

**In the Matter of a Parliamentary Boundary Commission Public Inquiry**

**Proof of Evidence of Graham King on behalf of the City of Westminster**

**1.0 INTRODUCTION**

1.1 My name is Graham King. I have been employed by the City of Westminster Council ("Westminster") since 1984. I currently hold the position of Head of City Planning Group and have done so since earlier this year. My principal responsibilities include the development and implementation of policies for major redevelopment and strategic co-ordination of projects across Westminster.

1.2 I have previously held the following posts with Westminster:

1984 Conservation Officer

1985 Principal Conservation & Urban Design Officer for the north area of the City

1986 Deputy Group Manager North Area Planning Team

1989 Whilst retaining the above post, in 1989 I was also appointed Project Director for the Paddington Special Policy Area (PSPA)

1993 Corporate Manager City Schemes, including the PSPA

1998 Head of Paddington Group, including PSPA and responsibility for Single Regeneration Budget (SRB) and other regeneration projects throughout the City

1.3 I have been dealing with issues associated with the northern area of Westminster, bounded by Bayswater Road, Edgware Road and Marylebone Road in particular, since 1985.

1.4 As Project Director for the Paddington Special Policy Area since its inception in 1987 I have been personally responsible for co-ordinating the following issues :-

- Negotiating the development of 5 million sq. ft of commercial and residential development in the vicinity of Paddington Station – the largest development site in London.

- Securing over 1,000 housing units within the development of which 600 are under construction now and due for occupation by 2002/3 with the remainder to follow in 2003/4
- Major railway and infrastructure proposals
- Regeneration activities including 3 SRB programmes
- Environmental impact and improvement projects
- Review of the Unitary Development Plan (UDP) including the NW Westminster Study 2000/1.

1.5 This range of local and strategic planning responsibilities has given me a first hand experience of the northern area of Westminster. That is the area that is directly affected by the provisional proposals of the Boundary Commission. Consequently I am familiar the characteristics of the northern area of Westminster and with the issues affecting that area which are of considerable public interest. I also know how that area relates to Westminster as a whole.

1.6 I have in total over 26 years experience in local government, all in London. I have a BA degree and a postgraduate diploma in Town Planning. I am a Chartered Town Planner being a member of the Royal Town Planning Institute. I am also a member of the Institute of Historic Buildings Conservation.

1.7 I gave evidence, on 31 January 1994, to the Public Inquiry at Chelsea Town Hall on the last Boundary Commission proposals for changing the boundary constituencies for Westminster.

1.8 In preparing this proof I have been assisted in the provision of electoral data by Nigel Tonkin, Head of Administrative Services in the Legal and Administrative Services Department. He has been employed by Westminster City Council since December 1994. He is responsible to the Chief Executive as Electoral Registration Officer for Electoral Services, including both the compilation of the electoral register and the administration of elections. He is a Deputy Returning Officer at City of Westminster elections. He holds a BSc (Economics) degree and is a member of the Association of Electoral Administrators. He has over 26 years experience in local government, including over 11 years responsibility for managing electoral services.

1.9 Mr Tonkin is in attendance at the Inquiry and available to answer questions that may arise in relation to electoral issues.

1.10 This proof is ordered as follows:-

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2. Westminster's proposals	page 4	
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1.11 In support of my evidence there are a number of Annexes showing:-

Annex 1	The area of Westminster and Brent South
Annex 2	Westminster City Council's Proposed Parliamentary Constituencies of the "Cities of London & Westminster" and "Westminster North"
Annex 3	Major Sites in the City of Westminster
Annex 4	Parliamentary Electorates in North London Boroughs 1991-2000
Annex 5	Parliamentary Electorates in selected North London Boroughs 2000 and at the General Election in June 2001
Annex 6	Housing Developments yet to be completed in Westminster

- Annex 7 Comparison of the Boundary Commission's and City of Westminster's Proposals based on the June 2001 General Election Electorate
- Annex 8 Population Trends in North London Boroughs 1991-2000
- Annex 9 Household Trends in North London Boroughs 1991-2001-2006
- Annex 10 Westminster's Electorates at Publication by Year 1981-2001
- Annex 11 Local Government Electorates in North London Boroughs 1991-2001

## **2.0 WESTMINSTER'S PROPOSALS**

2.1 Westminster's proposals were set out in the letter to the Boundary Commission dated 1<sup>st</sup> May 2001 (Representation Number 56). In summary they are:

- (1) The Cities of London and Westminster retain two constituencies between them, but without being paired with another Borough.
- (2) One of those two constituencies named "Cities of London and Westminster" and comprising 10 Westminster wards and the whole of the City of London.
- (3) The second constituency named "Westminster North" constituency and comprising the other 10 Westminster wards (including the wards of Lancaster Gate and Bayswater that would transfer from the existing Cities of London and Westminster constituency).
- (4) The London Borough of Brent retains its three constituencies or, alternatively, is paired with another Borough.

2.2 Westminster's proposals support the Boundary Commission's proposals to:

- (i) retain the historic link of the City of London with Westminster;
- (ii) pair Kensington & Chelsea with Hammersmith & Fulham.

2.3 For the reasons set out in the following sections of this statement, Westminster opposes the Commission's proposal to group Westminster with Brent.

- 2.4 Westminster's counter proposals comply with the requirements of the statutory rules governing Parliamentary Constituency Boundaries as contained in Schedule 2 of the Parliamentary Constituencies Act 1986 in the following respects:
- 2.5 Rule 1 "The number of constituencies in Great Britain shall not be substantially greater or less than 613."**
- 2.6 As explained in paragraph 2.7 and 2.8 below Westminster's preferred alternative counter-proposal results in the same number of constituencies in the North London grouping of Boroughs as the Commission's provisional recommendations. It therefore adheres to rule 1 to the same extent as the Commission's provisional recommendations.
- 2.7 The Commission's provisional recommendations for this group of North London Boroughs results in a total allocation of 16 constituencies.
- 2.8 Westminster's proposal to substitute the Commission's three-way group of the City of London/City of Westminster/Brent with a three way group of Brent/Harrow/Hillingdon results in the same number of 16 constituencies:

Commission Proposals:

<b>Boroughs</b>	<b>No of Constituencies</b>
City of London/City of Westminster/Brent	4
Harrow/Hillingdon	5
Kensington & Chelsea/Hammersmith & Fulham	3
Camden	2
Hounslow	2
Total	16

City of Westminster Proposals:

<b>Boroughs</b>	<b>No of Constituencies</b>
Cities of London and Westminster	2
Brent/Harrow/Hillingdon	7

Kensington & Chelsea/Hammersmith & Fulham	3
Camden	2
Hounslow	2
Total	16

**2.9 Rule 2 is not relevant to the Inquiry (in so far as it relates to North London constituencies).**

**2.10 Rule 3 "There shall continue to be a constituency which shall include the whole of the City of London and the name of which shall refer to the City of London."**

2.11 Westminster's counter-proposal complies with rule 3 in supporting the Commission's provisional recommendation to retain a constituency that includes the whole of the City of London and is named "Cities of London and Westminster".

