



## Urban Vision Enterprise

Town and Parish Council Planning Service

### Neighbourhood Plans

Implementation, Monitoring and Review

June 2025



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# 1. Introduction

## 1.1 Purpose of the Guide

This guide deals with the implementation, monitoring, and review of neighbourhood plans, once they have been ‘made’. Implementation is largely about the use of the Neighbourhood Plan in the development management process, as part of the statutory development plan.

There is no formal requirement to monitor or review neighbourhood plans, but it is good practice and helps to ensure that the neighbourhood plan remains relevant and effective.

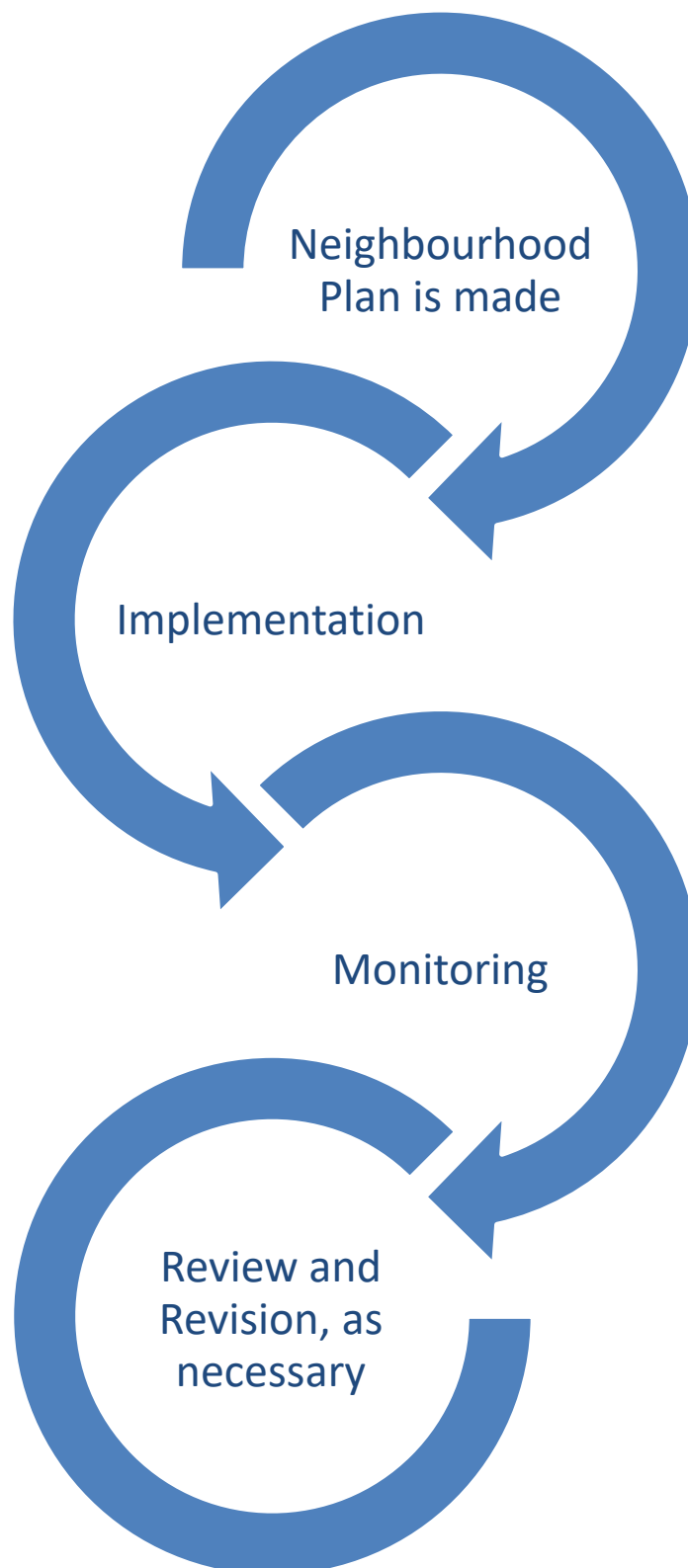
This guide is aimed at town and parish councils and neighbourhood forums and anyone else involved in the neighbourhood planning process.

