qualitative interviews in a mixed methods approach based on selected case studies. The following sections outline the methodology for the study, explaining the rationale for choosing four case study NDPs and the techniques used to analyse the impact of the plan and perceptions of the NDP implementation phase.

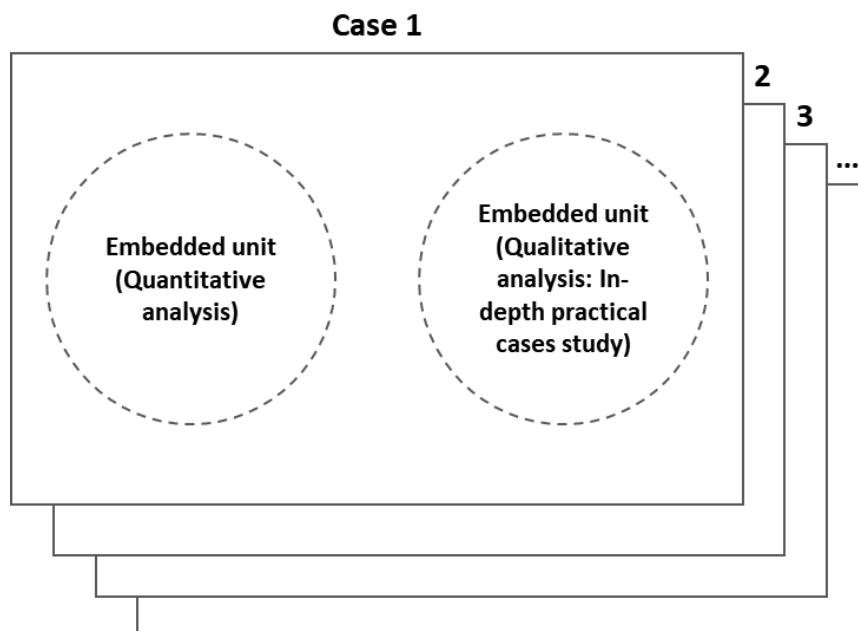
4.3.1 Case study research

Given the research aims, objectives and questions, this study employed a multiple embedded case study methodology. This thesis focused on the best match between the research questions and methods is significant factor, as no universal research designs exist to deal with all cases (Flyvbjerg 2006, p. 231). Case studies can contain a vital element of narrative to investigate the complexities and contradictions of the social world (Flyvbjerg, 2006). Furthermore, case studies have a distinct advantage when how and why questions are being generated; the research has little or no control over events; and the study is on a contemporary phenomenon within a real-life context, as Yin noted (2009). The aim of this research is to identify the impact and work of NDPs and roles of Neighbourhood Plan Groups (NPGs), and to interpret the interaction of the NDPs themselves and with their external environments from a variety of directions. The implementation of NDPs comprises a contemporary set of decision-making behaviours directed by the perceptions of key actors under a circumstance over which the researcher has little control. In this regard, the case study approach is suitable given the relative strengths and weaknesses of other research designs in light of this research aim and the analytical framework. In addition, while the conduct of a multiple (or comparative) case study mostly tends to require more extensive time and energy in comparison to single-case designs, the evidence from multiple cases is considered more generalisable, 'more compelling' and 'more robust' (Herriott and Firestone,

1983; Yin, 2009, p. 53).

For this research, moreover, each individual case contains subunits (embedded units) including both qualitative analysis and quantitative analysis (see Figure 1) in order to seek information at a different level of analysis and aspects, and to assess different research questions (Creswell, 2009; Yin, 2009). To be specific, the impact of each NDP is scrutinised through one main unit with two subunits: 1) One main unit: the general assessment of NDPs and NPGs on implementation, 2) one subunit: qualitative analysis for a series of more in-depth ‘embedded’ practical cases of decision-making processes to enable this research to examine key issues and decisions, and 3) another subunit: quantitative analysis with regard to the use of NDPs by key actors. In short, two embedded units are part of the findings of each main case (Yin, 2009). In this regard, this study needs to collect multiple types of data and resources simultaneously through both quantitative and qualitative research. By doing so, the investigator ‘can gain perspectives from different types of data or from different levels within the study’ (Creswell, 2009, p. 215). To achieve this, cases were carefully selected for this study as follows.

Figure 1 Multiple embedded case study design



4.3.2 Selection of cases

In order to examine the impact and performance of plans, the study needs to be based on areas that have approved NDPs. Given the time and cost limitations, it is practically impossible to investigate and compare all NDPs in England during the PhD. The number of cases chosen is therefore considered under the limited time, cost and geographically commutable distance, as a considerable amount of time is required to scrutinise each case study in detail. In this regard, cases were selected in the light of the validity and research questions under the criteria. The criteria were established with influential characteristics which might have an impact on the effect and work of NDPs and the roles of neighbourhood plan groups (NPGs) who are involved in the production and implementation of the NDPs. In terms of case selection, this research set forth the criteria for the selection of cases as follows.

- NDPs formally approved
- NDPs prepared by different neighbourhood planning groups (NPGs) such as town councils and neighbourhood forums
- NDPs with different local characteristics e.g. purposes of NDPs; local planning authorities (boroughs); planning hierarchy; urban and parished areas; attributes or orientations of local communities

Firstly, cases are NDPs which are successfully adopted and form part of the statutory development plan in order to investigate the implementation of NDPs, since the NDPs formally approved are influential in development and planning activities in the neighbourhood areas (NAs). Secondly, NDPs selected are established by different types of neighbourhood plan groups (NPGs). The NDPs are mostly prepared by two types of qualifying bodies, town or parish councils (often through a working/steering group) or by neighbourhood forums (NFs). Whilst town or parish councils are pre-existing groups, the NFs are instituted newly and purposively for the purposes of preparing a NDP. The latter are generally in urban areas where neither parish or town councils exist. Unlike town or parish councils, the NFs are not automatically retained after the adoption (see more Chapter 2). For this study, cases were chosen to enable investigation of each type in order to compare their roles and work in implementation stages. Lastly, each case has distinct attributes under different contextual conditions. Considering them, this thesis identifies and discusses how NDPs work differently in different planning environments such as visions of local planning

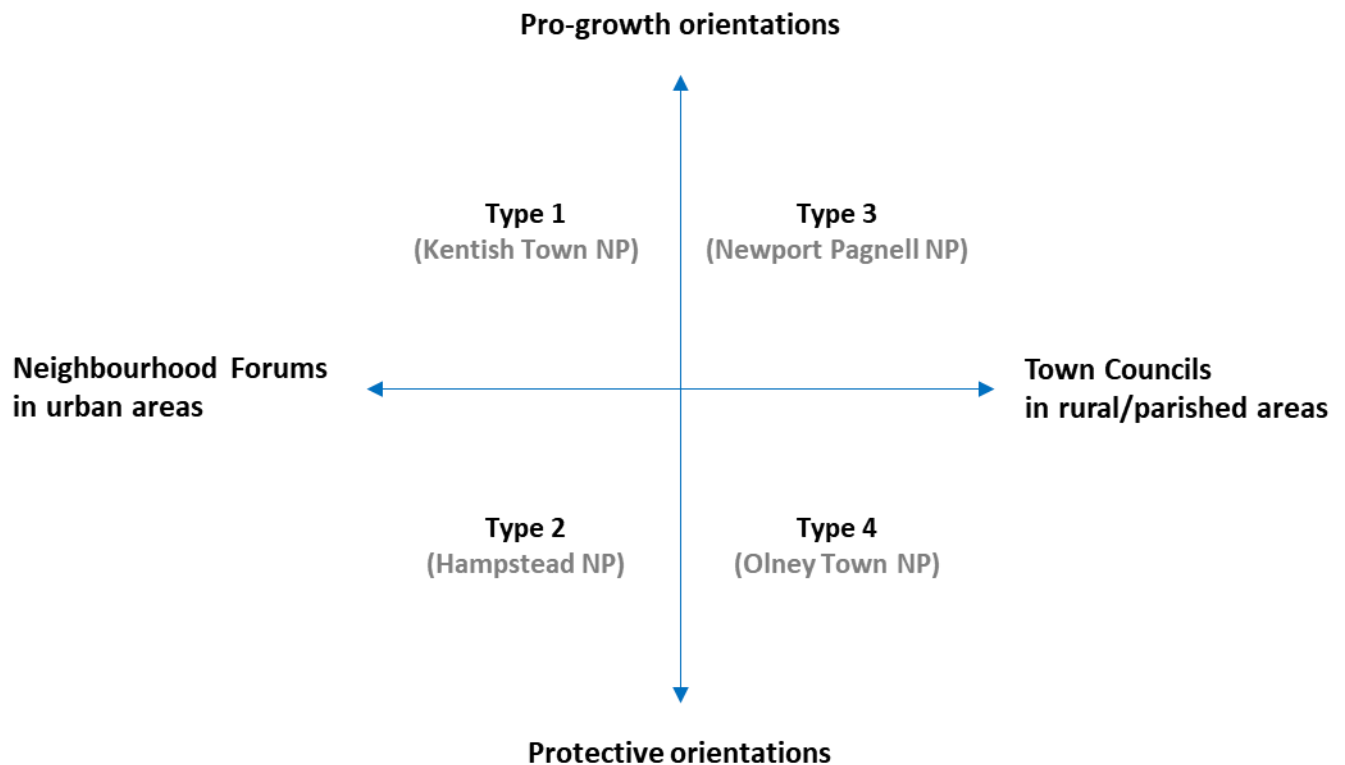
authorities, the interaction with local plans, and inclinations of local communities (see Table 12).

By doing this, the selected cases meeting these criteria enables the research to critically compare and examine the impact and work of NDPs with empirical evidence, focusing on the research questions of this project (Chapter 1, page 4) and communicative work as a theoretical framework (Chapter 3): what elements affect NDPs to be more or less influential; how NDPs interact with wider planning policies such as local plans; how key actors perceive and use the NDP in the preparation and assessment of development proposals; how their perceptions and interpretations of NDPs change over time; and in turn how the NDP impacts on decision-making and subsequent development activities; and whether and how the NPGs seek to ensure the NDP is actually upheld and used after the adoption of the NDP.

The four selected cases

The research selected four cases to explore the practical performance of NDPs with empirical evidence. Four types are set out on a 2 x 2 matrix in the four quadrants (see Figure 2). Each type is broadly distinguished by the characteristics of NDPs and the inclinations of NPGs, while they complement one another. The matrix describes both one for town or parish councils in a rural/parished area and the other for NFs in an urban area. The matrix also indicates both one seeking to develop their area (mostly economic growth) and the other pursuing to maintain the status quo. It is significantly noted that those are relative terms, since the nature of neighbourhood 'development' plans should not promote less or anti- development 'than that identified in the local plan for the local area' (Locality, 2018). The resulting four types of NDPs for case studies are set out Pro-growth NFs (Type 1), Protective NFs (Type 2), Pro-growth Town Councils (Type 3), and Protective Town Councils (Type 4). This matrix is therefore valuable to distinguish the characteristics of NDPs to identify similarities and differences of the cases, considering the different contextual conditions under different planning environments. Four specific NDPs were chosen in line with the criteria above and the types, as follows.

Figure 2 Types of neighbourhood plans for case studies



Boroughs - Camden and Milton Keynes

Camden and Milton Keynes (MK) were selected to cover the criteria set out in above, given the cost and commutable distance relatively close to London, where the researcher lived when the empirical research was conducted. The sufficient data was required to investigate the perception and interpretation of key actors, since more cases can be more generalisable. It was assumed that the active LPAs may have abundant experiences and cases with regard to the implementation of NDPs; and might be easier and more accessible for the interviews.

By February 2020, London and MK were two of the three most active urban areas in terms of the adopted NDPs with Leeds: 17 in Leeds, 18 in MK and 18 in London. The total number of NDPs in London has increased to 23 as of November 2021, and Camden was the most active borough with 7 NDPs. The London Borough of Camden is one of 32 boroughs that constitute London without parished areas. The borough of MK is the largest settlement in Buckinghamshire and is situated approximately 70 kilometres from the north of London. MK comprises a fully parished area, consisting of the city of MK and, outside the city, a rural area

with settlements and villages. These two boroughs consist of a variety of well-developed and developable areas. Each neighbourhood plan within boroughs has its own vision and policies to deal with locally unique concerns and aspirations.

Type 1: Kentish Town Neighbourhood Plan (KTNP)

Kentish Town is an urban area and geographically located to the mid-north-east of the London Borough of Camden and close to Central London. Kentish Town has faced loss of business and office and retail space, and a lack of affordable housing, while Kentish Town has some conservation areas where there is limited land available to build new dwellings. Notwithstanding several adversities, the area has potential opportunities through the high accessibility, and the presence of large, re-developable industrial lands. While neighbourhood plans in Camden have rarely designated sites for spatial developments, local communities in Kentish Town decided to produce their own NDP to achieve their goals, particularly to protect the function of business and retail through tailored policies including allocated sites for a variety of development activities. In this regard, the KTNP is regarded as pro-development. Kentish Town Neighbourhood Forum (KTNF) and Kentish Town Neighbourhood Area (KTNA) were officially designed in 2013, since there is no Parish or Town Council. The KTNP was formally produced on 19 September 2016, as the second in Camden and the fifth in London.

Type 2: Hampstead Neighbourhood Plan (HNP)

Hampstead is situated to the north of Camden and has attractive and historic places. Hampstead is well-developed area with listed buildings and almost entirely covered by the designation of conservation areas. However, Hampstead has faced a lot of pressure on development through the addition of basements, as relatively few sites are therefore left for development. Consequently, this tendency causes tensions resulting from the adverse impact of construction. The local people are also concerned about excessive traffic which worsens air quality. Accordingly, local people sought to manage developments and to shape the future of their area through their NDP to address such concerns. In consequence, Hampstead Neighbourhood Forum (HNF) and Area (HNA) were designated in October 2014 and Hampstead Neighbourhood Plan (HNP) was adopted in October 2018.

Type 3: Olney Town Neighbourhood Plan (ONP)

Olney Town is located approximately 19 kilometres from Milton Keynes City. The town is one of the Key Settlements and is a rural area outside the city. Milton Keynes Council (MKC) has sought expansion and accordingly expected Olney Town to build additional houses. The town council has been pressured to build more housing than the town expected since they were unable to block the housing developments set out in the Core Strategy of MK. People in the town raised the concern that the extra housing developments could undermine the historic identity of the area and the capacity of infrastructure such as school, GP surgery, and transport. In addition, local people were concerned about the cost of housing and the shortage of small and affordable housing in the Olney Town area. In 2013, Olney Town decided to produce their NDP in order to protect the character of their area from speculative developments, to control and shape the growth of the area, to provide affordable housing and to manage local issues raised by communities. Olney Town Neighbourhood Plan (ONP) was officially adopted in 2017.

Type 4: Newport Pagnell Neighbourhood Plan (NPNP)

Newport Pagnell is a town and civil parish in the Borough of Milton Keynes and is located in the north-eastern part of the Milton Keynes urban area. The town is the largest of the three Key Settlements in Milton Keynes alongside Olney and Woburn Sands. Newport Pagnell Town Council (NPTC) was keen to preserve the character their area, but MKC allocated new dwellings to rural areas including Newport Pagnell and Olney. Like Olney Town, local people in Newport Pagnell raised concerns that infrastructure would be adversely affected by extra housing. Regardless of the preference of Newport Pagnell, however, the town was unable to block additional housing allocated by MK as local planning authority (LPA) and had to accommodate additional dwellings to help meet the housing target of the LPA. Hence, Newport Pagnell undertook to manage this circumstance via their own NDP rather than resisting development. Thus, contrary to most areas having NDPs, NPNP set forth a different approach by allocating much more housing than the requirement of the Core Strategy in order to secure for the benefits to the town and local people through planning obligations from a range of development activities. Newport Pagnell Neighbourhood Plan (NPNP) was successfully approved in 2016 and revised in 2021.

4.4 Research methods

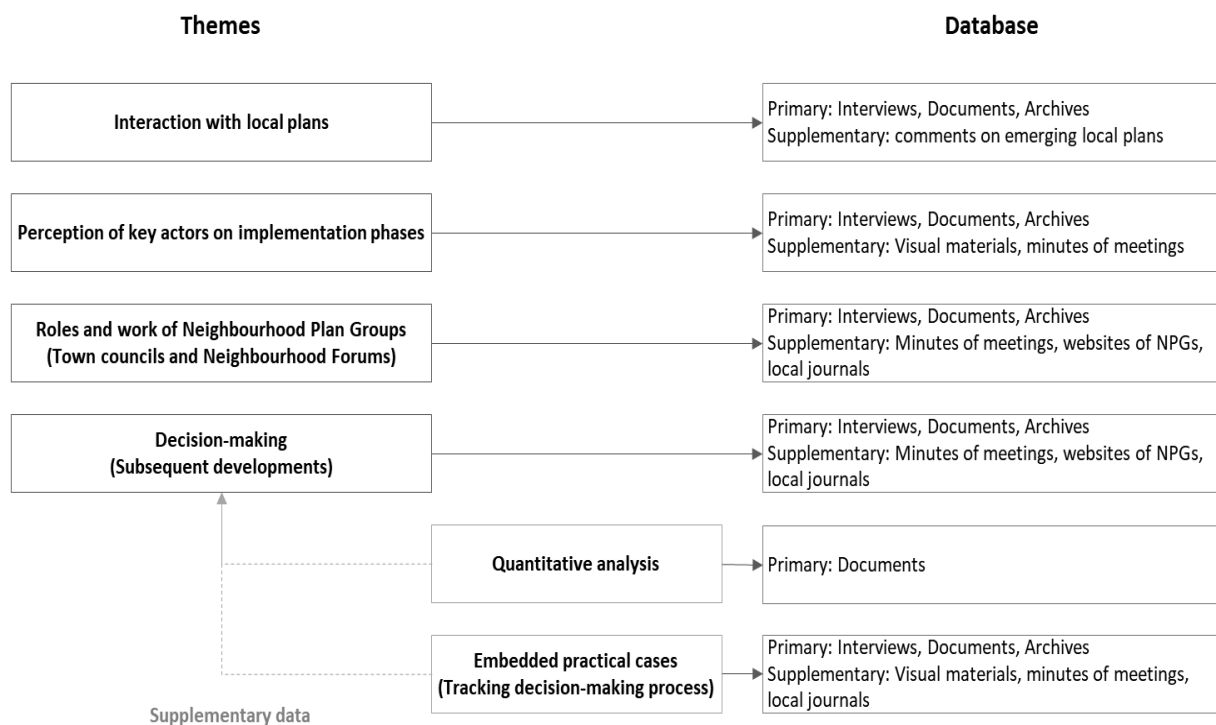
This section sets forth the mixed-methods for the data collection and analysis within the multiple embedded case study approach in the course of the study. Qualitative analysis is mainly as a primary database; and both qualitative and quantitative analysis are a secondary dataset which plays a supporting role in a comprehensive analysis (Creswell, 2009; Yin, 2009).

4.4.1 Data collection

As the case study's distinct virtue is its ability to address a full variety of resources and evidence, the empirical data therefore comprises three parts for this research (see figure 3):

- a) An in-depth case study of core actors' views relating to the implementation of NDPs with data drawn from 29 semi-structured interviews across the four cases;
- b) Quantitative data from an analysis of documents with regard to decision-making processes;
- c) Documentary analysis for the embedded practical cases, based on combining interviews and documents to trace how the NDPs have been used in the implementation.

Figure 3 Primary and supplementary data collection



Interviews

As to primary data and resources, semi-structured interviews were conducted with those deeply involved in the four NDPs and their implementation, including councillors of town councils, members of neighbourhood forums (NFs), planning officers at the local planning authorities (LPAs), elected councillors of the Planning Committee, and developers as planning applicants. An initial list of potential interviewees was set to efficiently conduct the fieldwork.

In terms of the selection of respondents, this research tracked particular planning applications and their decisions within neighbourhood plan areas (NAs) to interview those who were involved in decision-making in order to trace how NDPs are implemented and used and to investigate how key actors' perception and interpretation of the NDPs change over time. Town councillors and members of NFs are key actors for this investigation, since they are involved in the production of NDPs and in turn are affected by the NDPs. Contact details of town councillors and NFs were provided via their own websites. The information of councillors on the Planning Committee as decision-makers were also accessible online, since all members of the committee were listed on the website of each authority.

Finding developers and planning officers was a substantial challenge at the beginning of the fieldwork, since there was a lack of specific information as to who was involved in planning applications and decisions 'within' neighbourhood areas (NAs). Hence, they were identified and chosen on the basis of the data of quantitative analysis which comprises the set of planning applications and decisions within each neighbourhood area. For the quantitative analysis (discussed further below), the planning proposals and reports of planning officers were sourced from the planning portal of each borough in order to gain contact details of key actors including names, positions, and/or email addresses, as they were normally provided on relevant documents such as application forms, reports of planning officers or decision-notice. In addition, the investigator inversely retrieved the information with their name and position through websites of boroughs and search engines online such as Google. During the course of fieldwork, the interviewees were asked to suggest other possible participants, as a snowball method.

The framework and questions of the semi-structured interview were designed to help interviewers to focus on the specific topic, but also to be sufficiently flexible to answer the

research questions, based on the literature and the analytical framework, i.e., communicative work, (Chapter 2 and 3) (Bryman, 2008). In other words, the interview comprised common and bespoke questions for locally-specific issues of each NDP. Potential interviewees listed were approached with research invites through email, but each email was individually tailored to each recipient in line with their particular role, position and involvement in particular planning practices. The email briefly included an outline of the research, the process of the interview, the selection of the recipient, and the request to participate in this research. A reminder was carefully sent two weeks after the first access to those who did not reply. When they agreed and expressed their willingness to participate in the study, a second email was sent out with an information sheet and consent form and they were asked to choose a time, place and medium for the interview under the national lockdowns during the coronavirus pandemic.

In total, 219 invites were approached normally twice to be interviewed but only a small number of respondents agreed to participate in the research. A variety of issues affected the number of interviews. Firstly, a relatively small pool of potential interviewees for each NDP case had been deeply and consistently engaged in the implementation of NDPs, in particular, with regard to the decision-making process, the production of the local plan, and the production of NDPs. Secondly, certain key gatekeepers controlled access, and led some potential respondents to defer to other 'key figures'. For example, unlike councils, contact details of relatively few members of the committee of a NF are provided on their website. It was therefore hard to access to the members of forums once particular members of the committee refused requests to participate in the research. Thirdly, members of organisations had frequently passed the requests on to other colleagues who were more deeply involved in the research topics. Fourthly, some respondents declined, as they were busy with other tasks; other colleagues had already participated; or they had left positions or jobs. Others did not reply to an invitation at all. Lastly, as the most effective factor, the lockdowns for the pandemic of COVID-19 overlapped with the period of the fieldwork for this research. The national lockdowns and restrictions in the UK between March 2020 and March 2022 had a huge impact on the research in particular for interviews, since the fieldwork was undertaken from February 2020 and the expected research period was consequently delayed and extended. At the beginning of the coronavirus (COVID-19) outbreak, it was unavoidable that

all interviews arranged were cancelled, given the limited period time for fieldwork. However, although a small number of respondents participated in each case, this challenge was able to be mitigated given the total of 'four' cases.

The fieldwork lasted around 24 months, beginning in February 2020 and concluding in February 2022. In sum, 29 interviews were conducted across the four cases via face-to-face (mostly before the pandemic), on the phone, or through online meeting programmes such as Zoom or Teams, with two exceptions of written interviews. These interviews varied in length, and most of them lasted between approximately 20 to 75 minutes (with one exception of only around 7 minutes), averaging 43.27 minutes for 27 oral interviews. The interviews provided a rich database with regard to the views and experiences of interviewees relating to the use and effectiveness of NDPs in practice.

Documentary data

The documents for this study were utilised not only for the context and questions of interviews, but also for the practical cases study and the quantitative analysis. They are based on documentary evidence and data including NDPs, examiners' report on the draft of NDPs, Local Plans, officers' reports, consultation responses of consultees on development proposals, planning applications, decision notices and, in some instances, minutes of planning committees and appeal decisions. The findings from this research are contextualised in the light of literature reviews on decision-making practices of development plans. The key documentary data is NDPs which were successful at referendum and approved, and have been used in the determination of planning permission and the subsequent revision of local plans, in order to explore what contents NDPs have, how they are upheld, and how they affect planning applications and decisions in practice. Local Plans are also significant resources to investigate how the local plan reflects the NDP, and how the NDP influences its subsequent local plan. In addition, the study used secondary sources as supplementary data including academic journals and official documents such as practitioner reports, journal papers, professional papers, local press, media and social media. Visual materials were also explored as indirect observation resources with regard to the meetings of the Planning Committee through webcast and YouTube of both boroughs.

Documentary data for practical case studies

The aim of embedded practical case study design with archival information is to describe how the NDP has been used and interpreted by stakeholders at key stages throughout the decision-making process in practice. Controversies or conflicts were, in this sense, substantial elements in order to identify explicitly the extent to which the NDPs impact on the determination of planning proposals, and how different actors perceive and interpret the NDPs on the grounds of their arguments in relation with the intentions of local communities. For example, planning applications, consultation responses and planning officers' reports are useful to explore the views and perspectives of developers, consultees, local people and decision-makers. The decision-making events were selected in line with the information through interviews, quantitative data and local press. Interviewees frequently provided particular developments as examples positively or negatively.

The quantitative data shows in which applications the NDPs were actively cited by key actors to produce and assess, and this allows the assumption that the NDP played an influential role in the determination of the development proposals. Local newspapers, in this sense, were useful resources to figure out the outline of such local issues and contexts. The practical case studies were therefore conducted on the basis of comprehensive data combining both documents and interviews. Complementary evidence was also used such as minutes of town councils, NFs, and the Planning Committees. Visual materials in the form of recording with respect to the meetings of the Committee were supplementary data to refer to the atmosphere of meetings, representing an indirect observation approach.

Documentary data for quantitative analysis

Data for quantitative analysis for this research was drawn from documents and archives to identify how NDPs are 'formally' used in the determination of planning applications, since this approach aims to examine the degree to which NDPs and their policies have been practically used by different actors at key stages of decision-making processes. Planning applications have to be fully decided regardless of approval or refusal, as the quantitative analysis investigates how NDPs are used throughout the whole process of decision-making. In addition,

the research time set the year of the adoption of NDPs, since some developers and decision-makers already considered the emerging NDPs. It was also a valuable point for this study, since this implies how NDPs have an impact on emerging planning applications and the perception of actors. Making a list was a significant challenge in data collection for the quantitative analysis. The list of planning proposals was established through maps from the planning portal of each borough. It was a huge time-consuming task to select applications, since boundaries of neighbourhood plan areas (NAs) were not designated on maps of the planning portals and it also needed to click each application on the map and then verify whether the application had been fully decided. In particular, an extra issue was that there were sometimes several applications on any one individual site.

Relevant documents from the decision-making processes were scrutinised to establish whether NDPs were cited, which policies were quoted, and who mentioned them at what stages. In this regard, the number of citations and references are key factors, including planning applications, consultation responses of statutory consultees and local people, reports of planning officers, decision notices and, in some instances, minutes of planning committees and appeal decisions. This dataset focused on quantity rather than contents, but this qualitative gap is filled by both the interviews and the practical cases study. In the end, the mixed methods are beneficial to comprehensively explore the impact of the NDP from various angles. The data collection was conducted on Excel programmes, since this was suitable to mark the count and to extract the quantitative results on the table with visual charts. Moreover, given the different production dates of NDPs and the different scales of areas, the number of proposals on lists varied. The scale was therefore shifted from the number to the proportion in order to efficiently compare them across cases.

4.4.2 Data analysis

Data analysis across the case studies relied in order of priority on interviews with key actors and documents for practical cases study and quantitative analysis. The collected and analysed data was consequently used to form the structure of the following two chapters.

Interviews

Data collected via 29 semi-structured interviews were transcribed for data analysis. The transcription of responses from each interviewee was a time-consuming task but helpful for a familiarity with the collected and recorded data. The data transcribed was broken down and thematically coded in accordance with categories stemming from research questions (Chapter 1), the literature (Chapter 2), and the analytical framework (Chapter 3). Categories included various actors' perceptions and considerations of NDPs on decision-making practices, the interaction between the NDP and local plan, and NPGs' approaches to ensure their aspirations and intentions for NDPs were realised in practice. This analytical approach then concentrated on similarities, differences and/or patterns across each case in order to compare effectively. Each quotation was able to have multiple codes where the answers of participants covered several interview questions. In terms of an analytical tool, data was manually coded and analysed with Microsoft Word programme rather than an electronic programme such as NVivo. It was felt that the manual work has more flexibility to review the collected data and to easily move quotations between themes and categories for the researcher. Moreover, it was effective in terms of opportunity costs, as Bryan pointed out that 'it is probably not worth the time and trouble navigating' new software for a small set of data (2012, p. 608).

Documentary analysis

Document analysis is useful for most case studies, since it provides specific insights and information for further exploration (Yin, 2003). For this research, the documents were variously utilised for the contexts and questions of interviews, the practical cases study, and the quantitative analysis. The interpretation was a key task for the analysis of documents with regard to the NDPs themselves and their policies, and their interaction with external environments such as local plans or documents regarding planning applications and decisions, consultation responses, reports of planning officers, and minutes of the meetings of NPGs and the Planning Committee. Documents analysed were also used inform interviews and for evidence in embedded practical case planning applications. Documentary resources provided contextual information and outlines of planning activities as explicit evidence. Interview

questions therefore were adapted on the basis of the data from documents. For this, the documents were scrutinised thematically rather than chronologically. For the investigation of the embedded practical cases, however, the documents were dealt with chronologically during the analysis phase. In particular, the exploration of practical cases is based on both documents and interviews (with visual materials employed as indirect observation data).

Quantitative analysis

This research employs quantitative analysis to examine the extent to which NDPs and their policies have been taken into account by different actors at the key stages during the decision-making processes, by tracking the citations and references of them on relevant documents. The table was set to show the list of applications selected, the range of documents at key stages, the number of references and citations, and the kind of policies quoted, using the Excel programme. On the basis of the quantity, the visual charts were created to clearly describe and compare when the NDP has been cited, who has used the NDP, and what policies have been used (See more Chapter 5.4.5, 5.5.5, 6.3.5, and 6.4.5). The figures of the measure are based on a percentage in order to compare easily cross cases.

It is noted that the categories of documents are different by each borough. For example, public responses and consultation responses are separately marked by Milton Keynes, while they are integrated into consultation responses at Camden. For this study, consultation responses of residents at Camden have been separately investigated on purpose in order to compare cases by similar categories. Furthermore, town councils and neighbourhood forums are defined as statutory consultees in both boroughs, but they have been separately scrutinised from other consultees in order to explore whether and how NPGs as plan-making groups works after the adoption of NDPs.

This quantitative approach is valuable to mitigate contradictions between statements of interviewees and their actual actions or behaviours, as this research method is considered as relatively explicit evidence. An expected risk of interviews was that participants may provide untrue, overstated, or understated responses which could consequently affect the outcomes of the research. When it comes to the limitation, however, this quantitative approach

addresses only the numbers rather than the qualitative content of NDP citation. This may cause distortion. For example, actors may not directly cite NDPs in their comments, while they might take the NDP into account. In this regard, other qualitative analysis including both interviews and the embedded practical cases study are valuable to triangulate and supplement the findings to fill this 'loophole' in the quantitative analysis.

4.4.3 Limitations of research methods conducted

The key limitations of the research methods chosen are related to the relatively small sample of interviews and their unbalanced representativeness. The issue regarding the number is specifically discussed in section 4.4.1 above. Another limitation is the representativeness of samples, while this research initially intended to deal with all relevant stakeholders in a balanced way across the whole decision-making process this proved impossible. As mentioned above, access to local residents was limited due to gatekeeper behaviour and the national lockdowns. Also, planning applicants mostly refused or did not reply with the exception of one developer. However, whilst participants were unbalanced in the light of positions and roles, interviews were conducted with most core members of acting groups at key stages of decision-making, including: Town councillors and neighbourhood forums (NFs) who are plan-makers and are affected by NDPs, planning officers and councillors of the Planning Committee as decision-makers and one developer as an applicant for planning permission. Future research focusing on developers who prepare proposals within neighbourhood area and/or local residents who are affected by neighbourhood plans may be valuable.

4.5 Ethics statement and positionality

Research ethics

Before any fieldwork began, this research considered a set of ethical principles and procedures as part of securing ethical approval through the University of Sheffield. The

researcher is accordingly required to take the impacts of the research on the participants into account during the process of this project. At the first contact, the initial invitation email contained a brief description relating to the purpose of the research, the reasons for the selection of potential interviewees, interview questions and length, and the beneficial contribution of interviews. An information sheet as a brief outline of the study was also attached in advance (see Appendix 1), comprising: an introduction from the researcher; an explanation of the research, process and questions for interviews; details about how responses and information shared would be treated, including confidentiality and anonymity regarding identifiable personal data, and contact details for the researcher and supervisors as well as Head of Department. By doing so, the potential interviewees were able to make an informed decision about their participation in the research. For this, participants in this research is can be seen in Appendix 3. This research uses acronym of position as codes rather than names of interviewees given anonymity: PO (Planning officer), TC (Town Councillor), DEV (developer), PC (a member of the Planning Committee), and NF (a member of Neighbourhood Forum). This enables readers to understand at what position participants respond to interview questions but precludes them to identify personal and sensitive details of interviewees.

At the beginning of the interview, the participants were reminded with regard to the audio recording and the completion of a consent form (as explained through the information sheet provided prior to interviews). At the end of the interview, the consent form set out in Appendix 2 was provided to be signed. The form contains how their comments and shared information are used and addressed. When interviewees raised extra requirements that their responses not be directly quoted or used by other authorised researchers, those were carefully accepted and reflected in the research. In the course of the interview, in particular, the researcher did not intervene in responses of interviewees and did not express any of their own personal views in order not to influence their comments or opinions, maintaining a degree of neutrality as far as feasible.

Reflecting the researcher and issues of positionality

Positionality of researchers can be directly and indirectly influential in the research, since ‘the

qualitative research is interpretive research' (Creswell, 2009, p. 177). The reflexivity of the researcher is influential in the process of the study due to one's preferences, positionality, assumption, preconceptions, values, ideology, biases, and personal background such as culture, history and socioeconomic status. Creswell (2009) points out that such characteristics of researchers may affect and shape the interpretations formed during research. This project was reflected mainly by the academic education, working experience and social background of the researcher.

The researcher studied urban planning for a bachelor's degree in the Republic of Korea (South) and, after working at planning institutes, completed an MSc in urban and regional planning at the University of Birmingham. The researcher then conducted various planning research projects as a consultant for the public sector in Korea. In successive projects, the investigator recognised that local areas face complex and locally specific problems. However, Korea has a lack of any planning system at the community scale like neighbourhood plans, as most public institutions and private firms still tend to resolve the local issues with larger-scale approaches such as urban and regional planning. The researcher had planning knowledge and experience but was unfamiliar with planning policies at the community level within the planning system in the UK. In this sense, during the process of this study, the researcher as an international student has initially faced challenges in understanding the overall system of the UK and the process of data collection in investigating another country such as hierarchical organisations and administrative systems, stakeholders and procedures during plan-making and decision-making processes, rooted historical and political contexts, social background, personalities of those who live and work in the UK, networking, how to access information such as planning portal and contact details of potential interviewees and languages. However, the researcher has been able to learn from trial and error and overcome those challenges with the advice of the supervisors. In this context, the investigator may relatively investigate the NDPs themselves and their planning performativity with fewer biases objectively.

4.6 Summary

This chapter has described the methodological research approach and research design with

the strategies of data collection and analysis in line with the literature review and analytical framework (Chapters 2 and 3). Multiple embedded case study design with the mixed-methods is employed to address research questions (Chapter 1) in order to interpret and scrutinise the effectiveness and performance of NDPs and the roles of NPGs in practice. This chapter has also identified and selected four cases which are scrutinised through the following two Chapters: Kentish Town Neighbourhood Plan and Hampstead Neighbourhood Plan of Camden in Chapter 5 and Olney Town Neighbourhood Plan and Newport Pagnell Neighbourhood Plan of Milton Keynes in Chapter 6. In Chapter 7, commonalities and differences of findings from the empirical research are discussed in order to answer the research questions (Chapter 1) using Healey's communicative work as the analytical framework established at the start of thesis in Chapter 3.

5 Neighbourhood Plans of Camden in London

5.1 Introduction

The preceding chapter (Chapter 4) set forth a frame to collect and analyse data in order to effectively answers the research questions (Chapter 1). Based on that method, the empirical case study explores four neighbourhood development plans (NDPs) through two chapters (Chapter 5 and 6). For the case study, four selected plans are classified according to two boroughs since each borough has distinctive planning contexts such as planning hierarchy, neighbourhood planning groups (NPGs) as citizen-planner organisations and cultural and geographical contexts (see more Chapter 4): Kentish Town (KTNP) and Hampstead (HNP) Neighbourhood Development Plans in the London Borough of Camden (Chapter 5) and Olney Town (ONP) and Newport Pagnell (NPNP) Neighbourhood Development Plans in Milton Keynes (Chapter 6).

This chapter scrutinises Kentish Town and Hampstead neighbourhood plans which were produced by respective neighbourhood forums (NFs) in an urban area. This chapter firstly outlines planning environments at city and borough levels. This enables an understanding of the status and role of NDPs within their broad external conditions which will positively or negatively bound and limit work of NDPs. Then, this chapter critically investigates the performance and impact of Kentish and Hampstead NDPs in detail, identifying and exploring: local planning conditions and the motivation and aspiration of local community for NDPs, the roles and activities of NFs before and after the adoption of the plans, the preparation of the NDPs, the approach of key planning policies and their distinctiveness, the interaction of NDPs with the wider planning framework, the extent to which the NDPs have been used during the decision-making process and the production of local plans, and the perception and interpretation of actors towards the NDPs. In particular, as part of the analysis, the chapter tracks particular planning applications throughout the process of decision-making, tracing

how the NDP is used by key actors at key stages and investigating how they perceive and interpret policies of the NDP.

5.2 Context of London

London is the capital of the UK and its population was around 9.00 million in 2019 which is around as 16% of England. In London, planning is ‘the joint responsibility of the Mayor of London and the 32 London boroughs, the City of London Corporation and the Mayoral Development Corporations (MDCs)’ (of which there are two: the London Legacy Development Corporation and the Old Oak Park Royal Development Corporation in 2021) along with neighbourhood forums (NFs) designated by local planning authorities (LPAs) of London (London Plan, 2021, p. 3, para. 0.0.9).

The London Assembly Planning Committee has published three reports to assess the progress and challenges relating to neighbourhood planning in 2012, 2014 and 2020. Adopted neighbourhood development plans (NDPs) have gradually increased in London but varies between boroughs (London Assembly Planning Committee (LAPC), 2020). The total number of adopted NDPs was 16 in February 2019 and increased to 28 as of April 2023 (Table 1) (Neighbourhood Planners.London, 2022). There were 78 designated NFs in London, while ‘more than 110 communities had expressed an interest in developing a neighbourhood plan’ in 2019 (LAPC, 2020, p. 11). As of 2021, 14 of the 33 boroughs including 32 London boroughs and the City of London had adopted NDPs. It is worth noticing that seven of the 28 adopted NDPs are in Camden.

Table 1. Adopted neighbourhood plans by boroughs in London (April 2023)

	Area name	Inner/ Outer London	Adopted Neighbourhood plans			If cross-boundary: name of other Boroughs
			2022 09	2021 .11	2021 .08	
1	Barnet	Outer London	3	1	1	Harlesden plan - Old Oak and Park Royal Development Corporation
2	Brent	Outer London	2	2	2	
3	Camden	Inner London	7	7	7	Highgate plan - London Borough of Haringey

4	Ealing	Outer London	2	2	2	
5	Haringey	Inner London	V*	V*	V*	
6	Kensington and Chelsea	Inner London	2	2	2	
7	Lambeth	Inner London	1	1	1	South Bank and Waterloo plan - London Borough of Southwark
8	Lewisham	Inner London	2			
9	Richmond upon Thames	Outer London	1	1	1	
10	Southwark	Inner London	V*	V*	V*	
11	Sutton	Outer London	1	1	1	
12	Tower Hamlets	Inner London	1	1	1	
13	Waltham Forest	Outer London	1	1	1	
14	Westminster	Inner London	5	4	2	
Total			28	23	21	
* 'V' means that one plan in another borough crosses this borough, as some neighbourhood plan areas cross more than two boroughs.						

‘The take up of neighbourhood planning has been lower in London’ than other areas in England (LAPC, 2020, p. 11). Over 1,000 NDPs have been produced in England by 2021, compared to 23 in London. This amounts to slightly higher than 2.17 per cent of the adopted plans in London, although London as the capital have approximately 16 percent of the population of England. The Committee therefore expressed that ‘London is severely lagging behind the country as a whole in terms of implementing neighbourhood plans.’ (LAPC, 2020, p. 13; see also LAPC, 2014). This implies that London faces the challenges in the progress and activities regarding neighbourhood planning.

The majority of NDPs across England have been produced by ‘already established’ parish or town councils which ‘make Neighbourhood Planning more straightforward’ (LAPC, 2020, p. 5; p. 13; see also Parker, 2015), for example, Olney Town Neighbourhood Development Plan (ONP) and Newport Pagnell Neighbourhood Plans (NPNP) which will be discussed in Chapter 6. However, like most urban areas in England, parish or town councils are absent in London with the exception of Queen’s Park which is the first parish council in London. In London, therefore, a new NF has to first establish and be officially designated by the LPA before the commencement of the preparation of the NDP.

London has a hugely diverse and transient population and the resultant 'cultural and demographic diversity' lead to substantial challenges for neighbourhood planning (LAPC, 2020, p. 5; p. 13; PO3; see also Tribillon 2014; Colomb, 2017). Such diversity and complexity would result in considerable challenges to constitute new forums and to compromise on new neighbourhood areas (NAs) (Colomb, 2017). In addition, London has 'a higher proportion of renters than the rest of the country, which often creates a more transient population, making it more difficult for people to be involved in plan making that takes four years or longer' (LAPC, 2020, p. 13). However, the London Planning Committee highlighted that 'neighbourhood forums have been designated and NDPs completed in a wide variety of different locations, geographically and economically' (LAPC, 2020, p. 13). Parker et al., (2014) pointed out that NDPs have been unevenly made across England due to the economic conditions of each area. As for London, however, the London Planning Committee highlighted in 2020 that 'there appears to be no correlation between the number of plans and the socio-economic position of the area' (see Parker & Salter, 2016), whilst the report stated in 2014 that 'More affluent communities had greater access to professional expertise to drive the formation of neighbourhood forums having an advantage over those with less capacity or history of community organisation.' (LAPC, 2020, p. 11).

Inevitably, you do get tensions around individual sites in terms of any kind of development allocations, perhaps, that's more contentious. I think in the early stages, one of the most difficult issues to reconcile is the identification of a neighbourhood area, and particularly in London, in terms of where the beginning and end of neighbourhood areas and boundaries go, is a source of tension because different groups will have different geographies and inevitably, they won't coincide neatly. People identify with different places or they have different perceptions of what their local neighbourhood is, so I would say that has been an issue that's been challenging. In London, it sometimes has taken two or three years just to agree the area before you even really start because you can't start the plan until you've got an area. I think, that has been the biggest issue and that's probably caused more tension than anything else. (PO3).

In addition, the unique and complex planning structure of London causes another challenge for development activities and the production of NDPs. London is the only part of the country with a distinct three-tier development plan system including regional, local and NDPs (London Plan, 2021). London Plan (2021) frequently emphasises that 'all' local plans and NDPs have to comply with the London Plan and ultimately seeks that those plans 'will help deliver the growth London needs' (London Plan, 2021, p. 3; p. 6).

The London Plan is legally part of each of London's Local Planning Authorities' Development

Plan and must be taken into account when planning decisions are taken in any part of Greater London. (London Plan, 2021, p. 3).

The London Plan does not preclude boroughs and NFs from bringing forward policies in their Development Plan Documents or Neighbourhood Plans that vary from the detail of the policies in this Plan where locally-specific circumstances and evidence suggests this would better achieve the objectives of the London Plan. ... The Plan provides the framework to address the key planning issues facing London, allowing boroughs to spend time and resources on those issues that have a distinctly local dimension and on measures that will help deliver the growth London needs. This includes: area-based frameworks, action plans and Supplementary Planning Documents, site allocations, brownfield registers and design codes, as well as supporting neighbourhood planning (London Plan, 2021, p. 6)

Within such hierarchical local government structure of London, local boroughs are located between the Greater London Authority and NFs. The fact that three levels of development plans exist, if there is a NDP, can cause significant ‘challenges when forming the NF and area, and during ongoing plan development’ with more development plans and their supplementary documents comparing to the rest of country (LAPC, 2020, p. 13; NF3). Consequently, due to the complexity, each borough may contain multiple different neighbourhoods and neighbourhood areas often cross boundaries of boroughs (LAPC, 2020). Despite of a range of distinctive planning context of London, Camden borough has approved the greatest number of NDPs in London. The next section investigates the stance and perspective of Camden towards NDPs.

5.3 Context of Camden

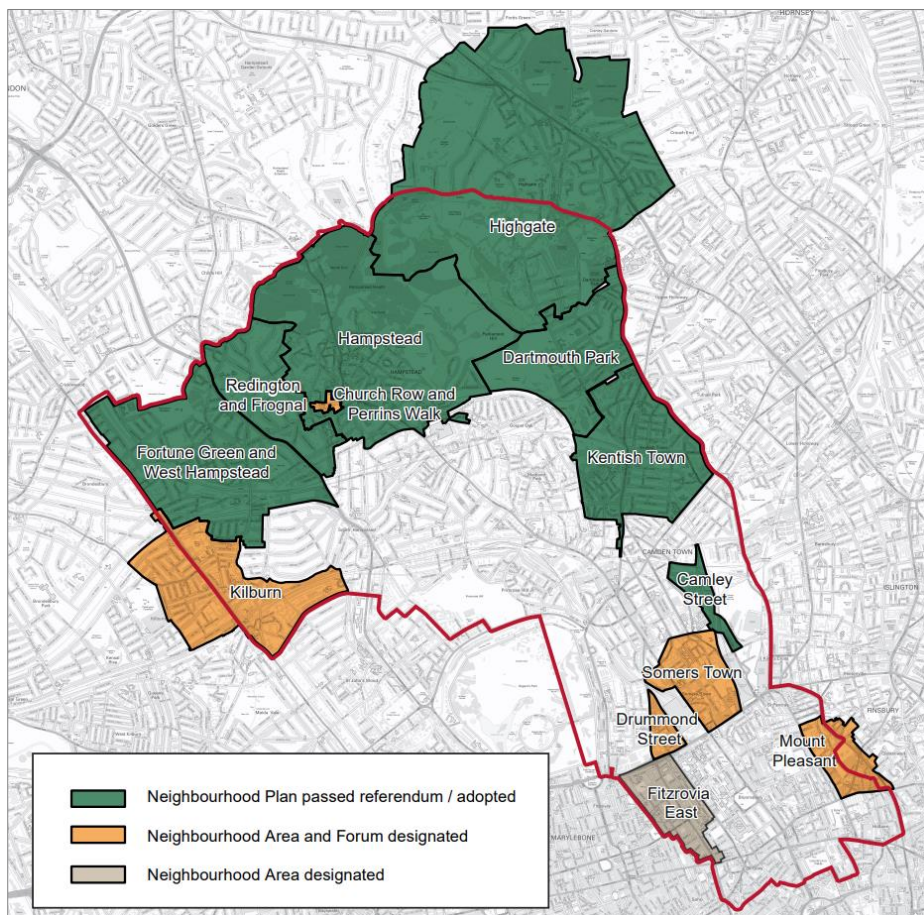
The London Borough of Camden is one of 32 boroughs that constitute London. Camden is located in Inner London and its southern reaches form part of Central London. Camden faces ‘significant change, with substantial population growth and increases in demand for housing and employment’ and accordingly seeks to provide home, jobs and other facilities (Camden Local Plan 2017, p. 16). Such issues unsurprisingly happen in different areas due to diverse economic and geographic environment. In economic terms, median gross household income in Camden was £36,053, approximately 17% higher than the London average of £30,700 in 2019, ranging ‘from £24,674 in St Pancras & Somers Town to £47,748 in Hampstead Town’ (Camden Profiles 2020).

Camden is one of the most active councils in London for neighbourhood planning (Table 1) (PO1). Thirteen NFs and areas are designated and seven NDPs have been adopted as of this writing in April 2023 (Camden, 2021). Planning officers of Camden described reasons why more NDPs have been produced than other boroughs in London: Camden is relatively more open for diverse views and its plan is relatively less restrictive; the LPA tends to reflect perspectives and opinions of the local people into their planning activities through their planning policy team who support to neighbourhood planning groups (NPGs); and a number of communities in Camden are interactive and keen to engage in decision-making on development activities (PO5; PO7; PO2):

People, I guess residents, they really are keen on protecting or trying to direct the kind of development where they want in their development as well. (PO5).

Camden is quite known for its vocal communities. People are really engaged with what happens in their neighbourhoods, they really want to know what is going on, they are keen to take part in applications and decisions. ... That might be a reason why people have actually the time and energy to spend time meeting together and having these discussions (PO7).

Figure 2 Camden neighbourhood planning map - August 2021



NDPs have their own character and objectives, including historic, progressive and unique areas in Camden (PO1; PO5). For example, Hampstead is well-developed and comprise a lot of terraced houses and modern flats, whilst Kentish Town is 'a balance of quite deprived areas and quite affluent areas' with a number of council estates (NF1; PO7). Accordingly, each NDP set out locally-specific policies within the interaction with distinctive planning contexts.

It is really because of how Camden itself is a very historic but also pretty progressive in some areas and how we want to progress the future of Camden and to include different bits and pieces of different areas of Camden. That creates a very open-ended plan (PO5).

Camden Council articulates the context and role of NDP in the local plan 2017 (Camden Local Plan, 2017). This statement of the council and the response of the planning officer (PO3) below seem that the LAP considers the NDP as a tool to realise goals of Camden Council, while the NDP may be regarded as the end per se for communities since the NF is designated only for the production of NDPs. This indicates a gap of perspectives and aspirations, aims, purposes, between LPAs and NPGs towards NDPs, since the local planning authority (LPA) uses the NDPs while local people produce NDPs and are influenced by the impact of the NDPs.

In terms of the local plan, the main difference was that we acknowledged the role of neighbourhood plans. The neighbourhood plans are here we have to take them into account in decision-making. ... Paragraphs 1.10 to 1.12, we just set the context there, but there are all these neighbourhood plans and they do form part of the development plan. ... We saw the neighbourhood plans as doing their own thing and nesting under the local plan, but broadly helping to achieve and deliver the local plan's objectives (PO3).

In addition, this rhetoric statement within Camden Local Plan seems to enable local people to influence subsequent development by establishing policies in NDPs, as their NDPs as part of development plan have to be considered in decision-making. However, this statement itself seems not to guarantee that NDPs will be fully taken into account.

Chiefly, I think, the conservation angle, so both environmental and heritage interest was a big part of it. Also, a desire I think in some of the communities to influence design and also the types of housing that come forward. I think in some parts of Camden there's concerns about the affordability of housing and the mix of housing that comes forward. That's also been part of the motivation. (PO3).

Notably, the planning department at Camden employs internal 'case conferences' to discuss and scrutinise particular cases between planning officers, since the majority of planning applications are generally complicated and bring conflicts, for example, regarding a lot of conservation areas, listed building and NFs. One planning officer recounted that it is

substantial to scrutinise and understand certain development or certain aspects (PO7), as interpretation plays a key role in decision-making given the discretionary planning system in England. This assumes that the planners at Camden are able to be more cautious to interpret and assess proposals in line with policies of developments from a variety of perspectives through the case conferences. According to the responses of one planning officer (PO7), this conference provides NDPs an additional opportunity to be carefully considered.

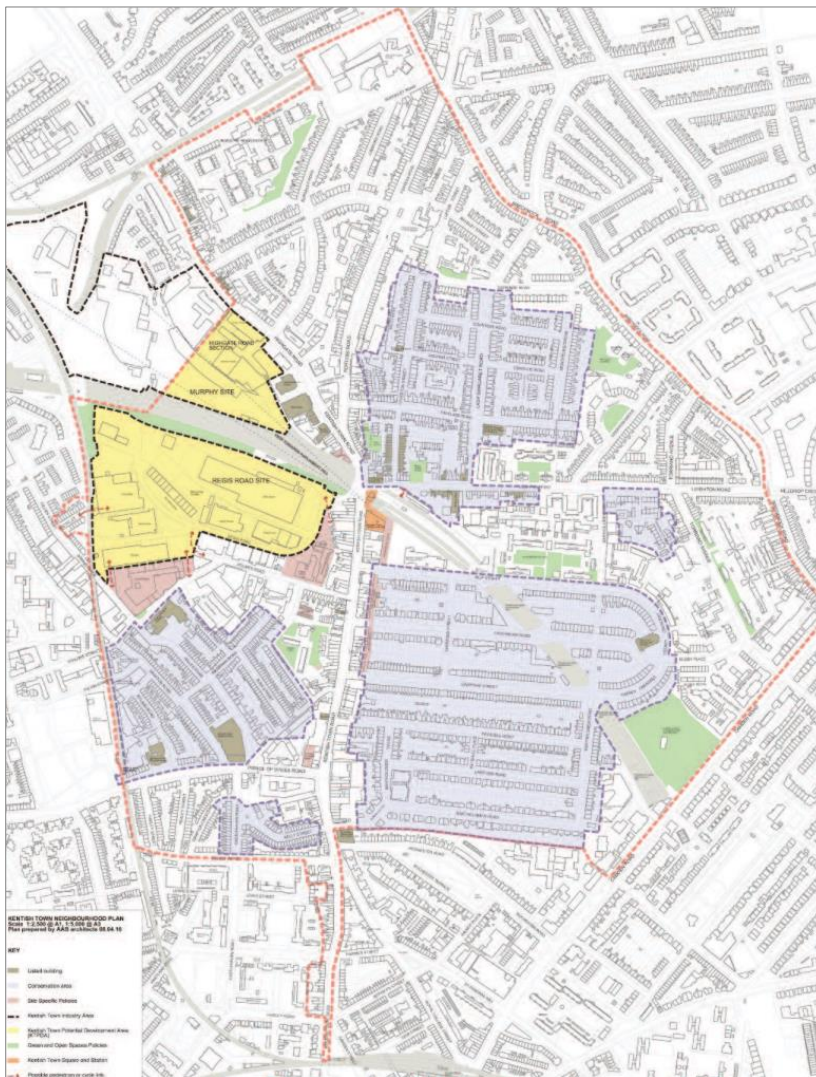
Obviously, there is an aspect of personal interpretation, but I feel it really depends on how the departments are run because, for example, we have case conferences where every week we meet and discuss cases where we are not sure. We have that discussion where we can highlight certain aspects and someone else can say like, 'Oh, have you considered this from the neighbourhood plan?' We do have that discussion and it is always like when we are unsure about something, we discuss one with each other, so we make sure we are on the same line. It is not really down to personal interpretation of a policy; it is more of how is the approach that we all take in relation to certain developments or certain aspects. Obviously, ultimately, we read the recommendation and the management signs off, but it is the aspect of how the approach is taken in certain areas and certain developments in line with what the policy says and what the guidelines say. ... We always make sure that we discuss about certain things, especially when something is something that we cannot figure out by ourselves because there are cases which are quite complicated, especially because we have so many conservation areas, so many neighbourhood forums, so many enlisted buildings, it's quite tense (PO7).

5.4 Kentish Town Neighbourhood Plan

5.4.1 Background and motivations

Kentish Town is geographically located to the mid-north-east the London Borough of Camden and close to 'London's Central Activity Zone and the King's Cross Knowledge Quarter around King's Cross and Euston stations' (Kentish Town Planning Framework (KTPF), 2020, p. 17; see also Camden Council, 2020). The north of the area is in the vicinity of Hampstead Heath which is the largest open space in the Borough of Camden (Camden Local Plan 2017; KTPF, 2020). The Kentish Town area is a dynamic residential area and has some conservation areas, while its Town Centre is the third smallest centre of the Camden Borough (PO5; PO7; Camden Planning Guidance (CPG), 2021). The railway cuts through the Kentish Town and, as one planning officer illustrated, this condition consequently causes substantial restrictions effectively to use lands for new dwellings.

Figure 3 Kentish Town Neighbourhood Plan Area (KTNP, 2016, p. 4)



The population of Kentish Town ward has grown from 13,417 in 2011 to 15,200 in 2019 which was ranked 3rd of 18 wards by population size in Camden (Camden Council, 2020). The figures are anticipated to increase by 3,800 over the next 10 years until 2029 (Camden Council, 2020). In economic terms, median household income in Kentish Town ward decreases to 'the middle of the range at £35,532, ranking 10th highest for median and 11th for mean (£41,717) household income' in Camden (Camden Council, 2020). In this context, communities of Kentish Town are concerned about loss of business, office and retail spaces, and lack of affordable housing (KTNP, 2016).

Despite such challenges and situation, Kentish Town has potential scope for growth of the area with high accessibility via train stations with connection to St. Pancras and Luton Airport and an underground station. In addition, there are enormous industrial lands which are

considered as a key factor of opportunity to improve the Kentish Town area, as planning officers and a member of the Planning Committee at Camden significantly highlighted (PC1; PO1; PO3; PO5).

Whereas, Kentish Town, to give an example, again, it is a residential area. There are some conservation areas in Kentish Town. That's also very difficult to deliver significant amounts of new housing, but what you do have in Kentish Town are those industrial lands ... Those areas are a sort of legacy of when there used to be sidings off the railway lines (PO3).

It's big and there's lots of land and everyone will be trying to get the most money possible. Industrial land is going up in value at the moment and the mayor's policy is in protecting it. We're working with the mayor, the GLA (Greater London Authority). ... That was basically used to be old railway land and then it became industrial land and it's the same land area as the whole Kings Cross development. Quite big potential, where you could do another Kings Cross in terms of jobs and homes potentially ... It's really poorly used, lots of single storey, lots of roads and dead-ends, it's not very good for people, not many people live there. Lots of parking and really poor land use, inefficient land use. (PC1).

Local people in Kentish Town decided to produce their own neighbourhood development plan (NDP) for the goals to protect the function of business and retail and to preserve the character of the area through tailored policies including sites allocated for a range of developments.

One neighbourhood plan maybe really care about trees and bio-diversity. Another Neighbourhood plan is much more interested in how they're going to deal with a particular part of their borough of the area where they have the railway running through it to help to tie up the different sides of that area and reduce the impact of the railway that cuts through their area (PO1).

5.4.2 Preparation and adoption of the neighbourhood plan

Kentish Town Neighbourhood Plan (KTNP) 2016 was prepared by Kentish Town Neighbourhood Forum (KTNF). Before the designation of the KTNF and Kentish Town Neighbourhood Area (KTNA) in 2013, two public meetings were held in April and October 2011. Representatives of six local groups, two Camden councillors, and individuals attended. One existing local group led the initial meetings and the group 'presented an outline of the Localism Bill and the National Planning Policy Framework' (NPPF) and 'what would be involved in putting together a Plan' (Kentish Town Neighbourhood Plan (KTNP) - Consultation Statement 2011-2015, p. 5-6), since the production of Localism Act and NPPF were in progress.

At the first Annual General Meeting (AGM) in January 2012, the KTNF was formed and its

committee was elected (KTNP - Consultation Statement 2011-2015; KTNP, 2016). On 14 October 2012, the KTNF had 216 signed-up members who live or work in all parts of the KTNA, since a NF has to include a minimum of 21 individuals to be designated. The KTNF and KTNA were officially approved by the London Borough of Camden on 10 April 2013. Representative local associations, local organisations and all residents living in the KTNA are entitled to become registered members of KTNF, whilst all Ward Councillors within the KTNA are automatically members of the forum. The Committee of the KTNF, consisting of up to 15 members, is elected at an AGM from members of representative local associations, local organisations and Individuals, 'with the majority being from representative local associations'. During the preparation, the KTNF held meetings, walkabouts, workshops, and statutory consultations to discuss with communities to collect planning issues which affect Kentish Town (KTNP - Consultation Statement 2011-2015).

However, the KTNF as a frontrunner felt that they had insufficient information and skills for neighbourhood planning, as the forum had undertaken it prior to the enactment of Localism Act. Despite support of several organisations and government, the forum spent a lot of time and energy to understand the role of a NF, the process of neighbourhood planning, the collection of information, and the negotiation with other local groups or forums. The followings illustrate how the KTNF overcame the internal capacity and external conflicts during the preparation of KTNP.

