

CABINET

.MAYOR.

Mayor John Biggs

CABINET MEMBERS

Councillor Sirajul Islam	(Statutory Deputy Mayor and Cabinet Member for Housing Management & Performance)
Councillor Shiria Khatun	(Deputy Mayor and Cabinet Member for Community Safety)
Councillor Rachael Saunders	(Deputy Mayor and Cabinet Member for Education & Children's Services)
Councillor Rachel Blake	(Cabinet Member for Strategic Development)
Councillor Asma Begum	(Cabinet Member for Culture)
Councillor David Edgar	(Cabinet Member for Resources)
Councillor Ayas Miah	(Cabinet Member for Environment)
Councillor Joshua Peck	(Cabinet Member for Work & Economic Growth)
Councillor Amy Whitelock Gibbs	(Cabinet Member for Health & Adult Services)

MEETING DETAILS

Tuesday, 6 September 2016 at 5.30 p.m.
C1, 1st Floor, Town Hall, Mulberry Place, 5 Clove Crescent, London, E14 2BG

The meeting is open to the public to attend

Further Information

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Contact for further enquiries:

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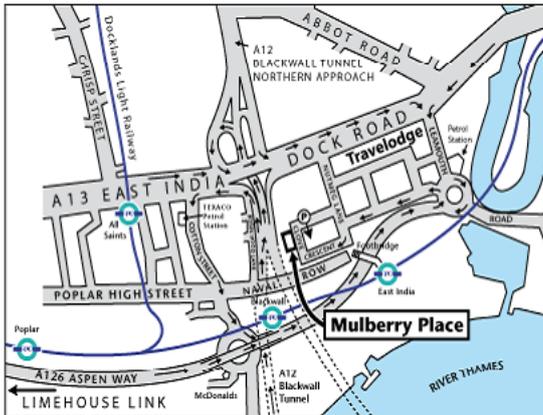
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A Guide to CABINET

Decision Making at Tower Hamlets

As Tower Hamlets operates the Directly Elected Mayor system, **Mayor John Biggs** holds Executive powers and takes decisions at Cabinet or through Individual Mayoral Decisions. The Mayor has appointed nine Councillors to advise and support him and they, with him, form the Cabinet. Their details are set out on the front of the agenda.

Which decisions are taken by Cabinet?

Executive decisions are all decisions that aren't specifically reserved for other bodies (such as Development or Licensing Committees). In particular, Executive Key Decisions are taken by the Mayor either at Cabinet or as Individual Mayoral Decisions.

The constitution describes Key Decisions as an executive decision which is likely

- a) to result in the local authority incurring expenditure which is, or the making of savings which are, significant having regard to the local authority's budget for the service or function to which the decision relates; or
- b) to be significant in terms of its effects on communities living or working in an area comprising two or more wards in the borough.

Upcoming Key Decisions are published on the website on the 'Forthcoming Decisions' page through www.towerhamlets.gov.uk/committee

Published Decisions and Call-Ins

Once the meeting decisions have been published, any 5 Councillors may submit a Call-In to the Service Head, Democratic Services requesting that a decision be reviewed. This halts the decision until it has been reconsidered.

- The decisions will be published on: **Thursday, 8 September 2016**
- The deadline for call-ins is: **Thursday, 15 September 2016**

Any Call-Ins will be considered at the next meeting of the Overview and Scrutiny Committee. The Committee can reject the call-in or they can agree it and refer the decision back to the Mayor, with their recommendations, for his final consideration.

Public Engagement at Cabinet

The main focus of Cabinet is as a decision-making body. However there is an opportunity for the public to contribute through making submissions that specifically relate to the reports set out on the agenda.

Members of the public may make written submissions in any form (for example; Petitions, letters, written questions) to the Clerk to Cabinet (details on the front page) by 5 pm the day before the meeting.

LONDON BOROUGH OF TOWER HAMLETS

CABINET

TUESDAY, 6 SEPTEMBER 2016

5.30 p.m.

	Pages
1. APOLOGIES FOR ABSENCE	
To receive any apologies for absence.	
2. DECLARATIONS OF DISCLOSABLE PECUNIARY INTERESTS	1 - 4
To note any declarations of interest made by Members, including those restricting Members from voting on the questions detailed in Section 106 of the Local Government Finance Act, 1992. See attached note from the Monitoring Officer.	
3. UNRESTRICTED MINUTES	5 - 20
The unrestricted minutes of the Cabinet meeting held on 26 th July, 2016 are presented for approval.	
4. OVERVIEW & SCRUTINY COMMITTEE	
4.1 Chair's Advice of Key Issues or Questions	
Chair of Overview and Scrutiny Committee (OSC) to report on any issues raised by the OSC in relation to unrestricted business to be considered.	
4.2 Any Unrestricted Decisions "Called in" by the Overview & Scrutiny Committee	
(Under provisions of Article 6 Para 6.02 V of the Constitution).	
5. UNRESTRICTED REPORTS FOR CONSIDERATION	
5.1 Medium Term Financial Strategy 2017 - 2020	21 - 32
5.2 Best Value Action Plan Update, September 2016	33 - 54
5.3 Boroughwide 20mph Limit	55 - 142
5.4 Social Impact Bond Pan-London Care Impact Partnership	143 - 156
5.5 Procurement of Cleaning and Associated Services Contract	157 - 170

5.6	Housing Strategy 2016 - 2021	171 - 266
5.7	Planning for School Places - 2016/17 Review	267 - 284
5.8	Report of the Overview and Scrutiny Committee: Improving disabled and ethnic minority staff representation at the senior manager (LP07+) level	285 - 308
5.9	Promoting a shared responsibility and removing barriers to improved recycling in the borough - scrutiny report	309 - 360
5.10	Corporate Directors Decisions	361 - 366

6. ANY OTHER UNRESTRICTED BUSINESS CONSIDERED TO BE URGENT

7. EXCLUSION OF THE PRESS AND PUBLIC

In view of the contents of the remaining items on the agenda, the Committee is recommended to adopt the following motion:

“That, under the provisions of Section 100A of the Local Government Act, 1972 as amended by the Local Government (Access to Information) Act, 1985, the Press and Public be excluded from the remainder of the meeting for the consideration of the Section Two business on the grounds that it contains information defined as Exempt in Part 1 of Schedule 12A to the Local Government, Act 1972”.

EXEMPT/CONFIDENTIAL SECTION (PINK)

The Exempt / Confidential (Pink) Committee papers in the Agenda will contain information, which is commercially, legally or personally sensitive and should not be divulged to third parties. If you do not wish to retain these papers after the meeting, please hand them to the Committee Officer present.

8. EXEMPT / CONFIDENTIAL MINUTES

Nil items

9. OVERVIEW & SCRUTINY COMMITTEE

9.1 Chair's Advice of Key Issues or Questions in Relation to Exempt / Confidential Business

Chair of Overview and Scrutiny Committee (OSC) to report on any issues raised by the OSC in relation to exempt/confidential business to be considered.

9.2 Any Exempt / Confidential Decisions "Called in" by the Overview & Scrutiny Committee

(Under provisions of Article 6 Para 6.02 V of the Constitution).

10. **EXEMPT / CONFIDENTIAL REPORTS FOR CONSIDERATION**

11. **ANY OTHER EXEMPT/ CONFIDENTIAL BUSINESS CONSIDERED TO BE URGENT**

Agenda Item 2

DECLARATIONS OF INTERESTS - NOTE FROM THE MONITORING OFFICER

This note is for guidance only. For further details please consult the Members' Code of Conduct at Part 5.1 of the Council's Constitution.

Please note that the question of whether a Member has an interest in any matter, and whether or not that interest is a Disclosable Pecuniary Interest, is for that Member to decide. Advice is available from officers as listed below but they cannot make the decision for the Member. If in doubt as to the nature of an interest it is advisable to seek advice **prior** to attending a meeting.

Interests and Disclosable Pecuniary Interests (DPIs)

You have an interest in any business of the authority where that business relates to or is likely to affect any of the persons, bodies or matters listed in section 4.1 (a) of the Code of Conduct; and might reasonably be regarded as affecting the well-being or financial position of yourself, a member of your family or a person with whom you have a close association, to a greater extent than the majority of other council tax payers, ratepayers or inhabitants of the ward affected.

You must notify the Monitoring Officer in writing of any such interest, for inclusion in the Register of Members' Interests which is available for public inspection and on the Council's Website.

Once you have recorded an interest in the Register, you are not then required to declare that interest at each meeting where the business is discussed, unless the interest is a Disclosable Pecuniary Interest (DPI).

A DPI is defined in Regulations as a pecuniary interest of any of the descriptions listed at **Appendix A** overleaf. Please note that a Member's DPIs include his/her own relevant interests and also those of his/her spouse or civil partner; or a person with whom the Member is living as husband and wife; or a person with whom the Member is living as if they were civil partners; if the Member is aware that that other person has the interest.

Effect of a Disclosable Pecuniary Interest on participation at meetings

Where you have a DPI in any business of the Council you must, unless you have obtained a dispensation from the authority's Monitoring Officer following consideration by the Dispensations Sub-Committee of the Standards Advisory Committee:-

- not seek to improperly influence a decision about that business; and
- not exercise executive functions in relation to that business.

If you are present at a meeting where that business is discussed, you must:-

- Disclose to the meeting the existence and nature of the interest at the start of the meeting or when the interest becomes apparent, if later; and
- Leave the room (including any public viewing area) for the duration of consideration and decision on the item and not seek to influence the debate or decision

When declaring a DPI, Members should specify the nature of the interest and the agenda item to which the interest relates. This procedure is designed to assist the public's understanding of the meeting and to enable a full record to be made in the minutes of the meeting.

Where you have a DPI in any business of the authority which is not included in the Member's register of interests and you attend a meeting of the authority at which the business is considered, in addition to disclosing the interest to that meeting, you must also within 28 days notify the Monitoring Officer of the interest for inclusion in the Register.

Further advice

For further advice please contact:-

- Melanie Clay, Corporate Director, Law, Probity and Governance. Tel 020 7364 4800

APPENDIX A: Definition of a Disclosable Pecuniary Interest

(Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012, Reg 2 and Schedule)

Subject	Prescribed description
Employment, office, trade, profession or vacation	Any employment, office, trade, profession or vocation carried on for profit or gain.
Sponsorship	<p>Any payment or provision of any other financial benefit (other than from the relevant authority) made or provided within the relevant period in respect of any expenses incurred by the Member in carrying out duties as a member, or towards the election expenses of the Member.</p> <p>This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.</p>
Contracts	<p>Any contract which is made between the relevant person (or a body in which the relevant person has a beneficial interest) and the relevant authority—</p> <p>(a) under which goods or services are to be provided or works are to be executed; and</p> <p>(b) which has not been fully discharged.</p>
Land	Any beneficial interest in land which is within the area of the relevant authority.
Licences	Any licence (alone or jointly with others) to occupy land in the area of the relevant authority for a month or longer.
Corporate tenancies	<p>Any tenancy where (to the Member's knowledge)—</p> <p>(a) the landlord is the relevant authority; and</p> <p>(b) the tenant is a body in which the relevant person has a beneficial interest.</p>
Securities	<p>Any beneficial interest in securities of a body where—</p> <p>(a) that body (to the Member's knowledge) has a place of business or land in the area of the relevant authority; and</p> <p>(b) either—</p> <p>(i) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or</p> <p>(ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the relevant person has a beneficial interest exceeds one hundredth of the total issued share capital of that class.</p>

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LONDON BOROUGH OF TOWER HAMLETS

MINUTES OF THE CABINET

HELD AT 5.40 P.M. ON TUESDAY, 26 JULY 2016

**C1, 1ST FLOOR, TOWN HALL, MULBERRY PLACE, 5 CLOVE CRESCENT,
LONDON, E14 2BG**

Members Present:

Mayor John Biggs	
Councillor Sirajul Islam	(Statutory Deputy Mayor and Cabinet Member for Housing Management & Performance)
Councillor Shiria Khatun	(Deputy Mayor and Cabinet Member for Community Safety)
Councillor Rachael Saunders	(Deputy Mayor and Cabinet Member for Education & Children's Services)
Councillor Rachel Blake	(Cabinet Member for Strategic Development)
Councillor David Edgar	(Cabinet Member for Resources)
Councillor Ayas Miah	(Cabinet Member for Environment)
Councillor Amy Whitelock Gibbs	(Cabinet Member for Health & Adult Services)

Other Councillors Present:

Councillor Peter Golds	(Leader of the Conservative Group)
Councillor John Pierce	

Apologies:

Councillor Asma Begum	(Cabinet Member for Culture)
Councillor Joshua Peck	(Cabinet Member for Work & Economic Growth)

Others Present:

Officers Present:

Mirsad Bakalovic	(Head of Parking, Mobility and Transport, Communities, Localities and Culture)
Katherine Ball	(Senior Accountant, Development & Renewal)
Zena Cooke	(Corporate Director, Resources)
David Courcoux	(Deputy Head of Mayor's Office)
Aman Dalvi	(Corporate Director, Development & Renewal)
Shazia Hussain	(Service Head Culture, Learning and Leisure, Communities Localities & Culture)
Debbie Jones	(Corporate Director, Children's Services)
David Knight	(Senior Democratic Services Officer)
Paul Leeson	(Finance Manager, Development & Renewal)
Adele Maher	(Strategic Planning Manager, Development and

Niall McGowan	Renewal)
Neville Murton	(Housing Regeneration Manager)
Jackie Odunoye	(Service Head, Finance & Procurement)
	Service Head, Strategy, Regeneration &
	Sustainability, Development and Renewal
Denise Radley	(Director of Adults' Services)
Peter Robbins	Head of Mayor's office
Rachael Sadegh	(DAAT Manager, Community Safety Service,
	Communities Localities & Culture)
Sripriya Sudhakar	(Development Design & Conservation Officer,
	Development and Renewal)
Ann Sutcliffe	(Service Head Corporate Property and Capital
	Delivery, Development and Renewal)
Will Tuckley	(Chief Executive)
Joel West	(Senior Democratic Services Officer)
Graham White	(Interim Service Head, Legal Services, Law, Probity
	and Governance)
Matthew Mannion	(Committee Services Manager, Democratic
	Services, Law, Probity and Governance)

AGENDA ORDER

During the meeting the **Mayor** agreed to change the order of business to allow items with public speakers to be taken first. To aid clarity the minutes are presented in the order the items appeared on the agenda.

At the meeting, after Agenda Item 4 (Overview and Scrutiny Committee) the **Mayor** took Agenda Item 5.9 (Lease for the Osmani Centre) next, followed by Agenda Item 5.4 (Substance Misuse Strategy Report). All other items were then taken in order starting with Agenda Item 5.1 (Parking CPZ Policy Review Project).

1. APOLOGIES FOR ABSENCE

Apologies for absence were received on behalf of:

- Councillor Asma Begum (Cabinet Member for Culture)
- Councillor Joshua Peck (Cabinet Member for Work and Economic Development)
- Melanie Clay (Corporate Director, Law, Probity and Governance)

2. DECLARATIONS OF DISCLOSABLE PECUNIARY INTERESTS

None were declared.

3. UNRESTRICTED MINUTES

RESOLVED

1. That the unrestricted minutes of the Cabinet meeting held on Tuesday 14 June 2016 be agreed and signed by the Chair as a correct record of proceedings.

4. OVERVIEW & SCRUTINY COMMITTEE

4.1 Chair's Advice of Key Issues or Questions

Councillor John Pierce, Chair of the Overview and Scrutiny Committee, provided an update on their meeting the previous week. He reported on a number of items including that:

- The Committee had considered their workplan for the year ahead and that there were also workplans for the Health and Housing Sub-Committees.
- Councillor Shiria Khatun, as Cabinet Member for Community Safety, had attended a useful discussion on the substance misuse strategy. It was noted that Tower Hamlets was considered a good example for other authorities to follow.
- The Committee had mixed views about the proposed Youth Service model and that they were exploring options for a challenge session on the issue.
- Councillor David Edgar, Cabinet Member for Resources, had attended for a discussion on the Provisional Financial Outturn for 2015/16.
- The Mayor had attended for a review of the end of year Strategic Monitoring Report and in particular they discussed developments in charging for adult social care services and how to learn from other boroughs who had introduced charging.

The **Mayor** thanked Councillor John Pierce for his update and for the work of the Overview and Scrutiny Committee over the last year.

4.2 Any Unrestricted Decisions "Called in" by the Overview & Scrutiny Committee

Nil items.

5. UNRESTRICTED REPORTS FOR CONSIDERATION

5.1 Parking CPZ Policy Review Project

Councillor Ayas Miah, Cabinet Member for Environment, introduced the report reviewing the Council's Controlled Parking Zone (CPZ) policy. He reported that the review had been ongoing for two years and included an independent survey of the Borough. There were now a number of recommendations proposed. He also highlighted that on Recommendations 9 and 13 the **Mayor** was being asked to choose from the options provided.

The Pre-Decision Scrutiny Questions were noted and in particular it was agreed that as a general point officers should be looking to consult with Ward Councillors more regularly irrespective of whether it was a statutory requirement.

The **Mayor** then took Cabinet through the recommendations individually. He did not agree Recommendation 5 on parking across demarcation lines, Recommendation 9 on All Day Visitor Voucher charging or Recommendation 10 on the petition framework as he considered they all required further discussion.

For Recommendation 13 on consultation areas, the **Mayor** considered Option 3 was the most appropriate of those listed but asked officers to consider whether there were other high use areas that should also be consulted.

The **Mayor** then **agreed** the recommendations as amended.

RESOLVED

1. To agree to the reduction of the number of free bays available for domestic bay suspensions from three to two (as per section 3.5 of the report).
2. To agree to the amendment of the Penalty Charge Notice ('PCN') cancellation criteria for vehicles in contravention that are displaying valid Blue Badges such that:
 - 2.1. the first PCN to such vehicles is no longer cancelled automatically but that representations are assessed on a case-by-case basis; and
 - 2.2. a warning notice is issued instead of a PCN where the vehicle is seen in contravention within seven days of the expiry of the Blue Badge.
(as per section 3.6 of the report)
3. To agree to the amendment of the terms and conditions for all permit types whereby, following a three month notice period given in writing, the Council can revoke any current permit without a refund and / or withhold issuing further permits issued to Persistent Evader Vehicles (as per section 3.7 of the report).
4. To agree to the amendment of the removals priority list such that vehicles that have remained in a permit or pay and display bay, whilst contravening the restrictions in place, for more than two consecutive days are removed as a primary priority (as per section 3.8 to the report).
5. At this stage not to agree on enforcement against vehicles parked across a demarcation line between two individual parking bays (as per section 3.9 of the report) to allow for further discussion
6. To agree to reintroduce pay & display charges for vehicles parking at weekends in market areas (as per section 3.10 to the report).
7. To agree to introduce an all-zone multi-purpose permit type for the use of car club companies whose business model permits vehicles to be picked up and dropped off at any location in Tower Hamlets or other participating authorities (as per section 3.11 to the report).
8. To agree to introduce a maximum limit of three permits per household and to introduce surcharges for second and third permits, with concessions for

Blue Badge holders and a grace period for households with more than 3 cars of one permit renewal cycle (as per section 3.12 to the report).

9. To request further consideration of the proposal to introduce an all-day visitor's voucher at the full pay and display rate (as per section 3.12.9 of the report).
10. To not at this stage agree the introduction of a petition scheme framework and assessment criteria for the implementation of parking restrictions as well as the formalisation of current arrangements. (as per section 3.14 of the report).
11. To agree that a maximum period of time should be implemented for any advisory relaxation of enforcement arrangements. It is suggested that this be a maximum of two days over a weekend (including Bank Holiday weekends) or one working week day.
12. To note that officers intent to engage the Market with respect to electric vehicle charging point bays and to implement such arrangements as are considered the best technical and strategic fit for the Borough subject to further Executive Review (as per section 3.15 to the report).
13. To agree to consult with residents regarding amending the restricted parking times as set out in section 3.16.6.3 of the report and for officers to also consider consultation in other busy areas such as Shoreditch, near the Olympic Stadium and behind the Royal London Hospital. Officers also to note that Members considered it appropriate to have different hours of restriction in different parts of the Borough.

Action by:

**CHIEF EXECUTIVE AND ACTING CORPORATE DIRECTOR,
COMMUNITIES, LOCALITIES AND CULTURE (W. TUCKLEY)**

(Head of Parking, Mobility and Transport Services (M. Bakalovic))

5.2 Sheltered Housing Options Paper

Councillor Amy Whitelock Gibbs, Cabinet Member for Health and Adult Services, introduced the report. She explained how the report proposed a new model of sheltered housing provision moving to a floating support model which would allow more flexibility and was more financially sustainable. She noted the significant growth in the over 60s population and the likely increase in demand for sheltered housing. She also highlighted that continuity of care for service users was being built into the contracts.

The **Mayor** welcomed the report but expressed concern about the extent to which existing service users understood the levels of service they would be receiving. He considered that further discussion with service users was required. The **Mayor agreed** the report's recommendation in principle but asked that further consultation take place including with himself and the Lead Member before the recommendations be actioned.

RESOLVED

1. To agree in principle to proceed to move to a new model outlined in **Option 4** and authorise, following further consultation with the Mayor and Lead Cabinet Member, the initiation of a tender process for a visiting floating support service and subsequent awarding of contract, subject to best value consideration being met by bids received, in respect of the sheltered housing schemes listed in this report (noting that a short extension to some contracts may be required in order to complete the tendering process).

5.3 Hostels Commissioning Plan - Post Consultation

Councillor Amy Whitelock Gibbs, Cabinet Member for Health and Adult Services, introduced the report. She explained that this followed on from a report presented to Cabinet in May which agreed the high level principles but which asked for a public consultation to take place. This item was reporting back on that consultation. A key highlight on the consultation findings was that they supported the proposed new commissioning model.

The **Mayor** thanked the Lead Member for her work on this issue and he **agreed** the recommendations as set out in the report.

RESOLVED

1. To approve the remodelling of the hostel provision.
2. To agree the reconfiguring of the hostel provision to enable implementation of the new model.
3. Subject to legal and procurement approval to:
 - a. Exempt Providence Row Housing Association (PRHA) for up to 3 years and the Salvation Army for up to 5 years (3 + 1 + 1 year contract) from any tendering exercise relating to the improved and / or reconfigured provision at Edward Gibbons House, Hopetown Hostel and Riverside House in recognition of the significant capital investment to improve the quality and design of the existing buildings.
 - b. Vary the existing contracts at Hopetown and Booth House should it be necessary to provide continuity of support whilst the reconfiguration programme is being implemented.
 - c. Commence the procurement programme to achieve the recommendations as set out above.

5.4 Substance Misuse Strategy Report

Councillor Shiria Khatun, Cabinet Member for Community Safety, introduced the report on the Substance Misuse Strategy. She highlighted that the current strategy expired in March 2016 and so a new Strategy was required. She

explained that following Cabinet, the Strategy would be presented to Council for approval.

The Strategy had undergone consultation with residents, service users and partners and had been signed off by the Community Safety Partnership.

The overall structure of the existing strategy had been retained but there had been amendments. For example, the drug and alcohol chapters had been integrated and there had been a review of the consistency and quality of information provided.

During discussion officers noted that as well as the three year strategy there was a yearly action plan that would be monitored by the DAAT Board.

The **Mayor** noted the concerns of service users who were seeing their services change and officers confirmed they were working to minimise the impact of those changes. The **Mayor agreed** the recommendations as set out in the report.

RESOLVED

1. To note that the Substance Misuse Strategy 2016-2019 is part of the Crime and Disorder Reduction Strategy in Tower Hamlets (the Community Safety Plan);
2. To note that as the Substance Misuse Strategy 2016-2019 is part of the Crime and Disorder Reduction Strategy then pursuant to the Council's Budget and Policy Framework Procedure Rules, the Mayor as the Executive has responsibility for preparing the draft strategy for submission to the full Council to adopt;
3. To note that the Action Plan is due to go to the DAAT Board on 11th July 2016 to be further developed;
4. To note that the draft Substance Misuse Strategy 2016-2019 and Action Plan will be referred to the strategic partners for approval that the Strategy be adopted by their respective organisations;
5. Having given careful analysis to the consultation response, to approve the draft Substance Misuse Strategy 2016-2019 as drafted and recommend it to Full Council for adoption; and
6. To note that if any further changes are made to the draft Substance Misuse Strategy 2016-2019 or if, for any reason, any of the strategic partners do not approve the Strategy then a further report must be submitted to Cabinet for the Mayor to consider and make a fresh recommendation to Full Council.

5.5 Public Health Savings Proposals for Decision

Councillor Amy Whitelock Gibbs, Cabinet Member for Health and Adult Services, introduced the report on Public Health Savings Proposals. She thanked officers for their hard work on this issue.

She explained that, following discussion at the May Cabinet meeting, detailed savings proposals to deal with the £5 Million funding cut from the government had now been consulted upon. The overall response to the consultation had been concern about the impact of the cuts but there was recognition of the robust methodology and consultation processes used to take views on board.

One specific concern highlighted was around the impact of potential cuts to breastfeeding support services. Following further discussion it was proposed to remove that cut from the list. The financial impact of that change was manageable but would require additional savings in phase 2.

The **Mayor** thanked the Lead Member and officers. He expressed his dissatisfaction with having to make cuts to services due to government funding reductions. He **agreed** the recommendations with the proposed amendment around breastfeeding services.

RESOLVED

1. To consider the consultation feedback and service responses set out in ANNEX B to the report.
2. With the exception of the Breast Feeding Support services to agree to implement the savings as set out in the templates in ANNEX A to the report.

5.6 Blackwall Reach Regeneration Project: Update Budget Report

Councillor Rachel Blake, Cabinet Member for Strategic Development, introduced the report. The **Mayor** welcomed the report as a demonstration of good regeneration work the Council was engaged in. He **agreed** the recommendations as set out in the report.

RESOLVED

1. To note the update on scheme delivery and the Council's CPO in paragraphs 3.2.1 to 3.2.12 of the report.
2. To note the update on actual and projected expenditure, scheme funding and potential overage in paragraphs 3.3.1 – 3.3.14 of the report.
3. To approve an increase in the capital budget for the scheme to £20.3 million, as set out in paragraphs 3.3.2 to 3.3.8 of the report.

5.7 Addendums to Character Appraisals and Management Plans for six conservation areas- Chapel House, Fairfield Road, Jesus Hospital Estate, Tredegar Square, Victoria Park and York Square.

The **Mayor** introduced the report on proposed addendums to conservation area Character Appraisals.

Councillor Peter Golds, Leader of the Conservative Group, addressed the meeting. He expressed concern about the proposed impact of the changes on the Chapel House Conservation Area.

The **Mayor** noted the Pre-Scrutiny question and written response and in particular the need for more pro-active engagement of Ward Councillors.

The **Mayor** agreed the recommendations as set out in the report.

RESOLVED

1. To approve Addendums to the following six Conservation Areas Management Plans:
 - a. Chapel House
 - b. Fairfield Road
 - c. Jesus Hospital Estate
 - d. Tredegar Square
 - e. Victoria Park
 - f. York Square

2. To note that further research is being undertaken to more fully explore the potential for extensions for family homes in Driffield Road and Medway conservation areas, with particular focus on roof extensions.

5.8 Disposal of 255-279 Cambridge Heath Road, London, E2 0HG

Councillor David Edgar, Cabinet Member for Resources, introduced the report on the disposal of 255 – 279 Cambridge Heath Road on a 199 year lease. During discussion the **Mayor** agreed to an amendment to Recommendation 3 to provide for the inclusion of a planning brief.

During discussion the **Mayor** explained that the Council was spending a lot of money on buildings that were no longer useful to it and that detailed evaluation had been undertaken on the best way of disposing of this site.

The **Mayor** also agreed that an appendix to the report was restricted due to the financial information contained therein and he noted the contents of that appendix. Finally, he **agreed** the recommendations as set out in the report subject to the above amendment on the inclusion of a planning brief.

RESOLVED

1. To note the contents of this report;

2. To agree that the land and buildings at 255 – 279 Cambridge Heath Road, E2 0HQ (as shown on the plan in Appendix A to the report) are surplus to requirements;

3. To agree to the disposal of the site by informal tender but with a planning brief to be provided;
4. To agree to the disposal of the site on a 199 year lease;
5. To authorise the Corporate Director, Development & Renewal, to appoint external agents to support the marketing of the site;
6. To authorise the Corporate Director, Development and Renewal to accept the best tender return for the site on conclusion of the marketing exercise;
7. To authorise the Corporate Director, Development and Renewal, to agree the precise boundary of the land to be sold in order to implement the recommendations above.
8. To authorise the Corporate Director, Development and Renewal, following consultation with the Corporate Director of Law Probity and Governance, to agree the terms and conditions of any agreements required to implement the recommendations above.
9. To note that the Direction issued by the Minister on 17th December 2014 requires the Council, until 31st March 2017, to “.... *Obtain the prior written agreement of the Commissioners **before*** [emphasis added] *entering into any commitment to dispose of, or otherwise transfer to third parties, any real property other than exisiting single dwellings for the purposes of residential occupation*”. This report relates to the disposal of land through the sale of a lease and accommodation written consent of the Commissioners will be required before any sale can take place.

5.9 Lease for the Osmani Centre

Councillor David Edgar, Cabinet Member for Resources, introduced the report. He explained that the proposed agreement would provide a stable basis for the centre for the next few years. The lease also provided scope to think about use of the site by youth services if that was found to be useful.

Shafiur Rahman, Executive Director of the Osmani Trust, provided a submission to Cabinet. He welcomed the opportunity to agree a lease but highlighted concerns about the deadlines being set due to the holiday period and the need to understand recent changes made to the lease by the Council.

The **Mayor** noted that the deadline to sign the lease had been set by the Commissioners. He agreed that discussions could take place to see if the deadline could be extended if that proved necessary but that it was a decision for the Commissioners to take.

During discussion it was also proposed that the first recommendation be amended to allow final consultation with the Lead Member and Mayor before the process was concluded.

The **Mayor agreed** the proposed amendment and then agreed the recommendations.

RESOLVED

1. Following consultation with the Mayor and Lead Member, to authorise the Corporate Director, Development & Renewal, to conclude a lease of the site known as the Osmani Centre, 58 Underwood Road, London, E1 5AW to the Osmani Trust;
2. To agree that the lease will be for a 25-year term, commencing 1st August 2011;
3. To agree that the lease will incorporate a four-year rent free period from commencement and the rent in the fifth year will be £46,000;
4. To agree that the rent from 1st August 2016 should be the open market rental value for community use;
5. To agree that the lease should incorporate a landlord's (and tenant's, if requested) option to break by giving to the tenant (or landlord) not less than 12 months' notice in writing;
6. To agree that the lease is to be excluded from the security of tenure provisions of the Landlord and Tenant Act 1954 at the end of the 25-year term;
7. In the event of failure to conclude the lease on the above terms by 31st August 2016, to authorise the Corporate Director, Development & Renewal, to seek to recover possession of the property on behalf of the Council; and
8. To note that under the Directions issued to the Council by the Secretary of State for Communities and Local Government in 2014, the Council will need to secure the prior written agreement of the DCLG-appointed Commissioners before entering into the lease.

5.10 HRA - review of medium term financial strategy and 30 year business plan

Councillor David Edgar, Cabinet Member for Resources, introduced the report. He highlighted that it responded to the report of the Affordability Commission and set out new ways of delivering homes including approval in principle to acquire new homes from developers. The report set out details on the 30 year business plan and notes levels of uncertainty for the future such as proposed government plans on requiring higher income tenants to make contributions.

The **Mayor** noted that there were lots of issues to consider in ensuring a viable housing revenue account and a number of discussions had taken place. He **agreed** the recommendations as set out.

RESOLVED

1. To note the updated HRA financial outlook and 30 year business plan base case as set out in section 5, and note the resulting medium-term projections detailed in Appendix 1, including the assumptions regarding new-build and the capital requirements relating to maintaining the existing stock.
2. To note that, as outlined in section 6 of the report, and detailed in Appendix 2 to the report, although the Housing and Planning Act has been enacted, the financial impact on the HRA of the High Value Void levy and Pay to Stay is not known, although some assumptions have been made for modelling purposes. A further review of the business plan will be brought back to Cabinet for consideration when full details have been published
3. To agree the HRA medium-term financial plan net savings target of £1 million per annum over the period of the medium-term plan period, in addition to the £2 million of savings already assumed in 2017/18.
4. To note the financial impact on the HRA of developing new housing and letting at social rent, as outlined in paragraphs 9.18 to 9.22, and agree the appropriate mix of social and 'Living' rents as set out at 9.34 to the report.
5. To agree a disposal programme of up to five HRA properties per year as an initial response to the requirement to sell vacant higher value Council stock, as set out in paragraphs 9.30 to 9.33 to the report.
6. To agree to incorporate a capital budget of £89.92m (inclusive of fees, on costs and a level of contingencies) into the capital programme for the new build construction at the Hereford, Locksley, Baroness, Jubilee, Tent Street and Arnold Road sites to deliver 270 new homes as set out in section 9. This replaces the total budgets of £48.157m that were previously agreed for Hereford, Locksley, Baroness and Jubilee and for preliminary works at Tent Street and Arnold Road.
7. To agree that approval to proceed to award contracts be delegated to the Corporate Director, Development & Renewal and the Corporate Director, Law Probity & Governance, subject to the tenders being within the capital estimate amount. In addition, note that, in relation to the Arnold Road site, additional relocation costs are likely to be incurred, to be determined, to be funded from General Fund resources.
8. To note that, in relation to the Hereford scheme, the scheme is still subject to final sign off following consultation with residents on the final scheme layout and number of units.

9. To approve the principle of acquiring Section 106 affordable units from developers, and authorise officers to negotiate with both Registered Providers and the developers on a potential acquisition in relation to the two sites outlined in 9.12 to 9.17 to the report.
10. To note that a future report will be submitted to Cabinet regarding the setting up of a housing company or companies to help deliver the Authority's strategic objectives, as detailed in section 10 of the report.
11. To note that as part of the review to identify savings within the HRA, the Accommodation SLA will be examined, there is a likelihood that the General Fund will be affected, as highlighted at 11.3 of the report.

5.11 Single Equality Framework

The **Mayor** introduced the Single Equality Framework report he noted that it set out how the Council met the Public Sector Equality Duty. He **agreed** the recommendation as set out.

RESOLVED

1. To approve the draft Single Equality Framework

5.12 Procurement Strategy 2016-2019

Councillor David Edgar, Cabinet Member for Resources, introduced the report. He welcomed the proposed new procurement strategy and stated that the report set out why this was a good way of approaching procurement for the Council.

The **Mayor** reported that there had been lengthy discussions with officers and in particular thanked Zamil Ahmed, Head of Procurement, for his efforts. He also explained that the Commissioners had been fully involved in the discussions. He **agreed** the recommendations as set out.

RESOLVED

1. To agree the new Corporate Procurement Strategy 2016-19
2. To agree for the development of an overarching Commissioning and Procurement Strategy by the end of the current financial year.

5.13 Strategic Performance Monitoring Q4 and Year End 2015/16

The **Mayor** introduced the report on the Council's Strategic Performance Monitoring. He noted that this had been pre-scrutinised by the Overview and Scrutiny Committee and that their concerns around a number of issues including staff sickness had been noted. He **agreed** the recommendations as set out.

RESOLVED

1. To note the performance of the Strategic Measures at the end of year stage (appendix 1 to the report);
2. To note the progress in delivering the Strategic Plan at the end of year stage (appendix 2 to the report).

5.14 The Council's Provisional Financial Outturn 2015/16

Councillor David Edgar, Cabinet Member for Resources, introduced the report. He welcomed the increased level of detail that was now being included in the report. Examining the report he noted that

- The expected use of £8 Million of reserve had not been required.
- There had been slippages in the Capital Budget, and the reasons were set out in the report.
- There was an underspend in the Housing Revenue Account.

The **Mayor** noted the challenging financial environment the Council was facing over the next few years and he **agreed** the recommendations as set out in the report.

RESOLVED

1. To note the Council's revenue and capital financial outturn position as detailed in Sections 3 to 7 and Appendices 1-6 of the report.
2. To endorse the proposed transfers to and from reserves as reflected in Appendix 5 to the report.

5.15 Grants Decision Making - Transitional Arrangements

Councillor Rachael Saunders, Deputy Mayor with specific responsibility for Grants and the Third Sector, introduced the report proposing Transitional Arrangements for the Council's Grants decision making processes.

She highlighted the importance of agreeing new processes so that grants decision making could gradually be taken back under the control of the Council. The report set out plans for new decision making meetings chaired by the Mayor with the Commissioners, Cabinet Members and the Chair of the Overview and Scrutiny Committee also in attendance.

Councillor Peter Golds, Leader of the Conservative Group, welcomed the steps proposed to bring decision making back to the Council but highlighted the importance of ensuring that, after the Commissioners had left, grants decision making remained in public so that it could be properly monitored and challenged. It was also vital to ensure there was no expectation of favours for awarded grants.

During discussion the Mayor and Lead Member agreed on the importance of transparency to reassure the public on how grants were being processed and awarded and that the auditing process was also extremely important.

The **Mayor** thanked Councillor Peter Golds for his efforts in holding the executive, and the previous administration, to account.

The **Mayor agreed** the recommendation as set out in the report.

RESOLVED

1. To agree the proposed transitional arrangements for Grants Decision Making as set out in paragraphs 3.11 to 3.14 of this report.

5.16 Contracts Forward Plan - Quarter 2 (2016-2017)

Councillor David Edgar, Cabinet Member for Resources, introduced the report. He asked that should Cabinet require it they inform him of any reports they would like written on the listed contracts before they proceeded to tender.

The **Mayor** confirmed with Members that they were content for all listed contracts to proceed to tender.

RESOLVED

1. To agree that all contracts listed in Appendix 1 to the report can proceed to contract award after tender.
2. To authorise the Service Head, Legal Services, to execute all necessary contract documents in respect of the awards of contracts referred to in recommendation 1 above.

5.17 Corporate Directors Decisions

The **Mayor** noted the listed decision and **agreed** the recommendation as set out.

RESOLVED

1. To note the Corporate Directors' decisions set out in Appendix 1 to the report.

5.18 List of Executive Mayoral Decisions

The **Mayor** noted the individual decisions listed and **agreed** the recommendation as set out.

RESOLVED

1. To note the Individual Mayoral Decisions set out in Appendix 1.

6. ANY OTHER UNRESTRICTED BUSINESS CONSIDERED TO BE URGENT

Nil items.

7. EXCLUSION OF THE PRESS AND PUBLIC

No motion to exclude the press and public was passed.

8. EXEMPT / CONFIDENTIAL MINUTES

Nil items.

9. OVERVIEW & SCRUTINY COMMITTEE

9.1 Chair's Advice of Key Issues or Questions in Relation to Exempt / Confidential Business

Nil items.

9.2 Any Exempt / Confidential Decisions "Called in" by the Overview & Scrutiny Committee

Nil items.

10. EXEMPT / CONFIDENTIAL REPORTS FOR CONSIDERATION

10.1 Approval for costs in relation to CPO Public Inquiry (Arvin and sons Ltd)

Note – the Mayor agreed the report was exempt due to the financial information contained therein but considered the item in public session.

The recommendations set out in the report were agreed.

11. ANY OTHER EXEMPT/ CONFIDENTIAL BUSINESS CONSIDERED TO BE URGENT

Nil items.

The meeting ended at 7.51 p.m.

MAYOR JOHN BIGGS

<p>Cabinet</p> <p>6 September 2016</p>	 <p>TOWER HAMLETS</p>
<p>Report of: Zena Cooke (Corporate Director of Resources)</p>	<p>Classification: Unrestricted</p>
<p>Medium Term Financial Strategy 2017 - 2020</p>	

Lead Member	Councillor Edgar, Cabinet Member for Resources
Originating Officer(s)	Neville Murton (Service Head Finance and Procurement)
Wards affected	All
Key Decision?	No
Community Plan Theme	[State Theme]

Executive Summary

In February 2016 the Council agreed its budget for 2016/17 and set out a Medium Term Financial Strategy (MTFS) covering the period to 2020. The MTFS identified that further savings of c£60m were required over that period in order to deliver a balanced budget position in each of the years.

Since that time the Council has been considering its approach to financial planning in the light of a number of issues including the offer of a four year ‘guaranteed’ financial settlement from the government.

The planning stability offered by that guarantee has been used as a catalyst to extend the financial planning horizon to cover the period 2017 – 2020 and develop revenue proposals aimed at establishing a balanced MTFS. In support of that aspiration the Council has adopted a far more strategic approach to prioritising its resources Outcomes Based Budgeting and more effectively identify savings proposals. The Council has also recognised the need to adopt a similar outcome based approach to its use of Capital resources alongside the development of its revenue budget.

This report updates the Cabinet on the progress to date and sets out the next steps in this process aimed at consulting on and agreeing a balanced budget position across the MTFS period (2017 – 2020) as part of its budget setting process which will conclude in February 2017. As in previous years this will also include proposals relating to the Council’s Housing Revenue Account (HRA) including rent setting considerations and the Dedicated Schools Budget (DSB) strategy.

Recommendations:

The Mayor in Cabinet is recommended to:

1. Endorse the Council's Outcomes Based Budgeting approach to prioritising resources and the move to a rolling multi-year Medium Term Financial Strategy from 2017-18 to 2019-2020.
2. Note the issues and actions set out in this report which are informing the development of the Council's MTFS for 2017 – 2020;
3. Note the timescales and next steps for reviewing and consulting on budget proposals;

1. REASONS FOR THE DECISIONS

- 1.1. The Council is under a duty to set a balanced and sustainable budget and maintain adequate reserves such that it can deliver its statutory responsibilities and priorities.
- 1.2. A Medium Term Financial Strategy (MTFS) covering the entirety of the resources available to the Council is considered to be the best way that resource prioritisation and allocation decisions can be considered and agreed in a way that provides a stable and considered approach to service delivery and takes into account relevant risks and uncertainty.

2. ALTERNATIVE OPTIONS

- 2.1. Whilst the Council will adopt a number of approaches to the identification of measures aimed at delivering its MTFS there is no alternative other than to set a legal and balanced budget and agree its Council Tax before the statutory deadline.
- 2.2. The Council could continue with the current approach of agreeing proposals on an annual basis but this does not support a strategic approach which allows for proposals to be managed and implemented over a longer period of time leading to evidenced based policy decisions and better overall outcomes.

3. DETAILS OF REPORT

3.1. Background

- 3.1.1. The medium term financial planning process is an essential part of the Council's resource allocation and strategic service planning framework. The Medium Term Financial Strategy (MTFS) integrates strategic and financial planning over a three year period. It translates the Strategic Plan priorities into a financial framework that enables the Mayor and officers to ensure policy initiatives can be delivered within available resources, and can be aligned to priority outcomes.
- 3.1.2. The drivers for the Council's financial strategy are:
 - To set a balanced budget over the life of the MTFS whilst protecting residents from Council Tax increases as far as possible.
 - To fund priorities agreed within the Strategic Plan, ensuring that service and financial planning delivers these priorities.
 - To deliver a programme of planned reviews and savings initiatives designed to keep reductions to service outcomes for residents to a minimum.
 - To maintain and strengthen the Council's financial position so that it has sufficient reserves and balances to address any future risks and unforeseen events without jeopardising key services and delivery of service outcomes for residents.

- Ensuring the Council maximises the impact of its spend to deliver priority outcomes.
- 3.1.3. Since 2011-12 in the face of unprecedented reductions in Government funding and increasing demand on services, the need to make savings has dominated the Council's financial planning process.
- 3.1.4. In February 2016 the Council agreed a balanced budget for 2016-17 and a Medium Term Financial Plan (MTFP) that showed a budget gap over the period 2017-2020 of £60m.
- 3.1.5. This report begins to explore the challenges facing the Council in the context of a number of fundamental changes to the financial environment in which Local Authorities operate. In particular it outlines a process that will deliver a balanced budget position over the course of the MTFS period; and gives a commitment to report a more granular analysis by the October Cabinet meeting.

3.2. Strategic Approach

- 3.2.1. The Council has a well-embedded approach to strategic and resource planning. Key priorities are agreed with residents and partners and these are reflected in a set of strategic objectives in the Council's three year Strategic Plan and these underpin the Medium Term Financial Strategy.
- 3.2.2. The Strategic Plan focuses on two priority outcomes and an enabling objective. These are:

Priority 1-Creating opportunity by supporting aspiration and tackling poverty – has the following outcomes:

- 1.1 A dynamic local economy, with high levels of growth;
- 1.2 More residents in good quality, well paid jobs;
- 1.3 Young People realising their potential;
- 1.4 More people living healthily and independently for longer;
- 1.5 Reducing inequality and embracing diversity.

Priority 2- Creating and maintaining a vibrant, successful place – has the following outcomes:

- 2.1 An improved local environment;
- 2.2 Better quality homes for all;
- 2.3 Less crime and anti-social behaviour;
- 2.4 Engaged, resilient and cohesive communities.

Enabling objective-A transformed Council, making best use of resources and with an outward looking culture - has the following outcomes:

- 3.1 Making best use of Council resources;
- 3.2 Support an organisation based on transparency, trust and effective relationships;
- 3.3 Deliver an organisational transformation programme;
- 3.4 Develop an effective workforce strategy;

- 3.5 Nurture an outward looking culture, by asserting our place and relationships in London.

3.2.3. In the past this strategic approach has not been reflected in the Government's annual announcement of financial resources and, in recent times, in year reductions to previously announced funding levels. However, at the time of the 2016-17 Provisional Local Government Funding Settlement an announcement was made offering a 'guaranteed' financial settlement for the four year period 2016-2020.

3.2.4. Whilst the guarantee is limited in its scope and requires the production of an, as yet determined, Efficiency Plan it does provide a platform for longer term financial planning and the Council is proposing to adopt such an approach by seeking to agree budget proposals spanning the whole of the remaining MTFS period (i.e. 2017 – 2020). It is also adopting an Outcome Based Budgeting approach in order to inform its proposals.

3.3. Outcome Based Budgeting

3.3.1. Outcome Based Budgeting (OBB) aims to directly link how resources are allocated through budget mapped to the strategic priorities of the Council. OBB seeks to break down traditional departmental approaches in terms of the assumptions around how budgets should be set and the basis for making savings. The Council's new Medium Term Financial Strategy (MTFS) 2017-2020 seeks to reflect OBB principles, delivering the Council's priority outcomes as set out in the Strategic Plan, while making savings through planned budget reductions rather than cutting costs on a service by service basis.

3.3.2. Proposals will be identified covering the whole of the MTFS planning period and bridging the total identified funding gap – currently £60m.

3.3.3. This approach allows for a programme of savings to be planned and undertaken over a longer timeframe which should result in proposals that will allow for the development of more detailed future operating models alongside partners and stakeholders. It also allows for the support necessary to deliver the changes successfully to be better matched and planned for; this would include for example programme management arrangements and support and training for staff that may need to operate in new ways in the future.

3.4. Future Outlook for the Council's Finances

3.4.1. Notwithstanding the fact that the Government is proposing a four year funding guarantee, this substantively applies to the relatively small and diminishing amount of Revenue Support Grant (RSG). Since 2013/14 Councils have retained an element of the business rates that they collect (30% for Tower Hamlets). The total retained business rates for 2016-17 is £121m. There are a number of developments relating to the retention of business rate that could, given the significance of business rates in the Borough, have a fundamental effect on the Council's finances.

3.4.2. In particular:

- The revaluation of Business Rates which will take effect from next April and is based on April 2015 business rate values;
- The impact of the above revaluation on the business rate multiplier (in order to maintain a neutral impact overall to valuation changes);
- The impact of the above revaluation on appeals by business ratepayers which, in the early years are often significant and which the Council is now exposed to financial risk on;
- The 'resetting' of the system of top-ups and tariffs that accompanies the Business Rate Retention Scheme and takes into account relative need which was originally proposed to happen in 2020 but could be reviewed as part of the revaluation process; and
- The development of the government's 100% business rate retention scheme which will potentially have wide ranging impacts on other funding sources as the assumption is that a number of existing funding streams will be subsumed into this new source of funding.

3.4.3. In addition to the increasing importance of Business Rates, Council Tax will continue to be an important source of revenue. After several years of Council tax freezes, enabled by a specific Council tax freeze grant, the government withdrew the freeze grant and allowed Councils to increase Council Tax in 2016-17 by up to 4%. 2% of which was to support Adult Social Care pressures and up to a further 2% was for more general purposes as a consequence of the cessation of the freeze grant.

3.4.4. A new measure of Core Spending Power (CSP) was introduced which assumed a number of actions going forward in order to introduce a consistent measure of funding changes over time; key amongst these assumptions was that Councils would take advantage of the ability to increase its Council tax for both elements. The government has therefore assumed in its funding allocations that the Council will continue to increase Council Tax each year. Even taking into account those assumed increases the Tower Hamlets CSP would fall by 3.7% over the period to 2020.

3.4.5. In the October Cabinet report, Members will be presented with updated information relating to its locally generated sources of funding and any impact that changes, subsequent to the February report, have on the MTFS.

3.4.6. The Council is also awaiting details of possible changes to the operation of the New Homes Bonus (NHB) which was the subject of a consultation by the Department for Communities and Local Government (DCLG) from December 2015 to March 2016. This issue together with a revised assessment of the impact upon other funding sources such as grants – Education Support Grant, Public Health Grant etc. totalling £62million will also be brought back to inform the latest funding position for the Council.

3.5. Strategic Support

3.5.1. In order to support the Council's strategic long term approach the Council has begun a procurement exercise to identify a partner who will work alongside Council staff to provide additional support and capacity given that there are likely to be a number of transformational activities happening concurrently. The partner will also assist the Council in accessing specialist resources where other organisations have already undertaken and implemented similar proposals.

3.5.2. The Invitation to Tender identifies that work has already been undertaken in this area to date with Grant Thornton and CIPFA and identifies a number of potential constraints:

- The capacity of the organisation to work concurrently on a number of complex proposals;
- The intention to develop proposals that draw on evidence based data and best practice.
- The need to develop coherently a large number of proposals against a timescale that requires the approval of the Council's budget in February 2017.

3.5.3. The strategic partner could be an individual, a company or a consortium with previous experience in supporting the identification and establishment of proposals for both investment and savings in the context of service transformation linked clearly to Priority Outcomes. The key areas of support are identified as:

- Support the Outcome Based Budgeting methodology;
- Support the MTFs & devise a Transformation Strategy
- Support Member participation in Outcome Based Budgeting
- Leadership, People & Culture

3.6. Next Steps

3.6.1. A further report will be brought to the October Cabinet which will provide a detailed update of the financial planning assumptions underpinning the current MTFs. The outcome of this will be a confirmation of the estimated savings gap over the period to 2020.

3.6.2. The report will also bring forward a number of draft savings and investment proposals, covering in full the medium term planning period to 2020 alongside a strategy that fully meets the identified funding gap and with the intention of initiating formal consultation.

3.7. Budget Consultation and Scrutiny

3.7.1. The draft timetable for the budget setting process is as follows:

Activity	
Emerging budget proposals developed which are informed by the four year financial settlement, a review of funding assumptions and planned savings targets	July – September 2016
Draft budget, including consultation proposals for savings and investment.	4 th October 2016 Cabinet
Proposed Budget agreed by Cabinet for approval at Council	7 th February 2017 Cabinet
Agree Final budget and setting of the Council Tax	2 nd March 2017 Full Council

Budget Scrutiny Process 2017/20

- 3.7.2. The Overview and Scrutiny Committee (OSC) is developing its capacity to meet the challenge of providing effective budget scrutiny, especially as a three year budget will be in place by March 2017. The following sets out the role of overview and scrutiny in the budget preparation process. Some of these reflect the formal constitutional arrangements and others propose additional activity to strengthen the role of OSC in the development of the rolling three year budget.
- 3.7.3. In addition to the scrutiny of relevant revenue savings and investment proposals the Committee will undertake similar scrutiny of capital programme proposals. They will also have an overview of the Medium Term Financial proposals being considered for approval by the Board of Tower Hamlets Homes (THH), including proposals for rent setting, and also the budget strategy for the Dedicated Schools Budget (DSB) which will be proposed for approval by the Cabinet, from the Schools Forum.

Activity	Date	Outcome
The Cabinet Member and Officers to outline the rationale for the new rolling three year outcome based budget approach. This presentation will include; the aims of the budget, how this differs from the traditional Tower Hamlets way of budget making, relevant timelines and the role of scrutiny in making it a success.	Overview and Scrutiny Committee meeting – 1 st September 2016	Develop understanding of new budget setting process and how OSC can effectively contribute to this.
Budget scrutiny training for OSC Members	At present the evenings of 29 th September and the 3 rd , 5 th and 6 th of October are available	Explain the role of OSC Members in budget scrutiny and highlight good practice that demonstrates how this can be effectively carried out.
Pre-decision scrutiny of draft budget proposals	Overview and Scrutiny Committee 28 th September.	Review draft budget proposals and identify areas of priority which OSC would like to further consider in detail.
Budget Scrutiny Working Group	Mid Nov – Mid Dec 2016 – Dates TBC	<p>Arrange up to 2 additional OSC sessions for November or early December to give OSC Members opportunity to consider specific proposals in depth and help better understand the impact on service users.</p> <p>The outcomes from these sessions will be reported to Cabinet on 6th December or 10th Jan 2017.</p>
Budget and Policy Framework – Budget Scrutiny meeting	<p>23rd January 2017</p> <p>13th February 2017 (if there are any changes to budget following Cabinet on 7th Feb)</p>	Review final Cabinet budget proposals and provide comments for consideration by Cabinet and Full Council.

4. COMMENTS OF THE CHIEF FINANCE OFFICER

4.1. All financial issues have been fully considered within this report and there are no additional points to make.

5. LEGAL COMMENTS

5.1. The report proposes consideration of a revised medium term financial plan. This is a matter that informs the budget process and may be viewed as a related function. It is, in any event, consistent with sound financial management and the Council's obligation under section 151 of the Local Government Act 1972 for the Council to adopt and monitor a medium term financial plan.

5.2. The report provides information about risks associated with the medium term financial plan and the budget. This is, again, consistent with the Council's obligation under section 151 of the Local Government Act 1972 to make proper arrangements for the management of its financial affairs. It is also consistent with the Council's obligation under the Accounts and Audit Regulations 2015 to have a sound system of internal control which facilitates the effective exercise of the Council's functions and which includes arrangements for the management of risk. The maintenance and consideration of information about risk, such as is provided in the report, is part of the way in which the Council fulfils this duty.

5.3. The Council is a best value authority within the meaning of section 1 of the Local Government Act 1999. As such the Council is required under section 3 of the Local Government Act 1999 to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness (the best value duty). The setting of a medium term financial plan is one of the ways in which the Council can achieve best value.

5.4. The Council is required to consult for the purposes of deciding how to fulfil its best value duty. It must consult with representatives of council tax payer, business rates payers, persons likely to use services and persons appearing to have an interest in any area within which the Council carries out functions. As the adoption of a medium term financial plan is one of the Council's existing arrangements, it is arguable that consultation is not required prior to its amendment. However, best value consultation will likely be required at the time of preparing the 2017/2018 budget.

5.5. When considering the medium term financial plan, any savings proposals and the strategic plan, the Council must have due regard to the need to eliminate unlawful conduct under the Equality Act 2010, the need to advance equality of opportunity and the need to foster good relations between persons who share a protected characteristic and those who don't (the public sector equality duty). A proportionate leave of equality analysis is required to inform the consideration required by the public sector equality duty. The report provides the borough equality analysis and sets out how equality impacts are addressed in relation to savings proposals. To the extent that savings proposals involve service changes which impact on individuals, consultation may be required to understand the impacts on those people.

5.6. Any consultation carried out for the purposes of either the best value duty or the public sector equality duty will need to comply with the following requirements: (1) it should be at a time when proposals are still at a formative stage; (2) the Council must give sufficient reasons for any proposal to permit intelligent consideration and response; (3) adequate time must be given for consideration and response; and (4) the product of consultation must be conscientiously taken into account. The duty to act fairly applies and this may require a greater deal of specificity when consulting people who are economically disadvantaged. It may require inviting and considering views about possible alternatives.

6. ONE TOWER HAMLETS CONSIDERATIONS

6.1. The development of a rolling three year Medium Term Financial Strategy will support the more effective delivery of One Tower Hamlets priorities.

7. BEST VALUE (BV) IMPLICATIONS

7.1. The Council is required to consider the value for money implications of its decisions and to secure best value in the provision of all its services. It is important that, in considering the budget, Members satisfy themselves that resources are allocated in accordance with priorities and that full value is achieved.

8. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

8.1. The sustainable action for a greener environment implications of individual proposals in the budget will be set out in the papers relating to those proposals.

9. RISK MANAGEMENT IMPLICATIONS

9.1. Managing financial risk is of critical importance to the Council and maintaining financial health is essential for sustaining and improving service performance. Setting a balanced and realistic budget is a key element in this

process. Specific budget risks will be reported to Cabinet as the budget process develops.

10. CRIME AND DISORDER REDUCTION IMPLICATIONS

10.1. The crime and disorder implications of individual proposals in the budget will be set out in the papers relating to those proposals.

11. SAFEGUARDING IMPLICATIONS

11.1. The safeguarding implications of individual proposals in the budget will be set out in the papers relating to those proposals.

Linked Reports, Appendices and Background Documents

Linked Report

- None.

Appendices

- None.

Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012

- None.

Officer contact details for documents:

N/A

<p>Cabinet 6th September 2016</p>	 TOWER HAMLETS
<p>Report of: Kevin Kewin, Interim Service Head, Corporate Strategy and Equality</p>	<p>Classification: Unrestricted</p>
<p>Best Value Plan Update</p>	

Lead Member	Mayor John Biggs
Originating Officer(s)	Kevin Kewin
Wards affected	All wards
Community Plan Theme	All
Key Decision?	Yes

Executive Summary

This report provides an update on the council’s Best Value Action Plans which respond to the Secretary of State’s Directions. It is the Council’s third 6 monthly update, which will be submitted to the Secretary of State later in September.

Recommendations:

The Mayor in Cabinet is recommended to:

1. Agree the 6 monthly update prior to submission to the Secretary of State.

1. REASONS FOR THE DECISIONS

- 1.1 The Council is required to monitor these plans to comply with Secretary of State Directions.

2. ALTERNATIVE OPTIONS

- 2.1 The Council is required to comply with Secretary of State Directions.
- 2.2 The actions within the plans have been the subject of consultation with a range of parties, and the Commissioners, which has considered alternative options.

3. BACKGROUND

- 3.1 This is the latest in a series of update reports on the Council's progress in meeting the actions and milestones set out in the Best Value Action Plans. The last update of this kind was provided in March 2016. Since then activity has intensified to deliver the outstanding actions. In particular, this update addresses key issues identified by the Commissioners and the Secretary of State in their letters to the Mayor in March 2016. The format of the report has also changed, with a greater focus on outcomes rather than milestones delivered; the content of each theme has been redrafted to reflect this.
- 3.2 In recent months, there has also been a strong focus on Organisational Culture. The Council is a more outward looking organisation, actively involved in sub-regional discussions, and the authority has already made significant progress in relation to transparency. The Council's transformation planning is further developed, supported by a new Workforce Strategy. The Council's approach to whistleblowing has been improved. Significantly, the Council now has developed an Organisational Culture Plan which sets out our future aims, actions and how the Council will track progress.
- 3.3 There has been strong progress in other areas. In recent weeks, the Commissioners have indicated that they are now satisfied to recommend that the relevant Directions should be lifted in respect of Procurement. In terms of Communications, the Council is now fully compliant with Code of Recommended Practice on Local Authority Publicity and the first issue of the new quarterly publication 'Our East End' was published in June.
- 3.4 In relation to grants, transitional arrangements towards Executive decision making are progressing. This includes a proposal for the Mayor (or his delegate) to chair the Decision Making Meetings in public to consider officer recommendations on grants. There is also progress on the remaining areas of the Property work-stream.

4. COMMENTS OF THE CHIEF FINANCE OFFICER

- 4.1 The Best Value Action Plan is a priority for the Council, and requisite resources have been identified within the budget in order to deliver the outcomes.

5. LEGAL COMMENTS

- 5.1 The Council is a best value authority within the meaning of Part 1 of the Local Government Act 1999. As a best value authority, the Council has an obligation under section 3 of the Local Government Act 1999 to "make

arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness” (the best value duty).

- 5.2 Where the Secretary of State is satisfied that an authority is not meeting its best value duty, the Secretary of State may: (1) direct the authority to take action to bring itself into compliance with that duty; (2) direct that specified functions be carried out by the Secretary of State or a nominee and that the authority follow the Secretary of State’s instructions and provide such assistance as may be required (Local Government Act 1999). In accordance with this power the Secretary of State gave directions to the Council on 17 December 2014, 29 April 2015 and 6 May 2015.
- 5.3 The directions are enforceable by the Secretary of State, who may seek an order in the High Court requiring the Council to remedy any breach. In the circumstances, it is appropriate for the Council to take steps to comply with the directions and to monitor its compliance with the directions. The report relevantly informs members of progress and appropriately indicates that Cabinet approval will be sought before presenting the required update to the Department of Communities and Local Government.
- 5.4 When taking action in response to the directions, the Council must have due regard to the need to eliminate unlawful conduct under the Equality Act 2010, the need to advance equality of opportunity and the need to foster good relations between persons who share a protected characteristic and those who do not (the public sector equality duty). Compliance with this duty has been a feature, to the extent relevant, of the Council’s action in response to the directions.
- 5.5 There are no immediate legal implications arising from this report.

6. ONE TOWER HAMLETS CONSIDERATIONS

- 6.1 The Council needs to deliver its functions, including in relation to those elements transferred to the Commissioners through Directions, with due regard to equality and the need of groups with protected characteristics. For example, changes to the way in which the Council awards grants and publicises its activity has the potential to impact on equality and cohesion in the borough. Any significant policy changes emerging from the improvement planning activity will be subject to an equality impact assessment.

7. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

7.1 No specific environmental implications.

8. RISK MANAGEMENT IMPLICATIONS

8.1. Delivering the actions within the Plans will mitigate risks to the Council in delivering best value.

9. CRIME AND DISORDER REDUCTION IMPLICATIONS

9.1 No specific crime and disorder implications.

10. EFFICIENCY STATEMENT

10.1 Through ensuring the Council meets its best value duty, the plans will improve efficiency and effectiveness of the key functions covered within them.

Linked Reports, Appendices and Background Documents

Linked Report

- NONE.

Appendices

- Best Value Action Plan –third six monthly update report (June 2016)

**Background Documents – Local Authorities (Executive Arrangements)
(Access to Information) (England) Regulations 2012**

- None

Officer contact details for documents:

- Kevin Kewin, Interim Service Head, Corporate Strategy and Equality

Best Value Action Plan

Third 6 monthly update report

The Council is pleased to provide a progress update against the Council's Best Value Action Plans. In particular, there has been considerable progress since the last submission in March 2016.

The Council is now in a position to report that more than 95% of the actions within the Best Value Plans are complete. More significantly, progress has been made in delivering the related outcomes and further information on this is provided below.

It is also recognised that implementing significant organisational change is a long-term, iterative process. As such, this update report also addresses issues, which fall outside of the formal Best Value Plans agreed with the Secretary of State, that have been identified by the Council or the Commissioners as matters where further work is required and underway.

Procurement

All actions in the Procurement Best Value Action Plan have now been successfully delivered and the Commissioners have indicated that they are satisfied to recommend to the Secretary of State that the Directions, in respect of Procurement, are lifted. In recent months, the Council has implemented a new procurement operating model and there is strong evidence of success, including in the significant **reduction of the number of cards in use, the level of expenditure and off-contract spend**. Activity relating to broader work on declarations of interest, now sits within the Organisational Culture Best Value Action Plan.

Grants

All actions in the Grants Best Value Action Plan have been delivered and significant progress has been made in relation to all aspects of grant management, including transitional arrangements towards Executive decision making. This includes a proposal for the Mayor (or his nominee) to chair the Decision Making Meetings in public to consider officer recommendations on grants. Discussions are ongoing with the Commissioners on being in a position for the Direction to now be lifted.

Communications

The Council has been fully compliant with the Code of Recommended Practice on Local Authority Publicity since May 2016 and the first issue of the new quarterly publication 'Our East End' was published in June. A new Head of Communications has been in post since 25th July. The key outstanding action in relation to Communications is to complete the fully-costed business plan required by the Directions; this will be finalised by September.

Property

Further progress has been made in this area over recent months. Following the adoption of a new asset strategy, the Council has implemented a carefully managed disposal programme and a series of rent reviews. The remaining actions within the Best Value Plan are on track for completion. A key area of focus over the next period is planning work to support the Council's approach to Community Buildings **with a report going to Cabinet in October**; the implementation plan will be finalised in the autumn, in time for the charging regime to start in April 2017. In addition, work is progressing on whether an Asset Rental Account model would be beneficial for the Council.

Organisational Culture

In the Mayor's State of the Borough Statement to full Council in May 2016, he clearly defined the failings of the previous culture and reinforced the need to rebuild strength and confidence in the Council's

management, members and workforce. These views echoed those made by the Commissioners, including that '*a very different culture and approach is required to embed the changes necessary*'.

The Council's organisational culture is improving, and there has been a considerable step-change in recent months. We are a more outward looking Council, actively involved in national and sub-regional discussions, and the authority has already made significant progress in relation to transparency. Significantly, a new Organisational Culture Plan has been developed and discussed with the Commissioners that draws together all aspects of the work already underway and required. It provides a robust framework to support current and future activity in this area, clearly setting out the Council's future aims and how it will embed and track progress. Feedback from the Commissioners is being incorporated into an updated draft of the Plan, including the timescales for delivery. There has also been further development of the Council's Transformation Plan focusing on outcomes, including a new Workforce Strategy and with significant emphasis on areas such as leadership, staff engagement and core values.

The Council's approach to Whistleblowing has been reviewed and improved with a revised procedure accessible on the Council's intranet and website for use by staff and the public. Further work is underway. **A Whistleblowing Charter is the next step and an independent Programme Manager will be procured to establish the charter, deliver training and foster greater trust across the organisation. In addition, the Programme Manager will lead a new time-limited clear up team which is being established to conduct a review of any unconsidered allegations of improper Council decision making or impropriety in the discharge of Council functions arising between October 2010 and June 2016. The Programme Manager will be responsible for driving this work forward and the work of the clear up team will be overseen by the Clear Up Board comprising the three statutory officers and a co-opted Commissioner.**

The Commissioners have identified delegation of powers to the Chief Executive as an area requiring further progress. The Constitution has been reviewed by the Monitoring Officer and within that review, changes have been identified to set out the respective functions of the Chief Executive and Mayor and how they should work together in greater detail so that this will be broadly comparable with other Councils with Executive Mayors. **Following further constructive discussions between the Commissioners, the Mayor, Chief Executive and Monitoring Officer regarding the Chief Executive taking extremely urgent decisions, as well as decisions where the Mayor is unable to act for whatever reason, further revisions to the constitution are being made. In addition to the existing checks and balances in the Constitution regarding implementation of decisions, it is also intended that the Chief Executive will have the power to make a written report to the Mayor, which the Mayor must consider, regarding the implementation of any individual decision. Changes to the Constitution will be referred to General Purposes Committee for consideration in September and then recommended to full Council.**

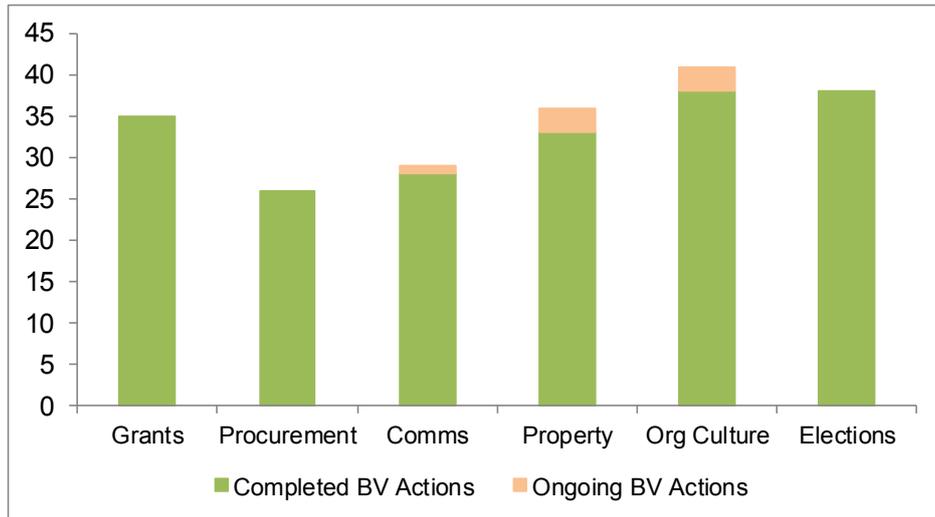
Elections

All actions in the Elections Best Value Action Plan have been successfully completed. The GLA and London Mayoral Elections were successfully delivered in May 2016, as was the EU Referendum on 23rd June. The Commissioners noted in a letter to the **Executive Mayor (22nd March 2016)** that the Council had devoted significant additional expenditure to delivering recent elections which is far above the level of similar local authorities. They noted the key challenge for Electoral Services in Tower Hamlets going forward is to continue to deliver a '*fair and safe electoral event within more normal allocation of resources*'. The Council is committed to striking the right balance between reducing spend and maintaining fair and safe elections.

Overall progress against Best Value Action Plans

Grants	Procurement	Comms	Property	Org Culture	Elections
100%	100%	97%	92%	93%	100%

The charts below shows progress against the total number of milestones identified within the Best Value Plans first agreed with the Secretary of State in March 2016. It demonstrates a high level of progress – further detail of key achievements and corresponding outcomes are provided in the following sections.



Best Value Area	Procurement	Overall Delivery Status GREEN - COMPLETED
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Progress Summary

Background

The Council's arrangements for procurement lacked consistency and rigour in a number of areas which led to weaknesses in internal control and concerns regarding appropriate member engagement in the procurement process. The key areas of concern included lack of documentation that provided an audit trail, delays in the award of contracts; this led to the high use of waivers and a lack of monitoring of and compliance with procurement procedures. Maintenance of departmental contract registers was also considered insufficient and collectively these deficiencies undermined the integrity of the Council's procurement arrangements.

The Best Value Procurement action plan aimed to deliver a range of immediate improvements as well as the broader transformation of the council's procurement practices. The action plan was developed with consideration of the wider reform of public sector procurement recently implemented through the new Public Procurement Regulations 2015, Local Government Transparency Code and the launch of the National Procurement Strategy 2015.

The PwC inspection that led to the Procurement Directions devotes a whole section (chapter 7) to the "Processes and practices for entering into contracts". It concluded that contracting "takes place within a highly structured and regulated environment, governed as applicable inter alia by EU procurement rules, the Authority's Constitution and its documented procurement procedures". Whilst the inspection concluded the overall written procurement policies and procedures were sound, the main criticisms were as follows:

- A prevalent lack of audit trail in procurement documentation
- Lack of evidence of tollgate reviews in a significant minority of procurements
- High numbers of waivers, approved through Corporate Directors' Actions
- A requirement for contracts to be awarded in consultation with the Mayor, resulting in unnecessary delays in the award of contracts
- Lack of maintenance of complete contracts' registers by directorates; and
- Lack of monitoring by the central procurement function of the adherence of directorates to procurement procedures in their areas.

The Procurement Action Plan was structured around five key themes with an aim to transform the way the council undertakes procurement activities and engages with its suppliers. The five key themes were Strategy and Vision; Organisational Development; Governance, Systems and Procedures; Category Management and Commercial, Contracts and Risk Management.

In January 2014, following an end-to-end review of our procurement process and procedures, a refreshed set of procurement procedures were launched to incorporate the recommendations from a competitive tendering audit, strengthen the governance process, embed the Procurement Policy Imperatives and re-channel all devolved procurement activity over £25,000 through the Corporate Procurement Service. Considerable work followed to transform the council's procurement activity in line with the activities and milestones set out in the Best Value Action Plan.

Key achievements

- Detailed analysis of all third party expenditure for the financial year 2014-15 completed to identify key categories of third party spend and establish a clear category management strategy to ensure value for money (VFM) for these categories of spend, reduce costs and oversupply.
- New Directorate Procurement Dashboards developed to identify opportunities for collaboration and savings from the council's third party expenditure.

- New central contracts register linked to contract award implemented to capture all contracts above £25,000 including all procurement waivers.
- New Supply Chain Ethical Code of Conduct developed and approved to strengthen adherence to ethical standards by suppliers delivering public services on behalf of the council.
- New procurement training programme developed to improve procurement knowledge and skills across the organisation. Training completed by 250 officers at end of March 2016 and provided on an on-going basis.
- New Central Procurement Service introduced to further strengthen the role of corporate procurement and to deliver improved value for money from the council's third party expenditure.
- Improved Finance and Procurement controls introduced and implemented to increase compliance with, and transparency of, spend across the organisation.
- New supplier risk management initiative introduced (pre and post appointment).
- Procurement Procedures refreshed to reflect changes introduced through the Public Contracts Regulations 2015 and further strengthen internal compliance.
- New Procurement Strategy with commitments to develop a broader Commissioning and Procurement Strategy by the end of the current financial year.
- New e-sourcing system being rolled out which will require all procurement opportunities to be tendered through a single e-tendering system that is integrated with the Councils financial systems.

Successful implementation of the action plan has resulted in ensuring **92%** of our procurement spend is under contract (FY15/16), **98%** of all applicable contracts include London Living Wage and **49%** of our contracts include employment and community benefits for our residents.

Areas where work continues to progress

We recognise there is more work to be done in some specific areas to fully embed the transformation of this service. There is a particular focus on the following areas:

Purchase Cards

The current Purchase Card system was introduced by the Council in 2008 as a convenient and cost effective method of purchasing low value goods and services. There are a number of benefits in using Purchase Cards such as reducing procurement processing times and supporting the Government's prompt payment initiative for Small and Medium Enterprises. An internal audit review of purchase cards identified some cards to have been misused in some parts of the Council. We have responded to this by significantly strengthening controls around the issue of new cards, comprehensively reviewing the use of existing cards, restricting the category of spend under which cards can be used and enhancing monitoring and reporting arrangements to validate all expenditure to ensure it is legitimate and in accordance with financial regulations. **The number of cards and their use are now reviewed on an annual basis, with an annual internal audit of purchase cards.**

Through our Category Management activities considerable work has been undertaken to control the use of purchasing card expenditure and re-direct spend through appropriate contracts. The improved controls, implemented as part of the Best Value Action Plan, have helped to reduce spend through purchase cards considerably from almost £7 million in 2008/09 to just over £1 million in 2015/16. Total Council spend through purchase cards is now just **0.33%** of the overall £312m annual procurement spend and is mainly used for purchasing approved items such as training, travel, and leisure activities. Monthly monitoring of expenditure is now fully embedded and as part of the implementation of our new e-sourcing system, targets have been set to further reduce the overall spend as well the number of cards in circulation. Our target for 16/17 and the actual information for the two previous years is set out in the table below.

	13/14	14/15	15/16	16/17 (Target)
Spend (£)	1,589,803	1,409,079	1,034,117	800,000
Card Holders	269	254	198	150

Procurement Waivers and Member Engagement

Under the Council's Financial Regulations, Corporate Directors had delegated authority to approve procurement waivers up to the limit of £250,000. Following the launch of the revised procurement procedures in January 2014, and subsequent Best Value Procurement Action Plan, we have strengthened our internal procedures and controls including the conditions under which a waiver is granted. We have also reduced the threshold for procurement waiver to align with the EU procurement threshold for Supplies and Services (£164,176).

Clear written procedures and guidance are in place for the administration and control of the Corporate Directors' delegated powers. Where a waiver is required, the originating officer must fully justify how the proposed procurement process will represent overall best value and how it complies with the Council's procurement rules as well as the Public Contracts Regulations 2015. All procurement waivers require approval from the relevant Service Head, Directorate Finance Manager, Head of Procurement, Head of Legal Services and the originating Corporate Director. The number of procurement waivers has been substantially reduced by **70%** from **218** in 13/14 to **65** at the end of March 2016.

The number of waivers finally approved during 2015/16 was slightly higher than the original target of 60. The analysis of those approved identified 35 that were required to enable an extension to existing contracts due to be re-commissioned. The extensions were primarily required due to delayed or deferred executive decision making in previous years, without the required evidence or justification for the delay or deferral. This left insufficient time to undertake the full and proper procurement process before the contract expiry date. The backlog of contracts needing to be re-procured has reduced significantly and the Council now produces a comprehensive rolling Contracts Forward Plan that is presented to Cabinet on a quarterly basis, detailing all key contracts due to expire in the following two to three years. This ensures effective forward planning of the Council's commissioning and procurement activity.

The previous restriction on three year contract terms has been relaxed and where appropriate contracts have been approved by Cabinet to be procured for longer periods. Further, the requirement for the contract to be awarded 'in consultation with the Mayor' has also been removed resulting in a more effective reporting process. A new e-sourcing system has been rolled out which requires the evaluation of all tenders to be completed on-line with a full audit trail of all procurement activity within a central system. The introduction of the online tender evaluation will address the issues raised in the PWC report.

We have reviewed the waivers that were approved during 2015/16 and based on that analysis we have set new targets to further reduce the number of procurement waivers for 2016/17 as set out in the table below. This takes account of the planned procurements and acknowledges that a smaller number of contract extensions will be required during 2016/17.

	13/14	14/15	15/16	16/17 (Target)
Waivers	218	114	65	45

Declarations of Interest

Historically, the council had arrangements for officers to declare conflicts of interest by exception, resulting in officers only making declarations where conflicts of interest were envisaged. This did not provide sufficient assurance that the failure to comply or the failure to disclose would be routinely identified and followed up.

The new arrangements are mandatory and require officers to complete declarations of interest at least annually, including nil returns. Specifically, within procurement, mandatory arrangements have been put in place for declarations of interest to be formally signed off at key stages of the procurement cycle and to be formally recorded.

The requirement for declarations of interest has been incorporated at different stages of the entire procurement process for both employees and suppliers. Employee declarations of interest are recorded through the Council's HR system and updated annually. Organisations bidding for Council contract

opportunities are required to declare interests at the Pre-Qualification Stage (PQQ) as well as at the Invitation to Tender (ITT) stage. There is a requirement for officers, as well contractors acting on behalf of the Council, in a procurement exercise to record interests at various stages of the procurement process including;

- **Initiation stage:** the procurement initiation form requires officers to confirm completion of declaration of interest on the HR system and to provide evidence, for a procurement declaration of interest to be completed.
- **Evaluation stage:** all members of the panel are required to sign the evaluation matrix and confirm that they do not have any conflict of interest that would prevent their full and unprejudiced participation in the procurement process.

The requirement to implement appropriate declarations of interest has been fully implemented. The new process has been communicated through various mediums including the Council’s intranet, staff magazine and as part of the procurement process to officers and suppliers. The mandatory arrangements put in place ensure compliance through enhanced management oversight and regular auditing of the declarations.

Outstanding BV Procurement Actions	Completed BV Procurement Actions
0	26

Best Value Area	Grants	Overall Delivery Status: COMPLETED
Progress Summary		
<p>Background</p> <p>All outstanding actions in the grants Best Value Action Plan have now been completed, with a series of operational improvements made to further enhance the Council's grants' functions. Considerable work has been undertaken over the last 18 months to review and develop new approaches to, and processes for, grant making with the Commissioners. The proposals that have been developed and implemented included input from the Mayor and Deputy Mayor for Third Sector and take account of the involvement of Overview and Scrutiny Committee as a cross party forum and members more generally, as well as from the voluntary and community sector.</p> <p>Key Achievements</p> <ul style="list-style-type: none"> • The Council's Cabinet has agreed a new Voluntary and Community Sector Strategy, setting out a new strategic approach to the sector, including a move from grants to a commissioning based approach to secure outcomes that are fully aligned to the Council's strategic priorities. The Strategy was developed with input from, and in consultation with, local voluntary sector organisations. • While progress was slow to agree a mechanism for cross party oversight of grant allocations, the Grants Sub-Committee of the Overview and Scrutiny Committee was established in April 2016 and is now fully operational, having met three times. The Committee ensures that cross party Members have an input into timely, transparent decision making in relation to grants, including the development of grant scheme objectives and criteria and a review of performance. • A work programme has been developed which aligns to the grants decision making process to ensure cross party feedback can feed into the decision making process. Members of the Committee have been given comprehensive governance related training including enhanced disclosure of interests. • Proposals for Executive decision making on grants, following the departure of the Commissioners, have been agreed. • The Mayor and Deputy Mayor have been co-opted onto the Commissioners Decision Making Meeting for grants which takes place in public. • A report setting out the transitional arrangements for the Mayor to chair the Grants Decision Making Meeting was considered and approved in July and implemented from September. • The Mainstream Grants Programme has completed its first three delivery periods (September 2015 - June 2016) and officers have assessed against agreed output and outcome targets. A detailed performance report has been produced as part of the regular performance monitoring and reporting cycle that has been established for the MSG programme. Improvements to the performance monitoring arrangements and the performance report continue to be made, including feedback from the voluntary and community sector and Overview and Scrutiny to ensure that the monitoring and reporting is risk based, proportionate and adds value. • A procurement process to secure a provider to independently review mainstream grant giving between 2012/15, has been undertaken and eight bids were evaluated. A successful supplier has been appointed and started work in June 2016. • The council continues to implement a more strategic and coordinated approach to grant management and work to ensure that the council's grant arrangements are co-ordinated and aligned is on-going with all service areas through the review of all grants across the Council. The review is identifying which grant schemes will remain and which will be developed as a commissioned service and the timeframe within the changes will be made. • The Cohesion Theme of Mainstream Grants is the first to become a commissioned service from April 2017. The scope and approach is being co-produced with the voluntary and community sector in line with the commitment made in the Council's VCS Strategy. • The Overview and Scrutiny Committee will review the Sub-Committee on grants in September 2016 to consider any changes or enhancements based on the first three meetings. • To further strengthen and develop the Council's grants function an independent external review of 		

the end to end processes relating to grant making, monitoring and reporting has been commissioned. The review will consider the team structure, roles and responsibilities, skills and knowledge requirements, as well as the policies, procedures and processes. The review will also cover the grants system GIFTs with a view to implementing the latest web-based version which will significantly enhance monitoring and reporting capabilities and further improve the accessibility and transparency of grants information.

- Work on improving transparency in relation to grants has been successful to date and is continuing. Grant decision making taking place in public demonstrates openness and has been well received throughout the local voluntary and community sector. The new public Grants Information Portal continues to provide community access to a comprehensive range of data including organisation and project level information, which will be further enhanced by the web-based GIFTs system.

Outstanding BV Grants Actions	Completed BV Grants Actions
0	35

Best Value Area	Communications	Overall Delivery Status: GREEN
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Progress Summary

Background

Communications in Tower Hamlets had a history of being reactive with a heavy reliance on the council's weekly publication, East End Life. Many of the messages and activities being communicated were determined by services' willingness and ability to pay and there was little use of insight or data to identify appropriate communication channels and support the delivery of effective communications campaigns. Since the Best Value Action Plan was introduced there has been significant progress in reforming the way the Council deals with internal and external publicity management.

Key achievements

- A new Communications Strategy and a model for communications work for 2016/7 which ensures that communications activity is clearly linked to the Strategic Plan and residents' priorities as set out in the Annual Residents' Survey has been developed. In addition, the council used feedback from an LGA review of its communications activity to develop its own digital communications and a more pluralistic approach to communicating with residents;
- A new Content Management System was procured to improve access to, and user experience of the council's website, and enable us to improve our SOCITM rating. The new system went live as scheduled in December 2015;
- A new e-newsletter was launched on 24 March 2016, and is being distributed regularly to just under 10,000 residents with plans to further drive up the circulation list;
- The council has been compliant with the Code of Recommended Practice on Local Authority publicity since 18 May 2016, with the final edition of East End Life published on 16 May 2016;
- A new quarterly publication, Our East End, was developed and launched on 13 June 2016 with an increased distribution of 120,000 to reflect the growth in population since the initial production of East End Life;
- The Communications Protocol has been updated, agreed by the Corporate Management Team (CMT) and promoted widely via internal communications channels;
- Training on the Communications Protocol has been delivered to relevant Mayor's Office staff (including new members of staff);
- The service has rolled out of the Print and Design framework. The majority of the council's marketing collateral now goes through Communications Service enabling us to achieve significant savings for the council as a whole;
- A Digital Communications Strategy has been developed and agreed by CMT to support the emerging Digital Strategy;
- We have a continued focus on engagement via social media, which has seen a significant increase in the numbers of residents engaging with the council through Twitter, Facebook and Instagram;
- We are focusing on the ongoing delivery of communications campaigns for directorates aligned with council and Mayoral priorities, and residents' priorities as reflected in the Annual Residents' Survey;
- A new Head of Communications has been appointed and has been in post from since 25 July 2016.

Measurable outcomes for existing work

A set of outcomes have been designed to measure the effectiveness of the work the service carries out. They include:

- E-newsletters are regularly sent out (latest figures are to just under 10,000 subscribers). The (government) industry standard is for an open rate of 22.38 per cent, click rate of 2.7 per cent. Our average open rate is 40 per cent with a click rate of 7.7 per cent. E-newsletter #7 had an open rate of 46.9 per cent and a click rate of 16.9 per cent. These rates are monitored for each

e-newsletter. 89 per cent positive/neutral coverage of the council in the media as assessed in our quarterly performance monitoring reports;

- 100 per cent of relevant Mayor's Office staff received training on Communications Protocol;
- Audit of compliance with Communications Protocol to provide substantial assurance - substantial assurance awarded;
- Target of 10,000 Twitter followers by end of 2015 met, currently we have over 11,500 followers.

Areas where work continues to progress

Work is ongoing to implement the new Communications Strategy – the current focus is to ensure the Communications Strategy is agreed by CMT and the Mayor and includes clear timelines, outputs and outcomes. The proposed campaigns that are set out in the Strategy were presented to the Mayor, Cabinet and CMT at a joint workshop in May and the Communications Service.

A restructure of the Communications Service started in August to implement a new, effective structure in line with the Council's organisational change procedures. This will ensure the service is best placed to deliver the Communications Strategy, reflect the priorities of the council and drive important and cost effective initiatives, such as the use of our e-newsletter.

Outstanding Best Value Actions

There is only one outstanding action in relation to the Communications Best Value Action Plan which is the development of a fully-costed business plan. This work is well-underway informed by the Communication Strategy and organisational restructure, and will be finalised in September.

Outstanding BV Communications Actions	Completed BV Communications Actions
1	29

Best Value Area	Property	Overall Delivery Status: GREEN
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Progress Summary

Background

The council owns, occupies or maintains around 860 non-HRA properties, valued at £1bn, located within the borough. The council also owns around £800m of HRA properties (the housing element is managed and maintained by Tower Hamlets Homes, the council's arms-length management organisation) as well as a further £50m of community assets. Considerable progress has been made to deliver the Property Best Value Plan – the majority of actions are complete.

Key achievements

The disposals and lettings protocol was adopted by Cabinet in April 2015 and the s151 officer also refreshed the financial instructions relating to the disposal of assets. These are now aligned. This protocol and the associated financial instructions are now an integral part of the team's processes when letting or disposing of property. The application of the protocol and the instructions will be tested through the council's rolling programme of audits. **The audit of the first disposal since the adoption of the process is nearing completion and the report will be available in the next few weeks.**

The Mayor, in Cabinet, has approved the principles behind the Community Buildings: Allocation and Charging policy as well as the Asset Strategy: Scoping, Principles & Priorities paper. Both have been the subject of extensive discussion with the Commissioners and with Members.

The adoption of the Asset Strategy has set out a framework for how the Council will determine its ongoing and future property needs, and move to a more fit for purpose, effective and efficient estate for the future. A high level operational property review is in the process of being commissioned. This will take a broad look at the council's estate to identify those parts of it that represent the poorest performers, in terms of cost to the council. Those sites would then be scrutinised further and services asked to justify their continued retention. The aim is to develop a transparent approach to demonstrating the cost of poor premises, and to focus challenge to the areas of greatest potential early gain.

Service areas across the council are also being asked to submit their service delivery plans in order to allow a review of their property needs to be undertaken. These reviews are being managed by the Asset Management Board, which has representatives from all council directorates on it.

The Community Buildings: Allocation and Charging policy has also set out a framework for the future management of the council's portfolio of community buildings. This includes reaffirming a number of principles, including rental for exclusive possession leases being set at the open market value (for community use), signed agreements needing to be in place, and ensuring a clear demarcation of responsibilities is agreed between the council and the tenant/user. A further piece of work is being done by the Council to identify how the council might assess, quantify and recognise the community benefits being delivered by some tenants. **This will be in line with the CLG approach to the use of community assets and co-produced with representatives of the of the voluntary and community sector.**

As part of the Community Buildings: Allocation and Charging policy, officers from the Asset Management team have carried out a review of all the council's community buildings, to better understand the activities that take place, assess the condition of the building, and carry out a survey with a view to eventually moving the tenants onto an open market rent or offer them the use of the space in a new community hub (see below). Visits have been **completed to all of the buildings** within the portfolio and there is broad support for the proposal to move tenants onto leases – albeit there are some concerns about the rent levels. A number of leases/lease extensions have been concluded recently, all on open market rental. **The outcome of this review will be reported back to Cabinet in October.**

Officers will also be proposing that the council create a number of 'community hubs'. These will provide

low-cost and flexible spaces for local community groups and TRAs to use on a sessional and shared basis, either based on a licence or a hire agreement. This will increase utilisation levels of the community buildings estate and ensure there are appropriate usage/property agreements in place for all building users/tenants. The creation of these hubs will also generate surplus properties as existing tenants move out of their current premises. The details of this will be contained within the Cabinet report and will be the subject of consultation in order to ascertain what the sector wishes to see in such a set-up. However, initial soundings of the sector indicate there is strong support for this.

One of the key challenges for the service, but also for the Council, will be the delivery of a new civic centre. The council purchased the Royal London Hospital site in February 2014 for this purpose and this site was confirmed as the preferred location by the Mayor in Cabinet in November 2015. Officers undertook a procurement exercise to appoint an architect-led multi-disciplinary design team. Stirling prize-winning firm, Allford Hall Monaghan Morris, were appointed following a highly competitive procurement exercise. The first iteration of the client brief is nearing completion and the design team are progressing their work. The site surveys are also being instructed and undertaken.