## 1.2 Structure and Content of the Guide

Part 2 of the guide deals with implementation, including using the Plan in making representations on planning applications and appeals.

Part 3 deals with monitoring of the neighbourhood plan, including monitoring decisions on planning applications and appeals.

Part 4 deals with review and revision of neighbourhood plans. It is inevitable that neighbourhood plans will need to be updated from time to time, for example in response to changes in national planning policies.



**Figure 1: Cycle of implementation, monitoring, review and revision of neighbourhood plans.**

## 2. Implementation

### 2.1 What is meant by implementation and who is responsible?

Once a neighbourhood plan is made, it becomes part of the statutory development plan for the area, together with the local plan(s) and any strategic plan for the wider area.

Planning applications must by law be determined in accordance with the development plan, unless material considerations indicate otherwise. The local planning authority (LPA) has key responsibility in implementing the neighbourhood plan, by applying the policies through the development management process. Development management refers to the role of LPA in dealing with planning applications and other consents.

The role of neighbourhood plan bodies does not end once the Neighbourhood Plan is made. Town or parish councils or neighbourhood forums should refer to Neighbourhood Plan policies when making representations on planning applications.

Other people or local bodies could also use the Neighbourhood Plan policies in making representations on planning applications, for example civic societies, residents or local businesses.

Parish and town councils may also receive a proportion of any monies received through the Community Infrastructure Levy (CIL). Neighbourhood forums do not receive any CIL monies, but should be consulted on its use by the LPA.

### 2.3 Planning Applications

Planning applications relating to sites in the neighbourhood area should be monitored. This can be done by checking on-line lists of applications or signing up for notifications by email, where this is available. Schedule 1 of the Town and Country Planning Act 1990 was amended by the Neighbourhood Planning Act 2017 to require the LPA to notify parish councils of applications (or amendments to applications) in their area.

The LPA must take any representations received into account in making their decision, insofar as they relate to material planning considerations. This means that representations must relate to the use and development of land and any associated social, economic, and environmental impacts of development.

Representations can be used to explain how the neighbourhood plan policies apply to a development scheme. This is an opportunity to highlight where a scheme is compliant and non-compliant with the Neighbourhood Plan's policies.

National policies, local plan policies and policies of the strategic plan, where there is one, can also be used to support representations, where applicable.

LPAs are required to determine planning applications in accordance with the policies of the statutory development plan for the area, unless material considerations indicate otherwise. The statutory development plan comprises policies in strategic plans, local plans and neighbourhood plans. Where non-strategic policies conflict, the plan that was made or adopted more recently carries more weight.

## 2.4 Making Effective Representations

The following points may be useful in making sure that written representations on planning applications are as effective as possible:

- Include the name and address of the site and the planning application reference number in the title at the head of the letter.
- Start the letter by stating who is making the representations, for example a parish council, neighbourhood forum or other body. Make sure the letter includes contact details.
- Representations are more likely to be effective if they are clear, rational and balanced. Concise letters work best. It can be very tempting to include huge amounts of unnecessary information, but arguments can get lost in excessive detail. Less is more.
- The focus of representations should be on the development scheme itself. Comments on the developer, its staff or consultants should be avoided. Over-emotive or insulting language should also be avoided.
- Representations should address material planning considerations and avoid referring to non-planning matters. Planning is concerned with the use and development of land in the public interest. Material planning considerations could include a wide range of impacts (social, economic, environmental).
- Responses should highlight how the scheme meets policy requirements and where it does not. When objecting to a scheme, the specific reasons should be made clear. Where supporting a development proposal, it is useful to set out the positive impacts of the scheme and the benefits that it would deliver. It is useful to balance criticism of parts of a scheme with recognition of positive aspects.
- National and local or strategic plan policies can also be used, including policies in the National Planning Policy Framework, Planning Practice Guidance, the National Design Guide and the adopted and/or emerging local plan for the

area. These should all be accessible through Government and local authority web sites.

