

Cabinet



Wednesday, 20 September 2023 at 5.30 p.m.

Council Chamber - Town Hall, Whitechapel

Agenda

Mayor Lutfur Rahman

Cabinet Members

Councillor Maium Talukdar	(Deputy Mayor and Cabinet Member for Education, Youth and Lifelong Learning (Statutory Deputy Mayor))
Councillor Kabir Ahmed	(Cabinet Member for Regeneration, Inclusive Development and Housebuilding)
Councillor Saied Ahmed	(Cabinet Member for Resources and the Cost of Living)
Councillor Suluk Ahmed	(Cabinet Member for Equalities and Social Inclusion)
Councillor Gulam Kibria Choudhury	(Cabinet Member for Health, Wellbeing and Social Care)
Councillor Abu Chowdhury	(Cabinet Member for Safer Communities)
Councillor Iqbal Hossain	(Cabinet Member for Culture and Recreation)
Councillor Kabir Hussain	(Cabinet Member for Environment and the Climate Emergency)
Councillor Abdul Wahid	(Cabinet Member for Jobs, Skills and Growth)

[The quorum for Cabinet is 3 Members]

Further Information

Reports for consideration, meeting contact details, public participation and more information on Cabinet decision-making is available on the following pages.



Public Information

Viewing or Participating in Cabinet Meetings

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. Except where any exempt/restricted documents are being discussed, the public are welcome to view this meeting through the Council's webcast system.

Physical Attendance at the Town Hall is also welcome, however, seating is limited and offered on a first come, first served basis. **Please note** that you may be filmed in the background as part of the Council's filming of the meeting.

Meeting Webcast

The meeting is being webcast for viewing through the Council's webcast system.

<http://towerhamlets.public-i.tv/core/portal/home>

Contact for further enquiries:

Joel West, Democratic Services,
Town Hall, 160 Whitechapel Road, London, E1 1BJ
Tel: 020 7364 4207
E-mail: joel.west@towerhamlets.gov.uk
Web: <http://www.towerhamlets.gov.uk>

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A Guide to CABINET

Decision Making at Tower Hamlets

As Tower Hamlets operates the Directly Elected Mayor system, **Mayor Lutfur Rahman** 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, above £1million; 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, 22 September 2023**
- The deadline for call-ins is: **Friday, 29 September 2023**

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 previous page) by 5 pm the day before the meeting.

Cabinet

Wednesday, 20 September 2023

5.30 p.m.

Pages

PUBLIC QUESTION AND ANSWER SESSION

There will be an opportunity (up to 15 minutes) for members of the public to put questions to the Mayor and Cabinet Members before the Cabinet commences its consideration of the substantive business set out in the agenda.

1. APOLOGIES FOR ABSENCE

To receive any apologies for absence.

2. DECLARATIONS OF DISCLOSABLE PECUNIARY INTERESTS AND OTHER INTERESTS

9 - 10

Members are reminded to consider the categories of interest, identified in the Code of Conduct for Members to determine; whether they have an interest in any agenda item and any action they should take. For further details, see the attached note from the Monitoring Officer.

Members are also reminded to declare the nature of the interest at the earliest opportunity and the agenda item it relates to. Please note that ultimately it is the Members' responsibility to identify any interests and also update their register of interests form as required by the Code.

If in doubt as to the nature of an interest, you are advised to seek advice prior to the meeting by contacting the Monitoring Officer or Democratic Services.

3. UNRESTRICTED MINUTES

11 - 20

The unrestricted minutes of the Cabinet meeting held on 26 July 2023 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 Section 30, Rule 59 of the Constitution).

6. UNRESTRICTED REPORTS FOR CONSIDERATION

6 .1	Q1 Performance Report: Year 2 of the Annual Delivery Plan of the Strategic Plan 2022-2024	21 - 78
Report Summary: This report presents the Council's Q1 performance		
Wards: All		
Lead Member: Mayor		
Corporate Priority: All		
6 .2	Budget Monitoring 23/24 Q1	To Follow
Report Summary: : This report presents the Council's Q1 budgetary performance		
Wards:		
Lead Member: Cabinet Member for Resources		
Corporate Priority: All		
6 .3	Housing Development Capital Programme Additions	79 - 92
Report Summary: Information on the latest schemes for inclusion for direct delivery as part of the Housing Development Capital Programme.		
Wards: All Wards		
Lead Member: Cabinet Member for Regeneration, Inclusive Development and Housebuilding		
Corporate Priority: Homes for the future		
6 .4	Liveable Streets Bethnal Green consultation outcome and measures	93 - 298
Report Summary: Review of proposed removal of traffic management schemes implemented under the Liveable Streets programme.		
Wards: Bethnal Green West; Spitalfields & Banglatown; St Katharine's & Wapping; Weavers		
Lead Member: Cabinet Member for Environment and the Climate Emergency		
Corporate Priority: A clean and green future		

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6 .5	Liveable Streets Brick Lane consultation outcome and measures	299 - 374
<p>Report Summary: Review of proposed removal of traffic management schemes implemented under the Liveable Streets programme.</p>		
<p>Wards: Bethnal Green West; Spitalfields & Banglatown; St Katharine's & Wapping; Weavers</p>		
<p>Lead Member: Cabinet Member for Environment and the Climate Emergency</p>		
<p>Corporate Priority: A clean and green future</p>		

6 .6	Tower Hamlets Reduction and Recycling Plan 2023 - 2025	375 - 420
<p>Report Summary: A Reduction and Recycling Plan (RRP) has been developed and produced. RRP's are a requirement set by the Greater London Authority to ensure all London authorities are in general conformity with the London Environment Strategy.</p> <p>The current RRP covers the period April 2023 to the end of March 2025 and comprises environmental metrics drawn from the previous RRP reporting cycle (2018-2022), along with a cross-cutting action plan drawn from our strategies including the Strategic Plan and Waste Strategy.</p>		
<p>Wards: All Wards</p>		
<p>Lead Member: Cabinet Member for Environment and the Climate Emergency</p>		
<p>Corporate Priority: A clean and green future</p>		

6 .7	Tower Hamlets Customer Experience Strategy	421 - 660
<p>Report Summary: This report seeks comments and approval of the Tower Hamlets Customer Experience Strategy 2023 -2026. The strategy was launched for public consultation, on the 5th of June and internal staff engagement on the 21st of June ending on the 7th of July. The strategy sets out our vision to deliver against the commitments outlined in the and will connect the council with our customers and facilitate their easy access to our services to help them have a better future.</p>		
<p>Wards: All Wards</p>		
<p>Lead Member: Cabinet Member for Regeneration, Inclusive Development and Housebuilding</p>		
<p>Corporate Priority: A council that works for you and listens to you</p>		

6 .8	Review of Statement of Licensing Policy 2023	661 - 872
<p>Report Summary: Statutory five year review of the Statement of Licensing Policy.</p>		
<p>Wards: All Wards</p>		



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Lead Member:	Cabinet Member for Environment and the Climate Emergency
Corporate Priority:	A council that works for you and listens to you

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 Section 30, Rule 59 of the Constitution).

11. EXEMPT / CONFIDENTIAL REPORTS FOR CONSIDERATION



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

Next Meeting of Cabinet:

Wednesday, 25 October 2023 at 5.30 p.m. in Council Chamber - Town Hall,
Whitechapel



The best of London in one borough

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Agenda Item 2

DECLARATIONS OF INTERESTS AT MEETINGS– NOTE FROM THE MONITORING OFFICER

This note is for guidance only. For further details please consult the Code of Conduct for Members at Part C, Section 31 of the Council's Constitution

(i) Disclosable Pecuniary Interests (DPI)

You have a DPI in any item of business on the agenda where it relates to the categories listed in **Appendix A** to this guidance. Please note that a DPI includes: (i) Your own relevant interests; (ii) Those of your spouse or civil partner; (iii) A person with whom the Member is living as husband/wife/civil partners. Other individuals, e.g. Children, siblings and flatmates do not need to be considered. Failure to disclose or register a DPI (within 28 days) is a criminal offence.

Members with a DPI, (unless granted a dispensation) must not seek to improperly influence the decision, must declare the nature of the interest and leave the meeting room (including the public gallery) during the consideration and decision on the item – unless exercising their right to address the Committee.

DPI Dispensations and Sensitive Interests. In certain circumstances, Members may make a request to the Monitoring Officer for a dispensation or for an interest to be treated as sensitive.

(ii) Non - DPI Interests that the Council has decided should be registered – (Non - DPIs)

You will have 'Non DPI Interest' in any item on the agenda, where it relates to (i) the offer of gifts or hospitality, (with an estimated value of at least £25) (ii) Council Appointments or nominations to bodies (iii) Membership of any body exercising a function of a public nature, a charitable purpose or aimed at influencing public opinion.

Members must declare the nature of the interest, but may stay in the meeting room and participate in the consideration of the matter and vote on it **unless:**

- A reasonable person would think that your interest is so significant that it would be likely to impair your judgement of the public interest. **If so, you must withdraw and take no part in the consideration or discussion of the matter.**

(iii) Declarations of Interests not included in the Register of Members' Interest.

Occasions may arise where a matter under consideration would, or would be likely to, **affect the wellbeing of you, your family, or close associate(s) more than it would anyone else living in the local area** but which is not required to be included in the Register of Members' Interests. In such matters, Members must consider the information set out in paragraph (ii) above regarding Non DPI - interests and apply the test, set out in this paragraph.

Guidance on Predetermination and Bias

Member's attention is drawn to the guidance on predetermination and bias, particularly the need to consider the merits of the case with an open mind, as set out in the Planning and Licensing Codes of Conduct, (Part C, Section 34 and 35 of the Constitution). For further advice on the possibility of bias or predetermination, you are advised to seek advice prior to the meeting.

Section 106 of the Local Government Finance Act, 1992 - Declarations which restrict Members in Council Tax arrears, for at least a two months from voting

In such circumstances the member may not vote on any reports and motions with respect to the matter.

Further Advice contact: Janet Fasan, Director of Legal and Interim Monitoring Officer, Tel: 020 7364 4348.

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	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. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.
Contracts	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— (a) under which goods or services are to be provided or works are to be executed; and (b) which has not been fully discharged.
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	Any tenancy where (to the Member's knowledge)— (a) the landlord is the relevant authority; and (b) the tenant is a body in which the relevant person has a beneficial interest.
Securities	Any beneficial interest in securities of a body where— (a) that body (to the Member's knowledge) has a place of business or land in the area of the relevant authority; and (b) either— (i) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or (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.

LONDON BOROUGH OF TOWER HAMLETS

MINUTES OF THE CABINET

HELD AT 5.50 P.M. ON WEDNESDAY, 26 JULY 2023

COUNCIL CHAMBER - TOWN HALL, WHITECHAPEL

Members Present in Person:

Mayor Lutfur Rahman	
Councillor Maium Talukdar	(Deputy Mayor and Cabinet Member for Education, Youth and Lifelong Learning (Statutory Deputy Mayor))
Councillor Kabir Ahmed	(Cabinet Member for Regeneration, Inclusive Development and Housebuilding)
Councillor Suluk Ahmed	(Cabinet Member for Equalities and Social Inclusion)
Councillor Gulam Kibria Choudhury	(Cabinet Member for Health, Wellbeing and Social Care)
Councillor Abu Chowdhury	(Cabinet Member for Safer Communities)
Councillor Iqbal Hossain	(Cabinet Member for Culture and Recreation)
Councillor Kabir Hussain	(Cabinet Member for Environment and the Climate Emergency)
Councillor Abdul Wahid	(Cabinet Member for Jobs, Skills and Growth)

Members In Attendance Virtually:

Councillor Saied Ahmed	(Cabinet Member for Resources and the Cost of Living)
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Officers Present in Person:

Stephen Halsey	(Chief Executive)
Denise Radley	(Corporate Director, Health and Social Care)
James Thomas	(Corporate Director, Children's Services)
Janet Fasan	(Director of Legal & Monitoring Officer)
Onyekachi Ajisafe	(Strategy & Policy Officer, Strategy, Policy & Performance)
Susannah Beasley-Murray	(Divisional Director of Supporting Families)
Stephen Bramah	(Corporate Head of Strategy and Improvement)
Terry Bryan	(Service Head (Pupil Access and School Sufficiency))
Lisa Fraser	(Director of Education)
Joseph Leach	(Business Intelligence and Performance Lead)
Simon Baxter	(Interim Director Public Realm)
Joel West	(Democratic Services Team Leader (Committee))

Officers In Attendance Virtually:

Caroline Holland	(Interim Corporate Director, Resources)
Jignesh Parmar	(Head of Procurement)

Jenny Pittam

Interim Head Contract Services

1. APOLOGIES FOR ABSENCE

None.

2. DECLARATIONS OF DISCLOSABLE PECUNIARY INTERESTS AND OTHER 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 21 June be approved and signed by the Mayor as a correct record of proceedings.

4. ANNOUNCEMENTS (IF ANY) FROM THE MAYOR

Stephen Halsey, Chief Executive, announced that there was an ongoing investigation by an independent investigator into concerns of Council homelessness staff that had been aired in a national newspaper article. Those staff had told the Chief Executive they were satisfied with the approach the Council was taking and would await the outcome of the investigation. Therefore the council would not be making any further comment prior to the outcome of the investigation. The Council's position was that the well-being of staff was an issue of significant importance both to the Chief Executive and the Mayor and they would be taking appropriate steps to ensure that staff impacted by the article were supported. Stephen also noted he felt the article was inappropriate, as it did not take into account the wider context of housing demand and had resulted in staff feeling undermined and stressed.

The Mayor noted the launch of Young Tower Hamlets recently at the Haileybury Youth Centre. He stressed the importance of promoting youth provision and to his administration and noted the significant additional investment previously agreed for youth services.

5. OVERVIEW & SCRUTINY COMMITTEE**5.1 Chair's Advice of Key Issues or Questions**

Councillor Musthak Ahmed, Chair Overview and Scrutiny Committee addressed the meeting on behalf of the Committee. He provided the Mayor and Cabinet with an overview of the Committee's recent work including:

The call-in on the Cabinet Report on Neighbourhood Community Infrastructure Levy (NCIL). Councillor Ahmed extended his thanks to Councillor Kabir Ahmed, for his attendance and response to the call-in. The

committee deliberated on the evidence presented and subsequently voted on re-affirming the decision of the Mayor on Cabinet.

The committee had received and considered Cabinet reports for the Strategic Performance & Delivery Annual Report 2022/23 and the Outturn Budget Report 2022/23 (including Capital). One pre-decision question was agreed and submitted on Land Option – Neptune Wharf School Development Site.

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

The Mayor and Cabinet noted that the decision on Neighbourhood Community Infrastructure Levy (NCIL) taken at the June 2023 Cabinet meeting had been called in, and re-affirmed by the Overview and Scrutiny Committee.

6. UNRESTRICTED REPORTS FOR CONSIDERATION

6.1 Annual Strategic Delivery and Performance Reporting –2022/23

Stephen Bramah, Head of Corporate Strategy & Improvement introduced the report that provided an annual update on the delivery and implementation of the council's Strategic Plan throughout 2022/23.

The Mayor welcomed the report and noted high performance in several key areas, though expressed concern at the number of red-rated performance measures, particularly those directly related to tackling overcrowding and recycling. He emphasised his commitment to deliver 4,000 homes. He announced that he would ask officers to prepare improvement plans for underperforming measures.

At the invitation of the Mayor, Simon Baxter, Interim Director of Public Realm provided a verbal explanation for underperformance in recycling and the key measures to remedy it. Simon explained he was confident of seeing a material improvement in the next 12 months.

At the invitation of the Mayor, Paul Buckenham, Head of Development Management provided a verbal explanation for underperformance in housing delivery, including wider national and external challenges and the key measures the Council would take in response.

Stephen Halsey, Chief Executive, explained how the Council would review its role and relationship with central government including stronger and more effective lobbying for support to address the homelessness crisis.

RESOLVED that the Mayor in Cabinet:

1. Notes the strategic delivery and performance report for 2022/23;
2. Notes the performance of the strategic measures, including those measures where the minimum expectation has been missed; and

3. Notes progress in delivering the council's Strategic Plan.

6.2 Tower Hamlets Council Strategic Plan : 2023/24 Annual Delivery Plan

Stephen Bramah, Head of Corporate Strategy & Improvement introduced the report that set out how the council would progress the delivery of the Strategic Plan's priorities in the second year of the administration. Stephen advised of a minor change to the proposed delivery plan: that the 2023/24 target for substance misuse continuity of care from prison to community, be increased slightly from 45% to 50% as the outturn for 2022/23 had only recently become available.

The Mayor welcomed the report and approved the revision to the target as above.

RESOLVED that the Mayor in Cabinet:

1. Approves the Tower Hamlets Council Annual Delivery Plan for 2023/24 (Appendix 1 and 2 to the report) subject to measure 6.02 Adults with substance misuse treatment need who successfully engage in community based structured treatment following release from prison being increased to 50%.
2. Notes the specific equalities considerations as set out in paragraph 4 below.
3. Delegates authority to the Director Strategy, Improvement and Transformation to finalise any targets for performance measures which remain provisional (Appendix 2 to the report), following consultation with the Mayor.

6.3 Budget monitoring report 2022-23 Outturn (inc Capital)

Councillor Saied Ahmed, Cabinet Member for Resources and the Cost of Living introduced the report that presented the provisional outturn compared to the budget report 2022-23 as at 31 March 2023 for the General Fund, Dedicated Schools Grant (DSG) Budget, Housing Revenue Account (HRA), progress made against savings targets and the council's capital programme. The report also provides projections on General Fund earmarked reserves and the forecast impacts of Covid on the councils finances in 2022-23.

Caroline Holland, Corporate Director Resources, asked the Mayor and Cabinet to note the Council faced substantial financial challenges over the next few years to deliver a balanced budget. It would also be necessary to address the significant overspends to the HRA outturn to ensure it remained stable and could deliver the Mayor's ambitious house building commitment.

The Mayor welcomed the report. He explained that some overspends were unavoidable, but the Council continues to monitor these pressures as closely as possible.

RESOLVED that the Mayor in Cabinet:

1. Notes the council's Provisional outturn position against General Fund, Dedicated Schools Budget, Housing Revenue Account and earmarked reserves for 2022-23, based on provisional outturn as at 31st March 2023;
2. Notes the progress made against the 2022-23 savings targets, based on provisional outturn as at 31st March 2023;
3. Notes the council's provisional outturn as at 31st March 2023 against General Fund and Housing Revenue Account capital programme approved budgets for 2022-23, underspends to be released back into the general programme, the slippage into future years and the revised capital budgets for 2023-26; and
4. Notes that there are no equalities implications directly resulting from this report, as set out in Section 4 of the report.

6.4 Contracts Forward Plan 2023/24 - Quarter 1

Councillor Saied Ahmed, Cabinet Member for Resources and the Cost of Living introduced the report that set out a forward plan of supply and service contracts over £1m in value, or capital works contracts over £5m.

The Mayor welcomed the report, although expressed concern with the detail of the proposed contract 'St George's Leisure Centre Rebuild – Award of Main Contractor as he felt the delivery time was too long and should allow an open tender as opposed to a framework route. He indicated he did not approve authorisation for this contract to progress in its current form.

RESOLVED that the Mayor in Cabinet:

1. Notes the contract summary at Appendix 1 to the report
2. Authorises the appropriate Corporate Director in consultation with the Mayor to award contracts set out in Appendix 1 following an appropriate procurement exercise, except for the contract with ref/title 'St George's Leisure Centre Rebuild – Award of Main Contractor';
3. Requests that the contract with ref/title 'St George's Leisure Centre Rebuild – Award of Main Contractor' is the subject of a separate report to Cabinet at the earliest opportunity;
4. Authorises the Director Legal Services (Monitoring Officer), to execute all necessary contract documents in respect of the awards of contract referred to at resolution 2.
5. Notes the procurement forward plan 2023-2028 schedule detailed in Appendix 2 to the report.

6.5 Tower Hamlets Safeguarding Children Partnership Annual Report 2022/23

Councillor Maium Talukdar, Deputy Mayor and Cabinet Member for Education and Lifelong Learning introduced the report that presented the Tower Hamlets Safeguarding Children Partnership (THSCP) annual report on the effectiveness of safeguarding and promoting the welfare of children in its locality for 2022-23.

James Thomas, Corporate Director Children and Culture provided further detail including highlighting the main challenges faced by the partnership in the last year. James stressed it was more important than ever for the Council to work with its partners to keep children safe.

At the invitation of the Mayor the other partner leads: Korkor Ceasar, Integrated Care Board and James Conway, Metropolitan Police, addressed the Cabinet. Korkor provided information on statutory reviews, their context and rationale. She explained how the partnership had learned and developed over the year. James summarised the next steps for the partnership including setting priorities and how it could learn from past experiences. He stressed that the partnership placed the voice of child at heart of its work.

The Mayor welcomed the report and thanked officers and partners for their hard work to deliver the report and their role in promoting the safety of children in the borough.

RESOLVED that the Mayor in Cabinet:

1. Notes the work that has been carried out by the Tower Hamlets Safeguarding Children's Partnership over the year 2022-23 and the outcomes that members would like to see from the THSCP over the next year; and
2. Notes the specific equalities considerations as set out in paragraph 4.1 of the report.

6.6 SEND Improvement Annual Report 2022

Councillor Maium Talukdar, Deputy Mayor and Cabinet Member for Education and Lifelong Learning, introduced the report that provided an overview of the progress and impact of SEND improvement work during 2022/23 and explained how NHS Northeast London and the Council worked together with other partners across the local area to deliver on priorities set out in the SEND Strategy and SEND Improvement Plan.

James Thomas, Corporate Director Children and Culture, provided further detail. James explained that whilst SEND support continues to be an area of significant pressure on the Council, new investment and a strong focus on

partnership working had contributed to driving improvements in the past few years.

Further to questions from the Mayor and Cabinet, James provided more detail on the support available for SEND post-16. James explained that support is provided up to 25 and the Council has expanded provision for that older age group. Lisa Fraser, Director of Education, provided details of new apprenticeship programmes launched January 2023, some of which are specifically for SEND residents.

RESOLVED that the Mayor in Cabinet:

1. Notes the contents of the SEND Improvement Board Annual Report 2022/23.

6.7 Corporate Parenting Strategy 2023 - 2028

Councillor Maium Talukdar, Deputy Mayor and Cabinet Member for Education, Youth and Lifelong Learning, introduced the report that outlined a vision for the future with a set of priorities; providing a roadmap of how the Council would work with young people over the strategy's five-year lifecycle to ensure they have every opportunity to develop, realise their aspirations and thrive.

James Thomas, Corporate Director Children and Culture and Susannah Beasley Murray, Head of Supporting Families, added further detail. Susannah stressed the strategy was ambitious and was co-produced with stakeholders including young people and parents etc coproduction. All priorities had clear work streams. James highlighted the important work of the Council's virtual school in promoting better attainment and outcomes for those in care.

The Mayor welcomed the report and draft strategy. The Cabinet welcomed the proposed strategy and noted the Mayor's commitment to expanding post-16 support for young people.

RESOLVED that the Mayor in Cabinet:

1. Approves the final version of the Corporate Parenting Strategy following its progression through the council's decision-making process.

6.8 Corporate Parenting Commitments

Councillor Maium Talukdar, Deputy Mayor and Cabinet Member for Education and Lifelong Learning, introduced the report that proposed the Council introduce care experience as a protected characteristic, recognising the disparity and disproportionality faces by those with care experience when it comes to health, education, housing, employment, and criminal justice amongst others.

At the invitation of the Mayor, three care leavers addressed the Cabinet to talk about the experiences and challenges they faced due to being within the care system. Each reported how they had overcome those challenges to realise significant success in their professional and personal lives, but recognised the same was not always true for all care leavers, for whom statistics showed poorer outcomes compared to those without care experience. They welcomed the proposal to introduce care experience as a protected characteristic as they felt it would greatly help future care leavers to realise their goals and aspirations.

The Mayor and Cabinet thanked the young persons for their moving and inspiring testimony. All Cabinet members expressed a desire to celebrate their achievements so all could learn from their experiences.

RESOLVED that the Mayor in Cabinet:

1. Recognises that care experienced people are a group likely to face discrimination.
2. Agrees to treat care experience as if it were a Protected Characteristic, conducting Equality Impact Assessments for future services and policies.
3. Proactively seeks out and listens to the voices of care experienced people when developing new policies.
4. Includes care experience in the publication and review of Equality Objectives and annual information relating to Protected Characteristics.
5. Calls upon all other local organisations and partners to treat care experience as a Protected Characteristic and adopt corporate parenting principles.
6. Identifies and review barriers impacting care experienced people in recruitment, offering guaranteed interviews for eligible applicants.
7. Encourages statutory partners and small businesses to adopt similar employment practices.
8. Establishes a cross-council approach to creating opportunities for care experienced individuals, including training for recruiting managers and support into apprenticeships.
9. Reports progress and achievements in the annual Corporate Parenting Board report and lobby central government for care experience to be a protected characteristic.
10. Notes the Equalities Impact Assessment / specific equalities considerations as set out from Paragraph 4.1 of the report.
11. Notes this report at the next Full Council meeting.

6.9 Land option – Neptune Wharf

Councillor Maium Talukdar, Deputy Mayor and Cabinet Member for Education, Youth and Lifelong Learning introduced the report that recommended that the Council not take up the option to develop the Neptune Wharf school site for a new primary school.

RESOLVED that the Mayor in Cabinet:

1. Agrees that the Neptune Wharf site allocation is not taken forward for the development of a new three form entry primary school.

7. ANY OTHER UNRESTRICTED BUSINESS CONSIDERED TO BE URGENT

None.

8. EXCLUSION OF THE PRESS AND PUBLIC

A motion to exclude press and public was not required.

9. EXEMPT / CONFIDENTIAL MINUTES

None.

10. OVERVIEW & SCRUTINY COMMITTEE**10.1 Chair's Advice of Key Issues or Questions in Relation to Exempt / Confidential Business**

None.

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

None.

11. EXEMPT / CONFIDENTIAL REPORTS FOR CONSIDERATION

None.

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

None.

The meeting ended at 7.25 p.m.

Chair, Mayor Lutfur Rahman
Cabinet

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Cabinet 20 September 2023	 TOWER HAMLETS
Report of: Robin Beattie, Interim Director of Strategy. Improvement and Transformation	Classification: Unrestricted
Q1 Performance Report: Year 2 of the Annual Delivery Plan of the Strategic Plan 2022-2024	

Lead Member	Lutfur Rahman – Mayor of Tower Hamlets
Originating Officer(s)	Stephen Bramah, Corporate Head of Strategy and Improvement
Wards affected	All
Key Decision?	No
Reason for Key Decision	This report has been reviewed as not meeting the Key Decision criteria.
Forward Plan Notice Published	No
Strategic Plan Priority / Outcome	All 8 Strategic Priorities: Priority One: Tackling the Cost of Living Priority Two: Homes for the Future Priority Three: Accelerate Education Priority Four: Boost culture, business, jobs and leisure Priority Five: Invest in Public Services Priority Six: Empower Communities and Fight Crime Priority Seven: A Clean and Green Future Priority Eight: A Council that listens and works for everyone

Executive Summary

This report provides the Mayor in Cabinet with a Quarter 1 monitoring update of Year 2 Annual Delivery Plan 2023-24 performance measures.

The delivery status of operations relevant to the council’s strategic objectives is reported within the intention to give a clear understanding of the council’s current performance.

This data is provided to inform any necessary decisions or actions arising from current operational delivery.

Recommendations:

The Mayor in Cabinet is recommended to:

1. Note the strategic delivery and performance report for Q1 covering the period of 1st April 2023 to 30th June 2023 (This cover report).
2. Review the status of 51 performance measures in Q1 tracking the delivery of Year 2 of the Strategic Plan 2022-2024 (See Appendix A).

1 REASONS FOR THE DECISIONS

- 1.1 The council's reporting cycle – the *draft Performance Management & Accountability Framework 2023-24* is set up to provide quarterly update reports for the delivery of the Strategic Plan 2022-2024 including operational performance measures.
- 1.2 Targeted performance measurement is relevant to strategic policy as it helps services to be designed so that they can deliver strategic objectives.
- 1.3 By examining performance measures of operational activity, the council can make informed decisions about how to effectively steer resources towards the goals of the organisation.

2 ALTERNATIVE OPTIONS

- 2.1 The Cabinet may decide not to review the performance information. This is not recommended as Members have a key role to review and challenge under-performance and utilise performance information to inform resource allocation.

3 DETAILS OF THE REPORT

- 3.1 *Background*
- 3.2 The last year has seen a new administration begin work following the council and mayoral election of May 2022. The council has created a new strategic plan for the 2022 -2026 period and started investing in a range of services to delivering strategic improvement in the way the council serves its residents. We are now in the second year of the mayoral administration. A new annual delivery plan for Year 2 was agreed at July's Cabinet setting ambitious targets with the focus on improvement and delivery.
- 3.3 The Strategic Plan 2022-24 adopted eight new corporate priorities that provide a framework for action to improve services and being about strategic change for Tower Hamlets on 1st August 2022. This Plan translates mayoral priorities into operational deliverables and eight strategic priorities. Through monitoring key deliverables published in the Strategic Plan, the council can support and implement strategic improvements for the borough.
- 3.4 Summary Status

RAG Status	Y1Q1	Y1Q2	Y1Q3	Y1Q4	Y2Q1
Green	20	18	21	25	21
Amber	7	10	5	5	6
Red	6	6	9	10	4
No data currently	2	1	0	3	7
Data only	9	9	9	6	6
Reported annually	5	5	5	0	5
Service not operational	2	2	2	2	2
Total	51	51	51	51	51

Performance Summary

3.5 At the end of Quarter 1 (April to June 2023), 51 performance indicators are reported in 7 categories as follows:

- 21 have met or exceeded their target (Green)
- 6 are between target and minimum (Amber)
- 4 are below target (Red)
- 7 have no data currently (this number will decrease closer to cabinet as data arrives)
- 6 data only (contextual information)
- 5 are reported annually,
- 2 the service is not operational yet.

Under 'No data currently' for 2 indicators data will be available in August 2024, and another 3 indicators will be available at the end of September 2023 and one is reported in arrears in Q3 as validated data for Q1 published by the Department of Levelling Up, Housing and Communities.

During April, May and June 2023 a number of services continue to steadily deliver across key services and a range of priority themes related to the Strategic Plan.

To help tackle the cost of living crisis we provided 477 tonnes of food to food aid organisations to distribute in the borough and 21,437 children and young people attended holiday activities and food programme during the school holidays.

To improve local housing conditions, 734 privately rented properties were visited to check for compliance with licensing schemes for homes in multiple occupation. To 'Accelerate Education' 1, 709 young people registered with the Council's youth centres since April and 7, 684 children supported by the Early Help Children and Family Service. To boost culture, business, jobs and leisure we delivered a higher number of events with community street parties held to celebrate the King's Coronation in June. 41 events were delivered. To boost local prosperity, 982 new jobs, training and apprenticeship opportunities were secured for local people. To Invest in public services, 302 residents successfully quit smoking for 4 weeks. And to empower communities and fight crime, 6,378 hours of uniformed patrols were delivered by the Safer Neighbourhood Operations Service during April, May and June.

Tackling the cost of living (Priority one)

- 3.6 We monitor six performance indicators under five measures (1.01 -1.05) for this priority. Two are reported annually; there is currently no data for one indicator (at the time of writing this report), one indicator has fallen short of its Q1 target, and two are meeting or exceeding its Q1 target.

Two Annually Reported KPIs

- 3.7 We are tackling the cost-of-living crisis by investing £1.1 million per year to support young people into post-16 education through the Education Maintenance Allowance (EMA) and the University Bursary Award (UBA). Data for (KPI 001) EMA and (KPI 002) UBA is reported annually at the end of the academic year.

One No Data KPI

- 3.8 There is currently no data available for (KPI 003) Percentage of homelessness cases prevented or relieved. This measure is reported in arrears as validated data for Q1 which is set to be published by the Department of Levelling Up, Housing and Communities in Q3. The second measure is likely to be reported prior to the cabinet report publication, although it is noteworthy that this measure was below the minimum threshold during all of 2022-23.

One Red KPI

- 3.9 (KPI 004) 71 people presenting as homeless were supported into sustainable accommodation in Q1 which is below the minimum threshold of 99 people.

Two Green On track KPIs

- 3.10 (KPI 005) Number of attendances to holiday activities and food programme during school holidays exceeded its Q1 target of 70,000 by 6,575 with 76,575 attendances. This service is performing almost 10% over target.
- 3.11 (KPI 006) Tonnes of food provided to aid food organisations also exceeded its Q1 target of 450 tonnes by 27 tonnes with 477 tonnes of food distributed and on track and rated Green.

Homes for the Future (Priority two)

- 3.12 We monitor five performance indicators under 3 measures (2.01, 2.07, 2.09 measures) for this priority. 3 indicators are Data Only, 1 indicator is Amber and 1 is at or above its Q1 target.

Three Data Only KPIs

- 3.13 These are market led KPIs. (KPI 007) There were 74 Net additions to the housing stock. The figures may change further to detailed checks of the information behind the numbers; it is expected the completed homes figures will increase. However, the low numbers reflect the current issues in the housing market and wider economy and the uncertainty created by requirement for two staircases in buildings over 30m (and government recently announced that will apply to residential developments above 18m, which will impact more schemes). Negotiations continue with developers to unblock schemes and secure the maximum level of affordable housing.

3.14 (KPI 008) 26 Number of affordable homes were consented in Q1. The low numbers reflect the current issues in the housing market and the uncertainty created by requirement for two staircases in buildings over 18m (reduced from the 30m originally consulted on). The Planning team continue to work with applicants to bring forward schemes and maximise affordable housing and are also investigating barriers to progress, particularly within the planning system to speed up the issuing of planning decisions.

3.15 (KPI 009) 54 Number of affordable homes were delivered in Q1. The council has limited influence over the build out of schemes. Completions coming on stream now will have received permission a number of years ago. The planning team are talking to developers to understand blockages to delivery, how the staircase requirements are impacting consented schemes and to support the delivery of affordable homes.

One Amber KPI

3.16 (KPI 010) 49% Lets were achieved to overcrowded households in Q1. This exceeds the minimum 48% threshold for Q1 and falls below 53% Q1 target.

One Green On track KPI

3.17 (KPI 011) Number of privately rented properties visited has exceeded its Q1 target of 437 by 297 with 734 visits completed. This KPI is on track and Green. In year one, this measure underperformed, so this is a sign the service has improved efficiency regarding visits.

Accelerate Education (Priority three)

3.18 We monitor 18 performance indicators under 8 measures. (3.01, 3.02, 3.06, 3.17, 3.19, 3.20, 3.21, 3.22) for this priority. 2 are Amber, 3 Data only, 7 Green, 4 No data currently (at the time of writing this report), and 2 where the is service is not operational yet.

Two Amber KPIs

3.19 (KPI 022) Percentage of Idea Store learners who pass a Skills for Life course is slightly below Q1 target of 95% and stands at 94%. This figure will be updated over the summer period once all results are returned and uploaded. This KPI has been rated Amber subject to a further update.

3.20 (KPI 028) % of Care Leavers aged 17-25 who are in education, employment or training (EET) has fallen short of its Q1 target of 70% with 66% care leavers who are EET due to a number of issues affecting the data around immigration, right to work status and cost of living crisis. The service anticipate that at the start of the new academic year in September/October 2023 there will be a fall in the NEET figures. This KPI is Amber.

Three Data Only KPIs

3.21 (KPI 020) The number of active education, health and care (EHC) plans is a demand led service, and as such does not have strategic targets. The demand is monitored as a strategic interest, and demand has risen and continues to do so. There are 4,284 active plans; within the last year, demand

for the service has risen considerably by 606 new active plans in place since last year's Q1 2022-23 figure of 3,678 active plans. Additional staffing is being allocated to maintain current plans and complete initial assessments for new plans within the statutory 20-week timeline.

3.22 (KPI 027) 245 number of children were subject to protection plans in Q1. As this service is demand led it is rated as 'Data Only'.

3.23 (KPI 029) 294 number of children were looked after in Q1. This is a demand led service so rated as Data Only.

Seven Green On track KPIs

3.24 (KPI 016) Number of young people who contacted and registered with the Council's and Council commissioned youth centres exceeded its Q1 target of 1,450 by 259 with 1,709 contacted and registered. This KPI is on track and Green.

3.25 (KPI 017) The number of users who regularly attend the Council's and Council commissioned youth centres exceeded its Q1 target of 1000 by 286 with 1286 young people attending. This KPI is on track and Green.

3.26 (KPI 018) The number of young people engaged with the Council's and Council commissioned youth centres who achieve a **recorded** outcome exceeded its Q1 target of 463 by 31 more young people achieving a recorded outcome. This means that in Q1 494 young people engaged with the Council's and Council commissioned youth centres who achieved a recorded outcome. This KPI is on track and Green.

3.27 (KPI 019) 150 young people who engaged with the Council's and Council commissioned youth centres achieved an **accredited** outcome and meeting the Q1 target. This KPI is on track and Green.

3.28 (KPI 021) % of education, health and care (EHC) assessments completed within 20 weeks exceeded its Q1 target of 35% and currently stands at 50%. This follows concerted efforts to ensure that EHC assessments are completed in a timely manner. This KPI is on track and Green.

3.29 (KPI 023) The number of children supported by the Early Help Children and Family Service exceeded its Q1 target of 70,000 by 684 more children supported. In Q1 7,684 children were supported by the Early Help Children and Family Service. A Tower Hamlets Early Help Strategy 2023-2025 is in place. This is on track and Green.

3.30 (KPI 024) % of contacts into MASH that are reviewed and progressed within timescales has met its Q1 target of 95%. This is KPI is on track and rated Green.

Four No data currently

3.31 (KPI 012) Q1 data for Number of primary school pupils in KS2 receiving council-funded free school meals will be available in August 2023 but is not

available at the time of writing this report. (KPI 013) % of primary school pupils in KS2 receiving council-funded FSM will also be available in August 2023.

- 3.32 (KPI 025) Rate of first-time entrants to the Youth Justice system Q1 data will be available end of September 2023. (KPI 026) % of young people that re-offend system Q1 data will also be available end of September 2023. The Youth Justice Board publish the data nationally and will not be available until end September 2023. Lower performance is better for this measure.

2 Service not operational KPIs

- 3.33 (KPI 014 & KPI 015) Q1 data for Number of secondary school pupils receiving council-funded FSM and % of secondary school pupils receiving council-funded FSM is not yet available as the Service is not operational. It is due to commence with the new school year, with data beginning to be collected in late Q2.

Boost culture, business, jobs and leisure (Priority four)

- 3.34 We monitor four performance indicators under four measures (4.01, 4.03, 4.12, 4.16) for this priority. 3 are Green meeting or exceeding its Q1 set target, and 1 KPI is rated Amber.

Three Green On track KPIs

- 3.35 (KPI 030) 41 number of arts events were delivered and exceeding its Q1 set target of 35. The higher number of events were due to community street parties and community park events to celebrate the King's Coronation in June 2023. This KPI is on track on rated Green.
- 3.36 (KPI 032) The number of new jobs, training and apprenticeship opportunities enabled for local people exceeded its Q1 target of 625 by 357 more opportunities for local people to increase their prosperity with 982 new jobs, training and apprenticeship opportunities enabled for local people. This KPI is on track and Green.
- 3.37 (KPI 033) 279 enterprises were supported through the council's business programmes in Q1 resulting in 116 more enterprises supported and exceeding the Q1 target of 163. After strong performance in Q1 we remain on target to reach our annual profiles for this reporting indicator. This KPI is on track on rated Green.

Amber KPIs

- 3.38 (KPI 031) In Q1 47.8% of leisure centre member base were female, and slightly below its Q1 target of 49.2% and rated Amber. This is a positive movement on female membership base throughout the borough with a slight increase with additional programmed activity.

Invest in Public services (Priority five)

- 3.39 We monitor six performance indicators under two measures (5.07 and 5.10) for this priority. 3 are Green meeting or exceeding its Q1 set target, 1 KPI is reported annually, 1 KPI is Amber and 1 KPI is rated Red.

Three Green On track KPIs

- 3.40 (KPI 035) There were 59.7 permanent admissions to residential and nursing care 65+ per 100,000 in Q1. The outturn for Q1 is within the set target of 79. This metric is based on a rate calculation and is cumulative, meaning the number will grow each quarter up to end of Q4 (315). Lower is better for this metric i.e. by year end we are aiming to have an admission rate below 315 per 100,000 people for the full year.
- 3.41 (KPI 039) Number of smoking cessation 4 week quits. An estimated 302 people registered to this programme. The actual report will be available by the end of August 2023 but is not available at the time of writing this report. This is on track and Green.
- 3.42 (KPI 040) Number of smoking cessation 4 week quits (BAME). An estimated 160 from ethnic minority backgrounds registered to this programme. The actual report will be available by the end of August 2023 but is not available at the time of writing this report. This is on track and Green.

One Red KPI

- 3.43 (KPI 036) % of people who are signposted to find appropriate advice & support in the wider community that helps them to maintain their independence. The minimum target of 60% was missed by three percentage points in Q1. Tower Hamlets Connect is making appropriate referrals, which is positive. It is too early to see if this is an outlier or ongoing trend. The 57 percent rate may well reflect an increase in needs, which will need to be explored further. This is graded Red.

One Reported Annually KPI

- 3.44 (KPI 037) The indicator for overall satisfaction with care and support services received is reported annually. It is expected that the findings from the Adult Social Care survey 2022-23 will be published mid-autumn this year.

Amber KPIs

- 3.45 (KPI 038) 83% service users surveyed who agree with the statement "Overall I have a positive experience of the services I am receiving from the homecare agency" which is above Q1 minimum target of 80% and below 85% and Amber.

Empower Communities and Fight Crime (Priority six)

- 3.46 We monitor four performance indicators under one measure (6.02) for this priority. 3 are Green meeting or exceeding its Q1 set target, and 1 KPI has no data as it is published by National Drug Treatment Monitoring System (NDTMS) on 28th of September 2023.

3 Green On track KPIs

- 3.47 (KPI 041) 60 upgraded CCTV cameras are operational exceeding its set target of 26 for Q1. 350 upgrades is the overall program target. 247 was

completed on 2022/23, with a delay due to the global supply chain, leaving 103 outstanding. This is on track and Green.

- 3.48 (KPI 042) 6, 378 number of hours of uniformed patrols delivered by the Safer Neighbourhood Operations Service exceeded its set target of 3,750 for Q1. This is on track and Green.
- 3.49 (KPI 043) 97% Victims of violence against women and girls who feel safer after engaging with commissioned provider exceeding its set target of 80% for Q1. This is on track and Green.

No Data KPI

- 3.50 (KPI 044) Adults with substance misuse treatment need who successfully engage in community-based structured treatment following release from prison – this data is published in September by an external body (NDTMS).

A Clean and Green future (Priority seven)

- 3.51 We monitor five performance indicators under five measures (7.08, 7.10, 7.11, 7.13, 7.20) for this priority. 2 KPIs are Green meeting and currently or exceeding its Q1 set target, 2 KPIs are graded No data currently and 1 KPI is below target and graded Red.

Three Green On track KPIs

- 3.52 (KPI 045) *Zero Number of trees planted in Q1 and reflects the fact that it is not planting season for trees (Trees are being routinely planted during quarters 3 and 4). Batches of projected trees are currently reserved with the dedicated contractor for the upcoming planting season and the service continues to monitor and review these arrangements should plans alter throughout the year. This is on track and Green.*
- 3.53 (KPI 047) 379% percentage of enforcement actions to fly-tip incidents exceeding its set target of 150% for Q1. This measure looks at the ratio of enforcement action to fly-tips reported by residents and crew. This is on track and Green.

One No Data KPI

- 3.54 (KPI 034) Number of missed collections per 100,000 households is currently waiting for Q1 data at the time of writing this report.

Two Red KPIs

- 3.55 (KPI 046) The overall recycling rate as of Quarter 1 2023-24 is 16.35% (provisional). This is a downturn in our rate in Q1 2022-23 (17.0%). The target for 2023-24 is 22%. 23,199 tonnes of household waste collected and 3,761.11 of this was recycled, reused, or composted. This shows a 0.6% decrease in the total household waste collected and a 4.2% decrease in the recycling collected compared to Q1 2022/23.
- 3.56 The main aspects affecting our recycling rate are:
- 1) The overall contamination rate in our dry recycling (30.09% compared to 27.35% in 2022-23 and 23.7% in 2021-22).

- 2) Increase in overall dwellings in the Borough has a direct impact on the amount of household residual waste generated. The total number of dwellings given by WasteDataFlow in 2023-24 is 144,240, whereas, in 2022-23, this number was 140,210. This represents a 2.87% increase from last year.
 - 3) Infrastructure for recycling services has not kept pace with the rate of property growth and growth in waste arisings and affects the amount of recycling collected.
 - 4) New Government regulations for the disposal of upholstered seating containing POPs (Persistent Organic Pollutants) establishes that these items cannot be recycled and must be disposed of by incineration. (Estimated 115 tonnes per month diverted from recycling to the residual waste stream).
 - 5) In June 2022, re-direction of street litter collected from parks was inadmissible for recycling due to high levels of dog excrement (Estimated 65 tonnes per month diverted from recycling to residual stream).
- 3.57 The mitigatory action taken by the service include a range of projects to increase the recycling rate:
- i. *Targeted communications* to encourage participation in the kerbside food and garden waste service;
 - ii. *Route optimisation* for the dry recycling collections;
 - iii. *Flats project*: aims to improve infrastructure at blocks of flats and on estates and to provide educational information for residents. Surveys underway at several blocks. New infrastructure is rolling out and expect that this will encourage residents to recycle more and reduce contamination;
 - iv. A new contamination campaign launched in January 2023 to encourage residents to recycle more and contaminate less continues to promote recycling;
 - v. *Programme of engagement activities and events* continues to encourage recycling and waste minimisation;
 - vi. We are currently *auditing the calculations* used to determine the household/non-household residual waste split. This will help reconcile the amount of household residual waste generated. It is difficult to predict when this KPI will be on track given the challenges facing the service as the current measures will take some time to effect change and we forecast that the recycling rate will remain low for the rest of 2023/24. We anticipate that actions taken will improve performance and positive results will start to show in 2024/25.
- 3.58 (KPI 048) 125 Children engaged in school cycle schemes during Q1 and which is below the minimum target of 297 and below the target of 330. The service has been affected by a change of supplier following re- tender of the contract in April as well as instructor availability. The mitigatory action taken by the service to bring this back on track includes escalating at the managing director level with the supplier. The supplier has since managed to recruit more instructors and carry out some additional cycle training during school summer holidays to make up for the training they were unable to deliver during the summer term. The service is therefore anticipating that

performance will improve during Q2 (but still remains below the target) and see further improvements in Q3 and Q4 to meet/exceed the quarterly targets.

A Council that listens and works for everyone (Priority eight)

3.59 We monitor three performance indicators under three measures (8.06, 8.07, 8.13) for this priority. 1 KPI Amber, and 2 KPIs are reported annually.

One Amber KPI

3.60 (KPI 049) 32% percent of the top 5% of earners from Black, Asian and multi-ethnic communities slightly short of its Q1 target of 35% but has met its minimum target of 32%. Work is in progress and rated as Amber.

3.61 Given the relatively small numbers in the top 5% of earners, minimal changes in staff numbers can disproportionately impact the percentage figure. In March 2021, Tower Hamlets had the third highest percentage of top 5% earners who are Black, Asian or Multi Ethnic across all London boroughs, with 31%.

3.62 The service is taking action to address Black, Asian and Multi-Ethnic staff representation at the senior level through the Council's Workforce to Reflect the Community Strategy and Action Plan. This includes work to address the Council's pay gaps, improve talent management, leadership and development, recruitment, coaching and mentoring. These interventions will take time to show results. All directorates now have directorate action plans and are developing targets as part of these to improve representation year on year from 2023/24.

Two Reported Annually KPI

3.63 (KPI 050) Residents' perception of being involved in decision-making and (KPI 051) Residents' perception of being kept informed by the council data comes from the Annual Resident Survey which is currently being verified and will be released when final figures are available.

Update to Q4 Year 1 Annual Delivery Plan of the Strategic Plan 2022-2024

3.64 Following some additional data gathering, Affordable home completions are higher than reported at year end (688 instead of 585). This also raises net additions to housing stock from 2330 to 2433.

Correction to 2023-24 Annual Delivery Plan

3.65 The target range for youth re-offending rates has been re-calibrated to a 30% target and a 40% minimum threshold (the lower the better). In 2022-23 the outturn figure was 29% (33% in London).

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. Many of the strategic outcomes and supporting activities are designed to reduce inequalities and foster community cohesion.

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 Best Value (BV) Implication

- 5.3 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.

5.4 Sustainable action for greener environment

- 5.5 Priority 7: A clean and green future. 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 cycling training programmes.

6 COMMENTS OF THE CHIEF FINANCE OFFICER

- 6.1 There are no direct financial implications of this report, as it is reporting the status of performance measures. Where performance does impact on finances, these are addressed and reported through the Council's existing financial framework.

7 COMMENTS OF LEGAL SERVICES

- 7.1 The Council is under a general Duty of Best Value 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.”
- 7.2 Under the Duty of Best Value, therefore, the Council should consider overall value, including economic, environmental and social value, when reviewing service provision.
- 7.3 The Monitoring of performance objectives therefore assists in meeting the Best Value Duty placed upon the Council.

Linked Reports, Appendices and Background Documents

Linked Report

- None

Appendices

- Review the status of 51 performance measures in Q1 tracking the delivery of Year 2 of the Strategic Plan 2022-2024 (See Appendix a).

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

- None

Officer contact details for documents:

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Strategic delivery and performance report

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Year Two Delivery Plan 2023-24 Q1 review



Our delivery and performance

Current performance measures overview



Across the strategic plan, the current status of performance measures is shown with Red, Amber, and Green status to help us support services as they work to meet their aims.

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Some measures don't have data yet, such as winter tree planting.

Some measures don't have a target, such as universal free school meals.

RAG Status	Y1Q1	Y1Q2	Y1Q3	Y1Q4	Y2Q1
Green	20	18	21	25	21
Amber	7	10	5	5	6
Red	6	6	9	10	4
No data currently	2	1	0	3	7
Data only	9	9	9	6	6
Reported annually	5	5	5	0	5
Service not operational	2	2	2	2	2
Total	51	51	51	51	51

Priority 1

Tackling the cost of living



Ref	Measure	Directorate	2022-2023 Outturn	2022-2023 Target	Q1 Outturn	Q1 Min Target	Q1 Target	Q1 RAG
KPI 001	Number of EMAs awarded	Children's Services	803	1250	Reported annually	Reported annually	Reported annually	Reported annually
KPI 002	Number of university bursaries awarded	Children's Services	400	400	Reported annually	Reported annually	Reported annually	Reported annually
KPI 003	Percentage of homelessness cases prevented or relieved	Housing & Regeneration	37%	50%	No data currently	36%	40%	No data currently
KPI 004	Number of homeless supported into sustainable accommodation	Housing & Regeneration	317	470	71	99	110	Red
KPI 005	Number of attendances to holiday activities and food programme during school holidays	Housing & Regeneration	76,575	70,000	21,437	12,700	13,000	Green
KPI 006	Tonnes of food provided to food aid organisations	Housing & Regeneration	907	600	477	405	450	Green

Priority 1

Tackling the cost of living crisis

Commentary on measures in green, amber or red at Q1



Ref	Measure	Directorate	Q1 Performance Commentary
KPI 001	Number of EMAs awarded	Children's Services	The number EMAs awarded to support young people who want to stay in education post-17 is reported annually.
KPI 002	Number of university bursaries awarded	Children's Services	The cumulative total of bursaries that have been paid out. This is reported annually.
KPI 003	Percentage of homelessness cases prevented or relieved	Housing & Regeneration	This figure is reported in arrears as validated data for Q1 is set to be published by the Department of Levelling Up, Housing and Communities in Q3.
KPI 004	Number of homeless supported into sustainable accommodation	Housing & Regeneration	The target was not met primarily due to a significant shortage of affordable Private Rented Supply (PRS) available to rehouse homeless households. The acute shortage of PRS supply has been experienced during every quarter of 2022/23. All London boroughs are reporting a sudden shrinking of the affordable PRS sector so this is not a problem unique to Tower Hamlets. Rising rents have arisen due to several factors including rising energy costs, rising mortgage costs, post-covid increased demand, properties returning to owner-occupation as small buy-to-let landlords exit the sector.

Priority 1

Tackling the cost of living crisis

Commentary on measures in green, amber or red at Q1



Ref	Measure	Directorate	Q1 Performance Commentary
KPI 005	Number of attendances to holiday activities and food programme during school holidays	Housing & Regeneration	The HAF programme is funded by the Department for Education and is for children and young people in reception up to Year 11 (inclusive) who receive benefit-related free school meals. In Q1 21,437 attended holiday activities and food programme during school holidays, significantly exceeding our Q1 target of 13,000
KPI 006	Tonnes of food provided to food aid organisations	Housing & Regeneration	477 tonnes of food was provided to food aid organisations, by the Tackling Poverty Team ad exceedng Q1 target of 450.

Priority 2

Homes for the future



Ref	Measure	Directorate	2022-2023 Outturn	2022-2023 Target	Q1 Outturn	Q1 Min Target	Q1 Target	Q1 RAG
KPI 007	Net additions to the housing stock	Housing & Regeneration	2,330	3,473	74	Annual	Annual	Data only
KPI 008	Number of affordable homes consented	Housing & Regeneration	591	700	26	Annual	Annual	Data only
KPI 009	Number of affordable homes delivered	Housing & Regeneration	585	1,000	54	Annual	Annual	Data only
KPI 010	Lets to overcrowded households	Housing & Regeneration	48%	52%	49%	48%	53%	Amber
KPI 011	Number of privately rented properties visited	Housing & Regeneration	No data	No data	734	437	437	Green



Ref	Measure	Directorate	Q1 Performance Commentary
KPI 007	Net additions to the housing stock	Housing & Regeneration	<p><u>1. What the data shows</u> There were 74 net additions to the housing stock in Q1.</p> <p><u>2. Why is this below expected?</u> These figures may change as we carry out a detailed check of the information behind the numbers and we expect the completed homes figures to increase. However, the low numbers reflect the current issues in the housing market and wider economy and the uncertainty created by requirement for two staircases in buildings over 30m (and government recently announced that will apply to residential developments above 18m, which will impact more schemes).</p>
KPI 008	Number of affordable homes consented	Housing & Regeneration	<p><u>1. What the data shows</u> 26 affordable homes consented in Q1.</p> <p><u>2. Why is this below expected?</u> The low numbers reflect the current issues in the housing market and the uncertainty created by requirement for two staircases in buildings over 18m (reduced from the 30m originally consulted on). The Planning team continue to work with applicants to bring forward schemes and maximise affordable housing and are also investigating barriers to progress, particularly within the planning system to speed up the issuing of planning decisions.</p>



Ref	Measure	Directorate	Q1 Performance Commentary
KPI 009	Number of affordable homes delivered	Housing & Regeneration	<p><u>1. What the data shows</u> 54 affordable homes were delivered in Q1.</p> <p><u>2. Mitigatory action</u> The council has limited influence over the build out of schemes. Completions coming on stream now will have received permission a number of years ago. The planning team are talking to developers to understand blockages to delivery, how the staircase requirements are impacting consented schemes and to support the delivery of affordable homes.</p>
KPI 010	Lets to overcrowded households	Housing & Regeneration	<p><u>1. What the data shows</u> Percentage of properties let to overcrowded households met the minimum target although it slightly below Q1 target. 49% lets to overcrowded households achieved in Q1 and exceeding Q1 minimum target of 48%</p> <p><u>2. Why is this below target?</u> Insofar as the Council operates a choice-based system of allocation, allocation of properties in any given quarter is ultimately determined by the bidding approach of applicant.</p> <p><u>3. Mitigatory action taken by the service</u> Given the measures close proximity to the target and limited ability to impact performance in this context, no particular actions have been proposed.</p> <p><u>4. When will this be on track?</u> This measure is expected to be back on target next quarter.</p>

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Performance summary

Priority 2

Homes for the future

Commentary on measures in green, amber or red at Q1



Ref	Measure	Directorate	Q1 Performance Commentary
KPI 011	Number of privately	Housing & Regeneration	734 privately rented properties were visited in Q1. This exceeded Q1 target of 437.

Priority 3

Accelerate Education



Ref	Measure	Directorate	2022-2023 Outturn	2022-2023 Target	Q1 Outturn	Q1 Min Target	Q1 Target	Q1 RAG
KPI 012	Number of primary school pupils in KS2 receiving council-funded FSM	Children's Services	7,551	No target	Q1 data not available until 21/08/2023	No target	No target	No data currently
KPI 013	% of primary school pupils in KS2 receiving council-funded FSM	Children's Services	No data	No target	Q1 data not available until 21/08/2023	80%	85%	No data currently
KPI 014	Number of secondary school pupils receiving council-funded	Children's Services	No data	No data	Service not operational	No target	No target	Service not operational
KPI 015	% of secondary school pupils receiving council-funded FSM	Children's Services	No data	No data	Service not operational	No target	No target	Service not operational
KPI 016	Number of young people who contacted and registered with the Council's and Council	Children's Services	5,304	3,690	1709	1,305	1,450	Green



Ref	Measure	Directorate	2022-2023 Outturn	2022-2023 Target	Q1 Outturn	Q1 Min Target	Q1 Target	Q1 RAG
KPI 017	Number of users who regularly attend the Council's and Council commissioned youth services	Children's Services	3,336	3,336	1286	900	1,000	Green
KPI 018	Number of young people engaged with the Council's and Council commissioned youth centres who achieve a recorded outcome	Children's Services	1,863	1,600	494	417	463	Green
KPI 019	Number of young people engaged with the Council's and Council commissioned youth centres who achieve an accredited outcome	Children's Services	586	490	150	135	150	Green
KPI 020	Number of active education, health and care (EHC) plans	Children's Services	4,116	No target	4,284	No target	No target	Data only



Ref	Measure	Directorate	2022-2023 Outturn	2022-2023 Target	Q1 Outturn	Q1 Min Target	Q1 Target	Q1 RAG
KPI 021	% of education, health and care (EHC) assessments completed within 20 weeks	Children's Services	31%	53%	50%	32%	35%	Green
KPI 022	Percentage of Idea Store learners who pass a Skills for Life course	Resources	96%	95%	94%	86%	95%	Amber
KPI 023	Number of children supported by the Early Help Children and Family Service	Children's Services	17,778	17,000	7,684	6,300	7,000	Green
KPI 024	% of contacts into MASH that are reviewed and progressed within timescales	Children's Services	98%	95%	95%	90%	95%	Green
KPI 025	Rate of first time entrants to the Youth Justice system	Children's Services	140	250	Q1 data not available until end September 2023.	185	155	No data currently

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Ref	Measure	Directorate	2022-2023 Outturn	2022-2023 Target	Q1 Outturn	Q1 Min Target	Q1 Target	Q1 RAG
KPI 026	% of young people that re-offend	Children's Services	29%	26%	Q1 data not available until end September 2023.	40%	30%	No data currently
KPI 027	Number of children subject to protection plans	Children's Services	214	No target	245	No target	No target	Data only
KPI 028	% of Care Leavers aged 17-25 who are in education, employment or training (EET)	Children's Services	71%	65%	66%	65%	70%	Amber
KPI 029	Number of children looked after	Children's Services	301	No target	294	No target	No target	Data only



Ref	Measure	Directorate	Q1 Performance Commentary
KPI 012	Number of primary school pupils in KS2 receiving council-funded FSM	Children's Services	Q1 data will be available in August 2023
KPI 013	% of primary school pupils in KS2 receiving council-funded FSM	Children's Services	Q1 data will be available in August 2023
KPI 014	Number of secondary school pupils receiving council-funded FSM	Children's Services	This data will be based on service that is not yet up and running, thus we cannot currently report on this.
KPI 015	% of secondary school pupils receiving council-funded FSM	Children's Services	This data will be based on service that is not yet up and running, thus we cannot currently report on this.
KPI 016	Number of young people who contacted and registered with the Council's and Council commissioned youth centres	Children's Services	1709 young people contacted and registered with the Council's and Council commissioned youth centres. Q1 performance has exceeded the set target and this is on track.
KPI 017	Number of users who regularly attend the Council's and Council commissioned youth services	Children's Services	Q1 performance has exceeded the set target



Ref	Measure	Directorate	Q1 Performance Commentary
KPI 018	Number of young people engaged with the Council's and Council commissioned youth centres who achieve a recorded outcome	Children's Services	Q1 performance has exceeded the set target
KPI 019	Number of young people engaged with the Council's and Council commissioned youth centres who achieve an accredited outcome	Children's Services	This has met its Q1 target of 150
KPI 020	Number of active education, health and care (EHC) plans	Children's Services	In the last year, demand for the service has risen considerably, in Q1 22-23 there were 3,678 active plans, Q1 23-24 the figure stands at 4,284. Additional staffing is being allocated to maintain current plans and complete initial assessments for new plans within the statutory 20-week timeline.
KPI 021	% of education, health and care (EHC) assessments completed within 20 weeks	Children's Services	Q1 performance has exceeded the set target. This follows concerted efforts by the team in ensuring EHC assessments are completed in a timely manner.
KPI 022	Percentage of Idea Store learners who pass a Skills for Life course	Resources	The Skills for Life achievement rate is currently at 94%. This figure will be updated over the summer period once all results are returned and uploaded

Priority 3

Accelerate Education

Commentary on measures in green, amber or red at Q1



Ref	Measure	Directorate	Q1 Performance Commentary
KPI 023	Number of children supported by the Early Help Children and Family Service	Children's Services	Q1 performance has exceeded the set target. 7,684 children were supported by the Early Help Children and Family Service which exceeds our Q1 target of 7,000 children. The delivery is informed by the Tower Hamlets Early Help Strategy 2023-2025.
KPI 024	% of contacts into MASH that are reviewed and progressed within timescales	Children's Services	Q1 performance has met the set target
KPI 025	Rate of first time entrants to the Youth Justice system	Children's Services	This data is published nationally by the Youth Justice Board and will not be available until end September 2023. Lower performance is better for this measure.
KPI 026	% of young people that re-offend	Children's Services	This data is published nationally by the Youth Justice Board and will not be available until end September 2023. Lower performance is better for this measure.
KPI 027	Number of children subject to protection plans	Children's Services	This service is demand led.

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Ref	Measure	Directorate	Q1 Performance Commentary
KPI 028	% of Care Leavers aged 17-25 who are in education, employment or training (EET)	Children's Services	<p><u>1. What the data shows</u></p> <p>Young people awaiting Home Office decision disengage from ETE as their focus remains resolving this important issue. The Immigration status of our care-experienced young people also affects Right to Work (RtW) status and ETE workers are not able to source employment/Apprenticeship opportunities without RtW status. Additionally, the service receives referrals from young people seeking asylum in the UK at various times throughout the year and they have to wait for the start of the academic year to start education and/or training. During the period that they are waiting to commence education, they are classified as being NEET.</p> <p><u>2. Why is this below target?</u></p> <p>The rising cost of living has affected the number of young people continuing in education and colleges are reporting an increase in non-attendance. The rising cost of living is also forcing young people to take up easy-access jobs that are not sustainable, working in delivery jobs on casual/zero hour contracts. The service also has a number of young people with conditions and circumstances that are limiting their ability to engage in ETE and this includes mental health issues, parenting, and serving a custodial sentence. All of the above factors are affecting the data regarding ETE.</p>

Priority 3

Accelerate Education

Commentary on measures in green, amber or red at Q1



Ref	Measure	Directorate	Q1 Performance Commentary
KPI 028	% of Care Leavers aged 17-25 who are in education, employment or training (EET)	Children's Services	<p><u>3. Mitigatory action taken by the service</u></p> <p>The frequency of ETE interventions with young people will be increasing, offering more tailored support. Additionally, work will be undertaken with Workpath, Virtual School, and the Through Care Service ETE Team to provide 1 -2-1 ESOL sessions at Kitcat Terrace.</p> <p><u>4. When will this be on track?</u></p> <p>We anticipate that the start of the new academic year in September/October 2023 will see a fall in the NEET figures.</p>
KPI 029	Number of children looked after	Children's Services	This is a demand led service. In Q4 2021-22 there were 335 children looked after. This fell to 301 in Q4 2022-23. The current Q1 data for 2023-24 shows there are now 294 children looked

Priority 4

Boost culture, business, jobs
and leisure



Ref	Measure	Directorate	2022-2023 Outturn	2022-2023 Target	Q1 Outturn	Q1 Min Target	Q1 Target	Q1 RAG
KPI 030	Number of arts events delivered	Communities	191	158	41	28	35	Green
KPI 031	% of leisure centre member base that are female	Communities	47.8%	51.0%	48%	47.8%	49.2%	Amber
KPI 032	The number of new jobs, training and apprenticeship opportunities enabled for local people	Housing & Regeneration	3,866	2,105	982	563	625	Green
KPI 033	Enterprises supported through the council's business programmes	Housing & Regeneration	919	650	279	146	163	Green

Priority 4

Boost culture, business, jobs and leisure
 Commentary on measures in green, amber or red at Q1



Ref	Measure	Directorate	Q1 Performance Commentary
KPI 030	Number of arts events delivered	Communities	41 arts events successfully delivered exceeded our Q1 target of 35. The higher number of events than expected are attributed to community street parties and community park events to celebrate the King's Coronation in June 2023.
KPI 031	% of leisure centre member base that are female	Communities	<p><u>1. What the data shows</u> Positive movement on female membership base throughout the borough with a slight increase with additional programmed activity.</p> <p><u>2. Mitigatory action taken by the service</u> Borough wide campaign to increase participation of W&G's in Q2, growth in programming and female recruitment at local events.</p> <p><u>3. When will this be on track?</u> Benefits of campaign to be realised late in Q2 and early Q3. Programme review to be completed by August.</p>
KPI 032	The number of new jobs, training and apprenticeship opportunities enabled for local people	Housing & Regeneration	982 new jobs, training and apprenticeships opportunities were enabled for local people. This shows that Q1 outturn is particularly strong owing to higher recruitment drives from S106 development activity. In line with progress last year, we expect future quarterly outturns to average out and be closer to the annual target.

Priority 4

Boost culture, business, jobs and leisure

Commentary on measures in green, amber or red at Q1



Ref	Measure	Directorate	Q1 Performance Commentary
KPI 033	Enterprises supported through the council's business programmes	Housing & Regeneration	After strong performance in Q1 we remain on target to reach our annual profiles for this reporting indicator. During Q1, 279 businesses were involved in participating in any of the enterprise support projects that the council runs, exceeding our Q1 target of 163.

Priority 5

Invest in public services



Ref	Measure	Directorate	2022-2023 Outturn	2022-2023 Target	Q1 Outturn	Q1 Min Target	Q1 Target	Q1 RAG
KPI 035	Permanent admissions to residential and nursing care 65+ per	Health and Social Care	312.4	N/A	59.7	88	79	Green
KPI 036	% of people who are signposted to find appropriate advice & support in the wider community that helps them to maintain their independence	Health and Social Care	59%	59%	57%	60%	65%	Red
KPI 037	Overall satisfaction with care and support services received	Health and Social Care	No data	84%	Reported annually	Reported annually	Reported annually	Reported annually
KPI 038	% service users surveyed who agree with the statement "Overall I have a positive experience of the services I am receiving from the homecare agency"	Health and Social Care	90%	70%	83%	80%	85%	Amber



Ref	Measure	Directorate	2022-2023 Outturn	2022-2023 Target	Q1 Outturn	Q1 Min Target	Q1 Target	Q1 RAG
KPI 039	Number of smoking cessation 4 week quits	Health and Social Care	1,150	1,200	302	250	300	Green
KPI 040	Number of smoking cessation 4 week quits (BAME)	Health and Social Care	460	400	160	100	113	Green

Priority 5

Invest in public services

Commentary on measures in green, amber or red at Q3



Ref	Measure	Directorate	Q1 Performance Commentary
KPI 035	Permanent admissions to residential and nursing care 65+ per 100,000	Health and Social Care	This service is demand led which means that the that service provision is based upon the number of service users presenting. 59.7 service users 65+ were placed into permanent admissions to residential and nursing care 65+ per 100,000. This is a positive direction of travel as lower is better and below the Q1 target of 79.
KPI 036	% of people who are signposted to find appropriate advice & support in the wider community that helps them to maintain their independence	Health and Social Care	<p><u>What the data shows?</u> 57% of people signposted to find appropriate advice & support in the wider community that helps them to maintain their independence in Q1. The minimum target of 60% was missed by three percentage points in Q1.</p> <p><u>2. Mitigatory action taken by the service</u> Tower Hamlets Connect is making appropriate referrals, which is positive. It is too early to see if this is an outlier or ongoing trend.</p> <p><u>3. When will this be on track?</u> The 57 percent rate may well reflect an increase in needs, which will need to be explored further.</p>
KPI 037	Overall satisfaction with care and support services received	Health and Social Care	We expect the results from the Adult Social Care Survey 2022/23 to be published mid-autumn this year.

Priority 5

Invest in public services

Commentary on measures in green, amber or red at Q3



Ref	Measure	Directorate	Q1 Performance Commentary
KPI 038	% service users surveyed who agree with the statement "Overall I have a positive experience of the services I am receiving from the homecare agency"	Health and Social Care	<p><u>1. What the data shows</u></p> <p>83% service users expressed a positive experience in the first 3 months of this year. The performance falls short of the target but is above the minimum target. The direction of travel is showing an improving trend in the first quarter.</p> <p><u>2. When will this be on track?</u></p> <p>Q2 should see the service on track given the improvement trend</p>
KPI 039	Number of smoking cessation 4 week quits	Health and Social Care	An estimated 302 people registered to quit smoking for 4 weeks. The actual report will be available by the end of August. This exceeds our target of 250 people.
KPI 040	Number of smoking cessation 4 week quits (BAME)	Health and Social Care	An estimated 160 people from ethnic minority backgrounds registered to quit smoking for 4 weeks. The actual report will be available by the end of August. This exceeds our Q1 target of a 100 people.

Priority 6

Empower Communities and
Fight Crime



Ref	Measure	Directorate	2022-2023 Outturn	2022-2023 Target	Q1 Outturn	Q1 Min Target	Q1 Target	Q1 RAG
KPI 041	Number of upgraded CCTV cameras operational	Health and Social Care	82	75	60	23	26	Green
KPI 042	Number of hours of uniformed patrols delivered by the Safer Neighbourhood Operations Service	Health and Social Care	10,970	10,000	6,378	3,500	3,750	Green
KPI 043	Victims of violence against women and girls who feel safer after engaging with commissioned provider	Health and Social Care	78.5%	77%	97%	75%	80%	Green
KPI 044	Adults with substance misuse treatment need who successfully engage in community-based structured treatment following release from prison	Health and Social Care	42%	37%	No data currently	45%	50%	No data currently

Priority 6

Empower Communities and Fight Crime

Commentary on measures in green, amber or red at Q1



Ref	Measure	Directorate	Q1 Performance Commentary
KPI 041	Number of upgraded CCTV cameras operational	Health and Social Care	60 upgraded cameras operational in Q1, exceeding the quarterly target of 26. 350 upgrades is the overall program target. 247 was completed on 22/23, with a delay due to the global supply chain, leaving 103 outstanding. The target has been adjusted to 26 per quarter. The current performance indicates that we will complete the installation of the CCTV program in Q2 23/24.
KPI 042	Number of hours of uniformed patrols delivered by the Safer Neighbourhood Operations Service	Health and Social Care	From Q1 23/24, the number of hours of uniformed patrols delivered by the Safer Neighbourhood Operations Service includes those delivered by Tower Hamlets Enforcement Officers. The target for 23/24 is higher than last year to account for their contribution. In Q1 6,378 hours of uniformed patrols were delivered, exceeding the Q1 target of 3,750.
KPI 043	Victims of violence against women and girls who feel safer after engaging with commissioned provider	Health and Social Care	97% of women and girls felt safer during Q1 after engaging with commissioned provider, exceeding our Q1 target of 80%. This measure is performing above target.

Priority 6

Empower Communities and Fight Crime

Commentary on measures in green, amber or red at Q1



Ref	Measure	Directorate	Q1 Performance Commentary
KPI 044	Adults with substance misuse treatment need who successfully engage in community-based structured treatment following release from prison	Health and Social Care	The National Drug Treatment Monitoring System (NDTMS) are due to publish Q1 2023/24 information on Thursday 28th September 2023.

Priority 7

A clean and green future



Ref	Measure	Directorate	2022-2023 Outturn	2022-2023 Target	Q1 Outturn	Q1 Min Target	Q1 Target	Q1 RAG
KPI 045	Number of trees planted	Communities	522	200	0	0	0	Green
KPI 034	Number of missed collections per 100,000 households	Communities	No data	No target	No data currently	45	50	No data currently
KPI 046	Level of household recycling	Communities	16.3%	22.0%	16.3%	20.3%	22.0%	Red
KPI 047	Percentage of enforcement actions to fly-tip incidents	Communities	168%	125%	379%	135%	150%	Green
KPI 048	Children engaged in school cycle schemes	Communities	1,379	1,100	125	297	330	Red

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Priority 7

A clean and green future

Commentary on measures in green, amber or red at Q1



Ref	Measure	Directorate	Q1 Performance Commentary
KPI 045	Number of trees planted	Communities	Trees are planned to be planted during Quarters 3 and 4. Q1 outturn reflects the fact that it is not a planting season for trees (Trees are being routinely planted during quarters 3 and 4). Batches of projected trees are currently reserved with the dedicated contractor for the upcoming planting season and the service continues to monitor and review these arrangements should plans alter throughout the year.
KPI 034	Number of missed collections per 100,000 households	Communities	Commentary outstanding.



Ref	Measure	Directorate	Q1 Performance Commentary
KPI 046	Level of household recycling	Communities	<p><u>1) What the data shows?</u></p> <p>The overall recycling rate as of Quarter 1 2023-24 is 16.35% (provisional). This is a downturn in our rate in Q1 2022-23 (17.0%). The target for 2023-24 is 22%. 23,199 tonnes of household waste was collected and 3,761.11 of this was recycled, reused, or composted. This shows a 0.6% decrease in the total household waste collected and a 4.2% decrease in the recycling collected compared to Q1 2022/23.</p> <p>BENCHMARKING DATA: This is work in progress to find up to date info.</p> <p><u>2) Why is this below target?</u></p> <p>The main aspects affecting our recycling rate are:</p> <ol style="list-style-type: none"> The overall contamination rate in our dry recycling (30.09% compared to 27.35% in 2022-23 and 23.7% in 2021-22). Increase in overall dwellings in the Borough has a direct impact on the amount of household residual waste generated. The total number of dwellings given by WasteDataFlow in 2023-24 is 144,240, whereas, in 2022-23, this number was 140,210. This represents a 2.87% increase from last year. Infrastructure for recycling services has not kept pace with the rate of property growth and growth in waste arisings and affects the amount of recycling collected. New Government regulations for the disposal of upholstered seating containing POPs (Persistent Organic Pollutants) establishes that these items cannot be recycled and must be disposed of by incineration. (Estimated 115 tonnes per month diverted from recycling to the residual waste stream). In June 2022, re-direction of street litter collected from parks was inadmissible for recycling due to high levels of dog excrement (Estimated 65 tonnes per month diverted from recycling to residual stream).



Ref	Measure	Directorate	Q1 Performance Commentary
KPI 046	Level of household recycling	Communities	<p><u>3. Mitigatory action taken by the service</u></p> <p>c) Service are delivering a range of projects to increase the recycling rate:</p> <ul style="list-style-type: none"> i. Targeted communications to encourage participation in the kerbside food and garden waste service; ii. Route optimisation for the dry recycling collections; iii. Flats project: aims to improve infrastructure at blocks of flats and on estates and to provide educational information for residents. Surveys underway at several blocks. New infrastructure is rolling out and expect that this will encourage residents to recycle more and reduce contamination; iv. A new contamination campaign launched in January 2023 to encourage residents to recycle more and contaminate less continues to promote recycling; v. Programme of engagement activities and events continues to encourage recycling and waste minimisation; vi. We are currently auditing the calculations used to determine the household/non-household residual waste split. This will help reconcile the amount of household residual waste generated. <p><u>4. When will this be on track?</u></p> <p>The current measures will take some time to effect change and we forecast that the recycling rate will remain low for the rest of 2023/24. We anticipate that actions taken will improve performance and positive results will start to show in 2024/25.</p>

Priority 7

A clean and green future

Commentary on measures in green, amber or red at Q1



Ref	Measure	Directorate	Q1 Performance Commentary
KPI 047	Percentage of enforcement actions to fly-tip incidents	Communities	Q1 target exceeded. Increased enforcement activity focussing on targeting fly tipping hotspots has continued in Q1 resulting in high waste investigations.
KPI 048	Children engaged in school cycle schemes	Communities	Q1 outturn is below the target of 330 as the service has been affected by a change of supplier following retender of the contract back in April along with issues with instructor availability as a consequence. This matter has been escalated at the managing director level with the supplier. The supplier has since managed to recruit more instructors and also to carry out some additional cycle training during school summer holidays to make up for the training they were unable to deliver during the summer term. The service is therefore anticipating that performance will improve during Q2 (but still remain under the target) and further improve in Q3 and Q4 to meet/exceed the quarterly targets.

Priority 8

A council that listens and works for everyone



Ref	Measure	Directorate	2022-2023 Outturn	2022-2023 Target	Q1 Outturn	Q1 Min Target	Q1 Target	Q1 RAG
KPI 050	Residents' perception of being involved in decision-making	Chief Executive's Office	No data	No target	Reported annually	No target	No target	Reported annually
KPI 051	Residents' perception of being kept informed by the council	Chief Executive's Office	No data	No target	Reported annually	No target	No target	Reported annually
KPI 049	Percentage of top 5% of earners from Black, Asian and multi-ethnic communities	Resources	33.1%	35%	32.43%	32.0%	35.0%	Amber

Priority 8

A council that listens and works for everyone
 Commentary on measures in green, amber or red at Q1



Ref	Measure	Directorate	Q1 Performance Commentary
KPI 050	Residents' perception of being involved in decision-making	Chief Executive's Office	The results from the Annual Resident Survey 2022 have not been published yet.
KPI 051	Residents' perception of being kept informed by the council	Chief Executive's Office	The results from the Annual Resident Survey 2022 have not been published yet.

Priority 8

A council that listens and works for everyone
 Commentary on measures in green, amber or red at Q1



Ref	Measure	Directorate	Q1 Performance Commentary
KPI 049	Percentage of top 5% of earners from Black, Asian and multi-ethnic communities	Resources	<p><u>1. What the data shows</u></p> <p>The top 5% earners who are from Black, Asian and Multi-Ethnic backgrounds is currently 32.43%, which is down 0.45% from the last quarter when it was 32.88%. This is 2.57% below target.</p> <p><u>2. Why is this below target?</u></p> <p>The actual full time equivalent number of Black, Asian and Multi-Ethnic staff in the top 5% earners has only reduced by 0.40 this quarter. Given the relatively small numbers in the top 5% of earners, these minimal changes have impacted the percentage figure. In March 2021, Tower Hamlets had the third highest percentage of top 5% earners who are Black, Asian or Multi Ethnic across all London boroughs, with 31%.</p> <p><u>3. Mitigatory action taken by the service</u></p> <p>Work continues to address Black, Asian and Multi-Ethnic staff representation at the senior level through the Council's Workforce to Reflect the Community Strategy and Action Plan. This includes work to address the Council's pay gaps, talent management, leadership and development, coaching and mentoring. Directorate targets are also being put in place as part of work to look in more granular detail at where there is under representation, e.g. in specific services or professions.</p> <p><u>4. When will this be on track?</u></p> <p>These interventions will take time to show results. All directorates now have directorate action plans and are developing targets as part of these to improve representation year on year from 2023/24.</p>

<p>Cabinet</p> <p>20 September 2023</p>	 <p>TOWER HAMLETS</p>
<p>Report of: Karen Swift, Divisional Director, Housing and Regeneration</p>	<p>Classification: Unrestricted</p>
<p>Housing Development Capital Programme Additions</p>	

Lead Member	Councillor Kabir Ahmed, Cabinet Member for Regeneration, Inclusive Development and Housebuilding
Originating Officer(s)	Rupert Brandon, Head of Housing Supply
Wards affected	All wards
Key Decision?	Yes
Reason for Key Decision	Financial threshold and Significant impact on wards
Forward Plan Notice Published	22.08.23
Strategic Plan Priority / Outcome	Providing Homes for the Future

Executive Summary

This report sets out proposals for additional funding to the Council’s Housing Development Capital Programme, part of the wider HRA Capital Programme.

Funding for additional budget of £73.223m has arisen principally from reductions made on other capital projects and through increased Right to Buy receipts.

A number of schemes are highlighted as additional ones in the programme and the report seeks Mayoral approval to allow, after consultation, for changes in the programme overall including those in the report.

To help deliver the increased capital programme additional staffing resources are required. These include Housing, Capital Delivery, Procurement and Legal teams. The report seeks approval for the increased revenue costs to be funded via the HRA. Schemes that come to fruition will have staff revenue costs off set by relevant capitalisation.

Appendix 1 provides the existing programme.

Appendix 2 sets out comparative recent performance on overall housing delivery.

Recommendations:

The Mayor in Cabinet is recommended:

1. To approve the increased budget of £73.223m to the Housing Development Capital programme.
2. To approve the schemes listed as additions to the programme as set out in paragraph 3 table 1.
3. To approve the changes listed within the existing programme as set out in paragraph 3 table 3.
4. To approve that subject to prior consultation with the Mayor by the Corporate Director of Housing and Regeneration and the Corporate Director of Resources schemes can be amended and substituted and that additional schemes can be added provided that the capital sum set out in recommendation 1 above is not exceeded.
5. To approve that subject to prior consultation with the Mayor by the Corporate Director of Housing and Regeneration and the Corporate Director of Resources that should additional funding be identified this can be added to the programme.
6. To note potential additions to the programme in future at paragraph 3 table 2.
7. Approve the increase in budget for additional staff resources as set out in paragraph 3.7
8. To note the existing programme as set out in Appendix 1.
9. To note the comparative performance of the London Borough of Tower Hamlets compared to neighbouring boroughs in the delivery of homes, as set out in Appendix 2.
10. To note the Equalities Impact Assessment / specific equalities considerations as set out in paragraph 4

1 REASONS FOR THE DECISIONS

- 1.1 The 2023-26 HRA Capital Programme approved in March 2023 requires updating following the in-year review of capital schemes in the Council's capital programme. The additional funding will contribute to the supply of affordable housing and the Mayoral target of 1,000 rented social homes a year. The 30-year HRA Business Plan will reflect the additional capital funding.
- 1.2 In order to assist deliver the increased programme additional staff resources are required in both the client team, Housing Supply, and support services of Legal and Procurement.

2 ALTERNATIVE OPTIONS

- 2.1 By not using available resources the schemes contained in the report, and any subsequent additions and substitutions will not be funded and therefore not contributing to new supply.
- 2.2 The absence of additional staff resources will mean the existing staff will find delivery more challenging.

3 DETAILS OF THE REPORT

3.1 The Housing Development Capital Programme is based upon the HRA Business Plan. This includes setting the parameters for capital expenditure on existing and new stock within the HRA, which covers what can be borrowed in addition to the use of capital receipts from land and building sales or Right to Buy sales, grant and s.106. From time-to-time changes within the programme will be sought to allow for substitutions, increased costs, etc.

3.2 The HRA Business Plan represents a moment in time and normally is used to model a HRA capital programme at the time of budget setting. Within the last year, since last budget setting the Mayor subsequently reviewed the capital programme and removed/scaled back schemes across both housing and HRA capital, notably the 'Temporary Accommodation buy-back' (£15.2m) and Registered Provider Grant Scheme' (£14.1m) programmes which has freed up resource, largely capital receipts and RTB receipts that can now be used to fund the HRA pipeline. These receipts were either general fund housing or committed against other schemes which are no longer progressing/ have been scaled back. The borrowing capacity within the business plan remains the same but other forms of funding have been made available following the review of the capital programme.

3.3 The review of other capital schemes has identified available funding of £38.1m capital receipts and £35.1m of RTB receipts that are now available to be added to the Housing Development Capital Programme. The funding of the Housing Development Capital Programme will need to be closely monitored and reviewed to keep a pace with the changes to funding streams available to the council to fund the programme. This will largely be driven by additional funding the council will receive/generate over the coming months and years, including potential further GLA grants, S106 monies and RTB receipts. As additional funding is confirmed, the overall funding of the programme will need to be updated where required to ensure the council is applying its capital resources as efficiently as possible across the entire programme. The schemes listed below have hitherto been in the pipeline of future schemes i.e. those awaiting funding. Now that funding has been identified these can be brought forward and included in the programme.

Table 1.

Scheme	Ward and GF or HRA	Estimated Homes and mix	Capital Receipts (£m)	RTB Receipts (£m)	Total Budget (£m)
Ensign Youth Centre	Whitechapel - HRA	42 7x4, 14x3, 14x2, 7x1	12.600	8.400	21.000
White Horse Road	St. Dunstan's - HRA	15 5x4, 5x3, 1x2	4.980	3.320	8.300
Bradwell Street	Bethnal Green East - HRA	7 4x4, 2x3,1x1	1.800	1.200	3.000

91 Wapping Lane	St. Katharine's and Wapping – HRA	1 1x2	0.096	0.064	0.160
1a Solander Gdns	Shadwell - HRA	2 2x2	0.570	0.380	0.950
Total Costs		124	20.046	13.364	33.410
Unallocated Budget			38.109	35.114	73.223
Unallocated Budget Remaining			18.063	21.750	39.813

NB: All schemes will have a planning compliant mix of at least 50% social rent, and 50% Tower Hamlets Living Rent. Schemes will comply with planning policy for 10% wheelchair homes.

3.4.4 Ensign Youth Centre. The existing community use is subject to a lease which is in discussion between the Council and lessee. A resolution on this is required before development can commence. A significant increase in the current estimate of homes is being investigated through increased height.

3.4.5 White Horse Road is a site that has been considered for development but until now has not had funding available. It is now being brought forward for the provision of an estimated 15 homes.

3.4.6 Bradwell Street has to date been without funding and is now being brought forward for an estimated 6 homes with the new funding available.

3.4.7 91a Wapping Lane. This scheme was approved by Cabinet in November 2021 but now needs its budget included in the capital programme.

3.4.8 1a Solander The scheme is now for permanent homes and not TA so needs to be accounted for within the HRA.

3.4.9 Ashington House was temporarily removed from the programme in November 2022 to allow for other more progressed schemes to be funded instead, as at the time a scheme was not suitably advanced. The block was considered as a redevelopment site however due to the lack of increase in affordable homes that could be developed it is now considered for refurbishment. Survey work has been undertaken that will form the basis for significant major works and improvement to block. This will require further detailed consideration to determine the most appropriate asset management route. This scheme will become part of the major works capital programme and not the housing development programme. A scheme proposal will be brought forward in due course.

3.4.10 Other schemes within the Council's pipeline will be worked up included as appropriate within the capital programme following consultation with the Mayor as set out in recommendation 4.

Table 2. Examples of schemes currently under consideration:

Scheme	Ward and GF or HRA	Estimated Homes
Whitechapel Sports Centre	Whitechapel - GF	20 - 72
John McDougall Park Property	Island Gardens - GF	20
Christian Street	Whitechapel - HRA	2
Pigott Street	Mile End - HRA	6
Lark Road	Bethnal Green West - HRA	5
Cubitt Town Library flat	Blackwall and Cubitt Town - GF	1
New build acquisitions from developers	Various	10 - 20
John Orwell	St. Katharine's and Wapping - GF	tba
Total No. of homes		64 - 126

3.5 There are some schemes in the current programme that need amendments made to their budgets. The report seeks approval for this from the additional capital funding and HRA borrowing. All schemes have been affected by increasing costs and where original costs estimates were made or budgets allocated a while ago, or those coming to site or procurement of contractors now need budgets to reflect this. Other sites have experienced on site difficulties e.g. contractors experiencing labour and materials shortages, and in one case a main contractor going into liquidation. These sites are detailed in the table below. This also includes additional requests for Albert Jacob House was included in the capital programme in November 2022. The element for which budget is now requested is for additional rooftops to be added to the scheme. The Montefiore Centre is also already in the capital programme and this addition will allow for rooftop development to be added to the main scheme, which includes improvements to the existing community facility.

3.6 All schemes in the current programme that are not yet on site, or have revised planning applications, are under review to maximise the number of homes achievable and will increase the number of units in the programme.

Table 3

Scheme	Approved Budget	Additional Budget Required			Reason
		Capital Receipts (£m)	RTB Receipts (£m)	Total (£m)	
Albert Jacob House – rooftop extensions	10.200	2.700	£1.800m	£4.500m	Increase in scope and size of original scheme of 26 with 10 additional homes.
Montefiore Centre – rooftop extensions	2.500	2.700	1.800	4.500	Increase in scope and size of original scheme of 4 homes with 10 additional homes.
St Paul's	13.235	0.802	0.300	1.102	During construction significant redesign M&E required to flue, bespoke Project 120 works and bin stores. This added delays and additional cost. Additional resource has been required to assist in on-site delivery management.
Lowder House	7.286	0.180	0.120	0.300	Gas connection delays and resultant loss and expense, works costs increased due to redesign of bespoke Project 120 units and bin stores. Additional resource has been required to assist in on-site delivery management.
Vawdrey	1.900	0.420	0.280	0.700	Since the original budget was approved based on a pre-tender estimate in June 2021 costs have increased significantly. In addition, delay to start on site resulted from right of way mitigations and a change required by UKPN to move a sub-station.
Rushmead	2.300	2.400	1.600	4.000	The original scheme of 5 houses is now to be submitted for a new application of nine flats. The last cost estimate was February 2022. There is an increase in size and design of development as well as significant inflation since original approval.
Buckhurst	2.500	0.750	0.500	1.250	The original estimate that obtained approval has been superseded as new costings were obtained following detailed

					design work. Inflation has added significant cost.
Edward Mann	7.239	3.061	-	3.061	The original budget was set in February 2022. Since then inflation and an additional three units in the scheme have increased costs requiring a new budget to reflect this.
Blackwall Reach	20.300	0.300	-	0.300	Realignment of existing capital receipts received to this cost centre to cover additional programme activity, resettlement and legal costs due to delays in completion of phase 2.
Total	67.460	13.313	6.400	19.713	
Unallocated Budget		18.063	21.750	39.813	
Unallocated Budget Remaining		4.750	15.350	20.100	

3.6 To assist the delivery of this increase in the programme and additional sites through the Development Agreement route an increase in staff resources is sought.

3.6.1 Additions sought to the Housing Regeneration team of three new posts, re-alignment of a role and one-year short term cover while recruitment. Key to ensuring delivery is enhanced resource within Legal and Procurement services to help deal with tendering and issuing of contracts. This is estimated at three posts on fixed term contracts.

3.6.2 The estimated cost of these staff resources is £506k in the first year and reducing in future years after tenders and contracts have been completed.

4 EQUALITIES IMPLICATIONS

4.1 The Equality Act 2010 requires the Council, in the exercise of its functions to have due regard to eliminate unlawful discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not.

4.2 With the diversity and rapid growth of the borough, ensuring equality is embedded throughout Council plans, services and activities is a key priority and at the heart of all decision making. To help meet its duty under the Equality Act the Council undertakes equality impact assessments to analyse a proposed change to assess whether it has a disproportionate impact on persons who share a protected characteristic.

4.3 As part of the process of establishing a housing capital programme, an equality impact assessment checklist is carried out on all new proposals and schemes

to determine if a full equality impact assessment needs to be carried out. Full equality impact assessments are carried out for each new build scheme as part of the governance process. This process prevents any proposal which amounts to discrimination from being implemented and any project which is likely to lead to a differential impact is varied to mitigate the differential impact.

- 4.4 It is intended that the housing capital programme, as a whole, reduces inequality, fosters cohesion and has a positive impact for residents and organisations in the borough.

5 OTHER STATUTORY IMPLICATIONS

- 5.1 Under Section 17 of the Crime and Disorder Act 1998, the council is under a legal duty when exercising its various duties to have 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 behaviour adversely affecting the local environment and quality of life of residents; the misuse of drugs, alcohol and other substances and re-offending. It is anticipated that a number of the capital schemes proposed will have beneficial consequences for crime and disorder in the borough through providing new and improved homes, enhancing the public realm and improving life chances for children and young people.
- 5.2 Any safeguarding implications of individual proposals in the budget are set out in the papers relating to those proposals.

6 COMMENTS OF THE CHIEF FINANCE OFFICER

- 6.1 This report recommends that Cabinet approve the increased budget of £73.223m to the Housing Development Capital programme, where £33.4m relates to new housing development schemes, and £19.7m relates to growth required to budgets for existing approved housing schemes and £20.1m is available for allocation as set out in recommendation 4.
- 6.2 The total estimated costs of the new housing development schemes of £33.4m, which will be financed from a combination of capital receipts (£20.0m) and Right to Buy Receipts (£13.4m). These funds are currently available for allocation to the housing development programme, hence deemed affordable to the HRA as a whole. The estimated cost and funding for each new housing development schemes is further detailed in Table 1 above.
- 6.3 The total estimated costs of growth required to budgets for existing approved housing schemes is £19.7m, which will be financed from a combination of capital receipts (£13.3m) and Right to Buy Receipts (£6.4m). These funds are also currently available for allocation to the housing development programme, hence also deemed affordable to the HRA as a whole. The estimated cost and funding for growth required to each existing approving housing scheme is further detailed in Table 3 above.

- 6.5 If the total request of £53.1m for new housing development and growth to existing housing scheme budgets are approved, the councils unallocated HRA capital receipt and Right to Buy receipt balances will reduce to £20.1m, which will be available to finance future additional schemes or changes to the programme.
- 6.6 It is important that costs of the housing development schemes and the programme as a whole are closely monitored to ensure they are contained within approved budgets to ensure the overall affordability of the HRA as a whole.
- 6.7 Para.3.6.1. and 3.6.2 identifies additional resources that will be required to deliver this capital programme. These resources have an estimated cost of £506k and will be funded within the HRA. The detailed work undertaken within each role will require scoping to identify how much of these posts can be capitalised. Any costs that cannot be capitalised will be met from HRA revenue, for which there is no budgetary provision. There will therefore either need to be mitigating savings or growth within the HRA to fund these posts.

7 COMMENTS OF LEGAL SERVICES

- 7.1 The Council must comply with the conditions under which the various funds were received for example, the restrictions relating to the use of the funds stated in the relevant S.106 agreement. The Council will need to comply with the rules relating to retained right to buy receipts and their use for replacement supply which can be found in the amended guidance issued by the Government in late June this year.
- 7.2 The ability to spend any of the sums detailed in this report will be subject to separate delegation.

Linked Reports, Appendices and Background Documents

Linked Report

- None

Appendices

- Appendix 1 Existing Programme
- Appendix 2 - Planning Statistics from the GLA on comparative housing completions between 2019 and 2022

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

- NONE.

Officer contact details for documents:

N/A

Appendix 1 Existing Programme

Site	Ward	No. & Mix of Homes	Status	Completion Due
<i>40 homes have already completed homes in 2023/24</i>				
Barnsley	Bethnal Green West	53 1x5, 5x4, 16x3, 8x2, 23x1	On site	Oct 23
Strahan	Bow West	9 5x3, 3x2, 1x1	On site	Nov 23
Lowder	Wapping	18 6x3, 5x2, 7x1	On site	Oct 23
St.Paul's	Mile End	23 7x3, 7x2, 9x1	On site	Jan 24
Mellish Street	Canary Wharf	22 5x3, 8x2, 9x1	On site	Dec 23
Shetland Road	Bow East	19 3x4, 4x3, 3x2, 9x1	On site	Dec 23
Norman Grove	Bow West	24 2x4, 3x3, 5x2, 7x1, 7x bedspaces	On site	Apr 24
Landon Walk	Poplar	16 9x3, 7x2	On site	Mar 24
Heylyn Square	Bow West	32 7x3, 6x2, 19x1	On site	Oct 24
Bancroft/Wickford	Bethnal Green East	33 6x4, 8x3, 7x2, 12x1	On site	Jan 25
Arnold Road	Bromley North	62 12x4, 20x3, 14x2, 16x1	On site	Jan 25
Sewardstone Road	Bethnal Green West	4 4x bedspaces	On site	Oct 23
Alfred Street	Bow West	4 3x4, 1x2	On site	Jun 24
Walter Terrace	Stepney Green	4 4x4	On site	Jun 24
<i>Sub Total</i>		323		
Brunton Wharf	St Dunstan's	32 6x4, 9x3, 9x2, 8x2	In tendering	Apr 26

Vawdrey Close	Bethnal Green East	4 4x4	In tendering	Jul 25
O'Brien Garages	Bethnal Green East	10 3x4, 2x3, 3x2 2x1	In tendering	Sep 25
Sub Total		46		
Buckhurst Street	Bethnal Green West	6 6x4	Planning Obtained	Aug 25
Edward Mann Close	Shadwell	22 7x3, 7x2, 8x1	Planning Obtained	Apr 26
Sub Total		28		
Smithy Street	Stepney Green	8 7x4, 1x2	Planning Submitted	Feb 26
Buxton Street	Spitalfields and Banglatown	4 4x4	Planning Submitted	Aug 25
Sub Total		12		
Schemes in design or redesign				
			Comment	Completion Date
Candy Street	Bow	24 9x3, 15x2	In pre-application to increase number of homes from earlier approval for 16 units	Jun 25
HAP	Stepney Green	180 affordable 33x4, 82x3, 44x2, 21x1 232 Market 27x3, 119x2, 27x1	New application required as mosque is re-located in scheme. Scheme to be considered for additional height.	2026-2029
Rushmead	Bethnal Green West	9 8x2, 1x2	New application to increase on previous approval for 5 homes.	Sep 25
Montefiore (existing)	Spitalfields and Banglatown	4 1x4, 3x2	See above. Includes community use	Sep 25
Albert Jacob House (existing)	Bow East	26 4x4, 6x3, 13x2, 3x1	See above. Includes g/f retail.	Apr 26
O'Leary rooftops	Stepney Green	32 3x2, 29x1	In pre-application	2026


Tomlinson rooftops	Weavers	14 14x1	In pre-application	2026
Cressy Place	Stepney Green	31 10x4, 9x3, 11x2, 1x1	In pre-application to increase on previous scheme of 22 homes.	Apr 26
Caxton Place	Bow West	36 5x4, 9x3, 16x2, 6x1	Additional storeys under consideration to increase scheme to 36 from 30	May 26
Copenhagen	Mile End	14 1x4, 11x3, 2x1	Sunlight/daylight under review to increase existing number of homes	Nov 26
St. George's	Shadwell	27 tbc	Architects appointed	May 26
Sub Total		629		
Total		1010		

40 homes have already completed in 23-24

Appendix 2 - Planning Statistics from the GLA on comparative housing completions between 2019 and 2022

	2019-2020	2020-2021	2021-2022	Total (3 Years)
London	7,439	5,304	8,750	21,493
Tower Hamlets	994	495	996	2,485 (11% of London's Total)
Newham	741	603	595	1,939
Hackney	128	185	55	368

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Cabinet September 2023	 TOWER HAMLETS
Draft Report of: Simon Baxter – Interim Director Public Realm	Classification: Unrestricted
Liveable Streets Bethnal Green Consultation outcome and measures	

Lead Member	Cllr Kabir Hussain, Cabinet Member for Environment and the Climate Emergency
Originating Officer(s)	Ashraf Ali, Service Head, Highways & Transportation (Interim)
Wards affected	Weavers and Bethnal Green West
Key Decision?	Yes
Forward Plan Notice Published	12/08/2022
Reason for Key Decision	Significant impact on wards
Strategic Plan Priority Outcome	7. Working towards a clean and green future

Executive Summary

On Wednesday 30 October 2019 Cabinet approved the Liveable Streets programme, governance and delivery plan for 17 project areas. Seven projects were started and two of there were completed (Wapping and Barkentine).

The Bethnal Green Liveable Streets scheme was approved in 2020 and was implemented in phases. The scheme remains around 80% complete due to a review of the scheme in September 2021 where the final elements of the scheme were delayed and never implemented.

The scheme has delivered on some of its key objectives by reducing some traffic levels and improving parts of Bethnal Greens public realm in a way that makes it safer for walking and cycling.

However, feedback received by the council shows there have also been a series of adverse impacts including access for people reliant on vehicle use for services such as medical appointments as well as access to families and support network. There has also been hindered access for emergency access vehicles particularly around Arnold Circus and Old Bethnal Green Road. Data also shows that there has also been an impact on some local bus services, and of displaced traffic on surrounding roads and streets.

The council has undertaken engagement with key stakeholders and a public consultation and gathered responses and developed options which seeks to address various issues and concerns which have been identified.

The reports set seeks approval for one of the options presented.

Recommendations:

For the reasons set out in this report, and having regard to the Council's public sector equality duty The Mayor in Cabinet is recommended to:

1. Receive and conscientiously consider the results of the engagement to date and two public consultations held in Weavers and Old Bethnal Green Road.
2. To approve one of the three options summarised in section 2 of this report.
3. Note that the Appendix F - EqIA identifies a number of positive and negative impacts of the options upon individuals that share particular protected characteristics (summarised in paragraphs 4.1 – 4.5 of this report).
4. Approve any changes to be implemented through experimental traffic orders so that amendments can be made to mitigate any adverse impacts that are identified through monitoring.
5. Approve a 12-month review of traffic flows and air quality to assess the impact of the proposals for the purposes of identifying any negative impacts and developing mitigation measures.
6. Approve the use of existing frameworks or term contracts to award an order up to the value determined for completion of the works.

1 REASONS FOR THE DECISIONS

- 1.1 The options set out in this report seek to address several issues that have been identified by residents and key stakeholders since the implementation of the Liveable Streets scheme in Bethnal Green.

2 ALTERNATIVE OPTIONS

- 2.1 Through the public consultation, responses and feedback from the public and key stakeholders was assessed by the project team. The review, assessment and available data have contributed to the development of an additional option to the two that were originally consulted on.

Summary of the options

- 2.2 Below is a summary of each of the options under consideration in this report. Plans relating to each Option are provided in Appendix A - Option scheme plans:

Option 1: This is the scheme that was referred to as Option 1 in the public consultation.

Old Bethnal Green Road

- Removal of closure on Punderson's Gardens.
- Removal of closure on Teesdale Street.
- Removal of closure on Old Bethnal Green Road.
- Removal of closure on Clarkson Street.
- Removal of closure on Canrobert Street.
- Removal of closures on Pollard Street and Pollard Row.
- Making Old Bethnal Green Rd two way between Pollard Row & Clarkson Street.

Columbia Road Area

- The removal of the closure on the junction of Columbia Road and Gosset Street and allowing southbound traffic only (amended to allow northbound emergency vehicle access).
- The removal of closures on Quilter Street and the junction of Wellington Row and Barnet Grove.
- Wellington Row would be one way westbound from the junction of Delta Street to the junction with Gosset Street.
- Wellington Row would be one way eastbound from the junction of Delta Street to the junction with Durant Street.
- Barnet Grove one way southbound between the junction of Elwin Street to the junction with Barnet Grove.
- Making one-way sections on Ravenscroft Street (between Ezra Street and Columbia Road) two way
- Making one-way section on Columbia Road (between Chambord Street and Ravenscroft Street) two-way.

Arnold Circus Area

- Removal of closures at each arm of Arnold Circus.
- Removal of Closure on the junction between Old Nichol Street.

A series of areawide improvements to the public realm to encourage active travel

- Option 1 includes plans to create a network of accessible walking routes across Bethnal Green. Creating this network would make it easier for residents to access important services including doctors' surgeries, shops and public transport.
- The council has identified a first phase of pedestrian improvements under consideration. Pedestrian improvements across the area will include:
 - a) New zebra crossings on Columbia Road, Gosset Street, Ravenscroft Street and Old Bethnal Green Road.
 - b) New continuous crossings across the area including where existing physical closures are removed.
 - c) Speed calming raised junctions at various locations across the area.

Option 2: Full retention of current scheme with all existing closures introduced by the scheme kept in place.

Option 3: This is an amended version of Option 1 which seeks to address concerns raised by key internal and external stakeholders and the public consultation. The differences are as follows:

Old Bethnal Green Area

- Keep closure on Canrobert Street
- Keep Old Bethnal Green Road one way between Pollard Row and Clarkson Street
- New camera filters on Old Bethnal Green Road junction with Temple Street to operate during peak times (with resident exemption)
- Widen footway on Old Bethnal Green Road between Mansford Street and Pollard Row
- New school street on Pollard Street

Columbia Road Area

- Keep one-way section on Ravenscroft Street (between Ezra Street and Columbia Road)
- New camera filter on Hackney Road junction with Ropley Street to operating Monday to Saturday. Only restricts non-exempt vehicles from turning in from Hackney Road into Ropley Street.

Arnold Circus Area

- Four new camera filters on Old Nichol Street and Arnold Circus junction with Calvert Avenue, Navarre Street and Hocker Street restricting night-time non-resident through traffic and associated ASB. s

3 DETAILS OF THE REPORT

Engagement and consultation

- 3.1 A public consultation exercise was carried out from 23 January until Sunday 12 February 2023. Consultation packs were delivered to over 10,000 residential and business addresses within the Old Bethnal Green and Weavers consultation areas (6000 in the area around Old Bethnal Green Road and 4000 around Weavers), with extra copies available on request. Over 4300 responses were received for both consultations and over 1800 of these were from within the scheme areas (had an internal postcode and used the resident reference code sent in consultation packs)
- 3.2 Both consultations presented respondents with two options as well as a travel survey and scheme evaluation. The options were:
- Option 1: Remove the Liveable Streets closures and implement a series of areawide improvements to the public realm to encourage active travel.

- Option 2: Retain the current scheme.
- 3.3 Emails were also sent to key stakeholders such as local schools, Transport for London and the emergency services. Emails were also sent to internal and external stakeholders on the Tower Hamlets mailing list during the consultation period.
- 3.4 Throughout the engagement period, we met with the emergency services, Transport for London, internal council departments and reached out to schools. One school allowed a Liveable Streets team member to present the proposals in one of the school's parents coffee meetings. Feedback was collected from this meeting to inform the some of the proposals in this report.
- 3.5 The following groups were also asked to provide their comments on the consultation:
- Accessible Transport Forum
 - Ethnic Minority Network
 - The Disabled People's network
 - Interfaith Forum
 - LGBT+ Community Forum
 - Older People's Reference Group
 - Women's Network

Consultation Feedback

- 3.6 Analysis has been undertaken on all feedback regarding the scheme.

Stakeholder feedback

- 3.7 External stakeholder engagement including but not limited to the emergency services, utility companies, local schools, Transport for London and local businesses.
- 3.8 Internal stakeholder feedback from council services including the network management, clean and green and highways maintenance teams.

Emergency service response logs

- 3.9 Since the implementation of the Liveable Streets scheme, there have been multiple incidents across the area where closures have hindered ambulance service and fire brigade access.
- 3.10 Certain adaptations have been made where removable bollards have been installed replacing permanent closures. However, these are only accessible by the London Fire Brigade using a special key. Access issues remain for ambulances.
- 3.11 Access issues for emergency vehicles remain around Arnold Circus and Old Bethnal Green Road due to the use of physical closures around these locations.

3.12 The three emergency services were consulted on the proposals and summaries of their response are provided below.

3.13 *London Ambulance service response:* There was support for the following elements of the proposals:

- Support the removal of hard closures on Teasdale Street, Canrobert Street, Clarkson Street and Punderson's Gardens –as allows for unhindered emergency access/egress
- Support the reopening of Old Bethnal Green Road –aids access and egress into the area.
- Support the removal of point closures on Arnold Circus to improve access and egress for emergency vehicles.
- Pollard Street one way –no concerns as road is very narrow and unlikely to be used by ambulance crews

3.14 The London Ambulance Service raised the following concerns:

- Making of Pollard Row one-way system southbound at Pollard Street could potentially lead to delays as crews divert around the one way system.
- Making the closure on Gossett Street/ Columbia Road junction: one way southbound only would restrict egress from the area significantly for emergency vehicles with only one northbound egress route via Barnet Grove being available.

Officer comment: These concerns have been addressed through Option 3 and amendments to Option 1 where northbound access for emergency service vehicles is not affected by the proposals.

- The proposed new one-way system on Wellington Row, Gossett Street, Delta Street seems confusing and means crews have to drive around long diversions to access addresses.

Officer comment: These concerns have been addressed through Option 3 and amendments to Option 1 where northbound access for emergency service vehicles is not affected by the proposals.

3.15 *Metropolitan Police response is set out below:*

- The MPS Road Safety Engineering Unit would urge LBTH to retain as much of the LTN infrastructure as possible in these areas. The reduction in ASB in the Arnold Circus area is noticeable and evidence from low traffic neighbourhoods elsewhere that have been allowed to 'mature' is that they show a marked reduction in road traffic collisions due to the fewer motor vehicles travelling through the area. In London, 80%

of those killed are vulnerable road users and the vast majority (circa 96%) are killed by motor vehicles.

3.16 LFB response:

- London Fire Brigade (LFB) wish to highlight the importance of our emergency service response being considered in all road network planning. LFB's Community Risk Management Plan (CRMP), which is approved by the Mayor of London, commits the Brigade to getting the first fire engine to an incident within a London wide average of six minutes and a second fire engine in eight minutes. We are keen to ensure the proposed changes do not impact on LFB's ability to meet those commitments. LFB has strict attendance times which are monitored closely. It is imperative that any works like this has minimal impact on our emergency response.

3.17 TfL have responded to each Bethnal green scheme separately.

Old Bethnal Green Road:

- TfL believe the benefits of the LTN, particularly the improvements made to safety through the delivery of good quality walking and cycling infrastructure, are complementary to our bus network. While we acknowledge the concerns raised about potential negative impacts on bus journey times, in line with our Vision Zero approach to road danger we firmly support retention of the LTN on Old Bethnal Green Road (Option 2) to promote active travel and reduce road danger, traffic congestion and air pollution in the area.
- TfL offered both funding and resources to progress further bus priority measures on Hackney Road, to address any impacts caused by the LTN. These measures would improve the efficiency and effectiveness of the bus network, especially for bus passengers who may not have access to, or the ability to use, other modes of transport.

Weavers including Arnold Circus:

- The removal of the Columbia Road/Gosset Street LTN would have a significant negative impact on safety and beneficial active travel by allowing through traffic and by removing the high-quality, pedestrian-friendly urban realm area created outside the Birdcage pub. This LTN is particularly beneficial during the hours that Columbia Road market is in operation, when the area sees significant numbers of pedestrians – many of them families with young children. The road closures in this LTN have created a safer route for cyclists, including those using the signposted cycle route known as Quietway For these reasons, we strongly oppose the removal of this LTN.
- The planters on Arnold Circus have successfully reduced traffic levels and prioritised safety for walking and cycling, while creating some operational issues for buses. We note the positive impact of the restrictions on both local crime and antisocial behaviour, creating a more pleasant environment for local residents, particularly women and girls. If transport officers conclude the planters are not a long-term solution, we would like to offer further funding and engineering support to create urban realm enhancements that retain the traffic

restrictions, work better for buses and emergency vehicles, and are acceptable to local stakeholders. Removing the current traffic restrictions is not supported by TfL.

Oaklands Secondary School response

- 3.18 Below is a list of points summarising the response from Oakland Secondary School which supported Option 2 and objected to Option 1. Their full response is included in Appendices A and B (Old Bethnal Green Road Area Consultation Report and Weavers Consultation Report).
- Prior to the implementation of traffic filters and one way systems, Mansford Street and Old Bethnal Green Road were roads suffering from traffic, noise and air pollution. The two-way traffic on Mansford Street was a major safety issue both at that start and end of school.
 - Oaklands School has recently become a split site school to accommodate its expanded roll. the development plans are completed, there will be upwards of 600 students a day walking up and down Old Bethnal Green Road. The changes between Mansford Street and Temple Street have already dramatically improved both the safety and, physical and mental wellbeing of these students who go to this school.

Lawdale Primary School response

- 3.19 Lawdale's response supported option 2 as it was considered safer for walking and cycling.

Response from Tower Hamlets Council Public Health Team

- 3.20 Public Health recognises the importance of improving the look and feel of public spaces in neighbourhoods across the borough, to make it easier, safer and more convenient to get around by foot, bike and public transport, as well as to take steps to reduce pollution. The full response from Public Health is included in Appendices B and C (Old Bethnal Green Road Area Consultation Report and Weavers Consultation Report).

Response from passenger services

- 3.21 The council's passenger services team runs 53 bus routes daily Monday to Friday carrying 734 passengers to and from 16 schools, nurseries and 4 day centres. Any removal of road closures in the Bethnal Green area is likely to help improve logistics, although keeping other traffic off road and giving priority to our buses (that should be exempt) would help improve journey times.

- 3.22 We currently we operate pick up and drop off from agreed collection points but are considering options for delivering back to door-to-door collections. The removal of road closures will be useful in facilitating these collections if implemented.

Response from Tower Hamlets Waste collection

- 3.23 The Waste services have reviewed the re-opening of the various schemes detailed above. The consensus amongst staff is that there is support to re-open all the schemes to allow easier passage of vehicles cleaning streets and making waste collections, avoiding the need to reverse long distance that breach H&S regulations.
- 3.24 Road closures hinder service delivery and increases perceived missed collections where areas become inaccessible. Waste services recommends that all road closures are lifted where practical and where there are challenges, ANPR is used as an alternative with service vehicles offered exemptions. Where streets are to be changed to one-way streets, access considerations must be considered and factored into the changes.

Response from Tower Hamlets Network Management Team (Regulatory Function)

- 3.25 The role of the Network Management Group, apart from coordinating works and activities on the Council's highways, is also to hold the charge of the Traffic Manager whilst satisfying the Network Management duty which is a statutory responsibility.
- 3.26 The responsibility of the team is to request information and asses the proposed schemes and works that will have an impact on the resiliency of the network. The Network Manager needs to be satisfied that network resilience is maintained and that there is efficient and expeditious movement of traffic, as far as possible, on our road network.
- 3.27 The Network Management team would support the removal of Liveable Streets schemes across the borough. Returning to a baseline traffic configuration will immediately alleviate negative post scheme impacts. This will allow the council to review a more considerate approach in the future with assessment that really take all stakeholders/data/assessment concerns into account before moving forward. The implementation of Option 1 will improve the resilience of the road network as well as improve the access for utilities to maintain essential services including limiting the additional financial burden if the scheme was to remain as is.

Response from Tower Hamlets Highways Asset Management Team

- 3.28 **Arnold Circus** - Proposal to remove all LTN scheme. Highways Asset Management supports this proposal.
- 3.29 **Columbia Road** – Highways Asset Management does not support this proposal to only reinstate a northbound Gossett Street and Columbia Road.

- 3.30 The issue of network redundancy on the proposed remaining route into this area has caused maintenance issues. Should maintenance be required where a closure is needed to facilitate repair works this would by default land lock residents in the area or with the suspensions of one way working (hazardous) put in place a lengthy and time onerous diversion route for residents and business. This issue has a financial impact on the Maintenance Annual Budget as a small repair which would normally require minimal traffic management may now require a road closure each time a defect appears. I would suggest this location is reinstated back to its layout prior to the Liveable Streets Scheme.
- 3.31 **Old Bethnal Green Road** – The proposal to leave the layout as a one way street does cause maintenance issues with regards to winter maintenance gritting, carriageway defects, street lighting maintenance, and surface water gully cleansing. Vehicles required to attend to these activities will now require a road closure to be established and additional costs to maintenance team. I would request this layout be reinstated as per prior to the LTN scheme being installed.

Response from UK Power Networks (UKPN)

From a UKPN stance, we have raised numerous concerns about the LTNs that have come in across London. We are seeing concerns raised by Engineers who are being delayed from accessing assets such as Substations and Link Boxes due to the additional time it's taking to get to locations when having to detour or take a different route which are now heavier with displaced traffic.

One of our main focuses and drivers from Ofgem is restoration time to faults, we need to ensure we restore power to customers as quickly and as safely as we can – in some cases, as you know this could be a temporary measure, but this is usually carried out by switching the network via Link Boxes or local Substations, but requires Engineers on site to do so. Not being able to get to locations as swiftly as we previously could due to these LTNs has a knock on affect to our restoration times, which could also potentially put added risk to any scenario.

Consultation Feedback themes

- 3.32 Key themes from respondents supporting Option 1 included:
- Concerns from residents who rely on vehicle use for access to services such as medical appointments. There were also concerns from those reliant on carers who reached them by car. Many responses referenced reliance on Hackney Road to get in or out of the area as a particular issue causing significant increases in journey times and fuel costs.
 - Congestion and displaced traffic on other roads including some internal streets and parts of the network of boundary roads.
 - Access for the emergency services and council vehicles such as passenger services, highways and maintenance and waste collection.

- Impact on local businesses on Old Bethnal Green Road.
- Access to Highways and Utility services & highway assets

3.33 Key themes from respondents supporting Option 2 include:

- Road safety and air quality implications of pre-scheme traffic levels returning to the area.
- Removal of attractive public realm including wide pavements and planting on Old Bethnal Green Road.
- Concerns regarding the loss of the contra flow cycle lane between Temple Street and Mansford Street as a safer alternative to Bethnal Green Road and Hackney Road.
- Concerns of the costs of removal of public realm where significant financial investment has been made.

Public Consultation outcome

3.34 The results from the public consultations show the following:

Responses from within the scheme areas (Used resident reference code sent with consultation packs)

- For the Old Bethnal Green Road area, 41% (332) of residents from within the area supported Option 1 and 59% (442) supported option 2.
- For the Weavers area. 42% (332) of residents from within the area supported option 1 and 58% (454) supported option 2.

The full analysis of all the responses is in appendices. Based on the consultation responses received, overall the residents supported option 2.

3.35 The surveys also included a travel survey and scheme evaluation. Details regarding both is provided in Appendices B and C (Old Bethnal Green Road Area Consultation Report and Weavers Consultation Report).

3.36 As set out in both consultation reports, a significant number of paper copies were received which were photocopied duplicates and following consultation with the council's audit and legal teams, these duplicate paper copies have been discounted and are not included in the above figures.

Analysis of data

The council has collected data to assess the impacts of the Liveable Street programme in Bethnal Green. Collecting a baseline was not possible for some data sets making before and after comparisons impossible. This applies to cycle and pedestrian count data that was not collected before the scheme was implemented. However, the council has collected a sufficient level of data for an assessment of the scheme to be undertaken. The following data has been collected:

- Traffic volume
- Traffic congestion
- Bus journey time delays
- Air Quality (NOX)
- Collision Data
- Cycle counts
- Pedestrian Counts
- Emergency service response logs

Officers are satisfied that the data collated after approximately 24 months of operation of the scheme is sufficient to enable the benefits and disbenefits to be properly evaluated and understood so that informed decisions can be taken.

Internal Traffic volumes

- 3.37 Traffic counts were undertaken across the area before the scheme and in 2022. The tables below summarise the changes in traffic levels for various streets in the scheme area.

Road/Street	Direction	Change in traffic flows (2019-2022)	Direction	Change in traffic flows (2019-2022)
Ravenscroft Road	Northbound	-9%	Southbound	-48%
Horatio Street	Northbound	+70%	Southbound	+278%
Ropley Street	Northbound	+89%	Southbound	-11%
Temple Street	Northbound	-28%	Southbound	-76%
B118 Old Bethnal Green Road	Eastbound	-86%	Westbound	-70%
B108 Warner Place	Northbound	+12%	Southbound	-9%
B108 Squirries Street	Northbound	-16%	Southbound	-24%
Columbia Road	Northbound	+18%	Southbound	-43%
B118 Columbia Road	Eastbound	-53%	Westbound	-59%
Virginia Road	Eastbound	55%	Westbound	20%
Swanfield Street (North)	Northbound	209%	Southbound	80%

- 3.38 Traffic count data from 2019 and 2022 shows reductions and increases in traffic flows at various locations across Bethnal Green.

- 3.39 Traffic has reduced significantly on Old Bethnal Green Road which saw an 86% (3012 vehicles) reduction in eastbound flows and 70% (3424 vehicles) reduction in westbound flows. The western end of Columbia Road also saw a significant reduction in traffic of 53% (2324 vehicles) in the eastbound and 59% (2483 vehicles) in the westbound. There were also reductions on other streets including Squirries Street, Temple Street and Ravenscroft Street.
- 3.40 There were however streets which saw increases in traffic. The most significant roads from this list are Swanfield Street and Virginia Road which saw northbound traffic flows increase 209% (960 vehicles) and 55% (248 vehicles) respectively. Smaller densely populated residential roads such as Horatio Street with 70% (202 vehicles) increase in the northbound direction and Ropley Street with 89% (493 vehicles) in the northbound direction. These are directly attributable to the closures of the junction of Gosset Street, Arnold Circus and Columbia Road.

Boundary traffic congestion

- 3.41 In the absence of pre scheme boundary road traffic counts, three sets of data were used to assess the impact of the scheme on boundary road congestion. These are:
- DfT travel time delay data
 - iBus delay data
 - TRL Astrid database data
- 3.42 Department of Transport data has been gathered for delay times on the main boundary roads of the scheme. The data shows a 60% increase in delays on Hackney Road from 2019 to 2021 and 13% increase in delays on Bethnal Green Road. These are significantly higher than delay increases on Whitechapel Road and Commercial Road, which are the two other east west A roads in the borough.
- 3.43 In 2018/19, the two bus routes serving Hackney Road provided over twelve million passenger journeys. iBus data shows an increase in bus journey times on Hackney Road and Bethnal Green Road between 2019 and 2021. The latest data for 2022 shows Bethnal Green Road bus journey times did increase in 2021 but they are now down to pre-closure levels except for the section east of Warner Place. This section of Hackney Road still sees an increase in congestion and bus journey times remains in 2022 and this is throughout the day.
- 3.44 TRL Astrid data is not from traffic counts but from detectors on traffic signals which calculate an approximate number of vehicles based on how long the detector is occupied. They can be at risk of inaccuracies during busy times when static vehicles but provide a useful comparison of data from before and after the implementation of the Liveable Streets scheme.
- 3.45 The council has obtained data for PM peak (4pm-7pm) data for the following three locations:

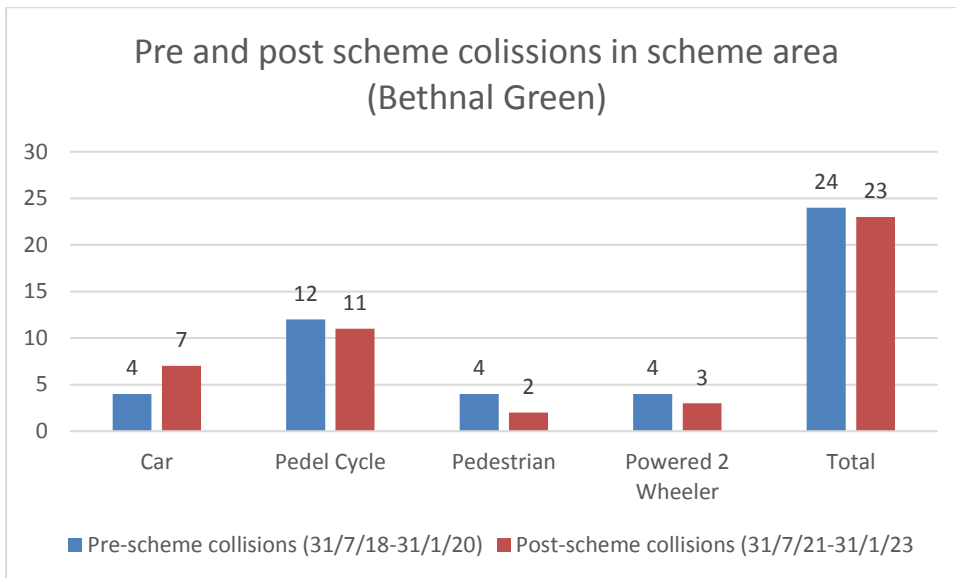
- *Hackney Road/Cambridge Heath Road*: Data shows a significant increase in traffic flows with all flows below 5000 in early 2020 compared to nearly all flows close to or exceeding 6000.
- *Hackney Road/Queensbridge Road*: February 2020 flows were concentrated around 2000 in February. These flows were more concentrated around the 2500 level in February 2022.
- *Bethnal Green Road/Vallance Road*: Traffic levels have largely remained the same with some negligible reduction.

Air quality

- 3.46 NO2 data from within the scheme and boundary roads was collected and compared with similar roads and streets in other parts of the borough. The data showed significant reductions between 2019 and 2022 across the borough, including the roads on the boundary and within Bethnal Green. The data is provided in more detail in Appendix H – Scheme Data.
- 3.47 Comparing the two sets of data, there is an indication that most of the reductions in NO2 emissions are due to ULEZ and cleaner vehicles as significant reductions in NO2 emissions have also occurred across the borough. But the slightly greater reduction in the scheme area can be attributed to the traffic reduction observed around each of the monitoring sites.
- 3.48 It is important to note that the monitoring stations in the scheme area are located where there have been significant reductions in traffic. There are no NO2 monitoring stations on Swanfield Road, Virginia Road or Horatio Street where there have been significant increases in traffic.

Collision Data

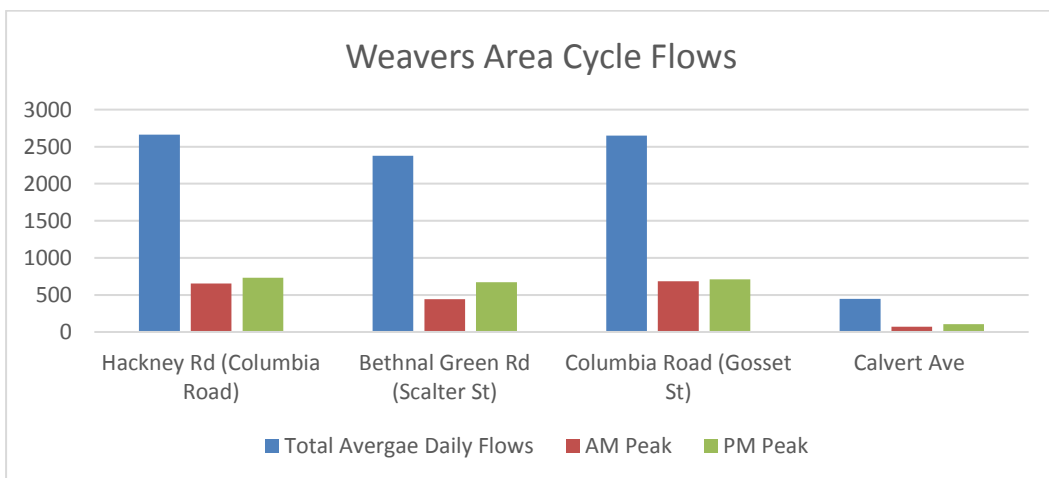
- 3.49 Collision data was gathered for 18-month periods before and after the implementation of the scheme. The dates for both periods were 31 July 2018 to 31 January 2020 and 31/ July 2021 to 31 January 2023.

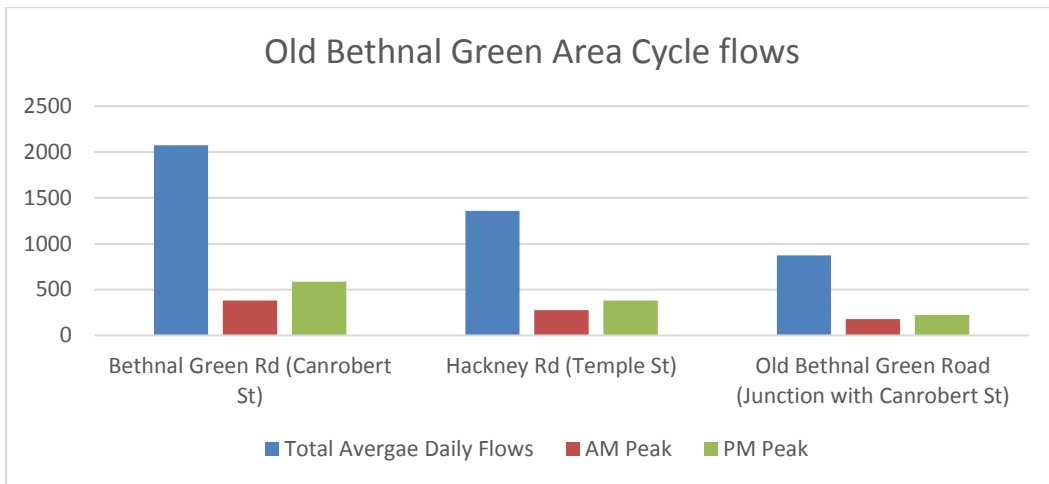


3.50 The data shows a reduction of one collision between the two periods. Collisions involving vulnerable road users (pedestrians and cyclists) reduced from 20 to 16.

Cycle Counts

3.51 Cycle counts were undertaken at various locations in the Old Bethnal Green and Weavers Areas on 8 and 9 February 2023. The tables below show the results of the cycle surveys in each area.





3.52 Cycle counts in Weavers show cycle flows to be much lower on Calvert Avenue than the parallel routes of Hackney Road, Columbia Road and Bethnal Green Road. This is despite the full closures to traffic around Arnold Circus. These parallel routes are likely to be favoured as more direct routes to and from the city.

3.53 Similarly, cycle counts on Old Bethnal Green Road are much lower than on the parallel routes on Hackney Road and Bethnal Green Road. This is despite these routes have much higher traffic levels and lacking cycle segregation. This may be due to these routes being more direct for journeys to and from the city than Old Bethnal Green Road. However, it is likely that the cycle route on Old Bethnal Green Road is a preferred option for local journeys and those being made by less confident cyclists.

Pedestrian Counts

3.54 Pedestrian counts were undertaken in the following areas on 8 and 9 February 2023:

- Calvert Avenue (junction with Arnold Circus)
- Columbia Road (junction with Gosset Street)
- Old Bethnal Green Road (junction with Canrobert Street)

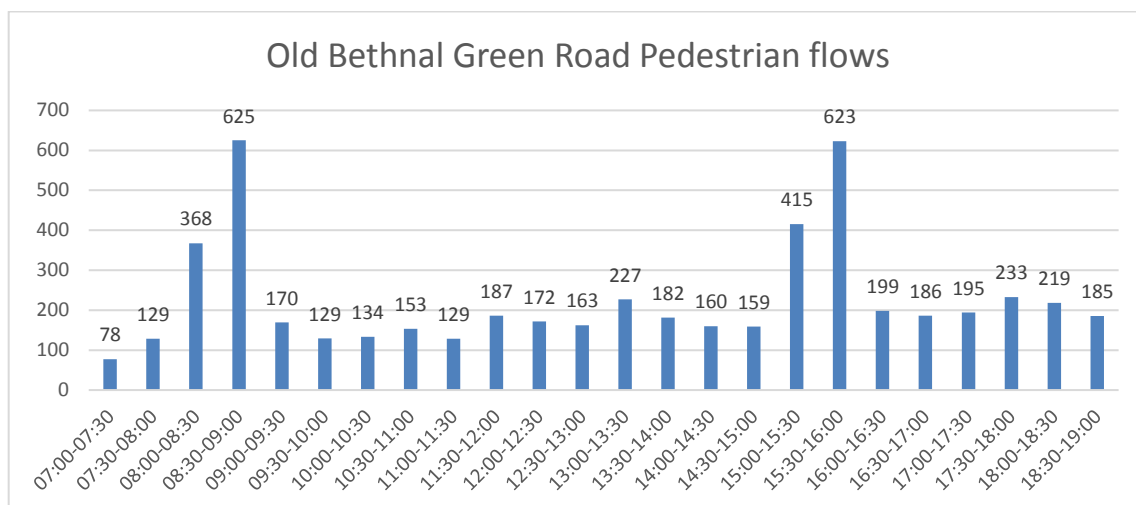
3.55 The table below show the results of the pedestrian surveys.

TIME	Old Bethnal Green Road	Gosset/ Columbia	Calvert Avenue/ Arnold Circus
Daily Total	5368	5007	2922
AM Total (7am-9am)	1197	1026	330
PM Total (5pm-7pm)	831	927	502

3.56 A comparison of the three areas shows Columbia Road and Old Bethnal Green Road to be much busier than Calvert Avenue in terms of pedestrian flows.

3.57 Further analysis has been undertaken to assess the peak pedestrian demand on Old Bethnal Green Road around the junction with Canrobert Street. The table

below shows significant pedestrian demand around school arrival and departure times.



The basis for developing an Option 3

3.58 Option 3 seeks to take a balanced approach to address responses received in the consultation, consideration of the data and the development of the Equalities Impact Assessment (EqIA) as set out in section 4 of this report.

Old Bethnal Green Road

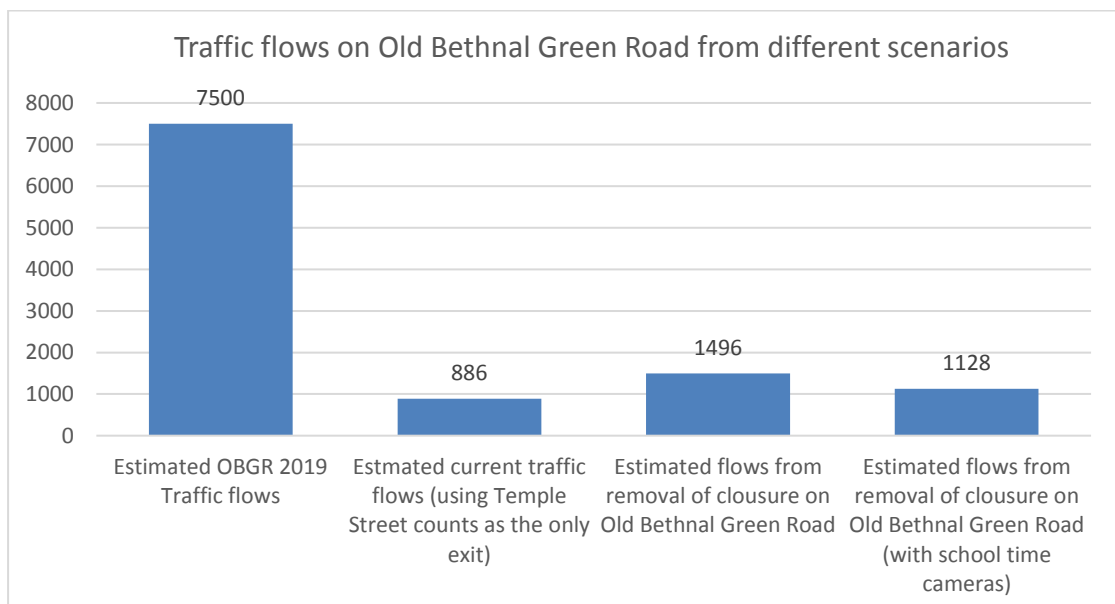
3.59 The proposals under Option 1 for Old Bethnal Road included removal of closures on Old Bethnal Green Road, Teesdale Street, Punderson’s Gardens, Canrobert Street and Clarkson Street.

3.60 Option 1 also included conversion of Old Bethnal Green Road to two-way operation which would have required narrowing of footways, removal of planting and removal of cycle lane on Old Bethnal Green. It would have also required the removal of the westbound cycle lane between Temple Street and Mansford Street.

3.61 Option 3 would involve the retention of the one-way operation of Old Bethnal Green between Temple Street and Pollard Row. The closure between Clarkson Street and Temple Street would be removed and be made two-way road to improve access to the area from the west for the emergency services and residents.

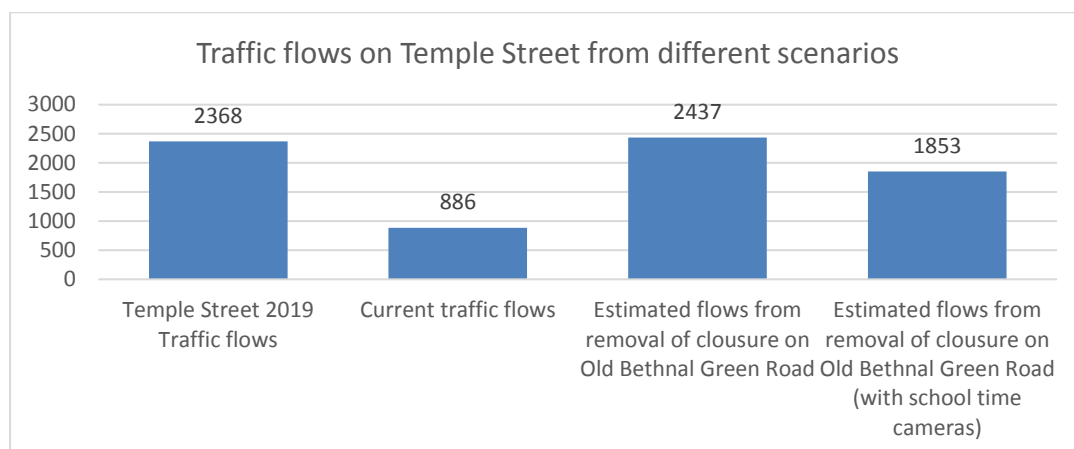
3.62 This arrangement would allow for the retention of most of the walking and cycling infrastructure that has been implemented through the scheme on Old Bethnal Green Road. This includes most of the widened footways, planting and the westbound contra-flow cycle route. Retaining the one-way section of Old Bethnal Green Road between Mansford Street and Pollard Row would also allow for the widening of the footway alongside Elizabeth Selby primary School. This would improve road safety on this section of the road where significant pedestrian crowding particularly at school pick up and drop off times. This issue was raised as a key safety concern from engagement with Elizabeth Selby Primary School.

- 3.63 Retaining the one-way operation of this section of Old Bethnal Green Road would continue to restrict the key east-west through traffic that existed before the scheme was implemented. This would mean that the removal of closures on Old Bethnal Green Road, Teesdale Street, Punderson's Gardens, and Clarkson Street would not result in the return to pre-scheme traffic levels that are of concern to many who responded to the consultation.
- 3.64 Removal of closures on Teesdale Street, Punderson's Gardens, and Clarkson Street would also improve network resilience in the area. Under the current arrangement there is only one way in (Mansford Street) and one way out (Temple Street) for much of the area. This lack of resilience means the area experiences significant issues with access or egress when there are either planned or unplanned events which require closures on either of these streets.
- 3.65 The removal of these closures would allow eastbound traffic on Hackney Road that is turning right at Cambridge Heath Road (southbound) to use Old Bethnal Green Road as a cut through. The council has undertaken turning count surveys at the junction of Hackney Road and Cambridge Heath Road. This data there is a potential for a maximum of 1496 vehicles between 6am and 10pm using Old Bethnal Green Road which is significantly lower than the estimated 7500 from before the scheme was implemented.
- 3.66 Given the feedback from local schools, Option 3 includes ANPR camera filters on the junction of Old Bethnal Green Road and Temple Street to operate during school pick up and drop off times. These would operate on weekdays between 8:00am and 9:30am and 3pm and 4:30pm. It is estimated the through traffic of 1496 eastbound vehicles would be reduced to 1128 through the use of timed ANPR cameras (with resident exemption).



- 3.67 The removal of the closures would also allow northbound traffic on Cambridge Heath Road that is turning left at Hackney Road (westbound) to use Temple Street as a cut through. The council has undertaken turning counts at the junction

of Hackney Road and Cambridge Heath Road to estimate how much traffic this is likely to be. The counts show this is likely to be 2437 vehicles between 6am and 10pm which are similar to the 2368 pre scheme traffic flows. It is estimated these flows would also be reduced to 1853 using timed ANPR cameras.



- 3.68 Option 3 would involve implementing these changes through an experimental traffic order so that changes can be made to mitigate any adverse impacts that are identified through monitoring.

Pollard Row and Pollard Street

- 3.69 The proposals under Option 1 for Pollard Row were to remove existing closures but implement southbound one-way operation up until the junction with Ively Street. The closure on Pollard Street would also be removed and would operate one-way eastbound until the junction with Pollard Street.
- 3.70 Concerns were raised by staff at Elizabeth Selby Primary School regarding the impact on road safety on Pollard Street. They considered this area unsafe due to the congregation of vehicles on Pollard Street near the southern school entrance during school drop off and pick up times.
- 3.71 Option 3 therefore includes a new school street installed on Pollard Street where vehicles not registered for exemption will not be permitted to enter between 8am – 9.30am and 3pm – 4:30pm on school days.
- 3.72 Feedback from the London Ambulance Service requested that that Pollard Row be made two-way to improve access. Pollard Row is made two-way between Old Bethnal Green Road and Ively Street through Option 3.

Columbia Road and Jesus Green

- 3.73 The proposals under Option 1 for Columbia Road included:
- The removal of closures on Quilter Street and the junction of Wellington Row and Barnet Grove.

- The removal of the closure on the junction of Columbia Road and Gosset Street and allowing southbound traffic only.
 - Making one-way sections on Columbia Road (between Chambord Street and Ravenscroft Street) and Ravenscroft Street (between Ezra Street and Columbia Road) two way.
- 3.74 They also include a new one-way system which would comprise of the following:
- Wellington Row would be one way westbound from the junction of Delta Street to the junction with Gosset Street.
 - Wellington Row would be one way eastbound from the junction of Delta Street to the junction with Durant Street.
 - Barnet Grove one way southbound between the junction of Elwin Street to the junction with Barnet Grove.
 - Columbia Road two-way between the junction with Chambord Street and Ravenscroft Street.
- 3.75 The London Ambulance Service raised concerns on the proposals in Option 1. These concerns related to the new one-way southbound arrangements on Barnet Grove and the Junction of Columbia Road and Gosset Street reducing northbound access for ambulances.
- 3.76 TfL raised concerns regarding the impact of increased traffic on the cycle quietway which runs along Columbia Road. Residents have also raised concerns for cycle safety at the junction with Ropley Street where southbound vehicles have poor visibility of oncoming cyclists. Cycle Count data shows significant cycle flows on Columbia Road particularly during morning and evening peak hours.
- 3.77 Option 3 would address these issues by restricting traffic in the area through:
- The restriction to through traffic turning into Ropley Street from Hackney Road (camera filter with resident exemptions operating Monday to Saturday to allow for market trader access)
 - Retention of the one-way northbound section of Ravenscroft Street (from Columbia Road to Ezra Street)
- 3.78 TfL also raised concerns on the impact of Option 1 on Columbia Road during the Sunday markets times. The proposals do not impact on the market operation as the section closed off to traffic would not change.
- 3.79 The following changes would therefore be made through Options 1 and 3:
- The junction of Columbia Road and Gosset Street to be re-designed to accommodate a northbound, emergency vehicle only lane to improve northbound emergency vehicle access.
 - Two-way operation on Barnet Grove is retained between Elwin Street and Gosset Street. To restrict northbound through traffic prohibitions to northbound traffic (except for emergency vehicles) would be installed on the junctions with

Wellington Row and Quilter Street. This will retain northbound emergency vehicle access.

- A six-day camera filter restricting non-resident vehicles from turning into Ropley Street from Hackney Road from Monday to Saturday. This will not apply on Sunday for market access. This will prevent through traffic and will reduce westbound vehicle traffic on Columbia Road benefitting Columbia Primary School and the cycle quietway.
- Retain one-way northbound operation of Ravencroft Street from Columbia Road to Esra Street.

3.80 Closures on Quilter Street and the junction of Wellington Row and Barnet Grove are also removed as part of Option 3.

Arnold Circus area

3.81 The proposals that were consulted on for Option 1 for Arnold Circus were for the following changes:

- Removal of closures at each arm of Arnold Circus
- Restoration of Arnold Circus as a roundabout
- Removal of Closure on the junction between Old Nichol Street and Boundary Street
- Two-way operation of Navarre Street
- Restoration of two-way operation of Calvert Avenue

3.82 The use of planters is not considered sustainable in the medium to long term given issue of their frequent illegal movement and the costs of maintaining them. TfL have objected to removal of the planters and have offered funding and engineering support to create urban realm enhancements that retain the traffic restrictions, work better for buses and emergency vehicles.

3.83 The current arrangement of planters has helped reduce traffic levels around Arnold Circus significantly. However, traffic data shows traffic levels on Swanfield Street have tripled from just over 1000 vehicles to over 3000 since the Liveable Streets closures were implemented. This is traffic that is displaced from the closure of Club Row and Arnold Circus. Swanfield Street and Virginia Road are residential roads with narrow footways and limited crossing options.

3.84 Cycle Count data (see paragraphs 3.54 -3.56 of this report) gathered by the council shows limited use of Arnold Circus by cyclists compared to the two parallel routes of Bethnal Green Road and Columbia Road. Traffic flow data shows how the scheme has diverted traffic from Arnold Circus to Swanfield Road, Virginia Road and then Columbia Road to leave the area in a northwest direction. This part of Columbia Road is a cycle Quietway and is well used by cyclists, more so than Arnold Circus and Calvert Avenue, despite the closure to traffic.

3.85 TfL have acknowledged that the closures have created some operational issues for buses. Before the Liveable Streets scheme was implemented buses were able to stand on Calvert Avenue and circumnavigate Arnold Circus back to their routes.

Drivers also had access to toilet facilities on Calvert Avenue which have now become disused. This is due to buses having to stand on Shoreditch High Street which has also presented congestion issues between bus routes.

- 3.86 Option 3 therefore includes the removal of Liveable Streets closures on Arnold Circus and Old Nichol Street on an experimental basis. The removal of closures on Arnold Circus would reduce traffic levels on Swanfield Street, Virginia Road and the western end of Columbia Road. This would improve road safety on these streets and significantly reduce traffic on the western end of Columbia Road which has a busy cycle quietway running along it.
- 3.87 Removal of the closures would also present operational benefits for bus services providing improved stand arrangements and toilet facilities for drivers.
- 3.88 There have been concerns raised by residents, TfL and the police regarding antisocial behaviour related to the nearby night-time economy. This feedback raises concerns regarding the return of this antisocial behaviour if the closures are removed.
- 3.89 To address these concerns, Option 3 includes ANPR cameras which are installed to address through traffic during the hours this antisocial behaviour was experienced before the scheme was implemented. These cameras will be installed in the following locations:
- Junction of Calvert Avenue and Arnold Circus
 - Junction of Navarre Street and Arnold Circus
 - Junction of Hocker Street and Arnold Circus
 - Junction of Boundary Street and Old Nichol Street
- 3.90 These cameras will be installed through an experimental traffic order and will initially restrict through traffic between 9pm and 5am 7 days week. This will allow the council to monitor the effectiveness of the times and locations of the restrictions and make changes if required. All Tower Hamlets residents would be eligible for exemption from these closures.

How Option 3 will address concerns raised through this consultation

- 3.91 Through Option 3, the benefits of the scheme are retained while addressing the impacts which have been identified. A strong theme emerging from the support for Option 2 was that the scheme was not perfect, and the Council should work towards improving it rather than complete removal. Option 3 retains most of the low traffic benefits of the scheme without the adverse impacts that have been caused by physical closures.
- **Majority of the reduction in traffic levels is retained:** The scheme was successful in reducing much of the east west through traffic in the area. The retention of the one-way operation of Old Bethnal Green Road restricting the east west through traffic would continue to limit through traffic. The busiest road in the area before the scheme was Old Bethnal Green Road (between Mansford Street and Pollard Row) where traffic counts measured

8315 vehicles trips in 2019. This reduced to 2739 in 2021 after the scheme was implemented. The amended scheme is not expected to result in any additional traffic at this point resulting from the removal of closures.

- The southbound only access on the junction of Columbia Road and Gosset Street would further restrict east-west through traffic by restricting westbound traffic. Traffic through this junction is expected to be reduced due to no direct route to Cambridge Heath Road due to the retention of the one-way system on Old Bethnal Green Road.
- **Road Safety:**
 - a. The road safety benefits of reduced traffic for much of the area will be retained.
 - b. The retention of the majority of the new public realm on Old Bethnal Green Road which includes wider footways, planting and a segregated cycle route.
 - c. An improvement to road safety will be made around Elizabeth Selby Primary School through the widening of the footway on Old Bethnal Green Road. This will also improve pedestrian safety for access to Lawdale Primary School and Oaklands Secondary School.
 - d. A new School Street will be implemented on Pollard Street improving safety around one of the main entrances for Elizabeth Selby School.
 - e. Traffic on Columbia Road next to Columbia Road Primary School will be reduced through the new camera filter on Ropley Street and new southbound access on the junction with Gosset Street.
 - f. A new zebra crossing will be installed on Ravenscroft Street close to one of the entrances of Columbia Primary School.
 - g. A new Copenhagen crossing will be installed with pedestrian priority where the closure is removed on Teesdale Street
 - h. Where the Old Bethnal Green Road closure is removed, a new zebra crossing will be installed as well as ANPR closures to be times around school times.
- **Air Quality:** The retention of much of the traffic reduction benefits of the scheme will extend to the air quality benefits.
- **Concerns around the removal walking and cycling infrastructure including planting to make way for increased space for vehicle traffic:** Much of the infrastructure around Old Bethnal Green is retained with further enhancements being made. This will allow children, parents, families, and staff to arrive and leave the school in a safe and healthy environment whilst encouraging more active travel. The removal of walking infrastructure is

limited to various junctions where access improvements are to be made. These include Teesdale Street, Clarkson Street, Punderson's Gardens and Gosset Street.

- **Cost of scheme:** The elements of the scheme where there has been significant investment in the public realm will be retained. These include the planting, cycle track and widened footways on Old Bethnal Green Road. Further investment will be made towards improvement footways on Old Bethnal; Green Road, a new school street and areawide accessibility improvements.
- **Emergency services access is improved:** Emergency vehicle access would be improved throughout the area through Option 3
- **Access for those reliant on car access:** Access for those reliant on vehicle use for access to services such as medical appointments will improve through Option 3.
- **Network resilience is improved:** Network resilience will be significantly improved through Option 3. Many parts of the scheme area including Jesus Green and the Mansford Estate are no longer reliant on Hackney Road for Access. Under the current traffic arrangements, access to and from the Mansford Estate is severely restricted if there are any planned or unplanned closures to Mansford Street or Temple Street.
- **Access to businesses on Old Bethnal Green Road:** We undertook direct engagement with the businesses on Old Bethnal Green Road on the proposals. Five of the six businesses stated they have seen a significant fall in trade since the closures were introduced. They all attributed this fall in trade to the lack of passing trade resulting from the closures.

Evaluating the Options

3.92 Appendix C sets out an evaluation exercise which has been undertaken which scores the options according to the following criteria:

- a) **Facilitating the passage of vehicle traffic:** The Traffic Management Act 2004 also places a duty on Local authorities to facilitate the passage of traffic. The council has a duty to coordinate street works while ensuring network resilience is maintained and that there is efficient and expeditious movement of traffic, as far as possible.
- b) **Facilitating the passage of vulnerable road users including pedestrians and cyclists:** The Traffic Management Act 2004 also places a duty on Local authorities to facilitate the passage of vulnerable road users. This includes the level of service from footways, crossings and cycle routes to meet the needs of demand in the area.

Statutory Guidance for the TMA 2004 (network management to support active travel) encourages measures to reallocate road space to people walking and

cycling. Measures highlighted in this guidance include installing cycle facilities, enabling walking and restricting access for motor vehicles at certain times. Local authorities have a statutory duty under section. 39 of the 1988 Road Traffic Act to take steps both to reduce and prevent accidents.

- c) **Local Access:** This includes access for emergency service vehicles, deliveries, and servicing for businesses. This also include the vehicles required for the council to fulfil various statutory functions including highways maintenance, passenger transport and waste collection.
- d) **Air Quality:** The council has presented data on the likely air quality impacts across of the Liveable Streets across the area. This evaluation will consider the likely impact of the different options on air quality by considering the estimated traffic levels and population densities across the area.
- e) **Financial cost:** This includes the cost of works to develop and implement the option. These costs include detailed design, traffic management and physical works.

3.93 All of the options are feasible and the evaluation in Appendix D – Options Evaluation, the available data and feedback received through the consultation are deemed sufficient to enable fair consideration between them.

3.94 A summary of the evaluation is:

- Option 1 scores strongest in terms of access for emergency services, residents, deliveries and vehicles associated with council operations such as highway maintenance and waste collection. It is also the strongest option in terms of network resilience and access for those reliant on vehicles such as disabled people. From the consultation, the proportion of responses disabled people were more in support of Option 1 than for Option 2. From disabled responses from within the consultation area 70.4% supported Option 1.
- Option 2 scores highest in terms of road safety, air quality and public realm suitable to encourage active travel.
- Option 3 scores highest overall by striking a balance between competing demands on streets within the scheme area. It seeks to address most of the concerns of stakeholders that support Options 1 and those that support Option 2.

4 EQUALITIES IMPLICATIONS

4.1 An Equalities Impact Assessment (EqIA) has been developed alongside the scheme development and consultation process. The initial EqIA assessment highlighted the potential for positive and negative impacts on groups sharing protected characteristics. Evidence has been gathered from existing studies, data sets, as well as data collected as part of the consultation.

- 4.2 Option 1 is feasible but there are concerns regarding the impacts of increase in traffic in the area. These impacts include reduced road safety and increased emissions from vehicle traffic. These impacts have a disproportionate impact on protected characteristics groups such as older people and younger children. The series of public realm improvements that are proposed seek to mitigate these concerns but the implementation of Option 3 is considered to be more effective in addressing them.
- 4.3 Option 3 would retain the benefits from the scheme for those who walk, cycle and use public transport across the area and improvements to the public realm. It would also address the identified negative impacts of the proposal that are related to those using a motor vehicle to use alternative routes to reach their destination in the area. These negative impacts are associated with the increased time, distance, and cost for those reliant on cars to access services. These negative impacts also apply to those reliant on car access for carers and support services.
- 4.4 Options 1 and 3 include a robust monitoring plan is developed to identify any negative impacts on protected characteristics groups resulting from the proposals. This should provide a mechanism for mitigation measures or alterations where necessary, following engagement with stakeholders.

5 OTHER STATUTORY IMPLICATIONS

- 5.1 Many of the proposals will require changes to the highway and therefore traffic regulation orders will need to be advertised and made. These will be advertised and consulted on in accordance with the Local Authorities' Traffic Orders (Procedures) (England and Wales) Regulations 1996, or the Road Traffic (Temporary Restrictions) Procedure Regulations 1992 in respect of temporary orders.
- 5.2 As part of the design, we shall consider Section 17 of the crime and disorder act 1998, to ensure that we do all that it reasonably can to mitigate the impacts of crime and disorder, substance misuse and reoffending.

6 COMMENTS OF THE CHIEF FINANCE OFFICER

- 6.1 All costs associated with the consultation process have been contained within existing revenue budgetary provision.
- 6.2 The implementation of Option 1 is estimated to cost £2.5m and Option 3 is £1.2m. It is anticipated that some of this expenditure will result in new assets and therefore will be capital in nature, with the investment falling in 2023/24 and 2024/25. However, any abortive costs would be charged to General Fund revenue, where again there is no budgetary provision. It is proposed to meet any abortive costs from the Parking Control reserve. Unallocated funds forecast to the end of 2026/27 are sufficient to meet this cost.
- 6.3 There is currently no capital funding for the Liveable Streets programme within the approved capital programme. Therefore, to progress these options the capital governance process will need to be completed to secure funding.

7 COMMENTS OF LEGAL SERVICES

- 7.1 The liveable streets scheme for the Old Bethnal Green Road area was introduced as an Experimental Traffic Order (“ETO”) in June 2020 and subsequently made permanent in December 2021.
- 7.2 The scheme for Arnold Circus and Colombia Road areas (Weavers) was introduced as an ETO in February 2021, amended in July 2021 and made permanent in April 2022.
- 7.3 Should Option 2 (retention of the schemes) is preferred, no further action is required as the existing permanent traffic orders will remain in place, unaffected by this decision.
- 7.4 Should either Option 1 (revocation of the schemes) or Option 3 (amendments to the schemes) are preferred, new traffic management orders will be required - Schedule 9, paragraph 27 of the 1996 Local Authorities Traffic Orders (Procedure)(England and Wales) Regulations states that the power to make an order includes the power to make or revoke an order.
- 7.5 Option 1 would require revocation orders to be made and, once in force, the existing restrictions imposed under the current orders would cease to have effect.
- 7.6 Option 3 would require i) revocation orders to end the existing restrictions, and ii) the making of a new ETO(s) to bring the new restrictions into being. The making of an ETO would open up a period in which objections to the order could be made.
- 7.7 The courts have emphasised that an ETO should be genuinely experimental in nature, designed to glean information about the workings of a scheme in practice. The detail in the body of the report outlines the experimental nature of the proposal and the information that it is hoped will be obtained to enable a decision to be reached in due course about the long-term future of the proposals. The proposal in Option 3 meets with the legal requirements of an experimental scheme.
- 7.8 The power to make (or not to make) an order is discretionary - simply because there may have been a particularly active campaign (either for or against a proposal) does not automatically mean that option should be followed. The test against which any decision will be considered is whether the decision to make or not make an order was so unreasonable that no reasonable person acting reasonably could have made it.
- 7.9 The Road Traffic Regulation Act 1984 provides the statutory basis on which traffic orders may be made -
- Avoiding danger to people or traffic
 - Preventing damage to the road or to buildings on or near the road
 - Facilitating the passage of traffic (including pedestrians)
 - Preventing the use of the road by unsuitable traffic

- Preserving the character of the road, especially where the road is suitable for walking or horse-riding
- Preserving or improving the amenities of the area through which the road runs
- Air quality

- 7.10 The courts have recently set out how a decision maker should react when considering whether respond or not to make a traffic order –
- keep in mind the statutory duty under s122 Road Traffic Regulation Act 1984 to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians), so far as practicable.
 - have regard to factors which might point in favour of making the order – these factors include the effect on local amenities and all the relevant factors listed in s1 Road Traffic Regulation Act 1984.
 - balance the various considerations and make the appropriate decision
- 7.11 When considering whether to make or revoke a traffic order, the decision maker must consider wider statutory duties. These include –
- Exercising our powers under s122 Road Traffic Regulation Act 1984 to secure so far as practicable the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians).
 - Any duties under the Traffic Management Act 2004 to secure the expeditious movement of traffic on the local traffic network.
 - Equalities – detailed in the body of the report
- 7.12 Consultation has been undertaken, including with the public. The feedback from that consultation is but one element of the balancing exercise required to be carried out in the decision-making process.

Linked Reports, Appendices and Background Documents

Linked Report

- NONE

Appendices

Appendix A – Option scheme plans
 Appendix B – Old Bethnal Green Road Area Consultation results report
 Appendix C – Weavers Consultation results report
 Appendix D – Options Evaluation
 Appendix E – Old Bethnal Green Road Area Consultation Document
 Appendix F – Weavers Area Consultation Document
 Appendix G – Equalities Impact Assessment
 Appendix H – Background data

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

- NONE

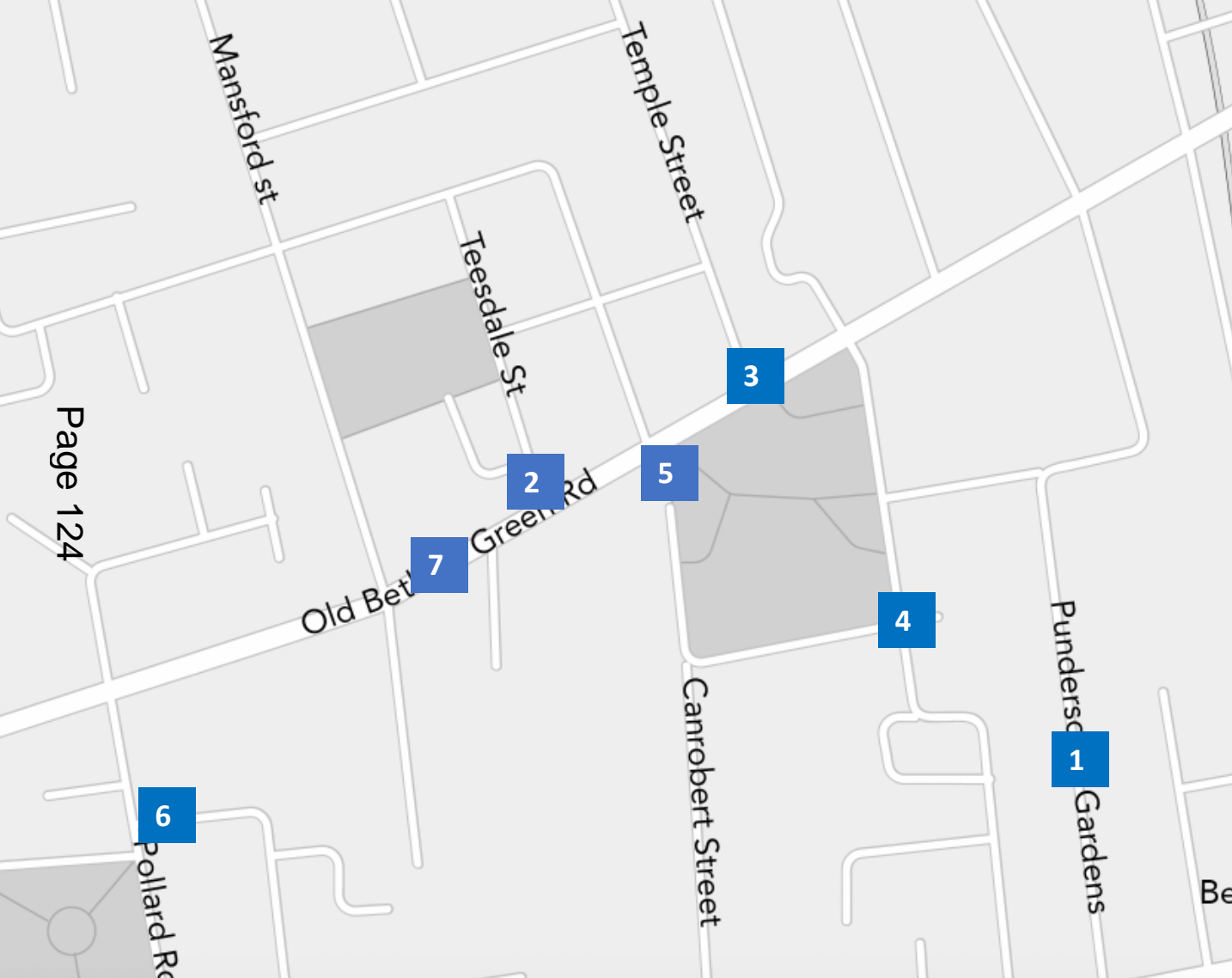
**Officer contact details for documents:
Ashraf Ali – Head of Highways and Transportation**

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Liveable Streets Area maps

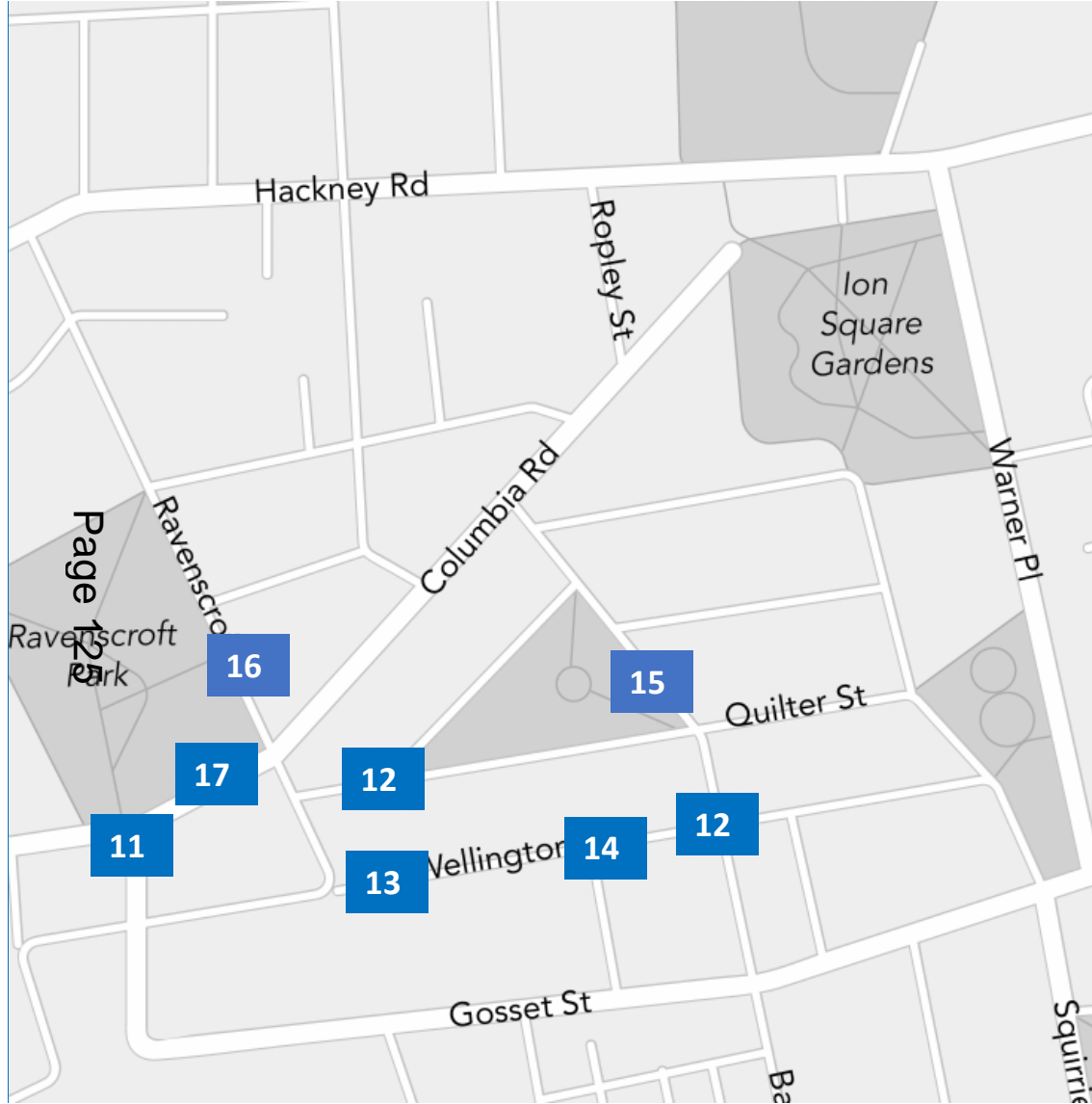


Option 1 Old Bethnal Green Road Proposals Map



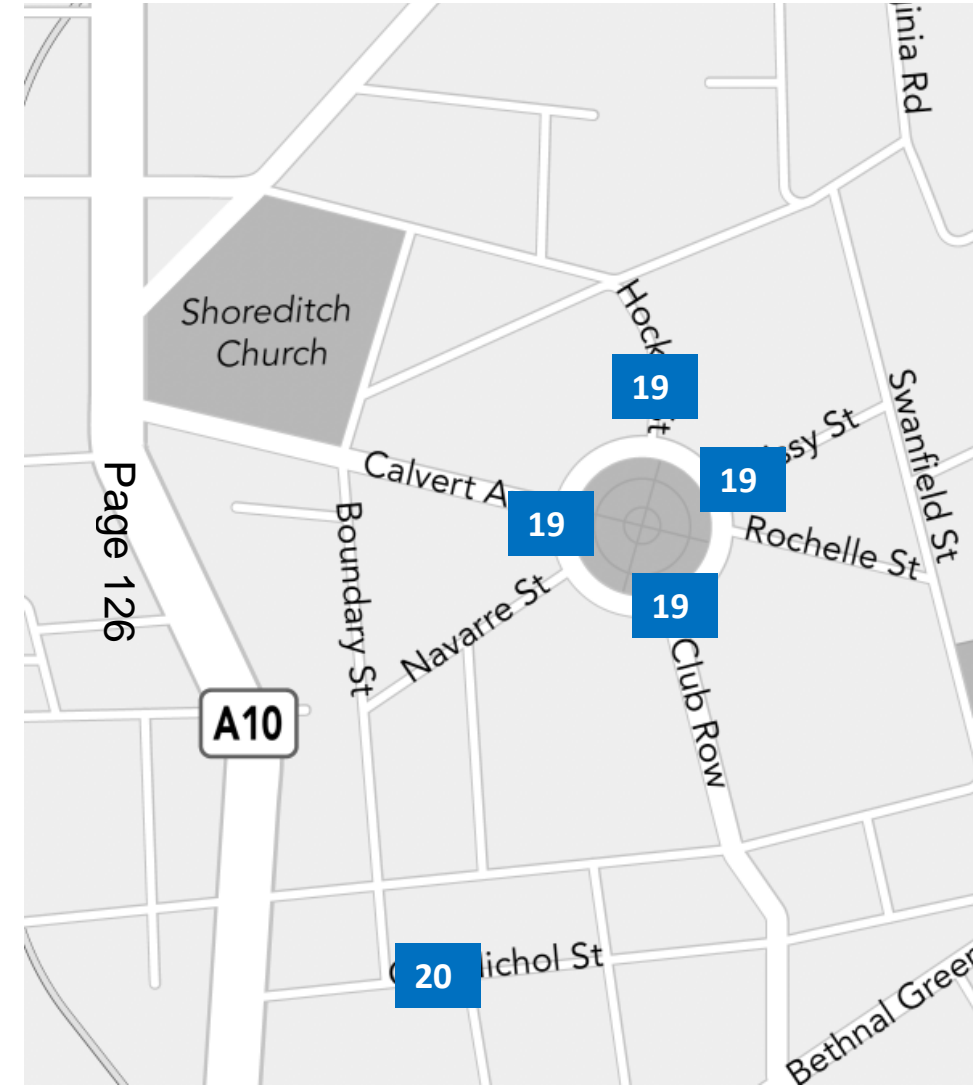
- 1** Removal of closure on Punderson's Gardens
- 2** Removal of closure on Teesdale Street
- 3** Removal of closure on Old Bethnal Green Road
- 4** Removal of closure on Clarkson Street
- 5** Removal of closure on Canrobert Street
- 6** Removal of closures on Pollard Street and Pollard Row
- 7** Making Old Bethnal Green Road two way between Pollard Row and Clarkson Street

Option 1: Columbia Road Proposals Map



- 11** The removal of the closure on the junction of Columbia Road and Gosset Street and Gosset Street and allowing southbound traffic only
- 12** The removal of closures on Quilter Street and the junction of Wellington Row and Barnet Grove
- 13** Wellington Row would be one way westbound from the junction of Delta Street to the junction with Gosset Street
- 14** Wellington Row would be one way eastbound from the junction of Delta Street to the junction with Durant Street
- 15** Barnet Grove kept two way with prohibitions to northbound traffic to allow for emergency service vehicles
- 16** Making one-way sections on Ravenscroft Street (between Ezra Street and Columbia Road) two way
- 17** Making one-way section on Columbia Road (between Chambord Street and Ravenscroft Street) two way

Option 1: Arnold Circus Proposals Map



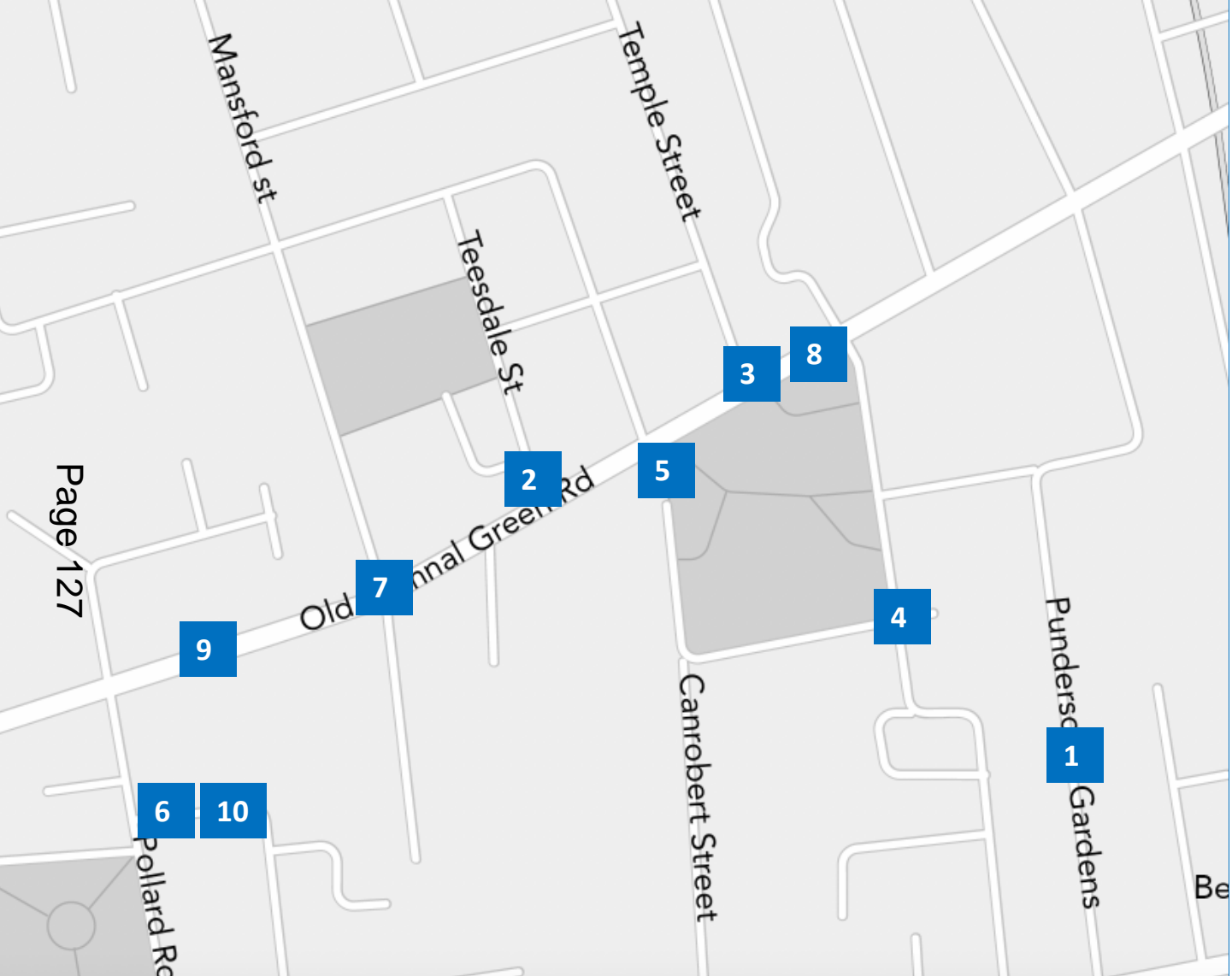
19

Removal of closures at each arm of Arnold Circus

20

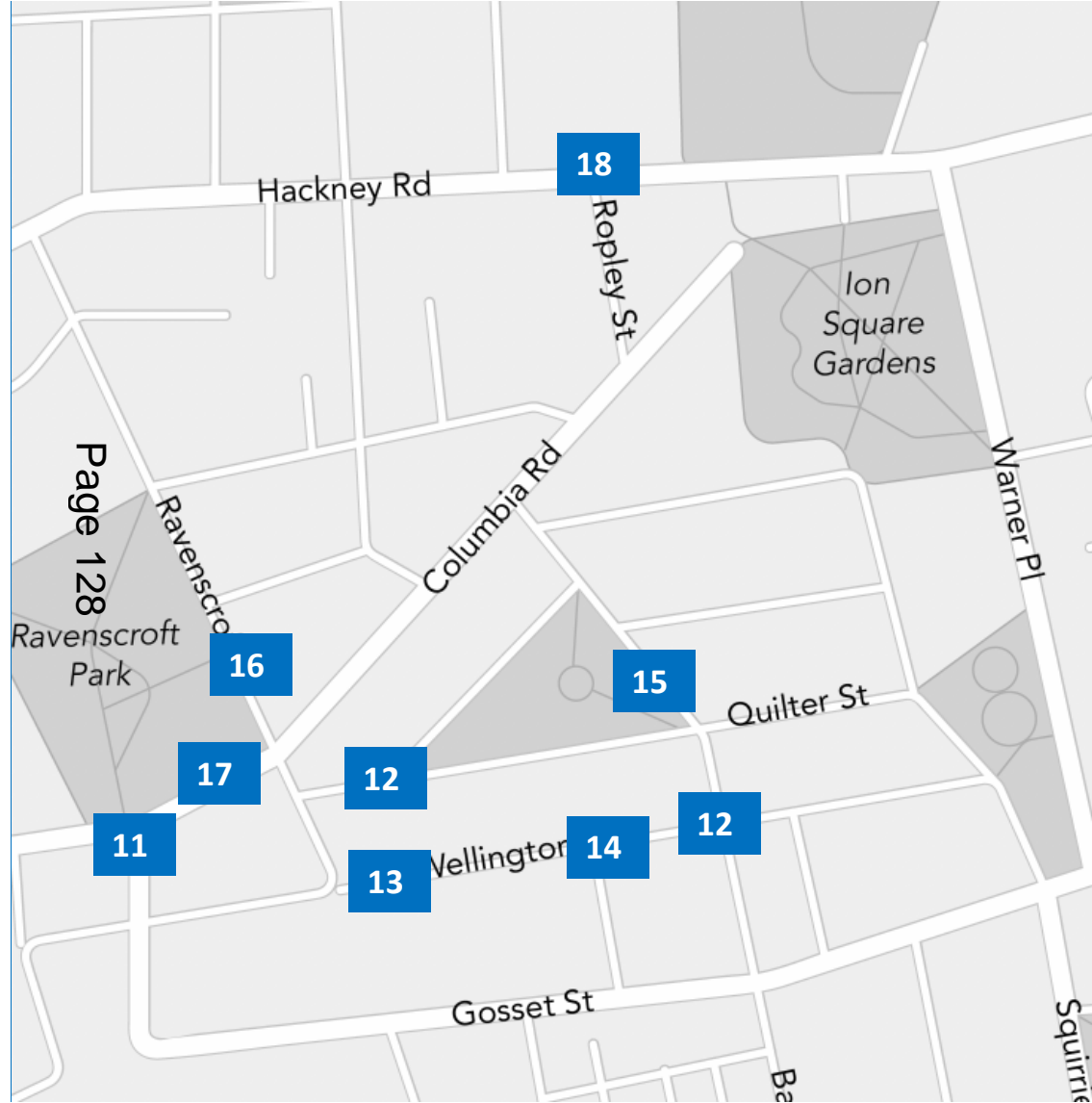
Removal of Closure on the junction between Old Nichol Street

Option 3: Old Bethnal Green Road Proposals Map



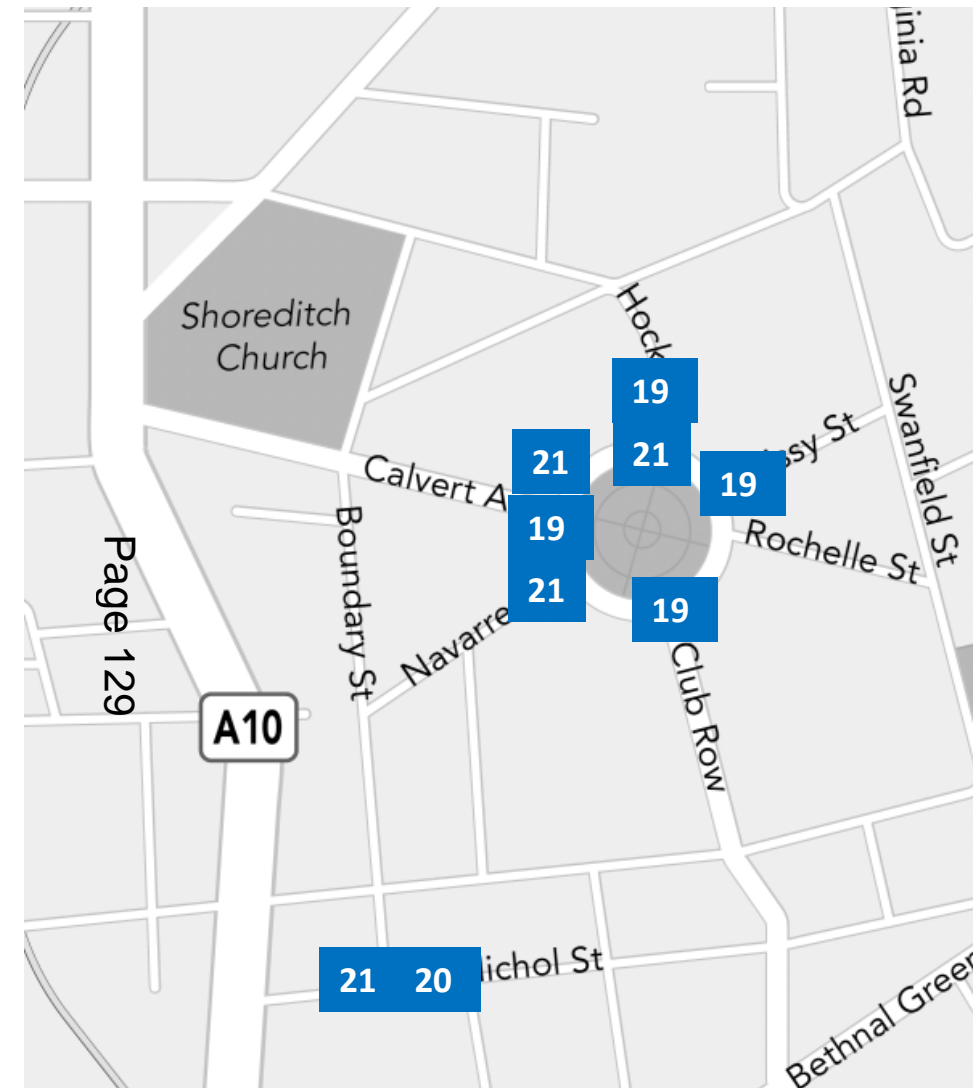
- 1** Removal of closure on Punderson's Gardens
- 2** Removal of closure on Teesdale Street
- 3** Removal of closure on Old Bethnal Green Road
- 4** Removal of closure on Clarkson Street
- 5** Keep closure on Canrobert Street
- 6** Removal of closures on Pollard Street and Pollard Row
- 7** Keep Old Bethnal Green Road one way between Pollard Row and Clarkson Street
- 8** New camera filters on Old Bethnal Green Road junction with Temple Street to operate during peak times (with resident exemption)
- 9** Widen footway on Old Bethnal Green Road between Mansford Street and Pollard Row
- 10** New school street on Pollard Street

Option 3: Columbia Road Proposals Map



- 11** The removal of the closure on the junction of Columbia Road and Gosset Street and Gosset Street and allowing southbound traffic only
- 12** The removal of closures on Quilter Street and the junction of Wellington Row and Barnet Grove
- 13** Wellington Row would be one way westbound from the junction of Delta Street to the junction with Gosset Street
- 14** Wellington Row would be one way eastbound from the junction of Delta Street to the junction with Durant Street
- 15** Barnet Grove kept two way with prohibitions to northbound traffic to allow for emergency service vehicles
- 16** Keep one-way section on Ravenscroft Street (between Ezra Street and Columbia Road)
- 17** Making one-way section on Columbia Road (between Chambord Street and Ravenscroft Street) two way.
- 18** New camera filter on Hackney Road junction with Ropley Street to operating Monday to Saturday. Only restricts turning from Hackney Road into Ropley Street (with resident exemption)

Option 3: Arnold Circus Proposals Map



19

Removal of closures at each arm of Arnold Circus

20

Removal of Closure on the junction between Old Nichol Street

21

Four new camera filters on Old Nichol Street and Arnold Circus junction with Calvert Avenue, Navarre Street and Hocker Street restricting night-time through travel and associated ASB (with resident exemption)

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Appendix B – Old Bethnal Green Road Area Consultation results report

Executive Summary

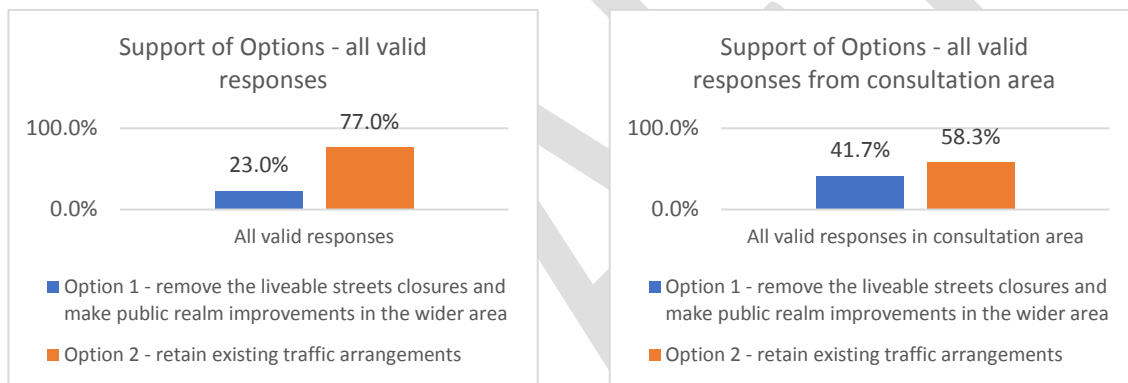
Analysis in this report includes the proportion of respondents who supported the two proposed options, and hereafter called Option 1 and Option 2.