Outcome measures:

Some of the high level outcomes, that the delivery of the property section of the best value action plan aims to achieve, are:

- Own and occupy fewer buildings
- Reduce running costs of our buildings
- Maximise returns from income producing properties
- Increase occupancy levels of our buildings
- Maximise opportunities for co-location of services
- Review assets to identify other possible uses (housing, education etc.)
- Identify efficiencies in commercial estate management
- Improve use of planning gain
- Develop property information

These outcomes will be tracked by the following measures:

- Occupancy per M2
- Quantity of shared floor space in M2
- Total floor space in M2
- Number of interests disposed of and capital receipts delivered
- Positive decisions being made to retain and invest
- Positive decision being made to secure new property/long term assets
- Running costs per M2
- Total income per M2 from income generating assets
- Development of property information will enable targets to be set for: Improvements to average running costs; Annual revenue savings; Capital receipts that can be generated

Outstanding Best Value Actions

In addition to work in relation to Community Buildings highlighted above, there are three outstanding Best Value Property Actions.

- Compliance testing with revised protocols - Undertaken through the planned audit process. This is 80% complete and the fieldwork for the audit has taken place and the **report is expected within the next few weeks.**
- Report to CMT (and Cabinet if appropriate) to consider the introduction of an asset rental account (following implementation and embedding of Corporate Landlord Model) has been delayed - officers have been working to identify the resources to carry out this piece of work. Following the appointment of a new Head of Asset Management, this should now proceed at pace.
- The associated report back to the Commissioners on the asset rental account models has also been delayed as a result of the above.

Outstanding BV Property Actions	Completed BV Property Actions
3	33

Best Value Area	Organisational Culture	Overall Delivery Status: GREEN
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Progress Summary

Background

It is widely recognised that Tower Hamlets has been through a difficult and turbulent period. Member / officer relationships did not always display effective collaboration. A prolonged period of instability, with a number of interim appointments in the most senior roles, had an impact on the organisation’s ability to communicate and maintain a shared vision. The council was often too inward focused when it should have been seeking to share, compare and learn from other areas. Investors in People (IIP) assessments in 2014 and 2015 both identified that senior leaders needed to articulate and model effective behaviours and that, in some areas, staff were not being managed in-line with organisational values.

Organisational culture is recognised as a key component in moving the council forward. The aims of the Organisational Culture Action Plan are to: ensure that the culture of the organisation continues to be one which strives for continuous improvement; engage and invest in staff; ensure relationships between groups of members and between members and officers are professional, respectful, open and honest and rebuild trust in the areas where this has, or is perceived to have, broken down.

The key outcomes we are looking to achieve are:

- Staff engaged with and committed to delivering the Council’s vision and priorities
- Improved clarity and understanding of formal roles and responsibilities of the Executive, non-Executive and senior officers of the Council in a Mayoral system
- Effective working relationships between elected members, and between elected members and senior officers, to enable all to work together to achieve the best outcomes for Tower Hamlets and its residents
- A shared commitment to a set of agreed behaviours and cultural values to underpin formal roles and responsibilities
- A sustainable approach to maintaining and refreshing this shared commitment

Key achievements

A number of the actions detailed in the action plan have been completed and improvements are already visible:

- Members are working more effectively across party lines. The Mayor’s Transparency Protocol, and the Overview and Scrutiny Transparency Commission, have supported greater levels of openness around decision making and political leadership.
- The council has been working across London and with neighbouring boroughs on the development of devolution and joint working proposals.
- Staff communication is improving and more innovative methods of engagement are helping to close the gap between senior leaders and the workforce; creating more of a dialogue.

Areas where work continues to progress

Although these improvements are positive, culture change is a long term process and there remain a number of key elements that must be embedded in the organisation. Research shows that for people to be fully engaged in the purpose, strategy and values of their organisation, they need to be consulted and have input from the outset. Over the summer, engagement has been taking place with staff and members to develop a new set of core values and a cultural mission statement to encompass the whole organisational culture programme. In addition, work will take place to review the mechanisms and processes with which we engage with staff, ensuring that we have effective ways to communicate, consult and gather feedback from the workforce. These elements will be crucial for embedding other actions and improvements that are implemented as part of the programme.

In addition to consultation and engagement, delivering effective culture change requires new behaviours and working practices to be role modelled. People tend to act on what they see, not what they are told

and visible, transparent leadership is vital for the organisation to progress. This role modelled leadership is already evident with the Mayor and Chief Executive, and further progress has been made with the Senior Leadership Team and Members through the work with Solace. Leadership development is also reflected in the Workforce Strategy and a number of actions seek to create effective workforce role models.

It is recognised that it is the responsibility of all members and managers to ensure that values, behaviours and procedures are consistent with the council's cultural vision. Behaviours and actions that do not fit with the core values will be tackled and addressed.

The Council's Organisation Culture Plan is based around four work streams (2 primary and 2 contributory). Progress updates are provided to the Corporate Management Team, in its role as Transformation Board, on a quarterly basis, or by exception where actions are not expected to meet the agreed timeline. Each work stream is led by a member of CMT to ensure interaction between the streams, maintaining a clear and collaborative vision.

The first work stream is overseen by a cross-party, member and officer working group, the Governance Review Working Group, and was originally proposed under the Best Value Improvement Plan. This work stream focuses on the following:

- Creating a more transparent and open organisation
- Improving the clarity and understanding of formal roles and responsibilities in a mayoral system
- Building more effective working relationships between elected members and between members and senior officers
- Fostering a shared commitment to a set of agreed behaviours and cultural values to underpin formal roles and responsibilities
- A sustainable approach to maintaining and refreshing this shared commitment

The second work stream is Organisational Transformation, which focuses on improvements in relation to people, ICT, facilities and efficiency savings. Improvements in these areas are crucial if the council is to overturn the silo and bureaucratic working where it exists. Developing agile services requires members and officers to be responsive, flexible and efficient, and the use of technology will have an important role in the achievement of this.

In addition, there are two contributory work streams. These focus on specific areas that have been highlighted through the work undertaken by Solace and elsewhere: member/officer relationships and delegation of powers. Both work streams aim to improve collaborative working, trust and role modelled leadership behaviours that will have an impact on the wider workforce.

The Organisational Culture Plan is a work programme to overhaul the culture of the organisation and, as such, work will be ongoing for some time in each of the work streams. Feedback from the Commissioners has been incorporated into an updated version of the Plan, including the timescales for delivery. The change programme is purposefully iterative and evolving. The programme will be reviewed every six months and a 'health check' undertaken. This will provide an indication of progress and additional areas of focus to maintain the cultural development.

The Organisation Culture Plan incorporates, and supersedes, the Organisation Culture Best Value Plan agreed in March 2015, including the two outstanding actions which are being addressed through the Governance Review Working Group.

- Rebuilding elected member relationships - Develop an action plan to respond to recommendations of the review and deliver and monitor action plan
- Ensuring member and officer relations are appropriately conducted and constructive – An annual independently-commissioned review and report on officer/member grievances for review by HoPS and the respective Group Leaders making recommendations specific to minimising instances of officer-member grievances.

Outstanding BV Organisational Culture Actions	Completed Organisational Culture Actions	
2	38	

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<p>Cabinet</p> <p>6th September 2016</p>	
<p>Report of: Corporate Director Communities, Localities & Culture</p>	<p>Classification: Unrestricted</p>
<p>Review of Boroughwide 20mph limit</p>	

Lead Member	Councillor Ayas Miah, Cabinet Member for Environment
Originating Officer(s)	Margaret Cooper, Head of Engineering Tom Rawlings Acting Team Leader Design (Road Safety & Cycling)
Wards affected	All wards
Key Decision?	Yes
Community Plan Theme	A Good Place to Live

Executive Summary

- 1.1 At Cabinet on 4th February 2015, it was agreed to introduce an experimental 20 mph borough-wide speed limit. This was introduced in April 2015 covering all borough roads (i.e. not TfL roads) not already included in 20 mph zones. It expires on 13th October 2016. This report therefore provides as full an assessment as is feasible within this time period of the impacts of the scheme in order to inform a decision by the Mayor in Cabinet on whether to make the borough-wide speed limit permanent.

- 1.2 This report summarises the key findings of the review of the scheme, which are broadly positive. The review is attached as an appendix and includes the survey of residents' perceptions. It recommends that the speed limit be made permanent subject to a number of roads being omitted; that work continues to be undertaken to improve traffic calming and that road safety throughout the borough is reviewed.

Recommendations:

The Mayor in Cabinet is recommended to:

- Agree that the 20mph speed limit Experimental Order is made permanent subject to the roads listed in section 5.8 and 5.9 being omitted from the traffic order and reverting to 30mph.;
- Agree that the roads listed in 5.10 be prioritised for additional traffic calming to reinforce the 20 mph speed limit.
- Note that that further work will continue to review road safety throughout

the borough in order to target ongoing traffic calming work to those areas most in need of improvements

- Note that further awareness and education programmes will be delivered to build awareness and ownership of the 20 mph limit.

1. REASONS FOR THE DECISIONS

- 1.1 A decision on whether to make the experimental 20mph borough speed limit permanent or not, in its current or modified form, must be taken before the experimental traffic order expires in October 2016.

2. ALTERNATIVE OPTIONS

- 2.1 The alternative options available for Cabinet are :
- To agree the speed limit in full as it has operated experimentally since April 2015;
 - To reduce the extent of the speed limit by removing some roads from the traffic order and reverting to 30 mph on those prescribed roads;
 - To remove the 20 mph limit entirely from those impacted by the experimental order (which would not however affect the 85% of residential roads previously included in 20 mph zones)
 - In addition Cabinet may identify specific roads where additional traffic calming could be introduced to reinforce the 20 mph speed limit. Cabinet may not however extend the scope of the limit at this stage

3. DETAILS OF REPORT

3.1 Original Justification for introducing the limit:

The Department for Transport (DfT) publication 'Setting Local Speed Limits' states that the standard speed limit in urban areas is 30 mph, which represents a balance between mobility and safety factors. However, for residential streets and other town and city streets with high pedestrian and cyclist movement, local authorities are encouraged to consider the use of 20 mph limits. Collision rates are reduced at lower speeds and if they do occur, there is a lower risk of fatal or serious injury. Other significant benefits of 20 mph limits include quality of life and community advantages that encourage healthier and more sustainable transport usage such as walking and cycling. Based on this positive effect on road safety, and a generally favourable reception from local residents, traffic authorities are able, and encouraged by the DfT, to use their power to introduce 20 mph speed limits or zones.

- 3.2 Successful 20 mph zones and 20 mph speed limits should be self-enforcing, i.e. the existing conditions of the road together with measures such as traffic calming or signing, publicity and information as part of the scheme, lead to a mean traffic speed compliant with the speed limit. To achieve compliance

there should be no expectation on the police to provide additional enforcement beyond their routine activity, unless this has been explicitly agreed.

- 3.3 Speed is only one of many causes that contribute to traffic collisions. However, a reduction in vehicle speeds in the majority of residential areas would, over time, reduce the number and severity of collisions. Early studies of existing sign-only 20 mph speed limit schemes find that they generally produce an average reduction in speed of between 1 and 1.5mph. The associated reduction in collision rates is dependant to a degree on the average 'before' speeds.
- 3.4 It was in order to confirm the validity of this empirical evidence at the local level that a decision to introduce a 20 mph limit by way of an Experimental Traffic Order under Section 9 of the Road Traffic Regulation Act 1984 was taken.
- 3.5 An Experimental Traffic Order is a legal order to test a new traffic management scheme and this can last up to 18 months. It has allowed impacts of the scheme to be monitored and assessed, as well as allowing a prolonged period of consultation when residents themselves can provide their opinions on how effective the scheme has been. Having carried out consultation, it is for a local traffic authority acting reasonably and taking all relevant considerations into account, to determine whether a speed limit is appropriate for an area, having regard to national guidance issued by the Department for Transport (referred to above). The consent of the Secretary of State is not required for a 20mph speed limit order.
- 3.6 It is particularly important to note that the consultation should comply with the following criteria:
 - it should be at a time when proposals are still at a formative stage;
 - the Council must give sufficient reasons for any proposal to permit intelligent consideration and response
 - adequate time must be given for consideration and response; and
 - the product of consultation must be conscientiously taken into account.
- 3.7 Whilst there was no statutory requirement to consult with residents prior to making an experimental traffic order, a common law duty on the Council to do so arose. This was reported to Cabinet in February 2015, where Legal comments considered that the consultation carried out complied with the necessary criteria set out above.
- 3.8 The experimental order commenced in April 2015 and lines and signs were introduced to meet traffic regulation standards for defining this limit on the roads affected. Awareness was reinforced with banners, bus back advertising and community Speedwatch campaigns, alongside enhanced Police speed enforcement activity and press articles, though these activities were kept within reasonable budgets given that the scheme was experimental in nature. Whilst Police enforcement activity was increased in response to increased complaints about anti-social driving behaviour, warnings were given but no

tickets were issued for contraventions between 20-30 mph whilst the limit is experimental.

- 3.9 Approximately 85% of the Borough is currently within local 20mph zones: the majority of these zones have experienced a reduction in the total number of casualties of up to 70% since implementation although 4 have experienced an increase in those killed or seriously injured (Weavers, Campbell, Narrow Street and Antill zones). The speed limits in these zones will not be affected by the decision on the speed limit, which applies to roads outside those areas. Traffic calming measures in these zones are also being reviewed to design out further risk. Various methods of traffic calming are available and can include but not limited to
- Vertical deflection – Speed tables, sinusoidal humps and speed cushions
 - Horizontal – Width restriction and chicanes.
 - Speed indication devices and safety cameras
 - Signs and lines
 - Local police events – community speed watch and CUBO

4 FRAMEWORK FOR REVIEW

- 4.1 A review of the impact of the experimental scheme order has been carried out over the first 12 months of its operation, seeking to be as thorough and wide ranging as possible. It has collated all available relevant traffic data and best practice advice has been sought from recognised experts such as TfL Road Safety Unit and the Met Police Traffic Division.
- 4.2 Consultants were commissioned to carry out an independent review of the effectiveness of the 20 mph limit. Their report is attached as an appendix to this report and has covered:-
- Analysis of collision records comparing the average numbers of killed, seriously injured and slight accidents over the three calendar years prior to implementation of the limit to the twelve months post operation.
 - Analysis of before and after speed survey data from 55 sites through the borough.
 - Summary of comments received throughout the year on issues relating to the 20 mph limit
 - Consultation with statutory bodies including the Police, London Ambulance Service and Transport for London to gain their impressions and any quantitative data available.
- 4.3 The objectives of the report were to consider whether the experiment had been a success in terms of the original objectives discussed in section 3 above :-

- Identify where average speed change has been positive, negative or minimal (with an average change of only 1 -1.5 mph being the target).
- Identifying collision trends and patterns particularly relating to severity of injury.
- Reviewing compliance with the limit to identify where mitigating traffic management solutions to reduce vehicle speeds would be appropriate to make the limit more effective in self-enforcement.
- Understanding the factors that contribute to collisions within the study area and identifying preventative measures including recommendations for ongoing behaviour change, awareness, education and enforcement.
- Identifying any roads to be considered for reverting back to a 30mph speed limit where evidence suggests the limit has not been effective.
- Identify any other positive or negative impacts of the scheme which have come to light

5. **SUMMARY OF KEY FINDINGS**

- 5.1 The Technical Review of the first year of operation is attached as an Appendix. Broadly speaking, the anticipated benefits of the scheme in terms of accident savings and speed reduction have been shown to have been achieved however there are areas where modifications to the streets covered by the traffic order, or further investment in traffic calming to reinforce it, are recommended.
- 5.2 Best practice in analysing collision statistics would compare a three year average figure for before and after the implementation of the order, but due to time constraints on decision making, this is not possible at this stage. The latest available collision statistics post-implementation (April 2015 – January 2016) have therefore been factored to a common basis with which to compare to the average of the previous 3 years to provide the best available data. This work has shown the number of fatal and serious casualties have reduced by 20% and 22% respectively. However, the number of slight casualties has increased by 24%.
- 5.3 After comparing before and after speed survey results at approximately 50 sites, the average speed has fallen by 1.4 mph to an average of 18.32 mph. All roads surveyed recorded average after speeds within the threshold of 24 mph which the DfT guidance suggests is a suitable average speed for consideration of 20mph limits. (NB Manchester Road recorded 24.1mph.) Again, this represents a positive impact in line with the change anticipated according to empirical evidence in current guidance.
- 5.4 An internet survey of borough residents attracted over 900 replies and overall showed only 40% support for the limit compared to 53% disagreeing with it. The method was used because of its simplicity to implement and its low cost however it is important to understand the limitations of the survey. As it is self-selecting it can be expected to engage residents that have a particularly strong opinion one way or another. It is unlikely to engage those with no

opinion or who do not feel particularly strongly either way. Such survey methodology tends therefore to exaggerate the negative opinion as motivation to respond on a self-selected basis is most often generated by negative concerns. This survey method does not provide a representative sample of the population and it does not provide a safe basis upon which to conclude that the result is an accurate representation of the wider communities' views. It does, however, give those who want to express a view the opportunity to do so and have it considered and it gives some limited indication of the strength of opinion of the group that engaged. With these significant caveats in mind it is evident that this result varies on a geographical basis, suggesting that the speed limit is more widely endorsed by those expressing an opinion in the north of the borough than in the south. Of the 900 replies, over 500 came from the E14 postcode area and showed 65% were against the limit. However, a lower level of responses in each of E1, E2 and E3 showed only 44%, 37% and 27% (respectively) of respondents disagreed with the limit.

- 5.5 The questionnaire also asked whether 20mph limits should be introduced on TfL roads and there was broad disagreement with this suggestion. Whilst this is not at all statistically relevant and cannot be considered to represent the views of the wider community it will, never the less I be relayed to TfL who are carrying out their own pilot 20mph limits in a few areas, including part of Commercial Street. The Whitechapel section of the A11 Cycle Superhighway is also due to have a 20 mph limit imposed to address road safety concerns in the market area now that the central reservation has been removed. There are no other known proposals for changing speed limits on the TfL network at this time and no recommendation is made at this time to extend further.
- 5.6 Further questions in the survey asked whether respondents supported further investment in supporting measures and the responses can be summarised as follows:-
- an increase in physical traffic calming measures – approx. 50:50 split
 - an increase in police enforcement - 471 support : 289 against
 - an increase in driver education - 517 support : 203 against
 - an increase in driver awareness campaign - 466 support : 273 against
- 5.7 Detailed findings in the technical assessment identify on a road by road basis where problems have been identified which need further work to support a permanent 20 mph speed limit. If Members agree to make the limit permanent, the evidence would suggest the following modifications be introduced with funding through the LIP. Such programmes would then continue over the longer term, informed by regular assessments of road safety patterns and compliance with the limit.
- 5.8 The following roads are recommended to be withdrawn from the traffic order and returned to 30mph due to the nature of the network connection they perform. They are relatively short links connecting directly at both ends to TfL roads with 30 / 40 mph limits. Reverting to 30 mph limits will provide greater clarity for drivers :

- Leamouth Road;
- Leamouth Roundabout;
- Prestons Roundabout;

5.9 The following roads are recommended to revert to 30mph until such time that a design review can be approved for the entire link and delivered to support introduction of a more self-enforcing 20 mph speed limit:

- Prestons Road
- Cotton Street:
- West India Dock Road

An increase in collisions has been observed in the post implementation period on both Prestons Road and Cotton Street, although actual numbers involved are quite low. West India Dock Road has seen a very slight reduction. These are all relatively high speed roads designed to prioritise traffic capacity and vehicular access to the Isle of Dogs, however there are a number of key attractions along these routes which generate a high level of pedestrian movement across the routes e.g. Woolmore School, Poplar High St shops, bus stops, DLR stations and Limehouse Police Station. The scope of the change required to the design of these roads to become more pedestrian friendly (thus making the 20mph limit more self-enforcing) is more complex than simply providing traffic calming and would take some time and funding to deliver. It may even be the case that the wider difference in speed between compliant drivers and those driving faster has increased the level of risk. If the average speeds on these roads do not fall within the 24 mph threshold with signage alone, then the Police would be unable to support enforcement of the 20mph limit and continued higher speeds would negatively affect perception of the whole initiative.

5.10 The following roads are recommended to continue to be included in the 20mph speed limit but prioritised for additional traffic calming to improve compliance and make the limit more self-enforcing:

- Manchester Road : of the sites surveyed, this achieved the highest average speed in “after” figures. At 24.1 mph, this was at an acceptable level to meet the DfT guidance criteria for the use criteria but results could be improved with further traffic calming;
- Westferry Road : average speed reduced by 2mph to 23 mph – these results could be improved with further traffic calming;
- Cambridge Heath Road – no survey carried out but the nature of the southern section of the road suggests additional design work could improve compliance with the 20mph limit.

5.11 In conclusion, on the basis of the findings which have been reported to date, and bearing in mind the Council’s duty to exercise its functions under the Road Traffic Regulation Act 1984 to secure expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians), it is recommended that:

- The 20mph speed limit Experimental Order is made permanent subject to the roads listed in section 5.8 and 5.9 being omitted from the traffic order and reverting to 30mph.;
- Agree that the roads listed in 5.10 be prioritised for additional traffic calming to reinforce the 20 mph speed limit.
- Agree that further work continue to review road safety throughout the borough in order to target ongoing traffic calming work to those areas most in need of improvements
- Agree that further awareness and education programmes be delivered to build awareness and ownership of the 20 mph limit.
- Encourage the Police to continue to work with Council Officers to target enforcement of anti-social driving behaviour in areas identified as most in need.

6. COMMENTS OF THE CHIEF FINANCE OFFICER

- 6.1 TfL have actively encouraged the funding of Borough Wide 20 mph initiatives through the LIP allocation for road safety. A total of £445,000 has been spent to date as part of the implementation of the experimental traffic order and undertaking the reviews. Any further costs incurred will be accommodated within the future TfL LIP funding capital allocations made available for road safety.

7. LEGAL COMMENTS

- 7.1 The Council is a traffic authority for the purpose of the Road Traffic Regulation Act 1984 ('the 1984 Act') and has a duty to exercise its functions under that Act to secure expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians). So far as practicable, the Council must have regard to the following matters when carrying out its functions under the 1984 Act:

- the desirability of securing and maintaining reasonable access to premises;
- the effect on the amenities of any locality affected and the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run;
- the strategy prepared under section 80 of the Environment Act 1995 (national air quality strategy);
- the importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles; and
- any other matters appearing to the Council to be relevant.

- 7.2 The Council should also take into account its own overarching policies, set out in the Local Transport Plan.
- 7.3 Section 84(1) and (2) of the 1984 Act empowers the Council acting as a local traffic authority to make speed limit orders on roads within its area. Orders which the Council is empowered to make under section 84(1) can be made initially by way of an experimental traffic order under section 9 of the 1984 Act as is the case here. An experimental traffic order shall not continue in force for longer than 18 months.
- 7.4 The experimental traffic order comes to an end in October 2016 and a review of its impact has been assessed with a view to deciding whether a permanent order should be made and, if so, the scope of the order.
- 7.5 The Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 ('the 1996 Regulations') apply to any order made pursuant to section 84 of the 1984 Act by virtue of regulation 4 of the 1996 Regulations. Regulation 6 of the 1996 Regulations requires consultation as follows:

Case	Consultee
Where the order relates to, or appears to the Council to be likely to affect traffic on a road which is included in the route of a London bus service	The operator of the service and TfL
Where it appears to the Council that the order is likely to affect the passage on any road of ambulances and/ or fire fighting vehicles	The chief officer of the appropriate NHS trust and/ or the fire and rescue authority
All cases	The Freight Transport Association; the Road Haulage Association; and such other organisations (if any) representing persons likely to be affected by any provision in the order as the order making authority thinks it appropriate to consult

- 7.6 There is no statutory requirement to consult with anybody else but the Council must consider whether a common law duty arises. This common law duty imposes a general duty of procedural fairness upon public authorities exercising a wide range of functions which affects the interests of individuals (see *R (Moseley) v Haringey London Borough Council* [2014] UKSC 56, [2015] 1 All ER 495 at [35] per Reed LJ).

- 7.7 In considering whether a common law duty arises, has there been a promise that the Council would consult on a particular issue. This can be as a result of a decision or statement by Members (or an officer). This gives rise to a legitimate expectation. Specifically, the decision or statement must be clear, unambiguous, and not have any relevant qualification. The decision or statement must also have been made by someone who had actual or apparent authority to make that decision or statement. If it is not then the decision is *ultra vires*. This would also arise where the Council does not have the legal power to act in the way proposed.
- 7.8 Further has the Council's past practice been to consult on such proposal? If so, then again a legitimate expectation arises and which has been induced based upon the Council's past behaviour.
- 7.9 The common law duty would also arise where, in exceptional circumstances, a failure to consult would lead to conspicuous unfairness. Specifically a legitimate expectation can arise even without a decision/ statement or past practice, so as to prevent a public authority from acting so unfairly that its conduct amounts to an abuse of power. For example, is what is proposed likely to have a harmful impact on service users?
- 7.9 On balance, it may be considered advisable to generally consult in addition to consulting with the statutory consultees referred to in the above table.
- 7.10 The consultation should comply with the following common law criteria:
- (a) it should be at a time when proposals are still at a formative stage;
 - (b) the Council must give sufficient reasons for any proposal to permit intelligent consideration and response;
 - (c) adequate time must be given for consideration and response; and
 - (d) the product of consultation must be conscientiously taken into account.
- 7.11 The duty to act fairly applies and prior to undertaking a consultation exercise, it does needs to be considered whether the matter to be consulted on impacts on those with protected characteristics. If it does then the method of consultation can be adapted to ensure that those persons are able to respond to the consultation so as to inform the decision making process. For example, if a group of persons with a protected characteristic is a 'hard to reach' group then they may not be reached by traditional consultation techniques.
- 7.12 There should have a rational basis for any resolution that the 20mph speed limit Experimental Order is made permanent subject to the roads listed in section 5.8 being omitted from the traffic order and reverting to 30mph. The results of the consultation survey exercise must be taken into account. If it is intended to take a different approach than that indicated by the majority view, then there needs to be good reasons for taking that approach. There is material in the report both in favour of and against (see paragraphs 5.1 through to 5.10). Before making a final decision, Cabinet will have to be satisfied that the reasons in favour of adoption on a 20mph speed limit is

made permanent subject to the roads listed in section 5.8 being omitted from the traffic order and reverting to 30mph are sufficiently cogent.

- 7.13 When deciding whether or not to proceed with the proposals, the Council must have due regard to the need to eliminate unlawful conduct under the Equality Act 2010, the need to advance equality of opportunity and the need to foster good relations between persons who share a protected characteristic and those who don't (the public sector equality duty). Information relevant to the discharge of this duty is in the One Tower Hamlets section of the report.

8 ONE TOWER HAMLETS CONSIDERATIONS

- 8.1 By making the experimental traffic order permanent, it will provide road safety benefits to all residents of the borough, with particular positive impacts demonstrated for vulnerable road users including the elderly, young children, cyclists, pedestrians and mobility impaired people. An Integrated Equality Assessment was undertaken on the schemes proposed in the Local Implementation Plan which included the strategy for reducing road accidents. This confirmed the general level of benefit

9. BEST VALUE (BV) IMPLICATIONS

- 9.1 All works will be delivered through Contract CLC 4371 which commenced on October 1st 2014 after an extensive competitive tendering process. This contract includes 4 Lots for highway maintenance, capital improvements, street lighting maintenance and street lighting improvements.

10. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

- 10.1 DfT guidance suggests that overall, lower traffic speed has a positive impact on air quality and also helps to encourage travel by sustainable modes, such as cycling and walking, by making it more attractive.

11. RISK MANAGEMENT IMPLICATIONS

- 11.1 In order to minimise financial risk, no expenditure will be incurred without confirmation of allocations being approved by TfL. Although costs for making the limit permanent are relatively small, additional physical measures will require funding and budget availability will restrict the rate of delivery.
- 11.2 The proposal specifically aims to reduce road safety risk.

12. CRIME AND DISORDER REDUCTION IMPLICATIONS

- 12.1 LIP guidance requires schemes to take into consideration the Council's duties under Sn17 of the Crime & Disorder Act. Many complaints received about

speeding traffic are found to relate to other anti-social behaviour including drug-dealing in particular. Thus a positive benefit on such behaviour can be anticipated.

13. SAFEGUARDING IMPLICATIONS

13.1 None

Linked Reports, Appendices and Background Documents

Linked Report

- NONE

Appendices

- Appendix One: Review of the operation of the experimental 20 mph speed limit
- Report of consultation

Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012

-

Officer contact details for documents:

N/A

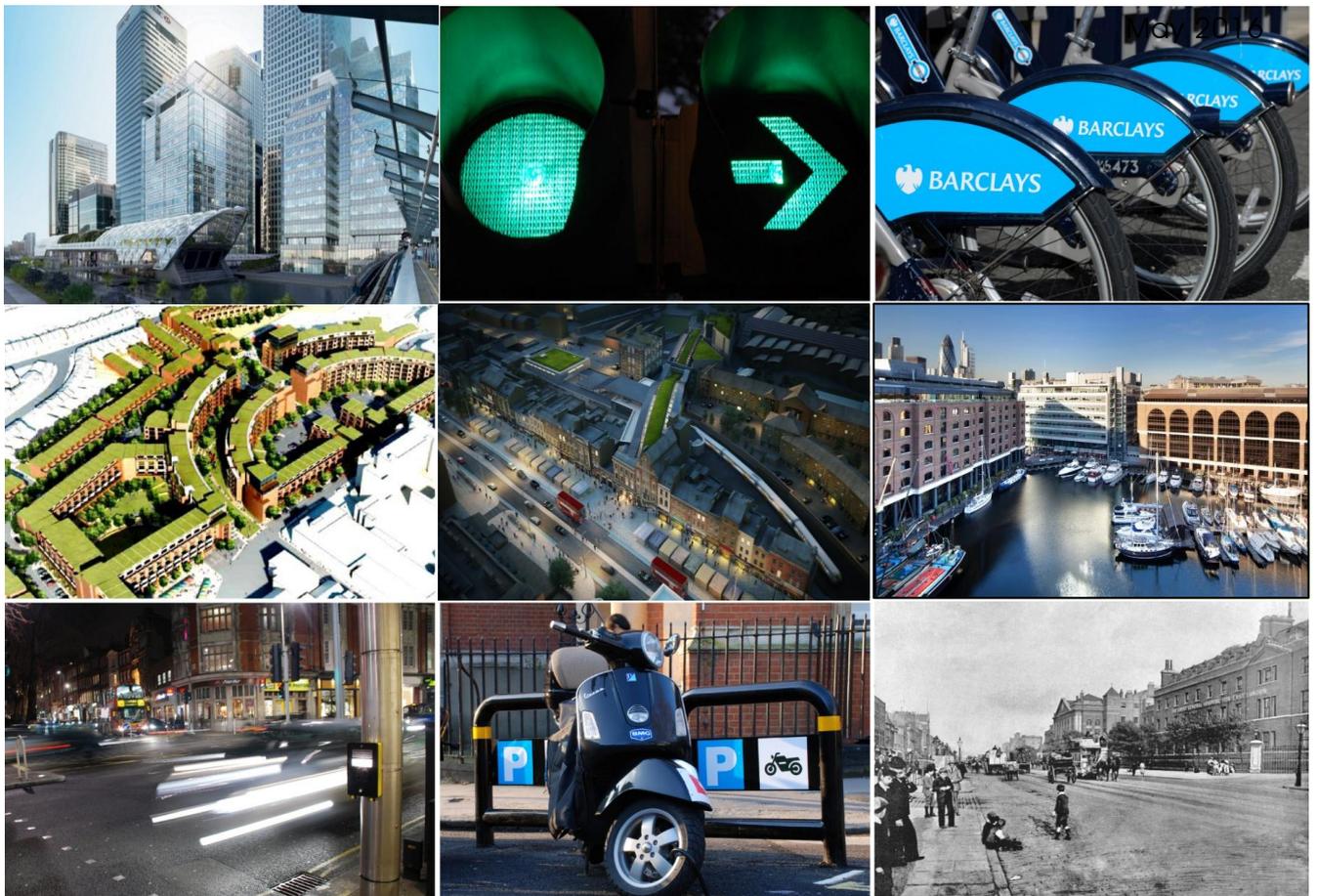
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PROJECT CENTRE

Tower Hamlets 20mph Speed Limit – Interim Review

London Borough of Tower Hamlets

August 2016



DOCUMENT CONTROL

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Report Reference	Issue	Description	Originator	Checked	Authorised
1000002939 CM/06	1	DRAFT	Carl McMahon 25.04.16	Carlos da Rocha 25.05.16	-
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1000002939	4	Update	H. Dhand 22.08.16	C. da Rocha 23.08.16	T. Mantle 24.08.16

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EXECUTIVE SUMMARY

Introduction

In November 2014, London Borough of Tower Hamlets (LBTH) commissioned Project Centre (PCL) to assist in the design of a borough wide 20mph speed limit, which became operational in April 2015 under an experimental Traffic Regulation Order.

Previous studies undertaken in the United Kingdom suggest that a correlation exists between reduced vehicle speeds and collision and casualty rates, which can also lead to economic benefits. In addition to road safety benefits, 20mph speed limits encourage a modal shift towards cycling and walking, which improves physical health and accessibility.

LBTH wish to understand whether the introduction of a 20 mph speed limit in the borough has led to any measurable benefits since its introduction. A review has therefore been undertaken and this report sets out the outcomes of that review. It is based on limited 'after implementation' data. As time goes on and more 'after' data becomes available, the results of this review will be further refined.

Data Analysis

Collision data analysis was undertaken for all roads within the borough over a thirty-six month period, from 1st April 2012 to 31st March 2015. This was the 'before' period, prior to implementation of the 20mph speed limit. 'After' collision data was available for a nine month period from 1st April 2015 to 31st December 2015. This was the latest available data at the time of this report's production.

Given that 'after' collision data is only available for a shorter nine month period than the 'before' base of 36 months, average annual collision rates have been calculated to provide direct comparison between data sets.

Collision rates for the shorter (9 month) period of available 'after' data were multiplied by a factor of twelve to calculate a factorised yearly average. This assumes that collisions during the 9 month 'after' period would continue to occur until the end of the 12 month period at the same rate of occurrence, e.g. 9 collisions over 9 month or one per month = 12 collisions over 12 months.

Prior to implementation vehicle speed was recorded at 54 locations using Automated Traffic Count (ATC) surveys, conducted in March 2015. 'After' ATC surveys were undertaken in March 2016 to provide a direct comparison.

Review Outcomes

Collisions are random events. The numbers of collisions that happen each year can vary considerably. Statistical variations can only be minimised by using a large sample size over many years, which is not currently available. All information provided by this review must therefore be read in context of the limited base data available and cannot be taken to be a definitive assessment of change. It does, however, provide an indication of the short-term outcome of the reduced speed limit. In summary, the analysis indicates that:

- The number of 'fatal' and 'serious' casualties has reduced by 20% and 22% respectively;
- The number of collisions at junctions has reduced by 13%; and
- The number of 'slight' injuries has increased by 24%, giving an overall increase of around 15% across the network.

Despite an overall increase in collision numbers, the occurrence of the severest forms of casualties, 'fatal or 'serious', have reduced. The high economic costs relating to severe collisions and associated casualties have reduced by 4%, resulting in an estimated £826,000 economic benefit (saving).

From an economic viewpoint, the costs associated with implementing the 20mph speed limit have brought benefits, and based on the analysis of 'after' casualty rates, have provided value for money.

In addition to the above, ATC data has shown that average vehicle speeds have fallen by 1.4 mph to 18.3 mph and; that the number of vehicles counted at survey sites has reduced by 17.5%. This reduction may be due to other factors, such as cycling growth in the borough, but may well be influenced strongly by a reduction in through traffic speeds.

Summary

This outline assessment of the 20 mph speed limit has shown mixed results. There have been some clear benefits in terms of reducing the most severe types of collision, along with average speed reductions and a notable decrease in traffic flows.

However, despite these successes, overall the numbers of slight injuries has increased and there are streets and areas where further engineering measures may be required to address high collision levels. Public perception of the scheme has also been eroded from the initial 80% support for its introduction. In a recent survey, less than 50% are now in favour of continuing the experimental order. Most of the survey respondents against the scheme were in the south of the borough, around the Isle of Dogs. It is important to note that this review does not provide a comprehensive and statistically robust assessment of change as it is based on limited post-implementation data. Ideally a full two or three year period after the introduction of the 20mph limit would be needed to provide more confidence in the 'before' and 'after' data.

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1. INTRODUCTION

1.1 Project Centre (PCL) has been commissioned by the London Borough of Tower Hamlets (LBTH) to undertake a full review of the 20mph borough wide speed limit that was implemented in April 2015 under an experimental Traffic Regulation Order.

1.2 The review assessed the effectiveness of the experimental 20mph speed limit through the analysis of 'before and after' collision and speed data. The analysis of data will enable the following to be determined.

- Identifying where change has been positive, negative or neutral;
- Identifying collision trends and patterns, particularly relating to 'slight' injuries;
- Identifying where mitigating solutions to reduce vehicle speeds would be most appropriate;
- Understanding the factors that contribute to collisions within the study area and identifying preventative measures;
- Identify where consideration might be advisable for reverting some of the roads back to a 30mph speed limit.

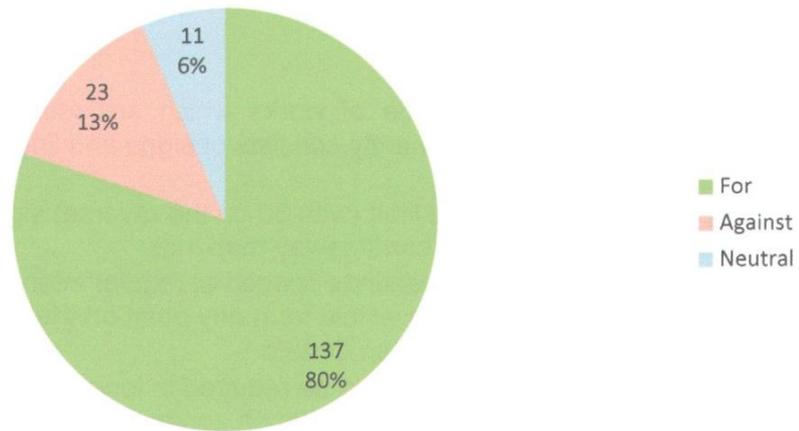
1.3 The analysis of traffic volumes, flow patterns, vehicle speeds and road safety data was undertaken through a desk top study exercise, using data supplied by LBTH.

1.4 To understand local resident's views following the implementation of the borough wide 20mph speed limit, LBTH undertook an online survey through the Council's website. In addition to the analysis of collision and speed data, LBTH have requested that PCL analyse and collate the survey data obtained from the consultation exercise with LBTH residents and others and report on the findings drawn. The survey closed on Monday 20th June 2016.

2. BACKGROUND

- 2.1 In November 2014, LBTH commissioned PCL to assist in the design of the 20mph borough wide speed limit. PCL provided a schedule containing signage and lining requirements and other infrastructure that was necessary for the implementation of the project, for the purposes of estimating and manufacturing. PCL drafted experimental traffic orders for all streets within the 20mph limit, excluding existing 20mph Zones, which were advertised and subsequently implemented.
- 2.2 The implementation of a borough wide 20mph limit was consistent with the objectives outlined by the Mayor of Tower Hamlets. The 2014/15 Strategic Plan (Priority 1.3) includes a commitment to plan and develop proposals for a borough wide 20mph limit, including consultation with TfL. The implementation of the limit aimed to provide a consistent approach to managing vehicle speeds across the borough and to integrate with neighbouring boroughs that have or are planning to implement their own default limit.
- 2.3 Analysis of Members Enquiries received by Transport & Highways over a twelve month period considered in the 2012 Road Safety Review noted that 25% specifically mentioned vehicle speed as a concern, whilst 69% were related to vehicle speed in general.
- 2.4 Analysis of the 932 personal injury collisions recorded in 2013, identified that 65% of these involved vulnerable road users: cyclists (254), pedestrians (192) and motor powered two-wheelers (214). These groups would be the major beneficiaries of a reduction in average traffic speeds achievable through a 20mph limit.
- 2.5 Approximately 85% of the borough was already within local 20mph zones; the majority of these zones have experienced a reduction in the total number of casualties of up to 70% since implementation, although four have experienced an increase in those killed or seriously injured (Weavers, Campbell, Narrow and Antill zones).
- 2.6 In order to raise awareness amongst residents and drivers of the proposed borough wide 20mph limit, informal public consultation was carried out to set out the justification for the initiative and gauge opinion on the principle of such a scheme. In total the council received 171 responses to the consultation as follows overleaf:

20mph Consultation Results



This figure includes 103 (60%) resulting from an on-line campaign organised by Tower Hamlets Wheelers (the local branch of London Cycling Campaign).

- 2.7 Guidance provided by the Department for Transport (DfT Circular 01/2013 – Setting Local Speed Limits) states that 20 mph speed limits should only be considered on roads where the average speed is at or less than 24mph. Unlike 20mph Zones, which require traffic engineering measures to slow traffic, 20mph limits employ boundary signs, repeater signs and 20mph roundel road markings to remind motorists they are travelling through an area with a reduced speed limit.
- 2.8 Previous studies undertaken in the United Kingdom have suggested that a correlation exists between reduced vehicle speeds and collision and casualty rates. As well as the road safety benefits, reducing collision and casualty rates also has economic benefits. The most recent figures provided by the DfT (2014) states that the cost of a 'fatal' casualty is estimated to cost the economy £1.8million as opposed to a 'serious' casualty, which is estimated to cost £206,000, and a 'slight' casualty which is estimated to cost £16,000. It can be seen that casualty reduction brings significant economic benefits.
- 2.9 Based on the positive effect lower vehicle speed has on road safety, local authorities are encouraged by the DfT to introduce 20mph speed limits or zones on major streets in addition to residential streets where there are, or could be, significant numbers of journeys on foot, and / or where pedal cycle movements are an important consideration, and this outweighs the disadvantage of longer journey times for motorised traffic. (Department for Transport Circular 01/2013 – Setting Local Speed Limits).
- 2.10 In addition to benefits associated with road safety, 20mph limits provide public health benefits. Lower vehicle speeds encourage walking and cycling as alternate modes of travel by making it more pleasant, which improves physical health and air quality, thus reducing the likelihood of ill health through cardiovascular and respiratory diseases

(National Heart Forum 2010). Compared to 30mph roads, 20mph roads are a lot quieter, which improves the quality of sleep for residents living in these roads. Lower vehicle speeds enable the elderly, families with small children and those with mobility issues to cross the roads more easily, thus reducing isolation and feelings of loneliness. Slower vehicle speeds also improve accessibility to work, leisure and educational opportunities, especially for those with restricted mobility, vision, hearing or mental health (20's Plenty for Us 2012).

- 2.11 A survey undertaken by the road safety charity BRAKE found that 78% of respondents felt that a 20mph speed limit should be the norm around schools, on residential streets and in village, town and city centres. According to the charity, areas that have already introduced 20mph limits have seen "significant reductions in casualties", including Portsmouth where they fell by 22%, and Camden where collisions reduced by 54%.

3. METHODOLOGY

- 3.1 The impact of the 20mph speed limit has been assessed using 'before and after' data relating to collision occurrence and speeds.
- 3.2 Collision data was provided by TfL on a road by road basis for all roads within the LBTH borough for a thirty-six month period from 1st April 2012 to 31st March 2015. This time period is 'before' implementation of the 20mph speed limit and forms the baseline 'before' data.
- 3.3 Further collision data was obtained for a nine month period from 1st April 2015 to 31st December 2015, which is the latest available information post-scheme delivery, i.e. 'after' data.
- 3.5 The available collision data provided a nine month 'after implementation' snapshot of collisions. There is generally a minimum lead in time of three months for data to be processed by the Police; therefore 12 months post implementation data was not available at the time of this review.
- 3.6 Before data was averaged over three years to calculate an annual average rate of collisions and casualty severities by road and area before the scheme was introduced. To extrapolate an annual average collision figure post-implementation, the 9 months of data available was converted to an average monthly collision rate and then multiplied by 12 to give an annual figure. This process provides comparative annual averages before and after scheme delivery.
- 3.7 It is not ideal to extrapolate data in this way as collision rates are subject to considerable variances throughout the year, and over longer periods of time. However, given that only 9 months of information was available at the time of the review, this process provides a reasonably robust indicator of the likely average over a full 12 month period.
- 3.8 To draw more accurate conclusions from the data it is recommended that a complete 36 month period (or 1 year minimum) of data should be used for comparative purposes. It is worth noting however that changes being made to the borough's 20mph zones and other road network changes may cause random fluctuations in the collision data for the borough wide 20mph limit. These changes may see an increase on borough roads due to the offset of traffic volumes from other design changes on the TLRN (for instance) or could see a reduction due to improved driver behaviour. Although no 20mph speed limit changes have been installed on TLRN, the reported accident statistics include collisions that have occurred on the TLRN.

4. COLLISION ANALYSIS

- 4.1 The primary aim of the analysis is to ascertain the impact that the 20mph borough wide speed limit has had on the number of collisions occurring within the borough on both local roads and TLRN. Further to this, the analysis has looked to identify any changes that may have occurred in terms of the severity of collisions (slight, serious and fatal).
- 4.2 Figure 1 indicates that the overall number of collisions that have occurred throughout the borough has increased by 15%. The number of collisions at junctions has reduced by 13%, whereas collisions on links (lengths of road between junctions) and cells (streets within specific residential areas within the borough) have increased by 20% and 35% respectively.
- 4.3 Figure 2 presents the number of casualties by severity, before and after the implementation of the 20mph speed limit. It can be seen that the overall number of 'fatal' and 'serious' casualties involved in collisions after the implementation of the 20mph speed limit has reduced by 20% and 22% respectively. The number of 'slight' casualties has increased by 24%.

Total Annual Collisions (averaged)				
Junctions, links and cells				
Location	Before (avg)	After (1yr adjusted)	Difference (numbers)	Difference (%)
Junctions	109.3	94.7	-14.7	-13%
Links	246.3	296.0	49.7	20%
Cells	88.7	120.0	31.3	35%
Total	444.3	510.7	66.3	15%

Figure 1: Overall number of collisions 'before' and 'after' implementation by junction, link and cell

Total Annual Casualties (averaged)				
By Severity of injury				
Location	Before (avg)	After (1yr adjusted)	Difference (numbers)	Difference (%)
Fatal	1.7	1.3	-0.3	-20%
Serious	43.0	33.3	-9.7	-22%
Slight	453.7	564.0	110.3	24%
Total	498.3	598.7	100.3	20%

Figure 2: Overall number of casualties 'before' and 'after' implementation by severity type

- 4.4 Figures 3 and Figure 4 below illustrate the impacts of the 20mph speed limit at junctions and on links, respectively. With reference to Figure 3, it can be seen that there have been no recorded fatalities at junctions within LBTH since the implementation of the 20mph

speed limit (therefore an assumption that no fatalities will occur in the 3 months to Dec15 has been made in figure 3).

4.5 The number of recorded 'serious' collisions at junctions has decreased by 53% and the number of 'slight' collisions has decreased by 4%. Analysis by road user type has determined that the number of pedestrian collisions at junctions has reduced by 51%, whilst the number of cyclist collisions has increased by 2%; which is effectively the same value, as only increased by 1 collision (rounded up from 0.7).

Junctions				
Number of Casualties at junctions				
Total annual averages	Before (avg)	After (1 year adjusted)	Difference (numbers)	Difference (%)
Fatal	0.3	0	-0.3	-100%
Serious	11.3	5.3	-6	-53%
Slight	111.3	106.7	-4.7	-4%
Pedestrian	21.7	10.7	-11	-51%
Cycle	36.7	37.3	0.7	2%

Figure 3: Number of junction collisions 'before' and 'after' implementation of borough wide 20mph speed limit

Links				
Number of Casualties at links				
Total annual averages	Before (avg)	After (1 year adjusted)	Difference (numbers)	Difference (%)
Fatal	1	1.3	0.3	33%
Serious	22.7	22.7	0	0%
Slight	249	316	67	27%
Pedestrian	61.7	93.3	31.7	51%
Cycle	75	74.7	-0.3	0%

Figure 4: Number of link collisions 'before' and 'after' implementation of borough wide 20mph speed limit

4.6 Figure 4 shows the results observed on 'links'. Analysis shows an increase in the number of 'fatal' casualties post speed limit implementation due to the factorisation method, whereas in reality the 'before three year average' is 1 'fatal' casualty and the after is 1 'fatal' casualty in the 9 month since the 20mph speed limit's implementation. However due to the low number the factorisation appears substantial at 33% (increase). There has been no change in the number of 'serious' casualties and a 27% increase in 'slight' casualties. An increase in pedestrian casualties on link roads of 51% is observed and a negligible decrease of 0.3 occurrences in cycle casualties since the implementation of the scheme.

4.7 Figure 5 below displays the roads with the highest number of collisions before and after the implementation of the 20mph limit, listed highest to lowest of 'after' actual (not factorised) recorded collisions. Eight of the ten roads show notable increases in collisions, whilst there is a reduction in collisions on Westferry Road and Grove Road. Differences between the recorded 'before' 1 year maximum figure (highest of the three years) and the 'after' 1 year adjusted figure show decreases on four of the ten roads, indicating that the assumed collision trend would not exceed the annual maximum previously recorded. Other roads show marginal increases.

Road Name	After (9 months)	Before				After (1 year adjusted)	Before (avg)	Averages		1 year max before	Diff btn After 1 yr adj vs 1 yr Max
	Apr 15 - Dec 15	Apr 14 - Mar 15	Apr 13 - Mar 14	Apr 12 - Mar 13	Difference			Difference (%)			
Bethnal Green Road	28	31	18	43	37.3	30.7	6.7	22%	43	-5.7	
Hackney Road	28	17	22	23	37.3	20.7	16.7	81%	23	14.3	
Cambridge Heath Road	26	29	20	40	34.7	29.7	5	17%	40	-5.3	
Roman Road	20	25	15	22	26.7	20.7	6	29%	25	1.7	
Old Ford Road	14	14	12	7	18.7	11	7.7	70%	14	4.7	
Cable Street	11	13	14	13	14.7	13.3	1.3	10%	14	0.7	
Devons Road	11	4	12	11	14.7	9	5.7	63%	12	2.7	
Prestons Road	11	9	5	9	14.7	7.7	7	91%	9	5.7	
Westferry Road	11	25	17	17	14.7	19.7	-5	-25%	25	-10.3	
Grove Road	8	16	12	6	10.7	11.3	-0.7	-6%	16	-5.3	

Figure 5: Top ten sites with the highest number of collisions after the implementation of the 20mph limit.

4.8 This increase in collisions after the implementation of the 20mph could be attributed to TfL's RMP and the diversions created during the implementation of CS2. Figure 9 in para 5.10 shows that 50% of these streets have seen an increase in the volume of vehicles compared to prior to the implementation of the 20mph limit, therefore the increase in collisions could be attributed to the increase in the number of vehicles.

4.9 Based on the costs of collision and casualty using the values discussed in Section 2 relating to the cost to the economy, it is possible to identify the financial economic impact of the 20mph speed limit on the economy. Figure 6 below shows the costs to the economy of collisions and casualties before and after implementation of the limit.

Economic costs as a result of casualties					
Casualty severity	Before	After (1yr adjusted)	Difference	Difference (%)	% of Cost of Severity
Fatal	£3,000,000	£2,400,000	-£600,000	-20%	13%
Serious	£8,858,000	£6,866,667	-£1,991,333	-22%	38%
Slight	£7,258,667	£9,024,000	£1,765,333	24%	49%
Total	£19,116,667	£18,290,667	-£826,000	-4%	

Figure 6: Economic costs of collisions 'before' and 'after' implementation of borough wide 20mph speed limit

4.10 The economic costs relating to the effects of collisions and casualties have reduced by 4%, resulting in a £826,000 economic benefit. This suggests that the implementation of the 20mph limit scheme has demonstrated value for money.

5. TRAFFIC SPEED ANALYSIS

- 5.1 Automated traffic count surveys (ATC's) were undertaken at fifty-four sites within the borough during March 2015. Data from these sites has been reviewed and compared to a further set of ATC surveys undertaken at the same sites during March 2016.
- 5.2 The ATC data obtained during March 2016 provides a depiction of twenty four hours of traffic flows on the surveyed roads, as provided in the speed summary from PAX. It is our assumption that there are a few anomalies / data inaccuracies in the reporting of this data; therefore full twenty-four hour raw data has been requested from the supplier. At the time of writing this report not all of the data was available.
- 5.3 Six sites were removed from the data sets as they provided incomplete or partial data, which were affecting the accuracy of the results. The sites removed from the data were:
- Bonner Road
 - Bromley High Street
 - Bromley Street
 - Byng Street
 - Redmans Road
 - Fairfield Road
- 5.4 85th percentile speed is a value that is used for establishing regulatory speed zones and is the speed at which 85% of all vehicles are travelling at or below under free flowing conditions. Since the implementation of the 20mph speed limit, there has been a reduction of approximately 1.9mph in the 85th percentile speed. It is currently 22.31mph, which compares to 24.24mph recorded in 2015.
- 5.5 There has also been a reduction in mean speeds across the forty-eight sites in the summary, which identified a 1.4mph reduction to 18.32mph in 2016 compared to 19.72mph recorded in 2015. This average speed across the sites is below the 24mph guidance that is set by the Department for Transport when considering a 20mph limit.
- 5.6 During the March 2015 survey, 5,736,307 vehicles were observed to travel through the count sites, compared to 4,733,957 vehicles during the March 2016 survey, a reduction of 17.5%. This reduction in vehicle numbers could be attributed to the implementation of the 20mph speed limit and other factors such as congestion arising from construction of TfL's Roads Modernisation Programme (RMP).
- 5.7 The implementation of 20mph zones and limits encourages the use of walking and cycling as a mode of transport. The reduction in the number of vehicles on the network could be attributed to more pedestrians and cyclists using the route, or more drastically

drivers seeking alternative routes around the borough rather than through it. This reduction is also likely to have been impacted by the introduction of Cycle Super Highway 2 (CS2).

5.8 Figure 7 displays the top twenty sites with the highest mean speeds recorded in 2016, all of which are 24mph or below. This speed indicates that they are within the guidelines to be included within a 20mph limit. The speeds recorded in 2016 across these sites averaged between 7mph and 24mph, compared to 2015 where the speeds ranged between 13mph and 27mph.

Site No	Street Name	Mean Average	
		2015	2016
54	Manchester Road	24.65	● 24.10
7	Bow Common lane (110)	24.25	● 23.65
51	Roman Road	25.75	● 23.30
28	Parnell Road	24.25	● 23.00
53	Westferry Road	25.00	● 23.00
49	Grove Road	23.60	● 22.90
26	Old Ford Road (110)	21.35	● 22.20
46	Chrip Street	22.40	● 22.20
42	White Horse Lane (60)	20.45	● 21.80
19	East Ferry Road	27.85	● 21.75
33	Rhodeswell (109)	21.55	● 21.55
13	Campbell Road	22.30	● 21.15
50	Hackney Road	21.60	● 21.15
18	Devons Rd	22.55	● 20.95
27	Old Ford Road (293)	21.80	● 20.65
48	Globe Road	20.65	● 20.65
8	Bow Common lane (136)	19.95	● 20.45
23	Monier Road	19.40	● 20.00
38	Waping High Street	20.45	● 19.65
44	Bethnal Green Road	20.80	● 19.40

Figure 7 – Top twenty sites with the highest recorded mean speed in 2016.

5.9 An increase in mean vehicle speed was recorded at ten survey sites compared with the 2015 survey data (see Figure 8 overleaf). It is important to note that although these sites saw an increase in mean speed, all of these locations had a mean speed below 24mph, the threshold at which they can be considered to be included in a 20mph limit. Bazely Street recorded the highest increase in mean speed of 21.5% with a 3.25mph speed increase in 2016 to 18.35mph. Cable Street recorded the largest decrease in mean speed of 52% with a reduction of 14.75mph down to 13.65mph in 2016.

Site No	Street Name	Mean Average		Difference
		2015	2016	
4	Bazely Street	15.1	18.35	3.25
35	St Pauls Way (37)	16.8	18.4	1.6
42	White Horse Lane (60)	20.45	21.8	1.35
17	Cordellia Street	15.5	16.35	0.85
26	Old Ford Road (110)	21.35	22.2	0.85
36	Tarling Street	15.25	15.9	0.65
12	Campbell Road	18.7	19.3	0.6
23	Monier Road	19.4	20	0.6
8	Bow Common lane (136)	19.95	20.45	0.5
20	Ferry Street	14.95	15.05	0.1

Figure 8 – Ten sites that recorded an increase in mean speed compared with 2015 survey data

5.10 Although there was a general reduction in the number of vehicles surveyed across the forty-eight sites, there were thirteen sites which showed an increase in the number of vehicles (see Figure 9). It is believed that this increase in volume is attributed to external factors, primarily on the TLRN, causing traffic reassignment away from the TLRN and onto local roads.

Site No	Street Name	Total Volume		Difference
		2015	2016	
35	St Pauls Way (37)	121257	202323	81066
44	Bethnal Green Road	188498	269359	80861
34	St Pauls Way	126548	206030	79482
14	Cannon Street Road	37415	98631	61216
15	Cannon Street Road	95013	131715	36702
49	Grove Road	193170	225710	32540
7	Bow Common lane (110)	69374	87317	17943
45	Cable Street	38458	54239	15781
52	Vallance Road	171284	186208	14924
48	Globe Road	106710	117811	11101
50	Hackney Road	319698	328424	8726
26	Old Ford Road (110)	122862	129374	6512
1	Alie Street	29170	32670	3500

Figure 9 – Survey sites which recorded an increase in the number of vehicles

5.11 Campbell Road recorded the largest reduction in numbers of vehicles, from 218,247 observed vehicles in 2015 to 46,817 observed vehicles in 2016, this reduction is due to a closure at its junction with the A11 while works were undertaken on the A11. St Pauls Way recorded the largest increase in traffic volume with an additional 81,066 vehicles compared to 2015, this is understood to be due to traffic reassignment from the TLRN.

Note: these large recorded reductions in traffic volume could be attributed to TfL RMP (roads modernisation program), traffic reassignment on to the cycle superhighway

network. It can also cause large increases on other sections of the network as can be seen in figure 9 through traffic reassignment. The volumes of traffic will never return to the before scheme rate due to the major changes to the network.

5.12 Three locations have been identified where the mean speeds and volume of vehicles has increased in 2016. These locations are:

- Bow Common Lane
- Old Ford Road (110)
- St Pauls Way

These routes will require more detailed assessment to determine whether engineering measures could be justified to further reduce speeds and / or discourage further traffic growth.

5.13 **Appendix A** of this report contains a table that compares the 2015 and 2016 data for each ATC site. A red counter denotes that there has been an increase in vehicle speed on that particular road, whilst a green counter denotes a reduction in vehicle speed. This outlines the ACPO (Association of Chief of Police Officers) guidelines for enforcement and highlights the number of instances where the threshold speed was exceeded and where a Fixed Penalty Notice will be issued when education is not appropriate. It accepted that the threshold speed is 10% plus 2mph as can be seen from the below table.

Limit	Device tolerance	Fixed Penalty when education is not appropriate	Speed Awareness if appropriate		Summons in all other cases and above
			From	To	
20 mph	22mph	24 mph	24 mph	31 mph	35 mph
30 mph	32 mph	35 mph	35 mph	42 mph	50 mph
40 mph	42 mph	46 mph	46 mph	53 mph	66 mph
50 mph	52 mph	57 mph	57 mph	64 mph	76 mph
60 mph	62 mph	68 mph	68 mph	75 mph	86 mph
70 mph	73 mph	79 mph	79 mph	86 mph	96 mph

All speeds identified above are those shown on the speed device, speedometer or other detection devices

5.14 LBTH has requested performance data from the LAS (London Ambulance Services) and LFB (London Fire Brigade) as there were concerns raised prior to the implementation about blue light response times. Unfortunately we are still awaiting a response from LAS. However Keith Wilson Station Manager at Bethnal Green Fire Station has confirmed that the experimental order has had no effect on the response times for London Fire Brigade in Tower Hamlets. They have also stated that “*We support the reduction in improving road safety*” and that from an emergency response point of view the 20mph limit has not affected their attendances.

6. ROADS TO RETURN TO 30MPH

6.1 Through LBTH officer observations and public perceptions, it was thought that there may be some locations where it is appropriate to revert some of the roads back to a 30mph speed limit. The roads which were considered for 30mph are listed below:

- Leamouth Road Roundabout
- Leamouth Road
- Cotton Street
- Prestons Road – up to the Blue Bridge
- Prestons Road Roundabout
- West India Dock Road
- Westferry Road (A126) – between West India Dock Road and West India Avenue

Collision Data

6.2 The below table outlines the number of collisions that occurred at the sites that were reviewed to be returned to a 30mph speed limit.

Road Name	Apr 15 - Dec 15	Apr 14 - Mar 15	Apr 13 - Mar 14	Apr 12 - Mar 13	After (1 year adjusted)	Before (avg)
Leamouth Road	1	0	2	2	1	1
Cotton Street	6	5	4	1	8	3
Prestons Road	11	9	5	9	15	8
West India Dock	2	7	6	4	3	6
Westferry Road	11	25	17	17	15	20
Leamouth Roundabout	-	-	-	-	-	-
Prestons Road Roundabout	-	-	-	-	-	-

Figure 10 - Number of collisions that occurred on roads proposing to retain 30mph speed limit.

6.3 On West India Dock and West Ferry Road there has been a reduction in the number of collisions. This would support the retention of the 20mph limit on these roads as it appears to have had a positive impact on driver behaviour. Reverting the speed limit back to 30mph may lead to an increase in the number of collisions.

6.4 No collision data was available for Prestons and Leamouth Roundabouts. Cotton Street was the only location that saw an increase in the number of collisions from the 'before' years, although none of these collisions identified speed as a contributory factor - the

majority were rear end shunts and lane change collisions. On Leamouth Road and Prestons Road there was no change in the average number of collisions.

ATC DATA

6.5 Of the seven locations identified for reverting back to 30mph, only one had been selected as an ATC survey site, this location was West Ferry Road. This location saw a 2mph reduction in speed from a mean speed of 25mph to 23mph. This speed data suggests that Westferry Road is suitable to retain as a 20mph speed limit, this also supports guidance provided by the Department for Transport (DfT Circular 01/2013 – Setting Local Speed Limits) as the speed is below 24mph.

6.6 We therefore assessed these locations against TfL’s Roads Taskforce Classification to understand the movement type along the route and determine from this what we believe the most appropriate speed would be depending on their use and function. The diagram below illustrates how classifications are defined:

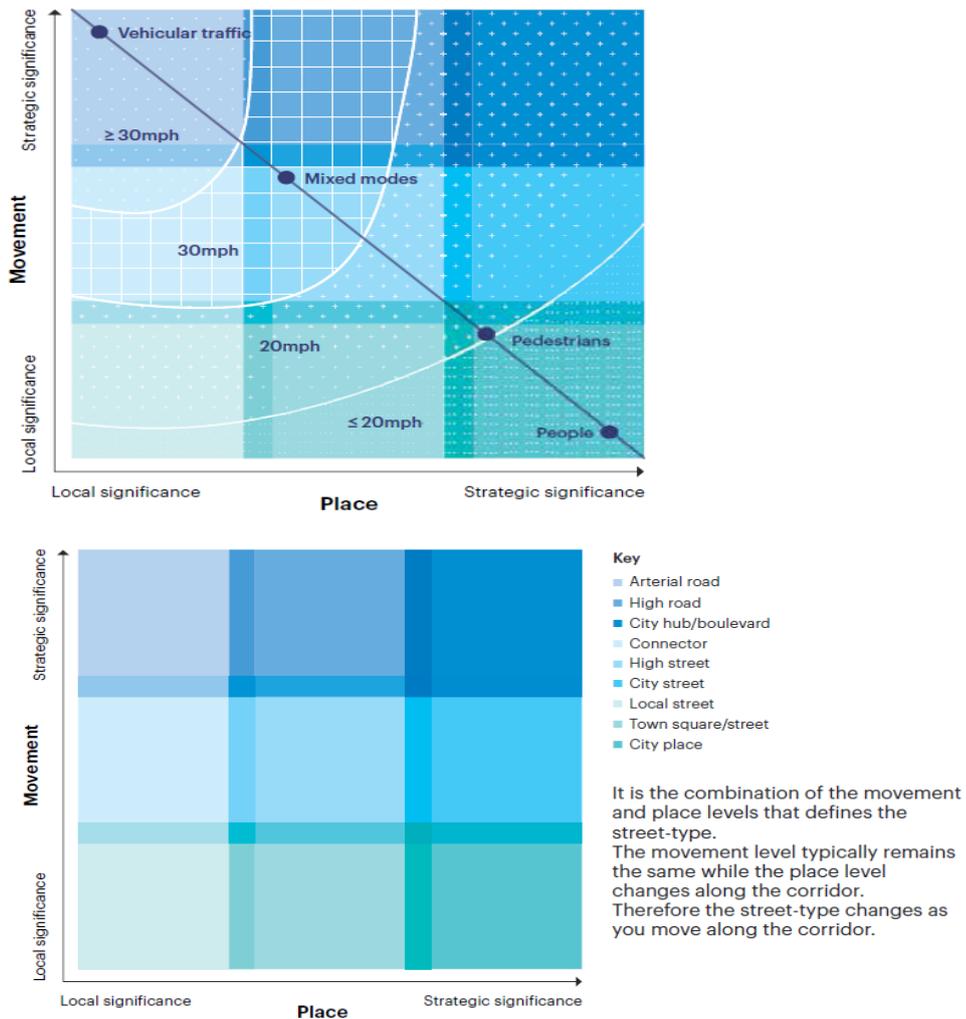


Figure 11 RTFC classification table

- 6.7 Leamouth Road (and Leamouth Road Roundabout) is a north-south link between the A13 East India Dock Road, A1261 Aspen Way and Lower Lea Crossing into the London Borough of Newham. The road is a 200m, two lane two way road with carriageway widths between 7 and 14m. The northbound approach is 4 lanes at the A13 junction. The nature of Leamouth Road is very straight with very low to no place value with a high strategic movement value. This layout does not usually tend to lend itself to a 20mph speed. Vehicles exiting the A1261 Aspen Way and Lower Lea Crossing have been travelling at 40mph and are likely to continue due to the nature of the road being very similar. These routes can all be described as arterial or connector routes under the roads task force classification system.
- 6.8 Cotton Street is a direct north-south link between A13 East India Dock Road and A1261 Aspen Way. The road is a 300m long two lane, two way road with a carriageway width of approximately 14-15m. The northern section of Cotton Street has a central reservation dividing the four traffic lanes, however south of the pedestrian crossing the road is four lanes wide without any pedestrian refuge area. The nature of the road does not lend itself to a 20mph speed limit due to its topographical layout as there are few trip generators or reasons to stop on this route. The local area is also bounded by the rail line to the west and the A102 to the west. There is a pedestrian crossing which facilitates east-west pedestrian movements, i.e. to Woolmore Primary School on Woolmore Street and local housing estates. The route can be defined as a connector road due to its low place significance and strategic movement significance. The road does not have any trip generators along the route nor does it have any side roads coming off the route. Given that the route links the 40mph A1261 and 30mph A13, it is envisaged that driver behaviour will not change on this connector route due to it having similar characteristics to an arterial route.
- 6.9 Prestons Road links the A1261 Aspen Way (at Prestons Road Roundabout) to the A1206 Manchester Road; the section under consideration is the link between the Prestons Roundabout and the Blue Bridge. It is very similar in nature and topographical layout to the Cotton Street. Pedestrian east-west movements are accommodated via the pedestrian facilities at the junction with Yabsley Street, and Baffin Way, near the roundabout. There is a signalised pedestrian crossing to the south of Lovegrove Walk. Much of Prestons Road is flanked by property boundary walls, particularly on the west side. Prestons Road is approx 650m in length, it is not recommended that this route retains the 20mph speed limit due to it being two lanes in each direction, at its northern section, and south of Yabsley Street, reducing to very wide single vehicle lanes in each direction including a bus lane northbound and a cycle lane southbound. The road has a wide central hatch marking running down its centre with left/right turn slip lanes. It is therefore very unlikely that drivers would adhere to a 20mph limit. Unfortunately we do not have any data to qualify this position.
- 6.10 West India Dock Road links the A13 Commercial Road to the A1261 Aspen Way. West India Dock Road is a 750m long, two lanes, two way A-Road; it is approximately 20-22m wide for the majority, whilst some locations increase to as wide as 30m. The nature of this

street does not lend itself to a 20mph speed limit as a result of the topographical nature; whilst there is a small parade of shops near the junction with the A13 it is designed to move people between places. There is also a police station on West India Dock Road which could be defined as a trip generator and Westferry DLR station is also in close proximity and could be used as a route to and from the A13 Commercial Road. West India Dock Road can be defined as an Arterial Road, a high capacity urban road. The primary function of an arterial road is to deliver traffic from connector roads at the highest level of service. A speed limit of 20mph does not match the characteristic of West India Dock Road as it forms a key link to Aspen Way and the Limehouse Link.

- 6.11 Westferry Road (between A1261 West India Dock Road and West India Avenue) links West India Dock Road and West India Avenue/ Marsh Wall. This section of Westferry Road is 450m long, two lanes, two way A-Road and is approximately 20m wide. It increases to 27m wide becoming 6 lanes at the Limehouse Link junction. There are also long extents of pedestrian guard railing along either or both sides of the road and complex road layouts, particularly at junctions. The nature of this street does not lend itself to a 20mph speed limit due to the topographical nature. Westferry Road can be defined as an Arterial Road, a high capacity urban road. The primary function of an arterial road is to deliver traffic from connector roads at the highest level of service. A speed limit of 20mph does not match the characteristic of Westferry Road as it forms a key link to the Limehouse Link. Although there was an overall reduction in average speed and collisions on this road it is believed that this may be attributed to increased congestion and Transport for London RMP works that have caused the data to show variance.
- 6.12 No additional locations were identified where the RTFC classification would require the speed limit to be returned to the 30mph limit.

7. PERCEPTION SURVEYS

7.1 LBTH undertook a perception survey; an online consultation exercise by means of a web based survey on the Council’s website; to understand local residents (and others) views following the implementation of the borough wide 20mph speed limit. The perception survey closed on the 20th June 2016 and a sample copy of the survey has been included in **Appendix B** for reference. A postcode heat map plot and count marker have been collated from the consultation responses and included in **Appendix E**.

7.2 904 consultation responses were received. Question 2 of the survey asked “*Are you in favour of 20mph speed limits in general across London*”; 39% (353 respondents) answered yes they are, 57% (514 respondents) answered no they are not in favour of 20mph limits, 4% (37 respondents) either did not know or did not answer this question.

7.3 53% (483 respondents) disagreed with the proposals to make the experimental 20mph limit on borough roads permanent (342 strongly disagree, 141 disagree). 40% (361 respondents) agreed with the proposals to make the experimental 20mph limit on borough roads permanent (278 strongly support, 83 support). 7% (60) of respondents either had no view or did not answer the question. See breakdown below.

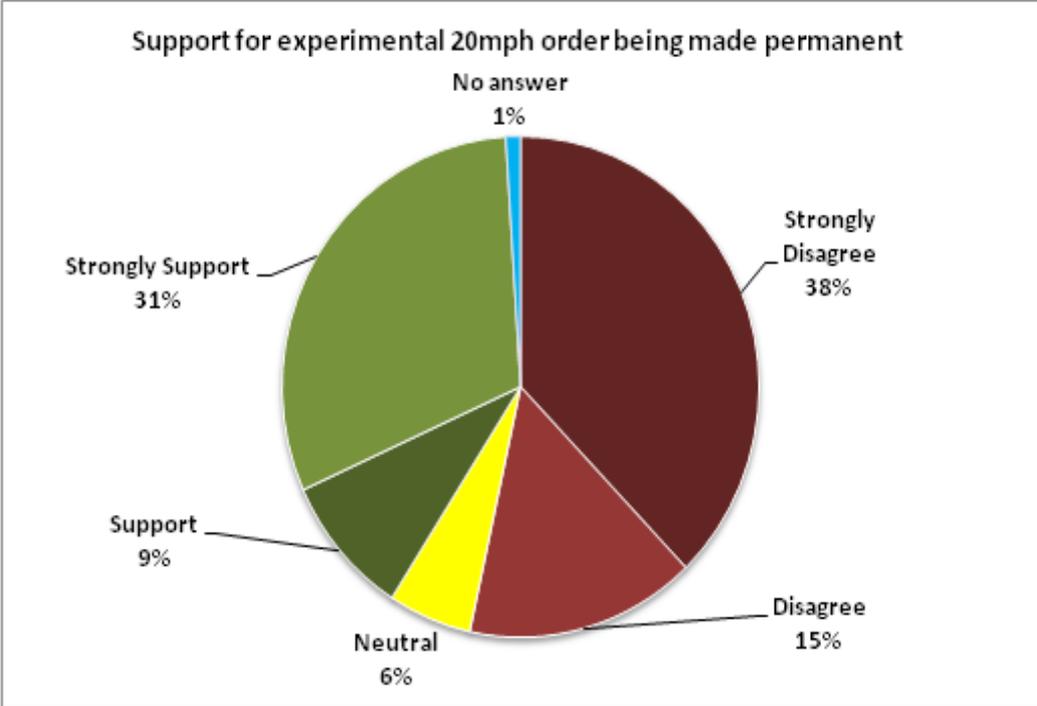


Figure 12 – Support for experimental order being made permanent

7.4 Question 4 asked if the following roads should be reverted back to a 30mph speed limit: Leamouth Road/ Roundabout, Cotton Street, Prestons Road (up to the blue bridge), Prestons Road Roundabout, West India Dock Road, Manchester Road/ Westferry Road and Cambridge Heath Road. The survey highlighted that the respondents felt that all of these locations should be reverted back to 30mph. Please see table below for results.

Figure 13 – LBTH roads to be returned to 30mph results

20mph limit?	Leamouth Roundabout/ Leamouth Road		Cotton Street		Prestons Road up to the blue bridge	
Yes	428	47%	426	47%	488	54%
No	255	28%	251	28%	220	24%
Don't Know	161	18%	167	18%	102	11%
No answer	60	7%	60	7%	94	10%

20mph limit?	Prestons Road Roundabout		West India Dock Road		Manchester Road /Westferry Road		Cambridge Heath Road	
Yes	435	48%	521	58%	511	57%	449	50%
No	281	31%	242	27%	289	32%	272	30%
Don't Know	113	13%	87	10%	71	8%	133	15%
No answer	75	8%	54	6%	33	4%	50	6%

7.5

A question was also asked to ascertain views associated with the proposal to introduce a 20mph limit on the following Transport for London Road Network (TLRN) roads: Commercial Road, Burdett Road, Mile End Road, Whitechapel Road, The Highway and Leman Street, also continuation of the existing 20mph limit on Commercial Street. The majority of respondents did not agree with these proposals and want the current limit to remain. Please see below table with the results.

Figure 14 – TLRN roads to become 20mph results

20mph limit?	Commercial Road		Burdett Road		Mile End Road		Whitechapel Road	
Yes	212	23%	221	24%	225	25%	234	26%
No	590	65%	557	62%	582	64%	568	63%
Don't Know	13	1%	79	9%	53	6%	54	6%
No answer	89	10%	47	5%	44	5%	48	5%

20mph limit?	The Highway		Leman Street		Commercial Street	
Yes	173	19%	232	26%	232	26%
No	599	66%	518	57%	518	57%
Don't Know	81	9%	103	11%	103	11%
No answer	51	6%	51	6%	51	6%

7.6

Question 4 asked respondents if they felt that more work was needed to increase the effectiveness of the 20mph limit. These responses have been ranked below in the order of popularity from the survey results:

1. Traffic Calming Measures
2. Police Enforcement
3. Driver Education
4. Driver Awareness

The table below sets out the results in three response categories for each question.

More work needed?	Agree		Disagree		Neutral/ No Answer	
	Count	Percentage	Count	Percentage	Count	Percentage
Increase in the number of traffic calming measures	381	42%	36	4%	158	17%
Increase in police enforcement	471	52%	289	32%	144	16%
Increase in driver education	517	57%	203	22%	184	20%
A driver awareness campaign to promote the limit	466	52%	273	30%	165	18%

Figure 15 – requests for additional measures to improve effectiveness of the 20mph limit.

7.7

Respondents were also provided with a section to provide further comment if desired. The following items were recorded as common comments made:

- Increased enforcement with tougher punishment (i.e. larger fines);
- There is still a problem with young 'boy racer' types and the Police need to stop this;
- Speed cameras need to be installed to monitor and deter drivers from travelling in excess of the speed limit;
- Additional traffic calming in some places if the roads remain 20mph such as:
 - Pedestrian crossings
 - Lane narrowing
 - Barricades at certain points (road closures)
 - Increased and larger signage
 - Speed humps

- Young driver education.

- 7.8 The survey results indicate that there is a general dislike of the new 20mph limit; indicating that the scheme is not widely accepted by the sample group analysed.
- 7.9 The heat map in Appendix E demonstrates that although there is a general dislike by the sample group; it can be seen that a large proportion of these respondents reside in the southernmost point of the Isle of Dogs. This area is home to a small number of properties in comparison to the rest of the borough.
- 7.10 525 responses were received from an E14 postcode which is the area covered by the Isle of Dogs, and equates to 58% of respondents. Of this, 146 responses were in support of the 20mph limit and 340 respondents disagreed with the experimental scheme. 39 responses were left either blank or remained neutral.
- 7.11 It should be noted that if these responses were removed from the survey results; then the scheme actually has majority support for the 20mph experimental scheme; with 143 responses against it and 218 in support of it.
- 7.12 The table below highlights that although there is a general dislike for the scheme from the survey results, when broken-down across the postcodes that form the borough; there is acceptance and support for the scheme in areas E1, E2 and E3. It is only in E14 where there is a general dislike and little support for the scheme.

	Support	Disagree	Blank/ Neither	Total
E1	81	72	11	164
E2	39	25	5	69
E3	73	29	3	105
E14	146	340	39	525
				863

Figure 16 – Postcode breakdown of survey responses.

8. AIR QUALITY

8.1 The Mayor for London is working hard to improve London's air through their '*Clearing the air*' initiative. The aim is for London to be one of the cleanest and greenest cities in the world. This will help ensure everyone who lives here can enjoy a great quality of life.

8.2 One of the initiatives that align with this scheme is investment in new facilities to make cycling safer and more enjoyable. The reduction in speed limits and introduction of new cycling measures encourage a modal shift which in turn aid in the improvement of air quality.

8.3 An air quality evaluation of the impacts of vehicle emissions of a 20mph speed restriction in central London has been undertaken by Imperial College London. The report details research work undertaken in the first quarter of 2013 to address the question of the environmental impacts of 20mph restrictions in Central London.

8.4 The primary data was collated through detailed vehicle assessment via high grade GPS and collection of NO_x (Nitrogen Oxide), PM₁₀ (Particulate Matter 10) and CO₂ (Carbon Dioxide) values. Six different routes across Central London were assessed in order to cover a range of Traffic Conditions.

8.5 The report found that:

- NO_x emission factors are higher for petrol vehicles over 20mph drive cycles compared to 30mph drive cycles; for diesel vehicles they are lower.
- PM₁₀ emission factors are lower for both petrol and diesel vehicles over 20mph drive cycles compared to 30mph drive cycles; the exception is vehicles with engines over 2.0 litres in size.
- CO₂ emission factors follow the same pattern as NO_x, although with smaller percentage changes, demonstrating increased fuel consumption when travelling at lower speeds.
- It is concluded that it would be incorrect to assume a 20mph speed restriction would be detrimental to ambient local air quality, as the effects on vehicle emissions are mixed.

The development of London-specific 20mph speed restrictions were shown to be mixed, with particular benefit seen for emissions of particulate matter and for diesel vehicles. The methodology was validated by consideration of real-world exhaust pipe emissions test data. It was therefore concluded that air quality is unlikely to be made worse as a result of 20mph speed limits on streets in London. This analysis is suitable for per-vehicle emission rates, and does not consider secondary effects such as congestion. A full copy of this report can be found at the below address for reference.
<https://www.cityoflondon.gov.uk/business/environmental-health/environmental-protection/air-quality/Documents/speed-restriction-air-quality-report-2013-for-web.pdf>

9. ANTI-SOCIAL BEHAVIOUR EVIDENCE

Overview

- 9.1 This section discusses instances of anti-social behaviour reported within the 20mph limit and comments on anecdotal evidence where provided. This can be used to identify the roads where motorists speed and/ or behave recklessly and to determine a strategy to deter this behaviour. At the time of writing any evidence of anti-social behaviour has yet to be supplied by the Metropolitan Police or the Council.
- 9.2 A number of community speed watch groups were created in 2015 by local councillors, concerned residents and Police officers, and have undertaken a number of events and enforcement activities to help reduce the number of vehicles travelling in excess of the speed limit. Involving the Councillors has allowed ward priorities to be a focus for these events such as ASB nuisance driving, vehicle speed and dangerous driving.
- 9.3 A recent event in March 2016 organised by the council, Metropolitan Police and public aimed to educate drivers travelling faster than the speed limit. Police officers stopped speeding drivers on Old Ford Road between Bonner Road and Approach Road to warn them of the dangers of speeding. Some of the worst offenders who were stopped were given warnings for their offences by the police and provided roadside education and training on the benefits and reasons behind a 20mph limit.
- 9.4 Approximately 80 drivers have been stopped and spoken to at events undertaken on Old Ford Road and Manchester Road. Events have been programmed to take place at Canary Wharf, Fairfield Road and Wick Lane this summer.
- 9.5 Two School Speed Awareness events have taken place, with others planned for after the summer break. The events with St Paul's with St Luke's Primary school on St Pauls Way and Manorfield Primary School on Zetland Street have both proved very successful and have been welcomed by staff, pupils and parents. Drivers stopped are grateful for the style of approach taken by police.
- 9.6 An event with the 'Safer Cycle Unit' and "Exchanging Places" programme, where cyclists get to sit in an HGV and experience the 'blind spots', took place on the 1st June 2016. 23 cyclists came through the Exchanging Places programme and 53 cyclists had their bikes registered with the Safer Cycle Unit.
- 9.7 All of these events have received a very positive response; been publicised on the MPS twitter account; and have received a positive social media response also.
- 9.8 The photographs below show some of the positive impacts these events are having on the local communities.



Photographs taken at events undertaken by the Community Speed watch groups

10. CONCLUSIONS

- 10.1 The purpose of this study was to assess the effectiveness of LBTH's borough wide 20mph speed limit and determine whether there was scope to make improvements. Based on the findings from the data analysis undertaken in Section's 4 and 5, this section discusses potential opportunities to effectively reduce vehicle speed throughout the borough. It also acknowledges that although the data supports that there have been no obvious negative impacts, there have been external stimuli that have affected these results such as the TfL's RMP and Cycle Superhighway which have had an effect on these results, causing a reduction in vehicle speeds and volumes.
- 10.2 The collision analysis identified that there has been a decrease in all casualty types other than 'slight' following the implementation of the 20mph speed limit. It would not be unreasonable to make the assumption that lower vehicle speeds have contributed to the reduction in the more serious casualty types and resulted in slight injuries due to reduced speeds, hence an increase in 'slight' casualties.
- 10.3 It is worth noting that a number of other London Boroughs have or are investigating the implementation of 20mph limits, including neighbouring Borough's: LB Hackney, LB Islington, City of London, LB Southwark, LB Greenwich. The only boroughs not looking into this at present are the LB Newham & LB Bromley. This is very important, as a high proportion of vehicles are making through/ cross boundary trips. This will create a driver behavioural change brought about by surrounding boroughs also supporting/ implementation of borough wide limits, and will aid in further reducing overall speeds and collisions within the Borough. TfL are also proposing experimental 20mph limits on TLRN routes. Please refer to Appendix C for a map produced in November 2014 depicting current and future 20mph limits in London by borough.
- 10.4 It is recommended that all roads proposed to return to 30mph are reverted back; as the nature of these roads and the classification of these roads is better suited to a 30mph speed limit. The number of collisions that are occurring on these roads has also not changed; the exception being Westferry Road; however this could be attributed to the reduction in vehicles that are using this route rather than a positive effect of the speed limit change.
- 10.5 The number of pedestrian casualties at junctions has decreased, which could be attributed to lower vehicle turning speed following the introduction of the 20mph speed limit. Collisions involving cyclists typically arise as a consequence of the cyclist being struck by a turning vehicle at a junction. The number of cyclist collisions has remained the same with an increase of approx. 1 collision. The number of pedestrian collisions has

decreased by 51% at junctions and increased by 51% on links. This suggests that despite a reduction in average vehicle speed, there may still be some instances of speed related collisions on some roads, there may also be other factors at play (i.e. space constraints) on a site by site basis and that physical intervention may be a mitigating solution. It may also point to the likelihood of increased walking and cycling as an activity, and encouraged by the lower speed limits on roads.

- 10.6 Analysing collision data on a road by road basis has indicated widely contrasting degrees of success in casualty reduction, with some roads achieving significant reductions, whilst some roads have recorded significant increases. This would suggest that the roads with a poor collision history could benefit from engineering measures, which would lower vehicle speeds throughout the local road network. However, the introduction of traffic engineering measures requires a holistic approach to ensure speeding traffic is not displaced onto neighbouring roads.
- 10.7 From an economic viewpoint, the costs associated with implementing the 20mph speed limit has brought benefits, and based on the analysis of 'after' casualty rates, the scheme has provided value for money.
- 10.8 Furthermore, a reduction in serious and fatal injuries has supported the safety benefits of introducing the scheme.

11. RECOMMENDATIONS

- 11.1 Following the findings of this study, this section makes recommendations for consideration of further works.
- 11.2 It is recommended that, based on the findings in this report that the 20mph limit scheme is retained due to the reasons outlined in the report; with the exception of roads previously listed to be reverted back to 30mph.
- 11.3 Despite the introduction of a borough wide 20mph speed limit, it would appear that there may be some issues with speeding vehicles on some of the roads in the borough. It is recommended that a further study is undertaken to determine the feasibility of introducing further traffic engineering measures within the existing zones to reinforce the message and create a wider behavioural shift.
- 11.4 The provision of traffic engineering measures on the local road network should be considered within an area, as opposed to individual basis, as this is likely to displace vehicle speeds onto neighbouring roads, as opposed to mitigating them.
- 11.5 If the scheme is not to be adopted it is recommended that the roads on the periphery of existing 20mph zones are prioritised and considered for a possible extension of a 20mph zone, as these roads may suffer from higher traffic speeds as vehicles wish to avoid the traffic calmed roads within the zones.

Quality

It is the policy of Project Centre to supply Services that meet or exceed our clients' expectations of Quality and Service. To this end, the Company's Quality Management System (QMS) has been structured to encompass all aspects of the Company's activities including such areas as Sales, Design and Client Service.

By adopting our QMS on all aspects of the Company, Project Centre aims to achieve the following objectives:

- Ensure a clear understanding of customer requirements;
- Ensure projects are completed to programme and within budget;
- Improve productivity by having consistent procedures;
- Increase flexibility of staff and systems through the adoption of a common approach to staff appraisal and training;
- Continually improve the standard of service we provide internally and externally;
- Achieve continuous and appropriate improvement in all aspects of the company;

Our Quality Management Manual is supported by detailed operational documentation. These relate to codes of practice, technical specifications, work instructions, Key Performance Indicators, and other relevant documentation to form a working set of documents governing the required work practices throughout the Company.

All employees are trained to understand and discharge their individual responsibilities to ensure the effective operation of the Quality Management System.



