

Consultation Statement

2014-2020



1. Introduction

This Consultation Statement ¹ is submitted to Westminster City Council (WCC) together with the Queen's Park Community Council's (QPCC) proposed Neighbourhood Development Plan.

The Consultation Statement:

- a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- b) explains how they were consulted;
- c) summarises the main issues and concerns raised by the persons consulted; and
- d) describes how these issues and concerns have been considered or addressed in the proposed neighbourhood development plan.

¹ As required by the Neighbourhood Planning (General) Regulations 2012

This Statement is set out under the following headings:

2. About Queen's Park Community Council (QPCC)

3. Consultation activities 2014-2017

- a) Who were consulted
- b) How were they consulted
- c) Main issues and concerns raised
- d) How these issues and concerns have been considered or addressed

4. Pre-submission (Regulation 14) Consultation October-December 2017

- a) Who were consulted
- b) How were these bodies consulted
 - i/ Queen's Park residents
 - ii/ Statutory Bodies
 - iii/ Westminster City Council (WCC)
- c) Main issues and concerns raised
- d) How these issues and concerns have been considered or addressed

5. Appendices

- Appendix 1 Pre-Regulation 14 Consultation 2014-2017
- Appendix 2 On the Street
- Appendix 3 Consultation 2014-17 and Pre-Submission Consultation
- Appendix 4 QPCC response to Regulation 14 comments from WCC

2. About Queen's Park Community Council

Queen's Park Community Council (QPCC), the first community (or parish) council in London, was set up following a campaign and a local referendum in 2012. Elections are held every four years. The first 12 councillors were elected in May 2014, and our second election was held in May 2018. Our councillors are local residents with a wide range of experiences and views and the Community Council is not affiliated with particular political parties. Before being elected, none of the councillors had any prior knowledge or experience of planning matters.



The first 12 QPCC councillors.

The QPCC covers the WCC's Queen's Park ward, extending between Kilburn Lane to the north and west, Harrow Road in the south and Portnall Road in the east. It includes the Queen's Park and Mozart Estates.

Queen's Park is one of the most deprived wards in Westminster. The 2011 Census found that the ward had a population of 12,873 people, living in 5,138 households. Of these households, 23% were owner occupiers (or in shared ownership), 56% were social housing tenants and 20% were private rented tenants.²

Queen's Park's profile has meant that residents tend not to respond to formal public consultations. This is consistent with experience in other deprived areas. In 2019, Publica completed a piece of research entitled 'Neighbourhood Planning London Investigating Potential Areas Experiencing High Level Deprivation'³. This research found that nationally only 4% of neighbourhood plans are completed in areas of high-level deprivation, defined as in the 20% worst deprivation. Publica found that, on the whole, residents in these areas had little interest in the planning process and preferred to focus on social issues.

Therefore, QPCC explored a number of informal ways of involving local residents in the planning process and ensuring that a diverse range of voices are heard.

QPCC appointed Publica to help develop the plan. They were chosen because of the quality of their work and because of their knowledge of Westminster. They helped us with our consultation with residents when we hired a shop in the Harrow Road. They also completed the Neighbourhood Plan Background Document (Appendix 1 to the Neighbourhood Plan), which comprises an area survey, policy summary, details of early engagement, emerging vision, objectives, policies and projects. Publica has helped to write our final draft plan

Urban Vision, planning specialists, was appointed, to assist us in drafting the policies

² See: Queen's Park Ward Profile, May 2014, Westminster City Council

³ <https://www.trustforlondon.org.uk/publications/neighbourhood-planning-london-investigating-potential-areas-experiencing-high-levels-deprivation/>

QPCC has been supported with funding from Locality and The Great London Council (GLA).

3. Consultation activities 2014-2017

a) Who were consulted

QPCC consulted widely with local residents, voluntary sector organisations, Harrow Road retailers and WCC before preparing a draft Neighbourhood Plan ⁴.

b) How were they consulted

i/ Queens Park Summer Festivals: 2013 and 2014

Residents were consulted at an annual event which takes place on the first Saturday of August with an attendance of around 2,500 people. Every year there is a stall where the local community is consulted. QPCC usually consult around 100 people a year.

At the Summer Festival, QPCC used a variety of methods to ask residents their views of Queen's Park: post it notes on pictures, filling bottles with buttons showing preferences, answering the question 'if there was one thing that you could change.'



Residents at our Summer Festival.