- **I support Option 1 to remove the liveable streets closures and make public realm improvements to the wider area (Option 1)**
- **I support Option 2 to retain the existing traffic arrangements (Option 2)**

Survey responses have been presented in two ways:

- By all Valid respondents and
- By Valid respondents living in the consultation area.

The majority of valid survey responses were in support of Option 2, to retain existing traffic arrangements for both cases.



Background

The public consultation ran 23rd January 2023 and 12th February 2023 and sought view on options which have been developed for residents to consider. This report analyses the responses to the survey.

Responders were asked about their support for two options arising from the evaluation:

- I support Option 1 to remove the Liveable Streets closures and make public realm improvements to the wider area.
- I support Option 2 to retain the existing traffic arrangements

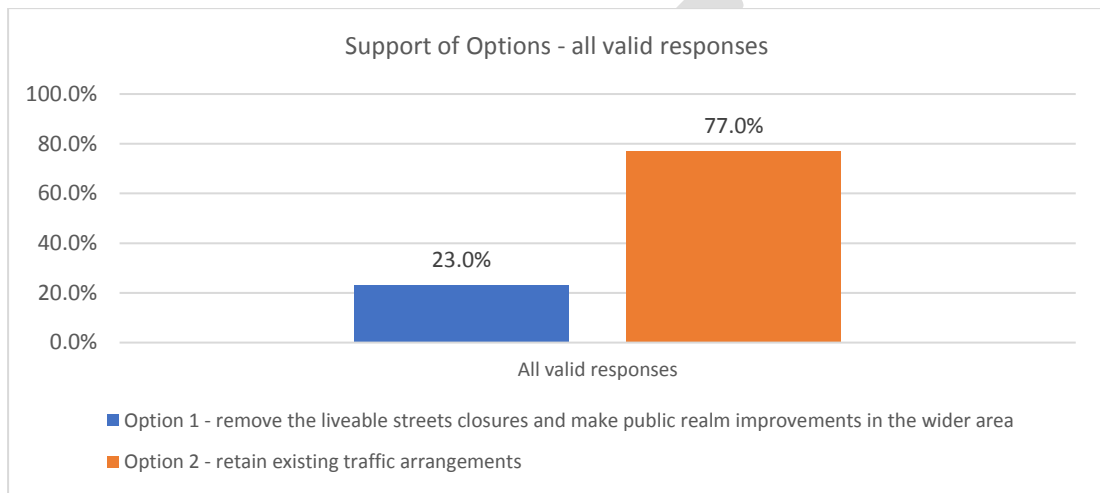
All responses

2,061 valid survey responses were received.

Of those, 1,560 were received online, and 501 were paper surveys.

Overall,

- Option 1 – to remove the liveable streets closures and make public realm improvements in the wider area received support from 473 survey respondents representing 23% of the share, and
- Option 2 – to retain existing traffic arrangements received support from 1,588 survey respondents representing 77% of the share.



Responses from the consultation area

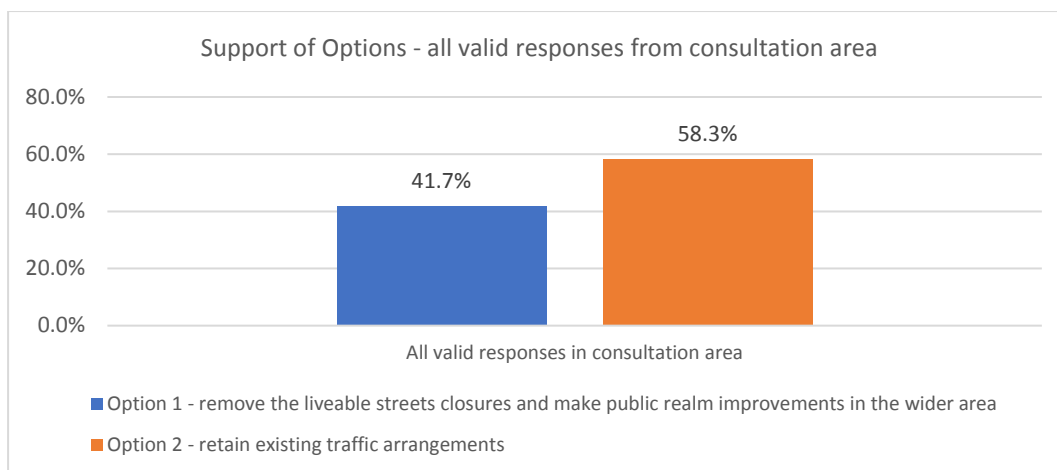
A unique reference number was provided in a letter and sent to all businesses and households within the Liveable Streets scheme area to help distinguish between those responding who may be directly impacted by the proposals.

To further ascertain whether these responses were genuinely received from respondents from within the consultation area, we checked the postcode provided by online survey responders with the postcodes held for the borough. We discounted a small number where the respondent provided a code but provided an address outside of the consultation area. The combination of the use of the resident code and a postcode from within the consultation area is how we have determined which response is from the consultation area.

In total 745 valid survey responses were from responders who used the resident code and provided a postcode that was in the survey area.

Of those,

- 311 supported option 1 – to remove the liveable streets closures and make public realm improvements in the wider area, and
- 434 supported option 2 – to retain existing traffic arrangements.



Analysis

Analysis in this report includes the proportion of respondents who supported the two proposed options, and hereafter called Option 1 and Option 2.

- **I support Option 1 to remove the liveable streets closures and make public realm improvements to the wider area (Option 1)**
- **I support Option 2 to retain the existing traffic arrangements (Option 2)**

Survey respondents were asked which of the following best describes you? (please tick all that apply)

1,866 survey respondents described themselves as a resident and 135 described themselves as a business owner. 40 responses from business owners came from the consultation area. Of those four supported Option 1 and 36 supported Option 2.

Residents were asked, to what extent do you agree or disagree with the proposed changes set out in Option 1

Most residents disagreed with the proposed changes. The most popular proposal relates to improvements to footways and crossing across the Bethnal green Area including dropped kerbs, continuous crossing and new zebra crossings with 53% of all respondents agreeing with this proposal.

Q5 (To what extent do you agree or disagree with the proposed changes set out in option 1:) Removal of closures on Canrobert Street, Punderson's Gardens, Teesdale Street, Clarkson Street and Old Bethnal Green Road.	All valid responses	All valid responses in scheme area
Did not answer	1.9%	3.8%
Agree	22.1%	38.9%
Disagree	74.7%	55.7%
Neutral	1.3%	1.6%

Grand Total	100.0%	100.0%
Q5 (To what extent do you agree or disagree with the proposed changes set out in option 1:) Retention of the closures on Pollard Row and Pollard Street and creation of a new public realm in the area with new seating, planting and trees. This is the retention of a closure to northbound traffic on Pollard Row (at the junction of Ivimey Street) and a closure to traffic travelling eastbound on Pollard Street (at the junction with Pollard Row). The plans on page 6 of the consultation document also propose the removal of closures that currently restrict westbound traffic on Pollard Street and southbound traffic on Pollard Row.	All valid responses	All valid responses in scheme area
Did not answer	3.8%	5.9%
Agree	34.8%	34.4%
Disagree	51.1%	49.9%
Neutral	10.2%	9.8%
Grand Total	100.0%	100.0%
Q5 (To what extent do you agree or disagree with the proposed changes set out in option 1:) Conversion of Old Bethnal Green Road to two-way operation to improve access	All valid responses	All valid responses in scheme area
Did not answer	2.5%	4.3%
Agree	22.0%	38.9%
Disagree	72.7%	54.1%
Neutral	2.8%	2.7%
Grand Total	100.0%	100.0%
Q5 (To what extent do you agree or disagree with the proposed changes set out in option 1:) Improvements to footways and crossing across the Bethnal green Area including dropped kerbs, continuous crossing and new zebra crossings	All valid responses	All valid responses in scheme area
Did not answer	3.1%	5.8%
Agree	53.8%	53.0%
Disagree	29.9%	29.3%
Neutral	13.2%	11.9%
Grand Total	100.0%	100.0%

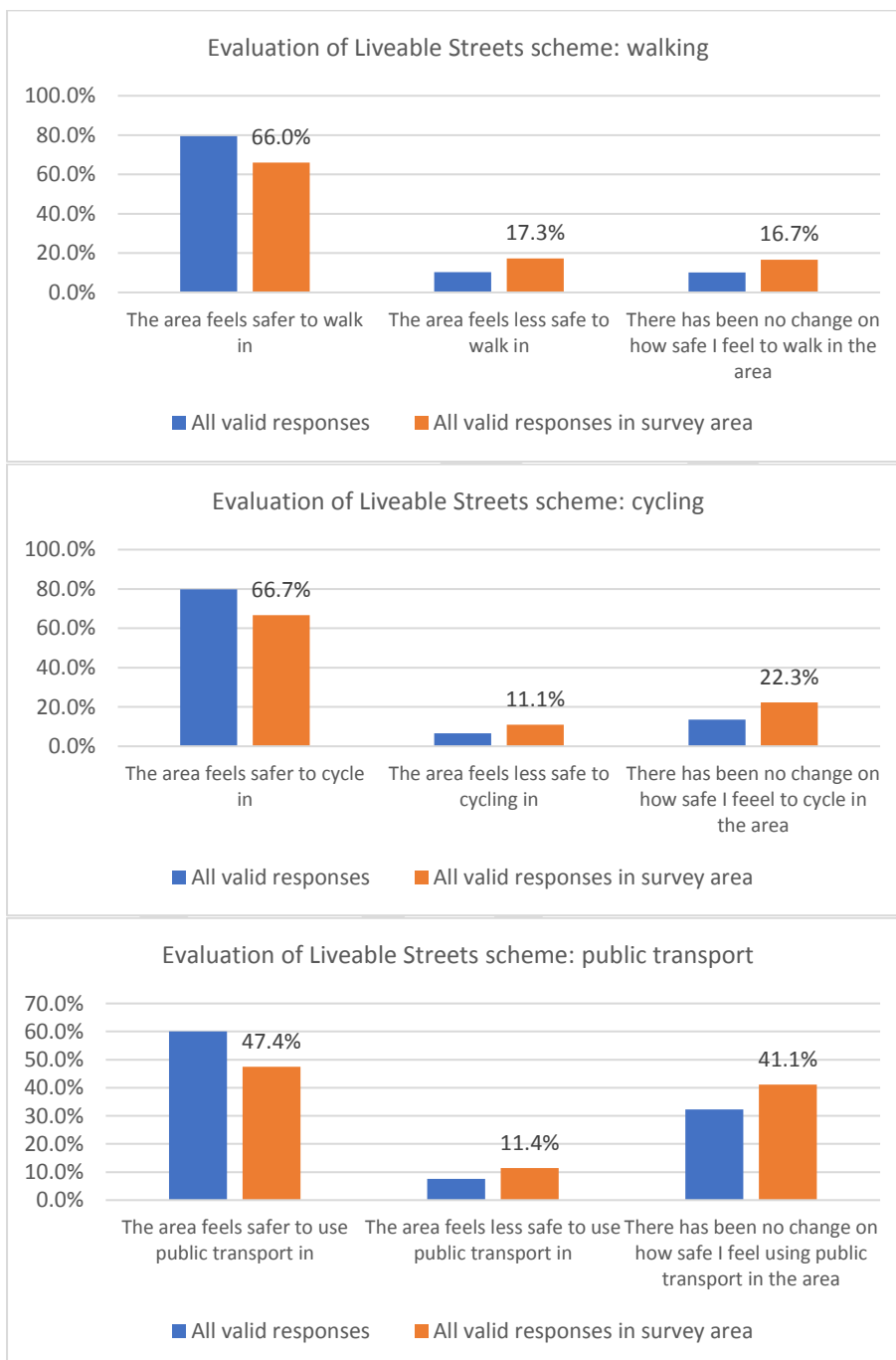
Evaluation of existing scheme

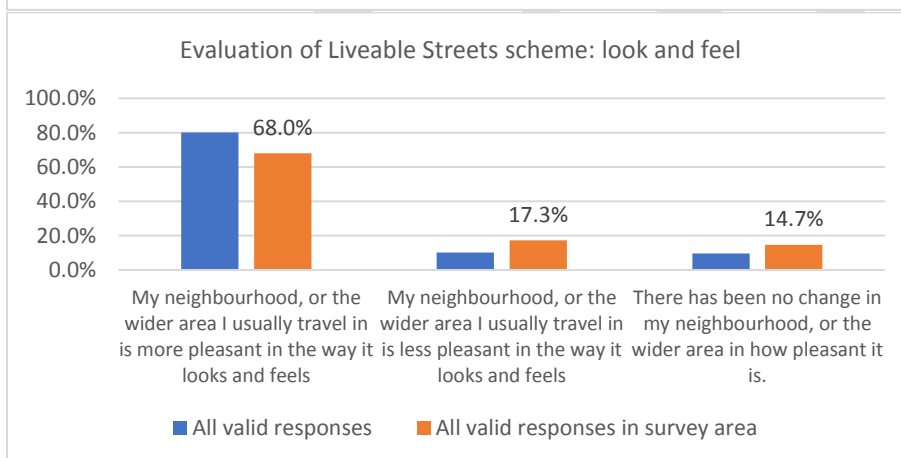
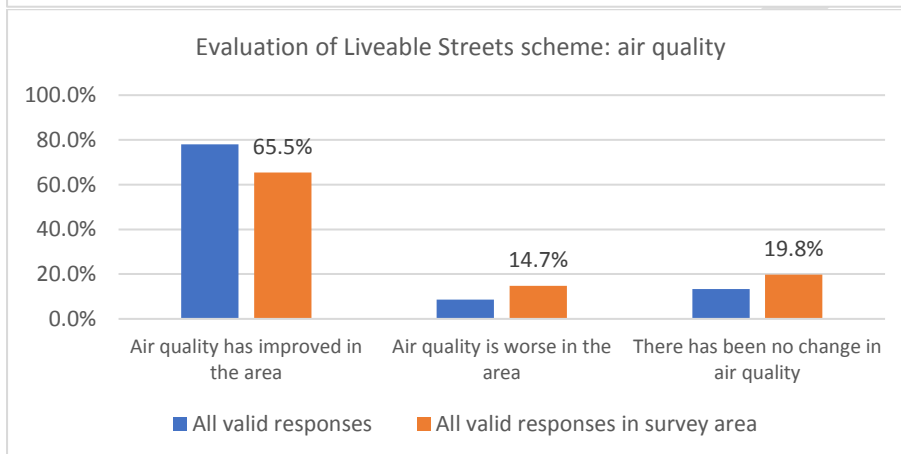
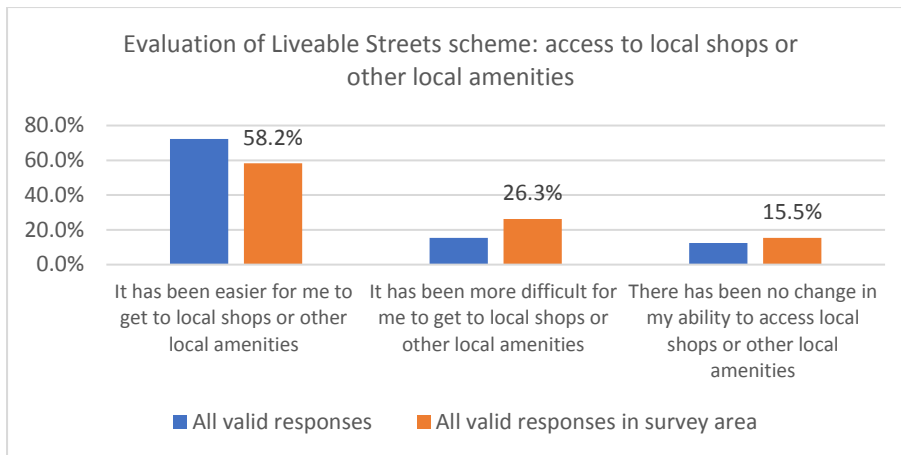
Survey responders were asked to evaluate the existing scheme. Responders were asked their opinion in a range of areas: Since the changes to roads in Bethnal Green were introduced under the Liveable Streets Scheme.

- Walking
- Cycling
- Use of public transport
- Traffic
- Access to shops and local amenities
- Air quality
- Traffic noise
- More pleasant neighbourhood

Overall, the majority of survey respondents reported positive effects since the introduction of liveable streets in all areas.

Most positive was around an improvement in traffic noise with 71.4% of respondents from the scheme area agreeing with this statement. The least positive was around access to local shops or other local amenities where 26.3% of respondents from the scheme area stated that it has been more difficult to get to local shops or other local amenities.

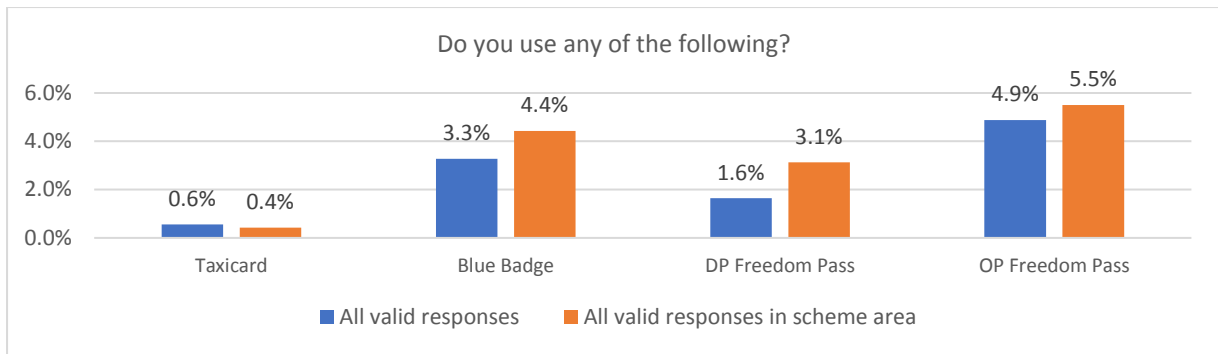




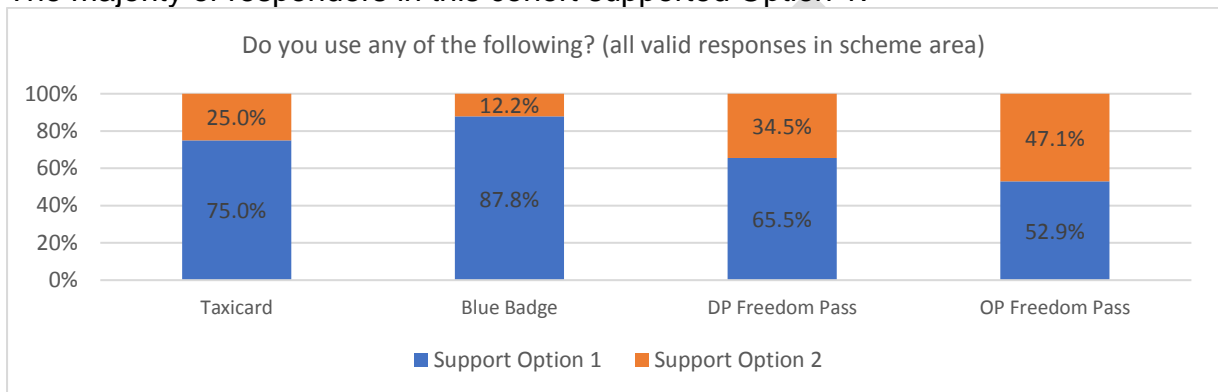
Travel Survey

Survey respondents were asked whether they used any of the following travel schemes?

In total 223 survey responders said that they use one or more of the following travel schemes: Taxicard; Blue badge; DP Freedom Pass; OP Freedom Pass and some responders made use of more than one of these schemes. This represents 10.8% of all survey responders.



The majority of responders in this cohort supported Option 1.



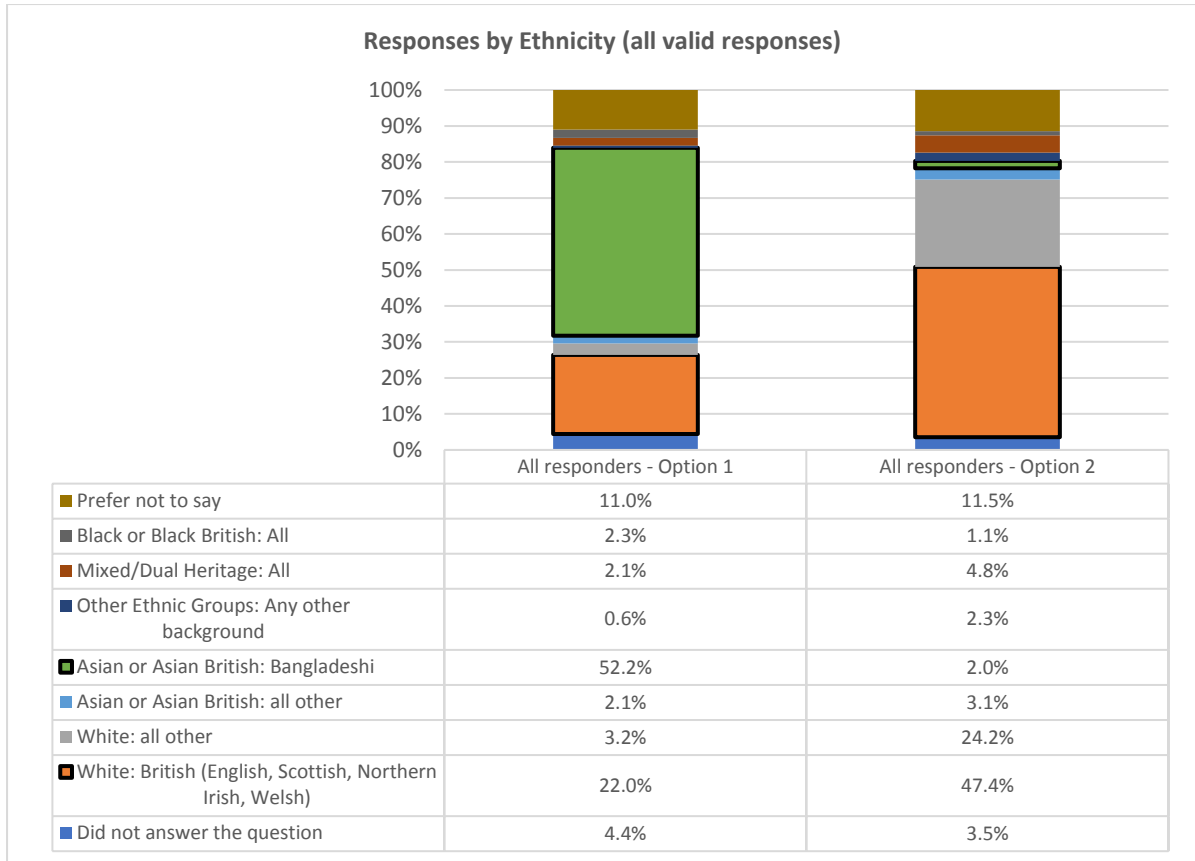
Equalities Analysis

Ethnicity

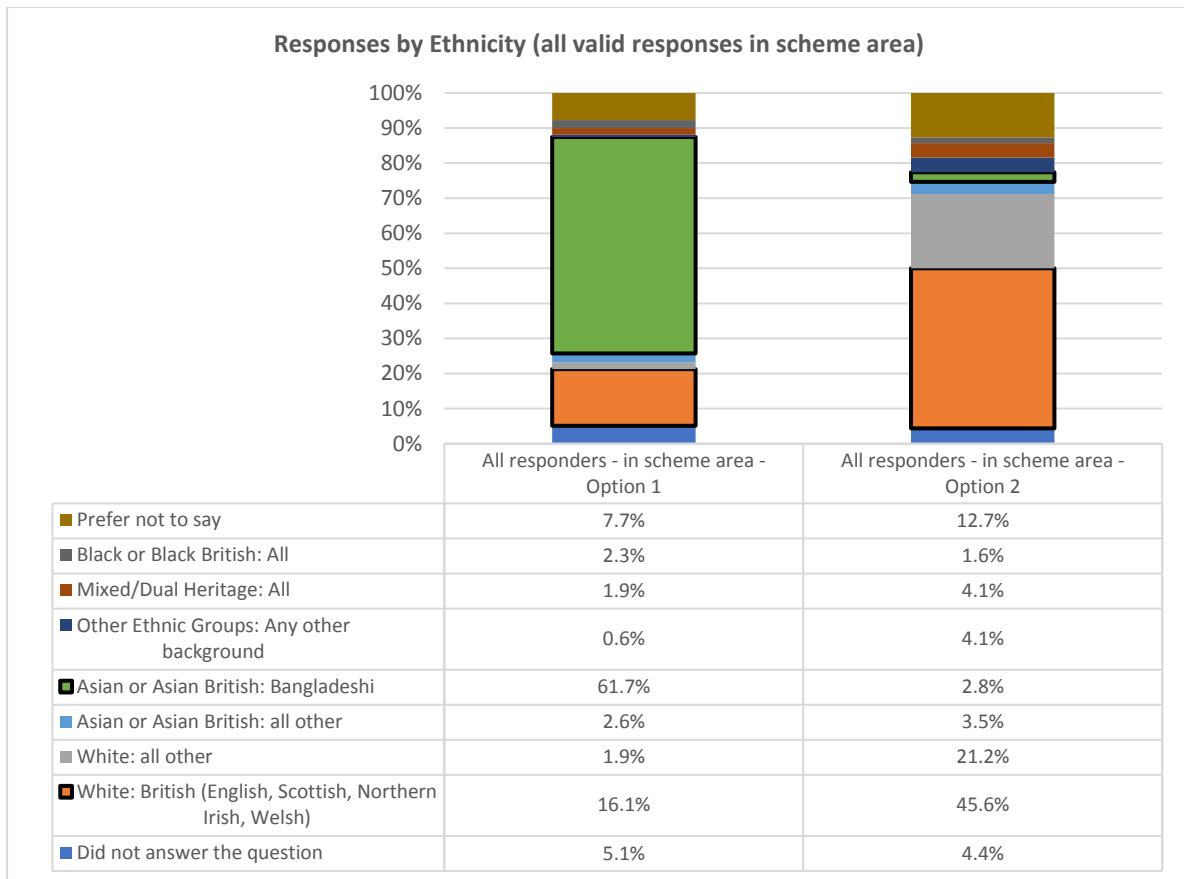
41.5% of all valid responses came from people who described themselves as White British. 12.1% of White British responders voted for Option 1 and 87.8% voted for Option 2. 33.2% of valid responses from within the scheme area were from White British responders and of those 20.1% voted for Option 1 and 79.9% voted for Option 2.

Responders from Asian or Asian British: Bangladeshi backgrounds accounted for 13.5% of all valid responses. 88.5% of Bangladeshi responders voted for Option 1 and 11.5% voted for Option 2. 27.3% of valid responses from within the scheme area were from Bangladeshi responders and of those 94.1% voted for Option 1 and 5.9% voted for Option 2.

The table below show the proportion of total valid responses received by ethnicity and support for each option.



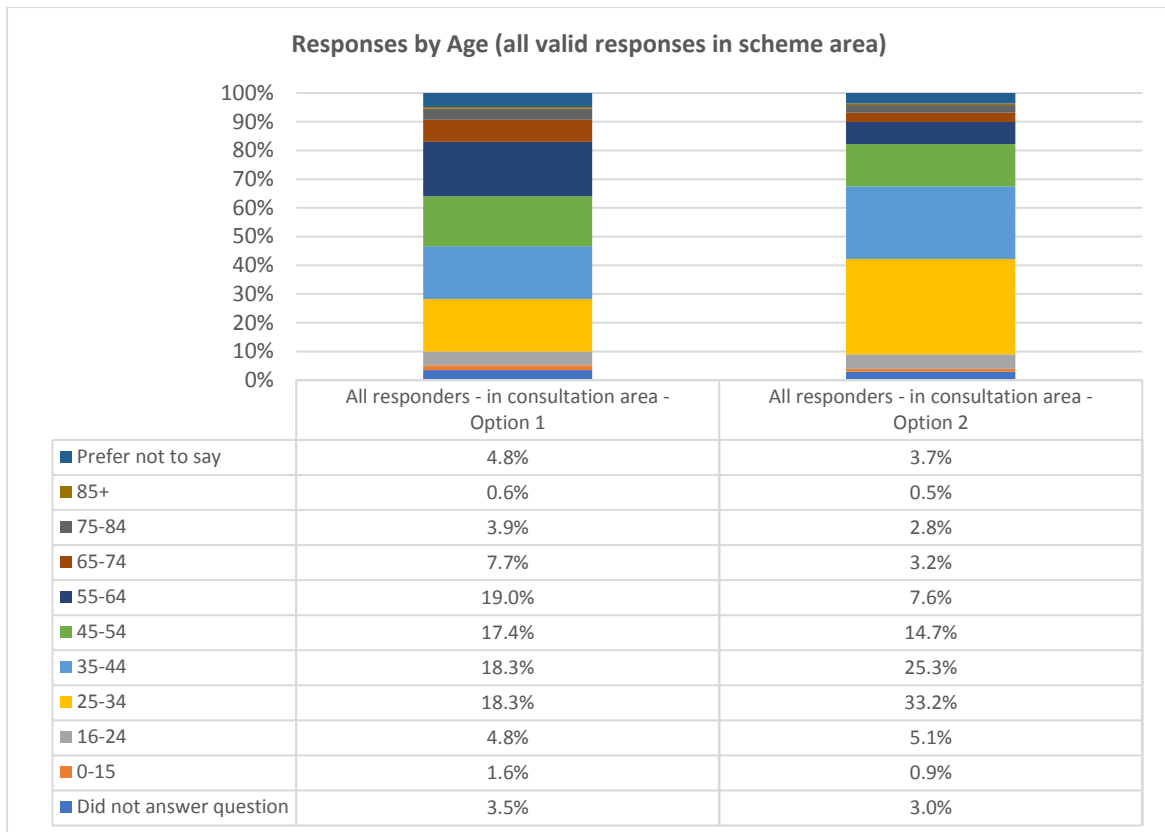
The table below show the proportion of valid responses received from responders living in the scheme area by ethnicity and support for each option.



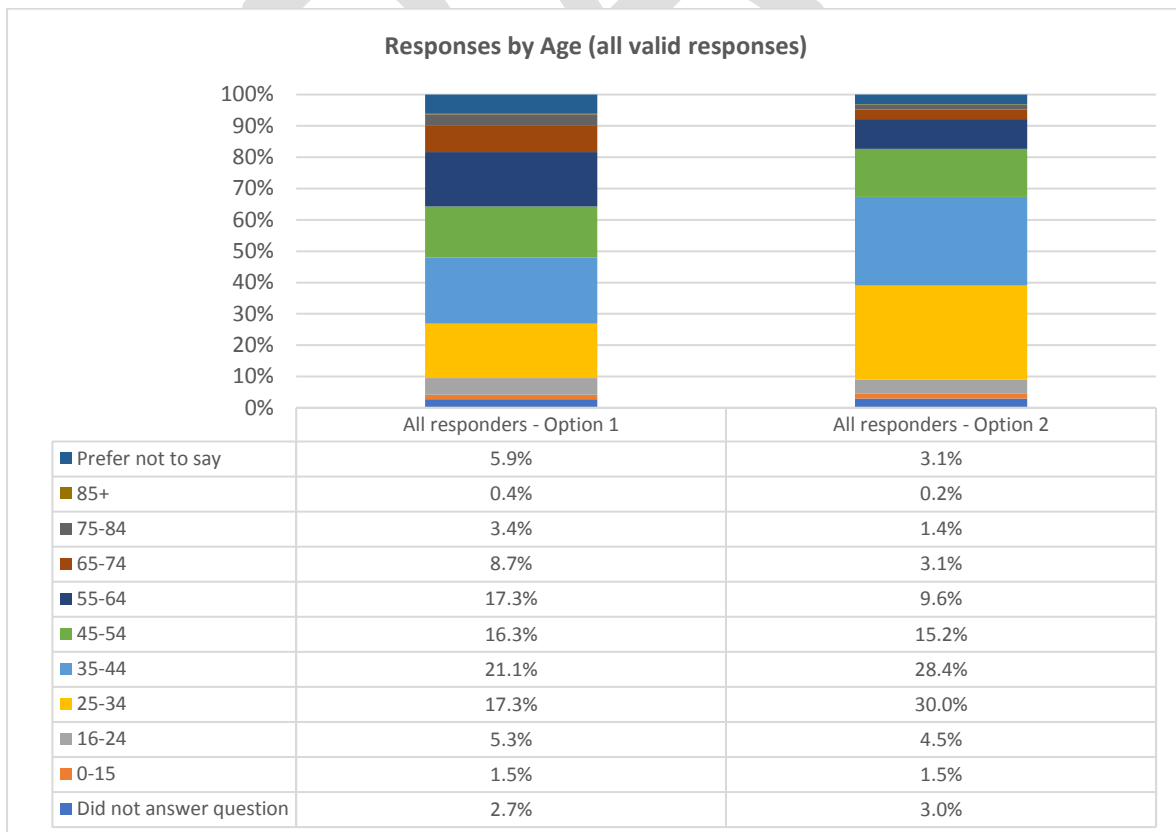
Age

The majority of respondents are of working age. There is a higher proportion of respondents of working age overall and within the consultation area that support Option 2. A higher proportion of older respondents in the consultation area support Option 1. The age ranges with the most respondents are 25-34 and 35-44 years; these age ranges are more likely to be parents than other age groups. Around 18% of respondents are aged 55 and over; this age range is more likely to have a disability or mobility issues than other age ranges.

The table below show the proportion of total valid responses received by age range and support for each option.

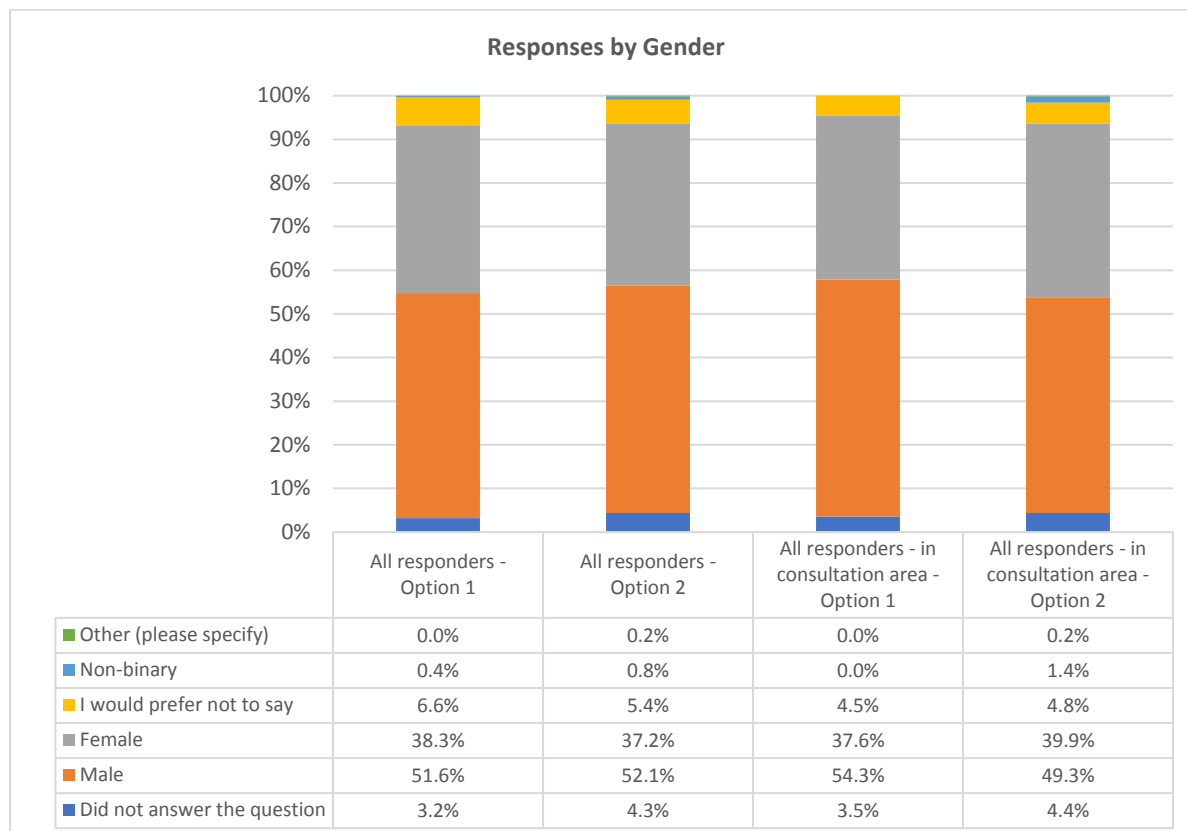


The table below show the proportion of valid responses received from responders living in the scheme area by age range and support for each option.



Gender

Survey respondents were asked which best describes their gender. There were more male survey responders than female (52% compared to 37.5%). The table below show the proportion of valid responses received from responders living in the scheme area by age range and support for each option.



Gender same as registered at birth

99.5% of survey responders who answered this question said that their sex was the same as registered at birth. 12.4% of survey responders either did not answer the question or said they would prefer not to say. For survey respondents in the consultation area, the proportions were slightly lower. Less than 0.5% of survey responders said their sex was not the same as registered at birth; for this group, support for Option 2 was higher than for Option 1.

Sex registered on birth certificate

The responses for this protected characteristic for male and female are comparable to the question about gender. Fewer than 0.5% of survey respondents said they were intersex or described themselves in another way.

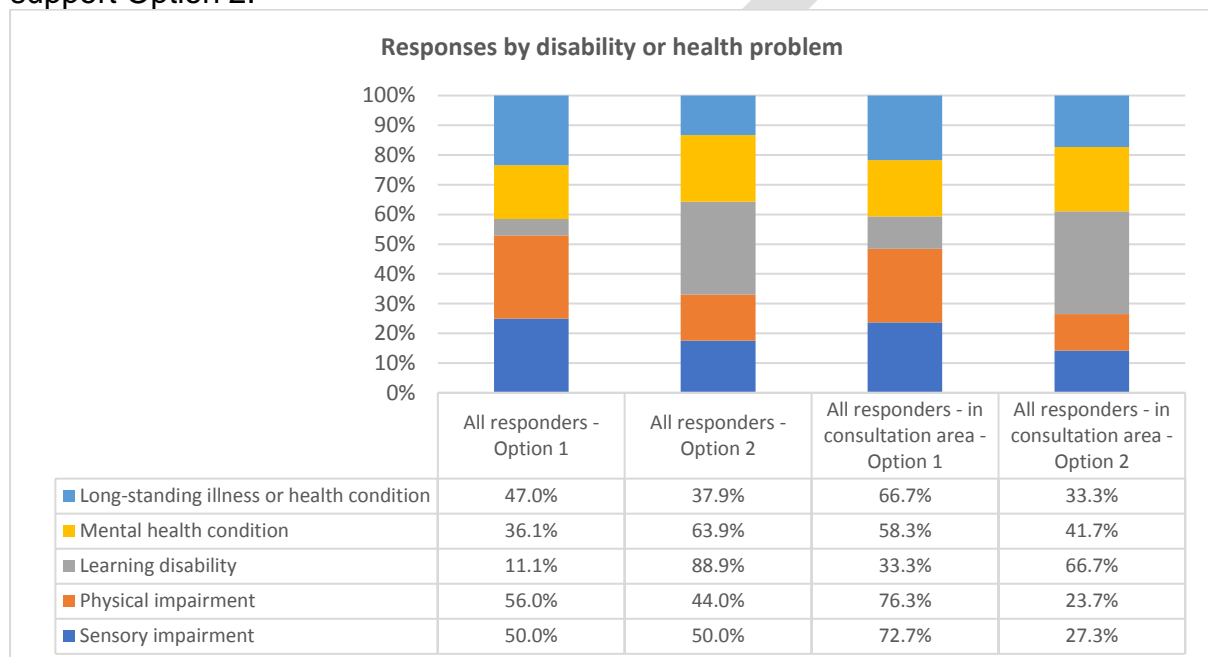
Disability

212 (10.2%) of all respondents and 98 (13.1%) respondents in the consultation area said yes when asked are your day-to-day activities limited because of a health

problem or disability which has lasted, or is expected to last, at least 12 months (include any problems related to age).

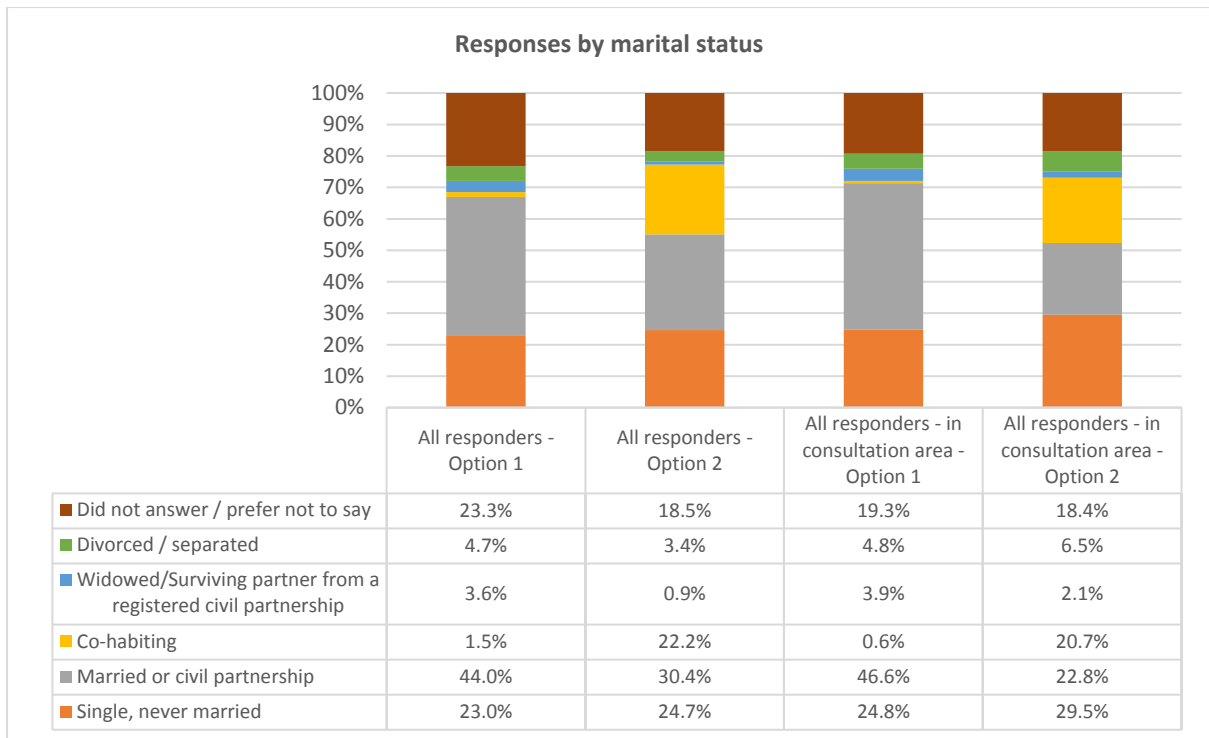
In both cases, the proportion of responses from respondents in this category were more in support of Option 1 than for Option 2. 72.1% of all survey respondents supported Option 1 and 70.4% of respondents in the consultation area supported Option 1.

Respondents were asked to state the type of health problem(s) or disability(y/ies) that applied to them. In general, respondents with a long-standing illness or health condition, a physical or sensory impairment were more likely to support Option 1 and respondents with a mental health condition or learning disability were more likely to support Option 2.



Marital Status

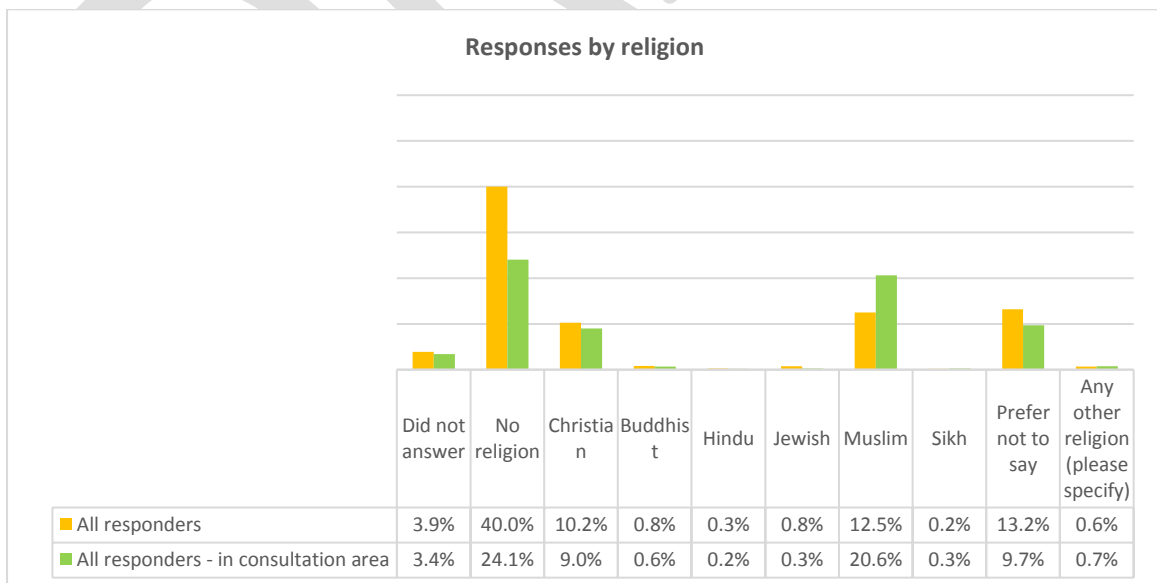
Overall, there was a higher proportion of survey respondents who said they were married or in a civil partnership, or who said they were single supported Option 2. Within the consultation area, married and civil partnership respondents were more supportive of Option 1. Widowed/surviving partners were more supportive of Option 1 however this is a small group of responders representing 1.8% of responders who answered this question. All other groups were more supportive of Option 2.

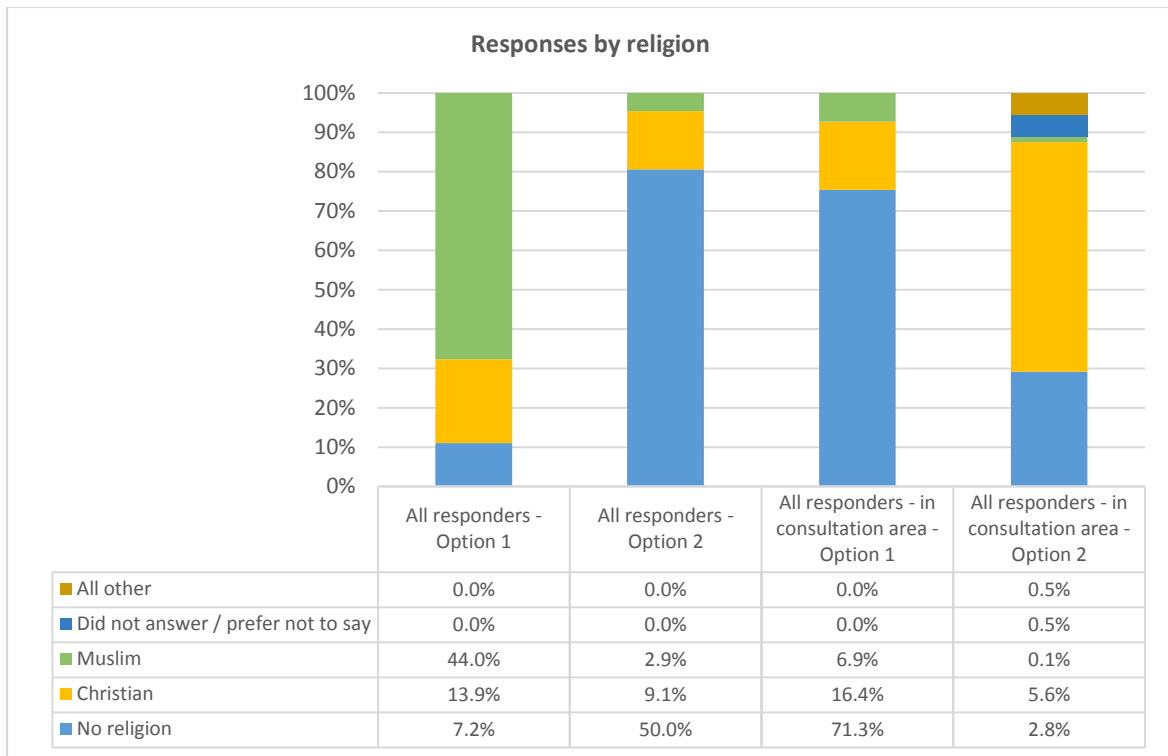


Religion

1,426 respondents stated they had no religion, or preferred not to say, or did not answer this survey question, equating to 57% of all responses received. The majority of these responders supported Option 2.

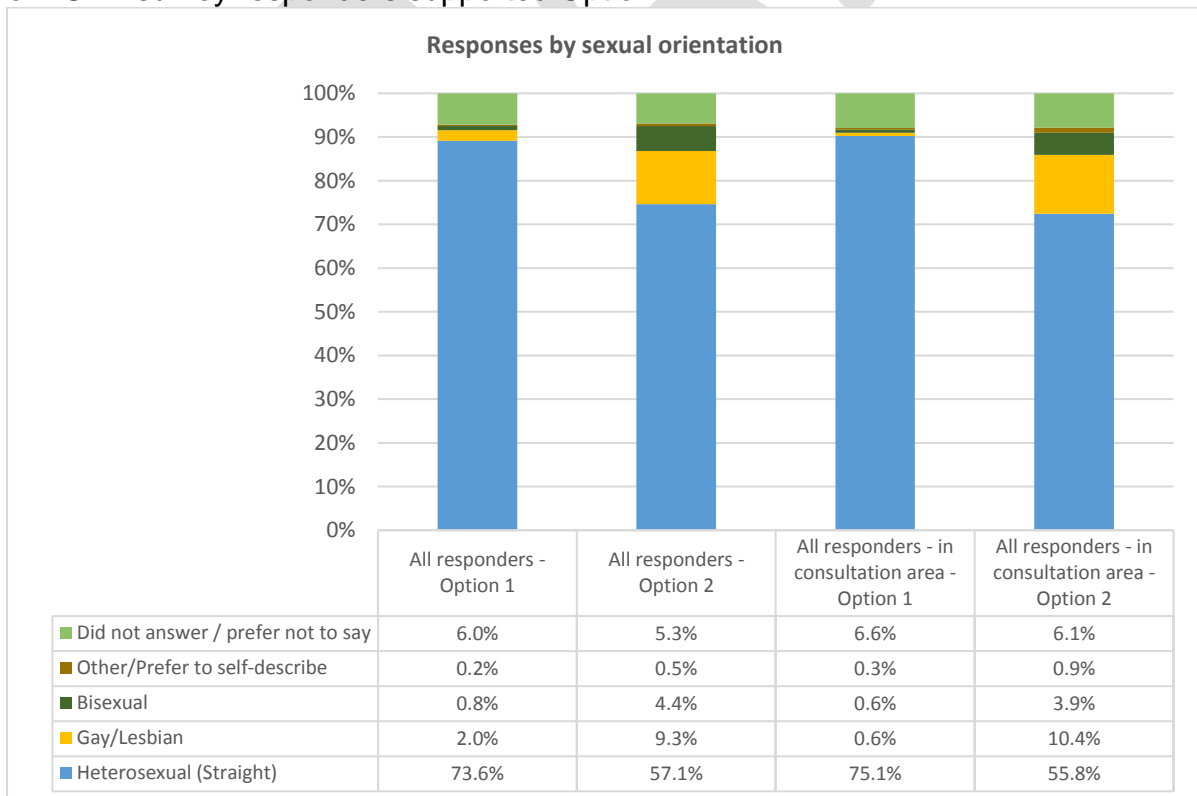
The next highest group was from respondents who said they were Muslim. Muslim respondents were more likely to support Option 1. Respondents who identified as Christian were more likely to support Option 2.





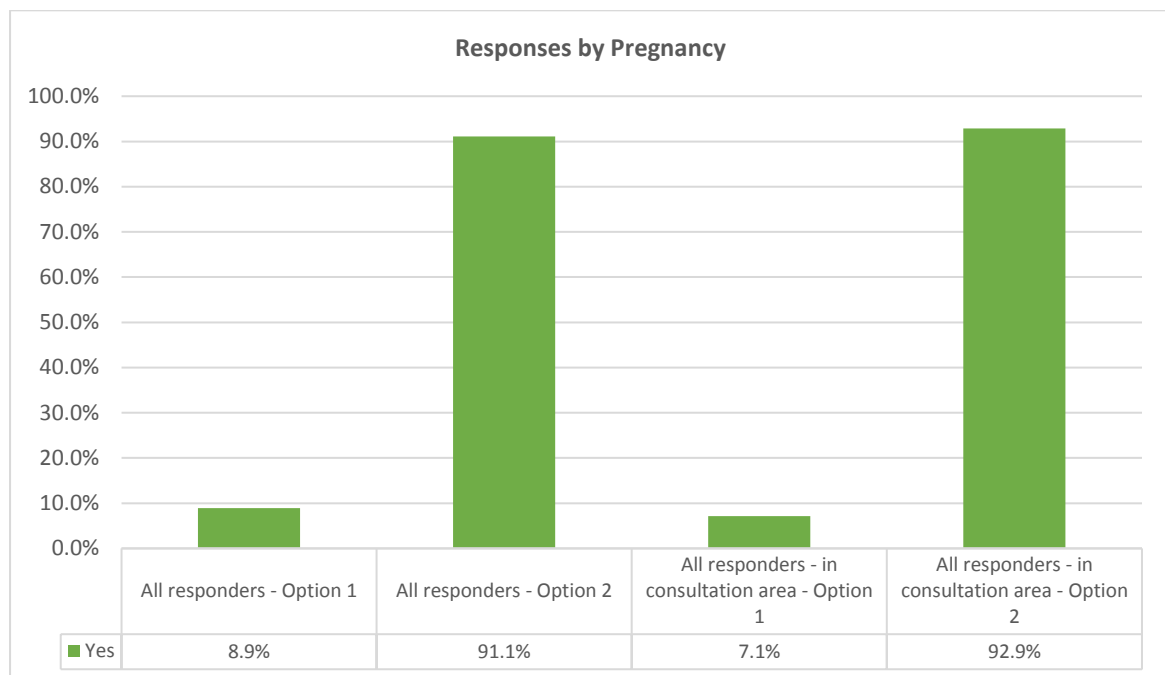
Sexual Orientation

60.9% of all survey respondents identified as heterosexual / straight and that rose slightly to 63.9% of survey respondents in the consultation area. A higher proportion of LGBT survey responders supported Option 2.



Pregnancy and Maternity

45 or 1.8% of overall survey respondents said they were currently pregnant or had been in the past year. Of those the majority were more supportive of Option 2 than Option 1.



Free text comments

Survey responders were given the opportunity to provide detail to supplement their survey responses. 1,102 comments were received – 265 from respondents who supported Option 1 and 837 from respondents who supported Option 2.

Comments from respondents with a disability or long-term health condition

132 comments were provided by survey responders with a disability or long-term health condition.

63 comments were provided by respondents with a disability or long-term health condition who supported Option 1. Their comments referred to the following themes.

- More crime / ASB since scheme was put in place. Easier for criminals to escape on smaller modes of transport. Creates space for young people to hang around.
- More difficult to get to where I want to go. More difficult for people to get to me.
- Created congestion, particularly just outside of the scheme area.
- Costs more in fuel because vehicles have further to travel.
- I / my family need a car but travel is now longer causing more pollution
- Delayed ambulances have seriously affected me
- Near misses between cyclists and pedestrians. The cycle lane is in conflict with pavement.
- Scheme is a waste of time and money

- I'm disabled and cycle lane outside my home makes it more difficult / dangerous to get to my car.
- I would like more dropped kerbs because I use a mobility scooter.

68 comments were provided by respondents with a disability or long-term health condition who supported Option 2. Their comments referred to the following themes:

- Friendlier environment. Being able to sit outside and chat with friends – brings out community spirit. I have made friends as more people are socialising outside.
- Area is more pleasant physical environment to be in
- The area feels safer to travel around
- Less traffic pollution
- Less traffic noise
- Made my mental / physical health better. I have chronic illness and spend a lot of time near my house, the significant reduction in traffic noise has helped both my mental and physical health. My epileptic seizures are better since traffic noise has reduced where I live.
- Much easier to walk around the area
- Much easier to cycle around the area
- Children are enjoying a calm, healthier and safer walk to school.
- Do not waste money changing the scheme.

Comments from business respondents

The consultation asked respondents whether they were responding as a business or owner of a business in the area. 153 of all survey respondents said they are a business owner, representing 7.4% of overall respondents. 55 respondents from the consultation area said they were a business owner (7.3% of all respondents in the consultation area).

Overall, 58% businesses responding to the consultation said the scheme had had a positive impact on their business (rising to 75.1% when including no impact). The percentage of businesses responding from within the consultation area who said that the Liveable Street scheme had had a positive impact on their business was lower at 48% (rising to 67.2% when including no impact).

Business responders who supported Option 1 provided the following comments.

- Many of my customers have no choice but to use a car or van to transport equipment. The harder it is to do that the less they are likely to use my business.
- People are avoiding the area.
- It is slower to get to customers within the area. Therefore, cannot do as many jobs.
- Delays in getting to customers to complete works on their homes. Jobs take longer due to the closures and resulting traffic.
- Much harder to access some areas and some it is not possible.
- As a black cab driver, the scheme has had a serious negative impact on my business.
- Increased time getting to clients and suppliers. As a tradesman I've had to decline work where it isn't possible for me to get to the job site or have deliveries made.
- Increase in travel time, further miles covered & increases in fuel costs is not environmentally friendly nor is it the best use of our precious time.

- There has been no positive effect since the roads have been closed to my business.
- Less people use our shops as they can't be bothered to go round.
- It's harder to find my address when people are having to drive round in silly circles.
- No parking and one way system has made it very hard for my customer to come in the street and on my shop.
- My clients can access my business much more easily via bicycle, public transport, walking, or driving without all of the congestion along Gosset Street.
- My business is much more easily accessed due to the lack of through traffic in the area - my clients simply use their GPS and I have received no complaints. My business has increased due to its accessibility.
- Everyone is happier.
- It feels like a real community neighbourhood again.
- Clients report safer, cleaner and more pleasant journeys to and from my business. Place of work and work environment is improved by being cleaner, safer and with less anti-social behaviour.
- Staff cycle so it is more pleasant for them.
- I am responding as both resident and business owner. The whole area has been transformed for the better, which has encouraged more of our staff to both walk and cycle to work, and also to make more use of local facilities that are more easily accessed and are now in a more pleasant environment. Everyone at work has been very supportive of the Liveable Streets and horrified that any of this improvement could be undone.

Business responders who supported Option 2 provided the following comments.

- The scheme has not had a detrimental effect on our business.
- There is a stronger feeling of connection in our neighbourhood and people are more likely to walk to our café.
- The area and streets are calmer, quieter and the area looks better so our staff and visitors feel more positive about visiting our premises.
- A more pleasant area to bring my clients too, I am proud of the way the neighbourhood looks and feels now, it is a great improvement for Tower Hamlets.
- We look after properties across the Borough. In LTN areas we have seen the desirability and quality of living in those neighbourhoods radically improve. More of our staff cycle or walk to work. More work travel is completed on foot, bike, scooter or public transport.
- Per earlier response, our staff have all commented on an uplift in the local area when commuting to work and are more likely to go out for a walk / to shops at lunch knowing that they'll get some peace & quiet.
- As someone who has a business within E2 it is incredibly useful to have a space where the team can eat lunch, grab a coffee and make use of the extra allocated streets that where once run down by traffic. Making sure the team feels safe, we encourage our staff to walk to work through the areas that have been improved as we believe this is incredible relaxing and improves your mental & physical health. The reduced traffic makes the streets better to walk to work and safer when walking home in the evenings. It also has created areas that the team cherish during lunch breaks and after work. We hope the scheme is retained and we encourage more greener spaces and less roads!
- My team walk, use rail or cycle to get to work. They feel safer and are now more willing to walk. They are reflective of a younger generation hungry to see positive environmental change.
- No impact as my business is predominantly online,
- Clients are more relaxed - find the address easier and aren't intimidated by the traffic.

- The comments about the improvements to our area have all been positive and it is also positive that rather complain about a slightly different route to get to our business, they either find an alternative way, by public transport or walking, or just get on with it. Not one client has said why don't you change it back so all the roads around your business are congested again!
- All my clients visiting say how pleasant the area now is - they don't mind the small element of extra travel - they just accept London traffic.
- as a cyclist and walker, it's made working in the area so much safer!
- We occasionally use a vehicle to move items, but the inconvenience of doing so after the Liveable Streets scheme is nothing on the environmental improvements that the scheme has delivered. Please do not remove this.
- Our clients are Local Authority public sector clients, whom have been inspired by the lovable streets scheme and the area reflects our business values and aspirations for a greener London.
- It is a much more pleasant environment for clients to interact, and to meet with us in the business. The area is now a thriving hub of all kinds of people, not just lots of trucks and vans driving through, destroying the local community spirit.

DRAFT

Appendix C – Weavers Consultation results report

Executive Summary

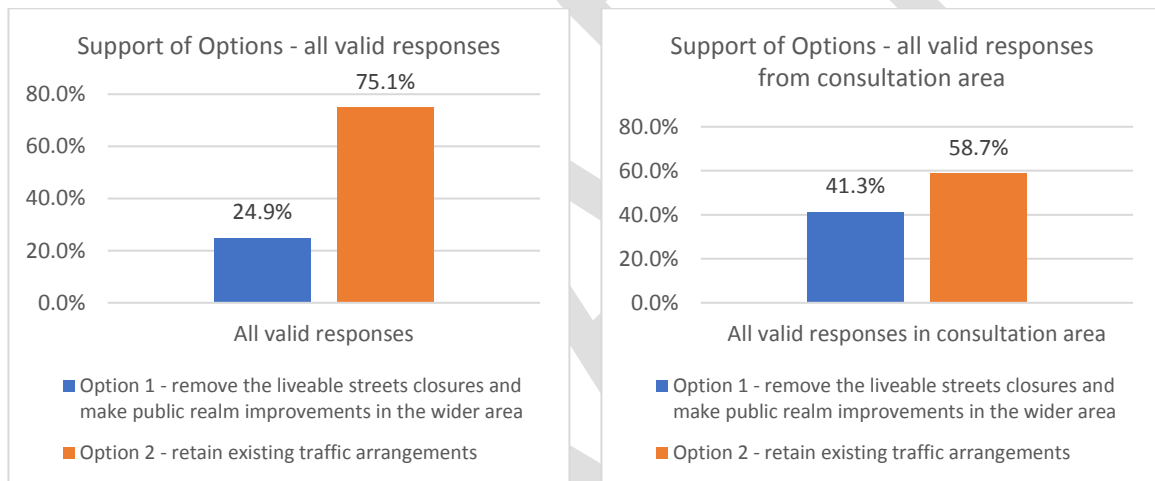
Analysis in this report includes the proportion of respondents who supported the two proposed options, and hereafter called Option 1 and Option 2.

- **I support Option 1 to remove the liveable streets closures and make public realm improvements to the wider area (Option 1)**
- **I support Option 2 to retain the existing traffic arrangements (Option 2)**

Survey responses have been presented in two ways:

- By all Valid respondents and
- By Valid respondents living in the consultation area.

The majority of valid survey responses were in support of Option 2, to retain existing traffic arrangements for both cases.



Background

The public consultation ran 23rd January 2023 and 12th February 2023 and sought view on options which have been developed for residents to consider. This report analyses the responses to the survey.

Responders were asked about their support for two options arising from the evaluation:

- I support Option 1 to remove the Liveable Streets closures and make public realm improvements to the wider area.
- I support Option 2 to retain the existing traffic arrangements

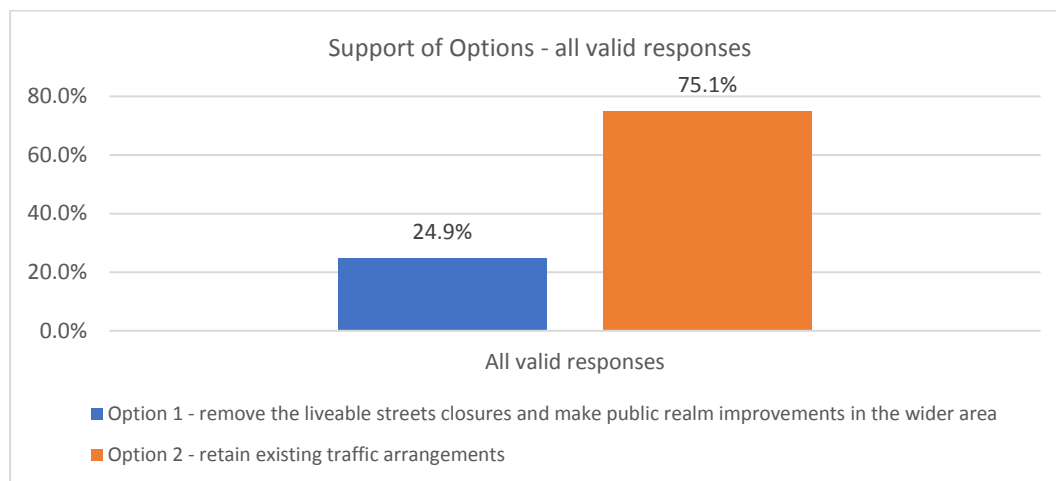
All responses

1,686 valid survey responses were received.

Of those, 123 were received online, and 1,124 were paper surveys.

Overall,

- Option 1 – to remove the liveable streets closures and make public realm improvements in the wider area received support from 420 survey respondents representing 24.9% of the share, and
- Option 2 – to retain existing traffic arrangements received support from 1,266 survey respondents representing 75.1% of the share.



Responses from the consultation area

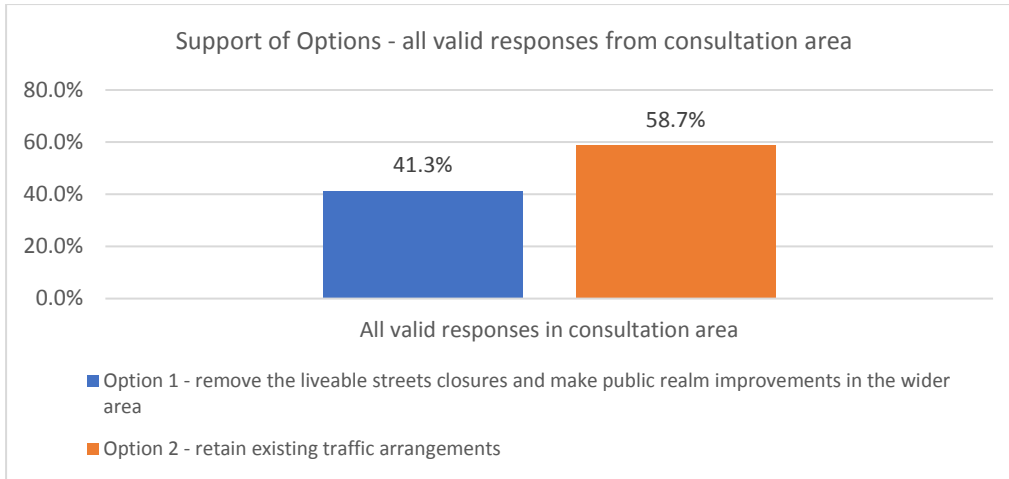
A unique reference number was provided in a letter and sent to all businesses and households within the Liveable Streets scheme area to help distinguish between those responding who may be directly impacted by the proposals.

To further ascertain whether these responses were genuinely received from respondents from within the consultation area, we checked the postcode provided by online survey responders with the postcodes held for the borough. We discounted a small number where the respondent provided a code but provided an address outside of the consultation area. The combination of the use of the resident code and a postcode from within the consultation area is how we have determined which response is from the consultation area.

In total 760 valid survey responses were from responders who used the resident code and provided a postcode that was in the survey area.

Of those,

- 314 supported option 1 – to remove the liveable streets closures and make public realm improvements in the wider area representing 41.3% of responses, and
- 446 supported option 2 – to retain existing traffic arrangements, representing 58.7% of responses.



Analysis

Analysis in this report includes the proportion of respondents who supported the two proposed options, and hereafter called Option 1 and Option 2.

- **I support Option 1 to remove the liveable streets closures and make public realm improvements to the wider area (Option 1)**
- **I support Option 2 to retain the existing traffic arrangements (Option 2)**

Survey respondents were asked which of the following best describes you? (please tick all that apply)

1,537 survey respondents described themselves as a resident and 108 described themselves as a business owner. 32 responses from business owners came from the consultation area. Of those nine supported Option 1 and 23 supported Option 2.

Residents were asked, to what extent do you agree or disagree with the proposed changes set out in Option 1

Most residents disagreed with the proposed changes with the exception of improvements to footways and crossing across the Bethnal green Area including dropped kerbs, continuous crossings and new zebra crossings.

Q5 (To what extent do you agree or disagree with the proposed changes set out in option 1:) Introduction of southbound vehicle access on the junction of Columbia Road and Gosset Street and two new zebra crossings	All valid responses	All valid responses in scheme area
Did not answer	2.2%	3.4%
Agree	24.1%	40.5%
Disagree	67.9%	46.8%
Neutral	5.8%	9.2%
Grand Total	100.0%	100.0%

Q5 (To what extent do you agree or disagree with the proposed changes set out in option 1:) Removal of closures around Jesus Green and new traffic movement changes to Delta Street, Wellington Row, Gosset Street and Barnet Grove.	All valid responses	All valid responses in scheme area
Did not answer	2.3%	2.9%
Agree	23.5%	39.2%
Disagree	70.7%	51.4%
Neutral	3.6%	6.4%
Grand Total	100.0%	100.0%
Q5 (To what extent do you agree or disagree with the proposed changes set out in option 1:) Removal of closures around Arnold Circus and on Old Nichol Street.	All valid responses	All valid responses in scheme area
Did not answer	2.0%	2.6%
Agree	23.7%	39.6%
Disagree	71.1%	53.2%
Neutral	3.1%	4.6%
Grand Total	100.0%	100.0%
Q5 (To what extent do you agree or disagree with the proposed changes set out in option 1:) Improvements to footways and crossing across the Bethnal green Area including dropped kerbs, continuous crossings and new zebra crossings.	All valid responses	All valid responses in scheme area
Did not answer	2.0%	3.3%
Agree	50.8%	52.5%
Disagree	33.7%	31.8%
Neutral	13.5%	12.4%
Grand Total	100.0%	100.0%

Evaluation of existing scheme

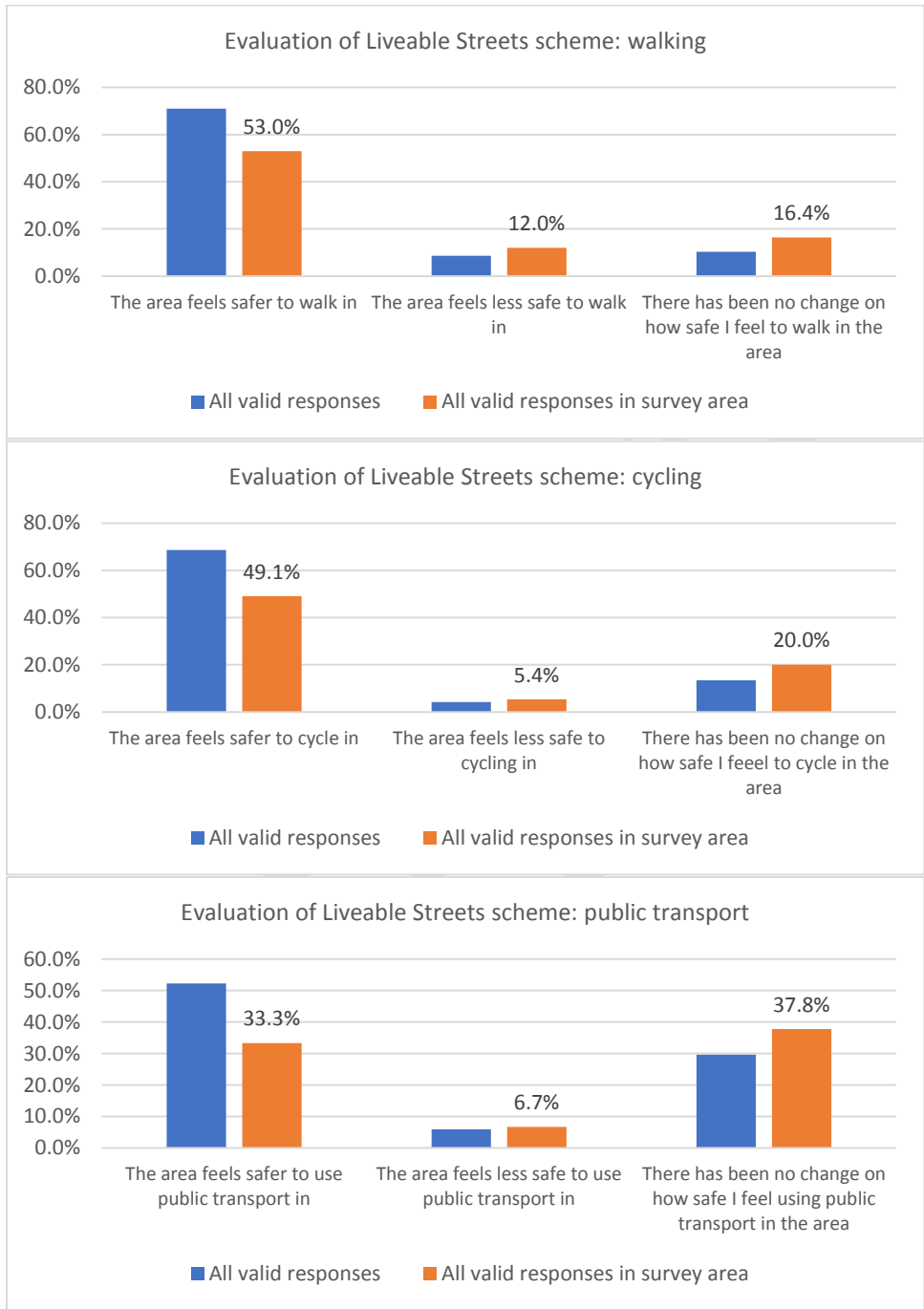
Survey responders were asked to evaluate the existing scheme. Responders were asked their opinion in a range of areas: Since the changes to roads in Bethnal Green were introduced under the Liveable Streets Scheme.

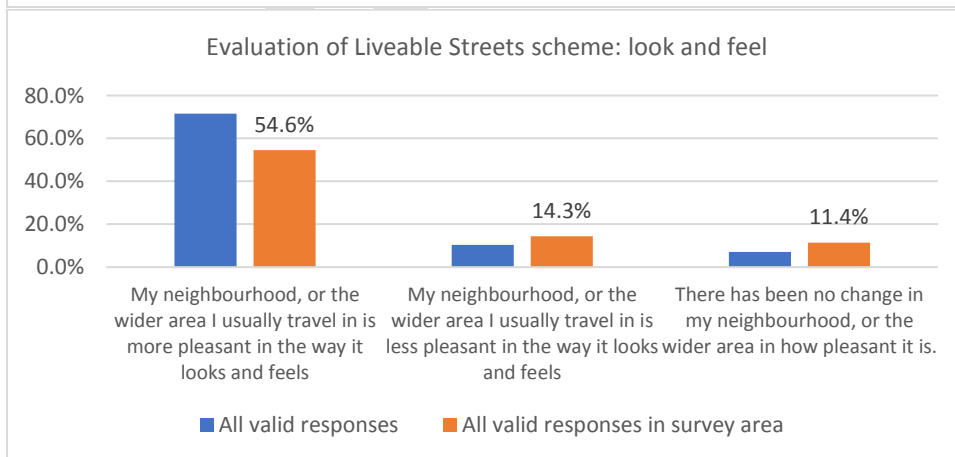
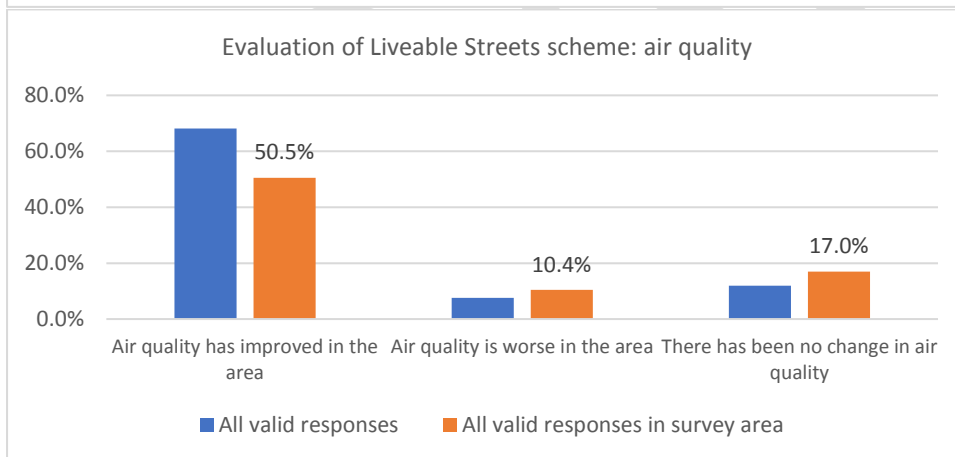
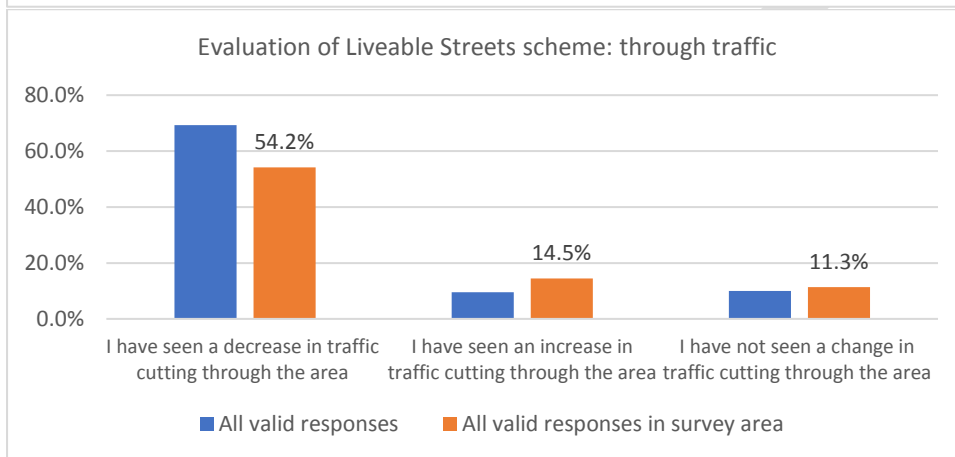
- Walking
- Cycling
- Use of public transport
- Traffic
- Access to shops and local amenities
- Air quality
- Traffic noise
- More pleasant neighbourhood

Overall, the majority of survey respondents reported positive effects since the introduction of liveable streets in all areas.

Most positive was around the look and feel of the area with 54.6% of respondents agreeing with this statement, and around the reduction in through traffic with 54.9% of respondents agreeing with this statement. The least positive was around access

to local shops or other local amenities where 19.3% of respondents stated that it has been more difficult to get to local shops or other local amenities.

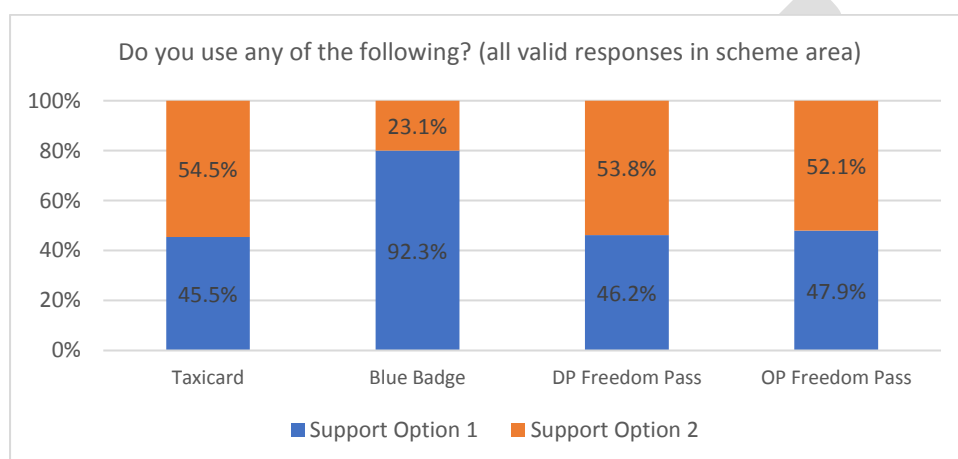




Travel Survey

Survey respondents were asked whether they used any of the following travel schemes?

In total 192 survey responders said that they use one or more of the following travel schemes: Taxicard; Blue badge; DP Freedom Pass; OP Freedom Pass and some responders made use of more than one of these schemes. This represents 11.3% of all survey responders.



Over 90% of respondents from the consultation area with a Blue Badge supported Option 1. Conversely, more than half of respondents with a Taxicard, a DP Freedom Pass or an OP Freedom Pass supported Option 2.

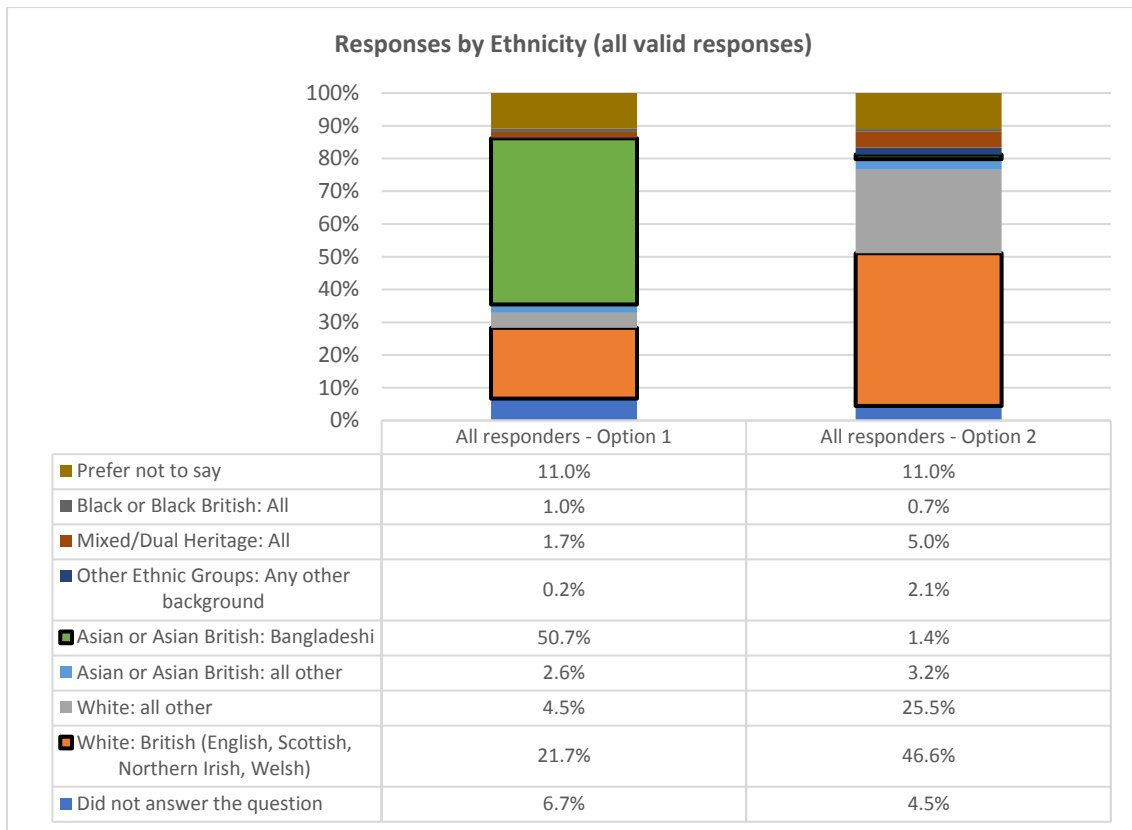
Equalities Analysis

Ethnicity

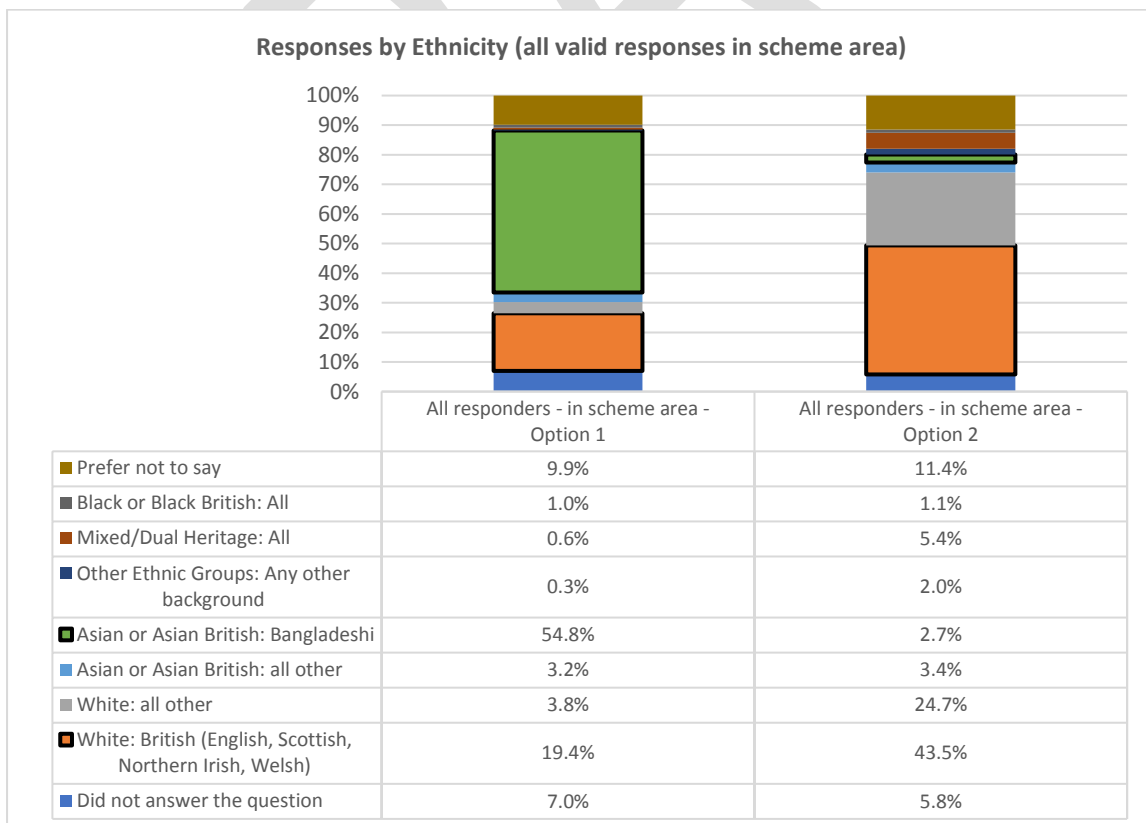
20.3% of all valid responses came from people who described themselves as White British. 13.3% of White British responders voted for Option 1 and 86.7% voted for Option 2. 33.6% of valid responses from within the scheme area were from White British responders and of those 23.9% voted for Option 1 and 76.1% voted for Option 2.

Responders from Asian or Asian British: Bangladeshi backgrounds accounted for 13.7% of all valid responses. 93.4% of Bangladeshi responders voted for Option 1 and 6.6% voted for Option 2. 24.2% of valid responses from within the scheme area were from Bangladeshi responders and of those 93.4% voted for Option 1 and 6.6% voted for Option 2.

The table below show the proportion of total valid responses received by ethnicity and support for each option.



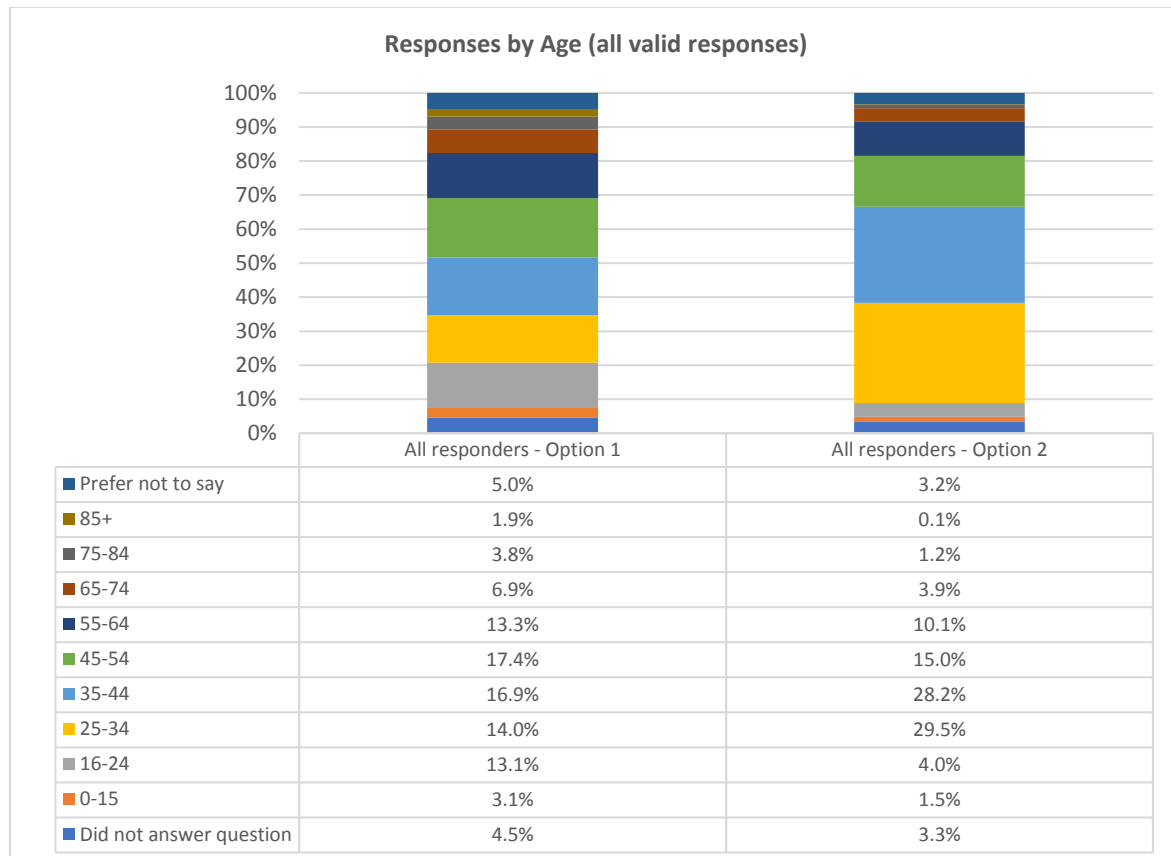
The table below show the proportion of valid responses received from responders living in the scheme area by ethnicity and support for each option.



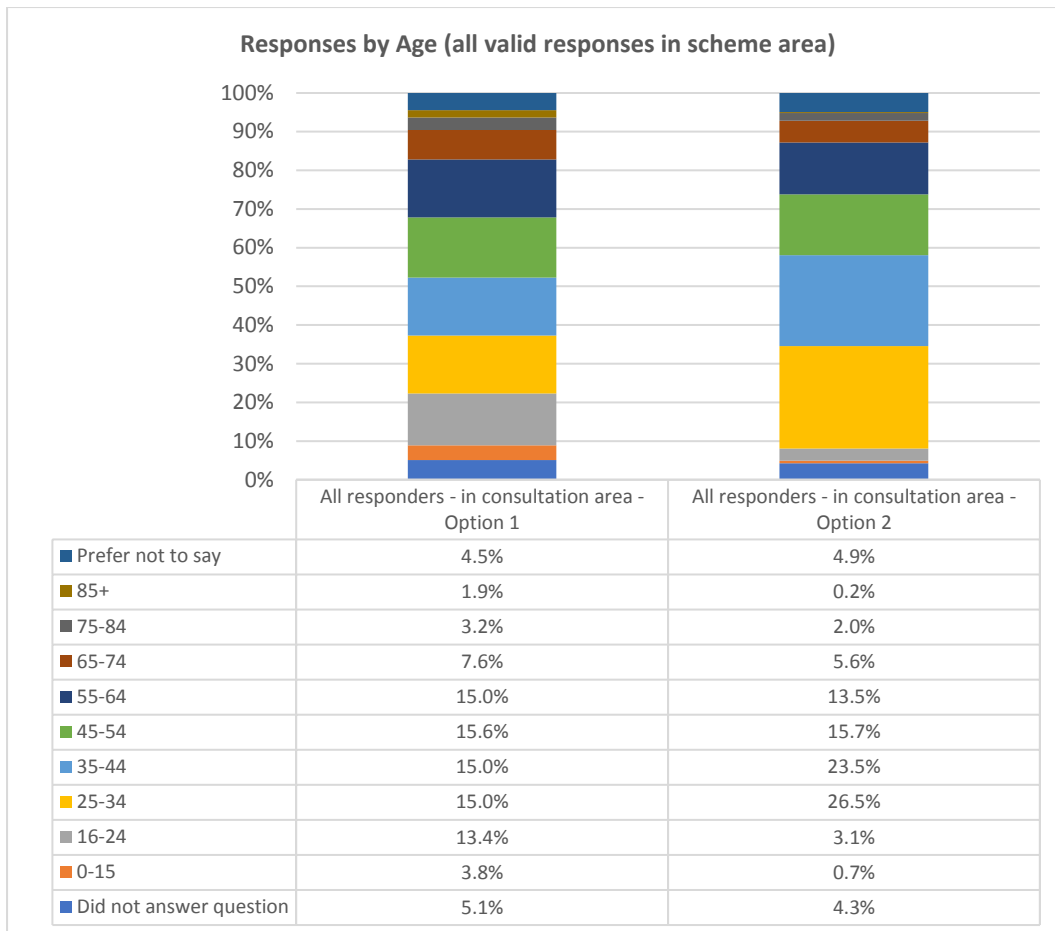
Age

The majority of respondents are of working age. Respondents aged 0-24 years are more supportive of Option 1. Respondents of working age (25-54) are more supportive of Option 2. Respondents who are aged 55 years and over are more likely to support Option 1; this age range is more likely to have a disability or mobility issues than other age ranges.

The table below show the proportion of total valid responses received by age range and support for each option.



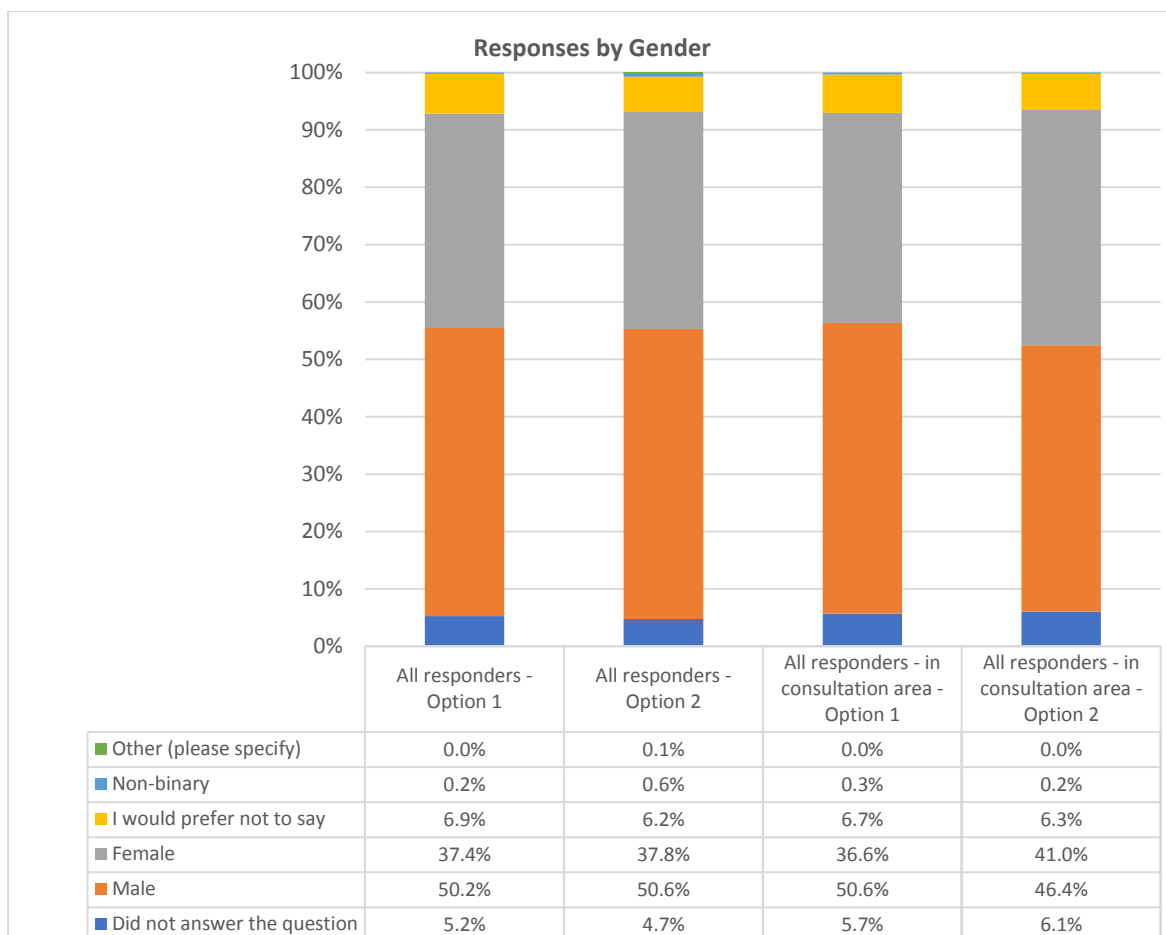
The table below show the proportion of valid responses received from responders living in the scheme area by age range and support for each option.



Gender

Survey respondents were asked which best describes their gender. There were more male survey responders than female (50.5% compared to 37.7%). Female respondents from the consultation area are slightly more likely to be in favour of Option 2 than males (61.4% female, 38.6% male).

The table below show the proportion of valid responses received from responders living in the scheme area by age range and support for each option.



Gender same as registered at birth

85.5% of all survey respondents said that their sex was the same as registered at birth and a further 13.9% said either did not answer the question or said they would prefer not to say. Less than 0.5% of survey respondents said their sex was not the same as registered at birth; for this group, support for Option 2 was higher than for Option 1.

Sex registered on birth certificate

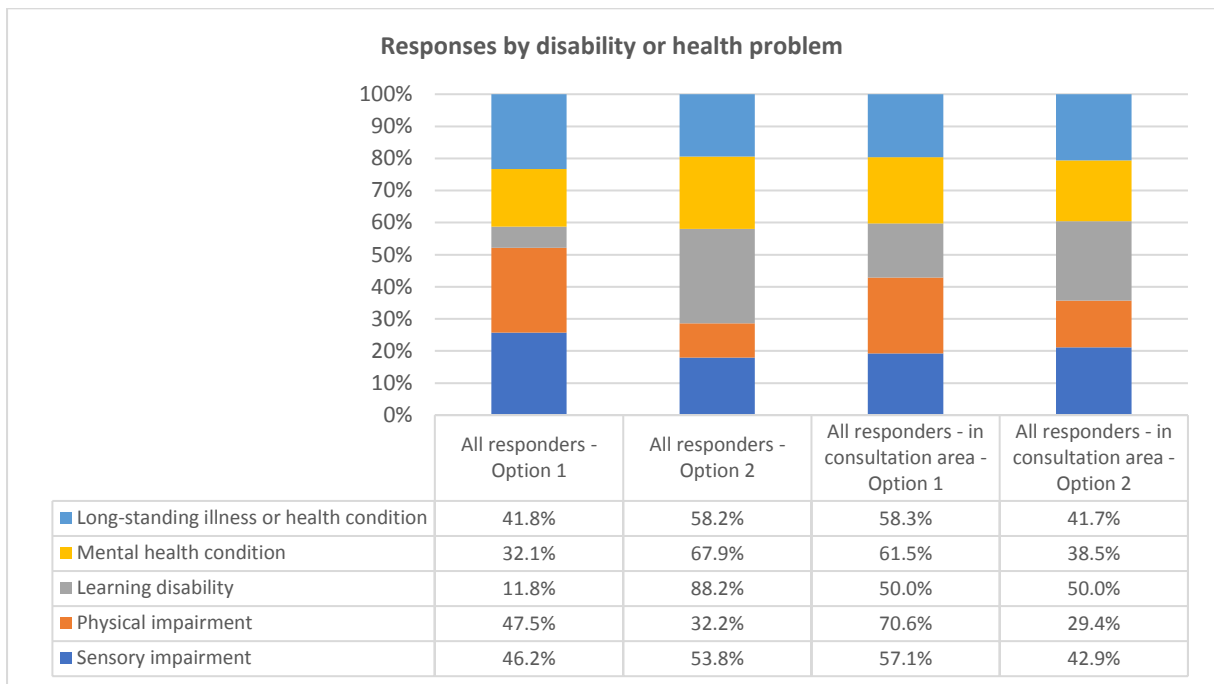
The responses for this protected characteristic for male and female are comparable to the question about gender. Fewer than 0.5% of survey respondents said they were intersex. In this small group, there was more support for Option 2 than for Option 1.

Disability

178 (10.5%) of all respondents and 92 (12.1%) respondents in the consultation area said yes when asked are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months (include any problems related to age).

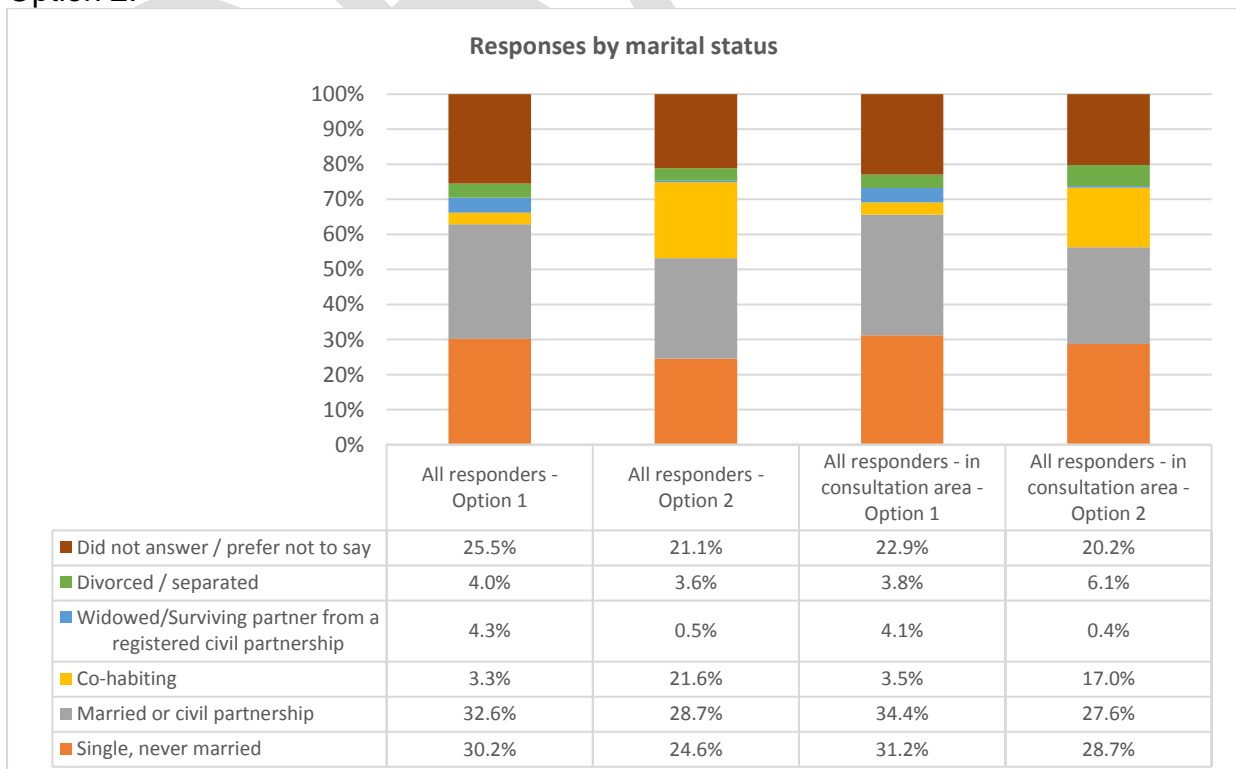
Respondents were asked to state the type of health problem(s) or disability(y/ies) that applied to them. Respondents with a sensory impairment, learning disability,

mental health condition or long-term health condition were more in favour of Option 2 than Option 1. However, the proportion of respondents from the consultation area were more supportive of Option 1 than 2.



Marital Status

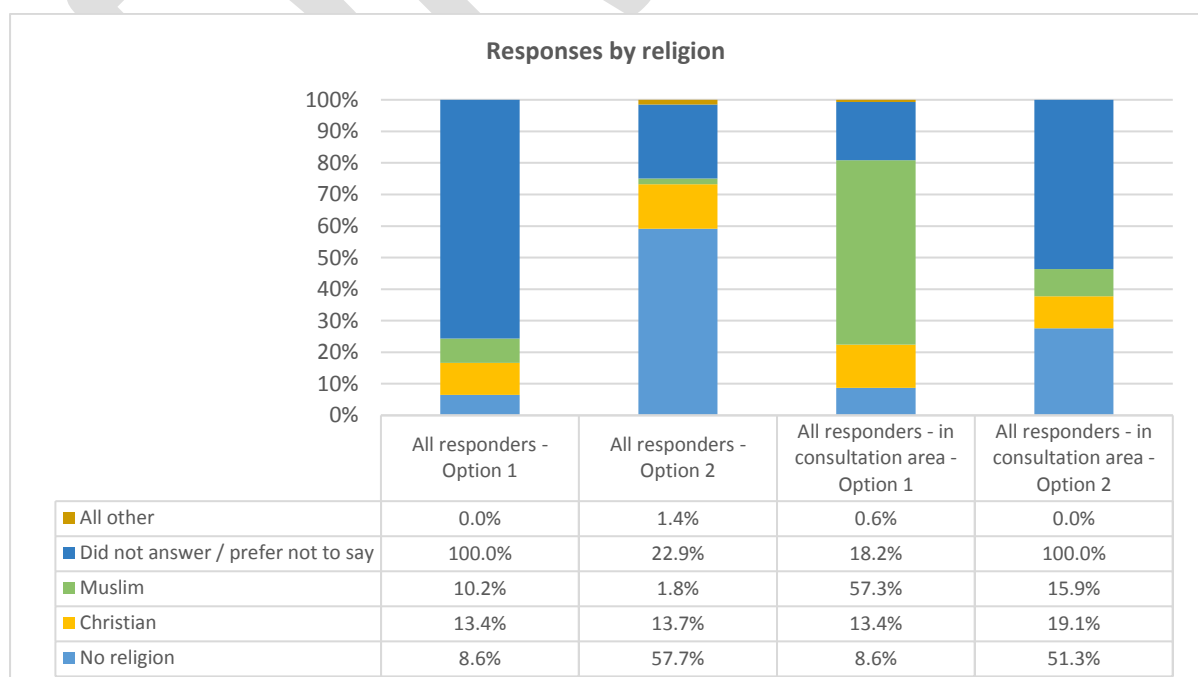
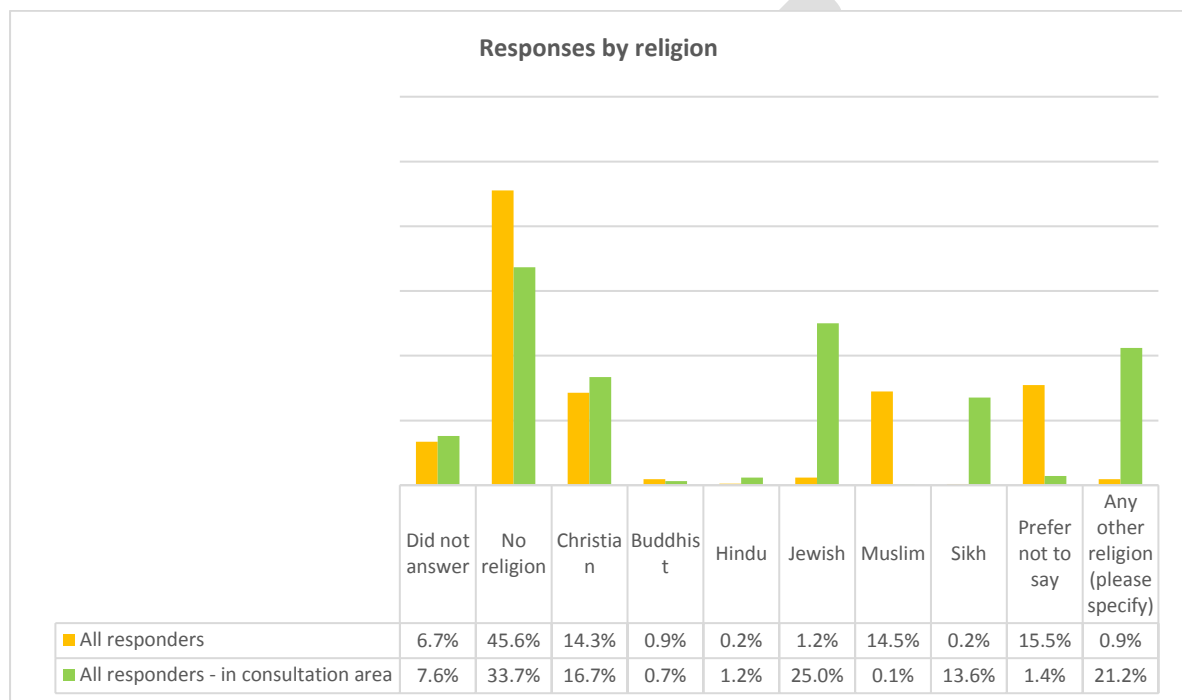
Respondents who are widowed / surviving partner from a registered civil partnership were more in favour of Option 1 than Option 2. All groups were more supportive of Option 2.



Religion

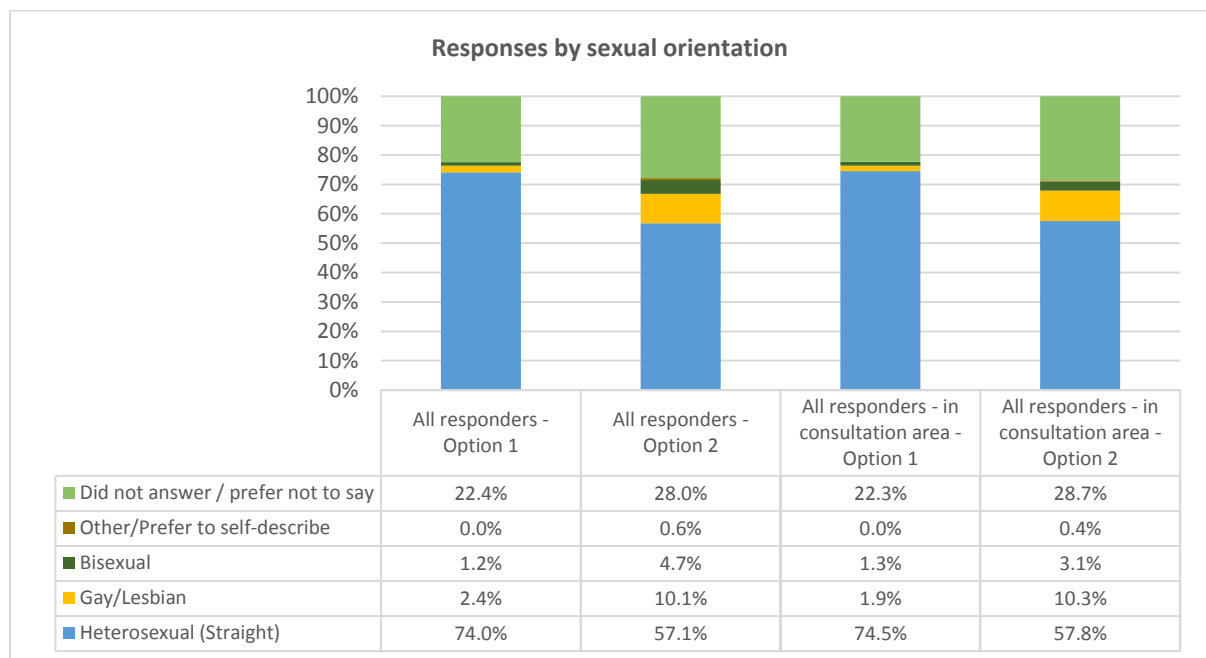
1,142 respondents stated they had no religion, or preferred not to say, or did not answer this survey question, equating to 22.2% of all responses received. The majority of these responders supported Option 2.

The next highest group was from respondents who said they were Muslim. Muslim respondents were much more likely to support Option 1 than Option 2. The third highest group was from residents who said they were Christian. Overall, Christian respondents were more likely to support Option 2.



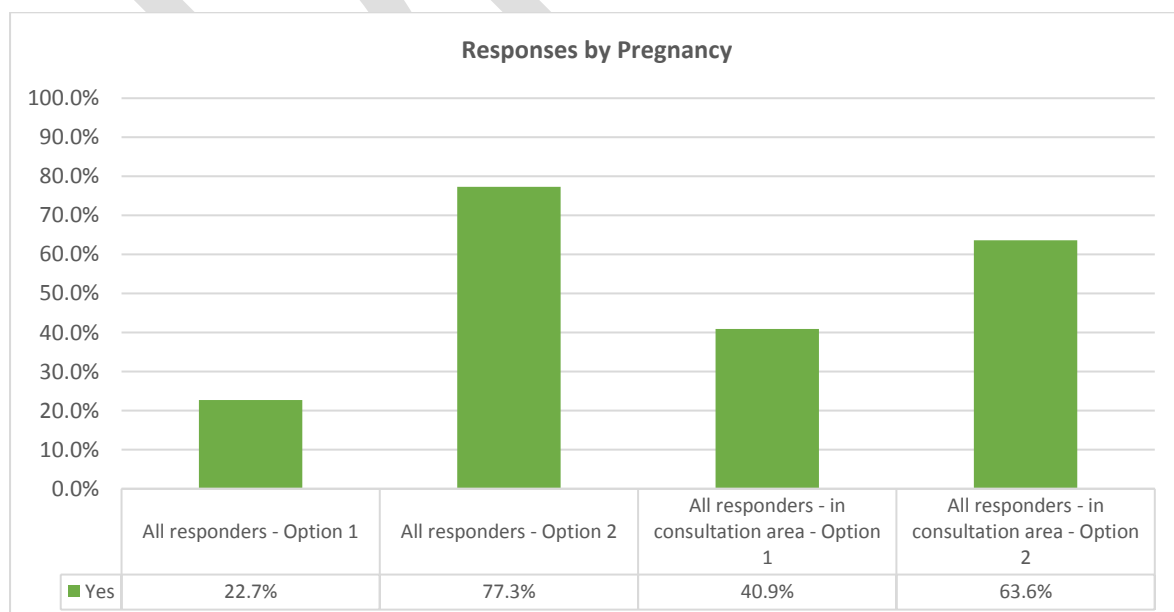
Sexual Orientation

26.6% of respondents either did not answer this question or preferred not to comment on their sexual orientation. Of the remainder, 83.6% of all survey respondents identified as heterosexual / straight and that rose slightly to 87.5% of survey respondents in the consultation area. A higher proportion of LGBT survey responders supported Option 2 than those identifying as heterosexual / straight.



Pregnancy and Maternity

44 or 2.6% of overall survey respondents said they were currently pregnant or had been in the past year. Of those the majority were more supportive of Option 2 than Option 1.



Free text comments

Survey responders were given the opportunity to provide detail to supplement their survey responses. 954 comments were received – 208 from respondents who supported Option 1 and 746 from respondents who supported Option 2.

Comments from respondents with a disability or long-term health condition

104 comments were provided by survey responders with a disability or long-term health condition.

43 comments were provided by respondents with a disability or long-term health condition who supported Option 1. Their comments referred to the following themes.

- More crime / ASB since scheme was put in place. Easier for criminals to escape on smaller modes of transport. Creates space for young people to hang around.
- More difficult to get to where I want to go. More difficult for people to get to me, including hospital and other appointments.
- Created congestion, particularly just outside of the scheme area.
- Feel less safe if there is an emergency and I can't be reached easily.
- Not safe for children who are playing in the roads.
- Emergency services and large vehicles are getting stuck – three point turns etc.
- Carers refusing to do pick up and drop off because of traffic.
- I'm confused about how I can get around the area.
- Difficulty getting taxis.

61 comments were provided by respondents with a disability or long-term health condition who supported Option 2. Their comments referred to the following themes:

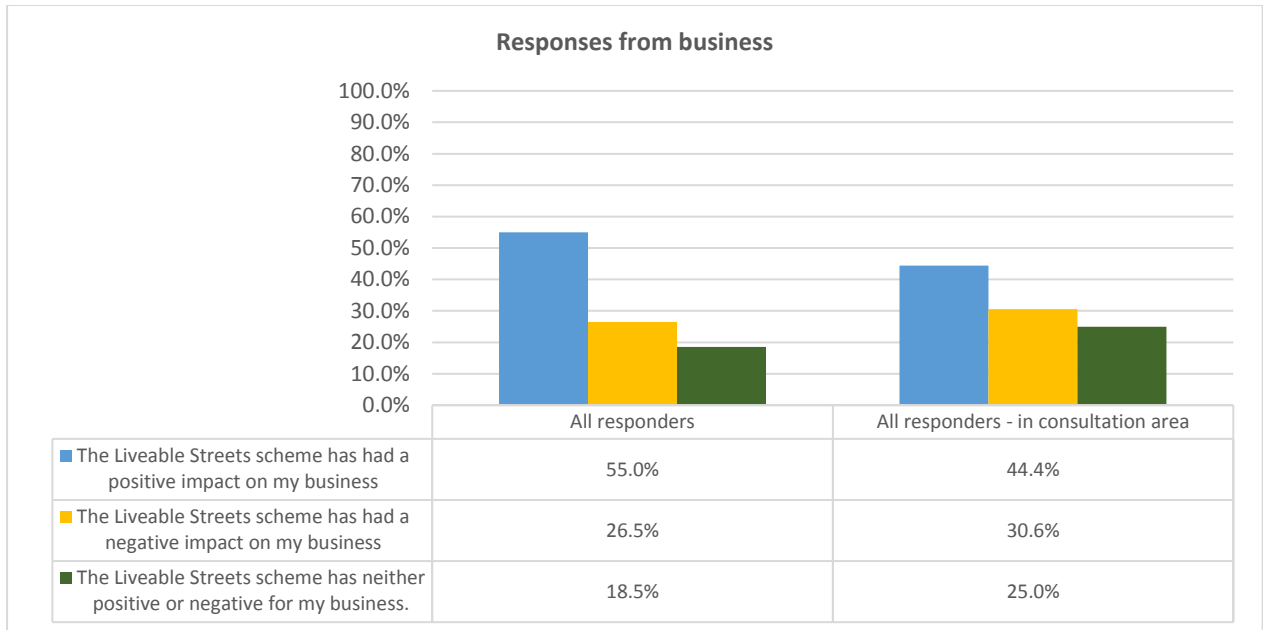
- More pleasant
- The area feels safer to travel around.
- Less traffic pollution.
- Less traffic noise and night-time noise.
- Better for my Asthma
- Much easier to walk around the area.
- Much easier to cycle around the area.
- Children are enjoying a calm, healthier and safer walk to school.
- Do not waste money changing the scheme.

Comments from business respondents

The consultation asked respondents whether they were responding as a business or owner of a business in the area. 151 of all survey respondents said they are a business owner, representing 8.9% of overall respondents. 72 respondents from the consultation area said they were a business owner (9.4% of all respondents in the consultation area). Overall 55% businesses said that the Liveable Streets scheme had had a positive impact on their business (or 73.5% when combined with those

who said there had been neither a positive nor negative impact on the business). The percentage of businesses responding from within the consultation area who said that the Liveable Street scheme had had a positive impact on their business was lower at 44.4% (or 69.4% when combined with those who said there had been neither a positive nor negative impact on the business).

The majority of business responders who felt that the scheme had a positive impact on their business were supportive of Option 2. The Majority of business responders who felt that the scheme had a negative impact on their business were supportive of Option 1.



Business responders supporting Option 1 provided comments on issues around increased time getting in, out and around the area; increase in journey times; more thefts and ASB; more complaints from customers; interrupts deliveries from suppliers and some suppliers won't deliver anymore.

Business responders supporting Option 2 provided comments on issues around being easier to travel around by foot and cycling; being more peaceful and enjoyable; less pollution and noise; larger footfall; less traffic cutting through; most people don't own a car; no scientific fact for removing scheme; and waste of taxpayers' money.

Comments from respondents with a disability or long-term health condition - all

Option 1

- I feel less safe if emergency vehicles cannot reach and it is really dreadful to read the constant complaints from residents on social media
- My sister lives in Wimbolt Street and I sometimes have to be her carer, e.g. getting shopping. I also run a small business and deliver goods to a shop in Columbia Road. The measures have made it extremely difficult to access the areas. In addition, it has doubled my journey and increased the traffic on the main roads and I often having to reverse and do three point turns to navigate the few roads that can be used.
- Hackney Road is one big traffic jam. I have family in Wellington Row and have to take a much longer journey to visit them. They have complained about emergency vehicles getting access and an increase in drug dealing and antisocial behaviour
- I am a resident and a business owner on Columbia Rd. Although there is less traffic in the immediate streets where liveable streets has been implemented I know that this has impacted massively on the surrounding streets with traffic always at a standstill on Hackney Road causing more pollution for the whole area in general. More people have been impacted negatively because of traffic clogged polluted streets than the few who live in expensive houses, now on quieter streets. It has very much segregated a community. Delivery companies now hate delivering to my business on Columbia Road because of the surrounding gridlock. We have to pay extra transit costs, costing my business extra expenses. This has been a very poorly executed and expensive exercise.
- More pollution with trucks reversing and doing 3 point turns. Taxis won't come to my area. Deliveries won't come to my area. Emergency services take longer. Main roads far more congested. More noise with cars and trucks reversing and doing 3 point turns
- More pollution on main roads.. Difficulty when booking taxis. Deliveries unable to navigate closures. Large trucks getting stuck and blocking all roads. Emergency services experiencing difficult accessing. Sundays are impossible to get in and out of area due to market. Visitors abandoning cars as can't navigate the closures. Traffic doing 3 point turns and reversing both dangerous and adding to pollution.
- Incredible increase in drug dealing, car break ins. Streets unsafe for women.
- Children are playing on the roads. It's not safe for children. Children should be playing in the parks not on the roads. Roads are for Motor Vehicles and cyclists.
- I don't like the look and feel of the liveable streets in my area. There is more pollution.
- Access is impossible
- Difficulties for emergency services & public transport access. MASSIVE increase in anti-social behaviour and DRUG DEALING. These people know the authorities have no quick access to their criminal activities.
- The access to the area has become impossible: deliveries, taxis are finding it difficult to access the area. I do not drive but I have to use taxis occasionally. Those planters you use to block the roads off are ugly and ridiculous
- The road closures have not helped in any way, emergency services and large vehicles get stuck at the end of Wellington Row and many cars have been damaged. We are having to drive more due to the closures and Warner Place has terrible congestion
- Each closure or reinstatement requires individual consideration.

- Since this change, I found it confused at finding a way to get to my usual destinations due to blocked roads and one-way roads. The journeys took longer become all cars have been diverted to either Bethnal Green Rd or Hackney Rd.
I even got fined twice for passing a road with no blockade but a cctv camera
- For me it has become more difficult to get to my destination with, ie, shopping, school run, friends and family visiting, it is generally more time consuming, more difficult and stressful not having the access we had before.
- The closures are causing additional traffic on certain roads, including the road in which I live. It is making it harder to get to hospital appointments on time. Main roads are heavily congested. I am finding it more difficult to organise disability transport as a result of the closures as many carers are refusing to collect me for my hospital appointments due to the closures. Please remove them they are making my life impossible to be a part of the local community.
- Please don't remove the Bollards in Pelter street. They was put there for the druggies that you used to hang alert and come racing around
- There has been more congestion and more pollution. More noise as traffic is held up and have seen many people get out of cars and fight as tempers fray. There is continuance noise of honking where traffic has increased on Virginia road and Swanfield street, it is dangerous to cross the road specifically at school times. Please reopen old bethnal green road. Please allow access to Gosset street. It's not fair to residents to make an open air extension to the birdcage pub at public expense.
- The reduction in traffic and associated police patrols has resulted in an increase in street-side anti-social behaviour
- There is an 80% increase in traffic on swanfield st as you state. it is more dangerous to cross the road, it is noisier
my bus journeys along Hackney Rd now take much longer
The frequency of buses from Hackney Rd to Old St and Shoreditch High St is poor now as buses are congested on Hackney Rd
- It's just made it more difficult to set in and out of the area, especially for deliveries and taxis who don't understand the system
- More traffic jams, more cars, ambulances, Police and the brigade have difficulty getting through from the road closures, absolutely appalling more dangerous to public and motorists.
Just return and make our streets easy to walk, drive and have access too. These new closed roads are more dangeous.
- Too much traffic on squirrels street difficulty in crossing the road to much noise and air pollution
- I feel traffic is more congested and as a carer for my grandchild who I have to pick up and take to school - it take me much longer even if i lose public transport
- Why is part of columbia road 'one way' and the rest 'two way'? It's impossible to drive to Bethnal green because of these road blocks and the one way system of columbia road (I am trapped in my area and cannot drive to the shops on bethnal green. It's one way in and one way out because of these ridiculous entrapments to our area.
- Increase in anti social behaviour and concentration of drug dealing particularly in the area by the Birdcage pub at the junction of Columbia Road/Gosset Street.
There has been an increase in e-scooters and e-bikes making it more unsafe for pedestrians.
Access to the Jesus Hospital Estate would be improved if Ropley Street was mad one-way southbound.
- More traffic on hackney road and more congestion on hackney road. More pollution on hackney road.
- The surrounding area is more congested, cars used more as it take longer to reach Destinations

- More through traffic and noise on the street I live in. More congestion on main roads. Difficult to access London Hospital for appointments. Added travel times on public transport.
- The surrounding area is congested
- I cannot get from places I go to quickly, as roads are closed/blocked. This is terrible as my self and sons need urgent medical care at times and there's no quick route to get home in these times as blocked roads and you end up sitting waiting. Traffic build ups. Cars are left running so fumes get out making the air worse. Also I don't feel safe walking on roads where there are no cars as I feel vulnerable to being attacked or robbed.
At least if cars where about you actually feel safer.
It unfair for the disabled who cannot walk far due to Ill health
In getting around. You have widened pavements in Bethnal Green road and the shops have extended their wares matching the road congested at busy times.
This is terrible for mobility scooters and wheelchairs
I do not see why you have to change anything, if you live in a city that's how it is.
- As a disabled driver it had made it worse for me with all these liveable street scheme as it is now taking me longer to get to appointments or shopping as most of the roads are closed off. I would really like it to go back to how it was before these closed road were put in place and traffic flowed easily
- Closing of roads has made travelling really difficult, it has made us feel less safe walking as well, and doing things like shopping. An adjacent road now requires a 10-15 minutes drive, more petrol being used up.
- Area has increased ASBO and drug use
- Forcing us to go in the opposite direction, onto Hackney Road to get to Bethnal Green is total MADNESS.
Extra time and extra petrol being used, as well as all of the extra traffic causing chaos on Hackney Road.
- PLEASE PLEASE PLEASE
Get rid of this stupid scheme. You just made this 100 times worse, I need my car daily for my work amount of traffic you guys caused is ridiculous. Do us all a favour leave us alone and return all our roads ip again. If you wona live car free, clean air no noise more friendly environment then please then get lost of tower hamlets and move out to a country side
- When visiting relatives in the area I have noticed an increase in ASB and the litter they leave behind
- The area is now divided
The changes have made most working class people's lives intolerable
- Traffic is just pushed to surrounding areas creating more disruption and pollution and not a nice experience
- Getting about and getting access difficult
- The area feels less safe. There is less police presence. More dirty as well
- Journeys that used to take 2 minutes before now take 10 minutes. Get rid of liveable streets.
- It's difficult for disabled people like myself who have mobility issues and who rely on a car for transport. Journey times have significantly increased. Coming in and out of Ropley St is absolutely ridiculous.
- Anti social behaviour has risen/ drug dealing/use is more common and openly doing this in public view of children
- The liveable streets scheme has made it considerably more difficult to travel around the local area and into tower hamlets. I have a child with a blue badge and have mobility issues myself so using the car is our only option for certain journeys. It has made accessing appointments a lot harder and I have been late or had to cancel appointments due to not being able to access because of the traffic I am faced with

on Hackney Road, which is gridlocked most of the time due to the closures. I have to go round in a huge circle to access my own borough, meaning I'm driving more and idling in traffic more, defeating the purpose of the liveable streets scheme.

- I have a blue badge and can't use public transport. Its hard for me being stuck in traffic a lot and I can't get to my appointments on time.
- The number of cyclists makes it difficult to cross the road, alot of on pavement cycling. Electric bikes are fast and silent. Nearly been knocked over a few times when on foot.
- The Ltn has caused a major disruption to my daily life it has become more harder to get to places on time often delays has made no significant changes delivery drivers have had nightmares to get around. It was a waste money that could be well spent elsewhere
- Too much traffic. Problem going to hospital and see GP and dentist. It take long time to travel because of road closed. Hackney Road is very very busy. It take 30 to 40 minutes to travel.
- It now takes at least 20 minutes to get to doctors surgery. used to be less than 3 or 4 minutes. My daughter has to drive into Hackney Road which is often solid traffic (causing more bad air) before going back on ourselves through warner place (poor people living there!) to head towards Bethnal Green.
- The congestion and traffic fumes have increased in other areas (which are also residential) It is ridiculous that emergency services and people who are less able bodied have to go all round the houses to get from A to B
- Emergency services must be listened to. Vulnerable residents are suffering.
- Please open our streets, this is london not amsterdam.
- Traffic increased. Hassle making small commutes
- The closures are causing additional traffic on certain roads, including the road in which I live. It is making it harder to get to hospital appointments on time. Main roads are heavily congested. I am finding it more difficult to organise disability transport as a result of the closures as many carers are refusing to collect me for my hospital appointments due to the closures. Please remove them they are making my life impossible to be a part of the local community.
- More cycle lanes have been introduced in Columbia Road. Two way cycle lanes. It is difficult to walk or cross the road because of cyclist zooming past fast both ways. Cyclists can hit or injure pedestrians if there are no restrictions on them. Being injured by cyclist can be fata. There should not be two lanes for cyclist on Columbia Road.
- I am disabled
No one considered our needs
they just went ahead
- there is a lot more traffic. Parking spaces are much harder to find.
- More drug dealers and drug abuse as roads are easier for them to escape police. Air pollution pushed to other areas.
- Because of road closures you have to drive all the way round in order to get to our home, Thus this causes more traffic and more pollution. So spending more money on fuel and because of energy crisis, we have no cut back.
- There is far too much traffic and just feel congested. A lot more difficult to get to places and alternative routes just leads to traffic jams which stuck in forever
- Change have made cars having to go to Hackney Rd on Bethnal Green Rd where traffic is so busy at all times now what journey would 10 mins takes 20-30 mins
- Licensed taxis (black cabs/hackney carriages) based on their legal status are a form of public transport, and as such licensed taxis and their drivers are subject to a different legislative scheme from private hire vehicles, which are not a form of public transport, and not authorised to ply for hire. Within the Regulatory Framework, licensed taxis provide a service which supplements the existing modes of public

transportation and which, in some ways, can arguably be assimilated to a universal public service. Being able to hail a taxi from the street or to pick one up from a cab rank is an essential alternative to other methods of transportation available. The requirement to be able to hail safely and conveniently is of particular significance for disabled persons, who may find it more difficult than non-disabled persons to spot taxis and to attract their attention. It is also of particular relevance given the stringent accessibility requirements to which taxis are subject – including the requirement to be able to accommodate a standard-sized wheelchair. We would urge you to ensure that the role of publicly hired taxis is recognised in the Traffic Management Orders (TMOs) and essential access for taxis is maintained. The TMOs should be clear and unambiguous in setting out the circumstances under which taxi access will be permitted, to ensure that taxi drivers are clear on what taxis can and cannot do and drivers do not encounter problems. This should also be made clear with appropriate signage and any enforcement measures in place must account for taxis requiring access. Licensed taxis (hackney carriages) are recognised as a safe and quick way of making door-to-door journeys, and the 100 per cent accessible fleet is essential for disabled people at times when other public transport is scarce, does not result in a door-to-door journey or ceases to run at full capacity. Southwark, Hammersmith & Fulham, Kensington & Chelsea, Wandsworth and Greenwich all give unrestricted access to taxis (black cabs) in their schemes and we encourage Tower Hamlets to do the same. You also have omitted from the list of travel modes Licensed Taxis/Black Cabs which are public transport and not cars so this should have been included as the monitoring is supposed to be separated.

- Very difficult to as well as four public services classed as ambulances found it very difficult to access all areas. Same for elderly people in wheelchairs have been very difficult for them to get access.

Option 2

- I truly believe we all have to make some sacrifices for the better good - if we can reduce car dependency by making streets the best they can be for cycling and pedestrians people will change their habits.
- Traffic and parking has increased on Columbia Road. Ropley Street should be closed as this is just used as cut-through my drivers passing through.
- Arnold Circus in particular has become a much more pleasant place to walk or cycle through: it would be a backward step to restore it as a roundabout
- It is much safer and friendlier for children walking and cycling to school
- I think the Liveable Streets proposals have improved the environment by reducing traffic volume, noise and pollution. These improvements have benefitted residents rather than rat-running drivers who do not live in the neighbourhood or Tower Hamlets.
- Safer for children
- Generally feels safer and more pleasant to walk around the Old Bethnal Green Road area
- It has made it better to live in and visit.
- There improved vibe to the area now that pedestrians and cyclists are being prioritised. There has been a big increase in children cycling in the area/to school which is a positive life change we want to encourage in terms of improved health outcomes for individuals and improved air quality which is better for everyone. The local resource of Arnold Circus open space is much more accessible for children to play without the need to cross a road being used by buses and cars. In an area such as Bethnal Green where access to open space is at a premium this is a benefit that should not be lost.
- The precedence given to cars has been reversed in favour of people.

- Just a nicer place to live, we don't need more traffic clogging up this part of the city.
- The changes have been great. Please don't remove them.
- It has been good to see some modest attempts to improve walking and cycling in a borough which is dominated by motor traffic and quite resistant to limiting this. I don't understand why further improvements can only be made by ripping out the new works. The Borough must know that active transport needs to be encouraged in order to improve the safety of those outside cars. Air quality needs to be improved, as does the health of residents in a place where the majority do not have access to a car. This can be partly achieved by making it easier to cycle and walk.
- Liveable Streets is a great and important scheme to improve the area and planet for us all, please keep it and add to it.
- Much more enjoyable to be on those streets now, cleaner air, more sociable.
- Worried that motor traffic will return as previously. A bad mistake.
- The improvement to Arnold Circus for residents has been absolutely dramatic. Please don't remove this successful new infrastructure. Please engage and improve where there are problems.
- The area has improved dramatically especially for visitors to Arnold Circus and Columbia Road. The non implementation of the closure of Virginia Road has resulted in a rat run along Swanfield Street. It is not easy or safe to cross at the junction with Chambord Street and a crossing is needed.
- The area feels cleaner, calmer, safer. There is clearly less traffic leading to less pollution. This is great, especially when considering where Tower Hamlets ranks in amongst London boroughs for cleanness and healthiness.
- Much less drug dealing evident in our local area
- What has been done around Arnold Circus is all good. The area is more like when I first knew it, when kids played in the streets and neighbours met there. The improvements need to be extended to Redchurch Street and Chance Street which still suffer from excess vehicle traffic, noise, pollution and danger to pedestrians.
- As an elderly resident with asthma I fully support the liveable streets scheme and the improvements to streets and air quality in an around Arnold Circus.
- Greener, more pleasing to look at, less litter, fewer people hanging around
- More chaotic
- I have increased how often I visit the area and its shops thanks to the much improved environment.
- It's more of a community
- There has been little impact in my immediate postcode area but safety for schoolchildren has improved in all areas and this takes precedence over any ease of traffic issues.
- Nothing more to add, it's just better and healthier in my assessment.
- much more pleasant to walk/cycle in the wider area
- its a pleasure to walk in the area, to visit local shops, in safety, things I would never have done before!
- The area has improved enormously. I have lived on the corner of old Nicole Street and club Road for 22 years. And until the restriction of traffic around Arnold Circus, the streets have become a traffic through run, very noisy and polluted, especially with the growth of the nighttime economy. The restriction of traffic around Arnold Circus has been of enormous benefit to the area in so many ways noise, environmentally, a reduction of antisocial behaviour. It would be a hugely regressive state to open it up. I cannot believe the council would sanction that.
- The liveable street programme is the best thing that has happened in the area for many years. It puts people back at the forefront rather than cars. We are not able to meet and interact with neighbours in the street, it is much safer for children to play and for an older person such as myself with mobility issues it is much easier and

safer for me to get about. Prior to liveable street its often used to take me up to 5 minutes to get the chance to get across the Gossett St rat run because of the non-stop stream of traffic. Liveable street should be retained and extended to keep through traffic out of residential streets and to reduce car usage and ownership within the borough street are for the people

- There are more children playing in the green spaces, and more children cycling. The planters give the area a more pleasant appearance.
- The air feels less polluted also surrounding much brighter.
- There is no longer visible drug dealing from cars on Chambord Street / Virginia Road. It is a quieter area - sirens have diminished. There is less aggression in the area as there are fewer cars. The area feels so much safer for walking around day and night. There is a much happier atmosphere - even although the crowds shopping and socialising on Columbia Road are much bigger.
- I really like the current road layout. There are things that could still be improved eg finishing off the original plan but to return to all the through traffic would be a big mistake
- The night time noise, traffic and pollution greatly reduced since the implementation of the liveable streets in my area.

The fact that arnold circus is no longer a traffic zone has made an enormous improvement to air pollution and general well being for residents especially for the school and now the children can enjoy the space and garden without danger from cars.

- I live on Columbia road at the Shoreditch end. There has been a huge improvement in the way the area feels. It is so much easier crossing the road and I cycle for more than I used to. It's quieter and less dusty. The birdcage crossing is the closure that has affected me the most and i'm really against removing it! it just makes the area feel better. I also use OBG road and that's much better. Arnold Circus is also far better now and has cut ASB.
- The traffic that does come through moves more slowly. The streets I walk to get to shops and other facilities are quieter, greener and more pleasant. I have a car which I use occasionally and do not mind the minor inconvenience of having fewer route as to choose from.
- The only problem is more drug user in the area in the Green and Area. Collect and Deliver their drugs and no-one to see what they do. It there is more offensive from people hanging around the streets. No car or people to see whats happening or what they are doing. If Barnet Grove is one way - this will become a rat run for traffic coming through from Hackney Road. The new changes do not make it any easier to use a car in this area. A one way system on Barnet Grove will not move
- The lovable streets scheme has. Made the area much quieter and safer for my grandchildren and many other children in our area
- I've been resident with my family here for 32 years. Liveable streets has greatly reduced the traffic dirt, noise and the toxic fumes which were entering our houses, as front doors open directly to the streets. our health and stress levels have greatly benefited and the area as a whole feels safer for children and safer to socialise in the open air.
- My street Baxendalg is quieter and safer. Before the changes cars used to drive at 40mph plus along it endangering residents. Now children play on the streets and the streets are more safer. The streets are less noisy.

My decision on the scheme was made more difficult because:

- 1) Poor quality of maps in this document
- 2) Maps don't clearly show my street
- 3) Maps and text don't show what is happening in the surroundings eg. Old Bethnal Green road
- 4) There's no subtlety in the proposal eg. traffic calming and cameras etc.

- It is so much more peaceful now there is no constant drug run down the street
- It's put residents and visitors before commercial traffic.
- It has made living on the Boundary estate much better- quieter and less of the associated and anti social behaviour of weekends with cars at night. It feels safer to walk and is more family friendly.
I would strongly object to Arnold Circus re-opening.
- It would make more sense if there were emergency gates instead of planters blocking roads, like we already had on some roads.
There is no point in extending the pavement if it still gets blocked by pub customers
- Traffic noise, pollution and night time economy criminal activity have decreased considerably since the road closures on Arnold circus. The noise levels have decreased to such an extent that we can now hear birdsong! The environment has greatly improved.
- The area feels more pedestrian friendly
- Better to walk around the area people are more friendly I find
- It means that in these narrow streets, we can at least have a decent nights sleep without rat running cars and motorbikes speedings noisily through our streets 24 hours a day. liveable streets at last gave us peace, quiet and clean air and well deserved sleep. With liveable streets, at least the youngsters and school kids have a chance of surviving beyond their 20's by being able to breathe clean air in their formative years.
Removal of liveable streets can only be done by spending millions on its removal, not to mention the millions it costs to implement.
- Although side streets are easier to cross due to less cars/vans speeding through constantly, we still get cars/vans/lorries sitting iddling their engines in wellington row and gosset street at all hours, which does nothing for pollution or the environment. so air quality has not improved
- One major benefit - especially around the Jesus Green/Quilter has been a marked reduction in drug dealing. Quilter Street cannot be used as a quick getaway for the dealers. Thus area feels MUCH safer for families, old people & children. Also, a reduction in gangs parking up on the street late at night (ASB) & shouting & fighting. This was very threatening. The area is MUCH quieter, air pollution is better as the gangs no longer leave their engines running all night & early hours of the morning.
- As a local resident with long term heath issues the Liveable Streets scheme has improved my ability to feel safe to get out into my local area. I am disappointed the council want to remove these improvements and waste our council tax money on repeated surveys. Residents have already taken part in consultations on these schemes and are in support of retaining them.
- Improving air quality and reducing through traffic literally saves lives. Why on earth would you want to do away with that? I understand that disabled residents have specific needs (I am disabled myself), and there are ways of meeting those needs without doing away with the benefits of the current scheme. The new proposal is utterly backwards.
- I have felt compelled to walk more
Less rat runs, especially around Barnet Grove, Old bethnal green rd. Harder for drug dealers in cars to make drop offs. As an autistic person, I feel safer crossing roads
There is less noise from motor vehicles
- My mental health improved significantly because i no longer hear loud car noises and the air is pleasant to breathe in.. it is also quiet which is very important to me . I feel safer and more confident. I started walking more and i do not worry about a car hitting me. It is so important for me to retain the existing scheme.
- More crowds of people. Due to closure of roads more traffic. Hassle during school hours

- The area is more for the people who live and work there.
- I cycle to Whitechapel sport centre and go through the area
- Please retain the Liveable Streets scheme. It is far far better than it was before - safe and less intimidating for me as a disabled person to both walk and to drive my car.
- My answers are as above, it is safer, easier to move about and air quality is better with existing closures. It is vital for children that the air quality is maintained and improved around schools. Also with the amount of building work that is occurring in Tower Hamlets, and the loss of even small green space and trees it is imperative that we reduced pollution by controlling traffic circulation/ways. I do appreciate that access does need to be given for key works/disability, as until recently I was carer for my mother who had these issues. But Plan 2 does not address pavement issues etc. Plan 2 puts commerce before health and really this needs to be more environmentally balanced given the massive increase of people that are coming into the borough due to new buildings works.
- Considerable improvement in street scape for the local area and 'community feel'. I would advocate strongly the completion of the liveable streets scheme to complete all proposals as per the original consultation. Particularly on Roman Road which is now heavily congested due to the closure of residential cut throughs, without implementing the planned measures for Roman Road and the wider area.
- Heightened level of safety for children going to school due to reduced traffic. Heighten number of locals walking to cars improving health of those who are fit to do so.

Comments from business respondents – all

Business responders who supported Option 1 provided the following comments.

- Clients arrive late more often.
- I haven't noticed a difference.
- When needed to do delivery if took longer and many times not been found by UBER the way, going into circles.
- remove these barriers.
- My customers do not come to Columbia Road because it is difficult for them to commute here from outside of London. They cannot navigate the closed street and are often stuck with the confusing road closure.
- At the time from start the scheme delay my journey to visit patient around the area because I have to see more time in traffic jam.
- I now spend 50% more time travelling to clients due to the increased traffic delays. Thereby reducing the number of clients I can meet each day, negatively affecting turnover.
- Heavy traffic on Hackney Road has increased journey times by car and bus from 6 minutes to 1 hour or more. Every afternoon, traffic is at a standstill increasing journey times, fuel consumption and pollution, so what improvement has been made- none!
- Two key suppliers will no longer make stock deliveries as congestion in the surrounding roads is making delivery times impossible and once on Columbia road, it is too difficult to exit. I would recommend that the short one way on Ravenscourt Road and Ezra Street is retained. It was something that should have been implemented long before LTN scheme.
- Quiet street leads to violence and organised crime. Our shop windows are being smashed on Columbia road and shops are broken into. More thieves targeting our shops.

- There should be an option for local people to use the inner roads.
- Customers are not comfortable with the many road closures along Columbia Rd and Arnold Circus Area
- My clients complain about getting to us for consults and finding places to park.

Business responders who supported Option 2 provided the following comments.

- Easier to run my business as cycling access is more fluid, customers are more likely to come.
- Since the installation of the planters and traffic-free area around Arnold Circus, the overall area has become much more peaceful and enjoyable. The anti-social drag racing of cars has stopped, which has a two-fold effect: no more extremely loud revving of engines, and a more pleasant experience when walking, cycling or taking time to sit and relax in the circus around the band stand.
- I work from home and my business is registered at my personal residence. I am not trading commercially in the area.
- My customers feel safer and less pollution and noise.
- Life is better without so many noisy, polluting cars and angry car drivers honking their horns all day long.
- We opened our business in December 2022
- Much larger footfall
- Much more foot traffic
- I work from home and the neighbourhood is more quieter and easier to use for meetings and public events.
- Many people around here are working from home more. No traffic and noise free make us walk around and shop around more helping bad business. As we run our business from our homes, the quiet neighbourhood without drunk people boosting music from their cars and drug selling on the streets, it is more better to live and work. Stop messing with the neighbourhood using ridiculous reasons. These changes have been great on all of us. Spend your time and resources for more beneficial developments.
- The quieter roads make it easier to safely support residents at the supported accommodation. It minimizes the risk from visitors or people outside the service and has been positive for addressing antisocial behaviour in the neighbourhood.
- I run my business from the area and value immensely my local environment and a feeling of community and connectedness in the area. Happy relaxed people who can walk in a leisurely fashion in an attractive desirable environment are more likely to spend money in the shops, surely!
- Extraordinarily upset that Tower Hamlets is wasting taxpayer money on this survey and on proposals changes that have no basis in scientific fact or in the economic well-being of its constituents. We need less traffic in our neighbourhood and more extensive green investment.
That you are proposing option one is an ignorant and reactionary steps.
- Since the closure of Gosset Street junction, we get a lot more people happy to walk and cycle in Columbia road. There is a much nicer atmosphere and less air pollution.
- Positive impact from new layout of Columbia Road Flower Market which feels much safer and better spaced out. We have had significant feedback from customers that they prefer the market in this layout and find the visitor experience much improved and safer. Footfall has increased at our part of the street. I would not want this to be impacted negatively by changes to Liveable Streets
- Positive impact from new layout of Columbia Road Flower Market which feels much safer and better spaced out. We have had significant feedback from customers that they prefer the market in this layout and find the visitor experience much improved

and safer. Footfall has increased at our part of the street. I would not want this to be impacted negatively by changes to Liveable Streets

- The loss of parking has meant loss of regular customers who need to use cars. However, we do not miss the traffic that used to cut through the estate. A single access to the estate on Calvert Avenue and leaving Arnold Circus open would be preferable - with parking bays - free, and for a limited time - 20 or 30 minutes would be ideal.
- The vast majority of LBTH residents don't own a car. Most journeys are being made by people using the borough to drive through.
- Please don't waste millions on reversing something that already cost the community millions and has made a significant improvement to the quality of life for this community. Learning to live without less cars is tough for some but will soon become a better healthier and safer life for all.
- The area is calmer and nicer.
- Most people access our premises by public transport, cycling or walking - the latter 2 improved by liveable streets.
- The mental health benefits and reduced air pollution has meant that I can continue to work in Tower Hamlets.
- The changes in parking restrictions have had a negative impact. We need more pay by meter spaces and daytime parking. I understand the need for night-time parking restrictions to control noise.
- Our leaseholders are less concerned about local crime and anti-social behaviour, such as peddling class A drugs in full public view.
- easier to move around.
- I tried to drive after 9 am until 3 pm. But if I expand my business it will cause a negative impact. It is impossible to set out or come back at peak time. However, I prefer option 2 to you because I feel air outside of my window is fresher now, very important for us. I have read in your option one that in CCTV camera installation around Arnold Circus. I believe this must be installed despite only available option there are huge impact on residence life. My window facing Calvert Avenue. I don't sleep four days a week there are constant car parties and nights are harsh for us. I recently had an anxiety disorder and I am taking medication for that. It is difficult to have a quality rest if most of the night I am experiencing disruptive sleep. CCTV cameras may help to improve it.
- I work from home on boundary Street and the area is more peaceful and safe for since the scheme was introduced.
- I am a singer and songwriter and I travel from home to give lessons to the children and adults in the neighbourhood. Some of the young students walk to my house for lessons and it has been a lot safer knowing the liveable streets scheme has been in place. So, it has impacted my business positively and the children's safety. The existing scheme also allows the community of residents to walk and cycle more safely. There are multiple schools in the area, so keeping the routes to schools safe is essential. The pollution in Bethnal Green was reduced by 20.13% within the liveable streets scheme. It is so important to keep our streets more green and safe. My partner who is the 3rd person living in my house is cycling every day to work and has noticed a huge difference in the safety of the road. In the previous scheme without the road closures there were repeated incidents of drug dealing cars speeding on the roads with no care on who was on them which was very dangerous.
- Huge increase in foot-traffic and people cycling. The area feels safer.
- The street closures have eliminated the all-night traffic jams on weekends. The 24/7 cut through of non-residents coming through the Boundary Estate to shorten their journeys via google maps and waze. The TFL buses on diversion using Arnold Circus to turn around. The street closures must remain in place!

- The traffic of people walking in the area has a positive outcome with the reduced cars. Red church street should become a traffic free area too.
- Much of our trade is passing customers-improved pedestrian access and safety has improved this.
- Customers find journey here improved workplace environment less antisocial place behaviour and on street drug dealing so feels safer.
- GUESTS ENJOY WALKING THROUGH THE NEIGHBOURHOOD AND ENJOY ARNOLD CIRCUS. PLEASE IMPROVE NOT REMOVE.
- The street is safer and nicer for walking for customers. More customers came to the shop on their bicycles. For customers with children and pets the street feels much safer and more appealing
- I don't own a business. I work in one. and it is clear that instead of watching for speeding cars, people have time to say hello. The knock-on effect in business is that residents are more readily open to meeting other residents in the area.
- Unless my business provides 'drive in service', otherwise no changes made to the customers flow. Wider pedestrian path around Columbia flower market is indeed a great change to the neighbourhood and feels a good elevation in quality of living.
- Change is never that much fun and my commute to work has become a few minutes longer but I have built that into my schedule and am happy to pay the price for a more civilised environment to live in.
- I am involved with the environment and so it resonates with my thinking, and the mission of the company, and also it's good to use as an example for clients. it's a better place in general to do my kind of business.

Scheme Evaluation	Criteria	Option 1:	Score (-5 to 5)
Facilitating the passage of vehicle traffic.	<p>The Traffic Management Act 2004 also places a duty on Local authorities to facilitate the passage of traffic. The council has a duty to coordinate street works while ensuring network resilience is maintained and that there is efficient and expeditious movement of traffic, as far as possible.</p>	<p>Pros</p> <ul style="list-style-type: none"> This option would remove all closures and reintroduce two-way traffic along Old Bethnal Green Road. This would network resilience and improve the network's ability to accommodate planned and unplanned events which require closures and diversions. Furthermore, this option could reduce afternoon peak congestion for buses on Hackney Road by allow some traffic an alternative eastbound route. The section between Warner Place and Cambridge Heath Road has experienced increased journey times since the implementation of the Liveable Streets Scheme. Would reintroduce a more direct through route and improve resilience by allowing for multiple routes through the area. Would Improve access through the area and remove the dependency on Hackney Road for access into or out of the area. Operational improvement to services including Utility companies and highways assets. <p>Cons</p> <ul style="list-style-type: none"> Gosset Street and Columbia Road junction would not return to pre-scheme access. Would be southbound only for general traffic. 	5
Facilitating the passage of vulnerable road users including pedestrians and cyclists	<p>The Traffic Management Act 2004 also places a duty on Local authorities to facilitate the passage of vulnerable road users. This includes the level of service from footways, crossings and cycle routes to meet the needs of demand in the area.</p> <p>Statutory Guidance for the TMA 2004 (network management to support active travel) encourages measures to reallocate road space to people walking and cycling.</p> <p>Measures highlighted in this guidance include:</p> <ul style="list-style-type: none"> installing cycle facilities enabling walking and cycling to school, for example, through the introduction of more 'school streets' reducing speed limits: introducing pedestrian and cycle zones: restricting access for motor vehicles at certain times <p>Local authorities have a statutory duty under section. 39 of the 1988 Road Traffic Act to "take steps both to reduce and prevent accidents.</p> <p>This is supported by Vision Zero which is an integral part of the Mayor's Transport Strategy and informs key objectives in the Tower Hamlets Local Implementation Plan.</p> <p>The Mayor's Transport Strategy sets out key principles for taking a healthy streets approach to public spaces. These key principles include:</p>	<p>Pros</p> <ul style="list-style-type: none"> Would reduce diverted traffic on to residential streets such as Swanfield Street <p>Cons</p> <ul style="list-style-type: none"> Would introduce new through traffic routes onto Columbia Road (via Ravenscroft Street and Ropley Street). These routes would result in increased traffic flows past both entrances of Columbia Road Primary School. There would be some mitigation though the installation of a new zebra crossing on Ravenscroft Street. Could potentially re-introduce pre-scheme traffic levels which were above 8000 daily trips. Furthermore, the two-way operation would require the removal of the cycle route on Old Bethnal Green Road and reduction of footway widths. Much of this space currently serves local schools and is in high demand particularly at school start and end times. This would be coupled with an increase in traffic in the area. 	-3

	<ul style="list-style-type: none"> • Ensuring pavements are smooth and level, and wide enough for people using wheelchairs or buggies, or walking with children or in groups • Providing protected cycle lanes where required – to make streets safe and appealing for cyclists • Making streets easier to cross, installing pedestrian crossings where people want to cross • Providing benches and regular opportunities for people to stop and rest • Planting street trees and other high-quality planting and greening • Using filtering to retain cycle access to local streets while removing access for cars 		
<p>Local Access.</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 178</p>	<p>This includes access for emergency service vehicles, deliveries and servicing for businesses.</p> <p>This also include the vehicles required for the council to fulfil various statutory functions including highways maintenance and waste collection.</p> <p>Under the highways act the council to maintain the highway which includes the maintenance and repair of assets including streets, footways and street lighting. We have worked closely with our highways maintenance team to assess the impact of the scheme since implementation and evaluate the potential impact of each of the options on highways maintenance operations.</p> <p>The council also has a statutory duty to collect waste and the council seeks to do this in the most effective and efficient way, We have worked closely with our waste collection team to assess the impact of the scheme since implementation and evaluate the potential impact of each of the options on waste collection operations.</p>	<p>Pros</p> <ul style="list-style-type: none"> • Would significantly improve local access for emergency vehicles where they would have access to all buildings in the area from any direction of approach. • Waste collections, passenger services and highways maintenance would be made much easier as it enables more efficient routing to cover the area. This option would also reduce the number of instances where waste collection vehicles having to reverse along streets with dead ends. It would also reduce the degree to which road closures would be required for addressing repairs and defects. • A key concern from residents has been how the closures have split the area in half and created a reliance on Hackney Road for access. Access to Columbia Road and the Jesus Green Estate is reliant on Hackney Road which often experiences high traffic congestion. Those who live south of Wellington Row must travel south and access Hackney Road through Warner Place for northbound vehicle journeys. There have been particular concerns from residents who rely on car access such as those who need to attend regular medical appointments and carer access. • Large parts of the Old Bethnal Green Road area suffer from poor vehicle access due to a single access (Mansford Street) and single way out (Temple Street). This Option would significantly improve access, particularly for residents who rely on vehicle access and local businesses. <p>Cons</p> <p>None</p>	5
Air Quality	<p>The council has presented data on the likely air quality impacts across of the Liveable Streets across the area. This evaluation will consider the likely impact of the different options on air quality by considering the estimated traffic levels and population densities across the area.</p>	<p>Pros</p> <ul style="list-style-type: none"> • Air quality would potentially improve in areas that have seen increases in traffic and congestion since the Liveable Streets scheme was implemented. These include Swanfield Street and Virginia Road. <p>Cons</p> <ul style="list-style-type: none"> • The increase in traffic would increase emissions in the central parts of the scheme area. Analysis of the latest census data shows these areas where population density is highest. These are also the areas where all of the schools are located. 	-3

Financial cost	<p>This includes the cost of works to develop and implement the option. These costs include detailed design, traffic management and physical works.</p>	<ul style="list-style-type: none"> This option would have the highest financial cost although this would be minimised through the re-use and recycling of materials. Much of the new public realm that was installed as part of the scheme would require removals. This would include and pocket park, cycle lane and most of the newly widened footway on Old Bethnal Green Road. It would also require the removal of the pocket park on the junction of Columbia Road and Gosset Street. This option also includes the cost of wider public realm improvements as set out in the public consultation. <p>Estimated cost: £2.5m</p>	-3
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Scheme Evaluation	Criteria	Option 2: Full retention of current scheme	Score (-5 to 5)
Page 179 Facilitating the passage of vehicle traffic.	<p>The Traffic Management Act 2004 also places a duty on Local authorities to facilitate the passage of traffic. The council has a duty to coordinate street works while ensuring network resilience is maintained and that there is efficient and expeditious movement of traffic, as far as possible.</p>	<p>Pros</p> <p>None</p> <p>Cons</p> <p>Old Bethnal Green Road:</p> <ul style="list-style-type: none"> Network resilience issues would remain. Much of the Old Bethnal Green Road area would rely on a single access (Mansford Street) and single way out (Temple Street). Vehicles entering or exiting the area relying on the most congested part of Hackney Road. Afternoon peak congestion for buses on Hackney Road would remain. The section between Warner Place and Cambridge Heath Road has experienced increased journey times since the implementation of the Liveable Streets Scheme. Resilience issues relating to the lack of alternative routes to and through the area would remain. Resilience issues relating to the lack of alternative routes to and through the area would remain. Operational impact to services including utilities & highways assets 	-4
Facilitating the passage of vulnerable road users including pedestrians and cyclists	<p>The Traffic Management Act 2004 also places a duty on Local authorities to facilitate the passage of vulnerable road users. This includes the level of service from footways, crossings and cycle routes to meet the needs of demand in the area.</p> <p>Statutory Guidance for the TMA 2004 (network management to support active travel) encourages measures to reallocate road space to people walking and cycling.</p> <p>Measures highlighted in this guidance include:</p> <ul style="list-style-type: none"> installing cycle facilities enabling walking and cycling to school, for example, through the introduction of more 'school streets'. reducing speed limits: introducing pedestrian and cycle zones: restricting access for motor vehicles at certain times 	<p>Pros</p> <ul style="list-style-type: none"> This option would retain the segregated cycle route and a significant amount of footway space and planting delivered through the Liveable Streets scheme. Much of this space currently serves local schools and is in high demand particularly at school start and end times. Arnold Circus is a dense residential area and would remain traffic free. There has also been a reduction in night time economy related ASB which has been attributed to the closures by the police, TfL and some residents. This option would retain the pocket park installed on the junction of Columbia Road and Gosset Street <p>Cons</p> <ul style="list-style-type: none"> Traffic would continue to be diverted through Swanfield Street and Virginia Road where footways are narrower. This traffic also diverted to the western section of Columbia Road where cycle counts show is well used by cyclists. These cycle flows are much higher than on Arnold Circus and Calvert Avenue 	4

	<p>Local authorities have a statutory duty under section. 39 of the 1988 Road Traffic Act to "take steps both to reduce and prevent accidents.</p> <p>This is supported by Vision Zero which is an integral part of the Mayor's Transport Strategy and informs key objectives in the Tower Hamlets Local Implementation Plan.</p> <p>The Mayor's Transport Strategy sets out key principles for taking a healthy streets approach to public spaces. These key principles include:</p> <ul style="list-style-type: none"> • Ensuring pavements are smooth and level, and wide enough for people using wheelchairs or buggies, or walking with children or in groups • Providing protected cycle lanes where required – to make streets safe and appealing for cyclists • Making streets easier to cross, installing pedestrian crossings where people want to cross • Providing benches and regular opportunities for people to stop and rest • Planting street trees and other high-quality planting and greening • Using filtering to retain cycle access to local streets while removing access for cars 		
<p>Local Access.</p>	<p>This includes access for emergency service vehicles, deliveries and servicing for businesses.</p> <p>This also include the vehicles required for the council to fulfil various statutory functions including highways maintenance and waste collection.</p> <p>Under the highways act the council to maintain the highway which includes the maintenance and repair of assets including streets, footways and street lighting. We have worked closely with our highways maintenance team to assess the impact of the scheme since implementation and evaluate the potential impact of each of the options on highways maintenance operations.</p> <p>The council also has a statutory duty to collect waste and the council seeks to do this in the most effective and efficient way, We have worked closely with our waste collection team to assess the impact of the scheme since implementation and evaluate the potential impact of each of the options on waste collection operations.</p>	<p>Pros</p> <p>None</p> <p>Cons</p> <ul style="list-style-type: none"> • Issues relating to local access for emergency vehicles would remain. There is hindered access to all buildings in the area from any direction of approach around Arnold Circus. • Waste collections would remain unable to efficient routing to cover the area. This option would also reduce the number of instances where waste collection vehicles having to reverse along streets with dead ends. • A key concern from residents around Columbia Road and Jesus Green has been how the closures have split the area in half and created a reliance on Hackney Road for access. Access to Columbia Road and the Jesus Green Estate is reliant on Hackney Road which often experiences high traffic congestion. Those who live south of Wellington Row must travel south and access Hackney Road through Warner Place for northbound vehicle journeys. There have been particular concerns from residents who rely on car access such as those who need to attend regular medical appointments and carer access. These issues would remain if the scheme with retained in its current form. • Large parts of the Old Bethnal Green Road area suffer from poor vehicle access due to a single access (Mansford Street) and single way out (Temple Street). This Option would significantly improve access, particularly for residents who rely on vehicle access and local businesses. 	<p>-5</p>

Air Quality	The council has presented data on the likely air quality impacts across of the Liveable Streets across the area. This evaluation will consider the likely impact of the different options on air quality by considering the estimated traffic levels and population densities across the area.	<p>Pros</p> <ul style="list-style-type: none"> Since the Liveable Streets scheme was implemented, air quality has improved for much of the scheme area particularly where population density is highest. Analysis of the latest census data shows these are also the area where schools are located. <p>Cons</p> <ul style="list-style-type: none"> The air quality implications of increased traffic and congestion on Swanfield Street and Virginia Road would remain. 	3
Financial cost	<p>This includes the cost of works to develop and implement the option. These costs include detailed design, traffic management and physical works.</p> <p>Costs also included the cost on maintenance and refuse collection. For maintenance this includes traffic management costs and for waste collection this includes the additional resources required for routing through the area.</p>	<ul style="list-style-type: none"> This option would have the lowest financial cost. The new public realm that was installed as part of the scheme would be retained This option would result in the highest cost to the council for undertaking maintenance, passenger services and refuse collection operations. <p>Estimated cost: £0m</p>	

Page 181	Scheme Evaluation	Criteria	<p>Option 3: This is an amended version of option which seeks to resolve concerns raised by key internal and external stakeholders and the public consultation.</p> <p>Old Bethnal Green Road Removal of closure on Punderson's Gardens. Removal of closure on Teesdale Street. Removal of closure on Old Bethnal Green Road. Retention of closure on Clarkson Street. Removal of closure on Canrobert Street. Removal of closures on Pollard Street and Pollard Row. Making Old Bethnal Green Road two way between Pollard Row and Clarkson Street. New camera filters on Old Bethnal Green Road junction with Temple Street to operate during peak times (with resident exemption). Widen footway on Old Bethnal Green Road between Mansford Street and Pollard Row. New school street on Pollard Street.</p> <p>Columbia Road Area The removal of the closure on the junction of Columbia Road and Gosset Street and Gosset Street and allowing southbound traffic only. The removal of closures on Quilter Street and the junction of Wellington Row and Barnet Grove. Wellington Row would be one way westbound from the junction of Delta Street to the junction with Gosset Street. Wellington Row would be one way eastbound from the junction of Delta Street to the junction with Durant Street. Barnet Grove kept two with prohibitions to northbound traffic to allow for emergency service vehicles. Keep one-way section on Ravenscroft Street (between Ezra Street and Columbia Road) Making one-way section on Columbia Road (between Chambord Street and Ravenscroft Steet) two-way. New camera filter on Hackney Road junction with Ropley Street to operating Monday to Saturday. Only restricts turning from Hackney Road into Ropley Street (with resident exemption)</p> <p>Arnold Circus Area Removal of closures at each arm of Arnold Circus. Removal of Closure on the junction between Old Nichol Street. Four new camera filters on Old Nichol Street and Arnold Circus junction with Calvert Avenue, Navarre Street and Hocker Street restricting nighttime through travel and associated ASB (with resident exemption)</p>	Score (-5 to 5)
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<p>Facilitating the passage of vehicle traffic.</p>	<p>The Traffic Management Act 2004 also places a duty on Local authorities to facilitate the passage of traffic. The council has a duty to coordinate street works while ensuring network resilience is maintained and that there is efficient and expeditious movement of traffic, as far as possible.</p>	<p>Pros</p> <ul style="list-style-type: none"> This option would remove all closures and reintroduces one-way traffic along Old Bethnal Green Road. This would improve network resilience and the network's ability to accommodate planned and unplanned events which require closures and diversions. But to a lesser extent than Option 1. Furthermore, this option would contribute to reducing afternoon peak congestion for buses on Hackney Road by allow some traffic an alternative eastbound route. The section between Warner Place and Cambridge Heath Road has experience increased congestion and bus journey times since the implementation of the Liveable Streets Scheme Would reintroduce a more direct through route and improve resilience by allowing for multiple routes through the area. Would Improve access through the area and remove the dependency on Hackney Road for access into or out of the area. Would seek to address ASB related to the night-time economy near Arnold Circus. Night-time camera filters would address ASB concerns raised by the police, TfL and some local residents. <p>Cons</p> <ul style="list-style-type: none"> But retaining the one-way operation of Old Bethnal Green Road, this option would not restore the full vehicle access and network resilience from before the Liveable Streets Scheme 	<p>4</p>
<p>Facilitating the passage of vulnerable road users including pedestrians and cyclists</p>	<p>The Traffic Management Act 2004 also places a duty on Local authorities to facilitate the passage of vulnerable road users. This includes the level of service from footways, crossings and cycle routes to meet the needs of demand in the area.</p> <p>Statutory Guidance for the TMA 2004 (network management to support active travel) encourages measures to reallocate road space to people walking and cycling.</p> <p>Measures highlighted in this guidance include:</p> <ul style="list-style-type: none"> installing cycle facilities enabling walking and cycling to school, for example, through the introduction of more 'school streets'. reducing speed limits: introducing pedestrian and cycle zones: restricting access for motor vehicles at certain times <p>Local authorities have a statutory duty under section. 39 of the 1988 Road Traffic Act to "take steps both to reduce and prevent accidents.</p> <p>This is supported by Vision Zero which is an integral part of the Mayor's Transport Strategy and informs key objectives in the Tower Hamlets Local Implementation Plan.</p> <p>The Mayor's Transport Strategy sets out key principles for taking a healthy streets approach to public spaces. These key principles include:</p> <ul style="list-style-type: none"> Ensuring pavements are smooth and level, and wide enough for people using wheelchairs or buggies, or walking with children or in groups 	<p>Pros</p> <ul style="list-style-type: none"> As well as retaining the cycle route and much of the new public realm on Old Bethnal green Road, This option would also include wider public realm improvements to the area including new crossings and raised junctions to improve accessibility. The retention of one way operation of Old Bethnal green Road operation would enable an increase in width of the southern footway between Mansford Street and Pollard Row (adjacent to Elizabeth Selby School). This option also includes a new School Street on Pollard Street which would improve safety around the existing school entrance. Three new zebra crossings in the Columbia Road area would improve crossing options. While the retention of one-way operation on Ravenscroft Street and a new ANPR filter on Ropley Street would address new through routes. Traffic is diverted away from Swanfield Street and Virginia Road where footways are narrower. Traffic is also diverted away from the western section of Columbia Road where cycle counts show is a well used by cyclists. These cycle flows are much higher than on Calvert Avenue <p>Cons</p> <ul style="list-style-type: none"> Would re-introduce traffic through Arnold Circus which is currently traffic free. Would create two new routes for traffic through Jesus Green and Gosset Street. Would introduce some traffic through Old Bethnal green Road 	<p>-2</p>

	<ul style="list-style-type: none"> • Providing protected cycle lanes where required – to make streets safe and appealing for cyclists • Making streets easier to cross, installing pedestrian crossings where people want to cross • Providing benches and regular opportunities for people to stop and rest • Planting street trees and other high-quality planting and greening • Using filtering to retain cycle access to local streets while removing access for cars 		
<p>Local Access.</p>	<p>This includes access for emergency service vehicles, deliveries and servicing for businesses.</p> <p>This also include the vehicles required for the council to fulfil various statutory functions including highways maintenance and waste collection.</p> <p>Under the highways act the council to maintain the highway which includes the maintenance and repair of assets including streets, footways and street lighting. We have worked closely with our highways maintenance team to assess the impact of the scheme since implementation and evaluate the potential impact of each of the options on highways maintenance operations.</p> <p>The council also has a statutory duty to collect waste and the council seeks to do this in the most effective and efficient way, We have worked closely with our waste collection team to assess the impact of the scheme since implementation and evaluate the potential impact of each of the options on waste collection operations.</p>	<p>Pros</p> <ul style="list-style-type: none"> • Would significantly improve local access for emergency vehicles where they would have access to all buildings in the area from any direction of approach. Waste collections and highways maintenance would also be made much easier as it enables more efficient routing to cover the area. This option would also reduce the number of instances where waste collection vehicles having to reverse along streets with dead ends. • A key concern from residents has been how the closures have split the area in half and created a reliance on Hackney Road for access. Access to Columbia Road and the Jesus Green Estate is reliant on Hackney Road which often experiences high traffic congestion. Those who live south of Wellington Row must travel south and access Hackney Road through Warner Place for northbound vehicle journeys. There have been particular concerns from residents who rely on car access such as those who need to attend regular medical appointments and carer access. • Large parts of the Old Bethnal Green Road area suffer from poor vehicle access due to a single access (Mansford Street) and single way out (Temple Street). This Option would significantly improve access, particularly for residents who rely on vehicle access and local businesses. Would significantly improve local access for emergency vehicles where they would have access to all buildings in the area from any direction of approach. Waste collections and highways maintenance would also be made much easier as it enables more efficient routing to cover the area. This option would also reduce the number of instances where waste collection vehicles having to reverse along streets with dead ends. <p>Cons</p> <ul style="list-style-type: none"> • Retention of one-way operation would not restore pre scheme Emergency vehicle access to Old Bethnal Green Road. • Retention of one-way operation would not restore pre scheme access for highways maintenance, council passenger services and waste collection operations. 	<p>3</p>
<p>Air Quality</p>	<p>The council has presented data on the likely air quality impacts across of the Liveable Streets across the area. This evaluation will consider the likely impact of the different options on air quality by considering the estimated traffic levels and population densities across the area.</p>	<p>Pros</p> <ul style="list-style-type: none"> • Air quality would potentially improve in areas that have seen increases in traffic and congestion since the Liveable Streets scheme was implemented. These include Swanfield Street and Virginia Road. • The majority of the air quality benefits of the Liveable Streets scheme are retained due to traffic restrictions to through traffic such as the retention of One way operation of Old Bethnal green Road and new camera filters. <p>Cons</p> <ul style="list-style-type: none"> • The limited increase in traffic would increase emissions in the central parts of the scheme area where population density is highest. Analysis of the latest census data shows these are also the area where schools are located. 	<p>-1</p>

Financial cost	<p>This includes the cost of works to develop and implement the option. These costs include detailed design, traffic management and physical works.</p>	<ul style="list-style-type: none"> This option would have a significantly lower financial cost than option 1. Much of the new public realm that was installed as part of the scheme would require removals. This would include a pocket park, cycle lane and most of the newly widened footway on Old Bethnal Green Road. It would also require the removal of the pocket park on the junction of Columbia Road and Gosset Street. This option also includes the cost of wider public realm improvements as set out in the public consultation. <p>Estimated cost: £1.2m</p>	-2
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Total score Evaluation

Scheme Evaluation	Option 1	Option 2	Option 3
Facilitating the passage of vehicle traffic.	5	-5	2
Facilitating the passage of vulnerable road users including pedestrians and cyclists	-3	4	-2
Local Access.	5	-5	4
Air Quality	-3	3	-1
Financial cost	-3	3	-2
Total Score	1	0	1

A Better Bethnal Green

Public consultation
on transport
changes in the
Old Bethnal Green
Road Area

Page 185



Mayor's Foreword

The transport network is a vital part of everyday life. It enables people to make their regular journeys to and from home for work, study, leisure, socialising or shopping and provides essential means of access to healthcare and welfare services. Businesses rely on transport to bring employees and customers to their premises and convey their goods and services. It enables family to travel to vulnerable relatives and provide a network of community and support. An efficient and sustainable transport system is vital for addressing issues relating to public health, air quality, accessibility and growth.