APPENDIX A – VEHICLE ANALYSIS FROM 2015 & 2016 SURVEYS

APPENDIX B – SAMPLE PERCEPTION SURVEY

APPENDIX C – CURRENT AND FUTURE 20MPH LIMITS IN LONDON BY BOROUGH

APPENDIX D – PERCEPTION SURVEY COMMENTS

APPENDIX E – PERCEPTION SURVEY HEATMAP

Accreditations



Memberships



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VEHICLE ANALYSIS FROM 2015 & 2016 SURVEYS

Site No	Street Name	85th%ile Average		Difference	Mean Average		Difference	Total Volume		Difference	ACPO Total		Difference
		2015	2016		2015	2016		2015	2016		2015	2016	
1	Alle Street	24.80	18.60	-6.20	20.00	15.30	-4.70	29170	32670	3500	193	358	165
2	Back Church Lane	22.55	21.60	-0.95	18.30	17.10	-1.20	86008	52953	-33055	277	4300	4023
3	Barnet Grove	17.20	16.30	-0.90	14.40	13.65	-0.75	65498	42613	-22885	28	253	225
4	Bazely Street	18.60	17.10	-1.50	15.10	18.35	3.25	31355	28513	-2842	18	2117	2099
5	Beachy Road	21.80	22.15	0.35	16.65	16.30	-0.35	7252	4490	-2762	40	448	408
7	Bow Common lane (110)	29.30	28.30	-1.00	24.25	23.65	-0.60	69374	87317	17943	2010	41494	39484
8	Bow Common lane (136)	24.20	24.40	0.20	19.95	20.45	0.50	117701	76406	-41295	602	13833	13231
12	Campbell Road	23.70	23.95	0.25	18.70	19.30	0.60	218247	46817	-171430	1436	7546	6110
13	Campbell Road	26.85	25.40	-1.45	22.30	21.15	-1.15	73724	68202	-5522	1146	16127	14981
14	Cannon Street Road	23.75	22.35	-1.40	18.85	17.00	-1.85	37415	98631	61216	237	9518	9281
15	Cannon Street Road	25.65	20.05	-5.60	20.35	15.75	-4.60	95013	131715	36702	1014	5222	4208
16	Canrobert Street	16.30	9.15	-7.15	13.50	7.50	-6.00	29936	17764	-12172	33	338	305
17	Cordeilia Street	18.45	19.70	1.25	15.50	16.35	0.85	142137	67917	-74220	115	1645	1530
18	Devons Rd	28.75	26.35	-2.40	22.55	20.95	-1.60	321263	251749	-69514	9263	74333	65070
19	East Ferry Road	33.60	26.70	-6.90	27.85	21.75	-6.10	121179	70715	-50464	12752	22740	9988
20	Ferry Street	19.90	19.60	-0.30	14.95	15.05	0.10	12793	7208	-5585	7	226	219
21	Gosset Street	23.95	23.15	-0.80	19.80	19.30	-0.50	168011	97901	-70110	25778	11591	-14187
22	Lowell Street	22.10	10.85	-11.25	18.10	8.65	-9.45	69179	47472	-21707	117	3022	2905
23	Monier Road	25.60	26.30	0.70	19.40	20.00	0.60	24568	12645	-11923	406	3208	2802
24	Narrow Street	21.15	20.80	-0.35	17.15	17.00	-0.15	112569	60295	-52274	108	3184	3076
25	Old Bethnal Green Road	22.00	19.20	-2.80	17.95	15.90	-2.05	157395	89586	-67809	911	2585	1674
26	Old Ford Road (110)	25.50	26.60	1.10	21.35	22.20	0.85	122862	129374	6512	1218	43247	42029
27	Old Ford Road (293)	26.80	25.40	-1.40	21.80	20.65	-1.15	255144	213803	-41341	3235	52609	49374
28	Parnell Road	30.20	28.40	-1.80	24.25	23.00	-1.25	125843	84777	-41066	5782	37356	31574
29	Poplar High Street	20.35	19.80	-0.55	16.85	16.35	-0.50	83449	44621	-38828	156	1725	1569
30	Poplar High Street	24.05	22.50	-1.55	18.70	18.05	-0.65	105796	55727	-50069	804	5239	4435
31	Redmans Road	22.80	19.70	-3.10	19.30	16.85	-2.45	63421	49625	-13796	264	1416	1152
33	Rhodeswell (109)	24.95	24.85	-0.10	21.55	21.55	0.00	234350	122678	-111672	585	27426	26841
34	St Pauls Way	24.85	24.05	-0.80	19.15	19.00	-0.15	126548	206030	79482	1037	32023	30986
35	St Pauls Way (37)	21.15	22.90	1.75	16.80	18.40	1.60	121257	202323	81066	174	22377	22203
36	Tarling Street	19.45	19.70	0.25	15.25	15.90	0.65	40187	28532	-11655	125	1184	1059
37	Vaughan Way	20.00	19.00	-1.00	16.40	15.70	-0.70	53514	53442	-72	34	1126	1092
38	Wapping High Street	25.05	23.95	-1.10	20.45	19.65	-0.80	80554	47830	-32724	667	7234	6567
39	Wapping Lane	21.80	20.95	-0.85	18.20	17.25	-0.95	68972	37121	-31851	75	1605	1530
40	Warner Place	23.05	20.00	-3.05	18.60	16.55	-2.05	119531	82784	-36747	515	3268	2753
41	Wentworth Street	16.20	15.80	-0.40	13.50	13.15	-0.35	80185	53660	-26525	9	185	176
42	White Horse Lane (60)	24.60	25.85	1.25	20.45	21.80	1.35	148449	116185	-32264	885	28158	27273
43	Abbott Road	25.85	19.80	-6.05	21.55	17.10	-4.45	178338	99503	-78835	1443	2239	796
44	Bethnal Green Road	25.75	24.20	-1.55	20.80	19.40	-1.40	188498	269359	80861	1460	42929	41469
45	Cable Street	28.40	13.65	-14.75	22.70	10.80	-11.90	38458	54239	15781	1266	17602	16336
46	Chrip Street	26.50	26.15	-0.35	22.40	22.20	-0.20	116037	95589	-20448	1474	29701	28227
48	Globe Road	25.40	25.35	-0.05	20.65	20.65	0.00	106710	117811	11101	1006	26787	25781
49	Grove Road	30.00	28.40	-1.60	23.60	22.90	-0.70	193170	225710	32540	7068	97195	90127
50	Hackney Road	27.05	26.40	-0.65	21.60	21.15	-0.45	319698	328424	8726	5059	98875	93816
51	Roman Road	30.65	27.75	-2.90	25.75	23.30	-2.45	234216	227944	-6272	9935	98877	88942
52	Vallance Road	24.05	23.30	-0.75	19.45	18.20	-1.25	171284	186208	14924	825	23310	22485
53	Westferry Road	30.30	28.10	-2.20	25.00	23.00	-2.00	172070	95548	-76522	6636	39118	32482
54	Manchester Road	28.65	29.00	0.35	24.65	24.10	-0.55	197979	111531	-86448	2258	57990	55732
Total		24.24	22.37	-1.88	19.72	18.32	-1.40	5736307	4733957	-1002350	110486	1024869	914403

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20mph limit review

The council would like your thoughts on the experimental 20mph speed limit enforced on borough roads.

Please complete the survey for a chance to win a £50 John Lewis shopping voucher.

The survey should only take five minutes to complete and all your answers are completely confidential.

The closing date is **20 June 2016**

1. What is your postcode?

2. Are you in favour of 20mph speed limits in general across London?

- Yes
- No
- Don't know

3. To what extent do you support the experimental 20mph limit on borough roads being made permanent?

- Strongly support
- Support
- Neutral
- Disagree
- Strongly disagree

4. Do you feel that any of the following roads should revert back to 30mph?

Leamouth roundabout/ Leamouth Road

- Yes
- No
- Don't know

Cotton Street

- Yes
- No
- Don't know

Prestons Road - up to the blue bridge

- Yes
- No
- Don't know

Prestons Road roundabout

- Yes
- No
- Don't know

West India Dock Road

- Yes
- No

Don't know
Manchester Road/Westferry Road

Yes

No

Don't know
Cambridge Heath Road

Yes

No

Don't know
Other (please specify)

5. Would you like 20mph limits introduced on any of the following Transport for London roads?

Commercial Road

Yes

No

Don't know

Burdett Road

Yes

No

Don't know

Mile End Road

Yes

No

Don't know

Whitechapel Road

Yes

No

Don't know

The Highway

The Highway

Yes

No

Don't know

Leman Street

Yes

No

Don't know

Continue the existing 20mph for Commercial Street

Yes

No

Don't know

Other (please specify)

6. Do you feel more work needs to be done on the following measures to increase effectiveness of the 20mph limit?

Increase in physical traffic calming measures

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

Increase in police enforcement

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

Increase in driver education

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

A driver awareness campaign to promote the limit

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree

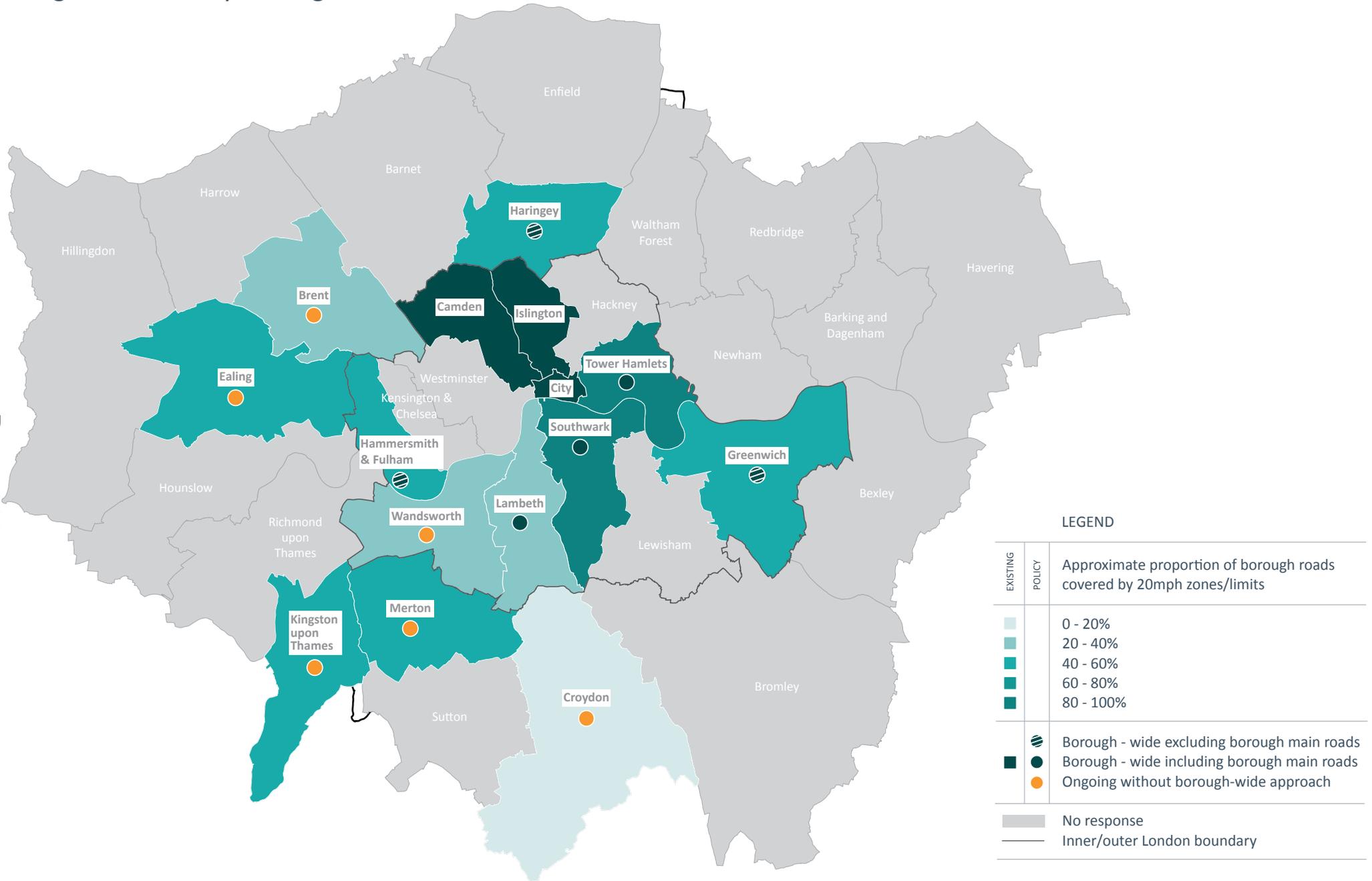
Other (please specify)

7. Please leave any further comments

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Figure 3.1 Current and Future 20MPH Coverage in London by Borough

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LBTH 20MPH LIMIT- PERCEPTION SURVEY COMMENTS	
1	The use of 20mph limits on wide roads (eg Prestons Road) is all but unenforceable. Safety is better served by road reengineering, physically separate cycle lanes such as the new lanes along Mile End Road
2	As a daily daily cyclist and parent (we also ride with our child in a child seat) 20mph is essential. Much more should be done - improved signage, proper traffic calming (rather than the 1970s rubber speed bumps) and enforcement. Attitude of drivers in TH is terrible and coupled with no enforcement, poor traffic calming, pathetic cycle infrastructure it makes for an unpleasant environment.
3	education is a waste of time. 20mph needs enforcement cameras and physical measures.
4	I understand education programmes have been shown to have no impact
5	It seems very rare to see drivers driving below 30mph, I have been (and have seen others) been threatened and beeped at for driving at the new speed limit.
6	Speed bumps and speed tables are often ineffective. They lower the average speed of a road while not lowering the maximum speed that cars reach. For some drivers, the presence of speed bumps causes them to exceed the speed limit in between them in order to maintain the speed limit on average. Others rush to overtake cyclists in the gaps then immediately slam on their brakes for the speed table. This is particularly bad in Narrow Street along CS3.
7	Involve schools and colleges in campaign to educate students and their families.
8	It would help if the council continued and stepped up encouraging residents to walk and cycle instead of driving.
9	When are you going to enforce the 20mph limit on Old Ford Road? I appreciate it crosses E2 and E3, thus two council wards but it is being used as a rat run. We need more permeated filterability throughout the borough. Look at the mini Holland in Waltham Forest. Car ownership is low in Tower Hamlets. It's time to put pedestrians, cyclists and public transport first. The council's cycle lanes are poor. We need segregated cycle lanes, not faded paint on the road.
10	Main roads should be 30mph, with suitable calming measures and pedestrian crossings where needed. All smaller residential roads should be 20mph, but parking and calming appropriate to the needs of buses, too many parked cars causes issues when buses come down some roads.
11	In general I think 20mph is too slow, it has encouraged reckless driving and speeding in ignorant drivers. I feel safe at 30mph on the Isle of Dogs, I am not sure why 20mph is necessary. I think it has had an adverse effect, particularly as it is not enforced. Cameras are not sufficient, there needs to be a police presence to enforce this or it has all been for nothing.
12	20mph is almost too slow and seems to increase the number of drivers being more reckless
13	The speed bumps on the Isle of Dogs damage my car because they are so high. The front bumper scrapes on them every time because my car is a sports car. It doesn't matter how slowly I take the bumps. They are too high. Too severe. They have also damaged my suspension.
14	20mph is increasingly dangerous. People spend more time looking at speedo and not road. Feel very unsafe when cycling. There are NO empirical data from the police that DEATHS are solely caused by speed (source FOI from Met, data from last decade)
15	20mph is trying to solve a problem that statistically does not exist.
16	20mph limits where they are not really required seem to make drivers more aggressive and increases the chance of accidents from dangerous driving.
17	30mph with physical calming measures. To deter boy racer in low rise fancy cars speeding. I have seen and witnessed more accident since the reduction came into force, with more people breaking the speed limit, driving carelessly and dangerous. Drivers have already been educated passing theory and driving test, the money would be better spent in returning roads to roads and kerbs to kerbs.
18	Help children learn the difference again between the roads and kerbs and not merging into the same
19	If we must have a 20mph limit then it needs to be enforced
20	I would recommend a proper traffic regulation for buses on the westferry road.
21	I have been driving for 50 years. even with the 20 mile an hour limit some drivers still done 50 plus. most drivers are ok driving its the odd ignorant few who make it bad for everyone else. 20 is too slow a speed .especially if the road is empty also you end up with a long line of cars which is frustrating. drivers should be allowed to use their common sense and anyone who dont get a heavy fine.
22	Just enforce the 30mph in the first place!!!!
23	I believe the 20mph limit increases congestion at rush hour and causes bus delays.
24	Have has so much road rage people don't stick to this limit also very dangerous as cars over take and accidents happen also cyclist and motorist should not be able to drive along same speed making driving harder and more accidents in rds
25	I am a safe driver but I feel that the 20mph speed limit is not safe. I am constantly being undertaken and overtaken by cyclists in the morning who have no regard for the speed limit or safety. Cyclists also choose to ride quite far away from the kerb and I cannot speed up to overtake them. In general I feel the limit frustrates some drivers and they drive at ridiculous speeds between cameras.
26	Slowing the traffic down takes people longer to get to their destination. We have had more accidents in Westferry Road since this has been introduced than ever before
27	As above, I have yet to see any enforcement of the 20mph trial limit, with most cars in see clearly breaching this. I would suggest 20mph is perhaps unrealistic anyway and a permanent 30mph limit suitable. However if it is not enforced I see very little point in the exercise.
28	I feel those of us that drove before observing the 30mph limit now stick to the 20mph limit. Those that drove at 50-60mph still do, the limit has not changed the menace drivers at all
29	20 mph limit is unnecessary has led to an increase in dangerous driving - tailing and overtaking those respecting the limit. It is now more stressful to drive than under the normal 30mph. 20mph is too low. But there should be more action against those who drive at high speed.
30	In my opinion, the 20mph limit has led to a significant increase in dangerous overtaking on Manchester Road and Marsh Wall. Have seen at least 10 instances of this in the last year and one before the change went into effect. This is very dangerous and poses a much bigger risk to cyclists, pedestrians and other drivers than a 30mph speed limit would (no known deaths in 2014 related to speed). Have seen many near accidents and strongly advocate returning to the 30mph limit for this reason.
31	20 Mph encourages overtaking. 30 Mph is about right. Should introduce strictures (not speed bumps) or more pedestrian crossings to slow things down
32	Overall, blanked 20Mph does not work on Isle of Dogs (in particular places like Prestons road)
33	The 20mph limit is actually dangerous. Pedestrians perceive cars no longer to be a danger so just walk out without looking and cars are driving so slowly they don't concentrate. It will lead to more accidents. 20mph is just too slow. There is possibly a case for very minor residential streets such as our own Moravian street, but that is the extent of it.
34	I agree somewhat with 20 mph in backstreets and small/narrow streets but on main roads it is just too slow, especially on the Isle of Dogs
35	There is no requirement for a 20mph limit, except outside schools. Driving at 20mph is inefficient and increases pollution, not just through engines being inefficient but also increasing transit time, adding to further pollution. That it is unenforceable makes a mockery of the 20mph limit. It's political point scoring, nothing else.
36	Nationally the speed limit is 30. Dropping to 20 has actually made the roads unsafe (I've been overtaken on the wrong side of the road, been tailgated flashed and sworn at...it's not solving the problem of safe drivers. Keep it at 30, keep speed cameras set to 30 and introduce more of a police presence with speed guns to catch those flouting the 30mph limit.
37	My experience of the 20mph limit has shown a marked increase in motorists, bikers, cyclists and pedestrians risking their own and other people's lives and limbs by walking out/pulling out into traffic, under the impression that the oncoming vehicle will stop. There has also been a lot of risky overtaking and obvious irritability at slow-moving traffic at certain junctions.
38	West ferry road has been noisy and dangerous since the speed limit has been introduced. Asian racers speed up and down all night long over taking law abiding citizens. Have known of 4 accidents on this road because of the speed restriction. Night buses ignore the speed restrictions along with all the Asian kids that treat this road like a race track (after inhaling balloons on the blaskers walk river front)
39	The 20mph limit is very dangerous. We already have enough to take our eyes and concentration from the roads: bus lane, cycle lane, no u-turns, etc and drivers not following the limit are very aggressive and overtake dangerously. Vehicles/pedestrians/cyclists make last minute decisions to cross the road because vehicles are going so slowly and put themselves in harm's way. It is very difficult to stay at a constant 20mph without stalling the car.
40	Bring the main roads back to 30mph, side roads down to 20mph. its really dangerous out there now as you have people walking across the streets and cyclists overtaking you.
41	The 20 mph limit on the main roads has led to increased traffic and speeding on the residential side roads.
42	Causes aggressiveness and dangerous overtaking. A threat to pedestrians and cyclists.
43	The 20 mile limit is a HAZARD for pedestrians at the highest now, I would say. As a driver, seeing the ripple effects of the road changes. The cycle lanes + 20mph limit = all users to act manic on the roads/crossing the roads.
44	The roads have never been as dangerous as they have been since the 20mph speed limit. In this day and age it is extremely slow on a main road. It is at greater risks to cyclists as drivers drive alongside them just to keep under the 20mph. Then you have a large amount of people during between 16-21mph who are not paying attention to the road but to the speedo instead.
45	Many vehicles do not follow the limit and become aggressive to those that do. Unsafe overtaking and pedestrians/cyclists taking chances crossing roads because vehicles are moving so slowly.
46	I find the 20mph to be more dangerous as when I am doing the limit I have been overtook on more than one occasion for doing the speed limit and was even on one occasion overtook by two cars which nearly caused a collision with traffic on the other side. I think the speed limit should go back to 30 and police should enforce this I live on Byng street and even there we have a problem with speeding drivers doing way more than 30mph
47	Since the 20 limit it has become more dangerous. It is too slow and everyone overtakes. I hate it!!!!
48	On the roads listed in 4 above it causes problems of bunching and cars are going at same speed as bikes which causes problems. Happy to keep 20 on minor/side roads. Little point in having the limit at 20 unless it is enforced.
49	Roads are dangerous with the 20mph speed limit. Impatient drivers overtaking and cyclist over taking vehicles. Speed cameras should work if they are there and not as a deterrent. Police need to be on the streets more with speed cameras. It works in Wales & the number of people speeding as reduced.
50	Some cyclist go faster than 20mph
51	Due to complete lack of enforcement there effectively is no 20mph limit. My street has been 20mph since many years before the latest initiative and is widely ignored. Enforcement and observance of the 20mph limit on Old Ford Road and Roman Road is non existent (as in the rest of the borough). Unless drivers are identified and properly sanctioned for breaking the limit, the whole initiative is a pointless waste of lives (motorcyclist recently killed in Roman Road) time and money.
52	If you decide to keep 20 mile in tower hamlets ,make sure cyclists keep to the limit as well as its a joke and take a road test and pay to use roads

50	Traffic rules need to be enforced for all vehicles on the road. I see infringements on a daily basis.
51	Limit is not needed. We already have traffic calming measures outside schools etc. It makes everybody irritable and the bad drivers will now unsafely overtake the good drivers who are doing 20, intimidating those who try to respect the limit.
52	n/a
53	More information would be nice - accident statistics, enforcement activity, etc.
54	I don't think the 20 mph has made any improvement to safety in fact made it worse . People tailgating you by cycles overtaking you and irresponsible people overtaking at speed . To mention a few
55	The 20mph trial has been a failure. It causes dangerous driving as people are frustrated by the new speed limit. Please put the limit back to 30mph and enforce the 30mph limit with all the methods listed in Question 6.
56	This ridiculously low speed limit encourages drivers to pay more attention to their speedometer than to the road ahead of them. This is dangerous.
57	The limit is ignored by most, and is not practical - better education about road safety has a greater effect on reducing accidents than putting in place ineffective lower speed limits.
58	The 20mph speed limit has caused problems on the Isle of Dogs. It has made it dangerous to drive walk and cycle as so many users get impatient at the slowness and so many not only ignore it, but exceed it by 2-3 times. I think 30mph is better. When there is traffic, people slow down naturally; when the road is clear people don't speed up as 30 is fast enough. If you want to increase police presence and enforcement, do so with people joy riding with impunity (ie young men, in my experience).
59	Finally cyclists won't be able to go 30mph and they'll stop overtaking cars, busses etc.
60	I drive and cycle. The reduced limits have made cycling feel much safer and I feel calmer while driving.
61	I haven't in truth noticed any reduction in speed on roads in the East End. 20mph is massively safer for pedestrians, wheelchair-users and cyclists but it's pointless to set these limits unless they're enforced. Please start to address the continued breaches!
62	Police enforcement should be targeted at those who race around the area at speeds of 50mph+ rather than those driving at 20-30mph.
63	The failure of the police to enforce the limit results in increasingly dangerous situations where speeding traffic dangerously overtakes those observing the limit.
64	20MPH along side streets and on housing estates is perfectly reasonable. Main roads should be about keeping the traffic flowing.
65	I think the main roads should be 30mph and minor spur roads and as the roads approach schools 20mph. The 20mph results in drivers getting irate, overtaking and putting pedestrians, cyclists and other drivers at risk. We all appreciate that there will always be the reckless, usually young male drivers, who totally disregard the speed limits but by and large 30 mph is a more realistic and acceptable speed.
66	What a skewed survey you are so clearly steering people to one final view. Open consultation - not.
67	20mph off main roads. 30 mph on main roads.
68	I think it's time that legislators and councils stopped introducing measures because of the idiotic actions of a minority. Soon you will have us all walking because of some stupid dangerous nutter getting behind a wheel.
69	I understand that there is a reason for a 20mph limit in many narrow roads near schools, but blanket 20 mph is totally ridiculous, especially on roads such as Cotton Street or Manchester Road - in some cases there are 4 lanes and just walls on the side - no people really. Common sense must be used otherwise all limits will be disregarded by people annoyed by incompetent people designing the rules
70	Make it 20mph by schools, hospital etc. I have no understanding why 20mph was painted in coldharbour when you can't do 20mph anyway.
71	I'm fine leaving it at 20mph if you only enforce over 30
72	The 20mph limit is way to slow 30 is good
73	I am a car-driver, and adhere to the 20mph limit (because I am a christian and wish to respect the law of the land, although I disagree strongly with the 20mph). My experience of adhering to the limit during the period it has been in force is that if anything it has made there loads MORE dangerous. 1) It takes much longer, and is more dangerous, to overtake cyclists (many are only just under 20mph - so they are slow enough that I reasonably want to move past them, but in order to do so whilst keeping to 20mph, I am forced to stay in the middle of the road for a longer period of time - this punts me, and the cyclist at risk for a longer period of time. 2) The fact that so many other people do not adhere to the limit means that I invoke aggression from other road users - honking, being overtaken at speed, tail-gating etc. I believe that for the period while these drivers are distracted by their frustration at my driving at 20mph, they are distracted from concentrating fully on their own driving/hazards around them. 3) It is ridiculous on some roads to be traveling at 20 mph when they are 2 (or in some cases 3-lanes) wide, with excellent visibility, wide pavements (and in some cases no residential entrances directly onto the road). Obvious examples are the stretch of West India Dock Road between the junction by Westferry and the junction with Burdett Road. Also Prestons Road/top of Manchester Road.
74	The 20mph limit 24/7 increase traffic and cause additional danger on roads when people speed up to overtake. Enforcing 30mph limit would be totally adequate.
75	The 20mph speed limit makes me feel very uncomfortable and scared when driving. I fear for my safety.
76	There is no proven safety benefit to the 20mph limit applying on general roads. So this is either a cash raising exercise by a bankrupt council or simply an unenforceable and wasted effort.
77	Unless proper action is taken to enforce the limit then there is no point to it. However, if this arbitrary limit is enforced then this will simply prove that the council do not care in the slightest about anything other than fleecing motorists.
78	There is some evidence that a 20mph limit should apply around schools during term time at the start and end of the day, but that is all.
79	I agree with the new speed limit on all residential/side roads but not main roads. I have myself been trying to stick to the new limit but the vast majority of drivers are completely ignoring it and still driving far too fast. My road for an example many of the vehicles must be doing 45-50mph.
80	Crack down on drivers who use their mobile phones
81	I find I concentrate on my speedometer rather than the road to ensure I keep below 20mph
82	20mph is too slow. Bikes are travelling faster. Buses are always over the limit.
83	Rather than reduce speed limits you should spend money adding road barriers to stop pedestrians walking onto roads in areas not designated for crossing. Also pedestrians need more road safety information. Putting barriers along the kerb will stop people - especially children being in the road and will reduce chances of pavement mounting by vehicles. 20mph limit is over zealous and punishes drivers for the poor judgement of pedestrians.
84	20m/h works for residential and smaller roads but do not help on larger busy roads.
85	The roads have become very dangerous since the reduction of speed limits. I am afraid to drive on the 20mph roads due to other aggressive drivers. I have since had to invest in a dash camera to help me feel safer on the roads. As a pedestrian I feel even more unsafe. Drivers are so busy looking at speedometers or driving at 50 and 60mph that they are not looking at pedestrians crossing the road. I have nearly being run over countless times.
86	There is no point having a 20mph zone because people still speed and also now drive very close in a threatening manner to those of us abiding to the speed limit, only to overtake aggressively and often dangerously. Either have a 20mph zone that is rigorously enforced or don't bother at the moment those of us that drove safely still do, and now at 20mph and the idiots still charge about
87	I support 20mph at certain times, ie school in and out. But it's ridiculous to have it 24 hours . Just makes criminals of normal law abiding people driving home at midnight on empty roads with no pedestrians.
88	20mph is ridiculous on major roads, they should be implemented on smaller estate roads, tiller road, pier Street, alpha Grove for example. But they are unnecessary and more hazardous on bigger main roads!
89	Think all major roads should be 30 & all side roads 20
90	I believe that the original 30 mph speed limit was fine and it helped traffic through tower hamlets. Now that it is 20 mph, there is a lot of traffic building up and I find I cannot get anywhere on time. It should stay 30 mph on bigger roads and main roads and maybe a 20 mph on side roads and residential areas where it would be more suitable.
91	If there was more police presence and they were issuing tickets for poor driving that could help. Also, have traffic cameras dispersed throughout the island could help.
92	If you want to ride a bicycle then you should have to pay some sort of road fee as the cyclists cause most of London's accidents and we are left with the damage to our cars because they don't know how to use the Highway code.
93	The issue seems to be that the speed limit is not enforced, no matter what it is we at. When it was 30 mph people went quicker and now it's 20 mph people still go quicker. It doesn't seem that the speed cameras work and so they are no deterrent to people. I have been overtaken a number of times when I'm obeying the speed limit. The speed limit of 30 mph would be OK as long as it was enforced properly. I think the speed limit is fine at 30 mph (maybe lower around schools) in this area, it's trying to get people to obey it that's the issue.
94	The 20mph speed limit is ridiculous. There are a lot of cyclists in the area and they are cycling faster than the cars!! All the limit has done is made our roads a nightmare. Cars over taking slow cars, tailgating, and a massive increase in road rage and aggressive drivers. 20mph speed limit is absurd
95	The money for this campaign would be better off spent policing the people that drive at 70mph not the law abiding citizens driving at 30!!
96	I do not think 20mph is useful in this area, my feeling is that it's the anti social element who drive well beyond 30mph that are the real problem, we need high profile policing not speed restrictions and speed cameras.
97	the 20mph ban is useless and very dangerous, please check the cctv cameras, and you will realise by yourself
98	I would like to see the trial of shared space street design on some of the wider roads.
99	30mph is more than enough on the roads. 20mph has made no difference in opinion in solving any problems . Instead it caused more congestion on roads. If 20mph was ok then it should apply to cyclist too as many do and are cape of going over 20mph as I cycle my self. Rather the cyclists should be educated to ride properly. Eg stop at red lights , stop at zebra crossing , signal when turning and overtaking , do ride in convey with another rider , make use of all cycle lanes and be on the main roads , they should be fined if they dont obey the rules like the motorists . Make then pay insurance to ride on the road.
100	It would be better to spend the time on improving traffic flow and road design rather than reducing to 20mph and making traffic angrier and worse... Suggest return to 30, time spent on improving flow of traffic, segregation, crossings and then enforce the 30
101	20mph limit on main roads is not required. Effort needs to be focused on drivers who often exceed 30mph (i.e. breaking the law) and endanger other drivers and pedestrians. Increasing the difference in speed between drivers by reducing the limit to 20mph only makes roads more dangerous.
102	Improve visibility for site roads by way of mirrors, lots of accident because of overtaking and unaware of traffic coming out of side roads, or traffics out of side route lack of visibility on main through road. Create proper and safer cycle lanes on the island to reduce traffic and less frustrations on the roads.
103	20mph near schools and zebra crossings with calming measures BUT A Blanket 20mph is more dangerous than a 30mph
104	I think that the 20 mph limit in tower hamlets is not effective and should be removed.

100	20mph limit on main roads is not required. Effort needs to be focused on drivers who often exceed 30mph (i.e. breaking the law) and endanger other drivers and pedestrians. Increasing the difference in speed between drivers by reducing the limit to 20mph only makes roads more dangerous.
101	20mph is dangerous and unnecessary. More should be done to catch and fine speeding drivers instead, i.e. 40-60mph+
102	The 20mph limit has in my opinion made driving more dangerous and stressful. An increase in physical speed calming measures such as speed humps would be a much better and alternative solution. These will physically force drivers to slow down in certain areas (near schools for instance) and provide the real results we all want. The 20mph limit has also encouraged aggressive drivers to overtake causing further danger on the road to both pedestrians and other drivers. Sensible drivers at 30mph are not the problem, the ones speeding along at 40+mph however are dangerous and due to this I strongly disagree with the 20mph speed limit and I think it should be scrapped.
103	Any 20mph speed limit needs to be enforced by the police or it is pointless. It does not currently appear to be enforced. Police or speed camera enforcement is a cheaper option than physical traffic calming measures.
104	20mph is dangerous and unnecessary. More should be done to catch and fine speeding drivers instead, i.e. 40-60mph+
105	Main problems I encounter are young drivers usually in blacked out BMW's and the like driving well over the limit. Reducing the speed limit to 20mph has not deterred them.
106	The 20mph limit also makes it difficult to over-take cyclists safely especially on narrow roads.
107	I live in the Steyne area and the speed some people drive is disgusting, when you are on the zebra crossing they race on the opposite side of the road. They also speed along the roads around the corners.
108	I reckon the 20 mph speed limits are ridiculous around London. It poses a threat to everyone as well as cyclists. Cyclists ride way above 20 undertaking cars which is life threatening. It needs to stay at 30! Everybody thinks it is alright to cross roads seeing cars going slow and puts drivers at risk more often. And many more Remove cycle lanes as cyclists don't use them enough and this causes tax paying drivers inconvenience.
109	Cyclists are the bigger danger on road. No need to change speed limits
110	I feel that the 20 mph speed limits across the Isle of Dogs has created very dangerous driving conditions and has not increased safety in the roads. There are many cyclists on the island, both locals and people coming from south of the river, which ride at about 20mph but slower on the hillside corners, with cars able to drive at a more steady speed this creates difficult breaking situations and difficulties in overtaking bikes as everyone is at similar speeds. When cars can go that little bit faster bike and cars are no longer on top of each other getting in the way. There is also issues with buses and bikes overtaking, though in my opinion there is an issue on the island with speeding buses and bikes regardless of the speed limit.
111	Secondly the reduced speed limit has encouraged 'racers' on the island to overtake in quiet residential streets. This very rarely happened before the speed limit change and I have seen many near accidents because of this overtaking and complete disregard of the speed limit.
112	Cyclists going faster than cars is dangerous, 20 has not worked on Isle of Dogs
113	The 20mph limit is a terrible policy. It wastes my time for no benefit. I obey the limit and then usually have an angry driver who wishes to go 30 driving to close to me because they are frustrated. In September last year, this caused a fender bender crash on the approach to the blue bridge round about as I stopped at the queue of cars waiting to use the roundabout.
114	Additionally traffic is not able to cleanly pass cyclists easily. This morning driving along Manchester Road, I passed a cyclist and continued at 20mph slowly pulling away. The car behind me was too impatient to wait (already frustrated at following me at 20mph), so tried to overtake the cyclist, but did not have room to pull in between the cyclist and my car. She therefore drove next to the cyclist for about 100 yards including being alongside the cyclist as they went over a zebra crossing where the road narrowed - how the cyclist did not get hit, I shall never know.
115	The 20mph limit is a f***ing joke! My gran walks faster than this! Cyclists are overtaking vehicles and 20mph leads to more tailgating! Whoever the f*** is trying to implement this change, must love getting bummed! Stupid rule! You think 20mph will be followed? Piss off!
116	Enforcing 30mph would be useful. 30mph is not the problem. The problem is the drivers that do over 40mph (on e.g Manchester Rd) and that hasn't changed a bit since the introduction of the 20mph speed limit.
117	The 20 mph is ineffective and a bad idea. It is doing more harm than good. I am strongly in favour of reverting back to 30 mph speed limit. There will be less frustration on the roads all round, achieving calmer traffic and safer roads in return.
118	It is ludicrously slow especially at night.
119	Better communication, maybe statistics to explain 20mph limit and some further measures e.g. cameras in some critical spots such as bend between blyth close and seysell street near E143DX where drivers speed up quite a lot and people cross the road quite frequently in direction to and from the Mudchute park because zebra crossing is not as close by.
120	The problem lies with inexperienced young uninsured drivers within the E14 area
121	The 20mph limit seems to increase danger to pedestrians by making them complacent crossing roads, while creating frustration among drivers. I know of no one who wanted the lower limit in the first place, or welcomes it now.
122	It is difficult to drive consistently at 20Mph as it is in between gears. 30Mph makes more sense, but having ways of slowing the traffic for those who speed down certain streets (such as Limeharbour to East Ferry Road) would help deter those who are still breaking the 30Mph.
123	A 20mph limit on such roads is ludicrously slow. 30mph is a much more reasonable and effective limit for the nature of these roads.
124	I don't think the roads have become any safer with the new limit. Also it a waste of public money trying to enforce it.
125	The 20 mph speed limit makes driving really difficult as I have to drive in third gear the whole time and spend more time watching the speedo than watching the road. 25 mph would have been fine but 20 is ridiculous. I also believe its probably no good for the environment. I don't understand the reasoning behind it.
126	I don't think the 20mph limit has reduced accidents. The new cycle lane has created more accidents.
127	The 20 mph limit is dangerous - traffic is even worse at this low speed and law abiding citizens who drive at this speed are voraciously overtaken by speedsters. The 30 mph limit seem to keep drivers driving at that speed and the traffic flowing better.
128	How are changes going to be enforced? Cameras may have some effect but most importantly there should be more police presence. Eg, Boy racers, drivers on mobiles seem to be in control of the roads around Cable St which already has ineffective traffic calming measures so any other borough-wide changes need to be enforced rigorously.
129	Generally I don't think 20mph is appropriate for most roads with bus routes on them.
130	I'm all for 20mph speed limits where passing school but 20mph is not fuel efficient for cars, therefore more pollutants being put into the air. It also does not seem to apply to cyclists (but then does any road law) who do not get flashed by speed cameras and the current state of the roads force drivers to slow to between 20-30mph already.
131	If this was experimental, why has the actual legal road signage for the 20mph speed limit already been put up? It seems to me that regardless of this survey, it will be permanent.
132	Should you wish to discuss any of what I have mentioned above, my email address is cwl1974@gmail.com
133	Regards
134	Mr Chris Lucas
135	I have seen no evidence of police enforcement, nor heard of anyone being in trouble for going too fast, although there are lots of cars that totally ignore the limit and speed dangerously along Devons Road. Rules need teeth.
136	This 20mph makes drivers overtake more and cause danger in our roads, you should make it back to 30mph, so much danger on 20mph.
137	In my experience, the 20mph limits have made the roads more dangerous for drivers, cyclists and even pedestrians
138	The roads in E14 are generally too narrow to handle a higher speed limit. Higher speed limits just encourage drivers to exceed them, creating danger for both other drivers and pedestrians.
139	20 mph limit should apply where there are vulnerable pedestrians, i.e. junior schools. Not across the whole of the borough, no matter what the road conditions are.
140	I don't see anyone keeping to the 20mph limit on those roads listed above, and on such busy roads why limit it to 20? It makes people late and in turn they drive faster to get past the slower cars
141	The 20 mph limit is ridiculous and unnecessary. It causes tailbacks and encourages dangerous overtaking of vehicles that obey the limit. Even buses ignore the limit.
142	It would be useful to have time-dependent speed limits in places. I would happily abide by 20mph limits along Manchester Road during the school run, but if I'm giving someone a lift home at night time I would resent having to go slowly all that way.
143	There needs to be speed cameras implementation if anyone is to stick to 20mph as no more than 10% of driver's actually bother with the speed unless it's monitored with camera's.
144	30 miles per hour with the above enforcements would be a great idea.
145	I personally believe that 30mph is a safe driving speed. However, I would comply with 20mph should it be made permanent. I believe a 20mph limit should be enforced during school opening and closing.
146	Since enforcement by police seems non-existent on the Isle of Dogs, education and other physical traffic calming measures should be more prominent. If 20mph were to be enforced then it is vital that local driver education campaigns are delivered. I often find myself overtaken and there seems to be no punishment for
147	recidivist behaviour causing average speeds to be much higher than the mooted 20mph.
148	Introduce cameras on Manchester Road.
149	I see very little evidence of enforcement on Violet Road / Morris Road.
150	20mph on main roads is ridiculous. Yes on smaller roads (thermopylae gate, tiller road etc) of course 20mph, but westferry road and Manchester Road? Absurd. Worst waste of money I've seen used by tower Hamlets, not happy.
151	20mph is not efficient in fuel consumption and creates unnecessary pollution.
152	Agree there should be speed camera enforcing 20mph around school area.
153	I usually tend to stick to the 20mph speed limit in Docklands. However, there is always someone tailgating me or over taking me at bends or whenever possible to pass me whenever doing the 20mph. It is more dangerous when cars always over take the ones sticking to the speed limit. There are lots of children and
154	people generally crossing the streets and these speedsters don't seem to realise the consequences of their dangerous driving.
155	30mph is good
156	My family and I live on Prestons Road, near the big roundabout. There are still too many drivers speeding (often at speeds between 40mph-60mph, despite the big 20mph signs on the road). It is unsafe for my family and young toddler. This is now a residential area and priority should be given to pedestrians rather than
157	poorly behaving and impatient drivers. Please can you install speed cameras on Prestons Road just after the large roundabout to deter this dangerous behaviour? I've lived here for 5 years and have seen many, many accidents over the years.
158	Adding speed cameras and traffic calming would be more effective than imposing a speed limit. Boy racers in their high performance cars/motor bikes will never stick to the limit.

147	On the face of it 20mph sounds like a good idea but it has resulted in some extremely dangerous driving as people are frustrated. Please revert back to 30.
148	20 mph should not be used on main roads (like Westferry Road and Manchester Road) but on side streets. The problem is with poor enforcement of 30mph and parking spaces too close to crossroads blocking the view of cars entering main roads from side streets (like Napier Avenue into Westferry Road) and not with speeding cars.
149	Sadly most drivers (including D7 bus drivers) appear to go over the speed limit on Prestons Road.
150	I live beside The Highway and the speed limit is just not observed. There seems to be no control on speeding vehicles and most of the motorbikes exceed the speed limit and, I imagine, exceed the noise levels.
151	This 20mph measure is causing more ASB towards pedestrians and cyclist, therefore I strongly agree it should return to 30 mph
152	A reduction in sign clutter would be good.
153	As a driver, it is difficult/almost impossible to overtake safely a cycle. As a pedestrian, I have noticed that cars who drive slowly at 20 mph sometimes don't stop at crossings because they are already going so slow that they don't want to stop and wait, making their journey even longer in time. I believe that if 30mph would be in use and enforced, we would not need to have 20mph limits.
154	The biggest problem is the increased danger to pedestrians and cyclists speaking as car driver. I'm happy to drive at 20mph on the Island. I have been overtaken by cars when I'm doing 20 to 25 several times . Once they went on the wrong side of the road past two bollards nearly taking out a cyclist. I have the video of this .
155	In the south of the borough the 20mph limit has been a failure. In the absence of major monitoring (which would be expensive and unnecessary) it has led to some drivers following the limit and others, where they can, dangerously overtaking those following the limit, sometimes near blind bends and corners. This approach is borne of frustration. On the Isle of Dogs, which is a quiet residential area with little traffic, 30mph is a perfectly safe speed. The 20mph limit on the other hand is going to get someone killed through stupid overtaking. The road to hell once more being paved with good intentions (if something implemented by Lutfur Rahman can actually be said to have good intent).
156	An unenforced 20 limit is worse than an enforced 30 limit, as some people adhere and some don't, and the difference in speeds is dangerous. It should only be 20 if its enforceable.
157	I think 20mph is too low. My answers above are based on my belief that the limit should be 25mph. With 20mph I have to use lower gears and therefore I am increasing pollution levels. 25 mph would enable me to use higher gears. Buses, police cars etc are all doing 25mph except when they come to the cameras. Also bikes are going over 20mph but would find it difficult to go over 25mph.
158	If 20 mph is kept, then need more traffic calming measures and awareness but not police enforcement. I prefer going back to 30 mph on main roads but put in traffic calming measures to reduce speeding. Current 20 mph on main roads is just ignored, it's annoying when there is little traffic, and irrelevant when its busy as you can't even go that speed.
159	The 20mph speed is completely ineffective at reducing dangerous driving, those who drive dangerously simply ignore it. All it has achieved is slowing journey times for everyone.
160	Traffic calming will increase noise and air pollution and do nothing to increase safety. Keep 20mph limits for quiet residential roads, not major thoroughfares
161	Grade-separated and segregated cycle tracks would make it OK to increase the speed limit again. Where bicycles must share the road with motor vehicles then 20mph should be the limit.
162	30mph is a good limit for all of Tower Hamlets as long as it is backed up by ACTIVE police prosecution of dangerous driving. We all know that you can safely drive at 30mph on the 20mph-limited roads when they are quiet, which makes a mockery of the 20mph limit. We also all know doing 20mph on some of them when schools are closing etc is far too fast. Speed limits don't solve the problem of dangerous driving, which ALL of Tower Hamlets is suffering from.
163	The 20mph limit is only followed by those that didn't previously exceed the 30mph limit. The reckless speeders continue to ignore limits and are now more dangerous as a result of frequent overtaking of 20mph traffic. The 20mph is also exceeded by many cyclists! I have found the limit to be more dangerous as a result of those who ignore it and overtake me, and the challenge of negotiating overtaking the many cyclists whose speeds vary dramatically between 10-25mph.
164	A lot of roads are already 20mph, however there are no physical traffic calming measures nor any police controls. Example: Millharbour, a straight road where people always speed...
165	A lot of roads are already 20mph, however there are no physical traffic calming measures nor any police controls. Example: Millharbour, a straight road where people always speed...
166	I find that the 20mph limit causes more dangerous situations than it prevents. Simple enforcement of the 30mph limit would be safer and more likely to target the real dangerous drivers instead of those who drive safely by adjusting their speed according to the risks that present themselves in each situation.
167	There were specific areas on the Isle of Dogs e.g. southern end of Eastferry Road which already had a 20mph limit for very good reasons and which were generally well observed. A blanket ban, covering wide, sometimes dual carriageway roads brings the idea into disrepute and discourages adherence in those places where it really is important. Even this survey falls into the trap. Westferry Road and Manchester Road are lumped together, but in fact they are very different. Manchester Road is wider, has no problem with parked cars and absolutely does not need a 20mph limit, whereas there is a case for parts of Westferry Road. The council and the police should be targeting the few who drive at 40mph+, not the vast majority who are safe and aware at 30mph. And why not school zones like in America?
168	The 20mph has increased the number of reckless driver actions, as drivers (usually younger drivers) over take cars adhering to the 20mph limit. The 20mph limit makes it difficult to the point of dangerous when trying to negotiate cyclists, as they are often travelling at speeds of around 18-19 mph. I don't understand that if you cannot enforce a reasonable speed limit of 30mph, how you expect to enforce one of 20mph. I agree of a speed limit of 20mph on smaller estate roads where there are likely to be children playing, but the roads this limits have been introduced on are main roads.
169	Need more speed cameras for 30mph limit, 20mph is too slow.
170	I do not think the 20MPH limitation is the answer to road safety in the Borough. I regret I do not have the answer, but I have witnessed terrible driving actions which I can not help but feel have been caused by the frustration of the limitation - driving on the wrong side of keep left signs to over take, over taking queuing traffic at temporary traffic lights or because people were queuing patiently to allow someone to parallel park and simply general, but extreme, excess speeding. We have also had a number of nasty accidents in the last few months, all caused by excess speed. Maybe you should invest your time in educating cyclist and not drivers
171	I have had many near misses with cyclist not stopping at zebra crossing and running me over in the foot tunnel.
172	West ferry road is my main route and I see that a lot of people over take those going at 20 which is very dangerous when there are so many parked cars and buses. Unfortunately this seems to do more harm than good and makes it very dubious to cross roads as you have to look behind all cars. Not enough people follow the speed limit, either have it an increase the enforcement significantly or don't have it at all. There are no speed cameras in place to enforce the limit.
173	Tower Hamlets has the lowest car ownership of any borough. Frequently the majority of the population is needlessly put at risk due to the inconsiderate and dangerous driving by a small minority. The pollution create by drivers is responsible, according to Kings College, for the deaths of 26 Londoners a day, it has the biggest effect on the most vulnerable, the young and old. Reducing the speed will help cut pollution levels, more needs to be done to get people out of cars. Speeding is rife within the borough, I am, regularly overtaken if I drive my car, van or cycle at 20mph. Last year a driver crashed their Porche into the front of a house, (thankfully the resident was in the kitchen avoiding injury), on the junction of Jubilee St and Redmans Rd. A few days ago a driver turned his car over near Limehouse, yesterday I witnesses a near miss as a one driver overtook another on Jubilee St narrowly missing a scooter travelling on the opposite side of the road. The driving outside my daughters school, Smithy St, is appalling. A family were crashed into on the pavement and there are regular near misses on the zebra crossing along with speeding, double parking, in appropriate 3 point turns & other dangerous driving by the tiny minority of parents that drive their children to school.
174	There needs to be a step change to make the borough safe for the very larg majority of residents that don't drive. Has anyone thought of maybe a 25 mph that slight increSe would make such a difference, in this busy time we all live 20mph is just a bit too slow we can be over taken by bicycles.
175	Not a user friendly survey. Very difficult to make selections.
176	There is a real problem that cyclists do not respect the limit and over take cars which is extremely dangerous.
177	Mastmaker Road, Byng Street and Lighterman's road should all be one way
178	20mph speed should be taken off because it's creating too much traffic everywhere. Should go back to 30mph ASAP and who ever gave those ideas for road works and the systems on the road this guy is a uneducated guy got no brain used to be much better the way it was before
179	I do not believe that 20mph speed limits should be in force on any road that is not a side road/residential road. (1) It causes too much congestion and (2) it is likely to cause many accidents as when driving at 20mph I have been undertaken by cyclists
180	If the goal is to make roads safer, I think more time ans effort should be spent on educating drivers and making them aware of all types of road users. Many previous experiences prove that speed limit is not the adequate answer unless the council starts adding speed cameras everywhere. 30mph is the adequate limit for most roads and I hope to see more educational campaigns on road safety.
181	I strongly disagree with the 20mph for several reasons . But firstly I really think your survey disproportionately slanted towards keeping this 20mph limit. It is widely disliked... my reasons for not having it. Prior to this experiment there was little or no enforcement of the previous 30mph limit. There were often drivers dining in excess of 40 and 50mph. And I believe there more drivers doing those speeds with now 20mph.. The 20mph limit is causing more drive frustration between those that try and staying within the new speed limit and those that don't. 20mph.. is a difficult speed to maintain in a manual car. It is neither comfortable or smooth at this speed in eit herend or 3rd gear.. 20mph would be a better speed limit.... but only on side rds, residential rds. Its nonsense have anything lower than 30mph oN any main through rd. I believe the 20MPH SHOULD BE SCRAPPED AS SOON AS POSSIBLE... IT'S STILL A RIDICULOUS SLOW SPEED to try travel across a city the extent of London!.. perhaps it's would be appropriate in city the size of Bath or Chester... but London. I think the planners are simply NUTS to introduce this IN such huge city . You might as well ban all motor vehicles from all london streets...but you can't do that... There many reasons why a significant proportion of population need a are at sometime or another.

	Could you please install speed cameras on Glamis Road close to the junction with the Highway, also speed camera in needed on a T-junction with Wapping Wall and Garnett Street. Cars get off the Highway onto Glamis Road and drive above 20mph limit on Wapping Wall (cobble street and protected zone!) and speed into the Garnett Street (there is a school there!). Also speed cameras are needed on a stretch of Wapping High Street close to the Wapping station - drivers think that it is racing course, especially in the mornings and evenings. There is no suitable crossing between Wapping Wall and we have to cross the street in unmarked places. Good job was done by Peter Allnutt and Wapping residents to keep Redwing and other tour busses from using Wapping roads as a shortcut to avoid The Highway traffic - needs to be enforced more, because some busses still stray in. Also some sort of enforcement needed to stop trucks (that do not deliver in Wapping) using Wapping as a shortcut - on many occasions they block Wapping Wall and D3 or other cars cannot get through, also it is impossible for residents to get out of underground parking spaces. The bridge on Glamis Road has no sign of the weight limit - needs to be put back. Thank you
182	Speed cameras added eg on Manchester Road
183	It would be useful to make this an evidence-based policy - has any evaluation been conducted on the impact the 20mph limit has had on road traffic accidents, air pollution, congestion etc? I would be keen to see this.
184	Is not being policed and the wrath of other drivers is experienced when you do try to keep to 20mph
185	Leave the roads alone.
186	LBTH must be commended for trialing the new 20mph speed limit, as research in any sphere of business or industry breeds innovation. However a 20mph speed limit on any road must be reasonable and proportionate to the road layout, adjacent building (and use) and accident history. Taking Westferry Road and Manchester Road as a key example, there has over the years been incidents that fully justify the placement of cameras, road humps in black spots/near schools etc. These traffic calming measures are fully acceptable and justified. But on the whole of the A-road, the only which circumnavigates the Isle of Dogs, it is totally impractical and unjustified implementing a 20 mph speed limit. Traffic is not calmed, it is frustrated. Drivers are not observing the speed limit, they are risk taking because the ordinary man on the street would see that for the most part Westferry road/Manchester Road is wide, the streets are well lit and crossing points are numerous. As local residents, we are in favour of 20mph limits on narrow, pure residential streets, but not on main A roads where there is high traffic density and good road infrastructure. My wish, and that of other residents I know, is for the 20mph limit to be rescinded on the main A roads across the borough. Best regards
187	I have witnessed that 99% of people during this period have not observed the 20mph limit. The 30mph seemed to work perfectly fine before.
188	Strongly disagree with 20mph limit as the little cars with cameras are there to make money with fines and 20mph is too slow when it is school run and going to work
189	this does not make road safer
190	The 20mph speed limit make me so focussed on my speedometer that i don't focus enough on the road. The roads don't allow me to go fast, but i also don't want a ticket. I'm a safe driver and i don't think the people that speed pay attention to the 20mph limit anyway.
191	This 20mph is not needed. People judge when they drive and will reduce speed accordingly. Authorities should go after the reckless drivers and punish them. Also put barriers in Whitechapel Road as before because people are crossing while cars are speeding towards them.
192	You would be lucky to be able to get up to the speed of 20mph on many of these roads most of the time. The initiative to have a maximum speed limit of 20mph causes congestion and increased emission levels.
193	Cars overtaking those doing 20mph even saw a bus outside my house overtaking a learner going the opposite side of a stop half way zebra crossing by a school
194	20mph limit is good in my view, especially as in practice people creep up to around 30mph...whereas when it was a 30mph limit people would seem to creep up to around 40 (especially on Manchester Road). Sadly doesn't stop some people driving at double + the limit and the number serious incidents on the 20mph and
195	30mph roads is really rather shocking. More awareness training for poor and reckless drivers may help a little. Traffic calming probably more.
	Speed limit without enforcement is pointless to those who regularly break the rules, which I believe is the main source of problem. I have seen many sports cars driving past the Highway at a very fast speed and loud noise at night, I wonder if they are being caught. Some cars have very loud sound when starting the engine, this should be controlled especially at night. Pennington street for instance, has a speed limit but no drivers drive within the limit, because they are annoyed by the traffic jam on the Highway and use Pennington street to avoid the traffic for a bit. Big trucks often pass by at a speed obviously over the limit. It often shakes the ground as well. Such back streets should be monitored by cameras. Many illegitimate street parkings and litterings on Pennington street everyday, which I have never seen being controlled by the local authority.
196	I strongly support a 20 mph limit all over Tower Hamlets. Even in areas where traffic rarely goes above that speed due to congestion it would nonetheless enable streets to be designed in a more human-friendly manner.
197	However, the speed limit does need both rigorous enforcement, and changes to road design to encourage slower speeds. In particular I would like to see modal filtering on back streets to prevent them from being used as through routes.
198	No one abides by the 20 mph rule and it causes more traffic
199	20 mph is too slow, just stop the ppl going who go over 40mph
200	maintaining speed limit is very important to reduce the percentage of accident.
201	This decrease in traffic speed has been terrible and has made my bus journeys take much longer.
	it seems about 90% of all drivers use their phone while driving at some point during their journey on the car. You can just stand on the pavement and see how many are talking on the phone while driving or even worse texting. Its been proven that it lowers the drivers awareness when driving. Yet they never get pulled up by the police, they should be given instant fines and eventual lose of licence.
202	Also cyclist late at night cycling with no lights. Again police don't care and never stop them. They need a light mandatory at the back and front of bike.
203	20MPH limits are appropriate on residential side streets but not on the main through streets
204	The research and wisdom behind the 20mph limits is entirely unconvincing at its root
205	Reduce cyclist highways, get cyclist to pay road tax, and be insured
	The 20mph limit is very hard to leave an opinion on as very few people have been adhering to it. The raised speed hump outside my hump is not enough to even make people slow down and as such people are driving over it at high speeds causing damage to brickwork. The speed BUMPS are just causing people to slow down just before and therefore cause potential traffic problems with sudden braking. Enforcement has been nil. Around schools I agree with it. I would like to petition that the raised area outside the equinox supermarket be removed as it does nothing but cause damage to the surrounding houses and the buses cause noise pollution when they are going down the gears and the engine 'screams' in protest. Also the noise of cars accelerating quickly as soon as they have gone over them is load - especially at night.
206	It is unnatural to drive that slow in many wide and spacious roads and causes the build up of traffic and harm to the environment.
207	At the moment people that are abiding the 20mph limit on westferry road are being overtaken by people speeding going well above the old 30mph limit. I have been nearly knocked down in several crossings most frequently the ones by harbinger and st edmund's schools by people who are either speeding and don't have time to slow down and stop while I'm halfway in the crossing or just don't seem to think the rule applies to them just as I've stepped on to the crossing.
208	We have had many years of road safety advertisements informing that 30MPH is safe, so why now 20MPH, will it be 10MPH next?
209	20 mph is a ridiculous speed and dangerous when others try to overtake, refusing to stick to the limit. This happened to me when I was close to a zebra crossing and a bad accident could have happened if anyone was crossing at the time.
210	Due to the cycle lanes Tower Hamlets is already at a standstill, enforcing further speed restrictions will make life a absolute misery.
211	The 20mph speed limit does not work. In fact it's a contributor accidents as most people are used to driving at 30mph. So most disobey it anyway and those who follow 20mph actually do 17-19mph causing a hazard. Especially cyclists go faster than cars. It's impractical and hazardous. Reset all 20mph roads back to 30mph and concentrate on making roads wider and marked better. Instead of makeshift bent lines and increasing pavements causing congestion. Thank you.
212	The new 20mph limit is a disaster. It has led to aggressive driving, dangerous overtaking and is a wholly unsuitable limit on the main arterial roads, esp Manchester Rd and Westferry Rd. As a pedestrian it is much harder to cross the road as cars are on the road for 50% longer, also increasing pollution. Please revert to 30mph and actually enforce on those who have a blatant disregard of the limit.
213	As said 20mph speed limit causes accidents and is dangerous for cyclists. And car pollution is increased at lower speeds.
214	The speeds are better controlled through humps and physical calming. Most drivers find the 20 limit difficult to keep as it is easy to go too fast very quickly. There's a definite increase in pollution.
215	20 miles an hour speed limit will not be the solution to reduce accidents. In fact it will encourage people for doing more speeding and cause danger, as nobody flow the actual speed limit. Driver can take further education to improve their driving, cyclist also need to be educated, majority of the time cyclist don't flow the rules.
216	stop slowing london down and deceitfully lining your own pockets with money for personal gain and power
217	feel very vulnerable driving along West Ferry road being overtaken by speeding cars breaking the 20 mph speed limit
218	As a pedestrian, I've found it far more difficult to cross Westferry Rd and Marsh Wall since the unrequested 20mph speed limited was introduced. Cyclists are causing a huge number of problems because they speed down the roads faster than the cars because of the 20mph limit. Please can we have speed calming measures introduced on the River Walkways against cyclists. Too many speed with total disregard to pedestrians walking along the pathways. Can we de-list the path as cycle route. There are too many arrogant cycle-terrorists riding footpaths and creating dangerous, life threatening conditions.
219	I think a blanket 20mph everywhere is unneeded, but it should be in the majority of places.
220	Education about Active Transport.
221	If you stick to the 20mph on the Isle of Dogs, people are overtaking you approaching crossings, on bends, and in general! It is becoming very dangerous because of it.
222	The strong reason why I disagree to the 20mph is because, I've have seen a lot lot more reckless drivers overtaking and honking at people like me that are trying to obey to the 20mph rule. In addition to that, it is not environmentally friendly, 20mph increase CO2 by 10%, and with the increase encouragement to "cycle to work" this put more people's health at risk.
223	Having driven in Tower Hamlets for the past 20 years I have found since the introduction of the 20mph limit it has caused more problems then there were. It is dangerous when you can't overtake a pedal bike and drivers are so frustrated that they dangerously overtake each other. Once past a driver sticking to the speed they are more inclined to drive at 40mph out of frustration whereas they would normally drive at 30.
224	I see so many drivers breaking the limit where I live on the island. Would love to see this limit enforced more
225	I do agree with the 20mph around the back streets of Tower Hamlets, but not on the main roads. I do not think the limit is necessary on the main roads of Tower Hamlets.
226	One or two maniacs that ignore the limit is enough to make roads unsafe for everyone. Therefore physically slowing down traffic and a fully automated way of detecting and fining people who break the speed limit is the only way to make roads safer. Can you imagine how it is if your young kid gets hit by a car and disabled for life?
227	Traffic cams pay for themselves in the long run and are in fact a bargain when it comes to protecting the lives of young children.

	Offenders need to pay high fines, otherwise it's never gonna work!
228	I'd say in increasing fine is appropriate: Maybe the first time you weren't aware that the limit has changed, so then a small fine. But people shouldn't make the same mistake twice, so after the first, the amount of the fine needs to go up a lot.
229	20mph causes more traffic
230	What next, a 5mph limit with with a man with a flag walking in front of your vehicle?
231	20mph is unnecessary. A deliberate attempt to annoy motorists.
232	It is harder to cross the road as the traffic is more backed since this 20mph started. When it was 30mph the cars were more interspersed and it was much easier to cross the road.
233	It is so difficult to tell which areas are 20mph in London and which aren't. Signage is extremely poor and before you know it, you've crossed into a different zone. Every borough seems to be doing its own thing which is highly confusing. It is also creating dangerous behaviours. You sometimes feel it is safer to go closer to 30mph to stop the driver behind you trying to make a dangerous overtaking manoeuvre. I support 20mph in contained areas like Wapping but the roads dictate that you drive slowly anyway and it continues to be flouted by boy racers for whom there is no penalty.
234	Just catch the crazy drivers
235	Please stop making 20mph zone. Bikes can ride faster.
236	I think we need to have far more enforcement. To be honest, I haven't noticed any reduction in car speed anywhere in the borough. You need to take it to the next level with police and/or cameras to really reduce speeds in the borough. Perhaps have a concerted education campaign and then introduce tough enforcement.
237	Traffic problems have got worse, I think that's a widely agreed fact. So, the only benefit would be a decrease in accidents but this information has not been released, so how do we realistically make a decision?
238	Plumbers row e1 1Ae needs 20mph speed enforcement as people drive down this street during the day and during the night (including drug dealers) breaking the speed limit with very noisy vehicles driven at high revs. Not only is this disturbing to the quiet of the road and anti social with drug dealers hanging around it's also dangerous to pedestrians because of the speed they drive.
239	It doesn't work. People still drive over the limit. At places where police presence is high it causes major traffic.
240	If 30mph rule were observed that should be sufficient. We get boy racers zoom around here at well over 30mph. They're the ones that need policing. I only support 20mph in the Cain hope it will slow them down. It's invariably young men who hang about with the music cranked up ruining other people's hard earned peace and quiet. There needs to be zero tolerance where they're concerned, yet they seem to be allowed to get away with it! Is it down to underfunding or some liberal policy to let them act like asses? I don't understand why the police aren't allowed to crack down on antisocial behaviour.
241	20 MPH does not make sense on most roads in Tower Hamlets. They may be applicable in "quiet" residential streets to reduce the risk to pedestrians but not elsewhere. What needs to be done is better enforcement of a "30 MPH" limit around the area - for example to stop idiots doing 50 MPH+ on roads around the Isle of Dogs.
242	biggest issue is that it isn't enforced
243	calming measures are destroying the roads on the Isle of Dogs - every water main break is at a traffic calming site
244	Whilst the aim of "reducing the speed" measures are laudable, human nature/drivers will always revert to their default speed in any given situation or road condition. Speeding drivers will always speed regardless of the measures in place. This is evident on a daily basis along the roads in question. Other drivers drive within appropriate limit and the measures have had a negative effect on congestion and cause dangerous driving. Measures to deal effectively with bad drivers should be the priority and a reduction in congestion due to over development.
245	Ashfield Street has no traffic calming and has constant speeding cars day and night "drag racing" down it, with some cars easily hitting 50-60mph before braking hard at the end of the road. There will soon be a fatality. Boy racers constantly use this street and the surrounding area to speed.
246	Please, please scrap this 20mph limit especially on the main roads of the Isle of Dogs. At 20mph it means cars are on the road for much longer, it takes ages to get anywhere and is really fuelling aggressive driving because it is so miserable being stuck at 20mph. Please bring back the 30mph limit and just police it over 40mph. That's sensible and will make everyone a lot happier.
247	Police seem completely uninterested in stopping drivers speedig or using mobile phones at the wheel. Guess it's not as sexy as chasing gangs or ISIS but more Londoners are killed by dangerous driving than gangs or terrorists.
248	Boy racer continues around the Sidney Square area; I also notice regular aggressive driving towards cyclists along Stepney Way. It is fine to implement a 20mph limit, but it would appear that it needs actual enforcement.
249	Council needs to stop wasting money on dangerous experiments. I have nearly been run over on a number of occasions by people trying to over take cars doing 20mph.
250	The 20mph zone has made the island more dangerous. More and more people get anxious to overtake causing chaos. Not sure if there were any statistics that shows 30mph was high for the island.
251	I have never seen anyone obeying the 20MPH speed limit - it is pointless unless enforced. What is needed is enforcement of a 30MPH speed limit in Westferry Road. It is used as a race track.
252	20mph limit is pointless without enforcement. Speeding at 40-60mph is common on Cartwright Street, Royal Mint Street, Dock Street and Commercial Road. The current limit is not enforced so how can a 20mph limit be enforced?
253	Ashfield Street E1 is used as a race track with drivers accelerating up to 60 mph on it. 20 mph signs are a waste of time if the speed limit is not enforced - indeed they are worse than useless as a) it brings the law into disrepute and b) people are hurt and killed by speeding drivers. Several have been killed within 300 yards of where I am sitting - more will be killed and injured if the problem is not dealt with
254	ALTHOUGH I WOULD SUPPORT DRIVER EDUCATION AND AN AWARENESS CAMPAIGN, I HAVE MY DOUBTS THAT THESE WOULD HAVE ANY EFFECT AND FEEL THAT PHYSICAL MEASURES, SUCH AS SLEEPING POLICEMENT WOULD BE MORE EFFECTIVE. PERSONALLY I FEEL A 20 MPH LIMIT IS IMPRACTICAL AND THAT A SPEED OF PERHAPS 25 MPH IS EASIER TO STICK TO. I HAVE ALSO HEARD SUGGESTIONS OF NARROWING MANCHESTER ROAD WITH CYCLE LANES, WHICH I FIND LUDICROUS CONSIDERING THE NUMBER OF PARKED CARS, ALREADY REDUCING THE WIDTH OF THE ROAD. NATURALLY WITH ALL THE NEW CONSTRUCTIONS SPRINGING UP ON THE ISLAND, THERE IS ALREADY A NOTICEABLE INCREASE IN THE WEIGHT OF TRAFFIC, WHICH WILL ONLY CONTINUE SINCE NO THOUGHT HAS BEEN GIVEN TO THE INFRASTRUCTURE. WESTFERRY / MANCHESTER ROAD BEING THE MAIN ROUTE WITH NO OPTION FOR ANY ALTERNATIVE SUCH AS RING ROAD. IT HAS BEEN EXTREMELY SHORTSIGHTED OF TOWER HAMLETS COUNCIL.
255	And more segregated lanes for bikes.
256	Make traffic lights favour pedestrians more than they currently do. Also I'd welcome bringing in congestion/pollution charge to the area. Many cars ignore speed limit on Marsh Wall, as one of the main roads people need to walk across in the area, this needs to be addressed. Introducing speed bumps along Millharbour (particularly the one way section approaching Marsh Wall) would prevent some cars from going excessive fast down there. enforcing the existing double yellow lines on Millharbour would also help improve visibility for pedestrians.
257	Make biking and pedestrians a priority. London can be walked. But at present drivers are aggressive and dangerous. Also introduce fines for drivers using their horns late at night in areas where people live. Globe Road is horribly noisy!
258	I live in Jodrell rd. There is speeding on this little road, I am amazed by how fast some cars and vans can go! Also cadogan terrace, right next to the children nursery gets speeding! The challenge with traffic calming measures like "sleeping policemen" is that they just cause a lot of noise for people who live next to them and drivers just speed up to them, short brake and fast accelerate
259	I strongly support the 20mph limit. However there are a number of main roads in the borough where the 20mph limit doesn't really make much sense and drivers disregard it. I think a better balance needs to be achieved between residential streets - with a 20mph limit - and through routes where a 30mph limit would be OK. I think this would probably be better supported generally and therefore adhered to.
260	It's difficult joining some roads where traffic is slower and lights release the next phase which exceeds the limit and catches the last lot out.
261	The 20mph limit is welcome, but the roads of Tower Hamlets still seem like the Wild West at times. Much more needed to filter back streets from through traffic and enforce this measure.
262	Although maybe the average speed has decreased there are still many vehicles exceeding the limit significantly, which mean the roads are still unpleasant and dangerous for more vulnerable users
263	Design is everything. Safe routes for north-south active travel (e.g. walthamstow/hackney <-> canary wharf)
264	More enforcement against drivers running red lights and not yielding when pedestrians have priority Action on idling engines would be good too - a big problem in the borough
265	Pedal bikes over take cars it is dangers when cars fly round cars going 20 mph As a driver I feel much more unsafe on the road
266	Please revert to 30 mph and ENFORCE it. I am fed up with being taiglated and overtaken dangerously by idiots when I am sticking to the 20 mph limit.
267	Some of the questions here are extremely ambiguous, particularly question 1. Even the buses and commercial vehicles dont stick to the 20mph around the isle of dogs..if you drive at 20 people get angry behind you..definitely not working..cars still apeed around the island..so what is the use..in my view has made no difference. Main problem is wxcessive apeeding cars and cars gathering under the roundabout at westferrt to use the area as a race track..perhaps deal with this first ?!!
268	More speed bumps please, cameras and proper enforcement. Would love more people actually in the street to enforce but suspect there's no budget. Have seen a lot of CCTV cars by Victoria Park but not sure if they are there for traffic enforcement. Great if they are.
269	no point having a speed limit when there's no enforcement

270	The low limit is dangerous for cyclists etc when a car cannot pass them without speeding. The limit is ignored by genuine dangerous drivers and causes impatient drivers to overtake dangerously
271	The 20mph zone has increased my likelihood of being struck by a car crossing the road as I am frustrated that cars are now following in long platoons and therefore take a very long time to pass if you are waiting to cross. Therefore I have noticed that other pedestrians and myself actually take more risky attempts to cross the road in very small gaps between moving cars rather than waiting for the cars to pass as we would have done before.
272	I live just off Westferry road between two of the speed cameras. Since the introduction of the 20 mph speed limit I have found the road to be much more dangerous. There is a pelican pedestrian crossing between the two speed cameras and since the speed limit was reduced it has become more dangerous to cross there as people speed up excessively immediately after the cameras and don't look for Pedestrians or on the other hand they are only going 20 so are also looking down at their phones and not watching the road for pedestrians. Also there are people overtaking coming up to the crossing (and elsewhere along the road). If the speed limit is going to be 20 it needs to be enforced properly, with traffic calming measures in place, otherwise it makes it more dangerous with some people obeying the law and others frustratingly trying to get past those obeying. While I agree with the 20 mph speed limit in principle, if its not enforced strictly, I'd rather see it at 30mph.
273	Why have this limit on main roads cyclists don't stick to 20mph they overtake all the time also how much money has been spent on signs & road markings etc & also the majority of roads see so much congestion & illegal parking it's often a crawling pace & I'm sure the police are best deployed in other areas rather than monitoring motorists
274	The 20mph on big roads is a burden and not exactly safer to most drivers and pedestrians. Although I stick to the limit, most drivers who follow me take me over, speed up and slow down at the camera. I hate to be generalising, but the worse offenders are the arrogant wealthy professionals and the uneducated young adult... Both are at great numbers on the island, in expensive cars and they drive carelessly. So no 20mph doesn't make and difference to safety and it only bothers the ones following the rules. Impact will be gained by police presence at unexpected locations.
275	I live on Wick Lane and the drivers entering this area from the A12 in the mornings and going back to it in the late afternoons are totally ignoring the speed limit and doing 40 even 50 mph on a regular basis when its a clear road.
276	I do not think the speed reduction has slowed all cars down at all. 30mph to me seems an appropriate speed on Manchester Road especially with other speed reduction initiatives in place such as raised pedestrian crossings.
277	http://reconnectrochester.org/southeast/2016/03/16/lowering-traffic-speed-will-save-lives/
278	I think the initial trial was not sufficiently enforced, and the 20mph limit will not be effective unless it is. I walk and cycle around the borough a lot, and am very concerned about the amount of very high speed driving I witness - beyond 30 mph as well as 20! I strongly support continuing this scheme
279	The problem with the 20mph speed limit is its blanket application; a 20mph limit on wide, four lane roads (e.g. West India Dock Road, Prestons Road, Cotton Street), especially where linking large capacity trunk routes, is ludicrous. The result is wide-spread disrespect for the limit, even in areas where fully justified. Dangerous over-taking, aggressive behaviour towards those who keep the limit etc. are all too often seen on the Isle of Dogs - even bus drivers break the limit (often by large margins), tailgate, flash their lights etc.. This is compounded by zero enforcement (e.g. on the Manchester Road). A 20mph limit on smaller roads is a great idea - if established in a properly-targeted manner, backed by proper law enforcement. The Tower Hamlets scheme has had neither of those things.
280	New physical traffic calming measures must not be of the 'central island' narrowing type that plague Tower Hamlets roads, such as Old Ford Road. These are particularly dangerous for cyclists, as they encourage speeding overtakes and close passes, and make roads both objectively and subjectively more dangerous for cyclists. An example of how physical measures can be designed to keep cyclists safe can be seen on Victoria Park Road, by Well St Common. 20mph limits in Tower Hamlets are currently ignored roughly 100 of the time by drivers. Those cars that do travel at 20mph (such as driving school cars) are routinely harassed and beeped, tailgated, and overtaken dangerously by other drivers. If the Met Police are not willing to properly enforce the borough's speed limits, the council should use its powers to use speed cameras and levy fines, prioritising those roads where cars going over the 20mph is most prevalent.
281	No road should be 20mph causes more accidents
282	20mph limit causes traffic, it is very frustrating which made me always want to overtake the vehicle ahead or beep at it, 30mph is a good speed for local roads
283	Speed at 20mph has had an affect in increase of traffic and congestion. There is no need of having 20mph in Tower Hamlets main roads or else it will get busy and busy. Currently there are far too many road works which already reduce the speed limit and causes many delays. Bring back to and leave it as 30mph we are a moving town and borough we don't like things to be slow, we like to the traffic to be flowing and smooth. So NO to 20mph, whosoever decided to come up with 20mph zone really need to read up on highway codes and driving awareness. With the current latest vehicles please check the calculation of brake distance against time that all give you the answer to it.
284	With parked cars, buses, roadworks and schools, cars drive to the appropriate speed according to the conditions. This in many cases is below 20mph. However, it is simply wrong to limit cars to 20mph when the conditions are clear. A 20mph limit is not going to stop the boy racers but will penalise normal drivers who happen to go a few miles over the limit
285	I don't feel that the limit is working at all - I live on Tredegar Road, which is a very small but equally busy road as it leads up to the A12. I'm pretty sure that a speed camera at some point between St Stephens Rd and Parnell Rd would rake in tens of thousands of pounds a year, as hardly anyone keeps to a 20mph limit.
286	20mph is a great idea but doesn't work because there is no enforcement. Where I live, E14 8AS we are surrounded by big roads (and small ones like Narrow Street) where there is little traffic calming and a whole load of anti-social driving with speeds up to 50mph along with the resulting noise and pollution. The council should really do more about this.
287	I drive in Tower Hamlets, walk and ride a bicycle as well as DLR and bus. The 20mph is causing huge amounts of driver and passenger frustration, especially at off-peak times of the day when traffic conditions used to allow more fluid travel. This not only affect drivers, but all of us who face higher taxi bills and much slower bus journeys. I have witnessed more accidents and more aggressive driving following introduction of the experimental 20mph speed limit than before. At 20mph, vehicles are on the road for 50% longer and IMPORTANTLY, this means that at any given spot there is now 50% more traffic. This means that car engines are polluting our air for 50% more time and the now constant stream of traffic (going very slowly) makes it much harder to cross the road than it was before. Speed bumps and chicanes increase pollution and road noise, not to mention the damage they do to car suspension and road surfaces. The 20mph limit is affecting my health, happiness and well-being so much, that I am considering moving out of the area. Certain key routes operated by TfL were left out of the 20mph zone, but on the Isle of Dogs, our key arterial routes were restricted to 20mph. For residents on the Isle of Dogs the following roads are critical for free flowing traffic: Westferry Road, Manchester Road, East Ferry Road, Limeharbour and Marsh Wall.
288	Please, please abolish the 20mph limits, or at the very least remove them on the key roads of the Isle of Dogs please.
289	Not only our journeys slower I have felt more vulnerable as a pedestrian. Cars seem to not slow or stop at zebra crossings, bikes overtaking and undertaking busses at slower spreads. By all means have 20mph by schools etc but reducing the whole area down when we only have two ways of the island is ridiculous.
290	20 mph requires driving in 3rd gear - this impacts on air quality and the air is far too polluted already in London.
291	There are enough traffic problems on Westferry Rd as it is without the further complication of having to restrict speed to 20 mph.
292	20mph near schools with calming measures that don't rip the bottom of your car out ok but a blanket 20 mph limit is Rediculous and Actually Causes Incidents
293	As a driver the roads feel more dangers at 20
294	It isn't observed by young male Bengali drivers on Cavell Street that I can tell you. I've been almost knocked off my bike or run over many times by these dangerous drivers on Cavell Street. Also racing down late at night. There has already been a death of a cyclist on Cavell Street from such a driver (I think it was last year). I think this is a wider problem of anti-social and dangerous driving by Bengali made youths that needs to be addressed, policed and enforced before there are more deaths. Perhaps speed bumps need to be installed also.
295	I drive to work in Tower Hamlets most days and the limit is as infuriating as it is pointless. My attention is diverted from the road constantly checking my speedo as its so unnatural to drive at this speed. I've seen road rage from drivers who intimidate the driver in front for sticking to 20mph. And it's particularly ridiculous at 7.30am on a Sunday driving along Grove Road and Roman Road at 20mph when you're the only car on the road.
296	Give the police more money to police the roads of Tower Hamlets instead of further adding to the traffic woes of drivers in the borough with this pointless limit.
297	I agree with a 20mph limit on smaller roads where the road condition causes this speed to be necessary (i.e. on smaller residential roads). Enforcing a 20mph limit in places where the road has clearly been designed for a higher speed of traffic (such as many of those listed here) only results in the majority of traffic continuing to travel at 30mph, causing danger to the few who choose to follow the listed limit.
298	The 20mph limit is not 100 percent effective but it certainly helps to reduce the average speed in the area.
299	Additional physical measures should be taken around junctions to ensure speeds are kept down, especially the junction between Manchester road, Westferry road and Eastferry road.
300	slow traffic only increases more pollution to the area. 20mph is so dangerous and where in the highway code does it have a 20mph limited I fill it is just another way to make money from the drivers.
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301	I have just bought a house on Old Ford Road and there are so many people driving dangerously fast and ignoring the 20 mph limit, I find it frightening and I am even considering putting my home back on the market and leaving the area. I would love to see speed cameras, road humps, flashing signs or whatever it takes to slow these dangerous drivers Down. Also driving in tower hamlets in general seems very hostile and aggressive after north west London where I have recently moved from, there is also a lot of cars and motorbikes who have tuned their engines to be louder for posing/ being cool etc and it's very unpleasant if you live on a busy road such as Old Ford Road, I am fully in support of slowing all traffic down and making it a safer and quieter more pleasant place to live!
302	I live in Old Ford Road and it is an absolute nightmare - noisy and dangerous with the speeds some people are doing on that road - something needs to be done - with the 20 Mph speed limit at a minimum speed cameras and regular police enforcement needs to happen or there will be a dangerous accident soon - I'm certain of it! Please please please do something about it!
303	I realise that 20mph is safer insofar as a driver has more chance of stopping in time, but it does seem to lead to a lot of frustration, which in turn leads to drivers taking dangerous chances and trying to overtake. Would 25 mph be more likely to avoid this reality?
304	I get overtaken at 20mph every day. Why don't the police have a period of driving round the isle of dogs in unmarked cars and start to prosecute people breaking the law? Whats the point of having a law if its not enforced? I live on a quiet residential street. Often I see cars hitting 50mph plus. Calming measures such as reduced road widths, reduced parking, should be brought in.
305	20mph limits are appropriate along narrow or purely residential roads but not a blanket limit across the Borough. If I drive at 20mph then other drivers overtake which is creating less safe roads.
306	30mph too fast 20mph too slow. Expensive to enforce. 25mph or 40kph would feel better for car gearing.
307	Cars are not the enemy keep 30 apart from near schools and prosecute dangerous driving , turning at Mile End cross illegally etc and taxis parked middle street. Easy just to penalise motorists.
308	I am horrified at the thought of the 20mph limit being removed on old ford road - there has been one serious accident here and drivers regularly drive way too fast on this road, making it dangerous for pedestrians and cyclists. Please consider a speed camera where old ford meets approach road and support your residents over drivers.
309	I note that bus drivers still fly along Manchester Road in both directions. There should be more traffic calming measures/cameras in place to prevent/deter the speeds that are currently being achieved. I've been carried on a D7 bus at over 40mph between Island Gardens / Blue Bridge.
310	The 20mph speed limit seriously increases the amount of congestion on the roads.
311	I was prompted to complete the survey as I (and many of my neighbours) firmly believe that most drivers do not respect this limit in our street (Ferry Street). In fact we were about to write to the Council to ask about the feasibility of installing some speed bumps in our street to reduce the high speeds we regularly see being undertaken by many drivers. Aside from the noise (especially at night) being most intrusive, more importantly we are concerned for the safety of children and elderly residents who would have little time to take evasive action in the event of encountering such drivers. That aside we are puzzled why Ferry Street gets the level of 'through' traffic it does as the street effectively 'turns round on itself' (apart from the exit into Saundersness Road which can be easily accessed from Manchester Road). We would have thought that Ferry Street would mainly be used by drivers who live in the street but for whatever reason we see many through-drivers speeding along Ferry Street rather than using the parallel main road. I should be grateful if you could note these comments for your records and pass to relevant colleagues for review and response.
312	With thanks
313	Everything must be done to try to get Drivers to understand how important it is to reduce there speed in London. With more and more people living in London.
314	More enforcement is essential. If you actually drive at 20mph on many of Tower Hamlets roads then other drivers are likely to follow to closely or even overtake (yes, actually overtake, on Roman Road).
315	Current habits of road users mean a practical minimum speed on many roads is 25mph+. Some enforcement would be welcome.
316	cycle through Tower Hamlets almost every day. There is a noticeable difference in roads at 20 miles an hour. When I cycled in Hackney, the 20 mph limit made a real difference after a time so I think it's a no brainer really. Keeps more people safe.
317	like the misuse of mobile phone use in cars by drivers not many drivers adhere to the 20mph limits. if there is little chance of being caught then drivers will ignore the speed limits. I work for a company as a driver and use various boroughs roads who deploy the 20mph limit. I find about 90% of drivers ignore any speed limit in London boroughs roads. Rarely see police cars on roads - speed cameras slow people up but in Islington cars just slow up at the camera and then speed up again. It isn't working in the way councils want. It's a government thing - there isn't enough manual enforcement around so drivers know they can get away with it. The A12 has in Tower Hamlets a 40mph limit and often cars whizz along at 60mph or more - regardless of limits people will exceed them
318	There is no point in having rules if there is no enforcement. In my road the limit is broken several times every day, at weekends and nights mainly by noisy racing cars. Only speed cameras facing in each direction would seem to be effective.
319	As a cyclist, I strongly support lower speed limits for motorists. Many motorists do not seem to be aware of the vulnerable position that cyclists are in, in comparison to that of a motor vehicle driver. I tend to cycle on the quieter roads around the borough. I find that the speed limit is regularly broken by motorists, particularly at night, in the quiet roads around south Bow and Limehouse in particular. This appears to be done by joy-riders or "boy racers", who seem to think that their car is a toy rather than a potentially life-threatening and terrifying object for others who use the roads. It is for this reason that I believe there should be more traffic enforcement and/or driver education measures on the borough's quieter roads.
320	I feel main roads around the isle of dogs should revert back to 30 MPH but side roads should stay at 20 or maybe 15 mph. has for my turning Ferry st they should install sleeping policemen as car speed in ferry st all the time & have no respect for children playing in this built up housing estate. one the main offenders is the estate agent at the top of Ferry Street . they are a major accident waiting to happen.
321	Educating school run drivers to NOT DRIVE - the volume of (speeding) cars when the school term is operational is bonkers vs the holidays. If they can get into a school, it's mostly because they live close by. So get up 15 mins earlier and WALK.
322	I am part of the Old Ford Road residents who with Amy Whitelock-Gibbs are trying to deal with the speeding along our part of OFR. We don't want to revert back to 30mph and we do need much better signage and a greater increase in driver education.
323	Important to keep 20mph on Isle Of Dogs main roads as they're narrow & not much alternative for cyclists but to use them. Not so important to keep 20mph on roads where cycle lanes are protected from traffic.
324	I put Yes for 20mph on Whitechapel Road because the cycle lane is incomplete by the market. If the cycle lane were to be completed, the road could stay 30.
325	The 20mph speed limit should be confined to side roads, main roads should be 30mph.
326	On A road, the 20mph limit could cause quite a few jams. It is already difficult, during peak time, getting a bus from Mile End to Aldgate, it would be more appropriate trying to lower the number of cars in circulation
327	I live in New Festival Quarter (Upper North Street). It is a 20mph zone with several schools nearby, and there is a speed bump to enforce the speed limit. However, many drivers seem to completely ignore the limit - if you look at the road surface next to the bump you can see that cars go too quickly and damage the road surface (and, presumably, their vehicles).
328	This creates lots of noise for residents (seems to get used as a rat run), is dangerous for pedestrians (particularly kids and those who are less mobile), and damages the road surface. A speed camera or one of the speed warning signs (the ones which say "slow down" to drivers going too fast) may be beneficial.
329	In my immediate area there are regularly drivers travelling at 40mph+. Any scheme to discourage or punish this would be appreciated as it could be extremely dangerous.
330	A blanket 20mph limit is unnecessary and ineffective. Drivers would respect a 20mph if used at specific locations where absolutely required. Placing an inappropriate limit on a road reduces the respect drivers hold for all speed limits.
331	The difference between being hit by a motor vehicle travelling at 20 or 30mph is often the difference between life and death, or at best, serious and debilitating injury. Please be bold, be brave and keep the 20mph limit across Tower Hamlets and fight for its introduction further afield.
332	There is a balance to be struck between keeping traffic flowing at 30MPH along main roads and enforcing the 20MPH limit in both residential areas and congested business areas such as Commercial Street. Given many drivers are currently tailgating cars doing 20MPH in the roads listed in Q4, the current situation is creating driver tension and is arguably counter-productive to improving safety.
333	N/A
334	Whilst 20mph limits sound good - and in principle I support them - it's really important to look at the evidence of whether they actually work to reduce accident numbers and reduce the severity of accidents. There is lots of evidence to suggest that 20mph zones only reduce driver speed by an average of 1mph - which could mean a lot of investment to introduce the lower speed limit, for not much benefit. There are things you can do to better enforce the lower limit - but again you need to review the evidence about which enforcement approaches work. The best seem to be physical traffic calming measures. Education and awareness campaigns have almost no effect unless they're a top-up to hard levers like physical traffic calming and tough police enforcement.
335	/
336	A 20 mph limit on the small, side streets is good and worthwhile but it is totally inappropriate on the A roads. The major points being 1. Journeys take 50% longer so there is both 50% more traffic and pollution in our streets for 50% longer. 2. Increased resident frustration 3. An increase in road rage. 4. No apparent evidence of lower accidents (the opposite could even be true due to more overtaking) 5. Slower bus journeys. More expensive taxi trips and delay to everyday life in general.
337	I feel that cameras should be introduced to manage the 20mph limits more effectively
338	I really think the 20 mph on non-major roads should continue and be perhaps more strongly enforced especially as from my experience people of this borough seem to like their cars, therefore rely quite heavily on them when perhaps they should be considering other means of transport and also many of those drive too fast.
339	I live on the Isle of Dogs and am continually being overtook or tail gated when trying to adhere to the speed limit. The overtaking on the wrong side of the road and blind corners are going to cause terrible accidents. Yes the 20 mph on the inner roads is a very good idea but not on the bud routes.
340	The frequency of speeding cars in my residential neighbourhood is frightening and dangerous.

