

Overview and Scrutiny Challenge Session Report

Empowering Communities - engaging our diverse community at a locality level

26/07/2021



Table of Contents

Chair’s Foreword.....	3
Summary of Recommendations.....	3
Introduction.....	4
Reason for Enquiry.....	5
Methodology.....	6
Key Findings and Recommendations.....	7

Chair's Foreword

I am pleased to present this challenge session report which focused on empowering communities and how the council can improve its engagement with the borough's diverse community at a locality level. This builds on the Overview and Scrutiny Committee's November 2020 spotlight discussion on improving resident engagement.

Over the past 20 years there has been a strong appetite in the UK for devolved powers to local authorities. However, some feel that not enough has been done to support local decision-making.

As Ward Councillors, we often hear from constituents that they would like to get more involved in shaping their local area but feel that there are not enough avenues to put forward their suggestions, or that it's difficult to understand how their feedback led to improvements to their local area. Whilst there is an acknowledgement that Neighbourhood Planning Forums provide residents the chance to feed into place-shaping priorities, there continues to be limitations with this approach, and it is often not representative of the wider community nor those from hard to reach groups.

Community involvement on place-shaping not only empowers them but also strengthens the wider stakeholder relationship, provides better understanding of local priorities, and ultimately delivers the outcomes that the community want. Importantly too, people then become invested in their localities, and attach value and importance to the things that happen in their areas.

The challenge session heard evidence from the Planning and Building Control Team, Parks and Open Spaces as well as Centre for London Think Tank, Tower Hamlets Council for Voluntary Services and London councils including Waltham Forest and Haringey. I'd like to thank those who contributed:

- Claire Harding - Research Director from Centre for London Think tank
- Peter Okali - CEO Tower Hamlets Council for Voluntary Services
- Jessica Cargill – Thompson (Former) Engagement Officer from London Borough of Waltham Forest
- Jean Taylor - Head of Strategy and Policy, London Borough of Haringey
- Cllr Eve McQuillan - Cabinet Lead for Planning and Social Inclusion and council officers for Planning and Building Control/ Parks and Open Spaces

I would also like to thank my scrutiny colleagues who supported the discussion and provided valuable insights and shaped the recommendations of this report. I look forward to the executive's response, and how we all may better serve our communities.

Cllr James King,
Chair, Overview and Scrutiny Committee (2020-21)



Summary of Recommendations

Recommendation 1

The council uses the South Poplar and Isle of Dogs Community Development Panel as a potential model for engagement in other areas of the borough with a focus on facilitating place-based priorities for regeneration and local investment in the local area.

Recommendation 2

The council strengthens the feedback loops (for regular dialogue with residents) into existing programme delivery including the Local Infrastructure Fund, the Capital Programme, regeneration schemes.

Recommendation 3

The council surveys / engages residents to determine local COVID-19 recovery priorities, for example: regenerating local highstreets, active business to the area or advocating the use of parks and open spaces to promote community benefit of public health.

Recommendation 4

The council develops a geography-based partnership approach that brings collaboration from the council, public and private partners, VCS and others to pick up local priorities.

Introduction

- 1.1. Community engagement is considered to be the active participation of local residents and community groups in the decisions that affect their lives. Neighbourhoods can act as the catalyst for developing social connections, satisfying basic needs and place-based policy. Centre for London's recent¹ report recognised that neighbourhoods provide the necessary spatial levels to which many residents are best able to participate in local governance.
- 1.2. In Tower Hamlets, Neighbourhood Planning Forums (NPF) is one of structure that enable residents and communities to feed into their local infrastructure, capital and investment spend programmes via the Neighbourhood Plan. These forums empower residents and communities to play a key role in influencing how development will occur at a neighbourhood level. Neighbourhood plans are both significant and important because they are used by local planning authorities to inform decisions about planning permission and investment in neighbourhood plan areas.
- 1.3. In short, neighbourhood plans have the potential to:
 - Give communities a bigger say over the type, location, size, pace and design of development;
 - address trends and challenges faced by the communities;
 - foster collaborative relationship between communities, developers and the local authority; and
 - enable neighbourhoods with more influence on how its implemented.
- 1.4. Membership for Neighbourhood Planning Forums² is open to people living and working in the area, and elected members for the area, it requires a minimum of 21 members from above groups and membership should be drawn from different places in the area and different sections of the community.
- 1.5. Neighbourhood plans produced in forum settings often requires significant commitment of time and technical or professional skills by unpaid volunteers. This can pose some challenges for engagement with people who may not necessarily have the skills/time to do this.