**2.12 Rule 4 (1) "So far as is practicable having regard to rules 1 to 3 ...**

**(ii) no London borough or any part of a London borough shall be included in a constituency which includes the whole or part of any other London borough. ..."**

**2.13** Westminster's counter-proposal achieves this aim by pairing the whole of the City of Westminster, with the whole of the City of London. It does not entail including any part of any other London Borough. In contrast, the Commission's provisional recommendation proposes including part of the London borough of Brent in a constituency with part of the City of Westminster.

**2.14 Rule 5 "The electorate of any constituency shall be as near the electoral quota as practicable having regard to rules 1 to 4; and a Boundary Commission may depart from the strict application of rule 4 if it appears to them that a departure is desirable to avoid an excessive disparity between the electorate of any constituency and the electoral quota, or between the electorate of any constituency and that of**

**neighbouring constituencies in the part of the United Kingdom with which they are concerned.**

- 2.15 Together the electorates of the two Cities of London and Westminster are well within the accepted deviation from the electoral quota. As detailed below, there is not an excessive disparity between the electorate in Westminster's proposed two constituencies and the electoral quota. A departure from rule 4 cannot therefore be justified on this basis.

The electorates for the Cities of London and Westminster at February 2000 were:

City of Westminster	115,117
City of London	5,520
Total	120,637

- 2.16 The total number of electors equates to 1.72 seats using the BCE's electoral quota of 69,934 electors and represents an average constituency electorate of 60,318, which is within the +/- 10,000 deviation from quota (59,934 to 79,934).
- 2.17 In addition Westminster's counter - proposal does not justify a departure from Rule 4 on the basis that there would be an excessive disparity between the electorate of the two proposed constituencies and that of neighbouring constituencies in the part of the United Kingdom with which the Commission is concerned.
- 2.18 This is within the tolerance levels set out by the Commission. It would also result in a lower deviation than either Hackney (120,389 electors) or Islington (119,893 electors). In its provisional recommendations the Commission was recommending that neither of these other two Boroughs be paired although they both had lower electorates than the two Cities combined.
- 2.19 No further grouping of the Cities of London and Westminster with another Borough is necessary. There is no excessive disparity from the electoral quota for the combined electorates of the two Cities, nor an excessive disparity between the proposed two

constituencies and that of neighbouring constituencies. A departure from Rules 1 to 4 cannot therefore be justified.

**2.20 Rule 6 "A Boundary Commission may depart from the strict application of rules 4 and 5 if special geographical considerations, including in particular the size, shape, and accessibility of a constituency, appear to them to render a departure desirable."**

2.21 The City Council's case is that geographic considerations do not justify any grouping of Westminster with Brent. To the contrary, there are significant geographic barriers along the east-west railway lines and in the east-west road network which separate North Westminster from South Brent. The map attached to this submission (**Annex 1**) clearly shows these barriers. The geographical barriers make it undesirable to depart from the strict application of rules 4 and 5.

2.22 Historically there is therefore much less of a "continual residential area or community of interest" along the Westminster/Brent boundary than along Westminster's boundaries with its other neighbouring Boroughs.

2.23 Westminster's boundary with Brent is considerably shorter than its boundaries with its two other neighbouring north London boroughs, Kensington & Chelsea and Camden. Similarly Brent has longer boundaries with both Harrow and Camden than it does with Westminster. Both Westminster and Brent have stronger community ties with their other neighbouring Boroughs than with each other.

**2.24 Rule 7 "It shall not be the duty of a Boundary Commission to aim at giving full effect in all circumstances to the above rules, but they shall take account so far as they reasonably can-**



- (a) of the inconveniences attendant on alterations of constituencies other than alterations made for the purposes of rule 4, and**
- (b) of any local ties which would be broken by such alterations.**

- 2.25 The City Council's case is that there are no local ties between Westminster and the majority of the proposed area of Brent to be included in the proposed constituency. The relevant area of Brent South has ties with the rest of Brent and with Camden, but not with Westminster.
- 2.26 The remaining Rules in Schedule 2 of the Parliamentary Constituencies Act 1986 are irrelevant to the Inquiry for North London Constituency Boundaries. However the following sections from the BCE 'Review of Parliamentary Constituencies 2000' are relevant.
- 2.27 Chapter 4 of that booklet details the criteria for reviewing parliamentary constituencies. Paragraph 15 describes factors which may be taken into account in justifying a particular scheme. Paragraph 16 then states:
- 2.28 **"16. It is in this context that the question of growth (or decline) in the electorate becomes relevant. In considering the position regarding growth after the enumeration date, the Commission distinguish between different types of such growth. First, there is growth which can be shown to have occurred, typically by reference to electoral registers published since the enumeration date, by the time the Commission come to make a recommendation. To ignore totally a substantial existing increase in electorate in selecting between possible schemes would appear to the Commission to be unrealistic."**
- 2.29 **"17. Secondly, there is growth that may occur in the future after the time when the Commission is making their recommendations. This may vary from the highly speculative, based on actual or anticipated plans of builders and planning**

**authorities, to the very probable where sites are in the process of development. The Commission takes no account of projects which can be described as highly speculative. However, if they are satisfied that growth will occur in the very near future they regard themselves as being entitled to take account of this in choosing between permissible options.”**