Insufficient planning Knowledge and skills

Existing local groups in Kentish Town played a leading role in neighbourhood planning initially. Notably, several interviewees described that most NFs were generally comprised by members of other 'existing' local groups at the beginning of the preparation of a neighbourhood development plan (NDP) (PC1; PC2; PO2). Members of the local organisation within KTNF already had relevant knowledge to respond to locally-specific affairs within Kentish Town (PC1; PC2; PO2). In particular, their experience to operate groups was beneficial to the organisation of communities in the early stage of the preparation. However, the forum was cautious to 'maintain the line that KTNF did not identify as supporting any one particular local interest group or association' (Minutes of Kentish Town Neighbourhood Forum (KTNF) 2012).

Despite prior knowledge and skills of the experienced local groups, the KTNF as a front-runner still faced a lack of clarity and knowledge about 'planning' itself and the role and scope of a NDP in dynamic and changing planning environment. The KTNF undertook to produce their NDP from 2012 shortly after the emerging Act and planning policies and during the preparation of the new Camden Local Plan, and therefore they were unfamiliar with a concept of localism, new planning system in the UK, the designation of neighbourhood forum and area, and the novel process of neighbourhood planning. The initial and second public meetings were held in 2011 and the first AGM was in January 2012 in order to learn and discuss about 'the Localism and an outline of the Localism Bill' and NPPF at public meetings before the designation of KTNF (KTNP - Consultation Statement 2011-2015, p. 4-6, 49-52). Afterwards, the Localism Act 2011 received Royal Assent on 15 November 2011 and the final version of the National Planning Policy Framework (NPPF) as the emerging planning system including Neighbourhood Planning was officially published on 27 March 2012. At the borough level, furthermore, the Camden Core Strategy 2010 and Development Policies were replaced with Camden Local Plan in 2017, whilst the KTNP was adopted in 2016.

The forum was provided with 'funding from the Department for Communities and Local Government' (DCLG); and planning support by advisors from the Prince's Foundation, Creative Citizens, Planning Aid England, Locality and Groundwork UK and also by independent advisors. Planning officers at Camden Council also supported and advised the KTNF 'to help KTNF understand the strategic planning context' during the progress of neighbourhood planning (Minutes of KTNF 2012; 2015; KTNP, 2016, p. 6; pp. 8-9), since 'the local planning authority has a duty to support neighbourhood forums' in the light of the Localism Act 2011 (Department for Communities and Local Government (DCLG), 2012, p. 10). The KTNF initially expected that 'Camden may provide officer oversight at key stages of the process' (Minutes of KTNF, 19 January 2012) and subsequently described that they had several meetings with officers to check the progress of KTNP (Minutes of KTNF, 29 January 2015). With the experienced members and various support, the KTNF overcame challenges of internal capacity.

Conflict management in the neighbourhood planning process

The KTNF utilised meeting, voting, and Memorandum of Understanding (MoU) as communication tools to defuse conflicts and to reach a consensus (KTNP - Consultation Statement 2011-2015). The forum holds regular meetings annually and quarterly to discuss various topics and shares the minutes for communication with local people through their own website from the official designation of KTNF and KTNA and still do them post-adoption. The KTNF employed voting to decide significant agendas such as the election of members of the KTNF Committee and the decisions to include or exclude other organisations into KTNF or other areas into KTNA (Minutes of KTNF 2012).

The KTNF signed agreements with other groups due to conflicts of interests with regard to planning boundaries or policies. The forum signed a MoU with two adjacent NFs: North Camden Town Neighbourhood Forum at 27 March 2013 for the overlapping boundary of the neighbourhood areas; and, as will be discussed in detail later in Section 5.4.3, Dartmouth Park Neighbourhood Forum (DPNF) at 27 August 2013 for the View Policy (Policy D1 of the KTNP) and the Kentish Town Industry Area Policies (Policy SP2 and SP2a of the KTNP) (KTNP - Consultation Statement 2011-2015; KTNP, 2016; Dartmouth Park Neighbourhood Plan 2020). In this context, the KTNF described that they struggled to designate the NF and area:

Selecting a NDPA (Neighbourhood Development Plan Area) took a long time to complete because, although an Area was voted on at the AGM, later on a group of local people decided they wanted to set up a separate Forum and Area, while another group asked if their part of Kentish Town could be included in the Kentish Town NDPA. After many discussions, the Kentish Town Neighbourhood Plan Area was designated on 10 April 2013 (KTNP, 2016, p. 8).

5.4.3 Overview of content and aims of the neighbourhood plan

Kentish Town Neighbourhood Plan (KTNP) passed referendum with 90.9 % in favour and 13.75% turnout in June 2016. The Kentish Town Neighbourhood Forum (KTNF) set up six working parties to push forward the development of policies of the KTNP. The working groups consisted of 'local residents, local business people, KTNF committee members and Forum Advisors' but fluctuated between four and twelve people from June 2013 until January 2014 (Kentish Town Neighbourhood Plan (KTNP) - Consultation Statement 2011-2015, p. 28). Policies of the KTNP were established to deal with the concerns and interests of communities

and to deliver the goal of ‘a balanced and vibrant neighbourhood’. The KTNF particularly sought to protect employment space and open green spaces and to resist the decrease of retail units (KTNP, 2016). The KTNP comprises three main sections such as General Development Policies, Spatial Policies and Site Specific Policies, providing a guidance and framework for subsequent development activities within the Kentish Town Neighbourhood Area (KTNA).

The KTNP allocates several sites for a diverse range and scale of developments. For this, one planning officer described that neighbourhood planning groups (NPGs) who designate sites for particular developments have ‘specific ideas about how they want that site to be developed’ and consequently set out ‘spatial policies for a particular site within their area’ (PO1). It is worth noting that four out of seven NDPs within Camden do not set out spatial policies such as Hampstead, Camley Street, Fortune Green and West Hampstead, and Redington Froggnal NDPs. In this regard, planning officers at Camden recounted that the KTNF is ‘probably more pro-development than most neighbourhood forums’, since the forum are ‘very keen on these areas being redeveloped in their plan as proposal to redevelop these areas’ and the KTNP is ‘not too restrictive’ (PO2; PO5).

I think, the Kentish Town Neighbourhood Plan is the only one that has site-specific policies. I have not seen another plan that has site-specific policies, all the other plans are just blanket policies which apply against the whole borough rather than being a site-specific (PO1).

Kentish is not that difficult because the neighbourhood plan for Kentish town itself is not too restrictive unless you go to the locally listed buildings which we would have to give them more weight and try to protect those buildings if they're local listed. If not, then from my experience, it's not that restrictive but they do have to create additional requirements as well. (PO5).

Kentish Town are still very active. There are quite a few large development sites in their area. They're probably more pro-development than most neighbourhood forums. They're very keen on these areas being redeveloped in their plan as proposal to redevelop these areas (PO2).

Spatial developments and site allocation

The KTNP set forth two Spatial Policies and seven Site Specific Policies, allocating particular sites with specific requirements for diverse developments for the growth of local area. Some policies focus on large industrial areas which have comprised a variety of low density industrial and warehousing uses. For the industrial sites, the KTNF designated Policy SP2: Kentish Town Potential Development Area (KTPDA) for the Regis Road and Murphy's sites in order to deliver ‘a substantial increase in jobs and homes, new public open space and

community facilities as part of an innovative mixed-use neighbourhood’ (Camden Local Plan 2017, p. 30, paragraph 2.32; Kentish Town Planning Framework (KTPF), 2020, p. 9; PC1; PO3). The allocated sites are as large as King’s Cross Central (PC1; KTPF, 2020). The KTNF considered the areas as ‘scope for significant intensification’, as the chairman of the forum narrated ‘These sites are extraordinary. They are under-used. Many of the buildings are single-storey, and have large car parks’ (Carrier, 2018). Another member of the forum expressed that ‘We could accommodate as much work space as there is there today, but by building up we could provide housing units and make an amazing contribution to Kentish Town’ (Carrier, 2018).

They were redeveloped in the 1970s, '80s, maybe even the early '90s, with low-rise, low-slung light industrial uses where the council considers, and a neighbourhood plan, as well, neighbourhood forum, that there is the opportunity to redevelop some of those areas. ... particularly a number of these units have very large car parking areas. They have very large service yards and they are almost entirely built as single story. There is an opportunity with both of those bits of land north and south of the railway line to reconfigure, change the layout to intensify the industrial floor space ... At the same time, you could also provide other uses there such as residential (PO3).

Protection of the Town Centre

KTNF was keen to protect retail spaces on the Kentish Town Road, as communities had a significant concern about the decline of vitality of town centre of Kentish Town as discussed in Section 5.4.1. KTNP accordingly set forth two Policies SW2 (Protection of secondary shopping frontages) and SW3 (Consecutive secondary shopping frontages), by suggesting additional requirements to local plan. In particular, the KTNF surveyed the type and placement of the core and secondary frontages in Kentish Town Road at first hand in order for the establishment of policies on the basis of the robust evidence (Appendix 2 and 3 of the KTNP, 2016). The figures of policies are more restrictive than those of the previous and the latest Camden Planning Guidance (CPG). In terms of the level of retail use, the CPG 2021 states that the figures of the KTNP are prioritised ‘even though the Local Plan is a more recently adopted document’ (Camden Planning Guidance (CPG), 2021, p. 63). In this regard, three planning officers pointed out that NDPs can override the local plan, if there are strong reason and robust evidence (PO3; PO5; PO7). However, as will be discussed later in the Section 5.4.5, it should be noted that these policies became invalid due to the changing of the government policy in England.

The scope of policies crosses over the designated neighbourhood area

Policies of the KTNP for the viewing corridor (D1) and the industrial areas (SP2) influence an adjacent neighbourhood forum area. The KTNF discussed with the Dartmouth Park Neighbourhood Forum (DPNF) about the policies which potentially affect the Dartmouth Park Neighbourhood Area (DPNA), since the DPNF already existed during preparation of the KTNP. The forums had a meeting on 27 July 2015, and signed a Memorandum of Understanding (MoU) for the development policy relating to the Murphy Site within the Kentish Town Potential Development Area (KTPDA) for Policy SP2 and for the viewing corridor between Parliament Hill and Kentish Town station for Policy D1 (KTNP, 2016). Once the Dartmouth Park Neighbourhood Plan (DPNP) is adopted on 2 March 2020 and referred to these policies of KTNP (Dartmouth Park Neighbourhood Plan 2020).

5.4.4 Interaction with the Local Plan

The Kentish Town Neighbourhood Plan (KTNP) interacts with both the previous and emerging local plan, as the KTNP 2016 was adopted between the previous Camden Council's Local Development Framework 2010 and the 2017 Camden Local Plan. The Camden Local Plan 2017 replaced the Camden Core Strategy and Development Policies 2010.

Additional and locally-specific requirements

Policies of the KTNP 2016 were produced on the basis of the Camden Development Documents 2010, adding certain additional elements in relation to the local plan policies or readjusting them to the particular local environment of Kentish Town. For example, Camden Council stressed the potential of the Kentish Town Industry Area through Core Strategy of Camden (Camden Core Strategy 2010, p. 83), Kentish Town Neighbourhood Forum (KTNF) accordingly framed spatial policies with site allocation to promote various types of developments on industrial lands such as Murphy and Regis Road sites, as will be discussed in depth later. In addition, the Policy 'Getting Around Policy GA: Step-free access in Kentish Town Stations' in KTNP was established on the basis of the local plan, as one planning officer

described below. It is noticeable that the previous local plan documents of Camden were made before the Localism Act 2011 was introduced, although the KTNP conformed to the strategy policies of Camden Council.

In the Kentish Town neighbourhood plan, they have a policy where they require step-free access to all railways stations within Kentish Town neighbourhood plan. They do create slightly more requirements to it but again, our local plan themselves already have this requirement of having the free access to most of the public transport facilities. They just adding on it just to give it more force or so that the developers would comply with it. I think, Kentish Town is formed with a plan. It's okay. It's not too difficult to apply (PO5).

In addition, the KTNP set out more restrictive policies regarding the environment of commercial business than Camden Council's existing policies in order to protect the condition of retail and the function of the centre in line with locally-distinctive conditions: Policy SW 2 - protection of secondary shopping frontages and Policy SW3 - consecutive secondary shopping frontages (Camden Planning Guidance 5 Town Centres, Retail and Employment adopted 2011, revised 2013; KTNP, 2016). The KTNF particularly surveyed the core and secondary frontages in Kentish Town Road in order to identify the current status on the ground for the robust and empirical evidence (see more: Appendix 2 and 3 of the KTNP, 2016).

As for SW2, whilst Camden Council seeks to avoid vacant retail premises in Secondary Shopping Frontages where proposals may result in less than 50% of the premises being in A1 Retail usage in Secondary Shopping Frontages, the KTNF resists proposals for change of use that result in less than 60% of the premises being in A1 Retail usage in Secondary Shopping Frontages. According to the KTNP, '50%' implies that 'the area is not predominantly retail and has lost character and viability as a shopping area', since they surveyed that there was only 32% for A1 shops usage (KTNP, 2016, p. 18). In addition, as to SW3, 'within Secondary Shopping Frontages proposed changes of use resulting in more than two consecutive frontages being in non-A1 Retail usage will be resisted' in the light of the KTNP, whereas Camden Council sets out more than three. The KTNF states 'the proliferation of three (or more) consecutive non-retail premises is affecting the character and vitality of the Secondary Frontages', while there are 'eight instances of three or more consecutive non-A1 Shops usage premises' in the Secondary Frontages in Kentish Town (KTNP, 2016, p. 19). It is worth noticing that the Camden Planning Guidance (CPG) 2021 set the same figures for the level of retail use as the previous CPG and the Camden Local Plan 2017, and states that the figures in the KTNP override those in the Local Plan even though the latest plan generally takes precedence

(Camden Planning Guidance 5 Town Centres, Retail and Employment adopted 2011, revised 2013; Camden Local Plan 2017; Camden Council Planning Guidance document Town Centres and Retail 2018; Camden Planning Guidance 2021):

This guidance should be read in conjunction with the Kentish Town Neighbourhood Plan which contains a locally specific approach to the level of uses within the frontages in parts of Kentish Town. Where these differ from the figures in the Local Plan, the Council will apply the figures in the Neighbourhood Plan (even though the Local Plan is a more recently adopted document) The Neighbourhood Plan also contains a specific policy relating to specific shops outside of designated centres. (Camden Planning Guidance 2021, p. 351)

However, notably, as the government replaced with a series of new Use Classes which relates to land within England on September 2020, relevant policies within KTNP 2016 became invalid. That is, some policies of KTNP were already superseded by other up-to-date plans, although the plan period is between 2016 and 2031. Local people in Kentish Town seek 'to provide a framework for how planning decisions will be made' in the KTNP through the KTNP (KTNP, 2016, p. 6), but even the adopted development plan cannot guarantee that the aspiration of communities will be fully realised due to changing external environment surrounding the KTNP. For such circumstance, one planning officer exemplified that the government brings in Class E which 'affects all the plans at the same time' (PO1), while there is a time lag that changing policies of the emerging plans affect the existing plans between local plans and NDPs. The officer illustrated the stance and power of the central government: 'You have all the policies a bit behind in terms of we're still working with policies that talk about A1 and A2, A3, A4, A5, but now we have Class E, so all the policies are out of date simultaneously.'

It changed when the government brings in Class E, as happened recently, then, obviously, that changes a lot of our policies. That affects all the plans at the same time, and also, the change and introduction of Class E doesn't align even with the National Planning Policy Framework. (PO1).

In this respect, this circumstance clearly describes that the NDPs continuously interacts positively or negatively with external planning context, herein, other tier plans within the hierarchical planning system in England (Healey, 1993).

Impact of the KTNP on the local plan

Camden Council reflected the ideas and aspiration of the KTNP 2016 in the new local plan 2017. It is noteworthy that one spatial policy of the KTNP was adopted into one of policies within the subsequent local plan 2017, as the Kentish Town industrial areas were considered

as ‘the biggest challenge’ for ‘employment and industrial use’ not only at the neighbourhood level, but also at the borough level (Kentish Town Planning Framework (KTPF), 2020, p. 9; PO7).

I think, in relation to the Kentish Town actually, I think the policy in relation to employment and industrial use were quite important for the Local Plan to be considered. Because what neighbourhood plans helped to define is what the community thinks is important for a certain area, and then the Local Plan is a general image of the whole Council. (PO7).

The development areas in Kentish Town present an exceptional opportunity that could enable significant regeneration and growth benefits for this important part of inner London (Kentish Town Planning Framework, 2020, p. 9).

The KTNP 2016 designated the Policy SP2: Kentish Town Potential Development Area (KTPDA) for ‘a mixed use development whilst retaining and increasing the scale of industrial and employment opportunities’, by encouraging ‘the growth of small and start-up businesses’, since the sites have been mostly comprised by diverse and low density industrial and warehousing uses (KTNP, 2016, p. 41). This development covers both north and south industrial sites next to the railway in Kentish Town, including mainly the Regis Road and Murphy’s sites (PO3; PC1).

After the adoption of the KTNP 2016, Camden Council has designated ‘the Regis Road Site’ in the south area of the railway as ‘Kentish Town Growth Area’ for the management of a large development in the Camden Local Plan 2017, since the industrial sites within Kentish Town ‘were quite important for the Local Plan to be considered’ (PO7). The council marked the KTNF down as a partner ‘to further investigate this opportunity’ for the re-development of this site in the local plan (Camden Local Plan 2017, p. 30).

However, there was a difference between the local plan policy and Policy SP2 of the KTNP, although the KTNF illustrated that ‘Camden has adopted the Regis Road plan in the overall KTNF plan into its local plan’ (Minutes of Kentish Town Neighbourhood Forum (KTNF), 2017). To be specific, ‘only’ the Regis Road Site was subject to redevelopment in the Local Plan 2017, whilst the KTNF sought a comprehensive and co-ordinated approach for the potential redevelopment of the KTPDA which includes Regis Road Site and Murphy Site (KTNP, 2016; Camden Local Plan 2017; Minutes of KTNF, 2017; Minutes of KTNF, 2018). The KTNF felt that ‘Camden has adopted the Regis Road plan in the overall KTNF plan into its local plan’ (Minutes of KTNF, 2017), although the KTNF already recognised and indicated that the ‘emerging’

Camden Local Plan may be different from the KTNP during the preparation of the KTNP:

The potential development for a mix of uses has been proposed in Camden's emerging Local Plan Growth Area Policy that relates only to land on Regis Road Site. The current boundary of the Industry Area remains extant as planning policy up until changes to strategic policy are confirmed through the examination of Camden's Local Plan. Camden Council is not seeking to alter the provisions of the Industry Area designation with respect to Murphy Site or Highgate Road Section. (KTNP, 2016, p. 41)

Figure 4 Policy SP2: Kentish Town Potential Development Area (KTPDA) (KTNP, 2016, p. 45)

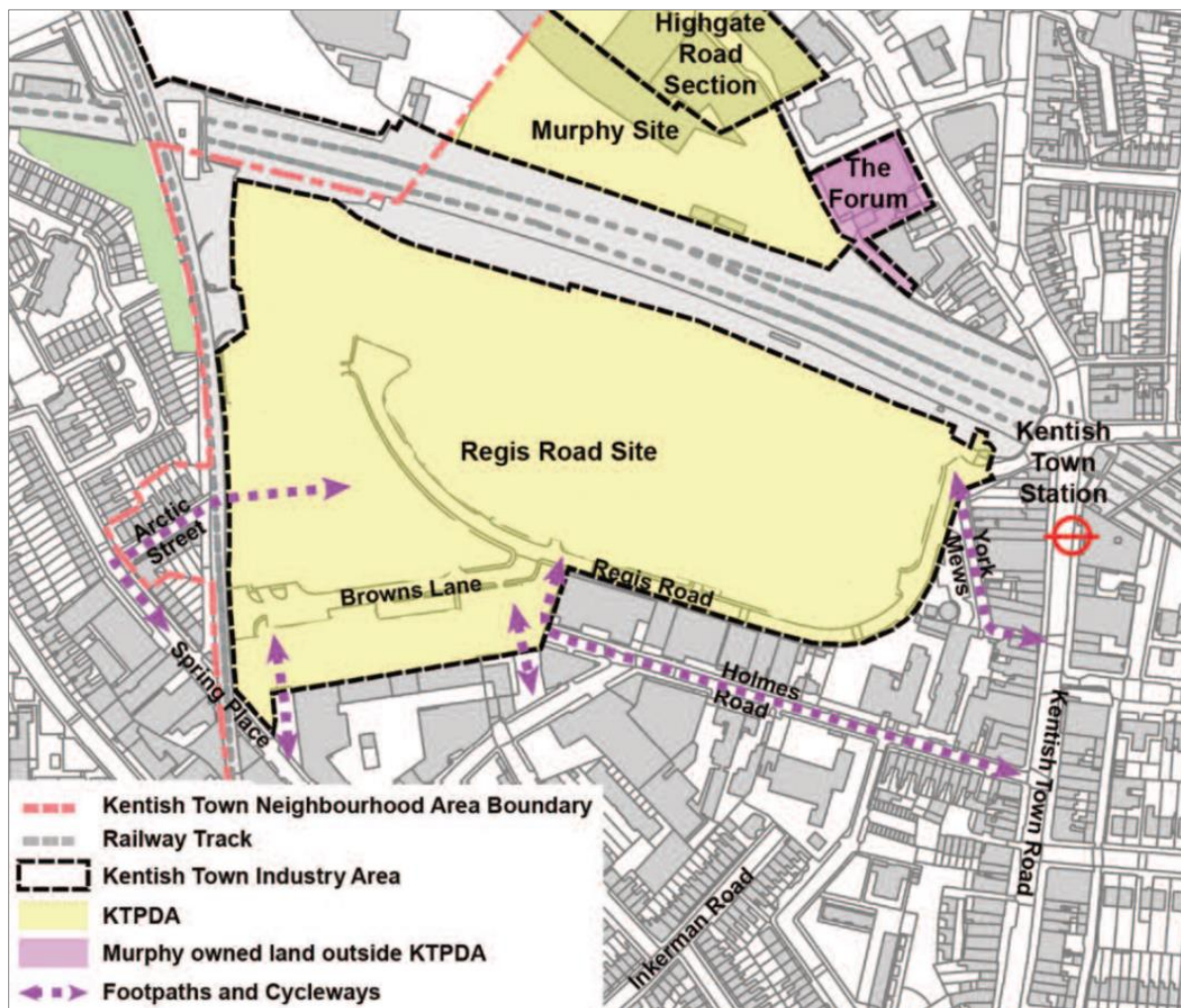
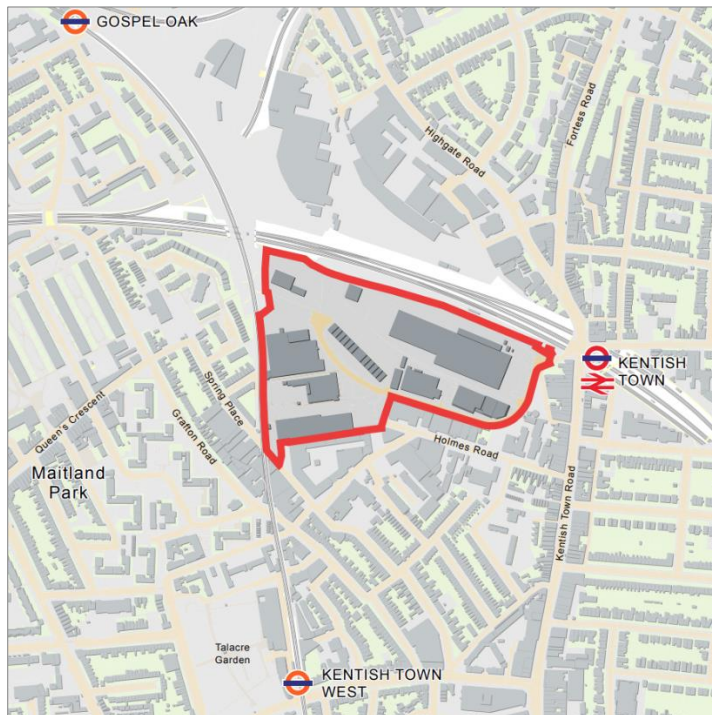


Figure 5 Kentish Town Regis Road - Growth and spatial strategy (Camden Local Plan, 2017, p. 4)



Furthermore, Camden Council adopted Kentish Town Planning Framework (KTPF) as a Supplementary Planning Document on 17 July 2020. The latest KTPF unlike the local plan is similar with the initial intention of the KTNP, as the framework indicates that ‘within the framework area there are two principle development areas that are expected to come forward for comprehensive redevelopment’, covering both the Regis Road Growth Area and Murphy’s Yard as KTNP set out (KTPF, 2020, p. 19). One planning officer represented that the KTPF ‘basically strengthen the arguments of the neighbourhood plan’ (PO7), since this framework is a supplementary document which is afforded weight as a material planning consideration in principle. This implicitly implies that the local planning authority (LPA) is keen to realise the policies of the KTNP. It will be beneficial to local communities, since a decision-maker who has a substantial power for planning permission is likely to speak with one voice and to attach more weight to the KTNP during the assessment of planning applications within the designated sites. In this regard, one planning officer recounted that the Camden Council sought synergy between the local plan and the NPD.

For Kentish Town from the Local Plan, the neighbourhood plan, we created the Kentish Town Planning Framework, which actually looks into much detail of what the neighbourhood plan considered in relation to Murphy's Yard and Regis Road industrial areas and basically strengthen the arguments of the neighbourhood plan within the framework (PO7).

At that particular point in time, I think there were only a couple of neighbourhood plans which were being adopted. One was the Kentish Town, which we discussed earlier where the biggest challenge or issue there was about the industrial plans next to the railway. Camden were looking at that through the local plan and the neighbourhood forum were looking at that through the neighbourhood plan. It was like a bit of synergy where one was informing the other (PO3).

Figure 6 Development areas of Kentish Town Planning Framework (KTPF, 2020, p. 4)



The Kentish Town and Dartmouth Park Neighbourhood Forums co-worked with the local planning authorities to produce the KTPF, as the designated development sites of the KTPF are covered by the Kentish Town and Dartmouth Park Neighbourhood Areas. This also intimates that the ongoing work of neighbourhood planning groups (NPGs) post-adoption is influential to ensure that a NDP is upheld and effectively applied to 'consequent' planning policies.

Recognition and adjustment: the issue of timing of production

The LPA and the KTNF co-worked the production of the local plan and the KTNP, since the preparatory periods overlapped. The time-gap between local plan and NDP or the overlapping the periods of the preparation of two plans is rarely regarded as a significant issue, since there are no substantial changes to the new local plan, the LPA and KTNF were already aware of such circumstance, and the planning policy team of Camden was engaged in the neighbourhood planning, as planning officers revealed (PO1; PO2; PO4; PO5). The KTNF also recognised already and mentioned the ‘emerging’ Camden Local Plan within the KTNP (KTNP, 2016, p. 41). That is, planning officers and the KTNF were involved in the production of the local plan and the KTNP (PO1; PO2). When the LPA prepared the new local plan, the planning officers worked and shared with the KTNF to make sure that the forum is aware of the emerging local plan, although the KTNP had to be in conformity with the existing version of the plan (PO2). For this, planning officers recalled that:

We were releasing our local plan at the same time. We were aware that that was going to be an issue that we were going to ... Quite soon after the Kentish Town Plan was adopted, our plan was adopted. ... Even though they had to be in line with the old plan, they made sure that they were as closely aligned with the new plan that was emerging as they could (PO2).

I do not think you will find anything in the neighbourhood plan even though it was a made a year earlier than the local plan which is out of alignment. ... It is important obviously when a plan is made that it is in conformity and the fact that it was in conformity to the local development framework, it is obviously how it would be done when it was made but I am not aware of any policies which are not in conformity to the local plan which came later. (PO1).

If you look at their policies, their policy on shopping, on working, on design, on housing, on getting around the green and open spaces, I can't see any of those policies where there's been substantial change in our own policies from Local Development Framework to Local Plan which would then have made these policies out of date. (PO1).

We have in the planning policy team, where we have officers that works on neighbourhood plans specifically or helps community to develop their neighbourhood plan anyway. Those officers would definitely know what our policies are currently made in Camden and when the neighbourhood plans are being developed in neighbourhood reforms, then they would know whether it complies with neighbourhood plan and our officers that are there to advise them anyway. There is a time gap but I do not see those a huge conflict developed because of the time gap (PO5).

In particular, if there were differences between the local plan and the NDP, the Camden states a reference to the NDP in their local plan and Planning Guidance, as will be discussed below:

There were a few plans. There was a couple of references, I think, in the local plan as well. They did say that on this issue that you make a reference to the neighbourhood plan because

we knew that what we were putting in was slightly different to what neighbourhood plan was putting in. We made a reference to say, 'On this, we will take into account the neighbourhood plans position.' (PO2).

Therefore, the robust KTNP itself with specific policies and the ongoing activities of KTNF were substantially influential in the subsequent local plan, as planning officers were able to recognise that the inclination and priorities of local people through them (PO3). This is mutually beneficial, if the KTNP is effectively reflected into the local plan of the LPA who has a significant power in decision-making:

In the case of Kentish Town, that was something that the council were looking at doing as part of the Camden local plan, which was an examination in 2016. The neighbourhood plan for Kentish Town came forward a little bit in advance of that. It was helpful to the council that the community were kind of saying, 'Yes, this is something that we will support. We would like to see this land used in a more efficient way.' The forum used their neighbourhood plan as an opportunity to say, 'Yes, you could deliver a high-quality scheme here or in these locations with new housing.' That was a real positive of that one (PO3).

5.4.5 Role of the neighbourhood development plan in decision-making

This section explores the use of Kentish Town Neighbourhood Plan (KTNP) throughout the process of decision-making within Kentish Town Neighbourhood Area (KTNA) by quantitative and qualitative approaches respectively (see more Chapter 4). The first part analyses the extent to which KTNP and its policies have been cited by whom in what stage during decision-making. Another part investigates why and how actors use and interpret policies of KTNP, the degree to which KTNP impacts on the perception and attitude of the actors, and whether and how the ongoing involvement of Kentish Town Neighbourhood Forum (KTNF) is influential in the determination.

1) Quantitative overview

This first part examines the effectiveness of KTNP, by exploring the extent to which KTNP and its provisions have been used in documents that are officially taken into account throughout the process of decision-making. For this, a key criterion the number of citations of them at key stages in order to identify when and who refers to KTNP and which policies are more and less cited. The figures of citation can indicate the effectiveness of the plan and the way in which the plan influences the perception of actors. Subjects of this analysis are planning

applications and their decisions from 2016 until 2020 within KTNA. Total 162 decided applications in the whole of the KTNA, including 6 proposals within the allocated sites, were investigated by KTNP itself and its policies separately.

Citation of the Kentish Town Neighbourhood Plan itself

According to the quantitative data analysed, 104 of total 162 researched planning schemes included planning or design statements, while 58 proposals were submitted with 'only' an application form. In 104 submitted planning-related statements, 17 (16.75%) applications cited the KTNP in the whole of the KTNA, 2 (50.00%) of 4 applications did within the allocated sites. This indicates that policies with site allocation have more significant impact on perception of actors and in turn the process of decision-making, as can be seen in Table 2, since the spatial policies are designated with relatively specific and detail requirements and priorities for each particular site. This, however, implies that the specific spatial policies may be limited to be broadly used.

Moreover, the qualitative resources revealed that the level of citation depends on type of development. Most proposals have been normally related to householder or minor developments, for example, replacement of door, change of use, erection or demolition of a single storey, replacement of the existing window. This happens not only in Kentish Town but also other case areas such as Hampstead, Olney Town and Newport Pagnell. Notably, only 5 out of 162 schemes have been referred to the Planning Committee to be determined, since Kentish Town comprises mostly residential and conservation areas despite huge industrial areas.

As for the KTNF, the forum has responded to only 19 (11.73%) of 162 applications within the KTNA, although one planning officer recounted that neighbourhood forums are unnecessarily active (PO2). The KTNP was taken into account in 9 (47.37%) out of 19 consultation responses of the KTNF in the whole of the KTNA, whilst the KTNF submitted only one response without the citation of the KTNP within the allocated sites of the KTNP. The KTNF stated 'no comment' on 56 (34.57%) applications. Furthermore, the KTNP has been rarely cited by consultees including local organisations and individuals (see Figure 7). One planning officer at Camden

presumed that local people may have the less perception of the KTNP, as the plan was produced in 2016 (PO7). The officer added that the KTNF accordingly can remind communities of existence of the KTNP by revising the plan:

Kentish Town, six years is quite a long time since it has been, so a lot has happened in the meantime. Maybe the time maybe they should be refreshed more often, maybe they should be updated more often so it builds up in people's mind that is something they need to look at and refer to it (PO7).

Citation of policies of the Kentish Town Neighbourhood Plan

In terms of the citation of policies, actors mostly have referred to the KTNP itself rather than citing or quoting specific policies of the KTNP, as can be seen in the table 3 and Figure 8. In particular, only few specific policies have been intensively cited during the processes of decision-making. Only 'Policy D3: Design principles' was cited higher than 60% in decision-making, whilst 12 out of 15 policies of the KTNP were less than 5%. It shows that policies of the KTNP have not been widely used, although local people and the KTNF invested a lot of time and effort to identify and establish the policies to deal with locally-specific issues in their area. This analysis discloses a substantial gap between priorities of local communities and their applications given the actual use of actors, and illustrates that the specific and robust policies like site allocation or design will be useful to achieve what aspirations local communities.

Table 2 Citation of Kentish Town Neighbourhood Plan in decision-making

Documents	In the whole neighbourhood area Total 162 decided applications				Within allocated sites Total 5 decided applications			
	Figure of submitted documents	% of the submission	Figure of citation	% of the citation of the NP**	Figure of submitted documents	% of the submission	Figure of citation	% of the citation of the NP**
Statements of application	104	64.20%	17	16.35%	4	80.00%	2	50.00%
CR of the KTNF	19	11.73%	9	47.37%	1	20.00%	-	-
CR of Councillors	2	1.23%	2	100.00%	-	-	-	-
CR of residents	59	36.42%	1	1.69%	-	-	-	-
CR of civic organisations	18	11.11%	2	11.11%	-	-	-	-
CR of other formal consultees	13	8.02%	-	-	-	-	-	-

Report of planning officer	27	16.67%	21	77.78%	2	40.00%	1	50.00%
Minute of Planning Committee	5	3.09%	1	20.00%	1	20.00%	1	100.00%
Decision Notice	154	95.06%	96	62.34%	5	100.00%	1	20.00%
Appeal Decision	2	1.23%	1	50.00%	-	-	-	-

* CR: Consultation response, KTNF: Kentish Town Neighbourhood Forum

** % of the citation = a number of citations of the neighbourhood plan / a number of the submitted documents × 100

Figure 7 Citation of the Kentish Town Neighbourhood Plan in decision-making

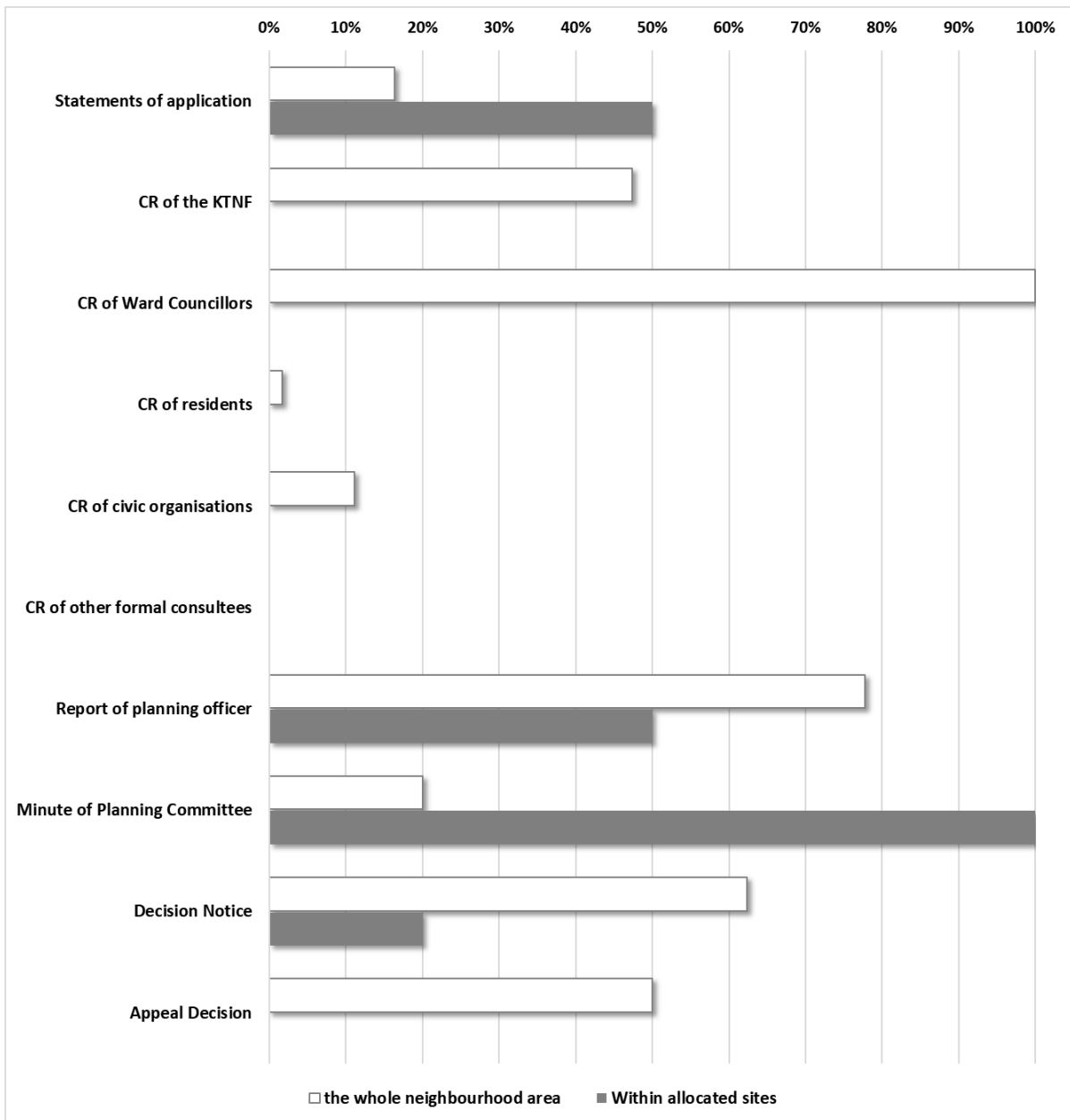
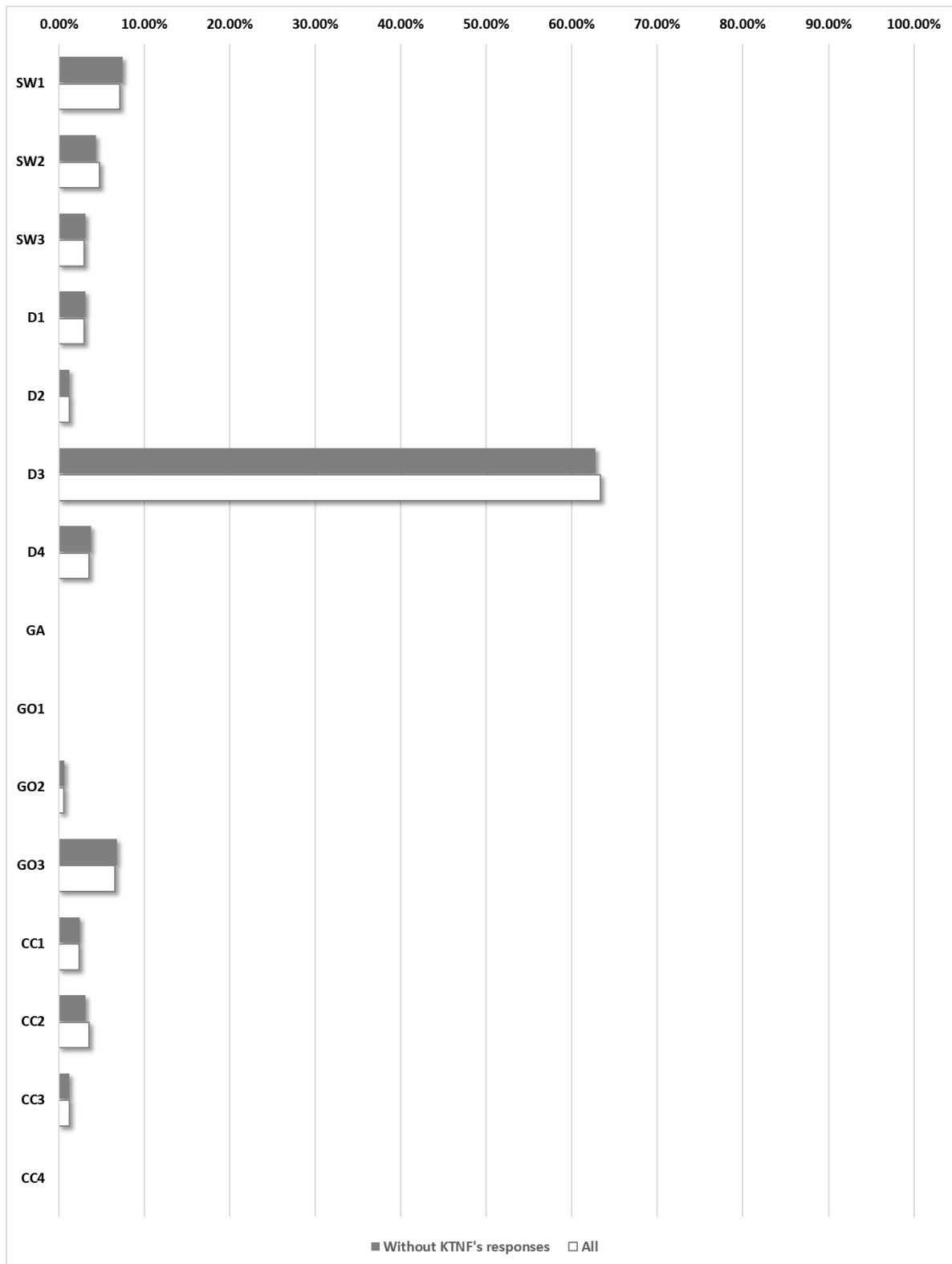


Table 3 Citation of policies of Kentish Town Neighbourhood Plan in decision-making

Policies of Kentish Town Neighbourhood Plan	Figure of citation on documents for 162 applications		Without HNF's responses	
Shopping & Working Policy SW1: Supporting small business	12	6.52%	12	6.86%
Shopping & Working Policy SW2: Protection of secondary shopping frontages	8	4.35%	7	4.00%
Shopping & Working Policy SW3: Consecutive secondary shopping frontages	5	2.72%	5	2.86%
Design Policy D1: The view of Parliament Hill	5	2.72%	5	2.86%
Design Policy D2: Railway lands	2	1.09%	2	1.14%
Design Policy D3: Design principles	107	58.15%	101	57.71%
Design Policy D4: Non-designated heritage assets	6	3.26%	6	3.43%
Getting Around Policy GA: Step-free access in Kentish Town Stations	0	0.00%	0	0.00%
Green & Open Spaces Policy GO1: Local Green Spaces	0	0.00%	0	0.00%
Green & Open Spaces Policy GO2: Open spaces on estates	1	0.54%	1	0.57%
Green & Open Spaces Policy GO3: Biodiverse habitats	11	5.98%	11	6.29%
Community & Culture Policy CC1: Pre Application Consultation	4	2.17%	4	2.29%
Community & Culture Policy CC2: Statements of Community Consultation and Statements of Neighbour Involvement	6	3.26%	5	2.86%
Community & Culture Policy CC3: Protection of Public Houses	2	1.09%	2	1.14%
Community & Culture Policy CC4: Protection of shops outside the centre	0	0.00%	0	0.00%
SP1: Kentish Town Square PHASE 1	1	0.54%	1	0.57%
SP2: Kentish Town Potential Development Area	2	1.09%	2	1.14%
SP2a: KTPDA General development criteria	2	1.09%	2	1.14%
SSP1: Car Wash Site Kentish Town Road	3	1.63%	3	1.71%
SSP2: York Mews, Section House and land around the Police Station	0	0.00%	0	0.00%
SSP3: Frideswide Place / Kentish Town Library	0	0.00%	0	0.00%
SSP4: Wolsey Mews	1	0.54%	1	0.57%
SSP5: 2 Prince of Wales Road	0	0.00%	0	0.00%
SSP6: Veolia Council Depot Site	2	1.09%	1	0.57%
SSP7: Small sites and infill development	2	1.09%	2	1.14%
Appendix 1	1	0.54%	1	0.57%
Appendix 2	1	0.54%	1	0.57%
Appendix 3	0	0.00%	0	0.00%
Appendix 4	0	0.00%	0	0.00%
Appendix 5	0	0.00%	0	0.00%
Total	184	100.00%	175	100.00%

Figure 8 Citation of policies of Kentish Town Neighbourhood Plan in decision-making



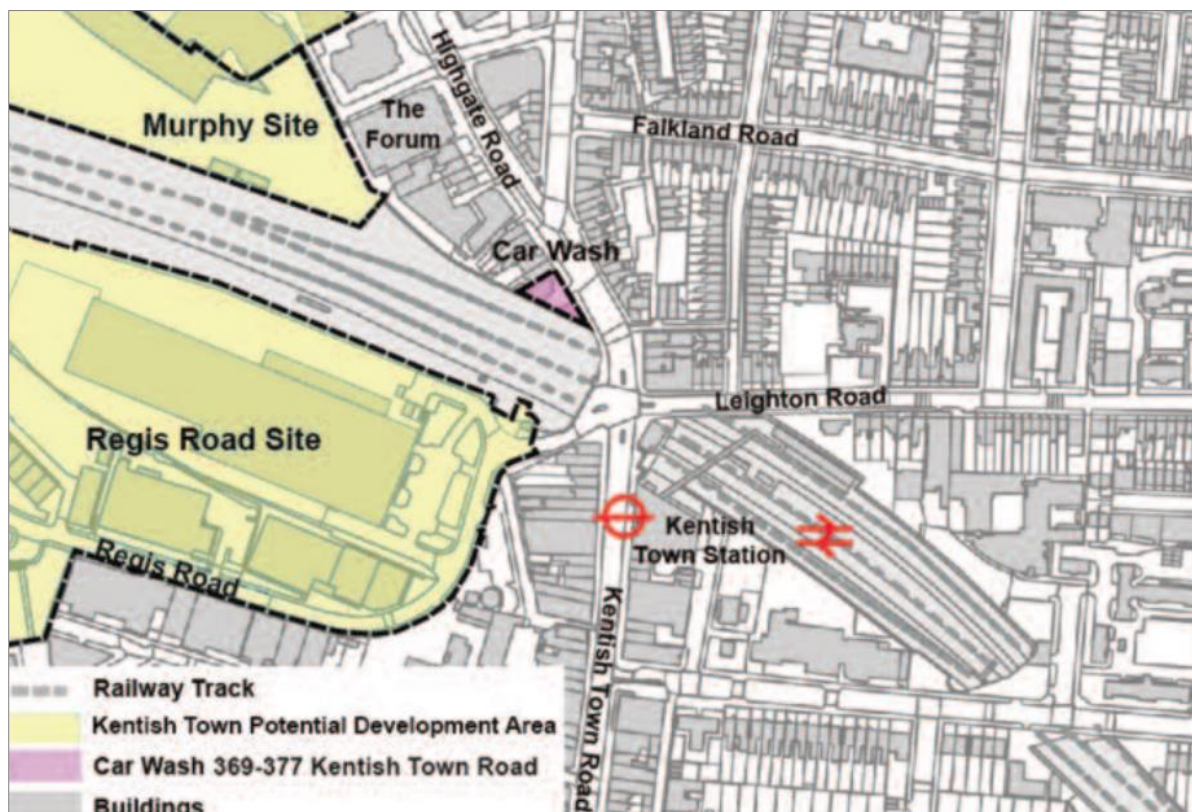
2) Case study applications

Kentish Town Neighbourhood Plan (KTNP) has been used by actors in decision-making as discussed above. The following section scrutinises two applications to identify the impact and work of the NDP through the decision-making process in practice, since its effectiveness depends on how actors perceive and interpret.

Application 2019/0910/P and Policy SSP1

Planning application (Reference. 2019/0910/P) was submitted in February 2019. The proposal aimed for redevelopment including change of use from car wash and erection of part six and part seven storey building plus basement to provide 14 flats at 1st floor and above; and retail or restaurant use at ground. This scheme was determined at Development Control Committee level, since the development comprised for '10 or more new dwellings'. Camden Council granted the Full Planning Permission Granted Subject to a Section 106 Legal Agreement on 12 March 2020, although there were a number of objections from local organisations and people.

Figure 9 Policy SSP1: Car wash site map (KTNP, 2016, p. 49)



The site falls with the 'Town Centre' of Kentish Town and the Kentish Town Neighbourhood Area (KTNA). Kentish Town Neighbourhood Forum (KTNF) stated that this existing building was regarded as 'an eyesore for most of the public' and that therefore 'its redevelopment as a mixed use building will benefit the community' (KTNP, 2016, p. 49; see also Osley, 2019b). In particular, this site is directly related to Policy SSP1 'Car wash site' of the KTNP (KTNP, 2016, p. 49). The site is not located in a conservation area, although Kentish Town conservation area is to the east of the site. There are also several adjacent Grade II listed buildings. The site was used for a car wash and geographically occupied a triangular site on the west side of Kentish Town Road. There is a wide railway cutting to the rear. The neighbouring building to the north is 5 storeys and the remainder of the adjoining terrace is 3 storeys.

The applicant sought to understand and reflect the meaning and intention of the KTNF by analysing Policies of D3 (Design principles), SSP1 and SSP3 (Frideswide Place / Kentish Town Library) of the KTNP, and considered the Kentish Town Planning Framework (KTPF) which had been in the initial consultation at that time (Planning Statement of Reference 2019/0910/P). The developer recognised how NDPs are taken into account in determination of the planning application. The applicant had a number of meetings with the KNTF and was accordingly able to avoid misinterpretation of the KTNP and to understand the priorities of those who made the KTNP. The forum described that:

Over a series of half a dozen meetings KTNF were encouraged by the way in which the development team grew to understand the intentions presented in the Neighbourhood Plan, and their enthusiasm to fulfil our ambitions (Consultation response of the KTNF 2019).

Moreover, in the light of the policies CC1 and CC2 of the KTNP (see 5.4.4), the developer held pre-application discussion in both December 2017 and February 2018 and public consultation events in January 2019; and submitted the Statement of Community Involvement. The applicant revised their initial scheme responding to the comments: 'Prior to submission, the scheme was revised to try to address comments from the Design Review Panel by reducing height and bulk on the northern end of the building' (Planning Officer's report of Reference 2019/0910/P, paragraph 2.2; Planning Statement of Reference 2019/0910/P, pp. 8-9).

During the process of the decision-making, there was a conflict due to delay on decision-making. The LPA tended to respond to the progress of the application regarding the policy SSP1 'Car Wash site' after the KTPF is adopted. The officers assumed that the site for SSP1

would be connected to industrial developments of Policy SP2: Kentish Town Potential Development Area, whilst the KTNF designated the Policies SSP1 and SP2 separately (Minutes of Kentish Town Neighbourhood Forum (KTNF), 25 January 2018; Savills-Planning Statement 2019). After arguments with the KTNF and the applicant, Camden Council embraced the opinion of the forum that the site of SSP1 'is not linked to the re-development of the Regis Road site'; reconsidered to 'accept a planning application for the car wash site' (Minutes of KTNF, 19 July 2018).

The KTNF supported this proposal but did not refer specific policies of KTNP on their comment. The forum felt that the applicant reflected the aspiration and priority of the KTNP on the proposal:

We note that the application scheme reflects the important intentions set out in the Neighbourhood Plan; specifically, the access onto the Murphy site, the prominent design of the building, and its response as a marker for the future Kentish Town square, and the provision of a wider pavement to accommodate those queuing for buses on Highgate Road. ... KTNF supports this application (Consultation response of the KTNF 2019).

However, the KTNF recounted that there were internally different views within committee members of the forum in terms of a high-quality design: *'There have inevitably been individual aesthetic views about the details of the design of the façades, individual comments on height and massing, design treatment of the top two floors, and the relationship to the adjoining terrace. However, these comments are those of individuals and do not represent a collective view that warrants a comprehensive objection'* (Consultation response of the KTNF 2019).

Notably, there were a high percentage of objections from public consultation responses of local groups and adjoining occupiers. The scheme was supported by the KTNF but faced a number of objections from other local groups and individuals over issues including its height. Two out of two local groups and 23 out of 25 local people objected this proposal (Planning Officer's report of Reference 2019/0910/P). One councillor of the Planning Committee at Camden described that the 'current' KTNF supported the proposal and 'felt it was in line with what they wanted for that sit', whilst some other local people including those who 'were previously involved in the forum' objected to the site (PC1). In other words, one local group involved in the production of the KTNP objected the proposal, whilst the KTNF supported it. In this sense, one planning officer raised the concern about the representativeness of the KTNF (PO1). This may lead a significant controversy regarding the representativeness of NDPs

which are produced by NFs, unless the forum is able to represent inclusively the whole communities. This implies that local individuals and groups can have similar stances or substantial different perspectives from NFs in each case and accordingly may suggest that the NF need to keep a close relationship with local communities to have one voice in order to accomplish intentions on HNP, like Hampstead Neighbourhood Forum (see Section 5.5.4). This also indicates that members of KTNF change over time, as members of the forum are changed mainly due to moving out and moving in the KTNA and the committee members of the forum is regularly elected, according to the minutes of KTNF's meetings.

I had an application which went to committee but there were still objections from a lot of people who lived in that area, but the Kentish Town Neighbourhood Forum supported the application. There were still objections from a lot of people in the area, so obviously they do not talk for everyone in the area (PO1).

In this regard, different stakeholders perceive or understand meaning and intention differently in terms of the interpretation of the policies of the NDP. For example, the KTNF and the Camden's independent Design Review Panel (DRP) were satisfied about the size and design of the building for 'SSP1', while some local groups and communities opposed to this proposal on the basis of the same policy. A range of issues relate to mainly affordable housing, mass and height, while this proposal was commented as a very high quality and an exceptional building from the Camden's independent Design Review Panel (DRP) which comprises a number of experience architects, urban designers and landscape architects (Planning Officer's report of Reference 2019/0910/P, paragraph 4.42-4.52, 12.25-12.28; Planning Statement of Reference 2019/0910/P).

We consider it is at least 2 stories too high and in style and height totally out of keeping with the surrounding buildings. (from the consultation response of Bartholomew Estate and Kentish Town Conservation Area Advisory Committee; Planning Officer's report of Reference 2019/0910/P, paragraph 4.42-43)

It is worth noting that supporters and objectors indicated that their view is based on the same policies of the KTNP. It implies that any word or sentence, which can be interpreted in various ways, may result in a different perception and conception. Consequently, this matter caused conflict of interests in Kentish Town. For instance, some objectors referred to the same policy of the KTNP as evidence for their reason and justification:

[Name of a local group] considers this proposal, for a seven storey development, is far too high for the site, and a case of over-development which will dominate the surrounding area.

The Kentish Town Neighbourhood Plan states on p. 49: “The design of the new building will respect and be sensitive to the height of existing buildings in their vicinity and setting.” The proposed building can hardly be said to respect and be sensitive to buildings in the vicinity. The building next door, 379 Kentish Town Road, is five stories high and that is quite high enough. (from the consultation response of one local group on Reference 2019/0910/P; Planning Officer’s report of Reference 2019/0910/P, paragraph 4.44-45)

Does not comply with the KTNP which states ‘the design of the new building [on this site] will respect and be sensitive to the height of existing buildings in the vicinity and setting’. (Planning Officer’s report of Reference 2019/0910/P, paragraph 4.51)

The policy SSP1 of the KTNP seems to be open to interpretation in various ways, for example, ‘sensitive to the height of existing buildings in their vicinity and setting’ and ‘high architectural quality’ (KTNP, 2016, p. 49). One officer pointed out that the issue of interpretation may result from the flexibility of the policy: ‘In some ways, it was specific, but in other ways, it did leave a little bit of room’ (PO1):

In terms of the car wash site, because, in some ways, it was specific, but in other ways, it did leave a little bit of room. ... The actual policy is quite flexible, it's just saying mixed-use and that they want the bus stop to be relocated. The supporting text goes into more detail, but even then, I think it allows some flexibility (PO1).

This conflict raised the question about representativeness, since it seemed that the NF did not represent the local people for the whole of KTN. One planning officer at Camden illustrated that the KTNF obviously ‘do not talk for everyone in the area’, and added that ‘there is fragmentation’:

There was another group called [Name of a local group] which objected to my scheme. ...The Kentish Town Neighbourhood Forum supported it and then [Name of a local group] objected, so you can see that there is fragmentation. That the community is not one thing. ... Lots of different groups and some who may be more or less affected by a proposal. ... my proposal was on Kentish Town road, and so this action group may be much more impacted by changes to Kentish Town road than their neighbourhood forum. Kentish Town Neighbourhood Forum is looking at the whole area, whereas this particular action group is only interested in maybe a specific area. Their concerns are more about that particular road, whereas the Kentish Town Neighbourhood Forum has more holistic view (PO1).

The planning officer referred to Policies SW1, SW3, D1, D3, D4, GO3, CC1, CC2, SP1, SSP1 and Appendix 1 of the KTNP on the report for planning decision, and recommended to ‘grant conditional planning permission subject to a Section106 legal agreement’, by concluding: The proposals display a considered and creative design response to this site, regarded as an eyesore by the community. The development shows generosity to the public realm, and would help to activate and enhance this part of the town centre (Planning Officer’s report of

Reference 2019/0910/P).

On 8 August 2019, members of the Planning Committee voted put the majority of votes in favour of the application, assessing the planning application against the KTNP: 'to what extent the aspirations in the Neighbourhood Development Plan to develop Kentish Town Square should be taken into consideration in determining the application, the height and viability of the proposed development compared to other buildings in the area, lack of affordable housing and the impact of the loss of light on surrounding buildings' (Minute of Planning Committee of Reference 2019/0910/P).

This case shows how the policies of KNTF were influential but differently used by actors at key stages during decision-making. The developer held several meetings with the local people and the KTNF and submitted a community involvement statement which is required by the KTNF. However, there were still controversies between the KTNF and other local individuals and organisation and even within the KTNF over the interpretation and perception of the policy of the plan. This represents that each audience of the plan had different perspectives even on the same policy throughout the process of decision-making on the planning proposal. That is, the effectiveness of the KTNF varies with attitudes and inclinations of actors. The conflicts between the forum and local communities raised a question whether a NF fully represents local people, since this matter in turn causes the representativeness and justification for a NDP which was produced by the unrepresentative forum. Moreover, this exploration suggests that better policies might have helped but ultimately the plan is limited in its power to secure agreement in the discretionary planning system in England. This means there is a need for ongoing work and debate, while it may also a significant challenge for NFs to sustain this.

Application 2019/3007/P and Policies SW2 and SW3

An application (2019/3007/P) was submitted on 30 July 2019 and its locations is on the Kentish Town Road and within the KTNA. The scheme aimed:

'for the change of use of the existing retail unit (Class A1) at 167-169 Kentish Town Road to a part hot food takeaway (Class A5), part retail use (Class A1). The proposals include the subdivision of the existing shop to create two separate units, one at 167 and one at 169 with

their own independent access to front and rear. The proposed unit at No.167 would accommodate the takeaway use with the unit at No.169 remaining in retail use.’ (Planning officer’s report of 2019/3007/P, paragraph 1.1).

This proposal conflicted with the Policies SW2 (Protection of secondary shopping frontages) and SW3 (Consecutive secondary shopping frontages) of the KTNP which were established on the basis of the field survey of the KTNF in order to protect and promote the retail function and character of the area in the Kentish Town Centre. The application was objected mostly by local organisations and ward councillors, and refused under delegated powers on 31 March 2020 as the case planning officer recommended.

The Camden Planning Guidance - Town Centres and Retail (2018) states that ‘the Council will not grant planning permission for development which results in the proportion of ground floor premises falling below 50% in a secondary frontage and will seek to resist more than 3 consecutive premises being in non-retail use’ (Planning officer’s report of 2019/3007/P, paragraph 2.3.3). Furthermore, Policies SW2 and SW3 of the KTNP are more restrictive ‘in its protection of secondary frontages and seeks to resist proposals that would result in less than 60% of premises being in retail use or more than two consecutive frontages being in non-A1 Retail usage’ (KTNP, 2016, pp. 18-19; Planning officer’s report of 2019/3007/P, paragraph 2.3.4). In addition, the Policies SW2 and SW3 state that a marketing report and financial viability assessment should be submitted and ‘applicants should be to fund a “peer” review of both the marketing report and viability assessment’ (KTNP, 2016, pp. 18-19).