¹ [Act-Local-Empowering-Londons-Neighbourhoods.pdf \(centreforlondon.org\)](#)

² [How to establish a neighbourhood planning forum - Locality Neighbourhood Planning](#)

- 1.6. Trust for London report³ surmises that high levels of deprivation areas can produce both opportunities and challenges when developing neighbourhood plans including:

Challenges	Opportunities
Lack of funds and high costs	Input into incoming development
Lack of skills	Social benefits and community leadership for the community
Limited engagement and membership	Improved relationship with local authority

- 1.7. Whilst local authorities are required by law to consult on local plans and new developments, residents often complain that these processes lack meaningful involvement for them.

Reason for Enquiry

- 2.1. Resident raised with members about the council’s approach to local engagement and some of the challenges to these and how it sometimes does not engage those seldom heard. They also raised how their views does not lead to changes which has an impact on future engagement with the council. Centre for London report⁴ implies that consultations are seen by many as box-ticking exercises and does not allow residents to influence plans from an earlier stage.
- 2.2. The Covid-19 pandemic restricted the council in undertaking an Annual Resident Survey (ARS) for 2020. However, the council undertook a mid-Pandemic Resident Survey (PRS) in 2021 to capture the residents’ perception of the council.
- 2.3. The PRS is not directly comparable to previous surveys as the methodology applied was different during lockdown. Some of the challenges of using the telephone-based approach are:
- it is harder to get hold of and to engage with participants;
 - it is harder to obtain a good random location sampling; and
 - respondents make less of an effort answering questions when compared to face to face resulting in different response distributions.
- 2.4. While acknowledging the challenges of comparison it is worth noting the downward trend in confidence in the resident’s perceptions on the council’s engagement in the last two years. There could be a number of reasons for these including service delivery and engagement being undertaken so a lack of visible presence by council officers.

Resident Perception	ARS 2018/19 (%)	PRS 2020/21 (%)
Residents’ perception of being involved in council decision-making	57	51
Residents’ perception of council transparency	51	39
Residents’ perception of being kept informed by the council	72	67
Residents’ satisfaction with council and partner response to antisocial behaviour (ASB)	52	42

- 2.5. In November 2020, the OSC reviewed the council’s approach to resident engagement including the consultation hub. The committee recommended that the council needs to listen to the views of residents, businesses and partners to help shape the design of local services, policies whilst keeping a robust focus on community concerns. Whilst this report makes

³ [NPL_investigating_the_potential_on_areas_experiencing_high_levels_of_deprivation.pdf \(digitaloceanspaces.com\)](#)

⁴ [Act-Local-Empowering-Londons-Neighbourhoods.pdf \(centreforlondon.org\)](#)

references to established engagement processes, it does not focus on the duty on statutory consultation.

Methodology

- 3.1. This challenge session was chaired by Cllr James King, Chair of Overview and Scrutiny Committee and took place on Wednesday 21 April 2021 as virtual meeting.
- 3.2. The committee heard from the Cabinet Lead for Planning and Social Inclusion, council officers from Planning and Building Control Service and Parks and Open Spaces projects. In addition, invited Centre for London think-tank, Tower Hamlets Council for Voluntary Services and officers from neighbouring local authorities from Waltham Forest and Haringey.
- 3.3. The scope of this challenge session set out the following key questions:
 - How do current structures enable a diverse range of residents to engage at a locality level?
 - Should LBTH consider establishing local governance structures to enable residents to shape their area?
 - What would the resource implications of this be?
 - What works well in other boroughs?
 - What would the scope of these structures be?