- 2.30 Westminster’s counter-proposal is based on the February 2000 parliamentary electoral register, which is the common statistical reference point for all electoral areas in the current review.
- 2.31 The combined electorates of the two Cities (Westminster and London), as at February 2000, were equivalent to 1.72 seats under the Commission’s electoral quota.
- 2.32** The number of parliamentary electors in Westminster rose by 6% between 1991 and 2000 compared to an average rise in the North London Boroughs of less than 2%. See **Annex 4**.
- 2.33 At the General Election in June this year there was an increase of 4% in Westminster’s parliamentary electorate over the February 2000 electorate figure.
- 2.34 The electorates at the June General Election for those Boroughs being considered at this Inquiry are set out in the attached table **Annex 5**.
- 2.35 The table at **Annex 5** shows that the parliamentary electorates in Westminster, the City of London and Brent were the only ones that had increased significantly since February 2000 within the North London Borough grouping.
- 2.36 At the June General Election this year the combined electorate for the two Cities (London and Westminster) was 124,907.
- 2.37 Consequently, assuming the General Election in June had been conducted on Westminster’s proposed constituencies, the electorates would have been:

Cities of London & Westminster	63,228
Westminster North	61,679
Total	124,907

- 2.38 This would have given a combined constituency average of 62,453 electors and an average deviation from quota of –7,481. This equates to 1.78 seats.
- 2.39 Although the two constituencies together still fall short of the electoral quota, the gap has already narrowed significantly (by 4,270 electors) since 2000.
- 2.40 The trend is for the electorates to continue to rise before any new parliamentary constituencies come into effect after 2006.
- 2.41 On the basis of current population and electorate trends and an increase in households the gap will continue to narrow further in future. There are over 5,000 new housing units with planning permission yet to be completed (including 1,000 new units of housing on the Paddington development site alone). Over 2,200 of these are new units are currently under construction. See **Annex 6**.
- 2.42 Westminster's submission will therefore result in a scheme where the deviation from quota will diminish in future years.
- 2.43 The Commission's proposed grouping of the two Cities with Brent is already over electoral quota. Consequently with rising populations and electorates the Commission's provisional recommendations will result in an ever-increasing deviation in electorates in excess of the electoral quota. It will be considerably in excess of quota by 2006 as electorates in these three Boroughs continue to rise.
- 2.44 A comparison showing the effects of the City of Westminster's preferred alternative and that of the Commission, based on the General Election electorates is attached as **Annex 7**.

### **3.0 HISTORICAL DEVELOPMENT AND CHARACTER OF THE CITY OF WESTMINSTER**

#### **Historical development**

- 3.1 The development of central London is characterised by the establishment of major roads, and more recently other forms of communication with accompanying residential development. This activity was focused on the original twin centres of London (the Roman City by St Paul's and the Saxon City near the Strand). Later development also focused on the Saxon-Norman establishment of Westminster.
- 3.2 Effectively in the last 1,000 years, the small villages and farms surrounding the twin centres have been overwhelmed by speculative housing developments with a wide and diverse range of suburbs. Within the area of Westminster several specific types of housing developments still exist or at least can still be traced. These range from major planned estates (Regent's Park, Bayswater, Queen's Park, Maida Vale), to speculative development, piecemeal infill (Lisson Grove or parts of Bayswater), and remains of former village centres (Paddington Green).
- 3.3 The historical development, and the continuing life, of these areas reflect the pressures emanating from the centre of activity in the Cities of London and Westminster. With the notable exceptions of the Brunel and Lisson Grove Estates, (which are sited on former railway yards) twentieth century redevelopment has tended only to replace original housing developments (e.g. the Warwick and Mozart Estates), rather than create new residential areas. Throughout the twentieth century, industry, only ever small scale in Westminster, has been increasingly removed from within the Cities by its emigration through pressure from housing/environmental conditions.
- 3.4 In considering the history of the Cities, the development of transportation, which has created the major framework for all subsequent residential and commercial activity cannot be underestimated. Transportation forms the single most significant

element of the area's character and history, that is, its relationship to 'central' London.

- 3.5 As far as the north part of the City of Westminster is concerned the development process started with Edgware Road (Watling St) of the 1<sup>st</sup> Century AD, and the Saxon establishment of Harrow Road. However, the principal basis of the current geography is development that took place during the eighteenth century.
- 3.6 The establishment of the New Road (Marylebone) in 1756, as a very early form of metropolitan by-pass, set the grid from which the speculative developments of Portman, Howard de Walden and Crown estates took their northern bearing in the late eighteenth/early nineteenth century.
- 3.7 The layout of Regent's Park and its associated villas and terraces by John Nash for the Office of Works (Crown Estates) in 1811 broke through part of the congested core of the West End. Its development established the eastern spine of the City of Westminster and linked Primrose Hill to Trafalgar Square.
- 3.8 In the early nineteenth century the scale and pace of urban and "suburban"-isation of the market gardens was quickened by other forms of new transportation. In particular, the establishment of the canal system linking London to the burgeoning commercial complex network of canals in the midlands.
- 3.9 In 1801 the development of the Paddington branch of the Grand Union Canal through to Paddington Basin created London's first canal depot. In 1820, the canal was extended from Little Venice (via Regent's Park) to Limehouse, linking central London with the Midlands and the new London docks.
- 3.10 Shortly afterwards, in 1829 the New Road (Marylebone Road) was utilised to convey the world's first bus service. The service ran from Paddington Green to the Bank of England.
- 3.11 The early nineteenth century transport activities clearly identified the development of the Paddington, St John's Wood and northern areas

of St Marylebone and set the character for their development as residential suburbs. Those suburbs served the commercial cores of the City of Westminster.

- 3.12 Therefore at a very early stage in development trends of the Cities of Westminster and London were established by 'metropolitan' scale transport systems and pressures.
- 3.13 The canal and upgrading of the road systems did not physically disrupt or destroy existing built up areas because their development went largely through farmland. However, the next series of railway developments had a significantly more marked physical and environmental impact upon existing, or recently established communities.
- 3.14 The establishment in 1836-9 of the Great Western Railway on an alignment south of Harrow Road and the Grand Union Canal, with its very intensive series of operation (e.g. main line, sidings and major depots and yards) was the most disruptive development. In its creation and operation it irrevocably split areas of open farm land. This led to different types and rates of housing development on the adjoining land either side of the railway. Other than the historic routes of Edgware and Harrow Roads, there were and still are few road links transgressing the divided areas north and south of the Great Western Railway line.
- 3.15 The most noticeable impact is the development around Paddington Station on either side of the railway. In terms of creating new employment and housing pressures the railway is still a predominant influence on the area. The physical division was emphasised in 1864 by the extension of the world's first underground railway from Paddington westwards. This is now an above ground railway to Hammersmith, with intermediate stations at Royal Oak, Westbourne Park and then into North Kensington.
- 3.16 A key feature of the northern area of Westminster is the marked effect of the combined impact of the Grand Union Canal and Great Western Railway. Their close proximity to the Hammersmith and City Railway Line and the elevated Westway has separated the residential

communities of North Westminster and Brent. This physical barrier is not significantly punctured by roads. Only Ladbroke Grove and the Great Western Road join the Harrow Road corridor to the south. There is only one other existing footbridge canal crossing (Wedlake Street).