When the Liveable Streets scheme was first implemented, concerns were raised which included among other things, access for people reliant on vehicle use and emergency service vehicles. There were also concerns regarding the impact on local bus services, access to families and support networks, and of displaced traffic on areas surrounding the scheme's locations.

The scheme has been in place for nearly 18 months, and this has allowed for an analysis against its key objectives and consideration of the impacts on all residents and stakeholders. For parts of the scheme, it has reduced some traffic levels and improved the public realm in a way that makes it safer for walking and cycling. The public realm schemes on Old Bethnal Green Road and Columbia Road have resulted in reductions in traffic levels in the areas around them.

However, we have received strong feedback from residents and stakeholders reporting adverse impacts from the

scheme. Data shows that there has been an adverse impact on local bus services and displaced traffic on local and boundary roads. Concerns regarding access to vital familial and social networks, as well as an economic impact on small businesses – ranging from shops to taxi drivers, market stallholders to delivery men and women – have also repeatedly been raised with the council. Working with stakeholders such as the emergency services has shown there have also been adverse impacts on access. In the summer of 2022, the council undertook a first stage consultation to gain a better understanding of public opinion on the Liveable Streets scheme. We have received strong feedback from residents and stakeholders which has allowed us to develop our proposals further.

I am pleased to present this document which is the next stage in our consultation on proposals to address matters that have been raised regarding the Liveable Streets scheme and make transport changes across the Bethnal Green area. This second stage consultation provides more detail on our proposals and the data which supports them.

Our key objective is to create healthier streets, with improvements to accessibility and road safety while restoring access for key services and residents reliant on their cars. All residents and other stakeholders are encouraged to have their say and respond to this consultation and help us shape our proposals.



Mayor Lutfur Rahman



This consultation

We are consulting on whether to implement a series of changes that have been developed following engagement with key stakeholders and data analysis (see part two of this document).

The proposed changes are focused on the following:

- Improving access for all
- Improving conditions for active travel across the whole area
- Improving the conditions for public transport use through improved performance and access
- Reduced traffic on unsuitable roads
- Ensuring local businesses and keyworkers are not adversely impacted
- Improving access for emergency Vehicles
- Contributing to improved air quality through encouraging active travel and public transport use

Structure of this document

Part 1 of this consultation sets out the course of action the council is considering.

Part 2 sets out the data that has been considered in developing the options in the consultation. It presents a combination of data and feedback from the first stage of consultation held in the summer.

Part 3 provides guidance on responding to this consultation.

Introduction

In 2019, The London Borough of Tower Hamlets launched the Liveable Streets Programme. The key objective of the scheme was to improve the look and feel of the area by upgrading the public realm and enhancing conditions for walking and cycling.

The Liveable Streets scheme in Bethnal Green involved a series of road closures and directional changes to traffic. It also included a series of public realm enhancements to Columbia Road and Arnold Circus and a new pocket park on Old Bethnal Green Road.

The map opposite shows the full set of interventions which were approved under the scheme which was not completed. The following elements were yet to be implemented.

- Warner Place and Squirries Street to made one way northbound
- Road closure on the junction of Gosset Street and Warner Place
- Road closure on the junction of Virginia Road

The Liveable Streets scheme was implemented in phases and these final elements were delayed due to a review of the scheme which was announced in September 2021. Further engagement was undertaken with residents and other stakeholders and as well as additional traffic counts. The council considered completing the scheme but has decided not to proceed with this due to the likely impact of displaced traffic. This is covered in more detail in the next page of this document.



Original Bethnal Green Liveable Streets scheme map

The Options

The council has undertaken an evaluation of the Liveable Streets scheme by gathering and analysing data from various sources and engaging with key stakeholders.

Below we set out options which have been developed for respondents to consider. Option 1 sets out a series of changes which seek to address issues that have been identified. Option 2 is for retaining the current scheme and its benefits. We also set out below other options that were considered and the reasons they were not taken forward.

Option 1: Remove the Liveable Streets closures and implement a series of areawide improvements to encourage active travel

This option would seek to strike a balance between traffic restrictions and essential access for disabled residents, the emergency services and various council services such as maintenance and street works coordination. It would also seek to address traffic congestion and bus service delays on Hackney Road (see page 13).

Option 2: Retain the current scheme

This option is for no changes to be made to the area. For some parts of the area, the Liveable Streets scheme has largely been successful in reducing traffic levels and improving the public realm in a way that makes it safer for walking and cycling. Traffic levels shown on page 15 of this document show the streets in the area which have benefitted from reduced traffic. These include streets that are close to

some of the schools in the area. The data also shows that traffic levels have fallen for the area as a whole.

The pocket park on Old Bethnal Green Road and new public realm on Columbia Road have resulted in significant

improvements to the look and feel in those areas with new planting, trees and seating.

Other options considered

The council has considered other options which will not be taken forward. These are completing the originally approved scheme with more closures or replacing physical closures with cameras. These are discussed below.

Completing the Liveable Streets scheme by installing the two remaining closures

Some of the issues with displaced traffic on local roads are due to an incomplete approved scheme. The original approved scheme included further closures on Virginia Road and Gosset Street.

In April 2022, daily traffic flows were 5,142 on Swanfield Street and 6,495 on Warner Place. Some of these are local resident trips, but the majority would be through traffic. Closing these two roads with physical closures would effectively divert most of these 11,500 vehicle trips onto Hackney Road and Bethnal Green Road, which would exacerbate the issues we have seen on Hackney Road, particularly the impact on bus services.

This approach would also worsen the access issues that have been shown to be experienced by the emergency services and disabled residents.

Replacing physical closures with cameras

This would address the access issues that come with the above option but the issues of displaced traffic would remain.

The benefits of each option

Option 1: Remove the Liveable Streets closures and implement a series of areawide improvements to the public realm to encourage active travel	Option 2: Retain the current scheme
Benefits Improved access for those reliant on car travel including key workers and those who use car travel as their main source of income Improved access for emergency vehicles, deliveries and council services Improved road network resilience Improved access for businesses Improved bus service performance through less congestion on Hackney Road and Bethnal Green Road Lower traffic levels on Swanfield Street, Virginia Road and Ropley Street Increased planting, trees and seating in the area as result of the new pocket park and other public realm improvements across the area	Benefits Lower traffic levels on Old Bethnal Green Road and Gosset Street Better for cycling: There is existing segregated westbound cycling provision on Old Bethnal Green Road between Clarkson Street and Mansford Street. This would be removed if option 1 was to be implemented There are four schools along Old Bethnal Green Road and Gosset Street which currently benefit from reduced traffic levels from the closures Air quality has improved within the scheme area at a higher rate than in other comparable areas in the borough

Option 1: Changes in the Old Bethnal Green area

Option 1

Option 1 has been developed following consideration of the available data and engagement with stakeholders.

The key principles behind option 1 are:

- Improved access
- Addressing the impacts of displaced traffic
- Improving conditions for active travel for the whole area

Removal of closures

For Teesdale Street, the closure would be replaced with a continuous crossing which prioritises pedestrians over motor vehicles. The junction would also be near a new zebra crossing which would improve crossing options for pedestrians.

The Old Bethnal Green Road closure would be replaced with a new zebra crossing and the nearby junction with Temple Street would also benefit from a new continuous crossing.

The Punderson's Gardens, Canrobert Street and Clarkson Street closures would also be removed.

New loading bay and pedestrian space outside shops

Changes to the space outside the shops on Old Bethnal Green Road include a new loading bay and wider pavements for pedestrians.

Two way operation of Old Bethnal Green Road

The proposals include changing Old Bethnal Green Road to two-way traffic between Pollard Row and Clarkson Street.

Pollard Row and Pollard Street

The proposals include the removal of the Pollard Street and Pollard Row closures and public realm enhancements to improve pedestrian space and increase planting and trees.

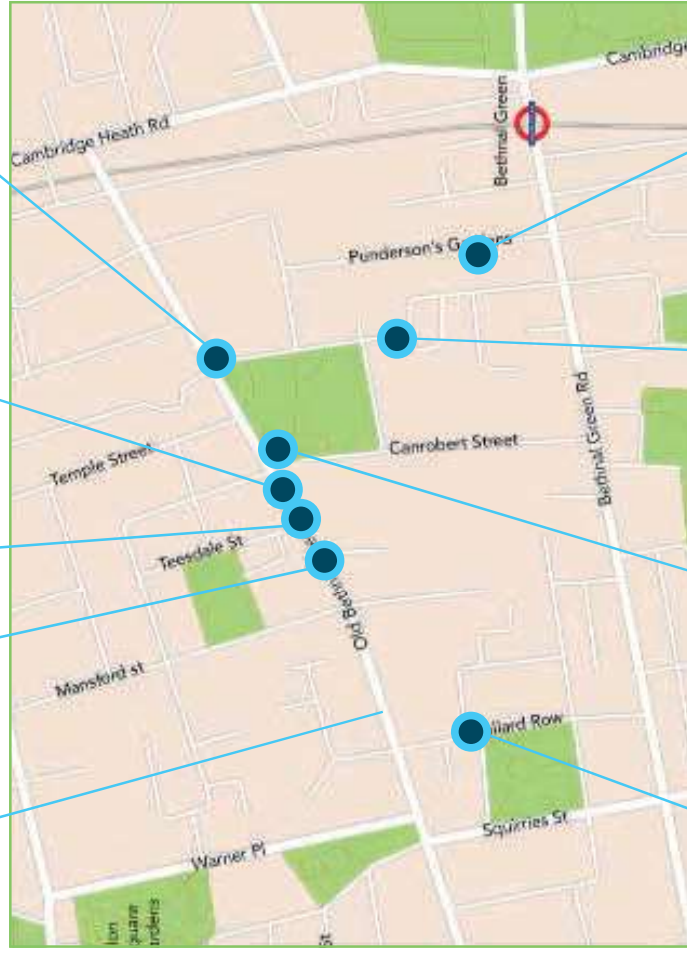
Two way operation of Old Bethnal Green Road from Pollard Row to Clarkson Street

New zebra crossing

Removal of closure on Teesdale Street

New parking bay and footway space outside shops

Removal of pocket park on Old Bethnal Green Road and replacement with new zebra crossing and planting



Footway improvements and new planting on Pollard Street and Pollard Road

Removal of closure on Canrobert Street

Removal of closure on Clarkson Street

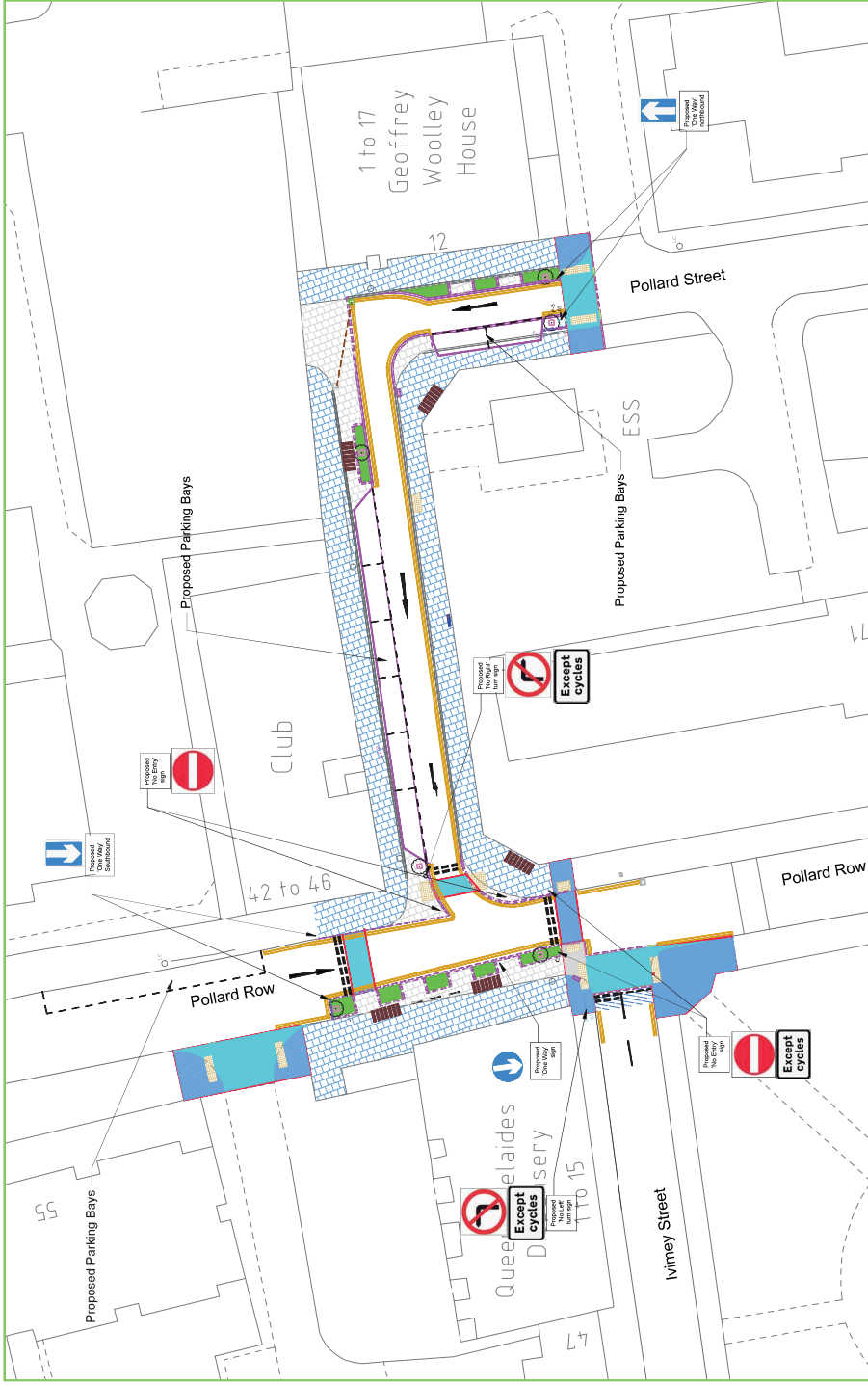
Removal of closure on Punderson's Gardens

Option 1: New public realm improvements

Pollard Row and Pollard Street

Option 1 includes the removal of the Pollard Street and Pollard Row closures and public realm enhancements to improve pedestrian space. The designs include:

- New planting and seating on Pollard Street
- More footway space on Pollard Street outside the school entrance
- New one-way southbound operation on Pollard Row



Option 1: Improving conditions for public transport use and active travel for the whole area

Improving conditions for public transport

In 2018/19, the two bus routes serving Hackney Road provided over twelve million passenger journeys. Through option 1, we are seeking to contribute to meeting one of the council's key strategic transport objectives to encourage public transport use. We will do this by improving bus service performance and improving access to public transport services.

Improving bus performance

One of the most important factors influencing bus use is service reliability. Traffic congestion can significantly impact on reliability and therefore adversely impact on efforts to encourage increased bus use. By reversing the diversion of traffic onto Hackney Road from the Liveable Streets road closures we will seek to improve bus journey times particularly on the section between Warner Place and Cambridge Heath Road.

Improving access to stations and stops

Half of all walking in London takes place as part of a longer public transport journey¹. Buses are the most accessible form of public transport, and they provide the widest and most comprehensive network of travel options for distances that are too long to walk. High quality and accessible walking routes to stations and stops are therefore integral to encouraging public transport use.

In this document, we set out a series of walking improvements which improve access to public transport across the area.

Improving conditions for active travel

In terms of encouraging active travel, Option 1 seeks to improve conditions across the whole Bethnal Green area.

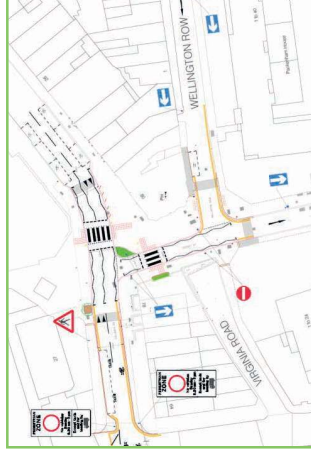
As well as addressing the issue of diverted traffic onto some smaller residential streets, these proposals also seek to make public realm improvements across the area rather than concentrating them in certain areas. All new designs would be in-line with the Healthy Streets approach principles developed by Transport for London (TfL). These are set out in the Healthy Streets diagram shown below.



Improved crossing options

Option 1 includes plans for five new crossings in the scheme area (on Old Bethnal Green Road, Columbia Road and Ravenscroft Street).

Our streets need to be easy to cross for everyone. This is important because people prefer to be able to get where they want to go directly and quickly, so if this is made more difficult, they will get frustrated and give up or choose another way to travel.

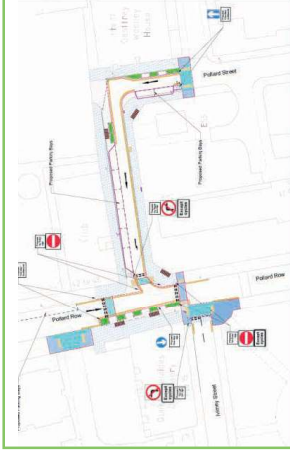


New crossings on Columbia Road and Gosset Street

More planting and trees

Trees and planting can provide multiple benefits to local communities. This includes reducing the impact of climate change and improving the look and feel of the area.

Designs for all changes in the area would seek to result in more trees and planting across the area. Planting and new trees are included in designs for the new public realm scheme on Pollard Row and Pollard Street.



New seating and planting on Pollard Street

Places to stop and rest - more public seating

Seating is essential for creating environments that are inclusive for everyone as well as being important for making streets welcoming places to dwell. Option 1 includes public realm improvements on Old Bethnal Green Road, which would seek to retain seating in the area and the new scheme on Pollard Street would increase in public seating in the area.

Option 1 is therefore focused in improving access to and around shops in the area. This includes public transport and car access, but also pedestrian access through improved walking links to the shops from the wider area.

1: Mayors Walking Action Plan - <https://content.tfl.gov.uk/mts-walking-action-plan.pdf>

Option 1: Creating an accessible network of streets

Accessible routes across the area
 A walking network that is accessible can be very effective in encouraging physical activity back into our everyday lives. The lack of physical activity is one of the biggest threats to our health, increasing the risk of developing a range of chronic diseases including diabetes, dementia, depression and the two biggest killers in London – heart disease and cancer.

For informal crossing, there are many examples across the area where it is difficult to cross, particularly for wheelchair users. Level or flush access between the pavement and road is essential for most wheelchair users. We would improve crossing points either through dropped kerbs or raised crossings to avoid the need for wheelchair users to make lengthy detours to cross the road.



Lack of dropped kerb on Columbia Road

Furthermore, walking is an integral component of using public transport services. Improving walking routes and making them accessible is key to encouraging the increased use of public transport services for all residents.

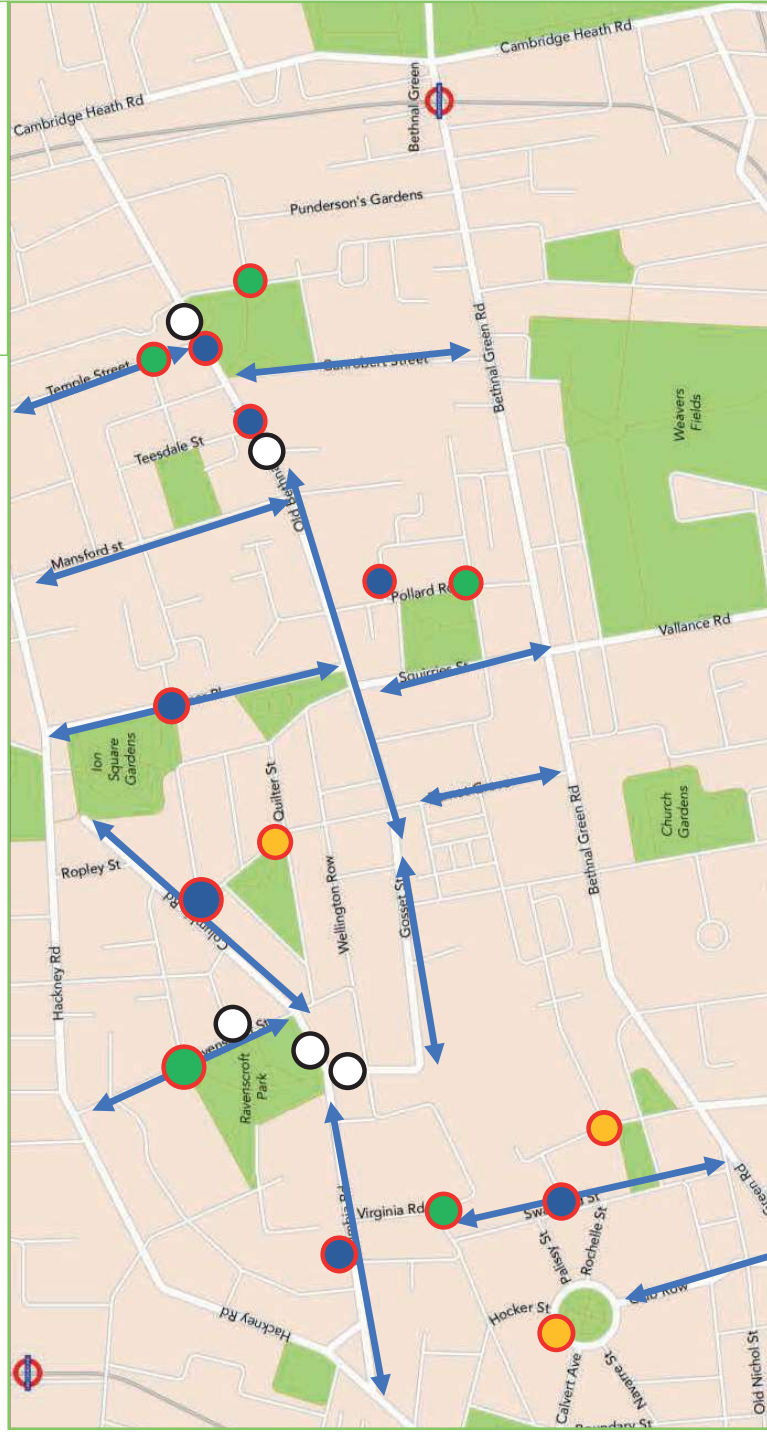
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Accessible footways
 Option 1 includes plans to create a network of accessible walking routes across Bethnal Green. Creating this network would make it easier for residents to access important services including doctors' surgeries, shops and public transport.

The map on this page identifies a first phase of pedestrian improvements we are considering. These improvements include formal crossings such as zebra crossings, which will be located on Columbia Road, Gosset Street and Old Bethnal Green Road;

Route identified for pedestrian improvements

- Route identified for pedestrian improvements (Blue double-headed arrow)
- Raised table (Red circle)
- New continuous crossing (Blue circle)
- New dropped kerbs (Yellow circle)
- New zebra crossing (White circle)



Option 2: Retaining the scheme

For some parts of the area, the Liveable Streets scheme has largely been successful in reducing traffic levels and improving the public realm in a way that makes it safer for walking and cycling.

Reduced traffic levels

Traffic data shown on page 15 of this document shows the streets in the area which have benefitted from reduced traffic. These include streets that are close to some of the schools in the area.

The data also shows that traffic levels have fallen for Bethnal Green as a whole with a reduction of over 9700 vehicle trips.

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	Change in traffic from 2019-2022
Reynolds Road	-455
Admiral Street	346
Ropley Street	284
Temple Street	-1227
B118 Old Bethnal Green Road	-6437
B108 Warner Place	187
B108 Squirries Street	-1862
Columbia Road	-522
B118 Columbia Road	-4807
Virginia Road	1544
Swanfield Street (North)	3253
	-9715

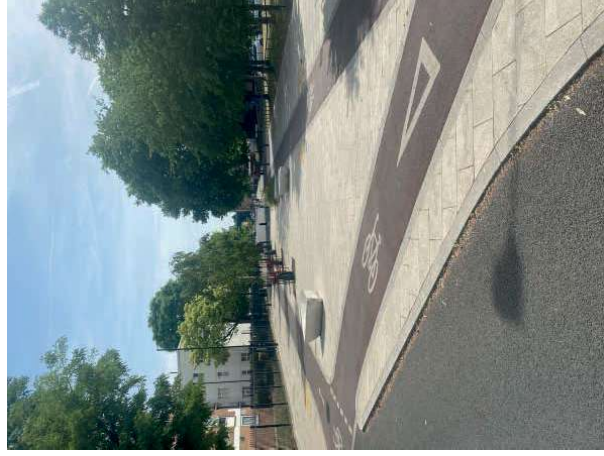
Traffic changes from 2019-2022

Public Realm

The Liveable Street Scheme has resulted in significant improvements to the public realm in various locations in the area. This has often complimented the reductions in traffic and introduced increase planting, trees and seating and facilities for walking and cycling.

Old Bethnal green Pocket Park

The pocket park on Old Bethnal Green Road has resulted in significant change to the area with reduced traffic, more planting and more seating. The makes it easier to cross and cycle in and through the area.



Old Bethnal Green Road Pocket Park

Old Bethnal Green Road cycling route

The scheme includes the provision of segregated cycling from Clarkson Street to Mansford Street. This provides segregated cycling for approximately 200 metres providing safe cycling.



Cycle lane on Old Bethnal Green Road

Part 2: Data considered in developing the options

This part of the consultation sets out the data which will allow residents and stakeholders to consider the options. It includes:

- Data gathered directly by the council
- Data provided by stakeholders

The sections are as follows:

Part 2a: Impact on disabled residents

This covers the impact on disabled residents.

Part 2b: Access for emergency service vehicles, streetworks and council services

This covers access for various groups including the emergency services and council services.

Part 2c: Congestion on boundary roads

This covers data on congestion on boundary roads and bus services.

Part 2d: Displaced traffic on local roads
This covers data on displaced traffic in the local area and on local residential streets.

Part 2e: Air quality

This provides an overview of the air quality data in the area before and after the Liveable Streets closures.

Part 2a: Impact on disabled residents

The implementation of the Liveable Streets programme in Bethnal Green resulted in fundamental changes to the road networks ability to serve the local community. This was primarily due to the closure of a series of B roads which served to enable access between the main boundary roads and smaller residential streets.

Under section 122 (part a) of the Road Traffic Regulation Act 1984 (RTA), it is the duty of every highways authority to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians). For part a) of section 122, this includes the desirability of securing and maintaining reasonable access to premises.

Waverley and Bethnal Green West are two densely populated wards in Tower Hamlets, which is London's most densely populated borough. These densities place

a high level of demand for access and the road network is therefore required to meet the access needs generated at these densities.

These needs include access for the emergency services, residents reliant on car use, deliveries and council operations such as a refuse collection and highways maintenance. As B roads, Old Bethnal Green Road and Gosset Street were integral to meeting these needs before their closure.

The Bethnal Green Liveable Streets scheme was ambitious in this regard as most examples of low traffic neighbourhoods tend to restrict access from larger roads to address through traffic on smaller residential streets.

Under its public sector equality duty, the council is required in the exercise of

its functions, to have due regard to the need to advance equality of opportunity between people who share a protected characteristic and those who do not.

The Act explains that having due regard for advancing equality involves removing or minimising disadvantages suffered by people due to their protected characteristics. It also involves taking steps to meet the needs of people from protected groups where these are different from the needs of other people.

Access for disabled residents

By its design, the Bethnal Green Liveable Streets scheme sought to encourage active travel by prioritising spaces for walking and cycling, while increasing journey distances for motor vehicles. This disproportionately impacts on residents who rely on the use of motor vehicles and this is recognised in the equalities

impact assessment drafted alongside this consultation process.

Impact of traffic on disabled residents

The removal of the traffic measures and reintroduction of through-traffic may impact disabled people in several ways. It is recognised that disabled people are more at risk from road danger, noise, and air pollution. For people with mobility impairments, the reintroduction of vehicle traffic may reduce their confidence in walking, cycling, using a mobility scooter or accessing public transport. Furthermore, evidence suggests regular exercise to be highly beneficial to those with impairments.

Part 2b: Access for emergency and council services

Access for emergency service vehicles

Since the implementation of the Liveable Streets scheme, there have been multiple incidents across the area where closures have hindered ambulance service and fire brigade access¹. Certain adaptations have been made where removable bollards have been installed replacing permanent closures. However, these are only accessible by the London Fire Brigade using a special key. Access issues remain for ambulances.



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reaching the scene of an incident due to the hard physical closure present on Old Bethnal Green Road between Clarkson Street and Temple Street, E2.

The incident occurred on Sunday 13th February 2022 at approximately 19:50. We had raised the incident on our incident reporting system Datix.

Could I request that the incident is logged by the council against the scheme as part of the ongoing review of LTNs in the area.
Emergency Planning and Resilience Officer
–London Ambulance Service

"We attended a 'smoke issuing' call today at Sandford House, Arnold Circus. The appliances attending entered via Club Row and had difficulty siting the appliances correctly due to the LTN zone and plant pots in place. Luckily, this turned out to be a false alarm but if the incident escalated and an aerial appliance was required it would have proved very difficult, if not impossible, to site it and use it effectively, essentially some residents would not be able to be rescued via the aerial if they are unfortunate enough to be cut off by the LTN."
Station Commander–London Fire Brigade

Ambulance on Old Bethnal Green Road

The three emergency services were consulted on the measures. The ambulance service and London Fire Brigade support the removal of physical closures.

"I wanted to inform you of an incident that has been reported to the LAS from a concerned relative of a patient, where the ambulance response car was delayed

further west. Prior to the changes there was an enormous level of car-enabled ASB. This was due to the spill-out from the Shoreditch night time economy"
– Safer Neighbourhood Team

Access for operational council service vehicles

The network management, highways maintenance and refuse collection services were consulted for the first stage consultation in the summer of 2022. They each raised concerns regarding the Bethnal Green Liveable streets closures.

Network Management: The council has a duty to coordinate street works while ensuring network resilience is maintained and that there is efficient and expeditious movement of traffic, as far as possible.

The implementation of the Liveable Streets scheme has presented challenges to effective street works coordination due to the reduction in possible alternative routes. This is particularly critical at the eastern area of the scheme around Old Bethnal Green Road. Residents and businesses in this section can only be accessed through Mansford Street and Temple Street. This presents challenges for re-routing options for planned works and is more concerning when emergency works are involved.

Highways maintenance: There are constant demands placed on the council to temporarily close roads whether it be for its own maintenance operations or for other parties, such as utilities. These closures always require traffic management arrangements to be made in a way that minimises disruption.

This has proven to be more challenging following the implementation of the Liveable Streets scheme. Consultation with the council's highways team has shown that more routine maintenance tasks require temporary road closures due to the reduction in road space and increase in one-way roads. This not only increases disruption but means greater maintenance costs for the council.

Refuse collection services: The council's refuse collection service was also consulted on the scheme. In their response, they supported the removal of the closures as it would improve their ability to undertake their operations. Key concerns are the increased route distances and the requirement to often reverse vehicles at long distances which creates safety issues.

"Where physical barriers are in place, we ask that these be removed as it has affected how we access properties to make collections. The service's general view is that if Liveable Streets are to be achieved successfully, physical barriers are to be avoided."

Senior refuse collection services officer

¹ Full incident log available in the documents section of the Bethnal Green Liveable Streets web page

Part 2c: Congestion on boundary roads

This section will analyse three datasets to understand if congestion has increased on the two main boundary roads of the Bethnal Green Liveable Streets scheme.

The data shows congestion on Hackney Road, particularly east of Warner Place, has increased significantly since the introduction of the Liveable Streets scheme. The data also shows that between 2019 and 2022 there has been no significant increase in congestion on Bethnal Green Road.

This increase in congestion on Hackney Road is attributed to diverted traffic from both sides of Hackney Road where low traffic neighbourhoods have been implemented.

The three sets of data used are:

- DfT travel time delay data
- iBus delay data
- TRL Astrid database data

Travel time delay data

Department of Transport data¹ has been gathered on the delay times on the main boundary roads of the scheme. The data shows a 60% increase in delays on Hackney Road from 2019 to 2021 and 13% increase in delays on Bethnal Green Road. These are significantly higher than delay increases on Whitechapel Road and Commercial Road, which are the two other east west A roads in the borough (see table below).

Impact on bus services
In 2018/19, the two bus routes serving Hackney Road provided over twelve million passenger journeys. One of the council's key strategic transport objectives is to encourage public transport use and one of the most important factors influencing bus use is service reliability. Congestion can significantly impact bus reliability and can therefore adversely impact bus use.

Data provided by the TfL network team shows an increase in bus journey times on Hackney Road and Bethnal Green Road between 2019 and 2022. The latest data for 2022 shows Bethnal Green Road bus journey times did increase in 2021 but they are now down to pre-closure levels. For Hackney Road east of Warner Place,

the increase in congestion and bus journey times remains in 2022 and this is throughout the day.

More detailed iBus data is available in the documents section of the Bethnal Green Liveable Streets web page.

Road Name(s)	Average delay (second per vehicle per mile)			Change on 2019
	2019	2020	2021	
Hackney Road	136.0	207.1	218.7	60.81%
Bethnal Green Road	164.0	156.5	186.1	13.48%
Whitechapel Road/ Bow Road	155.0	137.8	169.7	9.48%
Commercial Road	158.0	179.0	167.6	6.08%
Cambridge Heath Road	172.9	165.4	171.1	-1.04%
Commercial Street	275.7	219.9	215.6	-21.80%
Highway/ Limehouse Link	120.7	74.8	75.3	-37.61%



2022 compared with 2019/20
- AM Peak (0700-1000)



2022 compared with 2019/20
- Inter Peak (1000-1600)



2022 compared with 2019/20
- PM Peak (1600-1900)

Journey Time per KM change



1. <https://www.gov.uk/government/statistical-data-sets/average-speed-delay-and-reliability-of-travel-times-cgn>

Part 2c: Congestion on boundary roads

TRL Astrid data for boundary roads

This data is not derived from traffic counts but from detectors on traffic signals which calculate an approximate number of vehicles based on how long the detector is occupied. They can be at risk of inaccuracies during busy times when static vehicles but provide a useful comparison of data from before and after the implementation of the liveable streets scheme.

The three locations the council has obtained data for are:

- Hackney Road/Queensbridge Road
- Hackney Road/Cambridge Heath Road
- Bethnal Green Road and Vallance Road

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The data shown on this page is for the PM peak (4pm-7pm) at all three locations.

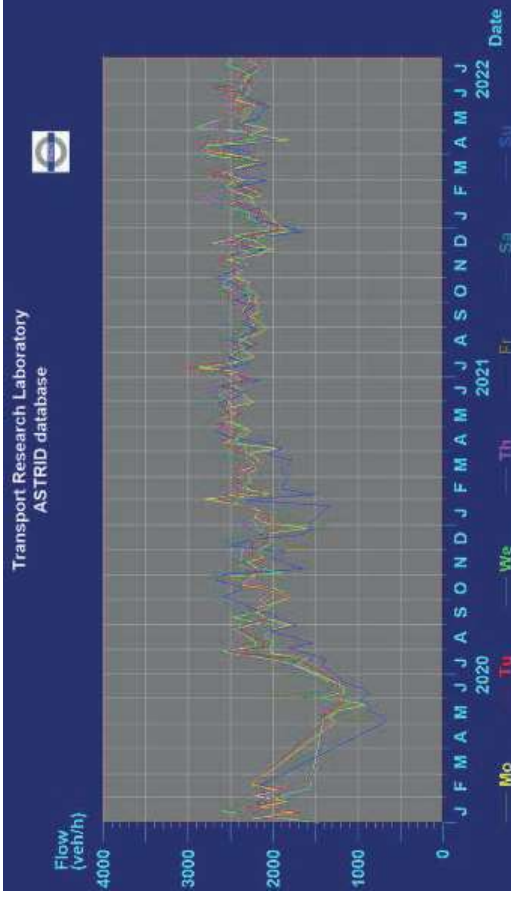
It shows the following trends:

Hackney Road/Cambridge Heath Road: Data shows a significant increase in traffic flows with all flows below 5000 in early 2020 compared to nearly all flows close to or exceeding 6000.

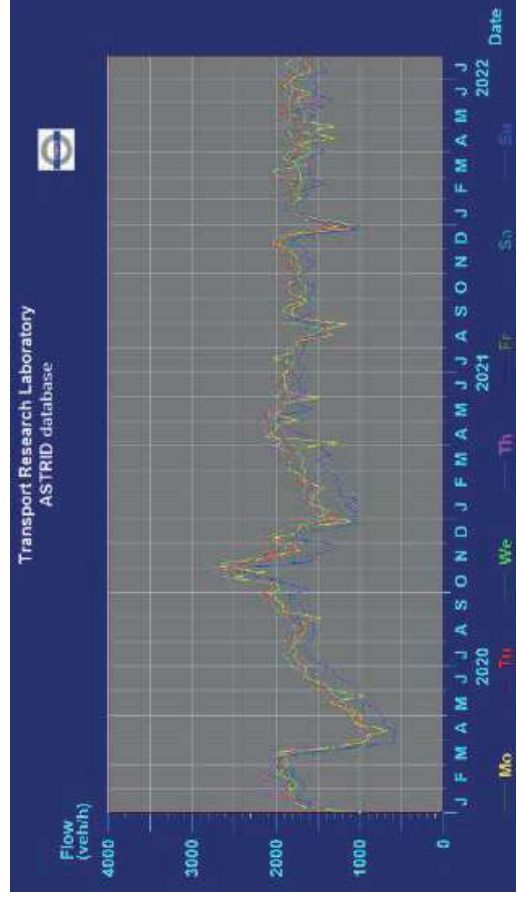
Hackney Road/Queensbridge Road: February 2020 flows were concentrated around 2000 in February. These flows were more concentrated around the 2500 level in February 2022.

Bethnal Green Road/Vallance Road: Traffic levels have largely remained the same with some negligible reduction.

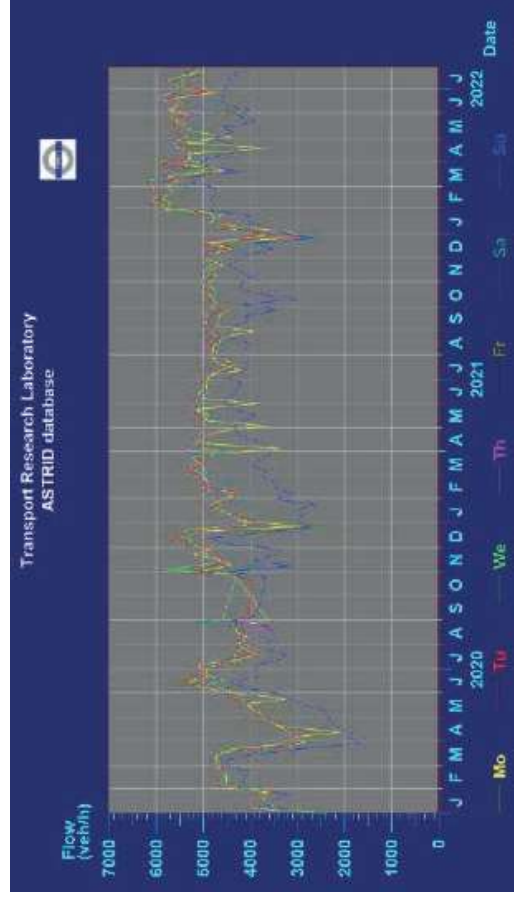
The full set of data for all three junctions is available in the documents section of the Bethnal Green Liveable Streets web page.



Hackney Road/Queensbridge Road: Total vehicle flows 4pm-7pm



Bethnal Green Road/Vallance Road : Total vehicle flows 4pm-7pm



Hackney Road/Cambridge Heath Road: Total vehicle flows 4pm-7pm

Part 2d: Displaced traffic on local streets

Traffic flows on local streets

Traffic count data¹ from 2019 and 2022 shows reductions and increases in traffic flows at various locations across Bethnal Green.

Traffic has reduced significantly on Old Bethnal Green Road which saw an 86% reduction in eastbound flows and 70% reduction in westbound flows. The western end of Columbia Road also saw a significant reduction in traffic of 53% in the eastbound and 59% in the westbound. There were also reductions on other streets including Squirries Street, Temple Street and Ravenscroft Street.

There were however streets which saw increases in traffic. The most significant roads from this list are Swanfield Street and Virginia Road which saw northbound traffic flows increase 209% and 55% respectively. Smaller densely populated residential roads such as Horatio Street and Ropley Street have seen increases in traffic of 70% and 89% in the northbound direction. These are directly attributable to the closures of the junction of Gosset Street and Columbia Road.

		Traffic flow changes between 2019 and 2022			
		Direction	Change in traffic	Direction	Change in traffic
Ravenscroft Road		NB	-9%	SB	-48%
Horatio Street		NB	70%	SB	278%
Ropley Street		NB	89%	SB	-11%
Temple Street		NB	-28%	SB	-76%
B118 Old Bethnal Green Road		EB	-86%	WB	-70%
B108 Warner Place		NB	12%	SB	-9%
B108 Squirries Street		NB	-16%	SB	-24%
Columbia Road		EB	18%	SB	-43%
B118 Columbia Road		EB	-53%	WB	-59%
Virginia Road		EB	55%	WB	20%
Swanfield Street (North)		NB	209%	SB	80%

¹: Traffic count data is available in the documents section of the Bethnal Green Liveable Streets web page

Part 2e: Air quality

Air pollution is associated with several adverse health impacts: it is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. The UK Clean Air Strategy released in 2019, provides the overarching strategic framework for air quality management in the UK and contains national air quality standards and objectives established by the government to protect human health. The strategy objectives take into account EU directives that set limit values which member states are legally required to achieve by their target dates. UK legal limits for nitrogen dioxide (NO₂) are 40 µg/m³ (micrograms per cubic metre) annual mean.

NO₂ data from within the scheme and boundary roads was collected and compared with similar roads and streets in other parts of the borough. The data showed significant reductions between 2019 and 2022 across the borough, including the roads on the boundary and within Bethnal Green.

Improved air quality on boundary roads
Average NO₂ levels reduced by 20.13% on Bethnal Green Road and 23.29% on Hackney Road compared to 20.93% for the comparable A roads in the Borough.

For Hackney Road average NO₂ levels have reduced at a higher rate than the other A roads in the borough. For Bethnal Green Road they reduced at a lower rate than the other A roads in the borough. These differences are negligible and it

shows the increase in the congestion on Hackney Road and reduction in traffic on Bethnal Green Road not having a significant bearing on NO₂ levels.

Improved air quality on local roads
Average NO₂ levels reduced by 28.01% from the three NO₂ monitoring sites in the scheme area. This is higher than comparable locations in other parts of the borough which have not had road closures.

Comparing the two sets of data, there is an indication that most of the reductions in NO₂ emissions are due to ULEZ and cleaner vehicles as significant reductions have also occurred elsewhere in the borough. But the difference between the two can be attributed to the traffic reduction observed around each of the monitoring sites. It is however important to note that the monitoring stations in the scheme area are located where there have been significant reductions in traffic. There are no NO₂ monitoring stations on Swanfield Road, Virginia Road or Horatio Street where there have been significant increases in traffic.

Conclusions

The data is therefore inconclusive as to whether the introduction of the closures in the Bethnal Green area have had a significant impact on air quality levels. The data suggests ULEZ and cleaner vehicles have been far more effective in reducing emissions than the closures and in some areas, air quality has improved despite increases in congestion and traffic. Council action on air quality will need to focus on addressing congestion particularly on

high trafficked roads, encouraging less car use through encouraging the take up of alternative modes and the adoption of cleaner vehicle technology.

These reductions in NO₂ across the borough should address concerns around the impact on air quality resulting from the removal of closures. The increase in traffic levels in areas such as Bethnal Green Road and Gosset Street are unlikely to have a significant impact on air quality. To address these concerns, the council is committed to establishing a framework for monitoring any air quality impacts from option 1.

A new air quality monitoring framework

NO₂ is not the only pollutant from traffic that is of concern, Particulate matter (PM) is everything in the air that is not a gas and therefore consists of a huge variety of chemical compounds and materials, some of which can be toxic. It will be important to measure the fractions of PM where particles are less than 10 micrometres in diameter (PM₁₀) and less than 2.5 micrometres in diameter (PM_{2.5}) based on the latest evidence on the effects of PM to health. PM is not currently monitored by the council in the area but if option 1 is implemented, we will develop a robust monitoring framework to assess the impact of option 1 on NO₂, PM_{2.5} or PM₁₀ levels. This will include new and more accurate monitoring equipment where required.

All values are in NO₂ micrograms per cubic metre (µg/m³)

Bethnal Green Road				
Location	2019	2022	Percentage Change	Absolute Change
Buckfast St/Bethnal Green Rd	32.48	23.9	-26.72%	-8.68
Paradise Row/Bethnal Green Rd	36.01	28.4	-18.36%	-6.61
Bethnal Green Rd/Brick Lane	36.59	30.98	-15.31%	-5.6
Average			-20.13%	-6.96

Hackney Road				
Location	2019	2022	Percentage Change	Absolute Change
Warner Place/Hackney Rd	35.44	26.7	-24.66%	-8.74
Queensbridge Rd/Hackney Rd	35.26	27.53	-21.92%	-7.73
Average			-20.13%	-6.96

Comparable east-west A roads elsewhere in Tower Hamlets				
Location	2019	2022	Percentage Change	Absolute Change
Whitechapel High St (KFC)	47.84	41.31	-13.65%	-6.53
Whitechapel Rd/Adler St	40.33	30.75	-23.75%	-9.58
Whitechapel Market	53.51	41.1	-23.19%	-12.41
Harford St/Mile End Rd	36.11	29.49	-18.33%	-6.62
Globe Rd/Mile End Rd	42.28	36.38	-16.32%	-5.9
Phsea St/Commercial Rd	34.76	24.45	-29.66%	-10.31
Chrisp Street/E India Dock Road	38.73	32.22	-16.81%	-6.51
Average			-20.63%	-7.91

Bethnal Green scheme area local roads				
Location	2019	2022	Percentage Change	Absolute Change
Columbia Rd/Gosset Street	32.74	23.4	-28.53%	-9.34
Calvert Ave/Boundary Street	34.66	25.9	-25.27%	-8.76
Squirrels St/Gosset St	37.55	26.2	-30.23%	-11.35
Average			-28.01%	-9.82

Comparable east-west A roads elsewhere in Tower Hamlets				
Location	2019	2022	Percentage Change	Absolute Change
St Stephen's Rd/Treedegar Rd	38.66	30.73	-20.51%	-7.93
Brick Lane/Princes St	32.17	25.5	-20.73%	-6.67
Roman Rd/Globe Road	34.13	28.52	-16.44%	-5.61
Average			-18.23%	-6.74

Part 3: Guide to responding to this consultation

A paper survey has been sent with this document as part of this consultation. Your views are important to us and we want everyone to have their say.

Using your response reference number

All paper surveys sent out to residents within the consultation boundary will have a response reference code. These are to be used for online responses if that is your chosen method of response. This code is for the household and can be used for responses from each member of the household.

Have your say by contributing by:

1

Paper survey (sent with this leaflet) sent via post in the freepost envelope provided.

2

Online via **talk.towerhamlets.gov.uk/LSBethnalGreen**.

The online survey is open for all to respond to. Residents and businesses who have received a paper copy of the survey should use the response reference code on the survey.

Page **120**

Please provide your feedback by **12:59pm on Sunday 12th February 2023**. Visit our website **talk.towerhamlets.gov.uk/LSBethnalGreen** for more information on the plans

Appendix : How you responded to the Old Bethnal Green first stage consultation

First round public consultation results

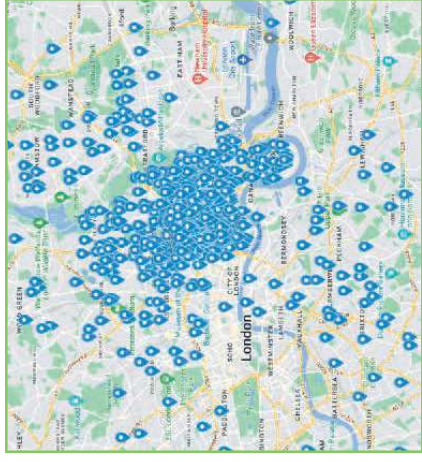
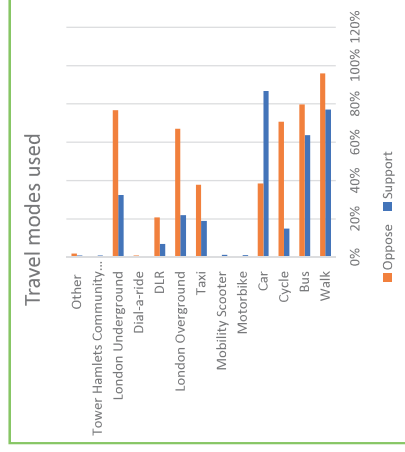
The public consultation was conducted between Wednesday 6th July and Sunday 7th August 2022. Consultation packs were delivered to 4,615 residential and business addresses within the consultation area shown below.

A total of 4,145 responses were received and 34% (1,408) of these were from within the scheme area. Responses which used the resident code sent out across the scheme area totaled 974 or 24% of all responses.

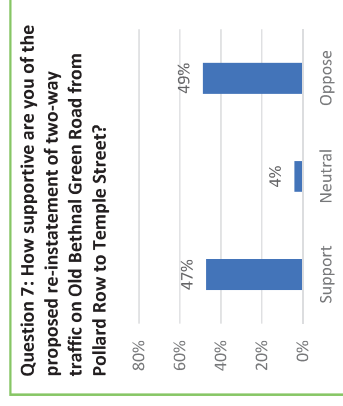
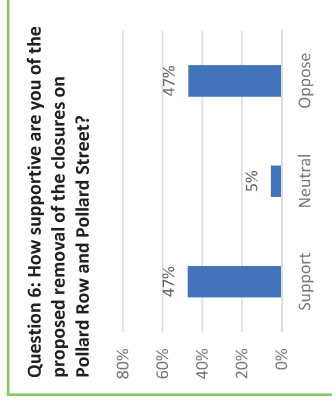
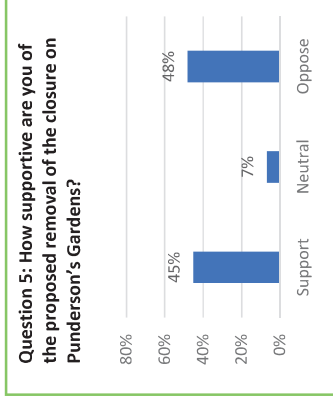
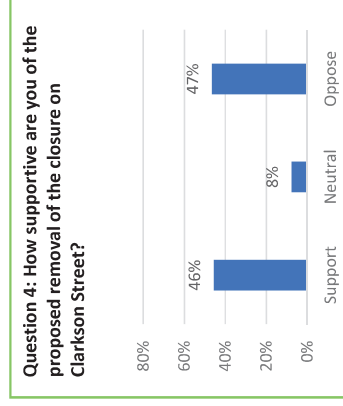
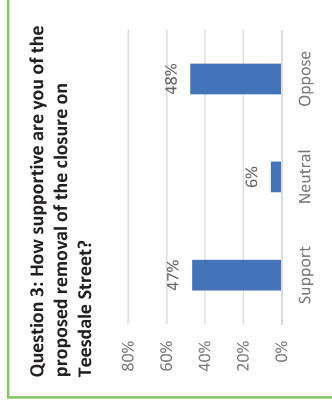
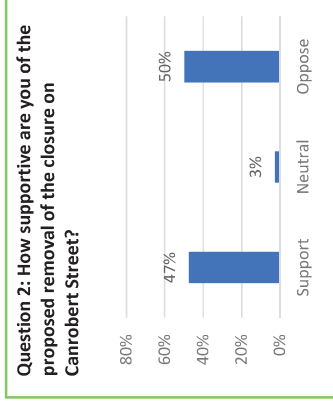
A total of 2,727 responses were received from outside the scheme area. These include other parts of Tower Hamlets with high concentrations in Bow and the Isle of Dogs. Responses were also received from other London borough with high levels of responses from Hackney, Waltham Forest, Islington and Lambeth.

Responses from within the scheme area

This page sets out responses to the travel mode question and the key questions around each of the traffic management changes set out in the first-round consultation document. These responses are from residents that used the resident reference code.



Distribution of responses

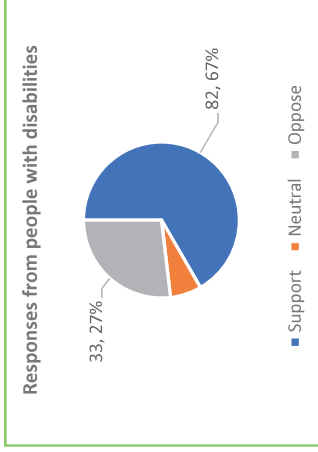


Appendix : How you responded to the Old Bethnal Green first stage consultation

Demographic information

The responses to the questions were almost always consistent with each other. Those who were in support of the proposals in one location were almost always also in support of the proposals in other locations. Analysis of the demographic information from the responses received for Question 1 as an indicator of broad support or opposition for the wider set of proposals to remove the closures.

Analysis of these responses indicates a majority of respondents with disabilities showed support for the proposals (67%).



Age

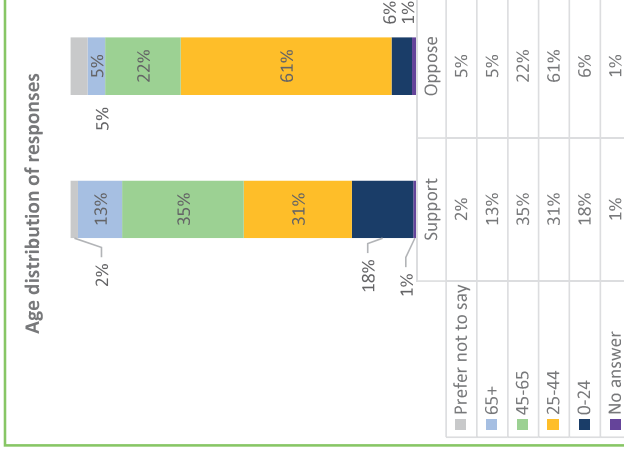
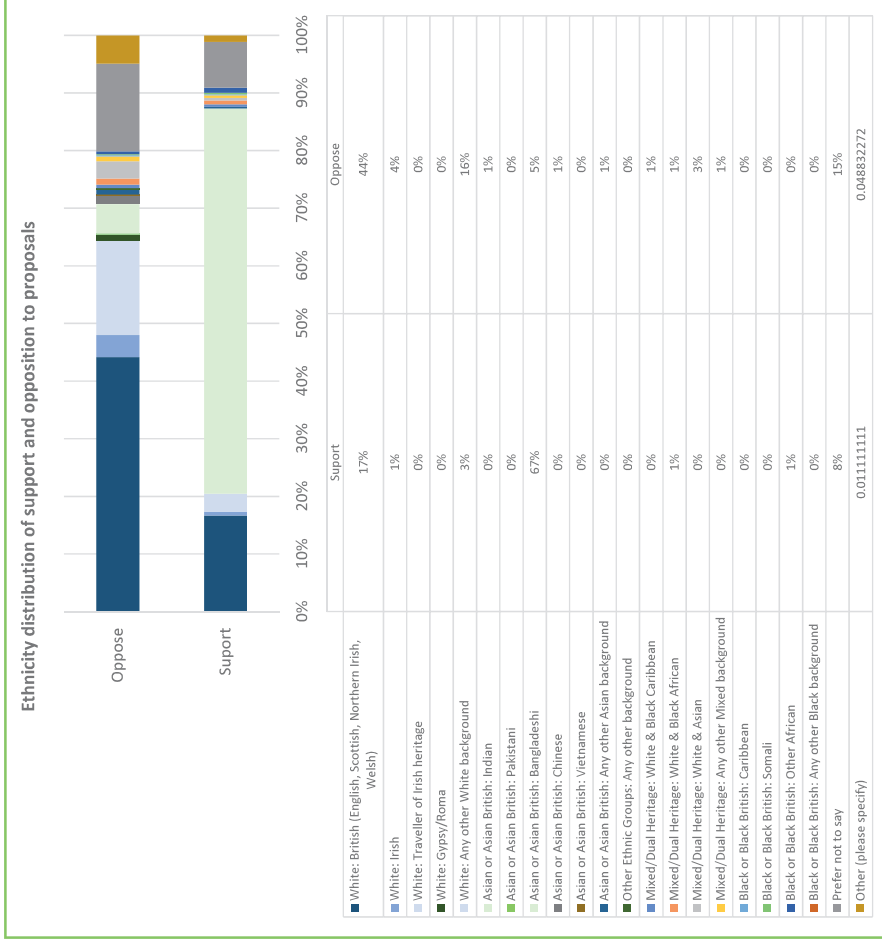
The age profiles differed in terms of responses from those from younger and older respondents. For those opposed to the removal of closures 27% were over 45 and 5% over 65. This compares to those in support of closure removal where 48% were over 44 and 13% over 65.

Ethnicity

The ethnicity profiles differed in terms of responses from a white background and responses from a Bangladeshi background. Those from a white background represented 64% of responses opposed to the removal of the closures compared to 21% in support. Those from a Bangladeshi background represented 5% of responses opposed to the removal of the closures compared to 67% in support.

Disability

From the 1408 respondents, 123 stated they have long-standing illness or health condition. The chart below shows the distribution of support and opposition to the proposal set out in Q1. (How supportive are you of the proposed removal of the closure on Old Bethnal Green Road?).



Appendix : How you responded to the Old Bethnal Green first stage consultation

Consultation feedback

For the first stage of the consultation, we received over 2,800 responses both in support and opposed to the proposals to remove the Liveable Streets closures.

We also engaged with key stakeholders including the emergency services, local businesses, TfL, market traders and local schools. Below are a series of key themes from the responses received from stage one of the consultation.

Key themes from those opposed to the removal of closures set out in stage 1 of the consultation:

Traffic impact: The main theme around the opposition to the proposals relates concerns around increasing traffic levels. Many feel that by reducing traffic levels, the area has become safer, cleaner and more pleasant to live in due to the reduction in the adverse impacts of high traffic levels. These are repeated frequently through the responses but are predominantly air pollution, noise and road safety.

- Antisocial Behaviour (ASB): Respondents opposing the proposals also state that ASB has reduced since the road closures were installed and this is particularly the case around Arnold Circus where there are concerns the ASB issues relating to nighttime activity will return if Arnold Circus is reopened to traffic.

- Cost of proposals : There is another key theme around concerns on the costs of the project. It is felt that a significant amount of money has been spent on the closures and the money to reverse them could be better spent elsewhere.

Key themes from those in support of the removal of closures set out in stage 1 of the consultation:

- Increased congestion and pollution: The most predominant key theme from respondents supporting the removal of closures related to the increased congestion in the wider area.

Increased journey times for those dependent on the use of a car: Respondents who felt they were reliant on the use of a car support removal of the closure on the grounds of reducing their journey times and reliance on the use of congested boundary roads, particularly Hackney Road. These included parents, those providing care and residents whose occupations required the use of a car such as private hire and delivery drivers.

- Feel unsafe at night: There are a few responses which refer to the in impact of safety perception in the area due to the reduced natural surveillance available when there is general traffic flow.
- Access to services/mobility: Another key theme is concerns around loss of access

to essential services for those who access them by car. This can be either through their own car or through a care giver or taxi. This is predominantly access to health services including GP and hospital appointments.

- Impact on emergency vehicle access and response times: Respondents supporting the proposals raised the issue of emergency service vehicle access
- Antisocial behaviour (ASB): Respondents supporting the proposals raised concerns about the increase in anti-social behaviour since the road closures were installed. This refers to the increase in drug dealing and other criminal behaviour.

A Better Bethnal Green

Public consultation
on transport
changes in Weavers

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TOWER HAMLETS



Mayor's Foreword

The transport network is a vital part of everyday life. It enables people to make their regular journeys to and from home for work, study, leisure, socialising or shopping and provides essential means of access to healthcare and welfare services. Businesses rely on transport to bring employees and customers to their premises and convey their goods and services. It enables family to travel to vulnerable relatives and provide a network of community and support. An efficient and sustainable transport system is vital for addressing issues relating to public health, air quality, accessibility and growth.

When the Liveable Streets scheme was first implemented, concerns were raised which included among other things, access for people reliant on vehicle use and emergency service vehicles. There were also concerns regarding the impact on local bus services, access to families and support networks, and of displaced traffic on areas surrounding the scheme's locations.

The scheme has been in place for nearly 18 months, and this has allowed for an analysis against its key objectives and consideration on the impacts on all residents and stakeholders. For parts of the scheme, it has reduced some traffic levels and improved the public realm in a way that makes it safer for walking and cycling. The public realm schemes on Old Bethnal Green Road and Columbia Road have resulted in reductions in traffic levels in the areas around them.

However, we have received strong feedback from residents and stakeholders reporting adverse impacts from the

scheme. Data shows that there has been an adverse impact on local bus services and displaced traffic on local and boundary roads. Concerns regarding access to vital familial and social networks, as well as an economic impact on small businesses – ranging from shops to taxi drivers, market stallholders to delivery men and women – have also repeatedly been raised with the council. Working with stakeholders such as the emergency services has shown there have also been adverse impacts on access. In the summer of 2022, the council undertook a first stage consultation to gain a better understanding of public opinion on the Liveable Streets scheme. We have received strong feedback from residents and stakeholders which has allowed us to develop our proposals further.

I am pleased to present this document which is the next stage in our consultation on proposals to address matters that have been raised regarding the Liveable Streets scheme and make transport changes across the Bethnal Green area. This second stage consultation provides more detail on our proposals and the data which supports them.

Our key objective is to create healthier streets, with improvements to accessibility and road safety while restoring access for key services and residents reliant on their cars. All residents and other stakeholders are encouraged to have their say and respond to this consultation and help us shape our proposals.



Mayor Lutfur Rahman



This consultation

We are consulting on whether to implement a series of changes that have been developed following engagement with key stakeholders and data analysis (see part two of this document).

The proposed changes are focused on the following:

- Improving access for all
- Improving conditions for active travel across the whole area
- Improving the conditions for public transport use through improved performance and access
- Reduced traffic on unsuitable roads
- Ensuring local businesses and keyworkers are not adversely impacted
- Improving access for emergency Vehicles
- Contributing to improved air quality through encouraging active travel and public transport use

Structure of this document

Part 1 of this consultation sets out the course of action the council is considering.

Part 2 sets out the data that has been considered in developing the options in the consultation. It presents a combination of data and feedback from the first stage of consultation held in the summer.

Part 3 provides guidance on responding to this consultation.

Introduction

In 2019, The London Borough of Tower Hamlets launched the Liveable Streets Programme. The key objective of the scheme was to improve the look and feel of the area by upgrading the public realm and enhancing conditions for walking and cycling.

The Liveable Streets scheme in Bethnal Green involved a series of road closures and directional changes to traffic. It also included a series of public realm enhancements to Columbia Road and Arnold Circus and a new pocket park on Old Bethnal Green Road.

The map opposite shows the full set of interventions which were approved under the scheme which was not completed. The following elements were yet to be implemented:

- Warner Place and Squirries Street to made one way northbound
- Road closure on the junction of Gosset Street and Warner Place
- Road closure on the junction of Virginia Road

The Liveable Streets scheme was implemented in phases and these final elements were delayed due to a review of the scheme which was announced in September 2021. Further engagement was undertaken with residents and other stakeholders and as well as additional traffic counts. The council considered completing the scheme but has decided not to proceed with this due to the likely impact of displaced traffic. This is covered in more detail in the next page of this document.



Original Bethnal Green Liveable Streets scheme map

The Options

The council has undertaken an evaluation of the Liveable Streets scheme by gathering and analysing data from various sources and engaging with key stakeholders.

Below we set out options which have been developed for respondents to consider. Option 1 sets out a series of changes which seek to address issues that have been identified. Option 2 is for retaining the current scheme and its benefits. We also set out below other options that were considered and the reasons they were not taken forward.

Option 1: Remove the Liveable Streets closures and implement a series of areawide improvements to encourage active travel

This option would seek to strike a balance between traffic restrictions and essential access for disabled residents, the emergency services and various council services such as maintenance and street works coordination. It would also seek to address traffic congestion and bus service delays on Hackney Road (see page 14).

Option 2: Retain the current scheme

This option is for no changes to be made to the area. For some parts of the area, the Liveable Streets scheme has largely been successful in reducing traffic levels and improving the public realm in a way that makes it safer for walking and cycling. Traffic levels shown on page 13 of this document show the streets in the area which have benefitted from reduced traffic. These include streets that are close to

some of the schools in the area. The data also shows that traffic levels have fallen for the area as a whole.

The pocket park on Old Bethnal Green Road and new public realm on Columbia Road have resulted in significant improvements to the look and feel in those areas with new planting, trees and seating.

Other options considered

The council has considered other options which will not be taken forward. These are completing the originally approved scheme with more closures or replacing physical closures with cameras. These are discussed below.

Completing the Liveable Streets scheme by installing the two remaining closures

Some of the issues with displaced traffic on local roads are due to an incomplete approved scheme. The original approved scheme included further closures on Virginia Road and Gosset Street.

In April 2022, daily traffic flows were 5,142 on Swanfield Street and 6,495 on Warner Place. Some of these are local resident trips, but the majority would be through traffic. Closing these two roads with physical closures would effectively divert most of these 11,500 vehicle trips onto Hackney Road and Bethnal Green Road, which would exacerbate the issues we have seen on Hackney Road, particularly the impact on bus services.

This approach would also worsen the access issues that have been shown to be experienced by the emergency services and disabled residents.

Replacing physical closures with cameras

This would address the access issues that come with the above option but the issues of displaced traffic would remain.

The benefits of each option

Option 1: Remove the Liveable Streets closures and implement a series of areawide improvements to the public realm to encourage active travel	Option 2: Retain the current scheme
Benefits	Benefits
Improved access for those reliant on car travel including key workers and those who use car travel as their main source of income	Lower traffic levels on Old Bethnal Green Road and Gosset Street
Improved access for emergency vehicles, deliveries and council services	Better for cycling: There is existing segregated westbound cycling provision on Old Bethnal Green Road between Clarkson Street and Mansford Street. This would be removed if option 1 was to be implemented
Improved road network resilience	There are four schools along Old Bethnal Green Road and Gosset Street which currently benefit from reduced traffic levels from the closures
Improved access for businesses	
Improved bus service performance through less congestion on Hackney Road and Bethnal Green Road	Air quality has improved within the scheme area at a higher rate than in other comparable areas in the borough
Lower traffic levels on Swanfield Street, Virginia Road and Ropley Street	
Increased planting, trees and seating in the area as result of the new pocket park and other public realm improvements across the area	

Option 1: Columbia Road and Jesus Green

Option 1

Option 1 has been developed following consideration of the feedback from the first stage consultation, engagement with stakeholders and analysis of the available data. The evidence and rationale behind these proposals is explained in more detail in part two of this document.

They seek to address many of concerns raised while making improvements to access and active travel.

The key principles behind to option 1 are:

- Improved access
- Addressing the impacts of displaced traffic
- Improving conditions for walking and cycling for the whole area

Option 1 would work collectively to address issues of access and displaced traffic to other parts of the scheme area.

Junction of Columbia Road and Gosset Street

Option 1 includes the removal of the closures on this junction and replacement with a one-way southbound link to Gosset Street. The one-way section of Gosset Street would continue to the Mulberry Academy car park entrance. A particular benefit of this is that it enables improved access for larger vehicles that serve the Mulberry Academy, such as coaches, and delivery vehicles and for businesses on Columbia Road, such as the Bird Cage. There have been incidents where larger vehicles have struggled to leave the area due to limited turning space on Wellington Row as the only way out.

Removal of closures

Option 1 includes the removal of the existing closures on Quilter Street and the junction of Wellington Row and Barnet Grove.

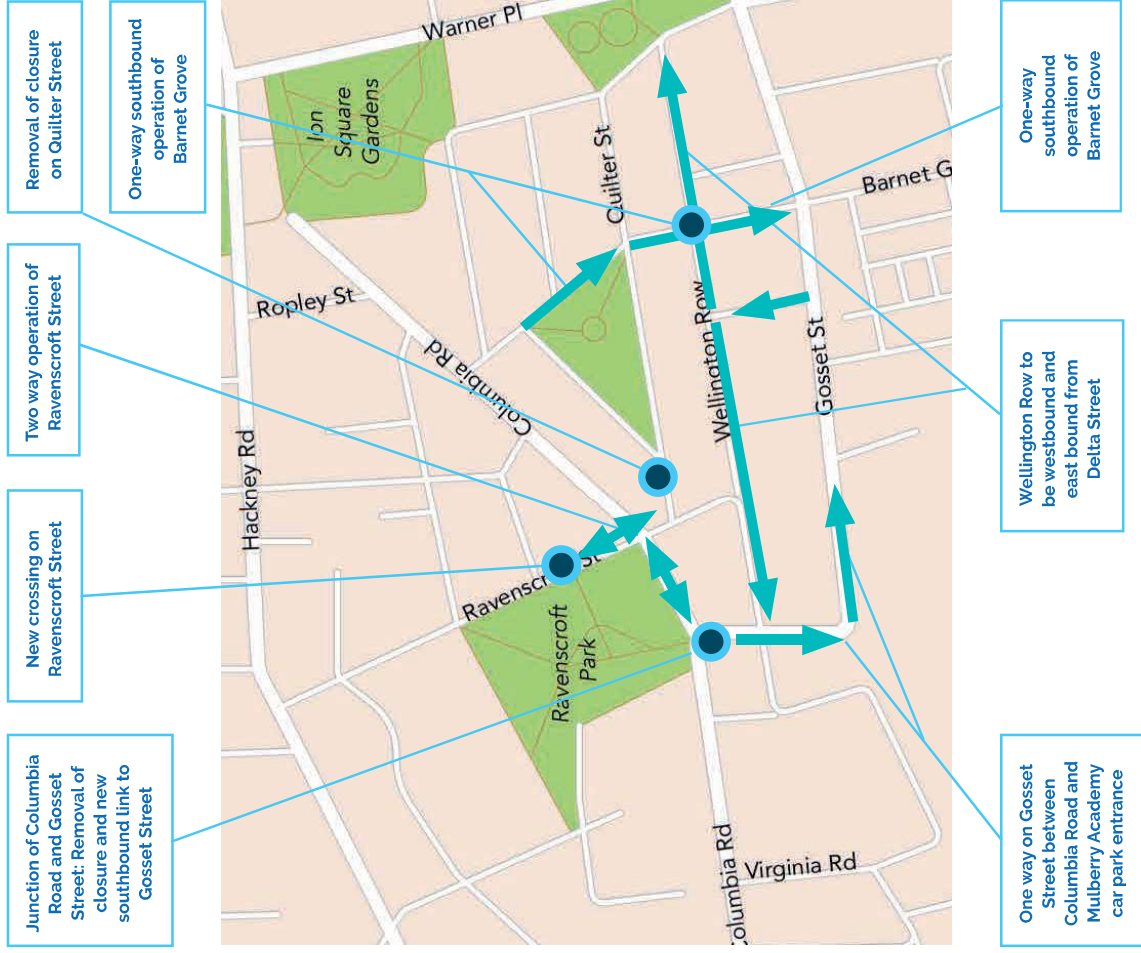
New one-way system

Option 1 includes changes to direction of some streets in the area. These include:

- Wellington Row would be one way westbound from the junction of Delta Street to the junction with Gosset Street.
- Wellington Row would be one way eastbound from the junction of Delta Street to the junction with Durant Street.
- Barnet Grove one way southbound between the junction of Elwin Street to the junction with Barnet Grove.
- Columbia Road two-way between the junction with Chambord Street and Ravenscroft Street.

New crossing on Ravenscroft Street

Option 1 includes a new crossing on Ravenscroft Street to improve crossing from the Columbia Road Primary School entrance to Ravenscroft Park.



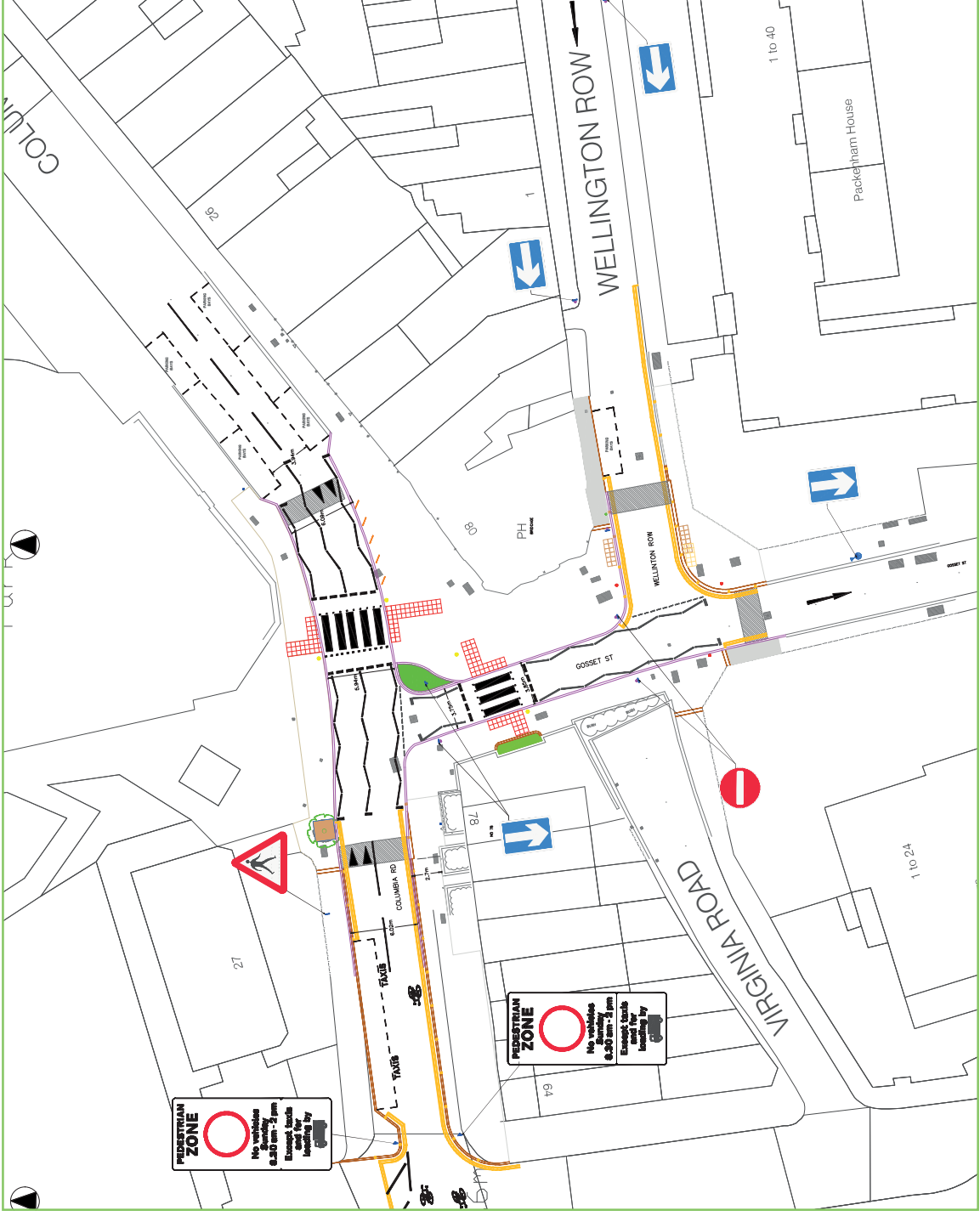
Option 1: New public realm design on the Columbia Road / Gosset Street

Option 1

Option 1 includes a new southbound route at the Columbia Road/Gosset Street junction. Wellington Row would be one way westbound from Delta Street so there would be a banned right turn at the junction with Gosset Street. Access to Columbia Road could be achieved through Durant Street and Baxendale. This design also includes two new zebra crossings on the Columbia Road/Gosset Street junction.

Closure during Sunday market operating times

Columbia Road market traders were consulted for the first stage consultation in the summer of 2022. Traders felt strongly that the pedestrian space on the junction of Columbia Road and Gosset is integral to pedestrian safety and the overall shopping experience for customers. Option 1 would therefore include the closure of the junction to general traffic during market times.



Option 1: Arnold Circus

Option 1: Existing situation

In 2020 the council approved a pedestrian public realm scheme on most of the circus, and in November 2020 construction of this scheme was halted due to strong local opposition.

Planters were subsequently put in place on a temporary basis while design concerns around heritage could be resolved. The circus is now traffic free except for access from Calvert Avenue to Navarre Street, which are the two western arms of the roundabout.

The space is currently presenting the council with various challenges due to the temporary nature of the materials used. The planters are incurring increasing annual maintenance costs, and temporary fencing and signage is routinely illegally moved. This requires the frequent re-statement by the council's street works contractor presents an ongoing road safety issue.

Proposed removal of closures

Option 1 includes the following changes:

- Removal of closures at each arm of Arnold Circus
- Restoration of Arnold Circus as a roundabout
- Removal of the closure on the junction between Old Nichol Street and Boundary Street
- Two-way operation of Navarre Street
- Restoration of two-way operation of Calvert Avenue

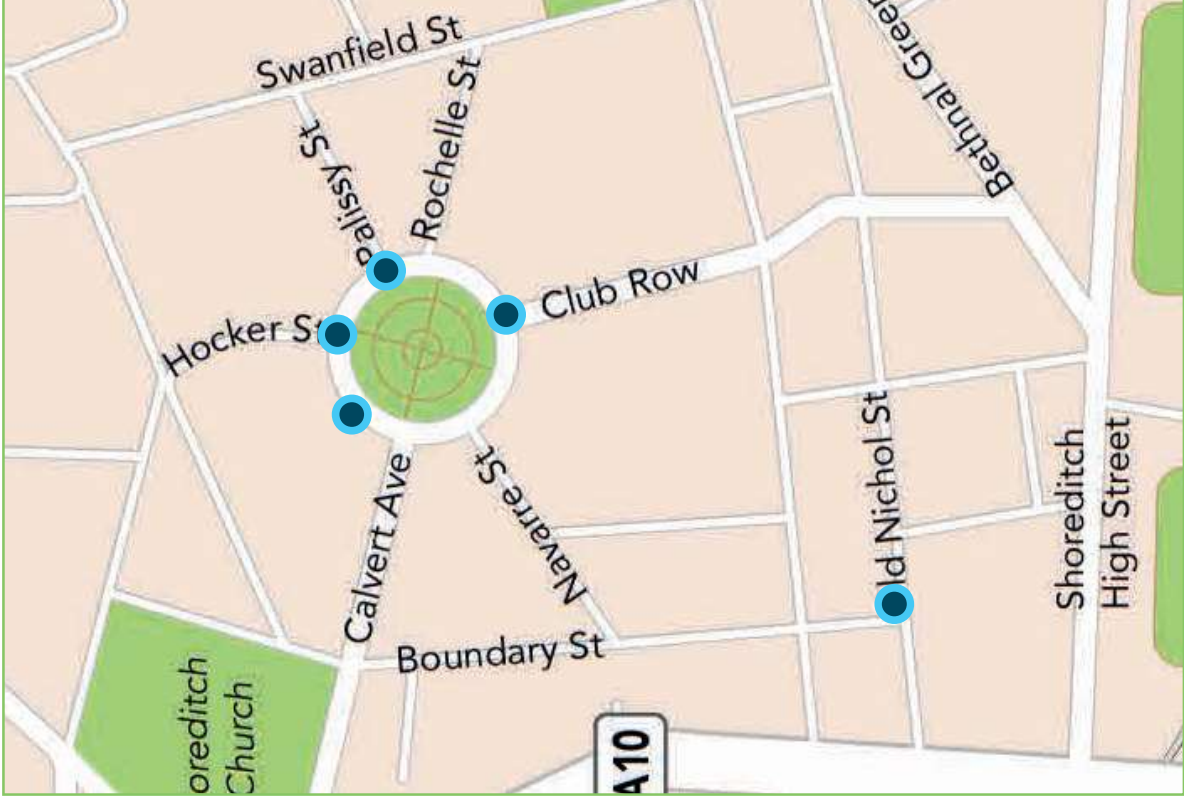
The key benefit of these proposals is they would address the significant increase in traffic levels on Swanfield Street and Virginia Road. More detail on this issue is given in part 2b of this document.

Improvements for bus services

The closures on Arnold Circus meant that the bus stand in Calvert Avenue (on the Hackney side) could no longer be used to terminate buses. This caused pressure on other bus stands in the area and prevented additional buses being put into service at times of disruption. The restoration of Arnold Circus as a roundabout would address this issue.

Addressing Antisocial Behaviour

There have been concerns raised by residents and the police regarding anti-social behaviour related to nearby nightlife. These proposals therefore include the installation of CCTV cameras to address this concern.



Closure to be removed

Option 1: Improving conditions for public transport use and active travel for the whole area

Improving conditions for public transport

In 2018/19, the two bus routes serving Hackney Road provided over twelve million passenger journeys. Through option 1, we are seeking to contribute to meeting one of the council's key strategic transport objectives to encourage public transport use. We will do this by improving bus service performance and improving access to public transport services.

Improving bus performance

One of the most important factors influencing bus use is service reliability. Traffic congestion can significantly impact on reliability and therefore adversely impact on efforts to encourage increased bus use. By reversing the diversion of traffic onto Hackney Road from the Liveable Streets road closures we will seek to improve bus journey times particularly on the section between Warner Place and Cambridge Heath Road.

Improving access to stations and stops

Half of all walking in London takes place as part of a longer public transport journey¹. Buses are the most accessible form of public transport, and they provide the widest and most comprehensive network of travel options for distances that are too long to walk. High quality and accessible walking routes to stations and stops are therefore integral to encouraging public transport use.

In this document, we set out a series of walking improvements which improve access to public transport across the area.

Improving conditions for active travel

In terms of encouraging active travel, Option 1 seeks to improve conditions across the whole Bethnal Green area.

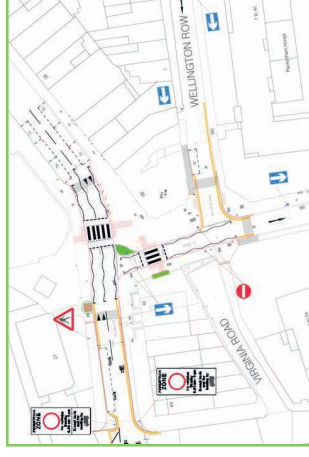
As well as addressing the issue of diverted traffic onto some smaller residential streets, these proposals also seek to make public realm improvements across the area rather than concentrating them in certain areas. All new designs would be in-line with the Healthy Streets approach principles developed by Transport for London (TfL). These are set out in the Healthy Streets diagram shown below.



Improved crossing options

Option 1 includes plans for five new crossings in the scheme area (on Old Bethnal Green Road, Columbia Road and Ravenscroft Street).

Our streets need to be easy to cross for everyone. This is important because people prefer to be able to get where they want to go directly and quickly, so if this is made more difficult, they will get frustrated and give up or choose another way to travel.

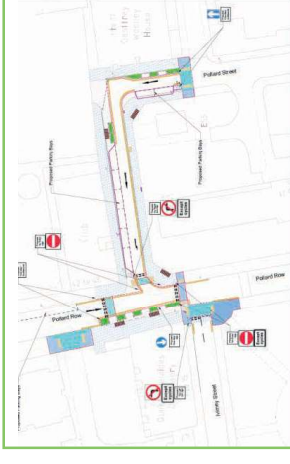


New crossings on Columbia Road and Gosset Street

More planting and trees

Trees and planting can provide multiple benefits to local communities. This includes reducing the impact of climate change and improving the look and feel of the area.

Designs for all changes in the area would seek to result in more trees and planting across the area. Planting and new trees are included in designs for the new public realm scheme on Pollard Row and Pollard Street.



New seating and planting on Pollard Street

Places to stop and rest - more public seating

Seating is essential for creating environments that are inclusive for everyone as well as being important for making streets welcoming places to dwell. Option 1 includes public realm improvements on Old Bethnal Green Road, which would seek to retain seating in the area and the new scheme on Pollard Street would increase in public seating in the area.

Option 1 is also focused in improving access to and around shops in the area. This includes public transport and car access, but also pedestrian access through improved walking links to shops from the wider area.

Option 1: Creating an accessible network of streets

Accessible routes across the area
 A walking network that is accessible can be very effective in encouraging physical activity back into our everyday lives. The lack of physical activity is one of the biggest threats to our health, increasing the risk of developing a range of chronic diseases including diabetes, dementia, depression and the two biggest killers in London – heart disease and cancer.

Furthermore, walking is an integral component of using public transport services. Improving walking routes and making them accessible is key to encouraging the increased use of public transport services for all residents.

Accessible footways

Option 1 includes plans to create a network of accessible walking routes across Bethnal Green. Creating this network would make it easier for residents to access important services including doctors' surgeries, shops and public transport.

The map on this page identifies a first phase of pedestrian improvements we are considering. These improvements include formal crossings such as zebra crossings, which will be located on Columbia Road, Gosset Street and Old Bethnal Green Road;

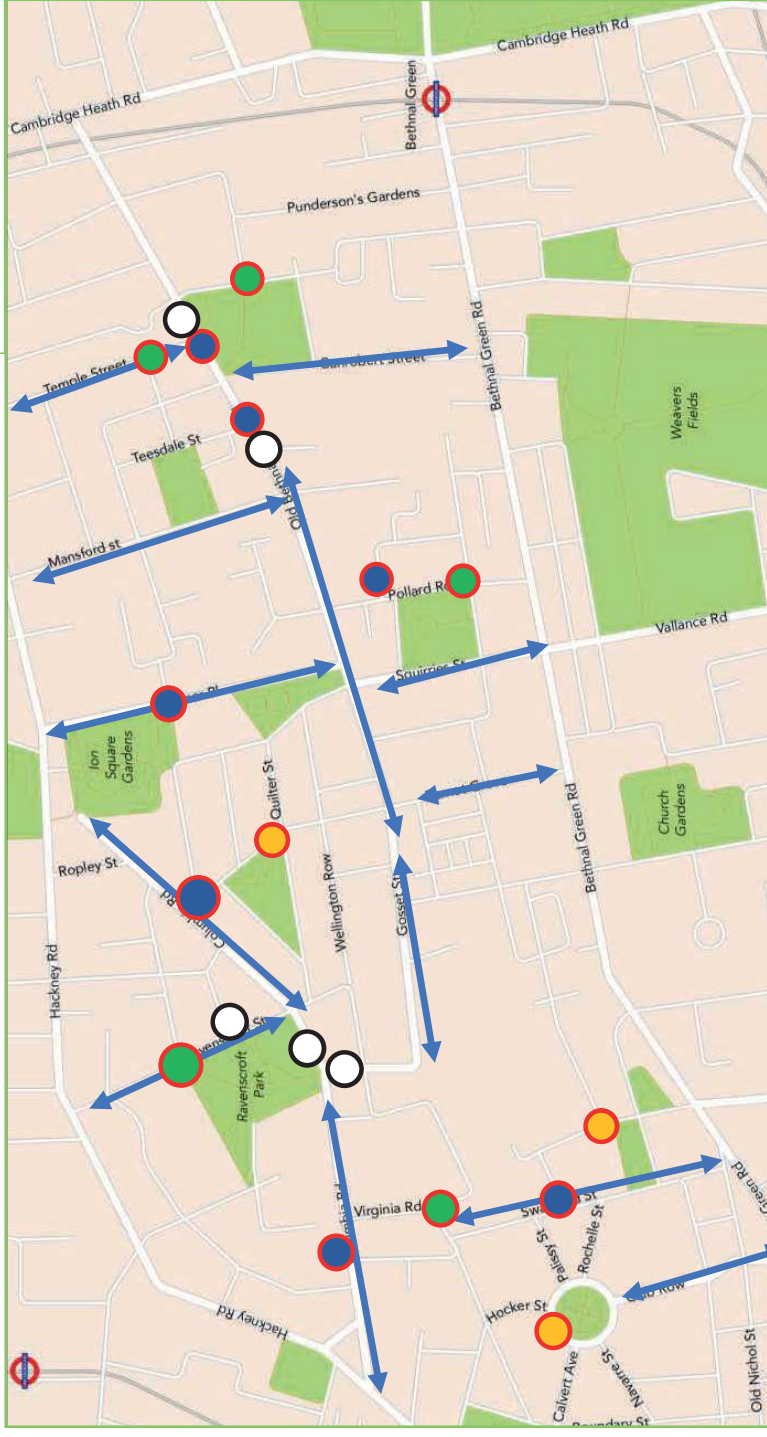
For informal crossing, there are many examples across the area where it is difficult to cross, particularly for wheelchair users. Level or flush access between the pavement and road is essential for most wheelchair users. We would improve crossing points either through dropped kerbs or raised crossings to avoid the need for wheelchair users to make lengthy detours to cross the road.



Lack of dropped kerb on Columbia Road

Route identified for pedestrian improvements

- Route identified for pedestrian improvements (Blue double-headed arrow)
- Raised table (Red circle)
- New continuous crossing (Blue circle)
- New dropped kerbs (Yellow circle)
- New zebra crossing (White circle)



Option 2: Retaining the scheme

For some parts of the area, the Liveable Streets scheme has largely been successful in reducing traffic levels and improving the public realm in a way that makes it safer for walking and cycling.

Reduced traffic levels

Traffic data shown on page 13 of this document shows the streets in the area which have benefitted from reduced traffic. These include streets that are close to some of the schools in the area.

The data also shows that traffic levels have fallen for Bethnal Green as a whole with a reduction of over 9700 vehicle trips.

	Change in traffic from 2019-2022
Wanscroft Road	-455
Horatio Street	346
Ropley Street	284
Temple Street	-1227
B118 Old Bethnal Green Road	-6437
B108 Warner Place	187
B108 Squirries Street	-1862
Columbia Road	-522
B118 Columbia Road	-4807
Virginia Road	1544
Swanfield Street (North)	3253
	-9715

Traffic changes from 2019-2022

Public Realm
The Liveable Street Scheme has resulted in significant improvements to the public realm in various locations in the area. This has often complimented the reductions in traffic and introduced increase planting, trees and seating and facilities for walking and cycling.

Columbia Road/Gosset Street Public Realm
Changes to this junction included closure to traffic and a new public realm with planting and new trees. It is particularly enjoyed on Sundays when the space partly accommodates Columbia Road Market. The space is closed to traffic but retains access for emergency vehicles using a camera restriction over the space.



Public realm on Gosset Street/Columbia Road junction

Arnold Circus
The current arrangement of planters has helped reduce traffic levels significantly. The agreed scheme for Arnold Circus was for a pedestrianised public realm scheme with new surface treatment of the road and new planting and seating. The council was close to commencing construction but received significant opposition from residents and local groups regarding the design of the scheme and in particular its impact on the listed and conservation area status of the circus. However, the use of planters is not considered sustainable in the medium to long term given issue of their frequent illegal movement and the costs of maintaining them. Retaining the scheme would therefore entail keeping the traffic restrictions in place but working to develop a permanent solution for the area which addresses heritage concerns.



Planters on Arnold Circus

Part 2: Data considered in developing the options

This part of the consultation sets out the data which will allow residents and stakeholders to consider the options. It includes:

- Data gathered directly by the council
- Data provided by stakeholders

The sections are as follows:

Part 2a: Impact on disabled residents

This covers the impact on disabled residents.

Part 2b: Access for emergency service vehicles, streetworks and council services

This covers access for various groups including the emergency services and council services.

Part 2c: Congestion on boundary roads

This covers data on congestion on boundary roads and bus services.

Part 2d: Displaced traffic on local roads

This covers data on displaced traffic in the local area and on local residential streets.

Part 2e: Air quality

This provides an overview of the air quality data in the area before and after the Liveable Streets closures.

Part 2a: Impact on disabled residents

The implementation of the Liveable Streets programme in Bethnal Green resulted in fundamental changes to the road networks ability to serve the local community. This was primarily due to the closure of a series of B roads which served to enable access between the main boundary roads and smaller residential streets.

Under section 122 (part a) of the Road Traffic Regulation Act 1984 (RTA), it is the duty of every highways authority to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians). For part a) of section 122, this includes the desirability of securing and maintaining reasonable access to premises.

Whereas and Bethnal Green West are two densely populated wards in Tower Hamlets, which is London's most densely populated borough. These densities place

a high level of demand for access and the road network is therefore required to meet the access needs generated at these densities.

These needs include access for the emergency services, residents reliant on car use, deliveries and council operations such as a refuse collection and highways maintenance. As B roads, Old Bethnal Green Road and Gosset Street were integral to meeting these needs before their closure.

The Bethnal Green Liveable Streets scheme was ambitious in this regard as most examples of low traffic neighbourhoods tend to restrict access from larger roads to address through traffic to smaller residential streets.

Under its public sector equality duty, the council is required in the exercise of

its functions, to have due regard to the need to advance equality of opportunity between people who share a protected characteristic and those who do not.

The Act explains that having due regard for advancing equality involves removing or minimising disadvantages suffered by people due to their protected characteristics. It also involves taking steps to meet the needs of people from protected groups where these are different from the needs of other people.

Access for disabled residents

By its design, the Bethnal Green Liveable Streets scheme sought to encourage active travel by prioritising spaces for walking and cycling, while increasing journey distances for motor vehicles. This disproportionately impacts on residents who rely on the use of motor vehicles and this is recognised in the equalities

impact assessment drafted alongside this consultation process.

Impact of traffic on disabled residents

The removal of the traffic measures and reintroduction of through-traffic may impact disabled people in several ways. It is recognised that disabled people are more at risk from road danger, noise, and air pollution. For people with mobility impairments, the reintroduction of vehicle traffic may reduce their confidence in walking, cycling, using a mobility scooter or accessing public transport. Furthermore, evidence suggests regular exercise to be highly beneficial to those with impairments.

Part 2b: Access for emergency and council services

Access for emergency service vehicles

Since the implementation of the Liveable Streets scheme, there have been multiple incidents across the area where closures have hindered ambulance service and fire brigade access¹. Certain adaptations have been made where removable bollards have been installed replacing permanent closures. However, these are only accessible by the London Fire Brigade using a special key. Access issues remain for ambulances.



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Ambulance on Old Bethnal Green Road

The three emergency services were consulted on the measures. The ambulance service and London Fire Brigade support the removal of physical closures.

"I wanted to inform you of an incident that has been reported to the LAS from a concerned relative of a patient, where the ambulance response car was delayed

reaching the scene of an incident due to the hard physical closure present on Old Bethnal Green Road between Clarkson Street and Temple Street, E2.

The incident occurred on Sunday 13th February 2022 at approximately 19:50.

We had raised the incident on our incident reporting system Datix.

Could I request that the incident is logged by the council against the scheme as part of the ongoing review of LTNs in the area."

Emergency Planning and Resilience Officer
–London Ambulance Service

"We attended a 'smoke issuing' call today at Sandford House, Arnold Circus. The appliances attending entered via Club Row and had difficulty siting the appliances correctly due to the LTN zone and plant pots in place. Luckily, this turned out to be a false alarm but if the incident escalated and an aerial appliance was required it would have proved very difficult, if not impossible, to site it and use it effectively, essentially some residents would not be able to be rescued via the aerial if they are unfortunate enough to be cut off by the LTN."

Station Commander–London Fire Brigade

In their response the police safer neighbourhood team raised concerns on proposals to remove the Liveable Streets closures. This was on the grounds of anti-social behaviours benefits of the scheme particularly in the west of scheme area.

"I consider the road management measures that were brought in to have had a positive effect. Of particular concern are the proposed amendments to the roads

further west. Prior to the changes there was an enormous level of car-enabled ASB, This was due to the spill-out from the Shoreditch night time economy"
– Safer Neighbourhood Team

Access for operational council service vehicles

The network management, highways maintenance and refuse collection services were consulted for the first stage consultation in the summer of 2022. They each raised concerns regarding the Bethnal Green Liveable streets closures.

Network Management: The council has a duty to coordinate street works while ensuring network resilience is maintained and that there is efficient and expeditious movement of traffic, as far as possible.

The implementation of the Liveable Streets scheme has presented challenges to effective street works coordination due to the reduction in possible alternative routes. This is particularly critical at the eastern area of the scheme around Old Bethnal Green Road. Residents and businesses in this section can only be accessed through Mansford Street and Temple Street. This presents challenges for re-routing options for planned works and is more concerning when emergency works are involved.

Highways maintenance: There are constant demands placed on the council to temporarily close roads whether it be for its own maintenance operations or for other parties, such as utilities. These closures always require traffic management arrangements to be made in a way that minimises disruption.

This has proven to be more challenging following the implementation of the Liveable Streets scheme. Consultation with the council's highways team has shown that more routine maintenance tasks require temporary road closures due to the reduction in road space and increase in one-way roads. This not only increases disruption but means greater maintenance costs for the council.

Refuse collection services: The council's refuse collection service was also consulted on the scheme. In their response, they supported the removal of the closures as it would improve their ability to undertake their operations. Key concerns are the increased route distances and the requirement to often reverse vehicles at long distances which creates safety issues.

"Where physical barriers are in place, we ask that these be removed as it has affected how we access properties to make collections. The service's general view is that if Liveable Streets are to be achieved successfully, physical barriers are to be avoided."

Senior refuse collection services officer

1: Full incident log available in the documents section of the Bethnal Green Liveable Streets web page

Part 2c: Congestion on boundary roads

This section will analyse three datasets to understand if congestion has increased on the two main boundary roads of the Bethnal Green Liveable Streets scheme.

The data shows congestion on Hackney Road, particularly east of Warner Place, has increased significantly since the introduction of the Liveable Streets scheme. The data also shows that between 2019 and 2022 there has been no significant increase in congestion on Bethnal Green Road.

This increase in congestion on Hackney Road is attributed to diverted traffic from both sides of Hackney Road where liveable traffic neighbourhoods have been implemented.

The three sets of data used are:

- DfT travel time delay data
- iBus delay data
- TRL Astrid database data

Travel time delay data

Department of Transport data¹ has been gathered on the delay times on the main boundary roads of the scheme. The data shows a 60% increase in delays on Hackney Road from 2019 to 2021 and 13% increase in delays on Bethnal Green Road. These are significantly higher than delay increases on Whitechapel Road and Commercial Road, which are the two other east west A roads in the borough (see table below).

Impact on bus services
In 2018/19, the two bus routes serving Hackney Road provided over twelve million passenger journeys. One of the council's key strategic transport objectives is to encourage public transport use and one of the most important factors influencing bus use is service reliability. Congestion can significantly impact bus reliability and can therefore adversely impact bus use.

Data provided by the TfL network team shows an increase in bus journey times on Hackney Road and Bethnal Green Road between 2019 and 2022. The latest data for 2022 shows Bethnal Green Road bus journey times did increase in 2021 but they are now down to pre-closure levels. For Hackney Road east of Warner Place,

the increase in congestion and bus journey times remains in 2022 and this is throughout the day.

More detailed iBus data is available in the documents section of the Bethnal Green Liveable Streets web page.

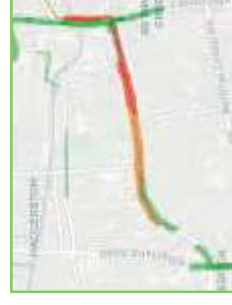
Road Name(s)	Average delay (second per vehicle per mile)			Change on 2019
	2019	2020	2021	
Hackney Road	136.0	207.1	218.7	60.81%
Bethnal Green Road	164.0	156.5	186.1	13.48%
Whitechapel Road/ Bow Road	155.0	137.8	169.7	9.48%
Commercial Road	158.0	179.0	167.6	6.08%
Cambridge Heath Road	172.9	165.4	171.1	-1.04%
Commercial Street	275.7	219.9	215.6	-21.80%
Highway/ Limehouse Link	120.7	74.8	75.3	-37.61%



2022 compared with 2019/20
- AM Peak (0700-1000)



2022 compared with 2019/20
- Inter Peak (1000-1600)



2022 compared with 2019/20
- PM Peak (1600-1900)



1: <https://www.gov.uk/government/statistical-data-sets/average-speed-delay-and-reliability-of-travel-times-cgn>

Part 2c: Congestion on boundary roads

TRL Astrid data for boundary roads

This data is not derived from traffic counts but from detectors on traffic signals which calculate an approximate number of vehicles based on how long the detector is occupied. They can be at risk of inaccuracies during busy times when static vehicles but provide a useful comparison of data from before and after the implementation of the Liveable Streets scheme.

The three locations the council has obtained data for are:

- Hackney Road/Queensbridge Road
- Hackney Road/Cambridge Heath Road
- Bethnal Green Road and Vallance Road

The data shown on this page is for the PM peak (4pm-7pm) at all three locations.

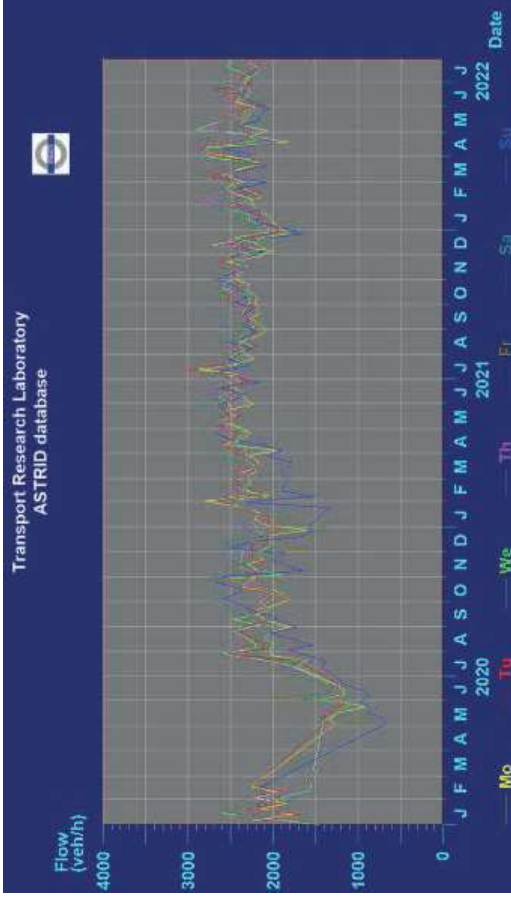
It shows the following trends:

Hackney Road/Cambridge Heath Road: Data shows a significant increase in traffic flows with all flows below 5000 in early 2020 compared to nearly all flows close to or exceeding 6000.

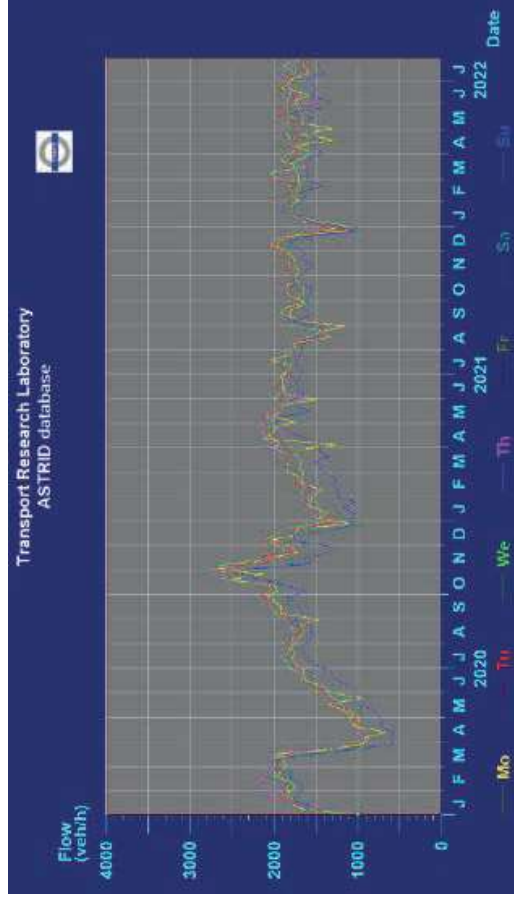
Hackney Road/Queensbridge Road: February 2020 flows were concentrated around 2000 in February. These flows were more concentrated around the 2500 level in February 2022.

Bethnal Green Road/Vallance Road: Traffic levels have largely remained the same with some negligible reduction.

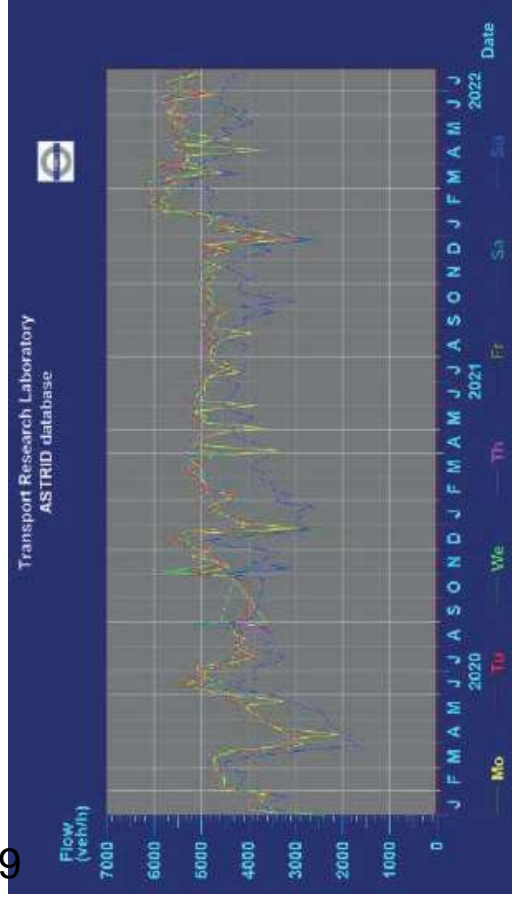
The full set of data for all three junctions is available in the documents section of the Bethnal Green Liveable Streets web page.



Hackney Road/Queensbridge Road: Total vehicle flows 4pm-7pm



Bethnal Green Road/Vallance Road : Total vehicle flows 4pm-7pm



Hackney Road/Cambridge Heath Road: Total vehicle flows 4pm-7pm

Part 2d: Displaced traffic on local streets

Traffic flows on local streets

Traffic count data¹ from 2019 and 2022 shows reductions and increases in traffic flows at various locations across Bethnal Green.

Traffic has reduced significantly on Old Bethnal Green Road which saw an 86% reduction in eastbound flows and 70% reduction in westbound flows. The western end of Columbia Road also saw a significant reduction in traffic of 53% in the eastbound and 59% in the westbound. There were also reductions on other streets including Squirries Street, Temple Street and Ravenscroft Street.

There were however streets which saw increases in traffic. The most significant rises from this list are Swanfield Street and Virginia Road which saw northbound traffic flows increase 209% and 55% respectively. Smaller densely populated residential roads such as Horatio Street and Ropley Street have seen increases in traffic of 70% and 89% in the northbound direction. These are directly attributable to the closures of the junction of Gosset Street and Columbia Road.

		Traffic flow changes between 2019 and 2022		
	Direction	Change in traffic	Direction	Change in traffic
Ravenscroft Road	NB	-9%	SB	-48%
Horatio Street	NB	70%	SB	278%
Ropley Street	NB	89%	SB	-11%
Temple Street	NB	-28%	SB	-76%
B118 Old Bethnal Green Road	EB	-86%	WB	-70%
B108 Warner Place	NB	12%	SB	-9%
B108 Squirries Street	NB	-16%	SB	-24%
Columbia Road	EB	18%	SB	-43%
B118 Columbia Road	EB	-53%	WB	-59%
Virginia Road	EB	55%	WB	20%
Swanfield Street (North)	NB	209%	SB	80%

¹: Traffic count data is available in the documents section of the Bethnal Green Liveable Streets web page

Part 2e: Air quality

Air pollution is associated with several adverse health impacts; it is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. The UK Clean Air Strategy released in 2019, provides the overarching strategic framework for air quality management in the UK and contains national air quality standards and objectives established by the government to protect human health. The strategy objectives take into account EU directives that set limit values which member states are legally required to achieve by their target dates. UK legal limits for nitrogen dioxide (NO₂) are 40 µg/m³ (micrograms per cubic metre) annual mean.

NO₂ data from within the scheme and boundary roads was collected and compared with similar roads and streets in other parts of the borough. The data showed significant reductions between 2019 and 2022 across the borough, including the roads on the boundary and within Bethnal Green.

Improved air quality on boundary roads

Average NO₂ levels reduced by 20.13% on Bethnal Green Road and 23.29% on Hackney Road compared to 20.93% for the comparable A roads in the Borough.

For Hackney Road average NO₂ levels have reduced at a higher rate than the other A roads in the borough. For Bethnal Green Road they reduced at a lower rate than the other A roads in the borough. These differences are negligible and it

shows the increase in the congestion on Hackney Road and reduction in traffic on Bethnal Green Road not having a significant bearing on NO₂ levels.

Improved air quality on local roads

Average NO₂ levels reduced by 28.01% from the three NO₂ monitoring sites in the scheme area. This is higher than comparable locations in other parts of the borough which have not had road closures.

Comparing the two sets of data, there is an indication that most of the reductions in NO₂ emissions are due to ULEZ and cleaner vehicles as significant reductions have also occurred elsewhere in the borough. But the difference between the two can be attributed to the traffic reduction observed around each of the monitoring sites. It is however important to note that the monitoring stations in the scheme area are located where there have been significant reductions in traffic. There are no NO₂ monitoring stations on Swanfield Road, Virginia Road or Horatio Street where there have been significant increases in traffic.

Conclusions

The data is therefore inconclusive as to whether the introduction of the closures in the Bethnal Green area have had a significant impact on air quality levels. The data suggests ULEZ and cleaner vehicles have been far more effective in reducing emissions than the closures and in some areas, air quality has improved despite increases in congestion and traffic. Council action on air quality will need to focus on addressing congestion particularly on

high trafficked roads, encouraging less car use through encouraging the take up of alternative modes and the adoption of cleaner vehicle technology.

These reductions in NO₂ across the borough should address concerns around the impact on air quality resulting from the removal of closures. The increase in traffic levels in areas such as Bethnal Green Road and Gosset Street are unlikely to have a significant impact on air quality. To address these concerns, the council is committed to establishing a framework for monitoring any air quality impacts from option 1.

A new air quality monitoring framework

NO₂ is not the only pollutant from traffic that is of concern, Particulate matter (PM) is everything in the air that is not a gas and therefore consists of a huge variety of chemical compounds and materials, some of which can be toxic. It will be important to measure the fractions of PM where particles are less than 10 micrometres in diameter (PM₁₀) and less than 2.5 micrometres in diameter (PM_{2.5}) based on the latest evidence on the effects of PM to health. PM is not currently monitored by the council in the area but if option 1 is implemented, we will develop a robust monitoring framework to assess the impact of option 1 on NO₂, PM_{2.5} or PM₁₀ levels. This will include new and more accurate monitoring equipment where required.

All values are in NO₂ micrograms per cubic metre (µg/m³)

Bethnal Green Road				
Location	2019	2022	Percentage Change	Absolute Change
Buckfast St/Bethnal Green Rd	32.48	23.8	-26.72%	-8.68
Paradise Row/Bethnal Green Rd	36.01	25.4	-18.36%	-10.61
Bethnal Green Rd/Brick Lane	36.55	30.98	-15.31%	-5.6
Average			-20.13%	-8.95

Hackney Road				
Location	2019	2022	Percentage Change	Absolute Change
Warner Place/Hackney Rd	35.44	26.7	-24.66%	-8.74
Queensbridge Rd/Hackney Rd	35.26	27.53	-21.92%	-7.73
Average			-20.13%	-8.95

Comparable east-west A roads elsewhere in Tower Hamlets				
Location	2019	2022	Percentage Change	Absolute Change
Whitechapel High St (KFC)	47.84	41.31	-13.65%	-6.53
Whitechapel Rd/Adler St	40.33	30.75	-23.75%	-9.58
Whitechapel Market	53.51	41.1	-23.19%	-12.41
Harford St/Mile End Rd	36.11	29.49	-18.33%	-6.62
Globe Rd/Mile End Rd	42.28	36.38	-16.32%	-5.9
Philea St/Commercial Rd	34.76	24.45	-29.66%	-10.31
Chrisp Street/E India Dock Road	38.73	32.22	-16.81%	-6.51
Average			-20.63%	-7.91

Bethnal Green scheme area local roads				
Location	2019	2022	Percentage Change	Absolute Change
Columbia Rd/Gosset Street	32.74	23.4	-28.63%	-9.34
Calvert Ave/Boundary Street	34.66	25.9	-25.27%	-8.76
Squirrels St/Gosset St	37.55	26.2	-30.23%	-11.35
Average			-28.01%	-9.82

Comparable east-west A roads elsewhere in Tower Hamlets				
Location	2019	2022	Percentage Change	Absolute Change
St Stephen's Rd/Treedegar Rd	38.66	30.73	-20.51%	-7.93
Brick Lane/Princes St	32.17	25.5	-20.73%	-6.67
Roman Rd/Globe Road	34.13	28.52	-16.44%	-5.61
Average			-18.23%	-6.74

Part 3: Guide to responding to this consultation

A paper survey has been sent with this document as part of this consultation. Your views are important to us and we want everyone to have their say.

Using your response reference number

All paper surveys sent out to residents within the consultation boundary will have a response reference code, for each address to be used for online responses if that is your chosen method of response. This code is for the household and can be used for responses from each member of the household.

Page 2 of 12

Please provide your feedback by

11.59pm on Sunday 12th February 2023.

Visit our website talk.towerhamlets.gov.uk/LSBethnalGreen for more information on the plans

Have your say by contributing by:

1

Paper survey (sent with this leaflet) sent via post in the freepost envelope provided.

2

Online via talk.towerhamlets.gov.uk/LSBethnalGreen.

The online survey is open for all to respond to. Residents and businesses who have received a paper copy of the survey should use the response reference code on the survey.

Appendix : How you responded to the Weavers first stage consultation

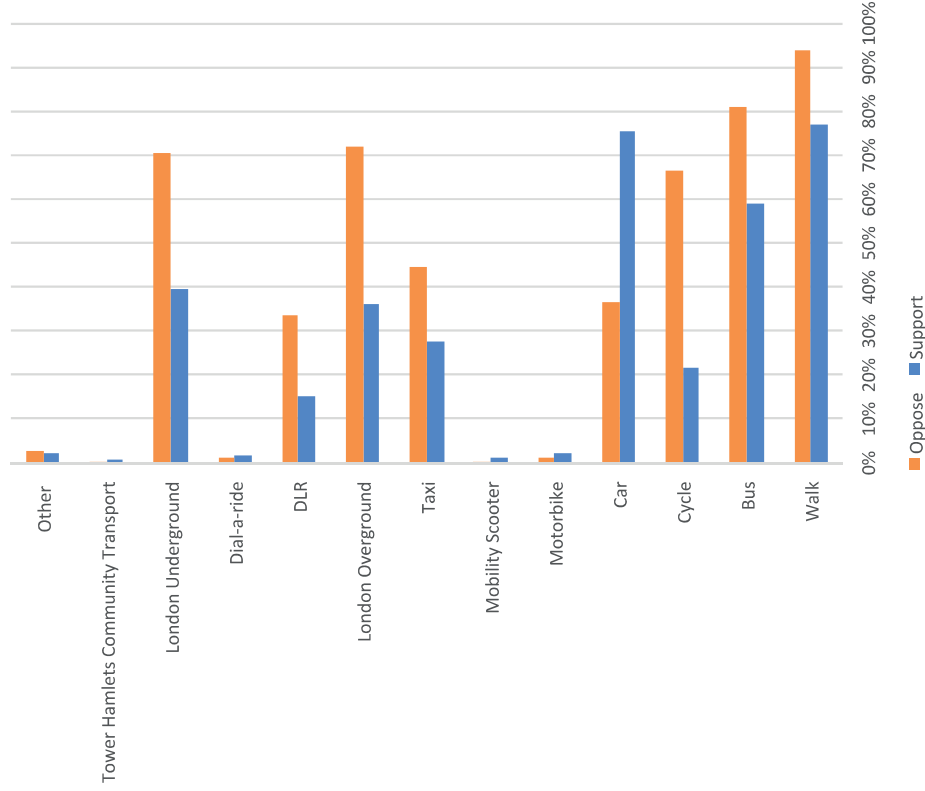
First round public consultation results

The public consultation was conducted between Wednesday 6th July and Sunday 7th August 2022. Consultation packs were delivered to 4,615 residential and business addresses within the consultation area shown below.

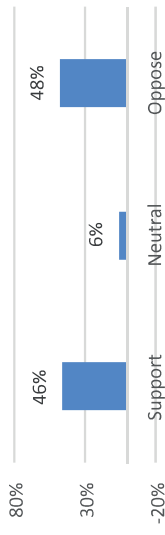
A total of 2,809 responses were received and 44% (1,238) of these were from within the scheme area. Responses which used the resident code sent out across the scheme area totaled 994 or 35% of all responses.

A total of 1,571 responses were received from outside the scheme area. These include other parts of Tower Hamlets with high concentrations in Bow and the Isle of Dogs. Responses were also received from other London borough with high levels of responses from Hackney, Waltham Forest, Islington and Lambeth.

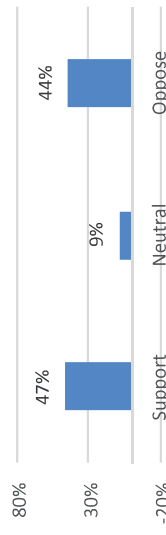
Travel mode uses from all responses and responses from within scheme area



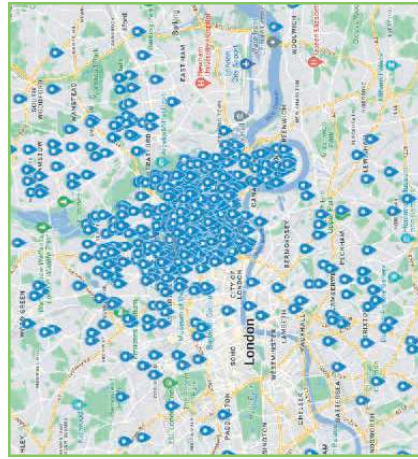
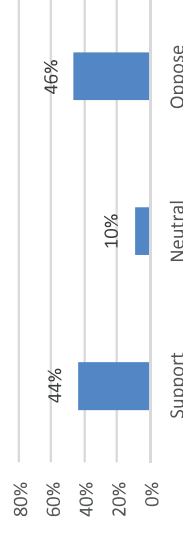
Question 1: How supportive are you of the proposed removal of the closure on the junction of Columbia Road and Gosset Street to facilitate one-way southbound access?



Question 2: How supportive are you of the proposed removal of the closures around Jesus Green which are located on Quilter Street, Barnet Grove and Wellington Row?



Question 3: How supportive are you of the proposed removal of the Liveable Streets closures around Arnold Circus?



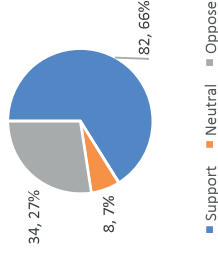
Distribution of responses

Appendix : How you responded to the Weavers first stage consultation

Demographic information

The responses to the questions were almost always consistent with each other. Those who were in support of the proposals in one location were almost always also in support of the proposals in other locations. Analysis of the demographic information from the responses received for Question 1 as an indicator of broad support or opposition for the wider set of proposals to remove the closures.

Responses from people with disabilities



Age

The age profiles differed in terms of responses from those from younger and older respondents. For those opposed to the removal of closures 37% were over 45 and 7% over 65. This compares to those in support of closure removal where 57% were over 45 and 17% over 65.

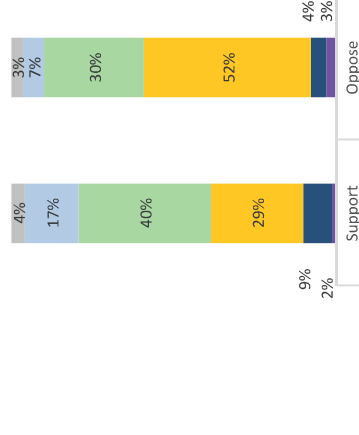
Ethnicity

The ethnicity profiles differed in terms of responses from a white background and those from a Bangladeshi background. Those from a white background represented 65% of responses opposed to the removal of the closures compared to 31% in support. Those from a Bangladeshi background represented 3% of responses opposed to the removal of the closures compared to 47% in support.

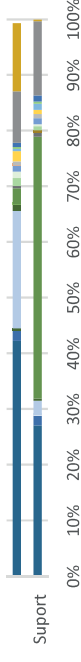
Disability

From the 984 respondents, 168 responses stated that their day-to-day activities were limited due to a health problem or disability. Analysis of these responses shows most respondents with disabilities showed support to the proposals to remove the Liveable Streets closures (66%).

Age distribution of responses



Ethnicity distribution of responses



Appendix: Consultation feedback from Weavers first stage consultation

Consultation feedback

For the first stage of the consultation, we received over 4,000 responses both in support of and opposed to the proposals to remove the Liveable Streets closures.

We also engaged with key stakeholders including the emergency services, local businesses, TfL and local schools. Below are a series of key themes from the responses received from stage one of the consultation.

Key themes from those opposed to the removal of closures set out in stage 1 of the consultation:

- Traffic impact : The main theme around the opposition to the proposals relates to concerns around increasing traffic levels. Many feel that by reducing traffic levels, the area became safer, cleaner and more pleasant to live in due to the reduction in the adverse impacts of high traffic levels. These are repeated frequently through the responses but are predominantly:

- Air pollution
- Noise
- Safety

- Antisocial Behaviour (ASB) : Respondents opposing the proposals also state that ASB has reduced since the road closures were installed and this is particularly the case around Arnold Circus where there are concerns the ASB issues relating to nighttime activity will return if Arnold Circus is reopened to traffic.
- Cost of proposals : There is another key

theme around concerns on the costs of the project. It is felt that a significant amount of money has been spent on the closures and the money to reverse them could be better spent elsewhere.

- Behaviour change : Responses opposing the proposals also frequently refer to the behaviour change benefits of the Liveable Streets closures.

Key themes from those in support of the removal of closures set out in stage 1 of the consultation:

- Increased congestion and pollution: The predominant key theme from respondents supporting the removal of closures related to the increased congestion in the wider area.
- Feel unsafe at night: There are a few responses which refer to the in impact of safety perception in the area due to the reduced natural surveillance available when there is general traffic flow.

- Increased journey times for those dependent on the use of a car: Respondents who felt they were reliant on the use of a car support removal of the closure on the grounds of reducing their journey times and reliance on the use of congested boundary roads, particularly Hackney Road. These included parents, those providing care and residents whose occupations required the use of a car such as private hire and delivery drivers.
- Access to services/mobility: Another key theme is concerns around loss of access to essential services for those who access

them by car. This can be either through their own car or through a care giver or taxi. This is predominantly access to health services include GP and hospital appointments.

- Impact on emergency vehicle access and response times: Respondents supporting the proposals raised the issue of emergency service vehicle access
- Antisocial behaviour (ASB): Respondents supporting the proposals raised concerns about the increase in ASB since the road closures were installed. This refers to the increase in drug dealing and other criminal behaviour.

Notes


Notes

Notes

Appendix G Bethnal Green Equality Impact Analysis

Section 1: Introduction

Name of proposal
For the purpose of this document, 'proposal' refers to a policy, function, strategy or project
Liveable Streets Changes
Service area and Directorate responsible
Highways and Transport, Place Directorate
Name of completing officer
Mohammed Chibou, Highways and Transport
Approved by (Corporate Director / Divisional Director/ Head of Service)
Date of approval
Click or tap to enter a date.

Conclusion	Current decision rating (see Appendix A)
<p>As a result of performing the EIA, it is evident that for each option there is a risk that disproportionately negatively impacts (as described below) exist to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, this risk may be removed or reduced by implementing the actions detailed within the <i>Impact analysis and action plan</i> section of this document.</p>	<p>Amber</p> <div style="text-align: center; margin-top: 10px;">  </div>

The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between those with 'protected characteristics' and those without them
- Foster good relations between those with 'protected characteristics' and those without them

This Equality Impact Analysis provides evidence for meeting the Council's commitment to equality and the responsibilities outlined above. For more information about the Council's commitment to equality, please visit the Council's [website](#).

Section 2: General information about the proposal

Describe the proposal including the relevance of proposal to the general equality duties and protected characteristics under the Equality Act 2010
Motor vehicle access restrictions and placemaking measures were implemented in the Bethnal Green and Weavers areas as part of the Liveable Streets programme. This programme had the key objectives of improving the look and feel of public spaces;

improving the environment to encourage more walking and cycling; and attempting to reduce through traffic on residential streets. In January 2023, the council ran a public consultation on two options. Option 1 developed by the council to remove most of the Liveable Streets scheme to address a significant number of objections and concerns, raised by residents, businesses, and the emergency services – such as longer journey times, increased emissions/costs, and hindrances to emergency vehicle responses. *Option 2 was to retain the traffic restrictions across the area. Following the public consultation an Option 3 has been developed which seeks to address concerns raised by key internal and external stakeholders and the public consultation.*

Summary of each option:

Option 1: This is the scheme that was referred to as Option 1 in the public consultation.

Old Bethnal Green Road

- Removal of closure on Punderson's Gardens.
- Removal of closure on Teesdale Street.
- Removal of closure on Old Bethnal Green Road.
- Removal of closure on Clarkson Street.
- Removal of closure on Canrobert Street.
- Removal of closures on Pollard Street and Pollard Row.
- Making Old Bethnal Green Rd two way between Pollard Row & Clarkson Street.

Columbia Road Area

- The removal of the closure on the junction of Columbia Road and Gosset Street and Gosset Street and allowing southbound traffic only (amended to allow northbound emergency vehicle access).
- The removal of closures on Quilter Street and the junction of Wellington Row and Barnet Grove.
- Wellington Row would be one way westbound from the junction of Delta Street to the junction with Gosset Street.
- Wellington Row would be one way eastbound from the junction of Delta Street to the junction with Durant Street.
- Barnet Grove one way southbound between the junction of Elwin Street to the junction with Barnet Grove.
- Making one-way sections on Ravenscroft Street (between Ezra Street and Columbia Road) two way
- Making one-way section on Columbia Road (between Chambord Street and Ravenscroft Street) two-way.

Arnold Circus Area

- Removal of closures at each arm of Arnold Circus.
- Removal of Closure on the junction between Old Nichol Street.

A series of areawide improvements to the public realm to encourage active travel

- Option 1 includes plans to create a network of accessible walking routes across Bethnal Green. Creating this network would make it easier for residents to access important services including doctors' surgeries, shops and public transport.
- The council has identified a first phase of pedestrian improvements under consideration. Pedestrian improvements across the area will include:
 - a) New zebra crossings on Columbia Road, Gosset Street, Ravenscroft Street and Old Bethnal Green Road.

- b) New continuous crossings across the area including where existing physical closures are removed.
- c) Speed calming raised junctions at various locations across the area.

Option 2: Full retention of current scheme with all existing closures introduced by the scheme kept in place.

Option 3: This is an amended version of Option 1 which seeks to address concerns raised by key internal and external stakeholders and the public consultation. The differences are as follows:

Old Bethnal Green Area

- Keep closure on Canrobert Street
- Keep Old Bethnal Green Road one way between Pollard Row and Clarkson Street
- New camera filters on Old Bethnal Green Road junction with Temple Street to operate during peak times (with resident exemption)
- Widen footway on Old Bethnal Green Road between Mansford Street and Pollard Row
- New school street on Pollard Street

Columbia Road Area

- Keep one-way section on Ravenscroft Street (between Ezra Street and Columbia Road)
- New camera filter on Hackney Road junction with Ropley Street to operating Monday to Saturday. Only restricts non-exempt vehicles from turning in from Hackney Road into Ropley Street.

Arnold Circus Area

Four new camera filters on Old Nichol Street and Arnold Circus junction with Calvert Avenue, Navarre Street and Hocker Street restricting night-time non-resident through traffic and associated ASB.

Section 3: Evidence (consideration of data and information)

What evidence do we have which may help us think about the impacts or likely impacts on residents, service users and wider community?

Data was obtained from the following sources:

- 2021 census
- Transport for London's London Travel Data Survey (LTDS)
- Department for Transport's STATS19
- Tower Hamlets Nitrogen Dioxide Diffusion Tube Results.
- Air Quality Action Plan 2022-27
- London Borough of Tower Hamlets LIP3 2018
- 2019.2021 and 2022 traffic counts undertaken by the council
- DfT travel time delay data
- iBus delay data
- TRL Astrid database data (2018-2022)
- Air Quality News - Low-level pushchairs expose babies to 50% more air pollution
- Low-level pushchairs expose babies to 50% more air pollution, study suggests - AirQualityNews
- https://www.london.gov.uk/sites/default/files/who_cares_-_helping_londons_unpaid_carers_by_dr_onkar_sahota_am.pdf

- <https://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>
- Travel in London: Understanding our diverse communities 2019 (tfl.gov.uk)
- <https://democracy.islington.gov.uk/documents/s26001/Appendix%20%20-%20Steer%20Journey%20time%20analysis%20for%20PFS.pdf>
- <https://roadtraffic.dft.gov.uk/local-authorities/93>

General Evidence

2021 Census data was obtained by using the area codes in the scheme area. For the majority, data has been extracted at Output Area level. For some datasets, data is only available at Super Output Area level. For data on gender identity this is only available at Local Authority level. Data has been extracted to the lowest level to achieve greater granularity.

General Evidence

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Traffic Data

The latest junction data collated within the TRL ASTRID database shows the following changes in traffic volumes between December 2019 (before scheme implementation) and 2022 (post scheme implementation):

- Hackney Road / Cambridge Heath Road: Data shows a significant increase in traffic flows with all flows below 5000 in early 2020 compared to nearly all flows close to or exceeding 6000
- Hackney Road / Queensbridge Road: February 2020 flows were concentrated around 2000 in February. These flows were more concentrated around the 2500 level in February 2022
- Bethnal Green Road/Vallance Road: Traffic levels have largely remained the same with some negligible reduction.

Internal roads indicated a combination of increases and decreases in total traffic volumes and mean speeds, with insights below:

- Old Bethnal Green Road: 6% reduction in mean speeds, 67% decrease in total traffic volumes
- Columbia Road: 16% reduction in mean speeds, 48% decrease in total traffic volumes
- Temple Street: 9% reduction in mean speeds, 50% decrease in total traffic volumes
- Virginia Road: 5% reduction in mean speeds, 45% decrease in total traffic volumes
- Swanfield Street (North): 7% reduction in mean speeds, 118% increase in total traffic volumes
- Warner Place: 1% increase in mean speeds, 7% increase in total traffic volumes

Information has additionally been provided from Transport for London regarding the impact no bus journey times on Hackney Road and Bethnal Green Road. Between May 2019 – May 2021 the following impacts were determined:

- Bethnal Green Road: 1-2 minutes slower eastbound
- Hackney Road:
 - From 2-3 up to >3 minutes slower eastbound
 - From 1-2 minutes slower to 2-3 minutes quicker westbound

Air Quality Data (NO2)

NO2 data from within the scheme and boundary roads was collected and compared with similar roads and streets in other parts of the borough. The data showed significant reductions between 2019 and 2022 across the borough, including the roads on the boundary and within Bethnal Green.

Car Ownership data

Car ownership data from the 2021 census for the scheme area shows just under 70% of households have no access to a car. There is a slightly higher proportion of vehicle ownership across the whole borough. Households in Tower Hamlets have the third lowest proportion of car ownership in London behind the boroughs of Camden and Islington.

TS045 - Car or van availability	Scheme Area		Tower Hamlets	London
No cars or vans in household	4463	67.8%	66.4%	42.1%
1 car or van in household	1801	27.4%	28.7%	40.3%
2 cars or vans in household	262	4.0%	4.2%	13.6%
3 or more cars or vans in household	53	0.8%	0.7%	4.0%

¹Source: 2021 Census

Age (all age groups)

Census 2021 data indicates that there are fewer younger people living in the scheme area than in the borough as a whole. 16.3% of people in the scheme area are aged 0-14 compared to 17.5% across the borough. 10% of residents in the scheme area are aged 60 and over; this is a higher proportion than the borough average of 8.4%. In 2021, the numbers of children, working age adults and older people in Tower Hamlets have all increased since 2011. The largest proportionate rise is in the working age population (25% increase).

TS007A - Age by five-year age bands	Scheme Area		Tower Hamlets	London
Aged 4 years and under	918	5.5%	6.2%	6.0%
Aged 5 to 9 years	854	5.1%	5.7%	6.0%
Aged 10 to 14 years	968	5.8%	5.6%	6.1%
Aged 15 to 19 years	908	5.4%	5.9%	5.6%
Aged 20 to 24 years	1667	9.9%	10.3%	6.7%
Aged 25 to 29 years	2353	14.0%	14.3%	8.9%
Aged 30 to 34 years	2158	12.9%	13.1%	9.2%
Aged 35 to 39 years	1569	9.4%	9.6%	8.4%
Aged 40 to 44 years	1188	7.1%	7.3%	7.6%
Aged 45 to 49 years	1006	6.0%	5.6%	6.7%
Aged 50 to 54 years	828	4.9%	4.5%	6.5%
Aged 55 to 59 years	683	4.1%	3.5%	5.8%
Aged 60 to 64 years	534	3.2%	2.7%	4.6%
Aged 65 to 69 years	331	2.0%	2.0%	3.5%
Aged 70 to 74 years	277	1.7%	1.4%	3.1%
Aged 75 to 79 years	216	1.3%	0.9%	2.2%
Aged 80 to 84 years	171	1.0%	0.7%	1.6%
Aged 85 years and over	149	0.9%	0.7%	1.6%

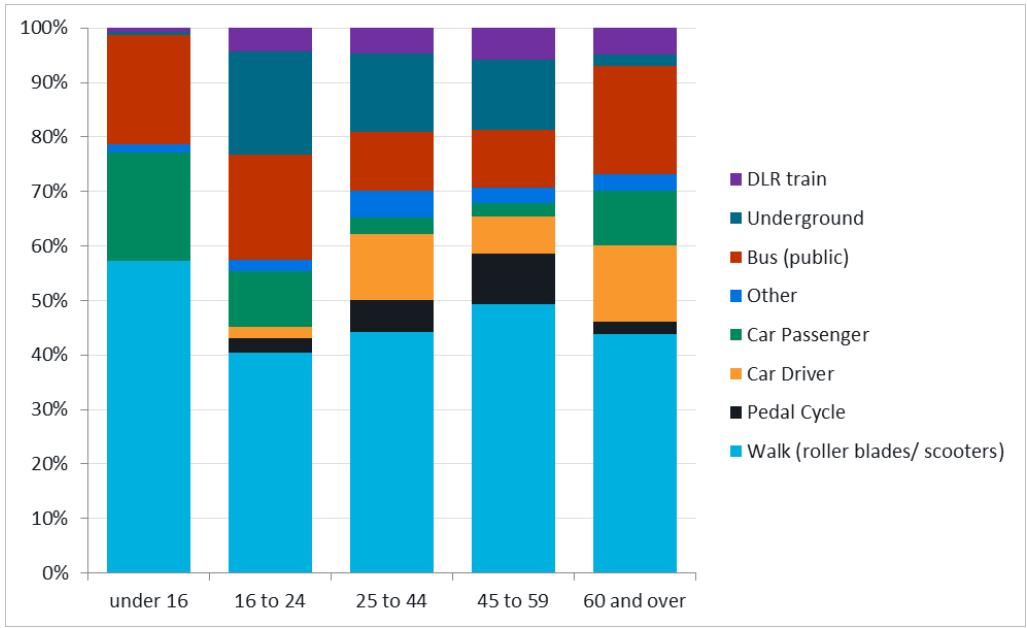
2Source: 2021 Census

Travel Mode Share

Figure 10 shows the mode share of trips made for all purposes by residents in Tower Hamlets by age group, drawn from the LTDS dataset. Those aged 60+ have higher car use than younger age groups with those aged 16 to 24 having the highest rates of Underground use. Mode share for walking is high across all age groups (over 40%) but is particularly high for those aged under 16 (57%). Cycling is most prevalent among those aged 25-44 (6%) and 45-59 (9%).

The travel mode of children has changed considerably over the last twenty years, with fewer children travelling as pedestrians or cyclists. To a large extent, parents determine the mode choice of children. Traffic infrastructure has a significant impact on parental decision-making concerning children's travel mode choice, by affecting both the real and the perceived traffic safety. Real traffic safety can be quantified in terms of numbers of collisions on the street, whilst perceived traffic safety is dependent upon the characteristics of their children and how safe they feel they will be travelling on the highway unsupervised.

Figure 10: Tower Hamlets LTDS Results



Source: LTDS, 2018/19 and 2019/20

Road Safety Data

The age at which residents are most likely to be injured as pedestrians in Tower Hamlets is 10-15 years and 80-84 years as measured in five-year age bands based on 2017 population against the number of average annual casualties per 1000 population (London Borough of Tower Hamlets LIP3).

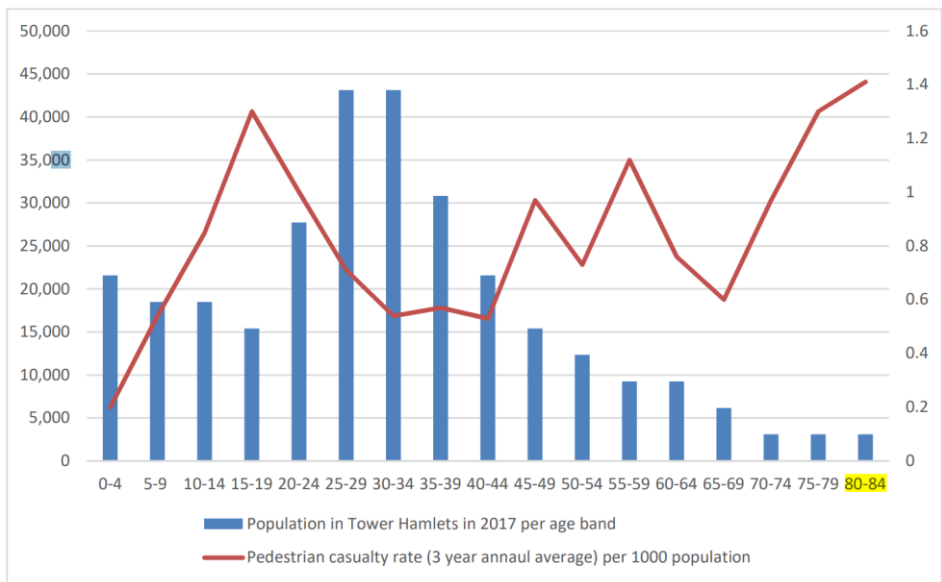


Figure 11: Pedestrian casualty rate (3-year average for 2015, 2016 and 2017) per 1000 population against the number of Tower Hamlets population in five-year age bands (as of 2017).

Childhood Obesity

Data available at ward level only. In Bethnal Green West and Bethnal Green West wards, childhood obesity levels for 4-5-year-olds and 10-11 year olds are notably higher than national levels:

- 13% and 10.6% respectively in 4–5-year-olds compared to the England average of 9.7%
- 25.9% and 22.2% respectively in 10–11-year-olds compared to the England average of 20.4%¹

It is important to encourage physical activity and exercise from a young age because inactive children are likely to become inactive adults, with evidence to show regular physical activity is linked to positive health outcomes². Walking or cycling to school can be a way of incorporating physical activity into daily routines.

(Physical, learning difficulties, mental health and medical conditions)

There are over 7,000 blue badge holders within the borough. The ratio of retired blue badge holders to all blue badge holders in Tower Hamlets is 2.7:1, and 4.7% of the retired population holds a blue badge. There are 1,634 taxicard members within the borough.

General Health (Census 2021)

TS037 - General health	Very good health	Good health	Fair health	Bad health	Very bad health
Scheme Area	8,663	5,351	1,800	721	253
	51.6%	31.9%	10.7%	4.3%	1.5%
London	53.6%	31.8%	10.3%	3.2%	1.0%
Tower Hamlets	53.0%	32.1%	10.0%	3.6%	1.3%

Source: 2021 Census

The proportion of residents living in the scheme area with bad/very bad health is slightly higher than the borough and London average.

Limitation of day-to-day activities

TS038 - Disability	Disabled under the Equality Act: Day-to-day activities limited a lot	Disabled under the Equality Act: Day-to-day activities limited a little	Not disabled under the Equality Act: Has long term physical or mental health condition but day-to-day activities are not limited	Not disabled under the Equality Act: No long term physical or mental health conditions
Scheme Area	1102	1339	866	13466
	6.6%	8.0%	5.2%	80.3%

¹ Public Health England – National Child Measurement Programme, 2017/18 to 2019/20

² <https://www.gosh.nhs.uk/conditions-and-treatments/general-health-advice/leading-active-lifestyle/exercise-children-and-young-people/> accessed August 2022

Tower Hamlets	5.7%	7.3%	4.5%	82.5%
London	5.7%	7.5%	5.2%	81.5%

Source: 2021 Census

There is a slightly higher proportion of people in the scheme area whose day-to-day activities are limited than in the wider borough.

Sex

TS008 - Sex	Female	Male
Scheme Area	8,520	8,258
	50.8%	49.2%
Tower Hamlets	49.8%	50.2%
London	51.5%	48.5%

Source: 2021 Census

There are slightly more females than males in the scheme area which is in contrast to the split in Tower Hamlets. In London, data published by TfL shows women are less likely to drive (35% compared to 45% of men drive once a week) and are less likely to cycle or travel by train, Tube or motorbike. They are also more likely to travel with buggies, which can impact their travel choices.

TfL data also shows cyclists are more likely to be male. The study also found that 87% of women never use cycling as a mode of transport around London (*'Understanding the travel needs of London's diverse communities: Women, April 2012'*). According to the Tower Hamlets Annual Residents Survey (2019), women are less likely to cycle in London due to road safety concerns. Research carried out by TfL in 2014 identified that women make a greater number of journeys per weekday than men. Trips made by women tend to be shorter and completed using different types of transport than journeys made by men.

On average in 2018 across England, women made more journeys by taxi or PHVs compared to men (11 trips per person per year to 10 trips per person per year respectively). However, men travel further distances than women. Most taxi and PHV drivers are male (98%)³.

Gender reassignment

Census 2021 included a question about gender identity. Data for this question is provided at local authority. 0.6% of residents in Tower Hamlets said their gender identity was different from their sex registered at birth. This is broadly comparable to the London average of 0.5%. UK crime data for 2019/20 shows 'transgender identity' accounts for 1% of the hate crimes recorded by British Transport Police and 1.25% of the hate crimes recorded by the Metropolitan Police (it is recognised that that statistics may not include all incidents because not all crimes are reported).

Marriage and civil partnerships

³ Taxi and Private Hire Vehicles Statistics: England 2019

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/833569/taxi-and-phv-england-2019.pdf

The proportion of residents in the scheme area that are married is 28.5% and is lower than the borough (32.6%) and London average (39.7%).

TS002 - Legal partnership status	Scheme Area		Tower Hamlets	London
	Married or in a registered civil partnership: Married	3954	28.5%	31.6%
Married or in a registered civil partnership: In a registered civil partnership	70	0.5%	0.4%	0.3%
Separated, but still legally married or still legally in a civil partnership: Separated, but still married	275	2.0%	1.9%	2.3%
Separated, but still legally married or still legally in a civil partnership: Separated, but still in a registered civil partnership	4	0.0%	0.0%	0.0%
Divorced or civil partnership dissolved: Divorced	757	5.5%	5.0%	7.2%
Divorced or civil partnership dissolved: Formerly in a civil partnership now legally dissolved	19	0.1%	0.1%	0.0%
Widowed or surviving civil partnership partner: Widowed	454	3.3%	2.7%	4.2%
Widowed or surviving civil partnership partner: Surviving partner from civil partnership	3	0.0%	0.0%	0.0%
Never married and never registered a civil partnership	8353	60.1%	58.3%	46.2%

Source: 2021 Census

Research from 2019, demonstrates that poverty is twice as high for lone parents and children in lone-parent families, compared to couple families, although lone parents and families with children are both more at risk of transport poverty compared to average⁴.

Religion or philosophical belief

The proportion of people indicating they have no religion, and those declining to state their religion, is higher in the scheme area (31.2%) than the Tower Hamlets and London averages. The proportion of residents who are Muslim in the scheme area is 40% which is slightly higher than the borough average and the proportion of residents in the scheme area who are Christian is 19.4%, lower than the borough average.

TS030 - Religion	Scheme Area		Tower Hamlets	London
	No religion	5233	31.2%	26.6%

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/953951/Transport_and_inequality_report_document.pdf

Christian	3256	19.4%	22.3%	40.7%
Buddhist	130	0.8%	1.0%	0.9%
Hindu	80	0.5%	2.0%	5.1%
Jewish	122	0.7%	0.4%	1.7%
Muslim	6704	40.0%	39.9%	15.0%
Sikh	50	0.3%	0.3%	1.6%
Other religion	96	0.6%	0.5%	1.0%
Not answered	1109	6.6%	6.9%	7.0%

Source: 2021 Census

Race

There is a slightly higher proportion of Asian, Asian British or Asian Welsh: Bangladeshi in the scheme area than the borough average (35.6% compared to 34.6%). There is also a higher proportion of White: British in the scheme area than in the borough as a whole (27.7% compared to 22.9%).

TS021 - Ethnic group	London	Tower Hamlets	Scheme Area	
Asian, Asian British or Asian Welsh: Bangladeshi	3.7%	34.6%	5,906	35.2%
Asian, Asian British or Asian Welsh: Chinese	1.7%	3.3%	209	1.2%
Asian, Asian British or Asian Welsh: Indian	7.5%	3.3%	206	1.2%
Asian, Asian British or Asian Welsh: Pakistani	3.3%	1.1%	93	0.6%
Asian, Asian British or Asian Welsh: Other Asian	4.6%	2.2%	281	1.7%
Black, Black British, Black Welsh, Caribbean or African: African	7.9%	5.0%	785	4.7%
Black, Black British, Black Welsh, Caribbean or African: Caribbean	3.9%	1.6%	262	1.6%
Black, Black British, Black Welsh, Caribbean or African: Other Black	1.7%	0.8%	84	0.5%
Mixed or Multiple ethnic groups: White and Asian	1.4%	1.4%	250	1.5%
Mixed or Multiple ethnic groups: White and Black African	0.9%	0.7%	117	0.7%
Mixed or Multiple ethnic groups: White and Black Caribbean	1.5%	1.2%	202	1.2%
Mixed or Multiple ethnic groups: Other Mixed or Multiple ethnic groups	1.9%	1.7%	316	1.9%
White: English, Welsh, Scottish, Northern Irish or British	36.8%	22.9%	4,651	27.7%
White: Irish	1.8%	1.1%	257	1.5%
White: Gypsy or Irish Traveller	0.1%	0.0%	2	0.0%
White: Roma	0.4%	0.7%	109	0.6%
White: Other White	14.7%	14.6%	2,443	14.6%
Other ethnic group: Arab	1.6%	1.2%	146	0.9%
Other ethnic group: Any other ethnic group	4.7%	2.7%	454	2.7%

Source: Census 2021

TS021 - Ethnic group	London	Tower Hamlets	Scheme Area	
All other	23.3%	13.8%	1,389	8.3%
Black	13.5%	7.4%	1,131	6.7%
Bangladeshi	3.7%	34.6%	1,906	35.2%
Mixed	5.7%	5.0%	885	5.3%
White Other	17.0%	16.4%	2,811	16.8%
White English, Welsh, Scottish, NI or British	36.8%	22.9%	4,651	27.7%

Source: Census 2021

Ethnic minority residents are more likely to undertake journeys by walking or by public transport than white Londoners, however, they are more likely to be concerned about their personal security and safety than white Londoners, especially at night.

- Ethnic minority Londoners, both adults and children are almost twice as likely as white Londoners to be injured on the roads as a car occupant and reducing this statistic is a priority. Ethnic minority road users also have the highest risk of being a pedestrian casualty. White Londoners are at higher risk with being involved in a cycle collision than other groups of cyclists.
- Ethnic minority Londoners are also less likely than white Londoners to say that they feel safe from road accidents when walking around London, either during the day or at night.

Walking is the most commonly used type of transport by ethnic minority Londoners⁵. Use of cars among ethnic minority Londoners is lower than for white Londoners, with 32% and 43% respectively driving a car at least once a week. Car use is higher among Asian Londoners compared to other minority ethnic groups (38% of Asian Londoners drive a car at least once a week, compared to 25% of black Londoners). In contrast, higher proportions of white Londoners travel by bike, car, black cab, National Rail and motorbike than ethnic minority Londoners.

In England, there are significantly higher rates of incidence of asthma within ethnic minority groups. When subdivided, there are even higher rates of asthma incidence in people in ethnic minority groups born inside the UK than those born outside the UK; second and third generation descendants of South Asian and Afro-Caribbean migrants suffer disproportionately from asthma. Inequalities exist between ethnic groups and asthma registrations in the older age groups. 12.9% of Tower Hamlets' South Asian population over 70 years old have been diagnosed with asthma compared with 8.3% of the white and 5.2% of the black population over 70⁶.

⁵ Understanding the travel needs of London's diverse communities BAME April 2012
<http://content.tfl.gov.uk/BAME.pdf>

⁶ Travel in Tower Hamlets Transport Strategy Evidence Base & Bibliography Annex A, 2019
<https://democracy.towerhamlets.gov.uk/mgConvert2PDF.aspx?ID=160546>

Sexual orientation

According to TfL's 'Travel in London: Understanding our diverse communities' 2019 study, lesbian, gay and bisexual (LGB) people have a similar profile to the general population in terms of barriers to using public transport more frequently. For example, 48% of Londoners identify overcrowding as a barrier compared to 52% of LGB Londoners, and 41% identify cost of travel as a barrier in both groups.

Census 2021 data indicates that the proportion of residents in the scheme area that are straight or heterosexual is 81.2%, lower than the borough and London average of 83.1% and 86.2% respectively.

TS077 - Sexual orientation	Scheme Area		Tower Hamlets	London
Straight or Heterosexual	62,336	81.2%	83.1%	86.2%
Gay or Lesbian	3,729	4.9%	4.0%	2.2%
Bisexual	2,417	3.1%	2.5%	2.0%
All other sexual orientations	566	0.7%	0.7%	0.4%
Not answered	7,711	10.0%	9.8%	9.5%

Source: 2021 Census

Pregnancy and Maternity

There is no Census 2021 data relating to this protected characteristic. Data from the Office for National Statistics⁷ shows that the conception rate across the borough as a whole was 62.8 per 1,000 women, which is below the London rate of 76.2 per 1,000 women. Data are not available at the ward level.

There is little evidence to draw upon about pregnancy and maternity in terms of transport and public realm. Looking beyond the UK, research published by the US Federal Transit Administration considered the challenges experienced by pregnant women using public transport⁸. Although this study is focused on public transport, its wider findings help to illustrate how streets and public realm pose challenges to pregnant women or people on maternity leave. Included in the findings are that unsafe footways and crossings pose a particular challenge to, that safety and security are critical concerns and that pregnant women may incur higher transport costs than other people because they make more trips due their role as a carer or make more expensive trips to address concerns about safety and security.

Parents/ Carers

The data below shows the proportion of unpaid carers in the scheme area, in Tower Hamlets and in London. The proportion of carers in the scheme area is equivalent to the borough average, and slightly lower than the London average.

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<https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/conceptionandfertilityrates/datasets/conceptionstatisticsenglandandwalesreferencetables>

⁸ <https://www.transit.dot.gov/sites/fta.dot.gov/files/2022-02/FTA-Report-No-0211.pdf>

TS039 - Provision of unpaid care	Scheme Area		Tower Hamlets	London
Provides no unpaid care	14861	93.7%	93.6%	92.8%
Provides 19 hours or less unpaid care a week	430	2.7%	2.8%	3.6%
Provides 20 to 49 hours unpaid care a week	254	1.6%	1.8%	1.7%
Provides 50 or more hours unpaid care a week	320	2.0%	1.8%	2.0%

Source: 2021 Census

The National Travel Survey (2019) suggests that one barrier preventing children walking to school is their parents not allowing them. A further study suggests parents might be less likely to cycle with their children due to perceived road safety risks, and as a result may opt to drive short journeys that could otherwise be walked or cycled⁹.

Gender Identity

In 2021 the Census included a question on gender identity. Lowest level data for this gender identity is at local authority level. There is a slightly lower proportion of Tower Hamlets residents whose gender is the same as registered at birth than the London average – 90.7% compared to 91.2%.

TS078 - Gender identity	Tower Hamlets	London
Gender identity the same as sex registered at birth	90.7%	91.2%
Gender identity different from sex registered at birth but no specific identity given	0.6%	0.5%
Trans woman	0.1%	0.2%
Trans man	0.1%	0.2%
All other gender identities	0.2%	0.1%
Not answered	8.3%	7.9%

Source: 2021 Census

Data is not available about mode choice preferences or other travel behaviours disaggregated by gender identity.

Socio-economic

The table below shows a comparison of levels of household deprivation in the scheme area to deprivation in Tower Hamlets and more widely across London. The four dimensions of deprivation measured are **Employment, Education, Health & disability,** and **Housing**. The data shows that deprivation, specifically severe deprivation (i.e. in more than one dimension)

⁹ BMC Public Health 2018 Understanding child and parent perceptions of barriers influencing children's active school travel
<https://bmcpublihealth.biomedcentral.com/track/pdf/10.1186/s12889-018-5874-y.pdf>
 Equality Impact Analysis

is slightly higher in the project area than in Tower Hamlets as a whole, and in turn much higher than in London. For example, 7.2% of households in the scheme area are deprived in three different dimensions compared to 5.9% Tower Hamlets average and 4.3% in London overall.

TS011 - Households by deprivation dimensions	Household is not deprived in any dimension	Household is deprived in one dimension	Household is deprived in two dimensions	Household is deprived in three dimensions	Household is deprived in four dimensions
Scheme Area	43.1%	32.1%	16.9%	7.2%	0.7%
Tower Hamlets	46.4%	31.8%	15.5%	5.9%	0.4%
London	48.1%	32.9%	14.4%	4.3%	0.4%

Source: 2021 Census

At the time of the 2021 Census, 57.9% of working age residents in the scheme area were employed. This is lower than the borough overall (58.7%), and less than London (59.4%). There is a higher percentage of residents who are economically inactive due to long term sickness or disability in the scheme area compared to Tower Hamlets and London averages. There is a higher percentage of retired residents in the scheme area compared to the borough average.

TS066 - Economic activity status	Scheme Area		Tower Hamlets	London
Economically active (excluding full-time students): In employment	8,037	57.9%	58.7%	59.4%
Economically active (excluding full-time students): Unemployed	689	5.0%	4.7%	4.1%
Economically active and a full-time student: In employment	354	2.6%	2.7%	2.0%
Economically active and a full-time student: Unemployed	165	1.2%	1.3%	0.7%
Economically inactive: Retired	949	6.8%	5.8%	12.9%
Economically inactive: Student	1,162	8.4%	9.6%	7.2%
Economically inactive: Looking after home or family	1,162	8.4%	8.4%	6.0%
Economically inactive: Long-term sick or disabled	683	4.9%	4.0%	3.6%
Economically inactive: Other	676	4.9%	4.7%	4.1%

Source: 2021 Census

There is an established link between poor health due to air pollution and socio-economic deprivation. Respiratory disease rates are strongly influenced by social deprivation and health inequalities – in 2012, asthma rates in the UK were 36% higher in the most deprived

communities than in the least deprived¹⁰. Nationally, people living in disadvantaged areas are more likely to live in hazardous environments due to high volumes of fast-moving traffic. Young people (11 to 15) from disadvantaged areas are more likely to be injured in traffic collisions than those living in higher income urban areas¹¹.

¹⁰ Asthma UK, On the Edge: How inequality affects people with asthma 2018

<https://www.asthma.org.uk/support-us/campaigns/publications/inequality/>

¹¹ Inequalities in Mobility and Access in the UK Transport System (Government Office for Science) -

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/784685/future_of_mobility_access.pdf

Section 4: Assessing the impacts on different groups and service delivery

Groups	Impact (positive / negative / neutral)	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
Protected		
Age (All age groups)	<p>Option 1: Neutral for Older people</p> <p>Negative for younger people</p> <p>Option 2: Neutral for Older people</p> <p>Positive for younger people</p> <p>Option 3: Neutral for Older people</p>	<p>Traffic data indicates a combination of increases and decreases in total traffic volumes in the scheme areas resulting from the Liveable Street scheme. It is estimated Option 1 would increase traffic flows lower to pre-scheme levels and Option 3 would re-introduce traffic levels which are a much smaller fraction of pre-scheme levels due to the retention the one-way system on Old Bethnal green Road and time restricted camera filters.</p> <p>Census 2021 data indicates that 10% of residents in the scheme area are aged 60 and over; this is a slightly higher proportion than the borough average of 8.4%.</p> <p><u>Option 1 – Remove closures</u></p> <p><u>Older people</u></p> <p>Potential positive impacts for older people</p> <ul style="list-style-type: none"> Older people may be more likely to use private cars and taxi services. A larger percentage of over 60s drive than any other age group in Tower Hamlets. Older people are more likely to use private cars, taxi, have a Blue Badge for age-related disabilities or Dial-a-Ride services for door-to-door journeys. They are also more likely to rely on family members or friends for travel support e.g. to access daily care or ferrying to medical appointments. Reinstating through-traffic could benefit older people through better travel opportunities by car across the local area. Feedback from residents and other road users has suggested that traffic restrictions has resulted in longer routes for diverted traffic and more traffic on roads outside of the Liveable Streets area. A reduction in congestion and the displacement of motor traffic onto main roads could potentially improve conditions for older people in the following ways: <ul style="list-style-type: none"> Bus journey times (older people are more likely to use bus services than other age groups)

Groups	Impact (positive / negative / neutral)	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
	Negative for younger people	<ul style="list-style-type: none"> Concerns have been raised about arrival speed of ambulances which older people are likely to need more than residents in other age groups. The removal of any hard physical closures and reinstatement of routes that allow unhindered emergency vehicle access could positively impact response times to the most critically ill people. Longer routes and time taken to navigate Liveable Streets areas may have a negative impact on the willingness of private hire vehicles from picking up residents in those areas. Removal of closures may result older residents whose day-to-day activities were limited due to a health problem or disability being more independent and mobile. <p>Potential negative impacts for older people</p> <ul style="list-style-type: none"> The age at which residents are most likely to be injured as pedestrians in Tower Hamlets is 10-15 years and 80-84 years as measured in five-year age bands based on 2017 population against the number of average annual casualties per 1000 population. (Source Transport Strategy evidence base LBTH LIP3). Increasing the amount of motor traffic on some roads in the area may increase the risk of collision between motor vehicles and people. This could increase levels of risk for older people particularly at crossing points across the area both. Increased traffic levels through the Bethnal Green area could cause additional challenges for older people whose day-to-day activities were limited due to a health problem or disability in comparison to other age groups, for example because it becomes more difficult to cross the road (people have to walk further to find a signalised or safe crossing point and have to wait for signals to change). There may be a negative impact on older people using streets where vehicle traffic volumes would increase. Older people may be less confident walking or cycling as a result of increased traffic, reducing opportunities for regular exercise which is important for health and wellbeing. Reopening streets to through-traffic will lead to an increase in traffic volumes and air pollution on road that saw reduced traffic as a result of the traffic restrictions. Within the scheme area NO2 levels reduced by 28.01% from the three NO2 monitoring sites in the scheme area. This is higher than average of 19.23% for comparable locations in other parts of the borough. Air pollution is to increase slightly where traffic will increase as a result of the removal of closures. Older people may be disproportionately affected by poor air quality, exacerbating certain health conditions.

Groups	Impact (positive / negative / neutral)	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
		<p><u>Young people & children</u></p> <p>Census 2021 data indicates that there are a slightly lower proportion of younger people living in the scheme area than in the borough as a whole. 16.3% of people in the scheme area are aged 0-14 compared to 17.5% across the borough.</p> <p>Potential positive impacts for younger people</p> <ul style="list-style-type: none"> • Some young people are driven as passengers, and as such the proposals could reduce their journey times. Those relying on bus services to access education and employment opportunities may also see improved journey times and reliability of their journeys on roads on the periphery of the scheme area where congestion may be reduced by reducing reliance on Hackney Road for access. • Removing the measures will have a disproportionately positive impact on younger people using streets where traffic will decrease such as Swanfield Street and Hackney Road through reduced road danger and air pollution. <p>Potential negative impacts for younger people</p> <ul style="list-style-type: none"> • Removing the measures may have a disproportionately negative impact on younger people using streets where traffic will increase through increased road danger and air pollution as a result of more motor traffic using the streets. • The reintroduction of through traffic may discourage young people from walking and cycling in the scheme area, reducing the amount of daily exercise that they take. • Reopening streets to through-traffic may lead to an increase in traffic volumes and therefore air pollution on certain roads. Within the scheme area NO2 levels reduced by 28.01% from the three NO2 monitoring sites in the scheme area. This is higher than average of 19.23% for comparable locations in other parts of the borough. <p><u>Option 2 – Retain the scheme</u></p> <p><u>Older people</u></p> <p>Potential positive impacts for older people</p>

Groups	Impact (positive / negative / neutral)	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
		<ul style="list-style-type: none"> The scheme has reduced traffic levels and therefore reduced the risk of collisions between motor vehicles and people particularly at crossing points in the area. Reduced traffic would give older people more confidence older people to walk or cycle increasing opportunities for regular exercise which is important for health and wellbeing. Air quality has improved on roads where traffic volume had reduced as a result of the traffic restrictions. Within the scheme area NO2 levels reduced by 28.01% from the three NO2 monitoring sites in the scheme area. This is higher than average of 19.23% for comparable locations in other parts of the borough. Air pollution is to increase slightly where traffic will increase. <p>Potential negative impacts for older people</p> <ul style="list-style-type: none"> The scheme has disproportionately impacted older people who are dependent on car travel. A larger percentage of over 60s drive than any other age group in Tower Hamlets. Older people are more likely to use private cars, taxi, have a Blue Badge for age-related disabilities or Dial-a-Ride services for door-to-door journeys. They are also more likely to rely on family members or friends for travel support e.g. to access daily care or ferrying to medical appointments. Feedback from residents and other road users has suggested that traffic restrictions have resulted in longer routes for diverted traffic and more traffic on roads outside of the scheme area. Retaining the scheme would mean access for private cars and taxi services remain dependent on convoluted routes. Increased congestion and displaced traffic would remain in parts of the area. These would present issues for older people in the following ways: <ul style="list-style-type: none"> Bus journey times (older people are more likely to use bus services than other age groups). Concerns have been raised about arrival speed of ambulances which older people are likely to need more than residents in other age groups. The removal of any hard physical closures and reinstatement of routes that allow unhindered emergency vehicle access could positively impact response times to the most critically ill people. Longer routes and time taken to navigate Liveable Streets areas may have a negative impact on the willingness of private hire vehicles from picking up residents in those areas. Removal of closures may result older residents whose day-to-day activities were limited due to a health problem or disability being more independent and mobile.

Groups	Impact (positive / negative / neutral)	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
		<p><u>Young people & children</u></p> <p>Census 2021 data indicates that there are a slightly lower proportion of younger people living in the scheme area than in the borough as a whole. 16.3% of people in the scheme area are aged 0-14 compared to 17.5% across the borough.</p> <p>Potential positive impacts for younger people</p> <ul style="list-style-type: none"> • The reduced traffic levels for a majority of the scheme area have reduce road danger. • The lower traffic levels young people from walking and cycling in the scheme area, reducing the amount of daily exercise that they take. • Reopening streets to through-traffic may lead to an increase in traffic volumes and therefore air pollution on roads where traffic volume had reduced as a result of the traffic restrictions. Within the scheme area NO2 levels reduced by 28.01% from the three NO2 monitoring sites in the scheme area. This is higher than average of 19.23% for comparable locations in other parts of the borough which have not had road closures. <p>Potential negative impacts for younger people</p> <ul style="list-style-type: none"> • A proportion of young people are driven as passengers, and as such the proposals could reduce their journey times. Those relying on bus services to access education and employment opportunities may also see improved journey times and reliability of their journeys on roads on the periphery of the scheme area where congestion may be reduced by allowing through-traffic to return. • Removing the measures will have a positive impact on younger people using streets where traffic will decrease such as Swanfield Street and Hackney Road through reduced road danger and air pollution. <p><u>Option 3 – alternative proposal</u></p> <p>Potential negative impacts for older people</p> <p>The positive impacts for older people of Option 3 mirror those for Option 1 above as there will be increase access for private vehicles and taxis.</p> <p>Potential negative impacts for older people</p>

Groups	Impact (positive / negative / neutral)	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
		<p>The negative impacts for older people of Option 3 are like those for Option 1 but are reduced due to a much lower increase in traffic. This is achieved through the retention of the one-way operation of Old Bethnal Green Road and new timed camera filters.</p> <p><u>Young people & children</u></p> <p>Potential negative impacts for younger people</p> <p>The positive impacts for younger people of Option 3 mirror those for Option 1 above as there will be increase access for private vehicles and taxis.</p> <p>Potential negative impacts for older people</p> <p>The negative impacts for younger people of Option 3 are like those for Option 1 but are reduced due to a much lower increase in traffic. This is achieved through the retention of the one-way operation of Old Bethnal Green Road and new timed camera filters.</p> <p><i>Actions to mitigate against any disproportionate impacts on this cohort is detailed in Section 5 'Impact analysis and action plan'</i></p>
<p>Disability (Physical, learning difficulties, mental health and medical conditions)</p>	<p>Option 1/2/3: Neutral</p>	<p>Traffic data indicates a combination of increases and decreases in total traffic volumes in the scheme areas resulting from the Liveable Street scheme. Option 1 would increase traffic flows close to pre-scheme levels and Option 3 would re-introduce traffic levels which are a small fraction of pre-scheme levels due to the retention the one-way system on Old Bethnal green Road and time restricted camera filters.</p> <p>In 2021 the census asked about residents' general health and limitation of day-to-day activities. Census 2021 data indicates that 5.8% of residents in the scheme area have bad or very bad health. There is a slightly higher proportion of people in the scheme area whose day-to-day activities are limited than in the wider borough.</p>

Groups	Impact (positive / negative / neutral)	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
		<p><u>Option 1 – Remove closures</u></p> <p>Potential positive impacts</p> <ul style="list-style-type: none"> • Disabled people are more likely than non-disabled people to rely upon family members or friends for daily care¹². The 2011 Census indicates that over 687,000 Londoners spend at least an hour a week caring for someone – equivalent to 8.5% of the population. The removal of the modal filters may disproportionately positively impact disabled people (especially those who have mobility issues via the potential reduction journey times and/or distance for carers who visit the area in a private car. This may allow carers to attend more regularly or reduce delays. • The existing restrictions may have negatively impacted journey times for those with mobility impairments who may find it more difficult to walk or cycle, and therefore need to make use of door-to-door transport services such as private cars. Increased journey times may have led to further discomfort and anxiety for some disabled people, and ultimately may have had a detrimental impact on their mental or physical health. The reintroduction of through-traffic is likely to benefit these people, with shortened journey times/distances. • Concerns have been raised about congestion due to reduced displacement of motor traffic onto main roads negatively impacting on arrival speed of ambulances which older people are likely to need more than residents in other age groups. The removal of any hard physical closures and reinstatement of routes that allow unhindered emergency vehicle access could positively impact response times to the most critically ill people.