3.4. Members in Attendance

Councillor James King	Chair of Overview and Scrutiny Committee (OSC) / (challenge session chair)
Councillor Eve McQuillan	Cabinet Lead for Planning and Social Inclusion (job share)
Councillor Gabriela Salva-Macallan	Scrutiny Lead / Chair for Health and Adults Scrutiny Sub-Committee
Councillor Leema Qureshi	Scrutiny Lead for Finance and Resources
Councillor Faroque Ahmed	Scrutiny Lead for Community Safety and Environment.
Councillor Ehtasham Haque	Scrutiny Lead / Chair for Housing and Regeneration Scrutiny Sub-Committee
Councillor Marc Francis	OSC Member
Councillor Andrew Wood	OSC Member
Councillor Denise Jones	OSC Member
Halima Islam	Co-opted Member
James Wilson	Co-opted Member

Evidence received from witnesses and guest speakers and council officers

Clare Harding	Research Director, Centre for London (think-tank)
Peter Okali	CEO of Tower Hamlets Council for Voluntary Services
Jessica Cargill - Thompson	Guest speaker (covering London Borough of Waltham Forest approach)
Jean Taylor	Head of Strategy and Policy, London Borough of Haringey
Jennifer Peters	Director Planning and Building Control
Matthew Pullen	Infrastructure Planning Manager
Steven Heywood	Planning officer

Alice Bigelow	Parks Manager Parks and Open Spaces
---------------	-------------------------------------

The challenge session was supported by

Filuck Miah	Strategy and Policy Officer, Corporate
Daniel Kerr	Strategy and Policy Manager, Corporate

Key Findings and Recommendations

Recommendation 1

The council uses the South Poplar and Isle of Dogs Community Development Panel as a potential model for engagement in other areas of the borough with a focus on facilitating place-based priorities for regeneration and local investment in the local area.

- 4.1. The Committee heard that in principle the starting point for any planning decisions rested with the planning system that included local plan, supplementary planning documents (SPDs) and neighbourhood plans and private investment. This helps to deliver local priorities such as the spending of Community Infrastructure Levy (CIL) and Local Infrastructure Funding (LIF) and that all decisions are made by this process.
- 4.2. The Cabinet Member for Planning and Social Inclusion informed the committee that the council recently set up a Community Development Panel for the South Poplar and Isle of Dogs area. The objective of the panel was to:
 - Examine pre-applications and policies in depth (as they are being created) before they get to the application stage
 - Introduce the community voice, knowledge and obtain insights from residents about the physical environment for proposed changes or improvements.
- 4.3. The committee heard that alongside public advertisement and networking through local councillors, the council used FRAME (specialists in running panels) to recruit a diverse group of 12 members from the area for the South Poplar and Isle of Dogs Community Design Panel. The rationale behind this was to ensure that the panel held independent voice that fed into local priorities and decision making.
- 4.4. The rationale for setting up the Community Development Panel in South Poplar and Isle of Dogs location was as a result of:
 - Collaborative work undertaken with Greater London Authority on the Opportunity Area Framework
 - Volume of development in this area and the cumulative impact and benefits it looks to achieve.
 - Statutory planning consultations and applications are usually fully formed by the time they reach the planning committee for either approving, declining or attaching additional conditions before final sign off. This does not leave much scope for shaping priorities.
 - Planning consultations often hear from the same disproportionate voices of people from wealthy economic backgrounds, often owning properties in the area and have more time to feed back their priorities which may not be in sync with other residents of that locality.
 - Need to get the right mix of residents that bring skills to the table and create balance in a team.