- 3.17 In the late 1890's the London Extension of the area Manchester, Sheffield and Lincolnshire Railway, latterly the Great Central, into Marylebone had a significant impact on the areas of St. John's Wood and Lisson Grove. The extension was achieved by tunnelling under St. John's Wood and Lord's Cricket Ground. Large areas south of Lodge Road were demolished and there were significant changes in that area. The railway goods yards sites were later used for public housing (Wharnecliffe Estate, Lisson Grove Estate, Blandford Estate).
- 3.18 The various developments associated with these major transportation systems related to the wards of Westminster. It is significant that the development of metropolitan systems with it's consequent pressures not only dictated the original (commercial and residential) development of the northern area of Westminster but still continues to dictate later and current developments. The alignment and phasing of the Bakerloo Line in 1906-15, created the central spine from the residential part of the north of Westminster back into the heart of the City of Westminster. The parallel introduction of trams on the Harrow and Edgware Roads reinforced routes back to the West End and the centre of London from the northern areas of Paddington and St Marylebone.
- 3.19 The development of the Brent area focused on the small village cores, and later the major railway yards with junctions and links to Euston and to the east, west and north of this southern part of Brent to the rest of outer London.
- 3.20 The northern area of Westminster previously comprising the Paddington and St Marylebone administrative boundaries were not extensively linked to the area of Middlesex north of the old (Willesden / Wembley) now within Brent. Throughout the years of redevelopment this lack of links has continued. This has been due to

the planning policy of successive authorities at county and borough level. The establishment of the elevated Westway in 1972, and even more effectively the major demolitions to facilitate its construction in the late 1960's, have had a significant impact in reinforcing physical barriers along the Harrow Road corridor. Since its development the noise and activity associated with the Westway have emphasised the major impact on the development of the area around Paddington and how that area operates today. The physical, demographic and administrative links have tied the Paddington and St Marylebone areas to the historic core of Westminster throughout this time.

3.21 Historically the sequence of estate development can be summarised as follows:-

St John's Wood (Eyre Estate, Harrow School etc.)	
& Westbourne	from 1820
Bishop of London (Maida Vale)	from 1850 and
again	from 1890
Westbourne Park (also Church property)	from 1879
Queen's Park	from 1875

3.22 By 1900 the urbanisation of the entire area now comprising the City of Westminster was complete. Only local authority redevelopment of either houses in poor condition (Warwick Estate, Mozart Estate) or railway land (Brunel Estate/Lisson Grove) and other major continuing conversion, rehabilitation and refurbishment during the last 25 years has changed the area.

3.23 The refurbishment programme of the mid 1960's was a specific response to the poor housing conditions, particularly in the W2, W9 and W10 areas. These areas had become a public scandal in part as a consequence of the activities of the landlord, Peter Rachman in the late 1950's. The 1965 Millner-Holland Report into the condition of London's Housing considered the problems of housing in these areas amongst others. Earlier proposals to redevelop even large areas of housing, then considered sub-standard under the terms of the Public Health Act 1957, were overtaken by the realisation that the housing stock could not be improved and added to by new housing. The introduction of General Improvement Areas through the Housing Act



1969 gave weight to a programme of repair and rehabilitation in some areas (e.g. Queen's Park, Bayswater and Westbourne). This was accompanied by designation of areas as Conservation Areas.

- 3.24 The important historic, social and physical differences between Westminster and the London Borough of Brent continued into the planning policies of the London County Council and Middlesex County Council before 1965. Westminster and the London Borough of Brent have since then continued these policies under the Greater London Development Plan and its successors.
- 3.25 The roads, canal, railway and the accompanying residential development of the remainder of the northern area is wholly related to the development of central and inner Westminster. The northern part of Westminster is consequently indisputably a part of central London. Brent is predominately an outer London area. The respective identities and links still follow the original pattern of development and subsequent control.

### **Character of wards in Westminster area**

- 3.26 By examining the distinctive character of wards in the north of Westminster and the links to Central London (e.g. the remainder of Westminster) the obvious lack of connections between the northern 10 Westminster and 3 Brent wards affected by the Commissions proposal becomes clear.
- 3.26.1 **Abbey Road** - comprising residential districts of St John's Wood and including the Royal Horse Artillery barracks, the American School, and a major secondary school (Quintin Kynaston).
- 3.26.2 **Regent's Park** - comprising most of Regent's Park and including London Zoo, Madame Tussauds, the London Central Mosque, Baker St Tube station and of course Lord's Cricket Ground.
- 3.26.3 **Church Street** - comprising local authority housing estates, Church Street market which is immediately adjacent to Marylebone railway station. This area which is banded on the south

by Marylebone Road with major hotels, important corporate offices and other central London activities.

3.26.3      **Maida Vale** – includes Elgin Avenue tube station (Bakerloo line) and mostly late nineteenth century residential areas with Paddington Recreation Ground. This area was, mostly developed by the Church Commissioners between the 1850's and 1900. The housing reflects those styles and especially the development of flats and apartments in the north. The Kilburn Park Road boundary, partly based on a minor river alignment also houses the church of St Augustine, a major Victorian church.

3.26.4      **Little Venice** – dating from the early nineteenth century includes the Regent's Canal and Grand Union Canal, which join at Little Venice pool. There is a mix of housing types and styles and the remains of the village centre of Paddington.

3.26.5      **Harrow Road** – a residential district of late nineteenth century housing with some twentieth century infill and refurbishment. Harrow Road is the site of the former St Mary's Hospital and part of the local shopping street that acts as a focus for retail and community activity. It is also the main bus route no 18 and part of no 36 that connects the area to central London (Marylebone and Victoria). Harrow Road itself serves to orientate the entire north west part of the City towards Westminster to the south and away from the north (Brent).

3.26.6      **Queen's Park** – created in 1875-1900 this "Artisans Estate" of terraced houses, was effectively self built, on a grid pattern. Until 1900 Queen's Park was a detached part of Chelsea Vestry. The Estate was developed in isolation from both the residential developments to the East (in Westminster) and Kensal Town to the South (in Kensington). The areas to the west and north were not developed until the end of the 19<sup>th</sup> Century. Only a few terraces in the Queen's Park development occur in Brent along the boundary roads (Kilburn Lane, etc.).