¹² [https://www.london.gov.uk/sites/default/files/who_cares - helping londons unpaid carers by dr onkar sahota am.pdf](https://www.london.gov.uk/sites/default/files/who_cares_-_helping_londons_unpaid_carers_by_dr_onkar_sahota_am.pdf)

Groups	Impact (positive / negative / neutral)	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
		<ul style="list-style-type: none"> Concern has been raised by road users, particularly those taxi/uber drivers about lengthier routes, more congestion on roads outside of the scheme, impacting on the time taken to navigate Liveable Streets areas. This may lead to less private hire vehicles willing to pick up from residents within these schemes. Opening up the roads may result residents whose day-to-day activities were limited due to a health problem or disability being more independent and mobile. It will likely result in a reduction in the amount of money spent on private hire vehicles for these residents going about their daily life, particularly to hospital appointments. Research undertaken by TfL indicates that disabled Londoners are less likely to walk regularly. 84% of disabled Londoners reported that their disability limits their ability to travel, reflecting that disabled Londoners travel less often than non-disabled Londoners (1.9 compared with 2.4 trips on an average weekday). The proposal to open streets to make it easier to get around by car or taxi may result in people with disabilities becoming more independent. As part of the first stage consultation, respondents were asked to state if their day-to-day activities were limited due to a health problem or disability. For the Old Bethnal Green Road area consultation 124 respondents stated that their day-to-day activities were limited due to a health problem or disability. Analysis of these responses showed most respondents with disabilities had support for the removal of closures (66%). For the first stage Weavers consultation 168 respondents stated that their day-to-day activities were limited due to a health problem or disability. Analysis of these responses showed most respondents with disabilities had support for the removal of closures (63%). <p>Potential negative impacts</p> <ul style="list-style-type: none"> It is recognised that certain impairments may mean disabled people are more at risk of road danger, noise and pollution. Mobility impairment or mental health issues increase the challenge of day-to-day activities such as travelling. For people with mobility impairments, increased vehicle traffic on roads previously closed to through-traffic may disproportionately reduce their confidence in walking, cycling, using mobility aids and accessing public transport in the scheme area. The reintroduction of through-traffic could particularly impact blind and partially sighted people for whom walking is the primary mode of travel, by increasing road danger in the area. Reopening streets to through-traffic may lead to an increase in traffic volumes and therefore air pollution on roads where traffic volume had reduced as a result of the traffic restrictions. Within the scheme area NO2 levels reduced by 28.01% from the three NO2 monitoring sites in the scheme area. This is higher than average of

Groups	Impact (positive / negative / neutral)	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
		<p>19.23% for comparable locations in other parts of the borough which have not had road closures.</p> <p><u>Option 2 – Retain the scheme</u></p> <p>Potential positive impacts</p> <ul style="list-style-type: none"> • Mobility impairment or mental health issues increase the challenge of day-to-day activities such as travelling. For people with mobility impairments, the decrease in vehicle traffic has increased confidence in walking, cycling, using mobility aids and accessing public transport in the scheme area. • The reduction in traffic has had a positive impact on partially sighted people for whom walking is the primary mode of travel, by increasing road danger in the area. <p>Potential negative impacts</p> <ul style="list-style-type: none"> • Disabled people are more likely than non-disabled people to rely upon family members or friends for daily care¹³. The 2011 Census indicates that over 687,000 Londoners spend at least an hour a week caring for someone – equivalent to 8.5% of the population. The closures may disproportionately positively impact disabled people (especially those who have mobility issues via the potential reduction journey times and/or distance for carers who visit the area in a private car. This may allow carers to attend more regularly or reduce delays. • The existing restrictions may have negatively impacted journey times for those with mobility impairments who may find it more difficult to walk or cycle, and therefore need to make use of door-to-door transport services

¹³ [https://www.london.gov.uk/sites/default/files/who_cares - helping londons unpaid carers by dr onkar sahot a_m.pdf](https://www.london.gov.uk/sites/default/files/who_cares_-_helping_londons_unpaid_carers_by_dr_onkar_sahota_am.pdf)

Groups	Impact (positive / negative / neutral)	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
		<p>such as private cars. Increased journey times may have led to further discomfort and anxiety for some disabled people, and ultimately may have had a detrimental impact on their mental or physical health.</p> <ul style="list-style-type: none"> • The retention of physical closures will continue to hinder emergency vehicle access. This will negatively impact response times to the most critically ill people. • Concern has been raised by road users, particularly those taxi/uber drivers about lengthier routes, more congestion on roads outside of the scheme, impacting on the time taken to navigate Liveable Streets areas. This may lead to less private hire vehicles willing to pick up from residents within these schemes. Opening up the roads may result residents whose day-to-day activities were limited due to a health problem or disability being more independent and mobile. • Research undertaken by TfL indicates that disabled Londoners are less likely to walk regularly. 84% of disabled Londoners reported that their disability limits their ability to travel, reflecting that disabled Londoners travel less often than non-disabled Londoners (1.9 compared with 2.4 trips on an average weekday). The scheme has made it more difficult to get around by car or taxi may result in people with disabilities becoming more independent. <p><u>Option 3 – alternative proposal</u></p> <p>Potential positive impacts</p> <p>The positive impacts for disabled people of Option 3 mirror those for Option 1 above as there will be increase access for private vehicles and taxis.</p> <p>Potential negative impacts</p> <p>The negative impacts for disabled people of Option 3 are like those for Option 1 but are reduced due to a much lower increase in traffic. This is achieved through the retention of the one-way operation of Old Bethnal Green Road and new timed camera filters.</p> <p><i>Actions to mitigate against any disproportionate impacts on this cohort is detailed in Section 5 ‘Impact analysis and action plan’</i></p>

Groups	Impact (positive / negative / neutral)	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
Sex	Option 1/2/3: Neutral	<p>Traffic data indicates a combination of increases and decreases in total traffic volumes in the scheme areas resulting from the Liveable Street scheme. Option 1 would increase traffic flows close to pre-scheme levels and Option 3 would re-introduce traffic levels which are a small fraction of pre-scheme levels due to the retention the one-way system on Old Bethnal green Road and time restricted camera filters.</p> <p>Research carried out by TfL in 2014 identified that women make a greater number of journeys per weekday than men. Trips made by women tend to be shorter and completed using different types of transport than journeys made by men. The proposals aim to provide an environment which feels less threatening to all users by improving road safety, public spaces and walking and cycling routes including improvements to street lighting which aims to reduce fear of and actual crime in these areas.</p> <p><u>Option 1 – Remove closures</u></p> <p>Potential positive impacts</p> <ul style="list-style-type: none"> • Women are more likely than men to be travelling with buggies and/or shopping¹⁴, and this can affect transport choices. The proposal to open streets may make it easier and quicker to get around by car or taxi.

¹⁴ [Travel in London: Understanding our diverse communities 2019 \(tfl.gov.uk\)](https://tfl.gov.uk)

Groups	Impact (positive / negative / neutral)	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
		<p>Potential negative impacts</p> <ul style="list-style-type: none"> • Women are more likely than men to do a greater share of child caring responsibilities including children to school and may therefore be more exposed to increased road danger and air pollution resulting from increased traffic in the scheme area as a result of reopening the road to through-traffic. • The Tower Hamlets Annual Residents Survey (2019) found that women are more conscious than men of road danger when choosing how to travel. The presence of motor traffic may discourage women than men from cycling, therefore with higher traffic levels on streets in the scheme area may be less able to experience the benefits afforded by cycling. • Women are more likely than men to walk for local journeys and therefore more likely to be exposed to the negative consequences of more traffic on the streets such as increased road danger and air pollution <p><u>Option 2 – Retain the scheme</u></p> <p>Potential positive impacts</p> <ul style="list-style-type: none"> • Women are more likely than men to do a greater share of child caring responsibilities including children to school and may therefore be more likely to benefit from reduced road danger. • The Tower Hamlets Annual Residents Survey (2019) found that women are more conscious than men of road danger when choosing how to travel. The reduction in motor traffic may encourage more women than men to cycle. • Women are more likely than men to walk for local journeys and therefore more likely to reduced traffic o and resulting reduction in road danger and air pollution. <p>Potential negative impacts</p>

Groups	Impact (positive / negative / neutral)	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
		<ul style="list-style-type: none"> Women are more likely than men to be travelling with buggies and/or shopping¹⁵, and this can affect transport choices. The retention of the scheme would mean issues with getting around by car or taxi would remain. <p><u>Option 3 – alternative proposal</u></p> <p>Potential positive impacts</p> <p>The positive impacts of Option 3 mirror those for Option 1 above as there will be increase access for private vehicles and taxis.</p> <p>Potential negative impacts</p> <p>The negative impacts of Option 3 are like those for Option 1 but are reduced due to a much lower increase in traffic. This is achieved through the retention of the one-way operation of Old Bethnal Green Road and new timed camera filters.</p>
Gender reassignment	Option 1/2/3: Neutral	In general, it was not considered that people were particularly directly or indirectly disproportionately impacted by the proposals on the grounds of gender reassignment.

¹⁵ [Travel in London: Understanding our diverse communities 2019 \(tfl.gov.uk\)](https://www.tfl.gov.uk)

Groups	Impact (positive / negative / neutral)	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
Marriage and civil partnership	Option 1/2/3: Neutral	In general, it was not considered that people who are married or in a civil partnership were particularly directly or indirectly disproportionately impacted by the proposals.
Religion or philosophical belief	Option 1/2/3: Neutral	<p>There are a small number of religious buildings in the scheme area. Vehicle access will be improved through options 1 and 3 as a result of the removal of the closures. In contrast, worshippers may be discouraged from walking or cycling when visiting due to increased level of traffic, concern about safety and pollution.</p> <p>In general, it was not considered that people from different religious groups were particularly directly or indirectly disproportionately impacted by either option.</p>
Race	Option 1/2/3: Neutral	<p>Traffic data indicates a combination of increases and decreases in total traffic volumes in the scheme areas resulting from the Liveable Street scheme. Option 1 would increase traffic flows close to pre-scheme levels and Option 3 would re-introduce traffic levels which are a small fraction of pre-scheme levels due to the retention the one-way system on Old Bethnal green Road and time restricted camera filters.</p> <p>Census 2021 data indicates that there is a slightly higher proportion of Asian, Asian British or Asian Welsh: Bangladeshi in the scheme area than the borough average (35.6% compared to 34.6%). There is also a higher proportion of White: British in the scheme area than in the borough as a whole (27.7% compared to 22.9%).</p>

Groups	Impact (positive / negative / neutral)	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
		<p>In terms of transport mode used, across all Londoners, there is little difference in the frequency of walking and cycling between white Londoners and black, Asian and minority ethnic Londoners¹⁶ while car use is slightly higher among white Londoners. Although ethnic minority Londoners on average have lower car usage than white Londoners, Asian Londoners exhibit higher car usage than other minority ethnic groups.</p> <p><u>Option 1 – Remove closures</u></p> <p>Potential positive impacts</p> <ul style="list-style-type: none"> The removal of the closures may improve bus journey times and bus journey time reliability on the periphery of the scheme area by reducing traffic congestion on these roads, which could benefit black, Asian and minority ethnic people who are more likely to travel by bus than white Londoners. <p>Potential negative impacts</p> <ul style="list-style-type: none"> JSNA data from 2015 shows that the prevalence of asthma is greatest among some ethnic minority groups, with 12.9% of the borough’s South Asian population aged 70+ diagnosed with asthma compared to 8.3% of the white and 5.2% of the black population respectively. Reopening streets to through-traffic may lead to an increase in traffic volumes and therefore air pollution on roads where traffic volume had reduced as a result of the traffic restrictions. Within the scheme area NO2 levels reduced by 28.01% from the three NO2 monitoring sites in the scheme area. This is higher than average of 19.23% for comparable locations in other parts of the borough which have not had road closures. These are likely to increase where traffic will increase as a result of the removal of closures.

¹⁶ <https://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>

Groups	Impact (positive / negative / neutral)	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
		<p><u>Option 2 – Retain the scheme</u></p> <p>Potential positive impacts</p> <ul style="list-style-type: none"> The scheme has reduced traffic volumes and air pollution on roads where traffic volume had reduced as a result of the traffic restrictions. JSNA data from 2015 shows that the prevalence of asthma is greatest among some ethnic minority groups, with 12.9% of the borough’s South Asian population aged 70+ diagnosed with asthma compared to 8.3% of the white and 5.2% of the black population respectively. The scheme has increased opportunities to shift travel mode and undertake regular physical exercise particularly through active travel. <p>Potential negative impacts</p> <ul style="list-style-type: none"> The impact of the scheme on bus journey times and bus journey time reliability would remain. This has disproportionately impacted on black, Asian and minority ethnic people who are more likely to travel by bus than white Londoners. <p><u>Option 3 – alternative proposal</u></p> <p>Potential positive impacts</p> <p>The positive impacts of Option 3 mirror those for Option 1 above as there will be increase access for private vehicles and taxis.</p> <p>Potential negative impacts</p> <p>The negative impacts of Option 3 are like those for Option 1 but are reduced due to a much lower increase in traffic. This is achieved through the retention of the one-way operation of Old Bethnal Green Road and new timed camera filters.</p> <p><i>Actions to mitigate against any disproportionate impacts on this cohort is detailed in Section 5 ‘Impact analysis and action plan’</i></p>

Groups	Impact (positive / negative / neutral)	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
Sexual orientation	Option 1/2/3: Neutral	In general, it was not considered that people were particularly directly or indirectly disproportionately impacted by the proposals based on sexual orientation.
Pregnancy and maternity		<p>There is no Census 2021 data relating to this protected characteristic. We will investigate other data relating to this cohort. Data from the Office for National Statistics¹⁷ shows that the conception rate across the borough as a whole was 62.8 per 1,000 women, which is below the London rate of 76.2 per 1,000 women. Data are not available at the ward level.</p> <p><u>Option 1 – Remove closures</u></p> <p>Potential positive impacts</p> <ul style="list-style-type: none"> • There may be minor benefits for pregnancy and maternity from the removal of the traffic restrictions, for people using or more reliant upon motor vehicles for journeys. Pregnant women and people on maternity leave may be more likely to use a private motor vehicle or a taxi/private hire vehicle because their mobility may be impaired, they may feel less confident walking, cycling or using public transport, and may have lots of things to carry having had a new baby. Facilitating through-traffic may improve journey times and accessibility for drivers making local journeys.

Groups	Impact (positive / negative / neutral)	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
		<ul style="list-style-type: none"> A report by TfL on the barriers of using public transport found that women are more likely than men to be travelling with buggies and/or shopping, and this can affect transport choices. The proposal to open streets may make it easier and quicker to get around by car or taxi. <p>Potential negative impacts</p> <ul style="list-style-type: none"> Reopening streets to through-traffic may lead to an increase in traffic volumes and therefore air pollution on roads where traffic volume had reduced as a result of the traffic restrictions. Within the scheme area NO2 levels reduced by 28.01% from the three NO2 monitoring sites in the scheme area. This is higher than average of 19.23% for comparable locations in other parts of the borough which have not had road closures. These are likely to increase where traffic will increase as a result of the removal of closures An increase in local air pollution can be harmful for babies in the womb and may cause premature birth or low weight birth. Pregnant women are in a higher risk category than the average person in terms of poor air quality, with academic studies showing spikes in pollution have been linked to spikes in miscarriage numbers, with high NO² levels in particular having potential detrimental effects on unborn children. More traffic on previously quiet streets may deter pregnant women or people on maternity leave from walking in the neighbourhood. They may have concerns road safety or increased exposure of themselves or their baby to noise and air pollution. This may result in a reduction in levels of physical exercise in this cohort. <p><u>Option 2 – Retain the scheme</u></p> <p>Potential positive impacts</p> <ul style="list-style-type: none"> Retaining the scheme would retain the reduction in traffic volumes air pollution on most roads in the scheme area. Local air pollution can be harmful for babies in the womb and may cause premature birth or low weight birth. Pregnant women are in a higher risk category than the average person in terms of poor air quality, with academic studies showing spikes in pollution have been linked to spikes in miscarriage numbers, with high NO² levels in particular having potential detrimental effects on unborn children. Quieter streets may encourage pregnant women or people on maternity leave to walk in the neighbourhood due to feeling safer. This may result in a increased levels of physical exercise in this cohort. <p>Potential negative impacts</p> <ul style="list-style-type: none"> Pregnant women and people on maternity leave may be more likely to use a private motor vehicle or a taxi/private hire vehicle because their mobility may be impaired, they may feel less confident walking, cycling or

Groups	Impact (positive / negative / neutral)	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
		<p>using public transport, and may have lots of things to carry having had a new baby. Retaining closures would also retain the increased journey times and restricted accessibility for drivers making local journeys by car or taxi.</p> <p><u>Option 3 – alternative proposal</u></p> <p>The negative impacts of Option 3 relating to increased traffic and air pollution are like those for Option 1 but are reduced due to a much lower increase in traffic. This is achieved through the retention of the one-way operation of Old Bethnal Green Road and new timed camera filters.</p> <p><i>Actions to mitigate against any disproportionate impacts on this cohort is detailed in Section 5 ‘Impact analysis and action plan’</i></p>
Other		
Socio-economic		<p>Deprivation data is measured through four dimensions: Employment, Education, Health & disability, and Housing. Census 2021 data shows that deprivation, specifically severe deprivation (i.e. in more than one dimension) is slightly higher in the scheme area than in Tower Hamlets as a whole, and in turn much higher than in London. For example, 7.2% of households in the scheme area are deprived in three different dimensions compared to 5.9% Tower Hamlets average and 4.3% in London overall.</p> <p><u>Option 1 – Remove closures</u></p> <p>Potential positive impacts</p> <ul style="list-style-type: none"> • The removal of measures could benefit those on low incomes who may be reliant on cars, such as those undertaking work or caring responsibilities and/or travelling at times of the day when public transport

Groups	Impact (positive / negative / neutral)	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
		<p>accessibility is poor. This is because they may benefit from reduced vehicle journey lengths and times although journey time savings are likely to be marginal for anything but short car journeys¹⁸.</p> <ul style="list-style-type: none"> • Removing the closures could help people who rely on cars to get around, including people who use a car for work such as taxi or PHV drivers as they will benefit from the potential reduction in journey times within the neighbourhood. The potential reduction in journey time may result in a corresponding reduction in amount of fuel used. The cost of fuel has been increasing recently so less fuel used may result in less money spent on fuel and more income. • Removing the closures could also reduce congestion on the boundary roads thus improving bus journey times and benefiting people on low incomes who may be more reliant on buses. It is however acknowledged that these journey time saving benefits are unlikely to be permanent, as DfT data suggests that motor traffic volumes were rising in Tower Hamlets before the pandemic, if this trend resumes post-pandemic, it is likely to diminish short-term decongestion benefits from removing the scheme¹⁹. <p>Potential negative impacts</p> <ul style="list-style-type: none"> • Whilst the number of vehicles registered in the borough has increased slightly in recent years, Tower Hamlets still has one of the lowest levels of car ownership in London. Many households on low incomes are not able to afford a car. It is recognised that those on low incomes in London are less likely to drive, and more likely to walk, cycle or use bus services. Affordability of car ownership may mean that there is no impact in the levels of walking as a result of the removal of the scheme, though safety and cycling prevalence may decline.

¹⁸ <https://democracy.islington.gov.uk/documents/s26001/Appendix%20-%20Steer%20Journey%20time%20analysis%20for%20PFS.pdf>

¹⁹ <https://roadtraffic.dft.gov.uk/local-authorities/93>

Groups	Impact (positive / negative / neutral)	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
		<p><u>Option 2 – Retain the scheme</u></p> <p>Potential positive impacts</p> <ul style="list-style-type: none"> Many households on low incomes are not able to afford a car. Those on low incomes in London are less likely to drive, and more likely to walk, cycle or use bus services. Retaining the scheme would benefit those on low income who are less likely to drive, and more likely to walk or cycle. <p>Potential negative impacts</p> <ul style="list-style-type: none"> The adverse impacts of the scheme on those who rely on cars to get around would remain. This includes people who use a car for work such as taxi or PHV drivers as they have experienced increased journey times within the neighbourhood. This increase in journey time may have resulted in increased fuel costs. Retaining the scheme would mean congestion on the boundary roads would remain. This has impacted on bus journey times which are more likely to be used by people on low incomes who may be more reliant on buses. <p>Potential negative impacts</p> <p><u>Option 3 – alternative proposal</u></p> <p>Potential positive impacts</p> <p>The positive impacts of Option 3 mirror those for Option 1 above as there will be increase access for private vehicles and taxis.</p> <p>Potential negative impacts</p> <p>The negative impacts of Option 3 are like those for Option 1 but are reduced due to a much lower increase in traffic. This is achieved through the retention of the one-way operation of Old Bethnal Green Road and new timed camera filters.</p> <p><i>Actions to mitigate against any disproportionate impacts on this cohort is detailed in Section 5 ‘Impact analysis and action plan’</i></p>
Parents/Carers		

Groups	Impact (positive / negative / neutral)	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
		<p>Census 2021 data indicates that the proportion of residents who have some caring responsibility is 12% in the scheme area. This is one percentage point higher than the borough average, and also slightly lower than the London average.</p> <p><u>Option 1 – Remove closures</u></p> <p>Potential positive impacts</p> <ul style="list-style-type: none"> • The removal of the measures and reintroduction of through traffic could benefit those who drive their children to a school in the area by reducing the driving distance to school and potentially reducing journey times, although as traffic returns to previously quiet streets, time savings may be marginal. • As part of the first stage consultation, respondents reported increased journey times for parents and those providing care. The proposal may make it easier parents/carers who juggle school drop off and pick up and also rely on their car to get to work / who use their car for employment. These measures may improve parents / carers ability to access the workplace and/or consider employment options they previously felt unavailable to them due to their parent/carer responsibilities. • The proposal could also benefit professional carers who use a car to visit clients by reducing the amount of time it takes to get from client to client. The schemes have increased both journey mileage and amount of time in traffic and may see a reduction in the amount of fuel used and a reduction in the overall cost of fuelling their vehicle. Unpaid carers may also experience the same benefits as professional carers. <p>Potential negative impacts</p> <ul style="list-style-type: none"> • The reintroduction of through-traffic on previously quiet streets may make it more difficult to walk or cycle in the area with children or to walk with children in pushchairs, which may deter them walking and cycling and thus benefiting from physical exercise. • The removal of the modal filters may reduce the opportunity for parents / carers to escort or enable their children to safely walk, scoot or cycle to school. The removal of the traffic measures and reintroduction of through-traffic could also negatively impact parents and carers walking or cycling along streets where mean vehicle volumes were shown to have decreased. This may particularly be the case where traffic count data shows that vehicle volumes have decreased on roads adjacent to school sites since the introduction of the traffic measures. <p><u>Option 2 – Retain the scheme</u></p>

Groups	Impact (positive / negative / neutral)	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
		<p>Potential positive impacts</p> <ul style="list-style-type: none"> • The scheme has made it easier to walk and cycle in the area with children or to walk with children in pushchairs. This may encourage walking and cycling and thus benefiting from physical exercise. • The scheme has increased the opportunity for parents / carers to escort or enable their children to safely walk, scoot or cycle to school. <p>Potential negative impacts</p> <ul style="list-style-type: none"> • The scheme has impacted those who drive their children to a school in the area and increased driving distance and journey times to school. Although as traffic returns to previously quiet streets, time savings may be marginal. • As part of the first stage consultation, respondents reported increased journey times for parents and those providing care. The proposal may make it easier parents/carers who juggle school drop off and pick up and rely on their car to get to work / who use their car for employment. • The scheme has an adverse impact on professional carers who use a car to visit clients by reducing the amount of time it takes to get from client to client. The scheme has increased both journey mileage and amount of time in traffic. <p><u>Option 3 – alternative proposal</u></p> <p>Potential positive impacts</p> <p>The positive impacts of Option 3 mirror those for Option 1 above as there will be increase access for private vehicles and taxis.</p> <p>Potential negative impacts</p> <p>The negative impacts of Option 3 are like those for Option 1 but are reduced due to a much lower increase in traffic. This is achieved through the retention of the one-way operation of Old Bethnal Green Road and new timed camera filters.</p> <p><i>Actions to mitigate against any disproportionate impacts on this cohort is detailed in Section 5 ‘Impact analysis and action plan’</i></p>

Groups	Impact (positive / negative / neutral)	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
People with different Gender Identities e.g. Gender fluid, Non-Binary etc	Option 1/2/3: Neutral	In general, it was not considered that people were particularly directly or indirectly disproportionately impacted by the proposals based on gender identity.
Any other groups	<input type="checkbox"/>	

Section 5: Impact analysis and action plan

Options 1 and 3 mitigations:

A key negative impact from Options 1 and 3 are increased traffic and the resulting increase in air pollution and risk to road safety. The measures proposed in the table below would seek to mitigate this negative impact.

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Update on progress
Data collection to measure the impact of proposals	<i>Data collection</i>	Six-month monitoring	Simon Baxter	TBC
<p>The proposals include plans to create a network of accessible walking routes across Bethnal Green. Creating this network would make it easier for residents to access important services including doctors' surgeries, shops and public transport.</p> <p>There are currently many examples across the area where it is difficult to cross, particularly for wheelchair users. Level or flush access between the pavement and road is essential for most wheelchair users. We would improve crossing points either through dropped kerbs or raised crossings to avoid the need for wheelchair users to make lengthy detours to cross the road.</p> <p>This proposal mitigates against potential impact on road safety identified in section 4 particularly for older and younger people. The proposals would also make it significantly easier for disabled residents to access important services including doctors' surgeries, shops and public transport.</p>	Proposed area wide pedestrian improvements	These works would be undertaken alongside works to remove closures if approved.	Simon Baxter	TBC
<p>Explore traffic calming measures mitigate impact of through traffic.</p> <p>The Tower Hamlets Electric Vehicle Delivery Plan argues that accelerating the switch to electric vehicles will require</p>	Introduction of speed calming measures	These works would be undertaken alongside works to remove closures if approved.	Simon Baxter	TBC

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Update on progress
<p>potential users to feel confident that there is an adequate number of charging points to meet their needs.</p> <p>This proposal mitigates against potential impact on road safety identified in section 4 particularly for older and younger people.</p>				
<p>Increase electric vehicle charging points in the area in order facilitate adoption of electric vehicles.</p> <p>This will mitigate the air quality related negative identified in section 4 by contributing to lowering emissions from local owned vehicles.</p>	<p>Increase in fast (7kw-22kw) and slow (5kw) charging points in the area</p>	<p>New charging points would be delivered within 6 months of decision</p>	<p>Simon Baxter</p>	<p>TBC</p>
<p>Expand car club provision in the area</p> <p>Car clubs replace privately owned cars with a much smaller number of more efficiently used vehicles, freeing up considerable amounts of street space for other uses.</p> <p>The latest COMO UK annual report estimates that each car club vehicle in the UK is replacing 2010 private cars.</p> <p>Average UK car club vehicles have average NOx emissions of 0.03 g/km and 0.38 g/km for cars and vans respectively. This is 89% and 67% lower, respectively, than the UK averages (0.32g/km and 1.16 g/km). PM2.5 emissions are also significantly lower than the UK averages for cars and vans, with car club vehicles having 72% and 90% lower emissions per km, respectively.</p>	<p>provision of more car club bays and vehicles in the scheme area.</p>	<p>New car club bays would be delivered within 6 months of decision</p>	<p>Simon Baxter</p>	<p>TBC</p>

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Update on progress
Increased car club provision will contribute to mitigating the negative impacts of increased traffic identified in section 4.				

Option 2 mitigation

A key negative impact from Option 2 is access for residents who rely on vehicle use and emergency vehicles. The measures proposed in the table below would seek to mitigate this negative impact.

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Update on progress
Replacement of physical closures with cameras closures that allow for exemptions for residents and emergency vehicles	Install new cameras and remove physical closures	Order cameras and draft new traffic management order as soon as a decision is made	Simon Baxter	TBC




Section 6: Monitoring

What monitoring processes have been put in place to check the delivery of the above action plan and impact on equality groups?

Monthly monitoring of the usage of the parking bays with the one hour free parking facility.
Monthly data from the Tower Hamlets Nitrogen Dioxide Diffusion Tube Results.

Appendix A

EIA decision rating

Decision	Action	Risk
<p>As a result of performing the EIA, it is evident that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a Protected Characteristic under the Equality Act and appropriate mitigations cannot be put in place to mitigate against negative impact. It is recommended that this proposal be suspended until further work is undertaken.</p>	<p>Suspend – Further Work Required</p>	<p>Red</p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, there is a genuine determining reason that could legitimise or justify the use of this policy.</p>	<p>Further (specialist) advice should be taken</p>	<p>Red Amber</p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negatively impact (as described above) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, this risk may be removed or reduced by implementing the actions detailed within the <i>Impact analysis and action plan</i> section of this document.</p>	<p>Proceed pending agreement of mitigating action</p>	<p>Amber</p> 

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Appendix H - Background Data

Part 1: Local Traffic Data

Part 2: DfT Boundary Road Data

Part 3: iBus data

Part 4: Pre-scheme and post scheme collision data

Part 5: Pre-scheme and post scheme air pollution data

Part 6: Scheme area pedestrian count data

Part 7: Scheme area cycle count data

Part 8: Hackney Road/Cambridge Heath Road turning count data

Part 1: Local Traffic Data

Bethnal Green Scheme Area Traffic Flow Changes 2019-2022						
	Direction 1	Average Volume		Direction 2		Average Volume
Ravenscroft Road	Southbound	-9%		Northbound		-48%
Horatio Street	Southbound	70%		Northbound		278%
Ropley Street	Southbound	89%		Northbound		-11%
Temple Street	Southbound	-28%		Northbound		-76%
B118 Old Bethnal Green Road	Westbound	-86%		Eastbound		-70%
B108 Warner Place	Southbound	12%		Northbound		-9%
B108 Squirries Street	Southbound	-16%		Northbound		-24%
Columbia Road	Southbound	18%		Eastbound		-43%
B118 Columbia Road	Westbound	-53%		Eastbound		-59%
Virginia Road	Westbound	55%		Eastbound		20%
Swanfield Street (North)	Southbound	209%		Northbound		80%

Part 2: DfT Boundary Road Data

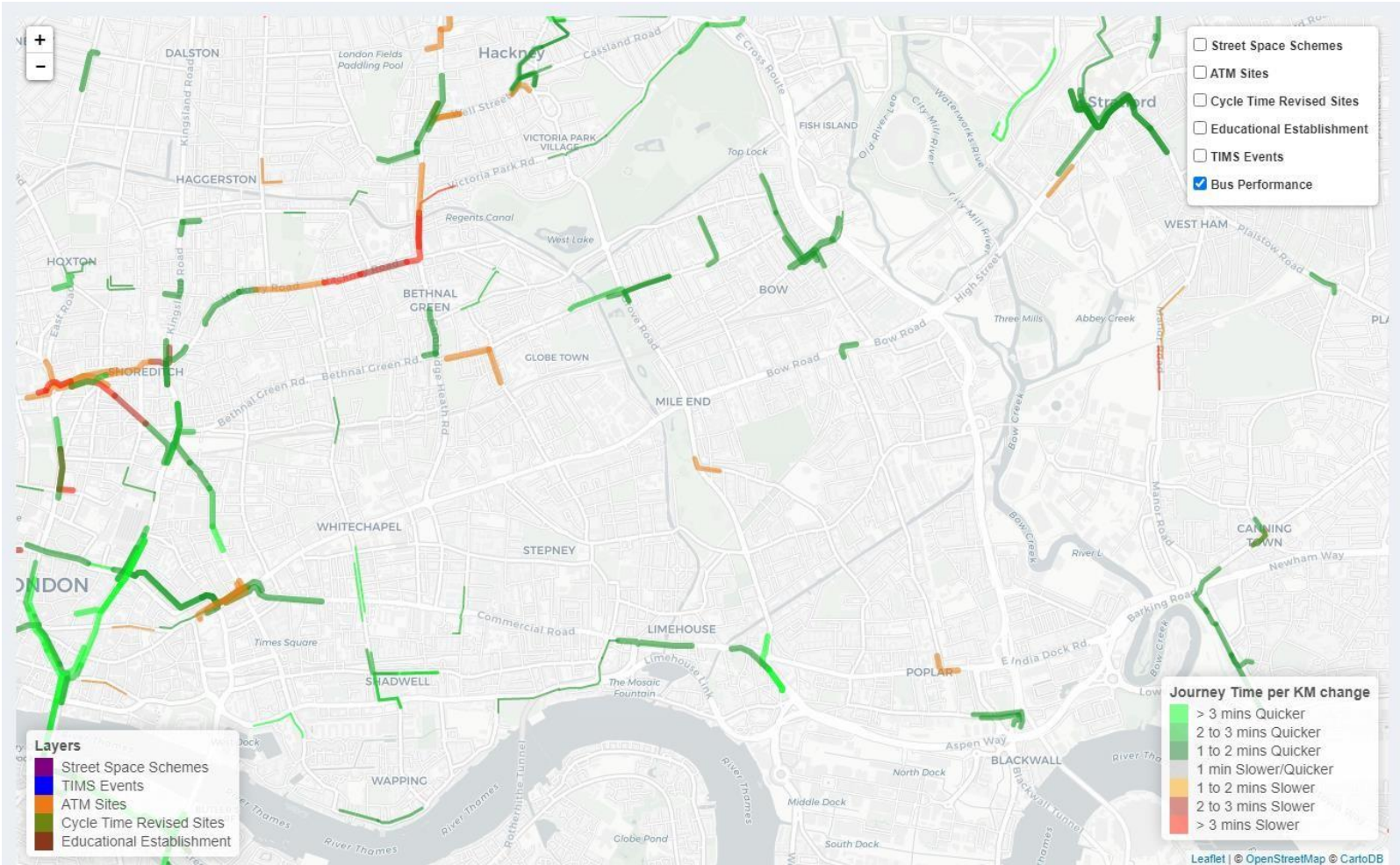
		Average delay (spvpm) ^{1,2,3,4,5}			
Road	Road Name(s)	2019 ⁶	2020 ⁷	2021	change on 2019
A1208	Hackney Road	136.0	207.1	218.7	60.81%
A1209	Bethnal Green Road	164.0	156.5	186.1	13.48%
A11	Whitechapel Road/Bow Road	155.0	137.8	169.7	9.48%
A13	Commercial Road	158.0	179.0	167.6	6.08%
A107	Cambridge Heath Road	172.9	165.4	171.1	-1.04%
A1202	Commercial Street	275.7	219.9	215.6	-21.80%
A1203	Highway/ Limehouse Link	120.7	74.8	75.3	-37.61%

Part 3: iBus data

Appendix-Bus journey time comparison data

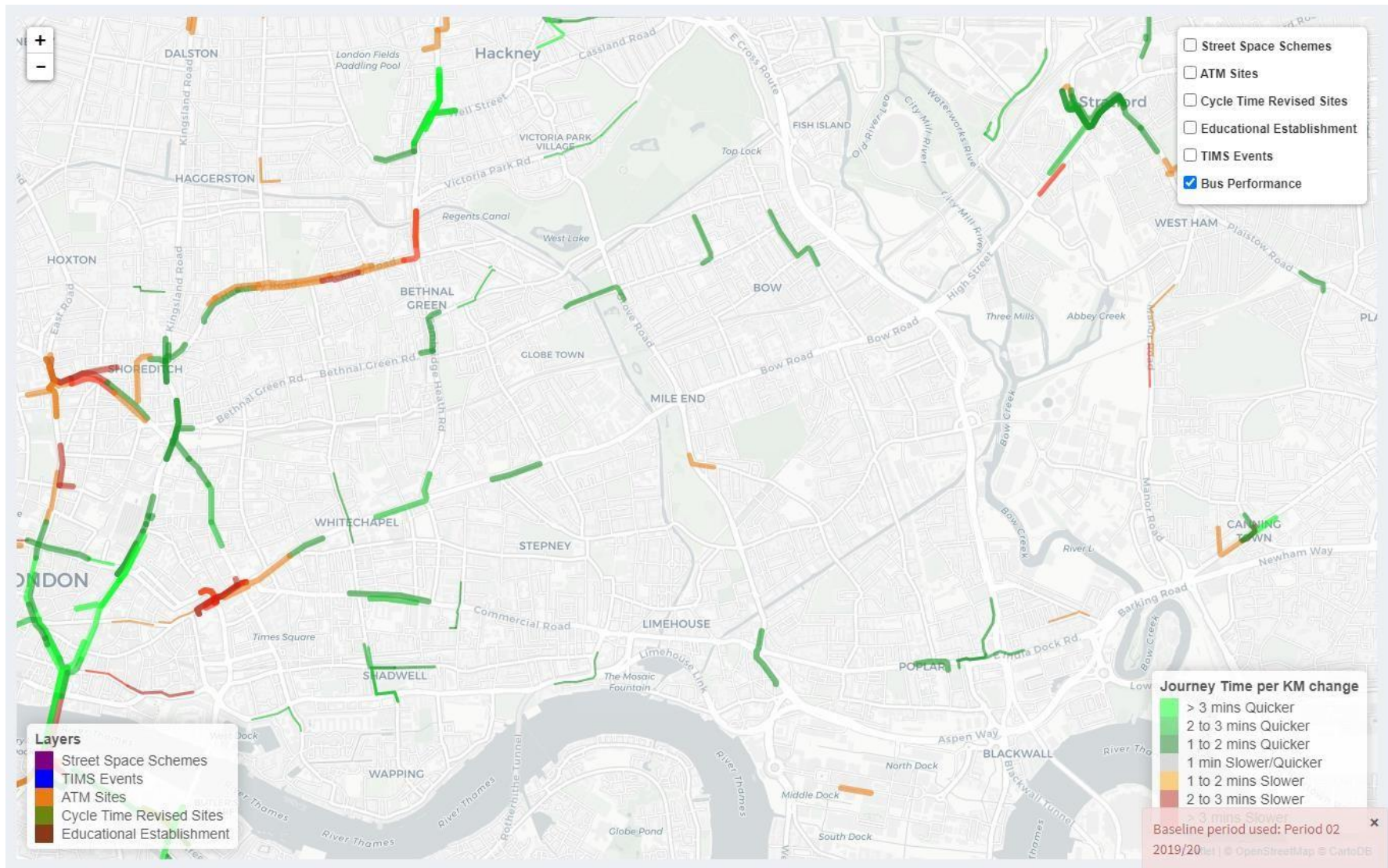
- a) Tower Hamlets iBus Map. 30 April to 27 May 2022 compared with P2 2019/20 – AM Peak (0700-1000)
- b) Tower Hamlets iBus Map. 30 April to 27 May 2022 compared with P2 2019/20 – Inter Peak (1000-1600)
- c) Tower Hamlets iBus Map. 30 April to 27 May 2022 compared with P2 2019/20 – PM Peak (1600-1900)
- d) Tower Hamlets iBus Map. 1 May to 28 May 2021 compared with P2 2019/20 – AM Peak (0700-1000)
- e) Tower Hamlets iBus Map. 1 May to 28 May 2021 compared with P2 2019/20 – Inter Peak (1000-1600)
- f) Tower Hamlets iBus Map. 1 May to 28 May 2021 compared with P2 2019/20 – PM Peak (1600-1900)

Tower Hamlets iBus Map. 30 April to 27 May 2022 compared with P2 2019/20 – AM Peak (0700-1000)

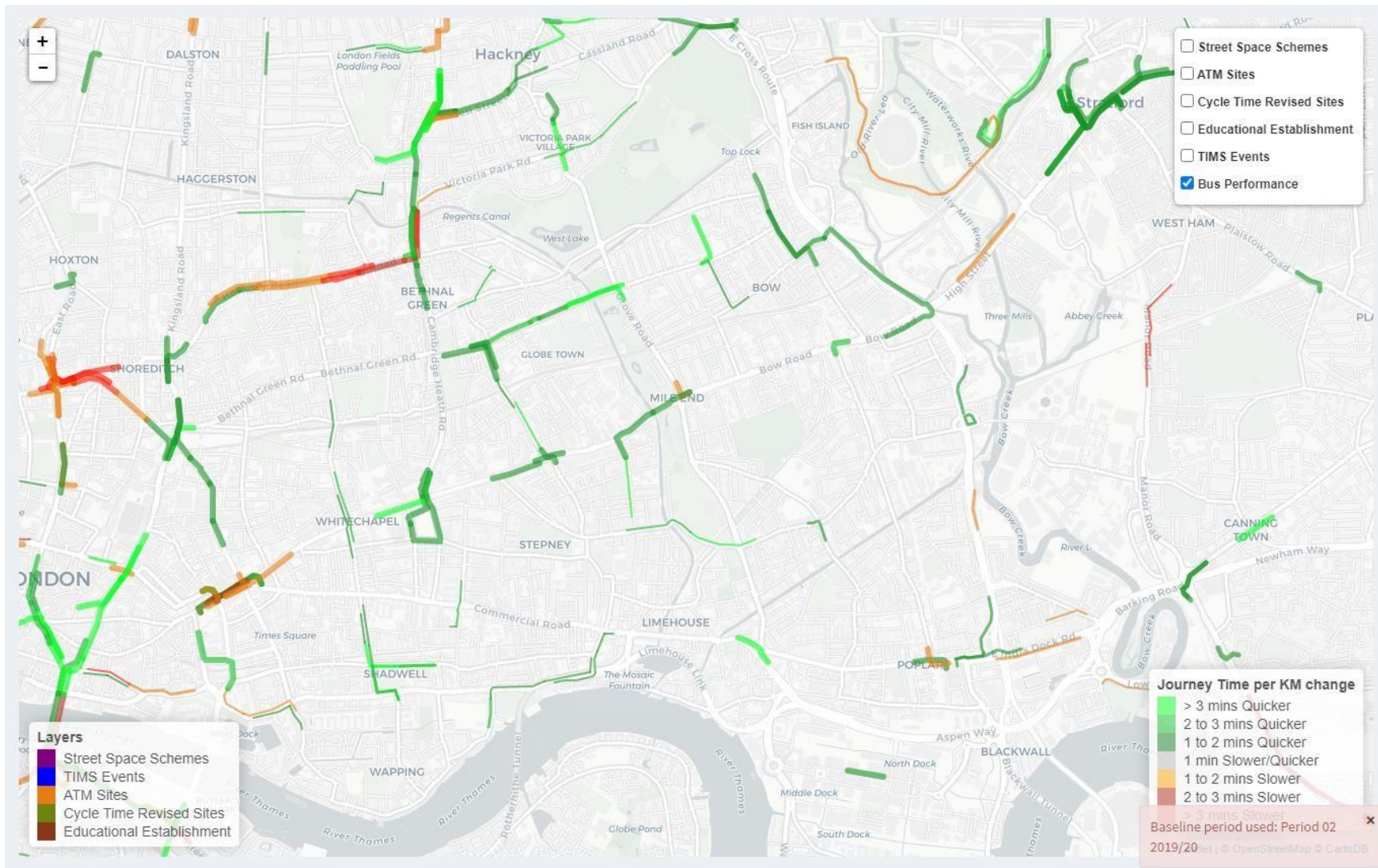


Tower Hamlets iBus Map. 30 April to 27 May 2022 compared with P2 2019/20 – Inter Peak (1000-1600)

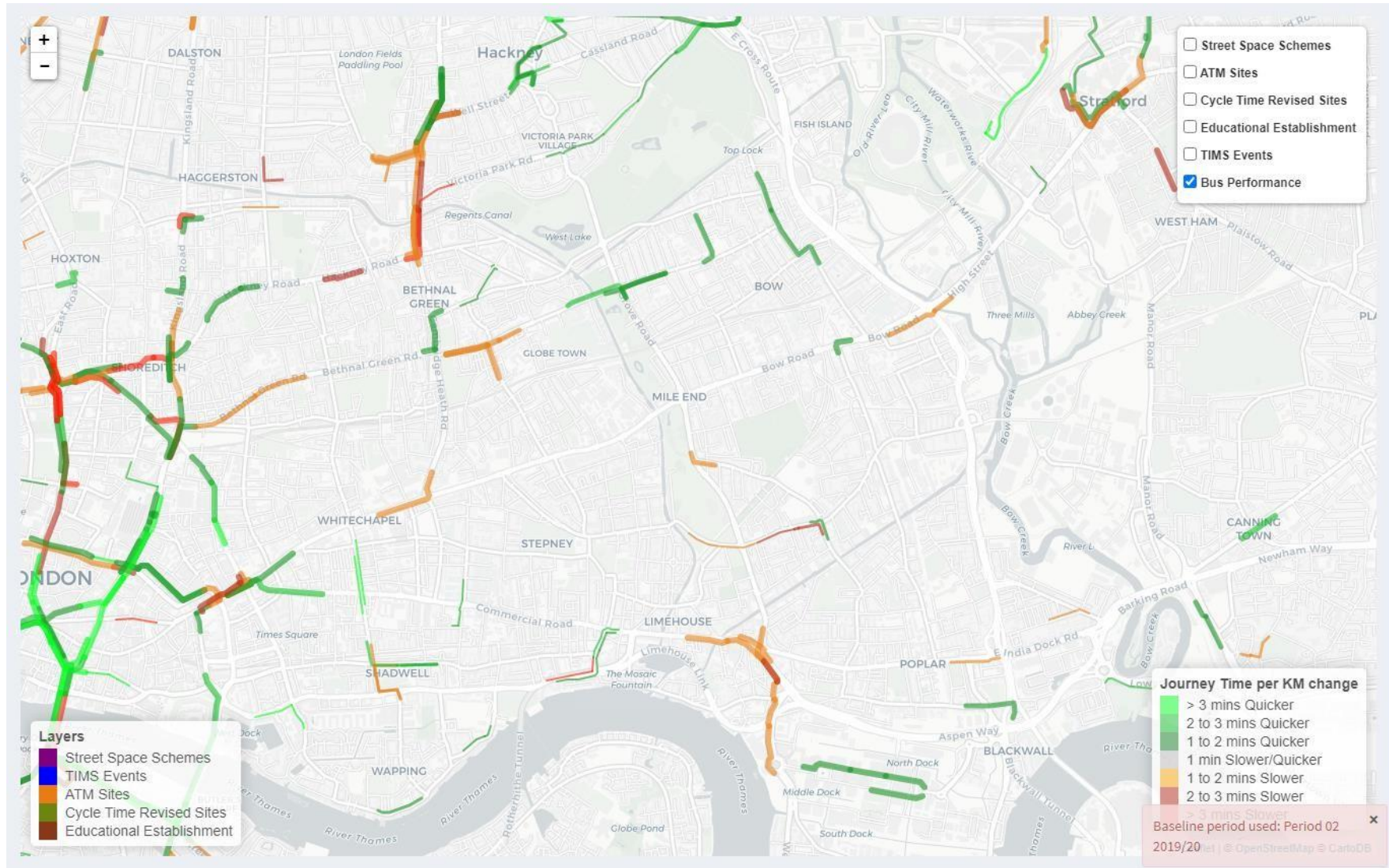
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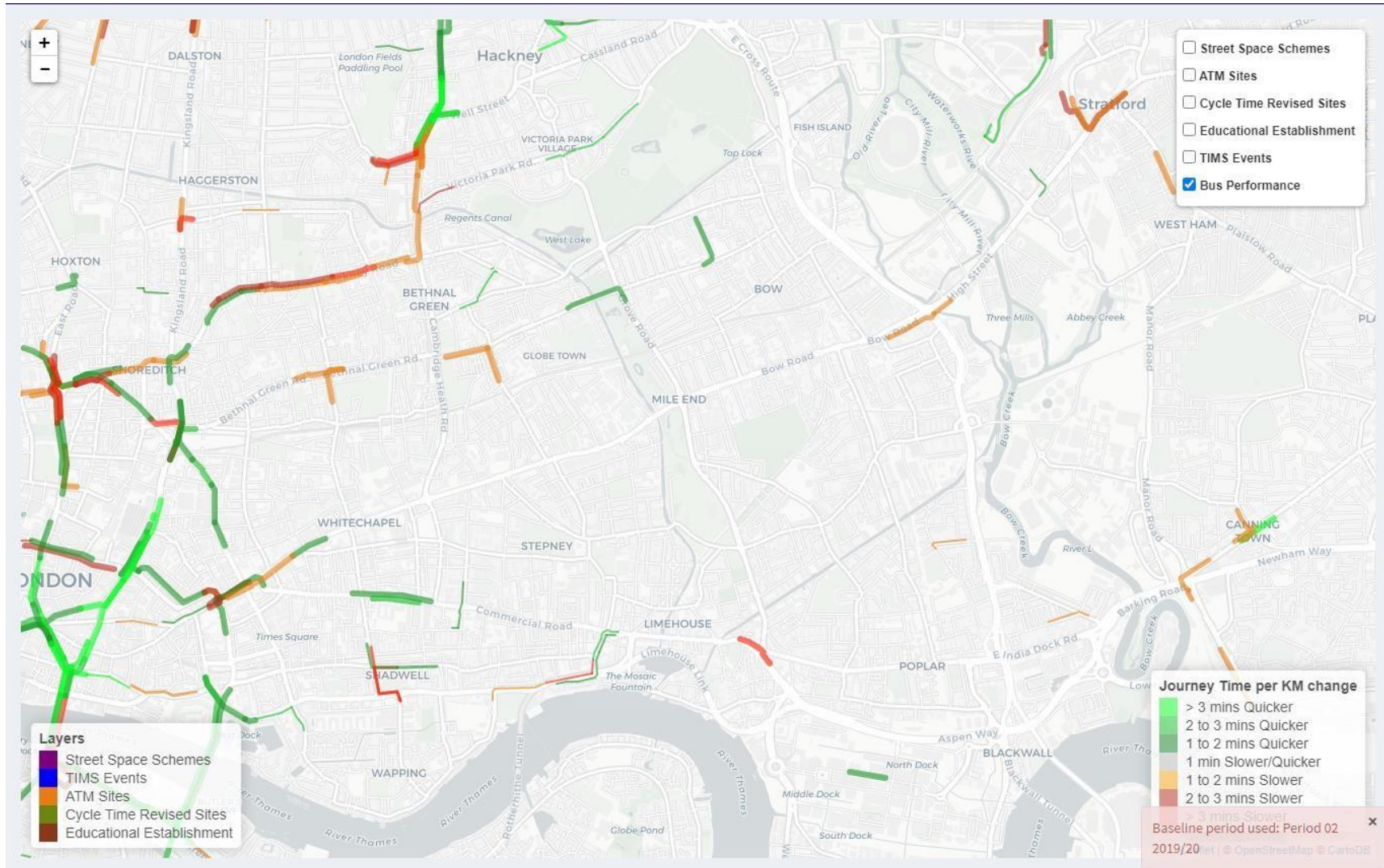
Tower Hamlets iBus Map. 30 April to 27 May 2022 compared with P2 2019/20 – PM Peak (1600-1900)



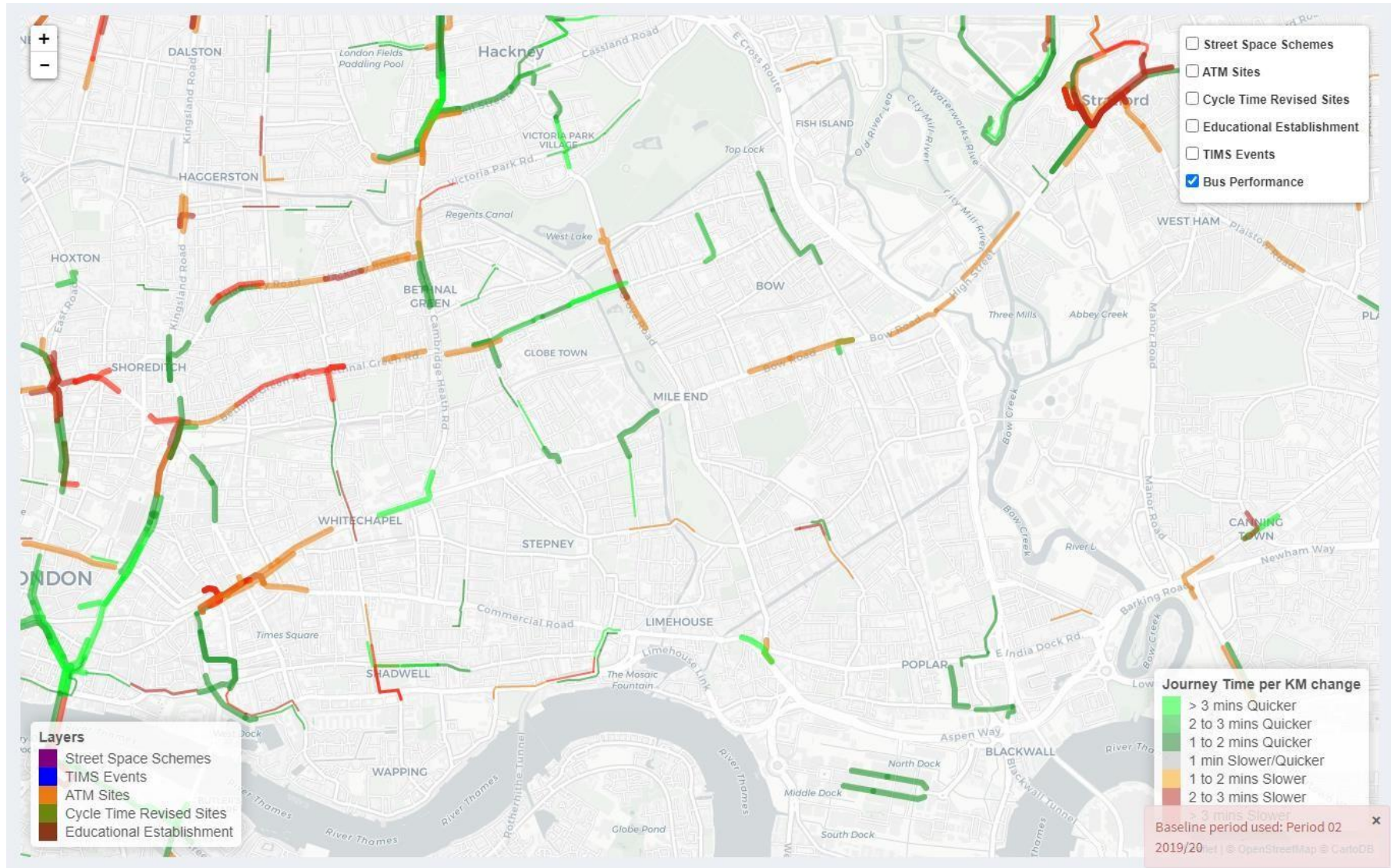
Tower Hamlets iBus Map. 1 May to 28 May 2021 compared with P2 2019/20 AM Peak (0700-1000)



Tower Hamlets iBus Map. 1 May to 28 May 2021 compared with P2 2019/20 Inter Peak (1000-1600)



Tower Hamlets iBus Map. 1 May to 28 May 2021 compared with P2 2019/20 PM Peak (1600-1900)



Part 5: Pre-scheme and post scheme collision data

Date from	Date to					
31/07/2018	31/01/2020					
Collision Date	Time	Casualty Mode of Travel	Casualty Severity	Casualty Age	Collision Location	Redacted Collision Description
Friday, January 11, 2019	12:15	Car	Slight	25	On Old Nichol Street, Near The Junction With Boundary Street E2.	On Friday 11 January 2019 At 12:15 A Collision Occured On Old Nichol Street, Near The Junction With Boundary Street E2. In Tower Hamlets Involving Two Cars
Monday, April 08, 2019	21:30	Car	Slight	27	On Barnet Grove, Near The Junction With Gossett Street, London.	On Monday 8 April 2019 At 21:30 A Collision Occured On Barnet Grove, Near The Junction With Gossett Street, London. In Tower Hamlets Involving One Car And One Pedal Cycle
Wednesday, April 03, 2019	16:30	Car	Slight	23	On Pollard Street, E2, 25 Metres North Of The Junction With Florida Street.	On Wednesday 3 April 2019 At 16:30 A Collision Occured On Pollaroad Street, E2, 25 Metres North Of The Junction With Florida Street. In Tower Hamlets Involving Two Cars
Tuesday, December 24, 2019	14:30	Car	Slight	54	On Rushmead, Near The Junction With Florida Street.	On Tuesday 24 December 2019 At 14:30 A Collision Occured On Rushmead, Near The Junction With Florida Street. In Tower Hamlets Involving Two Cars
Tuesday, November 20, 2018	08:40	Pedal Cycle	Slight	32	Virginia Road J/W Austin Street	Not Known How Collision Occurred
Thursday, January 02, 2020	17:28	Pedal Cycle	Slight	31	On Redchurch Street, Near The Junction With Club Row.	On Thursday 2 January 2020 At 17:28 A Collision Occured On Redchurch Street, Near The Junction With Club Row. In Tower Hamlets Involving One Car And One Pedal Cycle
Thursday, May 16, 2019	23:15	Pedal Cycle	Serious	34	On Columbia Road, Near The Junction With Chambord Street .	Apparently Vehicle 1 Was Travelling East Along Columbia Road E2 And Approached The Junction With Chambord Street E2. The Vehicle Went To Turn Right And Has Cut The Corner Too Sharply. The Driver Of Vehicle 1 Has Failed To Look Properly And Has Subsequently Not Seen The Cyclist Who Was Travelling North On Chambord Street E2 And Also Approaching The Junction. Vehicle 1 Has Then Hit The Cyclist At The Front Of The Car Causing The Cyclist To Fall Off His Bicycle And Hit The Road. Vehicle 1 Has Then Pulled Over To The Ide Of The Road And The Driver Has Exited The Vehicle And Gone Over To The Cyclist To Assist Him.
Tuesday, August 06, 2019	15:02	Pedal Cycle	Slight	49	On Columbia Road, Near The Junction With Gosset Street.	On Tuesday 6 August 2019 At 15:02 A Collision Occured On Columbia Road, Near The Junction With Gosset Street. In Tower Hamlets Involving One Pedal Cycle And One Van / Goods Vehicle 3.5 Tonnes Maximum Gross Weight (Mgw) And Under

Friday, March 15, 2019	23:52	Pedal Cycle	Slight	20	On Ezra Street, Near The Junction With Columbia Road.	On Friday 15 March 2019 At 23:52 A Collision Occured On Ezra Street, Near The Junction With Columbia Road. In Tower Hamlets Involving One Car And One Pedal Cycle
Tuesday, November 26, 2019	12:00	Pedal Cycle	Slight	36	On Gosset Street, Near The Junction With Turinstreet.	On Tuesday 26 November 2019 At 12:00 A Collision Occured On Gosset Street, Near The Junction With Turinstreet. In Tower Hamlets Involving One Car And One Pedal Cycle
Tuesday, January 28, 2020	03:40	Pedal Cycle	Slight	23	On Columbia Road, Near The Junction With Shipton Street.	On Tuesday 28 January 2020 At 03:40 A Collision Occured On Columbia Road, Near The Junction With Shipton Street. In Tower Hamlets Involving One Car And One Pedal Cycle
Saturday, May 11, 2019	19:16	Pedal Cycle	Slight	34	On Columbia Road, Near The Junction With Ropely Street, London.	On Saturday 11 May 2019 At 19:16 A Collision Occured On Columbia Road, Near The Junction With Ropely Street, London. In Tower Hamlets Involving One Car And One Pedal Cycle
Tuesday, July 23, 2019	17:15	Pedal Cycle	Slight	39	On Columbia Road, Near The Junction With Ropley Street.	On Tuesday 23 July 2019 At 17:15 A Collision Occured On Columbia Road, Near The Junction With Ropley Street. In Tower Hamlets Involving One Goods Vehicle - Unknown Weight And One Pedal Cycle
Monday, April 08, 2019	21:30	Pedal Cycle	Slight	36	On Barnet Grove, Near The Junction With Gossett Street, London.	On Monday 8 April 2019 At 21:30 A Collision Occured On Barnet Grove, Near The Junction With Gossett Street, London. In Tower Hamlets Involving One Car And One Pedal Cycle
Wednesday, December 11, 2019	08:30	Pedal Cycle	Slight	48	On Gosset Street, Near The Junction With Squirries St.	On Wednesday 11 December 2019 At 08:30 A Collision Occured On Gosset Street, Near The Junction With Squirries St. In Tower Hamlets Involving One Minibus (8 - 16 Passenger Seats) And One Pedal Cycle
Sunday, January 12, 2020	12:50	Pedal Cycle	Slight	25	On Old Bethnal Green Road, Near The Junction With Temple Street, E2.	On Sunday 12 January 2020 At 12:50 A Collision Occured On Old Bethnal Green Road, Near The Junction With Temple Street, E2. In Tower Hamlets Involving One Car And One Pedal Cycle
Monday, April 01, 2019	09:00	Pedestrian	Slight	15	On Pollard Street, 30 Metres North Of The Junction With Florida Street.	On Monday 1 April 2019 At 09:00 A Collision Occured On Pollaroad Street, 30 Metres North Of The Junction With Florida Street. In Tower Hamlets Involving One Car And Pedestrian(S)
Friday, November 22, 2019	15:20	Pedestrian	Slight	14	On Teesdale Street, Near The Junction With Old Bethnal Green Road, E2.	On Friday 22 November 2019 At 15:20 A Collision Occured On Teesdale Street, Near The Junction With Old Bethnal Green Road, E2. In Tower Hamlets Involving One Taxi / Private Hire Car And Pedestrian(S)
Monday, October 08, 2018	08:00	Pedestrian	Slight	26	O/S Hector House 30M N Of J/W Old Bethnal Green Road	Not Known How Collision Occurred
Wednesday, October 10, 2018	15:25	Pedestrian	Slight	34	Clare Street 100M N Of J/W Old Bethnal Green Road	Not Known How Collision Occurred
Friday, October 25, 2019	18:00	Powered 2 Wheeler	Slight	35	On Gosset Street, Near The Junction With Delta Street.	On Friday 25 October 2019 At 18:00 A Collision Occured On Gosset Street, Near The Junction With Delta Street. In Tower Hamlets Involving One Car And One Motorcycle Over 50Cc And Up To 125Cc

Wednesday, December 18, 2019	11:36	Powered 2 Wheeler	Slight	24	On Barnet Grove, Near The Junction With Gosset Street.	On Wednesday 18 December 2019 At 11:36 A Collision Occured On Barnet Grove, Near The Junction With Gosset Street. In Tower Hamlets Involving One Motorcycle Over 50Cc And Up To 125Cc And One Van / Goods Vehicle 3.5 Tonnes Maximum Gross Weight (Mgw) And Under
Sunday, February 03, 2019	10:20	Powered 2 Wheeler	Slight	32	On Gosset Street, Near The Junction With Walner Place.	On Sunday 3 February 2019 At 10:20 A Collision Occured On Gosset Street, Near The Junction With Walner Place. In Tower Hamlets Involving Two Motorcycle Over 50Cc And Up To 125Ccs
Saturday, September 15, 2018	09:30	Powered 2 Wheeler	Slight	33	Clare Street J/W Esker Place	Not Known How Collision Occurred

Date from	Date to						
31/07/2021	31/01/2023						
Pass Collision Date	Time	Casualty Mode of Travel	Casualty Severity	Casualty Age	Collision Location	Redacted Collision Description	
Thursday, September 22, 2022	14:30	Car	Slight		On Turin Street, Near The Junction With Benn House.	On Thursday 22 September 2022 At 14:30 A Collision Occured On Turin Street, Near The Junction With Benn House. In Tower Hamlets Involving Two Cars	
Thursday, September 22, 2022	14:30	Car	Slight	46	On Turin Street, Near The Junction With Benn House.	On Thursday 22 September 2022 At 14:30 A Collision Occured On Turin Street, Near The Junction With Benn House. In Tower Hamlets Involving Two Cars	
Friday, August 05, 2022	12:07	Car	Slight	34	On Squirries Street, Near The Junction With Florida Street.	On Friday 5 August 2022 At 12:07 A Collision Occured On Squirries Street, Near The Junction With Florida Street. In Tower Hamlets Involving One Car And One Van / Goods Vehicle 3.5 Tonnes Maximum Gross Weight (Mgw) And Under	
Friday, August 05, 2022	12:07	Car	Slight	68	On Squirries Street, Near The Junction With Florida Street.	On Friday 5 August 2022 At 12:07 A Collision Occured On Squirries Street, Near The Junction With Florida Street. In Tower Hamlets Involving One Car And One Van / Goods Vehicle 3.5 Tonnes Maximum Gross Weight (Mgw) And Under	
Thursday, May 26, 2022	11:37	Car	Slight	37	On Rushmead, Near The Junction With Bethnal Green Road.	On Thursday 26 May 2022 At 11:37 A Collision Occured On Rushmead, Near The Junction With Bethnal Green Road. In Tower Hamlets Involving One Car And One Goods Vehicle - Unknown Weight	

Wednesday, December 21, 2022	23:24	Car	Slight	24	On Temple Street, E2, 20 Metres South Of The Junction With Hackney Road, E2.	On Wednesday 21 December 2022 At 23:24 A Collision Occured On Temple Street, E2, 20 Metres South Of The Junction With Hackney Road, E2. In Tower Hamlets Involving One Van / Goods Vehicle 3.5 Tonnes Maximum Gross Weight (Mgw) And Under And Nine Cars
Thursday, January 20, 2022	09:20	Car	Slight	58	On Cambridge Crescent, 54 Metres North Of The Junction With Cambridge Crescent.	On Thursday 20 January 2022 At 09:20 A Collision Occured On Cambridge Crescent, 54 Metres North Of The Junction With Cambridge Crescent. In Tower Hamlets Involving One Car And One Pedal Cycle
Monday, July 11, 2022	07:25	Pedal Cycle	Slight		On Redchurch Street, Near The Junction With Bethnal Green Road.	On Monday 11 July 2022 At 07:25 A Collision Occured On Redchurch Street, Near The Junction With Bethnal Green Road. In Tower Hamlets Involving One Car And One Pedal Cycle
Friday, September 10, 2021	08:45	Pedal Cycle	Slight	32	On Barnet Grove, Near The Junction With Gosset Street, London.	On Friday 10 September 2021 At 08:45 A Collision Occured On Barnet Grove, Near The Junction With Gosset Street, London. In Tower Hamlets Involving One Car And One Pedal Cycle
Tuesday, September 07, 2021	07:30	Pedal Cycle	Slight	36	On Gossett Street, Near The Junction With Squirries Street, E2.	On Tuesday 7 September 2021 At 07:30 A Collision Occured On Gossett Street, Near The Junction With Squirries Street, E2. In Tower Hamlets Involving One Pedal Cycle And One Taxi / Private Hire Car
Monday, September 27, 2021	21:00	Pedal Cycle	Slight	21	On Old Bethnal Green Road, Near The Junction With Mansford Road.	On Monday 27 September 2021 At 21:00 A Collision Occured On Old Bethnal Green Road, Near The Junction With Mansford Road. In Tower Hamlets Involving One Car And One Pedal Cycle
Tuesday, January 11, 2022	20:02	Pedal Cycle	Slight	25	On Old Bethnal Green Road, Near The Junction With Mansford Road.	On Tuesday 11 January 2022 At 20:02 A Collision Occured On Old Bethnal Green Road, Near The Junction With Mansford Road. In Tower Hamlets Involving One Car And One Pedal Cycle
Tuesday, September 27, 2022	16:30	Pedal Cycle	Slight	30	On Old Bethnal Green Road, Near The Junction With Mansford Road.	On Tuesday 27 September 2022 At 16:30 A Collision Occured On Old Bethnal Green Road, Near The Junction With Mansford Road. In Tower Hamlets Involving One Car And One Pedal Cycle
Wednesday, September 15, 2021	14:30	Pedal Cycle	Slight	36	Location Uncertain Rushmead Jw Florida Street	On Wednesday 15 September 2021 At 14:30 A Collision Occured On Location Uncertain Rushmead Jw Florida Street In Tower Hamlets Involving One Car And One Pedal Cycle

Friday, January 13, 2023	20:15	Pedal Cycle	Slight	28	On Canrobert Street, 92 Metres Junction With Clarkson Street .	On Friday 13 January 2023 At 20:15 A Collision Occured On Canrobert Street, 92 Metres Junction With Clarkson Street In Tower Hamlets Involving Two Pedal Cycles
Thursday, January 20, 2022	09:20	Pedal Cycle	Slight		On Cambridge Crescent, 54 Metres North Of The Junction With Cambridge Crescent.	On Thursday 20 January 2022 At 09:20 A Collision Occured On Cambridge Crescent, 54 Metres North Of The Junction With Cambridge Crescent. In Tower Hamlets Involving One Car And One Pedal Cycle
Thursday, September 15, 2022	13:05	Pedal Cycle	Slight	35	On Old Bethnal Green Road, Near The Junction With Clarkson Street, London.	On Thursday 15 September 2022 At 13:05 A Collision Occured On Old Bethnal Green Road, Near The Junction With Clarkson Street, London. In Tower Hamlets Involving One Car And One Pedal Cycle
Monday, January 17, 2022	08:50	Pedal Cycle	Slight	36	On Old Bethnal Green Road, Near The Junction With St Judes Way.	On Monday 17 January 2022 At 08:50 A Collision Occured On Old Bethnal Green Road, Near The Junction With St Judes Way. In Tower Hamlets Involving One Car And One Pedal Cycle
Friday, October 22, 2021	00:30	Pedestrian	Slight	20	On Austin Street, Near The Junction With Boundary Street.	On Friday 22 October 2021 At 00:30 A Collision Occured On Austin Street, Near The Junction With Boundary Street. In Tower Hamlets Involving One Motorcycle - Unknown Cc And Pedestrian(S)
Saturday, October 29, 2022	14:10	Pedestrian	Slight	38	On Columbia Road, Near The Junction With Ezra Street.	On Saturday 29 October 2022 At 14:10 A Collision Occured On Columbia Road, Near The Junction With Ezra Street. In Tower Hamlets Involving One Car And Pedestrian(S)
Thursday, August 05, 2021	13:00	Powered 2 Wheeler	Slight	17	On Swanfield Street, Near The Junction With Rhoda Street, London.	On Thursday 5 August 2021 At 13:00 A Collision Occured On Swanfield Street, Near The Junction With Rhoda Street, London. In Tower Hamlets Involving One Motorcycle Over 50Cc And Up To 125Cc And One Van / Goods Vehicle 3.5 Tonnes Maximum Gross Weight (Mgw) And Under
Monday, December 20, 2021	06:55	Powered 2 Wheeler	Serious	60	On Bethnal Green Road, Near The Junction With Pollard Row.	On Monday 20 December 2021 At 06:55 A Collision Occured On Bethnal Green Road, Near The Junction With Pollard Row. In Tower Hamlets Involving One Car And One Motorcycle Over 125Cc And Up To 500Cc
Monday, August 02, 2021	15:40	Powered 2 Wheeler	Slight		On Clare Street, 50 Metres Junction With Hackney Road	On Monday 2 August 2021 At 15:40 A Collision Occured On Clare Street, 50 Metres Junction With Hackney Road In Tower Hamlets Involving One Car And One Motorcycle Over 50Cc And Up To 125Cc

Part 5: Pre-scheme and post scheme air pollution data

NO2 Diffusion Tube Data 2019-2022 from LBTH monitoring sites

Liveable Streets location	Bias Adjusted Average 2019	Annualised & Bias Adjusted Average 2022	Change
Parmiter St/ Cambridge Heath Road	40.87	31.7	-22.44%
Warner Place/Hackney Rd	35.44	26.7	-24.66%
Squirries St/Gosset St	37.55	26.2	-30.23%
Paradise Row/Bethnal Green Rd	36.01	29.4	-18.36%
Colombia Rd/Gossett Street	32.74	23.4	-28.53%
Calvert Ave/Boundary Street	34.66	25.9	-25.27%
Buckfast St/Bethnal Green Rd	32.48	23.8	-26.72%

Control cases	Bias Adjusted Average 2019	Annualised & Bias Adjusted Average 2022	Change
St Stephen's Rd/Tredegar Rd	38.66	30.73	-20.51%
Whitechapel Rd/Adler St	40.33	30.75	-23.75%

Data for 2022 is only for part of the year and so it has been annualised to be representative of the whole year using approved method.

Part 6: Old Bethnal Green Road pedestrian count data

Time	Pedestrian flows
07:00-07:30	78
07:30-08:00	129
08:00-08:30	368
08:30-09:00	625
09:00-09:30	170
09:30-10:00	129
10:00-10:30	134
10:30-11:00	153
11:00-11:30	129
11:30-12:00	187
12:00-12:30	172
12:30-13:00	163
13:00-13:30	227
13:30-14:00	182
14:00-14:30	160
14:30-15:00	159
15:00-15:30	415
15:30-16:00	623
16:00-16:30	199
16:30-17:00	186
17:00-17:30	195
17:30-18:00	233
18:00-18:30	219
18:30-19:00	185

Part 7: Scheme area cycle count data

		Squirries St (Junction with Ivemy St)		Gosset St (Junction with Squirries St)		Bethnal Green Rd (Canrobert St)		Hackney Rd (Temple St)		Old Bethnal Green Road (Junction with Canrobert St)		
TIME		Northbound	Southbound	Eastbound	Westbound	Eastbound	Westbound	Eastbound	Westbound	Eastbound	Westbound	TIME
07:00		2	4	4	7	4	23	3	9	4	6	07:00
07:15		8	8	5	9	4	25	5	13	4	5	07:15
07:30		7	12	5	12	5	24	4	22	4	12	07:30
07:45		10	19	6	20	5	36	6	17	3	15	07:45
H/TOT		26	42	19	48	17	108	17	61	14	38	H/TOT
08:00		10	14	7	22	8	37	5	24	6	18	08:00
08:15		10	20	7	28	10	46	7	39	6	26	08:15
08:30		9	23	9	35	12	70	8	52	8	25	08:30
08:45		17	29	15	37	14	62	10	55	12	26	08:45
H/TOT		46	86	37	122	43	215	30	168	32	94	H/TOT
17:00		14	9	14	9	25	23	23	14	12	9	17:00
17:15		19	13	21	12	36	23	21	11	14	8	17:15
17:30		22	11	20	13	45	19	30	12	14	12	17:30
17:45		25	13	17	21	54	35	44	18	20	14	17:45
H/TOT		79	45	71	54	159	99	117	54	59	42	H/TOT
18:00		21	17	23	19	44	29	33	15	20	11	18:00
18:15		26	16	23	18	60	33	39	19	20	13	18:15
18:30		34	14	26	16	55	30	38	21	20	13	18:30
18:45		20	18	26	14	50	32	34	14	18	10	18:45
H/TOT		101	64	97	66	208	123	143	68	77	47	H/TOT

	Squirries Street (Ivemy)		Gosset (squirries)		Bethnal Green Road (Canrobert)		Hackney Road (Temple Street)		OBGR (Canrobert)		
	Northbound	Southbound	Eastbound	Westbound	Eastbound	Westbound	Eastbound	Westbound	Eastbound	Westbound	
P/TOT	542	539	479	631	912	1164	620	739	391	482	P/TOT

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	Calvert Avenue B122		Hackney Road (Columbia Road)		Bethnal Green Road (Scalter St)		Columbia Road (Gosset)		
TIME	Eastbound	Westbound	Northbound	Southbound	Eastbound	Westbound	Eastbound	Westbound	TIME
07:00	1	2	4	24	6	21	6	13	07:00
07:15	3	4	2	48	7	31	5	35	07:15
07:30	3	4	7	55	3	31	4	49	07:30
07:45	1	3	6	59	8	36	7	68	07:45
H/TOT	8	12	18	185	23	118	21	165	H/TOT
08:00	4	3	7	68	11	43	3	76	08:00
08:15	4	5	8	89	7	67	13	109	08:15
08:30	5	13	14	114	12	76	10	139	08:30
08:45	4	15	16	139	16	73	13	139	08:45
H/TOT	17	35	44	409	44	259	38	462	H/TOT
17:00	3	6	48	17	29	21	48	14	17:00
17:15	7	6	53	27	47	11	68	16	17:15
17:30	9	7	63	26	59	19	67	16	17:30


17:45	7	4	72	27	67	34	79	12	17:45
H/TOT	26	22	236	96	202	84	261	57	H/TOT
18:00	4	11	69	25	64	34	87	22	18:00
18:15	6	9	71	36	66	36	72	23	18:15
18:30	7	10	78	28	59	40	81	20	18:30
18:45	6	9	61	33	62	28	64	25	18:45
H/TOT	22	37	279	122	250	137	304	89	H/TOT
P/TOT	197	252	1083	1580	1087	1289	1138	1510	P/TOT

Part 8: Hackney Road/Cambridge Heath Road turning count data

TIME	Car	Light Goods Vehicle	Goods vehicle with 2 or 3 axles	Goods vehicle with 4 or more axles	Bus/Coach	Motorcycle	Peddle Cycle	Total
06:00	5	2	1	0	0	0	1	9
06:15	9	1	1	0	0	0	0	10
06:30	9	4	2	0	0	0	1	16
06:45	6	3	0	0	0	0	0	9
6am-7am	28	9	4	0	0	0	2	43
07:00	7	2	0	0	0	0	1	10
07:15	14	4	0	0	0	0	1	19
07:30	13	4	1	0	0	0	2	19
07:45	7	8	1	0	0	1	2	17
7am-8am	40	17	2	0	0	1	5	64
08:00	15	4	1	1	0	2	0	21
08:15	10	3	1	0	1	1	3	17
08:30	17	3	1	0	2	1	2	25
08:45	20	4	2	0	0	1	2	28
8am-9am	60	12	4	1	3	4	6	90
09:00	17	3	1	0	0	1	3	24
09:15	14	6	1	0	0	1	2	23
09:30	21	8	2	1	0	1	1	32
09:45	14	8	2	1	1	1	4	29
9am-10am	65	23	5	2	1	4	9	107
10:00	14	3	1	0	0	1	2	20
10:15	19	6	1	0	1	1	3	30
10:30	15	3	1	0	0	2	1	22
10:45	13	6	1	0	0	1	0	20
10am-11am	61	17	4	0	1	5	5	91

11:00	18	4	1	0	0	2	1	26
11:15	12	4	0	1	0	1	1	18
11:30	19	10	1	0	0	0	2	32
11:45	14	3	1	0	0	1	2	20
11am-12pm	63	21	3	1	0	3	5	95
12:00	17	8	2	0	0	2	3	31
12:15	15	7	0	0	0	1	2	24
12:30	17	7	0	1	0	2	1	26
12:45	14	4	2	0	0	3	4	25
12pm-1pm	62	25	3	1	0	6	9	105
13:00	18	6	0	0	0	3	4	30
13:15	14	4	1	0	0	3	2	22
13:30	13	5	1	0	0	1	3	22
13:45	18	5	1	0	0	1	2	25
1pm-2pm	62	19	2	0	0	8	10	99
14:00	17	5	1	0	0	1	4	27
14:15	15	6	0	0	0	3	4	28
14:30	12	6	1	0	0	0	3	21
14:45	16	4	1	0	0	1	2	24
1pm-2pm	59	21	2	0	0	5	12	99
15:00	15	5	1	0	0	2	3	25
15:15	16	6	0	0	0	3	0	24
15:30	19	5	1	0	0	4	1	29
15:45	20	8	1	0	0	2	1	30
3pm-4pm	69	23	2	0	0	10	5	107
16:00	27	6	0	0	1	2	1	36
16:15	16	12	0	0	0	2	1	30
16:30	17	9	0	0	0	1	1	28

16:45	21	9	0	0	0	1	1	31
4pm-5pm	80	35	0	0	1	5	4	124
17:00	19	6	1	1	0	3	1	29
17:15	19	3	0	0	0	3	0	25
17:30	12	4	1	1	0	2	2	20
17:45	20	2	0	0	0	3	5	29
5pm-6pm	68	15	2	1	0	10	8	103
18:00	16	3	1	0	0	1	4	24
18:15	23	2	0	0	0	3	6	33
18:30	20	3	1	0	0	4	2	28
18:45	23	5	0	0	0	2	5	34
6pm-7pm	82	12	1	0	0	9	16	119
19:00	23	1	0	0	0	4	6	33
19:15	16	2	0	0	1	3	2	22
19:30	17	3	1	0	0	3	3	26
19:45	15	3	1	0	0	2	3	22
7pm-8pm	70	7	1	0	1	12	13	103
20:00	16	1	0	0	0	2	3	21
20:15	16	1	0	0	0	1	2	19
20:30	16	2	0	0	0	4	2	24
20:45	18	1	0	0	0	4	3	25
8pm-9pm	66	4	0	0	0	9	10	89
21:00	19	2	0	0	0	4	4	29
21:15	19	3	0	0	0	2	3	26
21:30	21	0	0	0	0	4	2	26
21:45	19	1	1	0	0	1	4	25
9pm-10pm	77	6	1	0	0	10	12	105
P/TOT	980	254	30	4	6	97	126	1496

Cabinet 20 September 2023	 TOWER HAMLETS
Report of: Simon Baxter – Interim Director Public Realm	Classification: Unrestricted
Liveable Streets Brick Lane Consultation outcome and measures	

Lead Member	Cllr Kabir Hussain, Cabinet Member for Environment and the Climate Emergency
Originating Officer(s)	Ashraf Ali, Service Head, Highways & Transportation (Interim)
Wards affected	Spitalfields and Banglatown and Weavers
Key Decision?	Yes
Forward Plan Notice Published	12/08/2022
Reason for Key Decision	Significant impact on wards
Strategic Plan Priority Outcome	7. Working towards a clean and green future

Executive Summary

On Wednesday 30 October 2019 Cabinet approved the Liveable Streets programme, governance and delivery plan for 17 project areas. Seven projects were started and two of there were completed (Wapping and Barkentine).

The Liveable Streets programme seeks to make fundamental improvements to the infrastructure on the street and open spaces and change the travel behaviour of residents, businesses and visitors to Tower Hamlets.

In early August 2021, the council implemented one of the schemes under the Brick Lane Liveable Streets Programme which was five timed closures to motor vehicles (5.30pm-11pm Thursday and Friday and 11am-11pm Saturday and Sunday) along Brick Lane. These included along Brick Lane between:

- Brick Lane between Chicksand Street and Fashion Street
- Brick Lane between Fournier Street and Princelet Street
- Brick Lane between Princelet Street and Hanbury Street
- Brick Lane between Hanbury Street and Woodseer Street
- Brick Lane between Buxton Street and Taylor’s Yard entrance

In March 2022, the council reduced the number of timed closures by removing the following the three southernmost closures. These were:

- Brick Lane between Chicksand Street and Fashion Street
- Brick Lane between Fournier Street and Princelet Street
- Brick Lane between Princelet Street and Hanbury Street

The council also reduced the timings of the two remaining closures between Hanbury Street and Woodseer Street and between Buxton Street and Taylor’s Yard entrance. The new timings were changed to 12pm-11pm Saturday and Sunday. These changes were implemented under an experimental order.

The council has reviewed the scheme through a public consultation and engagement with key stakeholders and local businesses. This report details the results of the review and feedback from engagement and presents the details of two options.

Recommendations:

For the reasons set out in this report, and having regard to the Council’s public sector equality duty The Mayor in Cabinet is recommended to:

1. Receive and conscientiously consider the results of the public consultation and engagement with businesses in the Brick Lane area.
2. To approve one of two options summarised in section 2 of this report.
3. Note that the Appendix C – Equalities Impact Assessment identifies a number of positive and negative impacts of the options upon individuals that share particular protected characteristics (summarised in paragraphs 4.1 – 4.3 of this report).

1 REASONS FOR THE DECISIONS

1.1 The options set out in this report seek to address several issues that have been identified by residents and key stakeholders since the implementation of the camera closures on Brick Lane.

2 ALTERNATIVE OPTIONS

2.1 Through the public consultation, responses and feedback from the public and key stakeholders was assessed by the project team. The review, assessment and available data have contributed to the development of additions to Option 1.

Summary of the options

2.2 Below is a summary of each of the options under consideration in this report.

Option 1

- The full removal of the camera closures on Brick Lane

- Commissioning of a comprehensive study into improving the public realm for pedestrians in the areas around Brick Lane

Option 2

- Retention of the camera closures.

3 DETAILS OF THE REPORT

Engagement and consultation

- 3.1 A public consultation exercise was carried out from 30 January until Sunday 17 February 2023. Consultation packs were delivered to 6525 residential and business addresses within the Brick Lane Liveable Streets scheme area, with extra copies available on request.
- 3.2 Both consultations presented respondents with two options as well as a travel survey and scheme evaluation. The options were:
- Option 1: The full removal of the camera closures on Brick Lane
 - Option 2: Retain the camera closures.
- 3.3 Emails were also sent to key stakeholders such as local schools, Transport for London and the emergency services. Emails were also sent to internal and external stakeholders on the Tower Hamlets mailing list during the consultation period.
- 3.4 Throughout the engagement period, we met with council departments and reached out to the emergency services and Transport for London.
- 3.5 The following groups were also asked to for their comments on the consultation:
- Accessible Transport Forum
 - Ethnic Minority Network
 - The Disabled People’s network
 - Interfaith Forum
 - LGBT+ Community Forum
 - Older People’s Reference Group
 - Women’s Network

Consultation responses

Analysis of data and feedback

Data

The council has collected data to assess the impacts of the Liveable Street programme in Bethnal Green. Collecting a baseline was not possible for some data sets making before and after comparisons impossible. This applies to

cycle and pedestrian count data that was not collected before the scheme was implemented. However, the council has collected a sufficient level of data for a robust assessment of the scheme to be undertaken. The following data has been collected:

- Air Quality (NOX)
- Responses from the public consultation and stakeholder feedback

The data collated after approximately 12 months of operation of the scheme is sufficient to enable the benefits and disbenefits to be properly evaluated and understood so that informed decisions can be taken.

Consultation Feedback

In addition, a full analysis has been undertaken on all feedback on the scheme regarding the scheme. This includes:

- A public consultation which was conducted from 30 January 2023 to 17 February 2023.
- External stakeholder engagement including but not limited to the emergency services, Transport for London and local businesses.
- Internal stakeholder feedback from council services including the network management, clean and green and highways maintenance teams

Analysis

Traffic volumes on boundary roads

- 3.6 The council could not obtain any traffic data that would enable the council to fully assess the impact of the closures on local roads as pre scheme weekend traffic data was for counts undertaken on weekdays.

Air quality

- 3.7 NO₂ data from within the scheme and boundary roads was collected and compared with similar roads and streets in other parts of the borough. The data showed significant reductions between 2019 and 2022 across the borough, including the area around Brick Lane.
- 3.8 Average NO₂ levels reduced by 23% on Whitechapel Road and 21% on Commercial Street compared to 20.93% for other comparable A roads in the Borough. The nearest monitoring station to the closures is Brick Lane/Princelet Street which saw a 23% reduction in NO₂ levels.

Consultation outcome

- 3.9 For those who used a resident reference code sent out with consultation packs across the scheme area, 41% (109) supported option 1 for and 59% (158) supported option 2.

3.10 The surveys also included a travel survey and scheme evaluation. Details regarding both is provided in Appendix B - Brick Lane Consultation Report. Based on the consultation responses received, overall the residents supported option 2.

Public consultation Feedback themes

3.11 Key themes from respondents supporting Option 1 included:

- Traffic is displaced onto local streets causing a nuisance to residents
- The confusing nature of the closures means people get fines and this results in customers avoiding the area through fear of receiving more fines.

3.12 Key themes from respondents supporting Option 2 include:

- The pedestrian space created through the closures make the area is pleasant to visit.
- It will be less safe to walk and cycle through the area is traffic is re-introduced at the busy times the closures are operational.
- The closures increase footfall and are better for local businesses.

Stakeholder feedback

3.13 The three emergency services were consulted on the proposals and summaries of their response are provided below.

3.14 *London Ambulance service response*

- Regarding the closures we would not have a preference on whether the scheme was removed or kept, as long as no hard physical closures are introduced that could impact on emergency access/egress.

Cameras – allow this, whilst maintaining a reduction in through traffic.

3.15 *Metropolitan Police response is set out below:*

- The MPS Road Safety Engineering Unit would urge LBTH to retain as much of the LTN infrastructure as possible in Brick Lane. This road is heavily used by vulnerable road users, especially pedestrians, who are most at risk of injury in collisions with motor vehicles. 80% of those killed on roads in London are vulnerable road users and reducing road deaths is part of the Mayor's Vision Zero strategy which we support. Due to the short period that the closures have been in place I am not able to source any meaningful collision data, but the removal/reduction of motor vehicles in other areas of London has shown a significant reduction in collisions.

3.16 LFB response:

- London Fire Brigade (LFB) wish to highlight the importance of our emergency service response being considered in all road network planning. LFB's Community Risk Management Plan (CRMP), which is approved by the Mayor of London, commits the Brigade to getting the first fire engine to an incident within a London wide average of six minutes and a second fire engine in eight minutes. We are keen to ensure the proposed changes do not impact on LFB's ability to meet those commitments. LFB has strict attendance times which are monitored closely. It is imperative that any works like this has minimal impact on our emergency response.

3.17 TFL response:

- Brick Lane is a vibrant cultural hub with high footfall, that attracts visitors from all over the world. Tower Hamlets Council has already responded to feedback from some local businesses about reducing the camera-enforced closures from five to two. The remaining timebound closures are essential for pedestrian safety and enhance the attractiveness of the area for visitors and residents alike – creating potential economic benefits.

The consultation materials present a weak rationale for removing the remaining two cameras, with a heavy focus on car reliance – which is neither supportive of resident and visitor safety or the economic interests of Brick Lane. Removing the remaining traffic restrictions is therefore not supported by TfL.

3.18 Tower Hamlets Council Public Health Team

- Public Health recognises the importance of improving the look and feel of public spaces in neighbourhoods across the borough, to make it easier, safer and more convenient to get around by foot, bike and public transport, as well as to take steps to reduce pollution.

Response from Tower Hamlets Network Management Team (Regulatory Function)

3.19 The role of the Network Management Group, apart from coordinating works and activities on the Council's highways, is also to hold the charge of the Traffic Manager whilst satisfying the Network Management duty which is a statutory responsibility.

3.20 The responsibility of the team is to request information and assess the proposed schemes and works that will have an impact on the resiliency of the network. The Network Manager needs to be satisfied that network resilience is maintained and that there is efficient and expeditious movement of traffic, as far as possible, on our road network.

The Network Management team would support the removal of Liveable Streets schemes across the borough. Returning to a baseline traffic configuration will immediately alleviate negative post scheme impacts. This will allow the council to review a more considerate approach in the future with assessment that really take all stakeholders/data/assessment concerns into account before moving forward. The implementation of Option 1 will improve the resilience.

Response from UK Power Networks (UKPN)

From a UKPN stance, we have raised numerous concerns about the LTNs that have come in across London. We are seeing concerns raised by Engineers who are being delayed from accessing assets such as Substations and Link Boxes due to the additional time it's taking to get to locations when having to detour or take a different route which are now heavier with displaced traffic.

One of our main focuses and drivers from Ofgem is restoration time to faults, we need to ensure we restore power to customers as quickly and as safely as we can – in some cases, as you know this could be a temporary measure, but this is usually carried out by switching the network via Link Boxes or local Substations, but requires Engineers on site to do so. Not being able to get to locations as swiftly as we previously could due to these LTNs has a knock on affect to our restoration times, which could also potentially put added risk to any scenario.

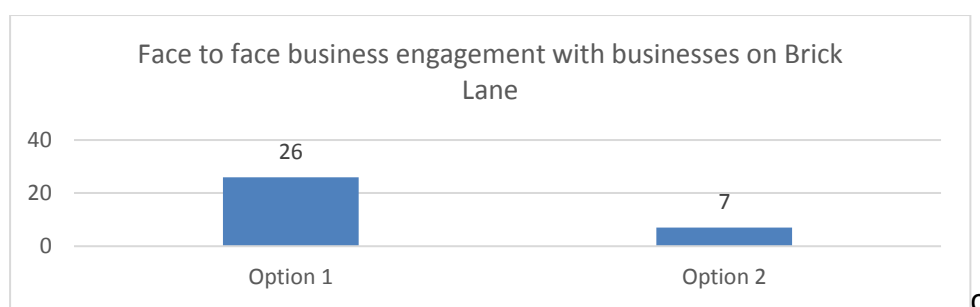
The Options

Option 1

- 3.21 Option 1, involves the removal of the two existing timed camera closures on Brick Lane.
- 3.22 The closures restrict traffic from two sections of Brick Lane, measuring 49m between Hanbury Street and 43m between Buxton Street and the entrance to Taylor's Yard. During closure times, vehicle access is still possible to the part of Brick Lane which sits between these two restricted areas. This area provides access to the Truman Brewery public car park, the wider Truman Brewery site and access and other uses such as taxis serving the night-time economy in the area. This section is only accessible through Spital Street, Hanbury Street and then Woodseer Street.
- 3.23 Woodseer Street is narrow and has limited footway space on each side with larger vehicles occasionally mounting the northern footway to pass parked vehicles. Spital Street and Hanbury Street both border dense residential estates including the Chicksand Estate.
- 3.24 This option would address the issue of displaced traffic onto surrounding residential streets during closures times. This will result in reduced road

danger in these dense residential areas. Traffic has a disproportionate impact on protected characteristics groups such as older people and younger children who are more likely to use these residential side streets.

- 3.25 Brick Lane is also home to a high concentration of business, many of which form the frontage along Brick Lane. Business types are largely mixed but there is a high concentration of restaurants between Fournier Street and Woodseer Street.
- 3.26 The consultation asked respondents whether they were responding as a business or owner of a business in the area where 18 respondents from the consultation area answered yes to this question (6.3% of all respondents in the consultation area). The majority of business responders (52%) within the consultation area felt that the scheme has had a negative impact on their business.
- 3.27 Further face to face engagement with local businesses was conducted and 26 out of 33 businesses we engaged with supported Option 1 (removal of the camera closures).



- 3.28 The responses from local businesses stated the following concerns with the closures:
- How the closures have reduced the number of those who drive to Brick Lane
 - The impact of closures on deliveries. Closures divert traffic down longer routes leading to more traffic congestion; adversely affects vehicle access to business / deliveries;
- 3.29 Option 1 would introduce some through traffic between two major A Roads (Whitechapel High Street and Bethnal Green Road) so traffic levels are likely to increase on the weekends. Under Option 1, the council will commission a comprehensive study into improving the public realm for pedestrians in the areas around Brick Lane. It should consider walking routes throughout the area and should also consider parking arrangements on Brick Lane and how they impact on pedestrian use of Brick Lane. Key priorities will be:
- Working with TfL to address the key road safety issue the area, the Commercial Street/Hanbury Street junction. The junction is busy seven days a week and is part of the key route between Spitalfields Market and Brick Lane. However, there are no green signals for pedestrians who

can only cross when there are gaps in traffic. This is a particular issue for older pedestrians, children and disabled users.

- The level of service that is provided to pedestrians along the whole of Brick Lane.
- An assessment of parking arrangements on and around Brick Lane and how they can coordinate better to accommodate the pedestrian demands.
- There need to be an assessment of pedestrian links to Brick Lane. Many of these links need improvements including footway widening and decluttering.

Option 2

- 3.30 Brick Lane is one the London's key tourist destinations, attracting thousands of visitors throughout the week but at much higher levels at weekends.
- 3.31 The section of Brick Lane covered by the two camera closures is well used by thousands of pedestrians. The sections of Brick Lane closed to traffic benefit these pedestrians by providing safe traffic free space. The pedestrianised road space on Brick Lane is well used particularly where footway widths are limited.⁹
- 3.32 The camera closures provide an added benefit to the non-pedestrianised parts of Brick Lane by restricting through traffic between Whitechapel High Street and Bethnal Green Road.
- 3.33 TfL raised concerns stating the closures are essential for pedestrian safety and feel the removal of the closures is neither supportive of resident and visitor safety or the economic interests of Brick Lane. The Metropolitan Police Service response also raises the concerns on pedestrian safety.
- 3.34 The camera closures do not impact on council operations such as highways maintenance, waste collection and passenger services through exemption or their timing in the weekends.
- 3.35 Air quality has improved to a slightly greater degree on Brick Lane compared to similar roads in the borough (a reduction of 23% from 2019 to 2022). However, it is difficult to ascertain the contribution of the closures to this reduction given they have only been in place since August 2021 and are limited to weekend operation.

4 EQUALITIES IMPLICATION

- 4.1 An Equalities Impact Assessment (EqIA) has been developed alongside the scheme development and consultation process. The initial EqIA assessment highlighted the potential for positive and negative impacts on groups sharing protected characteristics. Evidence has been gathered from existing studies, data sets, as well as data collected as part of the consultation.

- 4.2 Overall, Option 1 would benefit road safety for some residential streets surrounding Brick Lane. Traffic in these areas is more likely to impact older pedestrians, children and disabled users.

5 OTHER STATUTORY IMPLICATIONS

- 5.1 Option 1 would require changes to traffic regulation orders will need to be advertised and made. These will be advertised and consulted on in accordance with the Local Authorities' Traffic Orders (Procedures) (England and Wales) Regulations 1996.

6 COMMENTS OF THE CHIEF FINANCE OFFICER

- 6.1 The cameras on Brick Lane were introduced in January 2022 as part of the liveable streets programme. Since this date, PCNs to the value of £1.502m have been issued directly relating to these cameras, with £1.3m in 2022/23. Removal of the cameras will result in an annual reduction in this income.
- 6.2 It is proposed that this will be fully mitigated by a combination of relocation of cameras to other locations in the borough, and additional enforcement hours.

7 COMMENTS OF LEGAL SERVICES

- 7.1 It is understood that the Brick Lane scheme is currently subject to a permanent order, although the operating times when the closure is in force were varied by an Experimental Traffic Order in March 2022.
- 7.2 If this is the case, and Option 2 is preferred, officers will need to ensure that appropriate steps are in place to ensure the Experimental Traffic Order will remain in force on the expiry of that Order.
- 7.3 If Option 1 is preferred, it has been identified that this will require a new Traffic Order to be made.
- 7.4 The power to make (or not to make) an order is discretionary - simply because there may have been a particularly active campaign (either for or against a proposal) does not automatically mean that option should be followed. The test against which any decision will be considered is whether the decision to make or not make an order was so unreasonable that no reasonable person acting reasonably could have made it.
- 7.5 The Road Traffic Regulation Act 1984 provides the statutory basis on which traffic orders may be made -
- Avoiding danger to people or traffic
 - Preventing damage to the road or to buildings on or near the road
 - Facilitating the passage of traffic (including pedestrians)
 - Preventing the use of the road by unsuitable traffic

- Preserving the character of the road, especially where the road is suitable for walking or horse-riding
- Preserving or improving the amenities of the area through which the road runs
- Air quality

- 7.6 The courts have recently set out how a decision maker should react when considering whether respond or not to make a traffic order –
- keep in mind the statutory duty under s122 Road Traffic Regulation Act 1984 to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians), so far as practicable.
 - have regard to factors which might point in favour of making the order – these factors include the effect on local amenities and all the relevant factors listed in s1 Road Traffic Regulation Act 1984.
 - balance the various considerations and make the appropriate decision

- 7.7 When considering whether to make or revoke a traffic order, the decision maker must consider wider statutory duties. These include –
- Exercising our powers under s122 Road Traffic Regulation Act 1984 to secure so far as practicable the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians).
 - Any duties under the Traffic Management Act 2004 to secure the expeditious movement of traffic on the local traffic network.
 - Equalities – detailed in the body of the report

- 7.8 Consultation has been undertaken, including with the public. The feedback from that consultation is but one element of the balancing exercise required to be carried out in the decision-making process.

Linked Reports, Appendices and Background Documents

Linked Report

- NONE

Appendices

Appendix A – Consultation Document

Appendix B - Brick Lane Consultation Report

Appendix C – Brick Lane Equalities Impact Assessment

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

- NONE

Officer contact details for documents:

Ashraf Ali – Head of Highways and Transportation

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A Better Brick Lane

Public consultation
on changes to traffic
restrictions on Brick Lane

Page 311



Mayor's Foreword

The transport network is a vital part of everyday life. It enables people to make their regular journeys to and from home for work, study, leisure, socialising or shopping and provides essential means of access to healthcare and welfare services. Businesses rely on transport to bring employees and customers to their premises and convey their goods and services. It enables family to travel to vulnerable relatives and provide a network of community and support. An efficient and sustainable transport system is vital for addressing issues relating to public health, air quality, accessibility and growth.

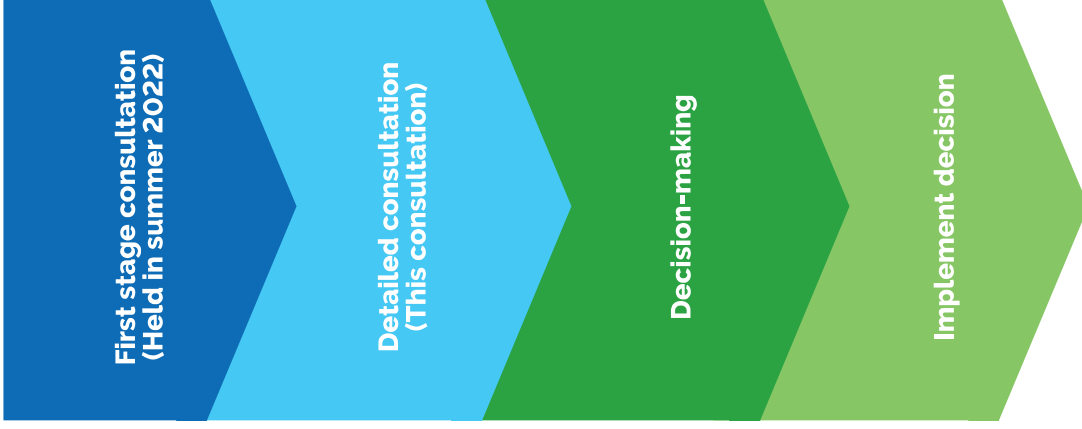
When the Liveable Streets scheme was first implemented in Brick Lane, concerns were raised around the impact on local businesses and access for residents. Now that the scheme is in place, we have received strong feedback from residents and stakeholders reporting adverse impacts

from the scheme, particularly on business and trade. This feedback has allowed us to develop our proposals further.

I am pleased to present this document which is the next stage in consulting on our proposals. Our key objective is to create healthier streets, with improvements to accessibility and road safety, while restoring access for businesses who rely on Brick Lane to bring employees and customers to their premises and convey their goods and services. All residents and other stakeholders are encouraged to have their say and respond to this consultation and help us shape our proposals.



Mayor Lutfur Rahman



This consultation

We are consulting on whether to remove the weekend camera closures on Brick Lane. This proposal has been developed following feedback from residents and engagement with local businesses. This is set out in more detail in this document.

Structure of this document

Part 1 Introduction to the current scheme

Part 2 The Options

Part 3 The Data

Part 4 Guidance on responding to this consultation

Part 1: Introduction to the current scheme

The Liveable Streets closures on Brick Lane. These currently operate at the following times and locations.

- Hanbury Street to Woodseer Street from 12pm-11pm on Saturdays and Sundays.
- Buxton Street to Taylor's Yard entrance from 11am-11pm on Saturdays and 8am-11pm on Sundays.

The scheme is implemented as an experimental traffic order following the reduction of cameras closures on Brick Lane in March 2022. This order involved the reduction in camera closures on Brick Lane to from five to two. This change was due to significant opposition to the closures from local businesses.



Camera closure locations

Part 2: The Options

The council has undertaken an evaluation of the closures by gathering and analysing data from various sources and feedback from the first-round consultation (see Appendix).

We have set out two options to consider. Option 1 is for removal of the two camera closures on Option 2 is for retaining them.

Option 1: The full removal of the camera closures on Brick Lane
Feedback from that first stage consultation, shows strong feedback from residents and businesses supporting the removal of the closures. Key themes were displaced traffic, increased journey times for those dependent on the use of a car and impact on Businesses.

Increased journey times
Responses in the first stage consultation showed concerns around the increased journey times. This disproportionately impacts on residents who rely on the use of motor vehicles.

Impact on businesses
Initial engagement with businesses showed that many felt the closures were adversely impacting on their trade. In this stage of the consultation, we will undertake more detail engagement with businesses to gain a better understanding of the issues they are experiencing.

Sunday Market closure
Option 1 would not impact on the existing Sunday market restrictions that operate on Brick Lane north of Hanbury Street from 8am to 4pm. These restrictions would remain.

Option 2: Retaining the camera closures
Feedback from the first stage of the consultation showed support for the benefits of the closures. The key benefit is the improvement to safety for pedestrians through the removal of traffic during closure times.



Section of brick lane north of Hanbury Street closed to traffic

The closures apply to two parts of Brick Lane which experience significant pedestrian demand during the closure times over the weekend. This is primarily due to increased activity in and around the Truman Brewery and movement between Brick Lane and Spitalfields to the west. Traffic movements are still possible inbetween the two pedestrianised spaces through a diversion using Woodseer Street.



Area closed to traffic during closure times

Route open to traffic during closure times

Traffic movements during closure times

Part 3: The Data

This part of the consultation sets out the data which will allow residents and stakeholders to consider the options. It includes:

- Data gathered directly by the council
- Feedback from stakeholders

Air Quality Data

Air pollution is associated with several adverse health impacts; it is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions.

The UK Clean Air Strategy released in 2019, provides the overarching strategic framework for air quality management in the UK and contains national air quality standards and objectives established by the government to protect human health.

The strategy objectives take into account EU directives that set limit values which member states are legally required to achieve by their target dates. UK legal limits for nitrogen dioxide (NO₂) are 40ug/m³ (micrograms per cubic metre) annual mean. NO₂ data from within the scheme and boundary roads was collected and compared with similar roads and streets in other parts of the borough. The data

showed significant reductions between 2019 and 2022 across the borough, including the area around Brick Lane.

Improved air quality across the area

Average NO₂ levels reduced by 23% on Whitechapel Road and 21% on Commercial Street compared to 20.93% for other comparable A roads in the Borough. The nearest monitoring station to the closures is Brick Lane/Princelet Street which saw a 23% reduction in NO₂ levels.

Conclusions

The data is therefore inconclusive as to whether the introduction of the closures on Brick Lane has had a significant impact on air quality levels. Comparing local air quality data with the rest of the borough, there is an indication that most of the reductions in NO₂ emissions are due to ULEZ and cleaner vehicles as significant reductions have also occurred elsewhere in the borough.

Reductions in NO₂ across the borough should address concerns around the impact on air quality resulting from the removal of closures.

Boundary road traffic data Travel time delay data

Department of Transport data¹ has been gathered on the delay times for the main boundary road for of the scheme, Commercial Street. The data shows a 21% decrease in delays from 2019 to 2021. These are the main roads that would be expected to see diverted traffic during the closure times on Brick Lane.

Road Name(s)	2019	2022	Change	2019- 2022 percentage change
Whitechapel High St. (KFC)	47.8	39.6	-8.2	-17%
Whitechapel Rd./Adler St	40.3	30.9	-9.4	-23%
Brick Lane/Princelet St	32.2	24.9	-7.3	-23%
Toynbee St/Commercial St	45.1	35.7	-9.4	-21%

Changes in NO₂ levels in the scheme area (2019-2022)

Road Name(s)	Average delay (second per vehicle per mile)			Change on 2019
	2019	2020	2021	
Commercial Street	275.7	219.9	215.6	-21.80%
Hackney Road	136.0	207.1	218.7	60.81%
Bethnal Green Road	164.0	156.5	186.1	13.48%
Whitechapel Road/ Bow Road	155.0	137.8	169.7	9.48%
Commercial Road	158.0	179.0	167.6	6.08%
Cambridge Heath Road	172.9	165.4	171.1	-1.04%

1: <https://www.gov.uk/government/statistical-data-sets/average-speed-delay-and-reliability-of-travel-times-cgn>

Part 4: Guide to responding to this consultation

A paper survey has been sent with this document as part of this consultation. Your views are important to us and we want everyone to have their say.

Using your response reference number

All paper surveys sent out to residents within the consultation boundary will have a response reference code. These are to be used for online responses if that is your chosen method of response. This code is for the household and can be used for responses from each member of the household.

Page 3 of 6

Please provide your feedback by

11.59pm on Sunday 19th February 2023.

Visit our website talk.towerhamlets.gov.uk/LSBricklane for more information on the plans

Have your say by contributing by:

1

Paper survey (sent with this leaflet) sent via post in the freepost envelope provided.

2

Online via talk.towerhamlets.gov.uk/LSBricklane. The online survey is open for all to respond to. Residents and businesses who have received a paper copy of the survey should use the response reference code on the survey.

Appendix : How you responded to the Brick Lane first stage consultation

First round public consultation results
 The public consultation was conducted between Wednesday 6th July and Sunday 7th August 2022. A public online/paper survey was launched on Wednesday 6th July 2022. Consultation packs were delivered to 6525 residential and business addresses within the consultation area shown below.

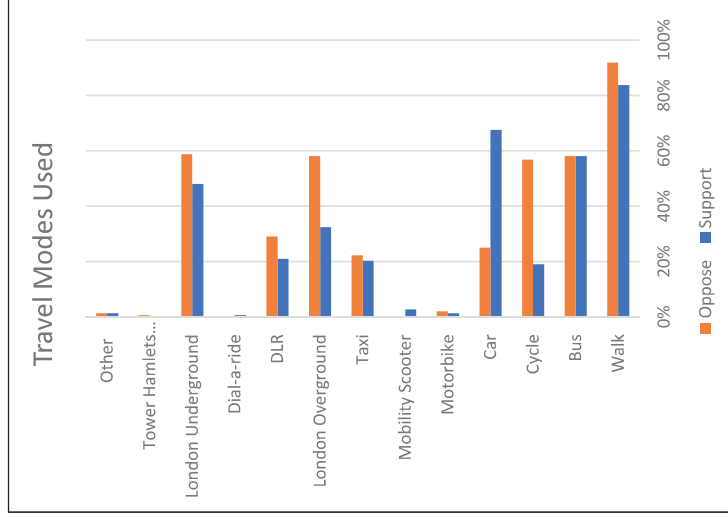
A total of 1345 responses received. 500 (37%) were from within the consultation area. Responses which used the resident code sent out across the scheme area totalled 317 or 23% of all responses. .

A total of 1345 responses were received from outside the scheme area. These include other parts of Tower Hamlets with high concentrations in Bow and the Isle of Dogs. Responses were also received from other London borough with high levels of responses from Hackney, Waltham Forest, Islington and Lambeth.

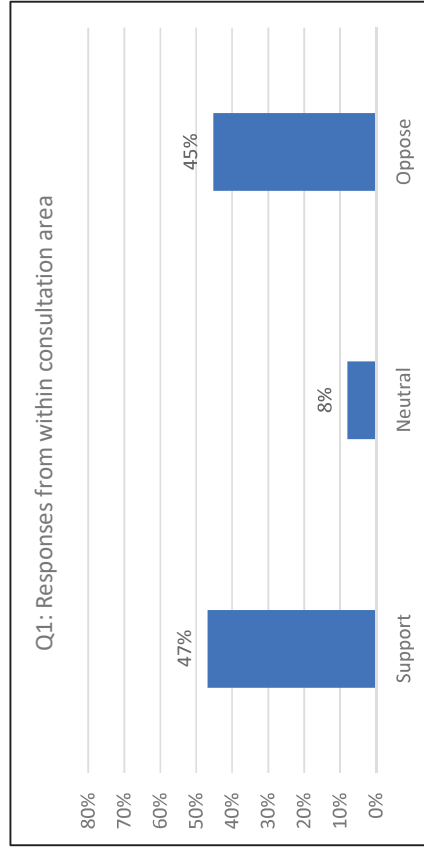
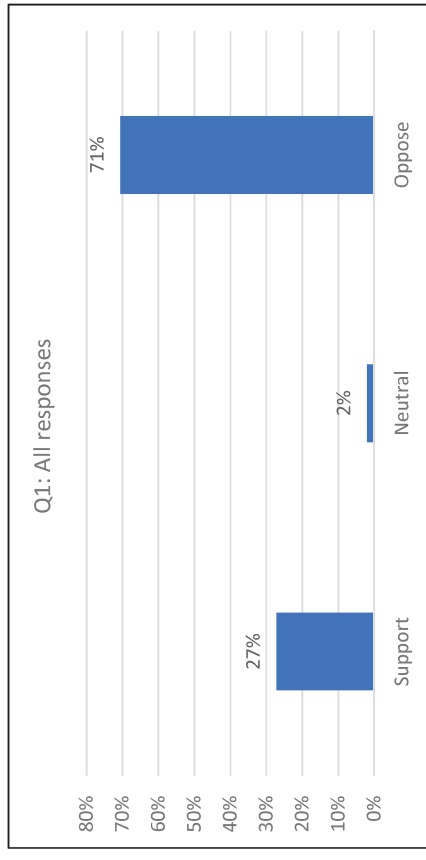


Distribution of responses

Responses from within the scheme area
 This page sets out responses to the travel mode question and the key questions around each of the traffic management changes set out in the first-round consultation document. These responses are from residents that used the resident reference code.



Question 1: How supportive are you of the proposed removal of the closures on Brick Lane from Hanbury Street to Woodseer Street and Buxton Street to Taylors Yard



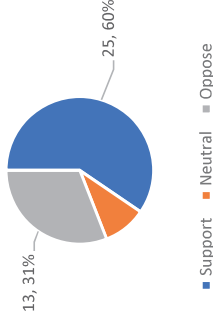
Appendix : How you responded to the Brick Lane first stage consultation

Demographic information

Age

The age profiles differed in terms of responses from those from younger and older respondents. For those opposed to the removal of closures 27% were over 45 and 13% over 65. This compares to those in support of closure removal where 48% were under 44 and 13% over 65.

Responses from people with disabilities

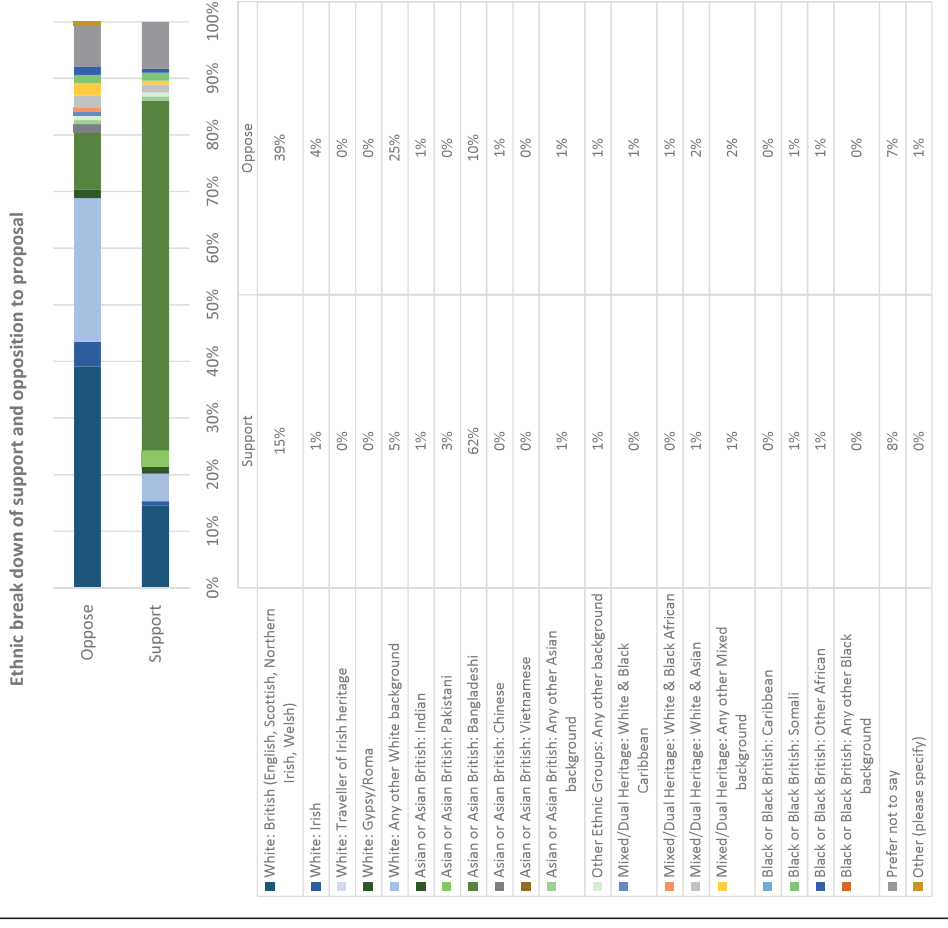


Ethnicity

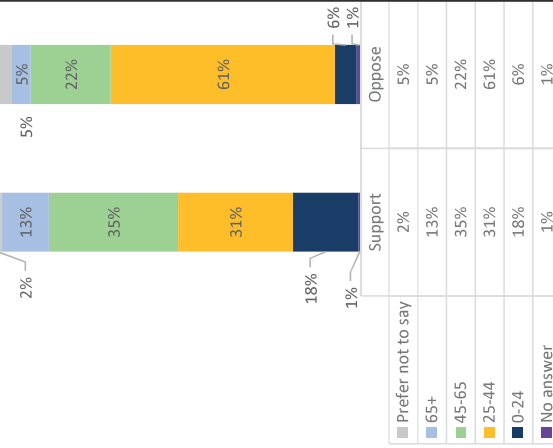
The ethnicity profiles differed in terms of responses from a white background and those from a Bangladeshi background. Those from a white background represented 64% of responses opposed to the removal of the closures compared to 21% in support. Those from a Bangladeshi background represented 5% of responses opposed to the removal of the closures compared to 67% in support.

Disability

From the 500 respondents, 42 stated they have long-standing illness or health condition. The chart below shows the distribution of support and opposition to the proposal. Analysis of these responses indicates a majority of respondents with disabilities showed support for the removal of the cameras closures on Brick Lane (60%).



Age distribution of responses



Appendix: Consultation feedback from the Brick Lane first stage consultation

Consultation feedback

For the first stage of the consultation, we received over 1345 responses both in support and opposed to the proposals to remove the Liveable Streets closures.

We also engaged with key stakeholders including the emergency services, TfL and local businesses.

Response text analysis - Key themes from those in support to the proposals

This section sets out the key themes coming from respondents supporting the proposals.

Increased journey times for those dependent on the use of a car

Respondents who felt they were reliant on the use of a car support removal of the closure on the grounds of reducing their journey times.

Example responses which illustrate this key theme are as follows:

"Exceptions should be made for people with disability, but the street can remain closed to general public"

"I need a car most of the time due to long term chronic pains on my joints. Find it very hard to walk longer than 5 minutes."

"Please remove these so called livable streets, you've in fact put people in danger when in emergency by blocking these roads, and also by restricting these areas I am unable to enter my residential area

which is inconvenient for everyone in our locality"

Displaced traffic and pollution

The most predominant key theme from respondents supporting the removal of closures related to the displacement of traffic to the wider area.

Example responses which illustrate this key theme are as follows:

"The closures lead to more vehicle traffic on side streets where more residents live"

"The road closures cause vehicles to take longer routes along the diverted routes which in turn increases congestion./traffic on the more residential side streets and also increases emissions on the longer journeys"

"I'm a regular cyclist / pedestrian on Brick Lane as I work in the area and have done for four years. The closures only divert vehicles part of the way and aren't a meaningful solution. The existing road closures divert traffic onto the side streets where people live. They also send vehicles on longer journeys around the block, increasing the vehicle time on the road, increasing congestion and increasing emissions and pollution"

Impact on Businesses

Some business within and close to the camera closures felt they discouraged customers from visiting Brick Lane through fear of

Example responses which illustrate this key theme are as follows:

"The closures are confusing and customers and delivery vans have received tickets. Its puts off people from visiting the area"

"It would be better for Brick Lane to be restored to how it was. These closures have impacted on trade"

Response text analysis - Key themes from those opposed to the proposals

This section sets out the key themes coming from those opposed to the proposals.

Traffic impact

The main theme around the opposition to the proposals relates to concerns around increasing traffic levels. Many feel that restricting traffic on Brick Lane during the closure times makes it safer, cleaner and more pleasant to live in and use as a public space. The following adverse impacts of high traffic levels are mentioned in the responses.

- Air pollution
- Noise
- Safety

Example responses which illustrate this key theme are as follows:

"We are in the middle of a climate emergency, and our air quality is horrible. We need to be limiting motor traffic, not encouraging it"

"I would prefer Hanbury street with no traffic, it is excessively noisy."

"Brick Lane is safer with the road closures in place, and as a parent of young children who walks with them through the area every day, I am concerned about their safety when cars start speeding through again"

Cost of proposals

There is another key theme around concerns regarding the costs of the proposal. It is felt that a significant amount of money has been spent on the closures and the money to reverse them could be better spent elsewhere.

Example responses which illustrate this key theme are as follows:

"A good amount of money was spent putting them in place only less than a year ago. Tower Hamlets council should be encouraging less use of personal cars and encouraging alternative means of transport"

Notes

Notes




Notes

Appendix C – Brick Lane Equalities Impact Assessment

Section 1: Introduction

Name of proposal
For the purpose of this document, 'proposal' refers to a policy, function, strategy or project
Liveable Streets Brick Lane Changes
Service area and Directorate responsible
Highways and Transportation Service, Public Realm Division, Place Directorate
Name of completing officer
Approved by (Corporate Director / Divisional Director/ Head of Service)
Simon Baxter
Date of approval
Click or tap to enter a date.

Conclusion	Current decision rating (see Appendix A)
As a result of performing the EIA, it is evident that for each option there is a risk that disproportionately negatively impacts (as described below) exist to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, this risk may be removed or reduced by implementing the actions detailed within the <i>Impact analysis and action plan</i> section of this document.	Amber 

The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between those with 'protected characteristics' and those without them
- Foster good relations between those with 'protected characteristics' and those without them

This Equality Impact Analysis provides evidence for meeting the Council's commitment to equality and the responsibilities outlined above. For more information about the Council's commitment to equality, please visit the Council's [website](#).

Section 2: General information about the proposal

Describe the proposal including the relevance of proposal to the general equality duties and protected characteristics under the Equality Act 2010

Motor vehicle access restrictions and placemaking measures were implemented in the Brick Lane area as part of the Liveable Streets programme (itself part of the Tower Hamlet's Love Your Neighbourhood portfolio) This programme had the key objectives of improving the look and feel of public spaces; improving the environment to encourage more walking and cycling; and attempting to reduce through traffic on residential streets.

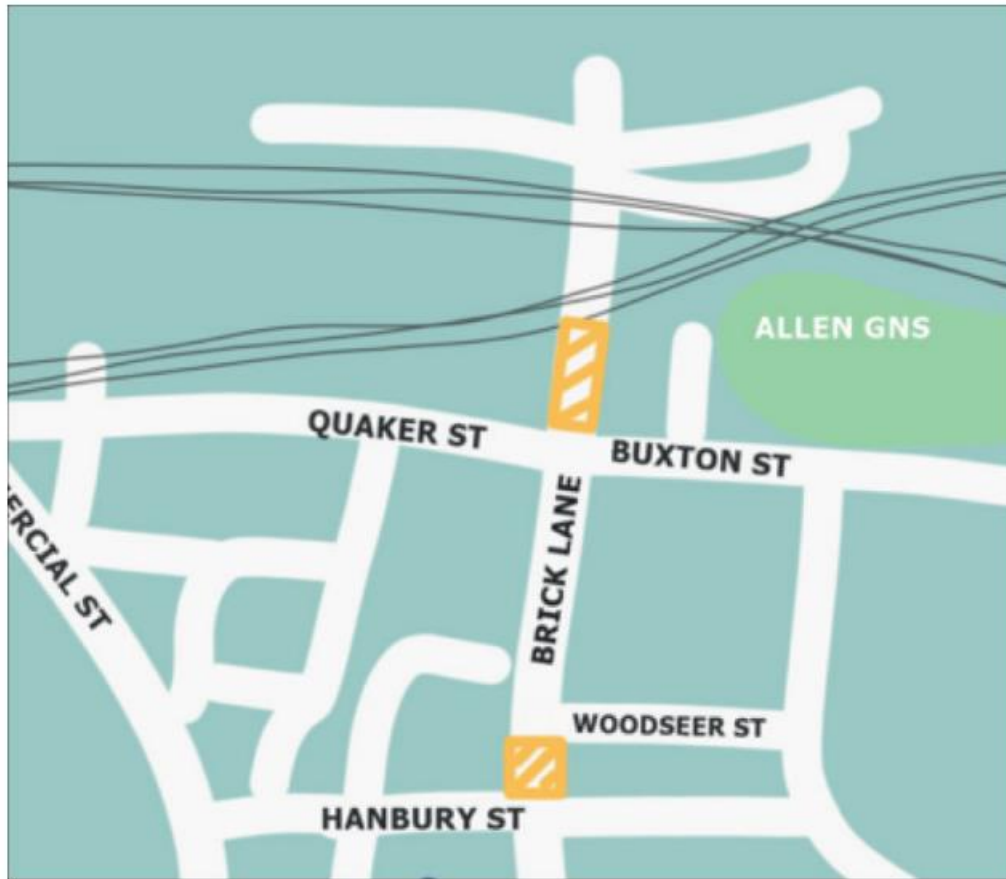
Proposed changes to Brick Lane

The Liveable Streets measures on Brick Lane consist of camera modal filters preventing motor vehicle access to several sections of Brick Lane. Throughout the period of implementation some elements have changed, with the standing arrangement consisting of:

1. Modal filter preventing motor vehicle access on Brick Lane between Hanbury Street and Woodseer Street from 12pm-11pm Saturdays and Sundays
2. Modal filter preventing motor vehicle access on Brick Lane between Buxton Street and the entrance to Taylor's Yard from 11am-11pm Saturdays and 8am-11pm on Sundays

The proposed is for these measures to be removed to allow motor vehicle access at all times except during Sunday market hours, these changes can be seen in **Figure 1**.

Figure 1: Proposed reversal of Liveable Streets measures on Brick Lane



Assumed traffic impact of removing the Liveable Streets measures

This EqIA is based on the following assumptions about the traffic impact of removing the road closures:

- The level of through-traffic on the parts of Brick Lane that currently have closures on them will increase once the restrictions are removed.
- There may be a reduction in traffic on local roads on the periphery of the scheme area because through-traffic reverts to Brick Lane. These include Woodseer Street which is the only access road to the public car park which is in the Truman Brewery site.
- The duration of the current restrictions is likely to have a limited impact on air pollution in the area.

Conclusion - To be completed at the end of the Equality Analysis process

Name: X
(signed off by)

Date signed off:
(approved)

Service area:
Public Realm

Team name:
Highways

Service manager: X

Name and role of the officer completing the EA: X

DRAFT

Section 3: Evidence (consideration of data and information)

What evidence do we have which may help us think about the impacts or likely impacts on residents, service users and wider community?

Data was obtained from the following sources:

- 2021 census
- Transport for London's London Travel Data Survey (LTDS)
- Department for Transport's STATS19
- Tower Hamlets Nitrogen Dioxide Diffusion Tube Results.
- Air Quality Action Plan 2022-27
- London Borough of Tower Hamlets LIP3 2018
- 2019, 2021 and 2022 traffic counts undertaken by the council
- DfT travel time delay data
- https://www.london.gov.uk/sites/default/files/who_cares_-_helping_londons_unpaid_carers_by_dr_onkar_sahota_am.pdf
- <https://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>
- Travel in London: Understanding our diverse communities 2019 (tfl.gov.uk)
- <https://democracy.islington.gov.uk/documents/s26001/Appendix%202%20-%20Steer%20Journey%20time%20analysis%20for%20PFS.pdf>
- <https://roadtraffic.dft.gov.uk/local-authorities/93>

General Evidence

2021 Census data was obtained by using the area codes in the scheme area. For the majority, data has been extracted at Output Area level. For some datasets, data is only available at Super Output Area level. For data on gender identity this is only available at Local Authority level. Data has been extracted to the lowest level to achieve greater granularity.

Figure 2 points of interest within the area. There is a cluster of places of worship on Brick Lane, as well as a school and two medical facilities. Section 4 identifies potential positive and negative impacts on protected characteristics of the proposal relating to these facilities.

Figure 2: Liveable Streets Brick Lane Key Destinations



Air Quality Data (NO2)

NO2 data from within the scheme and boundary roads was collected and compared with similar roads and streets in other parts of the borough. The data showed significant reductions between 2019 and 2022 across the borough.

Road Name(s)	2019 (NO2)	2022 (NO2)	Change	2019- 2022 percentage change
Whitechapel High St (KFC)	47.8	39.6	-8.2	-17%
Whitechapel Rd/Adler St	40.3	30.9	-9.4	-23%
Brick Lane/Princelet St	32.2	24.9	-7.3	-23%

Toynbee St/Commercial St	45.1	35.7	-9.4	-21%
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Car Ownership data

Car ownership data from the 2021 census for the scheme area shows almost three quarters of households have no access to a car. There is a higher proportion of vehicle ownership across the whole borough. Households in Tower Hamlets have the third lowest proportion of car ownership in London behind the boroughs of Camden and Islington.

TS045 - Car or van availability	Scheme Area		Tower Hamlets	London
No cars or vans in household	2610	73.8%	66.4%	42.1%
1 car or van in household	769	21.7%	28.7%	40.3%
2 cars or vans in household	135	3.8%	4.2%	13.6%
3 or more cars or vans in household	22	0.6%	0.7%	4.0%

¹Source: 2021 Census

Age (all age groups)

Census 2021 data indicates that 9.3% of residents in the scheme area are aged 60 and over; this is a higher proportion than the borough average of 8.4%. The proportion of younger people living in the scheme area is lower than in the borough as a whole. 14.9% of people in the scheme area are aged 0-14 compared to 17.5% across the borough.

In 2021, the numbers of children, working age adults and older people in Tower Hamlets have all increased since 2011. The largest proportionate rise is in the working age population (25% increase).

TS007A - Age by five-year age bands	Scheme Area		Tower Hamlets	London
Aged 4 years and under	478	5.2%	6.2%	6.0%
Aged 5 to 9 years	460	5.0%	5.7%	6.0%
Aged 10 to 14 years	443	4.8%	5.6%	6.1%
Aged 15 to 19 years	490	5.3%	5.9%	5.6%
Aged 20 to 24 years	1157	12.5%	10.3%	6.7%
Aged 25 to 29 years	1575	17.0%	14.3%	8.9%
Aged 30 to 34 years	1189	12.9%	13.1%	9.2%
Aged 35 to 39 years	838	9.1%	9.6%	8.4%
Aged 40 to 44 years	624	6.8%	7.3%	7.6%
Aged 45 to 49 years	495	5.4%	5.6%	6.7%
Aged 50 to 54 years	362	3.9%	4.5%	6.5%
Aged 55 to 59 years	271	2.9%	3.5%	5.8%
Aged 60 to 64 years	297	3.2%	2.7%	4.6%
Aged 65 to 69 years	207	2.2%	2.0%	3.5%
Aged 70 to 74 years	97	1.0%	1.4%	3.1%

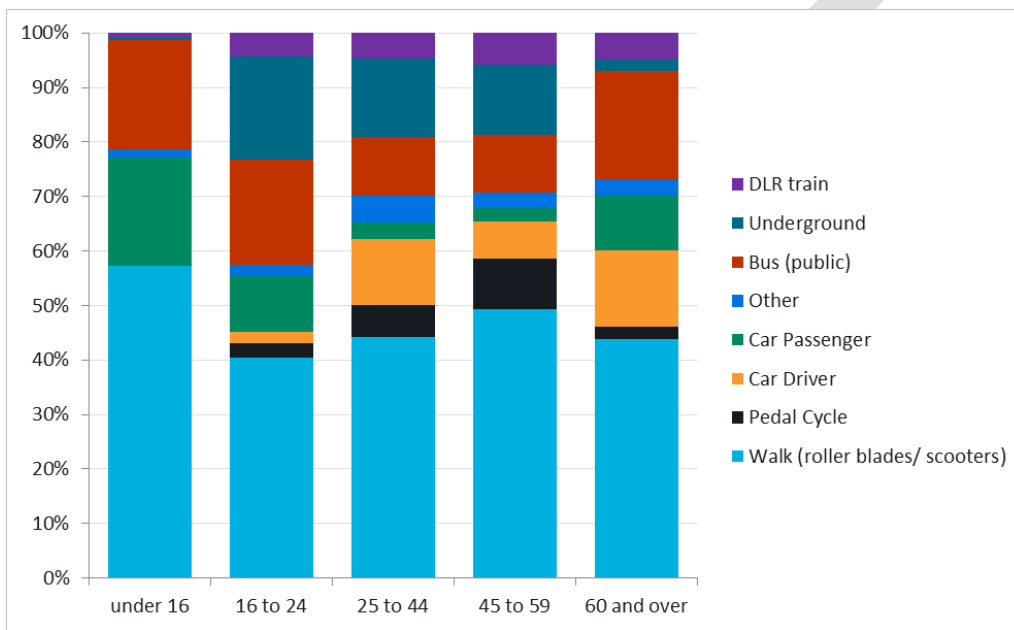
Aged 75 to 79 years	100	1.1%	0.9%	2.2%
Aged 80 to 84 years	86	0.9%	0.7%	1.6%
Aged 85 years and over	75	0.8%	0.7%	1.6%

Source: 2021 Census

Travel Mode Share

Figure 5 shows the mode share of trips made for all purposes by residents in Tower Hamlets by age group, drawn from the LTDS dataset. Those aged 60+ have higher car use than younger age groups with those aged 16 to 24 having the highest rates of Underground use. Mode share for walking is high across all age groups (over 40%) but is particularly high for those aged under 16 (57%). Cycling is most prevalent among those aged 25-44 (6%) and 45-59 (9%).

Figure 5: borough-wide mode share by age (all trips)

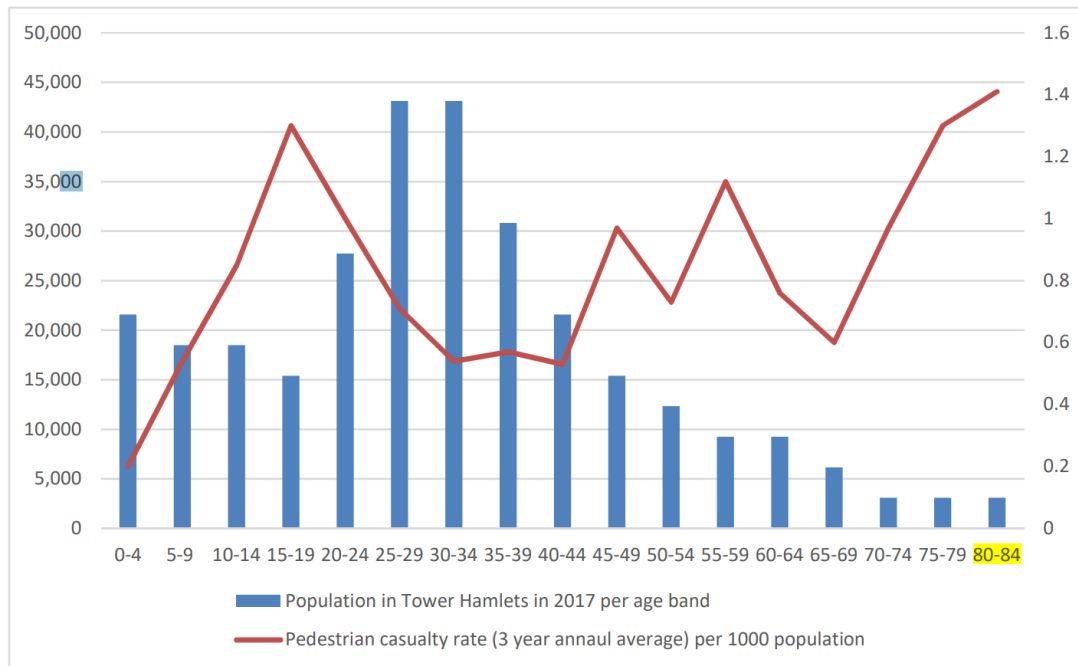


Source: LTDS, 2018/19 and 2019/20

Road Safety Data

The age at which residents are most likely to be injured as pedestrians in Tower Hamlets is 10-15 years and 80-84 years as measured in five-year age bands based on 2017 population against the number of average annual casualties per 1000 population (London Borough of Tower Hamlets LIP3).

Figure 11: Pedestrian casualty rate (3-year average for 2015, 2016 and 2017) per 1000 population against the number of Tower Hamlets population in five-year age bands (as of 2017).



Childhood Obesity

Childhood obesity levels for 4-5-year-olds and 10-11 year olds have increased and are notably higher in Tower Hamlets than national levels:

- Rates of **obesity** in Reception-aged children in Tower Hamlets have increased from 12.2% in 2019/20 to **15.6%** in 2020/21, higher than the London average (15.3%).
- Rates of Reception-aged children with **excess weight** have increased from 22.4% to **26.5%**.
- Rates of **obesity** in Year 6 children in Tower Hamlets have increased significantly from 25.9% in 2019/20 to **33.7%** in 2020/21, higher than the London average (30.0%).
- Rates of Year 6 children with **excess weight** in Tower Hamlets have increased from 41.8% to **50.4%**.

(NCMP data 2020/21 academic year)

It is important to encourage physical activity and exercise from a young age because inactive children are likely to become inactive adults, with evidence to show regular physical activity is linked to positive health outcomes¹. Walking or cycling to school can be a way of incorporating physical activity into daily routines.

Disability (Physical, learning difficulties, mental health and medical conditions)

There are over 7,000 blue badge holders within the borough. The ratio of retired blue badge holders to all blue badge holders in Tower Hamlets is 2.7:1, and 4.7% of the retired population holds a blue badge. There are 1,634 taxicard members within the borough.

TS037 - General health	Very good health	Good health	Fair health	Bad health	Very bad health
Scheme Area	4529	2745	929	339	123

¹ <https://www.gosh.nhs.uk/conditions-and-treatments/general-health-advice/leading-active-lifestyle/exercise-children-and-young-people/> accessed August 2022

	52.3%	31.7%	10.7%	3.9%	1.4%
London	53.6%	31.8%	10.3%	3.2%	1.0%
Tower Hamlets	53.0%	32.1%	10.0%	3.6%	1.3%

3Source: 2021 Census

The proportion of residents living in the scheme area with bad/very bad health is slightly higher than the borough and London average.

Limitation of day-to-day activities

TS038 - Disability	Disabled under the Equality Act: Day-to-day activities limited a lot	Disabled under the Equality Act: Day-to-day activities limited a little	Not disabled under the Equality Act: Has long term physical or mental health condition but day-to-day activities are not limited	Not disabled under the Equality Act: No long term physical or mental health conditions
Scheme Area	561 6.1%	690 7.5%	368 4.0%	7604 82.4%
Tower Hamlets	5.7%	7.3%	4.5%	82.5%
London	5.7%	7.5%	5.2%	81.5%

4Source: 2021 Census

There is a slightly higher proportion of people in the scheme area whose day-to-day activities are limited (a little and a lot) than in the wider borough.

Sex

TS008 - Sex	Female	Male
Scheme Area	4269 49.0%	4438 51.0%
Tower Hamlets	49.8%	50.2%
London	51.5%	48.5%

5Source: 2021 Census

There is a slightly higher proportion of males in the scheme area than there are females.

In London, data published by TfL shows women are less likely to drive (35% compared to 45% of men drive once a week) and are less likely to cycle or travel by train, Tube or motorbike. They are also more likely to travel with buggies, which can impact their travel choices. TfL data also shows cyclists are more likely to be male. The study also found that 87% of women never use cycling as a mode of transport around London ('*Understanding the travel needs of London's diverse communities: Women, April 2012*'). According to the Tower Hamlets Annual Residents Survey (2019), women are less likely to cycle in London due to road safety concerns. Research carried out by TfL in 2014 identified that women make a greater number of journeys per weekday than men. Trips made by women tend to be shorter and completed using different types of transport than journeys made by men.

On average across England in 2018, women made more journeys via taxi or PHVs compared to men (11 trips per person per year to 10 trips per person per year respectively). However, men travel further distances than women. The majority of taxi and PHV drivers are male (98%)².

Gender reassignment

Census 2021 included a question about gender identity. Data for this question is provided at local authority. 0.6% of residents in Tower Hamlets said their gender identity was different from their sex registered at birth. This is broadly comparable to the London average of 0.5%.

Marriage and civil partnerships

TS002 - Legal partnership status	Scheme Area		Tower Hamlets	London
Married or in a registered civil partnership: Married	2208	28.4%	31.6%	39.7%
Married or in a registered civil partnership: In a registered civil partnership	29	0.4%	0.4%	0.3%
Separated, but still legally married or still legally in a civil partnership: Separated, but still married	124	1.6%	1.9%	2.3%
Separated, but still legally married or still legally in a civil partnership: Separated, but still in a registered civil partnership	1	0.0%	0.0%	0.0%
Divorced or civil partnership dissolved: Divorced	343	4.4%	5.0%	7.2%
Divorced or civil partnership dissolved: Formerly in a civil partnership now legally dissolved	3	0.0%	0.1%	0.0%
Widowed or surviving civil partnership partner: Widowed	318	4.1%	2.7%	4.2%
Widowed or surviving civil partnership partner: Surviving partner from civil partnership	1	0.0%	0.0%	0.0%
Never married and never registered a civil partnership	4754	61.1%	58.3%	46.2%

⁶Source: 2021 Census

Research from 2019, demonstrates that poverty is twice as high for lone parents and children in lone-parent families, compared to couple families, although lone parents and families with children are both more at risk of transport poverty compared to average³.

Religion or philosophical belief

TS030 - Religion	Scheme Area		Tower Hamlets	London
No religion	2389	25.9%	26.6%	27.1%
Christian	1501	16.3%	22.3%	40.7%
Buddhist	87	0.9%	1.0%	0.9%
Hindu	159	1.7%	2.0%	5.1%

² Taxi and Private Hire Vehicles Statistics: England 2019

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/833569/taxi-and-phv-england-2019.pdf

³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/953951/Transport_and_inequality_report_document.pdf

Jewish	41	0.4%	0.4%	1.7%
Muslim	4377	47.5%	39.9%	15.0%
Sikh	8	0.1%	0.3%	1.6%
Other religion	43	0.5%	0.5%	1.0%
Not answered	613	6.7%	6.9%	7.0%

7Source: 2021 Census

The proportion of people indicating they have no religion, and those declining to state their religion, is lower in the scheme area than the Tower Hamlets and London averages. The proportion of residents who are Muslim in the scheme area is 47.5% which is significantly higher than the borough average, and the proportion of residents in the scheme area who are Christian is 16.3%, lower than the borough average.

Race

There is a higher proportion of Asian, Asian British or Asian Welsh: Bangladeshi in the scheme area than the borough average (47.1% compared to 34.6%). There is a lower proportion of White: British in the scheme area than in the borough as a whole (19.5% compared to 22.9%).

TS021 - Ethnic group	London	Tower Hamlets	Scheme Area	
Asian, Asian British or Asian Welsh: Bangladeshi	3.7%	34.6%	4683	47.1%
Asian, Asian British or Asian Welsh: Chinese	1.7%	3.3%	153	1.5%
Asian, Asian British or Asian Welsh: Indian	7.5%	3.3%	33	0.3%
Asian, Asian British or Asian Welsh: Pakistani	3.3%	1.1%	24	0.2%
Asian, Asian British or Asian Welsh: Other Asian	4.6%	2.2%	66	0.7%
Black, Black British, Black Welsh, Caribbean or African: African	7.9%	5.0%	717	7.2%
Black, Black British, Black Welsh, Caribbean or African: Caribbean	3.9%	1.6%	276	2.8%
Black, Black British, Black Welsh, Caribbean or African: Other Black	1.7%	0.8%	75	0.8%
Mixed or Multiple ethnic groups: White and Asian	1.4%	1.4%	87	0.9%
Mixed or Multiple ethnic groups: White and Black African	0.9%	0.7%	36	0.4%
Mixed or Multiple ethnic groups: White and Black Caribbean	1.5%	1.2%	54	0.5%
Mixed or Multiple ethnic groups: Other Mixed or Multiple ethnic groups	1.9%	1.7%	150	1.5%
White: English, Welsh, Scottish, Northern Irish or British	36.8%	22.9%	1941	19.5%
White: Irish	1.8%	1.1%	165	1.7%
White: Gypsy or Irish Traveller	0.1%	0.0%	0	0.0%
White: Roma	0.4%	0.7%	9	0.1%
White: Other White	14.7%	14.6%	1116	11.2%

Other ethnic group: Arab	1.6%	1.2%	105	1.1%
Other ethnic group: Any other ethnic group	4.7%	2.7%	243	2.4%

8Source: 2021 Census

TS021 - Ethnic group	London	Tower Hamlets	Scheme Area	
All other	23.3%	13.8%	624	6.3%
Black	13.5%	7.4%	1068	10.8%
Bangladeshi	3.7%	34.6%	4683	47.1%
Mixed	5.7%	5.0%	327	3.3%
White Other	17.0%	16.4%	1290	13.0%
White English, Welsh, Scottish, NI or British	36.8%	22.9%	1941	19.5%

9Source: 2021 Census

Ethnic minority residents are more likely to undertake journeys by walking or by public transport than white Londoners, however, they are more likely to be concerned about their personal security and safety than white Londoners, especially at night.

- Ethnic minority Londoners, both adults and children are almost twice as likely as white Londoners to be injured on the roads as a car occupant and reducing this statistic is a priority. Ethnic minority road users also have the highest risk of being a pedestrian casualty. White Londoners are at higher risk with being involved in a cycle collision than other groups of cyclists.
- Ethnic minority Londoners are also less likely than white Londoners to say that they feel safe from road accidents when walking around London, either during the day or at night.

Walking is the most commonly used type of transport by ethnic minority Londoners⁴. Use of cars among ethnic minority Londoners is lower than for white Londoners, with 32% and 43% respectively driving a car at least once a week. Car use is higher among Asian Londoners compared to other minority ethnic groups (38% of Asian Londoners drive a car at least once a week, compared to 25% of black Londoners). In contrast, higher proportions of white Londoners travel by bike, car, black cab, National Rail and motorbike than ethnic minority Londoners.

In England, there are significantly higher rates of incidence of asthma within ethnic minority groups. When subdivided, there are even higher rates of asthma incidence in people in ethnic minority groups born inside the UK than those born outside the UK; second and third generation descendants of South Asian and Afro-Caribbean migrants suffer disproportionately from asthma. Inequalities exist between ethnic groups and asthma registrations in the older age groups. 12.9% of Tower Hamlets' South Asian population over 70 years old have been diagnosed with asthma compared with 8.3% of the white and 5.2% of the black population over 70⁵.

Sexual orientation

According to TfL's 'Travel in London: Understanding our diverse communities' 2019 study, lesbian, gay and bisexual (LGB) people have a similar profile to the general population in terms

⁴ Understanding the travel needs of London's diverse communities BAME April 2012
<http://content.tfl.gov.uk/BAME.pdf>

⁵ Travel in Tower Hamlets Transport Strategy Evidence Base & Bibliography Annex A, 2019
<https://democracy.towerhamlets.gov.uk/mgConvert2PDF.aspx?ID=160546>

of barriers to using public transport more frequently. For example, 48% of Londoners identify overcrowding as a barrier compared to 52% of LGB Londoners, and 41% identify cost of travel as a barrier in both groups.

Census 2021 data indicates that the proportion of residents in the scheme area that are straight or heterosexual is 81.2%, lower than the borough and London average of 83.1% and 86.2% respectively.

TS077 - Sexual orientation	Scheme Area		Tower Hamlets	London
Straight or Heterosexual	39922	81.7%	83.1%	86.2%
Gay or Lesbian	1879	3.8%	4.0%	2.2%
Bisexual	1323	2.7%	2.5%	2.0%
All other sexual orientations	346	0.7%	0.7%	0.4%
Not answered	5367	11.0%	9.8%	9.5%

¹⁰Source: 2021 Census

Pregnancy and Maternity

There is no Census 2021 data relating to this protected characteristic. Data from the Office for National Statistics⁶ shows that the conception rate across the borough as a whole was 62.8 per 1,000 women, which is below the London rate of 76.2 per 1,000 women. Data are not available at the ward level.

There is little evidence to draw upon about pregnancy and maternity in terms of transport and public realm. Looking beyond the UK, research published by the US Federal Transit Administration considered the challenges experienced by pregnant women using public transport⁷. Although this study is focused on public transport, its wider findings help to illustrate how streets and public realm pose challenges to pregnant women or people on maternity leave. Included in the findings are that unsafe footways and crossings pose a particular challenge to, that safety and security are critical concerns and that pregnant women may incur higher transport costs than other people because they make more trips due their role as a carer or make more expensive trips to address concerns about safety and security.

Parents/ Carers

The data below shows the proportion of unpaid carers in the scheme area, in Tower Hamlets and in London. The proportion of carers in the scheme area is equivalent to the borough average, and slightly lower than the London average.

TS039 - Provision of unpaid care	Scheme Area		Tower Hamlets	London
Provides no unpaid care	8153	93.1%	93.6%	92.8%
Provides 19 hours or less unpaid care a week	258	2.9%	2.8%	3.6%
Provides 20 to 49 hours unpaid care a week	160	1.8%	1.8%	1.7%
Provides 50 or more hours unpaid care a week	183	2.1%	1.8%	2.0%

⁶

<https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/conceptionandfertilityrates/datasets/conceptionstatisticsenglandandwalesreferencetables>

⁷ <https://www.transit.dot.gov/sites/fta.dot.gov/files/2022-02/FTA-Report-No-0211.pdf>

11Source: 2021 Census

The National Travel Survey (2019) suggests that one barrier preventing children walking to school is their parents not allowing them. A further study suggests parents might be less likely to cycle with their children due to perceived road safety risks, and as a result may opt to drive short journeys that could otherwise be walked or cycled⁸.

Gender Identity

In 2021 the Census included a question on gender identity. Lowest level data for this gender identity is at local authority level. There is a slightly lower proportion of Tower Hamlets residents whose gender is the same as registered at birth than the London average – 90.7% compared to 91.2%.

TS078 - Gender identity	Tower Hamlets	London
Gender identity the same as sex registered at birth	90.7%	91.2%
Gender identity different from sex registered at birth but no specific identity given	0.6%	0.5%
Trans woman	0.1%	0.2%
Trans man	0.1%	0.2%
All other gender identities	0.2%	0.1%
Not answered	8.3%	7.9%

12Source: 2021 Census

Data is not available about mode choice preferences or other travel behaviours disaggregated by gender identity.

Socio-economic

The table below shows a comparison of levels of household deprivation in the scheme area to deprivation in Tower Hamlets and more widely across London. The four dimensions of deprivation measured are **Employment, Education, Health & disability, and Housing**. The data shows that deprivation, specifically severe deprivation (i.e. in more than one dimension) is on par with the borough average.

TS011 - Households by deprivation dimensions	Household is not deprived in any dimension	Household is deprived in one dimension	Household is deprived in two dimensions	Household is deprived in three dimensions	Household is deprived in four dimensions
Scheme Area	46.3%	31.1%	16.1%	6.0%	0.4%
Tower Hamlets	46.4%	31.8%	15.5%	5.9%	0.4%
London	48.1%	32.9%	14.4%	4.3%	0.4%

13Source: 2021 Census

At the time of the 2021 Census, 55.7% of working age residents in the scheme area were employed. This is lower than the borough overall (58.7%), and less than London (59.4%). There is a higher percentage of residents who are economically inactive due to long term sickness or disability in the scheme area compared to Tower Hamlets and London averages.

⁸ BMC Public Health 2018 Understanding child and parent perceptions of barriers influencing children's active school travel
<https://bmcpublichealth.biomedcentral.com/track/pdf/10.1186/s12889-018-5874-y.pdf>

TS066 - Economic activity status	Scheme Area		Tower Hamlets	London
Economically active (excluding full-time students): In employment	4348	55.9%	58.7%	59.4%
Economically active (excluding full-time students): Unemployed	410	5.3%	4.7%	4.1%
Economically active and a full-time student: In employment	269	3.5%	2.7%	2.0%
Economically active and a full-time student: Unemployed	101	1.3%	1.3%	0.7%
Economically inactive: Retired	455	5.9%	5.8%	12.9%
Economically inactive: Student	758	9.8%	9.6%	7.2%
Economically inactive: Looking after home or family	687	8.8%	8.4%	6.0%
Economically inactive: Long-term sick or disabled	335	4.3%	4.0%	3.6%
Economically inactive: Other	411	5.3%	4.7%	4.1%

14Source: 2021 Census

Section 4: Assessing the impacts on different groups and service delivery

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
Protected				
Age (All age groups)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Census 2021 data indicates that 9.3% of residents in the scheme area are aged 60 and over; this is a higher proportion than the borough average of 8.4%.</p> <p>The traffic data indicated a combination of increases and decreases in total traffic volumes and in the scheme areas. The impact of the proposed changes may also be mixed depending on a street.</p> <p><u>Older people</u></p> <p>Potential positive impacts for older people</p> <ul style="list-style-type: none"> • Older people may be more likely to use private cars and taxi services. A larger percentage of over 60s drive than any other age group in Tower Hamlets. Older people are more likely to use private cars, taxi, have a Blue Badge for age-related disabilities or Dial-a-Ride services for door-to-door journeys. They are also more likely to rely on family members or friends for travel support e.g. to access daily care or ferrying to medical appointments. • Reinstating through-traffic during the restriction periods could benefit older people through better travel opportunities by car across the local area. • Longer routes and time taken to navigate areas may have a negative impact on the willingness of private hire vehicles from picking up residents in those areas. Removal of closures may result older residents whose day-to-day activities were limited due to a health problem or disability being more independent and mobile. <p>Potential negative impacts for older people</p> <ul style="list-style-type: none"> • The age at which residents are most likely to be injured as pedestrians in Tower Hamlets is 10-15 years and 80-84 years as measured in five-year age bands based on 2017 population

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
Protected				<p>against the number of average annual casualties per 1000 population. (Source Transport Strategy evidence base LBTH LIP3). The existing scheme has created locations free from traffic on Brick Lane, reducing the threat caused by motor traffic during the control times, particularly from larger vehicles such as vans or HGVs. Reintroducing through traffic is likely to impact younger people who, along with older people, are disproportionately negatively impacted by road danger, particularly as the current restrictions cover times over the weekend when pedestrians are more likely to be out for leisure activities, making use of the shops, restaurants and bars in the area.</p> <p><u>Young people & children</u></p> <p>The proportion of younger people living in the scheme area is lower than in the borough as a whole. 14.9% of people in the scheme area are aged 0-14 compared to 17.5% across the borough.</p> <p>Potential positive impacts</p> <ul style="list-style-type: none"> • A proportion of young people are driven as passengers, and as such the proposals could reduce their journey times as a result of the removal of the restrictions. • Those relying on bus services to access education and employment opportunities may also see improved journey times and reliability of their journeys on roads on the periphery of the scheme area where congestion may be reduced by allowing through-traffic to return to Brick Lane. However, the duration of the current restrictions is likely to have a limited impact on congestion in the area. <p>Potential negative impacts</p> <ul style="list-style-type: none"> • The age at which residents are most likely to be injured as pedestrians in Tower Hamlets is 10-15 years and 80-84 years as measured in five-year age bands based on 2017 population against the number of average annual casualties per 1000 population. (Source Transport

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
Protected				<p>Strategy evidence base LBTH LIP3). The existing scheme has significantly reduced the volumes of traffic through Brick Lane, reducing the threat caused by motor traffic, particularly from larger vehicles such as vans or HGVs who could no longer cut through the area. Reintroducing of through traffic is likely to impact younger people who, along with older people, are disproportionately negatively impacted by road danger, particularly as the current restrictions cover times over the weekend when pedestrians are more likely to be out for leisure activities, making use of the shops, restaurants and bars in the area.</p> <p>Actions to mitigate against any disproportionate impacts on this cohort is detailed in Section 5 'Impact analysis and action plan'</p>
<p>Disability (Physical, learning difficulties, mental health and medical conditions)</p>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>In 2021 the census asked about residents general health and limitation of day-to-day activities. Census 2021 data indicates that the proportion of residents living in the scheme area with bad/very bad health is slightly higher than the borough and London average.</p> <p>With regard to the Census question about limitation of day-to-day activities, 13.6% of residents in the scheme area said their day-to-day activities were limited to some extent. This is slightly higher than the borough and London average.</p> <p>Potential positive impacts</p> <p>Disabled people are more likely than non-disabled people to rely upon family members or friends for daily care. The 2021 Census indicates that 31,800 (6.4%) Tower Hamlets residents spend at least an hour a week caring for someone – equivalent to 8.5% of the population⁹. The removal of the restrictions may reduce journey times and/or distance for carers who visit the area in a private car. This may allow carers to attend more regularly or reduce delays. It should be noted however, that exemptions are available to the Brick Lane filters for Blue Badge holders and locally impacted residents (those requiring direct access within the scheme area). They are also more likely to rely on family members or friends for travel support e.g. to access daily care or ferrying to medical appointments.</p>

⁹ https://www.london.gov.uk/sites/default/files/who_cares_-_helping_londons_unpaid_carers_by_dr_onkar_sahota_am.pdf

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
Protected				<ul style="list-style-type: none"> The existing restrictions may have negatively impacted on journey times for those with mobility impairments who may find it more difficult to walk or cycle, and therefore need to make use of door-to-door transport services such as private cars (and do not have a Blue Badge). Increased journey times may have led to further discomfort and anxiety for some disabled people, and ultimately may have had a detrimental impact on their mental or physical health. The reintroduction of through-traffic is likely to benefit these people, with shortened journey times/distances during the operating hours of the scheme. <p>Potential negative impacts</p> <ul style="list-style-type: none"> It is recognised that certain impairments may mean disabled people are more at risk of road danger, noise and pollution. Mobility impairment or mental health issues increase the challenge of day-to-day activities such as travelling. For people who are blind or partially sighted, and for people with mobility impairments, the reintroduction of vehicle traffic may reduce their confidence in walking, cycling, using a mobility scooter or accessing public transport. Brick Lane has narrow footways in places, and is frequently busy with pedestrians, while through-traffic is limited disabled people are able to use the carriageway to navigate obstacles (e.g. street clutter or crowds). The ability to use the carriageway safely while walking or wheeling would be limited by the reintroduction of through-traffic during the period when the current restrictions are in place. <p>Actions to mitigate against any disproportionate impacts on this cohort is detailed in Section 5 'Impact analysis and action plan'</p>
Sex	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Census 2021 data indicates that there is a slightly higher proportion of males in the scheme area than there are females.</p> <p>Potential positive impacts</p> <ul style="list-style-type: none"> A potential reduction in fear of crime as a result of more traffic on streets in the scheme area, although the evidence for this is mixed. ONS data shows that a greater

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
Protected				<p>proportion of women than men feel unsafe in quiet streets particularly after dark 10 and the media has reported on women feeling unsafe on streets with fewer motor vehicles due to traffic restrictions. In terms of actual numbers in the scheme area, the evidence base showed a negligible change in the number of recorded instances of violence and sexual offences in the periods prior-to and post-implementation within the study area. In addition, it should be noted however that the current restrictions have been timed to coincide with periods when pedestrian footfall is at its highest (weekends where residents and visitors take advantage of the markets, restaurants, shops and pubs) and therefore it is likely that fear of feeling unsafe in quiet streets is less likely to be a potential impact.</p> <ul style="list-style-type: none"> Men are more likely to drive than women, and as a result the proposals which will facilitate motor vehicle journeys are more likely to positively impact men than women. The proposal to open streets may make it quicker and easier to get around by car or taxi. <p>Potential negative impacts</p> <ul style="list-style-type: none"> The Tower Hamlets Annual Residents Survey (2019) found that women are more conscious than men of road danger when choosing how to travel. The presence of motor traffic may discourage women than men from cycling, therefore with higher traffic levels on streets in the scheme area may be less able to experience the benefits afforded by cycling (evidence). Women are more likely than men to walk for local journeys and therefore more likely to be exposed to the negative consequences of more traffic on the streets such as increased road danger and air pollution. However, the duration of the current restrictions is likely to have a limited impact on traffic safety in the area. <p>Actions to mitigate against any disproportionate impacts on this cohort is detailed in Section 5 'Impact analysis and action plan'</p>

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
Protected				
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Census 2021 included a question about gender identity. Data for this question is provided at local authority. 0.6% of residents in Tower Hamlets said their gender identity was different from their sex registered at birth. This is broadly comparable to the London average of 0.5%.</p> <p>There is no estimated direct or indirect disproportionate impact of these proposals to residents on the grounds of different gender identities.</p>
Marriage and civil partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Census 2021 data indicates that the proportion of residents in the scheme area that are married is 28.5% and is lower than the borough (32.6%) and London average (39.7%).</p> <p>There is no estimated direct or indirect disproportionate impact of these proposals to residents on the grounds of marriage and civil partnership status.</p>
Religion or philosophical belief	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The proportion of people indicating they have no religion, and those declining to state their religion, is lower in the scheme area than the Tower Hamlets and London averages. The proportion of residents who are Muslim in the scheme area is 47.5% which is significantly higher than the borough average, and the proportion of residents in the scheme area who are Christian is 16.3%, lower than the borough average.</p> <p>Potential positive impacts</p> <p>There are a number of places of worship in the area of which Brick Lane Mosque is the largest. Vehicle access will be improved to places of worship as a result of the removal of the closures during the scheme operational hours.</p>
Race	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Census 2021 data indicates that there is a higher proportion of Asian, Asian British or Asian Welsh: Bangladeshi in the scheme area than the borough average (47.1% compared to 34.6%). There is a lower proportion of White: British in the scheme area than in the borough as a whole (19.5% compared to 22.9%).</p>

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
Protected				<p>Potential positive impacts</p> <ul style="list-style-type: none"> In terms of transport mode used, across all Londoners, there is little difference in the frequency of walking and cycling between white Londoners and black, Asian and minority ethnic Londoners¹⁶ while car use is slightly higher among white Londoners. Although ethnic minority Londoners on average have lower car usage than white Londoners, Asian Londoners exhibit higher car usage than other minority ethnic groups. In the first stage consultation on the proposal to remove closures, Bangladeshis were much more likely to support than oppose the removal. The removal of closures would result in less traffic diverted during the closure times to the dense residential areas east of Brick Lane. The key areas that may benefit are concentrated around Hanbury Street and Spital Street. The removal of the closures may result in shorter journeys through Brick Lane and improve bus journey times and bus journey time reliability on the periphery of the scheme area by reducing traffic congestion on these roads, which could benefit black, Asian and minority ethnic people who are more likely to travel by bus than white Londoners. <p>Potential negative impacts</p> <p>JSNA data from 2015 shows that the prevalence of asthma is greatest among some ethnic minority groups, with 12.9% of the borough's South Asian population aged 70+ diagnosed with asthma compared to 8.3% of the white and 5.2% of the black population respectively. However, the duration of the current restrictions is likely to have a limited impact on air pollution in the area</p> <p>Actions to mitigate against any disproportionate impacts on this cohort is detailed in Section 5 'Impact analysis and action plan'</p>
Sexual orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
Protected				<p>Census 2021 data indicates that the proportion of residents in the scheme area that are straight or heterosexual is 81.2%, lower than the borough and London average of 83.1% and 86.2% respectively.</p> <p>There is no estimated direct or indirect disproportionate impact of these proposals to residents on the grounds of sexual orientation.</p>
Pregnancy and maternity	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>There is no Census 2021 data relating to this protected characteristic. We will investigate other data relating to this cohort. Data from the Office for National Statistics¹¹ shows that the conception rate across the borough as a whole was 62.8 per 1,000 women, which is below the London rate of 76.2 per 1,000 women. Data are not available at the ward level.</p> <p>Potential positive impacts</p> <ul style="list-style-type: none"> • There may be some benefit for pregnancy and maternity from the removal of the traffic restrictions for people using or more reliant upon motor vehicles for local journeys. Pregnant women and people on maternity leave may be more likely to use a private motor vehicle or a taxi/private hire vehicle because their mobility may be impaired, they may feel less confident walking or, and may have lots of things to carry having had a new baby. Facilitating through traffic on Brick Lane may improve journey times and accessibility for drivers making local journeys. • Pregnant women or people on maternity leave may benefit from easier and quicker journey times to medical appointments as a result of removing traffic restrictions. <p>Potential negative impacts</p> <ul style="list-style-type: none"> • Pregnant women or people on maternity leave may be deterred from walking or cycling in Brick Lane due to concerns road safety or increased exposure of themselves or their baby to noise and air pollution. This may result in a reduction in levels of physical exercise in this

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<https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/conceptionandfertilityrates/datasets/conceptionsstatisticsenglandandwalesreferencetable>

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
Protected				
				<p>cohort. However, the duration of the current restrictions is likely to have a limited impact on air pollution in the area</p> <ul style="list-style-type: none"> The duration of the current restrictions is limited to periods over the weekend and removing these restrictions is therefore likely to have a limited impact as residents are likely to apply the same mitigating measures to support their mobility and safety as they would during the periods when the restrictions are not in place. <p>Actions to mitigate against any disproportionate impacts on this cohort is detailed in Section 5 'Impact analysis and action plan'</p>
Other				
Socio-economic	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Deprivation data is measured through four dimensions: Employment, Education, Health & disability, and Housing. Census 2021 data shows that deprivation, specifically severe deprivation (i.e. in more than one dimension). The data shows that 53.6% of households in the scheme area and in the borough overall are deprived in one or more dimension.</p> <p>At the time of the 2021 Census, 55.7% of working age residents in the scheme area were employed. This is lower than the borough overall (58.7%), and less than London (59.4%). There is a higher percentage of residents who are economically inactive due to long term sickness or disability in the scheme area compared to Tower Hamlets and London averages.</p> <p>Potential positive impacts</p> <ul style="list-style-type: none"> Removing the closures could benefit those on low incomes who rely on cars to get around, including people who use a car for work such as taxi or PHV drivers as they will benefit from the potential reduction in journey times in and around Brick Lane. The removal of measures could benefit those on low incomes who may be reliant on cars, such as those undertaking work or caring responsibilities and/or travelling at times of the day when public transport accessibility is poor. This is because they may benefit from reduced

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
Protected				<p>vehicle journey lengths and times although journey time savings are likely to be marginal for anything but short car journeys¹².</p> <ul style="list-style-type: none"> • However, the duration of the current restrictions, and the relatively small geography of the scheme area is likely to have a limited impact on journey times and congestion. <p>Potential negative impacts</p> <ul style="list-style-type: none"> • Whilst the number of vehicles registered in the borough has increased slightly in recent years, Tower Hamlets still has one of the lowest levels of car ownership in London. Many households on low incomes are not able to afford a car. It is recognised that those on low incomes in London are less likely to drive, and more likely to walk, cycle or use bus services. Affordability of car ownership may mean that there is no impact in the levels of walking as a result of the removal of the scheme, though safety and cycling prevalence may decline <p>Actions to mitigate against any disproportionate impacts on this cohort is detailed in Section 5 'Impact analysis and action plan'</p>
Parents/Carers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Census 2021 data indicates that the proportion who have some unpaid caring responsibility is 6.8% in the scheme area. This is equivalent to the borough average and slightly lower than the London average.</p> <p>Potential positive impacts</p> <ul style="list-style-type: none"> • The current scheme already implements an exemption for registered and unregistered carers as well as residents. • Parents and carers may benefit from easier and quicker journey times to medical appointments as a result of removing traffic restrictions.

¹² See for example analysis conducted for Islington Council by consultants Steer on the impacts on journey times and lengths of low traffic neighbourhoods in Islington <https://democracy.islington.gov.uk/documents/s26001/Appendix%20-%20-%20Steer%20Journey%20time%20analysis%20for%20PFS.pdf> accessed August 2022.

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
Protected				
				<p>Potential negative impacts</p> <ul style="list-style-type: none"> The reintroduction of traffic could decrease the ability to use the carriageway to navigate Brick Lane with a pushchair and creates additional hazards to consider while travelling with children on foot. <p>Actions to mitigate against any disproportionate impacts on this cohort is detailed in Section 5 'Impact analysis and action plan'</p>
People with different Gender Identities e.g. Gender fluid, Non-Binary etc	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>In 2021 the Census included a question on gender identity. Lowest level data for this gender identity is at local authority level. There is a slightly lower proportion of Tower Hamlets residents whose gender is the same as registered at birth than the London average – 90.7% compared to 91.2%.</p> <p>There is no estimated direct or indirect disproportionate impact of these proposals to residents on the grounds of different gender identities</p>
Any other groups	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section 5: Impact analysis and action plan

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Update on progress
<i>Further data collection post implementation to measure the impact of proposals</i>	<i>Data collection</i>	<i>Six month monitoring</i>	<i>Simon Baxter</i>	<i>TBC</i>
<i>The council will commission a comprehensive study into improving the public realm for pedestrians in the areas around Brick Lane. It should consider walking routes throughout the area and should also consider parking arrangements on Brick Lane and how they impact on pedestrian use of Brick Lane. Key priorities will be:</i>	<i>Commission pedestrian study</i>	<i>Six month monitoring</i>	<i>Simon Baxter</i>	<i>TBC</i>

We have identified steps to mitigate any identified negative impacts and these are listed above. Following this consultation round, we will review the draft EIA, review these mitigating actions and develop alternative and/or additional mitigating actions where a need has been identified.

Section 6: Monitoring

What monitoring processes have been put in place to check the delivery of the above action plan and impact on equality groups?

Monitoring delivery

If option 1 is implemented, a project plan will be developed for delivery timescales including the milestones for each of the mitigating measure outlined in section 5.

Monitoring impact

Traffic counts

If option 1 is implemented, traffic counts will be undertaken for boundary roads and internal roads in order to assess the impact on traffic flows from the proposals.

Air quality

If option 1 is implemented, the council will develop a robust monitoring framework to assess the impact on NO₂, PM_{2.5} or PM₁₀ levels from the proposals. This will include new and more accurate monitoring equipment where required.

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2023 Liveable Streets Changes consultation – Brick Lane scheme area

Consultation findings report

Executive Summary

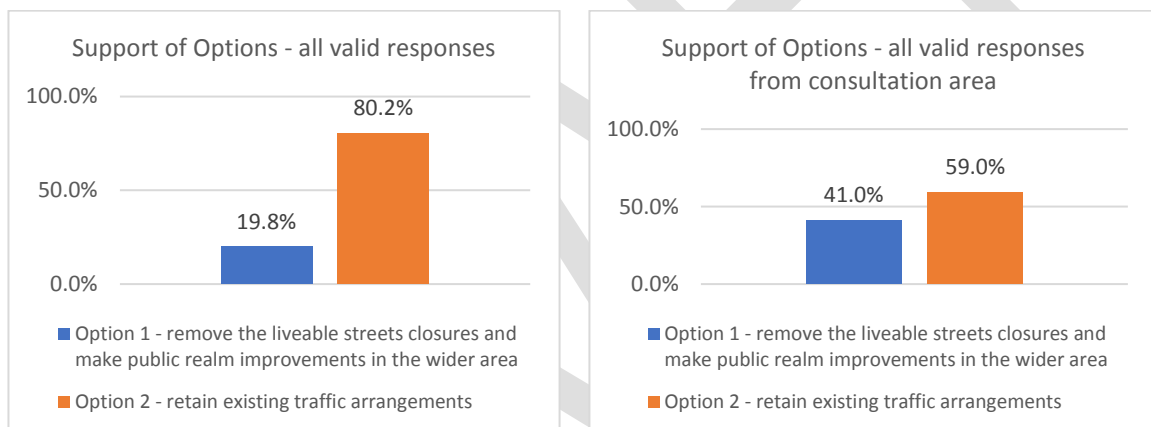
Analysis in this report includes the proportion of respondents who supported the two proposed options, and hereafter called Option 1 and Option 2.

- **I support Option 1 to remove the liveable streets closures and make public realm improvements to the wider area (Option 1)**
- **I support Option 2 to retain the existing traffic arrangements (Option 2)**

Survey responses have been presented in two ways:

- By all Valid respondents and
- By Valid respondents living in the consultation area.

The majority of valid survey responses were in support of Option 2, to retain existing traffic arrangements for both cases.



Background

The public consultation ran 23rd January 2023 and 12th February 2023 and sought view on options which have been developed for residents to consider. This report analyses the responses to the survey.

Responders were asked about their support for two options arising from the evaluation:

- I support Option 1 to remove the Liveable Streets closures and make public realm improvements to the wider area.
- I support Option 2 to retain the existing traffic arrangements

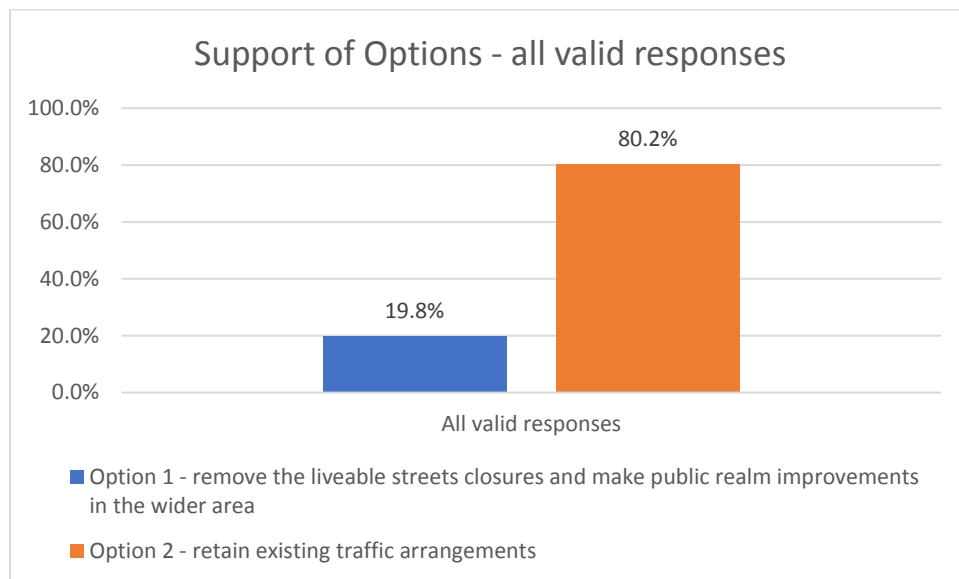
All responses

825 valid survey responses were received.

Of those, 618 were received online, and 208 were paper surveys.

Overall,

- Option 1 – to remove the liveable streets closures and make public realm improvements in the wider area received support from 163 survey respondents representing 19.8% of the share, and
- Option 2 – to retain existing traffic arrangements received support from 662 survey respondents representing 80.2% of the share.



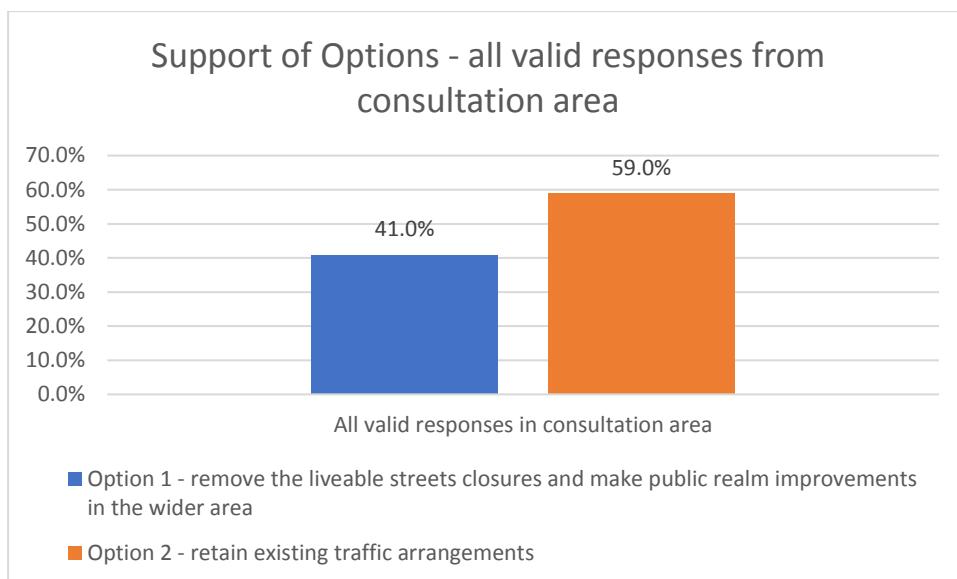
Responses from the consultation area

A unique reference number was provided in a letter and sent to all businesses and households within the Liveable Streets scheme area to help distinguish between those responding who may be directly impacted by the proposals. To further ascertain whether these responses were genuinely received from respondents from within the consultation area, we checked the postcode provided by online survey responders with the postcodes held for the borough. We discounted a small number where the respondent provided a code but provided an address outside of the consultation area. The combination of the use of the resident code and a postcode from within the consultation area is how we have determined which response is from the consultation area.

