

CABINET

MAYOR

Mayor John Biggs

CABINET MEMBERS

Councillor Sirajul Islam	(Statutory Deputy Mayor and Cabinet Member for Housing)
Councillor Rachel Blake	(Deputy Mayor and Cabinet Member for Planning, Air Quality and Tackling Poverty)
Councillor Asma Begum	(Deputy Mayor and Cabinet Member for Community Safety and Equalities)
Councillor Sabina Akhtar	(Cabinet Member for Culture, Arts and Brexit)
Councillor Amina Ali	(Cabinet Member for Adults, Health and Wellbeing)
Councillor David Edgar	(Cabinet Member for Environment)
Councillor Danny Hassell	(Cabinet Member for Children, Schools and Young People)
Councillor Candida Ronald	(Cabinet Member for Resources and the Voluntary Sector)
Councillor Motin Uz-Zaman	(Cabinet Member for Work and Economic Growth)

[The quorum for Cabinet is 3 Members]

MEETING DETAILS

Wednesday, 27 November 2019 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

The public are welcome to attend meetings of the Cabinet. Procedures relating to Public Engagement are set out in the 'Guide to Cabinet' attached to this agenda.

Contact for further enquiries:

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Web: <http://www.towerhamlets.gov.uk>

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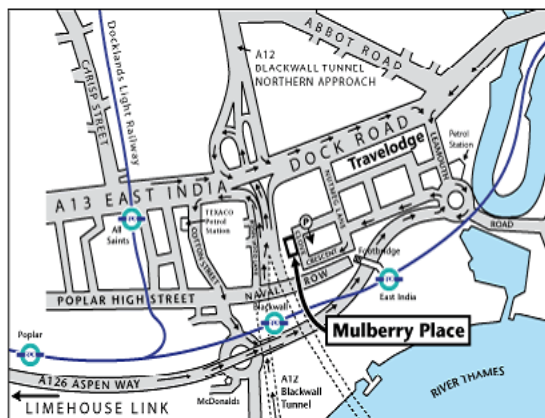
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A Guide to CABINET

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: **Friday, 29 November 2019**
- The deadline for call-ins is: **Friday, 6 December 2019**

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

WEDNESDAY, 27 NOVEMBER 2019

5.30 p.m.

	Pages
1. APOLOGIES FOR ABSENCE	
To receive any apologies for absence.	
2. DECLARATIONS OF DISCLOSABLE PECUNIARY INTERESTS	9 - 12
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	13 - 24
The unrestricted minutes of the Cabinet meeting held on Wednesday 30 October 2019 are presented for approval.	
4. ANNOUNCEMENTS (IF ANY) FROM THE MAYOR	
5. OVERVIEW & SCRUTINY COMMITTEE	
5.1 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.	
5.2 Any Unrestricted Decisions "Called in" by the Overview & Scrutiny Committee	
(Under provisions of Article 6 Para 6.02 V of the Constitution).	

6. UNRESTRICTED REPORTS FOR CONSIDERATION

6 .1	Refresh of Tower Hamlets Substance Misuse Strategy 2020-2025	25 - 60
<p>Report Summary: Refreshing the Tower Hamlets Substance Misuse Strategy will enable us to articulate to residents, our approach to tackling substance misuse problems in the borough.</p> <p>Wards: All Wards Lead Member: Cabinet Member for Adults, Health and Wellbeing, Deputy Mayor and Cabinet Member for Community Safety and Equalities Corporate Priority: A borough that our residents are proud of and love to live in; People are aspirational, independent and have equal access to opportunities; TH Plan 3: Strong, resilient and safe communities; TH Plan 4: Better health and wellbeing.</p>		
6 .2	Award of Contracts for the Support Service in Three Hostels for the Single Homeless	61 - 66
<p>Report Summary: Future contractual arrangements for the provision of support for residents of four hostels in the borough who:</p> <ul style="list-style-type: none">• have been rough sleeping or are otherwise homeless;• often have complex support needs including mental health and substance misuse;• often become physically frail at a much younger age than the general population, necessitating increasing levels of care and support over time. <p>Wards: All Wards Lead Member: Cabinet Member for Adults, Health and Wellbeing Corporate Priority: TH Plan 3: Strong, resilient and safe communities</p>		
6 .3	Adoption of the Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits	67 - 142
<p>Report Summary: The Local Plan sets out a vision, strategic priorities and a spatial planning policy framework for development in the Borough. Its purpose is to direct the determination of planning applications and positively plan for the development and infrastructure requirements to meet the needs of existing and future communities.</p> <p>It is now necessary to adopt the Local Plan to ensure the Council has a robust and up to date spatial planning policy framework.</p> <p>Wards: All Wards Lead Member: Deputy Mayor and Cabinet Member for Planning, Air Quality and Tackling Poverty Corporate Priority: All Priorities</p>		

6 .4	Adoption of the Tower Hamlets Community Infrastructure Levy (CIL) Charging Schedule	143 - 218
Report Summary:		
The Community Infrastructure Levy (CIL) is a charge per square metre applied to most new development. The charge is applied to raise funding to contribute to the delivery of infrastructure to support development.		
It is now necessary to adopt the CIL charging schedule to ensure the Council receives adequate funding for much needed infrastructure across the borough.		
Wards:	All Wards	
Lead Member:	Deputy Mayor and Cabinet Member for Planning, Air Quality and Tackling Poverty	
Corporate Priority:	A borough that our residents are proud of and love to live in	
6 .5	Update Report on recommendations for the future delivery of Contract Services	To Follow
Report Summary:		
This paper provides an update on progress that has been made on delivering the recommendations set out in the February 2019 Cabinet report entitled Recommendations for the future delivery of Contract Services – resolving the deficit position.		
Wards:	All Wards	
Lead Member:	Cabinet Member for Children, Schools and Young People	
Corporate Priority:	TH Plan 1: A better deal for children and young people: aspiration, education and skills	
6 .6	Scrutiny Report - Improving health, environmental quality, economic and social outcomes through Housing Open Spaces	219 - 264
Report Summary:		
This report submits the report and recommendations of the Housing Open Spaces scrutiny review, and the action plan for implementation.		
Wards:	All Wards	
Lead Member:	Statutory Deputy Mayor and Cabinet Member for Housing	
Corporate Priority:	All Priorities	

Report Summary:

This report provides the Mayor in Cabinet with an update on the delivery and implementation of the council’s Strategic Plan

Wards: All Wards

Lead Member: Mayor

Corporate Priority: A borough that our residents are proud of and love to live in

Report Summary:

This report details the Quarter 2 (September 2019) monitoring position against the approved budget for revenue and capital spend for the 2019-20 financial year.

It also includes information on the council’s progress against its saving targets, strategies for reducing overspends and a number of general financial health indicators.

Wards: All Wards

Lead Member: Cabinet Member for Resources and the Voluntary Sector

Corporate Priority: All Priorities

7. ANY OTHER UNRESTRICTED BUSINESS CONSIDERED TO BE URGENT

8. EXCLUSION OF THE PRESS AND PUBLIC

Should the Mayor in Cabinet consider it necessary, it is recommended that the following motion be adopted to allow consideration of any exempt/restricted documents.

“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.

9. EXEMPT / CONFIDENTIAL MINUTES

Nil items.

10. OVERVIEW & SCRUTINY COMMITTEE

10 .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.

10 .2 Any Exempt / Confidential Decisions "Called in" by the Overview & Scrutiny Committee

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

11. EXEMPT / CONFIDENTIAL REPORTS FOR CONSIDERATION

Nil items.

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

Next Meeting of the Committee:

Wednesday, 18 December 2019 at 5.30 p.m. in C1, 1st Floor, Town Hall, Mulberry Place, 5 Clove Crescent, London, E14 2BG

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 C 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 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:-

Asmat Hussain, Corporate Director, Governance and Monitoring Officer. 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 5.09 P.M. ON WEDNESDAY, 30 OCTOBER 2019

**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)
Councillor Rachel Blake	(Deputy Mayor and Cabinet Member for Planning, Air Quality and Tackling Poverty)
Councillor Asma Begum	(Deputy Mayor and Cabinet Member for Community Safety and Equalities)
Councillor Sabina Akhtar	(Cabinet Member for Culture, Arts and Brexit)
Councillor Amina Ali	(Cabinet Member for Adults, Health and Wellbeing)
Councillor David Edgar	(Cabinet Member for Environment)
Councillor Danny Hassell	(Cabinet Member for Children, Schools and Young People)
Councillor Candida Ronald	(Cabinet Member for Resources and the Voluntary Sector)
Councillor Motin Uz-Zaman	(Cabinet Member for Work and Economic Growth)

Other Councillors Present:

Councillor Peter Golds	
Councillor James King	
Councillor Andrew Wood	(Leader of the Conservative Group)
Councillor John Pierce	

Others Present:

Christabel Shawcross	(Safeguarding Adults Board Chair LBTH)
Tracy Smith	CEO Tower Hamlets Education Partnership
Robert Crothers	(Chair of Tower Hamlets Education Partnership)

Officers Present:

Mohammed Ahad	(Community Programmes Officer, Third Sector Team)
Kevin Bartle	Divisional Director of Finance, Procurement and Audit
Adam Boey	(Senior Strategy & Policy Manager - Corporate)
Stephen Bramah	(Deputy Head of the Mayor's office)
Terry Bryan	(Head of Pupil Services and School Sufficiency)
David Courcoux	(Head of the Mayor's Office)
Lucy Fordham	Senior Communications Officer

David Freeman	(Voluntary and Community Sector (VCS) Strategy Manager)
Sharon Godman	(Divisional Director, Strategy, Policy and Performance)
Asmat Hussain	(Corporate Director, Governance and Monitoring Officer)
Debbie Jones	(Corporate Director, Children and Culture)
Christine McInnes	(Divisional Director, Education and Partnership, Children's)
Denise Radley	(Corporate Director, Health, Adults & Community)
Ann Sutcliffe	(Corporate Director, Place)
David Tolley	(Head of Environmental Health and Trading Standards)
Will Tuckley	(Chief Executive)
Sarah Williams	(Legal Services, Governance)
Allyson King	School Organisation Place Planning Manager
Samiha Jahan	(Public Health Officer)
Matthew Mannion	(Head of Democratic Services, Governance)

1. APOLOGIES FOR ABSENCE

Apologies for absence were received on behalf of Neville Murton (Corporate Director, Resources) who was deputised by Kevin Bartle (Divisional Director, Finance, Procurement and Audit).

2. DECLARATIONS OF DISCLOSABLE PECUNIARY INTERESTS

There were no Declarations of Disclosable Pecuniary Interests.

3. UNRESTRICTED MINUTES

RESOLVED

1. That the unrestricted minutes of the Cabinet meeting held on Wednesday 25 September 2019 be approved and signed by the Chair as a correct record of proceedings.

4. ANNOUNCEMENTS (IF ANY) FROM THE MAYOR

The **Mayor** made a number of announcements, including:

- Congratulating the Half Moon Theatre youth group for their work recording a pop song for BBC Children in Need.
- The Council would be working to publicise the EU Nationals Settlement scheme as take up was not yet as high as expected.
- Noting that a general election was due shortly which would impact on the Council's public activities for the pre-election period.

Councillor Amina Ali, Cabinet Member for Adults, Health and Wellbeing, reported that the Council's Local Account report had been published which

highlighted achievements over the past year in adult social care. The full document would be available to view on the Council's website.

5. OVERVIEW & SCRUTINY COMMITTEE

5.1 Chair's Advice of Key Issues or Questions

Pre-Decision Scrutiny Questions, and officer responses, were tabled in respect of the following reports:

- 6.2 Report on the outcome of the public consultation on the closure of Raine's School and the expansion of Oaklands School
- 6.5 Safeguarding Adults Board Annual Report 2018-19
- 6.7 Liveable Streets Programme
- 6.8 Local Community Fund
- 6.11 Nominations to Outside Bodies

These were considered during discussion of the relevant items.

In addition Councillor James King, Chair of the Overview and Scrutiny Committee, provided an update on the Committee's recent activities. He reported that the Committee had held a meeting on Monday at which they had discussed a number of issues including:

- There had been a good discussion about how to strengthen the Council's consultation processes and the use of best practice in this field.
- They had discussed issues around parking and the public realm, with this issue likely to be coming back for a further discussion at a later date.
- The presentation of the report on the Council's gambling policy had resulted in an interesting discussion on the risks of these activities and how concerns were addressed by the Council.

Finally he reported that both the Council's budget plans and a discussion on community safety issues were expected at upcoming meetings,

The **Mayor** thanked Councillor James King for his update.

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

Nil items.

6. UNRESTRICTED REPORTS FOR CONSIDERATION

6.1 Planning for School Places 2019 /20 Review and Recommendations

Councillor Danny Hassell, Cabinet Member for Children, Schools and Young People, introduced the report on planning for school places. He reported that the borough faced a number of demographic challenges with different

population changes in different parts of the borough potentially leading to oversupply of places in some areas whilst others saw a deficit.

He highlighted that taking the right decisions was important to ensure that good quality education could be offered to children within the borough. He noted that the Council had worked hard to be proactive to pre-empt some of the issues that could have arisen.

The Council would be working collaboratively on any proposals that were being developed but that a number of difficult decisions were likely in the future.

During discussion, Councillor Andrew Wood, Leader of the Conservative Group, raised concerns about the temporary site for Canary Wharf College.

The **Mayor** noted that officers were looking into possible solutions for schools in that area including Canary Wharf College. He thanked officers for their hard work on the issues highlighted in the report and noted that he didn't underestimate the challenging decisions which lay ahead. He then **agreed** the recommendations as set out.

RESOLVED

1. To note the position on the current and projected demand for school places;
2. To agree the plans put forward in paragraph 3.12 of the report to rationalise the primary school provision in areas of surplus,
3. To note the progress made in relation to:
 - The development of a new primary school at Wood Wharf on the Isle of Dogs.
 - The development and the arrangements for the appointment of the school provider for the new secondary school at London Dock;
 - The development of a secondary provision at Westferry Printworks on the Isle of Dogs and the options for determining the school to occupy this new site;
 - The progress on the expansion of Phoenix Special School on the site of the former Bow Boys Secondary School at Paton Close, E3 and the planned enlargement of Beatrice Tate Special School.
 - The plans and options for future school developments to meet the anticipated need for additional places.
4. To agree the recommendation not to proceed with plans for a new 2FE primary school at the site of Alpha Square.
5. To note that this report sets out the Council's plan to exercise its Education functions, not its functions as a Local Planning Authority (LPA). It aligns with the LPA stance at the Local Plan Examination in Public, particularly on the plan to retain the majority of the current allocation of school sites.

6. To note the specific equalities considerations as set out in section 5 of the report.

6.2 Report on the outcome of the public consultation on the closure of Raine's School and the expansion of Oaklands School

Councillor Danny Hassell, Cabinet Member for Children, Schools and Young People, introduced the report on the recent public consultation in respect of the potential closure of Raine's School and also on the possible expansion of Oaklands School.

He highlighted the reasons which had been set out which demonstrated the viability concerns in respect of Raines School and also described the efforts of the Council to support the school over recent years. The number of pupils was reducing with a direct impact on the financial viability of the school and in addition exam results were below Tower Hamlets averages. The report was therefore recommending that the most appropriate course of action would be to proceed to the statutory consultation in respect of potentially closing the school.

The **Mayor** opened the item up for discussion and noted a number of issues including:

- That the Council was not expecting the Department for Education to intervene.
- The Schools adjudicator had raised concerns over Council processes.
- The need to ensure a good quality of education could be provided to all pupils and the need to offer greater opportunities for achievement.
- Whether there were lessons to be learnt for future cases.
- The role of the school governing body in supporting a school.

The **Mayor** thanked everyone for their contributions. He reported that he had carefully considered all the papers that had been set out including the detailed appendices.

He also confirmed he had considered the exempt appendices and agreed the reasons for exemption set out as they contained information which would identify individuals.

He noted the pre-decision scrutiny questions and officers responses.

Finally he **agreed** the recommendations as set out in the report.

RESOLVED

1. To note the outcomes of the informal stage of consultation and Equality Impact Analysis.
2. To agree to publish a Statutory Notice and Proposal for the closure of Raine's Foundation Trust School;

3. Agree to proceed to the next stage of the statutory consultation by publishing the Notice in order to initiate the Statutory Representation Period to run from 4th November to 2nd December 2019.
4. To note that further proposals are being developed with respect to the potential expansion of Oaklands School.

6.3 Tower Hamlets Brexit Preparations Update

The **Mayor** withdrew this agenda item following the deferral of the proposed Brexit date by the government but reported to the meeting that the Council were continuing to monitor developments and would report back if required at a later date.

6.4 Safeguarding Children Board Annual Report 2018-19

Councillor Danny Hassell, Cabinet Member for Children, Schools and Young People, introduced the report setting out the Annual Report of the Safeguarding Children's Board.

He explained that this was the final report under these arrangements with a new partnership arrangement replacing the Board from the summer of 2019. He highlighted a number of points from the report including:

- The report set out the vital work undertaken by the Council and its partners.
- This also demonstrated the commitment of partners such as the police to tackling these issues.
- Partnership working made an important contribution to the Council's 'Good' OFSTED rating.
- There was a significant growth in child protection cases due to neglect with poverty being a clear related issue.

Finally he placed on record his thanks to Stephen Ashley who had chaired the Board for the last two years.

The **Mayor** echoed the thanks to Stephen Ashley and the board as a whole. He also thanked the partners, officers and Lead Member for their support and he **agreed** the recommendations as set out.

RESOLVED

1. To note content of the LSCB Annual Report 2018-19
2. To note the specific equalities considerations as set out in paragraph 4.1 of the report.

6.5 Safeguarding Adults Board Annual Report 2018-19

Christabel Shawcross, Independent Chair of the Safeguarding Adults Board, introduced the report setting out their Annual Report for 2018-19.

She took Members through the report and highlighted a number of key points from the report. This included the following notes:

- There had been an increase in the number safeguarding concerns raised which the Board considered reflected growing awareness of the issue.
- However, there had been a reduction in enquiries from these referrals which was seen as reflecting improved training on when it was appropriate to refer cases.
- The Board were exploring where there may be gaps and issues not being covered.
- That 88% of care users said the service helped them feel safe.
- A lot of work was being undertaken on how to best target resources and the report set out key challenges for the next few years.
- The Board played an important role in challenging providers and ensuring their services were of good quality.

The **Mayor** welcomed the report and thanked Christabel Shawcross for her hard work as Chair and the work of the whole Board. He noted the challenges that were presented and in particular the rapid growth in service demand from those with learning disabilities. He noted the pre-decision scrutiny questions and officer responses and **agreed** the recommendation as set out.

RESOLVED

1. To endorse the Safeguarding Adults Board Annual Report 2018-19.

6.6 Tower Hamlets Education Partnership Financial Statements and Annual Review 2018-19

Tracy Smith (Executive Director) and Robert Crothers (Chair) of the Tower Hamlets Education Partnership introduced the report setting out the Partnership's Financial Statement and Annual Review.

They took Members through the report highlighting that:

- The report demonstrated the growing robustness of the organisation, this included having a strong financial position.
- The strong buy-in from schools.
- The excellent results children were able to achieve at Tower Hamlets schools but also those areas where work was needed.
- The vital role that professional development for teachers had in ensuring good outcomes for pupils.
- The Partnership was really ambitious to make a big difference in the future.

The **Mayor** welcomed the report and thanked Tracy and Robert for their hard work, highlighting how important the leadership of the Partnership was to the outcomes for schools. He noted the changing landscape in education and the role the Partnership could play in supporting education in the borough. He **agreed** the recommendations as set out.

RESOLVED

1. To note the activity of THEP as summarised in the THEP Annual Review 2018-19.
2. To accept the audited accounts as contained within the THEP Annual Report and Financial Statements for the year ending 31 March 2019.
3. To endorse the role of THEP in delivering Council priorities.

6.7 Liveable Streets programme report

The **Mayor** introduced the update report on the Liveable Streets programme. He explained that this was a noting report providing details on lots of good work the Council was undertaking on a project which had not been formally reported to date. The aim was to work with residents and businesses to promote a better street environment, reduce rat-running and pollution as well as support vulnerable road users.

He noted the pre-decision scrutiny questions and officer responses and **agreed** the recommendations as set out.

RESOLVED

1. To note the details of the Liveable Streets programme;
2. To note the governance and decision-making process for the individual scheme approval.

6.8 Local Community Fund

Councillor Candida Ronald, Cabinet Member for Resources and the Voluntary Sector, introduced the report providing an update on transitional arrangements and equality mitigation actions in relation to the Local Community Fund. She highlighted that linked to this work reports would be coming to the Grants Determination Sub-Committee for agreement shortly. She noted:

- The revised criteria for emergency funding.
- The actions against gaps which had been identified.
- The work to build the capacity of Somali organisations.
- The next round of the small grants programme would be announced shortly.

The **Mayor** thanked the Lead Member for her report. He noted the pre-decision scrutiny questions and **agreed** the recommendation as set out.

RESOLVED

1. To note the progress relating to the transitional arrangements and equality mitigation actions for services whose current MSG funding came to an end on 30 September 2019 as set out in the report and appendices to the report.

6.9 Response to Overview and Scrutiny Committee's recommendations on Safety, Aspiration and Inclusion (2019 Trilogy Report)

In moving the report, the **Mayor** noted that it covered the work of a number of Cabinet Members.

Councillor Danny Hassell, Cabinet Member for Children, Schools and Young People initially introduced the report and looked at the areas covered in relation to his portfolio in particular highlighting the work to close gaps in attainment in schools and in ensuring there was a viable sixth form offer available. He noted that one scrutiny recommendation in relation to movement of pupils between schools was not being taken forward due to the need to see the impact of recent changes in this area before making any further changes.

Councillor Asma Begum, Deputy Mayor and Cabinet Member for Community Safety and Equalities, then discussed the issues raised in relation to her portfolio in particular highlighting work to improve anti-social behaviour complaint reporting across statutory partners.

Finally the **Mayor** highlighted a number of others areas of the report including those around upskilling residents for employment opportunities and how the Council could support aspirational young people.

He welcomed the report as an example of the good work scrutiny could perform in supporting the aspirations of the Council. He **agreed** the recommendations as set out.

RESOLVED

1. To note the Overview and Scrutiny Committee's (OSC) June 2019 report recommendations on community safety, educational aspirations and employment aspirations at Appendix 2 to the report;
2. To note the recommended Cabinet response to the OSC's June 2019 report at Appendix 1 to the report; and
3. To support officers' reporting of progress to OSC by June 2020.

6.10 Gambling Policy 2019- 2022

Councillor David Edgar, Cabinet Member for Environment, introduced the report on the updated Gambling Policy for 2019-22. He reported that the Council was required to review the policy every three years and that it was an

important document in helping prevent gambling related crime and disorder, protecting children and the vulnerable and generally preventing harm relating to gambling.

The **Mayor** noted that changes to the policy were highlighted in the documents. He noted that no new licenses had been issued since 2014 which was seen as encouraging and he welcomed the reduction in prize money on fixed odds betting terminals. He **agreed** to recommend the policy to Council for adoption.

RESOLVED

1. To recommend to Full Council the adoption of the revised Gambling Policy.

6.11 Nomination to Outside Bodies

The **Mayor** introduced the report proposing nominations to outside bodies. He noted the pre-decision scrutiny questions, and officer responses, and then **agreed** the recommendation as set out.

RESOLVED

1. To agree the nominations to outside bodies as shown in Paragraph 3.3 of the report.

7. ANY OTHER UNRESTRICTED BUSINESS CONSIDERED TO BE URGENT

Nil items.

8. EXCLUSION OF THE PRESS AND PUBLIC

Nil items.

9. EXEMPT / CONFIDENTIAL MINUTES

Nil items.

10. OVERVIEW & SCRUTINY COMMITTEE

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

Nil items.

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

Nil items.


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

Nil items.

The meeting ended at 7.25 p.m.

MAYOR JOHN BIGGS

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<p>Cabinet</p> <p>27th November 2019</p>	 <p>TOWER HAMLETS</p>
<p>Report of: Denise Radley – Corporate Director Health, Adults and Community</p>	<p>Classification: Unrestricted</p>
<p>Refresh of Tower Hamlets Substance Misuse Strategy 2020-2025</p>	

Lead Member	Councillor Asma Begum Cabinet Member for Community Safety and Equalities Councillor Amina Ali Cabinet Member for Adults, Health and Wellbeing
Originating Officer(s)	Marion Morris – Policy Manager – Substance Misuse
Wards affected	All wards
Key Decision?	Yes
Forward Plan Notice Published	7 th May 2019
Reason for Key Decision	Impact on Wards
Strategic Plan Priority / Outcome	Priority 1 People are aspirational, independent, and have equal access to opportunities Priority 2 A borough that our residents are proud of and love to live in

Executive Summary

The Substance Misuse Partnership strategy sets out the strategic direction for tackling substance misuse over the next five years for adults and young people in Tower Hamlets (2020-2025). It is Tower Hamlets third Substance Misuse Strategy and re-confirms the commitment of the council and its partners to tackle the issue.

The primary focus of the strategy is on the use of Class A drugs such as heroin and crack cocaine. This is the type of drug use most associated with the use of drugs in public places and the significant open drug market and accounts for up to 90% of resident complaints to the council. The class A drug market also acts as a driver for violence, including knife crime and the criminal and sexual exploitation of young people. This does not however preclude consideration of other types of drug use such as khat use in the Somali community, high strength cannabis use (skunk) use by younger people, alcohol, poly drug use and chem-sex all of which feature in the strategy. The strategy seeks to encourage and promote a culture of responsible drinking and the responsible management of licensed premises to reduce alcohol related harms to those who drink and the wider community. The cross cutting nature of substance misuse means that both the Community Safety Partnership Board and

the Health and Wellbeing Board have an interest in the strategy, although formal accountability for delivery sits with the Community Safety Partnership Board.

Recommendations:

The Mayor in Cabinet is recommended to:

1. Endorse the Tower Hamlets Community Safety Partnership Substance Misuse Strategy attached at appendix 1.
2. To note the specific equalities considerations as set out in Paragraph 9 and the actions that will be taken to mitigate these.
3. To note that the strategy will be underpinned by detailed annual delivery plans. It will be officially launched in January 2020 when an online version and a printed version of the strategy will be made available to residents.

1 REASONS FOR THE DECISIONS

- 1.1 Under section 6 of the Crime and Disorder Act (1998) there is an obligation to formulate and implement strategies (with other specified authorities) that reduce crime and disorder, combat the misuse of drugs, alcohol and other substances and reduce re-offending.
- 1.2 Although the Community Safety Strategy fulfils this statutory function, the Substance Misuse strategy articulates the overall vision for reducing drug and alcohol related harms in Tower Hamlets and provides an overarching framework and direction over the next five years.

2 ALTERNATIVE OPTIONS

- 2.1 The option of not developing an overarching strategy was considered. However, given that Tower Hamlets has a significant drug and alcohol problem and the degree of resident concern around substance misuse, an overarching strategy is necessary to forge a partnership approach to tackling substance misuse in the borough.

3 DETAILS OF THE REPORT

Background

- 3.1 Section 6 of the Crime and Disorder Act (1998) places a duty on the Community Safety Partnership to formulate and implement a) a strategy for the reduction of crime and disorder in the area (including anti-social and other

behaviour adversely affecting the local environment); b) a strategy for combatting the misuse of drugs, alcohol and other substances in the area and c) a strategy for the reduction of re-offending in the area.

- 3.2 The Substance Misuse Strategy specifically addresses point b) of this duty (combatting the misuse of drugs and alcohol) and a) the reduction of crime - where crime is related to drugs or alcohol use and c) where re-offending is linked to drug use.

4 DEFINING SUBSTANCE MISUSE

- 4.1 Substance misuse is the act of regularly taking one or more drugs in order to change mood, emotion or state of consciousness. Throughout this strategy, substance misuse is taken to include illicit drugs, the abuse of prescription drugs, new psychoactive substances (NPS) such as nitrous oxide, and alcohol. It does not include tobacco. While the primary focus of this strategy is on drug and alcohol use that causes the most harm to individual users and the wider community, it also covers increasing risk drinking and recreational drug use.

5 HOW THE SUBSTANCE MISUSE STRATEGY WAS DEVELOPED

- 5.1 The Substance Misuse Strategy was developed following consultation with residents, including parents of teenagers, our partners across health, the voluntary sector, the police, London Community Rehabilitation Company; Interfaith Forum, LGBT Forum, senior staff across the council and people who use drug and alcohol support services. It is supported by best practice and evidence.
- 5.2 A variety of consultation methods were used from semi-structured interviews, an on-line resident survey, a drop-in at the Whitechapel Idea Store, attendance at key Ward Panels and a focus group with parents of teenagers. A workshop with the Mayors Advisory Board and an Appreciative Enquiry session with the Partnership Executive Group were also undertaken. The Consultation Report is included as a link to this report.

6 VISION

- 6.1 The overarching vision of the strategy is to **'reduce drug and alcohol-related harms to individuals, families and communities in Tower Hamlets and to enable more of our residents to recover from problematic substance misuse'**.

7 APPROACH

- 7.1 The strategy recognises that substance misuse is both a criminal justice and a public health issue and that factors such as poverty, unemployment and social deprivation are significant risk factors for the development of problematic

substance misuse. The contribution that other council strategies and policies can play in tackling wider determinants of health which impact on substance misuse is key to the success of the strategy along with working with residents in co-production and problem solving.

- 7.2 The strategy is informed by an evidence based Harm Reduction approach which aims to minimise negative health and social impacts associated with drugs or alcohol use and support people in recovery from substance misuse. The use of appropriate enforcement and regulatory interventions/ services is also a key to delivery and success along with the involvement of residents.

8 PRIORITIES

Priority 1 Early Intervention and Prevention

Priority 2 Evidence based treatment and recovery support

Priority 3 Reducing Drug and Alcohol related harm and anti-social behaviour.

9 EQUALITIES IMPLICATIONS

- 9.1 An Equalities Assurance Checklist was conducted and concluded that there was no need to conduct a full Equality Impact Assessment as the strategy is not proposing any fundamental changes. Equality issues which were identified are addressed in the body of the strategy. **Gender:** the need to increase access to treatment for women in general and pregnant women in particular, women experiencing domestic abuse and those involved in street based prostitution.
- 9.2 **Sexual orientation and transgender:** The LGBT community are one of the 'at risk' groups for substance misuse and experience higher levels of mental health problems than the general population. There is also some evidence of higher rates of alcohol use among lesbian and bisexual women. Work to improve access to substance misuse treatment for gay men and men who have sex with men who are involved in chem sex is one the strategy's objectives. The strategy also aims to promote greater use of alcohol screening both through online 'DrinkCoach' and in person through Alcohol Identification and Brief Advice (IBA). Sexual orientation and gender identity monitoring in all services, and staff training in relation to the needs of the LGBT+ community will be undertaken.
- 9.3 **Ethnicity:** The ethnic profile of people accessing substance misuse services is broadly reflective of the boroughs profile. The stigma associated with substance misuse can make it difficult to have open conversations for religious or cultural reasons within the Bangladeshi and Somali communities. We will be encouraging more open conversations with all residents through a planned Anti-Stigma Campaign, greater community involvement and a series of Information and Advice leaflets in Bengali and Somali for the older population of parents, or grand-parents who may not speak English. More

generally we will be working in partnership with agencies in contact with the South Asian community e.g. Mosques, the third sector and other inter-faith groups to improve uptake of services and ensure all communities understand the risks associated with drug and alcohol use. We will also be reviewing how we can better meet the needs of the Somali Community as per the recommendations of the Somali Task Force and findings of the Substance Misuse Needs Assessment.

- 9.4 **Disability:** 47% of those who started adult treatment in Tower Hamlets have an identified mental health need, which is higher than the England average. The strategy aims to improve access to mainstream mental health services and to improve the Dual Diagnosis offer within substance misuse services.

10 OTHER STATUTORY IMPLICATIONS

- 10.1 **This** section of the report is used to highlight further specific statutory implications that are either not covered in the main body of the report or are required to be highlighted to ensure decision makers give them proper consideration. Examples of other implications may be:
- Best Value Implications,
 - Consultations,
 - Environmental (including air quality),
 - Risk Management,
 - Crime Reduction,
 - Safeguarding.
 - Data Protection / Privacy Impact Assessment.
- 10.2 **Consultation** – whilst not a statutory requirement the following consultation was undertaken and has informed the commitments and actions in the strategy as in 5-5.2 above
- 10.3 **Safeguarding:** The Tower Hamlets Adult Safeguarding Board and The Tower Hamlets Safeguarding Children’s Board work in partnership around safeguarding issues that pertinent to substance misuse for vulnerable adults and children. All commissioned substance misuse services have appointed Safeguarding leads.
- 10.4 **Risk Management** following the recent re-tender of the adult substance misuse treatment service it is anticipated that there may be a dip in performance, which is not unusual following a re-tendering process. This will be closely monitored.

11 COMMENTS OF THE CHIEF FINANCE OFFICER

- 11.1 In 2019-20 the Council's gross budgeted expenditure directly attributable to substance misuse is £7.7m.
- 11.2 There are no immediate direct financial implications from the recommendations of this report. The activities considered necessary to deliver the strategy will need to be given financial consideration when the annual delivery plan is constructed and factored in to the annual MTFS refresh.

12 COMMENTS OF LEGAL SERVICES

- 12.1 The proposed strategy complies with the Council's duties under section 6 of the Crime and Disorder Act 1998, which requires the Community Safety Partnership to formulate and implement a strategy or combatting the misuse of drugs, alcohol and other substances in the area and a strategy for the reduction of re-offending in the area. Additionally, section 2B of the National Health Service Act 2006 places a duty on the Council to take such steps as it considers appropriate for improving the health of the people in its area.
- 12.2 In carrying out its functions, the council must comply with the public sector equality duty set out in section 149 Equality Act 2010, namely it must have due regard to the need to eliminate unlawful conduct under the Equality Act 2010, the need to advance equality of opportunity and to foster good relations between persons who share a protected characteristic and those who do not.

Linked Reports, Appendices and Background Documents

Appendices

- Substance Misuse Strategy – Appendix 1

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

<https://democracy.towerhamlets.gov.uk/mglIssueHistoryHome.aspx?IssueId=93739&OptionNum=0>

Officer contact details for documents:

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marion.morris@towerhamlets.gov.uk
[Phone 0207489 3183](tel:02074893183)

APPENDIX 1

Tower Hamlets Partnership Substance Misuse Strategy 2020-2025



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Foreword

Mayor, Deputy Mayor & Cabinet Member for Adults, Health & Wellbeing

We are pleased to introduce the third Tower Hamlets Partnership Substance Misuse Strategy which sets out how we will work across the Partnership to reduce drug and alcohol related harms. The strategy builds on previous strategies and reconfirms our continued commitment to tackling substance misuse in the borough.

Drug and alcohol use can have a far reaching and devastating impact on individuals and communities, and we know that there are significant challenges to be faced in Tower Hamlets. Our overall aim is **'To reduce drug and alcohol related harms to individuals, families and communities in Tower Hamlets and to enable more residents to recover from problematic substances misuse'**. We will do this by focusing on three priority areas:

1. Early intervention and prevention.
2. Effective evidence based treatment and recovery support.
3. Reducing drug and alcohol related crime and anti-social behaviour through enforcement and regulation.

The primary focus of the strategy is on drug and alcohol use that causes the most harm to individuals and communities and covers both adults and young people. This tends to be primarily crack and heroin use in adults and cannabis, new psychoactive substances and alcohol use in younger people. The strategy also recognises that there are different types of drug use within our diverse communities and the need to address this. In addition the alcohol-related element of our strategy seeks to encourage and promote a culture of responsible drinking coupled with responsible management of licensed premises.

Overall, substance misuse is a major public health issue and negatively impacts on individuals, families and communities. It is a causal factor in a range of health and social harms and is a major area of concern for our residents. The causes of substance misuse are multi-faceted, and the success of this strategy will only be realised by taking a partnership approach, working together with our residents and those experiencing drug and alcohol problems.

It also requires that we address some of the wider determinants of health like meaningful employment and decent housing that can make a significant difference to recovery from drug and alcohol misuse. The contribution that other strategies and policies play in tackling these wider determinants is key.

At the heart of our approach is the community. We are committed to working with residents in finding lasting solutions to the substance misuse problems in the borough and to making recovery from substance misuse possible.

Introduction

This strategy outlines the Tower Hamlets' Partnership approach to tackling the problems associated with drug and alcohol misuse in the borough. It presents the high level priorities for action over the next five years (2020 – 2025) and will be supported by more **detailed annual delivery plans**. The commitments and actions in this strategy are a direct reflection of the priorities expressed by stakeholders from across the council, NHS, Metropolitan Police, London Community Rehabilitation Company, voluntary sector, Interfaith Forum, LGBT Forum, residents and people who use drug and alcohol support services. It is supported by best practice¹ and evidence².

In this strategy we have taken into consideration current³ national drug and⁴ alcohol strategies⁵, public health evidence⁶, clinical guidelines along with local strategies that could support delivery of this strategy, some of which were being developed in a similar time frame, such as the Joint Mental Health Strategy and Children and Families Strategy. We will be working closely to ensure this strategy is aligned with the Health and Wellbeing Strategy due to be refreshed in 2020. We have also sought to identify gaps in the previous strategy and strategies programmes that address the wider determinants of health. These can be seen at appendix 1.

The consultation report and needs assessment that have informed this strategy can be found on the council website at: <https://democracy.towerhamlets.gov.uk/mg/IssueHistoryHome.aspx?IssueId=93739&OptionNum=0>

Approach

Informed by an evidence based harm reduction approach - aims to minimise negative health and social impacts associated with drugs or alcohol use and support people in recovery

Supported by the use of appropriate enforcement and regulatory interventions and services

At the heart of our approach is the **community**. We are committed over the life of this strategy to **working with residents** in finding lasting solutions to the substance misuse problems in the borough.

Current Spend on Substance Misuse

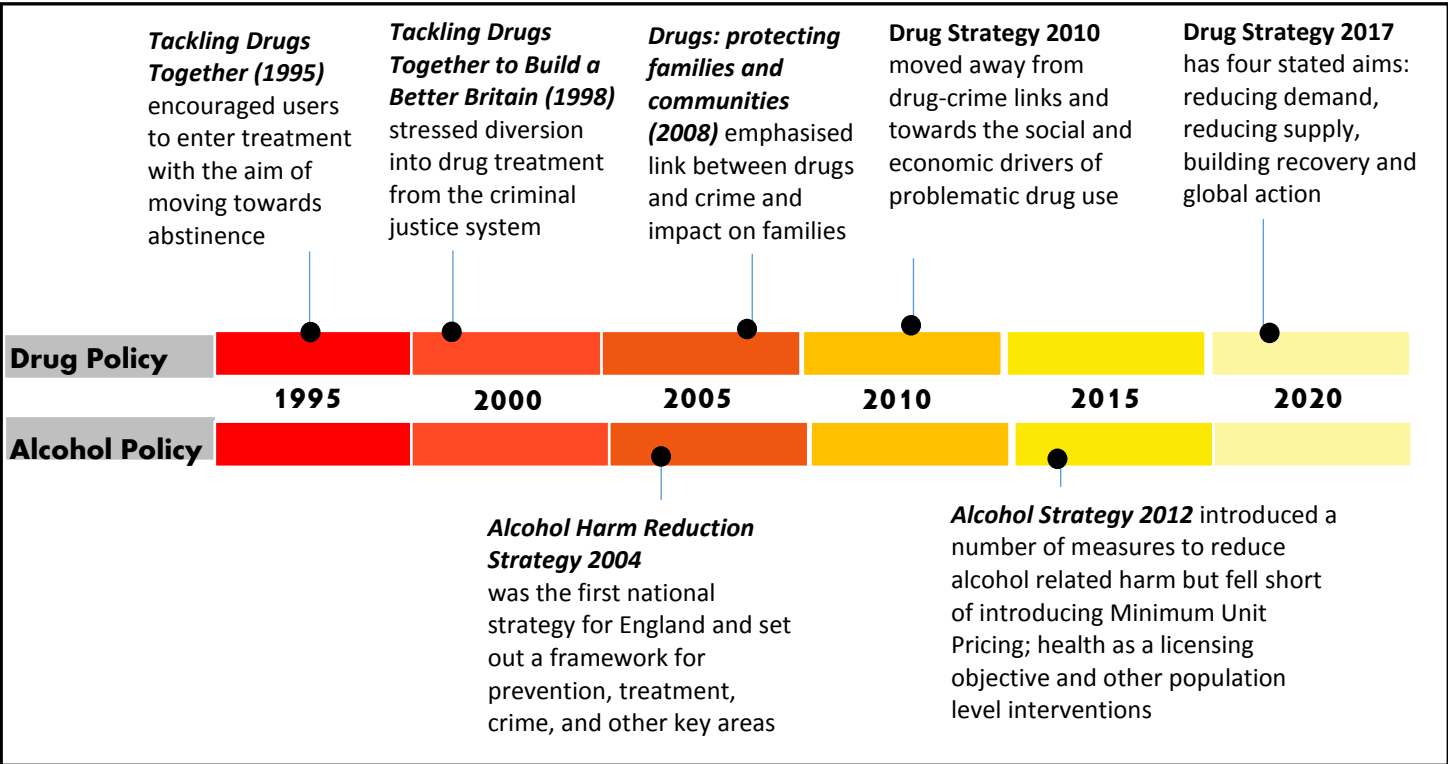
Total budget for 2019 - 2020 £7,749,178.00

Made up of:

- Public Health Grant - £7,100,000.00
- Mayors Office for Policing and Crime (MOPAC) - £433,000.00
- General Fund - £220,600.00

Crime Reduction	£	433,000.00
Preventing and reducing harm: alcohol	£	336,931.25
Preventing and reducing harm: drug	£	1,588,731.25
Treatment: alcohol	£	2,396,757.75
Treatment: drug	£	2,948,757.75
(internal recharge)	£	45,000.00

National policy context



Drug policy

Drug policy is often subject to intense debate. The debate largely focuses on the extent to which drug use is viewed as a criminal justice or a public health issue. Whilst harm reduction, an approach to drugs policy that focuses primarily on reducing the level of harm associated with drug use, has been a feature of drug policy, professional bodies such as the Royal College of Physicians⁷, the Royal Society of Public Health⁸ and the Government’s Advisory Council on the Misuse of Drugs (ACMD) have suggested that it has not gone far enough and have called for a greater focus on harm reduction. Political interest in harm reduction policies has also been growing of late, with Members of Parliament on both sides of the political spectrum urging the Home Office to sanction drug

consumption rooms and greater political interest in the decriminalisation of cannabis.

Alcohol policy

In England, responsibility for alcohol policy is shared between various departments, with the Home Office and Department of Health and Social Care being the main leads. A number of health and alcohol groups have called for an updated national alcohol strategy which would be based on the Public Health England evidence review⁹ and called for reforms including the adoption of minimum unit pricing¹⁰ of alcohol (as has happened in Scotland) and for a legal requirement to include health in alcohol licensing decisions among other things. An alcohol charter developed by a cross-party parliamentary group contains full details of the suggested reforms¹¹.

Understanding substance misuse

Substance misuse is the act of regularly taking one or more drugs in order to change mood, emotion or state of consciousness¹². The motivations behind substance misuse can vary significantly, from self-medication, pain relief to pleasure. While drug or alcohol use does not always lead to dependence, no type of substance use is without risk of harm, whether this is legally sanctioned drugs such as alcohol or illegal drugs such as cocaine.

Throughout this strategy, substance misuse is taken to include illicit drugs, the abuse of prescription drugs, new psychoactive substances (NPS) such as nitrous oxide, and alcohol. It does not include tobacco. Whilst the primary focus of this strategy is on drug and alcohol use that causes the most harm to individual users and the wider community, it also covers increasing risk' drinking and recreational drug use.

Problem or Problematic drug use

Problem or problematic drug use can be either recreational or dependent. It is not necessarily the frequency of drug use but rather the impact that drug use has on an individual and those close to them that indicates there is a problem. The Home Office has traditionally defined problematic drug use as crack cocaine and heroin/opiate use; however at least some of this harm is caused by the illegality of these drugs. Appendix 2 outlines an evidence based Drugs Harm Profile with alcohol at the top of the list for harm. Problematic drug use is however usually characterised by dependence, meaning that the substance is needed for the person to function normally. The person may also experience social, physical, psychological or legal problems¹³. Problematic drug use is the type of use that causes the most harm to communities through drug related crime and anti-social

behaviour and for this reason it is the primary focus of this strategy. Generally, those who are dependent on drugs experience more stigma than those with alcohol problems. This may in part be due to drug laws¹⁴ which criminalise certain forms of drug use.

Alcohol risk levels

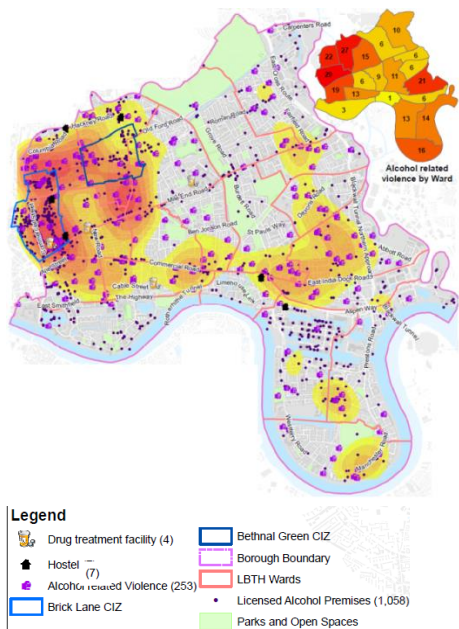
As many as one in four people in the UK are drinking at levels that could be causing harm to their health. Most will be unaware that they are drinking at 'increased' or 'higher risk' because we tend to think of alcohol harm only in terms of dependency. However, there is a spectrum of risk ranging from low risk through to increasing risk and possible dependency. The Alcohol Use Disorders Identification Test (AUDIT C) is an evidenced based screening tool developed by the World Health Organisation to assess risk and possible dependency¹⁵ and is combined with Identification and Brief Advice or IBA to encourage low risk drinking. It is the standard screening tool used widely by health professionals locally¹⁶ and nationally and has the potential to be used in a wider range of settings such as pharmacies and other health and social care settings. Appendix 3 contains more information on alcohol units, levels of risk and what they mean and Brief Advice. As with problematic drug use, apart from the direct health harms to the individual who is drinking, there can be wider social harms which extend to children, families and wider society such as safeguarding issues, alcohol related crime and violence (including domestic violence), teenage pregnancy, sexually transmitted infections, loss of workplace productivity and homelessness.

What does the drug and alcohol landscape look like?

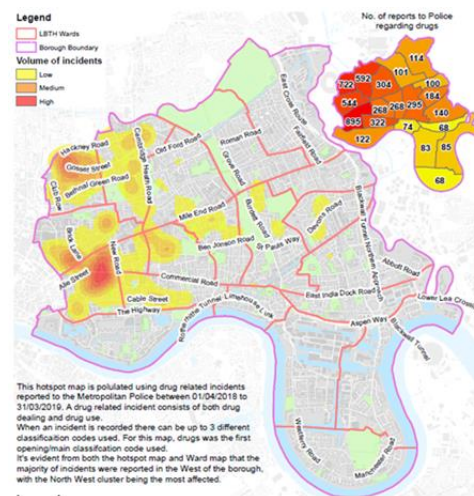
67% of residents felt drug using or dealing		48% of residents cite crime as one of their	
Open use of cannabis and nitrous oxide		Highly visible and open class A drug	
Home to 7 hostels providing mid-high		Over 1000 licensed premises of which	
Night-time economy in Brick Lane &		Historical problem of the sale of single cans,	

2 Cumulative Impact Zones	63% of alcohol related crime occurs in the Cumulative Impact Zones	Concentration of hostels and substance misuse provision
---------------------------	--	---

Alcohol-related violence & licensed premises



Tower Hamlets drug related incidents reported to the police 18-19



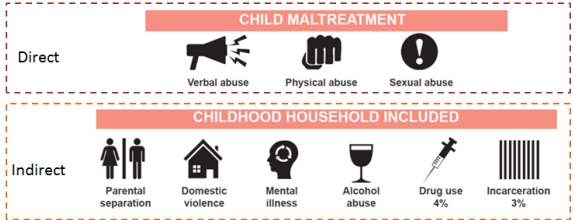
Risk Factors

Factors such as poverty, unemployment and social deprivation are significant risk factors for the development of more problematic or dependent forms of drug or alcohol use. Although levels of poverty are still high, Tower Hamlets has become less deprived compared to other parts of England. Between 2015 and 2019 Tower Hamlets moved from the 12th most deprived area in England to the 50th most deprived. It was the most deprived part of London in 2015 but is now the 5th most deprived.

Drug use and misuse tends to be clustered in areas of high social deprivation. This deprivation is likely to be a key driver behind health inequalities and the prevalence of smoking and drug and alcohol use in Tower Hamlets.

Some groups of people are also more vulnerable to developing substance misuse problems. Those with pre-existing mental health conditions, including anxiety and depression are particularly at risk¹⁷. Children who have experienced four or more adverse childhood experiences (ACES¹)¹⁸ are 11 times more likely to have used heroin or crack and to have been incarcerated.

Simply put, the more adversity a child experiences, the greater the impact on their physical and mental health.



Source: Centre for Public Health: Liverpool John Moors University 2016


We know that criminal and sexual exploitation can happen when young people and vulnerable adults are involved in drug trafficking, supply and dealing (sometimes through gangs or County Lines). To date 119 people from Tower Hamlets have been identified as potentially being involved in County Lines¹⁹. Vulnerable adults are also at risk of having their property being taken over for drug dealing (known as cuckooing). Additional factors for being at greater risk of sexual or criminal exploitation include a history of physical or sexual abuse, poverty, and having a learning or mental health difficulty²⁰. People who are homeless are at increased risk of substance misuse and mental ill health is associated with homelessness both as a cause and a consequence.²¹


An understanding of risk factors allows us to better focus and join up our selective prevention efforts in working with vulnerable children, young people and adults to reduce their risk of involvement in drugs or alcohol, gangs, 'County Lines' activity, or being subject to sexual or criminal exploitation.²


The increasing use of social media to buy and sell drugs across platforms such as Instagram, Facebook and Twitter has made it easier for young people to both buy drugs and be 'groomed' online to deal drugs²² and with 17% of Tower Hamlets parents in the most recent Parent Carer Survey (2018) stating that they do not feel confident to monitor their children's use of social media; then this is a new and emerging area of concern.


² The Violence, Vulnerability and Exploitation Strategy will more fully address gangs, serious youth violence and drug dealing

Certain groups of young people and adults are also more at risk of developing a substance misuse problems, including:

Children who are looked after 

Care leavers 

Those not in Education, Employment or Training (NEETS) 

Children whose carers or families use drugs 

Those subject to sexual 

Homeless

Young People excluded

LGBT Community 

23

Local Picture

50th most deprived local authority in



GCSE attainment levels higher than national levels.



The highest child poverty rate in

Estimated 119 young people involved in



Ranked 8th most employment deprived authorities in London.



Lower life expectancy for men and women



Home to the largest Bangladeshi population in the



Large proportion of both social and private rented



1 in 6 households are classed as



North West of the borough has higher rates of:

- Unemployment
- Drug & alcohol misuse
- Patients diagnosed with severe mental health
- Self-reported and GP recorded rates of depression



24

Prevalence

Drug Misuse in adults

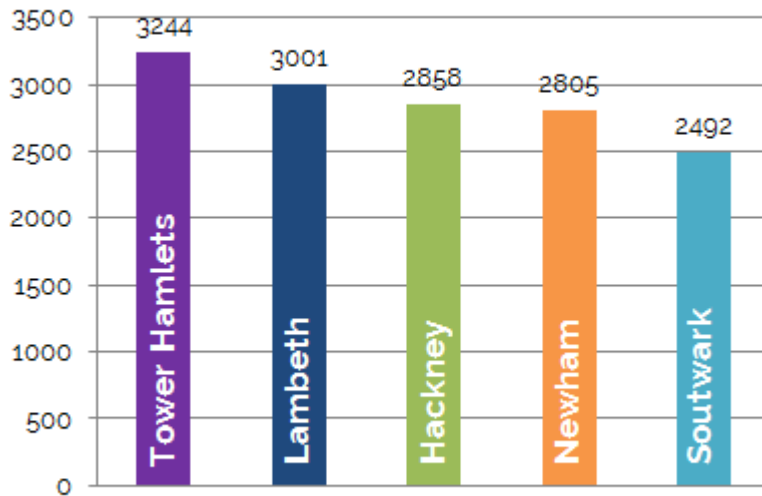
Tower Hamlets has the highest estimated rate of opiate and	3,244 or 14.4 per 100,000 population	Drugs of choice of those in treatment are primarily class	Older population in treatment
--	--------------------------------------	---	-------------------------------

52% of this population (3,244) were not in drug



47% have mental health issues ranging from anxiety and depression to acute

Opiate and/or Crack Users – Top 5 LAs in London



(Source: PHE Prevalence data, 2016/17, published April 2019)

Young People Substance Misuse²⁵

Overwhelming sources of referrals into treatment is through the

6% of secondary school children have tried drugs mostly solvents, and cannabis.

6% of 5-16 year olds

Drugs of choice of those in treatment are predominantly

(Source: People's attitude survey 2017, PHE fingertips)

Out to the 158 young people in treatment in 2017/18 Q3, there were 3 looked after children, 11 were not in education training or employment and 41 had

Alcohol Misuse in adults²⁶

The estimated proportion of Tower Hamlets residents (aged 18+) who report never having drunk alcohol

Around 400 of an estimated 3,400 dependent

Alcohol related harm remains high with a high degree of

Alcohol and Young People

Admission rates in younger residents (15-24) are lower than in London and England

Rates of alcohol-specific conditions in under 18's has been decreasing since 2011.

(Source: Tower Hamlets substance Misuse Needs Assessment 2017/18)

Our Response So Far

Our last Substance Misuse Strategy set out how we would work with our partners to reduce drug and alcohol problems in the borough between 2016 and 2019.

Some of our main successes were

Reduction in the number of drug related deaths from 5.6 per 100,000 population to 3.5 per 100,000 or 26 deaths (2016 to 2018) despite the increasing rate of deaths across England

Launched an innovative multi-agency co-located Exploitation and Gangs Unit, praised by Ofsted in their 2019 inspection: 'Highly vulnerable children at risk of exploitation, including those missing from home, school or care, receive effective, bespoke services, delivered sensitively by skilled and committed staff'

Increased the successful completion rates of non-opiate and alcohol service users between April 2016 and April 2019

Successfully targeted drug dealers through Operation Continuum resulting in 367 arrests for drug offences and drug supply, £891K in cash seized under the Proceeds of Crime Act, 56 vehicles seized in connection to the supply of drugs and large quantities of class A and B drugs seized

Launched the Neighborhood Management Pilot, working with residents to tackle drug dealing, drug use and anti-social behavior in Spitalfields and Banglatown, Weavers, Bethnal Green and St Peters wards

Exceptional performance in hepatitis C and B screening, immunisation and treatment – with over 90% of all eligible service users

being tested for Hepatitis C and rates of hepatitis B immunisations being higher than the national average

Improved identification and support to children in families with substance misuse problems

Enabled women exit prostitution through the innovative project 'Beyond the Streets'

Improved the treatment provision for young people by integrating sexual health and substance misuse services

Piloted an innovative housing model Housing First which provided permanent housing and support to people in need to minimise the risk of relapse or homelessness in future

Expanded our Drug Interventions Programme to include targeting those who are involved in drug and alcohol related anti-social behaviour with the aim of supporting them into treatment.

Launched Chat Health – anonymous drug, alcohol and sexual health support for local young people

Achieved national recognition by Local Government Chronicle for UK Team of the year for the Substance Misuse Service

Delivered evidence-based universal and targeted parenting programmes such as Moving Parents and Children Together ('M-PACT')

Launched 'Drink Coach', the on-line Alcohol Identification and Brief Advice screening tool – helped residents screen themselves for alcohol-related risk levels

Commissioned a primary care drug and alcohol support service offering comprehensive health checks to those in treatment

Commissioned a primary care service for the homeless population to better meet their physical and mental health needs.

Overview priorities and what we want to achieve

Priorities

What do we want to achieve?

What difference will it make?

Early intervention and prevention

- Avoid or delay the initiation of young people into substance misuse
- Avoid the progression to drug dependence in young people or adults who have already experimented with drugs
- Ensure individuals and communities know about the risks associated with substance misuse and where to get help
- Identify young people and vulnerable adults at risk of drug use or drug dealing or associated criminal or sexual exploitation at an earlier stage
- Reduce the harms to children growing up in families with parental substance misuse
- Work closely with communities to understand and tackle substance misuse
- Create high quality safe places in Tower Hamlets by integrating crime prevention solutions into the design of high streets, new developments, existing properties and the public realm

- Fewer young people will report that they have used drugs and /or alcohol
- Families and young people will get the support that they need earlier
- More families will have completed evidenced based parenting programmes
- More young people will be referred into the young people’s treatment service (Safe East) earlier and from non- criminal justice services
- More residents will know where to get help for substance misuse problems
- Residents will feel they are part of the solution
- Our high streets and neighborhoods will be designed with crime prevention built in

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Evidence based Treatment and Recovery support

- Increase the number of people who successfully complete drug and alcohol treatment programmes and ensure that treatment services address the diverse needs and groups within Tower Hamlets
- Improve the mental and physical health of those with substance misuse problems
- Support families, carers and young people affected by substance misuse
- Encourage healthier drinking behaviours
- Reduce the number of drug and alcohol related deaths
- Improve the social integration and treatment of residents with mental health and substance misuse care needs
- Strengthen routes into employment and stable housing for people in recovery from drug and alcohol issues
- Better identify and support victims of domestic abuse within substance misuse treatment services

- Tower Hamlets will be in the top quartile range for successful substance misuse treatment completions
- Drug related deaths will have reduced to below the London average
- More people who successfully complete treatment will be in paid or voluntary employment and stable housing
- More domestic abuse victims in need of substance misuse treatment will be referred into treatment
- More victims of domestic abuse in substance misuse treatment services will be referred to domestic abuse support services
- More residents psychological and physical health will improve as a result of being in treatment
- The stigma associated with substance misuse will be reduced
- Hostel provision will be improved and there will be less impact on the community.

Reducing drug and alcohol related crime and anti-social behaviour

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- Disrupt drug markets and reduce the visibility of open drug markets and open drug use
- Reduce resident concerns about people using or dealing drugs
- Reduce resident concerns about people being drunk or rowdy in public places
- Create responsible drinking environments
- Better understand drug markets and how to effectively deploy resources
- Increase the number of people entering treatment through the criminal justice route and through use of use of civil/criminal orders
- Reduce drug related activity in and around housing estates leading to an increase in residents perception of safety
- Identify at an early stage vulnerable persons being exploited by substance misusers and drug dealers in their home
- Better identify perpetrators of domestic violence and ensure referral to behavior change programmes and substance misuse programmes where indicated

- There will be more arrests and charges for drug offences and drug supply and increases in cash seized under the Proceeds of Crime Act
- Increases in the amount of Class A and B drugs seized
- Increases in vehicles seized in connection with the supply of drugs
- More people will be referred into and complete treatment from the criminal justice route e.g. the Drug Interventions Programme and the Specialist Substance misuse Investigation Team.
- Re- Arrest rates of the Drugs Intervention and integrated Offender Management Cohort will be reduced
- Fewer residents will report feeling concerned about crime and anti-social behaviour
- Fewer residents will report feeling concerned about drug use and drug dealing in their local area.
- Fewer residents will report feeling concerned about people being drunk or rowdy in their local area
- Perpetrators of domestic abuse will be referred to behavior change programmes and treatment services at an earlier stage

Priority 1

Early intervention and prevention

Why it's important

Drug and alcohol prevention initiatives play an important part of a comprehensive and holistic response to substance misuse and may be relevant to people across different age groups and at different stages of drug use. However, there is strong evidence that early intervention initiatives can prevent or delay the initiation into substance misuse by young people and that these interventions should start as early as possible, including before a child is born. Substance misuse during pregnancy can result in low birth weight or impaired brain development and at later stages of a child's development; behavioral, emotional or cognitive problems can emerge²⁷. Further, parental substance misuse (or 'hidden harm')²⁸ can cause serious harm to children at every age, from conception to adulthood. Public Health England estimates that up to 2,536 children are living in households with adults who have a substance misuse problem in Tower Hamlets. Enabling parents to access effective substance misuse treatment is therefore one way of reducing harms to the child.

A number of studies indicate that early initiation into cannabis use is associated with a greater likelihood of dependence in adulthood, poor educational outcomes, impaired cognitive functioning and psychopathology, which in the longer term can influence employability. There is also overwhelming evidence that high potency cannabis and daily use is associated with a higher incidence of psychotic disorder²⁹. Given the ready availability of high potency

cannabis in London and prevalence of cannabis use in young people's treatment services in Tower Hamlets, this could have important implications for the future mental health of young people in the borough.

As we know the role that drugs play in the exploitation of young people and vulnerable adults, early intervention and prevention are also important in minimising the risk of people being sexually or criminally exploited, for example through County Lines. Local data indicates that out of 149 anti-social-behaviour warnings issued for dealing cannabis 88 were issued to young males aged 15-21 and 23% of this cohort were repeat offenders (2016-18)

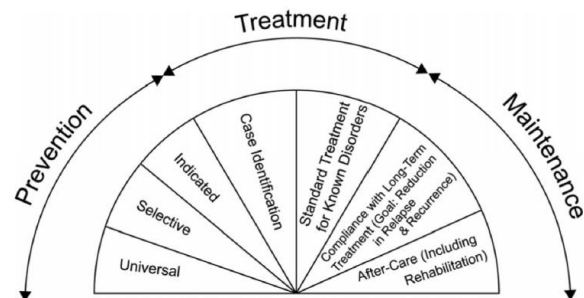


Figure 1 The Institute of Medicine model of prevention (1994; 2009)

Prevention models

Models of prevention vary according to the target group and seek to reach people of different age groups and with different levels of drug dependency. They generally fall into the following models: universal, selective or targeted and indicated. These models are discussed below.

Universal

These are strategies that address entire populations (e.g. schools and local community) regardless of level of risk or propensity for drugs use. Examples include mass media campaigns and school curricula.

Selective or targeted

Selective or targeted prevention focuses on groups that may be more vulnerable to developing substance misuse problems such as children looked after. These models of prevention also target individuals who already use drugs and aim to reduce harm and/or avoid progression into more harmful use. Examples include interventions for club-drug users in night clubs.

Indicated

Indicated prevention focuses on people who already use substances, but who may not be dependent. Examples include workplace interventions to encourage drinking at safe levels.

Environmental, Taxation and Pricing Policies

Environmental prevention is also an important component of any prevention activity. Examples include: reducing the density of alcohol outlets in order to control consumption and using planning and development control processes to identify opportunities to design out crime in new developments and improve feelings of public safety.

Pricing and taxation responses, which have been particularly effective in tobacco control internationally and nationally are now also looking promising in the area of alcohol harm reduction. For example, Scotland

introduced minimum unit pricing for alcohol in 2018 and the results of the immediate impact of this policy looks promising, with reductions in the amount of alcohol being purchased by households that were buying the most alcohol³⁰. Other countries have introduced initiatives such as drug consumption rooms and there is evidence³¹ that these have reduced drug-related deaths, public drug use and associated anti-social behavior and are an important component of an evidence-based harm reduction approach.

Addressing wider determinants

Prevention interventions are not necessarily drug or alcohol specific. Research³² tells us that early language acquisition plays an important role in the health, wellbeing and emotional resilience of a child and ability to form a secure attachment³³. This is now recognised at a national and local level and is an important component of the Tower Hamlets approach to preventing vulnerability to future drug and alcohol dependency in adulthood.

We recognise that drug and alcohol prevention responses need to be accompanied by effective treatment and recovery support and should be embedded in strategies that support development across the life course and influence the wider determinants of health.

Priority 2

Evidence based Treatment and Recovery support

Why is this important

Tower Hamlets has a significant drug and alcohol problem and we want to ensure that everyone that could benefit from being in drug or alcohol treatment does so.

Our Substance Misuse Needs Assessment tells us that certain groups are under-represented in our treatment services, including the Somali community where the use of khat is still prevalent, men who have sex with men and who are involved in chemsex, lesbian and bi-sexual women in whom the use of alcohol is higher than the general population, people living in hostels and women involved in street based prostitution.

There is also scope to improve the partnership services response to those experiencing domestic abuse who have substance misuse issues by supporting them to access treatment. We also want to increase referrals into young people's treatment from a wider range of partners such as accident and emergency departments, as well as schools. This is important because the main referral route is via the Youth Offending Team, by which time young people are already engaged in criminality alongside their substance misuse.

The rate at which people successfully complete treatment is an ongoing and significant challenge across the UK. This rate has also decreased nationally and locally. This is in part due to the complex needs of an older cohort of users and lower completion rates overall for homeless people or people living in hostels who tend to be opiate users. Investment in drug and alcohol treatment services not only saves

lives but also reduces the economic and social costs of drug and alcohol related harm. Specialist drug treatment has been shown to reduce offending and opiate substitute treatment is associated with reductions in drug use, injecting and mortality. Community-based needle and syringe programmes are associated with reduced rates of HIV and hepatitis C³⁴. There is also a sound evidence base for alcohol treatment³⁵ and population level interventions such as MUP, restricting availability of licensed premises, hours and days of sale and regulating alcohol marketing³⁶. The Alcohol Health Alliance is also pushing for raising the duty across alcoholic drinks which would encourage reduced drinking for the whole population and not just those who are drinking dependently as is the case with MUP.

Tower Hamlets has a comprehensive drug and alcohol treatment system for adults, known as 'Reset', and a separate service for young people (11-19) called 'Safe East', which combines substance misuse and sexual health provision. We also have a primary care service for people in treatment and specialist primary care interventions for the homeless population. We need to make the necessary changes to our treatment system to ensure equality of access for all. At the time of writing, our adult treatment services have just been recommissioned following an extensive needs assessment, co-production with service users and consultation with a broad range of stakeholders.

For treatment to be effective it also needs to include access for people in recovery to education, training, employment and housing as part of their recovery package. This often proves challenging as many

employers will not take on people who may have a criminal record or a history of substance misuse. Therefore, developing routes into employment, volunteering and training along with more sustainable housing options such as Housing First is a key priority over the life of the strategy.

Priority 3

Reducing drug and alcohol related crime and anti-social behaviour

Why this is important?

Tower Hamlets has a significant open drug market that generates anti-social behavior, violence and acquisitive crime. We know this causes considerable distress to residents. The most recent resident survey in 2019, for example, revealed that community safety was a top concern for residents with 67% of respondents reporting that people using or dealing drugs was problem in their area and 48% reporting that people being drunk and rowdy in a public place was a problem - both of which show an upward trend since 2016. Dissatisfaction rates are higher in the most recent Mayors Office for Policing and Crime Public Attitude Survey with 87% of respondents reporting that people using or dealing drugs in their area is a problem, and 50% reporting that people being drunk or rowdy is a problem. Reducing drug and alcohol related crime and anti-social behavior is of significant importance to the success of this strategy and residents feelings of overall safety.

We need to understand what we need to do to address resident concerns and to better understand more about the link between the supply of class A and B controlled drugs and violent crime, criminal exploitation and factors which drive local open drugs markets. We are developing a Drugs Problem Profile this year which will help start that process. We will also be exploring opportunities for joint operations with City Police to target cross borough drug dealing.

Substance misuse also plays a part in other types of violence such as domestic abuse,

currently addressed in the Violence Against Women and Girls Strategy³⁷, serious youth violence including knife crime and criminal exploitation of young people to sell drugs across County Lines which is a growing problem. Young people 'responsible' for protecting the line supply are often exposed to routine and extreme violence, sexual violence and coercion. This often leads to more extreme violence, self-medication with illegal drugs and alcohol. This will be more fully addressed in a forthcoming partnership strategy³.

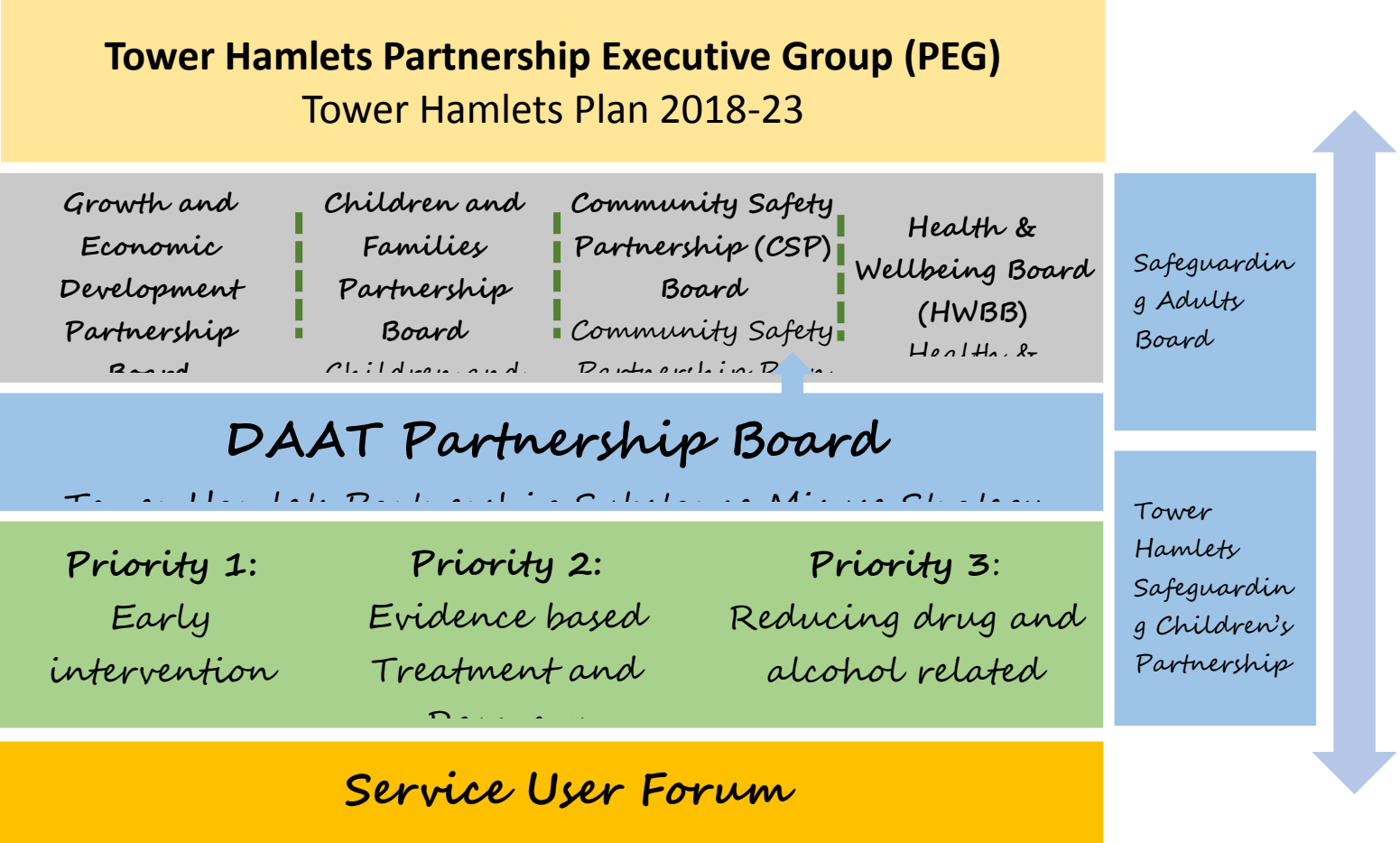
We will continue to crack down on drug dealing through Operation Continuum our joint multi-agency initiative and to reduce drug related re-offending through our co-located integrated offender management team. Our new specialist substance misuse investigation team will specifically target those who are committing drug or alcohol related anti-social behavior with the aim of supporting people into treatment.

We are also interested in exploring new ways of reducing the open use of drugs in our community. Our licensing team will be focusing on compliance with the licensing standards through the use of inspection and will review the current cumulative impact zones over the life of the strategy.

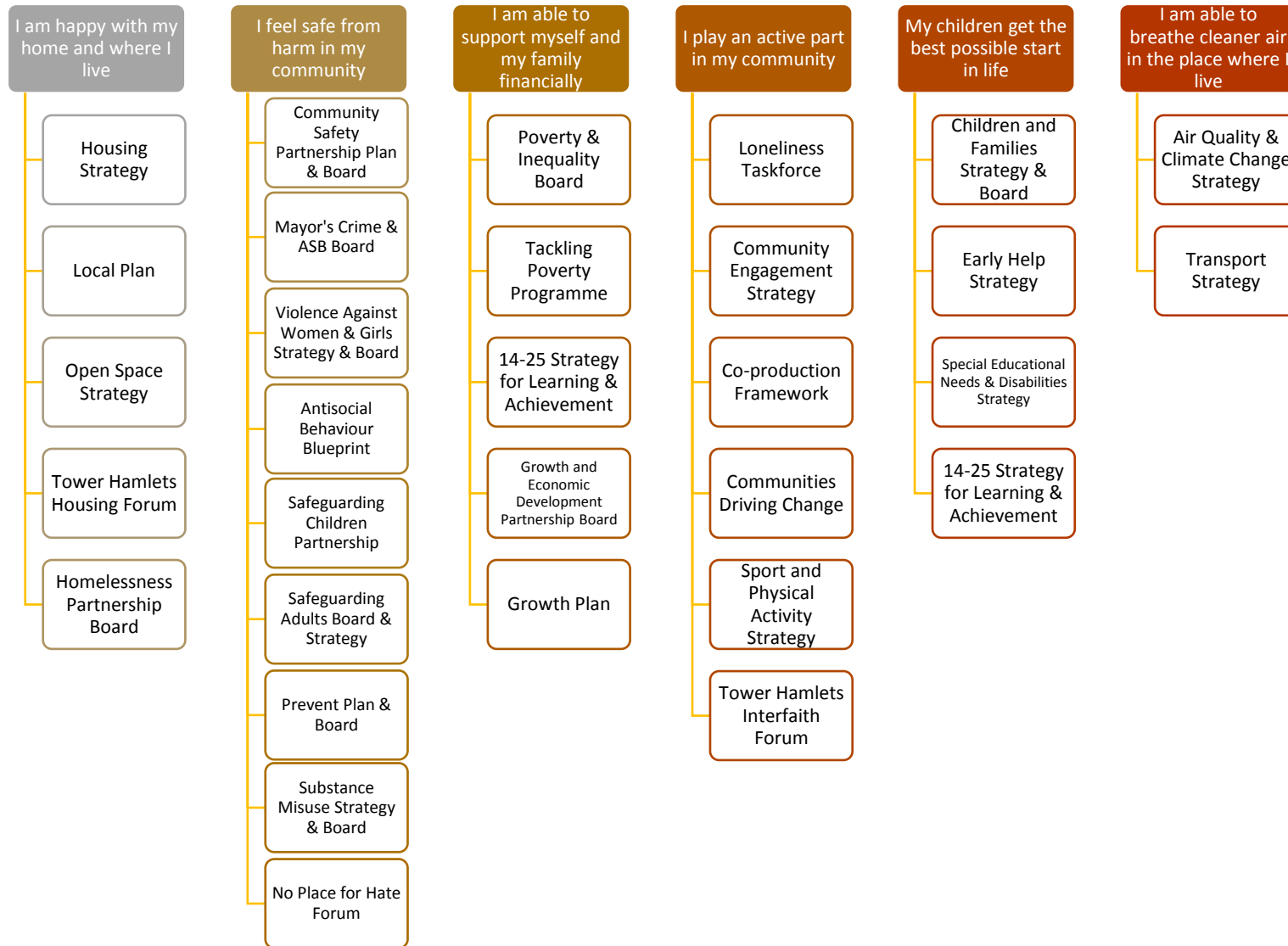
³ Violence, Vulnerability and Exploitation Strategy

Monitoring and Implementation

Accountability for delivery of this strategy rests with the Community Safety Partnership. The 3 priority work streams will report into the Drug and Alcohol Action Team Board, who in turn report into the Community Safety Partnership. The Safeguarding Adults and Tower Hamlets safeguarding Children's Partnership provide the necessary safeguarding framework.

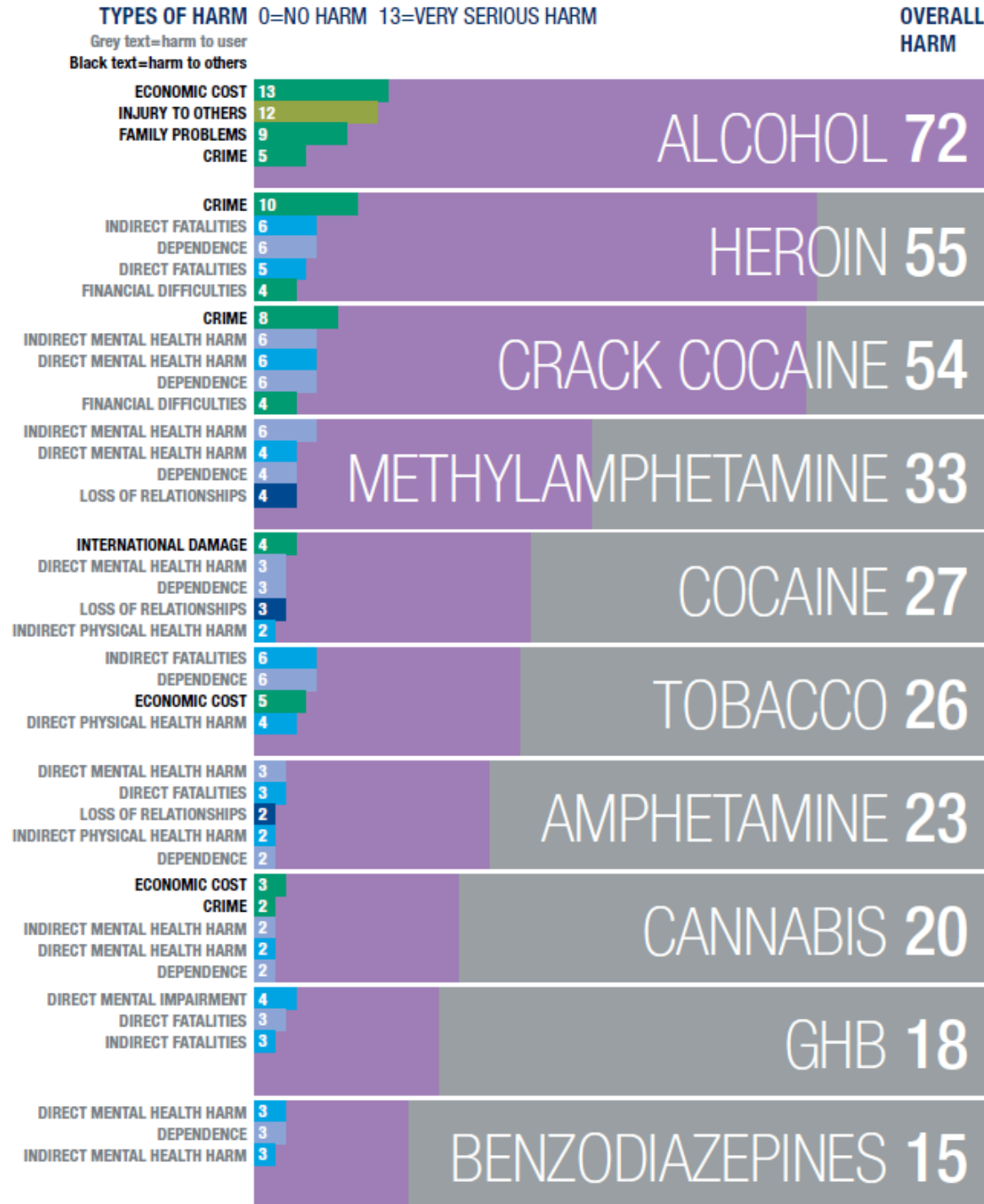


Appendix 1 Strategies programmes and works to address the wider determinants of health:



Appendix 2 – Evidence based drug harm profiles

The top 10 most harmful drugs and the harms that account for at least 50% of their overall harm



Based on the model reported in Nutt, D. J., King, L. A., Phillips, L. D., & on behalf of the Independent Scientific Committee on Drugs. (2010). Drug harms in the UK: a multicriteria decision analysis. *The Lancet*, 376(1558-65).

Appendix 3 – Alcohol structured advice tool

This is one unit...

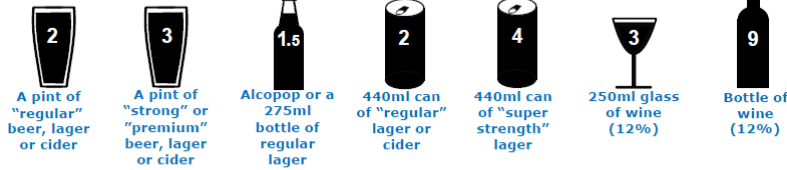
For more detailed information on calculating units see - www.nhs.uk/Livewell/alcohol/Pages/alcohol-units.aspx



How many units did you drink last week?



...and each of these is more than one unit



There is no completely safe level of drinking and drinking even small amounts of alcohol can incur risk in certain circumstances

For example, with strenuous exercise, operating heavy machinery, driving or if you are on certain medications.

If you are pregnant or planning a pregnancy, the safest approach is not to drink alcohol at all.

Drinking in pregnancy can harm the baby, with the more you drink the greater the risk.

The risk of harm to the baby is likely to be low if a woman has drunk only small amounts of alcohol before she knew she was pregnant or during pregnancy.

Score	Risk	What this means	Common Effects
1-4 on AUDIT-C* or 1-7 on AUDIT**	Low risk drinking	Adults who don't regularly drink more than 14 units per week, spread over three or more days, are at low risk of harm from drinking.	<ul style="list-style-type: none"> • Increased relaxation • Sociability • Sensory enjoyment of alcoholic drinks
5-7 on AUDIT-C* or 8-15 on AUDIT**	Increasing risk drinking	Drinking in this way raises your long-term risk of ill health.	Progressively increasing risk of: <ul style="list-style-type: none"> • Low energy • Relationship problems • Depression • Insomnia • Impotence • Injury • High blood pressure • Breast, mouth and throat cancers • Alcohol dependence • Liver disease
8-10 on AUDIT-C* or 16-19 on AUDIT**	Higher risk drinking	Drinking in this way is likely to be affecting your health or wellbeing in some way already.	
11-12 on AUDIT-C* or 20-40 on AUDIT**	Possibly dependent	Your drinking may have become quite problematic and further assessment by an alcohol specialist is advised.	

This leaflet is based on the "How Much Is Too Much?" Simple Structured Advice Intervention Tool, developed by Newcastle University and the Drink Less materials originally developed at the University of Sydney as part of a W.H.O. collaborative study.

Download this alcohol advice tool from <https://app.box.com/v/CQUIN-structured-advice-tool>

*Short 3 question AUDIT questionnaire. **Full 10 question AUDIT questionnaire

Glossary

Acquisitive Crime is defined as an offence where the offender derives material gain from the crime. Examples include shoplifting, burglary, theft and robbery. It is often associated with class A drug use.

Adverse Childhood Experiences Adverse Childhood Experiences (ACEs) are stressful events occurring in childhood including

- domestic violence
- parental abandonment through separation or divorce
- a parent with a mental health condition
- being the victim of abuse (physical, sexual and/or emotional)
- being the victim of neglect (physical and emotional)
- a member of the household being in prison
- growing up in a household in which there are adults experiencing alcohol and drug use problems. The term was originally developed in the US for the Adverse Childhood Experiences survey which found that as the number of ACEs increased in the population studied, so did the risk of experiencing a range of health conditions in adulthood. There have been numerous other studies which have found similar findings including in Wales and England. ACEs are when children are exposed to prolonged stress in the absence of protective relationships.

County Lines is a term used when drug gangs from big cities expand their operations to smaller towns, often using violence to drive out local dealers and exploiting children and vulnerable people to sell drugs. These dealers will use dedicated mobile phone lines, known as 'deal lines', to take orders from drug users. Heroin, cocaine and crack cocaine are the most common drugs being supplied and ordered. In most instances, the users or customers will live in a different area to where the dealers and networks are based, so drug runners are needed to transport the drugs and collect payment.

Chemsex is a term commonly used by Gay men and Men who have sex with Men (MSM) to describe the use of certain drugs in a sexual context. It is a very specific form of drug use and is defined by the use of three drugs ('chems'): Methamphetamine (Crystal/Crystal Meth/Tina/Meth). Mephedrone (Meph/Drone). Gammahydroxybutyrate/Gammabutyrolactone (GHB/GBL, G, Gina)

Drug Consumption Rooms - medically supervised facilities where injecting drug users can inject their illegally obtained drugs and take them in a medically supervised and hygienic environment DCR's can also include smoking or other routes of administration.

Housing First is an international evidence based approach which uses independent, stable housing as a platform to enable individual with multiple complex needs begin recovery and move away from homelessness.

Where to get Help

Local support

Beyond the Street

UK charity working to end sexual exploitation by Creating Routes Out through working directly with women
Tel: 0300 302 0762

Domestic Abuse

If your partner, ex-partner or family member is making you scared Or threatening you, this could be domestic abuse. **Call 0207 364 2448/7957 for advice or the National Domestic Violence Helpline on 0808 2000 247 which is open 24 hours a day 7 days a week.**

Drink Coach

Take the Alcohol Test to see how risky your drinking is, download our free DrinkCoach App to track your drinking.
<https://drinkcoach.org.uk/alcohol-test>

Drug Interventions Programme

Support for substance misusing clients involved in the Criminal Justice System.
Tel: 020 7364 4459
Out of hours: 0800 389 4442

Early Help Hub

A single point of access for the public, those working with children, young people and their families. Offers support as soon as problems start to emerge.
Tel: 020 7364 5006 or access the link for Online Enquiry Form
<https://bit.ly/2AA2WNY>

Health E1 - Homeless Medical Centre.
Currently running a daily walk-in clinic- **call 020 7247 0090 for opening times**

Housing Options

To make a homeless application visit the Housing Options Service
Albert Jacob House
62 Roman Road
Bethnal Green
London E2 0PG
Tel: 020 7364 5000 for opening times

Reset Outreach & Referral Service

A route into drug and alcohol treatment, safe and non-judgmental advice, Support Groups, 1 2 1 Support and signposting to other support services
Tel: 0800 802 1860 or visit: The Dellow Centre 82 Wentworth Street, E1 7SA

Reset - Adult Substance Misuse Treatment Service

Free, confidential drug and alcohol treatment for adults, whole family support, parenting programmes
Tel: 020 3889 9510
reset.towerhamlets@cgl.org

Safe East - Young People's Substance Misuse and Sexual Health Service

A free, confidential health and wellbeing service for children and young people who need support around drug and alcohol use and/or sexual health to the age of 19 (up to 25 if you are in care, have special educational needs or a disability) **Tel: 020 3954 0091**
compass.towerhamletsyphws@nhs.net

Street Link

Concerned about someone over the age of 18 that you have seen sleeping rough? you can use this website to send an alert to

Street Link
<https://www.streetlink.org.uk/>
UK/ or phone **0300 500 0914**

National Support/Information

Adfam

National UK charity working to improve support for those affected by someone else's substance use
Tel: 020 3817 9410 (please note this is not a helpline -)
By email admin@adfam.org.uk
www.adfam.org.uk

Alcoholics Anonymous

www.alcoholics-anonymous.org.uk

Al-Anon Family Groups

www.al-anonuk.org.uk

Cocaine Anonymous

www.cauk.org.uk

Families Anonymous

www.famanon.org.uk/meetings

Information on club drugs/festivals

<http://vitalinfo.org.uk>

Narcotics Anonymous

www.ukna.org

Talk to Frank

www.talktofrank.com

SMART Recovery

www.smartrecovery.org.uk/meetings

LGBT

Antidote at London Friend

Antidote is the UK's only LGB&T run and targeted drug and alcohol support service. Tel: 020 7833 1674 for opening times 86 Caledonian Road, London, N1 9DN.

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- ³³ Leadsom A, Field F, Burstow P, Lucas C. The 1001 Critical Days – The Importance of the Conception to Age Two Period: A cross Party Manifesto. Parent Information Partnership (UK) 2013 Valanis, B et al, (2013) Sexual orientation identity in relation to smoking history and alcohol use age 18/19: cross-sectional associations from the Longitudinal study of Young People in England (LSYPE), BMJ Open UK. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3758978/>
- ³⁴ Evidence review on drug misuse treatment published – PHE January 2017 - <https://www.gov.uk/government/news/evidence-review-on-drug-misuse-treatment-published>
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- ³⁶ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/733108/alcohol_public_health_burden_evidence_review_update_2018.pdf
- ³⁷ Tower Hamlets VAWG strategy https://www.towerhamlets.gov.uk/Documents/Community-safety-and-emergencies/Domestic-violence/VAWG_Strategy_2019_2024.pdf

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<p>Cabinet</p> <p>27 November 2019</p>	 <p>TOWER HAMLETS</p>
<p>Report of: Denise Radley, Corporate Director of Health, Adults and Community</p>	<p>Classification: Unrestricted</p>
<p>Award of contracts for the support service in three hostels for the single homeless</p>	

Lead Member	Councillor Amina Ali, Cabinet Member for Adults, Health and Wellbeing
Originating Officer(s)	Warwick Tomsett, Divisional Director, Integrated Commissioning
Wards affected	All wards
Key Decision?	Yes
Forward Plan Notice Published	24/09/2019
Reason for Key Decision	Financial Threshold and Impact on Wards
Strategic Plan Priority / Outcome	Strong, resilient and safe communities Better health and wellbeing

Executive Summary

The delivery of the Hostels Commissioning Plan for 2016 – 2019 is complete and has resulted in significant changes to the hostel sector locally. It remains important, however, to continue the re-shaping of support services over the coming years to ensure that they continue to be as responsive and relevant as possible to vulnerable residents. Key drivers for change include:

- The demand for hostel services and the needs of current hostel residents are changing, which needs to be taken into account in the design of support services to be delivered from hostels in the future.
- The contracts for 3 out of 7 hostel services are due to expire in March 2020 and new contracts are therefore required.

This report seeks approval to directly award contracts for the provision of the support services in three hostels, all of which are in the ownership of Providence Row Housing Association (PRHA). Detail about the value for money case that supports the proposed direct awards is set out.

Recommendations:

The Mayor in Cabinet is recommended to:

1. Agree to exempt Providence Row Housing Association (PRHA) for up to 3 years from 01 April 2020 from any tendering exercise relating to provision of support services at Edward Gibbons House, Providence House and Daniel Gilbert House in recognition of:
 - PRHA capital investment of £101k to improve the quality and design of the hostels buildings via increased provision of:
 - medical rooms,
 - catering facilities,
 - wet rooms/rooms suitable for residents with restricted mobility
 - PRHA revenue investment to better respond to the changing needs of Service Users via provision of:
 - homeless specific palliative care and support training
 - AQA accredited Safeguarding training
 - clinical psychologist support
2. Authorise the Divisional Director, Legal Services to execute all necessary contract documents in respect of the awards of contracts referred to at recommendations 1 above
3. Note the specific equalities considerations as set out in Paragraph 4.

1 REASONS FOR THE DECISIONS

- 1.1 To ensure the continuing provision of support services in the three hostels referenced in the report following the expiry of existing contracts.

2 ALTERNATIVE OPTIONS

- 2.1 The Mayor in Cabinet could decide that there is insufficient justification to directly award contracts to Providence Row Housing Association in respect of Edward Gibbons House, Providence House and Daniel Gilbert House and direct officers to subject those services to a competitive procurement process. This would put at risk the additional capital and revenue investment proposed by Providence Row Housing Association.

3 DETAILS OF THE REPORT

- 3.2 The key drivers of our strategic approach to the delivery of hostel services over the next three to five years are:

- The need to deliver services which remain responsive to the changing needs of homeless, vulnerable people in Tower Hamlets. Research undertaken by officers during 2019 has identified that:
 - both homeless people placed in hostels and rough sleepers are rapidly and prematurely becoming frail;
 - the average age of hostel residents in Tower Hamlets increased from 39 in 2015/2016 to 44 in 2017/2018 and this increase is mirrored by national trends;
 - 23 hostel residents passed away between April 2015 and August 2018. The average age at the point of death was 49;
 - the average life expectancy of a rough sleeper in the UK is 47 for male and 42 for female.
 - The need to review and re-design hostels buildings and review support services as commissioned in 2016/2017 to ensure that:
 - they continue to provide high quality support that meets the current and future needs of hostel residents, including the provision of level access wet room facilities for residents with restricted mobility;
 - generic support is enhanced by provision of onsite specialised health and care services including bespoke intermediate and long term home care, palliative and end of life care,
 - multidisciplinary, personalised, individual support plans for hostel residents are enhanced by the on-site provision of physical and mental health services enabled via provider funded capital works such as the provision of medical rooms.
 - The requirement to re-commission three hostel services from April 2020 as a result of the current contracts coming to an end in March 2020.
- 3.3 It is proposed that the funding envelope for the three hostels for which a direct award of contract is recommended be maintained at £1,312,808 per annum in order to ensure that best value continues to be achieved.
- 3.4 In order to deliver the necessary physical improvements to Edward Gibbons House, Daniel Gilbert House and Providence House as outline above, PRHA are proposing to invest a total of £101k, which is broken down as follows:
- 3.4.1 **Edward Gibbons House:** £43,200

Refurbishment of the shared toilet and bathroom facilities in line with requirement to maintain CQC registration and respond to the increasing needs of those with mobility issues. The challenge here is that mobility needs of the users of these facilities vary so flexible adaptations are required. The

existing bathrooms will be converted into wet rooms so that those on crutches, Zimmer frames or in wheelchairs will be able to use them. All toilets will be upgraded to increase accessibility.

3.4.2 **Providence House: £28,080**

Refurbishment of the Ground floor kitchen to enable catering services to be provided to some of the residents who are unable to provide for themselves. Also one room will be converted into a bespoke medical room (following the model successfully introduced at Edward Gibbons House) to enable on-site satellite medical services including district nurses, GPs and screening services.

3.4.3 **Daniel Gilbert House: £29,280**

Refurbishment of one room to create a medical room to enable on-site satellite medical services including district nurses, GPs and screening services (following the model successfully introduced at Edward Gibbons House).

Additional security measures (CCTV and reinforced doors) in the communal areas to address concerns about lack of security, anti-social behaviour and compromising fire safety caused by ongoing vandalism because of the increasingly complex needs and challenging behaviour of the residents. This will enable the scheme to continue to accept referrals of high risk residents without compromising the safety of others.

- 3.5 If the direct award of contracts is approved, the completion of the above works within 9 months of contract commencement will be made a condition of contract in order to provide assurance that the works will be undertaken.

4 EQUALITIES IMPLICATIONS

- 4.1 The proposed change in provision of hostel services has been considered in accordance with the public sector equalities duty to eliminate unlawful conduct under the Equality Act 2010 as set out at Section 149 of the Act. 'Due regard' have been given to the need to eliminate discrimination (both direct and indirect discrimination), harassment and victimisation and other conduct prohibited under the Act, and to advance equality of opportunity and foster good relations between those who share a 'protected characteristic' and those who do not share that protected characteristic.

5 OTHER STATUTORY IMPLICATIONS

- 5.1 Risk management: Hostels are increasingly being used to accommodate individuals with complex multi-morbidities and often chaotic lifestyles. There are, therefore, significant operational risks present on an ongoing basis. A key element of the Council's contract management activities is, therefore, focused on providers' risk management arrangements.

6 COMMENTS OF THE CHIEF FINANCE OFFICER

- 6.1 This report proposes to direct award 3 contracts for hostel provision currently held by Providence Row Housing Association, at an annual value of £1,312,808 for up to 3 years from 1 April 2020. The value is in-line with current and future budgeted expenditure. These services are funded by the council, and included within the current medium term financial strategy (MTFS). As part of the direct award it has been agreed Providence Row Housing Association will invest £101,000 of their own funding in capital works to enable physical improvements to the buildings within 9 months of contract award. This will need to be monitored to ensure delivery.
- 6.2 The paper also proposes a procurement exercise is undertaken for support services at Dellow Hostel, which are funded by the council. The current budgeted value of this provision is £464,137 per annum and is built in to the current MTFS. It is proposed the budget envelope for the re-procured service will be within this level of funding available. If the re-procured service is agreed at a lower value, the savings will support delivery of savings already agreed as part of the MTFS.

7 COMMENTS OF LEGAL SERVICES

- 7.1 The Council has a legal duty to obtain Best Value and to subject its expenditure to competition. Usually, subjecting expenditure to competition satisfies both legal duties provided a particular bid is evaluated on a blend of both quality and price. However, this is not the only way to demonstrate Best Value and also price is just one factor.
- 7.2 In many instances, Hostel provision is required as one of the Council's statutory functions and this is dependent upon the needs of the service user. The direct award of the contract as referred to in this report has the effect of driving up the efficiency and effectiveness of the hostel provision by increasing the quality of the accommodation through encouraging investment into the properties. Also, the existing cost is set to remain the same against rising cost of provision and therefore it appears that there is strong evidence to suggest that this arrangement does represent Best Value.
- 7.3 Many services users have the own right to remain in the residence, or at least that the Council is restricted from moving service users to different accommodation. This would restrict the effectiveness of any competition and the Council is legally bound by the principle of proportionality under European Law. In the circumstances therefore, a direct award may be considered proportionate.
- 7.4 However, the compliance with statute is dependent upon the realisation of the investment into the properties. The proposed agreement will ensure that the contractor is legally bound to provide the investment which will safeguard the Council's compliance with its statutory duties.

7.5 The report details a continuation of the existing services, albeit with improved quality of accommodation. Therefore, it is reasonable to assume that there will be little or no impact on persons who have a protected characteristic for the purposes of the Equality Act 2010

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</p> <p>27 November 2019</p>	
<p>Report of: Ann Sutcliffe, Place Corporate Director</p>	<p>Classification: Unrestricted</p>
<p>Adoption of the Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits</p>	

Originating Officer(s)	Marissa Ryan-Hernandez (Strategic Planning Manager) & Jane Jin (Plan Making Team Leader)
Wards affected	All wards

Executive Summary

The Local Plan sets out a vision, strategic priorities and a spatial planning policy framework for development in the Borough. Its purpose is to direct the determination of planning applications and positively plan for the development and infrastructure requirements to meet the needs of existing and future communities. The Local Plan has been through an extensive preparation process, including evidence base collection, public consultation and independent examination.

On 21 February 2018, full Council approved the Local Plan (submission version) to be submitted to the Secretary of State for an Examination in Public (EiP) (see Appendix 4). Upon Submission, the Secretary of State appointed an independent Planning Inspector to undertake the EiP which ran from 6 to 21 September and 11 to 12 October 2018. The Inspector’s Final Report (see Appendix 1) was received on the 20 September 2019 and has been published on the Council’s web site. The report concludes that the Local Plan is sound and legally compliant, subject to a number of modifications. The modifications were consulted on by the Inspector from 29 March to 9 May 2019.

It is now necessary to adopt the Local Plan 2031: Managing Growth and Sharing the Benefits (Local Plan) to ensure the Council has a robust and up-to-date spatial planning policy framework. Once adopted, the Local Plan will replace the adopted Core Strategy (2010) and Managing Development Document (2013).

Recommendations:

The Mayor in Cabinet is recommended to:

1. Note that the Local Plan has been subject to further amendments (following its submission to the Inspector in February 2018) as part of the independent public examination, as described in:
 - a. the Inspector’s Final Report (see appendix 1), and;

- b. schedule of main and additional modifications (see appendix 2).
2. Note the recommendation stated in the Inspector's Final Report.
 3. Refer the Report to the Full Council to formally adopt the Local Plan, including the modifications recommended by the Inspector and the additional minor modifications proposed by officers, in accordance with Section 23 of the Planning and Compulsory Purchase Act.
 4. To recommend to Full Council to Authorise the Corporate Director of Place to prepare and publish an Adoption Statement and the final Integrated Impact Assessment Report, in accordance with S26 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
 5. To recommend to Full Council to authorise the Corporate Director of Place in consultation with the Mayor and Lead Member for Planning, Air Quality and Tackling Poverty to make typographical amendments to the plan prior to its publication to improve cross-referencing (e.g. paragraph numbering, page re-numbering) and typographical errors.
 6. To recommend to Full Council to revoke the Council's current adopted Core Strategy (2010) and Managing Development Document (2013). It is recommended that the current adopted Plans are revoked following the statutory six week legal challenge period of the Local Plan adoption.
 7. Subject to adoption of the Local Plan by the Full Council, agree to revoke the following Council's supplementary/Interim planning documents (see appendix 3 for a full SPD review). These need to be removed as planning policy guidance to ensure an effective and efficient development management process. It is recommended that the current the following documents are revoked following the adoption of the Local Plan by the Full Council and following the statutory six week legal challenge period of the Local Plan adoption.
 - a. Wood Wharf Masterplan (2003)
 - b. Aldgate Masterplan (2007)
 - c. Former Whitechapel Masterplan (2007)
 - d. Bishopsgate Goods Yard (2009)
 - e. Bromley-by-Bow Masterplan (2012)
 - f. Whitechapel Vision Masterplan (2013)
 - g. South Quay Masterplan (2015)
 - h. Millennium Quarter Public Realm Guidance Manual (2008)

1. REASONS FOR THE DECISIONS

- 1.1 The Local Plan is a statutory requirement as set out in the Planning and Compulsory Purchase Act 2004. Section 19 sets out specific matters to which the local planning authority must have regard when preparing a local plan. Regulations 8 and 9 of the Town and Country Planning (Local Planning) (England) Regulations 2012 prescribe the general form and

content of local plans and adopted policies maps, while regulation 10 states what additional matters local planning authorities must have regard to when drafting their local plans.

- 1.2 The Local Plan is necessary to ensure that an up-to-date planning framework is in place to support the borough's growth. The Local Plan will ensure:
 - a. new developments meet the needs of the borough and designed to the highest standards; and
 - b. key sites deliver infrastructure to support an increasing population – including new schools, health facilities and local parks.
- 1.3 On receipt of the Inspector's Final Report, the Council must consider whether to adopt the Local Plan. If the Council decides to adopt the Local Plan then it must accept the Inspector's recommendations if the plan is to be deemed 'sound' and have full weight.
- 1.4 The adoption of the Local Plan will provide the Council with updated and detailed policies and guidance to determine planning applications and manage development. The Local Plan has been developed to be consistent with the National Planning Policy Framework (2012) and the London Plan (2016).
- 1.5 The document will replace the Council's current Local Plan which consists of the adopted Core Strategy (2010) and Managing Development Document (2013). Although relatively recent documents, the introduction of new housing and job targets through the London Plan, along with recent changes to national planning policy and legislation requires the Council to bring forward a new Local Plan to manage increased growth and respond to emerging trends.