- 4.5. Whilst 12 members of Community Development Panel are not wholly representative of South Poplar and Isle of Dogs area, it is a starting point for this new initiative in terms of empowering those community voices who are not normally heard or featured in mainstream structures for planning consultations.
- 4.6. Furthermore, Centre for London⁵ suggests that local authorities and community groups should monitor and evaluate the extent and diversity of participation because it helps to:
- capture a variety of knowledge and expertise in the local area;
 - ensure the benefits of participation are spread equally amongst local residents,
 - ensure that the process of involvement itself is not exclusionary; and
 - ensure neighbourhood governance mechanisms are as representative of their local area as possible.
- 4.7. The Cabinet Member for Planning and Social Inclusion explained that there is a significant challenge for council's formal planning consultations, often capturing only very limited voice or partially focused on what the neighbours in the area think but it needs to shift its approach to people who are going to live in the area and will be better placed to input on local place shaping priorities.
- 4.8. The committee commented that focussing on engaging people in housing need from the council's waiting list should also be involved in the planning process as their views are often absent in shaping local priorities. The committee believes that the council needs to do more to encourage, facilitate and bring together homeless families in temporary accommodation, or consciously engage overcrowded households living in the vicinity of a new development and do this by design.
- 4.9. Whilst this maybe the case elsewhere, Tower Hamlets Council for Voluntary Services commented that there is sometimes a lack of meaningful involvement from the voluntary and community sector in some of the public consultations effecting different services or policies. The voluntary sector can play a crucial role in channelling the views of residents on key issues such as that of infrastructure, investment and capital programme spend.
- 4.10. London Borough of Haringey took a different approach to Tower Hamlets on borough wide community engagement. They presented to the committee their citizens' panel consisting of 1200 (representative of the community) people (target 1900) structure. They informed the committee that this approach helped them to better understand resident perception, confidence and trust in public services. On the development of the CDP, the council should consider some of the benefits of this approach:

Benefits

- Ability to collect data efficiently, on a wide range of topics at relatively lower cost, is increased;
- the panel provides a platform to bring together traditionally under-represented groups; and
- the format helps to ensure residents are informed about what the council is doing in response to their feedback thus increasing transparency.

Outcomes

- Deeper understanding of residents view;
- more robust representative evidence based;
- greater resident engagement and sense of influence; and
- improved council and community relationship.

⁵ [Act-Local-Empowering-Londons-Neighbourhoods.pdf \(centreforlondon.org\)](#)

- 4.11. For improving the rate of participation or recruiting for the CDP, a recent report by New Local⁶ suggests that using more deliberative and participatory instruments could also help the community to have greater influence, meaningful involvement and improve resident engagement at a locality level. Getting residents involved in CDP will involve co-production activities, Newham⁷ suggests that for co-production to be effective it needs to be integrated into the public value process that underpins public services.
- 4.1. London Borough of Waltham Forest informed the committee that their experience of resident engagement on planning issues involved residents engaging with their local plan. Their finding below highlight some key considerations that the CDP will need to factor:
- Market stalls were used to speak to residents (who would not normally attend meetings) and highlighted the continued importance of face-to face dialogue.
 - Using digital platforms should be the ones that residents are most familiar and comfortable with.
 - Cost of engagement was a challenge and required 180 additional office hours on top of normal working hours.

Recommendation 2

The council strengthens the feedback loops (for regular dialogue with residents) into existing programme delivery including the Local Infrastructure Fund, the Capital Programme, regeneration schemes.