3.26.7      **Westbourne** – An area now split by the Westway but originally divided by the canal and railway; mainly housing closely

related in part to the Notting Hill area and also to Bayswater along Westbourne Grove local shopping street. The Notting Hill Carnival passes through part of the area. The ward contains a station on the Hammersmith & City Line (Westbourne Park).

- 3.27 Although possessing distinct characteristics of their own the three most northern Westminster wards (Queen's Park, Harrow Road and Maida Vale) which adjoin Brent have little in common with their adjoining wards in Brent.
- 3.28 Indeed in each of these three wards the predominant and overriding focus is always south. The wards face towards the rest of Westminster, to the Harrow Road bus routes, the Bakerloo line or the Maida Vale/Edgware Road stations.
- 3.29 In each of these wards the provision of schools, hospitals, shops and all forms of community provision are focused away from Brent. The physical development of the Queen's Park area of Brent, the south Kilburn Estate and Kilburn High Road emphasise this.
- 3.30 The character of the two other northern wards, Lancaster Gate and Bayswater, also deserve attention, if only to prove that their links are stronger with the other northern wards of Westminster than with the southern area of Brent.
- 3.30.1 **Lancaster Gate** – originally based on small inns, villas and farms fringing the Bayswater Road. Predominantly characterised by the larger stucco terraces of the 1860's and 1870's, some post war infill and a long established mix of housing and hotels.
- 3.30.2 **Bayswater** – a more varied mix of early to mid nineteenth century housing, fringing the larger adjacent estates to the south. Focused on Westbourne Grove/Queensway as a commercial centre, with Whiteleys.
- 3.31 From the brief description above it can be seen that the individual wards in their mix of uses do not represent a uniform character. Instead with degrees of difference, or origin, they can be said to

share, and still be identified by the very significant and continuing impact of the growth of central London and in particular the transport systems that characterised Central London's growth and development in the nineteenth century.

- 3.32 The most obvious and prevalent example is the underground system, which includes in the north of Westminster the Jubilee, Bakerloo, Circle and District, Hammersmith and City and Central Lines.
- 3.33 All these lines connect back to central London and the important interchanging stations of Baker Street, Marylebone and Paddington. These routes led and fed residential development from 1864. Whereas the development in Brent followed more than 40 years later. By this time Westminster was wholly developed and its areas character and focus set.
- 3.34 As the road system still follows earlier routes, and Westway is not readily accessible for local traffic it is still the case that the Edgware Road, Marylebone Road, Harrow Road, Bayswater Road form critical routes.
- 3.35 Therefore the transportation links through the area as shown on **Annex 1** tend to serve the needs of central London and provide minimal local service.
- 3.36 The minor physical links created by the Bakerloo Line, Chamberlayne Road and Kilburn Park Road do not create any sense of continuity or community with Westminster.

#### **4.0 SPECIAL NATURE OF THE CITY OF WESTMINSTER**

- 4.1 The City of Westminster fulfils a unique wide range of roles for a unique and equally wide range of activities.
- 4.2 It is the seat of government and most government departments and agencies.
- 4.3 It is the home of the major Royal Palaces.
- 4.4 It is the location for most of the country's major religions (Anglican, Catholic, Greek and Russian Orthodox, Islam) both in terms of places and administration.
- 4.3 It is at the hub of Europe's biggest transportation system with main line terminals at Victoria, Charing Cross, Paddington and Marylebone and the core of the underground and bus networks.
- 4.4 It is a "World City" and a metropolitan and regional hub for shopping, entertainment and culture. Despite the proximity and privacy of the City of London as a centre for commercial activity, Westminster still has over 9 million sq. m. of office space and is the location for many prestigious commercial and entertainment activities.
- 4.5 Westminster is the major tourist area in the country for both national and international tourists. The principal attractions are Buckingham Palace, the Houses of Parliament, Westminster Abbey, Westminster Cathedral, the Royal Parks, London Zoo, Madame Tussuads and the Planetarium, the West End theatres, National Gallery and Tate Britain, National Portrait Gallery, Wallace Collection and the London Transport and Theatre Museums.
- 4.6 Recent changes in three significant areas of public administration, the Fire Service, Police and health are all bringing the provision of these services into line with the existing local authority boundaries thereby increasing the importance and relevance of those areas as a focus for the administration and delivery of all public services.
- 4.7 Some basic facts about Westminster:-

- 53 Conservation Areas covering over 70% of the City, including World Heritage site around Westminster Abbey
- 11,000+ Listed Buildings of special architectural or historic interest.
- 10,000 Planning Applications every year, the busiest authority in the country
- 9 million+ square metres of office space (more than 50% of the total for Central London).
- 44 Theatres
- 40 Cinemas
- 17,000 Restaurants/snack bars
- 465 Hotels with 67,725 bedspaces (over 40% of Greater London's total)
- 250 Hectares of Royal Parks
- Over 20 million overseas tourists a year
- Largest shopping centre in the Country (with more than 60% of Central London's shopping pace)
- Oxford Street is Europe's biggest shopping street.

4.8 Westminster is central to the London economy. The Annual Business Enquiry: Employee Analysis (1999) showed that there were 565,300 employees working in Westminster (2.3% of the national total) at 46,900 workplaces (2.2% of the total). In both cases this put Westminster at the top of the national table. In addition the City of London had 320,200 employees (1.3%) and 14,900 workplaces (0.7%).

4.9 The two Cities combined have 22.4% of the total number of employees in London and 17% of the total number of workplaces.

4.10 However, it would be wrong to characterise Westminster as just a venue for state and "big business". It is also now home to over 244,000 residents who live in a complex, varied and highly intensive and pressurised environment.

4.11 It is essential to the continued success of these various areas of activity that the proper level of parliamentary representation reflecting the increasing parliamentary electorate is available.

- 4.12 During the course of this century the number of constituencies covering the two Cities has reduced from 9 up to 1910 to the current 2. Even as recently as 1974 there were 4 constituencies.
- 4.11 The evolution of parliamentary constituencies of the City of Westminster has in part reflected the declining population of the entire central and inner London area over the period 1910-1990. However, this trend has since reversed and the population risen significantly.
- 4.13 Until 1974 the City of Westminster was, in the north, represented by three constituencies, Paddington North, Paddington South, and St Marylebone.