2. ALTERNATIVE OPTIONS

OPTION A: RETAIN THE EXISTING LOCAL PLAN

- 2.1 The current Local Plan has not planned for sufficient infrastructure such as schools, open space and transport to meet the needs arising from the borough's revised annual housing target and projected employment growth set out in the London Plan.
- 2.2 Without a new and up-to-date Local Plan in place, there is a risk that development will not come forward in a coordinated manner, making it difficult to deliver the social and physical infrastructure necessary to support the anticipated number of new homes and jobs. By not allocating sufficient sites, the borough could miss out on the benefits of growth to the detriment of local people.
- 2.3 The evidence on which the current Local Plan is based is becoming increasingly out-of-date. The National Planning Policy Framework and London

Plan would become default policies on matters not addressed within the existing Local Plan, meaning local circumstances would not necessarily be reflected to guide planning applications and decisions.

- 2.4 It also means that in some cases the Council's ability to successfully defend refusals at appeal would be compromised.

OPTION B: REJECT THE FINDINGS OF THE INSPECTOR'S REPORT AND RECOMMENDED SCHEUDLE OF MAIN MODIFICATIONS AND WITHDRAW THE LOCAL PLAN

- 2.5 The Inspector's main modifications are required to make the plan sound. The Local Plan cannot be legally adopted unless these changes are made. The Council does not have to accept these changes and could decide to withdraw rather than adopt the Local Plan. Subsequently, the Council can revisit the Local Plan to prepare a new plan. It should be noted this option would take approximately four years from inception through to adoption and incur significant costs. This represents an inefficient use of public funds and resources.
- 2.6 In addition to the cost, further delaying an up-to-date Local Plan would pose a significant risk to the long term growth and prosperity of the borough, as set out in paragraph 2.1 to 2.4.

3. DETAILS OF THE REPORT

Background

- 3.1 The Tower Hamlets Local Plan is the borough's key planning document and is a statutory requirement. It sets out the authority's policies (however expressed) relating to the development and use of land in their area. With a view to to guiding future growth and investment, as well as secure benefits from new developments, such as transport improvements, new open spaces and affordable housing. It covers a fifteen year period, from 2016 until 2031. More specifically, it sets out:
- a. a vision of what the borough will look and feel like in 2031;
 - b. a series of objectives and supporting actions on how the benefits of this growth can be shared across the borough;
 - c. a range of policies to inform and positively shape future development and investment decisions, such as new homes, jobs and supporting infrastructure;
 - d. a series of priorities and principles that will guide and inform the future development of the borough's individual places and key sites;
 - e. a map showing the designations such as protected open space and the sites where new development will take place; and
 - f. details on how we will implement and monitor these policies.

Local Plan Development Process

- 3.2 The Local Plan was prepared in accordance with the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012 which requires the Local Plan to be:
- consistent with the National Planning Policy Framework (NPPF) (2012) and the London Plan (2016);
 - underpinned by relevant and proportionate evidence base to inform content;
 - supported by options testing to explore alternative scenarios and implications of different policies or site allocations;
 - informed by a consultation and engagement process with the community and key stakeholders, including appraising the options of draft policies and site allocations;
 - supported by an Integrated Impact Assessment, which also includes the Habitat Regulations Assessment and Equalities Impact Assessment to review the policies and site allocations; and
 - examined in public by an independent Planning Inspector.

Consultation

- 3.3 The process for the preparation of the Local Plan is set out in the Council's Statement of Community Involvement (SCI). The report recommending submission to the SoS was considered by Members Advisory Board, Cabinet and full Council in February 2018. It outlined the extensive consultation and engagement process which was undertaken. The Tower Hamlets Local Plan process of preparation is summarised in table 1 below.

Table 1

Key stages	When	Stage	Purpose / nature of stage	Number of responses
Early engagement Our Borough, Our Plan: A New Local Plan First Steps'	January - February 2016	Regulation 18	<ul style="list-style-type: none"> Review of new and emerging policy and legislation, market changes, political priorities etc. Outline scope of the plan Key challenges / opportunities 	130 reps were received which contained 1,235 individual comments.
Preferred approach Tower Hamlets Draft Local Plan 2031: Managing Growth and Sharing Benefits	November 2016 - January 2017	Regulation 18	<ul style="list-style-type: none"> Draft version included policies and site allocations. Public drop-in events, area-specific workshops and bespoke meetings with specific groups (e.g. the Youth Council) Press and social media advertised 	103 reps were received which contained 908 individual comments.
Publication Tower Hamlets Draft Local Plan 2031: Managing Growth and Sharing Benefits	October – November 2017	Regulation 19	<ul style="list-style-type: none"> Formal comments were sought on the final draft Local Plan. In September 2017, Cabinet and Full Council gave approval to go out to formal consultation. Comments were focussed on soundness and legal compliance Public workshops Press and social media advertised 	126 reps were received which contained 948 separate comments

Submission Tower Hamlets Draft Local Plan 2031: Managing Growth and Sharing Benefits	Wednesday 28th February 2018	Regulation 22	<ul style="list-style-type: none"> Resolution of Cabinet and Full Council to submit plan to Secretary of State 	n/a
Examination	6 to 21 September and 11 to 12 October 2018.	Regulation 24	<ul style="list-style-type: none"> Examine the soundness of the Local Plan and make sure it adheres to the requirements set out in national policy and legislation. Consultation on the inspector's proposed main modifications Inspector's report into the soundness of the Local Plan 	25 reps were received on the main modifications which contained 67 separate comments

3.4 The Council has engaged constructively, actively and on an on-going basis with the relevant bodies in the process of preparing the Local Plan. The Council has also undertaken extensive consultation and engagement with the community in accordance with the Council's SCI and national legislation.

3.5 The consultation and engagement process has shaped and informed the development of the Local Plan. The Local Plan represents a collaborative approach between the Council and key external stakeholders (including statutory agencies, landowners and residents).

Submission

3.6 The Local Plan (submission version) was presented to full Council on 21 February 2018 for approval to submit to the Secretary of State. In accordance with regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Council submitted the Local Plan, including supporting evidence base, to the Secretary of State on 28 February 2018 to undertake an independent examination into the soundness of the document.

Examination

3.7 The Secretary of State appointed an independent Planning Inspector (Mrs Christa Masters) to conduct the independent public examination of the Local Plan to ensure it meets the requirements set out in national policy and legislation.

3.8 The examination hearing sessions took place over two stages (6-21 September and 10-11 October 2018). The structure of the hearings focused on specific topics that were determined by the Inspector for further examination. The hearings were attended by key representors, including landowners, GLA, English Heritage and representatives of the local community.

3.9 Officers from the Plan Making Team presented both verbal and written evidence (in some cases supported by Counsel) to demonstrate the

soundness of the Local Plan, with assistance from other service areas such as education, infrastructure, open space, housing, public health, waste, transport and enterprise. The hearing sessions were also open to the public. Organisations and individuals (e.g. developers, landowners and other stakeholders) who had responded to the regulation 19 consultation were also invited to take part in the hearing sessions.

- 3.10 Following the hearing sessions, the Planning Inspector proposed a number of changes (known as “main modifications”) to the Local Plan in the light of these discussions. Main modifications are changes the inspector deems necessary to make the plan sound.
- 3.11 The Planning Inspector invited comments on the main modifications between Monday 25 March and Thursday 9 May 2019. Comments were sought on the content of the main modifications (soundness) and the way in which they had been prepared (legal compliance).
- 3.12 Alongside these changes, comments were also invited on:
 - a. the proposed changes to the Policies Map (as a consequence of the main modifications); and
 - b. the appraisal of the social, economic and environmental impacts of the main modifications (known as the Integrated Impact Assessment).
- 3.13 Whilst not forming part of the consultation, officers proposed a number of additional modifications to improve the clarity of the Local Plan. A schedule of these changes is attached at appendix 2. None of these changes will fundamentally alter the substance or strategic direction of the Local Plan. Additional modifications are largely confined to typographical/grammatical amendments, factual updates, additional clarification or editorial changes to improve the clarity of the plan as a whole.
- 3.14 It should be noted that following the hearing sessions, National Planning Policy Framework (2012) was revised and published in July 2018 and updated in February 2019. National Planning Policy Framework (2019) includes a transitional arrangement in paragraph 214 whereby, for the purpose of examining the Plan, the policies in the 2012 National Planning Policy Framework applied. Therefore, throughout this report, National Planning Policy Framework (2012) is referenced.

Inspector’s Report

- 3.15 The Inspector’s Final Report (appendix 1) was received on the 20 September 2019. The Inspector concluded that, subject to a number of main modifications, the Tower Hamlets Local Plan (submission version) satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework as well as meeting all aspects of legal compliance and the duty to cooperate. It therefore provides

an appropriate basis to guide the future planning and development of the borough, subject the main modifications.

- 3.16 To adopt Local Plan, the Council is required to accept the Inspector's recommended main modifications in order to meet legal and statutory requirements to ensure the Local Plan is 'sound'. These main modifications, together with additional minor modifications that the Council consulted on are set out in appendix 2.
- 3.17 The Inspector's changes do not include any new policies, designations, targets or significant amendments to the content of the plan and the proposed development sites have been retained.
- 3.18 The Inspector's Final Report has been published on the Council's web site.

Next Steps

- 3.19 The proposal is for the full Council to formally adopt the Local Plan on 15 January 2020. The following timescales show the planned reporting cycle for formal adoption.
- 3.20 The main modifications and the additional modifications will be consolidated into a desktop version of the final Local Plan.
- 3.21 Subject to full Council adopting the Local Plan, it will be finalised and published on the Council's web site and made available in the borough's Idea Stores, libraries and planning reception at the Town Hall. The Local Plan will carry full weight in the determination of planning applications and will become part of the borough's development plan alongside the London Plan and any relevant neighbourhood plans.
- 3.22 The Council will need to prepare an Adoption Statement to accompany the Local Plan in accordance with regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Adoption Statement sets out:
 - a. date which the Local Plan was adopted;
 - b. modifications following the submission version (February 2018); and
 - c. notice that any person aggrieved by the process can make an application to the High Court within 6 weeks from the date of adoption.
- 3.23 Following adoption of the Local Plan there will be a statutory six week legal challenge period. The six weeks will commence from the date of adoption which will be the full Council meeting.
- 3.24 Under section 113 of the Planning and Compulsory Purchase Act, an application can be made within six weeks of adoption to the High Court to quash a Local Plan (either in whole or part). However, we can still put full weight on the policies in the plan during the challenge period.

- 3.25 In the event of such a challenge, a further report will be presented to Cabinet and full Council to provide a suitable update on the expected process and associated risks.
- 3.26 Following the challenge period, the current adopted policies within the Local Plan (Core Strategy (2010) and Managing Development Document (2013)) would need to be removed in order to facilitate an efficient planning policy framework. These policies will be deemed superseded following the adoption of the new Local Plan and the challenge period.

4. EQUALITIES IMPLICATIONS

- 4.1 In carrying out the function of preparing a Local Plan, regard must be given to the duty to eliminate unlawful conduct under the Equality Act 2010. The duty (as set out at section 149 of the 2010 act) requires the council, when exercising its functions, to have 'due regard' to the need to eliminate discrimination (both direct and indirect discrimination), harassment and victimisation and other conduct prohibited under the act, and to advance equality of opportunity and foster good relations between those who share a 'protected characteristic' and those who do not share that protected characteristic. The protected characteristics and groups are: age, disability, gender reassignment, pregnancy and maternity, race, gender, religion or belief, sexual orientation and marriage/ civil partnership status.
- 4.2 As the Local Plan is a Borough wide document that will potentially impact on all of those who live, work and visit the Borough. In order to consider the potential equalities impacts of these policies, the Council's Equalities Impact Assessment process was undertaken of the Local Plan. This is a two-stage approach to the analysis of equality issues and based on the Equality Analysis Quality Assurance Checklist, a Full Equalities Impact Assessment was not deemed necessary as the Local Plan exhibited due regard to the Council's Public Sector Equality Duty. The approach to this assessment was discussed with the Council's Senior Strategy, Policy and Performance Officer (Equality) officer at the time who confirmed that completion of the QA checklist was sufficient. The review of the Regulation 19 Draft Local Plan came to the same conclusion, as did the review following the main modifications of the Plan. Steps were taken to ensure due regard for the nine protected groups was embedded in the process to produce, and the policies of, the Local Plan as it continued to develop. There are policies in the Local Plan which, while not focussed on people who share one or more of the nine Protected Characteristics identified under the Equality Act 2010, could have significant positive effects. These include policies relating to housing, employment, transport and mobility and inclusive design. The provision of adaptable and accessible housing will bring positive outcomes for the disabled and others. The safeguarding and provision of accommodation for Gypsies and Travellers are also positive.
- 4.3 A suggestion arising from undertaking the Equality Analysis Quality Assurance Checklist at the Regulation 18 stage was that the officers considering consulting with or briefing other groups meeting during the

consultation period on the Draft Local Plan, e.g. groups identified in the Council's Single Equality Framework, e.g. Community Forums, Local Voices and other relevant local groups if they were meeting during the period over which the document was being consulted on. The Council agreed with this recommendation and undertook additional consultation at Regulation 18 stage. At the Regulation 19 stage, contacts were made with all groups contacted at the Regulation 18 stage. The approach to this assessment was discussed with the Council's Senior Strategy, Policy and Performance Officer (Equality) officer at the time who confirmed that completion of the QA checklist was sufficient. The review of the Regulation 19 Draft Local Plan has come to the same conclusion.

- 4.4 Equalities has been embedded into the policies of the Local Plan so that it is at the heart of the decision making process on the determination of planning applications. Part 3 of the Local Plan sets out a strategy for delivering sustainable growth across the borough, with a particular emphasis on ensuring that the built environment is accessible (especially to those with physical impairments) and promotes community safety and cohesion. This will help to ensure the continued delivery of 'One Tower Hamlets' - a place where people from all backgrounds are able to have their voice heard and share equal life chances.

5. OTHER STATUTORY IMPLICATIONS

- 5.1 This section of the report is used to highlight further specific statutory implications that are either not covered in the main body of the report or are required to be highlighted to ensure decision makers give them proper consideration. Examples of other implications may be:

- Best Value Implications,
- Consultations,
- Environmental (including air quality),
- Risk Management,
- Crime Reduction,
- Safeguarding.
- Data Protection / Privacy Impact Assessment.

Equalities

- 5.2 For the Local Plan, a screening opinion on the need to undertake a full Equalities Impact Assessment has been carried out as part of the Integrated Impact Assessment. This confirmed that a full Equalities Impact Assessment is not necessary because due regard is given to the council's Public Sector Equality Duty within the emerging Local Plan.
- 5.3 Policies on safeguarding and provision of accommodation for gypsies and travellers and the provision of adaptable and accessible accommodation will bring positive outcomes for different groups, including the disabled. For the regulation 19 consultation, a wide range of groups and organisations from the voluntary and community sector were contacted (including those identified in the council's Single Equality Framework) to invite them to participate in the

preparation of the Local Plan process. Among them included representatives from the youth council, faith groups, local business forums, black and ethnic minority groups, health organisations and the network of organisations representing disabled people. Officers will continue to work with the council's equalities team to ensure actions are undertaken to mitigate any impacts on the equality profile of those affected by the Local Plan.

Best Value Implications

- 5.4 Under section 3 of the Local Government Act 1999 the Council must 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 is in addition to the duty under section 13 of the Planning and Compulsory Purchase Act 2004 to carry out a review of planning policies. The new Local Plan will enable the council to continue to ensure that the delivery of housing, infrastructure and other new development is optimised, and that social, economic and environmental benefits continue to be secured and shared across the borough and beyond. The development of sites following the policies and guidance contained within the new Local Plan will generate section 106 and Community Infrastructure Levy (CIL) contributions, where relevant. This may include the delivery of new affordable housing, local enterprise and employment opportunities, public realm enhancements and transport infrastructure.

Environmental

- 5.5 Sustainability appraisal is a legal requirement for the preparation and development of a Local Plan. Under the Planning and Compulsory Purchase Act 2004, sustainability appraisals must comply with the requirements of a Strategic Environmental Assessment (SEA). The SEA ensures environmental issues are incorporated into the Local Plan and assessed in decision-making throughout the entire plan-making process. The sustainability appraisal will be submitted to the secretary of state alongside the new Local Plan as part of the Integrated Impact Assessment.
- 5.6 The Local Plan will help ensure a greener environment in a number of ways, including:
- protecting and enhancing areas of open space and water space;
 - promoting biodiversity;
 - managing the impacts of construction on communities;
 - reducing and minimising waste within developments;
 - promoting sustainable transport options, such as new pedestrian and cycle routes; and
 - ensuring new buildings and spaces meet the highest standards of environmental sustainability and design.

Risk Management

- 5.7 Throughout its preparation, the emerging Local Plan has been regularly

reported and presented to a number of internal groups that consider risk management issues and mitigation measures. These have included:

- Local Plan: Internal Stakeholders Group;
- Development and Renewal Directorate Management Team; and
- Corporate Management Team.

5.8 The Corporate Leadership Team approved a Project Initiation Document (PID) in May 2015. Officers have worked collaboratively across the relevant services on developing the new Local Plan and its evidence base through CLT and a Local Plan Internal Stakeholder Group. The Mayor of Tower Hamlets and Lead Member for Strategic Development and Waste have been briefed frequently on the new Local Plan, providing significant input into the development of the Local Plan.

Crime Reduction

5.9 The Local Plan contains policies that seeks to ensure the design of developments minimises opportunities for crime and disorder and creates a safer and more secure environment. In particular, development will be required to incorporate the principles of 'secured by design' to improve safety and perception of safety for pedestrians and other users, without compromising the ability to create aesthetic and functional public spaces, such as crowded places.

6. COMMENTS OF THE CHIEF FINANCE OFFICER

6.1 There are no direct financial implications emanating from this report which recommends the adoption of the Local Plan. All costs incurred in developing this plan have been incurred in previous financial years.

6.2 There will be future financial implications for both income and expenditure as a result of the adoption of this Local Plan and its implementation when making planning decisions. There is an expectation that these implications will be managed within existing resource allocations.

7. COMMENTS OF LEGAL SERVICES

7.1 The Local Government Act 2000 created the executive model of government whereby functions not reserved to Full Council are to be the responsibility of the Executive. Other functions and responsibilities are to be shared between Full Council and the Executive. Functions which are to be the shared responsibility of the Full Council and the Cabinet are those relating to the Council's policy framework and budget. Development Plans are a shared responsibility. In cases where there is shared responsibility the law (The Local Authorities Functions and Responsibilities Regulations 2000 as amended by the 2005 Regulations in relation to Planning) provide that the decision making is shared so that the Executive makes proposals for Full Council to agree, reject or send back to Cabinet for different proposals.

- 7.2 Section 13 of the Planning and Compulsory Purchase Act 2004 requires the local planning authority to keep under review the matters which may be expected to affect the development of their area or the planning of its development. By section 17(3) of the same Act the authority must keep under review their local development documents having regard to the results of any review carried out under section 13. Paragraph 2.2 of the report sets out the outcome of the reviews.
- 7.3 The Procedure for preparing and adopting a local plan is set out in section 19 to 24 of The Planning and Compulsory Purchase Act 2004 and part 6 of the Local Plan Regulations 2012. In preparing the plan the Council has to have regard to the matters set out in section 19(2) of The Planning and Compulsory Purchase Act 2004, among other matters. For a London Borough this list of matters includes, having regard to the London Plan, national policies and other LDDs adopted by the Council. This Report sets out how the Council has met these obligations. The NPPF sets out in detail other matters which ought to be addressed in local plans. For the purposes of this Local Plan the relevant NPPF was the 2012 edition. Finally, Part 6 of the Local plan Regulations set out other procedural requirements. Where a statement of Community Involvement is in place the process must comply with its requirements in addition to those of the Regulations. This report sets out how these requirements have been met.
- 7.4 Section 20 of The Planning and Compulsory Purchase Act 2004 requires that the Plan be submitted to independent examination. The report indicates that an Examination has taken place and that the Inspector has made recommendations.
- 7.5 To come into force the local plan has to be adopted by resolution of full council on the recommendation of the Executive. The full Council has the following options:
- Adopt the plan with any main recommendations recommended by the Inspector and any non-material modifications as required by the Council
 - Defer adoption of the plan while asking the secretary of state to intervene under section 21 and to overrule the inspector
 - Bring Judicial Review proceedings against the Inspector
 - Withdraw the plan
- This report is recommending the first option.
- 7.6 Under Section 40 of the Natural Environment and Rural Communities Act 2006 (Duty to conserve biodiversity), the local authority “must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity”.
- 7.7 Under Section 17 of the Crime and Disorder Act (1998) (Duty to consider crime and disorder implications), the local authority has a “dutyto exercise its various functions with due regard to the likely effect of the

exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment)..."

7.8 Section 144 of the Greater London Authority Act 1999, requires local planning authorities (to have regard to the London Mayor's Transport Strategy) in the exercise of all its functions.

7.9 This report shows how these various considerations have been taken into account.

Linked Reports, Appendices and Background Documents

Linked Report

- N/A

Appendices

- Appendix 1 – Inspector's Report
- Appendix 2 – Schedule of Main and Additional Modifications
- Appendix 3 – Supplementary/Interim Planning Document Review
- Appendix 4 – Submission version of the Local Plan

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

- N/A

Officer contact details for documents:

- N/A



Report to the London Borough of Tower Hamlets

by Christa Masters MA (Hons) MRTPI

an Inspector appointed by the Secretary of State

Date: 20 September 2019

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Tower Hamlets Local Plan

The Plan was submitted for examination on 28 February 2018

The examination hearings were held between 6 September – 14 October 2018

File Ref: PINS/E5900/429/14

Abbreviations used in this report

AMR	Annual Monitoring Report
ALP	Adopted London Plan (2016)
BREEAM	Building Research Establishment Environmental Assessment Method
CAZ	Central Activities Zone
CD	Core Document
DLR	Docklands Light Railway
ELR	Employment Land Review
Framework	National Planning Policy Framework
GLA	Greater London Authority
HMO	Housing in Multiple Occupation
HRA	Habitats Regulations Assessment
IDP	Infrastructure Delivery Plan
IIA	Integrated Impact Assessment
LBTH	London Borough of Tower Hamlets
LEL	Local Employment Locations
LIL	Local Industrial Locations
MOL	Metropolitan Open Land
MM	Main Modification
OAN	Objectively Assessed Need
SCI	Statement of Community Involvement
SOCG	Statement of Common Ground
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SIL	Strategic Industrial Locations
The Plan	London Borough of Tower Hamlets Local Plan
TFL	Transport for London
THAA	Tower Hamlets Activity Areas
WMS	Written Ministerial Statement

Non-Technical Summary

This report concludes that the London Borough of Tower Hamlets Local Plan (the Plan) provides an appropriate basis for the planning of the Borough, provided that a number of main modifications (MMs) are made to it. The Council has specifically requested me to recommend any MMs necessary to enable the Plan to be adopted.

All the MMs were proposed by the Council and were subject to public consultation over a six week period. In some cases, I have amended their detailed wording and/or added consequential modifications where necessary. I have recommended their inclusion in the Plan after considering all the representations made in response to the consultation on them.

The Main Modifications can be summarised as follows:

- To amend various development management policy criteria and supporting text throughout the plan to ensure that the policies are clear, up-to-date, internally consistent, justified and effective;
- Modifications to various site allocations to ensure that the policy requirements are justified and effective;
- Additional policy wording in relation to developer contributions to ensure flexibility is applied regarding site specific requirements;
- Modifications to ensure that the policies relating to Metropolitan Open Land (MOL) accord with the National Planning Policy Framework (the Framework);
- To ensure the Plan reflects a robust and justified approach to open space, green infrastructure, waste water and water spaces;
- To clarify the policy approach to a zero-carbon Borough so it is consistent with the Written Ministerial Statement on this issue;
- To amend the threshold for requiring affordable housing and to clarify policy requirements in relation to residential schemes with an existing planning permission;
- Additional policy wording in relation to affordable housing, housing mix, meeting housing needs and houses in multiple occupation in order to ensure the policy wording is effective in its application;
- Amending the threshold level for wheelchair accessible student housing to ensure the policy accords with building regulations;
- Additional policy wording in relation to design requirements to ensure the policy wording is effective in its application;
- To clarify the approach in relation to Tall Buildings and ensure the policy is justified, clear and effective in its implementation;
- To ensure that the policies in relation to the Borough's protected shopping frontages are justified and effective;
- To clarify the approach towards employment land;
- To ensure adequate monitoring of the Plan is proposed in order to ensure its effectiveness.

Introduction

1. This report contains my assessment of the Local Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers firstly whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements.
2. The National Planning Policy Framework 2012 (the Framework) (paragraph 182) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy. The revised National Planning Policy Framework was published in July 2018 and subsequently updated in February 2019. It includes a transitional arrangement in paragraph 214 whereby, for the purpose of examining this Plan, the policies in the 2012 Framework will apply. Unless stated otherwise, references in this report are to the 2012 Framework and the versions of the PPG which were extant prior to the publication of the 2018 Framework.
3. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The London Borough of Tower Hamlets Local Plan submitted in February 2018 is the basis for my examination. It is the same document that was published for consultation in October 2017.
4. The Council issued a tracked changes version of the Plan, (CD LBTH/LP/005) with a number of amendments made in response to consultees and also my Matters and Issues note. Whilst I acknowledge that this version of the Plan is different from the submitted version, it is nevertheless useful in understanding the Council's responses. This document, along with the evidence base, has been made available through the Council's website and I have not been made aware of any issues of concern regarding this document.

Main Modifications

5. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications (MMs) necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM1, MM2, MM3** etc, and are set out in full in the Appendix attached to this report.
6. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out a sustainability appraisal of them (SA). The MM schedule was subject to public consultation for a six-week period between 25 March and 9 May 2019. I have taken account of the consultation responses in coming to my conclusions in this report and in light of this I have made some amendments to the detailed wording of the main modifications. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken. Where necessary, I have highlighted these amendments within my report.

Policies Map

7. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the plan identified as the Policies Map and set out in Core Document (CD SD2).
8. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the published MMs to the Plan's policies (**MM13, MM28, MM29, MM30 and MM33**) require further corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are effective. These further changes to the policies map (CD LBTH/LP/008) were published for consultation alongside the MMs (CD LBTH/LP/004b).
9. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in the submission policies map (CD SD2) and the further changes published alongside the MMs (CD LBTH/LP/008) incorporating any necessary amendments identified in this report.

Assessment of Duty to Co-operate

10. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
11. The Duty to Cooperate Statement (CD SD11) February 2018 as well as the evidence contained within the hearing statements sets out the Council's position in this regard and explains how it has sought to discharge its duty. The evidence explains in detail how the Council has engaged appropriately in relation to the strategic matters affecting the Plan through various methods including stakeholder events, workshops and forum meetings. Detailed statements of common ground (SOCG) have also been prepared in conjunction with a number of key stakeholders including Thames Water, The Port of London Authority, Transport for London (TFL) and the neighbouring London Borough of Hackney as well as agreeing a memorandum of understanding with the London Legacy Development Corporation. In addition, the Council have ensured continuous engagement with the Greater London Authority (GLA) as the strategic planning authority throughout the Local Plan process.
12. In terms of economic growth, housing delivery and infrastructure provision, the Council has worked with a number of the neighbouring authorities through an extensive number of stakeholder meetings and forums. This approach has, where appropriate demonstrated the Council's commitment to addressing

cross boundary issues and the strategic priorities facing the Borough. For example, in relation to economic growth, the Council has worked with the City of London, the London Borough of Hackney and Association of London Borough Planning Officers to secure the future supply of employment land across the Borough, identify preferred office locations and measures to protect the character and function of the Central Activities Zone (City Fringe and Canary Wharf). These actions clearly demonstrate the Council's understanding of the importance of cross border issues.

13. Overall, I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

Assessment of Soundness

Main Issues

14. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, I have identified a number of main issues upon which the soundness of the Plan depends. Under these headings my report deals with the main matters of soundness rather than responding to every point raised by representors. In addition, policies and designations which do not raise main issues and are considered to be sound have not been referred to within the report.

Issue 1 – Have the relevant legal requirements been met? Does the Plan contain a robust spatial vision and justified strategic objectives consistent with national policy and in general conformity with the Adopted London Plan (ALP)?

15. The London Borough of Tower Hamlets Legal Compliance Checklist (CD SD04) sets out how the legal requirements identified by the regulations have been addressed.
16. Chapter 1 of the Plan identifies a clear strategic vision for the Borough up until 2031. In particular, the vision notes that by 2031, Tower Hamlets will embrace its role as a key focus for London's growth. As well as continuing to build high quality residential neighbourhoods, the Borough will continue to strengthen its economic focus, which will be sustained through enhancement of the public transport network. This strategic vision is supported by a number of documents within the evidence base including the Tower Hamlets Community Plan (CD SED4), Tower Hamlets Strategic Housing Market Assessment (CD SED17), the Infrastructure Delivery Plan (CD SD06) and the Tower Hamlets Strategic Transport Assessment (CD SED61). The vision identified is also consistent with the ALP (CD SD07).
17. Two key objectives are identified to meet this vision. These are to manage the growth and shape change and secondly, sharing the benefits of growth. A significant number of aims are identified as to how each of the key objectives will be met. Whilst it is not necessary to repeat these here, it is important to note that they focus on a number of key areas including delivering London's housing and employment growth, supporting additional transport investment, strengthening the roles of town centres, delivering successful placemaking and

ensuring housing developments contribute towards creating socially balanced and inclusive communities.

18. Two policies provide the spatial framework as to how the vision will be achieved. Policy S.SG1 identifies areas for growth and opportunity within Tower Hamlets. It is a 7-part policy which identifies the broad locations and opportunity areas where growth and investment will be focused over the plan period. In addition, policy S.SG2 explains how the Plan aims to deliver sustainable growth in accordance with the areas identified above. Both of these policies are reflective of the vision setting a Framework for where housing development will be focused, how town centres will evolve and develop, and identify in strategic policy terms where employment development and new infrastructure to support the planned growth will be focused. Both of these policies identify the broad approach to the delivery of sustainable growth and development within Tower Hamlets. The overall approach is sound, it is consistent with the strategic objectives and spatial vision identified within the Plan. It is also an approach which is consistent with both national policy and the ALP.
19. A number of the SOCG demonstrate how the Council have sought to work in a collaborative manner in relation to a number of strategic planning matters identified. The SOCG have been prepared with a number of bodies including developers, statutory consultees as well as neighbouring Boroughs demonstrating a commitment to work collaboratively.

Conclusion on issue 1

20. Taking the above into account, I conclude the Plan complies with all the necessary relevant legal requirements in the 2004 Act. The spatial vision is robust, and the overall strategic objectives are appropriately justified, are in general conformity with the ALP and are consistent with national policy.

Issue 2 – Is the spatial strategy of the Plan supported by the Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA)?

21. The Integrated Impact Assessment (IIA) (CD SD6) dated September 2017 incorporates the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) as well as the Habitats Regulations Assessment (HRA). It also encompasses a Health Impact Assessment and Equalities Impact Assessment. This document was updated in March 2019 (LBTH/LP/011a) to reflect the MMs proposed.
22. The ALP identifies three opportunity areas within the Borough where it anticipates that significant growth will be focused. These are City Fringe/Tech City, Isle of Dogs and South Poplar, and Lower Lea Valley. The ALP sets the framework for the SA and the spatial strategy adopted by the Borough. As a result, the scope for the consideration of alternatives is somewhat narrowed. However, as part of policy S.SG1, the Council have also identified the Central Sub Area in addition to the opportunity areas identified above as a focus for growth. All these areas have the potential to absorb significant growth and support urban renewal. The policy framework also recognises the unique characteristics and local distinctiveness of each of the areas concerned. These are the locations where the site allocations set out in Part 4 of the Plan propose to deliver the majority of the planned growth over the plan period.

23. The SA has used a framework to appraise each of the policies identified against set defined objectives. In common with other SAs, defined criteria are used to assess each of the proposed site allocations against SA objectives. For each of the sustainability objectives identified, there are targets set and a clearly defined basis for appraising the site allocations. In my view, the level of detail contained within the SA is proportionate and the reasons for selecting the site allocations are sufficiently detailed. Overall, it provides an appropriate approach and the assumptions and criteria used have also been adequately justified. As a result, I am satisfied that the general approach to the SA is a robust one and that the necessary procedural and legal requirements have been met accordingly.
24. In terms of the HRA, the initial assessment focused on five European sites within 15km of the London Borough of Tower Hamlets (LBTH). These are Epping Forest SAC, Richmond Park SAC, Wimbledon Common SAC, Lee Valley SPA and Lee Valley Ramsar. The HRA concluded that the plan will have no significant effects (either alone or in combination) on any European Sites. This is a reasonable conclusion to reach and Natural England have not raised any concerns.

Conclusion on issue 2

25. For the reasons outlined above, the spatial strategy for the Plan is supported by both the SA and HRA. Reasonable alternatives have been considered by the Plan and the Plan complies with all the necessary relevant procedural and legal requirements in this regard.

Issue 3 – Is the Plan’s approach to housing delivery justified and consistent with national policy and in general conformity with the ALP?

Housing Delivery

26. The approach to housing delivery is set out within the Five Year Housing Land Supply and Housing Trajectory Statement (CD SED27). This document is informed by a number of assumptions concerning future build out rates and lead times for housing delivery. Where relevant, bespoke phasing plans from specific developers of the individual sites concerned have also informed the trajectory. This evidence, taken with both surveys from existing developers as well as internal data on delivery rates has been used to inform the development trajectory. It presents a proportionate and satisfactory approach.
27. As an inner London Borough, Tower Hamlets has played an important role in housing delivery in recent years, delivering more homes than any other authority in England. The policies to deliver the supply of housing within the Borough over the plan period are set out within chapter 4 of the Plan. The text acknowledges the role that the existing ALP has in terms of the evidence base and setting the vision and quantum of housing development. For LBTH, this means a housing target of 39,314 homes over the period 2015-2025. The target equates to a minimum requirement of 3,931 homes per annum, and the ALP explains that it expects this target to be ‘rolled forward’ for the Plan period. As matters stand, the Plan would satisfy this annual requirement, however there is an acknowledged shortfall towards the end of the Plan period. The Framework acknowledges that the requirement is to identify a

supply of specific developable sites for the 6-10 year period and where possible for years 11-15.

28. The Housing Delivery Strategy (CD SED26) provides full details of how the LPA intend to reduce the current anticipated shortfall through a number of identified measures. These include the delivery of housing at greater density levels, Council delivery of Council enabled affordable homes (not included within the housing trajectory) and securing funding from the GLA to accelerate housing delivery through the GLA Housing Zones. It is also worth noting that the new London Plan proposes updated housing targets for each of the individual London Boroughs. Early iterations of the Plan indicate that the revised target for LBTH will be significantly reduced which could almost remove the anticipated shortfall. However, given the Inspector's report of the new London Plan is yet to be produced, this is not a position to which any tangible planning weight can be attached.
29. Paragraph 4.10 of the Plan sets out what actions the Council will take if the housing targets are not being met. However, **MM7** is necessary to ensure that specific steps are taken in relation to monitoring, with appropriate triggers and timescales as outlined within section 5 of the Plan. Overall, I am satisfied that the approach adopted is sound and in accordance with the requirements of the Framework I have summarised above. The shortfall identified towards the end of the plan period does not cause me concern in terms of housing delivery.
30. As I have also set out below, the capacity of a number of the more longer-term strategic development sites within the Plan is yet to be determined and these could potentially have a significant role to play in terms of the longer-term housing delivery picture. The evidence base (including CD SED17 Strategic Housing Market Assessment (SHMA) 2017) reflects a lower objectively assessed need (OAN) of 46,458 homes for a 15-year period (2016 – 2031) and is based on the most up-to-date population projections. It also demonstrates the fact that the Borough is expected to make a significant contribution to London's overall strategic need. Further Alterations to the London Plan which were published in March 2015 identified the minimum housing target for LBTH for a ten-year period of 39,314 dwellings.
31. Chapter 4 of the Plan presents the Council's policy approach to housing and meeting housing need. The approach is identified through policies S.H1 – D.H7 inclusive. The Council has at table 1 identified the expected number of additional homes to be delivered across each of the sub areas. The sub areas identified are consistent with the areas for growth identified by policy S.SG1.
32. Returning to the evidence base, the SHMA has been prepared with due regard to the Framework, the Planning Practice Guidance (PPG), the strategic vision as well as the ALP and the Further Alteration's to the London Plan (2015), as well as the Greater London Authority Housing SPG 2016 (CD SED21) . This evidence base and the conclusions reached confirm that the evidence is justified and provides an effective evidence base for the Plan policy framework.
33. The Five-Year Housing Land Supply and Housing Trajectory Statement (CD SED27) sets out the approach adopted by LBTH in the context of National

policy and the ALP. In the context of paragraph 47 of the Framework and the buffer requirement, the Council has over the last 5 years exceeded the housing target by some 417 homes. Whilst I acknowledge there has been a shortfall in the delivery of the target in two of the years, this cannot be regarded as a record of persistent under delivery. As a result, the application of a 5% buffer is a robust and sound approach to this issue.

34. In summary, the approach to housing delivery within the Plan is based on a robust and up-to-date evidence base which is consistent with both national policy and the ALP. The overall level of housing delivery will ensure that a rolling 5 year supply of land for housing will be achieved, at least for the next ten years of the plan period.

Affordable Housing

35. The Strategic Housing Market Assessment (SHMA) update, May 2017 (CD SED17) assesses affordable housing needs for the Borough, establishing current unmet need for affordable housing and projecting future affordable housing need. The methodology and approach adopted accords with the guidance contained within the PPG. The evidence base concludes that there is a need to provide additional affordable housing for 20,922 households over the 15 year period between 2016-2031, representing 55% of the demographic growth for Tower Hamlets. Providing affordable housing at this level would provide for current unmet needs in addition to projected future growth of affordable housing need.
36. As a result, it is clear that Tower Hamlets, in common with other central London Boroughs, has a very clear and pressing need for affordable housing to be provided over the plan period. The policy approach as set out within the Plan to achieve this includes Part 2 of policy S.H1, the thrust of which is to seek to set an overall target for 50% of all new homes to be affordable. This overall target has been informed by the evidence base and in particular the SHMA (2014, CD SED16 and 2017, CD SED17). The policy goes on to explain how the 50% target will be achieved.
37. **MMS** amends the affordable housing threshold levels to bring them in line with the 2019 Framework. Although this Plan is being examined under the transitional arrangements and against the 2012 Framework, I consider such an adjustment provides greater clarity in this instance and is justified accordingly. The MM also introduces corresponding changes to the supporting text to reflect the most up-to-date threshold levels. It also deletes the requirement for lower levels of affordable housing to be accepted in 'exceptional circumstances'. In my view, this is an unnecessary test in the context of this policy, where the policy wording already requires any lower levels of affordable housing provision to be robustly justified through viability evidence or where it can be demonstrated that there are clear barriers to delivery. In short, the proposed 'exceptional circumstances' test has no basis in national policy, would be overly and inappropriately restrictive and would run the risk of undermining the delivery of new housing. **MMS** is therefore necessary for the policy to be effective and thus sound.
38. The detailed policy approach to affordable housing can be found at policy D.H2 which is a 6 part policy. The policy sets out the detail of the tenure split

envisaged by the affordable housing provision. Part 1 of the policy stipulates that 70% is rented and 30% intermediate in terms of tenure split. The approach to affordable housing is supported by the evidence base including the Affordable Housing and Viability SPG (CD SED22). In particular, this document sets out how policy 3.11 of the ALP seeks to maximise affordable housing provision and identifies that 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale. Leading on from this, the Affordable Housing and Viability SPG advises that the preferred tenure split is at least 30% low cost rent, 30% intermediate products and 40% to be determined by the LPA.

39. Part 3 of the policy gives high priority to the provision of family homes. This accords with policy 3.11 of the ALP which outlines this as a key objective. Part 2 of the policy identifies how development will maximise the delivery of affordable housing on site. **MM9** provides greater certainty to the policy wording and supporting text concerning how the application of affordable housing thresholds will be applied in situations where previous planning permissions have been granted and the schemes are subsequently amended or extended. The MM also introduces additional text in relation to the application of the housing mix requirements on schemes which propose to deliver at least 35% affordable housing. This modification provides greater flexibility for the Council in terms of the housing mix which can be achieved when the development exceeds 35% affordable housing, creating clearer alignment with the GLA's threshold approach to delivering affordable housing and is a justified approach. The modification will also provide greater clarity in relation to estate regeneration schemes and ensuring that they meet the latest decent home standards. This MM to both the policy wording and supporting text is necessary to ensure policy D.H2 is effective in its application and therefore sound.

General Housing Policies

40. Part 4 of policy S.H1: Meeting housing needs addresses development to support the needs of specific communities within the Borough. The specific communities identified by the policy include older people, disabled and vulnerable people, students and gypsies and travellers.
41. **MMS** deletes part 5 of the policy which required residential development to encourage increased housing sales to Londoners, preferably for owner occupation. Part 2 of the policy already places a significant emphasis on developments creating balanced and mixed communities, responding to local and strategic need. This local and strategic need includes all sectors of the population. In my view, part 5 of the policy as currently drafted would be contrary to the strategic vision of the plan which includes ensuring that Tower Hamlets continues to be home to a wide range of diverse communities, encouraging inclusive and cohesive neighbourhoods. In short, part 5 of policy S.H1 is neither necessary or effective. In its place, **MMS** introduces supporting text to the policy, recognising the policy requirements to respond to local and strategic market housing need, and acknowledging the difficulties facing residents within the Borough in terms of the impact of overseas investors on the affordability and availability of housing ownership. This is necessary for effectiveness.

42. Policy H4 addresses the protection of existing specialist housing provision. The policy notes that existing specialist and supported housing will be protected where it is suitable for its use and meets relevant standards for this form of accommodation. The supporting text for the policy provides an extensive list of examples which may constitute specialist housing. This includes but is not limited to sheltered housing, residential care homes, nursing homes and extra care homes. Part 2 of the policy sets a criteria based approach towards the redevelopment of any existing sites which include specialist and supported housing and part 3 of the policy presents a criteria based approach for the development of new specialist and supported housing. This policy is justified by the evidence base and as a result of the criteria and wording used, will be appropriately effective in its application. It is therefore sound.
43. There is a strong presence of further education establishments across the Borough, necessitating a policy in relation to student housing which is provided by policy D.H6. Part 1 of the policy recognises the need to support the delivery of student accommodation in appropriate highly accessible locations or in locations close to the Borough's Higher Education Institutions, measured against the priorities for other competing land uses. This requirement is in accordance with policy 3.8 (part Bh) of the ALP which acknowledges the challenges facing a number of London Boroughs in achieving housing for both conventional homes and student accommodation.
44. **MM10** revises the figure for wheelchair accessible student accommodation provision from 10% in the submitted Plan to 5% and provides additional text to the supporting text to justify this approach. This is necessary to ensure the Plan reflects the most accurate and up-to-date building regulations guidance on this issue. Part 2 of the policy seeks to protect the net loss of existing student accommodation, advising that it will only be supported where it can be demonstrated that the accommodation is no longer needed or adequate replacement housing will be provided.
45. It is important that an appropriate balance is struck between the policies in relation to both specialist housing (policy D. H4), student housing (policy D.H6) and housing with shared facilities (policy D.H7). To this end, the Council have provided a detailed analysis of how the policy requirements are balanced. There is a clear emphasis across the policy framework and all of these housing types to be in locations which are in areas of high transport accessibility. This is a sustainable approach which is to be supported.
46. Policy D.H7 seeks to address the acknowledged growth in purpose-built large scale houses in multiple occupation (HMOs) by providing a criteria based approach to any new proposals. **MM11** is necessary to ensure the policy is aligned with the overall objectives of policy S.H1 and also to ensure that any proposals meet an identified need going forward. For the same reasons, the modification also includes additional explanatory text.
47. Policy D.H5 addresses accommodation for gypsies and travellers and provides a criteria based approach towards any development proposals which may come forward within the Borough. The Gypsy and Travellers Accommodation Assessment (CD SED23) identifies the need for one additional pitch within the Borough over the plan period. The methodology used to inform this study has been clearly set out and provides an effective evidence base to support the

approach adopted. In terms of addressing this need and making provision for the existing gypsy and traveller community, policy S.H1(4)d seeks to safeguard the existing provision at Old Willow Close and any subsequent additional pitches to be delivered following the completion of the Elizabeth Line (Crossrail 1). However, the submitted Plan did not accurately reflect this safeguarded area in relation to the completion of the Elizabeth line works. The Council have proposed to rectify this by updating the adopted policies map in accordance with the schedule of changes to the policies map already consulted on (CD LBTH/LP/008). Overall, the approach to gypsies and travellers meets the need identified by the evidence base and is a sound approach.

48. The Council's requirements in relation to housing standards and quality are identified by policy D.H3. Space standards are set out in accordance with the London Plan space and accessibility standards, as well as minimum requirements in relation to the provision of amenity space provision on site. The policy is justified by the evidence base and appropriately worded so as to be effective in its application.

Conclusion on issue 3

49. Taking all of the evidence set out above into account, I conclude on issue 3 that the Plan's approach to housing delivery is both justified and effective, consistent with national policy and in general conformity with the London Plan. Subject to the MMs outlined above which are necessary for soundness, the Plan has been positively prepared and will be effective in meeting the housing needs of the Borough and its residents over the plan period. It will also go some way towards addressing affordable housing needs and overall, the approach is sound.

Issue 4 – Does the plan take a justified and robust approach to the delivery of the necessary infrastructure required to support the level of housing growth proposed? Will there be sufficient school places to support this growth? Overall, is the plan consistent with the ALP and national policy?

50. In accordance with the Framework, the ALP acknowledges at policy 3.16 that adequate provision for social infrastructure is an important area of new development and regeneration. My report deals firstly with the general infrastructure needs of the Borough arising as a result of the level of growth proposed over the plan period and separately the approach to school place planning and provision during the plan period.

General Infrastructure Provision

51. The Infrastructure Delivery Plan (IDP) (CD SD06) sets out details concerning engagement with infrastructure providers, key stakeholders and landowners to understand the estimated phasing and costs of the necessary infrastructure required to support the level of growth proposed over the plan period. In relation to certain infrastructure aspects such as open space, it also records existing infrastructure deficits. The document goes on to explain how the infrastructure necessary will be funded and provided. The Council has produced a detailed infrastructure phasing plan linked to the housing trajectory. From this document, a clearer picture is available of how the

infrastructure requirements and the planned growth will be aligned over the plan period.

52. The Local Plan Viability Assessment (CD SED5) 2018 and the IDP represent the Plan's evidence base in terms of testing the delivery of the necessary infrastructure required to support the planned level of growth as set out in the Plan up until 2031. These infrastructure requirements are set out in detail within the IDP which has been informed by the housing trajectory. A number of background studies have informed the infrastructure requirements, including but not limited to the Strategic Transport Assessment (CD SED61), Indoor Sports Facilities Strategy (CD SED38), Open Space Strategy (CD SED39) as well as the Green Grid Strategy (CD SED42).
53. This work includes the site specific testing of the individual site allocations taking into account the infrastructure requirements identified, as well as using growth projections to understand future infrastructure requirements and addressing these through the site allocations identified. This evidence base, supplemented by the infrastructure delivery and indicative housing trajectory work prepared by the Council demonstrates to me that the individual site by site infrastructure requirements have been considered in detail, including the phasing, timing of development and funding requirements. In particular, chapter 2 sets out in some detail the current and future projected developer contributions as well as the total costs of individual projects by infrastructure type. Overall, the evidence in this regard is sufficiently detailed and proportionate.
54. The Site Allocations Methodology (CD SED64) identifies each of the infrastructure requirements likely to be necessary as a result of the growth planned over the Plan period. A phasing programme has been identified which sets out what infrastructure requirements will be and when they will be delivered in order to support the Council's housing delivery target.
55. In the context of this background, the policy framework to deliver this infrastructure is set out at Chapter 2 of the Plan. Policy S.SG1 relates to the defined areas of growth and opportunity within Tower Hamlets and part 7 of the policy advises that development will be required to support the delivery of significant new infrastructure to support growth within the four sub areas. Specific infrastructure provision referred to by the policy includes improvements to the transport network, green grid projects and social infrastructure such as schools, open space, health centres and leisure facilities.
56. In addition to this, policy S.SG2 refers to the delivery of sustainable growth in Tower Hamlets. The second part of the policy refers to the delivery of social and transport infrastructure as well as public realm improvements which are inclusive and accessible to all. The mechanism through which developers will be expected to contribute towards infrastructure provision is outlined at policy D.SG5. In broad terms, the policy outlines the fact that developments will be expected to contribute towards improvements necessary for associated infrastructure to support the planned growth outlined within the Local Plan. The policy is consistent with both the ALP and the Framework. The policy also acknowledges the role that the existing Borough wide Community Infrastructure Levy charging schedule has in terms of delivering the necessary

infrastructure and outlines those impacts which would not be covered by the charging schedule (i.e affordable housing).

57. Health Impact Assessments are required to be submitted in accordance with policy D.SG3, this includes developments which are likely to impact on health outcomes or in locations which may impact on health outcomes. **MM1** amends the locational criteria to refer to major development within an area of sub standard air quality, and includes a reference to this designation on the policies map. This modification is necessary to ensure the policy is effective.
58. Policy D.SG5 sets the framework for developer contributions and sets out how contributions from developers to fund improvements to infrastructure and the environment will be obtained. The policy is appropriately justified by the evidence base and is clear in terms of other mechanisms to be used in order to secure infrastructure requirements across the Borough. **MM2** introduces specific wording to the policy to ensure that developer contributions are applied flexibly in relation to the site allocations contained within the Plan. This is necessary to ensure that the policy is effective in its application and additional explanatory text is also included as **MM3** to ensure the policy is appropriately justified.
59. The IDP will be reviewed annually and updated accordingly and **MM31** includes a new monitoring indicator to this effect. This is necessary to ensure that the approach is justified and effective. The Council has demonstrated that it has been able to update the IDP in an in-depth manner and has included with this dialogue with key infrastructure partners. To conclude, I am content that the IDP and supporting evidence base presents a robust assessment of the infrastructure necessary to be provided and the policies outlined will support the growth planned for the Borough over the Plan period and deliver the strategic objectives and vision of the Plan accordingly.
60. I am mindful that the latter part of policy D.SG5 states that vacant building credit (VBC) will not apply across the Borough. Although I recognise the weight to be afforded to national policy in relation to this matter, the local evidence base within the Borough provides sufficient justification for the approach adopted. It acknowledges the historical delivery of brownfield sites within the Borough which is considerable. The Local Plan Viability Assessment (CD SED5) also considers the effect of the VBC on the delivery of affordable housing, concluding that the introduction of a VBC would have a significant impact on the Council's housing supply. Taking all of these factors into account, I am of the view that the approach adopted to this issue is a sound one.

School Place Provision

61. The IDP (CD SD06) identifies the existing capacity and future needs of community facilities within the Borough. The provision of school places is fundamental to housing delivery given the significant population growth anticipated across the Borough over the plan period.
62. In addition to the IDP, the approach to school place provision is summarised in a number of background evidence documents including the Spatial Assessment Need for Schools (CD SED72) 2018, as well as the Matters and Issues 3 LBTH

response (CD LBTH/HS/003) and the LBTH post hearing clarification note (CD LBTH/LP/007a).

63. In essence, the approach adopted by the Council is one of over provision. In crude terms, the projected housing growth would require the provision of 6 new primary schools and 4 new secondary schools across the Borough. The Council's response is to plan for 9 primary schools and 5 secondary schools respectively. By including the requirement for new school provision within a number of the site allocations, the Council contend that the delivery of school provision can respond to the identified need when the site is delivered. Indicative delivery timescales have been identified by the Council. The Council have also helpfully identified (CD LBTH/AD/008) the locations of existing primary school provision across the Borough, the individual catchment areas and the site allocations which envisage the delivery of a primary school as part of the infrastructure requirements. This demonstrates that the new primary school provision will focus on the south east area of the Borough Area 3 (Poplar) and Area 4 (Isle of Dogs). Given the fact that the Isle of Dogs will see the largest concentration of housing growth over the plan period, this is a justified and effective approach.
64. The Council have also provided a detailed response to illustrate how air quality issues will affect the provision of schools across the site allocations. Figure 15 within the Plan illustrates the location of the areas of substandard air quality within the Borough and policy D.ES2 requires an air quality assessment to be submitted with any subsequent planning application for education use. I am satisfied that this issue has been suitably assessed for the purposes of the Local Plan and the issue of school place planning and the Council have taken a proportionate approach to this issue.
65. The Council have referred me to a number of factors justifying the approach adopted. These include the difficulty in projecting when development will come forward given the statutory requirement to deliver enough school places, the scarcity of land and complex land ownership issues within the Borough and the uncertainties of population projections and subsequent impact on school roll projections given the uncertainties of Brexit. I fully acknowledge that these factors can have a significant influence over the planning for school places and do not make the task of school place planning straightforward. Nevertheless, these are indeed factors facing a number of inner-city boroughs and I do not consider these factors alone to be particularly unique to the Borough of Tower Hamlets.
66. Nevertheless, the Council have explained that the approach adopted provides the Borough with the most responsive and resilient approach to school place provision across the Borough. Evidence has also been provided concerning the increasing proportion of children with complex needs who may require specialist or alternative education provision in this regard. There is also potential that existing schools may be expanded and therefore the position may change further. The Framework attaches great importance to ensuring that there is a sufficient choice of school places available. It also seeks to ensure that the capacity of education infrastructure is assessed and that any required infrastructure should be planned for. On balance, the Plan would meet these objectives and taken with the factors outlined above and set out

within the evidence base presented, I find the overall approach to school place planning adopted by the Council to be sound.

67. The approach adopted could have implications in terms of the deliverability and viability of a number of the site allocations. In order to address this, **MM3** seeks to ensure that when planning applications are determined, flexibility will be applied to the site allocation requirements based on the provision of infrastructure and other site specific requirements identified within the plan. The inherent flexibility to policy D.SG5 introduced by this modification is essential for soundness and acknowledges the approach adopted to school place planning and the flexibility which needs to be applied here.
68. In order for the approach to be effective, it is necessary for the plan to appropriately monitor the delivery of primary and secondary schools across the Borough and therefore ensure that planned delivery rates are kept proportionate to school place needs. **MM31** will achieve this objective by introducing a new monitoring target and indicator to this effect. This will allow for the monitoring of school delivery through the Plan which is essential for the approach adopted by the Council to be sound. This on-going monitoring will provide an opportunity to re-appraise and revisit the identified school place requirements and provision on a continuous basis.
69. Taking into account the modification put forward, the approach adopted is sound and justified. As a result, and taking all of the above factors into account, I conclude that the approach to school place planning and provision is justified and effective and will result in the provision necessary to support school age children in the Borough and the level of growth envisaged over the plan period.

Conclusion on Issue 4

70. To conclude, subject to the MM outlined above, the Plan takes a justified and robust approach to delivering the infrastructure necessary to support the planned growth. The approach adopted is supported by the evidence base and conforms with both the ALP and national policy. The approach to school places to support the planned growth is sound.

Issue 5 – Does the Plan provide the most appropriate strategy towards the economic growth of the Borough and designated town centres of the Borough?

Economic growth

71. As with the approach to housing, the ALP provides figures for projected employment growth across the Borough to 2031. Chapter 5 of the Plan identifies the relevant policies which will be applied to employment related development within the Borough. In essence, the policies aim to protect existing provision (policy D.EMP3) and provide a positive policy framework to support the strong local economy by encouraging new employment provision within appropriate locations (policy D.EMP2) as well as providing appropriate protection of the role and function of the Borough's designated employment locations (as defined by policy S.EMP1).

72. The evidence base which underpins this policy includes but is not limited to CD SED28 Employment Land Review (ELR), CD SED29 Preferred Office Location Boundary Review and CD SED30 Growth Sectors and SME Workspace Study. The ELR provides a comprehensive and objective assessment of the future requirements for employment provision across the Borough during the plan period. The evidence base as a whole is both robust and conforms with the wider approach to economic growth set out within the ALP.
73. Table 2 sets out the jobs and floorspace forecasts across the Borough during the plan period. Although there is a sufficient supply of sites identified for office development, there is an acknowledged shortfall of industrial floorspace compared to demand. This is attributed to the historical loss of industrial land within the Borough, a position explained in further detail by the ELR. The policy framework outlined below aims to address this issue by providing a level of protection towards existing provision as well as an appropriate policy framework for assessing new proposals which may come forward in appropriate locations.
74. Drawing on the policy recommendations set out within CD SED28, policy S.EMP1 sets the overarching policy framework for creating investment and jobs across the Borough. The policy seeks to maximise the provision of employment floorspace to meet the Borough's target of creating 125,000 new jobs (across all sectors) to the period to 2031. The policy provides a clear structure for the consideration of development proposals by clearly identifying the principal characteristics and role and function of each of the designated employment locations. These employment locations are illustrated at both figure 11 within the Plan as well as on the policies map.
75. The policy states that the Borough's Primary Preferred Office Location (POL) is recognised as the commercial core area to the north of the Isle of Dogs and including Canary Wharf. This area is, under the policy framework, identified as unsuitable for residential land uses or other land uses which could undermine the strategic function of this area. Given the global significance and acknowledged importance of this area to the employment role and function of the Borough and the wider London economy, this is a justified and effective approach.
76. The Secondary POL includes parts of the City Fringe and north of the Isle of Dogs and includes existing as well as potential employment locations. Whilst employment land remains as the dominant land use, the policy states that residential land uses will be acceptable subject to the application of a percentage threshold of 25% of the site area. The Preferred Office Location Boundary Review tests the application of this percentage threshold figure. The setting of a defined percentage is to a large degree a matter of planning judgement. Whilst I accept that concerns have been expressed regarding the application of a quantified percentage to preferred land uses, this policy wording stipulates that significant weight is given to office and other strategic Central Activities Zone (CAZ) uses as a first priority. On this basis, I am not persuaded that any change to the policy is necessary to achieve soundness. The application of a percentage threshold will ensure that the policy is effective and this is a justified approach which will ensure that the predominant employment function of these areas remain.

77. The remaining part of the CAZ is noted as zone C and encompasses areas of the CAZ outside of the Primary and Secondary POL. The strategic function of these areas is acknowledged by the policy, which will support larger purpose-built office buildings as well as the provision of employment and residential led schemes associated with the CAZ functions of the area. The remaining employment areas are classified as Local Employment Locations (LEL), Strategic Industrial Locations (SIL) and Local Industrial Locations (LIL). The policy notes that these areas provide opportunities for local and specialist employment needs, warehousing and waste management and light manufacturing/industry respectively. The policy also notes that the Tower Hamlets Activity Areas (THAA) and designated town centres provide opportunities for purpose-built office development with retail and leisure uses on the ground floor.
78. Overall, the policy approach to the individual employment locations identified is consistent and appropriately justified by the evidence base, in general conformity with the classifications provided within the ALP and will be effective in its implementation.
79. Policy D. EMP2 sets out the policy approach towards new employment space. It includes a number of criteria including a requirement that at least 10% of new floorspace should be provided as affordable workspace within major commercial and mixed-use schemes. The evidence to support this approach is provided within the Tower Hamlet's Growth Sectors and SME Workspace Study (CD SED30) as well as the Tower Hamlets Affordable Workspace Policy Review (CD SED31). This level of provision has also been tested as part of the viability evidence to support the plan. Given the very pressing need for affordable workspace provision identified by the evidence base, the policy is justified and sound.
80. Policy D.EMP4 provides specific guidance in relation to redevelopment proposals which may come forward within designated employment areas. Aligned with policy S.EMP1, it provides a stepped approach to the protection of the various designated employment areas. Flexibility is embedded in the wording of the policy, acknowledging that the site-specific circumstances of each individual proposal will be of primary importance. In light of the evidence contained within the ELR on this issue as well as the conclusions I have already drawn above regarding policy S.EMP1, this is a justified approach. The policy wording is clear, which will ensure that it is effective in its implementation. Overall, the policy presents a clear and justified approach which will be effective in its application.

Meeting retail needs over the plan period

81. In terms of new retail floorspace requirements over the plan period, table 4 provides a breakdown of the retail capacity requirements for both convenience and comparison goods across the different designated centres over the plan period. These figures are supported by the Town Centre Retail Capacity Study (CD SED33), informed by a number of assumptions and forecasts which are set out in detail within the evidence base. This includes an assessment of existing shopping patterns and market share across the Borough. The approach adopted accords with the Framework by providing a basis for

assessing the capacity of the existing centres to accommodate new town centre development.

Policies for the designated centres and frontages

82. The Framework is clear that retail policies should support the vitality and viability of recognised centres, define a network of centres as well as setting clear policies which identify what uses will be permitted within designated frontages. Recognising these objectives, policy S.TC1 defines the network of centres within the Borough. The classification of these centres is illustrated on both the policies map and figure 12 of the Plan. The boundaries are supported by the retail evidence base which includes the Town Centre Retail Capacity Study (CD SED33), Town Centre Strategy (CD SED34) and Town Centre Topic Paper (CD SED35). The definitions used within the policy accord with the Framework and the ALP, which defines at policy 2.15 and annex 2 the network of London's town centres and definitions. The policy plainly defines where each of the centres within the Borough fall within the hierarchy as well as clearly identifying the functions and roles associated with each of the centres.
83. Policy D.TC2 identifies both primary and secondary shopping frontages which have been appropriately justified by the evidence base including an assessment of retail need and town centre health checks (CD SED 33). However, in relation to some shopping areas, the submitted Plan did not reflect the evidence in terms of the shopping frontage recommendations as it failed to designate primary shopping areas within the major and district centres. The Council have proposed to rectify this by updating the adopted policies map in accordance with the schedule of changes to the policies map already consulted on (CD LBTH/LP/008).
84. The policy provides a threshold level approach to A1 (retail uses) within these defined frontages. The threshold levels have been set in order to maintain a dominance of A1 floorspace within the primary frontages, to support the vitality and viability of these centres. This approach is supported by the evidence base including Experian goad data and the annual monitoring report data. In light of this evidence, the approach to the protection of retail frontages within the designated centres is clear and justified. **MM12** seeks to amend the policy wording in relation to the threshold level application in secondary shopping frontages, acknowledging the wider mix of uses which are important to the role and function of secondary frontages and the centres generally. This MM is necessary to ensure the policy is effective in its application.
85. Retail development outside of the designated centres is addressed by policy D.TC3. The general thrust of the policy is to direct new retail development towards existing designated centres. Part two of the policy sets a criteria based approach towards development proposals which would result in the loss of A1 retail shops outside of the designated centres. This approach is consistent with both the Framework and the ALP. **MM12** amends the wording of the policy to specifically refer to Major, District and Neighbourhood Centres, as well as introducing additional supporting text to clarify that the extent of the primary shopping areas are shown on the policies map and to also provide greater clarity to the role of the CAZ and THAA. This modification is necessary to provide greater clarity to the policy by acknowledging the important role

that these areas play in the town centre hierarchy, and for consistency across the Plan as a whole.

Other retail policies

86. Policy D.TC5 defines appropriate locations for food, drink and entertainment uses as well as night time economy uses across the Borough. Part 3 of the policy provides a criteria based approach to the development of new hot food take away premises. This part of the policy introduces a relatively restrictive approach to the potential establishment of new hot food takeaways, and the criteria to be met sets a high threshold level. It includes a 200m walking distance buffer to new hot food takeaways around schools/local authority owned leisure centres. The approach is supported by the evidence base including the Town Centre Topic Paper (CD SED35).
87. The Council have produced evidence to illustrate the extent of such a restriction across the Borough. The evidence base demonstrates that the levels of obesity within Tower Hamlets are amongst the highest across all London Boroughs. The existing proportion of hot food takeaways in some of the centres is well above the national average. The approach will assist in protecting the vitality and character of the designated frontages, whilst balancing the needs of the Borough's residents. As a result, the approach is warranted by the Council and the policy wording ensures it is capable of being effective in its implementation.
88. The Annual Monitoring Report (AMR) will review the proportion of A1 uses within designated frontages, vacancy rates and levels of town centre uses within designated centres. **MM31** introduces a new monitoring target for no more than 5% of all town centre uses to be A5 uses as well as no new A5 uses to be permitted within 200m walking distance of an existing or proposed school. I have amended the wording of this modification to include reference to local authority owned leisure centres so the monitoring is consistent with the policy wording. The monitoring will be supplemented by an annual public health analysis of childhood obesity in Tower Hamlets. This information will be used to assist the monitoring of the town centre boundaries as drawn and ensure that the policies outlined above are effective in their approach.

Conclusion on Issue 5

89. To conclude, subject to the MMs outlined above, the plan takes a justified and robust approach towards economic growth and designated centres within the Borough. The approach adopted provides an effective and sound strategy, is supported by the evidence base and conforms with national policy as well as the ALP.

Issue 6 – Does the plan provide an appropriate strategy for open spaces, water spaces and sustainable design within the Borough? Is it consistent with national policy and the ALP?

The effectiveness of the Open Space policies

90. There are a number of important publicly accessible open spaces within the Borough. However, the Plan acknowledges the overall level of provision is low when compared with other inner London Boroughs. As a result, it is important

that the policy framework seeks to both protect and enhance the existing provision and promote and where possible, enhance provision.

91. Policies S.OWS1 and D.OWS3 set out the Plan's approach to the protection and enhancement of open spaces and indeed the open space and green grid networks across the Borough. Policy S.OWS1 seeks to protect and enhance the Borough's existing open spaces as well as promoting the creation of new publicly accessible open spaces. The policy provides clear definitions for the various open spaces within the Borough supported by clear definitions within the glossary at appendix 1 within the Plan.
92. This approach is supported by the evidence base which includes the Tower Hamlets Open Space Strategy and associated appendices (CD SED 39) 2017, Tower Hamlets Green Grid Strategy and associated appendices (CD SED 42) 2017, the Framework and the ALP. This evidence acknowledges the challenges facing the Borough in terms of green space provision. The overall level of publicly accessible open space is relatively low compared to other inner London boroughs, with acute areas of deficiency apparent in parts of the Isle of Dogs, Shoreditch and Whitechapel.
93. Policy 7.17 of the ALP stipulates that the Mayor of London strongly supports the current extent of Metropolitan Open Land (MOL). In the context of plan preparation, part D of the policy advises that in order for land to be designated as MOL, Boroughs need to establish that the land in question meets at least one of four identified criteria. The Council have advised that the Plan does not purport to carry out a review of existing the MOL boundaries. The Council state that the Plan did not necessitate any amendment to this boundary since all of the designated MOL met the criteria listed under Part D of the aforementioned London Plan Policy.
94. Notwithstanding this position, neither of the aforementioned policies refer to the MOL as part of the existing network of open space provision within the Borough. **MM13** will rectify this and ensure that the approach to MOL and its protection within the Borough is sound. The MM also corrects the naming of one of the locations identified which had been incorrectly referenced. With this modification, policy S.OWS1 effectively brings about the designation of the MOL as shown on the policies map. This modification ensures the Plan is consistent with both the ALP and the Framework on this issue.
95. Two representations received at both Regulation 18 and 19 stages of the consultation process sought to remove land from the MOL designation. I deal with each of these representations separately since they raise differing issues relating to the extent of the MOL boundary as currently defined. In relation to 82-84 Rhodeswell Road, Mile End, the Council had incorrectly concluded that this site formed part of the Mile End Park Site of Importance for Nature Conservation (SINC). There is no evidence to support this and the latest biodiversity surveys concludes the site itself has no or limited biodiversity value. Accordingly, the area of land in question would not meet the criteria identified by policy 7.17 of the ALP. The Council have acknowledged this drafting error. Given that I do not have the power to recommend main modifications to the policies map, it will be for the Council to amend the boundary of the policies map accordingly.

96. The second site is at 1-4 Canal Cottages. I have also considered the site against the criteria identified by policy 7.17 D of the ALP. The site is situated as part of Victoria Park which is grade II* and adjacent to the Union Canal. It is also located within the Victoria Park Conservation Area and part of the site is located within the SINC. I have no evidence to suggest that the land included does not fulfil this biodiversity criteria. As a result of these factors, the land would in my view meet criteria c of policy 7.17 D of the ALP. From what I have seen and from the evidence presented on this issue, the location of Canal Cottages is clearly distinguished as part of the Victoria Park and not the wider built up area. The site is surrounded on all sides by the Park save for the canal frontage. The presence of the canal clearly separates these cottages in physical terms from the wider built up area. As a result, the site would meet criteria a of policy 7.17 D of the ALP. The boundary broadly follows the building line of the properties. The site should be retained as part of the MOL.
97. Policy D.OWS3 relates to open space and the green grid network. The policy aims to protect the existing network of publicly accessible open spaces, whilst maximising opportunities to deliver new open spaces as well as enhancing accessibility and connectivity to the wider network. **MM14** is necessary to ensure the policy appropriately recognises the role of MOL in terms of open space provision across the Borough and is consistent with both the ALP and Framework in this regard.
98. In general terms, both policies contain an extensive range of terminologies in terms of the categorisation of open spaces within the Borough. However, the glossary at appendix 1 within the Plan provides clear guidance in terms of the interpretation of these terms and is sufficiently clear so as to be effective in this regard.

The effectiveness of the Plan's water space policies

99. Water space is recognised as the greatest natural asset within the Borough and given the Borough's rich Dockland heritage this is not surprising. The Tower Hamlets Water Space Study (CD SED 43) 2017 considers the importance of water space to the Borough and outlines a number of key issues to be addressed as part of the plan making process. The Borough is bounded to the south by the River Thames and to the east by the River Lea. The water spaces are made up from a variety of sources including rivers, canals, docks and basins. All of the Borough's canals and adjacent rivers are located at least in part within conservation areas with both the Regent's Canal and Limehouse Cut designated as conservation areas in their own right. They are also designated as SINCS.
100. A number of the water spaces are located in areas which are deficient in access to green space. The Water Space Study acknowledges the importance of these spaces in terms of open character and the positive contribution to the health and well being of residents as a result. The water spaces have an important and varied role in terms of representing heritage assets within the Borough, mooring locations, providing a public transport route via the Thames Clipper and walking and cycling routes where active frontages along the water spaces allow. In my view, the Water Space Study provides a suitably detailed evidence base in support of the water space policy framework within the Plan.

101. Policy S.OWS2 provides the strategic policy framework for water space within the Borough and seeks to ensure that proposals are required to support the creation of a network of high quality, useable and accessible water spaces through a number of different measures. It also seeks to ensure the water spaces are easily accessible, and that this accessibility can provide opportunities for local communities and visitors alike. The policy is sufficiently detailed and recognises the role of partnership working with both the Port of London Authority and the Canal and River Trust in achieving these objectives. The policy is appropriately justified and presents a sound approach.
102. Policy D.OWS4 provides a detailed policy for water spaces. It sets out a criteria based approach to ensuring the Borough's existing water spaces will be protected, maintained and enhanced. **MM15** proposes changes to the policy and supporting text. This MM will ensure that 'no unacceptable impacts on the openness of the water space' is recognised as a separate criterion within the policy with a corresponding change to the supporting text providing the written justification for this additional criterion. As I have explained above, given the importance of the open character of the water spaces as a defining characteristic, this modification is justified and necessary in order to ensure the policy is sound.

Sustainable Design

103. Policy D.ES7 sets out a number of standards which development is required to meet in the context of maximising energy efficiency. This approach is in accordance with the Framework and the focus that plans should develop robust and comprehensive policies which identify the quality of development which will be expected in an area. The policy and supporting text as currently drafted states that all new development and non self-contained residential accommodation over 500 sqm floorspace must meet or exceed Building Research Establishment Environmental Assessment Method (BREEAM) 'excellent' rating. However, this approach is not consistent with the Written Ministerial Statement (WMS) on this issue and the reference to non self-contained residential accommodation should be amended accordingly (**MM17**).
104. Policy D.ES3 sets out how the Plan will protect and enhance biodiversity throughout the Borough. It provides detailed guidance in terms of retaining existing habitats and features of biodiversity value as well as addressing the protection and provision of trees within the Borough. The evidence base to support this approach includes the Local Biodiversity Plan (CD SED49) 2014. In order to ensure that the policy is justified, and effective, **MM16** sets out additional explanatory text concerning replacement tree planting and how the Council will approach this in practical terms.
105. In the context of sustainable water management, policy D.ES6 identifies specific measures in terms of reducing water consumption, minimising pressure on the combined sewer network and demonstrating capacity in relation to the local water supply and public sewerage networks. In order to ensure water and wastewater network requirements are justified and effective, **MM18** introduces changes to the supporting text to clarify that developers should contact Thames Water as early as possible to assist in identifying any potential water and waste network reinforcement requirements. This addition is necessary and justified.

Conclusion on issue 6

106. To conclude, subject to the MMs outlined above, the Plan takes a justified and robust approach to delivering open spaces, water spaces and sustainable design within the Borough. The approach adopted is supported by the evidence base and conforms with both national policy and the ALP.

Issue 7 – Whether the policies concerning Tall Buildings and Heritage and the Historic Environment provide a justified and effective policy framework. Is the approach sound, does it accord with national policy as well as the ALP?

107. Chapter 3 of the Plan addresses creating attractive and distinctive places. The chapter includes a number of policies, which seek to ensure that new development is well designed, inclusive and respects the distinctive character of the Borough.

108. Policy S.DH1 is an overarching policy which seeks to ensure the delivery of high quality design across the Borough. The policy comprises a 10 point criteria based approach which is intended to outline the key elements of high quality design. The criteria identified and the wording proposed recognises the considerable variety in the built form across the Borough, including acknowledging the local character and distinctiveness of the Borough as key components of design.

109. The policy is justified in principle albeit a modification is required to provide greater effectiveness and detail to the policy wording in the form of **MM4**. This modification will ensure the policy wording at (b), (c), (f) and (h) is justified and effective and to also ensure that (h) incorporates a full range of potential harmful environmental effects. It is also necessary to ensure the supporting text is consistent with the policy wording and in order to ensure that the Plan acknowledges the correct evidence base. This approach is both consistent with national policy, and in particular paragraph 58 of the Framework which requires, amongst other things, that local plans develop robust and comprehensive policies which set out the quality of development that will be expected for an area. The approach is also consistent with chapter 7 of the ALP and the policies contained within which place a great emphasis on high quality design.

110. Policy D.DH2 is a general design-based policy concerned with creating attractive streets, spaces and public realm. The policy provides detailed guidance as to how connectivity, permeability and legibility can be improved across the Borough with additional detailed guidance in connection with making a positive contribution to the public realm. The policy as drafted is justified and effective. **MM5** provides further additional text to the supporting text to ensure the policy is justified and positively prepared and acknowledges the relevant guidance which has been produced to counter terrorism and in relation to crime prevention security. This is necessary to provide further clarification in relation to the application of the policy.

Tall Buildings

111. One of the particular challenges facing Tower Hamlets is the increasing number of tall buildings across the Borough. Tower Hamlets has become a focus for tall buildings, with 77 buildings of 20 storeys and above in the pipeline, equating to 17% of all proposed tall buildings in London¹. Policy D.DH6 seeks to introduce a new policy framework against which any new proposals will be assessed. The policy is set into three parts – the first part of the policy identifying a series of criteria against which all tall building proposals will be assessed. Part 1 of the policy contains 12 subsections and whilst I acknowledge it is a lengthy policy, it covers the fundamental considerations which will need to be taken into account in relation to any new tall building proposals.
112. Policy D.DH6 is informed by the Tall Buildings Study (CD SED10) 2018. This document provides the evidence base for the policy as to where tall building development should be directed. The Study is informed by a spatial analysis of the Borough, concluding with the identification of the tall building zones set out within part 2 of the policy. In particular, the study notes that the ALP advocates a plan led approach to tall and large buildings and that plans should identify appropriate and inappropriate locations for tall buildings. Policy 7.7 of the ALP provides specific guidance in relation to the location and design of tall and large buildings.
113. The evidence base is informed by a spatial analysis of the Borough and a review and assessment of the development pipeline for tall buildings across the Borough. The approach to the policy wording outlined by policy D.DH6 and the criteria used are reflective of the criteria set out within policy 7.7 of the ALP. In addition to this, the Urban Structure and Characterisation Study (CD SED 12) 2009 plus Addendum (2016) provide background to the individual sub areas including an assessment of individual character as well as sensitivities to change and potential areas for change. The Tall Buildings Study also sets tall buildings principles which are broad terms reflected in part 1 of policy D.DH6 and figure 9 provides a visual explanation of the principles of tall building clusters. It is my view that the evidence base in support of the tall buildings policy presents a proportionate and robust approach.
114. There is a fine balance between the policy actively acknowledging the existing and emerging development situation on the ground against the Council's policy aspirations as to where future tall buildings should be directed and providing an appropriate policy basis for this assessment to be made going forward. Additional text introduced by **MM6** states that building heights within the Canary Wharf cluster should 'step down' from the central location of One Canada Square. Taking into account the modification proposed, the policy achieves this balance.
115. Part 2 of the policy identifies tall building zones (as indicated on the policies map and figure 8) where clusters of tall buildings may be developed. All of these areas are within the CAZ and opportunity areas. Tall building zone 2 (Canary Wharf (Isle of Dogs)) covers an extensive area, and the policy text acknowledges the importance of One Canada Square within this zone. Given the prominence of this building, this approach is both justified and effective.

¹ Tall Buildings Study, CD SED10, 2018

Each of the 5 zones has specific characteristics and the design principles reflect these existing characteristics. For the Plan to be justified and positively prepared, **MM6** is necessary to strengthen the effectiveness of the policy, by introducing additional wording at criteria c, i, and l. The modification is also necessary to ensure that the text in relation to Canary Wharf (Isle of Dogs) is robust and effective, through the introduction of specific wording referencing the skyline of strategic importance. In relation to criteria (j) and (k), **MM6** originally sought to change the emphasis of the policy from 'does not adversely impact' to 'mitigate negative impacts'. In light of representations made at the MM stage, I have deleted this text from the MM as I do not consider the change in policy emphasis is necessary for soundness.

116. The Council have suggested additional policy wording emphasising that the silhouette of One Canada Square should be clearly visible in all relevant strategic views and Borough designated views, as defined by policy D.DH4. Policy D.DH4 relates to, amongst other things, the skyline of strategic importance and emphasises the role of the Canary Wharf cluster and Millwall Inner Dock cluster as part of this designation. The policy as drafted already acknowledges the iconic image and character of Canary Wharf and the central location of One Canada Square. As a result, this additional wording is neither justified or necessary for soundness and I have deleted it from the main modification accordingly.
117. There has been some debate regarding the requirement at part b of the policy to achieve 'exceptional' design quality and whether the use of this term is justified. The wording should be read as part of the policy as a whole and merely seeks to emphasise that the architectural quality sought in relation to tall buildings should be greater than usual. In order to meet the remaining policy objectives, most notably in seeking to achieve a positive contribution to the skyline (part d), the aspiration must be, at the very least, to achieve exceptional architectural quality. As a result of the size and scale of tall buildings alone, anything less could result in detrimental effects on the immediate environment and beyond. It is therefore a reasonable and justified part of the policy wording. Whilst there is no specific guidance within the Framework in relation to tall buildings, the evidence base and policy is consistent with the overall approach to design within the built environment. The criteria identified by policy D.DH6 is sufficiently detailed to ensure that there is an appropriate balance in terms of any development proposals which may come forward and the impacts on the built environment and public realm.
118. The evidence base considers in detail the existing building heights, historical developments and identifies sensitive areas such as world heritage sites, designated heritage assets and protected views and landmarks. It also provides an assessment of tall buildings in the pipeline. This work has informed the five zones/clusters identified. These zones comprise the following clusters: Aldgate, Canary Wharf, Millwall Inner Dock, Blackwall and Leamouth. Whilst the existing character and building heights represent part of this process, it does not and indeed should not follow that existing established building heights are the single most influential factor in determining whether further tall buildings are appropriate. This approach would be to assume that all existing tall buildings across the Borough have a positive impact on both the immediate and wider character of the area, when the evidence suggests otherwise.

119. I acknowledge that a number of representors have put forward that the tall buildings zone are too narrowly defined, do not reflect the existing situation on the ground and should be broader in scope. For the policy to be effective, it must naturally exclude specific areas of the Borough. The evidence base provides a proportionate approach to supporting the tall buildings zones as defined within the Plan and the extent of the tall buildings zones are suitably informed and justified by the evidence base and the characterisation work which has been undertaken.
120. **MM6** also introduces replacement wording for part 3 of the policy and is necessary to ensure that the policy is justified and effective and can respond to the development pressures outside of the tall building zones in the most appropriate manner. Additional supporting text proposed after paragraph 3.73 will assist with this objective, highlighting the importance of avoiding the merging of clusters and reinforcing the step down approach to development as highlighted by figure 9. In order to ensure the policy is justified and effective, **MM32** provides a definition of 'Tall Buildings' within the glossary contained at appendix 1 to the Plan, consistent with other key terminology definitions within the Plan.
121. Incorporating **MM6**, the policy provides a clear and justified approach to appropriate locations for tall buildings which can positively respond to the context and character of the surrounding area. Nevertheless, part 3 of the policy provides criteria for assessing the development of tall buildings outside of these zones. The tall buildings study also acknowledges that there may well be opportunities for tall buildings across the Borough where they act as landmarks. On balance, the approach set out within the policy is both justified and effective.
122. Overall and subject to the MMs outlined above, the policy approach to tall buildings development within the Borough is both justified, balanced and suitably supported by the evidence base.

Shaping and Managing Views

123. The requirement for policies relating to views within the Borough is justified by the evidence base which includes the Topic Paper entitled Views and Landmarks (CD SED15) 2018 as well as the London View Management Framework (CD SED14). The ALP has two policies relating to the London View Management Framework in the form of policy 7.11 and 7.12 which define strategically important landmarks and views within London. In the context of Tower Hamlets, this relates to Tower of London and Greenwich Maritime World Heritage Sites and the wider setting of the views of St Paul's Cathedral from Westminster Pier and King Henry VIII's Mound in Richmond Park. The policies go on to set a framework for assessing proposals which may affect these designations. Part J of policy 7.12 identifies that Boroughs should reflect the principles of this policy for the designation and management of local views.
124. Policy D.DH4 requires development to positively contribute to views and skylines that make up the character of individually defined places within Tower Hamlets. The policy will require development proposals to demonstrate how they will positively contribute to the skyline of strategic importance as well as preserving or enhancing Borough designated views and Borough designated

landmarks. Each of these individual skyline/landmark characteristics are clearly defined in the supporting text. The skyline of strategic importance designated within the submission version of the Plan covered the tall buildings zones of Canary Wharf and Millwall Inner Dock. However, the Council are proposing to modify this boundary by limiting the extent of this area to reflect the Canary Wharf tall building zone only. This is to ensure that the policy is effective. This will necessitate a change to the adopted policies map in accordance with the schedule of changes to the policies map already consulted on (CD LBTH/LP/008). It will also require a corresponding change to figure 7 of the Plan and I have added **MM34** to the schedule of MMs in order to address this. Although this modification was not consulted on, the reduction of the skyline of strategic importance was (CD LBTH/LP/008) and therefore no prejudice would be caused by my adding this MM to the schedule. Subject to the addition of the MM and on the basis of the evidence base presented, policy D.DH4 presents a reasonable and justified approach to shaping and managing views within the Borough.

Heritage and the Historic Environment

125. There is a rich and diverse historic heritage within the Borough encompassing a diverse and broad range of scheduled monuments, listed buildings and conservation areas. Policy S.DH3 defines how development proposals affecting the historic environment should be assessed and has been informed by the Tower Hamlets Conservation Strategy (CD SED11), Tower Hamlets Urban Structure and Characterisation Study Addendum and appendices (CD SED12) and the Tower Hamlets Conservation Area Appraisal and Management Guidelines (CD SED13). The policy places an emphasis on enhancing the distinctiveness of the Borough's defined 24 places. The approach provides an effective policy framework on such issues which is justified and consistent with national policy. The policy is also consistent with the ALP and in particular policies 7.8 and 7.9.

Conclusion on Issue 7

126. Subject to the MMs identified above, the policies concerning both tall buildings and heritage and the historic environment are justified and effective. They present a sound approach which accords with both the ALP and the Framework.

Issue 8– Are all the site allocations identified suitably justified by the evidence base, has the site selection process been based on a robust approach and are the sites deliverable and viable?

127. Paragraph 47 of the Framework requires local planning authorities to identify and update annually a supply of deliverable sites sufficient to provide five years' worth of housing requirements. The Framework goes on to note that local planning authorities should also identify a supply of specific deliverable sites or broad locations for growth, for years 6-10 and where possible for years 11-15.

128. The housing trajectory contained within the Plan sets out the existing pipeline of housing provision (i.e. those sites with planning permission which are already under construction) as well as identifying sites to deliver future housing growth in accordance with the Framework.

129. In order to inform this process, the GLA's Strategic Housing Land Availability Assessment (CD SED74) 2017 was used as a primary evidence source. This document assisted the Council in identifying appropriate housing capacity within the Borough. As with all site selection processes, the Council have utilised selection criteria. This includes that the site should be capable of delivering more than 500 net additional homes (in accordance with the ALP policy 3.7) or be above 0.25 hectares. There were arguments that this criteria was too narrow, and sites which could deliver a smaller number of homes should not have been discounted so early in the process. However, the Borough is looking at achieving one of the highest housing targets across London. It has a proven track record of delivering high density large scale development. The use of a threshold level in terms of the site sifting process is reasonable and proportionate approach to the task in hand.
130. The Site Allocations Methodology (CD SED64) sets out the Council's methodology for identifying sites to meet the identified growth needs over the Plan period. It details 5 stages in the form of detailed assessments to identify the most suitable sites for allocation. At each stage of the assessment, the sites are scored and weighted accordingly. Appendix 5 to the report details the final site assessment, where each of the site allocations are assessed for their suitability, availability, achievability and infrastructure requirements. Overall, it is my view that the sites were assessed against an appropriate range of criteria and the site selection process used has been robust.
131. In light of the above evidence base, the SA makes a proportionate assessment of the site allocations proposed. The 21 site allocations proposed are divided amongst the 4 sub areas defined earlier in the Plan. For each individual sub area, a vision setting out what the Plan anticipates can be achieved during the Plan period is identified. Several key objectives are then identified for each sub area to realise the vision. In addition, a number of guiding principles are set out for each sub area. Where relevant, these principles acknowledge land use and infrastructure provision as part of any existing planning consents within the individual sub areas. The design principles provide a sufficient level of detail so as to enable the effective delivery of the site. The Council are proposing to remove all of the indicative plots and active ground floor uses which had been annotated on the individual figures for each of the sites, as well as ensuring the figures are noted to be for '*illustrative purposes only*'. Whilst these amendments are not necessary for soundness, it does ensure that the detailed layout of each site can be fully informed by the design principles identified.
132. In the context of the City Fringe, **MM20** provides additional wording regarding the provision of necessary and suitable bus facilities in Whitechapel and supporting the existing and future operations of such facilities. This wording is necessary to ensure that the objectives are deliverable in the context of sustainable development. This approach is both supported by the evidence base and the policies contained within the Plan.
133. The PPG provides guidance in terms of viability and plan making. It advises that the evidence prepared should be proportionate to ensure plans are underpinned by a broad understating of viability. The viability work for the Plan comprises the Local Plan Viability Assessment (CD SED5). This report provides a broad assessment of viability in relation to the site allocations

proposed, taking into account the different types of development likely to come forward over the plan period, as well as the requirements of other local plan policies. The assessment indicates that a majority of the proposed site allocations will be able to deliver a policy compliant level of affordable housing.

134. For sites which are due to be delivered outside of the first five years, there are specific cases where the level of affordable housing provision or tenure mix demonstrate that the site is unviable. In order to address this, the addition of **MM19** will introduce greater flexibility to the application of policy requirements in the site allocations and is necessary for the policy to be justified and effective. The wording introduced will allow for flexibility to be applied to the site allocation requirements based on an up-to-date assessment of need and agreed viability position of the scheme. This is a justified approach in order to ensure the policy is effective.
135. Taking into account the viability evidence presented, such flexibility introduced by the above modifications is justified and necessary for soundness. The viability work has been scrutinised as part of this examination process. On the basis of the evidence presented, I conclude that the viability work is both proportionate to the purpose of supporting the Plan and will not undermine the delivery of the site allocations and therefore the Plan overall.
136. In general terms, a number of representors commented that the individual site allocation policies should set minimum indicative housing numbers, either through identifying upper or lower limits to development. The viability work has utilised the London Plan density matrix to inform site capacity. I acknowledge that within Tower Hamlets, this can present a relatively conservative picture in terms of site capacity, and the Council have provided detailed evidence of examples of schemes delivering at higher density rates. Some sites are at an advanced stage, have planning permission in place, and in some cases development may be well underway. Other sites are not envisaged to contribute towards the supply of housing until well towards the end of the plan period. In the context of the Framework, paragraph 157 advises that site allocations should provide detail on the quantum of development where appropriate. In light of the above evidence, the Council have taken a consistent and justified approach to this matter. In the circumstances of Tower Hamlets, I do not consider that capacity indicators or limits to development in numerical terms are appropriate or indeed necessary for the Plan to be found sound.
137. I do not propose to address all of the site allocations within my report where there is an absence of matters that require further examination or clarification. For ease of reference, I have utilised the site names as well as the site allocation reference numbers contained within the Plan.

Marian Place Gas Works and the Oval (1.3)

138. This site is located within the City Fringe sub area. It is identified within the Plan as being suitable for a range of land uses including housing, employment and community and social uses. The design principles place a proportionate emphasis on the existing designated and non designated heritage assets on and adjacent to the site including the gasholders, Regent's Canal Conservation Area and the Hackney Road Conservation Area. Given the importance of these

assets, this is a justified and appropriate approach. **MM21** clarifies that the gasholders on the site do not accommodate any employment floorspace and thus makes the position clear regarding the re-provision of such floorspace as part of any redevelopment proposal. This MM is necessary as the site is located within the Cambridge Heath LEL whereby employment floorspace is afforded protection under policy D.EMP3. The MM will ensure the effective delivery of the site allocation.

139. Cost estimates have been provided for the retention of the gas works structures on the site. As a result, additional viability work has been undertaken by the Council in conjunction with the developer and an additional SOCG has been prepared between the two parties on this matter. I acknowledge that concerns have been raised regarding a number of the assumptions used within this work and alternative variables have been presented. I am satisfied that the figures provided are sufficiently robust and present a suitable if not cautious approach for the purposes of the Local Plan viability work. Sufficient evidence has been provided to justify the assumptions used within the appraisal work undertaken. Put simply, it is not necessary for the methodology for decontamination and decommissioning of the gasholders to be identified or indeed agreed in order for the Plan to be found sound.

140. Taking into account these indicative costs, the viability work to date indicates that the site may not be able to viably deliver all of the policy requirements contained within the Plan. The appraisal work allowing for retaining both of the gas structures illustrates that 20-25% affordable housing would be viable. As a result, the inherent flexibility introduced by **MM19** to the site allocation requirements as well as **MM2** and **MM3** to policy D.SG5 in relation to developer contributions allows for such situations to be addressed accordingly. Furthermore, the site is not envisaged to contribute towards the housing land supply within the Borough until beyond 2023. On balance and based on the evidence presented, the evidence base and policy wording ensure that the site's inclusion within the Plan is sound.

Whitechapel South (1.4)

141. Also within the City Fringe sub area, this site allocation envisages employment and housing development, with an emphasis on employment uses focusing on life sciences, medical and research uses. This emphasis is supported by both the City Fringe Opportunity Area as well as the Whitechapel Masterplan Vision SPD. Through **MM22**, the provision of a district heating facility is removed as an infrastructure requirement and replaced as a delivery consideration. This is necessary to ensure the Plan is capable of effective implementation. In addition, **MM22** also provides the rewording of the reference to the existing sexual health facility on site to ensure that it is re-provided as part of any redevelopment proposal. This is both justified and necessary for soundness. Overall, the allocation is adequately justified by the available evidence and is sound.

Bow Common Gas Works (2.1)

142. This site comprises one of two allocations within the Central sub area. The allocation envisages both housing and employment uses as well as open space

provision and a secondary school. Subject to a modification to acknowledge that the gas holders did not provide employment use which is required to be re provided as well as an acknowledgement concerning the decommissioning of the gasworks (**MM23**), I find that the allocation is justified, sound and capable of effective implementation.

Chrisp Street Town Centre (2.2)

143. This is the second site allocation within the Central sub area, with the land use requirements focusing on retail and other compatible town centre uses as well as housing. The infrastructure and land use requirements have in part been influenced by the current planning application proposal for the site. The allocation is justified adequately by the available evidence, subject to a modification required to figure 31 to illustrate Kerbey Street as a strategic pedestrian/cycling route, (**MM24**) the allocation is sound.

Leven Road Gas Works (3.2)

144. The site is allocated for housing and employment use. Infrastructure requirements are identified as strategic open space and provision of a secondary school. Flexibility can be applied to these policy requirements as introduced by **MM3**, particularly in relation to the secondary school provision. **MM25** is necessary as it clarifies that prior to their demolition, the gasholders on the site did not accommodate any employment floorspace and thus makes the position clear regarding the re provision of such floorspace as part of any redevelopment proposal. This is necessary for the effective delivery of the site allocation. Subject to this MM, the allocation is sound.

Aspen Way (4.1)

145. The site is located within the Isle of Dogs and South Poplar sub area where there is the greatest concentration of site allocations across the Plan when considered as a whole. The site, which is located north of Aspen Way, has a number of infrastructure and land use requirements including strategic open space, the re-provision of an existing College facility, and the re-provision of a community centre and associated football pitches.

146. I am mindful of the different views expressed regarding the site's redevelopment during the examination. In terms of the height and scale of development which may or may not be permissible here, I do not propose to reiterate the conclusions I have already drawn above in relation to the tall buildings policy.

147. The site is in multiple land ownerships. There are clearly a number of land use and infrastructure requirements which will need to be addressed as part of any development proposal for the site. In order to ensure the effectiveness of the policy, **MM26** is necessary to include reference to the re-provision of the Docklands Light Railway (DLR) depot which will be a fundamental part of any scheme, as will maintaining the operation and service requirements as part of the site's redevelopment. In addition, the MM also includes reference to the improvement and enhancement of the existing pedestrian bridge over Aspen Way and routes to it. This modification strengthens the importance of these improvements which are also reflected within the design principles section of the policy.

148. The policy identifies the factors which will need to be considered in bringing forward any development proposals for the site. Given the strategic infrastructure requirements in terms of the site's redevelopment and the requirement for the re-provision of the DLR depot, the timing and phasing of any such development will be critical to its deliverability. The Council's trajectory indicates that the site will not deliver any units until 2021-2031. This development timetable aligns with the timeframe indicated for the adjacent site at Billingsgate Market (4.2). This site allocation includes reference to improving walking and cycling connections to and from the site, addressing the physical barrier of Aspen Way. I note the suggestion that the site should provide a new pedestrian link. Whilst that may be desirable, I have been given no compelling evidence to suggest such a link would be deliverable or viable. In this context, I consider the issues of connectivity and permeability between site 4.1 and the neighbouring allocations are adequately addressed by the existing policy wording contained within these site allocations. No further amendments are necessary for soundness in this regard.

149. Overall, I am satisfied that the allocation is justified, capable of effective implementation and therefore sound.

Milharbour (4.8)

150. This site has a number of prominent frontages including those to Marsh Wall and the Millwall Inner Dock. The infrastructure requirements are tailored towards a current planning application proposal and include open space, a health facility and, with the addition of **MM27** which is necessary for soundness, the re-provision of an existing secondary school. This is necessary as the Council are committed to the provision of a secondary school on the City Gateway College portion of the site. Subject to this MM, the allocation is justified and effective.

North Quay (4.9)

151. North Quay is a development site which runs on the southern side of Aspen Way. The site already has planning permission and the scheme currently being implemented will meet the land use requirements identified within the site allocation. The policy states that development should not undermine the delivery of the long term aspiration to provide new bridges or decking over Aspen Way. In the context of this site allocation, this policy wording is appropriate and justified. I am aware that the Council have considered amending the wording so that the emphasis would be on supporting/enhancing a new bridge(s) over Aspen Way to better connect Poplar and Canary Wharf. The policy wording as drafted already acknowledges improving strategic links from Canary Wharf to Poplar High Street in a proportionate way. I have no evidence to suggest that such a bridge link would comprise a viable or deliverable aspect of the scheme. As a result, I am not convinced that specific wording to support enhanced/new bridges is either necessary, justified or supported by the evidence base.

152. **MM28** seeks to introduce additional wording in relation to the design principles which includes reference to a new east to west pedestrian/cycle route through the site which will facilitate connections to the wider movement

network. I fully accept that there are significant variations in levels across the site. The proposed wording put forward by the modification acknowledges this by referencing the wider movement network rather than being specific to cycle networks. It introduces sufficient flexibility to the policy and will be addressed as part of any proposal for the site including the remaining design principles.

153. To give effect to site allocation 4.9, the Council will also need to update figures 19, 38, 39 and 48 as reflected by **MM28** as well as the adopted policies map to more accurately reflect the planning application boundary to ensure the policy is capable of effective implementation in accordance with the schedule of changes to the policies map already consulted on (CD LBTH/LP/008). Subject to the addition of the MM, the site allocation is sound.

Reuters (4.10)

154. This is a further site allocation along Aspen Way which sits flush to the river. Part of the site boundary as drawn includes an existing datacentre. The operators have advised that this part of the site is not available for development and will not be throughout the plan period. On the basis of this evidence and to give effect to site allocation 4.10, the Council will need to update the adopted policies map to exclude this part of the site from the allocation to ensure the site is deliverable during the plan period in accordance with the schedule of changes to the policies map already consulted on (CD LBTH/LP/008). The Council will also need to update figures 19, 38, 39 and 49. **MM33** provides for this corresponding change to the figures within the Plan. Although this modification was not consulted on, the removal of this part of the site was (CD LBTH/LP/008) and therefore no prejudice would be caused by my adding this MM to the schedule. Subject to the addition of the MM, the site allocation is sound.

Westferry Printworks (4.12) and Wood Wharf (4.13)

155. Both of these site allocations require modifications in the form of **MM29** and **MM30** respectively to amend the site boundaries within the plan in order for the site allocations to be deliverable. This change necessitates a change to figures 19, 38 and 39 as well as figures 51 (Westferry Printworks) only and figure 52 (Wood Wharf) only. These modifications are both necessary for soundness and consistency across the plan, to ensure that the sites are shown accurately reflecting recent planning applications and to ensure the deliverability of the sites over the plan period. The Council will need to update the adopted policies map to reflect these changes in accordance with the schedule of changes to the policies map already consulted on (CD LBTH/LP/008). Subject to the addition of these MMs, the site allocations are sound.

Conclusion on Issue 8

156. Overall and subject to the MMs identified, the site allocations proposed as part of the Plan are both justified by the evidence base and of a sufficient level of detail so as to be effective in their deliverability and viability to be sound.

Issue 9 – Are the monitoring targets identified justified and at an appropriate level of detail for the Local Plan?

157. Part 5 of the Plan identifies how the vision and policies set out within the Plan will be monitored and delivered against an extensive number of key indicators. It sets out in detail how each of the chapters of the Plan will be effectively monitored according to the individual objectives. Regular monitoring will also be undertaken in relation to the key monitoring indicators and targets identified by the Plan, which will be used to assess the effectiveness of the plan's policies as part of the AMR.
158. For reasons of effectiveness, **MM31** introduces additional targets and adjusts the indicators to a number of the key monitoring indicators identified which are necessary for soundness in order to ensure that the monitoring envisaged by the Plan is effective. A new indicator will be the delivery of primary and secondary school provision through the site allocations. The target will ensure that primary and secondary school provision will be delivered at a rate which keeps pace with the level of need identified by the Planning for School Places document. Without this indicator, the approach to school place provision which I have detailed above would be unsound.
159. Furthermore, the modification also introduces two new indicators and targets in relation to improving connectivity and travel choice. These include a target of decreasing the private car modal share from the baseline level (2016) and also monitoring the level of crowding on a number of key public transport routes within the Borough. Both of these are directly applicable to policy S.TR1 which requires, amongst other things, travel choice and sustainable travel to be improved within the Borough and beyond.
160. Subject to this modification, the effectiveness of the Plan can be monitored appropriately through the mechanism identified.

Conclusion on Issue 9

161. In conclusion and subject to **MM31** outlined above, I am of the view that the level of detail contained within the monitoring section of the Plan is appropriate, justified and effective.

Assessment of Legal Compliance

162. My examination of the legal compliance of the Plan is summarised below. I conclude that all aspects of legal compliance are met.
- The Local Plan has been prepared in accordance with the Council's Local Development Scheme (CD SD09) dated February 2018.
 - Consultation on the Local Plan and the MMs was carried out in compliance with the Council's Statement of Community Involvement (SCI) which was adopted in September 2017.
 - The Sustainability Appraisal has been carried out and is adequate.
 - The Integrated Impact Assessment (CD SD6) September 2017 and updated in March 2019 includes both the Sustainability Appraisal and the Habitats Regulations Assessment and sets out why an appropriate assessment is not necessary.

- The Local Plan includes policies designed to ensure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.
- The Local Plan is in general conformity with the spatial development strategy (the adopted London Plan).
- The Local Plan complies with all relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.
- I have had due regard to the aims expressed in S149(1) of the Equality Act 2010. The Council's IIA includes an Equalities Impact Assessment which confirms that the two strategic objectives of the Plan will ensure that growth contributes to identified social and economic need and also ensuring that the principle of that growth will help reduce social, economic and environmental inequalities. As a result of the policy framework set by the Plan, I confirm I have had regard to the Equalities Act 2010 in reaching my conclusions on this matter.
- A number of the site allocations will assist in securing development and the use of land which will contribute to the mitigation of, and adaptation to, climate change. Accordingly, the plan taken as a whole, achieves this statutory objective.

Overall Conclusion and Recommendation

163. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

164. The Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix, the Tower Hamlets Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Christa Masters

Inspector

This report is accompanied by an Appendix containing the Main Modifications.

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Appendix: Main Modifications

The main modifications below are shown in *italics* (deletions are in bold strikethrough text and additions are underlined in bold) or described in words. The page numbers and paragraph numbering below refer to the submitted Tower Hamlets Local Plan.