The applicant did not cite the KTNP, but the proposal was objected to mainly on the basis of the KTNP. The KTNF commented: ‘Unless the conditions set out in SW2 have been fully complied with (including peer review), we ask that this planning application be refused.’ (Consultation response of KTNF on Reference 2019/3007/P). Moreover, a local group quoted the Policy SW2 of the KTNP to object the proposal. This local organisation specifically calculated that the scheme may result in less A1 Retail usage in Secondary Shopping Frontages than the 60% required in the KTNP, emphasising that the applicant did not submit relevant documents and peer review. One ward councillor also objected it and responded that: ‘the Kentish Town Neighbourhood Plan in relation to this, and how this will be used in determining an application. [Name of a local group] have referred to this plan extensively’.

The planning officer recommended that the application be refused permission. However, the

officer drew different calculation from the local group and stated that the development would be conformable to the requirement of the local plan and the KTNP. However, the calculation of the planning offer does not necessarily conform with policy. Notably, if the scheme may cause 4 non-retail use out of 9 units on ground floor, it would result in 44.44% of non-retail units and 55.56% of retail units. Therefore, as the group noted, the application may not be in conformity of the Policy SW2 of the KTNP.

The current application would sub-divide the existing shop back into two separate commercial units (one below 167 and one below 169) which would have been how the site was originally laid out, thus creating 9 units within the shopping frontage. Therefore, taking into account the existing non-retail uses in the frontage, the proposed change of use would result in 4 ground floor premises being in non-retail use. Approximately 66% of the frontage would be retained for retail purposes which complies with the minimum percentages stipulated in both the KTNP and the Local Plan (Planning Officer's report of Reference 2019/0910/P, paragraph 2.3.5).

In the decision notice, the LPA refused the scheme with three reasons, particularly referring the three policies SW2, SW3, and D3 (Design principles) of the KTNP. The reason relating to the SW2 and SW3 is:

The proposed development, on account of its position in close proximity to residential dwellings and other food, drink and entertainment uses in the vicinity, would result in an overconcentration of food, drink and entertainment uses which would cause unacceptable harm to the character and function of the designated retail frontage and wider town centre area, and the amenities and health of neighbours and the local community, contrary to policies A1, A4, TC2 and TC4 of the Camden Local Plan (2017) and Policy SW2 and SW3 of the Kentish Town Neighbourhood Plan (2016) (Decision notice of Reference 2019/0910/P)

The applicant did not cite the KTNP at their own discretion but the proposal was reviewed by consultees and planning officers on the basis of the policies of development plan including the NDP. It indicated that the KTNP was influential in the determination of the planning application by providing locally-specific topics for discussion. Furthermore, it is worth noticing that particular policies of the KTNP 2016 can override those of the latest Camden Local Plan 2017 and Planning Guidance 2018, even although the up-to-date plan has generally a precedence over other plans in the English planning system (Camden Local Plan, 2017; Camden Planning Guidance, 2018). It, however, is noteworthy that these policies relating to the retail unit became invalid due to the changing policy of the central government (see more 5.4.5).

5.4.6 Role of the neighbourhood forum post-approval

This subsection explores the status and role of Kentish Town Neighbourhood Forum (KTNF) post-approval and their activities to influence implementation of Kentish Town Neighbourhood Plan (KTNP). During the preparation of the plan, local communities worried that KTNF might disperse after referendum. The forum accordingly responded that they 'will continue in some capacity to interpret policy and perhaps have a wider role as yet to be defined' and set forth 'delivering and monitoring the plan' on the KTNP (KTNP, 2016, p. 60; see also Minutes of Kentish Town Neighbourhood Forum (KTNF) 2015). The forum was re-designated for another 5 years on 1 June 2018 and continually keeps working after the plan was made in 2016.

The KTNF internally employs meeting and voting as communication tools to defuse conflicts and to reach a consensus since the production of the plan (KTNP - Consultation Statement 2011-2015; Minutes of KTNF, 2017; 2018). As discussed in Section 5.4.2, the forum holds regular meetings and shares their minutes with communities in various ways. The KTNF utilises voting to decide significant agendas, for example, to elect members of the KTNF Committee (Minutes of KTNF 2012). Moreover, according to the minutes and website of the KTNF, the forum focuses on external activities to achieve the vision and objectives which are articulated in KTNP. They continue to comment on planning applications as a statutory consultee and to have meetings with landowners for developments within the Kentish Town Neighbourhood Area (KTNA) (Minutes of KTNF 2017-2020; Kentish Town Neighbourhood Plan (KTNP) - Consultation Statement 2011-2015; PC1). They also work by: monitoring development activities; tracking changes to policies of local plan, London Plan and National Planning Policy Framework (NPPF); preparing the revision of the KTNP; and communicating with public or private organisations including Campaign for Real Ale (CAMRA), Transport for London (TfL), and Govia Thameslink Railway; and meeting with council officers.

In particular, as discussed in Section 5.4.3, the KTNF worked with planning officers and Dartmouth Park Neighbourhood Forum (DPNF) to produce the Kentish Town Planning Framework (KTPF) as 'a supplementary planning document' of Camden Council, since the KTNF is mentioned as a partner in the Camden Local Plan 2017 and most of projects in the KTPF are located within the KTNA (Camden Local Plan 2017, p. 30; PC1; PO2; see also Minutes

of KTNF, 24 January 2019).

Kentish Town ... They very much get involved in that. As a council, we've done some planning framework, area planning framework for that area, and they were very involved in that and we work with them on that. I know, they have a meeting where they meet with the landowners and things as well. ... They're very involved in what's happening in their area, and probably through the neighbourhood plan they kept on going now. They're still trying to go through development (PO2).

Inclusive involvement

The KTNP set out two Policies CC1 and CC2 which are procedure and clearly designated to ensure effectively ongoing engagement in the process of decision-making beyond merely commenting on planning proposals. The Policy CC1 'pre-application consultation' indicates that applicants proposing major developments 'are strongly encouraged to actively engage in consultation with KTNF and the wider community' 'as part of the design process prior to any planning application being submitted' (KTNP, 2016, p. 33). In addition, the Policy CC2 'statement of community consultation or statement of neighbour involvement' implies that developers 'proposing major developments or proposals involving community uses are strongly encouraged to submit a Statement of Community Consultation to KTNF and LB Camden. Applicants proposing demolitions, extensions or conversions to residential buildings and demolitions, extensions or change of use to non-residential buildings are strongly encouraged to submit a Statement of Neighbour Involvement' (KTNP, 2016, pp. 33-34).

These policies provide an opportunity for local communities and groups to participate in the process of decision-making and to reflect their aspirations and intentions on proposals prior to submission of proposals. It means that the policies are likely to help to ensure that plan makers and those who are affected can engage in the production of proposals effectively and practically prior to the submission. The submitted statement (CC2) can be considered as an official document and consequently is expected to be taken into account by decision-makers in determination of planning applications. For example, during the preparation of a planning application, one applicant performed 'pre-application consultation (CC1)' and submitted 'Statement of Community Involvement (CC2)' in the light of the policies of the KTNP in order to develop the Car wash site which was designated for Policy SSP1 of the KTNP (Reference 2019/0910/P).

In this sense, it is advantageous to applicants since they can avoid misinterpretation and misunderstanding of concerns and aspiration of local communities and the KTNF prior to the submission, and their performance shows the application considers and reflects the intention of the KTNF. It is also beneficial to decision-makers as the local planning authority (LPA) can know how the applicant take the KTNF into account. It means that these policies would have an impact on the perception of actors when the application is prepared or assessed.

5.5 Hampstead Neighbourhood Plan

5.5.1 Background and motivations

Hampstead Town is geographically located to the north of Camden. Hampstead is considered as an attractive and historic neighbourhood area and Hampstead Heath is a key open space within the Borough of Camden. (Camden Local Plan 2017; HNP 2018, p. 7). Hampstead Town Centre is regarded as one of the smallest centres in the Camden Borough, whilst there are ‘the high-quality environment and up-market shops, cafés and bars’ (Camden Planning Guidance (CPG), 2021, p. 68; PO5; PO7). Furthermore, the town centre ‘is not considered to be highly accessible by public transport and therefore significant growth is not expected in this area’, even though it is just a few miles from the centre of London (Camden Local Plan 2017, p. 12; p. 36; p. 179; see also HNP 2018).

The population of Hampstead Town has slightly grown from 11,270 in 2011 to 12,100 people in 2019, which was ranked 16th of 18 wards by population size in Camden, but the figures are forecasted to decrease over the next 10 years until 2029 (Camden Council, 2020). In particular, ‘Hampstead Town has a relatively old population profile’ compared to overall ages of Camden and ranks 17th youngest ward (Camden Profiles 2020). In contrast to the population, in terms of the economic status, household income in Hampstead Town ranks the highest for household incomes in Camden (Camden Profiles 2020).

The extensive development of Hampstead from the 17th Century has been managed in accord with the green landscape of Hampstead Heath (HNP 2018, p. 7). Hampstead is well-developed area with listed buildings and almost entirely covered by the designation of conservation

areas, and consequently fewer sites are left for large-scale developments (NF1; NF2; PO3). Such environment set the feature of HNP, as will be discussed in 5.5.3, as a development plan is a product of interactive contexts (Healey, 1993).

In Hampstead it's a very historical neighbourhood with many, many listed buildings and very little room for growth, but a lot of pressure on development because property is very high value (NF1).

Whereas in Hampstead, the number of big sites for development is almost zero, it's rare that one comes up. We have a highly developed area, there's no space at all (NF2).

Hampstead, as you rightly say, it's largely if not almost entirely covered over by conservation area designation. That makes, I think, the scope for delivering significant amounts of development very, very difficult. There are very few obvious development sites in Hampstead. ... Generally speaking, there's very limited opportunities to deliver large housing schemes there (PO3).

Due to a small developable space, Hampstead has faced a lot of pressure on development for high value of properties, whilst small and affordable properties are needed (NF1). A robust property market leads to constant demand for development. Property owners are accordingly keen to 'expand available space and enhance values', for example, 'through the addition of basements', and consequently this tendency causes tensions resulting from the adverse impact of construction (HNP 2018, p. 7).

We find that the smaller, more affordable property we were losing it particularly with Council Housing. There's not much we can do about that because of national regulations that allow people to sell their council properties or to buy their council properties. I think the general feeling was that the character of Hampstead, the people who could live here was changing because of the pressure on development and getting as much as you can for properties (NF1).

In this context, local people sought to influence developments and the future of their area and they consequently expected that particular concerns can be addressed through their own NDP (HNP 2018, p. 7-8; PO3; NF3; PO5). In consequence, Hampstead Neighbourhood Plan (HNP) was made in October 2018.

Many people in Hampstead ... wanted to have a say, they wanted to be able to influence the future of their village. ... There's a great sense of community. ... They wanted to be able to influence what goes on and ensure that future developments were sensitive to all of the good points about Hampstead and the reason why they moved there, and emphasise those good points rather than undermining them (NF3).

5.5.2 Preparation and adoption of the neighbourhood plan

In October 2014, the London Borough of Camden approved the designation of the Hampstead Neighbourhood Forum (HNF) and Area (HNA). Back in 2013, one local conservation group was involved in local neighbourhood organisations and launched a public meeting to discuss whether a NDP would be reasonable and beneficial for Hampstead. They learned about ‘the Localism Act 2011 and the authority that it gives local communities to develop their own Neighbourhood Plans’ (About the Forum: <https://www.hampsteadforum.org/about>). The working group recognised that a bespoke plan could shape the future of development and protect unique characteristics of Hampstead (Ministry of Housing, Communities & Local Government (MHCL), 2020).

The HNF proceeded to establish itself through consulting local residents on their concerns and aspirations. They proposed a constitution and boundaries to be planned, and a committee of HNF was elected at the Inaugural annual general meeting in March 2014 (NF2). The HNF and HNA were formally approved by London Borough of Camden on 7 October 2014. In the first year, the HNF refined aims and objectives of Hampstead Neighbourhood Plan (HNP) through a number of community engagement events which helped to recognise and articulate what local people were hoping to achieve (MHCL, 2020). Over the following four years, the HNF continued to re-draft and develop the plan numerous times, followed by two public consultations and scrutiny by an independent examiner (HNP 2018, p. 8). The HNP successfully passed referendum with 91.5% support on 21 June 2018 and was adopted by Camden Council on 8 October 2018.

The HNF is entirely made up of volunteers who have a range of skills and the forum claims to have close relationships with local councillors and Council Officers (NF1; NF2). Members of the HNF have diverse interests and professional knowledge such as architecture, transport, environment and trees, with a broad array of experience including community engagement, sustainability, education, business, finance, public relations, journalism, law, architecture, information technology, and web and graphic design (NF2; MHCL, 2020; Hampstead Neighbourhood Forum (HNF), 2020). Despite the abundant capabilities, local people needed to have knowledge and ability to write plans to enhance the impact of their NDP, and therefore they relied heavily on guidance from Camden Council officers, Locality and

consultants paid for with government money (NF2; HNP 2018; MHCL, 2020). In this regard, the HNF emphasised that a productive relationship with the LPA is the key to the success of neighbourhood planning (NF1; NF2), since Council officials ‘were helpful in guiding us through the processes of drafting and approval’ (HNF, 2020). Furthermore, ward councillors joined as ex officio committee members and were keen to progress the whole process (MHCL, 2020; NF2).

We did work very closely with the Camden Planners when we developed the neighbourhood plan. There was not anything in there in particular that they did not agree with. We worked that out through the process of drafting the neighbourhood plan. We feel that it has been effective (NF1).

People have to know how to phrase things in order to have effect. Just as somebody who writes legislation, we have civil servants who are used to writing, who are experienced in writing legislation so that the laws have effect, so obviously, we had a relationship with them. Obviously, they did not say what we should say in our policies (NF2).

Participation and consultation

All members of the HNF who participated in the interview significantly emphasised that ‘public consultation’ was a substantial factor in the production of the HNP (NF1; NF2; NF3). The HNF highlighted ‘to reach a consensus through public consultation on’ what residents hope to achieve for those who are interested in the creation of a NDP, adding that the process of neighbourhood planning can follow the clear direction by beginning ‘with solid evidence of what local people want’ (MHCL, 2020). Policies of HNP derived from the intense public consultations that HNF carried out with residents over a period of five years from 2014, including ‘large public meetings, many smaller meetings, circulation of a Vision Statement which received hundreds of comments, and circulation of drafts of the Plan for public comment’ (Hampstead Neighbourhood Forum (HNF), 2020). In this sense, neighbourhood planning provides some indications of a better way forward due to ‘its highly consultative nature’ (MHCL, 2020). The HNF illustrated that the NDP as ‘a product of public consultation’ is powerful, describing that ‘the Hampstead Neighbourhood Plan is the result of long and intense public consultation. ... the Localism Act of 2011 offered the opportunity to give a greater voice to Hampstead residents’ (NF2; HNF, 2020).

We needed to show the consultation that we undertook in developing the neighbourhood plan. We talk a lot in that about why people wanted a neighbourhood plan for Hampstead. In

that, we talk about how people wanted a sense of ownership over decisions that affected them locally (NF1).

It's the product of public consultation. The fact that it's a product of public consultation is very powerful. It's powerful with Camden, with councillors, and officers, hopefully. It just is an extra tool that people can draw on. ... Having a plan and having it originating from public consultation just gives you something extra. (NF2).

The important thing is really, in our consultation, we tried to be as broad-based as possible, and ensure we spoke to all parts of our community. We tried very hard to bring together their different views and produce policies that they could agree on. For example, in the transport area, a major local issue is parking, so we had a lot of debate amongst local people. What we tried to do was to synthesise that and then focus the policies in our plan on the things that people could agree on (NF3).

The HNF created the Vision Document which set broad objectives deriving from several public consultations. This statement was circulated to all homes within the HNA with an invitation to comment (HNP 2018, p. 8). The result of about 400 responses shaped the first draft of the HNP (HNP 2018, p. 8). Participants represented that there was no significant onerous or contentious issue during the preparation of HNP although 'slightly different views' were relating to the items and its level of policies, as will be discussed in the next subsection 5.5.3 (NF1; NF2; NF3). One member of the forum also claimed that the HNP consequently was supported by the majority at referendum, since the plan was made on the basis of participation of communities through various ways (NF1).

You consult and you consult and you consult again, and eventually you get the majority opinion and a consensus. Not everybody is going to agree, but you buy consulting over and over again. We will find out what policies are broadly supported in the area. To be honest, we did not get a lot of contrary opinions. Our neighbourhood plan passed with over 90% approval. (NF1).

Process and challenges

For HNF as voluntary citizen-planners, the preparation of HNP is regarded as difficult due to the long process and the complex and hierarchical planning structure in London, while the forum had confident and optimistic aspirations to achieve vision and objectives to improve the local area and cope with local-based issues and concerns that the local plan insufficiently can address at the borough level. Regardless of ambitious willingness, the NHF highlighted that the challenge 'during this long slog was keeping up the momentum', setting deadlines for themselves and 'staying enthused' (HNF, 2020).

You do not want to spend years on working on your plan and then find that you've got a policy in there that is completely unacceptable. That affects the process as you go through it. This was a process of years. The drafting of the plan took two to three years. ... It's a long, long process. That process, even by itself, has an effect on the drafting. You're going to get to something that represents a consensus in the end (NF2).

There is a lot of material to be considered as part of neighbourhood planning, since a NDP has to comply with higher level policies for meeting 'basic conditions' which to be assessed at the examination phase before the adoption. In particular, there is another layer of plan called London Plan in London with the National Planning Policy Framework (NPPF) and each borough's local plan. The basic conditions are regarded as a barrier and a time-consuming process, since '80% of the work of our neighbourhood plan was to comply with the basic conditions', as one forum member described that this situation as 'a very bureaucratic system' (NF3). Due to such complex planning structure to citizen-plannings as non-planning professionals, the HNF employed a consultant for a health check of their NDP regarding the basic condition in order to 'predict what the independent examiner' would say and accordingly convince the examiner that a plan meets the basic condition (NF3). For this, Parker, Lynn, and Wargent (2015, p. 531) express such attitude as a 'safety first' mode to complete the process of neighbourhood planning without risk rather than adopting innovative approaches.

The most time-consuming bit was negotiation with the local authority, Camden Council, to make certain that the plan had their support, and to ensure the plan was consistent with the basic conditions. ... For a neighbourhood plan to be able to be passed at independent examination, it has to fulfil what are called the basic conditions ... We had to make certain that our neighbourhood plan was consistent with the National Planning Policy Framework, the London Plan, and the Camden Local Plan. Each one of those plans referred to supporting documents. The Camden Local Plan refers to about 10 different supplementary planning documents. There's a lot of material we had to make certain we were conformant with. That was the most difficult part (NF3).

Even after we'd done all that work, we had to employ a consultant and pay about £5,000, for a consultant to do what was called a health check of our neighbourhood plan (NF3).

It is worth noticing that a style of preparation of neighbourhood planning varies with the attribute and perspective of neighbourhood planning groups (NPGs), one forum member described below (NF2). For this, a NDP is 'the product of interaction with local people' (Healey, 1993, p. 99).

I can imagine a situation where you have people on your committee who want it to be much more radical, and some people who are much more conservative, say. I can imagine a

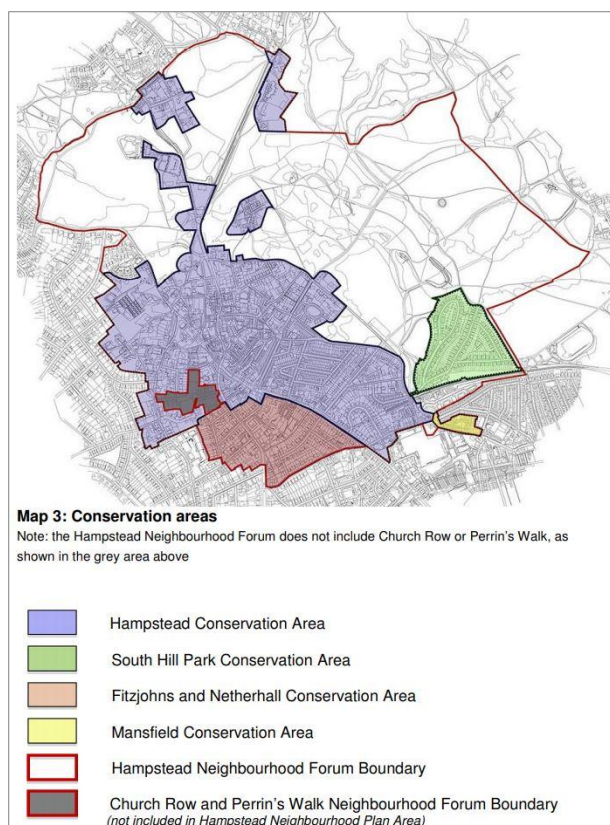
committee of a neighbourhood forum developing like that because it's a pretty random process who gets to be on the committee. ... There would have been issues on which there were divergences of view and differences of emphasis, but we did not have any really hard issues like that to resolve (NF2).

Neighbourhood area

The boundary of Hampstead Neighbourhood Area (HNA) for HNP crosses three wards. The HNA is engaged with three wards which include Hampstead Town ward with small parts of Gospel Oak ward and of Frognal and Fitzjohns ward within the Borough of Camden. It means that neighbourhood planning cuts across three different electoral wards. Other included wards are relatively much smaller than the Hampstead ward and the different wards did not bring any significant controversy during the production of HNP (NF2).

There were arguments, though, about other areas on the borders of our area, whether people wanted to be part of our forum or not, individual streets. There were some discussions like that. ... It's much better if the whole plan area is within the same borough. ... We're not all in the same ward, so we do have little areas that are not in Hampstead Town ward, but our areas are mostly Hampstead Town ward. ... They've hardly ever come to our committee meetings because only a tiny part of their ward is in our area (NF2).

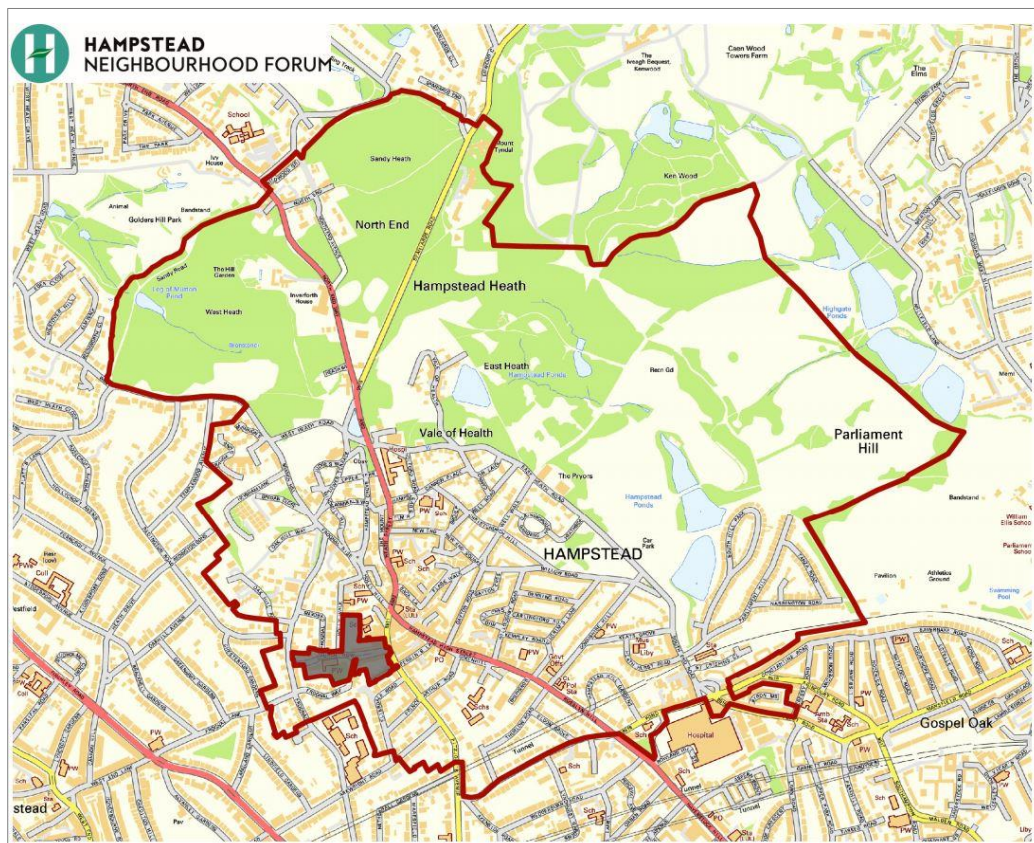
Figure 10 Map of Conservation areas within Hampstead Neighbourhood Plan Area (HNP 2018, p. 15)



A small gap is within the boundary of the HNA. Negotiation with vicinal areas and residents commonly happens during the designation of neighbourhood areas and forums as one forum members. For example, the Kentish Town Neighbourhood Forum (KTNF) had had several meetings with stakeholder and members of the neighbourhood forum to deal with them (Section 5.4.2).

We just have a plan that has a gap in it. It doesn't matter that much. Just an anomaly (NF2). Church Row and Perrin's Walk areas are located in the boundary of the Hampstead Neighbourhood Area (HNA), but excluded both HNF and the HNA, as they separately designated their own NF to preserve their unique and distinct area (NF2; HNP 2018, p. 10; p. 16). The Church Row and Perrin's Walk streets are considered as small but historic place, since there are a lot of more expensive and older houses with the oldest houses in Hampstead (NF2; PO3; NF3). The Church Row and Perrin's Walk Neighbourhood Forum was established in September 2014. However, they did not produce their own NDP and did not further redesignate their status yet in accordance of guidance which a NF is required to re-designate every five years (NF2; NF3; PO3).

Figure 11 . Hampstead Neighbourhood Plan Area (grey area excluded) (HNP 2018, p. 10)



In this regard, one planning officer expressed that the HNA was logically designated on the basis of the perspectives of local people, although the Church Row and Perrin's Walk areas were excluded:

That's an example of a locally determined situation. ... I imagine that Hampstead Forum were asking the local community's views on what their area should be. There's a certain logic that the Hampstead area would include most of Hampstead town centre. That it would include most of the Hampstead conservation area, for example. There were certain things that were logical to do in terms of setting a boundary (PO3).

5.5.3 Overview of content and aims of the neighbourhood plan

After the designation of area and forum of Hampstead Neighbourhood Plan (HNP), the Hampstead Neighbourhood Forum (HNF) endeavoured to collect and identify concerns and aspiration of local people within HNA several years, considering the characteristics of local area and locally-specific issues in particular which local people raised and to transform them into planning policies of HNP. The Hampstead Neighbourhood Plan (HNP) 2018-2033 successfully passed a referendum with higher participation and favour - 91.5% support and 20.5% turnout without substantial conflicts (NF2); and was formally adopted on 8 October 2018. In this regard, the HNF described that policies of HNP have been supported (NF1; NF2; NF3). The concerns and aspirations of local people were investigated through a number of public consultations and they were 'reflected in the policies set out in the sections', as discussed in 5.5.2 (HNP 2018, p. 8).

It was one of the higher ones in the Borough of Camden. ... For most people, a very small issue, so we were quite pleased with it. We did not have anybody shouting against us, which we could have had, but we generally had a lot of consensuses behind us, which is lucky (NF2).

Turnout over 20% is actually quite good for a neighbourhood plan. ... although we got 20%, that's actually on the high end for neighbourhood plans, quite a few neighbourhood plans got 16% or 17% turnout. Again, our 91% vote in favour was quite high. Some neighbourhood plans get 80% or 70%. (NF3).

The referendum. The policies were well supported. It was necessary for us to show that, to demonstrate that our policies were well supported. (NF1).

The policies within HNP have been set out to protect and enhance their developed areas rather than to promote large developments, since most of the Hampstead Neighbourhood Area (HNA) are already well-developed and predominantly covered by villages and open

spaces including the Hampstead Heath which is the largest open space in the Camden Borough.

The members of the HNF also suggested that the effect of the NDP had been limited since the NDP is only related to land-use (NF2; NF3). In other words, the NDP cannot address issues beyond the planning matters. The forum therefore felt the limitation of the HNP to address and reflect fully the concerns and aspirations which local people have considerably concerned, for example, about the transport section as the participants of the HNF expressed (NF2; NF3). As the LPA of Camden stated, 'Some transport matters fall within the scope of planning policy, while others do not'. Under such limitations, the HNF pursued to establish bespoke policies which are in keeping with the local distinctiveness and locally-specific issues of the HNA (NF1), for example, locally-characterised areas, basement construction, traffic congestion, additional schools and air quality, as follows.

The HNF set forth policies in line with the 'the character and the local context' of the Hampstead area (PO1; PO5). The HNA has five-character areas which are identified by history and topography and 'by the "public aspect" of the buildings – the way that built form relates to landscape, open spaces, and streets' (HNP 2018, p. 14). One officer at Camden considered the HNP as an epitome, since this approach adds value through the certain and tailored policy, avoiding the repetition of the local plan and the general guideline (PO1). The design and heritage related policies were influential, since such policies add the extra requirements like restrictions in conservation area for developers even in non-conservation areas (PO5). However, such policies became invalid in the light of the changing policies of the government, after completion of this empirical work. The National Model Design Code forms part of the government's planning practice guidance and all development plans of local authorities should set their design codes consistent with the principles set out in the National Model Design Code (Department for Levelling Up, Housing and Communities (DLUHC) and Ministry of Housing, Communities & Local Government (MHCLG), 2021).

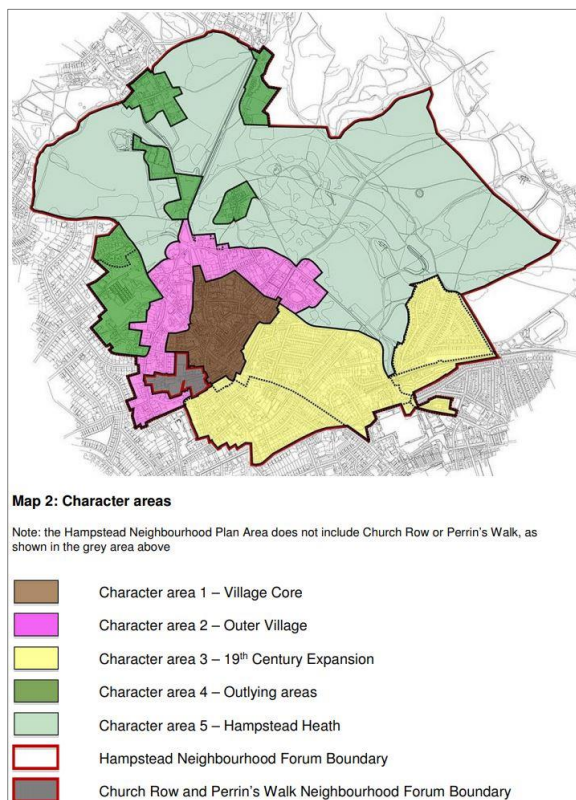
Design and character. We have made many references to the conservation area statements and character assessments that have been done in our plan, to make certain the development is sympathetic to the historic charm of our neighbourhood, and the need for development to emphasise and develop that attractiveness rather than interfere with it or dilute it. (NF3).

The Hampstead Neighbourhood Plan has a design policy. ... A lot of the way the policy is worded, it sounds quite general, development proposals should demonstrate how they

respect, enhance the character and the local context of the area. They break down the whole of Hampstead into different character areas and then they ask for local distinctiveness, so I suppose in that sense, they are adding value (PO1).

It's to do with the design policies and for the heritage policies and their local listed non-designated heritage assets ... If they're not in the conservation area, and but they're in the neighbourhood forum area, then we still have to apply the design policy, slightly more restrictive design policies from the Hampstead neighbourhood forums, to the design, to the planning application. ... It will be more restrictive for developers. ... I think it's a good thing at least, because then when the applicants come in, they know what they're dealing with at least they know that they're in a conservation area, so they have to be respectful of the area. It's just easier for us to apply neighbourhood plans as well (PO5).

Figure 12 Map of Character areas within Hampstead Neighbourhood Plan Area (HNP 2018, p. 15)



Basement development is identified as a considerable concern of local people within the HNA, and HNP allocates three separate policies of total 19 policies including BA1 (Basement Impact Assessments), BA2 (Basement Construction Plans Policy) and BA3 (Construction Management Plans) (NF1; NF2; NF3). The HNF illustrated that some people intend to develop the basement for extra value through extension, although Hampstead has distinctiveness of geographical conditions that basement construction is likely to cause 'structural damage and/or trigger flood risks on susceptible neighbouring properties' (HNP 2018, p. 37, paragraph 5.3; NF2; NF3). The HNF attempted to set 'stronger' policies relating to the basement and added extra

requirements including a consultation statement as ‘evidence of consultation with neighbours prior to the application’ (HNP 2018, p. 44).

Basements are a big issue because a lot of people want to increase the value of their house by building a basement underneath it. ... It's a big local issue (NF2).

Basement development and unsympathetic or predatory basement development is a major problem in our area. ... There is a danger that basement development that is not carefully done could divert streams and cause problems for neighbouring properties. That's one area where we took a lot of time to make certain that our plan could be as strong as possible, to reflect the wishes of local people (NF3).

Furthermore, the HNF employed ‘creative approaches’ to look for planning solutions to particular local issues (MHCL, 2020), beyond the limitation within the frame of planning guidance which is set by the central government. Local people raised substantial concerns regarding air pollution, schools and traffic congestion, but there was a barrier that NDPs only can deal with planning affairs in land-use terms (NF2; NF3). The forum associated the air pollution and additional schools with traffic and transport policies (MHCL, 2020; NF3).

Certain areas of the plan, such as a section on basements and another on traffic and transport, required creative approaches to find planning solutions to issues of great local concern. In one of our traffic policies, for example, we linked development to local PTAL scores, which requires large developments in areas of poor public transport to mitigate potential harm from congestion and air pollution (MHCL, 2020).

The HNF adopted a creative tactic to deal with the air pollution through the transport and traffic section, since the air pollution is less related to the land-use issue (NF3; HNP, 2018). In particular, as the local people sought the air quality to be ‘cleaner’, the HNF therefore surveyed the air pollution to be used for robust evidence during the establishment of policies of the HNP 2018 in 2015 and also did it again in 2021 for the next version of the plan (HNP, 2018, p. 49; NF2). In a similar vein, issues resulting from extra schools are also linked with the transport and traffic policies. The local residents were concerned about the additional school run, since the schools can lead to the potential of the traffic congestion which consequently causes the air pollution (Camden Local Plan 2017; HNP 2018). In this context, the adverse implications of additional schools are frequently mentioned throughout the transport and traffic policies (HNP 2018).

Air pollution ... has become even more important for local people in the years since the plan was drawn up. We would want to look again at the whole area of air pollution to make certain that our plan was as strong as it could possibly be, to ensure that air quality is not diminished. ... What we were successful in doing was to introduce a kind of net zero on air quality. ... I

think we might want to go further than that in the next version of our plan (NF3).

If you look at our plan, air quality figures, quite importantly in our transport section, and we would want to be fostering things that could improve air quality, not just by influencing planning applications, because we feel strongly that that's what people want (NF2).

It's very important on traffic congestion. There's a link with the school run, which is another major problem for us because Hamstead contains a lot of private schools and that generates a big problem with school run traffic (NF3).

The traffic congestion within the HNA is one of main concerns for local people and the HNF therefore set four policies to address traffic and transport issues including TT1 (Traffic volumes and vehicle size), TT2 (Pedestrian environments), TT3 (Public transport), and TT4 (Cycle and car ownership) (NF1; NF3; HNP, 2018). In particular, the forum utilised Public Transport Accessibility Level (PTAL) rating as a useful tool with objective measure to discuss with stakeholders and to avoid misinterpretation and miscommunication relating to the transport policies. For this, they invested a lot of time and effort for clear wording and language for interpretation in order to convey the intention of the HNP to actors (NF2; NF3). One forum member described that: 'We did not want to put in a policy that said there must be good transport, because we knew that our interpretation of good transport might be different to Camden Council's' (NF3). HNP, for example, set forth 'The following types of development will be supported where they are located on sites with a Transport for London PTAL score of 4 or over, up to 2023, and a score of 5 or over thereafter' (HNP, 2018, p. 61). Planning officers accordingly refer to the PTAL level to access a planning application, for instance: 'The site has a PTAL rating of 4, which is a 'good' accessibility level and the site sits within a controlled parking zone' (Report of Planning Officer of Ref 2019/2375/P and 2019/2491/L, paragraph 1.7).

In local terms, when you put in your objection, the words that you use, because they're going to come up almost in court, are going to be very important ... a lot of work went into that objection (NF2).

PTAL is an objective measure, it avoids argument and subjectivity in the planning process ... Clear measures ... no one can argue about that. If we say it must have good transport, then the developer will argue, 'Yes, my site's got good transport.' The council will say, 'No, the site hasn't got good transport.' It's all very vague. We found PTAL very useful because it gives an objectivity (NF3).

These examples indicate that the wording is crucial to communication with each other clearly (Parker, Lynn, and Wargent, 2015), and to interpretation of the policies certainly as the HNP intended, enabling NDPs intactly to deliver intentions and aspirations of local communities to

readers and users who are closely involved in implementation.

I think that is ultimately down to the wording of the policies, and we tried very hard to. We looked time and time again at the wording of our policies, to make certain that, firstly, that there was sufficient context and supporting explanation in our plan, to help the planning officers interpret our policies. Secondly, to make certain that those policies were clear. You've mentioned the example of PTAL. We wanted our policy to be as clear as possible (NF3).

Despite the effort of the HNF for clear and objective wording (NF3), there was still a conflicting word within the HNP in terms of interpretation. One planning officer exemplified Policy HC1 (Housing mix) of the HNP to show that words of policy play an influential role in the interpretation of actors:

Just the wording of the policies, the specific wording. ... the Hampstead Neighbourhood plan HC1, that says, 'We will resist the loss of small dwellings.' It has a 's' on the end, dwellings, and in my view that's quite clear. It just means any dwelling in a conversion would be resisted, but because they put an 's' on the end, some of the legal counsel in the council interpreted that as losing two dwellings. You have to lose two of the small dwellings at the same time, because it said, 'Dwellings,' rather than, dwelling, so that was a legal point, interpretation point (PO4).

5.5.4 Interaction with the Local Plan

As part of development plan in Camden, Hampstead Neighbourhood Plan (HNP) has a distinctive relationship with Camden Local Plan, since the preparatory periods of both plans overlapped. The local plan was adopted on 3 July 2017 and HNP was produced on 8 October 2018 (Camden Local Plan 2017; Hampstead Neighbourhood Plan 2018). The Camden Core Strategy 2010 and Development Policies 2010 were replaced with Camden Local Plan in 2017 during the preparation of the HNP. Hampstead Neighbourhood Forum (HNF) was aware of the emerging local plan during the preparation. However, Camden Council referred to Hampstead area itself rather than the HNP in the local plan, since there is to the potential uncertainty whether NDPs which are prepared will be completely produced and adopted, one planning officer illustrated (PO3): 'Regardless of whether there's a NDP or not, we have had to ensure that there is a suite of policies that covers alongside the relevant issues for the whole of the borough', adducing an example that Church Row and Perrin's Walk Neighbourhood Forum was designated in Hampstead but did not produce a NDP, as discussed above in 5.5.4.

We have already largely planned and written a local plan that works for the whole of the borough because part of the difficulty with the neighbourhood planning process is you don't ultimately know for certain whether a community will actually be able to complete the neighbourhood planning process (PO3).

Within the hierarchical planning system in England, the HNP were required to meet basic conditions and comply with higher level plans (HNP 2018; London Plan, 2021; see more: Appendix 1 - Evidence Base of Hampstead Neighbourhood Plan). In this regard, one forum member considered it as 'top-down approach' and 'bureaucratic system', since this planning structure of London in turn 'makes it very difficult for neighbourhood planners' (NF3). Members of the HNF accordingly pointed out that the NDP is limited and cannot be different from higher level policies, and the NDP consequently cannot reflect fully the aspiration of local people (NF2; NF3).

You cannot just write whatever you want in a neighbourhood plan because you are not allowed to diverge, really, very far from the borough local plan, the Camden, in our case, local plan, or from the National Policy Planning Framework, the NPPF. There's also a London plan. There are various different levels of planning. You can push things in certain limited areas, but you cannot really diverge. You cannot have a policy that is diametrically opposed to what is, say, in the Camden plan (NF2).

It constrains what the local community can do and means that every word in a neighbourhood plan has to be cross-checked against those higher-level plans. It makes the process of neighbourhood planning very cumbersome (NF3).

It is bound by, as I said, conformity with the National Planning Policy, all these other plans. That means that it cannot truly reflect the wishes of local people in all respects. To that extent, it is not fully able to achieve the desires of local people. All it can do is reflect the wishes of local people that don't conflict with the National Planning Policy Framework, the London Plan, and the Local Plan (NF3).

Despite the limitation of potential of the HNP and discretion of the HNF, the HNF still regards a local plan as a necessary guidance along with a NDP, representing that 'the Neighbourhood Plan co-exists with and is complementary to the Camden Local Plan. The Local Plan is far more extensive, professionally produced, and contains detailed policy guidance intended to meet most planning eventualities in a large and diverse borough' (HNF, 2020). The forum also states that policies of local plan 'have been developed on the basis of decades of local experience and engagement with the public. Whether or not one agrees with particular policies, they represent the only detailed guidance on planning matters, and they are tailored to meet the particular characteristics of their area' (NF2; HNF, 2020). This indicates that local plans and NDPs are closely interacted within the hierarchical planning structure in England.

Repetition and extra value

Policies of NDPs need to sharpen those of local plans, rather than repetition or confrontation, since repetition can undermine the effectiveness of NDPs. Planning officers significantly revealed that NDPs frequently duplicate or repeat policies which are already in the local plan or London Plan (PO1; PO4). London Plan also highlights that all those involved in planning and development 'do not seek to duplicate policy or evidence unnecessarily' (London Plan, 2021, p. 6). The HNF was already aware that the local plan had been updated during the preparation of the HNP and therefore attempted to avoid duplication of the local plan and to add extra value (NF1). In other words, the forum was cautious about repetition of what was already in the local plan and rather focused on more specific requirements at community level. For example, Camden Local Plan set out the car-free policy and 'additional parking is not permitted' in any new development; and the forum accordingly 'did not have to repeat' that in the HNP since it was already covered (NF1).

The local plan did evolve as we were preparing the neighbourhood plan. We were aware because their plan took a long time as well. We were aware of what was in their emerging plan. We're able to accommodate that. What we did not want to do was just to repeat everything that was in the local plan. That was not our objective at all. What we wanted to do was to add extra value toward the policies that were already in the local plan (NF1).

Despite the deliberation of the HNF, one planning officer revealed that the HNP still has repetition of the local plan:

Another policy in Hampstead is the biodiversity corridors, where they try and protect biodiversity. We already have specific policies about when biodiversity reports are required, and where it's quite clear that biodiversity assessments needed based on the scale of the proposal (PO4).

The HNF sought to add value to the local plan by setting out more additional requirements rather than 'merely' duplication from the local plan, for example, basement, air pollution and housing mix. The forum undertook a lot of public consultations and surveyed the condition to establish bespoke policies of the HNP to deal with locally-specific issues within the Hampstead Neighbourhood Area (HNA). However, there is still a conflict, for instance, between Policy HC1 'Housing mix' of the HNP and Policy H3 'Protecting existing homes' of Camden Local Plan, as one officer displayed below (PO4). Notably, however, it is notable that some conflicting policies are left even after passing all process while planning officers are involved in the production of a NDP and the draft plan is tested by the independent examiner prior to the

adoption.

I'm thinking of the Hampstead Neighbourhood Plan policy HC1, which restricts the loss of one-bedroom and studio units in Hampstead because there's a lack of supply or there is a shortage, an identified shortage of smaller units. It's particularly stopping conversions of flats into houses. You're losing a dwelling to create a larger dwelling. The thing is that in our Local Plan policy we have policy H3, where we permit the loss of one unit to allow families to expand. Also, because of the fact that is not development, in a lot of cases, it does not fall within the definition of development in the Town and Country Planning Act, section 55. Because it's not materially changing the use of a building and a lot of circumstances, and it's just internal alterations. That's an example of a policy, which is clearly in conflict. I think it's a pretty good policy because it's based on evidence. It's based on the fact that, in Hampstead, there's a lot of people who are buying up lots of flats and they already have big houses, big flats, and they want to have more space for whatever reason. On the other hand, yes, there's a lack of supply, there's more units. It's a difficult one in terms of just justifying it. That's an example of a real conflict with the Local Plan (PO4).

5.5.5 Role of the neighbourhood development plan in decision-making

This section scrutinises the use of Hampstead Neighbourhood Plan (HNP) in the process of decision-making by quantitative and qualitative approaches respectively, as discussed in Section 4. The former explores the degree to which HNP and its provisions are cited by those who are involved in decision-making within Hampstead Neighbourhood Area (HNA) in order to identify the actors' perception and utilise of HNP through official documents. The latter investigates 'how' and 'why' actors use (or do not use) and (similarly or differently) interpret HNP in particular situations by tracking the process of determination of 'specific' planning applications.

1) Quantitative overview

The first part of this subsection explores the 'actual' use of HNP in implementation with quantitative data, scrutinising when HNP and its provisions have been cited by whom at key stages throughout the process of decision-making on planning applications within HNA and what policies have been used. The number of citations is related to actors' perception of HNP in the production and assessment of planning schemes. In addition, this analysis could be help to recognise the gap between responses to the interview and the actual actions of HNF and those who are involved in determination of planning proposals.

Analysis was undertaken of potentially relevant planning applications from 2018 until 2020.

In total 68 decided applications were considered in the whole of the Hampstead Neighbourhood Area (HNA) between those dates. The analysis that follows examines whether and how the NDP and its policies have been cited in relevant documents during the decision-making process including planning applications, consultation responses, officers' reports, decision-notice, minutes of the planning committee, and appeal decisions (see Chapter 4).

Citation of the Hampstead Neighbourhood Plan itself

For planning applications, 47 of total 68 researched proposals included planning statements, while 21 schemes were submitted with only an application form. When it comes to the proposals, 8 (17.02%) out of 47 planning applications cited the HNP in the HNA. It is noticeable that the level of citation depends on type of development, since most proposals are related to household extensions or minor developments rather than policies of NDPs, not only in HNP but also other cases. In contrast, only 2 out of 68 schemes have been referred to the Planning Committee to be determined, since the sites are defined as listed building. There are fewer sites for large-scale-development in HNA, as most Hampstead area is already well-developed and issues such as historic character are already well protected through existing planning policies such as Conservation Areas (Chapter 5.5.1).

The Hampstead Neighbourhood Forum (HNF) has been active in commenting on planning applications, referring the relevant policies of their NDP (NF2). The HNF has selectively commented on to 48 (70.59%) of 68 proposals and referred to HNP in 46 (95.83%) out of 48 consultation responses, whilst neighbourhood forums (NFs) do not have to comment on all proposals (NF1; NF2). This indicates that the HNF has been keen to engage in the decision-making process.

Furthermore, the HNP has been cited by ward councillors, local individuals and organisations over than 30% of 68 proposals, while other statutory consultees such as department of Camden Council and Transport for London consultees have never referred to the HNP in the researched planning applications and decisions (see Table 4 and Figure 13). For the reason why local people and groups are more active than other cases, the HNF felt that the forum has a close working relationship with them, discussing and addressing cooperatively particular

issues within HNA (NF1; NF2; NF3). One planning officer at Camden noted that most citizens may be hardly aware of the HNP, since they normally tend to comment on planning applications on the basis of their own perspective or experience rather than referring to a neighbourhood development plan (NDP) (PO7). A relatively low citation from local individuals may raise one question whether a NDP fully represents the voice and inclination of local communities.

If someone moves now in Hampstead and they know about the neighbour building and an extension and it's going to block their lights, I'm not sure how many are going to look through the planning to see if it's neighbourhood plan in the area, instead of just writing an objection about the proposal as to how is going to affect them, so there is that aspect maybe (PO7).

In addition, planning officers at Camden Council have submitted reports for 49 of total 69 planning applications and cited HNP in 47 (95.92%) out of 49 reports. According to the Annual General Meeting on 16 March 2020, the forum has reviewed 250 proposals and similarly calculated that the HNP was 'explicitly taken into account and referenced in 94% of Camden's planning decisions' (NF3). In this regard, one forum member expressed that planning officers and appeal inspectors 'give particular attention to our comments as we wrote the plan which they are basing their decision' (NF1; MHCL, 2020). The HNF also illustrated that planning officers frequently cite the policies of HNP in their decision statements and they rarely disagree with the forum's interpretation of policies of HNP (NF2). One planning officer represented that policies of the HNP are helpful to LPAs to apply and assess HNP against planning applications (PO5).

I have a feeling that gives the statistics for the number of planning consents or planning decisions made by Camden that specifically reference our neighbourhood plan. ... that's a pretty good result (NF3).

Members of the HNF and one planning officer described that the HNP is effective in decision-making, when the HNP is cited and applications are revised in line with the policies of the NDP and comments of the forum as the list below (NF1; NF2; NF3; PO5).

There is a significant percentage of planning applications that specifically mention in the officer's report or in the planning decision, specifically mention individual policies in the neighbourhood plan. That confirms to us that our neighbourhood plan has been quite effective and is influencing planning decisions. If it were not influencing planning decisions, planning decisions would not reference the neighbourhood plan (NF3).

Citation of policies of the Hampstead Neighbourhood Plan

When it comes to the citation of policies, actors have mostly have referred to the HNP itself rather than specific policies of the HNP, as can be seen in the table 5. The HNF has referred to specific policies of the HNP in most of their comments to support or object development proposals. The rate of citation of policies is similar between the HNF and other actors.

We say this should be rejected on grounds of policies of our plan (NF2).

Notably, only two Policies DH1 (Design) and DH2 (Conservation areas and listed buildings) were cited higher than 30% of documents for 68 applications but 17 out of 19 policies of the HNP were less than 5%, while all policies have been taken into account more than once. That is, a small number of policies within the HNP have been intensively used during the process of decision-making, although local people and the HNF have invested a lot of time and energy to identify and set forth all policies within HNP in order to deal with particular issues in the HNA. This implies that HNP reflects concerns and interests of local people (Section 5.5.2), but it is cautious to assume that policies of HNP are broadly influential. This also may suggest the NDPs need to comprise field-based policies rather than merely aspiration and ambition in terms of the actual use in decision-making.

Table 4 Citation of the Hampstead Neighbourhood Plan in decision-making

Documents	Total 68 decided applications in the whole neighbourhood area			
	Figure of submitted documents	% of the submission	Figure of citation	% of the citation of the NDP**
Statements of application	47	69.12%	8	17.02%
CR of HNF	48	70.59%	46	95.83%
CR of Councillors	8	11.76%	3	37.50%
CR of residents	39	57.35%	14	35.90%
CR of civic organisations	28	41.18%	9	32.14%
CR of formal consultees	17	25.00%	0	0.00%
Report of planning officer	49	72.06%	47	95.92%
Minute of Planning Committee	2	2.94%	1	50.00%
Decision Notice	66	97.06%	45	68.18%
Appeal Decision	12	17.65%	11	91.67%

* CR: Consultation response, HNF: Hampstead Neighbourhood Forum

** % of the citation = a number of citations of the neighbourhood plan / a number of the submitted documents × 100

Figure 13 Citation of the Hampstead Neighbourhood Plan in decision-making

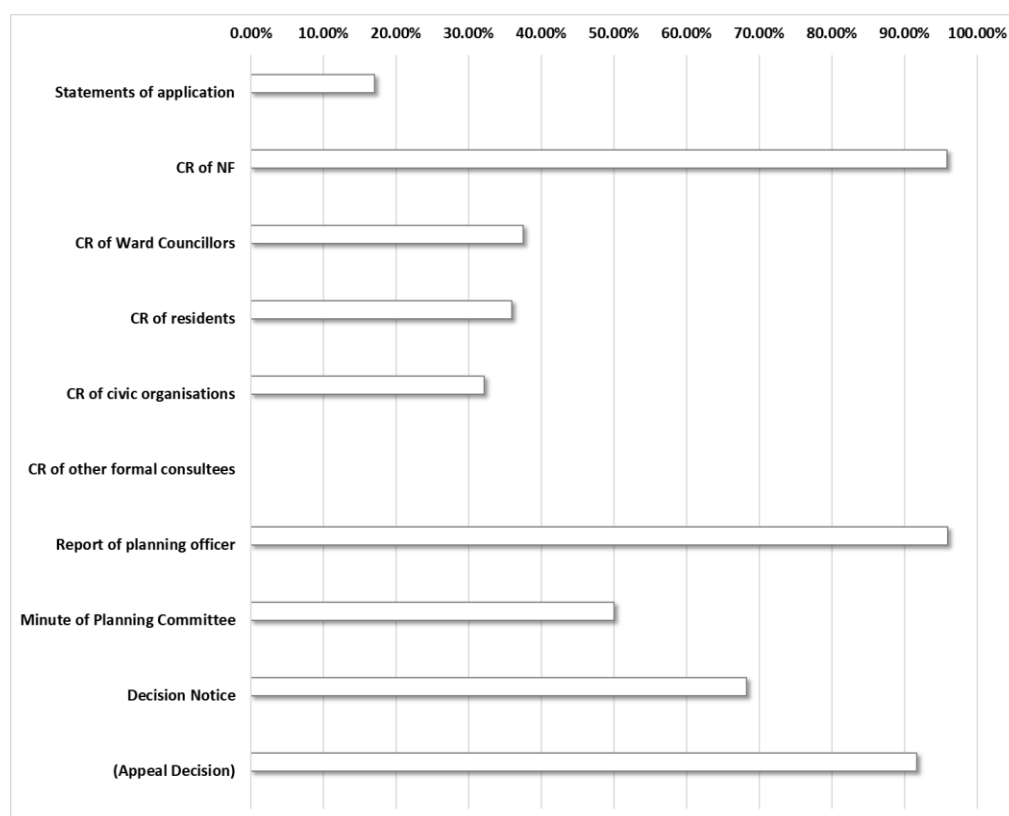
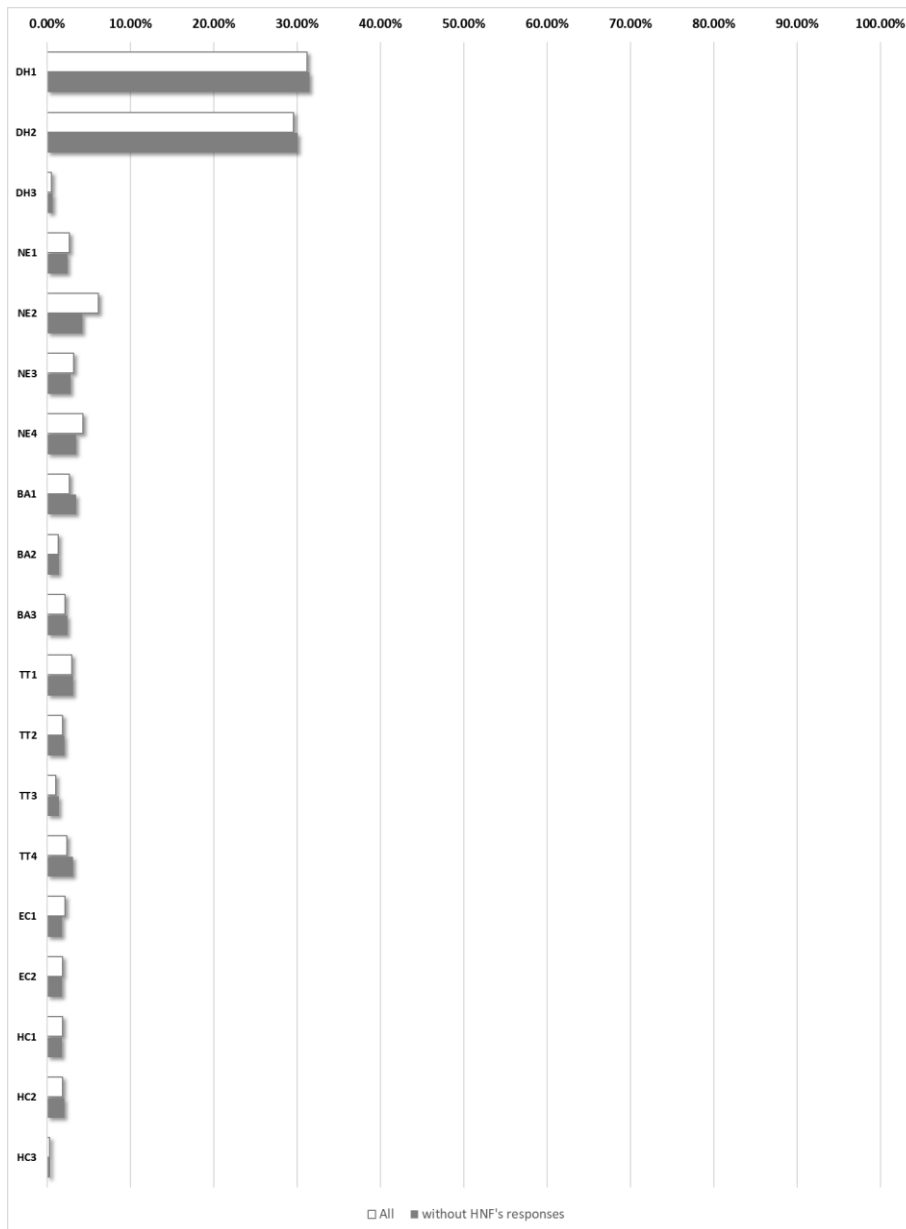


Table 5 Citation of policies of the Hampstead Neighbourhood Plan in decision-making

Policies of Kentish Town NP	Figure of citation on documents for 68 applications		Without HNF's responses	
	Count	Percentage	Count	Percentage
Policy DH1: Design	117	31.20%	90	31.47%
Policy DH2: Conservation areas and listed buildings	111	29.60%	86	30.07%
Policy DH3: The urban realm	2	0.53%	2	0.70%
Policy NE1: Local Green Spaces	10	2.67%	7	2.45%
Policy NE2: Trees	23	6.13%	12	4.20%
Policy NE3: Biodiversity Corridors	12	3.20%	8	2.80%
Policy NE4: Supporting biodiversity	16	4.27%	10	3.50%
Policy BA1: Basement Impact Assessments	10	2.67%	10	3.50%
Policy BA2: Basement Construction Plans	5	1.33%	4	1.40%
Policy BA3: Construction Management Plans	8	2.13%	7	2.45%
Policy TT1: Traffic volumes and vehicle size	11	2.93%	9	3.15%
Policy TT2: Pedestrian environments	7	1.87%	6	2.10%
Policy TT3: Public transport	4	1.07%	4	1.40%
Policy TT4: Cycle and car ownership	9	2.40%	9	3.15%
Policy EC1: Healthy retail mix	8	2.13%	5	1.75%
Policy EC2: Contributing positively to the retail environment	7	1.87%	5	1.75%
Policy HC1: Housing mix	7	1.87%	5	1.75%
Policy HC2: Community facilities	7	1.87%	6	2.10%
Policy HC3: Enhancing street life through the public realm	1	0.27%	1	0.35%
Total	375	100.00%	286	100.00%

Figure 14 Citation of policies of the Hampstead Neighbourhood Plan in decision-making



This quantitative analysis shows the HNP has been influential in decision-making but the small number of specific policies have been intensively used, given the degree of citations. However, this approach has limitation to understand the work and impact of HNP, for example, ‘why’ and ‘how’ HNP is used, whether actors similarly or differently interpret the plan and its policies in the light of original intention of local people, the extent to which HNP has an impact on decisions of planning applications, whether HNP influence the perception and attitude of actors who are involved in decision-making, and how NHF seeks to ensure that the HNP is upheld and applied to determination of planning schemes. For this, the next part explores particular decision-making cases on the basis of qualitative analysis.