- Avoid basing comments on very subjective matters, such as personal stylistic preferences.
- Where policy requirements are not being met, constructive suggestions for modifications and improvement of the scheme may be helpful, where the concern is over specific aspects of a scheme rather than the principle of the development.
- It is useful to highlight matters that could be dealt with through simple amendments to the plans or through use of planning conditions. For example, conditions could be used to control hours of operation of commercial premises, where there are nearby residential properties and concerns over amenity.
- Where possible, support arguments with relevant evidence. For example, this could include evidence on housing need, a conservation area character appraisal or data on traffic capacity and safety. However, it is useful to be selective. Over-burdening the recipient with material of questionable relevance could deflect focus from more relevant issues.
- Use simple and accessible language and a clear written style. Avoid jargon, over-academic writing styles or over-long and complex sentences. Make clear and direct points.
- Undertake a spelling and grammar check on the letter. Where possible, get somebody else to proof-read the letter.



## Good and bad examples of representations:

### Good:

*We object to the proposed development. The scale and massing of this scheme are out of character with the surrounding context. The conservation area character appraisal identifies the domestic scale of properties as a key part of the area's character. The scheme would harm the character and appearance of the conservation area and be contrary to policy CONS11 of the Village Neighbourhood Plan and also policy DC5 of the Local Plan.*

*We do recognise the need for smaller new housing and recognise the innovative 'green' aspects of the design. By breaking down the massing differently, the scheme could be made to fit in with the local context. We would be happy to work with the developer and local planning authority to achieve this.*

The above response sets out the issues behind the objection, with reference to policies and making constructive suggestions for improvement.

### Bad:

*We object strongly to this planning application. We don't like the look of it. It is modern and ugly. Our residents pay council tax and have made clear that they don't like change and don't want any new development. The developer is only proposing this housing to make a profit.*

This objection is vague and negative, makes no reference to policy and includes irrelevant issues.

**Figure 2: Good and Bad Representations**



## 2.5 Working with Developers

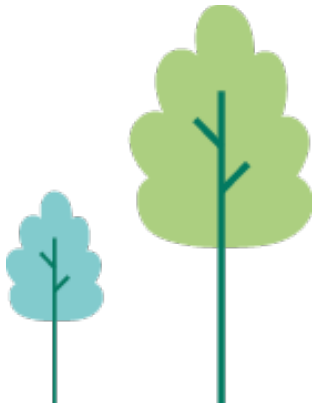
Neighbourhood plan bodies can seek to engage directly with developers. For example, they could ask to attend LPA developer forums, where they exist. Or they can contact developers directly, where they are aware of their interest in local sites. If this is done in a positive way, it can influence development schemes for the better.

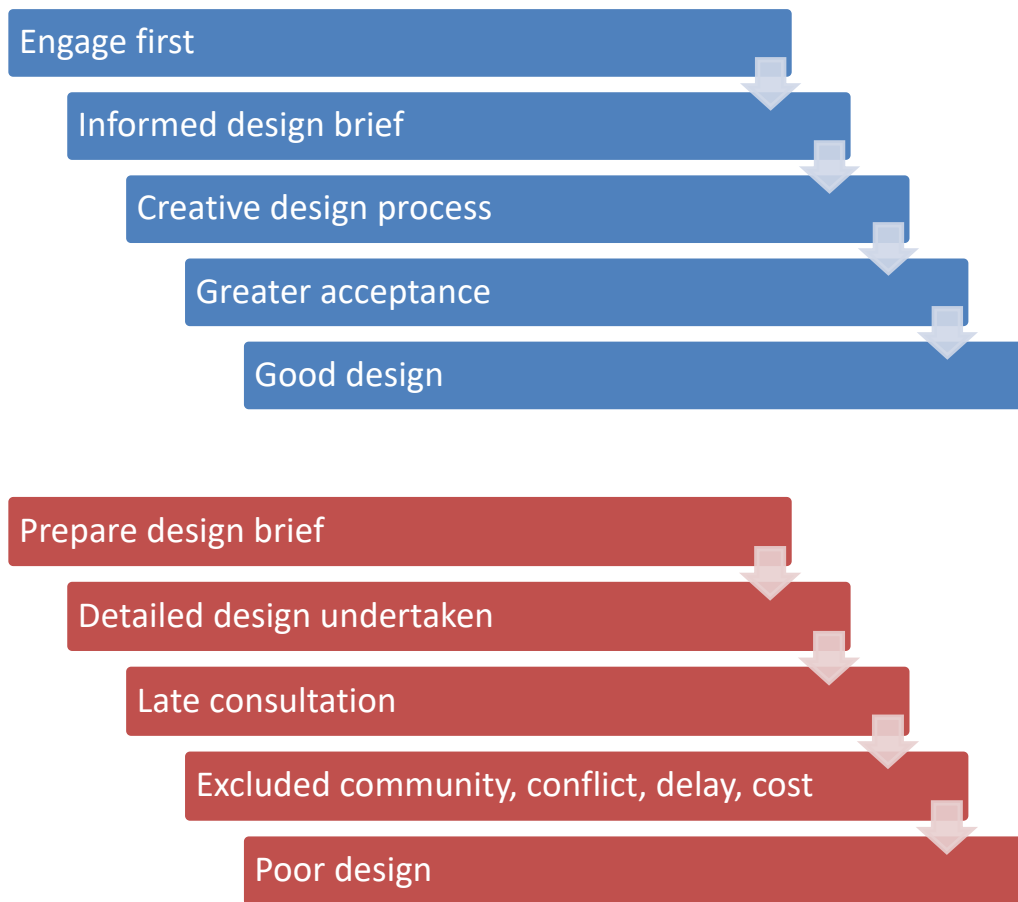
Where engagement with developers is being sought, it is advisable to prepare a protocol or policy, setting out how engagement will be undertaken, who to involve, how to record meetings and avoiding conflicts of interest.