- 5.1. The committee commented that their constituents often complain that the pace of response is slow when engaging in dialogue on particular place-shaping issues. This has implications on public confidence, some of which are numerical such as details on what the votes were for a particular development or capital delivery.
- 5.2. In supporting a mechanism for residents' feedback, Council officers attempted to go beyond the standardised approach of engagement by:
- Holding workshops with neighbourhood planning forums;
 - Collaborating with the council's community engagement team to try and access hard to reach groups; and
 - where there is opportunity to join public events like market stalls, high-street drop-ins, officers look to engage people where they are rather than expecting people to come to their location.
- 5.3. The planning and building control service has the aspiration to hold better resident engagement on place-shaping activities, the current planning system continues to be a challenge. It's often viewed as rigid and places limitations on what can be achieved. Council officers also commented that it is important to manage expectations from the outset when undertaking resident engagement or consultation on place-shaping discussions (as the council has to balance its focus in delivering on high housing targets set by the London Plan which is influenced by national policy) given that the feedback loop can sometimes feel like it does not provide the answers or outcomes that people are wanting.
- 5.4. The Cabinet Member for Planning and Social Inclusion acknowledged that the current statutory consultation takes place once planning applications are already fully formed so there is little opportunity for the local community to help shape or influence the planning

⁶ [Shifting-the-Balance.pdf \(newlocal.org.uk\)](#)

⁷ [Democracy-Commission-Report.pdf \(newhamdemocracycommission.org\)](#)

application. The chair also reiterated the above point and commented that it was crucial to obtain the feedback earlier from the community which could reduce some of the later challenges further down the line.

- 5.5. The Community Infrastructure Levy (CIL) is a tax on new development that is paid by developers to the Council when they commence building and used by the Council for the provision of infrastructure (e.g. schools, roads, parks, etc.). In Tower Hamlets, a proportion of this called the Local Infrastructure Fund (LIF) is distributed across the four regions of the borough and helps accommodate place-shaping growth at a locality level. Any spends of this type remains part of the statutory planning process and requires the council to consult local people before spending.
- 5.6. The committee noted that the LIF programme received approximately 2000 project nominations over the last two years. This is where the council asks local people about their local infrastructure priorities which provides an extensive set of feedback and demonstrates that there is a real appetite from residents to be engaged in the process of local growth. Projects are assessed against the following:
 - Deliverability; and
 - Social value (including increasing participations, influence and engagement, positive impact on equalities group and social cohesion)
- 5.7. The committee commented on the how place-shaping could also benefit from linking in with other channels of engagement to increase the number of residents engaged, such as local Safer Neighbourhood Teams ward panels that discuss Anti-Social Behaviour as part of intelligence for 'Liveable Streets Programme'
- 5.8. The committee noted that the challenge for feedback loop can be constrained because both LIF and capital delivery take time to get off the ground as they require extensive design consideration before being implemented. The council accepted that more work is needed for a robust feedback loop (integral to resident engagement) to support the existing annual consultation and annual Infrastructure Funding Statement processes. This could be supported using the council's geographical system (GIS) as a visual mechanism to highlight where projects have been allocated and the delivery status of these.

Recommendation 3

The council surveys / engages residents to determine local COVID-19 recovery priorities, for example: regenerating local highstreets, active business to the area or advocating the use of parks and open spaces to promote community benefit of public health.

- 6.1. Many councils accept that place-shaping will generate both challenges and opportunities for local governance. On place-shaping priorities, developers will need to embed some elements of governance (including capturing the resident's views) on their plans at the design stage. This will improve their understanding of the community needs on infrastructure projects and the broader social aims.
- 6.2. A council officer who is involved with the council's park and capital programme commented that residents are uniquely placed to be actively involved with place-shaping around the public health agenda link to their environment (now more acutely visible due to COVID-19 pandemic). However, the caveat to this is that there are variances on types of engagement and

a ‘one size fits all’ approach does not always work. Newham⁸ suggests that place-shaping needs to harness the tacit knowledge of citizens derived from their roles as ‘experts by experience’.