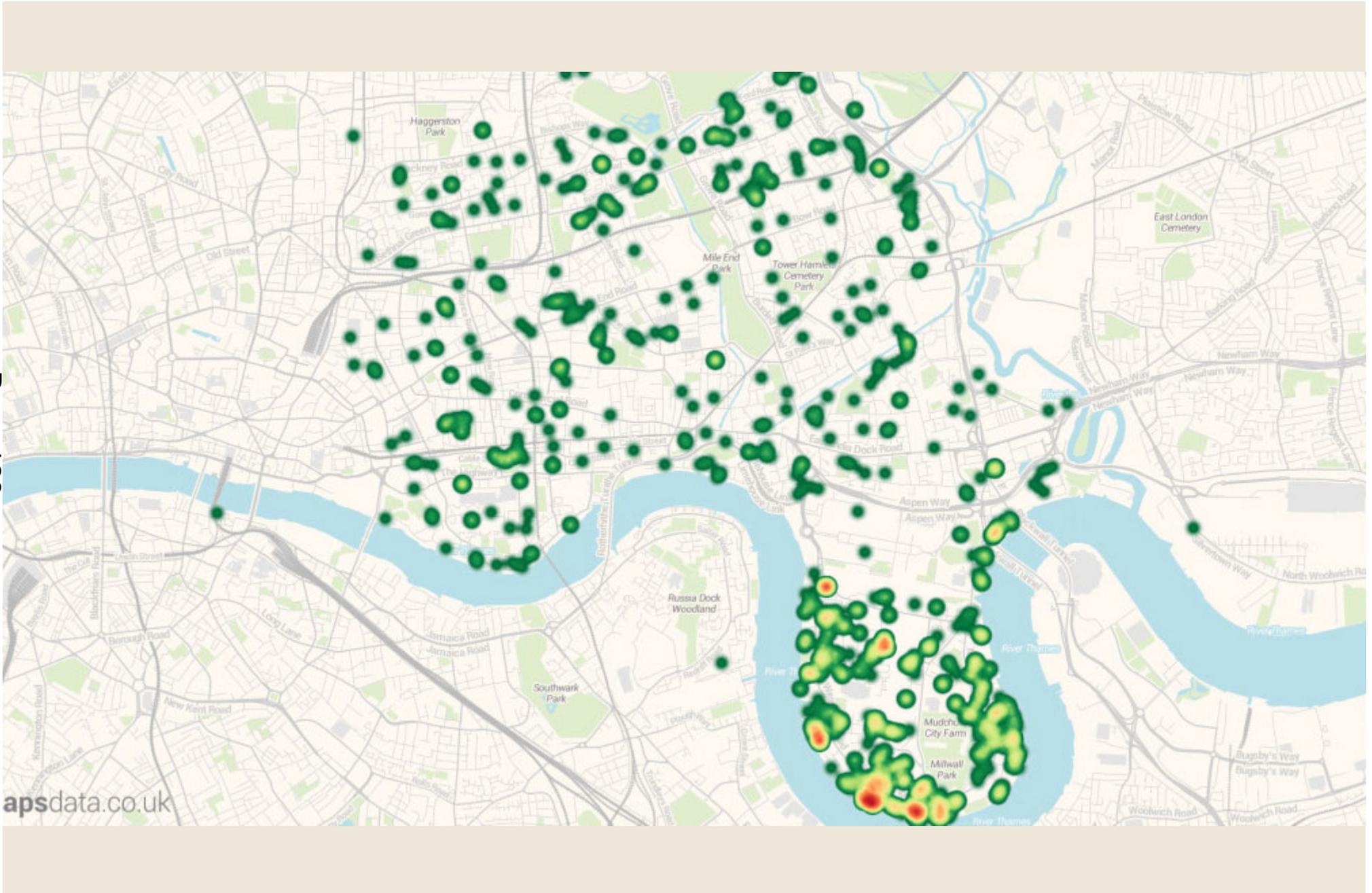
	I think, there are still way too many people driving across Whitechapel, and Tower Hamlets in general, way beyond the speed limit, making the streets an unsafe place for cyclists and pedestrians.
337	If the whole traffic could decrease in favor of public transport, all the population could benefit from a cleaner air and safer boroughs.
338	Driver awareness definitely needs to be looked into. There has been a number of occasions where I have been overtaken whilst driving at the 20mph speed limits.
339	I think this is necessary to make the roads safer for vulnerable cyclists.
340	there are lots of joyriders along stepney way, there need to be measures to tackle it.
341	This just slows everyone down. Have a blanket 30mph limit and do average speed checks
	More effective speed bumps. The currently speed bumps that are essentially islands can be easily avoided by motorbikes and wider vehicles.
342	However, speed bumps like those on Hertsmere road or East Ferry Road (behind Castlia Square) are too steep. You have to crawl over them at 5mph or risk damaging your car. This is really not helpful for anybody.
343	If people drove safely it would not be necessary but many people do not so the speed 20mph limit is necessary.
344	The limit has not been effective. Buses, taxis and event the police flout it with impunity, giving little incentive to private drivers to adhere to it. As it is so slow, many people have simply disregarded it and it appears that there are many more people driving at well above 30 than there were before the reduction of the limit.
345	The current 20mph limit seems to be mostly ignored
346	It is impractical and unnecessary on any major roads / trunk roads. On side roads or residential streets, or those with limited access (e.g. only space for one car at a time) a 20mph limit makes sense. Effort should be made to ensure safe places to cross and educate on the dangers for pedestrians.
347	I don't feel safe driving in the 20 limit and having to check my speed, looking down from the road constantly My car (and I suspect others) are not geared to comfortably idle at 20, so it is stressful to have to monitor it. My cruise control also won't operate at that speed, and I suspect that's not just my car I also find the speed bumps excessive and put in places where there isn't an issue, plus they can be extremely damaging to cars/suspension If you want to enforce the limit, put up speed cameras at the key danger points, and use the revenue to pay for police with radar guns to be more proactive/cover the rest of the territory The blanket limit for me unfairly penalizes the majority of safe drivers. You should target the unsafe ones specifically rather than all of us Cheers
348	Traffic studies show that slowing traffic doesn't increase jams.
349	20 MPH limits are fine for purely or primarily residential streets, but in some cases drivers are not just popping around the corner but need to travel significant distances. In this case 20 MPH limits can additionally hamper their progress over and above all the other anti-car measures across London (in recent times it has taken me over 90 minutes to get to the M4 from Tower Hamlets which I need to get to to visit my aged parents). I have also noted an increase in pedestrians just wandering into the street mere meters from designated crossing points. It is therefore imperative that we keep core routes as 30MPH and educate drivers, pedestrians and cyclists on their rights and responsibilities with a view to keeping traffic moving on these routes.
350	I think the 20 mph is more dangerous because it is significantly slower. This means that it is more relaxed for a driver and the driver can become less attentive. The higher (yet slow) speed limit of 30mph allows the driver to remain alert for hazards. The 20mph should still remain around schools etc as it has been previously as then you know that you are reducing your speed due to increase precaution required due to unpredictable hazards. In brief: the variable speed limit is preferable to highlight where extra care needs to be taken. The slower speed limit allows the driver to relax more and 'sightsee' thus causing more danger. Yes, they can break faster, but they are also less alert. It is also incredibly hard to adhere to 20mph where once we driver 30mph and I always end up driving 24/25 mph because of the stress from cars behind who don't want to adhere to the new limit. I have been honked at, angry cars overtaking as they know there are no camers. It is just simply more dangerous and incredibly inconvenient on quiet evenings when the road is clear.
351	20 mph doesn't seem to be adhered to on the Isle of Dogs. Lack of police enforcement does not help with this. As a cyclist I do find it slightly dangerous that I can cycle as fast as cars are allowed to go. They should be overtaking me rather than driving side by side.
352	The 20mph speed limit is ineffective, everyone ignores it as it's not sensible and should be removed to revert back to the national standard speed limit of 30
353	Enforcement is key otherwise it is an empty exercise in putting "20" signs up and no difference to speed driven (and therefore no less risk of a serious accident). Where there are no physical traffic calming measures, people still drive at 30 regardless of the signs, I find this difference myself when I use Old Ford Road compared to Cephas Street. I cycle at nearly 20 mph so the speed bumps slow the cars to my speed (and the 20 limit), and prevents dangerous overtaking on the narrow roads. Without any bumps (as in Old Ford Road), drivers go faster and are more likely to try to recklessly overtake me at speed.
354	Enforce his with lots of speed bumps and put bollards to stop people turning against the flow of traffic on main roads
355	I think this is a brilliant idea
356	The problem really is one of enforcement. We have all these 20 mph signs in the Borough of which about a half of drivers take not the blindest bit of notice, and the police do nothing to enforce them. In our conservation area we have speeding motor bikes 24 hours a day using the cycle lanes as a rat run in defiance of signs that we got the Council to put up a few years ago. Complaints to the Council and the police receive only cursory interest. It really is the time for the police and the Council to show some leadership and do something to protect the residents instead of burying their heads in the sand in pursuit of a policy of, at worst, malfeasance, and at best, nonfeasance. Please can we have a firm response to the problem of speeding traffic throughout the Borough.
357	I think that Violet Road (Nr Devons Road DLR station) should also be added to this list. Drivers speed down there constantly. It is also very built up residential area with lots of family homes and I feel that the road presents an obvious danger to young children. In this case I think that physical traffic calming measures are needed.
358	I feel the limit may have value on the large roundabouts (though I don't see much evidence of it being obeyed) however, on the other roads I find it to be counterproductive and quite dangerous; I have found myself being partially undertaken by cyclists which means I am driving alongside them for too long which I don't think is safe. It would be far better if I were allowed to safely overtake them. I also believe that driving for long stretches at that speed makes a driver less attentive; it becomes very tedious and attention wanders. The real danger on these residential roads are the 'boy racers', delivery drivers etc. who believe it is their right to drive at whatever speed they choose. Last week on Manchester Rd, obeying the speed limit, I was undertaken by a cyclist who proceeded to do the same to a learner driver who wanted to turn left. All three of us were then overtaken on the wrong side of the road (with oncoming traffic) by someone doing at least 40/50mph who then raced off into the distance. 20mph limits do not deal with these considerable dangers. Putting in more absurd traffic calming measures (I presume to slow down the 4x4 vehicles that drive over normal ones with little effect, ends up causing more sensible vehicles considerable damage.
359	I disagree with blanket 20mph speedlimits as in most cases I feel they are unnecessary. That said, I do agree that they should be in place in particular spots e.g. outside schools, children's playgrounds and particularly dangerous junctions.
360	I am not aware of our borough having a problem with road safety; in any case I feel that low limits on busy roads increase pollution, congestion and noise; I realise this is unrelated but you might want to have a good look at Rotherhithe tunnel -- the fumes that gather there during peak times make the air totally unbreathable and it is a popular passage with both cyclists and pedestrians not just drivers. I think a new air venting system is necessary. Thanks and good luck. Matei
361	There should be a strong clampdown on vehicle racing in the borough.
362	I wish there was a way to discourage mobile phone users, drivers turn into Mansell Street and completely ignore the pedestrian crossing because they are on their phones.
363	Each vehicle takes longer to complete it's journey thus emitting more pollution into an already highly polluted borough. Combined with the narrowing of some major roads to install cycle lanes, the queues of almost stationary traffic have lengthened considerably. I would strongly endorse more cameras to keep the 30mph enforced thereby reducing the actual speed from drivers who speed from camera to camera (especially motorbikes).
364	We also need to see the stats on road safety before and since the 20mph trial.
365	I think traffic congestion is bad enough without speed limits
366	On Devons Road there are many cars "racing" down at various times of the day and night, and I feel it's only a matter of time before someone gets seriously injured or killed. This is unsafe and measures need to be introduced i.e. speed cameras, pedestrian crossing, traffic lights etc.
367	The 20 mph (even when 30 mph !!) limit is causing many impatient drivers to carry out reckless overtaking. I am speaking from personal experience. I have also been a passenger on a bus which the driver appeared to flash his headlights at the car in front of him because he was driving at about 20 mph.
368	More car calming measures needed especially near schools.
369	The 20MPH blanket unacceptable you can do over 20MPH on a push bike, I only agree with strict speed limits of 5MPH outside schools and it should be ENFORCED - Thankyou for reading my opinion
370	I think the 20mph makes sense for such densely populated areas. Perhaps the main roads could stay at 30 or be variable speed limits according to the time of day and volume of traffic (effective on motorways). Or we need more traffic calming measures to ensure the 30mph speed is adhered to on these main roads, whether that be physical measures, more speed cameras and/or police catching people who do speed. The Highway, where I live, can be like a race track at certain times of the day.
371	There is still a significant number of road users who ignore the 20MPH this results in the current approach being more dangerous - as the incidence of illegal tail-gating and dangerous overtaking increases. Without enforcement it is only a matter of time before the 20MPH zones actually result in casualties.
372	ON CABLE STREET JUNCTION WITH CANNON STREET ROAD PLEASE PUT UP NO HORN SIGNS, CARS OFTEN ARE CAUGHT UP IN CONGESTION AT THESE LIGHTS AND AS I LIVE RIGHT BY THEM CARS ARE CONSTANTLY BEEPING THEIR HORNS LOUDLY AND LONG, THEY MAY FIND IT FUNNY BUT THE RESIDENTS ARE NOT HAPPY - SOMETHING NEEDS TO BE DONE
373	The problem appears to be mainly on the smaller / side roads, and late at night where individual cars can be extremely and unnecessarily fast. Some speed cameras on residential roads would be great.
374	There is widespread driver disregard for the 20 mph limit in my area of Tower Hamlets. Until the speed limit is actively enforced by regular, consistent ticketing & fines, the dangerous speeding through residential areas will continue unabated... and the 20 mph limit will continue to be a sad joke.

374	Not much point in setting new limits if no one gets prosecuted or fined. Better focus on access of pedestrians (and to some extent cyclists) and promoting this, rather than looking at measures for motorists.
	I fully support the 20mph limit as I am a cyclist and pedestrian. The speed of traffic is often limited by the high levels of parked vehicles on both sides of the road and traffic jams, but I frequently see vehicles travelling too fast when they have some empty road, so I'd be happy to see some enforcement.
375	If traffic calming measures can be introduced which do not cause increased danger to cyclists, I would be in favour of them. However, road narrowings are often hazardous as cars try to squeeze past. Also, some recent speed tables haven't been installed very smoothly and they are pretty clumpy to cycle over.
376	20mph limit is a nonsense and I only bike-ride so I am not even biased.
377	20mph speed limit is too low for city driving and should be abolished
	The 20mph limit hasn't benefitted Tower Hamlets as people are just as dangerous. It's extremely frustrating when pedestrians walk across the road leisurely in front of oncoming traffic as they feel the cars are going slow enough for them to do so. The 20mph limit also encourages road rage as drivers are getting
378	frustrated that a simple journey takes so long- example: Manchester Road.
	The implementation of 20 mph limit on main busy roads is one of the most stupid, ridiculous, and dangerous waste of time and money I have seen in my 26+ years of living in Tower Hamlets. Hardly anyone follows it apart from very, very few drivers such as learners and so this leads to frustrated drivers tailgating and even overtaking, creating extremely dangerous situations where cars have to face incoming traffic. There is already a lot of traffic in East London especially for example in the Isle of Dogs area, and the 20mph limit only exacerbates this, not only for cars but for buses as well. Cars mainly just slow down for the speed cameras braking sharply also creating dangerous situations. It will be very hard to enforce due to the sheer number of roads and even the police do not follow it, I have seen many regularly break the limit when their sirens or lights aren't on so not attending an emergency. Indeed there may be an emergency reason for a person needing to get somewhere eg blood donor, delivery, medical emergency, appointment etc, and having to go at 20 on a MAIN road such as Westferry Road is incredibly frustrating and just plain silly. They're aren't accidents because of the speed but because of negligence and the ones that break the 30 limit will break the 20 limit anyway so there is no point. I challenge any one reading this to drive strictly at 20 all day and see how many cars overtake and tailgate and see what reaction you get. Is this safe? Is this wise? Absolute nonsense.
379	The Preston's road and Manchester road limits are ignored by the majority of driver's and there are a considerable number of collisions that occur which is very dangerous. There are lots of children that use those routes who are at risk. There are often people racing down those roads and I rarely see any police presence
380	stopping them. The bus lane signs are also frequently ignored by people on Preston's road.
	I am fed up with drivers not respecting the speed limit in Manchester road and Westferry road when we have so much as 4 primary schools and 1 secondary school. I find especially Arnhem wharf primary school very dangerous . People park everywhere to drop their kids and the one who need to cross the road to get a
381	bus by the Sailing centre got no lollypop man or support to cross.
382	This is only worth having if it is enforced and results in slower traffic. Let our kids take our streets back from drivers!
383	There is no apparent enforcement, so my neighbourhood streets like Salmon Lane, Ben Jonson Road and Aston Street are constantly overrun by people who speed up as fast as possible between humps in the road. I don't think anyone takes the speed limits seriously, and it's incredibly scary as a pedestrian or cyclist.
	As a cyclist with a house on Kenilworth, cars come up this road so quickly that it rattles our lounge windows. Terrifying as there are lots of young families in the area, not to mention a primary school.
384	Roads are in general disrepair on all parallel roads and speed cushions do nothing to deter speed on these roads - especially as people use this as a by-pass to avoid traffic going towards Roman Road market. Thanks for seeking our opinion.
	I agree with the 20mph limit but no one is complying with it. I see cars doing 60mph or more on straight sections of Aston Street and even on Halley Street every day. The speed limit is meaningless if it is not enforced and no one obeys it. The existing speed bumps in the area don't seem to make any difference at all
385	because they are in the middle of the road and easily avoided.
	the speed limit just increases journey time, and I have seen most people still drive in excess of 30 mph. which means putting a 20mph limit just causes them to speed even more. speeds humps are not effective either after midnight, as I have seen drivers doing over an excess of 50mph on thomas road (off burdett road) and flying over speed humps.
386	in cotton street (poplar) drivers are doing over 40mph on the uphill section, next to santander bikes
	Although the speed limit on Preston's road (Blackwall) is 20mph, drivers will often dangerously exceed the limit, ignore the red lights and swerve recklessly between lanes. This occurs daily, at any time of the day. In addition, families with small children and regular pedestrians often have to run to cross Preston road as
387	there is only one pedestrian crossing near the roundabout. I think other measures should be taken to deter speeding vehicles and avoid potential accidents.
388	20mph limits on all roads in Tower Hamlets, especially the ones managed by Transport for London
389	None
390	Enforcement is key, and also physical traffic calming measures to prevent people speeding
391	THE 20MPH LIMIT WILL INCREASE POLLUTION, ENGINE WEAR AND TEAR.WITH INCREASED FUEL CONSUMPTION IT IS ALSO HARD TO ENFORCE.
392	limit to 20 can not be good for drivers,environments,safety and fuel. it will increase traffic and movement of people more unattractive.20 miles is ok if there is no pedestrian walking facility(pavement).if there are pavement why 20 miles limit?dose not make sense at all to me.
	20mph scheme ill conceived, ignored by the drivers who present the most risk, bus drivers ignore completely. 30mph limit was barely enforced by 'revenue cameras' so inadequately enforced 20mph utterly pointless. impact statistics taken in isolation suggest 20mph protects pedestrians. it puts cyclists at greatly
393	increased risk due to overtaking cars forced into proximity with ever increasing numbers of cyclists for longer periods of time. many cyclists also break 20mph limit with ease.
394	Part of my job is driving and I feel 20 mph in densely populated urban areas is a safer way. I would also like to see the 20 mph strictly enforced, the sooner drivers realise they can't break the limit without being penalised the safer our roads will be...
395	By and large, I don't believe that drivers adhere to the speed limit. Motorcycles in particular are often going at high speeds.
	I think the 20mph limit should remain in force on minor roads, but removed for main traffic routes. Living on the Isle of Dogs, I have noticed much more congestion and dangerous driving (e.g. overtaking when not safe to do so) since the 20mph limit was brought in- especially on Westferry Road and Marsh Wall. This
396	makes the potential risk of accidents higher rather than lower!
397	Without enforcement 20mph zones encourage reckless and dangerous driving which will result accidents .
398	These zones promote bursts of speed between cameras ' & increased engine inefficiency. Given the volume of diesel vehicles, this contributes to increased pollution, particularly around areas like schools, harming the vulnerable while making little difference to compulsive speeding drivers.
399	There are a lot of schools in Tower Hamlets, slower traffic around these areas can be life saving.
400	The road humps and traffic islands are really useful in E3 although some younger drivers do still speed by.
	Manchester Road/Westferry Road and Westferry Road/Spindrif Avenue junctions should be better monitored as many drivers speeds there far above 30mph.
	Westferry Road/Spindrif Avenue junction is very dangerous to cross for school children (both St. Edmund's and Harbinger school, as we'll as Canary Wharf temporary school). Many drivers do not slow and let young pedestrians cross the road safely.
401	There should be a zebra crossing.
402	cycle around tower hamlet and it would be better and safer if the speed limit is reduce.
	I drive on Preston's road, up to the Blue bridge, on a regular basis.
	I sit close to the 20mph speed limit and as such I have been undertaken / overtaken at speed, swerved past and have had numerous incidents as the speed limit is inappropriate. As such, it is largely ignored leading to a large difference in speed between traffic.
403	I do agree with the 20mph speed limit on Manchester road and Preston's road past the Blue bridge. On many of the non-trunk roads, it makes perfect sense.
	I have mixed feelings about 20mph limits. I strongly support them for safety on residential streets, any areas where children might be crossing the road or playing near (or in) the road, and areas where there are a lot of pedestrians - and although speed bumps are the bane of my life I think they do work at reducing speed.
	But as a driver I also find the limit frustrating on main roads - and it is routinely ignored, so if you try and drive at the limit you end up (however wrongly) frustrating drivers who want to go quicker, who then perform risky behaviour such as driving too close, dangerous overtaking and speeding off too fast once they've got past. I also personally would prefer to drive at 30mph on larger main roads when I judge it is safe to.
	I don't think police enforcement is a good use of resources (and I've often seen non-emergency police cars driving over 20mph in the zone). But I think if you decided to keep the limit then without some kind of enforcement measure it will continue to be ignored. I would be interested to know more about any specific
404	evidence to support 20mph on main roads - if there is strong evidence showing benefit I would be more inclined to support it.
405	I have already written to signal that in Cable Street and Cannon Street cars speed very dangerously. And there's no police patrolling the streets or controlling the cars' speeds.
406	On Manchester Rd./Westferry Rd. it would be a great achievement if traffic could be kept to 30mph or below especially in the evenings/night when it seems to be used as an unofficial race track. Not even the cyclists keep to the 20mph limit.
	I see a lot of (mostly) young men driving very fast (over 30) around the small side roads where I live, it is very dangerous and unpleasant, and nothing seems to be being done to stop them. I've seen speeding cars come up on the pavement inches away from pedestrians, and a cyclist knocked off his bike (both these
407	incidents were in Philpot street). I think a physical plain clothed police presence to catch and stop these individuals is needed.
	Especially necessary in Tower Hamlets due to the third world driving standards, blatant breaking law on using mobile phones whilst driving and highest air pollution
408	in london
409	The problem with setting up lower limits is that while it increases pollution (engines are still running high and are not designed for extremely slow speeds) while irritating drivers. The ratio cost/benefit is then exceptionally low. Except in tiny residential streets, I really don't see the point.
	I live on Harford Street and regularly see drivers accelerating harshly between speed bumps in the local area including particularly along white horse lane. As a driver myself I know they must be doing over 30mph. I doubt that driver education would work and sadly feel the only way to reduce their speed would be
410	traffic cameras. Could this area be considered as 20mph speed zone too?
	Although 20mph may encourage some local drivers to consider their speed most vehicles do not even try to curb speed, including construction lorries using Roman/ Grove Road and all delivery vehicles. Side streets are still too fast and overtaking in Old Ford Road is an issue. It seems that lack of enforcement means that
411	most people take no notice so why bother to continue.
	This 20 mile limit is proving to be dangerous for pedestrians and drivers alike. People are taking more chances running across the road thinking they have plenty time to get across. Cycles and cars are cutting up other cars. Cars are over taking slow moving cars. School children are taking chances running across the road.
412	Cyclist are racing to beat the cars. Drivers lose concentration and are frustrated.
413	The 20 limit introduces congestion
414	Speed limit of 20 mph is putting bicycle riders in danger as they do move faster than that in most cases and overtake vehicles on each side. 20 mph limit creates a hazard to drivers, riders and pedestriansee..

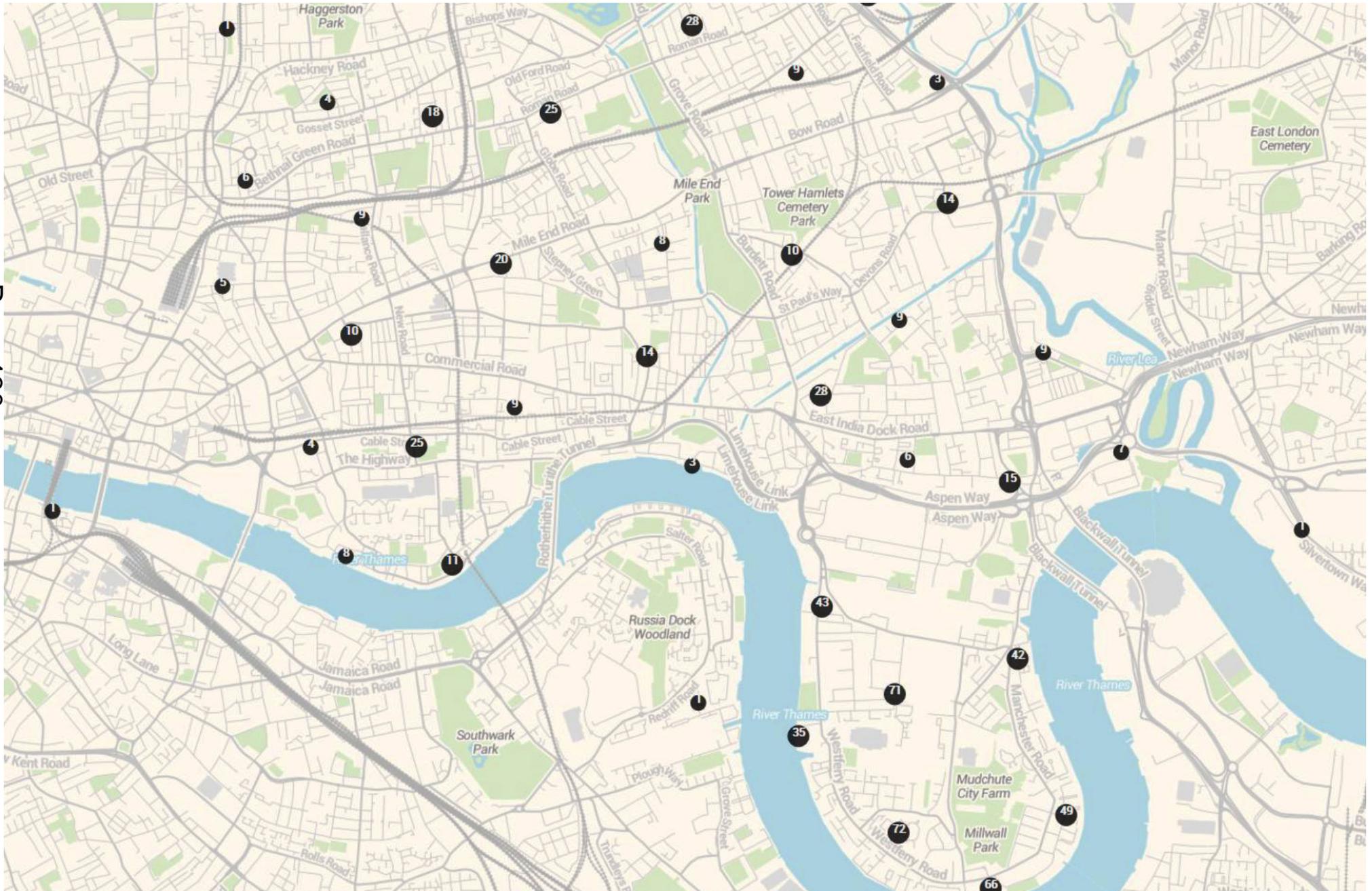
	The introduction will need to be backed by strong evidence of the positive effects seen in the trial i.e. fewer accidents, less congestion etc. I do not feel the introduction should be an ad-hoc investment that is overturned soon after. It should certainly not be a publicity stunt. I feel traffic calming measures need to be introduced in smaller streets but also maintained where damage is caused through wear.
415	Enforcement must be stepped up on main roads where cars and motorbikes routinely speed excessively. Especially near schools and residential homes.
	I believe 30mph is a low enough speed to protect all.
416	20 mph zones around places such as hospitals and schools are a sensible measure but to blanket cover a road is not. You are creating another opportunity for drivers to get confused with multiple speed limits and therefore fall foul of the law. Stop making drivers law breakers and revenue generators. Make rules less complex and more easy to understand. Its driver awareness that needs to be targeted not speed limits.
	The 20mph limit was added with very little consultation. It's proven to be dangerous with many near misses caused by frustrated drivers who are trying to drive at the national limit of 30mph. If the council wishes to understand this then try driving a few laps of the Isle of Dogs at 20mph and see what happens. It is
417	incredibly dangerous. Council ***wasted*** a lot of money putting in 20mph limit.
418	A 20mph limit is ridiculous, the roads are already too congested and a 20mph limit causes drivers to drive below not at this limit causing more problems and dangerous driving
419	I dice with death daily as a pedestrian, walking home from work. The 'boy racer' problem is terrible around Stepney Way, Ben Jonson Road and Harford Street. Traffic calming measures don't really work (and probably cause problems for emergency vehicles) which is why I feel speed cameras are the only effective option.
420	labour council will do as please and not care for residents of lbth
421	Roads where there are bike lanes and adequate crossings don't need a lower limit as more at-risk users are kept out of the way. Leman St is an example where lots of people cross the road and bikes have to mix with lorries, cars and parked cars so probably should have a lower limit.
422	The 20mph limit just makes sense and the stats support it. Let's just enforce it. Like the smoking ban.
	If the road design keeps pedestrians, scooters, bikes etc away from cars and lorries, then you don't need a 20mph limit, so Mile End Rd/Whitechapel Rd could have a 40mph limit. Leman Street though, which is tight with people crossing the road, falling out of pubs and bikes mixing with lorries, should be a lower limit as
423	it's a more hazardous street.
424	Please enforce the law. I don't see why drivers can break the law with impunity.
425	Near school only
426	It is not the normal drivers that are the issue - it's the few idiots that exist - and making it 20kmh doesn't stop them. More police visibility. Example today 2 motorbikes did burn outs then sped off c. 50mph opposite the forge where the other person died speeding on a bike.
427	understand the need for extra care on our roads, however, 20mph is just so slow that I find my attention wandering. I suspect that this applies to other drivers too
428	Restrict motor traffic in residential streets and prevent 'rat runs'. More permeable quiet routes that are cycle only.
429	Hi - I am a driver and while the 20mph speed limit has in some form helped me to refocus to lower speed limits, I often find people only slow down just before a speed camera to avoid a penalty which is more dangerous. Roads such as Cambridge Heath Road are more than adequate for 30mph.
	I live on the Isle of Dogs. Most drivers ignore the 20mph. I have been repeatedly over taken when observing the 20mph, this includes overtaking on Zebra Crossings. I am also fed up with being tail gated. One driver overtook me so closely
430	that he hit my car.
431	The 20mph speed limit is ridiculous. It means getting around Isle of Dogs and surrounding areas much longer and more inconvenient. It doesn't help also with ongoing roadworks taking up road space. It just causes more delays for people living and working in the area.
432	I am in favour of a 30mph limit being enforced in the IOD. Nobody obeys the 20mph limit, but if some of the boy racers could be stopped it would help.
433	Cyclists travelling from Canary Wharf along Westferry Road into Narrow Street treat it like a race track and it's become extremely dangerous for pedestrians trying to cross the junction at Westferry Docklands Light Railway Station/Salter Street to get access to the bus stop and to Milligan Street.
434	In one day I witnessed two accidents on Commercial Rd near the branch road turning, in very slow moving traffic. Bad drivers will be bad drivers at 60mph or 10mph. Reducing the speed limit isn't the solution.
435	Feel that main issue is the massive increase of heavy duty vehicles in the area. There is constant heavy good vehicles going non stop throughout the whole day. Would be better to have hgv only access on specific times this would remove the need for 20 mph speed limit
	20 mph is not necessary. Speed cameras are good enough for over 30mph. Stick with that. It's now dangerous as people slam on when cameras are seen. At 30mph it only reflected what most people did anyway so not a problem and not an unsafe speed.
436	20mph is too severe.
437	Mile End Road is a death trap. Fairfield Road is even worse. Please invest heavily in this area. People's lives are at risk every day. We need serious enforcement and we need it now.
	20 mph is safer for pedestrians especially children and cyclists
	the speed is far more important than cycle lanes
	We should be putting pedestrians and cyclists first and cars should drive carefully
438	too many are raced and there seems to be so little enforcement its a shame
	I am in favour of the 20mph in Tower Hamlets, HOWEVER, there are certain roads such as Cambridge Heath Rd where it just does not make sense, that road should be 30mph which I feel is more suited. I hardly see anyone sticking to the 20mph limit, and whenever I am driving through there, staying at 20mph other
439	drivers will be tailgating me. I feel 30mph in Cambridge Heath rd is more appropriate, same as with the other roads I have stated. Commercial Road and Whitechapel Rd should stay at 30mph. Bringing it down to 20 will cause chaos. Thank you.
440	20mph is not fuel efficient and makes motor vehicles produce more Co2 than travelling at 30mph.
	There is no visible enforcement at present. In particular around the Crisp Street/ Barchester Street area cars exceed the speed limit with impunity all day.
	There are no speed cameras, police presence or traffic calming measures.
441	Without any form of enforcement any speed limit is pointless.
	On Main Roads the speed Limit should Remain at 30MPH. Side roads 20MPH.
442	Why on 20MPH Main Roads are London Transport Buss's and Black Taxi's still speeding at 30MPH when Everyone else has to Stay at 20MPH? The Police have more than enough work to do, Why increase Police enforcement. When Camera Speeding tickets are sent out, (more revenue for the council) Road Rage Will occur.
443	I think it is such a good idea. However where I live it seems to be totally ignored by so many drivers. It is a residential area with many school. Some drivers seem to have put a one in front of the twenty! Especially concerning when children are coming out of school.
444	LOTS OF SCHOOLS IN THE MILE END AND BURDETT ROAD IN FACT ALL OF THE BOROUGH THE MAIN BEING COMMERCIAL ROAD AND BURDETT ROAD I AM WORRIED CONSTANTLY OF THE SPEEDS BY MOTORS AND BUSES.
445	the police should enforce speed limits at night in many parts of the borough.
	I live near preston road I have never ever seeing someone going 20 miles apart from driving schools on the contrary some drivers fly over to probably 60 when there is no traffic. There have been some serious accident. I cannot see the point of putting a 20 miles limit if there is nonlaw enforcement. The road is very
446	unsafe please donsomething about it before there will be more casualties!!!
	Speed limits by themselves won't change anything. It's far more important to educate drivers that they are sitting in a potential killer machine and that therefore they must take more care. Driver education should include watching out for cyclists, children and pedestrians, as well as what's called "defensive" driving.
447	Please, please opt for education over speed limits!
	Where there are sure roads with good protection through space or physical barriers then the 20 limit is unnecessary and frustrating and slows progress. Having said that there are many places where the 20 limit is helpful and justly increases safety. I don't agree with the blanket limit but suggest it could be the first expectation and then other things considered.we need drivers to think about how they are driving and thier speed not follow or ignore arbitrary limits. You also need to drive out of some situations ...not at high speed but just enough to avoid problems without the rear of a speeding ticket
448	c
	I believe a blanket coverage of the Borough is too Draconian and smacks of big brother tactics, but I certainly feel that a lot of the "side roads" could or should be kept at a 20MPH limit, it's these streets that the "boy racers" seem to ignore the speed limits due to lack of enforcement
449	There is a particular issue on Cleveland Way of drivers accelerating northbound towards bend, then braking. If areas were made access only, like parts of Hackney (or Netherlands for real model) maybe this would curb this racetrack behaviour
450	The problem with 20mph speed limits seems to be the lack of enforcement. Very few drivers actually stick to 20 unless there is a speed camera nearby. Needs to be better enforced.
451	Slowing traffic down just irritates drivers, when pushbikes can break the speed limits and cause accidents to happen with no consequences to the riders, also the slower the traffic is made to go the more drivers will break the speed limit and cause more road rage among other drivers. Vehicles are made to allow people
452	to reach their destination faster, so why try and make them slow down and cause more problems. Try penalizing the law breakers rather than the safe drivers.
	20 mph is ridiculous unless there is a special reason like a hospital on a main road. As a disabled person , I have to rely on taxis to get to the doctor and hospitals. This limit on isle of Dogs is increasing my cost of getting to the hospitals. Often there is nothing on the road ahead but I have to sit at a snails pace with the
453	meter running. I cannot get on a bicycle. Can we have limits on them and fines for going on pavement.
	The adverse consequences of the 20 mph being introduced are
	cyclists going faster than cars and constantly undertaking on the left hand side
	buses tailgating cars when they keep to the 20 mph limit
454	it has made travelling by road more dangerous and stressful for all users
	With reference to Trafalgar Way E14, which leads up to Canary Wharf, you almost feel there should be prize for the first person spotted actually doing 20mph along this road.
455	The speed limit is not observed and I would have thought 30 was adequate for here. Many cars go much faster. It makes a 20 limit ridiculous to be honest when it is honoured so extensively only in the breach.

	20mph limit leads to increased aggression from many drivers against those of us who are doing 20mph, with increased risk taking during overtaking and often excessive speed after overtaking (i.e. well above 30). Seeing more overtaking in hazardous areas than previously seen and more 'near misses' at crossings / blind junctions than experienced previously. Also seeing an increase in speeding in high-end cars down Limeharbour since the 20mph introduction, generally after they've been behind someone doing 20mph along Marsh Wall. I agree that 20mph makes sense on quiet residential roads, and wholeheartedly support it there, but on local primary roads such as Manchester Road, Westferry Road, Marsh Wall, Limeharbour etc it doesn't make sense and is just leading to increased aggression against those who are following the new limit, especially with the police not being willing to enforce the 20 limit, and increased risk to pedestrians with people more likely to overtake where they shouldn't and speed excessively after doing so.
456	When cycling I'm also finding that people aren't leaving as much room when overtaking me as they would have previously and are overtaking simply as they don't want to be behind a cyclist rather than because they need to (I'm generally doing 17/18 mph on my cycle and am keeping up with traffic). This often results in
457	The limit was slowed traffic down & seemingly not increased safety. 30 is better!
	As a cyclist I feel more unsafe in 20mph zones with cars unable to overtake me quickly and cleanly. As a motorist I have been subject to repeated 'road rage' incidents for travelling at the speed limit.
458	20 is unnecessarily slow for good roads and clear road conditions.
459	Use speed bumps closer to zebra crossing. Most drivers don't stop to give away to pedestrians!
460	The 20mph is not effective on the Isle Of Dogs. The careless drivers simply slow down for the couple of cameras and then speed up & engage in dangerous driving. The 30mph was effective and the traffic calming measures near the schools are adequate. Interestingly I have been driving at 19-20mph and have been overtaken by cyclists; do they get speeding tickets? I would employ more resources in policing dangerous driving particularly later in the evening.
461	In particular, tipper trucks are more often than not, driven very fast and dangerously with no respect for the mobility impaired, other pedestrians and those who cycle.
462	Ridiculous. And dangerous. Needs to be scrapped.
463	Cycle lanes need to have givey ways. Especially on one way roads and when turning left from major road to small road.
464	Stop being stupid and keeps all roads at 30mph
465	You need speed indicator signs to back this up and off-peak policing. e.g. Bow Common Lane to Devas Street/A12. Not so much a problem during peak hours as traffic speed is self-limiting.
466	having these 20mph limit is causing more traffic as well as accidents. People are getting frustrated driving at a ridiculous 20mph and start speeding and over taking other vehicles and causing traffic and accidents. keep it at 30mph and every one will be happy, less traffic, less accidents.
467	20mph zone are ridiculous and from experience it causes alot of agro as drivng at that speed is too slow. Even the police do not abode by it! Nlr does any other car drivers. Best to stick to 30mph.
468	Traffic in the borough & in London generally is slow, a 20mph limit is counter productive as it then in theory takes vehicles longer to reach their destination causing more pollution. Also , late at night/early morning there is even less justification for a 20mph limit as there a few pedestrians. Enforcement of a 20mph limit is expensive & ongoing whilst driver education is more cost effective.
469	Community Speed Watch should be encouraged and the evidence gathered used to prosecute motorists who speed and behave in an antisocial manner in other ways too.
	What you should concentrate on is driver education and awareness of parents parking outside of schools during drop off and pick up times, most of the times they double park even triple parking. They bring traffic to a standstill. It is a miracle that no children have been hurt. The enforcement penalties of parking on ZigZag lines should be a priority.
470	The 20 mile of hour does not work, as some cars still do 40/50mile an hour, what you need to do is bring back the 30 miles an hour limit and actually catch people that are going over that speed.
471	I have seen more accidents (fender benders) on the Island since the 20 mile an hour limit was brought in than in all my years of driving.
472	Please also give consideration to the streets around Whitechapel e.g. Varden St, Cavell St etc - these are literally used as a racetrack at night. Thanks
473	Continuing with the 20mph speed limit will just cause motorists to be more agitated along these routes...we spend more than enough time in congested traffic as it is, this imposed speed restriction just makes our journeys worse!
474	My concern is that any new 30 MPH limit clashes with the national limit making the new 20 MPH limit unenforceable. Please check this with the Metropolitan Police who are responsible for enforcement.
475	the driver need a robust training for improving their attitudes towards vulnerable people such as disable, elder people, people with buggy etc as most of the time driver don't intend to stop or slow while on the road.
476	I feel that the drivers in the borough that cant cycle to their destinations are being unduly penalized because of the actions of a few.
477	There are many drivers who ignore the speed limit whatever it is. The area around Stepney Green is a particular black spot in terms of dangerous, inconsiderate driving. I fear only police enforcement & heavy fines/penalty points will make some drivers slow down
	This experimental 20mph speed limit appears to have increased congestion, journey times and means that motorists are being overtaken by cyclists as well as undertaken. I am more worried about hitting a cyclist than I have ever been,
478	There are too many unregistered cars in Tower Hamlets, resulting in a number of vehicles still exceeding any speed limit by a serious level at night time.
479	f*** you and your f***ing speed limit. Theres no evidence that reducing the limit to 20 would make any difference and reduce serious injuries or deaths. It cos us drivers money and time which hurts the economy. Cars are less effecient at 20 than at 30 and with the added traffic the level of pollution goes up to. f*** you guys and f*** Lutfur Rahman.
	Whilst I can see the reasons for a 20mph limit, the reality is that few drivers observe the limit and only do so when passing speed cameras.
480	Sticking to the limit often leads to drivers behind flashing their lights and attempting to overtake or overtaking on roads where cars don't have enough room to overtake / are approaching blind corners, pedestrian crossings, etc.
481	Any advantages to safety by the lower speed limit would therefore seem to be reduced given: I) a lot of people ignore the limit; and II) it often results in cars overtaking one another in areas which are not designed for such overtaking.
482	A 20mph does nothing to deter those drivers who speed (and did so at the 30mph limit as well). Enforcement would help, traffic measures such as humps do not (the ones on Pennington St effectively bounce the lorries that speed over them creating additional noise and no reduction in speed). The imposition of 20mph is also poorly thought out as traffic rarely travels at this speed in the day and just imposes additional traffic noise to residents at night when they could proceed swiftly and safely through the area. This would also help air quality (which I believe to be the real reason behind so many poorly thought out strategies).
483	Enforcement is key - if there's no penalty for falling to observe a speed limit, drivers will continue to exceed it. However the biggest issue is excessive speed along Bow Road (A11) which I understand falls outside local authority jurisdiction.
484	20mph causes more pollution.
485	Police or traffic enforcers should work on school runs. Dangerous parking along Westferry Rd by Arnham Wharf, St Edmunds, harbinger twice daily. Also Cubitt Town School on Manchester Road for example. Double parking, parking soon yellow lines and zigzag seems far more dangerous in my opinion.
486	I strongly disagree with a blanket 20mph limit in urban areas. It causes drivers to become frustrated and/or careless and as a result is likely to increase car accidents rather than reduce.
487	More effort should be spent making roads safe (not covered in obstacles) and educating all road users including motor and pedal cyclists, and car users to be more aware of their surroundings.
488	Enforcement is also ludicrous. I was pulled over outside a school, on a 20mph road, for driving too slowly!
489	A 20mph speed limit will cause more congestion in the borough.
490	Nobody seems to take any notice of the 20mph limit and they carry on breaking the speed limit. I have never seen anyone being pulled over for this even though cars are speeding past me and even honking their horns for me to go faster. They use my road as a rat run from Globe Road to Bancroft Road and speed through here. I would like to see street humps put in place to stop this
491	We have a phenomenal public transport system, and further measures to discourage private vehicles are positive, and safe.
492	This is a ridiculous idea, it will end up causing more angry and frustrated drivers and will cause hate crime towards the borough of Tower Hamlets. I personally think 20 mph is too slow, to get from a to b without being late 20 mph is too slow.
493	Potentially, having a 20mph zone during daytime hours, while roads are busiest, reverting to 30mph after. e.g. 7pm?
494	Too many speed bumps and traffic calming in the borough. No need for this with 20 mph zones (if the zones are enforced). Suggest use of CCTV cars to aid enforcement. More enforcement generally specifically around schools.
495	All London roads should be as ne level as majority of the roads effect pupils cars which they paid for. There should be less road works on peak times as it causes a lot of traffic.

Appendix E LBTH postcode heatmap



Appendix E Ibth postcode markers



Cabinet Decision Wednesday 4 th February 2015	
Report of: Stephen Halsey Head of Paid Service and Corporate Director - CLC	Classification: Unrestricted
Boroughwide 20mph Limit	

Lead Member	Councillor Shahed Ali, Cabinet Member for Clean and Green
Originating Officer(s)	Margaret Cooper, Tom Rawlings
Wards affected	All Wards
Community Plan Theme	A Safe and Cohesive Community
Key Decision?	Yes

Executive Summary

All Local authorities have an obligation to manage and improve road safety. Urban and city authorities are increasingly bringing forward the application of 20mph zones to help moderate the speed of motor vehicles and reduce accident rates. Tower Hamlets, like most other London boroughs, seeks to address safety whilst dealing with increasing traffic volumes, increased use of cycling as a mode of transport, increased population and pedestrian levels and increasing amounts of commercial haulage during a period of unprecedented public sector spending reductions. In order to maintain the focus on safety the 2014/15 Strategic Plan (Priority 1.3) therefore includes a commitment to *Plan and develop proposals for a borough wide 20mph limit, including consultation with TfL*. This report sets out how these commitments can be delivered and reports on progress on work to date.

Recommendations:

The Mayor in Cabinet is recommended to:

1. Consider the responses received from public consultation on the proposed borough wide 20mph speed limit
2. Agree to proceed with the implementation of a 20mph limit on Borough roads pursuant to an experimental traffic order which shall take effect for a period not exceeding 18 months and authorise the Corporate Director Communities, Localities and Culture to approve all necessary experimental traffic orders under the Road Traffic Regulation Act 1984 to facilitate delivery and to take all steps incidental thereto including but not limited to publication and signage and carriageway markings.

1. REASONS FOR THE DECISIONS

- 1.1 Consistent with the objectives of the Mayor of Tower Hamlets, the 2014/15 Strategic Plan (Priority 1.3) includes a commitment to *Plan and develop proposals for a borough wide 20mph limit, including consultation with TfL*. This report confirms delegation of authority to officers to implement this commitment.
- 1.2 By implementing the limit the Council will introduce a consistent approach to managing vehicle speed across the Borough and will integrate with neighbouring boroughs who have or are planning to, implement their own default limit

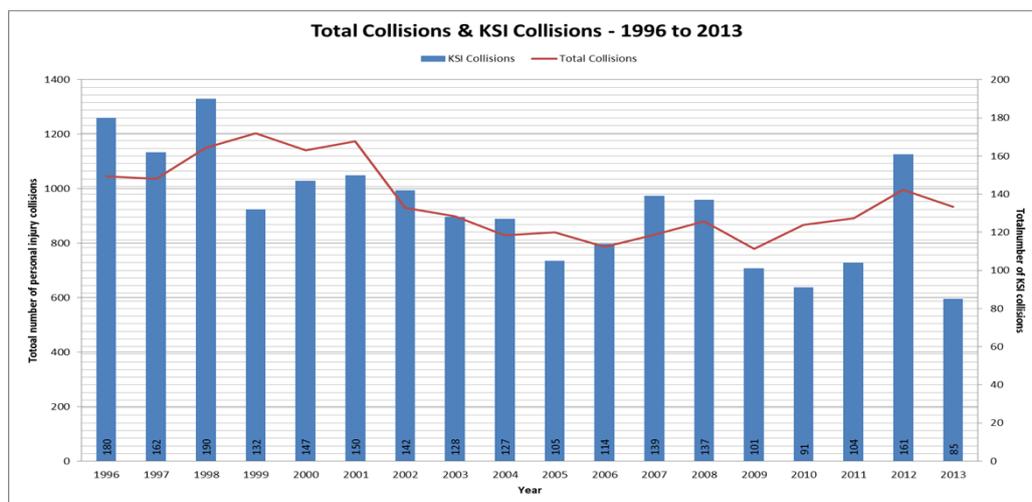
2. ALTERNATIVE OPTIONS

- 2.1 Do nothing. This is unlikely to be consistent with the Council's functions, as the Council has a duty to be proactively seeking to reduce road casualties and improve road safety.
- 2.2 To review current underperforming 20mph zones for further physical interventions. This approach would not have the same borough-wide impact on driving behaviour and such interventions could meet with local objections.
- 2.3 Introduce new 20mph zones in residential areas not already covered. This would also have less impact as these areas are of lower priority in terms of accident statistics, and local distributor roads would not be tackled which is where many accidents are occurring.

3. DETAILS OF REPORT

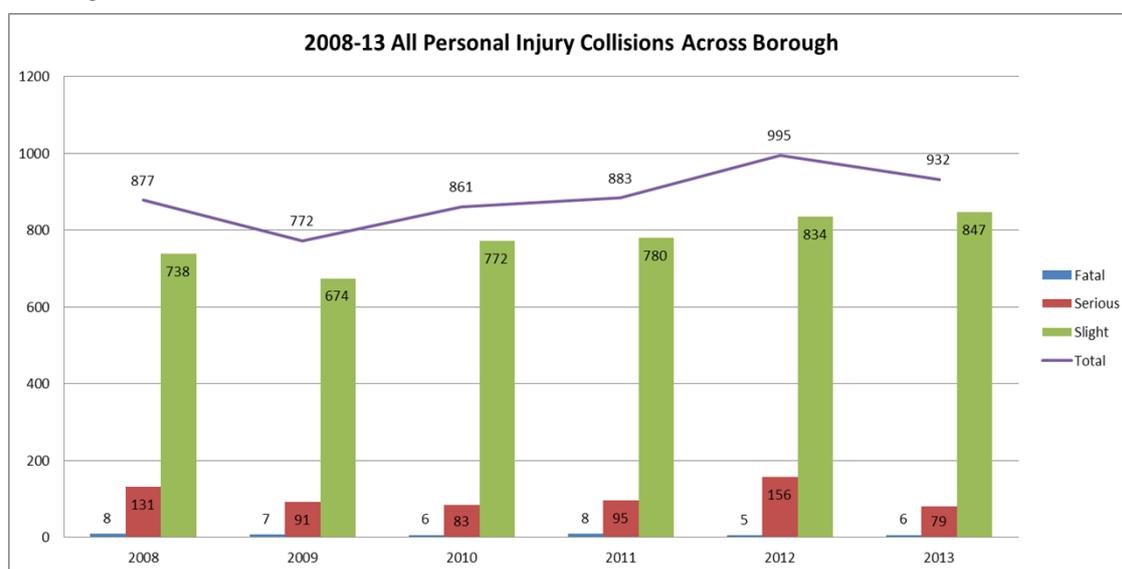
- 3.1 The Council pursues programmes of proactive measures to reduce accidents on borough roads and the Borough has been very successful in achieving a steady decrease in killed and seriously injured collisions (KSI's) since the late 1990's, albeit the results in 2012 have skewed the generally positive profile. This is clearly shown below in Figure 1.
- 3.2 2012 was dramatically different to the previous 3 years and analysis has shown this increase occurred in the summer months when the Olympic Road Network affected traffic movement throughout the borough. Since then, there has been a significant decline in collisions and 2013 saw an all-time low achieved for KSI's, but slight collisions remain stubbornly high.

Figure 1



3.3 Whilst we have done well in bringing down serious collisions, the total number of personal injury collisions within the Borough has been steadily increasing over time, and is closely correlated to the increasing population density and traffic volumes passing through the Borough. The increase in “slight” casualties is the predominant cause of this trend as shown in Figure 2 below.

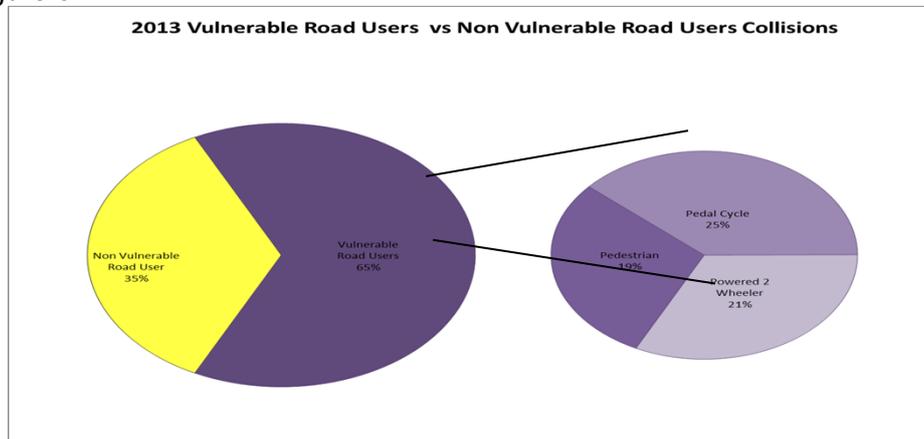
Figure 2



3.4 As well as statistical and factual data the Council also needs to be sensitive to public perception and areas of local concern regarding road safety risk. Analysis of Member’s Enquiries received by Transport & Highways over a 12 month period considered in the 2012 Road Safety Review noted that 25% specifically mentioned vehicle speed as a concern, whilst 69% of were actually related to vehicle speed in general. Vehicle speed is also important to schools and is often referenced in School Travel Plan reports.

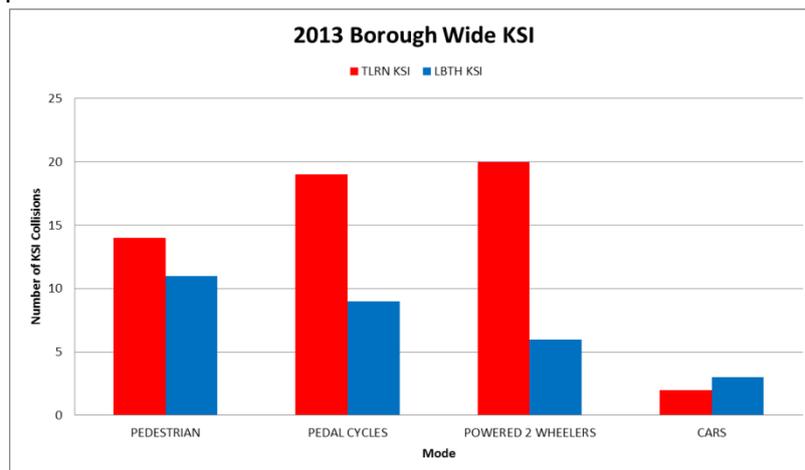
- 3.5 Further analysis of the 932 personal injury collisions in 2013 demonstrated that 65% of resulting casualties involved vulnerable road users: cyclists (254), pedestrians (192) and motor powered two wheelers (214) (see Figure 3 below). These groups would be the major beneficiaries of a reduction in average traffic speeds achievable through a 20mph limit.

Figure 3:



- 3.4 It is important to note that these statistics reflect accidents on all roads in the borough of which 29 km of the busiest are managed by Transport for London, as part of the Transport for London Road Network (TLRN). This compares to 280km of Borough roads. Of course, the TLRN carries the bulk of traffic through the borough and in 2013 two thirds of killed or serious collisions (KSI) took place on the TLRN. This is illustrated on Figure 4 below which also shows that vulnerable road users are more likely to be involved in a KSI collision on the TLRN compared to borough roads, thus justifying the inclusion of the TLRN within the Borough wide 20mph limit.

Figure 4



- 3.5 The Council has formally requested TfL's co-operation with this initiative and agreement to include the TLRN within the borough-wide 20mph limit, on all roads other than the A12 and Aspen Way. Officers are aware that currently TfL are monitoring the impact of a 20mph limit on two sections of the TLRN included experimentally within the City of London 20mph limit. TfL are also reviewing the case for other pilots following requests from several boroughs.

Initial discussions have indicated that TfL may be agreeable to including Commercial Street in this pilot in order to better understand the effectiveness of such speed limits on the TLRN. Discussions are also taking place about a 20mph limit on the A11 as part of the CSH2 design review. It is unlikely that other TLRN routes would be included in the 20mph limit initially.

- 3.6 The Police have previously been cautious in their support of such limits given the limited resources they have available for speed enforcement. However they have carried out speed surveys on a number of sections of the TLRN in the borough and indicated their support for the inclusion of certain TLRN roads near the central area in a 20 mph limit, which is extremely positive.

4. 20mph Limit in Tower Hamlets

- 4.1 The Department for Transport (DfT) publication 'Setting Local Speed Limits' states that the standard speed limit in urban areas is 30 mph, which represents a balance between mobility and safety factors. However, for residential streets and other town and city streets with high pedestrian and cyclist movement, local authorities are encouraged to consider the use of 20 mph limits. There is clear evidence of the benefits of lowering traffic speeds on the reduction of collisions and casualties, as the collision rate is reduced at lower speeds; and if they do occur, there is a lower risk of fatal injury. Other significant benefits of 20 mph limits include quality of life and community advantages that encourage healthier and more sustainable transport usage such as walking and cycling. Based on this positive effect on road safety, and a generally favourable reception from local residents, traffic authorities are able, and encouraged by the DfT, to use their power to introduce 20 mph speed limits or zones.
- 4.2 Successful 20 mph zones and 20 mph speed limits should be self-enforcing, i.e. the existing conditions of the road together with measures such as traffic calming or signing, publicity and information as part of the scheme, lead to a mean traffic speed compliant with the speed limit. To achieve compliance there should be no expectation on the police to provide additional enforcement beyond their routine activity, unless this has been explicitly agreed.
- 4.3 Speed is only one of many causes that contribute to traffic collisions. However, a reduction in vehicle speeds in the majority of residential areas would, over time, reduce the number and severity of collisions. Early studies of existing sign-only 20 mph speed limit schemes find that they generally produce an average reduction in speed of between 1 and 1.5mph. The associated reduction in collision rates is dependant to a degree on the average 'before' speeds.
- 4.4 Approximately 85% of the Borough is currently within local 20mph zones: the majority of these zones have experienced a reduction in the total number of casualties of up to 70% since implementation although 4 have experienced an increase in those killed or seriously injured (Weavers, Campbell, Narrow and

Antill zones). Traffic calming measures in these zones are to be reviewed to design out further risk.

- 4.5 As the benefits of 20 mph limits are clearly demonstrated, and the need for reducing casualties in Tower Hamlets is shown to be justified, it is now proposed that all roads for which Tower Hamlets is traffic authority, will have a default speed of 20mph, and that limit will be extended to those areas of the TLRN which TfL approve (provisionally Commercial Street and a section of the A11).
- 4.6 The more consistent application of a 20mph speed limit through the borough should reinforce existing zones and produce additional benefits on the busier roads which would be included for the first time. This proposal would therefore drive progress towards reducing casualties still further. Average journey speeds in Inner London are on average less than 15mph due to the delays incurred at junctions being the primary factor in journey time. A slower speed limit would therefore not impact unduly on journey time.

5 Implementation

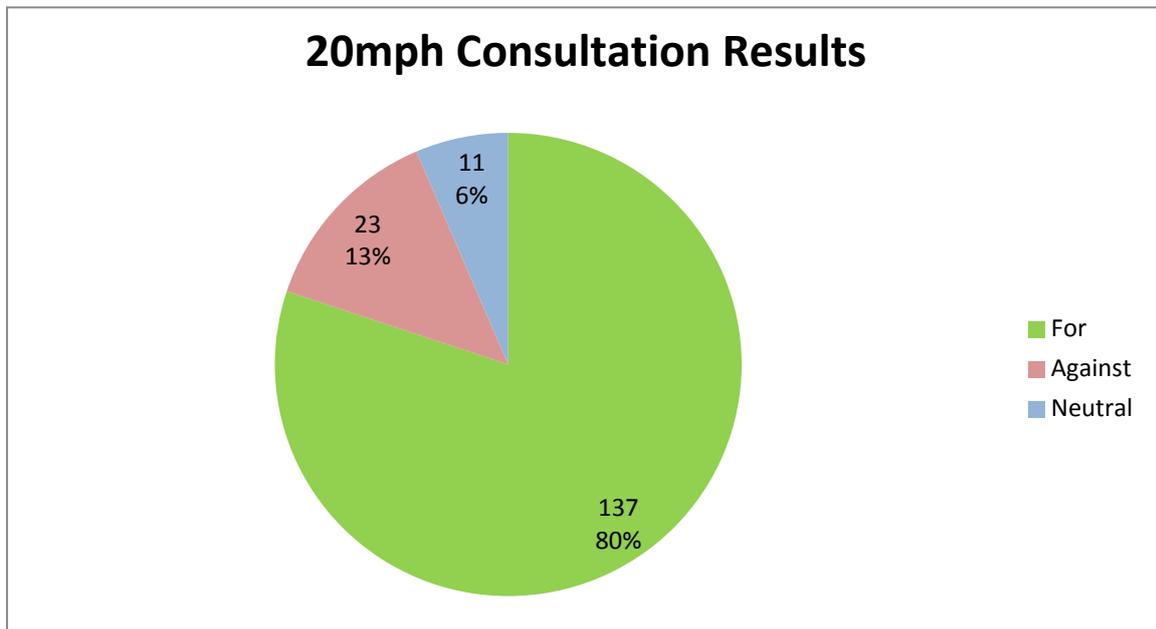
- 5.1 The introduction of a borough wide speed limit is a significant move which complements similar initiatives in Islington, City of London and other boroughs and has strong support from the Twenty's Plenty campaign and cyclists' groups. The timetable for approval, consultation and works implementation is set out below.

Stage	Sept	Oct	Nov	Dec	Jan	Feb	Mar
Reports	DMT 4/9; CMT 16/9					CAB 4/2	
Consultation		Public: East End Life, Website and Twitter Direct mail to Stakeholder groups 6/10 for 6 weeks		Awareness: Schools art Competition for signage	Statutory experimental notices		Awareness raising to continue into 2015/16
Works							28/2 for 2 months
Go Live							1 st April

6 Consultation :

- 6.1 In order to raise awareness amongst residents and drivers of the proposed Borough-wide 20mph speed limit, informal public consultation was carried out to set out the justification for the initiative and gauge opinion on the principle of such a scheme. This initially included an article in East End Life, on the website and a press release and will continue with further awareness initiatives over the coming months. The text of this article is included in the Consultation Report in Appendix One. A number of organisations were also directly consulted (as detailed in Appendix One) including but not limited to the Emergency Services, Neighbouring Boroughs, Local Business Groups and Transport for London.

6.2 A more detailed report on the responses received during the consultation is attached as Appendix One. In total the council received 171 responses to the consultation, as follows:



This figure includes 103 (60%) resulting from an on-line campaign organised by Tower Hamlets Wheelers (the local branch of London Cycling Campaign).

6.3 Key responses were received from Transport for London and the Metropolitan Police. :

- TfL are planning a trial of 20mph limits on Red Routes to assess their effectiveness and have indicated that they would include Commercial Street in this pilot to complement the borough-wide initiative. The results of that pilot would inform any future extension of 20 mph limits on the TfL road network.
- The Metropolitan Police, who retain responsibility for speed enforcement, stressed that “speed enforcement is expensive; it is both time and resource intensive and competes with other important policing issues of equal public concern at a time of significantly reduced police budgets.” They made it clear that “there should be no expectation on the part of Tower Hamlets Council that the MPS will provide any additional general enforcement following implementation of a borough wide 20 mph limit. Enforcement must be seen as mainly reactive and should not be seen as a preventative measure to achieve the traffic speeds desired. This will only be achieved by public support and compliance by the majority. This compliance will only be achieved where there are sufficient interventions, in terms of signage and/or traffic calming, to make the 20mph limit obvious to visiting motorists.” However, the MPS have indicated their support for the objective in principle and have engaged constructively in the development of the detail of the scheme.

6.4 As the commitment to implement the project is established, a borough-wide schools competition has been launched through the Junior Road Safety

Officers, to design 20 mph signs. This will increase the penetration of awareness raising into the wider family.

- 6.5 There will then need to be a further round of awareness raising publicity to alert residents and drivers to the Go-Live date and encourage compliance. This could include Variable Message Signs on major routes and the Council's advertising portals.

Works:

- 6.6 There is a standard package of works which are required to establish a 20mph zone which predominantly consists of signs and lines:
- A pair of unlit '20' speed limit (with 30 on the reverse) signs at each entry point along with 20 / 30 carriageway markings
 - Small 20 roundel road markings spaced at regular intervals within the area so that a marking / sign is visible from any point on the road.
 - Associated Traffic Regulation Orders
 - Additional traffic calming would be required in locations where current speeds are high, within existing 20mph zones where personal injury collisions have risen and within areas where existing calming is poor or missing
- 6.7 It is proposed to introduce the 20 mph limit by way of an Experimental Traffic Order under Section 9 of the Road Traffic Regulation Act 1984. An Experimental Traffic Order is a legal order that is required to try out a new highways scheme within the Borough. This can last up to 18 months and while it is in force impacts can be monitored and assessed (and further changes made if necessary) before the Council makes a final decision on whether or not to continue the Order on a permanent basis. 18 months will provide time for a full year of analysis of collision statistics and vehicle speeds to be reviewed to determine the effective of the speed limit. A formal consultation is required with the emergency services and other statutory bodies before the Order is made (for example the AA, the RAC, Spokes, CTC, the Pedestrian Association, the Freight Transport Association, the Road Haulage Association) and a notice of proposal is published in the local paper prior to the commencement of the experimental order. Comments and issues arising during the experimental period can be considered further during the experimental period prior to a final decision on whether to make the order permanent being made approximately 3 months before the end of the experimental period. A report will be brought back to Cabinet at this time with a recommendation as to whether the order should be made permanent.

Costs and Funding

- 6.8 The estimated cost of signing and lining for a single junction is approximately £1,000. The total number of junctions requiring signing is dependent on which TLRN routes are included in the proposal, but the maximum budget necessary for this element of work would be £220,000.

- 6.9 20mph limit repeater roundel signs will be required to be painted in the carriageway which is estimated to cost a further £180,000.
- 6.10 Together with consultation, design and traffic order making (approx. £50000) the maximum total cost of implementing a borough wide 20mph speed limit is therefore estimated to be £450,000 and can be wholly funded through the TfL LIP allocation (over a two year period). TfL have actively encouraged the use of LIP funding for such initiatives. £376,000 is currently approved in the CLC 2014/15 Capital Programme for road safety which includes other committed schemes as well as the first phase of delivery of the 20 mph limit.

7. COMMENTS OF THE CHIEF FINANCE OFFICER

- 7.1 The report provides justification for the implementation of a borough wide 20mph speed limit on Borough roads by April 2015. Implementing the proposals is estimated to cost between £280,000 and £500,000. The maximum cost of the signage will be dependent on the TLRN routes included in the proposal by TfL and are estimated to cost up to £220,000.
- 7.2 There is provision within the 2014/15 Capital Programme road safety TfL LIP allocation to fund up to £376,000. The recommended phased approach to implementation will ensure that further works will be commissioned from the funding provision available for the 2015/16 TfL LIP allocation.

8. LEGAL COMMENTS

- 8.1 The Council is a traffic authority for the purpose of the Road Traffic Regulation Act 1984 (“**RTRA**”) and has a duty to exercise its functions under that Act to secure expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians). So far as practicable, the Council must have regard to the following matters when carrying out its functions under the Act –
- the desirability of securing and maintaining reasonable access to premises;
 - the effect on the amenities of any locality affected and the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run;
 - the strategy prepared under section 80 of the Environment Act 1995 (national air quality strategy);
 - the importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles; and
 - any other matters appearing to the Council to be relevant.
- 8.2 The Council should also take into account its own overarching policies, set out in the Local Transport Plan.

- 8.3 Section 84(1) and (2) of the RTRA empowers Councils acting as local traffic authorities to make speed limit orders on roads within its area. Orders which the Council is empowered to make under section 84(1) can be made initially by way of an experimental traffic order under section 9 of the RTRA as is proposed here. An experimental traffic order can take effect for any period less than 18 months.
- 8.4 Having carried out consultation it is for a local traffic authority acting reasonably and taking all relevant considerations into account to determine whether a speed limit is appropriate for an area, having regard to national guidance issued by the Department for Transport. The consent of the Secretary of State is not required for a 20mph speed limit order.
- 8.5 The consultation should comply with the following criteria: (1) it should be at a time when proposals are still at a formative stage; (2) the Council must give sufficient reasons for any proposal to permit intelligent consideration and response; (3) adequate time must be given for consideration and response; and (4) the product of consultation must be conscientiously taken into account. The duty to act fairly applies and this may require a greater deal of specificity when consulting people who are economically disadvantaged. It may require inviting and considering views about possible alternatives. It is noted that whilst no statutory consultation is required prior to making an experimental traffic order there is a general duty on the Council to do so. It is considered that the consultation carried out complies with the necessary criteria set out above. There will be a further opportunity for comments on the proposals to be made once the notice of making of the order has been published. Any representations received at this stage will need to be taken into account when the Council decides whether or not to make a permanent order.
- 8.6 Such orders must comply with the procedural requirements set out in the Road Traffic Regulation Act 1984 (Amendment) Order 1999 and the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 ("the Regulations"). In respect of an experimental traffic order the Council must give notice of the making of the order within 14 days of the date on which the order is made by publishing a notice containing the information specified in the Regulations in the local newspaper and in the London Gazette. An experimental traffic order cannot come into force before the expiration of the period of seven days beginning with the day on which the notice of making in relation to the order is first published.
- 8.7 As well as publishing the notice of making, the Council are also required to take such other steps as it considers appropriate for ensuring that adequate publicity is given to the making of the order. Further the Council are required to comply with the requirements of the Regulations in respect of the deposit of documents relating to the experimental order and these are to be made available for public inspection from the time that the advertisement is first published until the order ceases to have effect.

8.8 Under Section 85 of the RTRA, it is the duty of the traffic authority to erect and maintain prescribed speed limit signs on their roads in accordance with the Secretary of State's directions. The Traffic Signs Regulations and General Directions 2002 prescribe the designs and conditions of use for traffic signs, including speed limit signing.

8.9 When deciding whether or not to proceed with the proposals, the Council must have due regard to the need to eliminate unlawful conduct under the Equality Act 2010, the need to advance equality of opportunity and the need to foster good relations between persons who share a protected characteristic and those who don't (the public sector equality duty). To inform the Council in discharging this duty an Equality Analysis has been completed and a copy is attached to this report.

9. ONE TOWER HAMLETS CONSIDERATIONS

9.1 This proposal seeks to provide road safety benefits to all residents of the borough, with particularly positive impacts demonstrated for vulnerable road users including the elderly, young children, cyclists, pedestrians and mobility impaired people. An Integrated Equality Assessment was undertaken on the schemes proposed in the Local Implementation Plan which included the strategy for reducing road accidents. A further Equality Analysis specific to this project was also carried and is attached hereto. This confirmed the general level of benefit.

10. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

10.1 Reducing traffic speed and making streets safer for vulnerable users will encourage increased walking and cycling, supporting the promotion of sustainable modes of transport.

11. RISK MANAGEMENT IMPLICATIONS

11.1 In order to minimise financial risk, no expenditure will be incurred without confirmation of allocations being approved by TfL. All works will be programmed and managed as per existing LIP funded programs and contracting procedures (see 11. below).

11.2 The proposal specifically aims to reduce road safety risk.

12. CRIME AND DISORDER REDUCTION IMPLICATIONS

12.1 LIP guidance requires schemes to take into consideration the Council's duties under Sn17 of the Crime & Disorder Act. Many complaints received about speeding traffic are found to relate to other anti-social behaviour. Thus a positive benefit on such behaviour can be anticipated from reducing traffic speeds.

13. EFFICIENCY STATEMENT

- 13.1 All works will be delivered through Contract CLC 4371 which commenced on October 1st 2014 after an extensive competitive tendering process. This contract includes 4 Lots for highway maintenance, capital improvements, street lighting maintenance and street lighting improvements.
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Linked Reports, Appendices and Background Documents

Linked Report

- NONE

Appendices

- 20mph Public Consultation Response
- Equality Analysis Quality Assurance checklist
- Equality Analysis

Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012

- NONE

Officer contact details for documents : Tom Rawlings x 6704

<p>Cabinet</p> <p>September 2016</p>	
<p>Report of: Debbie Jones</p>	<p>Classification: Unrestricted</p>
<p>Social Impact Bond: Pan-London Care Impact Partnership</p>	

Lead Member	Councillor Saunders, Deputy Mayor and Cabinet Member for Education & Children's Services
Originating Officer(s)	Kate Bingham
Wards affected	All
Key Decision?	Yes
Community Plan Theme	A healthy and supportive community

Executive Summary

Tower Hamlets Children's Services has been working with the Greater London Authority and five other London Boroughs – Bexley, Hillingdon, Merton, Newham and Sutton - to develop a social impact bond (SIB) funded service to prevent adolescents entering the care system. The service will work with families to keep young people out of care using the well- established Multi-Systemic and Functional Family Therapy methodologies. Benefits of the edge of care SIB will include;

- New services to help young people and their families stay together, rather than the young person entering the care system
- Better outcomes for young people, as there is evidence that young people who enter the care system later in their life as teenagers suffer particularly poor outcomes
- Net financial savings, after the cost of the service is taken into account
- A leading role in a leading edge project - the first social impact bond across multiple council areas in the country. Hence a project which will have a national profile and fits well with our desire to be more 'outward looking

This report seeks approval for Tower Hamlets to act as the lead commissioner for the Pan-London Care Impact Partnership and to enter into an outcome based contract to deliver early intervention services for adolescents on the edge of care.

Recommendations:

The Mayor in Cabinet is recommended to::

1. Authorise the Corporate Director of Children's Services to act as the lead commissioner for the Pan-London Care Impact Partnership.

2. Authorise the Corporate Director of Children's Services to enter into a contract with the Social Impact Bond provider to support young people and their families in Tower Hamlets.
3. Following consultation with the Corporate Director for Children's Services, authorise the Service Head - Legal Services to execute all necessary contract documents in respect of the awards of the Pan-London Care Impact Partnership and an outcomes based contract on behalf of Tower Hamlets.

1. REASONS FOR THE DECISIONS

- 1.1 Tower Hamlets has a particularly high proportion of adolescents who enter the care system, suffering poor outcomes and with a high financial cost. The average unit cost per week for a child in care for two years is £1,529. The Council identified the need to look at preventative work to avoid care entry for adolescents as part of its analysis of financial pressures in children and adults services. In May 2014 the Greater London Authority (GLA) brought together a group of London boroughs to consider opportunities for collaboration to improve outcomes for adolescents on the edge of care. The aim of the project was to introduce a range of evidence-based "edge of care/ in-care" interventions across London and establish a more flexible outcomes-based commissioning model that can scale up across London over time by using a tariff based on reduced care entry/reduced care costs.
- 1.2 In the context of rising numbers of Looked after Children (LAC) and significant budgetary pressures for all local authorities, the GLA commissioned Social Finance to work with the six London Boroughs to explore the opportunity of using a "pay for outcomes" approach to enable London Boroughs to access specialist services that prevent or reduce care entry for vulnerable young people. This development project was funded by the Big Lottery and Cabinet Office Commissioning Better Outcomes Fund. It provided the opportunity to apply for further funding from the Big Lottery Fund which would subsidise the Boroughs' payments for positive outcomes should the services be commissioned.
- 1.3 The Pan-London edge of care services platform will be supported by social investment. Social investment would fund the setup and delivery of specialist intensive prevention services – Multi-Systemic Therapy (MST) and Functional Family Therapy (FFT) – that are currently hard to access for London Boroughs on a stand-alone basis. The platform will set up and subcontract the services and each Borough will access the capacity that would meet its local needs. In almost all London Boroughs, the local need falls substantially short of the capacity of a full service team.
- 1.4 It is envisaged that each Borough will commit to an outcomes contract with the central platform, therefore avoiding complex co-commissioning agreements. It is anticipated that Boroughs will agree a minimum volume

expectation of eligible cases that will be referred to the services, with the platform bearing co-ordination, capacity and implementation risk.

2. ALTERNATIVE OPTIONS

- 2.1 The Social Impact Bond provides investment, that would not otherwise be available, to address social problems and fund preventative interventions. As such, this project presents an opportunity to provide support to reduce the strain on acute services.
- 2.2 It would not be financially viable for Tower Hamlets to commission either MST or FFT in isolation. We would be unable to generate the level of referrals required to meet designated caseload set out within the models licence. The Pan-London Care Impact Partnerships provides economies of scale that will attract high quality providers across London.
- 2.3 The project will be subsidised by a grant provided by the Big Lottery Fund. This will contribute to 14.8% of our outcomes payments. This funding would not be available outside of the Pan-London programme.

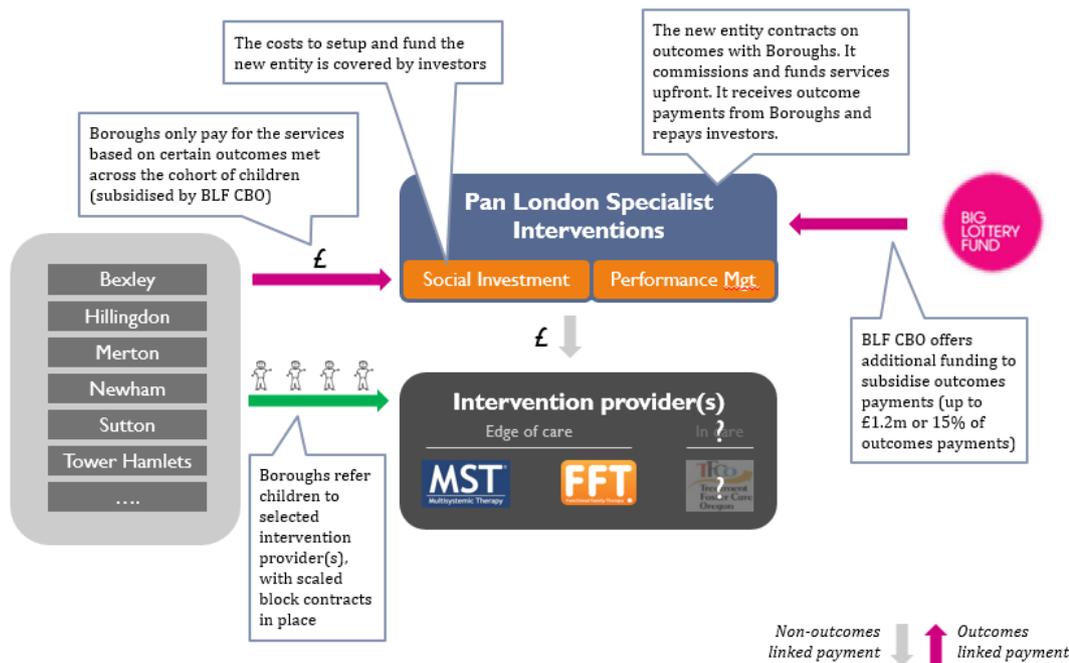
3. DETAILS OF REPORT

- 3.1 Social Impact Bonds provide an innovative approach to attracting additional funding through social investment. The SIB would allow residents to access an invaluable early help offer that would not be available without this mechanism. The SIB represents a contingent liability and is dependent on the outcome of future events.
- 3.2 Over the 6 year project contract, Tower Hamlets stands to realise £1.4m in net savings. This is as a result of a total of 69 young people receiving services over 3 years, which lead to improved outcomes and reduced time in care placements and avoidance of ancillary costs (e.g. care leaving costs).
- 3.3 Additional savings can be realised by the Borough beyond the timeframe of the 6 year contract term. This is as a result of young people benefitting from the programme, whose care journeys would otherwise have continued over subsequent years. A total saving of £2m could accrue to Tower Hamlets over this extended time frame.
- 3.4 The prospect of acting as the lead commissioner for this joint project is a fantastic opportunity for the council. SIBs offer a new model of funding and delivery that could be applied across the council. As lead commissioner, Tower Hamlets would acquire valuable experience of delivering this new model of local government delivery. The Pan-London Care Impact Partnership has agreed to reimburse the council for any cost associated with the procurement of the SIB. Funding was also secured through the Big Lottery Fund to support this project and will further reduce any perceived risk to the council.

- 3.5 An application was made to the Big lottery Fund (BLF), Commissioning Better Outcomes and the Social Outcomes Fund, on the 24th March 2016. This application was approved in principle on the 12th May 2016 and the BLF intends to award the project £1.5m to support the Pan-London programme. The grant will provide as a subsidy for the outcome payment only and will support 14.8% of all outcome payments in Tower Hamlets. It is envisaged that the council will benefit from £185K in subsidised outcome payments during the life of the project.

Social Impact Bonds

- 3.6 A SIB is a financial mechanism in which investors pay for a set of interventions to improve a social outcome that is of social and financial interest to a commissioner. If the social outcome improves, the commissioner repays the investors for their initial investment plus a return for the financial risks they took. If the social outcomes are not achieved, the investors stand to lose their investment.
- 3.7 The outcome metrics form the foundation of the SIB contract between the public sector and investors. All stakeholders need to trust that there is an objective mechanism for assessing and agreeing the degree to which social outcomes have been achieved. Such a metric might need to be linked to cashable savings on the part of the public sector commissioner. Whether suitable metrics can be identified is a key determinant of whether or not a SIB is the appropriate instrument for addressing an identified social issue.
- 3.8 The SIB will be financed by social investors, such as Charitable Trusts and Foundations. Social investment has been shown to bring social and economic benefits. There is, however, an expectation of financial repayment and the Pan-London SIB is based on a clear evidence based intervention that will offer a level of reassurance to the investor. Social investment is different from more traditional financial investment and involves weighing the social and financial returns of investments in different ways. This can mean accepting lower financial returns if the social impact is greater. Social Impact Bonds enable social ventures to access finance to grow and achieve greater social impact.
- 3.9 The diagram below illustrates how the SIB platform will operate within the Pan-London Edge of Care Project.



The Intervention: MST and FFT

- 3.10 We know that adolescents often enter care during a crisis – with their family, with the police or with their mental or emotional health. They experience a larger number of placements, a more disrupted experience of care, poorer outcomes in education and are at increased risk of struggling when they leave care.
- 3.11 The proposed project will provide an early intervention programme to support adolescents on the edge of care. This will improve outcomes for the adolescent young person and reduce the high cost associated with children and young people being in care. As an early intervention programme, this approach which offers a real opportunity to improve outcomes for children and young people and make long-term savings. The reduction in care costs will inevitably reduce pressure on the council's budget.
- MST and FFT will complement existing services available in the boroughs and offer a more specialist and intensive response to families where adolescents are at risk of care entry. These services work directly with young people and their families to strengthen relationships, improve communication and enable conflict resolution. While both these services originate in the US and are licenced models, they have been implemented in the UK and elsewhere internationally over the past 15 years. Intensive treatment for families with young people who display chronic, persistent challenging behaviours and who are at risk of out of home placement.
 - Strengths based approaches aimed at improving family functioning and communication in complex families and empowering parents.

- Application of effective, well-tested therapeutic techniques to empower both parents and young people to change their relationship.
- A focus on creating sustainable change.

3.12 As evidence based interventions MST and FFT require a defined structure that the Council would not be able to support independently, the Pan-London SIB provides an opportunity for economy of scale and access to additional financial investment to support the investment. The SIB provides the funding mechanism so that we are only paying if the service delivers improved outcomes and a reduction in the number of days this cohort is in care.

Good practice in Commissioning Social Impact Bonds

3.13 SIBs are currently being used in Essex County Council and Manchester City Council. Essex CC did not offer Multi-Systemic Therapies (MST) service prior to the implementation of the SIB. This funding structure offered Essex the opportunity to target investment into a preventative intervention to support a group with complex needs which, more often than not, placed a great strain on the care system, and in doing so deliver direct financial savings.

3.14 An interim report published by Essex CC highlighted findings from a stakeholder survey and interviews that indicated that the SIB structure had impacted on many aspects of implementation of MST in Essex. Areas where it has had the most impact included: the referral pathway and processes; project governance and oversight; and the information and monitoring requirements. The report did not identify any evidence to suggest that the delivery of MST through the SIB added any significant value in terms of outcomes or performance. What the data does show is descriptive evidence of where the SIB structure added value to the process of MST delivery, which may in turn lead to improved outcomes. The areas of added value to date are:

- The continual engagement of SIB investors, beyond the initial investment
- The investment of MST in the programme's success, including the rigorous quality assurance and willingness to address challenges flexibly
- The security offered by the SIB funding to MST therapists
- A rigorous information and reporting system, focused on outcomes

Inter-Borough Agreement

3.15 The Council's Legal Service has developed an agreement to control the relationship between the different councils throughout the process of tendering. This includes forming a steering group which will have decision making power as to the final shape of the tender. However, it is unclear at this stage how the final contracts with the SIB provider will work as between the councils themselves.

3.16 It is most likely that each council will have their own contract with the SIB provider although it is possible that Tower Hamlets could contract on behalf of

the other councils. In any event, a further agreement (also known as an Access Agreement) will be entered into between the Councils to govern the contracting relationship. The commitment from Tower Hamlets under the current agreement is only to run the procurement and in any event, beyond the responsibility to procure correctly Tower Hamlets has and will have no resultant liability for the delivery of SIB related services in other council areas.

Role of the Lead Commissioner and resource Implications

- 3.17 As lead commissioner for the project there will be an additional resource implication. Children's Commissioning will coordinate the development of the SIB specification on behalf of the six local authorities. Additional legal support will be required to support the establishment of the Special Purpose Vehicle, which will hold the SIB together and provide a performance management function. Legal Services will also develop an individual outcomes contract on behalf of Tower Hamlets, which will be adapted by other boroughs for their own purposes. A Pan-London agreement has been produced that makes provision for all costs to be reimbursed once the SIB has been established.
- 3.18 The role of the Lead Commissioner is set out within the Pan London Care Impact Partnership Agreement. As Lead Commissioner we will provide to the Boroughs:
- Commissioning and project management support provided by Children's Commissioning. This will ensure that the necessary and appropriate resources are available to undertake these tasks.
 - Procurement expertise including (but not exclusively) advice relating to the nature of an appropriate procurement route, access to electronic tendering services and other associated procurement related services and
 - Legal advice including (but not exclusively) advice relating to the procurement approach, drafting of the terms and conditions, in tender queries, and other associated legal related services.
- 3.19 Members of the Pan-London Edge of Care Partnership have agreed to reimburse Tower Hamlets for all reasonable costs. This will be, set out within the Pan-London Care Impact Partnership agreement, and an upfront payment of £17K will be requested. This payment will cover project management, procurement and legal costs.

Potential Savings

- 3.20 Analysis provided by Social Finance suggests there are 30 cases p.a. in Tower Hamlets, eligible for MST or FFT, with the business case below showing potential savings if only 23 children were referred p.a.
- 3.21 It is proposed that the services are delivered in each Borough for 3 years. A 6 month set up phase is required and a 2 year run-off tracking period once the last young person has received services. Interventions run for 3-5 months.

Therefore the contract term is 6 years. The business case below is based on the 6 year horizon.

- 3.22 The table below illustrated the level of savings that can be achieved. In order to calculate the net savings available, outcome payments that the Borough will make to the platform, are deducted from the gross savings and the Big Lottery Fund subsidy is added back in.

£000	Component of business case	69 young people	Comments
	Gross savings over life of project	£2,500k	Savings correspond to reduced care placements costs
-	Cost of outcomes payments	£1,252k	£500/young person who completes the therapy £215 per week out of care/at home
+	Big Lottery Fund subsidy to outcomes payments	£185k	14.8% of outcomes payment
=	Net savings over project period	£1,433k	
+	Additional savings after project period	£534k	To capture savings from residual care journeys avoided, that extend beyond the project time horizon of 6 years
=	Total net savings	£1,968k	

4. COMMENTS OF THE CHIEF FINANCE OFFICER

- 4.1 Tower Hamlets Council (LBTH) has been assigned as the lead authority to undertake the procurement process for the SIB project. LBTH will incur additional costs in order to undertake this process. The conditions of the Big Lottery Fund Grant relate solely to outcome payments and do not allow for administrative costs; therefore an agreement in principle has been made, whereby all 6 Boroughs will contribute equally towards the cost of the procurement process. This contribution would total c£100,000 and will be set at a level sufficient to cover LBTH's costs. However this has yet to be confirmed in writing with all parties concerned and therefore presents itself as a potential unfunded risk to LBTH.
- 4.2 The suggested format for the contract lends itself to that of a framework agreement between the 6 Boroughs (Commissioners) and the supplier. At this early stage financial risks around the contract remain unclear, until the finer details around the structure of the contract have been finalised. This would include risks around de minimis referrals over the length of the contract and participants joining/exiting the framework.
- 4.3 As the SIB is outcomes based, it would appear to offer the Council a relatively low risk opportunity to exercise an option which potentially provides long term added value to the client and yield long term savings. Where Outcomes are

not achieved, the cost of each referral to the council is circa £500 (a total of £34,500 if all 69 referrals were to fail during the course of the contract).

- 4.4 The funding required for successful outcomes payments have been identified within Children's Social Care.
- 4.5 The SIB is estimated to yield net savings of £1.4m over the 6 year contract period, through improved outcomes and reduced time in care placements and avoidance of ancillary costs (e.g. care leaving costs). Additional potential savings of £500k to take the overall savings to £2m may also be realised beyond the 6 year timeframe as a result of young people benefitting from the programme, whose care provisions would otherwise have continued over a number of years. However it will be difficult to materially ascertain the longer term tangible savings the treatment has contributed beyond the 6 year period.
- 4.6 It is unclear whether the net financial savings arising as a result of the proposed approach in this report represent cashable savings or opportunity savings i.e. the avoidance of resources that would otherwise be required. In either case the benefits from this approach needs to be properly reflected in the Council's MTFs in a way that Members can be assured of the actual impacts should this proposal be agreed.

5. LEGAL COMMENTS

- 5.1 The Council has an obligation as a best value authority under section 3 of the Local Government Act 1999 to "make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness". This obligation extends to the purchase of all goods works and services. The Council meets this obligation by subjecting purchases to the appropriate level of competition.
- 5.2 The Council is obligated by the Public Contracts Regulations 2015 to submit certain procurements to advertising and methods of procurement in accordance with these regulations. However, these services are of the type that fall into Schedule 3 of the regulations which means that whilst the regulations still apply the formalities of the procurements are less stringent
- 5.3 In respect of Schedule 3 services the regulations only apply to a procurement that has a value greater than £584,000. However, this contracting opportunity is the value of the purchase aggregated across all the Boroughs involved (albeit the Council's resultant contract will be only in respect of purchases made by this Council) and therefore the Public Contracts Regulations will apply to this contract.
- 5.4 Schedule 3 services' procurements are only subject to a "light touch regime". This means that the procurement can be quite flexible in approach. However, the process that is devised for the procurement must still be fair open and transparent,. This should be considered when determining matters such time for response, evaluation criteria, evaluation methodology etc.