Early engagement is best. It becomes more and more difficult to influence schemes as the design process advances, as more time and money has been invested. Pre-design engagement is most likely to be effective.

Neighbourhood plan bodies could offer to help developers to engage with the wider community at an early stage. Early engagement allows for community knowledge and aspirations to inform the design brief and design process. Late engagement tends to focus on limited tweaks and surface aesthetics.

Early and effective community engagement can help in avoiding conflict at later stages, with the associated cost and delay. Some experienced developers understand this, whilst others are more reluctant to engage. A constructive dialogue can help to convince developers of the benefits of community engagement.





**Figure 3: Good (top) and poor (bottom) practice in engaging with communities in the design process.**

## 2.6 Community Infrastructure Levy Expenditure

Not all areas have a Community Infrastructure Levy (CIL). In many areas, there are viability challenges, even without a CIL. The CIL works most effectively in areas with high levels of growth. For areas in need of regeneration and economic development, with viability challenges, a CIL may raise little or no money.

Where there is a CIL, 25% of monies raised from development within a neighbourhood area should be paid to the town or parish council. This gives them a direct role in providing infrastructure, using CIL monies and possibly other funds. This role can be used to address infrastructure deficiencies (including community and transport infrastructure).

Neighbourhood Forums do not receive CIL monies, but local authorities are asked to agree expenditure with communities and to match priorities expressed in

neighbourhood plans. So, whilst there is no direct role in negotiating or administering Section 106 monetary receipts, there could be a constructive dialogue with the LPA.

## 2.7 Skills and Training

Once the Neighbourhood Plan is ‘made’ it may be useful to arrange a training/briefing session with local authority officers so that the neighbourhood plan body can explain the policies.

## 2.8 Local Plan Representations

In addition to representations on planning applications, neighbourhood planning bodies can make representations on emerging local plans, including on any strategic site allocations. It is important to continue to engage with emerging local policy, even after the neighbourhood plan is made.



## 3. Monitoring

### 3.1 What is meant by monitoring and who is responsible?

The ‘made’ neighbourhood plan should be monitored, to assess how it is being used and how effective the policies are in practice. Other changes that could affect the Neighbourhood Plan should also be monitored.

Monitoring could include:

- how the policies are being applied and how they are shaping decisions on planning applications (development management);
- level of monies raised through the Community Infrastructure Levy (CIL) and how such monies are being used;
- whether plan aims are being achieved;
- whether there is a five-year housing land supply in the wider district;
- changes to national policy;
- revision of the Local Plan;
- other significant changes in the local area.

Consideration of any of these factors could indicate a need to revise a neighbourhood plan.