- 6.3. The issue officers faced on parks capital delivery was that they would only hear from people who have the capacity and time to engage. This often meant that only those voices from affluent background and or those who have the confidence to engage are heard. The council officer reflected and suggested that to reach seldom heard or unserved groups for their capital delivery work stream, face to face engagement remains more effective and cited an example of talking to parents about play equipment as they were collecting the children for the school gates. This approach encouraged direct engagement from parents who would not normally attend meetings or respond to an online consultation. The officer also emphasised the importance of a feedback-loop and that this should not be understated within the engagement process.
- 6.4. It is crucial for any planning authority to understand the benefits and limitations of a digital approach. The officer concluded that any meaningful resident engagement for place-shaping must not underestimate the impact of doing it thoroughly and take into account factors such as timescales and project budgets.
- 6.5. A council officer informed the committee that government’s consultation on this issue suggests that more decision making will be made earlier and at a policy making level to help remove any ambiguities. Therefore, it will be crucial for residents and communities to be involved early on with local recovery place-shaping priorities.
- 6.6. The committee commented that it was important that all voices are heard in terms of being inclusive and that the council should not view community input as just people saying no to plans. It’s important to ensure that residents’ voices are heard at the right time, that they have influence over decisions and that they can see their conversations reflected in those decisions.
- 6.7. However, whilst the council acknowledges it is important for residents to influence place-shaping priorities, a balance needs to be reached between residents vetoing planning decisions versus those people (on waiting list) who want to see more homes being built.
- 6.8. On influencing local Covid recovery place-shaping priorities, Centre for London⁹ suggests that enabling influence to be closer to communities improves the buy-in of public participation, accountability, responsiveness, and effectiveness thus leading to improved efficiencies. Bill Grimsey¹⁰ also make the case that community influence was a key pillar for the road map to recovery particularly for town centre high streets.
- 6.9. Social determinant factors also play a significant role in public health and will influence the shaping of local Covid recovery priorities. The Marmot review¹¹ suggests that participation and engagement at a community level improves people’s health, gives them a sense of control and delivers a catalyst of broader health outcomes. Therefore, engagement at locality level should embed a wellbeing framework that considers the social, physical and economical elements for place shaping priorities.

Recommendation 4

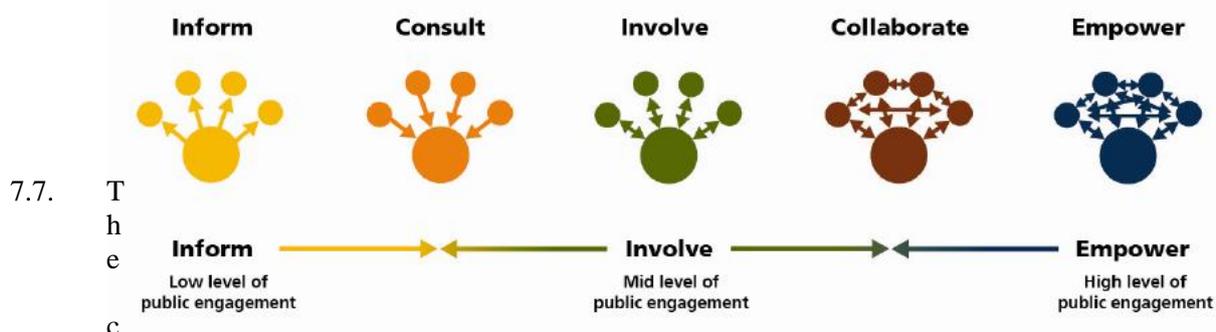
The council develops a geography-based partnership approach that brings collaboration from the council, public and private partners, VCS and others to pick up local priorities

[ACE-Local-Empowering-London-Neighbourhoods.pdf](#) ([centreforlondon.org](#))

¹⁰ [GrimseyReview2.pdf](#) ([vanishinghighstreet.com](#))

¹¹ [Health Equity in England The Marmot Review 10 Years On full report.pdf](#)