In total 266 valid survey responses were from responders who used the resident code and provided a postcode that was in the survey area.

Of those,

- 109 supported option 1 – to remove the liveable streets closures and make public realm improvements in the wider area, and
- 157 supported option 2 – to retain existing traffic arrangements.



Analysis

Analysis in this report includes the proportion of respondents who supported the two proposed options, and hereafter called Option 1 and Option 2.

- **I support Option 1 to remove the liveable streets closures and make public realm improvements to the wider area (Option 1)**
- **I support Option 2 to retain the existing traffic arrangements (Option 2)**

Survey respondents were asked which of the following best describes you? (please tick all that apply)

722 survey respondents described themselves as a resident and 59 described themselves as a business owner. 21 responses from business owners came from the consultation area. Of those eight supported Option 1 and thirteen supported Option 2.

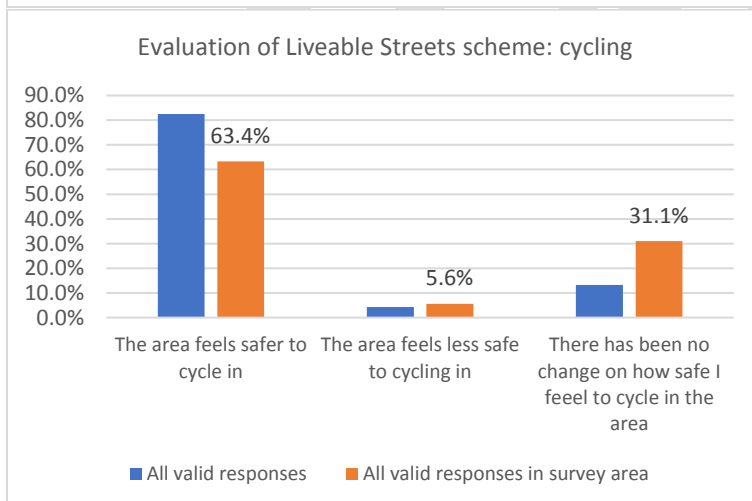
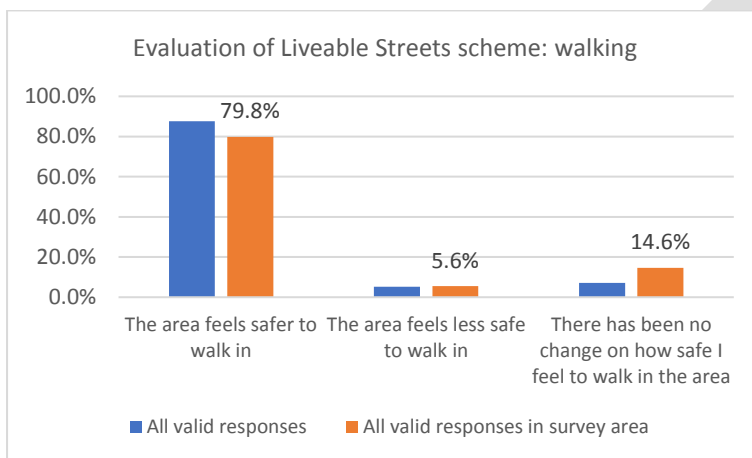
Evaluation of existing scheme

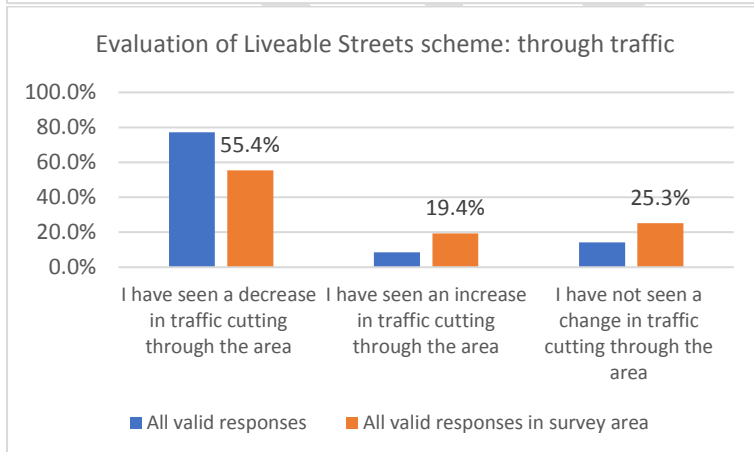
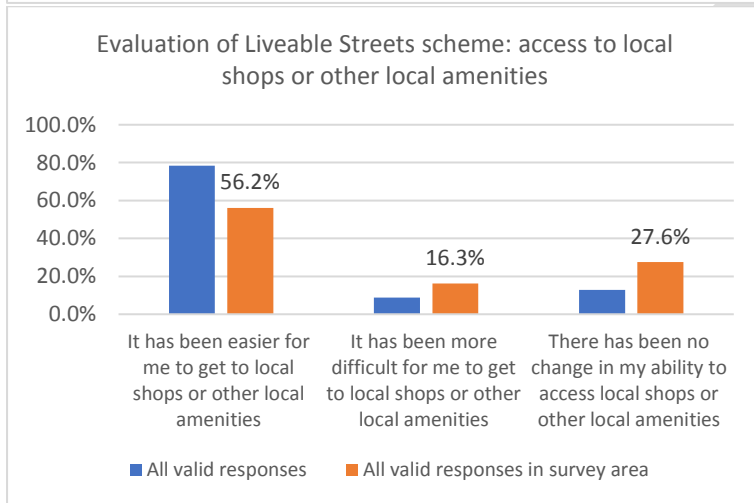
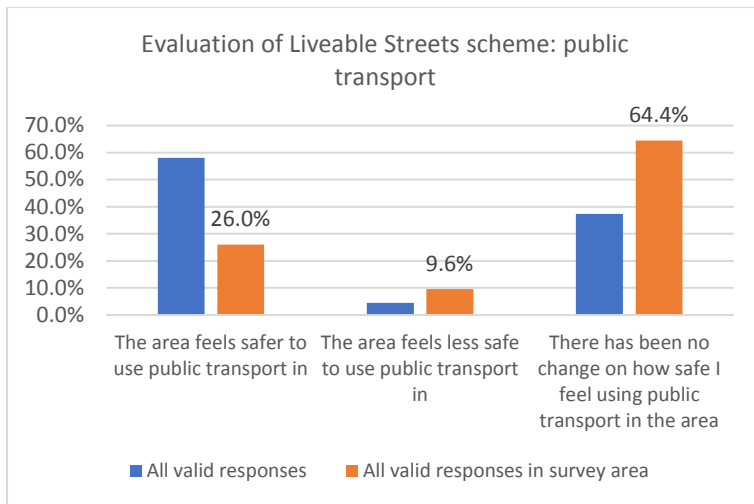
Survey responders were asked to evaluate the existing scheme. Responders were asked their opinion in a range of areas: Since the changes to roads in Bethnal Green were introduced under the Liveable Streets Scheme.

- Walking
- Cycling
- Use of public transport
- Traffic
- Access to shops and local amenities
- Air quality
- Traffic noise
- More pleasant neighbourhood

Not all survey respondents answered questions relating to the evaluation of the existing scheme. Overall, the majority of survey respondents reported either positive effects or no change since the introduction of liveable streets in all areas.

Most positive statement was around an improvement in safety walking around the area, with 87.6% of respondents agreeing with this statement. The least positive was around walking. The least positive statement was around respondents not feeling safer using public transport in the area. 26% of respondents said they did not feel safer on public transport in the area however the majority stated that there had been no difference in this area since the scheme was implemented. The most negative response was for the statement about through traffic with 19.4% of respondents living in the consultation area stating that they had seen an increase in traffic cutting through the area as a result of the scheme.



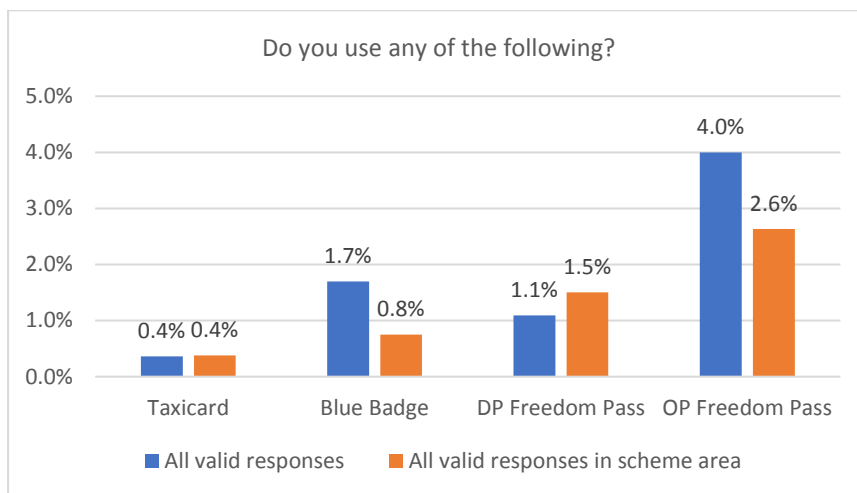


Travel Survey

Survey respondents were asked whether they used any of the following travel schemes?

In total 51 survey responders said that they use one or more of the following travel schemes: Taxicard; Blue badge; DP Freedom Pass; OP Freedom Pass and some responders made use of more than one of these schemes. This represents 6.1% of

all survey responders. Eleven survey responders said they use one or more of the above-mentioned travel schemes representing 4.1% of survey responders in the consultation area.



There was a 50/50 split between respondents in the consultation area using one of the travel schemes mentioned above in terms of their support for Option 1 or Option 2. Seven supported Option 1 and seven supported Option 2.

Equalities Analysis

Ethnicity

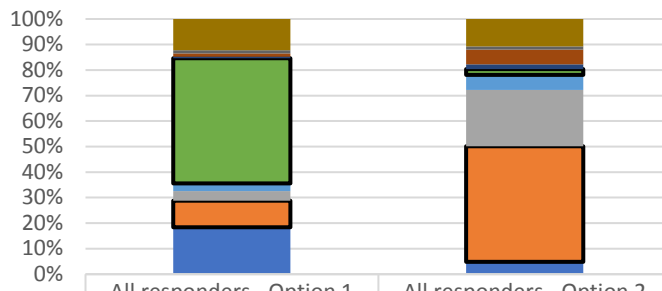
38.4% of all valid responses came from people who described themselves as White British. 5.3% of White British responders voted for Option 1 and 94.7% supported for Option 2.

Responders from Asian or Asian British: Bangladeshi backgrounds accounted for 11.5% of all valid responses. 84.2% of Bangladeshi responders supported for Option 1 and 15.8% voted for Option 2.

Looking at responders from the consultation area, 28.9% came from people who described themselves as White British, and 28.1% came from Asian or Asian British: Bangladeshi backgrounds. 6.4% of White British responders from the consultation area supported Option 1 compared to 89.3% of Asian or Asian British: Bangladeshi responders.

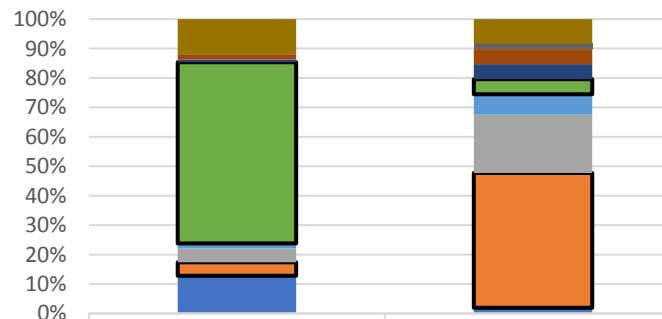
The table below show the proportion of total valid responses received by ethnicity and support for each option.

Responses by Ethnicity (all valid responses)



	All responders - Option 1	All responders - Option 2
■ Prefer not to say	12.3%	10.7%
■ Black or Black British: All	1.2%	1.2%
■ Mixed/Dual Heritage: All	1.2%	5.9%
■ Other Ethnic Groups: Any other background	0.6%	1.8%
■ Asian or Asian British: Bangladeshi	49.1%	2.3%
■ Asian or Asian British: all other	3.1%	5.9%
■ White: all other	3.7%	22.1%
■ White: British (English, Scottish, Northern Irish, Welsh)	10.4%	45.3%
■ Did not answer the question	18.4%	4.8%

Responses by Ethnicity (all valid responses in scheme area)

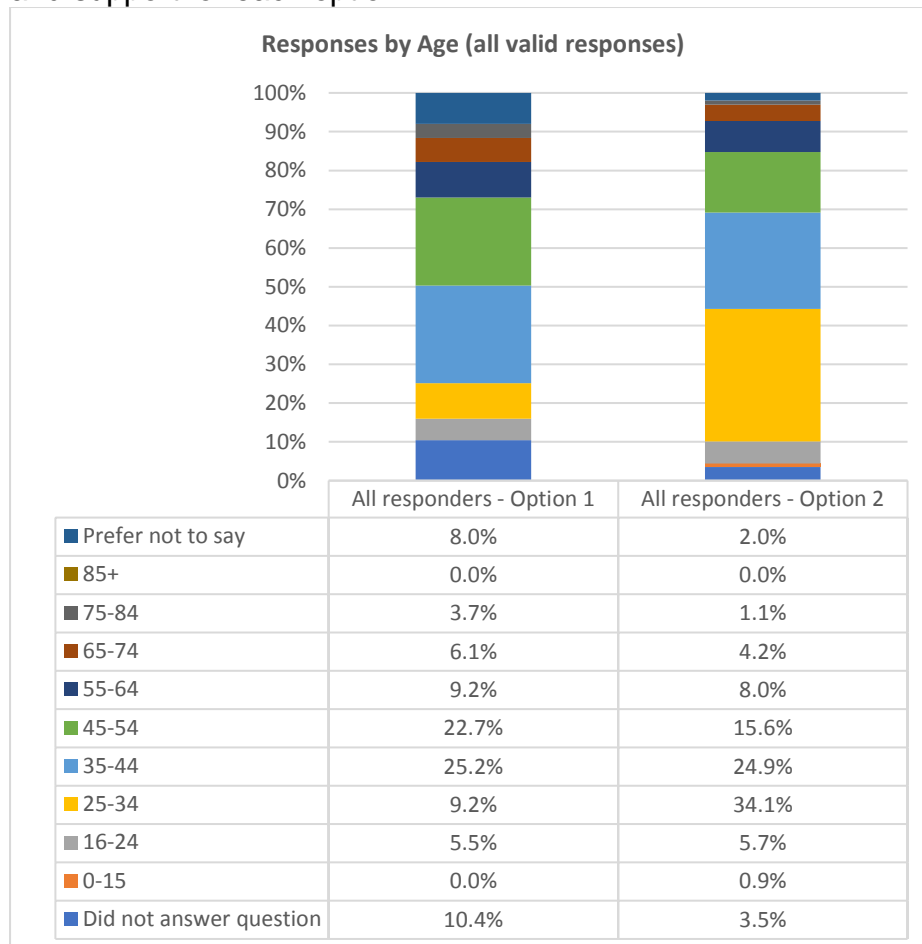


	All responders - in scheme area - Option 1	All responders - in scheme area - Option 2
■ Prefer not to say	11.9%	8.3%
■ Black or Black British: All	0.0%	1.9%
■ Mixed/Dual Heritage: All	1.8%	5.1%
■ Other Ethnic Groups: Any other background	0.9%	5.1%
■ Asian or Asian British: Bangladeshi	61.5%	5.1%
■ Asian or Asian British: all other	1.8%	7.0%
■ White: all other	4.6%	19.7%
■ White: British (English, Scottish, Northern Irish, Welsh)	4.6%	45.9%
■ Did not answer the question	12.8%	1.9%

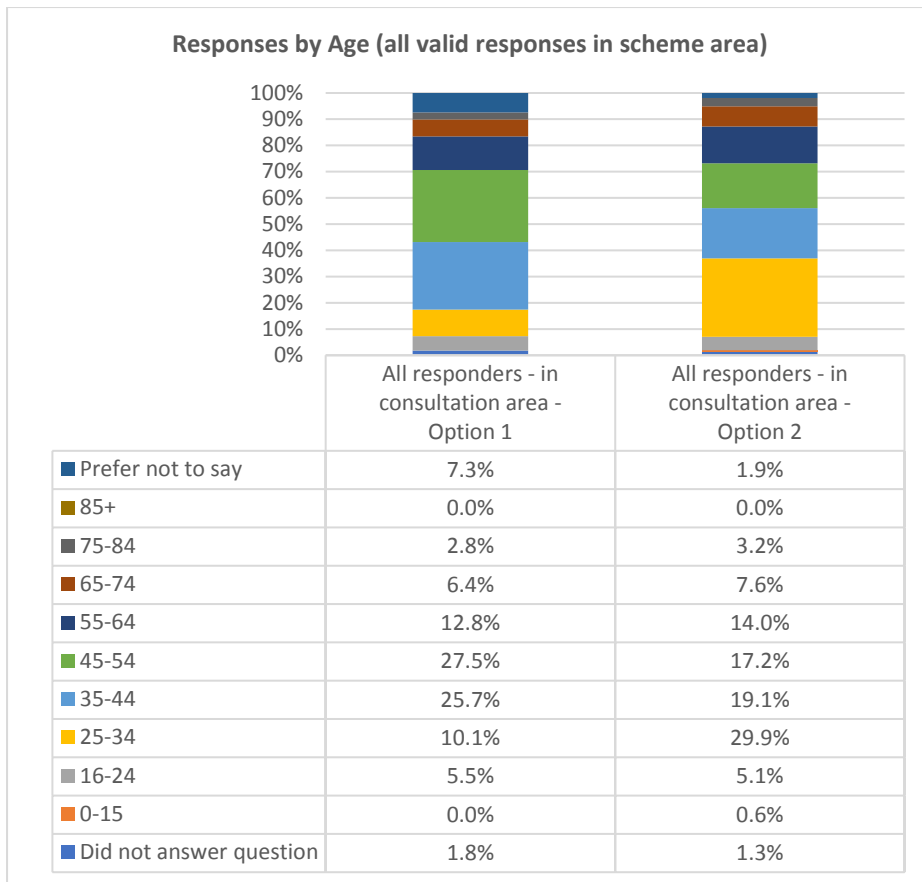
Age

The majority of respondents are of working age. There is a higher proportion of respondents of working age that support Option 2. A higher proportion of older respondents support Option 1. The age ranges with the most respondents are 25-34 and 35-44 years; these age ranges are more likely to be parents than other age groups. Around 14% of all respondents are aged 55 and over; this age range is more likely to have a disability or mobility issues than other age ranges.

The table below show the proportion of total valid responses received by age range and support for each option.



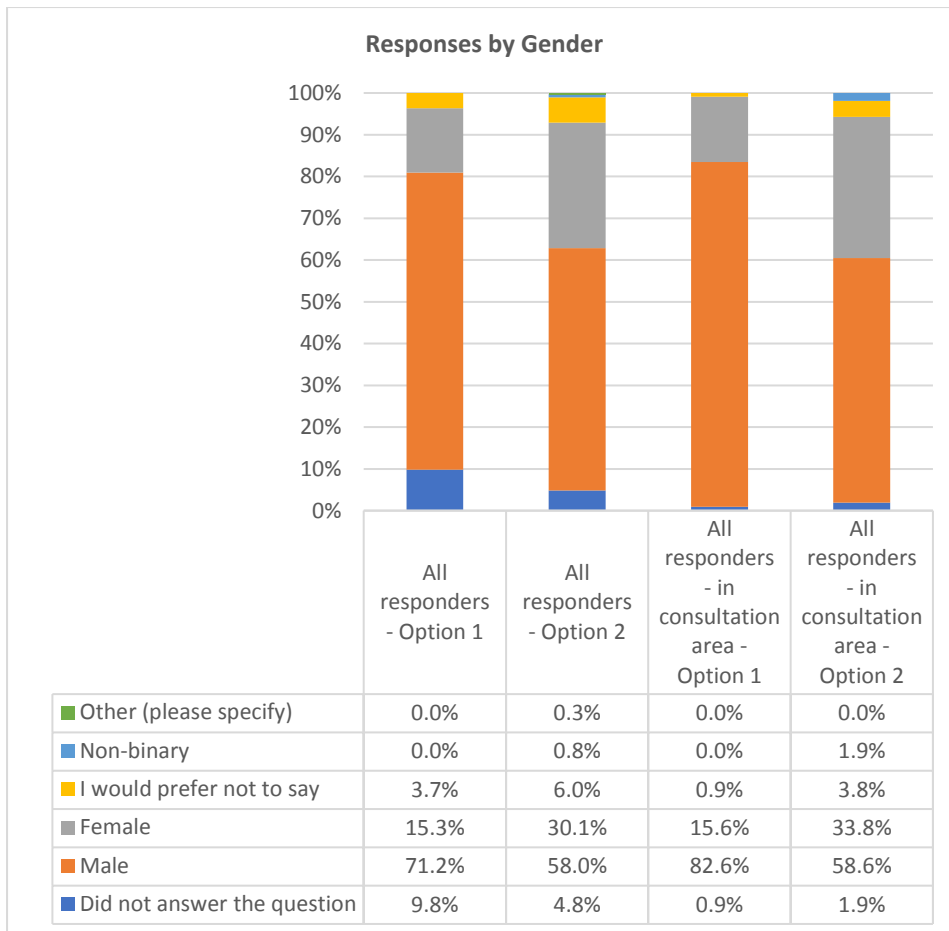
There was a slightly higher proportion of respondents in the consultation area supportive of Option 1 in the 45-54 age group compared to Option 2. For all other age groups, the proportion that were in support of Option 2 was higher than the proportion in support of Option 1.



Gender

Survey respondents were asked which best describes their gender. There were more male survey responders than female (60.6% compared to 27.1%). Of all responses received, there was a higher proportion of males supportive of Option 1 compared to females. responders were more supportive of Option 1 females. In the consultation area, 49.5% of males respondents supported Option 1 compared to 24.2% of females.

The table below show the proportion of valid responses received from responders living in the scheme area by gender and support for each option.



Gender same as registered at birth

99% of all survey respondents said that answered this question stated that their sex was the same as registered at birth. 14.6% of all respondents either did not answer the question or said they would prefer not to say, and 1% said their sex was not the same as registered at birth. For respondents in the consultation area, the proportions are the same.

Sex registered on birth certificate

The responses for this protected characteristic for male and female are comparable to the question about gender. No survey respondents said they were intersex.

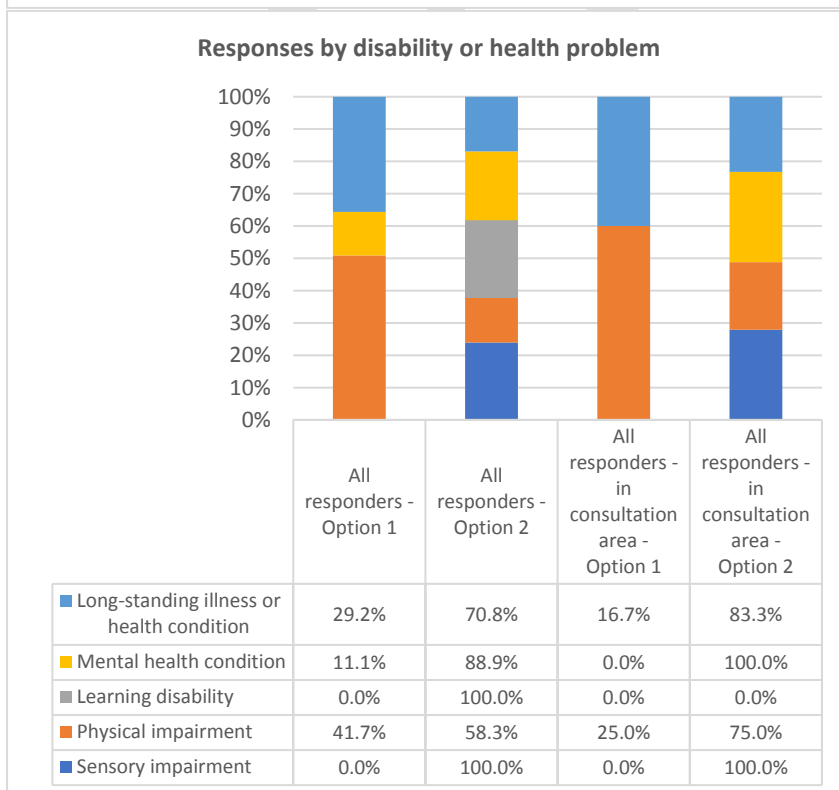
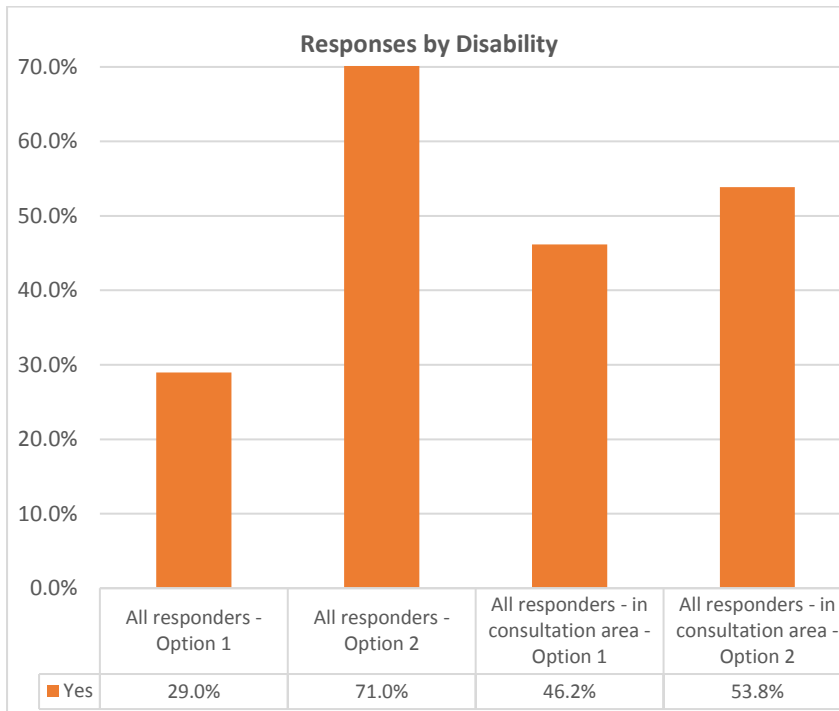
Disability

69 (8.3%) of all respondents and 26 (9.7%) respondents in the consultation area said yes when asked are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months (include any problems related to age).

Respondents with a disability or long-term health condition were more in favour of Option 2 than Option 1. Respondents were asked to state the type of health problem(s) or disability(y/ies) that applied to them.

Of the respondents who stated they had a disability, 34.7% of all respondents said they had a long-standing illness of health condition and 17.3% of all respondents said they had a physical impairment.

Respondents were asked to state which health problem or disability applied to them. The majority of respondents across all categories were more supportive of Option 2 than Option 1.

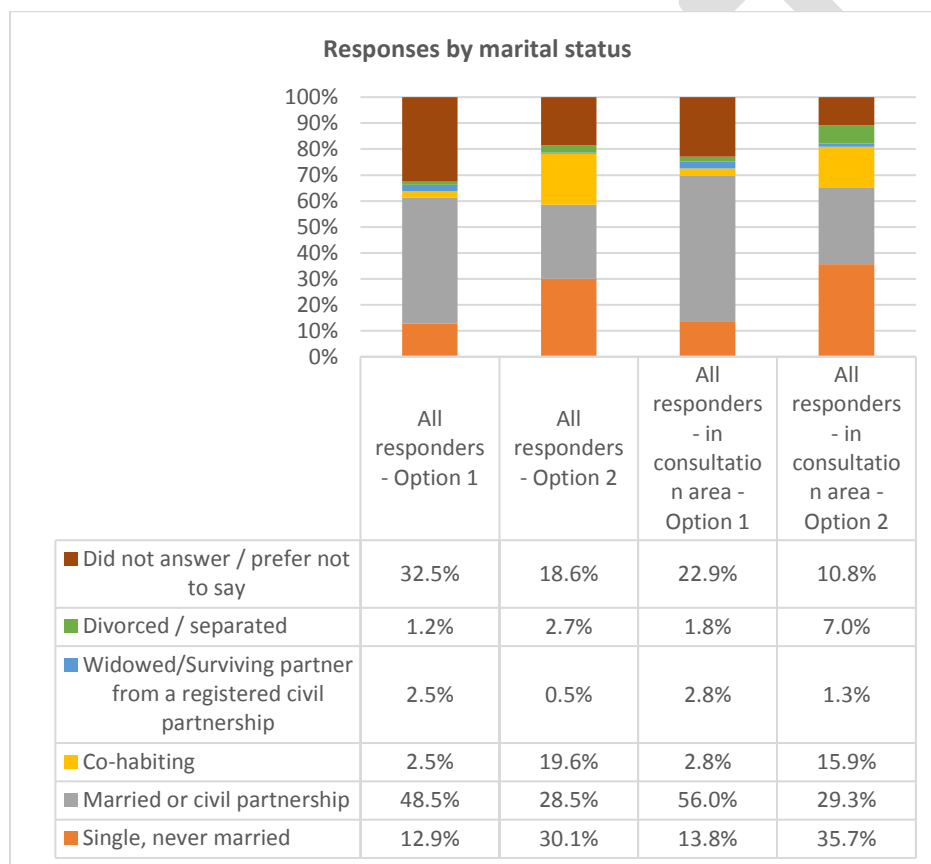


Marital Status

32.4% of all survey responders said they were married or living in a civil partnership, with 29.5% of this group supported Option 1 and 70.5% supporting Option 2. 26.7% of respondents said they were single, never married. 9.5% of all survey responders who said they were single, never married supported Option 1 and 0.5% supported Option 2.

40.2% of respondents within the consultation area said they were married or living in a civil partnership; 57% of this cohort supported Option 1. All other survey respondents were more supportive of Option 2.

The table below show the proportion of valid responses received from responders living in the scheme area by marital status and support for each option.



Religion

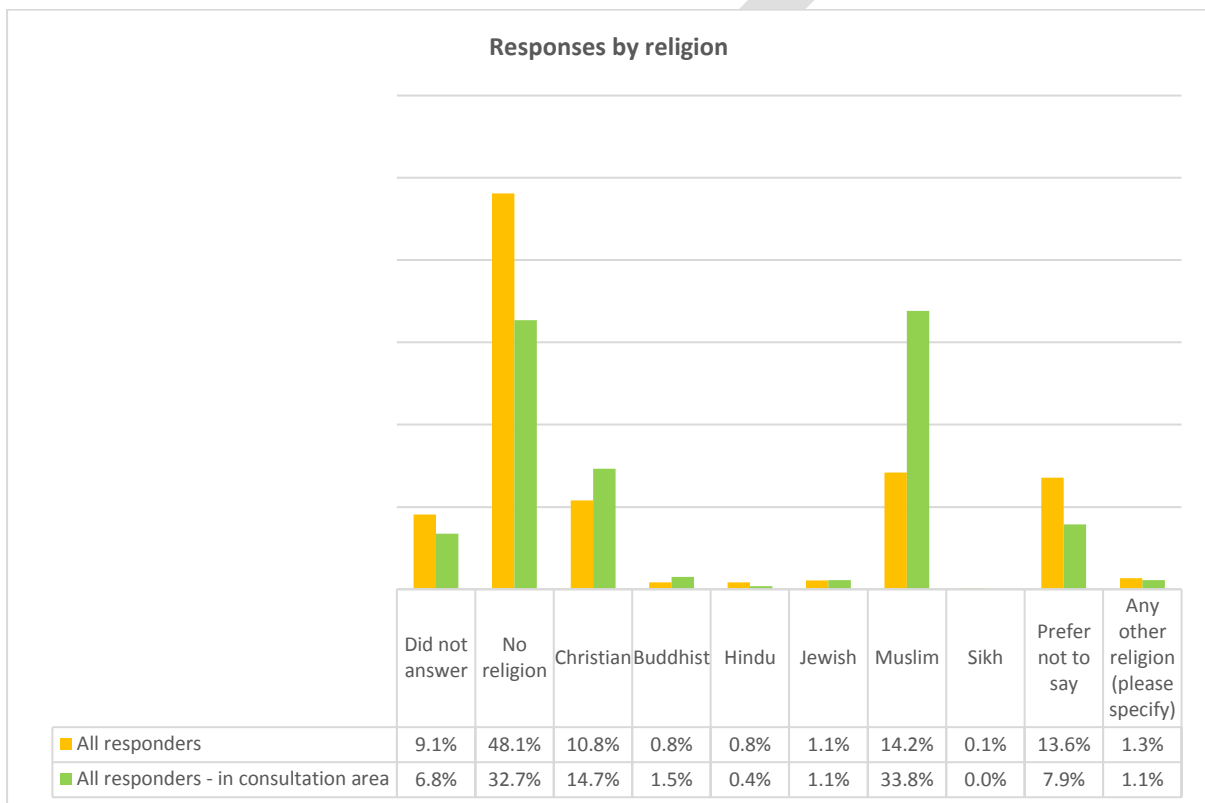
584 respondents stated they had no religion, or preferred not to say, or did not answer this survey question, equating to 70.8% of all responses received. The majority of these responders supported Option 2.

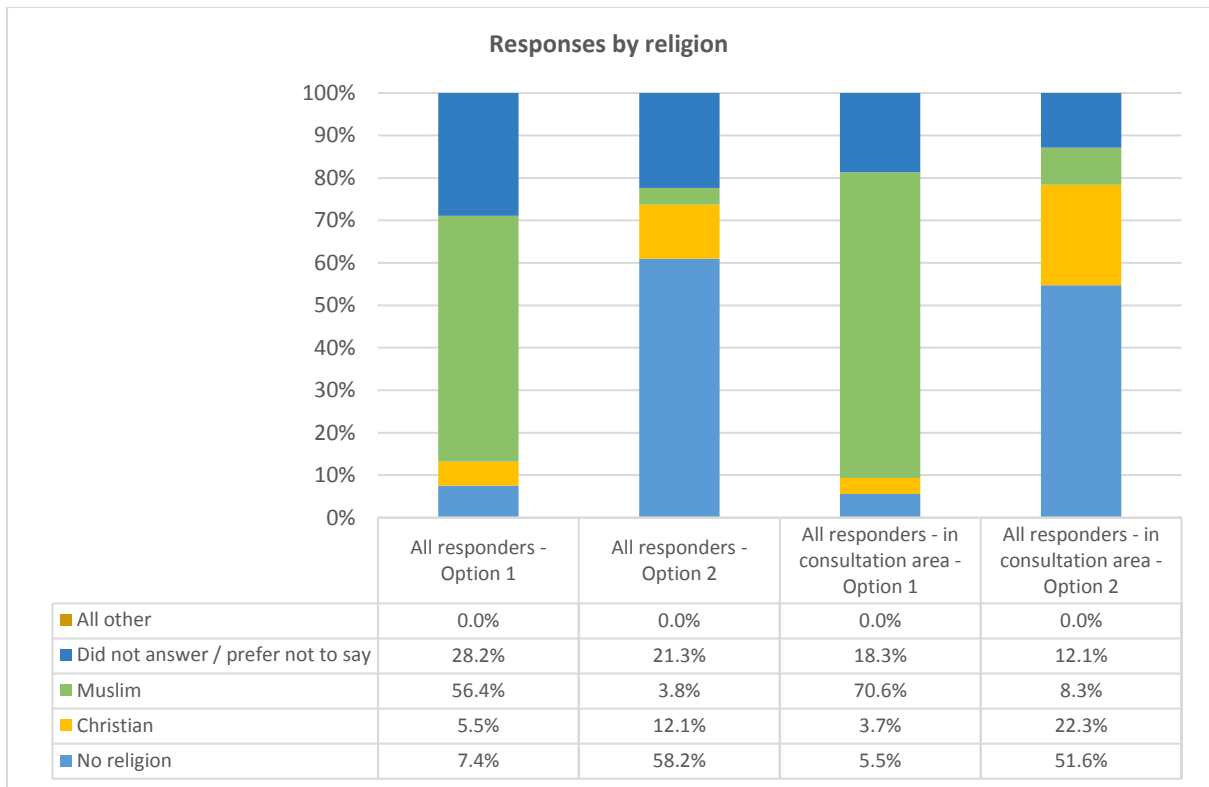
The next highest group was from respondents who said they were Muslim. There were 117 Muslim respondents, equating to 14.2% of all responders. 78.6% of this cohort supported Option 1, and 21.4% supported Option 2. The third highest group was from residents who said they were Christian. 89 survey respondents said they

were Christian, equating to 10.7% of all respondents. Overall, Christian respondents were significantly more likely to support Option 2 (89.8%).

Mirroring the responses of all respondents, the majority of responses from respondents from the consultation area said they had no religion, or preferred not to say, or did not answer this survey question (47.3%). The next highest group was from respondents who said they were Muslim, equating to 33.8% of respondents. 85.5% of Muslim respondents supported Option 1. 14.6% of this cohort said they were Christian, and the majority supported Option 2 (89.7%).

The table below show the proportion of valid responses received from responders living in the scheme area by religion and support for each option.

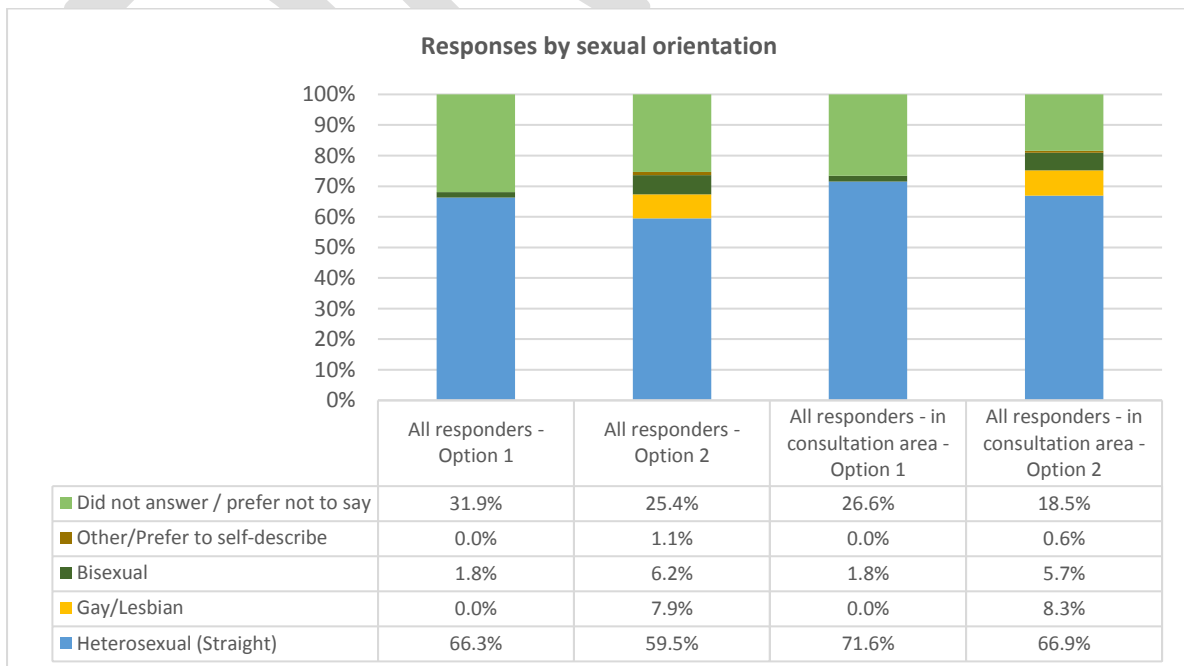




Sexual Orientation

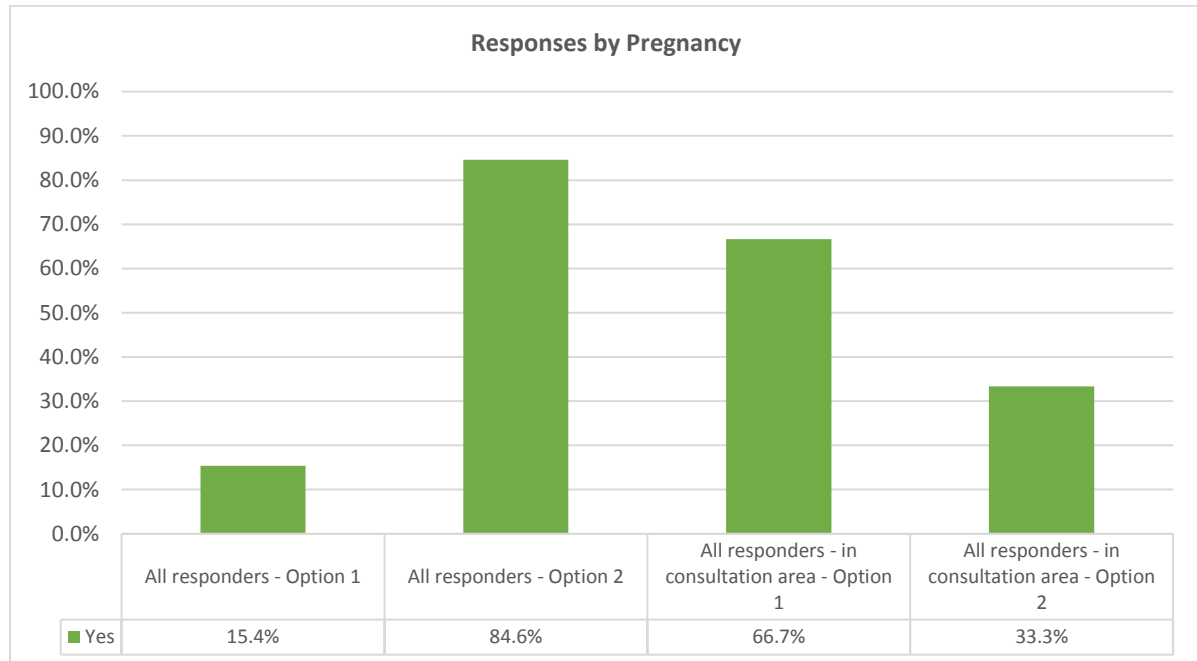
82.9% of all survey respondents who answered this question identified as heterosexual / straight. The vast majority of LGBT respondents supported Option 2 (96.8%).

The table below show the proportion of valid responses received from responders living in the scheme area by sexuality and support for each option.



Pregnancy and Maternity

13 or 1.5% of overall survey respondents said they were currently pregnant or had been in the past year. Of those the majority were more supportive of Option 2 than Option 1. The number of respondents from the consultation area who said they were pregnant or on maternity leave was three.



Comments from respondents with a disability or long-term health condition

90 comments were provided by survey responders with a disability or long-term health condition.

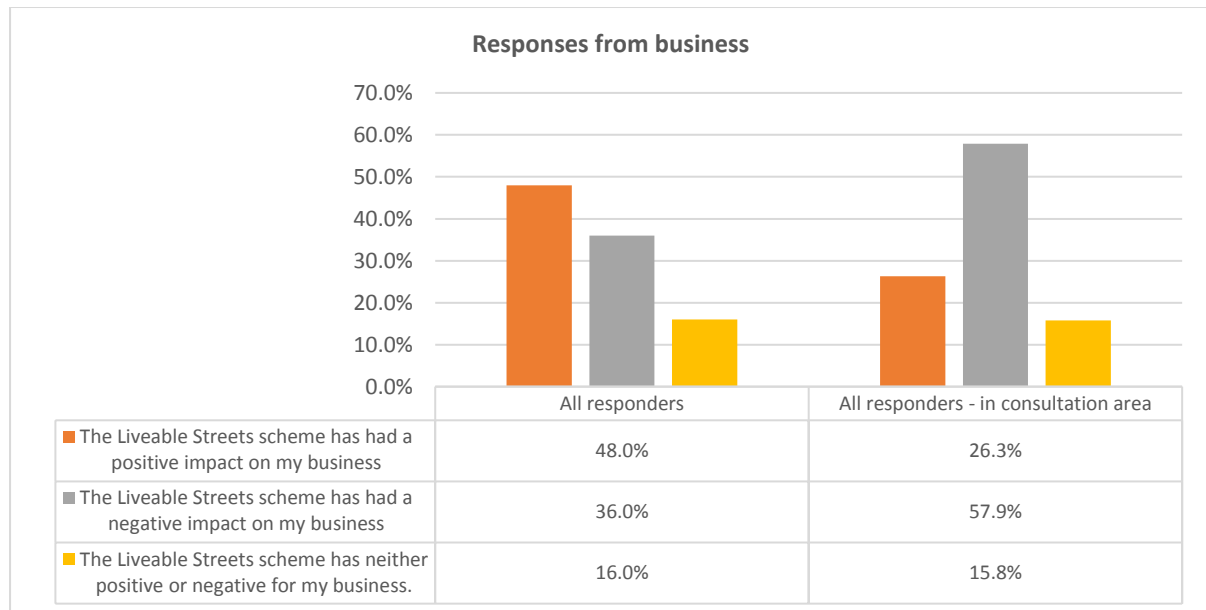
11 comments were provided by respondents with a disability or long-term health condition who supported Option 1. Their comments referred to the following themes. Received fines because of not noticing time constraints; takes longer to travel to appointments; cost of travelling to hospital appointments have increased due to difficulty getting round LTNs; have a mobility issue and have been hit by cyclists riding wrong way and speeding; more crime, more traffic, more pollution due to traffic congestion.

12 comments were provided by respondents with a disability or long-term health condition who supported Option 2. Comments referred to the following themes: Feeling safer for both pedestrians and cyclists; area feels more welcoming; better for mental health; better air quality; better for future generations; resident with long-term health condition can get out more; lung condition improved since closure; less crime, ASB, congestion, illegal parking; easier to shop in the area.

Comments from business respondents

The consultation asked respondents whether they were responding as a business or owner of a business in the area. 50 of all survey respondents answered yes, when answering the question *are you responding as a business or owner of a business in the area?* representing 6% of overall respondents. 19 respondents from the consultation area answered yes to the same question (7.1% of all respondents in the consultation area).

The majority of all business responders who felt that the scheme had a positive impact on their business. Conversely, the majority of business responders within the consultation area felt that the scheme has had a negative impact on their business.



22 survey respondents who said they were from a business provided comments.

8 comments came from survey responders that said they were a business owner were supportive of Option 1. Comments were on the following themes: Closures divert traffic down longer routes leading to more traffic congestion; adversely affects vehicle access to business / deliveries; couldn't provide access to contractor; worse for pedestrians, workers, drivers and those living in area; feels less safe; noisier.

14 comments came from survey responders that said they were a business owner were supportive of Option 2.

Comments were on the following themes: more footfall; considering expanding which would not be done if closures are reversed; more pleasant meeting clients without traffic noise; walking more pleasant; cleaner air; less danger; better for tourism; nicer environment for walking and cycling; have made use of carbon neutral cargo bikes.

Comments from respondents with a disability or long-term health condition – all

8 comments were provided by respondents with a disability or long-term health condition who supported Option 1.

- I've failed to notice the timings and on several occasions had to pay a PCN to return to my home - many fines - horrible - Evil - I have difficulty walking - You have made my life hell! And most of the community hate your Liveable Streets
- It is more difficult to access my home, and it takes longer for Mr to travel to and from my appointment
- The closure of traffic to parts of Brick Lane is very problematic to people who rely on their car in order to get around for their everyday needs. It is personally impacting myself and other family members due to our mobility problems, the main reason why we need to travel by car.

The safety issues are evident as attempting to walk down Brick Lane when the streets are swamped with people, many of whom are very intoxicated, can feel very unsafe for pedestrians who have mobility issues and may be unstable in their footing. The crowds that the road closures attract are sometime quite hostile seeming to local residents just trying to get around in their neighbourhood.

- Liveable Street scheme has been a nightmare for me. I am registered disabled and it has been a misery.
- Please leave vehicle access open.
- Commuting around Brick Lane is difficult especially when cyclists ride the wrong way down the road. I have been hit by a cyclist speeding down the wrong way (southbound) after closures were implemented. It is not a nice feeling. I also have mobility issues so the collision further compounded my issues.
- Brick Lane is now suffering from greater drug use than ever before. Cyclists also ride down Brick Lane the wrong way so they frequently come into contact with pedestrians crossing the road who expect traffic to be coming from the South and not the North.
Brick Lane is quieter than before which makes criminal activity more brazen. I have, from my office window, witnessed a person tampering with an ATM in daytime only for the police to not attend.
- Due to the closures journey times and congestion have increased, traffic pollution has increased due to congested and standstill traffic, which then spreads to the rest of the area so in my opinion these schemes make pollution worse.

29 comments were provided by respondents with a disability or long-term health condition who supported Option 2.

- because of the cameras, the following below has impacted.
 - Less crime
 - reduction in illegal parking
 - less drugs dealing, although gangs are still about
 - less Asbos
 - less congestion of traffic
- I am not a business man i can't give you any comment.
- The street closures have improved the character and safety of the area. Without the closures, pedestrians need to cram on the pavements while a small number of cars race up and down the street.
- It's safer to get around and there are more people visiting local businesses. I think we should close more roads and prioritise walking and cycling
- more of a tourist destination. easier for people to wander safely around the area. Friends have said the area feels more pedestrian friendly.
- Easier for my husband who is disabled to get around and ASB has greatly reduced
- It's been a remarkable improvement to Brick Lane - far more pleasant to walk through, fewer cars clogging up the streets (that often park or drive incredibly

dangerously). The air quality is better, and I feel safer walking down what are fairly narrow streets anyway.

- Brick Lane does not have the space or infrastructure to allow cars as well as everyone else. You need to focus on pedestrians as much as possible. I understand the importance of accessibility and the businesses' requirements but we are entering an age of climate crisis. We NEED to move away from a dependence on cars and vehicles and for those who use a car in central London when it is not necessary, they are actively harming the area. There is not the space on the side of the streets when cars come down. I also think Hanbury Street should be entirely pedestrianised or traffic laws better enforced there. The speed at which people take the corner round from Brick Lane into Hanbury Street, by Enso Lounge, is horrific. I have nearly been hit so many times. Think of the future! We should be able to feel safe and catered for walking in our local area. Get rid of the vehicles and take away parking spaces, The vast majority of the population do not need a car - save the spaces for those who cannot get around without them!
- Brick Lane was a nightmare for traffic. I find it hard to believe the Liveable Streets scheme is proposed to be removed. I used to hate having to go anywhere near the location and would detour to avoid. I only live a street away. It is so much easier to visit Brick Lane now.
- Please introduce speed signs. Cars speed all along brick lane resident streets. Brick lane has access to 6 primary schools and more nurseries. You need to make it safe for children on school walk. Clean up the dog mess
- There has been no noticeable change as such, but support retention for symbolic reasons.
- Brick Lane should be closed to traffic 100% of the time.
- Brick lane is quite clearly a vibrant high street with very high pedestrian food traffic. Space is at a premium and your plan to prioritise access by car at all time is maddening. Please don't remove any of the current closures
- It's brilliant. I shop in Brick Lane far more than I ever used to.
- I strongly support option 2 and am firmly against reopening roads - that would cause: more pollution, more noise, and be more dangerous for residents, visitors and children. It also ruins the atmosphere of Brick Lane and surrounding area which is famed for its shops and attracts many visitors - heavy traffic loads reintroduced to the area will be a massive detriment. I am physically disabled with acute mobility issues but I am happy with the current set up as I value community over the need for roaring traffic. It is very disappointing that this could even be up for consulting, having only consulted on it recently. Everyone benefits from cleaner, quieter streets - so I firmly oppose the reopening of roads.
- It is beyond ridiculous that you are proposing to remove the traffic closures on Brick Lane. Do you ever actually spend any time on Brick Lane? I live here and I walk up and down Brick Lane and the streets that run off it every single day. The pavements are already too narrow to be safe for pedestrians, particularly at weekends. We already have to walk in the middle of the road despite there being cars and motorbikes driving up behind us. It is wildly unsafe as it is. It makes absolutely no sense to make it even less safe. This will also damage businesses on and around Brick Lane. They rely on pedestrian footfall, not cars. Why are you trying to do something that will harm our community, all for the sake of the vested interests of a small number of rich car drivers and taxis? Yes, some people with disabilities will need access via car (I am disabled myself by the way). It is entirely possible to meet that need without causing such unnecessary damage to our community by making Brick Lane even more unsafe and inaccessible for pedestrians. Truly, this proposal perfectly illustrates the incompetence and corruption of the officers and the councillors at Tower Hamlets. What a joke you all are.

- It is unequivocally more pleasant to live in the area since the closures/ The decrease in delivery vans using streets as cut-throughs with no regard for those who live here has been wonderful. I would like to acknowledge the potential adverse effect of the closures on those with disabilities, but would suggest the solution lies with increasing the general accessibility of the area - not reversing the closures.
- It is very difficult as a pedestrian to use Brick Lane when it has traffic on it, the closures have really helped to make it a n easier place to spend time in and travel through. If there are issues with how the closures have been implemented they should be kept and improved rather than reversed. The council has an obligation to encourage active travel and the proposal to remove these schemes does the opposite.

As someone with disabilities who can only travel a limited distance from my home, the improvements have significantly improved my quality of life.

- It is notably nicer in the area and definitely more accessible by tourists and the public alike. The closures have obviously benefited Brick Lane in a multitude of different ways.
- The area is so much more pleasant to walk and shop in. Coffee shops I frequent often in the area have a lot more organic foot traffic which improves the atmosphere. Sitting outside is more pleasant because of the improved air quality. Walking pets in the area is also much safer.
The road closures don't block all roads for cars all day every day so travelling by taxi when needed is no problem at all, so the Liveable Streets scheme has only brought positives in my opinion.
- It has improved immeasurably and feels much better and safer than it used to. The streets are cleaner and air pollution has reduced.
- I have worked in Tower Hamlets for more than 16 years and only see more and more dangerous driving, only the Liveable Streets measures have gone anyway to changing this.
- The limited camera closures have made some difference, however they are far from adequate. Brick Lane feels really unsafe to walk along - the pavements are very narrow, so you end up having to walk in the road, and then threatened by drivers who use the road. I have been nearly knocked over on Brick Lane on several occasions. Such a street - with many restaurants - in any other city would almost certainly be completely pedestrianised (including not allowing cycling). At the moment, the poor safety on the street puts me off coming to the lane at all for any purpose.
- although limited camera closure have improved things slightly more needs to be done
- The street is narrow and very busy with pedestrians all week. The road should be pedestrianised
- The Liveable Streets scheme has made the area safer and more convenient. Brick Lane is an important destination in the borough and making it less safe to walk makes it less attractive for the hundreds of thousand visitors a year. Furthermore as a resident of the borough, I use Brick Lane to get to work and local shops multiple times as week both on foot and on bike. The area is just so much more attractive with reduced motor vehicle traffic. Speeding is a major problem across the borough, so separating vulnerable road users from dangerous motorists is absolutely vital.
- I've found it much more pleasant to cycle and walk in the area. The local businesses are definitely getting more of my business, since its much more convenient to go there, and I often pass through on my way, instead of going the old way,, but much longer.
- I cycle regularly with my family to restaurants and shops and it's now safer.
- Why promote car use? It's divisive and awful.

Comments from business respondents – all

17 survey responders said they were a business owners supporting Option 1.

- Getting access to move around was a major issue with many unnecessary road closures.
- My business is on Commercial Street so we are not impacted by these measures. But I live on brick lane so walk down it daily and occasionally need to drive up brick lane.
- The current road closures divert vehicles down longer routes along more of the side roads. Some of those side roads have more residential properties and are also very narrow (Woodseer Street in particular). This unfortunately leads to more traffic and congestion along those side roads making them less liveable for people living on them and for businesses trading on them. In addition the road closures unfortunately adversely affects vehicle access to my business, with no mitigation measures having been provided despite having engaged in a lengthy and involved period of engagement on those effects and potential mitigation measures.
- Could not provide the access to site to a contractor coming for a site visit
- The changes made have made it worse for both work, pedestrians, drivers and those living in the area.
- The area is less safe, both pedestrians and drivers I've spoken with have expressed concerns. Those living in the area have also described the negative impacts
- The increased traffic had caused a nice quiet area to become noisy and unsafe.
- Getting deliveries customer coming with the cars is so difficult at weekends, especially for people coming from distance, people are worried to calm down so we are losing customers on BRICKLANE.

32 survey responders said they were a business owners supporting Option 2.

- More foot traffic
- My business is largely unaffected by the closures, but the area has more shoppers and people visiting local businesses and I am now considering applying for a market stall on Brick Lane to expand my business. However, I am unlikely to do this if the road closures are reversed
- Being able to walk on brick lane to meet clients without traffic noise and avoiding cars has made it much easier for me and my clients.
- Less cars in the area make cleaner air and less dangerous for my clients and others
- I run a bed and breakfast and clients have commented on how much better a low traffic neighbourhood is for tourism
- I work in the area as well as I'm a resident and I prefer the street to be close to traffic it's safer when I'm with my kids
- It has been easier for me to go around as I travel to all my business meetings by bike and it
- is also easier for our customer to visit the area
- Our employees enjoy a better environment walking to and from the office as well as on lunch breaks. We do not have a car and use public transport so walking and cycling has become a lot easier.
- My business is online, it does not have a physical storefront. However with cleaner air, it's easier to keep my home office window open for fresh air or go for a walk. Still way too many old polluting diesel vehicles on the road, but that's a separate issue.
- We use carbon neutral cargo bike based transport to get around the borough, without Liveable streets, it wouldn't be possible.

- It is notably nicer in the area and definitely more accessible by tourists and the public alike. The closures have obviously benefited Brick Lane in a multitude of different ways.
- easier to move around
- We have more than 60 colleagues based in Bethnal Green, none of them drive to work yet all of them suffer the pollution and danger of drivers around the office.
- I can walk to work in clean air, safer cycle deliveries, online business

DRAFT

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<p>Cabinet</p> <p>20 September 2023</p>	 <p>TOWER HAMLETS</p>
<p>Report of: Raj Mistry, Interim Corporate Director, Communities</p>	<p>Classification: Unrestricted</p>
<p>Tower Hamlets Reduction and Recycling Plan 2023-2025</p>	

Lead Member	Councillor Kabir Hussain, Cabinet Member for Environment and the Climate Emergency
Originating Officer(s)	Simon Baxter, Interim Director Public Realm Fiona Heyland, Environmental Services Improvement Manager Louise Houston, Environmental Services Improvement Team Leader
Wards affected	All wards
Key Decision?	Yes
Reason for Key Decision	Significant impact on wards
Forward Plan Notice Published	23 May 2023
Strategic Plan Priority / Outcome	Strategic Plan 2022-26 Priority 7: A clean and green future

Executive Summary

This Reduction and Recycling Plan for 2023 to 2025 is the first phase of ambitious plans to deliver a clean and green future for Tower Hamlets. We are committed to delivering improvements over the next 5 years, with initial investment in service re-design, service delivery and community engagement.

Our plans to optimise recycling collections, deliver over £2million in flats recycling improvements and develop improved communication and community engagement are just the start. We are working alongside other local authorities and recycling experts to pilot collecting food waste on housing estates, to improve recycling from people living in flats above shops and to create more leverage from community engagement.

Taking lessons learnt, we plan to drive measurable behaviour change with the help of support from landlords, community groups, faith groups, local mosques, local media and the business community.

This forms an important part of our commitment to become a net zero carbon council by 2025 and net zero carbon borough by 2045 or sooner. In addition to demonstrating how we contribute to delivering improvements as part of the London Environment Strategy.

Developing and producing a Reduction and Recycling Plan (RRP) is a requirement set by the GLA to ensure all London authorities are in general conformity with the London Environment Strategy. This latest RRP comprises environmental metrics drawn from the previous reporting cycle (2018-2022) along with a cross-cutting action plan drawn from our Strategic Plan and Tower Hamlets Waste Management Strategy. This second RRP covers a two-year period from April 2023 to the end of March 2025 and sets out our ambition to achieve a 23% recycling rate.

Review of recycling performance highlights the impact of low recycling capture from our residential properties, that 22% of a typical rubbish bin contains recyclable material and that in many cases lack of available recycling bins or storage capacity for recycling is a barrier to people recycling more.

To achieve our 23% target, we need to take more direct steps to get an extra 6,800 tonnes of recyclable material out of waste bins and into recycling bins, or bags each year.

Key Initiatives within our RRP include:

- Recycling route optimisation to deliver more efficient and effective collections from all households.
- Over £2 million investment, to roll-out of flats recycling improvement project across 2160 blocks of flats.
- Focus on making sure people have access to recycling bins and bags.
- Re-focused communication campaigning to leverage more community engagement and behaviour change. To work with community groups, faith groups, schools, mosques and local media to increase waste reduction, re-use and recycling activity in all households.
- Collaborating with landlords and housing providers to obtain direct support and investment in communication, tenant behaviour change and infrastructure to improve recycling and reduce contamination.

Delivering on the actions within our RRP will generate extra cost and budget pressures to be managed in 2024/25. This is due to high inflation adding to the cost of recycling and delays in funding support from government recycling reforms.

1. REASONS FOR THE DECISIONS

- 1.1 The council is committed to helping people to reduce waste and reuse and recycle more to deliver a clean and green future for Tower Hamlets. Drawing together our service, communication, education and behaviour change activities into one plan helps to demonstrate this commitment.
- 1.2 Developing and producing this RRP is also a requirement set by the GLA to ensure all London authorities are in general conformity to the London

Environment Strategy. This second Tower Hamlets RRP covers the two-year period April 2023 to March 2025.

- 1.3 The Mayor of London expects the RRP to be signed off at Cabinet level before general conformity with the LES is confirmed by the GLA.

2. ALTERNATIVE OPTIONS

- 2.1 The RRP set out in Appendix 1 incorporates a range of activities and actions that will enhance recycling services and encourage greater participation in reuse, recycling and waste minimisation activities to achieve the recycling target set for the end of the plan period.
- 2.2 The council has ambitious plans to deliver a cleaner and greener future for Tower Hamlets beyond the period of the current RRP. We expect to continue with investment in service improvement, waste reduction, re-use and recycling beyond the current RRP timeline. This forms an important part of our commitment to become a net zero carbon council by 2025 and net zero carbon borough by 2045 or sooner.
- 2.3 The Mayor in Cabinet could decide not to agree the RRP. This option is not recommended as it would leave the council open to challenge by the GLA for not being in general conformity with the Mayor of London's Environment Strategy.

3. DETAILS OF THE REPORT

Waste and Recycling in Tower Hamlets

- 3.1 Tower Hamlets Council is a Unitary authority, responsible for dealing with both collections and disposal of municipal waste. Our Waste Management Strategy 2018–2030 was adopted in 2019 with the central aim to move more waste up the waste hierarchy by helping residents to reduce waste, reuse and recycle in line with the principles of a more circular economy. In July 2021, Tower Hamlets adopted the Reuse, Recycling and Waste Supplementary Planning Document (SPD), setting the council's expectations for the provision of suitable storage and collection systems for new developments. That facilitate and encourage greater reuse and recycling of household waste.
- 3.2 Waste and recycling collections services have been delivered in-house since April 2020 and currently provides the following:
 - Recycling - weekly collection of comingled recycling to all residents in kerbside properties, flats and flats above shops.
 - Food and Garden - weekly collection of food and garden waste to residents in kerbside properties, with a limited trial of weekly separate food waste collections for 870 purpose-built flats.
 - Residual waste - weekly collection of residual waste to residents in kerbside properties predominantly via sacks, and flatted properties using communal bins with varying collection frequencies.

- A commercial waste collection service for residual waste and co-mingled recycling.
One Reuse and Recycling Centre (RRC) in the borough operated and managed, on behalf of the council, by Cory.
- 3.3 With the high number of flats and maisonettes in Tower Hamlets (88%) coupled with communal bin collections, Tower Hamlets faces unique challenges for a London borough. These factors make achieving high recycling rates, reducing contamination in dry recycling and introducing waste improvements particularly difficult.
- 3.4 Tower Hamlets is the most densely populated borough and has the fastest growing population nationally. It has seen a 7% increase in total number of households between 2011 and 2021, the largest of any local authority area across England and Wales. Service resources and infrastructure for recycling at newly built blocks of flats has not kept up with this growth, and the amount and quality of materials collected for recycling has suffered.
- 3.5 We have invested over £3 million in improvements to flats recycling since 2018/19 with additional investment in new collection vehicles, including electric vehicle trials, food waste pilots and development of a “flats recycling improvement toolkit”. Our plans to invest in recycling infrastructure and service improvement have not kept pace with the increase in waste tonnage from our rapidly growing population. The rise in people regularly working from home since the pandemic has further increased the waste generated. This RRP sets out the first phase of our longer-term plans to drive significant improvement in recycling performance from improved service design, service delivery, education, advice and behaviour change over the next 5 years.
- 3.6 Tower Hamlets baseline recycling rate for the RRP is the recycling rate for 2019/20 (21.5%). In 2021/22 the recycling rate fell to 19.7% and in 2022/23 it fell again to 17.8%. Working against the baseline rate for 2019/20 puts the council under extreme pressure to meet the target it has set in the RRP for 2024/25 of 23%. The average contamination rate in the first four months of 2022/23 was 27.95% compared to 22.01% during the same period in 2021/22.
- 3.7 It has long been understood that people living in flats don’t recycle as much as people living in houses. With the high proportion of flatted properties in Tower Hamlets, the council has previously invested in a number of activities to support residents to recycle more of their waste. However, not all of the activities have resulted in increased recycling performance.
- 3.8 We recognise the importance of making recycling sacks available for those who need them. Last year £130,800 was spent on making single-use recycling sacks freely available to take at Idea Stores. This method of distribution has not resulted in increased recycling tonnage and is currently under review. Improvements will include deliveries to all kerbside properties and flats above shops, with use of online ordering for those residents that need recycling sacks. Residents with recycling bins will be supplied with reusable recycling bags for storage and transport of recycling.

- 3.9 A research project carried out by ReLondon and Peabody Housing Association across 12 London boroughs (including Tower Hamlets) identified that the barriers residents living in flats face are many and complex. Residents need to be motivated and have sufficient knowledge to recycle, and the recycling process must be easy. All three of these interdependent conditions are needed before people change their behaviour and if any one of them is not met it will undermine the other two.
- 3.10 The results of the research project showed that most people were motivated about recycling, but their motivation was easily undermined by poor experiences and a lack of accountability. The research also showed that many people were not very knowledgeable about what materials could be recycled. Drawing on the results of the ReLondon research the council has identified a key list of interventions/actions are necessary in order to facilitate correct recycling behaviours and maximise our recycling performance. These include:
- Effective storage for segregating recycling within the home
 - Making recycling easy for residents to undertake as part of their daily routines.
 - Collecting a wide range of recyclable materials
 - Sufficient, clean and well-maintained recycling bins and bin stores with clear and visible signage
 - Regular engagement with residents to remind them about what can and can't be recycled and how to recycle correctly.
 - Promoting recycling as the social norm, through engagement with the whole community
 - Feedback mechanisms to show that residents efforts are being monitored and recognised.
- 3.11 Despite the challenges we are committed to helping people to reduce or reuse more of their waste and to increase the amount of waste that is recycled. The RRP covers actions on service improvements, increasing tonnage, reducing contamination and driving behaviour change through additional communications and engagement activities.

Mayor of London's Environment Strategy

- 3.12 In 2018, the Mayor of London declared a climate emergency, and published the London Environment Strategy (LES). The LES sets out objectives, targets, and policies to make London a zero-carbon city and accelerate London's transition to a circular economy. The Mayor's London-wide waste targets are:
- To cut food waste and associated packaging waste by 50 percent per person by 2030.

- To achieve a 65 percent municipal waste recycling rate by 2030, including a 50 percent recycling rate for local authority collected waste (LACW) by 2025
- To send zero biodegradable or recyclable waste to and fill by 2026

3.13 The relevant objectives from the LES are:

Objective 7.1 – Drive resource efficiency to significantly reduce waste focusing on food waste and single use packaging.

Objective 7.2 – Maximise recycling rates.

Objective 7.3 – Reduce the environmental impact of waste activities (greenhouse gas emissions and air pollutants).

Objective 7.4 - Maximise local waste sites and ensure London has sufficient infrastructure to manage all of the waste it produces.

Minimum level of household waste recycling service

3.14 The LES requires all boroughs to provide a minimum level of household waste recycling (LES 7.2.1a). Tower Hamlets provides all properties in the borough with a minimum collection of the six main dry materials of glass, cans, paper, card, plastic bottles and mixed rigid plastics (pots, tubs and trays). All kerbside properties have a separate weekly food waste collection. For kerbside properties the service conforms to the Mayor of London's minimum recycling collection standards. Tower Hamlets has yet to roll out food waste collections to flat properties.

The requirement for Reduction and Recycling Plans (RRPs)

3.15 The LES introduced a requirement for London local authorities to produce RRP. These RRP were to be developed at least every four years, setting out how councils will meet LES requirements, and make an effective contribution to the Mayor of London's waste targets.

3.16 London local authorities produced their first round of RRP for 2018-2022 following the publication of the LES. There is now the requirement to have a new RRP in place, which has been approved by the GLA.

3.17 Local authorities are now looking ahead to the Government's reforms being implemented under the Resources and Waste Strategy (Environment Act 2021), which will see the most significant changes to waste collection and disposal systems for a generation. The GLA acknowledges that there is still considerable uncertainty over exactly which services local authorities will be required to provide, the timescales, and the funding they will receive to support their implementation. Due to this uncertainty, the GLA has determined that the new RRP should focus on a two-year period from April 2023 to the end of March 2025.

Format, Content and Governance of RRP

- 3.18 The RRP template issued by the GLA contains five sections and is designed to act as both a useful internal reporting tool, and one that contributes to the collective understanding of London-wide impacts of borough activities and progress towards the LES's targets.
- 3.19 Sections one and two provide background information. Section three is a dashboard of current and planned performance against a set of common metrics and targets. Section 4 is an action plan documenting the activities to be carried out over the RRP period. Section five is an action plan update table, which will be completed at the end of 2023/24.
- 3.20 The GLA expects RRP to support the wider environmental policies and proposals set out within the LES. RRP actions are required to consider wider policy areas such as reduction of carbon emissions associated with waste operations, maximising air quality and vehicle LEZ/ULEZ compliance and implementing actions that integrate circular economy thinking.
- 3.21 Since the first round of RRP were submitted and following consultation with London boroughs, changes to monitoring have been made which means a lighter touch, with annual rather than six monthly updates as previously requested by the GLA.
- 3.22 The Mayor of London expects the RRP will be signed off at Cabinet level, before general conformity with the LES is confirmed by the GLA. The RRP is expected to be made publicly available.

Tower Hamlets' Reduction and Recycling Plan

- 3.23 The Strategic Plan is the Council's overarching strategy document that sets the vision and direction of travel for all services, including waste and recycling. Strategic Plan Priority 7 centres around delivering a cleaner and greener future for Tower Hamlets, with a focus on improving waste and recycling performance. The mayors Waste Management Task Force has been set up to oversee improvement in this area.
- 3.24 Further elements of Strategic Plan Priority 7 focus on mitigating climate change and becoming a carbon neutral council by 2025.
- 3.25 In addition to the Strategic Plan, the council also has a waste management strategy in place, Tower Hamlets Waste Management Strategy 2018 – 2030. The waste management strategy centres around six priorities that provide a framework for the waste and recycling services moving forward.

Priority 1 – Collaboration at the heart of change.

Priority 2 – Supporting people to love their neighbourhood.

Priority 3 - Supporting people to reduce, reuse and recycle.

Priority 4 - Making waste a resource.

Priority 5 – Reducing carbon and improving air quality; and

Priority 6 – Building our green economy.

- 3.26 Despite having the Strategic Plan and waste management strategy in place, in order to be in line with the statutory requirement set by the GLA, Tower Hamlets officers have produced the new RRP action plan to conform to their template and best practice model.
- 3.27 The RRP action plan is a cross-cutting plan, bringing together actions we are already taking (and plan to undertake dependant on funding including rolling out separate food waste collections to flatted properties, separating the collections of kerbside food and garden waste, implementing separate cardboard collections and expanding on-street recycling) with the actions being drawn from our current plans and strategies. The actions in the plan are categorised under three themes:
- Waste reduction and reuse
 - Maximising recycling; and
 - Reducing environmental impacts

Waste reduction and reuse

- 3.28 Actions focused on helping people to reduce and reuse more of their waste are becoming increasingly important from the impact of the cost-of-living crisis on individuals and the cost of delivering our services.
- 3.29 The RRP contains 8 actions focused on reducing and reusing waste. The key gains from the actions detailed in the RRP are:
- Reducing food waste – through the continued promotion of the national “Love Food Hate Waste” campaign and our own food waste reduction workshops.
 - Home and community composting – for many years we have supported residents to compost their food waste at home through the provision of reduced-price compost bins and wormeries and have provided support to a number of community composting schemes. We will continue to encourage residents to compost food waste at home where it is practicable to do so.
 - Clothes swap and repair events – in recent years fast fashion has led to increasing levels of clothes and textiles being disposed of in peoples’ rubbish. We encourage residents to look to pass on unwanted clothing items through clothes swap events, charity shops or textile banks located around the borough. We also hold workshops to help residents to mend or repurpose their clothing.
 - Reducing single use plastics – through our many engagement and education and behaviour change activities we will look to discourage the reliance on single use plastic items, many of which end up creating litter and blighting our environment.

Maximising recycling

3.30 The RRP contains 16 actions to increase recycling which will be delivered alongside or as part of our business-as-usual services. The key gains in recycling, and the diversion of material from the residual waste stream, from the actions detailed in the RRP are:

- Co-mingled dry recycling gains from households – mainly from the work we are doing on estates and at blocks of flats to roll out the Flats Recycling Package. Infrastructure improvements to increase the quantity of recycling and reduce contamination with improvements to service delivery.
- Also, from the work we have been doing to raise more awareness about recycling and recycling correctly through the “Let’s Rethink It” campaign and our many behaviour change and engagement activities.
- Co-mingled dry recycling gains from businesses – we will be encouraging more businesses to separate their waste for recycling through an improved commercial waste service.
- Expanding collections of other materials – we will be looking for opportunities to set up or expand collections of other materials including textiles, small WEEE and batteries.
- Food and garden waste gains – in the short term mainly from re-promoting the service to residents in houses who are not yet taking part in the service and re-promoting the service to schools. In the longer term through the roll out of food waste collections to flats.

Reducing environmental impacts

3.31 The RRP contains 3 actions focused on reducing the carbon impact of waste, improving air quality and driving a more circular economy. The key gains from the actions detailed in the RRP are:

- Capturing more high embedded carbon materials such as textiles
- Working with businesses to promote circular business and circular business activities.
- Greening the council’s waste and recycling fleet of vehicles

On-going communications

3.32 The ReLondon research tells us that regular and on-going communication and engagement is needed to improve recycling knowledge and maintain motivation. The RRP contains 9 actions related to communication activity. To leverage support, increase community engagement and drive behaviour change to minimise waste and recycle correctly.

3.33 The action plan also looks to address some of the expected upcoming Government waste and recycling reforms and includes targets up to 2025.

The full implications of the Government’s waste and recycling reforms will be subject to a separate report to Cabinet in due course.

Achieving improved recycling performance

- 3.34 The timeframe of this RRP plan period is short and in order to achieve the 23% recycling target by the end of the RRP period the council must be collecting an extra 6,800 additional tonnes of recyclable material from residents each year. A waste compositional analysis carried out in December 2022 identified that approximately 22% of the household residual waste was dry recyclable material that could have been recycled through the council’s co-mingled dry recycling collection service. Of that dry recyclable material, a significant proportion was found to be cardboard. In 2022/23 the council collected approximately 68,000 tonnes of household residual waste.
- 3.35 The waste compositional analysis also highlighted that approximately 30% of the household residual waste was food waste. A weekly food waste collection service is provided to kerbside properties in the borough, but our estimates suggest that only 15% to 18% of properties on the service are taking part. Until the Council is able to roll out separate food waste collection services borough wide, our engagement and behaviour change activities will support residents to reduce avoidable food waste.
- 3.36 The council had anticipated that the Government’s waste and recycling policy reforms would have been implemented during this RRP plan period. These reforms, particularly the Extended Producer Responsibility scheme for packaging waste were anticipated to provide Local Authorities with financial support to improve services. However, Government recently announced a delay to the implementation of the reforms until 2025. This has had an impact on the council’s ability to deliver enhanced performance in the short term. The council will be working hard to deliver further improvements in the recycling performance from 2025/26 onwards.

Expected performance contributions from RRP actions

- 3.37 As stated in paragraph 3.5, to reach the target set in the RRP we need to increase the recycling rate from 17.8% to 23% by the March 2025. We have estimated that we need to collect an extra 6800 tonnes of recycling in order to achieve this goal. Tables below set out the expected performance to be gained by our main current and proposed projects.

Expected Performance – Current RRP projects

Project	Expected result
Flats Recycling Project	We expect at least 2080 more tonnes of recycling to be collected per year by March 2025 this represents a 2% increase in recycling.

	We expect a reduction in contamination.
Active repromotion of the kerbside food waste service	We expect 250 more tonnes of recycling per year which represents a 0.25% increase in recycling by end March 2025 Increased participation to 25%-30%.
Other service improvement activities, including route optimisation, flats above shops and new recycling sack delivery plan	We expect this to deliver a 1.8% increase.
Communication and engagement activities	We expect these activities to close the remaining gap to 23%.

Expected Performance – Communications and engagement activities

- 3.38 Whilst it is difficult to quantify the impact that communication and engagement work has on the recycling rate, but it is noted that the recycling education team employed under the Veolia recycling contract was disbanded in June 2017 and since that time the recycling rate has been declining.
- 3.39 The ReLondon research tells us that regular and on-going communication and engagement is needed to improve recycling knowledge and particularly to maintain motivation. Since 2019 the service currently has had limited resources to undertake activities to support the whole community to look to minimise waste and recycle correctly.
- 3.40 A significant focus of the RRP is communication and engagement activities. Tower Hamlets has many active community and resident groups, including faith-based, voluntary, education and cultural organisations. The recycling team has worked with many groups to raise awareness of recycling and waste reduction and encourage their members to raise awareness of recycling and waste reduction among their communities. Between April to August 2023 the team have delivered 18 stalls, talks and events, engaging with around 1200 people. Community advocacy is a central part of the team's engagement plan and we have been working to build strong working relationships throughout the community. But there is always more that can be done to improve community connections, with a particular focus on local faith groups and in schools.
- 3.41 Our Recycling Improvement and Engagement Team regularly attends community events and hubs providing recycling and waste reduction resources, information and delivering engagement activities, for instance, the team have recently been promoting reusable recycling sacks at Idea Stores. The team also hosts free regular events across the borough to support and encourage waste minimisation such as clothes swaps, mending

workshops, and food/recipe leftover workshops, which aim to help residents reuse waste, reuse and repair items. These workshops are run in partnership with local organisations and housing providers, strengthening partnership-working across the borough.

- 3.42 Our Recycling Champions scheme has been running for over two years and is growing a network of residents to help talk about and improve recycling performance where they live. Champions get involved by sharing information with neighbours at meetings, via local social media channels, posters and leaflets, attending workshops and recycling facility tours, reporting issues and volunteering at events. Our plan is to get the Recycling Champions more involved in activities, and will be launching a social media campaign in 2024 that puts them at the front and centre of recycling advice. The benefit of this is the authentic, community voice they bring. This is more relatable and accessible for residents, which we hope will result in positive changes in behaviours as people see how they can better recycle from someone like them. We will continue to grow this network and recruit more Champions.
- 3.43 Reaching young people and families in the borough is fundamental to improving our recycling performance now and in the future. We are working in schools to deliver recycling education sessions at assemblies and classroom sessions and recycling engagement stalls at school events to spread the message about the importance of recycling among pupils and their families. We've provided free recycling and food waste bins and collections for educational institutions in the borough for many years. We are proactively reviewing the services at schools and are offering advice and resources to help improve their food waste and dry recycling performance.
- 3.44 We understand the importance of faith groups in Tower Hamlets and are working on a plan to better engage with mosques, churches and other places of worship. We are in contact with the Tower Hamlets Interfaith Forum and plan to work with them to develop engagement approaches and tools that are best suited to the partner and their congregation. Linked to this is creating communications in community languages and we are working with the Council's communications team to produce content that resonates with different audiences who do not have English as a first language.
- 3.45 Improving communication with the Bengali community is a priority and we will explore the option of increasing our reach through the use of targeted communications, such as popular Bengali television channel "Channel S".
- 3.46 Communication about recycling is continuous and content is regularly reviewed and refreshed. The "Let's Rethink it" outdoor advertising and social media campaign is currently in progress.

Resources to deliver the RRP

- 3.47 The majority of staff resources to deliver on these plans come from our Environmental Services Improvement Team, supported by key staff in waste operations and operational services. The flats recycling project team is largely

funded by capital from the Community Infrastructure Levy (CIL). Project management support is provided by the Service Design and Improvement team, with progress on delivery and performance monitored as part of new project governance arrangements

- 3.48 Delivering on the actions within our RRP will generate extra cost and budget pressures, to be managed in 2024/25. Enhancing the recycling performance further from 2025/26 onwards will require further funding and resources. Detailed planning is underway to ensure we deliver those actions that achieve the biggest gains in waste reduction, re-use, and recycling.
- 3.49 Further funding and resources will be necessary for rolling out separate food waste collections and separating the kerbside food and garden waste collections, which have not yet been secured. The full cost impact of these improvements and level of growth needed is unknown at this stage. These requirements and other implications of the Government's waste and recycling policy reforms will require revenue and capital growth. Further details of the service and finance implications will be reported in due course.

Progress to date on delivering the actions in the RR

- 3.50 As stated in paragraph 3.26, the action plan includes many actions we are already taking. The table below provides updates on the RRP actions that are in progress.

Ref	Action title	Progress to date
#1	Improving recycling infrastructure for blocks of flats and estates and tackling contamination through implementing Flats Recycling Package (FRP) interventions	All THH properties have been reviewed and recommendations made. A Managing Agent engagement event has been delivered in association with ReLondon. Improvements at THH estates have commenced with the refurbishment and exchange of recycling bins.
#2	Increasing participation in the kerbside food waste collection service through re-promotion of the service.	Survey of kerbside properties completed. Repromotion of the service will commence in the Autumn/Winter 2023.
#3	Rolling out food waste collection service to purpose-built blocks of flats	Surveying of purpose-built flats storage capacity is in progress. A pilot service is in place at two estates to test a service model for wider implementation at a future date.
#4	Reviewing the kerbside food and garden waste collection service with a view to collect food waste from kerbside properties fully separate from garden waste	This action is linked to action #3 above and will commence in due course.

#5	Reviewing service offer to kerbside properties to increase recycling	Survey of kerbside properties completed. Suitable properties not yet using recycling wheeled bins will be encouraged to switch to wheeled bins.
#6	Review and expand garden waste collection service to increase recycling	Survey of kerbside properties completed. The service will be re-promoted in the Spring 2024.
#7	Improving service delivery – Flats above shops	Mapping flats above shops is in progress with a view to commencing service monitoring in the Autumn/Winter 2023.
#8	Expansion of commercial waste service to include food waste and promote recycling collection service	We have committed to review commercial waste recycling services across the borough, to provide an improved service offer and increase take up of business recycling as part of this.
#9	Improve recycling sack distribution	New sack distribution plan under development
#10	Championing food waste reduction initiatives	Food waste reduction activities are centred around WRAP's national Love Food Hate Waste campaign and Food Waste Action Week that is held in March each year. Two events have been scheduled to date, 17 th August 2023 and 7 th March 2024. Tower Hamlets is also taking part in a pan London sustainable food campaign being run by ReLondon.
#11	Reuse, repair and recycling activities and events	A Strategic Plan target to deliver at least 32 events/activities in 2023/2024 has been set and dates for 11 events have been scheduled to date.
#12	Promoting waste reduction and recycling within the local community through the Recycling Champions Scheme	We have set a Strategic Plan target to recruit 35 new champions and undertake engagement via 1 dedicated event each quarter including a thank you event and MRF tours and bi-monthly newsletters.
#13	Education and behaviour change – Schools recycling programme	We have set a target to deliver a minimum of 10 education events at schools in 2023/2024. A new leaflet has been developed to promote the scheme which will be sent to all schools in the borough.
#14	Expand locations for the recycling of small WEEE and batteries	Small WEEE and battery collection points are currently at the RRC and every Idea Store. Further suitable locations will be investigated.
#15	Expand opportunities for residents to reuse and recycle textiles	Events planned for the year include clothing swap events which promote reuse.
#16	Collaboration with faith groups and targeted/local media to promote recycling and waste reduction	Engagement plans with key contacts from faith groups, local mosques, community organisations and local media are under development in Autumn 2023
#17	Directory of repair / circular economy companies in the	A webpage is being developed with the communications team.

	borough to promote/work with (any reuse schemes, refill shops, container reuse)	
#18	Promoting reduction of single use plastics	A plan is in development with the communications team.
#19	Improving waste reduction and recycling arrangements in new developments	<p>The Reuse, Recycling and Waste SPD was adopted in 2020. The SPD provides the framework for waste and recycling facilities in new developments and shapes the council's response to planning applications in this respect.</p> <p>Recruitment of an Officer to support developers shape their waste management proposals is in progress. This Officer will also be conducting site visits at new developments as they come online.</p>
#20	Promoting waste reduction and Circular Economy principles in the business community	Tower Hamlets has signed up to ReLondon's Circular Economy Matchmaker, a place to help local authorities and businesses to connect and collaborate. The Matchmaker provides opportunities to engage circular businesses in future project or identify circular businesses that can help green the supply chain.
#21	Greening the waste collection fleet	<p>Delivered in 2 phases including the waste fleet:</p> <p>Phase 1: £5.475 million in CIL funding has been approved for supply of electric cars, vans and light commercial vehicles, including installation of charging points in line with approved funding and procurement plans.</p> <p>Phase 2: Development of plans for replacement of remaining specialist vehicles, including trial of electric vehicle replacement options, development of business case for capital funding and procurement plans.</p>

Monitoring the RRP

- 3.51 Delivery of the actions in the RRP will be monitored internally through our service plans, monitoring progress on Strategic Plan Annual Delivery Plan and Net Zero Carbon Action Plan, as appropriate. The RRP, as a whole, will be monitored annually by the GLA.

Liaison with the GLA

- 3.52 A draft of the RRP was submitted to the GLA in January 2023 for initial officer review. Following feedback, the RRP was updated and resubmitted to the GLA in March 2023, for further review.
- 3.53 Further feedback from the formal review was received on 14th April and confirms that the GLA are content for the RRP to progress through for sign off by the Mayor in Cabinet, prior to formal approval by the Deputy Mayor of London. Confirmation of general conformity by the Deputy Mayor of London is subject to the RRP being implemented in a timely and effective manner and on the proviso that the council commits to and demonstrates active progress in delivering the following commitments:
- 3.54 Improving recycling infrastructure for 2,160 blocks of flats and estates and tackling contamination through implementing Flats Recycling Package (FRP) interventions by December 2024 (LB Tower Hamlets #1).
- 3.55 Completion of the route optimisation exercise to improve service delivery for recycling for residents at new build flats in the borough.
- 3.56 Rolling out food waste collection services to purpose-built blocks of flats, to a target of 30% purpose- built coverage by March 2025 (LB Tower Hamlets #2).
- 3.57 Reviewing the kerbside food and garden waste collection service with a view to collect food waste from kerbside properties fully separate from garden waste and prepare an implementation plan by March 2024, and in line with prospective government requirements and timescales.
- 3.58 Expansion of commercial waste service to include food waste and promote recycling collection service by 2024 onwards.
- 3.59 Greening the waste collection fleet, in line with the council's programme to electrify its whole fleet and the target for all HGVs to be electric or hybrid by 2030 (LB Tower Hamlets #20).
- 3.60 The RRP is attached to the report as Appendix 1

4. EQUALITIES IMPLICATIONS

- 4.1 The actions set out in the RRP are focused on improving services to support residents and businesses to minimise their waste and reuse and recycle

more. The actions proposed in the RRP will have a positive impact on the environment which will provide a better quality of life for all groups including those with protected characteristics.

- 4.2 Using population data, we have identified groups with protected characteristics within in the community, considered how each groups needs might differ and tailored services and communications accordingly.
- 4.3 The impacts of RRP actions on people living in different housing types, people with different fluency in English and people with each of the protected characteristics have been considered and are discussed in the Equality Impact Analysis Screening Tool which is attached as Appendix 2.

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.

Best Value Implications

- 5.2 Waste and recycling services have a combined annual value of approx. £18.5M with pressure on service budgets to deal with increasing demands from population growth, service innovation and continuous improvement.
- 5.3 Overall, our plans are focusing on looking to reduce waste, through actions such as encouraging greater reuse of unwanted items, reducing the level of contamination in our recycling and targeting illegal commercial waste as means to mitigate costs increases from population growth drive better value from services.
- 5.4 Some activities in the RRP are funded by an allocation of capital funding from CIL.

Consultations

- 5.5 The action plan hasn't been consulted on because it brings together actions from strategies that have already been consulted on, specifically the Strategic Plan and the Waste Management Strategy. The Waste Management Strategy will need to be reviewed at some point in the future, but this needs to wait until there is more detailed direction from Government on the waste and recycling reforms.

Environmental (including air quality)

- 5.6 The council's waste management services contribute to the protection of the environment and protecting human health through the promotion of waste minimisation and effective management of waste arising in the borough.
- 5.7 The main focus of the RRP is to move waste up the waste hierarchy by providing residents and businesses in the borough with greater access to services that will allow and encourage them to waste less, reuse and recycle more. This will contribute to the council's efforts to mitigate the impacts of climate change by reducing the carbon footprint of the council's waste management services.
- 5.8 The Emissions Performance Standard (EPS) is one of the metrics that features in the RRP. The EPS measures greenhouse gasses released from London's local authority waste management activities. The EPS aims to achieve significant carbon dioxide (CO₂) emissions savings from the management of London's local authority waste. The EPS focuses on treatment of waste with an emphasis on recovering materials which deliver greater CO₂ reductions.
- 5.9 The RRP also looks to support the achievement of the council's air quality action plan objectives through the incorporation of the council's plans to green the waste services vehicle fleet.

Risk Management

- 5.10 Some actions set out in section three of the RRP seek to address the some of the expected upcoming Government reforms. However, implementation of these actions is subject to further clarity from Government, access to funding and the ability to address operational and waste treatment issues as identified in the RRP, specifically action LB Tower Hamlets #4.

6. COMMENTS OF THE CHIEF FINANCE OFFICER

- 6.1 The report is seeking approval of the Council's Recycling and Reduction Plan 2023-25, to deliver improvements to waste and recycling performance as part of the strategic plans to deliver a clean and greener future for Tower Hamlets, and to comply with requirements set by the GLA.
- 6.2 The additional actions to implement the Recycling and Reduction Plan will need to be funded from existing budgets. Capital funding bids are expected to cover the increased costs of recycling infrastructure e.g., recycling bins required to deliver enhanced recycling performance.
- 6.3 Delivering on the actions within the RRP will generate extra cost and budget pressures in 2024/25, relating to increased quantity of recycling tonnage to be processed combined with inflationary pressure on processing costs and

borrowing costs for capital investment. Cost mitigations will be identified to manage these budget pressures.

7. COMMENTS OF LEGAL SERVICES

- 7.1 Pursuant to s.355 of the Greater London Authority Act 1999, the Council must:
Act in general conformity with the provisions of the London Environment Strategy dealing with municipal waste management, save to the extent that compliance does not impose excessive additional costs on the authority.
- 7.2 Act in accordance with any guidance from the Secretary of State for determining what is to be regarded as acting in general conformity or imposing excessive additional costs.
- 7.3 Pursuant to s.356 of the Greater London Authority Act 1999, the Mayor of London can give a direction requiring the Council to take action if he considers it necessary for the purposes of the implementation of the London Environment Strategy. The Council must comply with any such direction.

Linked Reports, Appendices and Background Documents

Linked Report

- NONE.

Appendices

- Appendix 1 - Tower Hamlets Reduction and Recycling Plan (RRP) April 2023 to March 2025
- Appendix 2 - Equality Impact Analysis Screening Tool

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

- None

Officer contact details for documents:

N/A

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Tower Hamlets Reduction and Recycling Plan (RRP)

April 2023 to March 2025

1. Background

This Reduction and Recycling Plan for 2023 to 2025 is the first phase of ambitious plans to deliver a clean and green future for Tower Hamlets. We are committed to delivering improvements over the next 5 years, with initial investment in service re-design, service delivery and community engagement.

Our plans to optimise recycling collections, deliver over £2million in flats recycling improvements and develop improved communication and community engagement are just the start. We are working alongside other local authorities and recycling experts to pilot collecting food waste on housing estates, to improve recycling from people living in flats above shops and to create more leverage from community engagement. Taking lessons learnt, we plan to drive measurable behaviour change with the help of support from landlords, community groups, faith groups, local mosques, local media and the business community.

This forms an important part of our commitment to become a net zero carbon council, in addition to demonstrating how we contribute to delivering improvements as part of the London Environment Strategy.

Tower Hamlets strategies and policies

Our Strategic Plan 2022 – 2026 is the council's overarching strategy that sets out the vision and direction of travel for all council services. It is supported by an annual delivery plan which shows how the strategic plan priorities will be delivered and monitored. Strategic Plan Priority 7 centres around delivering a cleaner and greener future for Tower Hamlets with the broader aims of becoming a carbon neutral council by 2025 and a carbon neutral borough by 2045. A key component of this is to drive improvements of the council's waste and recycling services, particularly carbon reduction of operations and carbon offsetting through waste reduction and higher recycling capture. To achieve this, the Mayor of Tower Hamlets has set up the Waste Management Taskforce to oversee the delivery of an action plan of improvements for these services.

In 2019 Tower Hamlets adopted its Waste Management Strategy 2018 – 2030. A central aim of the strategy is to move more waste up the waste hierarchy with the core objective of helping residents to reduce waste and keep items in use for longer in line with the principles of a more circular economy and recycle where waste reduction or reuse is not possible.

In July 2021 Tower Hamlets adopted the Reuse, Recycling and Waste SPD which has been developed, with the support of ReLondon, to set out the council's expectations in respect of the provision or suitable storage and collection systems for new developments that facilitate and encourage greater reuse and recycling of household waste. In March 2019, Tower Hamlets became one of the first councils in the country to declare a climate emergency. One of the associated commitments is for Tower Hamlets to aim to become a zero carbon or carbon neutral Council by 2025.

National Resources and Waste Strategy

The Resources & Waste Strategy was published by the Government in 2018. The strategy set out targets for higher recycling rates and included proposals for three major reforms: improved consistency of collections, a Deposit Return Scheme (DRS), and changing producer requirements via an Extended Producer Responsibility (EPR) scheme.

Consultation on the reforms has taken place and further details are expected in 2023 including specific recycling targets and details of the funding arrangements for Local Authorities. These changes have the potential to increase the share of the responsibility taken by the producers of packaging waste for the cost of collection and disposal of that material and make recycling easier for consumers. Implementation of these policies is likely to require changes to recycling collection services. To date, detailed planning has been made difficult by the delayed publication of the Government response to the consistency in recycling reforms and associated statutory guidance.

London Environment Strategy

The Mayor of London's London Environment Strategy published in May 2018, sets out objectives, targets and policies for the effective management of London's municipal waste and progression towards a circular economy. The strategy's waste objectives for London are:

Objective 1 - Drive resource efficiency to significantly reduce waste, focusing on food waste and single use packaging.

Objective 2 - Maximise recycling rates.

Objective 3 - Reduce the environmental impact of waste activities (greenhouse gas emissions and air pollutants).

Objective 4 - Maximise local waste sites and ensure London has sufficient infrastructure to manage all the waste it produces.

The strategy includes an expectation of London recycling 65% of municipal waste recycling by 2030. The strategy also assumes a London wide household waste recycling rate of 50% by 2030 whilst acknowledging the different abilities of London Local Authorities to contribute to this target and identifies additional Government interventions needed to achieve the targets.

It is a requirement that London councils prepare and submit a Waste Reduction and Recycling Plan (RRP) to demonstrate general conformity with the Mayor's London Environment Strategy.

Our current waste and recycling services

Tower Hamlets is a unitary authority responsible for both the collection and the treatment and disposal of municipal waste. Since April 2020 the waste and recycling collections and street cleansing services have been delivered inhouse. We currently have contracts with Cory Environmental for treatment and disposal, and Bywaters for sorting of dry recycling.

We provide a comprehensive recycling service which includes a weekly comingled dry recycling service to all residents, with materials taken to a materials recovery facility (MRF). We provide a weekly food and garden waste service to residents in kerbside properties, and we are trialling a weekly separate food waste collections for 870 purpose-built flats. Food and garden waste are presented separately but are collected co-collected and taken to an In-vessel Composting Facility (IVC) for treatment. There is one Reuse and Recycling Centre (RRC) in the borough which enables the reuse and recycling of more than 40 different types of waste. Around the borough there is a network of charity textile banks, small electrical waste and battery recycling points.

We provide a free bulky waste collection service for residents of 2 collections of 5 items per year. Bulky waste (excluding upholstered soft furniture containing POPs), street cleansing, litter and market waste arisings are sent to a residual "dirty" MRF to enable sorting and recovery of materials for recycling.

Kerbside properties receive a weekly collection of residual waste, predominantly via sacks, and flatted properties use communal bins with varying collection frequencies. Residual waste is sent for incineration with energy recovery.

A commercial waste collection service for residual waste and comingled recycling is available to businesses in the borough.

Our challenges

Tower Hamlets has the fastest growing population nationally. The local population has grown by 22.1% from 254,000 in 2011 to 310,300 in 2021. Tower Hamlets is also the most densely populated borough in England with 15,695 residents per square kilometre. Tower Hamlets has seen the largest increase in total number of households of any local authority area across England and Wales. Between 2011 and 2021 an additional 19,200 households have been formed representing a 19% increase since 2011. Between 2019 and 2022, 9,000 properties alone have been completed, representing a 7% increase. Resources (service) and infrastructure for recycling at blocks of flats has not kept pace with this rate of property growth and increase in household waste arisings. This has a direct effect on the amount of recycling that is collected and the quality of the materials.

There are 122,880 flats/maisonettes in Tower Hamlets, this represents 88% of the dwelling stock. Across London 56% of homes are flats/maisonettes compared to just 24% for England (VOA,2021). The high number of flatted properties and communal bin collections poses challenges in achieving high recycling rates, reducing contamination in the dry recycling and introducing waste restrictions or reduced rubbish collection frequencies.

There are a number of factors which impact on Tower Hamlets recycling rate. A high percentage of flats, high population density, age of housing stock and past planning approvals limiting storage capacities, significant rented accommodation, low numbers and small sizes of gardens generating small quantities of garden waste for composting, high levels of deprivation, a highly transient, younger population, the need to engage with a culturally diverse population and significant numbers of commuters and visitors.

Current recycling performance

Tower Hamlets recycling rate for 2021/22 was 19.7%. Our data indicates that the recycling rate for 2022/23 has dropped further, with the estimated recycling rate for 2022/23 being approx. 18%. Working against the baseline year for 2019/20 (set by the GLA) when our recycling rate was 21.5% puts the council under extreme pressure to meet the target it has set for 2024/25 of 23%. The average contamination rate in the first four months in 2022/23 is 27.95% compared to 22.01% during the same period in 2021/22. The recycling rate for local authority collected waste (LACW) has also fallen from 19.05 in the baseline year to 17.87% in 2022/23.

2. Reduction and recycling plan actions

This plan follows on from our first RRP 2018 – 2022 and is a cross-cutting plan bringing together actions from our current strategies focussed on three key themes:

- Waste reduction and reuse;
- Maximising recycling; and
- Reducing environmental impacts.

Waste reduction and reuse

Actions focused on helping people to reduce waste are becoming increasingly important from the impact of the cost-of-living crisis on individuals and the cost of delivering our services. By reducing overall levels of waste, we will reduce the carbon emissions associated with managing our waste. Finding ways to reuse items, rather than disposing of them, helps to keep vital natural resources in circulation for longer

Reducing food waste

Helping people to reduce the amount of food that is wasted will help to cut food shopping costs and will reduce the amount of waste that the council has to dispose of. We will continue to actively promote the national “Love Food Hate Waste” campaign and Food Waste Action Week. We will support residents to find innovative ways to use food leftovers through workshops and community networks and our Recycling Champions.

We are taking part in the pan-London awareness-raising campaign to inform and empower Londoners to reduce their personal food footprint. It aims to reduce household food waste; food-related consumption-based emissions; and save residents money on their food bills. The campaign is being delivered in partnership with ReLondon, One World Living (a London Councils-led climate initiative focussed on reducing consumption emissions), and 23 London boroughs.

Home and community composting

Tower Hamlets has for many years supported individual residents and community groups to compost food waste at home, or through community composting schemes. A range of compost bins and wormeries are available for residents to purchase at discounted prices. For residents with gardens, or access to gardens, producing compost at home, from food and garden waste, provides a low-cost alternative to shop bought compost/soil conditioner. Taking part in gardening activities supports general wellbeing and growing your own fruit and vegetables can help tackle the rising cost of food shopping. We will continue to support residents to compost food waste at home.

We are supporting a LIF funded pilot which will collect food waste from local businesses and residents for composting. Community group partners will take the food waste by e-cargo bike to the new central food waste hub at Tower Hamlets Homes managed block Wingfield House. The food waste will then be processed to make compost to be used in community gardens including those growing food. Information and lessons learnt from the pilot will help inform food waste and recycling strategies for businesses, traders, and residents.

Waste reduction events

Working with local partners including Sunny Jar Eco Hub, Children’s Centres, Idea Store ESOL classes and Friends of the Earth Hackney and Tower Hamlets, we are running a programme of free events to encourage reuse and waste minimisation, helping residents to save money, and provide opportunities to raise awareness about recycling and greener living. The events include swaps shops, bicycle repairs and workshops on clothes mending, composting, upcycling, low-waste living and food waste reduction. Clothing swaps are well attended with an average of 70 people coming to each event.

Maximising recycling

We are committed to extracting as much recyclable material out of the waste stream by providing all Tower Hamlets residents and businesses access to a wide range of recycling services. We know that this will have a positive impact towards a cleaner and greener borough and will support improvements delivered by the London Environment Strategy. The latest waste composition analysis conducted in Tower Hamlets for the 2022/2023 period highlighted that discarded food comprised over a quarter of general waste. The same analysis showed that while the average capture rate of recyclable material in low-rise properties is 70%, this rate almost halves to 36% for flatted properties, where almost 90% of Tower Hamlets residents live. Additionally, out of all the recyclable material captured in Tower Hamlets during the 2022/2023 period, over a quarter (27.3%) was found to be unrecyclable (contamination). We know that collecting food waste from high-rise properties and encouraging residents to recycle more and better through improved communications and service design will likely have a positive impact on our recycling rate.

The council is also working on the optimisation of waste and recycling collection routes, including commercial waste. This will improve the efficiency of collections by reducing vehicle movements, reducing missed collections, and will give us a better understanding of our commercial recycling customers and current offer to them, which will guide our service improvements. The council’s planned

switch to electric commercial waste collection vehicles will also contribute to the green credentials of local businesses. Businesses in Tower Hamlets will be engaged later in 2023 regarding current service levels and available options including recycling services and food waste.

Flats recycling project

Improvement of communal recycling facilities at blocks of flats is fundamental to improving our recycling rate. In some locations there is as much as 30% to 40% under provision of recycling bins. This means some residents have less opportunity to recycle.

In 2018-19 two Peabody estates in Tower Hamlets took part in the ReLondon flats recycling research pilot. Following release of the research results, we applied the “Flats Recycling Package” recommendations at 25 Tower Hamlets Homes estates. The roll-out is currently continuing via the Flats Recycling Project.

The Flats Recycling Project is being funded through council’s Capital programme (via £2.1 million from CiL) is using best practise recommendations from ReLondon studies to improve recycling infrastructure and communication across the borough, aiming to cover 2160 properties by December 2025. A dedicated team of 5 Officers is working on the project, working closely with managing agents to develop, agree and roll-out, tailored improvement plans at each individual block of flats. Progress and performance of this project is monitored through the Waste Operations Board.

The project will improve recycling bin provision at properties with shared recycling bins; and improve residents access to recycling facilities. It will also reduce contamination, by upgrading existing recycling bins to ones with lockable reverse aperture lids which have openings big enough to allow recycling to be placed inside but small enough to prevent rubbish in black sacks from going in. Communications will also be improved, with instructional signage going up around recycling and refuse bins, leaflets going out to residents, reusable recycling bags being made available and engagement with TRAs, crew, caretaking staff and managing agents.

Managing agents and landlords are a key partner to help us improve recycling performance, with investment from them often required to improve their facilities. We will support and encourage them to make improvements to waste infrastructure and communications.

Expanding food waste collections

Tower Hamlets currently provides a food waste collection service to street level properties and is available to schools within the borough. The food is currently co-collected with garden waste. Tower Hamlets is committed to implementing separate weekly food waste collections for all households, including flats, as this is key to help deliver a cleaner and greener future for Tower Hamlets and support improvements under the London Environment Strategy.

To better understand the process of collecting food waste from purpose-built flats and barriers to participation faced by residents, we’ve piloted food waste collections to 870 properties at two sites in the borough for nearly two years. We’ve also engaged ReLondon as a critical friend to explore possible service delivery models. We face many challenges to delivering a borough-wide food waste collections service, including the ability to find sufficient space on estates and at blocks of flats to accommodate additional bins and engaging residents to find space within their homes to segregate this waste from their rubbish.

We are committed to deliver borough-wide food waste collections to all households including people living in flats. Tower Hamlets has applied to DEFRA and been granted transitional arrangements in the form of an extension of time, for implementing separate food waste collections to April 2027. Work is underway to prepare for this change, to put in place contractual arrangements for separate food waste treatment, to plan for procurement of electric food waste collection vehicles, supply of food waste bins and creation of new collection routes. We expect to be able to plan and deliver this change by April 2027, subject to confirmation of funding support from central government. In the meantime, we will make use of existing pilots to improve service design and help inform plans for wider roll out.

In addition to our plans to deliver wider food waste collections, we will continue to encourage residents to reduce avoidable food waste by promotion of the national “Love Food, Hate Waste” and Pan London Sustainable Food Waste campaigns.

Garden waste

Tower Hamlets currently provides a garden waste collection service to kerbside properties, free of charge. The garden waste is currently collected with food waste. Tower Hamlets is committed to look to collect garden waste separately in the future, alongside the implementation of a separate weekly food waste collection service as set out above.

Flats above shops

Providing recycling services for flats above shops is challenging, there is often a lack of space to place containers behind or adjacent to properties, landlords and residents are hard to engage with. The collection arrangements for flats above shops is more complicated than for kerbside properties and residents often find it difficult to understand how and when to place their waste and recycling out for collection. There are an estimated 2,900 flats above shops, at least 2,000 of which are on the main lines (e.g., red routes, high street locations). Flats above shops are currently not included in the food waste collection service. We will look to improve our service provision to flats above shops to make it easier for these residents to take part in recycling services and are submitting an expression of interest to take part in the ReLondon improving recycling in flats above shops pilots. ReLondon have recently published a report on improving service provision for flats above shops, we will be looking to draw on the findings and to undertake benchmarking with other authorities who have high numbers of this property type.

Engagement

Tower Hamlets has many active community and resident groups, including faith-based, voluntary, education and cultural organisations. The Recycling Improvement and Engagement team has worked with many groups over to raise awareness of recycling and waste reduction and encourage their members to raise awareness of recycling and waste reduction among their communities. Between April to August 2023 the team have delivered 18 stalls, talks and events, engaging with around 1200 people. Community advocacy is a central part of the team's engagement plan and we have been working to build strong working relationships throughout the community. But there is always more that can be done to improve community connections, with a particular focus on local faith groups and in schools.

The team regularly attends community events and hubs providing recycling and waste reduction resources, information and delivering engagement activities, for instance, the team have recently been promoting reusable recycling sacks at Idea Stores. The team also hosts free regular events across the borough to support and encourage waste minimisation such as clothes swaps, mending workshops, and food/recipe leftover workshops, which aim to help residents reuse waste, reuse and repair items. These workshops are run in partnership with local organisations and housing providers, strengthening partnership-working across the borough.

Our Recycling Champions scheme has been running for two years and is growing a network of residents to help talk about and improve recycling performance where they live. Champions get involved by sharing information with neighbours at meetings, via local social media channels, posters and leaflets, attending workshops and recycling facility tours, reporting issues and volunteering at events. Our plan is to get the Recycling Champions more involved in activities and will be launching a social media campaign in 2024 that puts them at the front and centre of recycling advice. The benefit of this is the authentic, community voice they bring. This is more relatable and accessible for residents, which we hope will result in positive changes in behaviours as people see how they can better recycle from someone like them. We will continue to grow this network and recruit more Champions.

Reaching young people and families in the borough is fundamental to improving our recycling performance now and in the future. We are working in schools to deliver recycling education sessions at assemblies and classroom sessions and recycling engagement stalls at school events to spread the message about the importance of recycling among pupils and their families. We've provided free recycling and food waste bins and collections for educational institutions in the borough for many years. We are proactively reviewing the services at schools and are offering advice and resources to help improve their food waste and dry recycling performance.

We understand the importance of faith groups in Tower Hamlets and are working on a plan to better engage with mosques, churches and other places of worship. We are in contact with the Tower Hamlets Interfaith Forum and plan to work with them to develop engagement approaches and tools that are best suited to the partner and their congregation. Linked to this is creating communications in community languages and we are working with the Council's communications team to produce content that resonates with different audiences who do not have English as a first language.

Communications

Communication about recycling is continuous and content is regularly reviewed and refreshed.

The "Let's rethink it!" campaign which started at the beginning of the year (2023) is a focused behaviour change campaign aimed at increasing recycling rates and reducing contamination.

It uses simple messaging with a positive look and feel and a clear call to action for people to be mindful about what they put in their recycling bin. This campaign aims to tackle the issue of contamination in our recycling, while educating the public on how easy it is to do the right thing and recycle properly in the borough. Given Tower Hamlets' demographics, transient population and housing stock the campaign visuals are aimed at 20–30-year-olds, who live in flats, however the messages still resonate with other age groups.

Two workshops with residents and one with the recycling and waste service were run to help inform messaging and target any negative behaviours and misconceptions about recycling. Participants were recruited through the council's Residents' Panel, with the only criteria being that they lived in a flat.

The campaign launched with an endorsement message from the Mayor of Tower Hamlets in the residents' newsletter (87k subscribers). The first phase of campaign visuals ran across all the council's corporate outdoor advertising spaces and digital screens from January-March, remaining on digital screens, and on social channels, supported with programmatic advertising targeted at

people who live in flats in Tower Hamlets. A dedicated campaign landing page is hosted on the main corporate website, which by 5 July 2023 has received over 32,400 page views and more than 28,800 unique visitors.

The first phase of the campaign was to test awareness levels about what can and can't be recycled. On social media, we ran a survey get this data to help gather this information and to inform the subsequent phases of the campaign. It found that the most common item that can be recycled but which isn't aerosol cans, followed by plastic items, and the most common contaminate is food waste.

This insight was woven into later messages in a second phase of visuals that were rolled out in April 2023 across corporate outdoor advertising sites, social channels and programmatic advertising.

The most effective behaviour change communications happen at the point of the actual behaviour. With this in mind, to help tackle the issue of contamination, we created a sturdy A5 leaflet for residents to keep on their fridge, near to their recycling bin that clearly showed what items can and can't be recycled. This was distributed alongside the quarterly residents' magazine, Our East End, which is delivered to every home in the borough.

Around the same time the phase 2 visuals were rolled out, the campaign ran a second survey online to compare awareness levels. It found a positive shift in awareness of what items can be recycled but a mixed response for what items can't be recycled, showing that more work needs to be done in the latter area. Digging into the comments, the survey also showed that awareness of what can and can't be recycled is 15% of the problem. Solving other behavioural barriers like the ease of recycling, attitude, space, inconvenience, overflowing bins or missed collections is 85% of the problem.

The learnings from the surveys will help inform the next steps with this campaign but content is likely to focus on contamination in 2024 as this is a major challenge to recycling levels.

The final phase of this campaign will be rolled out in the Autumn 2023 and will feature an animation about the journey of recycling once it is collected and focuses on the contamination message and why it is important for people to get this right. English and Bengali voiceovers are planned. This iteration of the campaign will be wrapped up with thank you messages about recycling right supported with available service statistics. Assets will continue to be used at events and online, and further developed to support a Christmas/New Year festive season recycling and reusing campaign.

Commercial waste services

At the transfer of commercial waste services back in-house in April 2020, the quality and range of services was not fit for purpose. Our plans to improve the service were then impacted by the Covid19 pandemic. With the cost-of-living crisis adding pressure on local businesses, we are committed to service improvement. To deliver a more cost effective, flexible waste and recycling service. This means expanding our future range of services to increase recycling collections, including food waste. Improvements have been implemented in 2022/2023 with ongoing efforts focused on connecting with customers to design services around their needs. Through the route optimisation project, we will be implementing dedicated collection resources for commercial waste and the service will be reconfigured to better meet the needs of our business customers. Our enforcement teams are working to wage war on illegal fly tipping, to reduce the impact of illegal disposal of commercial waste and encourage all businesses to take responsibility for their waste. We will continue to provide improved information and advice to all businesses about how they manage waste and reduce the impact of their business on local environmental quality. To waste less, save money, re-use and recycle more.

Reducing environmental impact

Tower Hamlets is committed to reducing the environmental impact of our waste services. The London Environment Strategy requires us to measure and reduce the environmental impact of our waste services by measuring the carbon emissions, as well as the amount of waste produced and recycled. We will reduce our impact on the environment through our waste and recycling services and contribute to the London Mayor's 'zero carbon city 2030' target by implementing initiatives that support the waste hierarchy, minimising waste and increasing recycling, and lowering our carbon emissions.

The council's entire fleet already meets London's ULEZ standards. We are currently working on a programme to reduce fleet emissions further by switching to electric and hybrid vehicles, including waste service vehicles. This includes increasing the number of smaller vehicles running on electricity or hybrid to half by 2025 and making all heavy goods vehicles electric or hybrid by 2030. In preparation for this, work has already begun to install electric vehicle charging infrastructure at the Blackwall Depot. The implementation of route optimisation for waste and recycling collections will also lower the environmental impact of services by creating collections territories thereby decreasing vehicle movements in the borough.

3. Key strategic documents linked to this plan:

This RRP is a cross-cutting plan that has been developed from the vision, objectives and actions of the following Tower Hamlets strategies and plans:

- [The Strategic Plan](#)
- [Tower Hamlets Net Zero Carbon Action Plan](#)
- [Tower Hamlets Air Quality Plan 2022-2027](#)
- [Tower Hamlets Local Plan 2031: Managing Growth and Sharing Benefits](#)

4. RRP Dashboard:

Common Performance Targets	Baseline Performance (2019/20)	Performance Target 2024/25	Metric Guidance / Data source	Target Guidance
Total annual household waste per head (kgs/head)	226.82	220	Defra stats (Ex BVPI84a)	Borough sets own targets, informed by ReLondon /WRAP good practice.
Total annual household residual waste collected per household (kgs/household)	442.96	430	Defra stats (Ex NI191)	Borough sets own targets, informed by ReLondon/WRAP good practice.
Total annual household avoidable (edible) food waste (kgs/head)	47	45	Borough to estimate based on own or WRAP food waste composition data. Estimates should be based on avoidable food waste produced (i.e., not just food waste collected).	Based on estimated avoidable food waste produced. Borough to set own targets, informed by ReLondon/WRAP good practice and support programmes (e.g., Trifocal).
Annual household waste recycling rate (% by weight)	21.5%	23%	Defra stats	Borough sets own targets, informed by ReLondon/WRAP Route Map modelling and other good practice. The GLA will use the borough recycling benchmarking table in the Route Map modelling as a reference point when assessing local authority targets set in the RRP process (See Appendix 2 of the London Environment Strategy, page 111: https://www.london.gov.uk/sites/default/files/les_appendix_2_-_evidence_base_0_0.pdf)
Annual LACW recycling rate (% by weight)	19.05%	20%	Defra stats	Borough sets own targets, informed by ReLondon/WRAP good practice. Targets should at least match household recycling targets, going beyond the mayor's 50 per cent LACW recycling target by 2025 where possible.
Proportion (%) of properties receiving the mayor's minimum level of service for household recycling:				
06.402 % of kerbside properties (all households on a kerbside collection) collecting six main dry materials (glass, cans, paper, card, plastic bottles and mixed rigid plastics (pots, tubs and trays) <u>and separate food waste</u>)	0% (the 0% is due to food waste being co-collected with garden waste. 100% of kerbside properties are served with dry recycling of six main materials and mixed food and garden waste)	100%	Borough to take from own info. Separate food waste does not include co-mingled with garden waste	Borough sets own target, informed by ReLondon/WRAP good practice. Separate food waste does not include co-mingled with garden waste
% of kerbside properties (all households on a kerbside collection) collecting six main dry materials (glass, cans, paper, card, plastic bottles and mixed rigid plastics (pots, tubs and trays)	100%	100%	Borough to take from own info (<i>Nb included for boroughs that are unable to provide food waste collections due to long term contractual issues</i>).	Borough sets own target, informed by ReLondon/WRAP good practice.
% of flats (communal collections, <u>excluding flats above shops</u>) collecting six main dry materials <u>and separate food waste</u>	0%	30%	Borough to take from own info.	Borough sets own target, informed by ReLondon/WRAP good practice.
% of flats (communal collections, <u>excluding flats above shops</u>) collecting six main dry materials (glass, cans, paper, card, plastic bottles and mixed rigid plastics (pots, tubs and trays).	100%	100%	Borough to take from own info.	Borough sets own target, informed by ReLondon/WRAP good practice.

Common Performance Targets	Baseline Performance (2019/20)	Performance Target 2024/25	Metric Guidance / Data source	Target Guidance
% of flats above shops (FAS) collecting six main dry materials (glass, cans, paper, card, plastic bottles and mixed rigid plastics (pots, tubs and trays)) <u>and separate food waste</u>	0%	25%	Borough to take from own info.	Borough sets own target, informed by ReLondon/WRAP good practice and FAS data.
% of flats above shops (FAS) collecting six main dry materials (glass, cans, paper, card, plastic bottles and mixed rigid plastics (pots, tubs and trays)).	100%	100%	Borough to take from own info.	Borough sets own target, informed by ReLondon/WRAP good practice and FAS data.
Proportion (%) of waste fleet heavy vehicles that are ULEZ compliant	100%	100%	See www.tfl.gov.uk/modes/driving/ultra-low-emission-zone	Borough should aim to operate a fully ULEZ compliant waste fleet as a minimum; with aspirations to introduce zero emission vehicles where practicable. Please include baseline and target % of waste vehicles that are zero emission capable where applicable
Performance of LACW activities against the Mayor's EPS (tonnes of CO2eq per tonne of waste managed).	-0.033	-0.069	Use tool found here Boroughs to set by uploading WDF data into the GLA tool.	Borough to run their own scenarios using GLA tool to determine planned service changes (DSO borough) or new contract options against the EPS for target years (2024/5). See London Environment Strategy Proposal 7.3.2.b

5. RRP Actions:

Ref	Theme <ul style="list-style-type: none"> Waste Reduction Maximising Recycling Reducing Environmental Impact Maximising local waste sites 	Action title	Action Description	Expected Target / Impact	Timescale for action	WCA/WDA
LB Tower Hamlets #1	<ul style="list-style-type: none"> Maximising recycling 	Improving recycling infrastructure for blocks of flats and estates and tackling contamination through implementing Flats Recycling Package (FRP) interventions	<p>The Flats Recycling Package project commenced in 2022 and is focussed on rolling out the Flats Recycling Package of interventions recommended by ReLondon</p> <p>Improving resident access to recycling bins is a key part of the package.</p> <ul style="list-style-type: none"> We have committed to audit and refurbish bin store areas up to the standard of the Flats Recycling Package at 2160 blocks in the borough in 2022 to 2024 e.g., carrying out improvements to signage, communications, bins and establishing regular servicing & cleaning frequencies. 	<ul style="list-style-type: none"> Target for 2160 blocks to have received FRP interventions by December 2024 Estimate that 1140 blocks will receive updates in 2023/24 and 770 2024. Target to reduce contamination rate by 20% by December 2024 Target to increase amount of recycling collected by 18% by December 2024 Analysing MRF data and working with crews to identify and tackle contamination hotspots 	<ul style="list-style-type: none"> Project commenced in April 2022 and is ongoing through to December 2024 	
LB Tower Hamlets #2 Page 404	<ul style="list-style-type: none"> Maximising recycling 	Increasing participation in the kerbside food waste collection service through re-promotion of the service.	<p>Current participation in the food waste collection service for street level properties is estimated to be as low as 15% in some areas. The service is undergoing a route optimisation exercise with new rounds anticipated to be implemented.</p> <ul style="list-style-type: none"> We will develop and implement targeted communications, through the use of leaflet drops and targeted social media communications, to encourage greater participation in the scheme once the new rounds have settled in 	<p>To contribute to increasing to household recycling rate:</p> <ul style="list-style-type: none"> Target increasing participation in the service by 25% 	<ul style="list-style-type: none"> Communication Plan developed by Oct 2023 Start date early 2024. Rolling programme up to target different areas of the borough 	
LB Tower Hamlets #3	<ul style="list-style-type: none"> Maximising recycling 	Food waste collection service to purpose-built blocks of flats	<p>We are reviewing our existing food waste trial in 870 purpose-built flats to identify barriers to participation and wider expansion</p> <ul style="list-style-type: none"> With support from ReLondon, we will explore service delivery models and best practice case studies and decide service delivery model for borough wide expansion We will prepare a roll-out plan for separate food waste collections to purpose built flats in the borough not currently receiving the trial including procurement of food waste collection caddies, communal containers and collection vehicles We will develop a targeted communications campaign, targeting properties subject to change 	<ul style="list-style-type: none"> Prepare implementation plan 2023/24 Roll-out expected to start in April 2024 Aim for 30% purpose-built coverage by March 2025 Further expansion to more purpose-built flats in 2025/26 and 2026/27 Expected increase in recycling rate 	<p>The timetable is funding dependent</p> <ul style="list-style-type: none"> Prepare service model and implementation plan 2023/24 Roll out anticipated between April 2024 to March 2027 Develop communications plan February 2024 to June 2024 	
LB Tower Hamlets #4	<ul style="list-style-type: none"> Maximising recycling 	Reviewing the food and garden waste collection service for street level properties with a view to collect food waste from kerbside properties fully separate from garden waste	<p>This action is linked to, and will be implemented to coincide with action LB Tower Hamlets #4 above</p> <ul style="list-style-type: none"> We will explore appropriate service delivery models for collecting garden waste separately from food waste We will look to procure additional collection vehicles as necessary We will develop targeted communications campaign, targeting properties subject to change 	<ul style="list-style-type: none"> To respond to the government reforms within expected timescales 	<ul style="list-style-type: none"> Prepare implementation plan 2023/24 Agree disposal facility with contractor 2023/24 Develop communication materials end of 2023/24 	

Ref	Theme <ul style="list-style-type: none"> Waste Reduction Maximising Recycling Reducing Environmental Impact Maximising local waste sites 	Action title	Action Description	Expected Target / Impact	Timescale for action	WCA/WDA
LB Tower Hamlets #5	<ul style="list-style-type: none"> Maximising recycling 	Reviewing our waste and recycling collection policies to increase recycling	<p>A survey of the low-rise properties was completed in November 2022 and captured information on what containers were currently at the property and assessed if the property was suitable to house a 240L bin for recycling and a 240L bin for residual waste. This information will be used to inform any new policies</p> <p>The council operates a sack collection service for rubbish and recycling. Residents can buy their own container for rubbish and request a recycling wheeled bin (240l) from the council. However, the record of what types of bins are being used where is poor and incomplete</p> <ul style="list-style-type: none"> We will review our current service arrangements and will prepare report to recommend suitable policy and service changes to street level properties to drive more waste reduction and recycling We will also review our policies and service levels to flats and will propose suitable policies that will help drive behaviour change towards more and better recycling 	<ul style="list-style-type: none"> Report to Lead Member September 2023 on recommendations Clear guidance and service standards for kerbside properties developed 	<ul style="list-style-type: none"> September 2023-December 2024 	
LB Tower Hamlets #6	<ul style="list-style-type: none"> Maximising recycling 	Review and expand garden waste collection service to increase recycling	<p>Tower Hamlets provides a free collection service to houses/kerbside properties</p> <ul style="list-style-type: none"> We will explore options to expand free collection service to ground floor properties in purpose-built blocks of flats We will review frequency of collection (currently weekly), in line with our plans to separate the collection of food and garden waste Linked to the action #5 	<ul style="list-style-type: none"> To respond to the government reforms within expected timescales Increase the amount of garden waste collected in the borough Contribute to the overall recycling rate 	<ul style="list-style-type: none"> Agree disposal facilities with contractor 2023/24 	
LB Tower Hamlets #7	<ul style="list-style-type: none"> Maximising recycling 	Improving service delivery - Flats above shops	<p>The waste and recycling collection services are undergoing a route optimisation exercise with new rounds anticipated to be being implemented. Service changes implemented during this time will bring alterations to the collection times and frequencies to flats above shops on the main lines.</p> <ul style="list-style-type: none"> The service from flats above shops will be reviewed in 2023/24 to scope for improvements and identify an area to pilot a separate food waste collection service We will submit an expression of interest to ReLondon to take part in their improving recycling in flats above shops pilot programme 	<ul style="list-style-type: none"> Improved service delivery to FAS Increase in the amount of recycling and food waste collected and diverted from residual waste stream 	<ul style="list-style-type: none"> Monitoring Sept to Dec 2023 Review service Jan 2024 	
LB Tower Hamlets #8	<ul style="list-style-type: none"> Maximising recycling 	Expansion of commercial waste service to include food waste and promote recycling collection service	<p>The commercial waste service is undergoing reconfiguration to improve the service offer to our business customers.</p> <ul style="list-style-type: none"> We will implement new commercial waste collection rounds following the conclusion of the route optimisation project. We will develop and implement new communications material and website for the commercial waste service. Businesses will be encouraged to separate more waste for recycling Tower Hamlets Commercial waste service aims to utilise electric vehicles which will act as an everyday reminder of the borough's commitment, not just to environmental concerns such as recycling options, but also the drive to net zero. 	<ul style="list-style-type: none"> To respond to the government reforms within expected timescales Increased uptake of recycling services Contribute to the LACW recycling rate 	<ul style="list-style-type: none"> Route optimisation plan anticipated to be implemented late 2023 Deep dive of customer base and deliver further communications on service offer early 2024 Agree disposal facilities (food waste) with contractor 2023/24 Research and benchmark service offering for food waste April to Dec 2023 	
LB Tower Hamlets #9	<ul style="list-style-type: none"> Maximising recycling 	Improve recycling sack distribution	<p>Many properties including flats above shops and low-rise properties without front gardens do not have space to store a recycling bin and require sacks to use the recycling service. Those with recycling bins can use reusable recycling bags to store and carry recycling.</p>	<ul style="list-style-type: none"> Report for lead member 	<ul style="list-style-type: none"> October 2023 	

Ref	Theme <ul style="list-style-type: none"> Waste Reduction Maximising Recycling Reducing Environmental Impact Maximising local waste sites 	Action title	Action Description	Expected Target / Impact	Timescale for action	WCA/WDA
			<ul style="list-style-type: none"> We will review with the aim of improving recycling sack distribution 			
LB Tower Hamlets #10	<ul style="list-style-type: none"> Waste Reduction Reducing Environmental Impact 	Championing food waste reduction initiatives	<p>Championing food waste reduction helps us to reduce the overall amount of waste we have to manage.</p> <ul style="list-style-type: none"> We are working in partnership with ReLondon and other London boroughs on the Pan London sustainable food campaign We promote the national “Love Food Hate Waste” campaign and will undertake food waste reduction activities as part of Food Waste Awareness Week. Work in partnership with community groups and other organisations to promote other food waste reduction activities through stalls at community events and food waste reduction workshops Continue to promote and support home and community composting Support the Food Waste Solutions pilot which involves composting of food waste collected from residents and businesses by community partners Participate in the Circular food procurement Working Group: promote healthier and more climate friendly meals across council services; source food that is local and in season; recycle unavoidable food waste 	<ul style="list-style-type: none"> 2022 to May 2023 deliver Pan London sustainable food campaign Contribute to reduction in avoidable food waste 5 waste reduction events per year Reduction in food-related consumption-based emissions 	<ul style="list-style-type: none"> 2022 to May 2023 Pan London sustainable food campaign Ongoing TBC 	
LB Tower Hamlets #11 Page 406	<ul style="list-style-type: none"> Waste Reduction Maximising recycling 	Reuse, repair and recycling activities and events	<p>Events in our local communities help us to support residents to find ways to reuse and repair items and engage on a personal level.</p> <ul style="list-style-type: none"> The Recycling Improvement and Engagement Officers will hold 5 waste reduction events e.g., Give and take events, food waste reduction, repair, composting or mending workshops. The Recycling engagement team will host regular recycling information stalls at community events and hubs Use “Let’s rethink it” campaign assets at events and on social media 	<ul style="list-style-type: none"> A minimum of 5 waste reduction events per year A minimum of 10 community recycling stalls per year 	<ul style="list-style-type: none"> Ongoing 	
LB Tower Hamlets #12	<ul style="list-style-type: none"> Waste Reduction Maximising recycling 	Promoting waste reduction and recycling within the local community through the Recycling Champions Scheme	<p>Our Recycling Champions help us deliver our behaviour change activities and act as local advocates for recycling services in the area where they live.</p> <ul style="list-style-type: none"> We will engage with champions via meetings, newsletters, workshops and MRF visits. We provide champion volunteer opportunities at events organised by the Recycling Improvement and Engagement Team We promote the scheme via resident newsletter, Our East End and social media and will actively seek to sign up new champions Involve the Recycling Champions network on social media, make short video clips showing recycling behaviours or tips 	<ul style="list-style-type: none"> Minimum 6 newsletters per year Minimum of 6 volunteer opportunities per year 4 MRF visits/dedicated workshops per year 2-3 social media posts per year, 1 article or advert in Our East End and 1 article in the resident newsletter per year Make clips and promote on social media by October 2023 	<ul style="list-style-type: none"> Ongoing Ongoing 	
LB Tower Hamlets #13	<ul style="list-style-type: none"> Maximising recycling 	Education and behaviour change - Schools recycling programme	<p>The schools in Tower Hamlets help us to reach children and families and as organisations they take part in our recycling services.</p> <ul style="list-style-type: none"> We will deliver a minimum of 8 recycling education sessions at schools We will proactively support schools in improving their dry recycling and food waste recycling performance and reducing their waste 	<ul style="list-style-type: none"> A minimum of 8 education sessions per year Audit schools recycling facilities and provide advice on improving services 	<ul style="list-style-type: none"> Ongoing 	
LB Tower Hamlets #14	<ul style="list-style-type: none"> Maximising recycling 	Expand locations for the recycling of small WEEE and batteries	<p>Whilst a significant proportion of larger WEEE items get collected are sent for recycling via our bulky waste collection services, there is room for improving the capture of smaller WEEE items.</p> <ul style="list-style-type: none"> We will look to partner with a managing agent and trial small WEEE and battery collections from concierge offices We will work with Waste Operations and our disposal contractor to look for new opportunities to collect and recycle WEEE items 	<ul style="list-style-type: none"> Focus on one large managing agent Increase capture of small WEEE and batteries 	<ul style="list-style-type: none"> Start discussions with Managing Agent early 2023/24 Trial to commence in 2023/24 	

Ref	Theme <ul style="list-style-type: none"> Waste Reduction Maximising Recycling Reducing Environmental Impact Maximising local waste sites 	Action title	Action Description	Expected Target / Impact	Timescale for action	WCA/WDA
			<ul style="list-style-type: none"> We will explore options to expand collections of WEEE, including small WEEE, such as working with a third-party organisation 			
LB Tower Hamlets #15	<ul style="list-style-type: none"> Maximising recycling Waste Reduction 	Expand opportunities for residents to reuse and recycle textiles	<p>We are committed to exploring options for more textile reuse and recycling</p> <ul style="list-style-type: none"> We will approach managing agents/social landlords to house textile banks on their estates We will explore partnerships with charities and textile companies to set up a collection service 	<ul style="list-style-type: none"> Reduction in consumption-based emissions from reuse of textiles Contribution to overall recycling rate 	<ul style="list-style-type: none"> Start discussions with Managing Agent early 2023/24 Research April to June 2023 	
LB Tower Hamlets #16	<ul style="list-style-type: none"> Waste Reduction Maximising Recycling 	Collaboration with faith groups and targeted/local media to promote recycling and waste reduction	<p>We will work with faith-based groups across the borough to develop a plan of engagement activities to promote and establish local, and hyper-local, support for initiatives aimed at improving the quality and quantity of recycling and increasing reuse.</p> <ul style="list-style-type: none"> We will engage with faith groups to identify and create an action plan of activities We will promote communication and behaviour change messages through local media 	<ul style="list-style-type: none"> Engage with faith groups via the Inter-Faith forum, the Muslim Council of Britain and local mosques Hold a workshop with the aim of identifying how we can work together Create an action plan 	<ul style="list-style-type: none"> Initial engagement and calendar completed by October 2023 Ongoing 	
LB Tower Hamlets #17	<ul style="list-style-type: none"> Waste reduction 	Directory of repair / circular economy companies in the borough to promote/work with (any reuse schemes, refill shops, container reuse)	<p>We will look to provide better signposting on our website to help residents engage with reuse and repair networks.</p> <ul style="list-style-type: none"> We will create a webpage to promote the services of businesses involved in delivering circular economy principles, including electrical repair companies, furniture reuse and repair businesses, tool lending libraries in the borough We will promote Refill scheme via the Council's business support and town centre teams 	<ul style="list-style-type: none"> Raise awareness about reduction of single use plastics and waste reduction opportunities 	<ul style="list-style-type: none"> Start collating information and directory April 2023 Discussions with other council teams April 2023 	
LB Tower Hamlets #18	<ul style="list-style-type: none"> Waste reduction 	Promoting reduction of single use plastics	<p>Encouraging residents and businesses to reduce their reliance on single use plastic items is an important part of our behaviour change activities.</p> <ul style="list-style-type: none"> We will incorporate reducing use of single use plastics messages in schools' programme We will incorporate messages on reducing single use plastics as part of relevant communications campaigns, including during Plastic Free July We will signpost residents to zero waste shops 	<ul style="list-style-type: none"> Raise awareness on reduction of single use plastics 	<ul style="list-style-type: none"> Ongoing Plastic Free July 	
LB Tower Hamlets #19	<ul style="list-style-type: none"> Waste Reduction Maximising Recycling 	Improving waste reduction and recycling arrangements in new developments	<p>Tower Hamlets Reuse, Recycling and Waste SPD was adopted by the council in July 2021</p> <ul style="list-style-type: none"> We require developers to conform to the requirements of Tower Hamlets Reuse, Recycling and Waste SPD for new developments proposed in the borough We encourage developers to consider the "user journey" when designing new developments and to ensure adequate storage space is provided within each dwelling as well as for the communal storage areas. 	<ul style="list-style-type: none"> Improved waste and recycling storage and collection arrangements in new developments Expanding opportunities for greater reuse of waste from new developments Improving the "user journey" for residents in new developments 	<ul style="list-style-type: none"> Ongoing 	
LB Tower Hamlets #20	<ul style="list-style-type: none"> Waste Reduction Reducing Environmental Impacts 	Promoting waste reduction and Circular Economy principles in the business community	<p>As part of developing plans to deliver on A Cleaner and Greener Future for Tower Hamlets we have made a commitment to promote the Circular Economy and resource efficiency, encouraging waste reduction, reuse and sale of unwanted items</p> <ul style="list-style-type: none"> We engage with local businesses and create an environment for networking through our business breakfast events We will use The Circular Economy Matchmaker tool to help deliver on our plans 	<ul style="list-style-type: none"> Raise awareness of Circular Economy principles within the business community Encourage greater reuse of unwanted items Reduce commercial residual waste and contribute to LACW recycling rate 	<ul style="list-style-type: none"> Ongoing 	

Ref	Theme <ul style="list-style-type: none"> • Waste Reduction • Maximising Recycling • Reducing Environmental Impact • Maximising local waste sites 	Action title	Action Description	Expected Target / Impact	Timescale for action	WCA/WDA
LB Tower Hamlets #21	<ul style="list-style-type: none"> • Reducing Environmental Impacts 	Greening the waste collection fleet	100% of our waste and recycling fleet ULEZ compliant. We are undertaking a programme to electrify the whole fleet, which includes waste service vehicles <ul style="list-style-type: none"> • Phase 1: cars, vans and commercial vehicles- funding has been agreed for EV charging infrastructure • Phase 2: covers >3.5t, RCV, cage tippers- funding dependent 	<ul style="list-style-type: none"> • 50% of all smaller vehicles to be electric/hybrid by 2025 • All HGVs to be electric/hybrid by 2030 • Contributing towards the Mayor's zero carbon city 2030 target 	<ul style="list-style-type: none"> • 2022-2025 • Dependant on funding and the evolution of new technologies, i.e., hydrogen powered lorries 	

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Equality Impact Analysis Screening Tool

Section 1: Introduction

Name of proposal
For the purpose of this document, 'proposal' refers to a policy, function, strategy or project
Tower Hamlets Reduction and Recycling Plan 2023-2025 (RRP)
Service area and Directorate responsible
Operational Services, Place
Name of completing officer
Louise Houston, Environmental Services Improvement Team Leader
Head of Service
Richard Williams, Business Manager Operational Services

The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between those with 'protected characteristics' and those without them
- Foster good relations between those with 'protected characteristics' and those without them

This Equality Impact Analysis provides evidence for meeting the Council's commitment to equality and the responsibilities outlined above. For more information about the Council's commitment to equality, please visit the Council's [website](#).

Section 2: Summary of proposal being screened

Describe the proposal including the relevance of proposal to the general equality duties and protected characteristics under the Equality Act 2010
2.1 Introduction

Developing and producing an RRP is a requirement set by the GLA to ensure all London authorities are in general conformity with the London Environment Strategy. This second RRP covers a two-year period from April 2023 to the end of March 2025.

The RRP comprises environmental metrics drawn from the previous reporting cycle (2018-2022) along with plans to improve services and support residents to reduce their waste and recycle more. Some of these plans address expected national waste and recycling reforms outlined in the Government's Resources and Waste Strategy for England (2018).

The impacts of RRP actions on general equality duties and protected characteristics have been considered and are discussed below.

2.2 Housing

88.7% of households in Tower Hamlets live in a flat, maisonette or apartment, the second highest proportion in England and Wales after the City of London and was twice the proportion in the London region. The London average is 56%.

On average flat dwellers recycle half as much as those living in houses (ReLondon 2018).

Tower Hamlets has a high proportion of households who rent, both from social landlords and from private landlords whereas the proportion of owner occupiers is the lowest in England and Wales. 35.9% of households live in social rented accommodation and 38.2% of households live in private rented accommodation. Social and private renting is significantly higher in Tower Hamlets than the London and England and Wales average.

Tower Hamlets has the third highest number of HMOs in London. Census 2021 data indicates that there are 4,734 houses of multiple occupation in the borough. Tower Hamlets also has a greater proportion of larger households than both London and England and Wales. Houses with large families and HMOs are likely to be producing a larger amount of waste and recycling and require more storage capacity.

The RRP Actions (below) will seek to improve service provision equality for people living in flats.

- RRP Action #1: Improving recycling infrastructure for blocks of flats and estates and tackling contamination through implementing Flats Recycling Package (FRP) interventions. These improvements will include increased storage capacity and signage, where possible.
- RRP Action #3: Rolling out food waste collection service to purpose-built blocks of flats.
- RRP Action #7: Improving service delivery - Flats above shops (FAS)
- RRP Action #6: Review and expand garden waste collection service to increase recycling
- RRP Action #17 Improving waste reduction and recycling arrangements in new developments

There are two actions that will seek to improve service provision for kerbside properties, which are mostly houses converted into flats or houses.

- RRP Action #2: Increasing participation in the kerbside food waste collection service through re-promotion of the service
- RRP Action #5: Reviewing service offer to kerbside properties to increase recycling

2.3 Age - Young people

11.1% of children in the borough are aged between 5-14 years of age. The schools recycling programme will seek to engage this group and their parents/carers. Messages given to children at school may be taken home and result in behaviour changes in the household.

RRP Action #12: Education and behaviour change - Schools recycling programme

A UK-wide report in 2017 by SERCO found that less than half of all 16-34 year olds admitted that they do not recycle 'all that they can'. New poll shows millennials are least likely age group to recycle (serco.com).

3 RRP Action #10: Reuse, repair and recycling activities and events

Age - Older people

5.7% of the population are over 65. This cohort may find it more difficult to manage waste and recycling infrastructure due to age-related disabilities. In addition, this cohort may make greater use of items such as disposable medical products.

Members in this group may find it difficult to access information about services online, we therefore ensure that our communications include traditional printed media such as leaflets, posters and Our East End.

A clinical waste collection service and assisted collections are in place and will not be impacted by the RRP.

2.4 Race

There is a higher proportion of Asian, Asian British or Asian Welsh: Bangladeshi in Tower Hamlets than in London, and a lower proportion of White: British.

46.8% of residents were born outside of the UK. 7.8% have been resident in the UK for less than 2 years at the time of the census. The most common countries of birth other than the UK were Bangladesh, Italy, India, China and France. 14% of residents were born in a current EU country.

There may be potential language barriers and cultural differences, which may impact on recycling participation. This could be positive or negative because different cultures may have different purchasing or dietary habits.

Communication about recycling services is regularly reviewed and refreshed with consideration always given on how to be inclusive and representative of the community, including those with language barriers. For example, the "Let's rethink it!" campaign is currently raising awareness about correct recycling behaviours using outdoor and online advertising. A video about why it is important not to contaminate your recycling is being developed, with versions in both English and Bengali. All designs include imagery that is inclusive and reflects or diverse community.

We will seek to engage with different groups through targeted attendance at events/venues, partnership working with community groups and multi-channel communication. Engagement of recycling champions that reflect our borough may lead to increased participation in waste reduction, food collections and recycling services. Messages given to children at school may be taken home and result in behaviour changes in the household.

- 3 RRP Action #11: Promoting waste reduction and recycling within the local community through the Recycling Champions Scheme
- 4 RRP Action #10: Reuse, repair and recycling activities and events
- 5 RRP Action #12: Education and behaviour change - Schools recycling programme

2.5 Language proficiency in English

The most commonly spoken main languages other than English were Bengali (11%), Italian (2.2%), Spanish (1.7%), French (1.2%), and Portuguese (1%).

27% said they did not speak English as their first language. 5.2% of residents aged 3 and over said they could not speak English well and 1% said they could not speak English at all.

Improvement to infrastructure at blocks of flats includes provision of signage and new bin stickers with clear pictures which will help those with language limitations. We will continuously review our communications activities and seek to be inclusive e.g. attending ESOL events. Engagement of recycling champions that reflect our borough may lead to increased participation in waste reduction, food collections and recycling services.

- 3 RRP Action #1: Improving recycling infrastructure for blocks of flats and estates and tackling contamination through implementing Flats Recycling Package (FRP) interventions
- 4 RRP Action #10: Reuse, repair and recycling activities and events
- 5 RRP Action #11: Promoting waste reduction and recycling within the local community through the Recycling Champions Scheme

2.6 Disability

The proportion of residents in Tower Hamlets whose day-to-day activities are limited (a little and a lot) is slightly lower than the London average. The proportion of residents living in the borough with bad/very bad health is on a par with the London average.

12.9% of residents had a disability and 25.7% of households had at least one disabled person living within them.

Residents with reduced mobility due disability may find it more difficult juggle their waste and recycling from their home to the waste and recycle facilities. They may also struggle to manage the waste and recycling infrastructure (bins). Some residents with a disability may produce a greater amount of waste as a result of their disability (e.g. using disposable medical waste or sanitary products (including incontinence pads).

A clinical waste collection service and assisted collections are in place and will not be impacted by the RRP.

2.7 Religion or philosophical belief

Islam (39.9%) is the most common religion in Tower Hamlets.

There may be potential language barriers and cultural differences, which impact on recycling participation. This could be positive or negative because different cultures may have different purchasing or dietary habits.

We will engage with faith groups to identify and create a calendar/action plan of activities.

- 3 RRP Action #11: Promoting waste reduction and recycling within the local community through the Recycling Champions Scheme
- 4 RRP Action #10: Reuse, repair and recycling activities and events
- 5 RRP Action #17: Collaboration with faith groups to promote recycling and waste reduction

Section 3: Equality Impact Analysis screening

<p>Is there a risk that the policy, proposal or activity being screened disproportionately adversely impacts (directly or indirectly) on any of the groups of people listed below?</p> <p>Please consider the impact on overall communities, residents, service users and Council employees.</p> <p>This should include people of different:</p>	Yes	No	Comments
<ul style="list-style-type: none"> ▪ Sex 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The actions proposed in the RRP will have a positive impact on the services available and the environment.</p> <p>There is no estimated direct or indirect disproportionate impact of these proposals to communities, residents, service users or Council employees on the grounds of Sex.</p>
<ul style="list-style-type: none"> ▪ Age 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The actions proposed in the RRP will have a positive impact on the services available and the environment.</p>

			<p>Please refer to section 2.3.</p> <p>There is no estimated direct or indirect disproportionate impact of these proposals to communities, residents, service users or Council employees on the grounds of Age.</p>
<ul style="list-style-type: none"> ▪ Race 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The actions proposed in the RRP will have a positive impact on the services available and the environment.</p> <p>Please refer to section 2.4.</p> <p>There is no estimated direct or indirect disproportionate impact of these proposals to communities, residents, service users or Council employees on the grounds of Race.</p>
<ul style="list-style-type: none"> ▪ Religion or Philosophical belief 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The actions proposed in the RRP will have a positive impact on the services available and the environment.</p> <p>Please refer to section 2.7.</p> <p>There is no estimated direct or indirect disproportionate impact of these proposals to communities, residents, service users or Council employees on the grounds of Religion or Philosophical belief.</p>
<ul style="list-style-type: none"> ▪ Sexual Orientation 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The actions proposed in the RRP will have a positive impact on the services available and the environment.</p> <p>There is no estimated direct or indirect disproportionate impact of these proposals to communities, residents, service users or Council employees on the grounds of Sexual Orientation.</p>
<ul style="list-style-type: none"> ▪ Gender re-assignment status 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The actions proposed in the RRP will have a positive impact on the services available and the environment.</p> <p>There is no estimated direct or indirect disproportionate impact of these proposals to communities, residents,</p>

			service users or Council employees on the grounds of Gender re-assignment.
<ul style="list-style-type: none"> ▪ People who have a Disability (physical, learning difficulties, mental health and medical conditions) 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The actions proposed in the RRP will have a positive impact on the services available and the environment.</p> <p>Please refer to section 2.6.</p> <p>There is no estimated direct or indirect disproportionate adverse impact of these proposals to communities, residents, service users or Council employees on the grounds of Disability.</p> <p>Residents with disabilities already have access to assisted waste and recycling collection services.</p>
<ul style="list-style-type: none"> ▪ Marriage and Civil Partnerships status 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The actions proposed in the RRP will have a positive impact on the services available and the environment.</p> <p>There is no estimated direct or indirect disproportionate adverse impact of these proposals to communities, residents, service users or Council employees on the grounds of Marriage and Civil Partnership status.</p>
<ul style="list-style-type: none"> ▪ People who are Pregnant and on Maternity 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The actions proposed in the RRP will have a positive impact on the services available and the environment.</p> <p>There is no estimated direct or indirect disproportionate adverse impact of these proposals to communities, residents, service users or Council employees who are Pregnant or on Maternity.</p>
<p>You should also consider:</p> <ul style="list-style-type: none"> ▪ Parents and Carers ▪ Socio-economic status 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The actions proposed in the RRP will have a positive impact on the services available and the environment.</p> <p>Housing is one of the measures of deprivation. Please refer to section 2.1.</p>

<ul style="list-style-type: none"> ▪ People with different Gender Identities e.g. Gender fluid, Non-binary etc. ▪ Other 			<p>There is no estimated direct or indirect disproportionate adverse impact of these proposals to communities, residents, service users or Council employees who are Parents and Carers or people with different Gender Identities or Socio-economic status.</p>
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If you have answered **Yes** to one or more of the groups of people listed above, a **full Equality Impact Analysis is required**. The only exception to this is if you can 'justify' the discrimination (Section 4).

Section 4: Justifying discrimination

Are all risks of inequalities identified capable of being justified because there is a:	
(i) <i>Genuine Reason</i> for implementation	<input type="checkbox"/>
(ii) The activity represents a <i>Proportionate Means</i> of achieving a <i>Legitimate Council Aim</i>	<input type="checkbox"/>
(iii) There is a <i>Genuine Occupational Requirement</i> for the council to implement this activity	<input type="checkbox"/>

Section 5: Conclusion

Before answering the next question, please note that there are generally only two reasons a full Equality Impact Analysis is not required. These are:

- The policy, activity or proposal is likely to have **no or minimal impact** on the groups listed in section three of this document.
- Any discrimination or disadvantage identified is **capable of being justified** for one or more of the reasons detailed in the previous section of this document.

Conclusion details

Based on your screening does a full Equality Impact Analysis need to be performed?

Yes	No
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<input type="checkbox"/>	<input checked="" type="checkbox"/>
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If you have answered **YES** to this question, please complete a full Equality Impact Analysis for the proposal

If you have answered **NO** to this question, please detail your reasons in the 'Comments' box below

Comments
There is no estimated direct or indirect disproportionate impact of these proposals to communities, residents, service users or Council employees with any protected characteristic. The actions in the RRP will have a positive impact on services and the environment.

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<p>Cabinet</p> <p>20th September 2023</p>	
<p>Report of: Caroline Holland, Interim Corporate Director of Resources</p>	<p>Classification: Unrestricted</p>
<p>Tower Hamlets Customer Experience Strategy 2023-26 Post Consultation</p>	

Lead Member	Councillor Kabir Ahmed
Originating Officer(s)	Raj Chand, Director of Customer Services Leah Sykes, Head of Customer Service Keiko Okawa, Strategy and Policy Lead, Place and Resources Tope Alegbeleye, Strategy and Policy Officer, Strategy, Policy and Improvement for Place and Resources
Wards affected	All
Key Decision?	No
Reason for Key Decision	N/A
Forward Plan Notice Published	19/07/2023
Exempt information	N/A
Strategic Plan Priority / Outcome	[Priority 8 “A council that listens and works for everyone from the Strategic Plan 2022-26]

Executive Summary

This report presents the final version of the Tower Hamlets Customer Experience Strategy 2023 -2026 (Appendix A). Public engagement of a draft strategy occurred from 5 June till 7 July and the council staff consultation from 21 June till 7 July. Feedback and comments from the public, business and the council staff are incorporated into the final draft of the strategy.

The public engagement of residents and businesses were commissioned. Feedback from the residents is generally very positive. There is also overwhelming support for the strategy’s vision and each outcome. There were low levels of dissatisfaction attributed to the council’s current achievement of these outcomes although a significant number picked a neutral option due to mixed opinions. The business survey also shows overwhelming support for the vision and outcomes, although their views towards their experience of contacting the council was not as favourable as the residents’.

Recommendations:

The Mayor in Cabinet is recommended to:

1. Note the outcome of the public and staff engagement that informs the Tower Hamlets Customer Experience Strategy 2023-26.
2. Agree the Tower Hamlets Customer Experience Strategy 2023-26.

1 REASONS FOR THE DECISIONS

- 1.1 The Tower Hamlets Council Strategic Plan 2022-2026 includes a policy “Maintain face to face services for those who need them while providing a better-designed, streamlined digital offer for residents who want to access services online” under Priority 8 “A council that listens and works for everyone”. This strategy is being developed to deliver this policy.
- 1.2 The council have an aspiration that all customers benefit from accessible and high-quality services regardless of channel. We know that we need to change and improve our approach to customer service, whilst over the last 4 years we have greatly improved the online offer, the way we currently provide customer services is still largely based around having contact by phone. Too many follow-up contacts are still being made and the main reason for contact is to report a problem or request information. The strategy sets out how the council improve the efficiency and effectiveness of the customer service offer.

2 ALTERNATIVE OPTIONS

- 2.1 “Do nothing” option. The council could choose not to have a customer experience strategy. This would mean a continuation of the status quo, which would limit the council’s ability to transform the delivery the experience our customers receive when accessing our services.

3 DETAILS OF THE REPORT

Background

- 3.1 Tower Hamlets has the fastest growing population and the highest population density in England and Wales. The borough has also one of the youngest, and most diverse populations in the UK. The borough had the largest increased in the number of households in the country between the 2011 and 2021 census. A consequence of the cost-of-living crisis means an increase in service demand and assistant given to residents, businesses, and other users of our services. Demands for the council services are expected to increase and are complex.

- 3.2 Increasingly more service users expect a better-designed, streamlined digital offer. In 2021, 92% of the borough households had the internet at home, which is on in line with the national level. The use of digital technology has become important in the delivery of customer service. The council seeks to provide a high-quality customer experience in the digital age to help meet increasing demand for services.
- 3.3 At the same time, some residents do not use the Internet and choose face to face and/or telephone to contact the council. Research shows that a small proportion of adults (14% nationally) do not use the Internet. The strategy sets out the way we provide the service for all our customers, regardless of their needs and preferences to contact the council.
- 3.4 This strategy shows our commitment to delivering consistent and high-quality customer service that will increase the satisfaction of our residents. In the mid-pandemic resident survey 2021, only 32% of respondents agreed that “my council is doing a good job”. We want to change that by listening to our customers and meeting their needs.

Summary of the Strategy

- 3.5 The Tower Hamlets Customer Experience Strategy (Appendix 1) sets out our vision, customer promise, desired outcomes and measures.
- 3.6 The customer experience vision is “**Public service is at the heart of what we do. The council will listen and with a commitment to service excellence, work collaboratively internally and in partnership with our voluntary and community services to design and deliver fit for purpose services across the council**”. To achieve the vision, the strategy is committed to delivering three key outcomes:
- **Outcome 1:** Council services are easily accessible, and inclusive.
 - **Outcome 2:** Utilise feedback, data, technology and innovation to improve services.
 - **Outcome 3:** Embed a customer-focused culture to deliver an excellent customer experience.
- 3.7 Underpinning each priority will be several clear objectives, which aims to ensure that we communicate clearly to our customers what we are able to offer them and in turn outlines are expectations of our customers.

How was the Strategy Developed

- 3.8 In developing the strategy, it was essential that we engaged and consulted with staff, customers and our key stakeholders, including the Institute of Customer Service.
- We held various events designed to give staff the opportunity to feed into the strategy as it develops.

- This included Customer Service Smarter Working POD sessions, including two POD sessions, held last October during the National Customer Service Week.
- In conjunction with the Institute of Customer Service, we launched an internal staff survey, designed to assess staff views on how the council's strategy, organisation, culture, and processes enable them to deliver excellent customer service. More than three hundred staff completed the staff survey.
- A Customer Service Steering Group has been established, consisting of officers and managers from a wide range of services across the council as well as external partners from the East London Business Alliance, THCVS and the Institute of Customer Service. The Steering Group plays a critical role in providing feedback and oversight in the development of the strategy.
- Members have been engaged. An article on the development of the strategy was published in Member's bulletin in October 2022
- To gain feedback from the users of our services, an external customer survey was carried out to draft a strategy.

3.9 To ensure that our strategy is driven by evidence, we have reviewed national, regional and local data (Appendix 6).

3.10 The Customer Experience Strategy, has noted and considered other Tower Hamlet strategies and plan, including the: -

- Strategic Plan 2022-2026.
- Digital Inclusion Strategy
- Communications Strategy 2021-22
- IT strategy
- The complaints process - [The complaints process \(towerhamlets.gov.uk\)](https://towerhamlets.gov.uk)
- Potentially Violent Persons Procedure (emerging)
- Customer Code of Conduct (emerging)

3.11 To ensure that the Customer Experience Strategy takes into account good practice and can be benchmarked against other public sector organisations, we have worked and consulted with the Institute of Customer Service.

Public Consultation Summary

3.12 The draft Strategy was launched for public consultation on 5 June running until 7 July. To ensure that a cross section of the community was able to engage in the consultation the following engagement methods has been used.

- Resident survey (face to face and telephone, commissioned): 1,108 resident samples. The survey participants largely correspond with the demographic make-up of the borough as identified by the 2021 census. Below are breakdowns of the survey participants:
 - Male – 50%, Female – 50%

○ Age groups

16-24	16%
25-34	28%
35-44	23%
45-54	16%
55-64	11%
65+	7%

○ Ethnic background

White	50%
Mixed	3%
Asian	37%
Black	8%
Other	1%

○ Wards

Whitechapel	6%
Weavers	4%
Stephney Green	4%
Bethnal Green West	6%
St Katharine's & Wapping	4%
St Dunstan's	4%
Spitalfields & Banglatown	4%
Shadwell	5%
Poplar	3%
Mile End	6%
Limehouse	2%
Lansbury	7%
Island Gardens	5%
Canary Wharf	6%
Bromley South	5%
Bromley North	4%
Bow West	5%
Bow East	6%
Blackwall & Cubitt Town	7%
Bethnal Green East	7%

- Business survey (face to face and telephone, commissioned): 50 business samples.
- Let's talk Tower Hamlets online survey: for residents and businesses: 18 people responded.
- Council staff survey (online, 21 June-7 July): 145 responded.

The number of people completing the survey on Let's Talk Tower Hamlets was low. The commissioned residents survey feedback provides robust information on the views of residents and businesses. Detailed analysis of the survey responses can be found in Appendix 2, 4 and 7

Engagement analysis

3.13 The survey results have informed the final strategy. Below are key findings arising from the survey results:

Support for the vision and outcomes

- Both resident and business survey respondents overwhelmingly support the strategy's vision and outcomes: 94%-96% of the residents and 94%-100% business respondents supported them.
- Substantial council officers supported the strategy vision and outcomes (60%-77%).

Support for the Customer Promise

- A huge majority of residents (95%) and businesses (98%) find that the Customer Promise is clear about what our customers can expect from us and what we expect from our customers.
- Most staff (76%) also agree with it.

Rooms for improvement

- The survey feedback underpins our original finding, which is, we have rooms for improvement in our customer service delivery. Businesses have harsher views towards our practices than residents.
- Not many staff respondents (31%) had an opportunity to attend customer service training.

3.14 In the resident survey, the respondents were asked a question on their views about their experience with the council, i.e., 'Thinking about your most recent experience with the council, please state to what extent you agree with the statements below'. The table below shows the results:

Statement	Agree	Disagree	Neither agree nor disagree
Staff were helpful and polite	83%	1%	16%
Staff had sufficient knowledge	76%	1%	22%
Able to access the information and service easily	67%	3%	30%
Responded to me at the agreed timescale	66%	3%	31%
Get through to the right person at the first contact	56%	6%	38%

As the evidence pack (Appendix 6) shows, the Mid pandemic resident survey 2021 (1,108 samples) included questions related to customer service. The table below shows the results to the question, 'What extent do you agree or disagree with the following statements?'

Statement	Agree	Disagree	Don't know
My council has staff who are friendly and polite	73%	16%	11%
My council is difficult to get through to on the phone	59%	27%	14%

My council responds quickly when asked for help	44%	42%	13%
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It should be highlighted that the questions of these two surveys are different, and we cannot simply compare between them. However, 83% of the respondents of the resident survey of this time agreed with 'Staff were helpful and polite' and 73% of the respondents of the mid pandemic resident survey agreed with 'My council has staff who are friendly and polite'.

- 3.15 The engagement analysis shows the draft strategy is supported by the external and internal stakeholders. The final version of the strategy remains the same as the draft version.

Action plan

- 3.16 The analysis also supports our views that our practice around customer service needs to be substantially improved. Once the strategy is agreed, we will develop an action plan to achieve the vision and outcomes set out by the strategy. The feedback will inform the development of actions. Actions arising from the engagement will include engaging businesses to improve our customer service provision for them and making customer service training widely available for the staff.

- 3.17 The delivery of an action plan and future business cases will be reported back to and monitored by the Transformation Board, CMT and the Mayors Office. Business cases will be costed and taken through the annual budget process for transformational projects. The council services will continue being engaged to deliver the action plan and improve our customer service provision.

4 EQUALITIES IMPLICATIONS

- 4.1 An Equalities Analysis is attached (Appendix 3). The strategy aims to improve the experience that customers receive when engaging the services. The aspiration of the council is to provide a consistent service regardless of the channel chosen to communicate with the council. It is considered the strategy will benefit groups that have issues to access the council. For example, people aged 65 and over are less likely to have access to the Internet. The provision of the Resident Hub enables them to receive face to face support from the council.

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 Best value authorities are under a general Duty of Best Value to “make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness.” This strategy will help deliver the Best Value requirement by collecting and reviewing data to improve the customer service provision and providing more efficient and effective customer service.

6 COMMENTS OF THE CHIEF FINANCE OFFICER

6.1 The action plan will have costs associated with it which are not quantified at this stage.

7 COMMENTS OF LEGAL SERVICES

7.1 As stated in Paragraph 5.2 the Public Engagement and resultant Strategy assists the Council in meeting its Best Value duties as required by the Local Government Act 1999 section 3.

Linked Reports, Appendices and Background Documents

Linked Report

- None

Appendices

- Tower Hamlets Customer Experience Strategy (Appendix 1)
- Tower Hamlets Customer Experience Strategy Business survey results PowerPoint (Appendix 2)
- Customer Experience Strategy Equalities Analysis (Appendix 3)
- Tower Hamlets Customer Experience Strategy council staff survey results (Appendix 4)
- Tower Hamlets Customer Experience Strategy Residents survey results PowerPoint (Appendix 5)
- Tower Hamlets Customer Experience Strategy Evidence Base (Appendix 6)
- Tower Hamlets Customer Experience Strategy Residents survey results – Let’s talk Tower Hamlets (Appendix 7)

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

- None

Officer contact details for documents:

Raj Chand, Director of Customer Services
Leah Sykes, Head of Customer Service

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Tower Hamlets Customer Experience Strategy 2023-26



Foreword

We are pleased to introduce the Tower Hamlets Customer Experience Strategy 2023-2026 – the Council’s first ever customer experience strategy. Excellent customer service is important because it is the interface that connects us with our residents. The Customer Experience Strategy sets our commitment to improve and enhance the experiences our residents have when accessing our services.

Tower Hamlets is a special place. Our borough has the fastest population growth and the highest population density in the country. The borough has attracted people from all backgrounds. Yet, the level of poverty remains high both among children and older people. Our ambition is to help residents build better lives and maximise life opportunities in the borough wherever we can.

As stated in the Tower Hamlets Council Strategic Plan 2022-26, we are determined to be a council that listens to and works for everyone. While more people enjoy digital access in the borough, we are also aware some do not have access or are unable to use digital devices and channels. We will maintain face to face services via our Resident Hubs for those who need them, while providing a better-designed, streamlined digital offer for residents who want to access services online and via other channels such as social media, telephone, and our website.

Our residents are likely to seek our support, especially when they are facing difficulties in their lives. The ongoing cost-of-living crisis is an emergency. Many people are struggling to buy enough food and/or pay rent and heating. This has a huge impact on health and wellbeing. It is our aim to ensure we enable access to our services, and that residents receive necessary support as easily and quickly as possible.

This strategy sets out our vision to deliver against this commitment and will connect the council with our residents, facilitating their easy access to our services and helping them secure a better future. We will also work collaboratively with our partners, local communities, and individuals to help deliver and shape a positive customer experience.

Lutfur Rahman,
Mayor of Tower Hamlets

Cllr Kabir Ahmed,
Cabinet Member for Regeneration,
Inclusive Development
and Housebuilding
(Lead for Customer Experience)



Why do we need a strategy?



Tower Hamlets has an aspiration that all customers will benefit from accessible and high-quality services regardless of the channel they use.

We know that we need to change and improve our approach to customer service, whilst over the last four years we have improved the online offer, the way we currently provide customer services is still largely based around having contact by phone. We experience many follow-up calls/contacts, which is a drain on the council's limited resources.

We need to continue to invest in technology to streamline and simplify our services, enabling us to manage demand more effectively and release capacity for those with more complex needs.

We will embed a 'digital by design' culture across the Council in recognition that our customers want a more immediate, personalised service and expect to be able to contact us 24 hours a day, seven days a week. We want our customers to have access 24/7 to as many of our services as possible and give them the right information first time, quickly and easily.

For those customers with more intensive needs, we will provide a good-quality assessment and referral service either via the phone or face to face based on the customer's needs.

We need to drive new ways of working and transform how we deliver our services, focused on understanding the customers experience, expectations and needs.

We need to manage the growing demand for our services, supporting our customers to self-help wherever possible and embracing technological solutions where possible.

The financial environment around the council will continue to be challenging over the next few years. Recent high inflation has caused increases in fuel and energy costs which means council services cost more to deliver than they did before.

To support our customers and protect them from the negative impact of the cost-of-living crisis, the council continues to make significant investment in services. To provide financial support to those customers experiencing financial hardship, the Mayor approved an initial £2.7 million cost of living relief package a further £700,000 has been allocated to the tackling poverty programme and £1.2m to opening Resident Hubs across the borough.

At the same time, we will need to make significant savings over the medium term to ensure the council's budget is balanced and sustainable going forward, meaning it is important for us to provide solutions at the first point of contact avoiding repeat requests.

We are determined to ensure the services we provide deliver better outcomes for our residents, as such our commitment to bring the Leisure Centres in-house will provide us the with an opportunity to provide a more inclusive programme for our residents. We have set aside £35 million to deliver new leisure facilities on the St George's site, which will deliver better facilities for residents.

We understand that housing concerns is a major priority for our residents, the decision to bring Tower Hamlets Homes in-house supports our aspiration to provide a joined up service and best value to our residents.

Similarly our procurement practices, enables us to work with suppliers to deliver economic, social and environmental benefits for our community, through social value, whilst supporting the voluntary and community sector in the borough.

Our staff are critical in ensuring our customers receive the best possible experience and we will invest and train our staff to deliver our customer care standards and promise, maximising the value they provide at every interaction.

In delivering our Customer Experience Strategy, we will ensure our culture is customer centric and by working together, we can ensure that we make Tower Hamlets the best it can be.

Our TOWER values commit us to working together, listening to, and understanding what our customers need and respond appropriately to put in place affordable services equally and responsibly.

Our vision is that our customers will receive an excellent experience when contacting the council for a service, regardless of the channel they use.

This strategy is committed to deliver 3 key outcomes:



Outcome 1:

Council services are easily accessible, and inclusive.



Outcome 2:

Services are improved by using feedback, data, technology and innovation



Outcome 3:

The council embed a customer-focused culture to deliver an excellent customer experience.



Our Borough, Our Customers

Tower Hamlets has the fastest population growth and the highest population density across England and Wales. The borough is also one of the youngest, and most diverse populations in the UK, it is important to understand and predict how these changes will impact and subsequently inform the way we provide our services in the future.

Our borough's strength lies in its diversity and the different communities and cultures living side by side. We want Tower Hamlets to be safe, welcoming and a place of opportunity for all.

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. Some of these services, such as homelessness advice and support, are provided when people ask us for help. Others, such as child protection or enforcing planning rules, are part of our duties to look after people and the borough.

Within the context of this strategy, our "customers" are anyone who needs or chooses to interact with us. This includes residents, businesses, visitors, partners, community groups and staff.



310,300 Total population (2021)



156 languages are spoken in Tower Hamlets



Tower Hamlets has the fastest growing population nationally. The local population has grown by 22.1% from 254,100 in 2011. Nationally, population growth has been much slower over the decade since 2011 (6.6%).



Tower Hamlets is the most densely populated borough in England with 15,695 residents per square kilometre.



The working age population has increased by 25% since 2011. 220,300 residents are aged between 20 – 64 in 2021.



Tower Hamlets has seen the largest increase in total number of households of any local authority area across England and Wales. Between 2011 and 2021, an additional 19,200 households have been formed, representing a 19% increase since 2011.



Tower Hamlets has a young age profile. It is the only local authority area where less than 6% of residents (5.6%) are aged 65+



In 2021 there were 139,540 domestic properties (Valuation Office Agency, 2021)



There are 16,855 businesses in Tower Hamlets. The majority of these – 89% are 'micro' enterprises with less than 9 employees. (ONS IDBR, 2021)



The rising cost of living was the top issue for Londoners (77%) of the respondents, followed by housing affordability (58%) ISPOS Dec 22



Typical households' incomes are set to fall by 4% (of £1,100) in 2023/24 (Resolution Foundation Mar 23)

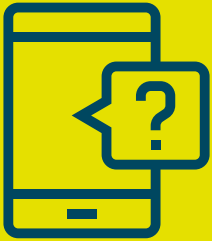
What do we know about our current customer experience?

The Institute of Customer Service envisages an organisation which provides excellent customer services as: "A world where customer experience makes a positive and sustained impact on individuals, organisations, society and the economic wellbeing of the UK."

Demand for council services is high and constantly changing and it is expected to continue to grow suggested by the trends in the demographic changes and the economy. Almost half of the borough population were born outside of the UK and many languages are spoken in the borough. A study by the Resolution Foundation shows that households finances will remain squeezed in 2023/24 and beyond.

We know that we provide a wide range of services to our customers, and we know that the experience will differ depending on the service accessed and the way in which it is accessed. We also know that as a public service provider it is important that customers can trust us to design services which respond to their needs and the needs of the local area and that these are delivered in a way which provides value for their money.





Increasingly more service users expect a better-designed, streamlined digital offer. In 2021, 92% of the borough households had the internet at home, which is in line with the national level. The use of digital technology has become important in the delivery of customer service. The council seeks to provide a high-quality customer experience in the digital age to help meet increasing demand for services.

At the same time, some residents do not use the Internet and choose face to face and/or telephone to contact the council. Research shows that a small proportion of adults (14% nationally) do not use the Internet. The strategy sets out the way we provide the service for all our customers, regardless of their needs and preferences to contact the council.



We receive over 340,000 phone calls every year. (ACD technology only) We currently have over 20 external telephone numbers, one corporate contact centre and six mini contact centres. 59% of those who responded to the 2021 Residents' Survey told us that it was difficult to get through on the phone.

Our website does not consistently allow people to interact for all our services simply and easily. This means that people must contact us via phone or have a face-to-face meeting, which costs us much more money to handle, and also leads to dissatisfaction when customers are waiting to speak to someone.



The most popular method of contact is currently by phone. In 2019, 75% of people surveyed contacted the council by phone. We also know that many of our residents have access to the Internet and can use online self-service.

The Annual Residents' Survey 2021 found that:

95% of residents have access to the internet.

92% of residents browse the internet for information about goods and services.

86% of residents use internet banking.

81% of residents shop online.

Face-to-face contact is the most expensive form of customer contact, costing approximately £16 for each contact. Contact by phone and online is cheaper. Contact by phone costs us approximately £6 for each call. The Government estimates that online contact is generally, 20 times cheaper than a telephone call and a staggering 50 times cheaper than face-to face contact.

Our customers also tell us that it is difficult to get through on the phone. The current contact methods are not sustainable as they are inefficient, expensive, and do not offer good customer service consistently.

Customer expectations that have grown since 2020

- Quality online experience couple with option to speak to a person.
- Responsiveness, speed, and simplicity
- Quality of products and services
- Organisations demonstrate environmental sustainability and enable sustainable choices.
- Ethical behaviour and governance
- Transparency
- A need for reassurance and trusted advice

Customers behaviours that have increased since 2020

- Recycling more
- Vigilance about value and costs
- Increased use of digital channels to interact with organisation but less social media usage.
- Determination to hold organisations to account.
- Increased levels of anxiety

- A growing divergence in financial, physical, and mental well-being
 - Increase risks of vulnerability and exclusion

Accessing council services



4,428,827
Website visits



164,436
Digital forms completed
(April- March 2023)

11,000
visits to Residents' Hub
(April 22 – March 23)



342,807
Telephone calls
(April 22 – March 23, ACD
technology only)



1,150,000
visits to Libraries and Idea
Stores (April 21- March 22)



73%
thought the council staff
were friendly and polite.

59%
found the council is
difficult to get through to
on the phone.



only
44%
of those that completed
the survey felt the council
responds quickly when
asked for help.



Over
900
digital forms available

Feedback from customers and staff indicated the following areas need to be focused on:

Need to put the customer at the centre of any service design/redesign and transformation.

Consistent delivery of services across 'all channels' of a high standard.

Focus on **'first point of contact resolution'** where possible.

Ensuring **joined up services** with easy access to information.

Partnership working

Focus on the customer experience and continuous improvement from **customer feedback**.

Review and update our **Customer Service Promise**

Reduce the time council services take to respond to phone calls and emails sent by service users.

Share customer experience performance with key external stakeholders.

Involve customers in the development of new services.

Our vision

“Public service is at the heart of what we do. The council will listen and work collaboratively internally, with other agencies and in partnership with our voluntary and community services to design and deliver fit for purpose excellent services.”

The council will ensure all customers who interact with us will have a positive experience irrespective of their channel of choice when they contact us. We will work across the council and with relevant partners to ensure that our customers consistently have a positive customer experience from collaborative and holistic service provision.

We will regularly review and update our customer service systems and technology to design services that add value to the customer experience and reduce costs / unnecessary steps for our customers. We will ensure:

- The approach is embedded in the council at all levels.
- Our staff are trained to achieve the vision and promote customer focus.
- The council design and review the customer experience, informed by user feedback, insight, and data.
- The council works with our partners to provide joined up services.
- The council provides channels to meet our residents' needs.
- Make use of digital technologies where suitable
- A flexible approach to designing services around customer demand.

We recognise that for the customer experience to be excellent, we need to become much more focused on the customer experience at each stage of the journey. To achieve this, we have developed a customer promise that will help us deliver our vision, improve the customer experience regardless of channel and achieves the outcomes we have set out in this strategy.

Our Customer Promise

This Customer Promise commits us to:

- Put customers at the heart of everything we do.
- Deliver services efficiently and effectively.
- Deliver a high standard of service.
- Regularly ask for feedback and use it to shape how we deliver services.
- Provide consistently good customer service across all channels.
- Be a customer-centric council

By always:

- Being helpful and polite.
- Providing honest and accurate information.
- Responding as quickly as possible.
- Giving our name
- Being clear and provide realistic time scales.

In return we ask that customers:

- Be respectful and treat our staff and other customers with courtesy.
- Let us know as soon as possible if your personal circumstances or requirements for a service change.
- Provide us the correct information we need to assist you.
- Engage with us in a way that supports our work and enhances the outcomes for everyone.
- Share your feedback and suggestions on how we can improve our services.

What do we want to achieve?

To deliver the strategy we will implement an action plan. Our outline action plan has been developed under three outcomes and objectives identified to deliver our vision:

Outcome 1:

Council services are easily accessible, and inclusive.



Our customers deserve excellent services, including customer service. Our services should be inclusive and accessible for all customers, who should be able to access the services easily.

We know that it is frustrating for our customers to contact us a few times to solve an issue, answer the same questions multiple times or wait for a response for a long time. We also acknowledge that our customers' choices for contacting us vary. Some people prefer 24/7 contact digitally others face to face. We aim to provide an excellent customer experience consistently regardless of the channel used to contact us.

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, this will also help them in other areas of their lives, such as getting information about jobs, or getting a better deal from their energy provider.

We aim to make the website as easy to understand as possible, only 18% of the website is in plain English, by making it easy and clear for customers to get access to services and information online, we will reduce the need to contact us via other channels.