- 5.5 In order to satisfy the Best Value duty in accordance with Section 3 Local Government Act 1999 as detailed above, the Council must ensure that it awards the contract on the Most Economically Advantageous Tender basis. This means awarding to the provider in that has attained the best score on a blend of quality and price and in accordance with the advertised evaluation criteria.
- 5.6 The Council is acting as lead authority in respect of this Procurement. It is therefore undertaking the procurement process on behalf of the other participating boroughs.
- 5.7 The Council is seeking to enter into an agreement to govern the arrangements between the boroughs for the purposes of running this procurement process. This agreement is intended to govern such issues as information sharing, setting up of a project steering group, responsibility for sharing procurement costs, and procuring responsibilities. In the main however, this Council is responsible for the procurement and in particular ensuring that the contract is procured correctly in line with the governing law. It is notable however, that this is an identical risk to the one which the Council would take if the Council were procuring on its own behalf only. This is because the intention is to procure something for this Council following which the other Boroughs can then enter into their own separate identical agreements with the winning bidder. Therefore, aside for a greater aggregated cost all factors for this Council are the same as if it were procuring only on its own behalf.
- 5.8 However, in order for the Procurement to be successful it is necessary to ensure prior to the commencement of the procurement that all the boroughs are committed to a minimum value of spend so that the estimated value of the Procurement is realistic and savings are realised across all the boroughs based on the increased volume of all the boroughs purchasing together.
- 5.9 It is anticipated that the winning bidder will be a consortium of 1 or 2 service providers and an organisation that is willing to bear the upfront cost of setting up the services. Soft market testing has shown that such organisations exist and are likely to be social enterprises whose purposes are those to further the assistance of care in sectors such as this one.
- 5.10 However, managing all the contracts together would be burdensome for the Council. Therefore, it is suggested that the winning consortium would set up a company for the purposes of delivering the services and the Council would then only have to manage the one contract.
- 5.11 The Council may also consider entering into separate agreements with each member of the consortium (called collateral warranties) to ensure that in the event of a claim the Council could seek redress against the particular consortium member through such an agreement as it is likely that the set up company will have very little in the way of its own financial substance.
- 5.12 Throughout the contract period the Council will make payments for the services. However, the nature of the contract will be such that the Council will

only be obliged to make payments against successful outcomes. Therefore, the limitation on the Council's risk is twofold. It does not have to take the risk of successfully setting up a new innovative service which may bear something in the way of initial problems but will also only pay against measured and delivered successes.

- 5.13 The Council has been successful in winning a grant to support these services from the Big Lottery Fund. The nature of the grant is that the grant can be used to subsidise each payment that is to be made by the Council until such time as the grant has been fully utilised. This also removes some of the risk from the Council. However, the Council must ensure that the Contractor understands the obligations placed upon the Council by the Big Lottery Fund to ensure that there is continuing access to the grant funds. Also and to this extent, obligations similar contractual grant obligations placed on the Council by the Big Lottery (such as information collection, sharing and reporting) must also be included in the winning bidder's contract.
- 5.14 It is notable that the Big Lottery have suggested to the Council that it should not use the funding to directly cover the Council's costs of procuring these services. However, it would be commercially acceptable for the social enterprise funder to bear these costs also which would amortise the costs into the success based payments paid by the Council.

6. ONE TOWER HAMLETS CONSIDERATIONS

- 6.1 This project will mostly benefit people from a particular age group. The Edge of Care Social Investment Platform assumes that a cohort of 11-16 year olds, who on average have a 65% likelihood of care entry, will receive such services.

7. BEST VALUE (BV) IMPLICATIONS

- 7.1 The economic benefits of Early Intervention are clear, and consistently demonstrate good returns on investment. Intervening later is more costly, and often cannot achieve the results that Early Intervention is able to deliver.
- 7.2 Social Finance has provided assurance through our business care that the identified savings are realistic and can be achieved within timescales. The cost of the average care journey for 11-16 year olds has been calculated as part of the development of the project. The cohort has been defined on the basis of need codes that correspond to eligibility for MST and FFT services. This analysis has drawn on historic data that was available over the 12 year period 2003 – 2015. It has tracked care journeys over time and by placement type. By applying unit costs for placements, an average cost of care journey has been calculated.
- 7.3 The volume of eligible cases for this specialist edge of care services has been estimated, based on historic care entry and need codes. For Tower Hamlets, it is estimated that 30 young people per annum would be eligible for these

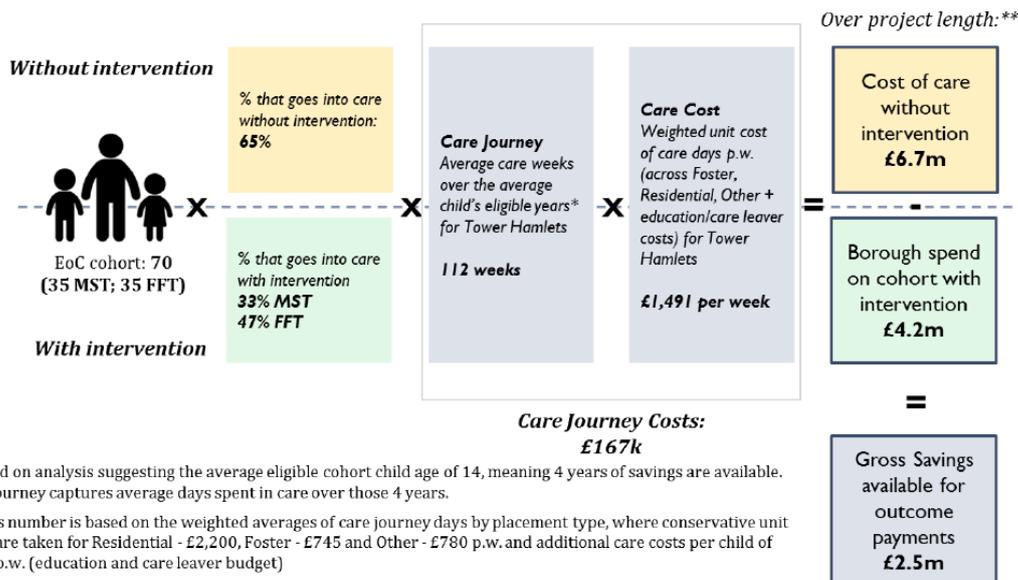
services, but for the purposes of analysis a more cautious estimate of 23 have been used.

7.4 The following assumptions have been made for Tower Hamlets:

- The average 11-16 year-old, eligible for MST/FFT, that enters care in Tower Hamlets will accumulate 2.2 years in care over their remaining childhood (on avg. 4 remaining years) incurring placement costs of £167k.
- The cost of an MST intervention is on average ~£15k per family.
- The Edge of Care Social Investment Platform assumes that a cohort of 11-16 year olds, who on average have a 65% likelihood of care entry, will receive such services.

7.5 Service success rates ranging from ~35-50%, generate gross savings of c. £2.5m, significantly better life chances, keeping the family together and an improved focus on engagement with school and the wider community.

7.6 The chart below illustrates the benefits of the project to Tower Hamlets.



* Based on analysis suggesting the average eligible cohort child age of 14, meaning 4 years of savings are available. This journey captures average days spent in care over those 4 years.

** This number is based on the weighted averages of care journey days by placement type, where conservative unit costs are taken for Residential - £2,200, Foster - £745 and Other - £780 p.w. and additional care costs per child of £148 p.w. (education and care leaver budget)

¹ Actual costs/savings for the child will be greater and would equal to: EoC cohort size x % of going into care x Care journey length x Care Cost. However, since the project ends before the last child's full potential finishes (until the turn 18), savings are shown for this relevant project period only (5.5 years)

Note: Small discrepancies might arise due to rounding of numbers

8. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

8.1 The proposals in the report will not contribute to a sustainable environment and will not have any environmental implications.

9. RISK MANAGEMENT IMPLICATIONS

9.1 All boroughs were asked to approve a Business Case for the purposes of the Big Lottery Fund application. There is a risk, however, that one or more borough will withdraw from the project at any stage.

- 9.2 Both MST and FFT are licenced interventions, with a defined structure and professional case load. On current volume assumptions, the initial group of six Boroughs will have access to two MST teams and one FFT team, offering a total capacity each year of 150 cases. Should an authority withdraw from the programme, the structure of the interventions would need to be reviewed.
- 9.3 To mitigate this during the procurement process, Legal Services have designed and circulated an inter-borough Agreement. This Agreement is intended only to govern the relationship between the Boroughs for the purposes of agreeing the appropriate methodology to bring this matter to tender stage, including the development of the appropriate tender documentation.
- 9.4 It is anticipated that further agreements will be executed between the parties to govern the contractual relationship between the Boroughs prior to executing contracts with the winning social impact bond provider.

10. CRIME AND DISORDER REDUCTION IMPLICATIONS

- 10.1 The primary outcome and payments of the proposed SIB are based on care prevention, but wider outcomes reflecting education, offending and emotional wellbeing can be tracked. We know that adolescents often enter care during a crisis – with their family, with the police or with their mental or emotional health. This project will enable the council to introduce both MST and FFT, which would not be possible without the SIB.
- 10.2 Studies of MST have shown a 75% reduction in violent offending against a control group 4 years after treatment a 54% reduction in arrests 13 years after treatment and a 50% reduction in out-of-home placement. Other studies show that MST has reduced out-of-home placements by 47-64 per cent, improved family functioning, decreased substance use and reduced mental health problems for youth. In addition, a 22-year follow-up study by the Missouri Delinquency Project showed that MST's positive results are sustained over long periods of time.
- 10.3 Studies of FFT have shown a 50% reduction in recidivism, a 77% reduction in referrals to foster care and improvements in school performance and attendance for 60% of young people.

11. SAFEGUARDING IMPLICATIONS

- 11.1 It is a priority of the Edge of Care Platform (MST/FFT) to ensure that a regular flow of suitable cases are referred to the services. Good working relationships are required with the Boroughs' social workers to facilitate this. The Platform Programme Manager and Supervisors will attend Borough panels which consider cases at risk of care or in need of intensive support. It is envisaged that in Tower Hamlets, referrals will be made by the Entry to Care Panel.

11.2 The Programme Manager, in conjunction with Supervisors will allocate the case to the most appropriate service. The therapist will work closely with the allocated Social Worker throughout the treatment period to ensure close communications and sharing of relevant information.

Linked Reports, Appendices and Background Documents

Linked Report

- None

Appendices

- None

Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012

- None

Officer contact details for documents:

Wesley Hedger - Commissioning Manager, Children's Commissioning

<p>Cabinet Decision</p> <p>6 September 2016</p>	
<p>Report of: Aman Dalvi, Corporate Director, Development and Renewal</p>	<p>Classification: Unrestricted</p>
<p>Procurement of Cleaning and Associated Services Contract</p>	

Lead Member	Councillor David Edgar, Cabinet Member for Resources
Originating Officer(s)	Samantha Raishbrook, Interim Head of Facilities Management
Wards affected	All Wards
Key Decision?	Yes
Community Plan Theme	One Tower Hamlets

Executive Summary

This report sets out the proposed contracting approach for the re-procurement of the cleaning and associated services contracts to serve the council’s future requirements. These arrangements take into consideration the wide scope of daily, specialist and reactive cleaning services that are required. Services are required across a diverse property portfolio that requires a standard output specification whilst still delivering services tailored to meet individual stakeholder needs.

The contracting approach seeks to secure a service provider who will enter into a sustainable partnership with the council. The service provider will need to be able to adapt the scale of their services in line with the council’s asset management strategy as the number of properties will vary over the life of the contract. The service provider will need to continue to provide a consistent management approach and structure. The contractual relationship will need to span the planning, implementation and move phases of the civic centre project; including the as yet unscoped short-term/temporary accommodation requirements and arrangements that may be needed during the project.

This report also seeks a short extension to the existing contract of two months in order to undertake a compliant procurement exercise and effectively mobilise the service.

Recommendations:

The Mayor in Cabinet is recommended to:

1. authorise the re-procurement and subsequent awarding of a cleaning and associated services contract for a term of five years with the option to extend for a further year based on service provision, subject to best value considerations being satisfied
2. authorise a two month extension to the existing contract arrangement to enable the re-procured contract to commence on 3 July 2017.
3. note that funding for the procurement exercise is through the General Fund revenue accounts across the various Council services
4. delegate authority to the Corporate Director of Development and Renewal following consultation with the Lead Member to enter into all necessary agreements to give effect to the decisions in recommendations 1 and 2
5. authorise the Service Head – Legal Services after consultation with the Corporate Director of Development and Renewal to execute and enter into all necessary agreements

1. REASONS FOR THE DECISIONS

- 1.1 Tower Hamlets is both an employer and a service provider. As an employer, the council's Corporate Property & Capital Delivery Service provides accommodation for over 5,000 employees across a number of administrative buildings. As a provider of services the Corporate Property & Capital Delivery Service supports a range of departments and stakeholders who operate from the council's estate.
- 1.2 The council has a statutory requirement to provide a safe clean working environment for employees, a commitment to maintain its assets and an obligation to stakeholders to provide cleaning services for buildings for which the Corporate Property & Capital Delivery Service is responsible. These cleaning services are needed to be adaptive to different forms of building use and service provision, as well as being able to respond to changes in such provision.
- 1.3 The project to reprocure the new contract is slightly delayed due to a lack of available resources being available at the required time. While the development of the new specification has now commenced, the time now available to publish, evaluate, award and mobilise this service will require a short-term contract extension of two months to 29 June 2017.

2. ALTERNATIVE OPTIONS

- 2.1 The council could require each department to individually procure and manage a cleaning and associated services contract for the buildings and facilities they occupy and use. However, this would likely result in increased overall costs with a lack of accountability for services with an increased risk of compliance failures due to a lack of management control. It will also fail to secure the economies of scale that could be achieved with one overall council-wide contract.

3. DETAILS OF REPORT

3.1 Background

- 3.2 The current contract was awarded to Wetton Ltd on 30 April 2012 for a three-year period with the possibility of two one-year extensions. Both of those options for an extension were exercised by the council and the contract is now due to come to an end on 29 April 2017. This report seeks a further short-term

extension of two months to 2 July 2017 in order that new contractual arrangements can be put in place while service provision is maintained. The cost of the extension is estimated to be approximately £0.363m, 90% of which is to be met from the Corporate Landlord budget and further 10% is to be recharged directly to services. The estimated spend over the life of this contract is £7.2m.

3.3 The contract is broken down into five lots, these include

- Administrative sites
- Children's Centres
- Libraries and Idea Stores
- Window Cleaning
- Sanitary Services

3.4 The profile of fixed spend over the life of the contract and estimated spend over the short-term extension are as follows:

Period	Fixed spend	No. of sites	No. of sites added	No. of sites omitted
Year 1 30/04/2012 - 31/03/2013	£1,329,049	76	12	8
Year 2 01/04/2013 - 31/03/2014	£1,291,817	78	6	4
Year 3 01/04/2014 - 01/03/2015	£1,390,170	82	4	0
Year 4 01/04/2015 - 31/03/2016	£1,388,443	83	1	0
Year 5 01/04/2016 - 31/03/2017	£1,452,625 (estimated)	87	6	2
Contract Extension 01/04/2017 – 28/06/2017	£363,156 (estimated)	87	0	0
TOTAL	£7,215,260			

3.5 The contract has a schedule of rates to include additional work and specialist cleaning ie. graffiti removal or reactive biohazard cleans which are categorised as variable spend.

- 3.6 The profile of variable spend over the life of the contract and that projected for the remainder of the term and the short extension are as follows:

Period	Variable spend amount
Year 1	£7,902
Year 2	£9,407
Year 3	£16,247
Year 4	£27,428
Year 5	£21,000 (Estimated)
Extension	£1,000 (Estimated)
Total	£82,984

- 3.7 The value of these works has increased the total contract value to £7.2 million over the life of the contract.

- 3.8 In addition to fixed and variable costs each site currently has an ability to order additional consumable items. This is unregulated spend which is mainly cleaning consumables. This spend is in addition to the above and is recorded over the past five years (and projected for the remainder of the contract term and short extension) as follows:

Period	Consumables spend amount
Year 1	£190,100
Year 2	£198,040
Year 3	£213,930
Year 4	£227,270
Year 5	£235,000 (Estimated)
Extension	£40,000 (Estimated)
Total	£1,104,340

- 3.9 Additional spend on cleaning services within the council which has been contracted outwith the main contract is also identified as follows:

Period	Variable spend amount
Year 5	£258,075 (Estimated)
Extension	£43,010 (Estimated)
Total	£301,085

- 3.10 This additional annual spend is based on actual monthly recharges on Agresso which have been estimated to year end.

3.11 Contracting Approach

- 3.12 There is a requirement to re-procure the existing contract for cleaning and associated services. This contract is an ongoing requirement and related to arrangements that have been reviewed/consolidated for some years.
- 3.13 There is a requirement to award the contract on the expiry of the existing contract with an anticipated start date of 3 July 2017. The new contract is expected to be awarded for a 5-year term with the option for a one-year extension based on successful delivery of a number of key performance indicators. The indicative value of the new contract is expected to be approximately £11.1 million based on consolidating all existing fixed, variable, unregulated and consumable spend identified.
- 3.14 The contractor will provide daily cleaning services to the council's portfolio of over 80 buildings, with buildings added and removed from the contract based on changes to the council's estate. Due to the move to the council's new civic centre (circa 2021), there is a requirement for the contract to incorporate mechanisms that mitigate as many risks as possible associated with the delivery of services throughout the planning, implementing and move phases of the project.
- 3.15 The value of this contract is anticipated to be approximately £11.1 million. In accordance with council procedures, a contract of this size and complexity would require a well established, robust service provider with a strong supply chain and turnover in excess of £20 million. There do not appear to be any such companies registered, located or based in the borough.
- 3.16 The contract will be tendered in accordance with EU procurement regulations in the form of a restricted tender in two stages. The first stage will be pre-qualification questionnaires that allow the production of a short list of four to six bidders who will then be invited to tender. These tenders will be evaluated on criteria designed to identify the most economically advantageous offer based on a combination of the quality of the vendor's solution (60%) and price (40%).
- 3.17 The scope of services will be driven by the requirements of the council's service area. In order to ensure that this contract is fit for purpose a high level of stakeholder engagement will take place to ensure that requirements are captured and described accurately as outputs within the specification.
- 3.18 The contract will provide for an annual renegotiation based on the requirement to pay the London Living Wage (LLW) and an annual index-linked increase. The annual index has not yet been identified but could be limited to increases in council budgets or related to an external index such as the Consumer Price

Index (CPI). The LLW is announced in October each year and employers have six months within which to implement the increase. Annual increases will be applied from April each year.

- 3.19 The contract will cover a period of high activity in relation to changes in property use, disposals and the inclusion of additional properties – particularly, but not limited to, the new civic centre. The variation clause will need to provide for flexibility by incorporating a standard variation clause to add/remove properties and services at short notice.
- 3.20 The pricing model must be able to provide a cost which is directly attributable to each building while remaining robust enough to ensure that the management and supervisory elements of the contract are adequately apportioned.
- 3.21 A performance measurement model is to be developed to meet the council's expectations for service and value. Performance Indicators (PIs) and Key Performance Indicators (KPIs) will be developed in consultation with key stakeholders and will be relied on in determining when the one-year contract extension option is exercised.
- 3.22 The contract will provide for a schedule of rates to include additional work and emergency responses.
- 3.23 **Goods and Services to be Procured**
- 3.24 The scope of requirement is expected to cover but not be limited to;
- Daily Office Cleaning
 - Reactive Cleaning Service
 - Emergency Response
 - Graffiti Removal
 - Bio Hazard – Body Spills
 - Periodic and Specialist Cleaning
 - Stone and Marble Cleaning
 - Carpet Cleaning
 - Internal and External Window Cleaning
 - Feminine Hygiene
 - Air Fresheners
 - Clinical Waste and Disposal
 - Consumables

4. COMMENTS OF THE CHIEF FINANCE OFFICER

- 4.1 It is a requirement of the Council's constitution that "The contracting strategy and/or award of any contract for goods or services with an estimated value exceeding £250,000, and any contract for capital works with an estimated value exceeding £5,000,000, shall be approved by Cabinet in accordance with the Procurement Procedures".
- 4.3 The current contract for the cleaning of the Council's various property assets commenced on 30th April 2012, and with the two one-year extensions options being agreed, the contract ends on 29th April 2017. It is proposed that a two month extension to 2 July 2017 is approved in order that all procurement timescales can be met.
- 4.4 The contract will be let in accordance with all relevant procurement procedures. The indicative value of the contract over the five years plus possible one-year extension period is £11.1 million based on the consolidation of the various items of cleaning expenditure (see paragraph 3.15). The contract will include a standard variation clause which will enable buildings to be added or removed as necessary – this flexibility is important during the review of property assets that will be necessary as part of the council's relocation to the new civic centre in Whitechapel.
- 4.5 The approved budgets for cleaning services are held within existing General Fund revenue accounts across the various council services. The cost of £363k arising from this extension will be met from the existing service provision. In addition, elements are charged to the Housing Revenue Account (via a service level agreement with Tower Hamlets Homes) and various trading accounts. On completion of the procurement process the existing budgetary provision will need to be reviewed to ensure that it reflects the new rates, and that any growth or savings that arise are incorporated into the Council's medium term financial plan; however given the need for the Council to deliver significant savings over the MTFS period (2017 – 2020) it is imperative that this key contract contributes to those savings requirements. Flexible terms to allow for changes in the scope of the buildings covered over the course of the contract; actions to limit price indexation allowances as much as possible and robust procurement to ensure that initial rates deliver value for money are all important considerations
- 4.6 It is also important that specific consideration is given to scoping the contract such that it can contribute to the Council's MTFS savings targets and included in the package of proposals considered by the Council through the current budget setting process.

5. LEGAL COMMENTS

- 5.1 This report concerns a proposal to initiate a competitive tendering exercise for cleaning services and extend the current contract to enable the procurement timescales to be completed (the Services).

- 5.2 The Council has power to enter into a contract for a third party to deliver the Services which arises by virtue of section 111 of the Local Government Act 1972, providing the power enabling the Council to do anything which is calculated to facilitate, or is conducive or incidental to, the discharge of any of its functions. Under section 1 of the Localism Act 2011, the Council has the power 'to do anything that an individual may do' 'for the benefit of the authority, its area or persons resident or present in its area'. The Council may be satisfied that it has the enabling power(s) to initiate a procurement exercise for the Services and award any subsequent contracts pursuant to that competition.
- 5.3 The subject matter of the Services falls within the description of Part 2 of the Public Contracts Regulations 2015 (Regulations) and the estimated value of the contract (circa, £11,100.000) exceeds the relevant threshold contained in the Regulations. In view of this the Council is required to fully comply with the Regulations and to subject the contract to a level of competition to ensure compliance with the principles of transparency and equal treatment. In addition, the Council would be required to place an advert in the Official Journal of the European Union (OJEU) together with a further notice in the OJEU when a contract is awarded, amongst other things.
- 5.4 The Council's procurement procedures (Procedures) require that for this type and value of procurement, the "tollgate" process is followed and it would appear from the information provided that those relevant requirements have been complied with to date.
- 5.5 The current contract for the Services requires a three month extension to enable the procurement exercise to be concluded and as such, would likely be regarded as a 'direct contract award' which could expose the Council to legal proceedings in respect of that illegality. In particular, a claim might be brought by an organisation claiming damages in respect of the lost opportunity and an application to have any direct award contract annulled. A decision of the Council not to procure the Services may also lead to allegations that the Council is failing to comply with European law in relation to public procurement, particularly principles such as equal treatment and transparency and non-discrimination under the Treaty on the Functioning of the European Union. This may expose the Council to scrutiny from the Cabinet Office and further, to the imposition of financial penalties by the European Commission. If the Council decided not to procure the Services and engage a different contractor to carry out work to satisfy its statutory duties, this would also likely be regarded as a direct contract award and expose the Council to the risks highlighted in this paragraph.
- 5.6 Directly awarding the contract would require a specific waiver of the Council's Procedures and the Council should be satisfied that one of the grounds for waiving them under section 12 of the Procedures is acceptable. The ground which could be relied upon is 12.1(a) of the Procedures which states that a waiver is permissible where "the nature of the market for the works to be carried out or the supplies or services to be provided has been

investigated and has demonstrated that only a single source of supply is available, or it is otherwise clearly in the Council's interest to do so”.

5.7 Reasons are provided in the report as to why it may be considered appropriate to deviate from the Council's Procedures, which may be summarised as follows:

- the Council has conducted preparatory work and intends to conduct public procurement as quickly as possible from the date of any Cabinet approval;
- the Council is obligated to continue to provide services in accordance with its statutory functions and it would be undesirable for no or significantly disrupted services to be provided until the new procurement has been completed and may in certain circumstances lead to the Council breaching other statutory obligations;
- it would be disproportionate and unviable to conduct a competition for three months' worth of Services provision; and
- it is arguably in the Council's best interests to extend the current contract so as to align the timescales for the award of a new contract under the intended procurement exercise.

5.8 There is a risk of challenge to the proposed contract awards for alleged non-compliance with the duties outlined in 5.5 and 5.7 above. The risk is lessened as the Council has, arguably, a pragmatic reason for requiring the short term contract and has some basis, by reason of the preparatory steps taken, that it is not the Council's long term intention to avoid competition. The Council should note that a 'new' contract is awarded to the organisation in an attempt to limit the measure of potential damages payable for the duration proposed and the contract ought to be aligned with the award of contracts under the intended procurement exercise.

5.9 The Council is required by the Public Services (Social Value) Act 2012 to consider how its procurement activities might secure the improvement of the economic, social and environmental well-being of Tower Hamlets. At the time of awarding any contracts when the procurement exercise is concluded, the Council should be satisfied that due regard has been given to these duties.

5.10 The Council has an obligation as a best value authority under section 3 of the Local Government Act 1999 to “make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness.” Compliance by the Council with its own Procedures in tendering for the Services and complying with the requirements of the Regulations should assist to satisfy these requirements. However, the Council would also need to be satisfied that entering into a contract at the conclusion of the procurement exercise would represent best value.

5.11 When considering its approach to contracting, the Council must have due regard to the need to eliminate unlawful conduct under the Equality Act 2010, the need to advance equality of opportunity and the need to foster good

relations between persons who share a protected characteristic and those who do not (the public sector equality duty). Officers are expected to continuously consider, at every stage, the way in which procurements conducted and contracts awarded satisfy the requirements of the public sector equality duty. This includes, where appropriate, completing an equality impact assessment which should be proportionate to the function in question and its potential impacts.

6. ONE TOWER HAMLETS CONSIDERATIONS

- 6.1 The services included within the scope of the contract will be universally provided across various types of properties throughout the borough. The current contract for the provision of cleaning and associated services has allowed service areas to purchase on a 'wants', rather than 'needs' basis. This has resulted in enhanced service levels in some parts of the council's estate and subsequently, increased costs. The service specifications for the new contracts will be delivered according to the needs of the service area and therefore a consistent service level will be set. This service specification will account for different types of services that may be delivered from the buildings, recognising that, for example, libraries, offices and children's centres will require slightly different cleaning services.
- 6.2 In selecting a contractor to deliver the contract, consideration will be given to the community benefits that they may offer. This information will be sought as part of the Invitation to Tender document. These could include:
- a. Potential to encourage apprenticeship schemes;
 - b. Employment of a local workforce;
 - c. Positively encouraging tender submissions from suppliers with good records for training and skills development;
 - d. Payment of London Living Wage (LLW);
 - e. Adding stimulus to the local economy, e.g. by way of a local supply chain;
 - f. The attraction of local SMEs by the provision of sub-contractors, for example, Window Cleaning and Sanitary Services. The contract terms will state that the profit margins on these services are to be shared appropriately with those sub-contractors.

7. BEST VALUE (BV) IMPLICATIONS

- 7.1 At the time the current contract was awarded in 2012 individual council departments held responsibility for the specification of their own cleaning requirements. This led to a wide variety of specifications and performance monitoring systems being put in place. This multitude of arrangements were centralised, but not harmonised, when the council consolidated its property

and facilities management service. This consolidated model was implemented in October 2015.

- 7.2 This procurement exercise provides an opportunity to benchmark services, ensure that the council's spend is effectively managed and that the new service provides ongoing value for money. The contract strategy is to standardise service provision and management, capturing the requirements of key stakeholders and the delivery plans for their service areas. A service provision with effective KPIs will achieve a standardised service allowing the Council to maximise economies of scale through a centralised management function. This will be an output based specification designed to meet the requirement of a diverse property portfolio. The application of defined cleaning standards to differing areas should encourage a better and more accurate pricing model.

8. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

- 8.2 The council's extensive activities generate a need for the provision of cleaning and associated services. This procurement exercise seeks to identify a service provider with a proven record of sustainable achievements who can demonstrate that their own environmental policies mirror those of the council. In seeking a partner to deliver these services consideration will be given to the major environmental impacts as follows:
- a. Waste, with an objective to measure baseline recycling and set targets for improvements. The council is a waste producer and ensuring a greater quantity of waste is recycled as opposed to being disposed of as residual waste contributes to the council's efforts to mitigate the impacts of climate change.
 - b. Energy and water – actively target reductions in use of energy and water.
 - c. Chemicals – the selection and use of environmentally friendly and biodegradable products
 - d. Vehicles - through the re-procurement of the cleaning and associated services contract the council will ensure the appointed contractor contributes to the council's sustainability agenda by ensuring the contractor's vehicle fleet meets the latest emissions limits specifications.

9. RISK MANAGEMENT IMPLICATIONS

- 9.1 The top five risks are identified as:
- a. Failure to award the proposed contract for a period of five years (with the option for a one year extension): In the event of not

awarding a contract covering the timescales leading up to and spanning the planning and implementation of the Civic Centre move project an additional procurement exercise would need to be carried out in 2020 which is considered to be too close to the delivery of the project.

- b. Lack of suitable contractors responding to the tender: To minimise the risk of this occurring the council will hold a supplier briefing to engage suitably sized organisations and encourage the appropriate size and type of supplier to respond.
- c. Challenge to the procurement process causing delay and reputational damage: To minimise the risk the procurement process will be overseen and supported by the corporate procurement team and with the appropriate legal advice.
- d. Procurement time line not met: In the event of not meeting the time objective and to minimise risk the incumbent contractor could be extended for the required period.
- e. TUPE: Plan to mitigate risk by ensuring that staff numbers remain below the actual number needed – currently 135 vacancies with circa 135 staff. This means a small number of casual staffing is used to provide cover.

10. CRIME AND DISORDER REDUCTION IMPLICATIONS

- 10.1 Part of the successful contractor's role will be to deal with graffiti removal on council buildings. Graffiti can give the impression of an area being run down and poorly looked after, potentially leading to further crime and disorder.
- 10.2 There are no other immediate crime and disorder implications arising from this report.

11. SAFEGUARDING IMPLICATIONS

- 11.1 Where cleaning contractors are required to clean children's centres or other buildings where there are children, young people or vulnerable adults, the appropriate safeguarding measures will be put in place. This could include cleaning only taking place during non-operational hours, constant supervision and/or ensuring sufficient checks (e.g. DBS) have taken place. The council's Safeguarding Team will be consulted to ensure this is properly reflected in the contractor's working practices.
- 11.2 There are no other immediate safeguarding implications arising from this report.

Linked Reports, Appendices and Background Documents

Linked Report

- None

Appendices

- None

Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012

- None

Officer contact details for documents:

- Ann Sutcliffe, Service Head, Corporate Property & Capital Delivery (020 7364 4077)

Cabinet Decision 6 th September 2016	
Report of: Corporate Director Development & Renewal	Classification: Unrestricted
Housing Strategy 2016 - 2021	

Lead Member	Councillor Rachel Blake Councillor Siraj Islam
Originating Officers	Martin Ling – Housing Strategy Manager
Wards affected	All
Community Plan Theme	One Tower Hamlets
Key Decision?	No

1. EXECUTIVE SUMMARY

- 1.1 The Council’s last Housing Strategy ran from 2009 to 2012 and has not been updated since. Under article 4a – Policy Framework of the Council’s Constitution, the Housing Strategy is listed as a discretionary strategy which if produced must be approved by the Council.
- 1.2 The Mayor agreed that the Council should work towards the development of a comprehensive Housing Strategy in 2016. A programme of consultation was launched on Monday 16th May 2016 with an article in *East End Life* by Mayor John Biggs setting out his concerns with regard to the measures contained in the Housing and Planning Act 2016 and informing residents that the Council will respond by developing a new Housing Strategy. The first stage consultation ran from 16th May to 31st July 2016. A second stage of consultation will run from September 16th to October 10th 2016.
- 1.3 The Strategy will need to have regard to the duties placed upon the Council by the Housing and Planning Act 2016. In addition it will need to respond to the housing priorities of the new Mayor of London, elected in May 2016. The Council is not statutorily required to have a Housing Strategy but if it chooses to do so it must have regard to Section 333D of the Greater London Authority Act 1999 which requires that any local housing strategy prepared by the Council must be in general conformity with the London Housing Strategy.
- 1.4 The Housing Strategy will be taken to full Council for approval in November 2016. This report sets out progress to date on producing the Housing Strategy, the outcomes of the first stage of consultation, proposals for the second stage of consultation and a suite of documents for approval which will form the basis of the consultation.

2. RECOMMENDATIONS

- To approve the draft Housing Strategy and attached appendices for consultation.
- To note the responses to the 1st stage consultation
- To note the arrangements for the second stage consultation

2.1 REASONS FOR THE DECISIONS

To take forward the development of the Housing Strategy within the agreed timetable.

2.2 ALTERNATIVE OPTIONS

The Mayor could decide not to take forward an overarching Housing Strategy but produce statutory documents and other stand alone housing policies.

3. BACKGROUND

At present the Council has the following housing and policy statements:

Allocations Scheme (statutory)	Approved 2013
Tenancy Strategy (statutory)	Approved 2013
Homelessness Statement 2013 /17	Approved 2013
Older Persons Housing Statement 2013 /15	Approved 2013
Overcrowding and Underoccupation Plan	Approved April 2016
Private Sector Renewal Policy	Approved April 2016

3.1 Statutory Documents

As part of the process of producing a new Housing Strategy the Council will need to update its statutory documents. The revisions to the allocations scheme and tenancy strategy will be updated separately and will be taken to Cabinet for approval.

The Allocations scheme is programmed to go to Cabinet on the 4th October and the proposals are summarised in section 5.1 of the second stage consultation at Appendix 1.

Conditions with regard to the Tenancy Strategy will be subject to regulations provided by the Secretary of State as set out in the Housing and Planning Act 2016 and will be brought forward in advance of the implementation date which is expected to be April 1st 2017.

3.2 Other relevant Housing documents

In addition to the above reports, the Medium Term Housing Revenue Account (HRA) Financial Plan, proposals for the development of a Housing Company and Fuel Poverty Strategy will also be taken to Cabinet separately and programmed accordingly.

- 3.3 All other policy areas will be updated following the consultation process and incorporated into an overarching housing strategy with links to fuller documents as appendices where appropriate. It is intended to produce a separate Homelessness Policy and a separate Private Rented Sector Policy. Draft documents which will form part of the second stage of the consultation process are attached at Appendix 2 and 3.
- 3.4 The Housing Strategy, will need to be mindful of other strategic plans produced by the Council including:
- The Community Plan
 - The Strategic Plan
 - The Local Plan
 - The proposed Growth Strategy.

Commissioning Strategies relating to vulnerable adults:

- Hostels Plan
- Sheltered Housing Plan
- Accommodation Strategy for people with Learning Disabilities.

Other corporate documents including:

- Health and Wellbeing / Better Care Fund
- Children and Families Plan.

4. Progress to date and next stages

- 4.1 As set out above, the Council has embarked upon a six month programme to develop a new Housing Strategy.
- 4.2 The programme was launched on Monday 16th May 2016 with an article in *East End Life* by Mayor John Biggs setting out his concerns with regard to the measures contained in the Housing and Planning Act 2016 and informing residents that the Council will respond by developing a new Housing Strategy.
- 4.3 The first stage consultation (16th May 2016 – 31st July 2016) comprised publication of:
- An online survey for respondents to complete (comprising a short and a long survey, seeking people's opinions and comments on issues that were identified as important to the borough's new housing strategy)
 - A housing strategy challenges and options paper
 - Internal and external partner consultation programme
 - Resident engagement programme.

The first stage consultation was both successful and informative with a total of 15 public engagements, 10 internal and partner meetings including an all Member seminar and over 400 surveys completed by the public. Several strong messages emerged including:

- Major concern over the shortage of affordable housing in the borough and concern that future rents set by the Council and housing associations will force people out of the borough
- Lack of housing choices for young people brought up , living and working in the borough meaning many on average incomes will be forced to stay at home, move out or pay high rents in poor quality private rented housing
- Support for the development of 'living rent' homes for this group at sub market levels on new build schemes developed on council estates
- Concern over population growth, impact on the environment and green spaces and whether vital infrastructure including schools, health centres and transport links will be developed to match the needs of the population
- General support for the Council's approach to meeting housing need and homelessness through prioritisation of households in most need and a comprehensive advice service.

A link to the online survey and related papers can be viewed here:

www.towerhamlets.gov.uk/housingstrategy2016

A full report on the first stage consultation is attached at Appendix 4

4.4 The second stage consultation (16th September 2016 – 10th October 2016) comprises publication of:

- A detailed draft housing strategy document with a proposed action plan.
- Draft outline 'daughter' documents of the strategy as set out above:

Appendix 2 – Draft 2016-21 Homelessness Strategy

Appendix 3 – Draft 2016-21 Private Sector Housing Strategy

4.5 These are outline documents which set out the council's proposed approach to these two important agendas and will be fully developed further into policy papers following the second stage consultation. There is also a Housing Evidence Base document which will accompany these documents but are not included with these papers.

4.6 These documents will be placed on the website and sent to all partner organisations across the Borough and the region asking for final comments by Monday 10th October.

In total the consultation period will have lasted 16 weeks through the two stages. In addition to seeking comments on the consultation document, a further series of meeting with partners and representative groups will take place and a housing conference will be held on Saturday 1st October 2016.

A further report will then be brought to Cabinet on Tuesday 1st November prior to being placed on the agenda for full Council for consideration on Wednesday 16th November 2016, subject to the report not being called in under Section 16.2 of the Council's constitution.

5. KEY ISSUES FOR CONSIDERATION

5.1 The changes in the housing market, pressure on affordability and the impact of the Housing and Planning Act 2016 will all place constraints on the how the Council can respond to the significant challenges ahead with limited resources. Consequently there are difficult choices to make. Set out below are some of the key priorities that Members may wish to consider at this stage regarding development of the Housing Strategy:

- Maximising affordable housing building from all sources of housing supply, with a focus on the borough's three opportunity areas.
- Agreeing how best to allocate homes balancing different needs including reducing the number of families in high cost temporary accommodation both inside and outside the Borough.
- Exploring the merits of creating a Social Lettings Agency that can help offer more housing options for homeless people and others in housing need.
- Setting up a housing company to deliver new homes both inside and outside the borough.
- Exploring the merits of the council buying or developing its own hotel to meet emergency housing needs and to develop directly, or in partnership with Registered Providers, a portfolio of temporary accommodation for homeless households.
- Developing a comprehensive approach to improving conditions in the private rented sector.
- Continuing to develop effective partnership working relationships with Tower Hamlets Homes, housing association and voluntary sector partners, residents and other stakeholders.

6. COMMENTS OF THE CHIEF FINANCIAL OFFICER

6.1 This report provides an update to the Mayor in Cabinet on the consultation that has been undertaken to date on the draft Housing Strategy for 2016 to 2021, and seeks approval for a second phase of consultation to commence in September on the Strategy and supporting documents that are included in the appendices to this report (the Draft Housing Strategy, the Outline Draft Homelessness Strategy and the Private Sector Housing Strategy).

6.2 The Housing Strategy contains various policies and statements setting out a range of activities and priorities for the council and key partners that will provide a clear focus for ensuring that available resources are targeted to and in line with these needs. The individual statements that have previously been approved are itemised in paragraph 3 above and have all been considered separately by Cabinet.

- 6.3 The implementation of the various elements of the strategy will be subject to the availability of funding and further reports assessing the financial impact of individual proposals will be submitted to the Mayor in Cabinet. Delivery of the strategy will be extremely challenging in the current economic climate, particularly in view of the uncertainty surrounding the implications of the recently enacted Housing and Planning Act where much of the financial detail will only become clear when secondary legislation is published over the coming months. The strategy will require a co-ordinated approach and alignment of funding from all major partners, and will also require that best value is obtained from limited sources of external funding, given that the council's mainstream resources to support the strategy are extremely limited.
- 6.4 The costs of preparation and consultation on the Housing Strategy and its constituent elements are being met from within existing revenue resources.

7. LEGAL COMMENTS

- 7.1 The Housing Act 1985 (s.8) requires local housing authorities to consider housing conditions in their area and the needs of their area with respect to the provision of further housing accommodation. The draft strategy addresses these issues. Pursuant to section 9 of the Housing Act 1985, the Council may provide housing accommodation by acquiring or erecting houses. Under the council's constitution the Housing Strategy is a policy framework document that requires approval/adoption by full council.
- 7.2 Pursuant to S.333D of the Greater London Authority Act 1999, the council is required to have regard to the London Housing strategy when preparing its strategy. The council's Housing Strategy must also be in general conformity with the London Housing Strategy
- 7.3 The Council is required to comply with the requirements of Part VI of the Housing Act 1996 when allocating housing accommodation. Section 166A of the Housing Act requires the Council to have a scheme for determining priorities and the procedures to be followed in allocating housing accommodation. The Council is required to allocate housing in accordance with the allocation scheme. The scheme must secure that reasonable preference is given to people in overcrowded housing, along with other categories of people in urgent housing need and may also give them additional preference. The Council's allocation scheme reflects these requirements.
- 7.3 Section 179 of the Housing Act 1996 requires the Council to provide free advice and assistance in Tower Hamlets about homelessness and the prevention of homelessness. It is reasonable, generally, for the Council to seek to prevent homelessness, having regard to its obligations under Part VII of the Housing Act 1996 to provide accommodation to homeless persons and the resources available to it to meet housing needs.
- 7.4 The council may rely on the General power of competence in S.1 of the Localism Act 2011 to set up housing companies, including for a commercial purpose, subject to limitations contained in the Act.

- 7.5 When carrying out its functions, the Council must have due regard to the need to eliminate unlawful conduct under the Equality Act 2010, the need to advance equality of opportunity and the need to foster good relations between persons who share a protected characteristic and those who do not (the public sector equality duty). A proportionate level of equality analysis is required to discharge the duty and information relevant to this is contained in the One Tower Hamlets section of the report

8. ONE TOWER HAMLETS CONSIDERATIONS

- 8.1 An initial Equality Assurance Checklist has been completed which does not identify any adverse impact of the draft proposals on the equality groups of the nine protected characteristics. A full assessment of individual policies such as the Allocations Scheme and Homelessness Strategy will be carried out and if any potential negative impacts are identified mitigating actions will be identified accordingly.
- 8.2 Respondents to the consultation on the Housing Strategy 2016 – 2021 document have been requested to be mindful of the duty placed upon the Council in relation to 2010 Equalities Act and are asked to identify any potential impacts of the proposals contained in this document on the equality groups accordingly. A full Equality impact Assessment will be carried out and presented to the Council for consideration when the final Strategy document is taken forward for approval in November 2016.

9. BEST VALUE (BV) IMPLICATIONS

- 9.1 The proposals set out in Housing Strategy will be required to align with the Council's Best Value Duty.

10. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

- 10.1 The Housing Strategy will have implications for sustainable actions for a greener environment and these will be considered within its development.

11. RISK MANAGEMENT IMPLICATIONS

- 11.1 The proposals set out in the Housing Strategy will carry risks for the Council. Each action is separately monitored and subject to local risk management conditions by either the Council or its partners.

12. CRIME AND DISORDER REDUCTION IMPLICATIONS

- 12.1 Well managed housing in secure neighbourhoods can contribute to the Council's ability to reduce crime and disorder in the borough. The Council works with its housing association partners and the police to tackle anti-social behaviour at an estate level and the development of further partnership through the delivery of the Housing Strategy will assist in taking forward this objective.

13. SAFEGUARDING IMPLICATIONS

13.1 Not applicable.

Linked Reports, Appendices and Background Documents

Linked Report

- None

Appendices

- Appendix 1: Draft 2016-21 Housing Strategy
- Appendix 2: Outline Draft 2016-21 Homelessness Strategy
- Appendix 3: Outline Draft 2016-21 Private Sector Housing Strategy
- Appendix 4: First Stage Consultation Report

- **Officer contact details for documents:**
- n/a

- **Originating Officers and Contact Details**

Name	Title	Contact for information
Martin Ling	Housing Strategy Manager	020 7364 0469

London Borough of Tower Hamlets

Draft 2016–21 Housing Strategy

DRAFT

Introduction from the Mayor of Tower Hamlets

Housing is the biggest issue facing Tower Hamlets residents – as my postbag and email inbox confirms every day. I spend a lot of time thinking about what the Council should do to help.

In this borough we have a wide gap between those on the highest incomes and wealth and those in poverty, very high value homes and land values and widespread affordability challenges because our most socially and economically excluded households are on very low incomes.

The shortage of affordable housing has led to high numbers of homeless families, and thousands of families still overcrowded as well as other households with both physical and other disabilities who require our assistance. Although our ageing population is relatively small we expect this to grow and have a duty to help this group remain independent within their own homes or provide extra care and support where it is needed.

We now have a very mixed economy of providers with a diminishing number of council homes, a large number of Housing Associations providing most of the social housing, a massive growth in private rented housing and declining homeownership. This has all happened over a relatively short period of time.

This profile presents numerous challenges for us in terms of both future planning and day to day provision of services which this Strategy will seek to address.

As Mayor I pledged to build 1000 new council homes, and to look at helping residents who are being priced out of renting or buying in their local area. I also want to work with housing associations to ensure they are financially sustainable and properly accountable to their residents. [I want to support private renters, promoting awareness of private tenants' rights and responsibilities](#)

This document sets out how we intend to meet these challenges and is the second stage of our consultation process. This is about more than new housing delivery as residents draw on a range of services that the council provides.

Please take the time to comment on this document so we can develop a housing strategy that reflects local people's and others stakeholders' views.

Mayor John Biggs

Executive Summary

The lack of decent quality affordable housing is the major challenge the council and its residents and stakeholders currently face. Despite the borough being the top deliverer of affordable housing in the country, we need to continue to build more homes, but at a price that people can afford. We need to ensure that the homes available to us are allocated fairly and that we explore all options necessary to meet housing need. This strategy focuses also on the standard of private rented housing and how we can improve it as it is now the largest segment of the housing market.

This broader vision to our approach is set out in the *Tower Hamlets Partnership Community Plan 2015*. The Community Plan themes focus on making the borough:

- A great place to live
- A fair and prosperous community
- A safe and cohesive community
- A healthy and supportive community

To deliver the housing aspects of our vision in the Community Plan our vision by ensuring that that:

- there are housing choices for all sections of our diverse community
- the homes people live in are in a decent condition, warm, and weathertight
- the most vulnerable people's housing needs are met in a fair and inclusive way
- all homes are in safe, prosperous and thriving areas
- that our response to housing issues is measured and achieves value for money

To deliver this vision, we have broken down our approach into four broad themes, identifying the challenges and setting out how we're going to meet them. The themes are:

- Delivering affordable housing, economic growth, and regeneration
- Meeting people's housing needs
- Raising private rented housing standards
- Effective partnership working with residents and stakeholders

To meet the challenges we face, some 28 action areas have been identified to help meet them. These include:

- Maximising affordable housing building from all sources of housing supply, with a focus on the borough's three opportunity areas
- Agreeing on how best to allocate homes balancing the need of those with different needs including reducing the number of families in high cost temporary accommodation both inside and outside the Borough.
- Exploring the merits of creating a Social Lettings Agency that can help offer more housing options for homeless people and others in housing need
- Setting up a housing company to deliver new homes both inside and outside the borough
- Developing a comprehensive approach to improving conditions in the private rented sector.
- Exploring the merits of the council buying or developing its own hotel to meet emergency housing needs and to develop directly, or in partnership with Registered Providers, a portfolio of temporary accommodation for homeless households.
- Continuing to develop effective partnership working relationships with Tower Hamlets Homes, housing association and voluntary sector partners, residents and other stakeholders

The rest of this document sets out in more detail the scale of the challenge we are facing and what we are proposing to do about it.

DRAFT

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Glossary

Section 1 – Our vision for housing in the borough

In setting a vision for housing, we need to ensure it sits within a broader vision for the borough's residents and the many stakeholders we work with. These stakeholders include private employers, housing associations, advisory agencies, services providers and people who work in the borough but who don't live here. This broader vision is set out in the *Tower Hamlets Partnership Community Plan 2015*. The Community Plan themes focus on making the borough:

- A great place to live
- A fair and prosperous community
- A safe and cohesive community
- A healthy and supportive community

These are the broad thematic headings that provide the direction for what the council does and the final housing strategy document needs to strategically fit with it.

Residents' comments are reflected in the Community Plan under the heading *Housing for all*:

Residents are worried about the affordability of homes being developed in the borough, with many households on low wages feeling that they are beyond the reach of most people who want to live in Tower Hamlets. Suitable housing options that meet the needs of people with learning disabilities, mobility issues or mental health problems are specific challenges.

Residents want the partnership to secure the continued existence of mixed communities through supporting a range of affordable housing choices that reflect the people who live and aspire to reside in the borough. They also want less development of high value housing which promotes gentrification and creates a divide, leaving certain communities behind.

Residents also highlighted the importance of issues such as drugs misuse and anti-social behaviour which can blight individual and community life on estates, and emphasised how good housing and good living conditions is fundamental to wellbeing and cohesion.

Source: *Tower Hamlets Partnership Community Plan 2015* (Page 21)

Initial consultation

The first stage consultation was both successful and informative with a total of 15 public engagements, 10 internal and partner meetings including an all Member seminar and over 400 surveys completed by the public. Several strong messages emerged including:

- Major concern over the shortage of affordable housing in the borough and concern that future rents set by the Council and housing associations will force people out of the borough
- Lack of housing choices for young people brought up, living and working in the borough meaning many on average incomes will be forced to stay at home, move out or pay high rents in poor quality private rented housing
- Support for the development of 'living rent' homes for this group at sub market rent levels in new build developments on council estates
- Concern over population growth, impact on the environment and green spaces and whether vital infrastructure including schools, health centres and transport links will be developed to match the needs of the population
- General support for the Council's approach to meeting housing need and homelessness through priority and advice

A clear majority of residents are in broad agreement with the direction set out in the Stage 1 options and challenges paper, supporting the development of truly affordable housing that meets the needs of a range of people in the borough in need on low to median incomes. It is also clear that residents are dissatisfied with many aspects of private rented sector housing and want the Council to intervene where possible to improve the quality of the sector in the borough.

We've sought to take account of these views in this document. They reflect the wide impact that housing has on people's lives. What we seek to do in this document is to set out how we think we can meet them as far as we can, within the constraints of the resources we have at our disposal and the environment in which we operate. Some of these services we have to provide, so in some instances it's about how we provide the services not whether we provide them.

The other key document to take account of is the Local Plan, the Council's strategic planning development document. The Local Plan sets out where new homes, offices, schools and transport will be located, and what policies will guide their development. This document is currently in draft form and is referred to below in section 4. It's an important document because it sets out in broad terms where the majority of new homes will be built in the borough up to 2025 and what kind of homes they should be. The Local Plan will need to be in general conformity with the Mayor of London's London Plan and will eventually need to be signed off by the Government. It is important that the council is mindful of competing regional and national priorities and policies when developing its own housing plans. For the purposes of this document, our housing vision for the borough is as follows:

Tower Hamlets Council wants to ensure that:

- there are housing choices for all sections of our diverse community
- the homes people live in are in a decent condition, warm, and weathertight
- the most vulnerable people's housing needs are met in a fair and inclusive way
- all homes are in safe, prosperous and thriving areas
- that our response to housing issues is measured and achieves value for money

To deliver this vision, we have broken down our approach into four broad delivery themes, identifying the challenges and setting out how we're going to meet them. The themes are:

- Delivering affordable housing, economic growth, and regeneration
- Meeting people's housing needs
- Raising private rented housing standards
- Effective partnership working with residents and stakeholders

In meeting these challenges, the council needs to have in place effective partnership working with residents and stakeholders including Housing associations, developers and the voluntary sector to help deliver them. This is in effect a cross cutting theme to all our work, because if we don't work in partnership, we won't successfully meet the challenges that we have identified.

Section 2 - A snapshot of the housing evidence base

Headlines

- More than 19,000 households on the housing register.
- More than 9,000 people in substantial housing need.
- 44% of households in income poverty.
- Population of TH to increase by 26% by 2026.
- The average cost of a property in LBTH is more than 14 times (£450,000) what a typical key worker could earn in wages (£35,000).

Housing Register

- 53.75 % of households are in priority categories 1 and 2.
- 7,078 of these households are over-crowded.
- 52.3% of all households on the register are Bangladeshi families.
- 506 residents on the register are under-occupying by two rooms or more.
- There are over 232 households with a need for wheelchair adapted property in category 1a and 1b.

Homelessness

- There are nearly 2,000 households in temporary accommodation of which over 1000 are housed outside the borough.
- In 2015/16 the Housing Options Team made 656 homeless decisions, this is 15% down on decisions made in 2014/15. Of the 656 homeless decisions made, 522 were accepted as homeless
- In 2015/16, 78 households were intentionally homeless and in priority need, for the same period that 522 households were unintentionally homeless and in priority need – this is a reduction of 27% compared to 2008/09
- During 2014/15 the Housing Options Team prevented over 672 households becoming homeless

Lettings

- Nearly 8,500 homes have been let in Tower Hamlets over the past four years.
- 58% of all homes let through choice during 2015-16 were let to an over-crowded household.

Housing Stock

- The housing stock in Tower Hamlets has increased by 27% since 2003; there are now almost 121,000 homes in the Borough.
- In 1986 around 82% of all homes in Tower Hamlets were Council/ GLC owned, today only 10.9% of the stock is Council owned and for the first time in the Borough's history, less than half the housing stock is social housing.
- The private rented sector is now the fastest growing housing sector in the Borough; it has risen from 18.3% of the stock in 2003 to around 39% of the stock in 2014.
- There are now approximately 7,000 student bedspaces in the Borough, the highest in London.
- There are close to 9,000 ex-right to buy leasehold properties managed by Tower Hamlets Homes in the Borough. Overall, there are more than 15,000 leasehold properties formerly owned by the Council.

- There are an estimated 2,800 intermediate housing units in the Borough.
- The Borough is growing by over 3,000 homes per year, making Tower Hamlets the quickest growing Borough in London. Consequently the borough qualifies for the highest level of New Homes Bonus in the country.
- Tower Hamlets has a strong track record of housing delivery and continues to provide among the highest number of affordable homes in the country
- Almost 2,500 affordable homes have been delivered in Tower Hamlets in the last three years.
- The council is committed to the delivery during 2014-18 of 5,500 affordable homes in total by all affordable housing providers, of which 1,000 will be by the council for rent. The majority of these 1,000 homes will be built on council-owned vacant land.
- Tower Hamlets has delivered 25% more homes than Birmingham, the second highest delivery authority in the Country and 30% more than Hackney, the second highest delivery authority in London.

Private sector Stock

- As of 2011, Tower Hamlets had approximately 67,209 homes in the private sector, of which 62% are in the private rented sector.
- Private rented is now the largest tenure in the borough with 39% of the housing stock. The London average is 25%.
- Around 16% of properties are over-crowded while 39% are under occupying.
- Approximately half the leasehold stock sold under right to buy is now privately rented.
- Approximately 37% of the private stock was built post 1990.
- 19% of the borough's stock failed the decent homes standard in 2011 compared with 35.8% nationally
- There are approximately 284 licensed Houses in Multiple Occupation (HMOs) and 70 unlicensed HMOs in the borough
- 30% of all category one hazards are in HMOs.

Future Housing Delivery

- Tower Hamlets has an annual housing target of 3,931 set up the Greater London authority and is expected to accommodate an additional 39,310 homes by 2025

Demographics and Housing Need:

- Ethnic minority households in the Borough are disproportionately affected by homelessness. In 2015/16 80% of households accepted as homeless were from BME groups. However, ethnic minority groups account for 69% of the Borough's population.
- BME households account for over 70% of households on the Housing List, and the majority of those that are overcrowded.
- BME households are, on average, larger and more likely to be overcrowded.
- Asian households are, more likely to be homeless than any other ethnic group in the Borough. Though only accounting for 30% of the population, 59% of households accepted as homeless in 2015/16 are Asian.
- Black households in the Borough are also disproportionately affected by homelessness when compared to the population as a whole. Black households make up 16% of households accepted as homeless, but represent 7% of the Borough's population.
- The largest age groups accepted as homeless are the 16-24 and 25-44 age groups (with the latter being the largest), though the numbers of acceptances from these groups have dropped significantly – again a reflection of overall reductions in homeless acceptances.

- Acceptances across most other age groups has also reduced or remained constant. In 2008/9 323 households accepted as homeless (37.9%) were from the 16-24 age group. By 2015/16 the figure was 91 households (17%) of those accepted.
- Acceptances for the 25-44 age group has seen a steady decrease. Homeless acceptances for this age group went from 454 in 2008/9 to 349 in 2015/16, a 33% reduction.
- The number of households accepted as homeless who are 60 or above also reduced, from 31 in 2008/9 to 11 in 2015/16. Acceptances among the 45-59 age group increased from 45 in 2008/9 to 71 in 2015/16.
- The number of homelessness acceptances made as a result of a member of the household having a physical or mental disability has decreased dramatically between 2008/9 from 97 households to 18 households in 2015/6. The percentage of acceptances as a result of vulnerability due to a disability is 3.4%. However, this is the third largest priority need group, behind those with dependent children and pregnant women.
- The percentage of residents 65 and over in the borough is 6% compared to London's 11%.

All data has been taken from the 2016 LBTH Housing Evidence Base

Section 3. Working with the Mayor of London against the wider national policy backdrop

Mayor of London

Sadiq Khan was elected as the new Mayor of London on 5th May 2016. Meeting housing need is one of his key objectives and the Council will work closely with him over the next four years. Set out below are his election commitments and the Council will need to consider these as it develops its own Housing Strategy.

- **Homes for Londoners** - The Mayor will set up a new team at City Hall dedicated to fast-tracking the building of genuinely affordable homes to rent and buy.
- **Putting Londoners first** - The Mayor will set a target for 50 per cent of all new homes in London to be genuinely affordable, and use mayoral powers and land to stop 'buy-to-leave' and to give 'first dibs' to first-time buyers and local tenants. He will aim to end the practice of thousands of homes in new developments being sold off-plan to overseas investors each year.
- **More investment in housing** - The Mayor will support housing associations in their plans to ensure a minimum of 80,000 new homes a year.
- **Land for homes** - The Mayor will bring forward more land owned by public bodies like Transport for London and use the Mayor's new homes team to develop that land. This will enable more homes to be built where they are needed, rather than where developers think they can make the most money.
- **London Living Rent** - The Mayor will create a new form of affordable housing, with rent based on a third of average local income, not market rates. A new form of tenure, more affordable, and giving Londoners the chance to save for a deposit.
- **Action for private renters** - The Mayor will establish a London-wide not-for-profit lettings agency to promote longer-term, stable tenancies for responsible tenants and good landlords across London.
- **Action on Landlords** - The Mayor will work with boroughs to set up landlord licensing schemes – naming and shaming bad landlords and promoting good ones.

The council supports the broad approach and specific commitments the new Mayor of London has made, but we appreciate that it will take some time to implement new strategies and policies to make the needed difference. At the time of writing the council understands that the Mayor of London intends to consult on a new Affordable Housing Supplementary Guidance document that should help maximise affordable housing delivery through the planning process. This is likely to be an early step of a wider process to refresh the London Housing Strategy and the key planning document that sits behind it, the London Plan.

The council is likely to support any effort on the part of the Mayor of London to maximise affordable housing delivery and the council is already using its own resources to help do so. But we need to ensure that the interests of the borough's residents are at the fore when discussing and negotiating any changes that are proposed.

In the meantime, the Council needs ensure that its housing strategy is in general conformity with the former Mayor of London's adopted Housing Strategy (October 2014). This focused on meeting the needs of London's growing population. The Strategy aims to almost double

housebuilding to at least 42,000 homes a year for the next twenty years. This challenge formed the core ambition of the former Mayor's Housing Strategy – formally adopted in October 2014.

The strategy also aimed to better reward those who work hard to make this city a success by:

- massively increasing opportunities for home ownership.
- improving the private rented sector.
- ensuring working Londoners have more priority for affordable homes to rent

At the same time, the strategy reiterates the previous Mayor's long-standing commitment to address homelessness, overcrowding and rough sleeping.

Wider national policy context

In May 2016, the Queen gave royal ascent to the Housing and Planning Bill which will have a significant impact on our strategy. The council was opposed to many aspects of the Bill prior to it becoming an Act of Parliament, as we think it had very little positive to contribute to meeting affordable housing need in the country and in Tower Hamlets itself. However it is now legislation that we need to take account of and implement when and where necessary.

The Act includes requirements to:

- Charge higher rents to council tenants on incomes of over £40,000 a year.
- Require council planners to allow a new 'affordable' home product called Starter Homes at 20% below market cost but for sale at no more than £450,000 which will replace other forms of affordable housing.
- Make fixed term tenancies mandatory for new council tenants.
- Require Councils to consider selling higher value council homes to fund the extended right to buy for housing association tenants.

This Act and associated interventions detailed in the Government's 2015 Spending Review, such as the four year 1% rent reductions and wider welfare reform changes (including the rolling out of the Universal Credit and reduction in the Benefit Cap to £23,000 per year) will present major challenges to all stakeholders in the borough – residents, housing associations, advisory agencies and the council itself. Resources for building new affordable housing through the Greater London Authority's investment programme are likely to be limited, with the government's focus on affordable home ownership rather than affordable or social rented housing.

The council's response

In considering our response, we're particularly concerned about:

- For our residents, the continuing roll-out of Universal Credit (which combines six existing benefits into one), the cap of £23,000 benefit entitlement to be introduced Autumn 2016 for non-working households, and the reduction in benefits to disabled people. We're also concerned about government proposals to limit benefit entitlement to the local housing allowance for vulnerable people in supported housing and to reduce housing benefits for single people under 35 in social rented housing to the shared room local housing allowance. For our Council tenants, the introduction of Pay to Stay higher rents for households earning a gross income of more than £40,000 is also a challenge.

- For our council stock, the requirement by the government to fund the extension of the right to buy for housing association tenants (nationally, not just in Tower Hamlets) using the sale proceeds of much needed council homes that become empty.
- For the investment plans of social landlords, including Tower Hamlets Homes, following the reduction of social rents that can be charged for the four years starting in 2016/17 which will impact organisations' ability to invest in their stock and build new affordable homes.
- For the development of new affordable homes for rent, given the government's focus on home ownership, including Starter Homes which are likely to be priced at up to £450,000, which the council doesn't consider to be affordable to local people which will be available to any eligible person – principally first time buyers under the age of 40 in the United Kingdom – on a first come first serve basis.

This housing strategy is about how we intend to meet these new challenges and those that we continue to face. Our response will involve the council using any resources at its disposal to bring forward the development of new affordable housing and ensure that those who live in it presently are able to continue to afford to living in their home.

This will mean increasingly working on the basis of what resources the council and its partners, particularly local housing associations, have to work with. We are not anticipating significant Government grant to deliver social rented homes in the short to medium term.

One recurring theme that has emerged from the initial consultation process is around a feeling amongst longstanding residents is one of disconnection. The vast resources that have been channelled into the borough over last 30 or so years has led to a vastly improved transport network; places that have been regenerated and transformed beyond recognition; and the emergence of Canary Wharf as a financial capital to complement the City of London. But the change has arguably not benefitted the neediest and the idea of a 'trickle down' regeneration effect where private sector investment leads to positive social outcomes has arguably had only a marginal positive effect. And we have a situation whereby many local people on low to medium incomes seeing further development and regeneration not as something to be welcomed, but something that changes things for the worse.

The reality is that we will need to find a way of finding the right balance to take forward the existing model of private housing development funding affordable housing under pressure.

These are some of the challenges that the council has to wrestle with when considering residents' needs and aspirations which continue to grow, but the resources at our disposal to meet them are diminishing.

Section 4 – Delivery Theme 1 - More affordable housing, economic growth and regeneration

Why this is important

The Council believes that the provision of suitable housing for people that is decent, warm and weathertight condition is a fundamental right. Tower Hamlets is at the forefront, regularly delivering the highest amount of affordable housing nationally for what is one of the geographically smallest boroughs in the country. Twinned with this is ensuring that the parallel challenges of delivering economic growth and regeneration that benefits local people. For ongoing investment to be successful and sustainable, the benefits need to go beyond the bricks and mortar of housing, essential though the housing is. A new facet to the challenge is sustaining delivery in what is a difficult environment with limited public funding available for new affordable rented housing. The prospects for the residential housing market currently look uncertain and we need to be flexible about how we approach the housing delivery work that we have been successful in achieving in the past.

Population growth, meeting housing need locally and the requirement to contribute to meeting housing demand across London all point to the continued development of thousands of new homes in the Borough over the next ten years.

This section sets out the strategy in terms of number of homes, the broad location, and the type and cost of affordable accommodation in the borough which we aim to develop. We also set out how we want to see economic growth and regeneration calibrated to help meet residents' broader aspirations. Much of the economic growth and regeneration in the borough is housing-led, so we need to ensure that this kind of investment gives us more than new affordable housing, important though this is.

4.1 Building new homes: Local Plan Policy

During December 2015 to February 2016 the Council undertook the first stage of consultation on its new Local Plan which is the key planning document for the borough. The Plan should make clear what development, e.g., homes, offices, schools, is intended to happen over a certain period; where and when this development will occur; and how it will be delivered

Responses to this document, *Our Borough, Our Plan – A new Local Plan First Steps (Dec 2015)* have been received and are currently being considered. A further, more developed version of the Draft Local Plan will be consulted on in autumn 2016. The aim is to adopt the final Local Plan document, subject to secretary of state approval, by autumn 2017.

The December 2015 document stated that:

Tower Hamlets is expected to contribute a minimum of 39,310 new homes, approximately 10 per cent of the London housing target, by 2025. The borough's ability to supply land for housing in these quantities is becoming increasingly limited as a significant proportion of our available sites have already been developed. Land also needs to be secured to support the delivery of new infrastructure, such as schools, open spaces, health centres and transport links to create sustainable communities – Our Borough, Our Plan – A new Local Plan First Steps (Dec 2015)

The borough currently has around 121,000 homes, so adding a further 39,310 by 2025 is going to have a major impact and add additional pressures on the places that we have and the services that the council provides.

What we set out in the in final housing strategy will set the direction of travel towards what is set out in the Local Plan as we're adopting our housing strategy in autumn 2016, a year earlier than the Local Plan. The Local Plan document and associated guidance documents are the key documents referred to when considering planning decisions, but until the Plan is adopted the draft planning documents will be considered as 'emerging policy'. The adopted housing strategy influences current and emerging planning policy but will not determine it.

At present, the council seeks 35% to 50% affordable housing on new developments, but due to national planning policy and viability arguments made by developers, it is often difficult to deliver affordable housing within that range. Due to the significant proportion of housing that is proposed by private developers, which historically has yielded a large amount of affordable housing through what are called s106 agreements, the council will need to continue maximising affordable housing from this source.

This will prove increasingly difficult with the policy changes the government has brought in with the Housing and Planning Act 2016, particularly on Starter Homes, which will be set by the government at a cost of up to £450,000 in London.

A common perception of housing choice in Inner London areas is one where you have to be very wealthy or very poor to be able to access accommodation. Even what many of our residents would consider a high income is not necessarily sufficient to enter the low end of the home ownership market. An outcome sought from this strategy is recreating some of the housing choices which enabled the borough to attract a wide range of people that contributed to public services, e.g., essential workers, but also people who contribute to the borough's diversity and cultural life. We need to look at what we can do to re-create those choices in a lasting way and understand what outcomes they can generate.

The borough has hosted significant housing delivery in the past decades for a mix of reasons: the redevelopment of docklands, its proximity to the City of London and more recently the Olympic Park (now the Queen Elizabeth Park); major local authority led estate regeneration schemes, e.g., Ocean Estate and Blackwall Reach; and now with the more recent Overground and Dockland Light Railway upgrades, the transport infrastructure is soon to benefit from Crossrail opening in stages from late 2018 onwards, providing the transport infrastructure for higher density housing development.

As set out in *Our Borough, Our Plan – A new Local Plan First Steps (Dec 2015)* land available to build new homes is becoming increasingly limited and in an increasingly challenging environment, a balance needs to be struck between housing development and educational, health and other community infrastructure needed to create great places to live, one of our community plan themes. However, significant housing development is likely to be a continuing theme in Tower Hamlets with many of the new homes expected already in construction.

The significant housing delivery the borough has hosted is likely to continue for the next decade, mainly but not exclusively in the areas below identified by the Mayor of London for housing and employment growth:

- Area 1 - City Fringe / Tech City (including Whitechapel) where 15,000 homes can be delivered.
- Area 2 - Isle of Dogs and South Poplar – 10,000 homes can be delivered.
- Area 3 – Lower Lea Valley which the Tower Hamlets element includes the Poplar Riverside Housing Zone where 9,000 homes can be delivered.

Through identifying specific areas for major growth, the Council can take a more co-ordinated approach to developing an area in a holistic manner, ensuring that other essential infrastructure including schools, leisure, health facilities and appropriate transport links can be developed in order to meet the needs of the growth in population.

The council is already working with the Mayor of London to maximise affordable housing delivery in the Poplar Riverside area through a Housing Zone. We will need to look at other ways of ensuring affordable housing delivery can be accelerated, possibly through the adoption of an alternative delivery mechanism.

Whilst the majority of future housing will be built in the three areas identified above, there will continue to be new development in other areas of the borough, particularly where the council has the opportunity to build on its own land.

Action 1: Maximise affordable housing building from all sources of housing supply, with a focus on the borough's three opportunity areas

4.2 Outcomes from the Mayor of Tower Hamlets Housing Policy and Affordability Commission

Mayor John Biggs established a Mayoral Housing Affordability Commission to investigate the delivery of actual affordable housing. The Mayor appointed an external expert panel who met three times between December 2015 and February 2016.

The Mayor in Cabinet considered the recommendations of the Affordability Commission at a meeting on the 10th May 2016 and agreed to prioritise the following areas of work:

- deliver 100% rented housing on council owned sites combining social target rents and homes at a 'living rent' (set at a proportion of median incomes at or below Local Housing Allowance levels) that is affordable without recourse to benefits for households with median incomes. These would cross-subsidise the social target rented homes.
- investigate letting the living rent homes through a separate waiting list and potentially developed by a council sponsored housing company.
- explore the option to reduce Borough Framework rents on S106 sites (where private developers are required to deliver affordable housing) to more affordable levels including social target rents taking into account impact on viability and possible reduction in overall affordable housing units.
- plan for emerging Government policy, in particular the proposed requirement to deliver 20% Starter Homes on schemes over 10 units as part of the affordable housing offer.
- review its policy regarding commuted sums (i.e., money from private developers instead of affordable housing) for affordable housing elsewhere with reference to the broader objectives of increasing affordable housing development and supporting estate regeneration

Intermediate Housing

Intermediate housing is for people who need affordable housing, but would receive low priority on the common housing register. It provides a much needed source of accommodation for people who want to live and work in the borough particularly key

workers. For many years it has provided a supply of accommodation for people who cannot afford homes on the open market.

A traditional form of affordable home ownership in the borough has been through the provision of shared ownership homes built by housing associations. Typically an applicant can buy (usually with a mortgage) a minimum of 25% of the open market value of a home and rent (and pay service charges) for the remainder. Because of high house prices in the borough, even this model is becoming increasingly unaffordable for people on average incomes. Other forms of intermediate housing include sub market rented housing which is below private market rents but above social rents.

The council will need to review how it approaches the delivery of intermediate housing with the advent of Starter Homes and the increasingly unaffordable cost of shared ownership housing. Increasing the amount of genuinely affordable homes for ownership for local people is an important part of the council's future housing approach.

Actions 2:

- Use council-owned sites to deliver 100% rented housing combining social target rents and homes at 'living rent'.
- Use council-owned sites to develop living rent homes let to applicants from a separate waiting list and potentially developed by a council owned Housing Company.
- Reduce government defined Affordable Rents to lower levels including social target rents taking into account the possible reduction in overall affordable homes for rent.
- Plan for emerging Government policy, in particular the proposed requirement to deliver 20% Starter Homes on schemes over 10 units as part of the affordable housing offer.
- Review its policy regarding commuted sums for affordable housing, with the aim of:
 - Creating mixed and sustainable communities
 - Considering the overall output of affordable housing
 - Making best use of Council owned land/assets
- Develop clear policy for market sale, for discounted market sale including Starter Homes and shared equity schemes with reference to evidence available regarding take up of subsidised home ownership schemes.
- Explore long term financial investment from institutions for an intermediate rent product for households with average/median incomes.

4.3 Funding new council homes, estate regeneration and other affordable housing

The council continues to be a major landowner in the borough through its ownership of homes and council land managed by Tower Hamlets Homes. In recent years it has been undertaking a council house building programme part funded by right to buy receipts. However, the government's policy of reducing social rents by 1% a year for four years, means that previous assumptions on future revenue for asset management of council housing and building new homes has had to be revised.

That said, the council is committed to supporting the delivery of:

- more council housing
- more housing association affordable homes to rent and buy
- the regeneration of our estates
- Investigating building and/or acquiring new homes, possibly outside the borough Intermediate housing, i.e., homes for working households, including shared accommodation in certain circumstances

The council is committed to the delivery during 2014-18 of 5,500 affordable homes in total by all affordable housing providers, of which 1,000 will be by the council for rent. The majority of these 1,000 homes will be built on council-owned vacant land.

Pipeline sites

The Council was successful in securing GLA grant funding of £3.960 million towards the costs of two new build schemes on the Locksley Estate and Hereford St comprising 92 new homes. These are both infill sites on existing housing estates.

The Council will also deliver 44 units on the Baroness Road and Jubilee Street sites. The Baroness Road scheme is an infill site on an existing housing estate, and the Jubilee Street proposal is to build on a disused hard standing area previously used as a car park.

In addition, the costing analysis to develop 134 units on the Tent St and Arnold Rd sites has now been completed.

In July 2016, the Mayor in Cabinet agreed that a revised capital budget in order to deliver 270 units on six new-build sites. The Table below shows an overall summary of the Council's new-build programme.

Scheme	Units	Comment
Poplar Baths/Dame Colet House	100	Completed
Bradwell Street	12	Completed
Watts Grove	148	On site
Jubilee Street	24	Planning Application for August 2016
Baroness Road	20	Planning Application for August 2016
Locksley Estate (Site A & D)	54	Planning Application for August 2016
Hereford Street	38	Planning Application for Sep 2016
Tent Street	72	Planning Application for Sept 2016
Arnold Road	62	Planning Application for Sept 2016

Action 3: Complete a full capacity study of Council owned land site (within the Housing Revenue Account and the General Fund) to identify further opportunities and funding options.

4.4 Increasing and widening housing supply and choice

The housing challenges the council and its residents currently face mean that we need to look at options that even a few years ago might have been considered unattractive. Some initiatives may look as if we're competing with our partners, but in the main the rationale for our approach is simple: if we're going to use our own resources to fund new initiatives, we

need to retain control of the resources used. This doesn't mean we won't use services that some partners provide, e.g., housing associations, as they are more experienced both at mixing private and public money to deliver social outcomes and operating in the market place. Initiatives we are considering include the following:

- **Social lettings agency**

This would involve establishing an agency to manage good quality homes in the private rented sector both in the borough and outside it. Other local authorities and registered providers are considering this idea so we will need to consider options for partnership working if this proposal is to be progressed.

- **New housing company**

Like many other Local Authorities, the council is considering setting up a new Company to deliver housing on its behalf. This could include homes both inside and outside the borough and for both rent and sale. The advantage of this is that it would speed up delivery and possibly enable more homes to be built. The Council will bring forward plans for the company later this year.

- **Co living Model of Housing**

This involves using accommodation in a more intensive way, where residents have sole use of a room but share facilities such as kitchens, bathrooms and leisure space. Such schemes are likely to work in high density locations and would need to be car free and may be targeted at certain groups such as single working people. This housing model can suit a certain lifestyle, for a certain period of time, but is not intended to be a permanent form of accommodation. The proposed council sponsored housing company may have a role to play in delivering this kind of accommodation.

- **Council owned temporary accommodation**

The council has been successful at both preventing homelessness and meeting homeless households' needs. It will always seek to avoid using bed and breakfast accommodation, but sometimes this is unavoidable, particularly when a homeless applicant presents themselves to the council and needs a roof over their heads urgently. Rather than spending money on high cost bed and breakfast accommodation, the council is considering buying or developing its own accommodation to meet emergency housing needs. Furthermore the Council is also considering options to develop or convert existing accommodation for use as temporary accommodation to reduce its reliance on the private rented sector. This is due to the increasing difficulty of procuring affordable temporary private sector housing and the cost to the Council of subsidising the high rents, in light of the Government's decision to freeze temporary accommodation subsidy since 2011.

Actions 4:

Explore the merits of creating a Social Lettings Agency that can help offer more housing options for homeless people and others in housing need.

Set up a housing company to deliver new homes both inside and outside the borough.

Explore the merits of the developing a co living model of housing for working people.

Explore the merits of the council buying or developing its own accommodation to meet emergency and temporary housing needs for homeless households.

4.5 Energy efficient, high quality, well designed affordable homes

New residential developments should be designed to achieve high energy efficiency targets and be near-zero energy buildings. Such buildings are designed to reduce regulated energy use for space heating, hot water, cooling, ventilation and fixed lighting but does not relate to non-regulated energy use, e.g., plug in appliances and cookers. Such developments are required to follow the energy hierarchy of Be Lean, Be Clean and Be Green to reduce energy demand. Through reducing energy demand the new properties will have low running costs for future residents to have a low carbon footprint and also reduce fuel poverty. The proposals for near-zero energy buildings will see a minimum 45% reduction in carbon dioxide emissions on-site, with the remaining regulated carbon dioxide emissions to 100% to be off-set through the Councils adopted carbon offsetting programme.

For existing residential accommodation, poor energy efficiency of a home is a contributor to fuel poverty and affects the most vulnerable households which in turn can exacerbate health issues of the households. Through carbon offsetting the Council will deliver residential energy improvement projects, thereby reducing energy use for existing residents to alleviate fuel poverty and reduce Borough wide carbon emissions.

10% of homes should be designed to meet Part M Category 3 wheelchair adaptable housing, and, for units where future tenants have been identified and their needs assessed by the Local Authority, these units should be built to the full wheelchair accessible standard (Part M Category 3 (2b)). Other homes should be built to meet Part M Category 2, unless the introduction of a lift would adversely affect service charges to such an extent as to prevent the homes being affordable.

The council will seek to build homes that deliver:

- energy efficient standards which helps both reduce fuel poverty and carbon emissions
- acceptable space standards meeting *DCLG Technical housing standards – nationally described space standard (March 2015)* and ideally exceeding them
- bedroom mixes that meet people's needs
- wheelchair accessible standards as set out above and Lifetime Homes Standards.

Actions 5:

Ensure new developments are built to near zero energy high efficiency targets and through carbon offsetting initiatives the Council will deliver residential energy improvement projects.

Building on the Mayor of London's earlier Housing Design Guide, the council will seek the highest quality housing standards in new affordable housing built in the borough.

4.6 Modular Housing

The council will also consider developing the use of portable modular housing which can be used for shorter term lettings, primarily for homeless families awaiting permanent accommodation. This type of housing can be set up quickly on empty sites which may be awaiting development and be reused as sites change use, or alternatively to provide such accommodation on a long-term basis to help meet the current and future needs of homeless households in the Borough. The Council has been working in conjunction with the East London Housing Partnership on researching the different types of modular housing now

available on the market and will develop its approach to this type of housing during the period this housing strategy covers.

Action 6: Investigate the use of modular housing to assist in meeting housing need across the Borough.

4.7 Self build and custom housing

The Self Build and Custom Housing Act 2015 requires the council to hold a register of individuals and associations of individuals who are seeking serviced plots of land (i.e., serviced with water, electricity, etc) to either self build their own homes or use custom housing (e.g., housing, wholly or partly assembled in factories). The council will be maintaining such a list as required by law and will monitor interest in this form of housing.

Action 7: Analyse the register of self builders in line with statutory requirement and in order to inform the Local Plan and respond to self and custom build demand.

4.8 Regeneration: Jobs, Skills and the Local Economy

With the major growth of residential, business and cultural activity across the borough in the coming decades, the need for a connection between capturing the value of growth and applying it to those who need a start most continues to be great.

An ongoing challenge for the council is how to maximise social, economic and environmental gains for the disadvantaged in our communities from the enormous private sector economic activity undertaken in Canary Wharf and the City of London adjacent to the borough.

Consequently, we need a specific strategy to address the needs and aspirations of young people in the borough who are joining the world of work for the first time to ensure they receive the benefits of new and continuing private investment in the borough.

As referenced earlier, the three opportunity areas in the borough in the Lower Lea Valley including Poplar Riverside, South Poplar, and City Fringe / Tech City (including Whitechapel) is where the main growth will be in the future.

Later this year, the Mayor will be considering a new growth strategy to help ensure local job opportunities are maximised for local people. This will be about higher quality jobs than are traditionally available for local people. Important though jobs are for cleaning, working in restaurants, and other kinds of service work, we need to identify white-collar career pathways for our own local people, particularly those who have completed higher education but who are unemployed or in employment below their capabilities and potential.

A characteristic of the Universal Credit regime is the imposition of a £23,000 a year cap on benefits for households without an adult in work. For households who are paying high rents, the housing benefit element of which is within the Universal Credit, will mean such households will need to ensure one member enters the employment market if they wish to avoid rent arrears and other associated debts. The council and its registered provider partners have a role to play to access such opportunities to households in order to facilitate both economic inclusion and avoid household poverty and homelessness itself.

Action 8: Develop a new growth strategy to help ensure local job opportunities are maximised for local people

Section 5 - Delivery Theme 2 – Meeting people’s housing needs

Why this is important

Maintaining a high supply of new affordable housing is a core theme of this strategy, it's as important that the homes are allocated on a fair, inclusive and transparent way. Due to the continuing high demand for affordable and other forms of suitable accommodation, the council has to think innovatively about how to meet this demand. This means considering housing options outside the borough and also using private rented accommodation to meet its homelessness duties. There are also other specific areas of housing needs which the council needs to adopt specific approaches to which are covered in this section.

The previous section focused on how the council is going to increase the amount of affordable housing and ensure residents benefit from economic growth and regeneration in the borough. This section focuses on who receives support in meeting their housing needs and on what basis.

5.1 Common housing register allocation scheme

The council is required by law to have a Housing Allocation Scheme which sets out how local people can join the housing register. The council operates its scheme in partnership with housing associations that have homes in the borough and are signed up as borough partners.

For that reason, the council's scheme is called *The Common Housing Register Partnership Allocations Scheme (23 April 2013)*. As part of the housing strategy consultation process, we are going to review and consider amending some aspects of the scheme in conjunction with our Partnership members.

Cabinet in October 2016 will be asked to agree a number of changes to the Common Housing Register Allocation Scheme. These are principally to:

- Note the changes to the Allocations Scheme regarding the new Right to Move for employment reasons as required by changes in government regulations – This is a new government regulation came into effect on 20th April 2015 requiring local authorities to set aside 1% of lets to rehouse 'social tenants' who want to move for employment reasons where the employment is more than one year and over 16 hours per week.
- Agree to a new sub band in Band 2 of the Allocations Scheme to avoid the risk of legal challenge to present policy on applicants in housing need who do not meet the 3 year residence requirement – this is because of a recent court case involving Ealing Council where their policy included a similar residential requirement that was challenged by a homeless applicant fleeing domestic violence who did not meet the criteria.
- Agree to restrict existing policy that allows applicants to bid for 1 bed smaller than their assessed need where room sharing would only be accepted for children of opposite sexes under 10 years old.- the current scheme allows applicants to bid for homes 1 bed smaller than their assessed housing need, principally to mitigate the impact of the Bedroom Tax and Welfare Reform changes. Common Housing Register partners are concerned that some cases rehoused causes inappropriate overcrowding. It is proposed to retain the policy, but only allow children of opposite sex sharing a room if both are under 10 years old.
- Agree to amend the quota for Band 3 lets from 10% of one, two and three bed properties

to 5% of 1 bed & studios per annum – because homelessness is increasing, meaning expensive temporary accommodation is having to be used, it is proposed to reduce the number of lets to Band 3 who are not in housing need thereby increasing the number of available homes to high priority cases.

- Authorise the use of some social housing general needs stock as non – secure tenancies for temporary accommodation up to a maximum of 100 units per annum. This will help build up the council's supply of temporary accommodation to meet homeless needs.
- Agree the Lettings Plan for 16/17 and extend it to 17/18 – this sets out the quotas for certain need groups, such as the foster carers, care leavers, and key workers, for social housing.
- Agree to add social worker to the professions that qualify for key workers status set out in the Allocations scheme – this is proposed as the council is experiencing difficulties in recruiting and retaining experienced social workers.

The report also proposes to use private rented accommodation to discharge its homelessness duties in limited circumstances.

Action 9: Refresh the Common Housing Register Allocation Scheme to widen housing options for the council to give priority to those in housing need and use private rented housing and other suitable accommodation to meet housing needs.

5.2 Intermediate Housing Register

For many working people who want to live in the borough, they neither qualify to join the housing register to access affordable rented housing nor are they able to buy a home on the open market. This means they either live in private rented accommodation, often sharing with others, or leave the borough altogether. One of the themes of this housing strategy is to create housing choices for all sections of the borough's diverse community. To achieve this we need to look at how choice in what is called the intermediate housing market can be both increased and widened. At the moment, housing choices are confined to shared ownership (part rent, part ownership) schemes and sub market intermediate rent schemes, meaning rents are above social rents but below private rents, normally at least 20% below.

We know from what people tell us, and the evidence supporting our Local Plan, there is strong demand for this kind of housing. Many working people on low to medium incomes who do not rely on state benefits have their housing choices limited to the private rented sector. With interest rates continuing to be at a historic low, people who are unable to save for a deposit (often because they are spending on their disposable income on high rents) are not able to access home ownership.

A robust indicator of demand would be provided by an Intermediate Housing Register. This register would have similar but looser rules on eligibility and priority to that which governs the Common Housing Register for those needing affordable rented housing. For example, we would give priority to people living in the borough; consider creating quota for essential workers; restrict access to intermediate housing choices to people over a certain income and savings, but also ensure the expectations of applicants who may not be able to sustain the costs associated with home ownership are managed carefully.

Just as we need to continue delivering more affordable rented housing, we need to ensure that those who need affordable housing for home ownership (or intermediate rent) have

choices too. The intermediate register would act as the gateway for those applying for homes built at living rent as proposed in section 4.2 of this document.

Action 10: Develop and implement an intermediate housing register

5.3 Homelessness Strategy

The council currently has in place a *Homelessness Statement 2013 to 2017* which sets out our approach to preventing and reducing homelessness focused on:

- Homeless prevention and tackling the causes of homelessness
- Access to affordable housing options
- Children, families and young people
- Vulnerable adults

Many aspects of this document are still relevant particularly those related to partnership working and prevention but over the next 12 months we will consider what other options are available to prevent and meet homelessness demand. These will include:

- Use of Temporary accommodation for homeless families

The Homelessness Strategy will also need to consider the options to reduce the number of homeless households from Tower Hamlets who are currently in temporary accommodation. At present there are around 2,000 households in temporary accommodation, of whom over 1,000 are placed outside the borough. Over 200 households are in bed and breakfast accommodation.

This form of accommodation creates uncertainty and upheaval for residents and is becoming increasingly expensive for the Council to procure, with suitable accommodation proving too expensive in borough resulting in more households being placed in outer London and beyond.

The Council needs to agree how best to tackle this problem with potential solutions including:

- developing its own temporary accommodation as set out at 4.4 above
- using existing permanent council and registered provider properties for short term homeless housing as set out at 5.1 above
- continuing to use homes temporarily on estates that are being decanted for regeneration
- continue publishing under what circumstances it will place households outside of the borough
- buying back ex Local Authority homes sold under the Right to Buy

We will update the homelessness document to reflect progress over the past 3 years and will engage fully with all partners in 2017 to develop a further 4 year action plan to continue to tackle homeless. There will be an emphasis on ensuring the most vulnerable and marginalised groups who face homelessness can continue to be assisted linking their support into their health needs, education and employment chances and overall wellbeing.

Progress since 2013 includes:

- **No wrong door Project**

The Council's Housing Options service introduced its innovative programme – called No Wrong Door to ensure that customers can access all the services they need to help resolve their housing problems from one point of contact rather than having to navigate their way through lots of different agencies themselves.

The Council's Housing Options service has been transformed to offer more help to those threatened with homelessness or needing housing advice. Instead of being able to simply offer advice on housing options, staff are working closely with other agencies so as to be able to offer information on a comprehensive range of services that help with problems that often cause homelessness or housing difficulties. This includes money advice, debt counselling, landlord and tenant mediation, specialist legal advice, help in accessing education and training, help in seeking work, access to child care and our Children's Centres.

Our Housing Options staff can make referrals to other agencies to ensure clients get the help they need, and some support services are now operating from Albert Jacob House in Bethnal Green E2 the where Housing Options staff are based.

- **Overview and Scrutiny Commission recommendations**

The Overview and Scrutiny Commission held a review of the Homelessness Services and produced 17 recommendations for consideration by the Housing Options Team. These recommendations are being addressed by the service and will either be implemented at an operational level or through the refreshed Homelessness Strategy.

- **Hostel Commissioning Plan**

The Council is developing a Hostel Commissioning Plan (HCP) 2016-2019 which was approved by the Mayor in July 2016.

- **Homelessness Partnership Board**

The Council will reform its Homelessness Partnership Board drawing on the expertise of Housing Association, voluntary sector and other statutory partners such as the health services to oversee the production, delivery and monitoring of the action plan.