2) Case study applications

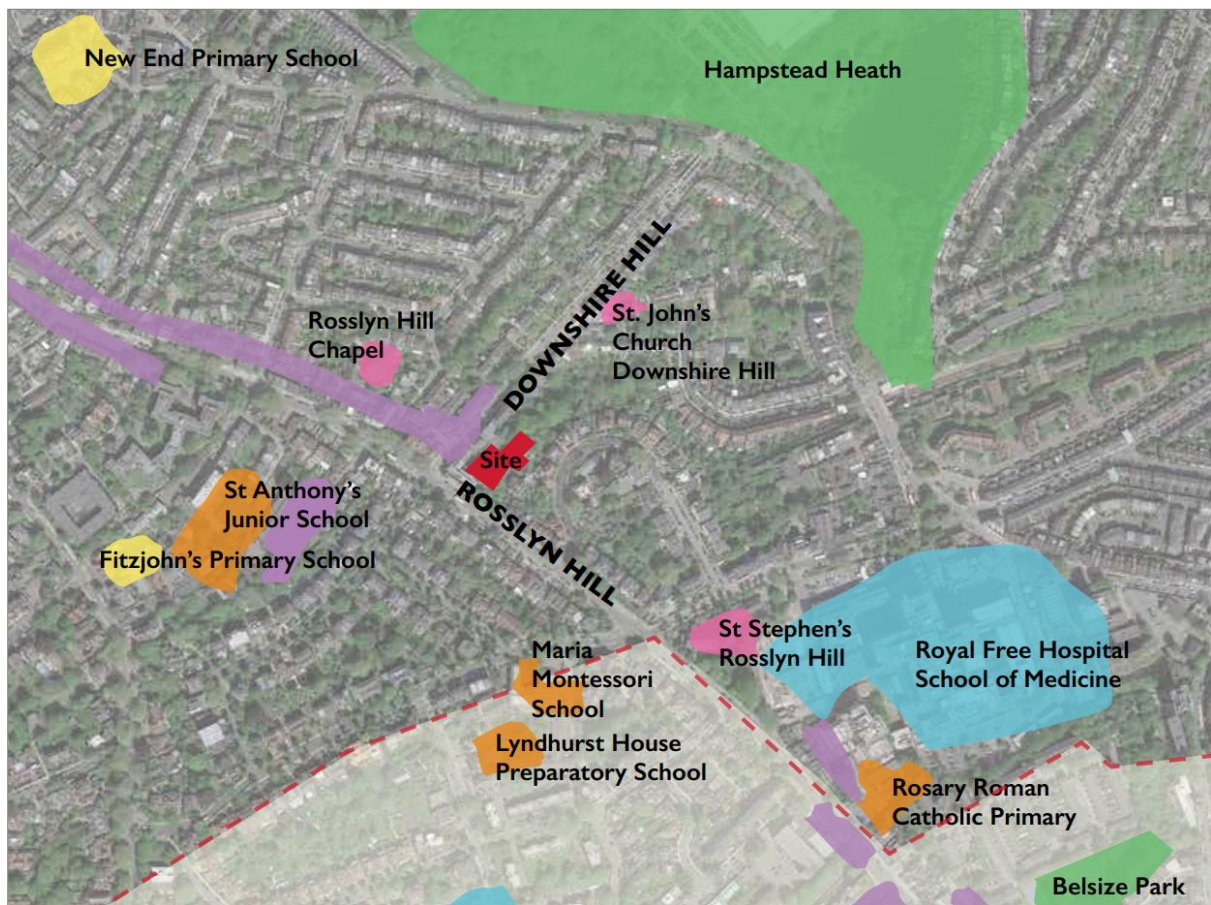
There is evidence that the Hampstead Neighbourhood Plan (HNP) has been used during the decision-making process in relation to particular types of development. This section tracks particular planning applications to understand how policies of the HNP are taken into account and how each actor at key stages in decision-making recognises and uses them similarly or differently to prepare and assess proposals. Two schemes for planning permission and listed building consent are related to the school which sought to move into the Hampstead Neighbourhood Area (HNA) from another area, whilst the Hampstead Neighbourhood Forum (HNF) has raised concerns about additional schools due to resultant air pollution and traffic congestion in HNA (HNP, 2018; HNF, 2020).

It's very important on traffic congestion. There's a link with the school run, which is another major problem for us because Hampstead contains a lot of private schools and that generates a big problem with school run traffic. ... We would want to do the school run and finding ways to bear down on the school run in our area, is again a key issue which affects local people (NF3).

The proposed site is the Former Hampstead Police Station (26 Roslyn Hill London NW3 1PD) on the main road and its surrounding area is predominantly residential. The site sits within the Hampstead Conservation Area and HNA and the HNP 'designates this part of the conservation area as Character Area 3 – 19th Century expansion' (Report of Planning Officer of Ref 2019/2375/P and 2019/2491/L). The property is the Grade II listed building which 'was designed by John Butler Dixon and opened in 1913' (Planning Statement of 2019/2375/P, p. 13; see also Report of Planning Officer of Ref 2019/2375/P and 2019/2491/L; Taylor, 2019a). This building was closed by the former London Mayor and sold to the Department for Education at a cost of £14.1million for the free school in 2014 (Taylor, 2019a; Taylor, 2019b; Tom, 2019), while the premises are currently vacant more than half decade since 2013 (Planning Statement of 2019/2375/P). Abacus Belsize Primary School as an applicant has been keen to move into this building since 2014. Abacus opened as a non-fee paying secular school (free school) in September 2013 and serves a catchment area encompassing the Belsize Ward. The school 'was set up by campaigners who said that there was a shortage of primary school places for families in the Belsize Park area who wanted an alternative to "pray or pay" – religious or private schools.' (Report of Planning Officer of Ref 2019/2375/P and 2019/2491/L; Taylor, 2019a; Taylor, 2020). Abacus has been based in temporary location at Camley Street

in King's Cross at the time of decision-making.

Figure 15 . Site map of 2019/2375/P - Abacus Belsize Primary School Design and Access Statement (2019, p. 6)



Before the HNP was produced in 2018, Abacus submitted previous applications (Refs 2016/1590/P and 2016/2042/L) with regard to a change of use and extension to the main building for a two-form-entry school (420 pupils) in 2016. The schemes were refused by the Planning Committee for a number of principal reasons, 'including conservation and design, transport, amenity, air quality and impact on trees' (Planning Statement of 2019/2375/P, p. 1; Report of Planning Officer of Ref 2019/2375/P and 2019/2491/L). One of main concerns was the heritage implications of the development 'which included the substantial demolition of the listed building, with a large extension added to the rear' (Planning Statement of 2019/2375/P, p. 16). After the adoption of the HNP, the revised proposals (Refs 2019/2375/P and 2019/2491/L) were submitted in May 2019 and 'the proposed extensions and alterations to the building' were 'much reduced', by cutting the intake to 210 pupils and setting up a 'business centre' on site (Planning Statement, 2019; Report of Planning Officer of Ref 2019/2375/P and 2019/2491/L).

While the Abacus school was rated 'outstanding' by OFSTED, popular and well-supported by parents, the variety of concerns were raised with regard to additional schools, heritage, air quality, noise, transport, daylight, and amenity by local people, organisations, the HNF, town councillors, and members of the Planning Committee (Planning Statement of 2019/2375/P, pp. 4-5; p. 65; Appeal Decisions of APP/X5210/W/20/3248002 and APP/X5210/Y/20/3248003, p. 2). The proposals were refused by councillors of the Planning Committee in a vote in December 2019 and the appeals were dismissed in December 2020, although the schemes were recommended for approval by the planning officer of Camden.

The Abacus school insisted that the scheme is unlikely to bring significantly noise, air pollution and traffic congestion, but a lot of opponents including the HNF, Hampstead Town Councillors, local groups doubted the clarification of the applicant. The objectors have raised concerns that this scheme would result in the increase of traffic congestion and the resultant air pollution, although Abacus pledged to be a car-free school with the Green Travel Plan and parents who wrote in support of the proposal expressed that 'they want to walk their children to school' (Tom, 2019). The several opponents have also been apprehensive that the site is outside the Belsize catchment area of the school. In particular, the existing schools concerned about the adverse impact on the dwindling school roll and funding and Camden's education chief Councillor Angela Mason emphasised that Camden has the lowest fertility rate in the country (Osley, 2019a).

The applicant took policies of HNP into account: DH1 (Design), DH2 (Conservation areas and listed buildings), DH3 (The urban realm), TT1 (Traffic volumes and vehicle size), TT2 (Pedestrian environments), TT3 (Public transport), and HC3 (Enhancing street life through the public realm) (Planning Statement of 2019/2375/P). However, the HNF opposed them, referring to the policies of the HNP as grounds for objection: impact on local school run; harm to heritage asset (DH1 and DH2); increase of traffic movement; Air pollution and traffic (TT1) with air pollution evidence which was surveyed by the forum in 2016; Local Amenity; Supporting biodiversity (NE4); Community Facilities (HC2) (Consultation Response of Hampstead Neighbourhood Forum (HNF) to Ref 2019/2375/P and 2019/2491/L). The HNF posed the matters resulting from extra schools referred through the HNP several times, as the forum has sought to protect the existing schools and to erode 'the increase of additional schools mainly due to traffic congestion and air pollution (HNP 2018, p. 7; p. 49; p. 60; p. 79;

NF2; see also Consultation Response of HNF to Ref 2019/2375/P and 2019/2491/L).

A free school. In other words, it's not a Camden school, but it is a state funded school. Not a private school. We have many private schools in this area. ... They wanted to take over the police station, and in fact, the government, the Department of Education, bought the building a few years ago in anticipation of it becoming a school, so it owns the building ... There's a massive outcry, we do not want them in. We, as in we, Hampstead, does not want the school to be there because it's concerned about various issues about the building itself, about traffic, about noise, all those traditional issues. We objected (NF2).

Despite a number of objections, the planning officer recommended that the planning applications be approved, considering the Policies DH1, DH2, DH3, NE2 (Trees), NE4, TT1, TT2, TT3, and HC2 of the HNP. It is worth noticing that the opponents and the planning officer reviewed the same scheme against the same policies of the HNP, but results of their assessments were different. This implies that policies of the HNP were differently interpreted on the basis of perspectives of each actor. For example, the objectors including the HNF, members of the Planning Committee and an appeal inspector raised concerns that this project would bring harm in heritage terms and consequently contrary to the Policy DH2, but the planning officer had a different view that 'The level of harm identified is not substantial. ... The proposal is considered in general accordance with' policies DH1 and DH2 of the HNP (Report of Planning Officer of Ref 2019/2375/P and 2019/2491/L, paragraph 8.27-8.28). Such discrepancies of interpretation between users imply that different messages are delivered to different audiences (Healey, 1993).

There was another controversy regarding different perceptions of the role and range of HNP and its policies between the planning officer and the Planning Committee. In the HNP, the concerns of additional schools and air pollution are linked and addressed through the traffic and transport policies rather than establishing separate and specific policies, since policies within neighbourhood development plans (NDPs) have to be related to land-use (Section 5.5.3). Despite the effort that local people made to avoid additional schools, the planning officer stated that 'the question of need for a school or the cost of the school are not planning considerations' on the report to the committee and also advised councillors at the meeting that the proposal should only be assessed 'on planning merits' (Report of Planning Officer of Ref 2019/2375/P and 2019/2491/L; Taylor, 2019b). The planning officer added that 'policies generally talked about choice and diversity of choice and encouraged school developments. Need for a school was not referenced in any specific planning policy though it was important

to note this was not a new school and need had not been a reason for refusal of the previous application' (Minute of Planning Committee to Ref 2019/2375/P, p. 5). However, the councillors of the committee disagreed with the planning official and highlighted that 'London Plan and Hampstead Neighbourhood Plan seemed to provide planning grounds to consider need' (Minute of Planning Committee to Ref 2019/2375/P, p. 5).

The councillors on the Planning Committee consequently opposed the recommendation of the planning officers and refused applications for both planning permission and listed building consent. The councillors took policies and contents of the HNP into consideration, although specific policies were not directly cited within the minute of the meetings. The members of the committee raised issues about the impact resulting from traffic congestion, noise, air pollution and harm to a historic building due to the internal work (Minute of Planning Committee to Ref 2019/2375/P). They also 'raised concerns about a possible "loss of amenity" as primary schools in the borough face a crisis of under-subscribed school places', as the Camden's education chief councillor had opposed the scheme and stated at the planning meeting: 'Camden schools have seen a 25 per cent drop in their real-terms income since 2011.' (Taylor, 2019b; Taylor, 2020). In addition, one councillor of Hampstead Town ward represented: 'Whilst Abacus is an outstanding school, this planning application would have permanently placed it at the wrong site. The traffic and air quality issues would have been detrimental to both the community and the pupils, and it is for this reason that it contradicted planning policy, including the Hampstead Neighbourhood Plan.' (Taylor, 2019b).

The councillors on the committee pointed out that the Camden Local Plan 'was clear that additional traffic should not be permitted at this site', and argued that the schemes appeared 'lacking in terms of strict controls for preventing car use and it was difficult to enforce a car-free school at this location' (Minute of Planning Committee to Ref 2019/2375/P, pp. 5-6). Furthermore, the councillors emphasised the adoption and intention of the HNP 'since the previous application was considered, which set out the need to be cautious around permitting additional schools in Hampstead because of cumulative impacts' (Minute of Planning Committee to Ref 2019/2375/P, p. 6).

The scale and intensity of use of some community facilities, such as schools, colleges and higher education facilities can lead to adverse impacts on residential amenity. This is principally related to the movement of large numbers of people at certain times of day,

impacts such as noise and air pollution and the pressure on the transport system. ... Hampstead and Belsize Park have a very high concentration of schools where significant issues exist concerning the 'school run'. We will refuse applications for new schools or the expansion of existing schools in these areas, unless it can be demonstrated the number of traffic movements will not increase. (Camden Local Plan 2017, p. 141)

The Policies TT1, TT2, and DH2 of HNP were cited as transport and historic grounds for reasons of refusal on decision notices (Decision Notice of Ref 2019/2375/P, p. 1; Decision Notice of Ref 2019/2491/L). There were differences in interpretation between the councillors of the committee and the appeal inspector in relation to extra schools, although they referred to the same policies to assess the planning application. The inspector dismissed the appeals but also differently examined the proposals against policies of the HNP. The inspector stated that the applications comply with the Policies TT1 and TT2 relating to traffic and transport section, but are contrary to the Policy DH2 which was cited as ground to assess the architectural and historic interest (Appeal Decisions of APP/X5210/W/20/3248002 and APP/X5210/Y/20/3248003). To be specific, the inspector conceded that moving the school is unlikely to lead to an increase in traffic congestion and air pollution, but illustrated that other matters including noise, harm to architectural and historic interest, and exposing children to pollution due to the location close to a main road considerably outweigh the benefits of utilising this building.

This investigation illustrates how policies HNP were used by actors at key steps of decision-making and how the policies affect the assessment of planning proposals. The HNP provided a place of debate with specific subjects of arguments to draw attention of actors, for this case, in particular, with regard to the additional school, but the impact of HNP varies with perception and interpretation of the actors within the discretionary planning system in England. Different actors at different positions referred to the HNP for different purpose. This implies that the HNP had a complex interaction with different readers and users. In this regard, the HNP was not successful in shaping how those issues were perceived, although the HNP encouraged and persuaded an applicant, consultees and decision-makers to consider locally-specific issues raised by local people through the process of decision-making. This case also identifies that HNP as a neighbourhood planning group has an ongoing role post-adoption for the effectiveness of HNP by keeping reminding why and what policies should be taken into account for the determination, and having a close relationship with those who are influential in decisions.

Consultation responses of the neighbourhood forum

This part explores a unique role of HNP and HNF as gatekeepers. In the quantitative analysis above, HNF has responded to planning schemes in order to recall the applicant and decision-makers to make sure that the HNP is taken into account, by commenting whether the proposal abides by the HNP and which policies of the HNP were closely related to the proposal. This implies that the HNP and HNF are closet but still has a significant impact on decision-making by attempting to preserve the accesses from unwanted development. The HNF states on its website that some planning applications are revised in accordance with comments of the forum, for example:

- 2021/2651/P - Forum supported revised proposals which replaced plans that the Forum had opposed but Camden had approved. The new proposals satisfy Plan policy DH1.
- 2020/5651/A and 2020/5652/A - Forum objected to proposals for illuminated signs outside two school branches as contrary to Plan policies DH1, DH2 and NE4. Objection withdrawn after application revised to eliminate illumination.
- 2020/1767/P - Forum objected to over-high railings as contrary to Plan policies DH1 and DH2. The applicant revised the application and the objection was withdrawn.

One forum member illustrated that the forum's comments on proposals are beneficial to developers, since the applicants can save substantial work and time and reduce potential conflicts if they conform to the HNF's comments and the HNP.

Sometimes the applicants will see the objections and will modify the plan, modify the application to either reduce the height of a fence, or not cut down so many trees, or reduce the size of an extension, this kind of thing. Sometimes, planning officer then will come back to us and say, 'They've changed the size of this, do you want to withdraw your objection, or do you think it's now acceptable?' Sometimes we have said, 'Yes, that's okay.' It helps them because then if there are big outstanding objections to an application, then they have to go through a much more elaborate process internally. ... If you can reach an agreement on something that avoids that, then it saves them a lot of work. That's good. It means that the plan has had an effect. It means that an applicant has changed their application because of the policies in our plan. ... I would say that the overall experience that we have had so far suggests that our plan has had an effect on planning decisions, and also, that the comments that we make about planning applications also had some effect. It would vary from application to application (NF2).

5.5.6 Role of the neighbourhood forum post-approval

After the adoption of the Hampstead Neighbourhood Plan (HNP) in 2018, the Hampstead

Neighbourhood Forum (HNF) decided not to disband and was redesignated for a further period of 5 years by Camden Council on 25 October 2019 (NF1; NF2; MHCL, 2020; HNF, 2020). The forum continuously holds regular meetings and shares minutes on their own website; provides suggestions on relevant issues and comments on planning applications within Hampstead Neighbourhood Area (HNA); monitors relevant planning policies and preparing the revision of the HNP; and has a close relationship with the LPA and local communities and groups. One forum member expressed that the forum volunteered and committed a lot time and effort to produce the NDP between 2014 and 2018 and their commitment 'was rewarded because the NDP actually performed the function that it was designed to perform' (NF3).

However, the HNF felt what they 'did must be in keeping with the plan and the vision that was expressed in the plan', emphasising that they have no official status after the adoption of NDPs (NF3; NF2; PO3). One responder pointed out that the forum constantly needs to make certain that the HNP is upheld and used in decision-making in line with the initial intention and aspiration of the local people, since 'the planning officers do change. That's a turnover there' (NF2). This implies that the work of NDPs relies on not only NDPs themselves but also the attitudes and stances of LPAs, given the discretionary planning system in England. In other words, the NDPs per se merely conveys aspirations and intentions of local communities to reader and users and then actors decide how or whether to use the plans. Neighbourhood planning groups (NPGs), in this regard, need continuously to work for the performance of NDPs by persuading those who are involved in the implementation of NDPs, although their activities are not mandated.

Technically, your plan has statutory force once it's gone past referendum and been adopted by the council. I think what we felt was that you want to be sure that you still had a mandate. In other words, that you're not just pursuing things just because you feel like it. ... I think that there are legitimate roles that we can play as a forum that are within the mandate that we originally had, and are in keeping with the vision and the policies of our plan. ... I feel that this has been useful, and that we have to continue to do it, by the way, because it requires constant attention, because the planning officers do change. That's a turnover there. You need to make sure that you're on the same wavelength, even if you do not always disagree, if you do not always agree. I think it's been useful (NF2).

The HNF therefore created the mission statement as a guidance of their work regarding the NDP and covers their activities for the next five years and is divided into three parts for their activities (NF3): 'ensuring the performance of the Plan, keeping the Plan under review for future updates and being a forum on issues important to residents, in keeping with the Plan's

vision, aims and policies'. In conformity with the mission statement, the forum seeks 'to facilitate discussion' within HNA 'on topics of importance to residents' (HNF, 2020).

Continuous roles: monitoring, consultation, and revision

Monitoring planning activities, responding consultations, and revising HNP are main roles of HNF post-adoption which are set out on the based the mission statement. The forum as a statutory consultee continuously is keen to be engaged in decision-making by commenting on planning applications. The forum represents its views and opinions for and on behalf of local people, as planning officers have to consult the NF about planning proposals within the neighbourhood area (NA) (NF1; NF2). It is worth noting that a NF is a statutory consultee regardless of having a NDP. Statutory consultees are able to indirectly influence determination of development for planning permission by reminding decision-makers to take the NDPs fully into account, as LPAs have to take comments of consultees into account. Despite citizen-planners, the status of NFs is not automatically maintained unlike Parish or town councils (as discussed in detail in Chapters 2 and 3), and the NF 'selectively' needs to apply for re-designation to LPAs every five years. The HNF seeks to make certain that planning officers and applicants perceive and use policies of the HNP in decision-making, and the forum therefore comments on planning applications to persuade and reminder key actors to know which policies of the NDP are related, why the policies should be considered, and why the NF support or object planning applications (NF2; NF3; PO5; MHCL, 2020). The HNF thought that the comments are in turn 'mutually' helpful and useful to planning officers in their arguments to assess planning proposals against NDPs (NF2; NF3). For this, the forum has been cautious to comment on planning schemes in the light of relevant policies of the NDP and the local plan on their response rather than using emotional words (NF2).

The council is required to consult us. They do not need to take our responses into consideration. They do not have to listen to what we say, but they are required to consult with us. When an application comes in, the Planning Officer sends us a notice that there has been a planning application received in our plan area. This is the same as what Camden does with the consultative. ... We tell them honestly what we think about applications. It's the planning officer's job to go through all of the comments that he or she receives and to make a judgment based on that. We try to present the very best arguments. Our comments are not based on feelings. They're based on judgments about whether or not we think the proposal supports the policies in the neighbourhood plan and the Camden Local Plan. (NF1).

We thought that the forum had several useful roles after the plan was adopted. One is to make sure that the plan actually has some effect, that Camden does pay attention to it when they are considering planning applications, and that we can offer, sometimes, some wisdom or some comments on planning applications that would just alert them to what our plan says about something. ... we do not have to because the plan exists, and they are, by law, obliged to pay attention to it. ... We tried to cite our own plan. We say this should be rejected on grounds of policies of our plan (NF2).

We felt that in a number of cases, they actually appreciated us commenting, because, after all, they are responsible for executing the policies in their plan, the Camden plan. ... We also had a plan that was part of the statutory body of plans, and we objected to something, that they appreciated. It gave them support in their arguments (NF2).

We have been involved in various pieces of work to help ensure the plan is used properly by Camden Council and supports their work on assessing planning applications. ... We wanted to make certain that Camden planners and developers understand the plan, and use it. We want to confirm that when planning applications come through, that we keep an eye on them to make certain that they're in alignment with the policies in the neighbourhood plan. That bit is all about performance of the plan (NF3)

The second area is one of persuasion and persuasion of Camden's officers, so our local council's officers. We have arranged a number of meetings with our local planning officers to say, 'Are you happy with the neighbourhood plan? Are there any areas you don't understand? Are there any areas that you would like us to develop in future? How are you proposing to use it?' ... The third area is persuasion of our local councillors, so our ward councillors, the political people, to make certain that they're aware of the plan, its key policies, how it helps, and how it aligns with what people have been telling them directly, and how the plan can help by being used by the planning officers. Again, we do that by ensuring that our local councillors are members of the neighbourhood forum committee, they're ex officio members, and ensuring that we maintain good contact with them regularly about planning matters and issues that come up in our area. ... We try ... reminding them what we're there for and reminding them how important the neighbourhood plan is (NF3).

We do get quite a lot of references to the neighbourhood plan. I feel like for areas like Hampstead, the neighbourhood forum, obviously, the issues quote the neighbourhood plan, but I feel they expect us to know it anyway and their objection just comes based on that. Anyway, they don't necessarily maybe feel the need to quote it as such to clarify why they have this opinion because they expect us to know that that's where it comes from the neighbourhood forum which is the mouth of the neighbourhood plan (PO7).

The HNF set up a 'Planning Watch' page on their website to track the progress of decision-making and to share the relevant information with local people in order to 'to show them how the plan is working for them' (NF1; NF3; MHCL, 2020). The forum also set up hyperlinks their comments and marks 'Yes (green) or No (red)' to show whether the HNP is taken into account during the decision-making process or not. As of February 2021, 105 planning activities have been listed on Planning Watch with Yes 57 and No 8. This implies that the HNP has considered in 87.69% of planning decisions and one forum member described that this figure shows the local planning authority (LPA) has mostly agreed with the evaluation of the

HNF (NF1). In this regard, the HNF felt that HNP is influential, as the LPA has had rarely different opinions or interpretation from the forum (NF2; NF3). As one forum member noted that 'there are going to be differences of interpretation.', since Camden Council considers NDPs or planning applications at the whole of borough scale rather than at the community level (NF2). This seems imply that NPGs need to work post-adoption to keep reminding original meaning and intentions of local plans which are articulated through policies of NDPs.

We have kept track of the planning decisions. ... Probably 90% of the time Camden agrees with our judgment. ... The Planning Watch. ... We decided right from the very beginning that the only way would be to track our decisions and that's what we have done (NF1).

Now, it does not assume that we will always agree, we will not always agree. Of course, they have to do their job, they are professionals. They get planning applications, and they have responsibility as public officials to decide on planning applications as best they can. ... We felt that they did have a good understanding ... There are going to be differences of opinion, and, to some extent these issues are subjective. We may say that extension is too big, and they may say, no, it's not really. They have to take other things into account, they have to take into account other decisions that they've made (NF2).

A significant number of planning decisions made by Camden's planning officers specifically mentioned policies in our neighbourhood plan. We believe that piece of work has been effective (NF3).

Moreover, the HNF 'selectively' prepares to revise HNP before the finishing the plan period in order to remain the status of the plan and improve its effectiveness (NF2). At the time of interview, the HNP was preparing the modification for the existing HNP. The forum insisted that their experience and skills relating to the production of the plan would be valuable and helpful to enhance the plan, since they recognised what gaps the existing NDP has; knew 'where the plan was deficient'; and, consequently, considered how the new NDP can be more specific and effective (NF1; NF2; NF3). In this sense, one forum member pointed out that 'the forum continues to exist' (NF2).

Now, we don't necessarily think that all of our policies are as effective as they could be. Now with some looking back. We're keeping also track of policies that in the future we might want to amend to make them more effective (NF1).

Not every plan is perfect. We have not thought of everything. That also leads us to think that at some point, you would want to revise the plan. Therefore, it's important that the forum continues to exist so that with the experience of having produced the first plan, and then seeing what effect that has, at some point, then you would want to revise the plan, produce another plan that kept you up to date with what was actually happening in the area. ... you already have done quite a lot of the work because you have a plan, and then you have monitored that plan, and you can see where the plan was deficient. Definitely, there are areas which we wish we had been more specific about already, and it's only it has not been in effect

that long, but we can see that we should have been more specific about some things (NF2).

We wanted to look at perhaps areas that had not been fully addressed in our existing neighbourhood plan and keep them under review so that we are ready to start the work when the time comes, to develop the next neighbourhood plan, and we understand the gaps and the needs that still exist that need to be improved on (NF3)

Relationship and entanglements

After the adoption of the HNP, the HNF has occasionally meetings and keeps a professional relationship with the LPA in order to discuss about planning issues and share the local information through various ways including email, telephone calls or face-to-face meetings (NF1; NF2; PO3). The HNF, in particular, walked around HNA with planning officers in order to debate particular issues precisely and to familiarise planning officers with the character of the area and the implications of policies of HNP (NF1; NF2; NF3; PO7; MHCL, 2020). One member of the HNF illustrated that it was 'mutually' useful to the forum and the LPA (NF2).

We organised a walkabout with our local planners around our area, and we talked to them about key policies in our neighbourhood plan and their application to different issues that may come up in planning decisions. We try to educate them about our plan and seek their feedback and encourage them to take ownership of our neighbourhood plan and almost regarded as being their plan as well (NF3).

We did meet once with the Hampstead Neighbourhood Forum and we had a walkaround Hampstead for them to show us why important for them, like certain buildings, certain green spaces, certain areas that have a specific character and why that is important for them (PO7).

HNF acknowledges that the formation of relationship with the LPA is crucial to the effectiveness of the HNP on implementation. The forum described the planning officers are the experienced experts, have enforcement powers and 'accountable for the decisions that they make on planning applications'; and the elected councillors are also key actors on planning activities, since they 'are accountable to taxpayers for the content of the Local Plan and for all Camden's planning decisions' (HNF, 2020). The additional reason is that applicants seem have no interest in the relationship with local people and NFs (NF3; PO5). The developers tend to have a close connection with the LPA rather than HNF, since they recognise that the LPA has responsibility to attach weight to NDPs in the assessment of planning applications at the end (NF3; PO4). One planning officer described that it is relatively 'easy' to have a relationship with applicants, since the developers normally 'chase us and ask

for' feedback of the officers (PO5).

In this regard, one forum member criticised two key aspects of the planning system that there is no incentive for developers to engage with the forum and local people and 'the whole of the development process is all about ticking boxes' for planning consent (NF3). This implies that there is restrictive place for the NPG to make sure that the NDP is taken into account in determination of planning applications except commenting on them. Hence, the relationship with the LPA is consequently significant to the forum. In this sense, one forum member described that this is the 'soft power' of the NF to influence the perception of actors and in turn the determination of planning applications (NF3).

A lot of the applications, the design access statements, and the planning statements were not referred to the neighbourhood plan because they just have not really looked into it, and it's just because they know at the end of the day, it's our responsibility as officers to address that neighbourhood plan (PO4).

For developer or applicants, they obviously just want feedback most of the time. They would like to know what we think of what the council ... and also want to know if there's any objections to them. Having a relationship with them is quite easy because they're the applicants so they always chase us and ask for stuff (PO5).

Quite often, the planning officers will suggest developers contact us and occasionally we do get contact. Generally, developers are less interested in talking to us. ... Their interest is not really Hampstead Neighbourhood Forum, their interest is Camden's planners. So long as they can convince Camden's planners of something, they do not need to worry about the local community. We've received less interest from developers because the whole system really does not incentivise them to consult with local communities (NF3).

That's why it's really important for us to hold these meetings with the planning officers and with their managers. ... We've consulted them, we've asked them how the plan is working for them, we've wanted to make certain that they take ownership of the plan and feel that the plan is their plan as well. ... Obviously, we are in regular communication with them about individual planning applications. We tried to use that kind of soft power to try and get their buy-in (NF3).

This is particularly with the planning side. ... It's specifically on planning. Because we do have other contacts with them, inevitably, but specifically on planning. We wanted to make sure that after the plan was made, that they were aware of our policies, that they knew about our area. Several meetings were arranged where members of the committee had a group meeting with their area's planning officials (NF2).

The HNF has also a working relationship with local groups including the conservation societies, local resident associations, and local business groups (NF1). The forum discussed their comments with those organisations or ask for their view regarding planning applications within the HNA. Such 'good' relationship is beneficial to the forum since local groups have

specific expertise that the forum does not necessarily have and provide various perspectives on particular proposals or issues (NF1). HNF and local groups have often mentioned comments of each other on consultation responses on planning proposals in several cases, since a LPA has to consider comments of consultees.

We work very closely and have a very good relationship. We will often email our comments to the [Name of a local group], or ask them what they think about a particular application, or have they seen this particular application? Yes, we have a very good working relationship with other bodies and value their opinion. ... They have expertise that we do not necessarily have. They have many architects who help with their drafting of decisions. It's always good to get a different perspective. Local people contact us as well (NF1).

In the discretionary planning system in English, attitudes and orientations of actors are considerable, in particular, given the uncertainty of the work of HNP themselves; and this implicitly in turn requires the activities of HNF post-adoption for the implementation of their plan.

In the representativeness terms, the HNF conceded that the effectiveness of HNP can be limited, since the plan is produced by the forum who does not fully represent the whole of the Hampstead Neighbourhood Area (HNA) (NF2; PO3; PO7). The forum and planning officers described that NFs are volunteers and consequently do not have relevant accountability, although they invest a lot of time and energy to produce their own NDP (NF2; PO3; PO7). When it comes to the status and legitimacy of NFs, several planning officers and councillors of the Planning Committee pointed out that a NF is 'not elected through a democratic process of that nature' and therefore they 'do not formally represent' all local people (PC1; PO1; PC2; PO3), compared to the democratic accountability of decisions made by LPAs, especially under delegated powers. In this context, one member of the HNF described that the Localism Act empowers local people 'a bigger voice in shaping their neighbourhoods', but it should not be the dominating voice (NF2), while another member had a different view that the large voice should be local community's voice (NF3).

What we've done is just as local residents, what the Localism Act did was to give local residents a bigger voice in shaping their neighbourhoods, and I think that's useful. It's definitely useful, but of course, it can't be the dominating voice, it's a voice. The laws of the country, the Camden Local Plan, which after all, is developed over years of experience, and the people who developed the Camden Local Plan, they are professionals, it's their job to do it. I'm not paid anything, we're all just volunteers. We're just volunteering our time, and we're not experts, I'm definitely not an expert. I think our voice as residents should have some effect, so this mechanism of neighbourhood planning has given us a chance to have more say, more

democratic say, if you like, in what goes on around us, but I wouldn't want to push it too far (NF2).

It is democratic, if you like, because it gives us a greater voice. ... volunteering non-expert voice, but we don't have accountability, which I'm very happy about. We don't have to answer to taxpayers, we don't spend any money. We didn't even have a bank account. Now we do have one for the small expenses that we have, but in the whole production of the neighbourhood plan, we never had a bank account, so no money involved, but no accountability. Well, with small grants, like there's a body called Locality which gives grants to neighbourhood forums, so we're not accountable to taxpayers or to voters. ... We have annual general meetings where the committee is elected, all those formal processes, and we have several laws, but it's not the same as being a public body with accountability for public money like Camden is or the government is (NF2).

Ways in which our neighbourhood plan could be made more effective. I think, the first thing, the balance of empowerment between the neighbourhood plan and the higher-level plans is it's tilted very heavily in favour of the higher-level plans. I think there needs to be almost a new deal, a new understanding as to the force and influence that local people could have. I would say that the largest voice, rather than the smallest voice in planning decisions should be the voice of the local community (NF3).

5.6 Summary

Contexts of two neighbourhood development plans

Kentish Town and Hampstead are both close to the London Central zone and the Heath and in the same London borough of Camden, but have different characteristics of areas including population and economic status. Kentish Town comprises both developed and developable areas with large industrial areas, while most Hampstead area are already well-developed. Kentish Town Neighbourhood Plan (KTNP) and Hampstead Neighbourhood Plan (HNP) were produced to protect and improve the characteristics of the area but their approaches are different to address particular concerns and priorities of each area, as one planning officer described that in Camden 'the neighbourhood plans each have their own set of policies which is specific to that area. There are differences because they are picking up on concerns which are specific to them' (PO1).

The KTNP was produced to revitalise the town centre and to deliver a variety of developments for the growth of their area due to the loss of retail and decline of the local economy, by spatial policies with site allocation to promote various developments and retail policies to

protect and enhance the environment for commercial business particularly the town centre. However, the HNP was created to mitigate harmful effects of traffic congestion, additional school run and air pollution and to protect distinctive character of buildings and open spaces from pressure of developments which tend to expand available space and consequently to bring tensions, through relevant policies to deal with those topics by providing extra requirements.

The role of neighbourhood forums post-adoption

As there is no already established parish or town councils, Kentish Town Neighbourhood Forum (KTNF) and its Neighbourhood Area (KTNA) were officially designated in 2013, and Hampstead Neighbourhood Forum (KTNF) and its Neighbourhood Area (KTNA) were designated in 2014. Neighbourhood planning of both areas was initially undertaken by a local group of each area who already have a considerable local voice (PC1; PC2; PO2). The forums were redesignated to engage continuously in their NDP on implementation.

After the adoption of each NDP, the KTNF and HNF similarly work to monitor planning activities, comment on proposals, and revise their plan. The forums as a statutory consultee are continuously keen to be involved in decision-making, since they are required to respond to planning applications by the LPA. It is noticeable that although they have similar roles to make sure that their plans are taken into account and their plans have been used during the decision-making process, some aspects on implementation are different such as activities of the NF and policies.

Applicants have similarly cited the KTNP on approximately 16% of proposals and the HNP on 17% of those. The figures significantly depend on the type of developments and policy of the site allocation. Kentish Town and Hampstead comprise mostly residential areas and the vast majority of applications have been related to householder or minor developments. However, more than 50% of schemes referred to the KTNP within the allocated sites, since the KTNP allocated specific sites and guidance for spatial policies unlike the HNP. It is noticeable that the formal consultees such as Transport for London, Thames Water, and Camden's design team have never referred to both NDPs relating to the researched proposals, unlike other consultees including ward councillors, and local individuals and organisations.

The KTNF has commented on approximately 47.37 % of applications, while the HNF has responded to around 95.83% of proposals. This indicates that the HNF has been more active than the KTNF with regard to planning activities. In addition, more local residents and organisations in the HNA have taken their plan into account over 35% of their comments on schemes, while the local individuals and groups cited the KTNP with around 1.7% and 11.1% respectively. The HNF described that they have has a close relationship with local groups and people and discuss various issues including proposals within the neighbourhood area. The relationship with other actors is a key factor relating to the impact of the NDP, as the local groups are generally regarded as a statutory consultee. The statutory consultees are generally given more weight in decision-making than ordinary people, since local groups including NFs have relatively more knowledge of planning system and use policies of development plan such as the local plan and the NDP, as one planning officer noted (PO5).

Interaction with the local plan

The KTNP and HNP were established in line with the local plan, but selectively focused on the particular policies to cope with the concerns, priorities and preferences of each area under locally-specific circumstances. For example, the KTNP set forth the step-free access of stations and more restrictive requirements for retails than the Local Framework 2010, whilst the HNP added the extra requirements for the basement construction or designated conservation areas in line with the local plan 2017.

Despite overlapping period of the preparation of the local plan 2017, the KTNP 2016 and the HNP 2018, most planning officers did not regard the time-gap as a significant issue even though the latest plan has precedence in decision-making, since the officers and the NFs recognised and engaged in the production of the local plan and each NDP. Therefore, the KTNF and the HNF already recognised the emergence of the new local plan during the preparation of the NDP. The planning officers added that there 'would be very few remaining issues' which may cause confusion or controversy in decision-making, due to consultations and examination phases during neighbourhood planning (PO3).

The KTNP has affected the subsequent local plan. Camden Council has reflected the policies of the KTNP relating to the development of industrial areas into the local plan and further established Kentish Town Planning Framework as a supplementary planning document of

Camden 'which actually looks into much detail of' consideration and intention of the KTNP (PO7). Unlike the KTNP 2016, at the time of this research, it was impossible to examine how the HNP 2018 has been directly influential in the Local Plan 2017. However, it is noticeable that NDPs including the KTNP and HNP in Camden override the local plan in particular aspects. For example, Camden Planning Guidance 2021 states that the requirements of NDPs can override those in the local plan in terms of the level of retail use, notwithstanding the latest plan generally takes precedence. It assumes that Camden Council has positive attitudes towards NDPs. However, some policies such as design code became invalid as a consequence of changing policies of the central government.

Work of neighbourhood development plans in decision-making

KTNP and the HNP have been influential in decision-making, since NDPs and their policies have been cited by actors and sometimes applications were revised in line with policies of the NDP or NFs' comments on the proposal, as members of NFs recounted. KTNP and HNP have been unevenly used in the process of decision-making. Only one policy of design within the KTNP has been referred more than 50%, while the rest of policies have used less than around 5%. Similar to the KTNP, only two policies of the HNP regarding design and conservation areas have been taken into account more than 30%, whilst other policies have cited less than approximately 5%. It is worth noticing that 3 (20%) of 15 policies (with the exception of particular spatial policies) of the KTNP have never been cited in all of the researched documents, although all policies of the HNP have been used more than once. It implies that the HNP contains more tailored policies which reflect and address locally-specific issues and consequently has been more widely used throughout the decision-making process, while the KTNP was more influential within the allocated sites.

In the discretionary planning system in England, however, the work and effectiveness of the plans significantly depend on attitudes and willingness of actors such as applicants and decision-makers, according to the qualitative and quantitative analysis. The LPA have to take NDPs into consideration, while applicants and consultees do not have to cite the NDP on their proposals or comments. Furthermore, each actor has different perception and interpretation of policies of the NDP and consequently those discrepancies result in controversies throughout the process of decision-making. This implies that the NDPs are influential by

providing the agenda of arguments.

Several planning officers and Councillors of the Planning Committee at Camden positively expressed that the KTNP and the HNP have less duplication of policies of existing development plan and add extra values to the local plan at the community level, although some conflicting words within both NDPs are still open to interpretation in decision-making. However, officers expressed that a NF is one of the community groups and that a NDP is part of development plan with the same weight with local plan. The planning officers described that the local plan deals with all issues within the borough irrespective of the NDP and that the NF does not represent fully local people even within the whole of neighbourhood area. This implies that such perspectives raise questions about the necessity of the NDP and the legitimacy of the NF, although the NDP deals with locally-specific issues raised by local people at the community level.

I think, with the Camden local plan that we have, that in itself is set at a level of detail. That means that whether or not the neighbourhood plan comes forward, there is a sufficient suite of planning policies that cover all the relevant issues and are robust and able to deal with the range of different developments that come forward wherever you are in Camden. (PO3)

Despite such perception of the NDP, planning officers felt that NDP is helpful, since it strengthens the 'negotiation process' and helps them make 'better arguments' in relation to certain aspects (PO7). In particular, the officers pointed out that the NDP can override the local plan regardless of the adopted date, if the NDP has robust evidence or strong reasons and has to be in accordance with the local plan. In terms of the level of retail use, for example, NDPs have precedence over the local plan in Camden.

Councillors of the Planning Committee at Camden normally consider the NDPs to assess planning applications and ask the planning officers whether the application complies with a NDP. However, in some cases, the LPA tends to attach more weight to the local plan than the NDP, when there is a conflict between the priorities of the borough and the requirements of the NDP. For example, Camden Council desires to provide sufficient affordable housing through the developments in the industrial areas but their heights would be restricted by the view corridor which designated by the KTNP (PC2; PO7).

Furthermore, most planning officers and councillors at Camden raised apprehension about the representativeness of the NF which was newly designated unlike the already established

parish and town council, since the forum as volunteer is not elected and have no accountability. The officers and councillors also described that the forum is part of community and does not fully represent all communities within the neighbourhood area, pointing out the low turnout at referendum. Consequently, the NDP can be unconsciously limited, since the plan is produced by such NF. In this regard, some members of the NF and the decision-makers were cautious that the NDP has more influential in decision-making. One planning officer clearly elucidated how the NDP is perceived and used in decision-making:

It's difficult to say this particular decision is wholly as a result of the neighbourhood plan because it's one part of what the planning officer will look at in making planning decisions. He or she will also look at the Camden local plan, he or she will also look at the London plan. It's definitely part of the overall mix of what needs to be considered, but whether it's determinative in its own right, whether it's the sole basis on which a particular decision is taken, I think that's probably unlikely in most cases because the neighbourhood plans will generally build on what's already there, rather than doing something which is wholly different if that answers the question. (PO3).

Overall, this chapter has investigated the impact of NDPs produced by NFs on decision-making. The contents and policies of NDPs vary with localities including the concerns and interests of local communities at Kentish Town and Hampstead. Each plan has different interaction with the Camden local plan depending on timing and contents, while KTNF and HNF are involved in the production of subsequent local plan. The plans have an impact on determination of planning applications since their policies have been cited by actors at the key stages. Their effectiveness significantly depends on the perception and inclination of actors given the planning system in England. KTNF and HNF maintains their status and continuously work for the performance of their NDPs in various ways, but their activities vary with the aspiration of communities and orientation of the plans. The forums are involved in the implementation of the plans, as can be seen throughout the analysis of KTNP and HNP. Thus, the findings of these cases indicate that the NDPs of NFs have interactive relationship with external environment including the local plan, substantial developments, those who use the plans and those who produce the plans, conveying the priorities and voices of local people to the planning system. The following chapter investigates NDPs which were prepared by town councils who are already established, comparing with NFs who are newly designated only for neighbourhood planning.

6 Neighbourhood Plans of Milton Keynes

6.1 Introduction

The previous chapter (Chapter 5) explored neighbourhood development plans (NDPs) which were produced by neighbourhood forums. The forum is purposely designated in areas where neither of these town or parish councils exist. On the contrary, this chapter examines Olney Town (ONP) and Newport Pagnell (NPNP) Neighbourhood Development Plans in Milton Keynes which were mainly led by Olney Town Council (OTC) and Newport Pagnell Town Council (NPTC) respectively in rural/ edge-urban locations. Town and parish councils have proven more likely to engage in neighbourhood plan, often through establishing stand-alone steering groups (NPSG).

This chapter firstly outlines the planning environment at the local authority level. This enables us to understand the status of NDPs within their broader external context which (positively or negatively) affects the role of NDPs. Then, the chapter critically scrutinises the performance and effectiveness of the NDPs from various perspectives, exploring: local contexts, the aspirations and challenges of the local communities during the preparation of the plans, key planning policies, the interaction of the NDPs with the local plan, the extent to which the NDPs have been used during the process of decision-making and in the production/ revision of the local plan, the perception and attitudes of actors towards the NDPs, and the status and roles of NPSGs before and after the adoption of the plans. In particular, the chapter tracks the process of decision-making on particular planning applications and traces how the NDP is used by key actors at key stages.

6.2 Context of Milton Keynes

Milton Keynes (MK) as a unitary authority is the largest settlement in Buckinghamshire, England. MK was designated as a new town in 1967, with approval for a new community of

250,000 people, in order to relieve housing shortages in overcrowded London (Cawley, 2017). It is regarded as one of the largest and fastest growing new towns in economic terms in the United Kingdom (PO9; Mark Clapson 2007). One of the key elements in this 'success' is its central location, approximately 70 kilometres north of London and equidistant from London, Birmingham, Leicester, Oxford and Cambridge (PO9).

Figure 16 Map of Milton Keynes



(Wikimedia Commons, screenshot, 20 April 2023)

In 2022, Milton Keynes Council (MKC) won 'city status' at the fourth attempt (Murrer, 2022; Norford, 2022), having previously been classed as a town and following three previous unsuccessful applications in 2000, 2002, and 2012 (TC2; TC3; TC3). The MKC was keen to become a city as a symbol of its growth and status. Its population is approximately a quarter of a million people, increasing from 52,931 in 1961, to 179,252 in 1991, to 207,063 in 2001 to 269,457 in 2019. In January 2004, the Deputy Prime Minister announced the Government's plan to double the population of Milton Keynes by 2050. MKC accordingly set out plans to double its population through urban extensions. This led the council to designate land for housing developments that exceeded their five-year housing target figure of 1,767 (PO9):

When we adopted our local plan in March 2019, we substantially increased the supply of land available for housing within the borough. As a result of that, our housing act completions have actually gone up. We're exceeding our housing need figure of 1,767 for three years in a row now. We've built more than 1,767 in the borough. We're quickly meeting our housing needs requirements (PO9).

The local plan is looking for dramatic expansion, and certainly, Milton Keynes' local plan will do. I think the intention is to almost double it in size again by 2050 (TC2).

The borough of MK comprises a fully parished area, consisting of the city of MK and a rural area outside the city including various smaller settlements and villages. The spatial context of MK seems suitable for development, since there are no Greenbelt, or other protective designations though there is a lot of high-quality agricultural land. As one planning officer at MKC highlighted (PO9), there are less constraints for development than other areas, although MKC does define 'Open Countryside' as all land outside the development boundaries on the Policies Map in order to control development (Plan:MK, 2019 p. 38; PO9). Therefore, the officer recounted that 'the focus for new housing development in Milton Keynes is the city, within and around the city' (PO9).

Figure 17 Map of Milton Keynes: Newport Pagnell and Olney



(Milton Keynes Core Strategy, 2013, p. 39)

As for housing development, the MKC Core Strategy 2013 earmarked 1760 new dwellings annually from 2010 until 2026 and identified ‘a shortfall of sites to house 613 dwellings’ for its rural housing target (MKC’s Core Strategy, 2013, p. 52; p. 66; Newport Pagnell Neighbourhood Plan, 2016, p. 5; p. 22; p. 30). The MKC set a three-tier settlement hierarchy, including Milton Keynes City, Key Settlements, and Villages and rural settlements through Policy CS1 of its 2013 Core Strategy and Policy DS1 of Plan:MK 2019 (Milton Keynes Council (MKC)'s Core Strategy, 2013; Plan:MK, 2019). Three Key Settlements including Newport Pagnell, Olney and Woburn Sands are identified for most new development within the rural area of the Borough of Milton Keynes (Table 6), since they are considered as ‘the most sustainable rural settlements, taking into account the population, constraints, transport links and the capacity of services in these towns’ (MKC's Core Strategy, 2013, p. 22; p. 52; p. 66; Plan:MK, 2019, p. 18). This housing allocation has put pressure on town and parish councils to build more extra housing in their settlements and villages (TC2).

There are three key settlements in the rural area of which Newport Pagnell is the largest with a population of over 15,250 against Olney with a population of around 6,500 and Woburn Sands with a population of around 3,350. Newport Pagnell is by far the largest and closest of these settlements to Milton Keynes. (NPNP, 2016, pp. 30-31).

Table 6. Settlement Hierarchy of Milton Keynes

1. Milton Keynes City			
Uncompleted City estates, Expansion Areas and Strategic Land Allocations	Central Milton Keynes (including Campbell Park residential area)	New Strategic Growth Areas: South-East Milton Keynes Eaton Leys Land East of the M1	Selective infill, brownfield, regeneration and redevelopment opportunities.
2. Key Settlements			
Newport Pagnell		Olney	Olney
3. Villages and rural settlements			
In compliance with made neighbourhood plans			Within defined settlement boundaries

(Plan:MK, 2019, p. 18)

MKC regards neighbourhood development plans (NDPs) as a useful tool to achieve the goals of the local authority. To be specific, one planning officer illustrated that NDPs are helpful for facilitating MKC’s housing supply and control over housing developments by allocating sites for development. NDPs have contributed to provision of housing supply through site allocation and specific policies in the plans, securing the agreement of local people by way of

the preparation of NDPs that are passed by referendums (PO9). This perspective seems to imply that NDPs are representative.

The neighbourhood plans actually had helped us [Milton Keynes]. By local people and local communities identifying the sites for development, that's actually helped us because we're trying to provide sufficient amounts of land for new homes to meet our housing needs (PO9).

That helps us [Milton Keynes], those neighbourhood plans. The allocation in those plans is part of the housing supply within the area. Those sites that have been clearly identified and obviously, people have voted in a referendum on the plan and given their endorsement to the allocation of those sites in those plans (PO9).

MKC is also relatively active in neighbourhood planning, as the council has 26 designated neighbourhood areas (NA) of which 18 have adopted NDPs as of April 2023. By February 2020, MK is one of the most active urban areas in terms of adopted neighbourhood plans alongside 17 plans in Leeds and 18 in London, although the majority of neighbourhood plans have been approved in rural areas. Planning officers illustrated that a number of NDPs have been made in MK to control and preserve unique areas and to enable parish or town councils to foster stability (PO10; PO12). Another borough planner and one Olney Town councillor represented parish or town councils as seeking to protect their area from speculative housing developments through their neighbourhood plans (TC4; PO9).

Milton Keynes is an incredibly unique place in terms of the local planning authority area. you've got a lot of diversity across the borough, in terms of economic status of residents, political control is by certain parties in certain areas. There's a lot of diversity. I think with that diversity comes a desire to have control, specific control, have more control over how land is developed in those areas (PO10).

We were getting speculative housing applications by developers for new dwellings on the adjacent villages. That was causing a lot of upset locally. One of the reasons why so many rural parishes outside the city decided to do neighbourhood plans was the protection it gave them against those speculative housing proposals (PO9).

Different areas have different goals to produce their own NDPs, whilst most areas seek 'balance' between protection and development, as one planning officer described (PO9). Olney Town and Newport Pagnell NDPs adopted very different approaches toward housing development, despite both being the same tier of Key Settlement within MK and being equally pressured by the housing allocation of the local planning authority.

Most town and parish councils including Olney Town have faced the considerable pressure of the housing target and sought ways to maintain their local area and protect its characteristics (TC1; TC2; TC3). Several councillors from Olney TC recalled the burden of meeting housing

needs figures allocated by MKC, and inevitably sought to provide the minimum number of dwellings required by the Core Strategy 2013 (Olney Town Neighbourhood Plan (ONP), 2017). They sought to produce their NDP to protect the area and to control and shape developments (TC1; TC2; TC3; TC4). In this regard, one planning officer described that ‘Some Parish Town Councils, they really want to try to keep the status quo. They want some change, but not that much’ (PO9). In contrast, Newport Pagnell set forth site allocations for several hundred more dwellings in their neighbourhood plan than was required by the Core Strategy 2013 (TC1; TC3; Newport Pagnell Neighbourhood Plan (NPNP), 2021). One borough planner suggested that ‘They [Newport Pagnell] saw development as really one of the ways that they could achieve their own aspirations and ambitions for new infrastructure and facilities within their town’ (PO9). In this sense, Olney Town Neighbourhood Plan (ONP) and Newport Pagnell Neighbourhood Plan (NPNP) were produced to reflect and address the different aspirations and priorities of each area. The following subsections explore the work and effectiveness of Olney Town and Newport Pagnell neighbourhood plans within their linked but distinct local contexts.

6.3 Olney Town Neighbourhood Plan

6.3.1 Background and motivations

Olney Town is a rural area outside the city and is located approximately 19 kilometres from Milton Keynes City (see map - Figure 17). The town was created over two hundred years ago, whilst Milton Keynes was built as a new town in the 1960s (TC3). Olney Town has a distinctive geopolitical history as it is located at the confluence of the three counties of Buckinghamshire, Bedfordshire and Northamptonshire (TC2; TC3). Councillors at Olney Town were apprehensive about the implication of ‘expansion plans’ for their neighbouring areas (TC2).

I think, Milton Keynes would like us to have more houses but of course, the more houses you have, you reduce the character of the place. That's what we're up against, I think really to be honest. We're very different beasts (TC3).

Milton Keynes Council (MKC) has sought expansion and therefore expected Olney Town as one of the Key Settlements to build additional houses. There have therefore been

controversies relating to housing allocations between MKC and Olney Town Council (OTC). The town council has been pressured to allocate more land for housing than they expected or would have been required to by Government (TC1; TC2; TC3). Local people in Olney Town raised significant concerns that the extra housing developments could undermine the historic identity of the area and the capacity of infrastructure (TC2; TC3). The town council initially expected to be able to, 'ideally restrict the number of houses, but try and actually put them in the right places, and then try and get a bit of infrastructure around that' through their neighbourhood plan (TC3). By contrast, one planner in the local planning authority (LPA) responded that if the town 'never ever have housing land supply', developers are likely to build in areas that parish or town councils do not want them to, such as the edges of the town (PO12). This officer explained that if the town has a neighbourhood development plan (NDP) and the plan allocates specific sites for housing supply, the NDP 'protects the settlement boundary' (PO12; DEV1).

Furthermore, the planning officer deemed that Olney Town had the ability to build more housing and consequently to improve facilities and infrastructure in their town through the developments. However, town councillors suggested that communities in the town desired to avoid additional housing developments particularly given a lack of relevant facilities or infrastructure such as school, GP surgeries, and transport (TC1; TC2; TC3; TC4). In addition, the local residents were concerned about the high cost of housing and the shortage of smaller and more affordable housing in the Olney Town area (TC1; TC2; TC3). This has led to the displacement of young people since most of them are unable to buy or rent housing, as several town councillors emphasised (TC1; TC2; TC3).

However, the OTC regards Olney Town Neighbourhood Plan as a useful tool to protect their area from unwanted development. A number of speculative housing schemes have been proposed by developers in new sites within Milton Keynes. A lot of rural parish and town councils are seen to 'suffer' from substantial developments and consequently decided to prepare their own neighbourhood plans (TC2; TC4; PO9). In this regard, one developer expressed that a parish or local town expects to protect the designated settlement boundary of the neighbourhood plan and protect the boundary from significant growth outside of it (DEV1). Town Councillors described how Olney Town had suffered from unexpected and inappropriate developments before the production of the ONP (TC2; TC3). However, Olney

has been able to use the plan as a force to channel development and control both planned and inappropriate developments, especially as the ONP was produced relatively earlier than other areas (TC4). Olney Town Councillors and a planning officer illustrated that if the towns do not have their own NDP, developers could keep proposing housing developments wherever they desire and town councils would be limited to managing unwanted developments (TC1; TC2; TC3; TC4; PO9). In this regard, the LPA and town and parish councils seem to deem that NDPs a protection tool for local areas, providing 'an extra layer of protection and governance in terms of how an area is developed' (PO10; PO12).

Until comparatively recently, we had a lot of speculative housing applications, because developers were proposing new sites in our opening (PO9).

In 2013, Olney decided to produce a NDP as they felt local people and the Town Council have more locally-specific knowledge about what is beneficial or harmful for their area than those who have never lived in the town (TC1). With ONP, they aimed to protect the character of their area from speculative developments, to control the shape of development in the area, to provide smaller and more affordable housing, and to manage issues raised by communities, even though they are unable to block housing developments (TC1; TC2; TC3; TC4). The following outlines why and how they prepared ONP and what challenges they faced.

6.3.2 Preparation and adoption of the neighbourhood plan

In the autumn of 2013, Olney Town Council (OTC) decided to prepare Olney Town Neighbourhood Plan (ONP) for the town and established the Olney Neighbourhood Plan Steering Group (NPSG) (TC1; ONP, 2017). The town council 'granted delegated authority in exercise of all relevant plan-making functions' to the steering group. The Steering Group was established for the preparation of the ONP and 'as the Project Board' for project management and decision-making (Olney Neighbourhood Plan Steering Group – Terms of reference). In particular, the steering group reports to the full council to make sure that all town councillors are aware of the progress of neighbourhood planning (TC1). Despite the organisation of the NPSG, a lack of knowledge of planning was a substantial challenge for the town council in neighbourhood planning. One town councillor of Olney illustrated that neighbourhood planning is 'time and labour-intensive' as the NPSG spent 'two-and-a-half years' on reading

and understanding what a neighbourhood plan was in the early stages (TC3). Most members of the steering group were unaware of neighbourhood planning at first, but one councillor who had planning knowledge and experience participated later on in the preparation of the ONP (TC1; TC3).

Members of the NPSG were a mix of councillors and local people, including a standing membership of elected councillors and residents as volunteers 'over the life of the preparation phase' (TC3; TC4). The members varied over the time it took to prepare the plan. The Group was set up 'consisting of five town councillors and five community members who were active in the community' in the early stages, and afterward changed to 'six councillors and seven community members who between them have a wide range of relevant expertise and knowledge' (ONP, 2017, p. 5; TC1; TC4). It is worth noting that Parish or Town Councils are eligible to prepare a neighbourhood development plan (NDP) but normally establish a steering group to actually lead the preparation of a NDP (while a neighbourhood forum must have a membership which comprises at least 21 individuals).

During the preparation of ONP, the NPSG held a meeting every two weeks (TC1; TC3). The group collected information, data and issues to set out policies through the surveys relating to a variety of subjects, two drop-in consultation sessions, and discussion with landowners or agents. They distributed a questionnaire to recognise households' concerns, and desires for Olney, for example, related to affordable housing and GP surgery (ONP, 2017, p. 6; TC1; TC3). Local people were involved in the production of the ONP, participating in various surveys or consultation meetings. For this, one town councillor pointed out that local communities in turn can engage in decision-making through their participation in the establishment of policies of the neighbourhood plan (TC4).

Basically, there was a group of residents in the town that had done a survey some years before to see what the town people wanted, what they felt was lacking, what they felt would be good for the town. The group that worked on the neighbourhood plan used that as a basis to come up with the first part of the plan. (TC1).

The NPSG subsequently held two consultation events to provide local people with the chance and place to ask questions about the ONP and to discuss the issues raised in the questionnaire, for example, regarding additional housing which was a significant issue during the preparation and referendum (TC1). 'The owners of all the possible development sites or their

representatives' were also engaged (ONP, 2017, p. 6). During the various stages of consultation and preparation, over 6,000 different individuals responded to the various questions which were raised (TC1; TC2; TC4). The town councillors felt that communities in the town were deeply interested, as the steering group received a significant number of responses from local people (TC3; TC4). In contrast, only a small number of retailers participated in the survey (TC3). For this, one planning officer emphasised that the most important point is of 'the appropriate publicity and consultations' rather than to what extent local people do actually participate in neighbourhood planning (PO10). This claim implies that local people are invited to have a voice (TC1), but can choose whether they participate in neighbourhood planning or not.

They [Neighbourhood Plans] have to be quite heavily consulted on. Whether or not people respond to those consultations is another matter. I think you have to assume that if the appropriate publicity and consultations have been carried out, yes, I think, you have to assume that they do represent the views of the local community and the Town Council, of course, because they're more often than not, they're the driving force (PO10).

We put questionnaires out but not everybody replied. We got very, very little response from our retail. We've got little retail shops in the High Street, very little feedback from them. We got more feedback from local residents. We fed those into the plan (TC3).