We will continue to provide digital assistance for those who need support (for example, people with disabilities or those whose first language is not English).

The council and the borough's Voluntary and Community Services are working together to support our most vulnerable residents and offer face to face (by appointment), over the phone or virtual advice across a range of services via the resident hubs.

We will support more vulnerable residents through early action to make sure that services and resources are provided where they are most needed and prevent problems becoming bigger and more costly over time.

Our approach to customer service will take account of our residents' needs and people will be supported in different ways. For example, for those who lack confidence or need help going online, assisted self-service will be available across various channels. We also want to empower customers to self-serve.

Objective 1:

The council help our customers reach relevant services as quickly as possible, including by signposting them to correct and relevant services at the earliest possible opportunity.

Objective 2:

Our services are inclusive and accessible for all customers.

Objective 3:

Ensure more services are available digitally.

Objective 4:

Ensure all communication is relevant and timely.

What do we want to achieve?

Outcome 2:

Services are improved by using feedback, data, technology and innovation.

We believe the improvement of our service, in fact, all our decision-making, should be informed by evidence and data. The council will continuously improve customer experience using data and information.

Collected data and information on customer experience may include who our customers are, customers' satisfaction and needs, council staff's views towards our customer service and complaints on customer experience.

We will analyse customer activity, to understand what services they use, and identify root cause.

We will utilise data to identify early involvement, as this could prevent more problems arising in the future. By acting early, we can help our customers to avoid becoming homeless, or having children taken into care. It will also help to reduce pressures on high-cost services.

We know our service users prefer information being found and issues solved as quickly and smoothly as possible.

Technology and innovation are essential for any business that wants to succeed in today's environment. They can help to improve their efficiency, productivity, performance, problem-solving, adaptability and growth.

It is also important the technology we use is fit for purpose, reliable and easy to use for our customers and council staff. Furthermore, technology can enable us to collate data easily. Therefore, we aim to introduce relevant technology to serve our community.

We will use the [Government Digital Service design principles](#) in everything we do. We know we need to make things more efficient and simpler by removing unnecessary process steps.

59% customers said they felt it was difficult to get through on the phone and only 44% of customers felt the council responded quickly.

Objective 1:

Introduce an approach to collect customer feedback systematically.

Objective 2:

Routinely use data and information, including performance and complaints data, and best practice, to inform and improve services to make them relevant to customers.

Objective 3:

Ensure all customer service channels are effectively working.

Objective 4:

Use the best possible technology, that is easy for our customer to use.

Objective 5:

Implement new technology that will help better serve our customers and improve efficiency.

Objective 6:

Design our processes and systems with the customer in mind.

What do we want to achieve?

Outcome 3:

The council embed a customer-focused culture to deliver an excellent customer experience.



Embedding customer service culture in the council at all levels will help us achieve excellent customer experience. Such culture will build a foundation for innovation and improvement of customer service. To develop a customer service culture, we will involve staff in decision making in the design and improvement of services and encourage staff to improve their customer service skills.

The council will provide training opportunities for staff to improve their customer service skills, including digital skills and working with other services and partners.

It is critical for both the council as a service provider and service users to share what to expect from our services and what the council expect from service users.

Clear communication is key to achieve this. For example, the council will keep our customers up to date on progress, provide information through various channels, and communicate in different languages where needed.

Our new customer promise and customer care standards will clarify what our customer can expect from our service, we will also make it clear what we expect from our customers, we will develop a customer code of conduct.

We understand that, in times of trouble or distress, people may act out of character, and, in a very small number of cases, may behave in an unacceptable way, this makes it difficult for us to help customers effectively. We also have a duty to protect the welfare and safety of our staff and other customers. They should be able to come to work without fear of violence, abuse, harassment, or discrimination.

Our aim is to complete enquiries in one contact. If we are unable to, we will do our best to provide our customers with updates and realistic time frames.

Objective 1:

Introduce quality standards and professional accreditation.

Objective 2:

All staff have the knowledge and skills to deliver an excellent customer experience.

Objective 3:

Routine reporting on performance and customer satisfaction.

Objective 4:

Customer and staff are clear about expected behaviours.

Objective 5:

Transform our customer service model to reduce demand.

Objective 6:

Improve first contact resolution.

How we will make sure we achieve the strategy

Development and implementation of an action plan to deliver this strategy's outcomes will be regularly reported on and monitored by the Transformation Board, CMT and the Mayor's office

Delivery of our detailed action plan will help us deliver the outcomes of the Customer Experience Strategy. We have also developed operational measures of success to monitor the success of the work that will be undertaken as we move forward on the journey to deliver our customer experience strategy.

Measures of success

It is important we measure what is important to our customers and how we are performing against the plan, this will include:

- % of customer requests that are fulfilled within the agreed timescale
- % resolved at first point of contact
- % of customers reporting a positive experience at first contact
- % of customer reporting a positive experience after their enquiry/request/case was closed
- % Reduction of complaints
- % of customers who complete their transaction digitally
- % of avoidable / failure demand (demand resulting from a problem or mistake made by the council contact)
- % customers who say the website and online forms are easy to use
- Reduction in number of incidents raised regarding customer behaviour.
- Appropriate measures to monitor the implementation of the customer promise and customer standards.
- Customer satisfaction rating improvement.

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London Borough of Tower Hamlets Customer Experience Strategy Survey Results Report – Business (July 2023)



Introduction

Tower Hamlets Council are pleased to introduce the Tower Hamlets Customer Experience Strategy 2023- 2026 – the Council’s first ever customer experience strategy. Excellent customer service is important because it is the interface that connects the Council with its residents.

The Customer Experience Strategy sets the Council’s commitment to improve and enhance the experiences residents have when accessing services.

The strategy sets out the vision to deliver against this commitment and will connect the council with residents, facilitating their easy access to our services and helping them secure a better future. The Council will also work collaboratively with partners, local communities, and individuals to help deliver and shape a positive customer experience.



Methodology

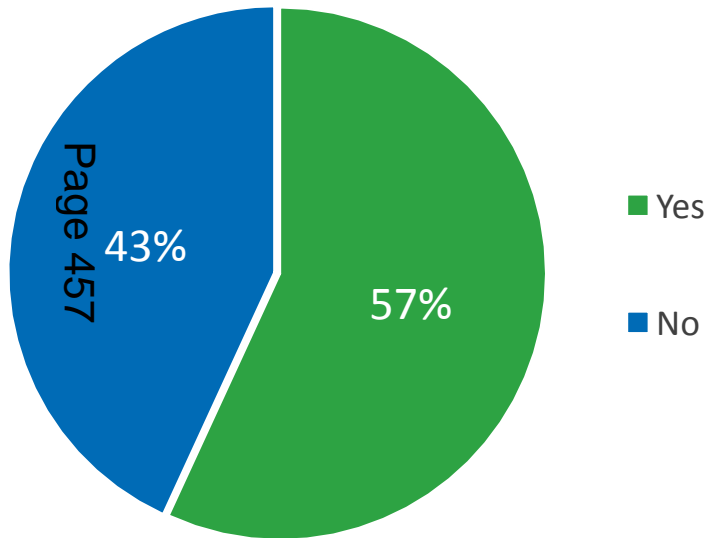
- Tower Hamlets Council wish to understand the views of residents and businesses on their Customer Experience Strategy 2023-26
- The Council commissioned Social and Market Research (SMSR Ltd), an independent research agency, to conduct surveys with residents and businesses using Computer Aided Telephone Interviewing (CATI) and on-street using Computer Aided Personal Interviewing (CAPI)
- A questionnaire was designed by key staff at The Council with support from SMSR Ltd during a thorough development phase with input and feedback provided by staff at both organisations in order to validate the script
- The consultation took place between 12th June and 7th July 2023
- A sample of 1,108 residents were interviewed, representative by age, gender, ethnicity and ward. This provides a confidence level of 95% (+/-3%)
- A further 50 interviews were completed with a cross section of businesses across the borough
- This report provides headline findings for the 50 business surveys including key insight

Summary

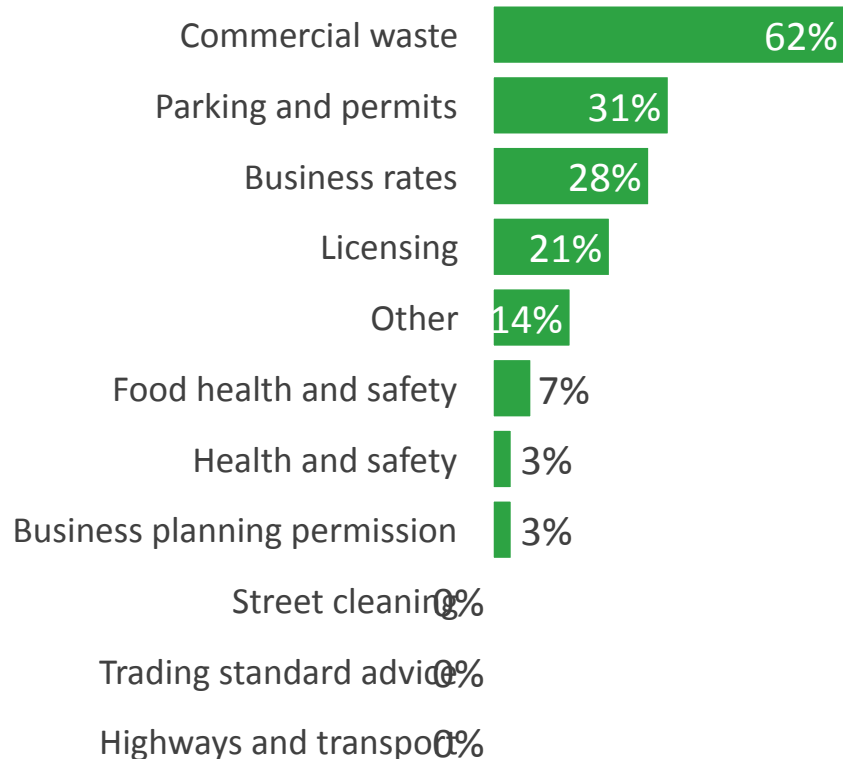
- More than half of businesses interviewed contacted Tower Hamlets Council in the past year; the most frequent services contacted were Commercial Waste (62%), Parking and Permits (31%) and Business Waste (28%)
- More than half agreed staff were helpful and polite (55%), and felt they got to speak to the right person, first time (55%). Two fifths disagreed that accessing the service was easy (38%) and that timescales were met (38%)
- When asked to rank three methods of preferred contact with the Council, the top three choices were telephone (90%), email (55%) and in person (55%). When only considering the top ranked method, contact via telephone was most popular (34%) compared to website (28%) and in person (24%)
- Of those businesses who did not choose the Council website as a preferred method of contact, the majority (59%) say they prefer not to use online services
- Almost all businesses agree with the Customer Experience Strategy's vision (94%)
- Businesses also completely agree with the Strategy's three desired outcomes, each receiving an agreement score of 100%. However, around a quarter agree these outcomes are currently being met
- Almost all businesses agree that the Customer Promise is clear about what customers can expect from the Council and what the Council can expect from its customers?

Commercial Waste service contacted most frequently

Have you contacted the council in the last 12 months?



If you contacted the council in the last 12 months, please tell us which services you contacted most recently



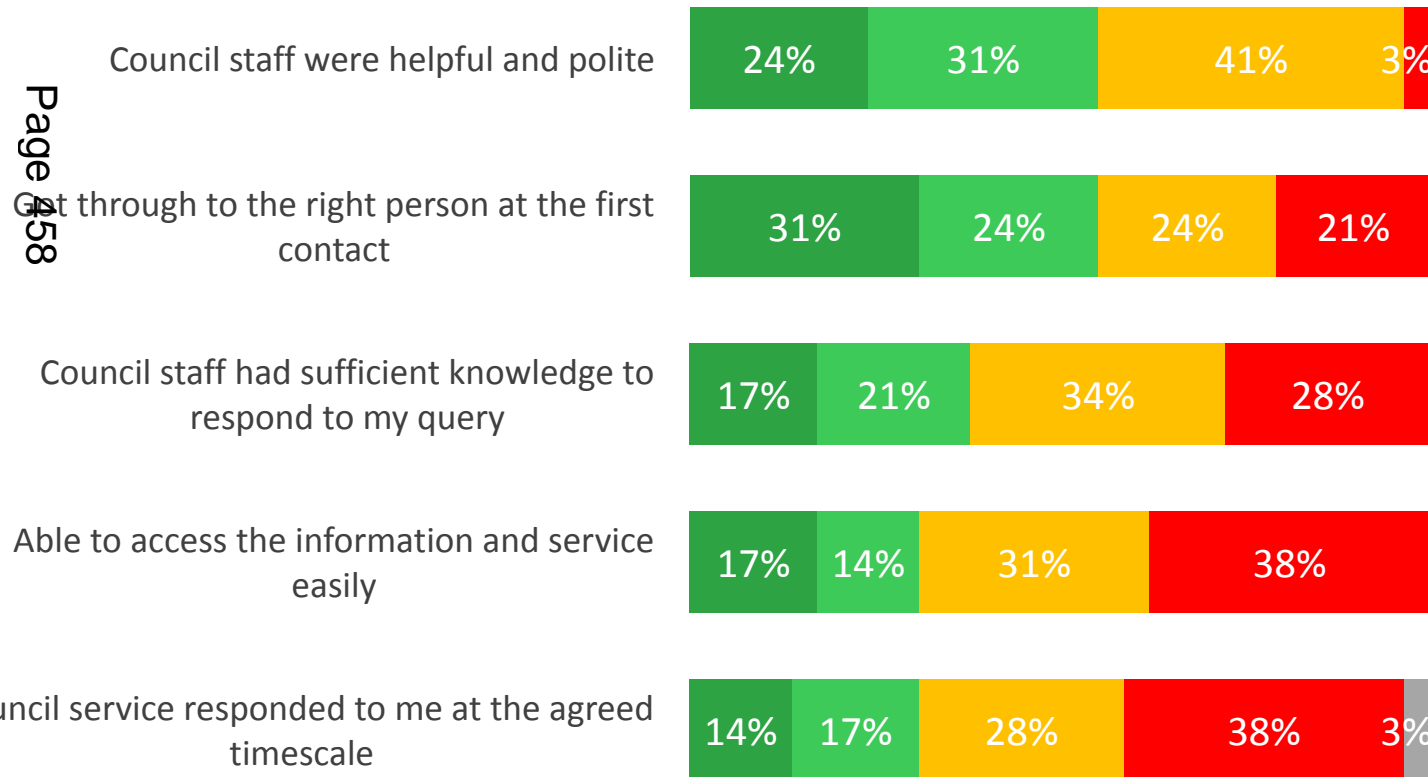
Key Insights

- Just over half of businesses interviewed said they have contacted the council in the last 12 months
- The most prominent reason for contact was commercial waste
- Contact also involved parking and permits, business rates and licencing
- Other reasons for contact included reporting of ASB, repairs and inspections

Over half found staff helpful and polite and said they got through to the right person at the first contact

Thinking about your most recent experience with the council, please state to what extent you agree with the statements below:

■ Strongly agree
 ■ Agree
 ■ Neither agree nor disagree
 ■ Net disagree
 ■ Don't know

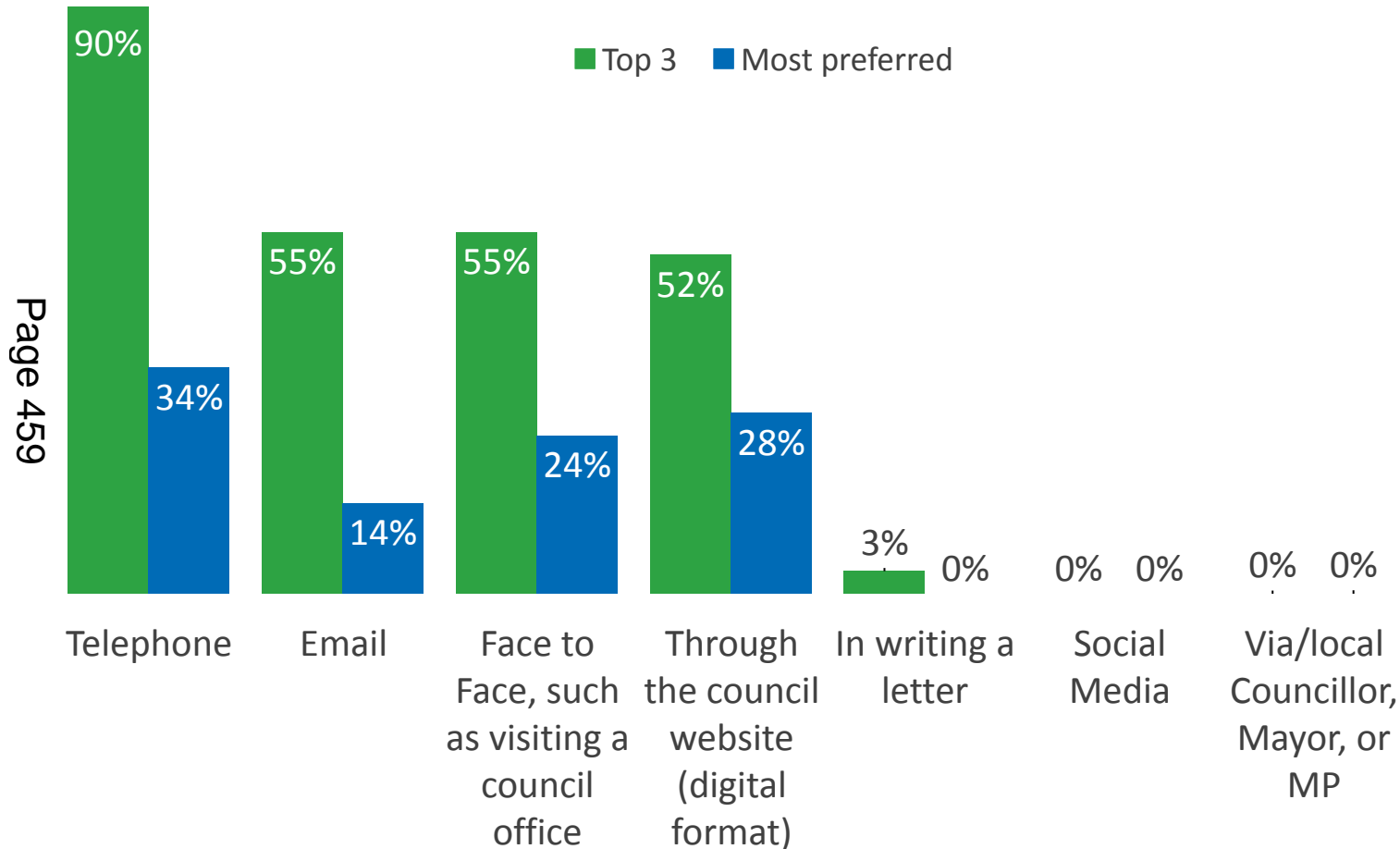


Key Insights

- More than half found Council staff to be helpful and polite (55%) and said they got through to the right person at the first contact (55%)
- Two-fifths felt the staff had sufficient knowledge to respond to their query (38%) with just under a third that felt they were able to access the information and service easily (31%) and that the service responded to them in the agreed timescale (31%)
- Around two-fifths disagreed they were able to access the information and service easily (38%) and that the service responded to them in the agreed timescale (38%)
- Significant levels of neutral response to statements may indicate some modes of contact may not be applicable to the statements

Contact via telephone most preferred method

How would you prefer to contact the council? (RANK TOP THREE)



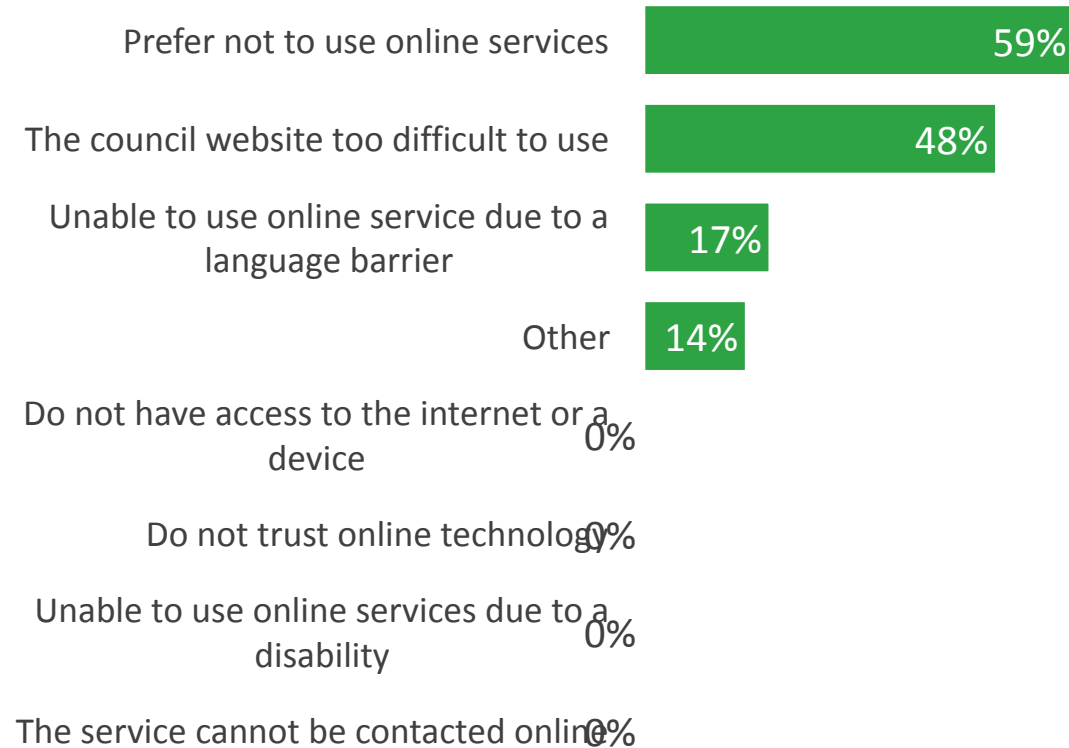
Key Insights

- Overall, when given three choices, almost all businesses chose telephone contact as a preferred method. More than half chose email (55%), face to face (55%) or through the council website (52%)
- When considering preferred choices (no 1 ranked method), telephone retained the highest percentage (34%), followed by the website (28%) and face to face contact (24%)
- Fewer said they prefer email (14%)

Those who do not choose to use the website prefer not to use online services

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If you would not choose to contact the council using our website/ online service, please tell us why?

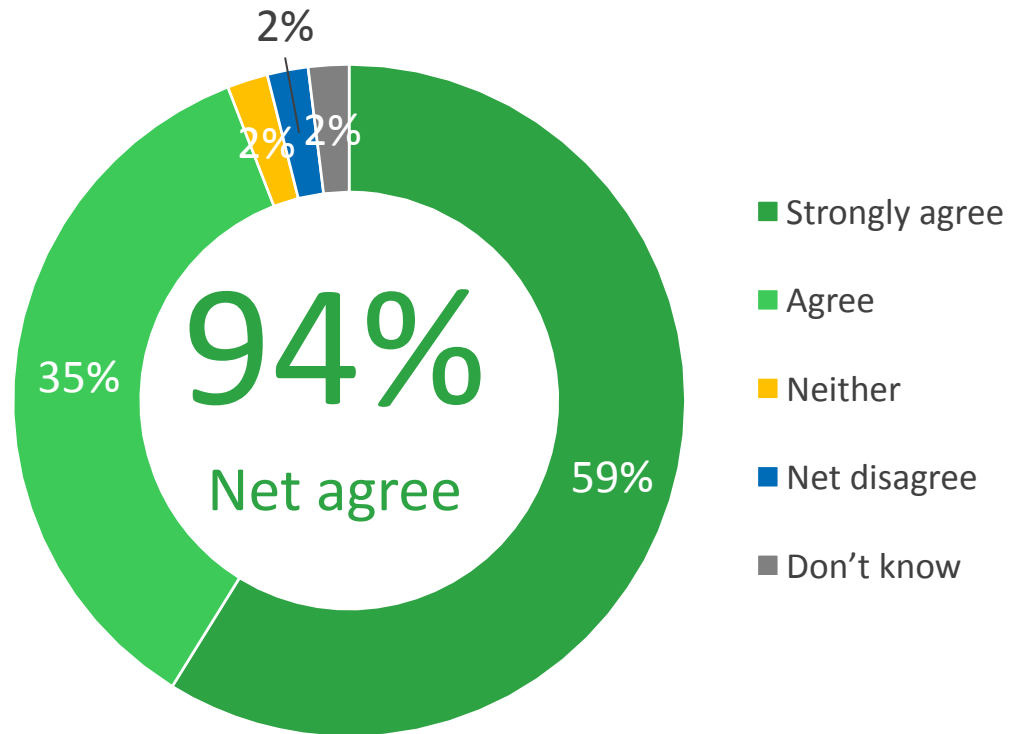


Key Insights

- The majority of those businesses who did not choose the website as a method of contact say they prefer not to use online services (59%). Anecdotally, some businesses stressed the speed of response was slower using online modes or there was uncertainty regarding timescales
- Around half also cited difficulty of use as a factor when not selecting to use the website (48%)
- Other reasons included language barriers (17%) and those who provided an 'other' option cited timescales and the urgency of some enquiries.

Almost all businesses agree with the Customer Experience Strategy's vision

Please state to what extent you agree with the Customer Experience Strategy's vision?



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Key Insights

- Businesses showed overwhelming support for the Customer Experience Strategy's vision.
- The majority of businesses interviewed (59%) say they strongly agree with the vision
- A third say they agree (35%) and a small percentage gave a neutral response (2%), disagreed with the vision (2%) or did not know (2%)

Complete agreement towards each of the Strategy's desired outcomes

Please state to what extent you agree with the Strategy's desired outcomes?

■ Strongly agree ■ Agree ■ Neither agree nor disagree ■ Net disagree ■ Don't know

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The council embed a customer-focused culture to deliver an excellent customer experience



Council services are easily accessible, and inclusive



Services are improved by using feedback, data, technology, and innovation



Key Insights

- It was found that businesses were also unanimous in agreement towards each of the Strategy's desired outcomes
- In keeping with the same percentage of business that strongly agreed with the Strategy's vision, three-fifths (59%) say they strongly agree with each of the Strategy's outcomes
- The remaining business say they agree with the strategy
- No businesses said they disagreed with the desired outcomes

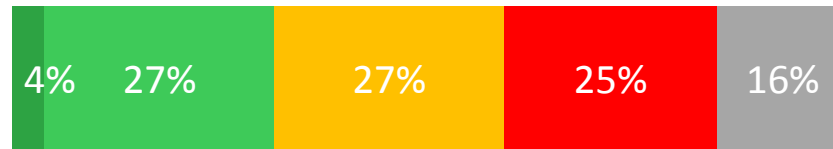
Just under a third feel council services are easily accessible and inclusive

To what extent do you think Tower Hamlets Council currently meet these outcomes?

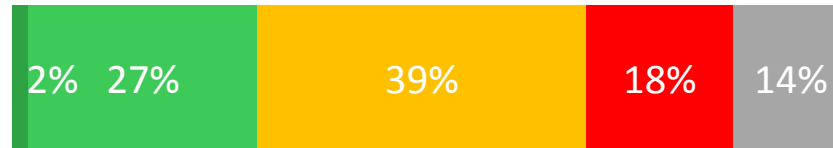
■ Strongly agree
 ■ Agree
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 ■ Net disagree
 ■ Don't know

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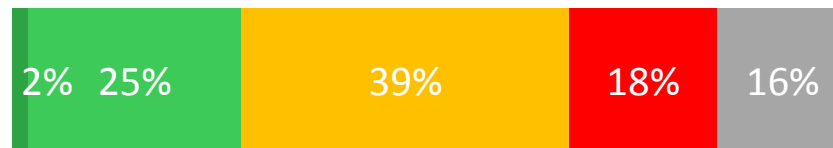
Council services are easily accessible, and inclusive



Services are improved by using feedback, data, technology, and innovation



The council embed a customer-focused culture to deliver an excellent customer experience



Key Insights

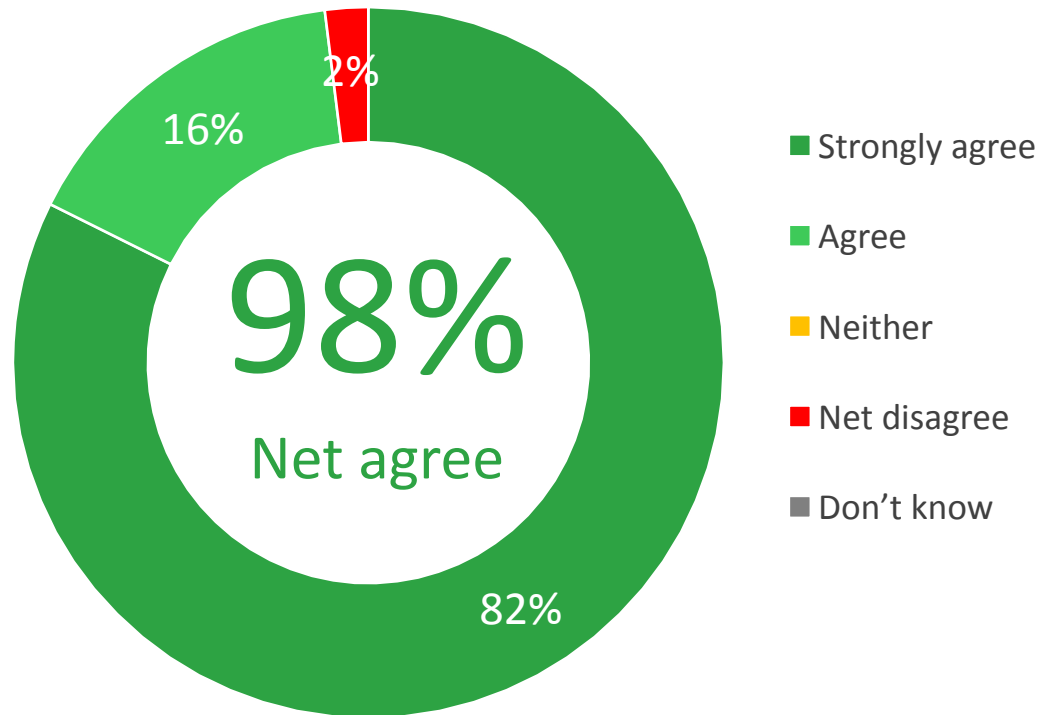
- 31% felt council services are easily accessible and inclusive, with slightly fewer that feel that services are improved using feedback, data, technology and innovation (29%) and the council embed a customer-focused culture to deliver an excellent customer experience (27%)
- Significant levels of neutral response to statements which may indicate a mixed experience
- Highest levels of disagreement towards accessibility (25%)

Are any additional outcomes which should be included - themes

- Insufficient Waste Infrastructure: Businesses mention not having enough bins and the need for bigger bins in the area to address a growing waste issue.
- Inadequate Support for Businesses : Some businesses feel that council staff need better training and hold a perception that no one listens to their concerns in the council. Businesses also express dissatisfaction with the lack of support from the council in resolving issues like parking, fines, and license delays.
- Timescales: Obtaining licenses and accessing council services is described as a time-consuming and cumbersome process, causing frustration for some business owners.
- Communication and Accessibility: There is a lack of clear and easy access to council services. Businesses mention difficulties in reporting problems and not knowing how to contact the council.
- Security and Crime: Businesses have expressed concerns about high crime rates, inadequate security measures, and dysfunctional security cameras in the area.

The vast majority feel the Customer Promise is clear about what customers can expect

To what extent do you agree that the Customer Promise is clear about what our customers can expect from us and what we expect from our customers?



Key Insights

- As found with residents, most businesses interviewed agree, overall, the Customer promise is clear (98%)
- Four-fifths say they strongly agree the Customer Promise is clear (82%)
- A small percentage say they disagree this is the case

Summary of other comments

Additional comments were limited amongst business respondents; below is a series of quotes from the verbatim provided:

“We are having another big problem regarding parking for the shoppers because the council put the double yellow lines everywhere, which has affected the business in the area. Most properties upstairs are empty due to TFL underground services, could be occupied by homeless as they are just sitting outside and get drunk. When we say something, they can be very rude. We need the council to pay attention on these problems.”

“Parking is a big issue for the businesses, we are only allowed to park for 15 minutes and even for that time it is impossible to park because some people park their vans for the whole day - no one says anything to them. We park our delivery vans far away from the shop, it gets so difficult to bring deliveries.”

“There is a scaffolding up outside the shops for months, TFL has put this up and is not removing it. Had reported it several times but nobody is listening. Due to that, customers are not happy, especially in rainy weather. There should be a system to solve these types of issues.”

“Staff are very helpful. The main problem is drugs and drug dealing; I have witnessed it several times. Havent reported it to the police or council because we are scared.”

“Staff are very helpful and kind. We need bigger bins in the area, local residents just leave junk on the side streets.”

“We need a physical presence of staff to see the problems so that they can resolve the issues.”



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SMSR
RESEARCH



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Appendix 3

Equality Impact Analysis Template

Section 1: Introduction

Name of proposal
For the purpose of this document, 'proposal' refers to a policy, function, strategy or project Customer Experience Strategy
Service area and Directorate responsible
Resources
Name of completing officer
Tope Alegbeleye
Approved by (Corporate Director / Divisional Director/ Head of Service)
Yes
Date of approval
Click or tap to enter a date.

Where a proposal is being taken to a committee, please append the completed EIA(s) to the cover report.

Conclusion – To be completed at the end of the Equality Impact Analysis process.

This summary will provide an update on the findings of the EIA and what the outcome is. *For example, based on the findings of the EIA, the proposal was rejected as the negative impact on a particular group was disproportionate and the appropriate actions cannot be undertaken to mitigate risk. Or, based on the EIA, the proposal was amended, and alternative steps taken.*

The focus of this is to analyse the impacts of the proposal on residents, service users and the wider community that are likely to be affected by the proposal. If the proposed change also has an impact on staff, the committee covering report should provide an overview of the likely equality impact for staff, residents and service users and the range of mitigating measures proposed.

Conclusion	Current decision rating (See Appendix A)
<p>The Customer Experience Strategy will have an impact on all residents, visitors, students, business in the borough. The aspiration to provide all customers with a positive customer experience, regardless of the channel chosen to communicate with the council will positively impact the borough’s customers. The stated outcomes listed below is designed to improve the customer journey, improve accessibility, and create a more flexible approach for customers engaging with the council.</p> <p>An extensive review of available data has been conducted, to understand the impact on customers. We have used the data to mitigate against any negative impact on any particularly protected characteristic group.</p>	

The Equality Act 2010 places a ‘General Duty’ on all public bodies to have ‘due regard’ to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act.
- Advance equality of opportunity between those with ‘protected characteristics’ and those without them
- Foster good relations between those with ‘protected characteristics’ and those without them

This Equality Impact Analysis provides evidence for meeting the Council’s commitment to equality and the responsibilities outlined above. For more information about the Council’s commitment to equality, please visit the Council’s [website](#).

Section 2: General information about the proposal

Describe the proposal including the relevance of proposal to the general equality duties and protected characteristics under the Equality Act 2010

The Customer Experience Strategy sets out the council's approach to ensuring that our customers receive an excellent customer experience.

The aim of the strategy is to deliver an excellent customer experience that meets the needs of our customer, providing an accessible and high-quality service irrespective of the method chosen to interact with the council. Allowing Customers to be more self-reliant, by improving the digital platform, while providing face to face channels, for those residents who chose to utilize this channel.

The strategy outlines the outcomes that it aims to deliver.

Outcome 1: Council services are easily accessible, and inclusive.

Outcome 2: Utilise feedback, data, technology and innovation to improve services.

Outcome 3: Embed a customer-focused culture to deliver an excellent customer experience.

Tower Hamlets has a diverse population with over 300,000 people living in the borough. The council offers a wide range of services, and it is envisaged that anyone who lives, works, visits, or has a business in the borough will need to interact with the council at some point.

Why do we need a strategy?

It has been identified that the council needs to improve customer service. The 2021 Mid Pandemic Resident Survey provides a snapshot of the resident's attitude towards the council.

66% of respondents agreed with the statement "My council is doing a good job".

When reviewing how respondents answered this question by ethnicity

- 72% of people from White backgrounds agree that the council is doing a good job compared to 61% of respondents from BAME backgrounds.
- 37% of Bangladeshi respondents disagreed with the statement compared to just 27% of white respondents.

Residents within the age bracket 35–59-year-old are more likely to agree with the statement that "my council is doing a good job".

When asked their views on the statement "My council does not do enough for me", 51% of participants agreed with this statement. When reviewing the feedback by

age, younger people were more likely to agree with the statement, compared to older aged groups.

There were also some differences when comparing feedback based on ethnicity; 46% of people from White backgrounds agree with the statement compared to 56% of BAME respondents and 58% of Bangladeshi respondents.

In addition, the main channel used by residents to contact the council is the telephone. The 2019 Annual Resident Survey results show that 75% of respondents used the telephone to contact the council, followed by e-mail at 24%. Results from the 2020 Residents Mid pandemic survey showed that 59% of participants found it difficult to get through to the council by phone. People from BAME groups find it more difficult to contact the council by phone. Feedback from the External Customer survey in 2022 showed that some of the respondents experienced long waits for the telephone to be answered (50% of the respondents 8 min+ and emails 60%, 5 days+).

In the digital age customers expect to be able to access more services on-line, having the flexibility to access services at a time that suits them. 95% of council residents have access to the internet. When looking at the equality breakdown results from the Pandemic resident survey, 97% of people from BAME backgrounds have access to the internet at home compared to 90% of White respondents.

Unsurprisingly perhaps, 91% of people aged 18-34 use smartphones compared to 48% of over 60s. 90% of Bangladeshi respondents reported that they use smartphones compared to 77% of White respondents. Compared to other age groups, older people are less likely to use online services like banking, shopping and other transactional activities.

To support the strategies development, engagement with staff, senior management and external customers has been conducted extensively. In particular, a draft strategy was consulted by residents, businesses and the council staff.

Customer Experience Strategy Steering Group

A steering group consisting of managers and officers from a wide range of services across the council directorates, has been established. The role of the group is to comment and oversee the development of the strategy.

National Customer Service Week - Customer Service POD Session

During the National Customer Service week, two Customer Service Pod sessions were held in October. Over seventy staff members attended the events across the

two sessions. The participants provided feedback on key aspects of the strategy's content, including the vision, objectives and customer promise.

Customer Service – Council Staff Survey (by the institute of Customer Service)

In October 2022, over 330 council staff from a wide range of council services responded to the internal staff survey. The survey was designed to assess staff's view on how the council strategy, organisation, culture, and processes enable them to deliver excellent customer service.

November – December 2022- Customer Service- External Service Users Survey

The external service users survey received only 30 responses, although more people viewed the actual survey, but chose not to respond. The key messages were as follows.

- Top three most contacted services: Parking, Council tax and Waste service
- Some experienced long waiting for phone calls (50% of the respondents, 8 min+) and emails (60%, 5 days+) to be answered.

Public Engagement

The draft Strategy was consulted by residents, businesses and the council staff in the period between 5 June and 7 July 2023.

To ensure that a cross section of the community was able to engage in the consultation the following engagement methods has been used.

- Resident survey (face to face and telephone, commissioned): 1,100 resident samples. The samples largely correspond with the demographic make-up of the borough as identified by the 2021 census.
- Business survey (face to face and telephone, commissioned): 50 business samples.
- Let's talk Tower Hamlets online survey: for residents and businesses: 18 people responded.
- Council staff survey (online, 21 June-7 July): 145 responded.

Equalities data of the Resident survey participants were collected.

Resident surveyed by age	%
16-24	16
25-34	28
35-44	23
45-54	16
55-64	11
65+	7

Residents' ethnicity	%
White	50
Asian	37
Black	8
Mixed	3
Other	1

The draft Customer Experience Strategy was overwhelmingly supported by the respondents.

Strategy's Vision

94% of respondents agreed with the strategy's vision.

Strategy's Outcomes

95% of respondents agreed with the strategy's three outcomes.

- Agreement levels tended to be higher amongst those aged 16-24, 25-34, 75+, males and White respondents.
- Agreement levels tended to be lower amongst those aged 45-54, 55-64, 65-74, females, those with a disability or from an ethnic minority background.

Preferred method in contacting the council.

87% of respondents stated that their preferred method of contacting the council is by telephone.

- Overall, older residents, those with a disability and ethnic minority groups more inclined prefer telephone contact.

Of those who preferred not to contact the council online

- Older residents and those with a disability were more likely to say they do not have access to the internet.
- Those from an ethnic minority background and aged between 25 and 44 were more likely to say they prefer not to use online services.

Most contacted council services.

Of those respondents who had contacted council services, housing benefits, council tax and waste were the most contacted services.

- Residents from an Ethnic Minority Background more likely to have contacted the council regarding both Housing and Council Tax or Housing Benefit compared to White respondents.

Section 3: Evidence (consideration of data and information)

What evidence do we have which may help us think about the impacts or likely impacts on residents, service users and wider community?

The Strategy used a wide range of service, local and national data and information, to help inform the strategy. The Customer Experience Evidence base details the key pieces of evidence, this includes.

Borough Profile

Borough Profile Data from the 2021 census- The borough profile brings together the key facts and figures about the borough population.

London Borough of Tower Hamlets Annual Resident Survey- the resident survey provides a snapshot of the views of the respondents on a wide range of issue including satisfaction on council services, access to internet, method used to contact the council.

Service Monitoring data and Customer Satisfaction Results

Children and family centre feedback

Idea store and Libraries Customer Survey results

Parking and mobility annual monitoring results

Information Governance Complaints and Members Enquiry Data

Personal Social Services Adult Social Care Survey 2021-2022

Data on access and usage of Council Services

Data on visits to the council websites, access to online forms and social media request

- The council website had over 1million visits in July-Sept 2022.
- The number of people who registered to use online forms steadily increased every quarter from January till September 2022. 95% of bulky waste requests were made online in July-Sept 2022.
- The council received over 9,000 social media requests at every quarter between January and September 2022.

Access to Services

In person visit to the Resident Hub

Between March and December 2022 6777 people visited the resident Hub (equality data not collected)

Strategies and Policies

The Customer Experience Strategy has been designed to align with other Council strategies and policies.

Digital Inclusion Strategy 2021-2024

Persistent and vexation Service Users Policy 2016

London Borough of Tower Hamlets Strategic Plan 2022 - 2026

London Data

London cost of living data.

Institute of Customer Service

UK Customer Satisfaction Index, Jan 2023 (data collection 5 Sept-3 Oct 2022)

The Residents survey of the draft strategy also indicates:

65% of the respondents contacted the council in the past 12 months.

- Males more likely than females to have contacted the council.
- Those aged 35-44 and 75+ more likely to have contacted the council, those aged 55-64 and 65-74 less likely.
- Residents with a disability and ethnic minority respondents less inclined to have contacted the council.
- Residents from an Ethnic Minority Background more likely to have contacted the council regarding both Housing and Council Tax or Housing Benefit compared to White respondents.

64% of the respondents feel council services are easily accessible and inclusive.

- Around 94% of the respondents agree that outcomes. However, agreement with each outcome recede by around a third when asked if the council currently meet them.
- Agreement levels tended to be higher amongst those aged 16-24, 25-34, 75+, males and White respondents.
- Agreement levels tended to be lower amongst those aged 45-54, 55-64, 65-74, females, those with a disability or from an ethnic minority background.

Section 4: Assessing the impacts on different groups and service delivery.

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
Protected				
Age (All age groups)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The Customer Experience Strategy, aims to improve the experience that customers receive when, engaging with services. The aspiration of the council is to provide a consistent service regardless of the channel chosen to communicate with the council, improving the digital platform, so that customers can access services at a time that suits them. Data shows that older residents age 65+ are less likely to have access to the internet, the provision of the Resident Hub enables residents to receive face to face support, on key service areas, such as housing, council tax, and welfare benefits.</p> <p>In addition, data showed that 44% of older people live in income deprived houses, therefore this group of people may require more access to council services.</p>

				Increased, collaboration between the council and voluntary organisations that support customers, improving signposting and the aspiration to resolve issues at the first point of contact, will provide positive outcomes for customers.
Disability (Physical, learning difficulties, mental health and medical conditions)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The Customer Experience Strategy, aims to improve the experience that customers receive when, engaging with services. The aspiration of the council is to provide a consistent service regardless of the channel chosen to communicate with the council, improving the digital platform, so that customers can access services at a time that suits them. the provision of the Resident Hub enables vulnerable residents to receive face to face support, on key service areas, such as housing, council tax, and welfare benefits.</p> <p>In addition, the aspiration to provide jointed up service between council departments, increased collaboration with voluntary and external organisations will provide positive outcome to this group.</p> <p>The Residents survey shows respondents with a disability are less inclined to have contacted the council. Making the council service accessible and inclusive may encourage this group to contact the council more.</p>

Sex	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The aspirations of the Customer Experience Strategy should provide a positive outcome for this group.
Gender reassignment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The aspirations of the Customer Experience Strategy should provide a positive outcome for this group.
Marriage and civil partnership	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The aspirations of the Customer Experience Strategy should provide a positive outcome for this group.
Religion or philosophical belief	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The aspirations of the Customer Experience Strategy should provide a positive outcome for this group.
Race	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Feedback from the 2021 Pandemic resident Survey showed that residents from the BAME community experienced more difficulty reaching the council by telephone than other groups. The aspiration of the strategy is to improve the experience that customers receive regardless of the chosen channel of communication. The commitment to embed customer-focused culture to deliver excellent customer experience, should provide a positive outcome for customers.

				<p>Residents with a disability and ethnic minority respondents less inclined to have contacted the council.</p> <p>The Residents survey shows ethnic minority respondents are less inclined to have contacted the council. Making the council service accessible and inclusive may encourage this group to contact the council more.</p>
Sexual orientation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The aspirations of the Customer Experience Strategy should provide a positive outcome for this group.
Pregnancy and maternity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The aspirations of the Customer Experience Strategy should provide a positive outcome for this group
Other				
Socio-economic	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Data shows that low-income families are less likely to have internet at home, the ability to communicate with council through a range of channel, i.e., telephone and face to face, allows flexibility and access to council services for this group.
Parents/Carers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The aspirations of the Customer Experience Strategy should provide a positive outcome for this group

<p>People with different Gender Identities e.g., Gender fluid, non-Binary etc</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The aspirations of the Customer Experience Strategy should provide a positive outcome for this group</p>
<p>Any other groups</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The aspirations of the Customer Experience Strategy should provide a positive outcome for this group.</p>

Section 5: Impact analysis and action plan

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Update on progress

Section 6: Monitoring




What monitoring processes have been put in place to check the delivery of the above action plan and impact on equality groups?

The draft Strategy is due to go to consultation in June, any equality considerations that are highlighted following the engagement process will be reviewed and the equality analysis updated.

The Strategy will be accompanied by an action plan, with the delivery monitored by the new Efficiency Board, ensuring that the stated outcomes and objectives are met.

Appendix A

EIA decision rating

Decision	Action	Risk
<p>As a result of performing the EIA, it is evident that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a Protected Characteristic under the Equality Act and appropriate mitigations cannot be put in place to mitigate against negative impact. It is recommended that this proposal be suspended until further work is undertaken.</p>	<p>Suspend – Further Work Required</p>	<p>Red</p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, there is a genuine determining reason that could legitimise or justify the use of this policy.</p>	<p>Further (specialist) advice should be taken</p>	<p>Red Amber</p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negatively impact (as described above) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, this risk may be removed or reduced by implementing the actions detailed within the <i>Impact analysis and action plan</i> section of this document.</p>	<p>Proceed pending agreement of mitigating action</p>	<p>Amber</p> 

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Introduction

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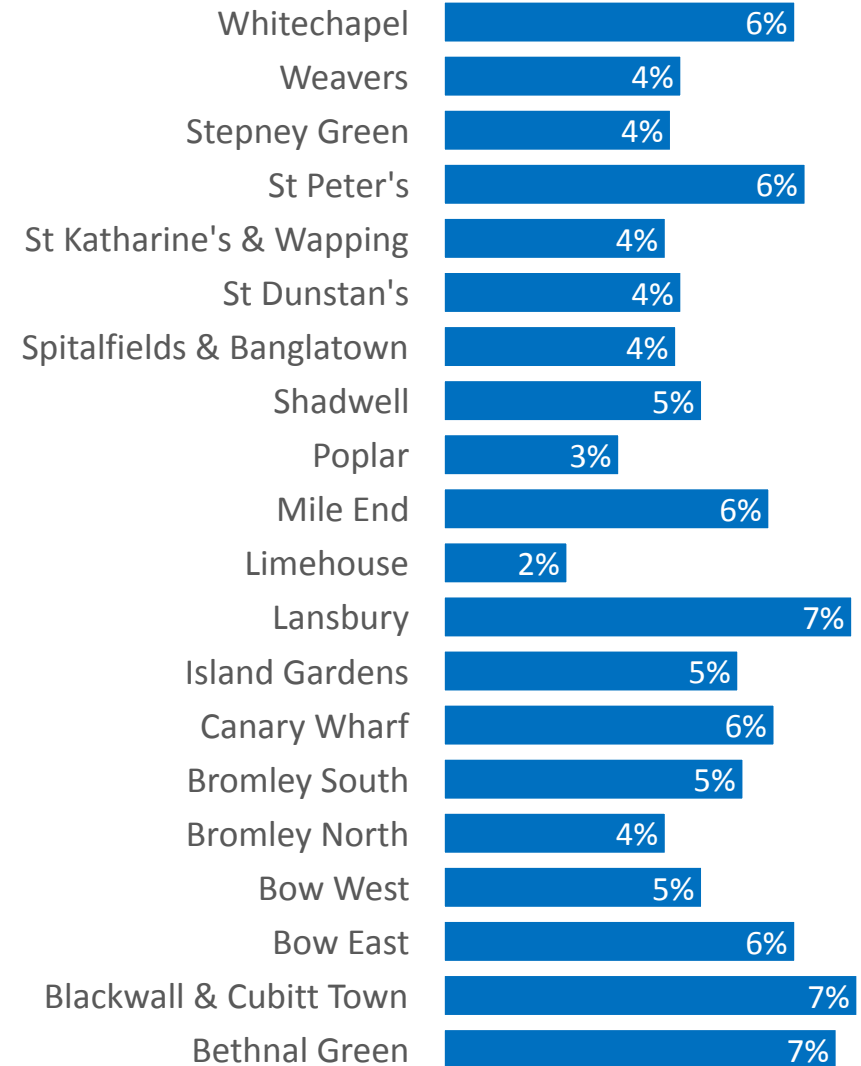
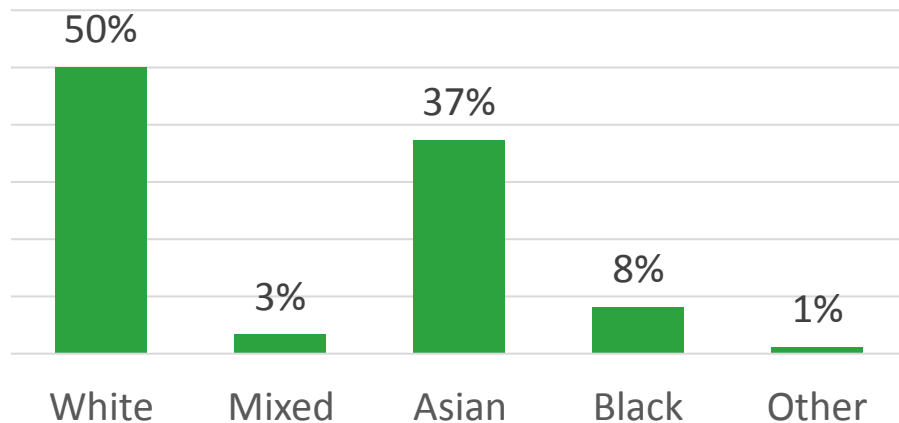
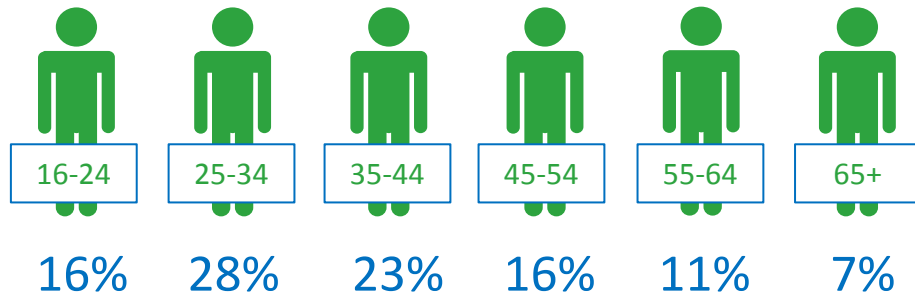
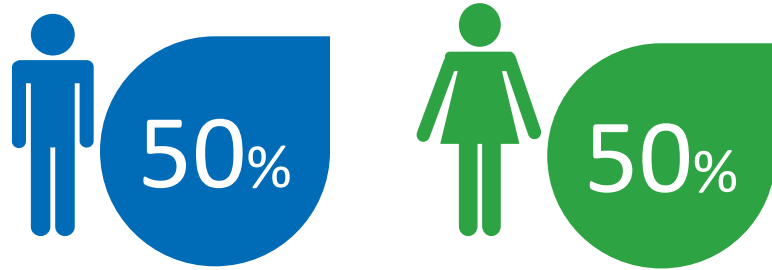
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Summary

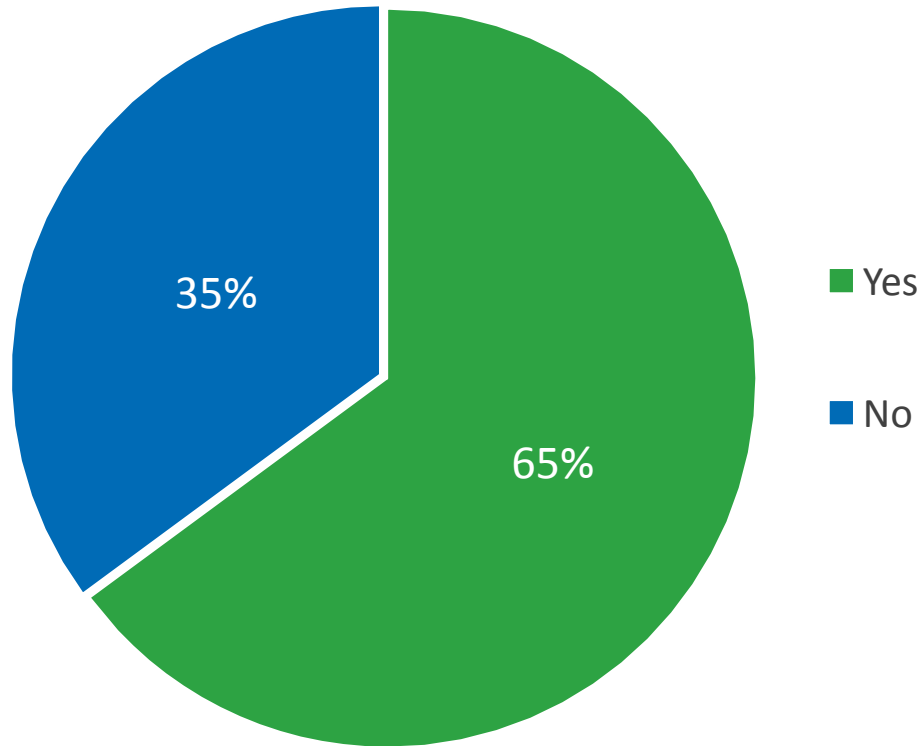
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- Page 488 When asked to rank three methods of preferred contact with the Council, the top three choices were telephone (87%), website (68%) and email (63%). When only considering the top ranked method, contact via the website was most popular (31%) compared to email (29%) and telephone (26%)
- Of those who did not choose the Council website as a preferred method of contact, almost two-thirds (63%) say they prefer not to use online services
- Almost all residents agree with the Customer Experience Strategy's vision (94%)
- Residents also unanimously agree with the Strategy's three desired outcomes, each receiving an agreement score of 95% or over. Around two-thirds agree these outcomes are currently being met
- The vast majority agree that the Customer Promise is clear about what customers can expect from the Council and what the Council can expect from its customers?

Respondent Breakdown (1,108)



Just under two-thirds contacted the council in the past 12 months

Have you contacted the council in the last 12 months?



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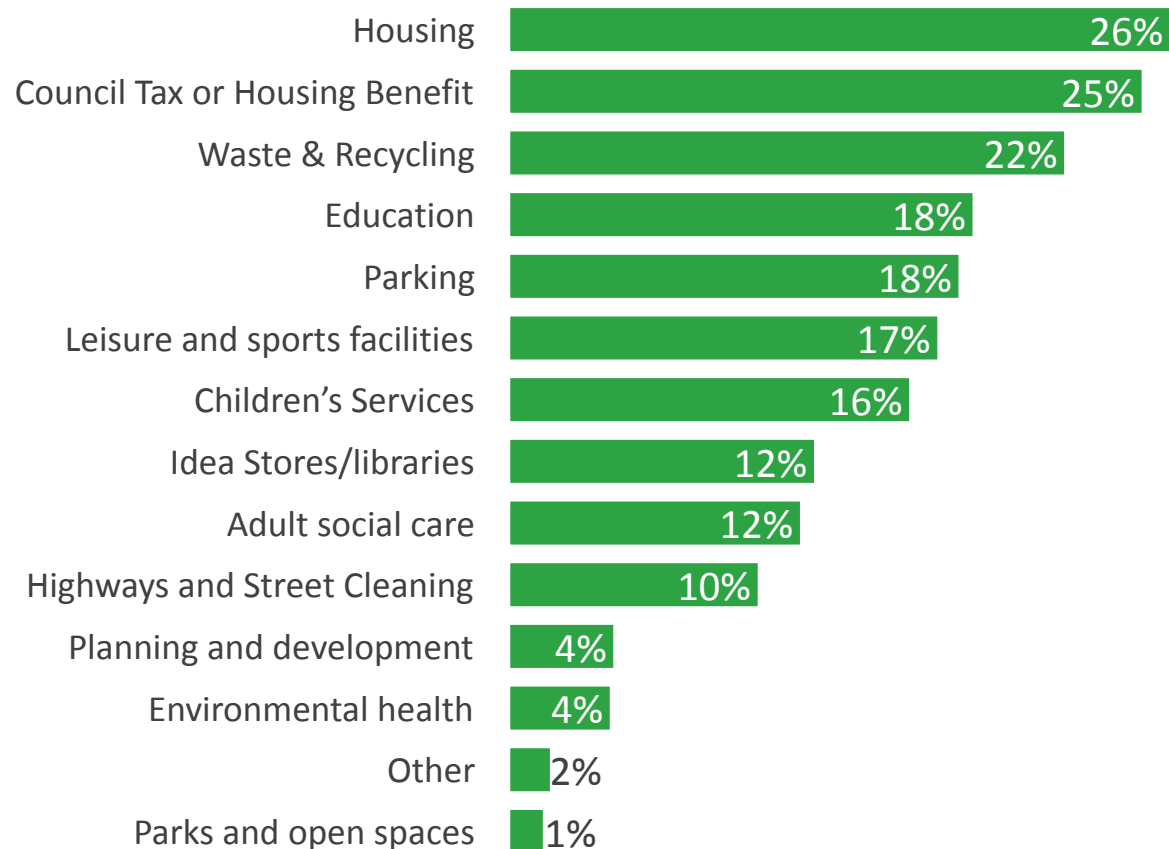


Key Insights

- Just under two-thirds (65%) had contacted the council over the past 12 months
- Males more likely than females to have contacted the council
- Those aged 35-44 and 75+ more likely to have contacted the council, those aged 55-64 and 65-74 less likely
- Residents with a disability and ethnic minority respondents less inclined to have contacted the council
- Residents in Bethnal Green, Bow West, Bromley North, Limehouse, St Katharine's & Wapping and Stepney Green less likely to have contacted the council
- Residents in Blackwall & Cubitt Town, Bow East, Bromley South, St Dunstan's, St Peter's and Weavers most likely to have contacted the council

Most contacted services: Housing; Council Tax or Housing Benefit and Waste and Recycling

If you contacted the council in the last 12 months, please tell us which services you contacted most recently



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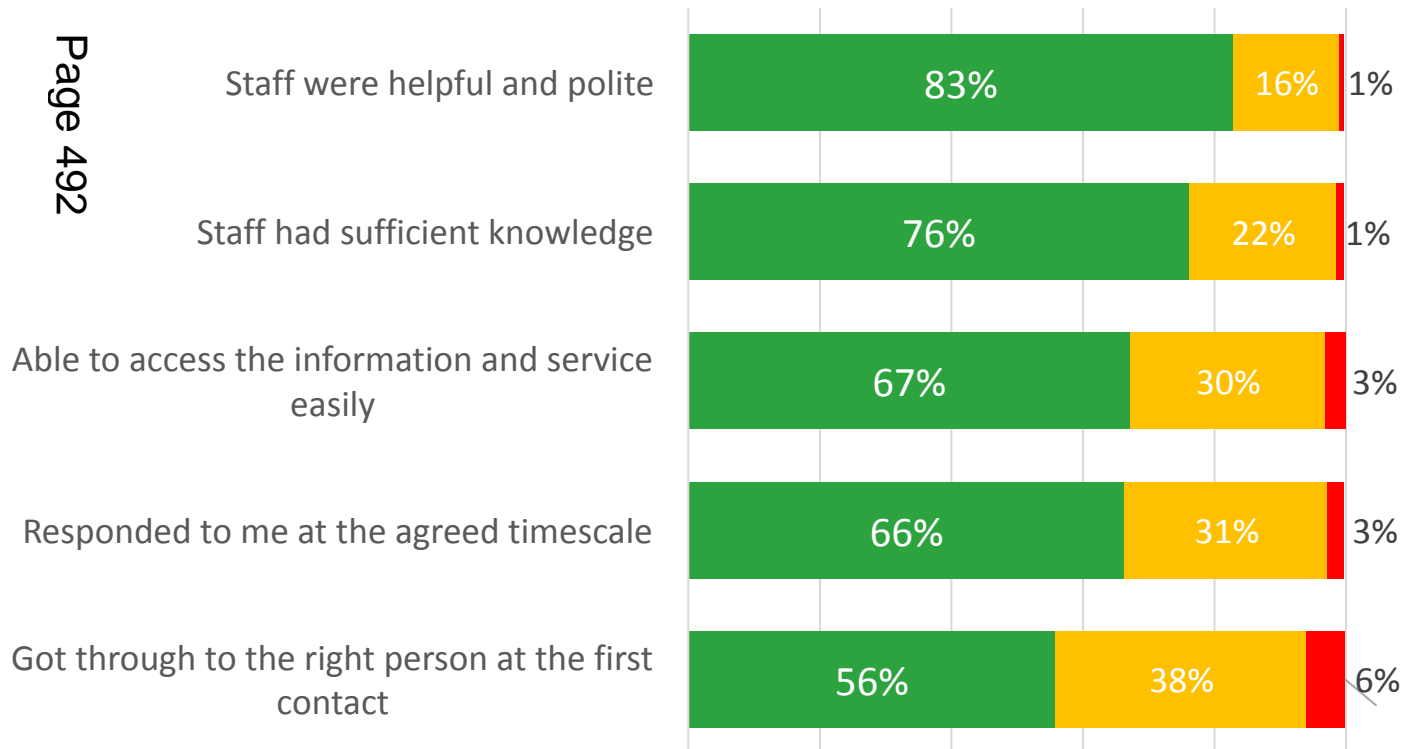
Key Insights

- Around a quarter contacted the council regarding Housing (26%) or Council Tax or Housing Benefit (25%). Just over a fifth made contact regarding Waste & Recycling (22%)
- Just under a fifth contacted the council regarding Education (18%), Parking (18%), Leisure and sports facilities (17%) and Children's Services (16%)
- Residents from an Ethnic Minority Background more likely to have contacted the council regarding both Housing and Council Tax or Housing Benefit compared to White respondents

More than 8 in every 10 found staff helpful and polite; three quarters say staff had sufficient knowledge

Thinking about your most recent experience with the council, please state to what extent you agree with the statements below:

■ Net agree ■ Neither agree nor disagree ■ Net disagree

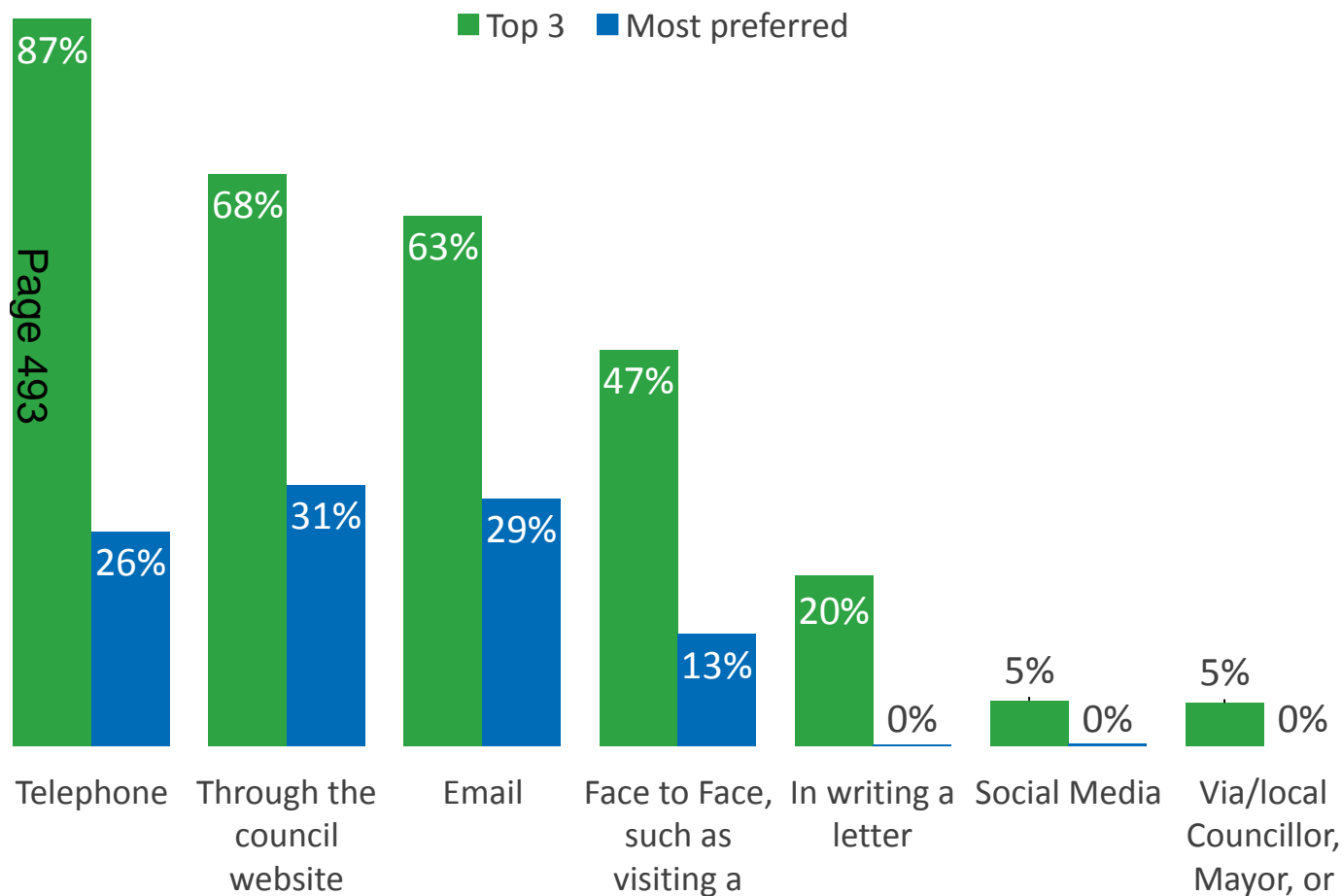


Key Insights

- More than 8 out of every 10 found Council staff to be helpful and polite and three-quarters (76%) felt staff had sufficient knowledge to answer their query
- The majority agreed they were able to access the information and service easily (67%) and felt the council responded in the agreed timeframe (66%)
- Just over half got through to the right person at the first contact (56%)
- Low levels of disagreements to all statements
- Significant levels of neutral response to statements may indicate some modes of contact may not be applicable to the statements

Contact via the council website most preferred method alongside email and telephone

How would you prefer to contact the council? (RANK TOP THREE)

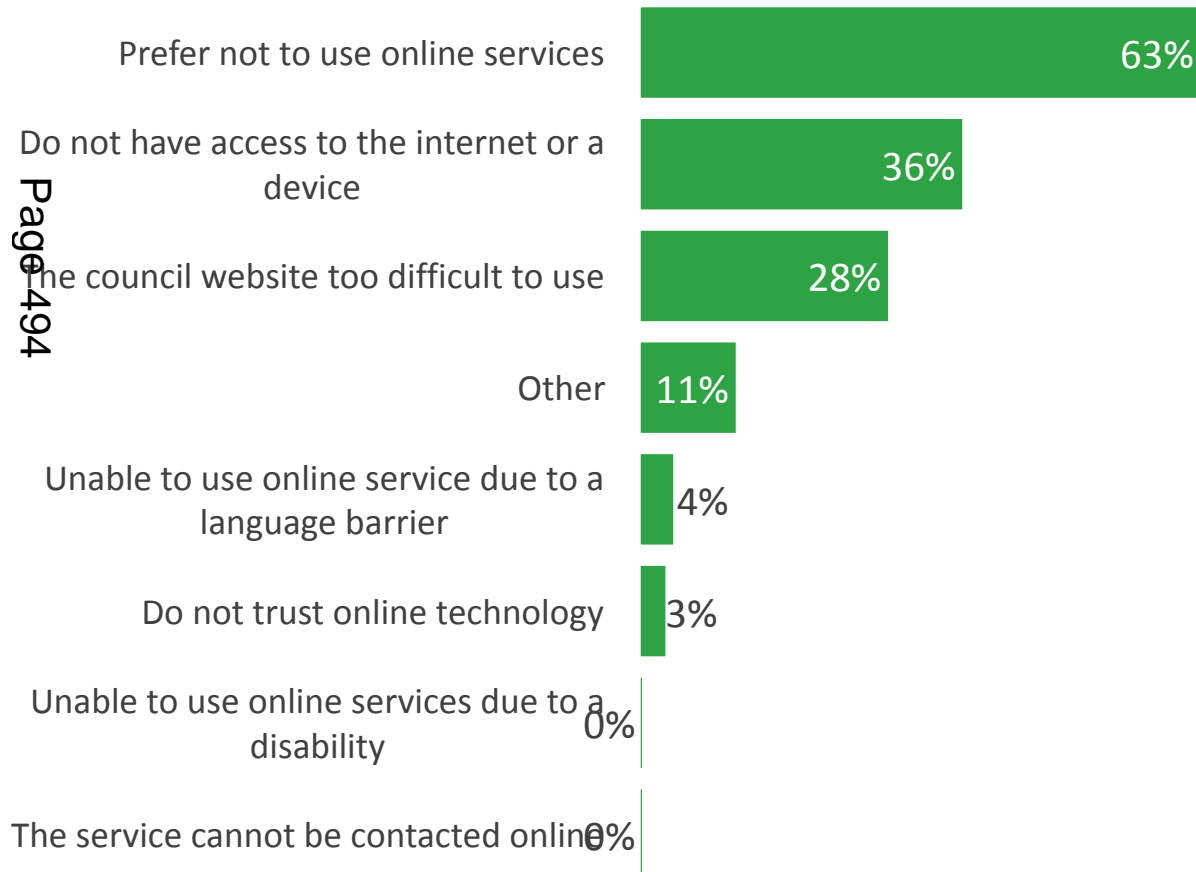


Key Insights

- Overall, when given three choices, almost nine-tenths (87%) chose telephone contact as a preferred method. Around two thirds chose a digital method: council website (68%) and email (63%). Less than half chose face-to-face (47%)
- However, when considering respondents' preferred choices (no 1 ranked method), the majority chose a digital mode of contact: council website (31%) and email (29%). The majority of the remaining respondents chose telephone contact (26%)
- Fewer said they prefer face-to-face contact (13%)
- Overall, older residents, those with a disability and ethnic minority groups more inclined prefer telephone contact

Three quarters of those who would not choose to contact the council via the website prefer not to use online services

If you would not choose to contact the council using our website/
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Page 494

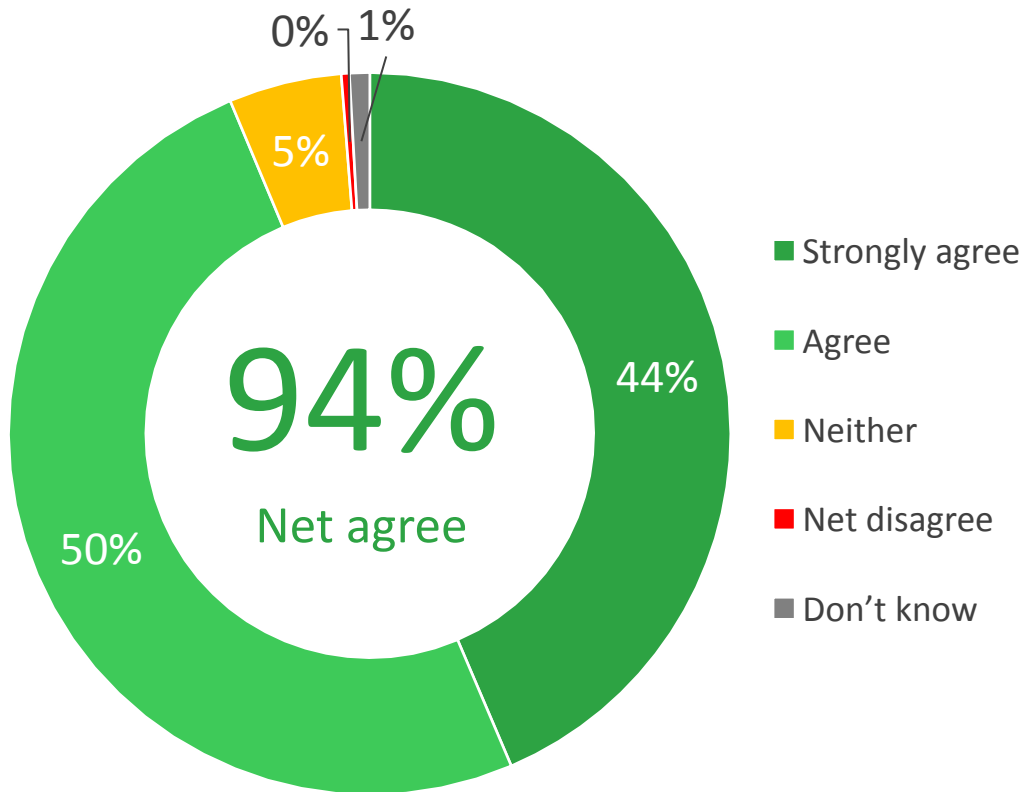


Key Insights

- The most frequent reason residents who did not choose to contact the council via website/online services was Prefer not to use online services (63%)
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- However, Just over a third (36%) said it was due to not having access to the internet and more than a quarter (28%) said the council website was too difficult to use. A tenth (11%) gave another reason, mainly involving a lack of IT skills
- Older residents and those with a disability and were more likely to say they do not have access to the internet
- Those from an ethnic minority background and aged between 25 and 44 were more likely to say they prefer not to use online services

Almost all residents agree with the Customer Experience Strategy's vision

Please state to what extent you agree with the Customer Experience Strategy's vision?



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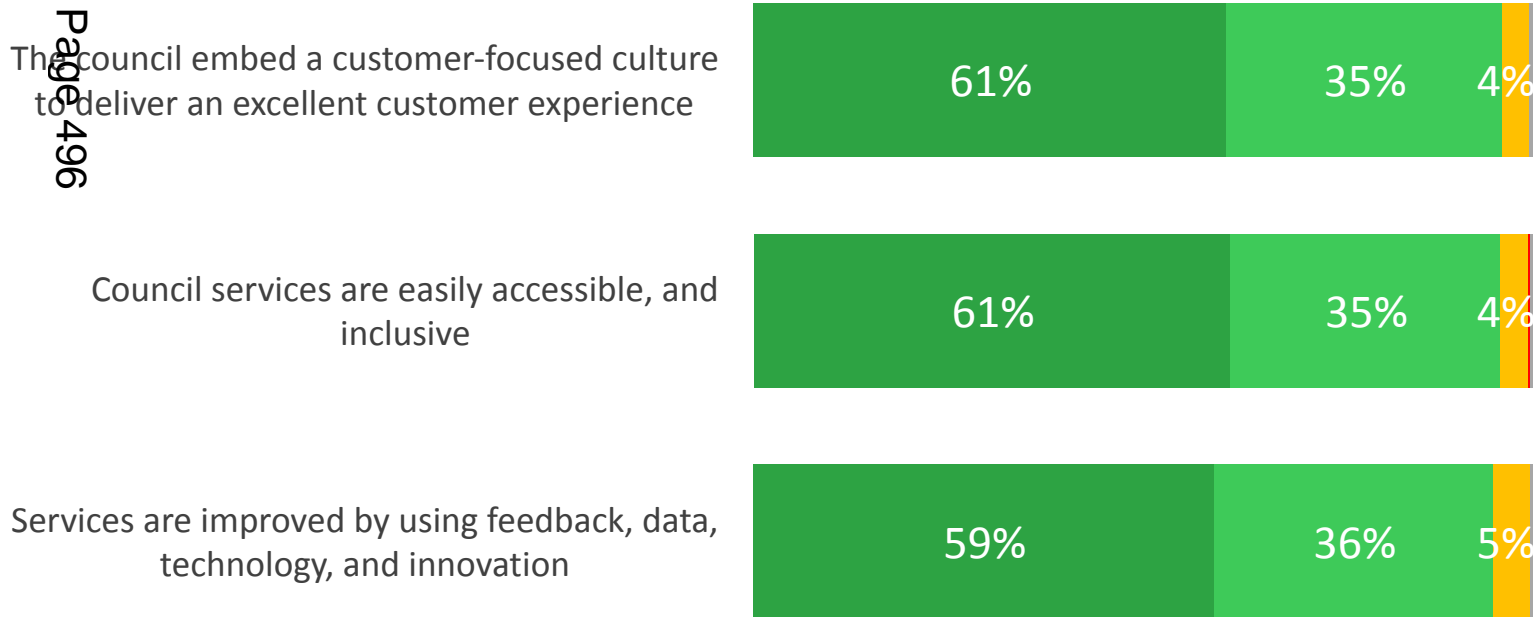
Key Insights

- Almost all residents say they agree overall with the Customer Experience Strategy's vision
- Nearly half (44%) revealed they strongly agreed with the vision
- Less than a percent disagreed with the Customer Experience Strategy's concept
- A small percentage (5%) say they neither agree nor disagree with the vision

High levels of agreement towards each of the Strategy's desired outcomes

Please state to what extent you agree with the Strategy's desired outcomes?

■ Strongly agree ■ Agree ■ Neither agree nor disagree ■ Net disagree ■ Don't know



Key Insights

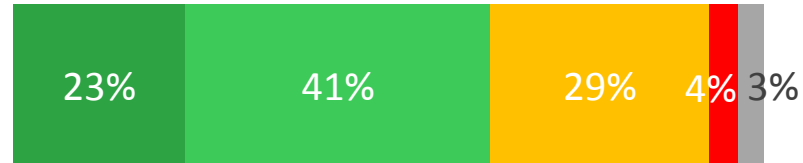
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Just under two-thirds feel council services are easily accessible and inclusive

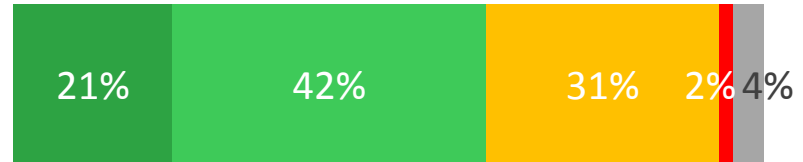
To what extent do you think Tower Hamlets Council currently meet these outcomes?

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 ■ Agree
 ■ Neither agree nor disagree
 ■ Net disagree
 ■ Don't know

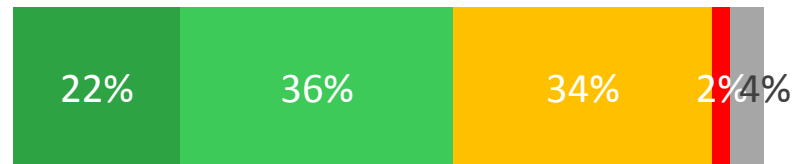
Council services are easily accessible, and inclusive



Services are improved by using feedback, data, technology, and innovation



The council embed a customer-focused culture to deliver an excellent customer experience



Key Insights

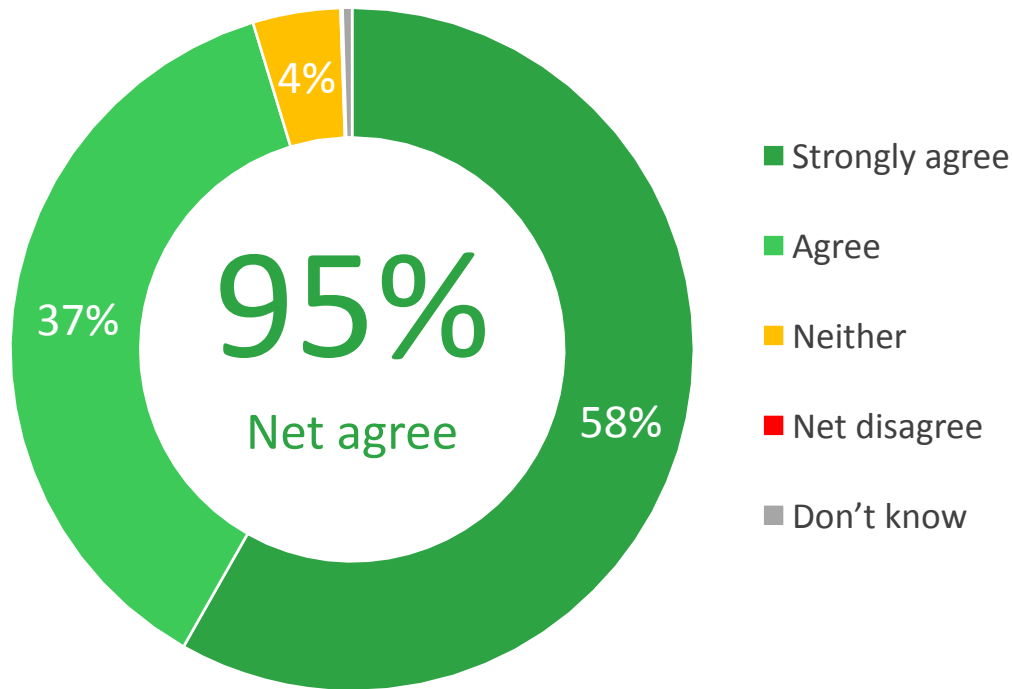
- Agreement with each outcome recedes by around a third when asked if the Council currently meet them. Agreement levels replaces mainly with neutral response of neither agree nor disagree
- Around three-fifths agree the council is currently meeting each outcome
- Disagreement low for all three statements (less than 4%)
- Agreement levels tended to be higher amongst those aged 16-24, 25-34, 75+, males and White respondents
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Are any additional outcomes which should be included (Top 10 themes)

- Enhance Access: Make accessing council services easier, particularly by improving phone-based access and simplifying the navigation of options.
- Increase Local Offices: Establish more local offices to provide in-person assistance and support, ensuring residents can receive help directly and easily.
- Improve Communication: Enhance communication channels, available contact methods, promote online services.
- Strengthen Staff Training: Provide training programs to improve staff knowledge, performance, responsiveness, and professionalism.
- Streamline Processes: Simplify processes, such as school admissions and building regulations, to make them easier and more straightforward for residents.
- Enhance Accountability: Implement measures to monitor and evaluate staff service delivery, ensuring accountability and addressing any issues promptly.
- Collaborate with Other Agencies: Continue collaborating with other agencies and community services to deliver integrated and effective services.
- Improve Feedback Mechanisms: Establish reliable and accessible feedback systems, including alternative options for providing feedback besides online.
- Focus on Specific Needs: Address the needs of specific groups, such as senior citizens, children with special needs, vulnerable individuals, and key workers.
- Enhance Community Engagement: Organise community meetings, consultations, and involvement activities to encourage residents' active participation and ensure their voices are heard.

The vast majority feel the Customer Promise is clear about what customers can expect

To what extent do you agree that the Customer Promise is clear about what our customers can expect from us and what we expect from our customers?



Key Insights

- Residents deemed the Customer Promise to be clear about what they can expect and what the Council can expect from them
- The vast majority say they agree with this statement
- A small percentage provided a neutral response, stating they neither agree nor disagree
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Summary of other comments

Residents were asked to provide any additional comments on the Customer Experience Strategy.

The proposed plans and vision of the council are generally appreciated and welcomed, with residents expressing gratitude for the efforts to improve customer services and the overall quality of life in the borough.

Comments provided about the Council's Customer Experience plan focused on several key themes. Residents expressed a strong desire for the maintenance and improvement in the quality of services provided by the council. They also emphasise the need for high standards and quality staff to best meet their needs. Furthermore, there is a strong emphasis on staff training and knowledge enhancement to ensure professionalism and improve service delivery. Time efficiency is another crucial aspect, with residents calling for realistic time frames and quicker responses.

The use of technology and social media platforms is seen as essential for effective communication, community engagement, and gathering feedback. However, care needs to be taken to ensure that methods of communication are available to suit the needs of more vulnerable groups or those who are not so confident in using online systems. Engaging and involving the community in decision-making processes and establishing regular feedback mechanisms are also highlighted as important factors for a successful customer experience.

Residents also stress the importance of trust and reputation, believing that if the council delivers on its proposed plans, it will gain the trust of the community and be held in high regard.

In summary, the feedback highlights the need for improved service quality, trust-building, the use of technology, a safe environment, community engagement, staff training, time efficiency, and recognition for the council's initiatives. These areas of focus will contribute to a better customer experience and a stronger relationship between the council and its residents.

Q11. Do you have any additional comments?



Page 501

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smsr.co.uk



SMSR
RESEARCH



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London Borough of Tower Hamlets Customer Experience Strategy Survey Results Report (July 2023)



Introduction

Tower Hamlets Council are pleased to introduce the Tower Hamlets Customer Experience Strategy 2023- 2026 – the Council’s first ever customer experience strategy. Excellent customer service is important because it is the interface that connects the Council with its residents.

The Customer Experience Strategy sets the Council’s commitment to improve and enhance the experiences residents have when accessing services.

The strategy sets out the vision to deliver against this commitment and will connect the council with residents, facilitating their easy access to our services and helping them secure a better future. The Council will also work collaboratively with partners, local communities, and individuals to help deliver and shape a positive customer experience.



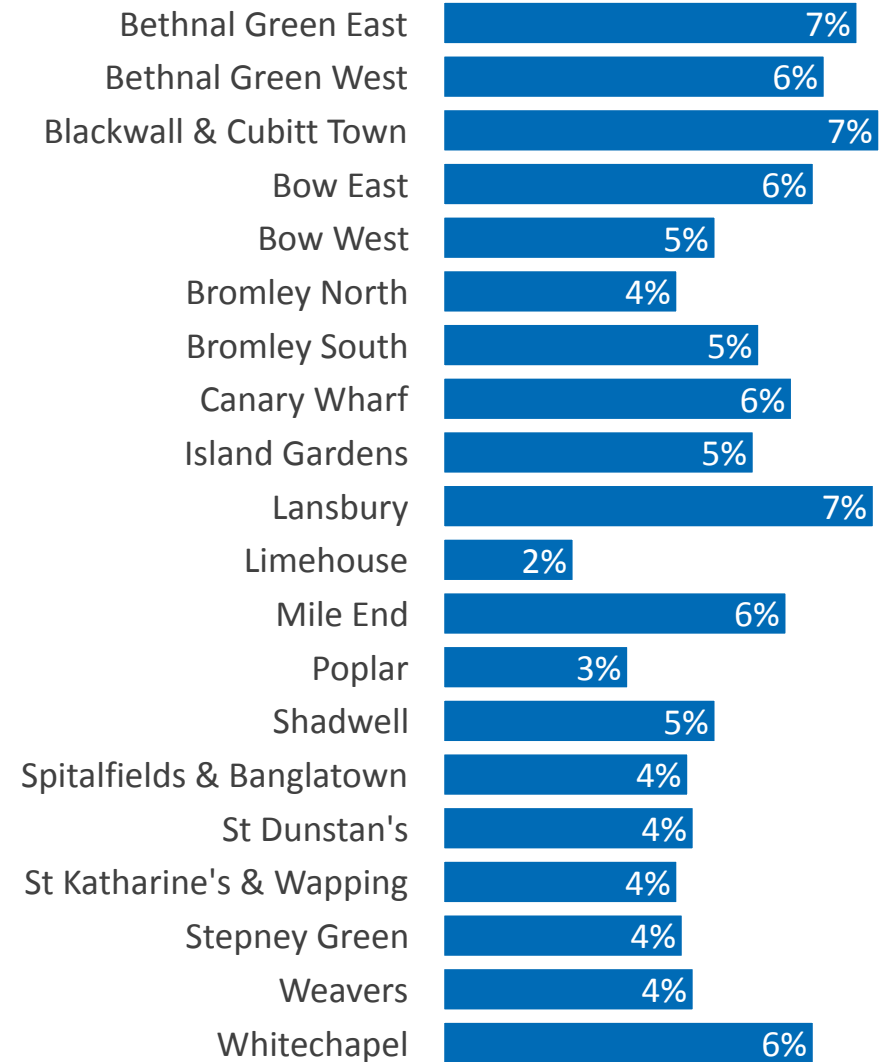
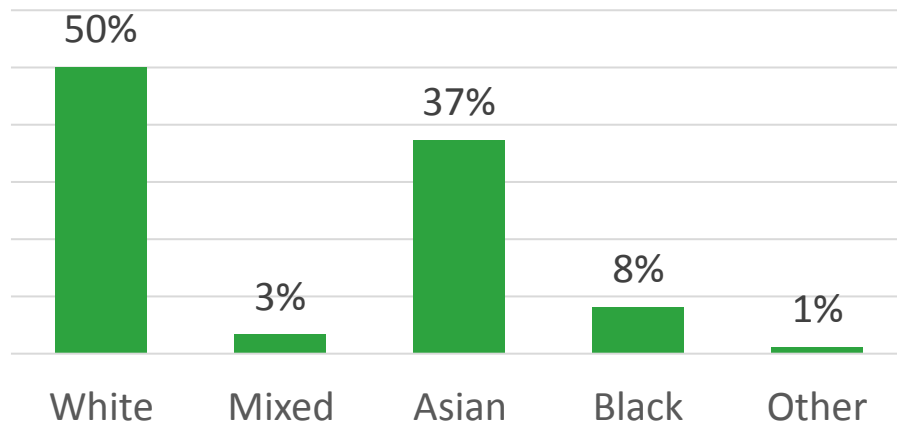
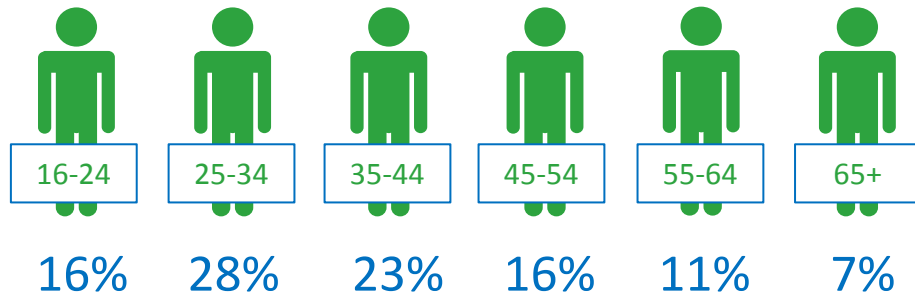
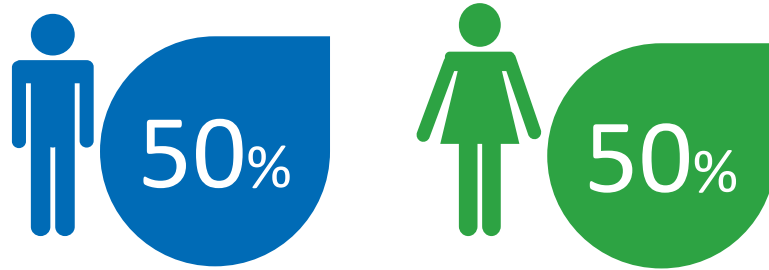
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- The consultation took place between 12th June and 7th July 2023
- A sample of 1,108 residents were interviewed, representative by age, gender, ethnicity and ward. This provides a confidence level of 95% (+/-3%)
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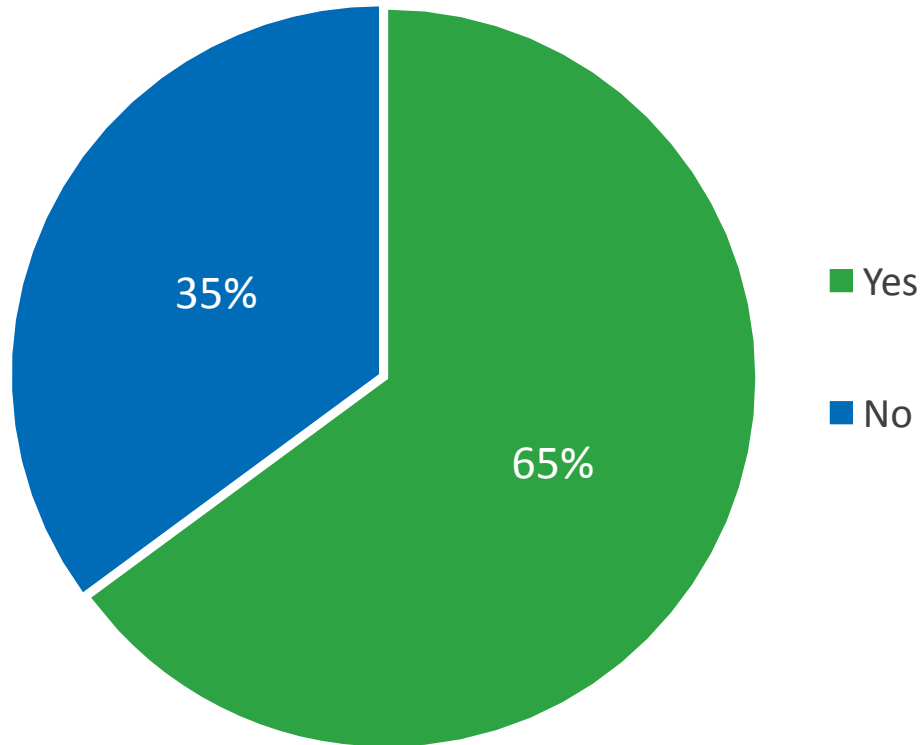
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Respondent Breakdown (1,108)



Just under two-thirds contacted the council in the past 12 months

Have you contacted the council in the last 12 months?



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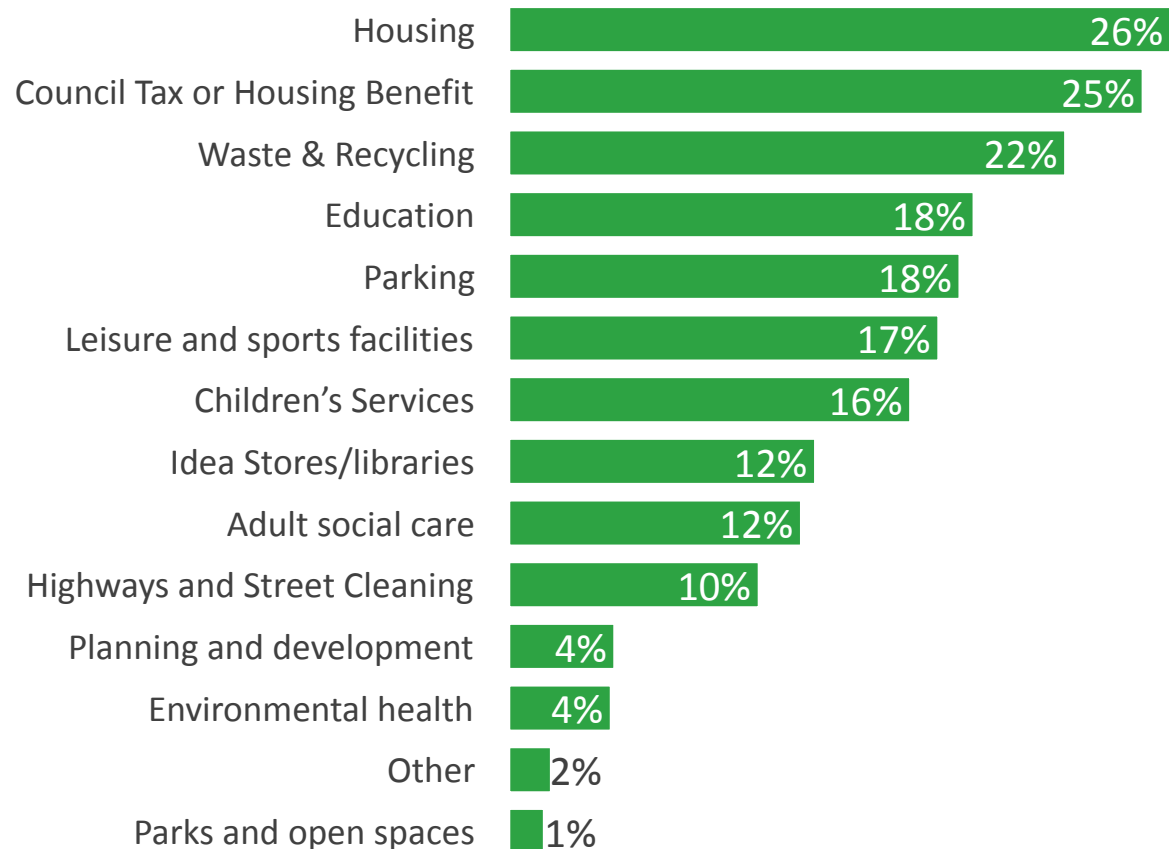


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Most contacted services: Housing; Council Tax or Housing Benefit and Waste and Recycling

If you contacted the council in the last 12 months, please tell us which services you contacted most recently



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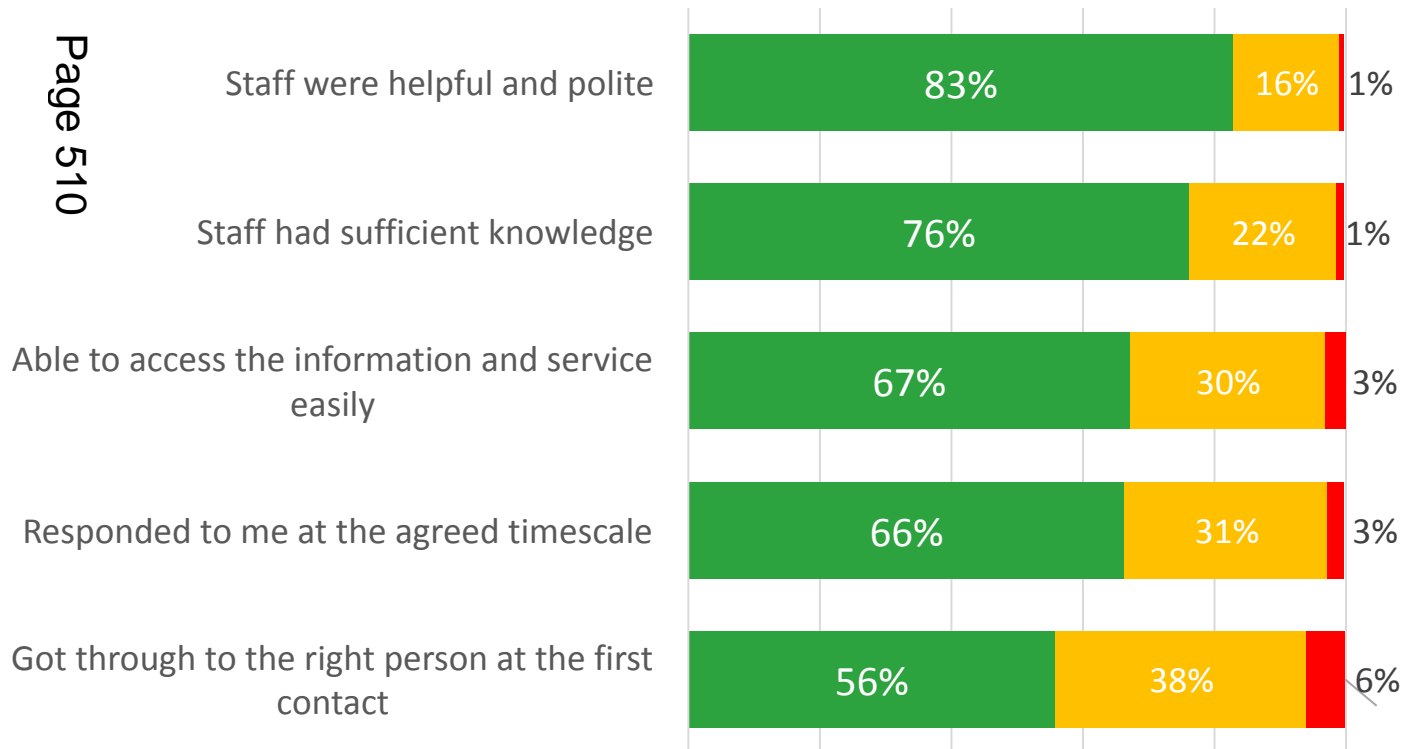
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Page 510

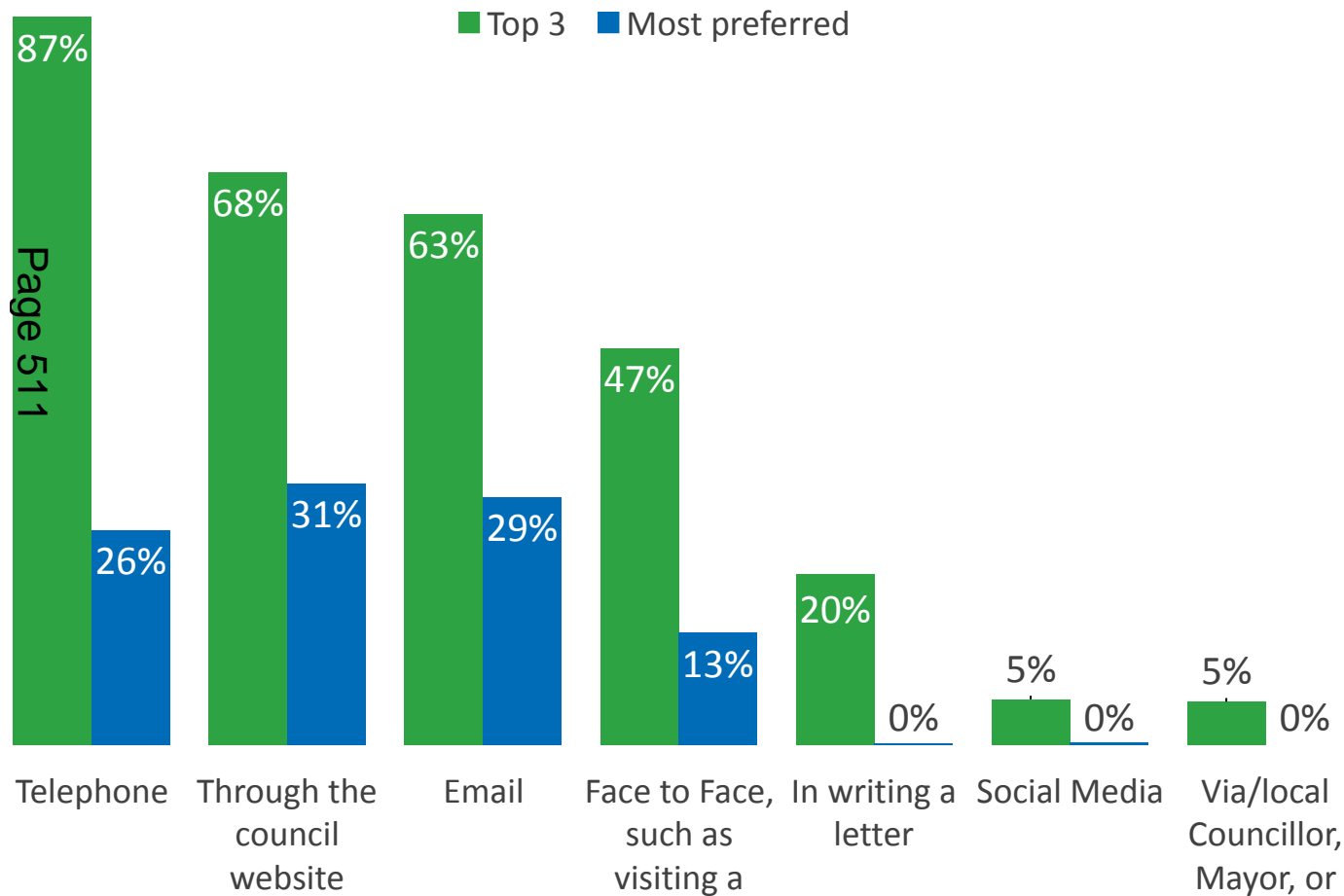


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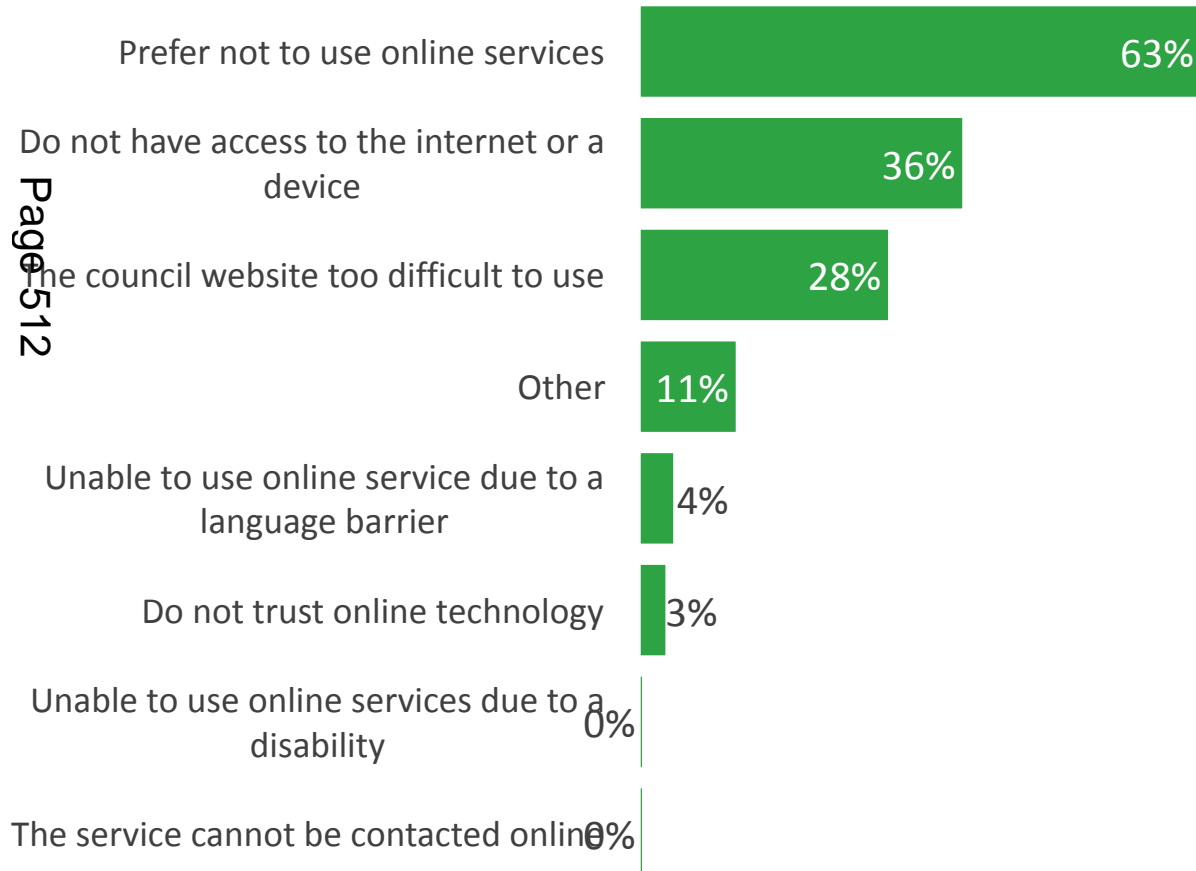


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Page 512

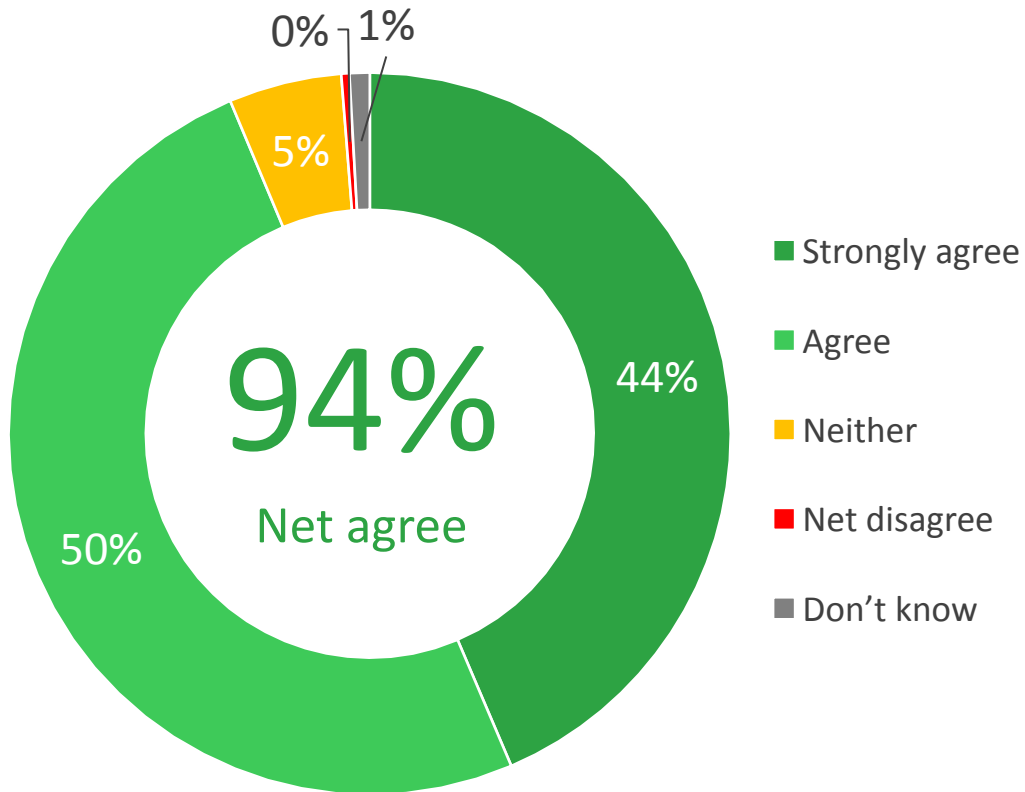


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- Older residents and those with a disability and were more likely to say they do not have access to the internet
- Those from an ethnic minority background and aged between 25 and 44 were more likely to say they prefer not to use online services

Almost all residents agree with the Customer Experience Strategy's vision

Please state to what extent you agree with the Customer Experience Strategy's vision?



Page 513



Key Insights

- Almost all residents say they agree overall with the Customer Experience Strategy's vision
- Nearly half (44%) revealed they strongly agreed with the vision
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High levels of agreement towards each of the Strategy's desired outcomes

Please state to what extent you agree with the Strategy's desired outcomes?

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The council embed a customer-focused culture to deliver an excellent customer experience



Council services are easily accessible, and inclusive



Services are improved by using feedback, data, technology, and innovation



Key Insights

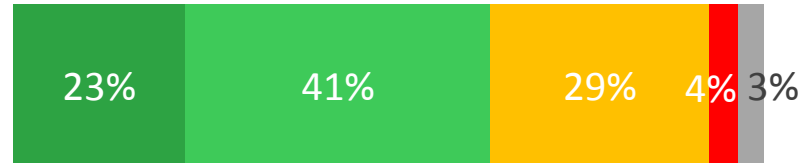
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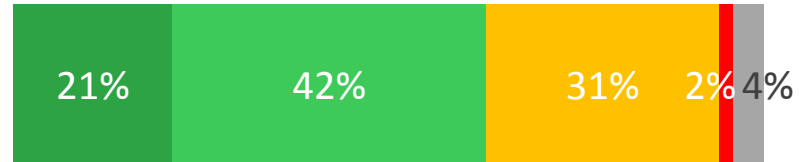
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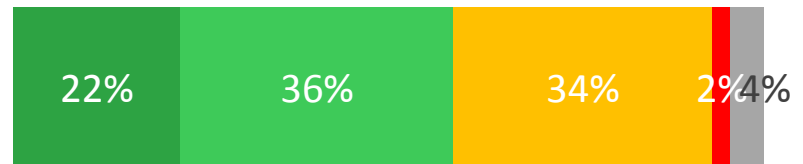
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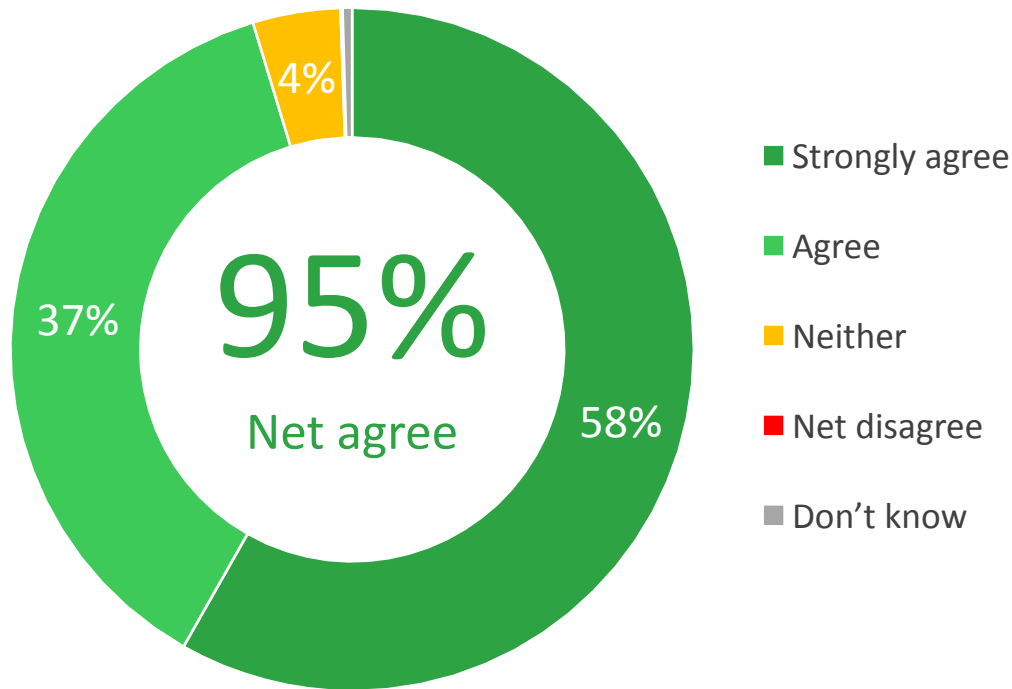
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In summary, the feedback highlights the need for improved service quality, trust-building, the use of technology, a safe environment, community engagement, staff training, time efficiency, and recognition for the council's initiatives. These areas of focus will contribute to a better customer experience and a stronger relationship between the council and its residents.

Q11. Do you have any additional comments?



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London Borough of Tower Hamlets Customer Experience Strategy Survey Results Report (July 2023)



Introduction

Tower Hamlets Council are pleased to introduce the Tower Hamlets Customer Experience Strategy 2023- 2026 – the Council’s first ever customer experience strategy. Excellent customer service is important because it is the interface that connects the Council with its residents.

The Customer Experience Strategy sets the Council’s commitment to improve and enhance the experiences residents have when accessing services.

The strategy sets out the vision to deliver against this commitment and will connect the council with residents, facilitating their easy access to our services and helping them secure a better future. The Council will also work collaboratively with partners, local communities, and individuals to help deliver and shape a positive customer experience.



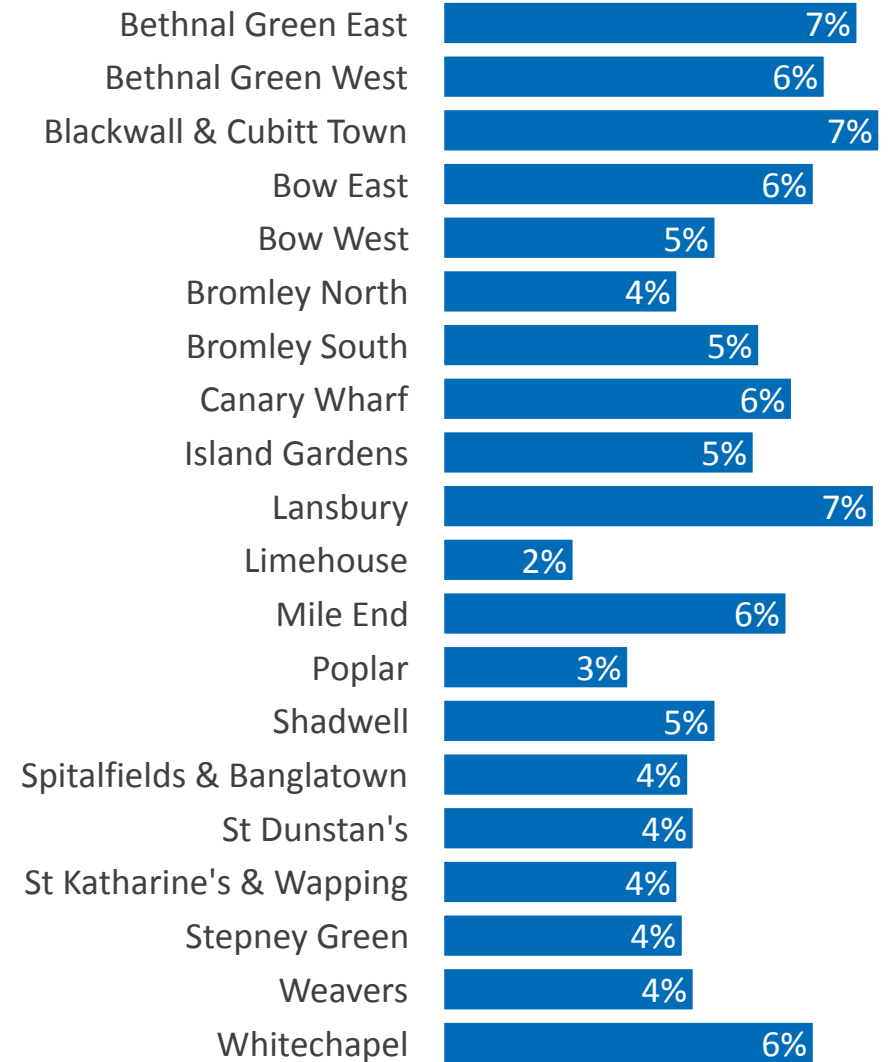
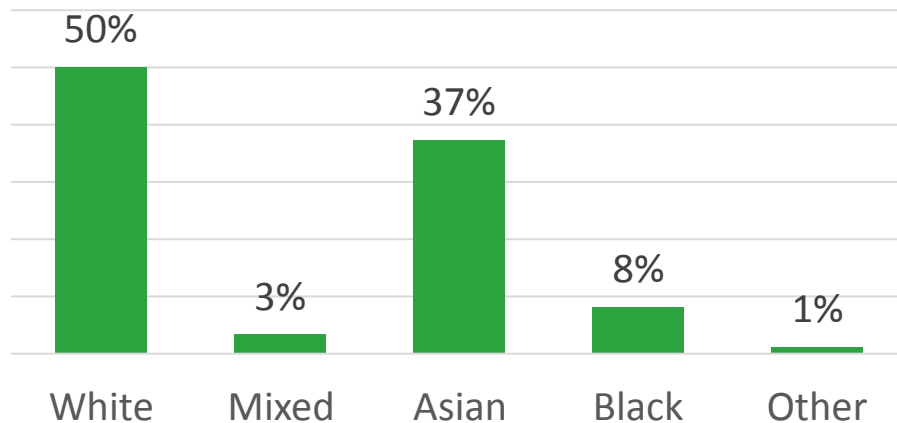
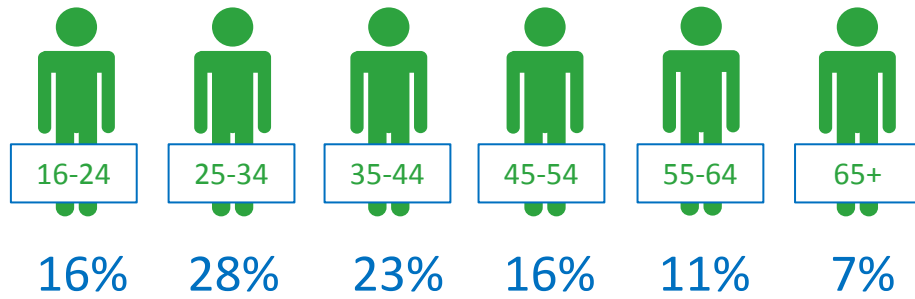
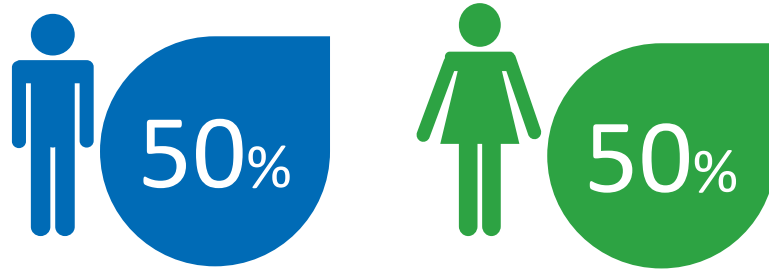
Methodology

- Tower Hamlets Council wish to understand the views of residents and businesses on their Customer Experience Strategy 2023-26
- The Council commissioned Social and Market Research (SMSR Ltd), an independent research agency, to conduct surveys with residents and businesses using Computer Aided Telephone Interviewing (CATI) and on-street using Computer Aided Personal Interviewing (CAPI)
- A questionnaire was designed by key staff at The Council with support from SMSR Ltd during a thorough development phase with input and feedback provided by staff at both organisations in order to validate the script
- The consultation took place between 12th June and 7th July 2023
- A sample of 1,108 residents were interviewed, representative by age, gender, ethnicity and ward. This provides a confidence level of 95% (+/-3%)
- A further 50 interviews were completed with businesses across the borough
- This report provides headline findings together with additional demographic insights

Summary

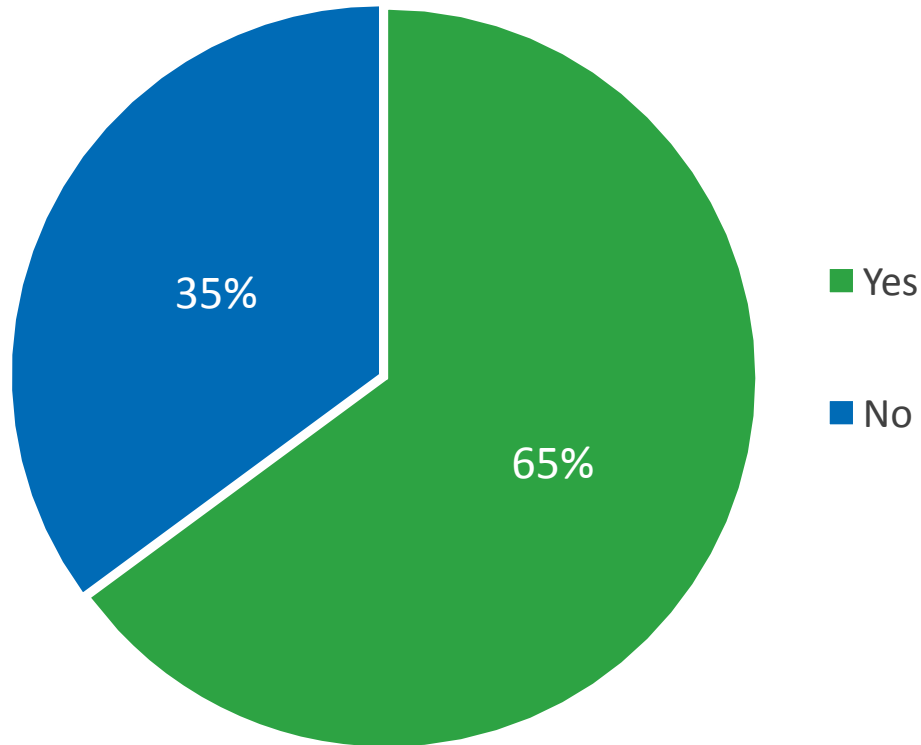
- Around two-thirds (65%) say they have contacted Tower Hamlets Council in the past year; the most frequent services contacted were Housing (26%), Council Tax and Housing Benefit (25%) and Waste and Recycling (22%)
- When contacting the council, more than 8 in every 10 felt staff were helpful and polite and three-quarters agreed that staff has sufficient knowledge to deal with their query (76%). Just over half felt they got to speak to the right person, first time (56%)
- Page 524 When asked to rank three methods of preferred contact with the Council, the top three choices were telephone (87%), website (68%) and email (63%). When only considering the top ranked method, contact via the website was most popular (31%) compared to email (29%) and telephone (26%)
- Of those who did not choose the Council website as a preferred method of contact, almost two-thirds (63%) say they prefer not to use online services
- Almost all residents agree with the Customer Experience Strategy's vision (94%)
- Residents also unanimously agree with the Strategy's three desired outcomes, each receiving an agreement score of 95% or over. Around two-thirds agree these outcomes are currently being met
- The vast majority agree that the Customer Promise is clear about what customers can expect from the Council and what the Council can expect from its customers?

Respondent Breakdown (1,108)



Just under two-thirds contacted the council in the past 12 months

Have you contacted the council in the last 12 months?



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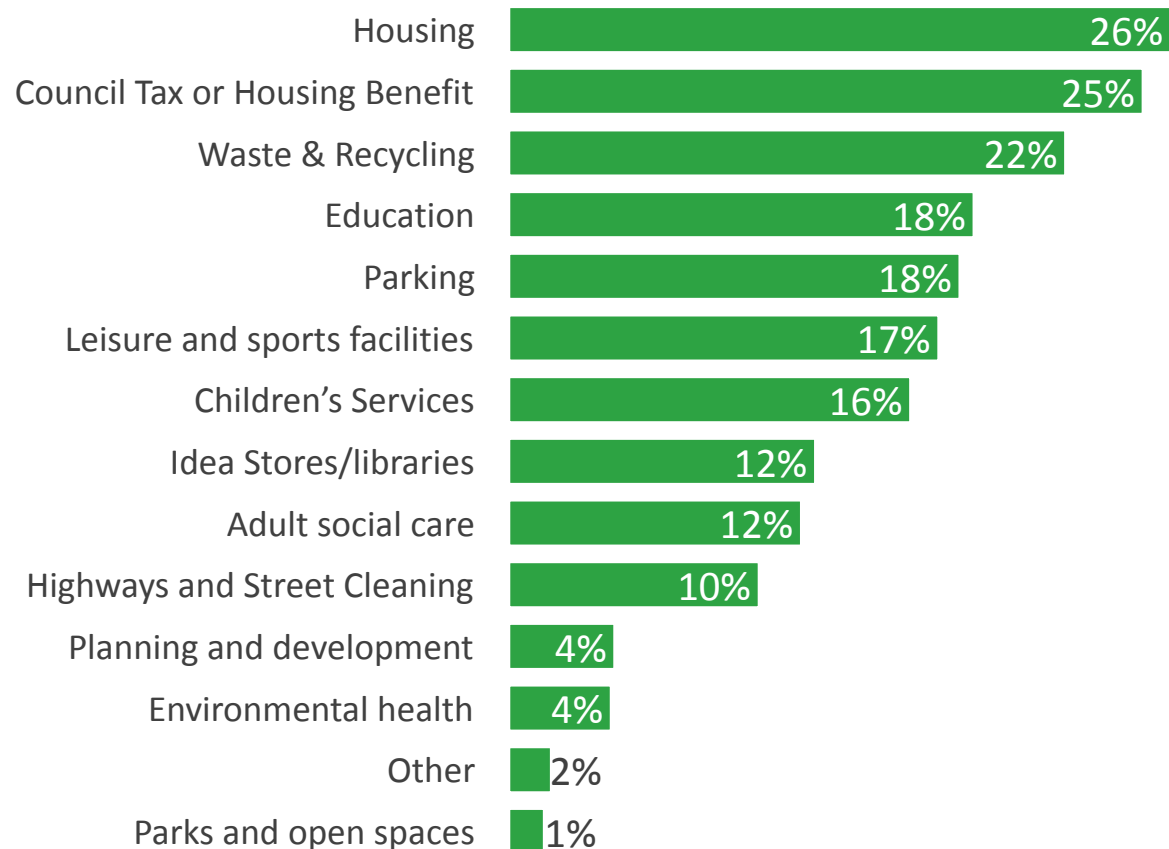


Key Insights

- Just under two-thirds (65%) had contacted the council over the past 12 months
- Males more likely than females to have contacted the council
- Those aged 35-44 and 75+ more likely to have contacted the council, those aged 55-64 and 65-74 less likely
- Residents with a disability and ethnic minority respondents less inclined to have contacted the council
- Residents in Bethnal Green, Bow West, Bromley North, Limehouse, St Katharine's & Wapping and Stepney Green less likely to have contacted the council
- Residents in Blackwall & Cubitt Town, Bow East, Bromley South, St Dunstan's, St Peter's and Weavers most likely to have contacted the council

Most contacted services: Housing; Council Tax or Housing Benefit and Waste and Recycling

If you contacted the council in the last 12 months, please tell us which services you contacted most recently



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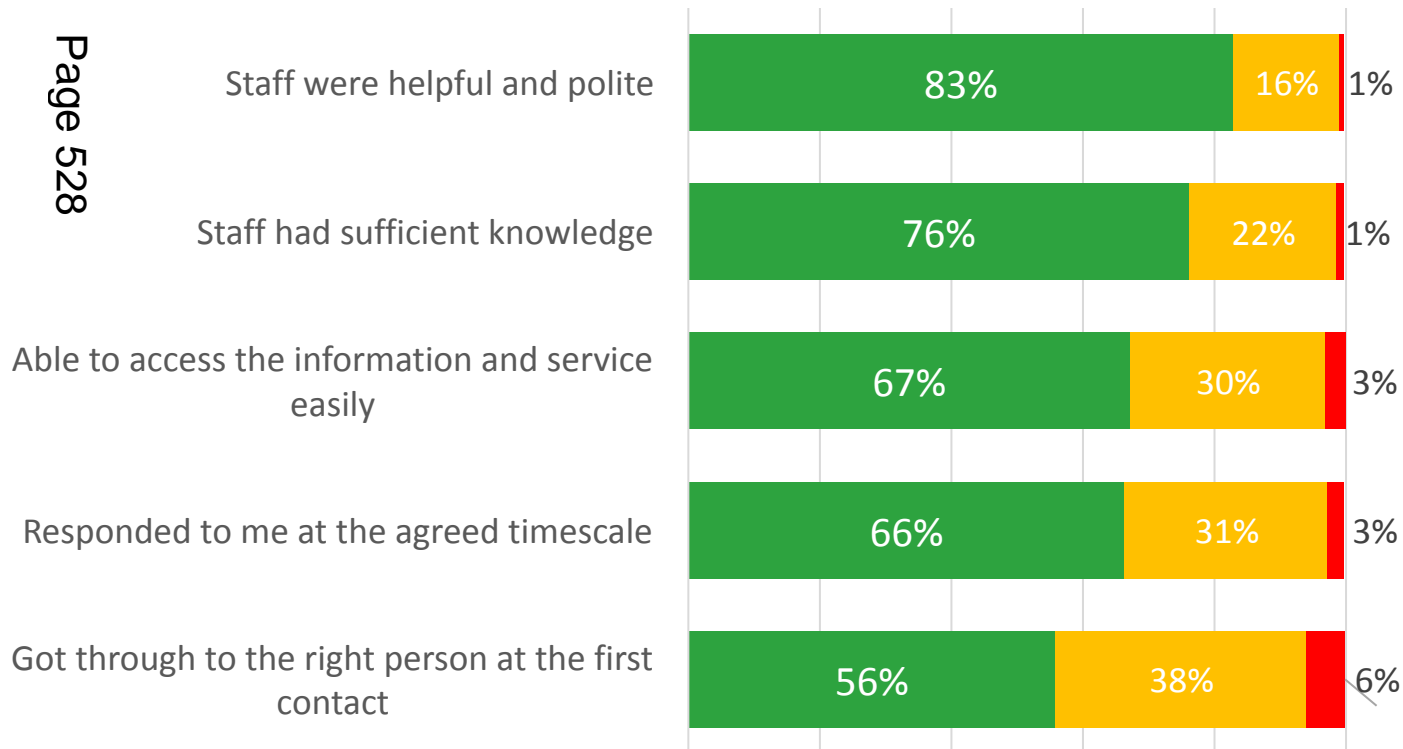
Key Insights

- Around a quarter contacted the council regarding Housing (26%) or Council Tax or Housing Benefit (25%). Just over a fifth made contact regarding Waste & Recycling (22%)
- Just under a fifth contacted the council regarding Education (18%), Parking (18%), Leisure and sports facilities (17%) and Children's Services (16%)
- Residents from an Ethnic Minority Background more likely to have contacted the council regarding both Housing and Council Tax or Housing Benefit compared to White respondents

More than 8 in every 10 found staff helpful and polite; three quarters say staff had sufficient knowledge

Thinking about your most recent experience with the council, please state to what extent you agree with the statements below:

■ Net agree ■ Neither agree nor disagree ■ Net disagree

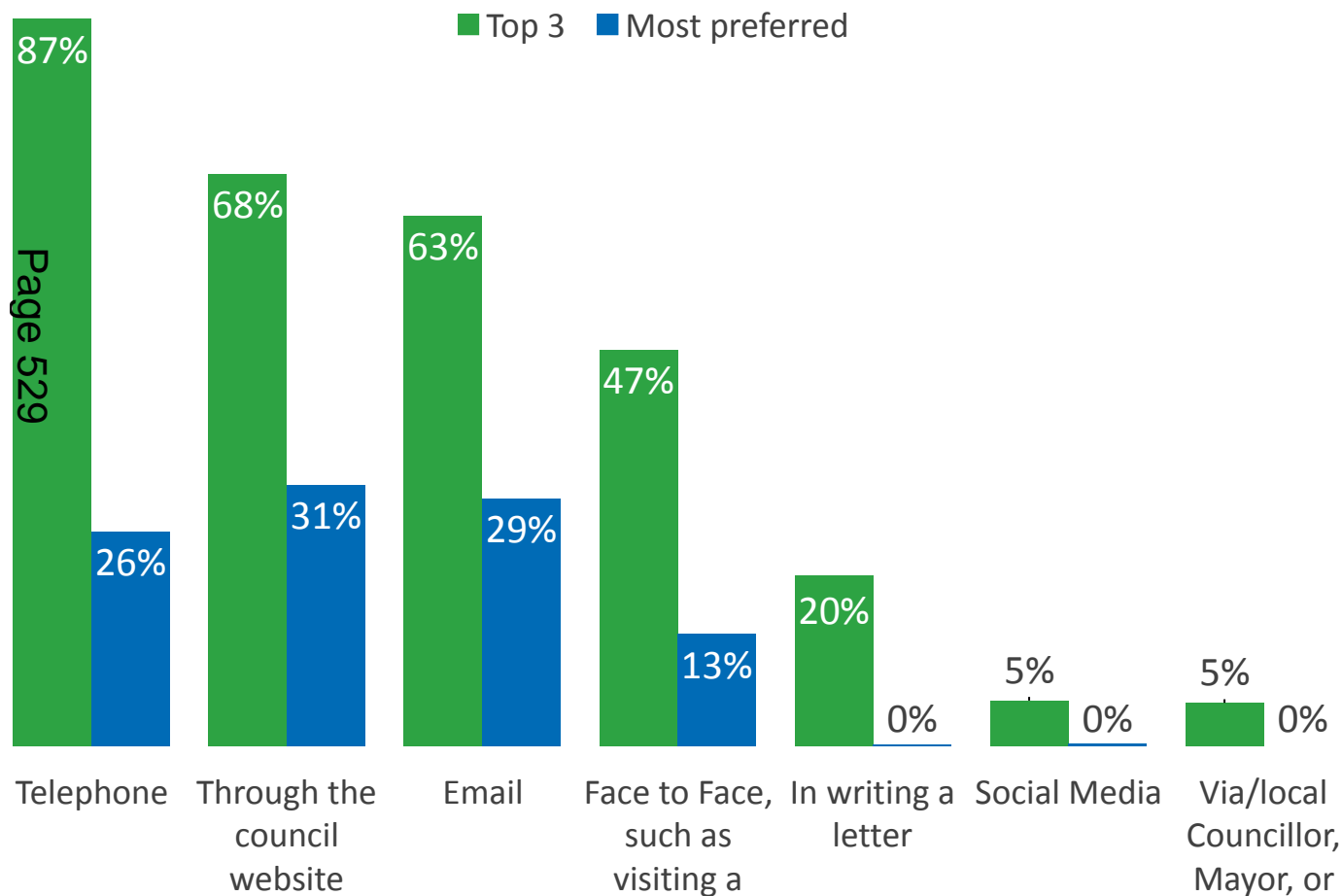


Key Insights

- More than 8 out of every 10 found Council staff to be helpful and polite and three-quarters (76%) felt staff had sufficient knowledge to answer their query
- They majority agreed they were able to access the information and service easily (67%) and felt the council responded in the agreed timeframe (66%)
- Just over half got through to the right person at the first contact (56%)
- Low levels of disagreements to all statements
- Significant levels of neutral response to statements may indicate some modes of contact may not be applicable to the statements

Contact via the council website most preferred method alongside email and telephone

How would you prefer to contact the council? (RANK TOP THREE)

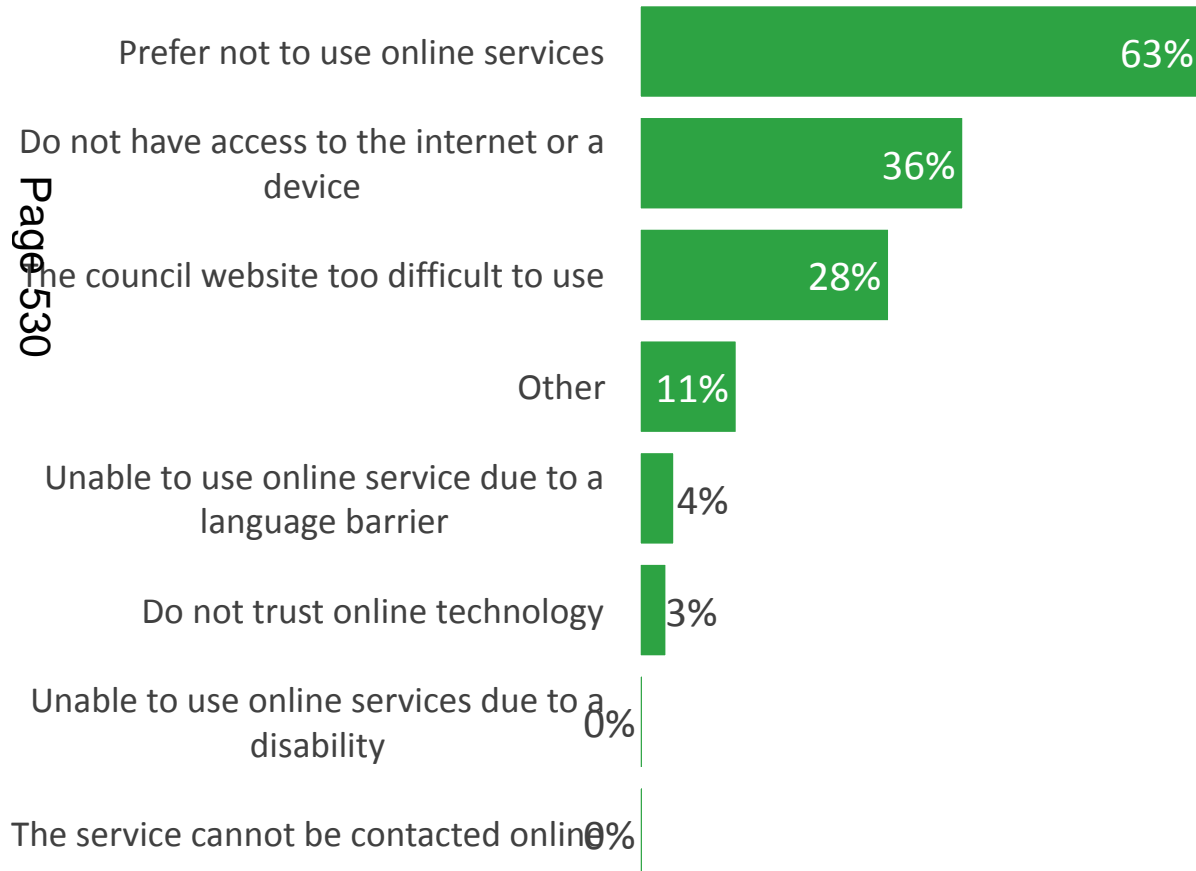


Key Insights

- Overall, when given three choices, almost nine-tenths (87%) chose telephone contact as a preferred method. Around two thirds chose a digital method: council website (68%) and email (63%). Less than half chose face-to-face (47%)
- However, when considering respondents' preferred choices (no 1 ranked method), the majority chose a digital mode of contact: council website (31%) and email (29%). The majority of the remaining respondents chose telephone contact (26%)
- Fewer said they prefer face-to-face contact (13%)
- Overall, older residents, those with a disability and ethnic minority groups more inclined prefer telephone contact

Three quarters of those who would not choose to contact the council via the website prefer not to use online services

If you would not choose to contact the council using our website/
online service, please tell us why?



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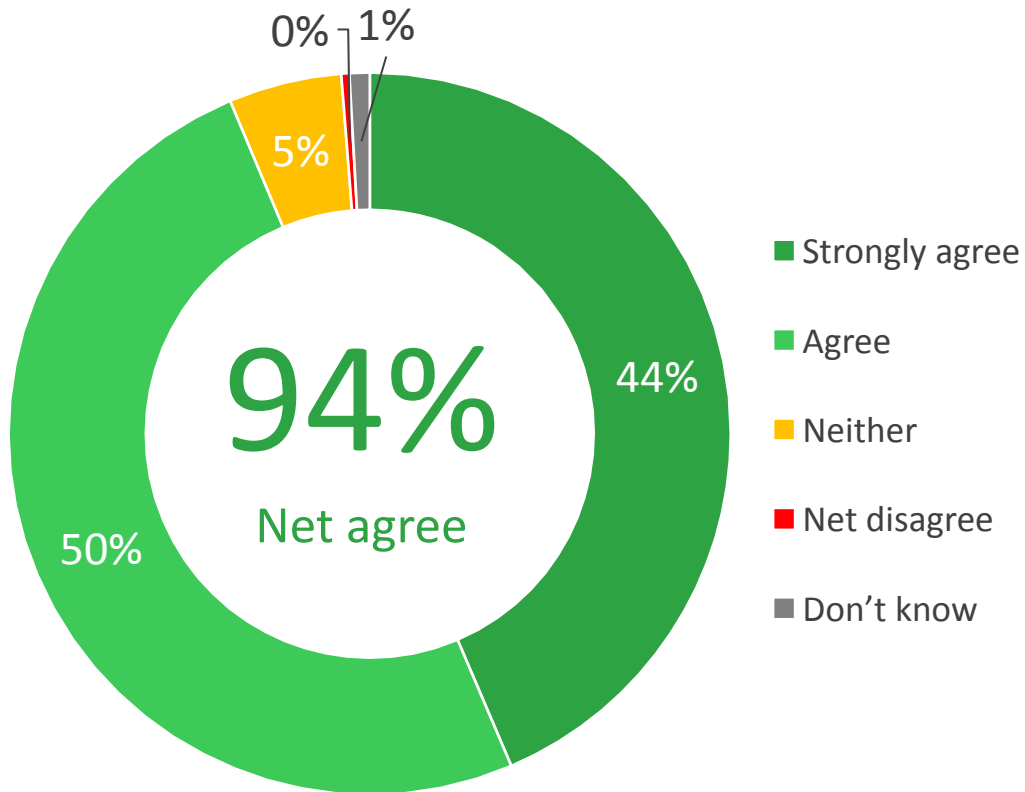


Key Insights

- The most frequent reason residents who did not choose to contact the council via website/online services was Prefer not to use online services (63%)
- This implies the majority would not choose this method of contact, rather than consider it a barrier to engagement. This may reflect preference of personal interaction, response time, complexity of query, mistrust of online privacy etc.
- However, Just over a third (36%) said it was due to not having access to the internet and more than a quarter (28%) said the council website was too difficult to use. A tenth (11%) gave another reason, mainly involving a lack of IT skills
- Older residents and those with a disability and were more likely to say they do not have access to the internet
- Those from an ethnic minority background and aged between 25 and 44 were more likely to say they prefer not to use online services

Almost all residents agree with the Customer Experience Strategy's vision

Please state to what extent you agree with the Customer Experience Strategy's vision?



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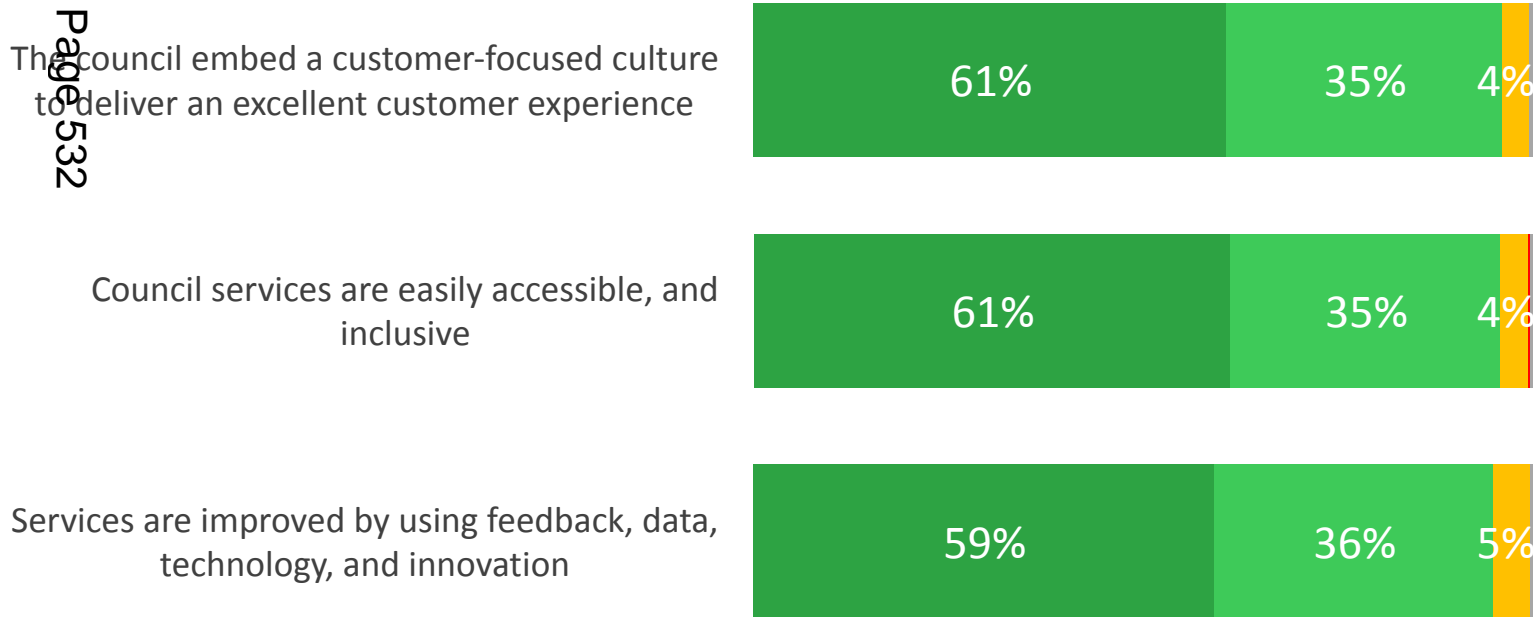
Key Insights

- Almost all residents say they agree overall with the Customer Experience Strategy's vision
- Nearly half (44%) revealed they strongly agreed with the vision
- Less than a percent disagreed with the Customer Experience Strategy's concept
- A small percentage (5%) say they neither agree nor disagree with the vision

High levels of agreement towards each of the Strategy's desired outcomes

Please state to what extent you agree with the Strategy's desired outcomes?

■ Strongly agree ■ Agree ■ Neither agree nor disagree ■ Net disagree ■ Don't know



Key Insights

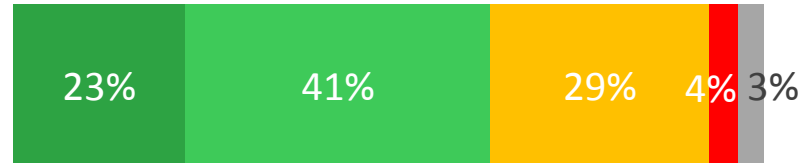
- Residents were unanimous in their overall agreement towards the strategy's desired outcomes
- Overall agreement levels were similar for all three statements exceeding 95% for all three statements
- Around three-tenths of residents stated they strongly agreed with each statement
- Disagreement levels extremely low towards all three statements (either 0% or <1%)

Just under two-thirds feel council services are easily accessible and inclusive

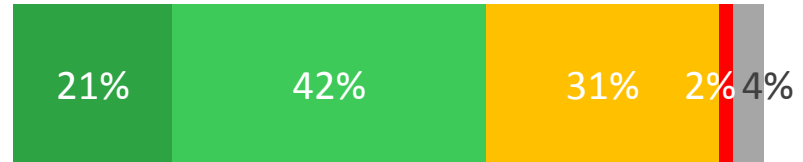
To what extent do you think Tower Hamlets Council currently meet these outcomes?

■ Strongly agree
 ■ Agree
 ■ Neither agree nor disagree
 ■ Net disagree
 ■ Don't know

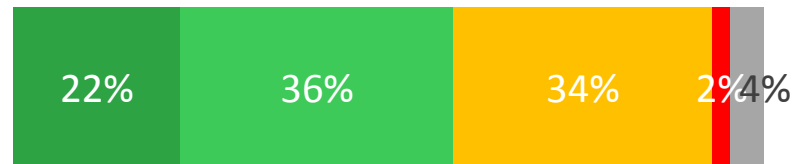
Council services are easily accessible, and inclusive



Services are improved by using feedback, data, technology, and innovation



The council embed a customer-focused culture to deliver an excellent customer experience



Key Insights

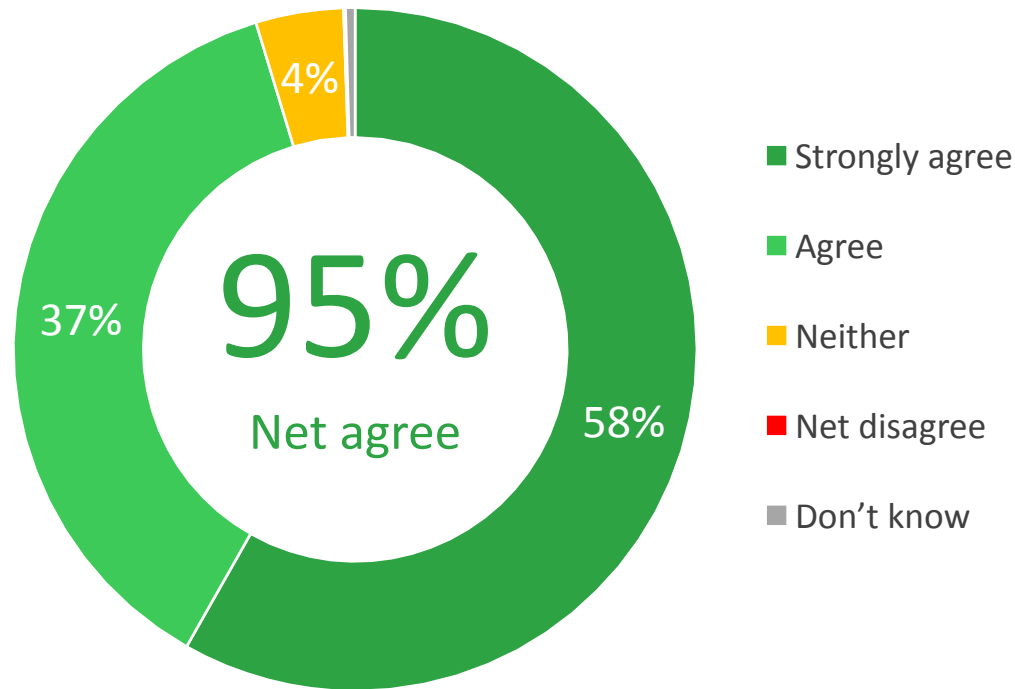
- Agreement with each outcome recedes by around a third when asked if the Council currently meet them. Agreement levels replaces mainly with neutral response of neither agree nor disagree
- Around three-fifths agree the council is currently meeting each outcome
- Disagreement low for all three statements (less than 4%)
- Agreement levels tended to be higher amongst those aged 16-24, 25-34, 75+, males and White respondents
- Agreement levels tended to be lower amongst those aged 45-54, 55-64, 65-74, females, those with a disability or from an ethnic minority background

Are any additional outcomes which should be included (Top 10 themes)

- Enhance Access: Make accessing council services easier, particularly by improving phone-based access and simplifying the navigation of options.
- Increase Local Offices: Establish more local offices to provide in-person assistance and support, ensuring residents can receive help directly and easily.
- Improve Communication: Enhance communication channels, available contact methods, promote online services.
- Strengthen Staff Training: Provide training programs to improve staff knowledge, performance, responsiveness, and professionalism.
- Streamline Processes: Simplify processes, such as school admissions and building regulations, to make them easier and more straightforward for residents.
- Enhance Accountability: Implement measures to monitor and evaluate staff service delivery, ensuring accountability and addressing any issues promptly.
- Collaborate with Other Agencies: Continue collaborating with other agencies and community services to deliver integrated and effective services.
- Improve Feedback Mechanisms: Establish reliable and accessible feedback systems, including alternative options for providing feedback besides online.
- Focus on Specific Needs: Address the needs of specific groups, such as senior citizens, children with special needs, vulnerable individuals, and key workers.
- Enhance Community Engagement: Organise community meetings, consultations, and involvement activities to encourage residents' active participation and ensure their voices are heard.

The vast majority feel the Customer Promise is clear about what customers can expect

To what extent do you agree that the Customer Promise is clear about what our customers can expect from us and what we expect from our customers?



Key Insights

- Residents deemed the Customer Promise to be clear about what they can expect and what the Council can expect from them
- The vast majority say they agree with this statement
- A small percentage provided a neutral response, stating they neither agree nor disagree
- Less than a percent say they disagree with the statement

Summary of other comments

Residents were asked to provide any additional comments on the Customer Experience Strategy.

The proposed plans and vision of the council are generally appreciated and welcomed, with residents expressing gratitude for the efforts to improve customer services and the overall quality of life in the borough.

Comments provided about the Council's Customer Experience plan focused on several key themes. Residents expressed a strong desire for the maintenance and improvement in the quality of services provided by the council. They also emphasise the need for high standards and quality staff to best meet their needs. Furthermore, there is a strong emphasis on staff training and knowledge enhancement to ensure professionalism and improve service delivery. Time efficiency is another crucial aspect, with residents calling for realistic time frames and quicker responses.

The use of technology and social media platforms is seen as essential for effective communication, community engagement, and gathering feedback. However, care needs to be taken to ensure that methods of communication are available to suit the needs of more vulnerable groups or those who are not so confident in using online systems. Engaging and involving the community in decision-making processes and establishing regular feedback mechanisms are also highlighted as important factors for a successful customer experience.

Residents also stress the importance of trust and reputation, believing that if the council delivers on its proposed plans, it will gain the trust of the community and be held in high regard.

In summary, the feedback highlights the need for improved service quality, trust-building, the use of technology, a safe environment, community engagement, staff training, time efficiency, and recognition for the council's initiatives. These areas of focus will contribute to a better customer experience and a stronger relationship between the council and its residents.

Q11. Do you have any additional comments?



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Customer Service Strategy – evidence pack



Summary - findings from the data: Environment we are in



High service demand

- **The council is facing high service demand** suggested by the demography trend, high level of poverty and the cost of living crisis. A study suggests that households finances will remain squeezed in 2023/24. Policy is supporting poorer, but not all poorer households will get cost of living payments, including the poorest 20%.

Demand for various channels

- In 2021, **92% of the borough households had the internet at home**, which is on a par with the national level. However, it is known that a **small proportion of adults (14% nationally) do not use the Internet**.
- Research identified background of **those who are unlikely to use the Internet**. They include: early education leavers, many children in a house, 65+ year old and low-income background.



Summary - findings from the data: Council services



Inconsistent customer experience

- Mid pandemic residents survey in 2021 shows:
 - 73% thought the council has staff who are friendly and polite.
 - 66% - the council is doing a good job
 - 59% - the council is difficult to get through to on the phone
 - 44% - the council responds quickly when asked for help
- Users of some services responded to these questions slightly positively or negatively. **Customer experience of different council services may be inconsistent.**

Collection of customer feedback

Some services collected customer feedback on customer experience.

- Children and Family Centres user feedback 2022
 - Overall, the users found they felt welcomed at the centres. Most users were satisfied with the services.
 - 75% of the respondents found the centres' communications and publications accessible.
- Personal Social Services Adult Social Care Survey 2021/22
 - Over 85% of the users were satisfied with the services.
 - 65% of the respondents found that the way they were helped and treated made them think and feel better about themselves
 - About 45% of the respondents found finding information and advice were generally easy. 33% have never tried to find info.
- Idea Store Learning
 - Vast majority (97-98%) of Idea Store learners were satisfied with the courses they undertook in 2021/22



Summary - findings from the data: Council services



Channels – Call centre, Residents Hub and Digital access

- The most popular themes of **Residents Hub** visitors was **Housing** (59%), followed by **Council Tax** (20%), **Housing benefit** (8%) and **Welfare benefits** (6%). In Mar-Dec 2022, Residents Hub received 6,779 visits.
- The council **website** had over 1million visits in July-Sept 2022. The website is seen more accessible than the Local Government benchmark. The council aims to use Plain English more on the website.
- The number of people who registered to use **online forms** steadily increased every quarter from January till September 2022. 95% of bulky waste requests were made online in July-Sept 2022.
- The council received over 9,000 **social media requests** at every quarter between January and September 2022.

Top 3 most contacted services by service users

- **Parking, Council Tax** and **Waste service**

Rooms for improvement

- Reduce waiting time to respond to phone calls and emails sent by service users
- Rewarding staff based on customer satisfaction performance
- Share customer experience performance with key external stakeholders
- Involve customers in the development of new services.



About the borough: Census 2021 results

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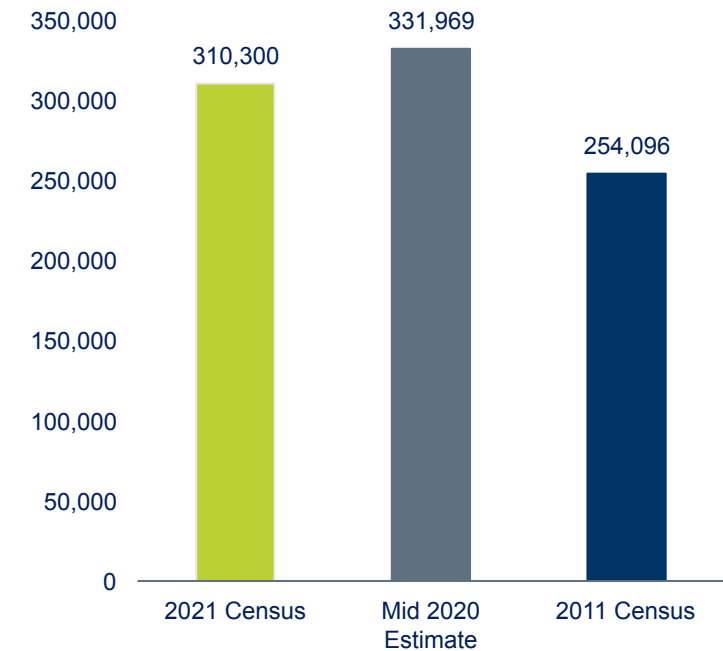
Tower Hamlets had the fastest growing population in England and Wales



- As of Census Day on 21 March 2021, the population of Tower Hamlets was 310,300*, which was an increase of 56,200 or 22% since 2011.
- This was the fastest growing population of any local authority area in England and Wales. The population grew by 6.6% in England and Wales during this period.
- In the same period, Dartford had 20% increase; Bedford, Barking and Dagenham, Cambridge and Peterborough had 18% increase.

*2021 first release data is rounded to nearest 100

Tower Hamlets, 2021 Census, 2011 Census and Mid 2020 Estimate

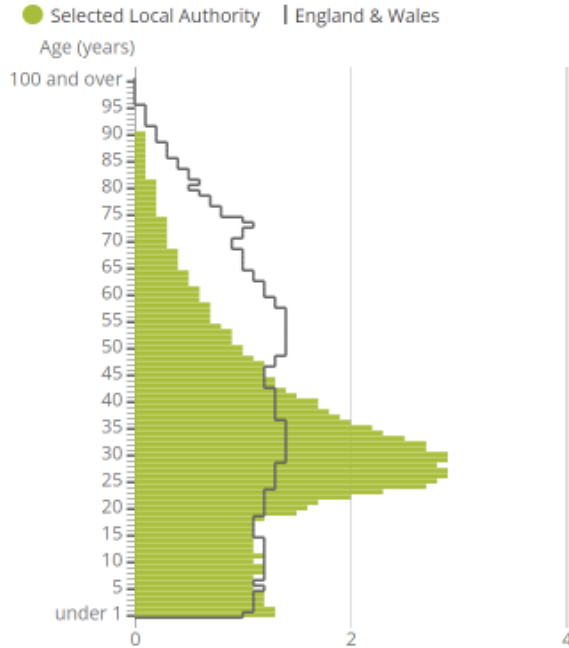


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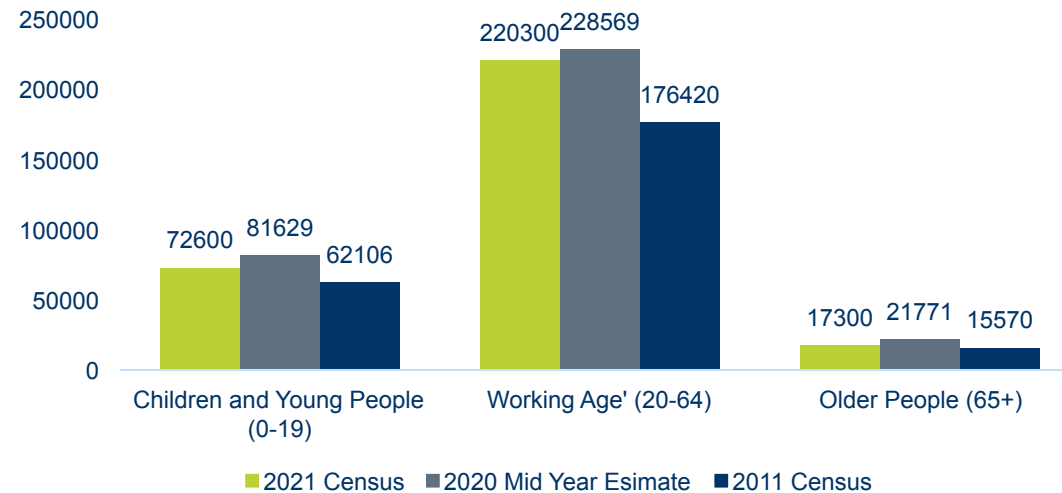
Census year	Tower Hamlets' population rank (of 33 London boroughs)
1991	28 th
2001	23 rd
2011	17 th
2021	10 th



Age - the working age group had the largest proportionate rise



Tower Hamlets Population by Age Group, 2021 Census, 2011 Census and Mid 2020 population estimate



- The number of all age groups increased since 2011.
- The local authority with the lowest median age was Tower Hamlets (30 years), followed by University towns like Nottingham, Cambridge, Oxford and Manchester (all 31 years)
- The borough had 17,300 people aged 65+. Tower Hamlets is the only local authority area in the country to have less than 6% of the population aged 65+ (5.6%)

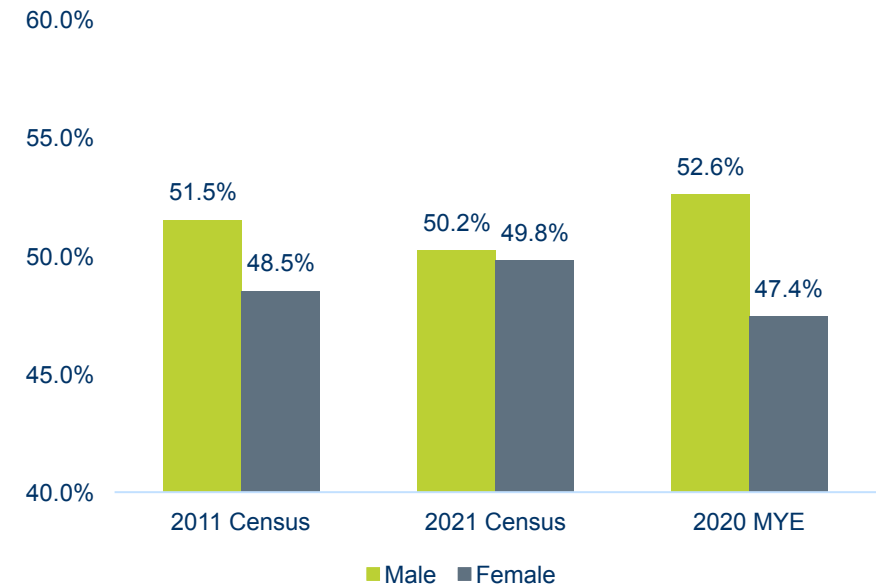


Sex – the borough had the 4th highest proportion of males in England and Wales

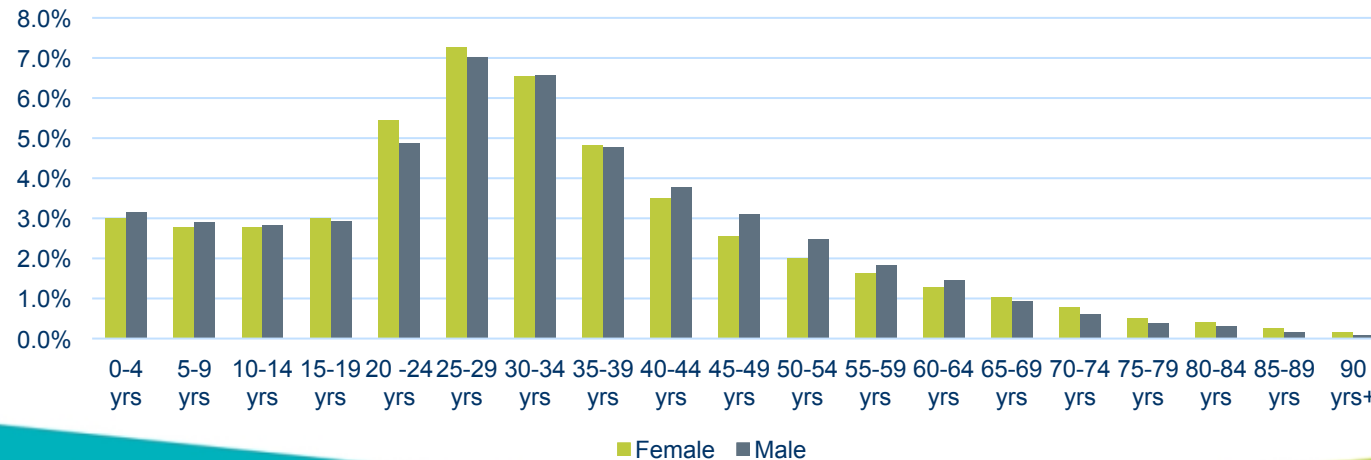


- Tower Hamlets was one of only 11 local authority areas where males formed the majority of residents.
- In 2021, the proportion of residents who were male was 50.2%, slightly more than those who were female (49.8%). This represented a narrowing gap between males and females when compared with 2011 and a considerably smaller gap than the 2020 MYE had forecast.
- There are generally more males than females across all of the five year age groups with the exception of 20-24 year olds, 25-29 year olds, 35 – 39 year olds and over 65s where there are more females than males.
- Nationally the population is ageing; 18.6% of people are aged 65+. London in general has a younger age profile.

Proportion of residents by sex, 2011 Census, 2021 Census and Mid Year 2020



Population Distribution by Age and Sex %, 2021 Census

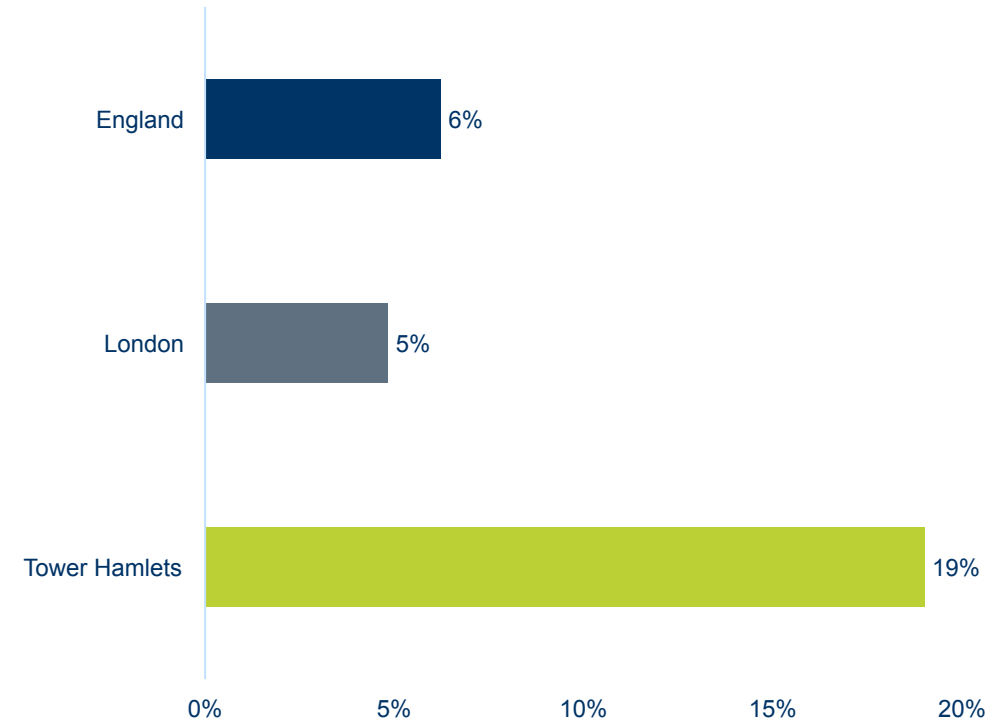


The number of households in the borough – the largest increase in the country since Census 2011

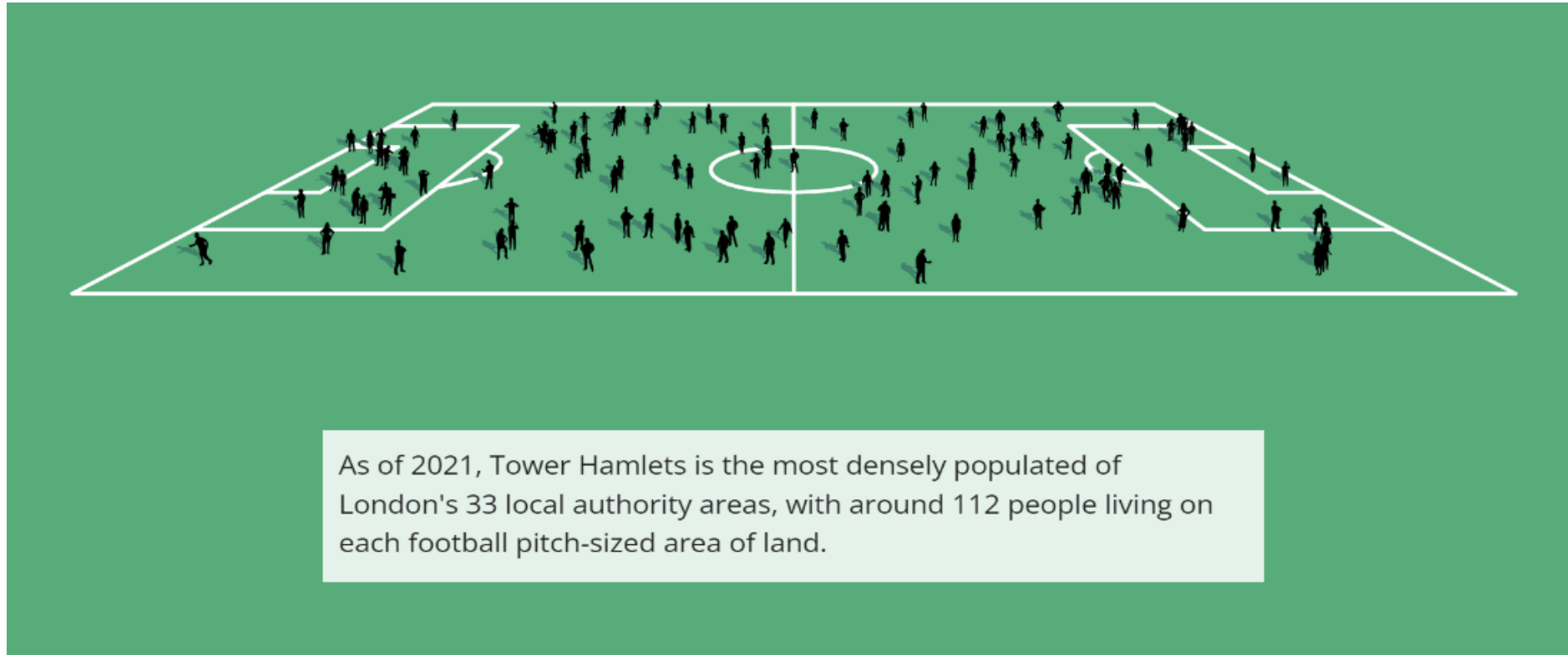


- Tower Hamlets added an additional 19,200 households between 2011 and 2021 with the total number of households increasing from 101,257 to **120,500**.
- This represented a **19% increase**, the largest increase in households of any local authority areas in England and Wales.
- There were slightly more persons per household than in 2011 with the average household size moving from 2.51 in 2011 to 2.58 in 2021.

% Increase in number of households 2011 Census to 2021 Census, Tower Hamlets, London and England



Tower Hamlets had the highest population density in England and Wales



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- Tower Hamlets: 15,695 people/km²; Islington: 14,578 people/km²; Hackney: 13,611 people/km²
- Tower Hamlets has 19.8 km² and the 6th smallest borough in London (including the City of London). Islington has 14.9 km² and Hackney 19 km².