Ref	Policy / figure / paragraph / site allocation	Proposed modification
MM1	Policy D.SG3: Health impact assessments Part 1	<p><i>1. The following developments are required to complete and submit a rapid health impact assessment as part of the planning application.</i></p> <p>a. Major developments. <u>a. b. New Major</u> development within an area of sub-standard air quality (as <u>designated and</u> shown on the Policies Map). <u>b. e.</u> Developments which contain any of the following uses:</p> <ul style="list-style-type: none"> <i>i. Education facilities.</i> <i>ii. Health facilities.</i> <i>iii. Leisure or community facilities.</i> <i>iv. A5 uses (hot-food-takeaways).</i> <i>v. Betting shops.</i> <i>vi. Publicly accessible open space.</i>
MM2	Policy D.SG5: Developer contributions Part 2	<p>Insert a new criterion after part 1:</p> <p><u>2. For site allocations the policies set out in this plan may be applied flexibly to ensure that the sites are viable and deliverable.</u></p>
MM3	Policy D.SG5: Developer contributions After paragraph 2.45	<p>Insert new paragraph and renumber the paragraphs accordingly:</p> <p><u>2.46 Part 2 seeks to provide flexibility in the determination of planning applications relating to the site allocations (as outlined in section 4) to ensure that development is viable and can be delivered during the plan period, having regard to the provision of infrastructure and other site specific requirements set out in the plan.</u></p>

MM4	Policy S.DH1: Delivering high quality design	<p>1. Development is required to meet the highest standards of design, layout and construction which respects and positively responds to its context, townscape, landscape and public realm at different spatial scales, including the character and distinctiveness of the borough's 24 places (as shown on figure 4) and their features. To achieve this, development must:</p> <p>a. be of an appropriate scale, height, mass, bulk and form <u>in its site and context</u>;</p> <p>b. represent good urban design: provide coherent building lines, roof lines and setbacks; roof lines and roof forms, complement street scape rhythm and associated landscapes (including boundary treatment); and other streetscape elements as well as ensure optimal plot coverages to avoid over-development;</p> <p>c. ensure the architectural language: scale, composition and articulation of a building form, design of detailing, elements and materials applied on elevations; roof forms and landscapes (including boundary treatment) reflects complements and enhances their immediate and wider surroundings;</p> <p>d. protect important views of and from landmark buildings and vistas;</p> <p>e. use high quality design, materials and finishes to ensure buildings are robust, efficient and fit for the life of the development;</p> <p>f. create well-connected, inclusive and integrated spaces and buildings which can be easily adaptable to different uses and the changing needs of users;</p> <p>g. incorporate features of positive biodiversity value within the site, where possible;</p> <p>h. take into account the effects on the microclimate and use design and construction techniques to reduce and mitigate the impact of noise, overheating and air pollution that ensure that the development does not result in unacceptably harmful impacts arising from overheating, wind, air pollution, light pollution and noise pollution and the loss of sunlight and daylight, whilst optimising energy and waste efficiency; and</p> <p>i. provide a mix and range of publicly accessible open spaces and waterspaces that promote biodiversity, health and well-being.</p>
	Policy S.DH1: Delivering high quality design Paragraph 3.6	Parts a to c provide detailed guidance to ensure that the design, siting and layout of new development is considered in the wider context and is sensitive to the existing character and identity of the area, taking account of the opportunities to improve health and well-being.
	Policy S.DH1: Delivering high quality design After paragraph 3.9	Add new paragraph and renumber subsequent paragraphs accordingly: <u>3.10 Part g will be considered against the objectives set out in the Tower Hamlets Local Biodiversity Action Plan in line with policy D.ES3.</u>
MM5	Policy D.DH2: Attractive streets, spaces and public realm Paragraph 3.18	In addition, part 1 seeks to embed the principles of secured by design into the design and layout of new development. <u>Developers should refer to the relevant guidance in relation to counter-terrorist and crime prevention security and engage fully in the pre-application process in order to ensure that measures to mitigate risks are incorporated into developments, where appropriate.</u>

MM6	Policy D.DH6: Tall buildings	<p>1. Developments with tall buildings are required to:</p> <p>a. be of a height and scale, mass and volume that are proportionate to their role, function and importance of the location in the local, borough-wide and London context; and take account of the character of the immediate context and of their surroundings;</p> <p>b. achieve exceptional architecture quality and have innovative and sustainable building design, using robust and durable materials throughout the building;</p> <p>c. enhance the character and distinctiveness of an area without adversely affecting established designated values townscapes and landscapes (including building/roof lines) or detracting from important landmarks, heritage assets, key views and other historic skylines, and their settings;</p> <p>d. provide a positive contribution to the skyline during both the day and night time;</p> <p>e. not prejudice future development potential of adjacent/neighbouring buildings or plots;</p> <p>f. maintain adequate distance between buildings to ensure a high quality ground floor experience and enhanced residential environment;</p> <p>g. demonstrate consideration of public safety requirements as part of the overall design, including the provision of evacuation routes;</p> <p>h. present a human scale of development at street level and comprise an attractive and legible streetscape that takes into account the use of the public realm for a variety of users and includes active uses at ground floor level;</p> <p>i. provide high quality private and communal open space, play areas and public realm (where residential uses are proposed) for which occupants local residents of the building can use and where appropriate provide shared facilities at the ground floor level to that encourage social cohesion;</p> <p>j. demonstrate that the development does not adversely impact on the microclimate and amenity of the application site and the surrounding area;</p> <p>k. demonstrate that the development does not adversely impact on biodiversity and open spaces, including watercourses and water bodies and their hydrology; and</p> <p>l. comply with cCivil cAviation requirements and not interfere to an unacceptable degree with telecommunications, television and radio transmission networks and river radar equipment.</p>
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2. Development of tall buildings will be directed towards designated Tall Building Zones (as shown on the Policies Map and figure 8) and must apply the following design principles, **having regard to the Tall Buildings Study and other relevant policies.**

Tall building zone	Principles
Canary Wharf (Isle of Dogs)	<ul style="list-style-type: none"> • Development within this location will be expected to <u>positively contribute to safeguard</u> the skyline <u>of strategic importance</u> and <u>maintain preserve</u> the iconic image and character of Canary Wharf as a world financial and business centre • Individual buildings should be integrated into urban super blocks set in the public realm. • Building heights within the Canary Wharf cluster should <u>drop away step down</u> from the central location at One Canada Square.

~~**3. Development of tall buildings proposed outside of these zones must:**
a. significantly strengthen the legibility of a town centre or mark the location of transport interchange
or other location of civic or visual significance within the area;
b. provide sufficient distance from other landmark buildings or clusters to create a landmark
in the townscape;
c. unlock significant infrastructure constraints; and/or
d. deliver significant additional publicly accessible open space~~

3. Outside these zones, tall building proposals (including those on site allocations) will be supported provided they meet the criteria set out in part 1 and can demonstrate how they will:

- a. be located in areas with high levels of public transport accessibility within town centres and/or opportunity areas;**
- b. address deficiencies in the provision of strategic infrastructure;**
- c. significantly strengthen the legibility of a Major, District or Neighbourhood Centre or mark the location of a transport interchange or other location of civic or visual significance within the area; and**
- d. not undermine the prominence and/or integrity of existing landmark buildings and tall building zones (taking account of the principles set out in figure 8).**

Policy D.DH6:
Tall buildings

After
paragraph
3.73

Create a new paragraph and re-number subsequent paragraphs accordingly:

Proposals involving tall buildings on the edge or within the vicinity of tall building zones will be expected to follow the step down approach from the cluster and demonstrate how they will avoid the merging of clusters and be sensitive to the height of the surrounding context. Building heights in the adjacent tall building zone will not be considered to set a precedent for inappropriate heights on adjoining sites.

MM7	Paragraph 4.10	<i>If our targets are not being met, we will undertake an update review of the Local Plan to explore ways of addressing this unmet need, taking into account the outcomes of future revisions to the London Plan and opportunities to increase the supply of housing as detailed in section 5 below. Triggers and timescales for an update are outlined in section 5.</i>
MM8	Policy S.H1:Meeting housing needs	<p><i>2. Development will be expected to contribute towards the creation of mixed and balanced communities that respond to local and strategic need. This will be achieved through:</i></p> <p><i>a. setting an overall target for 50% of all new homes to be affordable, to be achieved through:</i></p> <p><i>i) securing affordable homes from a range of council-led initiatives;</i></p> <p><i>ii) requiring the provision of affordable housing contributions on sites providing 2 to 9 10 new residential units against a sliding-scale target (subject to viability);</i></p> <p><i>iii) requiring the provision of a minimum of 35% affordable housing on sites providing 10 11 or more new residential units (subject to viability); and</i></p> <p><i>iv) requiring a mix of rented and intermediate affordable tenures to meet the full range of housing needs.</i></p>
	Policy S.H1:Meeting housing needs Paragraph 4.18	<i>Part 2 sets a target of achieving 50% affordable homes through private development as well as council-led initiatives. This target is considered to best reflect local housing need. On developments that yield 10 11 or more net additional residential units, at least 35% affordable housing is expected. Developments are expected to maximise the provision of affordable housing, having regard to availability of public subsidy, implications of phased development (including provision for re-appraising scheme viability at different stages of development) as well as financial viability which should, in particular, take account of prevailing local and regional viability guidance. Applicants are strongly encouraged to meet or exceed the delivery of 35% affordable housing. Lower levels will only be accepted in exceptional circumstances where robustly justified through viability evidence and where it is demonstrated that there are clear barriers to delivery.</i>
	Policy S.H1:Meeting housing needs After paragraph 4.19	<p><i>4.19 Affordable housing calculations will be made using habitable rooms.</i></p> <p>4.20 <i>Given the extent of local need, it is considered necessary and appropriate to seek financial contributions towards the provision of affordable housing from sites of less than 10 units. Financial contributions will be calculated using our preferred methodology as set out in the Planning Obligations Supplementary Planning Document. Over the plan period, developments on small sites have the potential to contribute over 3,000 new homes and could make a significant contribution towards meeting local affordable housing need (see appendix 7). Financial contributions will be calculated using a sliding-scale target starting at 3.5% across the whole site and increasing to 3.5% for each additional home, reaching 35% for sites of 10 11 units or more. Further detail (including on financial viability assessments) is provided in the developer contributions policy (D.SG5) and in the latest Planning Obligations Supplementary Planning Document.</i></p> <p>Renumber subsequent paragraphs accordingly</p>

	<p>Policy S.H1: Meeting housing needs</p> <p>Paragraphs 4.17/4.18</p>	<p>Delete part 5 of the policy:</p> <p><u>5. Residential development should encourage increased housing sales to Londoners, preferably for owner occupation.</u></p> <p>Delete paragraph 4.26 and replace with the following paragraph (to be inserted between paragraphs 4.17 and 4.18):</p> <p><u>Part 2 requires development to respond to local and strategic market housing need. There is a concern at a regional level that a portion of new build homes in London are not being used in a way which meets housing need and GLA-commissioned research indicates that Tower Hamlets has the second highest percentage of overseas sales in London. NEW FOOTNOTE Developers are encouraged to make a voluntary ‘first dibs’ offer to the Mayor of London or participate in any replacement initiative which encourages the marketing of new homes for sale to Londoners in the first instance and/or provides Londoners with an opportunity to purchase new homes before they are marketed overseas – particularly lower cost homes.</u></p> <p><u>NEW FOOTNOTE: Overseas Investors in London’s New Build Housing Market</u></p> <p>Amend paragraphs accordingly</p>
MM9	<p>Policy D.H2: Affordable housing and housing mix</p>	<p>2. Development is required to maximise the delivery of affordable housing on-site.</p> <p>d. <u>Where a housing development has been permitted and the permission is either subsequently amended (e.g. by means of a variation) to provide more units, or the existing development is extended to provide more units by the granting of a new permission</u> Development which provides further housing units either through an amendment to a current permission or an application to extend an existing development on the same or an adjoining site <u>which is physically or functionally linked; (where the extension is reliant on the existing permission or development to function or to meet policy requirements or standards required elsewhere in the plan), the new units will be considered as part of the existing development and</u> the affordable housing calculation for the new units will <u>reflect the whole development be based on the combined number of units.</u></p>
	<p>Policy D.H2: Affordable housing and housing mix</p>	<p>5. Estate regeneration development schemes are required to:</p> <p>a. protect and enhance existing open space and community facilities;</p> <p>b. protect the existing quantum of affordable and family units, with affordable units re-provided with the same or equivalent rent levels;</p> <p>c. provide an uplift in the number of affordable homes; and</p> <p>d. <u>bring existing homes up to the latest decent homes standard</u> include plans for refurbishment of any existing homes to the latest decent homes standard.</p>

	<p>Policy D.H2: Affordable housing and housing mix</p> <p>Paragraph 4.36</p>	<p><i>Part 2 (d) refers to incremental development. This is housing development where permission is subsequently amended (e.g. by means of a variation of the extant planning permission) to the extent that the amended development would provide new units or the existing development is extended to provide new units by the granting of a new permission on the same or an adjoining site where the units would be physically or functionally linked extend the existing development (e.g. sharing by relying on a common access core or on the existing amenity space or other communal facilities in order to meet the policy requirements or standards required elsewhere in the plan) and the linked development would provide new units. In these circumstances, we consider the new units to be part of the existing development and the affordable housing requirements will be calculated accordingly, taking into account the affordable housing already delivered or secured. In both cases, where the amended or linked development would provide 11 10 units or more in aggregate, affordable housing should be provided, as per in accordance with policy S.H1 (part 2 aiii) and parts 1 and 2 (a to c) above. If it would result in less than 11 10 new units in aggregate, policy S.H1 (part 2 aii) will apply. If lower than policy compliant levels of affordable housing for the total scheme (as amended or extended) are proposed, this will only be accepted where robustly justified through The recalculation will be undertaken via a financial viability assessment, in line with the our latest guidance (as outlined in paragraph 4.18). The financial viability information should be proportionate to the scale of change and time elapsed between the existing approval or development and the proposed amendment or extension.</i></p>
	<p>Policy D.H2: Affordable housing and housing mix</p> <p>Paragraph 4.37</p>	<p><i>Part 3 requires proposals to provide a range of unit sizes. Unit size distribution will be calculated by unit numbers and not habitable rooms. Developments may be required to meet updated needs as a result of monitoring. Where a development proposes to deliver at least 35% affordable housing (to use the fast track approach) and in exceptional circumstances (for example, where applications propose to deliver a significantly higher quantum of affordable housing than 35%, whilst meeting the required affordable housing tenure mix, and/or propose to deliver significant social infrastructure on-site), we will consider a different housing mix, having regard to the following factors:</i></p> <ul style="list-style-type: none"> <i>• The proposal must meet the tenure split requirements outlined in part 1.</i> <i>• Proposals will be expected to meet our affordable housing product requirements outlined in paragraphs 4.29 and 4.30.</i> <i>• Greater unit mix flexibility can be applied to the market tenure unit mix, as opposed to the unit mix for affordable housing. However, the scheme must still provide a significant proportion of family housing in the market tenure and proposals will be expected to meet our unit mix requirements to deliver family housing in the affordable tenures.</i> <p><i>The use of the fast track threshold approach where the unit mix and affordable housing product split is not being met must be confirmed as acceptable by our affordable housing team.</i></p>
MM10	<p>Policy D.H6 : Student housing</p> <p>Part 1</p>	<p><i>1. Proposals involving new purpose-built student accommodation should be directed to locations which are within close proximity to the borough’s higher education institutions or in highly accessible locations and must:</i></p> <ol style="list-style-type: none"> <i>a. not compromise the supply of land for self-contained homes;</i> <i>b. have an undertaking in place to provide housing for students at one or more specific education institutions, or otherwise provide an element of affordable student accommodation;</i> <i>c. respect existing residential amenity; and</i> <i>d. provide 10% of student rooms which are easily adaptable for occupation by wheelchair users. 5% of student rooms which are wheelchair accessible, including access to a wheelchair-accessible shower room for independent use.</i>

	Policy D.H6 : Student housing Between paragraphs 4.62 and 4.63	Insert a new paragraph and renumber subsequent paragraphs accordingly: <u>In order to meet the needs of students with physical disabilities, 5% of student rooms must be wheelchair accessible (capable of being independently accessed and used). To meet this requirement, rooms and bathrooms must meet the requirements outlined in figure 30 and figure 52 in the British Standard BS8300: Design of an accessible and inclusive built environment.</u>
MM11	Policy D.H7: Housing with shared facilities (houses in multiple occupation) Part 1	1. New houses in multiple occupation will be supported where they: <u>a. meet an identified need;</u> <u>b. do not result in the loss of existing larger housing suitable for family occupation;</u> <u>c. b. can be secured as a long-term addition to the supply of low cost housing, or otherwise provides an appropriate amount of affordable housing;</u> <u>d. e. are located in an area of high transport accessibility;</u> <u>e. d. do not give rise to any significant amenity impact(s) on the surrounding neighbourhood; and</u> <u>f. e. comply with relevant standards and satisfies the housing space standards outlined in policies D.H3 and D.DH8.</u>
	Policy D.H7: Housing with shared facilities (houses in multiple occupation) Paragraph 4.68	<i>The Greater London Authority (GLA) household projections suggest there is an increasing demand for HMO-style accommodation in the borough, particularly among young people. The number of 'other type' households (which includes HMOs) headed by persons aged 16-34 is projected to rise from 12,295 in 2016 to 16,555 in 2031</i> <u>NEW FOOTNOTE</u> . <i>High quality, large-scale HMOs can help meet this need. <u>This will need to be demonstrated with regards to the specific scheme and location (part a). Applications should seek to address housing need, as outlined in policies S.H1 (see paragraph 4.21) and D.H2. It is considered this is best delivered through a mixed tenure scheme which could meet a range of housing needs. In addition However,</u> reflecting the changing role of HMO-style accommodation in the borough and the acute shortage of affordable housing, it is appropriate that all forms of market housing (including HMOs) contribute towards meeting the high affordable housing need.</i> <u>NEW FOOTNOTE: Tower Hamlets Strategic Housing Market Assessment (2017)</u>
MM12	Policy D.TC2: Protecting retail in our town centres	3. Within the Secondary Frontages, development should will be expected to: <u>a. contribute to achieving a minimum of 40% ensure the proportion of ground floor units within as A1 (retail) use does not fall below 40% of the total number of units within the Secondary Frontage;</u> and <u>b) support a broad range of non-retail commercial and community uses which support the overall function of the town centre.</u>
	Policy D.TC3: Retail outside our town centres Part 1	1. Outside of the borough's <u>Major, District and Neighbourhood Centres town-centre hierarchy</u> , new retail development will be subject to: <u>a. a sequential test; and individual units do not exceed 200 square metres; and</u> <u>b. an impact assessment where individual units or extensions exceed 200 square metres gross floorspace</u>

	<p>Policy D.TC3: Retail outside our town centres</p> <p>Paragraph 6.31</p>	<p><i>New retail units or extensions outside of the town centres set out in part 1 hierarchy should not exceed 200 square metres gross floorspace to ensure that they are local in nature and do not harm the vitality and viability of existing centres (as defined on the Policies Map). Where individual retail units exceed the size limit set out in part 1, applicants will be required to submit an impact assessment in accordance with the NPPF. <u>The primary shopping areas of the Major and District Centres are illustrated on the Policies Map. For Neighbourhood Centres, their boundaries (as illustrated on the Policies Map) will equate to the primary shopping areas of these centres.</u></i></p>
	<p>Policy D.TC3: Retail outside our town centres</p> <p>After paragraph 6.31</p>	<p>Insert new paragraph and amend subsequent paragraph numbers accordingly:</p> <p><u>The Central Activities Zone and Tower Hamlets Activity Areas have a unique role in the town centre hierarchy. New retail uses may be appropriate in these areas, especially those of a smaller scale, where they would not detrimentally affect the vitality and viability of Major, District or Neighbourhood Centres. We take a judgement-based approach to proposals within these areas and a sequential test and/or impact assessment may still be required where a proposal has a potentially adverse impact on a Major, District or Neighbourhood Centre.</u></p>
<p>MM13</p>	<p>Policy S.OWS1: Creating a network of open spaces</p>	<p>1. Proposals will be required to provide or contribute to the delivery of an improved accessible, well-connected and sustainable network of open spaces through:</p> <p><i>a. protecting all existing open space to ensure that there is not net loss (except where it meets the criteria set out in policy D.OWS3);</i></p> <p><u>b. maintaining the open character of Metropolitan Open Land;</u></p> <p><i>c. b. improving the quality, value and accessibility of existing publicly accessible open space across the borough and neighbouring boroughs, in line with the Green Grid Strategy, Open Space Strategy, Local Biodiversity Action Plan and Sport England’s Active Design Guidance;</i></p> <p><i>d. c. delivering an improved network of green grid links in line with the Green Grid Strategy to enhance access to key destination points (town centres, community facilities and publicly accessible open spaces) and to and along waterspaces, as well as provide ecological corridors for wildlife; and</i></p> <p><i>e. d. maximising the opportunities to create/increase publicly accessible open space (including playing pitches and ancillary sporting facilities) with a range of sizes and for a range of users, particularly in the following locations (which are expected to experience the highest level of open space deficiency).</i></p> <ul style="list-style-type: none"> • Bethnal Green • Blackwall & Cubitt Town • Bromley North • Bromley South • Canary Wharf • Limehouse • Poplar • Shadwell • Spitalfields & Banglatown • St Dunstan’s • St Peter’s Weavers • <u>Weavers</u> • Weavers • Whitechapel <p><i>f. e. assisting with the delivery of enhanced new strategic publicly accessible open spaces at Lea River Park (including the Leaway) and within site allocations.</i></p> <p><u>2. Inappropriate development on areas designated as MOL (as shown on the Policies</u></p>

		<u>Map) will not be permitted unless very special circumstances can be demonstrated in line with the requirements set out in the National Planning Policy Framework.</u>
MM14	Policy D.OWS3: Open space and green grid networks	<p>1. Developments on areas of open space (excluding Metropolitan Open Land) will only be supported in exceptional circumstances where:</p> <ol style="list-style-type: none"> it provides essential facilities that enhance the function, use and enjoyment of the open space (e.g. ancillary sport facilities to the playing field use); or as part of a wider development proposal, both an increase of open space and a higher quality of open space can be achieved; and in any of the circumstances described in parts 21 a and 21 b, it is demonstrated that it will not result in any adverse impacts on the existing ecological, heritage or recreational value of the open space and the flood risk levels within and beyond the boundaries of the site; and it is an outdoor sport and recreational space or facility, the sporting and recreational benefits of which would outweigh the harm resulting from its loss.
MM15	Policy D.OWS4: Water spaces	<p>1 Development within or adjacent to the borough's water spaces is required to demonstrate that:</p> <ol style="list-style-type: none"> it does not result in loss or covering of the water space, unless it is a water-related or water dependent use at appropriate locations and of appropriate scale; there are no adverse impacts on the existing water spaces network, including navigation, biodiversity, water quality, visual amenity, openness and the character and heritage value of the water space, taking into consideration the adjacent land, and the amenity of existing surrounding development; <u>there are no unacceptable impacts on the openness of the water space;</u> it enhances the ecological, biodiversity and aesthetic quality of the water space, taking into account the design and landscaping of the adjacent land area, in line with the Tower Hamlets Local Biodiversity Action Plan and the European Union Water Framework Directive; it does not have an adverse impact on other existing active water uses; it will provide increased opportunities for continuous public access, use of the water space for water-related uses and sport and recreational activities; it responds positively and sensitively to the setting of water space, while respecting and animating water space to improve usability and safety; and it provides suitable setbacks from water space edges to mitigate flood risk and to allow riverside walkways, canal towpaths and cycle paths, where appropriate. Where necessary, development should contribute to the restoration of the river walls and embankments.
	Policy D.OWS4: Water spaces After paragraph 8.51	<p>Add the following paragraph and re-number the subsequent ones accordingly:</p> <p><u>The sense of openness greatly contributes to a person's perception and enjoyment of water spaces. This is of particular importance in a borough like Tower Hamlets where there is a high deficiency of open space. When assessing planning applications, consideration will be given to the water coverage and human experience of the openness of water space in terms of its visibility and visual connections across the water from the surrounding public realm.</u></p>

MM16	Policy D.ES3: Urban greening and biodiversity After paragraph 9.24	Insert new paragraph and renumber the subsequent ones accordingly: <u>Due to the environmental importance of trees, at least a ‘one-for-one’ replacement rate is required for any trees affected by a development (see part 1 above). Where we are convinced these cannot be incorporated on site, we will consider the provision of a replacement tree on a suitable site, as close to the development as possible. We will also expect developments to incorporate additional trees, wherever possible. Their location must be carefully considered to ensure there is no adverse impact on overshadowing, wind effects, air quality, ecology or flood risk. Where trees are proposed along the river corridor, their positioning must be carefully considered to ensure there are no adverse impacts on ecology or flood risk. A buffer of at least 5 metres is suggested between the bank and tree. We will take a ‘right tree for the right site’ approach which takes account of historic context, availability of space, soil conditions, wildlife value, potential improvements to air and soil quality, provision of shade and reducing the effects of and adapting to climate change. This will need to be evidenced in the ecology assessment.</u>
MM17	Policy D.ES7: A zero carbon borough Part 2 and paragraph 9.53	2. Development is required to maximise energy efficiency based on the following standards: a. All new non-residential development and non-self-contained residential accommodation over 500 square metres floorspace (gross) must meet or exceed BREEAM ‘excellent’ rating. b. All major non-residential refurbishment of existing buildings and conversions over 500 square metres floorspace (gross) must meet at least BREEAM non-domestic refurbishment ‘excellent’ rating. 9.53 In addition, developments should implement at least the minimum standards set out in BREEAM (Building Research Establishment Environmental Assessment Method) <u>which</u> applies to non-residential developments, <u>non-self-contained housing and</u> residential development arising from conversions and changes of use. This method provides a holistic assessment of the environmental sustainability of a development. The Home Quality Mark is one way of demonstrating the standard of a new residential dwelling, which includes measures for low carbon dioxide, sustainable materials, good air quality and natural daylight. We strongly encourage schemes to use the Home Quality Mark.
MM18	Policy D.ES6: Sustainable water and waste water management Paragraphs 9.47 - 9.48	9.47 In relation to part 3, major development (as defined in the glossary) is required to demonstrate that there is adequate capacity both on and off site to serve the development. It may be necessary to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure. <u>Developers should contact Thames Water as early as possible (preferably in advance of the submission of a planning application) to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements in order for Thames Water to undertake the necessary upgrades. Where there is a capacity constraint, and no improvements are programmed by the water company (Thames Water), the proposed development will be required to provide for the appropriate improvements, which must be completed prior to occupation of the development. phasing conditions may be applied to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.</u> 9.48 Developments are strongly encouraged to contact Thames Water in advance of the submission of planning applications to ensure that the water and wastewater requirements of development proposals are understood and that any upgrade requirements are identified. Renumber subsequent paragraphs accordingly

MM19	Part 4: Delivering Sustainable Places, after paragraph 1.7	Insert the following paragraph and amend the subsequent numbering accordingly: <u>When determining a planning application, flexibility may be applied to the policies relating to the site allocation requirements based on an up-to-date assessment of need and the agreed viability position of the scheme to ensure the site allocation is deliverable in the context of the principles of sustainable development.</u>
MM20	Delivering sustainable places: City Fringe sub-area development principles Paragraph 2.5	Include the following wording to the sub-area development principles, under 'improving connectivity and travel choice': <u>23: Provide the necessary and suitable bus facilities within the vicinity of the Whitechapel district centre to ensure that there is sufficient capacity to support existing and future operation of bus services in Whitechapel, including enhancements linked to the Elizabeth line.</u>
MM21	Marian Place Gas Works and The Oval site allocation (1.3)	To be inserted into the delivery considerations: <u>The gasholders do not accommodate any employment floorspace and therefore this floorspace does not need to be re-provided as part of any new scheme.</u>
MM22	Whitechapel South site allocation (1.4)	To be removed from the infrastructure requirements: <u>District heating facility</u>
	Whitechapel South site allocation (1.4)	To be inserted into the delivery considerations: <u>Developers should explore the option of delivering a district heating facility within the vicinity of the development.</u>
	Whitechapel South site allocation (1.4)	To be inserted into the delivery considerations: <u>Delivery of a health facility should be an NHS funded primary care and re provide the existing sexual health facility. The existing sexual health facility (including HIV services) will need to be re-provided on site in accordance with the prevailing sexual health facility building guidance (e.g. Health Building Note 12-01: Consulting, examination and treatment facilities. Supplement A: Sexual and reproductive health clinics) unless an alternative location can be found which meets the requirements of policy D.CF2. A continued service will need to be maintained to the satisfaction of the council's public health team.</u>
MM23	Bow Common Gas Lane site allocation (2.1)	To be inserted into the delivery considerations: <u>Development should acknowledge the associated costs of decommissioning the gasworks and the relocation of any significant equipment and address any environmental pollution and on site decontamination requirements caused by the gasworks.</u>
	Bow Common Gas Lane site allocation (2.1)	To be inserted into the delivery considerations: <u>Prior to demolition, the gasholders on the site did not accommodate any employment floorspace and therefore this floorspace does not need to be re-provided as part of any new scheme.</u>

MM24	Chrisp Street Town Centre site allocation (2.2)	Amendment to figure 30: Show Kerbey Street as a strategic pedestrian/cycling route
MM25	Leven Road Gas Works site allocation (3.2)	To be inserted into the delivery considerations: <u>Prior to demolition, the gasholders on the site did not accommodate any employment floorspace and therefore this floorspace does not need to be re-provided as part of any new scheme.</u>
MM26	Aspen Way site allocation (4.1)	To be inserted into infrastructure requirements: <ul style="list-style-type: none"> • <i>Strategic open space (minimum of 1 hectare)</i> • <i>College (re-provision)</i> • <i>Community centre and associated football pitches (re-provision)</i> • <u>Re-provision of DLR depot (Transport for London)</u> • <u>Improvement and enhancement of existing pedestrian bridge over Aspen Way and routes to it</u>
MM27	Millharbour site allocation (4.8)	To be inserted into the infrastructure requirements: <ul style="list-style-type: none"> • <i>Small open space (minimum of 0.4 hectares)</i> • <i>Primary school</i> • <i>Health facility</i> • <u>Re-provision of existing alternative provision secondary school</u>
MM28	North Quay site allocation (4.9)	To be inserted into the design principles: <i>a. accommodate a new east-to-west <u>pedestrian/cycle</u> route through the site <u>which facilitates connections to</u> <u>into the cycle</u> <u>the wider movement network</u>, and the DLR and underground stations adjoining the site. <u>and pedestrian movement to/from the DLR stations at Poplar and West India Quay and the Elizabeth line station;</u></i>
	North Quay site allocation (4.9) Figure 48	Amend boundary to more closely reflect the planning application. This will also be reflected in figures 19, 38 and 39.
MM29	Westferry Printworks site allocation (4.12) Figure 51	Amend boundary to omit the leisure centre and reflect the application boundary. This will also be reflected in figures 19, 38 and 39.
MM30	Wood Wharf site allocation (4.13) Figure 52	Amend boundary to more closely reflect the planning application, particularly in relation to the southern boundary. This will also be reflected in figures 19, 38 and 39.

MM31	Achieving sustainable growth	<p>Insert new indicator after KMI1: <u>KMI 2: Delivery of housing and key infrastructure requirements through site allocations (not including school sites)</u></p> <p>Insert new target: <u>As set out in the site allocations</u></p>
	Achieving sustainable growth	<p>Insert new indicator after KMI1: <u>KMI 3: Delivery of primary and secondary schools through site allocations.</u></p> <p>Insert new target: <u>Primary and secondary schools associated with site allocations shall be delivered at a rate which keeps pace with the levels of need identified in the most recent Planning for School Places document.</u></p>
	Creating attractive and distinctive places	<p>Add new indicator after current KMI6: <u>KMI 9: Number of tall buildings within and outside of Tall Building Zones (for the purposes of this indicator, only developments referable to the Mayor of London for being over 30 metres in height will be looked at)</u></p> <p>Add new target: <u>N/A</u></p>
	Delivering economic growth	<p>Add new indicator after current KMI17: <u>KMI 21: Proportion of affordable workspace secured on major schemes (workspace at least 10% below the indicative market rate for the relevant location).</u></p> <p>Add new target: <u>All new major commercial and mixed-use development schemes to provide at least 10% of new employment floorspace as affordable workspace.</u></p>
	Revitalising our town centres	<p>Insert new indicator after current KMI21: <u>KMI 26: Proportion of A5 uses within Major, District and Neighbourhood Centres, and the number of existing and permitted A5 uses within 200 metres walking distance of an existing or proposed school and/or a local authority owned leisure centre. Monitoring will be supplemented by an annual public health analysis of childhood obesity in Tower Hamlets.</u></p> <p>Insert new target: <u>In District and Neighbourhood Centres, not more than 5% of all town centre uses to be A5 uses.</u></p> <p><u>No new A5 uses permitted within 200 metres walking distance of an existing or proposed school and/or a local authority leisure centre</u></p>
	Supporting community facilities	<p>Add new indicator before current KMI22: <u>KMI 28: Gain/loss of A4 floorspace</u></p> <p>Add new target: <u>No further loss of A4 floorspace</u></p>
	Enhancing open spaces and water spaces	<p>Add new indicator before current KMI24: <u>KMI 31: Loss of water space</u></p> <p>Add new target: <u>No further loss of water space</u></p>
	Enhancing open spaces and water spaces	<p>Add new indicator before current KMI26: <u>KMI 32: Biological quality of the Lower Lea river</u></p> <p>Add new target:</p>

		<u>'Good' status or better</u>
	Protecting and managing our environment	Add new indicator after current KMI29: <u>KMI 38: Percentage of new developments meeting zero carbon requirement (or 45% reduction target for non-residential up to 2019)</u> Add new target: <u>100% of new developments</u>
	Protecting and managing our environment	Add new indicator after current KMI29: <u>KMI 39: Percentage of residential development meeting the Home Quality Mark</u> Add new target: <u>100% of new residential developments</u>
	Protecting and managing our environment	Add new indicator after current KMI29: <u>KMI 40: Percentage of non-residential development meeting BREEAM excellent standard</u> Add new target: <u>100% of new non-residential developments</u>
	Improving connectivity and travel choice	Add new indicator before current KMI34: <u>KMI 46: Transport modal share among residents</u> Add new target: <u>Decrease in private car modal share from baseline level (2016)</u>
	Improving connectivity and travel choice	Insert new indicator after KMI36: <u>KMI 47: Level of crowding on the Jubilee line, Elizabeth line and DLR trains within the borough.</u> Insert new target: <u>N/A - monitoring will feed into discussions on strategic transport infrastructure with Transport for London and other partners.</u>
MM32	Appendix 1: Glossary Tall buildings	Any building that is significantly taller than their surroundings <u>its local context</u> and/or have has a significant impact on the skyline. <u>Within the borough, buildings of more than 30 metres, or those which are more than twice the prevailing height of surrounding buildings (whichever is less) will be considered to be a tall building.</u>
MM33	Reuters site allocation (4.1) Figure 49	Amend site boundary to omit the data centre. This will also be reflected in figures 19, 38 and 39
MM34	Figure 7	Amend skyline of strategic importance so that it reflects the Canary Wharf Tall buildings zone only

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Supplementary/Interim Planning Guidance Review

Introduction

- 1.1 The Council's spatial planning framework consists of a series of planning policy documents that provide a positive approach to managing development in the assessment of planning applications and in the setting of infrastructure requirements.
- 1.2 The Development Plan for Tower Hamlets is currently made up of the London Plan, the adopted Local Plan (Core Strategy (2010) and Managing Development Document (2013)) and Neighbourhood Plans (none adopted).
- 1.3 The Council has a series of supplementary and interim planning guidance documents which support the adopted Local Plan. The guidance provides additional detail for the implementation of Council's planning policies.
- 1.4 In light of the new Local Plan, a review of all adopted supplementary and interim planning guidance has been undertaken. The review determines which adopted supplementary and interim planning guidance should be taken forward once the new Local Plan has been adopted by Full Council. The review is necessary to ensure that the Council has a robust and up-to-date planning policy framework to sustainably manage growth and maximise the benefits of development for our local community.

The Review

- 1.5 The adopted Local Plan (Core Strategy (2010) and Managing Development Document (2013)), is currently supported by:

Adopted Supplementary Planning Documents (SPDs),

- a. [Development Viability SPD \(2017\)](#)
- b. [Planning obligations \(2016\)](#)
- c. [South Quay Masterplan \(2015\)](#)
- d. [Whitechapel Vision \(2013\)](#)
- e. [Bromley-by-Bow Masterplan \(2012\)](#)

Interim planning guidance (prepared under the previous planning framework and carried forward),

- f. [Bishopsgate goods yard \(2009\)](#)
- g. [Aldgate masterplan \(2007\)](#)
- h. [Former Whitechapel masterplan \(2007\)](#)
- i. [Wood Wharf masterplan \(2003\)](#)
- j. [Millennium Quarter Public Realm Guidance Manual \(2008\)](#)

- 1.6 Officers have reviewed all supplementary and interim planning guidance to determine whether they still provide robust and effective guidance to support the new Local Plan. The full review is detailed in appendix A which sets out officer recommendations.
- 1.7 Given the significant changes to national and regional planning policy, the borough's growth projections and the aims of the new Local Plan, officers have recommended the following documents to be formally revoked.
- Bromley-by-Bow Masterplan (2012)
 - South Quay Masterplan (2015)
 - Whitechapel Vision Masterplan (2013)
 - Wood Wharf Masterplan (2003)
 - Former Whitechapel Masterplan (2007)
 - Aldgate Masterplan (2007)
 - Bishopsgate Goods Yard (2009)
 - Millennium Quarter Public Realm Guidance Manual (2008)
- 1.8 The recommendation will be presented to full Council alongside the adoption of the new Local Plan.

Appendix A: Supplementary and Interim Planning Guidance

Document	Adoption Date	Status	Comments	Recommendations
Bromley-by-Bow Masterplan	2012	Supplementary Planning Document	<p>This document is obsolete.</p> <p>The majority of the masterplan area falls within the LLDC planning authority which is superseded by their Local Plan and supplementary planning guidance for the area.</p> <p>The remaining part of the masterplan area is captured in the new Local Plan Sub Area – Lower Lea Valley which sets out a number of development principles.</p>	Revoke LBTH's part of the masterplan area and remove from the website
South Quay masterplan	2015	Supplementary Planning Document	<p>This document is superseded.</p> <p>The design principles in the document have informed several site allocations in the new Local Plan and therefore are reflected in the new Local Plan where relevant.</p> <p>Additionally, the Greater London Authority (GLA) has prepared Supplementary Planning Guidance (SPG) for the Isle of Dogs South Poplar area which comprises the South Quay area. The SPG was prepared in consultation with the Council.</p>	Revoke as an SPD but retain as evidence base for the Local Plan site allocations.
Whitechapel Vision masterplan	2013	Supplementary Planning Document	<p>This document is superseded.</p> <p>The design principles in the document informed the Whitechapel South site allocations in the new Local Plan and therefore are reflected in the new Local Plan where relevant.</p> <p>The remaining part of the masterplan area is captured in the new Local Plan Sub Area – City Fringe which sets out a</p>	Revoke as an SPD but retain as evidence base for the Local Plan site allocation.

			<p>number of development principles.</p> <p>The height principles in the document have been superseded by the new Local Plan which consist a new tall buildings policy D.DH6 to manage taller buildings in the borough. Further guidance will also be set out in the emerging Tall Buildings SPD.</p>	
Planning obligations	2016	Supplementary planning document	<p>This document is undergoing a review.</p> <p>The new Local Plan has a number of new obligations which will benefit from further guidance. The Infrastructure Planning Team is currently updating the SPD and will include new/revised obligations.</p>	Retain and update
Development Viability	2017	Supplementary planning document	<p>This document is up to date.</p> <p>Provides guidance as to how Development Plan policies should be applied in a development viability context when determining planning applications.</p>	Retain
Wood Wharf masterplan	2003	Interim planning guidance	<p>This document is obsolete.</p> <p>Up to date guidance is set out in the Wood Wharf site allocation in the new Local Plan.</p> <p>The site is also currently under construction.</p>	Revoke and remove from the website
Former Whitechapel masterplan	2007	Interim planning guidance	<p>This document is obsolete.</p> <p>This document was not formally revoked when the Whitechapel Vision masterplan was adopted in 2013.</p> <p>The masterplan area is captured in the new Local Plan Sub Area – City Fringe which</p>	Revoke and remove from the website

			sets out a number of development principles.	
Aldgate masterplan	2007	Interim planning guidance	<p>This document is obsolete. Many of the sites in the area have been developed.</p> <p>The masterplan area is captured in the new Local Plan Sub Area – City Fringe which sets out a number of development principles.</p>	Revoke and remove from the website
Bishopsgate goods yard	2009	Interim planning guidance	<p>This document is obsolete. Up to date guidance is set out in the Bishopsgate Goods Yard site allocation in the new Local Plan and therefore principles are reflected in the new Local Plan where relevant.</p> <p>The site straddles LB Hackney boundary. LBH have consulted on an Area Action Plan which includes this site. LBH is working closely with LBTH to align both plans.</p>	Revoke and remove from the website
Millennium Quarter Public Realm Guidance Manual	2008	Guidance	<p>This document is obsolete. This guidance manual was prepared to inform The Millennium Quarter Masterplan which was revoked upon the adoption of the South Quay Masterplan.</p>	Revoke and remove from the website

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Appendix 4

- The Submission version of the Local Plan (Regulation 19 version) can be downloaded from [here](#).

https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/Appendix_1_Tower_Hamlets_Local_Plan_2031_Regulation_19.pdf

- All relevant Examination Documents (including different versions of the Local Plan as it developed through the different stages) can be found [here](#) in the Examination Library

https://www.towerhamlets.gov.uk/ignl/planning_and_building_control/planning_policy_guidance/Local_plan/Local_Plan_2031_Examination_Library.aspx

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<p>Cabinet</p> <p>27 November 2019</p>	
<p>Report of: Ann Sutcliffe, Corporate Director of Place</p>	<p>Classification: Unrestricted</p>
<p>Adoption of a new Tower Hamlets Community Infrastructure Levy (CIL) Charging Schedule</p>	

Lead Member	Councillor Cllr Rachel Blake, Cabinet Member for Planning, Air Quality and Tackling Poverty
Originating Officer(s)	Matthew Pullen, Infrastructure Planning Manager Joshim Uddin, Development Viability Team Leader
Wards affected	All wards
Key Decision?	Yes
Decision Notice Published	15 October 2019
Reason for Key Decision	The new CIL rate will generate additional funding to deliver much-needed infrastructure to support developments within the Borough.
Strategic Plan Priority / Outcome	A great place to live

Executive Summary

The Community Infrastructure Levy (CIL) is a pound per square metre charge on most types of new development, charged to pay for supporting infrastructure. The rates currently chargeable in Tower Hamlets (which exclude the area of the borough within the London Legacy Development Corporation area which is subject to a separate charge) are set out in a Charging Schedule that was adopted by the Council in April 2015.

This item recommends the adoption of a new schedule subsequent to three separate public consultations and examination in public. The newly proposed Charging Schedule seeks to increase the rates the Council currently charges.

Recommendations:

The Mayor in Cabinet is recommended to:

1. Allow all relevant reporting and associated actions to take place for the full Council to formally adopt the new CIL Charging Schedule in accordance with The Community Infrastructure Levy Regulations 2010, Regulation 25.
2. Note that there have been some minor amendments made subsequent to the examination in public (in respect of student housing and some minor

errors in the funding gap report). These amendments are not substantial or affect the need for a Charging Schedule.

1 REASONS FOR THE DECISIONS

- 1.1 The reason for the decision is to allow the Council to adopt the proposed CIL Charging Schedule to maximise the funding to deliver much needed supporting infrastructure.
- 1.2 The report from the examiner following examination in public examination confirm that the proposed rate satisfies the requirements of Section 212 of the Planning 2008 Act and meets the criteria for viability in the 2010 Regulations (as amended). Therefore, the examiner recommended that the proposed Charging Schedule be approved.

2 ALTERNATIVE OPTIONS

- 2.1 One alternative option would be to not seek to renew the Council's CIL Charging Schedule. This is not considered appropriate because it would not be a reasonable response to the consultation. The review was carried out because the Council has an infrastructure funding gap and as the Independent Examiner has approved the reasons for the review the option of not approving the new charge would have to be exceptional.

3 DETAILS OF THE REPORT

Background

What is CIL?

- 3.1 CIL is a pounds per square metre charge on most new development and must be used to help deliver infrastructure to support the development of the area. It can be used to provide new infrastructure, increase the capacity of existing infrastructure or to repair failing existing infrastructure, if that is necessary to support development. Please note that the Council currently collects the Mayor of London's CIL as well as local CIL – this document only pertains to the local CIL Charging Schedule.
- 3.2 CIL is payable on the commencement of relevant planning permissions. It generally takes many months for any development to go from permission to commencement and it can take up to three years for larger developments to commence.
- 3.3 CIL is charged on most types of development and the CIL Regulations are highly prescriptive on the way CIL is calculated and applied to development; unlike with Section 106 Planning Obligations there is no negotiation. However, developers may apply for relief from the CIL payment for affordable

housing dwellings or for developments by charity and, if permitted by the local authority, exceptional circumstances although the Council has never approved an application on this basis.

- 3.4 Seeking CIL contributions and Section 106 Planning Obligations to pay for the same type of infrastructure is generally prohibited (the only exception to this relates to financial contributions from development for Crossrail). The Council has a Regulation 123 List (within Appendix F) which identifies the types of projects on which the Council intends to spend its CIL.

How can a Charging Authority spend CIL?

- 3.5 It is the authority of the Executive to decide how to spend CIL. All expenditure decisions of the Council are the function of the Council's Executive unless regulatory functions require otherwise. There are no regulatory restrictions on CIL in terms of who decides how these funding sources are spent. CIL was provided for in the Planning Act 2008. It is a financial charge that local authorities can levy on developments to help fund infrastructure such as schools, health, open space and transport facilities to support growth in an authority's area. Please note that the proposals described in this document do not relate to how the Council will spend current or future CIL income.

How are CIL rates set?

- 3.6 A requirement of CIL rate setting is the need to demonstrate that the Council needs, in financial terms, to charge a CIL to deliver infrastructure to support development. Therefore, the Council must identify a funding gap in delivering infrastructure to support development. This information is set out in the Council's Supporting Evidence and Funding Gap report (October 2019).
- 3.7 CIL rates are based on what development across the borough can viably afford. The Council commissioned BNP Paribas Real Estate to undertake a Viability Study to establish the rates that can apply in Tower Hamlets' Charging Authority Area. It should be noted that rates cannot be set to reflect the Council's entire funding gap as CIL must be based on what development can viably afford. CIL is only one funding stream that should be utilised to fund infrastructure.
- 3.8 The Viability Study undertakes testing on generic development types across the borough as well as a number of selected "Strategic Sites" which are made up of a selection of the Council's site allocations in the Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (submission version). The Viability Study takes account of all of the policy costs attached to the new Local Plan.

What is the process for adopting a new CIL Charging Schedule?

- 3.9 In order to implement a new Charging Schedule for Tower Hamlets, the CIL

Regulations 2010 (as amended) require that a Charging Schedule setting out CIL rates must be the subject of at least two stages of consultation – three consultations were held in total.

- 3.10 Guidance states that Charging Authorities should make these consultations at least 6 weeks long. Before the Charging Schedule can be adopted it must then be approved at a public examination and then adopted in a Full Council meeting.

A national review of the CIL process

- 3.11 In September 2019 the Government updated the guidance on CIL which includes the process of implementing new schedules.
- 3.12 The changes have removed the restriction on pooling more than 5 planning obligations towards a single piece of infrastructure, alongside the removal of the Regulation 123 List and its replacement with the annual Infrastructure Funding Statement.
- 3.13 The updated regulations relax the requirements for local authorities to consult on CIL charging schedules before adoption. Charging authorities will now be required to conduct one round of consultation, rather than the two rounds previously required.
- 3.14 However, the outcomes of the new regulations and the extent to which they apply do not impact the Councils actions in adopting a new Charging Schedule. Officers do not consider it necessary to delay or postpone adoption as there are no material impacts impeding its ability to be approved.

Proposals

Proposed rates

- 3.15 The following table identifies the Council’s current CIL rates (in brackets) alongside the rates proposed (bold, red) in the new Charging Schedule:

Development type	Proposed CIL rate per sq. m (GIA) of development			
Residential (Sale)	Zone 1	Zone 2	Zone 3	Large Allocated Sites*
	(£200) £280	(£65) £150	(£35) £50	(Nil) N/A
Offices	City Fringe	North Docklands	Large Allocated Sites	Rest of Borough
	(£90) £100	(Nil) £100	(Nil) N/A	(Nil) N/A

Retail (Except Convenience Supermarkets/ Superstores and Retail Warehousing)	(£70) £100	(£70) £100	(Nil) N/A	(Nil) N/A
Convenience Supermarkets/ Superstores and Retail Warehousing	Borough Wide, except Large Allocated Sites			Large Allocated Sites*
	(£120) £130			(Nil) N/A
Hotel	Borough Wide, except Large Allocated Sites			Large Allocated Sites*
	(£180) £190			(Nil) N/A
Student Housing Let at Market Rents	Borough Wide, except Large Allocated Sites			Large Allocated Sites*
	(£425) £450			(Nil) N/A
Student Housing Let at Below Market Rents	Borough Wide, except Large Allocated Sites			Large Allocated Sites*
	(Nil) Nil			(Nil) N/A
All Other Uses	Borough Wide			
	(Nil) Nil			

* Note that the Council's current Charging Schedule has a nil rate for four sites (Wood Wharf, Westferry Printworks, Bishopsgate Goods Yard and London Dock) that were rated as such by the Examiner of the Council's current Charging Schedule. The newly proposed Charging Schedule will not have any nil rated sites, every site including those previously nil rated will now be subject to CIL.

3.16 The Council's Charging Schedule attached at Appendix B describes the rates proposed.

3.17 Whilst CIL income is very difficult to project, it is estimated that a new Charging Schedule could raise up to an additional £29m above the currently adopted CIL Charging Schedule for the Council up to the end of the year 2030/31.

4 EQUALITIES IMPLICATIONS

4.1 An Equality Assurance Checklist was completed (October 2017) and referred to the Mayor in Cabinet in respect of the approval to consult before proceeding to examination and adoption of the new schedule. This Equality Assurance Checklist (which is attached at Appendix H) found that the proposal:

Does not appear to have any adverse effects on people who share Protected Characteristics and no further actions are recommended at this stage.

- 4.2 Because the proposals have not changed in any way that would have any equalities implications, it has not been considered necessary to carry out another Equality Assurance Checklist.

5 OTHER STATUTORY IMPLICATIONS

- 5.1 This section of the report is used to highlight further specific statutory implications that are either not covered in the main body of the report or are required to be highlighted to ensure decision makers give them proper consideration. Examples of other implications may be:

- Best Value Implications,
- Consultations,
- Environmental (including air quality),
- Risk Management,
- Crime Reduction,
- Safeguarding.

- 5.2 The consultation(s) have been carried out in accordance of the requirements of the Community Infrastructure Levy Regulations 2010 (as amended) and the Council's Statement of Community involvement.

- 5.3 The proposal has limited impact on best value implications and no safeguarding implications arise from the proposals.

- 5.4 In terms of risk management the proposals set out in this report seek to maximise the Council's income through CIL. Maximising CIL income will help mitigate against the risk of the Council being unable to provide enough infrastructure to support development.

- 5.5 In terms of crime reduction implications proposals set out in this report seek to maximise the Council's income through CIL. This will help the Council deliver infrastructure that might assist with the Council's crime and disorder objectives.

- 5.6 In terms of environmental implications, the infrastructure delivered using the Council's CIL can help the Council meet its sustainability and environmental objectives.

6 COMMENTS OF THE CHIEF FINANCE OFFICER

- 6.1 The proposed rates in the new charging schedule would increase those currently charged. Additionally there are a number of sites that are currently

not subject to a CIL charge, which under the proposals would be. The current and proposed rates are set out in paragraph 3.15 and Appendix B.

- 6.2 Based on current development assumptions it is estimated that the proposed changes to the charging schedule could generate up to an additional £29m in the period 2020/21 to 2030/31. The total potential CIL income for the same period could be in the region of £224m.
- 6.3 The use of CIL income to fund specific infrastructure schemes would be considered as part of the Council's capital governance arrangements.
- 6.4 In addition to the Tower Hamlets CIL, the Council is responsible for collecting Mayoral CIL payments on behalf of the London Mayor. The Mayoral CIL is independent of the Council's CIL requirement.

7 COMMENTS OF LEGAL SERVICES

- 7.1 This item seeks approval to approve a new CIL charging schedule following three separate public consultations and recommendations from an Inspector after Examination in Public. The proposed Charging Schedule would increase the rates the Council currently charges.
 - 7.2 The decision making framing for this decision is to be found in Part 11 of the Planning Act 2008 and the Community Infrastructure Levy Regulations 2010 as amended ("The Regulations"). The Act allows for the imposition of a charge known as the Community Infrastructure Levy ("CIL") by a Charging Authority. The Council is a Charging Authority for these purposes. The Regulations provides a prescriptive staged process involving rounds of publication and consultation all of which the report indicates have been carried out. Legal Services has advised throughout those stages. Section 212 of the Act provides that a charging authority may approve a charging schedule only (a)if the examiner makes recommendations under section 212A(4) or (5), and (b)the charging authority has had regard to those recommendations and the examiner's reasons for them. This report indicates that the Independent Examiner has recommended approval.
 - 7.3 Attention is also drawn to section 13 and 14 of the Planning Act 2008 which provides that the Charging Authority in setting a charge must strike an appropriate balance between revenue maximisation on the one hand and the potentially adverse impact upon the viability of development on the other. The regulations also state that local authorities should take account of other sources of available funding for infrastructure when setting CIL rates.
 - 7.4 Adopting the Charging Schedule is a non-executive function of the Full Council. Section 213 of the Planning Act further provides that a charging authority must approve a charging schedule (a) at a meeting of the authority, and (b)by a majority of votes of members present.
-

Appendices

- A. Examiners Report
- B. Charging Schedule (final)
- C. Statement of Modifications
- D. Equalities Impact Analysis
- E. Charging Schedule explanatory notes
- F. Regulation 123 list
- G. Instalment policy
- H. Supporting Evidence and Funding Gap Report

Officer contact details for documents:

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Report to the London Borough of Tower Hamlets

by Terrence Kemmann-Lane JP DipTP FRTPI MCMI
an Examiner appointed by the Council

Date: 4 October 2019

PLANNING ACT 2008 (AS AMENDED)
SECTION 212(2)

REPORT ON THE EXAMINATION OF THE LONDON BOROUGH OF TOWER HAMLETS COMMUNITY INFRASTRUCTURE LEVY DRAFT CHARGING SCHEDULE

Charging Schedule submitted for examination on 24 May 2019

Date of Hearing: 1 August 2019

Non Technical Summary

This report concludes that the Revised London Borough of Tower Hamlets Council Community Infrastructure Levy Draft Charging Schedule, submitted and consulted on during the course of this examination, provides an appropriate basis for the collection of the levy in the borough. The proposed rates will not put developments at risk, and it can be recommended for approval.

Introduction

1. This report contains my assessment of the London Borough of Tower Hamlets Council (LBH) Community Infrastructure Levy (CIL) Revised Draft Charging Schedule (DCS) in terms of Section 212 of the Planning Act 2008. It considers whether the schedule is compliant in legal terms and whether it is economically viable as well as reasonable, realistic and consistent with national guidance (Ministry of Housing, Communities and Local Government Guidance on the Community Infrastructure Levy).
2. To comply with the relevant legislation the local charging authority has to submit a charging schedule that sets an appropriate balance between helping to fund necessary new infrastructure and the potential effects on the economic viability of development across the borough.
3. The Council published the DCS, in accordance with Regulation 16 of the CIL Regulations 2010 (as amended), for consultation between 22 November 2018 and 17 January 2019. Following this, the Council has corrected a small error. This related to retail developments in Zone 3 and the Schedule now shows the corrected rate, which is Nil.
4. Following an appeal decision on 2 East Ferry Road, resulting in potential development coming forward which otherwise would have remained within a conservation area, the Council identified a boundary that it considered was appropriate to amend. This was a small amendment to the boundary between CIL Zones 1 and 2 in the vicinity of the appeal address just mentioned. The result of the appeal was that the demolition of unlisted buildings was allowed, and this meant the site being available for development. A supplementary consultation took place between 14 March and 25 April 2019. The Council received responses from six representors but none related to the proposed change.
5. The submitted DCS, as modified by the insertion of the Nil rate for retail developments in Zone 3 and the amended boundary between Zones 1 and 2 in the vicinity of 2 East Ferry Road, was the subject of discussion at the hearing held on 1 August 2019 and of this report.
6. The submitted DCS is a revision of the schedule that has been in force since the 1 April 2015. The charging rates set out at that time will have increased by virtue of the provision in the Regulations for increases in rates to follow changes in the inflation rate in keeping with the "All-in Tender Price Index" published by the Building Cost Information Service (BCIS). From my understanding of the current charging levels, with the inflation additions at November 2018 (the November of the previous year is used for the calculation) the increase above the inflated rates for some development

types is quite modest, whilst for offices in Zone 1 and convenience retail, hotel, and market rent student housing Borough-wide, the proposed rates are lower. The biggest changes proposed are in respect of the 'Large Allocated Sites'¹ (in respect of all development types that have a charge), and office development in North Docklands.

7. For convenience, I set out below the CIL rates now proposed by the Council.

Development Type	Proposed CIL rate per m ² (GIA) of development		
Residential	Zone 1	Zone 2	Zone 3
	£280	£150	£50
Offices	City Fringe and North Docklands		Rest of Borough
	£100		NIL
Retail (Except Convenience Supermarkets/ Superstores and Retail Warehousing)	£100	Nil	Nil
Convenience Supermarkets/ Superstores* and Retail Warehousing** Borough Wide	Borough Wide		
	£130		
² Hotel	£190		
Student Housing Let at Market Rents***	£450		
Student Housing Let at Below Market Rents****	Nil		
All Other Uses	Nil		

* Convenience Supermarkets/Superstores are defined as shopping destinations in their own right, where weekly food needs are met, catering for a significant proportion of car-borne customers, and which can also include non-food floorspace as part of the overall mix of the unit.

** Retail Warehousing is defined as shopping destinations specialising in the sale of household goods (such as carpets, furniture and electrical goods), DIY items and other ranges of goods, catering for a significant proportion of car-borne customers.

*** Student housing not falling with the definition at **** below.

**** Student housing, provided in the form of affordable student housing as defined by the Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (Regulation 19 version), secured by a s106 planning obligation.

¹ Large Allocated Sites are defined as the sites, within Tower Hamlets, contained within the boundaries of the Bishopsgate Goods Yard, Wood Wharf, Westferry Printworks and London Dock allocated sites as set out in the Tower Hamlets Local Plan Managing Development Document.

Is the charging schedule supported by background documents containing appropriate available evidence?

Does the Infrastructure Delivery Plan support the introduction of CIL?

8. The Council's Infrastructure Delivery Plan (IDP), document CIL AD 06, was published in October 2017. The IDP identifies a range of projects required to support the development of the Council's area, as described in the Local Plan and the London Plan. Behind the production of the IDP is the Council's decision-making process called the Infrastructure Delivery Framework, which is supported by an evidence base to ensure decision-making is well informed. This process was referred to and approved by the Mayor in Cabinet.
9. The evidence base for the IDP was produced in consultation with Council Service Areas and other infrastructure providers. It involved the reviewing and summarising of existing plans, policies and strategies as well as setting out the projects that will help the Council deliver these. The evidence base is an evolving document, updated in terms of project content every six months with a more comprehensive review taking place annually. It is a very substantial document with 18 chapters, each dealing with a specific infrastructure asset class, such as the various levels of education, health, leisure/sports, transportation, employment, youth facilities, strategic flood defences, and waste management.
10. Of course there are matters for which the Council will continue to secure section 106 contributions, and these are set out in some detail in the adopted Planning Obligations Supplementary Planning Document. Affordable housing will continue to be secured through s106, as well as such things as skills and training contributions, carbon offset contributions and site-by-site matters where there would not be conflict with the Regulation 123 list.
11. As further background evidence, I have also been provided with a summary of the amounts that the Council has collected in recent years through s106 and CIL. Between 2015/16 (the first year of CIL collection in the Borough) and 2017/18, a total of £39,115,651 was collected, whilst through s106, between 2014/15 and 2017/18 a total of £76,176,924 was collected. As further background I am informed that the extent to which the Council's affordable housing target has been met is as follows:

	2012/13	2013/14	2014/15	2015/16	2016/17
No. of affordable units delivered	262	691	730	822	1,008
% of affordable housing delivered by habitable room	34%	34%	35.6%	41%	23.6%

12. Detailed information on the Council's Funding Gap is set out in chapter 2 of the IDP. Taking all 18 specific infrastructure asset classes referred to in

paragraph 9 above, the total combined cost of projects is £1,900,804,433. However, it should be noted that 1 item 'Transportation, Connectivity and Public Realm Infrastructure totals £1,319,140,000, but this includes an upgrade to the entire DLR network, costing approximately £700m. At present this cannot be disaggregated to establish what only applies in this authority's area: in any event it is assumed that this will be funded entirely from TfL's Business Plan, and so does not affect the Funding Gap.

13. The Council's 'reasonable expectation' of funding sources is £792.68m from capital grants, £183.5m from s106 (existing account and projections up to 2028/29), and CIL funding of 292.75m (existing and projections up to 2030/31). These figures total £1,268m. The details of these figures and how they were derived can be found in the document 'Supporting Evidence and Funding Gap Report' (document CIL SD 04).
14. Taking the figures from document CIL SD 04, the residual funding gap can be determined. The total cost of infrastructure at £1,900,804,433, less funding from sources other than CIL of £1,015,368,055, provides an aggregate funding gap of £885,436,378. Deleting the amount of the projected CIL funding up to 2030/31 provides a residual funding gap of £592,682,953. Thus a significant residual funding gap is demonstrated. CIL will play a modest part in helping to fund infrastructure in the borough, but the vast majority of funding will need to come from sources other than CIL. I am satisfied that the IDP reflects the infrastructure requirements for the Borough and that the continuing need to charge a borough CIL is demonstrated.

Does the economic viability evidence support the introduction of CIL?

15. The Council commissioned a report, called the Community Infrastructure Levy Review (the ILR), from a consultancy specialising in development viability studies. The latest version of this is dated March 2019 superseding the August 2018 Report, taking into account a boundary change to the residential CIL Zones (see paragraph 4 above). This report reviews the CIL rates in the London Borough of Tower Hamlets Charging Schedule that was adopted on 25 February 2015 and implemented on 1 April 2015. Levels of CIL have been tested in combination with the cumulative impact of the requirements of the emerging Tower Hamlets Local Plan 2031.
16. The ILR uses a residual valuation method of calculating the value of each development. This involves calculating the value of the completed scheme and deducting development costs (construction, fees, finance, sustainability requirements, CIL and other plan policy costs) and developer's profit. The residual amount is the sum left after these costs have been deducted from the value of the development and guides the amount available for site acquisition. A 'Benchmark Land Value' (BLV) is used, being the value above the existing use value a reasonable landowner would accept including a premium as an incentive to sell, to bring the site to market for development. This is a standard approach advocated by the Planning Practice Guidance and the Harman Report.
17. The ILR begins with an appraisal of the economic and housing market context at national and local market levels with a commentary on consumer confidence and house price movements from the downward adjustment in

2008/9 through to the effect of the 2016 referendum and the impact on the Pound Sterling. Bank of England reports, International Monetary Fund forecasts, inflation rates and the effects of stamp duty changes and changes to tax on the purchase of second properties are reported. The analysis of various institutions commentaries and forecasts for the housing market are noted.

18. The section on the national context concludes by reporting that forecasts for house price growth identify that values are expected to increase over the next five years, but this price growth is expected to be more moderate than over the past 20 years. There is a consensus that a low level of price growth is expected until a return to stronger sales value growth in 2020 - 2022, when it is anticipated that there will be more certainty on the deal agreed for the UK's exit from the EU, and employment growth, wage growth and GDP growth return towards trend levels.
19. The ILR notes that, at the local level, according to Land Registry data, as of August 2009, values had fallen in Tower Hamlets by circa 25% from the April 2008 market peak. Subsequently values recovered steadily to April 2010, from which point values fluctuated within a 7% range until May 2013. From May 2013 average values have been seen to increase at a more rapid rate exceeding the April 2008 peak of the market value in October 2013. As of June 2018 residential sales values in Tower Hamlets were circa 140% higher than the April 2008 peak. Tower Hamlets has seen very strong growth in sales values across the borough, where values have been seen to almost double since the preparation of the Council's previous CIL viability evidence. Growth in values has resulted from a significant number of development schemes coming forward, regenerating the borough. Values in the city fringe, along the Thames, and in the Canary Wharf area have seen significant increases. These areas are now considered part of the central London 'prime market'. Growth in values in these areas has resulted in part from active interest from both domestic and overseas investors.
20. For residential development, the ILR appraised 9 development typologies, reflecting both the range of sales values/capital values and also sizes/types of development and densities of development across the borough. The Council reviewed historic planning applications and have based the appraisal typologies on a range of actual developments within the borough. These typologies are therefore reflective of developments that have been consented/delivered as well as those expected to come forward in Tower Hamlets in future.
21. For commercial development, a series of commercial development typologies were appraised, reflecting a range of use classes at average rent levels achieved on lettings of commercial space in actual developments. In each case, the assessment assumes an intensification of the site, based on three current commercial uses of the site, providing a range of current use values. The existing use value assumes that the existing building is 30%-50% of the size of the new development, with a lower rent and higher yield reflecting the secondary nature of the building.
22. The benchmark land values (BLV) were based on the existing use value or alternative use value of sites and are key considerations in the assessment of development economics for testing planning policies and tariffs. Existing

use value or alternative use value are effectively the 'bottom line' in a financial sense and therefore a key factor in the study.

23. The 4 BLVs used in the study were selected to provide a broad indication of likely land values across the Borough. It is necessary to recognise that a landowner will require an additional incentive to release the site for development. The premium above current use value is reflective of specific site circumstances (the primary factors being the occupancy level and strength of demand from alternative occupiers). For policy testing purposes it is not possible to reflect the circumstances of each individual site, so a blanket assumption of a 20% premium was been adopted to reflect the 'average' situation.
24. The inputs in the Review, such as build costs, professional fees, development finance, marketing costs, development and sales period and developer's profit all follow well trodden ground in viability appraisals. With regard to build costs, the Council commissioned a specialist consultancy to give advice. This firm provided advice on base build costs as well as the adjustments to the base costs necessary to reflect the Council's emerging policy requirements which are not already included in the base build costs. In addition to the build costs adopted in the study, the appraisals include a contingency of 5% of costs.
25. The ILR also includes allowance for Mayor of London CIL (MCIL2) at the rate of £60 per square metre (psm). A portion of the borough is located in the MCIL Central London Charging Area and the majority of the Isle of Dogs is within the Isle of Dogs MCIL2 Charging Area. Both locations have charges for offices, retail and hotels at £185, £165, and £140 psm respectively³.
26. The ILR has taken into account the emerging policies and standards set out in the Tower Hamlets Local Plan 2031. These include inter alia affordable housing requirements and sustainability and developer contributions towards infrastructure. There are numerous policy requirements that are now embedded in base build costs for schemes (i.e. secure by design, landscaping, amenity space, internal space standards etc.). The ILR paragraph 2.48 sets out a summary of the policies identified as having cost implications for developments. Additionally an allowance has been made for residual section 106 costs for both residential development (see paragraph 4.25) and commercial (see paragraph 4.50). Following these allowances, a 25% 'buffer' has been allowed in all the CIL rates that the Review recommends.
27. The ILR follows the usual approach used in the high level appraisals of viability produced for the preparation and examination of CIL charging schedules. It appears a thorough and comprehensive study, of the sort that has been relied upon in many CIL examinations.

³ See the ILR paragraphs 4.26 and 4.51.

Conclusion

28. The DCS is supported by evidence of community infrastructure needs and a funding gap has been identified. I am satisfied that the Community Infrastructure Levy Review follows good and accepted practice. Furthermore, there is evidence for the various inputs used and adequate headroom – a minimum 'buffer' of 25% is allowed for. I conclude that the DCS is supported by satisfactory viability evidence and evidence of the costs of infrastructure and that the background documents contain appropriate available evidence. The viability evidence in particular is proportionate, appropriate, and robust.

Are the charging rates informed by and consistent with the evidence?

Is the level of CIL proposed for residential development justified?

29. At paragraph 28 above I conclude that the DCS is supported by viability evidence that is proportionate, appropriate, and robust. However among the responses to the consultation on the DCS there were a number of issues raised that relate to the detail of inputs and conclusions reached in the ILR that I need to deal with.
30. Since this examination is into a revised DCS, some 5 years after the previous examiner's report, it is perhaps not surprising that the range of issues raised is not that great. My predecessor dealt fully and robustly with the matters brought before him, and perhaps some of the concerns raised have proved not so concerning, or perhaps have simply been accepted as all part of the complex challenges that the development industry deals with. In fact, apart from representations about 'strategic sites', there has been little effective opposition to the Council's proposals.
31. The major outcome of the previous examination was the recommendation that 4 large sites that are allocated for development should be nil rated. These were the Bishopsgate Goods Yard, Wood Wharf, Westferry Printworks, and London Dock. Since the current DCS now proposes to bring these 4 sites into the charging rates of the Zones within which they stand, it would be surprising if this proposed change were not controversial. I will set out the broad thrust of the representations, before dealing with detailed issues.
32. The major issue raised is in respect of strategic sites identified in the Local Plan. Concern is expressed that the conclusions of the Examiner of the initial DCS have been ignored in the ILR, and the conclusions drawn from it, in taking the 4 large strategic sites out of the nil charge zone. There needs to be appropriate available evidence to support this change only 4 years after the adoption of the current schedule. The selection of allocated sites is also questioned; in particular why those significant site allocations at Wood Wharf, Westferry Printworks and London Dock have not been analysed?
33. As background, the previous Examiner in his 2014 report, in respect of residential development, found that the viability study and the Council's approach to assume that 10+ unit developments would deliver 35% affordable housing was a satisfactory assumption that would enable most residential development (other than on large allocated site – which he

considered separately) to provide both this level of affordable housing and a worthwhile contribution to other infrastructure. He also found that the rates for office, retail, hotel and student housing developments (other than on large allocated sites) were informed by and consistent with the evidence.

34. In respect of the large allocated sites, he was concerned about current or worsening economic circumstances and the poor return in those circumstances. He noted that the evidence demonstrated that the 4 appraised large allocated sites would only be likely to achieve an internal rate of return (IRR) of 20% (which he considered would be needed in the event of economic growth likely to be necessary for a scheme to come forward) if the affordable housing requirement were to be "flexed" below the 35%, and he was not persuaded that it would be appropriate to flex affordable housing without limitation. As a result he concluded that the CIL rates proposed were not consistent with the evidence insofar as they would apply to the Bishopsgate Goods Yard, Wood Wharf, Westferry Printworks and the London Dock allocated sites, and recommended a nil rate for all development on these sites.
35. The Council's position now is that it is firmly of the opinion that the 4 large sites should not have been nil rated in the current schedule, and that the ILR demonstrates that they are able to bear the rates now proposed. It points out that Westferry Printworks has planning permission and development has commenced. The proposed CIL, including MCIL2, would amount to less than 5% of development costs. It also states that the economic circumstances of development have changed significantly since 2014, and that its current robust viability testing should be the basis on which to judge the DCS.
36. Furthermore, the Council considers that its decision to accept land and/or physical infrastructure in lieu of monetary CIL (see document CIL SD 01.3) is an important component of its justification for the proposed rates. Section 2 of the document 'Additional Evidence and Information Document' (CIL SD 01.4) sets out its position. In brief, it makes reference to the relevant CIL Regulations and CIL Planning Practice Guidance; the way the payment is established and the formal agreement that is entered into. It refers to an existing agreement that has been made and to another that is at an advanced stage of discussion. It makes clear that, for the purposes of the viability evidence base, it has been assumed that all infrastructure identified for provision on the site allocations will be delivered using the in-kind measures.
37. Looking first at the general concern of representors, a major factor is that there is currently a downturn in some sub-markets. The Local Plan examination showed clearly that the strategic sites are critical to delivery of the Plan's objectives. Flexibility is critical for all sites, and the representors suggest that in the last 3 or 4 years there has been very little flexibility shown by the Council. It is said that development management officers only want to talk about 35% affordable housing and are very reluctant to consider anything below 25%. With the CIL rates proposed, low affordable housing percentages are necessary to make a scheme work. CIL at 5% of scheme costs is a barrier to development: it is an upfront cost, and inflation is running at 3% or so each year. There are also concerns that the Council's in-kind approach does not meet the requirements of the CIL Regulations.

38. I now deal with the main detailed matters raised.

Site selection for viability testing

39. Bearing in mind that the 4 large sites were the subject of viability testing, the results of which led to the previous Examiner's recommendation, it is not surprising that there is concern that 3 of these sites (Wood Wharf, Westferry Printworks and the London Dock) have not again been selected for analysis. Section 3 of document CIL SD 01.4 sets out the rationale for the Council's selection of strategic sites for testing. In brief, the sampling approach was to focus on sites that the new Local Plan will rely on whilst avoiding excessive detail.
40. Guidance relating to viability testing of Local Plans describes that not every site needs to be tested. In particular, paragraph 6 of the Viability and Plan Making Planning Practice Guidance states: "*Assessing the viability of plans does not require individual testing of every site.....Assessment of samples of sites may be helpful to support evidence and more detailed assessment may be necessary for particular areas or key sites on which the delivery of the plan relies*".
41. A number of further practical matters have been considered, including the following: policy requirements of residential development are much more likely to impact on viability, so testing has focused on residential led schemes; testing the sites that propose to deliver the most housing (i.e. contribute most to the delivery of the Local Plan); not testing sites where there is a planning permission in place that is likely to be delivered or has already been implemented; where a number of sites have similar characteristics, only one of these sites has been tested; testing the sites that have the most significant cost burdens which may include the provision of on-site social infrastructure; and where there may not be sufficient information to facilitate the robust testing of a site then the site has not been tested.
42. The result of using the Council's criteria was that 14 strategic sites were selected for assessment. This seems to me to provide a suitable range of sites and I regard the Council's site selection process as both pragmatic and resulting in a sufficiently representative sample of sites.

Poor market conditions and residential sales values and rate of sales

43. Reference is made to the current market environment suggesting that the ILR presents an over positive economic view about the past 5 years. It is recognised that overall market values have increased since 2013, but it is said that new build values have stalled whilst construction costs have risen. Thus the ILR's present day position is said to be optimistic given the uncertainty that Brexit is having on the market. In addition changes to the stamp duty land tax and increased transaction costs on second properties are said to have had a significant impact. There is a significant risk of the country entering into recession during 2019.
44. Whilst there has been a review of the impact of house price growth, representations suggest that the impact of falls or rises in build costs has

not been undertaken. Whilst Land Registry data indicates that from March 2013 to November 2018 average property prices in Tower Hamlets have increased by 58% (whilst BCIS indicates construction cost have increased by 37%) the Land Registry data relates to all property, including second hand stock, whereas new build prices, particularly in the Canary Wharf area, are said to have seen a decrease over the past 12 to 18 months.

45. An additional concern expressed in representations is that the ILR assumed that 50% of residential units would be sold prior to practical completion and then 10 units per month until all units are sold in each phase. In the current market, and potentially for the foreseeable future, such sales rates are said to be very unlikely. One example given is that within the last 6 months, as at January 2018, there have been only 16 sales at the Canary Wharf Group Wood Wharf site.
46. The Council points out that a range of sales values were tested. In Zone 1 typologies tested values at high, medium and low residential value levels. A number of schemes are achieving around £1,350 psf and above. The new build data in the Land Registry database has been reviewed and confirms that, as of December 2018 (the most recent date for data availability) the average new build sales values across the Borough are 58.47% higher than the corresponding March 2013 values. Nevertheless, it is noted that average sales values of new build developments recorded through the Land Registry database have fallen over 2018 by circa 2.56%. Also, many property companies' residential forecasts identify a potential further drop of circa 2% in 2019. However, values are then forecast to return to growth from 2020 onwards. Development will take time to come forward and will benefit from a recovery in sales values. In any event, it is considered that the rates set for each of the areas are conservative as they are not based on the highest value and the CIL charges are not at the margins of viability.
47. I have no doubt that the decision to leave the European Union, the inconclusive negotiations and lack of a majority for any particular outcome within parliament to date has brought uncertainty generally and to the development sector in particular. Nevertheless the figures set out above do not paint quite such a gloomy picture as the representors' arguments suggest. The housing and commercial property markets are inevitably cyclical and there can be reasonable optimism that the market will improve, probably once a final outcome is achieved. I therefore consider that the sentiment in the ILR is not misplaced.

Benchmark Land Value (BLV)

48. Concern is expressed that low land values are compared with Residual Land Values deriving viable outcomes: but the low land values are unlikely to encourage the release of sites for development. The existing use value (EUV) approach is acceptable, but an Alternative Use Value (AUV) approach to BLV has not been tested. A number of the sites tested for example have commercial planning consents. A large number of schemes are only viable when compared to either BLV3 or BLV4, as well as dependent upon the residential values assumed.
49. Canary Wharf Group refers to the example in the ILR of a 3.84 ha site, based on open storage as the site is designated open land, with a BLV given

of £24.896m including a 20% premium. This represents 1.1% of the ILR stated Gross Development Value of £2.179billion, which is a major factor in the IRR of 21.75%. It is highly unrealistic in their view to expect a landowner to deliver a site like this to the market at this level given the development expectation for the site. They suggest that the Framework guidance seeks to ensure that a punitive approach to BLV does not render the site unviable.

50. Planning Practice Guidance⁴ stipulates that EUV + premium should be the basis for determining BLV, and the guidance clarifies that EUV is value in existing use, not price paid and disregards hope value. Transactions can be used only as a cross check on other evidence. In addition, site value for an alternative use must take account of full policy compliance. For the purpose of viability assessment alternative use value (AUV) refers to the value of land for uses other than its existing use. AUV of the land may be informative in establishing benchmark land value. If applying alternative uses when establishing BLV these should be limited to those uses which would fully comply with up to date development plan policies, including any policy requirements for contributions towards affordable housing at the relevant levels set out in the plan.
51. The approach taken in the ILR follows the guidance. In terms of using an AUV, the possible alternative development will vary from site to site and, it seems to me, the assembly of evidence necessary to take it into account would go beyond the requirement to use appropriate available evidence in the context of the practice guidance that "*Viability assessments should be proportionate, simple, transparent*"⁵. As paragraph 4.38 of the ILR explains: "*The four benchmark land values used in this study have been selected to provide a broad indication of likely land values across the Borough, but it is important to recognise that other site uses and values may exist on the ground. There can never be a single threshold land value at which we can say definitively that land will come forward for development, especially in urban areas*".
52. Whilst I can see the force of the Canary Wharf Group point (paragraph 49 above), I consider that the selection of BLV in the ILR has followed National Planning Practice Guidance and is suitable and adequate for a high level study that is proportionate and simple, although the word simple may not be readily applied to the ILR document that runs to almost 500 pages.

Build costs

53. Concerns have been raised about build costs, mainly in terms of a lack of information about the sources of the data and what is included. This was a

⁴ For the full guidance see Paragraphs: 013 Reference ID 10-013-20190509; 014 Reference ID: 10-014-20190509; 015 Reference ID: 10-015-20190509; 016 Reference ID: 10-016-20190509; and 017 Reference ID: 10-017-20190509, Revision date 09 05 2019

⁵ Paragraph: 019 Reference ID: 25-019-20190901, Revision date: 01 09 2019

matter that I included in the agenda of the hearing, but was told that this is not a major issue: no one present sought to put a contrary view.

Net to gross efficiencies ratios

54. A number of concerns about development efficiencies are raised in the representations. On behalf of Ballymore, it is said that, whilst all the planning consents referenced in Appendix A of the 'Additional Evidence and Information Document' of October 2018 have not been analysed, there is familiarity with a number of them, including Hertsmere House, 2 Hertsmere Road. The net to gross ratio is said to be 76% but the actual net to gross ratio is 65%, significantly less, which has a material impact on the viability appraisals. Further, there is no consideration of the impact on the net to gross ratio when providing 35% on-site affordable housing. South Quay Plaza 4 for example, cited in Appendix A, has 396 units of which 49 are affordable housing, short of the policy target. To provide 35% affordable units, it was suggested that an additional core and separate entrance would be needed for ease of management. The additional core and reduced residential net internal area of the development would impact on development efficiencies.
55. Representors also expressed concern that basement areas are not allowed for in the net to gross assumptions: this would also impact on the overall net to gross ratio and given that most sites within Canary Wharf and surrounding areas provide basements to meet planning requirements for the provision of car parking spaces and/or cycle spaces, plant and machinery, storage and so on, this needs to be considered. Excluding the basement areas overstates the viability of the project. Experience shows that schemes have on average a net to gross ratio of circa 74% excluding below ground areas. When factoring in below ground areas, this has a significant impact on the overall net to gross ratio. Therefore the accuracy and robustness of the ILR approach is questioned in the representations.
56. Strategic sites are generally more complicated given their scale, with basement areas needed as described, whilst upper floors may have more non-income producing space due to multiple entrances and cores, management/letting space and residential amenity. The 2017 North Quay application had a development efficiency of 63% compared with 78% in the ILR.
57. The Council counters by referring to research⁶ that found that gross to net ratios were actually higher than the assumptions adopted, therefore the assumptions are reasonable and actually provide a buffer. Inefficient schemes stem from developer's design. Efficiency of circa 75% is a reasonable assumption for a high level study. Developers seek to maximise efficiency and therefore values and increasing gross to net value is one way of doing so.

⁶ See section 4 of document 'Additional Evidence and Information Document'.

58. Even so, a sensitivity test of the North Quay a and North Quay b schemes to establish the impact of reducing the allowance from 80% to 75% resulted in an IRR of 19.85% as compared to 21.75% in the ILR for North Quay scenario 4a, and 20.11% from 22.62% in scenario 4b. Both remain viable as they are ungrawn IRRs above the identified threshold of 12%-14%. Sensitivity testing further reducing the ratio to 70% resulted in an IRR of 19.85% and 16.64% respectively – both again identified as being viable. Furthermore, WTP (professional Build Cost Consultants that were commissioned to provide specific advice on development costs, as an input to the Review) confirms that the build costs advice includes allowance for basements.
59. I see that Table 1 in the Council's 'Additional Evidence and Information Document' sets out the development efficiencies for 9 typologies plus strategic sites used in the ILR against the average development efficiencies for each typology as found in Appendix A to that document. Appendix A analyses 25 planning permissions granted between 1 April 2015 and 29 March 2018. Table 1 shows that in 7 typologies and the strategic sites (in 2 cases the evidence was not available) the development efficiency of the permitted schemes was higher than the level input into the ILR – generally by about 6 to 8 percentage points. However, I also note that for the strategic site typology (within which there were 4 example permissions) the difference was only 2 percentage points, but also upwards.
60. Whilst the Ballymore representations provides an "actual net to gross ratio" of 65% for Hertsmere House (1 of the strategic sites in Appendix A) there is no explanation that effectively challenges the Council's figures. It might have been thought, for instance that a table of floorspace in different categories of revenue and non-revenue producing areas would be submitted. Similarly, for Canary Wharf Group, floorspace figures are given with efficiency percentages alongside, but this is not compelling when a representation is challenging the evidence of the Charging Authority. I would expect robust detail to be provided by the challenger. Finally for Bishopsgate Goods Yard it is simply pointed out that none of the planning permission given over the past 4 years are as complex and challenging as BGY.
61. I conclude that the Council's Table 1 referred to above, and Appendix A that the data is drawn from, is convincing evidence for this input into the ILR.

Affordable housing values

62. A question was raised in relation to affordable housing values, about the average pounds psf rate arrived at in the strategic site appraisals. Bishopsgate Goods Yard is an example where a rate of £376 psf for Shared Ownership is quoted, but £443 for London Living Rent. Experience suggests that Shared Ownership is more valuable than London Living Rent and it is assumed that this must be an error. In addition, Social Rent at £229 psf and Tower Hamlets Living Rent at £305 pounds psf are in excess of recent experience and it is considered that the value of affordable housing is overestimated in the ILR.
63. The Council's response to this is that the assessment of Shared Ownership and London Living Rent used a bespoke model to value the affordable

housing which replicates how registered providers undertake such appraisals. For shared ownership units, it was assumed that RPs will sell 25% initial equity stakes and maximum rent charge of 2.75% on the retained equity. This is subject to GLA income caps. London Affordable Rents, Tower Hamlets Living Rents and London Living Rent were valued based on the rents specified by the Council and the GLA as appropriate. The model runs cashflows for the rented tenures in the borough over a period of circa 35 years that capitalises the net rental income stream. The net rent is then calculated by taking into account factors such as: standard levels for individual Registered Providers' management and maintenance costs, finance rates that are currently obtainable in the sector, and allowance for voids and bad debt.

64. I have received no further representation on this and I am satisfied that the ILR incorporates the correct figures.

Individual schemes

65. In addition there are representations about individual development sites, such as questioning where the Zone boundary should be drawn, as in respect of Crossharbour Town Centre. It is pointed out that this site is located on the southern and eastern edge of Zone 1, but properties immediately to the east are in Zone 2. The CIL Zone 1 designation covers City Fringe and North Docklands. It is suggested that it is clearly inappropriate to include Cubitt Town in the same zone. The same argument was put to the previous Examiner, who found that "*the Council's contention that any new residential development in this area would be highly likely to be smaller but of a higher quality is a persuasive one. Consequently, the assumption that the value (psm) of new residential development in Cubitt Town would be higher than that of some existing property in this area is sound*"⁷. There is nothing that inclines me to a different view.
66. In any event, CIL viability testing is 'high level' and cannot reasonably get into the detail of every allocated site. It is necessary only that it relies on proportionate and appropriate evidence to demonstrate that development will remain viable across most of the area if the charge is applied.

Conclusion

67. In considering whether the level of CIL for residential development is justified, I have come to the following conclusions: that the 14 strategic sites selected for testing provided a suitable range of sufficiently representative sites for assessment; that the market conditions and residential values and sales were suitably identified; that the net to gross efficiency ratios were based on good evidence; and that the correct figures were used for affordable housing values in the ILR. On this basis I conclude that the level of CIL for residential development charges in the DCS are justified.

⁷ Examiner's Report, November 2014, paragraph 26.

Is the level of CIL proposed for office development justified?

68. There was concern about the impact of the office rates that are proposed to be applied to developments that are currently nil rated. Following discussion at the hearing I invited further representations to be submitted on this matter. The following is the gist of those representations.
69. An interesting commentary on the North Docklands office market prepared by CBRE was submitted, including the following comments:
- Vacancy in the Docklands is high relative to trend. At the end of Q2, the Docklands vacancy rate was 7.1%, compared with the 10-year average of 6.5%. Availability (which includes space which will become ready to occupy within 12 months) in Docklands is similarly high, standing at 1.5m sq ft, ahead of the 10-year average of 1.4m sq ft. Of the 10 largest available units across Central London, four are located in the Docklands, the same number as are located in the City. This is despite the fact that the City is almost three times the size of the Docklands in terms of office stock. In addition to the units currently being marketed, there is a significant proportion of Docklands stock which could be available on a sublet basis but is not currently being marketed (grey space). As a result, availability in Docklands is likely to be higher than the officially stated position. As a proportion of total stock, there is more space due to come on-line in the Docklands than in any other Central London market, in terms of the development pipeline, second-hand space and sub-let availability. As a result, looking ahead, vacancy in Docklands is likely to see a steeper rise than other markets, where demand and supply are forecast to be more balanced.
 - Pre-letting activity is well below that of 20 or so years ago, although there has been an increase in the first half of 2019 with a significant deal at 5 Bank Street. Pre-letting in the last 10 years is considerably lower than it was at its peak. Over the last 10 years, pre-lets have accounted for 1.5m sq ft of Docklands take-up, 16% of all deals. By way of comparison, in the five-year period between Q3 1998 and Q2 2003, pre-letting activity in Docklands totalled 7.2m sq ft, 80% of the market.
 - Construction starts tend to follow pre-letting activity levels. Over the last 12 months, construction starts have totalled 331,038 sq ft, all of which is accounted for by the refurbishment of 25 The North Colonnade, which went under construction in Q3 2018. In the last 10 years, development starts in Docklands have totalled 2.4m sq ft. By way of comparison, in the period 1999-Q1 2001, 7.9m sq ft of developments commenced construction.
 - Looking at rental values, there is something of a two tier rental market within the Docklands, and Canary Wharf specifically, whereby achievable rents are significantly lower for tenant release space. Prime rents in the Docklands stood at £48.50psf at the end of Q2 2019 while the rent-free period on a 10-year lease has moved out during past three years from 24 months to 24-27 months. Looking forward, forecasts suggest that the Docklands prime rent will increase to £52.00psf by the end of 2023. This represents the slowest annualised growth rate of the main London markets at 1.6% (the others being 1.7% in the City, 1.9% in Midtown and 2% in Southbank and West End). In real terms (deflating by CPI), rents have fallen by 2.8% since 2015 and will fall a further 4.3% between the end of 2019 and the end of 2023. Rent free periods in the Docklands

are expected to revert to 24 months over the same period. Compared to cyclical highs preceding the financial crisis, prime rents in the Docklands are significantly below the cyclical peak in real terms, which was £63.22psf (£47.50 psf in nominal terms) in Q1 2007. The same is true for the City and West End.

70. The Council responds thus:

- As far as vacancy and take-up is concerned, PROMIS figures also show Q2 2019 availability within Docklands at 1,820,000 sq ft, down from 2,192,000 sq ft in 2018 and 2,502,000 sq ft in 2017. Vacancy is shown to be at 8.9% (down from 10.9% and 12.4% in 2018 and 2017 respectively). The vacancy rates quoted also include schemes which are under construction, to be completed within the next 12 months and understood to have some 20% of this space pre-let at present. Knight Frank & PMA figures show take-up in Q2 2019 to be 458,200 sq ft, more than double the 10-year quarterly average of 223,000 and the highest quarterly level since Q4 2016. Data for the wider East London sub-market corroborates this. The Canary Wharf Estate has recently diversified its occupier base to include Fintech and Media Tech companies, and major government departments have committed to taking space in the Docklands. Due to the nature of the space and occupiers in the Docklands market, who frequently take leases over entire buildings, take-up and vacancy rates are still affected by these "lumpy" transactions, in contrast to other central London markets where smaller spaces are typically taken.
- In terms of letting, 284,704 sq ft has been sublet from EMA by WeWork at 30 Churchill Place, as of Q3 2019: it is understood fitting out has begun, aiming to open in December. This follows a Q1 letting of 72,200 sq ft to Spaces at The Cabot, 25 Cabot Square, where £50 psf was achieved on the top floor. Whilst not fully pre-let, the most recent large-scale completion in Canary Wharf, 5 Bank Street (Q2 2019) was mostly let to Société Générale and the European Bank for Reconstruction and Development (280,000 sq ft pre-let to Société Générale, 365,000 sq ft let U/C to the European Bank for Reconstruction and Development, of a total of 694,600 sq ft so 93% pre-let or let U/C). Named active requirements reportedly reached 912,000 sq ft in Q1 2019, increasing for a second consecutive quarter, and nearly doubling the long-term average of 458,000 sq ft. The Docklands office market has matured significantly over the past two decades, and comparing the present day with the late 1990s and early 2000s can show a distorted and pessimistic view of figures relating to construction starts. When considering the data in the respondent's table on take-up and construction starts from, say 2010 to the present day, the market appears more consistent, and in fact the period from 2017 onwards appears relatively strong, when considered in the context of the 2010-2020 decade.
- With regard to construction starts, if these are related to pre-lets, the levying of CIL would not have a significant impact on whether a scheme goes ahead. Rather, CIL would be considered to be a cost of construction incorporated after the decision to proceed has been made, based on demand-side factors. The office CIL charge in the Docklands will equate to some 1.67% of development costs, which is unlikely to adversely impact on the deliverability of development. The CBRE document states that over the last 10 years only 16% of all deals of new space in the Docklands have been pre-lets. The Promis Report identifies that of the

current emerging stock 20% is subject to pre-let. Developers are clearly choosing to take the risk given the demand and supply dynamics and there are market justifications to do so. Given this, it is arguable that pre-lets do not play a large part in influencing the delivery of office space in this market as otherwise significantly less stock would be being delivered. Although construction starts within Canary Wharf in the past 12 months totalled 331,038 sq ft, when a wider area extending to Wood Wharf is considered, this increases significantly, with c.273,000 sq ft under construction at 20 Water Street and c.60,000 sq ft at 15 Water Street under construction.

- Referring to rents, Carter Jonas' Occupancy Cost Map for Q2 states Canary Wharf rents to be £52.50 psf (unchanged since its Q1 publication). Refurbished rents range from £35.00 psf to £42.50 psf. Knight Frank meanwhile recorded prime rents as of Q1 2019 as being at £47.00 psf. This follows a general recovery since the low of 2008/9. BNP Paribas Real Estate's Central London Offices Report for Q2 identifies that prime rents have increased to £48.50 psf. PMA records top rents in Docklands as staying flat in Q2 2019. They also indicate that Docklands rents broadly follow the pattern seen in the City over the longer term, suggesting changes are structural rather than specific to the sub-market. The ILR adopted a rent of £45 psf, which remains reasonable, if conservative in light of the above.

71. Beginning with vacancy, looking at the 2 sets of figures, it appears to me that the comparison in the representor's 10 year average is misleading in the sense that the figures for the more recent period of 2017 to 2019 show a reduction in vacancy, representing an improving confidence in the market. The availability of space, which includes that which will be ready within 12 months, also suggests that development is proceeding in anticipation of successful marketing. Again it is said that, as a proportion of total stock, more space is due to come on line, including in terms of the development pipeline – suggesting a degree of confidence.
72. The Council's figures for pre-lets, the highest quarterly level since Q4 2016 supports this conclusion. In terms of figures for pre-letting, the representors make comparisons with 20 or so years ago, although admitting that there has been an increase in the first half of 2019.
73. I consider the representors' figures for construction starts, which compare the last 10 years of starts in Docklands with the period 1999-Q1 2001, to be misleading. In terms of judging the impact of CIL, it is more recent years that are relevant to the current market. As the Council points out, the proposed office CIL charge in the Docklands equates to some 1.67% of development costs, which is unlikely to have an adverse impact on delivery. The Council's figures for construction starts that include the wider area extending to Wood Wharf also support a more optimistic outlook.
74. Looking at the figures for rental values, it appears to me that comparing the cyclical highs preceding the financial crisis with present day rental values, when there has been 3 years of uncertainty because of the Brexit referendum is not helpful, and I note that the situation is the same for the City and the West end. Furthermore, on the Council's figures there does seem to be a general recovery since the low of 2008/9. Its figures also are indicative that the adopted rent of £45 psf in the ILR is reasonable.

Conclusion

75. I am led to conclude that there is no compelling evidence to persuade me otherwise than that the office rate as proposed for the City Fringe and North Docklands areas is justified.

Other matters

76. There was the suggestion that residential 'Build to Rent' is a new asset class and a new typology, and that work should be done to augment the ILR before the DCS is adopted. I was told that it is not a class of residential development that the Council considers important. In my view there is no justification for delaying the introduction of the new rates on this basis.

77. There are representations that queried the placing of Zone boundaries down the middle of main routes, suggesting that viability consideration must be the same both sides of the road. This will not always be the case, and I am assured that the evidence that informed the boundaries of the zones took account of frontage development as well as the nature of development in the hinterland to the rear.

78. There were representations about 3 gasworks sites – these sites having been shown in the ILR as having very severe viability constraints. I received a request for these sites to be considered during the examination hearing. However, negotiations had continued in the meantime, apparently to some good effect. There was no participation at the hearing in respect of the gasworks sites and I am informed that the developer, St. William, and the Council have an in principal agreement on a Payment in Kind mechanism for the Leven Road site, which addresses the concerns.

79. In the run-up to the hearing Amendment No.2 to the CIL Regulations was made in parliament, to come into effect on 1 September. I put an item on the hearing agenda because 3 features of the revisions to the regulations seemed to me to be potentially important in terms of the matters under discussion, in particular the amendments that:

- give authorities more flexibility over the use of CIL and s106 planning obligations, by removing pooling restrictions that limit the number of planning obligations that can be used to fund a single infrastructure project, and by allowing planning obligations to fund infrastructure also being partly funded by CIL
- make CIL fairer by ensuring that where a planning permission is altered and a new CIL liability created, the most recent CIL rate is only charged on the altered area
- make CIL fairer by allowing multi-phased developments which were originally consented prior to CIL adoption, and are amended post CIL adoption, to offset increases in liability in one phase against decreases in another phase, to ensure that the final CIL liability reflects the amount of floorspace developed.

80. In the event it was thought to be too early to understand the implications of the amendments, and the promised revisions to planning practice guidance dealing with them would need to be studied and understood.

81. A concern was raised in the representations about the nil rate for affordable student housing because advantage could be taken of the situation by the developer offering affordable student accommodation only for a short period and then changing to market student housing having benefited from the nil rate. The Council considered this issue when the Local plan was drafted. The following is an extract from the latest version of the draft Local Plan with main and additional modifications:
"Student Housing: 4.6 24 Part 1 (a) supports the delivery of affordable student housing in accordance with the London Plan (GLA, 2016). We will use the Housing Supplementary Planning Guidance (GLA, 2016) to negotiate the proportion of affordable housing, its cost and its allocation to students (an indication of the level of rent and the proportion of affordable housing will be provided through the London Plan annual monitoring report). This suggests that the cost should be no more than 55% of average student income for a UK full-time student living in London away from home, and suggests that the proportion of affordable housing should be the maximum reasonable amount, subject to viability. Planning obligations will be used to secure the affordability and availability of the affordable accommodation for as long as the student housing use continues".
82. For clarity, the Council intends to amend the current footnote of the DCS as follows: Proposed footnote ***** Student housing, provided in the form of affordable student housing as defined by the Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (Regulation 19 version), secured by a s106 planning Obligation. The nil rates will only apply if the affordable student housing remains affordable in perpetuity.*
83. I support the clarification that would be achieved by the revised footnote, and will leave the Council to carry out its intention.

Overall conclusion

84. There were no issues raised, other than those dealt with above, that amounted to anything more than an expression of opinion or objection without any or adequate evidence.
85. The main controversy in respect of the rates proposed in the DCS concerned the proposal of the Council to reverse the decision reached on the extant Charging Schedule, on the recommendation of the previous Examiner, and impose charging rates on the 4 large designated sites. Reading the report of the previous examination, it is clear that the Examiner recognised that these large sites would not be viable unless there was 'flexing' of the affordable housing policy below what he regarded as a minimum acceptable level of 25%.
86. The situation before me is somewhat different: there appears to have been an improvement in the development climate, although Brexit uncertainties are still a major factor, and the evidence is clear that most development will not have its viability undermined by the level of charges proposed.
87. But even if the viability of large sites were to be compromised without flexing the affordable housing policies, it is now clear that the Council is prepared to take a balanced view about the priority that should be put on

providing much needed essential infrastructure versus the continuing need for the delivery of affordable housing. The policy decision to be flexible, to ensure that development of the site allocations is viable, is being written into the emerging Local Plan that I understand is on the verge of adoption. The following are the relevant Main Modifications.

- Main Modification 2 concerns Policy D.SG5: Developer contributions, Part2: it inserts a new criterion after part 1 – *"2. For site allocations the policies set out in this plan may be applied flexibly to ensure that the sites are viable and deliverable"*.
- Main Modification 3 also concerns Policy D.SG5: Developer contributions after paragraph 2.45 it inserts a new paragraph and renumbers the paragraphs accordingly – *"2.46 Part 2 seeks to provide flexibility in the determination of planning applications relating to the site allocations (as outlined in section 4) to ensure that development is viable and can be delivered during the plan period, having regard to the provision of infrastructure and other site specific requirements set out in the plan"*.

88. The political decisions about the priorities to be attached to the various categories of planning obligations are for the Council to make. It is clear to me that, in accordance with the new Local Plan 2031, as intended to be adopted, there is a formal policy to allow these decisions to be made in accordance with the policies of the development plan. In addition to the S106 route, I was told that affordable housing is also delivered through council housing and registered providers, using public land.
89. There were further matters put to me at the hearing. Firstly the 4 large sites would not amount to the delivery of a critical amount of residential development to meet the Local Plan's requirements. Secondly, the London Borough of Tower Hamlets has 100% met the Housing Delivery Test, which demonstrates that the CIL rates are not inhibiting development. In addition, the Housing Trajectory (Appendix 7 of the emerging Local Plan) is supplied in the Council's document 'Further Evidence Post Hearing'. This shows numbers for completed developments, under construction, prior approval, full planning permission, outline planning permission and windfalls. The totals are as follows: 2016/21 - 22,515; 2021/26 - 19,676; and for 2026/31 - 12,697. The total for the whole period is shown as 54,889. It can be seen that for the current period, the Council is well on the way to achieving the target.
90. I therefore conclude that, in setting the CIL charging rates, the Council has had regard to detailed evidence on infrastructure planning and the economic viability evidence of the development market in the London Borough of Tower Hamlets. The Council has been realistic in terms of achieving a reasonable level of income to address a gap in infrastructure funding, while ensuring that in general development remains viable across most of the authority's area. It has made decisions about its priorities for bringing in funds through CIL and obtaining contributions through section 106 agreements. An appropriate balance has been struck.

Are the Legal Requirements met?

91. The Legal Requirements are met:

- The Charging Schedule complies with national policy/guidance
- The Charging Schedule complies with the 2008 Planning Act and 2010 Regulations (as amended), including in respect of the statutory processes and public consultation, consistency with the Local Plan and the Infrastructure Delivery Schedule, and is supported by an adequate financial appraisal.

92. I conclude that, the London Borough of Tower Hamlets Community Infrastructure Levy Charging Schedule, submitted for examination on 24 May 2019, satisfies the requirements of Section 212 of the 2008 Act and meets the criteria for viability in the 2010 Regulations (as amended). I therefore recommend that the Charging Schedule be approved.

Terrence Kemmann-Lane

Examiner



Community Infrastructure Levy (CIL)

Charging Schedule

October 2019

1. The Charging Authority

The London Borough of Tower Hamlets is a Charging Authority for the purposes of Part 11 of the Planning Act 2008 and may therefore charge the Community Infrastructure Levy (CIL) in respect of development in its Charging Authority area.

2. Date of Approval

2.1 This Charging Schedule was approved by the Council on (TBC).

3. Date of Effect

3.1 This Charging Schedule will come into effect on (TBC).

4. Liability to Pay CIL

4.1 A chargeable development is one for which planning permission is granted and or which is liable to pay CIL in accordance with the CIL Regulations 2010 (as amended). CIL will be chargeable on the net additional floorspace (gross internal area¹) of all new development apart from those exempt under Part 2 and Part 6 of the Community Infrastructure Levy Regulations 2010 (as amended). These exemptions include:

- Developments where the gross internal area of new build² on the relevant land will be less than 100 square metres except where the development will comprise one or more dwellings;
- Buildings into which people do not normally go, or go into only intermittently for the purpose of inspecting or maintaining fixed plant or machinery;
- Development where the owner of a material interest in the relevant land is a charitable institution³ and the development will be used wholly (or mainly) for charitable purposes.

4.2 In addition, the Regulations also allow exemptions to be claimed for self-build housing, and residential annexes and extensions over 100 square metres (regulation 42A and 42B). Affordable housing will be eligible for relief from CIL (regulation 49).

¹ Please refer to the accepted method of calculation set out in the Royal Institution of Chartered Surveyors' Code of Measuring Practice: A Guide for Professionals.

² Please refer to Part 2 of the CIL Regulations 2010 (as amended).

³ Please refer to Part 5 of the CIL Regulations 2010 (as amended).

5. CIL Rates

5.1 The Council intends to charge different rates of CIL by the land use of a proposed development (expressed as pounds per square metre) and by the area where a proposed development is situated, as set out in the Table 1 below.

5.2 The Council is designated as the 'Collecting Authority' for the CIL of the Mayor of London. This requires a Mayor of London CIL to be charged in addition to the rates described in the table below.