Action 11: Refresh our Homelessness Statement (Strategy) and align it with the 2016-21 Housing Strategy.

Action 12: Reconvene the Homelessness Partnership Board.

5.4 Tenancy Strategy, including fixed term tenancies

The council is required by law to have a Tenancy Strategy that sets out what kind of social housing tenancies should be granted by housing associations and the council (through Tower Hamlets Homes) in the borough and what basis those tenancies should be renewed. Housing associations are required to have due regard to the council's Tenancy Strategy but are not required to follow the policies that are set out.

The government through its Housing and Planning Act intends that future tenancies granted by the council should be for fixed terms of between two years and 10 years. The government

is also proposing that where families have children under the age of nine, a tenancy should be granted until the child reaches the age of 19. There will be some exceptions to fixed term tenancies, possibly for the elderly and the disabled, which will be set out in regulations to be set by central government in the future. Depending on the level of flexibility allowed by government it is intended that the new Tenancy rules will be further consulted upon.

The government is also proposing that other than where a spouse or civil partner is succeeding a tenancy, the new tenancy should be for a fixed term. The new Tenancy Strategy, once adopted will impact on future tenancies granted by Tower Hamlets Homes, and influence the tenancy policies of our local housing association partners.

In summary, our broad approach will be as follows:

- Applicants over the age of 65 should be granted lifetime tenancies
- Applicants who are severely disabled should be granted lifetime tenancies, with exceptions made where the property is wheelchair accessible accommodation
- Applicants who have children under the age of nine years old should have tenancies for at least 10 years
- General needs applicants (including those who succeed a tenancy) should be granted tenancies of up to ten years
- There should be a presumption of a fixed term tenancy being renewed if the tenant(s) housing needs are the same (or greater) than at the time of the original application
- Introductory tenancies for council tenants and starter tenancies for should be for 12 months, increased to 18 months where the tenant has not met one or more of the tenancy conditions, e.g., non payment of rent; anti social behaviour. This will be in addition to the fixed terms identified above.

It should be noted that the granting of a fixed term tenancy does not mean a tenant cannot qualify to exercise their right to buy providing they meet the qualifying conditions.

For housing association landlords, we would want them to continue the policy lettings homes on Assured Tenancies (i.e., lifetime tenancies) at social rents, but recognise in some instances this may not be possible to do that because of contractual arrangements associated with the development of new Affordable Rent accommodation. However, the council does not wish to see existing social rent homes which become empty, converted to Affordable Rent homes or with fixed term tenancies.

Action 13: Refresh the Tenancy Strategy to take account of legislative changes requiring local authorities to issue fixed term tenancies

5.5 Tackling overcrowding

The council currently has in place a 2016-2018 Overcrowding Action Plan which was updated in March 2016 and includes the following:

- Property based actions by delivering larger family accommodation through s106 schemes and new affordable housing schemes.
- Lettings actions set through the operation of the Common Housing Register Allocation Scheme (April 2013).
- Advice and partnership actions by ensuring all housing associations with stock in the borough sign up to the Common Housing Register Forum.
- Under occupation actions by developing bespoke packages to meet specific households' needs; encouraging housing associations to reduce under-occupation; and financial incentives to encourage under-occupiers to consider moving.

Action 14: Keep under review the Overcrowding and Under-occupation Plan

5.6 Older Persons' Housing Needs

People are living longer and often do not have housing choices that enable them to move to more appropriate accommodation that meets their needs. In an affordable housing context, this can involve small-sized households, sometimes single people, under-occupying family homes which could be used for larger households. Whilst the council has access to sheltered housing for older people available through its Housing Association partners, older people's needs sometimes require consideration of health and/or mobility issues. The need to continue to meet the two aims of the council's 2013 – 2015 Older Persons' Statement remain valid, which are:

- Aim 1: Provide a range of good quality accommodation and access to home adaptations and improvements that offers older people housing that meets their needs;
- Aim 2: Help older people to continue to remain active, independent and healthy in their homes supported by flexible and affordable services

The council's view is that a third aim should be added to this which is:

- Aim 3: Develop a specific approach that meets the needs and wishes of older people that will help incentivise households who are under-occupying by giving them a wider range of choice. This aim recognises that is a large and growing cohort of older people who do not require institutionalised care as well as those who do, often through extra care schemes

The Council has agreed that rather than refresh its Older Persons' Statement it will contribute fully towards the development of the Council's proposed Ageing Well Strategy that aims to cover all aspects of the health, wellbeing and quality of life of people growing older in Tower Hamlets – ensuring that Tower Hamlets is a borough where growing older is about retaining independence and dignity with the assistance of family friends and the community where necessary but knowing that the right care and support is there if that independence becomes significantly reduced.

Key housing issues which will have to be reviewed include defining future provision of older persons housing requirements as required by current National Planning Policy and reviewing all aspects of support for the ageing population including support through sheltered residential and extra care housing.

The scope of the proposed strategy encompasses the breadth of responsibilities placed upon the local authority by the Care Act 2014. In summary these responsibilities are centred on:

- maintaining and promoting independence and wellbeing.
- facilitating the development of a vibrant social care market in the borough.
- assessing and providing for needs which the authority has a duty or power (subject to available resources) to meet. This encompasses both the provision of a range of services in the community (to enable the individual to continue living in their own home) and the provision of residential and nursing home care when living in your own home is no longer a viable option.
- safeguarding vulnerable individuals. and
- working in partnership with the NHS and other stakeholders to deliver integrated and personalised care and support.

The strategy will also provide a core reference point for the future development of service delivery and/or commissioning strategies for a range of adult social care and supported housing services including:

- Information and advice provision.
- Community support, handypersons and befriending type services;
- Advocacy.
- Personal care.
- Daytime activities provision.
- Support and care in sheltered and extra care sheltered housing.
- Residential and nursing home care.

A reference group incorporating all stakeholders including residents and carers and housing partners will be set up to oversee the development and implementation of the Strategy.

Action 15: Contribute towards the development of the Corporate Ageing Well Strategy which includes reference to developing accommodation designed to meet the needs and wishes of older people.

5.7 Supported Housing and other forms of temporary accommodation

Supported Housing plays an important role in providing accommodation for people who may have dependency issues, such as alcohol, drugs, or who have particular mental health issues. Other needs that need to be met include those of rough sleepers; people with learning difficulties; and people with specific health needs. Consideration also needs to be given to children leaving care and those fleeing domestic violence. The services required, such as floating support, to enable people to live independently is funded through the Vulnerable Adults Commissioning team.

Some of these groups immediate and longer terms needs will be picked up through policies developed out of the Homelessness statement and we will consider the needs of all these groups when developing new housing and reviewing allocations policies and take into account the view of our partner organisations who provide services to the most vulnerable people in our community.

5.8 Housing for people with Learning Difficulties and autism

The vulnerable adults commissioning team are developing an Accommodation Plan which will provides an overview of the accommodation available to People with Learning Disabilities (PWLD) The borough seeks to improve the overall offer of accommodation including opportunities to invest to save whilst also supporting young people to remain close to their families, friendship networks and local community. It is recognised that this is just the start of a longer piece of work and in the next three years will be undertaking additional research to ensure that services are responding to the changing needs of this population. This will include an analysis of older carers; degenerative disease in older PWLD as well as a larger review of all out-of-borough placements.

The national autism strategy asks local authorities if their housing strategies specifically identify the housing needs of people living with autism which include an estimate of how many people with autism we would be expecting to i) live in the community ii) live in supported housing iii) live in residential / nursing care. The “transforming care programme’ is a national programme that aims to further reduce the number of people with a learning disability and/or autism who display behaviour that challenges, including those with a mental

health condition who are in institutions, particularly aiming to reduce the number of in-patient facilities and increase the number of people with an LD or autism who are living in the community.

The council will work corporately towards meeting the needs of people with learning difficulties and autism over the next three years.

Action 16: Support the development of the Accommodation Plan for People with Learning Disabilities (PWLD) and autism

5.9 Project 120 - meeting the needs of people who use wheelchairs

Project 120 (P120) was started in 2012 to address the specific housing needs of families with a wheelchair user and other complex medical needs on the Council's Housing waiting list. The name stems from the 120 families who were on the Accessible Housing waiting list at that time.

The Council works closely with developers and housing associations to identify specific needs of a family at an early stage and identify a property in development which can then be adapted accordingly to meet that need. The project has been very successful and by April 2016, 148 families had been rehoused accordingly.

Action 17: Work closely with colleagues and partners to support the most vulnerable people in the borough and continue to meet their housing needs

5.10 Gypsies and Travellers

Part of the Local Plan development process deals with assessing the housing needs of gypsies and travellers in the borough. As part of this process, council officers from planning; housing and environmental health will liaise to ensure that gypsy and traveller housing needs are fully considered in housing strategy and set out in the Local Plan to be adopted in autumn 2017.

Action 18: Assess the existing and future requirements for the gypsy and traveller communities

Section 6 – Delivery Theme 3 – Raising private rented housing standards

Why this is important

The private rented sector is now the largest segment of the local housing market. While private renting is a useful stop gap option to accommodate homeless people and working households on short term contracts, it is increasingly becoming a destination for people who want to buy a home, but can't because of the lack of a deposit, partly because they are paying high rents. A part of the housing strategy is about creating more choice for such households, but in the meantime we need to ensure that the standards of accommodation for people in private rented housing are good, weeding out any bad landlords who give the sector a poor reputation.

The Council wants to raise the standard of private rented housing in the borough. Private sector housing – housing for home ownership and private renting – represents two large segments of the housing market in Tower Hamlets. Whilst much of the new private housing in the borough is both expensive and well managed, some private sector rented homes are in poor condition and/or poorly managed. The private rented sector provides a significant amount of accommodation used by the council to meet housing needs, enabling local people to stay in the borough. So it's important for the council to strike a balance between supporting landlords who are doing a good job and tackling those who are not.

There are also a significant proportion of ex council homes – 15,000 - bought under the right to buy which are now being let by private landlords. In some instances this has led to serious overcrowding and anti-social behaviour such as noise nuisance fly-tipping, and drug-related criminal behaviour on estates owned by the council and its housing association partners.

There are a number of interventions that the council is undertaking in respect of private sector housing and other initiatives and issues it has to consider. These will be brought together through a stand-alone 2016-21 Private Sector Housing Strategy and will include reference to:

6.1 Landlord Licensing Scheme

A landlord licensing scheme has been introduced for private landlords in the west of the borough covering the following wards:

- Spitalfields and Banglatown
- Weavers
- Whitechapel

The council wants to use selective licensing to tackle anti-social behaviour, deal with poor housing standards and assist in improving the overall management of rented accommodation. The Council could consider extending this scheme to homes in multiple occupation (HMOs) provided further conditions are met.

Actions 19: Review selective/additional licensing schemes for private rented sector; explore options for a scheme for houses in multiple occupation; and lobby government to use legal powers available adopt a wider licensing scheme where necessary.

6.2 Closer working with private sector landlords including promoting accreditation

The Council is committed to supporting the Mayor of London's London Rental Standard and London Landlord Accreditation Scheme to improve the quality of the Private Rented Sector.

The London Landlord Accreditation Scheme (LLAS) awards accreditation to reputable landlords who undergo training and comply with a code of conduct. Accreditation costs a small fee, which is refundable to when a landlord offers a property to the council for use as Temporary Accommodation or to prevent homelessness via an Assured Shorthold Tenancy. Accredited landlords are able to display the LLAS logo as a badge of good practice and access a range of products and incentives including local authority grants, leasing schemes and discounts on fees for licences and other charges. It was set up in 2004 as a partnership of landlord organisations, educational organisations and 33 London boroughs. To become accredited with LLAS, landlords must complete a one-day development course, agree to comply with a code of conduct, and be a fit and proper person. Accreditation lasts for five years. Accreditation is also a condition of access to Empty Property Grants.

Action 20: Support the Mayor of London's London Rental Scheme and London Landlord Accreditation Scheme to improve regulation in the Private Rented Sector.

6.3 Private Sector Housing Renewal policy 2016-21 including the Better Care Fund and empty homes

The council is required to have a private sector housing renewal policy. The council's current Private Sector Housing Renewal Policy 2016 – 2018, makes available a mix of grants and loans, some of which are means-tested, to tenants and landlords that fund:

- Bringing long term empty homes back into use

As of May 2016, Council Tax records showed that 4,595 properties in Tower Hamlets have been empty for more than a year. Of these 2,963 are residential properties; 1,632 are commercial. In the context of a housing crisis, these vacant properties could provide desperately needed homes. The Council can adopt a number of approaches towards bringing empty properties back into use including negotiating with owners, empty property grants, enforcement through Empty Dwelling Management Orders and Compulsory Purchase Orders

- Disabled facilities that allow tenants to live independently in their homes
- Home repair grants to fund small scale repairs so that tenants can remain in their own homes safely and avoid minor accident

Disabled Facilities Grant is now contained within the Better Care Fund (BCF) which is a programme spanning both the NHS and local government. The intention is to improve the lives of some of the most vulnerable people in our society, placing them at the centre of their care and support, and providing them with 'wraparound' fully integrated health and social care, resulting in an improved experience and better quality of life. The overall use of grant in relation to working across the sector to better enable hospital discharge and home security will be developed over the course of this strategy.

The Council also offers grants of up to £6000 who are eligible owner-occupiers to enable them to remain in their own homes safely and avoid minor accidents. Home Repair Grants may be made available to owner-occupiers who are:

- over 60, or
- disabled or infirm,
or the parent or carer of a disabled child and in receipt of an income related benefit or eligible tax credits.

Action 21: Adopt an updated private sector housing strategy for 2016-21 which includes reference to the Better Care Fund approach and addressing empty homes issues.

6.4 Buy to leave

The council, as with other inner London authorities, has concerns about a perceived trend of homes being bought on the open market and being left empty. For the council this means fewer homes available to rent and which also has a negative impact on the local economy. We need to research this perceived trend and establish what evidence there is for it and what, if any, actions are required to address it.

As well as 'Buy to Leave' homes, existing properties are also often left empty and the council will review its existing approach to approaching owners of these properties in order to encourage them to bring properties back into use, including through legal action.

Action 22: Develop an evidence base on the extent of Buy to Leave in the Borough and if necessary review the action the Council could take to reduce the number of new homes that are being purchased but being left empty by investors and by owners of existing empty properties.

6.7 Housing Conditions: Investigation and Enforcement

The Housing Act 2004 introduced the Housing Health and Safety Rating System (HHSRS), HHSRS is the key process for Environmental Health Officers inspecting and assessing housing conditions.

The principle of HHSRS is that any residential premises should provide a safe and healthy environment for any potential occupier or visitor. HHSRS is a comprehensive risk assessment process covering health and safety risks in dwellings across twenty nine categories. The rating system works by assessing the risk associated with certain home hazards in terms both of the likelihood of harm occurring and also of the outcome of that harm.

There are several options available for the council to use if a property fails an HHSRS test:

- Improvement Notice
- Hazard Awareness Notice
- Prohibition Order
- Emergency Prohibition Order

The action taken by council will depend on the nature of the hazard. Other actions the council can undertake for the following reasons:

- Statutory Nuisance

The Environmental Protection Act 1990 imposes a duty on every local authority to inspect its area for statutory nuisances, to investigate complaints of statutory nuisance, and to take action where statutory nuisance exists or is likely to occur.

Statutory nuisance is defined as occurring where "any premises in such a state as to be prejudicial to health or a nuisance".

- **Rogue landlords and agents**

A minority of landlords and agents deliberately profit from leaving their tenants to live in rundown, unsafe, or overcrowded properties, or intimidate and threaten tenants.

The Housing and Planning Act 2016 introduces a raft of new powers to take action against rogue landlords and agents

- **Banning orders**

The Act creates a new 'banning order' concept enabling a First-tier Tribunal to ban a person from letting a home or engaging in letting agency or property management work in England.

The banning order may be requested by a Local Authority against a landlord or agent who has committed a banning order offence. The scope of what constitutes such an offence will be defined in regulations.

Action 23: The council will continue to undertake its statutory responsibilities to ensure private rented sector housing is safe to live and is well managed.

6.8 **Other Private Sector Housing issues**

Other issues relating to the private rented sector including supporting the Right to Manage for private sector and housing association leaseholders, influencing the growth and reach of institutional investment in quality private rented homes and promoting joint working towards all aspects of private rented sector housing. Issues such as working with community partners and programme a regular publicity campaign to promote awareness of private tenants' rights and providing more targeted advice to leaseholders on the right to manage are discussed in more detail in sections 4.8 to 4.10 of the Private Sector Housing Strategy Outline at Appendix 3 of this document.

Section 7 – Delivery Theme 4 - Effective partnership working with residents and stakeholders

Why this is important

As a guiding principle, more is achieved through working with people than not. Partnership working at its highest level is illustrated through the council's work with partners on the Community Plan, adopted in 2015. In housing terms, the council continues to be reliant on partners in the housing association and broader third sector to help deliver its housing objectives. A key element of this partnership working centres on the operation of the Common Housing Register and the Preferred Partners Agreement which the council wishes to see continue. In addition the council places strong value on its partnership working with residents and seeks to underpin this by ensuring the boards of Tower Hamlets Homes and local housing associations have resident representation.

The council needs to consider the way it works with its partners, primarily its residents; housing associations; and other stakeholders in the borough and the Greater London Authority.

It will be important that the council is clear in expressing what changes are going to be proposed over the coming years and explain why. Some issues such as the passing into law the introduction of fixed term tenancies will involve further consultation and some difficult discussions with existing tenants and particularly those who hope to live in the borough in the future.

The introduction of Universal Credit benefits system may mean that council and housing association tenants in the future will have to pay their rent in a different way so we need to make sure advice and support is in place to ensure rent arrears do not build up.

In terms of specific areas of partnership working in the future:

7.1 Tower Hamlets Homes and the council's tenants and leaseholders

Tower Hamlets Homes (THH) is the arms length management organisation (ALMO) that is responsible for managing and maintaining the council's housing stock of some 21,000 social rented homes and leaseholder homes originally sold under the right to buy.

The ALMO (a company 100% owned by the council) was established to access government funding to deliver a decent homes programme, to repair and modernise the housing stock, whilst this programme was completed in 2016, the council continues to make significant investment in its stock to maintain a decent standard.

There has been an initial consideration of a possible extension of the Management Agreement (MA) for two years to July 2020. However, it would be prudent for the Council to consider extending its MA with THH for three years to 2021. It is rational to extend the MA for three years because it underpins the Council's commitment to the ALMO. Particularly, to deliver the Council's recently updated HRA Medium Term Financial Plan (MTFP). The MTFP covers the five year period from 2017-18 with one of the key objectives being identifying and delivering £7m of savings for the HRA.

Action 24: Continue to work with council tenants and leaseholders on the development of Tower Hamlets Homes and to consider extending the current management agreement.

7.2 Tower Hamlets Forum: working with our registered provider partners

The council works in partnership with around 50 housing associations in the borough, half of whom are members of the Common Housing Register, who collectively own and manage more homes than the council.

Specific areas of partnership working between the council and housing associations are:

- Preferred Partners Agreement - where certain housing associations which develop new housing in the borough are accredited by the council as preferred partners
- Common Housing Register Allocation Scheme – which is the council's and local housing association partners' allocation scheme for the borough
- Common Housing Register Agreement - where all new and empty homes that become available to occupy are allocated to applicants in need on the basis of the allocation rules set out in the Allocation Scheme

Some of our local housing associations – Poplar Harca, Eastend Homes and Tower Hamlets Community Housing – were set up by the council to deliver decent homes, improvements, new homes and broader regeneration outcomes which they have been undertaking.

With the government's recent decision to force housing associations to reduce their rents by 1% for four years, has meant that housing associations nationwide are progressing discussions about merging. Although a 1% reduction for four years doesn't sound much, this reduction has had a profound impact on housing association financial planning. This has impacted on the council (through Tower Hamlets Homes) too with difficult decisions having to be made about future investment. The impact on housing associations' business plans – particularly those who are developing new homes – is causing some organisations to pursue merger opportunities to insulate themselves from potential future financial difficulties.

We're concerned that such mergers will have a negative impact on local service delivery and negatively impact on broader strategic investment decisions. We are particularly keen that Tower Hamlets based local housing associations stay locally focused and accountable and we will work with the statutory authorities – principally the Greater London Authority and the Homes and Communities Agency - to make sure this remains the case.

A further issue is the government's stated intention to deregulate the housing association sector. What this means in practice will emerge over time, but our concern is that agreements and understandings in place on issues such as nomination agreements; responsibility to house homeless households; and council rights to nominate members to housing association boards will loosen.

The large majority of new affordable housing for rent will be delivered by housing association partners, most of whom are members of the council's Preferred Partners Panel. We intend to maintain this Panel but recognise that there will be difficulties ahead as with the trend with mergers, there will be fewer developing housing associations and the ability of the council to prescribe who builds what affordable housing.

The council is keen to support the work and independence of borough-focused registered providers and are prepared to work with them to assess how their investment capacity can be maximised to meet the major development and regeneration opportunities that remain in the borough. Ideally new housing that is developed by local partners in the borough, in partnership with the council (possibly with the support of the Mayor of London), can enhance the position of our local partners.

Action 25: Develop more effective working with registered providers operating in the borough delivering local priorities remain local, independent and accountable to residents. To achieve this, the council will seek to:

- crystallise this effective working relationship in the form of a covenant that sets out the obligations that the council and its registered partners have to each other and the residents that we work for in order to support local housing associations deliver our shared objectives.
- continue its partnership working arrangements with registered providers through the Common Housing Register and through a review of the Preferred Partnering Protocol.
- review how in partnership with borough-focused registered providers investment capacity can be maximised to meet major development and regeneration challenges that remain in the borough.

7.4 Other local authorities

Tower Hamlets works with its partner authorities in the East London Housing Partnership on a range of housing issues and will continue to do so as many of the issues we face in Tower Hamlets are faced by our neighbouring authorities also. As set out earlier in this document, the council is looking beyond our borough boundaries (and beyond East London) to deliver new housing options. We will need to be sensitive in our approach and work on a partnership basis and see where possible shared priorities can, if possible, be met.

Action 26: Continue to work in partnership with our East London neighbouring authorities and develop new partnerships where the council is seeking to meet its housing needs.

7.5 Private sector partners

The council works with private sector partners on a daily basis, not least through negotiating affordable housing through the planning process, usually called S106 legal agreements. These agreements require developers to deliver certain obligations in return for a planning consent. There is a broader and perennial challenge of negotiating social value from private sector investment. This is not exclusively about housing, but connects with the earlier priority to help ensure local people have access to quality employment opportunities.

Action 27: Continue to work in partnership with private sector partners to generate better employment opportunities for local people.

7.6 Third Sector Partners

Core to our partnership approach is working with third sector agencies many of which are members of the Tower Hamlets Council for Voluntary Service. Whilst many employ members of staff they are by definition reliant on people giving their time and money voluntarily to help support people who make up the Tower Hamlets community. One of their major assets is their contribution to filling the service gap that public and private sector agencies are unable to fill, nurturing community activities and services and providing forums for people to meet and interact, fostering community cohesion.

Action 28: Continue to work in partnership with third sector partners to generate better employment opportunities and broader community regeneration outcomes for local people.

Section 8 – Our approach to equalities

The Equality Act 2010 places equality mandatory duty on local authorities (and other public bodies) to protect people from discrimination in the workplace and in wider society. To meet this duty, the Council needs to consider all individuals when carrying out their day-to-day work when shaping policy, in delivering services and in relation to their own employees. It also requires that public bodies to:

- have due regard to the need to eliminate discrimination
- advance equality of opportunity
- foster good relations between different people when carrying out their activities

The adoption of the Housing Strategy and associated documents requires the Council to undertake an Equalities Impact Assessment (EqIA) to fully assess what the positive, negative or neutral impacts of adopting the documents will be on defined equality groups. The nine relevant protected characteristics of these groups are:

- age
- disability
- gender reassignment
- Marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

An initial Equality Assurance Checklist has been completed which does not identify an adverse impact from these proposals on the equality groups of the nine protected characteristics. A full assessment of individual policies such as the Allocations Scheme and Homelessness Strategy will be carried out and if any potential negative impacts are identified mitigating actions will be identified accordingly.

Respondents to the consultation on the Housing Strategy 2016 – 2021 Consultation document have been requested to be mindful of the duty placed upon the Council in relation Equality Act 2010 and are asked to identify any potential impacts of the proposals contained in this document on the equality groups accordingly. A full Equality impact Assessment will be carried out and presented to the Council for consideration when the document is taken forward for approval in November 2016

9. Financial Overview – Resourcing the delivery of the housing strategy

9.1 When framing a housing strategy and identifying policy actions to deliver them, the next issue to consider is resources. Work will need to be undertaken to ensure responsibilities are allocated to officers. This section sets out in broad terms a financial overview of the environment in which the council and its partners work within. The focus is primarily on the funding the delivery of new affordable homes.

9.2 Government Funding

9.3 The government has set out in clear terms its policy towards housing and particularly council housing in its 2016 Housing and Planning Act which is described in Section 3 of this document. The government plans to end the issuing of lifetime tenancies; require council landlords to sell its own higher value homes to fund the extension of the right to buy for housing associations; and have imposed a reduction in rents over a four year period on all social landlords. The government has also made clear that the future funding for new affordable housing will be focused principally on affordable home ownership through shared ownership and starter homes programmes, neither of which are likely to be affordable to most people in the borough on low to medium incomes. Therefore the council is not expecting any significant support from central government to meet the significant housing challenges the council and its partners are facing.

9.4 Greater London Authority Funding

9.5 The GLA on behalf of the Mayor of London administers funding programmes that channel funding available from government to build new affordable housing. The GLA in recent years has promoted Housing Zones which take a longer term, more holistic area-focused approach to realising large scale development opportunities. In Tower Hamlets, there is a Housing Zone for Poplar Riverside which is expected to deliver 9,000 new homes.

9.6 In tandem with this, significant interventions in the field of estate regeneration have been undertaken using a model of demolishing council homes to be replaced with a mix of private for sale; shared ownership; and housing association homes (usually for tenants displaced by the works) has been successfully undertaken all over London, with Tower Hamlets one of the leading agencies for change. We expect this trend to continue and the GLA are funding schemes under its Estate Regeneration Fund to achieve this.

9.7 At the time of writing, a financial settlement between the Mayor of London and the government had yet to be announced, but it is clearly likely to be less generous than previous funding rounds, but still set alongside more ambitious targets. This settlement will provide funding for new affordable housing from 2018 onwards, probably over three years, but longer for Housing Zones schemes. The GLA would normally have regard to their own Housing Strategy and London Plan when considering what priorities it wants to fund and on what terms. But it is noted that the current London Plan and Housing Strategy are quite different to the stated housing ambitions of both the Mayor and central government, so it is to be expected that both strategies will be significantly revised in the coming year.

9.8 Given the borough hosts three Mayor of London Opportunity Areas (where opportunities for major housing growth have been identified as described in Section 4.1 of this document) the council and its partners are well positioned to be recipients of new funding. New funding is likely to be increasingly focused on equity loans

rather than grant. This is particularly useful for the initial stages of major regeneration projects which require 'front funding' to help buy out leaseholders and undertake enabling work, but this money does need to be paid back to government in the future with the intention of recycling it for interventions elsewhere.

9.9 A major issue in Tower Hamlets continues to be the high cost of land and associated enabling costs. In value for money terms, schemes delivering affordable housing in outer London where land prices are lower are likely to look more attractive. The adoption of the National Planning Policy Framework and the impending introduction of the Starter Homes Initiative means it will be increasingly difficult to require private developers to provide affordable housing for rent and for the future, it is increasingly likely that the council itself will be the change agency using its own land, money and efforts that will deliver the affordable rented housing it clearly needs.

9.10 **Tower Hamlets Council Funding**

9.11 The council's Cabinet considered in July 2016 a report entitled 'Housing Revenue Account: Outline 30 Year Business Plan and Medium Term Financial Outlook'. The HRA relates to the activities of the Council as landlord of its dwelling stock, and the items to be credited and debited to the HRA are prescribed by statute. Income is primarily derived from tenants' rents and service charges, and expenditure includes repairs and maintenance and the provision of services to manage the Council's housing stock. The HRA also benefits from some but not all of right to buy receipts and can benefit from other funds, such as the government's new homes bonus.

9.12 The HRA is self-financing, no longer reliant on government subsidy, meaning the council needs to plan carefully and prudently for the future, ensuring there is sufficient funding to meet its landlord obligations to its tenants and leaseholders over the medium to long term. The original intention was to give local authorities greater freedom to use their assets and income, but in 2015 it was announced that social rents would be reduced by 1% for four years beginning in 2016/17. Combined with the pay to stay proposals and sale of higher value empty council homes, these initiatives have had a negative impact on the scope of what the council would like to do in the future.

9.13 Despite the difficult position the council finds itself in due to the government announcement on rents in 2015, over the next 30 years, the council expects to spend over £1bn (today's prices) on maintaining its stock as well as funding a significant programme of new council home building. The council has a programme of over 500 new council homes to be built (See Section 4.3) with a commitment to build a total of 1,000 council homes by 2018.

9.14 To deliver the housing strategy commitments – particularly those focused on new housing delivery – the council will need to be flexible in its approach in order to realise new priorities and initiatives that emerge in the future. Inevitably this will involve close partnership working our development partners and residents of the borough, using what land, money, borrowing powers and people resources to maximum effect.

9.15 **Tacking Fraud**

As important as ensuring the Council achieves best value through the use of existing resources is to ensure that fraudulently activity is tackled to ensure the scarce homes available are used to meet the needs of those identified through the Council's allocations scheme..

High rents in the private sector and the close proximity of Tower Hamlets to the City and Canary Wharf creates conditions which can make sub-letting attractive. The Council will seek to develop existing collaborative working arrangements to target use of social/affordable rent/home ownership homes for sub-letting activity and commercial gain as well as being diligent in its scrutiny of Right to Buy applications which attract substantial discounts for those purchasing.

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Section 10 – Housing Strategy Actions

<p>Delivery Theme 1 – More affordable housing, economic growth and regeneration</p>
<p>Action 1: Maximise affordable housing building from all sources of housing supply, with a focus on the borough’s three opportunity areas</p>
<p>Actions 2:</p> <ul style="list-style-type: none"> • Use council-owned sites to deliver 100% rented housing combining social target rents and homes at ‘living rent’. • Use council-owned sites to develop higher rent homes let to applicants from a separate waiting list and potentially developed by a council owned Housing Company. • Reduce government defined Affordable Rents to lower levels including social target rents taking into account the possible reduction in overall affordable homes for rent. • Plan for emerging Government policy, in particular the proposed requirement to deliver 20% Starter Homes on schemes over 10 units as part of the affordable housing offer. • Review its policy regarding commuted sums for affordable housing, with the aim of: <ul style="list-style-type: none"> ▪ Creating mixed and sustainable communities ▪ Considering the overall output of affordable housing ▪ Making best use of Council owned land/assets. • Develop clear policy for market sale, for discounted market sale including Starter Homes and shared equity schemes with reference to evidence available regarding take up of subsidised home ownership schemes. • Explore long term financial investment from institutions for an intermediate rent product for households with average/median incomes.
<p>Action 3: Complete a full capacity study of Council owned land site (within the Housing Revenue Account and the General Fund) to identify opportunities and funding options.</p>
<p>Actions 4:</p> <p>Explore the merits of creating a Social Lettings Agency that can help offer more housing options for homeless people and others in housing need.</p> <p>Set up a housing company to deliver new homes both inside and outside the borough.</p> <p>Explore the merits of the developing a co living model of housing for working people.</p> <p>Explore the merits of the council buying or developing its own accommodation to meet emergency and temporary housing needs for homeless households.</p>
<p>Action 5: Ensure new developments are built to near zero energy high efficiency targets and through carbon offsetting initiatives the Council will deliver residential energy improvement projects.</p> <p>Building on the Mayor of London’s earlier Housing Design Guide, the council will seek the highest quality housing standards in new affordable housing built in the borough.</p>
<p>Action 6: Investigate the use of modular housing to assist in meeting housing need across the Borough.</p>
<p>Action 7: Analyse the register of self builders in line with statutory requirement and in order to inform the Local Plan and respond to self and custom build.</p>

Delivery Theme 2 - Meeting people's housing needs
Action 8: Develop a new employment strategy to help ensure local job opportunities are maximised for local people.
Action 9: Refresh the Common Housing Register Allocation Scheme to widen housing options for the council to give priority to those in housing need and use private rented housing and other suitable accommodation to meet housing needs.
Action 10: Develop and implement an intermediate housing register.
Action 11: Refresh our Homelessness Statement (Strategy) and align it with the 2016-21 Housing Strategy.
Action 12: Reconvene the Homelessness Partnership Board.
Action 13: Refresh the Tenancy Strategy to take account of legislative changes requiring local authorities to issue fixed term tenancies.
Action 14: Keep under review the Overcrowding and Under-occupation Plan.
Action 15: Contribute towards the development of the Corporate Ageing Well Strategy which includes reference to developing accommodation designed to meet the needs and wishes of older people.
Action 16: Support the development of the Accommodation Plan for People with Learning Disabilities (PWLD) and autism.
Action 17: Work closely with colleagues and partners to support the most vulnerable people in the borough and continue to meet their housing needs.
Action 18: Assess the existing and future requirements for the gypsy and traveller communities.

Delivery Theme 3 - Raising private rented housing standards
Actions 19: Review selective/additional licensing schemes for private rented sector; explore options for a scheme for houses in multiple occupation; and lobby government to use legal powers available adopt a wider licensing scheme where necessary.
Action 21: Adopt an updated private sector housing strategy for 2016-21 which includes reference to the Better Care Fund approach and addressing empty homes issues.
Action 21: Adopt an updated private sector housing renewal policy for 2016-21 which includes reference to the Better Care Fund approach and addressing empty homes issues.
Action 22: Develop an evidence base on the extent of Buy to Leave in the Borough and if necessary review the action the Council could take to reduce the number of new homes that are being purchased but being left empty by investors and by owners of existing empty properties.
Action 23: The council will continue to undertake its statutory responsibilities to ensure private rented sector housing is safe to live and is well managed.

Delivery Theme 4 - Effective partnership working with residents and stakeholders

Action 24: Continue to work with council tenants and leaseholders on the development of Tower Hamlets Homes and to extend the current management agreement.

Action 25: Develop more effective working with registered providers operating in the borough delivering local priorities remain local, independent and accountable to residents. To achieve this, the council will seek to:

- crystallise this effective working relationship in the form of a covenant that sets out the obligations that the council and its registered partners have to each other and the residents that we work for in order to support local housing associations deliver our shared objectives.
- continue its partnership working arrangements with registered providers through the Common Housing Register and the Preferred Partnering Protocol.
- review how in partnership with borough-focused registered providers investment capacity can be maximised to meet major development and regeneration challenges that remain in the borough.

Action 26: Continue to work in partnership with our East London neighbouring authorities and develop new partnerships where the council is seeking to meet its housing needs.

Action 27: Continue to work in partnership with private sector partners to generate better employment opportunities for local people.

Action 28: Continue to work in partnership with third sector partners to generate better employment opportunities and broader community regeneration outcomes for local people.

Annex A - Glossary of Terms

Affordable Rented Housing – comprises two forms of affordable rented housing.

- Social rented housing is usually owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime.
- Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80 per cent of the local market rent (including service charges, where applicable).

Arms Length Management Organisation (ALMO) – an organisation set up and owned by the council to manage its housing stock. The ALMO in the borough is called Tower Hamlets Homes.

Assured Tenancy – The type of tenancy issued by housing associations which are ‘lifetime’ tenancies. For new tenants, these are preceded by a ‘Starter Tenancy’, usually for one year.

Assured Shorthold Tenancy – The type of tenancy issued by housing association landlords which are fixed term tenancies. These are usually for five years, but can be as short as two years or longer than five years. Private landlords also use this tenancy, but usually issue them for shorter periods, between 6 months and year, but can be longer.

Common Housing Register Allocation Scheme – The council is required by law to produce a Housing Allocation Scheme. In Tower Hamlets, the council works in partnership with local housing associations to produce a joint document, the Common Housing Register Allocation Scheme. This document sets out the policies which decide who can go on the register which may mean being allocated affordable rented housing in the borough. The scheme also sets out how homelessness needs are met.

Commuted Sums – See S106.

Department for Communities and Local Government (DCLG) – The government department of state responsible for housing, planning and regeneration, which also sponsors the Homes and Communities Agency.

Fixed Term Tenancy – The type of tenancy issued by local authority or ALMO landlords which are for fixed terms. These are usually for five years (but can be for longer), but can be as short as two years or longer than five years. These tenancies have the same rights and conditions as Secure Lifetime Tenancies, but are for fixed terms.

Greater London Authority – comprises the Mayor of London; London Assembly; and the staff who support their work. It is the capital’s strategic regional authority, with powers over transport, policing, economic development, housing, planning and fire and emergency planning. The Mayor is responsible for producing the London Housing Strategy and the London Plan. The council’s housing strategy and local plan need to be in general conformity with the Mayor’s documents.

Homes and Communities Agency (HCA) – The government appointed regulator of housing associations who are registered with the HCA, i.e., registered providers. The HCA provides governance and financial viability ratings for individual housing associations.

Housing Allocation Scheme – See Common Housing Register Allocation Scheme.

Houses in Multiple Occupation (HMOs) – are privately rented homes where residents occupy individual rooms and use the kitchen/bathrooms on a shared basis. These can be homes which are houses, maisonettes or flats. If the home is three storeys or more, it needs to be licensed by the council for occupiers use. Increasingly HMOs can be found in former council rented and our stock transfer partners' properties.

Housing Associations – are social landlord organisations which are not local authority landlords, who provide affordable rented accommodation. Housing associations registered with the Homes and Communities Agency are known as 'Private Registered Providers' and used to be known as Registered Social Landlords (RSLs).

Intermediate Housing – A broad term to describe accommodation which is intended to be affordable for working households available for rent; ownership or a combination of rent and ownership. Such households do not usually qualify to go on the Common Housing Register but are not able to afford housing on the open market for private rent or ownership.

London Living Rent - Not an official term but widely understood as rent that could be offered in new 'intermediate' affordable homes. It's based on the principle that rents shouldn't be more than around a third of what people earn.

Secure Lifetime Tenancy - The type of tenancy issued by councils or ALMOs which are 'lifetime' tenancies. For new tenants, these can be preceded by an 'Introductory Tenancy', usually for one year.

Local Plan – A local authority planning document that sets out the council's proposed planning and land allocation policies over a set period of time.

Low Cost Home Ownership (LCHO) – A form of affordable housing that is available for sale at less than open market values, either through shared ownership or at a discounted price.

Private Rented Housing – Accommodation let by private landlords at market rates, usually on an Assured Shorthold Tenancy.

Registered Providers – Housing associations which are registered as providers of affordable housing with the Homes and Communities Agency (HCA).

S106 – is a legal agreement between a developer and the council for the developer to provide specific community contributions in return for the council granting planning consent for a scheme. These community contributions can be money – commuted sums – to go towards build of schools, health facilities, or affordable housing. Alternatively it can be an agreement to do certain things, for example, environmental improvements or provide affordable housing. The housing is usually provided through the developer contracting with a housing association.

Shared Ownership – An intermediate housing product available from housing associations (and more recently other bodies) whereby the applicant buys a share of a home (not less than 25%) and rents the remainder.

Starter Homes – A government-sponsored affordable housing product which will be available to buy at no more than £450,000 (or £250,000 outside London) and no more than

80% of local market values. The government wants to require local authorities to deliver Starter Homes through private developers.

Tenancy Strategy – A statutory local authority document that sets out its policy on the types of affordable housing tenancies (i.e., lifetime tenancies or fixed term tenancies) they wish to see granted by Registered Providers in their areas and on what terms they think the tenancies should be renewed.

Tower Hamlets Homes – The council's arms length management organisation (ALMO) which manages the council's housing stock.

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London Borough of Tower Hamlets

Draft 2016-21 Homelessness Strategy Outline

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Section 2 - What we say about homelessness in our Draft 2016-21 Housing Strategy (July 2016), reviewing progress that we have made

Section 3 - Reviewing the Homelessness Statement 2013-17

Section 4 - Options to inform the development of the council's 2016-21 Homelessness Strategy:

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Theme 2 - Access to Affordable Housing Options

Theme 3 - Children, Families and Young People

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Section 1 – Reasons for a Homelessness Strategy

Introduction

A local authority with housing responsibilities – a local housing authority – under the 2002 Homelessness Act may carry out a homelessness review for their district and following that may formulate and publish a homelessness strategy based on the results of that review. It is expected that such strategies should be refreshed every 5 years.

Tower Hamlets Council previously adopted a *Homelessness Statement 2013 to 2017* which set out the council's approach to both addressing homelessness needs as defined by legislation – meeting its statutory duties - and what advice and support it was able to give to help prevent homelessness.

The council has decided to adopt a new 2016/21 Housing Strategy which sets out in broad terms the council's broad approach to housing in its area. In connection with this, the council has decided to refresh its *Homelessness Statement 2013 to 2017*, building on what has been achieved; introducing new policy actions; and aligning the new document with the council's new housing approach. An important document to read in conjunction with this document is the Common Housing Register Allocation Scheme (also being refreshed in 2016) which sets out in more detail how the council and its registered provider partners intend to meet its statutory homelessness duties.

National Policy – Legislation and Guidance

In addition to the statutory requirements of the Housing Act 1996 as amended by the Homelessness Act 2002, the government from time to time issues guidance, for example on allocations, and also information on how local housing authorities can address specific issues, such as rough sleeping. Also published are Regulations that set out in more detail the requirements of legislation.

The Localism Act 2011 was intended to allow local authorities more flexibility when managing or allocating accommodation. The provisions included the power for local authorities to discharge their full homelessness duty by providing suitable private rented accommodation for people who applied after November 2012, regardless of whether the homeless person agrees.

An important document for consideration when framing the housing allocation scheme is the *DCLG Allocation of accommodation: guidance for local housing authorities in England (June 2012)*. This makes clear that people who are homeless should be given reasonable preference – a head start on some other applicants - when determining housing priorities.

The government also published a *Vision to end rough sleeping: No Second Night Out nationwide* (July 2011) which sets out six commitments related to people who sleep rough which are focused on:

- Helping people off the streets
- Helping people to access healthcare
- Helping people into work
- Reducing bureaucratic burdens
- Increasing local control over investment in services
- Devolving responsibility for tackling homelessness

The principle behind No Second Night Out is that a person's or household's housing crisis may mean they are homeless for one night, but that there should be a sufficiently wide ranging, flexible suite of services available from local authorities that ensure that they are not roofless for a second night.

The government published *Making every contact count: a joint approach to preventing homelessness (2012)* which stated that:

Effectively preventing homelessness goes beyond addressing immediate housing needs and requires a sustained commitment across all agencies to address the underlining causes of homelessness. These are often: unemployment, low skills levels, substance misuse, mental health issues, crime and dysfunctional family background.

The document highlighted the need to recognise that homelessness is often one symptom of a wider range of challenges applicants are facing and that such needs need to be met in a holistic fashion. This involves a considerable degree of cross departmental and inter-agency working and happens on a regular basis and it's clear that this kind of working is likely to increase.

For the future, it is expected that the government will be placing a homelessness prevention duty on local housing authorities in England replicating the duty adopted in Wales. Whilst this duty is not in place, this appears to be the direction of travel of national policy and the council will need to be giving early thought to how this requirement can be met at a time of increasing homelessness demand and diminishing resources. The council already provides assistance to non-priority homeless households on a discretionary basis, which closely mirrors the Welsh system. Subject to the detail of future legislation, if this responsibility becomes statutory, there are likely to be additional costs associated with the services required.

Regional Policy - Homes for London – The London Housing Strategy (June 2014)

The Mayor of London has a statutory duty to publish and consult on a housing strategy for the capital, which needs to be aligned with his London Plan. The current strategy was adopted by the previous Mayor of London, Boris Johnson, and the council expects the recently elected Mayor, Sadiq Khan, to set in train a process to revise the current document.

There are two specific policy commitments homelessness which centre on working with boroughs to reduce rough sleeping and promoting the use of NOTIFY and the pan-London inter-borough accommodation agreement when placing homeless households in out of borough accommodation. The council will continue to help deliver the two policy commitments set out in the current housing strategy and will work with the new Mayor on new strategy and policy commitments designed to reduce homelessness and rough sleeping.

In conclusion

Ultimately, a sustained increase over the medium to long term in the provision of affordable rented accommodation (and associated supported housing) would lead over time to a reduction in reported homelessness. The amount of funding available to support the delivery of affordable rented housing supply across the capital is likely to fall given the government's commitment to supporting low cost home ownership accommodation. The situation is further exacerbated by trends in the private rented market.

The ending of Assured Shorthold Tenancies in the private rented sector has become the main cause of homelessness in London. This, combined with the fact that local housing allowance has been frozen since 2011 at a time when private rents in London have increased substantially has meant the private rented sector is an increasingly unaffordable and unsustainable housing option for people who are on average or low incomes and threatened with homelessness. This in turn is likely to result in homelessness continuing to have an upward trajectory.

The council has also struggled to procure affordable private sector temporary accommodation to fulfil its statutory duties to homeless households, resulting in a substantial increase in the cost of temporary accommodation to the general fund. Nevertheless there are occasions when suitable, affordable private sector options arise which can help prevent or relieve homelessness.

Given the availability of affordable private rented accommodation is likely to diminish, unless local housing allowance and temporary accommodation subsidy are increased to more closely match market rents, the council needs to actively plan for a future with the objective of diversifying the supply of temporary accommodation thereby reducing the dependence on expensive PRS stock and achieving an affordable pipeline of accommodation for the prevention and relief of homelessness. This will mean:

- Reviewing what accommodation we have access to now
- Creating our own portfolio of temporary accommodation and taking a strategic view on which areas this accommodation should be located
- Increasing the use of general needs accommodation for temporary accommodation purposes
- Securing our own emergency accommodation to reduce and ideally end the use of bed and breakfast accommodation
- Ensuring that available accommodation is allocated on need, and that the Council exercises its powers and ensures its lettings policy enables an annual reduction in the number of households in temporary accommodation.
- Proactively monitoring the financial welfare of households who are likely to be impacted by the benefit cap to prevent homelessness

This homelessness strategy is about how the council intends to meet the local impact of this trend. This will involve considering a range of permanent and temporary housing options described later in this document to meet these needs, both in the borough and outside it.

Section 2 - What we say about homelessness in our Draft 2016-21 Housing Strategy (July 2016) and reviewing progress that we have made

The Draft 2016-21 Housing Strategy sets out the following on its approach to homelessness.

Homelessness Strategy

The council currently has in place a Homelessness Statement 2013 to 2017 which sets out our approach to preventing and reducing homelessness focused on:

- *Homeless prevention and tackling the causes of homelessness*
- *Access to affordable housing options*
- *Children, families and young people*
- *Vulnerable adults*

Many aspects of this document are still relevant particularly those related to partnership working and prevention but over the next 12 months we will consider what other options are available to prevent and meet homelessness demand. These will include:

- Use of Temporary accommodation for homeless families

The Homelessness Strategy will also need to consider the options to reduce the number of homeless households from Tower Hamlets who are currently in temporary accommodation. At present there are around 2,000 households in temporary accommodation, of whom over 1,000 are outside the borough. Over 200 households are in bed and breakfast accommodation.

This form of accommodation creates uncertainty and upheaval for residents and is becoming increasingly expensive for the Council to procure, with suitable accommodation proving too expensive in borough resulting in more households being placed in outer London and beyond.

The Council needs to agree how best to tackle this problem with potential solutions including:

- *developing its own temporary accommodation as set out above*
- *using existing permanent council and registered provider properties for short term homeless housing,*
- *continuing to use homes temporarily on estates that are being decanted for regeneration*
- *continue publishing under what circumstances it will place households outside of the borough*
- *buying back ex-Local Authority homes sold under the Right to Buy*

We will update the homelessness document to reflect progress over the past 3 years and will engage fully with all partners in 2017 to develop a further 4 year action plan to continue to tackle homeless. There will be an emphasis on ensuring the most vulnerable and marginalised groups who face homelessness can continue to be assisted linking their support into their health needs, education and employment chances and overall wellbeing.

Progress since 2013 includes:

- ***No wrong door Project***

The Council's Housing Options service introduced its innovative programme – called No Wrong Door to ensure that customers can access all the services they need to help resolve their housing problems from one point of contact rather than having to navigate their way through lots of different agencies themselves.

The Council's Housing Options service has been transformed to offer more help to those threatened with homelessness or needing housing advice. Instead of being able to simply offer advice on housing options, staff are working closely with other agencies so as to be able to offer information on a comprehensive range of services that help with problems that often cause homelessness or housing difficulties. This includes money advice, debt counselling, landlord and tenant mediation, specialist legal advice, help in accessing education and training, help in seeking work, access to child care and our Children's Centres.

Our Housing Options staff can make referrals to other agencies to ensure clients get the help they need, and some support services are now operating from Albert Jacob House in Bethnal Green E2 the where Housing Options staff are based.

- Overview and Scrutiny Commission recommendations

The Overview and Scrutiny Commission held a review of the Homelessness Services and produced 17 recommendations for consideration by the Housing Options Team. These recommendations are being addressed by the service and will either be implemented at an operational level or through the revised Homelessness Statement.

- Hostel Commissioning Plan

The Council is developing a Hostel Commissioning Plan (HCP) 2016-2019 which is subject to approval by the Mayor in July 2016.

- Homelessness Partnership Board

The Council will reform its Homelessness Partnership Board drawing on the expertise of Housing Association, voluntary sector and other statutory partners such as the health services to oversee the production, delivery and monitoring of the action plan.

Action 11: Refresh our Homelessness Statement and align it with the 2016-21 Housing Strategy.

Action 12: Reconvene the Homelessness Partnership Board

Section 3 – Reviewing the Homelessness Statement 2013-17

The council currently has in place a *Homelessness Statement 2013 to 2017* which sets out our approach to preventing and reducing homelessness focused on:

- Homeless prevention and tackling the causes of homelessness
- Access to affordable housing options
- Children, families and young people
- Vulnerable adults

Many aspects of this document are still relevant particularly those related to partnership working and prevention but over the next 12 months we will consider what other options are available to prevent and meet homelessness demand. In addition this strategy will also review the Council's approach to meeting its statutory accommodation duties to homeless households as set out above.

There will be an emphasis on ensuring the most vulnerable and marginalised groups who face homelessness can continue to be assisted linking their support into their health needs, education and employment chances and overall wellbeing.

Section 4 - Options to refresh the current Homelessness Statement to inform the development of the council's 2016-21 Homelessness Strategy

The themes to the council's approach are based on those previously adopted in the Homelessness Statement adopted in 2013. In that document was set out our overall approach to meeting homelessness needs and preventing its causes in the borough.

Aim

The overall aim of the statement is to tackle and prevent homelessness in Tower Hamlets. This includes:

- Preventing homelessness
- Supporting those who are homeless or at risk of homelessness
- Providing accommodation for homeless households

An important additional tenet to the final Homelessness Strategy will be a stronger focus on:

- Reducing the net number of people in Temporary Accommodation

Principles

Throughout discussions with partners there were common ways of working highlighted as being crucial to our achievements thus far as a partnership, and would be even more important in light of the new challenges and opportunities facing the borough. These ways of working have been grouped into three interdependent principles. These principles are intended to guide how we work together as partners, and as individual organizations, to prevent homelessness and provide services for homeless people. They are based on a recognition that the causes of homelessness are complex and multifaceted and therefore need a multifaceted approach. The principles are:

- Multi-agency working
- Early intervention
- Building resilience

An additional principle for the Homelessness Strategy that is finally adopted is:

- Increased property interventions

This has been added because the council needs to diversify its temporary accommodation portfolio and reduce the general fund costs associated with the supply of temporary accommodation.

Multi-agency working - The Homelessness Strategy is a partnership statement: multi-agency working is therefore paramount to the implementation of the statement. Taking a multi-agency approach to service provision is about agencies working together to better understand the needs of, and achieve the best possible outcomes for, families and individuals. As a partnership this will require us to actively share and make better use of information, expertise and resources to provide seamless, holistic services for homeless people and those at risk of being homeless.

Early Intervention - There is a growing body of evidence at the national and local level pointing to the importance of intervening early to improve outcomes for service users and

reduce costs to services. As a partnership, we are committed to taking a proactive approach to homelessness and moving away from simply reacting to crisis, both from a preventative perspective as well as in providing support services for homeless households.

Building resilience - The weakening of welfare support and a continually challenging economic climate will place increasing pressures on households and the ability of services to respond to growing needs. A key aspect of our approach to homelessness needs to centre on assisting people to be better able to assist themselves and take control over their own lives.

It is a commitment by partners to support and empower people and families to develop the skills, competencies and resources needed to successfully respond to challenges, be they economic, social or personal, and avoid reaching crisis point. It therefore requires a recognition and understanding of the multi-dimensional issues that make it difficult for people to cope with life events.

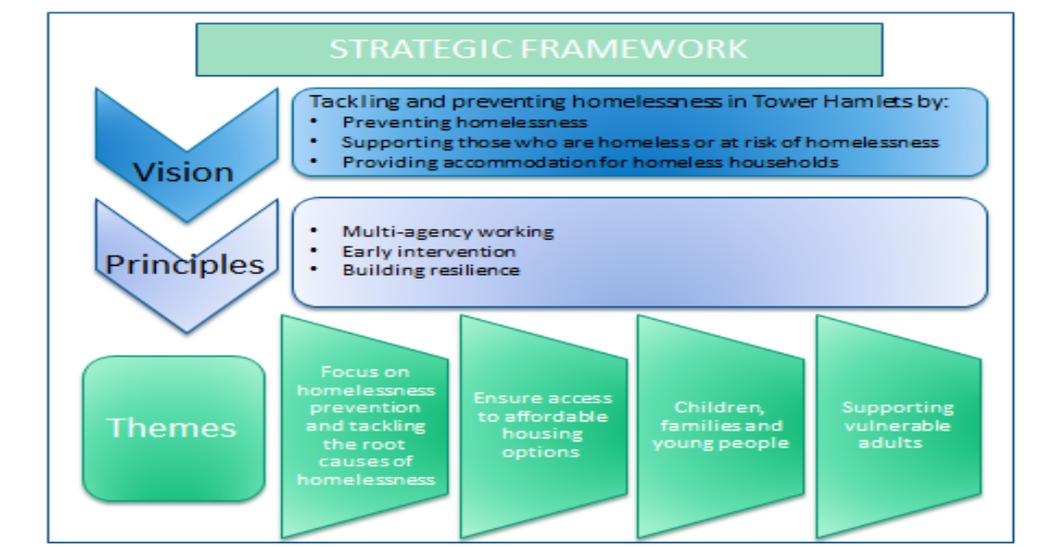
Increased property interventions – Means the council increasing and widening its portfolio of affordable temporary accommodation.

Themes

Using the findings from the evidence base and consultation with agencies, four key themes or strategic objectives have been identified as the basis of structuring the new Homelessness Statement, each with its own thematic objectives:

- Focus on homeless prevention and tackling the root causes of homelessness
- Access to affordable housing options
- Children, families and young people
- Supporting vulnerable adults

In diagrammatic terms, the approach can be illustrated as follows:



Theme 1: Homeless Prevention and Tackling the Causes of Homelessness

Objectives

Provide quality, timely and accessible information and advice focused on homeless prevention and support by:

- Ensuring that there is clear and consistent information at all key contact points for homeless households and those at risk of being homeless.
- Improving the quality and accessibility of housing and homelessness advice services and pathways.

Support people to remain in their homes by:

- Working proactively with social and private landlords to identify and support people at risk of losing their homes and assist tenants to maintain their tenancies.
- Providing advice and support for people at risk of losing their homes.
- Providing financial inclusion and income maximization advice and support for residents, particularly those at risk of losing their homes.
- Mitigating where possible the impact of welfare reform on homeless and formerly homeless people.

Address the root causes of homelessness as part of a partnership approach to tackling worklessness and exclusion by:

- Providing employment support and pathways to employment for households at risk of homelessness and exclusion.
- Strengthening strategic commitment and joint working on homelessness prevention and exclusion.
- Making better use of information and intelligence across the partnership to tackle homelessness and exclusion.

Theme 2: Access to Affordable Housing Options

Objectives

Increase the supply of housing across all tenures by:

- Working in partnership with housing providers and developers, to continue to provide new affordable homes.
- Identifying potential funding opportunities to develop new council homes.
- Bringing empty properties back into use.

Develop innovative and sustainable housing options in the private sector by:

- Improving the accessibility of the private rented sector as a continued opportunity to prevent homelessness, recognising that caps on Housing Benefit allowances influence affordability considerations
- Ensuring that the private sector offers safe and good quality housing options
- Creating a council-owned housing company to provide accommodation including both new build homes and existing properties.

Maximise the use of the existing social housing stock by:

- Ensuring that the common housing register allocation scheme reflects need and availability of accommodation
- Using general needs social housing as temporary accommodation

Ensure that there is a sufficient supply of appropriate temporary accommodation and reduce the time spent in temporary accommodation by:

- Developing a sustainable approach to procuring temporary accommodation.
- Supporting homeless households in temporary accommodation to secure settled accommodation.
- Adopting a Hostel Commissioning Plan for 2017-20 (subject to approval by the Mayor).
- Exploring the potential of purchasing accommodation to meet emergency housing need.
- Developing a portfolio of affordable temporary accommodation.

Theme 3: Children, Families and Young People

Objectives

In order to prevent families and young people becoming homeless, and provide appropriate support packages for those who do, we will:

Prevent homelessness among families and young people as part of an integrated approach to youth and family services by:

- Improving joint working across agencies to focus on homelessness prevention and early intervention for families and young people.
- Improving the use of mediation and respite to address family breakdown as a cause of homelessness.

Support homeless families and young people to be safer, healthier and emotionally and economically resilient by:

- Providing better support services for homeless families.
- Support homeless young people to achieve their full potential and positively progress to adulthood.

Theme 4: Vulnerable Adults

Objectives

In order to provide targeted support for vulnerable homeless adults and support them to live independently, we will:

Better identify the needs of vulnerable people through a personalised, multi-agency approach by:

- Improving the assessment of vulnerable adults, particularly those with multiple needs.
- Ensuring that structures and processes are in place to support a multi-agency approach to assessing vulnerable adults.

Address and reduce the support needs of vulnerable homeless people to enable them to live independently by:

- Developing a joint commissioning approach for homeless adults with complex needs, including substance misuse and mental health
- Having no new people spending a second night on the streets and reduce the number of people who are living on the streets.
- Improving move-on options for people in hostel accommodation and independent living skills of homeless people.
- Ensuring victims of Domestic Violence are supported and their housing needs are met.
- Supporting sex workers in their transition to a safe exit.
- Supporting ex-offenders to keep their homes or find suitable accommodation on return from prison.

August 2016

London Borough of Tower Hamlets

2016-21 - Private Sector Housing Strategy Outline

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Section 1 – Reasons for a Private Sector Housing Strategy

The Council wants to raise the standard of private rented housing in the borough. Private sector housing – housing for home ownership and private renting – represents two large segments of the housing stock in Tower Hamlets. Whilst much new-build private housing in the borough is both expensive and well managed, some private sector homes are in poor condition and/or poorly managed. The private rented sector provides a significant amount of accommodation used by the council to meet housing need, enabling local people to stay in the borough. It is therefore important for the council to strike a balance between supporting landlords who are doing a good job and tackling those who are not.

A significant number of former council homes bought under the right to buy are now being let by private landlords. In some instances this has led to serious overcrowding and anti-social behaviour such as noise nuisance, fly-tipping, and drug-related criminal behaviour on estates owned by the council and its housing associations partners.

A minority of private landlords and agents deliberately profit from leaving their tenants to live in rundown, unsafe, or overcrowded properties, or intimidate and threaten tenants. The Council is committed to tackling these rogue and criminal landlords including by taking enforcement action. The council is also committed to working to professionalise the sector, supporting “amateur” and small landlords to provide well-managed homes to their tenants.

The private rented sector has become unaffordable for many Tower Hamlets residents. Median rents have increased by around a quarter in the last five years. As of 2013, very nearly half of all households in Tower Hamlets have an annual income less than £30,000. From autumn 2016 a workless family with children will receive benefits of no more than £384.62 per week to cover rent and living expenses – less than the median rent of a two bedroom flat in the borough.

The purpose of this document is to set out in more detail what options are being considered to raise the standard and affordability of private housing in the borough.

Section 2 - Context

- The 2011 census revealed there were 67,209 private sector homes in Tower Hamlets; 41,670 (62%) of these were in the private rented sector.
- Private rented is now the largest tenure in the borough with 39% of the housing stock, far higher than the London average of 25%.
- Lower quartile rents in the borough are £365 per week for a two bedroom and £462 for a three bedroom flat. The weekly Local Housing Allowance rate for a family needing two bedrooms is £302.33, and for three bedrooms it is £354.46.
- The median rent for a room in a Tower Hamlets shared flat or House in Multiple Occupation is £147 per week. Single people under 35 have a weekly Local Housing Allowance of £102.99.
- Median rents have increased by around a quarter in the last five years, to £1430 pcm (£330 pw) for one bedroom and £1750 pcm (£403.85 pw) for two bedroom flats.
- As of 2013, nearly half of all households in Tower Hamlets have an annual income less than £30,000.
- From autumn 2016, government reforms mean that workless families with children will receive benefits of no more than £384.62 per week to cover rent and living expenses.
- In spite of market conditions, the Council's Housing Options and Assessment service were able to incentivise private landlords to let to 30 low-income households facing homelessness in 2015-16.
- 19,783 households are waiting for affordable housing on the housing register – all are either homeless or in unsuitable housing.
- 19,040 Tower Hamlets residents (7.5%) have a second address outside the borough.
- 4,595 properties in Tower Hamlets have been empty for more than a year. Of these 2,963 are residential properties; 1,632 are commercial.
- Around 16% of private properties are over-crowded; 39% are under-occupied.
- Approximately half the leasehold stock sold under right to buy is now privately rented.
- Approximately 37% of the private stock was built after 1990.
- 19% of the borough's stock failed the decent homes standard in 2011 compared with 35.8% nationally
- Approximately 350 Houses in Multiple Occupation (HMOs) are licensable under current statute.
- 30% of all category one hazards are in HMOs.

Section 3 - The Council's Role

The Council's functions in relation to private sector housing are carried out by a number of different sections who cover enforcement, grant processing, procurement of temporary accommodation and housing advice.

The Council will work corporately to develop a coherent private sector housing strategy that captures all the work that takes place across the Council in relation to private housing across all sectors:

Tenure	Intervention	Section
Private ownership and unoccupied	Empty Homes	3.7
Private owner-occupied including on leasehold	Housing Conditions: Investigation and Enforcement	3.2
	Housing Conditions: Home Improvement Grants	3.6
	The Right To Manage	3.8
Privately owned and let: Private rented sector	Housing Conditions: Landlord Licensing Schemes	3.1
	Housing Conditions: Investigation and Enforcement	3.2
	Housing conditions and affordability: engagement and support for landlords	3.4
	Letting and Managing Agents: Enforcement	3.3
	Promoting the rights of private tenants	3.5
	Housing Conditions: Home Improvement Grants	3.6
	The Right To Manage	3.8
	Institutional Private Sector Landlords	3.9

Section 4 – Issues to be addressed

4.1 Landlord Licensing Schemes

The Council wants to use landlord licensing to tackle anti-social behaviour associated with private renting, deal with poor housing standards and assist in improving the overall management of private rented accommodation.

Alongside investing and enforcing health and safety standards in private sector housing (see below, 4.2), the Council's **Environmental Health and Trading Standards service** manages landlord licensing.

4.1.1 Selective Licensing

The Housing Act 2004 as amended by a 2015 Statutory Instrument gives Councils the power – subject to appropriate local consultation - to introduce a selective requirement for landlord licensing in areas with a high proportion of properties in the private rented sector, provided that the area covers no more than 20% of housing stock in a housing authority area.

Following successful consultation, the Council is introducing selective licensing from 1st October 2016 for all private landlords in the following wards:

- Spitalfields and Banglatown
- Weavers
- Whitechapel

The selective licensing scheme will require all private landlords in these wards to apply for a license. The application will be assessed by an environmental health officer, and the landlord's property may be visited and assessed. The licence holder and property manager will need to meet the 'fit and proper' person requirement. If a licence is issued its conditions must be followed. These relate to gas, fire and electrical safety, and proper management.

The current selective licensing scheme ends on 1st October 2021.

4.1.2 Mandatory Licensing

The Housing Act 2004 requires all landlords of larger Houses in Multiple Occupation (HMOs) to be licensed by the Local Authority. Mandatory licensing applies to HMOs that comprise three or more storeys with five or more occupants forming two or more households.

Mandatory conditions apply to these licences. These relate to gas, fire and electrical safety, and proper management.

250 HMOs in Tower Hamlets have been licensed under mandatory requirements. Between 50 and 100 HMOs are required to have a licence but do not.

The Department of Communities and Local Governments has consulted stakeholders and is now considering whether to extend the scope of mandatory licensing, either to HMOs with two storeys or to all HMOs containing five or more people. In November 2015 the CLG stated that they plan to introduce these changes during 2016.

4.1.3 Additional Licensing

Many HMOs in the borough do not fall under the current provisions of the mandatory licensing scheme. These include a significant proportion of former Council stock sold under Right to Buy and now let by the room to multiple families and to young people. With a lack of affordable homes, the impact of welfare reform, and increasing private sector rents, it is likely that many households will adopt this tenure in order to remain in Tower Hamlets.

The Housing Act 2004 allows Local Authorities to impose additional licensing on HMOs beyond the mandatory regime where the Local Authority believes that a significant proportion of HMOs are poorly managed and giving rise to problems for residents or the general public.

The use of additional licensing must be consistent with the Local Authority's housing strategy and should be co-ordinated with the authority's approach on homelessness, empty properties and antisocial behaviour.

The Act requires that any such scheme is approved by the Secretary of State: however, a general approval was issued in 2010, provided there is a minimum 10-week consultation period.

4.1.4 Sanctions and Powers

Licensing will improve the Council's ability to engage with private landlords, and to drive up standards in the sector without the need to take enforcement action.

However, where a landlord obliged to have a licence under any of these schemes either does not have a licence or does not comply with its requirements, the Council has powers to impose sanctions:

- A failure to licence a licensable property is an offence, and can result in a fine of up to £20,000
- A breach of licensing conditions is also an offence, and can result in a fine of up to £5,000
- Where a magistrate imposes sanctions, the fine can be unlimited
- Rent Repayment Orders require unlicensed landlords to repay up to 12 months' rent – in the case of rent paid through universal credit or housing benefit, this would be returned to the council. Detail on this is given below, at 4.2.2.

Unlicensed landlords who are required to have a licence lose the right to serve notice on tenants requiring possession under section 21 of the Housing Act 1988 until the property is licensed.

There is also potential for additional action against rogue landlords who avoid **council tax**, for example by fraudulently transferring liability to HMO tenants.

The Environmental Health and Trading Standards service is currently unable to access the council tax and housing benefit data it requires to identify HMOs and unlicensed landlords.

4.1.5 LANDLORD LICENSING SCHEMES: ACTIONS

- Keep the selective licensing scheme under comprehensive review and provide a full evaluation ahead of 2021.
- Develop an incentive package to engage licensed landlords and help them manage their properties more effectively. This might include e-bulletins, information and training sessions, energy efficiency schemes or a local landlords' forum and customer panel.
- Apply for an extension to the selective licensing scheme from October 2021 in either its initial or amended form.
- After the CLG reach a decision on whether to extend the scope of mandatory HMO licensing, the Council will consider introducing an additional licensing scheme for Houses in Multiple Occupation either across the borough or in specified areas; and to apply this either to all HMOs or to certain types of HMO.
- Appraise the options to provide additional resources on a cost-neutral basis in order to enforce Rent Repayment Orders, Banning Orders, Council Tax compliance, and licensing.
- Ensure that Council Tax and Housing Benefit data is readily available to the Environmental Health and Trading Standards service in order to facilitate the identification of landlords and HMOs.
- Carry out a stock condition survey of the private rented sector in order to better inform Council decisions and actions on improving the sector.
- Obtain data from East End Homes, Tower Hamlets Homes and Poplar Harca on leasehold properties; and on which of these are rented privately.
- Require landlords who breach licensing conditions to attend The London Landlord Accreditation Scheme.
- Develop regional and sub-regional partnerships on licensing, including in relation to enforcement.

4.2 Housing Conditions: Investigation and Enforcement

4.2.1 Disrepair and poor housing conditions

The Council has a duty to keep the housing conditions in its area under review in order to identify and remedy conditions that are a health hazard or a statutory nuisance.

This duty is discharged by the Council's **Environmental Health and Trading Standards service** through inspection, enforcement, regulation, advice, and education. These service works across areas including pest control, the enforcement of legislation dealing with

accumulations of rubbish and other statutory nuisances, noise nuisance enforcement and control, as well as housing safety and standards enforcement.

The Housing Act 2004 introduced the **Housing Health and Safety Rating System** (HHSRS), a risk assessment and methodology for Environmental Health Officers inspecting and assessing housing conditions. The principle of HHSRS is that any residential premises should provide a safe and healthy environment for any potential occupier or visitor.

Where Category 1 hazards exist the council is obliged to take action to ensure elimination of that hazard.

There are several enforcement options available where hazards are identified. In the first instance, in most cases the appropriate response is to give advice and inform. The Enforcement Officer takes formal action against landlords who deliberately operate outside the law. The Council charges a fee of £474 for each notice served.

The Housing and Planning Act 2016 has introduced new powers to apply for a **Rent Repayment Order** where a landlord has failed to comply with improvement notices or prohibition orders issued under the Housing Act 2004.

The **Deregulation Act 2015** aims to end the phenomenon of landlords carrying out “revenge evictions” where tenants complain about poor conditions – but only if the Council serves notice in relation to a category 1 or 2 hazard. This may increase the number of requests made to the Council to inspect premises using the HHSRS, further increasing demands on very limited resources.

The Environmental Protection Act 1990 imposes a duty on every local authority to inspect its area for statutory nuisances, to investigate complaints of statutory nuisance, and to take action where statutory nuisance exists or is likely to occur. Statutory nuisance is defined as occurring where “any premises in such a state as to be prejudicial to health or a nuisance”.

Where the Council identifies statutory nuisance, the first formal step is an abatement notice giving a clear timescale within which the nuisance must be remedied. The Council can prosecute for contravention or non-compliance with the notice, or can carry out 'works in default' with costs recoverable from the person served with the abatement notice.

The Defective Premises Act 1972 imposes a duty of care to see that people are reasonably safe from injury or damage to their property resulting from defects.

The Prevention of Damage by Pests Act 1949 gives the Council a duty to try and keep the area free from rats and mice. The Council can serve notice on owners and occupiers specifying treatment and/or works. Under the Act, the Council has the power to enter premises to inspect or enforce notices, including the carrying out of treatment or works.

4.2.2 Rogue landlords and agents

A minority of landlords and agents deliberately profit from leaving tenants to live in rundown, unsafe, or overcrowded properties, or intimidate and threaten tenants. The Council is committed to tackling these rogue and criminal landlords.

The Proceeds of Crime Act 2002 gives powers to seek confiscation orders against convicted individuals requiring payment to the state based upon the benefit obtained from their crimes. Successful actions resulting in very significant financial penalties have been

taken by other Councils for poor conditions, planning breaches, and failure to comply with improvement notices.

Rogue landlords, tax and mortgages: The conditions of many mortgages do not grant mortgagees the permission they need to let their property. Rogue landlords may be letting in breach of their mortgage conditions – which could lead to repossession. Rogue landlords may also withhold information about rental income from HMRC.

Protection from Eviction Act 1977: Local housing authorities can prosecute criminal offences of harassment and illegal eviction the Act. **The Local Government Act 1972** also empowers authorities to prosecute where landlords or agents have used violence to enter premises or committed harassment. Conviction under the Act can lead to an unlimited fine and up to two years in prison. However, Prosecutions are rare as they are complex and may not be in the Public Interest.

Criminal Law Act 1977: It is an offence for any person, including a landlord or agent, to use violence or the threat of violence to enter premises. A landlord or agent may be a trespasser on their own property where they have not followed correct legal procedures before entering; on this basis, a tenant who has been unlawfully evicted is a “displaced residential occupier” and is authorised under the Act to force entry back into the property.

Housing Advice help re-instate clients when they have been unlawfully evicted by applying to Court for an injunction and/or giving financial assistance to the client to pursue their right of re-entry as a lawful occupier.

Protection from Harassment Act 1997: the Act generally prohibits a person from “pursuing a course of conduct which amounts to harassment of another; and which s/he knows or ought to know amounts to harassment”. The Act creates an arrestable offence of harassment, and it is open to tenants to pursue compensation claims.

Restoration of Utilities: If the landlord is responsible for the supply of gas, electricity or water and causes it to be cut off the local authority can arrange reconnection with the suppliers with costs recoverable from the landlords.

Injunctions: An injunction is an order of a civil court directing somebody to do, or not to do, something. The court must be satisfied that the “balance of convenience” is in favour of granting an injunction, and breach of an injunction is an arrestable offence. The Housing Advice service assists in the application for injunctions.

Compensation: The Council’s Housing Advice service refers clients to community partners to pursue claims for compensation against criminal and rogue landlords.

The Housing and Planning Act 2016 introduces a raft of new powers to take action against rogue landlords and agents:

Tenants or local authorities can apply for a **Rent Repayment Order (RRO)** where a landlord has committed offences such as unlawful eviction, harassment, failure to comply with improvement notice, or failure to license where it is required. If successful the tenant (or the authority if the tenant was receiving housing benefit or universal credit) may be repaid up to 12 months’ rent. The Secretary of State will make regulations as to how the money recovered will be spent. The Act puts local authorities under a *duty* to consider applying for rent repayment orders where a person has been convicted of an offence. The Act also gives local authorities the power to help tenants apply for rent repayment orders.

Though there are clear resource implications in enforcing RROs, these are likely to be offset by potential revenue gains from successful enforcement. Alongside resources, the Council needs to delegate clear responsibility for these applications.

The Act creates a new '**banning order**' concept enabling a First-tier Tribunal to ban a person for a minimum period of 12 months from letting or managing accommodation. The banning order can be requested by a Local Authority against a landlord or agent who has committed a banning order offence. The scope of what constitutes such an offence will be defined in regulations. The local housing authority can impose a financial penalty of up to £30,000 for breach of a banning order. The Secretary of State may by regulations make provision about how local housing authorities are to deal with financial penalties recovered.

Database of rogue landlords and lettings agents: The Act sets out that the Government will operate a database of 'rogue' landlords and letting agents. Councils will be responsible for updating the database when banning order offences have been committed and when banning orders are issued, and can use it to help exercise their functions.

4.2.3 INVESTIGATION AND ENFORCEMENT: ACTIONS

- Appraise the options to provide the resources aiming at a cost-neutral budget - to make applications for Rent Repayment Orders, Banning Orders, Proceeds of Crime confiscation orders, and Council Tax compliance.
- Work closely with HMRC and mortgage providers when taking action against rogue landlords.
- Develop closer partnership working with the Police to tackle harassment and unlawful eviction.
- Conclude a procedure with legal services for bringing more prosecutions against rogue and criminal landlords.
- Coordinate prosecutions and other enforcement work undertaken by and on behalf of the Housing Options and Advice service and The Environmental Health and Trading Standards service.
- Publicise actions against rogue and criminal landlords in local media, on the Council's website and in partnership with regional and sub-regional partners.

4.3 Letting and Managing Agents: Enforcement

The Environmental Health and Trading Standards service carries out work to regulate letting and managing agents.

4.3.1 Redress Schemes and Complaints against managing agents

Since October 2014 all letting or property management agencies must belong to a consumer redress scheme. Agencies must display and publicise the name of the scheme they belong to. Information about the redress scheme should also be provided to new tenants. The Council is under a duty to enforce these requirements on the agencies in its area and can

impose a fine of up to £5,000 for non-compliance. Sums received by an enforcement authority may be used by the authority for any of its functions.

4.3.2 Agency Fees

The **Consumer Rights Act 2015** requires both letting agents and managing agents to display a list of relevant fees in a prominent position in their office and on their website if they have one. Local authority trading standards officers in the area where the agent's properties are located must enforce the Act. The Council can at its own discretion impose financial penalties of up to £5,000 for non-compliance.

4.3.3 LETTING AND MANAGING AGENTS: ACTIONS

- Advertise to the public and to agents the requirements for agencies to publicise fees and belong to a redress scheme. Publicity could include the Council website, pieces and adverts in Our East End, posters in public spaces, Ideas Stores, and Council offices, and engagement of community partners.
- Conduct a programme of publicised “spot checks” on agents.
- Set up and publicise clear and simple processes for the public to report non-compliant agents. These could include a web portal, email, SMS, and hotline.
- Appraise options for developing a Social Lettings Agency to drive up standards in the borough.
- Consider providing free or low-cost legal advice to private landlords wanting to end onerous contracts with rogue agents in order to incentivise either letting to Housing Options clients or through a Council Social Lettings Agency.

4.4 Housing conditions and affordability: engagement and support for landlords

As a means of improving the quality of private rented housing across the borough, the Council wishes to improve the quality and professionalism of private landlords.

The Council also wishes to increase the supply of affordable privately rented accommodation for the borough’s low and middle income residents.

4.4.1 Landlord Accreditation

The Council is committed to supporting the **London Landlord Accreditation Scheme (LLAS)**. LLAS awards accreditation to reputable landlords who undergo training and comply with a code of conduct. It was set up in 2004 as a partnership of landlord organisations, educational organisations and 33 London boroughs. Being accredited means that landlords meet the London Rental Standard.

Accreditation is a condition of access to **Empty Property Grants** (see below, 4.7.4).

4.4.2 Private landlords and homelessness prevention

The Housing Options and Assessment service works with private landlords who agree to let to their homeless prevention clients at Local Housing Allowance rates in return for a package of benefits. This allows the Council to facilitate access to the private rented sector for residents who are reliant on benefits or low incomes.

In spite of market conditions, the Housing Options and Assessment service were able to incentivise private landlords to let to 30 low-income households facing homelessness in 2015-16.

In return for - and as a condition of – partnership, the Housing Options and Assessment service pay for landlords to gain LLAS accreditation.

The Council has a financial incentive scheme operating through Tower Hamlets Homefinder to reward landlords letting to their clients for at least two years.

4.4.3 ENGAGEMENT AND SUPPORT FOR LANDLORDS: ACTIONS

- Develop an enhanced offer to landlords and property owners in order that more will let to low-income residents nominated by the Council. In particular:
 - Appraise options for developing a Social Lettings Agency, including focussing it on letting and managing accommodation provided by the private sector to residents presenting as homeless to Housing Options.
 - Reinstate the landlords' forum.
 - Provide landlords with e-bulletins, information and training sessions, energy efficiency schemes and customer panel.
 - Incentivise landlords to join the The London Landlord Accreditation Scheme by developing a wider accreditation condition for access to other council services, benefits and grants for landlords.
 - Provide a priority Housing Benefit service to accredited landlords.
 - Require landlords who breach licensing conditions to attend The London Landlord Accreditation Scheme.

4.5 Promoting the rights of private tenants

In a fast-changing regulatory and legislative context, the Council should take steps to improve private tenants' understanding of their rights and empower tenants to improve conditions in their own homes.

4.5.1 Housing Options and Assessment Service

The private housing advice service, accredited by the Legal Services Commission, offers a free, confidential and independent service to people who live in private sector accommodation in Tower Hamlets. The Housing Advice team deal with issues including rent arrears, disrepair, deposits, and threats of illegal eviction. In addition, the team's The Money Advisers can help to look at the best way to manage debt or direct customers to a partner organisation to assist.

4.5.2 Key legislative change affecting private tenants

The 'Right to Rent': The Immigration Act 2014 introduced the concept of a 'right to rent' and therefore the concept that certain people have no right to rent a home.

Landlords and lettings agents are under a duty to check whether their tenants and prospective tenants have the 'right to rent'.

Currently, only British citizens, EEA nationals, Commonwealth Citizens with right of abode, and people with indefinite leave to remain have an unlimited right to rent.

Certain people have a time-limited right to rent. Where an existing occupier's time-limited right to rent expires, the landlord must report this to the Home Office.

People with no valid leave to enter or remain in the UK – including people whose leave has expired – have no right to rent.

Failure to conduct the often complex checks on immigration status, to report to the Home Office the expiration of an occupier's limited right to rent, or to provide accommodation to a person with no "right to rent" can all lead to a fine of £1,000 per tenant and £80 per lodger, rising respectively to £3,000 and £500 for repeated non-compliance.

There are widespread fears and emerging evidence that some landlords and agents avoid the complexities of checking immigration papers by turning away prospective tenants who they believe may not be British citizens.

The Equality Act 2010 imposes a duty on people when letting or managing premises not to unlawfully discriminate against people on the basis of race, religion or belief. A landlord or agent who refuses to let premises to, or check only individuals they think might not be British or EEA nationals, or not having a right to rent because of their colour, ethnic or national origins will unlawfully discriminate.

The government has published codes of practice to provide statutory guidance to landlords and agents on how to operate non-discriminatory lawful checks.

Recent changes have extended tenants' rights in the following areas:

Retaliatory evictions: Where a tenancy has been granted after 1 October 2015, the Deregulation Act 2015 states that a landlord cannot serve notice under section 21 – the notice allowing landlords to carry out simple "no fault" evictions – if that notice is served following a written complaint from the tenant about the condition of the property *and/or* the local authority serves either an improvement notice in relation to a hazard.

Deposit protection: Deposit protection schemes effectively ensure that landlords cannot unfairly retain tenants' deposits at the end of the tenancy. A landlord must protect their tenant's deposit. Landlords who do not do this are liable to a claim from the tenant for full and immediate return of the deposit plus a penalty, payable to the tenant, of between one and three times the deposit's value. In addition, those landlords cannot use the section 21 notice possession procedure to evict the tenant.

4.5.3 PROMOTING THE RIGHTS OF PRIVATE TENANTS: ACTIONS

- Work with community partners and programme a regular publicity campaign to promote awareness of private tenants' rights - including on the Council website, in Our East End, and through posters in public spaces, Ideas Stores, and Council offices.

- Publish and publicise expectations of how landlords should carry out the 'Right to Rent' checks consistently and fairly to avoid discrimination.
- Engage private tenants including through forums.
- Provide tenancy training to homeless households moving into the private rented sector.

4.6 Housing Conditions: Private Sector Housing Renewal Policy

The Council has a duty under the Housing Act 2004 to review housing conditions in their district. Where housing conditions are found to require improvement, assistance can be provided under the terms of Article 3 of the Regulatory Reform (Housing Assistance) Order 2002; however a local authority is also required to have adopted a Private Sector Renewal Policy. The Private Sector Housing Renewal Policy 2016 – 2018 forms a subset of this document.

The Council's Private Sector Housing Renewal Policy 2016 – 2018 is attached to this document and sets out the Council's position on direct grant funding to owner occupiers and private sector landlords and tenants.

4.6.1 Disabled Facilities Grants and the Better Care Fund

See 5.1, Private Sector Housing Renewal Policy 2016 – 2018.
Disabled Facilities Grant is now contained within the Better Care Fund (BCF).

4.6.2 Home Repair Grants - owner-occupiers

See 4.2 Home Repair Grants, Private Sector Housing Renewal Policy 2016 – 2018.

4.6.3 Tower Hamlets Home Improvement Agency

See 5.4, Other Assistance, Private Sector Housing Renewal Policy 2016 – 2018.

4.6.6 PRIVATE SECTOR HOUSING RENEWAL POLICY: ACTIONS

- Refresh the Council's private sector housing renewal policy to set out the approach, including to partnership working and the Better Care Fund, over the 2016-21 years.

4.7 Empty Homes

4.7.1 Identifying Empty Homes

As of May 2016, **4,595** properties in Tower Hamlets have been empty for more than a year. Of these **2,963** are residential properties; **1,632** are commercial.

69.8% of the empty residential properties have been empty for more than two years. 39% have been empty for more than five years.

The Council identifies empty homes through council tax and Land Registry records and by facilitating reports from the public, property owners and developers.

A complex range of reasons lead to buildings being left empty. Many are in a neglected state and have a damaging impact on their local area. At the other end of the spectrum, Council Tax records show that nearly half are second homes (1,264 of the 2,963 empty homes).

4.7.2 'Buy to Leave'

There are increasing public and political concerns about "Buy to Leave" properties: properties bought by international investors in order to maximise their return on capital growth and then left empty. It is typically associated with buying off-plan in large developments, with significant representation of overseas investors.

Anecdotal reports suggest that a high proportion of these properties are kept empty, though currently in Tower Hamlets quantitative evidence is lacking.

The GLA's November 2015 economic analysis of London's housing market suggests that international investment is responsible for only a small share of transactions and is likely to have had only modest effects on house prices; on the other hand, it is a phenomenon concentrated in small areas, and international buyers as a proportion of sales in prime central London and Canary Wharf have increased from 23 per cent in 2005 to 40 per cent in 2014.

4.7.3 Short term holiday lettings

London had 23,000 Airbnb listings in 2015: after Paris and New York, the highest in the world. Cities across including New York, Amsterdam, Paris, and Berlin - have taken steps to regulate the market on the basis that it diminishes housing stock, disrupts social cohesion, and strains relationships between landlords and tenants. The Council has no data on the extent of the market in Tower Hamlets, or on whether it has a negative impact on local housing supply or communities.

Under the Greater London Council (General Powers) Act 1973, short-term rentals are subject to a planning restriction making the use of residential premises as temporary sleeping accommodation a "material change of use" for which planning permission is required. The Deregulation Act 2015 introduced an exception to this restriction allowing residential premises to be used for temporary sleeping accommodation for up to 90 nights a year. Owners of properties used for more than 90 days can be fined up to £20,000.

4.7.4 Engagement with owners of empty homes

The Private Housing Investment Team records empty properties on the Empty Homes database and manages casework through the database.

The Private Housing Investment Team contacts owners of empty property to broker the reuse or conversion of empty properties. In many cases this initial dialogue is enough to confirm the owner's plans for the property, and to encourage those plans to be concluded in a timely manner. The owner is offered information and assistance including:

- **Reduced or zero rate VAT.**
- **Empty Property Grants:** See 4.3 Empty Property Grants, Private Sector Housing Renewal Policy 2016 – 2018.

4.7.5 Enforcement action against owners of empty homes

Where the Council remains unsatisfied that the property will be returned to use as efficiently as possible, consideration is given to enforcement options.

Where there is a public nuisance, or a recurring or potential statutory nuisance, the Council has a duty to issue an Abatement Notice under s80 of **the Environmental Protection Act 1990**. Responsibility for this action rests with the Environmental Health Team. An Abatement Notice requires the owner to carry out specified works and take any steps necessary to abate the nuisance within specified time limits. The Council can prosecute where an abatement notice has not been complied with, or can carry out works in default and recover costs from the owner.

Where an empty building is dangerous or dilapidated, verminous or unsecured, **the Building Act 1984** gives the Council powers to require the owner to make the property safe or to address the external appearance of the building, or to take emergency action to make the building safe.

Section 215 of the Town & Country Planning Act 1990 provides a local planning authority with the power to take steps requiring land to be cleaned up when it is adversely affecting the amenity of an area. The Council can serve a notice on the owner requiring that the situation be remedied. The Council can commence prosecution proceedings for non-compliance with any Section 215 notice, resulting in a fine not exceeding £1,000. Additionally, or in the alternative, the Council can carry out works in default and seek recovery of costs from the landowner.

The Council has the power to enforce a **Compulsory Purchase Order (CPO)** on a vacant residential property under the Housing Act 1985. The powers do not cover commercial properties. However, this is a power that can only be used as a last resort. The Council must demonstrate that it has taken all steps to encourage the owner to bring the property back into acceptable use, and that the reasons for making a CPO justify interfering with the human rights of anyone with an interest in the property.

A full valuation, a financial appraisal, and risk assessment are carried out wherever CPO is considered. Cabinet approval is needed to initiate formal compulsory purchase of a property. There is currently no budget for Compulsory Purchase Orders.

Chapter 2 of the Housing Act 2004 enables the Council to take possession of an empty property and then place tenants in it through an **Empty Dwelling Management Order (EDMO)**.

The threat of an EDMO is intended to put pressure on the owner to enter into constructive dialogue. The first stage in the process is application to a Residential Property Tribunal for an interim order. The tribunal must be satisfied that the property has been empty for at least two years, as well as being vandalised or actively used for "antisocial" purposes, and that there is local support for the use of an EDMO. An EDMO cannot be granted if the owner proves the properties are in the process of being sold.

Once an interim EDMO has been granted, it lasts for up to twelve months, during which the authority works with the owner to try and agree a way to put the property back into use. If no agreement is reached during this time, the authority may make a final EDMO, which lasts for up to seven years. A final EDMO differs from an interim EDMO in that the authority is not required to obtain the owner's consent before finding a tenant for the property.

When a tenant has been found under the EDMO, the rent is paid to the local authority, which is able to recover any costs they may have incurred by taking possession of the property and making it habitable. Any money over and above these costs is to be paid to the owner of the property.

A full valuation, a financial appraisal, and risk assessment are carried out wherever an EDMO is considered, and Cabinet approval is needed to apply to a Residential Property Tribunal for an EDMO. There is currently no budget for EDMOs.

4.7.6 The New Homes Bonus

The New Homes Bonus was introduced in order to provide a clear incentive to local authorities to encourage housing growth in their areas. The Bonus rewards local authorities for each additional new build and conversion. Long-term empty properties brought back into use are also. Each year's grant is paid for 6 years. The Bonus is not ring-fenced.

4.7.7 EMPTY HOMES: ACTIONS

- Put in place clear casework procedures, targets and timescales aimed at reducing the number of empty properties in Tower Hamlets.
- Appraise options for developing a Social Lettings Agency, including focussing it on bringing empty homes back into use by letting and managing empty properties to Housing Options clients at no cost to the owner.
- Develop an evidence base on "Buy to Leave" properties including through the use of Council Tax and electoral roll data. Against this, assess the viability and desirability of responses including Planning Obligations under Section 106 of the Town and Country Planning Act 1990, and revising Council Tax rates for empty homes.
- Explore the viability of working with a social enterprise in clearly defined circumstances to facilitate the letting of empty private sector properties on a short-term basis to property guardians.
- Gather data and evaluate the impact of short-term rentals.
- Publicise and enforce existing legislation on Airbnb lettings made for more than 90 nights a year.
- Develop a budget to fund Compulsory Purchase Orders and Empty Dwelling Management Orders from 2017/18, potentially working with Registered Providers to fund this work, and consider incorporating revenues from the New Homes Bonus.