As new housing development was a substantial concern in the Olney Town area, the NPSG commissioned an independent consultant to examine the concerns and need of residents for Olney Town, including a housing survey to inform a housing needs analysis in March 2015 and community survey in July 2015 (ONP, 2017). A Site Allocations Consultation document was created in accordance with the responses to the questionnaire, since 'the numbers and locations of housing and the safeguarding of employment sites were such key issues, and there were indications of proposals being prepared by developers' (ONP, 2017, p. 6).

The dynamic planning environment and continuous change through development activities was another challenge the NPSG faced (PO12). Planning applications were constantly submitted and determined throughout the production of the ONP, and these consequently affected the evidence base for the neighbourhood plan. In this regard, one planning officer pointed out that parish or town council need to keep modifying their neighbourhood plan in line with planning applications and decisions (PO12). For example, when it comes to the allocated sites A and B of the ONP, each application had been submitted on prior to the adoption of the ONP, while the applicants were involved in the preparation of the ONP

through meeting and discussing the developments with the Olney Town Council.

The key limitation is the fact ... It's really, really, really takes a long time and effort. It's an exhausting process. It's exhausting process for everybody to create. That was obvious from everybody that I interviewed, that it was very tiring. Planning applications are coming in all the time as you're writing. If it goes on for three years, you have to keep changing it, because the planning applications change. They move everything in the app. You have to re-write it. The time, it takes to create it from scratch, that's a big issue to start with. (PO12).

OTC and NPSG co-operated with the local planning authority (LPA) in the production of ONP. Milton Keynes Council (MKC) supported them on a number of occasions with various forms of advice (TC1; TC3), as 'a local planning authority must give such advice or assistance to qualifying bodies' such as a parish or town council or neighbourhood forum (paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990). Planning officers at MKC were assigned to each of parish or town council respectively and a neighbourhood planning officer retained contact with the parish or town council to provide advice and information regarding the administration of plans and the preparation of comments back to the parish or town council on their neighbourhood plans (PO9). It is worth noting, however, that officers have been unable to maintain sustainable support after the adoption of NDPs, as one planning officer recounted (PO9).

We did that for a while, but frankly, we could not sustain that level of commitments, and we did have other priorities to do like progressing plan and then our local plan, Plan:MK. We're not as hands-on directly involved as we used to. We do assist. We provide advice. ... We have a neighbourhood planning Officer who's there to be a point of contact for Parish Town Councils, should they need advice and information. (PO9).

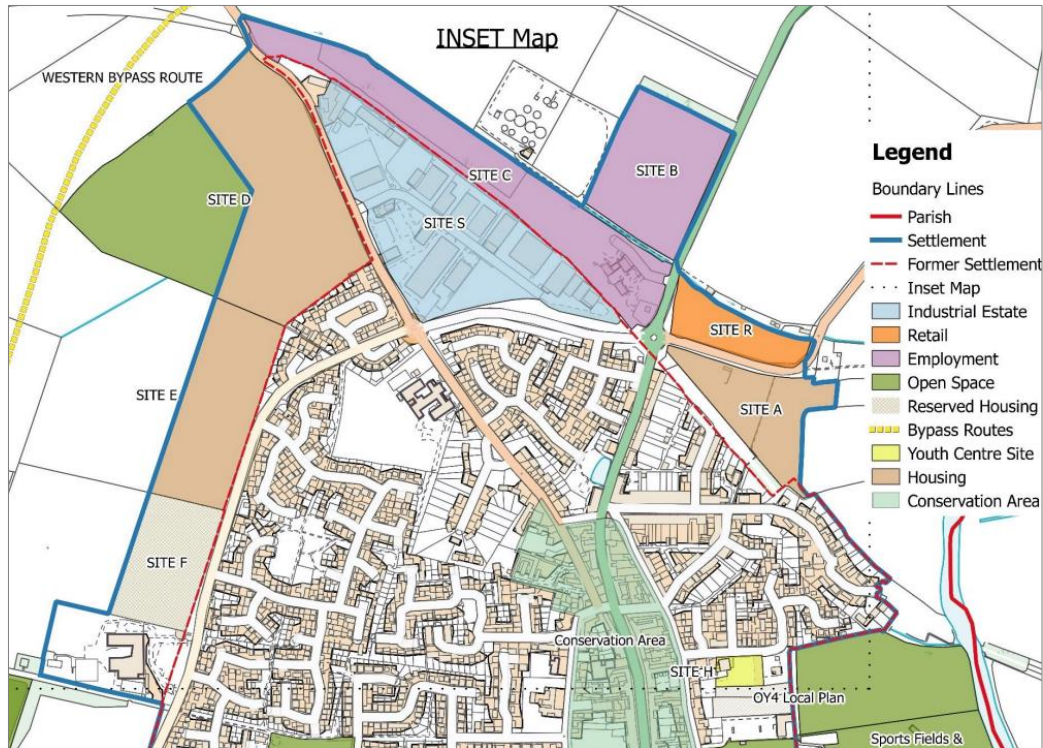
The next section scrutinises key policies, the context of establishment, and the expected potential and limitation of the policies.

6.3.3 Overview of content and aims of the neighbourhood plan

In 2017, Olney Town Neighbourhood Plan (ONP) was officially adopted. The ONP set forth 16 provisions including general and spatial policies. 7 of them were directly related to site allocation policies as guidance for particular developments, including Housing on Site A, D and E; Employment on Site B; GP surgery on Site H, and Retail on Site R. Notably, developers regarding Sites A and B were involved in the production of the ONP, since their proposals were being progressed before and during the preparation of the ONP. Policies of the ONP

were established on the basis of the issues raised by communities from the questionnaire in order to deal with site-specific issues within Olney Town Neighbourhood Area (ONA) which covers ‘all the land within the Parish boundary’ (ONP, 2017, p. 5; TC1). Despite various consultations, there were still significant controversies that ran through until the referendum.

Figure 18. Proposals map of Olney Town Neighbourhood Plan



(Olney Town Neighbourhood Plan, 2017, p. 11)

GP surgery and community project

Some non-housing projects were identified in the ONP such as relocation of a GP surgery (TC4). On the questionnaire responses, a number of local people raised concerns that the GP is ‘too small to cope with the increased demand that will arise from an increase in population’ (ONP, 2017, p. 17; TC1; TC3; TC4). Olney Neighbourhood Plan Steering Group (NPSG) therefore established Policy ONP9 (Health) and allocated Site H for ‘health, social care and community purposes’ (ONP, 2017, p. 17). As town councillors indicated community projects such as the new medical health centre for the surgery were to be undertaken with the Section 106 funding that is generated by housing developments allocated in the NDP (TC4). Despite the fact that housing developments provide local areas alternative ways for improvement and growth by addressing issues ‘beyond land-use’, substantial housing allocations from the local planning authority (LPA) still resulted in a substantial conflict in Olney.

Housing and tension

New housing development was a central issue in Olney, as a key settlement area. Milton Keynes Council (MKC) had Core strategy 2013 and was producing Plan:MK 2019 as a local plan during the preparation of the ONP. The MKC set out a 'fair' share of the rural allocation in the Core Strategy which covered the period to 2026. In August 2014, the MKC advised Olney Town to set a housing target of 325 - 350 dwellings per year to meet the requirement of the Core Strategy and 'pre-empt the need for the additional housing up to 2031 which is likely to be required through Plan MK' (ONP, 2017, p. 12). The NPSG issued a questionnaire to the town in the autumn of 2014 and stated that Olney Town had to allocate sites for 325 -350 extra homes that 'was non-negotiable' (ONP, 2017, p. 12). In early 2015, however, Newport Pagnell, another key settlement in Milton Keynes, suggested providing around 1,400 dwellings which was considerably more than the housing need figures allocated for the whole of the rural areas in the Core Strategy (see Section 6.4.2 below) (TC3; PO9; ONP, 2017; Newport Pagnell Neighbourhood Plan (NPNP), 2016). Afterwards, in February 2015, MKC responded to Olney Town Council (OTC) that a figure of 200-250 would be acceptable given the changed circumstance produced by the oversupply in Newport Pagnell, and that 'it was up to the Steering Group to decide' the number of dwellings to the neighbourhood plan (ONP, 2017, p. 13).

In August 2015, the steering group issued a Site Allocations Consultation document to all households in the Town. The document contained proposals for housing target numbers and the preferred location of sites on the basis of the responses of local residents, including a substantial demand for small and affordable housing for the young and downsizers (ONP, 2017). As the affordable homes could be only supplied through 'a larger number of homes built for sale on the open market', the NPSG set a target total of 300 houses until 2031, 'with 90 of these being [affordable] dwellings and the remainder being sold on the open market' (ONP, 2017, p. 13). In the questionnaire for an additional 300 homes, 190 responded YES, and 92 NO. (ONP, 2017). Olney Town Council accordingly allocated a total of 300 new dwellings through two policies ONP3 for 50 housing units on Site A, and ONP4 for 250 housing units on both Sites D and E in ONP. However, irrespective of consultation and indicative votes, the tension relating to the additional housing would remain throughout the production of the ONP.

Local people in Olney felt they had suffered from constant pressure due to the discrepancy in demand for housing between national and local government and communities (DEV1). MKC has been keen on expansion and consequently sought to exceed its targets by allocating a five-year housing land supply every three years since 2019 (TC2; TC3; PO9). This inclination of the LPA has put pressure on town and parish areas (TC2; TC3; PO9), with places like Olney expected to accept and meet the housing target set by MKC (TC1; TC2; TC3). In this sense, town councillors confided that they felt like victims of a housing 'numbers game' (TC1; TC2).

As noted above, the councillors argued that they did not need more housing, and were rather concerned about the lack of adequate infrastructure and the shortage of smaller and more affordable housing resulting from the excessive dwellings (TC1; TC2; TC3). Town councillors recounted that Olney Town had therefore unwillingly accepted more houses but was still concerned that 'the potential threat of larger numbers of houses was not helpful' (TC1; TC3). In this regard, one councillor illustrated that the ONP seems to be 'a stop-gap' since they have been under substantial pressure from the local authority to provide more houses and they 'cannot block' developments through their neighbourhood plan (TC3). One councillor argued that the MKC should build a new settlement to facilitate expanded housing numbers rather than growing existing older towns like Olney (TC2).

We [Olney Town Council] were expected to add to the Milton Keynes target. ... I think the problem there is that there's been so much pressure from central government and local authorities to provide housing that Milton Keynes Council probably gave in a bit too easily. ... I suppose the most contentious issue is this fact that Olney is effectively regarded as one of the main satellite towns around Milton Keynes and is constantly expected to take more housing (TC1).

There was quite a lot of local opinion that wanted to resist any sort of expansion of the town, really. ... my view of the planning system is there is very little joined-up thinking. ... no one's thinking about the doctor's surgery, about the education provision, about the roads, about local transport (TC2).

I think there can be a tension between local plans and neighbourhood plans. ... the demands on the infrastructure are excessive, really. ... when we come to revise the plan again over the next year or two, I should think, our attitude to expansion will be much more negative because there needs to come a point now where infrastructure catches up with the tail as it is (TC2).

One MKC planning officer noted that that Olney Town seemed to want a neighbourhood plan in order to be beyond the control of MKC:

Olney is a town often considers itself not to be a part of Milton Keynes as well. I have heard that from residents before. There might be a feeling that they do not like really being tethered

to Milton Keynes and affected by Plan:MK is an extension of that. I think maybe that played a part as well. They desire to have their own neighbourhood plan in place so they were not at the mercy of the policy being created in Milton Keynes, or perceived to be created in Milton Keynes (PO10).

In practice there were different aspects to the ONP in terms of delivery of housing between MKC and OTC. One planning officer at Milton Keynes considered a NDP a useful tool to provide land for housing development (PO9). On the contrary, local people assumed that an NDP was not needed to allocate additional dwellings since there was already sufficient housing in the Town (TC2; TC3; PO9). MK officers saw this as Not in My Back Yard (NIMBY)-ism; and argued that a parish or town council should be responsible for provision of housing sites in order to supply affordable housing in the local area and should consider the development and growth of the area (PO9). Furthermore, the officer pointed out that many areas see conflicts of interests between landowners or developers and local communities, since they have different perspectives on the use and development of land: (PO9).

I'm a bit concerned that the neighbourhood plan ... It is not going to take fully into account all the factors you need to consider in the growth and development of the area. ... Perhaps sometimes the perception of neighbourhood plans is they're very nimby, not in my backyard (PO9).

The key tensions, localism versus national need. It's all very well for a neighbourhood plan to say, 'We really don't want any development at all' the extremists but how does that sit with perhaps you do need to provide homes or affordable housing for your community. Arguably, it's been very irresponsible not to cater for those needs (PO9).

That can be quite contentious that the landowner may want that site developed for housing, but local community may want that Greenfield site to stay broken space. ... That can be quite an issue. Each area is different, very idiosyncratic, but they clearly can be conflicts between perhaps these interests of a landowner and the interests of that community who might have different perspectives on what pieces of land should be useful (PO9).

Olney TC was more interested in securing affordable housing for young people through the ONP, since the young have suffered from expensive and larger dwellings and would be displaced due to high house prices (TC1; TC2; TC3). Although there are primary, middle, and secondary schools in the town, the size of the schools has gradually reduced due to the number of families leaving due to housing costs (TC3). Furthermore, town councillors pointed out that developers prefer to build large houses with four or five bedrooms, whilst Olney has been short of smaller properties with one, two or three bedrooms for younger people 'that are just starting on the housing ladder with maybe one or two bedrooms' (TC1; TC2). One town councillor and planning officer similarly expressed that housing is often more expensive

and more unaffordable in rural areas including Olney Town than in urban areas (TC1; TC3; PO9).

Affordable housing, some of which will be affordable to buy and some which will be affordable to rent. Hopefully, that will help the situation in the town and help some of the younger people that are growing up here to stay in town (TC1).

As a result, Olney TC sought to prioritise sites for housing development including affordable homes through the ONP (TC1; TC3). The town accordingly set out Policy ONP6 affordable homes in the light of Core Strategy 2013 - 'In any development of 15 dwellings or more, 30% of those dwellings are required to be Affordable' (Milton Keynes Core Strategy 2013, p. 71; ONP, 2017, p. 21). ONP set forth more detailed requirements for affordable housing to reflect locally-distinctive circumstance, as below.

25% of all new Affordable Housing provided by the Plan will initially be subject to the Local Connection Policy, such that people with a strong local connection and whose needs are not met by the open market will be first to be offered the tenancy or shared ownership of the home. Proposals for development will need to consider local housing need and should provide a tenure mix of 10% of the dwellings being for shared-ownership (intermediate housing), and 20% for Affordable rent. That Affordable dwellings are situated in groups of six dwellings or fewer, spread across the development. (ONP, 2017, p. 21).

Representativeness and controversy

The ONP was only narrowly approved in a referendum on 6 July 2017, although the policies of the plan were formulated on the basis of interests and priorities of local people in the ONA (TC1; TC2; TC3; PO9). While the turnout of 38.32% was higher than average rate of 32% in 2019 (Ministry of Housing, Communities & Local Government (MHCL), 2019), the result saw just 50.6% of those voting in favour of the ONP, 991 as opposed to 968 who voted against. One planning officer explained that 'It was clearly dividing the community because the margin was so tight' (PO9). This highlights that the plan remained local controversially, raising questions with regard to the representativeness of the ONP.

In our case, the referendum was a bit of a knife-edge. Whereas a lot of other towns and villages managed to get theirs through quite easily, we actually had a group opposed to ours that actually leafleted the town and suggested that people should vote against it, which was a bit unfortunate because clearly, we wanted it to go through. Indeed, we did get it through in the end, but not by quite such a large majority as we would have liked (TC1).

During the preparation of ONP, the ward councillor questioned why Olney needed a

neighbourhood plan as the additional housing going to Newport Pagnell could cover the housing allocation for the town (TC3). Some residents in Olney therefore deemed that a NDP was unnecessary as the town already had sufficient dwellings (TC1; TC3). They leafleted in the town to suggest that local people should vote against the ONP (TC1; TC3; PO9). Nevertheless, the town councillors maintained that the town had to build more housing irrespective of Newport Pagnell, and assumed that if there were no neighbourhood plan for Olney Town, developers may pursue speculative applications (TC1; TC3). The town councillors recalled how they attempted to persuade residents that the ONP would help control unplanned and unwanted developments, and act as a tool to protect the local area (TC1; TC3).

What we tried to explain was, if the neighbourhood plan was supported, we would actually have some say as to where the housing went, whereas if the neighbourhood plan was lost, and people voted against it, then it was likely that the landowners wanted to develop on fields, and they would dictate where the housing should go, and we wouldn't have a say in the process (TC1).

Through this process, town councillors recognised that inclusion is a key element of the production of a NDP and promised that the town council would engage more effectively during the revision of the ONP (TC1; TC3).

Literally to try and engage, certainly the lessons that I would probably take forward. Certainly, when we do further iterations, further changes to our neighbourhood plan, engage with the community as soon as possible, go to the community. ... Getting out there, doing more on the streets, to actually go to the population a little bit and get more ideas sooner, so that you obviously get their suggestions into the plan (TC3).

Transportation and limitation

Some local people raised concerns about 'traffic congestion and the prospect of a bypass' in their responses to the survey during the preparation of the ONP (ONP, 2017, p. 17). The ONP suggested 'OBJECTIVE 9' and set forth transport policy 'ONP16 – OLNEY BYPASS' (ONP, 2017, p. 35). However, the details were mostly copied from the 2005 MKC Local Plan and the Local Transport Plan 3 - 2011 to 2031; and the policy was designated without specific requirements (Figure 19; see ONP, 2017, p. 35).

Figure 19. Objective and policy for transport in Olney Town Neighbourhood Plan

14. OBJECTIVE 9
TO REDUCE TRAFFIC PROBLEMS
<p>14.1. There were many comments in the responses to the questionnaire about traffic congestion and the prospect of a bypass. MKC's existing policies are set out in two documents. Firstly, the 2005 MKC Local Plan policy TC2 lists the removal of HGV traffic as a priority for improving the town centre. Secondly, policy HTo21/HTo22 in the Local Transport Plan 3 - 2011 to 2031 (LTP3) "A Transport Vision and Strategy for Milton Keynes" states:</p> <p><i>"The council supports, in principle, the Olney and Bletchley Southern bypasses subject to design, feasibility (including affordability), public consultation and funding. These two new roads projects will ease traffic and air pollution in Olney and Bletchley, as well as easing traffic accessing Central Milton Keynes on arterial routes."</i></p> <p>14.2. Also, policy HTo5 states:</p> <p><i>"Of particular note is Olney, which has poor air quality, partially caused by goods vehicles. A bypass is supported by the council, and will be subject to further feasibility testing and community engagement on all options considered. Before then, the council will work closely with the Highways Agency to find ways to route heavy vehicles away from Olney and other rural communities onto alternative routes which are designed to carry HGVs".</i></p> <p>14.3. The town council will continue to engage with Milton Keynes council and SEMLEP to bring forward plans for a bypass.</p>

POLICY ONP16 – OLNEY BYPASS
<p>Planning Permission will be refused for development that would prejudice the construction of the following roads:</p> <ul style="list-style-type: none"> • Olney Bypass (western option). • Olney Bypass (eastern option).

When it comes to the issues duplication, planning officers highlighted that tailored and ‘distinctive policies’ in NDPs were more influential than reiterating policies which are already in the local plan (PO10; PO10; PO12). Several town councillors pointed out that the ONP was restricted to addressing narrowly defined ‘land-use’ issues, although local people suffered from severe traffic problems passing through the town and were keen to improve infrastructure and the transport system (TC2; TC3; TC4; Correspondence of Milton Keynes Council (MKC), 2022).

Moreover, one town councillor stressed that the limitations are placed on NDPs by central government, since the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) does not allow a neighbourhood plan to address wider issues such as transport that lie beyond planning matters (TC4). The government suggests that the plan-making group need to ‘consider’ infrastructure and ‘consult’ infrastructure providers (<https://www.gov.uk/guidance/neighbourhood-planning--2>). Consequently, the policy ONP16 was only able to address traffic and transport for ‘safeguarding two potential routes for a bypass that would go east or west around the town’ (TC4).

The parish council may approach highway colleagues in the preparation of their draft plan, particularly to identify potential highway issues with housing allocations. However, it is the parish's call as to whether they want to engage with the Council at an early stage. ... Policies in the neighbourhood plan must relate to land use. (Correspondence of Milton Keynes Council (MKC), 2022)

This subsection has introduced the policies of ONP and explained how they were designated in line with the concerns and interests of local residents, whilst setting out controversies regarding the necessity of a neighbourhood plan within the local communities. The ONT cannot ignore the requirements set by the local plan and cannot deal with local affairs beyond the land-use issues. Thus, the impact of ONP and its policies are bounded by the frame which central and local governments define under the hierarchical planning system in England. The following explores the interaction between ONP and the local plan within a complex and dynamic planning context, addressing how the local plan affects ONP and ONP in turn affects the subsequent local plan.

6.3.4 Interaction with the Local Plan

This section scrutinises how Olney Town Neighbourhood Plan (ONP) interacts with the local plan post-adoption. ONP has complex relationships with two different versions of the local plan. To be specific, ONP was produced in 2017 on the basis of Core Strategy (2013) and saved policies of the Local Plan (2005). Plan:MK 2016 - 2031 as a local plan then replaced the Core Strategy and formed part of Milton Keynes Council (MKC)'s Development Plan in 2019.

The emerging Plan:MK was taken into account during the production of the ONP, since the production of the local plan was in progress, as one town councillor described (TC4). In general, the local plan and neighbourhood plan were examined in tandem (PO12). When the local plan is reviewed on a periodical basis, planning officers normally take all existing neighbourhood development plans (NDPs) and their allocated sites into consideration, as one borough planner described (PO12). One town councillor accordingly felt that the Plan:MK reflected their neighbourhood plan as Olney Town Council (OTC) was involved in the various consultations and examinations in public of Plan:MK (TC4). Despite consultation between Milton Keynes Council (MLC) and OTC, the local planning authority (LPA) ostensibly addresses 'areas' themselves in the local plan rather than mentioning particular NDPs. As for Olney

Town, there are no significant changes between Milton Keynes Core strategy 2013 and Plan:MK 2019. The status of Olney was maintained as a Key Settlement (Milton Keynes Core Strategy 2013; Plan:MK, 2019), whereas the centre of Olney was merely renamed from a Town centre to a District centre in Plan:MK on the basis of the National Planning Policy Framework (NPPF), although the tier is effectively the same as before (Plan:MK, 2019).

Notably, the local plan enables town or parish councils to allocate sites for developments through their own NDPs (Plan:MK, 2019). According to Policy DS2 of Plan:MK– Housing Strategy, new housing development will be delivered by ‘small to medium scale development within rural and key settlements, appropriate to the size, function and role of each settlement to be delivered through allocations in neighbourhood plans currently being prepared’ (Plan:MK, 2019, p. 19). In this regard, MKC in the Core Strategy 2013 and Plan:MK 2019 stated that NDPs in rural areas allocate development sites (Milton Keynes Council (MKC)’s Core Strategy 2013 - Site Allocations Plan Annex C, no date; MKC’s Site Allocations Plan, 2018). This implies that the LPA has to some sought to empower town and parish council through neighbourhood plans.

Originally, the Core Strategy proposed that the Site Allocations Plan would also release development sites in the rural area. However, since the adoption of the Core Strategy, this role has largely been fulfilled by the introduction of neighbourhood plans. The settlements of Newport Pagnell and Olney alone are providing 1700 homes through their respective neighbourhood plans. (Milton Keynes Council (MKC)’s Core Strategy 2013 - Site Allocations Plan_Annex C, no date, p. 3; MKC’s Site Allocations Plan, 2018, p. 3)

In addition, one planning officer noted: ‘if there have been any allocations in neighbourhood plans that have not a bit been taken forward, we [Local Planning Authority] are incorporating those within Plan:MK. We may have to explain and justify the reasons why we're doing that’ (PO9). This response indicates that the LPA considered and reflected existing neighbourhood plans in the production of the local plan (PO12).

If we are proposing a site as a local authority in a local plan, some people may not agree with us. A Parish/Town council may not agree with us. They're at perfect liberty for them to suggest alternatives (PO9).

Time Lag and precedence

One issue of potential challenges for NDPs is the relationship to new or revised local plans

due to dates of production, as NDPs are expected to conform with high-tier planning policies (PO9). In this sense, the effectiveness of ONP is limited by Plan:MK 2019, since the latest plan overrides the older plan in decision-making, as town councillors, planning officers, and developer pointed out (DEV1; TC2). In other words, the latest plan has precedence in determination of planning applications, according to the National Planning Policy Framework (NPPF) paragraph 31 and Planning and Compulsory Purchase Act 2004 s38(5):

- The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals (National Planning Policy Framework (NPPF), 2019, para 31).

Planning officers and one town councillor consistently recounted that the LPA attaches more weight to the most updated plan in decision-making (PO9; PO11). Hence, one planning officer suggested that 'that can always be a conflict in terms of local people in a local area ... You have to keep them up to date' (PO12):

- The Olney Neighbourhood Plan ... it's an older plan as there's a Plan:MK superseded it eventually when it came down to a decision and a planning ballot on the planning application. ... In government, the latest plan then can jump the other one eventually ... When we're doing a planning application, we have to look at the Local Plan and the Neighbourhood Plan together. ... if there's any conflict, it's a question of finding balance. As I say, If the neighbourhood plans are older than our Local Plan, then it's got less weight. If it's more recent, then it's got more (PO12).

Moreover, the time-gap can be 'a potential source of conflict' on determination of planning applications with respect to precedence (TC2), Notably, readers and users of development plans are likely to face different policies at a specific moment in time. Maps for policies have changed over time, for example, and consequently the legend, and boundaries are different in the previous Proposals Map of Milton Keynes 2005, the neighbourhood area of the ONP 2017, and the last Policies Map of Milton Keynes 2019. In this context, ONP 2017 did affect the subsequent local plan. Precedence and information discrepancies due to time-gaps significantly impacted on the determination of applications, for example, with regard to Sites B and Sites R which were designated in the ONP 2017, as will be further discuss in the following section.

Figure 20. Proposals Map of Olney Town Neighbourhood Plan 2017

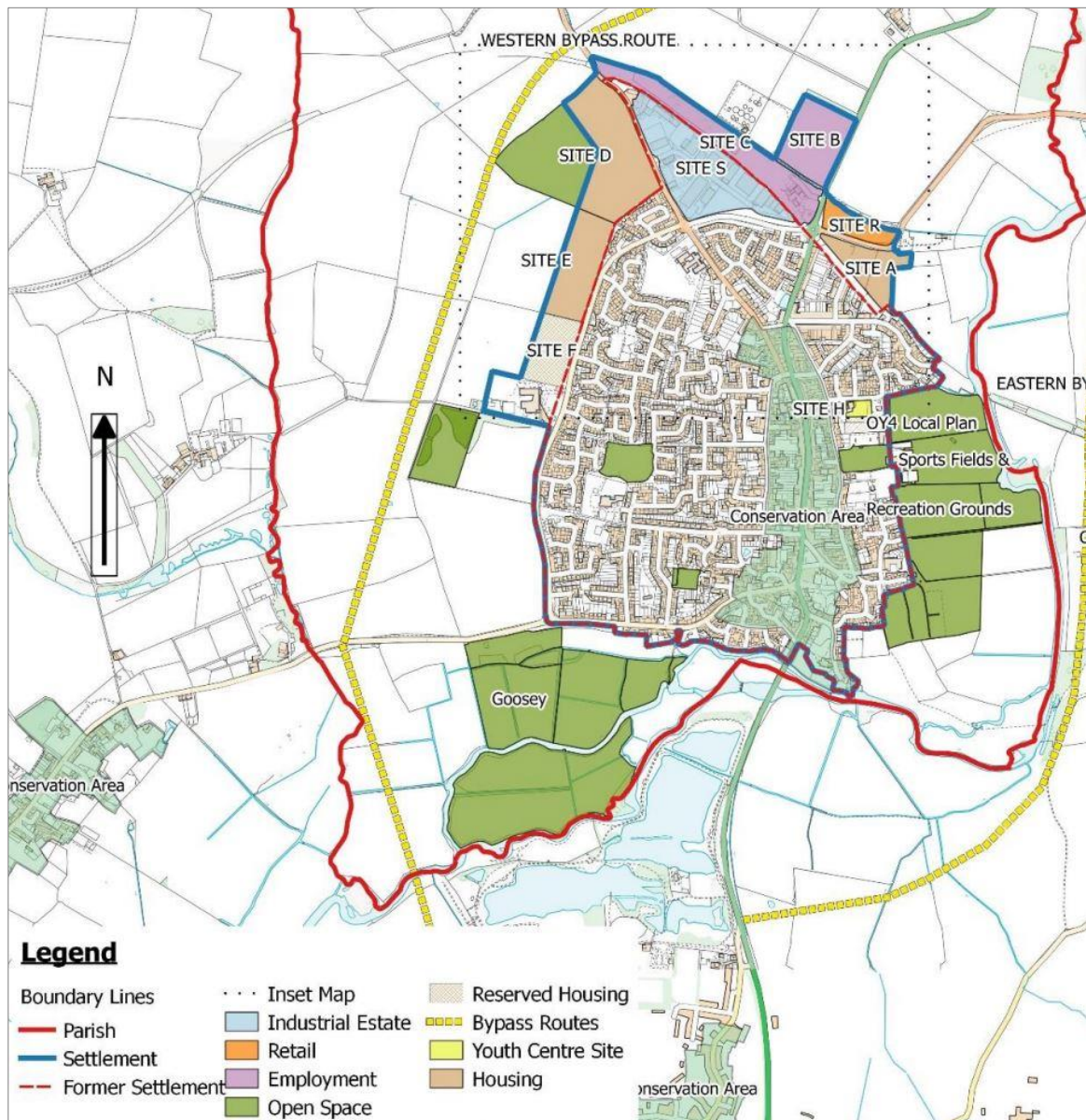
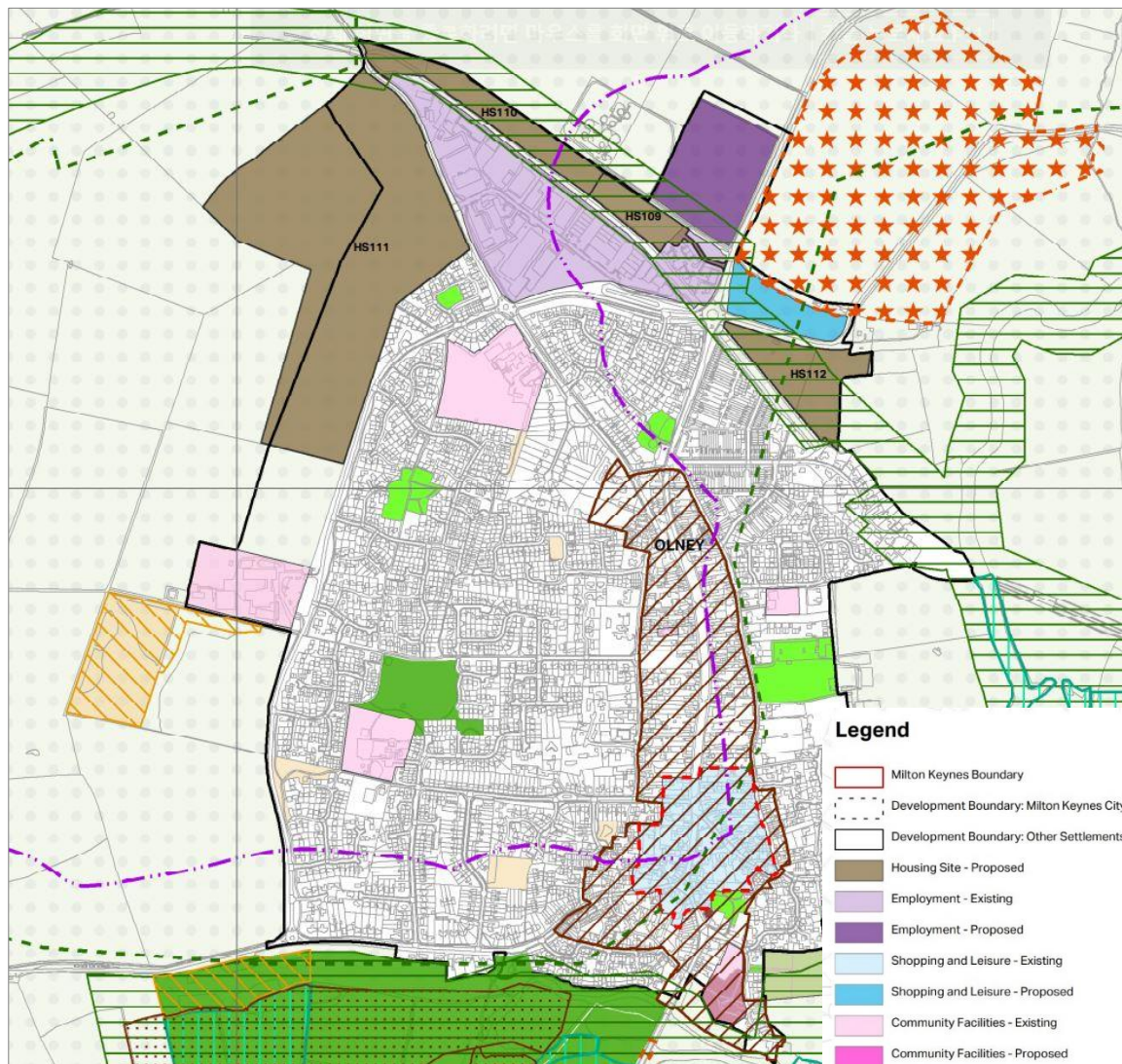


Figure 21. Policies Map of Plan:MK 2019



The process of continuous review and updating

The time-gap and its influence raise a need for on-going involvement of neighbourhood planning groups (NPGs) in the implementation of NDPs. One councillor referred to this situation as ‘a game of leapfrog’, since the neighbourhood plan is adopted, the local plan is revised and consequently the neighbourhood plan needs to be updated again (TC2). For example, ‘if Milton Keynes puts in place another local plan that postdates our neighbourhood plan’ and ‘if tomorrow a new local plan is finally put in place, then that will take precedence over the neighbourhood plan’ (TC2). That is one of the key reasons that they constantly keep revisiting and updating their neighbourhood plan, as one town councillor noted (TC1).

My understanding is that the reality of the planning system is such that that neighbourhood plan can be superseded by later local plans that are developed by, say, Milton Keynes Council. If they bring forward another local plan after the date of our neighbourhood plan, then that plan can take precedence over our neighbourhood plan (TC2).

All interviewees at Olney Town recounted that they sought to update the ONP in order to avoid having ‘a limited shelf life’ of their plan itself and to maintain the impact of their plan in decision-making (TC1; TC2; TC3; TC4; PO12). In this regard, one officer suggested, with The Local plan requiring review at least every 5 years, ‘The best time to do a neighbourhood plan is just after the local plan’ (PO9).

Despite the necessity of revising the plan, one town councillor illustrated that the time gap is ‘a major failing of the whole point of having a neighbourhood plan’ since the neighbourhood plan can be overtaken by the local plan again during its lifetime (TC2). The councillor illustrated that continuous reviewing and updating is an onerous duty on the town council (TC2).

When the plan was put to referendum, they thought that's everything's settled until 2031. The reality is that's not true. What happens is if you have a later local plan put forward (TC2).

The only way that you can maintain some real authority for your neighbourhood plan over the longer term is to be constantly revising and updating it so you're always jumping over the latest local plan. To what degree small local councils have the enthusiasm for that will vary, I think, from place to place (TC2).

This section identified a constant interaction ‘post-adoption’ between local plans and ONP, as the ONP was affected by the existing local plan and in turn affected the subsequent local plan. The time-gap also impacts decision-making on planning proposals. Furthermore, this requires OTC to continuously monitor the changing local plan and revise the ONP to maintain its status and effectiveness. The following section now moves on to scrutinise the use of ONP through the process of decision-making on particular planning proposals.

6.3.5 Role of the neighbourhood development plan in decision-making

This section explores the use of Olney Town Neighbourhood Plan (ONP) throughout the process of decision-making within Olney Town Neighbourhood Area (ONA) in quantitative and qualitative ways. The first part examines the degree to which ONP and its policies have been referred to, and by whom in key stages during the progress of decision-making. The

second part scrutinises why and how actors use and interpret policies from the ONP, the extent to which ONP influences the perception and attitude of actors, and whether and how the ongoing activities of Olney Town Council (OTC) affect the determination of planning schemes.

1) Quantitative overview

This first part examines the effectiveness of ONP, by exploring the extent to which ONP and its provisions have been used in documents that are officially taken into consideration at the key phases throughout the process of decision-making. As in the previous chapter, the analysis focuses on 'decided' applications, and covers the key documents including applications, consultation responses, public responses, reports of planning officers, minutes of the Planning Committee (formerly known as Development Control Committee), decision notices, and appeal decisions. This involves a variety of key actors including applicants, OTC, other statutory consultees, local people, planning officers, councillors of the Planning Committee, appeal inspectors, and those who are affected. The level of citation illustrates to what extent the ONP and its policies have been perceived and used by key actors in decision-making. The analysis also explores the effectiveness of the ONP on the whole of ONA and on the allocated sites respectively. Decided applications from 2017 until 2021 and their relevant documents were investigated with 95 in the whole of the ONA including 12 proposals within the allocated sites.

Citation of the Olney Town Neighbourhood Plan itself

When it comes to the proposals, 37 of a total of 95 researched planning schemes included planning or design statements, while 58 proposals were submitted with 'only' an application form. In this sense, eight (21.62%) out of 37 planning applications cited the ONP in the whole of the ONA, while six (66.67%) of nine applications did within the allocated sites. As we might expect, the ONP has therefore been taken into account more within the allocated sites than in the whole of the ONA at all key stages, as can be seen in Table 7. This clearly indicates that policies with site allocations have more significant impact in the implementation of the neighbourhood development plan given the number of citations, spatial policies are normally designated with specific priorities and requirements for particular sites.

Applicants, town councillors, residents and consultees do not have to refer to NDPs. This

implies that the use of the plan significantly depends on the perception and volition of actors. For this, one developer illustrated that 'Irrespective of whether the neighbourhood plan is adopted or not, the planning application process, people could still object or support at a planning application level' (DEV1). This raises a question about the usefulness and necessity of NDPs. Notably, OTC has commented on 22 (23.16%) of 95 proposals, while the council emphasised the significance of consultation responses during interviews. It should be noted that, as discussed in Chapter 4.4.2 with regard to the Methodology and Methods chapter, the quantitative data reveals some contradictions between the statements of interviewees and their actual actions in practice.

Furthermore, unlike applicants and consultees, planning officers are required to take neighbourhood plans into consideration in the light of the National Planning Policy Framework (PO12). One planning officer responded that they interpret and use policies of the neighbourhood plan to review and determine whether planning applications abide by the neighbourhood plan (PO10). Hence, officers write a report even if the neighbourhood plan has no relevant policies on planning applications (PO10; PO12). The ONP has been taken into consideration by the majority of planning officers in 70 (73.68%) of 95 reports. The OTC therefore felt that the officers review proposals against the ONP:

The officers at Milton Keynes, when they are determining planning applications, are putting more and more weight on the neighbourhood plan, which we're really pleased about (TC1).

The officers stated that application sites are within the ONA but there are 'no policies' relating to the development on 33 (34.74%) of 95 reports. Notably, two officers even incorrectly described the 'approved' ONP as 'supplementary planning documents' on five (9.52%) of 21 reports, supplementary documents are a material consideration but have less status than the development plan. This is legally incorrect. In addition, the ONP has been much more rarely cited on decision notices, since a neighbourhood plan is normally referred to only if there is a particular reason to refuse or grant a proposed development, as one planning officer explained. This results from the type of development and the range of policies in a NDP. As will be discussed below, most planning proposals within ONA are householder or minor developments and, accordingly, the NDP rarely set forth provisions to address such kind of planning items.

Citation of policies of the Olney Town Neighbourhood Plan

Differently Policies in the ONP have been differentially cited, as can be seen in Table 8. Three policies including ONP7 (housing type and design), ONP13 (retail), and ONP15 (Parking and accessibility) have been taken into account in more than 10% of 95 proposals, while nine (56.25%) out of 16 policies of the ONP were cited less than 5%. One policy (ONP10 – assets of community value) has ‘never’ been cited in the researched cases. It is noteworthy that policies of the ONP have been referred to only 80 times in total across all documents in the 95 proposals including consultation responses, planning officer’s reports, minutes of the committee, decision notices and appeal decisions. This suggests that the policies of ONP have not been widely used in decision-making. It also implies that the policies seem to be less practical in addressing locally-specific issues or priorities.

Type of development and site allocation

The low citation of the ONP has been significantly related to the type of development coming forward, according to the analysis. The majority of schemes in the ONA were related to householder or minor developments, which policies in the ONP rarely deal with (PO11; PO12). In other words, NDPs are normally less influential in minor developments but may be more influential in relation to major developments (PO10; PO11; PO12). In practical terms, the purpose of an NDP is not necessarily to guide what single storey rear extensions look like (PO10; PO12).

The ONP is relatively more well used and considered on the allocated sites, comparing to the whole of the ONA. The ONP set out policies on allocated sites with specific justification and requirements for each, including proposed uses (industry, retail, employment and housing). In this regard, planning officers suggested that NDPs need to focus on particular sites within key parts of neighbourhood areas rather than addressing all planning issues in the local area in order to be more effective (PO10; PO12).

It should also be remembered that quantitative data has limitations in identifying the potentially invisible aspects of the performance of NDPs, since ‘no citation’ or silence of actors may also be a sign of influence. Although there is a lack of empirical evidence for ONP, as discussed in Chapter 5.5.5, NDPs can work as gatekeepers, since policies may deter certain

applications from even coming forward. Hence, the following explores the work of ONP in interaction with its external environment, focusing on how actors use and interpret the plan and the extent to which this influences determination of planning applications.

Table 7 Citation of Olney Town Neighbourhood Plan in decision-making

Documents	In the whole neighbourhood area Total 95 decided applications				Within allocated sites Total 12 decided applications			
	Figure of submitted documents	% of the submission	Figure of citation	% of the citation of the NP**	Figure of submitted documents	% of the submission	Figure of citation	% of the citation of the NP**
Statements of application	37	38.95%	8	21.62%	9	75.00%	6	66.67%
CR of the OTC	22	23.16%	5	22.73%	11	91.67%	5	45.45%
PR of residents	27	28.42%	1	3.70%	6	50.00%	1	16.67%
CR of other formal consultees	40	42.11%	5	12.50%	11	91.67%	5	45.45%
Report of planning officer	95	100.00%	70	73.68%	12	100.00%	11	91.67%
Minute of the Development Control Committee	3	3.16%	3	100.00%	3	25.00%	3	100.00%
Decision Notice	95	100.00%	1	1.05%	12	100.00%	1	8.33%
Appeal Decision	2	2.11%	1	50.00%	1	8.33%	1	100.00%

* CR: Consultation response, PR: Public response, OTC: Olney Town Council

** % of the citation = a number of citations of the neighbourhood plan / a number of the submitted documents × 100

Figure 22 Citation of Olney Town Neighbourhood Plan in decision-making

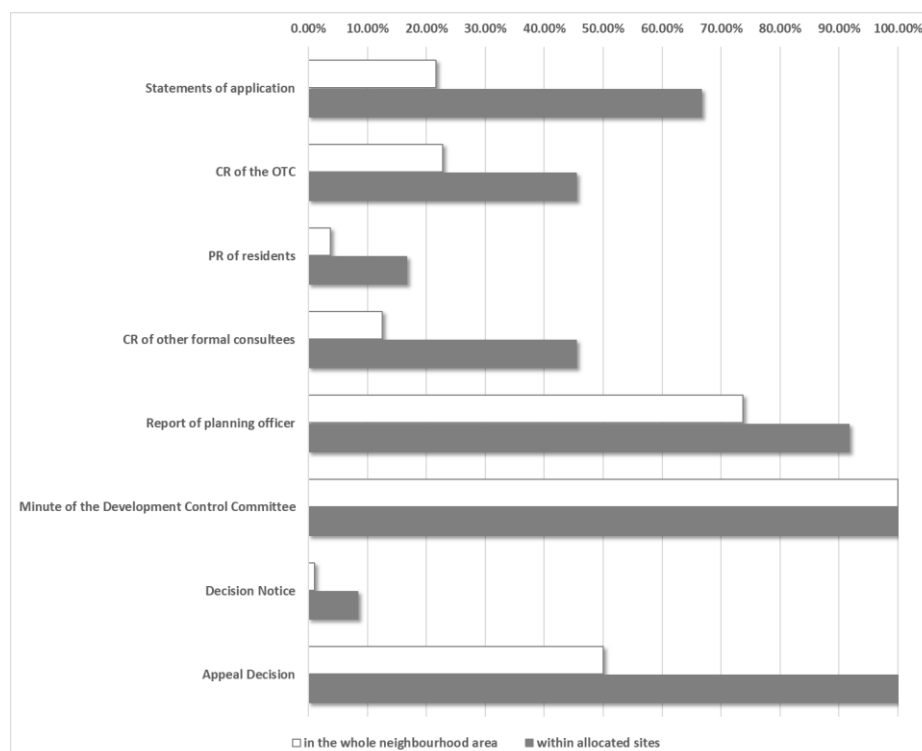
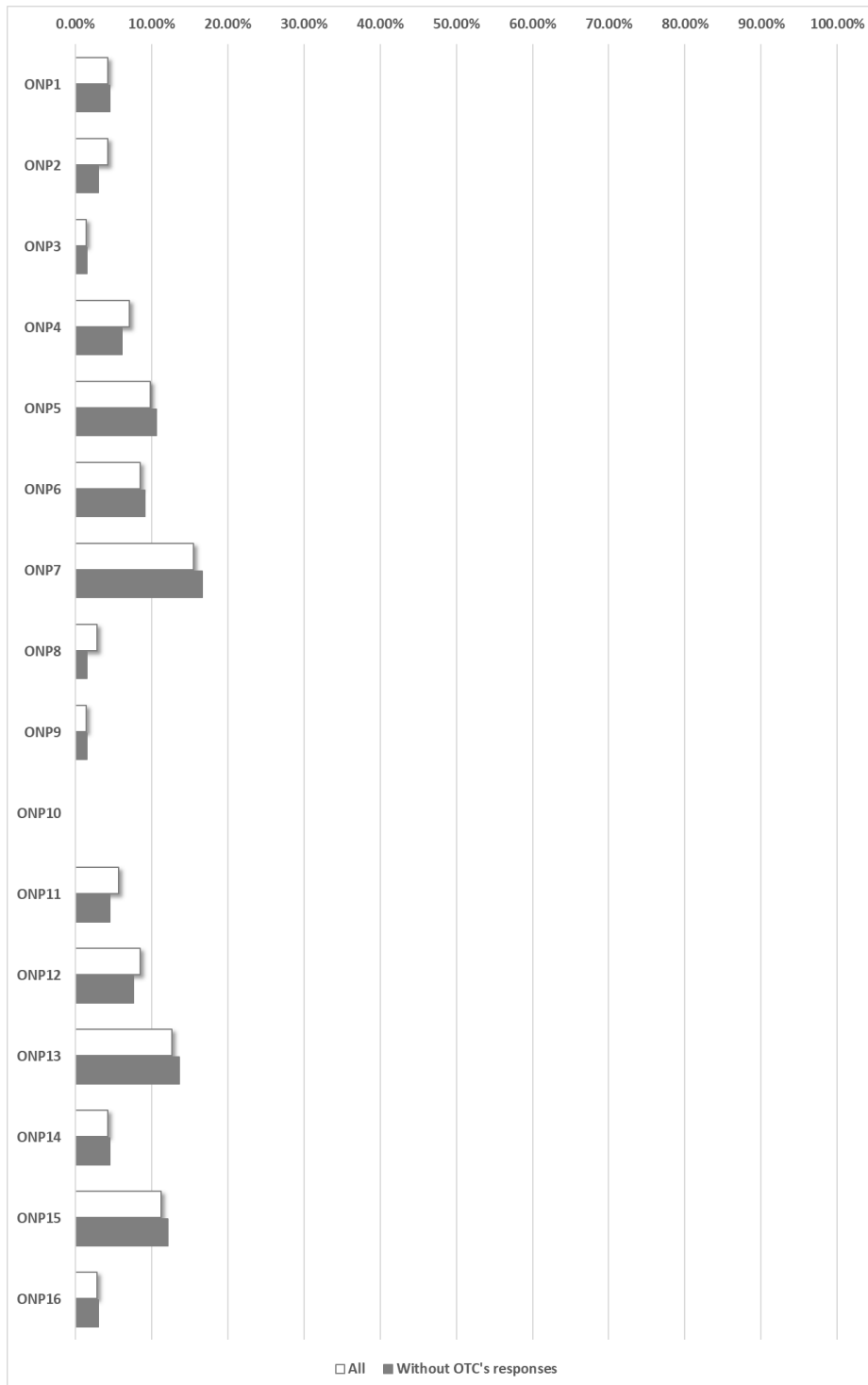


Table 8 Citation of policies of Olney Town Neighbourhood Plan in decision-making

Policies of Olney Town Neighbourhood Plan	Figure of citation on documents for 95 applications		Without the OTC's responses	
ONP1: HOUSING NUMBERS	3	3.75%	3	4.00%
ONP2: HOUSING LOCATION	3	3.75%	2	2.67%
ONP3: SITE A	1	1.25%	1	1.33%
ONP4: SITES D AND E AND ASSOCIATED OFF-SITE GREEN INFRASTRUCTURE	5	6.25%	4	5.33%
ONP5: INFILL SITES AND WINDFALL SITES	7	8.75%	7	9.33%
ONP6: AFFORDABLE HOMES	6	7.50%	6	8.00%
ONP7: HOUSING TYPE AND DESIGN	11	13.75%	11	14.67%
ONP8: COMMUNICATIONS INFRASTRUCTURE	2	2.50%	1	1.33%
ONP9: HEALTH	1	1.25%	1	1.33%
ONP10: ASSETS OF COMMUNITY VALUE	0	0.00%	0	0.00%
ONP11: SAFEGUARDED EMPLOYMENT LAND	4	5.00%	3	4.00%
ONP12: NEW EMPLOYMENT LAND	6	7.50%	5	6.67%
ONP13: RETAIL	9	11.25%	9	12.00%
ONP14: OPEN SPACES	3	3.75%	3	4.00%
ONP15: PARKING AND ACCESSIBILITY	8	10.00%	8	10.67%
ONP16: OLNEY BYPASS	2	2.50%	2	2.67%
OBJECTIVE 1: TO ENSURE THAT ALL NEW HOUSING MEETS THE MILTON KEYNES COUNCIL CORE STRATEGY REQUIREMENT FOR OLNEY	0	0.00%	0	0.00%
OBJECTIVE 2: TO ENSURE THAT THERE IS SUFFICIENT LAND TO MEET FUTURE HEALTH AND COMMUNITY NEEDS	0	0.00%	0	0.00%
OBJECTIVE 3: TO ENSURE THAT THERE IS SUFFICIENT LAND AVAILABLE TO MEET FUTURE EDUCATIONAL NEEDS	0	0.00%	0	0.00%
OBJECTIVE 4: TO ALLOCATE LAND FOR EMPLOYMENT USE AND SAFEGUARD THE EXISTING STILEBROOK ROAD INDUSTRIAL ESTATE	0	0.00%	0	0.00%
OBJECTIVE 5: TO ALLOCATE LAND FOR RETAIL USE	0	0.00%	0	0.00%
OBJECTIVE 6: TO PROTECT AND ENHANCE THE CHARACTER, APPEARANCE, VITALITY, VIABILITY AND SIGNIFICANCE OF THE HISTORIC TOWN CENTRE AND CONSERVATION AREA, AND OTHER HERITAGE ASSETS IN TOWN	7	8.75%	7	9.33%
OBJECTIVE 7: TO PROTECT, ENHANCE AND PROVIDE ADDITIONAL OPEN SPACES, COMMUNITY FACILITIES AND SPORTS AND RECREATION FACILITIES, BOTH WITHIN THE TOWN AND BETWEEN THE TOWN AND THE RIVER OUSE	0	0.00%	0	0.00%
OBJECTIVE 8: TO IMPROVE PARKING, ACCESSIBILITY, PEDESTRIAN AND CYCLING ROUTES THROUGHOUT THE TOWN	1	1.25%	1	1.33%

OBJECTIVE 9: TO REDUCE TRAFFIC PROBLEMS	0	0.00%	0	0.00%
OBJECTIVE 10: TO USE FUNDS ARISING FROM DEVELOPER CONTRIBUTIONS FOR IMPROVEMENTS TO FACILITIES AND INFRASTRUCTURE	1	1.25%	1	1.33%
Total	80	100.00%	75	100.00%

Figure 23 Citation of policies of Olney Town Neighbourhood Plan in decision-making



2) Case study applications

Olney Town Neighbourhood Plan (ONP) has been used during the decision-making process, but its effect depends on various elements such as the date of production of plans, material considerations, and actors' perception and interpretation in the discretionary planning system in England (Chapter 2). This second part tracks particular planning applications to understand how the ONP has been taken into account and the degree to which each actor recognises and uses policies of the ONP to prepare and assess the proposal during the process of decision-making. Two proposals are subject to related to case study and each application is related to a specific site and policy designated in the ONP. One scheme complied with the ONP, while the other application was contrary to the plan.

Site B of Policy ONP12

Site B is the Land to the South west of Warrington Road Olney and was set out for employment led mixed use development and is identified in Policy ONP12 of the ONP (See map – Figure 18 in Section 6.3.3) (Delegated Report of Ref. 17/03335/OUT). An outline planning application (Ref. 17/03335/OUT) was submitted on that site in December 2017. The application was affected by the development plan documents including Milton Keynes Core Strategy (2013), Milton Keynes 'Saved' Policies, and the ONP (2017). The applicant also took the emerging Plan:MK 2019 into account, as it was being progressed at the time of decision-making.

The ONP was significantly influential in determination of the planning application. According to the Proposals Map of the Milton Keynes Local Plan 2001-2011, Site B was previously identified as Open Countryside making it significantly less available for development than land within the development boundaries (Planning Statement of Ref. 17/03335/OUT; Plan:MK, 2019). After the ONP formed part of development plan in July 2017, policy ONP13 identified the site for employment-led mixed use development within the Olney Town Neighbourhood Area (ONA) (Delegated Report of Ref. 17/03335/OUT; ONP, 2017). The development boundary was accordingly extended to include Site B, and the applicant was consequently able to progress the project. Afterwards, the site was re-defined as 'Employment - Proposed' area in the Milton Keynes Council (MKC)'s Policies Map 2019 (Milton Keynes Council (MKC)'s Policies Map 2019).

Prior to the submission of the application, the applicant engaged in the production of the ONP and provided representations to 'those public consultations which took place during the production of the document' (Planning Statement of Ref. 17/03335/OUT, p. 7). The developer stated that they consulted 'with members of Olney Town Council on numerous occasions to gain an understanding of their aspirations for the site and discuss the contribution' to the vision and objectives of the ONP (Planning Statement of Ref. 17/03335/OUT, p. 8). Accordingly, the Olney Town Council determined to support 'the principle of the application which is compliant with Policy ONP12 of the Olney Neighbourhood Plan' in their comment on the scheme (Olney Town Council's consultation responses of Ref. 17/03335/OUT, p. 8). The planning officer also stated that the scheme is appropriate for the site in terms of the ONP (Delegated Report of Ref. 17/03335/OUT). In consequence, the Outline Planning Permission (Ref. 17/03335/OUT) was granted through delegated decision in December 2018.

This case indicates that the neighbourhood development plan (NDP) was influential from the preparatory stages onwards, drawing developers' attention, since the plan was likely to have a considerable impact on the site once adopted. The developer had a close working relationship with OTC from the production of ONP and complied with specific requirement and policy of ONP, the application was able to be approved favourably and positively with support of OTC and without significant conflicts.

Site R of Policy ONP 13

Site R is the land at corner of Lavendon Road and Warrington Road Olney, and was designated for retail use by Policy ONP13 of ONP for 'a food store (Use Class A1) and possibly a petrol filling station' (See map – Figure 18 in Section 6.3.3) (ONP 2017, pp. 30-31). Applicants the proposed dwellings in the site. However, according to the report of the independent examiner of the ONP, the examiner states that the ONP 'already allocated sufficient housing land' and that 'if there is surplus land after the food store and petrol filling station have been built, ... another small retail unit could be located' within this Site R (John Slater Planning Ltd 2017, p. 17).

Before the ONP was made, a planning application (Ref. 14/02212/FUL) had been submitted

in September 2014 for a Food store (use class A1) and petrol filling station. Despite more than 80 per cent of the local people and the town council supporting the proposal, MKC had refused it, with the committee decision stating that the scheme was contrary to the Saved Local Plan and had an adverse impact on the open countryside and the non-retail part of Olney Town Centre (TC4; Murrer, 2019; Planning Statement of 14/02212/FUL; Decision Notice of 14/02212/FUL; Appellants Statement of Case 2020).

During the preparation of the ONP, a subsequent developer acquired the site (DEV1; Murrer, 2019). Since the site was not adopted yet, the applicant made representations about its proposed designation in the neighbourhood plan (DEV1). The developer recounted that the relevant policy for this site was included in the ONP but did not reflect their suggestions. This led to 'significant issues and conflict' throughout the decision-making process after the adoption of the ONP, as the developer described (DEV1).

The actual policy that ended up being adopted in the neighbourhood plan didn't reflect any of our representations. That is still leading to significant issues and conflict today because the allocation in Olney is not sound. It's not robust and most importantly, in planning, it's not deliverable. ... We consistently said to them during that plan process that the retail demand will only be for half that site so you should allocate the other half of the site for an alternative use. We were recommending residential development (DEV1).

After the ONP was produced in July 2017, outline application (Ref 17/03232/OUT) was submitted in December 2017 for a mixed-use development including the erection of a retail food store within use class A1 and 'up to 26 residential' units within use class C3 on the entire Site R. This was then withdrawn by the applicant in April 2018 (Planning Statement of 17/03232/OUT; Application Committee Report of 19/01484/FUL, pp. 1-2; Appellants Statement of Case 2020, p. 170). Around a month later, the developer amended the proposal (Ref. 18/01239/FUL) in May 2018 for a 'smaller' retail food store on the western side of Site R 'with no development' on the eastern part of the site (Application Committee Report of 19/01484/FUL, pp. 1-2; Appellants Statement of Case 2020, p. 170; TC2; TC3; TC4; see also Planning Statement of 18/01239/FUL). The east part of the site was proposed as 'Future Development Site' (Location Plan of 18/01239/FUL). The OTC commented that the council supported it but raised various concerns mainly including the lack of wider public consultation by the applicant prior to submitting the revised planning application and the design and layout (Consultation response of Olney Town Council, 2018; Minutes of the meeting of Olney Town Council, 2018). Two town councillors recalled that they were satisfied with it due to the fact

the proposal was for 'still for a good-sized retail store', but pointed out that the petrol station was not contained, contrary to the ONP (TC3; TC4). The scheme was granted under delegated powers in October 2018.

The eastern side, as the remainder of the Site R has since been the subject of two planning applications (DEV1; TC2; TC4). The first proposal (Ref 17/03232/OUT) contained 'pure residential housing' as a Use Class C3 private residential scheme, but it was 'about to be refused and was withdrawn by the applicant' (TC2; TC4). Subsequently, the following proposal (Ref. 19/01484/FUL) was submitted for the development of '48 Class C2 retirement living plus apartments and 10 Class C3 retirement living bungalows' in June 2019 (Development Control Committee 2020, p. 99; see also Planning Statement of 19/01484/FUL). It means that the application was changed from 'standard C3 Use Class residential properties' to 'primarily C2 Use Class retirement properties' and was supported with detailed evidence 'to demonstrate that there is no or very little demand for retail use' (Report of the planning officer of 19/01484/FUL).

The other half was initially the subject of a pure housing residential application. That was rejected. Then they came forward with the retirement development proposal. That too, as we sit here, has been rejected as well (TC2).

Prior to official submission of the application, the applicant held a pre-application meeting with the planning officer in January 2019 (Planning Statement 2019 of 19/01484/FUL; Statement of Community Involvement 2019 of 19/01484/FUL). Various meetings also took place with the ward councillor. Even when the ward councillors were absent, the applicant arranged 'a follow-up meeting' to update them on the scheme and to gain comments (Planning Statement of 19/01484/FUL, p. 10; Statement of Community Involvement of 19/01484/FUL, p. 21). Also, a presentation of the proposal was made to the OTC in February 2019; and a briefing session and public exhibition were held to introduce the project to the local people and gain additional feedback in March 2019 (Planning Statement of 19/01484/FUL; Statement of Community Involvement of 19/01484/FUL).