Table 1 Proposed Rates

Development Type	Proposed CIL rate per m ² (GIA) of development		
	Zone 1	Zone 2	Zone 3
Residential	£280	£150	£50
Offices	City Fringe and North Docklands		Rest of Borough
	£100		Nil
Retail (Except Convenience Supermarkets/ Superstores and Retail Warehousing)	£100	£100	Nil
Convenience Supermarkets/ Superstores* and Retail Warehousing**	Borough Wide		
	£130		
Hotel	£190		
Student Housing Let at Market Rents***	£450		
Student Housing Let at Below Market Rents****	Nil		
All Other Uses	Nil		

* Convenience Supermarkets/Superstores are defined as shopping destinations in their own right, where weekly food needs are met, catering for a significant proportion of car-borne customers, and which can also include non-food floorspace as part of the overall mix of the unit.

** Retail Warehousing is defined as shopping destinations specialising in the sale of household goods (such as carpets, furniture and electrical goods), DIY items and other ranges of goods, catering for a significant proportion of car-borne customers.

*** Student housing not falling with the definition at **** below.

**** Student housing, provided in the form of affordable student housing as defined by the *Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (Regulation 19 version)*, secured by a s106 planning obligation. The nil rates will only apply if the affordable student housing remain affordable in perpetuity.

6. Charging Zones

- 6.1 The charging areas (Zones 1 to 3, City Fringe and North Docklands) referred to in the above table are illustrated on the Charging Zones Maps, attached at Appendix 1 of this document. The maps also identify the area of Tower Hamlets that falls within the boundary of London Legacy Development Corporation. Developments in these locations are not covered by this document and are subject to a Community Infrastructure Levy Charging Schedule adopted by the London Legacy Development Corporation.

7. Calculating the Chargeable Amount

- 7.1 CIL will be calculated on the basis set out in Part 5 of the Community Infrastructure Levy Regulations 2010 (as amended).

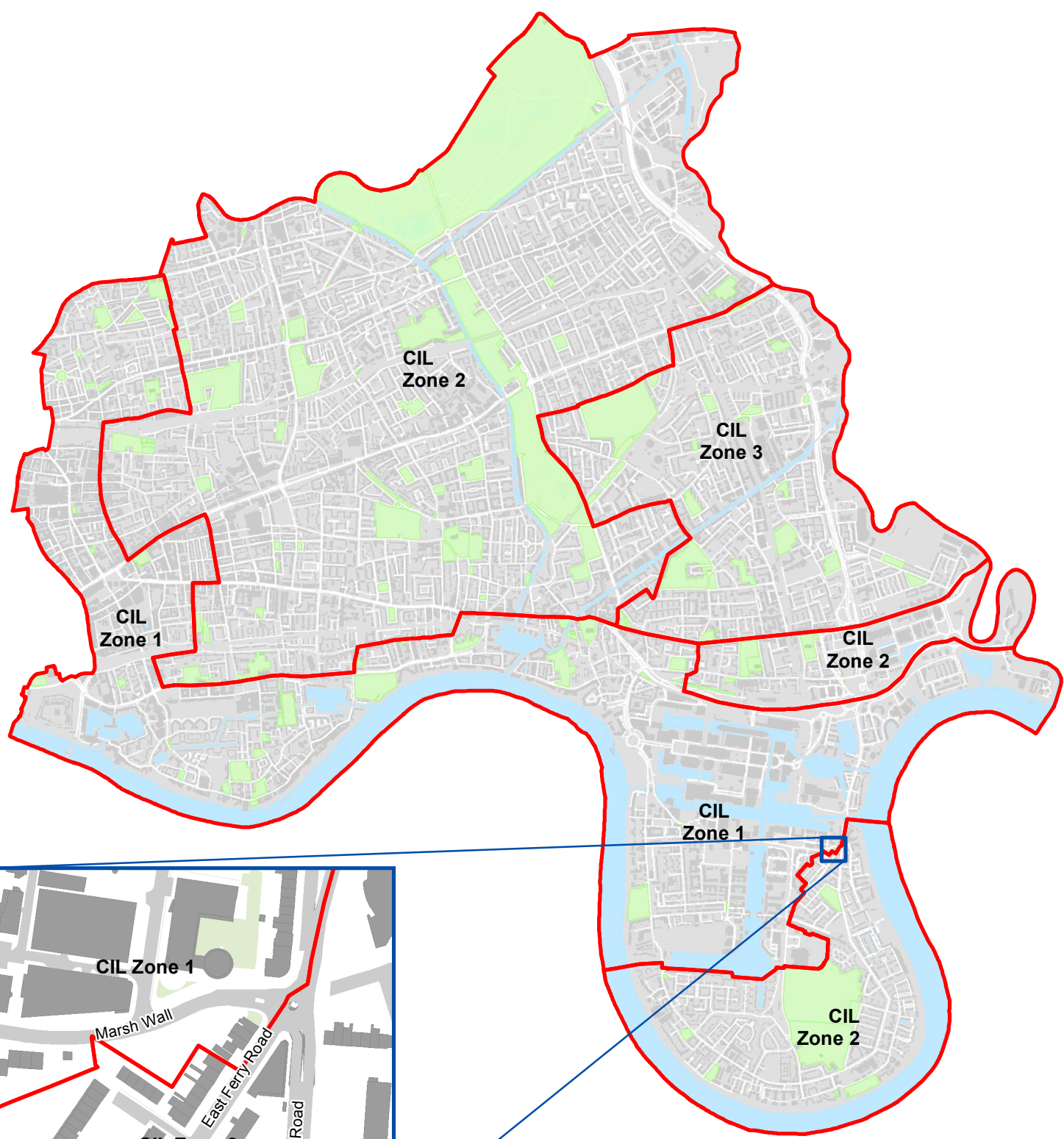
8. Inflation and Indexation

- 8.1 The rates referred to in Table 1 above shall be subject to annual indexation in keeping with the “All-in Tender Price Index” published by the Building Cost Information Service (BCIS). The rates should be increased by an amount equivalent to the increase in the index from the date hereof until the date on which the sums are payable provided that in the event that the “All-in Tender Price Index” shall decrease, the sum not fall below the figures set out.

9. Further Information

- 9.1 Further information on the Community Infrastructure Levy is available on the Council’s website www.towerhamlets.gov.uk/CIL

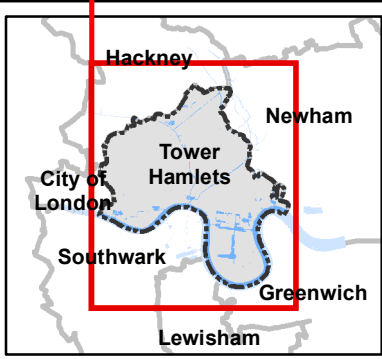
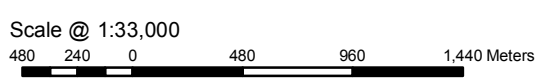
Appendix 1: Charging Area Maps

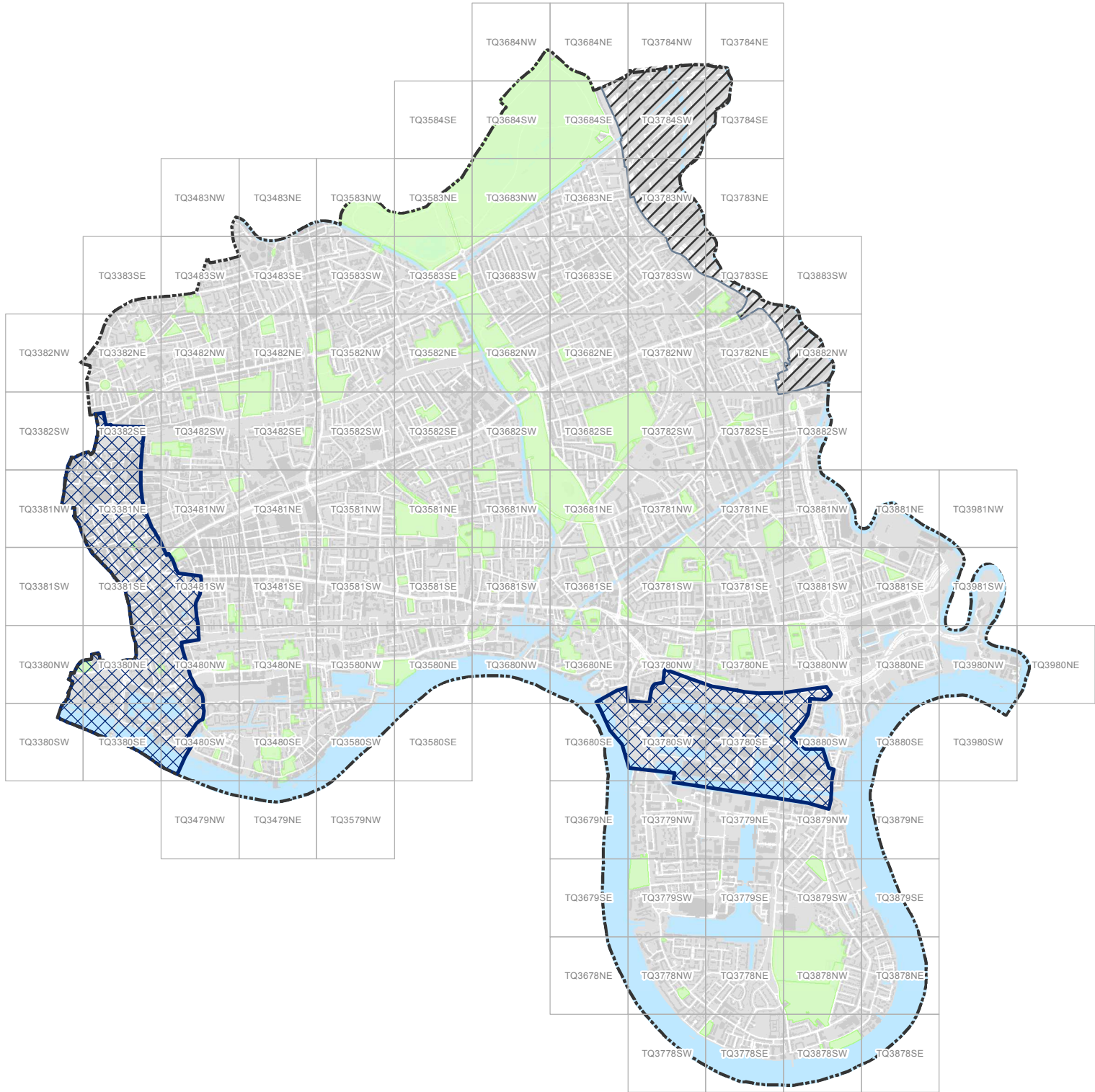


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CIL Residential Charging Zone Boundaries



CIL Residential Charging Zone Boundaries



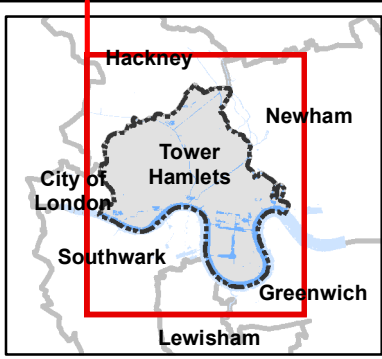


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Office and Retail (except Convenience Supermarkets, Superstores and Retail Warehousing) Charging Zones

 LLDC Boundary
 Office and Retail Charging Zones

Scale @ 1:35,000
 510 255 0 510 1,020 1,530 Meters



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London Borough of Tower Hamlets

Community Infrastructure Levy (CIL)

Draft Charging Schedule

Statement of Modifications

May 2019

1. Introduction

- 1.1 The Council has decided to amend a boundary of one of the proposed CIL charging zones and as such have prepared this Statement of Modifications.
- 1.2 Under the provisions of the CIL Regulations 2010 (as amended), the Council is able to modify the CIL Draft Charging Schedule (DCS) following publication and consultation. Where changes are proposed the Council is required to produce a Statement of Modifications, inform consultation bodies invited to make representations on the Draft Charging Schedule, and provide an opportunity to request a right to be heard by the Examiner in relation to the proposed changes.

2. Modifications to the Draft Charging Schedule

- 2.1 This Statement of Modifications sets out the modifications which have been made to Tower Hamlets' Draft Charging Schedule. As set out below, the modifications made are limited to a small boundary change. The boundary change was proposed subsequent to a planning appeal decision resulting in potential development coming forward which otherwise would have remained within a conservation area.
- 2.2 The DCS was published and subject to a supplementary consultation on 14th March 2019. The Council received representations from six representors to the Draft Charging Schedule within this consultation period, which ended on 25th April 2019.

3. Publication

- 3.1 As required under Regulation 19 of the Regulations, a copy of this Statement of Modifications has been sent to each of the persons that were invited to make representations under Regulation 17 and it has been published on the Council's website at: <http://www.towerhamlets.gov.uk/cil>.
- 3.2 This Statement of Modifications will also be made available at the Town Hall and in Idea Stores across the Borough for inspection during business hours.

4. Requests to be Heard

- 4.1 Any person may request to be heard by the Examiner in relation to the modifications set out in this document. The Council has already received requests with regard to the Draft Charging Schedule. There is no need to repeat those requests to be heard at this stage. It is only if any person wishes to exercise their right to be heard in relation to the modifications set out in this document that they need to inform the Council.
- 4.2 Any request to be heard by the Examiner in relation to these modifications must be:
 - Submitted to Tower Hamlets Council in writing before the end of the period of four weeks beginning with the day on which the Revised Draft Charging Schedule is submitted to the Examiner in accordance with Regulation 19 (1).
 - Include details of the modifications (by reference to this Statement of Modifications) on which the person wishes to be heard.
- 4.3 Persons requesting to be heard should indicate whether they support or oppose the modifications and explain why.

- 4.4 In accordance with the Regulations, a copy of each request to be heard in relation to these modifications will be forwarded to the Examiner.
- 4.5 Requests to be heard may be withdrawn at any time before the opening of the Examination by giving notice in writing to Tower Hamlets Council.
- 4.6 A request to be heard by the Examiner in relation to these modifications must be made in writing by post or email to:

Infrastructure Planning

London Borough of Tower Hamlets

2nd Floor, Mulberry Place

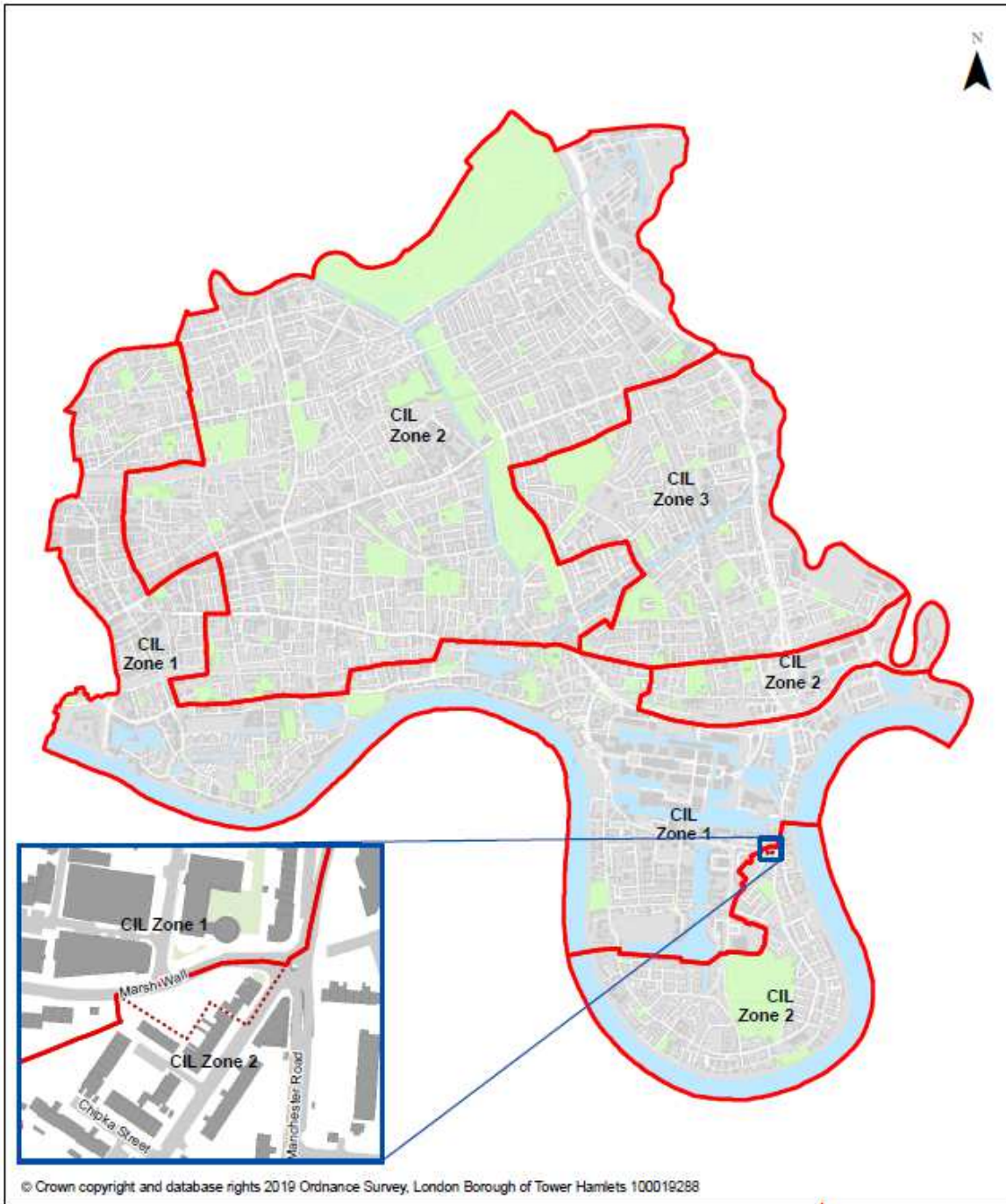
5 Clove Crescent

E14 1BY


Email: viability@towerhamlets.gov.uk (Subject: Request to be heard by the Examiner – CIL 2019)

5. Proposed Modifications

- 5.1 The proposed modification relates to the charging area shown in Appendix 1 of the Revised Draft Charging Schedule. For ease of reference the proposed amendment is shown below:

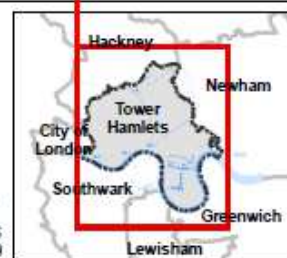


Proposed New CIL Residential Charging Zone Boundaries
Proposed additional boundary

-  Proposed CIL Residential Charging Zone Boundaries
-  Proposed additional boundary

Scale @ 1:33,000
480 240 0 480 960 1,440 Meters


GIS for Place Directorate
LONDON BOROUGH OF TOWER HAMLETS
Date: 22/05/2019



- 5.3 The proposed modification to the boundary at zone 1 has been shown as the red dotted line. The existing proposed boundary is outlined in a bright red line.
- 5.4 The appeal decision referred to has been appended to this document.

Appendix 1 – Appeal Decision (2 East Ferry Road, London, E14 3LA-APP/E5900/C/17/3184929)



Appeal Decisions

Inquiry Held on 13-14 November 2018

Site visit made on 12 November 2018

by Simon Hand MA

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 17 December 2018

Appeal A: APP/E5900/C/17/3184929 2 East Ferry Road, London, E14 3LA

- The appeal is made under section 174 of the Town and Country Planning Act 1990 as amended by the Planning and Compensation Act 1991.
 - The appeal is made by Angelic Interiors Limited (in administration) against an enforcement notice issued by the Council of the London Borough of Tower Hamlets.
 - The enforcement notice was issued on 21 August 2017.
 - The breach of planning control as alleged in the notice is the unauthorised demolition of an unlisted building in a conservation area without planning permission.
 - The requirements of the notice are to rebuild the building so as to recreate in facsimile the building as it stood immediately prior to its demolition on 26 June 2016 with reference to the photographs and plans (LBTH file reference PA/84/00512 & PA/81/00497 originals of which are available at the Tower Hamlets Council's Town Hall) in appendix A.
 - The period for compliance with the requirements is 18 months.
 - The appeal is proceeding on the grounds set out in section 174(2) (a), (f) and (g) of the Town and Country Planning Act 1990 as amended.
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Decisions – 3184929, 3184938 & 3184939

1. All three appeals are allowed, the enforcement notices are quashed and planning permissions are granted on the applications deemed to have been made under section 177(5) of the 1990 Act as amended for the development already carried out, namely the demolition of Nos 2, 4 and 6 East Ferry Road, London, E14 3LA referred to in the notices, subject in each case, to the following condition:
 - 1) Within 3 months of the date of this permission a scheme for the interim treatment of the site (either on its own or with other land) shall be submitted to the local planning authority for its approval. The scheme shall address:
 - (a) the clearance of debris, building materials and hoardings from the site;
 - (b) the proposed boundary treatment of the site, including any proposed new fencing or hoardings to be erected;
 - (c) the proposed landscaping of the site and any future maintenance of such; and
 - (d) a timetable for the implementation of the measures set out in the scheme.

The approved scheme shall be carried out and completed in accordance with the approved timetable.

Other Appeals

2. Appeals B (3184938) and C (3184939) are identical to appeal A, but refer to 4 East Ferry Road and 6 East Ferry Road respectively. The enforcement notices for Nos 4 and 6 are also identical to that for No 2.

Costs Applications

3. An application for costs against the Council has been made by the appellants, and this is the subject of a separate decision letter. An application for costs was also made by the Council against the appellants who were not represented at the Inquiry – see below. This is subject to a separate decision by the Secretary of State.

Preliminary Matters

4. Originally these appeals were to be heard together with three other appeals for the same sites and enforcement notices APP/E5900/C/17/3185060, 3185062 and 3185063. These appeals were made by Kemwood Properties and Fitzjohn Limited, both companies owned by Ms Julia Davey. At the last minute the solicitors acting for Ms Davey were unable to get instructions from her, for reasons they were unable to divulge. They therefore pulled out of the Inquiry which went ahead to hear the appeals by Angelic Interiors. Angelic, themselves are in administration and the appeal was conducted by their administrators.
5. Angelic and Ms Davey have been in dispute over the ownership of the three buildings for some time, but it appears from the evidence of Mr Davey who is Ms Davey's brother, that he was responsible for the day to day maintenance of the buildings for some years and for their eventual demolition. At the Inquiry Angelic provided a note explaining they had, on 31 October, been successful in their dispute with Ms Davey and were now the legal owners of the three sites. But as noted above they had had nothing to do with the buildings for many years and nothing to do with their demolition.
6. The appellants have raised the issue that the enforcement notice is a nullity as it fails to adequately explain what the appellants are required to do in order to fulfil the requirements of the notice and that the officer who signed it did not have the requisite delegation to do so. I deal with both those issues below.

Nullity Arguments

Inadequate requirements

7. The first argument is that the notice is defective as it does not clearly tell the appellants what they need to do. In my view the requirements of the notices are quite clear and the information given is adequate to enable that to happen. I was referred to Miller-Mead¹ and Oates v SSCLG² amongst others and the proposition that the notice should be clear within its four corners is well known. The Oates case is particularly useful as it confirms that there must be

¹ Miller-Mead v MHLG [1963] 2 QB 196

² Oates v SSCLG [2017] EWHC 2716 (Admin)

- “reasonable certainty” as to what is required, but that the requirements must be considered in context and not with an overly formulaic or legalistic approach.
8. In my view the context of the notices is clear, they were, according to the Council, unlisted but characterful buildings which had an architectural and historic importance in the conservation area. The problem for the appellants is the use of the word “facsimile” which means ‘an exact copy’. They argue that they have little information as to exactly what the rear and flank walls looked like and virtually no information as to the interior.
 9. The power to require a new building is contained in s173(6) of the 1990 Planning Act. This says “*Where an enforcement notice is issued in respect of a breach of planning control consisting of demolition of a building, the notice may require the construction of a building (in this section referred to as a “replacement building”) which, subject to subsection (7), is as similar as possible to the demolished building*”. I agree it would have been better had the Council used the words “as similar as possible” rather than facsimile, but it seems they were guided by the well-known appeal decision which required the rebuilding of Carlton Tavern in facsimile. In that case the pub was about to be listed and had been subject to considerable scrutiny by the Council prior to its demolition, so that detailed plans and photographs were available. In this case the notices include photographs of the front, sides and rear (albeit the lowest parts of the sides and rear are not visible), as well as plans showing elevations, sections and floor plans of No 2, elevations of Nos 4 & 6 and floor plans of No 4. Although the plans and sections are from the 1980s, with these, along with the photographs, it should not be difficult for the appellants to create a reasonable facsimile of the exterior of the three buildings. There is some doubt as to what the interiors looked like, but these were modest Victorian cottages so they would have had a standard layout that could be inferred from the windows and what plans there are available.
 10. I agree that to construct an exact copy down to every last detail would be very difficult, but I do not think that is what is required, given a sensible reading of the notices. I think the appellants have reasonable certainty that if they built something as similar as possible to what was there originally that would satisfy the Council and not leave them open to further prosecution.
 11. A subsidiary issue was that the buildings were in state of disrepair immediately prior to their demolition. This included severe cracking and subsidence, especially of No 2 which was visibly moving away from No 4, and both flanks of the group were shored up. The appellants argue that an exact copy of the buildings would have to replicate these failings and produce buildings that were a danger to the public. In my view the appellants are taking an almost absurdly literal interpretation of the notices and have failed to consider the effect of S173(7). Following on from subsection (6) this describes the minimum requirements for a replacement building. It says “*A replacement building— (a) must comply with any requirement imposed by any enactment applicable to the construction of buildings; (b) may differ from the demolished building in any respect which, if the demolished building had been altered in that respect, would not have constituted a breach of planning control; (c) must comply with any regulations made for the purposes of this subsection (including regulations modifying paragraphs (a) and (b))*”. In essence this

means the replacement building should comply with building regulations and so should not be rebuilt containing the flaws inherent in the demolished buildings.

12. The appellants argued that they had not considered this because there was no need to go beyond the word "facsimile", which means an "exact copy". However, the use of this word does not stop the relevant sections of the Act from bearing on the replacement building, and indeed cannot do so. In my view this was a somewhat specious argument, but it did serve to clear up the issue as to exactly what the replacement buildings should look like. They would be reasonable copies of what was there before, and would be in a habitable state. In my view this nullity argument has no strength and I do not consider the notices to be nullities because of the use of the word "facsimile".

The relevant delegation

13. The second argument concerned the provision of the relevant delegation. I deal with this in more detail in the appellants' costs application, but in brief, I found the Council's argument that the relevant parts of the constitution had not been superseded by subsequent constitutions to be sufficiently compelling to mean that had I been considering this matter I would not have been able to find the notices were nullities.
14. However, I agree with the Council's main argument that this not an issue that can be considered on appeal, but must be dealt with by way of a judicial review. The starting point for such a consideration is s285(1) of the Act which states that the validity of a notice shall not be challenged other than by way of an appeal under Part VII of the Act. Part VII deals with enforcement matters and s174 sets out the grounds by which an appeal can be made. None of those grounds include questioning the Council's internal delegations or constitution. Indeed that would be a matter a planning Inspector was ill positioned to judge. Nevertheless, the courts, particularly in the case of Miller-Mead³ have somewhat widened the scope of appeals to include issues where a notice is defective on its face, such as not containing an allegation, or where the requirements are hopelessly uncertain. Again, it is not possible to tell from within the four corners of the notice whether the correct delegations are in place or not so this is not a matter for a s174 appeal.
15. Both parties quote from Beg⁴ to support their case, which suggests to me that this is not a straightforward matter. In Beg the court differentiates between a nullity and invalidity and says the issues before it in that particular case were points that could have been pursued on appeal, had one been made. But this does not sit easily with the later quote from Koumis⁵ in the Court of Appeal that matters of nullity should be restricted to issues that are apparent on the face of the notice, which refers back of course to Miller-Mead and would exclude considering an authorities' delegations. If a notice is not a nullity then the Inspector's jurisdiction is restricted to matters defined by the scope of s174, so again the issue of delegated authority is not relevant. All of this leads me to favour the Council's assertion that this issue can only be raised by way of judicial review.

³ Miller-Mead v MHLG [1963] 2 WLR 225

⁴ Beg v Luton [2017] EWHC 3434 (Admin)

⁵ Koumis v Secretary of State for Communities and Local Government [2014] EWCA (Civ) 1723; [2015] J.P.L. 682

The Appeal on Ground (a)

16. The appeal on ground (a) is that planning permission should be granted for the matters alleged in the notices, in this case the demolition of Nos 2, 4 and 6, East Ferry Road. There is no dispute that they were unlisted buildings in a conservation area and that planning permission should have been sought for their demolition, although as I noted above this was not the fault of the appellants. There is also no dispute the removal of the buildings causes less than substantial harm to the Coldharbour conservation area. The conservation area is a designated heritage asset and paragraph 193 of the NPPF makes it clear that **great weight** should be given to any less than substantial harm to the significance of a heritage asset. Paragraph 194 goes on to say that **any** loss of significance to a heritage asset should require clear and convincing justification (my emphases). Paragraph 196 explains that where there is less than substantial harm to a heritage asset is should be weighed against the likely public benefits arising from that harm.
17. The Council's argument is simple, in that there are no planning applications for any replacement buildings with the Council and they are not in discussion with any potential developers. There are, therefore, no public benefits to weigh in the balance and on a simple reading of paragraphs 193-196 the appeal must be dismissed. This is the case without even considering the policies of the local plan. However, I think this is too simplistic. There has been a history of potential and actual redevelopment in the area, and a scheme has been drawn up by the appellants to demonstrate what could happen. I shall deal with this in more detail below, but for now I note that there are possible public benefits and so for a proper consideration of this appeal I need first to consider what harm to its significance has the conservation area suffered and what, if any, public benefits are there to outweigh such harm.
18. The conservation area was designated in 1975 and consisted of the narrow strip of Coldharbour, lying between the large docks to the west and the river to the east with a small bulge to include Bridge House Quay. This area contains all the listed buildings in the conservation area. In 2008 it was extended to include a small dock leading into Blackwall Basin, the old entrance to the South Dock, and to the south, part of Manchester Road and the very end of East Ferry Road. The reason given for the extension in the conservation area appraisal document was to include Glen Terrace. This is a substantial terrace of Victorian houses standing to the west side of Manchester Road. No mention is made of the other extensions, an important point I shall consider below.
19. The East Ferry Road extension is essentially an add-on to Manchester Road and includes the modern buildings between Glen Terrace and East Ferry Road. It is drawn around Nos 2-6, which are the sole pre 20th century buildings in this section.
20. The Council's expert witness, Mr Froneman provided a detailed history and analysis of the conservation area and 2-6 East Ferry Road in particular. I have to agree with him that it would seem the extension around Nos 2-6 was deliberate; it is the reason for the extension that remains a mystery, thanks to the obvious shortcomings in the conservation area appraisal. Mr Froneman argued that Nos 2-6 were the last surviving remnant of the once large area of Victorian workers housing in Cubitt Town which occupied the whole of the south-eastern side of the Isle of Dogs. This has almost entirely been

- redeveloped following bomb damage during the war, leaving just Nos 2-6 as a historic reminder of the type of dwellings that once were common here. None of this was disputed by the appellants and I shall discuss its significance below.
21. The houses themselves, it has to be said, were not prime examples of Victorian workers cottages. Disregarding the recent dilapidation, they had very little left that was identifiably historic. It seems that Nos 4 and 6 were built in 1858-60 and then No 2 was added in 1886 on land that was formerly occupied by a tollhouse. They were originally simple two storey dwellings with a door and window on the ground floor and 2 windows upstairs facing the road. They had butterfly roofs, as was apparently common for dwellings of this type in Cubitt Town. However, prior to their demolition there was little of this original fabric left. No 6 was shown as a ruin on the 1949 map, presumably due to bomb damage, and was rebuilt some time afterwards. From the photographic evidence it seems it had modern windows inserted into what look like modern openings. No 4 is likely to have retained its original brickwork and first floor windows, but the ground floor window seems to have been a modern insertion. However, the main change to No 4 was the addition of second floor in a new gable end facing the street in 1981. This included a mock Serliano window in the centre of the gable. The façade of No 2 was entirely reconstructed in 1984 with a rusticated ground floor added with an arched window.
22. In my view they still retained the potential to be an attractive trio of buildings, but I am not convinced they can lay much of a claim to historic significance. Their attractiveness is also exaggerated as they stand next to some shabby single storey modern buildings and then a terrace of post-war, determinedly utilitarian houses. The effect of the accidental survival of the three dwellings gives the central gable an unwonted prominence that appears to be part of a planned design for the three dwellings, which is a 1980s illusion. If they were to be rebuilt then they would undoubtedly be very nice, but the issue is what role do they play in the significance of the conservation area and the answer would seem to me to be very little.
23. The significance of the conservation area itself seems to rest almost entirely on the section around Coldharbour and the historic remains of the docks. The southern extension to include Glen Terrace makes sense in order to protect this Victorian Terrace, but the further extension to East Ferry Road makes less sense. Mr Froneman made a strong effort to convince the Inquiry that this was in order to protect this last fragment of Cubitt Town but I remain unconvinced. Had the demolished buildings been of historic interest in their own right they would have been worth preserving simply for that reason, but they would still have told us little or nothing about Cubitt Town, its development, or its morphology. The development of Cubitt Town does not seem to have been unusual in any way, nor any of its buildings particularly special, it is not until this Inquiry that anyone at the Council has made any mention of it at all. To my mind the dwellings were not the last fragment of a historically significant but now lost development. They were simply three remnant buildings in a sea of modern development. To suggest that this makes it all the more important to preserve them is to adopt a collector's mentality, particularly as they seemed to have no great historic significance themselves due to the substantial modern changes they had undergone.
24. Mr Froneman made a valiant effort to suggest the demolished buildings should have been considered as non-designated heritage assets in their own right and

they could have been locally listed, had the Council sought to do so. However, the very detailed analysis in his proof, comparing them to various Historic England check lists, does tend to show the weakness of this sort of approach, a matter made clear by Dr Dogget for the appellants. Many of the positive responses depend on their importance as survivals of Cubitt Town but as I explain above I do not consider that to be of any great historic significance. Nor do I consider that the buildings are particularly historic in themselves as they have been so greatly altered.

25. Both parties accepted the loss of the buildings had caused less than substantial harm to the significance of the conservation area, and I would not like to suggest their loss causes no harm at all, but I consider that the harm is very much at the lowest end of that scale. It was argued that if the site is left vacant or redeveloped there would be no reason to retain it in the conservation area and this would seem to be true, but it does call into question the motivation for extending the conservation area in the first place. Had it been deliberately to protect this remnant of Cubitt Town, then I would have expected somewhere for this to have been explained. I accept the conservation area appraisal is lacking in detail, but if Cubitt Town was of such importance as Mr Froneman argued, then I find it hard to believe the reason for the extension to this allegedly key part of the Isle of Dogs is deliberately not mentioned as the appraisal explains only that the extension was in order to protect Glen Terrace. It seems to me more likely the Council just saw these Victorian looking buildings and took the opportunity to include them, as there was nothing else of any historic interest in the area. Whatever the truth of the matter whether or not the vacant site remains worthy of conservation area status is of little importance in this case.
26. To sum up, I do not consider the role of the demolished buildings as remnants of Cubitt Town to be any great significance and do not consider they retain any strong historic significance themselves. Their loss has thus caused less than substantial harm to the significance of the conservation area, and very much at the bottom end of that scale.

Redevelopment Potential of the Site

27. I turn now to the public benefits that might flow from the demolition. There is no dispute that East Ferry Road lies in an area that has been the subject of major redevelopment for many years and a number of large tower blocks have been granted planning permission or are being built in the immediate area. Following the court case the appellants have now assembled a substantial triangle of land on the corner of East Ferry Rd and Marsh Wall and suggest a 6 storey flatted development would be suitable, providing affordable and open market housing. The immediate context of the site is of similar types of development. On Marsh Wall, just up from the site is a 6 storey block and a much larger 48 storey tower recently granted planning permission. Directly opposite, between the site and Glen Terrace is a 3.5 storey block of flats, across from them is the large 13 storey Pierhead Lock development. There are modern housing and low rise blocks of flats on the east side of Manchester Road as it runs south, then on the corner next to the appeal site another new 6 storey block of flats. The area is thus characterised by modern flatted developments and a similar scheme on the appeal site would not be out of place.

28. The appellants showed that the Council had been in discussion with the previous owners about possible redevelopment of the site as far back as 2005 and the Council had its own Marsh Wall/East Ferry Road development proposal for a 24 storey block of flats. None of these proposals came to fruition, and this was before the conservation area was extended, but the three buildings existed on the site then, and the Council were happy at that time to see them demolished. There was a suggestion the conservation area was extended as a response to these development pressures, but there is no evidence this was the case and it seems unlikely as the Council were, at the time, in favour of complete redevelopment.
29. Although the policy framework has changed since then, Tower Hamlets remains under pressure to find 3931⁶ houses a year between 2015 and 2025. It was pointed out this is the largest annual figure for any London Borough. The Council said it had identified a 5 year supply of housing land, but could provide no more information than that, and I note its local plan is still in the "emerging" phase. The site lies in the GLA Isle of Dogs and South Poplar Draft Opportunity Area, and the subsection where it is located should provide for 8500 homes. I also note that Cubitt Town is in a "very high growth" area as defined in the Core Strategy from 2010, a notation carried forward in the emerging local plan. All of this points to this part of the Borough being suitable for high density housing projects in an area already earmarked for major housing growth in the Borough with the largest housing demand in London and I think this background is important when considering the likelihood of redevelopment proposals coming forward.
30. The site does not benefit from a site allocation in the emerging local plan and the appellants have not engaged with the local plan process. However, I cannot criticise them for this as there have obviously been ongoing concerns about the future of Angelic Interiors itself and its ownership of the land. Without wishing to prejudge any future schemes and based solely on the evidence I heard, the site would seem to be a prime location for housing development and the owners have assembled a coherent development plot, of which the site of Nos 2-6 is a part. To that end the appellants have produced the Turner scheme, which is a suggested possible redevelopment of a six storey block of flats with 22 dwellings of which 35% would be affordable. This clearly is merely indicative and has no particular standing, but does show what could be achieved on the site. The point is not whether this scheme or even one like it will definitely come forward, but whether a scheme is possible. What this demonstrates to me is that there would appear to be no constraints that would prevent a housing scheme of significantly greater density than 3 units from being successful on the site.
31. As noted above, there are no planning applications for development of the site, which is not allocated for development in the emerging local plan and the Turner scheme is only illustrative. As the appellants explained they are not developers, but would sell on the site. Any public benefits are therefore speculative and the weight to be given to them is reduced accordingly. But given the development background described above, it would seem highly likely that a suitable development proposal could be found and there are no obvious reasons why the landowner would not want to realise the development potential of the site.

⁶ Figures from London Plan (March 2016) Table 3.1 page 96

The Balancing Exercise

32. The London Plan, necessarily, is a high level document, but its policies in Chapter 7 are concerned to protect the significance of heritage assets and if possible adapt and re-use historic buildings. Policy SP10 of the Core Strategy seeks to protect the historic environment and preserve locally distinctive character. DM24 seeks to support good design and DM27 seeks to protect heritage assets and states that development within a heritage asset will only be allowed where there is no adverse impact on the heritage asset itself. The Council's case is that the less than substantial harm to the significance of the conservation area identified means the demolition was clearly contrary to the development plan, there are no countervailing benefits to weigh in the balance and so should be refused, in accordance with paragraph 11 of the NPPF. That is how I intend to approach the balancing exercise.
33. I agree with the parties that the demolition has caused less than substantial harm to the significance of the conservation area. But I do not agree the three dwellings should have the status of non-designated heritage assets, and I consider they had very little historic significance in themselves and they played only a very minor role in the significance of the conservation area. Therefore the less than substantial harm is very much at lowest possible end of the scale. Great weight should be given to any harm to the significance of a conservation area.
34. Paragraph 196 of the NPPF requires that the harm should be weighed against any public benefits. In this case those benefits are the redevelopment of the site with a much larger number of dwellings than would be the case if the demolished houses were rebuilt, including much needed affordable housing, all of which would be in accord with the prevailing policy ethos for the area. I accept these benefits are speculative, but in my view there is a good chance they would be realised. It seems likely to me that even had the buildings still been in place, given their poor condition and lack of any historic significance, they would have been demolished to make way for a comprehensive redevelopment scheme. Consequently, I consider these benefits outweigh the harm identified. The demolition of the three dwellings is thus in accord with the NPPF and the development plan for the area and so I shall grant planning permission accordingly.
35. Had my decision been more finely balanced, I would have had to consider the proportionality of the requirement to rebuild the dwellings. As is well known the enforcement system is intended to be remedial and not punitive. The only possible remedy for unlawful demolition is a complete rebuild. While I agree that it is important that the loss of historic buildings should not be seen to be condoned, in this case one has to question the need to rebuild the dwellings when they were of such low historic significance and I do not think that such a requirement would have been proportionate.

Conditions

36. Two conditions were suggested, one requiring the tidying up of the site and its landscaping. This is entirely sensible as it could be several years before a redevelopment scheme is agreed and begun and could also open up the public open space at the tip of the site which is currently hidden behind hoardings.

37. A second was that a scheme for redevelopment should be brought forward within 12 months and if not implemented in full within a further 12 to 24 months the requirements should bite and the dwellings be rebuilt. I agree with the Council that such a condition is fraught with uncertainty and potential problems if a redevelopment scheme should stall for whatever reason. However, I do not think it is necessary. As long as the site is treated as per the first suggested condition, the impact on the conservation area will be marginal at best and redevelopment can be left to the market.

Simon Hand

Inspector

APPEARANCES

FOR THE APPELLANTS:

Ned Westaway – of counsel
He called
Dr Nicholas Dogget - Heritage
David Churchill – Planning


FOR THE LOCAL PLANNING AUTHORITY:

Reuben Taylor
He called
Ignus Froneman - Heritage
Desmond Adumekwe – London Borough of Tower Hamlets

DOCUMENTS

- 1 Council's opening
- 2 Appellants' opening and background documents
- 3 Marsh Wall appeal decision letter
- 4 Conservation area appraisal guidelines
- 5 Relevant policy extracts
- 6 Appellants' arguments over the issue of delegated authority
- 7 Appellants' suggested conditions
- 8 Council's suggested conditions
- 9 Council's compliance policy
- 10 Council's closings
- 11 Appellants' closings
- 12 Council's statement concerning authorisation
- 13 Appeal decisions dealing with issue of authorisation by the Council



EQUALITY ANALYSIS QUALITY ASSURANCE CHECKLIST

<p>Name of 'proposal' and how has it been implemented (proposal can be a policy, service, function, strategy, project, procedure, restructure/savings proposal)</p>	<p>The Implementation of a New Community Infrastructure Levy (CIL) Charging Schedule</p> <p>The London Borough of Tower Hamlets is a Charging Authority for the purposes of Part 11 of the Planning Act 2008 and may therefore charge the Community Infrastructure Levy (CIL) in respect of development in Tower Hamlets.</p> <p>The proposal relates to undertaking consultations and going through the process of adopting a new Charging Schedule which will set new rates for the Council's Charging Schedule.</p> <p>Approval to consult will be sought from the Mayor in Cabinet and a subsequent approval to adopt will be referred to Full Council for approval.</p>
<p>Directorate / Service</p>	<p>Place</p>
<p>Lead Officer</p>	<p>Joseph Ward</p>
<p>Signed Off By (inc date)</p>	<p>Joseph Ward, 20/10/2017</p>
<p>Summary – to be completed at the end of completing the QA (using Appendix A) (Please provide a summary of the findings of the Quality Assurance checklist. What has happened as a result of the QA? For example, based on the QA a Full EA will be undertaken or, based on the QA a Full EA will not be undertaken as due regard to the nine protected groups is embedded in the proposal and the proposal has low relevance to equalities)</p>	<p>Example</p> <p> Proceed with implementation</p> <p>As a result of performing the QA checklist, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.</p>

Stage	Checklist Area / Question	Yes / No / Unsure	Comment (If the answer is no/unsure, please ask the question to the SPP Service Manager or nominated equality lead to clarify)
1	Overview of Proposal		
a	Are the outcomes of the proposals clear?	Yes	The proposals relate to approvals to consult on and submit for examination a new local Community Infrastructure Levy Charging Schedule which will help the Council raise funding to deliver infrastructure.
b	Is it clear who will be or is likely to be affected by what is being proposed (inc service users and staff)? Is there information about the equality profile of those affected?	Yes	The proposals will provide residents with an opportunity to comment on the Council's proposals with regards to a new CIL Charging Schedule. The equality profile of residents is available from the Census or GLA population data/projects.
2	Monitoring / Collecting Evidence / Data and Consultation		
a	Is there reliable qualitative and quantitative data to support claims made about impacts?	Yes	It is not envisaged that the new Charging Schedule will have any unequal impacts on the nine protected groups. The new Charging Schedule will be the subject of two consultations prior to adoption. This will ensure that the public have an opportunity to comment prior to adoption.
	Is there sufficient evidence of local/regional/national research that can inform the analysis?	Yes	The equality profile of residents is available from the Census or GLA population data/projects.
b	Has a reasonable attempt been made to ensure relevant knowledge and expertise (people, teams and partners) have been involved in the analysis?	Yes	The CIL rates have been formed in collaboration with other teams in the Council in a way that will have reasonably accounted for any equalities issues.
c	Is there clear evidence of consultation with stakeholders and users from groups affected by the proposal?	Yes	The proposal relates to carrying out consultations, so this will occur in due course.
3	Assessing Impact and Analysis		
a	Are there clear links between the sources of evidence (information, data etc) and the interpretation of impact amongst the nine protected characteristics?	Yes	It is not envisaged that the proposals will have any unequal impacts on the nine protected groups.
b	Is there a clear understanding of the way in which proposals applied in the same way can have unequal	Yes	It is not envisaged that the proposals will have any unequal impacts on the nine protected groups.

	impact on different groups?		
4	Mitigation and Improvement Action Plan		
a	Is there an agreed action plan?	Yes	Not required.
b	Have alternative options been explored	Yes	Not required, the alternative option would be to not adopt a new Charging Schedule.
5	Quality Assurance and Monitoring		
a	Are there arrangements in place to review or audit the implementation of the proposal?	Yes	Following the consultations, if appropriate, the proposals will be referred to Full council for approval to adopt.
b	Is it clear how the progress will be monitored to track impact across the protected characteristics??	Yes	Equalities matters will be considered in any report for adoption. If appropriate, a plan will be formed to track any impacts across protected characteristics at that time.
6	Reporting Outcomes and Action Plan		
a	Does the executive summary contain sufficient information on the key findings arising from the assessment?	Yes	Yes

Appendix A - Equality Assessment Criteria

Decision	Action	Risk
As a result of performing the QA checklist, it is evident that due regard is not evidenced in the proposal and / or a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . It is recommended that the proposal be suspended until further work or analysis is performed – via a the Full Equality Analysis template	Suspend – Further Work Required	Red: 
As a result of performing the QA checklist, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.	Proceed with implementation	Green: 

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**Community Infrastructure Levy (CIL)
Charging Schedule Explanatory Notes**

xxDatexx

1. Relief from Payment of CIL

- 1.1 The following types of development will usually be exempt from CIL and can apply for relief from the payment of the London Borough of Tower Hamlets' CIL:
- Dwellings let by registered providers of social housing, in accordance with the specific provisions of Regulation 49 of the CIL Regulations (2010) (as amended).
 - Charities where the development will be used wholly, or mainly, for charitable purposes (regulation 43 of the CIL Regulations 2010 (as amended)).
- 1.2 Under sections 55 to 58 of the CIL Regulations 2010 (as amended), the Council has the option to provide discretionary relief in 'exceptional circumstances'.

2. Payment by Instalments

- 2.1 Regulation 69b and 70 of the CIL Regulations 2010 (as amended) provides options for a Charging Authority to adopt an instalment policy, which will allow developers/liable parties to pay for the levy by instalments.
- 2.2 The Council, from the 1st January 2018 has adopted a new Instalments Policy that will apply in respect of both the London Mayor's and the Tower Hamlets Local CIL. It allows payment for developments with a CIL liability of more than £100,000 to be made in two instalments. The Council will keep this policy under review.

3. Relationship with Planning Obligations

- 3.1 The Council's Planning Obligations Supplementary Planning Document sets out the Council's approach to planning obligations. The Council has an adopted Regulation 123 List which sets out the types of infrastructure on which the Council intends to spend its CIL and therefore for which planning obligations will not be sought.

4. Monitoring and Administration

- 4.1 The London Borough of Tower Hamlets will retain 5% of CIL charges for monitoring and administrative purposes in accordance with the CIL Regulations 2010 (as amended).

5. Reporting and Review

- 5.1 Regulation 62 of the CIL Regulations 2010 (as amended) requires the Charging Authority to publish annual reports for each financial year.
- 5.2 The Council will keep the operation of the CIL and the position regarding the funding and economic viability evidence under continual review and, where necessary, will seek to renew the Charging Schedule in accordance with relevant Government guidance and legislation.

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Community Infrastructure Levy (CIL)

Regulation 123 List

September 2016

Regulation 123 List

List of Infrastructure Projects

September 2016

The list below sets out those types of infrastructure projects that Tower Hamlets Council intends will be, or may, be wholly or partly funded by CIL.

The inclusion of a type of infrastructure in this list does not signify a commitment from the Council to wholly or partly fund it through CIL.

Types of strategic* infrastructure (including new provision, replacement or improvements to existing infrastructure, operation and maintenance): -**

- **Community facilities**
- **Electricity supplies to all Council managed markets**
- **Employment and training facilities**
- **Energy and sustainability (including waste) infrastructure**
- **Flood defences**
- **Health and social care facilities**
- **Infrastructure dedicated to public safety (for example, wider CCTV coverage)**
- **Leisure facilities such as sports facilities, libraries and Idea Stores**
- **Open space, parks and tree planting**
- **Public art provision**
- **Public education facilities**
- **Roads and other transport facilities**

* For the purposes of the CIL Regulation 123 List, 'strategic' is defined as infrastructure that is designed to serve more than those residents or workers within one particular development by contributing to infrastructure improvements across the wider Borough.

** The above list excludes infrastructure required by the Council's Managing Development Document on the Wood Wharf, Westferry Printworks, Bishopsgate Goods Yard and London Dock sites.



Community Infrastructure Levy (CIL)
Payment In Kind and Infrastructure Payments
Policy

xxDatexx

1. In accordance with Regulation 73, 73A, 73B and 74 of the Community Infrastructure Levy Regulations (2010) as amended, the London Borough of Tower Hamlets Council as the Charging Authority for the area hereby gives notice that the Council is offering the payment of CIL by way of the transfer of land to the Council, or by infrastructure payments.
2. This policy is effective from the day the London Borough of Tower Hamlets CIL Charging Schedule comes into effect on 01/04/2015.
3. The CIL Regulations 2010 (as amended) allow the Council to accept full or part payment of CIL liability by way of transfer of land to the Council. The Council may also enter into agreements in writing (subject to the criteria in Regulation 73A) to receive infrastructure payments, before the chargeable development is commenced¹. The infrastructure to be provided must be related to the provision of the types of projects listed in the Council's Regulation 123 list.
4. The Council is not obliged to accept any offer of payment in kind by land or infrastructure.
5. Please see the Community Infrastructure Levy Regulations 2010 (as amended), for the full details relating to payment in kind.

¹ See Regulation 7 of the CIL Regulations (2010) as amended for "Commencement of Development".



Community Infrastructure Levy (CIL)
Supporting Evidence and Funding Gap
Report

October 2019

1. Introduction

1.1 This document has been formed to describe and summarise the infrastructure planning evidence required to support the adoption of the Council's new Charging Schedule. In particular, it will set out:

- What the Council intends to fund using its CIL;
- The matters for which the Council will continue to secure using S106 planning obligations;
- The amount of funding collected in recent years through S106 Agreements;
- The extent to which the Council has met its affordable housing target;
- The Council's funding gap, in order to justify charging a CIL, alongside a levy funding target.

2 What the Council intends to fund using CIL

2.1 The list of types of projects on which the Council intends to spend its CIL is described in the Council's new draft Regulation 123 List, attached at Appendix A.

2.2 The only substantive amendment currently proposed to the Council's Regulation 123 List is that it removes a specific reference to infrastructure required by the Council's Managing Development Document on the Wood Wharf, Westferry Printworks, Bishopsgate Goods Yard and London Dock sites being excluded from the list. Also removed is a reference to one type of project ("Electricity supplies to all Council managed markets") as this has been completed so is no longer relevant in CIL funding terms.

2.3 The Council is reconsidering the terminology used in the Regulation 123 List to improve clarity and will consult on any further amendments proposed. It is very unlikely that any amendments required will affect the viability work supporting the proposed Charging Schedule, affecting the rates proposed. The Council intends to adopt the new Regulation 123 List at the same time as the newly proposed Charging Schedule.

2.3 The proposed Charging Schedule will help the Council raise funding to deliver the projects described in the Council's Infrastructure Delivery Plan (IDP). The IDP identifies a range of projects required to support the development of the Council's area as described in the Local Plan and London Plan. The Infrastructure projects described in

the IDP will help ensure development in Tower Hamlets is sustainable.

- 2.4 The Council decides on the allocation of CIL and S106 funding through its Infrastructure Delivery Framework decision-making process. This process was referred to and approved by the Mayor in Cabinet in January and October 2016.

3 The matters for which the Council will secure S106 Planning Obligations

- 3.1 The matters for which the Council will continue to secure using S106 planning obligations are described in detail in the Council's adopted Planning Obligations Supplementary Planning Document (SPD).

- 3.2 In summary, non-financial matters (such as the provision of affordable housing) will continue to be secured using S106 Planning Obligations. The Council intends to continue to secure a few financial non-infrastructure related matters through S106, including:

- **Construction Phase Skills and Training Contribution:** This financial contribution is sought to support and provide the training and skills needs of local residents in accessing the new job opportunities in the construction of development.
- **End User Phase Skills and Training Contribution:** This financial contribution is sought to support and provide the training and skills needs of local residents in accessing the new job opportunities created by the development.
- **Carbon Offset Contribution:** Where development proposals are unable to Development Plan carbon reduction targets on-site, contributions to a carbon offsetting fund will be sought to meet the shortfall.

- 3.3 The Council may continue to secure other site-by-site matters via S106 contributions where securing them would not conflict with the Council's Regulation 123 List.

4 The amounts collected in recent years through S106 and CIL

- 4.1 The following table summarises the amounts that the Council has collected in recent years through S106 and CIL:

Table 1: Amount of CIL/S106 collected by the Council, 14/15 – 17/18

	CIL	S106
2014/15	N/A	£14,900,000
2015/16	£6,785,260	£18,600,000
2016/17	£18,338,813	£16,400,000
2017/18	£13,991,578	£26,276,924
Total	£39,115,651	£76,176,924

5 The extent to which the Council has met its affordable housing target in recent years

- 5.1 Tower Hamlets has an overarching affordable housing target of 50%, with a target for individual schemes of 35% - 50%.
- 5.2 Using information from the London Development Database, Table 2 below evidences the Council's performance against its housing target between 2012/13 and 2016/17:

Table 2: The extent to which the Council has met its housing target

	2012/13	2013/14	2014/15	2015/16	2016/17
No. of Affordable Units Delivered	262	691	730	822	1,008
% of Affordable Housing Delivered (by habitable room)	34%	34%	35.6%	41%	23.6%

- 5.3 More information in this regard can be found in the Council's Housing Delivery Strategy which is part of the Council's evidence base supporting its new draft Local Plan. When information relating to delivery in 2017/18 is available the Council will make it available as appropriate.

6 The Council's funding gap

- 6.1 Detailed information on the Council's Funding Gap is set out in chapter 2 ('Infrastructure Funding Position') of the Council's draft Infrastructure Delivery Plan supporting the Council's Regulation 19 version of its new draft Local Plan. The work in this section has been updated slightly to reflect new information on projects.

Cost of Infrastructure Described in the IDP

- 6.2 The following table describes the cost of the infrastructure projects set out in the Council's IDP.

Table 3: Costs of infrastructure projects in the Council's IDP

Infrastructure Category	Total Combined Cost of Projects	% of Total Cost	Number of Projects	Number of uncosted projects
Early Years Infrastructure	£1,047,768	0%	18	0
Primary Education Infrastructure	£123,240,000	6%	12	2
Secondary Education Infrastructure	£222,200,000	12%	9	1
Special Education Infrastructure	£15,000,000	1%	2	0
Health Facilities	£14,640,665	1%	21	8
Leisure and Sports Facilities	£550,000	0%	11	10
Idea Stores and Libraries	£38,500,000	2%	7	0
Transportation, Connectivity and Public Realm Infrastructure	£1,319,140,000	69%	72	7
Publicly Accessible Open Space	£74,910,000	4%	38	32
Employment and Enterprise Infrastructure	£40,000,000	2%	3	0
Community Centres	£2,240,000	0%	6	2
Youth Centre Facilities	£350,000	0%	2	1
Strategic Energy and Sustainability	£4,000,000	0%	2	0
Strategic Flood Defence Infrastructure	£1,600,000	0%	2	1
Council Managed Markets Infrastructure	£2,950,000	0%	5	0
Public Safety and Emergency Services Infrastructure	£31,936,000	2%	5	0
Utilities and Telecommunications Infrastructure	£4,500,000	0%	3	2
Waste Management Infrastructure	£4,000,000	0%	3	2
Total	£1,900,804,433	100%	221	68

6.3 Please note that the amount set out relating to Transportation, Connectivity and Public Realm Infrastructure includes an upgrade to the entire DLR network, costing approximately £700m. This amount cannot yet be disaggregated to establish what only applies to the Council's authority area. Note that this amount is assumed to be funded entirely by TfL's Business Plan so does not affect the Funding Gap.

6.4 There are 68 projects for which the Council does not yet have costs as these projects are not yet developed enough. The Council estimates that these projects would cost in the region of £150m - £300m to deliver although this figure depends on a number of unknown factors.

Potential Funding Sources

- 6.5 The following table summarises the Council's position with regard to the availability of funding to spend on infrastructure. Please note that the Council is not necessarily in receipt of the amounts stated, rather it reasonably expects these amounts to be available based on the information available.

Table 4: Availability of funding for infrastructure

Type of Funding	Amount Available	Source
1. Capital Grants	£792.68m	Council's Capital Programme 2017/18 – 2020/21.
2. S106 Funding: Existing account and projections up to 2028/29	£183.5m	Council's bespoke projections.
3. CIL Funding, existing and projections up to 2030/31	£292.75m	Council's bespoke Projections
Total	£1.268m	

Capital Grants

- 6.6 This funding projection was partially derived from the Council's adopted Capital Programme which sets out the Council's funding position from 2017/18 to 2020/21. The draft Isle of Dogs and South Poplar Opportunity Area Planning Framework has also identified potential funding from TfL's Business Plan and this funding is also included under this category.
- 6.7 The table below provides a breakdown of the funding sources that fall under this category:

Table 5: Capital grant funding sources

Funding Source	Amount	Notes
Schools Basic Need/ Expansion Grant	£53.85m	
Transport for London's Local Improvement Programme	£10.828m	
Transport for London's Business Plan	£728m	Assumed to be spent on DLR Improvement Programme and the Crossharbour Station project.
	£792.68m	

S106 Funding

- 6.8 S106 is payable in accordance with triggers set out in S106 agreements. The Council's S106 income will, like CIL, depend upon the timings for delivery of individual development sites. The below table provides a breakdown of these funding sources.

Table 6: S106 on account and forecasted income

Year	Annual Amount (£)
Funding on account as at 31/03/2017	£79,535,461
2017/18 (estimate)	£26,276,924
2018/19 – 2028/29 (estimate)	£77,760,019
Total	£183,572,404

CIL Funding

- 6.9 The following table sets out projected income over the period of the Council's Regulation 19 version of its new draft Local Plan, assuming both the existing and proposed rates:

Table 7: Projected CIL income

	Proposed CIL Charging Schedule	Current CIL Charging Schedule
2017/18	£13,991,578	£13,991,578
2018/19	£16,033,797.17	£16,033,797
2019/20	£13,866,385.13	£13,866,385
2020/21	£16,178,203.78	£16,178,204
2021/22	£29,390,322.70	£25,775,569
2022/23	£28,158,376.68	£24,944,980
2023/24	£27,943,086.64	£24,426,533
2024/25	£23,897,568.74	£20,742,081
2025/26	£19,713,478.01	£16,674,785
2026/27	£19,912,020.84	£16,819,327
2027/28	£19,684,062.60	£16,593,499
2028/29	£16,795,060.20	£14,317,851
2029/30	£15,572,846.86	£13,099,898
2030/31	£6,492,564.94	£5,458,111
Total	£292,753,425	£264,046,670

- 6.10 Note that income projections above assume a new Charging Schedule is adopted in 2019/20 and the applications permitted after this point start to come forward from the year 2021/22.
- 6.11 The Council has to date collected £39m in CIL funding. In accordance with table 1 above, approximately £25m of those receipts were collected in the years 2015/16 and 2016/17. The remainder was collected in the year 2017/18 to date.

Funding Gap

Aggregate Funding Gap

- 6.12 The aggregate funding gap is the total cost of infrastructure, less funding from sources other than CIL:

Table 8: Aggregate funding gap for CIL

Total cost of infrastructure	£1,900,804,433
Less	
Funding from sources other than projected CIL Income	£1,015,368,055
Equals	
Aggregate Funding Gap	£885,436,378

Residual Funding Gap

- 6.13 The residual funding gap is calculated by subtracting the projected CIL income from the aggregate funding gap:

Table 9: Residual funding gap for CIL

Aggregate Funding Gap	£885,436,378
Less	
CIL Funding Projections up to 2030/31	£292,753,425
Equals	
Residual Funding Gap	£592,682,953

- 6.14 The Council are able to demonstrate a significant residual funding gap so are able to continue to charge a local CIL, in accordance with paragraph 16 of the CIL Planning Practice Guidance.
- 6.15 The scale of growth projected in Tower Hamlets means that the vast majority of funding for infrastructure will need to come from sources other than CIL.

Levy Funding Target

- 6.16 Given the Council has a significant funding gap, the Council's funding target for CIL will represent the maximum viable amount over the Local Plan period which has been identified as £292.75m (see table 7 above).

Appendix A: The Council's Regulation 123 List



Community Infrastructure Levy (CIL)

Regulation 123 List

xxxDatexxx

Regulation 123 List

List of Infrastructure Projects

xxxDatexxx

The list below sets out those types of infrastructure projects that Tower Hamlets Council intends will be, or may, be wholly or partly funded by CIL.

The inclusion of a type of infrastructure in this list does not signify a commitment from the Council to wholly or partly fund it through CIL.

Types of strategic infrastructure (including new provision, replacement or improvements to existing infrastructure, operation and maintenance)*: -

- **Community facilities**
- **Employment and training facilities**
- **Energy and sustainability (including waste) infrastructure**
- **Flood defences**
- **Health and social care facilities**
- **Infrastructure dedicated to public safety (for example, wider CCTV coverage)**
- **Leisure facilities such as sports facilities, libraries and Idea Stores**
- **Open space, parks and tree planting**
- **Public art provision**
- **Public education facilities**
- **Roads and other transport infrastructure**

* For the purposes of the CIL Regulation 123 List, 'strategic' is defined as infrastructure that is designed to serve more than those residents or workers within one particular development by contributing to infrastructure improvements across the wider Borough.

<p>Cabinet</p> <p>27 November 2019</p>	 <p>TOWER HAMLETS</p>
<p>Report of: Ann Sutcliffe, Corporate Director, Place</p>	<p>Classification: Unrestricted</p>
<p>Scrutiny Report - Improving health, environmental quality, economic and social outcomes through Housing Open Spaces</p>	

Lead Member	Councillor Sirajul Islam, Cabinet Member for Housing
Originating Officer(s)	Abidah Kamali, Strategy and Policy Manager
Wards affected	All wards
Key Decision?	Yes
Forward Plan Notice Published	30/09/2019
Reason for Key Decision	Scrutiny recommendations - Impact on Wards
Strategic Plan Priority / Outcome	A borough that our residents are proud of and love to live in

Executive Summary

This report submits the report and recommendations of the Housing Open Spaces scrutiny review, and the action plan for implementation. The review explored a range of programmes and projects that the borough is engaged in to transform housing open spaces. It was evident that there was strong commitment to support community led change. The review looked at open space strategies and policies, management and horticulture practices, community greening and growing priorities and the benefits they bring to communities. It acknowledged good practices in the management and maintenance of open spaces, and the increasing demand for community greening and growing.

The review highlighted issues concerning a missing repository of housing open space information, issues of accessibility, ensuring a consistency of approach in implementing policy, bio diversity training for residents and horticulture staff, and the sustainability of community greening, growing projects. This report therefore makes a number of practical recommendations for the council and its partners to implement which comprises of a GIS map of open spaces, sampling accessibility of spaces, implementation of policy, delivering a balance between competing priorities, development of a good practice guide to achieve quality open spaces, a co-ordinated approach to the delivery of projects and a community greening and growing development programme for staff and residents.

Recommendations:

The Mayor in Cabinet is recommended to:

1. Consider the scrutiny report of Housing Open Spaces (to improve health, environmental quality, economic and social outcomes through Housing Open Spaces) and agree the action plan in response to the report recommendations.

1 REASONS FOR THE DECISIONS

- 1.1 The Council's constitution requires the Executive to respond to recommendations from the scrutiny sub-committees. The action plan within this report outlines the Executive response to the recommendations from the Scrutiny Review on Improving health, environmental quality, economic and social outcomes through Housing Open Spaces.

2 ALTERNATIVE OPTIONS

- 2.1 To take no action. This is not recommended as the report outlines work undertaken by Councillors and officers to identify areas of improvement. Further, the actions are strategic, measurable and attainable and a timetable for delivering the recommendations has been agreed by the Directorate and is attached in Appendix 2.

3 DETAILS OF THE REPORT

- 3.1 As part of its work programme for 2018/19, the former Housing Scrutiny Sub-committee and the Tower Hamlets Residents Panel carried out a joint scrutiny review of Housing Open Spaces to improve health, environmental quality, economic and social outcomes through Housing Open Spaces. This was Chaired by Cllr Dipa Das, Chair of Housing and Regeneration Scrutiny Sub-Committee. The Scrutiny Review took the form of three evidence gathering sessions and a fourth session to agree recommendations. All of which took place between February 2019 and May 2019.
- 3.2 Tower Hamlets is a thriving borough faced with numerous challenges. It is the fastest growing and second most densely populated local authority in the UK. It is faced with huge inequalities, deprivation and poverty. It has the 4th highest proportion of social housing stock in London and over 30,000 homes, 72 per cent of the borough's social housing stock, are managed by registered providers operating in the borough. In 2018, 79% of Tower Hamlets residents were happy with their area as a place to, this is 10 percentage points lower than the England average for less deprived areas. Publicly accessible open space in Tower Hamlets remains low (0.89 hectares per 1,000 residents - less than the borough standard of 1.2 hectares per 1,000 residents) compared to

other London boroughs; this is far below the national standard. Working with social landlords to improve open space is one of the best opportunities to improve healthy environments for residents who would most benefit.

- 3.3 Research carried by Public Health England suggests that those living in wealthier areas have greater access to green space and its benefits than those living in deprived areas. The report suggests that good quality green space for all social groups is likely to improve health outcomes, reduce health inequalities foster greater community cohesion and reduce social isolation. It stresses the vital role Local authority's play in enhancing and improving access to green spaces working with partners
- 3.4 In delivering the joint scrutiny review, members of the joint scrutiny panel agreed to review good practices and policies in housing open space management. This included identifying opportunity for partnership working, sharing of good practices, promoting an increase in community benefits, accreditations and awards, and increasing access to resources to improve the quality of housing open spaces.

Outcomes

- 3.5 The desired outcomes of the joint scrutiny review comprised of:
- Establishing good practice in the management of open spaces
 - Encouraging all social housing providers to adopt good practices in order to maximise the contribution these spaces can make to improving health and wellbeing, social, economic and environmental benefits and improvements to air quality in the borough
 - The Council working with THHF to establish a Borough wide Housing Estate Best (use of) Open Space competition.
 - Promote an increase in the number of housing open Spaces accredited by the Green Flag Awards
 - Investigate the appetite for outdoor gyms on open spaces
 - Identify funding opportunities that residents, Tenants and Residents Associations and social housing providers can bid for

Core Questions

- 3.6 To achieve the outcomes, the joint scrutiny review was underpinned by 4 key questions:

- (1) How much green space in Tower Hamlets do social housing providers' manage? (GIS Map as outcome)
- (2) What informs social housing providers' approach to managing open spaces?
- (3) How do open space strategies / policies:
 - Improve accessibility and overcome challenges including ASB?
 - Improve resident's health and wellbeing?
 - Provide economic and environmental benefits (incl. air quality)?
 - Provide community cohesion, ownership and development opportunities?
- (4) What funding and partnership opportunities are accessed / available for the use of open spaces to deliver the above benefits?

3.7 The review explored a range of programmes and projects that the borough is engaged in to transform Housing Open Spaces. It was evident that there was strong commitment for community led change. The review looked at open space strategies and policies, management and horticulture practices, community greening and growing priorities and the benefits they bring to communities. Good practices were available in the management and maintenance of open spaces, and there was an increasing demand for community greening and growing.

3.8 However, the review highlighted issues concerning a missing repository of housing open space information, issues of accessibility, ensuring a consistency of approach in implementing policy, bio diversity training for residents and horticulture staff, and the sustainability of community greening, growing projects.

3.9 The Joint Scrutiny Panel received evidence from the Council, local and pan-London organisations in setting out good practice in working with housing open spaces to green communities, and provide quality open spaces, including through new development. This included the identification of benefits to both existing and new communities and habitats and the delivery of a number of improvement projects through community engagement and participation.

3.10 The Council presented evidence of its Watts Grove development amongst others where through stakeholder engagement sites identified were being transformed to provide new homes and quality open spaces. Sites identified by the Council for housing (to support delivery of 2,000 new Council homes

(Mayoral pledge)) are often inaccessible, riddled with Anti-Social Behaviour (ASB), with formal / informal car parking, where green / play space needs enhancement. Through resident engagement the Council housebuilding programme empowers residents to be active in the design of schemes. This includes enhancing open space / green space sites through intelligent design and planting, and working with the ASB preventions officer to design out ASB. The joint panel acknowledged the Council's approach to design and stakeholder engagement and requested that the Council prioritise and encourage underutilised spaces to be co-designed and transformed to deliver a balance between competing priorities.

3.11 The joint panel agreed that in a borough with a growing population, c.19,000+ people on the housing register, existing open space deficiencies and underutilised open spaces, delivering a balance between competing priorities to achieve quality open spaces is crucial (Recommendation 2b).

3.12 This report therefore makes five recommendations for the Council and its partners to implement which comprises of a GIS map of open spaces, sampling accessibility of spaces, implementation of policy, delivering a balance between competing priorities, development of a good practice guide to quality open spaces, a co-ordinated approach to the delivery of projects and a community greening and growing development programme for staff and residents. The report with recommendations is attached at Appendix 1; the supporting action plan is attached at Appendix 2. Recommendations comprise of the following:

Policy	
R1	Drawing on intelligence, the Council produces an up to date GIS map of housing open spaces, and encourage THHF to <u>sample</u> and assess the accessibility of sites in wards with open space deficiencies identifying any improvement options.
R2a	The Council to report back to the committee on new developments and their compliance with planning policies (below): <ul style="list-style-type: none"> • Policy D.SG3: Health impact assessments • Policy D.DH8: Amenity • Policy S.SH1: Delivering high quality design • Policy D.DH2: Attractive streets, spaces and public realm • Policy S.CF1: Supporting community facilities • Policy D.ES3: Urban greening and biodiversity • Policy D.OWS3: Open space and green grid networks

	<ul style="list-style-type: none"> • Policy D.DH6: Tall buildings • Policy D.ES2: Air quality
R2b	The Council to prioritise and encourage underutilised spaces to be co-designed and transformed to deliver a balance between competing priorities.
Management and Service Improvements	
R3	<p>The Council to encourage and support THHF to develop a good practice guide to achieve quality open spaces – to deliver health, environmental quality, economic and social outcomes. Comprising of priorities to:</p> <ul style="list-style-type: none"> • Green communities, roofs and balconies and support (incl. grants, tools and revenue funding (where possible)) community growing • Improving access, encouraging usage and multiuse facilities on open spaces • Eco friendly and environmentally grounds maintenance and intelligence based planting • An online platform (webpage) for community greening, (either via THHF or by each social landlord) – including information, advice and guidance, policies, procedures, duties, health and safety, licenses and map of community growing projects established and new sites identified
Communications, Engagement and Partnership working	
R4	The Tower Hamlets Housing Forum’s Community Involvement Network supported by the Council to facilitate the delivery of projects that encourage community greening, growing and quality open spaces that deliver wide benefits.
R5	<p>The THHF Community Involvement Network to widen the scope of its ‘food growing and managing a food garden training session’ to a broader development programme to cover community greening and growing (available to both residents and staff) comprising:</p> <ul style="list-style-type: none"> • The Green flag awards for housing • Intelligence based planting, enhancing biodiversity and green recycling • Benefits of friends groups • Community greening and growing - policies, procedures, duties, health and safety, and licenses • THHF good practice guide and sharing of good practices

- | | |
|--|--|
| | <ul style="list-style-type: none">• Supporting a cottage industry and resident led social enterprises• Local employment initiatives in horticulture |
|--|--|

4 EQUALITIES IMPLICATIONS

- 4.1 The Public Sector Equality Duty (as set out in the Equality Act 2010) aims to embed equality considerations into the day to day work of public bodies, so that they tackle discrimination and inequality and contribute to making society fairer.
- 4.2 The recommendations and actions set out in this review seek to reduce inequalities including health inequalities, foster greater community cohesion, reduce social isolation and support social value, economic and environmental benefits through housing open spaces. It stresses the vital role Local authority's play in enhancing and improving access to open spaces working with partners to implement recommendations on key equality considerations.

5 OTHER STATUTORY IMPLICATIONS

- 5.1 This section of the report is used to highlight further specific statutory implications that are either not covered in the main body of the report or are required to be highlighted to ensure decision makers give them proper consideration. Examples of other implications may be:
- Best Value Implications,
 - Consultations,
 - Environmental (including air quality),
 - Risk Management,
 - Crime Reduction,
 - Safeguarding.
 - Data Protection / Privacy Impact Assessment.
- 5.2 The recommendations in scrutiny review are made as part of the joint scrutiny panels role in helping to secure continuous improvement for the Council, as required under its Best Value duty.
- 5.3 Implementation of the recommendations will deliver environmental improvements for the borough, including bio diversity enhancements.
- 5.4 There are no direct risk management implications arising from this scrutiny report and action plan.
- 5.5 There are no direct crime and disorder reduction implications arising from the report or recommendations. However it is expected that open space transformation and community greening and growing will design out anti-social behaviour.

6 COMMENTS OF THE CHIEF FINANCE OFFICER

- 6.1 There are financial implications emanating from the implementation of the five recommendations made within this report.
- 6.2 Recommendation one relating to the production of GIS maps will have a resourcing implication. It is anticipated that a post will need to be created for data collection and will require funding of £38k. This recommendation should, therefore, only be approved on the identification of additional budgetary provision. If growth is required, this will need the approval of Cabinet through the annual budget setting process.
- 6.3 Funds have been identified from within existing budgets to meet recommendation two which relates to communities driving change programmes and the council's new build programme should this recommendation be approved.
- 6.4 Recommendations three to five will be funded through the Tower Hamlets Housing Forum who are able to access external funding to provide the projects. Any additional funding would need to be met from within the HRA. These projects will not progress unless all funding is sourced in advance.

7 COMMENTS OF LEGAL SERVICES

- 7.1 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 which ensure the committee has specified powers. Consistent with that 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 and may make reports and recommendations to the Full Council or the Executive, as appropriate, in connection with the discharge of any functions. It is consistent with the Constitution and the statutory framework for the Committee to be asked to comment on the matters set out in the report. Other Scrutiny Panels may be established by the Overview and Scrutiny Panel which include the Housing Scrutiny Sub Committee.
- 7.2 The report seeks the approval of the action plan which sets out the Council's response to the recommendations of the Scrutiny Review into improving health, environmental quality, economic and social outcomes through Housing Open Spaces.
- 7.3 The recommendations in the plan are capable of being carried out within the Council's powers. The Council is able to exercise its general power of competence under section 1 of the Localism Act 2011 to implement the action plan for the benefit of the authority, its area and persons resident or present in its area.
- 7.4 The Council is required when exercising its functions to comply with the duty set out in section 149 of the Equality Act 2010, namely to have due regard to

the need to eliminate unlawful discrimination, advance equality of opportunity between those who share a protected characteristic and those who do not, and foster good relations between those who share a protected characteristic and those who do not. Paragraph 4.2 of the report refers to various actions in the review that address equality considerations.].

Linked Reports, Appendices and Background Documents

Linked Report

- NONE.

Appendices

- Appendix 1 –Housing Open Spaces Scrutiny Review - Draft Report
- Appendix 2 – Housing Open Spaces Scrutiny Review Action Plan

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

- NONE.

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APPENDIX 1

Tower Hamlets Housing and Regeneration Scrutiny Sub-Committee

**Scrutiny Review - Improving health,
environmental quality, economic and
social outcomes through Housing
Open Spaces**

Draft Scrutiny Report



September 2019

Chair's Foreword

In early 2019, the Tower Hamlets Homes Residents' Panel and the former Housing Scrutiny Sub Committee carried out a joint scrutiny review of housing open spaces, managed by social landlords.

As Chair of the Housing and Regeneration Scrutiny Sub Committee, I am pleased to present this report which explores opportunities for Tower Hamlets to improve health, environmental quality, economic and social outcomes through Housing Open Spaces.

Tower Hamlets is a thriving borough faced with numerous challenges. It is the fastest growing and second most densely populated local authority in the UK. It is faced with huge inequalities, deprivation and poverty. It has the 4th highest proportion social housing stock in London and over 30,000 homes, 72 per cent of the borough's social housing stock, are managed by registered providers operating in the borough. In 2018, 79 per cent of Tower Hamlets residents were happy with their area as a place to live, this is 10 percentage points lower than the England average for less deprived areas.

A report by Public Health England suggests that good quality green space for all social groups is likely to improve health outcomes, reduce health inequalities, foster greater community cohesion and reduce social isolation. It stresses the vital role Local Authority's play in enhancing and improving access to green spaces working with external partners. The monetary value of green space benefits is estimated at:

- Economic value per individual – £30.24 per annum
 - Wellbeing value UK adult population - £34.2 billion
 - Savings to NHS - £111 million (GP visits (excluding prescription or referrals)
- However, participation in natural environments is lowest amongst the BME communities and those with poor socio economic status.

Publicly accessible open space in Tower Hamlets remains low (0.89 hectares per 1,000 residents - less than the borough standard of 1.2 hectares per 1,000 residents) compared to other London boroughs; this is far below the national standard. Working with social landlords to improve open space is a great opportunity to improve healthy environments for residents who would most benefit.

There is wide ranging support from National and Regional Governments concerning the objective of the review. This includes a commitment to be a cleaner, greener country, with access to good quality open spaces. National Government has also committed through its social housing green paper to tackle the stigma of social housing and celebrate thriving communities. The Mayor of Tower Hamlets has committed to turn Tower Hamlets into a cleaner, greener and healthier borough where inequalities are reduced. This includes tackling poor air quality, enhancing biodiversity, delivering new homes (including 2,000 Council homes), well-designed neighbourhoods and achieving a balance between competing priorities - where people feel healthier, more independent and part of a fair, inclusive, cohesive and vibrant community.

The review explored a range of programmes and projects that the borough is engaged in to transform open spaces. It was evident that there was a strong ethos to ensure resident engagement and community led change. The review looked at open space strategies and policies, management and horticulture practices, community greening and growing priorities and the benefits they bring to communities. It was

evident that good practices were available in the management and maintenance of open spaces, and there was an increasing demand for community greening and growing.

The review highlighted issues concerning a missing repository of housing open space information, issues of accessibility, ensuring a consistency of approach in implementing policy, bio diversity training for residents and horticulture staff, and the sustainability of community greening, growing projects.

This report therefore makes a number of practical recommendations for the council and its partners to implement which comprises of a GIS map of open spaces, sampling accessibility of spaces, implementation of policy and delivery of competing priorities, development of a good practice guide to quality open spaces, a co-ordinated approach to the delivery of projects and a community greening and growing development programme for staff and residents.

I would like to thank members of the joint scrutiny panel, council officers, witnesses and participants who participated in the review.

Councillor Dipa Das
Chair of the Housing and Regeneration Scrutiny Sub-Committee

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1. Recommendations

Place Shaping – Priorities to Achieve a Quality Environment through Policy	
R1	Drawing on intelligence, the Council produces an up to date GIS map of housing open spaces, and encourage the Tower Hamlets Housing Forum to <u>sample</u> and assess the accessibility of sites in wards with open space deficiencies identifying any improvement options.
R2a	The Council to report back to the committee on new developments and their compliance with planning policies. <ul style="list-style-type: none"> • Policy D.SG3: Health impact assessments • Policy D.DH8: Amenity • Policy S.SH1: Delivering high quality design • Policy D.DH2: Attractive streets, spaces and public realm • Policy S.CF1: Supporting community facilities • Policy D.ES3: Urban greening and biodiversity • Policy D.OWS3: Open space and green grid networks • Policy D.DH6: Tall buildings • Policy D.ES2: Air quality
R2b	The Council to prioritise and encourage underutilised spaces to be co-designed and transformed to deliver a balance between competing priorities.
Greening Our Housing Estates – Management and Service Improvements	
R3	The Council to encourage and support the Tower Hamlets Housing Forum to develop a good practice guide to achieve quality open spaces – to deliver health, environmental quality, economic and social outcomes. Comprising of priorities to: <ul style="list-style-type: none"> • Green communities, roofs and balconies and support (incl. grants, tools and revenue funding (where possible)) community growing • Improving access, encouraging usage and multiuse facilities on open spaces • Eco friendly and environmentally grounds maintenance and intelligence based planting • An online platform (webpage) for community greening, (either via THHF or by each social landlord) – including information, advice and guidance, policies, procedures, duties, health and safety, licenses and map of community growing projects established and new sites identified
Healthier and Greener Communities - Communications, Engagement and Partnership working	
R4	The Tower Hamlets Housing Forum's Community Involvement Network supported by the Council to facilitate the delivery of projects that encourage community greening, growing and quality open spaces that deliver wide benefits.
R5	The THHF Community Involvement Network to widen the scope of its 'food growing and managing a food garden training session' to a broader development programme to cover community greening and growing (available to both residents and staff) comprising: <ul style="list-style-type: none"> • The Green flag awards for housing • Intelligence based planting, enhancing biodiversity and green recycling • Benefits of friends groups • Community greening and growing - policies, procedures, duties, health and safety, and licenses • THHF good practice guide and sharing of good practices • Supporting a cottage industry and resident led social enterprises • Local employment initiatives in horticulture

2. Introduction

- 2.1 In March 2019, the former Housing Scrutiny Sub Committee and the Tower Hamlets Homes Residents' Panel delivered a joint scrutiny review of Housing Open Spaces - those managed by Private and Local Authority Registered Providers (social landlords). The objective of the scrutiny review was to explore ways to 'Improve health, environmental quality, economic and social outcomes through Housing Open Spaces'. The review was delivered in the context of an increasing population, growing needs and challenges including housing. Tower Hamlets is a densely populated borough, blighted by deprivation, inequalities and poor air quality.
- 2.2 Research carried by Public Health England suggests that those living in wealthier areas have greater access to green space and its benefits than those living in deprived areas. The report suggests that good quality green space for all social groups is likely to improve health outcomes, reduce health inequalities foster greater community cohesion and reduced social isolation. It stresses the vital role Local authority's play in enhancing and improving access to green spaces working with external partners.
- 2.3 Faculty of Public Health, 2010 has also concluded that:
- Contact with safe, green spaces reduce health inequalities
 - increases community activity and residents' satisfaction
 - Responds to climate change - heatwaves, flooding and CO2 emissions, improves air and noise quality, enhances biodiversity and
 - Encourages active transport
- 2.4 Research carried out by the City of London estimates that green spaces support a more sustainable environment, improves wellbeing, provides economic value (including £111million saving to the National Health Service (NHS)) and supports a stronger society. However, participation in natural environments is lowest amongst the BME communities and those with poor socio economic status.
- 2.5 There is commitment from Government, the Mayor of London and the Mayor of Tower Hamlets to achieve a greener outcome. This includes greening towns and cities (with the very best parks, trees and wildlife), improving health, wellbeing and the quality of life and supporting business growth and tourism through green / open spaces. The Mayor of Tower Hamlets has committed to turn Tower Hamlets into a cleaner, greener and healthier borough where inequalities are reduced. This includes tackling poor air quality, enhancing bio diversity, delivering new homes (including 2,000 Council homes) and well-designed neighbourhoods - where people feel healthier, more independent and part of a fair, inclusive, cohesive and vibrant community.
- 2.6 In delivering the joint scrutiny review, members of the committee agreed to review good practices and policies in housing open space management. This included identifying opportunities for partnership working, sharing of good practices, promoting an increase in community benefits, accreditations and awards, and increasing access to resources to improve the quality of housing open spaces.

Outcomes

- 2.7 The aspirations underpinning the joint scrutiny review included a desire to:
- Establish good practice in the management of open spaces
 - Encourage all social housing providers to adopt good practices in order to maximise the contribution these spaces can make to improving health and wellbeing, social, economic and environmental benefits and improvements to air quality in the borough
 - Promote collaboration between the Council and the Tower Hamlets Housing Forum (THHF) to establish a Borough wide Housing Estate Best (use of) Open Space competition.
 - Achieve an increase in the number of housing open Spaces accredited by the Green Flag Awards
 - Investigate the appetite for outdoor gyms on housing open spaces
 - Identify funding opportunities that residents, Tenants and Residents Associations and social housing providers can bid for

Core Questions

- 2.8 To achieve the outcomes, the joint scrutiny review was underpinned by 4 key questions:
- (1) How much open space in Tower Hamlets do social housing providers' manage? (GIS Map as outcome)
 - (2) What informs social housing providers' approach to managing open spaces?
 - (3) How do open space strategies / polices:
 - Improve accessibility and overcome challenges including ASB?
 - Improve resident's health and wellbeing?
 - Provide economic and environmental benefits (incl. air quality)?
 - Provide community cohesion, ownership and development opportunities?
 - (4) What funding and partnership opportunities are accessed / available for the use of open spaces to deliver the above benefits?

Review Approach

2.9 The joint scrutiny review took place between February 2019 and May 2019. The review comprised of three evidence collection sessions, a site visit and fourth session to agree recommendations. The joint scrutiny review was chaired by Councillor Dipa Das, Chair of the Housing and Regeneration Scrutiny Sub-Committee and supported by Anne Ambrose, Scrutiny Member – Resident Co-optee. The review was supported by Abidah Kamali, Strategy and Policy Manager, Tower Hamlets Council and the THH Resident Feedback Team.

2.10 Table 1 summarises the objectives of each session:

Session (S)	Agenda / Objectives
S1: 19 February 2019 - Introduction to the review & external presentations	<ul style="list-style-type: none"> • <u>Setting the scene</u> - Background, open space priorities and benefits • <u>Good practices in urban open space management</u> • How localised empowerment around open spaces can achieve better public spaces and improved health, environmental quality, economic and social outcomes?
S2: 12 March 2019 – Open space	<ul style="list-style-type: none"> • <u>Open space strategies / plans / policies</u>, bio-diversity and air

priorities and management	<p>quality action plans and <u>their work with social housing providers</u></p> <ul style="list-style-type: none"> • Public Health – tackling health inequalities and promoting wellbeing through open spaces • Landlord <u>approaches to managing open spaces</u> on estates and its relationship with delivering health and wellbeing, cohesion, environmental quality and economic benefits • Funding opportunities and improved partnership/collaborative working
S3: 23 March 2019 - Open space and community greening projects	<ul style="list-style-type: none"> • Presentations from <u>growing projects, organisations and friends group(s)</u> - Work done around fruit/veg growing projects, community ownership / community led green space/horticultural projects • Ensuring project sustainability
S4: 7 May 2019 - Recommendations and action plan	<ul style="list-style-type: none"> • Draft recommendations and action plan agreed

2.11 Members of the Housing Scrutiny Sub Committee that participated in the scrutiny review:

Councillor Dipa Das	Chair of Housing Scrutiny Sub-Committee
Councillor Dan Tomlinson	Vice Chair, Housing Scrutiny Sub-Committee Member
Councillor Shah Shuhel Ameen	Housing Scrutiny Sub-Committee Member
Councillor Shad Uddin Choudhury	Housing Scrutiny Sub-Committee Member
Councillor Gabriela Salva - Macallan	Housing Scrutiny Sub-Committee Member (appointed to committee in April 2019, attended session 4 only)
Anne Ambrose	Housing Scrutiny, Tenant Co-optee
Moshin Hamim	Housing Scrutiny, Leaseholder Co-optee

2.12 Members of the Tower Hamlets Residents Panel that participated in the joint scrutiny review:

Simon Hart	THH Residents' Panel Member
Daniele Larmarce	THH Residents' Panel Member
Samira Johnson	THH Residents' Panel Member

2.13 Other Councillors that participated in the scrutiny review:

Councillor Sirajul Islam	Statutory Deputy Mayor and Cabinet Member for Housing
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2.14 Officers that participated in the scrutiny review:

Tower Hamlets Council

Mark Baigent	Interim Divisional Director, Housing and Regeneration
Abidah Kamali	Strategy and Policy Manager
Jane Abraham	Interim Head of Capital Delivery
Yasmin Ali	Project Director – Town Hall
John Archer	Biodiversity Officer
Nicholas Marks	Air Quality Officer
Alice Bigelow	Interim Parks Manager
Matthew Twohig	Green Team Coordinator

Abigail Knight	Associate Director of Public Health
Philip Wadsworth	Strategic Planning – Local Plan Place Team Leader (Leaver)

Tower Hamlets Housing Forum

Gulam Hussain	Scrutiny and Resident Feedback Manager, THH
Mas Momin	Resident Feedback Officer, THH
Nicholas Spenceley	Head of Environmental Services, THH
Matus Holecko	Area Manager, Environmental Service, THH
Leona Menville	Chair of Public Realm Sub Group
Ana Mae Contreras-Ramirez	CaN Area Coordinator, Poplar HARCA
Paul Wilson	Community Engagement Manager, East End Homes

2.15 Other Residents / Organisations that participated in the review:

Gregory Cohn	Director, Seeds for Growth
Klaudija Alasauskaite	Development Manager, Trees for Cities
Jess Massucco	Community Education and Volunteer Manager, Trees for Cities
Fiona Brenner	Area Manager, Groundwork
Kenneth Greenway	Park Manager, Friends of Tower Hamlets Cemetery Park
Terry Lyle	Trustee, Friends of Tower Hamlets Cemetery Park
Richard Desmond	Chair, Victoria Park Friends
Joanna Milewska	Friends of Meath Gardens
Julia Miller	Friends of Meath Gardens
Tunde Morakinyo	Friends of Meath Gardens
Nathan Oley	Secretary, Approach Gardens
Margaret Wilson	Approach Gardens
Maddy Evans	Women's Environmental Network
Margaret Cox	Chair of Teesdale & Hollybush Tenants and Residents Association

3. Defining Housing Open Spaces

- 3.1 Open space is defined as any open piece of **land that is undeveloped** (has no buildings or other built structures) and can include **Green space** (land that is partly or completely covered with grass, trees, shrubs, or other vegetation) set apart for recreational or aesthetic purposes.¹
- 3.2 The New Tower Hamlets Local Plan defines Open Space as “...all land that offers opportunity for play, recreation and sport or is of amenity value, whether in public or private ownership, and where public access is unrestricted, partially-restricted or restricted”.²
- 3.3 For the purposes of the scrutiny review, only Open Spaces that are managed by Private Registered Providers and Tower Hamlets Homes, the Council’s Arm’s Length Management Organisation were included. This includes ‘amenity green space – including informal recreation spaces, and communal green spaces in and around housing’³. Private gardens were not included in the scope of this review.

4. National and Regional Context

- 4.1 According to the English Housing Survey 2017/18, in England:
- 17% (4 million) of households live in the social rented sector
 - 1.6 million households rent from Local Authorities and 2.4million rent from housing associations
 - 4% of those in the most deprived areas live in high rise flats, compared with less than 1% of those in the least deprived areas
 - Households with a black, Asian or minority ethnic household reference person were more likely to live in a high rise flat
 - 54% had a disability or long-term illness, 8% were living in overcrowded accommodation, the highest level recorded since 1995-96 and 72% were in the lowest two income quintiles.
 - The average life satisfaction score was higher for owner occupiers (8.0), than the average for private (7.4) and social (7.2) renters.
 - People in the most deprived areas were less likely to say that they were satisfied with their area as a place to live (72% compared with 89% of those in less deprived areas).⁴ In 2018, 79% of Tower Hamlets residents were happy with their area as a place to, this is 10 percentage points lower than the England average for less deprived areas.
- 4.2 There is wide ranging support from National and Regional Government concerning the objective of the review to ‘Improve health, environmental quality, economic and social outcomes through Housing Open Spaces’. This is evidenced through commitments and guidance in plans and policies, some of which have been outlined below. The Ministry of Housing, Communities and Local Government has also committed through its social housing green paper to tackle the stigma of social housing and celebrate thriving

¹ EPA New England, What is Open Space / Green Space

² New Local Plan, 2031, Tower Hamlets

³

⁴ English Housing Survey 2017/18

communities. This therefore places further emphasis on the need to support local improvements, through scrutiny.

- 4.3 The Government in its 25 year Environmental Plan commits the UK to being a cleaner, greener country. The intended outcome of the plan is to build a stronger economy and improve health and wellbeing. It explains that by connecting more people with the environment, using land more sustainably, and by planting trees and creating new habitats for wildlife, we can improve and enhance biodiversity and promote greater well-being.
- 4.4 The plan commits to creating or restoring 500,000 hectares of wildlife-rich habitat, and supporting high quality, accessible, natural spaces close to where people live and work, particularly in urban areas. This forms part of its broader objective to halt biodiversity loss by 2020. The plan also aims to encourage more people to spend time in them to benefit their health and wellbeing, and focuses on increased action from all sectors of society to improve the environment.⁵ In London, the Biodiversity Action Plan is reinforced through the London Environment Strategy which sets targets for creation of new species-rich woodland, flower-rich grassland and reed beds by 2025 and 2050.
- 4.5 In achieving sustainable development, the National Planning Policy Framework.⁶ (NPPF) comprises of 3 objectives, economic, social and environmental.

Economic	To help build a strong, responsive and competitive economy, land suitability to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure
Social	Homes to meet the needs of present and future generations; well-designed and safe built environment, with accessible services and open spaces that support new and existing communities' health, social and cultural well-being
Environmental	Making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution. These objectives are legislated through the Town and Planning Act 1990

- 4.6 In Policy 7.18 of the London Plan, the Mayor of London (MoL) supports the creation of new open space to ensure satisfactory levels of local provision to address areas of deficiency. The policy guides restrictions on the loss of protected open spaces unless equivalent or better quality provision is made within the local catchment area.⁷
- 4.7 In his Environment Strategy 2018, the MoL acknowledges that 'access to good quality green space and living in greener neighbourhoods can have a big impact on people's health and quality of life, and on how attractive a place

⁵ Department for Environment, Food and Rural Affairs and The Rt Hon Michael Gove MP 'A Green Future: Our 25 Year Plan to Improve the Environment', sets out what we will do to improve the environment, within a generation. May 2019

⁶ The revised National Planning Policy Framework, 2019

⁷ London Plan Chapter Seven: London's Living Spaces and Places Policy 7.18 Protecting open space and addressing deficiency

London is to live, visit and do business'. He further acknowledges the benefits of:

- Green roofs and walls – to improve air quality, biodiversity and insulation, reduce energy usage and flood risk
 - Green spaces - support biodiversity, improve health and well-being, by providing tranquil places to relax in, and places to play, exercise, and socialise in
- 4.8 According to Greenspace information for Greater London (GiGL), roughly 47% of Greater London is 'green'; 33% of London is natural habitats within open space and an additional 14% is estimated to be vegetated private, domestic garden land.⁸
- 4.9 The MoL aspires to making the London the world's first National Park City, where more than half of the city's area is green in 2050. In supporting this he has created a £12 million Greener City Fund. The fund comprises of community greening grants, green infrastructure projects, new woodland and community engagement projects.
- 4.10 The City of London identifies that green spaces support a more sustainable environment, which improves physical health, mental health and well-being, provides economic value and supports a stronger society. Monetary value of green space benefits is estimated at:
- Economic value per individual – £30.24 per annum
 - Wellbeing value UK adult population - £34.2 billion
 - Savings to NHS - £111 million (GP visits (excluding prescription or referrals)
- However, participation in natural environments is lowest amongst the BME communities and those with poor socio economic status.
- 4.11 Green Gyms run by conservation volunteers, this programme combines physical activity with reclaiming green space. Cost effective at £4K per QALY, returning £2.55 for every £1 spent by preventing physical inactivity related illness.
- 4.12 Under the Housing and Regeneration Act 2008, Private Registered Providers and Local Authority Landlords are regulated by the Regulator for Social Housing. The focus of the regulatory activity is on governance, financial viability and value for money, rent standards together with the setting of consumer standards. Whilst Private Registered providers are not accountable to the Council, Tower Hamlets has established effective partnership working arrangements through the Tower Hamlets Housing Forum (THHF). This forum is a partnership between housing associations (private registered providers) and Tower Hamlets Council. The objective of which is to deliver the borough's housing vision, continuously improving services including through effective inter-agency working and sharing good practice.

5. Local Context

- 5.1 Tower Hamlets is a thriving borough faced with numerous challenges:
- It is the fastest growing and second most densely populated local authority in the UK.

⁸ Greenspace information for Greater London CIC

- It is the 10th most deprived in England, and has the highest levels of child poverty in UK.
- It has the 4th highest youngest population in the UK, and around 66% of residents are from BAME communities.
- Average life expectancy for men and women are lower than national averages.
- The rate of early death is 97.6 per 100,000 compared to an England average of 73.5.
- 1 in 6 residents describe their health as 'fair', 'bad' or 'very bad' (higher than London). Older residents are amongst the loneliest in England.
- Overall education attainment levels are below London and 25% of residents are economically inactive.
- Tower Hamlets has the 4th highest proportion social housing stock in London and over 30,000 homes, 72 per cent of the borough's social housing stock, are managed by registered providers operating in the borough.⁹

5.2 The 2018 Annual Public Health reported:

- Every 10% increase in exposure to green space translates to a reduction of 5 years of expected health problems
- Adults with a wide range of green spaces around their home report 37% lower hospitalisation rates and 16% lower self-reported rates of heart disease and stroke
- Greater proportions of green space close to home are related to higher reported levels of health and mental health for all ages and socio-economic groups
- The risk of diabetes is consistently lower in greener areas; the risk is significantly lower in areas with 40% or more green land use
- There are lower rates of disease among people living within 1 kilometre of more green space; there is an even stronger relationship among people with anxiety and depression, children and more deprived communities
- There is strong evidence that increased access to green spaces, and leisure facilities, is linked to physical activity¹⁰

5.3 In a Borough of 7.633 square miles, in June 2017, the Borough's population was 308,000. By 2014 the Borough's population is expected to reach 365,200. Tower Hamlets has a housing target to deliver over 54,000 homes by 2031. The Council has c.19,000 households on its housing register, a large proportion of which live in overcrowded accommodation.

5.4 Around 78% of Open Spaces are publically accessible to residents. 13 wards are expected to experience open space deficiencies by 2031. The borough is unfortunately the 3rd highest emitter of CO2 emissions and has amongst the poorest air quality environments in London. Children in Tower Hamlets have up to 10% less lung capacity than the national average because of air pollution.

5.5 Since 2010, the Council has had its core funding from Government reduced by £148million. The Council has saved an additional £38million through efficiency savings. With pressures on much needed services rising, over the next three years, the Council will have to save a further £44m.

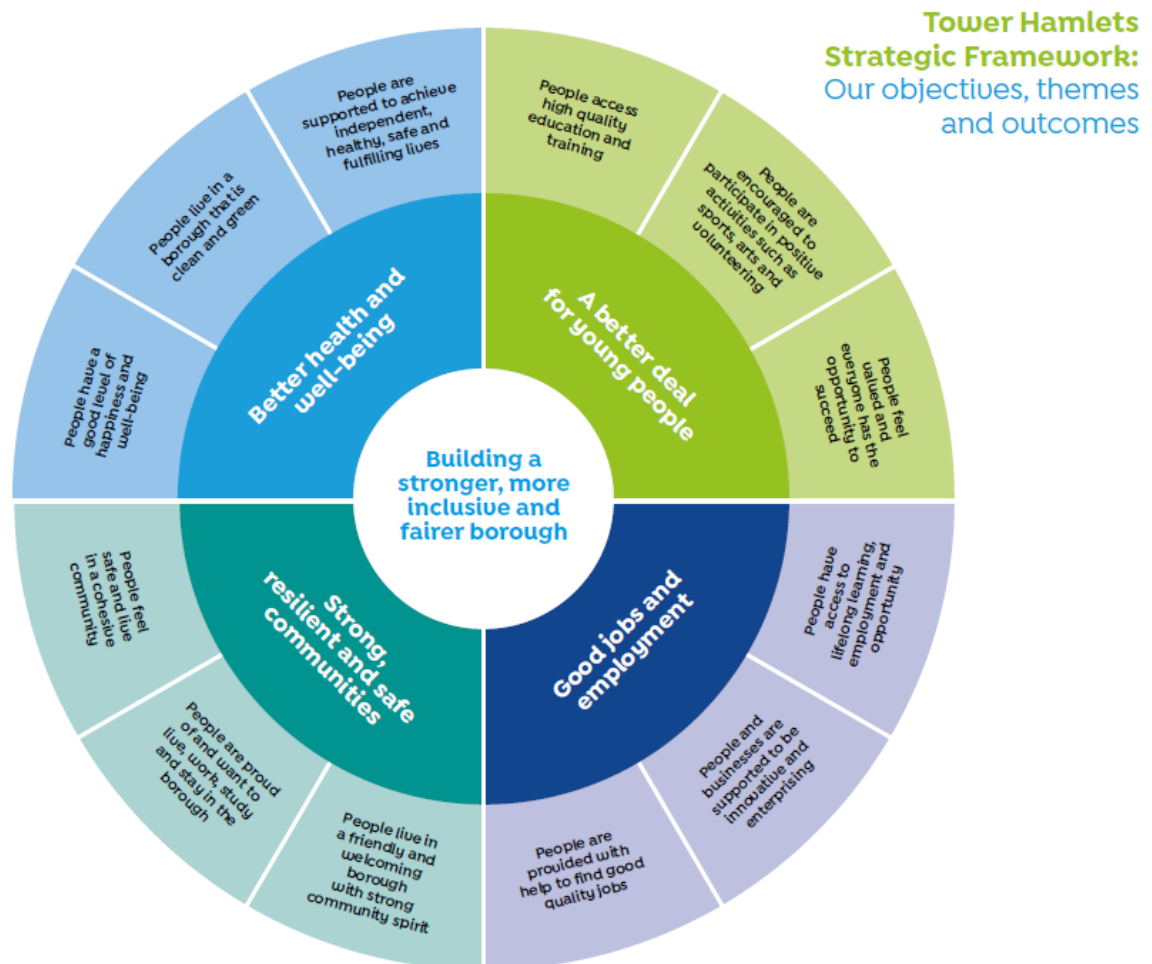
⁹ Tower Hamlets Borough Profile 2018 wards

¹⁰ Tower Hamlets Public Health Presentation, 12 March 2019

5.6 The New Local Plan 2031 Strategic Policy DH1: Good Design, Local Character and Historic Environment, places a requirement to ensure all development is designed to the highest quality standards....ensuring that developments are supported by a range and mix of high-quality, publically accessible green spaces that promote bio diversity, health and well-being. Policies seek to:

- Ensure that development does not result in net loss of open space and opportunities for the creation of new and enhancement of existing publicly accessible open spaces are maximised
- Promote innovative approaches to delivering new open spaces as well as locating parks in areas of the borough where accessibility to public open spaces is poor

5.7 There is huge commitment through local and partnership strategies and plans to support the objective of the review. Bringing this together is the Tower Hamlets Plan 2018-2023. Led by the Tower Hamlets Partnership, the key objective of the plan is to build a stronger, more inclusive and fairer borough. Through a golden thread of strategic, plans and commitments, the Council and its partners further support the objective of the review.