4.8.1 The Right To Manage

4.8.1 Private and Housing Association Leaseholders' Right to Manage

The Commonhold and Leasehold Reform Act 2002 provides a right for leaseholders to force the transfer of the landlord's management functions to a special company set up by them – the Right to Manage company. The right was introduced not just as a means of wresting control from bad landlords, but also to empower leaseholders to take responsibility for the management of their block.

The right to manage does not apply where the landlord of any qualifying tenant is a local housing authority: council leaseholders' rights are set out below, 3.8.2.

Leaseholders of a housing association have the right to manage as long as all the other qualifying conditions can be met. This also applies where shared ownership leaseholders have acquired a 100% share from the housing association.

Private leaseholders' right to manage is only applicable if tenants with a lease of 21 years or more comprise at least two-thirds of the total number of flats in the premises. The right to manage is not applicable if different people own the freehold to different parts of the building, there is a resident landlord.

The landlord's consent is not required, nor is any order of court. However, either the landlord or another leaseholder may object by serving a counter-notice: but the right to manage application will be defeated only if a qualifying condition is not met.

4.8.2 Council Leaseholders' Right to Manage

Local authority leaseholders have a collective right to take on the management of the council housing where they live since 1994. Right to Manage Regulations provided for by s27 Housing Act 1985 were introduced in 1994 and revised in 2008 and 2012.

This Right to Manage is exercised by forming a Tenant Management Organisation (TMO) in order to take over housing management services such as repairs, caretaking, and rent collection. Four TMOs manage 880 homes in the borough on behalf of the Council. The Council has a duty to facilitate the exercise of the Right to Manage by their tenants.

4.8.3 THE RIGHT TO MANAGE: ACTIONS

- Provide more targeted advice to leaseholders on the right to manage.

4.9 Institutional Private Sector Landlords

The Council supports the emergence of institutional investment and management into the private rental sector, through converted stock and in particular through the development of purpose-built private-rental stock.

The Council will actively explore new partnerships and delivery models to develop high quality market rent housing, especially where it gives opportunities for renting at below median market rent levels.

4.9.1 INSTITUTIONAL PRIVATE SECTOR LANDLORDS: ACTIONS

- Actively explore new partnerships and delivery models to develop new, high quality market rent housing, especially where it gives opportunities for renting at below median market rent levels.
- Consider instituting a separate use category for "Build to Rent" developments
- Encourage Build to Rent schemes that are accessible and attractive to residents and the wider community.

4.10 Improving Joint Working

The council will improve its joint working with internal and external stakeholders to deliver this private sector housing strategy.

4.10.1 IMPROVING JOINT WORKING: ACTIONS

- Develop a biannual PRS forum, internal joint-working, and information-sharing protocols between Trading Standards, Environmental Health, Home Improvement Team, Housing and Council Tax Benefits (including home visits team), Corporate Anti-Fraud Team, Housing Options and Advice, Planning Compliance, Building Control and Tower Hamlets Homes leasehold services, in particular in relation to:
 - - HMO enforcement
 - “fit and proper person” tests
 - subletting of social housing
 - ASB in council leaseholder lettings
 - Rogue landlords database
 - Short-term lets
 - Sham lettings
- Develop shared rogue landlord database for Trading Standards, Environmental Health, Housing and Council Tax Benefits (including home visits team), Corporate Anti-Fraud Team, Housing Options and Advice, Planning Compliance, Building Control and Tower Hamlets Homes leasehold services.
- Develop joint-working and information-sharing protocols with registered providers in relation to subletting of social housing, leaseholder lettings, short-term lets, and sham lettings.
- Work with universities to prevent sham lettings and social housing fraud.
- Establish annual PRS forum bringing together key internal services and external partners.

August 2016

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Towards a Housing Strategy

First Stage Consultation Report

Executive Summary

The *Towards a Housing Strategy* consultation was launched by Mayor Biggs in an article in *East End Life* on 16th May 2016, with a housing survey available online. As of 1st August 2016, 409 surveys were completed – approximately 65% of these were completed in face to face consultations by officers in the Borough's markets, with the remainder completed on the Council's website.

The data below has been extracted from the survey data recorded. The data received from the survey cannot claim to be statistically accurate in representing the views of the majority of those living in Tower Hamlets; however it does provide a good insight into the key issues concerning people in the Borough which will be valuable for informing the development of the housing strategy.

It should be noted that prior to this consultation being held, the work of the Mayor's Housing Affordability Commission, Somali Task Force and consultation on the Local Plan in late 2015 and early 2016 also provided valuable feedback from across the Borough's communities on a wide range of housing issues.

Methodology

The questions in the survey were primarily developed around the findings and recommendations from the Mayor's Housing Affordability Commission which ran from December 2015 to February 2016 and through wider policy discussions with the Lead Members for Housing.

Before the online survey went live, it was tested by council colleagues in order to ensure it worked and surveys could be submitted without any technical problems arising. The paper survey questions were tested on colleagues who did not work day-to-day in housing, in order to ensure the questions were clear so that residents in Tower Hamlets could understand what they were being asked to comment on. As a result of this, the language used in some of the questions was simplified in order to make it 'less techy'. Survey results were examined in order to ensure they were representative of the demographics of Tower Hamlets.

Events and Consultations

As part of the consultation, Council officers held over a dozen events across the Borough. Officers carried out face to face surveys in markets, idea stores, residents meetings, as well as briefing colleagues, management teams and partners in internal and external meetings. Specific engagement included holding an All Member briefing event, attending the Children and Partnership Board, the Parent and Carer Council, the Interfaith Forum, Housing Options partners, holding three internal staff events, hosting a stall in Mulberry Place, and attending the Tenants and Residents Federation open meeting.

Respondents' profiles

Please note that not all respondents completed the monitoring survey. Therefore, the stats headlines do not add up to 100.

- Gender of those completing the survey: 49% female, 36% male.
- Landlord: 24% LBTH, 25% HA, 16% PRS, 16% owners, 2% homeless.
- Ethnicity: 28% Bengali, 26% British, 4% white, 3% Black, 1.5% Somali.
- Age Group: 16-24 (6%), 25-35 (23%), 36-45 (24%), 46-54 (11%), 55-64 (10%), 65+ (8%)
- 40% of respondents live in the Borough, while 5% work in LBTH. For the remaining 55% the question was not answered.

Top 10 Housing Concerns of Residents in Tower Hamlets

The top 10 housing concerns below were recorded from the comments made to officers by the public during the face to face surveys, and from the online survey which gave the public the opportunity to add specific comments.

1	Overcrowding
2	Waiting List (too long)
3	Expensive / high rents
4	Local people should get housing priority
5	Repairs (Poor quality / Take too long)
6	Lack of parking
7	Lack of affordable housing
8	Lack of key worker housing
9	Low household income
10	Affordable rent is not affordable

Examples of Housing Concerns

The comments below are a cross section of comments received during the face to face surveys and online. They are intended to give Members a feel of the type of comments being made by the public on key housing issues. A full list of comments is available for Members should they wish to look at them.

OVERCROWDING

“Teenagers of the opposite sex sharing the same room. For example a teenage boy 16 sharing with a teen girl of 13.”

“I have four girls that all currently share a room. The council should spend an evening in my home watching how hard it is for my daughters aged 13, 10, 8 and 2 to share one bedroom together with no private space for themselves!”

HOUSING REGISTER

"The waiting list is too long."

"People jump the housing queue."

"I think it is really important for the Tower Hamlets council to strive to house those on the housing waiting list, as it is only fair as some families have waited years. So to try and build more housing which will accommodate for affordable rent will be ideal, so everyone can benefit from it."

HIGH RENTS

"Many of us cannot afford to pay £250 - 300 per week so I would like to see more homes which is less than £200."

"The average working family cannot afford a rent of £250-£300.00 per week."

"The council need to build new homes that we can afford as many of us do not earn more than £15,000 PA and we cannot afford to pay rent of £300 + per week. Priority needs to be given to those that have medical needs and need a ground floor property. There is a shortage of ground floor properties and these are being given to those who do not even need a ground floor. Old estates and buildings can be refurbished to save money than demolishing and building new build homes."

"People on housing benefits should not be in prime area like zone 2!"

"Rent is very high and unaffordable. As someone who earns between 18-20k I struggle to pay the rent every month and have to scrape to get by. I find myself in situations where I am having to lean towards borrowing from the bank in order to make it through the month financially. The flat I live in is small and isn't even worth the money I pay for it."

HOMES FOR LOCAL PEOPLE

"No outer borough placements and homes for local people."

"Properties bought by the wealthy as investments at the expense of residents - it is pushing prices up."

"Only people born and bred in Tower Hamlets should get priority housing."

"Local people don't get housed. People from the EU come here and get housing priority while we have to go private."

REPAIRS

"Standard of homes is not good. Not modern."

"Repairs are a problem - waiting too long and contractors not doing what they say."

"Amount of time it takes THH to carry out repairs - not good enough."

"Quality of housing association repairs and services is poor - they should be required to document and evidence management support."

“Process for repairs is too long - limited options.”

“Make better use of empty properties.”

LACK OF PARKING

“No parking.”

“Public service areas should also be increased including GPs, schools, green spaces etc. - parking should also be considered, it is not enough to say a building is 'car free' - this does not seem to ensure that people cannot gain access to a resident permit, as there seems to be numerous 'work-around' this. The best solution would be to ensure all buildings have parking available at an affordable cost.”

LACK OF AFFORDABLE HOUSING

“Affordable homes allow people to stay in, contribute feel part of their local area. Expensive small private houses and flats create transient, tense cramped areas in this city of ours. That will be the slums of the future.”

LACK OF KEY WORKER HOUSING

“How are local communities being supported with all the new housing such as schools, doctors surgeries and local services? These new apartments create problems with school places and push locals further from their school catchment areas. Why aren't there more key worker builds?”

“How are key workers being supported in the borough? What about key workers who live in overcrowded conditions for example? What incentive is there for them to continue to teach in London? How are those with median incomes able to pay rising rental rates in tower hamlets or afford homes? They are unable to do either.”

“Housing for key worker staff should be a priority.”

LOW HOUSEHOLD INCOME

“Too many homes feels like those on low income pushed out.”

“The majority of Tower Hamlets is full of families on very low income and those living in poverty. the last thing the council could do is encourage more higher earning individuals to come and live in this borough as that will inevitably lead to the social cleansing of the majority of residence that have lived in Tower Hamlets for the entirety of their lives.”

AFFORDABLE RENT IS NOT AFFORDABLE

“Define affordable housing, whom is it affordable too, based on what calculations?”

“These affordable rents are too high for family's to afford. I myself refused a 3 bed flat of £203 a week because we couldn't afford it. Also stop offering family's 9th floors with young babies. It's dangerous and not safe.”

Housing Survey Statistics – Short Survey

The questions below were asked in order to gauge the level of support for the broad proposals of the Housing Strategy document. The survey results reveal that a majority residents support the direction of travel set out in the document.

Survey Question	% of Respondents who think this is 'Very Important'	% of Respondents who think this is ' Important'
Building new council and housing association homes with rents that people can afford to pay.	82.6%	10%
Building new homes on its own estate for median income households (e.g., a single person or two people) who earn between £30,000 and £45,000 per year - before tax.	46.5%	26.7%
The council works with housing associations in LBTH to make them more transparent and responsive, to improve the quality and management of housing association homes and will intervene where possible to improve services.	61.9%	22.7%
Using council land to build new homes as well as modernise council estates.	67%	20.8%
The council to work with private landlords to improve the quality and management of private rented housing and take action against bad landlords.	61.9%	23.7%
The council providing homelessness services to people who are not legally defined as homeless, but who the council think it is important to give advice and support to.	46.7%	31.3%
Continue to give priority to people in most housing need on the housing register.	66%	19.6%

Long Survey Data:

In addition to the data included in the short survey responses above, approximately 140 people went on to complete a longer version of the housing strategy survey on the LBTH website. Support for the proposals was more mixed than in the short survey particularly in relation to developing homes outside the borough and some aspects of the proposed changes to the allocations scheme.

Housing Survey Statistics –Long Survey

Question 1 – The cost of council and housing association affordable rented homes			
	More homes at higher rents	Fewer homes at lower rents	No view
The council may have to make the difficult decision of deciding whether to have more rented homes at higher affordable rents (closer to the government’s affordable rents which are up to 80 per cent of market rents) and in the region of £250 - £300 per week for a two bed flat or have fewer homes at rents closer to current council social rents or (closer to the council’s social rents) and in the region of £110 - £150 per week for a two bed flat.	33%	57%	10%

Question 2 – Should we build new homes in lower value areas			
	Building new homes in lower cost parts of Tower Hamlets	Build new homes at cheaper rents outside Tower Hamlets	No view
The council may have to make the difficult decision of deciding whether to build more rented homes at rents close to current council rents in either lower value areas or perhaps outside of the borough. Which do you think is most important	60%	35%	5%

Question 3 - A new rental product for median income households

	Agree	Disagree	No View
The Mayors Housing Affordability Commission has recommended that the council should consider developing homes at higher rents on its own estates for median income households e.g. a single person or two people who earn between 30000 and 45000 - before tax. These homes would be let on a separate waiting list and be built alongside homes at lower rents for people in greater need. Do you agree with developing new homes on estates with a mix of rents which are affordable to local people on different income levels:	58%	37%	5%

Question 4 - Repairing and improving council stock or building new homes on council estate land

	Repairs and improvements to existing housing stock	Building new affordable homes on council estate	A mix of both improvements and new homes	No View
Due to the government's decision to reduce rents by 1 per cent for the next 4 years, the council will have less money to spend on council housing, which means there are difficult decisions about where to spend the money that is available. In respect of the council's housing managed by Tower Hamlets Homes, which of the three options do you think the council should prioritise?	13%	19%	64%	4%

Question 5 - Improving private rented housing

More tenants than ever before now live in the private rented sector. The council is introducing a private sector licensing scheme to register private landlords in the east of the borough in the autumn, with the aim of improving services and rooting out bad landlords. What kind of changes would you like to see in accommodation provided in the private rented sector?

	Agree	Disagree	No View
Longer tenancies. Currently most private tenancies are usually for between six months and a year and may not be renewed	71%	13%	17%

More action on bad landlords, for example, landlords who do not carry out repairs or who harass tenants	88%	5%	8%
License private landlords of houses in multiple occupation in the borough	71%	13%	16%
Have a standard of service, like the London Rental Standard, promoted by the Mayor of London	76%	8%	16%

Question 6 - Meeting homeless households' needs

Homelessness continues to be a major issue in the borough. The council has a legal duty to meet certain homelessness people's needs – usually the most serious based on the Common Housing Register Allocation Scheme - which may be met using council or housing association accommodation or using private sector housing.

Others may just be entitled to housing advice. While the council delivers many new affordable rented homes a year, we still cannot build enough homes to meet everyone's needs. Private rented housing in the borough is too expensive to house homeless people who are on low incomes. This is likely to mean some homeless people will be placed outside Tower Hamlets on a permanent basis. This means we need to consider radical solutions. The council is also considering other ways to provide temporary accommodation for homeless people. To meet these needs:

	Agree	Disagree	No View
Should the council build and / or buy temporary accommodation in the borough	57%	25%	18%
Should the council build and/or buy temporary accommodation outside the borough	46%	40%	13%
Should the council use suitable private rented housing (and council and housing association temporary accommodation) to end its council's homelessness duty.	50%	34%	16%

Question 7 - Allocating council and housing association homes to households from the Housing Register

The council is also consulting on changes to the Housing Allocation Scheme in as part of the consultation on the draft Housing Strategy. The Scheme sets out the rules that decide whether an applicant can join the Common Housing Register and what priority band they receive. We are looking at a number of changes. These include:

The council currently operates a 10 per cent quota for Band 3 applicants who are not in housing need, given the housing demand from other applicants on the register. Do you think we should consider:

	Agree	Disagree	No View
Remove the quota entirely	34%	41%	26%
Reduce the percentage quota to 5 per cent or less which will increase the lets available to higher priority applicants, including homeless families	39%	42%	19%
Reduce the quota and restrict them to 1 beds only which will increase the lets available to higher priority applicants, including homeless families	33%	47%	20%

	About right	Too long	Too short	No view
On the three year continuous residence rule, do you think the length is	50%	15%	24%	11%

	Agree	Disagree	No View
Should we, retain the residency requirement but create a sub-band in Band 2 for cases in housing need but have not lived in the borough for 3 years continuously.	31%	48%	21%
Should the council only allow room sharing if children of opposite sex are under 10 years of age	51%	34%	15%

The results from the longer survey demonstrated broad support for the proposals in the Towards a Housing Strategy document, however there were mixed responses to the allocations question on Question 7, which have been taken into consideration for the allocations report.

Additional Comments:

Respondents were able to make additional comments on the housing survey, both after each question and at the end of the survey. The word cloud in figure 1 represents some of the most frequent key words used by those commenting on the housing strategy.

Figure 1: Word Cloud generated from additional comments on the survey



<p>Cabinet</p> <p>6 September 2016</p>	 <p>TOWER HAMLETS</p>
<p>Report of: Debbie Jones, Corporate Director, Children's Services</p>	<p>Classification: Unrestricted</p>
<p>Planning for School Places – 2016/17 Review</p>	

Lead Member	Councillor Rachael Saunders, Cabinet Member for Education, Children's Services and the Third Sector
Originating Officer(s)	Pat Watson, Head of Building Development
Wards affected	All
Key Decision?	No
Community Plan Theme	A Fair and Prosperous Community

Executive Summary

The Council has a statutory duty to provide sufficient school places for the local population. In Tower Hamlets the school age population is rising and this is projected to continue. The Council has to plan to meet the need.

This report is the annual review of planning for school places. This sets out the projections for the next 10 years, the additional capacity required to meet the need, and plans in place and in development to meet the need.

Where a new school is to be opened to meet need for places, there are requirements for commissioning the school provider. The report includes a recommendation to proceed with commissioning a provider for the proposed Bromley Hall Primary School.

Recommendations:

The Mayor in Cabinet is recommended to:

1. To note the contents of this report and the progress made in meeting the need for additional places;
2. To note that proposals for specific schemes will be subject to separate consultation and procedures and Cabinet decisions;
3. To agree that the initial consultation on the specification for the new Bromley Hall Primary School should proceed.

1. REASONS FOR THE DECISIONS

- 1.1 The Council has a statutory duty to provide and plan for school places. The report sets out the 2016 projections of need and proposals to meet the need.
- 1.2 Planning for school places has to be kept under review to ensure there are proposals to meet the projected need which can be implemented in time to meet the need. The rising trend of need continues although with variations from year to year.
- 1.3 The Council (also referred to in the report as the local authority or “LA”) has proposals in place to meet the need and these can require long term planning to implement. Decisions are required in time so that the programme of providing places can continue and have certainty to meet the need. Where decisions are not made in time, there may be a need for additional short term measures to ensure children can be offered a school place. These measures, such as bulge classes, can be difficult to implement and are not a sustainable approach to providing places. Such measures can be used for primary places but will not be suitable for secondary schools

2. ALTERNATIVE OPTIONS

- 2.1 The Council has to comply with its duty to provide school places. Some of the need for places is being met by the establishment of free schools which are decided by the Secretary of State. However, the majority of proposals for new places will be initiated by the Council. This report includes options for the programme of meeting need for places.
- 2.2 Where the Council has not made sufficient plans to ensure permanent places are available when needed, short term proposals may be needed which may be less cost-effective by reliance on temporary buildings.

3. DETAILS OF REPORT

- 3.1 The LA has a statutory duty to provide sufficient school places for the local population. There is a rising need for more school places in Tower Hamlets.

Projections of the need for places

- 3.2 Projections of the need for school places are provided by the GLA which uses a standard model for the majority of London LAs. The GLA uses housing development data provided by each borough for the borough level projections. The projections are shown to have a good level of accuracy in the short term. The trends over the 10 year projection period can fluctuate in each annual round of projections. This can reflect the most recent birth data and variations to housing data.
- 3.3 The projections for 2016 show a continuing rise in need for places at both primary and secondary. However, the trend for the growth in primary need

has adjusted in comparison with 2015 and is now less steep in the medium term. In January 2016 the actual school rolls at Reception year were lower than projected, which had also been the case in 2015. The actual births for 2014 were lower than had previously been projected. These actual data adjust the projections for 10 year period taking account of lower birth rate trends but also rising population of women of childbearing age. The projections of secondary need have increased at a steeper rate for the medium term.

- 3.4 The total number of actual births in 2015 was very close to the 2014 total which therefore limits the rise on projected need for school places 5 years later. However, it should be noted that in the longer term the birth rate is projected to rise and the school roll projections also reflect continuing levels of new housing development.
- 3.5 It is also worth noting that the number of children in Reception year as a percentage of the actual births four years previously (the “conversion rate”) has shown some changes in the last 10 years which have an impact. In 2006/07 the conversion rate was 77%, rising to 80% in 2013/14, but since falling to 75% in the last year. The reasons for this are no doubt complex, but the impact of the decrease is now showing in the decrease in the rate of the rise in need for places.
- 3.6 The LA should continue to take a cautious approach to planning for additional school capacity. Whilst the projections of need are now showing a slower rate of increase at primary, it is possible that this could vary again either upwards or downwards in the future. For primary places, the projections beyond 2019/20 relate to projected rather than actual births so are less reliable than the short to medium term projections based on actual birth data.
- 3.7 In the period 2015/16 to 2025/26 the total school roll of 4-16 year olds is projected to rise by 9,000, an increase of 25%. This is approximately 4,000 primary pupils and 5,000 secondary pupils. This is a similar total increase over 10 years as shown in 2015, but the need for secondary places is now forecast to be higher than the need for primary places.

Primary Schools

- 3.8 It is projected that there will be 781 more Reception aged pupils in 2025/26 than in 2015/16. This means in addition to plans for extra capacity already agreed there will be a need for 6FE of more primary capacity in the period but existing capacity (including capacity planned up to 2019) is projected to be sufficient until 2022/23.**

Secondary Schools

- 3.9 It is projected that there will be 917 more 11 year olds in 2025/26 than in 2015/16. This means there will be a need for 28FE of more secondary capacity, with 10FE needed by 2020/21.**

3.10 The 2016 projections with available and planned school capacity are included as Appendix A. The table showing projections of need for Reception year clearly shows that existing and new capacity already planned will not be exceeded until 2022. Therefore at this stage further new proposals will not be brought forward for implementation.

ACTION TAKEN TO PLAN FOR EXTRA SCHOOL PLACES

3.11 Previous annual reports have detailed the range of activities undertaken to provide additional capacity and to continue to investigate options for new capacity. The progress and further actions since the last review are as follows:

EXPANSION PROPOSALS AND EXISTING SITES	
*Olga Primary School expansion from 1FE to 3FE	Phased implementation of expansion - 1FE from September 2016 and additional 1FE from September 2017
*Former Bromley Hall Special School site	Agreed by Cabinet 13 May 2015 to be used for 2FE of primary capacity. Programme for opening in September 2018. See later section of the report for further details about the commissioning of the school provider
*Former Bow Boys' School site	Agreed by Cabinet 13 May 2015 to be used for 3FE of primary capacity. Development proceeding.
STRATEGIC DEVELOPMENTS – site allocations secured in the strategic planning process	
Bromley by Bow district centre	Primary school. Development timetable to be confirmed. LLDC reviewing masterplan.
Fish Island (Mid)	Site allocation for a primary school at Neptune Wharf. Planning application approved by LLDC in March 2014 includes outline permission for a 3FE school. The s. 106 requires LBTH to exercise option to develop within 5 years of start on site summer 2015.
*Fish Island East, Sweetwater (within LLDC area)	Primary school. Originally 3FE school proposed in Legacy masterplan with a new secondary school elsewhere in the area. It is now proposed to open an all-through school, the Bobby Moore Academy, from September 2017. The school will have 1,560 pupils in total with 60 places for Reception and 180 for Year 7. The primary site falls in Tower Hamlets and the

	secondary site in LB Newham. The school has proposed to operate within the LBTH admissions arrangements.
London Dock	Site allocation for a 6FE secondary school. Planning application approved March 2014 includes outline permission for a school. LBTH has 10 year period to exercise the option to develop the school. The design is in development. Programme and cost information to be developed to confirm timetable for Cabinet decision to proceed.
Westferry Printworks site	Site allocation for a 6FE secondary school. Planning application determined by Mayor of London includes site for the school. Section 106 agreement completed which allows LBTH to take a lease and develop the school site. Development timetable to be determined.
Bow Common and Leven Road Gas Works sites	Primary school site allocation at both sites. Development timetable to be confirmed.
Ailsa Street	Primary school site allocation. See above, former Bromley Hall School site

* = capacity shown on Appendix A tables

- 3.12 Where development sites have been secured through the strategic planning process, the development timetable is in the hands of the developers. The school sites will be secured through planning obligations (s. 106 and CIL). The Council will develop and fund the school accommodation and arrange the commissioning of the school operators.
- 3.13 In addition to site allocations, the Council has negotiated capacity for primary school accommodation in major residential developments, subject to planning consents. These have or will be secured through s. 106 agreements. The developer will provide the “shell and core” and the LA will fund and procure the fit out for opening. The development’s s. 106 financial contribution or CIL payment is adjusted to reflect the provision.

Wood Wharf	2FE primary school included in the proposals (s. 106 agreement December 2014). LBTH working with CWG on detailed proposal for planning submission autumn 2016. Cabinet decision to be sought (date tbc) to confirm LBTH proceeding. Anticipated school opening date September 2020.
Site at 3 Millharbour	2FE primary school included in the proposals. Planning consent issued. Land and

	development agreement under negotiation. Anticipated school opening 2023.
50 Marsh Wall, Alpha Square	Planning application determined by Mayor of London; LBTH SDC was minded to refuse. 2FE primary school included in the scheme. Details of how this will operate and anticipated opening date tbc.

The capacity proposed in the above schemes is not included in the Appendix A tables.

- 3.14 The LA continues to investigate further options for school expansions and other site options. Based on the 2016 projections, no new primary expansion schemes will be started for the time being other than those already in hand. The programme to open a 2FE primary school at the Former Bromley Hall School site in September 2018 is proceeding (see below for further details about the commissioning of the provider).
- 3.15 The need for additional secondary places is shown in the projections. The design development for the London Dock site is proceeding and project development will be programmed for the Westferry site. The Livingstone Academy proposal shown below and the Canary Wharf College 3 will provide additional capacity. However, further secondary school sites are likely to be required.
- 3.16 There are implications for school capacity arising from the strategic planning work being undertaken to develop the new Local Plan and from the Isle of Dogs and South Poplar OAPF (opportunity area planning framework). The need for additional school capacity is included in the development work to identify the social infrastructure required to support development. There may be further opportunities for new primary schools as part of a larger development such as proposed at Wood Wharf and 3 Millharbour (where the school is on the lower floors of a building with residential use above). Site capacity for new secondary schools presents a more serious challenge because of the size of the accommodation required. The need for further site allocations to be secured through the Local Plan will be developed in the coming months.

Free Schools

- 3.17 In addition to the LA's proposals for additional capacity, free schools agreed by the Secretary of State contribute to the local supply of places. Free school proposers can apply direct to the Secretary of State who decides on the schools to be agreed. Creation of additional capacity outside the Council's control adds to the difficulties of planning. The current position with free schools in Tower Hamlets is:

*Canary Wharf College, East Ferry Road	Opened in September 2011, 40 places per year (primary)
*Wapping High School, Commercial Road	Opened in September 2012, 81 places per year (secondary)
*Solebay Primary School, Solebay Street	Opened in September 2012, 50 places per year, now operates at 60 places per year.
City Gateway	Opened in September 2012, 14-19 provision
*Canary Wharf College 2	Opened in September 2014, 40 places per year (primary). Occupying temporary accommodation. Permanent site in Glenworth Road, E14 in development.
*London Enterprise Academy, Commercial Road	Opened in September 2014, 11-16 school with 120 places per year.
East London Academy of Music	Opened in September 2014 in temporary accommodation in E15, 16-19 with up to 300 places. Permanent accommodation in development in Bromley-by-Bow for to be occupied in 2017
Mulberry UTC (University Training College)	14-19 provision, specialising in healthcare and medical services, and digital technology. Opening planned for September 2017, Parnell Road, E3
Aldridge Studio School	14-19 provision, specialising in entrepreneurship. Opening to be confirmed. Original proposal to be based at Asda Crossharbour site but now searching alternative site which could be outside LBTH
*Canary Wharf College 3	Approved for opening September 2015 but deferred to September 2016. Originally approved as an all-through Christian faith school with 1330 places, opening will be for secondary only offering 40 Year 7 places for September 2016. Pupils will initially occupy temporary accommodation. Permanent accommodation and planned capacity to be identified.
Livingstone Academy East London	Approved for opening in September 2017. All-through, mixed, non-faith school with 1,570 places. Site to be confirmed but expected to be in Aldgate. Specialising in computing and sciences.

* = capacity shown on Appendix A tables

Commissioning new school places

- 3.18 LAs have a statutory duty to provide sufficient school places. Changes to the law in recent years have emphasised the role of LAs as commissioners of school places rather than the provider. The option to open a new community school where a new school is needed is the last alternative after others have been exhausted. Where the LA identifies the need for extra school capacity, it is the LA's responsibility to fund the capital costs of the expansion or new school, including securing the site for a new school.
- 3.19 Where the need for a new school is identified, LAs are not able to open a new community school. The 2011 Education Act introduced the "free school presumption". (NB. free schools and academies are legally the same type of school).
- 3.20 The "free school presumption" process involves the LA setting the specification for the school. This includes the size and type of school and the community it is to serve. The selection of the school operator is based on the specification and so this is an important document.
- 3.21 The LA seeks expressions of interest from approved free school or academy providers, following a procedure set out by the DfE. The LA evaluates the bids and submits them to the Secretary of State. The decision on the appointment of a provider is taken by the Secretary of State, delegated to the Regional Schools Commissioner, who will then enter a funding agreement with the appointed provider. Existing academies or free schools are able to bid to operate new schools, providing they have obtained approved provider status from the DfE.
- 3.22 The LA must set its specification for the new school before it seeks the expressions of interest. This is the key document to ensure that a provider is appointed who can deliver the specification. The specification will set some key matters in addition to the basic details such as the size of the school and opening date. These include the need for a strong education vision, engagement with the local community, providing inclusive education and support for all children and operating as the local school for the community. The Tower Hamlets specification will include a requirement to support THE Partnership.
- 3.23 A number of the proposals referred to in this report will require the free school presumption process to be followed for the appointment of a provider. The first to be opened will be the new primary school at the former Bromley Hall School site. The process and proposed timetable is set out below. The DfE guidance sets out the process in general terms but is not prescriptive about timescales and consultation for all stages. The LA can determine its preferred process.

Proposed timetable and consultation

- 3.24 A Tower Hamlets generic school specification has been confirmed in consultation with the Mayor and Lead Member. This specification it will form the basis of all future school commissioning. Each new school's specification will then include the details for that school in addition to the generic requirements.
- 3.25 Subject to agreement to the recommendation of this report, consultation on the proposed specification for the new Bromley Hall School will take place. The outcome will be reported back to Cabinet in December 2016 with recommendations to adopt the specification (as amended by consultation) and to seek Expressions of Interest (Eols) for providers for Bromley Hall. The bids for the Eols are publicised by the LA as well as the requirement for them to be available on the DfE website.
- 3.26 When the Eols have been received, the LA submits them to the DfE. The LA makes its own evaluation of the submissions and submits that to the DfE. The Regional Schools Commissioner, on behalf of the Secretary of State, takes account of the LA's evaluation in making its own evaluation and decision on appointment of the provider. The LA can ask the DfE to be represented on the evaluation process as observer or participant.
- 3.27 This proposed timetable would allow the school provider to be appointed with sufficient mobilisation time before the opening of the school in September 2018.

School specification confirmed – linked to TH Schools Partnership principles	Confirmed in consultation with the Mayor and Lead Member	August	
September 2016 Cabinet report – Annual School Places Review	Confirms start of process to consult and commence “free school presumption”	6 Sept	
Consult on school specification for Bromley Hall Primary	Public consultation on specification and opening proposals. Allows potential bidders to consider/prepare/get approved bidder status	12 Sept - 7 October	4 weeks
Review consultation outcome and report to Cabinet	Decisions to: - approve specification for Bromley Hall - seek Eols for Bromley Hall provider	6 Dec 16	
Publish specification and call for Eols		Jan 17	6 weeks

Submit to Eols to DfE at closing date; LA completes its evaluation and submits to DfE		mid-Feb	4 weeks
DfE appoints provider		April 17	4 weeks? (not specified)

Funding Considerations

- 3.28 The principal source of capital funding for providing additional school places is the DfE basic need capital grant. The DfE has confirmed the funding for the period of 2015/16 – 2018/19 of £35.4m. This is formula based and does not reflect post-16 need or specific SEN growth.
- 3.29 The capital programme of new school capacity is supported by use of s. 106 receipts which have been secured to mitigate the impact of new housing developments. Significant sums have been agreed but not yet received. There is no certainty about receiving the full value of the agreed sums as this will depend on the developers' programmes so this presents some difficulties in planning use of the receipts.
- 3.30 The Council adopted its CIL (Community Infrastructure Levy) charging from April 2015. This replaces s. 106 payments for the mitigation of the impact of new developments on school provision. The Council's Infrastructure Delivery Plan (IDP) identifies the need for additional school places as part of planning the overall social infrastructure. The flow of CIL income at this stage remains uncertain. Children's Services and D&R Directorates continue to work together on the longer term infrastructure planning.
- 3.31 When the funding strategy for new school projects is being developed, these funding sources will be considered and decisions recommended through the governance arrangements.
- 3.32 This report has discussed the impact of the slowing of the rate of increase in need for primary school places and the deferment of the proposed new Bow Primary School. Given the need to plan for funding new secondary provision, it is prudent not to incur expenditure on primary capacity where funding will be required for a new secondary school. The changing trend of primary need will be reflected in the formula allocation of basic need capital grant from the DfE in future years.

4. COMMENTS OF THE CHIEF FINANCE OFFICER

- 4.1 This report is drawing attention to the regulatory framework for school place planning and how this can impact on site disposal or development proposals beyond the education estate. Decisions on site disposal or development will have various financial implications particular to the circumstances.

- 4.2 Meeting the Authority's statutory duty with regard to providing sufficient school places will require significant additional resources, as has been advised in previous reports on school place planning. The cost of a form of entry (FE) for primary will be approximately £6.5m (with up to an additional 6 primary FE needed over the next ten years) and a secondary FE is also estimated at £6.5m (with an expected 28 FE required over the next ten years). This points to an estimated cost of £221m at current prices to fund the additional capital costs over the next ten years.
- 4.3 The £35.4m capital funding identified from the Department for Education for 2015/16 to 2018/19 will assist, as will the creation of additional places through the establishment of free schools. Nonetheless, DfE capital does not necessarily cover London costs, nor does it cover site acquisition costs. The LA has agreed s.106 contributions which are used to support the provision of additional education facilities arising from new housing developments. These will be supplemented by the Community Infrastructure Levy (CIL) charges implemented by the Council from 2015. However, the flow of contributions depends on development activity so is outside the Council's control.
- 4.4 At this stage it is not possible to guarantee that sufficient capital resources in the form of Basic Need Grant or S106/ CIL contributions are available to meet the estimated costs of c £221m. The Council's capital strategy will need to consider therefore, in the context of its capital priorities, how any estimated gap will be addressed in order to meet its statutory obligations for providing sufficient school places.
- 4.5 The revenue consequences of additional pupils will in most cases be met from additional Dedicated Schools Grant, which varies largely according to pupil numbers. At present there are General Fund costs in the region of £1m associated with transporting (or providing travel support) for individual pupils where school places are not nearby. Changes to the admissions arrangements will ease that pressure, as will any efforts to provide additional school places.

5. LEGAL COMMENTS

- 5.1 Section 14 of the Education Act 1996 places a general duty on local authorities to secure sufficient primary and secondary schools in their area. Schools will be regarded as sufficient if they are sufficient in number, character and equipment to provide for all pupils the opportunity of appropriate education. Appropriate education means education which offers such variety of instruction and training in view of pupils' different ages, abilities and aptitudes and the different periods for which they may be expected to remain at school, including practical instruction and training appropriate to their different needs.
- 5.2 Section 14(3A) of the Education Act 1996 requires the Council to secure diversity of provision of schools and increasing opportunities for parental choice. The Council must consider and respond appropriately to parental

representations about school provision in relation to its functions under section 14 of the Education Act. The Council should give reasonable consideration to parental representations regarding the provision of schools in their area including outlining any proposed action to meet concerns raised about such provision.

- 5.3 Under section 6A of the Education and Inspections Act 2006 (inserted by paragraph 2 of the Schedule 11 to the Education Act 2011) and government guidance, any new school being set up must be an academy or a free school 'the academy/free school presumption'. There is a set process for the identifying the need for a new school. A Local Authority may seek proposals for a new academy and must inform the Secretary of State of the outcome who will then choose one of the proposers. A Local Authority must run a competition if that process produces no suitable proposer. Accordingly, normally a Local Authority will not be able to publish its own proposals for a new community or LA foundation school.

6. ONE TOWER HAMLETS CONSIDERATIONS

- 6.1 The LA has a statutory duty to ensure sufficient school places for local residents. Education is key to ensuring economic prosperity for the individual and for the community. The LA has a duty to ensure diversity of provision to enable parents to express their preference for a school place. These duties are taken into account in planning provision of school places. The plan to commission school places is universally applicable to children and young people of school age and there is unlikely to be unequal impact on different groups.
- 6.2 The LA has to plan for the overall social infrastructure to meet the needs of the rising local population. This informs the development of the Council's asset management and service planning to ensure that the required infrastructure is provided and that the competing needs are balanced.

7. BEST VALUE (BV) IMPLICATIONS

- 7.1 The report sets out proposals for meeting the need for school places. Proposals include making the best use of existing Council assets.
- 7.2 Implementation of capital schemes will be subject to competitive procurement. Proposals will be subject to consultation as they are developed and before implementation.

8. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

- 8.1 The proposals to provide additional school places to meet the needs of the population will be implemented taking account of sustainable design standards and materials. As far as possible primary school provision is planned to ensure that children can access a local school place and so minimise impact on travel.

9. RISK MANAGEMENT IMPLICATIONS

- 9.1 The Council has a statutory duty to provide sufficient school places. In order to plan to meet this need projections are obtained annually and reviewed each year against the known school capacity. It is clear that the projections indicate that a significant rise in the need for places has to be planned for. There may be variations in the projections so the Council has to retain some flexibility in its ability to respond to the need.
- 9.2 The plans required to meet the need for school places can often require the balance of complex and competing considerations, for example for other social infrastructure requirements. Because of the long time that is required to implement projects, decisions need to be taken in sufficient time to plan the use of resources and to identify shortfalls.
- 9.3 The Council has to manage the risk of failing to meet its statutory duties by having sufficient options available for implementation to meet the need and by keeping the changing circumstances under review

10. CRIME AND DISORDER REDUCTION IMPLICATIONS

- 10.1 There are no specific implications arising.

11. SAFEGUARDING IMPLICATIONS

- 11.1 The report deals with the Council's approach to providing school places for the local population. Ensuring the supply of good quality school places contributes to the safeguarding of children.

Linked Reports, Appendices and Background Documents

Linked Report

- NONE .

Appendices

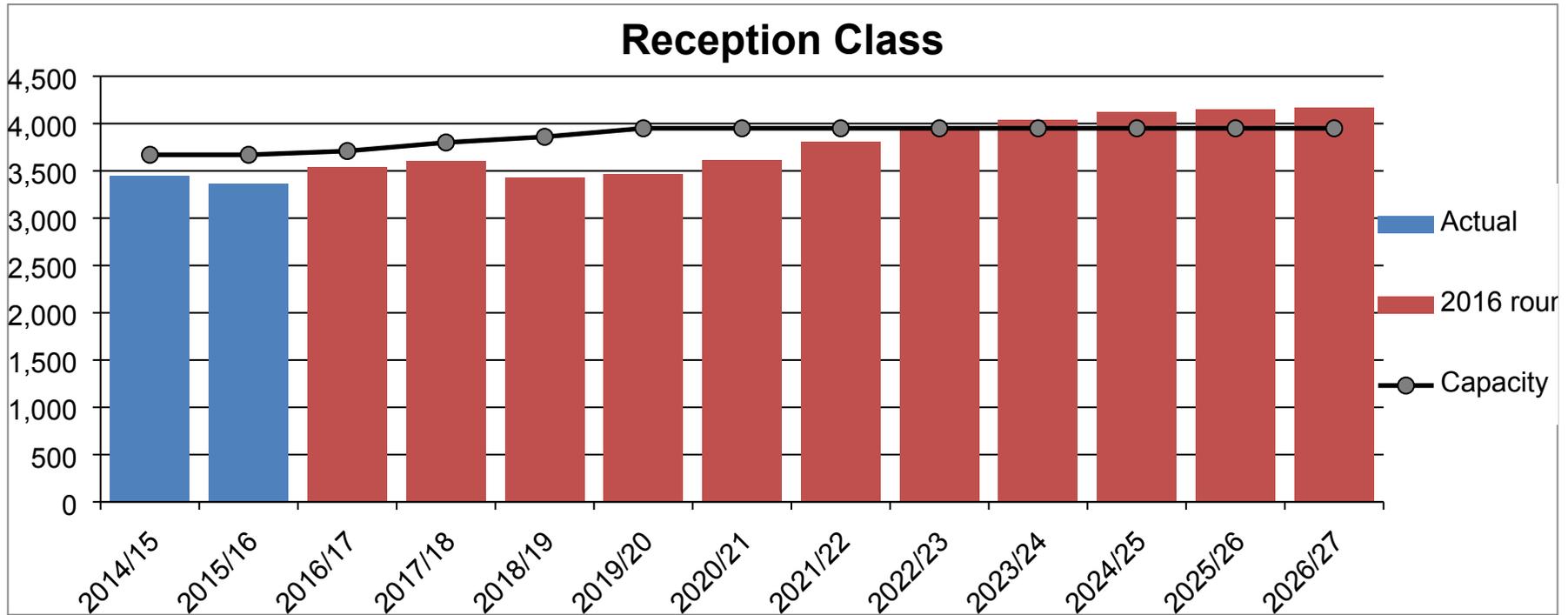
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Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012

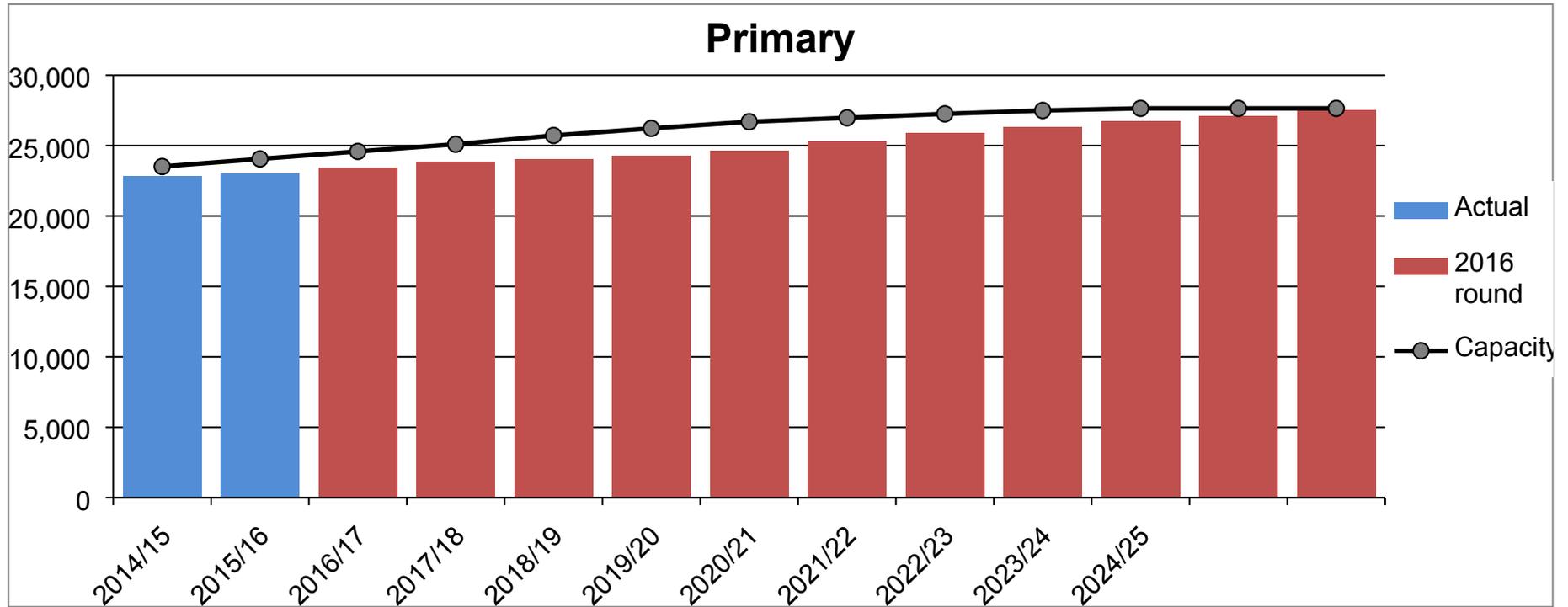
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Officer contact details for documents:

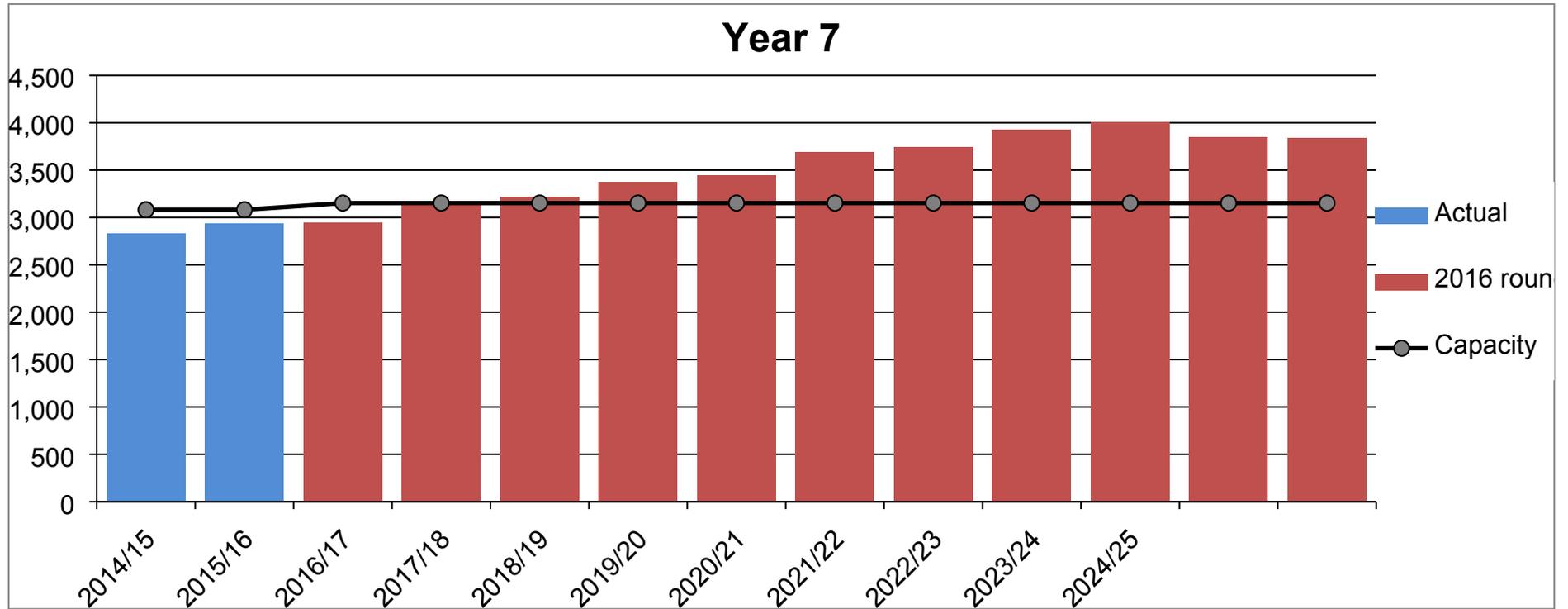
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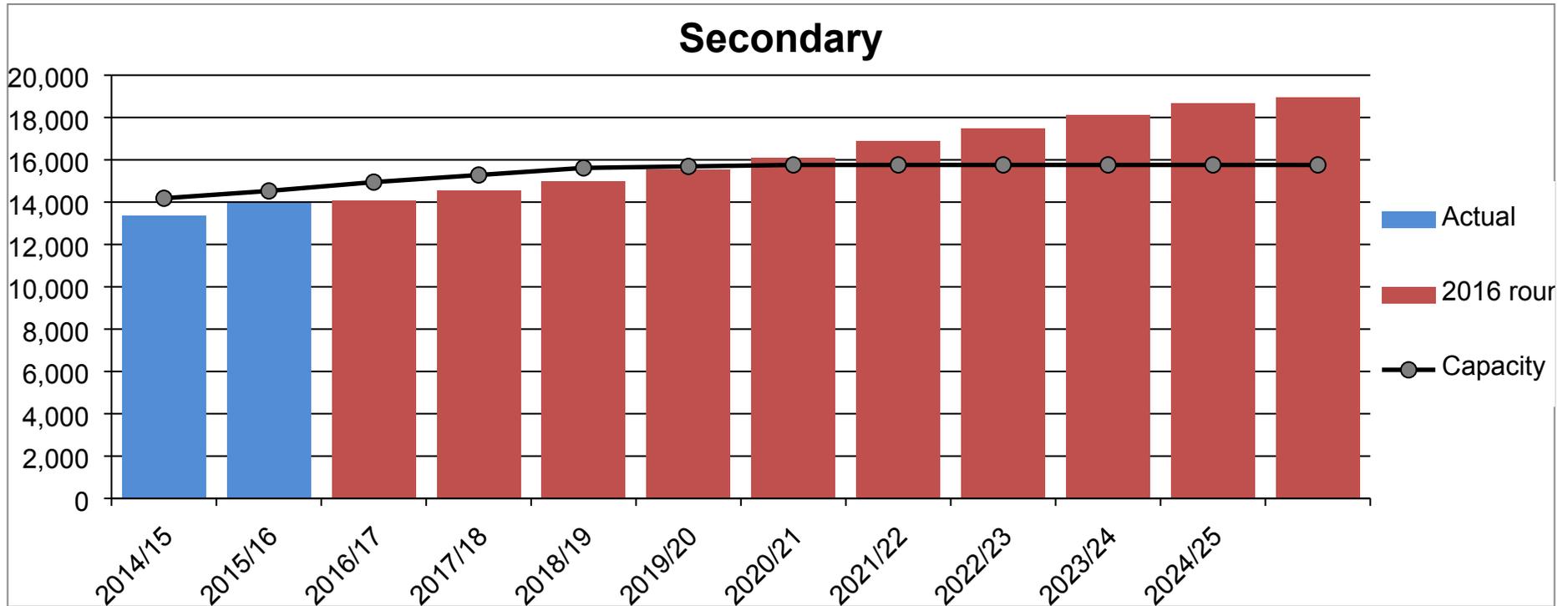
Reception	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
Actual	3,449	3,365											
2016 round			3,541	3,605	3,429	3,461	3,616	3,805	3,944	4,040	4,118	4,146	4,166
Capacity	3,670	3,670	3,710	3,800	3,860	3,950	3,950	3,950	3,950	3,950	3,950	3,950	3,950
Variance	221	305	169	195	431	489	334	145	6	-90	-168	-196	-216
FE	7.37	10.17	5.63	6.50	14.37	16.30	11.13	4.83	0.20	-3.00	-5.60	-6.53	-7.20
% Growth from prev. year		-2.4%	5.2%	1.8%	-4.9%	0.9%	4.5%	5.2%	3.7%	2.4%	1.9%	0.7%	0.5%



Primary	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
Actual	22,825	22,994											
2016 round			23,442	23,863	24,020	24,249	24,653	25,298	25,920	26,320	26,718	27,099	27,497
Capacity	23,517	24,056	24,587	25,098	25,632	26,136	26,606	26,886	27,166	27,406	27,556	27,646	27,646
Variance	692	1,062	1,145	1,235	1,612	1,887	1,953	1,588	1,246	1,086	838	547	149
FE	3.30	5.06	5.45	5.88	7.68	8.99	9.30	7.56	5.93	5.17	3.99	2.60	0.71
% Growth from prev. year		0.7%	1.9%	1.8%	0.7%	1.0%	1.7%	2.6%	2.5%	1.5%	1.5%	1.4%	1.5%



Year 7	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
Actual	2,829	2,932											
2016 round			2,942	3,165	3,216	3,372	3,443	3,687	3,743	3,927	4,007	3,849	3,839
Capacity	3,081	3,081	3,152	3,152	3,152	3,152	3,152	3,152	3,152	3,152	3,152	3,152	3,152
Variance	252	149	210	-13	-64	-220	-291	-535	-591	-775	-855	-697	-687
FE	8.40	4.97	7.00	-0.43	-2.13	-7.33	-9.70	-17.83	-19.70	-25.83	-28.50	-23.23	-22.90
% Growth from prev. year		3.6%	0.3%	7.6%	1.6%	4.9%	2.1%	7.1%	1.5%	4.9%	2.0%	-3.9%	-0.3%



Secondary	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
Actual	13,351	13,961											
2016 round			14,053	14,539	14,982	15,525	16,084	16,887	17,458	18,092	18,660	18,943	19,016
Capacity	14,183	14,529	14,946	15,282	15,618	15,689	15,760	15,760	15,760	15,760	15,760	15,760	15,760
Variance	832	568	893	743	636	164	-324	-1,127	-1,698	-2,332	-2,900	-3,183	-3,256
FE	5.55	3.79	5.95	4.95	4.24	1.09	-2.16	-7.51	-11.32	-15.55	-19.33	-21.22	-21.71
% Growth from prev. year		4.6%	0.7%	3.5%	3.0%	3.6%	3.6%	5.0%	3.4%	3.6%	3.1%	1.5%	0.4%

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<p>Cabinet</p> <p>6th September 2016</p>	 <p>TOWER HAMLETS</p>
<p>Report of: Zena Cooke, Corporate Director Resources Melanie Clay, Corporate Director Law, Probity and Governance</p>	<p>Classification: Unrestricted</p>
<p>Report of the Overview and Scrutiny Committee: Improving disabled and ethnic minority staff representation at the senior manager (LP07+) level</p>	

Lead Member(s)	Executive Mayor John Biggs Councillor David Edgar, Lead Member for Resources
Originating Officer(s)	Kevin Kewin, Interim Service Head, Corporate Strategy & Equality Stuart Young, Interim Service Head, HR and Workforce Development
Wards affected	All Wards
Key Decision?	No
Community Plan Theme	One Tower Hamlets

Executive Summary

This report submits the scrutiny report and recommendations for improving disabled and ethnic minority staff representation at the senior manager (LP07+) level. Accompanying the report is HR and Workforce Development’s response and accompanying action plan.

Recommendations:

The Mayor in Cabinet is recommended to:

1. Note the challenge session report;
2. Approve the proposed action plan in response to the recommendations.

1. REASONS FOR THE DECISIONS

- 1.1 Councillor Maium Miah, the Overview and Scrutiny Lead for Resources 2015/16 has initiated and completed a scrutiny challenge session on the council’s efforts to have a diverse senior management. The resulting report (appendix 1) provides 6 recommendations. HR the service responsible for this

area have provided an action plan in response to the recommendations. Cabinet are asked to approve the accompanying action plan.

2. ALTERNATIVE OPTIONS

- 2.1 Cabinet may decide to all accept all the recommendations or only some of the recommendations.

3. DETAILS OF REPORT

- 3.1 The challenge session took place on 10th February 2016 as a result of concern amongst some Members around the slow progress against the council's commitment to have a senior management that is reflective of the local disabled and ethnic minority communities. The council has been recognised for its efforts on LGBT inclusion and meeting its strategic priority for 50% of senior managers (LP07+) to be women.

- 3.2 The aim of the challenge session was to explore ways in which the council can improve ethnic minority and disabled staff representation at the senior management level (LP07+).

- 3.3 The session was underpinned by the following core questions:
- a) Is there a perception of a glass ceiling for ethnic minority and disabled staff?
 - b) Are there any positive action schemes in place and if so, are they having any effect?
 - c) How do we manage talent within the council?

- 3.4 The report with recommendations is attached at Appendix 1. There are 6 recommendations from the challenge session which are outlined below:

- **Recommendation 1**

The council should adopt a new talent management process for all staff to replace Navigate and actively promote the scheme to ethnic minority and disabled staff through all available communication channels.

- **Recommendation 2**

The council to ensure that all HR schemes and policies to improve ethnic minority and disabled staff representation at the senior manager level include clear objectives and intended results. These need to be communicated to all staff. Additionally, the impact of any implemented scheme and policy will need to be monitored.

- **Recommendation 3**

The council should reinvigorate the BAME and disabled staff forums and ensure that they are fit for purpose, are representative, are led by effective chairs and have senior champions whose roles are communicated clearly to all staff.

- **Recommendation 4**
The council undergoes an organisational culture audit focusing on diversity and inclusion. Specific areas of focus should include line management practice; talent management processes; the effectiveness of current equality and diversity training and staff engagement.
- **Recommendation 5**
The council should roll out a survey for all staff to provide their views on career development and any barriers, if any, that are perceived. The survey should seek a representative response, including from BAME and disabled staff.
- **Recommendation 6**
The council's HR service to provide a detailed action plan on how they will address any concerns raised through the survey with regular performance monitoring reports provided to the Tower Hamlets Equality Steering Group.

3.5 Comments from the services suggest that these activities will be considered as part of HR's implementation of a new Workforce Strategy for the council.

3.6 Over previous years the council has focused on local diversity targets that were not mapped across London and provided no comparison data from which to benchmark and measure success in this area. This approach has now developed through the creation of the Workforce Strategy and the Organisational Culture Plan, which provides a commitment to a broader representation of the whole community and to benchmarking workforce diversity across London.

3.7 This work has been influenced through external peer reviews by the Local Government Association (LGA), the Society for Local Authority Chief Executives (SOLACE) and Investors in People (IiP) and includes best practice and recommendations for future development. As such, the activities detailed in the action plan will form part of this work and will be delivered in line with this wider approach to promote and monitor workforce diversity and equality across all protected characteristics

3.8 Attached as Appendix 2 is the proposed action plan in response to the report and recommendations of the Overview and Scrutiny Committee.

4. COMMENTS OF THE CHIEF FINANCE OFFICER

4.1 The report makes a number of recommendations to improve ethnic minority and disabled staff representation at the senior management level (LP07+). These recommendations are expected to be delivered through existing budgets within HR and directorates. However, should additional resources be required to deliver the action plan, officers will be obliged to seek appropriate approval through the Councils financial approval process.

5. LEGAL COMMENTS

5.1 The council is required by section 9F of the Local Government Act 2000 to have an Overview and Scrutiny Committee and to have executive arrangements that ensure the committee has specified powers. Consistent with this obligation, Article 6 of the council's Constitution provides that the Overview and Scrutiny Committee may consider any matter affecting the area or its inhabitants. The Committee may also make reports and recommendations to the Full Council or the Executive in connection with the discharge of any functions.

5.2 When making decisions, the council must have due regard to the need to eliminate unlawful conduct under the Equality Act 2010, the need to advance equality of opportunity and the need to foster good relations between persons who share a protected characteristic and those who do not. A proportionate level of equality analysis is required to discharge the duty and information relevant to this is contained in the One Tower Hamlets section of the report

6. ONE TOWER HAMLETS CONSIDERATIONS

6.1. Workforce diversity is an activity in the council's Strategic Plan and Single Equality Framework. Having a workforce that is able to serve the community and deliver services that appropriate to local needs is a key priority for the council.

7. BEST VALUE (BV) IMPLICATIONS

7.1 Section 3 of the Local Government Act 1999 requires the council as a best value authority to "make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness". The activities and measures in the proposed action plan will be monitored helping to fulfil this obligation.

8. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

8.1 Not applicable.

9. RISK MANAGEMENT IMPLICATIONS

9.1 Workforce diversity activities and milestones are found in the council's Strategic Plan and SEF. The Strategic Plan and SEF provide a strategic framework for other strategies and plans. Risks relating to the achievement of its objectives are therefore monitored through the council's corporate risk register and directorate risk registers. Risks are assessed for likelihood and impact, and have responsible owners and programmes of mitigating actions.

10. CRIME AND DISORDER REDUCTION IMPLICATIONS

10.1 Not Applicable.

11. SAFEGUARDING IMPLICATIONS

- 11.1 Having a diverse workforce will allow the council to fully understand the safeguarding issues that people in our communities may face.
-

Linked Reports, Appendices and Background Documents

Linked Report

- **Appendix 1** – Workforce diversity challenge session report

Appendices

- **Appendix 2** – Action Plan

Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012

- None

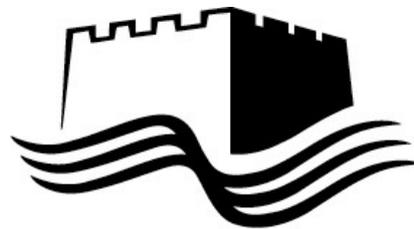
Officer contact details for documents:

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**Improving Disabled and Ethnic Minority staff representation at the
senior manager (LP07+) level**

Scrutiny Challenge Session Report



TOWER HAMLETS

**London Borough of Tower Hamlets
March 2016**

Chair's Foreword

Councillor Maium Miah, Scrutiny Lead for Resources

The council is committed to ensuring that its workforce is reflective of the community and has rightfully set targets for its senior management in terms of women, disability and ethnicity (specifically ethnic minorities). This scrutiny challenge session looked at the progress at senior management level that the council has made in this area and recommends areas for improvement.

The review invited staff forum representatives from the BAME staff forum, Disabled staff forum, HR officers and Councillors with an interest in developing a workforce to reflect the community, to evaluate the council's performance to date and foster improvement. Additionally, statements from the council's external recruitment agencies were also sourced.

Since 1998 the council has had a commitment to having a senior management team that reflects the community and has progressed in terms of representation of women. However, progress towards having an ethnically diverse senior management and representative levels of disabled senior managers has been challenging and not as rapid as hoped. This Challenge Session is a small but positive endeavour to boost the efforts and rejuvenate the focus on this important area.

More than two thirds (69%) of the borough's population belong to minority ethnic groups. Having a senior management and workforce that reflects the local community is important to ensure local needs, perspectives and priorities are addressed by the council and enable the council to deliver services that are appropriate and effective to improve outcomes for local people. It was clear throughout the challenge session that further work is needed to achieve a workforce to reflect the community particularly at senior management level. I hope that the recommendations outlined in this report are turned into reality.

I would like to thank everyone who participated in this challenge session, particularly the staff members who shared their perspectives, and the officers that supported the challenge session and helped inform the recommendations outlined in this report.

Cllr Maium Miah
Canary Wharf ward
07983 798 791

Summary of recommendations

RECOMMENDATION 1:

The council should adopt a new talent management process for all staff to replace Navigate and actively promote the scheme to ethnic minority and disabled staff through all available communication channels.

RECOMMENDATION 2: The council to ensure that all HR schemes and policies to improve ethnic minority and disabled staff representation at the senior manager level include clear objectives and intended results. These need to be communicated to all staff. Additionally, the impact of any implemented scheme and policy will need to be monitored.

RECOMMENDATION 3: The council should reinvigorate the BAME and disabled staff forums and ensure that they are fit for purpose, are representative, are led by effective chairs and have senior champions whose roles are communicated clearly to all staff.

RECOMMENDATION 4: The council undergoes an organisational culture audit focusing on diversity and inclusion. Specific areas of focus should include line management practice; talent management processes; the effectiveness of current equality and diversity training and staff engagement.

RECOMMENDATION 5: The council should roll out a survey for all staff to provide their views on career development and any barriers, if any, that are perceived. The survey should seek a representative response, including from BAME and disabled staff.

RECOMMENDATION 6: The council's HR service to provide a detailed action plan on how they will address any concerns raised through the survey with regular performance monitoring reports provided to the Tower Hamlets Equality Steering Group.

1. INTRODUCTION

- 1.1. Tower Hamlets is one of the most diverse boroughs in the country with over half of residents in the borough from an ethnic minority background. Since 1998 the council has prioritised having a workforce that reflects the community (WFTRC). Strategic targets for senior managers (LP07) were developed for disabled, women and ethnic minority staff.
- 1.2. WFTRC is a key activity in the council's single equality framework and strategic plan. Having a workforce that reflects community ensures that council services are delivered appropriately for the community and local needs are fully understood.
- 1.3. The aim of the challenge session was to explore ways in which the council can improve ethnic minority and disabled staff representation at the senior management level (LP07+)
- 1.4. The session was underpinned by the following core questions:
- Is there a perception of a glass ceiling for ethnic minority and disabled staff?
 - Are there any positive action schemes in place and if so, are they having any effect?
 - How do we manage talent within the council?
- 1.5. The session was chaired by Councillor Maium Miah (Scrutiny Lead Resources) on Wednesday 10th February 2016. The session took the form of a presentation by the Service Head for HR and Workforce Development and the Senior HR Manager, a statement from one of the procured recruitment agencies, Green Park, and a roundtable discussion.
- 1.6. The session was attended by:

Councillor Maium Miah	Scrutiny Lead Resources
Councillor Amina Ali	Vice-Chair of the Somali Taskforce and Chair of Health Scrutiny Panel, LBTH
Councillor Oliur Rahman	LBTH
Simon Kilbey	Service Head, HR and Workforce Development, LBTH
Corinne Hargreaves	Senior HR Manager, LBTH
Leo Nicholas	Senior Strategy, Policy and Performance Officer, LBTH
Assan Ali	Staff forum representative, LBTH
Lorina Dujon	Staff forum representative, LBTH

Sarla Meisuria	Staff forum representative, LBTH
Ali Khan	Advisor to the Independent Group, LBTH

2. THE COUNCIL'S COMMITMENT TO A WORKFORCE TO REFLECT THE COMMUNITY (WFTRC)

Context of a WFTRC

- 2.1 The Council's Workforce to Reflect the Community Strategy was introduced in 1998 to:
- Make positive steps towards combating poverty in the borough by opening up job and training opportunities to local people, particularly targeting those groups within the community who are under-represented in the workforce.
 - Work towards more responsive service delivery by employing more local people from under-represented groups.
 - Promote the Council as a responsible employer.
- 2.2 Targets were set for the percentage of top 5% earners, senior managers (LP07+), who are disabled, women or from an ethnic minority. Additionally, targets for the total workforce were set. These targets have featured in the council's strategic priorities since the strategy was introduced in 1998.
- 2.3 In 2014/15 the council set a target for 50% of senior managers (LP07+) to be women, this target was essentially reached, in 2014/15 49.89% of top earners were women.

Current performance for ethnic minority and disabled managers

- 2.4 Currently 26.85% of top earners are from an ethnic minority. A target of 30% has been set for 2015/16. However, 49.3% of the working age population in the borough is from an ethnic minority.
- 2.5 The disabled target for top earners within the council is 11.8%, which is the same as percentage of the working age population with a disability in the borough according to the 2011 Census. Currently 8.17% of top earners within the Council have a disability.

Legislation

- 2.6 The council's commitment to having a senior management that reflects the community is supported by two pieces of legislation. The Equality Act 2010 and the Local Government and Housing Act 1989.
- 2.7 Under the Equality Act 2010, the council must in the exercise of its functions, have due regard to the need to:
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act.
 - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

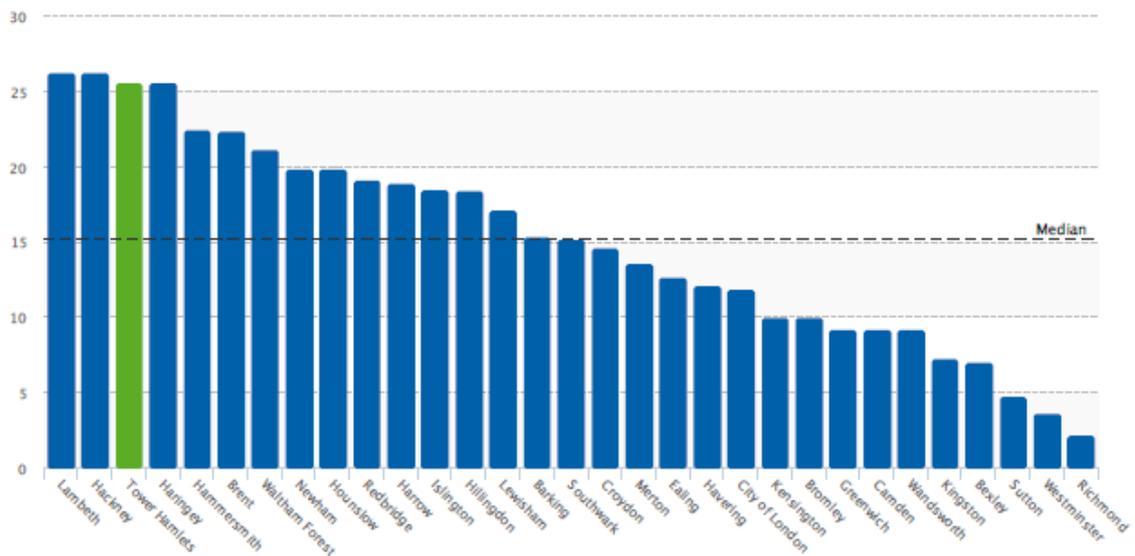
- Foster good relations between persons who share a relevant protected characteristic¹ and persons who do not share it.
- 2.6 Section 7 of the Local Government and Housing Act 1989 provides that all appointments should be made on merit; however section 159 of the Equality Act 2010 allows employers to use positive action on a case by case basis when recruiting and promoting. Additionally, the Act makes it lawful to select the candidate from a disadvantaged or underrepresented group where two candidates are both ‘as qualified’ as each other.

Performance in comparison to other local authorities

2.7 The tables below show Tower Hamlets’ performance against other local authorities when comparing the number of ethnic minority and disabled top 5% of earners. Tower Hamlets is one of the highest performing local authorities; however data showing each local authorities performance against their community is not available. Tower Hamlets council appears to be the only local authority in London with a commitment to having a workforce that reflects the community as a strategic priority.

Ethnicity - Percentage of top 5% earners: BAME

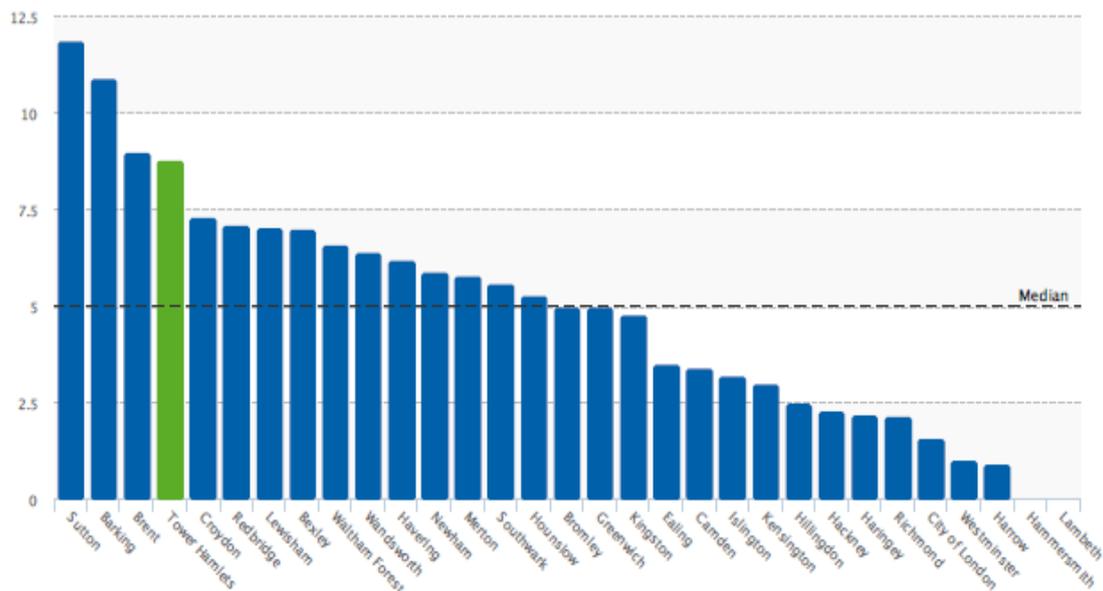
The following analysis excludes Councils that have not yet submitted data for this metric, ie: Barnet, Enfield.



¹ There are nine protected characteristics defined by the Equality Act 2010. They are: pregnancy & maternity; age; disability; gender reassignment; race; religion or belief; sex; sexual orientation and marriage & civil partnership.

Disability - Percentage of top 5% earners who are disabled

The following analysis excludes Councils that have not yet submitted data for this metric, ie: Barnet, Enfield.



The council's policy – positive action

- 2.9 Since 2006 the council has phased out all positive action schemes (the last positive action scheme was suspended in 2010); with all activities open to all staff, with targeted promotion to encourage take up from certain groups of staff, including ethnic minority and disabled staff members.
- 2.10 Current activities in place which are advertised to ethnic minority and disabled staff include:
- Mentorwise - a staff development opportunity to support individual career aspirations. The council has joined the London mentoring network MyMentor, which provides an online matching system for mentees to identify suitable mentors. The system also allows staff to have access to a wide and diverse pool of potential mentors in different public sector organisations, should an internal mentor not be available.
 - Disability awareness days – staff and managers are provided with information on supporting staff with disabilities. External organisations are invited to provide talks. Information on reasonable adjustments, flexible working and access to work payments are made readily available.
 - Navigate – the council's internal talent management scheme. Its aim is to develop potential leaders and managers of the future and support progression. Participants receive development in the form of psychometric assessments; in-depth 1-2-1s; coaching and secondment and/or shadowing opportunities.

The council's policy – internal recruitment of senior managers

- 2.11 The council has several policies in place to ensure that the recruitment and selection processes for senior management vacancies are fair and robust. These processes are managed and monitored by the council's HR and workforce development service and in the case of Service Heads and above, by a Member level HR Appointment Committee.
- 2.13 Recruitment training – in order for a staff member to sit on a recruitment panel, mandatory recruitment licensing training must be completed. This training covers the council's duty in the Equalities Act; unconscious bias; the council's policy on discrimination and the recruitment process.
- 2.14 Elected Members sit on the recruitment panels for vacancies that are Service Head level or above. They undergo mandatory recruitment training and are supported by the Service Head for HR and Workforce Development. Recruitment panel selections are ratified by the HR appointments committee.
- 2.15 Recruitment panels – All recruitment panels for council vacancies must be diverse with an expectation that panel members represent a range of the protected characteristics under the Equality Act 2010. A member of HR is required to sit on the panel for vacancies that are LP07 and above. It is their responsibility to ensure that the panels are diverse.
- 2.16 Internal recruitment first – all vacancies are advertised internally, vacancies that are below Service Head level are exclusively advertised internally and are only put out for external advertisement should the role not be filled internally.
- 2.17 'Take a Chance' scheme – this scheme is a new approach. The aim is to offer an individual who comes close to being offered a job the chance to be permanently appointed following a six month 'probationary' period supported by a programme of development. The scheme applies to posts PO3 and above (to the service manager level) that are advertised internally.

The council's policy – external recruitment, Service Head and above

- 2.16 Vacancies that are for Service Head and above are advertised internally and externally, in order to ensure the best person for the senior leadership role is found. Recruitment agencies are used to source suitable candidates for these posts.
- 2.17 The council has a procurement framework in place to undertake the recruitment of Service Head and above positions. The framework is

made up of 4 organisations and an equalities statement is submitted as part of the tender quotation for each post.

- 2.18 The quotation evaluation criteria that is used during the external recruitment process is detailed below, “evidence of identifying and sourcing diverse candidates’ has the second highest score weighting.

Quality Criteria	Criterion weighting (multiplier x)
Knowledge of role	4
Knowledge of Tower Hamlets	1
Market Knowledge	2
Experience in recruiting to similar role	4
Experience in recruiting for other London boroughs or similar organisations	1
Evidence of innovative solutions in addressing market challenges	1
Evidence of innovative solutions in improving decision-making	1
Evidence of identifying and sourcing diverse candidates.	3
Evidence of commitment to Equality and Diversity in recruitment processes	1
Resources Allocated (named consultants)	1
Flexibility in pricing and cost in line with expectations and budget.	2

Penna’s external recruitment process

- 2.19 Penna, the main recruitment agency that the council uses for external posts (at Service Head and above level), provided a submission of their recruitment processes.
- 2.20 Penna focus on attracting a diverse readership by advertising in media (both on and offline) that have a highly diverse readership. This includes mailing up to 100+ diversity groups across London that circulates vacancies to their networks and communities.
- 2.21 Where appropriate, they also undertake a targeted search into markets/sectors which have high levels of diversity in their workforce and good transferable skills. This ensures that the application and selection processes are highly accessible; meet best practice standards and do not consciously or unconsciously disadvantage any candidate.

3. KEY FINDINGS AND RECOMMENDATIONS

- 3.1 The session began by exploring HR's efforts to reaching a senior management that is representative of the ethnic minority and disabled communities in Tower Hamlets. The Service Head for HR and Workforce Development and the Senior HR Manger provided a presentation.

Talent Management

- 3.2 The session initially focused on talent management and the process of developing staff who will eventually become the senior leadership within the council. The challenge session noted these are challenging times for the council, with government funding reductions and a shrinking pool of senior manager posts. However, it was felt that developing staff, middle managers and team leaders in particular, should still be a priority.
- 3.3 It was noted that the council has a talent management scheme in place called 'Navigate'. The scheme is linked to the PDR process and open to all staff. The scheme offers coaching and tuition but its impact on progression was questioned. Navigate as a scheme is advertised to all staff but attendees from the BAME and disabled staff forums felt that the approach to enrolment should be specifically targeted towards ethnic minority and disabled staff members.
- 3.4 HR confirmed that a review focusing on the impact of Navigate and its reach is being undertaken. Attendees agreed with the need for a review and suggested a new talent management scheme is developed to replace Navigate.

RECOMMENDATION 1:

The council should adopt a new talent management process for all staff to replace Navigate and actively promote the scheme to ethnic minority and disabled staff through all available communication channels.

Existing HR policies and their impact

- 3.5 The session considered the impact of existing HR policies on representation of ethnic minority and disabled staff at the LP07+ level. It was felt by attendees that HR had implemented a large number of policies and schemes in order to facilitate an improvement but these were poorly understood by managers and staff and there is a need for clearer outcomes.
- 3.6 The HR Senior Manager confirmed that there was concern about the low number of staff being promoted through the "Take A Chance" initiative and only a handful of recruiting managers had used the scheme. Additionally, it was confirmed that all managers were given

essential training in 2014/15 which focused on the importance of equality and diversity within teams, the benefits of a diverse workforce and best practice when recruiting.

- 3.7 Attendees felt that HR's approach to recruiting a diverse senior management was welcomed but there were some crucial aspects missing. Staff forum members felt that managers' understanding of HR policies and schemes needs to be improved. There was a feeling that junior staff members were not progressing due to poor managerial understanding about schemes such as 'Take A Chance' and 'Navigate'. It was felt that clear expected outcomes need to be communicated to staff before a policy and/or scheme is implemented. Additionally, there is a need to monitor the impact of these schemes and whether they are contributing to increased levels of ethnic minority and disabled staff within the senior management cohort.

RECOMMENDATION 2: The council to ensure that all HR schemes and policies to improve ethnic minority and disabled staff representation at the senior manager level include clear objectives and intended results. These need to be communicated to all staff. Additionally, the impact of any implemented scheme and policy will need to be monitored.

The role of the staff forums

- 3.8 It was recognised by session attendees that the staff forums have a significant role to play in having a senior management with good representation of disabled and ethnic minority staff. Forum representatives felt that the disabled and BAME staff forums needed a clearly defined role and purpose.
- 3.9 It was brought to the meeting's attention that the disabled staff forum needed a chair and issues such as representation of disabled staff at the senior management could not be discussed without some sort of leadership in place for this forum.
- 3.10 The Service Head for HR and Workforce Development highlighted the diversity of CMT and the strength of the council's leadership as a consequence. Attendees felt that CMT should be portrayed as role models to staff forum members and their role as senior champions for ethnic minority and disabled staff should be communicated to the workforce clearly and routinely.

RECOMMENDATION 3: The council should reinvigorate the BAME and disabled staff forums and ensure that they are fit for purpose, are representative, are led by effective chairs and have senior champions whose roles are communicated clearly to all staff.

Organisational culture audit

- 3.11 Attendees felt that the organisational culture within the council needed to be addressed. It was noted that although the number of ethnic minority senior managers had improved year on year, progress was slow. Additionally, awareness around employees with a disability could be improved.
- 3.12 Issues such as managerial understanding about: reasonable adjustments in the workplace; access to work support for disabled staff; flexible working arrangements; the importance of development opportunities and training and the benefits of recruiting a diverse workforce need to be addressed.
- 3.13 The session received a statement from Green Park, one of the recruitment agencies used to externally recruit Service Heads and above. Green Park reiterated their belief in the robustness of the council's recruitment processes but a possible barrier to having a senior management that is representative of the local disabled and ethnic minority communities could be the organisational culture and this should be explored further.
- 3.14 Attendees from the staff forums were in agreement. A member of the BAME staff forum confirmed that the forum has always had ethnic minority representation at the senior management level as one of the forum's priorities. Forum members felt that staff need to be consulted on the barriers to progression for disabled and ethnic minority staff and how these could be overcome.

RECOMMENDATION 4: The council undergoes an organisational culture audit focusing on diversity and inclusion. Specific areas of focus should include line management practice; talent management processes; the effectiveness of current equality and diversity training and staff engagement.

RECOMMENDATION 5: The council should roll out a survey for all staff to provide their views on career development and any barriers, if any, that are perceived. The survey should seek a representative response, including from BAME and disabled staff.

RECOMMENDATION 6: The council's HR service to provide a detailed action plan on how they will address any concerns raised through the survey with regular performance monitoring reports provided to the Tower Hamlets Equality Steering Group.

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SCRUTINY REVIEW ACTION PLAN: Improving disabled and ethnic minority staff representation at the senior manager (LP07+) level | Appendix 2

Action	Responsibility	Date
<p>Recommendation 1: The council should adopt a new talent management process for all staff to replace Navigate and actively promote the scheme to ethnic minority and disabled staff through all available communication channels. <i>[responsibility: Stuart Young]</i></p>		
<p>Comment from service: This action is already in the Workforce Strategy and is scheduled for 2018/19. We will promote the talent management scheme which will aim to develop the most talented individuals within the council. We will promote this to all employees with particular publicity to encourage interest from ethnic minority and disabled staff.</p>		
<p>Implement a talent management programme, in partnership with other boroughs, to develop the attributes of a 21st century public sector worker. This will include targeted elements of staff engagement based on best practice to actively promote the scheme to ethnic minority and disabled staff.</p>	<p>Stuart Young</p>	<p>Sept 2018</p>
<p>Regular engagement and publicity through staff forums</p>	<p>Stuart Young</p>	<p>Oct 2018</p>
<p>Recommendation 2: The council to ensure that all HR schemes and policies to improve ethnic minority and disabled staff representation at the senior manager level include clear objectives and intended results. These need to be communicated to all staff. Additionally, the impact of any implemented scheme and policy will need to be monitored. <i>[responsibility: Stuart Young]</i></p>		
<p>Comment from service: Agreed. The annual equalities report will identify any areas of inequality within the workforce and identify mitigating actions, where appropriate. Where HR schemes or policies are agreed in relation to this area, the recommendation will be enforced.</p>		

SCRUTINY REVIEW ACTION PLAN: Improving disabled and ethnic minority staff representation at the senior manager (LP07+) level | Appendix 2

Annual equalities report presented to CMT, setting out objectives, with results publicised to staff	Stuart Young	Jul 2016
<p>Recommendation 3: The council should reinvigorate the BAME and disabled staff forums and ensure that they are fit for purpose, are representative, are led by effective chairs and have senior champions whose roles are communicated clearly to all staff. <i>[responsibility: Kevin Kewin and Stuart Young]</i></p>		
<p>Comment from service: Agreed. This will form part of a wider review of staff engagement, which is detailed in the Workforce Strategy for 2016/17. We will support and promote initiatives to encourage the forums to take a full and active role in staff engagement and relevant council business.</p>		
Undertake a wider full review of staff engagement systems and processes to ensure effective opportunities to consult and engage staff.	Stuart Young	Nov 2016
<p>Recommendation 4: The council undergoes an organisational culture audit focusing on diversity and inclusion. Specific areas of focus should include line management practice; talent management processes; the effectiveness of current equality and diversity training and staff engagement. <i>[responsibility: Stuart Young]</i></p>		
<p>Comment from service: Agreed. Discussions have taken place with the LGA and Enei (employers network for equalities and inclusion) to complete a joint audit in this area, for which LGA have indicated they may provide funding. This would be used as a pilot for other authorities to follow.</p>		
Progress discussions regarding the partnership audit approach, agreeing scope, desired outcomes, timescales and funding to complete the audit.	Stuart Young	Sept 2016
<p>Recommendation 5: The council should roll out a survey for all staff to provide their views on career development and any</p>		

SCRUTINY REVIEW ACTION PLAN: Improving disabled and ethnic minority staff representation at the senior manager (LP07+) level | Appendix 2

barriers, if any, that are perceived. The survey should seek a representative response, including from BAME and disabled staff. <i>[responsibility: Stuart Young]</i>		
Comment from service: Agreed. This will be included in the staff survey, which is an action identified in the Workforce Strategy for 2017/18		
Undertake a staff survey to identify areas of organisational strength and weakness.	Stuart Young	May 2017
Recommendation 6: The council's HR service to provide a detailed action plan on how they will address any concerns raised through the survey with regular performance monitoring reports provided to the Tower Hamlets Equality Steering Group. <i>[responsibility: Stuart Young]</i>		
Comment from service: Agreed. This will be undertaken following the analysis of recommendation 5 and will be monitored as appropriate. The promotion of a detailed action plan is likely to require ownership across the organisations. HR will develop this plan with a view to agreement by CMT following discussion with THESG		
Outcome of the Staff Survey report produced and reported to the Equalities Steering Group	Stuart Young	July 2017
Outcome of the Staff Survey report produced and reported to the Corporate Management Team, with recommended actions	Stuart Young	August 2017

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Cabinet 6 th September 2016	 TOWER HAMLETS
Report of: The Director of Law, Probity and Governance and Corporate Director Communities, Localities and Culture	Classification: [Unrestricted]
Report of the Overview and Scrutiny Committee: Promoting a shared responsibility and removing barriers to improved recycling in the borough Scrutiny Challenge Report	

Lead Member	Cllr Ayas Miah
Originating Officer(s)	Vicky Allen, Corporate Strategy and Equality, LPG Directorate ext. 4320
Wards affected	ALL
Community Plan Theme	A Great Place to Live: Improve the local environment and public realm
Key Decision?	No

Executive Summary

This report submits the report and recommendations of the challenge session on promoting a shared responsibility and removing barriers to improved recycling in the borough by the Overview and Scrutiny Committee (OSC), and the action plan for implementation.

Recommendations:

The Mayor in Cabinet is recommended to:

1. Consider this report of the scrutiny working group and agree the action plan in response to the review recommendations.

1. REASONS FOR THE DECISIONS

- 1.1 This report submits the report and recommendations of the challenge session on promoting a shared responsibility and removing barriers to improved recycling in the borough by the Overview and Scrutiny Committee (OSC), and the action plan for implementation.
- 1.2 The challenge session took place on 19th January 2016 as a result of concerns amongst some Members that the council and its partners were not doing all that they could to support residents to improve their recycling habits. Waste and recycling is a key service for local authorities and dealing with waste represents a significant expense for the council at a time continuous decline in council resources. Sending

recyclable material to landfill and other waste facilities is both expensive and damaging to the environment. The Council's waste treatment and disposal costs could be reduced by an estimated £500,000 per year by increasing the amount of waste that is recycled and by reducing the levels of contamination in the recyclable waste that is collected which could help limit the impact of public sector cuts.

- 1.3 Whilst it is recognised that the Council is one of the best performing recyclers of dry recyclates in London it faces a particularly difficult and costly operational environment in relation to high rise food waste collection and severely limited operational opportunities to increase green waste recycling given the lack of private gardens. Notwithstanding this there was a concern that the borough's overall recycling rate is well below the London and England average, and significantly below the EU's 50 percent recycling target for the country by 2020.
- 1.4 Ensuring residents increase the amount of waste they recycle whilst reducing the amount of recycling that is contaminated is key to achieving the Councils' sustainability objectives as well as the savings identified above. Whilst there are well researched barriers to recycling which create a real challenge, the Council must nevertheless find ways to promote a sense of accountability amongst residents, landlords and landowners.
- 1.5 The aim of the challenge session was therefore to explore ways in which the Council and its partners could influence residents to increase the amount of recycling and to 'recycle right'; and how social housing landlords and landowners can work together to facilitate this.

2. ALTERNATIVE OPTIONS

- 2.1 To take no action. This is not recommended as the proposed recommendations are strategic, measurable and attainable. A timetable for delivering the recommendations has also been agreed by Officers at the most senior levels of the organisation. The action plan is outlined in Appendix Two.
- 2.2 To agree some, but not all recommendations. As outlined above all of the recommendations are achievable at little additional cost to the organisation. Although the Scrutiny Review Group is confident all the recommendations will be addressed, there may be reasons for not accepting all of them.

3. DETAILS OF THE REPORT

- 3.1 The challenge session took place on 19th January 2016 and was chaired by Cllr Denise Jones, Scrutiny Lead for Communities, Localities and Culture.