To underpin the scheme, the applicant attached a statement of Community Involvement and a Strategic Housing Study which included 'an analysis of older persons' housing demand and supply in Olney' (Report of the planning officer of 19/01484/FUL, p. 11). As the result of marketing the site, the applicant stated that there was interest 'from non-retail operators and

developers, but no interest from retailers' (Planning Statement of 19/01484/FUL, p. 10).

Despite these efforts at early engagement and the marketing evidence, OTC objected to the proposed scheme as it was contrary to the ONP and on the grounds that the site was not marketed fully enough to prospective retail users (TC1; TC2; TC3; TC4). One town councillor illustrated that the applicant submitted the marketing evidence which was independently assessed, but the consultants probably 'look at things slightly differently with less rose-tinted glasses' (TC4).

It's a shame that we couldn't have got a bit more retail to provide some jobs ... We don't know how much they marketed. ... They (Developers) then said, 'We've marketed it on retail, we can't get any retail so we want to build retirement houses.' They forced that through against our plan. ... It is difficult first to get proof that they've marketed it, and what kind of ways they've marketed it ... Some people are saying that they phoned up to ask for details, and they never received the details. (TC3).

Twenty local people raised concerns mainly around the suitability of the location for elderly residents, retail allocation, housing mix and design (Public responses of 19/01484/FUL; Report of the planning officer of 19/01484/FUL). In contrast, MKC had a different perspective. As for the local planning authority (LPA), the MKC's Housing Officers 'did not raise any objection to this type of housing provision'; and its Development Plans/Planning Policy Team presented that 'the provision of the 58 extra care units would significantly expand the provision of retirement properties in Olney where there has been little provision in over a decade' (Report of the planning officer of 19/01484/FUL, p. 11). Despite the conflict with a specific, site allocation policy in the ONP and the objection of the OTC, the planning officer recommended the proposal be approved due to the up-to-date and robust evidence in line with National Planning Policy Framework (NPPF) paragraph 31 (PO10; National Planning Policy Framework (NPPF), 2019; Report of the planning officer of 19/01484/FUL). The officer stated that Plan: MK 2019 as the local plan is the most recently adopted part of the development plan, greater weight should be attached to its policies than to those within the made ONP 2017 (Report of the planning officer of 19/01484/FUL).

Officers are, therefore, satisfied that there is not a demand for retail development at the application site. Given that the application site is located within the settlement boundary, resisting non-retail development in principle, due to the retail Site Allocation, would not be appropriate in this instance (Report of the planning officer of 19/01484/FUL, p. 10).

I'm not sure if it was in Plan:MK to say that you can't propose alternative uses for land if it's been robustly evidence that they're not needed for the purpose for which they've been

allocated. I think from our perspective we thought it has been that. The Council has obviously disagreed with us. (PO10).

In response to the objection of the town council, the planning officer regarded the marketing of the applicant as appropriate in terms of the period and methods (Report of the planning officer of 19/01484/FUL). In this regard, town councillors were unsatisfied with the assessment of the planning officer (TC2; TC3).

The planning officers in Milton Keynes Council seem to be happy to support it as a proposal. I'm sure majority of the town council, if not all, would be totally appalled by that attitude, really. (TC2).

The planning officer pointed out that 'There is no extra-care retirement housing provision in Olney with an unmet demand for over 100 units of specialist older person's housing arising from existing households resident in Olney Ward' (Report of the planning officer of 19/01484/FUL, p. 11). Moreover, the developer pointed out that 'there is currently no site allocated in the ONP to achieve it', whilst Olney is defined as a key settlement by MKC due to being 'a suitable location for development' as the planning officer stated and the ONP highlighted a need for downsizer housing as a key priority, in particular, for the elderly (ONP 2017, p. 22; Statement of Community Involvement of 19/01484/FUL, p. 31; Report of the planning officer of 19/01484/FUL, p. 11). The planning officer presented that 'the provision of retirement properties would need to be afforded significant weight as a material consideration in the determination of this application' (Report of the planning officer of 19/01484/FUL, p. 11). As the evidence submitted and reviewed revealed there is little need for further retail units within the proposed site under the reference 19/01484/FUL, the eastern part of the Site R of the ONP. In this regard, the officer indicated that the scheme 'is considered acceptable subject to compliance with policy HN3(B)' of Plan:MK (Report of the planning officer of 19/01484/FUL, p. 11).

However, in a further twist, the Development Control Committee then overturned the recommendation of the officer and refused the permission in November 2019, since the site was identified for only retail use in the ONP (TC2; TC3; TC4). One borough planner pointed out that 'the motivation to refuse the application centred upon the allocation of the site for retail use within the ONP' (Milton Keynes Council (MKC)'s Appeal Statement of Case of APP/Y0435/W/20/3247144).

During the meeting, three ward councillors argued:

To say the Neighbourhood Plan is out of date is a kick in the face of Olney. The Neighbourhood Plan is not yet invalid. Come back in two years' time because now is too soon (Tooley, 2019).

We have no evidence that this is desperately needed in Olney. I do not believe it is meeting a need. I'm a big fan of neighbourhood planning and I'm not prepared to kick them in the teeth. (Tooley, 2019).

great scheme but in the wrong place, at the wrong time (Tooley, 2019).

On the decision notice, 'only one reason' for refusing the application was stated that the application was contrary to policy ONP13 of the ONP. This clearly indicates that the ONP had a significant impact on the determination of the planning application. For this, the developer reasoned that their application has been assessed 'technically' by planning officers and 'politically' by the councillors of the committee:

The political side of planning almost overrules the technical side of planning. ... We now have a conflict between what is deliverable on that site and what the neighbourhood plan says which is why we're in conflict. We have a planning application ... which was recommended for approval again by the planning offices and technical offices. ... It went to the planning committee and it comes back again to the political side of things. The planning committee turned it down despite the recommendation from approval of planning offices. ... That doesn't stop the politicians, both at town council level and at Milton Keynes house level in this case, being completely and looking to support and back up their neighbourhood plan. ... The neighbourhood plan in our view, was fundamentally flawed because they've allocated a site on which 100% retail use is simply not deliverable. (DEV1)

The refusal was subsequently appealed (Ref. APP/Y0435/W/20/3247144), with a different planning officer in charge of the appeal for the LPA who was prepared to support the decision of the committee (PO10; MKC's Appeal Statement of Case of APP/Y0435/W/20/3247144). This clearly indicates that the ONP can be used in very different ways depending on the perception and discretion of actors. That is, the neighbourhood plan can have differently interaction with different actors which are hard to control.

Ultimately, the Councillor is the decision-maker in that situation. They lay heavily on the Olney Neighbourhood Plan and they ultimately refused it. ... I didn't even deal with the application. When it first came in, I was left to deal with the appeal and what I have to do is I had to fight. ... I was acting on behalf of the Councillors. Whilst I might not have necessarily agreed with their decision, I still had to back it. ... I wrote the statement went to appeal. I put forward the council statement of case to support, in an attempt to support the council's decision to dismiss the application, which as I said, that was contrary to the officer recommendations. The professional officer, my colleague, who no longer works here, but he recommended it for approval and that was overturned. ... I had to support the view of the Councillors because the Councillors, they made the decision. We're a cohesive entity, but they made the decisions (PO10).

Furthermore, the officer noted that the council paid careful attention to the position and stance of the ward and town councillors during the assessment of proposal (PO10). In this regard, the developer noted that town or parish councillors have significant influence from the perspective of planning officers (DEV1).

We didn't get any backlash from Councillors. The worst fear would have been for me to put something through and do a half-assed job and then they come back and they kick up a fuss and say, 'Well, you didn't defend our position well enough.' ... The reward at the end of that, if they don't dismiss the appeal, which would be a good thing for us, is that you don't get any councillors coming after you to say, 'Why didn't you do a better job?' We didn't get anybody doing that in that instance. The ward councillors in Olney, they know their stuff. They're not afraid to point out when you've done something wrong. That's absolutely fine. That's fine. They didn't do that in that instance. I considered that to be my reward. (PO10).

In June 2020, contrary to the decision of MKC, the appeal (Ref. 20/00018/REF) for the housing development on the west part of the Site R was allowed on the basis of 'the retail and commercial evidence' provided by the applicant (TC4; Appeal Decision of APP/Y0435/W/20/3247144). The appeal inspector disagreed with the town council's 'criticisms of the marketing exercise given its scope involving a broad range of outlets and media and the length of time', and added that the scope of marketing is 'evidenced by the range of initial interest received from retailers and/or petrol filling station operators' (Appeal Decision of APP/Y0435/W/20/3247144, p. 4). The inspector, in this regard, insisted that marketing was performed by the developer for a sufficient period of time, whilst the marketing evidence 'represents a relatively short time period' compared to the period of the ONP (Appeal Decision of APP/Y0435/W/20/3247144, p. 4).

Two elements in the appeal decision illustrate the effectiveness of ONP. On the one hand, 'up-to-date' material considerations overrode the provisions of the statutory development plan. The appeal inspector deemed that the applicant performed 'sufficient marketing of the application site to determine that there was no demand for retail development' and represented two main reasons with regard to material considerations including market evidence of no interest for retail development and the local demand for accommodation for the elderly (Appeal Decision of Ref. APP/Y0435/W/20/3247144). In this regard, the Inspector concluded that 'material considerations, such as the marketing evidence, weigh against adopted policy ONP13' (Appeal Decision of APP/Y0435/W/20/3247144, p. 6).

Furthermore, the changing structure of retail market was taken into account as a key factor

in the appeal decision. The developer pointed out that structural changes are taking place in the retail market (Planning Statement of 19/01484/FUL). In this respect, the appeal inspector stated that whilst the marketing evidence presented by the applicant provides a relatively short time period compared to the period of the ONP, 'it is consistent with the research on retail trends which has informed Plan:MK, and which point to a decline of 'in store' shopping' (Appeal Decision of APP/Y0435/W/20/3247144, pp. 3-4). In addition, the inspector assumed that 'it is unlikely that Olney will continue to be immune from these trends despite its planned growth in housing' (Appeal Decision of APP/Y0435/W/20/3247144, pp. 3-4). One town councillor did admit the changing circumstances of the retail market, particularly due to the coronavirus pandemic, compared with the period when the ONP was first conceived in 2015 (TC4).

On the other hand, time lag and policy precedence were another significant factor in the decision on the proposal. The proposed site was designated as 'Retail' on the Proposals maps of the ONP in 2017 and subsequently as 'Shopping and Leisure' on the Policies Map of the Milton Keynes in 2019 (ONP 2017, pp. 10-11; Adopted Policies Map Sheet 2 of Plan MK 2019; Planning Statement of 19/01484/FUL, p. 18; the MKC's Appeal Statement of Case of APP/Y0435/W/20/3247144, p. 20). The appeal inspector stated that the references to leisure use in the Policies Map with the Plan:MK 'indicate that leisure uses, involving the loss of retail opportunities may be acceptable to the Council in policy terms' (Appeal Decision of APP/Y0435/W/20/3247144, p. 3). In this respect, the inspector pointed out that the allocation of the site for both Shopping and Leisure 'shifts the weight away from retention of the site' only for retail development since Plan:MK is 'an up to date plan with policies which would take precedence over the ONP11' in the line with Planning and Compulsory Purchase Act 2004 sn 38(5) (Appeal Decision of APP/Y0435/W/20/3247144, p. 5).

The perceptions and attitudes of decision-makers play a substantial role in determination of appeal. As mentioned above about decision notice, the LPA refused the application with 'only one reason', stating the proposal was contrary to policy ONP13 of the ONP (Minute of the Development Control Committee of 19/01484/FUL; Decision Notice of reference 19/01484/FUL). However, the appeal inspector asserted that the single policy objection alone is 'insufficient reason for me to dismiss this appeal' in spite of the substantial weight 'which the Government places on neighbourhood planning' (Appeal Decision of

APP/Y0435/W/20/3247144, p. 6). In this respect, the inspector stated that ‘allowing the appeal counter to a single policy, would not undermine the integrity of the whole of the ONP’ and concluded that the material considerations including the marketing evidence weigh against the Policy ONP13 (Appeal Decision of APP/Y0435/W/20/3247144, p. 4; p. 6).

Overall, this case explores the impact and use of ‘a policy’ in the ONP. The ONP was used differently by actors from the production of the planning application to its determination and appeal. The effectiveness of the ONP significantly depended on the discretion, willingness, and attitude of the actors towards the plan and their power and authority within the hierarchical planning system in England. The work of the ONP is bounded by the frame set by central government, such as the NPPF and planning acts. Time-gaps caused conflict between relevant plans, since the latest policy and evidence have precedence over the early ones. This leads OTC to prepare revisions to ensure the ‘stable’ status and impact of ONP. Although the appeal was allowed contrary to the ONP, the policy was a principal subject throughout the process of the decision-making, providing a key topic for discussion. In this regard at least, one borough planner represented that the ONP was influential:

Obviously, that doesn't accord with what it was allocated for in the neighbourhood plan. In that instance, the neighbourhood plan was quite influential in the determination of the application because it allocated it for a purpose, and this application didn't record without purpose. We cited it as it was quite a considerable factor in how the application was determined (PO10).

Perceptions of the influence and work of the neighbourhood plan

NDP is beneficial in assisting local communities to be involved in decision-making according to both town councillors and planning officers (TC4; PO9). Town councillors felt that local residents in Olney Town were able to express their concerns and aspirations through various surveys, consultation events, and the referendum; and that their responses were used as the basis of policies within the ONP (TC1; TC3; TC4). These policies as guidance to stakeholders though their impact on decision-making is far from assured (TC4) and some residents may still feel that the ONP is complicit in bringing more sites than necessary in the town.

One town councillor maintained that the ONP encourages developers to deal with policies related to particular issues raised from communities (TC4). This implies that the plan provides

a framework for applicants including developers and landowners, as the specific wording of the site allocation policies assists them to produce proposals effectively in the line with policies of the NDP as an instruction (TC4). Furthermore, developers are normally aware that if they suggest a proposal on a site allocated within the NDP in accordance with particular policies and requirements in the plan, this provides them a level of certainty that their application will be considered favourably (TC4).

The NDP therefore encourages decision-makers to deal with the concern and interests of communities as articulated in the plan. One planning officer represented that this is a nature of NDPs, since the plan as a guidance has to ask readers and actors what they consider, what they address, and what they have to include (PO12). This in turn causes planning applications to be produced and assessed against the policies of the neighbourhood plan. Moreover, some NDPs refer to other documents like the Conservation Area Review to instigate readers and users to take them into consideration (PO12). For example, the ONP refers to 'the New Residential Development Design Guide (SPD)' which would be applied to assess all planning applications by Milton Keynes Council (ONP, 2017, p. 22).

Some of the neighbourhood plans refer to other documents to look at. For example, the Conservation Area review document, they tell you to research that. ... A neighbourhood plan has to ask everybody what they think and they have to include that as a collective process (PO12)

According to the quantitative data above, a small number of local residents have cited the ONP in their comments on planning applications. This indicates that communities rarely perceive and use the ONP as evidence and grounds of their statement. Applicants and consultees can also selectively use a NDP for their responses. One developer who has submitted applications in Olney stressed that applicants act on their own volition to present proposal in relation to NDPs (TC4). For example, a developer suggested housing development on the Site R which is already designated as 'only retail' on the ONP:

Any application has got to be justified on its own merits... It's up to us as developers and landowners to come forward with proposals and justify them on their merits... If it's not in accordance with the neighbourhood plan and/or the local plan, then clearly, it's up to us to make our case as to why it could be approved outside of that process through other material considerations (DEV1).

In this regard, town councillors felt that some developers apply creative interpretations to the ONP (TC2; TC3). This implies that applicants may attempt to present the policies of NDPs

in their own interest or deliberately disregard them. One councillor exemplified that a local developer proposed four and five-bed executive homes on back land behind two existing houses, although the ONP set out a residential mix policy in order to promote a range of home sizes (TC4). The councillor provided another extreme instance where the OTC was consulted on a controversial residential application in the town centre, since the agent of the applicant was apparently unaware of the ONP (TC4).

I think developers can be very creative people, and obviously constantly looking for a way to maybe steer the plan in a different direction or get an appeal decision that gets around the plan, if you like (TC2).

Conversely, however, a developer carefully noted that applications can be objected to by local people, even though the proposals are fully in accordance with policies in NDPs (DEV1). The developer added that 'people still have their views outside of the neighbourhood plan', whereas they have a NDP (DEV1). In this circumstance, the applicants would be in a predicament, if they completely rely on and refer to the plan to understand the concerns and interest of local people for the production of the proposal. This again raises difficult questions around the representativeness of NDPs:

You could have something that is allocated in a neighbourhood plan but you could still have overwhelming amount of objections to a planning application, even if that planning application is in accordance with the neighbourhood plan. The neighbourhood plan is not the end of the process by any stretch. There is still plenty of areas for conflict because of that, people still have their views outside of the neighbourhood plan (DEV1).

As one applicant noted, some people may have voted in favour of the neighbourhood plan but may still (or later) disagree with part of the plan (DEV1). In other words, the assent to the NDP does not mean that supporters are wholly satisfied with all policies of the plan (DEV1). For example, although local people aimed to protect their settlement boundary and prevent it from significant growth and development outside of the boundary of the neighbourhood area, there may be controversies due to specific locations and site allocations for development (DEV1). Thus, it is necessary to be cautious in evaluating planning applications 'only' on the basis of the support or objections of local people in relation to their NDP (DEV1).

Development is controversial. It doesn't necessarily mean to say it's going to get well supported, but just because it's not well supported doesn't mean to say it's bad development (DEV1).

Furthermore, Olney Town Councillors felt some planning officers interpret the ONP

differently from the town council, (TC2; TC3). For their part, planning officers responded that officers generally interpret applications in 'the same light', although sometimes they attach discretionary weight to 'whatever' they think if there is a conflict or different meaning of policies between a local plan and a NDP (PO12):

Sometimes you just need to put the wording of the policy in the neighbourhood plan, alongside our Local Plan, and then you just read it together because it means something. However, sometimes there's a conflict and it doesn't mean the same thing, and then we have to put some weight to whatever we think (PO12).

Interpretation of neighbourhood plans is complex but the room for misinterpretation is limited since the contents of potential controversies within the NDP are largely 'corrected at examination stage' before adoption (PO12), with the LPA asking those involved in the production of the NDP in order to ensure 'clarity' where there are potential conflicts regarding interpretation and understanding of the NDP (PO12). In particular, the planner revealed that if people including town and parish councillors do not agree with the interpretation of planning officers, 'they will generally voice that very publicly' (PO12).

Most town councillors believed the members of the Development Control Committee at MKC have been mostly supportive of the ONP (TC2; TC3; TC4). However, one developer felt that NDPs are politically protected by town and ward councillors (DEV1), elucidating that councillors at a parish or town council are incredibly protective of NDPs which may have 'flaws' and in turn they affect the perception and attitude of the planning committee (DEV1). This implies that ongoing work post-adoption by neighbourhood planning groups is powerful in ensuring the effectiveness of NDPs. In this sense, the developer claimed that the committee is significantly political and normally attaches more weight to NDPs than other planning policies, whilst planning officers technically consider not only the NDP but also a local plan and National Planning Policy Framework (NPPF) to review applications (DEV1).

At a political level, they (neighbourhood plans) are extremely hard-fought and extremely well protected by the parish council or the relevant town council because it's their plan. It's been through a referendum. Therefore, it must be defended at all costs even if the plan itself may have some flaws in it. It may not be necessarily consistent with the local plan, it may not be consistent with the National Planning Policy. There is a bit of a siege mentality sometimes with a parish council or town council about protecting that neighbourhood plan (DEV1).

The political influence in the planning system. What we find is that where you have a neighbourhood plan, generally speaking, the relevant parish or town council are far more engaged in planning. They try and influence it more and they certainly politically lobby their

ward councillors, or district or borough level, who are obviously the planning authority for the purposes of determining planning application (DEV1).

In that context, one town councillor highlighted that the OTC keeps working to remind other actors to use the ONP and to communicate its intentions, since it is open to interpretation (TC3):

I think you've got to hold the local authority to account.... I think it's important for residents and Town Councils if they have a neighbourhood plan for them to make it clear. If there's a conflict, they need to make that clear and apparent to the local planning authority whilst this is something that planning officer should be taking into account when they're making a decision. If local communities want more, want to feel like they're contributing more, they should emphasise that point. They should emphasise whether or not it accords with the plan and with that in the plan (PO10).

For this, one planning officer suggested the significance of clear comments on planning applications to indicate whether the proposal is in compliance with the NDP, since local people and a parish/town council need to bring the attention of the decision-makers to specific policies in the NDP (PO10). This implicitly indicates that OTC has important ongoing roles in the implementation of ONP. The following section identifies the role post-adoption of OTC and its neighbourhood plan steering group and interaction between their activities and the work and impact of the ONP.

6.3.6 Role of the Neighbourhood Plan Steering Group post-approval

The preceding sections indicate that Olney Town Council (OTC) is continuously involved in the performance of Olney Town Neighbourhood Plan (ONP) in various ways. This section identifies the status and role of OTC and its Olney Neighbourhood Plan Steering Group (NPSG) as a neighbourhood plan steering group after the adoption of ONP in order to understand their activities for the implementation of ONP. The Olney Neighbourhood Plan Steering Group (NPSG) was disbanded post plan-making, and the members of the group 're-integrated back into the Planning Committee of Olney Town Council' (OTC) (TC3; TC4). According to the section on 'implementation and monitoring' within the ONP, the OTC is the main actor in the implementation phase to 'review, decide and implement actions to realise as far as is possible all the objectives of the policies' through an Annual Town Council Meeting, a detailed report of progress, and review of the plan every five years, the plan does not suggest further roles

or status of community after the adoption of the plan (ONP, 2017, p. 37). It seems that the local people in Olney Town were only temporarily engaged in the production of ONP, even those who participated in the production of ONP as members of the Neighbourhood Steering Group. However, the OTC later recognised that they needed leadership and engagement in the implementation phase of ONP and the steering group was therefore reconstituted out of the Planning Committee of the Town Council into the Olney Development Group (TC1; TC2; TC3; TC4). That is, the development group was established to take over the Neighbourhood Plan Steering Group (TC4). The Planning Committee of Olney Town Council still exists separately to look at 'each application and measure it against the strands that are in the neighbourhood plan' (TC2; TC4).

The Development Group became a separate committee of Olney Town Council and is composed of approximately ten town Councillors and up to five representatives of the local community (TC4). A town councillor recounted that the group had appointed no representatives of community at the time of the interview, but sought to comprise local people on the development group in particular for revision of the plan and management of Section 106 funding (TC2; TC3; TC4). The group mainly monitor the implementation stage and prepare the revision of the ONP, since 'the neighbourhood plan has to be revised and updated on a periodical basis' (TC1; TC3).

Engagement in management of the Section 106 monies is one of the key tasks for the Olney Development Group (TC3; TC4). Section 106 funding can be seen as 'a big bonus' which neighbourhood development plans (NDPs) provide, since the plans contribute financial benefits 'as a pipeline of money' from housing projects which have been allocated in the NDP (TC4; PO12). In other words, as another councillor added, developments yield significant sums of money, and part of it returns to the town 'for public benefit' (TC1). It should be noted that such a pipeline of money generally is used for community projects, as several town councillors pointed out (TC1; TC3; TC4). For instance, the new medical health centre and doctor's surgery was identified as a priority project, as discussed in the section 6.3.3. The development group have been liaising with the GPs at the surgery, the local NHS clinical commissioning group and the members of the community to move forward with that project (TC4). Since these contributions to the benefit of the town are handled by Milton Keynes Council (MKC), the development group works and negotiates with the local planning authority (LPA) 'to see how

that Section 106 monies are going to be spent within the town' (TC1; TC3).

Alongside the Development Group, the OTC works as a consultee to make sure that the ONP is recognised and used in the determination of planning schemes. Since the town council is not the statutory planning authority, they attempt to get involved in decision-making by commenting on proposals depending whether the council supports or objects them. Nevertheless, several town councillors felt that the LPA sometimes disagrees with the OTC (TC1; TC2; TC3). The town council also is keen to meet developers in order to encourage them to make sure that proposals abide by the ONP. One councillor suggested that most developers do contact and discuss their schemes with the town council since the statutory ONP was adopted (TC1). In contrast with the OTC, local communities have limited opportunity to be involved in the implementation of ONP through submitting public consultation responses on proposals or participating in public sessions of committee of Olney Town or the LPA (TC2; PO10).

Relationship and its effectiveness

The relationship with other actors was seen to have a positive effect on the determination of planning applications (TC1; TC2). Town councillors illustrated that they also attempt to build a close relationship with developers in order to ensure that they abide by the ONP and consequently meet the objectives and aspirations of local people (TC1; TC2; TC3; TC4). For this, one councillor exemplified that if developers propose schemes which comply with the ONP and the OTC agrees with them, the applicants could avoid potential conflicts and their applications would be positively assessed (TC1). In contrast to the statements of the OTC, one borough planner pointed out that the relationship can be helpful but was not really a determinative factor for planning permission (PO10).

Locally-based development companies were seen to have certain advantages, since normally most of them are aware of the characteristics of the area and already have experience working with the OTC and LPA (TC4). For example, one local development firm is located in the town, and therefore has knowledge of circumstances and conditions in the area. This developer submitted an outline application (reference 16/00688/OUT) before the adoption of the ONP. The proposed site is located to South of Lavendon Road Farm, Lavendon Road in Olney and was subsequently defined as Site A through Policy ONP3. The applicant consulted

twice with the Olney Town Neighbourhood Plan Steering Group 'to discuss the site and its potential for residential development' (Planning Statement of Ref. 16/00688/OUT). The developer also referred to the Draft Site Allocations Plan which identified the site for up to 60 dwellings. After Outline Planning Permission was granted for residential development up to 50 dwellings in 2016, the ONP was adopted in 2017 and allocated the proposed it for circa 50 dwellings (Planning Statement of Ref. 16/00688/OUT). In 2019, a reserved matters application was also permitted (Design and Access Statement of Ref. 19/01345/REM). In contrast, town councillors felt developers outside of Olney Town need more time and effort to build a relationship, for example, Site R as discussed in section 6.3.5, since they usually have insufficient local networks and less knowledge of the distinctive features of the area (TC4).

The OTC is keen to engage with planning officers, in particular, when planning applications have been submitted within the neighbourhood area, as one town council illustrated (TC4). Notably, each officer of MKC is in charge of contact with a town or parish council respectively (PO10). However, the main challenge of the OTC is to build a stable relationship with planning officers since they frequently change or leave their position (TC2; TC3; PO10). Nevertheless, several town councillors felt that planning officers are generally supportive but do not always agree with the OTC (TC1; TC2; TC3; PO10).

From a planning officer perspective, we have a buddy system. Each officer will be allocated a certain number of Town or Parish Councils for which they will be the main point of contact in the development management department of Milton Keynes. There were certain Town Councils that I liaise with directly. ... We're having to constantly rearrange things because people are leaving. That's one way is that we still have to keep a dialogue with them. The other one's just things through general consultation on planning (PO10).

Sadly, they [Milton Keynes Council] don't always agree with us. We would like to think that they would, but that's not always the case (TC1).

The planning officers in Milton Keynes Council seem to be happy to support it as a proposal. I'm sure majority of the town council, if not all, would be totally appalled by that attitude, really. ... I certainly think anyway that they don't give due weight to the neighbourhood plan very often (TC2).

The OTC has been more satisfied with the Planning Committee (formerly known as Development Control Committee) at MKC, since members of the Committee have normally been supportive of and favourable to the ONP, as one town councillor described (TC2). In particular, the council illustrated that it is beneficial to Olney that the OTC is on good terms

with the planning committee which has a substantial authority to determine planning applications and can over turn the recommendations of planning officers on occasion (TC2).

The OTC has a direct relationship with the LPA through a Ward Councillor who is also one of the Town Councillors (TC4). For this, however, one developer noted that the Committee is influenced by the town and parish councils ‘politically’ since town councillors are likely to lobby their ward councillors on the determination of proposals (DEV1).

What we find is that where you have a neighbourhood plan, generally speaking, the relevant parish or town council are far more engaged in planning. They try and influence it more and they certainly politically lobby their ward councillors, or district or borough level, who are obviously the planning authority for the purposes of determining planning application (DEV1).

After the adoption of ONP, the OTC keeps working to ensure that the neighbourhood plan is taken into account in the implementation stages. – monitoring subsequent development plans, revising the ONP, working to influence the use of the plan and the engagement in the funding which is generated by the ONP. Furthermore, the OTC seeks to persuade those who are involved in decision-making on planning applications within the neighbourhood area by sustaining relationships with them (however varied these are in practice). Thus, the ONP constantly interacts with those who made the plan post-adoption beyond the plan-making phase.

6.4 Newport Pagnell Neighbourhood Plan

6.4.1 Background and motivations

Newport Pagnell is a town and civil parish in the Borough of Milton Keynes, Buckinghamshire and is located in the north-eastern part of the Milton Keynes urban area (see map – Figure 17). The town is the largest of the three Key Settlements in Milton Keynes alongside Olney and Woburn Sands (Plan:MK, 2019; NPNP, 2021). The population of Newport Pagnell had increased dramatically from 6,000 in 1971 to 15,020 in 2001, and then slightly to 15,118 in 2011. One town councillor pointed out that unplanned development had resulted in the growth of population without sufficient benefits to the local area such as affordable housing and schools, while Newport Pagnell had not had appropriate and locally-specific planning

policies for the town (TC9).

What happened was that the developers got on in Newport Pagnell doing their own thing, changing a town from in the 1960s around 5,000 people, as I'd say 5-6,000 up to twice that. By the time we got into the 1980s or the 1990s the population doubled. ... That development happened without any of the benefits that were going on for the development in Milton Keynes, like community houses and schools were a terrible problem in Newport Pagnell for some time and so on and so forth (TC9).

We had been constantly fighting against this development, fighting to make sure that that development produced the necessary road or other infrastructure that was needed. The tenant had a really bad time. We were worried about the future of the town right next to Milton Keynes as it was but with many of the well-organised planning constraints on Milton Keynes area not applying to Newport Pagnell (TC9).

Newport Pagnell Town Council (NPTC) was keen to retain the existing condition of the area, but Milton Keynes Council (MKC) allocated new dwellings to rural areas including Newport Pagnell and Olney through the 2013 Core Strategy (NPNP, 2016). Local people and the NPTC raised concerns about infrastructure which would be adversely affected by extra housing (TC8; NPNP, 2016). The NPTC stated that, regardless of the preference of Newport Pagnell, the town was unable to block additional housing allocated by the local planning authority (LPA) and recalled that Newport Pagnell had to accommodate additional dwellings to help meet the housing target of the MKC (NPNP, 2021). Hence, Newport Pagnell undertook to manage circumstances 'in the best way possible for the town' through their own neighbourhood plan, rather than by resisting development. (NPNP, 2016, p. 3).

We don't want any new homes in Newport Pagnell ... we like it just as it is. That may be the case, but the Milton Keynes Council Core Strategy places a demand on us to have new homes, whether we like it or not. ... As the largest key settlement in the rural area Newport Pagnell will have to accommodate new housing development to help meet this target. This neighbourhood plan presents an opportunity for the required growth to take place in a way that is supported by the community. (NPNP, 2016, pp. 4-5).

Notably, contrary to most areas where adopted neighbourhood development plans (NDPs) exist, the NPTC employed a different approach to Newport Pagnell Neighbourhood Plan (NPNP) by allocating more housing than the requirement of the Core Strategy in order to secure benefits to the town and local people through planning obligations (PO9; PO12; TC8; TC9). The following section scrutinises that why and how the NPNP was produced to address such issues in detail and what challenges the town faced in the preparation of the NPNP.

6.4.2 Preparation and adoption of the neighbourhood plan

Early in 2013, Newport Pagnell Town Council (NPTC) decided to produce a neighbourhood development plan (NDP) on behalf of local people (NPNP, 2016). Milton Keynes Council (MKC) approved the application from NPTC to be a designated body to prepare Newport Pagnell Neighbourhood Plan (NPNP) in October 2013 (Planning Resource, 2016a). The NPTC initially faced the challenge that they had insufficient planning skills and experience to produce a neighbourhood plan (TC8). As one town councillor described, the NPTC initially assumed that the town council could efficiently create a NDP with less modifications, if they have planning knowledge and capacity (TC8). Hence, the town council endeavoured to find the 'right people' and accordingly enlisted one planning expert in the Neighbourhood Plan Steering Group (NPSG):

Having the right people in place at the beginning makes all the difference. It really does. ... If you don't, then, yes, you can make a neighbourhood plan, then you probably find it would have to go back and be changed, and be changed, and be changed. You need some experts there. You need people who know what they're talking about (TC8).

The NPSG consisted of a mixture of six or seven town councillors and two co-opted residents (TC8; TC9). One local person was an ex-planner of the MKC and had been active in engaging with neighbourhood planning, while the other co-opted person rarely participated (TC9). The retired planner had substantial expertise of planning, particularly at local and national levels, and therefore advised on the overall framework and details on the establishment of policies and site allocations for NPNP (TC8; TC9; Planning Resource, 2016d). With this practical support, the steering group was efficiently able to produce the NPNP, as one town councillor expressed (TC8). Furthermore, two town councillors frequently highlighted that the town clerk had relevant experience and was also helpful in the preparation phase (TC8; TC9).

The Neighbourhood Plan Steering Group held two public consultations in December 2013 and September 2014, conducted three surveys and held two open question events in January and February 2016 in order to collect the concerns and priorities of local people and to discuss potential policies for the draft NPNP which was produced on the basis of the responses of residents (TC8; TC9; NPNP, 2016). Despite a number of public consultation events, there were 'a few' opponents, since their land was either included or not included (TC8; TC9). This highlights the challenges of keeping everyone happy in preparing plans.

There's always a small number of people ... who don't want anything to happen. ... One recognises that that's somewhat of a position that you can't win. Then there were a few, of course, who were interested in it from their own private reasons because these two pieces of land, for example, that we didn't want developed, are both in the ownership of local people. They have a few friends, but not many. ... There were a very few who were sticking out for something completely different. (TC9).

Notably, one town councillor illustrated that neighbourhood planning is 'a town council job but with constant consultation available to those members of the public who wanted to be involved' (TC9). The whole town council was 'behind the idea of neighbourhood planning' and supported it by participating in relevant events to answer questions raised by local people (TC9), while the NPSG led the preparation of the plan. According to the response of the town councillor below, although the Steering Group had been regarded as a main body to write and establish the plan, the group needed to report to the full town council in order for approval at the key stages.

All of the town councillors played a certain amount of part in the process, first of all, of course, in the decision to create a neighbourhood plan and then to revise it, and also in the process of making it, they played most of them, played a significant part. ... There's a group that did the majority of the work in actually writing it and revising it and all that kind of stuff, very much helped by this planner that I mentioned before. ... Then of course the whole thing had to come back to the full council for approval, and there was some discussion at that stage about should we do this? Should we do that? At the end, it was the council's neighbourhood plan agreed by all members. (TC9).

Housing target number

Housing allocation was the most significant challenge which NPTC faced during the preparation of NPNP. The MKC had earmarked 450 new houses for Newport Pagnell through MKC's Core Strategy 2013, whilst Newport Pagnell had been keen to conserve its existing character (TC8; Planning Resource, 2016b; Gardiner, 2018; Planning Resource, 2018). As one planning officer and the NPTC illustrated, however, the town was unable to evade the allocated housing to be built and agreed that they had to accept it (PO12; NPNP, 2016). Similar to most neighbourhood areas, local residents and the NPTC raised concerns mainly about the capacity of infrastructure or local facilities which would be adversely affected by extra dwellings (NPNP, 2016). The NPTC realised that if the town allocated sites in line with the requirement of the Core Strategy or adopted an incremental development approach, there would be inadequate benefit to the town (NPNP, 2016), since such approaches are unlikely

to result in S106 funding which can be used for the local area. In this regard, 'the district council advised them that infrastructure benefits would only be provided if the housing allocation was sufficiently high', as the clerk and one town councillor of Newport Pagnell recounted (Planning Resource, 2016d).

Limiting new housing to a development of this size will not lead to the appropriate levels of infrastructure required to support these new homes and be of benefit to the existing town. Infrastructure was a key concern of local residents. (NPNP, 2016, p. 22).

In order to ensure that we get a new primary school including a pre-school and healthcare facilities the Plan proposes more homes than are required by the Core Strategy. If we had limited the Plan to the Core Strategy numbers, it would severely impact on the infrastructure that could be provided and would place burdens on facilities that are already stretched. (NPNP, 2016, p. 4)

Newport Pagnell accordingly altered their attitude toward housing development by allocating much more housing than required by the Core Strategy 2013, (PO9; PO12; TC8; TC9). In this sense, the NPNP was regarded a rather unique case by planning officers (PO9; PO12).

To be specific, the first version of NPNP in 2016 identified sites for 1,400 new dwellings which was three times the 450 dwellings allocated for Newport Pagnell by the LPA and more than double the 613 dwellings specified for the rural north, including Olney. The aim was to develop and improve infrastructure such as schools a healthy facility through the S106 funding which is generated by development (PO9; PO12; TC8; NPNP, 2016; NPNP, 2021; Planning Resource, 2016b; Gardiner, 2018; Planning Resource, 2018; Locality, no date). In this sense, one planning officer suggested Section 106 funding was 'a big bonus' for neighbourhood plans (PO12). The main challenge was persuading local people 'to accept the much higher housing target', as the town clerk pointed out (Planning Resource, 2016d; Gardiner, 2018). Notwithstanding, one town councillor described that 'once the plan's propositions were explained, concerns about the higher housing target "melted away"' (Planning Resource, 2016d). There were, however, a range of wider impacts, including to the preparation of Olney Town Neighbourhood Plan as discussed above (Olney Town Neighbourhood Plan, 2017; TC1; TC3; NPNP, 2021).

It can also be, in the case of Newport Pagnell, it's their wish. It's what they want. It's the direction they want development to go. They realised they couldn't fight on housing but they've managed to get it where they want it. They've managed to the neighbourhood plan to bring in more money. They put in things about financial contribution through Section 106 Money for the payments they have by developers. ... They're able to direct the funds to the

areas they want or recommend them. I would say that's a big bonus for the Neighbourhood Plan. It's about housing protection. As I said, that thing about directing the funds, it's only really possible if you allocate an awful lot of amount. In their situation, that would be impeccable. (PO12).

The MKC approved the NPNP on 8 June 2016. Notably, despite the inflated housing allocation, the NPNP was endorsed by 84.7 per cent of local people with a turn-out of 34.4 per cent in a referendum on 5 May 2016, receiving 3335 votes in favour with only 602 voting against (Planning Resource, 2016b; Planning Resource, 2016c; Planning Resource, 2016d; Wilding, 2016; Planning Resource, 2018; Dewar, 2019b; Locality, no date). At that time, the NPNP received the highest number of votes, 'according to data compiled for Planning's Neighbourhood Watch bulletin' in May 2016 (Planning Resource, 2016b). This implies that local people were significantly interested in their NPNP regardless of whether they supported or objected, and therefore that the NPNP achieved a relatively high degree of representativeness comparing to other NDPs.

Moreover, the NPNP was viewed favourably by the examiner and various planning organisations due to the size of the housing allocation. Indeed, the NPTC received the top Editor's Award in the Planning Awards in June 2016 and the Award for Neighbourhood Planning presented at the high-profile Planning Awards event (Donnelly, 2016; Wilding, 2016; the National Association of Local Councils, 2016):

I conclude that the plan has been positively prepared, plans for sustainable development and exceeds the development plan target for new homes in the plan area. I congratulate the Town Council on taking such a bold and positive approach to their planning for housing growth and accommodating sustainable development (Parmiter, 2016, p. 11).

We actually did receive an award from the Royal Town Planning Institute. Yes, I'm as convinced now as I was then that the neighbourhood plan is the right thing to do, even if it means you have to keep revisiting and reissuing it. (TC8).

In this regard, one town councillor described that Government seemed to be satisfied with the NPNP. The following section illustrates that how key policies of the NPNP were designed to deal with distinctive local issues.

6.4.3 Overview of content and aims of the neighbourhood plan

The Neighbourhood Plan Steering Group (NPSG) enumerated what they achieved through the

first version of NPNP, including: site allocations for housing development until 2031, efforts to protect other sites from development, and the assurance ‘that new development were/will be supported by the necessary infrastructure’ (NPNP, 2021, p. 7). Newport Pagnell Town Council (NPTC) and NPSG undertook to revise the existing NPNP in 2019, and the modified NPNP was adopted in 2021, aiming ‘to ensure the continued deliverability of the plan and to improve its clarity for more effective implementation.’ (Table 9) (Final Modification Proposal Statement, 2020, p. 7). The group evaluated and revised all of the eight existing policies from the first NPNP 2016 (Final Modification Proposal Statement, 2020).

Table 9. Changing policies of Newport Pagnell Neighbourhood Plan

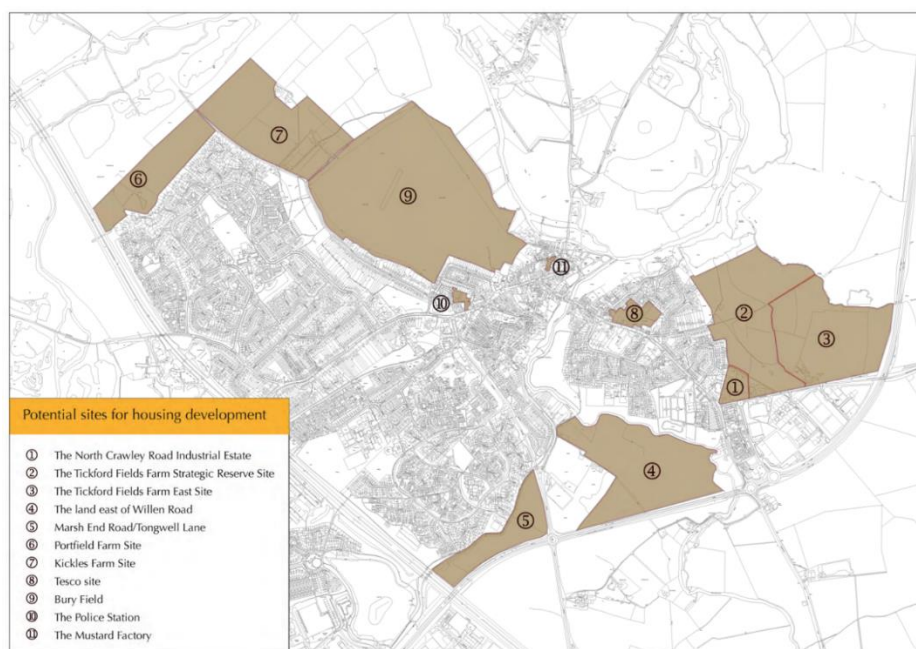
Policies	NPNP 2016	NPNP modified 2021
NP1	Preferred sites for housing development	Settlement Boundary and New Housing
NP2	Tickford Fields Development Site Specific Policies	Tickford Fields Development Site Specific Policy
NP3	Tesco (former Aston Martin Works) Site Specific Policies	Former Aston Martin Works Site Specific Policy
NP4	Windfall Sites	Design Guidance
NP5	Affordable housing and tenure	Affordable housing and tenure
NP6	Cycle and pedestrian Routes	Cycle and Pedestrian Routes
NP7	Developer Contribution Policy	Developer Contribution Policy
NP8	Playing Fields and associated development	Linear Park including Leisure

The modified NPNP made no significant or substantial changes beyond some very minor alterations and without any further allocation of new development sites (PO12; TC8; TC9; Final Modification Proposal Statement, 2020; NPNP, 2021). The existing plan was revised in two broad ways: to reflect the changed context for development and to adjust existing policies to fit updated national and local planning policies and improve the clarity of the text and meaning of existing policies (Final Modification Proposal Statement, 2020; NPNP, 2021). The original version of NPSG allocated six sites for housing development in Policy NP1, while two of them had been already specified in the MKC’s Core Strategy 2013 ‘to absorb this housing target’ (NPNP, 2016, p. 5; NPNP, 2021, p. 7; p. 19). In the second NPNP 2021, the steering group deleted two of the six allocated sites, reflecting the housing supply provisions ‘in respect of completions, commitments and allocations’ (Final Modification Proposal Statement, 2020, p. 5; p. 7; NPNP, 2021, p. 7; p. 19; p. 33). The following sections outline the key policies are and how they were later ‘improved’.

Pro-development policies

NPNP is a substantively pro-development plan. Six of all of eight policies are closely related to housing development including Policies NP1 (Settlement Boundary and New Housing), NP2 (Tickford Fields Development Site Specific Policy), NP3 (Former Aston Martin Works Site Specific Policy), NP4 (Design Guidance which was Windfall Sites in the first NPNP), NP5 (Affordable housing and tenure) and NP7 (Developer Contribution Policy).

Figure 24 Map of the site allocation of Newport Pagnell Neighbourhood Plan 2016



(NPNP, 2016, p. 6)

Policies of the NPNP therefore mainly deal with housing allocations and its implications. The NPTC and NPSG decided that the town would be adversely affected, if the NPNP set out land to meet the minimum figure required by the MKC which they felt would have resulted in insufficient funding through planning obligations (NPNP, 2016; NPNP, 2021). The NPNP therefore identified developable sites for more housing (Policies NP1, NP2 and NP3) than the number of dwellings identified in the MKC's Core Strategy 2013 in order to gain sufficient funding from developer contributions (Policy NP7) (PO9; PO12; NPNP, 2016; NPNP, 2021; Wilding, 2016; Locality, no date). In this regard, the NPTC and NPSG hoped that key issues raised by local people such as schools and GP surgeries would be addressed (NPNP, 2016; TC8; TC9).

The steering group scrutinised sites where development has already taken place or was in progress (NPNP, 2021). Nevertheless, the NPNP 2016 initially identified land for 1,400 units in the first version of the plan in 2016, while the figure was reduced to 1,163 when the plan was revised with the loss of 270 as a result of a flood risk assessment on the Tickford Field site at the planning application stage (Final Modification Proposal Statement, 2020; NPNP, 2021; Locality, no date). However, even this reduced figure was still in excess of the requirement of the Core Strategy 2013.

Identified sites occupy most of the housing figures which were allocated in the NPNP, accounting for 1,280 out of the 1,400 housing target in the first NPNP, whilst the number was reduced to 930 dwellings in the modification due to the potential flooding issue (TC8; Planning Resource, 2016d; Planning Resource, 2018; Final Modification Proposal Statement, 2020; NPNP, 2016; NPNP, 2021). Notably, the NPSG set out Policy NP2 for the development of Tickford Fields Farm sites which are located on the eastern edge of Newport Pagnell. The sites comprise three parts: North Crawley Road Industrial Estate (A), Tickford Fields Farm Strategic Reserve Site (B) and Tickford Fields Farm East (C); and were planned as one comprehensive development (NPNP, 2016; NPNP, 2021). The Strategic Reserve Site (B) was owned by MKC (TC9; NPNP, 2016). In the period of the modification, the North Crawley Industrial Estate (A) has already been implemented (Final Modification Proposal Statement, 2020). A planning application for both sites (B) and (C) for Outline planning permission has been granted and is discussed later in this chapter (see Section 6.4.5).

As larger scale housing development would generate more money for social benefits through Section 106 to provide and enhance the infrastructure and provision of schools and health facilities, the NPNP set forth that the Tickford Fields Farm sites would have their own functioning community with adequate infrastructure and facilities such as transport, bus links, schools, open space, recreation facility, a health centre, a local park and community facilities (NPNP, 2016; TC8; TC9).

We took a somewhat wider view. Because of that, we developed this plan, which I say, it's around 900 houses. There's also going to be some recreation stuff there. There's going to be facilities built there, community facilities. This is actually important for the town. (TC8).

Whereas we said, one of the conditions of our going for this would be we would get the primary school specifically for that area, and that we would also get a reasonable amount of public open space in that area, and then a whole load of other facilities as well, as well as

controlling how it fitted into the road system of Newport Pagnell, and in the cyclic cycles track system in Newport Pagnell, and all of those things. (TC9).

In this context, borough planners seemed to be satisfied, since the stance of the NPNP with regard to the provision of housing coincided with the orientation of the local planning authority (LPA) which has sought the urban extension of the borough (PO9). Along with national awards and recognition, this illustrates that local and national planning organisations seem to be in favour of the more pro-growth approach rather than a defensive attitude NP.

Clarification of policies

As the NPTC and NPSG have been in operation for five-years, they were able to reflect on which policies were weak and needed to be improved and how they could more effectively achieve aspirations and practically deal with concerns and priorities through the NPNP (NPNP, 2021). Policy NP4 was modified from Windfall to Design in the NPNP 2021 'to clarify requirements on future development' (Final Modification Proposal Statement, 2020; NPNP, 2021, p. 7; PO12). The Policy NP4 was retitled from Windfall Sites to Design Guidance and its content was clarified and revised 'in order to be more precise and add more value', since this policy had been 'imprecise and added no effective value to the generic design policies of the Local Plan' and 'varying interpretations of it had been made by different organisations', as the steering group stated (Final Modification Proposal Statement, 2020, pp. 4-5; NPNP, 2021, p. 7; PO12). The modified policy aimed to be more tailored, reflecting locally-specific planning issues and priorities (Final Modification Proposal Statement, 2020; NPNP, 2021). A relevant case is discussed below in Section 6.4.5.

The main change in that was to get rid of ... the infill policy, they wanted to take that out because it wasn't working. (PO12).

All of these modifications are intended to improve the effectiveness and clarity of the policy in its scope and implementation in the future. They are considered material in the sense that they 'unpack' the previous generic policy wording to apply more specifically to different parts of the town. (Final Modification Proposal Statement, 2020, p. 6).

The revised policy was supported by a Newport Pagnell Design Study 2020 which the town council commissioned for the evidence base to complement the 2010 Conservation Area Review and to be more precise and add more value (Final Modification Proposal Statement, 2020; NPNP, 2021):

Proposals located in the Newport Pagnell Conservation Area or its setting should demonstrate

that they have understood and responded to the character analysis and design guidance contained in the 2010 Newport Pagnell Conservation Area Review and in the 2020 Newport Pagnell Design Study, as relevant to their nature and location. (NPNP, 2021, pp. 41-42).

It aims to ensure both documents operate as design guidance to inform and determine planning applications (Final Modification Proposal Statement, 2020; NPNP, 2021). In this respect, one planning officer suggested that this requirement was fairly unique and added that planning officers do now have to look at NP4 along with the further documents specified in the policy (PO12):

There's a recent one, Newport Pagnell, their design policy and told you to have regards to Conservation Area review, and also a design guide they produced. They have a type of neighbourhood plan that I find quite different because they tell you to refer to it. ... They've created a new design which we have to take into account, which has had an impact amount of work recently because it references it, the heritage assets and things which weren't previously in there. We have to look at ... design character review as well too (PO12).

According to the quantitative analysis later in Section 6.4.5, borough planners did refer to the documents in the assessment of planning applications more than others. (see more: References. 21/03247/FUL; 22/00316/FUL; 21/03017/FUL; 21/03247/FUL; 21/01691/FUL; 22/00248/FUL; 21/01905/FUL; 22/00300/FUL; 21/01571/FUL; 22/00218/FUL; 22/00131/FUL). This illustrates how specific policies rooted in robust evidence can be more influential in decision-making.

This policy has been subject to more change than others though. The NPTC and NPSG stated that 'the modifications are material, but they do not significantly or substantially change the nature of the plan'.

The Windfall Policy requires more definition in order to ensure developments that take place under this policy are sympathetic to the town's history and to existing architecture. (NPNP, 2021, p. 19).

It is considered that, as a result, the modifications are material, but they do not significantly or substantially change the nature of the plan, either on their own or in combination (Final Modification Proposal Statement, 2020, p. 6).

In addition, one line regarding Clause A of Policy NP4 has been added to the revised NPNP 2021 in consequence of the result of determination of a planning application (TC9). As will be discussed in detail in section 6.4.5, one developer communicated with the NPTC to understand and reflect the priorities and requirements of the NPNP, since major developments are required to provide a certain level of affordable housing. However,

afterwards, the applicant divided the site and consequently each portion fell below the level required to contribute to affordable housing. Hence, the NPTC amended the existing phrase to be more solid. Although the revision of the neighbourhood plan is slow to reflect such changes, this illustrates how the NPNP has interacted with decisions by identifying weaknesses or gaps in the existing neighbourhood plan and improving relevant policies to prevent loopholes being exploited:

This was one of the cases in the neighbourhood plan where we weren't very clever because we put in the bit about ... All the things that we told them, we expected, were in accordance with the neighbourhood plan and they agreed all of them, and what did they do? They divided it into two separate developments, each of which was below the threshold for any affordable housing. ... One of the small changes that we made in modifications of the plan was that it was not allowed to break down a small area into something that was smaller, again, so that won't happen again. Again, it was an example where the Milton Keynes planners could have stopped that easily but they didn't spot it. (TC9).

Further modifications to maintain influence

The NPSG also reflected updated higher-level policies and clarified the existing policies of the NPNP 2016. The modified NPNP adjusted Policies NP5, NP6 (Cycle and Pedestrian Routes), and NP8 (Playing Fields and associated development in NPNP 2016 to Linear Park including Leisure in NPNP 2021) in accordance with the changes of national and local planning policies in order 'to ensure they are consistent and remain up to date to aid their successful implementation' (Final Modification Proposal Statement, 2020, p. 7; NPNP, 2021, p. 7).

In addition, the steering group clarified the text and meaning of other policies (NP3, NP5, and NP7) by retitling or rephrasing and redefining them in order to make it 'easier to understand', to deliver precisely the original intention of the NPNP to readers and actors, and to reduce conflicts which may result from misinterpretation and misunderstanding. Such modifications show the NPSG learning from experience to develop clear and precise policies. The next section explores how the NPNP and its provisions have actually been used during the process of decision-making.

6.4.4 Interaction with the Local Plan

Newport Pagnell Neighbourhood Plan (NPNP) was produced in 2016 on the basis of Core

Strategy (2013) of Milton Keynes Council (MKC). Plan:MK 2016 – 2031 (Plan:MK) replaced the Core Strategy and formed part of MKC's Development Plan in 2019. The revised NPNP was then approved in June 2021 and has precedence over the local plan in the determination of planning applications since then. This illustrates how what one town councillor called the “balance of power” has changed over the time (TC9).

As for the production of the local plan, one town councillor at Newport Pagnell felt that the MKC rarely took the NPNP into account in the emerging local plan, although the local planning authority (LPA) ‘would look at’ the NPNP and ‘would incorporate the basic ideas from’ the NPNP into the local plan (TC9). Nevertheless, Newport Pagnell Town Council (NPTC) assumed that the existing NPNP 2016 accordingly needed to be updated in accordance with the changed local plan in order to restore its precedence in the determination of planning applications (TC9). In this regard, the date of the production was clearly regarded as a key factor affecting the effectiveness of neighbourhood development plans (NDPs) in decision-making.

When Milton Keynes was producing a local plan ... At the point that we were making the neighbourhood plan, there wasn't a local plan. There was a local plan in place already and it couldn't affect that. Then when they started making their next local plan, we began to feel they don't actually care what's in the neighbourhood plan at all. They're just going to go ahead and do what they want to do. ... We'll then have to modify our neighbourhood plan accordingly. (TC9).

However, another town councillor had a different perspective, suggesting there was no significant conflict over the production of the local plan, since the borough consulted and each town or parish council had opportunities to comment on the draft of the local plan regardless of whether the councils had a neighbourhood plan or not (TC8). This councillor noted that the neighbourhood plan was helpful to state views of the town and negotiate with the LPA:

Bear in mind, we are part of the borough of Milton Keynes. We and every other part of the borough have opportunities to comment on what is going to go into that Local Plan. Consultation is very, very important. ... ‘This is no good. You cannot have this in your local plan.’ We've made some comments, we've suggested changes here and there, but nothing really ... Even before the days of neighbourhood plan, you still had to do the consultation around all parts of your borough. ... Consultation of the Local Plan is not dependent on that making a neighbourhood plan. ... It [a neighbourhood plan] helps, because you've got your policies there. If anything, it should make it easier for the primary authorities to say, ‘Right, that is now part of our planning policy.’ ... You need to speak to Planning Officers to decide that. (TC8).

MKC has tended to identify areas themselves rather than mentioning specific NDPs in the Core strategy 2013 and Plan:MK 2019. Moreover, there was no significant modification regarding the status of Newport Pagnell as one of three Key Settlements in its settlement hierarchy between the existing and emerging local plans, (Final Modification Proposal Statement, 2020; Milton Keynes Council (MKC)'s Core Strategy 2013; Plan:MK, 2019; NPNP, 2021). When it comes to the retail hierarchy, the town centre of Newport Pagnell as a third-tier centre was merely renamed as a district centre in Plan:MK in accordance with National Planning Policy Framework (NPPF) (Plan:MK, 2019).

In terms of the housing allocation, the NPNP 2016 had to accept and identify sites to meet the requirement in the Core Strategy 2013. In this sense, one town councillor predictably noted that the neighbourhood plan is limited by the need to comply with the local plan (TC7). This statement intimates that the neighbourhood working group may have at times regarded the local plan as a barrier and challenge to the production of the NPNP. However, the town council stated that Policy DS2 (housing strategy) of Plan:MK 2019 took into account the site allocations in the first version of NPNP 2016 and required no additional allocations, since the NPNP 2016 already set out more dwellings required by the Core Strategy 2013 (NPNP, 2021). It is worth noting that while MKC allocated additional new housing for each rural area in the Core Strategy 2013 from the top-down, towns and parishes including Newport Pagnell have since been empowered to identify sites at their own discretion through neighbourhood plans (Milton Keynes Council (MKC)'s Site Allocations Plan, 2018).

Originally, the Core Strategy proposed that the Site Allocations Plan would also release development sites in the rural area. However, since the adoption of the Core Strategy, this role has largely been fulfilled by the introduction of neighbourhood plans. The settlements of Newport Pagnell and Olney alone are providing 1700 homes through their respective neighbourhood plans and all the other key settlements and selected villages in the rural area are also making strong progress in identifying their own preferred sites for development. (Milton Keynes Council (MKC)'s Site Allocations Plan of Core Strategy 2013, no date, p. 3; MKC's Site Allocations Plan, 2018, p. 3).

The following section demonstrates how the NPNP as part of development has been practically used during the decision-making process.

6.4.5 Role of the neighbourhood development plan in decision-making

This section comprises two parts to scrutinise the work and use of Newport Pagnell Neighbourhood Plan (NPNP) in decision-making on the basis of quantitative and qualitative data respectively. The first part analyses the extent to which the Newport Pagnell Neighbourhood Plan (NPNP) and its policies have been used by actors at each key stage during the decision-making process. The objects of investigation once again are 'decided' planning applications and their relevant documents including applications, consultation responses, public responses, reports of planning officers, minutes of the Development Control Committee, decision notices and appeal decisions. The level of references describes the degree to which the NPNP and its policies have been widely used throughout the processes of decision-making. The analysis also reveals how the effectiveness of the NPNP has been different or similar in the whole of Newport Pagnell Neighbourhood Area (NPNA) and on the allocated sites respectively. The following part scrutinises how the NPNP has been used by actors, focusing on particular case study planning applications. This identifies why the NPNP and its provisions are used; how actors use and interpret them; the extent which the NPNP is influential in the production and assessment of planning applications; and what roles Newport Pagnell Town Council (NPTC) has adopted in order to ensure that the NPNP is effectively considered and used at key stages during the process of decision-making.

1) Quantitative overview

260 decided applications between 2016 until 2022 in the Newport Pagnell Neighbourhood Area (NPNA) and their relevant documents were investigated, including 6 proposals within the allocated sites. A variety of actors have been involved in decision-making, including Newport Pagnell Town Council (NPTC), applicants, statutory consultees, public consultees, planning officers, councillors of the Planning Committee (formerly known as Development Control Committee), and appeal inspectors.

During the investigation period, 27 out of 233 planning applications contained relevant statements including planning statements or design and access statements as a short report accompanying and supporting the planning application. In this context, five (18.52%) out of 27 planning applications cited the NPNP in the whole of the NPNA, three (75.00%) of four applications did so within the allocated sites. In all key stages of decision-making, the plan has

been taken into account within the allocated sites more than in the whole of the NPNA, as can be seen in Table 10. That is according to the number of citations, the NPNP is more influential due to site allocation policies, since the tailored spatial policies are generally established with specific requirements and priorities for particular sites.