48% of the borough residents were born outside UK



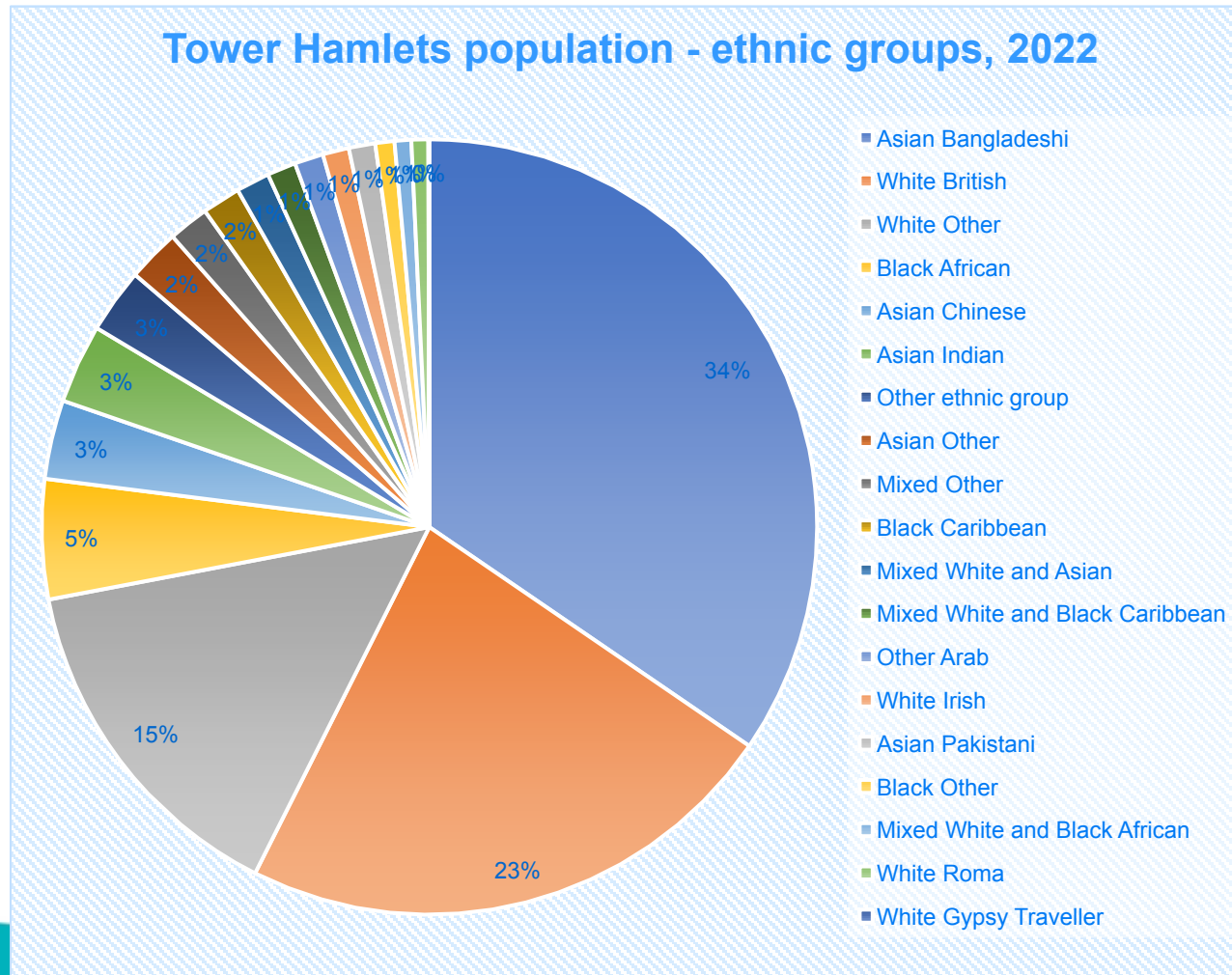
- **53.2% of Tower Hamlets residents were born in the UK**, compared with 56.9% in 2011. In England, 78.3% of residents were born in the UK in 2021 and in London 59.4% were born in the UK.
- 21.9% of Tower Hamlets residents were born in the Middle East or Asia, more than half are accounted for by people born in Bangladesh. **Bangladeshi born residents were by far the largest group after UK born residents (43,561, 14.0%) in Tower Hamlets.** The number of Bangladeshi born residents has increased from 2011 but the **proportion** has gone down slightly (from 15%).
- **4,818 residents in Tower Hamlets were born in China** (not including Hong Kong), the fourth highest total in the country behind the considerably larger cities of Birmingham, Manchester and Sheffield. There were also 1,865 Tower Hamlets residents born in Hong Kong, the 10th highest number in England.
- **13.9% of Tower Hamlets residents were born in the European Union** (including the Republic of Ireland). This was much higher than England where 6.0% were born in the EU and slightly higher than London (12.8%).
- By far the largest number of EU born residents in Tower Hamlets were from Italy and there was a very significant increase in the number of Italian born residents between 2011 and 2021 (from 3,047 in 2011 to 10,553 in 2021).
- **Tower Hamlets has the largest number of Italian born residents of any local authority area in England and Wales.** While the ONS have not yet released ethnicity data, this increase is consistent with the known population of Italian nationals of Bangladeshi origin.
- The number of **Romanian** born Tower Hamlets residents also rose very significantly between 2011 and 2021, increasing almost fivefold from 587 to 2765 between 2011 and 2021.
- 13,161 (4.2%) of Tower Hamlets residents were born in Africa. This included 3,107 (1.0%) born in Somalia. This was higher than England (2.6%) and lower than London (7%).



Asian Bangladeshi was the largest ethnic group in the borough in 2022



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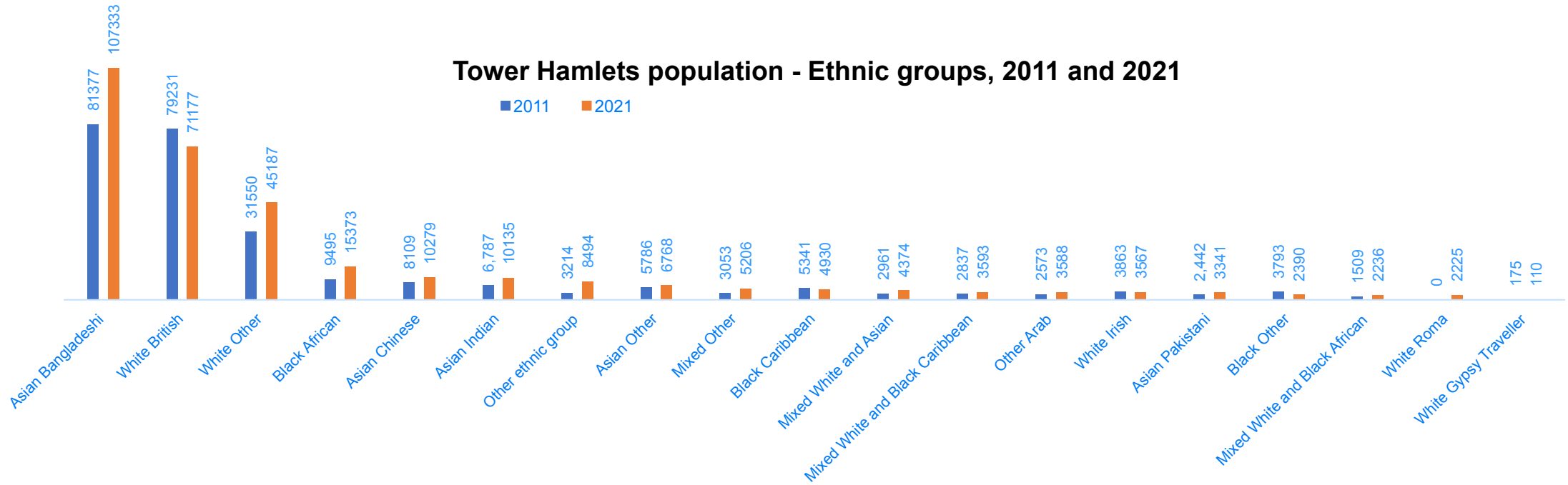
- 35% of the borough population were Asian Bangladeshi, followed by White British (23%) and White Other (15%)



Asian Bangladeshi population had the largest increase in number from 2011



Tower Hamlets population - Ethnic groups, 2011 and 2021



- Asian Bangladeshi increased by 25,956 (+32%) from 2011, which is the largest increase in number. This is followed by Black African (+5,878; +62%) and Other ethnic group (+5,280; +164%).
- White British had the largest decrease (-8,054; -10%), followed by Black Other (-1,403; -37%).



Poverty – child and older people

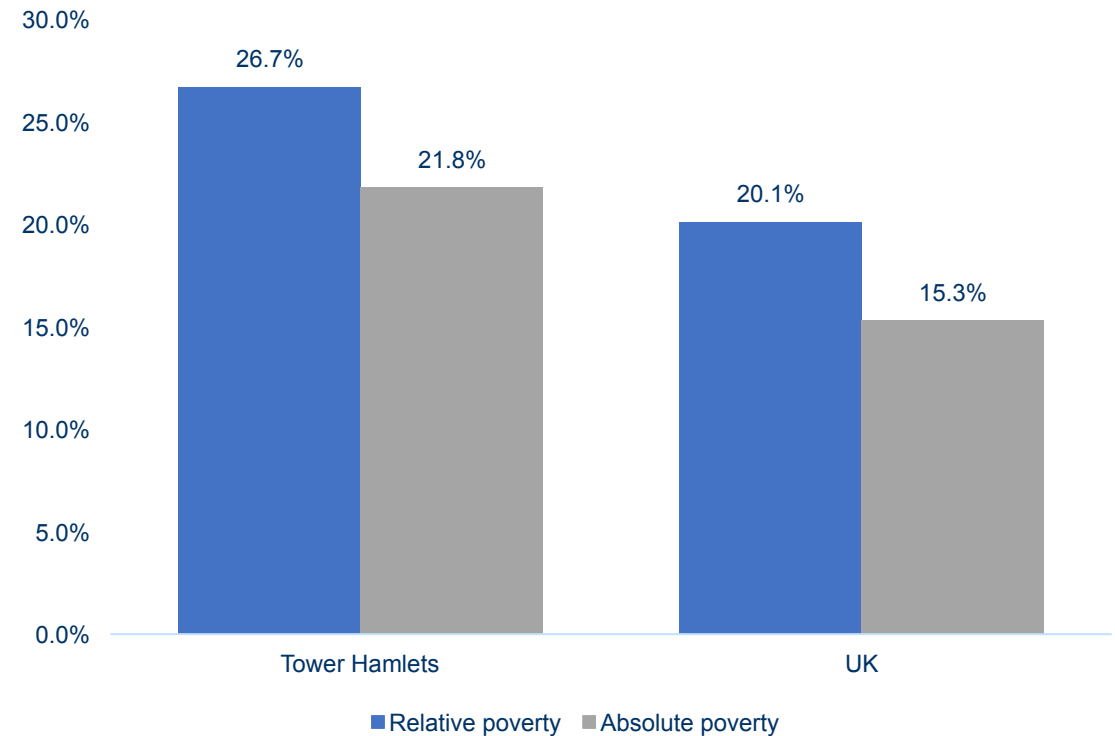


The borough had high level of children in low-income families in 2021-22



- 26.7% of children under 16 in the borough were in relative low-income families and 21.8% in absolute low-income families in 2021/22. Both were the second highest among the London boroughs and the City of London. The City of London had the highest proportion of both relative and absolute low-income families in the year.
- **Relative low income:** a family in low income Before Housing Costs (BHC) in the reference year. A family must have claimed Child Benefit and at least one other household benefit (Universal Credit, tax credits, or Housing Benefit) at any point in the year to be classed as low income in these statistics.
- **Absolute low income:** a family in low income Before Housing Costs (BHC) in the reference year in comparison with incomes in financial year ending 2011. A family must have claimed Child Benefit and at least one other household benefit (Universal Credit, tax credits, or Housing Benefit) at any point in the year to be classed as low income in these statistics.

Children in low income families - % of children in relative and absolute low income families, 2021-22



44% of older people live in income deprived households, the highest proportion in England

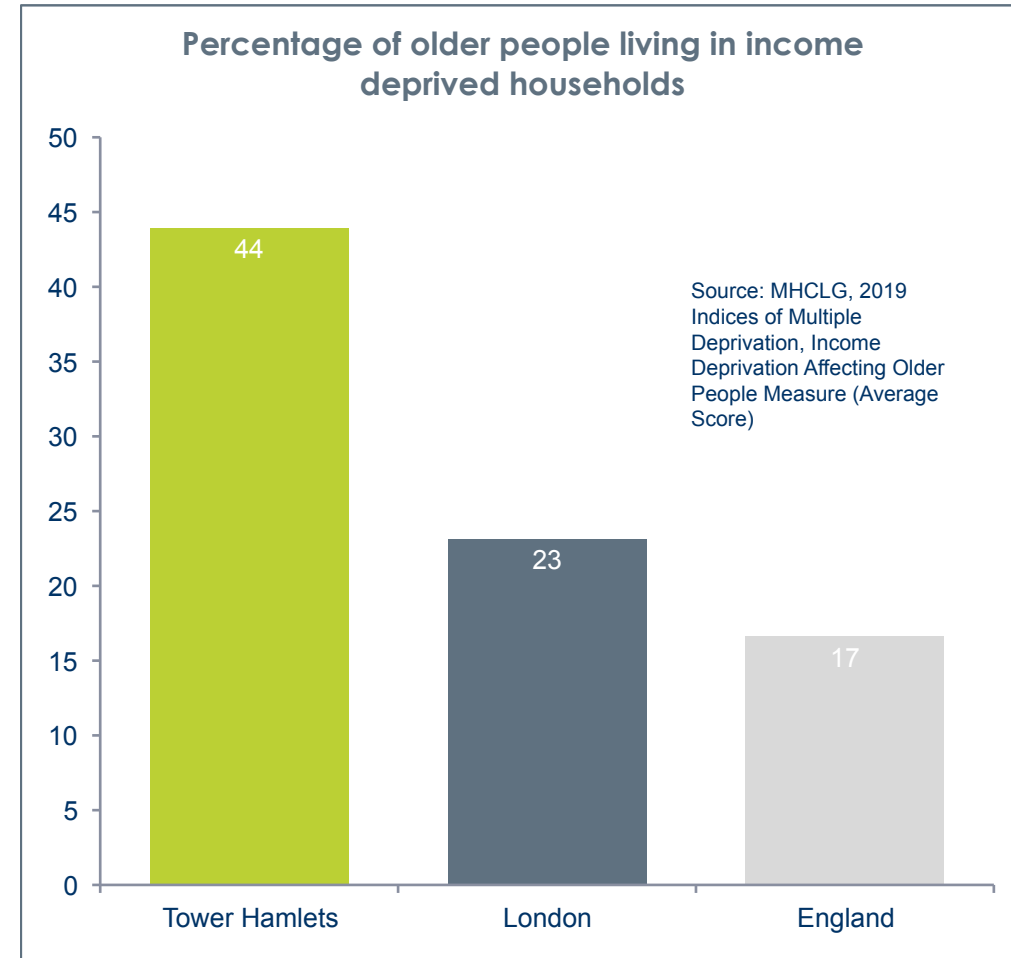


44% of older people live in income deprived households, the highest proportion in England and more than double the average.

This is the only area of the IMD with no change in relative level of deprivation.

Older people are particularly sensitive to **fuel poverty** – overall 11.2% of Tower Hamlets households are in fuel Poverty but for households of older people this is almost certainly higher.

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Cost of living and households: London and national data

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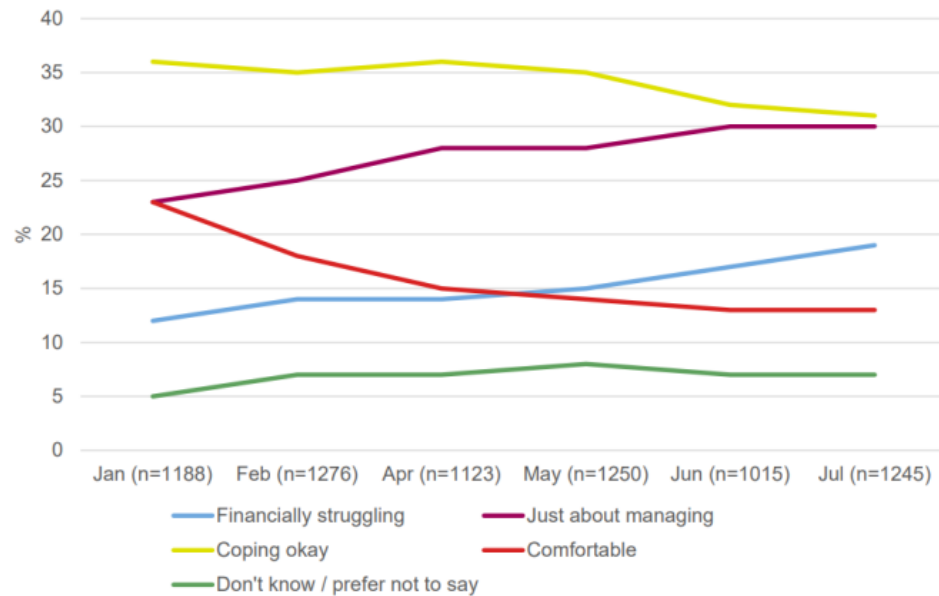
Cost of Living – London data



Survey on financial situations of Londoners by GLA, July 2022



Figure 1: Londoners' financial situation across 2022



Source: Polling by YouGov on behalf of GLA. Total sample size for each wave shown in brackets.

Source: "The cost of living – August 2022 update", City Intelligence, GLA, August 2022

- The survey carried out in July 2022 shows **19% are 'financially struggling'**, that is going without their basic needs and/or relying on debt or struggling to make ends meet. An increase of 6 percentage points compared to January.
- Among **social renters**, the proportion who are 'financially struggling' is now at a third (34%) up from a quarter in January (26%), and for **private renters** the proportion has increased from 16% to just over a quarter (27%).
- **Deaf and disabled Londoners** also continue to face a disproportionate impact, with a third (31%) saying they were 'financially struggling' in July, up 8 per centage points from January.
- Amongst **households with an income between £20,000 and £39,999** the proportion 'financially struggling' has increased from 14% in January to 26% in July.
- **Asian and Black Londoners** are also more likely to be impacted. In July 31% of Black Londoners and 24% of Asian Londoners are 'financially struggling'.



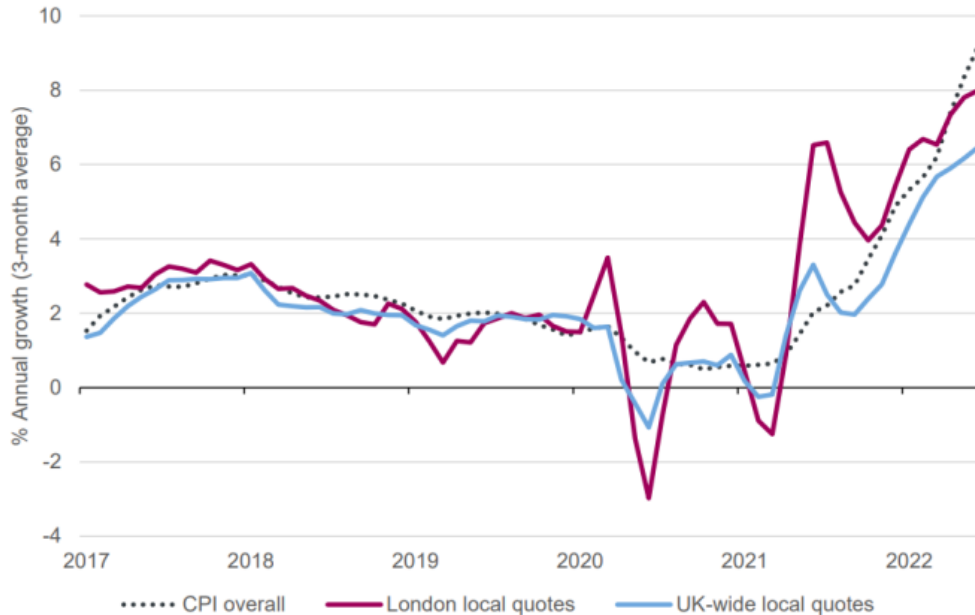
Rising inflation rate and declining real pay



- In June 2022, London's trimmed mean annual inflation rate of 8% was around 1.5 percentage points above the average for the UK

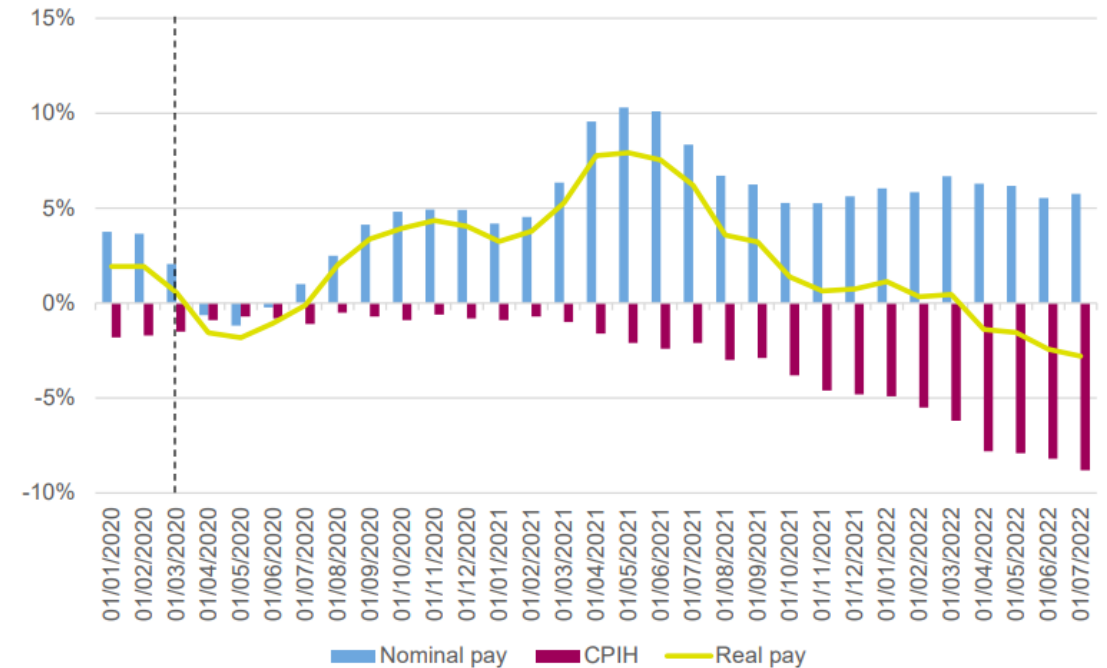
Figure 2: Measure of inflation pressures for London and the UK

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- The figure below shows real pay started declining

Decomposition of real median pay in London, % annual change
Effect from nominal pay change and CPIH inflation, to July 2022



Source: "The cost of living – August 2022 update", City Intelligence, GLA, August 2022

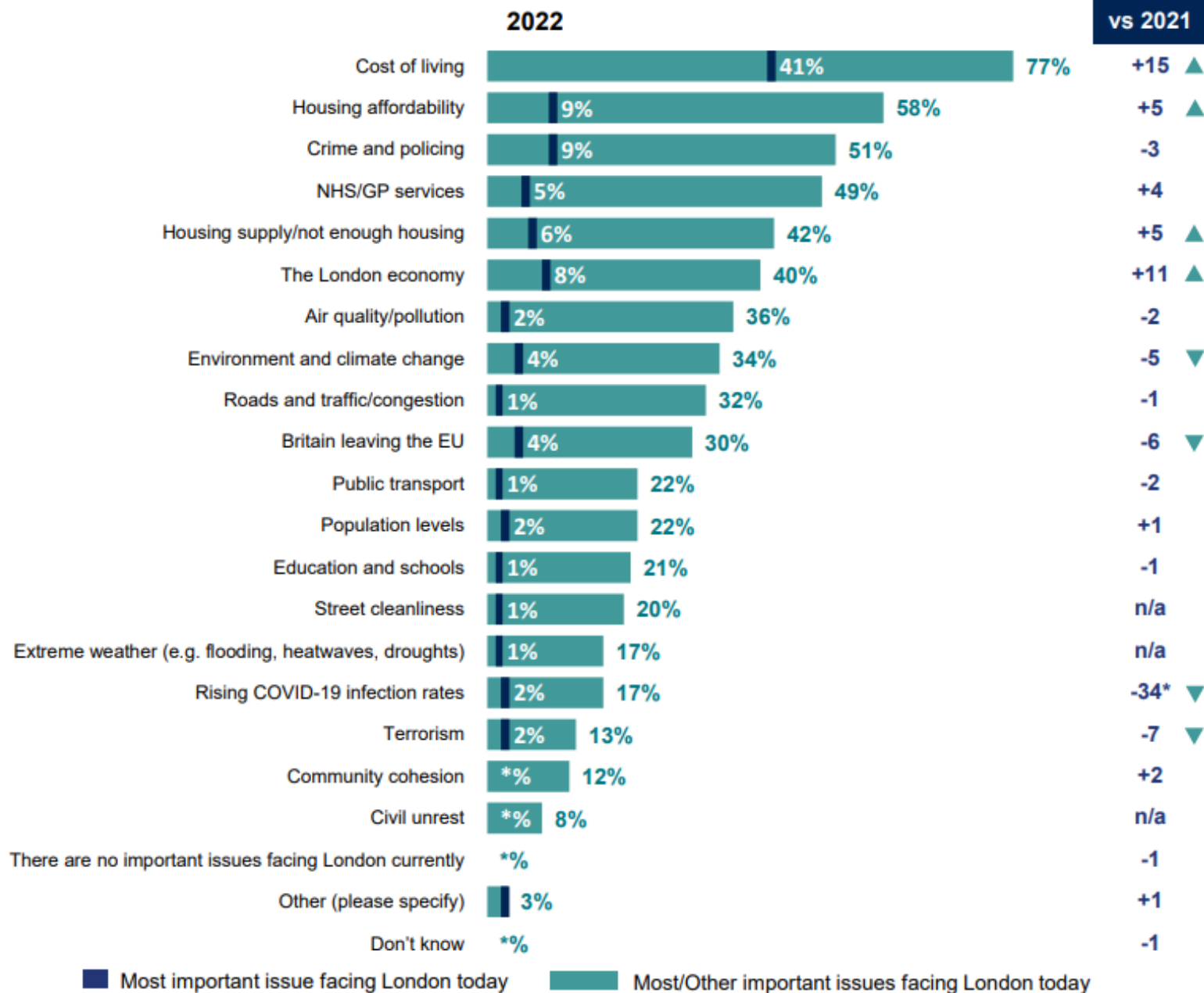


The rising cost of living is the top issue facing London, even more so than last year

Page 559

Q. What would you say is the most important issue facing London today?/

Q. And what do you see as other important issues facing London today?

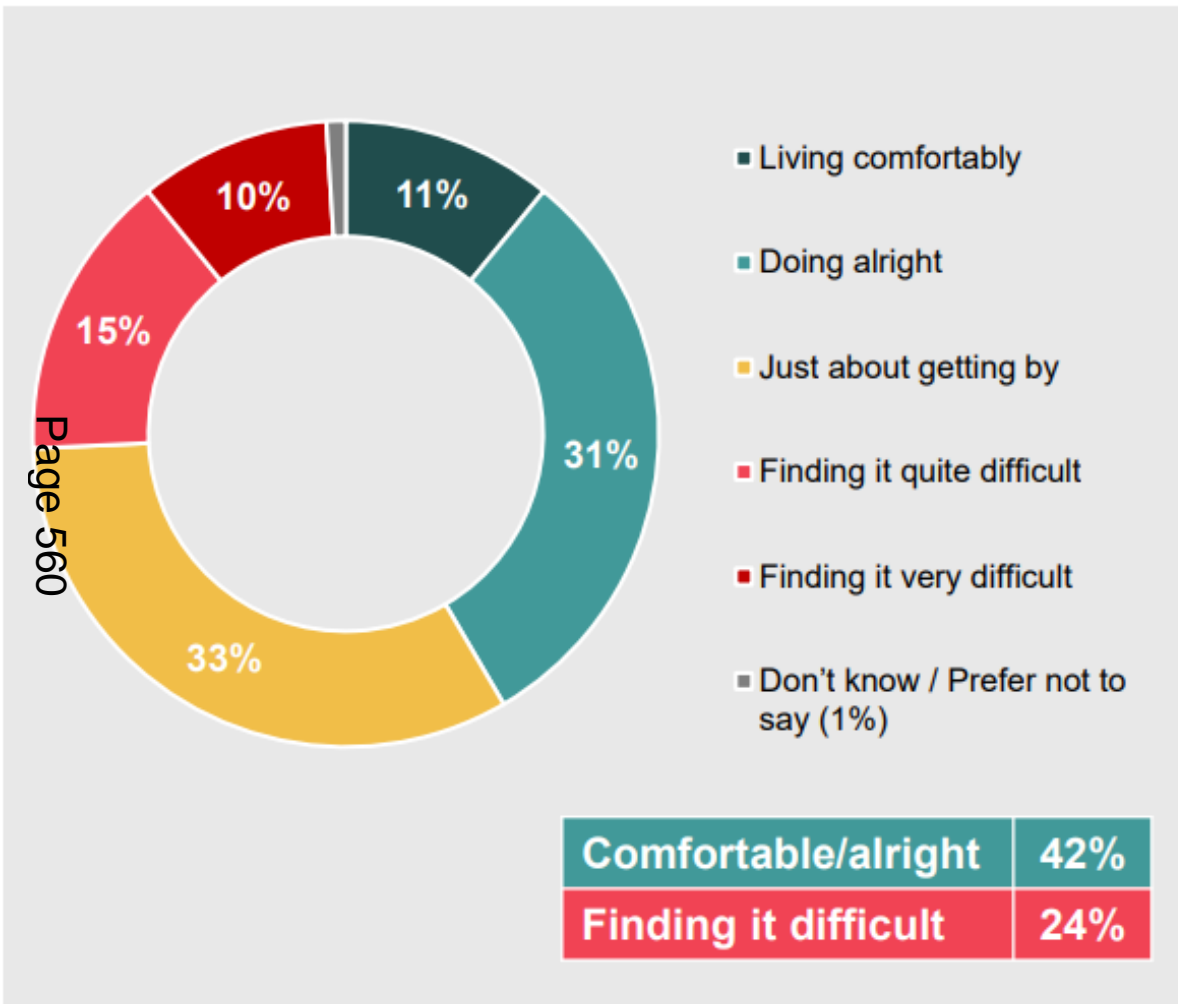


* Code was 'The COVID-19 pandemic' in 2021

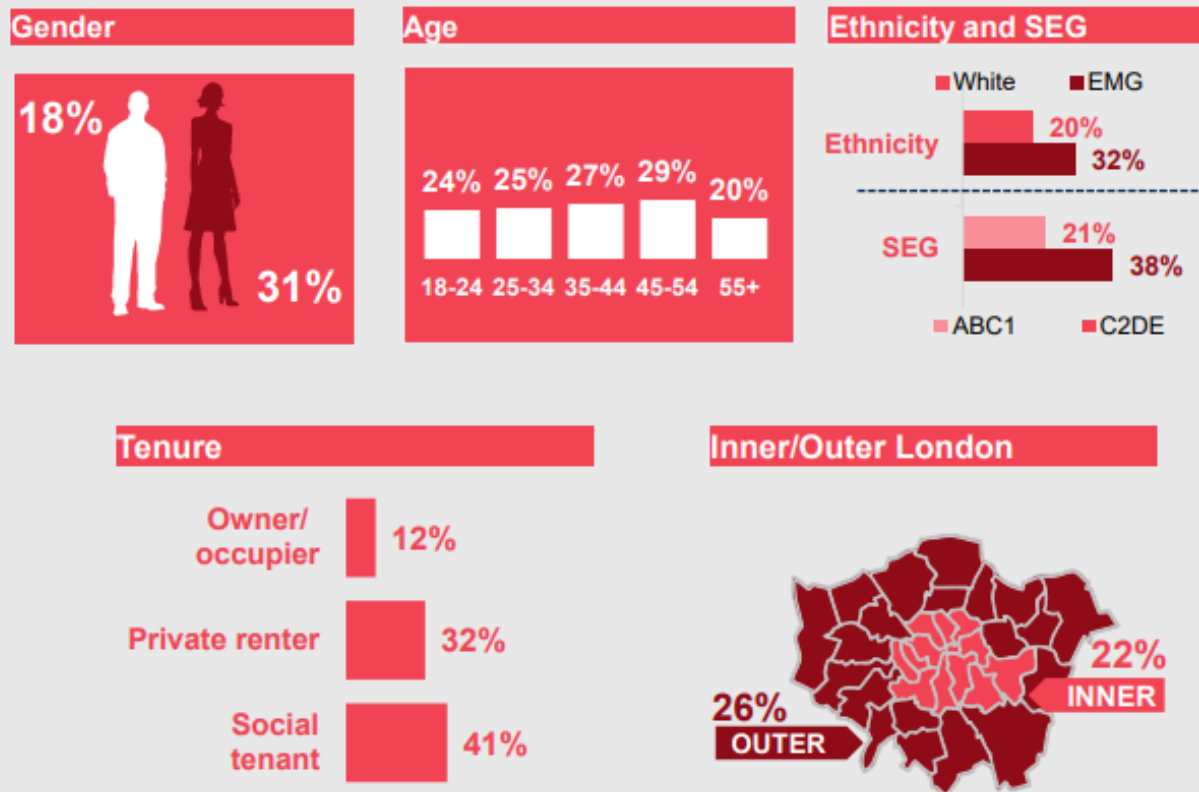
Base: All adults aged 18+ in Inner/Outer London (2022: 1021); Fieldwork dates 27th October - 9th November 2022; Source: Ipsos UK



Who is more likely to find it difficult to manage financially these days? Women, renters, those from minority ethnic backgrounds and in lower social grades in particular



Among the 24% who say they are finding it difficult to manage financially these days...



Q. How well would you say you are managing financially these days? Would you say you are...?

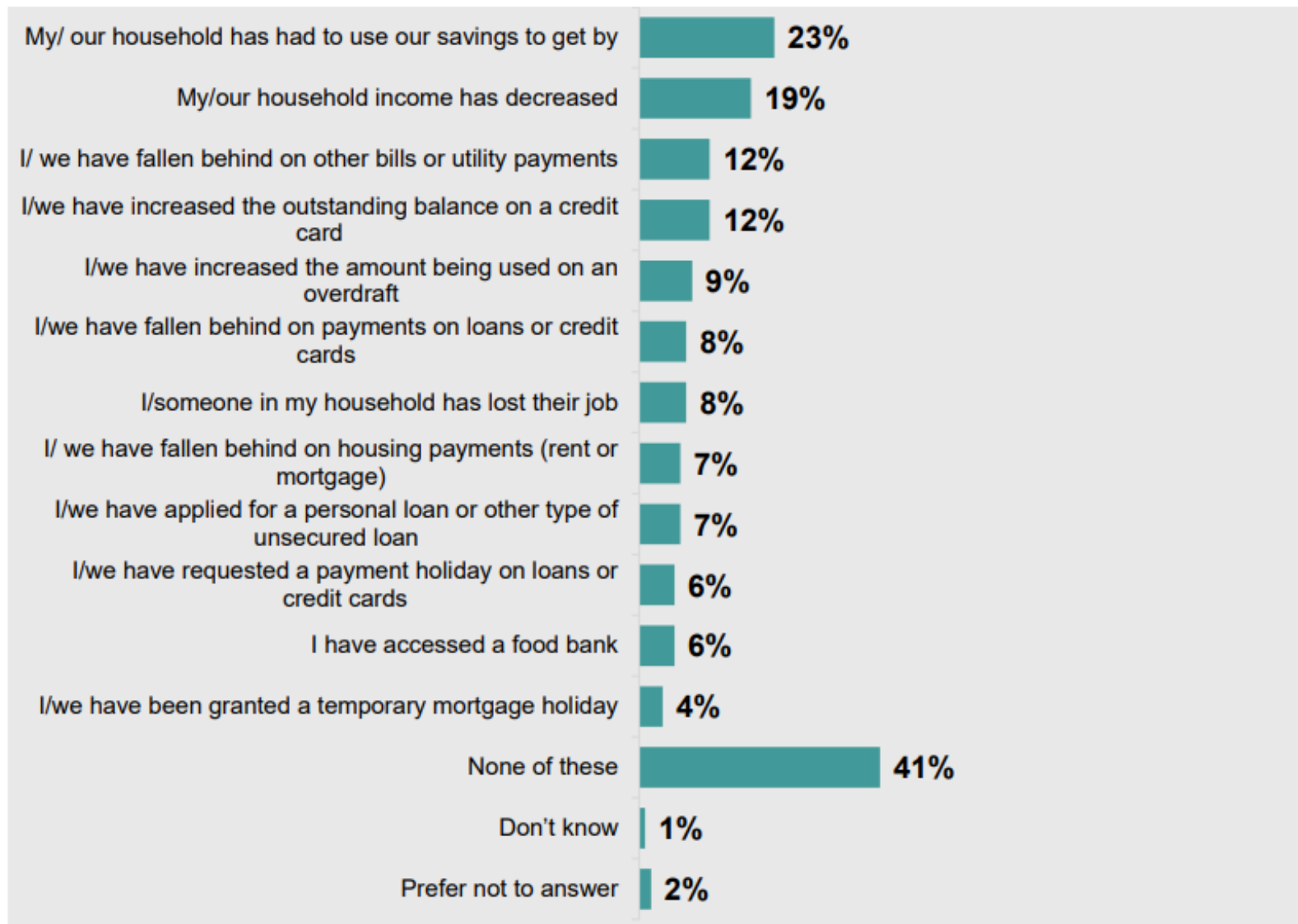
Base: All adults aged 18+ in Inner/Outer London (2022: 1021) : Fieldwork dates 27th October - 9th November 2022; Source: Ipsos UK

* New codes in 2022

One in four Londoners has had to use savings, and some have used credit or loans, to help with the rising cost of living

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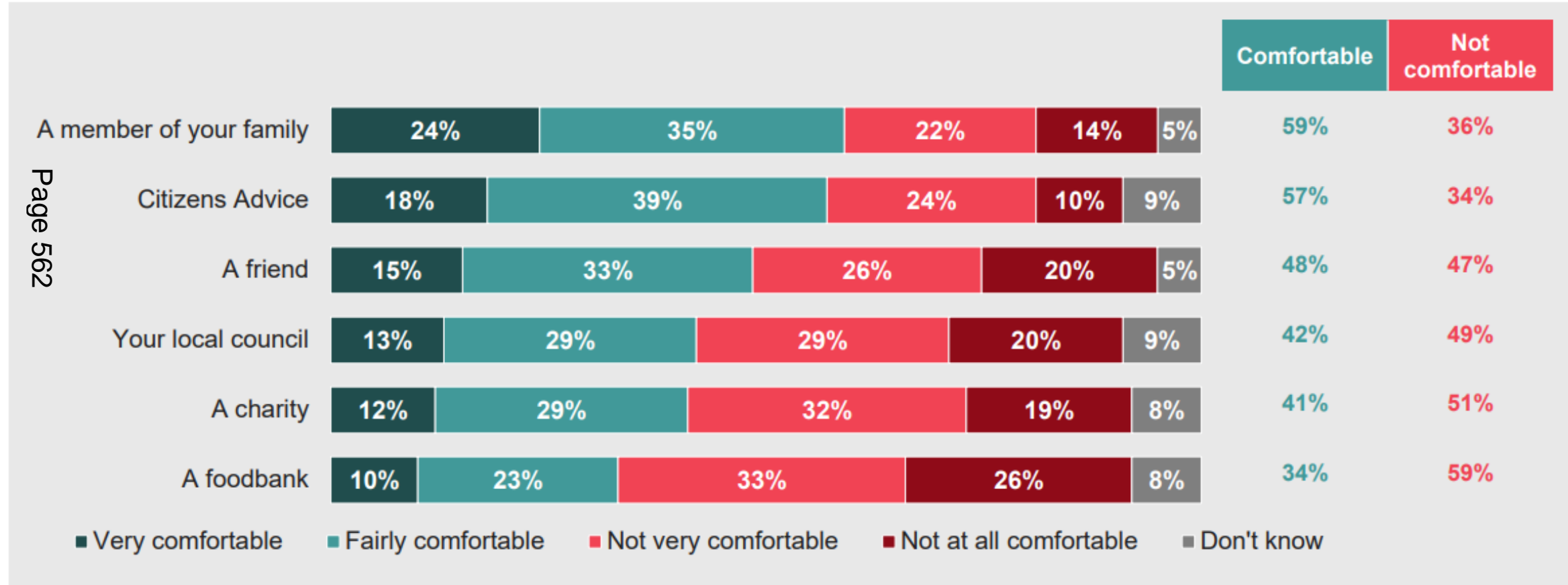
Q. Within the last 12 months, which, if any, of the following have you personally experienced, in response to rises in the cost of living?



Base: All adults aged 18+ in Inner/Outer London (2022:1021) : Fieldwork dates 27th October - 9th November 2022; Source: Ipsos UK

Most would feel comfortable asking family or Citizens Advice for support, but comparatively few are comfortable asking their local council (especially private renters)

Q. If you needed support or advice to help with the rising cost of living, how comfortable, if at all, do you think you would feel asking each of the following?



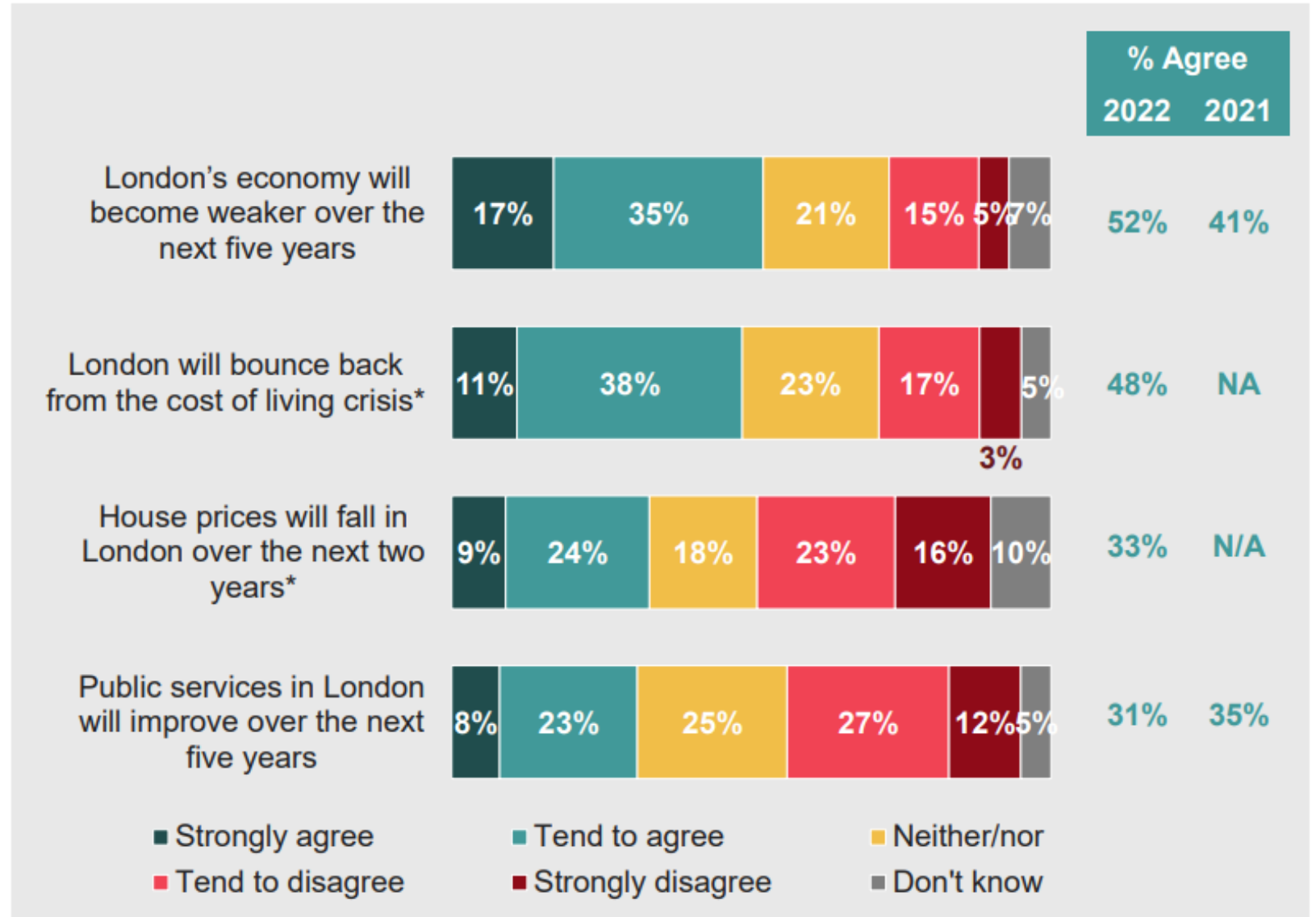
Base: All adults aged 18+ in Inner/Outer London (2022: 1021) : Fieldwork dates 27th October - 9th November 2022; Source: Ipsos UK

Londoners are bullish about the capital's ability to bounce back from the cost of living crisis, but less sure about the future of London's economy and public services

Page 5/33

Q. To what extent do you agree or disagree with each of the following statements?

Base: All adults aged 18+ in Inner/Outer London (2022: 1021) : Fieldwork dates 27th October - 9th November 2022
Source: Ipsos



Institute of Customer Service UK Customer Satisfaction Index, Jan 2023 (data collection 5 Sept-3 Oct 2022) The state of customer satisfaction in the UK



Changing attitudes and behaviours about spending and personal debt

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UKCSI Jan 2023 | Automotive



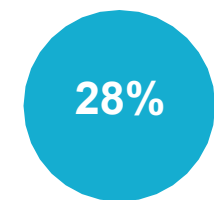
As the cost of living rises, financial well-being is complex and polarised

How would you describe your financial well-being ?

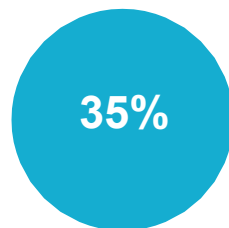


Changing behaviours

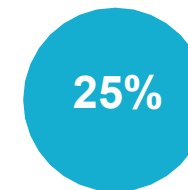
Page 566



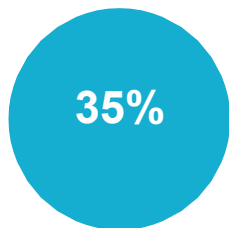
I've thought more carefully about what I spend on



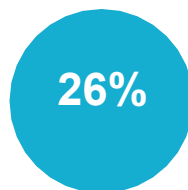
I've sold items to generate income



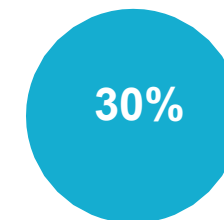
I've used buy now pay later services



% of customers who prefer excellent service, even if it costs more



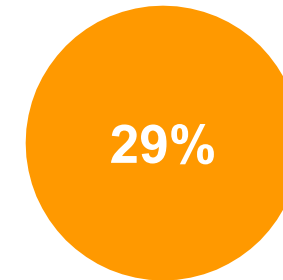
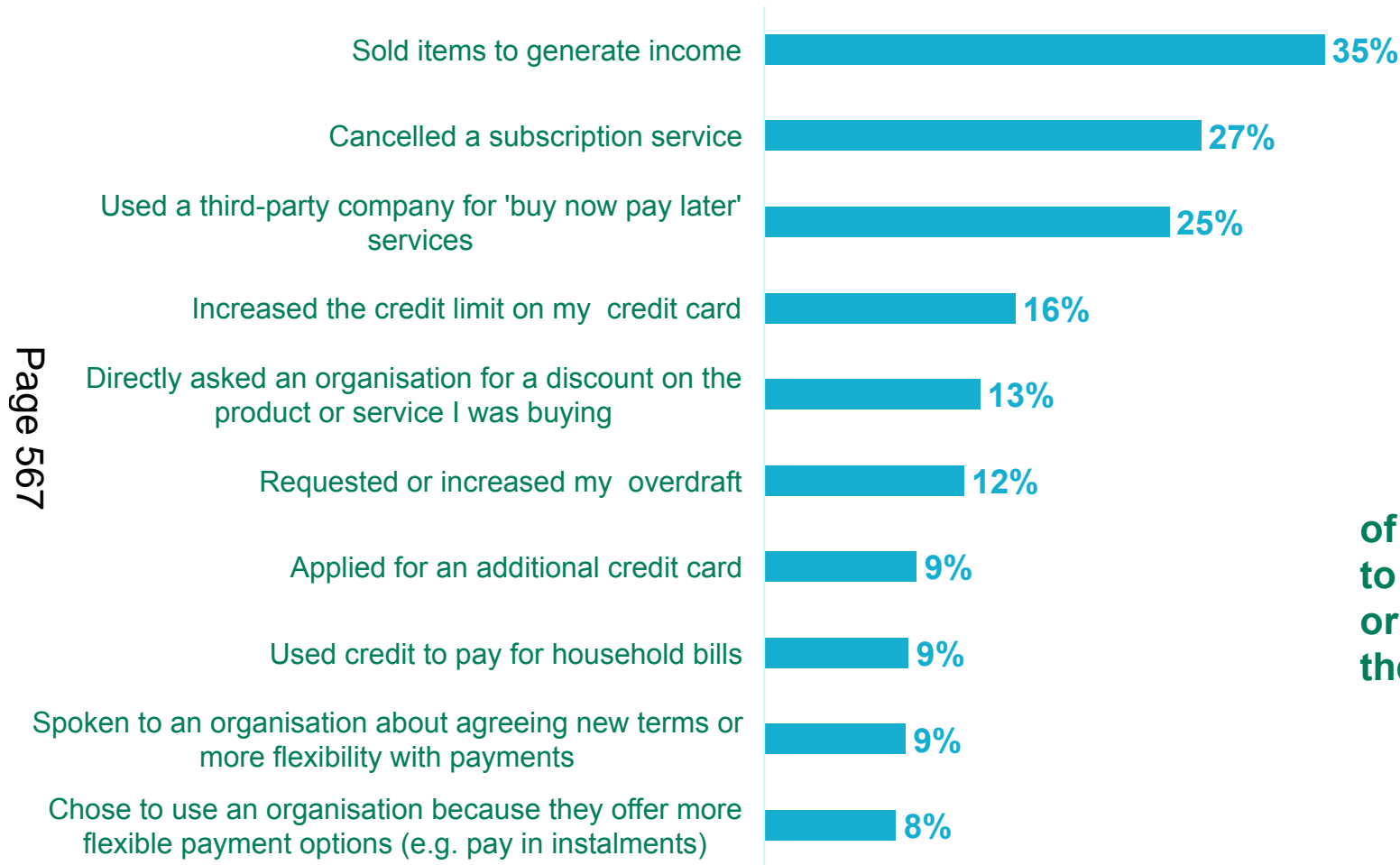
Believe their personal debt will increase in the next 6 months



Hold no personal debt

Changing attitudes and behaviours about spending as well as personal debt

Changes in customer behaviour in response to the cost of living crisis:
have you done any of the following in the last 6 months ?



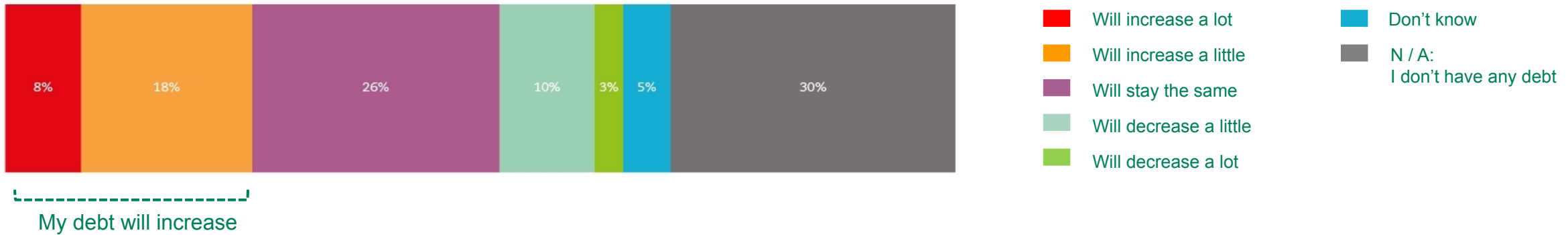
of customers have increased their access to credit either by requesting an overdraft, or applying for a credit card, or increasing their credit limit

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An additional survey of 1,001 customers conducted alongside the UKCSI to further assess attitudes and behaviours concerned with spending and personal debt

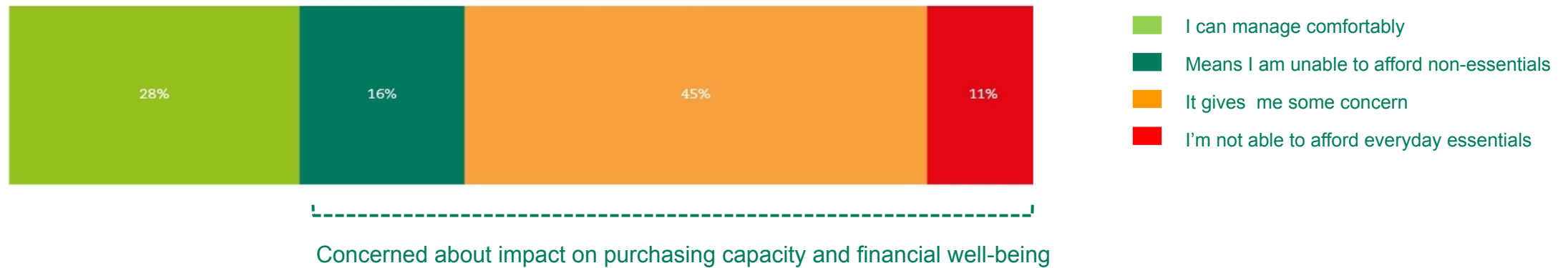
UKCSI Jan 2023 | Automotive

26% of customers believe their personal debt will increase in the next 6 months



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Amongst customers who believe their level of debt will increase in the next 6 months, 72% are concerned about the impact on their purchasing capacity and financial well-being



Office for National Statistics Cost of living latest insight February 2023

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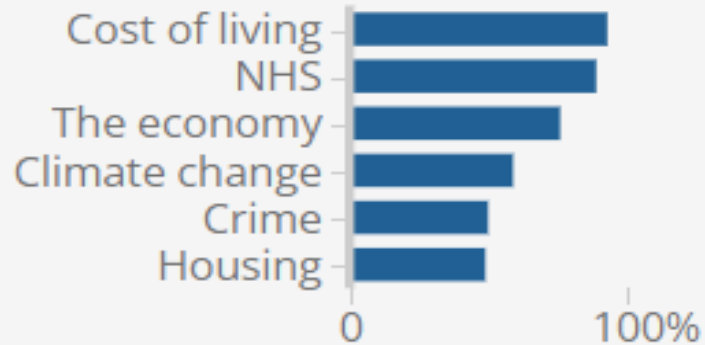


Cost of Living impact on the UK



Cost of living reported as an important issue facing UK today

Adults in Great Britain, 11 to 22 January 2023



Office for National Statistics

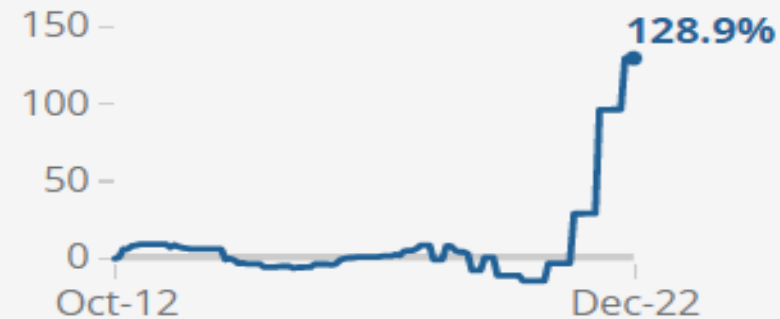
According to the ONS more than 9 in 10 adults 93% of Great Britain reported the cost of living as an important issue facing the UK.



Cost of living: effects of inflation on energy cost and food

Gas prices rose 128.9% in the year to December 2022

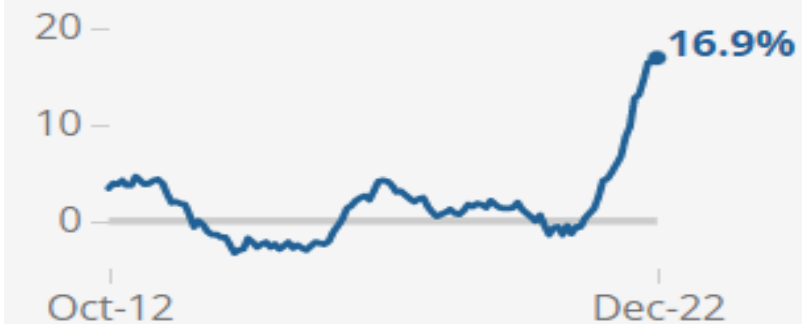
Gas annual CPIH inflation rates, UK



Office for National Statistics

Inflation rate for food and non-alcoholic beverages rises for 17th consecutive month

Food and non-alcoholic beverages annual CPIH inflation rates, UK



Office for National Statistics

The annual inflation rate has been rising since February 2021. Inflation prices in recent months have been driven by higher food and energy prices.



Resolution Foundation

New budget, same problems: spring budget preview, 6 March 2023

Household finances forecasts



Summary: the forecasts

There is finally some good news for the Chancellor in the short term:

- Wholesale energy prices are down 80 per cent since the summer.
- This means the 2023 outlook is much improved, with GDP fall for 2023 likely to be less than half that feared in the Autumn and;
- Borrowing looks set to come in around £30bn lower than expected in 2022-23.

The next year is unlikely to feel like good news for households:

- Typical household incomes are set to fall by 4 per cent (or £1,100) in 2023-24.
- That includes tax rises of £650 for a typical household from April (£1,500 for the richest fifth).

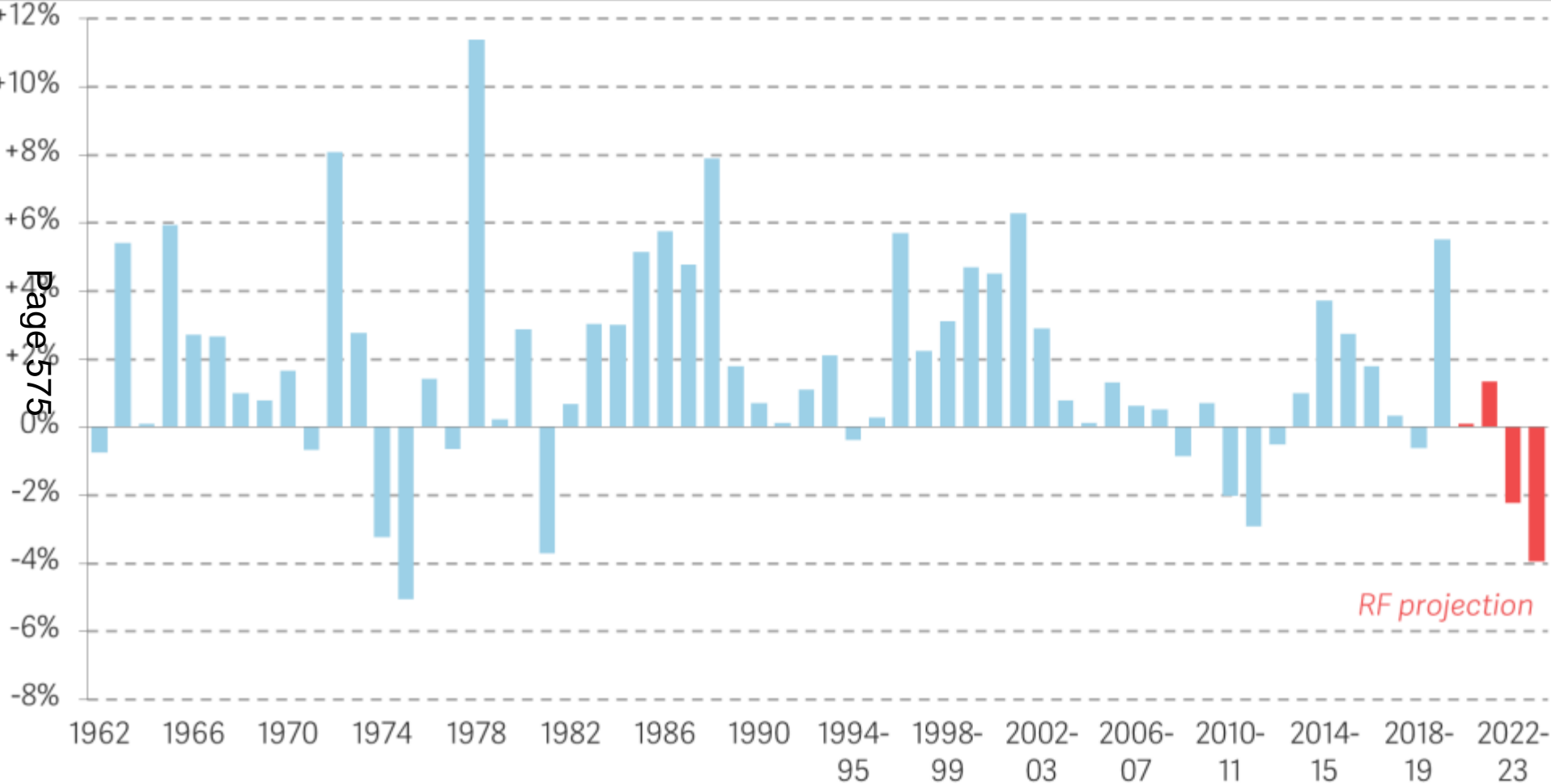
Looking ahead, the low growth and elevated debt big picture may not change hugely:

- Key judgement for the Office for Budget Responsibility (OBR) is whether it becomes as pessimistic as the Bank of England (BoE) on labour market participation, which could offset benefits of smaller recession.
- If stronger tax receipts this year are forecast to last that could mean somewhat lower borrowing (~£10bn/year).
- Medium-term public finances would be little changed, with higher debt than expected a year ago and only around £15bn of headroom against the Chancellor's target of debt falling in 5 years' time.

Household finances:
it won't feel like good news

Despite good news on energy, incomes will fall further

Real growth in median equivalised household disposable income for non-pensioners, after housing costs: GB/UK

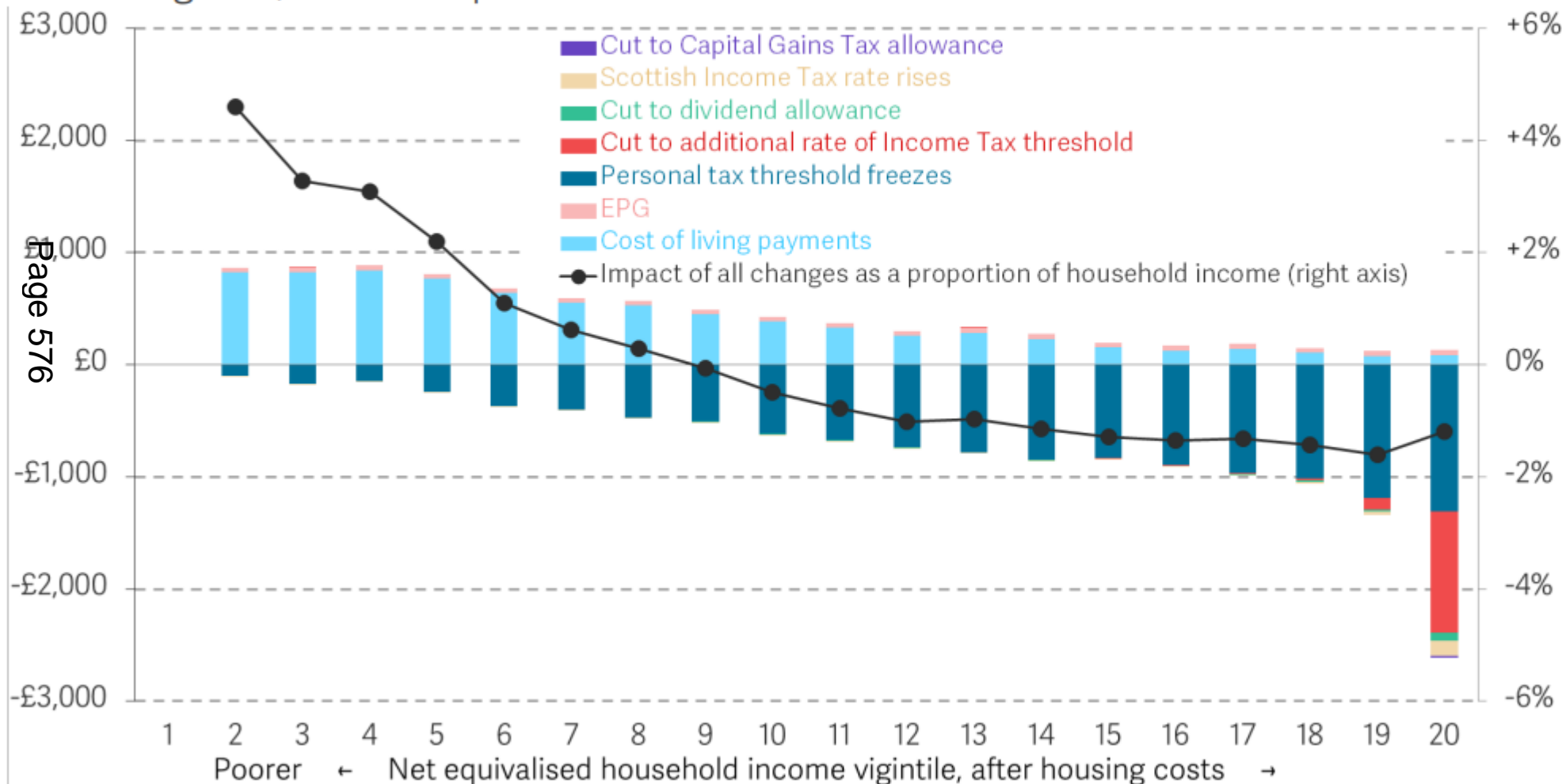


Typical non-pensioner income is projected to fall by 2% (£700) in 2022-23 and a further 4% (£1,100) in 2023-24

Notes: GB from 1994-95 to 2001-02.
Source: RF analysis of DWP & IFS, Households Below Average Income; RF projection including use of the IPPR Tax Benefit Model, OBR and Bank forecasts.

Policy is supporting poorer, and taxing richer, households...

Average impact of tax changes taking effect in April 2023 and cost of living support in 2023-24 by income vigintile, in 2023-24 prices: UK

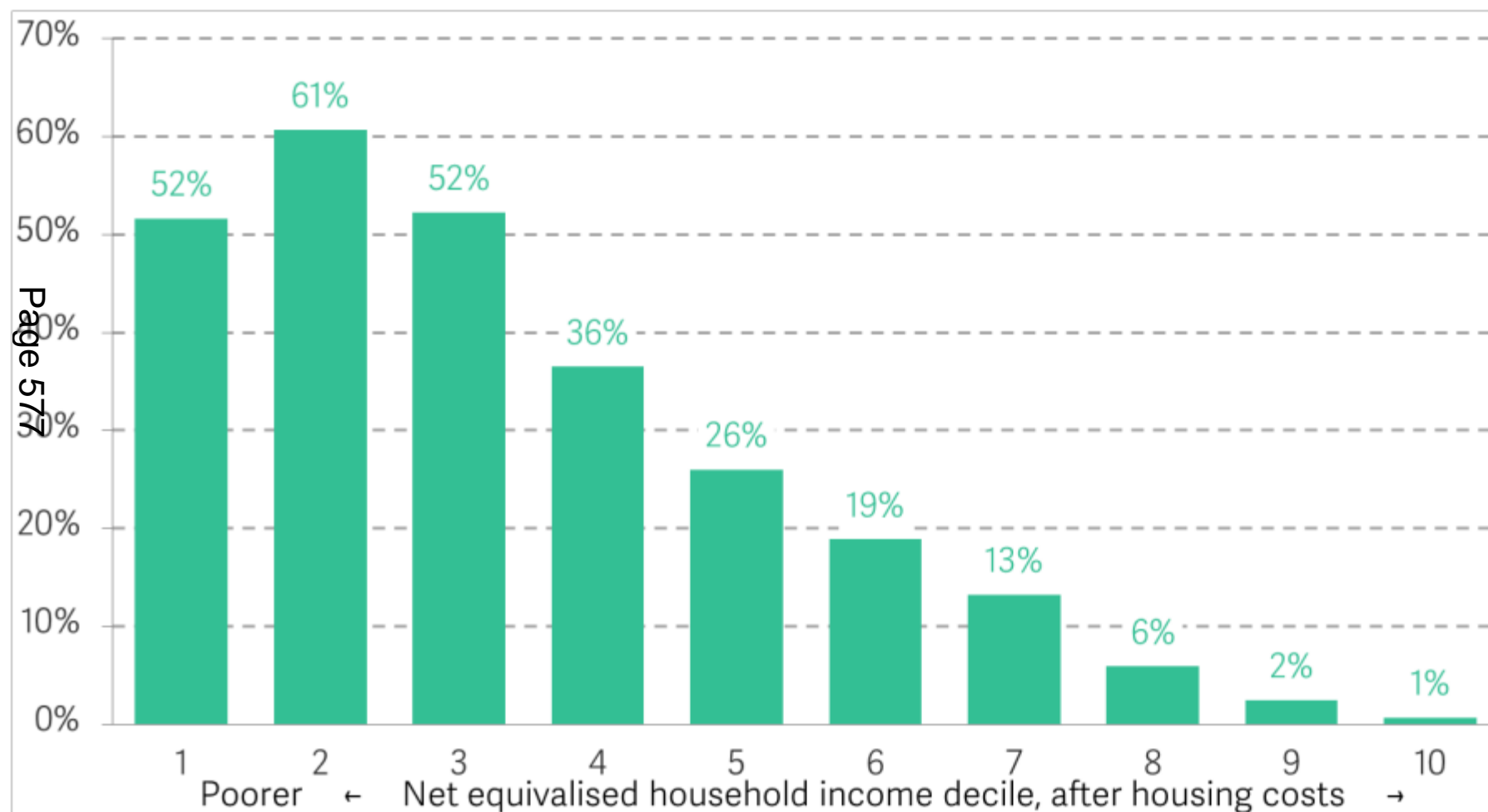


Tax rises coming into effect in April mean a £650 hit to a typical household's income and a £1,500 hit for the richest fifth of households.

Notes: Capital Gains Tax change reduces the annual exempt amount from £12,300 to £6,000 from 2023-24. We assume Capital Gains Tax changes affect the top vigintile only. Dividend allowance change reduces the threshold from £2,000 to £1,000 in 2023-24. Additional rate of Income Tax threshold reduced from £150,000 to £125,140 in 2023-24. Personal tax threshold freezes refers to 2023's Income Tax and National Insurance freeze (excluding employer NI). Scottish Income Tax rates are rising by 1p for higher and additional rate payers. We do not include changes in Council Tax.
Source: RF analysis of DWP, Family Resources Survey using IPPR tax-benefit model; DWP, Households Below Average Income.

...but not all poorer households will get cost of living payments

Estimated proportion of households in receipt of means-tested benefits, by household income decile, 2022-23: UK



Non-take-up of benefits is the main reason why many low-income households are not in receipt of benefits (1.5 million in bottom two deciles), alongside non-entitlement for low-earners (0.5m) and students and those with high savings (0.5m).

Notes: Chart shows proportion of households that have a least one family member in receipt of a means-tested benefit such as Universal Credit (or legacy equivalent except Housing Benefit).

Source: RF analysis of IPPR Tax-Benefit Model; DWP, Households Below Average Income.

Digital inclusion – national research findings

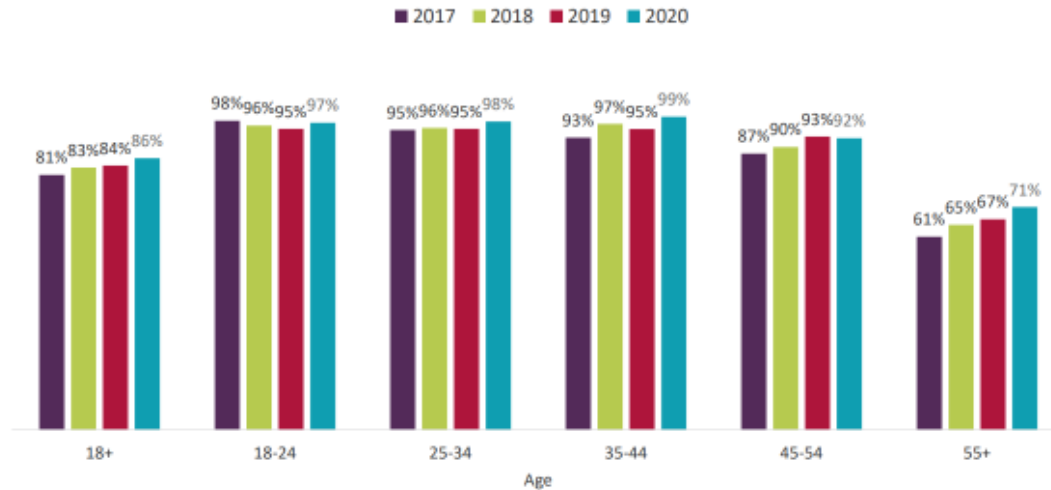
Page 578



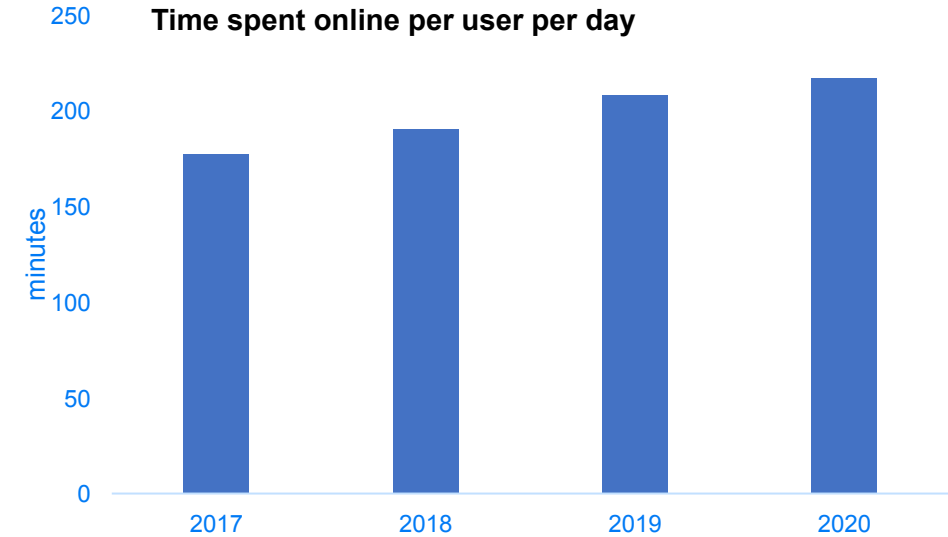
Internet use in the UK – Online Nation 2021 report, Ofcom



Online access by UK adults in September each year, by age



Time spent online per user per day



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- 94% of UK households had internet access in 2021
- 92% of UK households had fixed broadband in 2021
- 86% of UK adults used the Internet in September 2021
- 85% of internet users aged 16+ used a smartphone to go online in 2020.



Characteristics of people facing digital exclusion



Limited digital users:

- Limited users are **10 times more likely to be over-65 years old** than extensive users.
- Limited users are **4 times more likely to be from low income households** than extensive users.
- Limited users are **8 times less likely to have a post-18 education** than extensive users.

Source: Yates, S (2022), Types of UK internet users, Prof. Simeon Yates' analysis of Ofcom data on internet use by adults (analysis for Good Things Foundation) [Digital Nation 2022 Sources - Good Things Foundation](#)

Those say 'the internet is not for me':

- Those who **left education at or under 16 years** are 2.8 times more likely to be non-users saying 'it's not for me' than those who left education after 21
- **Each child in the house makes you 1.7 times less likely to be a non-user** saying 'it's not for me'
- **Those who are not "very" confident about their literacy** are 2.4 times more likely to be nonusers saying 'it's not for me'
- **Those in NRS social grades D & E** are 3.2 times more likely to be non-users saying 'it's not for me' than those in social grades A & B.

Source: Understanding the motivations of non-users of the internet. Good Things Foundation and BT [understanding_motivations_of_non-users_of_the_internet.pdf \(goodthingsfoundation.org\)](#)



Residents Survey – Mid pandemic residents survey in 2021

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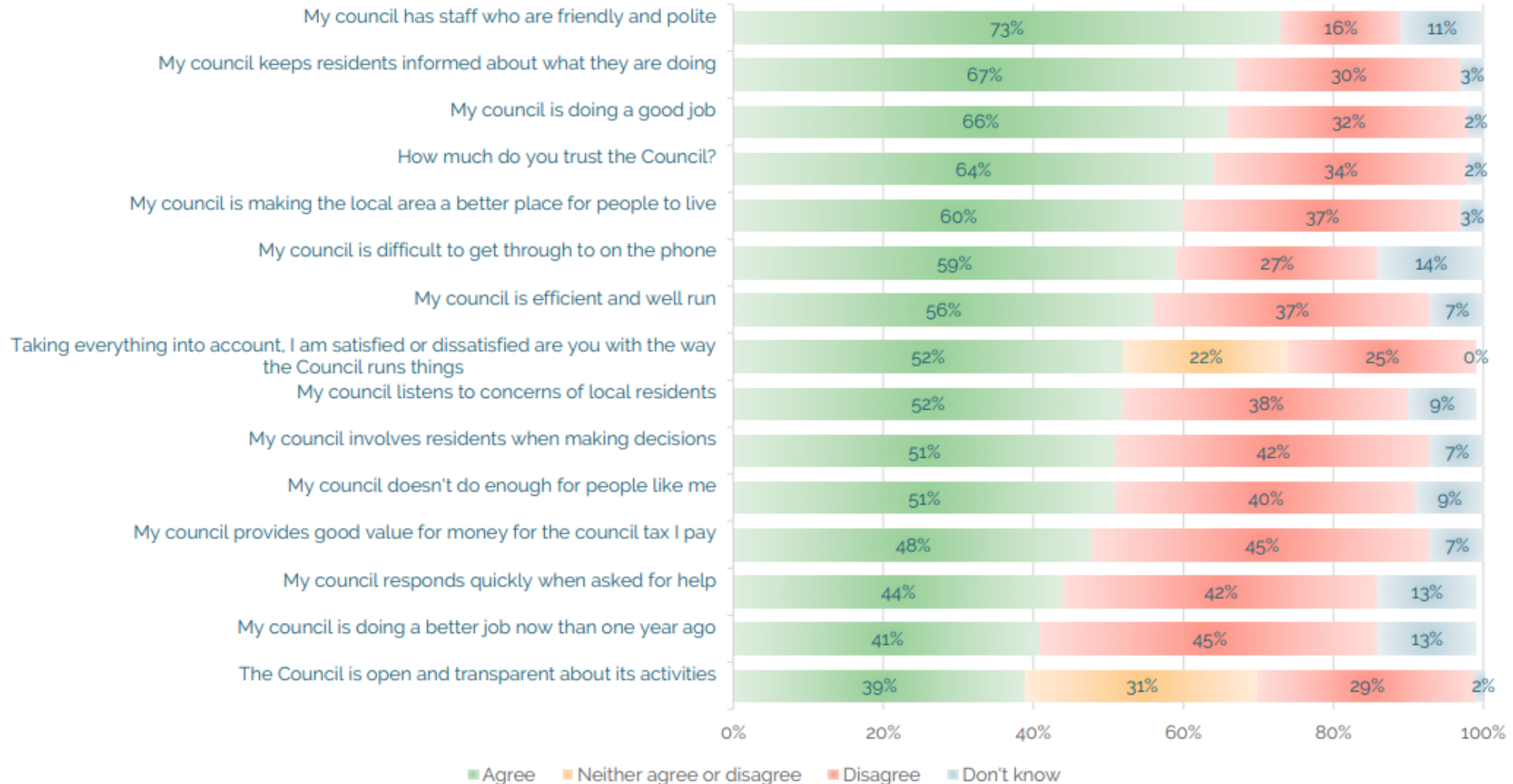


Mid Pandemic Residents Survey 2021



- The purpose of the mid pandemic residents' survey was to give the council a snapshot of the pandemic impact and help us plan for the future together.
- Because of the differences in methodology and the context in which the survey took place, results should not be compared directly to our normal Annual Residents Survey (ARS). The last normal ARS was carried out in 2019.
- In 2020, we had to cancel our survey as England went into the first pandemic lockdown.
- The next ARS will be conducted in spring 2023.



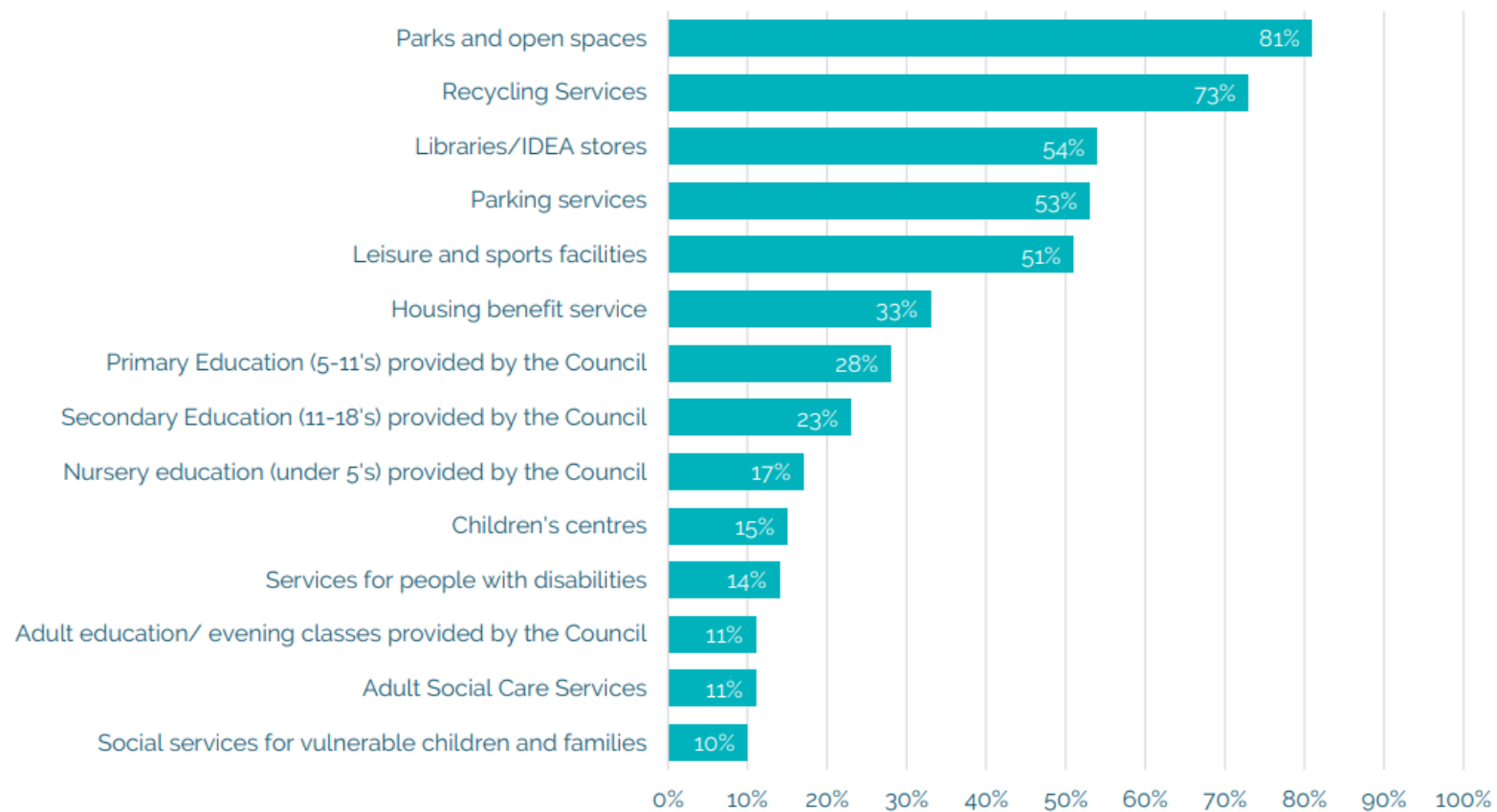


Note: Results may not add up to 100% as each percentage was rounded to the nearest integer. Questions are answered in a 4-points response scale: 1) a great deal, 2) to some extent, 3) not very much, 4) not at all. The first 2 response options were merged into "agree" and the last 2 into "disagree". Exceptions are "Satisfaction with how the Council runs things" and "The council is open and transparent", which include a middle point in the response scale.

Which of these services provided locally do you or members of your household use nowadays?

Mid pandemic residents' survey 2021

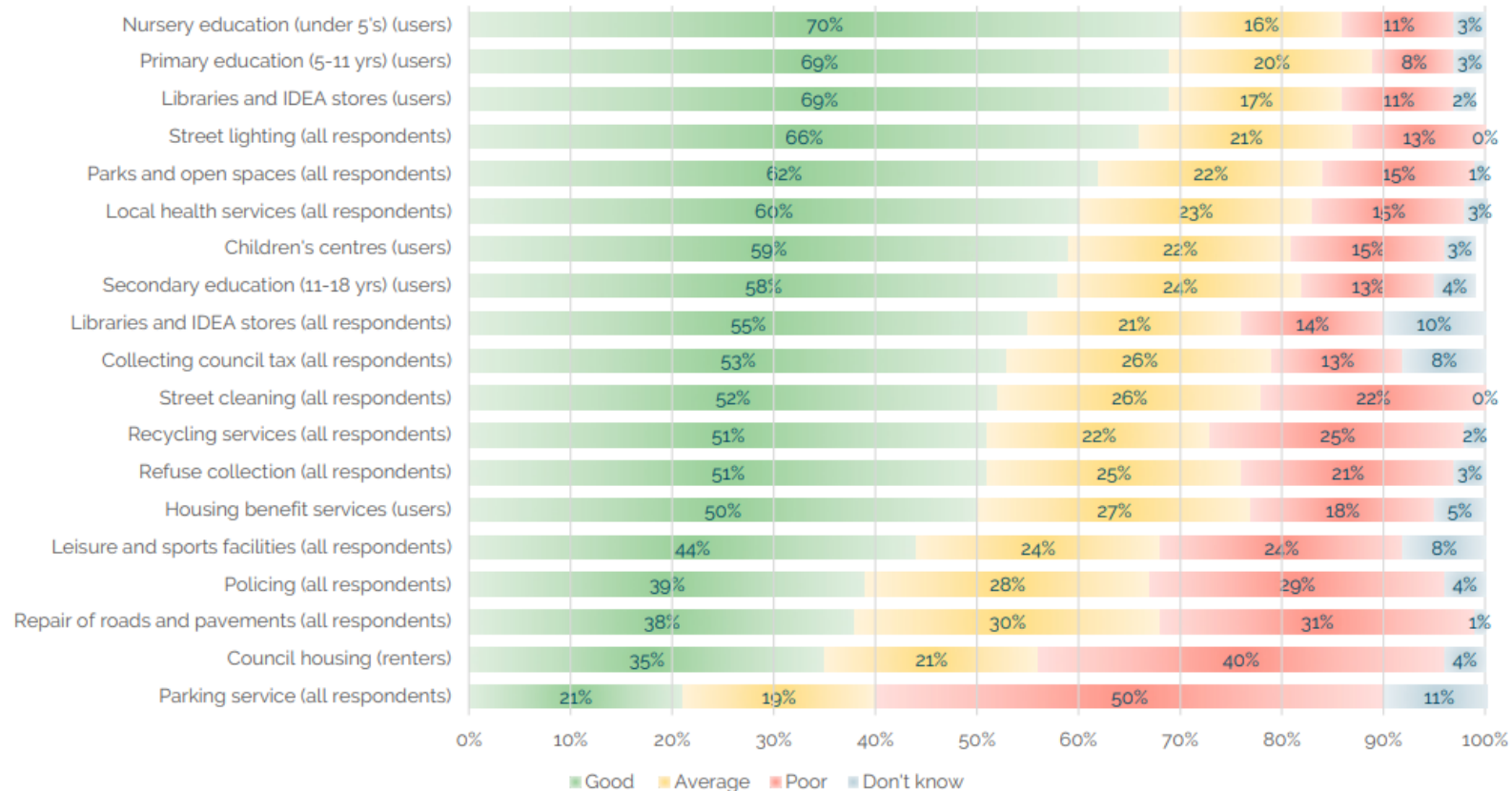
Use of services



Respondents were asked about their opinion on the quality of different services, from extremely poor (1) to excellent (7)

Mid pandemic residents' survey 2021

Opinion of services



Note: Results may not add up to 100% as each percentage was rounded to the nearest integer. Questions are answered in a 7-points response scale: 1) excellent, 2) very good, 3) good, 4) average, 5) poor, 6) very poor, 7) extremely poor. The first 3 response options were merged into "good" and the last 3 into "poor".

Mid pandemic residents' survey 2021

Access to the internet

95%

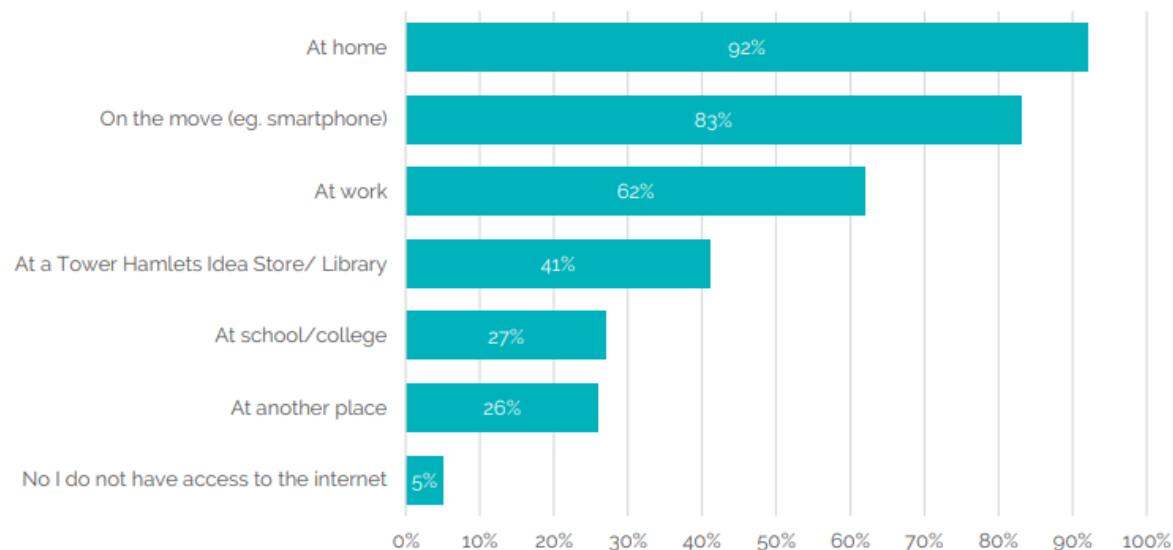
Access to the internet at home

92%

Use of email

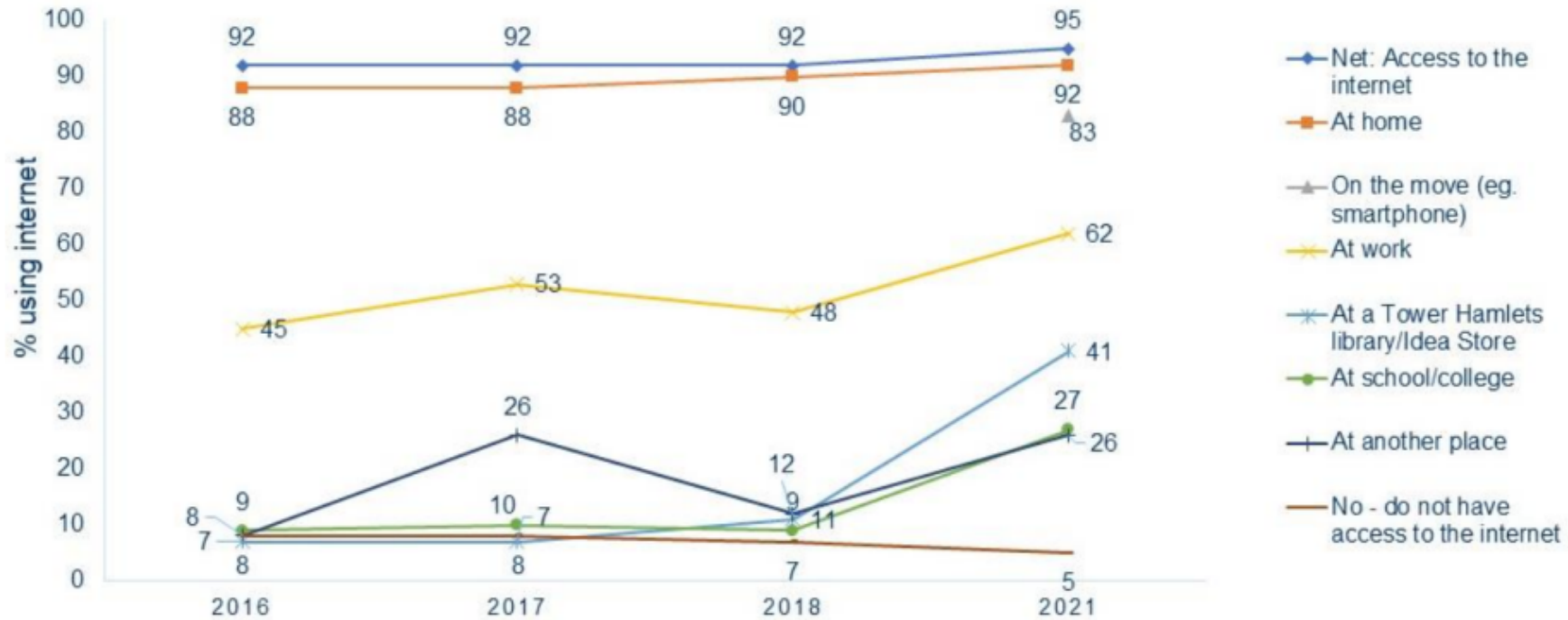
94%

Sense of belonging – use of internet



What do you use the internet for?	%
Emails	94%
Browsing for information about goods and services	92%
Internet banking	86%
Telephoning or making video calls over the internet (eg. Skype)	85%
Buying or selling goods and services online	81%
Online news, newspapers or magazines	79%
Playing or downloading games, films or music	74%

Tower Hamlets residents' internet access, Annual Residents Survey 2016-2021



Source: Tower Hamlets Annual Residents' Survey, 2016 to 2021. Q15 Do you have access to the internet...?
Base: All respondents (2021: 1108)



Tower Hamlets New Residents Survey 2021



Aims and objectives



- The aims at the outset of the project were to understand:
 - Current and future demand for services such as education and health provision
 - Migration trends, including intentions to stay in or move out of the borough
 - Demographic characteristics of residents who have moved into the new housing developments
 - Household composition and household size of occupants
 - How different the overall population characteristics of new residents are compared to the 2011 census baselines



Background



- **Demographic changes**

- There has been a significant change in the borough's demographics since 2011
- Tower Hamlets has one of the fastest growing populations in the UK
- This is expected to continue over the next 15 years



- **Data shortage around new residents**

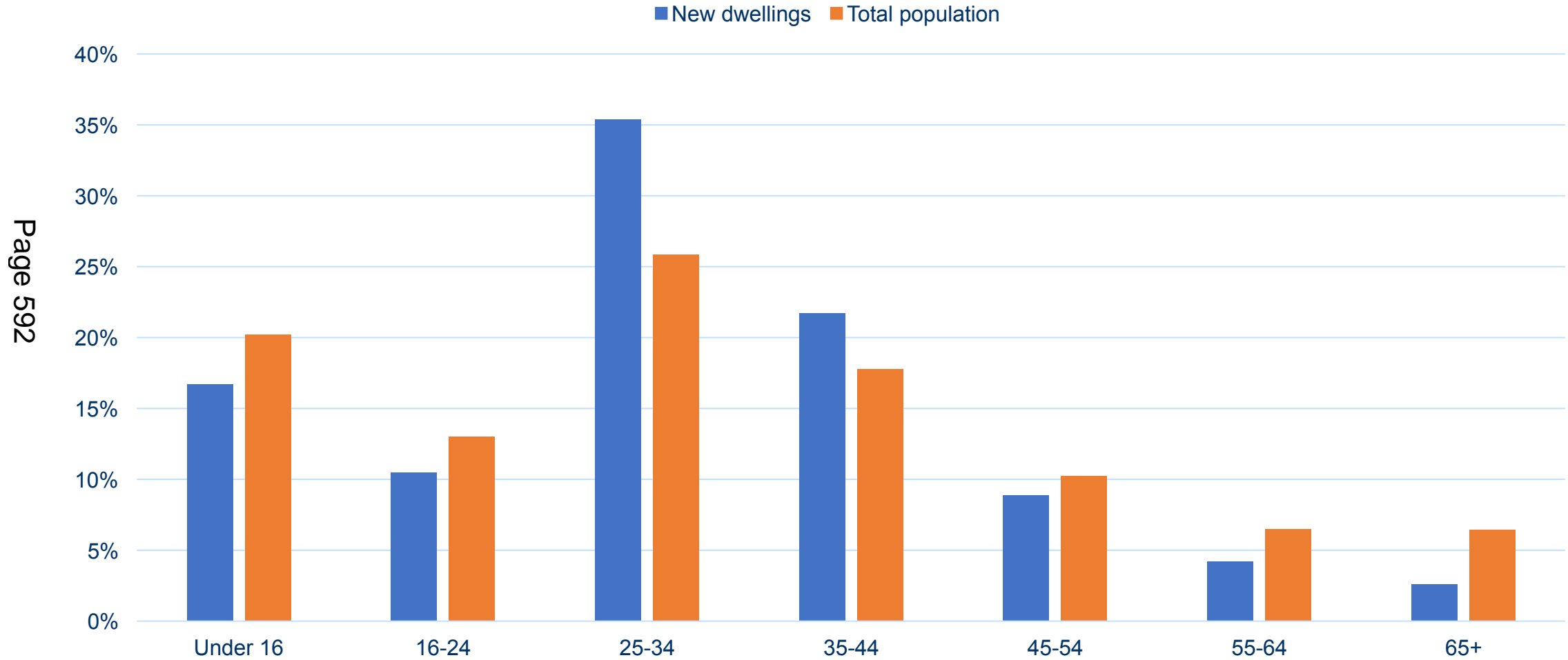
- There is limited data on the borough's new residents
- Their infrastructure needs may differ from the established population
- Understanding the demographic characteristics and infrastructure preferences / needs of the new residents will help Tower Hamlets provide better services



New residents and population change



Age of Residents



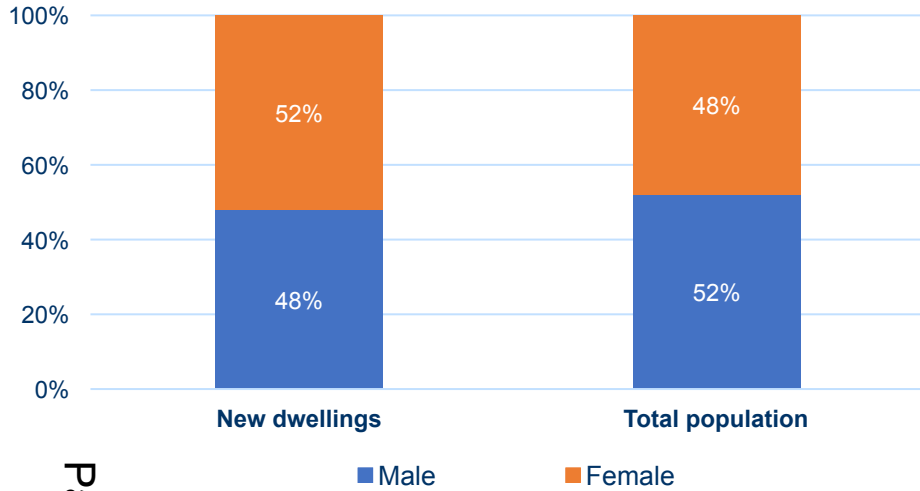
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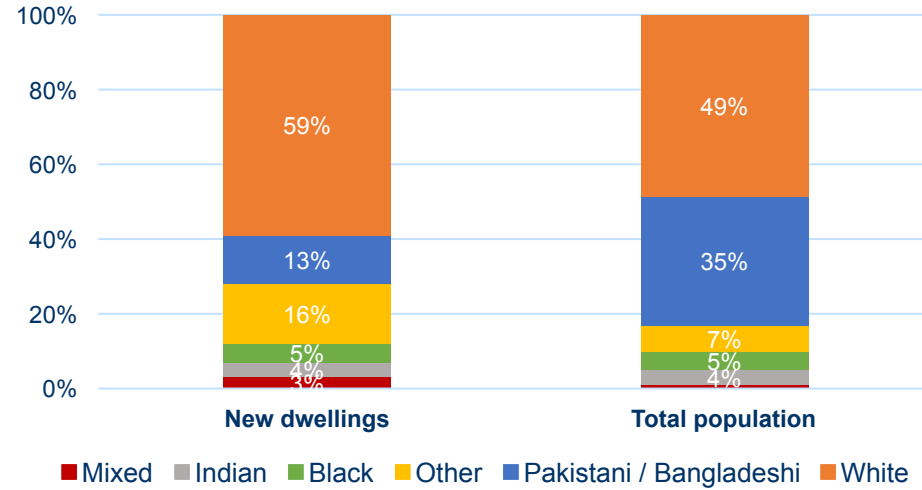
Other demographics



Gender (Aged 16+)

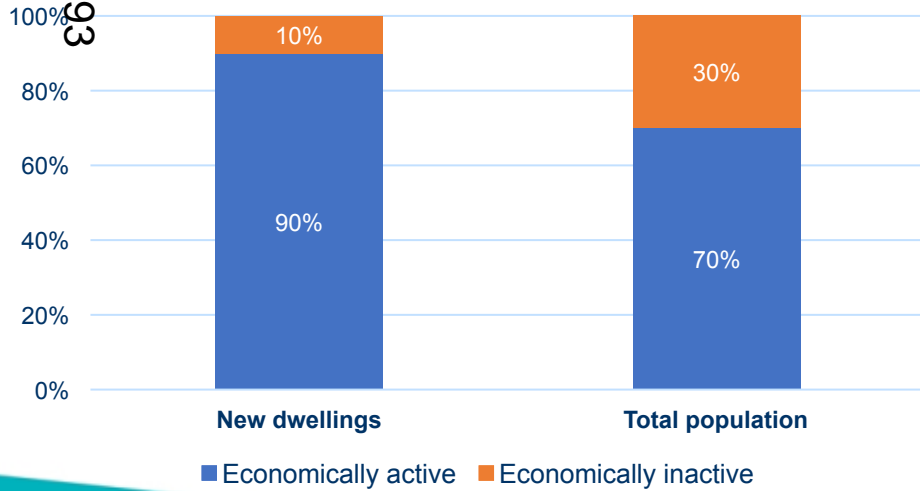


Ethnicity (Aged 16+)

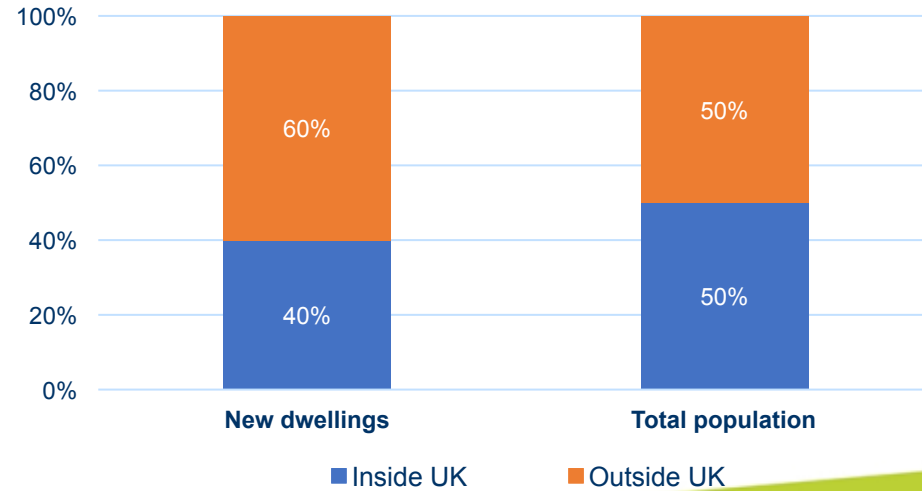


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Economic Activity (Aged 16+)



Country of Birth (Aged 16-64)



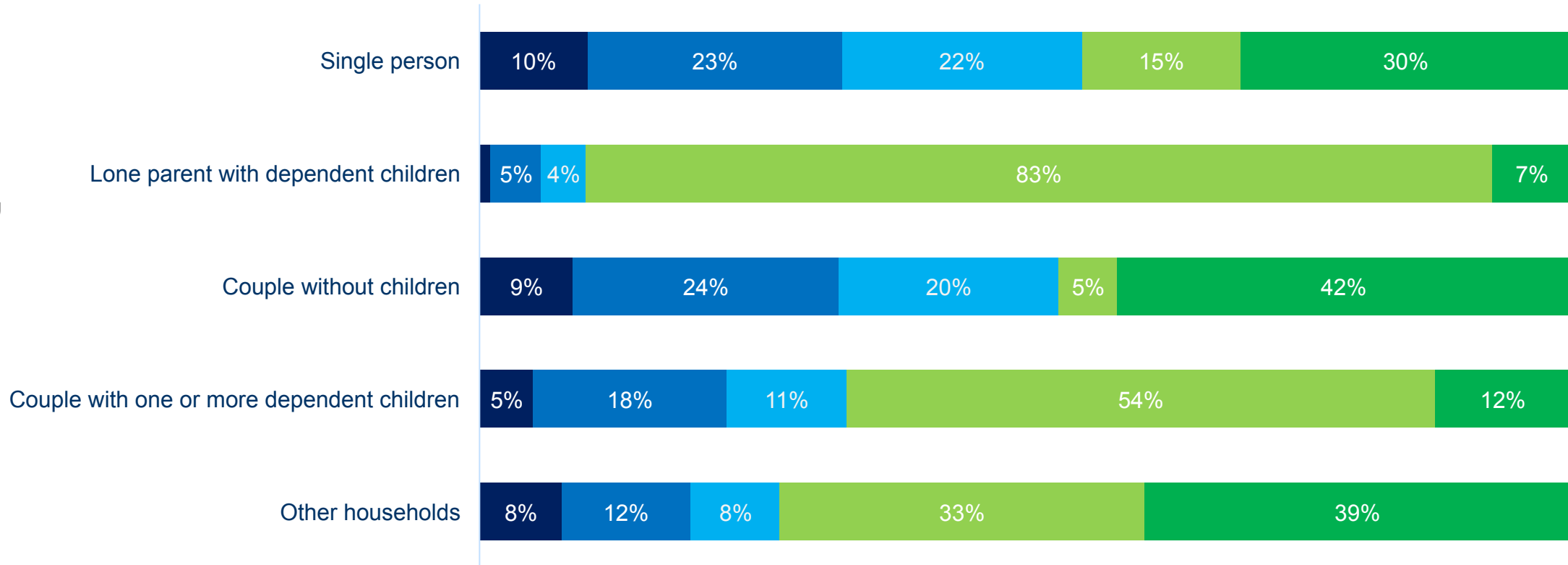
Household composition



Household composition by tenure



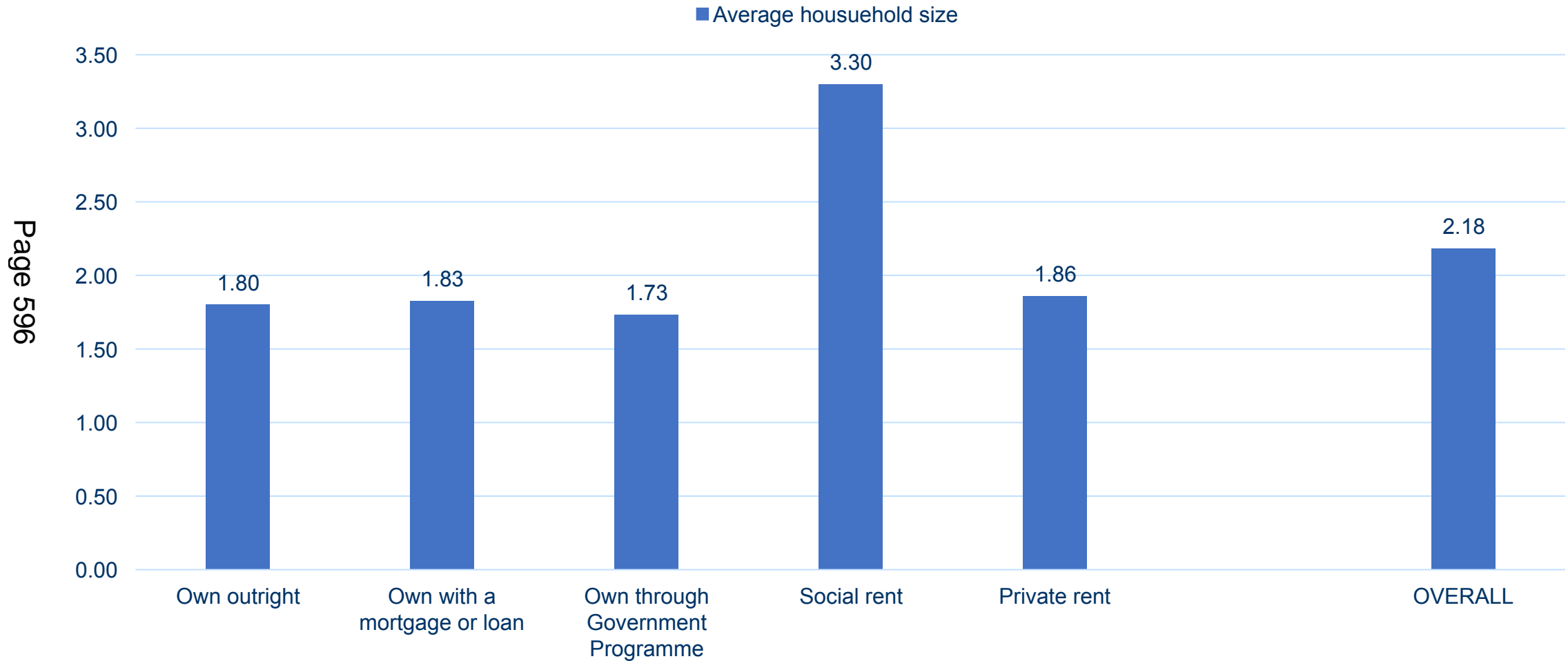
■ Own outright ■ Own with a mortgage ■ Own through Government Programme ■ Social Rent ■ Private Rent



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Average household size by tenure



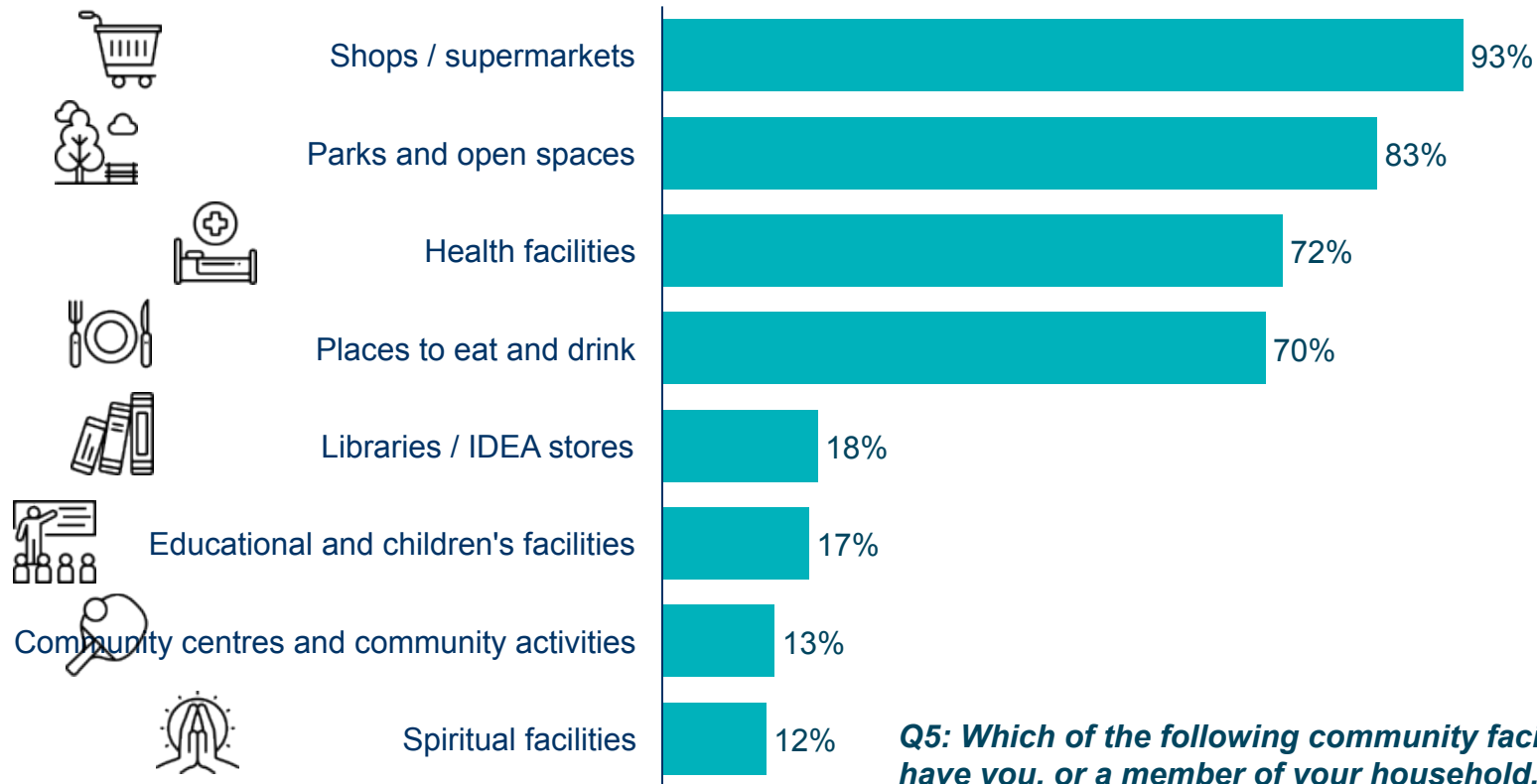
Use of local facilities



Local facilities used in last 12 months

- Most households have used shops / supermarkets (93%), parks and open spaces (83%), health facilities (72%) and places to eat and drink (70%) in the last 12 months.

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- Around half (49%) said their use of local facilities has been restricted due to COVID-19 lockdown rules.
- The extent to which some services have not been used in the last 12 months may have been exacerbated by COVID-19.

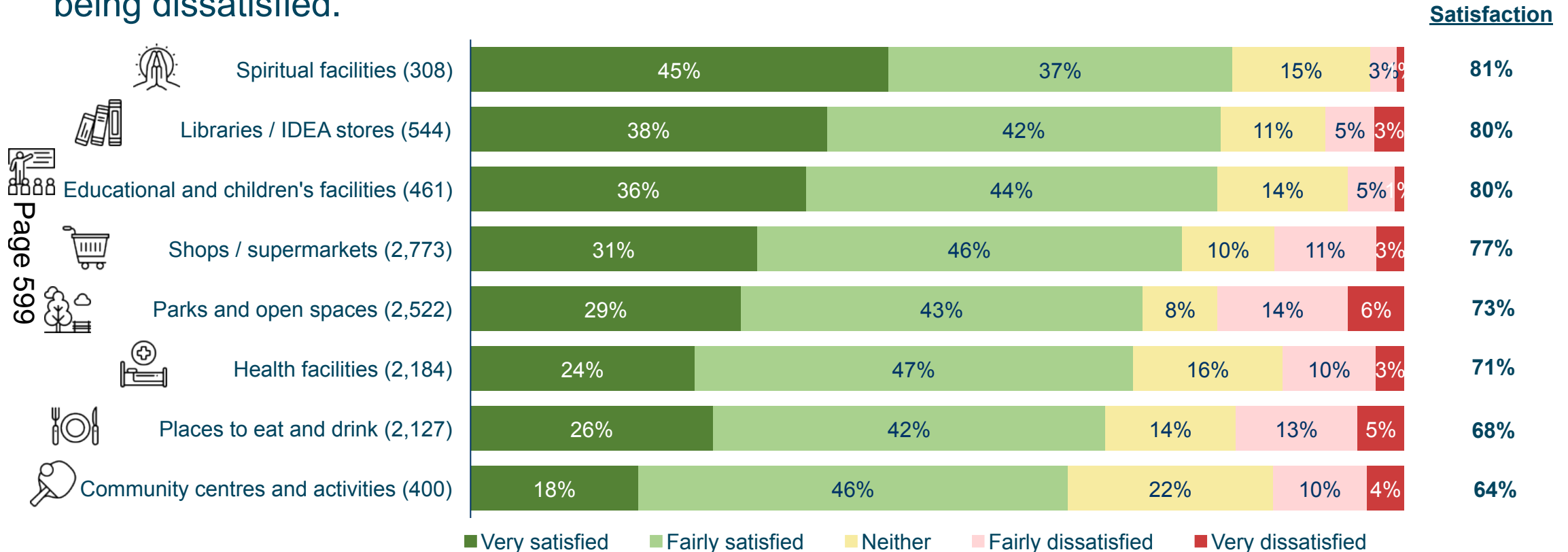
Q5: Which of the following community facilities within your local area have you, or a member of your household, used in the past 12 months?
Base: All residents (2,978)



Satisfaction with community facilities – by users



- When looking at users, four fifths or more say they are satisfied with spiritual facilities (81%), Libraries / IDEA stores (80%) and educational / children’s facilities (80%).
- Around a fifth (18%) of residents who have used parks and open spaces reported being dissatisfied.



Q9A-H: Taking into account the quality, availability, and access to various community facilities in the local area, how satisfied or dissatisfied are you with each of the following...?

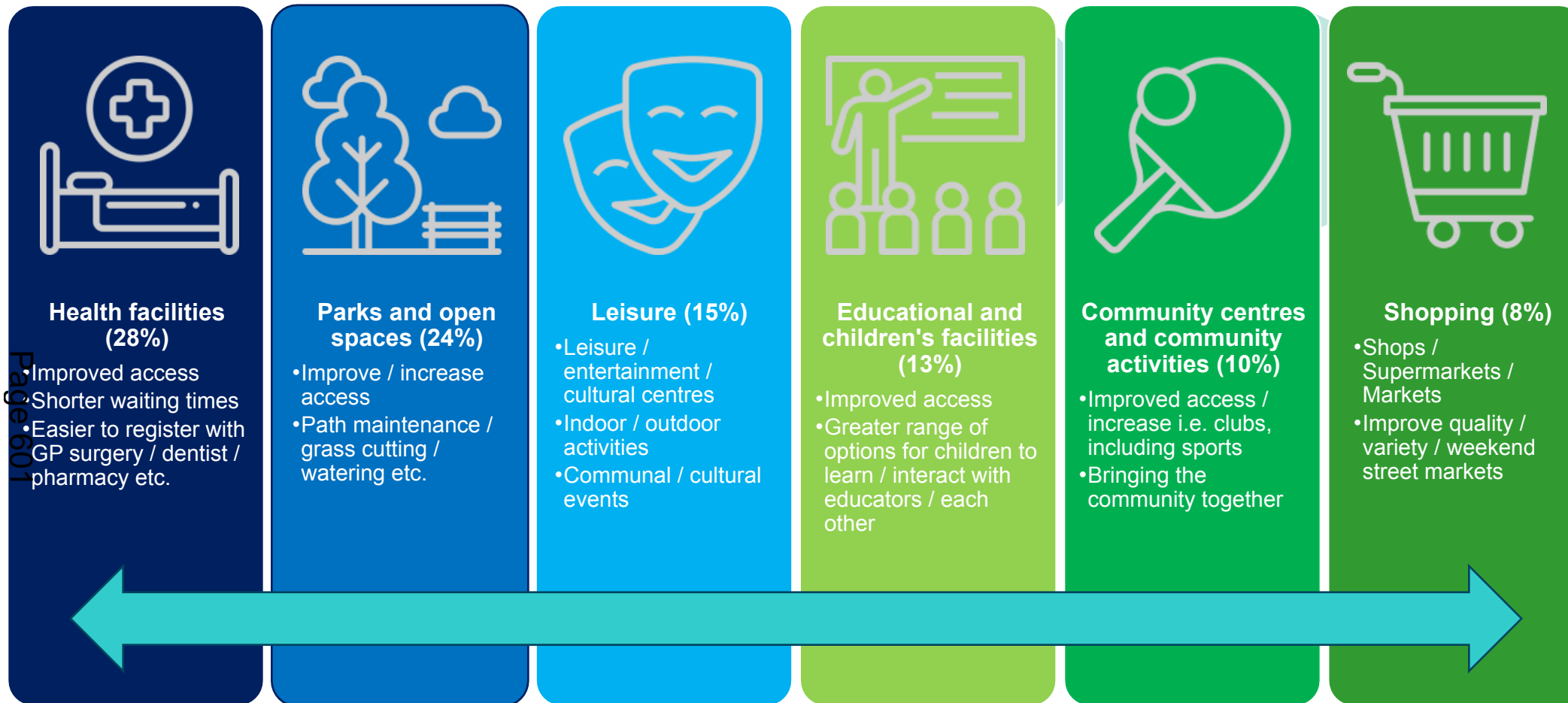
Base: Residents who have used each facility



Future priorities



Main priorities for Tower Hamlets Council

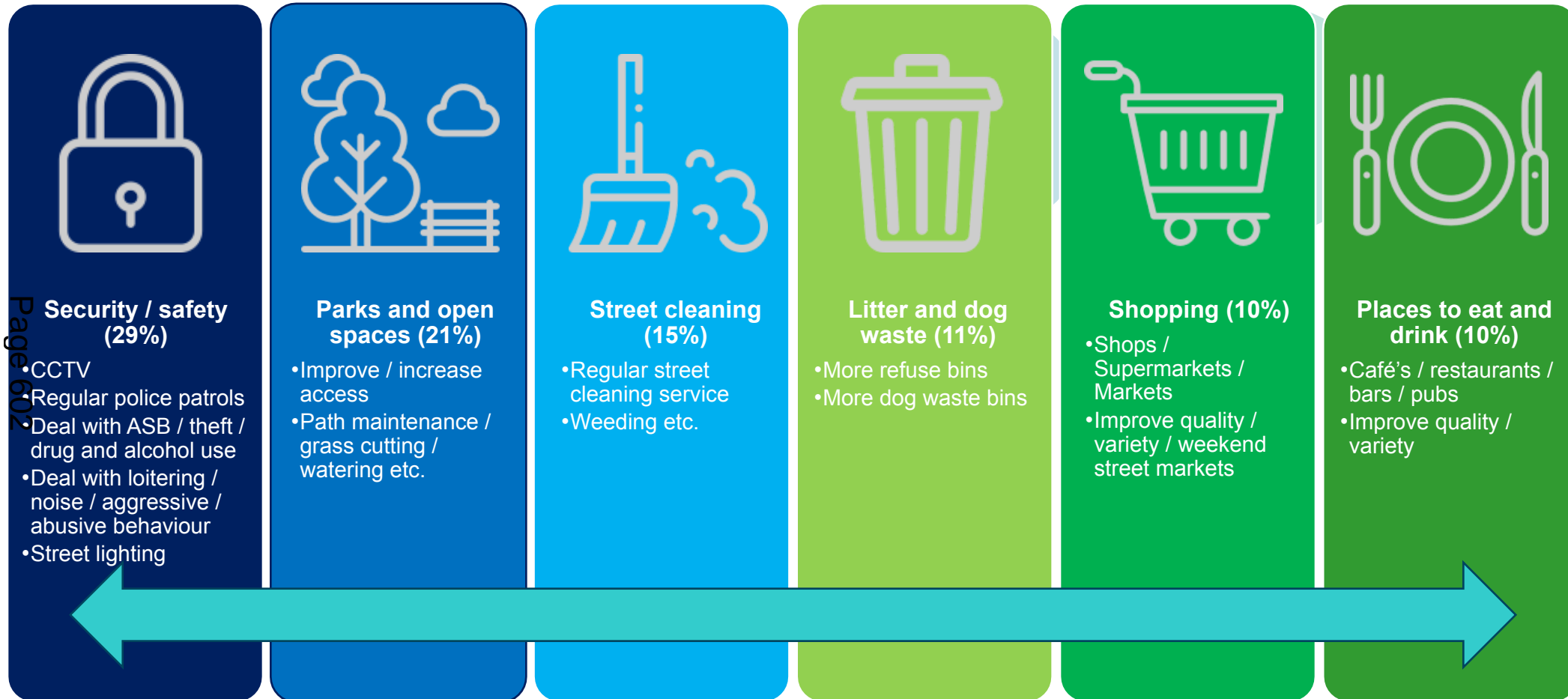


Q11: What, if anything, are the main priorities in terms of community facilities / infrastructure (e.g. health facilities, education facilities) that Tower Hamlets Council should consider for your local area? (Top responses)

Base: All residents who answered the question (1,820)



Main improvements needed in Tower Hamlets



Q12: What, if anything, do you think Tower Hamlets Council could do to improve your local area? (Top responses)

Base: All residents who answered the question (2,163)



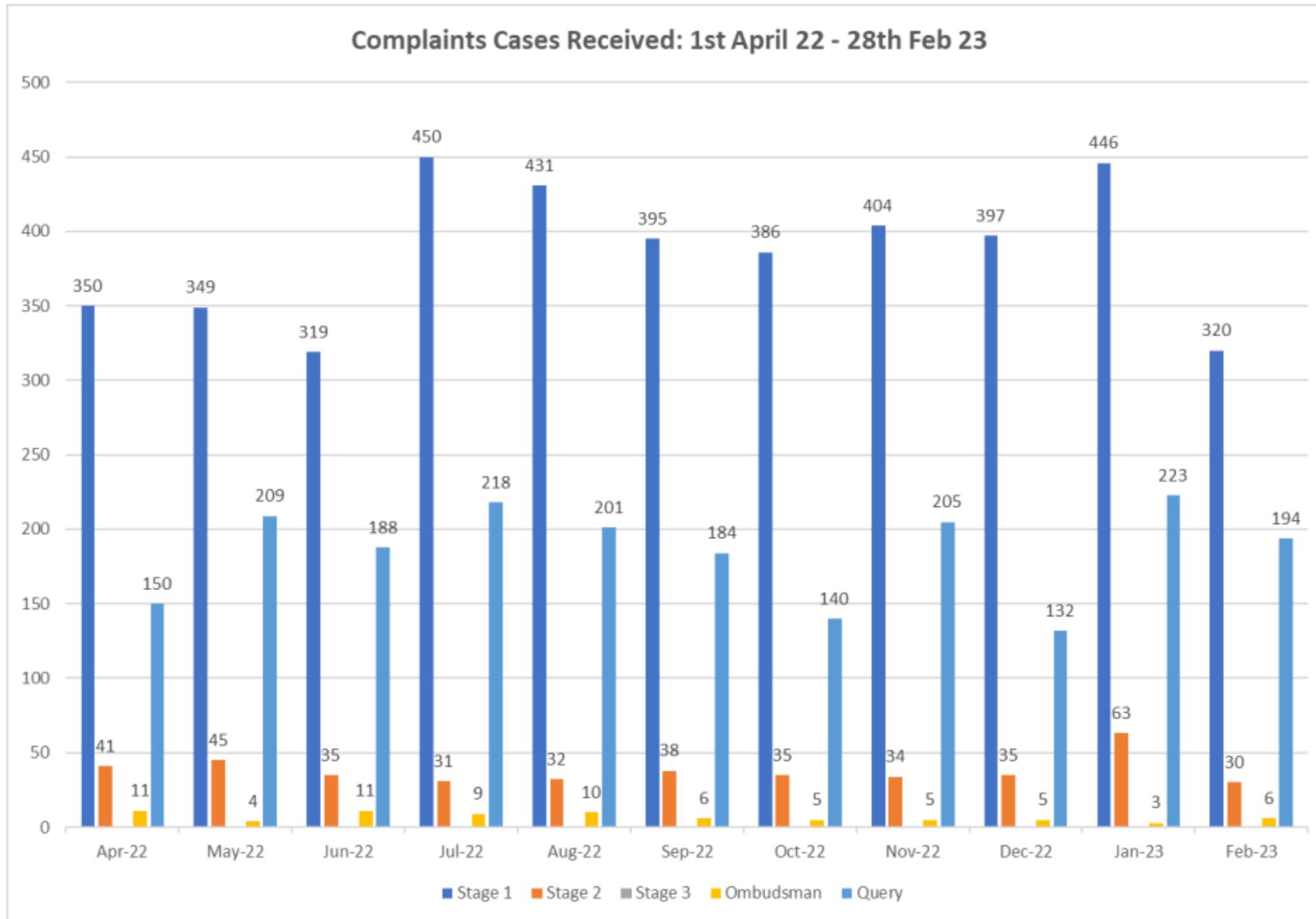
Information Governance

Complaints and Member Enquiries Data- Feb 2023

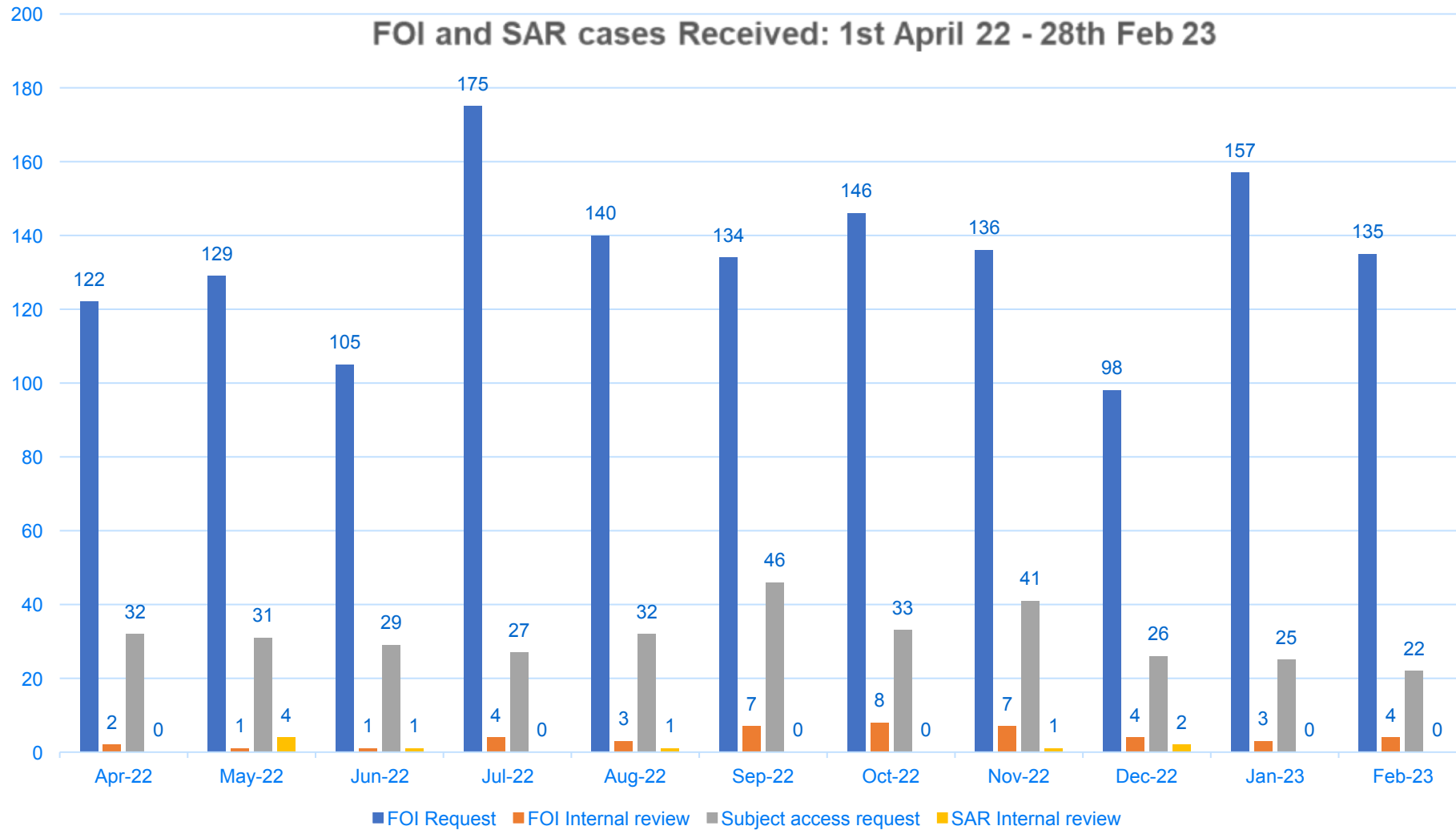
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Section 1: Complaints



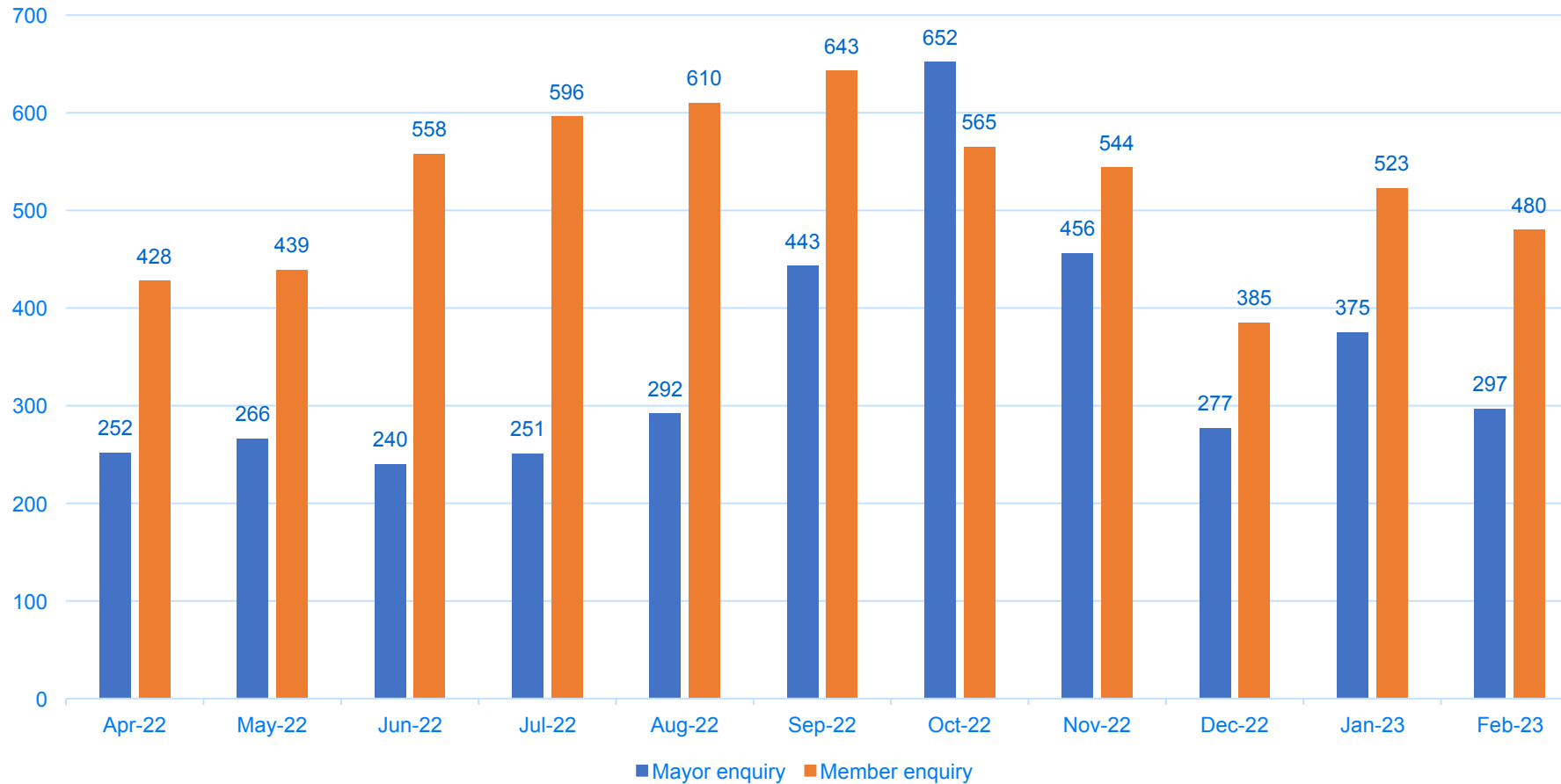
Section 2: Information Requests and Compliance



Section 3: Members Enquiries



Members Enqs and Mayors Enqs: Apr 1st 2022- 28th Feb 2023



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Call Centre and Residents Hub

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Contact Centre Call Performance – April 2021 to October 2022

Service	Total Calls offered	Total calls answered
Council Tax	111683	89020
Switchboard	95698	84454
Benefits	83496	58546
Parking	66208	55534
Streetline	17580	13905
Pest Control	5610	5426
Complaints Service	1388	1204
Members	156	94

Month	% answered within 2 minutes
Apr-21	58.25%
May-21	58.48%
Jun-21	64.17%
Jul-21	59.52%
Aug-21	53.51%
Sep-21	54.19%
Oct-21	56.40%
Nov-21	44.17%
Dec-21	51.31%
Jan-22	50.29%
Feb-22	68.99%
Mar-22	45.07%
Apr-22	54.60%
May-22	57.40%
Jun-22	61.04%
Jul-22	56.53%
Aug-22	51.84%
Sep-22	48.61%
Oct-22	57.00%



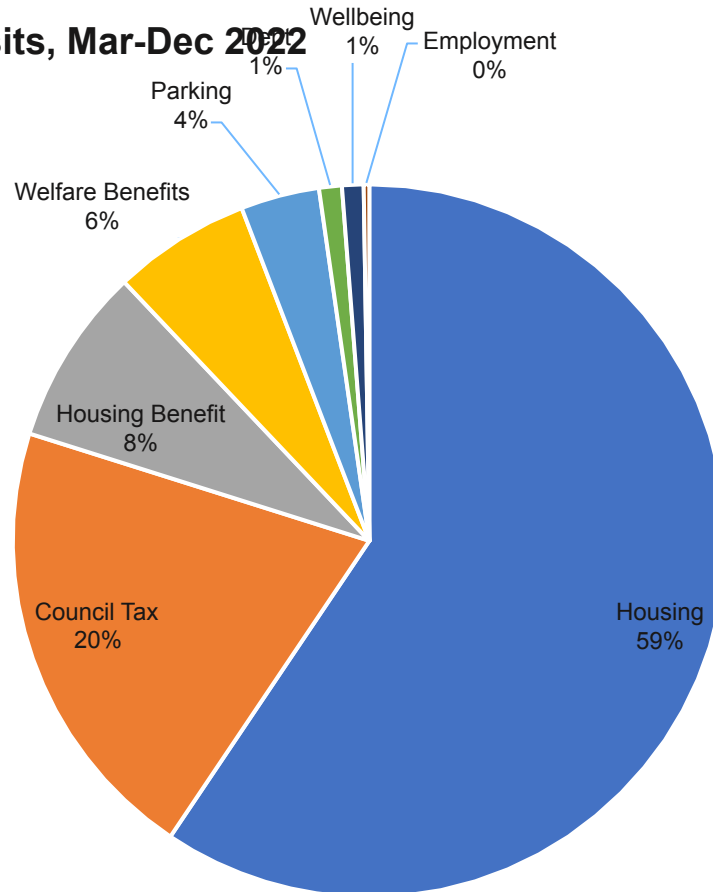
Factors impacting achieving target of 80% calls answered in 2 minutes

- Impact from a number of changes for Council Tax
- Staff moved to support the Residents' Hub
- Absorbing Social Media response into the Contact Centre

In March- December 2022, Residents Hub had 6,779 visits. The most popular theme was Housing (59%), followed by Council Tax (20%)



Residents Hub visits, Mar-Dec 2022
Total visits: 6,779



- In the period between March and December 2022, the Residents Hub received 6,779 service user visits.
- 59% of them were about Housing, followed by Council Tax (20%).



Digital access to the council – the website, online form and social media



Visits to the council website: The most popular page was 'manage your council tax account' in July-Sept 2022

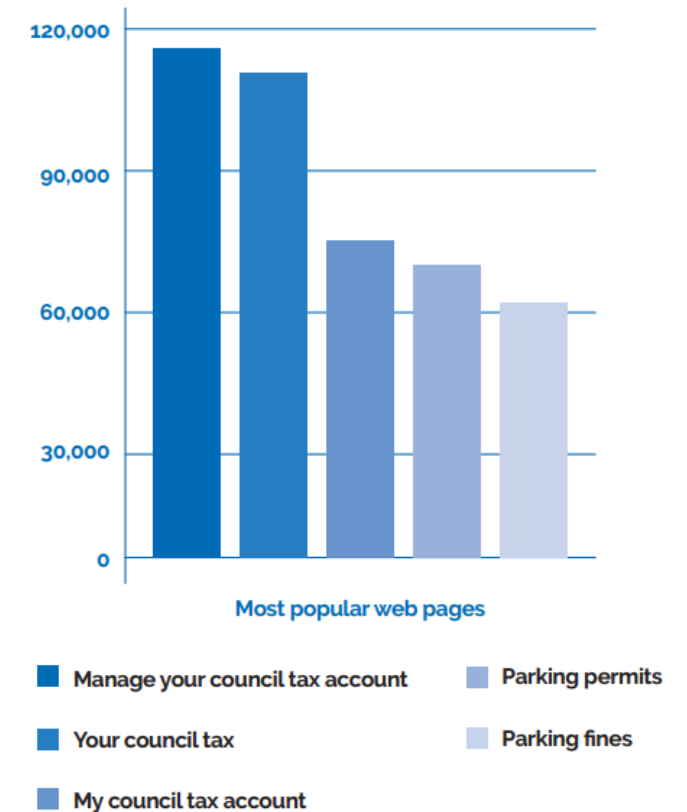


	July	August	September	Q2 total
Visits 2022	354,289	357,118	369,323	1,080,730
Visits 2021	427,170	387,677	371,400	1,186,247
Percentage change	-5.9%	-5.3%	-14.9%	-8.9%

Visits

- In July-Sept 2022, visits to the website have decreased by 9 per cent (105,517) compared to the same period of 2021.
- The decrease is expected as the COVID-19 pages that were in such demand a year ago are no longer used by customers.
- The most popular page remained 'Manage your council tax account'.

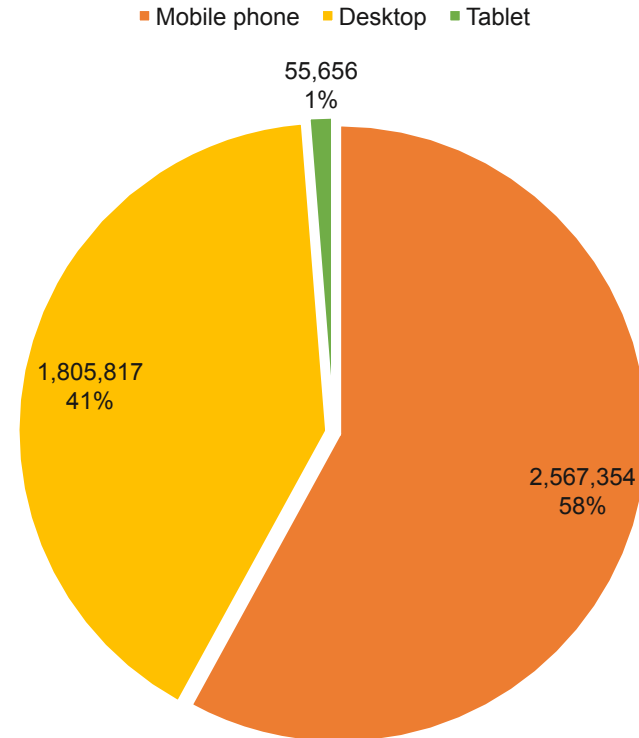
Most popular webpages, July-Sept 2022



In 2022, 58% of visits to the council website were made via mobile phone, followed by desktop (41%)



Number of visits to the council website by device, 2022



- 58% of visits to the council website was made via mobile phone, followed by desktop (41%).



The council website is more accessible than the Local Government benchmark. However, it can use Plain English more.



Accessibility Score: a measure of how well a site meets the standards set out in WCAG (Web Content Accessibility Guidelines).

- Council website’s accessibility score on 30 Sept 2022: 92.2 (out of 100)
- Local Government benchmark on 30 Sept 2022: 85.8 (out of 100).

Plain English: the council aims to make the website as easy to understand as possible, i.e. a reading age of 14 years or younger.

- 46.8%: ‘Difficult to read (18-19 years old)’ readability
- 26.7%: ‘Fairly difficult (15-18 years old)’
- 17.1%: ‘Plain English (13-15 years old)’ or more readable.

Use of Plain English in the council website, Q2 2021-22

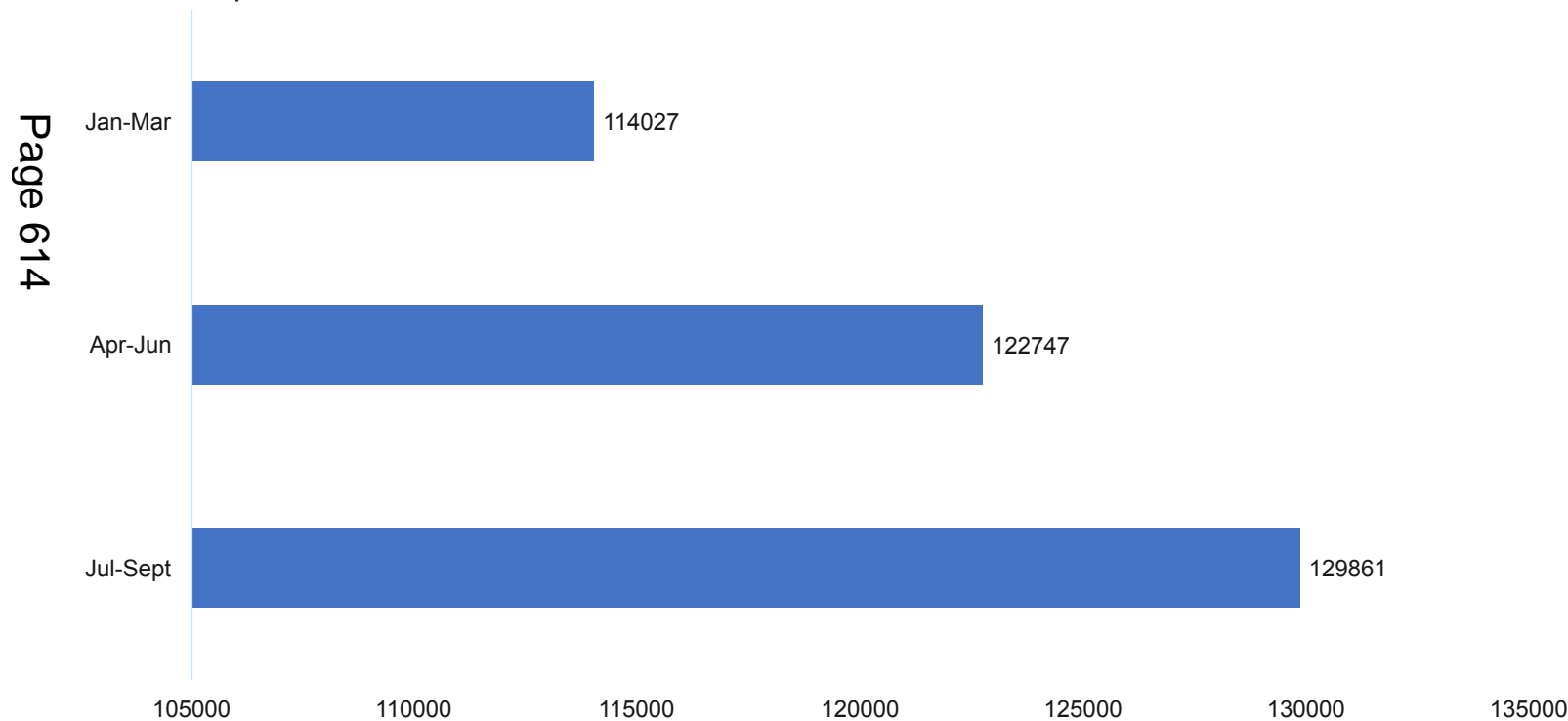
Page readability	Pages	% of total	
Very easy (10-11 years old)	9	0.2%	17.1%
Easy to read (11-12 years old)	29	0.7%	
Fairly easy to read (12-13 years old)	171	4.07%	
Plain English (13-15 years old)	509	12.1%	79.7%
Fairly difficult (15-18 years old)	1,123	26.7%	
Difficult to read (18-19 years old)	1,965	46.8%	
Very difficult to read (19 years old)	262	6.2%	
No readability score	127	3.02%	3.02%



The number of people who registered to use the council's online forms increased steadily between January and September 2022.



Numbers of users registered on the Granicus online form, Jan-Sept 2022



The number of people who registered to use the council's online forms increased every quarter between January and September 2022

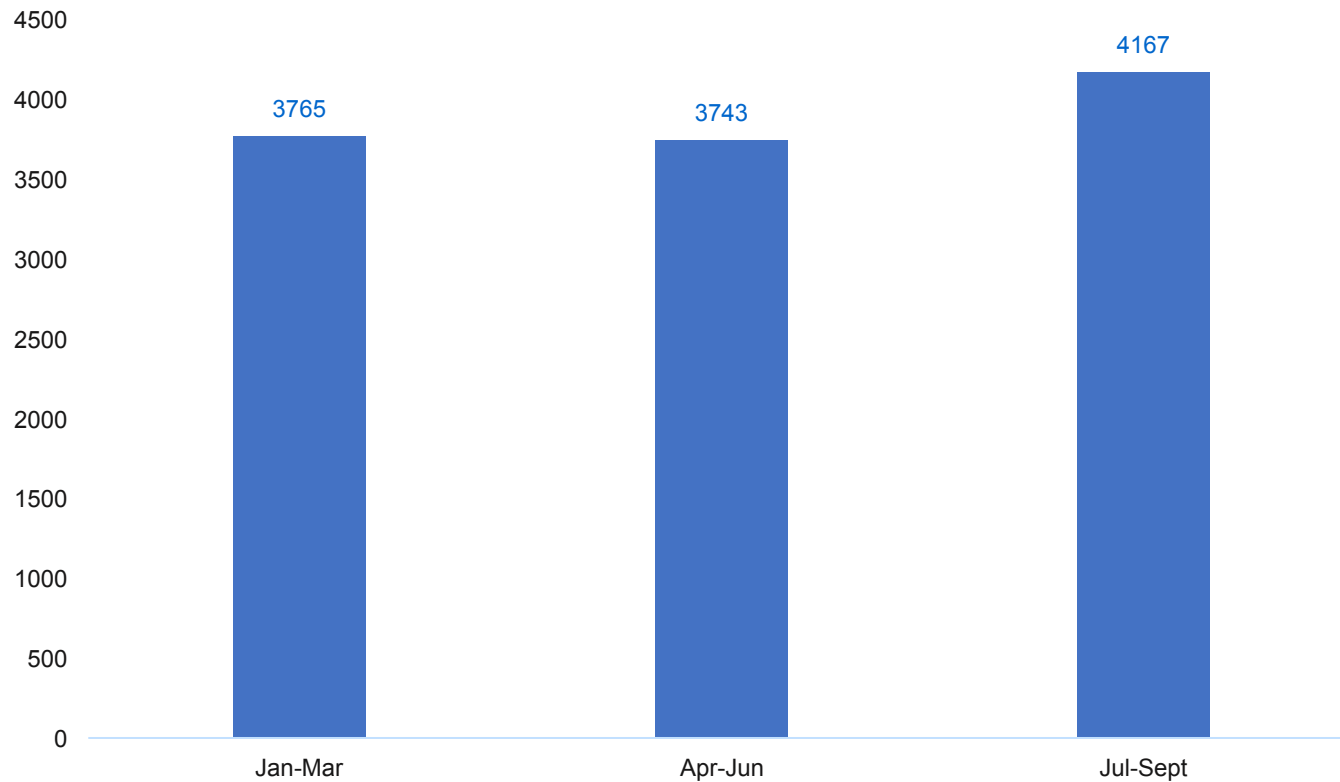
- January-March 2022 saw an increase of 6.5% registered users from the previous quarter
- April-June 2022 saw an increase of 7.8% registered users from the previous quarter
- July-September 2022 saw an increase of 5.6% registered users from the previous quarter.



95% of bulky waste requests were made online in Jul-Sep 2022



Bulky waste online request, Jan-Sept 2022

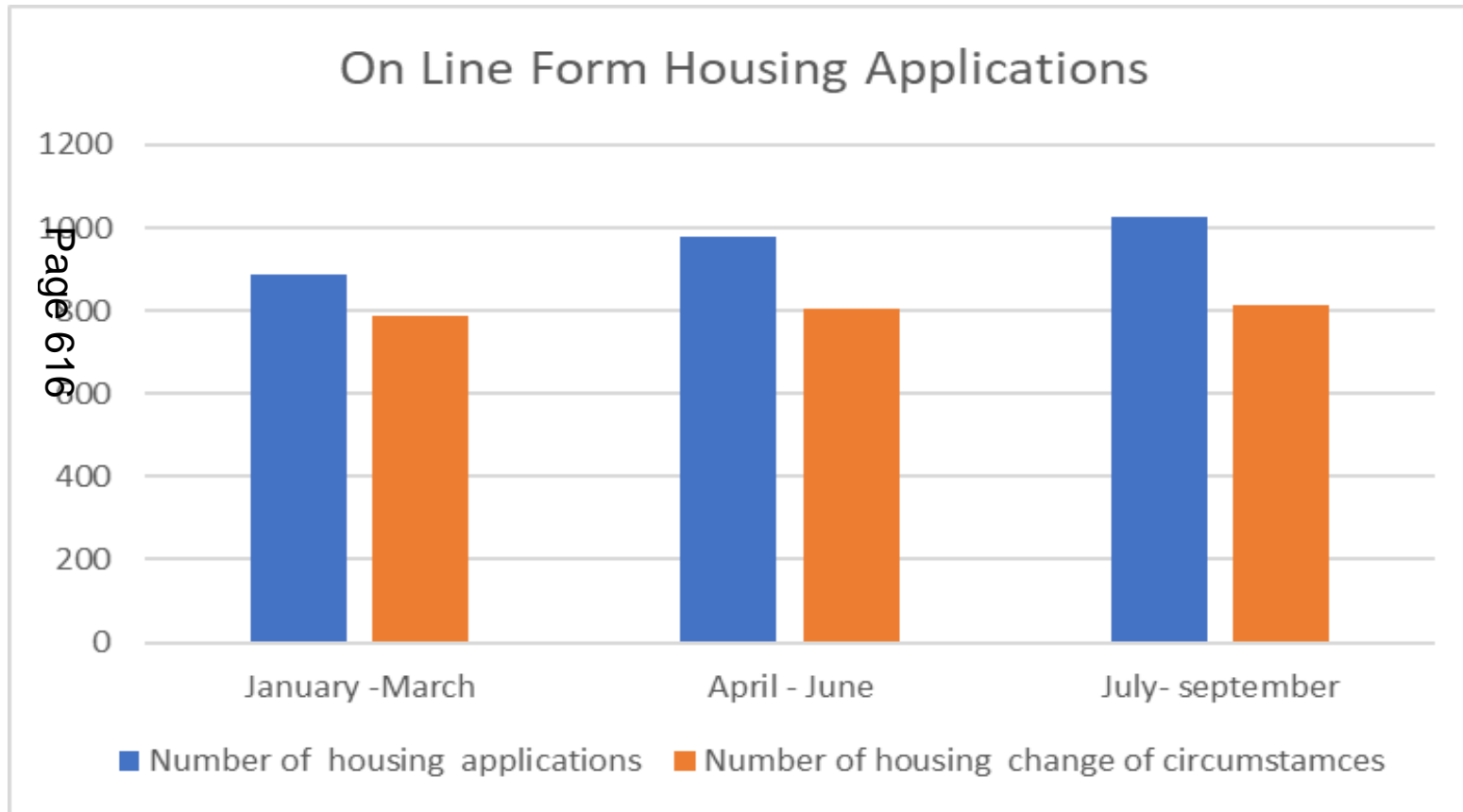


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- In Jul-Sept 2022, 4,167 bookings were made using the online system. During this quarter, the contact centre took 205 bookings, resulting in 95 per cent being requested online.
- Then online form offered a more convenient option for residents. Also, it is estimated that having these appointments online has saved the council £34,211.07.



The number of housing applications submitted online increased every quarter between Jan and Sept 2022



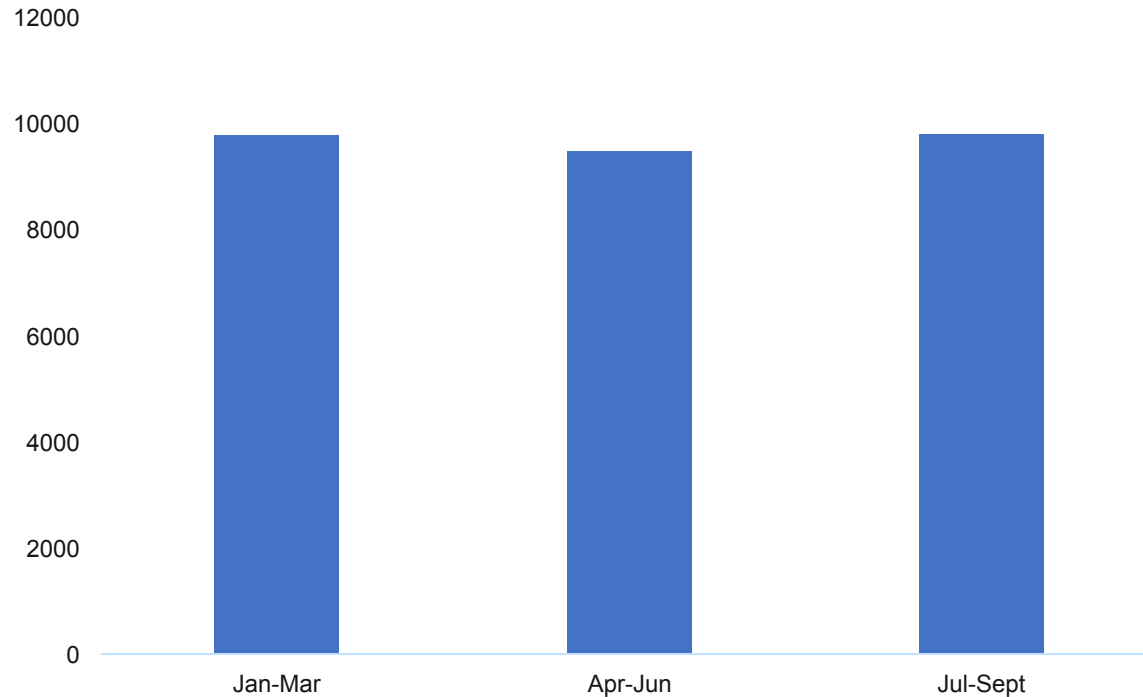
- The number of housing applications submitted online increased every quarter between Jan and September 2022.
- In July-Sept 2022, 1,024 housing applications were submitted online.
- Online reporting on change or circumstances increased slightly at each quarter during this period.



The council received over 9,000 messages via Social Media at each quarter between Jan and Sept 2022



Incoming messages via Social Media, Jan-Sept 2022



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The council received over 9,000 social media messages at each quarter between January and September 2022.

Top five topics of the messages

January – March

1. Waste collection
2. Road, pavement and parking
3. Street issues, fly tipping and bins
4. Arts, events and culture
5. Council tax

April – June

1. Council tax
2. Waste collection
3. Arts, events and culture
4. Elections and voting
5. Road, Pavements and parking

July – September

1. Waste collection
2. Arts Events
3. Street issues, litter, fly tipping and bins
4. Transport Policy, Liveable Streets
5. Council tax



Housing



People who joined the borough's common housing register wait for a social housing tenancy offer for a long time



Average waiting time in years – based on the actual lets for the financial year 2021/22

Priority band	Studio	1 bed	2 bed	3 bed	4 bed	5 beds
Band 1 (high priority need)	3	2	4	6	8	8
Band 2 (priority need)	4	5	6	10	13	11
Band 3 (general housing options)	5	6	14	9	No lets	No lets

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- There is a large demand for social housing in Tower Hamlets. There were 21,840 housing applicants on Tower Hamlets Common Housing Register (CHR). Around 43% of households (9,374) were living in overcrowded conditions making up 73% of applicants in Bands 1 and 2.
- 1,972 applicants lack 2 or more bedrooms; 311 lack 3 or more bedrooms
- The council and its registered social landlord partners operate a housing register for those who are eligible.
- Most people who join the housing register are very unlikely to be offered a social housing tenancy. Even if they qualify, they may have to wait for a long time.



LBTH Children and Family Centres User feedback, 2022



Children and Family Centres annual survey 2022



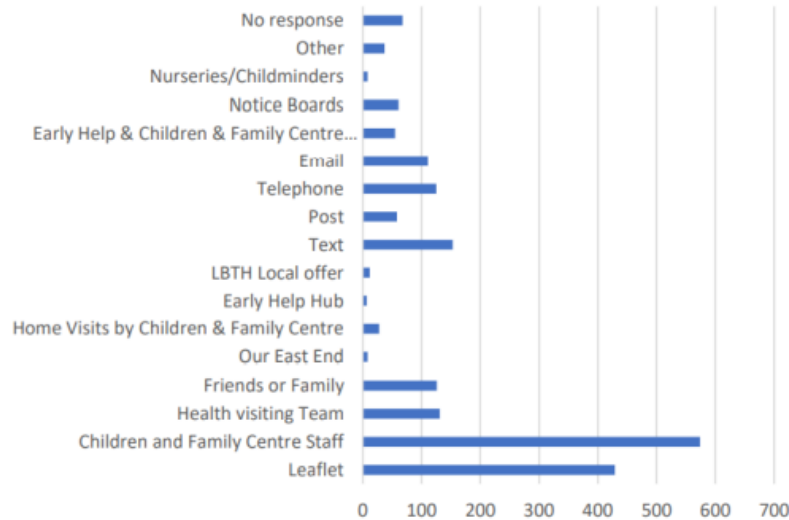
- Conducted in February 2022
- 1,136 samples
- The centres offer services to 19 years old and up to 25 with Special Education Needs and Disability
- Support and Empower parents and families to access a wide range of care, play and support services
- A centre for joined-up services with partners
- The survey questions include how the users are satisfied with the centres' four service areas



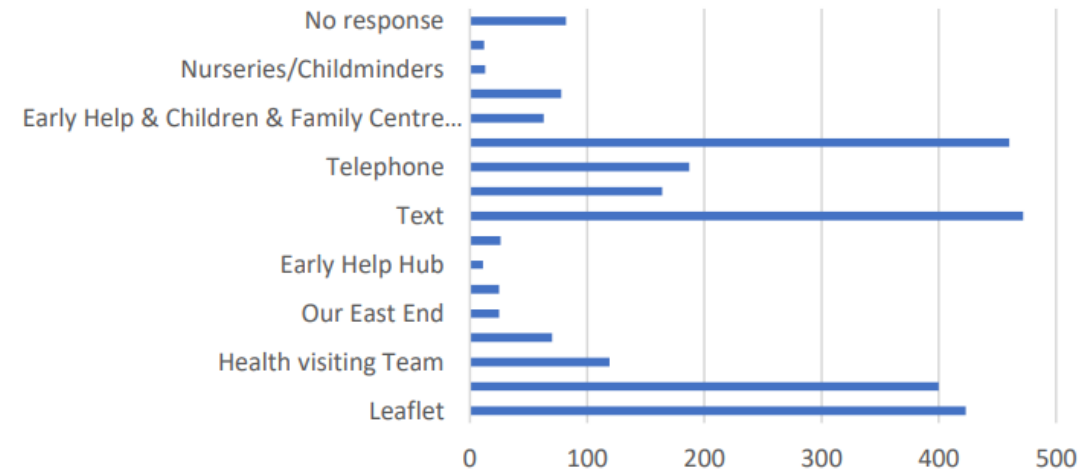
The centre users would like to be kept informed by text messages, followed by emails, leaflets and via the centre staff in the future



How are you kept informed of the services provided? 2021/22



How would you like to be kept informed of services in the future? 2021/22

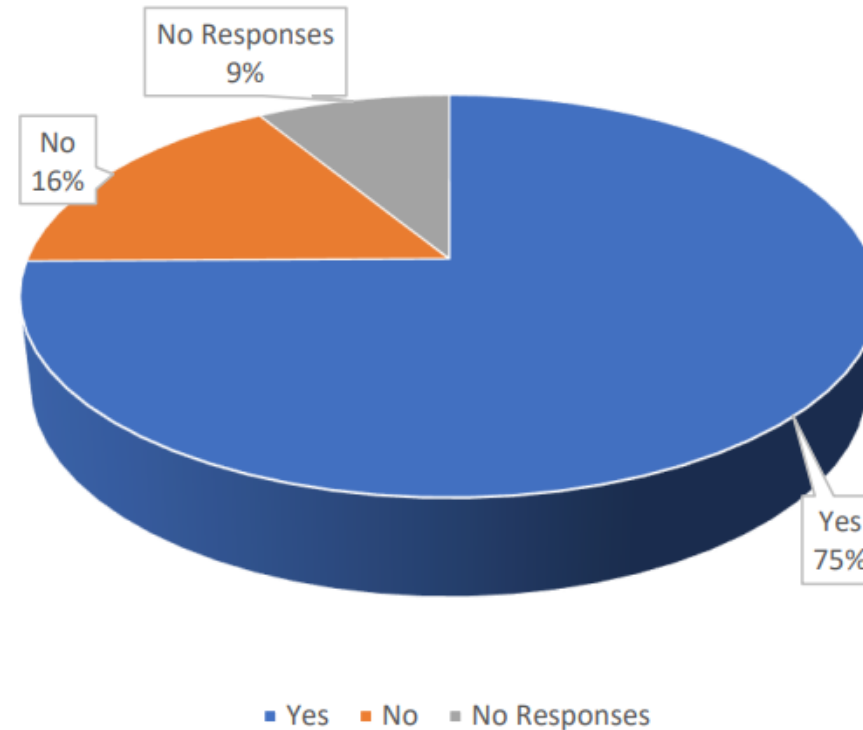


- In 2021/22, the centre staff and leaflets were two key methods to provide information for the users.
- They would like to be contacted by text messages, emails, leaflets and the centre staff in the future.



75% of the survey respondents found the centres' communications and publications accessible.

Do you find our communications and publications easy to read and accessible?



The users found they feel welcomed at the centres overall.



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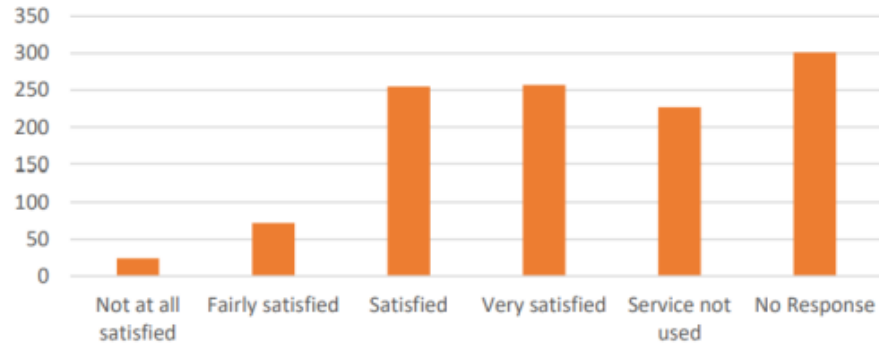
Suggestions on improving how welcome the centres are	Analysis
More capacity	A major issue; parents feel they are being turned away due to space shortage. A booking system will ensure families can access the service fairly and equally.
More communication	Parents want more interaction with staff to feel welcome
More activities, trips and sessions	Demands for more activities in general as well as for the older children during evenings and school holidays.
Longer hours, flexible times	Demands for activities during evenings and school holidays for older children.



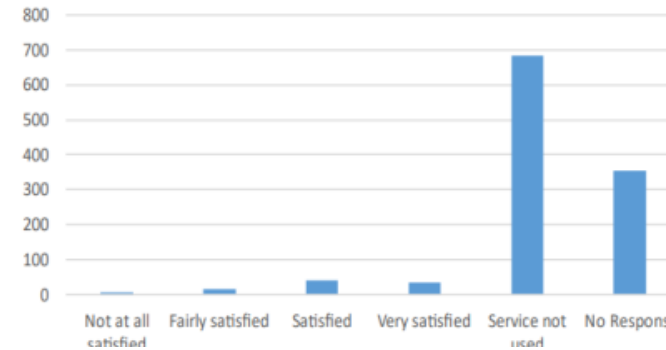
Most users were satisfied with the services the centres offer



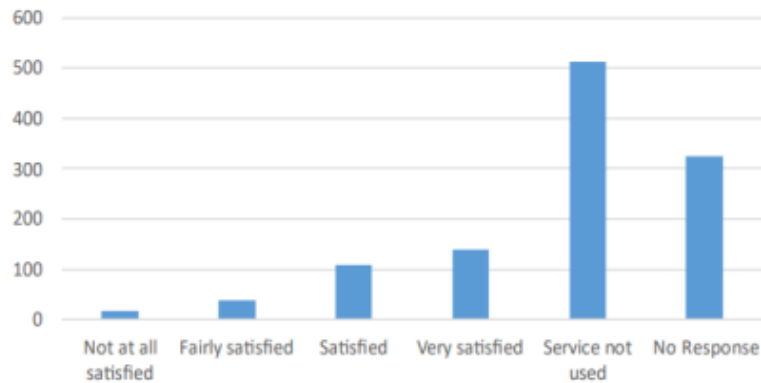
Satisfied with Health Services? 2021/22



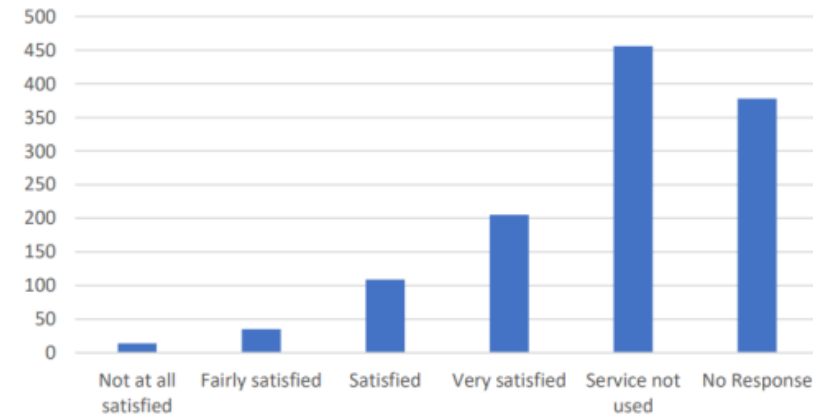
How satisfied were you with the service provided? 2021/22



How satisfied with Family Support Services? 2021/22



Satisfied with Early Learning Services? 2021/22



Personal Social Services Adult Social Care Survey, 2021-22

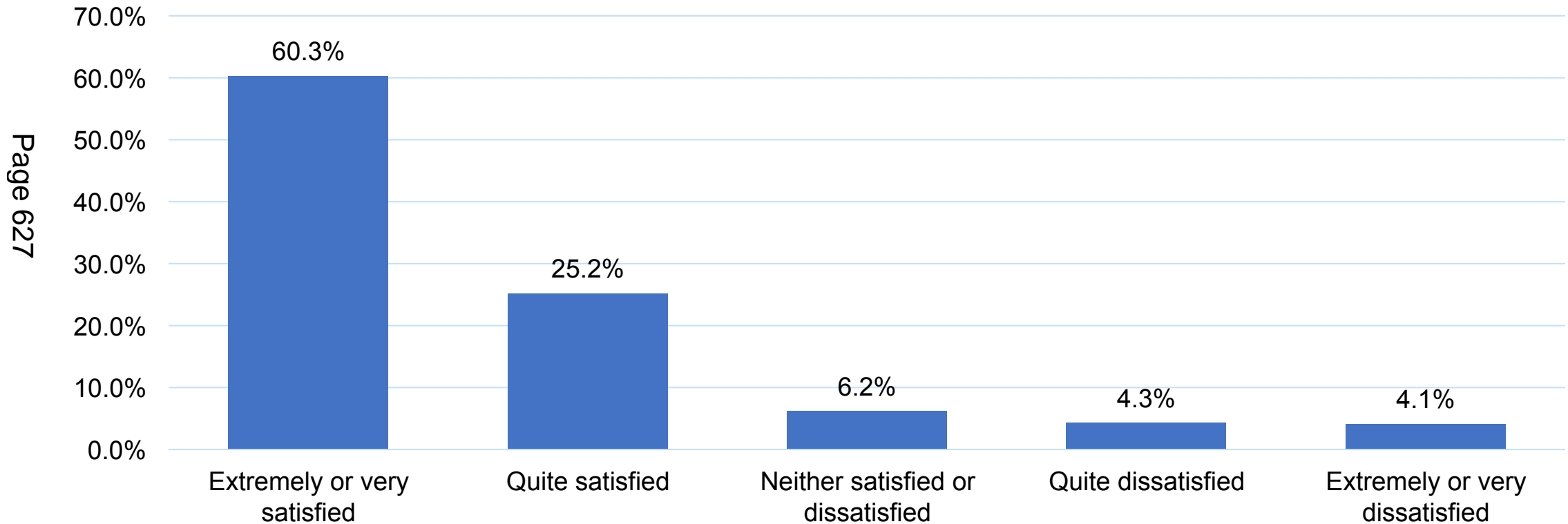
Tower Hamlets response (3,185 respondents)



Over 85% of the respondents were satisfied with the services they had received



Q1 combined - Overall, how satisfied or dissatisfied are you with the care and support services you receive?