- 3.2 The session was underpinned by three core questions:
- a) What actions can the council and its partners take to inform residents of the importance of recycling and to encourage residents to increase the amount of recycling they do and reduce the amount that is contaminated?
 - b) How can landlords, landowners, managing agents, and developers improve recycling facilities on their estates and how can they facilitate residents to recycle more, and recycle right. And how can the council support this?
 - c) What financial opportunities can the council access to support recycling activities and what the options to use S106 planning obligations or the Community Infrastructure Levy are?
- 3.3 The report with recommendations is attached as Appendix 1. 12 recommendations have been made:
- **Recommendation 1:** Review the Local Reward Scheme running in the borough with a view to implementing it more widely.
 - **Recommendation 2:** Promote and coordinate visits to the Material Recovery Facility (MRF) for residents and estates staff.
 - **Recommendation 3:** Promote messages about recycling to residents through ESOL sessions.
 - **Recommendation 4:** Improve communication and education campaigns by making the additional costs associated with dealing with contaminated recycling waste explicit. Include clear explanatory messages about issues such as food waste and using black bin liners.
 - **Recommendation 5:** Promote recycling messages on paper communications from the council (e.g. envelopes).
 - **Recommendation 6:** Improve the size, quality, quantity and distribution of bags provided for residents for recycling waste, for example:
 - Introduce smaller bags;
 - Increase the number of bags produced to meet demand; and
 - Increase the number of collection points bags can be obtained
 - **Recommendation 7:** Introduce a re-balancing of general and recycling waste bins on estates in the borough
 - **Recommendation 8:** Undertake a feasibility study to assess the suitability of a range of alternative service design improvements including re-use facilities in the borough.

- **Recommendation 9:** Promote the THHF public-realm sub group, encourage attendance and the sharing of good practice amongst Registered Providers.
- **Recommendation 10:** Amend Local Plan policy DM14 Managing Waste to provide more explicit guidance on waste and recycling facilities.
- **Recommendation 11:** Work with developers to incorporate innovative general waste and recycling waste management systems into the Isle of Dogs opportunity area, area planning framework where possible.
- **Recommendation 12:** Lobby Government to require packaging industry to include standardised recyclability messages on all recyclable material.

3.4 These recommendations will be considered as part of the Strategic Review of the Waste Service, at the contract specification stage, and as part of the Local Plan review. No additional resourcing implications have been identified by services involved.

4. COMMENTS OF THE CHIEF FINANCE OFFICER

4.1 The report seeks agreement to the draft action plan that focusses on promoting a shared responsibility and removing barriers to improved recycling in the borough.

4.2 In Appendix 1 of this report it highlight opportunities for the Council to reduce the waste treatment and disposal costs by an estimated £500,000 per year by increasing the amount of waste that is recycled and by reducing the levels of contamination in the recyclable waste that is collected. This is achievable from the cost per tonne differential in sending waste for recycling as opposed to sending waste for disposal which cost more, The actions proposed support a drive for residents behaviour change to increase recycling performance as a means of helping to mitigate the increasing cost of waste services thus reducing the pressure on the disposal budget.

4.3 It is likely that some of the recommendations and actions in the plan can be delivered through existing resources. However, the resource implications of some of the new initiatives in the recommendations and actions in the plan will need to be assessed, quantified and considered as part of the council's Medium Term Financial Strategy before they can be implementation.

5. LEGAL COMMENTS

5.1 The Council is a waste disposal authority and a waste collection authority by virtue of the Environmental Protection Act 1990 ('the 1990

Act'). The Council's functions as a waste collection authority include an obligation to arrange for the collection of household waste and As a waste collection authority the Council. The Council, as a disposal authority, has the power to make arrangements for recycling waste.

- 5.2 Recycling and waste disposal are services supplied to all households in the borough. Increasing recycling rates and reducing contamination of recycling waste will have a financial benefit to the whole community through a reduced budget spend on waste disposal. The current cost of disposing of uncontaminated recycling waste is £17.85 per tonne compared to up to £129.05 for heavily contaminated recycling waste. Savings could potentially be diverted to other frontline services that residents rely on.
- 5.3 One of the aims of the challenge session was to look at best practice in positively influencing residents to recycle more and right. Recommendations have had regard to households who may be on low incomes as they relate to better communications and incentives rather than penalties.
- 5.4 When considering its approach to recycling and waste disposal, the Council must have due regard to the need to eliminate unlawful conduct under the Equality Act 2010, the need to advance equality of opportunity and the need to foster good relations between persons who share a protected characteristic and those who do not. A proportionate level of equality analysis is required to discharge the duty and information relevant to this is contained in the One Tower Hamlets section of the report.

6. ONE TOWER HAMLETS CONSIDERATIONS

- 6.1 Recycling and waste disposal are services supplied to all households in the borough. Increasing recycling rates and reducing contamination of recycling waste will have a financial benefit to the whole community through a reduced budget spend on waste disposal. The current cost of disposing of uncontaminated recycling waste is £17.85 per tonne compared to up to £129.05 for heavily contaminated recycling waste. Savings could potentially be diverted to other frontline services that residents rely on.
- 6.2 One of the aims of the challenge session was to look at best practice in positively influencing residents to recycle more and right. Recommendations have had regard to households who may be on low incomes as they relate to better communications and incentives rather than penalties.
- 6.3 Recommendation three is aimed at supporting residents to recycle more, and to recycle right despite any language barriers they may face.

7. BEST VALUE (BV) IMPLICATIONS

- 7.1 The recommendations in this report are made as part of the Overview & Scrutiny Committee's role in helping to secure continuous improvement for the council, as required under its Best Value duty. Improving recycling amongst local people will contribute to increased efficiency.

8. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

- 8.1 The recommendations in this report are aimed at increasing the borough's recycling rates and improving the quality of recycling waste through less contamination, and should therefore actively promote sustainable action for a greener environment.

9. RISK MANAGEMENT IMPLICATIONS

- 9.1 There are no direct risk management implications arising from the report or recommendations.

10. CRIME AND DISORDER REDUCTION IMPLICATIONS

- 10.1 There are no direct crime and disorder reduction implications arising from the report or recommendations.

APPENDIX ONE

Promoting a shared responsibility and removing barriers to improved recycling in the borough

Scrutiny Challenge Session Report.



**London Borough of Tower Hamlets
April 2016**

Chair's Foreword

Councillor Denise Jones

Chair of the review panel, Scrutiny Lead for Communities, Localities and Culture

Recycling is a topic which is continually featured in the news. Waste management is one of the few council services that affect everyone. There is a perception that Local Authorities apply unnecessary and overly bureaucratic rules when it comes to recycling which residents don't understand.

The UK is bound by legislation and targets from Europe which has set a target of 50 percent of all waste produced to be sent for recycling by 2020 and Tower Hamlets rate is significantly below this. Whilst most Local Authorities need to improve performance, Members are acutely aware of the well-researched barriers to recycling such as the high proportion of flatted properties, the level of social deprivation, and the relatively transient population, which pose a particular challenge in the borough.

In addition, stricter controls regulating the quality of waste sent to recycling materials recovery facilities means contaminated loads are hit by unnecessary charges due to additional processing required.

Overview and Scrutiny wanted to investigate what the council could do to influence residents in their recycling habits. They also wanted to understand the key national and local policy, the barriers to recycling affecting our residents, what steps the local authority has already taken, and what other opportunities are available to improve both the quantity and quality of waste sent for recycling.

I am pleased to present this report which outlines the key challenges facing the borough and makes a number of practical recommendations for the council.

Members identified a number of recommendations which focus on increasing the amount of waste sent for recycling and improving its quality by reducing contamination rates. The recommendations focus on influencing behaviour through improved communications and education, investigating the worth of incentive schemes, better joint working with landlords, and service-redesign.

I would like to thank the officers and external speakers that contributed to the challenge session, especially Simon Baxter, Interim Service Head Public Realm, Owen Whalley, Service Head Planning and Building Control; and Jackie Odunoye, Service Head Strategy, Regeneration and Sustainability. I am also grateful to my Overview and Scrutiny co-opted colleagues for their support, advice and insights and to Vicky Allen, Corporate Strategy, Policy and Performance Officer for her endless support.

Recommendations

Recommendation 1: Review the Local Reward Scheme running in the borough with a view to implementing it more widely.

Recommendation 2: Promote and coordinate visits to the Material Recovery Facility for residents and estates staff.

Recommendation 3: Promote messages about recycling to residents through ESOL sessions.

Recommendation 4: Improve communication and education campaigns by making the additional costs associated with dealing with contaminated recycling waste explicit. Include clear explanatory messages about issues such as food waste and using black bin liners.

Recommendation 5: Promote recycling messages on paper communications from the council (e.g. envelopes).

Recommendation 6: Improve the size, quality, quantity and distribution of bags provided for residents for recycling waste, for example:

- Introduce smaller bags;
- Increase the number of bags produced to meet demand; and
- Increase the number of collection points bags can be obtained

Recommendation 7: Introduce a re-balancing of general and recycling waste bins on estates in the borough

Recommendation 8: Undertake a feasibility study to assess the suitability of a range of alternative service design improvements including re-use facilities in the borough.

Recommendation 9: Promote the THHF public-realm sub group, encourage attendance and the sharing of good practice amongst Registered Providers.

Recommendation 10: Amend Local Plan policy DM14 Managing Waste to provide more explicit guidance on waste and recycling facilities.

Recommendation 11: Work with developers to incorporate innovative general waste and recycling waste management systems into the Isle of Dogs opportunity area, area planning framework where possible.

Recommendation 12: Lobby Government to require packaging industry to include standardised recyclability messages on all recyclable material.

1. Introduction

- 1.1 Waste and recycling is a key service for local authorities and dealing with waste represents a significant expense for the council at a time when funding is continually decreasing. Sending recyclable material to landfill and other waste facilities is both expensive and damaging to the environment. Reducing waste collection costs by increasing recycling rates and reducing contamination could save an estimated £500,000 which could help limit the impact of public sector cuts.
- 1.2 Whilst it is recognised that the Council is one of the best performing recyclers of dry recyclates in London it faces a particularly difficult and costly operational environment in relation to high rise food waste collection and severely limited operational opportunities to increase green waste recycling given the lack of private gardens. In addition, Notwithstanding this there was a concern that the borough's overall recycling rate is well below the London and England average, and significantly below the EU's 50 percent recycling target for the country by 2020.
- 1.3 UK waste policies operate on the basis of shared responsibility. Everyone generates some amount of waste, so everyone has a part to play in preventing unnecessary waste by recycling more.
- 1.4 Ensuring residents increase the amount of waste they recycle whilst reducing the amount of recycling that is contaminated by 'recycling right' is key to achieving the savings identified above. However there are well researched barriers to recycling faced by local authorities, relating to the housing mix and demography which creates a real challenge. Nevertheless, the council must find ways of supporting residents, landlords and landowners to become more accountable.
- 1.5 The aim of the Challenge Session was therefore to explore ways in which the council and its partners could influence residents to increase the amount of recycling and to 'recycle right'; and how landlords and landowners can work together to facilitate this.
- 1.6 The session was underpinned by three core questions;
 - a) What actions can the council and its partners take to inform residents of the importance of recycling and to encourage residents to increase the amount of recycling they do and reduce the amount that is contaminated?
 - b) How can landlords, landowners, managing agents, and developers improve recycling facilities on their estates and how can they facilitate residents to recycle more, and recycle right. And how can the council support this?
 - c) What financial opportunities can the council access to support recycling activities and what are the options to use S106 planning obligations or the Community Infrastructure Levy?

1.7 The session was chaired by Councillor Denise Jones (Scrutiny Lead Communities, Localities and Culture) on Tuesday 19th January 2016. The session took the form of a round table discussion, informed by four presentations:

- The challenges to recycling from Resource London;
- Tower Hamlets policy and practice;
- Information about the Local Green Points incentive scheme;
- Veolia, the council's waste and recycling collection provider, provided details about their education and outreach work.

1.8 Also in attendance were representatives from Registered Social Landlords (RSLs) and Developers. The session was supplemented by a visit to the Bywaters Materials Recovery Facility. Other Overview and Scrutiny Committee Members that were present at the session are:

1.9

Nozrul Mustafa	OSC Co-opted Member
Reverend James Olanipekun	OSC Co-opted Member

1.9. The session was supported by

Vicky Allen	Strategy, Policy and Performance Officer
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1.10. Evidence was received from a range of officers and experts:

Andres Taborda	Poplar Harca
Dave Bowman	Resource Recovery Client Manager, Bywaters
Gemma Scott	Local Authority Support Manager, Resource London
Graham Simmonds	Managing Director, Local Green Points
Joanna Morris	Communications, Education and Outreach Manager, Veolia
Maeve Kavanagh	Local Green Points
Nicholas Spencerley	Tower Hamlets Homes
Paul Maton	Estates Director, Ballymore Asset Management Ltd
Paul Wilson	East End Homes
Adele Maher	Strategic Planning Manager, Planning and Building Control, Tower Hamlets Council
Fiona Heyland	Head of Waste Strategy Policy and Procurement, Tower Hamlets Council
Jackie Odunoye	Service Head Strategy, Regeneration and Sustainability, Tower Hamlets Council
Liz Nelson	Interim Head Clean and Green, Tower Hamlets Council
Owen Whalley	Interim Service Head, Planning and Building Control, Tower Hamlets Council
Simon Baxter	Interim Service Head, Public Realm, Tower

	Hamlets Council
Tracey St. Hill	Principal Registered Provider Partnership Officer, Tower Hamlets Council

2. Legislative and Policy Background

European Policy

2.1 Government bodies across the European Union are bound by a set of treaty obligations and directives governing waste and recycling. The definition of recycling is set out in the EU Waste Framework Directive as:

‘any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes. It includes the reprocessing of organic material but does not include energy recovery and the reprocessing into materials that are to be used as fuels or for backfilling operations’.

2.2 The EU Directive has set specific recycling targets and requires that Member States take the necessary measures designed to achieve the following targets in relation to household waste:

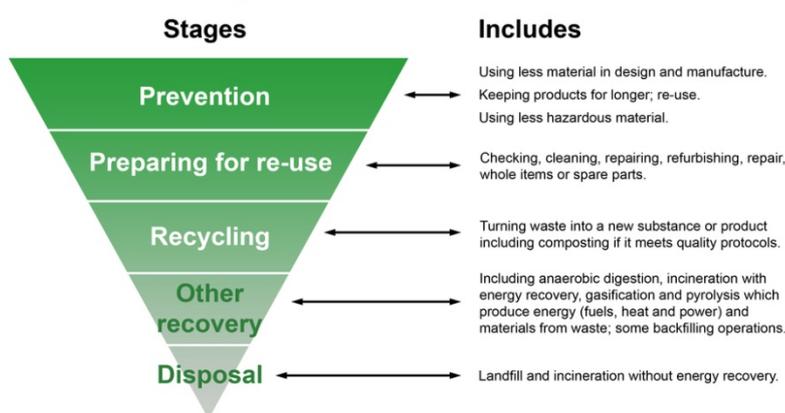
‘by 2020 the preparing for re-use and recycling of waste materials such as at least paper, metal, plastic and glass from households and possibly from other origins as far as these waste streams are similar to waste from households, shall be increased to a minimum of overall 50 percent by weight’.

2.3 A further target of 60 percent of municipal waste has been included in the EU package on the Circular Economy for 2025 and by 2030 this rises to 65 percent of municipal waste. According to a House of Commons report¹, ‘fines for non-compliance including failing to meet the recycling targets are not automatic but would follow a set process’. These targets have also been adopted nationally and regionally through the Waste Management Plan for England and the London Mayor’s Municipal Waste Management Strategy.

2.4 The Directive establishes the ‘waste hierarchy’; the identification of five waste management activities in descending order of preference. The preferred activity is waste reduction; and the least desirable is landfill disposal.

¹ Household recycling in the UK (October 2015)

The Waste Hierarchy



UK and Regional Policy

- 2.5 The Environmental Protection Act 1990 defines the structure and authority of waste management in the areas of collection, recycling and disposal. Section 45A requires a local authority to provide recycling services, placing a duty on all England waste collection authorities to collect at least two types of recyclable waste separately from other household waste. In 2015 Regulation 13 of the Waste Regulations 2012 increased the requirement for providing recycling collection services to cover the collection of paper, metal, plastic and glass materials separate from other waste and potentially in separate streams, if necessary, in order to achieve 'high quality recycling'.
- 2.6 The Review of Waste Policy in England 2011 sets out 13 commitments to moving towards a 'zero waste' economy, prioritising efforts to manage waste in line with the waste hierarchy. Required under EU law, the Waste Management Plan for England 2013 (DEFRA) brings together existing waste management policies under a single umbrella. The document sets out where the country is in terms of waste generated in England how the country manages those materials.
- 2.7 The Waste Hierarchy has been incorporated through the planning system via an update to Planning Policy Statement 10: Planning for Sustainable Waste Management. The policy provides a framework to enable waste planning authorities to work collaboratively with their communities and consider, through their Local Plans, what sort of waste facilities are needed and where they should go, while also protecting the local environment and local amenity by preventing waste facilities being placed in inappropriate locations.
- 2.8 The London Mayor's Municipal Waste Management Strategy 2011: London's Wasted Resource, outlines proposals and policies for the recovery, treatment and disposal of municipal waste for London.
- 2.9 Waste collection and disposal responsibilities amongst the London Boroughs are split between joint statutory partnerships and independent waste authorities. At present, there are four statutory

partnerships encompassing 21 London Boroughs. The boroughs of Croydon, Kingston, Merton and Sutton form a fifth voluntary partnership known as the South London Waste Partnership. The London Borough of Tower Hamlets is one of eight authorities which independently manage their waste collection and disposal obligations.

- 2.10 Since 1996 the Government has imposed a tax² on all waste sent to landfill sites. The tax was set to encourage efforts to minimise the amount of waste produced and the use of non-landfill waste management options which might include, recycling, composting and recovery. This tax is paid per tonne in addition to the gate fee charged; the current standard fee for Landfill Tax is £82.60 per tonne.

Local Context

- 2.11 As a waste authority, Tower Hamlets has a duty to collect all waste including recycling, from all residential premises (and with the exception of garden waste) free of charge. This duty does not extend to waste created at business premises for which the council provides a separate, chargeable service. It is an offence to mix business waste with household waste.

The Council's Waste and Recycling contract

- 2.12 There are currently two contracts in place that allow the council to discharge its obligations to collect household and commercial waste. One contract is the municipal waste management (cleansing) contract and the second contract is for the co-mingled dry recyclable materials and food and garden waste that is collected for composting. Both contracts are held with Veolia.

Integrated Recycling Contract

- 2.13 This contract covers the collection of co-mingled dry recyclable material from all domestic properties; the collection of food and garden waste from street level properties; and processing of food and garden waste.
- 2.14 Veolia provide a weekly collection service for a range of co-mingled dry recyclable materials from all domestic properties identified by the council. This obligation includes all domestic properties that are managed by Registered Providers including Tower Hamlets Homes. This service uses a variety of receptacles for the collections including pink recycling sacks, wheeled bins and communal bulk bins for flats and estates.
- 2.15 They also collect food and garden waste from a proportion of properties within the borough. The limited numbers of properties receiving this service are predominantly those street level properties that have gardens but the service does include a small number of flats. Food and garden waste is taken to Veolia's Greenwich depot where it is

² Finance Act 1996 (sections 39-41)

combined with green waste from other local authorities, compressed into bundles and then sent to a plant in Barking and Dagenham for processing.

Waste Treatment and Disposal

- 2.16 Tower Hamlets historically relied on landfill as the main method for disposing of its waste. However through the negotiation to extend the waste disposal contract that took place in 2012, Veolia now arrange a number of different waste disposal routes for Tower Hamlets residual waste. The waste technologies that are used include Energy from Waste (EfW) and Mechanical Biological Treatment (MBT) – the ‘other recovery’ stage of the Waste Hierarchy. These technologies are more environmentally friendly than landfill (the ‘disposal’ stage) and are also not subject to the Landfill Tax and so are more cost effective.
- 2.17 Under this contract Veolia also operate the Re-use and Recycling Centre in Yabsley Street which is open to the public seven days a week. Residents can dispose of larger items of household waste at this site.
- 2.18 The co-mingled dry recycling that is collected from households and businesses is currently sorted at a Materials Recovery Facility (MRF) operated by Bywaters (Leyton) Ltd.
- 2.19 The borough works closely with organisations such as Resource London, the Local Authority Recycling Advisory Committee (LARAC) and the GLA as well as other London boroughs, sharing best practice, benchmarking activities and information on services and on issues of collaboration, for example around procurement. In April there is a Pan-London Love Food, Hate Waste campaign launching which Tower Hamlets will be a part of.

3. Barriers to recycling

- 3.1 The House of Commons report identified a number of barriers to recycling faced by councils relating to housing mix and demography. It reported that rates tend to be lower where there are challenges with social deprivation, urban classification in the index of multiple deprivation, education and language barriers. In Tower Hamlets there are over 100 community languages spoken, and the borough is ranked highly in index of multiple deprivation.
- 3.2 Another common challenge for Local Authorities is the negative correlation between lower recycling rates and high density housing with little space for recycling receptacles. In Tower Hamlets, 86 percent of households live in flats, one of the highest proportions in London. The report also correlated lower recycling rates in areas where there is an increase in multi-occupancy dwellings, transient populations and in urban inner-city areas. Tower Hamlets has relatively high levels of

population mobility or ‘turnover’³. In 2013/14 the turnover rate was 229 per 1000 population – the 10th highest rate in England and Wales, and 8th highest in London.

- 3.3 Over the decade to 2014, the Tower Hamlets population has increased by 34.5 per cent – the largest increase of all local authority areas in England and Wales and is projected to increase equally dramatically over the next few years.
- 3.4 An OECD report ‘Greening Household Behaviour’⁴ identified household size as a key characteristic in determining waste generation; while overall larger households naturally produce more waste, the waste generated per person is usually lower in larger households. Higher education levels has also been found to be associated with lower waste generation, as well as a strong positive association between home ownership and recycling rates.
- 3.5 Resource London has identified improving the yield of dry recycling from flats as one of their main areas of work.

Recycling performance

- 3.6 Over the last six years the borough has seen a 6.5 percent increase in the percentage of household waste it sends for recycling, reuse and composting; bringing it from 26.4 percent in 2009/10 to 28.1 percent at the end of 2014/15. The rate of improvement is broadly in line with England and London but is still significantly below both the London average (33.1 percent) and the England average (42.7 percent).

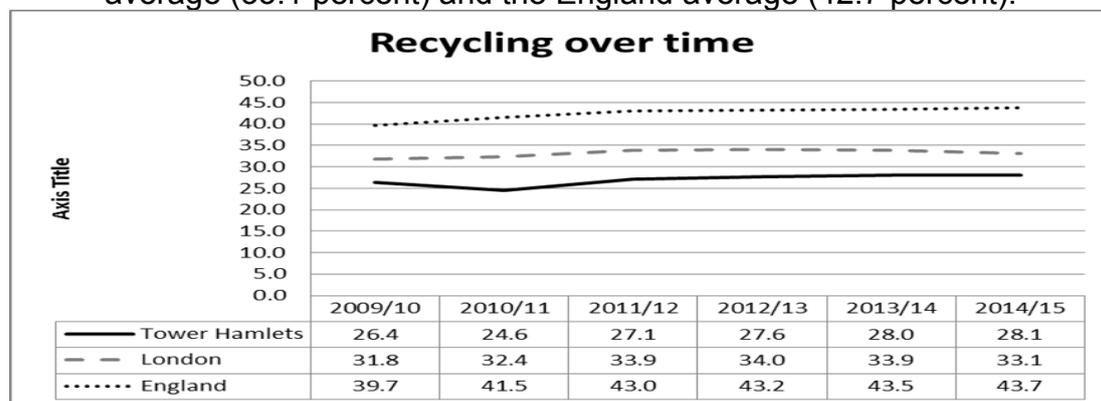


Figure 1: (source: WRAP) Recycling performance over time

- 3.7 Figure 1 above shows that performance across the country has plateaued in the last three years; with Tower Hamlets seeing just a 1.8 percent increase in recycling over this period. In London, thirteen of the 33 London local authorities have seen their recycling rates decrease two years in a row; only eight local authorities have seen an increase in performance over the past two years.

³ Population turnover rates capture the size of the population flows in and out of the borough each year, relative the size of its population.

⁴ OECD (2014), Greening Household Behaviour: overview from the 2011 survey

3.8 Department for Environment, Food and Rural Affairs (DEFRA) statistics on collected waste for 2015 show that whilst households in Tower Hamlets produced a much lower amount of waste compared to the London average (just over half), they also recycled a lower proportion (28.1 percent, against 32.8 percent for London). Of the 20,146 tonnes of household waste which was sent for recycling / composting or reuse in Tower Hamlets, 95 percent was dry recycling compared to the London average of fewer than 66 percent. The green recycling (food and garden waste) was five percent compared to the London average of 34 percent.

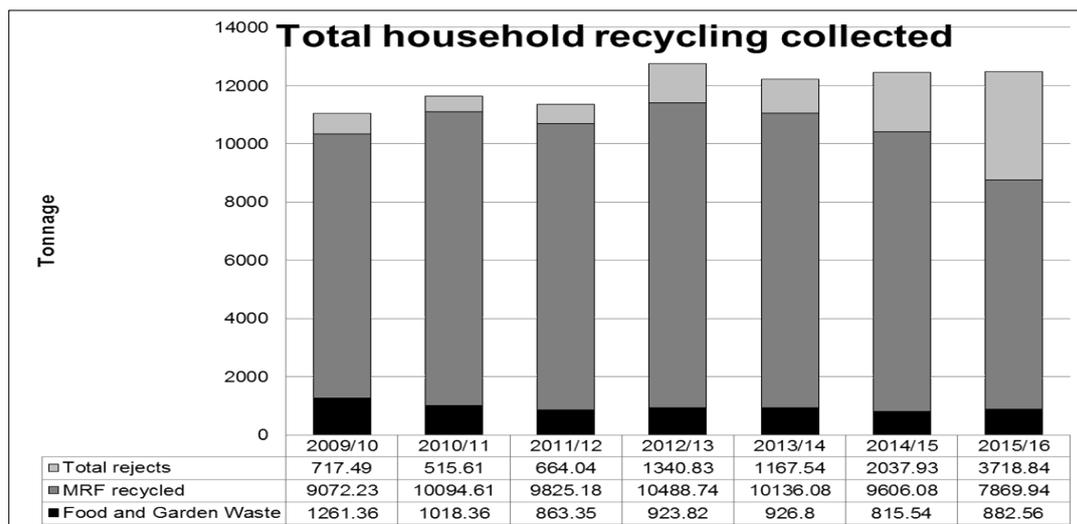


Figure 3: total household recycling waste collected

3.9 The graph above shows the total amount of recycling waste collected from Tower Hamlets households since 2009. Whilst there has been a steady increase in the total tonnage collected, the level of contamination has more than trebled in the last three years.

3.10 A major factor in the low proportion of green waste collected is attributable to the high proportion of flats in the borough. Whilst it is recognised that more can be done to improve the proportion of green recycling waste compared to dry, this report focuses mainly on dry recycling waste as this is the area where a bigger gain and impact is possible.

4. Key Findings and Recommendations

The recycling process

4.1 Recycling is the process of converting waste into a reusable material. Improving residents understanding of the recycling process is key to helping them to appreciate the importance of recycling right. To facilitate this, a visit to Bywaters, the council's contracted materials recovery facility (MRF) was arranged.

- 4.2 The Bywaters MRF processes mixed dry recycling waste into a form that can be sold on for recycling into another reusable material. It processes cardboard, mixed plastics (e.g. PET, HDPE,⁵ and film), paper, aluminium and ferrous cans, tetrapack, and glass on its 9.2 acre site in Bow. As a 'dry' MRF, food and green waste are not processed at the Bywaters site.
- 4.3 When a lorry arrives at the MRF, its load is deposited away from the general pile of recycling waste for a visual inspection so that an assessment of the level of contamination can be made. The load is also photographed so that assessments can be evidenced and negotiated if necessary because the cost of depositing the load varies depending on the level of contamination. Waste contained within black bin liners is assumed to be contaminated and classified as general waste.
- 4.4 Once this process is complete, the load is combined into a larger pile of material for the separating process to begin. The MRF separates the materials into different material types. This is done through a combination of sorting machinery and by hand. Once the materials are sorted by material type, they are baled and sold onto approved suppliers to be processed into new recycled products.
- 4.5 The sorting process begins with the removal of incorrect items. A vibrating machine separates cardboard and paper. The remaining recyclables continue onwards where steel cans are removed using magnets. Different types of plastics are identified and separated using optical scanners. Aluminium cans are separated as is glass. Smaller materials falling through a grid of 45mm² are recorded as 'fines' and are processed as 'low grade recyclates'. Finally other materials end up in a large container for waste disposal (the majority of which is energy from waste and a small percentage to landfill).
- 4.6 Incorrect items being put through the MRF have to be removed by hand. This is a time consuming job which slows down the recovery process; there is a risk that incorrect items could damage the machinery contributing to the increased fees charged. During the visit the party saw evidence of black bin bags and carrier bags getting caught up and starting to clog the cardboard and paper sorting machinery.

⁵ Polyethylene terephthalate (PET) type of plastic found in fizzy drink and water bottles and salad trays. High Density Polyethylene (HDPE) type of plastic found in milk bottles, bleach containers and most shampoo bottles.



Figure 4: Bywaters MRF paper and cardboard sorting machinery

- 4.7 There has been a drop in the value of recyclable material due to the falling price of oil and the slowdown of the Chinese economy. In addition, new legislation covering reporting by Materials Recovery Facilities on the quality of recyclable materials produced by them, are making MRF operators more vigilant about the quality of recyclable materials they receive from local authorities.

Improving recycling through incentives and charging

- 4.8 One of the objectives for this review was to explore to what extent the council and its partners could influence residents' recycling behaviours through both charging and incentive schemes.

Pay as you throw (PAYT)

- 4.9 A House of Commons briefing paper identified the UK's weaker policy levers as a barrier faced by local authorities to improving recycling rates. High performing EU states are able to use stronger incentives such as PAYT schemes where households are charged for having non-recyclable waste collected.
- 4.10 The OECD report presented findings from a household behaviour survey including attitudes to waste and recycling. The survey was conducted in 2011 and covered 12,000 households across 11 OECD countries⁶. PAYT schemes were found to be common in three of the surveyed countries: Switzerland (53 percent of households), Korea (42 percent) and Japan (35 percent). The report found that households operating under PAYT disposed of less mixed waste than those which were charged a flat rate. Where the fee was charged, the volume of general household waste reduced: in Japan the reduction was around 40 litres per week for the average household and in Switzerland, the reduction was around 36 litres. The report found that weight based billing for waste disposal generally decreased waste generation by around 20 percent however the proportion of waste recycled changed to a much lesser degree.

⁶ Australia, Canada, Chile, France, Israel, Japan, Korea, Netherlands, Spain, Sweden, Switzerland

- 4.11 Unsurprisingly, when the households surveyed ranked their support for a range of waste-reduction policies, charging for general waste collection by volume or weight was the least popular policy.
- 4.12 The Republic of Ireland (ROI) operates a kerbside PAYT system; where householders buy general waste bags or a tag to go on their wheelie bin for general waste (around €10 per bin) but recycling bags are free. However, households' expectations may be different in ROI compared to households in the UK; they may be more used to paying for services individually (doctors' appointments for example). Whether the PAYT can be deemed successful is unclear; as the most recent recycling rate for the country was 40 percent⁷, four percentage points lower than that of the UK.
- 4.13 Section 23 of the London Local Authorities Act 2007 created penalty charge provision to enable LAs to fine individuals and businesses for not complying with rules relating to waste and recycling. In 2009, under the Climate Change Act, the Labour Government trialed a scheme which gave five councils in England powers to establish PAYT pilots; households which recycled the most rubbish and left the least in their bin received a rebate while charging those who put out the most non-recycled rubbish. Electronic chips were fitted to bins to monitor and fine households which threw away too much.
- 4.14 With the introduction of the Deregulation Act 2015 LAs are still able to issue fixed penalty notices (FPN) and penalty charge notices, however it has been made more difficult and less cost-effective to do so; with the process of issuing FPNs lengthier, the fines lower and more opportunities for appeals. In addition, non-payment of a FPN is no longer a criminal offence.

Rewards and incentives

- 4.15 The England PAYT trial did not continue and in June 2011, the Coalition Government introduced a reward scheme which provides an incentive to get involved in recycling as part of the Waste Review. In introducing the fund the government said:

“it is better to reward households for doing the right thing with their waste than to penalise them for doing the wrong thing. Through the scheme, we are encouraging councils to reward people who recycle or re-use their waste”.

- 4.16 Reinforcing desired behaviour with rewards is becoming popular and in 2015 Government funding was made available by the Department for Communities and Local Government (DCLG) to run reward and recognition schemes. £6m was shared between the 46 projects chosen. Guidance produced by the DCLG indicates that rewards could include financial rewards for example vouchers, donations to charities,

⁷ Eurostat newsrelease54/2015 26 March 2015 (Eurostat, the statistical office for the European Union)

and cash or discounts on goods and services; recognition could include personalised feedback about how much a household has recycled, or a letter about how donating an item for re-use has helped the local community.

4.17 DEFRA commissioned an evaluation of the first round of its scheme⁸ which looked at the strengths and weaknesses of 8 of the 28 schemes funded. Limitations recognised in the report included difficulty in monitoring performance attributable to the schemes, the need to rely on self-reported participation and funding the scheme. However, the evaluation also highlighted that the schemes were likely to have a positive impact because they could be used to validate, reinforce and improve pre-existing behaviour rather than act as a catalyst for new behaviour. It identified six preconditions that it said should be considered for a reward and recognition scheme to be successful:

- Stable, simple, easily accessible and effective service provision;
- Clear information and strong communications tapping into different channels;
- In-depth knowledge of target audience;
- Tailored and regular recognition and feedback of service-use;
- Ability to demonstrate impact and attribution of rewards; and
- Tailored assessment and careful selection of reward delivery mechanism.

4.18 At the Challenge Session, Graham Simmonds from Local Green Points gave a presentation on their schemes. Local Green Points provides services to local authorities focused on waste and recycling, specialising in motivating harder to reach households to recycle, reuse and reduce waste. Local Green Points do this by using a combination of a strong community focus, communications and technology. Points are awarded to signed-up households for collectively achieving a reduction in waste and a corresponding increase in recycling. Points can be redeemed on a selection of purchases or donated to a local charity, depending on the set-up of the scheme. In addition to motivating households in recycling, Local Green Points promote the benefits of businesses signing up to the scheme being that a local loyalty card can support local high streets, driving more traffic to independent retailers and other businesses. There is no cost for local businesses to become part of the card scheme and they can benefit from free promotion and extra footfall.

Some examples of existing reward and incentive schemes are as follows:

4.19 **London Borough of Bexley** is an outer London borough and has the highest recycling rate in London, in 2014/15 the borough's recycling rate was 54 percent. Local Green Points is Bexley council's incentive scheme which has been running for several years to flats and estates

⁸ 'Waste Reward and Recognition Scheme: emerging findings report', Brook Lyndhurst (December 2013)

properties in the borough. The scheme started small and this year the council has received further funding to expand this to cover all street level properties and for 1,500 flats above shops. Participating households can benefit from a wide range of discounts and offers provided by retail partners on the high streets and as a thank you for recycling more, are given some Green Points which can be put towards a purchase, or be donated to one of three charity projects. Green points are loaded onto a pre-pay card on a quarterly basis; 1,000 green points equates to £3.25, the equivalent cost of an adult swim. A report by London Councils (“Helping London Recycle more”) notes Bexley has issued 1.2m green points (equating to a cash value of around £3,000, £800 of which was donated to one of the three charities).

- 4.20 Bexley reported that they had initially found it difficult to measure the success of the scheme because they had been unable to correlate the increase in recycling with the households signed up for the scheme, especially in flats within their estates. However the scheme is now seen as a success and the total tonnage of waste has been reduced.
- 4.21 **London Borough of Ealing** recycling rate was 40.1 percent at the end of 2014/15, significantly higher than Tower Hamlets. The council was awarded some money to support the borough’s current **Greendream**⁹ incentive scheme by targeting the four worst performing wards in terms of recycling, offering full value rewards such as iTunes vouchers and shopping vouchers for local shops. The full value rewards are extremely popular, however they are expensive to purchase, and as such residents are required to accumulate many more point than they would need for a traditional coupon. The full value rewards are consequently good at driving residents’ participation in all aspects of the project to enable them to collect the points required for the reward. The prize draw where residents can win points and prizes such iPads are also extremely popular.
- 4.22 The take up rate of the scheme had not been as high as anticipated and in addition, the scheme has been expensive to run. However, the scheme has only been operating for two years in Ealing and is still bedding in. The borough advised that a business case would be put forward to decide the future of the scheme.
- 4.23 **London Borough of Lambeth** recycling rate was 28.1 percent at the end of 2014/15, which is on a par with the Tower Hamlets. The Golden Ticket Recycling Draw is the scheme running in Lambeth in the 2015/16 financial year. Western Riverside Waste Authority (WRWA) launched a prize draw open to all Lambeth residents whereby households received ‘Golden Tickets’. Households fill out their contact details on the tickets and place them along with their clean, dry recycling into the recycling sack or bin for collection to be in with a

⁹ information provided by David Goodship, Ealing Council, Waste Minimisation and Recycling Officer

chance of winning a cash prize. Households can enter a ticket each time they fill a recycling sack or use their shared recycling bin.

- 4.24 Once recycling arrives at WRWA's Materials Recovery Facility for sorting, all Golden Tickets found with the correct clean and dry materials are entered into the draw. The first draw took place in October 2015 with further draws taking place up until March 2016.
- 4.25 **London Borough of Hackney's** recycling rate for 2014/15 was 25.3 percent – lower than Tower Hamlets. The Community Rewards scheme, scheduled to start in June 2016 onwards, is an incentive scheme for all households, including residents living in flats. The funding received from the DEFRA incentives fund will cover the setup costs for a specialist company to implement the scheme in partnership with Bexley and Camden and will run for three years. All three councils will focus the schemes on a Community Points Model where residents earn points on performance and choose how to spend those points from a range of products offered by the contractor via an online account; alternatively in Hackney points can be donated to community groups or charities. Once signed up, residents will be able to gain points based on recycling performance and waste minimisation behaviours specific to their ward. In Hackney, flatted properties with the highest performance will also be eligible for a monthly individual award in addition to the Community Points. Estate properties are on different rounds to the street properties – individual lorries are weighed and the round with the highest recycling is awarded the points – spread evenly between properties signed up. Hackney council intends to roll the scheme out to all households.
- 4.26 A Community Points scheme was introduced to the 65 flats of Stockholm House, on the St George's Estate in Tower Hamlets in April 2015. The scheme is a collaboration between the East End Homes and Local Green Points and without input from the council. The project has funding support from waste contractor Urbaster and performance measurement support from London Metropolitan University. It is focused on motivating residents to compost their food waste using a new community composting system, and to dispose of cooking oil correctly. Residents can also earn points for dry recycling, compete with their neighbours to compost the most to win donations for local schools and community projects.
- 4.27 There is a competitive element to the scheme with a league table for four community projects (St George Greening Project, St Paul's Primary School, Shapla Primary School, St George Seniors club). Households sign up online, creating a low-cost communications channel that people want to use and an on-line leader board informs residents how their team is doing, according to Local Green Points. Participants are encouraged to help their charity to the top of the leader board by recycling.

- 4.28 Twenty percent of homes are signed up to the scheme (a sign up rate of 15-30 percent is typical for these schemes). An awards ceremony for community prizes and personal reward has been scheduled for spring 2016 to mark the end of the pilot.
- 4.29 Analysis of the reward schemes shows that in order to achieve success, projects should be ongoing, intensive and provide consistent communication across all channels to boost engagement. In addition an educational element about raising awareness, and the competitive element combined with financial incentives, is also important.

Recommendation 1: Review the Local Reward Scheme running in the borough with a view to implementing it more widely.

Reducing contamination – education and communications

- 4.30 Reward or penalty schemes should be complemented by work to provide an understanding of why it is important to both increase the amount of waste put out for recycling and reducing the level of contamination. Contaminated (ie. non-recyclable or non-targeted) waste put out by householders for recycling can result in an increase in collection, sorting and reprocessing costs; a reduction in the quality and quantity of waste destined for recycling; and higher processing costs for local authorities.

Contamination costs

- 4.31 The cost of depositing waste for recycling at the MRF is based on both the weight of the load (tonnes) and on the level of contamination. The level of contamination is assessed via a visual inspection by the Quality Control Operator. There are three fee tiers:
- 0-5 percent contamination (tolerance level) = £17.85 per tonne (Standard gate fee or 'acceptable')
 - 6-50 percent contamination = £66.85 per tonne (Intermediate gate fee)
 - Over 50 percent contamination = £129.05 per tonne. ('unacceptable' or non-conforming / rejected loads). The council reserves the right to verify that the load rejection is appropriate prior to any further action being taken by the MRF.
- 4.32 Where the MRF is unable to accept and process a load due to the level of contamination a price is put forward for additional handling to recover the proportion of the waste that is suitable for recycling. However, Veolia staff on recycling rounds identify bins which are clearly contaminated. This visual inspection of communal recycling bins identifies amongst other things, black plastic bags which are assumed to contain general waste. These contaminated bins are tagged, dated and left for specialist contamination crews who clear the site within 72 hours. This contaminated recycling is taken to an alternative MRF

facility for processing for which the Council is charged £99.69 per tonne. Some material recovery for recycling is achieved by these contractors and any waste not suitable for recycling is sent on for energy to waste (EFW) processing; less than one percent of the borough's waste is sent to landfill.

- 4.33 The majority of the council's loads fall within the intermediate gate fee. In December 2015 there were 214 loads tipped at the MRF with a total cost excluding VAT of £54,623.80, broken down as follows:

Contamination	Tonnage	Percent of Loads at Gate Fee	Total cost for Dec (EX VAT)
0-5 percent	325.52	32.71 percent	£5,810.50
6-50 percent	730.34	67.29 percent	£48,823.30
50 percent+	0.00	0.00 percent	£0.00
TOTALS	1055.86	100.00 percent	£54,623.80

- 4.34 A monthly sample report produced by Bywaters shows the percentage of particular material types passing through the MRF; in December 2015, 20 percent of waste sent for recycling was identified as general waste which was not recyclable. Non-conformance reports are also produced on a monthly basis, highlighting other items which are on the surface of the tipped load and large enough to be removed from the load by the Quality Control Officer eg large plastic toys which can be removed as it does not contaminate the rest of the load. Bywaters may not count this towards the contamination percentage; however they will still notify the council of them. In December the most common contaminants identified on the non-conformance report were kitchen and food waste, black sacks, soil and wood. Since the introduction of the 5 pence carrier bag tax, there has been a dramatic reduction in the number of these received into the MRF.
- 4.35 Islington Council provided evidence about their ongoing problems with contamination; including dumping and general abuse of public and estate recycling sites in the borough. They reported that this had got worse since the MRFs introduced stricter controls following the introduction of new legislation and the MRF Code of Conduct last year. As a result more sites are being deliberately not emptied by crews to avoid contamination of their loads, resulting in more sites overflowing and extra resources to empty bins as waste. Various teams work on this problem: recycling teams with letters to residents, stickers and door knocking; operations with managing the collections and reporting problems; enforcement, housing and caretakers. The council is drafting a strategy to address contamination in recycling collections and support better joined up working.

Communications and education

- 4.36 Tower Hamlets communications has been recognised as good practice for a campaign it ran in 2011, ‘recycling makes sense in every language’¹⁰. Recognising the number of languages spoken in the borough, the council, Veolia, and designers Billington Cartmell, worked together to plan a high-impact campaign to communicate with all residents including non-English speaking residents. A creative campaign was developed based on translations of community languages with illustrations encouraging residents to recycle more using the strapline ‘recycling makes sense in every language’. Informal interviews with residents identified a low use of computers and smart phones, meaning that digital communications would not reach all the audience. It was decided that outdoor advertising would be visible to all residents, and carefully picked to target residents rather than commuters. Where possible, free of charge routes were used to ensure costs were kept to a minimum. The campaign routes included DLR platforms; local streets; recycling collection vehicles; selected local bus routes; park and lamppost banners; public LCD screens; posters in Idea Stores; the council’s website; and press adverts and releases including translations; local schools and events. Since 2011, recycling in Tower Hamlets has improved by one percentage point.
- 4.37 As part of their contract with the council, Veolia undertake a range of communications, advertising and outreach work. The ‘Lets Sort it / Right Stuff, Right Bin’ campaign informs residents that putting the right material in the right bin saves money by reducing contamination rates. The campaign says ‘you might think it’s just a bin but putting the wrong stuff in the wrong bin costs Tower Hamlets over £500,000 per year”.
- 4.38 The campaign was launched in November 2015 and focusses on contaminated recycling waste especially in communal bins. Since this campaign began there has been a reported 15 percent rise in the number of ‘acceptable’ loads from estates to the MRF as well as an eight percent increase in recycling tonnage. As part of the campaign a letter and leaflet was sent to all residents from the Cabinet Member for Environment with details of exactly what can be put in recycling bins, what should be put in general waste, and addressing common questions.
- 4.39 Veolia’s outreach work includes daily door knocking and speaking to residents individually about recycling. They specifically target new build properties where a ‘welcome pack’ is provided which includes pink recycling bags and leaflets explaining the recycling do’s and don’ts in the borough. Recognising the high churn in the borough, the team re-visit areas in order to reach as many residents as possible.
- 4.40 Veolia’s Education Officer works with schools; attending workshops and assemblies and setting up competitions whereby schools compete to recycle the most. The council’s recycling mascot is R3cycler is brought along to schools and community events, getting children

¹⁰ London Councils ‘Helping London recycle more best practice case studies (May 2012)

involved through influencing behaviour at an early stage and getting them to influence their parents.



Figure 5: Veolia's R3cyclor mascot

- 4.41 At the Challenge Session, Poplar HARCA provided leaflets and other promotional material about recycling they developed for their residents, providing local information and advice specific to their estates. Since the visit to the MRF, caretakers are now actively looking for black bags which have been placed into recycling waste bins, given the assumption at the MRF that black bin bags contain general rubbish. Caretakers try and identify which residents have contaminated the recycling bins, and when proof is found, residents are contacted about their responsibilities reminding them how to dispose of general waste and recycling waste correctly.
- 4.42 One of the barriers to recycling faced by residents is a lack of understanding about what happens to waste once it has been put out for recycling. The visit to the Bywaters MRF provided valuable insight into this process, and could be especially beneficial to change the perceptions of those who were sceptical about recycling.
- 4.43 During the tour of the MRF, participants heard about the education work undertaken by Bywaters; they have a newly refurbished classroom where groups of school children come and learn about the importance of recycling in a hands-on way. A pictorial diagram commissioned by Bywaters (below) covers a wall in the classroom, and depicts the journey of the material coming into the MRF and being processed into materials ready to be sold to factories for recycling.



Figure 6: Picture commissioned by Bywaters of their MRF

- 4.44 A group of team leaders, caretakers and cleaners from Poplar HARCA Estates Services Department were invited to visit the MRF. The visit consisted of a tour of the MRF, video presentation and Q&A session. HARCA feedback was very positive, staff found it engaging and it helped them to understand the wider issues of recycling and the effects of contamination. The caretakers saw first-hand the human element that goes into the process of sorting. They felt that the things they learned on the tour would help them to communicate the message to their residents, to encourage their staff to highlight issues of contamination and assist the council in its aim to tackle such issues.
- 4.45 Whilst under-18s are not able to visit the 'shop floor' for health and safety reasons, Bywaters actively encourages groups of over-18s to book a visit whereby they can walk along a viewing platform to see the MRF in action.

Recommendation 2: Promote and coordinate visits to MRF for residents and estates staff.

- 4.46 Some participants at the Challenge Session had views about the lack of civic responsibility that some residents displayed with regard to duties around general and recycling waste. There has been an increase in instances of residents putting dirty nappies and half eaten take-aways in with recycling waste. This is highly unpleasant for MRF operatives to deal with as, if they get past the visual inspection stage, operatives have to remove these items by hand. In addition, as a dry mixed recycling facility, Bywaters is not set up to deal with waste which is wet and contaminated with food or other non-recyclable waste.
- 4.47 Whilst participants agreed that selfish behavior could explain some instances, they felt that language barriers or a lack of understanding about recycling in general was also likely to be behind both poor recycling rates and contamination. In addition, the different recycling arrangements in each borough are an added confusion for residents and a particular problem for Tower Hamlets, which has a relatively high population churn. Residents may think they are complying with the council's rules by recycling in accordance to what they did in their previous authority.
- 4.48 Recognising the role education plays in changing behaviour, participants thought that incorporating key messages about recycling into the curriculum of the many ESOL courses in the borough would be a good enhancement to the existing education campaigns. As many of Veolia's communications materials are picture heavy and text light, in order to get over difficulties faced because of language barriers, it was suggested that these were used in the ESOL settings.

Recommendation 3: Promote messages about recycling to residents through ESOL sessions.

- 4.49 Highlighting the benefits of improved recycling rates and lower contamination with council finances is recognised as an important way to get across the recycling message. This method was used in Hammersmith and Fulham who identified a potential cost saving of £500,000 per year, and in Hounslow¹¹, where the link was made between increased recycling and savings on council tax.
- 4.50 Whilst the current Tower Hamlets ‘Lets sort it / Right stuff, right bin’ campaign makes the link between recycling right and cost savings, as well as identifying what can and can’t be included in recycling waste, it does not explain why. A newsletter from Australia (“What a Waste!”¹²) presents recycling FAQs in a clear and concise way. It explains the reasons behind the recycling rules, for example, why plastic bags cannot be accepted. The newsletter highlights interesting facts, which could stick in people’s minds, helping to promote the recycling message. For example:
- recycling one tonne of paper and cardboard saves 13 trees and two and a half barrels of oil; and
 - recycling one aluminium can saves enough energy to run a TV for three hours.
- 4.51 Participants at the Challenge Session all agreed that it was crucial to drive the message home to residents about using black plastic bags. If residents understand that recycling contractors equate black plastic bags with general waste and that processing them increases our waste and recycling costs, it may change habits. As black plastic bags are automatically treated as general waste, potentially many tonnes of perfectly acceptable recycling materials are consigned to general waste because residents do not understand the significance of using them.

Recommendation 4: Improve communication and education campaigns by making the additional costs associated with dealing with contaminated recycling waste explicit. Include clear explanatory messages about issues such as food waste and using black bin liners.

- 4.52 There are wide arrays of symbols (for example the Mobius loop) on packaging and paper which help people to identify what materials packaging is made from and how they can be recycled. They also identify whether they can be collected for kerbside recycling or whether the item needs to be taken to the local recycling centre.
- 4.53 Many companies are now including recycling messages on the envelopes of the correspondence they send to consumers. For example, BT are using the ‘widely recycled’ symbol along with a strapline ‘together we can reduce paper consumption’ and another

¹¹ London Assembly ‘Waste not, want not: a review of why recycling rates vary across London (Oct 2011).

¹² What a waste! Recycling, Clean up Australia Ltd, July 2009

company, cpp, use the Mobius loop symbol with the strapline 'please recycle me'.

- 4.54 The Recycle for London campaign was re-launched last year. The brand messages are aligned with local authority collection data which is updated annually. Brand guidelines were issued with the idea of all London boroughs adopting the same look and feel to their campaigns with a Recycle for London type logo – to ensure greater consistency in recycling messaging and branding across London. Tower Hamlets has adopted the Recycle Now swoosh for their recycling campaigns.



- 4.55 However, there are no recycling messages on other materials produced by the council or communications sent to residents. Bespoke messages or well-known symbols and logos about recycling on products such as envelopes can help to deliver sustainability promises and address criticisms about the proliferation of packaging and often unsolicited mail. They can also act as a reminder to consumers to 'do the right thing'.

Recommendation 5: Promote recycling messages on paper communications from the council (e.g envelopes).

Improving recycling facilities on estates

- 4.56 One of the aims of the Challenge Session was to explore how landlords could improve recycling rates on their estates by working together and introducing service re-design. There are a number of initiatives relating to service re-design being undertaken in Tower Hamlets and other boroughs from which lessons could be learned. The benefits to landlords of working together include clarity for residents, potential pooling of resources, and adopting best practice ways of working; with the aim of gaining better recycling rates across all estates.

Service re-design and improvements

- 4.57 In Tower Hamlets, pink recycling sacks are provided to residents to store and dispose of recycling waste, either in their own kerbside recycling bins or in communal bins on flatted estates. There is evidence to suggest that the current pink recycling sacks are themselves a barrier to recycling for some residents, especially for those living in flats on estates. At the Challenge Session Registered Providers reported complaints from residents about the size and quality of the bags, a lack of supply, and the amount and variety of places that they can be obtained from. Council complaint statistics show that in 2014/15 issues relating to dry recycling were the tenth most common

complaint issue, with many of the complaints relating to the pink recycling sacks.

- 4.58 The sacks are seen as being too large for many residents who often live in overcrowded conditions or with small kitchens, making the large recycling bags inconvenient. In addition, there have been complaints about the quality of the sacks which often split. These issues can be compounded for residents who struggle to take them down to the recycling bins, often having to juggle children and pushchairs.
- 4.59 There is acknowledgement from Veolia about the quality and size of the sacks and Veolia is considering alternative designs including reusable designs such as string bags. Whilst a re-usable recycling vessel would suit many residents, participants felt that this may discourage some residents from using them if they are taking down recycling on the way out. Some participants felt that smaller sacks which could be taken down more regularly and take up less space would encourage more recycling.

Recommendation 6: Improve the size, quality, quantity and distribution of bags provided for residents for recycling waste, for example:

- Introduce smaller bags;
- Increase the number of bags produced to meet demand; and
- Increase the number of collection points bags can be obtained

- 4.60 There is a need for a bin audit and re-distribution exercise as there is both an over provision of bin storage for residual waste, and an under provision of recycling bins. This is particularly true in the borough's older estates managed by RSLs. In addition, there is a higher collection frequency of general waste compared to recycling waste.
- 4.61 Peabody Housing Association provided written evidence relating to the service changes they had instigated on their estates in partnership with several London boroughs around bin re-distributions. A survey of Peabody estates in the City of Westminster identified a mismatch in the ratio of general waste and recycling facilities which was addressed on key estates by re-balancing bins to an even 50:50 split. A final round of survey and re-binning will be taking place between January–April 2016. This will also be supported by a review of collection frequencies for refuse, with a view to removing one weekly collection from key estates (there are often two/three refuse collections per week, but just one recycling collection). Evening up collection frequencies is seen as fundamental to offer an equal service for recycling if recycling performance improvements are being sought. The City of Westminster which received London Waste and Recycling Board (LWARB) funding, delivered door knocking to Westminster residents, reaching around 35

percent. With the re-binning, this resulted in recycling levels (on estates) improving from 29 percent to 36¹³ percent.

4.62 A re-balancing of waste and recycling bins also took place on the Peabody’s Pembury Estate in Hackney to a 50:50 split. Peabody caretakers delivered a letter from the Trust (as opposed to the council), informing residents of the changes to the recycling facilities and specifically asking them to recycle more of their waste. The letter used the Recycle Now iconography and communications guidelines. Peabody reported that there has been a subsequent increase in recycling rates on the estate which Peabody attributes to greater recycling capacity, increased collection frequencies and changing some bin locations.

4.63 In Tower Hamlets a bin and recycling facilities survey was commissioned with Keep Britain Tidy which audited the number of refuse and recycling bins located at blocks of flats. Across the sites surveyed there was found to be a 35 percent over provision of refuse bins and 40 percent under provision of recycling bins (when compared with our waste planning guidelines). Additionally, over 56 percent of blocks have more than a once a week collection of general waste, with some having up to 5 collections a week.

4.64 An example of this inadequate recycling provision and an excess of refuse bins is shown below. The graph shows that Arbour House has more than 240 litres (the size of a large wheeled bin) per household for general waste but less than 50 litres per household for recycling.

Arbour House, 61 properties



4.65 Aligning existing blocks and estates to the Council’s current waste planning guidelines and new builds will provide residents with more opportunity to recycle and encourage behaviour change and greater participation.

Recommendation 7: Introduce a re-balancing of general and recycling waste bins on estates in the borough.

4.66 There are several innovative examples of service re-design improvement work being undertaken by other LAs and RPs. For example, as part of the estate work, Peabody and City of Westminster will be providing some transparent estate bins so that residents can see inside the bins. The aim of the exercise is to reduce contamination; if everyone can see what has been placed in the recycling bin; residents are less likely to throw general waste in. The transparent

¹³ Figures provided by Peabody Estates January 2016

bins also help caretakers identify potential contamination, for example black sacks.

- 4.67 Some councils have re-sited their recycling bins which has minimised waste contamination by pedestrians and this had resulted in reduced cross-contamination rates. Another initiative reported by LWRB¹⁴ was a link between signage improvements and increased recycling rates (especially when accompanied with reusable bags to take the recycling to deposit). Wandsworth council's Signs of Improvement scheme¹⁵ improved signage at the point where residents dispose of their rubbish on estates (refuse chute loading hoppers and chamber doors), resulted in improved recycling rates as well as improving the areas to make disposal a more pleasant chore.
- 4.68 Islington council are currently considering physically restricting the opening of recycling bins by installing 'forest locks' on certain communal bins. This would restrict the ability of residents to throw large bags of waste into them; residents would have to post items through the limited opening space.
- 4.69 In addition, in order to create efficiencies and cut the cost of waste collection, Islington council have started using the Enevo One system. The system uses smart wireless sensors on bins which measure fill level data. This system aims to streamline the collection route by visiting bins which are actually full rather than the traditional fixed schedule collection method.

Re-use facilities

- 4.70 On the Pembury Estate in Hackney which is managed by Peabody, a bulky waste reuse programme called 'The Loop' has been established as part of the estate's commitment towards re-use of waste. The scheme is in its early days, but has already delivered a successful chair refurbishment workshop, recruited a volunteer to make things from recovered wood, held several furniture sale days, and has identified premises to create a storage area and show room. The work with Groundwork was initiated by Groundwork London, and is backed by EU Life+ funding. Peabody is contributing £60,000 over three years to match fund it. In City of Westminster, textile and Waste electrical and electronic equipment (WEEE) recycling banks are being provided on Peabody estates in order to divert bulky waste into reuse or recycling operations.
- 4.71 Access to cars is relatively low in the borough, and new build estates are often being designed to dissuade car usage. Therefore access to the re-use and recycling centre at Yabsley Street to dispose of items such as bulky waste and clothes is limited. Ballymore reported that although residents can contact the council to arrange bulky waste

¹⁴ LWRB 'Flats recycling programme evaluation report' (Aug 2013)

¹⁵ London Councils 'helping London recycle more best practice case studies'

disposal, residents often tended to put these items out for general waste as an easy option. Ballymore use Mears repairs to collect the bulky waste that end up in the bin rooms on their estates. Where feasible the bulky waste items are taken to a re-use scheme for repair and selling on.

- 4.72 Islington council work with London Re-use Network to provide a free re-use collection service for Islington residents. The items are taken to 'Bright Sparks' where volunteers and trainees check the items for safety and carry out minor repairs. Unwanted furniture and some electrical items are then sold at affordable prices to members of the public and passed on to people less fortunate through the Bright Sparks shop.

Recommendation 8: Undertake a feasibility study to assess the suitability of a range of alternative service design improvements including re-use facilities in the borough.

Coordinated working

- 4.73 The Tower Hamlets Housing Forum (THHF) is a partnership between Registered Providers (RPs) and the council to deliver the housing vision for the borough. Its Public Realm sub-group meets every two months and focuses on initiatives that improve maintenance, cleanliness and health and safety of public areas on housing estates. Past attendance by officers from Public Realm has been sporadic, however this issue is being addressed and the service is now committed to attending the meetings. Engagement by the RPs is mixed and several of the national RPs with smaller housing portfolio in the borough does not attend the meetings.
- 4.74 It was reported that many RPs see waste and recycling management as the council's duty. A particular focus for the council's Clean and Green Team was tackling this perception, ensuring RPs as estate owners take appropriate responsibility.
- 4.75 The THHF Executive Action Plan highlights the development and implementation of a resident awareness campaign on recycling and bulk rubbish disposal as a key activity. A caretakers event has been arranged for March 2016 to start to address this issue, with key activities being to ascertain what THHF public realm group members already have in place and develop agreed messages.
- 4.76 It was reported that Bywaters will be presenting at the next meeting where an invite to visit the MRF will be extended to all THHF Public Realm sub-group members.
- 4.77 The service reported that the estates which have better recycling rates and fewer bins which were contaminated are those where management was more interested in recycling and other public realm issues.

Participants at the Challenge Session agreed that using the THHF public-realm sub-group forum to identify and disseminate good practice, such as that identified above, to gain improved recycling rates across all estates, was a good idea.

Recommendation 9: Promote the THHF public-realm sub group, encourage attendance and the sharing of good practice amongst Registered Providers.

Influencing improvements through Planning Policy

- 4.78 One of the aims of the Challenge Session was to understand how developers could improve recycling facilities on estates; and whether there was any scope for using Section 106 (S.106) planning obligations or the Community Infrastructure Levy (CIL).
- 4.79 Government policy on the application and use of Planning Obligations is contained within the CIL Regulations 2010 (as amended), the National Planning Policy Framework (NPPF), and the National Planning Practice Guidance (NPPG).
- 4.80 S.106 funding is negotiated with developers and used to support the impact of the development on the surrounding neighbourhood, and CIL places a levy on any planning to be used towards infrastructure. The Core Strategy sets out the council's priorities for planning obligations on its Regulation 123 list of infrastructure projects which are currently: affordable housing, sustainable transport, open space, education, health, training employment and enterprise, biodiversity, community facilities, highway work and public realm. 'Community Facilities' are identified in the council's Revised Planning Obligations Supplementary Planning document as multi-use community facilities, faith centres, youth centres, idea stores and libraries, archives and leisure facilities.
- 4.81 Planning Obligations need to meet the following tests:
(a) necessary to make the development acceptable in planning terms;
(b) directly related to the development; and
(c) fairly and reasonably related in scale and kind to the development.
- 4.82 As new developments are required to make proper provision for waste and recycling facilities, there is limited scope to use these funding streams for the provision of or improving community recycling facilities.
- 4.83 The National Planning Policy for Waste (2014) highlights that plans for new housing developments should ensure the design and layout of new residential and commercial development and other infrastructure complements sustainable waste management, including the provision of appropriate storage and segregation facilities to facilitate high quality collections of waste. This requirement is interpreted through the council's core strategy spatial policy 14.

- 4.84 Architects and developers are obliged to make provision for waste to be stored and collected in a manner that maximises opportunities for recycling. Consideration should be given to the design of buildings and the procedures that will be required to ensure that those who inhabit and service the building can manage the waste produced in that building in a sustainable manner.
- 4.85 The London Waste and Recycling Board (LWARB) has recently produced a good practice template recycling and waste management strategy for new build flats in London for Local Authorities to adopt. Accompanying this is their waste management planning advice for flatted properties, which has sections for developers to complete and submit with planning applicants.
- 4.86 The guidance states that in order to facilitate recycling, to meet London Plan waste management targets, while protecting visual and residential amenity and public health, proposals for flatted residential development should include detailed consideration of waste arising from the occupation of the development including consideration of how waste will be stored, collected and managed including¹⁶:
- There is adequate temporary storage space within each flat / apartment for waste generated by that flat / apartment allowing for the separate storage of recyclable materials;
 - There is adequate communal storage for waste, including separate recyclables, pending its collection;
 - Storage and collection systems for waste are of high quality design and are incorporated in a manner which will ensure there is adequate and convenient access for all residents and waste collection operatives and will contribute to the achievement of the London Plan waste management targets;
 - Measures are incorporated to manage impact caused by odour, noise and dust; and
 - Onsite-treatment of waste has been considered.
- 4.87 The council's Development Management guidance relating to Waste Management (DM14) states that a 'development should demonstrate how it will provide appropriate storage facilities for residential waste and recycling as a component element to implement the waste management hierarchy of reduce, reuse and recycle'. The accompanying waste standards suggest minimum capacity for general waste, dry recyclable waste, and compostable waste; the suggested minimum capacity per week (litres) is unbalanced with general waste almost double that of dry recyclable waste.
- 4.88 Assessment of waste and recycling facilities is provided by the council's public realm development team as part of the planning application process. The team comments on how appropriately the waste management and recycling facilities have been addressed

¹⁶ London Waste and Recycling Board and London Environment Directors' Network, January 2015

- 4.89 Whilst national policy does not provide specific detail for developers to adhere to, as part of the Local Plan preparation there is scope for the council's guidance in DM14 on managing waste to be updated based on a new Waste Management Strategy. One of the main aims of this study is to help the council to develop options for efficiently managing waste collection in high density development, including looking into new technology. The LWARB template recycling and waste management strategy could be used as a guide for this process.

Recommendation 10: Amend Local Plan policy DM14 Managing Waste to provide more explicit guidance on waste and recycling facilities.

- 4.90 The intensity of development in the borough, especially in the Isle of Dogs Opportunity Area, where 60-70 storey apartment blocks are being built, supports the need for innovative ways of dealing with waste and recycling need in order to deal with the sheer amount of waste and recycling facilities needed to service such large high rises.
- 4.91 As part of its recycling and waste management strategy template, LWARB produced case studies detailing the innovative ways in which developers in conjunction with local authorities have gone about tackling waste management and recycling in new flatted developments.
- 4.92 In Wembley City development, Brent, the Envac system has been installed for the collection of general waste and recycling waste for phase 1 of the residential development. Envac is a stationary, underground vacuum system with overground deposit 'portals' located outside buildings at ground level throughout the development. The waste collected is residual, food/organic waste, dry recyclables and cardboard. The benefits of the Envac system are reported as being more pleasant to use; a tidier environment, less smelly, and less likely to attract any pests. As waste is transported and stored on the development but away from residential buildings, waste collection is less invasive and often less frequent. The development achieves a 45 percent recycling rate from household waste produced by residents.
- 4.93 Brent council does not collect any household waste from the development which is dealt with by the Envac system, however because of its statutory duty to collect waste, the council makes a contribution towards the cost of collection and management by a private provider. For future development phases, Wembley City developers are not committed to using the Envac system, partly due to cost of installation.
- 4.94 At St. George's Wharf Tower, in Lambeth, the waste management system is a set of pull-out waste bins with four compartments for general and recyclable waste provided within each kitchen. In addition, accessed through a small facilities room on each floor, is a chute

system with the ability to separate waste into two factions: general waste and recycling waste. To operate the chutes, residents press one of the two buttons on the wall panel to select either general waste or recycling. Once the 'open door' light on the wall panel is illuminated, the chute door can be opened and materials can be placed in the chute. General waste is compressed to make better use of space. Whilst the development is not fully occupied, Lambeth council have identified the potential to divert over 46 percent of dry recyclable waste away from disposal.

- 4.95 Ballymore Asset Management Ltd who attended the Challenge Session reported that a number of landlord developers would be interested in coming together to look at alternative options of general and recycling waste management. The role for the council would be to provide coordination and potentially funding to support a system.

Recommendation 11: Work with developers to incorporate innovative general waste and recycling waste management systems into the Isle of Dogs opportunity area, area planning framework where possible.

Influencing improvements through Lobbying

- 4.96 WRAP launched the On-Pack Recycling Label (OPRL) scheme in 2009 in response to research that identified a need to communicate better with consumers about what types of packaging can be recycled. The scheme has been developed for retailers and brand owners by the British Retail Consortium (BRC) in partnership with WRAP.
- 4.97 Under the scheme, labelling on packaging includes 'widely recycled', 'check local recycling' and 'not currently recycled'. The WRAP website identifies that over 145 organisations are signed up to the scheme over thousands of product lines.
- 4.98 Considering the low levels of recycling in the country as a whole, and the need to meet EU targets, central Government could play a more active role in encouraging residents in their recycling habits by requiring industries to include recyclability messages on their products and packaging in a clearly recognised and consistent format.
- 4.99 A move to standardisation of materials used in packaging would also help households to know what can and cannot be recycled.

Recommendation 12: Lobby Government to require packaging industry to include standardised recyclability messages on all recyclable material.

Glossary

Composting: the process of breaking down organic rubbish, such as garden and food rubbish, into a material which can be added to the garden to help plants grow.

Energy recovery from waste (EfW): the burning of rubbish to produce energy (heat) which is used to generate electricity or to heat homes.

General waste: also called residual **waste**, is material from businesses and households that cannot be recycled. It includes materials such as non-recyclable plastics, polythene, some packaging and kitchen scraps, etc.

Household waste: this includes rubbish thrown in bins at home and collected by the local council. Also, litter collection and street sweepings, garden rubbish, rubbish from civic amenity sites and rubbish collected for recycling or composting.

Kerbside collection: any regular collection of rubbish for recycling (also called recyclables). This may be from businesses or households. You may have a box for recyclables, which is collected each week from outside your house.

Landfill site: usually a large hole in the ground, such as an old quarry or mine. Can also be an area where rubbish is piled above ground and covered, creating a hill, which will be covered in grass, a process known as landraising.

Materials recovery facility (MRF): a place where materials for recycling are taken for sorting into material types before delivering to reprocessors (companies who recycle).

Recycling: the process of changing rubbish into either the same product or a different one. It involves some kind of industrial process. For example, using old plastic bottles to make new ones.

Reduction: this involves using fewer materials so less rubbish is created. For example, many glass bottle makers now use less glass to make a bottle than they did 10 years ago. This means that less glass rubbish is created when we throw the bottles away.

Residual waste: the material that remains after the process of **waste** treatment has taken place. Such treatment can include agricultural, industrial and mining. It can also be applied in a more domestic sense, referring to the household rubbish not able to be recycled, re-used or composted.

Reuse: the act of using an item more than once. For example, many supermarkets now have carrier bags which you can use over and over again, and some businesses deliver goods in reusable plastic crates.

Waste: this is the same as 'rubbish'. It is a wide-ranging term, which includes most unwanted materials.

Waste collection authority: the part of the local council which collects rubbish.

Common recycling logos and symbols

OLRP – On-pack Recycling Label symbols

Widely recycled



75 percent or more of councils provide household recycling collection facilities for that packaging type in their area.

Check local recycling



Used when 20-75 percent of councils have household recycling collection facilities for that packaging type in their area.

Not currently recycled



Used when less than 20 percent of councils have household recycling collection facilities for that packaging type in their area.

Widely recycled at recycling points: Check



locally for kerbside Recycling provision exists in over 75 percent of councils (including both household recycling collections and at recycling centres). A household recycling collection exists in less than 75 percent of councils.

Plastic films

Some plastic films can also now be recycled at supermarket's carrier bag collection points. Look out for the 'Recycle with carrier bags at large stores - not at kerbside' message on your bread bag, breakfast cereal, toilet and kitchen roll wraps, grocery produce, multipack shrink wrap and newspaper and magazine wraps.



Metal paint cans



Empty metal paint cans are accepted for recycling at most local authority recycling centres. Check your council's website for more information.

Other logos and labelling

Mobius Loop



Indicates that an object is capable of being recycled - not that the object has been recycled or will be accepted in all recycling collection systems. Sometimes this

symbol is used with a percentage figure in the middle to explain that the packaging contains xpercent of recycled material

The Green Dot



The Green Dot **does not necessarily mean that the packaging is recyclable**, will be recycled, or has been recycled. It is a symbol used on packaging in many

European countries and signifies that the producer has made a financial contribution towards the recovery and recycling of packaging

Glass



Please dispose of glass bottles and jars in a bottle bank

Recyclable steel

The product is made of recyclable steel



Compostable

The 'seedling' is the registered trademark of European Bioplastics. Products certified to be industrially compostable according to the European

standard EN 13432/14955 may bear the 'seedling' logo

Tidyman



Dispose of this carefully and thoughtfully. Do not litter. This doesn't relate to recycling, but is a reminder to be a good citizen, disposing of the item in the most appropriate manner



PET

Plastics

Identifies the type of plastic resin used to make the item by providing a 'Resin Identification Code'. It is represented with a 'chasing arrows' symbol surrounding a number

between 1 and 7 that defines the resin used

Recyclable aluminium



The item is made of recyclable aluminium

Waste electrical



Waste electrical items - from household appliances to mobile phones to IT equipment

Paper



To be given the National Association of Paper Merchants' mark, paper or board must be made from a minimum of 50 percent, 75 percent or 100 percent

genuine waste paper and/or board fibre, no part of which should contain mill produced waste fibre

Wood



The Forest Stewardship Council (FSC) logo identifies products which contain wood from well managed forests independently certified in accordance with the rules of

the FSC.

Action	Responsibility	Date
Recommendation 1: Review the Local Reward Scheme running in the borough with a view to implementing it more widely		
<p>Comment from service: A decision to implement a reward scheme across the Borough cannot be taken in isolation from other policy decisions on waste. An options review of potential approaches to reward that can be effectively monitored (the main challenge with reward schemes) will be completed by the summer. The Executive Mayor in Cabinet will consider this as part of a comprehensive strategic review of the Council's waste policies when making his decision on how to proceed.</p>		
An options review of potential approaches to reward that can be effectively monitored (the main challenge with reward schemes) will be completed by the summer for the Mayor in Cabinet.	Roy Ormsby / Liz Nelson, CLC	End of June 2016
Recommendation 2: Promote and coordinate visits to the Material Recovery Facility for residents and estates staff		
<p>Comment from service: The service is already doing this and a number of visits have taken place, including with RPs and Members.</p>		
Send out next round of invitations to Landlords and monitor demand	Roy Ormsby / Liz Nelson, CLC	September 2016
Support the organisation of regular visits to the MRF, and promote through social media, housing associations, website, press release and other communications channels	Liz Nelson, CLC Communications, LPG	Ongoing

Action	Responsibility	Date
Invite Members and the Mayor to a specific visit to the MRF and arrange for trade and local media coverage for free publicity	Liz Nelson, CLC Communications, LPG	March 2017
Recommendation 3: Promote messages about recycling to residents through ESOL sessions		
Veolia Education and Outreach team to devise a programme with Cultural Services that can integrate this messaging in to ESOL classes.	Roy Ormsby / Shazia Hussain, CLC	Sept 2016
Recycling elements will be in place in schemes of work for new ESOL programmes starting in September	Shazia Hussain, CLC	Sept 2016

Action	Responsibility	Date
<p>Recommendation 4: Improve communication and education campaigns by making the additional costs associated with dealing with contaminated recycling waste explicit. Include clear explanatory messages about issues such as food waste and using black bin liners.</p>		
<p>Comment from service: The team launched a recycling campaign in November 2015. Titled 'Let's sort it!' it featured local residents promoting the use of the correct bin for recycling and highlighted the cost of placing food waste, blacks sacks and other non-recyclable items in the purple recycling bins. The 'Let's sort it!' campaign was on bus shelters, billboards and on recycling vehicle sides. A detailed and pictorial leaflet was delivered to flatted properties and adverts have been in East End Life. The campaign was also supported by regular twitter feeds. This campaign is on-going and the campaign artwork and messages will continue throughout the year. It is hoped that the cost references associated with dealing with contaminated waste can be included in the next Council Tax leaflet. Where advice from communications indicates the appropriateness of the cost reference to securing engagement this will be included as a campaign reference where the opportunity arises.</p>		
<p>Reference the costs associated with dealing with Contaminated waste in the next Council Tax leaflet.</p>	<p>Roy Ormsby / Liz Nelson, CLC</p>	<p>January 2017</p>
<p>Where advice from communications indicates the appropriateness of the cost reference to securing engagement this will be included as a campaign reference where the opportunity arises.</p>	<p>Roy Ormsby / Liz Nelson, CLC</p>	<p>Ongoing</p>
<p>Review the existing suite of marketing materials to simplify content to ensure it is consistent, easy to understand and aligned with recommendations</p>	<p>Communications, LPG</p>	<p>March 2017</p>

Action	Responsibility	Date
Regular feature in Bengali news to promote recycling amongst BME communities	Communications, LPG	Ongoing
Regular feature in council publications such as the new quarterly magazine to promote recycling including key statistics and facts including costs	Communications, LPG	Ongoing
Recommendation 5: Promote recycling messages on paper communications from the council (e.g. envelopes)		
Comment from service: The small cost associated with franking will be met within existing budgets.		
The council's franking machine will be changed to incorporate a recycling message.	Fiona Bowman (Interim Head of Facilities Management), D&R	September 2016

Action	Responsibility	Date
<p>Recommendation 6: Improve the size, quality, quantity and distribution of bags provided for residents for recycling waste, for example:</p> <ul style="list-style-type: none"> • Introduce smaller bags; • Increase the number of bags produced to meet demand; and • Increase the number of collection points bags can be obtained 		
<p>This needs to form part of a wider review of containerisation for the future and ensure it meets the needs of waste reduction, recycling, avoidance and re-use in the future</p>	<p>Roy Ormsby / Liz Nelson, CLC</p>	<p>March 2017</p>
<p>The team, working with Veolia Communications, Education and Outreach, will be piloting the use of reusable recycling bags on a number of blocks. This is a small scale pilot targeting around 400 residents using two different sizes of bags. Residents will be engaged and feedback sought to help determine whether this is a viable option for the future.</p>	<p>Roy Ormsby / Liz Nelson, CLC</p>	<p>March 2017</p>

Action	Responsibility	Date
Recommendation 7: Introduce a re-balancing of general and recycling waste bins on estates in the borough		
<p>Comment from service: This needs to form part of a wider review of containerisation for the future and ensure it meets the needs of waste reduction, recycling, avoidance and re-use in the long-term. This is not a decision that can be made in isolation from wider strategic waste policy decisions. This will be considered by the Executive in the context of the council’s waste policy review linked to the procurement strategy for waste services.</p>		
Include re-balancing in the wider review of containerisation which will be undertaken as part of the review.	Roy Ormsby / Liz Nelson, CLC	March 2017
Including re-balancing as part of the procurement strategy for waste services	Roy Ormsby / Liz Nelson, CLC	March 2017

Action	Responsibility	Date
<p>Recommendation 8: Undertake a feasibility study to assess the suitability of a range of alternative service design improvements including re-use facilities in the borough.</p>		
<p>Comment from service: Assessment of the effectiveness of current service design is already underway as part of the strategic review of the Waste Service. It is likely to involve a major review of waste capacity provision and must take into account future waste, population and contractual needs. Much of the critical infrastructure supporting effective waste and recycling is not owned or controlled or designed by the Council or its contractors. The review of waste service will consider how the Council can encourage developers and landlords to adopt more effective and consistent approaches to waste containment and recycling. This is unlikely to take the form of a feasibility study and is more likely to engage policy, relationship management, partnership development and planning guidance issues.</p>		
<p>Incorporate assessing the suitability of a range of alternative service design improvements as part of the strategic review of waste services.</p>	<p>Roy Ormsby, CLC</p>	<p>March 2017</p>
<p>Evaluate the new forms of bin (lockable and caged) currently being piloted</p>	<p>Roy Ormsby / Liz Nelson, CLC</p>	<p>September 2016</p>

Action	Responsibility	Date
<p>Recommendation 9: Promote the THHF public-realm sub group, encourage attendance and the sharing of good practice amongst Registered Providers.</p>		
<p>Comment from service: The Mayor has recently met with the Local Strategic Partnership Executive to agree a programme to remodel and re-launch it. THHF have been clear about their ongoing support for the Local Strategic Partnership and see the THHF public Realm sub group as an important part of the Partnership Infrastructure.</p>		
<p>Promote the THHF public-realm sub group via the THHF website – particularly when any major events such as the Caretakers conference happen.</p>	<p>Tracey St Hill, D&R</p>	<p>March 2017</p>
<p>Ensure at least 4 Public Realm sub-group meetings occur each year</p>	<p>Tracey St Hill / Chair of sub-group, D&R</p>	<p>December 2016</p>
<p>Ensure that recycling good practice is shared among the RPs attending the Public Realm sub-group</p>	<p>Tracey St Hill / Chair of sub-group, D&R</p>	<p>Ongoing</p>
<p>Encourage RPs to work with the Council to promote recycling targets within their respective organisations</p>	<p>Tracey St Hill, D&R / Roy Ormsby, CLC / Chair of sub-group</p>	<p>Ongoing</p>
<p>The Mayor will be meeting with representatives of Borough RPs later this year to address key environmental issues including waste management and recycling.</p>	<p>Corporate Director CLC / Robin Beattie, CLC</p>	<p>TBC</p>

<p>The Partnership Executive Board will define the partnership priorities at a meeting in June but have already indicated that environmental management issues will be important to them.</p>	<p>Robin Beattie, CLC</p>	<p>June 2016</p>
<p>Working with colleagues to raise the profile of the THHF public realm sub-group through regular coverage of the successes and achievements of the group via 'real stories' and case studies. (Promoted via managers' bulletin, TH Now, Intranet etc)</p>	<p>Communications, LPG</p>	<p>Ongoing</p>
<p>Recommendation 10: Amend Local Plan policy DM14 Managing Waste to provide more explicit guidance on waste and recycling facilities.</p>		
<p>Comment from service: DM14 encourages the development industry to demonstrate how a proposal will help minimise waste and maximise recycling. As part of the Local Plan preparation, there is a scope for this policy to be updated based on a new Waste Management Strategy, which has been commissioned by the Plan Making team with support from the council's Waste team. One of the main aims of this study is to help the council to develop options for efficiently managing waste collection in high density development, including looking into new technology. However, all the policy requirements set out in the new Local Plan is subject to a viability assessment. This is to ensure that the Plan is deliverable. In addition, it is for the Waste Team to further advise the Plan Making team whether or not a supplementary guidance will be a more effective tool to respond to the growing needs in waste.</p> <p>The use of S106/CIL to help improve recycling facilities on estates is currently reviewed by Infrastructure Planning Team through its Draft Revised Planning Obligations SPD and Regulation 123 List. These two documents will be submitted to Cabinet for public consultation in April 2016.</p>		
<p>Consult on the Local Plan Waste Evidence base</p>	<p>Owen Whalley / Adele Maher, D&R</p>	<p>November – December 2016</p>
<p>Consult on the Local Plan Waste Policy</p>	<p>Owen Whalley / Adele Maher, D&R</p>	<p>November – December 2016</p>
<p>Consult on the Revised Regulations 123 List and Planning Obligations SPD</p>	<p>Owen Whalley / Adele Maher, D&R</p>	<p>April – June 2016</p>

Recommendation 11: Work with developers to incorporate innovative general waste and recycling waste management systems into the Isle of Dogs opportunity area, area planning framework where possible.

Comment from service: The Council is working in partnership with the GLA on the Isle of Dogs Opportunity Area Plan Framework (OAPF) and in other regeneration initiative areas such as the Housing Zone and in Whitechapel. The Mayor and the Lead Member for Strategic Development are both sitting on the Strategic Board to influence the direction of travel of the project. The overall infrastructure provision to support the level of growth planned for is a major concern which the council shares with the GLA. The Plan Making team will link in with Infrastructure Planning team to continue to raise this with the GLA to ensure on-going discussions with developers in respect of infrastructure provision, including incorporating innovative general waste and recycling waste management systems into the area.

Influence the content of the GLA's draft OAPF document	Owen Whalley / Adele Maher, D&R	August 2016
Respond to public consultation of the Draft OAPF document	Owen Whalley / Adele Maher, D&R	September 2016

Recommendation 12: Lobby Government to require packaging industry to include standardised recyclability messages on all recyclable material.

Comment from service: In London, we have got the London Waste and Recycling Board (<http://www.lwarb.gov.uk/what-we-do/>), which can be considered as a useful group to help lobby the government on this matter. Lobbying government for policy change is a political responsibility. Officers can provide the relevant technical context for specific arguments and can respond to requests by government for technical observations on proposed changes to policy or law. It would be inappropriate to task officers with the responsibility to actively lobby government directly for policy change.

<p>Cabinet</p> <p>6th September 2016</p>	 <p>TOWER HAMLETS</p>
<p>Report of: Zena Cooke, Corporate Director of Resources</p>	<p>Classification: Unrestricted</p>
<p>Corporate Directors' Decisions</p>	

Lead Member	Councillor David Edgar, Cabinet Member for Resources
Originating Officer(s)	Alimul Kadir, Accountant - Financial Planning
Wards affected	All wards
Key Decision?	No
Community Plan Theme	One Tower Hamlets

Executive Summary

This report sets out Corporate Directors' decisions under Financial Regulation B10 which stipulates that such decisions be the subject of a noting report to Cabinet if they involve expenditure between £100,000 and £250,000.

Recommendations:

The Mayor in Cabinet is recommended to:

1. Note the Corporate Directors' decisions set out in Appendix 1.

1. REASONS FOR THE DECISIONS

- 1.1 Financial Regulations require that regular reports be submitted to Cabinet setting out financial decisions taken under Financial Regulation B10.
- 1.2 The regular reporting of Corporate Directors' Decisions should assist in ensuring that Members are able to scrutinise officer decisions.

2. ALTERNATIVE OPTIONS

- 2.1 The Council is bound by its Financial Regulations (which have been approved by Council) to report to Cabinet setting out financial decisions taken under Financial Regulation B10.
- 2.2 If the Council were to deviate from those requirements, there would need to be a good reason for doing so. It is not considered that there is any such reason, having regard to the need to ensure that Members are kept informed

about decisions made under the delegated authority threshold and to ensure that these activities are in accordance with Financial Regulations.

3. DETAILS OF REPORT

3.1 Financial Regulation B10 sets out the Cabinet Reporting Thresholds for the following financial transactions:

- Virements
- Capital Estimates
- Waiving Competition Requirements for Contracts and Orders (Subject to EU threshold)
- Capital Overspends
- Settlement Of Uninsured Claims

3.2 Under Financial Regulation B10, if the transaction involves a sum between £100,000 and £250,000 it can be authorised by the Corporate Director under the scheme of delegation but must also be the subject of a noting report to the next available Cabinet.

3.3 There have been three new Corporate Directors' Decisions between £100,000 and £250,000 since the last report on 26th July 2016. The details of these are provided within Appendix 1.

4. COMMENTS OF THE CHIEF FINANCE OFFICER

4.1 The comments of the Chief Financial Officer have been incorporated into the report and Appendix.

5. LEGAL COMMENTS

5.1 The report sets out individual Corporate Directors' Decisions for noting by Cabinet, as required by Financial Regulation B10.

5.2 Internal guidelines have been published setting out the process by which Records of Corporate Directors' Decisions are completed. These specify that the proposed decision must be in accordance with the Council's Financial Regulations and its Procurement Procedures. There are limited circumstances in which a waiver of the Procurement Procedures is permissible and the guidelines reinforce that waivers should not be sought as a substitute for proper planning.

5.3 Each director's decision requires prior authorisation by the relevant service head, the responsible procurement officer, the directorate finance manager, and the chief legal officer before agreement by the corporate director. A template form is completed to record each director's decision and these Records of Corporate Directors' Decisions (RCDDs) must be maintained by each directorate. The legal implications of each of the individual decisions are provided as part of the decision making process and are recorded on the relevant RCDD.

6. ONE TOWER HAMLETS CONSIDERATIONS

- 6.1 This report is concerned with the notification of officers' decisions under Standing Orders and has no direct One Tower Hamlets implications. To the extent that there are One Tower Hamlets Considerations arising from the individual decisions, these would have been addressed in the records of each decision.

7. BEST VALUE (BV) IMPLICATIONS

- 7.1 Best Value implications associated with each of the Corporate Directors' decisions as set out in Appendix 1 would have been identified and evaluated as an integral part of the process which led to the decision.

8. SUSTAINABLE ACTION FOR A GREENER ENVIRONMENT

- 8.1 There are no Sustainable Action for A Greener Environment implications arising from this report.

9. RISK MANAGEMENT IMPLICATIONS

- 9.1 The risks associated with each of the Corporate Directors' decisions as set out in Appendix 1 would have been identified and evaluated as an integral part of the process which led to the decision.

10. CRIME AND DISORDER REDUCTION IMPLICATIONS

- 10.1 There are no Crime and Disorder Reduction implications arising from this report.

11. SAFEGUARDING IMPLICATIONS

- 11.1 Safeguarding risks or benefits associated with each of the Corporate Directors' decisions as set out in Appendix 1 would have been identified and evaluated as an integral part of the process which led to the decision.

Linked Reports, Appendices and Background Documents

Linked Report

- None

Appendices

- Appendix 1 – Corporate Directors' Decisions under Financial Regulation B10

Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012

- None

Officer contact details for documents:

- Bharat Jashapara, Finance Business Partner, Children's Services, Ext. 4960
- Paul Leeson, Finance Business Partner, Development & Renewal, Ext. 4995

Appendix 1: Corporate Directors' Decisions under Financial Regulation B10

Corporate Director	Reference	Amount	Description of Decision	Justification for Decision	Contractor's Name and Address	Date signed	Contact
Debbie Jones Children's Services	014-2016/17	£215,000	Adoption of a capital estimate to provide additional capacity at Langdon Park School 6th Form.	Langdon Park School has a 6th form which is increasing in size as the school becomes more successful. This scheme will provide four additional classrooms by September, whilst the long term scheme to meet accommodation needs is developed.	Tower Hamlets Schools Ltd 2 London Bridge London SE1 9RA	13/07/2016	Calvin Coughlan Children's Services Resources Ext. 4328
Aman Dalvi Development & Renewal	020-2016/17	£234,000	Virement for the purpose of establishing a framework agreement for the appointment of specialist consultants to review the financial viability assessments that are submitted in relation to major planning applications.	This framework approach will support the decision making process on planning applications by securing an opinion from a professionally accredited consultant. This will allow officers to be confident that they have secured the best outcome when making recommendations to Members of Planning Committee and reduces the risk of legal challenge. The costs of the appointments from the framework, estimated at £234,000 over a three year period, will be met from the fees generated by the Planning service.	N/A	19/07/2016	Joseph Ward Major Project Development Ext. 2343
Aman Dalvi Development & Renewal	026-2016/17	£122,915	Adoption of a capital estimate in order that payments of Section 106 resources can be made to Transport for London to fund the relocation of the Vaughan Way cycle docking station to a new site in Dock Street.	A Section 106 contribution was received in respect of the London Dock development (the former News International site) for the specific purpose of relocating the Vaughan Way cycle docking station. In order for the funding to be transferred to Transport for London, the scheme needs to be incorporated into the capital programme.	N/A	21//07/16	Helen Green Planning & Building Control Ext. 3124

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