Many early neighbourhood plans suffer from vague and generic policies, which sometimes added little or nothing to existing national and local policies. For example, heritage policies or natural environment policies that merely repeat the wording in national policy have no real effect. This could be a factor in deciding to revise the Plan, providing the opportunity to draft more locally specific policies.

Monitoring can be done by the neighbourhood planning group and/or other local stakeholders such as civic societies (for example, if there is no longer a neighbourhood forum). Local stakeholders could then seek to gain the designation of a new Neighbourhood Forum.

The local planning authority has no power to modify the neighbourhood plan, but can provide feedback to neighbourhood plan bodies.

Those involved with monitoring would need to be familiar with the neighbourhood plan’s policies, to assess how well they are being applied.

Monitoring could also look at planning conditions, where planning permission is granted. Conditions may be a direct response to neighbourhood plan policies. Similarly, where a scheme is refused, the reasons for refusal should be examined. These may make explicit mention of neighbourhood plan policies.

Where development is undertaken without planning permission being obtained, and where such development contravenes neighbourhood plan policies, it will be useful to monitor whether enforcement action is being taken by the LPA. Where action is not being taken, this could be raised with the LPA to clarify the reason.

### 3.2 Effectiveness of Policies in Development Management

Assessing the effectiveness of neighbourhood plan policies in the development management process will involve monitoring of planning decisions, as set out in the following table.

What to Monitor	Activity
Officer reports	Where decisions are taken by planning committees, an officer's report will advise elected members and make recommendations. Such reports should set out how the policies of the neighbourhood plan apply. Where decisions are delegated to senior officers, there should still normally be a short report with recommendations on the file.
Enforcement activities	Where unauthorised works take place and they breach a neighbourhood plan's policies, it is useful to monitor whether the LPA takes enforcement action and to consider the reasons for doing so or not doing so.
Appeal decisions	Where planning applications go to appeal, the decision notice should set out how the neighbourhood plan's policies have been applied.
Planning decision notices	Planning decision notices will state that a scheme has been approved and set out any conditions, or will state the reasons why a scheme has been refused.

**Figure 4: What to Monitor**

It may also be useful to attend planning committee meetings, though many decisions are made under delegated powers. A constructive dialogue with the LPA will be a useful means to gain feedback on the plan's policies from a development management perspective.

When monitoring decisions, the following questions should be asked:

**Policy compliance:** Are planning applications being determined in accordance with neighbourhood plan policies?

**Reasons for departing from policies:** If decisions depart from neighbourhood plan policies, are clear and valid planning reasons for doing so being given in officer reports? If not, there could be questions over whether the decisions were taken lawfully.

**Effectiveness:** Are policies proving to be effective in shaping local authority decisions and appeal decisions? If policies are proving to be ineffective, then why?

**Matters not addressed by policies:** Are there any significant issues arising that are not covered by Neighbourhood Plan policies?

The clearer and more specific a policy is, the easier it should be to monitor decisions against that policy. The hope is that policies are being applied consistently and proving to be effective.

The starting assumption would be that decisions are being made in a proper and lawful way. If monitoring of decisions and officer reports raises any doubts over this, the first action should be to bring this to the attention of the LPA in a letter. This could highlight where a departure from neighbourhood planning policy has been made, but the 'material considerations' that have underpinned that departure have not been made clear.

The problem may be with the neighbourhood plan itself. Reasons why a neighbourhood plan may be ineffective in practice include:

- policies are vague or comprise aspirations, rather than providing a clear test against which development proposals can be assessed;
- issues are identified in the plan, but are not reflected in the actual content of policies;
- policies repeat or refer to national or local plan policy, so are inconsequential;
- policies are being interpreted differently than intended, which may be due to lack of clarity or ambiguity.

Any of these issues could indicate a need to amend or redraft the policies of the neighbourhood plan.

### 3.3 Infrastructure Receipts

Not all areas have a community infrastructure levy (CIL) and even where there is CIL, it may raise limited funds.

Where there is a CIL, the level of income generation can be monitored. The Local Planning Authority should have the data to enable this. For parish councils, where there is a made neighbourhood plan, part of the CIL should be passed on to them.

For monies raised through CIL or Section 106, it may also be useful to monitor how it is being used in terms of the kind of infrastructure that is being funded. Some neighbourhood plans include priorities for infrastructure, so these could be compared to the actual expenditure. If the prioritised types of infrastructure are not being funded, then this could be discussed with the LPA.