5.8 The Council's vision delivered through its Strategic Plan 2019-2022 is to 'work together with the community for a fairer, cleaner and safer borough', to tackle inequalities, provide a safe, clean and green borough for people live in, with affordable homes and well-designed neighbourhoods.

- 5.9 With a growing population the Parks and Open Spaces Strategy 2017-2022 highlights the importance of managing the impact of growth on open spaces whilst addressing competing demand. Through protecting, enhancing, creating new publically accessible open spaces and connecting through new green corridors in supporting Green Grid priorities.
- 5.10 The Council's Local Bio Diversity Action plan sets out what the Council, registered housing providers, developers, community groups and residents can do to help conserve and enhance the important habitats and species in Tower Hamlets. The Air Quality action plan proposes encouraging new technologies and planting systems which can tackle air quality.
- 5.11 The strategies and plans mentioned all support the objectives of the review. In addition, the objectives of the review also support the vision of the Health and Well-Being Strategy 2017- 2020 which is to make a difference to the mental health and wellbeing of everyone who lives and works in Tower Hamlets.
- 5.12 In his 2018 manifesto, the Mayor of Tower Hamlets committed to improving residents' health and air quality in Tower Hamlets, to tackle poverty, inequality and the Borough's housing crisis. Delivering commitments through:
- £332m to start delivery of 2,000 new council homes by 2022, including larger family sized properties and new homes for residents with disabilities and temporary accommodation
 - Promoting well-being, mental health awareness and tackling the growing problem of loneliness
 - Breathe Clean campaign and infrastructure facilities, to support walking, cycling, play streets away from traffic
 - Greening Tower Hamlets, investing in parks and open spaces and delivering public realm improvements

6. Findings

Place Shaping: Priorities to achieve environmental quality through policy

Health and Housing

- 6.1 The Tower Hamlets Health and Housing JSNA found access to good quality green space to be one of the top three priorities for environmental conditions. Additional research recognises that working with social landlords to improve open space is one of the best opportunities to improve healthy environments for residents who would most benefit:
- Living in areas with green spaces is associated with significantly less income-related health inequality
 - Green space has been linked with reduced levels of childhood obesity. However, children in deprived areas are nine times less likely to have access to green space and places to play
 - The closer someone lives to urban green space, the more likely they are to use it and the less likely they are to be obese or overweight
 - The optimal distance to green space is less than 0.5km from home or under 5 minutes walking distance. Ease of accessibility is also a factor¹¹

Local Policy - Planning

- 6.2 The benefits of open / green spaces are widely recognised both nationally and internationally and housing open spaces play a vital role in the delivery of these benefits. Green spaces should be accessible to as many people as possible and people are more likely to visit green space if they do not have to travel far to each it¹².
- 6.3 In order to meet the Borough's future growth needs, 220 hectares of additional publicly accessible open space will be required by 2031. Publicly accessible open space remains low (0.89 hectares per 1,000 residents - less than the borough standard of 1.2 hectares per 1,000 residents). Compared to other London boroughs; this is far below the national standard. Housing developments (i.e. over 100 units) will need to provide publicly accessible open space on site (based on the standard of 1.2 hectares per 1000 residents). Where this is not possible, a contribution will be sought towards the delivery of the projects set out in our open space and green grid strategies.
- 6.4 The panel was presented with a number of policy requirements relating to the provision and delivery of open space within the Local Plan. Publicly accessible open space should include soft landscaping and sustainable drainage systems; be of high quality design; be well-connected to other spaces; enhance biodiversity; meet the demands arising from the development; and be visible and accessible from the surrounding public realm. Communal amenity areas (as distinct from public open space and child play space) must also be provided as part of the mix of open space typologies within residential schemes.

¹¹ Presentation by Public Health, 23 March 2019

¹² University of Leeds, A brief guide to the benefits of urban green space <https://leaf.leeds.ac.uk/a-brief-guide-to-the-benefits-of-urban-green-spaces/>

- 6.5 In achieving high quality design, greening the urban environment and in maintaining housing standards and quality, planning policies place a requirement for open spaces to function as places for social gatherings and recreation, enhance bio diversity e.g. green roofs, planters etc), protect and increase the provision of trees (e.g. native species and street trees) and replace any lost.
- 6.6 The panel received case study examples of two non-council housing developments where below policy standard practices were evident in scheme delivery. This included where, public open space had been converted into hardstanding car park with no greenery, plant beds tarmacked due to inadequate maintenance arrangements, no communal amenity space, lack of connectivity to existing areas, and a tall building over shadowing children's play space. The panel agreed that the council should report back to the committee on new developments and their compliance with planning policies (below), ensuring the development of measures to do so.

Local Policy – Improving Air Quality

- 6.7 Poor air quality is a particular issue in Tower Hamlets. It is forecast that 15% of the population in the Borough (just over 10,000 people) will be exposed to pollution levels over National Objective levels as defined in the UK Air Quality Strategy. This places Tower Hamlets as the second highest London borough with high levels of exposure to pollution. Green spaces can play an important part in reducing air pollution, however there needs to be a significant amount of green space to make an appreciable difference to air quality. The Office for National Statistics has undertaken a study showing the impact of vegetation in removing air pollution. Vegetation saved £11.29 per person in Healthcare costs in Tower Hamlets and removed up to 779kg of pollution per sq km. However, the average health saving due to vegetation in the UK is £15.53 per person. This is a reflection of the low level of green spaces in the borough.
- 6.8 The Council's Air Quality Action Plan, adopted in 2017, has specific actions which are related to green spaces. These are:
- Action 27 Ensuring adequate, appropriate, and well located green space and infrastructure, including for walking and cycling
 - Action 54 Green Infrastructure, such as green walls, green screens or living roofs at schools/residential developments in polluted areas.
- 6.9 The panel raised concerns about accessibility to Mayor's Air quality fund, requesting a strengthening of publicity to ensure to information is available and accessible to all.

Bio Diversity

- 6.10 The Council has a duty under Section 40 of the Natural Environment & Rural, Communities Act 2006 to have regard to the conservation of biodiversity in the undertaking of its functions. There is clear evidence that contact with nature is beneficial to physical and mental wellbeing. Biodiversity also provides economic and functional benefits, such as pollination, flood risk reduction, air pollution reduction and local climate amelioration. These functional benefits will become increasingly important as climate change leads to more frequent extreme weather events.

- 6.11 Housing open space forms a high proportion of green space in Tower Hamlets. Much of it is currently underused and visually dull, consisting of close-mown grass with a few trees. A more biodiverse open space, with an arrangement of different vegetation including trees, shrubs and colourful flowers, is generally going to be a more visually attractive and interesting open space for the people who use or overlook it. The Local Biodiversity Action Plan is a partnership document, overseen by a steering group involving a range of stakeholders including social housing providers. Social housing providers in the borough have undertaken a wide range of biodiversity enhancement projects on their open spaces over the last few years. Many of these projects are instigated and/or led by residents, through Tenants & Residents Associations and/or community garden groups.
- 6.12 Enhancing biodiversity complements other uses of housing open space, particularly food-growing. For example, providing nectar-rich flowers to encourage bees and other pollinating insects ensures that food crops are pollinated, and providing habitat for birds and a diverse community of invertebrates reduces pests through increasing predation of plant-eating insects.

Welcoming and accessible spaces

- 6.13 The Joint Scrutiny Panel received evidence from the Council, local and pan-London organisations in setting out good practice in working with housing open spaces to green communities, and provide quality open spaces, including through new development. This included the identification of benefits to both existing and new communities and habitats and the delivery of a number of improvement projects through community engagement and participation.
- 6.14 In a borough with a growing population, c.19,000 people on the housing register, existing open space deficiencies and underutilised open spaces, delivering a balance between competing priorities to achieve quality open spaces is crucial. In tackling Borough's housing crisis, the Mayor of Tower Hamlets has pledged to start delivery of 2,000 new council homes by 2022, and deliver well-designed neighbourhoods.
- 6.15 The Council presented evidence of its Watts Grove development amongst others where through stakeholder engagement sites identified were being transformed to provide new homes and quality open spaces. Watts Grove (former Veolia waste site) was recently recognised by the New London Architecture (NLA) as a leading example of public housing in London. It provides 148 affordable homes, a large central courtyard space. The site enhances movement routes, offers amenity space to residents and encourages interaction and cohesion.¹³ Sites identified by the Council for housing are often inaccessible, riddled with Anti-Social Behaviour (ASB), with formal / informal car parking, where green / play space needs enhancement. Through resident engagement the Council housebuilding programme empowers residents to be active in the design of schemes. This includes enhancing open space / green space sites through intelligent design and planting, and working with the ASB preventions officer to design out ASB.

¹³ <https://www.bptw.co.uk/projects/watts-grove/>

- 6.16 A housing open space survey of social landlords, with a response rate of 71% found that open space records were often not centrally located, and maps sometimes pre-dated housing stock transfers. Open spaces managed by landlords included fencing for child safety (incl. play areas), restricted opening hours or restricted access to certain groups (community / growing) and closures either temporary or permanent due to health and safety or ASB. 40% reported potential areas that could be transformed into green spaces. Some were under consideration, whilst others were hindered by limited resources. Neighbourhood satisfaction data ranged from 67% - 78% (data provided by 40% of landlords) with higher results visible for horticulture services that were delivered in-house. The landlord with the lowest neighbourhood satisfaction result (67%) reported that it would bring horticulture services in-house. This landlord would also commence work with the Natural Science Research Council to develop a toolkit to enable positive ecological site management and resident well-being.
- 6.17 Friends of Tower Hamlets Cemetery Park (FoTHCP) provided evidence on challenges faced with housing open spaces. FoTHCP provided advice on effective management to provide long lasting benefits to the environment. It highlighted a number of challenges relating to social housing green spaces, concerning access in particular. Where some green spaces have limited times of access due to concerns around ASB, others provide visual access only with opportunity to enhance, or are technically available but uninviting, are restricted to residents or a subset of residents.

Community led change

- 6.18 Evidence was heard from Groundwork London on how the organisation, through green spaces, improves the employability skills of those furthest away from the labour market. This includes working with communities to make their surroundings greener, healthier and safer, educating communities on environmental impact and saving natural resources. The organisation provided examples of community led design and change to climate proof social housing landscapes, delivering a social return of £4.29 for every £1 spent. This includes housing estate improvement projects, which through community engagement and design, and Council and housing association support and funding, helped to deliver change. The organisation has committed £429,000 into current projects in Tower Hamlets, £101,000 of which is in housing estates.
- 6.19 Trees for Cities were called to provide evidence on the benefits of trees in an urban environment. It provided evidence of estate tree planting projects and greening benefits. Whilst the benefits were similar to those already mentioned, the organisation highlighted that urban trees helped create a sense of place and local identity, tackle crime and increase pride in the area. Urban trees can play an important role in reducing the urban heat island effect, remove dust and particulates from the air, provide food and shelter for wildlife and reduce traffic noise. One tree can remove 26 pounds of carbon dioxide from the atmosphere annually, equalling 11,000 miles of car emissions.¹⁴ The importance of ensuring a planned programme of planting was emphasised, particularly as the tree planting seasons are short (October – April).

¹⁴ Environmental factsheet, Project Evergreen <https://projectevergreen.org/wp-content/uploads/2013/07/EnvironmentalBenefitsofGreenSpace.pdf>

- 6.20 The panel raised concerns about the national approach to funding short term greening projects. Whilst they agreed that such projects provided community and environmental benefits, these projects were often not supported by an exit strategy and sustainability plan. The importance of short term capital projects being supported by ongoing revenue funds and effective maintenance by landlords was highlighted. Poor maintenance of green spaces can quickly disengage residents from using them. The panel was informed that sustainability of projects was rising on the national agenda through longer term projects. Where previous funding was mainly short term capital funds, the MoL through his Greener City Fund, committed to 3 years funding. The panel was informed that due to the range of benefits provided including health, employment etc, access to different pots of funding could also be accessed. Engagement of friends groups and educating residents was also recognised as good practice.
- 6.21 The panel agreed with the approach of community engagement and participation over consulting. It raised the importance of ensuring resident engagement in the development of Landscaping Strategies. This would combine local input with professional advice and support the survival of new and transformed housing open space, through achieving buy in, legacy and long term sustainability.
- 6.22 Garden projects can provide opportunities for growing fruit and vegetables and contribute to people eating healthier food¹⁵. The joint scrutiny panel heard evidence from Seeds from Growth on the benefits of community gardens. In recent times, habits and behaviours have increasingly encouraged sedentary lifestyles leading to higher levels of stress and poor physical and mental health.¹⁶ Food growing provides opportunities for social interaction, exercise, education in good nutrition and healthy eating, leading to improvements in residents' physical and mental wellbeing and personal resilience. It provides opportunities for the development of new skills and can be used as a pathway to support people into more active lives and potentially into employment.¹⁷ Food growing in the borough has a long history. The panel raised concerns about encouraging food growing given levels of pollution in the borough. However, it received evidence to suggest that the majority of food growing takes place in raised beds. Public health also advised that CO2 is important to the food growing process and with proper washing; no negative effects were anticipated if consumed.
- 6.23 Tower Hamlets Public Health delivered a presentation on its Communities Driving Change programme. The objective of the programme is to improve resident health and well-being by working with social landlords and residents to deliver an asset-based community development programme working across 12 neighbourhoods over at least 5 years, predominantly based in THH estates, but working also with other housing associations. The programme works with residents to co-produce open space design. The current themes

¹⁵ Greener Neighbourhoods: A good practice guide to managing green space, National Housing Federation

¹⁶ Visits to nature are associated with decreases in self-reported stress.

Annerstedt, M. (2011) Nature and Public Health. Aspects of Promotion, Prevention and Intervention. PhD Thesis, Swedish University of Agricultural Science, Alnarp, Sweden

¹⁷

www.sharedassets.org.uk/wp-content/uploads/2018/02/Local-economic-resilience-for-LAs.pdf

include improving social connections, reducing ASB and encouraging food growing. The programme works with communities by securing interest, mobilisation and participation. Projects include play area design, lighting improvements, planting and greening and food growing, street furniture, security/access and addressing anti-social behaviour. There was opportunity to expand project delivery across the borough and also connect with existing projects such as social prescribing and walking.

- 6.24 Outdoor gyms were recognised as a good method to encourage physical activity amongst residents. Currently health centres refer residents through social prescribing. Where Public Health has funded outdoor gyms, this includes exercise classes for up to a year to help people form habits, with good uptake by residents. Public Health works closely with social prescribing and is rolling out wellbeing hubs in the community (i.e. Idea Stores) in 2019, which also includes signposting to services.
- 6.25 The panel highlighted the need to ensure organisations are working closer together to achieve attractive and interactive open spaces. This includes engaging Council / Landlords and working with the Greater London Authority green space improvement framework.

RECOMMENDATION 1

R1 – Drawing on intelligence, the Council produces an up to date GIS map of housing open spaces, and encourage THHF to sample and assess the accessibility of sites in wards with open space deficiencies identifying any improvement options.

RECOMMENDATION 2

R2a – The Council to report back to the committee on new developments and their compliance with planning policies:

- Policy D.SG3: Health impact assessments
- Policy D.DH8: Amenity
- Policy S.SH1: Delivering high quality design
- Policy D.DH2: Attractive streets, spaces and public realm
- Policy S.CF1: Supporting community facilities
- Policy D.ES3: Urban greening and biodiversity
- Policy D.OWS3: Open space and green grid networks
- Policy D.DH6: Tall buildings
- Policy D.ES2: Air quality

R2b – The Council to prioritise and encourage underutilised spaces to be co-designed and transformed to deliver a balance between competing priorities.

Greening our Housing Estates – Management and Service Improvements

Managing Housing Open Spaces

- 6.26 The National Housing Federation advises social landlords to make a commitment to good quality green and open spaces at the highest level possible within the organisation. Well designed, managed and maintained

green space can reduce anti-social behaviour and save money on repairs. It sets out 10 principles for housing green space comprising of:

1. A commitment to quality
2. Resident involvement
3. Knowing the bigger picture – taking a strategic approach
4. Making best use of funding – secure, co-ordinate and use of partnerships
5. Design for local people – better design, procurement and project delivery
6. Develop training and skills – open space training opportunities for residents and staff
7. Maintaining high standards – long-term care for green and open spaces are treated as essential
8. Making places feel safe – through character and design to change use behaviour and improve personal safety
9. Promote healthy living – encourage activeness by promoting attractive and well maintained open spaces
10. Prepare for climate change – protection for flooding, heat waves and rising energy prices through urban greening¹⁸

6.27 In responding to the Housing Open Spaces survey of social landlords, social landlords highlighted a number of existing good practices in community greening. This includes:

- Enhancing bio-diversity, including working with friends of Tower Hamlets Cemetery Park
- Eco therapy project engaging those with substance misuse issues
- Residents maintaining communal areas, and numerous gardening & growing projects (incl. award winning), also helping to tackle ASB through joint responsibility
- Volunteer days engaging employees (from organisations/ corporate)
- Development of a toolkit to enable positive ecological site management and resident well-being working with the Natural Science Research Council.
- Outdoor gyms - 40% of landlords had outdoor gyms on estates. 10% were interested in exploring. 10% reported having multi-use games areas across various locations.

6.28 The Tower Hamlets Housing Forum delivered evidence of its collective approach to housing open spaces including through new development and regeneration. It highlighted that open spaces were designed at the planning process, which ensured landscaping proposals meet the needs of end users, with a mix of accessible space to relax and play and as visual amenity. This includes key design considerations, planting and ecology, safety, connectivity, play and the long term maintenance and viability of materials and planting. There was a mix of in-house and outsourced specialist maintenance provisions with published service standards. Residents are engaged to manage ASB, maximise open space usage and its provision of social value. However, there are conflicting demands on spaces – play vs quiet space. It highlighted that joint working with communities was paramount. It supported projects such as food growing, outdoor gyms and wellbeing including through grants.

Horticulture Maintenance & Biodiversity

¹⁸ Greener Neighbourhoods: A good practice guide 2011, National Housing Federation

- 6.29 The panel received a range of evidence from the Council and social landlords in horticulture maintenance being economically and environmentally friendly and enhancing bio diversity. The panel agreed that the sharing of advice, guidance, knowledge and training was crucial to improving the quality and benefits provided by housing open spaces.
- 6.30 The Local Biodiversity officer provided evidence on the importance of biodiversity, legislation and policy. In the action plan for gardens and grounds, under which housing open space falls, the following guidance is provided to social landlords and groups of residents managing community gardens:
- Record, protect and appropriately manage the priority habitats and features of value to priority species which already exist on their estates;
 - Create wildlife habitats such as meadows, small areas of woodland, orchards, and hedges within the landscaping around estates, and enhance any existing habitats;
 - Install bat boxes, nest boxes for birds, bee boxes and hedgehog homes in suitable places on estates;
 - Create loggeries and insect hotels;
 - Plant common or alder buckthorns and other food plants for butterfly caterpillars;
 - Plant nectar-rich flowers to provide food for wild bees and other insects;
 - Plant black poplars in suitable sites away from buildings and paths.”
- 6.31 FoTHCP provided further advice for both residents and housing management organisations on plantation to enhance the longevity of environmental and biodiversity impacts. This included:
- Planting of trees that are appropriate for their location and will not eventually require frequent reduction
 - Inclusion of slow growing trees – irreplaceable assets for the future
 - Planting bulbs and wildflower in grassland – low cost and flexible
 - Following good practice in creating highly successful nature friendly gardens such – i.e. East End Homes (EEH), winners of London in Bloom awards
 - Rolling training programme for staff and residents on sympathetic management practices for estate green space, including tackling negative perceptions – EEH a client
 - Community engagement, buy in, cohesion, planting days and reduces ASB
- Recommendations for social landlords:
- A move away from amenity mowing to bulb/wildflower grass
 - Tackling barriers to informed management
 - Sufficient training for grounds care staff and good coordination
 - Evaluating the purpose of derelict shrubberies
 - A joint training programme for grounds staff and residents
 - Delivery of simple and cheap interventions
- 6.32 The panel supported FoTHCP's advice in working with residents and social landlords to improve biodiversity. The panel raised concerns about a possible knowledge gap in maintenance staff being able to evidence how new and existing planting improved environmental benefits and air quality. They called on a strengthened approach to ensure intelligence based planting and review. The panel was informed that currently no baseline of bio diversity exists, however the objective of the Local Bio Diversity Action Plan was to enhance biodiversity, and this includes the monitoring of habitats on specific projects. The panel requested that the Local Biodiversity officer work with Tenants and Resident Associations to identify and monitor habitats on housing estates.

Horticulture Maintenance & Service Standards

- 6.33 In response to declining standards of parks maintenance a decision was made in late 2012 to in source the Councils grounds maintenance horticultural function. The Green Team encompasses all Parks Maintenance functions including Arboriculture works, Play area maintenance, cleansing, contract management and Horticultural maintenance.
- 6.34 The Green Team has assisted in maintaining parks to a high standard using the green flag awards as a guide. The Council has achieved a record number of Green Flag awards (11 parks and 3 community sites). Across a total of 27 categories, the purpose & aims of the award are to ensure: access to quality green and open spaces; appropriate management of spaces, established standards of good management, promoting and sharing of good practice, recognition and reward of employees and volunteers.
- 6.35 The Green Team has introduced a number of good practice techniques into its maintenance processes, comprising:
- Trees – Cyclical inspections by a qualified arboriculture, in line British Standards 3998 Trees Works
 - Play inspections - delivered according to the RoSPA, three tiered hierarchy of inspections of playgrounds. Routine inspections (weekly as a minimum) to assess condition and faults, recording and reporting. Operational inspection according to the RoSPA guide to routine inspections of playgrounds. Annual inspections are delivered by an independent organisation. Organisations should be checked to ensure their inspections are acceptable to insurance companies and suitable professional indemnity (at least £5 million) is carried.
 - Meadow management - twice yearly cut with arising's removed seasonally. Improves bio diversity and supports a reduction in amenity grass cutting.
 - Mulching Operations - sustainable methods of weed suppression. Mulching utilizing leaf mulch recycled from the previous season's leaf fall. Sshredded and returned to shrub beds as a form of weed suppression.
 - Sustainable Planting - nectar rich planting over seasonal planting schemes. More sustainable, better for biodiversity and less labour intensive.
 - Operational mobility and technology- A dedicated fitter responsible for breakdowns repairs and servicing. RFID scanners on gate to provide data on the locking / unlocking of gates and record patterns of ASB. QR code used with smart phones requiring a visit.
 - Increasing demands and skills - Maximising the effectiveness of resources, skills audits and upskilling staff. PA1/PA6 accreditations for using pesticides safely, First Aid, LANTRA on use of machinery and NVQ level 2 in horticulture management and RoSPA RPII routine or operational standards as required.
 - Apprenticeships - work with administrative apprentices, 4 50+ apprentices, and exploring the feasibility of establishing horticultural apprenticeships.
- 6.36 Tower Hamlets Homes provided evidence of its gardening service. In 2013 this service was brought in house, terminating a 5 year contract after just 2 years. This was due to poor performance and complaints. The service explained its approach to quality management through the grading of sites by London in Bloom Judges and has seen improved performance and a reduction in complaints. The service made the following changes of good practice:

- Tree stock of over 5000 trees, 3-4 year cyclical tree works programme and regular pruning. Planting of 50-100 trees per annum to replace those lost
- Creation of orchards on 3 housing estates
- Moved from grass cut and collect service
- Created over 50 wildflower areas
- Wood chipping of beds
- Installation of bird and bat boxes and insect hotels
- Supporting community food growing and bulb planting
- Improving employment prospects by providing paid work experience to long term unemployed clients of the Tower Project

6.37 Green space services which separated their day-to-day maintenance functions from the overall management found it harder to deliver good quality and efficient services than those that unified them. Separation can lead to competing priorities; communication failure and lack of familiarity with day-to-day operations, and can reinforce silo mentality. When services are integrated, priorities are more likely to be shared and there is better.¹⁹ There was an appetite amongst panel members for horticulture services by social landlords to be delivered in house. However, the panel as advised that this may be deliverable for smaller housing associations with the majority of their stock in Tower Hamlets, however for larger organisations this may not be achievable. The panel reinforced the need to share good practice, training for horticulture staff and supported horticulture apprenticeships. Not only would this support local employment but would also build a new generation of local horticulture experts.

6.38 The panel raised concerns over an existing knowledge gap of trees and shrubs, their air quality impact, and future strategies to improve air quality. Tower Hamlets Homes informed the panel they would clarify with the surveyor to what extent air quality considerations are taken on board.

RECOMMENDATION 3

R3 - The Council to encourage and support THHF to develop a good practice guide to achieve quality open spaces – to deliver health, environmental quality, economic and social outcomes. Comprising of priorities to:

- Green communities, roofs and balconies and support (incl. grants, tools and revenue funding (where possible)) community growing
- Improving access, encouraging usage and multiuse facilities on open spaces
- Eco friendly and environmentally grounds maintenance and intelligence based planting
- An online platform (webpage) for community greening, (either via THHF or by each social landlord) – including information, advice and guidance, policies, procedures, duties, health and safety, licenses and map of community growing projects established and new sites identified

Healthier and Greener Communities - Communications, Engagement and Partnership working

Healthier and greener communities

¹⁹ Managing green spaces, seven ingredients for success 2010, CABE SPACE

- 6.39 Community gardening and food growing is a thriving sector in Tower Hamlets with over 100 growing spaces.²⁰
- 6.40 Seeds for Growth have established food co-operatives throughout Tower Hamlets. These sell healthy fresh fruit and vegetables in areas where there is a high rate of poor diet related ill health. The volunteer led food co-operatives now provide healthy fresh food for 35,000 Tower Hamlets residents. The organisation has identified c.7 underutilised green spaces in Tower Hamlets (E14) that could be transformed into community gardens. It presented case studies of successful projects and their achievements. This included inter-generational social impacts, tackling the stigma of and contributing to a reduction in mental health conditions, anxiety and depression and supporting move on for clients into education, employment or volunteering.
- 6.41 Seeds for growth provided a guide to developing community gardens. This included engaging landlords and volunteers, establishing a steering committee, design choices, seeking supportive funds from landowners for installation and running costs (water and electricity), roles and responsibilities. The organisation advised how it supports the committee established to raise funds and donations for on-going running costs to ensure sustainability. It presented a range of recommendations for the panel to consider comprising of a Tower Hamlets community gardens policy, grant funding through potential sources, negotiation of supplier discounts, community garden website and app – for all to access for advice, guidance and news bulletins.
- 6.42 Evidence was received from the Women’s Environment Network (WEN) who working with local organisations (including social landlords) has supported local healthy and sustainable food, through the Tower Hamlets Food Growing Network. WEN aims to inspire residents (including those vulnerable) to get involved with gardening, food growing, nature and the environment. It supports growing communities in underused spaces and social prescribing. Examples of different models of successful gardens (meanwhile sites, housing sites, organisations), how to encourage growing gardens, and the challenges often faced was provided. This included the growth of gardens groups (and its development), funding and sponsorship, volunteers and friends groups. Challenges included financial sustainability of projects, building a group that is inclusive, sustainable and resilient. Currently funded by City Bridge and community grants, WEN explained that it has funds to work strategically across the borough²¹.
- 6.43 The committee received evidence from Tower Hamlets Homes, Poplar HARCA, East End Homes, and volunteers in their priorities to promote community greening and growing in Tower Hamlets.
- 6.44 Tower Hamlets Homes provided evidence of its demand led and fast growing community food gardens, across 24 sites 46% of which were located in Bethnal Green. These projects were making positive use of public space including reducing youth ASB. These food gardens had licenses, were community owned and managed, comprised of c.527 growing beds and had 1,500 regular users. Food gardens provided intergeneration activities, and were provided with information and clear protocols.

²⁰ Women taking action for a healthier environment, Women’s Environment Network, presentation 23rd March 2019

²¹ Women taking action for a healthier environment, Women’s Environment Network, presentation 23rd March 2019

- 6.45 The food gardens provided residents who lived in flats and had no private gardens the opportunity to enjoy greening, growing and the benefits this brought. This included increased cohesion, neighbourhood satisfactions, engagement in formal structures etc. It reported that 79% of residents engaged had reported an improvement in their Health and Well-being, and an 84% improvement in cohesion. However there was still more to be done. This included increasing partnership working and learning amongst community food gardens, providing further economic and environmental value and sharing of resources, the establishment of a health and community impact survey and a the development of new community food garden network.
- 6.46 The panel went on a Site Visit to an award winning THH site on the Teesdale and Hollybush Estate in Bethnal Green. It comprises of a number of raised beds which promote growing and encourages communities to communicate, work together and enjoy each other's company. The gated but unlocked site has instilled a sense of community ownership, pride and togetherness. Margaret Cox (Chair of Teesdale & Hollybush Tenants and Residents Association) and colleagues have renovated more than 13 disused sites with the help of corporate and local volunteers, creating a 'mini Eden' where local nature can thrive. The eye-catching sites include a children's playground, a number of allotments and Tower Hamlet's first orchard, Strawberry Fields. Creative in their use of resources, they keep sustainability at the heart of what they do – even some of the plants have been recycled from local park rangers or house clearances. One of the year-on-year award winning sites, Rocky Park, provides free plots to residents to encourage them to grow their own healthy produce. The original allotments were so popular they quickly had to expand to allow for more grow beds²².
- 6.47 Approach Community Food Garden, which was established in 2010 is also an award winning garden which provides gardening access for residents, schools, nurseries and wheelchair users. It has achieved tremendous success in making gardening more welcoming and accessible for all members of the community by tackling communication barriers, promoting healthy eating and the sharing of produce, enhancing bio diversity, communal composting, delivering parties and gatherings to bring communities together.²³
- 6.48 Poplar HARCA provided evidence of its 15 resident led community garden projects, which engaged over 1,000 residents per year and helped enhance partnerships with over 23 organisations. It worked with partners to maximise resources for newly formed food growing clubs/associations and provided continued assistance including facilitation of volunteers and funding sources. It supported transformation of unused /idle spaces often littered with dog poo and fly tipping into community gardens, a green hub and community green house, orchard and play space. This extended to a roof top garden home to 2 beehives producing over 410lbs of honey in 5 years, sold in community hubs, and also used as a remedy for the treatment of hay fever. The gardening projects have engaged schools, young people, volunteers (including corporate volunteers and attracting funds), and has supported community leaders through training, growing competitions (including national entries) cook-offs and supporting the establishment of resident led social enterprises.

²² <http://www.lovebethnalgreen.com/bethnal-greener/>

²³ Growing together, Approach Community Food Garden, presentation 23 March 2019

Quotes were provided to evidence the impact that these gardens have had on communities:

“Did not have to buy vegetables throughout the summer”

“I believe this has saved the NHS from spending thousands in supporting me to overcome my panic attacks. Social Services would have saved loads looking after my children. This community garden has restored my sanity and has given me strength”

“I feel closer to my neighbours now having had the chance to work and chat with them in the garden. The sense of community is back”

“It’s a delight to care for plants with support from young people. I thought that they do nothing but play computers these days (if not cause trouble!)”

“It has raised people’s awareness of wildflowers and their benefits to bees and other insects. Raised the profile of beekeeping in Poplar”

“Raised awareness of children about where food comes from and how good food impacts on their health.”

- 6.49 A case study was provided of the gardening journey of an isolated and homebound woman with limited English and poor health. Since being granted a patch in a local community garden, the woman has been able to interact socially with other gardeners, build friendships, overcome language barriers, and improve her health and well-being. She is now more active, can stretch, walk, and bend more. She grows herbs at home during the winter months and thanks the “garden community for making [her] feel alive again”. The panel agreed that this was not an isolated case and that many residents in Tower Hamlets were in similar positions.
- 6.50 East End Homes provided evidence of its approach to community greening and growing and play areas. It explained that following stock transfer a revisiting of sites led to change, including through regeneration to achieve sustainable development, enhance bio diversity that benefit the environment and communities. Through an in-house gardening team and a green design in contract arrangements, community engagement and events and with the assistance of corporate volunteers (Morgan Stanley) it has been able to transform spaces, green balconies and work with residents to achieve compliments and awards.

Friends Group

- 6.51 Friends of Victoria Park provided evidence to the panel of its work in the award winning Victoria Park (Green Flag Awards) and the benefits friends groups and volunteering can bring to improving spaces. The friends group through dialogue with the Council delivers improvements, secures funds, encourages participation of users, delivers a programme of community events, and ensures robust upkeep and maintenance of the park. The friends group is exploring an outdoor classroom and outdoor gym equipment. Whilst resources were available to support the establishment of other friends groups, it also informed the panel that a transformed training centre was available on the site which can be utilised by organisations.

- 6.52 It was evident that there was a history of community greening and growing in Tower Hamlets, and this was in increasing demand. However, the panel agreed that there needed to be a clear, consistent and collective approach across the borough where good practices in management, horticulture maintenance, community greening and growing are shared by social landlords through the Tower Hamlets Housing Forum.
- 6.52 Whilst a number of greening and growing projects were being delivered, a collective and robust approach to supporting the sustainability of these is needed, exploring supportive grants, access to funds available, and sharing of resources etc. The panel agreed that in supporting the objectives of the review, landlords should utilise resources available and reduce costs through taking an economies of scale approach. This includes widening the scope of the THHF Community Involvement Network's 'food growing and managing a food garden training session' to a broader development programme for staff and residents to cover community greening and growing, policy, protocols and good practice.

RECOMMENDATION 4

R4 – The Tower Hamlets Housing Forum's Community Involvement Network supported by the Council to facilitate the delivery of projects that encourage community greening, growing and quality open spaces that deliver wide benefits.

RECOMMENDATION 5

R5 – The THHF Community Involvement Network to widen the scope of its 'food growing and managing a food garden training session' to a broader development programme to cover community greening and growing (available to both residents and staff) comprising:

- The Green flag awards for housing
- Intelligence based planting, enhancing biodiversity and green recycling
- Benefits of friends groups
- Community greening and growing - policies, procedures, duties, health and safety, and licenses
- THHF good practice guide and sharing of good practices
- Supporting a cottage industry and resident led social enterprises
- Local employment initiatives in horticulture

Appendix A – Housing Open Spaces Scrutiny Review Action Plan

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APPENDIX 2 - SCRUTINY REVIEW ACTION PLAN: Improving health, environmental quality, economic and social outcomes through Housing Open Spaces

Action	Responsibility	Date
<p>Recommendation 1: Drawing on intelligence, the Council produces an up to date GIS map of housing open spaces, and encourage THHF to <u>sample</u> and assess the accessibility of sites in wards with open space deficiencies identifying any improvement options.</p>		
<p><i>Service comments:</i> Members of the Housing and Regeneration committee have been advised that the production of a GIS map of housing open spaces is subject to additional resources needing to be identified. This includes financial and staffing both in the production and ongoing maintenance of the GIS map. An approximate calculation of c. £38,000 has been arrived at to support the production of the map alone. This recommendation will therefore only be deliverable on the identification of additional budgetary provision.</p> <p>The internal management structures for this piece of work will also need to be clarified if Cabinet decides to dedicate resources towards the production of and maintenance of a GIS map of housing open spaces.</p>		
<p>1.1 THHF to support the Council to produce an up to date GIS map of housing open spaces (housing amenity land)</p>	<p>Divisional Director, Housing and Regeneration, TH Council</p>	<p>March 2020 (tbc)</p>
<p>1.2 Using the projected levels of open space deficiencies by ward (Open Space Strategy 2017-2027), the Council to map and identify wards with housing open space deficiencies.</p>	<p>Divisional Director, Housing and Regeneration, TH Council</p>	<p>June 2020</p>
<p>1.3 THHF to deliver a pilot project to explore the accessibility of housing open space sites (sample) in wards with the greatest open space deficiencies identifying improvement options (including the unlocking of sites where this is considered the most suitable option following stakeholder consultations).</p>	<p>Chair of Tower Hamlets Housing Forum</p>	<p>October 2020</p>

APPENDIX 2 - SCRUTINY REVIEW ACTION PLAN: Improving health, environmental quality, economic and social outcomes through Housing Open Spaces

<p>Recommendation 2: (a) The Council to report back to the committee on new developments and their compliance with planning policies (below).</p> <p>Policy D.SG3: Health impact assessments Policy D.DH8: Amenity Policy D.H3: Housing standards and quality Policy S.SH1: Delivering high quality design Policy D.DH2: Attractive streets, spaces and public realm Policy S.CF1: Supporting community facilities Policy D.ES3: Urban greening and biodiversity Policy D.OWS3: Open space and green grid networks Policy D.DH6: Tall buildings Policy D.ES2: Air quality</p> <p>(b) The Council to prioritise and encourage underutilised spaces to be co-designed and transformed to deliver a balance between competing priorities</p>		
<p>[Insert Comments]</p>		
<p>2.1 Monitoring of policies in the Council’s adopted Local Plan relating to the delivery of open spaces, including those in housing developments, where these are publically accessible, and through the decision making process, ensure these are to a high quality. And in the draft Local Plan (anticipated for adoption in late 2019) investigate further indicators that would allow us to further monitor this in more detail. This would be reported in the Annual Monitoring Report and to Housing Scrutiny.</p>	<p>Adele Maher, TH Council</p>	<p>17/18 AMR March 2020 18/19 AMR March 2021</p>
<p>2.2 Organised by the Councils Members support service, members of the Housing and Regeneration Scrutiny Sub Committee and Strategic Development Committee to carry out a site visit of a recently completed housing development, with feedback reported back to the Strategic Planning Team and THHF.</p>	<p>Adele Maher, TH Council</p>	<p>February 2020</p>
<p>2.4 The Council’s Strategic Planning service to report the findings of the high density living survey and next steps to the THHF Executive and the Housing Scrutiny Sub</p>	<p>Adele Maher, TH Council</p>	<p>Dec 2019</p>

APPENDIX 2 - SCRUTINY REVIEW ACTION PLAN: Improving health, environmental quality, economic and social outcomes through Housing Open Spaces

Committee.		
2.5 The Council to explore with stakeholder engagement the co-designing and transformation of underutilised spaces on Council land to deliver a balance between competing priorities, encouraging and engaging RPs to do the same, reporting progress back to the committee. By March 2020: • Engagement on environmental improvements on Locksley Estate • Creation of a project park on Shelmedine close. • Co-designing land formerly occupied by the Berner TRA, to deliver a community garden.	Jane Abraham and Rupert Brandon, TH Council	Ongoing
2.6 Public Health to lead and explore the expansion of the communities driving change programme working with landlords and residents to co-design open spaces, and continue to identify sites for outdoor gyms.	Somen Banerjee, TH Council	Ongoing
2.7 Communities driving change programme - Public Health to report back on progress and outputs / outcomes achieved to the Community Involvement Network.	Somen Banerjee, TH Council	March 2020 and ongoing
<p>Recommendation 3: The Council to encourage and support THHF to develop a good practice guide to achieve quality open spaces – to deliver health, environmental quality, economic and social outcomes. Comprising of priorities to:</p> <ul style="list-style-type: none"> - Green communities, roofs and balconies and support (incl. grants, tools and revenue funding (where possible)) community growing - Improving access, encouraging usage and multiuse facilities on open spaces - Eco friendly and environmentally grounds maintenance and intelligence based planting 		
[Insert Comments]		
3.1 THHF to develop a collective good practice guide for community greening and quality open spaces.	Chair of THHF	June 2020 and ongoing
3.2 Sharing through the public realm / benchmarking sub group good practices in grounds maintenance procurement and delivery with a focus on environmental, economic and	Chair of THHF	June 2020 and ongoing

APPENDIX 2 - SCRUTINY REVIEW ACTION PLAN: Improving health, environmental quality, economic and social outcomes through Housing Open Spaces


community benefits		
3.8 The Council to share with THHF its procedure for the Inspection And Maintenance Of Play Areas, presenting this to the benchmarking sub group and training staff on its inspection regime as required.	Chair of THHF and Matthew Twohig, TH Council	June 2020
3.3 The THHF CIN to agree the best method to establish a platform for community greening in the borough, publishing the good practice guide and developing a map of community growing projects and contacts.	Chair of THHF	June 2020 and ongoing
3.4 The Council's Biodiversity officer to attend the Public Realm Sub group to re-introduce the Local Bio Diversity action Plan and its priorities, encourage support and regular engagement (2-3 reps) with the Bio Diversity Steering Group.	John Archer, TH Council	March 2020
3.5 Through the THHF Public Realm Sub Group, each Landlord to nominate a key contact specialising on biodiversity matters to be added to the Council's biodiversity mailing list.	Chair of THHF	March 2020
3.7 The Council's Sustainability team to explore through retrofitting, the greening of flat roofs of existing social housing stock, working with the THHF Executive.	Abdul Khan TH Council and Susmita Sen THH	March 2020
Recommendation 4: The Tower Hamlets Housing Forum's Community Involvement Network supported by the Council to facilitate the delivery of projects that encourage community greening, growing and quality open spaces that deliver wide benefits.		
[Insert Comments]		
4.1 The THHF Community Involvement Network to identify projects for all seasons (working with local residents, volunteers, organisations, schools and charities - to engage the elderly, vulnerable, children, young people, and economically inactive in community greening and growing).	Chair of THHF	December 2020
4.2 The Council's Housing Partnerships Team to co-ordinate submissions by THHF for community greening awards, including the Tower Hamlets in bloom awards, maximising bids in the innovation category.	Tracey St Hill, TH Council	Ongoing
4.3 The Council's Housing Partnerships Team to support the THHF's Public Realm sub	Tracey St Hill, TH	Ongoing

APPENDIX 2 - SCRUTINY REVIEW ACTION PLAN: Improving health, environmental quality, economic and social outcomes through Housing Open Spaces

group / Community Involvement Network to co-ordinate the entry of community greening bids, accreditations and delivery of scrutiny outcomes.	Council	
4.4 A community greening platform for residents, including information, advice and guidance, policies, procedures, duties, health and safety, licenses and a map of community growing projects.	Chair of THHF	December 2020
<p>Recommendation 5: The THHF Community Involvement Network to widen the scope of its ‘food growing and managing a food garden training session’ to a broader development programme to cover community greening and growing (available to both residents and staff) comprising:</p> <ul style="list-style-type: none"> • THHF good practice guide and sharing of good practices • The Green flag awards for housing • Intelligence based planting , enhancing biodiversity and green recycling • Benefits of friends groups • Community greening and growing - policies, procedures, duties, health and safety, and licenses • Supporting a cottage industry and resident led social enterprises • Local employment initiatives in horticulture 		
[Insert Comments]		
<p>5.1 Co-ordinated and facilitated by the THHF Community Involvement Network, the THHF resident training programme to extend its remit to comprise of:</p> <ul style="list-style-type: none"> - Training for environmental teams on the green flag awards guidance for housing - Ongoing training to ensure intelligence based planting and to enhance biodiversity (residents, TRA’s and horticulture staff) - Training on the benefits of friends groups, encouraging TRAs to take on the role - Borough wide training on the consolidated approach to community greening and growing - policies, procedures, duties, health and safety, and licenses - Sharing of good practices - Learning from successful organisations and experts in supporting local food growing, 	Chair of THHF	June 2020 and ongoing

APPENDIX 2 - SCRUTINY REVIEW ACTION PLAN: Improving health, environmental quality, economic and social outcomes through Housing Open Spaces

selling of those products at events and the creation of social enterprises. - The delivery of local employment initiatives in horticulture		
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<p>Cabinet</p> <p>27 November 2019</p>	 <p>TOWER HAMLETS</p>
<p>Report of: Will Tuckley, Chief Executive</p>	<p>Classification: Unrestricted</p>
<p>Strategic Plan Performance & Delivery Reporting: Quarter 2 of 2019/20</p>	

Lead Member	Mayor John Biggs
Originating Officer(s)	Sharon Godman – Divisional Director Strategy, Policy & Performance Thorsten Dreyer – Head of Intelligence & Performance
Wards affected	All
Key Decision?	No
Forward Plan Notice Published	9 August 2019
Reason for Key Decision	N/A
Strategic Plan Priority / Outcome	All

Executive Summary

This report provides the Mayor in Cabinet with an update on the delivery and implementation of the council’s Strategic Plan throughout 2019/20.

Recommendations:

The Mayor in Cabinet is recommended to:

1. Note the Quarter 2 2019/20 summary status as set out at the beginning of the attached monitoring report;
2. Review the performance of the strategic measures at the end of Quarter 2 2019/20, including those measures where the minimum expectation has been missed; and
3. Review progress in delivering Strategic Plan activities.

1. REASONS FOR THE DECISIONS

- 1.1 The council’s Performance & Accountability Framework sets out the process for monitoring the timely and effective delivery of the Strategic Plan to improve outcomes for residents. In line with the framework, the Mayor in Cabinet receives regular update reports to ensure oversight of pace, delivery,

performance and improvement at Cabinet level.

- 1.2 This report promotes openness, transparency and accountability by enabling Tower Hamlets residents to track progress of activities that impact on their lives and the communities they live in.

2. ALTERNATIVE OPTIONS

- 2.1 Cabinet can decide not to review the performance information. This is not recommended as Members have a key role to review and challenge underperformance and also utilise performance information to inform resource allocation.

3. DETAILS OF THE REPORT

3.1 *Background*

- 3.2 The Strategic Plan is the councils' main business plan and embeds the Mayor's manifesto into council delivery. This report provides the Mayor in Cabinet with an update on the delivery and implementation of the council's Strategic Plan throughout the year.

- 3.3 As part of the budget setting report at the beginning of 2018, the council adopted a set of eleven new corporate outcomes grouped under three priorities. This was the first step on moving the council to becoming a much more outcome-based organisation which focuses on making a difference to people's lives.

- 3.4 The council's transition to becoming a truly outcome-based organisation is continuing and in April 2019 Cabinet adopted the Strategic Plan 2019/20 – 2021/22. The new plan builds on the changes the council made in 2018/19 and is underpinned by a revised set of performance measures, which are aligned to the council's corporate outcomes. Some of the new measures have been carried forward from 2018/19 while others have been replaced as they did not fully assess the difference the council is making to residents' lives.

- 3.5 The 2019/20 quarter 2 report provides an update on pace, delivery and performance for each corporate outcome. The outcomes are:

Priority 1: People are aspirational, independent and have equal access to opportunities

- People access a range of education, training, and employment opportunities.
- Children and young people are protected so they get the best start in life and can realise their potential.

- People access joined-up services when they need them and feel healthier and more independent.
- Inequality is reduced and people feel that they fairly share the benefits from growth.

Priority 2: A borough that our residents are proud of and love to live in

- People live in a borough that is clean and green.
- People live in good quality affordable homes and well-designed neighbourhoods.
- People feel safer in their neighbourhoods and anti-social behaviour is tackled.
- People feel they are part of a cohesive and vibrant community.

Priority 3: A dynamic, outcomes-based Council using digital innovation and partnership working to respond to the changing needs of our borough

- People say we are open and transparent putting residents at the heart of everything we do.
- People say we work together across boundaries in a strong and effective partnership to achieve the best outcomes for our residents.
- People say we continuously seek innovation and strive for excellence to embed a culture of sustainable improvement.

3.6 *Setting targets and improving outcomes*

3.7 The council is committed to driving progress forward which sees us deliver high performing services and in turn improved outcomes for our residents. As part of our move to becoming an outcomes based organisation, we have introduced a more mature approach to performance management approach which seeks improvement while at the same time taking into account more clearly the operating realities we face.

3.8 We need to take into account factors affecting local government today. For example, budgetary constraints mean we have to do more with less whilst our population continues to grow and expectations rise.

3.9 Absolute numerical improvement is often less appropriate now that we have rightly refocussed our activities on improving the life chances of our most vulnerable residents. A focus on numerical improvement can drive the wrong kind of behaviour and place the focus in the wrong area of concern.

3.10 Our improvement journey has been steep, and whilst there is no doubt that we need to continue improving, there is also recognition that sustainability is important. Improvements and new ways of working take time to bed in, and our targets need to reflect this.

- 3.11 Our target setting principles take these challenges into consideration:
- We will only set targets for performance indicators and not for contextual indicators. Contextual indicators are those less directly in the council's control but which are important for prioritising council investments and actions.
 - Targets will be set using a bandwidth approach consisting of a target and a minimum expectation.
 - The target (upper bandwidth) should adhere to one or more of the following target setting principles:
 - Be aligned to an external target, such as a statutory, national or Mayoral manifesto target, or target in strategies and policies where they have been agreed by Cabinet or a Tower Hamlets Partnership group;
 - Aim to improve on our benchmark performance position within the appropriate benchmark family group or maintain a high level of performance where we are among top performing councils;
 - Be based on management information evidence, especially for new measures where targets have previously not been set;
 - Take account of operational practicalities as described below;
 - In relation to perception surveys, we will monitor the direction of travel rather than set specific targets.
- 3.12 Targets for all measures are set against the operating realities of the service – for example service changes, funding changes, changes in legislation or in local or national policy. These changes may result in the need to re-baseline the targets from one year to the next to reflect the changing circumstances in which the service operates.
- 3.13 *Performance summary*
- 3.14 The plan on a page (page 2 of the attached report) summarises the number of activities and measures, which are rated green (meeting the target), amber (delayed or not meeting the target), or red (not meeting the deadline or minimum expectation).
- 3.15 At the end of quarter 2 2019/20 all 73 strategic plan activities are expected to be delivered by the end of the year.
- 3.16 At the same time, 17 performance indicators have met or are exceeding their target and 9 are between the target and the minimum expectation, while 8 are falling short. The remaining 24 indicators are data only measures or do not have an expected data return in quarter 2 2019/20.
- 3.17 Indicators that have fallen short of the minimum expectation broadly fall into the main areas of the business as set out below:

Integrated health and social care

- direct payments to adult social care user;
- delayed discharges from hospital as a result of social care services;

Education, training and employment (WorkPath)

- residents from BAME backgrounds supported into work;
- residents from deprived postcode areas supported into work;

Housing supply and homelessness

- homelessness prevention;
- affordable homes completions;

Waste and environment

- level of recycling;

In addition, the council's staff turnover rate is not meeting its target. The appended detailed report sets out the corrective actions services are taking to improve performance over the remainder of the year.

- 3.18 Throughout quarter 2 2019/20 we continued the pace of delivery and continued to implement the Mayor's manifesto.

Making Tower Hamlets safer

- 3.19 We are making Tower Hamlets safer by working more closely in partnership with other agencies and our communities. Our new specialist substance misuse service is now up and running. The new treatment provider will start to provide a more person centred recovery support service by the end of October to adults misusing drugs and alcohol. Alongside this, we have set up a new substance misuse investigation team, funded by the Mayor's Office for Policing and Crime (MOPAC). The aim of the Team is to use a support and compliance model, utilising powers provided by the Anti-Social Behaviour Crime and Policing Act 2014 to direct complex drug and alcohol users into treatment.
- 3.20 Working with residents is central to our work to tackle anti-social behaviour. In the last quarter we facilitated a Community Action Day in Rectory Gardens in Limehouse with the ward councillor and local residents to clear-up and rejuvenate the park and stop it becoming a magnet for ASB. We have another Community Action Day in the near future on the Hereford Estate working in partnership with local ward councillors, local residents and in partnership with Tower Hamlets Homes.

Tackling the housing crisis

- 3.21 So far this year we have granted permissions for 561 affordable housing units on ten sites. Of these sites only one is slightly short of our affordability policy of 35% of habitable rooms being affordable. Seven have achieved 100% affordability.
- 3.22 Our council homes building programme is continuing and work is progressing to deliver 77 new council homes at Jubilee Street, Baroness Road and the

Locksley A site, where practical completion is scheduled for June 2020. Contractors have been appointed for the development of 65 new council homes at Barnsley Street, Hanbury Street and Sidney Street and we expect to start on site by March 2020.

Putting young people and families at the heart of everything we do

- 3.23 We are putting young people at the heart of what we do. Over the summer we ran our free annual summer events programme for children, young people and their families. The programme in our youth centres, Idea Stores, leisure centres and parks brings people together and provides opportunities to learn new skills and develop new relationships. Our summer holiday scheme which provides childcare for children aged 3 to 13 years olds was rated 'Good' following an unannounced Ofsted inspection in August.
- 3.24 We have developed an enhanced careers programme to support middle-attaining pupils at Key Stage 3 in partnership with Tower Hamlets Education Business Partnership (THEBP), East London Business Alliance (ELBA) and others. Our year 7 workshop in July was attended by 210 students and volunteers from several organisations including Bank of England, Barclays, Clifford Chance, Barts NHS, Royal Bank of Scotland, WSP engineering, Acuris, ADM, and ADMISI. We encouraged pupils to talk to industry representatives, advised them on how to pick their GCSE's and they heard about latest research on future work opportunities from guest speakers.

Cleaning up our streets, cleaning up our air

- 3.25 We have taken key actions to clean up the borough's streets and air. Our eighth Big Clean Up saw residents and community groups lending a hand to help us clean up four areas in the borough (Capgemini between Limehouse Basin and Victoria Park; Good Gym with Barts Volunteers in the John Harrison Garden at the Royal London Hospital; Plastic Free Roman Road and Queen Mary University of London in Meath Gardens; and EY in Crisp Street Market).
- 3.26 We recently concluded a public consultation on the Tower Hamlets Transport Strategy 2019-2041. The new Strategy sets out plans to promote walking and cycling to help meet the Mayor of London's target that 90% of all trips in the borough should be made on foot, by cycle or by using public transport by 2041. We are planning to invest almost £16m on a carriageway and footway resurfacing programme. Approximately £3.2m of planned schemes have been committed to date.
- 3.27 We have continued work to improve our parks and open spaces. At Bartlett Park we have now closed Cottal Street to extend the park down to the canal and our designers are working on the detail for a new inclusive play area. We will be opening improved areas of the park in phases and expect to complete all work by February. At Allen Gardens we have recently consulted on plans to integrate Buxton Street into the park and provide a more pleasant area for people walking and cycling.

- 3.28 The Liveable Streets programme aims to improve the look and feel of public spaces in neighbourhoods across the borough and make it easier, safer, and more convenient to get around by foot, bike and public transport. We are working closely with residents and businesses to develop the projects and designs for the programme. In quarter 2 we held workshops, drop in sessions, and walkabouts in Bethnal Green, Wapping, Barkantine and Brick Lane, and these schemes are now active. We will be consulting on the first set of detailed proposals for Bethnal Green from late October.

Reducing poverty, inequality and improving health

- 3.29 We have been selected as one of four Local Authorities in England to work with the Children's Society on a three year project to co-ordinate crisis support in the borough to address child poverty. Our pension credit take up campaign has led to an increase in households now claiming pension credit. Activities to alleviate holiday hunger have taken place across the summer in a variety of locations including schools, leisure centres and the Idea Stores.
- 3.30 We will be starting our boiler replacement programme in October to alleviate fuel poverty. This programme is targeted at low income and vulnerable households and will deliver energy costs savings and reduce carbon emissions. We also run a fuel switching programme three times a year aimed at helping households find cheaper energy suppliers via a reverse style energy auction. Last quarter's switch saw residents benefit from an average annual saving of £212. The next energy auction will be held towards the end of 2019.
- 3.31 We have completely redesigned our commissioned finance and welfare advice offer as part of our move from Mainstream Grants to Local Community Fund. The Local Community Fund awards were made in July and confirmed in August. Funding under Theme 3: Advice and Information was awarded to a consortium to deliver 'Advice Tower Hamlets'. This service is led by Citizens Advice Tower Hamlets, in partnership with twelve local advice agencies and will provide residents with an improved advice offer.

4. EQUALITIES IMPLICATIONS

- 4.1 The council's Strategic Plan is focused on meeting the needs of the diverse communities living in Tower Hamlets and ensuring that everyone can play their part in a vibrant and cohesive community. The strategic outcomes and supporting activities are designed to reduce inequalities and the foster community cohesion. Equalities considerations are embedded in all outcomes of the Strategic Plan with specific actions focusing on areas of inequality identified through the Borough Needs Assessment being addressed under *Outcome 4 - Inequality is reduced and people feel that they fairly share the benefits from growth.*

5. **OTHER STATUTORY IMPLICATIONS**

5.1 This section of the report is used to highlight further specific statutory implications that are either not covered in the main body of the report or are required to be highlighted to ensure decision makers give them proper consideration. Examples of other implications may be:

- Best Value Implications,
- Consultations,
- Environmental (including air quality),
- Risk Management,
- Crime Reduction,
- Safeguarding.

5.2 *Best Value (BV) Implications*

5.2.1 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”. Monitoring of performance information and acting on the findings is an important way in which that obligation is being fulfilled.

5.3 *Sustainable action for a greener environment*

5.3.1 *Outcome 5 - People live in a borough that is clean and green* is dedicated to taking sustainable action for a cleaner environment. It focuses on key areas of sustainability, including air quality, waste and carbon emission. Key activities include work to drive up the borough’s recycling rate, reducing CO2 emissions, and implementing a number of initiatives to improve air quality, including making Tower Hamlets one of the best boroughs for walking and cycling through our Liveable Streets programme.

5.4 *Risk management implications*

5.4.1 In line with the council’s risk management strategy, the information contained within the strategic indicator monitoring will assist the Cabinet, Corporate Directors and relevant service managers in delivering the ambitious targets set out in the Strategic Plan. Regular monitoring reports will enable Members and Corporate Directors to keep progress under regular review.

5.5 *Crime and disorder reduction implications*

5.5.1 Strategic Plan *Outcome 7 - People feel safer in their neighbourhoods and anti-social behaviour is tackled* and *Outcome 8 – People feel they are part of a vibrant and cohesive community* are dedicated to crime and disorder reductions. Activities under these outcomes are designed to improve safety, the perception of safety and community cohesion. Key activities include making it easier for residents to report anti-social behaviour, provide specialist

support to victims of knife crime at the Royal London Hospital, and celebrate the diverse cultures and communities of the borough through our events and arts programmes.

5.6 *Safeguarding implications*

5.6.1 Strategic Plan *Outcome 2 - Children and young people are protected so they get the best start in life and can realise their potential* is dedicated to keeping children and young people safe from harm. In July 2019 Ofsted judged our children's social care service to be good. Our improvement journey in children's social care continues and we have retained this dedicated outcome to have continued corporate focus on better outcomes for the most vulnerable children and young people. Key activities include embedding our social care academy to make Tower Hamlets one of the best places to work as a social worker, and further improving our early help and intervention services to support children, young people and their families before problems in their lives escalate.

5.6.2 *Outcome 3 - People access joined-up services when they need them and feel healthier and more independent* incorporates is our key outcome in relation to safeguarding vulnerable adults. Key activities include projects to address childhood obesity and improve nutrition, as well as supporting greater choice and independence for those requiring adult social care.

6. **COMMENTS OF THE CHIEF FINANCE OFFICER**

6.1 This report sets out the delivery, performance and improvement position for the Strategic Plan during quarter 2 2019/20. There are no additional financial implications arising from the recommendations of this report.

7. **COMMENTS OF LEGAL SERVICES**

7.1 The report provides performance information. It is consistent with good administration for the council to consider monitoring information in relation to plans that it has adopted in order to achieve Best Value.

7.2 When considering its performance, 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). The council's targets are formulated by reference to its public sector equality duty and monitoring performance against those targets helps to ensure they are delivered.

7.3 There are no other legal implications directly arising from this report.

Linked Reports, Appendices and Background Documents

Linked Report

- NONE

Appendices

- Appendix: Strategic Plan 2019/20 quarter 2 monitoring report

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

- None

Officer contact details for documents:

N/A

Tower Hamlets Strategic Plan 2019-22



Working together with the community
for a fairer, cleaner and safer borough

Quarter 2 monitoring report

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Priority 1

People are aspirational, independent and have equal access to opportunities

2019/2022 Outcome 1

People access a range of education, training, and employment opportunities

Actions 0 0 8 0
 Pls 0 2 2 1 0

2019/2022 Outcome 2

Children and young people are protected so they get the best start in life and can realise their potential

Actions 0 0 7 0
 Pls 0 1 1 2 0

2019/2022 Outcome 3

People access joined-up services when they need them and feel healthier and more independent

Actions 0 0 7
 Pls 2 0 2 0 2

2019/2022 Outcome 4

Inequality is reduced and people feel that they fairly share the benefits from growth

Actions 0 0 5
 Pls 3 1 2 0 2

Priority 2

A borough that our residents are proud of and love to live in

2019/2022 Outcome 5

People live in a borough that is clean and green

Actions 0 0 8 0
 Pls 1 0 4 0 0

2019/2022 Outcome 6

People live in good quality affordable homes and well-designed neighbourhoods

Actions 0 0 8 0
 Pls 1 2 0 0 1

2019/2022 Outcome 7

People feel safer in their neighbourhood and anti-social behaviour is tackled

Actions 0 0 8 0
 Pls 0 1 2 0 2

2019/2022 Outcome 8

People feel they are part of a cohesive and vibrant community

Actions 0 0 5 0
 Pls 0 0 0 1 7

Priority 3

A dynamic outcomes-based Council using digital innovation and partnership working to respond to the changing needs of our borough

2019/2022 Outcome 9

People say we are open and transparent, putting residents at the heart of everything

Actions 0 0 4 0
 Pls 0 0 1 0 4

2019/2022 Outcome 10

People say we work together across boundaries in a strong and effective partnership to achieve the best outcomes for our residents

Actions 0 0 5 0
 Pls 0 1 2 0 1

2019/2022 Outcome 11

People say we continuously seek innovation and strive for excellence to embed a culture of sustainable improvement

Actions 0 0 8 0
 Pls 1 1 1 0 1

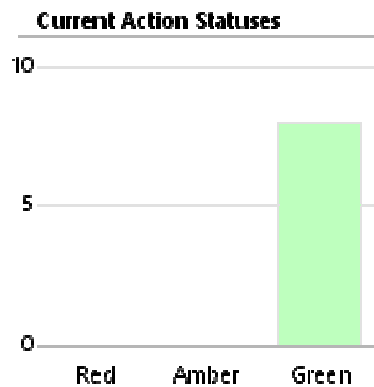
Outcome 1 People access a range of educational, training and employment opportunities.

High quality education is a stepping stone to high quality employment. In partnership with the Tower Hamlets Education and Partnership and our schools, we will continue to work hard to help our young people do well at school and go on to reach their full potential. Beyond school, we also want to support them and their families to be aspirational about their future and to have the opportunity to thrive in good jobs. This means equipping young people with the skills and confidence to succeed in the modern economy.

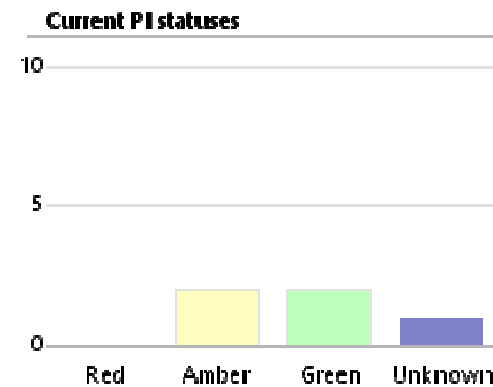
We want to help local residents to capitalise on the dynamic employment growth occurring around them. We want to encourage employers and education providers to work closely together in the design and delivery of education and skills training to reflect the needs of the job market. Higher education is not for everyone and people should be offered a range of routes into employment, including work placements and apprenticeships. We will push for economic investment that is coordinated and focused and for a borough that is a dynamic place for innovation and those who want to set up a business.

Status summary for this strategic outcome

Strategic action status chart



Strategic measure status chart



? New enterprises created with support from the Council's business development



This measure will count the number of residents or businesses in the borough involved in participating in any of the enterprise support projects that the council runs.

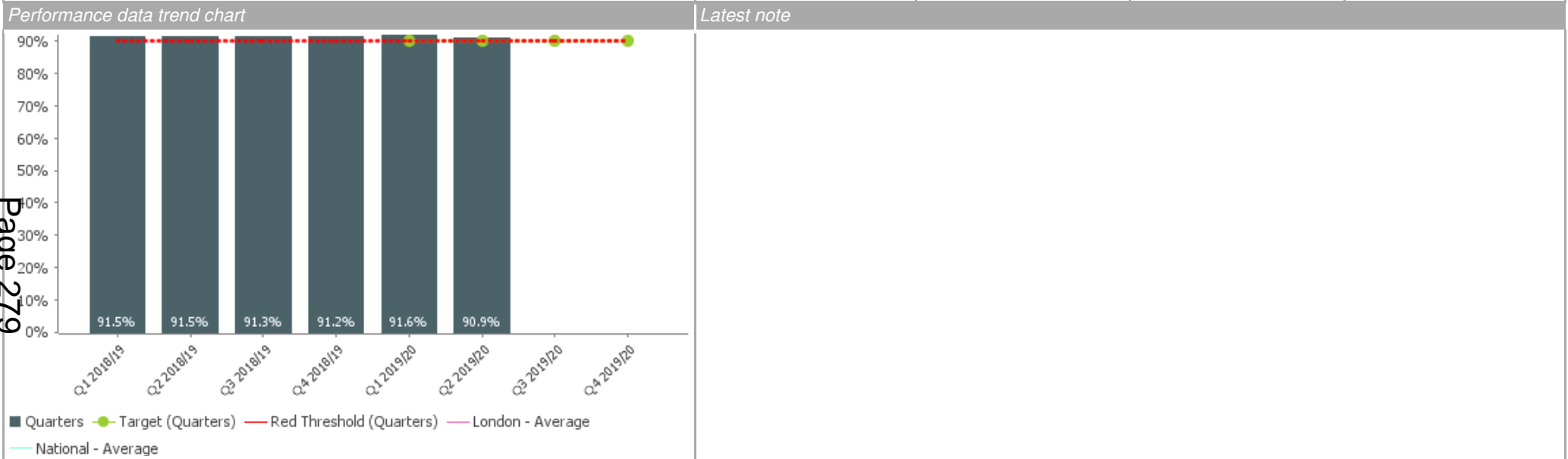
<i>Lead member</i>	<i>Last update</i>		<i>Short term trend arrow</i>	<i>Long term trend (DOT)</i>
Cabinet Member for Work and Economic Growth	Q2 2019/20		▬	▬
<i>Lead officer</i>	<i>Type</i>	<i>Target</i>	<i>Actual</i>	<i>RAG rating</i>
Divisional Director, Growth and Economic Development	Strategic	0	0	? Unknown

<i>Performance data trend chart</i>	<i>Latest note</i>
<p>Legend: ■ Quarters, ● Target (Quarters), — Red Threshold (Quarters), — London - Average, — National - Average</p>	<p>The Enterprise Team is not currently running an enterprise programme. Once funding has been approved for a successor programme to Start Up Ready is expected to be in place by the end of Q2, with outputs coming through towards the end of Q3. The target has been set low (30 for the year) this year because of this. Going forward the service expects to see 90 enterprises created in 2020/21.</p>

 **% of pupils attending secondary school regularly**




The percentage of pupils attending secondary school who attended at least 90% of their possible sessions.

<i>Lead member</i>	<i>Last update</i>		<i>Short term trend arrow</i>	<i>Long term trend (DOT)</i>
Cabinet Member for Children, Schools and Young People	July 2019			
<i>Lead officer</i>	<i>Type</i>	<i>Target</i>	<i>Actual</i>	<i>RAG rating</i>
Divisional Director, Education and Partnership	Strategic	90.2%	90.9%	 Green

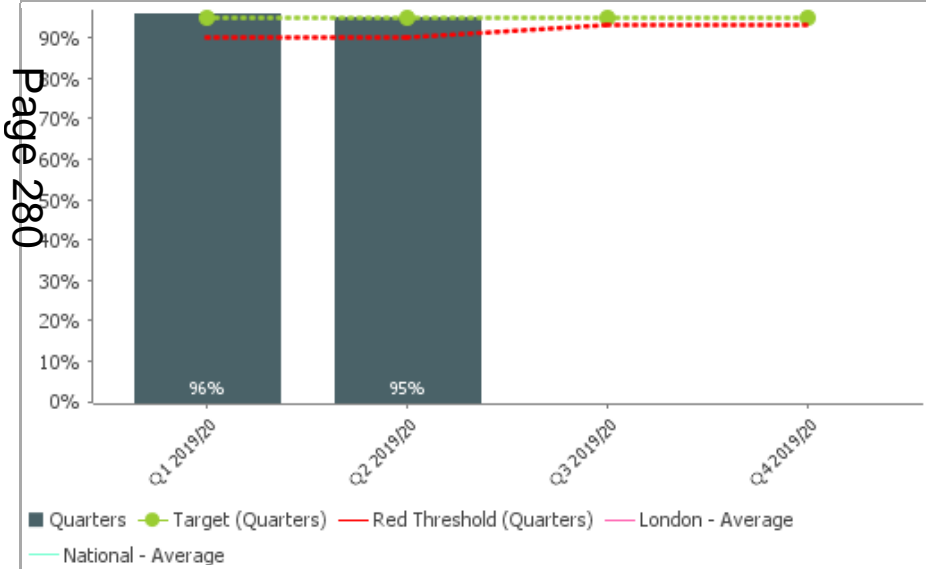


 **% of Idea Store Learning learners who pass their course**

The percentage of adult learners who completed their course successfully.

<i>Lead member</i>	<i>Last update</i>		<i>Short term trend arrow</i>	<i>Long term trend (DOT)</i>
Cabinet Member for Culture, Arts and Brexit Cabinet Member for Work and Economic Growth	Q2 2019/20			
<i>Lead officer</i>	<i>Type</i>	<i>Target</i>	<i>Actual</i>	<i>RAG rating</i>
Divisional Director, Customer Services	Strategic	95%	95%	 Green

Performance data trend chart *Latest note*



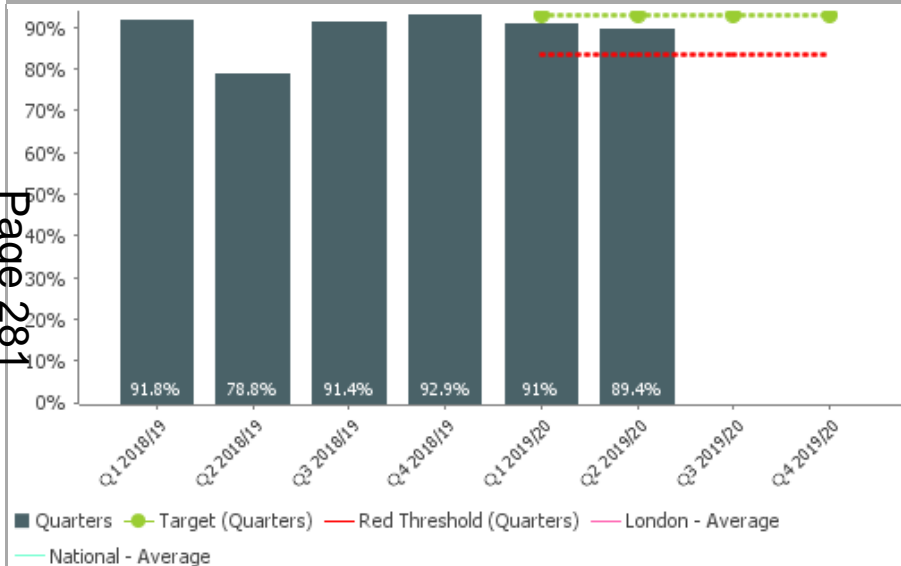
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Percentage of 16-17 year olds in education, employment or training

This indicator measures the proportion of 16-18 year olds who are in Education, Employment or Training (EET). The measure is based on tracking the progression of young people in the age group.

<i>Lead member</i>	<i>Last update</i>		<i>Short term trend arrow</i>	<i>Long term trend (DOT)</i>
Cabinet Member for Work and Economic Growth	Q2 2019/20		↓	↑
<i>Lead officer</i>	<i>Type</i>	<i>Target</i>	<i>Actual</i>	<i>RAG rating</i>
Divisional Director, Growth and Economic Development	Strategic	93%	89.4%	Amber

Performance data trend chart Latest note



Why is performance off target?

September data will be available at the beginning of November. In August, the cohort of young people in years 12 & 13 was 5,893. 5,266 young people are in education, employment or training. Although this is under the year-end target, we are in a better position that at the same point last year, when the cohort was 5,566 and 88.6% (or 4,932) of young people in years 12 & 13 were in education, employment or training.

What is being done to bring performance back on track and who is doing it?

Over the summer, the Young Workpath produced the September offer to students and will then start tracking 16-19 year olds to reduce the numbers of students for which the status is unknown.

When will performance be back on track?

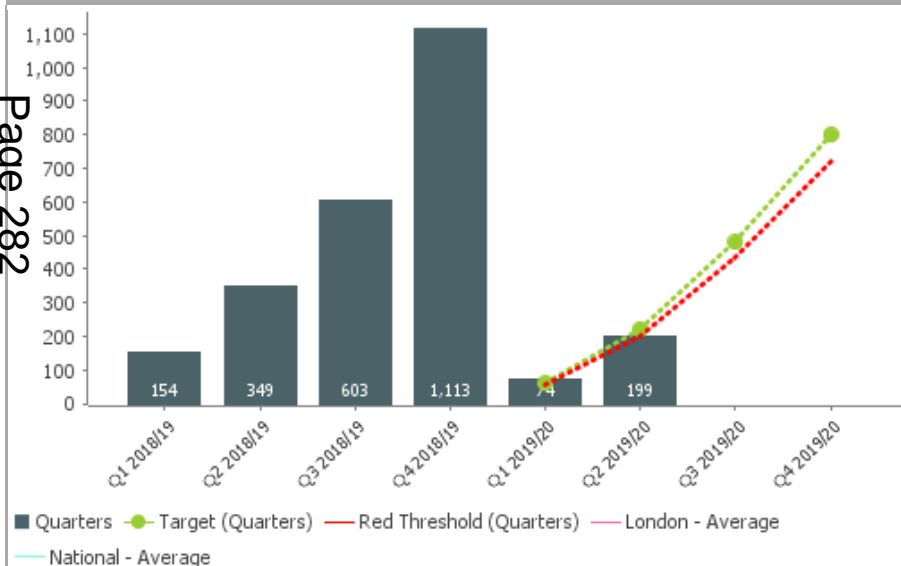
We expect to see the proportion of pupils who are in education, employment or training to increase by the end of Q3 as we have confirmation of pupils who have been accepted and are attending education or who are in employment or training.

▲ Adults supported into sustainable employment by the WorkPath service

Number of adults supported into employment by the Council's Workpath Service. Cumulative measure.

<i>Lead member</i>	<i>Last update</i>		<i>Short term trend arrow</i>	<i>Long term trend (DOT)</i>
Cabinet Member for Work and Economic Growth	Q2 2019/20		↓	↓
<i>Lead officer</i>	<i>Type</i>	<i>Target</i>	<i>Actual</i>	<i>RAG rating</i>
Divisional Director, Growth and Economic Development	Strategic	220	199	▲ Amber

Performance data trend chart



Latest note

Why is performance off target?

The service has recently gone through a restructure and there are still some vacancies which means that there are fewer staff than expected at this point in time, to support residents into work. In addition, we are still gathering evidence of jobs secured from employers.

The council has recently brought forward our reporting schedule so that we can report our performance and delivery in a more timely fashion. For its measures, the WorkPath service relies on employers to confirm the employment status of the residents we have supported into work and this evidence can take some time to come through. For this reason it is sometimes necessary to adjust outturns over the coming month, as more evidence is received. This data is therefore provisional.


What actions will be taken and who is doing this?


The service recently hosted a jobs fair for local residents. It is expected that there will be a number of job outputs arising from this event. In addition to working with employers, we also work hard to make to make contact with residents that we have recently supported into jobs to persuade them to provide evidence of their employment status. Unfortunately some residents are unresponsive to these requests.

When will it be back on track?


We expect performance to be back on track in the next quarter.


Strategic plan delivery


Strategic Plan activity		Note
Action 1.1 	Agree common expectations with key stakeholders e.g. schools, New City College, Job Centre Plus, the business community	A key theme of our Growth Plan concentrates on how we can prepare young people for success. Interventions under this theme take a targeted approach to enable young people to access information about their career options early on. Our objective is to help young people understand early on the range of opportunities open to them. In partnership with the East London Business Alliance a 'transition from education to employment' pilot project, called "Careers Carousels" delivered three careers education events at Swanlea School from October 2018 to July 2019. We have secured additional private partners to enhance the careers advice offer.
<i>Directorate</i>	<i>Lead Officer</i>	
Children and Culture Directorate; Place Directorate	Vicky Clark; Christine McInnes	
<i>Portfolio Owners</i>	Cabinet Member for Work and Economic Growth	Our achievement strategy for 14 - 25 year olds, developed by Children's Services in partnership with all key stakeholders, is due launch on October 30th at the first annual Education Partnership Conference, including all key stakeholders and many private sector partners. The strategy has clearly set out common themes and priorities for education and careers guidance for mainstream and special needs groups.

Strategic Plan activity		Note
Action 1.2 	Develop action plans based on individual needs assessments for those young people and adults we are supporting into education, training and employment opportunities (note - this action also supports Outcome 4)	Our WorkPath and Adult Learning Services have introduced a skills assessment system called Basic & Key Skills Builder (BKSB) with the long term outcome of collating consistent data on skills needs and to inform future commissioning of training. More immediately, all clients registering with WorkPath are now undertaking a full assessment to inform their personal action plan and undertake independent and assisted training modules in functional skills. The service is methodically working through pre-existing client lists to have them undertake the assessment. Alongside this, clients are interviewed reiteratively by their officer in order to develop and maintain their personal development plans.
<i>Directorate</i>	<i>Lead Officer</i>	
Place Directorate	Vicky Clark	
<i>Portfolio Owners</i>	Cabinet Member for Work and Economic	

Growth	
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<i>Strategic Plan activity</i>		<i>Note</i>
Action 1.3 	Develop a careers education programme for young people in years 7-9 (aged 11 to 14)	<p>We have developed an enhanced careers programme to support middle-attaining pupils at Key Stage 3 in partnership with Tower Hamlets Education Business Partnership (THEBP), East London Business Alliance (ELBA) and others. Stakeholder consultations and surveys took place at Wapping High School, Swanlea, George Green School, and Sir John Cass Redcoats. We piloted three careers events at Swanlea school. Our year 7 workshop in July was attended by 210 students and volunteers from several organisations including Bank of England, Barclays, Clifford Chance, St. Barts NHS, Royal Bank of Scotland, WSP engineering, Acuris, ADM, and ADMISI. We encouraged pupils to talk to industry representatives, advised them on how to pick their GCSE's and they heard about latest research on future work opportunities from guest speakers.</p> <p>The learning from the careers pilot has been written up and we are looking to roll out the next phase of the programme with five local schools and in partnership with Children's Services and several private sector partners. We have secured additional private sector partners interested in offering curriculum support, work experience and mentoring.</p>
<i>Directorate</i>	<i>Lead Officer</i>	
Place Directorate	Vicky Clark	
<i>Portfolio Owners</i>	Cabinet Member for Work and Economic Growth	

<i>Strategic Plan activity</i>		<i>Note</i>
Action 1.4 	Identify key skills and training for employment support professionals	<p>We offer a programme of continuous professional development to our staff to equip them with the tools and information to support others. All new Information, Advice and Guidance (IAG) Officers not already qualified to Level 3 IAG will be enrolled on the course. Careers Young WorkPath is seeking to attract new staff, possibly career graded apprentices, to train to the required Level 6 in Careers Guidance. This training will be open to others in the WorkPath service and partner services.</p>
<i>Directorate</i>	<i>Lead Officer</i>	
Place Directorate	Vicky Clark	
<i>Portfolio Owners</i>	Cabinet Member for Work and Economic Growth	

<i>Strategic Plan activity</i>		<i>Note</i>
Action 1.5 	Provide support to start-ups and existing business	<p>Setting up a business or working in a small entrepreneurial team can be a good opportunity for many disadvantaged residents to gain the financial means to live well in London. However, they can be constrained by confidence and lack of access to business skills,</p>
<i>Directorate</i>	<i>Lead Officer</i>	

Place Directorate	Vicky Clark	professional networks and affordable workspace.
<i>Portfolio Owners</i>	Cabinet Member for Work and Economic Growth	<p>Previous support projects for small and medium enterprises (SMEs) concluded in March 2019. The Enterprise Team is continuing to support new entrepreneurs by organising business networking and by referring individual enquirers to appropriate sources of support on a one-to-one basis.</p> <p>We are developing new projects, namely Marketing Ready and Start Up Ready. Once they've been finalised and approved, we will procure contracts in connection with specialist enterprise support services. We expect to start delivering these projects in the second half of this financial year.</p>


<i>Strategic Plan activity</i>	<i>Note</i>
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Action 1.6	Develop business networks and contacts with hiring managers	Our newly formed Growth and Economic Development (GED) partnership will be meeting at the end of October to agree its projects and priorities for the year ahead. The GED partnership's aims will be to support middle-achieving graduates into good jobs; enable employees to progress through in-work training; and to create business space in the borough suitable for the needs of growing businesses.
<i>Directorate</i>	<i>Lead Officer</i>	
Place Directorate	Vicky Clark	
<i>Portfolio Owners</i>	Cabinet Member for Work and Economic Growth	<p>In August we ran a hugely successful jobs' fair. Over 400 residents attended where they were able to apply for job opportunities and apprenticeships in organisations such as Transport for London and Vision Express. Our Workpath service will be monitoring the success of residents' applications. We are hopeful that our new working relationship with Vision Express will help us to secure more jobs for Tower Hamlets residents in their central London stores.</p> <p>We are actively targeting businesses to boost the supply and take up of apprenticeships in the borough. Of the 130 businesses we have targeted so far, we have received positive outcomes from 62, resulting in generating 71 job opportunities.</p>

<i>Strategic Plan activity</i>	<i>Note</i>
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Action 1.7	Provide access to entry point	We continue to provide entry point learning opportunities and deliver courses that promote
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	learning which promote personal development	personal development. Our most recent course evaluations show that 97% of our learners agree that their course challenges them to try new things and 97% of our learners find their course stimulating and interesting. Three new cohorts of learners will be starting on English as a Second Language (ESOL) courses for 'Childcare and Women into Health'.
<i>Directorate</i>	<i>Lead Officer</i>	
Resources Directorate	Shazia Hussain	
<i>Portfolio Owners</i>	Cabinet Member for Culture, Arts and Brexit; Cabinet Member for Work and Economic Growth	

<i>Strategic Plan activity</i>		<i>Note</i>
Action 1.8 	Improve our understanding of the current and future London labour market	We work closely with Central London Forward, the GLA, the Lifelong Learning Forum and North London boroughs to gather and analyse labour market data from a range of research and policy centres. We are currently scoping research funded by the Trust for London to look at under employment and in-work progression.
<i>Directorate</i>	<i>Lead Officer</i>	
Place Directorate	Vicky Clark	
<i>Portfolio Owners</i>	Cabinet Member for Work and Economic Growth	

Outcome 2 Children and young people are protected so they get the best start in life and realise their potential

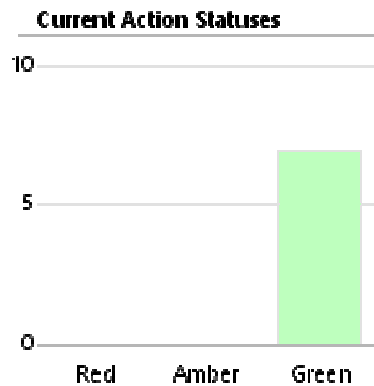
The formative years from 0 to 5 are absolutely critical to the future health and wellbeing of infants in Tower Hamlets. The integrated early years' service works with partners and stakeholders to address levels of provision and quality in early education and childcare. Similarly, health visitors play a crucial role in identifying and supporting our youngest children in need, making sure they get the best start in life. We want to ensure high quality provision to support the learning, development and care of young children to prepare them for school and their futures.

We have an important responsibility to safeguard and promote the welfare and safety of children in need. To do this, we will work with parents and families in the best interests of the children by listening to their views when making decisions. With our partners we will be launching our 'Children's' campaign with the aim of making Tower Hamlets a child friendly borough.

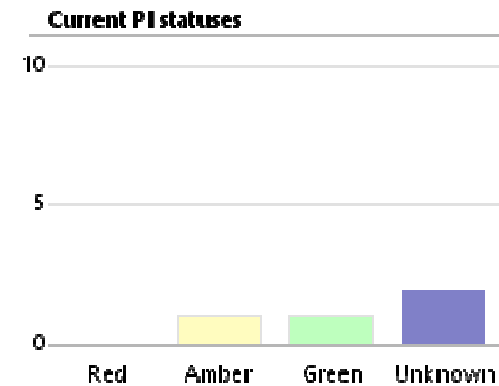
We want children and young people to be able to live in a safe environment, ensuring the best health and developmental outcomes.

Status summary for this strategic outcome

Strategic action status chart



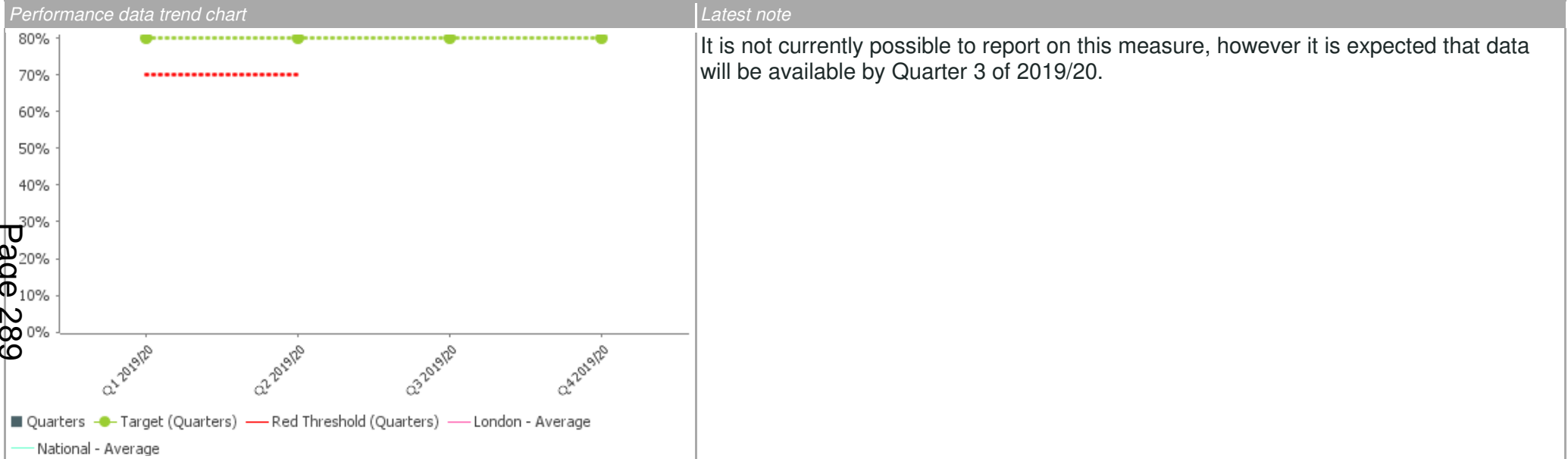
Strategic measure status chart



? Families who are seeing the benefits of being supported before problems escalate

This measure will show the percentage of families who achieved improved outcomes through Early Help support.

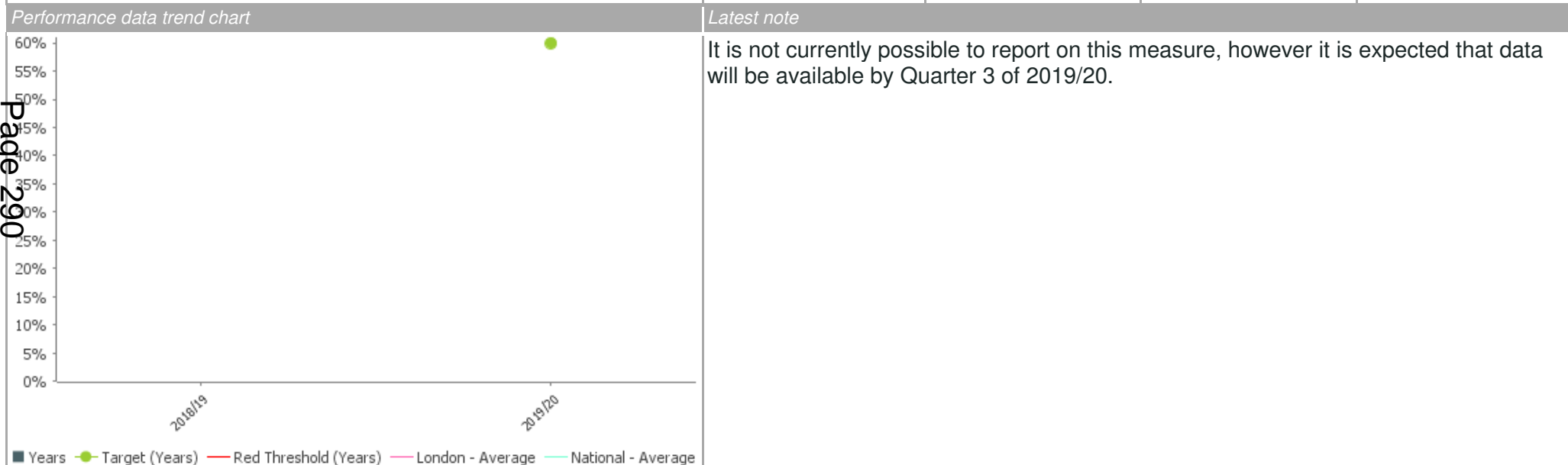
Lead member	Last update	Short term trend arrow	Long term trend (DOT)	
Cabinet Member for Children, Schools and Young People	Q2 2019/20	?	?	
Lead officer	Type	Target	Actual	RAG rating
Divisional Director, Youth and Commissioning	Strategic	80%		? Unknown



? Young people engaging with the youth service who achieve a recorded outcome


The percentage of young people who are engaged with the youth service who achieve a recorded outcome.

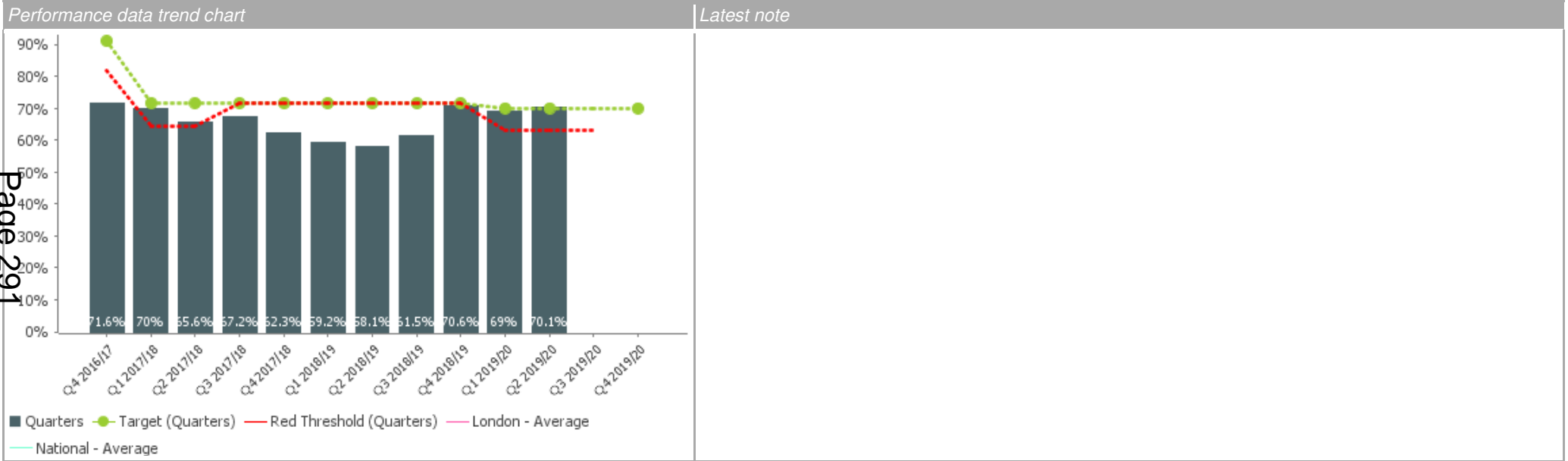
Lead member	Last update	Short term trend arrow	Long term trend (DOT)	
Cabinet Member for Children, Schools and Young People	Q2 2019/20	?	?	
Lead officer	Type	Target	Actual	RAG rating
Divisional Director, Youth and Commissioning	Strategic	60%		? Unknown



 **Long term looked after children who are in stable placements**

The percentage of children who have been looked after for two and a half years or more who have been in the same placement for at least the last two years or who are placed for adoption.

<i>Lead member</i>	<i>Last update</i>		<i>Short term trend arrow</i>	<i>Long term trend (DOT)</i>
Cabinet Member for Children, Schools and Young People	Q2 2019/20			
<i>Lead officer</i>	<i>Type</i>	<i>Target</i>	<i>Actual</i>	<i>RAG rating</i>
Divisional Director, Children's Social Care	Strategic	70%	70.1%	 Green

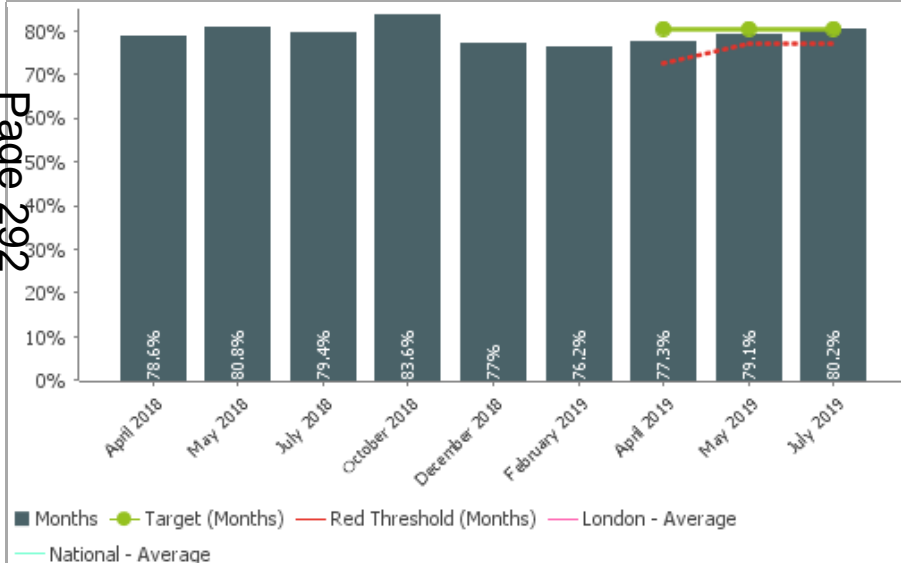


▲ Pupils who are regularly attending school in reception year

The percentage of pupils in Reception year who attended at least 90% of their possible sessions.

<i>Lead member</i>	<i>Last update</i>		<i>Short term trend arrow</i>	<i>Long term trend (DOT)</i>
Cabinet Member for Children, Schools and Young People	July 2019		?	↑
<i>Lead officer</i>	<i>Type</i>	<i>Target</i>	<i>Actual</i>	<i>RAG rating</i>
Divisional Director, Education and Partnership	Strategic	80.5%	80.2%	▲ Amber

Performance data trend chart



Latest note

Why is performance off target?

Reception attendance is an area of concern for the Behaviour and Attendance Support Service (BASS) as this is not in line with the excellent performance in other age groups.

Attendance at reception is not statutory until the child turns 5 years of age, so this can make it challenging for the BAAS and schools to raise attendance in this year group as there are no enforcement measures that can be taken.

The approach taken by the BASS is to engage with families early and to promote a 'Ready for School' approach, which aims to reassure and support parents into establishing regular attendance at school in reception and emphasising the benefits this has for the child's wellbeing.

What actions will be taken and who is doing this?

BASS will be mapping the sibling attendance of pupils with poor reception attendance to determine whether a whole family intervention would be appropriate.

The BASS are working with the Parent and Family Support Service to roll out the 'School Ready' project, which has been running for two years and has shown an average increase of 8% attendance in schools undertaking the project.


The Head of BASS will be consulting with head teachers whose schools have good


reception attendance, in this academic year (which starts in Q3), in order to provide good practice guidance on early school attendance to all schools.

When will performance be back on track?


It is anticipated that we will be able to meet the reception attendance target in the course of this academic year.


Strategic plan delivery

Strategic Plan activity		Note
Action 2.1 	Provide high quality training for staff working in social care and early help services. This training will need to link closely with the training goals of our partners & wherever possible, training should be delivered jointly to strengthen joint working.	We continue to develop a clear and strong brand for Tower Hamlets as a social work employer of choice following a recent Ofsted rating of 'Good' and seven nominations for national awards. We have put in place a revised learning and development offer along with clear career progression pathways, lower social worker caseloads and a restorative culture which will continue to build a strong brand image. We have offered restorative practice training to all the newly qualified social workers and implemented a training programme based on staff feedback from the training needs analysis undertaken, aimed at delivering a high quality joint social care training for staff working in children's social care services.
<i>Directorate</i>	<i>Lead Officer</i>	
Children and Culture Directorate	Richard Baldwin; Ronke Martins-Taylor	
<i>Portfolio Owners</i>	Cabinet Member for Children, Schools and Young People	We will be setting up a joint Learning and Development Steering group in November 2019, achieving economies of scale will be a key target for this group. Additionally, we are currently co-designing a training program that will be delivered by both staff within the Social Work Academy and Restorative Practice Champions in the teams for new recruits and partner agencies. We anticipate the operational date for in-house training to be in December 2019.


Strategic Plan activity		Note
Action 2.2 	Engage effectively with system partners such as health and the police to ensure that services are complementary and there is no duplication of services or resources.	We continue to collaborate with the Community Safety team in delivering a prevention and de-radicalisation training programme to improve the support provided by staff within Children's Services to victims at risk of radicalisation. We have also implemented a new exploitation screening tool within the Children Social Care case management system and the impact of this will be closely monitored over the coming months.
<i>Directorate</i>	<i>Lead Officer</i>	
Children and Culture	Richard Baldwin	We continue to offer and facilitate 'M-Pact' (moving parents and children together), an evidence based programme taking a whole family approach. We are currently working with


Directorate		families and supporting children impacted by parental substance misuse by providing a safe place for families to strengthen protective and resilience factors. Additionally, the 'First Step to Recovery' programme is being offered to expectant mothers or mothers with children under the age of five who are currently or have in the past misused drugs or alcohol. This is run on a weekly basis, in partnership with the specialist gateway midwifery service.
<i>Portfolio Owners</i>	Cabinet Member for Children, Schools and Young People	


<i>Strategic Plan activity</i>		<i>Note</i>
Action 2.3 	Create and map clear pathways into early help from social care and other universal services; and to develop consistent understanding of thresholds across services and agencies.	We have mapped and successfully reviewed existing and wider pathways into early help from children's social care. To develop consistent understanding of thresholds across services and agencies, we continue to offer workshop/surgeries for new social care staff members within the council and regular team meeting visits to children social care.
<i>Directorate</i>	<i>Lead Officer</i>	
Children and Culture Directorate	Richard Baldwin; Ronke Martins-Taylor	
<i>Portfolio Owners</i>	Cabinet Member for Children, Schools and Young People	

<i>Strategic Plan activity</i>		<i>Note</i>
Action 2.4 	Use the new Safeguarding Children Partnership to establish partnerships between children; young people; families and schools, health staff and other stakeholders.	The new Tower Hamlets Safeguarding Children Partnership was successfully launched in September 2019, and will be pivotal in establishing partnerships between children, young people, families and schools, health staff and other stakeholders.
<i>Directorate</i>	<i>Lead Officer</i>	Following the reorganisation of our Virtual School in Q1, we continue to embed a focus on improving outcomes for all vulnerable children through the facilitation and delivery of bespoke safeguarding training to schools and education settings at request and where the need is identified. Additionally, we have organised and facilitated termly Designated Safeguarding Leads for Schools and Education Settings Forum meetings and delivered presentations which are very well attended.
Children and Culture Directorate	Richard Baldwin; Ronke Martins-Taylor	
<i>Portfolio Owners</i>	Cabinet Member for Children, Schools and	

	Young People	
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<i>Strategic Plan activity</i>		<i>Note</i>
Action 2.5 	Continue to offer Family Group Conferencing to families in need at the earliest stage.	Throughout quarter two, we continued in our work to ensure that most family group conferences (FGCs) took place for children who are the subject of a child in need or child protection plan. We have engaged effectively with our Early Help partners so that FGCs are offered at an early stage and further work will be undertaken to promote and develop the Early Help family group conference model.
<i>Directorate</i>	<i>Lead Officer</i>	
Children and Culture Directorate	Richard Baldwin	
<i>Portfolio Owners</i>	Cabinet Member for Children, Schools and Young People	

<i>Strategic Plan activity</i>		<i>Note</i>
Action 2.6 	Collate data and feedback from children; young people; families and the wider community and further develop mechanisms for youth and parental voice.	We continue our work to collate data and feedback from children, young people and families through further engagements with schools and a number of focus groups, including that on the Special Educational Needs and Disabilities (SEND) services held for parents and carers of children and young people with SEND. We captured the voices of young people following the 'Good' Ofsted rating of Children Social Care and this was showcased in a video made available across the borough. Additionally, the 'Healthwatch – Young Influencers' who are a group of black and minority ethnic (BAME) young people living in Tower Hamlets conducted a series of mystery shopping exercises and review of services over the summer. The Young Mayor and his team also shadowed their respective cabinet members.
<i>Directorate</i>	<i>Lead Officer</i>	
Children and Culture Directorate	Richard Baldwin; Ronke Martins-Taylor	
<i>Portfolio Owners</i>	Cabinet Member for Children, Schools and Young People	

<i>Strategic Plan activity</i>		<i>Note</i>
Action 2.7 	Provide varied high quality activities outside of school for children and young people.	During quarter two, we successfully delivered a range of summer activities in parks. The Parks and Open Spaces Service has organised a total of 20 events and 63 special activities across 14 parks for children and families to date. Other activities and events were delivered by Sports and Physical Activity, Victoria Park and our Festivals and Events
<i>Directorate</i>	<i>Lead Officer</i>	

Children and Culture Directorate	Ronke Martins-Taylor; Judith St John	services.
<i>Portfolio Owners</i>	Cabinet Member for Children, Schools and Young People	<p>Additionally, our summer holiday scheme which provides childcare for children aged 3 to 13 years olds was rated 'Good' following an unannounced Ofsted inspection in the month of August. The inspection visit occurred on one of the busiest days of the summer programme as 230 children were attending the scheme, which also included two trips to the Mile End Water Festival and King Edward Memorial Park.</p> <p>We continue to work on the development of our youth hub provision for girls and this is on track.</p>

Outcome 3 People access joined-up services when they need them and feel healthier and more independent

We are committed to improving the health and wellbeing of our local population and the quality of the care services they receive. At the heart of this is ensuring our services are person centred, coordinated and make a tangible and positive difference to people's lives. We have a strong commitment to deliver in a joined-up way with a strong local Tower Hamlets focus, working in partnership with people and their communities, the voluntary and community sector and statutory providers. We aim to give the people of Tower Hamlets one of the best systems of interconnected health and care in the country.