Between 1974 and 1983 there were two north Westminster constituencies, St Marylebone and Paddington. This was further reduced to one constituency in 1983. Between 1983 and 1996, that constituency was named Westminster North. Following the grouping of the two Cities with the Royal Borough of Kensington and Chelsea in 1996 and to date, the north Westminster constituency has been Regent's Park and Kensington North.

- 4.14 Accordingly, the constituencies in north Westminster since 1918 have been:

1918-74

St Marylebone      Paddington North      Paddington South

1974-83

St Marylebone      Paddington

1983-96

Westminster North

1996 to date

Regents Park and Kensington North

#### **4.15 The differing characteristics of Westminster North and Brent South**

- 4.16 The small farms south of the River Brent, mostly on land owned by St Paul's Cathedral were historically always in Middlesex.
- 4.17 Two sets of railway lines: the main line to Euston/Bakerloo Line and the North London Line running East-West, present major physical barriers of most of the area of Brent South with Westminster.
- 4.18 The two railway line corridors, dating from 1837 (expanded c 1906) and 1865 respectively, significantly affected the character and development of the South part of Brent. In effect the development of the farms and church owned lands by several developers active in this area did not create any physical or social connection with the separately developing areas now in Westminster to the south.
- 4.19 In 1855 the new Paddington cemetery at Willesden Lane in Brent was created. It was built in response to the Burial Acts of that decade which required that cemeteries were remote from residential areas. It therefore signifies that Brent was considered remote from the established residential areas in Central London at the time.
- 4.19 The development of the two major estates in the City, Queen's Park Estate and St Peter's, had only marginal overlaps with the areas to the north then outside their parishes.
- 4.20 This separation was, in part due to the fact that the Westminster areas were from 1900 in the Paddington Metropolitan Borough Council in the County of London, established in 1889 and the 'Brent' areas were wholly within the County of Middlesex and eventually formed part of Willesden.

<b>Local Government Organisation</b>	
London County Council (LCC) 1889	Includes Paddington and St Marylebone vestries and the detached parish of Queen's Park part of Chelsea

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1 November 2001



Local Government Act	1898	(Includes Willesden, within Middlesex County Council) Paddington Metropolitan Borough Council and St Marylebone, established with LCC
Herbert Commission/ Greater London Government Act	1958 1963	Creates City of Westminster from (old) City of Westminster, St Marylebone and Paddington. Creates Brent from Wembley and Willesden (GLC created 1965-86. GLA created 2000)

- 4.21 Parts of the Brent area (e.g. South of Kensal Rise LUL Station) date from the inter-war period.
- 4.22 All of the Westminster areas were fully developed before the start of the First World War. Most of Brent, including virtually all of Wembley and significant parts of Willesden date from after 1919 and particularly after the 1924 Empire Exhibition at Wembley.
- 4.23 The subsequent physical and social developments of the two areas, especially after the introduction of formal statutory town planning, reflected the policies and priorities of the LCC and Paddington for the City. Whereas the Middlesex County Council and Willesden governed the Brent areas.
- 4.24 Despite one limited SRB and one sub-regional European programmes for a short term in the mid 1990's the most important and effective regimes for social, economic and physical regeneration have been through separate and specific programmes, related to the overall priorities, resources and operations for the City of Westminster and Brent. The only continuing operation is the London Waterways SRB and that serves all of London north of the Thames, Westminster being within the central sector and Brent in the west.

4.25 It is important that in considering the creation of new constituencies the Commission give significant weight to the current and emerging policies of both central and local government in identifying areas and forms of administration. The clear definition in national and regional guidance by the government and GLA (and its agencies) identify a central area including all of existing Westminster and within the boundaries of the former LCC – a focus for over 100 years. A pairing with Brent would create an area that included Central and Outer London. This would create a statistical and policy anomaly that would put the constituents, the two Councils and the MP's at a disadvantage. There have been many years of lobbying to achieve a clear borough council for the administration of health areas and the Police. The effect of focusing administration, that has to a large degree been achieved, would be disrupted by the Commission's proposal.

## **5.0 POPULATION AND ELECTORATE**

- 5.1 The provisional recommendations made by the Commission have to be seen against an increase in both population and electorate across all the North London Boroughs since the last review in 1991.
- 5.2 The Office for National Statistics has recently published the mid-year population estimates for 2000. This publication estimates the population in the North London Boroughs to have increased by an average of just over 8.5% since 1991. See **Annex 8**.
- 5.3 At the time of the last Boundary Review the annual trend had been for Westminster's population to fall. The trend now is for a significant rise in population each year.
- 5.4 Westminster's population is estimated to have increased by 30% between 1991 and 2000. Similarly the City of London's estimated population (albeit with a much smaller base) increased by 56% over the period from 1991-2000. This makes the two Cities the fastest growing local authority areas in population in the whole of England and Wales. This growth is likely to continue thereby reversing over seventy years of decline.
- 5.5 Westminster's estimated population has grown from 187,700 in 1991 to 244,600 in 2000. In the process it has risen to having the sixth largest population of the 21 north London Boroughs. In 1991 it rated with the fourteenth largest population.

### **Households**

- 5.6 The estimated number of households in Westminster has increased significantly in recent years and this trend is projected to continue in future years. The major redevelopment now in progress around Paddington Basin will alone add over another 1,000 housing units by 2006.
- 5.7 The Greater London Authority produces comparative statistics on the number of households across the North London Boroughs. See **Annex 9**.

- 5.8 This independent statistical base shows the number of households in Westminster is estimated to have increased by 27,800 between 1991 and 2001. This increase is higher than in any other north London borough and is projected to continue up to 2006.
- 5.9 The following annex numbered 7 indicates the permitted housing units in Westminster awaiting completion and further justifies the claim that the growing population of the City requires adequate representation.
- 5.10 The significant recent residential growth across Westminster is strongly reflected in the latest population estimate (244,600). This figure is the product of a long standing policy on planning (to protect and increase residential stock) and in recent years very extensive investment by private and social housing developers in identifying and securing sites for residential development across Westminster.
- 5.11 This trend was not apparent in published statistics in 1994 but the policies were then in place and have delivered the required result in the intervening years.

### **Local Government Electorate**

- 5.12 In the decade up until 1990 Westminster's electorate was falling but the trend has been rising since then. See **Annex 10**.
- 5.13 A table showing the increase in the local government electorates across the North London Boroughs between 1991 and 2001 was also included in the Westminster's original submission. See **Annex 11**.
- 5.14 Westminster's local government electorate has also increased significantly since 1991, although not at the same rate as its population. This is due to the significant number of foreign nationals in Westminster's population who are not eligible to be registered to vote.
- 5.15 Although not eligible to be included on the parliamentary electoral register, those EU citizens and foreign nationals who are Westminster residents still comprise a significant element of Westminster's

population and call on the services of their MP. They are entitled to vote in local government elections.