### 3.4 Achieving Neighbourhood Plan Aims

Monitoring could also include consideration of whether the overall aims of a neighbourhood plan are being achieved. This is not just about individual decisions, but considering their collective impacts and outcomes. Considering whether aims are being achieved, is likely to require a more strategic and area-wide perspective.

Neighbourhood plans should help to achieve sustainable development, so the overall question is whether the plan is delivering or has delivered growth and whether that growth has been sustainable, considering social, economic and environmental impacts and outcomes and the interests of current and future generations.

### 3.5 Changes to Policy and Guidance

Changes to national policies and guidance and/or Local Plan policies should be monitored. These will erode the policies of the neighbourhood plan, if the new policies and guidance have a different emphasis or require a different approach.

National policy and guidance are material consideration in planning decisions, so could justify a departure from the policies of a neighbourhood plan.

New Local Plans could set different requirements to the Neighbourhood Plan, or make strategic site allocations. This could make revision of the Neighbourhood Plan desirable.

Changes to legislation should also be monitored. For example, changes to permitted development rights could remove the need to apply for planning permission for

certain types of development. This could render some Neighbourhood Plan policies wholly or partially redundant.

The Local Planning Authority has powers to issue an Article 4 Direction to remove or partially remove permitted development rights. If there would be benefits in removing permitted development rights for an area, this could be raised with the LPA.

Sometimes, decisions made by the courts can clarify how existing law should be interpreted (caselaw).

### 3.8 Changing Local Context and Evidence

Monitoring could also look at changes in the local area. More recent evidence on the area may indicate significant changes in economic, social and environmental conditions (as happened as a consequence of the COVID pandemic). Such changes could include:

- significant new employers moving into or out of the area;
- changes in work patterns, such as increased home working;
- new or improved infrastructure;
- opening or closure of larger shops or the collective impact of smaller shop openings or closures;
- significant new development;
- house price increases or stagnation and viability challenges;
- population changes and trends;
- environmental changes and challenges.

Some changes may be longer-term and more incremental in nature, for example longer-term socio-economic trends.



## 4. Review and Revision

### 4.1 Review, revision and who is responsible

Neighbourhood Plans, like all planning policy documents, benefit from being reviewed and revised from time-to-time, to reflect changing contexts, changing needs or to address issues around effectiveness. As stated previously, some neighbourhood plans suffer from vague or generic policies.

The monitoring process described in the previous chapter should give an indication of when review of the Neighbourhood Plan is necessary.

The decision to revise a neighbourhood plan and subsequent actions to achieve this can only be done by the Neighbourhood Plan qualifying bodies (town or parish councils or neighbourhood forums).

If a previous neighbourhood forum has expired (5 years from designation), then a new forum would need to be designated. The neighbourhood area designation survives, so re-designation of the area is not necessary, unless changes to the boundary are proposed (for example if the parish boundary has changed).

### 4.2 Reviewing the Neighbourhood Plan

Monitoring should be continual. It is good practice to write into the neighbourhood plan how it will be monitored and reviewed. Preparation of an annual or regular monitoring report may be a useful approach.

Monitoring may indicate a need for the Neighbourhood Plan to be reviewed, based on various factors, as described in Chapter 3 of this document and the following checklist.

**Effectiveness:** Consideration of the effectiveness of the existing plan may be assessed through monitoring of planning decisions. Where a neighbourhood plan is not having the desired impact, this may indicate a need for redrafting of policies or need for additional policies.

**National Legislation and Policy:** Planning legislation, policy and guidance is amended frequently. Such changes should be monitored. They may have a positive or negative impact on the policies of the neighbourhood plan. National policy may be a 'material consideration' that may justify a departure from certain neighbourhood plan policies.

**Local Policy:** As with changes to national policy, changes to local policy through revision of the local plan or strategic plan may have an impact on certain neighbourhood plan policies. Where local plan and neighbourhood plan policies

differ on non-strategic matters, the later plan carries more weight. So, the impact of adoption of a new Local Plan would need to be considered carefully.

**Local Circumstances and Evidence:** Changing local circumstances could include economic, social or environmental changes. New evidence should be taken into account to identify and assess the impact of local changes.

