



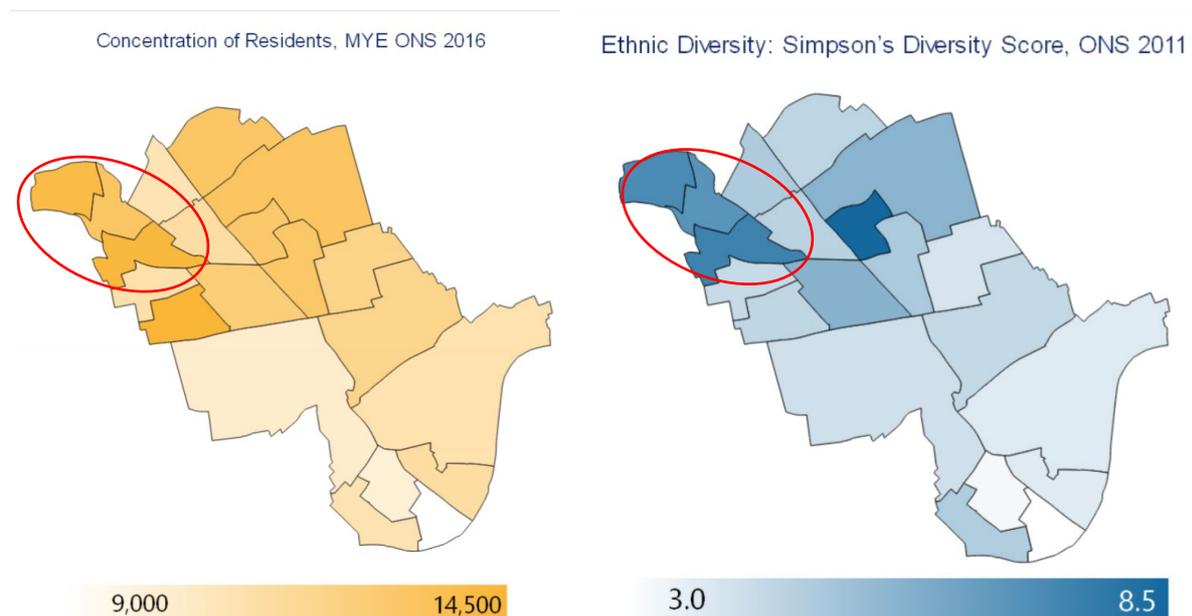
**Maida Hill Neighbourhood Forum (MHNH) Written Evidence to Westminster City Council
Examination in Public
June 2020**

Matter 1 - Procedural / legal requirements

Inspector's Questions and Maida Hill Forum ('The Forum') Responses

1. Why is this issue important to Maida Hill Forum?¹

Together with the neighbouring Queens Park and Westbourne Wards, the Maida Hill Forum area (ie the Harrow Road Ward) is the area of Westminster with the densest residential population, and at the same time with the most complex socio-economic issues, including high deprivation level and number of vulnerable families.



Our Forum's view is that a greater emphasis should be placed by the Council on areas such as ours, where socio-economic issues are more pronounced and where investment in environmental improvements has historically been disproportionately lower than in the rest of the borough. Likewise our view is that the Council should be making extra efforts to

¹ Data sources: City of Westminster Profile 2018, Harrow Road Ward Profile 2018

engage communities in the development of its policies in areas with the greatest needs, with the most diverse and deprived communities, such as ours.

There is a long history of conflict between the Council and the local community over the Council's decisions related to housing and planning from the 1970s onwards (including for example the Shirley Porter scandal). The community is deeply scarred by these conflicts, and many local people are still distrustful of the Council's motivations and actions.

Building a better relationship and collaboratively working with the Council on planning and regeneration policies and projects has been one of the key aspirations of our Neighbourhood Forum ever since its formation in 2015. In the period 2017-18 we initiated work with the Council's Place Shaping and Planning Teams to develop a Place Plan for the area and a Planning Brief for the Woodfield Road area with the greatest development potential. The Council subsequently abandoned plans for the Woodfield Road Planning Brief and delayed work on the Place Plan. The Council justified these changes in their approach by having to divert their resources to the City Plan refresh. Over the last two years we have seen a steady decline in the level of engagement by the Council in the local matters. Our experience with engagement (or the lack of) over the City Plan refresh (as set out below), further eroded our trust in the Council's willingness to engage meaningfully.

However our Forum believes that meaningful community engagement in policy shaping and planning decision is crucial for the wellbeing of our area. Our Draft Neighbourhood Plan policies that resulted from extensive local consultations highlight the need for a greater engagement of community in planning matters and propose strengthening of the Forum's and citizens' role in forward planning and in planning decisions.