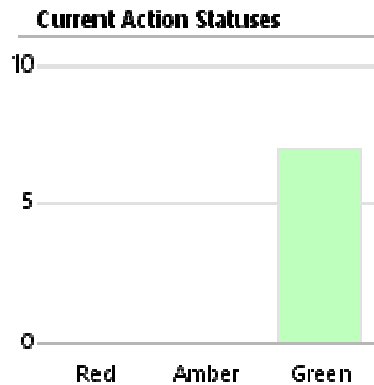
Through further close partnership working, prevention, early intervention and working with our communities, we will tackle health inequalities, improving the quality of life for our residents and managing demand for services.

Through the Tower Hamlets Together partnership with the NHS, we aim to reduce the need for people to be treated in hospital, by supporting them to stay healthy and to access support earlier to prevent health problems. We also want to give people more control over their own health and wellbeing and manage their health in community settings.

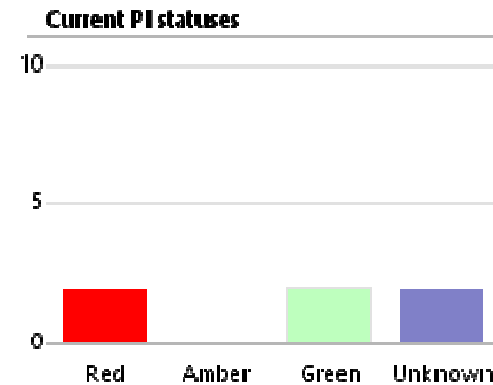
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Status summary for this strategic outcome

Strategic action status chart




Strategic measure status chart



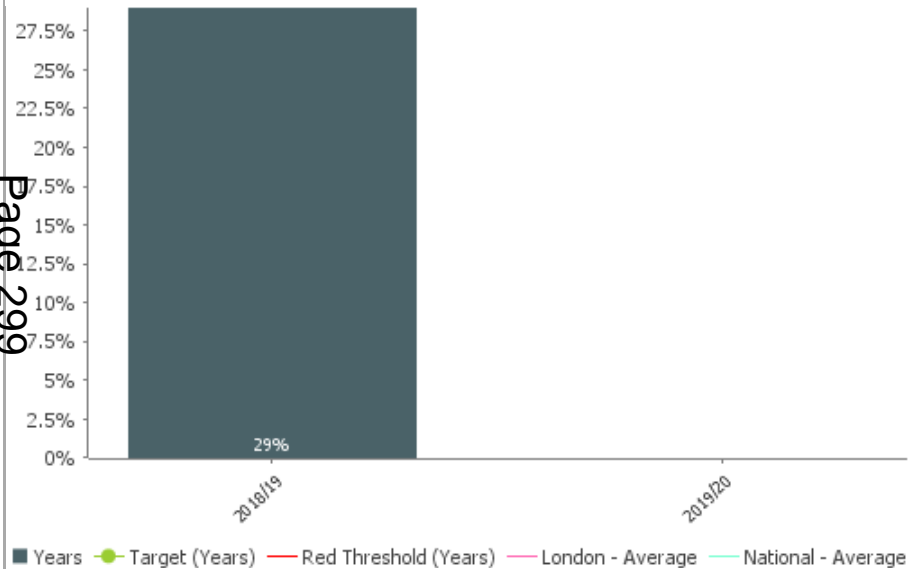
Residents' self-reported level of physical activity

This measure is taken from the council's residents' survey. It is expressed as the percentage of respondents who say that, on average, they complete over 150 minutes of physical activity and are therefore considered physically active in line with national guidance.

Lead member	Last update	Short term trend arrow	Long term trend (DOT)	
Cabinet Member for Adults, Health and Wellbeing Cabinet Member for Culture, Arts and Brexit	2018/19	?	?	
Lead officer	Type	Target	Actual	RAG rating
Director of Public Health Divisional Director, Sports, Leisure and Culture	Strategic		29%	 Data Only

Performance data trend chart

Latest note



This question was introduced in the 2018/19 residents' survey. Latest outturn relates to the Annual Resident Survey published in Summer 2019. The next survey is due to take place in early 2020 with results expected to be included in the end of year report for 2019/20.

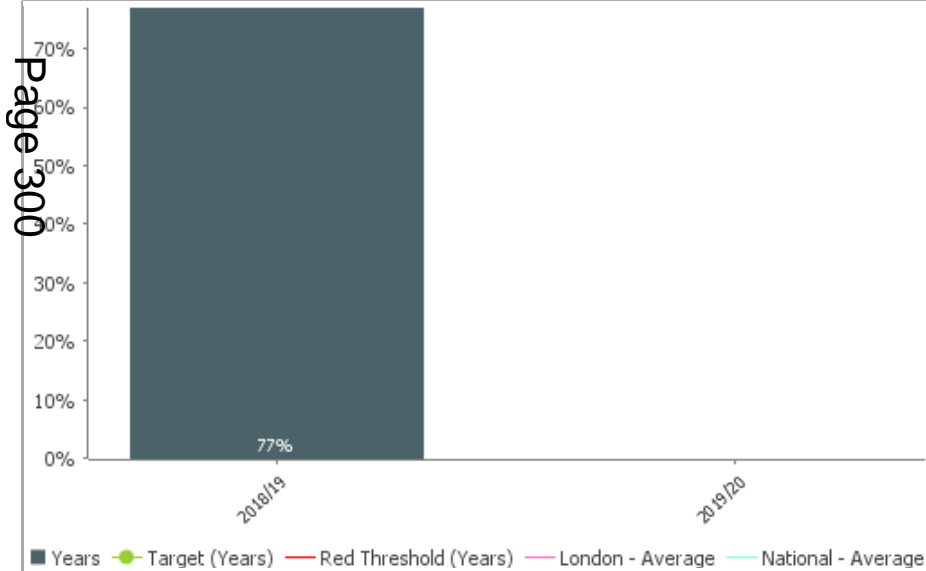


Residents' self-reported level of health

This measure is taken from the council's residents' survey. The result is expressed as the percentage of respondents who report their health as being 'very good' or 'good'.

Lead member	Last update	Short term trend arrow	Long term trend (DOT)
Cabinet Member for Adults, Health and Wellbeing	2018/19		
Lead officer	Type	Target	Actual
Director of Public Health	Strategic		77%
			Data Only

Performance data trend chart



Latest note

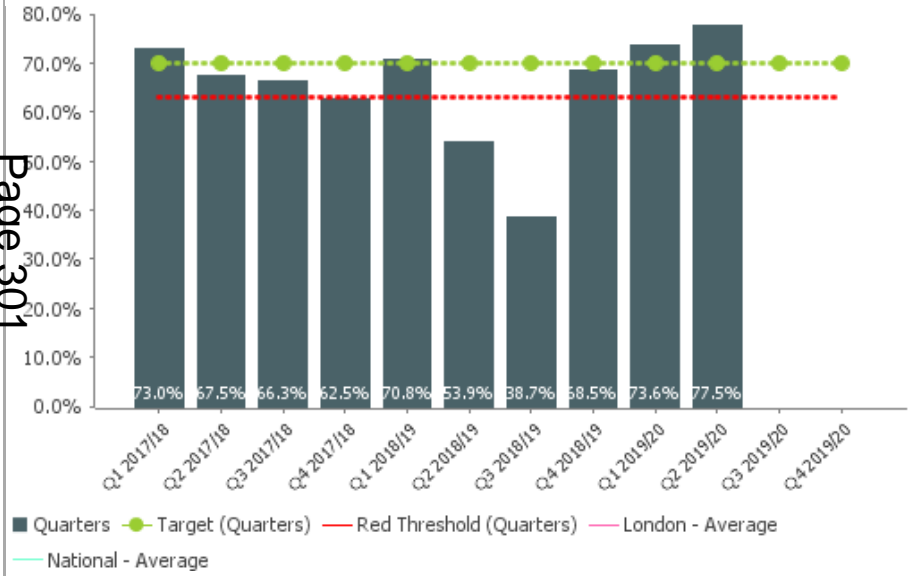
This question was introduced in the 2018/19 residents' survey. Latest outturn relates to the Annual Resident Survey published in Summer 2019. The next survey is due to take place in early 2020 with results expected to be included in the end of year report for 2019/20.

✓ People who are more independent after being supported through reablement services

Reablement is a short term service provided to people leaving hospital and is designed to enable them to remain more independent for longer. The measure reflects the proportion of new clients who required reduced support after reablement or who did not require any further support within the year.

<i>Lead member</i>	<i>Last update</i>		<i>Short term trend arrow</i>	<i>Long term trend (DOT)</i>
Cabinet Member for Adults, Health and Wellbeing	Q2 2019/20		↑	↑
<i>Lead officer</i>	<i>Type</i>	<i>Target</i>	<i>Actual</i>	<i>RAG rating</i>
Divisional Director, Adults Social Care	Strategic	70.0%	77.5%	✓ Green

Performance data trend chart



Latest note

The following case study demonstrates the difference our reablement support service makes to people's lives:

Mr P is 77 years old and was taken to hospital after being found wandering the community in an unkempt and confused state. He spent a month in hospital.

After being discharged from hospital, Mr P was referred to the Reablement Service. The aim was to help Mr P improve his diet, incorporating his preference to return to eating his main meal at his local cafe, and re-establishing a routine for managing his daily personal care.

At first this was challenging as Mr P has a substance dependency and poor mental health. He found it hard to engage, initially feeling the support offered was too intrusive. As a result, Mr P often missed the recommended four daily support visits.




Through listening to Mr P and understanding his aspirations, the Reablement officer visit times and input were re-arranged to support Mr P to continue to independently engage in meaningful, community based activities, resulting in improved engagement with the service to work towards his goals.

The help received from the service has meant that Mr P has now re-established an eating pattern of three meals a day, consistently completing his personal care and

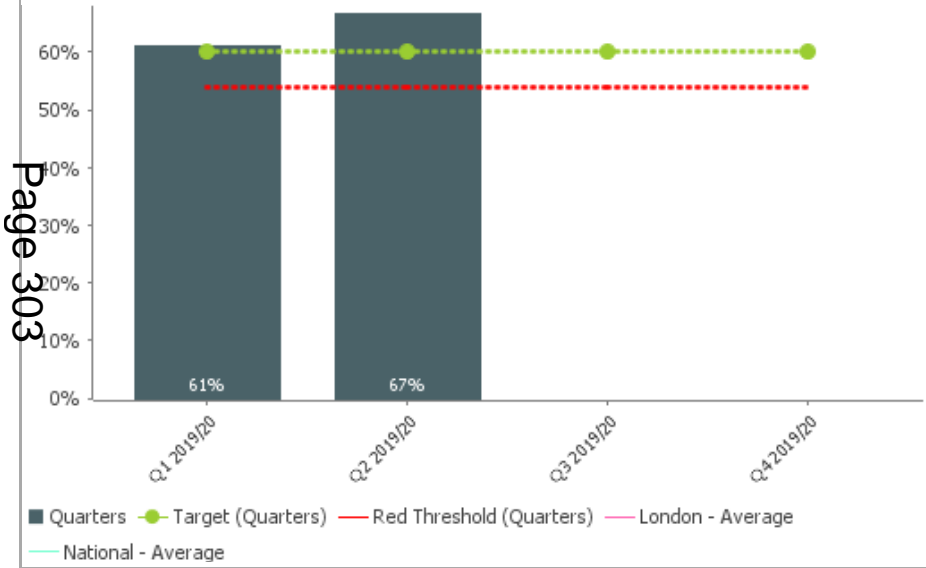
taking his medication with on-going support agreed with his GP. He is able to live in his own home and go to places he enjoys.

 **Children's participation in physical activity (Daily Mile)**

This indicator measures the percentage of primary schools in the borough participating in the national Daily Mile initiative to improve physical activity amongst children.

<i>Lead member</i>	<i>Last update</i>		<i>Short term trend arrow</i>	<i>Long term trend (DOT)</i>
Cabinet Member for Adults, Health and Wellbeing Cabinet Member for Culture, Arts and Brexit	Q2 2019/20			
<i>Lead officer</i>	<i>Type</i>	<i>Target</i>	<i>Actual</i>	<i>RAG rating</i>
Divisional Director, Education and Partnership	Strategic	60%	67%	 Green

Performance data trend chart *Latest note*



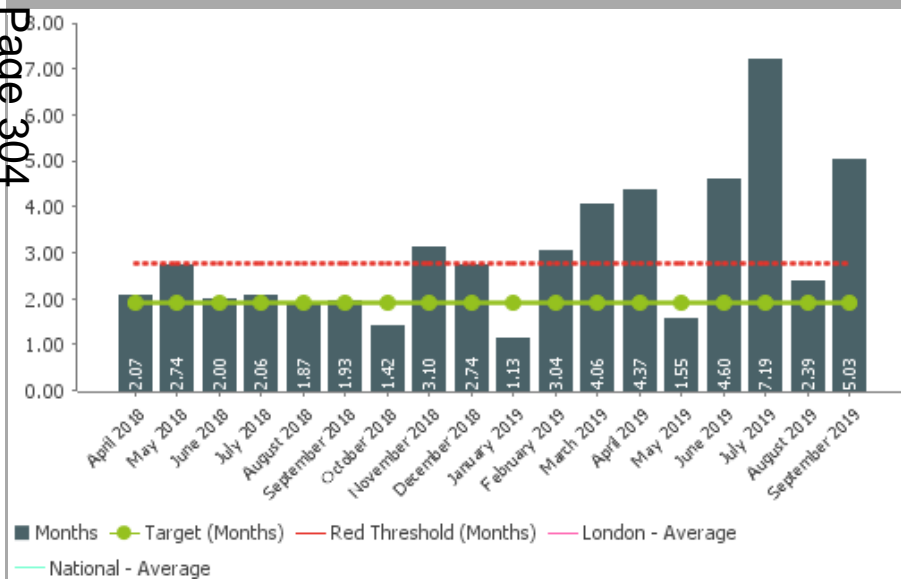
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Delayed discharges from hospital attributable to Council social care services

This measure gives the average daily number of beds in acute hospital care which are occupied by patients who are ready to be discharged but remain in hospital as it has not been possible to make appropriate social care arrangements for them. The measure is calculated monthly for the monthly only.

<i>Lead member</i>	<i>Last update</i>		<i>Short term trend arrow</i>	<i>Long term trend (DOT)</i>
Cabinet Member for Adults, Health and Wellbeing	Q2 2019/20		↓	↓
<i>Lead officer</i>	<i>Type</i>	<i>Target</i>	<i>Actual</i>	<i>RAG rating</i>
Divisional Director, Adults Social Care Divisional Director, Integrated Commissioning	Strategic	1.91	4.87	Red

Performance data trend chart



Latest note

Why is performance off target?

Timely transfers of care are critical to the smooth running of the hospital and the health and care system overall. The Royal London Hospital is frequently running at or near full capacity. Delays to discharge from hospital can occur at a number of stages in the patient pathway and the causes of delays are monitored. Issues relating to nursing and residential care admissions account for over 80% of the delays attributed to social care. The other main reasons for these delays are awaiting assessments or community equipment and adaptations. Numbers are small therefore a single case involving a prolonged hospital stay can have a significant impact on the overall performance level. Improving communication between hospital departments, adult social care teams and other partners involved in discharge planning is recognised as a contributory factor to improving performance. Performance on delays attributable to social care in Tower Hamlets is better than performance nationally. In September, 23% of delays locally were due to social care reasons compared to 30% for England as a whole.

What actions will be taken?

Plans are underway to conduct a review of the whole discharge pathway, with a specific focus on communication. This will specifically address

Mental Health delays; these are small in number but big on impact. A pioneering 'Home First' approach to hospital discharge, helping people to go home first pending assessment of their care and support needs is being implemented locally. This programme is being closely monitored to ensure that finding suitable homes and carrying out assessments is not unnecessarily delaying people from coming out of hospital.

When will it be back on track and who is responsible?

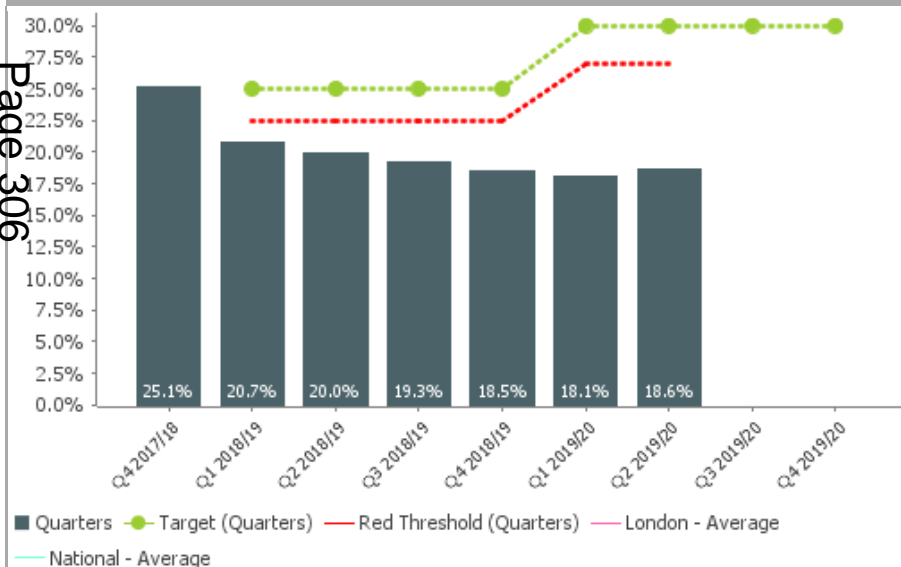
It is difficult to predict when performance will improve, particularly given that winter pressures may impact on hospitals over the winter. However we are confident that the measures in place will deliver improved performance by the end of Quarter 4 2019/20. Our Adult Social Care service leads on this in partnership with colleagues in Integrated Commissioning and the NHS.

Proportion of adult social care users who are receiving a direct payment

Direct payments enable service users to structure and buy their own care and support through a budget allocated to them. This measure is the current percentage of adult social care service users who are receiving their community-based care in the form of a direct payment.

Lead member	Last update		Short term trend arrow	Long term trend (DOT)
Cabinet Member for Adults, Health and Wellbeing	Q2 2019/20		↑	↓
Lead officer	Type	Target	Actual	RAG rating
Divisional Director, Adults Social Care	Strategic	30.0%	18.6%	Red

Performance data trend chart



Latest note

Why is Performance off target?

18.6% of adult social care service users currently have Direct Payments in place which is substantially less than the target rate (30%). Throughout quarter 2 we have seen a small but sustained increase each month in the numbers of people assessed for and using Direct Payments. As of the end of quarter 2 (September 2019), there are 542 active DP users; this is the highest number since June 2018.

Performance is off target for a number of reasons. There is a knock on effect as a result of not meeting last year's target (25%) and due to the extensive developments required to embed DPs and deliver them in a supportive way to service users. Getting Direct Payments set up right so that they can be used effectively, flexibly and simply by people takes time and involves extensive preparatory work, striking a balance between making processes simple and managing risks effectively. Our ambition is to make Direct Payments the default offer for as many people who are eligible for Social Care Services as possible. We therefore set a stretching target; higher than the one for the previous year as a way of challenging ourselves to galvanise our efforts.

In 2018/19 we refreshed the Direct Payments policy, commissioned a new direct payment support service provider and developed new systems paving the way for the introduction of prepaid cards, designed to make DPs less onerous for people. These actions took longer to complete than anticipated which has led to slippage. Contributing factors include:

- The transition of providers proved challenging. This resulted in a slower start than anticipated, including dealing with an inherited backlog of cases that has now been dealt with.
- Extensive review and refresh of policies and procedures due to the implementation of prepaid cards and charging.
- Giving enough time to ensure that staff are fully trained and confident competent in offering direct payments to our service users.

What actions will be taken?



For the remainder of this year we will be furthering our efforts to increase the uptake of Direct Payments. The new Direct Payment Policy is live and aims to give adult social care users more choice, control, creativity and flexibility in the care they receive. The refreshed Policy makes the management of Direct Payments easier. Starting from mid-October, Direct Payments will be the default offer for all new service users. We will start with setting up roughly 20 new service users in order to test the readiness of our systems and then roll out more extensively. Our direct payments support service will help with this. Later in the year we will extend the offer of Direct Payments to existing customers. Prepaid cards have been introduced and are being rolled out from late October. We have communicated this extensively to all adults social care staff, service users and partner organisations. We have set specific targets for all our Social Care Teams and are reviewing their performance against these goals regularly. We are also keeping a close eye on spend on Direct Payments to ensure funds are used effectively and appropriately.

When will performance be on track?


With the new implementations embedded and starting to have an impact, performance shows signs of improvement, with an expected increased take-up of Direct Payments by January 2020. We expect to see a significant improvement in our performance by the end of Quarter 3 and we predict that we will fully meet and exceed the target within 2020/21.


Who is responsible?

Strategic plan delivery


Strategic Plan activity		Note
Action 3.1 	Run activities and programmes that encourage residents to have healthy lifestyles, including encouraging children's healthy weight and nutrition	We continue to run a diverse range of inclusive programmes to promote healthy lifestyles, enabling residents from different backgrounds and with different needs to participate and improve their wellbeing. Amongst these are schemes specific to adults living with learning disabilities.
Directorate	Lead Officer	In quarter 2 we prioritised increasing the GP Register so that more people are known to services and able to access Health Checks. Health Checks are important in promoting healthy lives and identifying any conditions early. 75% of adults living with a learning disability in the borough have an annual health check. This is in line with national NHS targets.
Health, Adults and Communities Directorate	Somen Banerjee; Warwick Tomsett	
Portfolio Owners	Cabinet Member for Adults, Health and Wellbeing	
Strategic Plan activity		Note
Action 3.2 	Provide evidence-based early intervention and prevention programmes, helping residents to be as healthy as possible for as long as possible	Our Integrated Commissioning and Adult Social Care teams have a range of targeted programmes in place to address changing health and social care needs throughout the life course of residents.
Directorate	Lead Officer	Work continues to improve community engagement through the provision of Dementia cafes and a Dementia Friendly local action plan. Our 'Recovery and Employment' Hub helps people living with mental health conditions to sustain wellbeing and find jobs. During this quarter we have increased take up of Talking Therapies to tackle anxiety and depression. The service is now reaching 25% of the eligible local population.
Health, Adults and Communities Directorate	Somen Banerjee; Warwick Tomsett	
Portfolio Owners	Cabinet Member for Adults, Health and Wellbeing	
		We have developed and are currently testing a tool for health and social care staff to help them identify people for whom loneliness is an issue. This will help us target our services to reduce loneliness more effectively.


	<p>We have launched our enhanced health visiting service for families with more complex and higher needs. In addition, we have introduced a digital version of the Red Book, which is used by health visitors to record babies' and children's development. The new digital Red Book is another aspect of making our services digital by default.</p> <p>We have worked with our partners to refurbish the Ambrose King Centre (the sexual health service at the Royal London Hospital), providing a better environment for the users of a service that the council commissions from the NHS. Our service to help people stop using tobacco products exceeded its target, meaning more people are able to lead healthier and smoke free lives.</p>
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<i>Strategic Plan activity</i>		<i>Note</i>
Action 3.3 	Change how we provide information to residents on health and care, making it easier for people to get advice and help at an early stage	As part of our developing plans to re-commission our advice and information services, an Integrated Information and Advice Service model (joining up information and advice across health and social care) has now been developed with significant input from local residents whose views were sought in a series of co-production workshops that happened during the summer. Procurement for the information and advice service and advocacy service will begin later in 2019 and both on track to be operational in 2020.
<i>Directorate</i>	<i>Lead Officer</i>	
Health, Adults and Communities Directorate	Warwick Tomsett	
<i>Portfolio Owners</i>	Cabinet Member for Adults, Health and Wellbeing	


<i>Strategic Plan activity</i>		<i>Note</i>
Action 3.4 	Integrate health and care so that residents get a better, more joined-up experience of both systems	The Tower Hamlets Together Board continues to drive forward ambitious programmes of work towards seamless integration of health and social care services. This is a complex and long term issue. In September 2019, Cabinet approved our partnership agreement between the Council and East London Foundation Trust (ELFT), which gives a contractual basis to our joint commitment to share risk and pool budgets. This agreement integrates the funding and delivery of Mental Health and Learning Disability Services which will lead to cost savings and a better experience for our service users living with learning disability and mental health conditions.
<i>Directorate</i>	<i>Lead Officer</i>	
Health, Adults and Communities Directorate	Claudia Brown; Warwick Tomsett	
<i>Portfolio Owners</i>	Cabinet Member for Adults, Health and	

	Wellbeing	<p>At an operational adult social care level, the South East Locality is working on a Care Co-ordination 'Circle of Care' Project to strengthen a seamless provision of services.</p> <p>The evaluation report of first six months of our Acute Hospital Discharge Triage Pilot to September 2019 will be shared in quarter 4. This looked at how effectively hospital discharge, reablement and acute discharge co-ordinated and delivered a care package in the community following hospital admission. The findings will inform the development of a future model for short term support services. A development session in early August 2019 mapped out potential future models for integration between two service areas.</p>
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Strategic Plan activity		Note
Action 3.5 	Make better use of technology and equipment in health and care, recognising its potential to improve how people manage their health conditions and care needs	Our Adult Social Care service is investing in making better use of technology and equipment to help people manage their health conditions and care needs better. For instance, the New Independent Living Hub now has a senior Occupational Therapist, Equipment Officers, and two First Response Officers in post to assist and advise people on the technology most suited to their needs.
<i>Directorate</i>		<i>Lead Officer</i>
Health, Adults and Communities Directorate	Somen Banerjee; Claudia Brown; Warwick Tomsett	We have trained and accredited 15 staff members as Trusted Assessors. This will help to reduce the numbers and waiting times of people awaiting discharge from hospital and help them to move from hospital back home or to another setting. It will also improve how hospitals, primary and community care and local councils can work together to deliver trusted assessment as a key part of the High Impact Change Model, as set out in the NHS Five Year Forward View Next Steps.
<i>Portfolio Owners</i>	Cabinet Member for Adults, Health and Wellbeing	

Strategic Plan activity		Note
Action 3.6 	Staff in adult social care will do more to empower people, focusing on the strengths and abilities of social care users as well as the things they need help with	<p>We continue to deliver our programme to embed strength based approaches in Adult Social Care (ASC) practice. This enables us to better meet statutory requirements and best practice guidelines.</p> <p>London Adult Directors of Adult Social Services (ADASS) and Tower Hamlets Council co-hosted the inaugural Carers Festival celebrating the vital role of carers in supporting</p>
<i>Directorate</i>		<i>Lead Officer</i>

Health, Adults and Communities Directorate	Claudia Brown	<p>vulnerable people. Carers across the capital attended the event in September. We also held a social work conference in September with the purpose of embedding strength based, personalised approaches into practice.</p> <p>Our inaugural Practice Week in Adult Social Care is scheduled for week commencing 11th November 2019 to help those taking part to observe social work staff doing their jobs and provide feedback. During this week, a number of audits will also be undertaken to measure the quality of practice against a number of factors which demonstrate good practice. The objective of Practice Week is to enable reflection on the quality of practice and the service so that we can improve and develop, and enable better outcomes for service users and carers in the borough.</p>
<i>Portfolio Owners</i>	Cabinet Member for Adults, Health and Wellbeing	

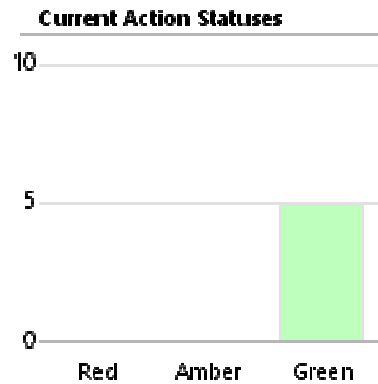
<i>Strategic Plan activity</i>		<i>Note</i>
Action 3.7  Page 312	Offer choice and personalised support to social care users, including the promotion of direct payments so that people have more control over the care they receive	<p>During this quarter we have ensured our plans are in place to maximise the roll out of Direct Payments to as many service users who would benefit from them as possible. Starting in October, Direct Payments will be the default offer to all new service users. Later in the year we will extend the offer of Direct Payments to existing customers. Prepaid cards have been introduced and are being rolled out from late October. We have communicated this extensively to all adults social care staff, service users and partner organisations.</p>
<i>Directorate</i>	<i>Lead Officer</i>	
Health, Adults and Communities Directorate	Claudia Brown	
<i>Portfolio Owners</i>	Cabinet Member for Adults, Health and Wellbeing	

Outcome 4 Inequality is reduced and people feel that they fairly share the benefits from growth

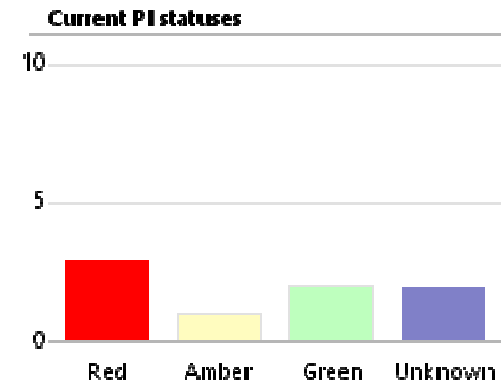
While we want people to have positive associations about life in Tower Hamlets, we cannot deny that Tower Hamlets is a borough of contradictions. Despite the economic opportunities in our borough, many in our community do not benefit from them. The borough is the tenth most deprived local authority in England and has the highest levels of pensioner poverty and child poverty in England. The employment rate of residents is below the national average and some people in our communities find it more difficult to find work than others.

Status summary for this strategic outcome

Strategic action status chart




Strategic measure status chart

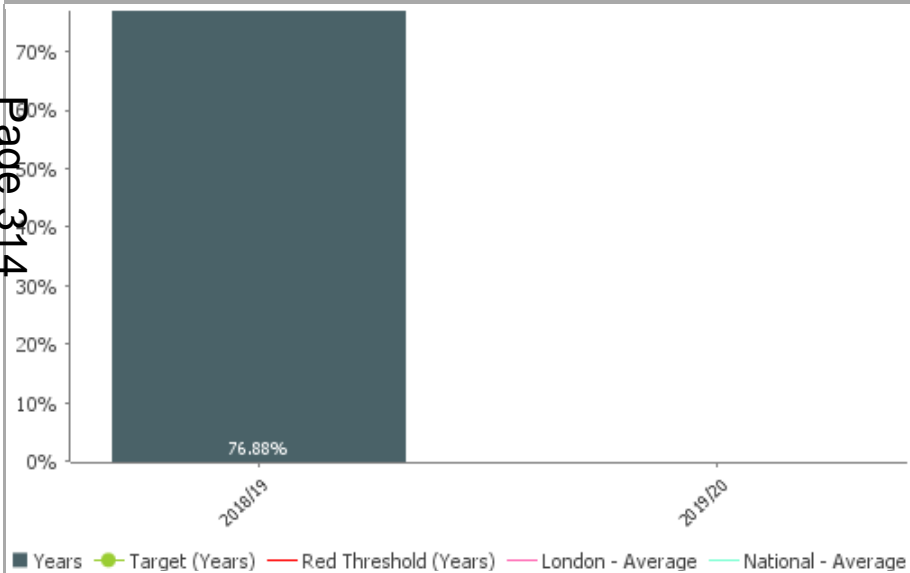


Residents' self-reported level of health for groups experiencing health inequalities - BAME residents

This measure is taken from the council's residents survey. The result is expressed as the percentage of respondents who report their health as being 'very good' or 'good'.

Lead member	Last update		Short term trend arrow	Long term trend (DOT)
Cabinet Member for Adults, Health and Wellbeing	2018/19		?	?
Lead officer	Type	Target	Actual	RAG rating
Director of Public Health	Strategic		76.88%	 Data Only

Performance data trend chart Latest note



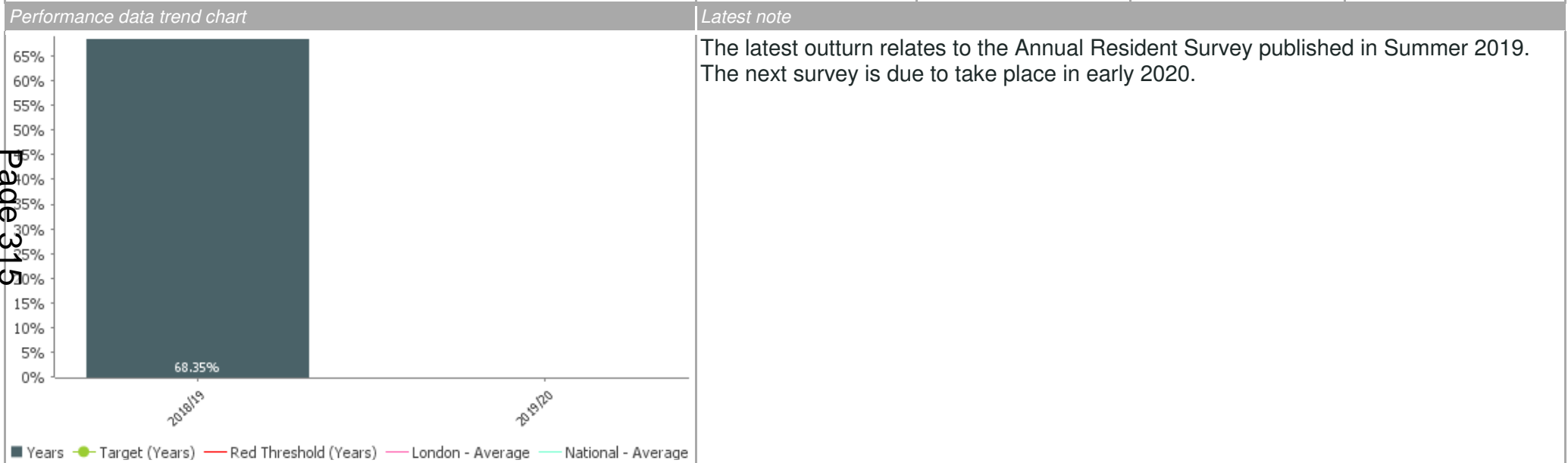
The latest outturn relates to the Annual Resident Survey published in Summer 2019. The next survey is due to take place in early 2020.



Residents' self-reported level of health for groups experiencing health inequalities - residents from C2, D, E socio-economic groups

This measure is taken from the council's residents survey. The result is expressed as the percentage of respondents who report their health as being 'very good' or 'good'.

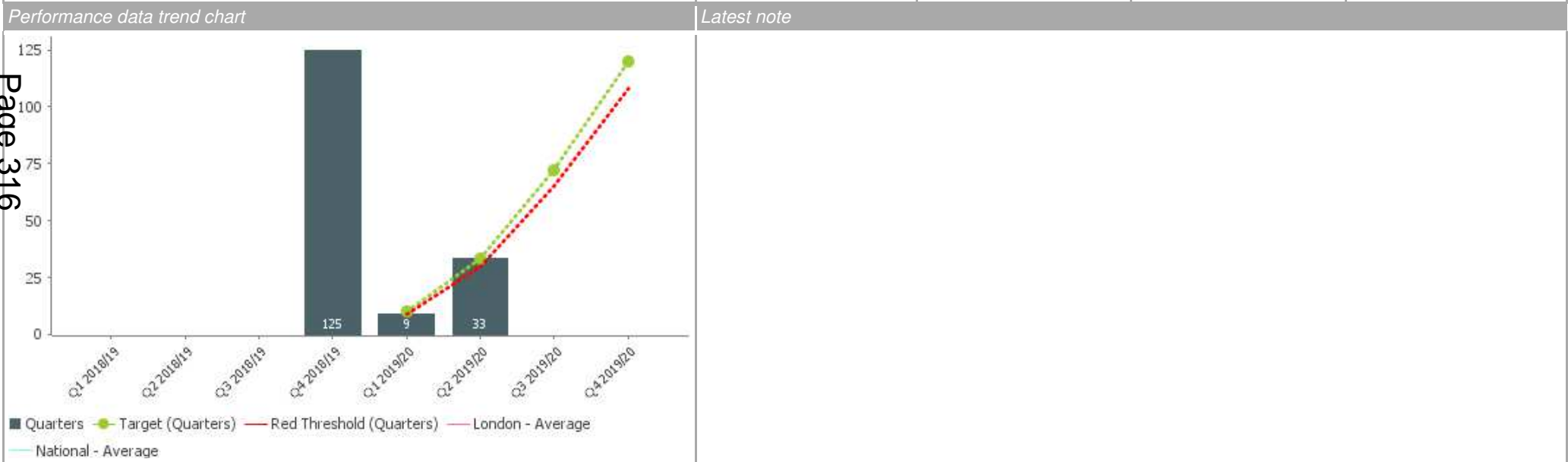
Lead member	Last update	Short term trend arrow	Long term trend (DOT)
Cabinet Member for Adults, Health and Wellbeing	2018/19		
Lead officer	Type	Target	Actual
Director of Public Health	Strategic		68.35%
			Data Only



✔ Number of residents who have disabilities supported into employment by the Workpath Service

This measure is a count of the number of residents who have a disability or health problem, who are supported into work through support from the council's WorkPath service. Measuring residents who have said they have health problems. Cumulative measure.

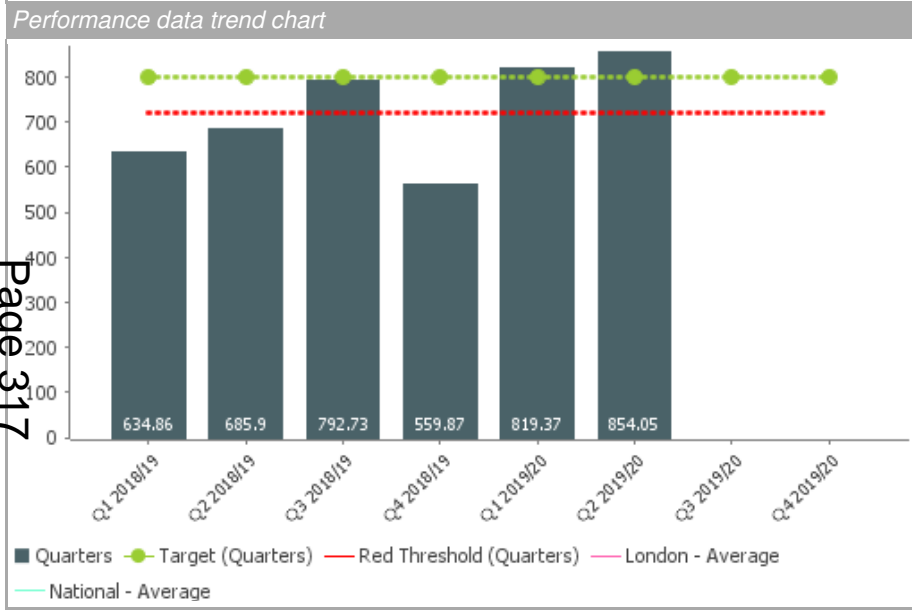
<i>Lead member</i>	<i>Last update</i>		<i>Short term trend arrow</i>	<i>Long term trend (DOT)</i>
Cabinet Member for Work and Economic Growth	Q2 2019/20		?	?
<i>Lead officer</i>	<i>Type</i>	<i>Target</i>	<i>Actual</i>	<i>RAG rating</i>
Divisional Director, Growth and Economic Development	Strategic	33	33	✔ Green



✔ Residents who are better off financially after receiving advice on maximising their household income

The expected annual increase in income of residents who have been supported to maximise their household income (£)

<i>Lead member</i>	<i>Last update</i>		<i>Short term trend arrow</i>	<i>Long term trend (DOT)</i>
Deputy Mayor for Planning, Air Quality and Tackling Poverty	Q2 2019/20		↑	↑
<i>Lead officer</i>	<i>Type</i>	<i>Target</i>	<i>Actual</i>	<i>RAG rating</i>
Divisional Director, Growth and Economic Development	Strategic	800	854.05	✔ Green



Latest note

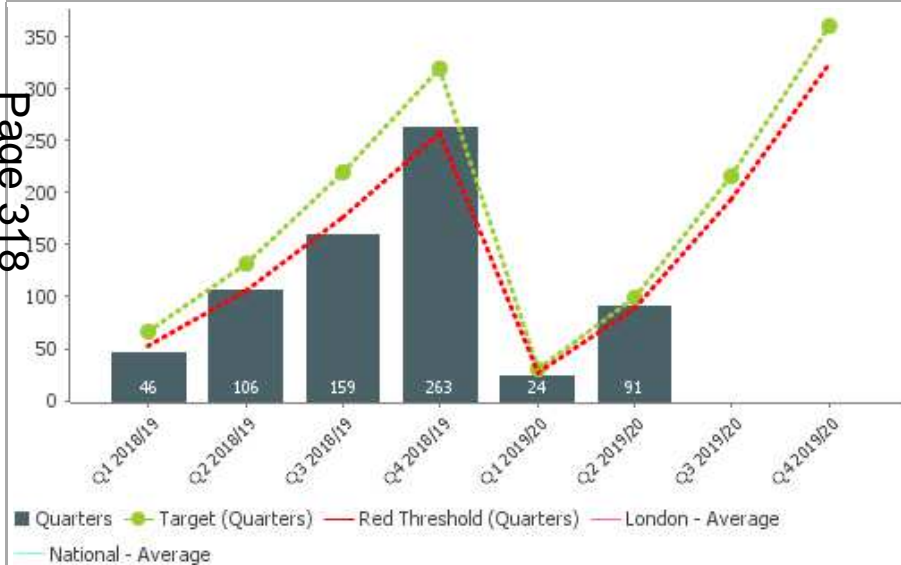
Between July and September 2019 a total of 5,536 clients were assisted through MSG-funded social welfare advice services. The actual amount backdated is £949,895. The increase in income is £3,778,127 (amount awarded going forward for 12 months). The total gain is therefore £4,438,022, equating to an average of £854.05 per outcome.

▲ Number of women supported into work by the WorkPath service

This measure is a count of the number of female residents supported into work through support from the council's WorkPath service. Cumulative measure.

<i>Lead member</i>	<i>Last update</i>		<i>Short term trend arrow</i>	<i>Long term trend (DOT)</i>
Cabinet Member for Work and Economic Growth	Q2 2019/20		▲	▲
<i>Lead officer</i>	<i>Type</i>	<i>Target</i>	<i>Actual</i>	<i>RAG rating</i>
Divisional Director, Growth and Economic Development	Strategic	99	91	▲ Amber

Performance data trend chart



Latest note

Why is performance off target?

The service has recently gone through a restructure and there are still some vacancies which means that there are fewer staff than expected at this point in time, to support residents into work. In addition, we are still gathering evidence of jobs secured from employers.

The council has recently brought forward our reporting schedule so that we can report our performance and delivery in a more timely fashion. For its measures, the WorkPath service relies on employers to confirm the employment status of the residents we have supported into work and this evidence can take some time to come through. For this reason it is sometimes necessary to adjust outturns over the coming month, as more evidence is received. This data is therefore provisional.

What actions will be taken and who is doing this?

The service recently hosted a jobs fair for local residents. It is expected that there will be a number of job outputs arising from this event. In addition to working with employers, we also work hard to make contact with residents that we have recently supported into jobs to persuade them to provide evidence of their employment status. Unfortunately some residents are unresponsive to these requests.

When will it be back on track?

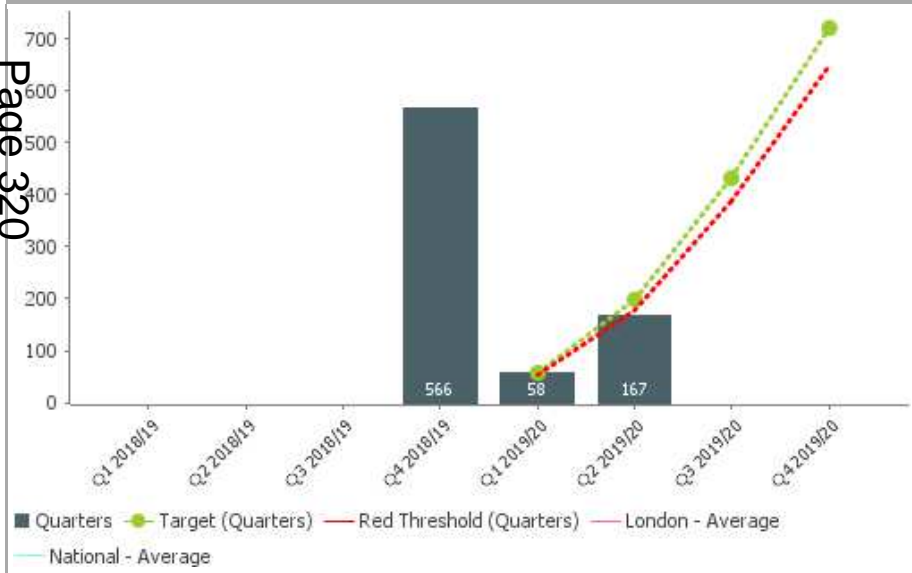
We expect performance to be back on track in the next quarter.

Number of residents who come from deprived postcodes supported into employment by the Workpath Service

This measure is a count of the number of residents from deprived postcodes supported into work through support from the council's WorkPath service. Deprived postcodes has been defined postcodes in the bottom 3 deciles according to the Index of Multiple Deprivation (IMD). Cumulative measure.

<i>Lead member</i>	<i>Last update</i>		<i>Short term trend arrow</i>	<i>Long term trend (DOT)</i>
Cabinet Member for Work and Economic Growth	Q2 2019/20		?	?
<i>Lead officer</i>	<i>Type</i>	<i>Target</i>	<i>Actual</i>	<i>RAG rating</i>
Divisional Director, Growth and Economic Development	Strategic	198	167	Red

Performance data trend chart Latest note



Why is performance off target?

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When will it be back on track?

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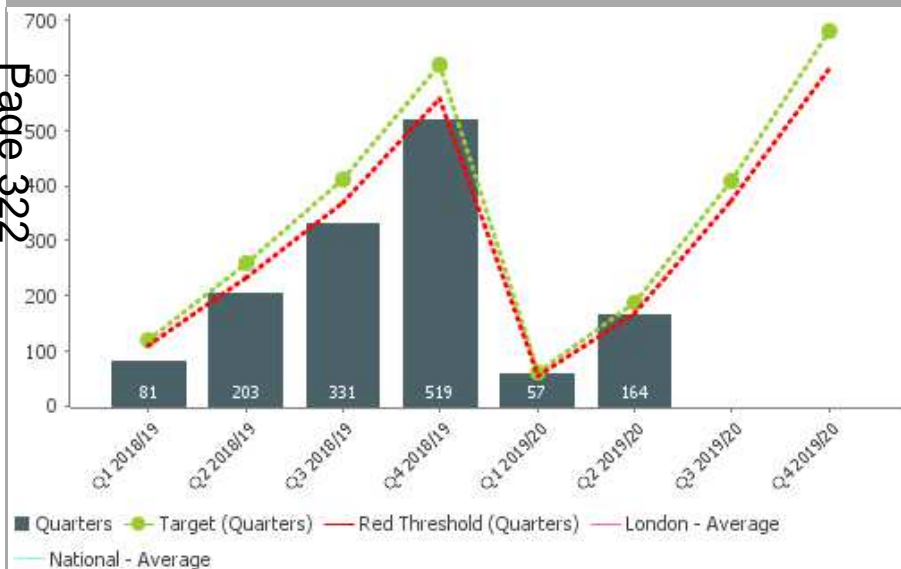
We expect performance to be back on track in the next quarter.

Number of residents from BAME backgrounds supported into work by the WorkPath service

This measure is a count of the number of residents from Black, Asian and minority ethnic (BAME) backgrounds supported into work through support from the council's WorkPath service. Cumulative measure.

<i>Lead member</i>	<i>Last update</i>		<i>Short term trend arrow</i>	<i>Long term trend (DOT)</i>
Cabinet Member for Work and Economic Growth	Q2 2019/20		↑	↓
<i>Lead officer</i>	<i>Type</i>	<i>Target</i>	<i>Actual</i>	<i>RAG rating</i>
Divisional Director, Growth and Economic Development	Strategic	187	164	Red

Performance data trend chart



Latest note

Why is performance off target?

The service has recently gone through a restructure and there are still some vacancies which means that there are fewer staff than expected at this point in time, to support residents into work. In addition, we are still gathering evidence of jobs secured from employers.

The council has recently brought forward our reporting schedule so that we can report our performance and delivery in a more timely fashion. For its measures, the WorkPath service relies on employers to confirm the employment status of the residents we have supported into work and this evidence can take some time to come through. For this reason it is sometimes necessary to adjust outturns over the coming month, as more evidence is received. This data is therefore provisional.

What actions will be taken and who is doing this?

The service recently hosted a jobs fair for local residents. It is expected that there will be a number of job outputs arising from this event. In addition to working with employers, we also work hard to make contact with residents that we have recently supported into jobs to persuade them to provide evidence of their employment status. Unfortunately some residents are unresponsive to these requests.

When will it be back on track?

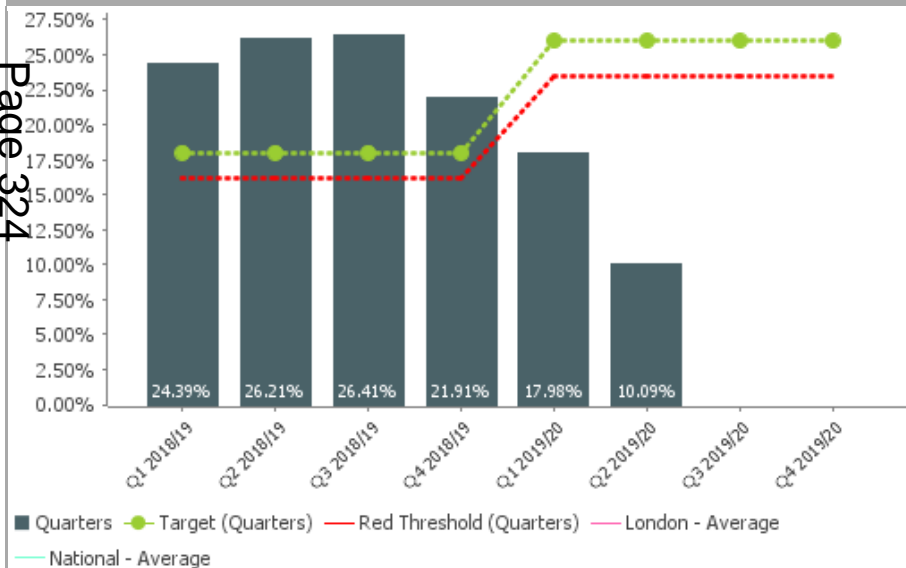
We expect performance to be back on track in the next quarter.

Households prevented from becoming homeless

Percentage of households whose homelessness was prevented or relieved via the Housing Options Service or through any funded initiative. Of the total number of homelessness approaches, the % awarded a prevention or relief duty. Cumulative measure. Based on statutory returns.

Lead member	Last update		Short term trend arrow	Long term trend (DOT)
Deputy Mayor for Housing (Statutory Deputy Mayor)	Q2 2019/20		↓	↓
Lead officer	Type	Target	Actual	RAG rating
Divisional Director, Housing	Strategic	26.00%	10.09%	Red

Performance data trend chart



Latest note

Why is performance off target?

This measure reports the proportion of households that have been prevented from becoming homeless and have had a Section 184 'prevention or relief outcome letter' served and case closed. This brings reporting on this measure in line with what is statutorily reported to the Ministry of Housing, Communities and Local Government (MHCLG). Performance is off target because there are still a number of prevention cases on record which have not yet been closed. We have a statutory target of 56 days to assess an application. There will be some applications therefore that will be resolved in the following month, however some will continue for longer, if prevention outcome is still being worked on and has not yet been achieved and the statutory measures not completed.


What actions will be taken and who will take them?


We have appointed some temporary staff to clear the backlog of closing cases and for us to be in a position to be able to complete assessments within 56 days, where possible. We are also training staff, reviewing our processes and monitoring our performance more closely. In addition, we are recruiting additional Tenancy Sustainment Officers; one to work with social landlords to prevent homelessness and two to work directly with clients and landlords in the private rented sector. We have also appointed a Visiting Officer whose aim is to strengthen preventions through mediation work with family and friends.

When will performance be back on track?


There are around a further 92 cases that have been prevented either through supported housing pathways or Housing Advice (privately rented accommodation sustainment) that have been prevented, but these have not yet been officially closed off on H-CLIC as not completed the legal statutory paperwork and steps required, so do not count in this reporting period. The performance from June onwards has shown an improvement. Housing Options are meeting with the landlords to discuss their performance, and will monitor performance during the year.

Strategic plan delivery


Strategic Plan activity		Note
Action 4.1 	Support households impacted by Universal Credit	<p>The following deliverables have been achieved to date:</p> <ul style="list-style-type: none"> • Total number of clients assisted to date from 15th October 18 = 711 • Number of matters dealt with = 1,585 • Total number of successful Discretionary Housing Payment applications = 19 • Total amount awarded from Discretionary Housing fund = £21,887 • Total number of Universal Credit applications made = 91 • Total amount of projected annual Universal Credit awarded where known as a result of the team's assistance = £843,303 • Total number of applications for a Crisis and Support = 15 <p>Our Benefits Service has reviewed its processes and procedures for Universal Credit to ensure residents are receiving their correct Universal Credit and Local Council Tax Reduction Scheme entitlement. We have also trained more of our Benefits Officers on Universal Credit claims processing to speed up delivery.</p>
Directorate	Lead Officer	
Place Directorate	Vicky Clark	
Portfolio Owners	Deputy Mayor for Planning, Air Quality and Tackling Poverty	

Strategic Plan activity		Note
Action 4.2 	Deliver initiatives to prevent homelessness and rough sleeping	<p>We have recently updated our Severe Weather Emergency Protocol relating to rough sleepers in preparation for winter. In partnership with St Mungos, we appointed a Complex Needs Health Coordinator to ensure partnership with health providers are providing equal and rapid access to health services to rough sleepers in the borough when needed. Our street based psychotherapist services have been commended by the Ministry of Housing, Communities and Local Government as an example of best practice.</p> <p>In line with government funding requirements we undertake monthly rough sleeper counts. In July the count was 16 and in September it was 18. These numbers are significantly lower</p>
Directorate	Lead Officer	
Place Directorate	Karen Swift	
Portfolio Owners	Deputy Mayor for Housing (Statutory Deputy Mayor)	

than our neighbouring boroughs, demonstrating that our services aimed at supporting individuals away from the streets are working. A further count will take place on 28th November.

<i>Strategic Plan activity</i>		<i>Note</i>
Action 4.3 	Work with partners to deliver initiatives to tackle poverty	<p>We have been selected as one of four Local Authorities in England to work with the Children’s Society on a three year project to co-ordinate crisis support in the borough. Our pension credit take up campaign has led to an increase of 38 households now claiming pension credit. Activities to alleviate holiday hunger have taken place across the summer in a variety of locations including schools, leisure centres and the Idea Stores.</p> <p>We have produced a report outlining the impact of Universal Credit on Tower Hamlets residents. The report is being officially launched as part of Challenge Poverty Week in October at an event at Toynbee Hall. The report, in conjunction with the GLA, looks specifically at the impacts of families with children.</p> <p>We will be starting our boiler replacement programme in October. This programme is targeted at low income and vulnerable households and will deliver energy costs savings and help to alleviate fuel poverty and reduce carbon emissions. We also run a fuel switching programme three times a year aimed at helping households find cheaper energy suppliers via a reverse style energy auction. Last quarter's switch saw residents benefit from an average annual saving of £212. The next energy auction will be held towards the end of 2019.</p>
<i>Directorate</i>	<i>Lead Officer</i>	
Place Directorate	Vicky Clark	
<i>Portfolio Owners</i>	Deputy Mayor for Planning, Air Quality and Tackling Poverty	

<i>Strategic Plan activity</i>		<i>Note</i>
Action 4.4 	Develop Finance and Welfare advice provision in the borough	<p>We have redesigned our commissioned finance and welfare advice offer as part of our move from Mainstream Grants to Local Community Fund. The Local Community Fund awards were made in July and following representations confirmed in August. Funding under Theme 3 Advice and Information was awarded to a consortium to deliver ‘Advice Tower Hamlets’. This service is led by Citizens Advice Tower Hamlets, in partnership with twelve local advice agencies. The funding agreement is being prepared with a service start due in October.</p>
<i>Directorate</i>	<i>Lead Officer</i>	
Place Directorate	Vicky Clark	
<i>Portfolio Owners</i>	Deputy Mayor for Planning, Air Quality and Tackling Poverty	

<i>Strategic Plan activity</i>		<i>Note</i>
Action 4.5 	Review and improve local childcare offer	<p>We have delivered and will continue to deliver Special Educational Needs and Disabilities training for Inclusion Co-ordinators in Private, Voluntary and Independent early years settings to ensure that young children with SEND receive the best and most appropriate support as early as possible. Through children's centres we now work in partnership with health services to ensure support for SEND starts before conception and continues for as long as the family attends. We are working in partnership with the SEND Parent Ambassadors to deliver sessions on parental experiences of SEND processes and practice in order to raise practitioner awareness and share information and knowledge of supporting children with additional needs.</p> <p>We are also working to improve the visibility of our local childcare offer by making it easier for parents and carers to find out through our website what provision is available in their area and what additional support they may be entitled to. We have increased the number of childcare places available to children eligible for 2, 3 and 4 year old funding through the expansion of existing childcare providers and supporting new providers from initial interest through to registration. We continue to work with all childcare providers to develop the quality of their care and education programmes resulting now in 96% of them with a "Good" or "Outstanding" Ofsted judgement.</p>
<i>Directorate</i>	<i>Lead Officer</i>	
Children and Culture Directorate	Christine McInnes	
<i>Portfolio Owners</i>	Cabinet Member for Children, Schools and Young People	

Outcome 5 People live in a borough that is clean and green

We want residents to enjoy a good quality of life in an environment that has a positive influence on everyone's health and wellbeing. To achieve this we must take further strides to improve air quality, reduce carbon emissions, tackle fuel poverty and become a more environmentally sustainable and attractive borough. Poor air quality causes 9,500 early deaths in London every year. In our borough, air quality is primarily affected by traffic fumes and construction. We are committed to improving local air quality by implementing the actions set out in our Air Quality Action Plan.

A new Transport Strategy for the borough will improve transport options and reducing the impacts of traffic on our residents, making our borough one of the best in London for walking or cycling. Through our planning policy we will work to ensure major developments progress towards achieving zero carbon status, and the council's assets and housing stock is being made ever more energy efficient.

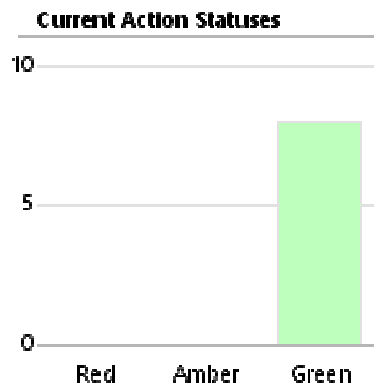
We want the borough to be a clean and attractive place but litter, fly tipping and graffiti on our streets has a detrimental impact on life for residents and visitors. We will tackle these through more efficient and effective services, backed up with investment and enforcement when necessary.

We are committed to improving our recycling rates over the next four years and want to reduce the overall amount of waste produced, at the same time ensuring convenience and value for money in the way that our waste is collected and managed. A new strategic approach for waste management will boost recycling of waste from all sources, including on housing estates, and we will work to achieve zero waste for the borough's markets.

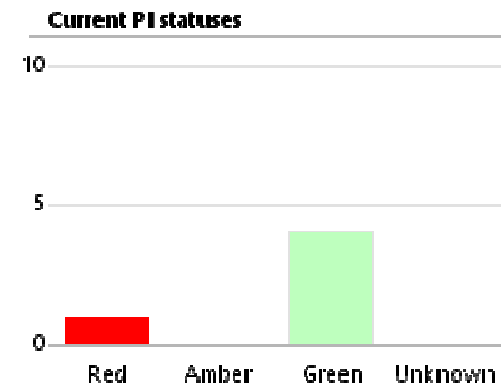
We are committed to protecting and maintaining our parks and open spaces and the council will continue to invest in the public realm to create attractive, liveable, well-maintained neighbourhoods.

Status summary for this strategic outcome

Strategic action status chart



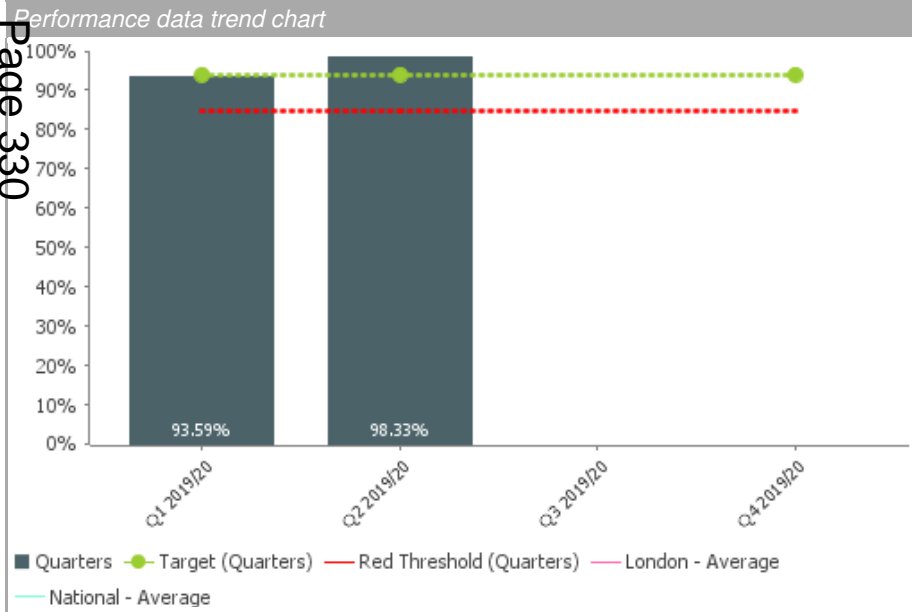
Strategic measure status chart



✓ Level of public realm cleanliness

This measure is based on a national methodology to assess the cleanliness of streets and the public realm relating to litter. Surveys of a sample of areas are carried out monthly across the borough. Results of all the surveys will be combined to get the annual result. Areas are scored against a national benchmark of cleanliness levels for litter, and the measure is expressed as the percentage of areas surveyed which meet or exceed the cleanliness standard.

Lead member	Last update		Short term trend arrow	Long term trend (DOT)
Cabinet Member for Environment	Q2 2019/20		↑	↑
Lead officer	Type	Target	Actual	RAG rating
Divisional Director, Public Realm Business Manager Operational Services	Strategic	94%	98.33%	✓ Green



Latest note

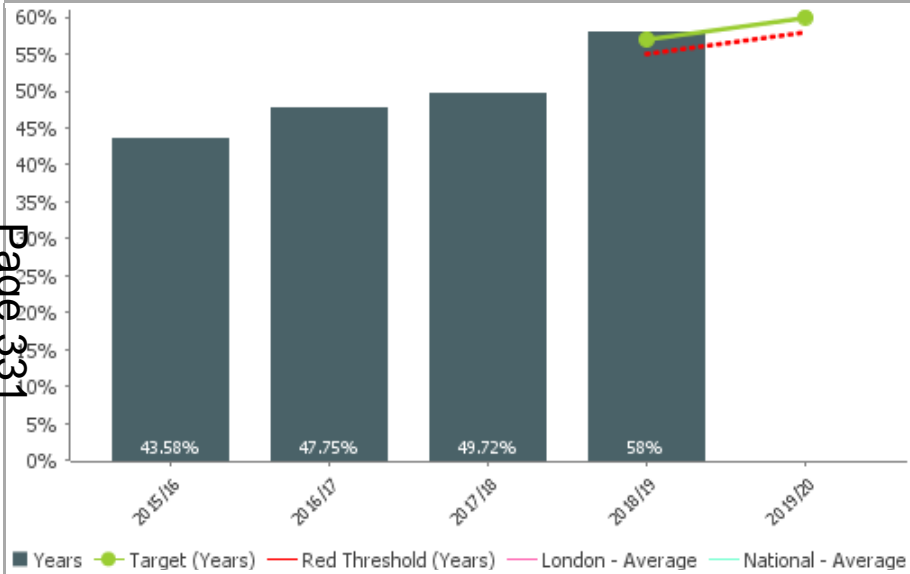
✓ Level of CO2 emissions generated by the Council's activities

Level of CO2 emissions generated by council activities (measuring % reduction from the baseline)

<i>Lead member</i>	<i>Last update</i>		<i>Short term trend arrow</i>	<i>Long term trend (DOT)</i>
Cabinet Member for Environment	2018/19		↑	↑
<i>Lead officer</i>	<i>Type</i>	<i>Target</i>	<i>Actual</i>	<i>RAG rating</i>
Divisional Director, Housing	Strategic	57%	58%	✓ Green

Performance data trend chart

Latest note



2019/20 data will be available after March 2020.

The CO2 emissions outturn for 2018/19 has recently been produced. Emissions of 7,377 t CO2 are an 18% reduction on last year's emissions and a 58% reduction on emissions from 2007. The council looks on course to not only meet but exceed the overall reduction target of 60% by 2020/21. Contributing to this reduction is our retrofit and maintenance projects which are improving the energy efficiency in our buildings. There has been a decrease in emissions from our and our waste and recycling contractor's fleet.

The Sustainable Development Team is responsible for leading the programme to reduce emissions in Tower Hamlets. The plan for doing this is set out in the Carbon Management Plan. In March 2019 the council declared a Climate Emergency and committed to becoming net zero carbon by 2025. A plan on how this target will be achieved is currently being drawn up for publication by January 2020.

✓ Primary school pupils benefiting from a school street at their school

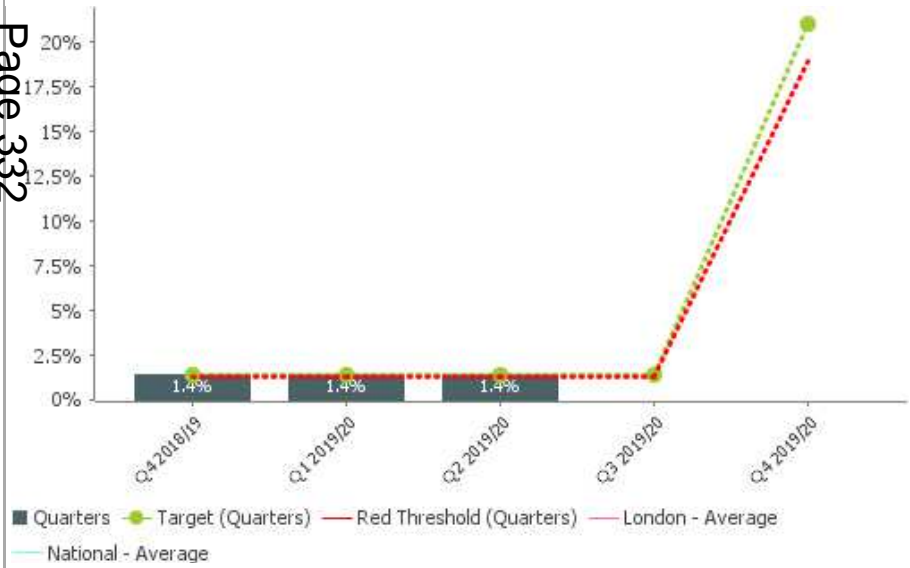
Streets around schools are often dominated by idling cars and speeding traffic at drop-off and pick-up times, resulting in air pollution and an environment that is generally unpleasant for walking and cycling. The numerator for this measure is the number of primary aged pupils who go to a school where a school street has been applied.

<i>Lead member</i>	<i>Last update</i>		<i>Short term trend arrow</i>	<i>Long term trend (DOT)</i>
Executive Mayor	Q2 2019/20		▬	▬
<i>Lead officer</i>	<i>Type</i>	<i>Target</i>	<i>Actual</i>	<i>RAG rating</i>
Divisional Director, Public Realm	Strategic	1.4%	1.4%	✓ Green

Performance data trend chart

Latest note

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The service has profiled 21 primary schools to be fitted with a school street by Sept 2020, and by the end of 2020/21 all 50 school streets are profiled to be completed.

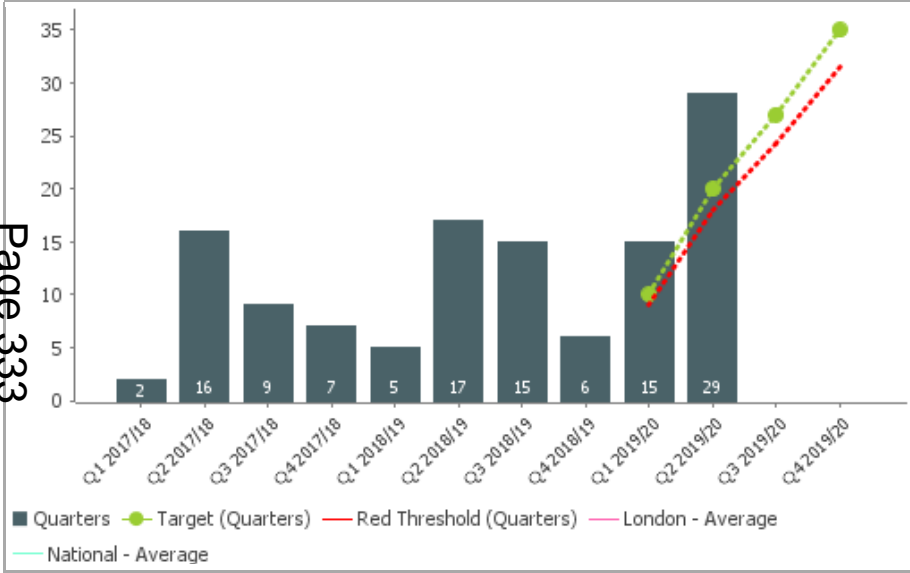
Ten primary schools will be fitted with a school street by the end of this financial year (2019/20). Works are due to start in Q4. The proportion of primary school aged children that will benefit from a school street by March 2020 is just under 21%.

✓ Residents' access to nature through biodiversity projects

No. of biodiversity enhancement projects involving the community

<i>Lead member</i>	<i>Last update</i>		<i>Short term trend arrow</i>	<i>Long term trend (DOT)</i>
Cabinet Member for Environment	Q2 2019/20		↑	↑
<i>Lead officer</i>	<i>Type</i>	<i>Target</i>	<i>Actual</i>	<i>RAG rating</i>
Divisional Director, Housing	Strategic	20	29	✓ Green

Performance data trend chart *Latest note*



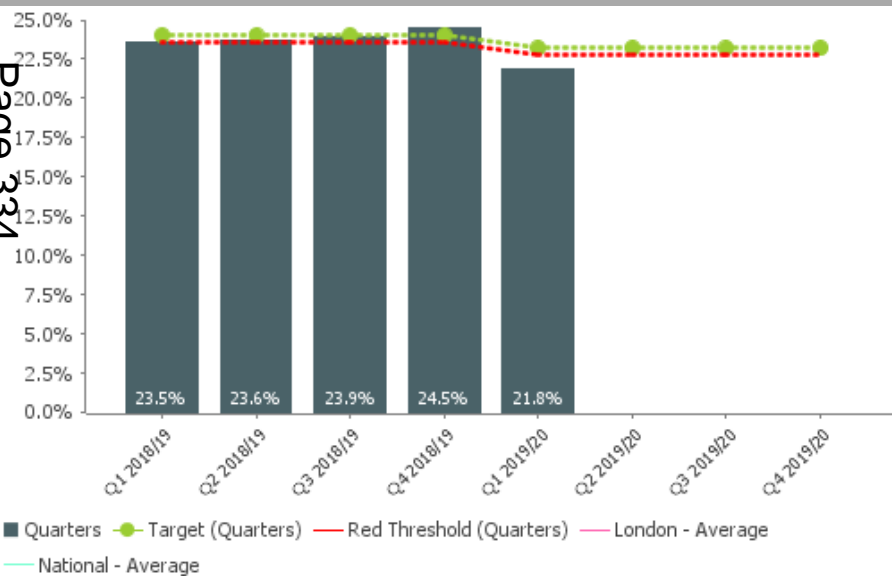
29 biodiversity projects delivered so far this year.

Level of household recycling (Quarterly Audited)

The measure looks at the percentage of household waste which is sent for reuse, recycling and composting. The end of year figure is based on the cumulative totals for the whole year while quarterly figures relate to performance in the quarter only.

<i>Lead member</i>	<i>Last update</i>		<i>Short term trend arrow</i>	<i>Long term trend (DOT)</i>
Cabinet Member for Environment	Q1 2019/20		↓	↓
<i>Lead officer</i>	<i>Type</i>	<i>Target</i>	<i>Actual</i>	<i>RAG rating</i>
Divisional Director, Public Realm	Strategic	23.2%	21.8%	Red

Performance data trend chart



Latest note

Why is performance off target?

The latest available audited data related to Q1 of 2019/20. In Q1 18,465 tonnes of household waste were collected, and of that, 4,003 tonnes was sent for reuse, recycling and composting. Performance for the period is just 1.4 percentage points below our target.

Performance is off target because we have not collected the quantity or quality of recycling material that we had expected. Increasing participation in recycling is the most important factor in improving performance of this measure, followed by reducing contamination in recycling bins.

What actions will be taken and who is doing this?

Our Waste Strategy identifies our priorities to improve recycling performance which include service re-design, improving service delivery, and improving our communications with residents and landlords to drive behaviour change.


We have recently completely rescheduled our collection rounds with the aim of making the service more efficient and reliable for customers. In addition, we are continuing to make improvements to the waste and recycling bins of approximately 2,200 blocks of flats in the borough, to ensure there are the number and combination appropriate to the needs of residents.


We are also currently trialling a range of initiatives to improve recycling on estates in the borough, and we are waiting to hear the results of a pan-London research project into improving recycling on estates. We will look at best practice findings from both of these and work with our landlord partners to roll these out borough-wide.

When will it be back on track?


We expect to see an improvement in performance recycling levels as the revised collection rounds settle in and the improvements to the recycling arrangements on housing estates are established which is likely to be in the next financial year.


Strategic plan delivery


Strategic Plan activity		Note
Action 5.1 	Implement new arrangements to improve cleansing and the quality of the local environment	Our eighth Big Clean Up saw residents and community groups lending a hand to help us clean up four areas in the borough (Capgemini between Limehouse Basin and Victoria Park; Good Gym with Barts Volunteers in the John Harrison Garden at the Royal London Hospital; Plastic Free Roman Road and Queen Mary University of London in Meath Gardens; and EY in Chrisp Street Market).
Directorate	Lead Officer	
Place Directorate	Dan Jones	
Portfolio Owners	Cabinet Member for Environment	


Strategic Plan activity		Note
Action 5.2 	Deliver the Council's Waste Strategy with initiatives to encourage/enforce waste reduction and recycling amongst residents and businesses	<p>In September we celebrated Recycling Week by organising a day of sustainability action. As well as stalls and workshops in Globe Town Market Square, there was a Big Clean Up litter pick in Meath Gardens. Events included a 'Nature Meets Waste' workshop where children from Rachel Keeling Nursery were encouraged to create pieces of art from litter and natural materials found in the park. We also attended an assembly and two interactive workshops at Mayflower School to promote waste minimisation, recycling and litter issues, and we are currently engaging with other schools to deliver similar there.</p> <p>We are investigating different ways to increase the recycling rate in the borough. We are planning to introduce a pilot recycling incentive scheme to encourage residents to recycle more. We are in the process of procuring this work. Working with our Town Centres Team and with local independent cafes in the borough, we have developed a pilot project relating to re-usable cups which is due to be launched at the end of October.</p> <p>So that we can provide a better food waste and recycling service in flatted properties in the borough, we are reviewing examples of good practice in other local authorities. We aim to pilot our findings in September 2020.</p>
Directorate	Lead Officer	
Place Directorate	Dan Jones	
Portfolio Owners	Cabinet Member for Environment	


Strategic Plan activity	Note
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Action 5.3 	Deliver the Mayor's ambitious Love Your Neighbourhood programme to make our streets safer, cleaner and more sociable places to use and to deliver the new investment around street lighting, footways and carriageways throughout the borough	<p>We recently concluded a public consultation on the Tower Hamlets Transport Strategy 2019-2041. The new Strategy sets out plans to promote walking and cycling to help meet the Mayor of London's target that 90% of all trips in the borough should be made on foot, by cycle or by using public transport by 2041.</p> <p>As part of this pledge, we are planning to invest almost £16m on a carriageway and footway resurfacing programme. Approximately £3.2m of planned schemes have been committed to date. The schemes in the programme have been prioritised according to condition survey findings and the roads/footways with the worst condition have been prioritised for improvement within the programme.</p> <p>We have started work on 21 School streets around primary schools throughout the borough to reduce traffic levels at the school gate and make it healthier for pupils to walk to school and breathe cleaner air.</p>
<i>Directorate</i>	<i>Lead Officer</i>	
Place Directorate	Dan Jones	
<i>Portfolio Owners</i>	Cabinet Member for Environment; Executive Mayor	

<i>Strategic Plan activity</i>		<i>Note</i>
Action 5.4 	Deliver initiatives to maintain and improve existing parks and green spaces	<p>We have continued work to improve our parks and open spaces. At Bartlett Park we have now closed Cottal Street to extend the park down to the canal and our designers are working on the detail for the new inclusive play area. We will be opening improved areas of the park in phases and expect to complete all work by February. At Allen Gardens we have recently consulted on plans to integrate Buxton Street into the park and provide a more pleasant area for people walking and cycling. Once we understand the outcome of the highways consultation we will update our plans for Allen Gardens.</p> <p>We have also completed improvement to multi-use games areas and tennis courts at Whitehorse Road, Wapping Gardens. In September, Cabinet approved investment in a number of parks across the borough.</p> <p>The Mayor has recently approved a £1m tree planting programme over the next three years. 333 trees will be planted in 2019/20 starting in the planting season (November). All sites have been identified and surveyed in preparation. A further 333 trees will be planted in the 2020/21 planting season and a final 333 trees in 2021/22.</p>
<i>Directorate</i>	<i>Lead Officer</i>	
Children and Culture Directorate; Place Directorate	Dan Jones; Judith St John	
<i>Portfolio Owners</i>	Cabinet Member for Culture, Arts and Brexit; Cabinet Member for Environment	

Strategic Plan activity		Note
Action 5.5 	Deliver the Air Quality Action Plan	<p>We are rolling out more air quality monitors and they are being installed within our Liveable Streets areas. Two monitors for the Liveable Streets areas are at the Coborn Road/Tredegar Road junction and Tredegar Road/Fairfield Road junction. We will be buying and installing more before Christmas. In July we recorded 450 separate charging activities on our rapid charge points currently installed which has grown steadily from 50 in February 2019.</p> <p>As part of our Liveable Streets programme, we are reviewing the location of sites for installing car bike ports in Wapping, Bethnal Green and Bow. We are also installing an additional 100 on-street cycle hangars in the borough.</p>
Directorate	Lead Officer	
Place Directorate	Dan Jones	
Portfolio Owners	Deputy Mayor for Planning, Air Quality and Tackling Poverty	

Strategic Plan activity		Note
Action 5.6 	Promote use of cleaner fuel types amongst residents and businesses	<p>We want to ensure that small and medium sized enterprises (SMEs) operating in our borough are informed and prepared for the impacts the 2021 expansion of the Ultra-Low Emission Zone (ULEZ) may have on their businesses. With our partners in Haringey, Hackney and Islington, we are bidding for £4m (across four boroughs) to deliver a SME cleaner vehicle support programme to run for three years from 2020/21. By supporting SMEs vehicles to be compliant with the Ultra-Low Emissions Zone (ULEZ), we will contribute towards a better air quality environment for Tower Hamlets.</p> <p>We are also planning to train 500 mechanics across the four authorities – upskilling them to be able to work on electric vehicles.</p> <p>We have now installed 32 electric vehicle charging points and are working to deliver at least 100 by March 2020. After that, we will install 100 per year in 2020/21 and 2021/22.</p>
Directorate	Lead Officer	
Place Directorate	Dan Jones	
Portfolio Owners	Deputy Mayor for Planning, Air Quality and Tackling Poverty	

Strategic Plan activity		Note
Action 5.7 	Take targeted action to reduce CO2 emissions across residential and community buildings	<p>Since April 2009 we have been implementing a carbon management plan and are on track to deliver a 60% reduction in carbon emissions against the 2007 baseline in 2020/21.</p> <p>At the beginning of the year, we committed to spend £1.7m from the Carbon Fund to deliver</p>
Directorate	Lead Officer	

Place Directorate	Karen Swift	more energy efficiency and carbon reduction projects.
<i>Portfolio Owners</i>	Cabinet Member for Environment	<p>The small and medium enterprise (SME) Energy Improvement Grants Programme has now awarded 15 grants totalling £64k of which £20k has been paid out for completed projects. These 15 projects will achieve carbon reductions of 61 tonnes.</p> <p>Approval from the Grants Determination Committee was given in September 2019 to deliver our Schools Energy Retrofit Programme and delivery of this will begin in October 2019. This will see at least 8 schools receiving grants to carry out energy retrofit projects.</p> <p>The Residential Boiler Replacement Programme will also commence delivery in October 2019. In preparation we have made residents aware of the programme and have already taken over 30 phone calls from interested residents that will be able to benefit from the programme when delivery commences.</p>

<i>Strategic Plan activity</i>		<i>Note</i>
Action 5.8	Agree and deliver a Biodiversity Action Plan to protect and enhance wildlife across the borough	<p>The new Local Biodiversity Action Plan (LBAP) was adopted by Cabinet at the end of July. The new Plan will be launched by the Mayor in Victoria Park in October. So far this year 34 biodiversity enhancement projects that contribute to LBAP objectives have been completed by the council and its partners, including 29 involving the community. These, along with 10 completed developments, have created or enhanced over 1.6 hectares of priority habitat at ground level, and installed over 9,000 square metres of biodiverse green roofs. So far in quarter 2 eight biodiversity enhancement projects involving the community have been delivered. These are:</p> <ul style="list-style-type: none"> • Approach Gardens additional ponds • Swedenborg Gardens mound grassland enhancement • Scrapyard Meadow chalk banks summer 2019 • Swedenborg Gardens south bulb planting 2018-19 • Ackroyd Drive Green Link - Cowslip Meadow chalk bank • Sanctuary Wood enhancements, Tower Hamlets Cemetery Park • Greening the Tarling West Estate
<i>Directorate</i>	<i>Lead Officer</i>	
Place Directorate	Karen Swift	
<i>Portfolio Owners</i>	Cabinet Member for Environment	

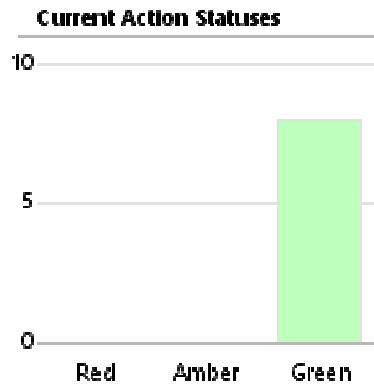
- Greening Tom Thumb's Arch, Malmesbury Estate

Outcome 6 People live in good quality affordable homes and well-designed neighbourhoods

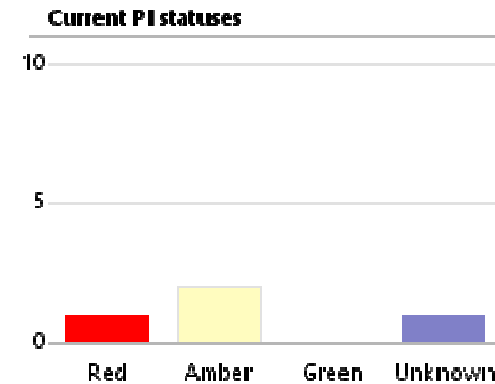
We want the borough to be a place where people are proud to live and enjoy their lives. Accessing good quality, affordable housing is an ongoing challenge in a borough which has a fast growing population, low income levels for many households and a fast growing private rented sector with high private rents and house prices. Maximising the delivery of affordable homes and improving the quality and management across all housing tenures is therefore paramount. We will continue to increase the supply and delivery of affordable homes by building new council housing, supporting the delivery of new housing at affordable rent levels by registered providers, and maximising the number of affordable homes secured through the planning process. We will continue to drive up the quality of housing across all tenures, including the private sector, through increased licensing and enforcement, and will improve standards across social housing through stronger management. We will refresh our approach to Regeneration, including environmental improvements, across the borough; continuing our programme of estate regeneration and delivering the Better Neighbourhoods Programme, so that growth across the borough is coordinated and shaped in such a way that everyone shares the benefits.

Status summary for this strategic outcome

Strategic action status chart



Strategic measure status chart





Residents' satisfaction with the area

This measure is taken from the council's residents' survey and is expressed as the percentage of respondents who are very / fairly satisfied with the local area as a place to live.

Lead member	Last update	Short term trend arrow	Long term trend (DOT)
Deputy Mayor for Planning, Air Quality and Tackling Poverty	2018/19	↓	↓
Lead officer	Type	Target	Actual
Divisional Director, Public Realm Divisional Director, Planning and Building Control	Strategic		70.0%
			RAG rating Data Only

Performance data trend chart



Latest note

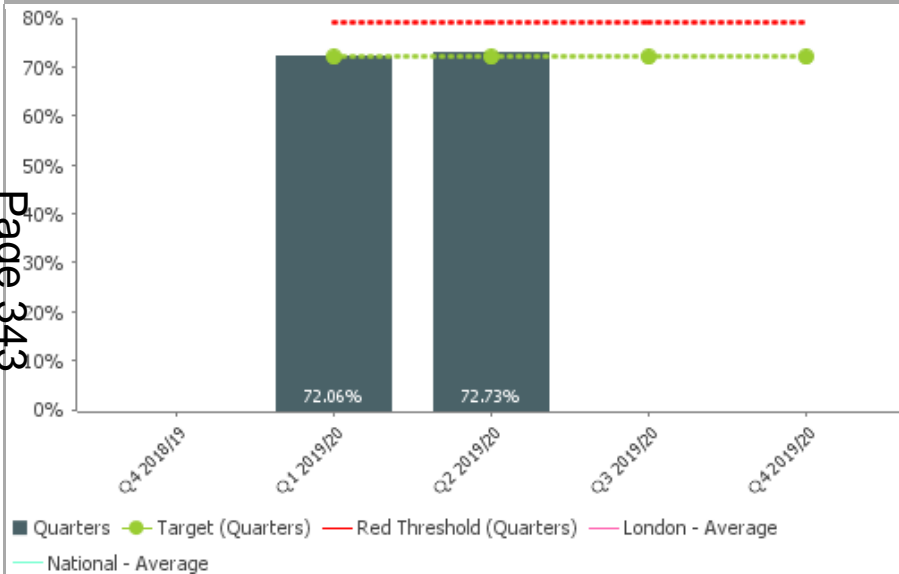
Latest outturn relates to the Annual Resident Survey published in Summer 2019. The next survey is due to take place in early 2020 with results expected to be included in the end of year report for 2019/20.

▲ Level of household overcrowding

Overcrowding remains a problem in the borough and reducing overcrowding is a main aim of the council's housing service. This measure calculates the percentage of households on the common housing register (in Bands 1&2 but excluding homeless households) who are living in overcrowded conditions.

Lead member	Last update		Short term trend arrow	Long term trend (DOT)
Deputy Mayor for Housing (Statutory Deputy Mayor)	Q2 2019/20		↓	↓
Lead officer	Type	Target	Actual	RAG rating
Divisional Director, Housing	Strategic	72%	72.73%	▲ Amber

Performance data trend chart



Latest note

Why is performance off target?

Target is based on overall number of applicants in band 1 and 2 that are overcrowded (excluding homeless). Excluding homeless households, there are 11,654 households in bands 1 and 2 and 8,476 of these households are living in overcrowded conditions.

The Council gives high priority to overcrowded applicants but under choice based lettings has very little influence over what applicants bid for. Any bids made need to be considered against other priorities and targets of the council e.g. lets to homeless applicants and decanting blocks for regenerations.

Furthermore, the council under the Allocations scheme has no control over who applies to join the housing register or applicants' personal housing circumstances other than to consider cases in accordance with the published allocations scheme. This means that although overcrowded applicants are being rehoused into suitable accommodation, more applicants are joining all the time as explained above.

What actions are being taken to bring performance back on target?

Officers will continue to work closely with partner Registered Providers, and offer applicants information on how to resolve their housing and maximising housing opportunities available to them including mutual exchange, private rented sector and housing moves.

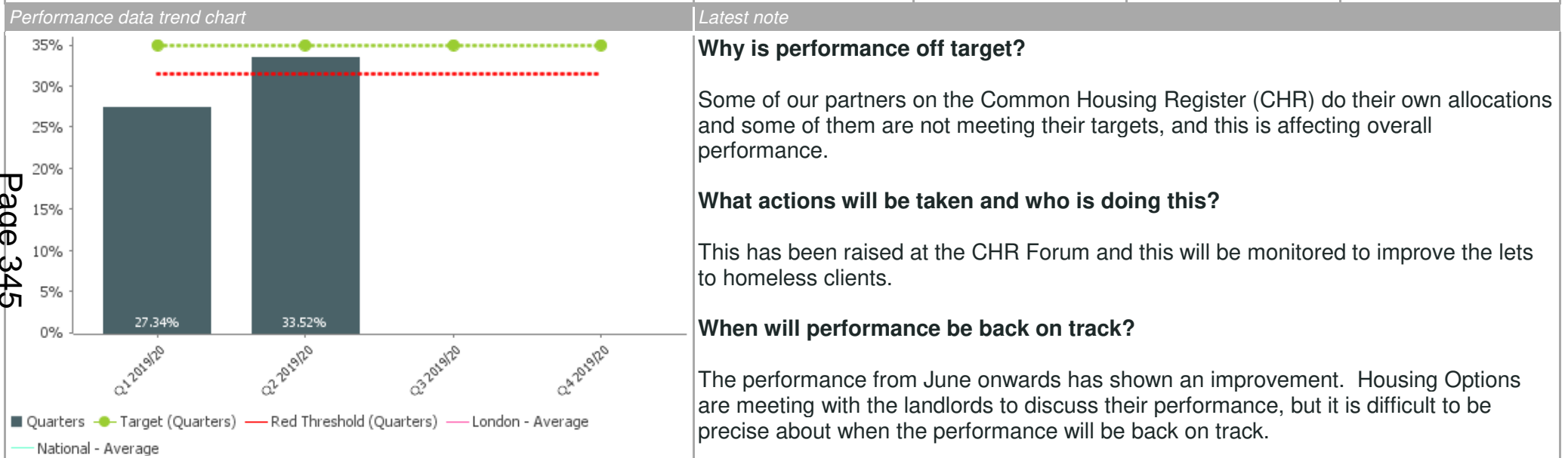
Who is responsible for bringing performance back on target and by when?

Our Advertising and Lettings Team Manager is closely monitoring to ensure allocations to overcrowded applicants are maximised, but as explained even if number of lets are increased the council has no control over how many more join.

▲ Homeless households moved into permanent accommodation

Moving residents out of temporary accommodation and into permanent homes is a priority for the council. This indicator measures the proportion of all lets in the reporting period (accommodation of two bedrooms or more) which were made to homeless households.

Lead member	Last update		Short term trend arrow	Long term trend (DOT)
Deputy Mayor for Housing (Statutory Deputy Mayor)	Q2 2019/20		▲	▲
Lead officer	Type	Target	Actual	RAG rating
Divisional Director, Housing	Strategic	35%	33.52%	▲ Amber



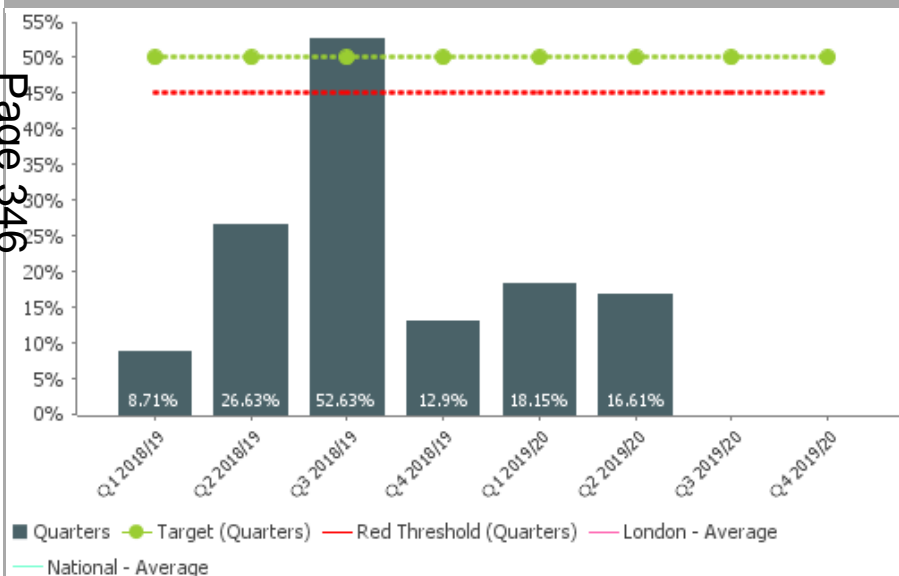
Level of affordable homes completed

Percentage of completed homes that are classed as affordable

<i>Lead member</i>	<i>Last update</i>		<i>Short term trend arrow</i>	<i>Long term trend (DOT)</i>
Deputy Mayor for Housing (Statutory Deputy Mayor) Deputy Mayor for Planning, Air Quality and Tackling Poverty	Q2 2019/20		↓	↓
<i>Lead officer</i>	<i>Type</i>	<i>Target</i>	<i>Actual</i>	<i>RAG rating</i>
Divisional Director, Housing	Strategic	50%	16.61%	Red

Performance data trend chart

Latest note



Why is performance off target?

51 affordable units have been recorded on the LDD Database as being delivered so far this year, out of a total of 307 homes completed. Nine homes were recorded as having been completed between July-September, though none of them were affordable. The council does not currently lead the construction of most residential development in the borough so if the private sector or RPs are not completing units then figures will most likely be off target.

This year, this measure is reporting the percentage of affordable homes delivered as recorded on the GLA's London Development Database (LDD) rather than by using data gathered from registered social landlords. In order to record delivery on the LDD, a Completion Certificate needs to be issued by either an Approved Inspector or LBTH Building Control. There is typically a time lag between onsite inspection and the issue of certificates. There is no obligation on external Approved Inspectors to promptly issue certificates in relation to schemes where they are the appointed authority. So whilst last year's method of recording delivery was slightly timelier, our recorded delivery now mirrors what is officially and publically reported through the LDD.

What actions will be taken and who is doing this?

Development can be implemented up to three years after a planning permission has been granted. Over the last three years since October 2016, the Council has granted

344 planning permissions for residential development. Of these, there are 252 live permissions where there is currently no indication of commencement or completion.

There are no actions that the Council's planning service can take to directly influence developer or RP construction programme timetables. However there may be opportunities to map out stalled or un-commenced sites and utilise existing links with RP partners in particular understand blockages to delivery. The Council could also consider increasing the purchase of affordable housing secured as planning obligations on developer-led schemes. Bench-marking delivery against the situation in other comparable local authorities would also help to improve the Council's intelligence around housing delivery.

Checks were undertaken over the summer with relevant developers and external building inspectors to try and verify our data on their schemes. This improves our understanding of the commencement and completions status of each approved residential development. The current data held on our system reflects the outcome of these checks.

When will it be back on track?


We will work with private developers and RPs to ensure our housing forecasts are as accurate as possible.


Note

Last year we reported the number of affordable homes completed, where the source was our own informal database, populated by information provided by Registered Providers. The number of affordable homes completed that we are aware of is 439 to date.


The level of affordable homes completed over the past three years ie. Q2 2016/17 through to Q1 2019/20 is 23.4% (completed units 7,277 of which 1,703 were affordable).


Strategic plan delivery


Strategic Plan activity		Note
Action 6.1 	Work with housing associations and other partners to improve the supply of affordable housing (note - this action also supports Outcome 4)	So far this year, 51 affordable units have been officially recorded on the LDD Database as being delivered, out of a total of 197 homes completed. However through contacting our housing providers partners, we are aware that there are 439 affordable housing homes that have been completed so far this year; these homes will appear on the LDD Database when official paperwork has been sent to the Council for processing. We have granted permissions for 561 affordable housing units as follows: Locksley Estate, Salmon Lane, 17; Birchdown, Denbury and Huntshaw, 18; Poplar Gas Works, Leven Road, 177; Strahan Road, 9; Safestore, 151; Reardon and Lowder, 18; Eric Estate infills, 99, Norman Grove, 17, St Paul's Way, 23 and Heylyn Square, 32. Of the above developments only, one is slightly short of our affordability policy of 35% of habitable rooms being affordable. Seven have achieved 100% affordability.
<i>Directorate</i>	<i>Lead Officer</i>	
Place Directorate	Karen Swift	
<i>Portfolio Owners</i>	Deputy Mayor for Housing (Statutory Deputy Mayor)	

Strategic Plan activity		Note
Action 6.2 	Identify sites for new council homes and commence delivery	We are progressing on delivering the Mayoral pledge to deliver 1,000 new council homes which will help to tackle the housing crisis in the borough. Since Q1, we have granted planning consent for the construction of a further 59 council homes. We are in the process of producing tender documentation so that we can procure contractors to start delivery. These homes will be delivered in Shetland Road, Strahan Road, St Paul's Way, Norman Grove, Mellish Street, and at Lowder House, Keats House, and Locksley D. We have started to consult with local residents on the development options for the Clichy Estate. We have set up a Resident Panel and we are appointing an Independent Resident Adviser. This development is expected to enable the delivery of an additional 250 new homes.
<i>Directorate</i>	<i>Lead Officer</i>	
Place Directorate	Alan Mccarthy	
<i>Portfolio Owners</i>	Deputy Mayor for Housing (Statutory Deputy Mayor)	

		<p>In the next couple of months, our contractors will be starting on site to build 65 new homes (53 new homes at Barnsley Street, 7 at Hanbury Street, and 5 at Sidney Street). The planning application for the development of 62 new council homes at Arnold Road will be considered in November, and in the next couple of months we expect planning applications to come in for the development of 124 new council homes (34 in Bancroft/Wickford Street, 15 in Waterloo Gardens, 38 in Tent Street, 30 in Yorkshire Road, and 7 adjacent to the Montefiore Centre).</p> <p>Sites have been identified for development of a further 250 new council homes and we are preparing concept designs ahead of community consultation. These will form part of the programme for the delivery of the first tranche of the second 1,000 council homes.</p>
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<i>Strategic Plan activity</i>		<i>Note</i>
Action 6.3 	Adopt the Local Plan and produce robust development strategies and policy guidance	The Planning Inspectorate issued their final report on our new Local Plan in September. We are now making some final minor amendments and we expect the Local Plan to be fully adopted by the council in January 2020. The new Community Infrastructure Levy (CIL) Charging Schedule was examined in public in August. We are still waiting for the final Examiner's Report, but anticipate adopting the new schedule by January 2020.
<i>Directorate</i>	<i>Lead Officer</i>	
Place Directorate	David Williams	
<i>Portfolio Owners</i>	Deputy Mayor for Planning, Air Quality and Tackling Poverty	


<i>Strategic Plan activity</i>		<i>Note</i>
Action 6.4 	Develop and deliver a borough programme for regeneration	We are currently working on a South Poplar Masterplan which will provide planning and design guidance for developments in the area, with a particular focus on connections over Aspen Way, and supporting economic growth and social integration. The next step is to produce a baseline urban analysis study which will help us to understand the existing infrastructure constraints and opportunities. This work is supported by Transport for London and the Greater London Authority.
<i>Directorate</i>	<i>Lead Officer</i>	
Place Directorate	Ann Sutcliffe	
<i>Portfolio Owners</i>	Deputy Mayor for Planning, Air Quality and Tackling Poverty; Executive Mayor	

<i>Strategic Plan activity</i>		<i>Note</i>
Action 6.5 	Deliver the Council's programme of estate renewal and initiatives to improve housing conditions (note - this action also supports Outcome 4)	So far this year we have spent c£10m of the £28.2m forecast spend on improvement works, including fire safety works. We have now completed improvements in 36 blocks, and we are currently working on a further 24 blocks. We have a budget of £4.7m to deliver fire safety improvements across 104 schemes. We have now developed a fire risk assessment policy which will inform our cycle of risk assessment on our housing stock. In Q2 we completed fire safety remedial works on six blocks on the Cranbrook Estate. We have also completed roof compartmentalisation safety work across the Avebury Estate. We are in the process of installing fire safety doors for 491 properties in 51 blocks across the borough. After each set of works we undertake another risk assessment to check that our works have improved the fire risk assessment score. We have almost completed the improvement work to Cuff and Dunmore Point, including asbestos surveys and removals, balcony repairs, new windows and doors, electrical testing and updating, fire safety works, internal decoration and repairs to the roof. We have now procured contractors to undertake improvement works at Malting and Brewster Houses and the Structural Risk Assessment for this work is now available to residents via our website.
<i>Directorate</i>	<i>Lead Officer</i>	
Place Directorate	Dan Jones; Karen Swift	
<i>Portfolio Owners</i>	Deputy Mayor for Housing (Statutory Deputy Mayor)	

<i>Strategic Plan activity</i>		<i>Note</i>
Action 6.6 	Negotiate and deliver strategic infrastructure	In July, Cabinet approved a number of Local Infrastructure Fund projects to commence delivery in 2019/20. The projects include 15 open space and public realm improvement projects nominated by the public as well as a programme to deliver longer term infrastructure in key growth areas of the borough that matches priorities identified by local people. Transport for London (TfL) have decided to review the options for crossing the Thames from Rotherhithe to Canary Wharf, postponing activity on a potential bridge. As a result they did not undertake a public consultation in September as we had previously expected. We remain in close contact with TfL and will engage with any future proposals. We are developing detailed design work for a new South Dock bridge and will consult on our proposals in late 2019 before we submit a planning application in 2020. In September we started consultation on how we should allocated Local Infrastructure
<i>Directorate</i>	<i>Lead Officer</i>	
Place Directorate	David Williams	
<i>Portfolio Owners</i>	Deputy Mayor for Planning, Air Quality and Tackling Poverty; Executive Mayor	

	Funds received in 2019/20.
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<i>Strategic Plan activity</i>		<i>Note</i>
Action 6.7 	Continue to drive improvements to the planning process	<p>As part of our drive to improve our online services, we have developed a Planning Weekly News List. Residents can register and receive a weekly list of planning applications determined, submitted and recent planning appeals by ward or for the whole borough. We are now developing the news update section. We are also working on a project which will enable residents to undertake the full planning application process online. The project which will streamline our processes will be launched in the next few months.</p> <p>We have adopted a new Planning and Building Control Scheme of Delegation aimed at supporting appropriate decision making. We are also developing a new fee for planning performance agreement management and monitoring. This is a fee for developers and it will go towards the cost of the planning service.</p> <p>In September we launched the 2019 Local Infrastructure Fund (LIF) consultation for residents and local businesses. LIF consists of developer contributions to fund projects in the communities where developments are taking place. The consultation, available online and by paper at our Idea Stores will run through quarter 3.</p>
<i>Directorate</i>	<i>Lead Officer</i>	
Place Directorate	David Williams	
<i>Portfolio Owners</i>	Deputy Mayor for Planning, Air Quality and Tackling Poverty	

<i>Strategic Plan activity</i>		<i>Note</i>
Action 6.8 	Deliver the programme of Liveable Streets	<p>The Liveable Streets programme aims to improve the look and feel of public spaces in neighbourhoods across the borough and make it easier, safer, and more convenient to get around by foot, bike and public transport. We also to encourage more sustainable journeys and to improve air quality and road safety.</p> <p>We are actively engaging with residents, businesses and other stakeholders via workshops and consultation events around our Liveable Streets Programme. In quarter 2 we held workshops, drop in sessions, and walkabouts in Bethnal Green, Wapping, Barkantine and Brick Lane, and these schemes are now active. We met with several residents and tenants associations and the Tower Hamlets Accessibility Forum and the Housing Forum.</p>
<i>Directorate</i>	<i>Lead Officer</i>	
Place Directorate	Dan Jones	
<i>Portfolio Owners</i>	Executive Mayor	

We will be consulting on detailed proposals for Bethnal Green from 28th October.