**Local opinion:** Continuing community and stakeholder engagement may highlight local issues or concerns that may influence a decision on whether or not to revise the neighbourhood plan.

### 4.3 Revision of the neighbourhood plan

The proposed revision of the neighbourhood plan should be publicised, so that the community and stakeholders are aware of why it is being revised and have an opportunity to participate.

It would be necessary to update the evidence base for the neighbourhood plan, identifying the most recent data and evidence that is relevant to the policies (for example, census data or housing needs assessment).

Revision of the Plan could involve editing and updating of the document, or a more radical restructuring and comprehensive redrafting of policies.

Additional site allocations and Local Green Space designations could be considered, where necessary.

### 4.4 Statutory process - Options

Where a neighbourhood plan is proposed to be revised, there are certain options in terms of statutory process, depending on the extent of that revision.

**Minor Changes and Corrections:** Minor (non-material) updates that would not materially affect policies may be made by the LPA, with consent from the neighbourhood planning group. In these circumstances, there is no need to repeat Regulation 14 consultation, examination and the referendum. Similar provisions exist for correcting errors in a plan.

**Modifications that do not materially affect policies:** If a group wish to make modifications that do materially affect the policies in the neighbourhood plan, the plan will need to go through the later stages of the statutory process, from pre-submission consultation (Regulation 14) onwards, although a referendum may not be required (this is explained later in this section).

**Modifications that would materially affect policies:** If updates are proposed by a group that would materially affect policies, there are certain additional requirements. These are:

- at the Regulation 14 consultation stage (pre-submission) the group must state whether it believes that the modifications are so significant or substantial as to change the nature of the plan, giving reasons;
- when sending the plan to the independent examiner, the LPA must state whether it believes that the modifications are so significant or substantial as to change the nature of the plan, giving reasons. A copy of the original plan must also be submitted to the independent examiner;
- the examiner will then decide whether the modifications proposed change the nature of the plan and the group must decide whether to proceed with the examination.

A referendum is not required if an examiner decides that the modifications are not so significant or substantial as to change the nature of the plan and would meet the basic conditions (with modifications if necessary). In this circumstance, an LPA must make the plan within 5 weeks of receiving the examiner's report (or as agreed with the group).

However, if the examiner finds that proposed modifications do change the nature of the plan, the LPA will need to publicise and consider the examiner's report in the same way as for a new neighbourhood plan and a referendum would be required.

## 5. About Urban Vision Enterprise

### 5.1 Experience and Services

Urban Vision Enterprise (UVE) is a professional planning consultancy providing services in planning, regeneration, economic development and third sector organisational development.

UVE provides a Town and Parish Council Planning Service in England.

UVE has supported well over 200 neighbourhood plans and can provide support at all stages of the process. This includes drafting of effective policies, site allocations and advice on legal compliance at all stages.

UVE also undertakes 'health checks' for existing Neighbourhood Plans and has supported numerous Neighbourhood Plan reviews.

UVE specialisms include:

- mediation and complex negotiations;
- neighbourhood planning;
- regeneration and economic development;
- town centres and high street recovery;
- housing growth, site selection and masterplanning;
- heritage-led regeneration and conservation;
- natural environment and blue and green infrastructure;
- urban design, including strategies, policies, guidance and design review;
- community and stakeholder engagement;
- statutory consultation (legal compliance);
- technical reports including housing need, site assessment and heritage studies;
- feasibility and viability studies and project business plans;
- training, continuing professional development (CPD) and education;
- preparing guidance and briefings;
- in person (verbal) and written evidence for Parliamentary committees;
- third sector (not-for-profit) organisational development, including strategy, operations, governance and business development.

UVE is ISO 9001 Registered. The practice is an IHBC recognised historic environment service provider (HESPR) and CPD provider.

### 5.2 Our Clients

Current and past clients include government and funding bodies, UK and national professional bodies and membership organisations, local authorities, town and parish

councils, neighbourhood forums and third sector (not-for-profit) organisations. These include the Heritage Lottery Fund, Locality, Royal Town Planning Institute, Institute of Historic Building Conservation, and the National Trust.

### 5.3 Contact

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