- 7.1. This should serve as an outlet for local residents to feed in their priorities and support a framework for them receiving regular updates on how their priorities are being considered. The approach also acts as a conduit, drawing out a range diverse views on local initiatives such as town centre high streets, liveable streets and the estates infill programme etc.
- 7.2. Centre for London provided the committee with an account of place-shaping priorities that affected local town centre high streets. They surmised that this goes beyond council operations and tends to involve businesses and other public sector anchor institutions alongside the third sector. The think tank further suggests that Covid-19 has played its role in changing the direction and shape of the UK and London economic geography. As more people spend more time in their own neighbourhoods as a result of working from home it has had a negative impact for some areas whilst for others it has produced some community benefits. The pandemic illustrated that the effectiveness of partnership working across geographies, and residents and communities collaborating using mutual aid and local volunteering to support those residents who were at risk, extremely vulnerable or shielding.
- 7.3. Centre for London also outlined that the retail sector had been in decline pre-pandemic as more people switched to online purchasing for ease and convenience. The issue here is that downward trend will continue, and town centre high streets will become unloved if there are no effective place-shaping interventions in place. Communities often play a key role in conveying local needs, how town centre high streets can attract and increase its footfall and public realm improvements.
- 7.4. Centre for London’s suggests that place-shaping should be based on principles rather than structure and that a geography-based approach to place shaping needs to form an open and genuine partnership between community, council and other stakeholders.
- 7.5. The committee commented that always viewing through the lens of consultation will default to extraction and if resident engagement only consists of going to groups for their opinions without leading to tangible changes then this will reduce confidence in engagement and have resource implications.
- 7.6. Figure 1 below sets out the ‘levels’ of participation and denotes that the higher up the chain (towards the right) the higher degrees of influence for those participating.



committee chair commented that interpretation of consultation and resident engagement varies across different groups of stakeholders. It may be a statutory obligation for the local authority but for residents it’s about being informed and having opportunities to contribute their views but that we should explore how we can use a partnership approach to help facilitate this.

- 7.8. The committee welcomed the potential of a geography-based partnership approach for place shaping. However, the committee questioned what the makeup of the baseline community would be, how this would be reflected, whether this should also include existing models such as the Tenants and Residents' Associations (TRA) and not to lose the valid contributions from those that are more actively engaged. Additionally, this would require an overall shift in the organisation's culture and thinking.
- 7.9. Centre for London cited some of the benefits of the Business Improvement Districts (BIDs) model as a geography partnership approach for delivering place-based priorities. The committee noted that businesses contribute towards a levy to raise extra funds for improvements to the area as a way to the local economy. Centre for London recommends the authority to consider the idea of developing Community Improvement Districts (CIDs), that could facilitate partnership working between local businesses, residents, local authorities and other stakeholders for place shaping.
- 7.10. The application of CIDs on place shaping enables:
- residents and community stakeholders to take more control, have a sense of ownership and responsibility and a greater say in the direction of their local highstreets and town centres; and
 - broader engagement may also support the local supply and demand for goods and services, increase the scope for community owned start-ups and support for campaigns.
- 7.11. Tower Hamlets CVS outlined the strengths of the partnership approach for responding to the pandemic. They informed the committee that moving away from a formal consultation process to a partnership delivery model enabled priorities to be delivered at pace at the time of real crisis. Being involved and able to influence the council's Covid response hierarchy structures helped to improve the rate of local engagement as communities heard from people like themselves and not the establishment.
- 7.12. Tower Hamlets CVS also highlighted that as a sector partner it was able to raise £10 million funds in the borough, and their view is that locality based partnership approach for different groups of stakeholders at different levels will not only facilitate engagement and recognition of peoples' contribution but actively support the delivery of local place shaping. Moving away from siloed ways of working to a more joined up approach will allow communities to have parity as equal partners and through incentivising the co-operation over competition will help to galvanise local partnerships, trust and collaborative behaviours across the boroughs' localities.