Local people referred the NPNP in 6 (10.34%) of submitted comments. As one town councillor recalled, even though they had perceived the existence of the NPNP they had never read it before being a councillor – suggesting the likelihood that many residents would remain unaware of the NP (TC7):

I'm aware of it but I've never really read it (Newport Pagnell Neighbourhood Plan) to see what's in there and the totality of the content. I'm aware of it but when you're aware of something, but you're not interested in because it wasn't affecting me and it wasn't something that I was going to be involved in (TC7).

The quantitative data (Table 10) backs up this statement, displaying low levels of references to the NPNP within the comments of local residents. This may raise questions in terms of the effectiveness of NPNP. Notably, the NPTC who led the production of NPNP has commented on 179 (68.85%) of schemes but cited the NPNP in 'only' nine (5.03%) of them, despite emphasising the importance of consultation responses on proposals (see Section 6.4.6).

In addition, the NPNP has been referred to in 188 (73.15%) out of 257 reports of planning officers at Milton Keynes Council. It is notable that the borough planners have stated that a proposed site is within the area covered by the NPNP but that there are no policies relevant to the application in 52 (20.23%) of 257 reports. One planning officer even considered the NPNP as supplementary planning guidance. This implies that the NPNP has been taken into account by planning officers but that the practical reach of the NPNP has limited in assessment of schemes in general.

In terms of the citation of policies during the processes of decision-making, only two Policies NP1 (retitled from Preferred sites for housing development in NPNP 2016 to Settlement Boundary and New Housing in NPNP 2021) and NP4 (changed from Windfall Sites to Design Guidance) were cited more than 10% and 60% respectively. It is worth noting that the rest of the policies were used less than 5% of the time, while all policies have been taken into consideration more than once. Overall, the policies of the NPNP have been cited in only 99 of all relevant documents throughout the whole process of decision-making on all 260 proposals.

This indicates that a small number of policies in the NPNP have been intensively used by actors, although the NPTC and local people invested a lot of time and effort to identify and set forth policies in order to deal with locally-specific planning issues within the NPNA. Assessment of the degree of broad use of the NPNP and its policies should, however, be considered with regard to the aspirations and intentions of local people. As discussed in 6.4.4, the chief aim of the NPNP was to promote a range of large-scale developments in few particular sites and in turn to improve infrastructure and local facilities through the Section 106 funding. As a result, it is perhaps unsurprising that the NPNP have been quite narrowly used.

Table 10 Citation of Newport Pagnell Neighbourhood Plan in decision-making

Documents	In the whole neighbourhood area Total 260 decided applications				Within allocated sites Total 6 decided applications			
	Figure of submitted documents	% of the submission	Figure of citation	% of the citation of the NP**	Figure of submitted documents	% of the submission	Figure of citation	% of the citation of the NP**
Statements of application	27	10.38%	5	18.52%	4	66.67%	3	75.00%
CR of the NPTC	179	68.85%	9	5.03%	6	100.00%	1	16.67%
PR of residents	58	22.31%	6	10.34%	3	50.00%	2	66.67%
CR of other formal consultees	74	28.46%	8	10.81%	4	66.67%	2	50.00%
Report of planning officer	257	98.85%	188	73.15%	6	100.00%	4	66.67%
Minute of the Development Control Committee	8	3.08%	3	37.50%	2	33.33%	1	50.00%
Decision Notice	260	100.00%	3	1.15%	6	100.00%	1	16.67%
Appeal Decision	5	1.92%	1	20.00%	0	-	0	-

* CR: Consultation response, PR: Public response, NPTC: Newport Pagnell Town Council

** % of the citation = a number of citations of the neighbourhood plan / a number of the submitted documents × 100

Figure 25 Citation of Newport Pagnell Neighbourhood Plan in decision-making

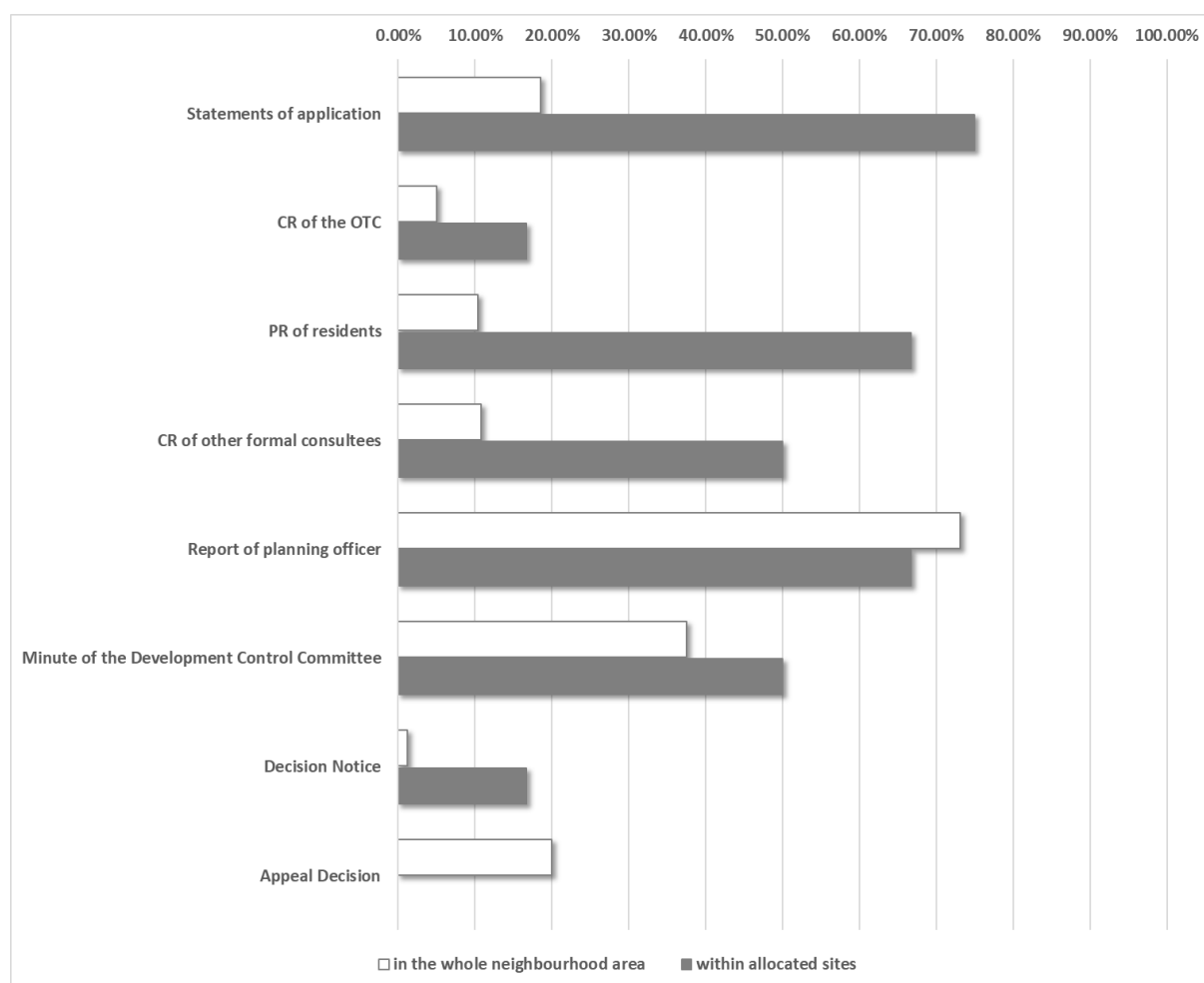
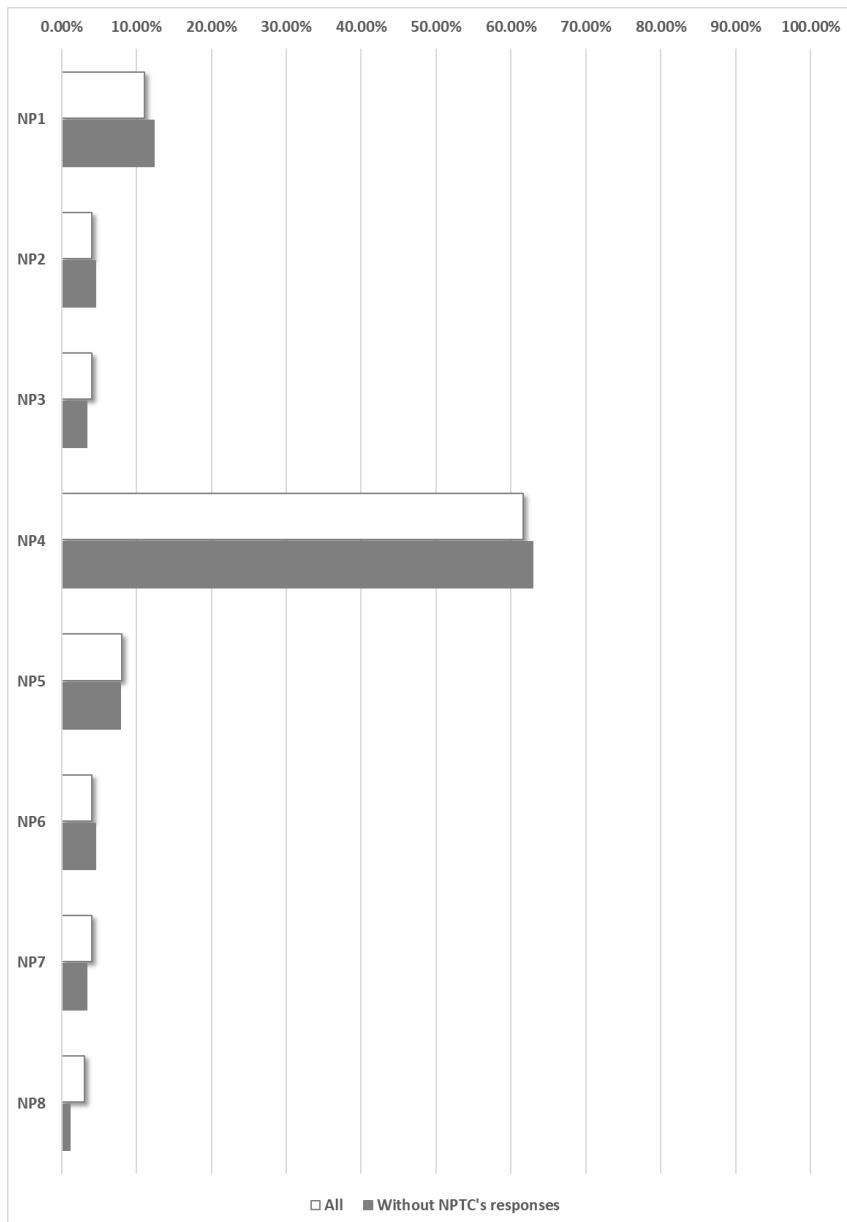


Table 11. Citation of policies of Newport Pagnell Neighbourhood Plan in decision-making

Policies of Newport Pagnell Neighbourhood Plan			Figure of citation on documents for 260 applications		Without NPTC's responses	
2016	2021	Policy				
Preferred sites for housing development	Settlement Boundary and New Housing	NP1*	11	11.11%	11	12.36%
Tickford Fields Development Site Specific Policies	Tickford Fields Development Site Specific Policy	NP2*	4	4.04%	4	4.49%
Tesco (former Aston Martin Works) Site Specific Policies	Former Aston Martin Works Site Specific Policy	NP3*	4	4.04%	3	3.37%
Windfall Sites	Design Guidance	NP4	61	61.62%	56	62.92%
Affordable housing and tenure	Affordable housing and tenure	NP5	8	8.08%	7	7.87%
Cycle and pedestrian Routes	Cycle and Pedestrian Routes	NP6	4	4.04%	4	4.49%
Developer Contribution Policy	Developer Contribution Policy	NP7	4	4.04%	3	3.37%
Playing Fields and associated development	Linear Park including Leisure	NP8	3	3.03%	1	1.12%
Total			99	100.00%	89	100.00%

* Policies related to the site allocation

Figure 26 Citation of policies of Newport Pagnell Neighbourhood Plan in decision-making



2) Case study applications

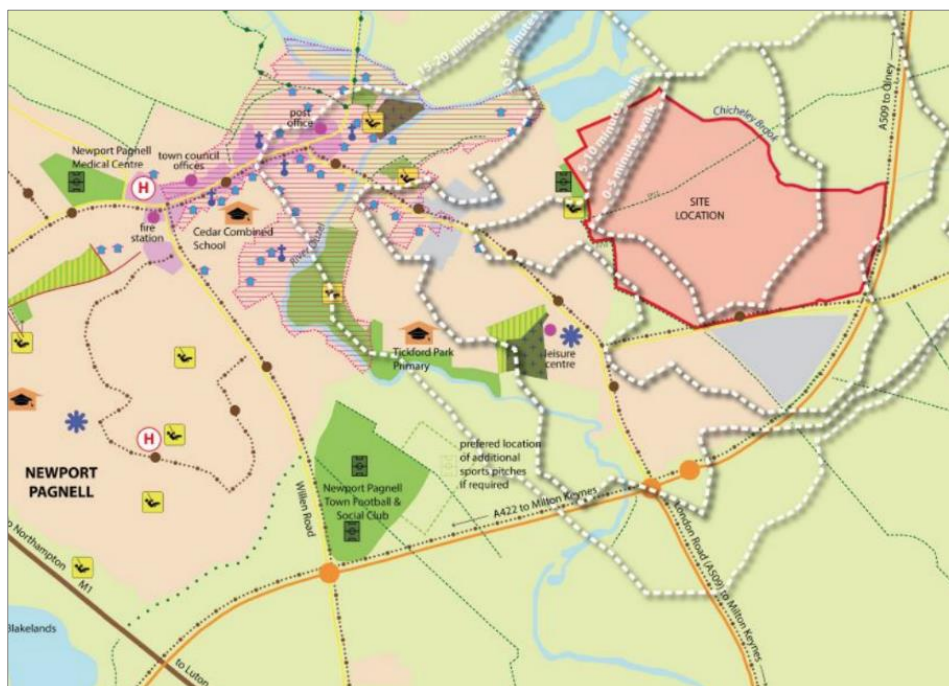
This second part seeks to identify the work of Newport Pagnell Neighbourhood Plan (NPNP) and the activities of Newport Pagnell Town Council (NPTC) during decision-making in practice and their impact on subsequent development, focusing on what elements are influential in the performance and effectiveness of the NPNP under different contexts. This section accordingly tracks the whole process of decision-making on selected cases to scrutinise the extent to which policies of the NPNP have been taken into account; how actors at key stages perceive and use the NPNP in the production and assessment of the proposals; and how the NPTC seek to achieve the aspirations and objectives of local people.

20/00133/OUTEIS on the allocated site under Policy NP2 of NPNP 2016

The first case is related to the site designated for the development set out in Policy NP2 (Tickford Fields Development Site Specific Policies) of the NPNP 2016. This scheme was submitted for the 45.17hectare site requiring the demolition of existing farm buildings on site and the development of up to 930 dwellings including affordable dwellings with primary school, local centre, open space, sports pitches, play areas, pavilion/wellbeing centre and other associated works in January 2020 (Ref. 20/00133/OUTEIS). When it comes to the scope of debate for the assessment, this proposal sought ‘outline planning permission and access; therefore, the principle of development and the access are for consideration. Layout, scale, appearance and landscaping are reserved matters, to be submitted for later approval if outline permission is granted.’ (Report of planning officer of Ref. 20/00133/OUTEIS, p. 4).

The proposed site (Ref. 20/00133/OUTEIS) is located on Tickford Fields Farm North Crawley Road to the east of the centre of Newport Pagnell and is within the Newport Pagnell Neighbourhood Area (NPNA). Milton Keynes Council (MKC) owns the site and the Milton Keynes Development Partnership (MKDP) which is a Limited Liability Partnership (LLP) was the developer.

Figure 27 Map of planning application (20/00133/OUTEIS)



(Planning statement of 20/00133/OUTEIS, p. 9)

The NPNP 2016 initially set Policies NP1 (Preferred sites for housing development) and NP2 for the development of around 1,280 homes on Tickford Fields Farm land which comprises the three sites including a) North Crawley Road Industrial Estate, b) Tickford Fields Farm Strategic Reserve Site and c) Tickford Fields Farm East. The sites were planned to be one cohesive development and relevant principles were outlined in the development brief attached to the NPNP at Appendix 2 (The Development Brief for the principal site – The Tickford Fields Development) (NPNP, 2016). The North Crawley Road Industrial Estate, now the Tickford Mews residential estate, was permitted in August 2016 and has already been developed for 73 dwelling units with associated car parking and new access from North Crawley Road (Ref. 14/02799/FUL). The proposal of Ref. 20/00133/OUTEIS related to sites b) and c) for 930 housing. Plan:MK 2019 as the local plan of Milton Keynes, which was then more recent than the NPNP, had already identified the sites for 930 dwellings in Appendix A (Housing Sites) of Policy DS2 (Plan:MK, 2019).

The key principles and requirements of this proposed site were set out in Policy NP2 with clauses a) to p) and in the Development Brief attached to the NPNP at Appendix 2. The applicant referred to Policies NP1, NP2, NP5 (Affordable Housing and Tenure) and NP6 (Cycle and Pedestrian Routes) of the NPNP 2016 and the planning officer assessed the proposal against the same policies. The applicant set a table to explain how the scheme responds to all requirements that the development is expected to meet under Policy NP2. Moreover, the applicant highlighted that numerous liaisons have taken place and ‘will continue to take place’ with landowners, the local planning authority (LPA), NPTC, statutory and non-statutory consultees and other stakeholders. (Planning Statement of Ref. 20/00133/OUTEIS).

As shown on the indicative masterplan for the site, the application seeks to secure all of the main uses required under the policies of the NPNP ... The indicative masterplan has been subject to ongoing engagement with both the LPA and Town Council with respect to the policies of the NPNP (Planning Statement of Ref. 20/00133/OUTEIS, p. 50).

We must have met, I suppose, about every two months over the whole period that it's been going on for two or three years. The Milton Keynes Council have been working on developing the plans. ... We've been meeting with them very regularly over that. We've had some big rows. (TC9).

In terms of affordable housing, the applicant had not specified in the outline application but stated that 31% affordable housing would be provided in line with Plan:MK 2019 (the NPNP 2016 also required 30%) (Plan:MK, 2019; Planning Statement of Ref. 20/00133/OUTEIS;

Report of planning officer of Ref. 20/00133/OUTEIS). The planning officer drew heavily on Plan:MK 2019 as the more up to date than the NPNP at the time of the determination. When it comes to affordable housing tenures as the housing split, Policy HN2 (Affordable Housing) of Plan:MK requires that 31% of homes should be affordable and of the total number of units, 25% should be at affordable rent levels and 6% as shared ownership (Plan:MK, 2019; Report of planning officer of Ref. 20/00133/OUTEIS). The NPNP 2016 suggest that 10% of all new affordable housing will be initially reserved for people with a strong local connection with Newport Pagnell and that the affordable housing required on any site will generally be 35% shared ownership and 65% affordable rented housing (NPNP, 2016). the planning officer pointed out that 'this does deviate from Plan:MK requirements in policy HN2, which requires a slightly higher rate of affordable ownership and lower rate of shared ownership' (Report of planning officer of Ref. 20/00133/OUTEIS) but added that 'in terms of affordable housing have been secured via the legal agreement and are considered acceptable by MKC Housing Officers and Newport Pagnell Town Council' (Report of planning officer of Ref. 20/00133/OUTEIS). This illustrates how specific policies in neighbourhood development plans (NDPs) are used within ongoing negotiations, requiring the sustained activity of neighbourhood planning groups to realise the original intentions of local communities.

In addition, the Policy NP2 requires non-residential uses including a local centre, health and wellbeing facility, sports facility and a site for a primary school. The borough planner stated that such requirements would be secured through the legal agreement 'in agreement with' the NPTC (Report of planning officer of Ref. 20/00133/OUTEIS, p. 24). This again implies that NPTC be continuously involved in the negotiation and the decision-making process in order to achieve the objectives set out in the NPNP, while the degree of acceptance may be adapted to changes in the wider situation such as planning policies and context. The NPTC, in this context, stated that they had held numerous meetings with the applicants and their agents over three and a half years and therefore had no further comments to add (Consultation response of Newport Pagnell Town Council (NPTC) of Ref. 20/00133/OUTEIS). The policies of NPNP can be therefore be seen as setting out the grounds for negotiation and the comments of NPTC in debate – rather than determining any outcomes. This consequently indicates that the relationship between relevant actors remains core to realising outcomes.

The determination of this application was referred to the Development Control Committee

due to its scale and granted subject to the Conditions in the Committee Report and the completion of a Memorandum of Understanding. Notably, financial contributions were addressed through the Memorandum of Understanding (MoU) rather than a Section 106 agreement, since the MKC 'could not enter into an agreement with itself as the majority shareholder' in Milton Keynes Development Partnership (MKDP) (Minute of the Development Control Committee of Ref. 20/00133/OUTEIS). The NPNP 2016 was used as grounds for the Conditions in the MoU.

This case describes how the NPNP and NPTC worked to affected subsequent development in implementation. The policies of the NPNP provided topics of debate and guidance to be taken into account through the process of decision-making, including shaping the planning application, consultation responses, the planning officer's report and the decision notice. The case also describes that the NPNP substantially contributed to the achievement of the objectives and aspiration of the local people through the site allocation and specific requirements under the relevant policies. Furthermore, the NPTC invested its time and effort to make sure that policies of the NPNP were considered and realised, by engaging in the production of the scheme and communicating with relevant actors about the developer contribution and legal agreements. In this regard, this case illustrated that a close working relationship between the developers and actors, particularly including the NPTC is like to lead to positive results, although it may not secure planning permission. This clearly implies that there is a need for ongoing engagement of neighbourhood planning groups post-planning in order to realise the objectives in NPNP.

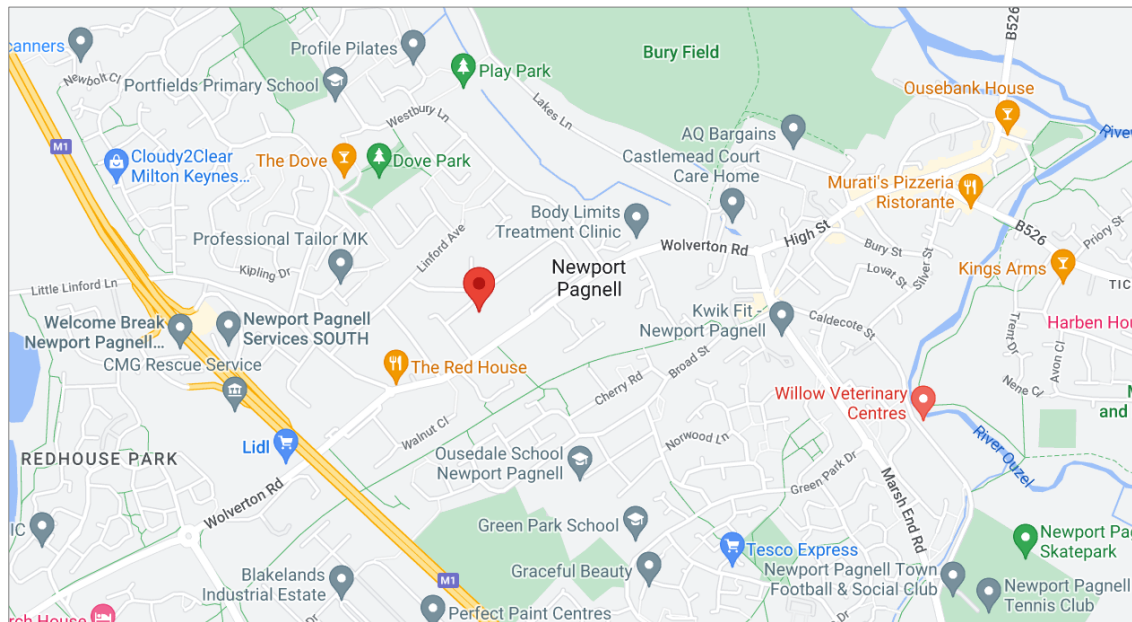
18/02617/FUL on 9 Shipley Road in Newport Pagnell

The second case (Ref. 18/02617/FUL) is related to a semi-detached residential dwelling on 9 Shipley Road in Newport Pagnell that is flanked by other residential dwellings and bordered by a garden to the rear of the house. The first planning application was submitted for the erection of a three bedroom residential dwelling in October 2018.

The planning officer described that the site is located within the Newport Pagnell Neighbourhood Area (NPNA) and the Policy NP4 (Windfall Sites) of the Newport Pagnell

Neighbourhood Plan (NPNP) 2016 is relevant to this application. However, the NPNP was unable to influence assessment of the proposal since, in line with Paragraph 11 and 14 of National Planning Policy Framework (NPPF) 2018, Milton Keynes Council (MKC) was unable at the time to describe a five-year housing land supply and the NPNP was more than two years old.

Figure 28 Map of a planning application (18/02617/FUL)



(Google map, screenshot, 20 April 2023)

To be specific, paragraph 11 of the NPPF 2018 outlines the presumption in favour of 'sustainable development' that covers decision-taking including where 'a Council cannot demonstrate that it provides a five year housing land supply' (NPPF, 2018, p. 6; Report of planning officer of Ref. 18/02617/FUL, paragraph. 7.0). As a result, the principle of the development was considered principally in the light of the policies in the NPPF 2018. This was evidence of the ways neighbourhood development plans (NDPs) interact with and are constrained by the wider planning framework.

The planning officer recommended this application for approval subject to conditions, assessing that the scheme would meet the definition of sustainable development (Report of planning officer of Ref. 18/02617/FUL, paragraph. 7.0). However, the proposal was refused under delegated powers for two reasons including the impact of the two-storey, detached design of the house on character of the area, and a lack of private amenity space associated with the size of garden (Decision Notice of Ref. 18/02617/FUL).

A few days after the decision on the previous application, on 16 January 2019, an amended scheme (Ref. 19/00111/FUL) was submitted, reducing the overall size of the dwelling and increasing the amount of rear amenity space. By the time of the determination of the second proposal, there was a change to the principle of development. It was deemed, by the Secretary of State through an appeal decision, that the MKC was now able to demonstrate a five year housing land supply (Report of planning officer of Ref. 19/00111/FUL, paragraph. 5.1).

As a result, the planning officer stated that the principle of the development must be assessed against the pertinent policies contained within the NPNP 2016. Policies NP1 (Preferred sites for housing development) and NP4 were related to this scheme. The site was not designated as one of the allocated sites for housing developments as set forth in Policy NP1, but windfall sites (NP4) were distinguished from the allocated housing sites. The officer, in this respect, illustrated that the NPNP 'implicitly recognises that infill developments may be approved subject to the criteria' under NP4 associated with heritage assets, character of the locality, and the amenity of neighbours (Report of planning officer of Ref. 19/00111/FUL, paragraph. 5.3).

Policy NP4: Windfall sites - Small, well designed residential developments on brownfield sites within the settlement boundary which do not have a detrimental effect on the surrounding area will be permitted. The impact of development will be determined based on protecting heritage assets and their setting, enhancing the character and appearance of the locality, and protecting the amenity of surrounding properties. (NPNP 2016, p. 43)

The planning officer recommend the proposal to be approved subject to conditions, assessing that the application addressed the previous reasons for refusal with regard to design, impact on character and appearance of the area. Perhaps surprisingly and contrary to their stance on the previous application, the NPTC objected to this scheme and requested that it be referred to the Development Control Committee for determination on the grounds of the proposal being detrimental to the character and appearance of the area. (Consultation response of Newport Pagnell Town Council (NPTC) of Ref. 19/00111/FUL; Report of planning officer of Ref. 19/00111/FUL, paragraph. 2.5). The town council then attended the meeting to discuss the issues. In response to these comments and objections, the applicant indicated that the scheme had been modified in consultation with planning officers and there were no objections from the neighbours or other local residents in the area.

The proposal was determined by the Development Control Committee of the MKC and was granted subject to conditions in March 2019. Members of the Committee stated that the NPNP was a significant consideration and carried full weight, but pointed out that it was 'a subjective view as to whether the proposal was in keeping with the character of the area'. In this regard, the Panel expressed 'some surprise' that the NPTC had not objected to the previous proposal which was a larger more impactful development and had been refused on delegated powers due to its size (Minute of the Development Control Committee of Ref. 19/00111/FUL). One town councillor described that this resulted from misinterpretation and miscommunication, as the intention and concept of the NPTC were inappropriately conveyed to decision-makers through both the policy of the NPNP and the comment of the NPTC.

We'd like these sites to be developed, but you will only get permission to develop them if you can show that you're doing something that the immediate neighbours are comfortable with. That was what we were trying to say. ... I don't think we said it strongly enough. We said if you develop ... a brownfield site, you need to think about what its effect will be on the neighbourhood, not, 'If you don't think and you don't get it right you won't get planning permission,' which is what we really wanted to say. That was probably an example. If we phrased it differently, it might have been less open to the wrong interpretation. (TC9).

This second case describes how the NPNP worked in practice and how the effectiveness of the NPNP interacted with a changing external environment and the shifting priorities of the NPTC. In this instance, the effectiveness of the NPNP varied with the status of the LPA and its planning policy as well as the age of the NPNP. The NPTC learned that the use of NPNP was limited due to the position of the LPA under Paragraphs 11 and 14 of NPPF. The town council consequently sought to revise the NPNP to ensure it would remain influential in decision-making regardless of the status of a five year housing land supply (NPNP, 2021).

So why is it now necessary to modify the plan? The last review of the National Planning Framework stated that where there is no 5-year land supply held by a principal authority, then effectively the Neighbourhood Plan becomes out of date two years after the referendum. It is always possible that at any time Milton Keynes Council may lose its 5-year housing land supply status. (NPNP, 2021, pp. 4-5).

The Steering Group was also mindful of the changing housing land supply position in the MKC area and of how this could lead to significant unplanned development proposals being granted planning permission if the weight of the relevant development plan is weakened. (NPNP, 2021, p. 7).

This case also identifies that policies with specific requirement and site allocation could still play a substantial role in the determination of the scheme under the paragraph 14 of NPPF, if they were directly related to the proposed site. The NPTC accordingly modified the Policy NP4

from 'Windfall Sites' to 'Design Guidance' in order to more effectively cover applications outside of the designated sites (NPNP, 2016; NPNP, 2021).

In addition, there were different interpretations of Policy NP4 between the NPTC and others, although the NPTC established the policy on the basis of an understanding of what it would mean. Within the hierarchy of the decision-making system, however, more weight attaches to the interpretation of powerful actors. In this regard, the original NPNP 2016 was later modified to try and clarify and enhance requirements associated with design under NP4 in order to avoid further 'misinterpretation' (NPNP, 2021).

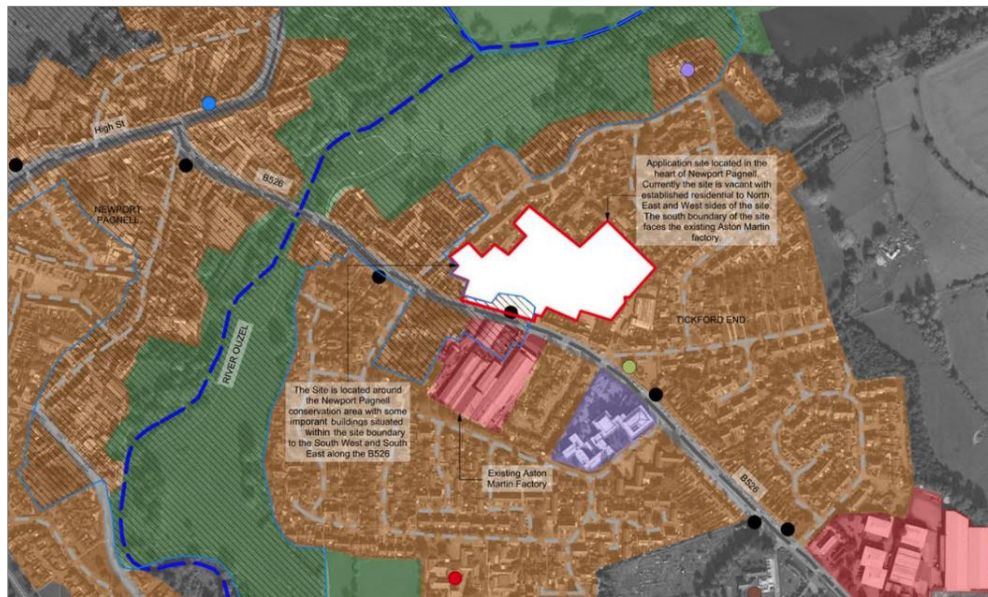
There was also a need to more clearly identify what Policy 4, the previous Windfall Policy meant, as varying interpretations of it had been made by different organisations. (NPNP, 2021, p. 7).

In this respect, the previous NPNP was revised in response to decisions. This suggests that the NPNP affected the determination of proposals but not always to the satisfaction of NPTC. The NPNP was also then affected by these determinations and the interpretations on which they were based. The decisions were therefore regarded as grounds for revision to fill gaps in the neighbourhood plan and to enhance policies to make them more effective in implementation.

16/00349/FUL (Former Aston Martin) on the allocated site under Policy NP3 of NPNP 2016

As for the third case, a planning application (Ref. 16/00349/FUL) was submitted to Milton Keynes Council (MKC) for 96 dwellings with a 78 space car park on 9 February 2016 before the NPNP 2016 was adopted. Newport Pagnell Town Council (NPTC) objected to the proposal for several reasons on 01 Apr 2016, some of which were related to the emerging Newport Pagnell Neighbourhood Plan (NPNP) including design, affordable housing, and planning obligations (Consultation of response of Newport Pagnell Town Council (NPTC) of Ref. 16/00349/FUL). Afterward, the developer amended and re-submitted a proposal for 86 residential dwellings and construction of a 72 space car park in August 2016. Since the previous submission, a number of discussions had taken place between planning officers at MKC, Ward Councillors and the NPTC resulting in the amendments to the original proposal, including a reduction in the number of proposed dwellings from 96 to 86 (Planning statement of Ref. 16/00349/FUL).

Figure 29 Map of a planning application (16/00349/FUL)



(Design & Access Statement of 16/00349/FUL, p. 4)

The application related to the Former Aston Martin Lagonda Site, Tickford Street, Newport Pagnell, situated 0.5 km from Newport Pagnell Town Centre and 9km from Milton Keynes. The site has a 100-metre frontage onto Tickford and is surrounded on three sides by housing. The site had been used for the production of cars by Aston Martin dating from 1954, but ‘has a long history of carriage making, coach building and vehicle production by Salmon and Sons’ since 1823’ (Report of planning officer of Ref. 16/00349/FUL, paragraph. 1.2). The production of cars at this site ceased in July 2007, but the servicing of cars continues on the site opposite. Afterward, a large multinational grocery and general merchandise retailer obtained full planning permission for a new retail store in October 2011, but the firm announced that it would not be developing a retail store and the site was sold in January 2015 (Ref. 10/01916/FUL; NPNP, 2016; Report of planning officer of Ref. 16/00349/FUL, paragraph. A1.1).

The site is located in Newport Pagnell Neighbourhood Area (NPNA) and is earmarked under Policy NP3 (Tesco (former Aston Martin Works) Site Specific Policies) of the NPNP 2016 which allocated it for a mixed development of housing and employment uses with retention of three historical buildings for employment or institutional use (NPNP, 2016; Planning statement of Ref. 16/00349/FUL). The NP3 of the original NPNP 2016 has since been changed to ‘Former Aston Martin Works Site Specific Policy’ in the modified NPNP 2021 (Newport Pagnell Neighbourhood Plan (NPNP), 2016; NPNP, 2021).

The planning application was produced on the basis of the National Planning Policy Framework (NPPF) 2012, saved Policies of the adopted Local Plan 2005, the Core Strategy 2013, and the NPNP 2016, though the policies of the local plan were expired at the time of the application (Planning statement of Ref. 16/00349/FUL). Notably, the NPNP was approved on 8 June 2016, in between the previous and revised applications. The first application took the draft NPNP into account but the scheme was modified in line with the adopted NPNP, especially Policies NP1 (Preferred sites for housing development), NP3, NP5 (Affordable housing and tenure), NP6 (Cycle and Pedestrian routes) and NP7 (Developer Contribution Policy) of the NPNP 2016 (Planning statement of Ref. 16/00349/FUL).

The applicant responded to the objections made by NPTC on the original proposal, and discussed the associated planning obligations with them, including affordable housing in accordance with NP5 of the NPNP 2016. Despite these reflections of NPNP in the modified proposal, NPTC commented that the new proposals had addressed most but not all of their objections and there remained a question mark against the reuse of the three historic buildings. The planning statement cited the relevant clause (NP3(b)) but there was no further mention how this requirement would be addressed. In this regard, the NPTC made a representation to the planning officer, 'emphasising the need to impose a planning condition to secure the restoration and reuse of the three historic buildings under the terms of the S106 Agreement, in exact accordance with the Newport Pagnell Neighbourhood Plan Policy NP3(b).' (Consultation of response of Newport Pagnell Town Council (NPTC) of Ref. 16/00349/FUL).

The planning officer explained how the comments of the NPTC on both the previous and modified applications were considered and addressed in their report on 17 November 2016 (Report of planning officer of Ref. 16/00349/FUL, paragraph. 5.51-5.28). The officer also took the same policies NP1, NP3, NP5, NP6 and NP7 into account and specifically detailed how each clause from a) to k) of Policy NP3 was addressed in the assessment of the proposal (Report of planning officer of Ref. 16/00349/FUL, paragraph. 5.8-5.16; NPNP). It is worth noting how the planning officer seemed to discuss and negotiate with the applicant regarding the agreement of requirements set out in Policy NP3, while the NPTC was involved in the discussion for the Section 106 agreement:

Part f) (of Policy NP3 of Newport Pagnell Neighbourhood Plan 2016) requires improvements to the pedestrian, cycle and bus links to the surrounding area and to the town centre. The

applicant has agreed to fund or provide a redway on the opposite side of Tickford Street towards the town centre. This will be controlled through the legal agreement. (Report of planning officer of Ref. 16/00349/FUL, paragraph. 5.12).

In terms of contributions towards the planning obligations package, the Town Council have been involved in discussions and it is felt that the scheme goes as far as it can to meet the requirements of the Neighbourhood Plan. (Report of planning officer of Ref. 16/00349/FUL, paragraph. 5.16).

This implies that the NPNP, through specific requirements in policies had a significant impact on the ways the proposal was assessed, and that NPTC actively worked to ensure the objectives of NPNP were realised as intended. Where priorities or requirements needed to be adapted, NPTC as a representative group was able to voice opinions for and on behalf of local people.

As to the principle of development, the proposal was assessed on the basis of presumption in favour of sustainable development in light of Paragraph 14 and 49 of NPPF 2012 at the time of assessment as MKC was unable to meet the requirement in respect of strategic housing land supply. In this regard, MKC considered the submitted application under the provisions of Paragraph 14 of the NPPF (Report of planning officer of Ref. 16/00349/FUL, paragraph. 5.1), accepting that the proposed development 'would contribute towards meeting the identified shortfall' (Report of planning officer of Ref. 16/00349/FUL, paragraph. 5.3; Planning statement of Ref. 16/00349/FUL, p. 33; p. 46; see also NPPF, 2012). It is noteworthy that at this time there was relatively little guidance on the scope of the neighbourhood plan in the NPPF 2012, compared with the NPPF 2018 in which Paragraph 14 addressed the range and application of the neighbourhood plan.

The applicant had asked for a deferral of determination of the proposal as they were unable to agree the S106 contributions. The application consequently was deferred from the Development Control Committee meeting on 6 October in order to allow further discussion and consideration of substantial matters in relation to planning obligations (Report of planning officer of Ref. 16/00349/FUL, paragraph. 1.1; Minute of the Development Control Committee of Ref. 16/00349/FUL, 2016a). The planning officer retained their recommendation to grant the application subject to a Section 106 agreement and the conditions which were produced in consultation with the NPTC, stating that this proposal would meet the definition of sustainable development as well as the requirements of the

NPNP (Report of planning officer of Ref. 16/00349/FUL, paragraph. 4.1).

At the meeting on 17 November 2016, the Development Control Committee stated the amended application had resolved the remaining matters regarding the design of the units and S106 agreement following negotiation with the NPTC (Minute of the Development Control Committee of Ref. 16/00349/FUL, 2016b). The planning permission was granted subject to the conditions and a Section 106 agreement requiring completion of restoration prior to 50% occupancy of the dwelling units as in policy NP3 of the NPNP and argued by the NPTC in their consultation response (Minute of the Development Control Committee of Ref. 16/00349/FUL, 2016b).

The third case illustrates the work of the NPNP and the roles of the NPTC and their influence in decision-making on designated sites. The NPNP provided guidance with specific criteria on the production and assessment of the planning application. In this regard, the specific requirements were key factors to convey the messages to the applicant and decision-makers, and helped them understand clearly the priorities and concerns of the local people. In addition, the NPNP established the substantial grounds of the negotiation in relation to planning obligations, by drawing the attention of actors and inducing them to invest the funding where the NPNP states. In addition, the NPTC played a key role here in the implementation of the NPNP, ensuring that the NPNP was fully taken into account and used in the determination. Hence, the town council kept monitoring in detail whether requirements under relevant policies were being considered or dismissed. Furthermore, the NPTC was involved in significant discussions and negotiations with the developer and the LPA in order to materialise the aspirations of local people within the NPNP. This further demonstrates that NPGs need to work continuously to ensure the effectiveness of NDPs in practice. The next section describes the ongoing work of Newport Pagnell Town Council following adoption of the neighbourhood plan.

Perceptions of the influence and work of Newport Pagnell Neighbourhood Plan

Overall, Newport Pagnell Neighbourhood Plan (NPNP) was considered as a 'good' and crucial tool to achieve the aspirations and ambitions of local people, particularly in relation to the

improvement of infrastructure and local facilities (PO9; PO12; TC7; NP0810_NPTC.MK). One town councillor explained that NPTC sought to control the growth and development in the area and consequently the NPNP has contributed to the achievement of objectives as initially intended (TC8; TC9):

I think it's important to have a neighbourhood plan because what you do you plan growth. ... There are developments we want to build something. That's all taken into consideration to look at the whole of Newport Pagnell in relation to the various neighbourhoods there. It's important. (TC7).

We think it addresses our priorities. ... As far as I'm concerned, the neighbourhood plan does what it is supposed to do, because it forms part of the primary authorities planning regulations, if you like, planning policies. That means that our policies are there. They're embedded into the Milton Keynes Council planning policies. That is the real benefit of making a neighbourhood plan in the first place. (TC8).

The NPTC also stated that the NPNP has been useful in the management of development activities (Final Modification Proposal Statement, 2020). However, another councillor felt that the NPNP had not been as influential as initially expected. This councillor pointed out that the effect of the NPNP has been limited due to it generating insufficient levels of finance to support social care or other necessary infrastructure in the area. (TC9).

The plan is not having as much of an impact as we believe it should. We have a pretty sad situation, and I don't think it's unique to Milton Keynes at all. (TC9).

However, it is clear that the 'work' of NPNP substantially depends on the willingness and attitudes of developers, as applicants and the local planning authority, as decision-makers contrary, to take the expectations of NTPC into account. One councillor had taken it for granted that applications have to conform with the NPNP, as a neighbourhood plan forms part of development plan of the local planning authority (TC8):

As far as developers are concerned, they have no choice. They need to address the policies in the neighbourhood plan. Because those policies are now embedded in the primary authorities' policies, the developers must satisfy those policies. ... The neighbourhood plan and the Milton Keynes Council local plan are there to afford certain protections. It is only right and proper that these policies are in place. Yes, we do keep reviewing the plan, because things change. (TC8).

However, despite such supposition, applicants do not always follow the neighbourhood plan, as both the quantitative and qualitative analysis above shows. As another town councillor elucidated that some developers have deliberately tried to find ways to evade requirements within the NPNP rather than adapt their applications to policies. These tactics include seeking

a gap or weakness in the neighbourhood plan, submission of repeat applications, or observing changes to policies in the local plan or neighbourhood plan (TC9). This intimates that some developers seem to regard neighbourhood development plans (NDPs) as a barrier to development.

We're very aware that there are a couple of developers, in this area, who have gotten their eyes on the development that they want to do which the neighbourhood plan is currently prohibiting. They objected to it when the neighbourhood plan was being written, they are not in the 87% who agreed the plan, they are no doubt in the 13% who disagreed with it, and they certainly sent in objections to the plan which we ignored. They are just waiting for the next opportunity to put in a planning application when the neighbourhood plan changes or the Milton Keynes local plan changes. I think that's a fairly common practice amongst developers, and sometimes it applies to the small patches as well. (TC9).

NPTC recognised that the stance and inclination of the LPA is a key influence in the performance and impact of NPNP, although town councillors had mixed feelings towards the LPA. One suggested that the NPNP works as it is supposed to as part of development plan and highlighted that the LPA has referred to policies of the NPNP in assessment of planning applications (TC8). This was corroborated by a planning officer who suggested that site allocation and design policies within the NPNP were unique and fairly effective in setting out specific requirements (PO12). In this respect, the NPNP has drawn the attention of decision-makers to certain topics which have been raised by local people and encouraged actors to address them. Notwithstanding this, however, another town councillor felt that planning officers sometimes overlooked the NPNP and did not interpret it as the NPTC intended (TC9). This councillor additionally pointed out that borough planners often have insufficient local experiences and frequently leave their position.

There are planning applications that go in. There are some significant ones, going around at the moment where the clauses in the neighbourhood plan are actually included in the assessment by the local authority of the planning permission being sought. (TC8).

The difficulty now is that the planning department is a mess, to be frank. They don't even seem to know what they're doing half of them. They're very inexperienced people, they've never stayed for very long. What we have found is that they are just ignorant about the content of the plan and they will respond to planning applications without thinking about what the implication of this is. (TC9).

In addition, the local people and the NPTC have sought to enhance the infrastructure and local facilities through the contributions of developers. The NPNP set out the priorities with respect to planning obligations and the NPTC has been involved in negotiations with developers and planning officers as discussed above (NPNP, 2016; NPNP, 2021). However, the

funding of S106 raised from development within the Newport Pagnell town area is not always used as expected, since MKC has the authority to decide where the money will be used (TC9). One town councillor felt that the LPA does not take the content and intentions of the NPNP into consideration with funds not being directly reinvested into the town. This shows the extent to which the aspirations of local communities in NDPs continuously and substantially rely on decisions of local government in practice.

One of our bigger developments from some years ago produced £500,000 or so as S106 money for development of secondary education. Perfectly reasonable, big development. Not going to build the new secondary school, but you've got to put some money into the S106 Plan. The money is there, Milton Keynes Council now won't let us spend it on our Newport private secondary school because they reckon that the Education Plan is for the whole of Milton Keynes, and they should do what they like with the money that comes in. (TC9).

The S106 money is for the consequences of that development, it's infrastructure for the consequences of that development, not the development of an entire city of 300,000 people. We don't feel that Milton Keynes Council first of all are sufficiently aware of the meaning of the various components of the neighbourhood plan and so forth. That's one reason why we're disappointed. (TC9).

Therefore, the NPNP has been regarded as an instrument to deliver the priorities of local people and to control development activities. The plan, where it set out specific requirements has had a substantial impact on planning applications and decisions, but the degree of its use and implication depends on how actors treat the neighbourhood plan. In addition, the LPA retains decisive power to influence whether the objectives of the neighbourhood plan are realised in practice.

6.4.6 Role of the Neighbourhood Plan Steering Group post-approval

After the adoption of Newport Pagnell Neighbourhood Plan (NPNP) 2016, the Neighbourhood Plan Steering Group has been continuously in place as the Neighbourhood Plan Working Group (NPWG) which is a subcommittee of the Town Planning Management Working Group in Newport Pagnell Town Council (NPTC) (TC7; TC8; TC9). Notably, most members of the group have retained their position since the adoption of the first NPNP in 2016. The NPWG works mainly to produce the NPNP; to ensure the NPNP is upheld through planning policy; to make sure the NPNP is used to assess planning applications; and to revise the plan (TC9; Final Modification Proposal Statement, 2020).

It's about six or seven councillors are members, and that is fixed. They may be re-elected after the committee is reconstituted every year. Mostly, it's the same people who stay on. (TC9).

The existing NPNP 2016 was modified after a five-year review in June 2021. The group has continued to meet every six weeks since 2016 in order to ensure the NPNP works; and decided to modify the existing NPNP in 2019 (NPNP, 2021). The purpose of the review was 'to guide the Town Council in its stewardship of the Plan, to monitor both development and infrastructure as outlined in the Plan, and to consider the need for proposing a review of, or amendment of the Neighbourhood Plan to Milton Keynes Council' (NPNP, 2021, p. 7; p. 47).

Work as a statutory consultee

The NPTC as a statutory consultee has received all planning applications within the Newport Pagnell Neighbourhood Area (NPNA) which covers the whole of the parish of Newport Pagnell (NPNP, 2016; NPNP, 2021). Town councillors highlighted that the NPTC comments on planning applications on the grounds of the NPNP (Section 6.4.5), in order to make sure that their town is not adversely affected; to indicate whether applications comply with the NPNP or not; and to ensure the local planning authority (LPA) assess the proposals against the NPNP (TC8; TC9). This implicitly intimates a need for ongoing work of neighbourhood planning groups (NPGs) post-adoption to ensure the validity and effectiveness of neighbourhood development plans (NDPs).

Generally, we ensure that we are taking proper account, or as far as we can, we're ensuring that Milton Keynes Council, as the planning authority, takes full account of issues where the neighbourhood plan is perhaps saying that this isn't a very good idea, it needs modifying or whatever. ... We carry that all the way through because if we put in a formal objection to a planning application, whether it was on the grounds of the neighbourhood plan or other grounds (TC9).

As one town councillor illustrated, the NPWG is very familiar with the contents of the NPNP and reviews all planning applications, where relevant, against the neighbourhood plan (TC9). Nevertheless, this councillor recounted that the group does not always provide comments on proposals due to time constraints. In addition, the NPWG has sometimes attended MKC's planning meetings or at appeals with 'a right to speak' the concerns and opinions of Newport Pagnell on schemes rather than 'to vote' in determination, as one town councillor pointed out. This reflects the limited leverage NPTC has to influence the determination of planning

applications (TC9), despite producing the plan and being affected by its implementation.

Relationship with stakeholders

The NPTC has different relationships with those who are involved in decision-making. As one town councillor suggested, the town council normally has a close relationship with the MKC as ‘the primary authority’, particularly with regard to Section 106 funding and the assessment of planning proposals (TC8; Final Modification Proposal Statement, 2020) which substantially affect the growth and development of the local area:

We also work pretty closely with Milton Keynes Council because they're the primary authority, in terms of planning application assessments, but also with some of the detailed stuff about, for example, Section 106 payments. ... We know who they are. We're quite well known to each other. (TC8).

There were different responses from town councillors on their relationship with applicants. One described that they work closely with prospective developers, in particular those associated with major developments (TC8). Another illustrated that the NPTC rarely has formal meetings to consult with developers, although they are able to contact them and discuss proposals with town councillors (TC9). Developers may sometimes feel that they do not need to communicate with the town council.

The NPTC continuously communicates with the local community, by ‘one, up to date, and two, being on side, being in agreement with it’, as one councillor described (TC8). This councillor added that the town council ‘gives’ local people the opportunity to express their view or opinions through various means including a quarterly newsletter, the council’s website, social media, and the neighbourhood plan (TC8). This statement suggests that the town council has a leading role, while local people play a more passive supporting role in terms of the production or revision of the NPNP. In other words, the town council may regard local residents as ‘invited participants’ rather than ‘co-workers’ or ‘dominant actors’, despite neighbourhood planning being considered or introduced as ‘community-led planning’ (see chapter 2).

Revision

In early 2019, the NPTC as a Qualifying Body and the Steering Group commenced to modify the existing NPNP 2016 (Final Modification Proposal Statement, 2020; NPNP, 2021). Members of the neighbourhood Steering Group for revision were mostly the same as those who worked on the original plan, since they already had experience and interest in neighbourhood planning (TC9). One planning officer at MKC also participated in at some of the working group meetings in order to consult and discuss the modification of policies (NPNP, 2021). The working group engaged with various stakeholders through letters and emails during a six weeks consultation and encouraged local people and businesses to be involved in the revision online, via post or by visiting the town council (NPNP, 2021). In this respect, the revision can be considered part of the burden of on-going communicative work required to maintain the plan:

- Two years now or three years is the life of a neighbourhood plan and you have to do it again or if your major authority is doing a Local Plan then it supersedes the neighbourhood plan. This is not how we envisaged neighbourhood plans, so that's disappointing. (TC9).

Through the modification, the neighbourhood plan steering group considered 'what changes had been made as a result of the Neighbourhood Plan, whether other changes had taken place in the town and how well the Neighbourhood Plan policies were working in practice' (NPNP, 2021, p. 10). The NPTC conducted its own assessment of the eight policies of the existing NPNP to identify flaws and commissioned an independent professional planning consultant who provided advice on the revision (Final Modification Proposal Statement, 2020; NPNP, 2021). As discussed above, the working group accordingly focused on revising sites where development had already taken place or was in progress, updating to reflect changed national and local planning policies and clarifying the text of requirements to be more precisely interpreted (NPNP, 2021).

In June 2021, the modification was approved by the Milton Keynes Council (MKC) as local planning authority without a referendum in conformity with 'the Neighbourhood Planning (General) and Development Management Procedure (Amendment) Regulations 2017/1243', since there were no significant and substantial modifications to be considered (Final Modification Proposal Statement, 2020, p. 3; NPNP, 2021, p. 8; see also PO12; TC8; TC9).

We made some very small alterations to it in a small modification which didn't require another

referendum. ... just was approved by Milton Keynes Council and by the government as a satisfactory set of changes. (TC9).

As one town councillor described, the town council had not expected to need to revise the plan so soon after adoption and therefore felt that the revision was a burden. Notwithstanding, town councillors revealed that the NPTC had already undertaken to produce version three of the NPNP after the adoption of the second version (TC8). The councillors suggested that the next NPNP will focus more on the town centre rather than the provision of additional housing (TC8; TC9). This intimates that the NPNP is regarded as a useful and flexible tool to realise their aims for the area. In this regard, constant revisions to the NPNP are necessary in order to respond to changed requirements and deal with 'all the things' that 'actually need to be addressed' (TC8). Hence, the on-going efforts of the working group have kept the NPNP on track to try and ensure development is managed as planned:

Now we are working on version three of the plan. It's a constant process. You have to keep reviewing it, but also because things change. Not just because the legislation says you must do this, but you need to check whether things change when you want to do something different with your town. ... On version three, we're looking to do more with the town centre, rather than the whole of the parish. ... This is why you should keep reviewing the plan, ... because requirements change. ... By the time we finish that, I dare say, there's probably version four to start on. I think it is right, though, because we need to make sure that we address all the things that are within our parish of Newport Pagnell that actually need to be addressed. (TC8).

6.5 Summary

Olney Town and Newport Pagnell are both defined as Key Settlements for most new development within the rural area of MK, they are expected to develop the significant quantities of new housing required in the local plan. Both felt pressured due to perceived strains on the capacity of infrastructure but they employed very different approaches toward housing development. Olney reluctantly accepted the minimum housing figures, while Newport Pagnell sought to build much more than required by MKC in order to achieve the aspirations of local communities through the Section 106 funding which is generated by large-scale housing development. The policies within Olney Town Neighbourhood Plan (ONP) 2017 and Newport Pagnell Neighbourhood Plan (NPNP) 2016 (revised in 2021) were both therefore products of complex interactions with the wider context in which they were situated.

The Local plan of MK addresses Olney and Newport Pagnell as 'areas' rather than particular neighbourhood plans, but the Policies Map of the LPA affects and reflects neighbourhood plans and the LPA allows parish and town council to allocate and develop sites in the light of their NDPs. Once the NDP set forth specific sites for particular developments, the LPA normally sought to include them in the policies map. However, differences in site allocations could generate conflicts between local plans and NDP over time. For this, the NPTC revised the existing NPNP to reflect changing planning policies and development environment in order for the valid impact of NDP, while the OTC was preparing to modify the ONP at the time of interview.

During the production of NDPs, OTC and NPTC both discussed sites with developers prior to making allocations and establishing relevant policies. By doing so, if applications comply with the NDP and have a 'good' relationship with town councils, the proposals were positively assessed and often proceeded without substantial conflicts. However, pre-consultation does not always ensure such progress. Rather, it is more important whether the town council and developers are in agreement on the requirements of the NDP.

As the quantitative data illustrated, actors have taken the NDP into account more often on allocated sites than in the wider neighbourhood area. This means that, perhaps unsurprisingly, site allocation with specific requirements is more influential in decision-making. While policies of ONP and NPNP have been less widely used by actors according to the quantitative data, the plans have generated a substantial focus on key topics, defining debates about the determination of planning applications where proposals are closely related to particular policies in the neighbourhood plan. However, in the discretionary planning system, the attitudes and interpretation of various actors remain vital, as cases of decision-making clearly revealed. OTC and NPTC as statutory consultees have commented on developments in order to ensure their plans are taken into account. Notably, they have also participated in negotiations with regard to the Section 106 funding which is generated by housing developments and is useful to address local issues beyond land-use. However, the LPA retains significant power to determine the way monies are used.

The ongoing work of NPGs can be seen as catalyst to enhance the effectiveness of NDPs but comes with no guarantee of influence. After the adoption of NDPs, each council organised a

new group as a sub-committee of the town council who continuously work towards the implementation of the NDP. The roles of the groups are similar in both areas. They monitor changing wider planning policies, respond to planning applications, meet developers and planning officers, participate in meetings of the planning committee, and prepare to revise the existing NDPs. The councils as statutory consultees did not always provide comments on developments, although they and planning officers claimed the significance of doing so. Nevertheless, OTC and NPTC are keen to be involved in decision-making, according to the interviews and qualitative data, despite the significant amount of voluntary time and work this involves. They both attempt to build relationships with stakeholders to remind them of the NDP, relying on the exercise of soft-power which at least one developer regarded with disdain as a political approach to influencing the perception of decision-makers.

Overall, this chapter has explored the performance and impact of NDPs produced by town councils on decision-making. The orientation of NDPs vary with localities including the aspiration and inclination of local people. While Olney Town is relatively protectionist, Newport Pagnell is more pro-development. As ONP and NPNP set forth spatial policies for particular sites, the LPA incorporated them into their policies map. However, the time-gaps caused by plan preparation and the game of leapfrog generated by precedence, makes the role of NDPs on planning applications and decisions complex and uncertain. ONP and NPNP have both been subject to debate and challenge in the determination of planning applications. In this sense, more site specific and clearly defined policies in NDPs have proven more influential. Both quantitative and qualitative data show, however, that the perception and interpretation of actors often seems more important than the NDPs themselves. OTC and NPTC therefore work continuously towards the implementation of their NDPs, in what has become an unexpectedly burdensome task for town councils.

7 Discussion

7.1 Introduction

The preceding two chapters have investigated the role and work of neighbourhood development plans (NDPs) in implementation in four neighbourhood areas (NAs), focusing particularly on the period after their formal adoption (Chapters 5 and 6): Kentish Town Neighbourhood Plan (KTNP), Hampstead Neighbourhood Plan (HNP), Olney Town Neighbourhood Plan (ONP), and Newport Pagnell Neighbourhood Plan (NPNP). The analysis of four cases illustrates how not only the NDP but also the NPGs themselves seek to remain actively involved in post-adoption planning processes, interacting constantly but sometimes in quite different ways with their external planning environments, including planners, developers, plans and decision-making. In this chapter, the empirical findings from this research are brought into conversation with the literature review on neighbourhood planning (NP) and NDPs (Chapter 2) and the idea of the communicative work of development plans (Chapter 3). The chapter therefore identifies commonalities and differences in the impact and work of the NDPs across the four case studies in order to answer the research questions (Chapter 1) and to reflect on the focus of this thesis on the work of NDPs and their implications post-adoption in the interactive contexts in which they operate.

7.2 Roles of Neighbourhood development plans post-adoption

Following the Localism Act 2011, the English planning system was reformed to allow local people to produce neighbourhood development plans (NDPs) in the light of their own vision and objectives, ostensibly generating empowerment and decentralisation (Sturzaker and Gordon, 2017; Wills, 2016). Unusually, in contrast to local plans or previous community-scale plans, NDPs are produced by largely non-professional groups of local people. They invest a lot

of time and effort to prepare NDPs, requiring them to develop planning knowledge and skills, working within the frame of central and local government policy under the hierarchical planning structure in England (Chapter 2). As discussed in Chapter 2, the majority of research regarding neighbourhood planning (NP) has been related to the preparation of NDPs with a smaller sub-set of studies addressing the impact of NDPs largely in terms of quantitative housing figures (DCLG, 2015; 2016; Bailey, 2017; Bradley, 2017; Bradley and Sparling, 2017; Field and Layard, 2017; Salter, Parker, and Wargent, 2022). This thesis has therefore addressed a gap in the research by focusing on the work of NDPs post-adoption, analysing how NDPs contribute to the realisation of the aspirations of local people seeking to shape the growth and development of their areas.