⁴ For detailed information, please see Appendix 3

ii/ Voluntary sector: September 2013

In September 2013, in-depth interviews were conducted by The Paddington Development Trust with selected members of the voluntary sector and QPCC councillors in waiting.

iii/ On the Street: 23 June - 17 July 2015

A small pop up shop⁵ was opened in 548 Harrow Road for consultation with local residents. There were 350 visits to the shop during this time. QPCC also held 15 workshops covering a variety of subjects: Harrow Road, amenities for under 5's, young people and the over 50's, gardens and open spaces, accessibility and sustainability. People were invited to select their top priorities from a choice of 25. The first 10 all involved the Canal and the Harrow Road (see page 9-10 Appendix 2).



Invitation to "On the Street"

iv/ In-depth interviews with Harrow Road Retailers: August 2015

On behalf of QPCC and WCC, Publica conducted in-depth interviews with 15 Harrow Road retailers. This work led to the establishment of the Harrow Road Retailers Group, which has continued to work with QPCC to improve the area.

⁵ Please see Appendix 2

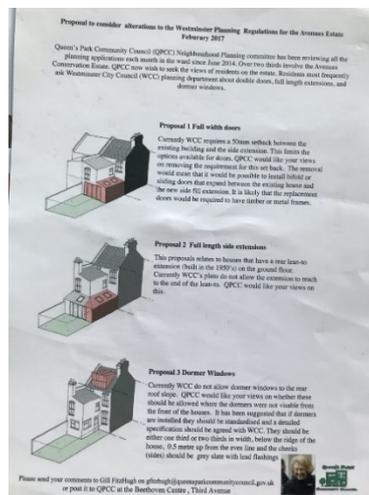


The Harrow Road Retailers Association

v/ Consultation with Queen's Park Conservation Area residents: February 2017

The QPCC planning working group reported that the following issues were regularly raised in planning applications for Queen's Park Conservation Area properties: full length side returns, dormer windows and full width back doors. It seemed that owners were unclear about what WCC considered to be acceptable development.

In response to this, QPCC formally consulted the 1,728 households within the Conservation Area about these issues and a leaflet was distributed by hand to all affected dwellings. Unfortunately, the response rate was poor, with only 34 household responding (around 2% of total). It was notable that, with one exception, all the respondents were owner-occupiers. Those that did respond were strongly in favour of allowing full length extensions and full width doors across side infill extensions. Respondents also supported allowing dormer windows, although 9 (out of 34) respondents strongly objected to this.



Consultation leaflet

vi/ Monthly QPCC Meetings

Through their monthly meetings, which started in May 2014, QPCC councillors have become aware of issues of concern to the local community. These issues are not often presented as planning matters, but some have had a planning dimension and have influenced the development of the Neighbourhood Plan.

Concern about the loss of community assets has been a significant issue in Queen's Park over the past 6 years. There is also an awareness of the need for more social or affordable housing in the area.

The future of the Queen's Park Meeting Hall

This Hall was built in 1882 as part of the Queen's Park Estate and is Grade II listed. The well-regarded All Stars Boxing Club is a long-standing tenant of this building. Concerns have been raised that the building might no longer be a community asset and QPCC made an application that it should be designated as an Asset of Community Value. This was done in January 2016. This experience directly influenced the development of Policy 2.



Queen's Park Meeting Hall

Amenities in Queen's Park: Avenues Youth Project

Following the decision to close the Jubilee Pools and Sports Centre, the residents of Queen's Park have become increasingly concerned about the possibility of losing even more buildings for community use. When the Avenues Youth Project faced a significant cut in its funding, QPCC was able to find ways to help secure its future. The potential loss of the Avenues Youth Project caused considerable disquiet amongst residents. The experience has led QPCC to want to limit further loss of community use and to propose Policy 1 regarding the future of Amenities.

Queen's Park Garden Hut

Local groups (including the Community and Maternity Champions) have been campaigning for play streets and for improvements to Queen's Park Gardens. They were keen that the Hut should be converted for use by the community and to include toilet facilities for use by staff and community groups. This is reflected in Policy 5.



Queen's Park Garden Hut

Harrow Road Open Space - Residential Development

Through its daily contact with local people, QPCC is aware of the need for more social and affordable housing in the area. Unfortunately, the area has few potential development sites. However, QPCC have identified an area called the Harrow Road Open Space as offering the potential for a small infill residential development, residential moorings for 8 canal boats, a pocket park and small community garden. This has informed our Policy 10.