- 5.16 Westminster's Electoral Register (as at February 2001) had over 12,500 EU citizens registered.
- 5.17 Returns from the last annual household canvass also showed that there were nearly 18,000 households where there were people living but no one was eligible to register to vote. This figure represents over 15% of the total number of households canvassed in Westminster.
- 5.18 Although the National Office for Statistics do not publish any comparative statistics, Westminster is likely to have the highest number of both European Union citizens and resident foreign nationals of any electoral area in England and Wales.

## **6.0 BOUNDARY COMMISSION'S PROVISIONAL RECOMMENDATIONS AND RESPONSES**

- 6.1 The Boundary Commission's provisional recommendations propose a grouping of the City of London and Westminster (as now) but linking the northern part of Westminster with Brent (to replace Westminster's current pairing with Kensington & Chelsea).
- 6.2 The Commission also recommends pairing Kensington & Chelsea with Hammersmith & Fulham (instead of with Westminster as now).
- 6.3 The approach adopted by the Commission is set out in paragraph 23 of the Assistant Commissioner's Statement issued on 12 September 2001:  
"The Commission provisionally decided that the boroughs of Brent, Hammersmith & Fulham, Kensington & Chelsea, Hillingdon and Westminster each needed to be paired."  
This was because each individually had average constituency electorates more than a +/-10,000 deviation from the electoral quota. The City of London was not included in the list.
- 6.4 Consequently to limit the number of Boroughs to be paired, the Commission proposed grouping:  
  
Brent, Westminster and the City of London; and pairing Hammersmith & Fulham and Kensington & Chelsea; and Hillingdon and Harrow
- 6.5 Harrow is the only Borough on the above list with an electorate within the electoral quota, but which had been identified to provide a necessary pair for Hillingdon.
- 6.6 If at the outset the Commission had treated the two Cities of London and Westminster as a joint electoral area, the combined electorates would then be within the 10,000 deviation from the electoral quota. The two Cities would not then have qualified to be paired with another

Borough and the Commission could have omitted them from the list of Boroughs needing to be paired.

- 6.7 If this approach had been adopted this would have left Brent and Hillingdon as the two outer London Boroughs requiring to be paired.
- 6.8 Grouping Harrow with them both would have limited the number of Boroughs needing to be paired to a minimum. Harrow would then be grouped with two other Boroughs (Brent and Hillingdon). That would be no different than the present position in which Westminster is currently grouped with both the City of London and Kensington & Chelsea. Nor is it different from the Commission's proposal that Westminster be grouped with the City of London as well as with Brent.

#### **Westminster's Submission (No.56)**

- 6.9 Westminster's submission is that the Cities of London and Westminster should return to having two constituencies between them – without needing to be paired with another Borough.
- 6.10 This equates to 1.72 seats using the BCE's electoral quota of 69,934 electors.
- 6.11 The proposal is to redraw the boundaries to include the Bayswater and Lancaster Gate wards into the northern constituency. They were previously part of the former Westminster North constituency and this proposal is supported by elected representatives in the two wards and a number of other submissions.
- 6.12 It is also proposed to revert to "Westminster North" as the title of the northern constituency as opposed to retaining "Regent's Park". The Park is at the edge of the constituency and partly in Camden. "Westminster North" is a much better description of the area and more readily understood by local residents.
- 6.13 Redrawing the boundaries this way would have resulted in electorates (using the 2000 base) of:

Cities of London & Westminster	61,621
Westminster North	59,016
Total	120,637

- 6.14 This would have given a combined constituency average of 60,319 electors and an average deviation from quota of –9,615.
- 6.15 The case being argued at this Inquiry is the same as Westminster made at the last Inquiry in 1994. At that Inquiry Westminster argued that the two Cities of London and Westminster should retain two constituencies between them without being paired further. However the combined electorate figures for the two Cities is much higher now than it was in 1994 (120,637 now as compared to 113,725 then).
- 6.16 Westminster then argued (as also did the Royal Borough) that Kensington & Chelsea should be paired with Hammersmith & Fulham. The Commission's proposal now to adopt the latter suggestion and so pair Kensington & Chelsea with Hammersmith & Fulham for the future is supported by Westminster.
- 6.17 New ward boundaries come into effect from the publication of the Register in December this year (2001) in time for next May's City Council elections. The two new constituencies proposed by the City Council would comprise 10 Westminster wards each - with the City of London being linked (as now) to the southern constituency.

### **Proposed Cities of London & Westminster constituency:**

Knightsbridge & Belgravia  
Tachbrook  
Warwick  
Churchill  
Vincent Square  
St James's  
West End  
Marylebone High Street  
Bryanston & Dorset Square  
Hyde Park  
+ City of London



### **Proposed Westminster North constituency:**

Bayswater ) although both currently in the Cities of  
Lancaster Gate ) London & Westminster constituency, they  
 ) were previously in Westminster North until  
 ) the last review

Lancaster Gate  
Westbourne  
Queen's Park  
Harrow Road  
Maida Vale  
Little Venice  
Church Street  
Abbey Road  
Regent's Park

### **Continued Link with the City of London**

- 6.18 All of the responses from within the Cities of London and Westminster support retaining the current constituency link. Both Councils (City of Westminster and Corporation of London) make submissions in favour of retaining the link as do the political parties, the former MP (Lord Brooke), the newly elected MP (Mr Mark Field) and many others. Many submissions received on this aspect show the strength of feeling, supported by cogent arguments on the shared history and identity and the close ties that have been developed between the two Cities over many years. The responses include a number expressing unhappiness with the pairing that was created in linking the City of London with east London Boroughs in the current GLA Constituency, instead of linking the City of London with Westminster as Westminster had argued.
- 6.19 Cllr Ian Bond of Redbridge (No 91) supports linking Brent with Westminster and the City of London with Tower Hamlets. However this is the only submission suggesting linking the City of London with Tower Hamlets.

- 6.20 Otherwise there is overwhelming support for the Commission's provisional recommendation to retain the current constituency link between the two Cities.