Outcome 7 People feel safer in their neighbourhoods and anti-social behaviour is tackled

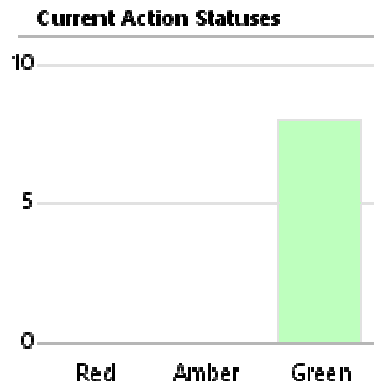
Tower Hamlets is a vibrant, diverse and exciting place to live, work and visit and we want everyone to feel safe and enjoy all that it has to offer, however residents report that crime was their top concern in 2018. Tackling the interlinked issues of violence, anti-social behaviour (ASB), drugs and alcohol is a significant challenge for the borough, but the council is working closely with a range of partners to deliver a holistic response that addresses the causes and consequences of crime, abuse and exploitation.

The council will make use of all the tools and powers available to it to prevent issues occurring and to focus on robust enforcement against the drugs market and its associated violent crime and ASB. We will continue to fund additional police officers and support Operation Continuum activity. The council will also seek to reduce the harm caused to communities by offering improved support to victims, safeguarding people at risk of abuse or neglect, and effective treatment services for those with addictions.

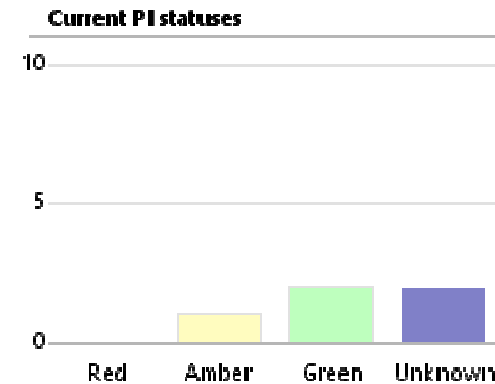
In addition the council will be reviewing its approach to CCTV and evaluating its Neighbourhood Management Pilot to assess what more can be done to enhance feelings of safety by ensuring that its response is evidence led and co-produced with residents.

Status summary for this strategic outcome

Strategic action status chart




Strategic measure status chart



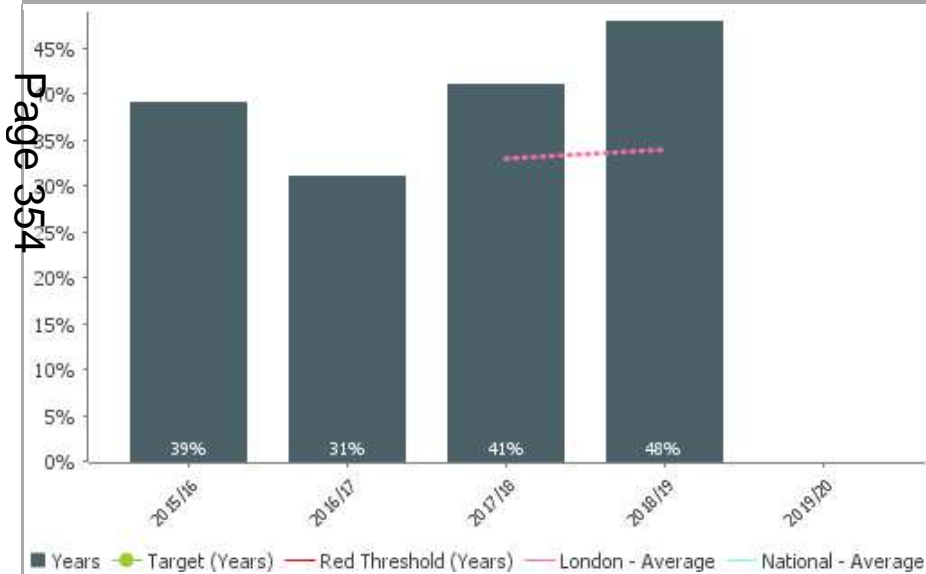
Residents' concern about crime and anti-social behaviour

This measure is taken from the council's residents' survey and is expressed as the percentage of respondents who felt that crime and Anti-Social Behaviour was ranked in the top three concerns for them.

Lead member	Last update		Short term trend arrow	Long term trend (DOT)
Deputy Mayor and Cabinet Member for Community Safety and Equalities	2018/19		↓	↓
Lead officer	Type	Target	Actual	RAG rating
Divisional Director, Community Safety	Strategic		48%	 Data Only

Performance data trend chart

Latest note



Latest outturn relates to the Annual Resident Survey published in Summer 2019. The next survey is due to take place in early 2020 with results expected to be included in the end of year report for 2019/20.



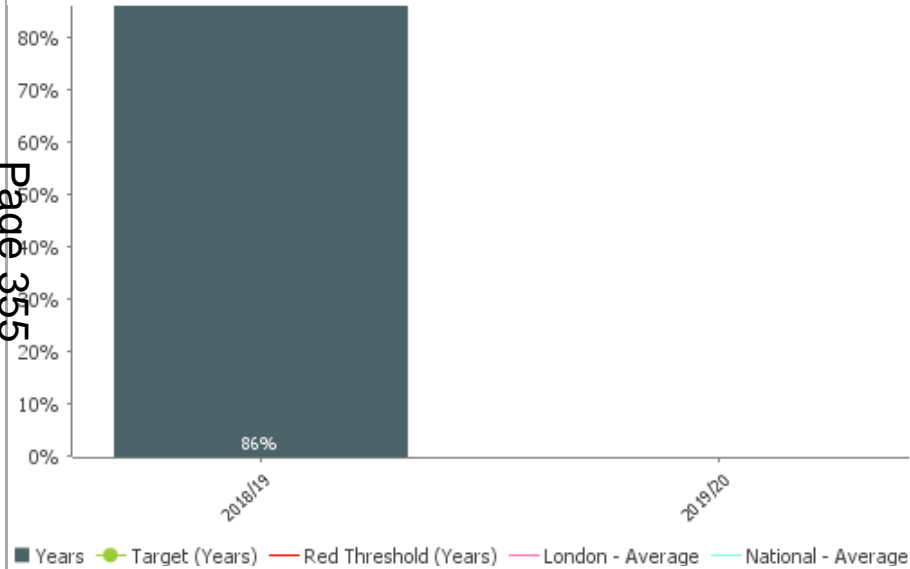
Residents' feeling of safety in their local area

This measure is taken from the council's residents' survey and is expressed as a percentage of respondents who feel safe in their local area during the daytime.

Lead member	Last update		Short term trend arrow	Long term trend (DOT)
Deputy Mayor and Cabinet Member for Community Safety and Equalities	2018/19			
Lead officer	Type	Target	Actual	RAG rating
Divisional Director, Community Safety	Strategic		86%	Data Only

Performance data trend chart

Latest note



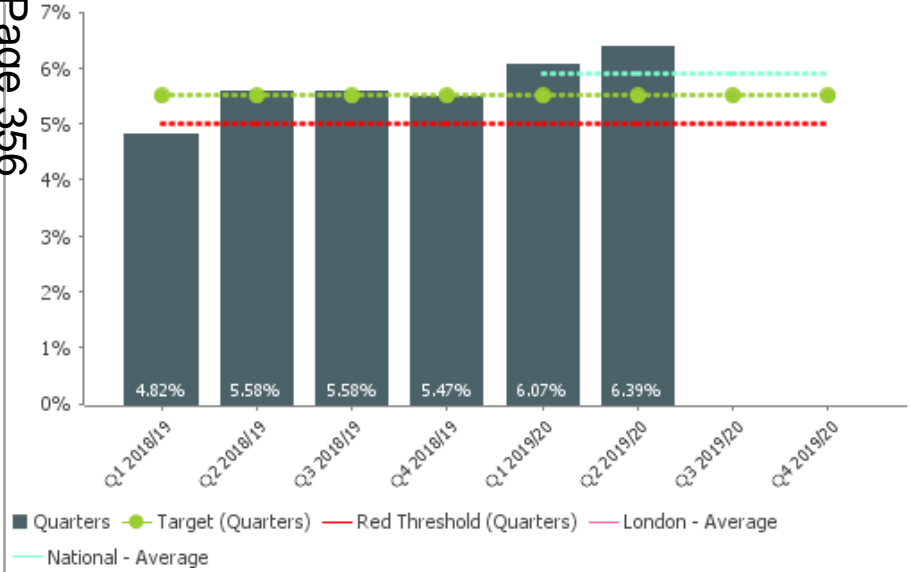
This question was introduced in the 2018/19 residents' survey. Latest outturn relates to the Annual Resident Survey published in Summer 2019. The next survey is due to take place in early 2020 with results expected to be included in the end of year report for 2019/20.

✔ Drug users (opiate users) successfully completing treatment

This indicator looks at successful addiction recovery. It shows the proportion of opiate users that left drug treatment successfully (free of drug(s) dependence) who do not return to treatment again within 6 months expressed as a proportion of the total number of opiate users in treatment. It is well evidenced that cessation of drug use reduces re-offending significantly, reduces infection transmission and improves health and well-being.

<i>Lead member</i>	<i>Last update</i>		<i>Short term trend arrow</i>	<i>Long term trend (DOT)</i>
Deputy Mayor and Cabinet Member for Community Safety and Equalities	Q2 2019/20		↑	↑
<i>Lead officer</i>	<i>Type</i>	<i>Target</i>	<i>Actual</i>	<i>RAG rating</i>
Divisional Director, Community Safety	Strategic	5.5%	6.39%	✔ Green

Performance data trend chart



Latest note

The current data (6.07% in Q1, and 6.39% in Q2) shows we are exceeding the target of 5.5%. This indicator looks at successful addiction recovery.

Example of resident impact: A, a 35 year old South Asian male with a long history of Drug and Alcohol use, was referred to Reset treatment by Probation in November 2018 following a conviction for assault. A had a history of ADHD since childhood for which he was on medication. A reported issues related to anger particularly following use of alcohol. A was in a relationship, and had a one year old child who had some Children and Families services involvement as a 'child in need'. At assessment A reported that he was unemployed. Following assessment A was referred for anger management by the Probation Service and engaged in treatment for his alcohol dependency by Reset. A completed both the Anger Management course and his engagement with Reset successfully in August 2019. Though there are recommendation by Children and Families services to attend parenting course for both parents, the Child in Need Case has been closed. A is now drug and alcohol free, and currently in employment. Supervision with probation ongoing

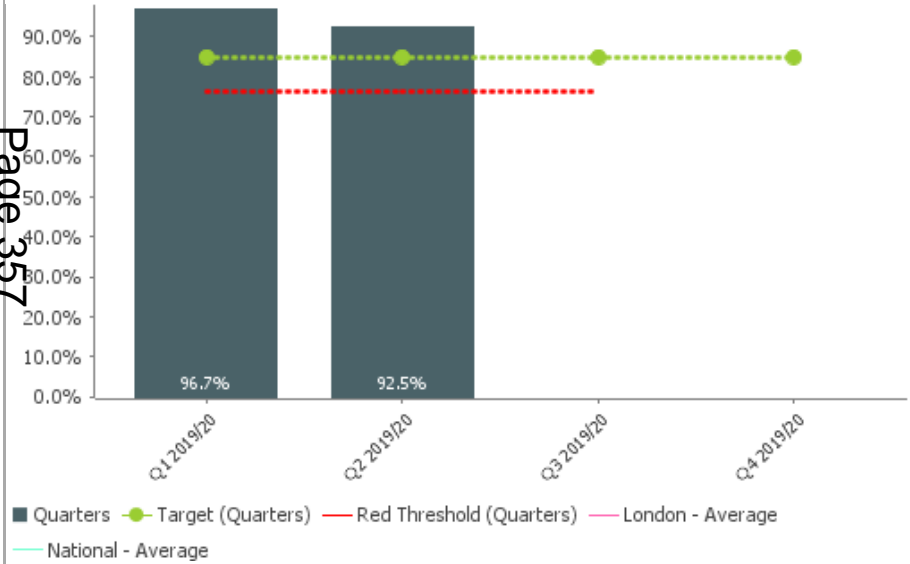
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✔ Victims of violence against women and girls or hate crime who feel safer after engaging with victim support

This indicator measures the effectiveness of the council's commissioned services from Victim Support. The council commissions two services; one to support victims of serious hate crime and one to support those who have experienced domestic abuse. The measure is derived from the results of a self-completion satisfaction survey that all those who have used the service are invited to complete and forms part of the contract monitoring of the commissioned service.

<i>Lead member</i>	<i>Last update</i>		<i>Short term trend arrow</i>	<i>Long term trend (DOT)</i>
Deputy Mayor and Cabinet Member for Community Safety and Equalities	Q2 2019/20		↓	↓
<i>Lead officer</i>	<i>Type</i>	<i>Target</i>	<i>Actual</i>	<i>RAG rating</i>
Divisional Director, Community Safety	Strategic	85.0%	92.5%	✔ Green

Performance data trend chart



Latest note

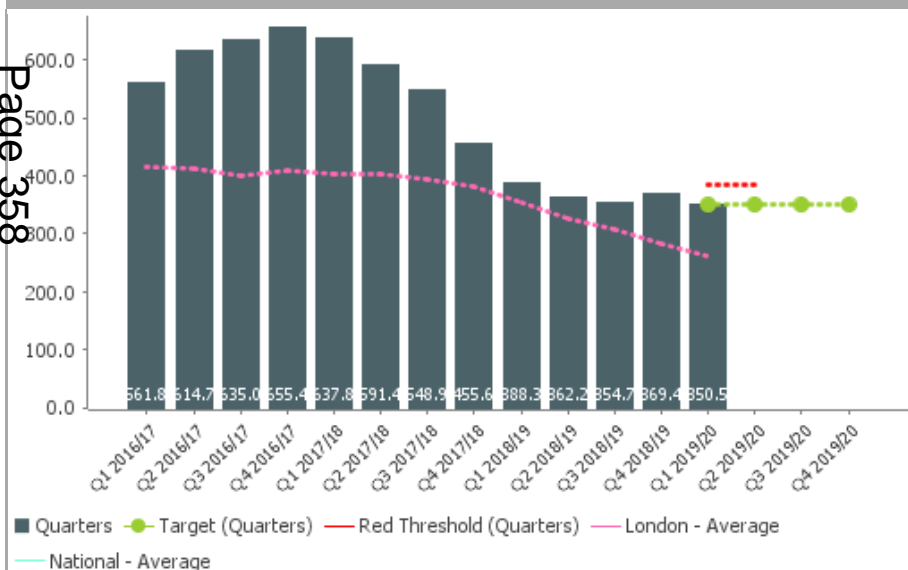
The current data (96.7 % in Q1, and 92.5% in Q2) shows we are exceeding the target of 85.0%. This indicator reflects the effectiveness of the council's commissioned services in supporting victims of domestic abuse and serious hate crime in terms of making them feel safer after support.

⚠ Young people entering the youth justice system for the first time

This measure looks at the number of young people who enter the youth justice system for the first time in their lives. The measure is calculated quarterly for a rolling 12 month period and is expressed as a rate per 100,000 people in the relevant age group. This standardisation enables comparison to other areas.

<i>Lead member</i>	<i>Last update</i>		<i>Short term trend arrow</i>	<i>Long term trend (DOT)</i>
Cabinet Member for Children, Schools and Young People	Q1 2019/20		↑	↑
<i>Lead officer</i>	<i>Type</i>	<i>Target</i>	<i>Actual</i>	<i>RAG rating</i>
Divisional Director, Youth and Commissioning	Strategic	350.0	350.5	⚠ Amber

Performance data trend chart



Latest note

Why is performance off target?

We are very close to the target, only exceeding the target by 0.5. Target is 350 and the current figure is 350.5. The current figure of 350.5 first time entrants entering the youth justice system for the first time in their lives is the lowest figure to date (99 over 28247).

The average of the last 4 quarters (2018/2019) was 369. The FTE rate has been successfully reduced on a consistent basis since 2016-17 onwards. This shows that the Youth Offending Service continues to make great progress reducing the number of first-time entrants.

The measure is calculated quarterly for a rolling 12 month period and is expressed as a rate per 100,000 local youth population figure for 10-17 year olds. 317 was the figure for the Tower Hamlets YJB YOT family average, based on an average including 10 other Borough's for Q1 2019/20, which means we are 9th out of a total of 11 Youth Offending Services.

PLEASE NOTE the data is taken from the latest available YJB YDS national report for Apr-Jun 2019. The data itself covers the period of Apr 18 - Mar 19.

What actions will be taken?

A fully staffed YOT prevention team will continue to offer a consistent Triage service to

divert low risk young people from entering the justice system for the first time.


When will performance be on track?


The current direction of travel indicates that the YOT is working towards meeting the current target of 350.

Note


Please note that the data for this indicator is drawn from national policing data to ensure it is in line with national reporting. National policing data is available six months in arrears. Please note that the data covers a rolling 12 month period; the figure reported for Q1 2019/20 covers the period April 2018 - March 2019. The next quarterly release will cover July 2018 - June 2019 and will be available in November 2019.


Strategic plan delivery


Strategic Plan activity		Note
Action 7.1 	Provide education and awareness-raising to prevent and tackle issues including violence against women and girls, safeguarding and exploitation	Our Community Safety Teams for Prevent & Hate Crime continue to deliver targeted educational and awareness training to prevent and tackle violence, and safeguard vulnerable people from exploitation. During quarter 2 we ran:
Directorate	Lead Officer	
Children and Culture Directorate; Health, Adults and Communities Directorate	Richard Baldwin; Claudia Brown; Ann Corbett	<ul style="list-style-type: none"> • 35 workshops reaching 715 individuals to raise awareness of Prevent; • 22 outreach & briefing sessions reaching 1,277 individuals within community organisations, the council and our partner organisations; • 14 training sessions delivered to 212 professionals to raise awareness of hate crime, domestic violence and violence against women and girls (VAWG); • 4 councillors and 31 professionals are now VAWG Champions.
Portfolio Owners	Cabinet Member for Adults, Health and Wellbeing; Cabinet Member for Children, Schools and Young People; Deputy Mayor and Cabinet Member for Community Safety and Equalities	Work is underway for our ambitious 16 Days of Activism against Gender Based Violence and the White Ribbon Campaign Day which takes place on 25th November 2019.


Strategic Plan activity		Note
Action 7.2 	Run a new specialist substance misuse project and get more people into treatment programmes, so that more people get the help they need	Our new specialist substance misuse service is now up and running. The new treatment provider - Change, Grow, Live (CGL) - is set to provide a persons' centred recovery support service by the end of October to adults misusing drugs and alcohol.
Directorate	Lead Officer	Alongside this, a new substance misuse investigation team set up in August and funded by the Mayor's Office for Policing and Crime (MOPAC), has:
Health, Adults and Communities Directorate	Ann Corbett	<ul style="list-style-type: none"> • supported 30 civil/criminal orders, • made 128 voluntary referrals for ASB related to substance misuse incidents.
Portfolio Owners	Deputy Mayor and Cabinet Member for	

	Community Safety and Equalities	The aim of the Team is to use a support and compliance model, utilising powers provided by the Anti-Social Behaviour Crime and Policing Act 2014 to direct complex drug and alcohol users into treatment.
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<i>Strategic Plan activity</i>		<i>Note</i>
Action 7.3 	Make it easier for residents to report ASB to the council	We have completed our review of the customer journey process experienced by victims of ASB by co-producing recommendations with residents and partners. We are now working to implement those recommendations by further improving information on our webpages, simplifying reporting of ASB and improving the overall customer journey. We are improving awareness of how to report ASB via the Safer Together Gold Campaign. Our ASB Investigators now work on a geographical basis, and are aligned to the relevant police Safer Neighbourhood Teams. This means they can work much more closely with the police and residents to achieve resolutions to complex ASB issues
<i>Directorate</i>	<i>Lead Officer</i>	
Health, Adults and Communities Directorate	Ann Corbett	
<i>Portfolio Owners</i>	Deputy Mayor and Cabinet Member for Community Safety and Equalities	


<i>Strategic Plan activity</i>		<i>Note</i>
Action 7.4 	Continue partnership working with the Police to carry out geographic drugs operations ('Operation Continuum') so that drugs markets are continually disrupted	We work in partnership with the police to carry out targeted drugs operations in locations in the borough as part of Operation Continuum. We continue to enforce our powers under the Anti-Social Behaviour Act legislation to tackle on-street drug dealers and their vehicles by issuing Community Protection Warnings, and Community Protection Notices. In Q2, this has resulted in: <ul style="list-style-type: none"> • 104 CPWs issued • 12 CPNs issued for breaching a CPW • 6 prosecutions for breaching a CPN This work is supported by information of serious and organised crime group mapping insights for improved intelligence-led operations. 88% of people issued a CPW have not come to notice of police again for drugs matters. This is a new initiative working with Tower Hamlets police team and is generating interest in London.
<i>Directorate</i>	<i>Lead Officer</i>	
Health, Adults and Communities Directorate	Ann Corbett	
<i>Portfolio Owners</i>	Deputy Mayor and Cabinet Member for Community Safety and Equalities	

<i>Strategic Plan activity</i>		<i>Note</i>
Action 7.5 	Invest in CCTV, Police personnel and other resources to proactively tackle crime and ASB, enabling us to identify hotspots and take swift action	We continue to invest in CCTV, police personnel and other resources to tackle crime and ASB. Our council funded partnership taskforce of police officers has: <ul style="list-style-type: none"> • made a total of 113 arrests; • issued 152 ASB warnings; • issued 16 Penalty Notices for Disorder • seized 13 vehicles.
<i>Directorate</i>	<i>Lead Officer</i>	
Health, Adults and Communities Directorate	Ann Corbett	
<i>Portfolio Owners</i>	Deputy Mayor and Cabinet Member for Community Safety and Equalities	We have developed our business case for investment to upgrade the CCTV system and this is now going through its approval process. Our CCTV room helped the police make a total of 243 arrests between April and September 2019. We have started our recruitment drive for Tower Hamlets Enforcement Officers (THEO) to attract new staff to the THEO service. We are also looking at the systems, processes and structures of the service to make sure it can deliver the best possible outcomes for residents.

<i>Strategic Plan activity</i>		<i>Note</i>
Action 7.6 	Hold perpetrators of crime and abuse to account, using the full spectrum of our enforcement powers when needed	Under the enforcement powers of the ASB Crime & Policing Act 2014, we are using our powers to hold perpetrators of crime and abuse to account. During quarter 2, we issued: <ul style="list-style-type: none"> • 1 Premises Closure notice to close a drugs address; • 3 Partial Premises Closure Orders; • 1 Community Behaviour Order; • 5 injunctions; and • 1 Community Protection Warning.
<i>Directorate</i>	<i>Lead Officer</i>	
Health, Adults and Communities Directorate	Ann Corbett	
<i>Portfolio Owners</i>	Deputy Mayor and Cabinet Member for Community Safety and Equalities	Our Community Multi Agency Risk Assessment Conference (CMARAC) is using its full

		range of powers to safeguard ASB vulnerable victims in their own home which resulted in 2 housing evictions of ASB perpetrators during quarter 2.
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<i>Strategic Plan activity</i>		<i>Note</i>
Action 7.7 	Work closely with the community to prevent, identify and tackle crime, ASB, abuse and community tensions	<p>Our ambitious work programme to tackle ASB, community tensions and prevent crime continues in quarter 2. Working with residents we:</p> <ul style="list-style-type: none"> • facilitated a Community Action Day in Rectory Gardens in Limehouse with the ward councillor and local residents to clear-up and rejuvenate the park and stop it becoming a magnet for ASB; • developed "Action Taken" leaflet to help residents understand what we are doing to reduce crime and ASB and to highlight the successes we have had; • we have another Community Action Day in the near future on the Hereford Estate working in partnership with local ward councillors, local residents and in partnership with Tower Hamlets Homes. <p>An evaluation of the effectiveness and impact of the Community Action Days held to date will be presented at the next Mayor's Crime & ASB Board for a decision about extending the programme to cover the rest of the wards in the borough.</p> <p>Our Independent Prevent Advisory Group continues to help us co-produce our work to prevent extremism. In September two guest speakers from the Home Office and the Counter Terrorism Command Unit helped the group build up knowledge for effective scrutiny, and set funding priorities based on evidence.</p>
<i>Directorate</i>	<i>Lead Officer</i>	
Health, Adults and Communities Directorate	Ann Corbett	
<i>Portfolio Owners</i>	Deputy Mayor and Cabinet Member for Community Safety and Equalities	

<i>Strategic Plan activity</i>		<i>Note</i>
Action 7.8 	Provide personalised support for victims, including new specialist support to victims of knife crime at the Royal London Hospital	<p>We have an extensive Knife Crime Action Plan and a number of innovative projects. In quarter 2, our hospital based Community Safety Violent Crime Reduction Project offered support to 69 victims of violence - 13 of these young adults live in Tower Hamlets. Out of these thirteen, five young people agreed to accept additional support and continue to engage with the project. The Project aims to reduce repeat victimisation, reduce knife</p>
<i>Directorate</i>	<i>Lead Officer</i>	

Health, Adults and Communities Directorate	Ann Corbett	crime, safeguard and support those who wish to exit a criminal lifestyle.
<i>Portfolio Owners</i>	Deputy Mayor and Cabinet Member for Community Safety and Equalities	<p>We have an extensive range of interventions in place for safeguarding victims of domestic abuse. In quarter 2, three referrals were made to our new sanctuary service. The Scheme may be described as a multi-agency victim support scheme designed to help families at risk of abuse to stay in their own homes. Our Independent Domestic Violence Advocates (IDVA) provided specialist support to 140 victims of domestic abuse.</p> <p>We are working with the Police, Beyond the Streets and Streetlights UK, and Safeguarding Teams to support women working in the sex trade with information and refer them to support services.</p>

Outcome 8 People feel they are part of a cohesive and vibrant community

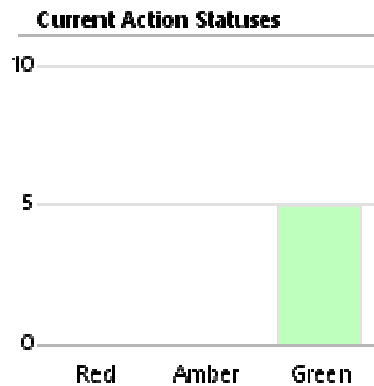
Tower Hamlets is a place with a rich history- from its beginnings as an historic docks and manufacturing area it has grown and developed at a faster rate than anywhere else in the UK. This culturally rich and diverse area faces unique challenges as it moves from a place of deprivation to become an extension of the Central London economic powerhouse and a vibrant borough in its own right.

We are also one of the most vibrant and diverse communities in the UK. Local people are proud of the high levels of community cohesion, and value the rich cultural offer that comes with this mix.

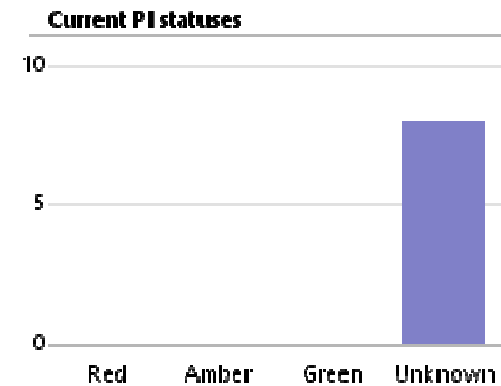
In February 2019, the government published its Integrated Communities Action Plan which we will use to develop Council's Cohesion Plan to help embed cohesion in all our business. This will have a focus on building positive relationships valuing diversity, supporting equality of opportunity and enhancing a sense of belonging.

Status summary for this strategic outcome

Strategic action status chart



Strategic measure status chart

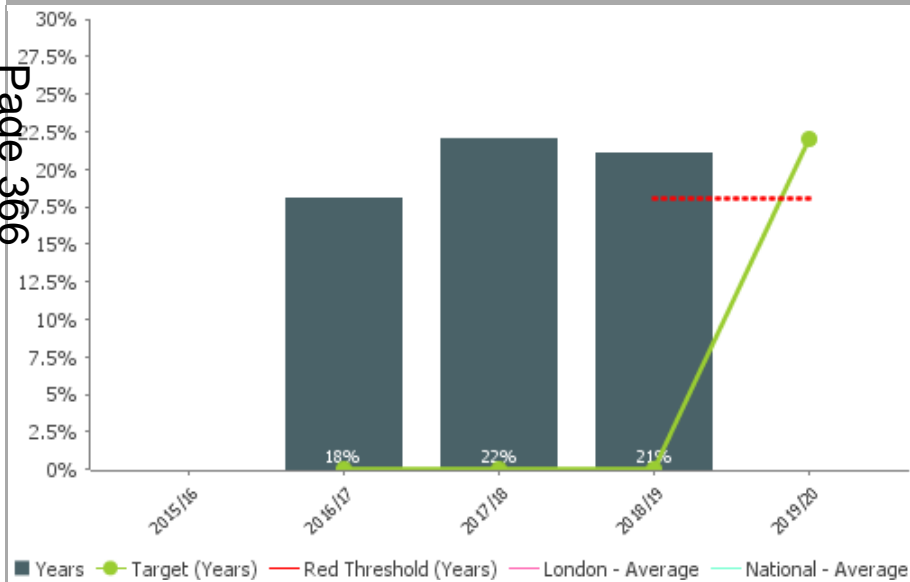


? Residents' level of volunteering

This measure is taken from the council's residents survey and is expressed as a percentage of respondents who answered yes to the statement 'over the last 12 months, how often, if at all, have you taken part in any volunteering activities? By volunteering, we mean giving unpaid help through groups, clubs, schools or organisations for the benefit of others'.

Lead member	Last update	Short term trend arrow	Long term trend (DOT)	
Cabinet Member for Work and Economic Growth	2019/20	?	?	
Lead officer	Type	Target	Actual	RAG rating
Divisional Director Strategy, Policy and Partnership	Strategic	22%		? Unknown

Performance data trend chart



Latest note

Latest outturn relates to the Annual Resident Survey published in Summer 2019. The next survey is due to take place in early 2020 with results expected to be included in the end of year report for 2019/20. The London comparator is taken from the Survey of Londoners (June 2019).

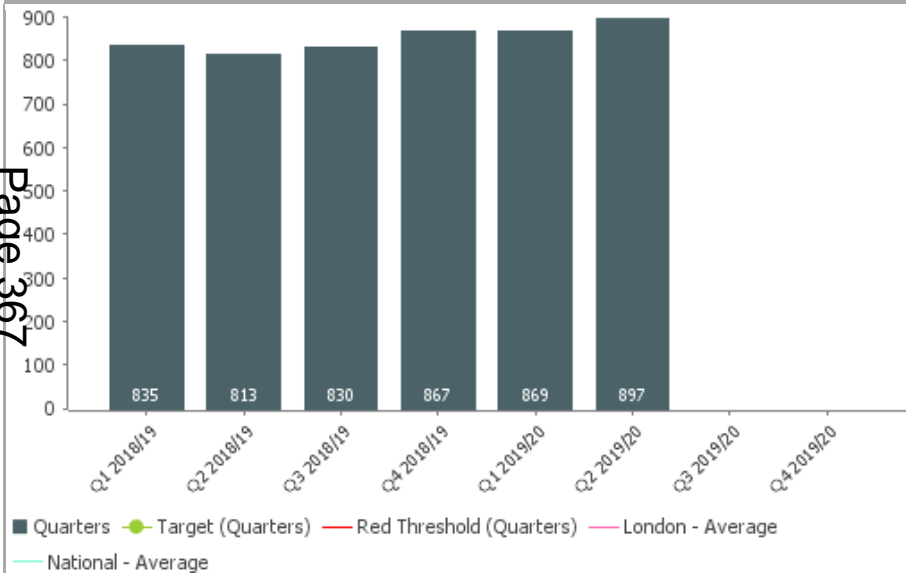
Level of Hate Crime

MOPAC Local Borough Police Priority - Number of offences of hate reported to the Police including Disability, Faith, Homophobic, Racist and Transgender. This is a 12 months rolling measure.

<i>Lead member</i>	<i>Last update</i>		<i>Short term trend arrow</i>	<i>Long term trend (DOT)</i>
Deputy Mayor and Cabinet Member for Community Safety and Equalities Executive Mayor	Q2 2019/20		?	?
<i>Lead officer</i>	<i>Type</i>	<i>Target</i>	<i>Actual</i>	<i>RAG rating</i>
Divisional Director, Community Safety	Strategic		897	Data Only

Performance data trend chart

Latest note



The rolling 12 months figures show that Tower Hamlets has the 4th highest level of recorded hate crime in London by volume. The numbers are up 10% (84 offences) on the previous year made up by comparative increases in faith, homophobic and race hate offences. Despite the increase Tower Hamlets improved from having the 3rd highest level to 4th highest level by volume.

In Q2 (as opposed to in the rolling 12 months), Tower Hamlets had the 6th highest volume of recorded hate crime in London. Westminster, Lambeth, Hackney, Camden and Southwark all had higher volumes. There have been no 'hate' critical incidents reported, and there has been no reason to convene the Tension Monitoring Group during the past quarter.

We are undertaking a range of activities to improve community cohesion, reduce tension, but also to encourage and improve reporting (which may lead to higher levels of recorded crime of previously unreported incidents). Examples include:

- National Hate Crime Awareness Week – a series of activities including a Peace Walk
- No Place for Hate Forum and annual action plan
- No Place for Hate Campaign, Pledge Competition, and Champions
- Disability Hate Crime Project to tackle under reporting
- London Muslim Centre Hate Crime Ambassadors Project to encourage

reporting of Islamophobia

- Hate Incidents Panel which ensures a coordinated response to hate crime cases
- Challenging prejudice amongst young people through Youth Council and Youth Champions

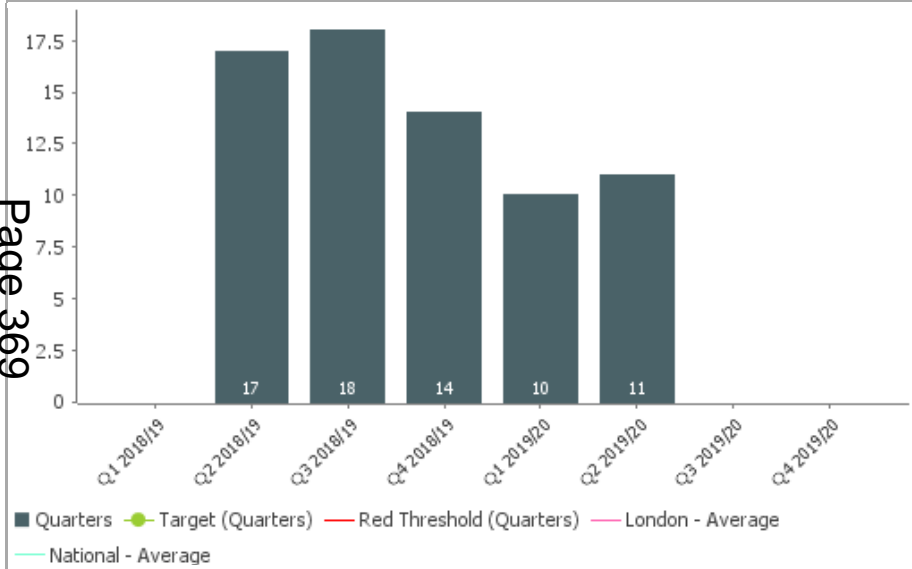


Level of hate crime (Disability)

MOPAC Local Borough Police Priority - Number of offences of hate reported to the Police relating to disability

Lead member	Last update		Short term trend arrow	Long term trend (DOT)
Deputy Mayor and Cabinet Member for Community Safety and Equalities Executive Mayor	Q2 2019/20			
Lead officer	Type	Target	Actual	RAG rating
Divisional Director, Community Safety	Strategic		11	Data Only

Performance data trend chart	Latest note
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See commentary under overall hate crime measure.

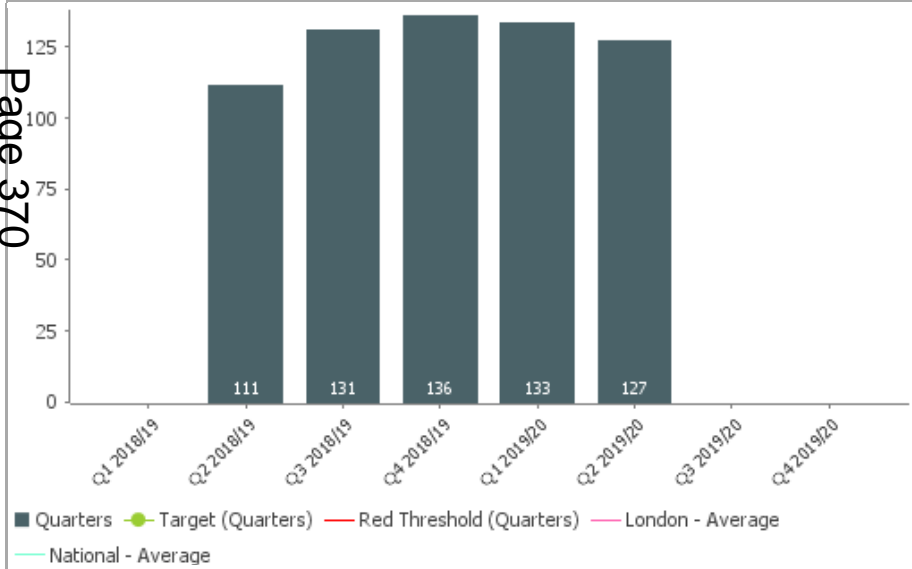


Level of hate crime (Faith)

MOPAC Local Borough Police Priority - Number of offences of hate reported to the Police relating to faith

Lead member	Last update		Short term trend arrow	Long term trend (DOT)
Deputy Mayor and Cabinet Member for Community Safety and Equalities Executive Mayor	Q2 2019/20		↑	↑
Lead officer	Type	Target	Actual	RAG rating
Divisional Director, Community Safety	Strategic		127	Data Only




Performance data trend chart	Latest note
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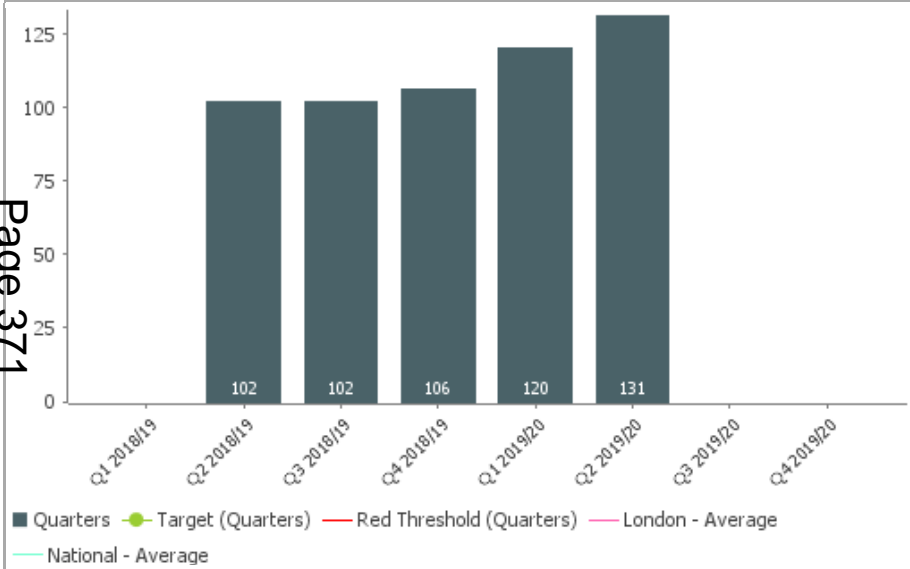
See commentary under overall hate crime measure.

 **Level of hate crime (Homophobic)**

MOPAC Local Borough Police Priority - Number of offences of hate reported to the Police relating to homophobia

Lead member	Last update		Short term trend arrow	Long term trend (DOT)
Deputy Mayor and Cabinet Member for Community Safety and Equalities Executive Mayor	Q2 2019/20			
Lead officer	Type	Target	Actual	RAG rating
Divisional Director, Community Safety	Strategic		131	 Data Only

Performance data trend chart *Latest note*



See commentary under overall hate crime measure.

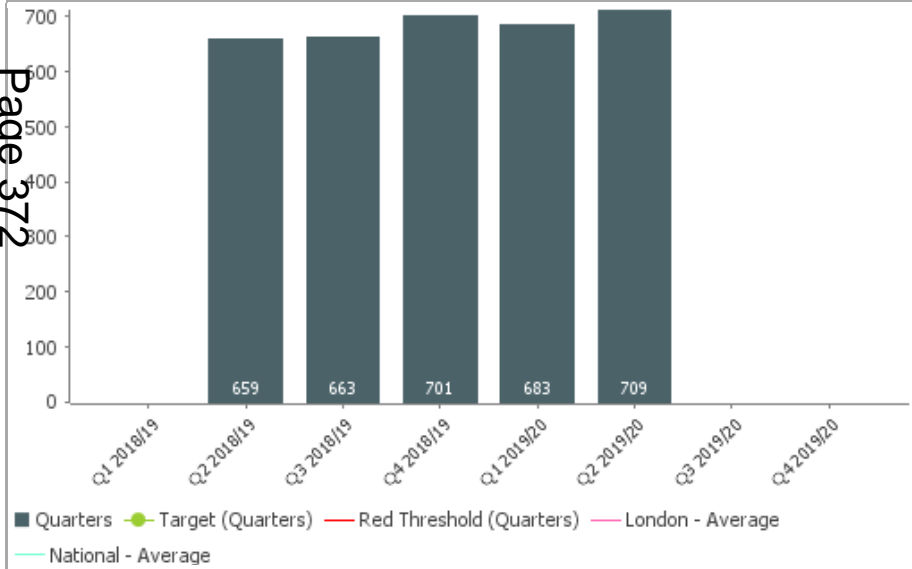


Level of hate crime (Racist)

MOPAC Local Borough Police Priority - Number of offences of hate reported to the Police relating to racism

Lead member	Last update		Short term trend arrow	Long term trend (DOT)
Deputy Mayor and Cabinet Member for Community Safety and Equalities Executive Mayor	Q2 2019/20			
Lead officer	Type	Target	Actual	RAG rating
Divisional Director, Community Safety	Strategic		709	Data Only




Performance data trend chart	Latest note
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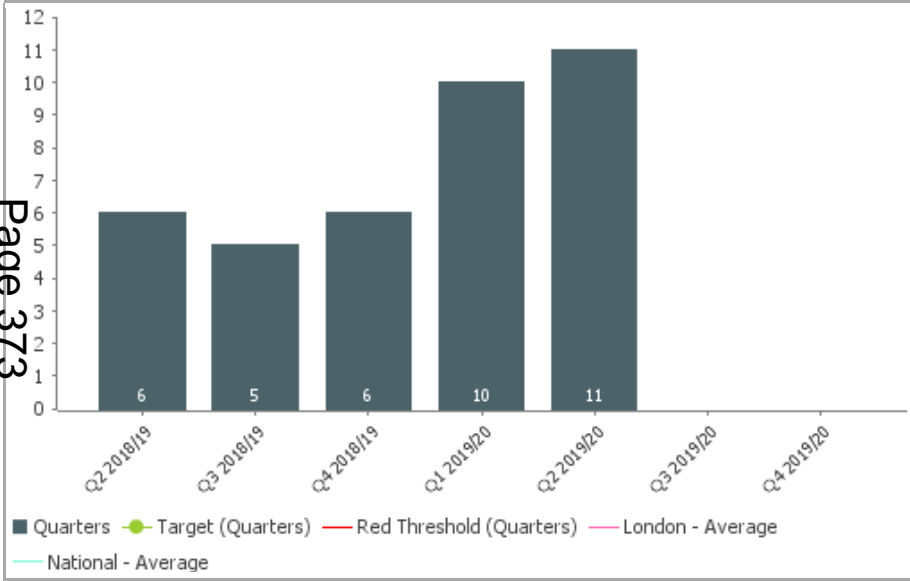
See commentary under overall hate crime measure.

 **Level of hate crime (Transgender)**

MOPAC Local Borough Police Priority - Number of offences of hate reported to the Police relating to transphobia

Lead member	Last update		Short term trend arrow	Long term trend (DOT)
Deputy Mayor and Cabinet Member for Community Safety and Equalities Executive Mayor	Q2 2019/20			
Lead officer	Type	Target	Actual	RAG rating
Divisional Director, Community Safety	Strategic		11	 Data Only




Performance data trend chart *Latest note*



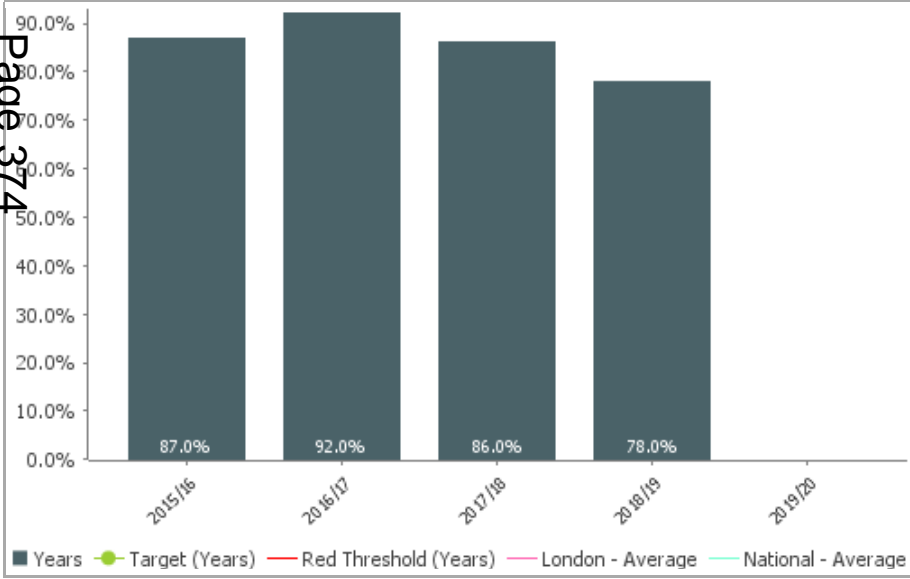
See commentary under overall hate crime measure.

Residents' perception of people from different backgrounds getting on well

This measure is taken from the council's residents survey and is expressed as the percentage of respondents who feel that 'people from different backgrounds who get on well together'

Lead member	Last update	Short term trend arrow	Long term trend (DOT)
Deputy Mayor and Cabinet Member for Community Safety and Equalities Executive Mayor	2018/19		
Lead officer	Type	Target	Actual
Divisional Director Strategy, Policy and Partnership	Strategic		78.0%
			 Data Only


Performance data trend chart	Latest note
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Latest outturn relates to the Annual Resident Survey published in Summer 2019. The next survey is due to take place in early 2020 with results expected to be included in the end of year report for 2019/20.


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Strategic plan delivery

Strategic Plan activity		Note
Action 8.1 	Work with stakeholders and communities to tackle emerging tensions and issues within and between communities including those generated by hate crimes or extremism	Community tension is monitored on a weekly basis, however, no incidents have led to increased tension requiring the Tension Monitoring Group to convene. Levels of hate crime are monitored by the Community Safety Partnership and overseen by the Hate Crime Forum.
<i>Directorate</i>	<i>Lead Officer</i>	
Health, Adults and Communities Directorate	Ann Corbett	
<i>Portfolio Owners</i>	Deputy Mayor and Cabinet Member for Community Safety and Equalities	

Strategic Plan activity		Note
Action 8.2 	Roll out community-led improvement projects & programmes including supporting the voluntary & community sector to deliver services and bring people together	The Local Community Fund, a new programme of funding for voluntary and community sector (VCS) organisations, will replace the existing Mainstream Grants programme in October 2019. Under the new Local Community Fund, Cabinet have approved funding arrangements for 50 projects. In September, our Grants Determination Sub-Committee, who are in charge of making the final decision on funding arrangements, agreed to extend the funding of 17 organisations under the former Mainstream Grants Programme. This helps to protect services for residents that were impacted by the change. Across all of our funding streams, we are assisting organisations relating to the following areas: Inclusion / Health and Wellbeing, Digital Inclusion and Awareness, Advice and Information, Employment and Skills, and Community Safety.
<i>Directorate</i>	<i>Lead Officer</i>	
Governance Directorate	Sharon Godman	
<i>Portfolio Owners</i>	Cabinet Member for Resources and the Voluntary Sector; Deputy Mayor and Cabinet Member for Community Safety and Equalities; Executive Mayor	We are currently working with key partners to develop our new Voluntary and Community Sector Strategy. We are liaising with community researchers to develop a plan for

		engagement with the wider public. We have also undertaken consultation with Voluntary and Community Sector organisations at the premises forum.
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<i>Strategic Plan activity</i>		<i>Note</i>
Action 8.3 	Improve services for refugees and people fleeing harm	We have undertaken engagement with council services to understand access to services for refugees and those fleeing harm to map out and develop our current understanding. The next phase of this will be to work with external organisations to understand the experience of these groups and things we can learn from best practice in other areas.
<i>Directorate</i>	<i>Lead Officer</i>	
Governance Directorate	Sharon Godman	
<i>Portfolio Owners</i>	Deputy Mayor and Cabinet Member for Community Safety and Equalities; Executive Mayor	

<i>Strategic Plan activity</i>		<i>Note</i>
Action 8.4	Deliver projects to support integration of new communities	We have an additional 23 Controlling Migration Fund (CMF) participants enrolled on our English for Speakers of Other Languages (ESOL) programme, Conversation Club courses and volunteering programmes through local providers. Our new Welcome to Tower Hamlets guide was printed and evaluated by CMF learners, CMF volunteers, ESOL learners and volunteers in the borough, staff and external stakeholders. A total of 170 participants took part in the evaluation of the guide. Feedback from the evaluation of the welcome guide will be used to produce a final digital version, which will be available in November 2019. We have continued to run our Cohesion Programme. The programme is designed to increase engagement and interaction between people from different backgrounds in Mile End and Aldgate East. Through local volunteers, we released a film called 'The Aldgate East Stories' which was screened in different venues in Aldgate East including at the Genesis Cinema. We ran our end of event project event for Aldgate East on 28th September 2019.
<i>Directorate</i>	<i>Lead Officer</i>	
Governance Directorate	Sharon Godman	
<i>Portfolio Owners</i>	Deputy Mayor and Cabinet Member for Community Safety and Equalities; Executive Mayor	

<i>Strategic Plan activity</i>		<i>Note</i>
Action 8.5	Deliver initiatives to celebrate	Over the summer we ran our maior events programme in parks and open spaces to bring

	diverse cultures of our borough	residents together. In total we ran 20 events and 63 activities across 14 parks. We are on track to surpass our target for the year to support over 100 events in parks, with 154 processed to date and approximately 143,000 attendees.
<i>Directorate</i>	<i>Lead Officer</i>	
Children and Culture Directorate; Governance Directorate	Sharon Godman; Judith St John	At the beginning of August we held our 'A Great Day Out' event in Victoria Park. This is a free yearly event with a great offering of live music, fairground rides, educational activities and culturally inclusive activities. The event was attended by over 5,000 participants. As part of the event we worked in partnership with a local Bengali artist and a Somalian art organisation (Numbi Arts). Guests took part in workshops to learn traditional Somali finger weaving using willow and recycled newspapers.
<i>Portfolio Owners</i>	Cabinet Member for Culture, Arts and Brexit; Deputy Mayor and Cabinet Member for Community Safety and Equalities; Executive Mayor	<p>We have launched a series of three Bowls taster sessions (one in August and two in September) held at Victoria Park Bowls Club. These have combined music, entertainment, food and drink with bowls try outs. The events were designed to encourage more membership at the club with an emphasis on attracting a new and diverse audience.</p> <p>We launched our Oval night market in mid-May and there have been a total of three events, the most recent of which was in July. The markets combine live music, workshops, urban street food and craft stalls by small enterprises from Tower Hamlets. They promote creative and cultural activity in the borough.</p> <p>We have been planning our programme for Black History Month in October and our hugely popular fireworks event in November.</p>

Outcome 9 People say we are open and transparent putting residents at the heart of everything we do

Our customers are varied and have a range of needs. Everyone who lives, works, studies, visits or does business in Tower Hamlets will use a council service in some form, whether they are visiting one of the council's parks, applying for a parking permit or simply walking down one of our streets.

We want to make it easier for people to contact us online. Helping our residents to become confident dealing with us online helps them to become more independent financially, socially and practically. This will help them in other areas of their lives, such as getting information about jobs, or getting a better deal from their energy provider.

We will be 'digital by default' (which means that this will generally be the main way that people contact or do business with us for straightforward matters).

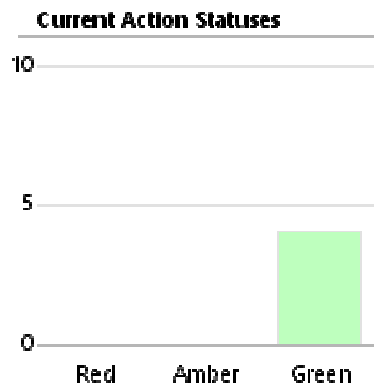
Every customer should feel that they have received excellent customer service when dealing with us. Customers should be able to easily connect with us whenever they want. In most cases we should be able to meet their needs first time around. To do this we will need to work with our customers to get feedback, as well as analysing the information provided by people using our services.

We need to transform our approach to business intelligence and insight. The Council and its partners collect and store vast amounts of data on our citizens, businesses and communities that we use as part of our everyday service delivery and transform into intelligence to inform service planning. However much of this data is fragmented and underused – we need to unlock the potential of our data giving staff the power to make better informed decisions to deliver better outcomes for our citizens and communities.

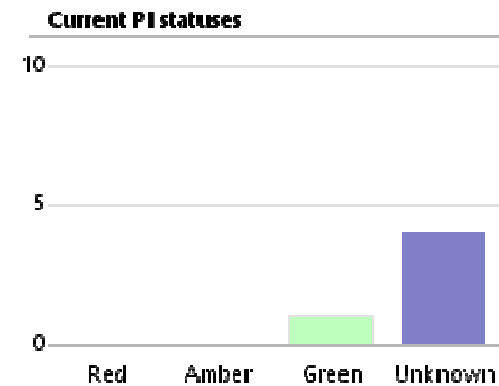
Through positive delivery of our Community Engagement Strategy, we want to strengthen our relationship with local people by enabling them to be actively involved in the design and delivery of services.

Status summary for this strategic outcome

Strategic action status chart



Strategic measure status chart





Residents' perception of being kept informed by the Council

This measure is taken from the council's residents survey and is expressed as the percentage of respondents who agree a great deal or to some extent with the statement 'the council keeps residents informed about what it is doing'.

Lead member	Last update	Short term trend arrow	Long term trend (DOT)	
Executive Mayor	2018/19	↓	↑	
Lead officer	Type	Target	Actual	RAG rating
Divisional Director, Communications and Marketing	Strategic		72%	Data Only

Performance data trend chart	Latest note
<p>70% 65% 60% 55% 50% 45% 40% 35% 30% 25% 20% 15% 10% 5% 0%</p> <p>72%</p> <p>2018/19 2019/20</p> <p>■ Years ● Target (Years) — Red Threshold (Years) — London - Average — National - Average</p>	<p>Latest outturn relates to the Annual Resident Survey published in Summer 2019. The next survey is due to take place in early 2020 with results expected to be included in the end of year report for 2019/20.</p>

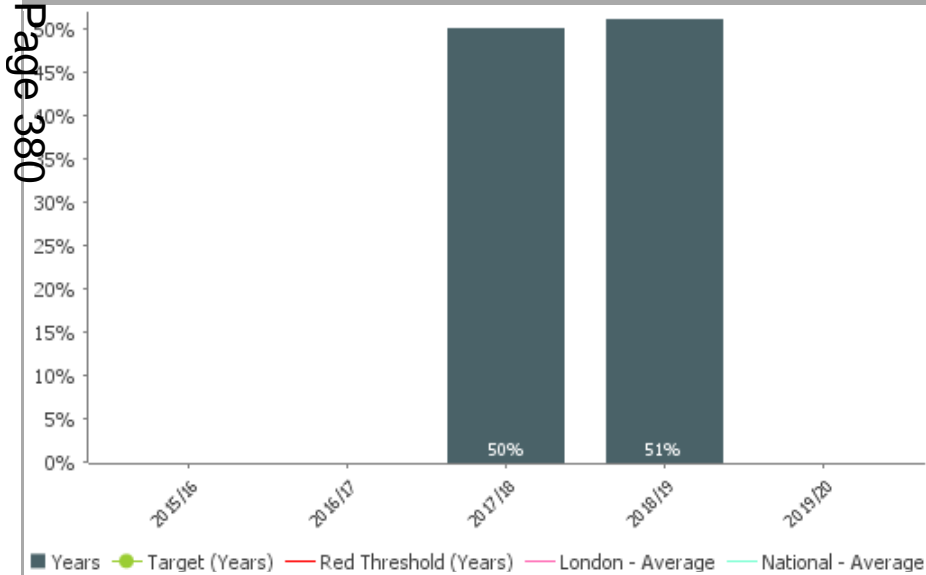


Residents' perception of Council transparency

This measure is taken from the council's residents survey and is expressed as the percentage of respondents who agree a great deal or to some extent with the statement 'the council is open and transparent about its activities'.

Lead member	Last update		Short term trend arrow	Long term trend (DOT)
Executive Mayor	2018/19		↑	↑
Lead officer	Type	Target	Actual	RAG rating
Divisional Director, Communications and Marketing Head of Information Governance Divisional Director Strategy, Policy and Partnership	Strategic		51%	Data Only

Performance data trend chart



Latest note

Latest outturn relates to the Annual Resident Survey published in Summer 2019. The next survey is due to take place in early 2020 with results expected to be included in the end of year report for 2019/20.

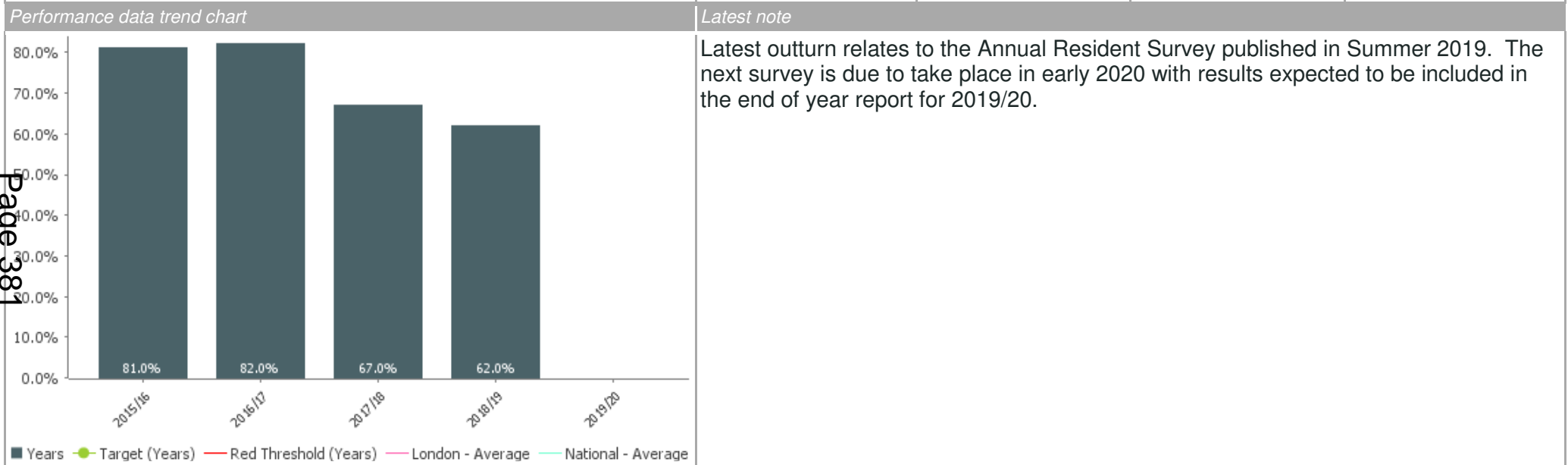
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User satisfaction with libraries and Idea Stores

This measure is taken from the council's residents survey and is expressed as the percentage of respondents who use Idea Stores and libraries and rate them as good, very good or excellent.

Lead member	Last update		Short term trend arrow	Long term trend (DOT)
Cabinet Member for Culture, Arts and Brexit	2018/19			
Lead officer	Type	Target	Actual	RAG rating
Divisional Director, Customer Services	Strategic		62.0%	Data Only





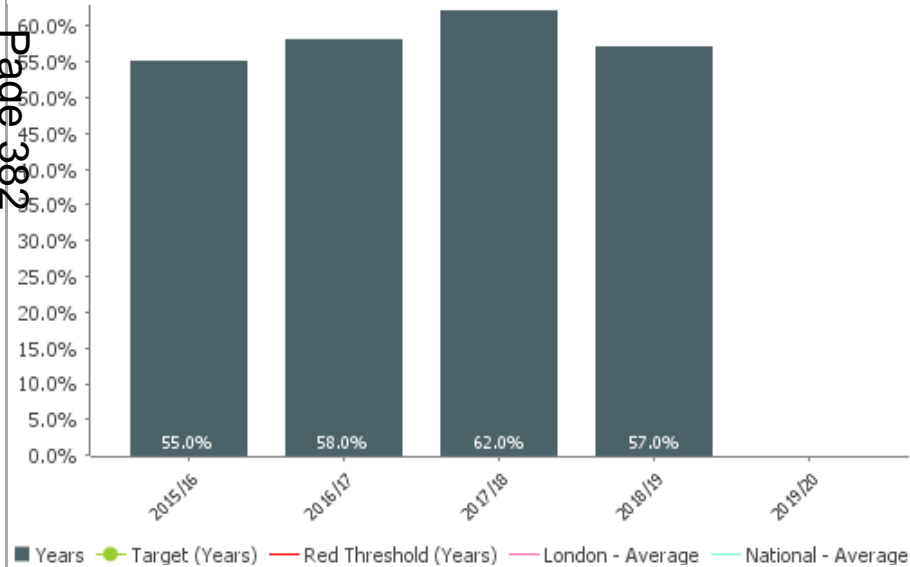
Residents' perception of being involved in decision-making

This measure is taken from the council's residents survey and is expressed as the percentage of respondents who agree a great deal or to some extent with the statement 'the council involves residents when making decisions'.

Lead member	Last update	Short term trend arrow	Long term trend (DOT)
Executive Mayor	2018/19		
Lead officer	Type	Target	Actual
Divisional Director, Communications and Marketing Divisional Director Strategy, Policy and Partnership	Strategic		57.0%
			Data Only

Performance data trend chart

Latest note






Latest outturn relates to the Annual Resident Survey published in Summer 2019. The next survey is due to take place in early 2020 with results expected to be included in the end of year report for 2019/20.

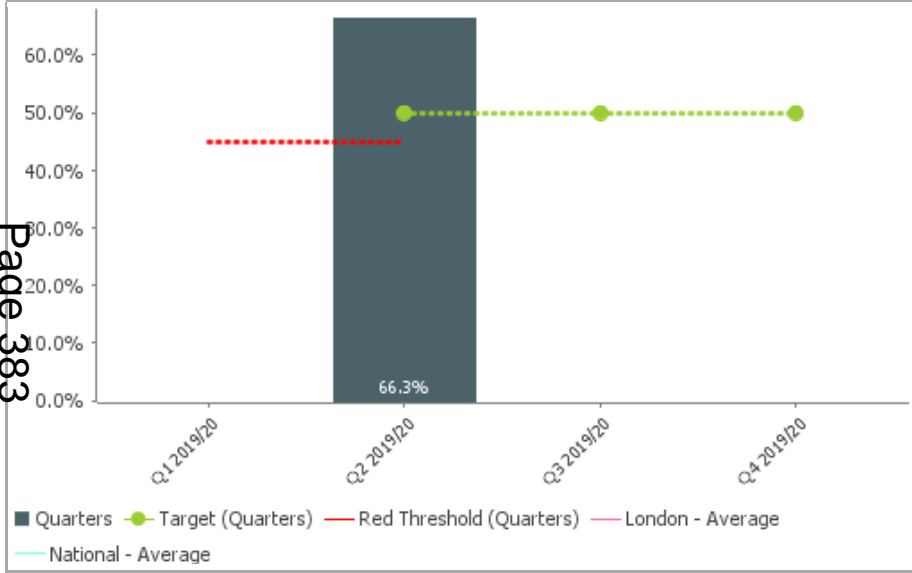
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 **Service user satisfaction with the Council's online service offer**

This indicator measures the % of customers who are satisfied with the online customer experience.

<i>Lead member</i>	<i>Last update</i>	<i>Short term trend arrow</i>	<i>Long term trend (DOT)</i>	
Cabinet Member for Culture, Arts and Brexit	Q2 2019/20			
<i>Lead officer</i>	<i>Type</i>	<i>Target</i>	<i>Actual</i>	<i>RAG rating</i>
Divisional Director, Customer Services	Strategic	50.0%	66.3%	 Green

Performance data trend chart *Latest note*



Latest note

Strategic plan delivery

<i>Strategic Plan activity</i>		<i>Note</i>
Action 9.1	Work with internal and external stakeholders to deliver improvements in the Council's consultation and engagement approach	We are improving how we consult and engage our internal and external stakeholders. We have commissioned a new consultation hub, which will ensure there is a consistent standard of consultation and will offer new opportunities to engage digitally with residents. The site is currently under development. We are currently training our communications team to use the site and consultations will start to be added once the site is up and running and our staff are fully trained. Our communications team and strategy teams worked in partnership to produce a consultation and engagement handbook. The handbook advises staff on how to build effective and best practice consultation and engagement activities and will be shared with staff in due course.
<i>Directorate</i>	<i>Lead Officer</i>	
Governance Directorate	Andreas Christophorou; Sharon Godman	
<i>Portfolio Owners</i>	Executive Mayor	
<i>Strategic Plan activity</i>		<i>Note</i>
Action 9.2	Develop a digital strategy which supports our work to improve customer services through digital platforms	We have continued to migrate more of our services to self-service platforms. You can now book, re-schedule and cancel bulky waste collections online. Since this went live in mid-July we have had over 3,000 bulky waste submissions. This has the benefit of saving both time and money compared with making the requests via telephone or face-to-face. We have also created an online application form to join the housing register. This also went live in mid-July. To date there have been over 400 applications.
<i>Directorate</i>	<i>Lead Officer</i>	
Resources Directorate	Shazia Hussain	
<i>Portfolio Owners</i>	Cabinet Member for Culture, Arts and Brexit	
<i>Strategic Plan activity</i>		<i>Note</i>
Action 9.3	Develop initiatives to increase democratic participation by local communities	In August we began a review of our polling districts. The review is designed to see if the polling districts in Tower Hamlets are arranged to suit the needs of our voters. Our review is expected to be concluded at the end of January 2020.

<i>Directorate</i>		<i>Lead Officer</i>
Governance Directorate	Robert Curtis; Sharon Godman; Matthew Mannion	
<i>Portfolio Owners</i>	Executive Mayor	

The results of our Strengthening Local Democracy Review were released at the end of June. Throughout this quarter, we have been sharing these results with relevant internal stakeholders to strengthen and improve local democracy in Tower Hamlets. One of the recommendations was to engage more with new borough residents. We are currently developing a 'how to get involved' video and supporting the Council's 'Welcome to Tower Hamlets' booklet to increase democratic engagement with new residents. These are both expected to be completed next quarter.

<i>Strategic Plan activity</i>		<i>Note</i>
Action 9.4	Deliver a Communications Strategy to tell the story about the Council	
<i>Directorate</i>	<i>Lead Officer</i>	
Governance Directorate	Andreas Christophorou	
<i>Portfolio Owners</i>	Executive Mayor	

Our communications team continues to work with internal and external partners to implement the 2019-20 Communications Strategy that was agreed in quarter one. This work contributes to the delivery of the council's key corporate campaigns and helps to promote the borough by empowering our staff and stakeholders to tell our story. We provided a council stall at Queen Mary University's Freshers' Fair and generated over 75 sign-ups to the council's e-newsletter, introduced hundreds of new students to the council and welcomed them to the borough. Our reach on LinkedIn continued to increase, aided by staff sharing and posting good news about the council. This has helped us welcome more than 400 additional followers. We are now running 'Place' features in Our East End publication. Place features tell the story of an interesting place within Tower Hamlets. In Septembers' addition we ran a feature on the Truman Brewery and included a community feature on an internationally renowned choreographer and dancer who produced an autobiographical documentary entitled 'The Curry House Kid' that was filmed around Brick Lane.

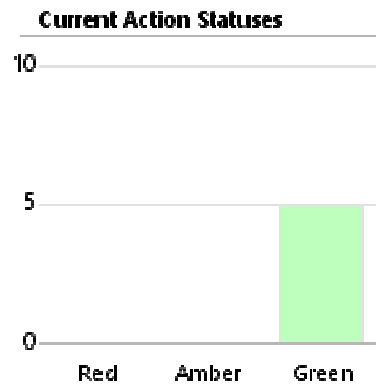
Outcome 10 People say we work together across boundaries in a strong and effective partnership to achieve the best outcomes for our residents

We will work in partnership with stakeholders to share resources and become more than the sum of our parts. The Tower Hamlets Strategic Partnership is the borough's Local Strategic Partnership bringing together key stakeholders to provide and improve services and outcomes for local residents. In particular it gives residents more powerful input in the way services are provided and ensures that all aspects of the community work together to achieve the objectives of a borough plan. As partners have reflected on the key opportunities and challenges facing the borough, we have also thought hard about how we are going to achieve our objectives. In a time of austerity and uncertainty, 'less of the same' will not be enough. Public sector organisations in the borough are already making big changes to the ways that they work, and this will need to continue. And as the richness of our conversations about the role of organisations and people beyond the public sector have shown, we really do all need to play our part. Responsible local businesses, a thriving voluntary sector and residents themselves are critical to achieving this Plan.

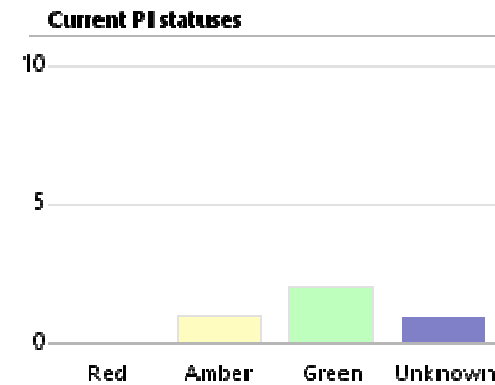
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Status summary for this strategic outcome

Strategic action status chart




Strategic measure status chart

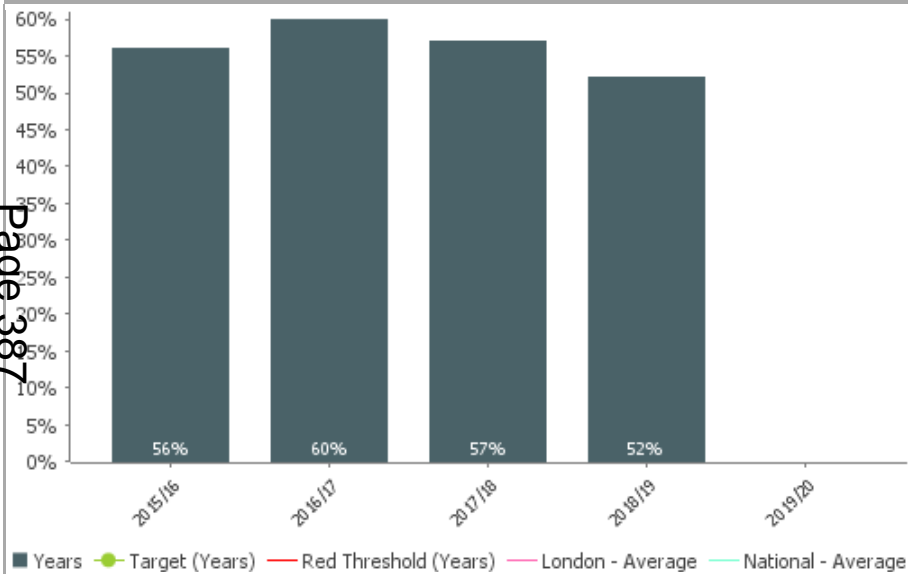


Resident satisfaction with Council and partner response to anti-social behaviour (ASB)

This measure is taken from the council's residents' survey and is expressed as the percentage of respondents who agree that the Police / public services deal with issues in the community

Lead member	Last update		Short term trend arrow	Long term trend (DOT)
Deputy Mayor and Cabinet Member for Community Safety and Equalities	2018/19		↓	↓
Lead officer	Type	Target	Actual	RAG rating
Divisional Director, Community Safety	Strategic		52%	 Data Only

Performance data trend chart



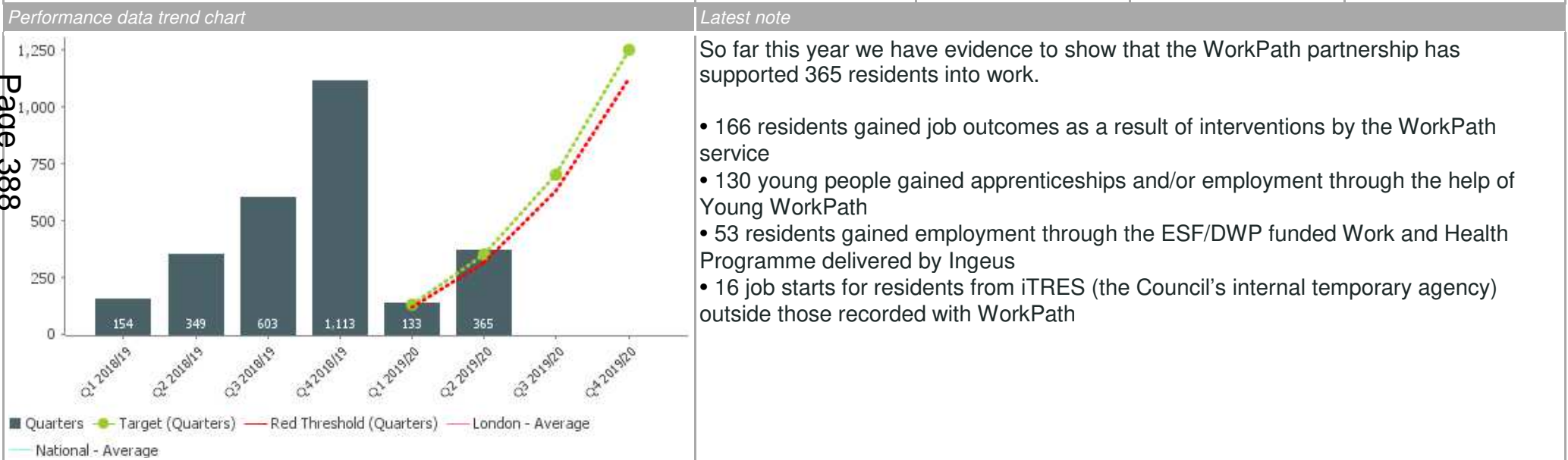
Latest note

The latest outturn relates to the Annual Resident Survey published in Summer 2019. The next survey is due to take place in early 2020.

✔ Residents supported into employment by the WorkPath partnership

This measure is a count of the number of residents supported into work through support from the WorkPath partnership, consisting of the council's WorkPath service and a range of internal and external partners. Cumulative measure.

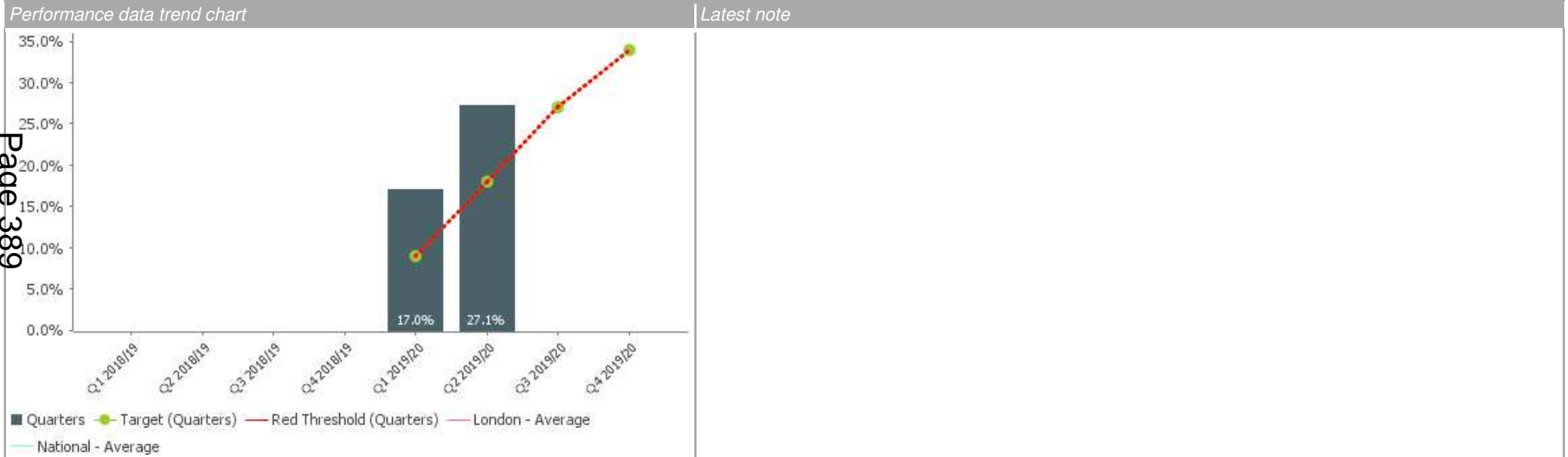
<i>Lead member</i>	<i>Last update</i>		<i>Short term trend arrow</i>	<i>Long term trend (DOT)</i>
Cabinet Member for Work and Economic Growth	Q2 2019/20		↑	↑
<i>Lead officer</i>	<i>Type</i>	<i>Target</i>	<i>Actual</i>	<i>RAG rating</i>
Divisional Director, Growth and Economic Development	Strategic	350	365	✔ Green



✔ Children & Young People accessing Mental Health Services

This measure gives the percentage of children and young people aged 5 - 17 who have a diagnosable mental health condition and are receiving treatment to support their mental wellbeing..

<i>Lead member</i>	<i>Last update</i>		<i>Short term trend arrow</i>	<i>Long term trend (DOT)</i>
Cabinet Member for Adults, Health and Wellbeing Cabinet Member for Children, Schools and Young People	Q2 2019/20		?	?
<i>Lead officer</i>	<i>Type</i>	<i>Target</i>	<i>Actual</i>	<i>RAG rating</i>
Divisional Director, Youth and Commissioning Divisional Director, Integrated Commissioning	Strategic	18.0%	27.1%	✔ Green



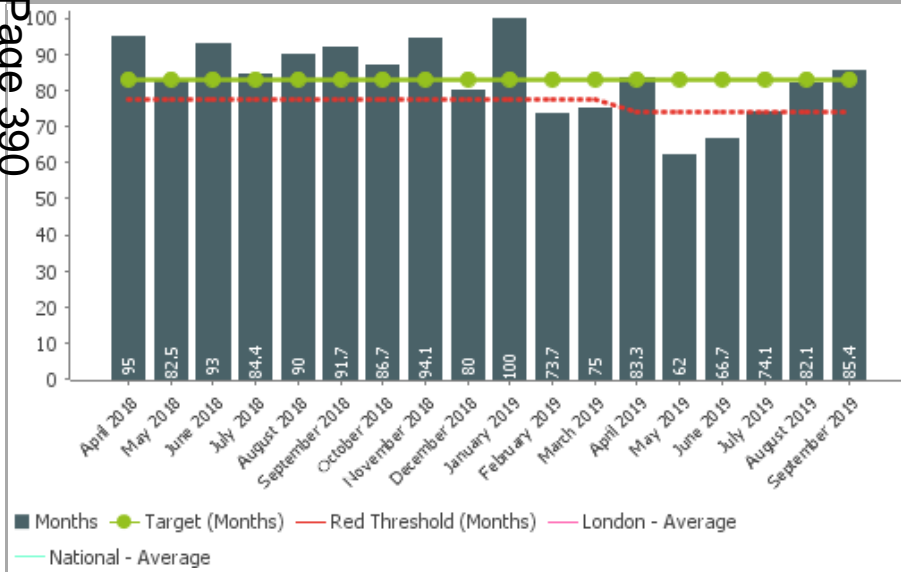


Proportion of older people (65 and over) who were still at home 91 days after discharge from hospital into reablement/rehabilitation services (Effectiveness of Reablement Services)

2B Part 1: The proportion of older people aged 65 and over discharged from hospital to their own home or to a residential or nursing care home or extra care housing for rehabilitation, with a clear intention that they will move on/back to their own home (including a place in extra care housing or an adult placement scheme setting), who are at home or in extra care housing or an adult placement scheme setting 91 days after the date of their discharge from hospital.

<i>Lead member</i>	<i>Last update</i>		<i>Short term trend arrow</i>	<i>Long term trend (DOT)</i>
Cabinet Member for Adults, Health and Wellbeing	Q2 2019/20		↓	↑
<i>Lead officer</i>	<i>Type</i>	<i>Target</i>	<i>Actual</i>	<i>RAG rating</i>
Divisional Director, Adults Social Care	Strategic	83.1	82	Amber

Performance data trend chart



Latest note

Why is Performance off target?

The number of people who are discharged from hospital each month into a reablement service to help them regain their independence is quite small, therefore performance against this indicator tends to fluctuate. In quarter 2, of the 100 people who received a reablement service 82 are known to be living at home 91 days after discharge. This is just below the target of 83.1%. Note that the target has been revised upwards this quarter from 80% to 83% to reflect the confirmed performance level set out in the NHS Better Care Fund (BCF); a national funding programme that seeks to join up local health and social care services. Performance has improved steadily over the quarter. In September, 35 out of 41 people were at home 91 days after discharge (85.4%).

What are we doing?

The multi-disciplinary hospital discharge team is working to maximise the effectiveness of the reablement pathway. Our reablement service was recently re-inspected by the Care Quality Commission (CQC) - the independent regulator for health and social care services in England. It was rated as 'good'. Therefore we are confident that we are running a high quality reablement service and service users report high satisfaction levels.

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(See Outcome 3 '*People who are more independent after being supported through reablement services*' as this section contains a case study highlighting the difference that our reablement service makes to the lives of people with complex needs.)

When will performance be on track?

We expect to fully meet the target during Quarter 3 .

Who is responsible:

Claudia Brown, Divisional Director, Adult Social Care, LBTH and Warwick Tomsett, Joint Integrated Care Director, (LBTH & CCG)

Strategic plan delivery

<i>Strategic Plan activity</i>		<i>Note</i>
Action 10.1	Understand public sector investment, commitments and resourcing across Tower Hamlets	The Partnership Executive Group, comprising of senior officers from the council and other leaders of partner organisations (including the police, NHS, schools and universities, East London Business Alliance and many more), agreed to pilot a public sector spend analysis of English for Speakers of Other Languages (ESOL) provision in the borough so that partners could better understand the spread of provision and identify opportunities to join up budgets.
<i>Directorate</i>	<i>Lead Officer</i>	
Governance Directorate	Sharon Godman	
<i>Portfolio Owners</i>	Executive Mayor	We have now mapped the borough's ESOL provision and made this publicly available on the Council's website, allowing residents to access the relevant information online. We intend to present a summary of this work at a future Partnership Executive Group meeting, in order to identify whether this approach could be applied to other issues in the borough.

<i>Strategic Plan activity</i>		<i>Note</i>
Action 10.2	Deliver a Tower Hamlets place-based campaign	We have completed the research phase of our Tower Hamlet's Place based campaign. In July we presented our findings to the Tower Hamlets Partnership Board, which consists of key stakeholders who improve services and outcomes for local residents. The presentation focussed on our research findings, including modelling our approach on other place campaigns and outlining next steps.
<i>Directorate</i>	<i>Lead Officer</i>	
Governance Directorate	Andreas Christophorou	
<i>Portfolio Owners</i>	Executive Mayor	The Tower Hamlets Partnership Board has given approval to move to the design stage for the campaign which will start in quarter 3.

<i>Strategic Plan activity</i>		<i>Note</i>
Action 10.3	Develop a clear set of priorities for partnership working	We are transforming the Tower Hamlets Partnership so that it is equipped to face the challenges in 2020.

<i>Directorate</i>	<i>Lead Officer</i>	In June the Partnership Board met to take stock of the progress over the last year and identify how it should operate in the future. The council is now building on this information to develop a new programme with refreshed priorities for the partnership, which involves further outreach activity with the community and specific priority projects.
Governance Directorate	Sharon Godman	
<i>Portfolio Owners</i>	Executive Mayor	

<i>Strategic Plan activity</i>		<i>Note</i>
Action 10.4	Work with partners to mitigate impact of Brexit on communities and stakeholders in Tower Hamlets	We are working with partners to prepare for Brexit. We set up a sub-group of the Partnership Executive Group (a group made up of the most strategic partners in the borough) comprising the business, health and education sectors to deliver specific recommendations from the Brexit Commission. This includes a reassurance campaign, borough-wide events and focussed attention on the digital, construction and health and care employment challenges.
<i>Directorate</i>	<i>Lead Officer</i>	
Governance Directorate	Sharon Godman	
<i>Portfolio Owners</i>	Cabinet Member for Culture, Arts and Brexit; Executive Mayor	

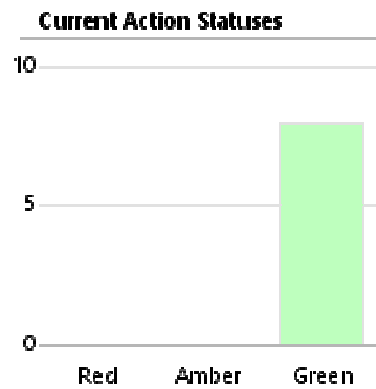
<i>Strategic Plan activity</i>		<i>Note</i>
Action 10.5	Improve collaborative working and integration with partners to drive improvements against the four priority areas of the Tower Hamlets Plan	We are working with partners to monitor the progress against the Tower Hamlets Plan. In September we launched the Tower Hamlets Plan Annual Report, which summarises the activity across the partnership to deliver the plan over the last year. It also agrees outcome measures, which helps us track progress against the outcomes we agreed in July 2018. We are continuing to use Appreciative Inquiries to improve our collaboration on borough-wide issues. In September we held an Appreciative Inquiry on Substance Misuse, involving additional partners from the judiciary, sheltered housing and drug policy forum.
<i>Directorate</i>	<i>Lead Officer</i>	
Governance Directorate	Sharon Godman	
<i>Portfolio Owners</i>	Executive Mayor	

Outcome 11 People say we continuously seek innovation and strive for excellence to embed a culture of sustainable improvement

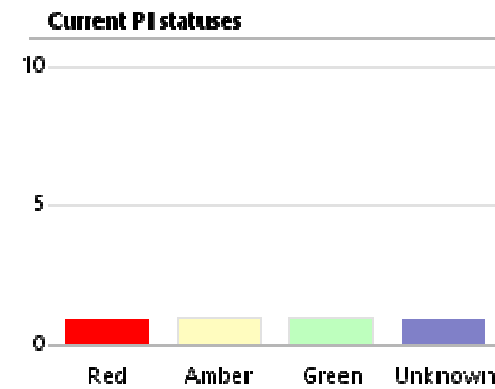
Public services are under huge long-term financial pressures and are also facing rising demand from service users. There are already many initiatives underway to change the way that public services are designed and run in Tower Hamlets, such as the integration of health and social care. We as civic leaders will need to increase our efforts, and ensure a greater coherence of approach across our organisations. We are calling this a ‘whole system’ approach to change in Tower Hamlets, and it will require us to work together in new ways, build better alignment of our respective efforts in service of our shared aims, and put the interests of the borough above those of our individual organisations.

Status summary for this strategic outcome

Strategic action status chart






Strategic measure status chart

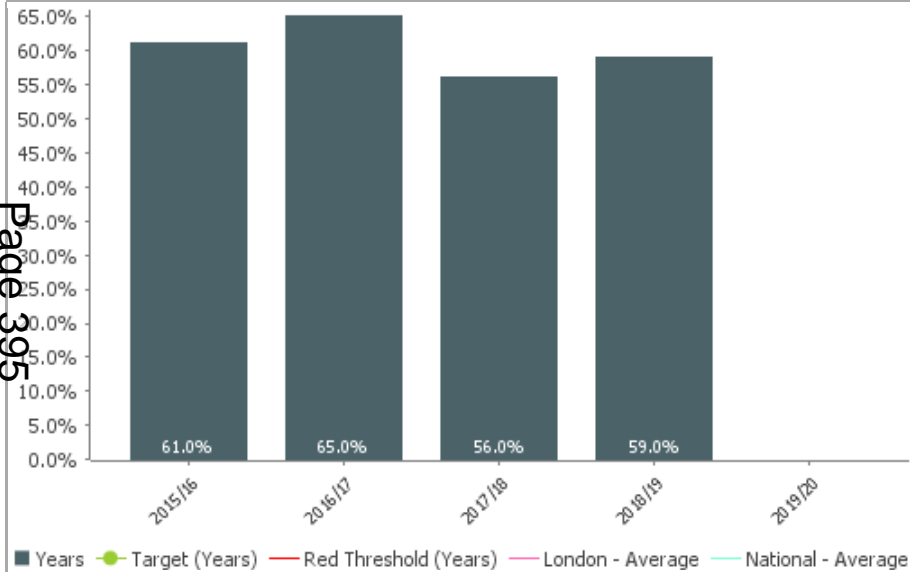


Resident view of the council doing a better job than a year ago

This measure is taken from the council's residents survey and is expressed as the percentage of respondents who agree a great deal or to some extent that the council is doing a better job than a year ago.

Lead member	Last update		Short term trend arrow	Long term trend (DOT)
Executive Mayor	2018/19			
Lead officer	Type	Target	Actual	RAG rating
Divisional Director, Communications and Marketing Divisional Director Strategy, Policy and Partnership	Strategic		59.0%	 Data Only

Performance data trend chart



Latest note

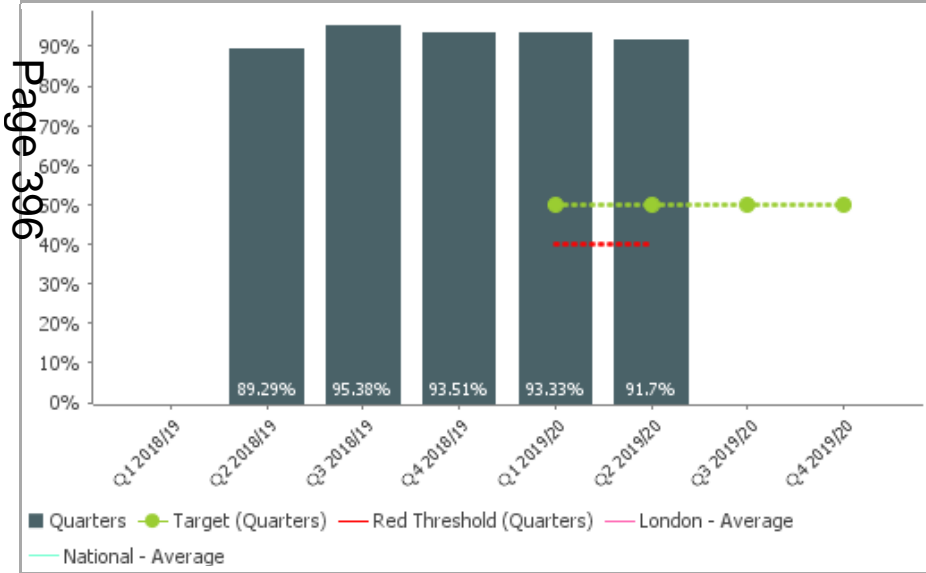
The latest outturn relates to the Annual Resident Survey published in Summer 2019. The next survey is due to take place in early 2020.

Media and press view of the Council

This measure looks at the percentage of positive and neutral media coverage (trade, local, regional, national and BME media) of the Council as an organisation, across a range of media platforms, that is either positive or neutral in tone.

Lead member	Last update		Short term trend arrow	Long term trend (DOT)
Executive Mayor	Q2 2019/20		↓	↓
Lead officer	Type	Target	Actual	RAG rating
Divisional Director, Communications and Marketing	Strategic	50%	91.7%	Green

Performance data trend chart Latest note



Latest note

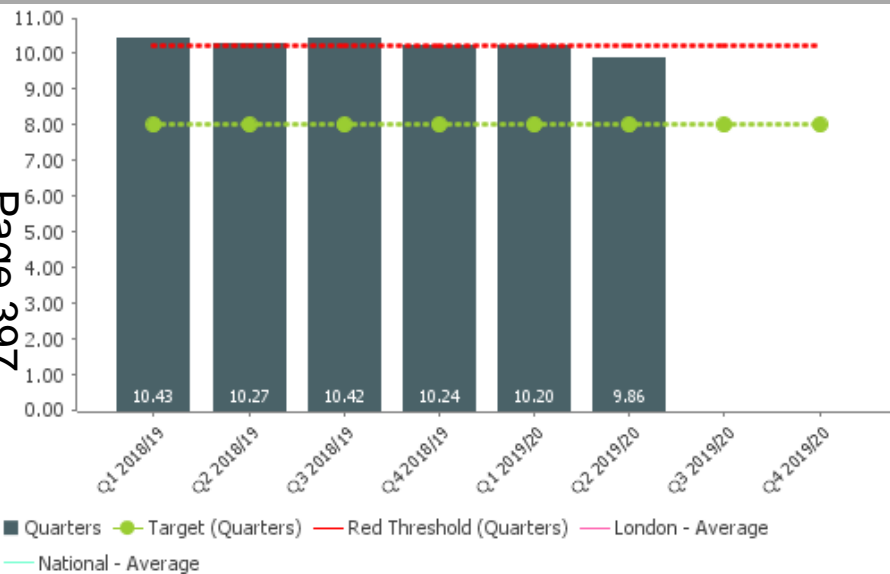
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▲ Council sickness absence

This measure looks at the average number of sickness absence days per full-time equivalent employee over the past 12 months. The measure is reported monthly as a rolling 12 month figure.

<i>Lead member</i>	<i>Last update</i>		<i>Short term trend arrow</i>	<i>Long term trend (DOT)</i>
Cabinet Member for Resources and the Voluntary Sector	Q2 2019/20		▲	▲
<i>Lead officer</i>	<i>Type</i>	<i>Target</i>	<i>Actual</i>	<i>RAG rating</i>
Divisional Director, Human Resources	Strategic	8.00	9.86	▲ Amber

Performance data trend chart



Latest note

Why is performance off target?

Performance is now better than the minimum expectation of 10.24 days but continues to fall short of the target of 8.0 days. Sickness absence levels are calculated on a 12 months rolling basis and the calculation includes those who have left the organisation. Sickness levels are reducing but levels of absence from earlier in the current 12 months period mean that, overall, performance continues to fall short of the target. Performance improvements for this indicator will be gradual as a result. Sickness levels have reduced by 0.4 days when compared to Q2 2017/18.

What actions will be taken and who will be doing this?

Our Human Resources (HR) team are launching a new Sickness Absence Management software system called 'First Care'. We are planning on launching First Care in November and we hope it will improve productivity, streamline administrative processes and enhance the way we support our employees through sickness absence. We are undertaking an Improvement and Efficiency review of sickness absence. A scoping document has been completed and the full review will be taking place in December. This will help us identify where improvements can be made. Our Intelligence & Performance team will continue to monitor sickness absence data using our Organisational Health dashboard. This uses Power BI software to drill down into the data and analyse it intelligently to identify where improvements can be made.

When will it be back on track?

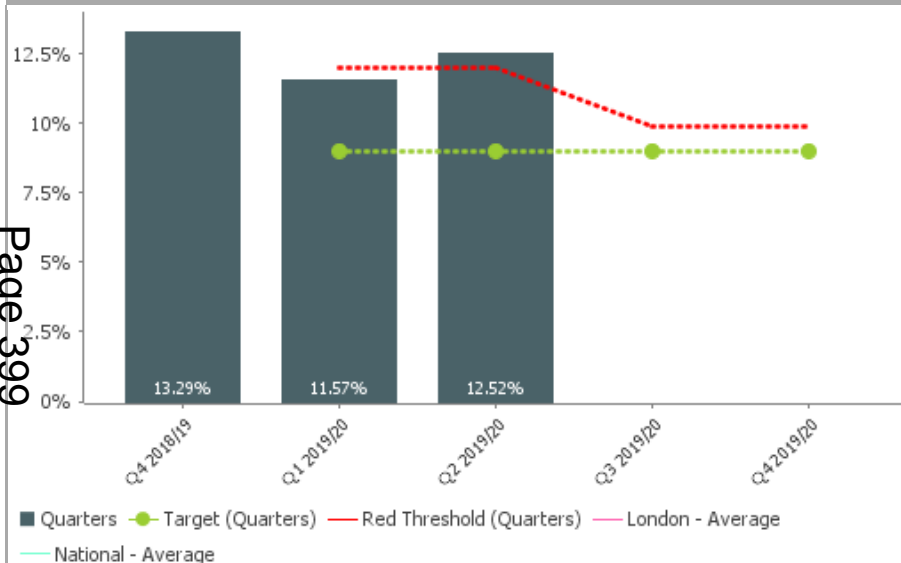
We will continuously monitor whether our actions outlined above have a positive impact on our sickness absence rates. We have already seen improvements and expect this to continue into the future. It is difficult to predict when this measure will be on track, however, in the last six months sickness absence rates have fallen from 10.24 to 9.86 and we will continue to find ways of reducing this further. It is likely to be a gradual change as reporting is calculated on a 12 month rolling basis.

Council staff turnover rate

Measuring the percentage of staff who have left the organisation in the rolling 12 month period. As a proxy of staff retention.

Lead member	Last update	Short term trend arrow	Long term trend (DOT)	
Cabinet Member for Resources and the Voluntary Sector	Q2 2019/20	↓	↓	
Lead officer	Type	Target	Actual	RAG rating
Divisional Director, Human Resources	Strategic	9%	12.52%	Red

Performance data trend chart



Latest note

Why is performance off target?

The 9% target is an aspirational and stretching target given that the average turnover for the last 3 years from 2015-18 has been between 16.05% and 10.82%. A number of things are likely to have had an impact on the staff turnover rate including team restructures and the uncertainty of Brexit.

The current labour market shows that for some of our core roles, staff are able to secure higher salaries in the outer London area. Historically labour competition has been inner London only.

What actions will be taken and who will be doing this?

A number of reviews are in place across the organisation and there is increased management of sickness and staff matters. Work to stabilise the workforce, create baseline establishments for the organisation in all areas and work to improve the recruitment experience are all contributing factors to reducing future turnover rates.

When will it be back on track?


We will continuously monitor whether our actions outlined above have a positive impact on our retention rates.