*Location for proposed residential barges
(photograph taken from the opposite bank of the canal)*



Potential site for infill residential development

vii/ Westminster City Council

In January 2017, QPCC sent a draft of the Neighbourhood Plan to WCC for their comments. QPCC councillors met with WCC officers and details of WCC comments are set out in Appendix 4.

c) Main issues and concerns raised

The draft Neighbourhood Plan sent to WCC in January 2017 reflected the issues and concerns raised by local residents, voluntary organisations and Harrow Road retailers.

WCC provided detailed comments and suggestions, which are set out in Appendix 4. In summary, WCC suggested changes in the layout of the document as well as making specific comments about the following draft policies:

- **Policy 1: Amenities** should be amended to better reflect WCC's own policies
- **Policy 2: Queen's Park Hall** should be amended to remove mention of use of building for retail as this could be problematic.
- **Policy 3: Environment and Open Spaces** raised issues of conformity with WCC's City Plan policy S35
- **Policy 4: Residential Gardens** might be improved by being clearer and taking a more positive approach
- **Policy 5: Recreation and Open Spaces** did not develop further on existing development plan policy
- **Policy 7: Queen's Park Garden Hut** should be clearer about the justification for any loss of open space.
- **Policy 8: Design** should be reconsidered because as currently drafted it was weaker than City Plan policy S28.
- **Policy 9: Improving movement** appears to contradict the objective of Policy 11
- **Policy 10: Improving Cycling Structure** needed to be made clearer.

- **Policy 11: Improving Pedestrian Access** should be clarified.
- **Policy 12: Retail and Commercial Development** should be clearer about the about the part of the Harrow Road referred to and the policy should be re-written so that it is not misleading.
- **Policy 13: Grand Union Canal Narrow Boats** should be clearer about how to manage the impact of permanent moorings on the Canal. More details were needed.

d) How these issues and concerns have been considered or addressed

QPCC amended the Neighbourhood Plan in accordance with WCC's comments and changes were made to the layout. Full details of the amendments can be found in Appendix 4. However, in summary, these following changes were made:

- **Policy 1 Amenities** - the wording was changed to reflect WCC comments.
- **Policy 2 Queen's Park Hall** - the wording was changed to reflect WCC comments
- **Policy 3 Environment and Open Spaces** was deleted
- **Policy 4 Residential Gardens** was re-drafted and became Policy 3
- **Policy 5 Recreation and Open Spaces** was deleted
- **Policy 7 Queen's Park Gardens Hut** was clarified and became Policy 5
- **Policy 8 Design** was re-drafted and became the new Policy 6 Design
- **Policy 9 Improving Movement** was deleted
- **Policy 10 Improving Cycling Structure** was amended and re-drafted and became Policy 7
- **Policy 11 Improving Pedestrian Access** was re-drafted and became Policy 8
- **Policy 12 Retail and Commercial Development** became Policy 9 and was re-drafted
- **Policy 13 Grand Union Canal Narrow Boats** was re-drafted and became Policy 10

4. Pre-submission (Regulation 14) Consultation, October to December 2017

a) Who were consulted

Further to the amendments outlined above, a Neighbourhood Plan was prepared and QPCC consulted with Queen's Park residents, statutory bodies and Westminster City Council.

b) How were these bodies consulted

i/ Queen's Park Residents

Three versions of the Neighbourhood Plan were prepared for publication for all residents and stakeholders

A **very short version** was circulated in September 2017 in the Queen's Park Voice. The Voice is QPCC's newspaper that is published 3 times a year and is hand-delivered to every household. This summarised everything QPCC had done since 2014 and told residents how to obtain more information and how and where they could comment on the plan during the consultation period.



Front page of Queen's Park Voice, September 2017

A **20-page summary** of the Neighbourhood Plan was prepared and put onto QPCC's website. Printed copies of the summary were made available for collection in 4 key places: Library, the Beethoven Centre, the Avenues and in QPCC's offices.



Shortened version of the Neighbourhood Plan, September 2017

The full Neighbourhood Plan was made available on request and was also placed on QPCC's website.

In addition, Open Meetings for residents were arranged on Wednesday 1st November 2017 (1 - 4 pm) and Monday 13th November 2017 (6 - 8 pm). Further, a meeting was held on December 4th (9 - 10 am) to specifically discuss the proposals relating to the Harrow Road Open Space.

ii/ Statutory Bodies

In November 2017, the following statutory consultees were sent a letter and a copy of the Neighbourhood Plan:

- The Mayor of London (GLA)
- Westminster City Council: the Local Planning Authority
- Natural England
- The Environment Agency
- Historic England
- Transport for London
- The Coal Authority
- Highways England
- The Homes and Communities Agency
- Network Rail
- National Grid
- UK Power Networks
- The Marine Management Organisation
- Central London Clinical Commissioning Group

- Thames Water
- BT Openreach.