### **Proposed link with Brent**

- 6.21 Other than two submissions, there is overwhelming opposition from all quarters to the proposal to link Westminster and Brent. There is opposition to the idea from both Councils (Westminster and Brent), the political parties and from many other respondents.
- 6.22 John Grady (No 46), a resident of Kensington & Chelsea, has put in an alternative proposal. He accepts the idea of Westminster being paired with Brent but suggests Hyde Park, Lancaster Gate and Bayswater wards transfer into the northern constituency and Church Street, Abbey Road and Regent's Park transfer into the south. His is the only submission putting this forward. His proposal would result in reinstating the former Borough boundaries that now make up Westminster. The former Paddington Borough would be linked with Brent South and the former St Marylebone and the Old City of Westminster with the City of London. However the overwhelming responses to the Commission's provisional recommendation is that a pairing of Brent and Westminster is neither warranted nor justified and should not proceed.
- 6.23 One other submission from David Walton (on behalf of a Carlton ward group that is within the area of Brent that it is suggested be linked with Westminster), supports pairing Brent and Westminster.
- 6.24 This respondent mentions the SRB programme that was a joint operation between Westminster and London Borough of Brent. This project has now ceased and been overtaken by two separate programmes one based in each local government area. Furthermore the majority of projects within the SRB programme, with the exception of policing initiatives, did not cross the boundary.
- 6.25 In December this year the European URBAN funded projects, end. Under 'Objective 2 status' this EU sub-regional programme covers a large area of West London including Park Royal, and North

Kensington and represents the only other formal link between Inner London (Westminster) and Outer London (Brent).

- 6.26 The more recent borough-centred SRB's and regeneration initiatives are more indicative of the long term links and needs of the areas.
- 6.27 The joint Brent/Camden SRB on Kilburn High Road is however a joint operation for an area of joint interest between those authorities and concern that is not replicated between Westminster and Brent.
- 6.28 A wide range of the submissions opposes the pairing on the grounds of a lack of common identity between the south part of Brent and North Westminster. There is no shared affinity and the views submitted from within both Brent and Westminster make that plain.
- 6.29 There is also the strong view that residents in that part of Brent do not identify with Westminster residents to the south but are more tied in as part of Brent. There are also other submissions that refer to the closer connections that exist between communities in Brent and Harrow or Brent and Camden.
- 6.30 Indeed this is clearly set out in the recent (2002) LB Brent Unitary Development Plan which includes the fact that, according to a well used travel study (LATS 1991) only 16% of Brent residents travel includes trips to Westminster.
- 6.31 Brent is clearly an Outer London borough and its significant links are with other outer London areas.
- 6.32 Brent's case (No 57) is to stand alone without being paired with another Borough. If the Inquiry were to accept both Westminster's and Brent's arguments that they should both stand alone, there would be no further knock-on effects on the Commission's proposals for other Boroughs.
- 6.33 If Brent's case to stand alone is not accepted, others have put forward cases in favour of either a Brent/Harrow or Brent/Camden link rather than a Brent/Westminster link.

6.34 Westminster's submission proposes that if Brent has to be paired it should be with Harrow and Hillingdon. The BCE were in any case proposing a pairing of Harrow and Hillingdon so adding Brent only helps to reduce the deviation from electoral quota.

6.35 As a further option Westminster's submission also suggests pairing:

Brent & Harrow  
Hillingdon & Hounslow

6.36 This latter proposal does result in the creation of one more seat amongst this grouping of Boroughs.

### **Retaining the current link with Kensington & Chelsea**

6.36 The Labour Party and other representations support retaining the existing pairing with Kensington & Chelsea.

6.37 Westminster's main case against this proposal is that the rise in electorate numbers does not justify Westminster and the City of London being linked with any other Borough. Rising electorates will result in an ever-widening deviation in excess of electoral quota.

6.38 The electorates for the current two parliamentary constituencies at the June General Election (as compared to the General Election in 1997) were:

	2001	(1997)	Increase
Cities of London & Westminster	71,935	69,074	+2,861
Regent's Park & Kensington North	75,886	73,752	+2,134

6.39 The 2001 General Election electorate gives a combined constituency average of 73,910 electors and an average deviation from quota of +3,976.

6.40 As the figures set out above for the General Election show the electorates for both existing constituencies are above the electoral quota and that gap will continue to widen in future years.

- 6.41 The Commission's proposal to link Kensington & Chelsea and Hammersmith & Fulham is considered the best solution for those two Boroughs for which there appears widespread support.
- 6.42 Hammersmith & Fulham (an inner London Borough) is currently paired with Ealing (an outer London Borough). Hammersmith & Fulham and Kensington & Chelsea both form part of the West Central GLA constituency. As inner London Boroughs with a long shared boundary they share far more characteristics with each other than with an outer London Borough.

## **7.0 CONCLUSION**

- 7.1 Westminster's submission is that on the 2000 electorate alone the two Cities are entitled to two constituencies without being paired further.
- 7.2 It has also demonstrated that there has been a significant increase in parliamentary electorate between 2000 and the General Election in June 2001. This increase equates to 0.6 for both seats using the BCE's electoral quota. Population and household data also demonstrate that this trend will continue.
- 7.3 The Inquiry has the benefit of many individual submissions made by Westminster residents, which universally support the existing link with the City of London and oppose the proposed pairing with Brent.
- 7.4 The three volumes of representations received by the Commission show the very strong sense of historical identity and current priorities that entirely justify the case put forward by Westminster.
- 7.5 Any form of administration or representation must strive to be clear, related to public need, and acknowledge public concern. The Commission's proposals are not supported on the basis of representations, nor can they be justified by reference to geography or history.
- 7.6 Westminster is clearly all related to Central London, Brent to Outer London. Since their original development every phase or activity has recognised that clear distinction.
- 7.7 Under the terms of the Local Government Act 2000 and the emerging proposals for the establishment of a Local Strategic Partnership and operation of Neighbourhood Renewal activities (which Westminster qualifies for including the wards affected by the Commission's proposal) will further develop existing links across the whole City.

- 7.8 In the view of Westminster (and many others) the suggested pairing of Westminster and Brent South would be viewed to be most unsatisfactory if it were to be adopted.
- 7.9 The principal (Rule 4) of working within established local government boundaries is one to be adhered to as far as practicable. Now that there has been a significant rise in residential population and other agencies are now operating on the basis of those well established boundaries, themselves subject to recent review and mostly unchanged, the Commission should support the local authority, those who made representations and the interests of the wider community in granting the two Cities the two MPs as proposed in this proof.