As set out in Chapter 3, the conceptual framework adopted for the thesis views development plans as ‘the product of processes of interaction’ with various external elements (Healey, 1993, p. 100; see also Murdoch, Abram and Marsden, 1999). The four selected cases (see Table 12) were each produced in different contexts and circumstances and consequently different policies have been established in accordance with the distinctive vision and objectives of NPGs in response to particular local issues (Chapter 5 and 6).

Table 12. the context of the four cases

	KTNP	HNP	ONP	NPNP
Neighbourhood Area	Kentish Town Neighbourhood Plan	Hampstead Neighbourhood Plan	Olney Town Neighbourhood Plan	Newport Pagnell Neighbourhood Plan
Borough	The London Borough of Camden	The London Borough of Camden	The Borough of Milton Keynes	The Borough of Milton Keynes
Adopted/revised Year	September 2016	October 2018	July 2017	June 2016/June 2021
Period	2015 - 2030	2018 - 2033	2016 - 2031	2016 - 2031
NPGs Plan-makers	Kentish Town Neighbourhood Forum	Hampstead Neighbourhood Forum	Neighbourhood Plan Steering Group within Olney Town Council	Neighbourhood Plan Steering Group within Newport Pagnell Town Council
Referendum (Results/turnout)	Favour: 90.9% Turnout: 13.75 %	Favour: 91.5% Turnout: 20.5%	Favour: 50.6% Turnout: 38.32%	Favour: 84.7% Turnout: 34.41%

* Three-tier planning system of London: London Plan, Local Plan, and Neighbourhood Plan

Kentish Town and Hampstead are both close to the London Central zone and the Heath and in the same London borough of Camden. Kentish Town comprises both developed and developable areas with large industrial areas, while most of the Hampstead area is already well-developed. To respond to each distinctive local circumstance, Kentish Town Neighbourhood Forum (KTNF) and Hampstead Neighbourhood Forum (HNF) were purposely designated to produce each NDP respectively, as there is no parish or town council. They have comprised mainly local citizens, whilst existing local groups played a leading role in operating the NFs initially. Kentish Town has faced loss of business and office and retail spaces, while the area also has some conservation areas and is cut through by a railway. Despite diverse challenges, it has potential opportunities including high accessibility, and the presence of large and re-developable industrial sites. Local communities decided to produce their own NDP to protect the function of business and retail and to allocate sites for promoting diverse development for economic growth. In this regard, Kentish Town Neighbourhood Plan (KTNP) is regarded as pro-development.

By comparison, Hampstead has attractive and historic places with the green landscape of the Heath. It is a well-developed area with listed buildings and almost entirely covered by the designation of conservation areas. Due to the small amount of developable space, the area has been distinguished by high pressure for development and the high value of properties, particularly through the addition of basements which causes conflicts resulting from the negative impact of construction. Local citizens were also concerned about character, heritage assets, the natural environment, excessive traffic and its resultant air quality. Accordingly, they sought to manage development and to shape the future of their area through their NDP to address these local issues and protect the historical characteristics of the area rather than focusing on economic growth. In this regard, Hampstead Neighbourhood Plan (HNP) has a more protectionist orientation.

Olney Town and Newport Pagnell are defined as Key Settlements for most new development in the rural area of Milton Keynes (MK), and they are therefore expected to develop the significant quantities of new housing required in the local plan. Both areas felt considerable pressure, in particular given the capacity of infrastructure, but they had to accept the requirement of the local plan. Nonetheless, they employed significantly different approaches to housing development. Olney Neighbourhood Plan (ONP) and Newport Pagnell

Neighbourhood Plan (NPNP) were respectively produced by each neighbourhood plan steering group having been mainly led by several existing town councillors and a few local residents. Olney Town was created over two hundred years, and is located in a rural area outside the city, whilst MK was built as a new town in the 1960s. Milton Keynes Council (MKC) has sought expansion and accordingly expected Olney Town to build additional houses. Olney Town has therefore been pressured to build more housing than the town expected or would welcome. They therefore reluctantly accepted the minimum housing figures. Local communities raised the concern that the extra housing developments could undermine the historic identity of the area and the capacity of infrastructure such as schools, GP surgery, and transport. They were concerned about the shortage of smaller and more affordable housing and the lack of employment opportunities in the area. Olney Town consequently decided to produce their NDP in order to preserve the historical characteristics of the area, to provide affordable housing and to manage local issues raised by communities. In this respect, Olney Town adopts a protectionist stance.

Newport Pagnell meanwhile is a town and civil parish and is the largest Key Settlement in MK. Faced with the requirement of MK to allocate new dwellings, like in Olney, local people in Newport Pagnell raised concerns that infrastructure such as roads and schools would be adversely affected by additional housing. Since they had to accommodate extra dwellings to meet the requirement of MK, however, rather than resisting development, Newport Pagnell adopted a different approach by allocating much more housing to use planning obligations for the provision and improvement of infrastructure, including schools or local facilities. In this sense, the inclination of Newport Pagnell is towards a growth-orientation.

NDPs in the four areas were therefore produced in different planning and social contexts, raising different potential issues for the constitution of NPGs, their ability to 'speak for' local communities and possible plan priorities. Thus, in Kentish Town and Newport Pagnell towns, there was a strong emphasis on working with wider plans and initiatives to develop their areas, while Hampstead and Olney towns were more protectionist, with NP focusing on maintaining valued local historical and environmental characteristics (see more Chapters 5 and 6). In Olney this was primarily due to the potential impacts of development pressures from Milton Keynes, whilst in Hampstead the perceived pressure was from overdevelopment. Arguably, in Hampstead, development pressures were less acute given the strength of existing

protection mechanisms (Conservation Areas, green space protection, listed buildings and so on), and NP was largely an exercise of enabling local people to feel that they had greater ownership over planning. Thus, each NDP can be seen as a product of complex interactions with the wider context in which it was situated (Chapter 3; see also Healey, 1993).

Local people in the four cases participated in the production of NDPs for a range of reasons, not narrowly focused on 'housing' development (which was important given the emphasis on facilitating new housing development in national guidance), but also other distinctive local matters. For example, KTNP, ONP, and NPNP designated a number of sites for housing, business or retail in order to improve their areas. That was less of an issue for Hampstead. The HNP set forth a relatively light touch approach, a form of soft intervention focused on adding more requirements to particular policies within the local plan. The HNP did not allocate sites intentionally for development. This, however, does not mean that such HNP had less impact in implementation than others, since the performance of NDPs necessarily varies with what local people seek to achieve through the plan. In this regard, the impact of NDPs cannot be assessed only by the degree to which a plan results in physically visible changes to the local area. Rather, it should be also examined in another way: by considering what the visions and objectives of NDPs are (in other words, what local communities seek through their NDPs); whether the NDP then 'works' in line with the original intentions of local people; and the extent to which the NDP contributes to the realisation of the aspirations and ambitions of the local people.

The distinctive contexts and characteristics of localities and different inclinations of NPGs are shown to bring different approaches and provisions to NDPs in the four areas. The NDPs studied aim to protect and improve their areas and to manage development activities, but each NDP placed different emphases on precisely what should be the content of the policies, how restrictive they should be, and exactly what the NDP should cover. In addition, the four NPGs have employed different strategies to overcome similar challenges. For example, in terms of the provision of housing and its implications for the capacity of existing infrastructure and local facilities, ONP more typically (since, as discussed in Chapter 2, only a small number of NDPs have allocated sites for housing development above the requirements set out in local plans) sought to meet a minimum requirement in order to resist excessive developments. NPNP meanwhile adopted a more proactive approach by designating sites for considerably

more housing in order to use the Section 106 monies to fund local matters beyond land use, reflecting a pragmatic approach to working with housing development as set out in the local plan.

Moreover, compared with local plans, NDPs are more intensively focused at the neighbourhood scale in order to deal with locally-specific affairs. As a result, different policies are set forth in each NDP due to the different aspirations and concerns of local people. In this sense, the formats, structures and policies of the NDPs inevitably vary with the priorities of each neighbourhood area (NA) responding to their respective local contexts, and reflecting the particular concerns and interests of local residents, typically dealing with locally-specific issues rather than considering all planning affairs.

The form and contents of plans are also 'shaped by other plans, policies and strategies' which are specific to a given time and place (Cullingworth et al, 2015, p. 86). It is worth noting that one dimension of all of the four case study NDPs is consequently the adaptation of 'selective' policies from the existing local plan in order to more precisely fit with local concerns, enabling the creation of extra requirements to manage development activities beyond those the local plan addresses. For instance, KTNP requires pre-application consultation and statements of community consultation for large developments while HNP ask applicants to submit a consultation statement for basement construction, reflecting the concerns about that form of overdevelopment (Sections 5.4.6 and 5.5.3). KTNP, ONP, NPNP all included specific design policies for certain sites over and above the requirements of local plans.

All NPGs therefore showed the awareness and knowledge needed to take forward distinctive and potentially innovative policies, albeit in a context where the scope for transcending, challenging or modifying the local plan was limited. The NPGs developed their policies through various consultations and surveys with their communities in order to identify community concerns and aspirations and develop a shared vision to shape the development and growth of their local area. Despite their efforts, however, with few possible exceptions, often related to design and site allocations, many policies were still regarded as repetitive of policies within local plans rather than adding value by planning officers and developers (NF1; PO1; PO4). This reflects the fact that policies in NDPs are limited to issues of land-use and must fit with wider national and local planning policies. The four NDPs therefore have limited

scope to fully address the concerns and interests of local people, such as mobilising around distinctive issues such as schools, air pollution, infrastructure or various transport sectors that lie beyond the remit of the town and country planning acts. As a result, the NDPs as a whole did not have the scope to explore more ambitious or transformative approaches.

Nonetheless, each case the NDP endeavoured to find a way to address particular issues raised by local residents. In other words, NDPs often sought a different, or less direct route, and adopted detours to overcome these limitations. When KTNP, ONP and NPNP allocate developable sites through spatial policies, they anticipated the use of planning obligations for the provision or improvement of infrastructure, schools or local facilities beyond the planning sector. HNP, meanwhile, has adopted a different approach by associating non-planning issues with planning policies and seeking to consider them together. Thus, although additional schools and air-pollution are not directly related to land-use planning, the HNF has sought to build links to such matters through its policies on transportation (Section 5.5.3).

Different NDPs were therefore made by different groups of citizen-planners within different contexts to address different concerns and to achieve different aspirations. This in turn shaped both the content of the NDPs but also the nature of their interactive relationships post-adoption. In this respect, NDPs can be considered as ‘the product of interactive contexts’ (Healey, 1993, p. 83). The next section thus explores the interaction of NDPs with their external environments across the four cases, returning to the conceptual framework set out in Chapter 3 to consider: how the NDPs influence decision-making and subsequent local plans; the ongoing ways NPGs act to make sure that their NDPs work as intended; the extent to which their ongoing actions are influential in the implementation of the NDP; and in turn how such interactions affect work and effectiveness of NDPs across the different contexts studied.

7.3 The Communicative work of neighbourhood plans in implementation

NDPs are produced through complex processes and interactions with a range of parties within

complex and dynamic planning contexts (Chapter 2). The four cases (Chapter 5 and 6) highlight that NDPs post-adoption constantly affect and are affected by their external planning environments and dynamic circumstances. As Healey (1993) argues a development plan 'becomes an object, a point of reference, for continuing interactions'. In Chapter 3 the thesis argued that the effectiveness of NDPs is substantially related to (and shaped by) three key contexts: the production of local plans, the process of decision-making, and the activities of NPGs.

Each of four cases has locally specific and distinctive features shaping their particular interactive planning contexts and therefore the work that NDPs are required to engage in post-adoption within the discretionary but hierarchical planning system in England. The differing interactions with external factors can result in NDPs having very different impacts. Drawing on the findings from across the cases, this section aims to discuss how external factors shaped the work of NDPs within these different contexts, and consequently to reveal whether or how such interactions undermine or enhance the effectiveness of NDPs.

Interaction with local plans

Development plans are always in an interactive relationship with a range of other plans and strategies. NDPs and local plans in particular co-exist and have a complex relationship as parts of the statutory development plan in England. NDPs are the lowest tier plan within the hierarchical planning structure in England. This results in a power imbalance between them, since NDPs have to comply with existing higher-tier planning policies such as local plans, the London Plan in London, and National Planning Policy Framework (NPPF). National and local planning policies provide guidance but simultaneously bound and delimit the range, content, and potential for innovative and creative approaches of NDPs within the hierarchical planning structure. NDPs selectively extract and draw upon certain policies from those higher-level plans, seeking to adapt and strengthen them to fit locally-particular circumstances. In this respect, the NDP (are expected to) contribute to the goals of both local and national government.

Conversely, however, NDPs can also impact subsequent iterations of the local plans produced

by LPAs. In other words, NDPs can communicate and deliver the concerns, perspectives, aspirations, interests and wishes of local areas to LPAs, enabling them to be reflected in subsequent local plans. However, in reality, it is hard to trace how NDPs or their policies influence local plans beyond specific spatial policies associated with site allocation for development. Higher tier plans are generally less specific and detailed than NDPs, which can create opportunities to influence more detailed or site-specific designations. For example, one large spatial development policy in the KTNP became a key policy in the revised Camden Local Plan (page, 85-89), representing a large development that was considered influential at the borough level beyond the neighbourhood area (NA) designated for KTNP. Similarly, in addition, sites allocated in KTNP, ONP and NPNP have been reflected in the strategic maps of LPAs.

In contrast, HNP does not set out any particular spatial allocations for larger developments, instead adding requirements for planning and development activities to fit their local environment. This reflects the fact that Hampstead is already well-developed and has less space available for large-scale development (page, 107). In this regard, caution is needed to assess the interaction of NDPs with local plans merely through processes of textual 'reflection' in local plans without accounting for local contexts and the different purposes and intentions of NDPs which may not always necessarily seek to directly affect local plans. However, it is also significant to note that a number of participants pointed out that more specific policies of NDPs were likely to be considered more robust and therefore to be more influential in shaping local plans, as opposed to those that largely duplicate or repeat existing policies in local plans (NF1; NF2; PO3; PO4; PO9; PO12; DEV1). That is, NDPs need to add value through the detail and tailoring of policies rather than (re)producing general guidance.

Notably, LPAs and NPGs are required to collaborate in the production of both local plans and NDPs (KTNP, 2016) (Camden - PO1; PO2; PO4; PO5; Milton Keynes - TC4). The perception and attitudes of LPAs are therefore crucial in shaping the impact and influence of NDPs, as they have the authority to determine the extent to which NDPs within their area will be taken into consideration during the production of subsequent local plans. As they have to hold consultation, NPGs and local people have opportunities to engage with LPAs, but LPAs have discretion to decide the extent to which they will reflect provision of NDPs in their local plans.

NDPs can be useful as a negotiation tool for NPGs to debate with LPAs (Camden - NF2, page, 138). NPGs can support or reject on grounds of particular policies of NDPs, and the LPAs have to take their comments into consideration during the evaluation of proposals. That is, NDPs helps NPGs make 'better arguments'. However, this clearly implies that NPGs are required to play an ongoing role to advocate for NDPs to be reflected into the local plans. This is particularly important since NDPs can be intentionally or unintentionally reworked or ignored during the production of local plans, as will be discussed in this section later.

The timing of the production of plans is another key parameter in the relationships between local plans and NDPs which in turn affect the impact of NDPs in the implementation stages. To be specific, precedence in decision-making continuously changes over time. The above practical cases frequently illustrate that the time-gap has caused conflicts of precedence between local plans and NDPs in practice, particularly when it comes to the determination of planning applications. There were several examples within the case studies of how this can play out in practice. For example, one application was able to be approved, since a particular policy within the emerging ONP designated the site as a developable land for employment-led mixed-use development during the decision-making period, while the land had been still defined in Open Countryside on local plan. For another instance, one proposal for housing development on the site set out only for retail use in ONP was able to be appealed, since the substant local plan defined the site as Shopping and Leisure. This indicates that the relationship with local plan can make NDPs sometimes more or less influential over time with significant impacts on the power and efficacy of the plan, potentially undermining or enhancing its capacity to achieve the priorities and aspirations of local people.

In the case of ONP, the NDP was given more weight in the determination of a planning application for the site B, since the ONP 2017 had precedence over the MKC's Core Strategy 2013. In contrast, another site, came forward after approval of a revised 2019 local plan that allocated it for 'shopping and leisure' rather than the retail units proposed by ONP in 2017. The appeal inspector emphasised that 'an up-to-date plan with policies which would take precedence over the ONP' (Appeal Decision of APP/Y0435/W/20/3247144, p. 5). The unstable status and interactive relationship of NDPs with local plans is a significant inducement for NPGs to constantly review and revise their plans in order to maintain their effectiveness over time.

Interaction with decision-making

Once adopted, development plans work as evaluation standards for planning proposals. Under the discretionary planning system in England, the plans affect subsequent development through their influence on those who are involved in the process of decision-making. That is, the plans send messages to audiences who read and make use of them (Healey, 1993). This implies that development plans draw actors' attention and persuade them to take specific planning matters into account in particular ways.

The four NDPs studied all became part of development plan which has to be considered in the determination of planning applications (Chapter 5 and 6). As the quantitative evidence from each case revealed (page, 93, 126, 176, and 212), those involved in the process of decision-making clearly do make use of NDPs, where they are considered relevant to decisions. In other words, the NDPs studied have conveyed the priorities of local people to relevant actors and provided topics of debate that need to be considered when determining planning applications. However, it is necessary to be cautious in examining how and why any of the NDPs exerted influence in decision-making, since this varies significantly depending on the types of planning applications that come forward, the perspectives decision-makers take, and the NDP policies proposals relate to. In this regard, the impact of the NDP is shaped not only by the plan itself but also various external factors. Hence, different NDPs interact with different actors within different planning contexts meaning caution is required when trying to establish whether LPAs give more or less weight to NDPs in the determination of planning schemes, particularly in drawing inferences 'only' from the number of citations of an NDP, since these may be no more than formal acknowledgements of a relevant NDP policy and may also reflect the orientations of 'individual' planning officers rather than the view of 'the whole' LPA.

These qualifications aside, the quantitative data from each NDP illustrates that the NDPs and their policies have been unevenly cited by actors during the decision-making process. It is noted that applicants and consultees have discretion to take NDPs into account, while decision-makers such as LPAs ostensibly have to consider the plans. While all policies in NDPs involved the significant investment of time and effort by local people only between 16-22% by applicants and 73-78% by LPAs were subsequently drawn upon in decision-making

processes. This rose to 50-75% by applicants and 50-92% by LPAs by others for bespoke or spatially tailored policies such as site allocations or 'specific' design requirements. This seems to reflect the attitude of planning officers towards NDPs, with several emphasising the importance of locally-particular policies rather than those they considered to be merely repetitive of policies within local plans (NF1; NF2; PO3; PO4; PO9; PO12; DEV1). In this respect, NDP policies have been much more widely more taken into account on allocated sites than across the whole neighbourhood area (NA).

An exception to this rule was HNP with planning officers valuing the tailored policies which closely reflected the distinctive local context (PO3; PO4; PO9; PO12). Although this plan set forth no spatial strategies and consequently did not bring large physical changes, the HNP and its policies were still taken into consideration by key actors including local residents and organisations and, in particular, more powerful actors such as LPAs throughout the decision-making process more than in the other three NDPs. This means that the relevant actors have perceived the relevance of the plan and used it in the assessment of development proposals against policies of the plan.

This may also reflect the fact that the Hampstead Neighbourhood Forum (HNF) has commented on planning applications much more than Kentish Town Neighbourhood Forum (KTNF), Olney Town Council (OTC), and Newport Pagnell Town Council (NPTC). However, it is notable that a high level of citation does not imply that the results of determination is always aligned with the intention of the NPG and the NDP, since the determination of development schemes depends on a wider range of considerations, including the interactions of NDPs with decision-makers, the local plan, and the relationship between policies, other material considerations and proposed developments. This was very clear, for example, in the case of the housing development proposed on site R in the ONP (page, 179).

In addition, actors at key stages have used 'different' policies in NDPs for the production and assessment of the 'same' planning applications, according to the quantitative data pervasively indicated throughout all studied NDPs. This means that different readers and users have different perspectives on the relevance and suitability of provisions within NDPs. In this regard, NDPs convey different messages to different actors (Healey, 1993) and the audiences in turn differently perceive, interpret and apply the plans.

NDPs may also have a degree of invisible power as gatekeepers for applicants in the implementation phase. As some planning officers (PO5; PO7) and HNF's website suggest (NF2; page. 135) there is some evidence that potential applicants may hesitate, amend or even withdraw their proposals when their projects are not fully in accordance with NDPs. In this sense, even where developers do not cite the NDP, they may still be considering and incorporating NDP policies into their thinking. However, further research would be needed to trace the extent of any such changes to applications as a result of NDPs.

Under the discretionary planning system in England, the NDP is influential in decision-making depending on how much weight actors choose to afford it. The impact of the NDP therefore varies with actors' interpretation of policies in the NDP for the production and determination of planning applications. Since actors are differentially positioned within the decision-making system, NDPs have quite different relationships with different actors throughout the decision-making.

Applicants and consultees have discretion to take NDPs into account, while decision-makers such as LPAs have to consider the plans but have discretion to decide how much weight to give the NDPs in determination of planning proposals. The NDP provides a framework for applicants and developers through the specific wording of particular policies with specific requirements to produce their developments effectively, in particular, regarding spatial and design policies. Also, the developers can recognise aspirations and orientations of local people. The applicants are aware that if they bring a development site forward in accordance with the requirements and priorities of local people in the NDP, it provides them a certain level of certainty that their applications will be considered favourably and positively not only by NPGs, but also decision-makers, as some interviewees responded (TC1; TC4). However, some developers tried not to give way or find a detour to achieve their goals, finding out weakness of NDPs. For example, in Olney proposals for housing were submitted even in area designated for retail units by ONP but approved at the appeal. The developer suggested development of additional dwellings on the basis of market evidence for there being no interest of retailers and unmet demand for retirement housings.

Moreover, consultees, like developers, have no direct power to decide schemes, but their consultation responses have an impact as the comments have to be considered by the LPA.

In this regard, the relationship with local individuals or groups can be beneficial to the NPGs, if they speak with one voice and use specific policies of the NDP as evidence of their comments. The HNF therefore keeps a close working relationship with local individuals and groups to discuss particular development schemes before responding to consultations on development schemes. However, most public consultees normally provide their comments on the basis of personal feelings or experience rather than planning evidence, and consequently this raises questions about the necessity or effectiveness of the NDP for local people.

When it comes to the decision-makers, the LPA has more power and is in the centre of relationships. Decision-makers use policies in NDPs as grounds for negotiation and as a decision tool for determining whether to approve or refuse planning applications (PO5; PO7). This implies that the realisation of the aspiration on the NDP relies significantly on the stance and decision of LPAs. In this regard, applicants and NPGs respectively are both keen to develop a close relationship with the LPA who ultimately have substantial power and responsibility to decide planning proposals and the agreement of planning obligations. Furthermore, the elected councillors as elected representatives have a significant power to overturn the recommendation of planning officers and to determine planning applications. Understandably, politicians often seem particularly conscious of the stance, attitudes, feelings or concerns of local people who are their electorate, as a result they do sometimes support the stance of NPGs even in opposition to the views of their planning officers (TC4; see more, page 133; 184; 195-6). One developer described, councillors as politicians stand on the political rather than technical side unlike planning officers (DEV1), whilst town councillors felt that the politicians normally are supportive and favourable to NDPs (TC2; TC4).

In such interactions, the NDP can provide a place of debate by ensuring particular topics are considered which reflect the key concerns and interests of local people, drawing the attention of other actors to address (or contest and seek to bypass) them. The NDP therefore acts as a form of guidance, providing criteria of assessment and encouraging other actors to assess planning applications against its policies. However, the performance of NDPs varies depending on the different perspective, interpretation, inclination, and power of actors. In this regard, NDPs with specific policies on the basis of robust evidence and strong reasons are considered more 'successful' in inducing audiences and, if necessary and possible, altering

their attitudes. KTNP, ONP, and NPNP have all been more fully taken into account on allocated sites.

It is also important to note how the results of decision-making in turn affect subsequent iterations of NDPs. Decisions reveal gaps and weaknesses in NDPs. This feedback can then be reflected in the revision of the NDP to try and make it more influential in future decision-making and to better achieve the goals of the NDP. Many NDPs are therefore being reviewed every five years. While KTNP, HNP, and ONP had been not reviewed yet in the period of field work, NPNP was revised in the light of varying development activities and changing planning contexts including national and local planning policies. NPTC had immediately begun to prepare the next version. In this respect, NDPs are clearly regarded as a useful tool by at least some local people who are willing to invest substantial time and energy not just in their production but also their subsequent modification.

The preceding subsections have indicated how NDPs 'work' post-adoption by exerting influence over the production of local plans and in the process of decision-making. Throughout we have highlighted how NPGs are involved throughout such procedures. The next section will therefore explore the role and work of NPGs in more detail, including how they seek to ensure that NDPs are properly used in planning contexts and whether their activities influence the performance of NDPs.

Interaction with NPGs

Planners interact with plans (Healey, 1993). In neighbourhood planning (NP), NPGs uniquely are both citizen-planners and those directly affected by their NDPs, while the professional planners who produce local plans are not necessarily directly affected by them and may, for example, move jobs before they are ever approved and implemented (page. 185; TC2; TC3; PO10). Without a statutory role in implementation, some researchers have raised concerns about the status of NPGs post-adoption (Cowie and Davoudi, 2015; Locality 2018). In all four cases, however, the NPGs recognised the work required to influence implementation and therefore sought to retain a continuing presence within the areas covered by their NDPs, this was particularly significant for the NFs formed solely for the purposes of NP.

NP provides local people some latitude to be involved in implementation stages but only indirectly through participation in the development of NDPs which will be used in the production of subsequent local plans and the process of decision-making. Local aspirations are not straightforwardly reflected in a plan as aspirations and ambitions of local communities are rescripted during the production of NDPs, whilst the NPGs as plan-makers have to shape consultation responses into policies that are acceptable and might be influential within the context of a NDP. However, the local communities across all of the cases have, to some extent, loaded their priorities and aspirations into their NDPs and therefore hope that the plan will deliver their genuine and original messages to 'readers' (Healey, 1993)– the actors who are substantially involved in the production of local plans and the process of decision-making until the end of the plan period. Local people certainly have reasonable expectations that their NDPs will influence subsequent planning activities including the production and assessment of planning applications.

Under the discretionary planning system, however, the effectiveness of the NDP varies with how relevant actors perceive and treat policies in the NDP, attaching more or less weight to it in the production and assessment of planning applications. That is, the meaning and intention of policies within the NDP are likely to be changed over time by different actors at the different stages of the planning process and the NDP even could be readily and even intentionally overlooked in practice (page, 227-8), even if in principle it needs to be regarded as a material consideration in decision-making. The case studies clearly show that NDPs are sometimes misinterpreted or disregarded deliberately (page 180; 221; TC9). For example, there was the issue regarding the interpretation of design quality which can be variously accepted by different actors. Furthermore, as the quantitative data from each case showed, there are clear citation gaps among different actors at key stages. For instance, while NPGs cite several policies in their comments, developers, consultees and planning officers use considerably less or do not cite policies in their statements.

As discussed in the two subsections above, NDPs interact with the production of local plans and the process of decision-making through their influence on the interpretations of various actors. NDPs deliver messages to the actors but the degree of reflection/considerations depends on their perceptions and attitudes toward NDPs. Meaning and intentions of development plans are reworked and reinterpreted by different actors through the

implementation stages (Chapter 3). This can all cause uncertain and instable use of NDPs based in either the ignorance or misinterpretation by actors. It is exacerbated by unbalanced power relationships between those who produce the plans and those who use them and have more direct influence over their implementation. All of which subsequently affects the ongoing activities of NPGs, creating an imperative for NPGs to ensure that NDPs are faithfully upheld and used as 'originally' intended. The NPGs for four studied NDPs all perform significant ongoing work due to the uncertain and unstable work and influence of NDPs.

The NPGs perform various tasks, including maintaining relationships with stakeholders, participating in relevant meetings such as local authority Planning Committees, and engaging with public consultations by developers and on planning applications. Three key, broad roles of the NPG as a catalyst of the NDP have been undertaken across the four cases in order to influence, directly and indirectly, the work of the NDP in the implementation stage: reviewing and updating the NDP, observing and responding to changing development activities and local plans, and maintaining relationships with LPAs and other actors. It is worth noting that, most of the NPGs (KTNP, ONP and NPNP) themselves make less use of their own NDPs in their comments on planning schemes than HNP (see, page 93, 126, 176, and 212; Table 2, 4, 7 and 10). In terms of revision of NDPs, although KTNP, HNP, and NPNP were not yet doing this, participants in interviews expressed their willingness to improve the NDPs by filling gaps and enhancing their strength. This implicitly indicates they believe that NDPs are useful to achieve their vision and objectives as it seems unlikely, they would otherwise invest the enormous amount of time and energy to be required to develop and revise the plans. However, the ongoing work required to ensure the relevance of NDPs also creates a level of volunteer commitment that has arguably not been fully appreciated by either government or academic research to date.

The NPGs across the four cases have similar aims associated with post-adoption work but attach more or less weight to different activities in line with the characteristics of the area and the attributes and orientation of the NPGs. Kentish Town Neighbourhood Form (KTNF), Olney Town Council (OTC), and Newport Pagnell Town Council (NPTC) all focus largely on the relationship with applicants and landowners to discuss the direction of developments, while Hampstead Neighbourhood Form (HNF) concentrates on the relationship with local people and groups and invests considerable time commenting on planning applications to reduce

potential conflicts and controversies.

In all cases, the NPGs for those NDPs invested a lot of volunteer time and energy to prepare the NDPs over an extended period time. Most members of the NPGs remain involved post-adoption of the NDP and continue to monitor and support the performance of the NDP. Town councils and neighbourhood forums (NFs) both seem to be aware of the necessity of this and remain keen, or at least committed to being involved in practice in decision-making processes, though they also recognise a considerable burden to keep this work going. NFs in particular need to redesignate their status every five year. According to the limited evidence from the cases, however, both NFs are more actively involved in ongoing implementation judged by the number of citations on planning applications, participation in various meetings with planning officers, developers, relevant organisations, and internal meetings etc.

7.4 Summary

This chapter has explored the impact and performance of NDPs through the four case studies (Chapter 5 and 6) in line with Healey's (1993) concept of the communicative work of development plans (Chapter 3) and responding to the key questions and objectives of the thesis (Chapter 2). The majority of studies on neighbourhood planning (NP) has been concentrated on the preparation stages of NDPs and their outcomes (Chapter 2) rather than the performativity of NDPs in the implementation stages. By tracing the work of NDPs as 'living documents' post-adoption this research has explored how they interact with external planning contexts and highlighted the ongoing work involved in ensuring the implementation of NDPs. Therefore, this research contributes to filling a significant empirical gap by focusing on the work and effectiveness of NDPs in practice. This chapter has shown how the selected NDPs are all products of distinctive contexts that they continue to interact with after adoption. The NDP as part of development plan consequently contributes to the realisation of wishes of local people overall, although the plan has challenges to overcome limitations associated with the range of its policies.

The four cases have revealed that NDPs convey different messages to different audiences

during implementation phases and that different actors interpret and seek to make use of the NDPs in different ways. The original meaning and intention of the NDPs can be consequently reshaped by users and actors unintentionally or strategically under the discretionary and hierarchical planning system in England. Under the discretionary planning system in England, the NDP itself is influential through the policies but its effectiveness varies with the ways it interacts with the orientation of wider plans and the perception and interpretation of actors who are involved in decision-making.

Furthermore, due to the lower status of the NDP within the hierarchical system, the NDP requires ongoing committed involvement of NPGs to make sure that the plans 'work' and have the kind of influence initially intended. In the cases studied, the NPGs have seemingly been keen to continue in this role and have been able to ensure that the plan is being updated and used in the progress of decision-making and the production of local plans, even though it remains subject to the interpretation of other, more powerful actors such as LPAs. Despite the constant and often substantial work of the NPGs, the implications of this planning work being done on a voluntary basis have not yet been fully considered. In this context, as others have found, the NDP is valuable in building proactive groups of local areas at community level and could be useful in the future, especially if national policy frees up more space for manoeuvre. However, the challenges of sustaining engagement also need to be addressed. This should be considered important for both central and local government in so far as they are committed to ensuring the potential contributions of neighbourhood planning are realised. In this sense, the energy invested in producing NDPs should not be allowed to dissipate and there is clearly a willingness to be involved in planning policy beyond the production of NDPs. The wider contribution of the research is now explored in a conclusions chapter.

8 Conclusion

8.1 Introduction

Development plans in England have considerable power to influence and shape the growth of the real world, potentially giving material expression to the vision and objectives written into their policies. Despite their substantial implications for people and places, there is a relatively lack of studies on the neighbourhood development plans (NDPs) after their adoption. To bridge the research gap between their preparation and subsequent outcomes, this thesis has focused on the work and impact of NDPs post-adoption, based on empirical evidence and a theoretical approach drawing on Patsy Healey's (1993) idea of the communicative work of development plans. This chapter brings the thesis full circle by returning to responds to the research questions that were posed in Chapter 1 before then going on to identify the limitations of this research. The chapter then goes on to discuss the contributions to knowledge of the thesis, including its implications for both planning theory and practice. It ends by making suggestions for further future research.

8.2 Returning to the research questions

This thesis has examined the interactions of NDPs with their external environments, based on both quantitative and qualitative data drawing from the four case studies. It has therefore explored the performance and effectiveness of NDPs post-adoption by focusing on the ways they interact with their external contexts. The thesis now returns to see how this evidence helps us answer the research questions set out in chapter 1.

The thesis set out to address the following overarching research question, 'what is the role and impact of NDPs in the implementation stage?'. Three sub-questions were also set out are as follows:

- How are NDPs perceived and used by those who produce the plans and other actors

involved in the implementation of the plan? How does this affect the ways NDPs are implemented and influence subsequent change?

- How do NDPs interact with local plans, and impact on decision-making?
- Whether and how do neighbourhood planning groups who prepare NDPs seek to ensure the NDP is actually upheld and used in practice?

The first sub-question has been responded to on the basis of the theoretical framework set out in Chapter 3 coupled with the analysis of quantitative and qualitative data set out in Chapters 5 and 6. While NDPs as part of development plans should have a range of effect on planning applications and decisions, given the nature of the discretionary planning system in England, the degree of the impact of NDPs in decision-making substantially relies on the perception, interpretation and attitudes of decision-makers who have defined power and authority to determine development proposals (Wargent and Parker, 2018; Salter, 2021; Sturzaker, Sykes, and Dockerill, 2021). However, there is less evidence 'how' their perception and attitude practically perform and affect the impact of development plans in the implementation phase, in particular, with regard to NDPs produced by citizen-planners. Thus, this thesis identified and scrutinised how NDPs influence those who read and use the plan in the implementation stages.

NDPs in the case study perform communicative work (Chapters 3 and 7). They are interactive and less indirective (Healey, 1993) and accordingly more focused on creating a place of debate and on ensuring various actors pay attention to key concerns and take them fully into account in the implementation stages. The NDP acts as a form of guidance, providing criteria of assessment and encouraging decision-makers to assess planning applications against policies of the plans. In this regard, neighbourhood planning groups (NPGs) regard NDPs as a useful negotiation tool over not only development but also S106, since policies of their plans reflect the key priorities and concerns of local people in specific situations. However, empirical data collected and analysed explicitly disclosed that policies of NDPs were regarded as a principal criterion or as supplementary depending on different individual actors. There is relevant evidence that NDPs are less effective in promoting community interests where they are opposed to those of local planning authorities (LPAs) as decision-makers. In this respect, this thesis clearly indicated that the work and impact of NDPs are substantially shaped by the perspective, interpretation, inclination, position, relationship and power of individual actors

but always operating within a system that gives them certain powers. Thus, it is worth noting that the effectiveness of NDPs needs be considered with not only direct influence as the nature of development plans but also indirect influence as a communicative tool.

In addition, the second-sub question was related to the interaction between local plans and NDPs. This has been answered by comparing policies between both plans via documentary analysis and scrutinising the use of them in decision-making based on the embedded practical cases (see more Chapter 4). A NDP becomes part of the development plan alongside local plans (in London, also London Plan) once it is adopted. Previous studies argue that NDPs have an interactional relationship with local plans and their relationship is affected by the timing of production of plans (Parker et al., 2017; Salter, 2021). However, there is less evidence 'how' NDPs are influential local plans and vice versa in the hierarchical planning structure in England, and 'how' the time-gap between them impact decision-making in effect. Thus, this thesis compared local plans and NDPs to identify how they consider and reflect existing plans to each other; and scrutinised practical cases relating to decision-making to identify how their relationships operate and affect the determination of planning permission in practice.

This thesis displayed that the relationship between local plans and NDPs are complementary but hierarchical. Local plans as guidance frame and limit the range and scope of NDPs and, as Chapters 5 and 6 described, NDPs set forth provisions at the community level and scale which local plans insufficiently deal with. This indicates that NDPs deliver concerns and voice of local residents and workers to LPAs who produce and manage local plans and control development activities. Evidence explicitly revealed that locally-tailored policies such site allocation or addition requirements to local plans, but broadly aligning with the aims and aspirations of the NDP, are more influential rather than merely the duplication of policies within existing local plans. Quantitative data in all of the four cases explicitly disclosed that policies regarding site allocations and design have been more cited than other policies during the process of decision-making (Table 3, 5, 8, and 9). Furthermore, embedded practical cases relating to decision-making through four cases clearly disclosed that the game of leapfrog, produced by precedence and information discrepancies that emerge from the time-gaps, impact significantly on the determination of planning applications and the timing of plans therefor undermine (or potentially enhance) their influence. In this regard, this consequently generated a need for ongoing work of NPGs post-adoption to chase changing planning

environments and update their plans in order to retain the status and validity of the plans in the implementation stages. Thus, it is significant that the effectiveness of NDPs vary with the relationship with the higher-tier planning policies.

Furthermore, the third sub-question is related to the role and work NPGs post-preparation in the implementation phase and answered by scrutinising the interaction between their activities and the performativity of NDPs. Whilst local residents and workers invest a lot of time, energy and effort to produce their own NDPs and have willingness to involve in decision-making (Parker, Lynn, and Wargent, 2015; Bradley, 2019; Wargent, 2021; Salter, Parker, and Wargent, 2022), they have no formal role. There is a lack of studies with respect to their status and role post-adoption in the implementation stages, while some researchers highlight the significance of communities in neighbourhood planning (NP) (Healey, 1997; Lowndes and Sullivan, 2008; Sturzaker and Gordon, 2017; Salter, Parker, and Wargent, 2022), and concern the potential dissolution of NPGs after the preparation of plans (Cowie and Davoudi, 2015; Locality, 2018). This project thus analysed the status of NPGs and their work to ensure that their NDPs are fully taken into account during the process of decision-making, through quantitative and qualitative approaches framed in Chapter 4.

This thesis identified that NPGs in all of the four cases continuously retain their status and continuously attempt to involve themselves in decision-making in various ways. Their ongoing work in the implementation stage are mainly reviewing and updating the NDP, observing and responding to changing development activities and local plans, and maintaining relationships with LPAs and other actors (Chapters 5 and 6). There is evidence that NDPs are more effective where NPGs continue to advocate for their plans and have the capacity to engage fully in the ongoing flow of development activity. However, NDPs and NPGs do not have defined powers and authority within the implementation process and there is no guarantee how, or the extent to which, their NDPs are fully upheld and used in decision-making in line with NPGs intended and hoped. Therefore, they leverage soft power to make sure that the work that goes in will lead to the desired outcomes. The soft power coupled with NDPs seem to be more effective and better recognised by the political than the technical sides of LPAs. Empirical evidence showed that NDPs are a means of increasing the weight of community views as a material consideration but this seems to require ongoing vigilance to realise in practice while NPGs as voluntary citizen-planners consider such ongoing work as a burden. This thesis also

revealed that activities of NPGs post-adoption vary with what priorities they seek to achieve and address through their NDPs. Thus, NDPs as 'living documents' post-adoption continuously affect and are affected by external planning contexts and in turn their interaction influences the implementation of the plans. This consequently brings a need of the ongoing work of NPGs in ensuring the use and effectiveness of the plans.

8.3 Limitations of the research

It is important to acknowledge that there are some limitations that should be taken into account in assessing the findings of the research. The main challenge encountered in the process of the field work was securing interviews with some key actors due to limited access in particular under the substantial restrictions resulting from the COVID-19 pandemic.

While the participants involved in the research were less balanced than hoped in terms of their positions and roles, interviews were ultimately conducted with members of all core actor groups at key stages in decision-making, including: town councillors and members of neighbourhood forums, citizen planners; planning officers and councillors of the Planning Committee as decision-makers; and 'one' developer as an applicant or agent. There was limited access to other key stakeholders including the wider membership of neighbourhood forums, 'more' developers and local people. Unfortunately, many of those approached did not respond to requests for interview.

Perhaps the most significant gap here is applicants for planning permission who are key actors, as they initiate development proposals. The decision-making process then evaluates whether proposals comply with development plans, including 'NDPs', and any other relevant material considerations. However, with one exception most applicants refused or did not reply to invitation at all across all four cases. In addition, for one neighbourhood forum, it was a considerable challenge to arrange interviews since certain key gatekeepers controlled access and other members simply passed the invitation on to them, as stated in Chapter 4.4. Due to COVID restrictions it proved very difficult to access local residents or workers in neighbourhood areas notably. Regardless of whether they participated in their preparation,

their views towards NDPs are significant, as they will be directly affected by the performance of NDPs.

To address this limitation, the thesis sought to find alternative, documentary sources of data, including referring to the planning statements prepared by developers, and their responses to comments received on proposals, minutes of internal meetings of neighbourhood forums, the public consultation responses of local people and groups, consultation responses of neighbourhood forums on planning applications, and interviews within local press. Such information as supplementary data played a key role in supplementing and triangulating the data. Interview material was also triangulated with local press coverage and official documentation, however, a wider range of perspectives may have deepened the analysis further. The project was ultimately able to explore the views and interpretations of a range of actors involved in the process of decision-making in order to investigate the NDPs from various angles (see section 4.4.3).

8.4 Contributions to knowledge

This thesis has sought to contribute to knowledge empirically, methodologically and theoretically and has applicability to other plans in different contexts. In terms of the core empirical contribution. Chapter 2 reviewed a wide range of literature with respect to the production of statutory NDPs. Prior to the PhD, the literature had mostly addressed the emergence of neighbourhood planning and preparation of NDPs with a smaller number of studies having focused on the outcomes of NDPs, particularly with regard to housing delivery. There was a lack of empirical research on the role and work of NDPs between preparation and outcomes. That gap in the research is important, since the role and weight given to NDP policies is only tested through its application (or lack of application) in subsequent planning practice; and since there are substantial questions with regard to the legacy of processes of NDP, especially given their voluntaristic and non-statutory nature. For example, are NDPs reviewed and updated? Who is responsible for ensuring that NDPs are given sufficient weight? Do they lead to wider local empowerment, knowledge development or engagement around the planning process? This thesis has addressed the crucial gap of 'neighbourhood planning

(NP) after the plan' by addressing the performance, power and impact of NDPs post-adoption. Based on quantitative and qualitative data, in the light of the theoretical framework, chapter 5 and 6 have provided plenty of empirical evidence and insights with regard to the implementation of NDPs and the complex ways in which they interact the environments they are seeking to shape and influence. Thus, this thesis introduces a new dimension into debates on neighbourhood planning (NP) and NDPs.

Secondly, this thesis has developed and applied a novel research methodology for researching what happens to plans after preparation of plans, the significance of which extends beyond NP to planning more generally. As set out in Chapter 4, there has been very limited systematic research into the role of plans after plan preparation. In terms of NP, the research methodology introduced an important mixed methods dimension to research. While most previous papers for NP tended to use qualitative data such as interviews and/or documents, the PhD research employed a multiple embedded case study approach uniquely with the mixed qualitative and quantitative methods. This research design comprised interviews, embedded practical cases study and quantitative analysis for exploring four cases and the three types of resources were triangulated and supplemented by each other, as discussed in Chapter 4. The mixed methods were beneficial to comprehensively explore the impact of the NDP from various angles. The quantitative data for this research is particularly valuable to identify how NDPs are 'formally' used in practice, focusing on actual behaviours of actors beyond statements of interviewees. Thus, this thesis provides a distinctive and broad methodological tool to investigate the perception of actors, their actual behaviours, and the formal use of NDPs during the implementation stages in practice. In this respect, this methodology can be used in exploring the implementation and use of other NDPs and other types or tiers plans.

In terms of theoretical contribution. This research employs and reworks the concept of the communicative work of development plans proposed by Healey (1993) as a conceptual and theoretical tool. The original idea had been relatively under-developed by Healey and not widely applied by others, while it offered a productive means of analysing the nature and performance of a development plan in the interactive contexts in which it operates. For the PhD study, this concept was extended to understand the nature and influence of a development plan within its continuing and interactive contexts. As discussed in Chapter 3,

Healey's original work primarily focused on a reading of the textual language and internal meaning and messages 'within' plans themselves. This thesis has aimed to extend the concept to consider the actual 'performance' of a development plan within its real social context. The ways 'adopted' development plans continue to interact with their external contexts shapes the power and influence they exercise. That is, this thesis has aimed to scrutinise the 'interactional' and persuasive roles of development plans and the effectiveness of NDPs in the real world of practice, where external conditions are relatively more crucial to the performativity of plans than the mere existence of policies in NDPs. The thesis has consequently reintroduced and widened the theoretical framework to analyse the 'actual' performance of development plans and their interactive relationships with the external environments surrounding them and which they seek to influence. Furthermore, the research has further extended the concept by reflecting and adjusting to the particularities and attributes of 'NDPs' as a relatively new form of community-led plans. In this respect, the thesis suggests there is considerable further potential to use and develop framework to understand the role and work of other types (or tiers) of plans post-adoption.

Finally, the results of this thesis have boarder applicability to other plans and contexts. This study identifies the role and status of NDPs within the distinctive planning system in England and explores the interaction of the plans with their interactional external environmental surrounding them. In consequence, the research revealed and emphasised that the interaction of plans significantly influences the work and effectiveness of plans in practice beyond merely the quality of plans. Thus, by understanding the interaction between plans and their external environments within particular planning mechanism and considering those who use the plans in practice, planners may make and develop the plans to be more influential in realising the aim, objectives and aspirations which are articulated within the plans. In this respect, the results of this research can be reflected and applied in exploring or developing plans in other planning contexts such as other NDPs in other local contexts, other tiers of plans in England and plans in other international contexts.

8.5 Implications for theory and practice

This section briefly explores the implications for theory and practice in planning that have emerged from the thesis. The research has provided deeper insight into the work of NDPs and their interactive power and influence. In turn this insight can provide practical guidelines for those who produce or revise NDPs in order to improve the effectiveness of NDPs by enhancing their interactive qualities within the planning and decision-making system in England.

Given the nature of development plans, the quality of policies is a significant factor shaping their impact. Chapter 5 and 6 clearly described how specific policies, such as site allocations or design guidance for identified types of development are normally more influential according to both quantitative and qualitative empirical evidence. It is also important that NDPs seek to add value to the local plan by focusing on locally-specific affairs at the community level, rather than merely duplicating existing local plan policies which undermines the effectiveness of NDPs, especially in the eyes of the planning officers. Clarity and precision in phrasing are also important to reduce (sometimes wilful) misinterpretation and to enable NDPs to convey messages intact to those who read and use the plans. The skills and expertise this requires may challenge many NPGs but there is evidence that they are learning by doing to improve plans when they are revised.

The discretionary planning system in England presents some unique challenges for the effectiveness of NDPs, creating considerable uncertainty and variation in influence depending on the perspectives and attitudes of actors. In this regard, NPGs need to keep considering 'who' will read and use their adopted NDPs. In principle, NDPs as part of development have to be taken into account in the production and assessment of planning applications, but there is no guarantee about the extent to which NDPs are accorded weight in decision-making or whether that will be apportioned equally or in the ways NPGs initially intended. During the preparation of NDPs, NPGs should be aware that the key actors who will use NDPs are mainly developers as applicants and local planning authorities (LPAs) as decision-makers – policies should therefore be targeted to sending messages they will understand.

Post-preparation, NPGs also need to monitor changing planning policies and ensure these are reflected in subsequent iterations of NDPs. This requirement for monitoring and ongoing

revision can be a considerable burden to them. Chapters 2, 5 and 6 described how NDPs interact with local plans within the hierarchical planning system in England, and this relationship in turn shapes the impact and power of NDPs. NPGs should be aware of the game of 'leapfrog' produced by precedence and information discrepancies that emerge from the time-gaps between NDPs, local plans and national policy guidance which can impact significantly on the determination of applications. Thus, NPGs really need to review and modify their NDPs to maintain status and validity.

Moreover, NPGs can use their soft power to be more involved in subsequent development in two key ways: first, by responding to consultation on planning applications and fostering close relationships with developers and decision-makers. Empirical data in Chapters 5 and 6 illustrated that commenting on proposals can increase the influence of NDPs in the determination of planning applications by reminding actors to consider specific policies and take them into account. When this happens, NDPs can help draw developers and decision-makers to pay attention to key issues addressed in policies, ensuring they are more carefully addressed. Similarly, seeking out lines of communication with actors may affect their perception and stance towards NDPs. It should be noted that neither NDPs or NPGs have power to shape decisions, their actions and behaviours are not therefore determinative factors in decision-making. However, despite this the thesis has clearly illustrated that their activities are widely regarded as a positive catalyst by both NPGs and those involved in determination of proposals. Thus, it is hoped the thesis can enable NPGs to enter into the production of NDPs with a clearer idea both of what works and of the ongoing commitment they are likely to be making.

8.6 Future research and conclusion

This research has provided empirical evidence with regard to the work and effectiveness of NDPs within the external environment they seek to influence. However, there is considerable scope for further research to develop understanding of the nature and attributes of NDPs in broader ways. This section proposes four ideas as directions for further research. Firstly, it would be useful to know more about the ways local people interact with NDPs post-adoption,

as discussed in section 8.3. Given the nature of NDPs, which aim to enable people to influence the growth and development of their local area, such evidence would add substantial insight regarding the necessity and validity of NDPs from the views of those they directly affect. Secondly, if possible, it would be worthwhile to further explore the invisible power of NDPs. NDPs provide guidance to shape the types of development and simultaneously attempt to preserve areas from unwanted development. Some developers and agents' schemes have been revised (Chapter 5.5.5) and consequently potential applicants may hesitate, amend or even withdraw their proposals based on particular policies in NDPs (Chapter 7.3). This invisible power as gatekeepers would be useful to understand the full impact of NDPs.

Thirdly, it would be worthwhile to explore those who choose not to revise NDPs or, notably, extend the status of neighbourhood forums. The need for the adopted NDP to be revised 'has become imperative', normally every five years, though there is no formal requirement to review them (Edwards, 2020, p. 148). Notably, neighbourhood forums need to be redesignated by the LPA every five years, if desired (Locality, 2018). Chapter 5 and 6 illustrated that neighbourhood planning groups across the four cases all sought to revise or were preparing to review their NDPs to maintain the status and enhance the impact of the plan. In this regard, it would provide valuable insight to further explore perceptions of the value of NDPs to local areas and communities from a different angle by investigating counter-examples. Lastly, it will be important to continue exploring the role of NDPs 'in' a constantly changing planning context. As the adopted plans continues to interact with external environment (Healey, 1993), NDPs should be considered 'part of a dynamic, complex and changing system' (Salter, Parker, and Wargent, 2022, pp. 15-16; see also Parker, Street, and Wargent, 2018). Government policies have continued to change after completion of the empirical work on which this thesis is based and they are likely to continue to do so. Such policies may consequently enhance or undermine the power of both NDPs and NPGs. Since the performance of NDPs is shaped within a wider hierarchy of planning policies, it would be valuable to track and reflect 'the latest' higher-tier planning policies in order to understand the status and role of NPGs and the work and impact of their NDPs within the changed and contemporary planning context.

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Appendices

Appendix 1: Participant Information Sheet

The impact of neighbourhood plans on planning decisions – Information Sheet

Department of Urban Studies and Planning, University of Sheffield

Introduction

I am asking you to participate in my PhD research on Neighbourhood Plans. This information sheet explains more about the project and your participation. Before you decide whether or not to participate, it is important for you to understand why the research is being done and what it will involve. Please take time to read the following information carefully and discuss it with others if you wish. Please take time to decide whether or not you wish to take part.

The PhD

The purpose of the PhD study is to investigate the work and impact of Neighbourhood Development Plans on implementation. The PhD involves four case studies of neighbourhood planning chosen to reflect different contexts for plan preparation and implementation, each case study will involve: interviews with key individuals, stakeholders and organisations involved in neighbourhood plan preparation and subsequent planning decisions and a review of planning decisions relevant to the neighbourhood plan. Each case study will involve 10-15 interviews.

INTERVIEW PROCESS AND QUESTIONS

The questions in this interview are related to your experience and perceptions of Neighbourhood Development Plans on implementation. The effectiveness of work of Neighbourhood Development Plans depends on the perception of all relevant actors, when they interpret the plans for preparation, applications, and decisions. The semi-structured interview will be conducted for about 30 mins at a time and place of your choice. The interviews will be recorded and transcribed for data analysis. Whilst there are no immediate benefits for those people participating in the project, it is hoped that this work will help develop understanding of how Neighbourhood Development Plans can work effectively and practically for your and other communities.

CONFIDENTIALITY AND ANONYMITY

Identifiable personal data will be kept strictly confidential and will only be accessible to members of the research team such as supervisors. Your personal data are managed according to data protection principles, and will be anonymised wherever possible including in any reports or publications unless you have given your explicit consent. According to data protection legislation, I am

required to inform you that the legal basis I am applying is that 'processing is necessary for the performance of a task carried out in the public interest' (Article 6(1)(e), see more on the University's Privacy Notice). The University will act as the Data Controller for this study, and this project has been ethically approved via the University of Sheffield's Ethics Review Procedure.

I appreciate your time and consideration in advance. Once you decide to take part, you will be given this information sheet to keep, be asked to sign a consent form and will be able to withdraw at any time. If you wish to obtain any further information about the project or have any complaints, please do not hesitate to contact me. If you feel the questions or complaint has not been handled to your satisfaction, please contact my project Supervisors or further the Head of Department.

CONTACTS

Project contact details for further information:

Researcher:

Supervisors:

Head of Department:

Appendix 2: Participant Consent Form

The impact of neighbourhood plans on planning decisions - Consent Form

<i>Please tick the appropriate boxes</i>	Yes	No
Taking Part in the Project		
I have read and understood the project information sheet or the project has been fully explained to me. (If you will answer No to this question please do not proceed with this consent form until you are fully aware of what your participation in the project will mean.)	<input type="checkbox"/>	<input type="checkbox"/>
I have been given the opportunity to ask questions about the project.	<input type="checkbox"/>	<input type="checkbox"/>
I agree to take part in the project. I understand that taking part in the project will include being interviewed and being recorded by audio; and that my response will be transcribed.	<input type="checkbox"/>	<input type="checkbox"/>
I understand that my taking part is voluntary and that I can withdraw from the study at any time; I do not have to give any reasons for why I no longer want to take part and there will be no adverse consequences if I choose to withdraw.	<input type="checkbox"/>	<input type="checkbox"/>
How my information will be used during and after the project		
I understand my personal details such as name, phone number, address and email address etc. will not be revealed to people outside the project.	<input type="checkbox"/>	<input type="checkbox"/>
I understand and agree that my words may be quoted in publications, reports, web pages, and other research outputs. I understand that I will not be named in these outputs unless I specifically request this.	<input type="checkbox"/>	<input type="checkbox"/>
I understand and agree that other authorised researchers will have access to this data only if they agree to preserve the confidentiality of the information as requested in this form.	<input type="checkbox"/>	<input type="checkbox"/>
I understand and agree that other authorised researchers may use my data in publications, reports, web pages, and other research outputs, only if they agree to preserve the confidentiality of the information as requested in this form.	<input type="checkbox"/>	<input type="checkbox"/>
I give permission for the response of the interview that I provide to be deposited in Cloud storage provided from the University of Sheffield and/or external portable storage devices so it can be used for future research and learning	<input type="checkbox"/>	<input type="checkbox"/>
So that the information you provide can be used legally by the researchers		
I agree to assign the copyright I hold in any materials generated as part of this project to The University of Sheffield.	<input type="checkbox"/>	<input type="checkbox"/>

Name of participant [printed]

Signature

Date

Name of Researcher [printed]

Signature

Date

Project contact details for further information:

Researcher:

Supervisors:

Head of Department:

Appendix 3: List of interview participants

#	Neighbourhood Development Plan	Local Authority	Role	Date (D/M/Y)
1	Kentish Town and Hampstead	Camden	Ward Councillor, Chair of Planning Committee	10/03/2020
2	Kentish Town and Hampstead	Camden	Planning Committee	11/03/2020
3	Kentish Town and Hampstead	Camden	Planning Committee	29/02/2020
4	Kentish Town and Hampstead	Camden	Planning officer	13/11/2020
5	Kentish Town and Hampstead	Camden	Planning officer	05/11/2020
6	Kentish Town and Hampstead	Camden	Planning officer	15/02/2021
7	Kentish Town and Hampstead	Camden	Planning officer	01/06/2021
8	Kentish Town and Hampstead	Camden	Planning officer	02/07/2021
9	Kentish Town and Hampstead	Camden	Planning officer	09/07/2021
10	Kentish Town and Hampstead	Camden	Planning officer	13/07/2021
11	Hampstead	Camden	Secretary of the HNF	24/11/2020
12	Hampstead	Camden	Vice Chair of the HNF	26/11/2020
13	Hampstead	Camden	Treasurer of the HNF	05/05/2021
14	Olney and Newport Pagnell	Milton Keynes	Planning officer	23/04/2021
15	Olney and Newport Pagnell	Milton Keynes	Planning Officer	26/05/2021
16	Olney and Newport Pagnell	Milton Keynes	Planning Officer	25/06/2021
17	Olney and Newport Pagnell	Milton Keynes	Planning Officer	12/07/2021
18	Olney	Milton Keynes	Town Councillor	10/02/2021
19	Olney	Milton Keynes	Town Councillor	04/03/2020
20	Olney	Milton Keynes	Town Councillor	01/05/2021
21	Olney	Milton Keynes	Town Councillor	04/05/2021
22	Olney	Milton Keynes	Ward Councillor / Chair of Development Control Committee	20/02/2020
23	Olney	Milton Keynes	Applicant (Developer)	31/03/2020
24	Newport Pagnell	Milton Keynes	Town Councillor	02/02/2022
25	Newport Pagnell	Milton Keynes	Town Councillor	25/01/2022
26	Newport Pagnell	Milton Keynes	Town Councillor	24/01/2022
27	Chinnor	South Oxfordshire District	Ward Councillor	16/03/2020
28	Chinnor	South Oxfordshire District	Planning officer	03/03/2020
29	Old Market Quarter	Bristol	Planning Committee	02/03/2020

Abbreviations

CIL	Community Infrastructure Levy
DCLG	Department of Communities and Local Government
HMOs	Houses of Multiple Occupation
HNA	Hampstead Neighbourhood Area
HNF	Hampstead Neighbourhood Forum
HNP	Hampstead Neighbourhood Plan
KTNA	Kentish Town Neighbourhood Area
KTNF	Kentish Town Neighbourhood Forum
KTNP	Kentish Town Neighbourhood Plan
LA	Local Authority
LAPC	London Assembly Planning Committee
LPA	Local Planning Authority
MHCL	Ministry of Housing, Communities & Local Government
MoU	Memorandum of Understanding
NA	Neighbourhood Area
NDO	Neighbourhood Development Orders
NDP	Neighbourhood Development Plan
NF	Neighbourhood Forum
NP	Neighbourhood Planning
NPG	Neighbourhood Planning Group
NPNA	Newport Pagnell Neighbourhood Area
NPNP	Newport Pagnell Neighbourhood Plan
NPSG	Neighbourhood Plan Steering Group
ONP	Olney Town Neighbourhood Plan
ONA	Olney Town Neighbourhood Area
PAS	Planning Advisory Service