Responses were received from

- Westminster City Council: Local Planning Authority
- Natural England
- The Environment Agency
- Historic England
- Transport for London

iii/ Westminster City Council (WCC)

A further revised version of the Neighbourhood Plan was sent to Westminster City Council in May 2018 and officers responded in June 2018. QPCC has taken these comments into account.

c) Main issues and concerns raised

Despite the extensive publicity about the Neighbourhood Plan, QPCC received little formal response from residents. In a meeting, one resident suggested that it should be accepted that shops on Canal Terrace were unlikely to succeed and that the ground floors had been mostly residential for more than 4 years. There was also discussion about the aspiration for a second pedestrian bridge over the canal to improve connectivity between Queen's Park and North Kensington. However, it was felt that this was probably too expensive.

In response to the consultation with Statutory Consultees, replies were received from Historic England, Natural England and Transport for London. Historic England welcomed Policy 6 and suggested that QPCC should follow their guidance on energy efficiency for historic buildings. Natural England did not consider that the draft Neighbourhood Plan posed any likely risk or opportunity in relation to their statutory purpose.

Transport for London asked QPCC to:

- Refer to the Mayor's Transport Strategy and Health Streets for London Toolkit.
- Include the London Cycling Design Standards in the Plan and to support children cycling and walking safely to school.
- Follow TfL's streetscape guidance to ensure that there is sufficient space for pedestrians, push chairs and those with mobility restrictions.

WCC gave detailed feedback which is set out in Appendix 4 to this document. In summary, WCC made some general comments as well as suggestions about how to improve the wording of some policies and the justification for others. To avoid repetition, a summary of the concerns raised by WCC and action taken by QPCC is set out in the next section to this Statement.

d) How these issues and concerns have been considered or addressed

Residents' comments about Canal Terrace were taken on board and are reflected in work that QPCC is doing on developing a Canal Terrace Planning Information Guide.

QPCC support the following initiatives from the Mayor of London in 2018:

- The Mayor's Transport Strategy and Health Streets for London Toolkit
- Cycling design Standards
- STARS
- TfL's streetscape guidance
- Support for the use of buses rather than cars as much as possible.

The issues and concerns raised by WCC are set out in details in Appendix 4 to this document. In addition to suggestions about presentation and improving justification, WCC raised the following issues:

Policy 4 Residential Gardens (now Policy 3)

WCC asked for greater clarity on this draft policy, which now reads

Development which results in the loss of private residential gardens will not be permitted. Development should preserve significant green space, ensure sustainable drainage, and maintain or enhance the biodiversity of the space.

Policy 8 Improved Pedestrian Access

WCC suggested that the wording needed to be more precise. As a result, the policy now reads,

Development proposals, where appropriate, will be required to be supported by measures that provide for improved pedestrian access. The measures will need to demonstrate that:

- a) Sufficient pavement space is maintained for pedestrians; and
- b) Accessibility for disabled people and those with pushchairs is safeguarded.

Proposals that permit the use of the pavement in front of the shops up to a depth of 1m will be permitted provided that the remainder of the pavement will be accessible to all users.

Policy 9 Residential Development now (Policy 10)

Since WCC officers commented on the draft Policy, a proposal for a mainly affordable housing development has been approved by WCC in Queen's Park Court. The residential housing policy now includes residential moorings and reads

Proposals for narrowboats to be permanently moored for residential use on the Grand Union Canal will be supported, subject to meeting the following criteria:

- Demonstrate that there will not be an adverse impact on the amenity of neighbouring uses/buildings; and
- Ensure that any necessary infrastructure required to service the boats will be provided.

Proposals for infill development that include provision for affordable residential dwellings will be supported, subject to the schemes:

Being of high-quality design; and

Providing sufficient amenity space for inhabitants, including the provision of open space and play space.
Ensuring they are sympathetic to the character of the area where they are located.

Finalising the Neighbourhood Plan:

QPCC has mapped its Policies against both the:

- Westminster City Council's draft City Plan 2019 - 2040, which is currently (14th July 2020) at the 'Examination in Public' stage, and the
- London Plan - intend to publish version December 2019 which is currently at the stage of "informally agree text of new London Plan with MHCLG and Secretary of State".

The detailed mapping exercise can be found in the Basic Conditions Statement. As can be seen, the policies of the Queen's Park Neighbourhood Plan are consistent with both draft Plans.