Strategic plan delivery

Strategic Plan activity		Note
Action 11.1	Deliver the Smarter Together Transformation Programme	<p>The Smarter Together Programme, which encompasses most of the council's transformational change, is proceeding broadly to plan for this year. Whilst we have had some challenges this quarter we continue to see progress. Progress this quarter includes:</p> <ul style="list-style-type: none"> • Re-tendering for the secondary schools catering contract. • Several key customer journeys are now available online • Rolled out replacement multi-functional devices (printer / scanner / copier) across the whole estate.
Directorate	Lead Officer	
Resources Directorate	Teresa Heaney	
Portfolio Owners	Executive Mayor	

Strategic Plan activity		Note
Action 11.2	Deliver improvements to how we use our land and buildings	<p>In September we took a significant in improving how we use our land and buildings. On 20th September we officially broke ground for our new town hall in Whitechapel at the historic Royal London Hospital building. As part of the ground breaking ceremony, the Mayor buried a time capsule for future generations.</p> <p>We have now completed our initial review of the existing property portfolio to understand the property needs of our services in the future. As a result, we have identified around £400k of efficiency opportunities. Further activity will include, a second round of looking at our businesses, and reviewing our advertising spaces.</p> <p>The refurbishment works at our community hub at Granby Hall will be completed by the end of November and will be open in December. The refurbishment works at Raines House community hub are expected to be completed by the end of March and with an opening date scheduled for April.</p>
Directorate	Lead Officer	
Place Directorate	Alan Mccarthy	
Portfolio Owners	Cabinet Member for Resources and the Voluntary Sector	

Strategic Plan activity	Note
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Action 11.3 	Improve the IT infrastructure and modernise applications to enable innovation	We are making a number of IT infrastructure changes which will enable us to deliver smoother, faster and more efficient services for our customers.
<i>Directorate</i>	<i>Lead Officer</i>	We are seeking to improve digital connectivity in the borough and have been investigating options for delivering superfast broadband and fibre networks in Tower Hamlets. Tower Hamlets Homes will be nominating potential pilot sites to conduct non-intrusive surveys. Finalisation of the wayleave agreements by fibre operators and the council will permit the rollout of fibre across the council's social housing stock. An independent review of the telephony service has been completed and presented to senior staff in IT and Customer Services. Next steps will be decided soon.
Resources Directorate	Adrian Gorst	
<i>Portfolio Owners</i>	Cabinet Member for Resources and the Voluntary Sector	

<i>Strategic Plan activity</i>		<i>Note</i>
Action 11.4 	Develop a modern workforce within the Council through culture change	We have continued to develop our Organisation and Culture programme, which seeks to improve our organisational culture. Work over the last quarter has included the development of a revised staff awards scheme, targeted follow up with teams where engagement scores were low in the staff survey, and the design of 'temperature check' surveys which will be rolled out from November. A revised Personal Development Review (PDR), which seeks to enhance staff development, has also been implemented which includes a structured review of each member of staff's strengths and development needs in relation to the council's behaviours framework. Our Adult Social Care team has formally joined the Social Work Academy, which aims to inspire and develop the next generation of social workers in the UK. Collaboration with the Social Work Academy will ensure that we maximise joint learning and development opportunities.
<i>Directorate</i>	<i>Lead Officer</i>	
Resources Directorate	Amanda Harcus	
<i>Portfolio Owners</i>	Cabinet Member for Resources and the Voluntary Sector	

<i>Strategic Plan activity</i>		<i>Note</i>
Action 11.5	Embed Outcomes Based Budgeting across the Council	We are now using Outcomes Based Budgeting for our budget setting process for 2020-23. This enables the allocation of funding to best support the achievement of our strategic priorities and outcomes.
<i>Directorate</i>	<i>Lead Officer</i>	
Resources Directorate	Kevin Bartle	

Portfolio Owners	Cabinet Member for Resources and the Voluntary Sector	
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Strategic Plan activity		Note
Action 11.6	Deliver a programme of service reviews to improve operational effectiveness	<p>We have produced an initial scoping document outlining how we will conduct our Improvement & Efficiency Review on Human Resources – Sickness Absence. We have decided to postpone the review until December as we are trialling a new Sickness Absence Management software system called ‘First Care’. The First Care pilot has been launched in September and we hope it will improve productivity, streamline administrative processes and enhance the way we support our employees through sickness absence. The postponed review will analyse the effectiveness of the First Care pilot.</p> <p>Our Improvement & Efficiency review on market services is currently in its scoping stage. The review will focus on improving branding, marketing, appeal and offer of selected markets. It is expected to be completed in the next quarter. We will begin our review on Street Care after the completion on the markets review. Our reviews on Community safety and Special Education Needs and Disability (SEND) services will begin in 2020.</p>
Directorate	Lead Officer	
Governance Directorate	Sharon Godman	
Portfolio Owners	Executive Mayor	

Strategic Plan activity		Note
Action 11.7	Review business intelligence processes and procedures to support better outcomes for local people	<p>We have begun to develop our requirements specification for new business intelligence tools and I infrastructure with staff across the organisation. We will finalise this in the next quarter and assess different products to determine our future corporate business intelligence solution.</p> <p>As part of a bigger project to review all enabling functions in the council in line with our new target operating model, we have developed plans for a major exercise to understand how staff currently develop and supply business intelligence and data to services across the organisation.</p>
Directorate	Lead Officer	
Governance Directorate	Sharon Godman	
Portfolio Owners	Executive Mayor	

Strategic Plan activity		Note
Action 11.8	Change our approach to performance management to focus	We have now rolled out our outcome-based performance management arrangements for our Strategic Plan across the council. The delivery of our outcomes is overseen by delivery

	on better outcomes for residents	teams of officers from across the organisation, making sure we focus on what makes a difference to residents rather than our organisational structures. We are now using an outcome-based performance approach in the development and refresh of all strategies.
<i>Directorate</i>	<i>Lead Officer</i>	
Governance Directorate	Sharon Godman	
<i>Portfolio Owners</i>	Executive Mayor	

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<p>Cabinet</p> <p>27 November 2019</p>	 <p>TOWER HAMLETS</p>
<p>Report of: Neville Murton, Corporate Director Resources</p>	<p>Classification: Unrestricted</p>
<p>Revenue and Capital Budget Monitoring Quarter 2 2019-20</p>	

Lead Member	Councillor Ronald, Cabinet Member for Resources and the Voluntary Sector
Originating Officer(s)	Allister Bannin, Head of Strategic and Corporate Finance
Wards affected	All wards
Key Decision?	No
Forward Plan Notice Published	05/08/19
Reason for Key Decision	N/A
Strategic Plan Priority / Outcome	<p>1. People are aspirational, independent and have equal access to opportunities.</p> <p>2. A borough that our residents are proud of and love to live in.</p> <p>3. A dynamic outcomes-based Council using digital innovation and partnership working to respond to the changing needs of our borough.</p>

Executive Summary

This report introduces the budget monitoring report for Quarter 2. It includes details about General Fund revenue, Dedicated Schools Grant (DSG), Housing Revenue Account (HRA) and progress made against savings targets. It also includes capital change requests to approve changes to three existing schemes within the Council's capital programme.

Recommendations:

The Mayor in Cabinet is recommended to:

1. Note the Council's projected outturn position against General Fund, Dedicated Schools Budget and Housing Revenue Account budgets agreed for 2019-20, based on information as at the end of September as detailed in the Appendices.

2. Note and approve the three capital change notes, total of £8.962m to be added into the Council's capital programme, as detailed in Appendix 7.
3. Note that there are no equalities implications directly resulting from this report, as set out in Paragraph 4.

1 REASONS FOR THE DECISIONS

- 1.1 The Council could choose to monitor its budgetary performance against an alternative timeframe but it is considered that the reporting schedule provides the appropriate balance to allow strategic oversight of the budget by members and to manage the Council's exposure to financial risk. More frequent monitoring is undertaken by officers and considered by individual service directors and the Council's Corporate Leadership Team (CLT) including approval of management action.
- 1.2 To the extent that there are options for managing the issues identified these are highlighted in the report in order to ensure that members have a full picture of the issues and proposed solutions as part of their decision making.

2 ALTERNATIVE OPTIONS

- 2.1 The regular reporting of Revenue and Capital Budget Monitoring information through the year and the preparation of the provisional outturn position after the year end provides detailed financial information to members, senior officers and other interested parties on the financial performance of the Council. It sets out the key variances being reported by budget holders and the management action being implemented to address the identified issues.
- 2.2 Further information across the Council's key financial activities is also included to ensure that CLT and Members have a full picture to inform their consideration of any financial decisions set out in this report and also their broader understanding of the Council's financial context when considering reports at the various Council Committees.
- 2.3 Set alongside relevant performance information it also informs decision making to ensure that Members' priorities are delivered within the agreed budget provision.
- 2.4 It is important that issues are addressed to remain within the approved budget provision or where they cannot be contained by individual service management action, alternative proposals are developed and solutions proposed which address the financial impact; CLT and Members have a key role in approving such actions as they represent changes to the budget originally set and approved by them.

3 DETAILS OF THE REPORT

- 3.1 On 20 February 2019 the Council considered and agreed the Revenue Budget and Council Tax for 2019-20; and a capital programme showing resources available for investment in assets and infrastructure for ten years until 2028-29. The Council also agreed the Housing Revenue Account (HRA) budget from 2019-20 which includes rent setting and other charges.
- 3.2 The net budget requirement for 2019-20 has been set at £342.5m. The MTFP indicates a balanced budget for 2019-20, which includes delivering savings of £25.1m (£14.8m for 2019-20, and £10.3m slippage from previous years).
- 3.3 The General Fund is projecting a forecast overspend of £13.8m after the application of reserves and corporate contingency. Directorates are developing recovery plans to reduce this overspend and therefore reduce the requirement on General Fund reserves funding.
- 3.4 The Dedicated Schools Grant (DSG) is projecting a forecast overspend of £7.7m.
- 3.5 The Housing Revenue Account (HRA) is projecting a forecast underspend of £3.1m.
- 3.6 There are three capital change notes for this quarter and they are detailed in Appendix 7. The Mayor in Cabinet is recommended to approve the changes totalling £8.962m for inclusion in the Council's capital programme.

4 EQUALITIES IMPLICATIONS

- 4.1 There are no equality implications directly resulting from this report.

5 OTHER STATUTORY IMPLICATIONS

- 5.1 This section of the report is used to highlight further specific statutory implications that are either not covered in the main body of the report or are required to be highlighted to ensure decision makers give them proper consideration. Examples of other implications may be:
- Best Value Implications,
 - Consultations,
 - Environmental (including air quality),
 - Risk Management,
 - Crime Reduction,
 - Safeguarding.
 - Data Protection / Privacy Impact Assessment.
- 5.2 There are no other statutory implications contained in this report.

6 COMMENTS OF THE CHIEF FINANCE OFFICER

- 6.1 The attached report is primarily financial in nature and the financial implications of the issues raised have been included in the main report.

7 COMMENTS OF LEGAL SERVICES

- 7.1 The Council is required by section 151 of the Local Government Act 1972 to make arrangements for the proper administration of its financial affairs. The Council's chief finance officer has established financial procedures to ensure the Council's proper financial administration. These include procedures for budgetary control. It is consistent with these arrangements for Cabinet to receive information about the revenue and capital budgets as set out in this report.
- 7.2 The report also requests the allocation of funds into the capital budget and the Council has the legal power to do this should it so wish
- 7.3 There are no legal considerations required relating to the Equality Act 2010 arising from this report
-

Linked Reports, Appendices and Background Documents

Linked Report

- NONE.

Appendices

- A1 Budget Monitoring Report 2019-20 Q2
- A2 Capital Control Budget 2019-20 Q2
- A3 Revenue Control Budget 2019-20 Q2
- A4 Current Savings Performance 2019-22 Q2
- A5 Mayoral Priority Growth 2019-22 Q2
- A6 Current Capital Programme 2019-29 Q2
- A7 Capital change requests for approval 2019-20 Q2

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

- NONE.

Officer contact details for documents: N/A

Corporate Budget Monitoring Report

Quarter 2 2019-20

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Circulated to	Cabinet
Date	27 November 2019
Classification	Unrestricted
Report of	Corporate Director of Resources
Lead Member	CLr Ronald, Cabinet Member for Resources and the Voluntary Sector
Originating Officer(s)	Allister Bannin, Head of Strategic & Corporate Finance
Wards affected	All Wards
Key Decision?	No

General Fund forecast outturn variance £13.8m overspend

Dedicated Schools Grant (DSG) forecast outturn variance £7.7m overspend

Housing Revenue Account (HRA) forecast outturn variance £3.1m underspend

£m	2019-20 Forecast Outturn Variance			2019-20 Annual Figures		Figures to 30 September 2019	
	Estimated impact on General Fund GF/ DSG/ HRA	Variance before reserve adjustments	Contribution to /(from) Reserves	Current Budget ⁽¹⁾	Forecast Outturn Position	Budget to Date	Actual
Children & Culture (GF)	11.6	12.2	(0.6)	98.3	109.9	49.2	55.1
Resources	2.1	10.1	(8.0)	15.2	17.3	7.6	27.6
HA&C	4.1	4.8	(0.7)	106.7	110.8	53.4	60.5
Place	-	-	-	70.0	70.0	35.0	26.5
Governance	-	0.8	(0.8)	15.4	16.2	7.7	10.4
Corporate	(4.0)	(4.0)	-	2.8	(3.7)	1.4	6.0
General Fund	13.8	23.9	(10.1)	308.4	320.5	154.3	186.1
Ring-fenced Items							
Children's (DSG)	-	7.7	(7.7)	-	7.7	-	85.2
Public Health	-	-	-	34.1	34.1	17.1	5.8
HRA	-	(3.1)	3.1	36.7	33.6	(24.1)	(27.3)
Overall Position	13.8	28.5	(14.7)	379.2	395.9	147.3	249.8

Conventions: The use of brackets denotes either an income budget or a positive variance (underspend).

Note 1: The current budget reflects the original budget approved by Members in February 2019 adjusted for any subsequent approved budget virements. The budget history is included as Appendix 3.

In February 2019 the Council approved a revenue budget of £342.5m (including Public Health ring-fenced expenditure budget) which was to be financed by external funding sources such as council tax, business rates, grants and drawdown from the Council's Earmarked and General Fund reserves.

The current position is estimated to be a £13.8m overspend on the general fund after the application of £10.1m from reserves.

The HRA is currently projected to show additional income of £3.1m. This is demonstrated by the income from dwelling rents being forecast to be higher than budgeted due to lower levels of Right to Buy sales than was assumed when the budget was set, and void rates are also lower than anticipated.

The MTFP outlined for 2019-20 approved savings of £14.8m in order to deliver a balanced budget. An additional £10.3m relating to slippage from previous years must also be achieved. Therefore in total £25.1m of savings are to be delivered.

Quarter 2 2019-20

This report shows the quarter 2 position (as at the end of September) for the financial year. Forecasts at quarter 2 demonstrate an overspend on the general fund of £13.8m. Directorates are developing recovery plans to reduce these overspends and therefore reduce the requirement on general fund reserves funding.

£13.8m Overspend on General Fund: after application of transformation reserves.

£25.1m Savings: our total savings requirement for the current year taking into account slippage from earlier years; we believe that £6.1m will slip into future years and that £3.4m is at risk.

£325m Approved Capital budget: original allocation of £263m, slippage from previous years of £16m and quarters 1 & 2 adjustments of £46m.

£598m Collectable income: Total we expect to collect in total for Council Tax and Business Rates

£306m Treasury Investments: a strategy for delivering additional income which was included in the budget proposals is well advanced.

Forecast outturn variance £11.6m General Fund overspend

Forecast outturn variance £7.7m DSG overspend

£m	Forecast Outturn Variance			Annual Figures		Figures to 30 September 2019	
	Estimated impact on General Fund (GF)	Variance before reserve adjustments	Contribution to /(from) Reserves	Current Budget ⁽¹⁾	Forecast Outturn Position	Budget to Date	Actual
Children’s (GF)	11.6	12.2	(0.6)	98.3	109.9	49.2	55.1
Children’s (DSG)	-	7.7	(7.7)	-	7.7	-	85.2

The general fund is projected to be overspent by £12.2m. The overspend is as follows: Children’s Social Care £2.9m, Special Educational Needs £1.7m, Youth Services & Commissioning £1.5m, Children’s Resources £1.3m and Sports, Leisure and Culture £0.6m.

Unachievable savings of £3.3m (Early Years £2.4m and SEND £0.9m) and slipped savings of £1.0m (Youth Services and Commissioning) are included in the £12.2m overspend.

C&C have a recovery action plan in place that currently suggests a reduction in the forecast overspend to £10.2m before drawdown from reserves of £0.6m (£0.5m for Ofsted and £0.1m to fund one term of EMA as Mayor 3 year funding ended at the end of 2018/19).

The Children’s Social Care Ofsted inspection was completed in June 2019. The inspection was positive and resulted in a movement to a “Good” rating. This formal conclusion of the “intervention and monitoring” phase of strengthening services to children means that we are now at a point where we need to “Right-size” the budget for Children’s Social Care.

The local growth in SEND, which is not matched by growth in funding, is resulting in budget pressures that are reflected nationally. A range of measures have been put in place to reduce the spending against the general fund as well as the High Needs Funding Block element of the DSG which will show impact over time and actions are being scoped to reduce pressures in the short term during the current financial year.

Details of the significant variances on the General Fund are shown below.

(in numerical descending order)

£m **Forecast variance commentary**

Children’s Social Care

2.9 Much work has been undertaken over the past 12 months to put in place arrangements to reduce the numbers of agency Social Workers and to recruit and retain our own staff. The launch of the Social Work Academy and our continuing work with regard to the recruitment of experienced staff have had a positive impact on ensuring that staff turn-over is much reduced. This programme of work is spread over a three year plan and will continue over the next two years.

1. CSC - Staffing £1.0m
Agency workers – pressure reducing as permanent staff are recruited.

However we still require an experienced cohort of staff to maintain a level of experience and knowledge so that our more complex work can be allocated to those staff with the appropriate level of experience. Therefore, although staff cost pressures are reduced, they will continue for the next 12 months. £0.5m of this overspend relates to extra staffing spend for Ofsted improvement work and will be requested to be funded from transformation reserves.

2. CSC - Looked After Children (LAC) Placements £1.2m

Work continues to reduce high cost placements

The forecast for the placement budget is based on LAC modelling and sufficiency strategy outcomes. There has been an increase of £0.6m in costs since 2018/19 outturn. Re-commissioning is expected to reduce costs. Reductions are being sought through the regular Panel that scrutinises receptions into care and prioritises placements within our own cohort of foster-carers. LAC Placements have stabilised over the past 12 months however like other LA's we experienced increased placement costs. . The placements budget has 2019-20 savings of £0.3m allocated against Adoption & Fostering. This will be fully achieved.

3. CSC – Leaving Care £0.9m

Additional demands

£1m one-off growth in 2018-19 has now ended. We will review the effectiveness of the "Through Care" team in September 2019. Cumulative funding pressure as a result of responsibilities for increase UASC and change in legislation for LA responsibilities for up to age 25. In addition responsibilities for providing accommodation for Dubbs Children.

4. CSC – Mental Health and Disability Services (£0.4m)

Forecast underspend

Underspends within Mental Health and Disability Services will be held to offset other pressures within CSC.

Special Educational Needs

Continued increase of transportation costs. Includes £0.9m unachievable savings.

2.6 This is an ongoing pressure that is likely to increase. Grant Thornton has been commissioned to undertake a deep dive in order to understand the reasons and to recommend actions to address. Their recent report highlights the service is underfunded as there is no annual review to take account of demand, but alongside this during 2018-19 a retendering process resulted in an additional circa £0.8 pressure rather than a saving. Initial recommendations from GT have been discussed with elected members prior to moving forward on the final action plan to reduce cost, which will involve possibly controversial policy changes. No cost reductions are expected this financial year.

Early Years

Unachievable Savings

2.4 These savings are unachievable in 2019-20 due to pressures on Early Years budgets.

Contract Services

Full review of service

1.7 Options for the future delivery of Contract Services were presented to Cabinet in February 2019. The options included recommendations intended to reduce pressures on the budget for this service, including withdrawal of Secondary school catering, withdrawal from schools contract cleaning, a review of adults' welfare meals, and a review of primary schools SLAs. All recommendations were accepted by Cabinet; and an action plan is now in place to reduce pressures. However, the action plan will have a phased impact during 2019/20 with fully delivery from 2020-21.

Free School Meals

Forecast underspend

(0.1) The Mayors Free School Meal Programme now has an agreed Memorandum of Understanding (MoU) between LBTH and Primary schools, which sets conditions for the programme. This is expected to reduce the £0.5m pressure in 2018/19 to a slight underspend in 2019/20.

Sports Leisure & Culture

0.6 Recovery action plan proposes reducing spend against AEG income by £0.6m to offset pressures within this service. The action plan provides full details.

Building and Technical services

0.4 This overspend is the cost of providing security and NNDR charges for vacant buildings.

PFI

A successful bid was made for a new senior level PFI post which would ensure full compliance and integration with the range of council services which have a bearing on PFI. This post is in the Procurement Service structure, in Resources directorate and will be recruited to in the near future. School leaders are reporting pressures to budgets as a result of the payments due for the PFI. Detailed work around the extent of the pressures across

Grouped Schools is currently being undertaken. One of the key drivers for the pressures relates to pupil numbers coming in lower than had been originally forecast. This drove the design specification of the PFI sites, therefore resulting in a situation where a number of schools are receiving lower than forecast pupil funding, whilst having unoccupied PFI buildings/classrooms which need to be paid for.

The Dedicated Schools Grant (DSG)

£m The key impact on the DSG is the significant overspend in the High Needs Funding Block element. The actions being taken to address this are outlined below.

High Needs Block (HNB)

7.7 The Council are required to provide to the DfE a recovery plan that articulates how the overspend on the High Needs Funding Block (HNFB) will be addressed over the period 2019 – 2022 through:

- significantly reducing the funding retained by LBTH to deliver support services,
- reducing the demand for centrally retained funding for Alternative Provision,
- reducing the rate of increase in EHC plan numbers,
- a reduction across all school top-up payments

All of the above are also fully detailed in the C&C Recovery Action Plan.

The DfE published indicative High Needs Block funding allocations on 11/10/19 which demonstrate an increase in funding for 2020-21 of £7.3m, from the 2019-20 allocation of £50.8m to 58.1m for 2020-21. This increase in funding would decrease the overspend pressure for 2020-21.

Forecast outturn variance £2.1m overspend

£m	Forecast Outturn Variance			Annual Figures		Figures to 30 September 2019	
	Estimated impact on General Fund (GF)	Variance before reserve adjustments	Contribution to/(from) Reserves	Current Budget ⁽¹⁾	Forecast Outturn Position	Budget to Date	Actual
Resources	2.1	10.1	(8.0)	15.2	17.3	7.6	27.6

The Resources directorate has a net budget of £15.2m. It is currently forecasting an outturn of £25.3m of which £8.0m of funding has been previously approved from the ICT Transformation Reserve leaving a potential directorate overspend of £2.1m.

The Resources directorate leadership team is reviewing all savings delivery across the directorate to identify mitigating actions to fully eliminate the estimated overspend.

Actual spend to date includes costs relating to Housing Benefit which will be offset by income.

Details of the areas at risk of overspending and mitigations are summarised below.

(in numerical descending order)	£m	Forecast variance commentary
Customer Access Savings slippage	0.9	Savings slippage due to delayed implementation of the Customer Access model of £1.2m, partially mitigated by holding temporary vacancies.
Human Resources Phase 2 review slippage	0.6	Savings slippage on phase 2 of the HR review of £0.7m, partially mitigated by holding temporary vacancies and reducing non-pay expenditure.
Business Support Phase 2 review slippage	0.9	Phase 2 of the business support review will take place one year after the full implementation of phase 1 which is in the recruitment and implementation stage. Slippage of £1m is partially mitigated by holding periods of vacancy.
Revenues Service One-off mitigation	(0.3)	One-off write back of credit balances.

Other comments

Use of Reserves	Approximately £8.0m will be required from the ICT Transformation reserve to fund ICT Transformation projects which were agreed by Cabinet in 2017-18.
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Forecast outturn variance £4.1m overspend on the General Fund

£m	Forecast Outturn Variance			Annual Figures		Figures to 30 September 2019	
	Estimated impact on General Fund (GF)	Variance before reserve adjustments	Contribution to / (from) Reserves	Current Budget ⁽¹⁾	Forecast Outturn Position	Budget to Date	Actual
HA&C	4.1	4.8	(0.7)	106.7	110.8	53.4	60.5
Public Health	-	-	-	34.1	34.1	17.1	5.8

The Health, Adults and Community directorate forecast outturn for 2019-20 is for a £4.1m overspend after use of reserves. This position is driven by growing pressures in adult social care. The main variances are summarised below.

The 2019-20 budgets include £3.4m of savings, including £0.7m of savings from prior years. The directorate is forecasting to achieve £2.6m (76%) of these savings in 2019-20. The main area of slippage is in learning disability services (Supporting Independence programme). 100% of these savings remain achievable and work continues to deliver as much as possible this year.

A recovery plan has been developed to address the pressures being faced by the directorate, which focuses on opportunities to make sustainable changes that will lead to an ongoing reduction in expenditure, as well as one-off activities. The recovery plan is regularly reviewed and updated and requires more actions to fully close the forecast variance.

(in numerical descending order)

£m

Forecast variance commentary

Adult Social Care & Integrated Commissioning

An overspend due to demand for residential and community-based care services for disabled, mental health and older people.

4.4 The forecast outturn variance is a £4.4m overspend against a net budget of £100.9m.

The forecast overspend is caused by pressures in both residential/nursing placements and community based services supporting service users in their own homes. These overspends are a continuation of the pressures seen and reported in the 2018-19 Outturn report. Similar pressures in adult social care budgets are reported by authorities nationally.

The time-limited "Unpaid Invoice Hub" is still in operation and continuing to work through operational issues associated with the billing arrangements and electronic systems which support home care. This work has enabled improvements to reporting on planned & actual homecare delivery by providers. These reporting improvements have enabled more detailed forecasting to be undertaken, resulting in a £1m increase to forecast expenditure compared to the Quarter 1 report. The council currently provides around 31,000 hours of homecare per week.

There has been a net increase of 19 residential care packages since the start of the financial year, which has led to a £0.5m increase in the forecast from Quarter 1. Further work is being undertaken to review the data and cases in detail, to provide a full understanding of the reasons for placement in residential care. Extra care housing (an alternative to a residential home placement) is available in the borough which is generally a better, more cost effective option for residents needing additional support who cannot remain in their own home.

An increase of £0.8m is forecast on direct payments expenditure compared to the Quarter 1 position. This is based on an increasing upward trend in the value of direct payments made on a monthly basis. Whilst the number of direct payments has increased, this growth in expenditure appears larger than expected and without a corresponding reduction in home care costs. Additional work is underway to look at this as it appears the average size of direct payments is increasing.

A recovery plan to reduce the forecast level of overspend has been developed and is regularly reviewed and monitored. The Council has utilised in full the short-term grants provided by central government to support pressures in social care and these are not sufficient to fully cover the pressures. Operationally, a "Practice and Quality Forum" is in place which encourages reflection on social work practice, giving consideration to how preventative and strength-based interventions can promote wellbeing and focus on improved outcomes for adults. Panels for signing off placements and care packages have also been put in place to increase control on costs. Where possible vacancies are also being held across the directorate and measures taken to minimise all staffing and non-pay budgets. The use of agency staff has reduced significantly and is carefully controlled.

Community Safety

An underspend due to delays in police deployment of officers

(0.3) The forecast outturn variance is a £0.3m underspend against a net budget of £6.4m. This is after the allocation of an expected £0.7m funding for the Partnership Task Force (Council funded Police Officers), from the Mayor's Investment Priorities earmarked reserve.

The majority of the underspend is in relation to the general fund element of the Partnership Task Force (£0.2m), due to delays in police deployment of officers.

Public Health

Breakeven position with the grant forecast

- It is currently forecast that the public health grant will be fully utilised in 2019-20.

Forecast outturn variance Nil Variance

£m	Forecast Outturn Variance			Annual Figures		Figures to 30 September 2019	
	Estimated impact on General Fund (GF)	Variance before reserve adjustments	Contribution to /(from) Reserves	Current Budget ⁽¹⁾	Forecast Outturn Position	Budget to Date	Actual
Place	-	-	-	70.0	70.0	35.0	26.5

The Place Directorate has budgetary provision of £70m and is expecting to outturn in line this budget, nil variance. This position is exclusive of a Parking surplus of £1.5m. The use of this surplus is tightly controlled through s55 of the Road Traffic Regulation Act 1984 and places restrictions on the activities that can be funded from it. As this surplus is unavailable to offset general overspend within Place it has been excluded from the budget monitoring position reported.

Despite there being a nil variance, there are a number of significant pressures within the Directorate which have been mitigated by offsetting savings. Pressures have been forecast within Planning & Building Control, Resources, Markets and Asset Management. Compensatory savings have been identified within Housing and Public Realm.

Unachievable savings of £0.08m and slipped savings of £0.4m are included within the overspend position.

Details of the significant variances are outlined below:

in numerical descending order	Variance £m	Forecast variance commentary
Corporate Property & Capital Delivery Reduction in income from occupation of Jack Dash House; Staffing costs; Business Rate inflation; additional saving from appropriation of shops	0.7	<p>A pressure of £0.8m resulting from loss of rent following Tower Hamlets Homes move from Jack Dash House in July 2018. This budgetary pressure will continue until a new tenant is secured or the property is put to a different use or disposed of.</p> <p>Costs are being incurred in relation to ensuring the security of vacant buildings whilst decisions and processes are completed around their future usage. Previously an overspend was reported which is now being contained within the wider corporate property service.</p> <p>Accruals totalling £0.1m for agency staff within the Asset Management team were not completed at the end of 2018/19. Timesheets were submitted to the agent but not charged back to the Council until after the deadline for inclusion in the accounts. As a result these costs will have to be met in 2019/20.</p> <p>Business Rate expenditure on Council owned property managed within the corporate landlord model is forecast to exceed budget by £0.2m. This relates to the annual inflation of costs for which there is no budgetary provision.</p> <p>The appropriation of shops from the Housing Revenue Account to the General Fund should yield a net income stream of £1.2m. The budget saving assigned to the appropriation is £0.8m, resulting in an underspend of £0.4m. The additional revenue appears to result from a greater number of assets transferring than was built into the original specification.</p> <p>There is a significant reliance being placed on the use of agency staff within the Corporate Property and Capital Delivery teams. The majority of work relates to</p>

the HRA and capital programme and is therefore recharged, which provides ongoing staffing flexibility in terms of variable capital delivery commitments. It is forecast that the recharges will be significantly higher than budgeted to reflect the high agency costs which will result in the general fund salary costs being in line with budgetary provision

Resources
Reduced income at Kemnal Park Cemetery

0.2 Budget pressure of £0.2m in respect of Kemnal Park Multi-Faith Cemetery as a result of demand for burial plots not meeting originally estimated levels. Marketing continues to take place to highlight the availability of plots but is not effectively increasing uptake. This overspend has previously been met from corporate resources and if agreed again for the current year will mitigate the overspend within the Place Directorate. The expectation and agreement was that whilst the cemetery was transferred into the Place Directorate, the £0.2m would be met centrally.

Planning & Building Control
Fees in relation to Planning Appeals;
Planning Income

0.6 One off legal fees and costs currently estimated at £0.3m relating to an appeal following refusal of planning application for the Westferry Printworks site. LBTH has required significant specialist Counsel and expert witness representation due to the technical, complex and accelerated nature of the appeal.

Current income projections for planning fees are forecast to under recover by £0.5m. However this position is demand driven and a small number of large planning applications could significantly improve this position. Pre-application fees are forecast to over recover by £0.2m, giving a net projected overspend on Planning income of £0.2m

It is hoped that large planning applications at Canary Wharf (Wood Wharf scheme) and Commercial Road will be submitted in year, which would mitigate this overspend. This income has currently not been included within the forecast as there is uncertainty around the timing of applications.

There is a background concern Brexit will significantly impact on income but there is no firm evidence to suggest planning activity is being adversely affected at present although activity is levelling off. This will continue to be monitored throughout the year.

Growth & Economic Development
Breakeven position expected

- The Growth and Economic Development restructure was implemented on 1 July 2019. The budget is based on the new structure and as a result the delays in implementation have resulted in additional cost and overspend. This will be managed in-year by drawing on more of the approved s106 allocation to fund the additional cost, resulting in a balanced position.

Additional costs from delays to restructuring being offset by additional funding

Mayoral Priority Growth was incorporated within the budget in 2018-19. Due to the re-profiling of projects, the funding was not fully spent. The balanced budget position is predicated on this funding totalling £1.2m being available and utilised in the current year.

Public Realm
Over achievement of parking income from bay suspensions and permits; security costs and low income levels in Markets; Savings in rechargeable works and vacant posts

(0.1) Parking income is projected to over achieve budgeted levels by £1.5m. The additional income results from a variety of factors, the main ones being that the current budget includes loss of income resulting from several large suspensions covering multiple years which have not come to fruition and the early introduction of permits for car clubs and casual parking. These savings are one off and not expected to recur in future years.

The use of Parking surpluses is tightly controlled through s55 of the Road Traffic Regulation Act, 1984. As a result, this surplus will be excluded from the overall Place monitoring position as it cannot be used to subsidise general overspends.

Markets are projected to overspend by £0.3m. This overspend is caused by a number of factors including security costs, in particular around Columbia Road and Brick Lane markets (£0.1m), reduced income primarily at Petticoat Lane and Whitechapel Road markets (£0.1m), staffing costs and unbudgeted revenue costs resulting from the implementation of the PSI (combined £0.1m overspend). This overspend will be mitigated through a drawdown from the street trading reserve resulting in a balanced position at year-end.

There is a £0.1m underspend within Public Realm Management as a result of a vacant post within the management structure.

The outsourced waste collection and Trade Waste services are projecting to spend in line with budget. These services will be brought back in-house in 2020/21. A budget of £2.5m has been identified for this mobilisation project and spend is projected to be in line with this budget allocation over the next two years.

The retendering of the waste disposal contract has resulted in a reduced budget provision of £1m. This saving has been delivered and based on current tonnages the waste disposal service is forecasting to breakeven in line with the revised contract.

There is a projected underspend of £0.2m Highways & Traffic Management rechargeable works. Highway development works were completed in 2018/19 but no s278 drawdown took place from reserves. As a result the costs were incurred in the previous year and service will benefit from the recharge in the current year. This drawdown will be on top of the rechargeable works undertaken in year.

The Environmental Regulatory Service is forecasting to underspend by £0.1m as a result of vacant posts.

Additional income from Landlord Licensing and HMO (House in Multiple Occupation) is being profiled to be allocated over the life of each licence issued. Income is received up front and drawn down over the five years it is valid to cover costs incurred. No variance is forecast.

Housing & Regeneration
Slippage of savings proposal through improved utilisation of I.T and delivery of housing through Capital Letters. Over recovery of income relating to T.A. acquisitions; Additional income from the common housing register

(1.4) Based on current activity and unit cost data, the Homelessness and Temporary Accommodation services are forecasting to underspend by £1.6m. Despite homeless numbers increasing, the saving results from additional income relating to acquisitions and a resultant reduction in the need for expensive nightly booked and bed & Breakfast accommodation. This forecast is inclusive of grant drawdowns totalling £1.348m in year to cover specific activity including rough sleepers, homelessness reduction act and flexible homelessness support.

A savings target of £0.1m will slip into 2020/21 reducing the Homelessness and Temporary Accommodation underspend. The saving relates to the acquisition of properties through the pan London Capital Letters programme. The company is now live and in the market to procure property but the benefit derived from this will not impact in the current financial year.

The Housing Options Lettings service is forecasting to underspend by £0.4m as a result of income from Registered Social Landlords (RSL's) exceeding budgeted targets as a result of the RSL's using the Council's common housing register and a charge being made to them for this service.

A £0.3m savings target within the Housing options lettings service will not be delivered in 2019/20. This savings target relates partly to automating applications to the common housing register and also a review of the allocations policy, both of which will be implemented in year but the associated benefit will

not be realised until the following year.

There is a forecast overspend of £0.2m within Housing Regeneration as a result of historic unachievable income targets being carried forward into the 2019/20 budget. It is anticipated that a full budget review will take place across the Place Directorate with a view to mitigating this overspend in future years.

Forecast breakeven position after reserves drawdown

£m	Forecast Outturn Variance			Annual Figures		Figures to 30 September 2019	
	Estimated impact on General Fund (GF)	Variance before reserve adjustments	Contribution to/(from) Reserves	Current Budget ⁽¹⁾	Forecast Outturn Position	Budget to Date	Actual
Governance	-	0.8	(0.8)	15.4	16.2	7.7	10.4

The Governance directorate estimated impact on the general fund is nil, subject to the expected drawdown of £0.6m transformation reserve transitional funding for Strategy, Policy and Performance (SPP) and a further estimated £0.2m from the Children’s Services Ofsted Improvement budget for strategic improvement work carried out by SPP.

The 2019-20 budgets include £0.05m of savings which the directorate is forecasting to achieve in full.

Other comments

Electoral Services

The European elections in May 2019 were grant funded. The costs of any by-elections would require use of identified corporate contingency funds.

Registrar Services

The move to St George’s Town Hall in early 2020 will provide increased income earning opportunities.

Legal Services

The use of external legal services is being reviewed to reduce costs and the Council has joined frameworks for barristers and solicitors.

Communications

The communications division is reviewing the potential for street advertising income.

Forecast outturn variance of £4.0m underspend

£m	Forecast Outturn Variance			Annual Figures		Figures to 30 September 2019	
	Estimated impact on General Fund (GF)	Variance before reserve adjustments	Contribution to/(from) Reserves	Current Budget ⁽¹⁾	Forecast Outturn Position	Budget to Date	Actual
Corporate and financing costs	(4.0)	(4.0)	-	2.8	(3.7)	1.4	6.0

The corporate and financing costs area is forecasting an underspend of £4m. This is demonstrated by the centrally held non-pay inflation budget, corporate contingency and slippage in cross-directorate savings.

Details of the variances are summarised below:

(in numerical descending order)	£m	Forecast variance commentary
Non-pay inflation Budget for contractual inflation in directorates	(3.4)	The budget for contractual (non-staffing) inflation is held centrally, pending the evidencing of pressures by directorates.
Corporate contingency Budget to cover unforeseen circumstances	(3.1)	The centrally held budget (£3.1m) is forecast to help offset current overspend pressures across the Council.
Cross-Directorate Savings Slippage in savings achievement	2.5	Slippage in cross-directorate savings held centrally, being £1.5m slippage in Debt Management & Income Optimisation and £1.0m slippage in the Review of Printing/Scanning/Use of Multi-Functional Devices (MFD's).

£m	Forecast Outturn Variance			Annual Figures		Figures to 30 September 2019	
	Contribution to / (from) HRA	Contribution to / (from) Reserves	Outturn Variance before Adjustments	Revised Budget	Forecast Outturn Position	Budget to Date	Actual
HRA	3.1	-	(3.1)	36.7	33.6	(24.1)	(27.3)

The overall forecast for the Housing Revenue Account is a £3.1m underspend. The main component of this is from £1.8m additional dwelling rent income above budget.

(in numerical descending order)	Variance £m	Forecast variance commentary
Dwelling rent income	(1.8)	Rental income is currently forecast to be higher than budget due to lower void rates than assumed when this budget was set, along with a lower level of Right to Buy sales than forecast when the budget was set.
Additional income recovered		
Leasehold service charge income	(1.3)	The annual actualisation of service charges has seen an additional £1.1m of leasehold service charge income in the HRA. In addition some additional income is forecast to be received in relation to tenant service charges.
Additional income recovered		
Other Issues		
Capital Financing charges		The 2019/20 budget assumes that there will be a large Revenue Contribution to Capital Outlay (RCCO) made from HRA revenue resources to finance the 2019/20 HRA capital programme. If all this budget is not required to fund the HRA capital programme in 2019/20, or if it is deemed more appropriate to use other HRA resources to fund the HRA capital programme then the RCCO will be lower than budgeted; any such underspend will carry forward in HRA balances.
Tower Hamlets Homes (THH) Delegated: Special Services, Rents, Rates & Taxes/ Supervision & Management/ Repairs & Maintenance		Although small net variances are currently being projected on the delegated budgets managed by Tower Hamlets Homes, some large demand led services are managed within this area, including the Repairs and Maintenance budget outlined above. These budgets are closely monitored in order that demand pressures are identified and financial implications addressed.

Capital expenditure: **Table 5.1**

	Forecast (under)/ over spend for year	Spent to date vs Budget		This year's fig (£m)		
		This year (Q2)	Last year (Q2)	Projection for year	Annual budget	Spent to date
		£m A = D - E	% B = F/E	% C	£m D	£m E
Housing Revenue Account	(63.5)	13%	6%	44.5	108.0	14.0
Corporate	(1.5)	24%	11%	39.8	41.3	10.1
Children and Culture	(26.7)	12%	19%	31.9	58.6	6.8
Place	11.1	49%	38%	107.9	96.7	47.1
Health, Adult, Communities	(7.4)	0%	0%	6.1	13.5	0.05
Resources	(5.4)	9%	0%	1.1	6.5	0.6
Total	(93.3)	24%	19%	231.3	324.7	78.7

We've spent 24% of budget as at month 5, compared to 19% at month 5 last year. As per last year, we expect a higher proportion of spend later on in the financial year. We still however project slippage of £93.3m, but any unspent budget will be spent in future years rather than the current year. A new group (the Capital Governance Working Group) has been set up, this will support arrangements on the governance and administration of the capital programme, including the review of spend and slippage.

Below is detail of projected variances.

	(Under)/ overspend £m	
Basic Need/Expansion	(10.303)	London Dock School has recently been approved and works were profiled to start in 19-20, however the revised start date is anticipated for early 20-21.
Purchase of properties for use as Temporary Accommodation and purchase of s106 properties	35.030	Accelerated spend is being undertaken in order to limit the amount of interest payable on Right to Buy one for one receipts. Budget will be brought forward from future years.
Establish a Housing Wholly-Owned Company	(5.0)	This represents the Council's equity investment in the housing company. The process of establishing the company has started and the first acquisitions are anticipated later this financial year.
Phase 2b Mixed Tenure Schemes (1-4-1)	(16.029)	Half of the budget was currently unallocated to schemes, they have been confirmed, with spend expected in 2019/20. However there may be a need to re-profile some of the schemes in light of approval dates.

Housing Pipeline Schemes Phase 2a (1-4-1)	(25.679)	Half of the budget was currently unallocated to schemes, they have been confirmed, with spend expected in 2019/20. However there may be a need to re-profile some of the schemes in light of approval dates.
Community Benefit Society – 1-4-1 Receipts	(4.5)	A company, Mulberry Housing Ltd has been set up. Potential properties have been identified and purchase is being progressed.
Housing Capital Programme	(11.690)	The housing capital programme currently has a possible 252 schemes that it can complete in the 2019/20 programme. The £19mill above is from 133 schemes that are fully approved. This leaves 119 schemes in the Housing capital programme, and also all of the schemes in fuel poverty works, that are 'at risk' of not being approved/completed in 2019/20. The reason for 'at risk' is that there may be a delay in getting contracts approved.

Capital receipts: **Table 5.2**

	This year
	£m
Dwellings sold under Right to Buy (RTB)	
Receipts from RTB sales	3.2
Less: poolable amount paid to DCLG	(0.8)
Sale of other HRA assets	
Preserved Right to Buy receipts	0.4
20 Alton Street	0.4
Sale of General Fund assets	
Wayside Gardens	1.9
	-
Total	5.1

Receipts shown gross before costs of sale are deducted

Current projections will :

This table shows the balance on the general fund, HRA and useable reserves held for the previous 2 years as well as showing the projected impact on reserves for 2019-20.

Reduce our General Fund Reserve by £13.8m

The 2018-19 financial accounts are under audit and adjustments to the statements and notes will be required; some of these adjustments will change the reserves position. At this stage the final impact on reserves is still being identified. A final outturn report will be prepared, and this will include the final reserves position.

Increase our HRA by £3.1m**Reduce our Earmarked Reserves by £10.1m**

	Balance at 31 March 2018	Draft Balance at 31 March 2019	Contribution (to) / from Reserve	Projected Balance 31 March 2020
	£m	£m	£m	£m
General Fund Reserve	33.3	21.2	13.8	7.4
Housing Revenue Account (HRA)	47.6	54.6	(3.1)	57.7
Schools' Balances (DSG)	23.4	23.4	-	23.4
Earmarked Reserves	118.5	116.9	10.1	106.8
Total Usable Reserves	222.8	216.1	20.8	195.3

	Balance at 31 March 2018	Draft Balance at 31 March 2019	Contribution (to) / from Reserve	Projected Balance 31 March 2020
£m	£m	£m	£m	£m
Earmarked reserves consist of				
Transformation	15.0	8.4	1.4	7.0
ICT / Finance Systems	21.0	16.3	8.0	8.3
Other	0.9	0.9		0.9
Parking Control	3.3	3.3		3.3
Building Control	0.2	0.2		0.2
Land Charges	0.7	0.7		0.7
Insurance	21.2	21.2		21.2
Public Health Grant	1.3	1.7		1.7
New Civic Centre	17.2	17.2		17.2
New Homes Bonus	12.1	28.9		28.9
Free School Meals	4.0	4.0		4.0
Mayor's Investment Priorities	7.0	4.6	0.7	3.9
Risk Reserve	8.8	4.4		4.4
Revenue Grants	1.7	1.7		1.7
Mayor's Tackling Poverty Reserve	4.1	3.4		3.4
Totals	118.5	116.9	10.1	106.8

Target for year £25.1m

£m	Saving Target	19-20 Target	Prior Year Slippage	Forecast Savings	Slippage	Under Recovery	Over recovery
	A = B + C	B	C	(D = E + F + G) = A	E	F	G
				✓	✗	✗	✓
Children and Culture	5.0	3.4	1.6	0.7	1.0	3.3	-
HA&C	3.4	2.7	0.7	2.6	0.8	-	-
Place	3.0	2.5	0.5	2.5	0.4	0.1	-
Governance	0.1	0.1	-	0.1	-	-	-
Resources	2.8	0.5	2.3	2.1	0.7	-	-
All	10.8	5.6	5.2	6.1	4.7	-	-
Total	25.1	14.8	10.3	14.1	7.6	3.4	-

tick: a higher level of confidence that savings are on track to be delivered.

cross: either timing issues, i.e. slippage into future years, or at risk of non-delivery.

Total savings target for 2019-20 is £25.1m (£14.8m relates to approved savings for the 2019-20 year, and £10.3m as a result of previous year savings not delivered)

- £14.1m is identified as being on track to deliver savings;
- A net position of £7.6m is forecast to slip into future years due to timing issues;
- £3.4m has been identified as unachievable; this is mainly in the Children and Culture areas of Early Years and Special Educational Needs & Disabilities (SEND).

This section shows the amount of money we have collected from tax payers of the borough, and the split between the amount that is retained and the amounts paid over to central and government and the GLA.

NNDR

We are expected to collect £464m for 2019-20.

We are expected to collect £464m in Business Rates. To the end of September we have collected £267m (58%).

At the end of the previous year there was also an outstanding debt of £20m relating to historic periods. Of this £10m (50%) has been collected.

Under the 2019-20 75% Retention Pilot arrangements we retain 48% of the total sums collected; any surplus over the baseline will be paid to central government (tariff) and City of London for administering the pilot.

Council Tax

We are expected to collect £134m for 2019-20.

We are expected to collect £134m in Council Tax. We are on target to achieve this with £64m (48%) having been collected by the end of September.

CT is split between

Government 23%,
LBTH 77%

We also have historic Council tax debt of £19m at the end of last year. Of this we have collected £3m (16%).

Overall Position

For this period our portfolio totals £306m, and we are current receiving an average return of 0.95%.

We have £306m of investments.

£60m of LOBO loans repaid, and replaced by PWLB loans.

Following the repayment of the £60m LOBO loans we are holding £83m (27%) in Money Market Funds. About 55% (£169m) of the outstanding investments (including Money Market Funds) have less than 3 months until they mature. Of the remaining £137m, £37m (12%) will mature in less than 1 year and the remaining £100m (33%) of investments are held for periods longer than 12 months.

Income Position

At the start of the year we budgeted £4m investment income, and we are broadly on target.

Budgeted income of £4m.

Benchmarking

We compare favourably for the return we get from our internally managed funds, but at present we do not hold external investments.

According to the information we receive from our advisors, Arlingclose, we are out-performing both a group of London councils and a group of national local authorities (averaging 1.01% on internally invested funds against a local authority benchmark of 0.85%).

In time we intend to invest more heavily in longer term options including more equities.

We are continuing to look at alternatives that retain and protect the capital value of our investment. Our Treasury Management advisors are investigating options which will balance the risks and rewards whilst including Equity, Bonds and Property in the portfolio.

Inflation

Inflation is eroding the value of our investments.

At the moment the Consumer Prices Index (CPI) inflation is running at 1.7%, and therefore the average return of 0.95% is lower. This means that the future value of the funds invested today will be less. The move of some funds into externally managed pooled funds is designed to improve this position.

(Actuary Report due 4-6 weeks after the relevant Quarter end date – latest information relates to Q1)

Fund underperformed over the quarter.	The Fund underperformed its benchmark return of 3.24% by 0.84% for the quarter.
Five mandates matched or achieved benchmark set.	<p>For this quarter, five mandates matched or achieved returns above the set benchmark. The five that did not achieve the benchmarks were the mandates with *LCIV BG (DGF), LCIV BG (GE), Insight and *GSAM bond portfolios.</p> <p>Fund Valuation of £1.560bn, a £35m increase over the quarter.</p>
Fund underperformed over twelve months.	For the twelve months to September 2018, the Fund returned 7.81% marginally underperforming the benchmark of 7.88%, the Fund is behind its benchmark by 0.07%.
Four mandates matched or achieved benchmark set.	Four mandates underperformed their respective benchmark. The mandates that underperformed their respective benchmarks were *LCIV RF lagged behind by 1.66%, *LCIV BG (DGF) lagged behind by 2.45%, *GSAM lagged behind by 6.34% and Insight by 7.82%.
Fund is broadly in line with the strategic benchmark weight.	<p>Looking at the longer term performance, the three year return for the Fund was 12.45%, above its benchmark return by 0.54% for that period. Over the five years, the Fund posted a return of 9.42% outperforming the benchmark return of 9.19% by 0.23%.</p> <p>The Fund remains in line with its long term strategic equity asset allocation and the distribution of the Fund's assets amongst the different asset classes is broadly in line with the strategic benchmark weight.</p>

*LCIV BG (DGF) – fund manager is Baillie Gifford and investment is Diversified Growth Fund, LCIV BG (GE)- fund manager is Baillie Gifford and investment is Global Equity, LCIV RF – fund manager is Ruffer, *GSAM – Goldman Sachs Asset Management

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Appendix 2: Capital Control Budget 2019-20 Q2	Total	Health, Adults & Community	Children & Culture	Place	Resources	Corporate	Housing Revenue Account
	£m	£m	£m	£m	£m	£m	£m
Original Budget (Council, February 2019)	262.557	11.998	36.944	63.663	1.888	62.824	85.240
Slippage from 2018-19	16.369	1.369	4.915	(16.064)	0.384	(1.482)	27.247
Cabinet Approvals							
Biodiversity, community gardening, horticulture	0.040		0.040				
Bow South – Temporary Pheonix SEN provision	10.700		10.700				
Capital Footway & Carriage Programme	14.197			14.197			
Children's House Nursery - Extension and Toilets Refurbishment	0.650		0.650				
Clichy Estate	1.000						1.000
Early Learning for 2 Year OldsCapital Funding 2018-20	1.000		1.000				
Gascoigne Greening Project	0.301			0.301			
ICT End User Computing (EUC) Transformation Project	4.200				4.200		
Interim Depot Strategy	0.615			0.615			
Liveable Streets Programme	2.000			2.000			
Local Infrastructure Initiatives	1.900			1.900			
Middlesex Street Regeneration Programme	0.403			0.403			
Montefiore Centre Refurbishment Programme (initial requirement)	1.013			1.013			
PLACE - Indicative Schemes - Investment works to LBTH Assets	0.924			0.924			
Quality Parks	1.070		1.070				
Roman Road West Regeneration Programme	0.705			0.705			
Signage, interpretation, heritage	0.050		0.050				
South Dock Bridge	0.110			0.110			
St Georges Town Hall Refurbishment Programme (initial requirement)	1.282			1.282			
Street Trees	0.333			0.333			
The A12 Acoustic Barrier	0.100			0.100			
Waste and Cleansing IT Systems	0.750			0.750			
PLACE - Indicative Schemes - Investment work LBTH Assets Mech & Elec	1.305			1.305			
Budget Reprofile							
Arnhem Wharf - Damp Issues	(0.344)		(0.344)				
Arnold Road - 1-4-1 receipts	(0.091)						(0.091)
Barnsley East	0.014						0.014
Ben Johnson Neighbourhood	0.100			0.100			
Berner Centre Demolition	(0.217)						(0.217)
Brick Lane Regeneration	0.157			0.157			
Chrisp St Corridor	0.100			0.100			
Community Benefit Society - 1-4-1 receipts	(4.500)						(4.500)
Cycle Strategy 2017	0.100			0.100			
HRA - Indicative Schemes – RP Grant Scheme	(3.466)			(3.466)			
ICT Infra - Beatrice Tate	(0.041)			(0.041)			
ICT Infra - Swanlea	(0.149)			(0.149)			
ICT Infra - Harpley PRU	(0.063)			(0.063)			
ICT Infra - Oaklands	(0.149)			(0.149)			
ICT Infr-Cent Foundation	(0.299)			(0.299)			
ICT Infr-Sir John Cass	(0.276)			(0.276)			
PLACE - Indicative Feasibility Schemes - Asset Maximisation	0.245			0.245			
PLACE - Indicative Schemes - Carbon Offsetting	0.740			0.740			
Purchase of properties for use as Temporary Accommodation and purchase of s106 properties	26.910			26.910			
RP Grant Scheme - East End Homes	(0.716)			(0.716)			
RP Grant Scheme - Family Mosaic	(1.052)			(1.052)			
RP Grant Scheme - Swan	0.855			0.855			
TfL LIP to be Allocated	(0.564)			(0.564)			
Other Adjustments							
1-4-1 Leaseholder Buybacks	(0.059)						(0.059)
21 Wapping Lane	(0.021)			(0.021)			
30 Challoner Walk	0.027			0.027			
Alfred Street Garages	0.150						0.150

Appendix 2: Capital Control Budget 2019-20 Q2	Total	Health, Adults & Community	Children & Culture	Place	Resources	Corporate	Housing Revenue Account
	£m	£m	£m	£m	£m	£m	£m
Alliston House OAP Club	(0.010)			(0.010)			
Angela Court	0.025						0.025
Arnhem Wharf - Expansion	0.014		0.014				
Artichoke Pub Site	0.004			0.004			
Ashington House	0.513						0.513
Bancroft Library Boiler replacement	(0.021)			(0.021)			
Bangabandhu Primary School - Re-roofing Phase 2	(0.025)		(0.025)				
Beatrice Tate - Replace Default Pipework	0.023		0.023				
Bethnal Green Cottage	0.010			0.010			
Bethnal Green Gardens	(0.045)		(0.045)				
Bethnal Green Library - Investment works	0.029			0.029			
Bethnal Green Town Centre-T&H	(0.003)			(0.003)			
Bigland Green - Heating pipework	(0.014)		(0.014)				
Bigland Green - Replace H&C Pipework PH2	(0.011)		(0.011)				
Boroughwide Road Safety -T&H	0.007			0.007			
Bow School - Expansion	0.012		0.012				
Bow Secondary School - 6th Form Extension	(0.094)		(0.094)				
Brick Lane Mural	(0.009)		(0.009)				
Burnham St Community Centre	(0.010)			(0.010)			
Bus Improvement - 21 Wapping Lane	0.021			0.021			
Bus Priority Funding 2018/19	(0.030)			(0.030)			
Bus Stop Accessibility Prog	0.007			0.007			
Cemetery Park Lodge (Phase 2)	(0.013)		(0.013)				
Cherry Tree Special Needs Primary School- Replace hot and cold water system	(0.006)		(0.006)				
CHI - Indicative Schemes - Conditions and Improvement	0.086		0.086				
CHI - Indicative Schemes - Health and Wellbeing	0.155		0.155				
Children's House Nursery - 2 Year Old Accommodation	0.470		0.470				
Children's House Nursery School - Additional Accommodation	0.500		0.500				
Christ Church Gardens	(0.001)		(0.001)				
City Gateway - Gateway Tots	(0.011)		(0.011)				
Community Hubs/Buildings	0.008			0.008			
Cressy Place	0.008						0.008
Cubitt Town J&I - Hot and Cold Pipework	0.078		0.078				
Cyril Jackson (North) - Replace Boiler and Calorifier	0.039		0.039				
Cyril Jackson (South) - Replace Main School Boilers / Replace Nursery Boiler	(0.017)		(0.017)				
Disabled Facilities Grants	0.298			0.298			
Edward Mann Close	0.008						0.008
Extensions - GLA Pipeline Fund	(1.197)						(1.197)
Frimley Way	0.150						0.150
George Green School - Boiler Replacement	0.089		0.089				
George Green's - 6th form Expansion	0.021		0.021				
George Green's - Hygiene Room	0.001		0.001				
Glasshouse Community Hall - external concrete & window repairs	0.007			0.007			
Gorsefield - Accessible Room & Bathroom	(0.005)		(0.005)				
Halley - Hygiene Room	(0.005)		(0.005)				
Halley - Intruder Alarm & Fire Alarm Upgrade	0.011		0.011				
Halley - Toilet Refurbishment	0.002		0.002				
Halley Primary School - Replace Distribution Boards	(0.010)		(0.010)				
Harpley School - Additional Accommodation	0.006			0.006			
Harry Gosling Primary - Hot and cold pipework	0.133		0.133				
Hermitage - Drainage Phase 2	(0.002)		(0.002)				
Hermitage Primary School - Re-roofing Phase 2	(0.001)		(0.001)				
Housing Zone – Complementary Measures	0.001			0.001			
HRA - Indicative Schemes - Pipeline Schemes	(0.595)						(0.595)
Ian Mikardo High Special Needs School - Roofing	0.000		0.000				

Appendix 2: Capital Control Budget 2019-20 Q2	Total	Health, Adults & Community	Children & Culture	Place	Resources	Corporate	Housing Revenue Account
	£m	£m	£m	£m	£m	£m	£m
Improve the look and feel of Tower Hill Terrace	0.010		0.010				
Improving Air Quality	0.050			0.050			
Inclusive Playgrounds (initial requirement)	0.550		0.550				
John Scurr Primary - Lift Access	0.092		0.092				
John Scurr Primary School - Fire Alarm Upgrade	(0.002)		(0.002)				
King Edward Memorial Park	(0.002)		(0.002)				
Lahana Place	0.012						0.012
Langdon Park BMX	0.033		0.033				
Lawdale Primary - Hot & Cold Water Pipework	0.122		0.122				
Lawdale Primary - Roofing Work	0.085		0.085				
Leadenham Court council buildings garages into TA Phase 1	0.012			0.012			
Legible London 2017	0.050			0.050			
Limehouse Cut / St Annes Row	(0.003)			(0.003)			
Local Accessibility	0.015			0.015			
Locksley Estate - Housing Covenant (Site D)	0.091						0.091
Malmesbury - Replace boiler and water generator	(0.008)		(0.008)				
Manorfield Primary - Hot and Cold Water Pipework	0.133		0.133				
Marner - Re-roofing Phase 2	(0.003)		(0.003)				
Marner Primary School - Sports Pitch	(0.011)		(0.011)				
Mayflower - Update boiler controls	(0.010)		(0.010)				
Mayflower Primary - Hot and Cold Water Pipework	0.140		0.140				
Mile End Road	(0.039)		(0.039)				
Mile End Stadium Astro-turf Development	0.006		0.006				
Millwall Park & Langdon Park	0.002		0.002				
Mitigating ASB Quality Parks Prog	0.110		0.110				
Morpeth Secondary School - Damp Wall Works	0.015		0.015				
Motor Cycle Parking	0.010			0.010			
Motor Cycles in Bus Lanes	0.011			0.011			
Mowlem Primary - Hot and Cold Water Pipework	0.078		0.078				
Nelson Street - 4 Units	0.008						0.008
PDC Bethnal Green - Local presence	0.012			0.012			
Pocket Parks Project Ropewalk Gardens	(0.006)		(0.006)				
Poplar Park	(0.003)		(0.003)				
Provision for 2 year olds - Whitehorse One O'clock Club	(0.030)		(0.030)				
Provision for New Schemes	(20.050)					(20.050)	
Provisions - Statutory Duty	(0.500)		(0.500)				
Quietway 6: Bancroft Road / Warley Street	0.006			0.006			
Quietway 6: Holton Street / Grantley Street	0.000			0.000			
Quietway 6: Old Ford Road / Armagh Road	0.060			0.060			
Quietway 6: Roman Road / Cardigan Road / Arbery Road	0.000			0.000			
Raine House Wapping Community Centre	(0.087)			(0.087)			
Road Safety 2017	0.107			0.107			
Rooftops Feasibility	0.037						0.037
RP Grant Scheme - ARHAG Housing Association	0.005			0.005			
RP Grant Scheme - George Greens' Almshouses	0.084			0.084			
RP Grant Scheme - Peabody	0.001			0.001			
Schools Urgent Works	0.878		0.878				
Seven Mills - Hygiene Room	0.015		0.015				
Seven Mills - Roof Phase 1	(0.045)		(0.045)				
Seven Mills - Roof Phase 2	0.300		0.300				
Seven Mills Primary - Replace Boiler	0.022		0.022				
Shapla - Replace H&C controls	0.116		0.116				
Shapla Primary School - Hygiene Room	(0.007)		(0.007)				
Short Life Properties	0.016						0.016
Smithy Street - Hot and Cold Water Pipework	0.136		0.136				

Appendix 2: Capital Control Budget 2019-20 Q2	Total	Health, Adults & Community	Children & Culture	Place	Resources	Corporate	Housing Revenue Account
	£m	£m	£m	£m	£m	£m	£m
Smithy Street- Fire Door Works	0.020		0.020				
Smithy Street School - Lead Pipework Replacement	0.002		0.002				
St. Andrews Community Centre	0.060			0.060			
Stepney - 6th Form Expansion	(0.127)		(0.127)				
Sustainable Drainage Scheme	0.015			0.015			
Tackling ASB Driving	0.040			0.040			
TfL Local Transport - Various	(0.012)			(0.012)			
The Cherry Trees School - New Entrance & Family Support Facility	(0.005)		(0.005)				
The Oval Space	0.004		0.004				
TRAMSHED Digby Greenway Community Centre	(0.008)			(0.008)			
Tree planting - Isle of Dogs	(0.012)			(0.012)			
Underground Refuse Service Vehicles	0.025			0.025			
Various - Scheme Development	0.127		0.127				
Vawdrey Close	0.008						0.008
Victoria Park - Pools Playground Improvement	0.009		0.009				
Victoria Park Sports Hub	0.002		0.002				
Watney Market TRA	0.010			0.010			
Weavers Field Pre-School	(0.012)		(0.012)				
Wick Lane	0.150						0.150
William Cotton Place - Fit Out	0.118	0.118					
WoodWharf - Primary Healthcare Facility for the Isle of Dogs (S106/Cil)	0.058	0.058					
Woolmore Primary School Expansion	0.020		0.020				
Workspace fit-out works to Bethnal Green Library	(0.008)			(0.008)			
Q1 & 2 Total Adjustments	45.750	0.176	16.751	49.143	4.200	(20.050)	(4.470)
Revised 2019-20 Budget	324.675	13.543	58.610	96.742	6.472	41.292	108.017

Appendix 3: Revenue Control Budget 2019-20 Q2

	Total General Fund	Health, Adults & Community	Children & Culture	Place	Governance	Resources	Corporate Costs and Central Financing
Gross Expenditure Budget	825,397,342	170,574,338	153,824,619	181,385,602	23,011,988	282,802,146	13,798,649
Gross Income Budget	(482,837,038)	(30,639,665)	(54,145,545)	(108,489,017)	(8,314,523)	(270,265,288)	(10,983,000)
Nex Expenditure Budget	342,560,304	139,934,673	99,679,074	72,896,585	14,697,465	12,536,858	2,815,649
Growth Reallocation - PFI Enforcement Officer	0		(85,000)			85,000	
Transfer of Community and Enforcement Teams	0	2,904,353		(2,904,353)			
Transfer of Legal Budget	0		(695,800)		695,800		
Centralisation of Business Support	0	(1,368,000)				1,368,000	
Centralisation of Learning and Development Training Budget	0		(569,714)		(15,841)	585,555	
Centralisation of Finance - Transfer of Brokerage Finance Team	0	(621,242)				621,242	
Total Adjustments	0	915,111	(1,350,514)	(2,904,353)	679,959	2,659,797	0
Revised Net Expenditure Budget	342,560,304	140,849,784	98,328,560	69,992,232	15,377,424	15,196,655	2,815,649

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MTFS Savings Tracker 2019-22 as at 30 September 2019 - Summary

2019-20						
Savings target	Slippage from previous year	Revised Savings target	Delivered / cashed	Forecast savings	Variance - Slippage	Variance - Under / (over) delivery
£'000	£'000	£'000	£'000	£'000	£'000	£'000

2020-21					
Savings target	Slippage from previous year	Revised Savings target	Forecast savings	Variance - Slippage	Variance - Under / (over) delivery
£'000	£'000	£'000	£'000	£'000	£'000

2021-22					
Savings target	Slippage from previous year	Revised Savings target	Forecast savings	Variance - Slippage	Variance - Under / (over) delivery
£'000	£'000	£'000	£'000	£'000	£'000

Directorate

Health, Adults & Community	2,752	679	3,431	781	2,594	837	-
Children and Culture	3,443	1,550	4,993	450	645	1,000	3,348
Place	2,456	530	2,986	1,351	2,506	400	80
Governance	50	-	50	50	50	-	-
Resources	525	2,250	2,775	-	2,075	700	-
Cross-Directorate	5,619	5,248	10,867	258	6,177	4,690	-

	1,190	837	2,027	1,751	-	276	
	1,800	1,000	2,800	1,950	250	600	
	3,080	400	3,480	2,780	-	700	
	-	-	-	-	-	-	
	2,770	700	3,470	2,570	300	600	
	5,750	4,690	10,440	10,440	-	-	

	1,700	-	1,700	1,700	-	-	
	300	250	550	550	-	-	
	329	-	329	329	-	-	
	-	-	-	-	-	-	
	200	300	500	200	-	300	
	5,630	-	5,630	5,630	-	-	

Total	14,845	10,257	25,102	2,890	14,047	7,627	3,428
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Total	14,590	7,627	22,217	19,491	550	2,176	
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Total	8,159	550	8,709	8,409	-	300	
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Savings Achievement Status

Savings Delivered / On Target	6,067	319	6,386	2,539	6,206	100	80
Savings Slipping but Achievable	6,959	8,359	15,318	351	7,791	7,527	-
Not Deliverable / Not Achievable	1,819	1,579	3,398	-	50	-	3,348

	14,590	100	14,690	12,490	300	1,900	
	-	7,527	7,527	7,001	250	276	
	-	-	-	-	-	-	

	8,159	300	8,459	8,159	-	300	
	-	250	250	250	-	-	
	-	-	-	-	-	-	

Total	14,845	10,257	25,102	2,890	14,047	7,627	3,428
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Total	14,590	7,627	22,217	19,491	550	2,176	
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Total	8,159	550	8,709	8,409	-	300	
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Reference	PMO Project Reference	Directorate	Service Area	Title	Savings Achievement Status	Year Approved	2019-20										2020-21					2021-22						
							Savings target	Slippage from previous year	Revised Savings target	Delivered / cashed	Forecast savings	Variance - Slippage	Variance - Under / (over) delivery	Forecast Savings RAG	Project Status RAG	Status update	Savings target	Slippage from previous year	Revised Savings target	Forecast savings	Variance - Slippage	Variance - Under / (over) delivery	Savings target	Slippage from previous year	Revised Savings target	Forecast savings	Variance - Slippage	Variance - Under / (over) delivery
							£'000	£'000	£'000	£'000	£'000	£'000	£'000				£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
D&R001/17-18		Place	Planning & Building Control	Responding to Competition in Planning	Savings Delivered / On Target	2017-18	76		76				Green	Green	1. Saving is being delivered through an increase in pre-application planning fees. New fee structure in place and volumes being monitored to ensure additional income is received.													
SAV / PLA 001 / 19-20		Place	Planning & Building Control	Street Naming & Numbering Fee Restructure	Savings Delivered / On Target	2019-20	100		100				Green	Green	1. Saving is being delivered through a new fee structure that has been introduced. Delivery will be determined by income received for street naming and numbering. Income is being monitored to confirm the saving will be delivered in full.													
SAV/ PLA 04 / 18-19		Place	Public Realm	Street Lighting Efficiencies	Savings Delivered / On Target	2018-19									1. Saving is in 2020-21.	180		180										
CLC001/17-18		Place	Public Realm	Waste Management Contract Efficiencies	Savings Delivered / On Target	2017-18	1,000		1,000	1,000	1,000		Green	Green	1. Delivered through renegotiation of the waste disposal contract price.													
SAV/ PLA 01 / 18-19		Place	Public Realm	Waste, Recycling & Street Cleansing Contract	Savings Delivered / On Target	2018-19									1. Saving is in 2020-21.	200		200			200							
SAV/ PLA 05 / 18-19		Children and Culture	Sport Leisure and Culture	Review of Parks	Savings Delivered / On Target	2018-19									1. Saving is in 2020-21.	300		300										
SAV / PLA 006 / 19-20		Place	Waste - Public Realm	Waste Fleet Alternative Funding	Savings Delivered / On Target	2019-20									1. Saving is in 2020-21.	1,800		1,800										
SAV / ALL 004 / 19-20		Governance	Various Support Services	Reduction in Enabling and Support Services Costs	Savings Delivered / On Target	2019-20	50		50	50	50		Green	Green	1. Achieved through staffing efficiencies in Democratic Services.													
RES002/17-18	SS09-ASS	Resources	Benefits	Benefits Service Admin Savings	Savings Delivered / On Target	2017-18	525		525	525	525		Green	Amber	1. Work underway to understand the potential for further savings from centralisation of financial assessments.													
RES006/17-18		Cross-Directorate	All	Functional Consolidation of Procurement	Savings Slipping but Achievable	2017-18		250	250	250	250		Green	Green	1. Achieved as part of the finance restructure.													
SAV/ RES 01 / 18-19		Resources	Benefits	Improved Recovery of Housing Benefits Overpayments	Savings Delivered / On Target	2018-19									Savings are from 2020-21.	500		500			500							
SAV/ RES 06 / 18-19		Resources	Corporate Finance	Finance Services – Process improvements and new Finance System Implementation	Savings Delivered / On Target	2018-19									Savings are from 2020-21.	100		100										
SAV/ RES 10 / 18-19		Resources	Customer Access	Additional Local Presence Efficiencies	Savings Delivered / On Target	2018-19									Savings are from 2020-21.	300		300			300			300		300		
SAV/ RES 08 / 18-19		Resources	Housing	Income Through Housing Companies	Savings Delivered / On Target	2018-19									Savings are from 2020-21.	250		250										
SAV/ RES 09 / 18-19		Resources	Housing	THH - Potential support service Savings	Savings Delivered / On Target	2018-19									Savings are from 2020-21.	100		100										
SAV/ RES 02 / 18-19		Resources	Human Resources	HR Services - Additional Staffing Efficiencies	Savings Delivered / On Target	2018-19									Savings are from 2020-21.	100		100			100							
SAV/ RES 05 / 18-19		Resources	ICT	ICT Savings	Savings Delivered / On Target	2018-19									Savings are from 2020-21.	750		750										
SAV / RES 001 / 19-20		Resources	Revenue Services	Improvements in Self Service and Digital uptake for Council Tax and Business Rates	Savings Delivered / On Target	2019-20									Savings are from 2021-22.							200		200				
SAV / RES 002 / 19-20		Resources	Revenue Services	Reduction in Funding for Discretionary Rates Relief	Savings Delivered / On Target	2019-20									Savings are from 2020-21.	220		220										
SAV / RES 04 / 18-19		Resources	Revenue Services	Revenue Services – Workforce efficiencies through greater self-service and automation	Savings Delivered / On Target	2018-19									Savings are from 2020-21.	100		100										
SAV / RES 03 / 18-19		Resources	Risk Assessment	Internal Audit – Streamline Management and Explore Shared Service Options	Savings Delivered / On Target	2018-19									Savings are from 2020-21.	50		50										
SAV / RES 07 / 18-19		Resources	Wi-Fi Concession Contract	Income Through Wi-Fi Concession Contract	Savings Delivered / On Target	2018-19									Savings are from 2020-21.	300		300			300							
SAV/ CORP 01 / 18-19		Cross-Directorate	All	Treasury Management Investment Opportunities	Savings Delivered / On Target	2018-19		258	258	258	258		Green	Green	1. Investment was commenced in July 2018, full-year effect now achieved in 2019-20.													
SAV/ CORP 02 / 18-19		Cross-Directorate	All	Contract Management Efficiencies	Savings Delivered / On Target	2018-19									Savings are from 2020-21.	4,250		4,250			4,250							
ALL002/17-18		Cross-Directorate	All	Fees & Charges	Savings Delivered / On Target	2017-18	419		419	419	419		Green	Green	1. These savings have been achieved through inflationary uplifts in directorate fees and charges income budgets.													
ALL004/17-18		Resources	Corporate Finance	Centralisation of Finance	Savings Slipping but Achievable	2017-18		1,000	1,000	1,000	1,000		Green	Green	1. Finance restructure has been completed.													
ALL010/17-18		Cross-Directorate	All	ICT Centralisation	Savings Delivered / On Target	2017-18	400		400	400	400		Green	Green	1. Centralisation of application support was carried out but for a reduced number of staff. 2. Other savings have been achieved from contracts.													
SAV / ALL 006 / 19-20		Cross-Directorate	Cross-Directorate - Various	Mainstream Grants (MSG) Alternative Delivery Model	Savings Delivered / On Target	2019-20									Savings are from 2021-22.							330		330		330		
SAV / ALL 005 / 19-20		Cross-Directorate	Cross-Directorate / Place / Children's Services - Asset Management	Asset Management Service	Savings Delivered / On Target	2019-20									Savings are from 2021-22.							500		500		500		
SAV / ALL 007 / 19-20		Cross-Directorate	Cross-Directorate / Resources - All	Greater Commercialisation	Savings Delivered / On Target	2019-20									Savings are from 2020-21.	1,000		1,000			1,000			1,500		1,500		
SAV / ALL 002 / 19-20		Cross-Directorate	Cross-Directorate / Resources - Risk and Audit	Counter Fraud Initiatives	Savings Delivered / On Target	2019-20									Savings are from 2021-22.							100		100		100		
SAV / ALL 003 / 19-20		Cross-Directorate	Cross-Directorate / Resources - Various	Contract Management	Savings Delivered / On Target	2019-20									Savings are from 2020-21.	500		500			500			1,000		1,000		
SAV / ALL 001 / 19-20		Cross-Directorate	Cross-Directorate / Resources - Various	Phase 2 Local Presence - putting Digital First	Savings Delivered / On Target	2019-20									Savings are from 2021-22.							700		700		700		
SAV / ALL 004 / 19-20		Cross-Directorate	Cross-Directorate / Resources - Various Support Services	Reduction in Enabling and Support Services Costs	Savings Delivered / On Target	2019-20									Savings are from 2021-22.							1,500		1,500		1,500		
Savings Delivered / On Target							6,067	1,569	7,636	2,539	7,456	100	80				14,590	100	14,690	12,490	300	1,900	8,159	300	8,459	8,159	300	
Savings Slipping but Achievable																												
ADU008/17-18		Health, Adults & Community	Adult Social Care	Day Opportunities Provision	Savings Slipping but Achievable	2017-18	140	100	240	240	240		Amber	Amber	1. Savings delivery being reviewed through Adult Social Care Programme Board.													
ADU003/17-18	FS03-SIN	Health, Adults & Community	Adults Social Care	Helping People with Learning Disability live Independently	Savings Slipping but Achievable	2017-18	619	550	1,169	332	837		Red	Red	1. Savings delivery being reviewed through Adult Social Care Programme Board and Supporting Independence working group. 2. Mitigation plan being finalised.		837	837	561		276							
ADU007/17-18		Health, Adults & Community	Adults Social Care	Improving Employment Support for Adults with Disabilities	Savings Slipping but Achievable	2017-18	100	29	129	129	129		Amber	Amber	1. Some savings will potentially slip due to procurement timelines, however mitigations will be put in place.													

Reference	PMO Project Reference	Directorate	Service Area	Title	Savings Achievement Status	Year Approved	2019-20										2020-21						2021-22										
							Savings target	Slippage from previous year	Revised Savings target	Delivered / cashed	Forecast savings	Variance - Slippage	Variance - Under / (over) delivery	Forecast Savings RAG	Project Status RAG	Status update	Savings target	Slippage from previous year	Revised Savings target	Forecast savings	Variance - Slippage	Variance - Under / (over) delivery	Savings target	Slippage from previous year	Revised Savings target	Forecast savings	Variance - Slippage	Variance - Under / (over) delivery					
							£'000	£'000	£'000	£'000	£'000	£'000	£'000				£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000				
CHI002/17-18	FS04-EHH	Children and Culture	Youth Services and Commissioning (should be CSC not Y&C)	Better support for families through early help, and reduction in social care demand	Savings Slipping but Achievable	2017-18	1,000		1,000			-	1,000		-	Red	Red	1. This will not be achieved in 2019-20. 2. Savings are due to come from multiple workstreams and a phase 2 restructure of the team, which will achieve part year savings in 2020-21 and full year in 2021-22.		1,000	1,000		750	250				250	250				
D&R008/16-17		Place	Corporate Property & Capital Delivery	Generating more income from council assets	Not Deliverable / Not Achievable	2016-17		50	50		50		-		-	Red	Red	1. The original saving related to revenues generated from the rental of street furniture that was anticipated from the exclusive concession award for Wi-Fi and small cell. This approach has now been abandoned based on legal advice received and the Wi-Fi project put on hold. The digital connectivity programme now concerns itself primarily with delivering broadband into social housing and this has been ratified by the Digital Portfolio Board. 2. An alternative means of delivering the saving has been identified through utilising the logistics team income. This team carries out various elements of internal rechargeable works around staff moves, logistical works and events and will deliver the £50k savings target.															
D&R002/17-18		Place	Housing Options	Maximising use of technology in Housing Options Service	Savings Slipping but Achievable	2017-18	300		300				300		-	Green	Red	1. Saving will not be delivered in 2019-20. The saving target relates to automating applications to the Common Housing Register. The on-line application process has recently gone live but a back log in assessments has required additional resourcing and negates any saving in-year. The allocations policy review is due to go to Cabinet in early 2020, following a public consultation process. Together these two changes should reduce the workload on the lettings team, resulting in savings in 2020/21.		300	300		300										
CLC007/16-17		Place	Public Realm	Review of Enforcement Function- More Generic Working	Savings Slipping but Achievable	2016-17		351	351	351	351				-	Green	Red	1. Mayoral growth funding has been agreed for 2019-20 and used to offset this original savings target which has not been achieved.															
CLC008/16-17		Place	Public Realm	School Crossing Patrols to be delivered by Schools	Savings Slipping but Achievable	2016-17		89	89		89				-	Green	Red	1. Alternative savings have been achieved to mitigate this saving which was not achieved.															
ALL009/17-18	SS02-BSH	Cross-Directorate	All	Consolidation of Business Support and Administration Functions	Savings Slipping but Achievable	2017-18		1,000	1,000				1,000		-	Red	Amber	1. The consultation closed on 29 March 2019. Implementation is occurring in 2019-20.		1,000	1,000		1,000										
ALL003/17-18	SS03-IC	Cross-Directorate	All	Debt Management & Income Optimisation	Savings Slipping but Achievable	2017-18	1,500	1,500	3,000		1,500	1,500			-	Red	Red	1. Validation of saving delivery is being completed. One-off initiatives are being used to partially achieve the savings in 2019-20.		1,500	1,500		1,500										
RES001a/17-18		Resources	Human Resources	Human Resources	Savings Slipping but Achievable	2017-18		1,250	1,250		550	700			-	Red	Red	1. Restructure has been implemented in HR, but savings target will not be achieved in full. Alternative ways of achieving the saving are being considered.		700	700		700										
RES001b/17-18		Cross-Directorate	All	Human Resources	Savings Slipping but Achievable	2017-18	2,000		2,000		2,000				-	Amber	Amber	1. Previous year savings of £2.5m have been achieved through procurement of a less-expensive agency intermediary provider. 2. Training and development previous year savings have been achieved. 3. Remaining £2m savings target relates to terms and conditions changes which are under consultation.															
ALL006/17-18	SS01-CS SS05-LP	Cross-Directorate	All	Local Presence / Contact Centre Review	Savings Slipping but Achievable	2017-18	800	1,250	2,050		850	1,200			-	Red	Amber	1. Delay in implementation of the new customer access model. Working to validate the exact impact of delays in Idea Store closure and changes to establishment figures on potential savings from channel shift.		1,200	1,200		1,200										
ALL001/17-18	SS04-RPG SS06-MPS	Cross-Directorate	All	Review of Printing/ Scanning/ Use of Multi-Functional Devices (MFD's)	Savings Slipping but Achievable	2017-18	500	990	1,490		500	990			-	Red	Red	1. The MFD and Reprographics elements of the project are currently in delivery. 2. Printing and scanning savings are being reviewed.		990	990		990										
Savings Slipping but Achievable							6,959	7,159	14,118	351	6,591	7,527									7,527	7,527	7,001	250	276			250	250	250			
Not Deliverable / Not Achievable																																	
CHI005/17-18	FS05-SEN	Children and Culture	Learning & Achievement	Better targeting of services for children with special educational need and disabilities (SEND)	Not Deliverable / Not Achievable	2017-18	740	200	940				940		-	Red	Red	1. £200k saving was achieved in Educational Psychology Service. 2. Remaining £940k is unachievable on general fund (relate to DSG funding).															
CHI003/17-18		Children and Culture	Learning & Achievement	Increasing the involvement of partners in Early Years services	Not Deliverable / Not Achievable	2017-18	1,079	1,329	2,408				2,408		-	Red	Red	1. Local Authority day nurseries have closed, which reduces pressure in DSG. Savings do not impact general fund.															
Not Deliverable / Not Achievable							1,819	1,529	3,348				3,348																				
Total							14,845	10,257	25,102	2,890	14,047	7,627	3,428									14,590	7,627	22,217	19,491	550	2,176		8,159	550	8,709	8,409	300

Appendix 5: Mayoral Priority Growth 2019-22 as at 30 September 2019

Reference	Directorate	Title	Strategic Priority Outcome	Revenue (One Off)					Revenue (Ongoing)					Capital					Housing Revenue Account					Status update				
				2019-20 £'000	2019-20 Forecast £'000	2020-21 £'000	2021-22 £'000	Total £'000	2019-20 £'000	2019-20 Forecast £'000	2020-21 £'000	2021-22 £'000	Total £'000	2019-20 £'000	2019-20 Forecast £'000	2020-21 £'000	2021-22 £'000	Total £'000	2019-20 £'000	2019-20 Forecast £'000	2020-21 £'000	2021-22 £'000	Total £'000					
MGRO CHI 2-17	Children's Services	Children's Centre commissioning of voluntary and community sector (VCS) organisations	2. Children and young people are protected so they can realise their potential	120	120			120																				Outreach service provided by the Voluntary Sector for 'hard to reach' families, including the summer programme.
MPG / ALL 002 / 19-20 (b)	Children's Services	Community Safety, Violence, Exploitation and Serious Organised Crime	7. People live in safer neighbourhoods and anti-social behaviour is tackled					-	182	182	4	4	190															£70k of the growth is for the Childrens Exploitation Team. This will be fully spent in 2019-20
MPG/ CHI 03 / 18-19	Children's Services	Continuing to provide universal free school meals	2. Children and young people are protected so they can realise their potential	2,000	2,000	2,000		4,000																				£2m for free school meals for primary schools. This will be fully spent in 2019-20
MPG/ CHI 001 / 19-20	Children's Services	Early Years - Conception to Age 13	4. Inequality is reduced and people feel that they fairly share the benefits from growth					-	1,000	1,000			1,000															The £1m will be fully spent in 2019-20 across early years services. The allocation is for 3 years only funded from the Community Subsidy Grant.
MPG/ CHI 02 / 18-19	Children's Services	Early Years Provision Victoria Park and St Hilda's Community Centre	2. Children and young people are protected so they can realise their potential	31	31	31		62																				This will be fully spent in 2019-20
MGRO CLC 5-17	Children's Services	Provision of four new outdoor gyms to improve health outcomes to all parts of the community	3. People access joined-up services when they need them and feel healthier and more independent					-							27	27												This is expected to be fully spent in 2019-20
Children's Services Total				2,151	2,151	2,031		4,182	1,182	1,182	4	4	1,190	27	27	-	-	-	-	-	-	-	-	-	-	-		
MPG/ HAC 02 / 18-19	Health, Adults and Community	Additional Police officers for Neighbourhoods	7. People live in safer neighbourhoods and anti-social behaviour is tackled	800	689	800		1,600																				The Partnership Task Force (PTF) is a joint initiative between the council and the Metropolitan Police. At the end of October there will be 20 constables and 2 sergeants working in Tower Hamlets as a result of this scheme. Up to this point the PTF have been operating at 50% expected staffing levels.
MPG/ PLA 06 / 18-19	Health, Adults and Community	ASB & Crime Neighbourhood Management	7. People live in safer neighbourhoods and anti-social behaviour is tackled	200	135	200		400																				Recruitment delays have been experienced, however two of the three roles are now in post. It is expected the vacant role will be recruited to shortly.
MPG / ALL 001 / 19-20	Health, Adults and Community	Community Safety - Enforcement Review	7. People live in safer neighbourhoods and anti-social behaviour is tackled					-	121	86			121															The Head of Neighbourhood Operations started at the end of May 2019.
MPG/ HAC 01 / 18-19	Health, Adults and Community	Community Safety, ASB & Crime	7. People live in safer neighbourhoods and anti-social behaviour is tackled	273	273	277		550																				All the new posts are now employed against, and the cost of the new IT system was less than initially estimated.
MPG / ALL 002 / 19-20	Health, Adults and Community	Community Safety, Violence, Exploitation and Serious Organised Crime	7. People live in safer neighbourhoods and anti-social behaviour is tackled					-				113	113															
Health, Adult & Community Total				1,273	1,097	1,277		2,550	121	86	-	113	234	-	-	-	-	-	-	-	-	-	-	-	-	-		
MPG/ PLA 04 / 18-19	Place	Air Quality Assistant	5. People live in a borough that is clean and green	50	50	50		100																				The post has been filled and air quality work is ongoing. The postholder has now left LBTH and a recruitment process is underway to find a replacement. The post is potentially going to be filled by Agency staff which will negate any saving from the vacancy
MPG/ PLA 05 / 18-19	Place	Bursary for Environmental Health Trainees	5. People live in a borough that is clean and green	30	30	30		60																				The bursary has been used to fund posts for the past two years - all posts are currently filled and the funds will be spent in full
MPG / ALL 001 / 19-20	Place	Community Safety - Enforcement Review	7. People live in safer neighbourhoods and anti-social behaviour is tackled					-	451	451			451															Growth is offsetting an unachievable saving target
MGRO D&R 1-17	Place	Creating community hubs and regularising the usage of community buildings to provide high quality, low cost space for community groups	10. The Council works collaboratively across boundaries in strong and effective partnerships to achieve the best outcomes for residents					-						1,581	1,581													
MPG/ PLA 01 / 18-19	Place	Enabling Unemployed Parents to Move into Childcare Jobs	1. People access a range of education, training, and employment opportunities	451	503	451		902																				12 long term unemployed local residents have started on Childcare apprenticeships in a number of Early Years settings within Tower Hamlets. A further 12 are forecasted to start in February 2020.
MGRO D&R 2-17	Place	Enhancing services to support people in overcoming the barriers to accessing skills and toward employment	1. People access a range of education, training, and employment opportunities	226	463			226																				Underspend across MGF has been added into the projections across all programmes where needed. This particular programme shows a larger share as it now also includes three other key areas of Supported Employment focus for the Mayor: "Iginion" - work with the Tower project to support people with learning needs and other; "Inspire" - graduate support programme for Through Care young people; "Throughcare" Programme - working with young care leavers and NEETS to provide pre employment, well being, life skills and work experience. NO further MGF has been requested as yet for these programmes.
MGRO D&R 6-17	Place	Helping women to progress from unemployment into health care careers.	1. People access a range of education, training, and employment opportunities	705	625			705																				15 long term unemployed women have started on the Women in Health Programme as business administrators or health care assistants.
HRA Budget report	Place	HRA funding set aside for ASB Initiatives	7. People live in safer neighbourhoods and anti-social behaviour is tackled					-									736	736										Police officers are being funded through the HRA to prevent ASB on estates. LBTH receives match funding from MOPAC to provide additional police officers on a buy one get one free basis. It is projected that this funding will be spent in full during 2019/20
MGRO CLC 3-17	Place	Improving Air quality in Tower Hamlets	5. People live in a borough that is clean and green					-	26	26			26															A diesel surcharge for parking permits and pay by phone parking is to be introduced with the new back office system in October 2019. Funding will be spent in full during the year
MGRO CLC 4-17	Place	Incentivising better waste collection arrangements on housing estates	5. People live in a borough that is clean and green	250	250			250																				Links to 2 year plan for the estates recycling, communications and interventions projects.
MGRO D&R 3-17	Place	Introducing new off-street parking arrangements in our housing estates due to changes in national legislation	5. People live in a borough that is clean and green	(80)	(80)			(80)						1,478		1,450	326	3,254	(250)	(250)								14 estates have been approved for a statutory consultation to introduce Traffic Management Orders for enforcement of estates by NSL in partnership with Parking and Mobility Services. It is expected this will be carried out in October 2019. Capital budget relates to signage and will not be spent in full, spend likely to be minimal

Appendix 6: Current Capital Programme 2019-20 to 2028-29

Directorate	Programme	Current Year						Future Years		All Years (Inc Future and Past)			
		2019-20 Budget £m	2019-20 Spend (as at P5) £m	Spend to date as % of annual budget	2019-20 Forecast Spend £m	2019-20 Projected Variance (£m)	2019-20 % Forecast Vs Budget	Reasons For Variance	2020-21 Budget £m	Total Future Years Budget (£m)	Spend in Previous years for current projects (£m)	Total Budget - All Years (£m)	Total Projection All Years (£m)
Health, Adults & Community													
	Adult Social Care	0.190	0.000		0.190	0.000	100%		0.000	0.000	0.010	0.200	0.200
	Public Health	13.256	0.053	0%	5.820	-7.436	44%	There are a number of public consultations and planning designs under way, with some schemes expected to start towards the end of the year, early 20/21	5.579	6.496	4.466	29.797	22.360
	Tele Care/Telehealth Equipment	0.097	0.000	0%	0.097	0.000	100%		0.000	0.000	0.304	0.400	0.401
Health, Adults & Community Total		13.543	0.053		6.107	-7.436	45%		5.579	6.496	4.779	30.397	22.961
Children and Culture													
	Basic Need/Expansion	42.435	4.095	10%	19.114	-23.321	45%	London Dock School has recently been approved and works were profiled to start in 19-20, however the revised start date is anticipated for early 20-21.	54.675	40.560	73.465	211.135	187.814
	Conditions and Improvement	5.863	0.262	4%	4.661	-1.201	80%	A number of schemes have recently been approved and/or are in the process of being approved	0.345	0.000	19.660	25.867	24.666
	Culture	1.288	0.808	63%	0.951	-0.337	74%	A few schemes have been delayed and are expected to continue into next year	0.250	0.500	3.111	5.149	4.812
	Health and Wellbeing	0.768	-0.026		0.550	-0.218	72%	Programme being developed	0.540	0.780	0.126	2.214	1.996
	Healthy Pupil Capital Funding (HPCF)	0.048	0.029		0.048	0.000	101%		0.000	0.000	0.211	0.259	0.259
	Mayor's Priority - Parks and Open Spaces	0.027	0.000		0.027	0.000	99%		0.000	0.000		0.027	0.027
	Parks	6.052	1.257	21%	6.052	0.000	100%		2.050	5.050	4.519	17.672	17.671
	Provision for 2 year olds	1.994	0.409	20%	0.529	-1.465	27%	Programme under development	0.900	0.000	2.026	4.920	3.455
Children and Culture Total		58.474	6.834	12%	31.932	-26.542	55%		59.350	46.890	103.118	267.243	240.701
Place													
	Asset Maximisation	0.390	0.006	2%	0.116	-0.274	30%	New assets are being identified, and needs assessed	0.000	0.000	0.077	0.467	0.193
	BSF ICT Infrastructure	0.978	0.000	0%	0.000	-0.978	0%	The BSF scheme is completed. A proposal will be brought forward to utilise remaining resources, it is expected to be developed in 20/21	0.000	0.000	11.672	12.650	11.672
	Carbon Offsetting	1.336	0.011	1%	0.500	-0.836	37%	Programme under development	0.700	0.300	0.004	2.340	1.504
	CCTV	0.067	0.000	0%	0.067	0.000	99%		0.000	0.000	0.175	0.242	0.242
	Community Hubs/Buildings	1.495	1.126	75%	1.453	0.042	97%		0.000	0.000	2.191	3.686	3.644
	Contaminated Land Works	0.120	0.000	0%	0.100	-0.020	83%	Spend forecast is based on 5 sites being investigated but could be higher if more sites identified for investigation	0.024	0.000	0.370	0.514	0.494
	Conversion of council buildings to temporary accommodation	1.812	0.036	2%	0.429	-1.383	24%	Some delays due to the current arrangements for some of the buildings. Works due to be completed by December 21	0.000	0.000	0.438	2.250	0.867
	Creation of temporary accommodation	2.289	0.000		0.000	-2.289	0%	Scheme under review	0.000	0.000	0.023	2.312	0.023
	Disabled Facilities Grants	1.971	0.782	40%	1.971	0.000	100%		1.500	4.500	7.621	15.592	15.592
	Establish a Community Benefit Society	2.500	0.000	0%	0.000	-2.500	0%	The process of establishing a CBS in underway	0.000	0.000		2.500	0.000

Directorate	Programme	2019-20 Budget £m	2019-20 Spend (as at P5) £m	Spend to date as % of annual budget	2019-20 Forecast Spend £m	2019-20 Projected Variance (£m)	2019-20 % Forecast Vs Budget	Reasons For Variance	2020-21 Budget £m	Total Future Years Budget (£m)	Spend in Previous years for current projects (£m)	Total Budget - All Years (£m)	Total Projection All Years (£m)
	Establish a Wholly Owned Company	6.000	0.000	0%	0.000	-6.000	0%	The Process of establishing a company os well under way, and anticipate first acquisitions shortly	0.000	0.000		6.000	0.000
	ICT Solution - Handheld Devices	0.253	0.031	12%	0.253	0.000	100%		0.000	0.000	0.297	0.550	0.550
	Improving Air Quality	0.026	0.062	236%	0.062	0.036	237%		0.000	0.000	0.074	0.100	0.136
	Investment works to LBTH Assets	2.592	0.086	3%	0.125	-2.467	5%	Recently approved budget, schemes currently under review and development	2.042	1.542	1.473	7.649	5.182
	Mayor's Priority - Public Realm Improvements	2.401	-0.027	-1%	0.000	-2.401	0%		1.000	2.000		5.401	3.000
	Montefiore Centre Refurbishment Programme	1.950	0.006	0%	1.950	0.000	100%		0.000	0.000	0.063	2.013	2.013
	OPTEMS	0.145	0.000	0%	0.145	0.000	100%		0.000	0.000	0.895	1.040	1.040
	Private Sector Improvement Grants	0.015	0.027	175%	0.050	0.035	327%	Budget to be brought forward from future years	0.100	0.800	1.083	1.998	2.033
	Public Realm Improvements	26.562	1.948	7%	26.061	-0.501	98%		8.577	5.334	8.495	48.968	48.467
	Purchase of properties for use as Temporary Accommodation and purchase of s106 properties	24.970	41.902	168%	60.000	35.030	240%	Accelerated spend is being undertaken in order to limit the amount of interest payable on Right to Buy one for one receipts. Budget will be brought forward from future years	17.890	13.500	118.408	174.768	209.798
	Registered Provider Grant Scheme (from 1-4-1)	1.343	0.199	15%	1.343	0.000	100%		5.789	0.174	4.760	12.066	12.066
	Section 55 Programme - Transport and Improvements	0.440	0.000	0%	0.440	0.000	100%		0.000	0.000		0.440	0.440
	S106 Schemes	3.811	0.129	3%	1.429	-2.382	38%	Current profile of schemes is under review.	1.815	1.453	1.843	8.923	6.541
	Section 106 Passported Funding	0.026	0.026	100%	0.026	0.000	100%		0.000	0.000	7.120	7.146	7.146
	St Georges Town Hall Refurbishment Programme	1.988	0.019	1%	1.988	0.000	100%		0.000	0.000	0.044	2.032	2.032
	CIL Schemes - South Dock Bridge	1.480	0.065	4%	1.250	-0.230	84%	Capital Programme Delivery (South Dock Bridge) PID is going to Cabinet in October 2019 for approval of £15m for the life of the project. The 2019-2020 budget forecast is £1.250. A additional £2.5m will also be need to be secured due to increased design costs (change will be made to PID).	6.760	6.760		15.000	14.770
	TfL Schemes	4.979	0.311	6%	4.513	-0.466	91%		1.015	0.000	18.880	24.874	24.408
	Local Infrastructure Initiatives (LIF)	1.900	0.000	0%	1.900	0.000	100%		4.500	3.700		10.100	10.100
	Thriving High Streets Pilot Programme	0.453	0.046	10%	0.453	0.000	100%		0.000	0.000	0.549	1.001	1.002
	Transport S106 Funded Schemes	3.122	0.325	10%	1.211	-1.911	39%	Current programme of works is under review	0.101	0.522	3.931	7.677	5.766
	WorkPath / Young WorkPath	0.016	0.000	0%	0.016	0.000	99%		0.000	0.000	0.184	0.200	0.200
Place Total		97.432	47.116	48%	107.851	10.504	111%		56.314	44.285	190.669	380.499	390.919
Resources													
	Idea Store	0.268	0.000	0%	0.000	-0.268	0%	Programme under development	0.000	0.000	3.940	4.208	3.940
	ICT Transformation	4.200	0.000	0%	0.000	-4.200	0%	Programme under development	0.000	0.000		4.200	0.000
	Improved Local Presence - Local History Library and Archives	0.025	0.000	0%	0.025	0.000	100%		0.000	0.000		0.025	0.025
	Local Presence Project	1.479	0.589	40%	1.092	-0.387	74%	Works underway with some slippage expected into 20-21	0.000	0.000	0.121	1.600	1.213
	RESOURCES - Mayoral Priority Growth 2017-18 to 2019-20	0.500	0.000	0%	0.000	-0.500	0%		0.500	0.500		1.500	1.000
Resources Total		6.472	0.589	9%	1.117	-5.355	17%		0.500	0.500	4.061	11.533	6.178

Directorate	Programme	2019-20 Budget £m	2019-20 Spend (as at P5) £m	Spend to date as % of annual budget	2019-20 Forecast Spend £m	2019-20 Projected Variance (£m)	2019-20 % Forecast Vs Budget	Reasons For Variance	2020-21 Budget £m	Total Future Years Budget (£m)	Spend in Previous years for current projects (£m)	Total Budget - All Years (£m)	Total Projection All Years (£m)
Corporate													
	CORP - Indicative Schemes - Other	1.450	0.000	0%	0.000	-1.450	0%		0.000	0.000		1.450	1.450
	Whitechapel Civic Centre	39.842	10.087	25%	39.842	0.000	100%		42.719	26.521	26.303	135.385	135.385
Corporate Total		41.292	10.087	24%	39.842	-1.450	96%		42.719	26.521	26.303	136.835	136.835
Housing Revenue Account													
	Blackwall Reach	1.062	0.040	4%	1.062	0.000	100%		1.263	0.045	12.027	14.398	14.398
	Community Benefit Society - 1-4-1 receipts	4.500	0.000	0%	0.000	-4.500	0%	A company, Mulberry Housing Ltd has been set up. Potential properties have been identified and purchase is being progressed	4.500	0.000		9.000	4.500
	Fuel Poverty Works	0.412	0.000	0%	0.000	-0.412	0%		0.000	0.000	3.898	4.309	3.898
	Housing Capital Programme	32.190	3.157	10%	19.000	-13.190	59%	The housing capital programme currently has a possible 252 schemes that it can complete in the 2019/20 programme. The £19mill above is from 133 schemes that are fully approved. This leaves 119 schemes in the Housing capital programme, and also all of the schemes in fuel poverty works, that are 'at risk' of not being approved/completed in 2019/20. The reason for 'at risk' is that there may be a delay in getting contracts approved.	24.788	49.858	206.324	313.160	299.970
	Mayor's Priority - Housing	1.478	0.039	3%	0.000	-1.478	0%	Programme under development	1.450	0.326		3.254	1.776
	New Supply - On site	18.036	9.309	52%	17.356	-0.680	96%		12.000	1.500	38.241	69.776	69.097
	New Supply Pre construction (Phase 1)	11.225	1.103	10%	3.908	-7.317	35%	Various programme of works have started and in various stages of planning and design. Any unspent budgets will be spent in future years	14.453	31.400	4.776	61.854	54.537
	Ocean Estate Regeneration	0.849	-0.113	-13%	0.620	-0.229	73%	Ongoing tribunals.	0.000	0.000	27.279	28.128	27.899
	Phase 2a Infill Pipeline Schemes (1-4-1)	27.712	0.291	1%	2.554	-25.158	9%	Various programme of works have started and in various stages of planning and design. Any unspent budgets will be spent in future years	25.650	21.227	1.509	76.098	50.940
	Phase 2b Mixed Tenure Schemes (1-4-1)	16.029	0.208	1%	0.000	-16.029	0%	Various programme of works have started and in various stages of planning and design. Any unspent budgets will be spent in future years	21.800	25.188	4.841	67.858	51.829
Housing Revenue Account Total		113.491	14.035	12%	44.500	-68.991	39%		105.904	129.545	298.895	647.835	578.844
Total Capital Programme 2018-19 to 2028-29		324.675	78.714	24%	231.350	-93.325	71%		270.365	254.237	627.826	1474.342	1376.438

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Appendix 7: Capital change requests for approval 2019-20 Q2

Scheme	Programme	Change Summary	Strategic Priority Outcome	Directorate	Client Lead	Budget Profile in Bid / PID / Exception report						Extra requirement above amounts already in capital programme				Total Extra Budget Request £m
						Previous years Actual £m	2019-20 Budget* £m	2020-21 Budget £m	2021-22 Budget £m	2022-23 Budget £m	Total Budget £m	2019-20 Budget £m	2020-21 Budget £m	2021-22 Budget £m	2022-23 Budget £m	
Conversion of council buildings to temporary accommodation	Conversion of council buildings to temporary accommodation	This scheme exception requests an additional £2.95m needed to meet the shortfall required to deliver the original 50 units and 30 additional units identified in the Temporary Accommodation New Homes Conversions report 29/1/2019. Cabinet on 10th January 2017 agreed £2.25m to convert up to 50 dwellings of temporary accommodation. 50 new temporary dwellings have been identified, of which 4 have already been completed and 6 are onsite/under construction. The remainder are in the feasibility stage or awaiting planning consent.	6. People live in good quality and affordable homes and neighbourhoods	Place	James Walsh	0.450	2.700	2.050	-	-	5.200	0.900	2.050	-	-	2.950
Beatrice Tate Special School - Temporary Accommodation	Conditions and improvement	This scheme exception records additional funds required to accommodate additional pupils that will be attending the special school academic year 2019-20 until permanent accommodation, currently being developed, is in place circa September 2021. To note the increase in the estimated cost of providing temporary accommodation at an additional cost of £1.102m.	1. People access a range of education, training, and employment opportunities	Children and Culture	Calvin Coughlan	0.102	1.200	0.300	-	-	1.602	0.802	0.300	-	-	1.102
Barley Street	New Supply Pre construction (Phase 1)	This scheme exception records that following extensive market testing and a 9 week tender period, only one submission was received from Mulalley. The proposed contract sum for the scheme is £18,826,413.00 which is over the PTE of £16,752,300.00. This project is to provide 53 social housing units on the Collingwood Estate. The units comprise of 1, 2 3, 4 and 5 bed apartments across three 4/5 story blocks. Enabling works prior to the construction of these units include the diversion of the district heating network, a revised fire brigade access strategy, statutory diversions and the development of a new community centre.	6. People live in good quality and affordable homes and neighbourhoods	Place	Chac Cun	0.817	4.183	12.500	4.500	0.350	22.350	0.390	8.070	0.100	(3.650)	4.910
						1.369	8.083	14.850	4.500	0.350	29.152	2.092	10.420	0.100	(3.650)	8.962

*Budget adjusted to reflect any slippage from previous year

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