Question

Plan Preparation

3. Has the preparation of the City Plan complied with the Statement of Community Involvement?

Our response

We do not believe that the NPPF policies related to consultations on local plans have been adhered to by Westminster City Council. Our key reasons include:

- Inadequate community engagement
- Inadequate responsiveness to community consultation

Our analysis suggests that community consultation responses were three times less likely to be result in modifications to the Plan than average. We lay out our argument below.

Relevant NPPF policy

Westminster's Statement of Community Engagement makes the following reference to the NPPF provisions: "...a **wide section of the community** should be **proactively** engaged to ensure local plans reflect, as far as possible, a **collective vision** and a set of priorities for the sustainable development of the area."

Inadequate community engagement

We do not believe that Westminster City Council made reasonable efforts to proactively engage with our Neighbourhood Forum in preparing the City Plan over the period 2018-19. This had the effect that only about half of the borough's neighbourhood planning groups were able to respond to the Regulation 19 consultation.

- The informal City Plan refresh consultation was carried out in the six weeks immediately before Christmas 2018 (closing date 21 December 2018), while people were busy or away from London.
- A single meeting related to the City Plan refresh was organised by the Council for neighbourhood forums at this stage. This took place on 6 Dec 2018. The invitation came from the Portfolio Holder for Planning, and we were encouraged by the opportunity to hold this important discussion with him. Our Committee members attended the meeting. The Portfolio Holder did not turn up.
- At the meeting Council officers gave a very brief overview of proposed changes and stated that neighbourhood forums would have a chance to comment more fully at the next (Regulation 19) stage of the plan. A contemporaneous email from our officer stated:
"There will be further consultation on the City Plan - this document [The Forum's consultation response] is so that we can try and influence the City Plan ... before the bigger consultation happens."
Attending forums expressed concerns over a number of proposed policy changes. Yet no notes of the meeting were taken or issued by the officers.
- The Regulation 19 stage took place for the statutory minimum six weeks, ending on 31st July during the school summer holidays.
- Our Forum received an invitation to the only consultation meeting for neighbourhood forums, scheduled on 17 July, at the beginning of holiday season, with eight days' notice. This was inadequate: most neighbourhood forums are staffed by volunteer residents. Many work full time and require a longer notice of meetings, especially during holiday periods. This made it impossible for our Forum to attend this meeting.
- The level of information regarding the type of comments sought at Regulation 19 stage was inadequate and clashed with the verbal advice provided by Council officers in December 2018. This left our Forum Committee wondering whether we should simply resubmit the comments made in December 2018.

From our Forum's perspective, the Council's efforts do not amount to proactive engagement with our community. The number, timing and the nature of the events organised for neighbourhood forums, mentioned above, testify to that. In our view this level of consultation cannot be seen as meaningful given the population size of Westminster.

This had a wider effect on community engagement with the City Plan than just Maida Hill Forum. There are around 22 neighbourhood forums either designated, or applying to be designated, in Westminster. These are groups with a specific interest in planning policy. Yet, of these, only approximately half (11) were able to submit a response to the Regulation 19 consultation.

Inadequate responsiveness to community consultation

Overall we see little evidence that the comprehensive comments that we provided both during informal consultation in December 2018 and Regulation 19 consultation in July 2019 were addressed sufficiently in the revised Plan, or covered and responded to in the final **Consultation Statement issued in November 2019**. These are related to the matters we raised with the Inspector in the run up to the EiP. In the table of comments included in the Consultation Statement, we found errors related to references made to our Forum (pp19-20).

In the 'schedule of minor modifications,' following 21 comments referenced in the consultation statement, we can identify precisely one change.

We note this dismissive approach to community comments more widely. There are 27 submissions from neighbourhood forums, amenity societies and residents groups (including from individuals who chair a residents' association) in the Regulation 19 evidence base, representing, collectively, a heroic contribution of hundreds of hours of volunteer time. This is about one in six submissions.

There are, attributed to all of this effort, nine minor modifications, out of 160 made (ie. about one in 18 modifications). Community comments appear to be three times less likely to be taken on board than the average.

Background

Maida Hill Forum is the designated Neighbourhood Forum for Harrow Road Ward in the north of the City of Westminster. The Forum brings together residents, workers and businesses to tackle current issues and influence future development.

We aim to:

- a) **prepare a neighbourhood plan for our area**
- b) encourage community support and involvement in the neighbourhood plan

c) promote or improve social, economic and environmental wellbeing of the area.

The Forum has a membership of over 400 local people and an active volunteer committee of 15 people.

Response prepared by:

Biljana Savic, Maida Hill Neighbourhood Forum Committee member, 24 June 2020