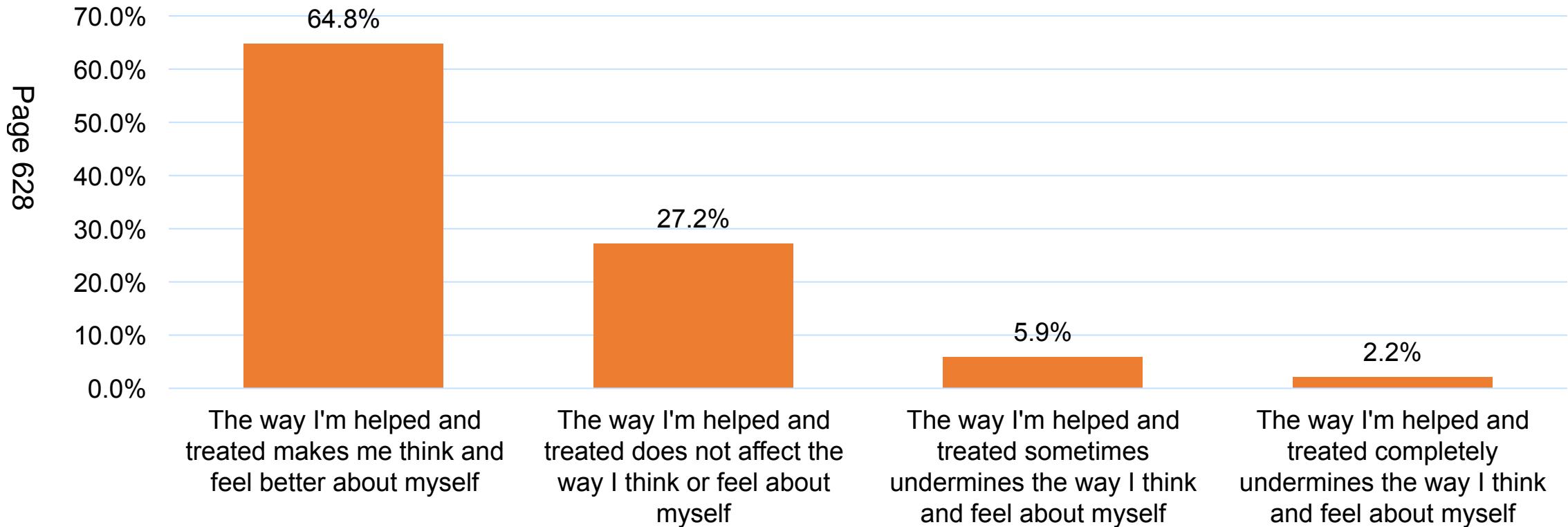
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65% of the respondents found that the way they were helped and treated made them think and feel better about themselves



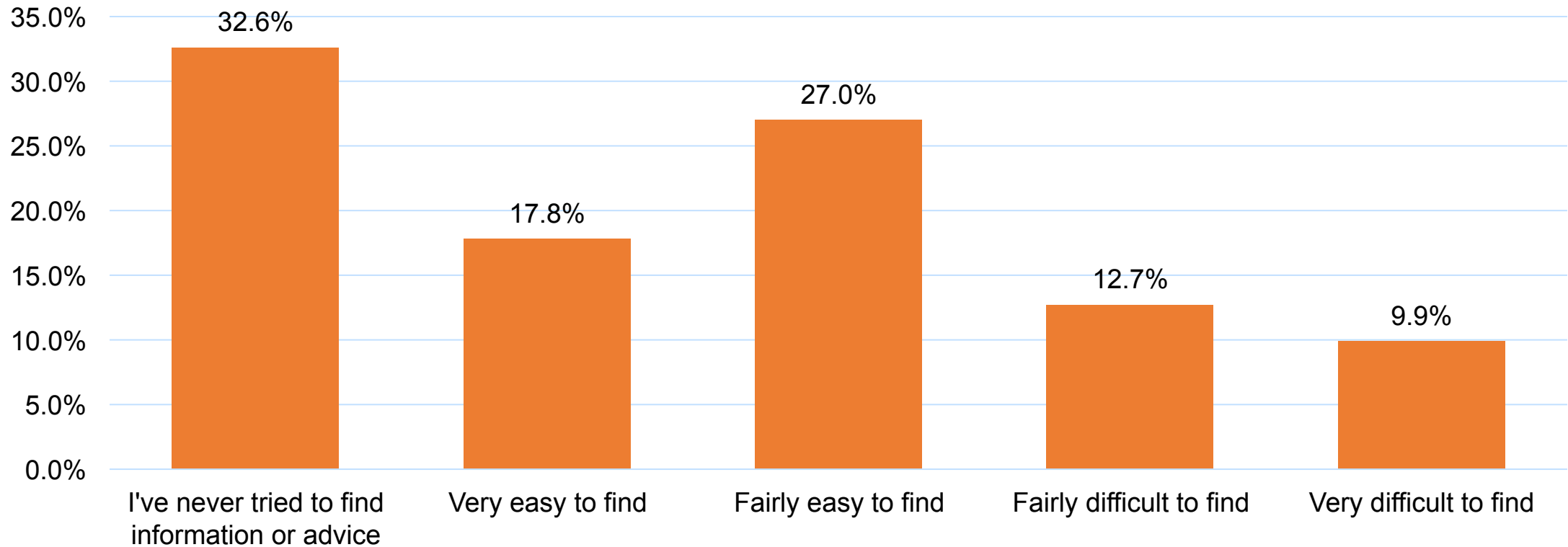
Q11 - Which of these statements best describes how the way you are helped and treated makes you think and feel about yourself?



About 45% of the respondents found finding information and advice were generally easy. 33% have never tried to find information or advice



Q12 - In the past year, have you generally found it easy or difficult to find information and advice about support, services or benefits?



Idea Stores and Libraries, and Learning



In 2021/22, the number of visits to Idea Stores and the libraries was 38% of the 2018/19 level



IDEA STORES AND LIBRARIES VISITS 2018/19-2021/22



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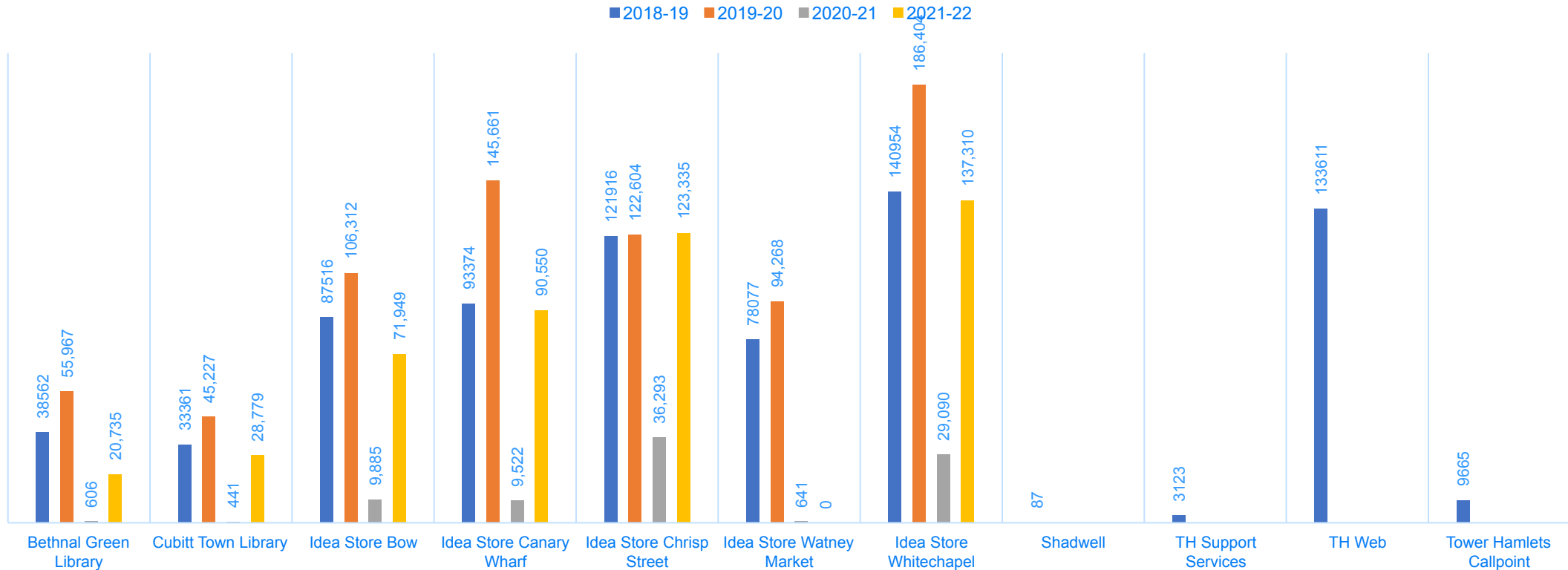
- In 2018/19, Idea Stores and the libraries received 1,872,583 visits. In 2021/22, they had 708,891 visits, 38% of the 2018/19 level.



In 2021/22, the number of Idea Stores and Libraries issues was 62% of the 2019/20 level



IDEA STORES AND LIBRARIES ISSUES



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- In 2018/19, there were 740,242 Idea Store and Libraries issues; 756,443 in 2019/20; 472,658 in 2021/22. In 2021/22, it was 62% of the 2019/20 level.



Vast majority of Idea Store learners were satisfied with the courses they undertook in 2021/22



Skills the learners are developing	Satisfied with courses	Would recommend to family and friends
Communication, Languages, Creative skills	98%	96%
Creative skills, Communication, Work skills and career progression, Employability, Child development, Digital skills	98%	97%
Creative skills, Communication, Work skills and career progression, Employability, Digital skills	97%	98%

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- Idea Store Learners survey 2021-22
- Total enrolments: 4,720



Parking and Mobility services

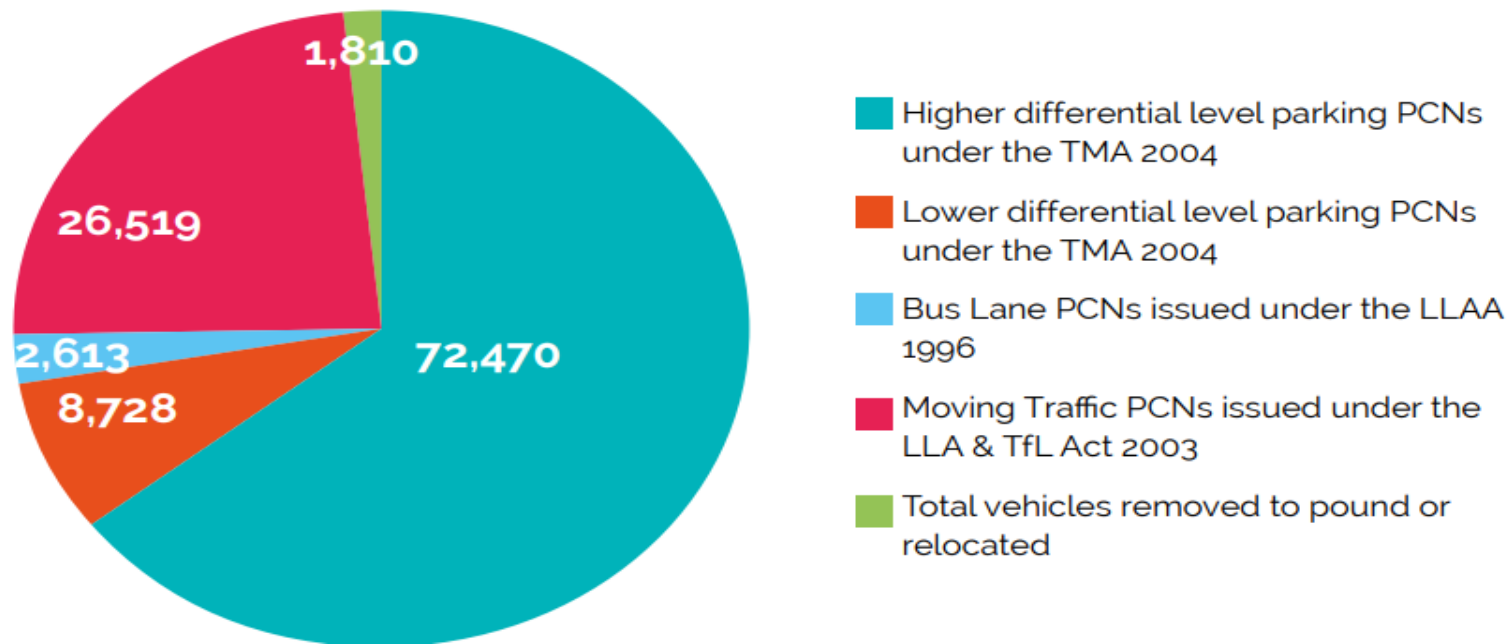


Parking and Mobility Services



Penalty Charge Notices issued 1st April 2020 – 31st March 2021

Enforcement statistics



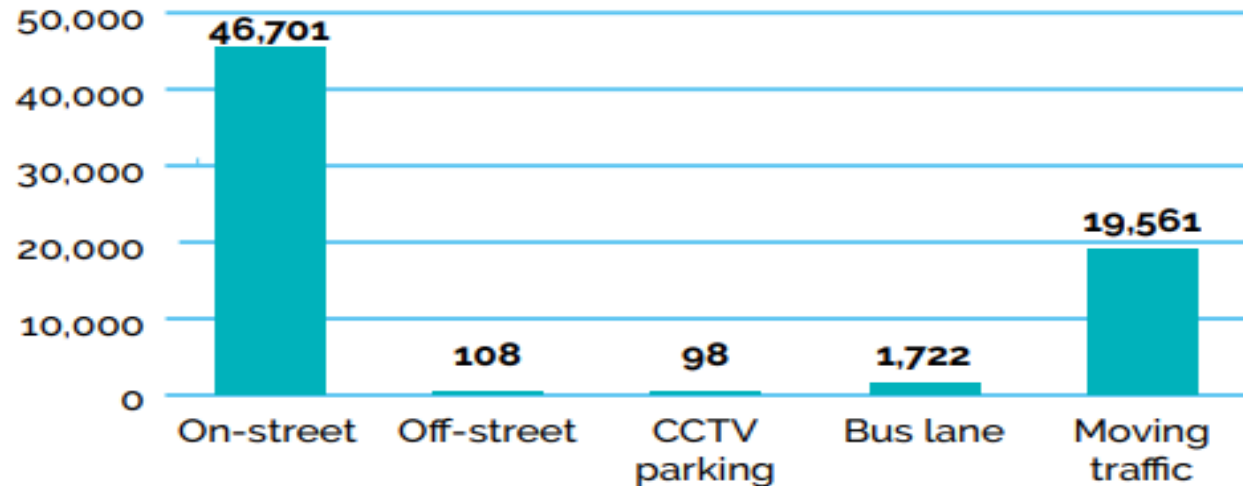
Parking and Mobility Services



Penalty Charge Notices, paid by type 1st April 2020 – 31st March 2021

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PCN's paid by type



The number of PCN 's paid by type were higher in the year 1st April 2019 – 31st March 2020

On-street	54,579
Off-street	232
CCTV Parking	199
Bus Lane	1940
Moving traffic	19,277



In 2020/21, 45,487 parking permits were issued in total, 66% of which were Resident parking permit



The number of parking permits issued by type, 1 April 2020 – 31 March 2021

Permit Type	Issued	Renewed	Total
Resident	22,054	8,088	30,142
Daily Temporary	12,861	N/A	12,861
Public Service	1,165	57	1,222
Business	687	125	812
Contractor	294	33	327
Car Club	90	0	90
Market	29	4	33
Total	37,180	8,307	45,487



In 2020/21, 393,250 parking vouchers were issued in total



Online parking vouchers issued by type 1 April 2020 – 31 March 2021

Voucher type	Online
Resident 60+	175,882
Resident	172,113
Carers	13,967
Public service	845
Market Trader	133
Total	362,940

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An additional 30,310 individual paper scratch cards were issued to residents 60+ or those who have a carer.



Tower Hamlets Council Customer Service Staff Survey – ServCheck Survey by The Institute of Customer Service





ServCheck Survey Results

Tower Hamlets Council

Tower Hamlets People Survey 2022

December 2022

What is ServCheck?

ServCheck is based on the Service Experience Model. It is designed to help you assess your employees' view of how your strategy, organisation, culture and processes enable you to deliver world class customer service.



Assess your current levels of commitment and engagement to customer service



Improve service with input across your organisation



Benchmark against other organisations



Get the perspective of your employees across all job levels



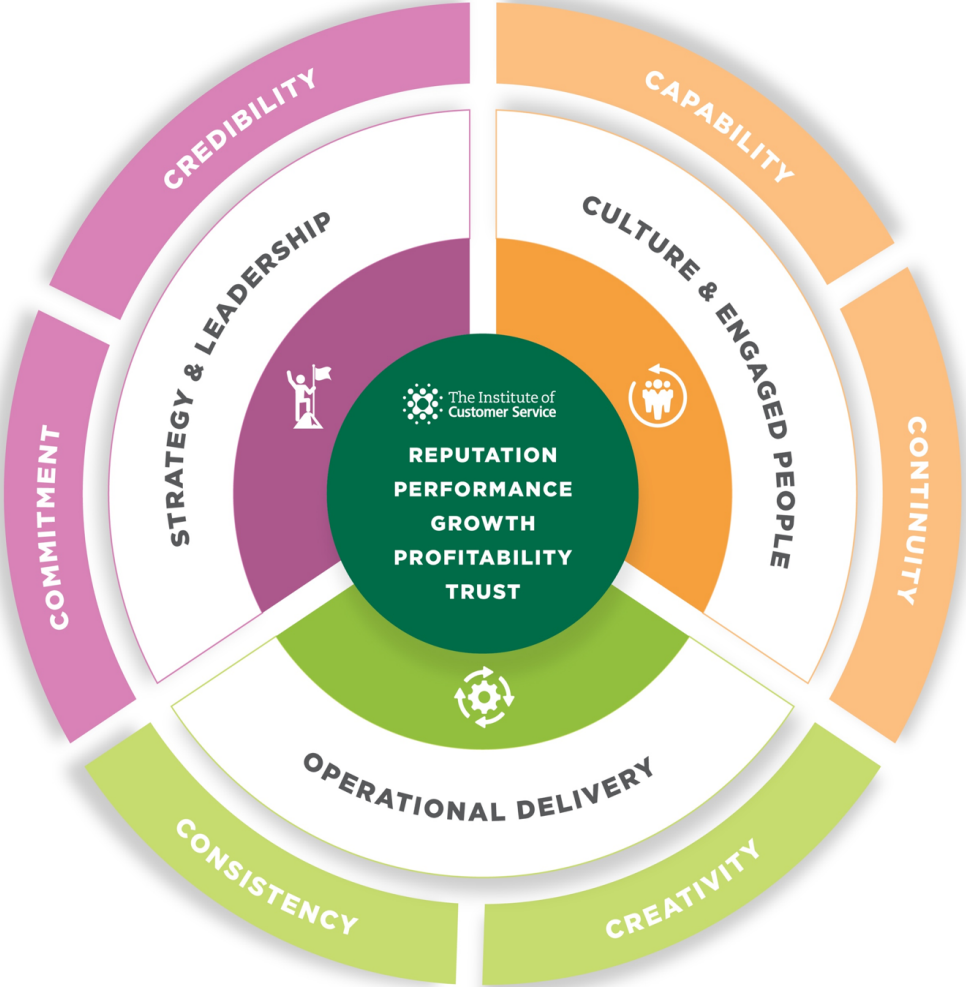
Use the results to develop a true service culture



ServCheck is one of the elements of ServiceMark, the national standard of customer service

The Service Experience Model

The Model is based on the premise that world-class service relies on a customer focused strategy leading to:



ServCheck Results Tower Hamlets Council December 2022

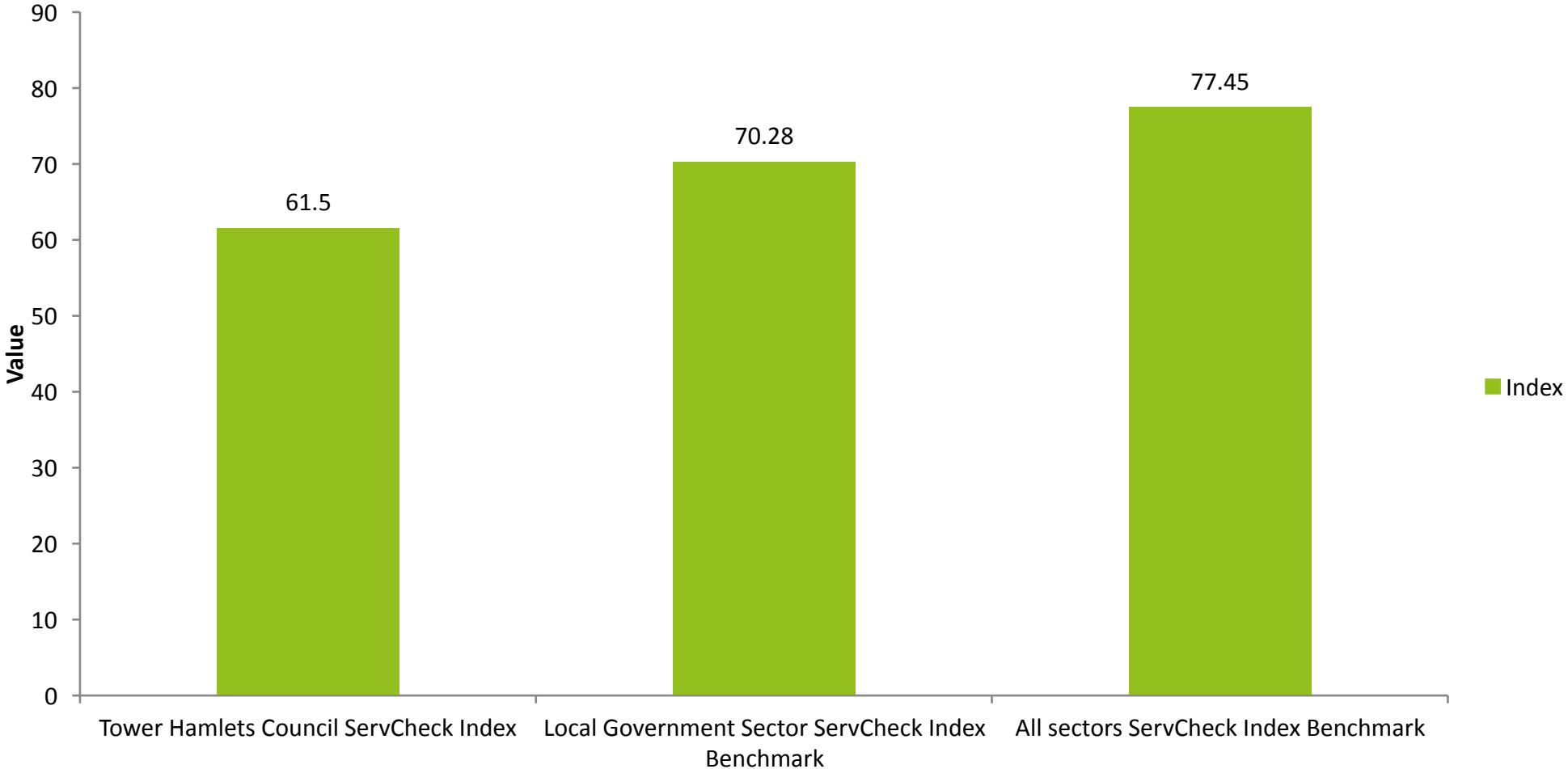


Employee Responses

65% completion - 330 out of 510 employees

Site	Senior Manager	People Manager	Non Manager	Total Staff
Tower Hamlets Council	20	85	225	330

Index Benchmark



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Top 3 questions

Top 3 questions	Tower Hamlets Council
1.1 My Line Manager believes that great customer service is important to our business performance	84.48
1.28 We have a clear escalation process for complaints	75.45
2.15 Our organisation values the diversity of its people	74.88

Bottom 3 questions

Bottom 3 questions	Tower Hamlets Council
1.16 Our people are rewarded based on customer satisfaction performance	36.30
1.13 Our organisation shares customer experience performance with key external stakeholders	43.27
3.17 Customers are involved in the development of new services	46.00

Top 10 don't knows

Question	Tower Hamlets Council	UK Average
1.13 Our organisation shares customer experience performance with key external stakeholders	43%	30.6%
1.6.3 My organisation does the right thing for: its suppliers	36.1%	-
3.17 Customers are involved in the development of new services	28.5%	24.1%
3.12 We have a suggestion scheme (or other system) for employees to put forward ideas to improve customer experience	27.6%	12.8%
1.16 Our people are rewarded based on customer satisfaction performance	26.1%	11.7%
3.18 We regularly learn service best-practice from other organisations inside and outside of our industry sector	24.5%	19.8%
1.21 Our organisation has a good reputation for customer service/experience	21.5%	5.9%
1.14 Our organisation shares customer experience performance with employees and customers	21.2%	6.5%
1.9 We measure what is important to our customers by measuring all key touchpoints/interactions across the service experience	21.2%	6.9%
1.6.1 My organisation does the right thing for: environmental sustainability	20%	-

External engagement

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Customer Service Survey for external service users, Oct 2022



- 30 responses
- Top three most contacted services: Parking, Council tax and Waste service
- Some experienced long waiting for phone calls (50% of the respondents, 8 min+) and emails (60%, 5 days+) to be answered.



Appendix 7

Customer Experience Strategy Survey Results

Let's Talk Tower Hamlets

The Customer Experience Strategy Survey was launched on 5 June and closed on 7 July.

18 Residents responded to the survey online via Let's Talk Tower Hamlets, which is much fewer than the commissioned survey conducted by SMSR. 1100 residents and 50 businesses took part in face to face and telephone consultation. The findings from this engagement exercise will be provided separately. The survey results via Let's Talk Tower Hamlets, compared with the SMSR, may give some insight.

Have you contacted the council in the last 12 months.

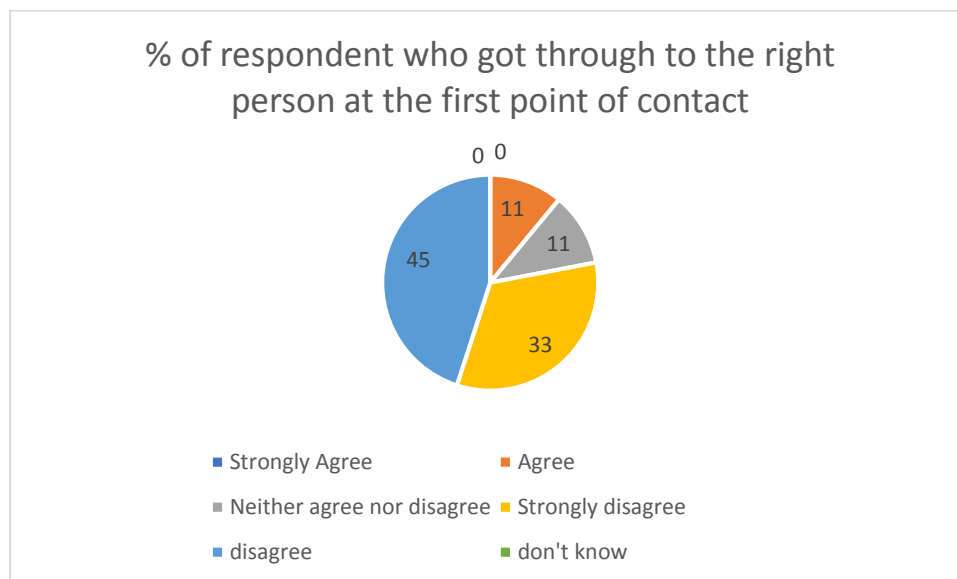
Of the 18 people who responded to the survey 17 people had contacted with the council in the last 12 months

If you contacted the council in the last 12 months, please tell us which services you contacted most.

The most contacted Services by the respondents were Waste and recycling and Highways and Street cleansing, 7 people contacted both services.

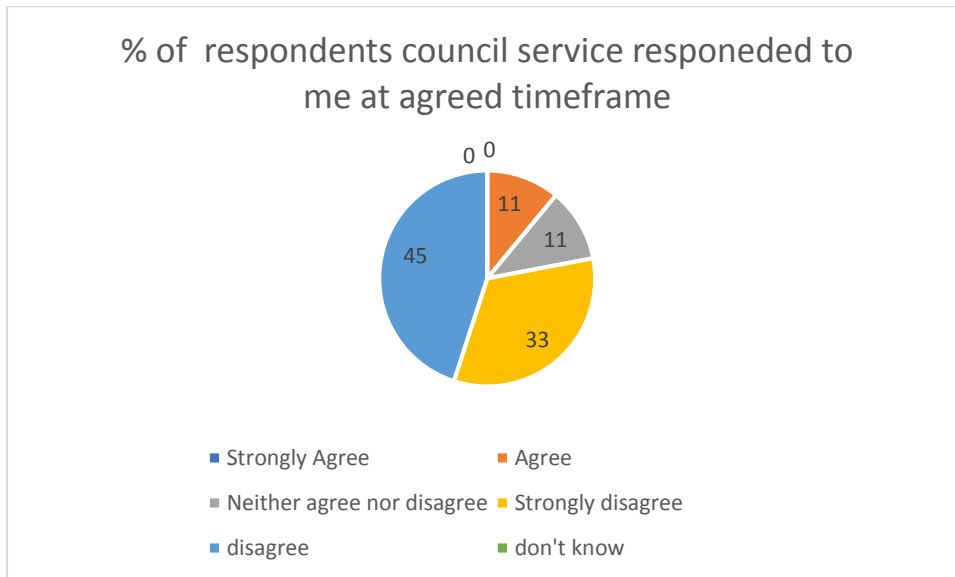
Thinking about your most recent experience with the council, please state to what extent you agree with the statements below.

Got through to the right person at the first contact.



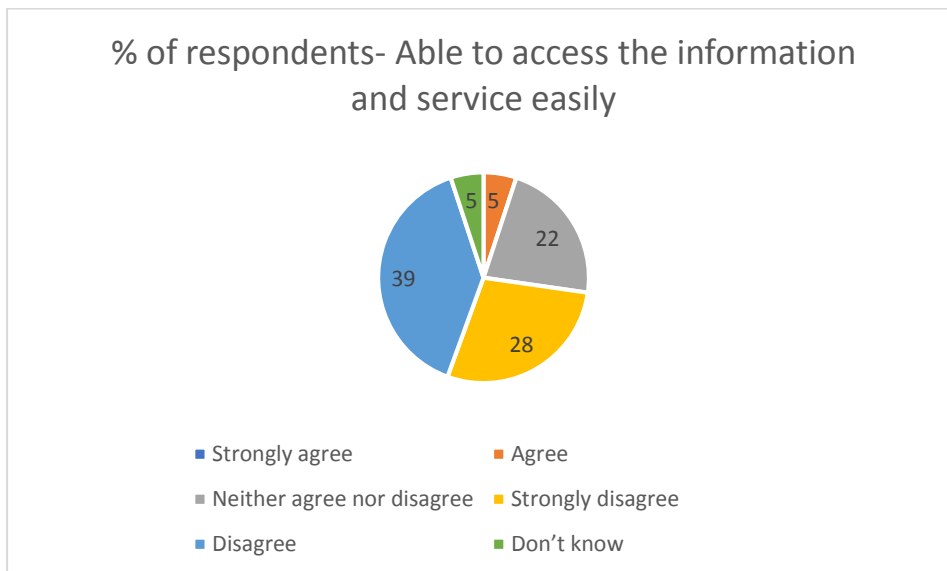
77% of respondents either strongly disagreed or disagreed that they were able to get through to the right person on the first contact.

Council service responded to me at the agreed timescale.



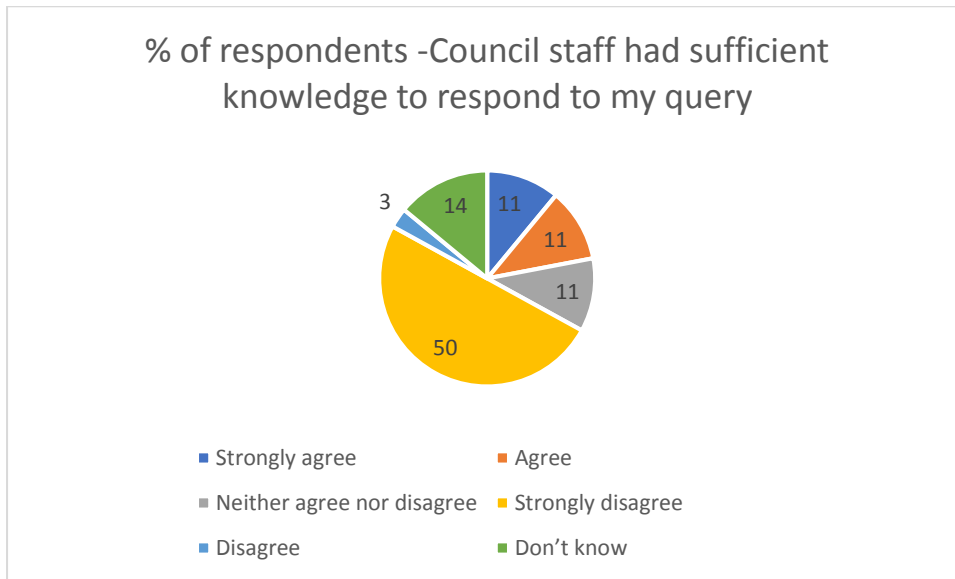
78% of respondents either strongly disagreed and or disagreed that the council responded at the agreed timescale.

Able to access the information and service easily.



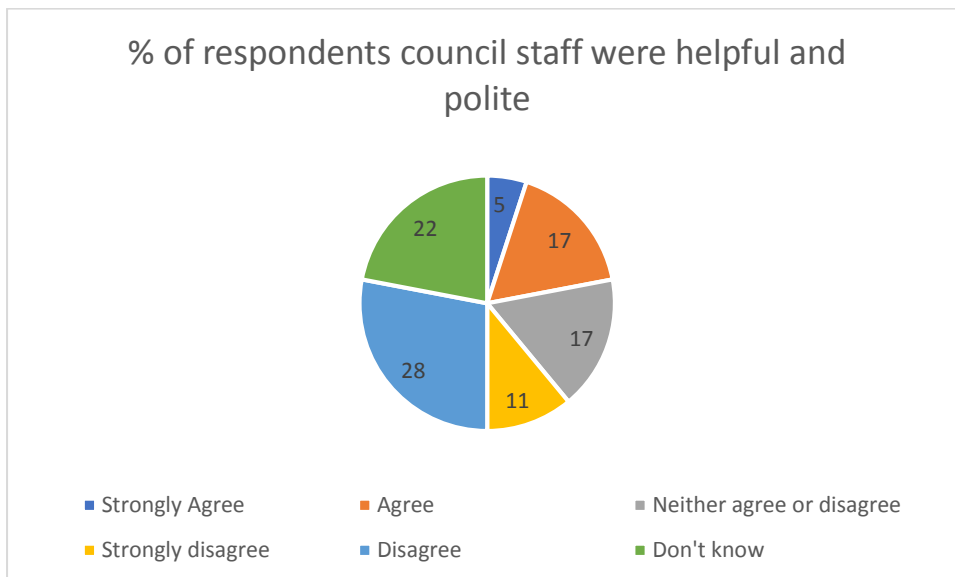
68 % of respondents either strongly disagreed or disagreed that they were able to access the information and services easily.

Council staff had sufficient knowledge to respond to my query.



Over half of respondents 50% stated that they disagreed that council staff had sufficient knowledge to respond to queries

Council staff were helpful and polite.



28 % disagreed with the statement that council staff were helpful and polite.

What is your preferred way to contact the council?

When asked about the preferred method to contact the council.

Method of contact	Average Method
In writing such as (writing a letter)	5.22
Via local Councillor, Mayor or MP	4.89
Face to face (such as visiting a council office)	4.39
Social Media	4.33
Through the council website (digital format)	3.39
Telephone	3.38
E-mail	2.50

If you would not choose to contact the council using our website/ online service, please tell us why?

6 of the respondents said they would not choose to contact the council using our digital options.

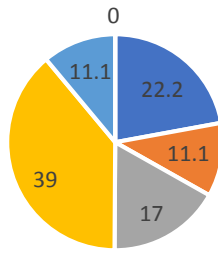
Respondents feedback on the main reasons for not using on-line services, are the difficulty in finding the right services and forms on the website and the lack of feedback/ communication to customers when making requests online.

About the Strategy

Please state to what extent you agree with the Customer Experience Strategy's vision below.

"Public service is at the heart of what we do. The council will listen and work collaboratively internally, with other agencies and in partnership with our voluntary and community services to design and deliver fit for purpose excellent services."

% of respondents Please state to what extent you agree with the Customer Experience Vision

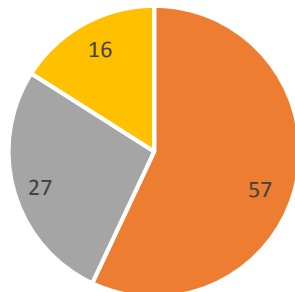


- Strongly agree
- Agree
- Neither agree nor disagree
- Strongly disagree
- Disagree
- Don't know

Please state to what extent agree with the Strategy's desired outcomes.

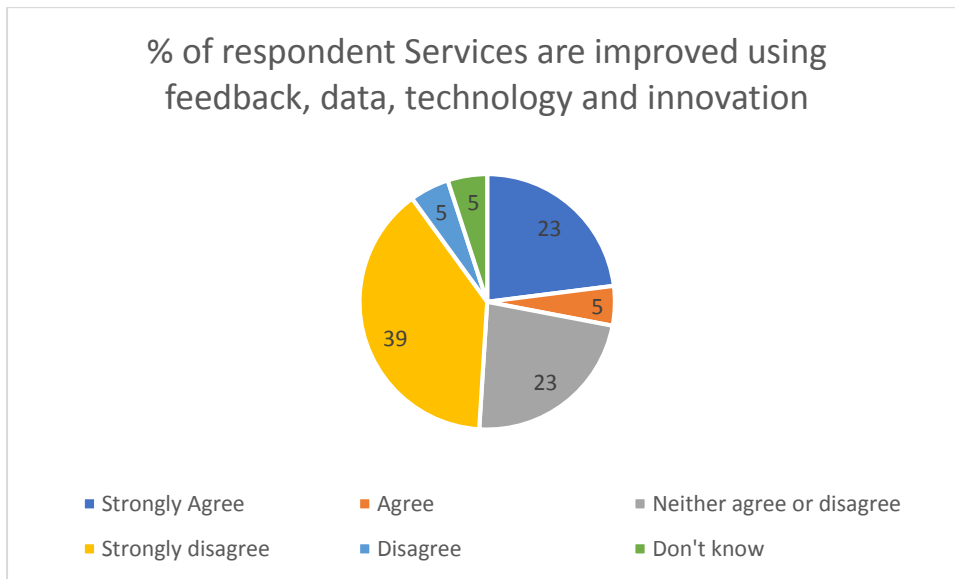
Council services are easily accessible and inclusive.

% of respondents Council services are easily accessible and inclusive



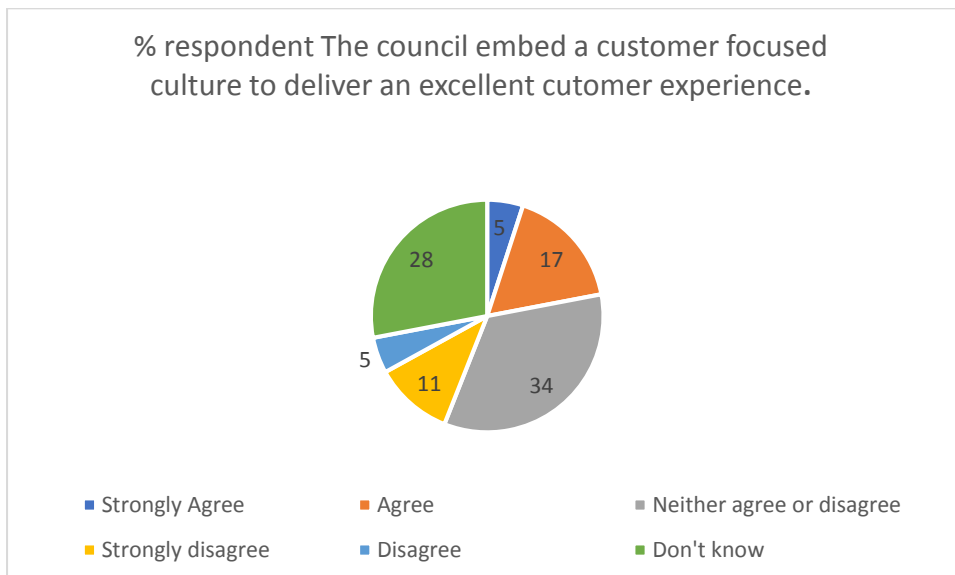
- Don't know
- Not at all
- Not very much
- To some extent
- A great deal

Services are improved by using feedback, data, technology and innovative.



39% of respondents strongly disagreed with the desired outcome to use feedback, data, technology and innovative, to improve services.

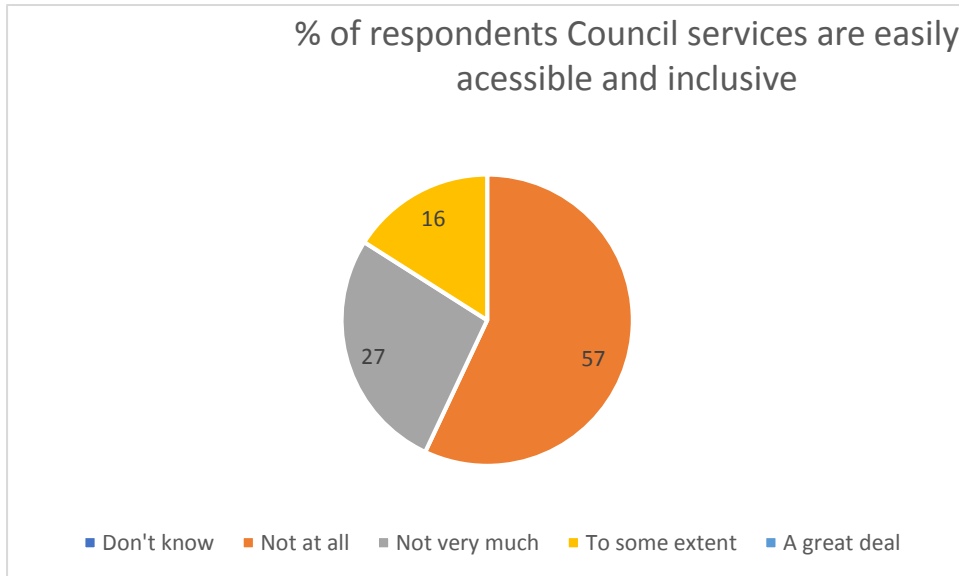
The council embed a customer focused culture to deliver an excellent customer experience.



34% neither agreed nor disagreed that the council embed a customer focused culture to deliver an excellent customer experience.

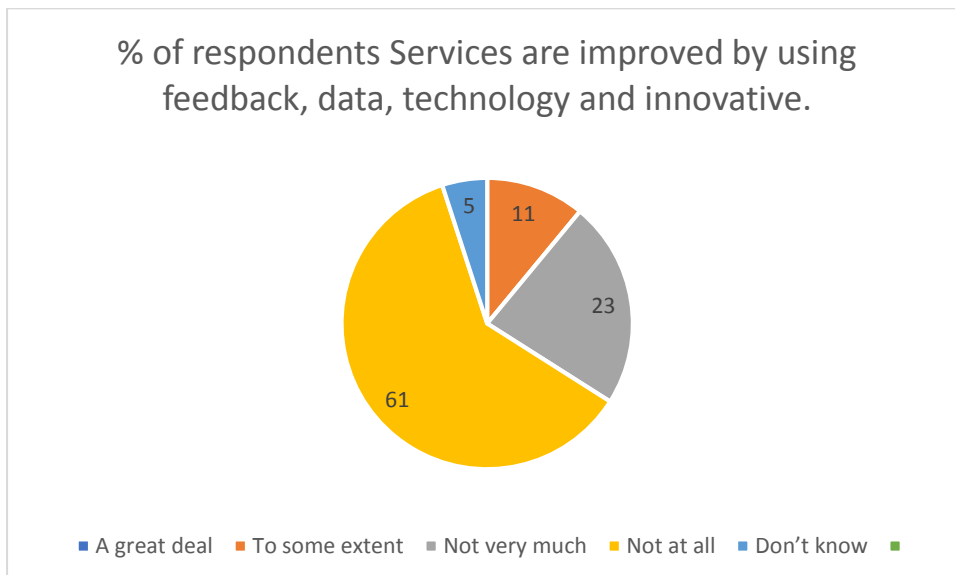
To what extent do you think Tower Hamlets Council currently meet these outcomes?

Council services are easily accessible and inclusive.



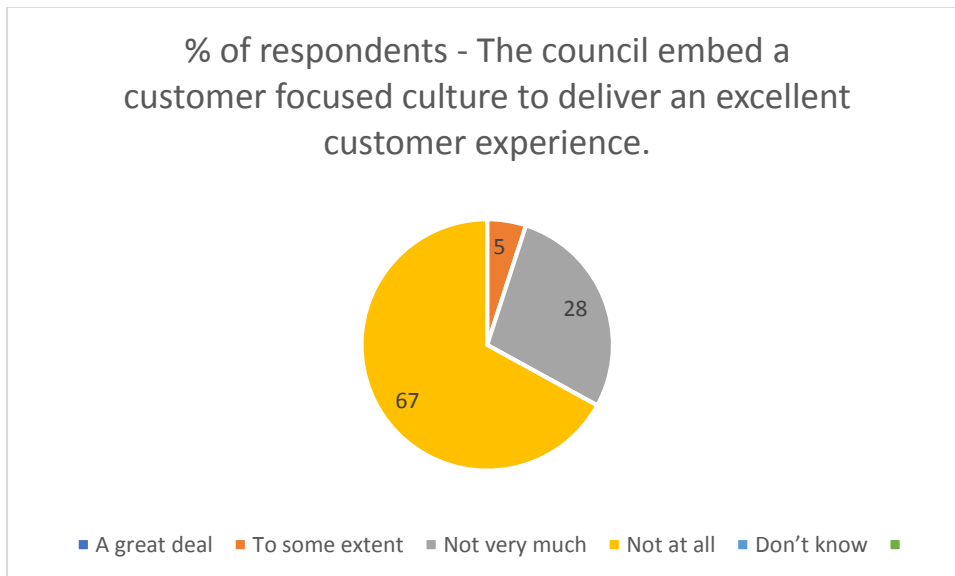
Over half of respondents 57% stated that the council is currently not meeting the desired outcome for easily accessible and inclusive council services.

Services are improved by using feedback, data, technology and innovative.



Over 60% of respondents stated that the council is currently not meeting the desired outcome to improve services by using feedback, data, technology, and innovation.

The council embed a customer focused culture to deliver an excellent customer experience.



Over 67% of respondents stated that the council is currently not meeting the desired outcome to embed a customer focused culture to deliver an excellent customer experience.

The table below summarise the respondents' comments on 'what additional outcomes should be included' All the comments are aligned with the outcomes and objectives in the draft strategy as per the table. Actions to improve these areas will be identified in an action plan.

Comments	Related outcomes and objectives
Improve contact via the telephone	Outcome two Objective 3: Ensure all customer service channels are effectively working.
Consistent service across all council departments	Outcome Three Objective 2: All staff have the knowledge and skills to deliver an excellent customer experience.
Improve the content on the website	Outcome One Objective 3: Ensure more services are available digitally.
Communicate and feedback to customer enquires	Outcome One Objective 4: Ensure all communication is relevant and timely.

Customer Promise

Our Customer Promise commits us to:

Put customers at the heart of everything we do.

Deliver services efficiently and effectively.

Deliver a high standard of service.

Regularly ask for feedback and use it to shape how we deliver services.

Provide consistently good customer service across all channels.

Be the best of Tower Hamlets as a customer-centric local authority.

By always:

Being helpful and polite.

Providing honest and accurate information.

Responding as quickly as possible.

Being clear and provide realistic time scales.

In return we ask that you:

Show respect and kindness to our staff and other customers.

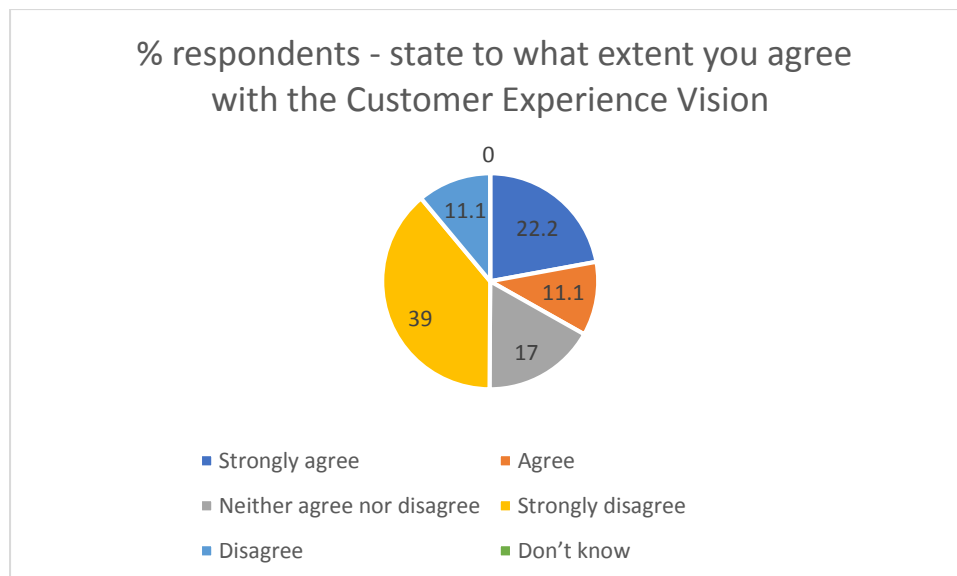
Let us know as soon as possible if your personal circumstances or requirements for a service change.

Provide us the correct information we need to assist you.


Engage with us in a way that supports our work and enhances the outcomes for everyone.

Share your feedback and suggestions on how we can improve our services.

To what extent do you agree that the Customer Promise conveys what our customers can expect from us and what we expect from our customers?



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<p>Cabinet</p> <p>20th September 2023</p>	 <p>TOWER HAMLETS</p>
<p>Report of: Communities Directorate</p>	<p>Classification: Unrestricted</p>
<p>Statement of Licensing Policy 2023 - 2028</p>	

Lead Member	Cllr Kabir Hussain – Lead Member Environment and the Climate Emergency
Originating Officer(s)	David Tolley, Head of Environmental Health and Trading Standards
Wards affected	All wards
Key Decision?	No
Forward Plan Notice Published	11/07/2023
Reason for Key Decision	Approval of the Statement of Licensing Policy is a decision reserved to full Council.
Strategic Plan Priority / Outcome	Boost culture, business, jobs and leisure

Executive Summary

As a Licensing Authority the Council must prepare and publish a Statement of Licensing Policy at least every 5 years. The Statement of Licensing Policy is required to be agreed at full and adopted by the end of November 2023. The purpose of the policy is to define how the responsibilities under the Licensing Act 2003 are going to be exercised and administered.

A statutory consultation process has taken place between the 19th January 2023 and 13th April 2023.

Subject to agreement the Policy will be presented to Full Council for adoption under the provisions set out by the Council’s Constitution

Recommendations:

The Mayor in Cabinet is recommended to:

1. Recommend to Full Council the adoption of the Statement of Licensing Policy at full Council which will take effect from 1st November 2023.

1 REASONS FOR THE DECISIONS

- 1.1 All relevant local authorities are required under the Licensing Act 2003 (“the Act”) to prepare and publish a statement of licensing policy at least every 5 years.
- 1.2 The purpose of the policy is to define how the responsibilities under the Act are going to be exercised and administered.

2 ALTERNATIVE OPTIONS

- 2.1 The Licensing Act 2003 places a statutory obligation upon the Council, as Licensing Authority, to determine and publish a statement of Licensing Policy. If the Council did not have a policy, it would likely be acting ultra vires with regards to any decisions it makes determining applications and notices under the Act.
- 2.2 The Secretary of State has issued guidance under section 182 of the Act. This details how licensing authorities discharge their functions under the Act. The Council must have regard to this guidance in carrying out its functions under the Act, including setting the Licensing Policy. Departure from the guidance without good reason could leave the Council at risk of judicial challenge.

3 DETAILS OF THE REPORT

- 3.1 The Council’s current Statement of Licensing Policy was adopted by Full Council in September 2018 and came into force on 1st November 2018.
- 3.2 The London Borough of Tower Hamlets is a Licensing Authority under the Act. We must determine and publish a statement of our licensing policy at least every five years.
- 3.3 In doing so, the Council must carry out the statutory consultation laid down in the Act. It is open to the Council to consult more widely.
- 3.4 Following consultation, Cabinet must consider the revised Statement of Licensing Policy and full Council must adopt the Statement of Licensing Policy.
- 3.5 The Licensing Act 2003 gives local authorities a range of responsibilities relating to premises licensing. The Statement of Licensing Policy states how the Council will exercise its authority.
- 3.6 This policy covers the following:
 - How the Licensing Authority will use its regulatory powers in relation to applications and reviews of the activities it regulates, to the extent it is allowed by statute.
 - The licensing objectives for the authority, which are set by legislative requirements.

- The Licensing Authority approach to regulation
 - The scheme of delegation
- 3.7 The Statement of Licensing Policy is prescribed by central government in its guidance to local Authorities, which is issued by the Secretary of State under section 182 of the Act. The current policy is compatible with this guidance.
- 3.8 The Statement of Licensing Policy 2023 – 2028 has been updated to take account of changes to relevant legislation and guidance over the last 5 years.
- 3.9 The statutory consultation requirements consists of :-
- The Chief Officer of Police for the Licensing Authority’s area.
 - The Fire and rescue authority for the Licensing Authority’s area.
 - Each Local Authority’s Director of Public Health (England).
 - Persons/bodies representative of local premises licence holders.
 - Persons/bodies representative of local club premises certificate holders.
 - Persons/bodies representative of local personal licence holders; and
 - Persons/bodies representative of businesses and residents in its area.

The full list of consultees is detailed in **Appendix One**. Letters were sent to all Premises, Club Premises Certificate and Personal Licence Holders.

- 3.10 A table of changes can be found in **Appendix Two** and the revised policy for adoption is detailed in **Appendix Three**.
- 3.11 A printout of the consultation document and survey questions can be found in **Appendix Four**. A report of the consultation survey can be found in **Appendix Five**.
- 3.12 The consultation survey was completed by 101 people, although there were 198 visits to the consultation site page. Most consultees agreed with the revised policy. However, this was not the case with respect to restrictions on the use of beer gardens or similar areas after a certain time and where the use of such area could result in public nuisance. The consultation sought views on the addition of conditions to cease the use of any outside areas after 9pm, where that was appropriate and proportionate to promote the licensing objective of prevention of public nuisance. The result from the online survey shows only 10% in favour of this time. The majority were in favour of a 10pm (29%) or 11pm (34%) cut-off time for the use of outside areas.

The 9pm restriction for outside areas is the same restriction placed upon Pavement Licences within the borough. The later was decided in consultation with the Council’s Environmental Health – Noise Team in the interest of preventing public nuisance. They also support the draft policy’s view of a 9pm restriction for outside areas. The draft policy has not been amended in respect of the proposed time for use of outside areas notwithstanding the above survey results. It should be noted that each premises licence or variation application will be considered on its individual merits.

3.13 The main changes to the policy are detailed below. These were considered during the consultation process:

- a) Addition of "Equality and Inclusion in Licensed Venues" section.
- b) Addition of Representations by Other Persons section to cover disclosure of personal details.
- c) Nitrous Oxide (NOx) - addition of conditions to be considered, where appropriate, to require refusal of entry/service to those using NOx.
- d) Drinks Spiking - guidance for applicants and licence and additional conditions to be consider, where appropriate, to prevent drinks spiking.
- e) Welfare and Vulnerability and Engagement (WAVE) - expectation that licences for alcohol for consumption on premises train staff in WAVE.
- f) Sexual Harassment in the Night Time Economy - encourage licence holders to sign up to Women's Night Safety Charter and refuse entry/service in the event of an act of misogyny, encourage applicants to discuss applications with the Councils VAWGs Team.
- g) Beer Gardens/outside areas - where issues are known, or suspected areas may be restricted after 9pm.
- h) Party Boats - addition of conditions applicants for party boats are expected to adopt.
- i) Online deliveries - conditions to be added where appropriate in relation to applications that include online alcohol sales.
- j) Clear expectation for applicants for early engagement with Environmental Health Noise and Police for Temporary Event Notices (TENs).
- k) Request that Risk Assessment be supplied with a Temporary Event Notice.
- l) Addition of expectation for applicants to add correct address for licence holder(s) including emails, and for licenced holder to notify Licensing where details change.

3.14 Some further changes were made to the draft Policy as a result of the consultation responses. These are summarised below:

- Encouragement for licence holders to sign up to the Tower Hamlets No Place for Hate (NPFH) Campaign.
- Paragraph added in reference to Martyn's Law and the ACT e-learning.
- Update to Prevention of Public Nuisance section, in view of providing what applicants should consider in their application to reduce any impact on residents.
- Creation of a Model Conditions Appendix,
- Changes to risk assessments wording as requested by the Metropolitan Police.

Copies of the written responses received can be found in **Appendix Six**.

3.15 An Equalities checklist has been undertaken as is at **Appendix Seven**.

4 EQUALITIES IMPLICATIONS

- 4.1 The Equalities Impact Assessment has been reviewed in respect of this policy and no specific impacts have been identified. An additional section “Equality & Inclusion in Licensed Premises has been added to address the Public Sector Equality Duty and to link to the Council’s Equality Policy.
- 4.2 The policy states the types of criminal activity that may arise with licensed premises which the Licensing Authority will treat particularly seriously that relate to children and young people. This includes illegal purchase and consumption of alcohol by minors which impacts health, educational attainment, employment prospects and propensity for crime of young people; relating to grooming children; and relating to criminal activity particularly relating to gangs.
- 4.3 More females than men are prone to sexual harassment in the night-time economy. The policy sets out our expectations of licence holders relating to sexual harassment in the Night Time Economy by encouraging licensed venues to sign up to the Mayor of London’s Women’s Night Safety Charter. As well as the Women’s Night Safety Charter we encourage applicants and license holders to discuss applications with the Council’s Violence Against Women and Girls Service, who can provide advice and training to venues on preventing misogyny within licensed premises. In addition, license holders are expected to take a zero-tolerance approach misogyny within their venues where this is towards customers or employees. In practice this means that they are expected to refuse to serve persons who commit acts of sexual harassment, even in the first instance, and report the matter to the Metropolitan Police. The policy states that it is expected that all licensed venues which sell alcohol for consumption on their premises should train their staff in WAVE and adopt Ask for Angela or similar initiatives aimed at assisting vulnerability within alcohol licensed venues.
- 4.4 Females and gay men are more prone to drinks spiking than other groups. A YouGov poll in 2022 identified that nationally 10% of females said they had their drink spiked compared to 5% of males. 48% of those aged between 18-24 said they have had a drink spiked or know someone who has. However, it is those aged between 25 and 49 who are the most likely to say they have personally had a drink spiked (11%).
- 4.5 The policy makes an expectation on licence holders and applicants to have a zero-tolerance policy towards drinks spiking. This involves as a minimum ensuring all reports of spiking are acted upon and that all incidents of alleged spiking are recorded and reported to the police. Applicants for new and variations of exiting licences as well as those submitting TENs are expected to work with the Metropolitan Police in order to consider actions needed to prevent drinks spiking in their venues/events.
- 4.6 Teenagers and young adults are more likely to use psychoactive substances such as nitrous oxide (NOx). Misuse of nitrous oxide is associated with increased antisocial behaviour including littering, noise nuisance and vandalism, all of which are detrimental to residents’ quality of life and feelings of safety. Use of nitrous oxide is also a health concern and has other associated harms. The

policy places an expectation on license holders to refuse entry to any person seen using or selling NOx as a psychoactive substance. Refusals should also be entered into license holder's refusals logs. Please note since this policy was drafted, the Government has announced its intention to bring NOx within the control of the Misuse of Drugs Act 1971.

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.
- 5.2 Best Value: The Licensing Policy details the regulatory approach to the Council's functions under the Licensing Act 2003. The fees imposed for the licence/notices are set by government. The fees cover the cost of regulating and administering the borough's functions under the Act.
- 5.3 Crime Reduction: One of the key licensing objectives is to prevent of crime and disorder. The policy supports and assists with crime and disorder reduction by controlling those who manage premises open to members of the public and imposing conditions on relevant premises licences.
- 5.4 Safeguarding: The Statement of Licensing policy takes into account of safeguarding children and violence against women and children.
- 5.5 Risk Management: There are no risk management issues with the revised policy or the consultation process.
- 5.6 Environmental and consultation implications: There are no negative environmental impacts about this policy or the consultation process.

6 COMMENTS OF THE CHIEF FINANCE OFFICER

- 6.1 This report is seeking approval to adopt the Statement of Licensing Policy to cover the period 1st November 2023 until 31st October 2028. There are potential financial implications emanating from this report with regards to the introduction of the changes highlighted in paragraphs 3.13 and 3.14. The full financial implications are not envisaged to be material. The Service is funded by the licence application fees and it is anticipated that this will be sufficient to cover the additional cost. The Service will utilise the annual budgeting process if required.

7 COMMENTS OF LEGAL SERVICES

- 7.1 The Council is a licensing authority by virtue of s.3 of the Act. S.5(1) requires the authority to determine and publish its Statement of Licensing Policy ("the Policy") in respect of each five-year period. During the period in which the

Policy is in force, the authority may review the Policy and make such revisions, if any, as it thinks appropriate.

- 7.2 Prior to determining the Policy, the authority must consult the bodies or persons specified in s.5(3). This has been complied with, as specified in paragraph 3.9 (above) and Appendix 1.
- 7.3 The principles of effective consultation require that: consultation be carried out when proposals are at formative stage; the consultees must be given sufficient and accurate information and reasons so as to be allow for proper consideration; adequate time be given for responding; the fruits of the consultation must be conscientiously taken into account when making the decision.
- 7.4 All licensing authorities must carry out their functions with a view to promoting the four licensing objectives, namely: the prevention of crime and disorder; the prevention of public nuisance; public safety; the protection of children from harm. In carrying out those functions it must also have regard to any guidance issued by the Secretary of State under s.182 of the Act and to the Policy.
- 7.5 S.5(6D) provides that in determining or revising its policy, the authority must have regard to any cumulative impact assessments (CIAs) published by it under s.5A of the Act. Such assessments apply in respect of any area where the authority considers that the number of relevant authorisations in respect of premises in the area is such that it would be inconsistent with its duty to grant any further authorisations in respect of premises in that area. This then creates a rebuttable presumption in favour of refusal of any relevant applications unless the applicant shows that they will not adversely impact upon the licensing objectives. Any such CIA must be reviewed at least every three years.
- 7.6 The Council currently has two such CIAs, in respect of Brick Lane and Bethnal Green. These were approved by the Council on 17th November 2021 and took effect on 18th November 2021. The Policy contains those cumulative impact assessment statements.
- 7.7 Section 149 of the Equality Act 2010 requires the authority, in the exercise of its functions, to have due regard to the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the 2010 Act, to advance equality of opportunity between persons who share a relevant protected characteristic and those who do not, and to foster good relations between those who share a relevant protected characteristic and those who do not. The relevant protected characteristics are age; disability gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation. The duty must be complied with at the time that the decision under consideration, in this case the recommendation to adopt the Policy, is taken. It is not a duty to achieve a particular result.
- 7.8 The decision to approve the Policy is expressly stated in the Local Authorities (Functions and Responsibilities) (England) Regulations 2000 as being a function that cannot be the responsibility of the executive. The Full Council

must decide to approve the Statement. Cabinet only has power to recommend the Policy to full Council for a decision to be made on adoption.

Appendices

- Appendix One: List of Consultees
- Appendix Two: Statement of Licensing Policy review – Table of Proposed Changes
- Appendix Three: Proposed Statement of Licensing Policy 2023 - 2028
- Appendix Four: Printout of Consultation Document and Survey Questions
- Appendix Five: Online Consultation Report (redacted)
- Appendix Six: Written consultation responses (redacted)
- Appendix Seven: Equalities Impact Checklist

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

None

Officer contact details for documents:

N/A

Appendix: One

Statement of Licensing Policy Review Consultation - List of Consultants

1. Met Police – Detective Chief Superintendent, Tower Hamlets
2. Director of Public Health, London Borough of Tower Hamlets
3. London Fire Brigade
4. All Licensees holding a Premises License or Club Premises Certificate
5. All Holders of Personal Licensed with the London Borough of Tower Hamlets
6. Deputy Mayor for Policing and Crime (MOPAC)
7. Trading Standards, Environmental Health and Trading Standards, London Borough of Tower Hamlets
8. Environmental Protection, Environmental Health and Trading Standards, London Borough of Tower Hamlets
9. Licensing and Safety Team, Environmental Health and Trading Standards, London Borough of Tower Hamlets
10. Child Protection, London Borough of Tower Hamlets
11. Development Control, London Borough of Tower Hamlets
12. Tidal River Thames Port of London Authority
13. Navigation Authority Canal & River Trust
14. Health and Safety Executive (HSE)
15. London Legacy Development Corporation
16. Maritime & Coastguard Agency
17. Home Office Immigration Enforcement
18. Ezra Street Residents Association
19. Spitalfield Residents Association (SPIRE)
20. St Georges Residents Association
21. Arts Parks and Events, London Borough of Tower Hamlets
22. Community Safety, London Borough of Tower Hamlets
23. Growth & Economic Development, London Borough of Tower Hamlets
24. Safety Guarding, London Borough of Tower Hamlets
25. MASH (Child Safe Guarding), London Borough of Tower Hamlets
26. Children and Culture Services, London Borough of Tower Hamlets
27. Asset Management, London Borough of Tower Hamlets
28. Democratic Services, London Borough of Tower Hamlets
29. Legal Services, London Borough of Tower Hamlets
30. Violence Against Women and Girls (VAWG) Team, London Borough of Tower Hamlets
31. Adult Care, London Borough of Tower Hamlets
32. Institute of Licensing (IoL)
33. Council of Mosques
34. National Society for the Prevention of Cruelty to Children (NSPCC)
35. NHS Tower Hamlets Clinical Commissioning Group
36. Young Mayor, London Borough of Tower Hamlets
37. The Environment Agency
38. London Borough of Hackney Licensing Team
39. London Borough of Southwark Licensing Team
40. City of London Licensing Team
41. London Borough of Lewisham Licensing Team
42. Royal Borough of Greenwich Licensing Team
43. London Borough of Newham Licensing Team
44. Maritime & Coastguard Agency
45. The Environment Agency
46. The Canal and River Trust, London

47. Antisocial Behaviour and Neighbourhoods Team, London Borough of Tower Hamlets
48. Licensing Committee Members, London Borough of Tower Hamlets

Media Consulted

1. Facebook
2. Twitter
3. Members Bulletin

Statement of Licensing Policy Review – Proposed Changes 2023 - 2028

Please note the changes to the Policy detailed below.

Section/Page	Addition/Deletion	Rationale
All	Amend all references to licensing authority: Licensing Authority	Licensing Authority should be in capitals at start of each word.
Page 1	Add: Front page with LBTH Logo and “ <i>Effective 1st November 2023</i> ” then “ <i>The London Borough of Tower Hamlets, STATEMENT OF LICENSING POLICY 2023 – 2028</i> ”	Current policy has now front page.
Page 2	New Contents Page Change para numbers where needed to reflect additions/deletions.	To reflect changes, note the numbers are added as if the deletions have been removed.
Page 3	Para 7: Replace “vision” with “ <i>Strategic Plan</i> ”	Update
Page 3	Para 8: Delete: “The four major themes that the Council has set out in the Tower Hamlets Partnership’s Community Plan by means of which the vision is delivered are: A Great Place to Live A Fair and Prosperous Community A Safe and Cohesive Community ”	Update for new Council Strategy.

	<p>A Healthy and Supportive Community</p> <p>You will find there is more detailed information about the four themes, and how they support One Tower Hamlets at: http://www.towerhamlets.gov.uk/lgnl/community_and_living/community_plan/strategic_plan.aspx”</p> <p>Replace with: <i>“The Plan has 8 priorities and is the council’s main plan, which details the most important priorities for the council between 2022 and 2026. These priorities are translated from the Mayor’s vision into the strategic Plan.</i></p> <p>You will find there is more detailed information about the eight priorities: https://www.towerhamlets.gov.uk/lgnl/community_and_living/community_plan/strategic_plan.aspx”</p>	
Page 4	Para 1.1, para 3 Replace “on the 6 th April 2017” with “ <i>in December 2022</i> ”	New Guidance
Page 5	<p>After para 3.5 Add: “4 <i>Equality and Inclusion in Licensed Venues</i></p> <p><i>4.1 As per Tower Hamlets Equality Policy, we want Tower Hamlets to be a place where people have equal access to opportunities and where inequality is actively tackled. Tower Hamlets Equality Policy recognises that this can only be done by working with our partners to advance equality, promote good community relations and tackle discrimination. The Council believes that diversity of our community is one of our greatest strengths and assets. We value the strength that comes with difference and the positive contribution that diversity brings to our community. This includes achieving equality and inclusion in all that we do, to improve the quality of life and</i></p>	Addition of Public Sector Equality, and links to Statement of Licensing Policy. Also, what the expectation of applicants and licence holders in regards to equality.

	<p><i>opportunities for all people who live, work, and visit the borough. The Equality Policy seeks to embed equality throughout the council's plans, services and activities to ensure it is a key driver for everything we do. As a Licensing Authority we want to do all that we can do to ensure our borough is open and accessible to all.</i></p> <p><i>4.2 It is unlawful for any venue to discriminate against anyone based on race, sex, sexual orientation, age, or any of the protected characteristics under the Equality Act 2010. In our view equality and inclusion extends beyond this definition within the 2010 Act. Any type of discrimination be it intentional or subconscious is inherently damaging for the individual, our wider community and our economy. Moreover, it actively harms the interests of licensed premises and the licensed industry.</i></p> <p><i>4.3 Tower Hamlets is a diverse and culturally rich borough. It is a microcosm of London and has the fastest population growth in the country because we are a very special place and people want to live and work here. We have always been a gateway for people of all backgrounds to come and better themselves. As part of London's east end, we are enriched by the significant contributions made by a diversity of communities and migrant groups and boast a proud history of collective action against racism and bigotry. Altab Ali Park is an iconic area in the borough that speaks to the richness of this history. Yet, it is only one of the many Parks that has historical importance within the borough, many of which are often used to host small community events to large music festivals. We want to celebrate and build on this, which means we need to hold ourselves, as well as the venues and businesses we licence to account to ensure that together we continue to promote and offer equal opportunities and inclusive experiences for everyone.</i></p> <p><i>4.4 Duties as a License Holder to Equality</i></p>	<p>Addition of Tower Hamlets Not Place for Hate Campaign as requested by Community Safety</p>
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Applicants and licensees must make themselves familiar with the law and their responsibilities set out within the Equality Act 2010 and relevant guidance for businesses, which can be found on the Equality & Human Rights Commission website. The 2010 Act makes discrimination against any person (including employees and customers) unlawful. The 2010 Act defines the relevant protected characteristics as age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. Any activity in breach of the 2010 Act may be considered an offence and will lead to enforcement by the Equality and Human Rights Commission.

As part of Tower Hamlets No Place for Hate (NPFH) Campaign we would encourage all licence holders and new applicants to sign our Organisational pledge against hate. Organisations who sign this pledge are published on the website. This helps promote equality within our borough.

https://www.towerhamlets.gov.uk/lgnl/community_and_living/community_safety_crime_preve/hate_crime/organisational_pledge.aspx

4.5 Public Sector Equality Duty

The Council must have regard to its public sector equality duty under the 2010 Act. In summary a Public Authority must, in the exercise of its functions, have due regard to the need to:

- eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under this Act.*
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.*
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.*

	<p>4.6 <i>Expectation on Licence holders and applicants to equality and inclusivity</i> <i>There is no one size fits all approach to making a venue inclusive, and each operator will need to make an assessment of its own practices and policies. However, the following are common and best practice examples that could be adopted:</i></p> <ul style="list-style-type: none"> • <i>Inclusive and transparent policies (for example, admittance policies may clearly stipulate adherence to a dress code and refusal if there are concerns about a customer; however, they must not prevent admittance based on any of the protected characteristics).</i> • <i>Robust complaints procedures that make it easy for customers who feel they have been discriminated against to raise their concerns and understand how this will be investigated or managed.</i> • <i>Accessible venue layouts that make venues welcoming.</i> • <i>Comprehensive training on equality and inclusion for all staff, which is regularly refreshed.</i> <p>4.7 <i>Using the Licensing Process to promote equality and inclusivity</i></p> <p><i>This Authority will use the Licensing Process to ensure both Operators and the Council are compliant in carrying out their legal obligations. This includes:</i></p> <ul style="list-style-type: none"> • <i>Providing pre-application advice to applicants.</i> • <i>Determining licensing applications and reviews.</i> • <i>Making representations as a responsible authority.</i> • <i>Applying for reviews in appropriate circumstances.</i> • <i>Defending appeal decisions</i> <p><i>In essence this means that the Council through this licensing process will identify applicants that do not provide sufficient information on how they are promoting equality and inclusivity and could make a representation to require that the</i></p>	
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	<p><i>applicant address the issue or explain to members of the Licensing Sub-Committee why they have not done so.</i></p> <p>4.8 Tower Hamlets Commitment to Equality and Inclusivity</p> <p><i>Over the duration of this Statement of Licensing Policy Tower Hamlets as a Licensing Authority will:</i></p> <ul style="list-style-type: none"> <i>• Ensure that any strategy or policy affecting the licensed industry is always underpinned by the promotion of equality and inclusivity.</i> <i>• Provide where possible advice and support to Licence Holders and Applicants on promoting equality and inclusivity by signposting them to internal and external bodies that can provide expert guidance.”</i> 	
Page 7 (10 on reviewed Policy)	<p>Delete Paras 4.13 and 4.14 (now 5.13 and 5.14) and replace with below paras:</p> <p><i>“This Licensing Authority will ensure that any conditions added to a licence/authorisation are enforceable and proportionate and are consistent with the general principles for licence conditions detailed the Secretary of State’s Guidance. We encourage applicants’ responsible authorities and other persons to have regard to this Guidance when considering additional conditions. We also encourage the use of words such as “must”, “shall” and “will” when deciding the wording of any condition.</i></p> <p><i>Licensing laws are not the primary method of for general control of nuisance and anti-social behaviour by individuals once they are away from any licensed premises, thus being beyond the direct control of the Licensee/Certificate holder or holder of any other such authorisation (e.g. Temporary Event Notice). However, it is a key aspect of control and licensing laws will always be part of an overall approach to the management of the evening and night time economy.”</i></p>	Update as per Home Office Guidance, and to give better clarity on wording of conditions.

Page 8 (11 on reviewed Policy)	Delete para 4.16 and 4.17. Add: below para (to become para 5.16): <i>“Given the restrictions place upon the licensed trade during the pandemic we recognise the importance and positive benefits that the licensed trade brings to the Borough. This includes not just social benefits for customers, but jobs and associated regeneration, as well as the benefits to the arts in respect to music, dance and other entertainment, all of which celebrates the rich mixture of cultural diversity and creativity that exists within Tower Hamlets.”</i>	Paras redundant. Recognition of Licensed Trade’s benefit to Borough.
Page 8 (11 on reviewed Policy)	After para 4,18 (now 5.18) add new Para: A list of responsible authorities can be found in Appendix 1. However, an up-to-date list of Responsible Authorities with contact details can be found here: https://www.towerhamlets.gov.uk/lgnl/business/licences/alcohol_and_entertainment/Responsible-Authorities.aspx	Ensure Licence holders and applicants are directed to correct up to date information.
Page 8 (11 on reviewed policy)	Para 4.19 (now 5.19) consulting on whether this is still needed or if it should it be kept at 40 metres, or decreased to 30 metre, or increased to 50 metres Para 4.21 (now 5.21) amend paras detailed here to reflect change in para numbering	Consultation found 42.3% of 101 responses to the survey wanted to keep this voluntary consultation as it is – the para will therefore remain as 40 meters.
Page 10 (13/14 on reviewed Policy)	Para 6.2 (now 7.2) after the words “premises licences” Add: “(where the applicant is an individual)” Para 6.3 (now 7.3) Delete: “Those applying”. Add: “Applications”.	Changes as per Home Office Guidance December 2022

	After the word “premises” add: “(where they are an individual)”	
Page 11 (14 on reviewed Policy)	<p>Para 6.4 (now 7.4) after the words “Annex A” delete “the Secretary of State’s Guidance”. Add: “<i>the Home Office’s Employer right to work checks supporting guidance (https://www.gov.uk/government/publications/right-to-work-checks-employers-guide)</i>”</p> <p>After words “that they have” Delete “permission to be in”. Add: “<i>the right to work in</i>”</p> <p>At the end of the para Add: “<i>As an alternative to using one of the documents listed in the above guidance, applicants may choose to demonstrate their right to work by allowing this Licensing Authority to carry out a check with the Home Office online right to work checking service. As a result, we invite applicants to provide their shared code in their application. This code along with the applicant’s date of birth allows this Licensing Authority to check their immigration status via the online service (https://www.gov.uk/view-right-to-work).</i>”</p>	Changes as per Home Office Guidance December 2022
Page 11 (15 on reviewed Policy)	<p>After para 6.7 (no 7.7) Add:</p> <p>“</p> <p>8. <i>Representations by “Other Persons”</i></p> <p>8.1. <i>Other person includes any individual, body or business.</i></p> <p>8.2. <i>Representations against or for an application must be in writing, either by post or email. For it to be considered as a valid representation it must:</i></p> <p>a) <i>Be “relevant”, in that it states the reasons for making the representation, which must include how the proposed licence will have an effect or potential effect of the on one or more of the four licensing objectives (see section 5</i></p>	Give clarity to Other Persons making Representations

	<p>above),</p> <p>b) <i>Include name and full postal address of the person making the representation (Anonymous representations will not be accepted).</i></p> <p>c) <i>Not be frivolous or vexatious (i.e. concerns issues which, at most, are minor and in relation to which no remedial steps would be warranted or proportionate; or appears to be intended to cause aggravation or annoyance, whether to a competitor or other person, without reasonable cause or justification).</i></p> <p>8.3. <i>Other persons can also request a representative to make the representation on their behalf. A representative may include a legal representative, a friend, a Member of Parliament, or a local councillor who can all act in such a capacity. In such cases all dialogue and correspondence will be with the Representative.</i></p> <p>8.4. <u><i>Representations and Disclosure of personal details</i></u></p> <p><i>Once a valid representation is received unless it is withdrawn by the person/body etc. making the representation the decision on whether to grant the licence/authorisation must be referred to the Licensing Sub-Committee. The Licensing Authority when giving a notice of a hearing to an applicant, is required under the Licensing Act 2003 (Hearings) Regulations 2005 to provide the applicant with copies of the relevant representations that have been made.</i></p> <p><i>The Licensing Authority must provide all representations to the applicant unredacted as required by the above legislation. The only exception to this is where licensing authorities consider that the person who has made the</i></p>	
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	<p><i>representation has a genuine and well-founded fear of intimidation. In such circumstances the Licensing Authority will follow the Secretary of State's Guidance and the House of Commons Briefing Paper, dated 6th July 2018: Alcohol: objecting to a licence. In these circumstances the Licensing Authority may decide to withhold some or all of the person's personal details from the applicant, giving only minimal details (such as street name or general location within a street). However, withholding such details will only be considered where the circumstances justify such action."</i></p>	
Page 11/12 (16 on reviewed Policy)	<p>Para 7.2 (now 9.2) after the sentence ending "licensing objective." Delete next sentence, which begins "Such steps as...". Replace with: <i>"The applicant should also list such steps that are required to deal with these identified issues. Both risks and mitigating steps should be included within the applications operating schedule."</i></p>	Requested by Met Police in consultation response.
Page 12 (17 on reviewed Policy)	<p>Para 7.7 (now 9.7) at the end of the second para after the "condition" Add and "s" to condition, and then Add "<i>from our model conditions in appendix 2, to</i>". Then Delete "that", and the "s" from "prohibits", and then delete "as follows" sub paras 1) and 2).</p>	Move conditions to Appendix 3 – Model Conditions.
Page 13 (17 - 19 on reviewed Policy)	<p>After para 7.8 (now 9.8) Delete "Model Pool Conditions can be found in the Secretary of States Guidance."</p>	No longer contain in Home Office Guidance.
Page 13 (17 on reviewed Policy)	<p>After para 7.8 (now 9.8) Add below Paras: <i>"Psychoactive Substances, e.g. Nitrous Oxide (NOx) – Misuse of nitrous oxide is associated with increased antisocial behaviour including littering, noise nuisance and vandalism, all of which are detrimental to residents' quality of life and feelings of</i></p>	Updates as per LGA, and response to NOx use, Spiking, changes in public since lifting of

	<p><i>safety. Use of nitrous oxide is also a health concern and has other associated harms.</i></p> <p><i>As a result, this Licensing Authority expects Licence Holders to refuse entry to any person seen use or selling NOx as a psychoactive Substance. Refusals should also be entered into Licence Holders refusals logs.</i></p> <p><i>Where its discretion is engaged this Licensing Authority impose conditions to formally require refusal of persons seen selling or using NOx as a psychoactive Substance.</i></p> <p>Drinks spiking – <i>in reference to the Local Governments Association (LGA) Guidance note on drink spiking prevention, this Licensing Authority expects licence holders and applicants to have a zero-tolerance policy towards drinks spiking. This involves as a minimum ensuring all reports of spiking are acted upon and that all incidents of alleged spiking are recorded and reported to the police. Licence holders and applicants should also be aware of the Metropolitan Police’s definition of drink spiking:</i></p> <p style="padding-left: 40px;"><i>“Spiking is where someone adds drugs or alcohol to another person’s drink without them knowing, it is illegal.”</i></p> <p><i>The LGA has set some recommendations for Licence holder, and we would expect our Licence holders to follow these where appropriate to their venues:</i></p> <p>https://www.local.gov.uk/publications/lga-guidance-note-drink-spiking-prevention#recommended-actions-for-licensed-premises-</p> <p><i>Applicants for new and variations of exiting licences as well as those submitting TENs are expected to work with the Metropolitan Police in order to consider actions needed to prevent drinks spiking in their venues/events</i></p>	<p>restrictions, and use of party boats. Gives our stance on these issues and what we expect from applicants/licensees.</p>
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Where its discretion is engaged this Licensing Authority will impose conditions on licences aimed at preventing drinks spiking, specifically any recommended by the metropolitan police.

Welfare and Vulnerability – *This Licensing Authority believes that all Licensed venues should train their staff in Welfare and Vulnerability Engagement (WAVE). As of 2023 this Licensing Authority in partnership with the Metropolitan Police and the London Borough of Hackney is delivering monthly WAVE training sessions for Licensed venues within both Tower Hamlets and Hackney. As a result, we expect that all Licensed venues who sell alcohol for consumption on their premises should train their staff in WAVE and adopt Ask for Angela or similar initiatives aimed at assisting vulnerability within alcohol licensed venues.*

Sexual Harassment in the Night Time Economy – *sadly this is still an issues for women working in and visiting licensed venues in London. As a result, this Licensing Authority encourages Licensed venues to sign up to the Mayor of London’s Women’s Night Safety Charter:*

<https://www.london.gov.uk/programmes-strategies/arts-and-culture/24-hour-london/womens-night-safety-charter>

As well as the Women’s Night Safety Charter we would encourage applicants and licence holders to discuss applications with the Council’s Violence Against Women and Girls Service, who can provide advice and training to venues on preventing misogyny within licensed premises.

Lastly, we expect Licence Holders to take a zero-tolerance approach to misogyny within their venues where this is towards customers or employees. We would expect refusal in the first instance of acts of misogyny and reporting to the metropolitan police.

	<p>Party Boats – <i>An increasing number of complaints have been received in London Boroughs that boarder the River Thames in relation to “Party Boats”, which use the River. In respect of this we would encourage applicants for Party Boats to consider adopting the conditions listed in our Model Conditions in Appendix 3, where appropriate to promote the Licensing Objective of Prevention of Crime and Disorder. Furthermore, where its discretion is engaged, this Licensing Authority may add one or more of the boat conditions from our Model Conditions.”</i></p>	
Page 14 (20 on reviewed Policy)	Para 7.12 (now 9.17) Delete “a standard”. Add and “s” to “condition” and Add “to licence where appropriate and proportionate to reduce the risk of receiving smuggled goods and encourage traceability”. Then Delete “as follows” and sub paras 1 to 5.	Move conditions to Appendix 3 – Model Conditions.
Page 15 (20 on reviewed Policy)	Para 7.13 (now 9.18) Delete “in their application form the” and Add “adding the”, then Delete “following conditions:”. Then Add “Olympic Park – Football Ground conditions in our Model Conditions in appendix 3.” Then Delete sub para 1).	Move conditions to Appendix 3 – Model Conditions.
Page 16 (20 on reviewed policy)	After para 8.6 (now 10.6) insert new para: <p><i>“<u>Martyn’s Law</u> – This will place a requirement on those responsible for certain locations/premises to consider the threat from terrorism and implement appropriate and proportionate mitigation measures, see link below. Numerous licensed premises within the borough may fall within the scope of this legislation. The law is likely to come into force in 2024/25, or sooner. Thus, Licence holders and applicants should consider the threat from terrorism and implement appropriate and proportionate mitigation measures. In particular they should consider completing Police ACT Training: https://ct.protectuk.police.uk/ https://www.protectuk.police.uk/news-views/martyns-law-what-you-need-know”</i></p>	Added after consultation with Community Safety. Encourages licence holders to consider the threat from terrorism.

Page 16 (22 on reviewed Policy)	<p>Replace para 9.2 now (11.2) with the below: <i>“Like many London boroughs, Tower Hamlets has many areas of the borough where businesses and residents are “cheek by jowl” with each other. Thus, the correct balance needs to be adopted ensuring residents are not unduly disturbed by licensed premises, whilst ensuring this does not stifle growth in the licence trade.”</i></p>	<p>Changed following consultation with Environmental Health - Noise</p>
Page 16 (22 on reviewed Policy)	<p>After para 9.2 (now 11.2) Add the below paras.</p> <p><i>“Though all licensed premises must promote the licensing objectives, and thus actively try to prevent public nuisance being caused by their licensable activities, there are some factors that this Licensing Authority would expect to applicants to consider and where appropriate address in their operating schedule. These are:</i></p> <ul style="list-style-type: none"> <i>a) Music/performances Measures to reduce impact of noise on residents</i> <i>b) Queue management Measure to prevent obstruct access to properties, pavements. Measure to reduce the impact of people noise on residents</i> <i>c) Ingress and Egress Measure to prevent people noise during ingress and egress</i> <i>d) Use of outside areas (see 11.7 below)</i> <i>e) Deliveries, particularly pick-ups by vehicles Measures to prevent noise/fumes from engines, drivers (including smoking),</i> <i>f) Bottle disposal Done at reasonable time to prevent impact on residents e.g. between 8am and 8pm</i> <i>g) Litter Measures to prevent littering around the venue from patrons</i> 	<p>Changed following consultation with Environmental Health - Noise</p>

	<p><i>The Licensing Authority appreciates that it would not be necessary or appropriate for all applications to have measures to prevent the above issues. Nevertheless, we will take a strong view on applications for licences that are in close proximity to residential premises, and whose intended use has a higher likelihood of causing public nuisance. This also includes those applications in areas covered by a Cumulative Impact Assessment (CIA). Especially where the applications falls outside the scope of any exceptions to such CIAs.”</i></p>	
Page 16 (22 on reviewed Policy)	<p>Para 9.3 (no 11.4) after the word “identified” Delete the remainder of the sentence and Replace with: <i>“listed above, or any other conditions it considered appropriate and proportionate to promote the licensing condition of prevention of public nuisance.”</i></p>	<p>Better clarity considering para changes above, changed as part of Environmental Health – Nosie response to consultation.</p>
Page 17 (23/24 on reviewed Policy)	<p>After para 9.5 (now 11.8) Add the below Paras: <i>“Beer Gardens and outside areas – since the ending of the restrictions imposed during the Coronavirus pandemic, we have seen an increase the use of outside areas. This has also been encouraged by Government under the Business and Planning Act 2020. We want to strike the right balance between allowing businesses to thrive whilst still protecting residents of the borough being unduly disturbed by the night time economy. Hence, we would encourage applicants address this concern in their operating schedule by detailing what mitigating measures they intend adopt to reduce any disturbance the use of the outside area is likely to have on neighbouring residents. Such measures could include:</i></p> <ul style="list-style-type: none"> • <i>limiting the amount of patrons permitted in the outside area, and/or,</i> 	<p>Addition of our expectation for applicants in relation to Beer Gardens and Outdoor Space, and Party Boats. This is in response to changing trends in recent years.</p>

	<ul style="list-style-type: none"> • <i>restricting the use of areas after a certain time,</i> • <i>ceasing its use after a certain time.</i> <p><i>Where disturbance of residence from outside areas is likely, and where its discretion is engaged, this Licensing Authority may add conditions limiting the numbers of person permitted to use any outside areas, and/or seek to cease the use of any outside areas after 21:00 hours.</i></p> <p>Party Boats – <i>An increasing number of complaints have been received in London Boroughs that boarder the River Thames in relation to “Party Boats”, which use the River. In respect of this we would encourage applicants for Party Boats to consider adopting the “Boat” conditions, listed in our Model Conditions in Appendix 3, where appropriate to promote the Licensing Objective of Prevention of Public Nuisance. Furthermore, where disturbance of residence from these party boats is likely, and where its discretion is engaged, this Licensing Authority may add one or more of the boat conditions from our Model Conditions.”</i></p>	<p>This has been slight amended by Environmental Health – Noise as part of the response to the consultation, this mainly relates to the bullet points, and first sentence of the Part Boats para.</p>
Page 19 (26 on reviewed Policy)	Para 10.12 (now 12.12), after the word “appropriate” Delete “covert”.	Wrong use of language. Covert suggest surveillance, which this is not.
Page 19 (26 of reviewed Policy)	After para 10.12 (now 12.12) Add new para below: <i>“Where its discretion is engaged this Licensing Authority will consider refusal/revocation in the first instance where test purchases have found venues selling age restricted products to children.”</i>	Clarification of Authority’s position in response to sales of age restricted products to children.

Page 20 (27 on reviewed Policy)	Para 10.15 (now 12.16) after the word “impose” Delete the rest of the sentence and sub paras 1) to 4). The Add: “ <i>“Challenge 25” conditions from our model conditions in appendix 3.</i> ”	Move conditions to Appendix 3 – Model Conditions.
Page 20 (27 of reviewed Policy)	After para 10.15 (now 12.17) Add below para: <i>“Where proportionate and appropriate, and its discretion is engaged, the Licensing Authority will impose the “Online Deliveries” conditions from model conditions in appendix 3 to ensure adequate age verification systems.”</i>	Response to changes in deliver of alcohol. Provides Authorities expectation on how we expect applicants to promote the Prevention of Children from Harm Objective if intending to do delivery sales of alcohol. This also covers use of online platforms.
Page 20 (27 on reviewed Policy)	Para 11.2 (now 13.2 after “recommendations of the BBFC” Add full stop and delete the rest of the para. Delete para 11.3	The policy now refers applicants to the BBFC, which provides national consistency and allows the films to be shown anywhere within the UK.

Page 25 (31 on reviewed Policy)	Delete para 15.2 (now 17.2) Replace with below para: <i>“However, where the Licensing Authority’s discretion is engaged, it may consider restricting those hours in order to promote the licensing objectives. For example, where representations provide evidence of crime and disorder or public nuisance linked to the premises.”</i>	Better clarity on the Authority’s view, i.e. stronger view on restricting hours in order to promote the licensing objectives.
Page 25 (31 on reviewed Policy)	After para 15.2 (now 17.2) Add below paras: “Psychoactive Substances, e.g. Nitrous Oxide (NOx) – Misuse of nitrous oxide is associated with increased antisocial behaviour including littering, noise nuisance and vandalism, all of which are detrimental to residents ‘quality of life and feelings of safety. Use of nitrous oxide is also a health concern and has other associated harms. <i>Where its discretion is engaged this Licensing Authority will consider refusal/revocation in the first instance where there is evidence that a shop, supermarket, or store is or has been selling Psychoactive Substances.”</i>	Provide clarity that where a review application or representation to an application is received relating to the premises has or is selling Psychoactive Substances refusal/revocation will be considered even in the first instance.
Page 28 (33 on reviewed Policy)	Para 17.5 (now 19.5) after “(00:00 to 06:00)” Add: <i>“must pay the levy”</i>	Better clarity
Page 33/34 (40 on reviewed Policy)	Para 22.4 (now 24.4) Paras 22.6 and 22.7 change the “200 persons” to “500 persons” Change Paras 22.5 to 22.8 to sub bullets i to iv.	Better clarity and update to legislation (from 200 to 500 persons)

Page 34 (41 on reviewed Policy)	<p>Para 23.1 (now 25.1) after the sentence ending “and addressed” Add: <i>“Completing of such a risk assessment should include checking previous venues where the artists / performers / promoters have performed recently to see if there have been any issues, and any social media sites to check for any potential problems such as a young audience. The risk assessment should consider the provision and numbers of SIA security, search, ejection policy and entry and egress plans. Such risk assessments should be written down, stored for a year, and made available to Responsible authorities upon request.”</i></p>	Added in response to Consultation response from Met Police.
Page 34 (41 on reviewed Policy)	<p>Delete para 23.2 to 23.4. Replace with below paras: <i>“Licence Holders should discuss their Risk assessments with Metropolitan Police at least 14 days prior to the proposed event.</i></p> <p><i>The additional event/promotion specific risk assessment is for where the venues have events/promotions with different artistes or DJs than their usual DJ/Artistes.”</i></p>	696 and 696A forms now withdrawn. Clarity on when a Risk Assessment is needed.
Page 34 (41 of reviewed Policy)	<p>Para 23.5 (no 25.4) Delete “standard conditions” and Replace with “<i>model conditions in appendix 3</i>”.</p> <p>After “as suggested in the..” Delete the rest of the sentence and Replace with “<i>applicants operating schedules, or the licensing authority is engaged, i.e., where relevant representations for any application are received.</i>”</p> <p>The Delete “by the Responsible Authorities” at the end of the para.</p>	Added in response to Consultation response from Met Police, and to refer to Model Conditions in Appendix 3.
Page 35 (41 on reviewed Policy)	Delete para 23.6 and 23.7	696 and 696A forms now withdrawn

Page 35 (41 on reviewed Policy)	Para 23.8 (now 25.5) Delete sentence below “ <i>Significant Event</i> ”	696 and 696A forms now withdrawn
Page 35 (41 on reviewed Policy)	Delete bullet number for para 23.9 and move para to sit under para 23.8	Define significant event.
Page 36 (42 on reviewed Policy)	Para 24.2(now 26.2) Delete: “(these figures are inclusive of Late TENs)” After bullet starting with “50 times” Add “(inclusive of Late TENs subject to a maximum of 10)” to the end of this bullet. After bullet starting with “5 times” Add “(inclusive of Late TENs subject to a maximum of 2)” to the end of this bullet	Correct to legislation/guidance changes
Page 36 (42 on reviewed Policy)	Para 24.2 (now 26.2), b) After the number “15” Add * After the number “21” Add ** After d) Add below para: “ <i>The Alcohol Licensing (Coronavirus) (Regulatory Easements) (Amendment) Regulations 2021 has temporarily increased the limits detailed in b) above for 2022 to 2023 (calendar year). * increased to 20 days and ** increased to 26 days.</i> ”	Correct to legislation change as to temporarily increase TEN limits to compensate for restrictions on the hospitality during the pandemic.
Page 37 (43 on reviewed Policy)	Para 24.5 (now 26.5) After the word “temporary event” Delete “, and that the event has been”. Add “. <i>We also expect that events are</i> ” After “Metropolitan Police” Add: “ <i>and Environmental Health, Noise</i> ”, Replace “before” with “ <i>prior</i> ”	Events should be discussed with both relevant persons i.e. Police and Environmental

		Health, Noise – this give this clarity.
Page 37 (43 on reviewed Policy)	Under para 24.5 (now 26.5) Add: new para 26.6 <i>“Risk Assessments: In order to assist the Metropolitan Police, we would strongly urge that Risk Assessments are either included with the TEN submission or sent to the Police via the details in Council’s Responsible Authority list on their website. Such risk assessments need to include a description of the event, any risks identified with the event such as increased possibility of intoxicated customers, underage attending the event, or perceived drug use, and any mitigating steps that have implemented to address the identified risks. Where promoted music events are taking place at the premises such a risk assessment should include checking previous venues where the artists / performers / promoters have performed recently to see if there have been any issues, and any social media sites to check for any potential problems such as a young audience. The risk assessment should also consider the provision and numbers of SIA security, search, ejection policy and entry and egress / dispersal plans.”</i>	Requested by Police Licensing and added to as in response to Consultation response from Met Police.
Page 37 (43 on reviewed Policy)	Para 24.5 (now 26.5) Change bullet “i” to para 26.7, and Delete “Organisers of outdoor events”, and Add: “TENs relating to outdoor events” Change bullet “ii” to para 26.8	Better clarity
Page 42/43 (50 of reviewed policy)	Under 27.4 (now 29.4) Add below para (29.5): <i>“The Coronavirus pandemic has demonstrated the need for good contact details, particularly digital ones with Licence Holders. Throughout the pandemic and this Licensing Authority held online meetings with licence holders and continued to keep them up to date with guidance on restrictions as they came in from Central Government. Through this we found that many of the contact details we had for our Licence holders, particularly email addresses where either incorrect or were those of the Solicitors who</i>	Improve contact details for Licence Holders

	<p><i>dealt with the original application at the time. This has also caused issue for licence holders when we notify them of their annual fee with letters sometime going to solicitors' firms rather than the licence holder.</i></p> <p><i>In light of this we expect applicants to include the correct correspondence address for the proposed licence holder in their application, and where possible include an email address for the Licence Holder. We also expect Licence holders to keep this Licensing Authority up to date should the contacts for the Licence holder either address, telephone number or email address change.</i></p> <p><i>This will ensure that if needed the Licensing Authority can contact the Licence Holder promptly, we can and will help to avoid unnecessary suspensions of licences because the reminder letter was not received by the Licence Holder."</i></p>	
Page 43 (50 of reviewed Policy)	Delete paras 28, 28.1, 28.2 and 29, 29.1 and 29.2.	No longer needed as covered in Equality Section above.
Page 47 (54 on reviewed Policy) - Appendix 1	<p>Delete the sentence in brackets after "Appendix 1"</p> <p>After the first para Delete list of Responsible Authorities and Add: <i>"For a full list of Responsible Authorities please see the link below, which is updated regularly:</i></p> <p>https://www.towerhamlets.gov.uk/lgnl/business/licences/beer_and_entertainment/Responsible-Authorities.aspx</p>	Ensures applicants etc. view an up to date list of responsible authorities.

<p>Page 55 (60 on reviewed Policy)</p>	<p>Add new Appendix 3 as below:</p> <p><u>Appendix 3</u></p> <p>Model Conditions</p> <p><i>The below are a list of model conditions, which are intended to be used by Applicants, Responsible Authorities, or Other Persons making a representation. Where necessary these conditions should be modified in order to be appropriate, proportionate, and enforceable in respect to the type of application.</i></p> <p><i>This appendix does not form part of the Statement of Licensing Policy to allow for it to be modified where appropriate to ensure conditions contain fit any new or emerging trends.</i></p> <p><i>This basket of model conditions is not an exclusive or exhaustive list of conditions which may be included on a premises licence. It does not restrict any applicant, responsible authority, or interested party from proposing any alternative conditions, nor would it restrict a licensing sub-committee from imposing any reasonable condition on a licence it considers necessary for the promotion of the licensing objectives.</i></p> <p><i>Conditions are listed under the Licensing Objective that they most appropriately promote.</i></p> <p>Key: <i>The second column in the table that follows indicates the types of premises to which the condition in the third column might be of most relevance.</i></p> <p>A Restaurants B Public houses, wine bars or other drinking establishments C Café-bars D Hotel bars</p>	<p>New Model Conditions, which can be kept under review to ensure accurate and proportionate model conditions.</p>
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- E** Night-clubs
- F** Off-licences (including convenience stores)
- G** Pavement licences
- H** Qualifying clubs
- I** Take-aways
- J** Boats
- H** Other entertainment venues

Number	Suggested Applicable Premises	Condition
Prevention of crime and disorder		
1	A, B	<p><i>Touting:</i></p> <ol style="list-style-type: none"> 1. <i>No person shall be employed to solicit for custom or be permitted to solicit for custom for business for the premises in any public place within a 500 meters radius of the premises as shown edged red on the attached plan. (marked as Appendix -)</i> 2. <i>Clear Signage to be placed in the restaurant windows stating that the premises supports the Council's 'No Touting' policy.</i>
2.	J	<p><i>Boats:</i></p> <ol style="list-style-type: none"> 1. <i>For all externally promoted events including DJs, birthday bookings (where the person whose birthday it is aged 25 or under), all football related bookings and for publicly ticketed events, all drinking vessels used in</i>

			<p><i>the venue shall be polycarbonate. All drinks in glass bottles are to be decanted into polycarbonate containers or polycarbonate carafes prior to being served, with the exception of champagne or bottles of spirits with a minimum size of 70cl supplied by waiter/waitress service to tables. Staff shall clear all empty champagne and spirit bottles promptly from the tables. Customers shall not be permitted to leave their table carrying any such glass bottles or drink directly from the bottle.</i></p> <ol style="list-style-type: none"> <i>2. The bar shall close 15 minutes prior to disembarkation, after this no alcohol shall be sold. This is to be announced on the public address system.</i> <i>3. Passengers shall not be allowed to bring alcohol on board the vessel.</i> <i>4. The crew shall make a comprehensive safety announcement over the PA system before every departure. This is to include a segment on drink aware and the ejection policy.</i> <i>5. Any passenger that becomes abusive/aggressive to the crew or other passengers shall be asked to leave the vessel. Such persons will be ejected at the nearest available pier. A duty of care shall be provided for the ejected persons and to consider calling the emergency services.</i> 		
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	3.	A-H	<p><i>Smuggled Goods:</i></p> <p>1. <i>The premises licence holder and any other persons responsible for the purchase of stock shall not purchase any goods from door-to-door sellers other than from established traders who provide full receipts at the time of delivery to provide traceability.</i></p> <p>2. <i>The premises licence holder shall ensure that all receipts for goods bought include the following details:</i></p> <ul style="list-style-type: none"> <i>i. Seller's name and address</i> <i>ii. Seller's company details, if applicable</i> 	

			<p>iii. Seller's VAT details, if applicable</p> <p>iv. Vehicle registration detail, if applicable</p> <p>3. Legible copies of the documents referred to in 2) shall be retained on the premises and made available to officers on request.</p> <p>4. The trader shall obtain and use a UV detection device to verify that duty stamps are valid.</p> <p>5. Where the trader becomes aware that any alcohol may be not duty paid they shall inform the Police of this immediately.</p>	
	4.	A, B, C, D, G	<p><u>Olympic Park – Football Ground/Special Events:</u></p> <p>1. On Match Days for premises licensed for the supply of alcohol for consumption on the premises:</p> <p>1) Drinks shall only be supplied in polypropylene or similar plastic and all bottled drinks shall be poured into such drinking vessels before being handed to the customer. These should be made of recyclable materials.</p> <p>2) Registered door staff shall be employed to control the entry and exits to the premises and to manage any licensed outside area(s).</p>	

			<p>2. <i>No drinks shall be served in glass containers at any time during/whilst* [insert special event] *delete as appropriate</i></p>	
	5.	A-H	<p><i>CCTV/Incident Recording/Reporting</i></p> <p>1. <i>The premises shall install and maintain a comprehensive CCTV system as per the minimum requirements of the Tower Hamlets Police Licensing Team. All entry and exit points will be covered enabling frontal identification of every person entering in any light condition. The CCTV system shall continually record whilst the premises is open for licensable activities and during all times when customers remain on the premises. All recordings shall be stored for a minimum period of 31 days with date and time stamping. Viewing of recordings shall be made available immediately upon the request of Police or authorised officer throughout the entire 31-day period.</i></p> <p>2. <i>The CCTV system serving the premises shall:</i></p> <ul style="list-style-type: none"> <i>a) be maintained fully operational and in good working order at all times;</i> <i>b) make and retain clear images that include the points of sale of alcohol and facial images of the purchasers of the alcohol; and</i> <i>c) show an accurate date and time that the images were made.</i> 	

			<p>3. <i>A staff member from the premises who is conversant with the operation of the CCTV system shall be on the premises at all times when the premises are open. This staff member must be able to provide a Police or authorised council officer copies of recent CCTV images or data with the absolute minimum of delay when requested.</i></p> <p>4. <i>No alcohol shall be sold if the CCTV equipment is inoperative for any reason.</i></p> <p>5. <i>An incident log shall be kept at the premises and be available on request to the Police or an authorised officer. It must be completed within 24 hours of any incident and will record the following:</i></p> <ul style="list-style-type: none"> <i>a) all crimes reported to the venue;</i> <i>b) all ejections of patrons;</i> <i>c) any complaints received concerning crime and disorder</i> <i>d) any incidents of disorder;</i> <i>e) all seizures of drugs or offensive weapons;</i> <i>f) any faults in the CCTV system, searching equipment or scanning equipment;</i> <i>g) any refusal of the sale of alcohol;</i> <i>h) any visit by a relevant authority or emergency service.</i> 		
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		<p>6. <i>In the event that a serious assault is committed on the premises (or appears to have been committed) the management will immediately ensure that:</i></p> <ul style="list-style-type: none"> <i>a) the police (and, where appropriate, the London Ambulance Service) are called without delay;</i> <i>b) all measures that are reasonably practicable are taken to apprehend any suspects pending the arrival of the police;</i> <i>c) the crime scene is preserved so as to enable a full forensic investigation to be carried out by the police; and</i> <i>d) such other measures are taken (as appropriate) to fully protect the safety of all persons present on the premises.</i> 	
6.	A-H	<p><u>Personal Licence Holder/DPS</u></p> <ul style="list-style-type: none"> 1. <i>There shall be a personal licence holder on duty on the premises at all times when the premises are authorised to sell alcohol.</i> 2. <i>When the designated premise supervisor is not on the premises any or all persons authorised to sell alcohol will be authorised by the designated premises supervisor in writing. This shall be available on request by the Police or any authorised officer.</i> 	
7.	B, C, H, E, H	<u>Security/Searching</u>	

			<ol style="list-style-type: none"> 1. A minimum of [insert appropriate number] SIA licensed door supervisors shall be on duty at the premises at all times whilst it is open for business 2. On any occasion that regulated entertainment is provided, not less than [insert appropriate number] SIA registered door supervisors will be engaged to control entry 3. At least [insert appropriate number] SIA licensed door supervisors shall be on duty at the entrance of the premises at all times whilst it is open for business. 4. At least [insert appropriate number] female door supervisor(s) shall be engaged at the premises at such times as door supervisors are required to be provided. 5. Where SIA registered door supervisors are used at the premises, a record must be kept of their SIA registration number and the dates and times they are on duty. 6. When the premises is carrying on licensable activities after [insert appropriate time (24HR format)] hours, at least [insert appropriate number] door supervisor(s) will to be on duty at each door used for entry or exit. 		
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		<p>7. No patrons shall be admitted or re-admitted to the premises after [insert appropriate time (24HR format)] unless they have passed through a metal detecting search arch and, if the search arch is activated or at the discretion of staff, then physically searched, which will include a 'pat down search' and a full bag search.</p> <p>8. All persons entering or re-entering the premises shall be searched by a SIA licensed member of staff and monitored by the premises CCTV system.</p> <p>9. A written search policy that aims to prevent customers or staff bringing illegal drugs, weapon or other illegal items onto the premises at any time shall be in place and operate at the premises.</p> <p>10. A clearly visible notice shall be placed at each entrance to the Premises advising those attending that it is a condition of entry that customers agree to being searched and that the police will be informed if anyone is found in possession of controlled substances or weapons. (E)</p> <p>11. All staff engaged outside the entrance to the premises, or supervising or controlling queues, shall wear high visibility jackets or vests. (B, E, J)</p> <p>12. There must be at the premises a lockable drugs box to which no member of staff, save the DPS and /or</p>	
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			<p><i>[insert other responsible person, e.g. Premises Licence Holder, Manager, etc., as appropriate], shall have access. All controlled drugs (or items suspected to be controlled drugs or contain controlled drugs) found at the premises must be placed in this box as soon as practicable. Whenever this box is emptied, all of its contents must be given to the Police for appropriate disposal.</i></p>		
8.	E, H	<p><u>External Promoters:</u></p> <p>13. <i>The premises licence holder must submit to the relevant police officer on request a completed risk assessment form as prescribed at least 14 days before any event that is promoted/advertised to the public at any time before the event and features DJ's, MC's or equivalent performing to recorded music.</i></p>			
9.	F	<p><u>Alcohol limits:</u></p> <p>14. <i>No super-strength beer, lagers, ciders or spirit mixtures of 5.5% ABV (alcohol by volume) or above shall be sold at the premises, except for premium beers and ciders supplied in glass bottles.</i></p> <p>15. <i>No single cans or bottles of beer or cider or spirit mixtures shall be sold at the premises.</i></p>			

		16. <i>All sales of alcohol for consumption off the premises shall be in sealed containers only and shall not be consumed on the premises.</i>	
Public Safety			
10.	A, B, C, D, E, G, J, H	<u>Restrictions on use of glass container:</u> 1. <i>No drinks shall be served in glass containers at any time.</i> 2. <i>All drinking vessels used in the venue shall be polycarbonate. All drinks in glass bottles are to be decanted into polycarbonate containers or polycarbonate carafes prior to being served, with the exception of champagne or bottles of spirits with a minimum size of 70cl supplied by waiter/waitress service to tables. Staff shall clear all empty champagne and spirit bottles promptly from the tables. Customers shall not be permitted to leave their table carrying any such glass bottles or drink directly from the bottle.</i> 3. <i>Notwithstanding 2 above, with the written agreement of the Tower Hamlets Licensing Police, a copy of which will be held at the premises reception, glass drinking vessels may be used for private or pre-booked events within the (specified area).</i> 4. <i>Patrons permitted to temporarily leave and then re-enter the premises,</i>	

			<i>e.g., to smoke, shall not be permitted to take drinks or glass containers with them.</i>
11.	<i>B, E, I & J</i>	<u>Capacity</u>	1. <i>The number of persons permitted in the premises at any one time (including staff) shall not exceed [insert appropriate number] persons[, and such number shall be prominently displayed by each entrance to the premises]*delete as appropriate. [The premises licence holder shall ensure a suitable method of calculating the number of people present during licensable activities is in place] *delete as appropriate.</i>
12.	<i>Unique to Beauty Premises</i>	<u>Hairdresser/Barber/Salons:</u>	1. <i>The sale of alcohol shall only be for consumption by customers, their bona fide guests. For the avoidance of doubt there shall be no sales of alcohol to staff for consumption on the premises.</i>
Prevention of public nuisance			
13.	<i>A, B, C, D, E, J, H</i>	<u>Noise prevention</u>	1. <i>A noise limiter must be fitted to the musical amplification system set at a level determined by and to the satisfaction of an authorised officer of the Environmental Health Service, so as to ensure that</i>

			<p><i>no noise nuisance is caused to local residents or businesses. The operational panel of the noise limiter shall then be secured by key or password to the satisfaction of officers from the Environmental Health Service and access shall only be by persons authorised by the Premises Licence holder. The limiter shall not be altered without prior agreement with the Environmental Health Service. No alteration or modification to any existing sound system(s) should be effected without prior knowledge of an authorised Officer of the Environmental Health Service. No additional sound generating equipment shall be used on the premises without being routed through the sound limiter device.</i></p> <p>2. <i>Loudspeakers shall not be located in the entrance lobby or outside the premises building.</i></p> <p>3. <i>All windows and external doors shall be kept closed after [insert appropriate time (24HR format)] hours, or at any time when regulated entertainment takes place, except for the immediate access and egress of persons.</i></p> <p>4. <i>There shall be no admittance or re-admittance to the premises after [insert appropriate time (24HR format)] except for patrons permitted to temporarily leave the premises to smoke.</i></p>		
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			<ol style="list-style-type: none"> 5. <i>There shall be no sales of alcohol for consumption off the premises after [insert appropriate time (24HR format)].</i> 6. <i>The licence holder shall enter into an agreement with a hackney carriage and/or private carriage firm to provide transport for customers, with contact numbers made readily available to customers who will be encouraged to use such services.</i> 7. <i>Notices shall be prominently displayed at all exits requesting patrons to respect the needs of local residents and businesses and leave the area quietly.</i> 8. <i>Notices shall be prominently displayed at any area used for smoking requesting patrons to respect the needs of local residents and use the area quietly.</i> 9. <i>A direct telephone number for the manager at the premises shall be publicly available at all times the premises is open. This telephone number is to be made available to residents and businesses in the vicinity.</i> 10. <i>The licence holder shall ensure that any queue to enter the premises which forms outside the premises is orderly and supervised by door staff so as to ensure that there is no public nuisance or obstruction to the public highway.</i> 		
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			<p>11. Patrons permitted to temporarily leave and then re-enter the premises to smoke shall be restricted to a designated smoking area defined as [insert specific location].</p> <p>12. The sale and supply of alcohol for consumption off the premises shall be restricted to alcohol consumed at the outside tables and chairs shown on the licence plan, shall be by waiter or waitress service, served only to a person seated taking a table meal there and for consumption by such a person as ancillary to their meal.</p> <p>13. The sale and supply of alcohol for consumption off the premises shall be restricted to alcohol consumed by persons who are seated in an area appropriately authorised for the use of tables and chairs on the highway and bona fide taking a table meal there, and where the consumption of alcohol by such persons is ancillary to taking such a meal, and where the supply of alcohol is by waiter or waitress service only.</p> <p>14. A written dispersal policy shall be in place and implemented at the premises to move customers from the premises and the immediate vicinity in such a way as to cause minimum disturbance or nuisance to neighbours.</p>		
	14.	A, B, C, D, E, G, J, H	<u>Outdoor areas</u>		

			<ol style="list-style-type: none"> 1. <i>The premises licence holder shall ensure that any patrons drinking and/or smoking outside the premises do so in an orderly manner and are supervised by staff so as to ensure that there is no public nuisance or obstruction of the public highway.</i> 2. <i>No more than [insert appropriate number] customers will be permitted to enter or remain in [insert specific location] the outdoor areas of the premises at any one time after the hours of [insert appropriate time (24HR format)].</i> 3. <i>The outdoor area shall not be used by patrons after [insert appropriate time (24HR format)].</i> 4. <i>All outside tables and chairs shall be rendered unusable by [insert appropriate time (24HR format)] each day.</i> 5. <i>All tables and chairs shall be removed from the outside area by [insert appropriate time (24HR format)] each day.</i> 6. <i>Alcohol consumed outside the premises building shall only be consumed by patrons seated at tables.</i> 7. <i>Patrons permitted to temporarily leave and then re-enter the premises, e.g., to smoke, shall be limited to [insert appropriate number] persons at any one time.</i> 	
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15.	A, B, C, D, E, G, I, J, H	<p><u>Waste disposal/collections</u></p> <p>8. No waste or recyclable materials, including bottles, shall be moved, removed from or placed in outside areas between [insert appropriate time (24HR format)] hours and [insert appropriate time (24HR format)] hours on the following day.</p> <p>9. No collections of waste or recycling materials (including bottles) from the premises shall take place between [insert appropriate time (24HR format)] and [insert appropriate time (24HR format)] on the following day.</p>	
17.	A-H	<p><u>Litter prevention</u></p> <p>1. All sealed containers of alcoholic drinks offered for sale for consumption off the premises must be clearly labelled or marked with the name and postcode of the premises.</p> <p>2. No advertisements of any kind (including placard, poster, sticker, flyer, picture, letter, sign or other mark) that advertises or promotes the establishment, its premises, or any of its events, facilities, goods or services shall be inscribed or affixed upon the surface of the highway, or upon any building, structure, works, street furniture, tree, or any other property, or be distributed to the public.</p>	

			<p>3. <i>During the hours of operation of the premises, the licence holder shall ensure sufficient measures are in place to remove and prevent litter or waste arising or accumulating from customers in the area immediately outside the premises, and that this area shall be swept and or washed, and litter and sweepings collected and stored in accordance with the approved refuse storage arrangements by close of business.</i></p> <p>4. <i>Where the premises provide late night refreshment for consumption off the premises sufficient waste bins must be provided at or near the exits.</i></p>		
	18.	J	<p><u>Boats:</u></p> <p>1. <i>Amplified music or regulated entertainment shall not take place whilst the vessel is moored at its [insert address] moorings.</i></p> <p>2. <i>No noise shall emanate from the vessel which gives rise to a nuisance.</i></p> <p>3. <i>Alcohol shall not be taken or consumed off the vessel at any time.</i></p> <p>4. <i>The bar shall close 15 minutes prior to disembarkation, after this no alcohol shall be sold. This is to be announced on the public address system.</i></p>		

			<p>5. <i>Passengers shall be advised by the crew to leave the vessel in a quiet and orderly fashion and not to do anything which is liable to disturb nearby residents. Prominent notices shall be displayed at the entrance and exit points.</i></p> <p>6. <i>All SIA approved staff engaged in supervising or controlling queues as well as engaged in duties on board the vessel shall wear high visibility yellow jackets or vests.</i></p> <p>7. <i>Crew members shall be positioned by the door to help guests disembark and ensure that overcrowding does not become a problem</i></p> <p>8. <i>While the vessel is at the pier music levels will be controlled to ensure no noise shall emanate nor vibration transmitted which gives rise to a Public Nuisance.</i></p> <p>9. <i>Flashing or particularly bright lights on or outside the premises shall not cause a nuisance to nearby properties (save insofar as they are necessary for the safety of the crew and customers, and for the prevention of crime).</i></p> <p>10. <i>Live or recorded music will not be allowed to commence until the vessel has left any embarkation pier and will cease before the vessel arrives at any disembarkation pier.</i></p>		
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Protection of Children from harm		
19.	A-H	<p><u>Challenge 25:</u></p> <ol style="list-style-type: none"> 1. All tills shall automatically prompt staff to ask for age verification identification when presented with an alcohol sale. 2. A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram. 3. A record shall be kept detailing all refused sales of alcohol. The record should include the date and time of the refused sale and the name of the member of staff who refused the sale. The record shall be available for inspection at the premises by the police or an authorised officer at all times whilst the premises is open. 4. All staff whose duties include the serving of alcohol must be trained in the requirements of this scheme including the importance of recording any refusals. 5. Entry by children under the age of 18 to [the premises] [a specified part of the premises] is prohibited between [insert appropriate hours].

			6. <i>Entry by children under the age of [insert appropriate age] to [the premises] [a specified part of the premises] is prohibited unless accompanied by an adult over the age of 18</i>
20.	A-H	<u>Staff Training</u>	<p>1. <i>All staff whose responsibilities include the retail sale of alcohol shall receive training about the prevention of underage sales on induction and then every [insert appropriate number] months thereafter/[insert appropriate number] times a year. This training shall be recorded and the records to be available on request to the Police or any authorised officer. The training to include:</i></p> <ul style="list-style-type: none"> <i>a) the operation of the challenge XX scheme;</i> <i>b) types of acceptable ID;</i> <i>c) the method of recording challenges;</i> <i>d) the likely consequences of making an underage sale;</i> <i>e) refusing sales to persons who appear to be drunk;</i> <i>f) proxy sales.</i>
21.	A, B, C, D, F, I	<u>Online Deliveries:</u>	<p>1. <i>Every third-party courier delivery box shall be labelled with the words "Age Restricted Product".</i></p>

			<ol style="list-style-type: none"> 2. <i>There shall be mechanism either by an App or on the delivery package to show the delivery rider is aware it is an age restricted product to ensure ID checks are made upon delivery of alcohol.</i> 3. <i>The premises licence holder will ensure that an age verification policy will apply whereby all delivery drivers/riders will be trained to ask any customer to whom alcohol is delivered, who appears to be under the age of 25 years to produce, before being sold alcohol, identification being a passport or photocard driving licence bearing a holographic mark or other form of identification that complies with any mandatory condition that may apply to this licence.</i> 4. <i>Alcohol shall only be delivered to a residential or business address and not to a public place or vehicle.</i> 5. <i>All off sales deliveries to be in sealed containers.</i> 6. <i>A warning shall be displayed on the digital platform on which an order is placed informing customers that they must be aged 18 or over to make a purchase of alcohol and notifying customers that the rider will carry out age verification on delivery. The customer will be required to declare that he or she aged 18 or over. If the rider is not satisfied that the customer is aged 18 or over any alcohol in the order will be withheld</i> 		
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			7. <i>The Licence holder shall notify the Licensing Authority of the digital platform(s) used for the sales of alcohol and any changes to those platforms.</i>	
		Miscellaneous (promotes more than one objective)		
	22.	A, C, D	<p>1. <i>The premises shall only operate as a restaurant:</i></p> <ul style="list-style-type: none"> a) <i>in which customers are shown to their table;</i> b) <i>where the supply of alcohol is by waiter or waitress service only;</i> c) <i>which provide food in the form of substantial table meals that are prepared on the premises and are served and consumed at the table;</i> d) <i>which do not provide any take away service of food or drink for immediate consumption;</i> e) <i>which do not provide any take away service of food or drink after 23.00, and</i> f) <i>where alcohol shall not be sold or supplied, otherwise than for consumption by persons who are seated in the premises and bona fide taking substantial table meals there, and provided always that the consumption of alcohol by such persons is ancillary to taking such meals.</i> <p>2. <i>The sale of alcohol for consumption on the premises shall only be to a person seated taking a table meal there, and for consumption by such a person as ancillary to their meal.</i></p>	

			<p>3. <i>The sale of alcohol shall be to persons seated at the premises, i.e. table service only.</i></p> <p>4. <i>Sales of alcohol for consumption off the premises shall only be supplied with, and ancillary to a take-away meal.</i></p> <p>5. <i>No more than [insert appropriate figure]% of the sales area shall be used at any one time for the sale, exposure for sale, or display of alcohol.</i></p> <p>6. <i>No vertical drinking.</i></p>		
Page 55 (79 on reviewed Policy)	Appendix 3 (now 4)		Delete John Onslow Address and add new town hall address.		Update.

The London Borough of Tower Hamlets
**STATEMENT OF
LICENSING POLICY**
2023 – 2028

Effective 1st November 2023

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Background and Context

This Policy should be read in conjunction with:

The Licensing Act 2003 available from <http://www.legislation.gov.uk/ukpga/2003/17/contents> or by telephoning +44 (0)333 202 507.

Government Guidance under Section 182 of the Licensing Act 2003: available on the website www.gov.uk or by telephoning 020 7035 4848.

Tower Hamlets guidance documents on making applications under the Licensing Act 2003 available from <http://www.towerhamlets.gov.uk/licensing> or available from the Licensing Service on 020 7364 5008.

Tower Hamlets is a Borough that is diverse, improves choice and provides enjoyment for residents and visitors to the Borough of all ages. We want to provide an environment that is safe and welcoming for all to enjoy. While at the same time we also want to ensure that we protect the quality of life for our residents by ensuring that we have sensible controls that keep anti-social behaviour, and undesirable developments selling hot food and drink between 23:00 and 05:00 to a minimum.

However, the policy only applies where the discretion of the licensing authority is engaged. That is, all applications which are unopposed must be granted as applied for. The only conditions that can be applied must relate to statements made in the application itself.

The Licensing Policy objectives and associated benefits have clear links with the Council's Strategic Plan to improve the quality of life for everyone living and working in the Borough.

The Plan has 8 priorities and is the council's main plan, which details the most important priorities for the council between 2022 and 2026. These priorities are translated from the Mayor's vision into the strategic Plan.

You will find there is more detailed information about the eight priorities: https://www.towerhamlets.gov.uk/ignl/community_and_living/community_plan/strategic_plan.aspx

1 Introduction

- 1.1 The London Borough of Tower Hamlets is the Licensing Authority under the Licensing Act 2003 (the Act). It is responsible for granting premises licences; club premises certificates; temporary events notices, in respect of the provision of licensable activities; and personal licences in the Borough.

The term 'Licensing Authority' will be used in all future references to 'the London Borough of Tower Hamlets' in this Statement of Licensing Policy.

All references to the Secretary of State's Guidance relate the statutory guidance published by the Home Office under section 182 of the Act in December 2022. A copy of this version is available at www.gov.uk.

- 1.2 This policy is intended to provide clarity to applicants, 'other persons' and 'responsible authorities' on how this Licensing Authority will determine applications for the following licensable activities:
- Retail sale of alcohol
 - Supply of alcohol to club members
 - Provision of regulated entertainment (as defined in Schedule 1 of the Act)
 - Supply of hot food and / or drink between 23:00 and 05:00 hours

2 The Policy

- 2.1 This 'Statement of Licensing Policy' was prepared in accordance with the provisions of the Act and having had regard to the Secretary of State's Guidance issued under Section 182 of the Act.
- 2.2 The 2003 Act requires that the Licensing Authority, after consultation, adopts and publishes a "Statement of Licensing Policy" that sets out the policies the Licensing Authority will apply to promote the licensing objectives when making decisions on applications made under the Act. It is a requirement that this Policy is reviewed at least every five years. The Licensing Authority will apply the standards and policies set out in this Statement unless good reason exists not to do so. Each application will nonetheless be considered individually on its merits and both applicants and those making relevant representations will be treated fairly and objectively.

3 Consultation

- 3.1 Before publishing this revised Policy Statement, the Licensing Authority has consulted those parties specified in Section 5(3) of the Licensing Act 2003, which are:
- the Chief Officer of Police,
 - the London Fire Brigade,
 - Director of Public Health within Tower Hamlets
 - representatives of holders of existing Premises Licences, Personal Licences and Club Premises Certificates in the Borough
 - such other persons considered to be representatives of business and residents in the area.

The Licensing Authority has given due regard to the responses from this consultation process when completing the final version of this Policy Statement.

- 3.2 The Licensing Authority will ensure that its consultation is broadly based, available on the internet, and the responsible authorities as well as wide range of community, public, welfare and religious organisations, and other key stakeholders are consulted.
- 3.3 The Licensing Authority will give due weight to the views of all the persons / bodies consulted before the Policy Statement is agreed and implemented.
- 3.4 The Licensing Authority undertakes to involve the Tower Hamlets Community Safety Partnership (or equivalent organisation) in policy development and review.
- 3.5 All major reviews will be broadly based, as well as complying with statutory requirements.

4 Equality and Inclusion in Licensed Venues

- 4.1 As per Tower Hamlets Equality Policy, we want Tower Hamlets to be a place where people have equal access to opportunities and where inequality is actively tackled. Tower Hamlets Equality Policy recognises that this can only be done by working with our partners to advance equality, promote good community relations and tackle discrimination. The Council believes that diversity of our community is one of our greatest strengths and assets. We value the strength that comes with difference and the positive contribution that diversity brings to our community. This includes achieving equality and inclusion in all that we do, to improve the quality of life and opportunities for all people who live, work, and visit the borough. The Equality Policy seeks to embed equality throughout the council's plans, services, and activities to ensure it is a key driver for everything we do. As a Licensing Authority we want to do all that we can do to ensure our borough is open and accessible to all.

4.2 It is unlawful for any venue to discriminate against anyone based on race, sex, sexual orientation, age, or any of the protected characteristics under the Equality Act 2010. In our view equality and inclusion extends beyond this definition within the 2010 Act. Any type of discrimination be it intentional or subconscious is inherently damaging for the individual, our wider community, and our economy. Moreover, it actively harms the interests of licensed premises and the licensed industry.

4.3 Tower Hamlets is a diverse and culturally rich borough. It is a microcosm of London and has the fastest population growth in the country because we are a very special place and people want to live and work here. We have always been a gateway for people of all backgrounds to come and better themselves. As part of London's east end, we are enriched by the significant contributions made by a diversity of communities and migrant groups and boast a proud history of collective action against racism and bigotry. Altab Ali Park is an iconic area in the borough that speaks to the richness of this history. Yet, it is only one of the many Parks that has historical importance within the borough, many of which are often used to host small community events to large music festivals. We want to celebrate and build on this, which means we need to hold ourselves, as well as the venues and businesses we licence to account to ensure that together we continue to promote and offer equal opportunities and inclusive experiences for everyone.

4.4 Duties as a License Holder to Equality

Applicants and licensees must make themselves familiar with the law and their responsibilities set out within the Equality Act 2010 and relevant guidance for businesses, which can be found on the Equality & Human Rights Commission website. The 2010 Act makes discrimination against any person (including employees and customers) unlawful. The 2010 Act defines the relevant protected characteristics as age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. Any activity in breach of the 2010 Act may be considered an offence and will lead to enforcement by the Equality and Human Rights Commission.

As part of Tower Hamlets No Place for Hate (NPFH) Campaign we would encourage all licence holders and new applicants to sign our Organisational pledge against hate. Organisations who sign this pledge are published on the website. This helps promote equality within our borough.

https://www.towerhamlets.gov.uk/lgnl/community_and_living/community_safety_crime_preve/hate_crime/organisational_pledge.aspx

4.5 Public Sector Equality Duty

The Council must have regard to its public sector equality duty under the 2010 Act.

In summary a Public Authority must, in the exercise of its functions, have due regard to the need to:

- eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under this Act.
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

4.6 Expectation on Licence holders and applicants to equality and inclusivity

There is no one size fits all approach to making a venue inclusive, and each operator will need to make an assessment of its own practices and policies. However, the following are common and best practice examples that could be adopted:

- Inclusive and transparent policies (for example, admittance policies may clearly stipulate adherence to a dress code and refusal if there are concerns about a customer; however, they must not prevent admittance based on any of the protected characteristics).
- Robust complaints procedures that make it easy for customers who feel they have been discriminated against to raise their concerns and understand how this will be investigated or managed.
- Accessible venue layouts that make venues welcoming.
- Comprehensive training on equality and inclusion for all staff, which is regularly refreshed.

4.7 Using the Licensing Process to promote equality and inclusivity

This Authority will use the Licensing Process to ensure both Operators and the Council are compliant in carrying out their legal obligations. This includes:

- Determining licensing applications and reviews.
- Making representations as a responsible authority.
- Applying for reviews in appropriate circumstances.
- Defending appeal decisions

In essence this means that the Council through this licensing process will identify applicants that do not provide sufficient information on how they are promoting equality and inclusivity and could make a representation to require that the applicant address the issue or explain to members of the Licensing Sub-Committee why they have not done so.

4.8 Tower Hamlets Commitment to Equality and Inclusivity

Over the duration of this Statement of Licensing Policy Tower Hamlets as a Licensing Authority will:

- Ensure that any strategy or policy affecting the licensed industry is always underpinned by the promotion of equality and inclusivity.
- Provide where possible advice and support to Licence Holders and Applicants on promoting equality and inclusivity by signposting them to internal and external bodies that can provide expert guidance.

5 Main Principles of the Licensing Policy

5.1 The Act requires that the Licensing Authority carries out its various licensing functions so as to promote the following four licensing objectives:-

5.2 *The prevention of crime and disorder*

Consideration, among other things, a prescribed capacity; door supervisors; an appropriate ratio of tables and chairs to customers; and a requirement that security staff holding the appropriate SIA licence or exemption are present to control entry for the purpose of compliance with the capacity limit and to deny entry to individuals who appear drunk or disorderly or both.

5.3 *Public safety*

Consideration of requiring specific types of training for a DPS or security staff, including awareness of first aid or initiatives to protect women and vulnerable customers; provision and storage of CCTV footage; and ensuring safe departure of those using the premises.

5.4 *The prevention of public nuisance*

Consideration of the prevention of irresponsible promotions, methods of preventing and managing noise and light pollution, and ways of managing litter.

5.5 *The protection of children from harm*

Consideration of age verification schemes, test purchasing policies, and restrictions on the hours when children may be present.

- 5.6 All of the Policy and its implementation must be consistent with those four objectives.
- 5.7 Nothing in the Licensing Policy will undermine the rights of any person to apply under the Act for a variety of permissions and have the application considered on its individual merits and / or override the right of any person to make representations on any application or seek a review of a licence or certificate where they are permitted to do so under the Act.
- 5.8 Licensing is about regulating licensable activities of licensed premises, by qualifying clubs and at temporary events within the terms of the Act. The conditions attached to licences and / or Temporary Event Notifications will be focused on matters that are within the control of individual licensees.
- 5.9 In relation to all applications where the Licensing Authority's discretion is engaged it will consider the direct impact of the activities taking place at the licensed premises on members of the public living, working or engaged in normal activity in the area concerned relating to the four Licensing Objectives.
- 5.10 The Police Reform and Social Responsibility Act introduced the provision for the licensing authority to make representations. The Licensing Authority will not make representations that should be made by another responsible authority. The Licensing Authority may wish to make representations on its own account when they could include bringing together a number of minor unconnected complaints that in themselves do not require another responsible authority to make a representation, but when taken together may constitute a public nuisance, represent breaches of licence conditions only observed by licensing officers or which undermines the licensing objectives.
- 5.11 If representations are made by a "responsible authority" or other persons the application will be determined by the Licensing Sub-Committee. In making decisions on licence applications, the Licensing Sub-Committee will have regard to the Act and relevant Regulations, the Secretary of State's Guidance, and this Statement of Licensing Policy. Where this occurs the Licensing Authority's discretion is engaged and it may insert conditions such as ones detailed further on in this policy.
- 5.12 Where no representations are made the application will be granted subject only to the mandatory conditions and conditions that are consistent with the applicant's operating schedule.

- 5.13 This Licensing Authority will ensure that any conditions added to a licence/authorisation are enforceable and proportionate and are consistent with the general principles for licence conditions detailed the Secretary of State's Guidance. We encourage applicants' responsible authorities and other persons to have regard to this Guidance when considering additional conditions. We also encourage the use of words such as "must", "shall" and "will" when deciding the wording of any condition.
- 5.14 Licensing laws are not the primary method of for general control of nuisance and anti-social behaviour by individuals once they are away from any licensed premises, thus being beyond the direct control of the Licensee/Certificate holder or holder of any other such authorisation (e.g. Temporary Event Notice). However, it is a key aspect of control and licensing laws will always be part of an overall approach to the management of the evening and night time economy.
- 5.15 In this respect, the Licensing Authority recognises that, apart from the licensing function, (and issues around cumulative effect) there are a number of other mechanisms available for addressing issues of unruly behaviour that can occur away from licensed premises, including (the list is not exhaustive):
- planning controls
 - ongoing measures to create a safe and clean environment in these areas in partnership with local businesses, transport operators and other Council Departments
 - designation of parts of the Borough as places where alcohol may not be consumed publicly
 - regularly liaison with Borough Police on law enforcement issues regarding disorder and anti-social behaviour, including the issue of fixed penalty notices, prosecution of those selling alcohol to people who are drunk, confiscation of alcohol from adults and children in designated areas and instantly closing down licensed premises or temporary events on the grounds of disorder, or likelihood of disorder or excessive noise from the premises
 - the power of the police, other responsible authority or a local resident or business to seek a review of the licence or certificate

- 5.16 Given the restrictions placed upon the licensed trade during the pandemic we recognise the importance and positive benefits that the licensed trade brings to the Borough. This includes not just social benefits for customers, but jobs and associated regeneration, as well as the benefits to the arts in respect to music, dance and other entertainment, all of which celebrates the rich mixture of cultural diversity and creativity that exists within Tower Hamlets.
- 5.17 Applicants for authorisations/permissions (e.g. premises licence etc.) under the Licensing Act 2003 must carry out the required statutory consultation with local residents. This statutory consultation requires an advertisement of the application in a local paper and the display of a pale blue notice on the premises. Failure to adhere to the statutory consultation will result in an invalid application and/or extension of the statutory consultation period.
- 5.18 A list of responsible authorities can be found in Appendix 1. However, an up to date list of Responsible Authorities with contact details can be found here:
https://www.towerhamlets.gov.uk/lgnl/business/licences/alcohol_and_entertainment/Responsible-Authorities.aspx
- 5.19 Following consultation, the Licensing Authority decided it will contact all residents and businesses within 40 meters of the applicant's premises, where the application is for a new club or premises licence or its variation. The consultation will be strictly neutral and will repeat the information required in the statutory notification.
- 5.20 For larger events and premises of a capacity of more than 1000 persons the Council will carry out a reasonable and relevant level of consultation with local residents and businesses.
- 5.21 In respect of paragraphs 5.19 and 5.20 above, should the Licensing Authority, in the unlikely event, fail to carry out the voluntary consultation within the statutory consultation period, this will not be grounds for refusing or delaying any application. The Licensing Authority can only refuse or delay (restart the consultation period) where it receives an invalid application or where the applicant fails to comply with the statutory consultation requirements.

6 The Licensing Authority as a Responsible Authority

- 6.1 The Council as a licensing authority is now included in the list of responsible authorities under the Licensing Act 2003.

- 6.2 The 2003 Act does not require responsible authorities to make representations about applications for the grant of premises licences or to take any other steps in respect of different licensing processes.
- 6.3 The Council as a Licensing Authority is not expected to act as a Responsible Authority on behalf of other parties (for example, local residents, local Councillors or community groups) although there are occasions where the authority may decide to do so. Such parties can make relevant representations to the licensing authority in their own right, and it is reasonable for the licensing authority to expect them to make representations themselves where they are reasonably able to do so. However, if these bodies have failed to take action and the licensing authority is aware of relevant grounds to make a representation, it may choose to act in its capacity as responsible authority.
- 6.4 It is also reasonable for the Council as a licensing authority to expect that other responsible authorities should intervene where the basis for the intervention falls within the remit of that other responsible authority. For example, the police should make representations where the representations are based on concerns about crime and disorder. Likewise, it is reasonable to expect the local authority exercising environmental health functions to make representations where there are concerns about noise nuisance. Each responsible authority has equal standing under the 2003 Act and may act independently without waiting for representations from any other responsible authority.
- 6.5 The 2003 Act enables the Council as a licensing authorities to act as a responsible authority as a means of early intervention; it may do so where it considers it appropriate without having to wait for representations from other responsible authorities. For example, the licensing authority may (in a case where it has applied a cumulative impact policy) consider that granting a new licence application will add to the cumulative impact of licensed premises in its area and therefore decide to make representations to that effect, without waiting for any other person to do so.
- 6.6 The Council recognises that in cases where it as the licensing authority is also acting as responsible authority in relation to the same process, it is important to achieve a separation of responsibilities within the authority to ensure procedural fairness and eliminate conflicts of interest.
- 6.7 The officer advising the licensing committee (i.e. the authority acting in its capacity as the licensing authority) must be a different individual to the officer who is acting for the responsible authority.

- 6.8 The officer acting for the responsible authority should not be involved in the licensing decision process and should not discuss the merits of the case with those involved in making the determination by the licensing authority. For example, discussion should not take place between the officer acting as responsible authority and the officer handling the licence application regarding the merits of the case. Communication between these officers in relation to the case should remain professional and consistent with communication with other responsible authorities. Representations, subject to limited exceptions, must be made in writing.
- 6.9 At the outset, of an application, or another licensing process a Licensing Officer in the Licensing Team will be allocated to act as the Licensing authority acting as a responsible authority. This licensing officer is not involved in the application process but sets up a separate record to consider the application for the authority in its capacity as responsible authority, engaging with other responsible authorities where appropriate and determining whether the authority acting as a responsible authority wants to make a representation. In certain circumstances the officer acting for the Licensing Authority as a Responsible Authority will be an officer from another team.

7 Home Office as a Responsible Authority

- 7.1 From 6th April 2017 the provisions of Immigration Act 2016 which relate to Licensing became effective. These provisions amend the Licensing Act 2003 making the Secretary of State a responsible authority in respect of premises licensed to sell alcohol or late night refreshment. In effect this conveys the role of responsible authority to Home Office Immigration Enforcement who exercises the powers on the Secretary of State's behalf. For contact details please see the list of Responsible Authorities in Appendix 1.

When Immigration Enforcement exercises its powers as a responsible authority it will do so in respect of the prevention of crime and disorder licensing objective because it is concerned with the prevention of illegal working or immigration offences more broadly.

- 7.2 From 6th April 2017 Licensing Authorities will check the eligibility to work for those applying for personal licences and premises licences (where the applicant is an individual) for the sale of alcohol and late night refreshment (hot food or drink between 23:00 and 05:00 hours).

This does not apply to the licensable activity of Regulated Entertainment ONLY or Club premises certificate and temporary event notices (TEN). However, they will commit a criminal offence if they work illegally.

7.3 Applications for a personal or premises (where they are an individual) licence (for sale of alcohol/provision of late night refreshment) must be able to satisfy the Licensing Authority that they have permission to be in the United Kingdom (UK), and are entitled to undertake work relating to the carrying on of a licensable activity. Essentially this means that licence cannot be granted to disqualified persons who are:

- Unlawfully present in the UK,
- Not permitted to work in the UK,
- Permitted to work, but not in this licensable activity.

Applications from disqualified persons above will be classed as invalid and will be rejected.

7.4 The application for personal and premises licences must submit one of the documents listed in Annex A of the Home Office's Employer right to work checks supporting guidance (<https://www.gov.uk/government/publications/right-to-work-checks-employers-guide>) with their application, to show that they have the right to work in the UK and to undertake work in a licensable activity. Applicants may provide photocopies or scanned copies of the documents, which do not need to be endorsed as a copy of the original. Applicants are not required to submit original copies of documents. As an alternative to using one of the documents listed in the above guidance, applicants may choose to demonstrate their right to work by allowing this Licensing Authority to carry out a check with the Home Office online right to work checking service. As a result, we invite applicants to provide their shared code in their application. This code along with the applicant's date of birth allows this Licensing Authority to check their immigration status via the online service (<https://www.gov.uk/view-right-to-work>).

7.5 Where an applicant has restrictions on the length of time they may work in the UK, a premises licence or personal licence may still be issued, but the licence will cease to have effect when the right to work lapses.

7.6 A premises or personal licence issued in respect of an application made on or after 6 April 2017 will lapse if the holder's permission to live or work in the UK comes to an end. The licensing authority is under no duty to carry out on-going immigration checks to see whether a licence-holder's permission to be in the UK has been brought to an end, and the Act does not place a duty on the licensing authority to withdraw or revoke the licence if this occurs.

7.7 The Home Office as a Responsible Authority may request a review of a licence,

where a licence is prejudicial to the prevention of illegal working. This may be as a result of:

- An enforcement operation or data sharing that identifies a relevant offence,
- The issue of a civil penalty for employing illegal workers,
- The identification of a licence holder whose leave to be in the UK, or their permission to work, has come to an end.

8 Representations by “Other Persons”

8.1 Other person includes any individual, body or business.

8.2 Representations against or for an application must be in writing, either by post or email. For it to be considered as a valid representation it must:

- a) Be “relevant”, in that it states the reasons for making the representation, which must include how the proposed licence will have an effect or potential effect of the on one or more of the four licensing objectives (see section 5 above),
- b) Include name and full postal address of the person making the representation (Anonymous representations will not be accepted).
- c) Not be frivolous or vexatious (i.e. concerns issues which, at most, are minor and in relation to which no remedial steps would be warranted or proportionate; or appears to be intended to cause aggravation or annoyance, whether to a competitor or other person, without reasonable cause or justification).

8.3 Other persons can also request a representative to make the representation on their behalf. A representative may include a legal representative, a friend, a Member of Parliament, or a local councillor who can all act in such a capacity. In such cases all dialogue and correspondence will be with the Representative.

8.4 Representations and Disclosure of personal details

Once a valid representation is received unless it is withdrawn by the person/body etc. making the representation the decision on whether to grant the licence/authorisation must be referred to the Licensing Sub-Committee. The Licensing Authority when giving a notice of a hearing to an applicant, is required under the Licensing Act 2003 (Hearings) Regulations 2005 to provide the applicant

with copies of the relevant representations that have been made.

The Licensing Authority must provide all representations to the applicant unredacted as required by the above legislation. The only exception to this is where licensing authorities consider that the person who has made the representation has a genuine and well-founded fear of intimidation. In such circumstances the Licensing Authority will follow the Secretary of State's Guidance and the House of Commons Briefing Paper, dated 6th July 2018: Alcohol: objecting to a licence. In these circumstances the Licensing Authority may decide to withhold some or all of the person's personal details from the applicant, giving only minimal details (such as street name or general location within a street). However, withholding such details will only be considered where the circumstances justify such action.

9 Crime and Disorder

- 9.1 Licensed premises, especially those offering late night / early morning entertainment, alcohol and refreshment for large numbers of people, can be a source of crime and disorder problems and to store prescribed information.
- 9.2 When addressing crime and disorder the applicant should initially identify any particular issues (having regard to their particular type of premises and / or activities) which are likely to adversely affect the promotion of the crime and disorder licensing objective. The applicant should also list such steps that are required to deal with these identified issues. Both risks and mitigating steps should be included within the applications operating schedule. Where the Metropolitan Police, acting as a responsible authority, makes recommendations in respect of an application relating to the licensing objectives the Licensing Authority would expect the applicant to incorporate these into their operating schedule.
- 9.3 Applicants are recommended to seek advice from Council Officers and the Police as well as taking into account, as appropriate, local planning and transport policies, with tourism, cultural and crime prevention strategies, when preparing their plans and Schedules.
- 9.4 In addition to the requirements for the Licensing Authority to promote the licensing objectives, it also has duties under Section 17 of the Crime and Disorder Act 1998 to do all it reasonably can to prevent crime and disorder in the Borough and to share prescribed information.
- 9.5 The Licensing Authority, if its discretion is engaged, will consider attaching Conditions to licences and permissions to deter and prevent crime and disorder both inside and immediately outside the premises and these may include Conditions

drawn from the Model Pool of Conditions relating to Crime and Disorder given in the Secretary of State's Guidance.

- 9.6 **CCTV** - The Licensing Authority, if its discretion is engaged, will attach conditions to licences, as appropriate where the conditions reflect local crime prevention strategies, for example the provision of closed circuit television cameras.
- 9.7 **Touting** – This is soliciting for custom. There has been a historic problem with Touting in the borough, mainly in relation to restaurants, and as such in 2006 the Council introduced a byelaw under Section 235 of the Local Government Act 1972 for the good rule and government of the London Borough of Tower Hamlets and for the prevention and suppression of nuisances.

As a result, in relation to premises where there is intelligence that touting is, or has been carried out, the Licensing Authority, where its discretion is engaged, will insert a conditions from our model conditions in appendix 2, to prohibit 'touting':-

- 9.8 **Responsible Drinking** - The Licensing Authority expects alcohol to be promoted in a responsible way in the Borough. This should incorporate relevant industry standards, such as the Portman Group Code of Practice. Where appropriate and proportionate, if its discretion is engaged, the Licensing Authority will apply conditions to ensure responsible drinking. The Licensing Authority also recognises the positive contribution to best practice that "Pubwatch" and other similar schemes can make in promoting the licensing objectives and is committed to working with them.
- 9.9 **Psychoactive Substances, e.g. Nitrous Oxide (NOx)** – Misuse of nitrous oxide is associated with increased antisocial behaviour including littering, noise nuisance and vandalism, all of which are detrimental to residents' quality of life and feelings of safety. Use of nitrous oxide is also a health concern and has other associated harms.

As a result, this Licensing Authority expects Licence Holders to refuse entry to any person seen use or selling NOx as a psychoactive Substance. Refusals should also be entered into Licence Holders refusals logs.

Where its discretion is engaged this Licensing Authority impose conditions to formally require refusal of persons seen selling or using NOx as a psychoactive Substance.

- 9.10 **Drinks spiking** – in reference to the Local Governments Association (LGA) Guidance note on drink spiking prevention, this Licensing Authority expects licence holders and applicants to have a zero-tolerance policy towards drinks spiking. This involves as a minimum ensuring all reports of spiking are acted upon and that all incidents of alleged spiking are recorded and reported to the police. Licence holders and applicants should also be aware of the Metropolitan Police’s definition of drink spiking:

“Spiking is where someone adds drugs or alcohol to another person’s drink without them knowing, it is illegal.”

The LGA has set some recommendations for Licence holder, and we would expect our Licence holders to follow these where appropriate to their venues:

<https://www.local.gov.uk/publications/lga-guidance-note-drink-spiking-prevention#recommended-actions-for-licensed-premises->

Applicants for new and variations of exiting licences as well as those submitting TENs are expected to work with the Metropolitan Police in order to consider actions needed to prevent drinks spiking in their venues/events

Where its discretion is engaged this Licensing Authority will impose conditions on licences aimed at preventing drinks spiking, specifically any recommended by the metropolitan police.

- 9.11 **Welfare and Vulnerability** – This Licensing Authority believes that all Licensed venues should train their staff in Welfare and Vulnerability Engagement (WAVE). As of 2023 this Licensing Authority in partnership with the Metropolitan Police and the London Borough of Hackney is delivering monthly WAVE training sessions for Licensed venues within both Tower Hamlets and Hackney. As a result, we expect that all Licensed venues who sell alcohol for consumption on their premises should train their staff in WAVE and adopt Ask for Angela or similar initiatives aimed at assisting vulnerability within alcohol licensed venues.

- 9.12 **Sexual Harassment in the Night Time Economy** – sadly this is still an issues for women working in and visiting licensed venues in London. As a result, this Licensing Authority encourages Licensed venues to sign up to the Mayor of London’s Women’s Night Safety Charter:

<https://www.london.gov.uk/programmes-strategies/arts-and-culture/24-hour-london/womens-night-safety-charter>

As well as the Women's Night Safety Charter we would encourage applicants and licence holders to discuss applications with the Council's Violence Against Women and Girls Service, who can provide advice and training to venues on preventing misogyny within licensed premises.

Lastly, we expect Licence Holders to take a zero-tolerance approach to misogyny within their venues where this is towards customers or employees. We would expect licence holders to refuse to serve persons who commit acts of sexual harassment, even in the first instance, and report the matter to the Metropolitan Police.

9.13 **Party Boats** – An increasing number of complaints have been received in London Boroughs that border the River Thames in relation to “Party Boats”, which use the River. In respect of this we would encourage applicants for Party Boats to consider adopting the conditions listed in our Model Conditions in Appendix 3, where appropriate to promote the Licensing Objective of Prevention of Crime and Disorder. Furthermore, where its discretion is engaged, this Licensing Authority may add one or more of the boat conditions from our Model Conditions.

9.14 **Criminal Activity** - There is certain criminal activity that may arise in connection with licensed premises which the Licensing Authority will treat particularly seriously. These are the use of the licensed premises:

- for the sale and distribution of drugs controlled under the Misuse of Drugs Act 1971 and the laundering of the proceeds of drugs crime;
- for the sale and distribution of illegal firearms;
- for the evasion of copyright in respect of pirated or unlicensed films and music, which does considerable damage to the industries affected;
- for the illegal purchase and consumption of alcohol by minors which impacts on the health, educational attainment, employment prospects and propensity for crime of young people;
- for prostitution or the sale of unlawful pornography;
- by organised groups of paedophiles to groom children;
- as the base for the organisation of criminal activity, particularly by gangs;
- for the organisation of racist activity or the promotion of racist attacks;
- for employing a person who is disqualified from that work by reason of their immigration status in the UK;
- for unlawful gambling; and
- for the sale or storage of smuggled tobacco and alcohol.

The Secretary State's Guidance states that it is envisaged that licensing authorities, the police, the Home Office (Immigration Enforcement) and other law enforcement agencies, which are responsible authorities, will use the review procedures effectively to deter such activities and crime. Where reviews arise and this Licensing Authority determines that the crime prevention objective is being undermined through the premises being used to further crimes, it is expected that revocation of the licence, even in the first instance, should be seriously considered.

- 9.15 The Licensing Authority is mindful of the Secretary of State's Guidance "Reviews arising in connection with crime".
- 9.16 From 1 April 2017, businesses which sell alcohol (for example, retailers of alcohol and trade buyers) will need to ensure that the UK wholesalers that they buy alcohol from have been approved by HMRC under the Alcohol Wholesaler Registration Scheme (AWRS). They will need to check their wholesalers Unique Registration Number (URN) against the HMRC online database which will be available from April 2017. This is an ongoing obligation and if a business is found to have bought alcohol from an unapproved wholesaler, they may be liable to a penalty or could even face criminal prosecution and their alcohol stock may be seized. Any trader who buys alcohol from a wholesaler for onward sale to the general public (known as a 'trade buyer') does not need to register unless they sell alcohol to other businesses. Examples of trade buyers would be pubs, clubs, restaurants, cafes, retailers, and hotels. However, they will need to check that the wholesaler they purchase alcohol from is registered with HMRC. Further information may be found at: <https://www.gov.uk/guidance/the-alcohol-wholesaler-registration-scheme-awrs>.
- 9.17 **Smuggled Goods** – The Licensing Authority will exercise its discretion to add conditions to licence where appropriate and proportionate to reduce the risk of receiving smuggled goods and encourage traceability.
- 9.18 **Olympic Park (Football Ground)** – Premises where Police intelligence shows that football supporters congregate within the borough should consider adding the Olympic Park – Football Ground conditions in our Model Conditions in appendix 3.

10 Public Safety

- 10.1 The 2003 Act covers a wide range of premises that require a licence, and so such premises present a mixture of risks to users and should be constructed or adapted and operated so as to acknowledge and safeguard occupants against these risks.

- 10.2 The Licensing Authority will expect Operating Schedules to satisfactorily address these issues and applicants are advised to seek advice from the Council's Environmental Health (Health & Safety) Officers and the London Fire Brigade before preparing their plans and Schedules.
- 10.3 Where an applicant identifies an issue in regard to public safety (including fire safety) which is not covered by existing legislation, the applicant should identify in their operating schedule the steps that will be taken to ensure public safety. This needs to take into account any unique characteristics that arise in connection with the licensable activity, any requirements that are specific to the premises.
- 10.4 One of the Council's Community Safety Partnership Priorities is tackling violence against women and girls. As a result the Licensing Authority expects Licence holders to take a proactive approach to customer safety including the following:
- Making provisions to ensure that customers safely leave their premises, for example providing information on licensed taxi companies, adequate lighting outside the premises,
 - Training of staff in spotting signs of harassment, and how to intervene where safe and appropriate to do so, and/or reporting such harassment to management/emergency services.
- The Licensing Authority may be able to sign post Licence Holders in regard to local/national safeguarding schemes which may assist with the above.
- 10.5 The Licensing Authority, where its discretion is engaged, will consider attaching proportionate and appropriate Conditions to licences and permissions to promote safety, and these may include Conditions drawn from a the Model Pool of Conditions found in the Secretary of States Guidance.
- 10.6 The Licensing Authority will impose conditions that relate to its licensing objectives, and in a way that is proportionate to the individual circumstances of the premises seeking a licence.
- 10.7 Martyn's Law – This will place a requirement on those responsible for certain locations/premises to consider the threat from terrorism and implement appropriate and proportionate mitigation measures, see link below. Numerous licensed premises within the borough may fall within the scope of this legislation. The law is likely to come into force in 2024/25, or sooner. Thus, Licence holders and applicants should consider the threat from terrorism and implement appropriate and proportionate mitigation measures. In particular they should consider completing Police ACT Training: <https://ct.protectuk.police.uk/>

<https://www.protectuk.police.uk/news-views/martyns-law-what-you-need-know>

11 Prevention of Public Nuisance

- 11.1 Licensed premises, especially those operating late at night and in the early hours of the morning, can cause a range of nuisances impacting on people living, working or sleeping in the vicinity of the premises.
- 11.2 Like many London boroughs, Tower Hamlets has many areas of the borough where businesses and residents are “cheek by jowl” with each other. Thus, the correct balance needs to be adopted ensuring residents are not unduly disturbed by licensed premises, whilst ensuring this does not stifle growth in the licence trade.
- 11.3 Though all licensed premises must promote the licensing objectives, and thus actively try to prevent public nuisance being caused by their licensable activities, there are some factors that this Licensing Authority would expect to applicants to consider and where appropriate address in their operating schedule. These are:
- a) Music/performances
Measures to reduce impact of noise on residents
 - b) Queue management
Measure to prevent obstruct access to properties, pavements. Measure to reduce the impact of people noise on residents
 - c) Ingress and Egress
Measure to prevent people noise during ingress and egress
 - d) Use of outside areas (see 11.7 below)
 - e) Deliveries, particularly pick-ups by vehicles
Measures to prevent noise/fumes from engines, drivers (including smoking),
 - f) Bottle disposal
Done at reasonable time to prevent impact on residents e.g. between 8am and 8pm
 - g) Litter
Measures to prevent littering around the venue from patrons
- 11.4 The Licensing Authority appreciates that it would not be necessary or appropriate for all applications to have measures to prevent the above issues. Nevertheless, we will take a strong view on applications for licences that are in close proximity to residential premises, and whose intended use has a higher likelihood of causing public nuisance. This also includes those applications in areas covered by a Cumulative Impact Assessment (CIA). Especially where the applications falls

outside the scope of any exceptions to such CIAs.

- 11.5 The Licensing Authority, where its discretion is engaged, will consider, where appropriate, attaching conditions to licences and permissions to prevent the problems identified listed above, or any other conditions it considered appropriate and proportionate to promote the licensing condition of prevention of public nuisance.
- 11.6 **Street Furniture** – placing of street furniture, which includes advertising boards, on the highway can cause a public nuisance by way of obstruction or encourage consumption of alcohol on an unlicensed area. The Licensing Authority expects applicants to have ensured that they fully comply with the Council's rules relating to authorisation of obstructions on the highway, and that the required authorisations are obtained prior to submitting a licence application. Where proportionate and appropriate, and its discretion is engaged, the Licensing Authority will impose conditions in relation to street furniture, including on private land.
- 11.7 **Fly Posting** – The Council has experienced problems with "fly posting" in relation to venues that offer entertainment. Fly posting is the unauthorised posting of posters / advertisements etc. Where it considers it proportionate and appropriate, and its discretion is engaged, the Licensing Authority will attach conditions relating to the control of fly posting to ensure that venues clearly prohibit all fly posting in their contract terms with others and they effectively enforce this control.
- 11.8 **Beer Gardens and outside areas** – since the ending of the restrictions imposed during the Coronavirus pandemic, we have seen an increase in the use of outside areas. This has also been encouraged by Government under the Business and Planning Act 2020. We want to strike the right balance between allowing businesses to thrive whilst still protecting residents of the borough from being unduly disturbed by the night time economy. Hence, we would encourage applicants to address this concern in their operating schedule by detailing what mitigating measures they intend to adopt to reduce any disturbance the use of the outside area is likely to have on neighbouring residents. Such measures could include:
- limiting the amount of patrons permitted in the outside area, and/or,
 - restricting the use of areas after a certain time,
 - ceasing its use after a certain time.

Where disturbance of residents from outside areas is likely, and where its discretion is engaged, this Licensing Authority may add conditions limiting the numbers of persons permitted to use any outside areas, and/or seek to cease the use of any outside areas after 21:00 hours.

- 11.9 **Party Boats** – An increasing number of complaints have been received in London Boroughs that border the River Thames in relation to “Party Boats”, which use the River. In respect of this we would encourage applicants for Party Boats to consider adopting the “Boat” conditions, listed in our Model Conditions in Appendix 3, where appropriate to promote the Licensing Objective of Prevention of Public Nuisance. Furthermore, where disturbance of residence from these party boats is likely, and where its discretion is engaged, this Licensing Authority may add one or more of the boat conditions from our Model Conditions.

12 Prevention of Harm to Children

- 12.1 The wide range of premises that require licensing means that children can be expected to visit many of these, often on their own, for food and/or entertainment. The protection of children from harm includes the protection of children from moral, psychological and physical harm. This includes not only protecting children from the harms associated directly with alcohol consumption but also wider harms such as exposure to strong language and sexual expletives (for example, in the context of exposure to certain films or adult entertainment). Home Office Guidance also expects Licensing authorities to consider the need to protect children from sexual exploitation when undertaking licensing functions.
- 12.2 Tackling Child Sexual Exploitation (CSE) is a key target both locally and nationally as such the Licensing Authority expects Licence Holders to:
- Understand that there are criminal offences in relation to sexual exploitation of a child,
 - Ensure that they and their employees have a basic awareness of the signs of CSE and how to report it;
 - Report any concerns to the appropriate authorities or to the Licensing Authority can advise them of the appropriate authority to report concerns to.
- 12.3 Applicants are to consult with the Responsible Authority designated for Child Protection listed in Appendix 1 - List of Responsible Authorities of this who this Licensing Authority recognises to be competent body to advise on the protection of children from harm.
- 12.4 The Act does not prohibit children from having access to any licensed premises; the Council recognises that limitations may have to be considered where it appears necessary to protect children from harm.

12.5 The Licensing Authority will judge the merits of each separate application before deciding whether to impose conditions limiting the access of children to individual premises. The following are examples of premises that will raise concern:-

- Where there have been convictions, Fixed Penalty Notices (FPNs) or formal cautions for serving alcohol to minors or with a reputation for underage drinking
- With a known association with drug taking or dealing
- Where there is a strong element of gambling on the premises
- Where entertainment of an adult or sexual nature is provided
- Where irresponsible drinking is encouraged or permitted.

12.6 Where its discretion is engaged, the Licensing Authority will consider any of the following options when dealing with a licence application where limiting the access of children is considered necessary to prevent harm to children:

- Limitations on the hours when children may be present,
- Limitations on ages below 18,
- Limitations or exclusion when certain activities are taking place,
- Requirements for an accompanying adult,
- Full exclusion of people under 18 from the premises when any licensable activities are taking place.

12.7 No conditions will be imposed requiring that children must be admitted to any premises and, where no limitation is imposed, this will be left to the discretion of the individual licensee.

12.8 The Act details several offences designed to protect children in licensed premises and the Licensing Authority will work closely with the police to ensure the appropriate enforcement of the law, especially relating to the sale and supply of alcohol to children.

- 12.9 All licence holders will be expected to comply the Portman Group Code of Practice, and in particular the Retailer Alert Bulletin by which the Portman Group informs licensed retailers, which products have been found to be in breach of the code and should be removed from sale.
- 12.10 The Licensing Authority expects all licensed suppliers of alcohol to have robust measures, effectively managed and monitored, in place to ensure that minors are fully protected from harm. This will require operating plans to specify these measures and management controls taking into account paragraph 10.1 and 10.2 above. Where appropriate a written childcare policy should be available and be incorporated in the induction of staff.
- 12.11 The Licensing Authority will take appropriate and proportionate action where there are serious concerns in relation to the safeguarding of children in connection with a licensed premises. This may include consideration of applying for a review of the licence where there is significant evidence of undermining the licensing objective of the protection of children from harm.
- 12.12 The sale of alcohol to a minor is a criminal offence and Trading Standards will conduct appropriate test purchasing exercises and will take account of any complaints and intelligence received. The Act permits the use of children under the age of 18 to undertake test purchases.
- 12.13 Where its discretion is engaged this Licensing Authority will consider refusal/revocation in the first instance where test purchases have found venues selling age restricted products to children.
- 12.14 Where there are age restrictions imposed by the Act on the licensable activities in respect of children below a certain age, then the licensee will be required to demonstrate that they have age verification systems in place. This Licensing Authority believes that that Licensed Premises should have age verification policies to require individuals who appear to the person serving alcohol to be under the age of 25 years of age to produce on request appropriate identification. This is commonly referred to as the “Challenge 25 Scheme”. The rationale for this is because it can often be difficult to judge how old teenagers are and “Challenge 25 age verification system” would provide licensed premises with margin of error to prevent underage sales. Thus Challenge 25 can help to empower staff to challenge customers where there is doubt about their age. In turn this is likely to reduce the risk of the owner, or the seller of the alcohol, committing an offence.

- 12.15 Training in age verification systems should be given to all persons who might be in a position to serve or refuse the sale of alcohol to children. The training should include a basic understanding of the law, seeking proof of age, verifying the authenticity of proof of age cards and handling and recording refusals.
- 12.16 Where proportionate and appropriate, and its discretion is engaged, the Licensing Authority will impose “Challenge 25” conditions from our model conditions in appendix 3.
- 12.17 Where proportionate and appropriate, and its discretion is engaged, the Licensing Authority will impose the “Online Deliveries” conditions from model conditions in appendix 3 to ensure adequate age verification systems.

13 Access to Cinemas

- 13.1 Films cover a vast range of subjects, some of which deal with adult themes and / or contain, for example, scenes of horror or violence that may be considered unsuitable for children within certain age groups.
- 13.2 In order to prevent children from seeing such films, the Licensing Authority will impose conditions requiring licensees to restrict children from viewing age restricted films classified according to the recommendations of the BBFC.

14 Children and Public Entertainment

- 14.1 Many children go to see and / or take part in an entertainment arranged substantially for them. Consequently, additional arrangements are required to safeguard them at such times.
- 14.2 Where 12.1 applies, and its discretion is engaged, the Licensing Authority will require the following arrangements in order to control their access and egress and to assure their safety: -
- An adult member of staff to be stationed in the vicinity of each of the exits from any level, subject to there being a minimum of one member of staff per 50 children or part thereof,
 - No child unless accompanied by an adult to be permitted in the front row of any balcony,
 - No standing to be permitted in any part of the auditorium during the

Performance.

- 14.3 Where children are taking part in any regulated entertainment, and its discretion is engaged, the Licensing Authority will require the operating schedule to clearly state the steps taken to assure their safety.
- 14.4 Where its authority is engaged, the Licensing Authority will consider attaching conditions to licences and permissions to prevent harm to children, and these may include conditions drawn from the Model Pool of. Conditions that can be found in the Secretary of State's Guidance.

15 Health Considerations of Licensing

- 15.1 Excess alcohol consumption can lead to a wide range of personal health related harms which are well documented in both the Alcohol Joint Strategic Needs Assessment factsheet and Tower Hamlets Substance Misuse Strategy. The short-term negative health effects of hazardous drinking can include impaired senses, mood or personality changes, loss of consciousness and an increased risk of injury and accidents, while regular alcohol consumption can lead to heart disease, stroke, liver disease, stomach damage and certain types of cancer. Although these are important personal health related harms, they, by and large, fall outside the scope of the four licensing objectives as defined in the Licensing Act.
- 15.2 However, the consequences of drinking go far beyond the individual drinker's health and well-being. They include harm to the unborn fetus, acts of drunken violence, vandalism, sexual assault and child abuse, and a huge health burden carried by both the NHS and friends and family who care for those damaged by alcohol. Many of these affects are relevant to the licensing regime.
- 15.3 The short-term negative health effects of harmful drinking can include impaired senses, mood or personality changes, loss of consciousness and an increased risk of injury and accidents.

16 Licensing Hours

- 16.1 This Part of the Policy Statement details the Licensing Authority's approach to licensing hours. It states the reasons for the policy and identifies the issues the Licensing Authority will take into account when considering applications during the framework hours. This only applies where the Licensing Authority's is engaged.
- 16.2 The policy set out in this Part applies to applications for:-
 - a new premises licence;

- a new club premises certificate;
- variation of a converted premises licence;
- variation of an existing premises licence;
- variation of a converted club registration certificate; and
- variation of an existing club premises certificate where relevant representations are made.

16.3 The policies set out in this Part may, depending on the circumstances of the application, apply to applications for a provisional statement.

16.4 Any condition setting out the hours of premises refers to the hours during which alcohol may be sold or supplied, or (as appropriate) the hours during which other licensable activities may take place pursuant to the premises licence or club premises certificate. In attaching conditions on hours, the Licensing Authority will generally require that customers should not be allowed to remain on the premises later than half an hour (30 minutes) after the cessation of licensable activities.

16.5 Tower Hamlets has a number of licensed venues that already have extended licensing hours. It also borders other London councils that have high concentrations of licensed premises including premises with extended licensing hours.

16.6 The Licensing Authority considers that the possibility of disturbance to residents late at night and in the early hours of the morning, and the effect that any such disturbance may have, is a proper matter for it to consider when addressing the hours during which licensable activities may be undertaken.

16.7 The Licensing Authority is concerned to ensure that extended licensing hours do not result in alcohol-related antisocial behaviour persisting into the night and early hours of the morning. For these reasons, applications to carry on licensable activities at any time outside the framework hours will be considered on their own merits with particular regard to the matters set out in the Policy section below.

16.8 The Licensing Authority has had regard to the Guidance to the Act when determining this policy. The end times set out in the policy are not (and should not be regarded as) the 'usual' or 'normal' terminal hour for licensable activities in the Borough. Instead, the 'framework hours' serve to identify cases where the Licensing Authority will pay particular regard to the likely effect on the local neighbourhood of carrying out the proposed licensable activities during the hours applied for. Applications for hours up to the end of the Framework Hours will not automatically be granted. This policy will be applied only where relevant representations are made. Each case will be considered on its merits.

- Sunday – 06:00 hours to 22:30 hours

- Monday to Thursday – 06:00 hours to 23:30 hours
- Friday and Saturday – 06:00 hours to 00:00 hours (midnight)

Applications in respect of premises licences and club premises certificates to authorise licensable activities outside the framework hours, and in respect of which relevant representations are made, will be decided on their own merits and with particular regard to the following.

- a) The location of the premises and the general character of the area in which the premises are situated. (i.e., does the area include residential or business premises likely to be adversely affected).
- b) The proposed hours during which licensable activities will be take place and the proposed hours during which customers will be permitted to remain on the premises.
- c) The adequacy of the applicant's proposals to address the issues of the prevention of crime and disorder **and** the prevention of public nuisance.
- d) Where the premises have been previously licensed, the past operation of the premises.
- e) Whether customers have access to public transport when arriving at or leaving the premises at night time and in the early hours of the morning.
- f) The proximity of the premises to other licensed premises in the vicinity and the hours of those other premises.

16.9 Applicants who apply for authorisation to carry on licensable activities, throughout the entirety of the hours outside the framework hours, when they do not intend to operate at these times run a risk that Responsible Authorities and interested parties may be more inclined, than they might otherwise be, to make relevant representations about the application.

Although this policy applies to all licensable activities, the Licensing Authority will have regard to the proposed use of the premises when considering applications to carry on licensable activities outside the framework hours. Subject to any relevant representations that may be made to the contrary in individual cases, premises where the following licensable activities are authorised are not considered to make a significant contribution to the problems of late-night antisocial behaviour, and as such these premises will generally have greater freedom to operate outside the framework hours. These premises are:-

- Theatres,
- Cinemas,

- Premises with a club premises certificate.

16.10 In addition, and in relation to all applications, whatever the hours applied for where its discretion is engaged, the Licensing Authority will generally deal with the issue of licensing hours having due regard to the individual merits of each application. However, consideration will be given to imposing stricter conditions in respect of noise control where premises are situated close to local residents.

16.11 Where a negative impact is likely on local residents or businesses it is expected that the applicants' operating schedule will describe how this impact will be minimised.

17 Shops, Stores and Supermarkets

17.1 The Licensing Authority will generally licence shops, stores and supermarkets to sell alcohol for consumption off the premises at any times they are open for shopping.

17.2 However, where the Licensing Authority's discretion is engaged, it may consider restricting those hours in order to promote the licensing objectives. For example, where representations provide evidence of crime and disorder, or public nuisance linked to the premises.

17.3 **Psychoactive Substances, e.g. Nitrous Oxide (NOx)** – Misuse of nitrous oxide is associated with increased antisocial behaviour including littering, noise nuisance and vandalism, all of which are detrimental to residents' quality of life and feelings of safety. Use of nitrous oxide is also a health concern and has other associated harms.

17.4 Where its discretion is engaged this Licensing Authority will consider refusal/revocation in the first instance where there is evidence that a shop, supermarket, or store is or has been selling Psychoactive Substances.

18 Integrating Strategies and Avoiding Duplication

18.1 The Council's licensing function relates, in broad terms to a number of other matters in particular;

- Local crime prevention,
- Planning,
- Transport,
- Tourism,
- Cultural strategies,

- The night time economy.
- 18.2 The Licensing Authority will set up multi-disciplinary working groups to ensure proper integration of local crime prevention, planning, transport, tourism, cultural and night time economy strategies.
- 18.3 The Licensing Authority will arrange for protocols with the Borough Police to enable them to report to the Committee responsible for transport matters on the need for the swift and safe dispersal of people from relevant venues in the Borough.
- 18.4 Arrangements will be made for the Licensing Committees to receive reports on the following matters to ensure these are reflected in their decisions:
- The needs of the local tourist economy and cultural strategy for the Borough, and
 - The employment situation in the Borough and the need for investment and employment where appropriate,
 - The night time economy, its economic contribution to the Borough and the Council's strategy for its development and management. As the Council develops its policy towards the night time economy, through Community Plans or Town Centre Plans and Core Strategies, otherwise the Licensing Policy will be reviewed as necessary.
- 18.5 Licensing and Planning are two separate regimes. As a matter of law the Licensing Authority could not refuse an application because of the absence of appropriate planning consent. However, the Licensing Authority would generally expect applicants to have planning and other permissions required for lawful operation of the premises in place at the time of the licensing application.
- 18.6 The planning and licensing regimes involve consideration of different (albeit related) matters. For instance, licensing considers public nuisance whereas planning considers amenity. As such licensing applications should not be a re-run of the planning application and should not cut across decisions taken by the local authority planning committee or following appeals against decisions taken by that committee. Licensing Committees are not bound by decisions made by a planning committee, and vice versa.
- 18.7 The granting by the Licensing Committee of any variation of a licence which involves a material alteration to a building would not relieve the applicant of the need to apply for planning permission or building control where appropriate.
- 18.8 There are also circumstances when as a condition of planning permission; a terminal hour has been set for the use of premises for commercial purposes. Where these hours are different to the licensing hours, the applicant must observe the

earlier closing time. Premises operating in breach of their planning permission would be liable to prosecution under planning law.

- 18.9 Applicants for new premise or club licences or variations of them are advised to consult the London Borough of Tower Hamlets' Planning Authority about any planning restrictions which may apply to their premises. The Planning website is
- 18.10 The responsible authorities are committed to avoid duplication with other regulatory regimes and the control measures contained in any conditions which are provided for in other legislation. This Policy does not intend to duplicate existing legislation and regulatory regimes that are already places obligations on employers and operators.
- 18.11 The power for licensing authorities to introduce an EMRO is specified in sections 172A to 172E of the 2003 Act which was amended by Section 119 of the Police Reform and Social Responsibility Act 2011. These provisions came into force on 31st October 2012.
- 18.12 Regulations prescribing the requirements in relation to the process for making an early morning restriction order (EMRO) were brought in force on 31st October 2012.
- 18.13 Guidance has been introduced in relation to:
- the EMRO process
 - the evidence base
 - introducing an EMRO
 - advertising an EMRO
 - dealing with representations
 - hearings
 - implementation
 - limitations
 - enforcement
- 18.14 The legislation gives licensing authorities discretion to restrict sales of alcohol by introducing an EMRO to restrict the sale or supply of alcohol to tackle high levels of alcohol related crime and disorder, nuisance and anti-social behaviour.
- 18.15 The order may be applied to the whole or part of the licensing authority area and if relevant on specific days and at specific times. The licensing authority must be satisfied that such an order would be appropriate to promote the licensing objectives.
- 18.16 The only exemptions relating to EMROs are New Year's Eve and the provision of

alcohol to residents in premises with overnight accommodation by means of mini bars and room service.

- 18.17 The decision to implement an EMRO should be evidence based and licensing authorities may wish to outline in the policy the grounds which they will take into consideration when considering implementation of an EMRO. This should include consideration of the potential burden imposed as well as the potential benefits. The Licensing Authority reserves the right to introduce an EMRO if it so desires and consultation and evidence from responsible authorities demonstrates the need.
- 18.18 The function of making, varying or revoking an EMRO is specifically excluded from the statutory delegation of functions to the Licensing Committee.

19 Late Night Levy

- 19.1 Following formal consultation in 2017 the Council introduced a Late Night Levy within the borough on 1st January 2018, with the levied hours being midnight to 6am (00:00 to 06:00 hours). The levy is a discretionary power, which this Council has adopted.
- 19.2 The legislative provisions relating to the late night levy are not part of the Licensing Act 2003 but are contained in the following legislation:
- Police Reform and Social Responsibility Act 2011, Chapter 2 of Part 2,
 - The Late Night Levy (Application and Administration) Regulations 2012,
 - The Late Night Levy (Expenses, Exemptions and Reductions) Regulations 2012.
- 19.3 The purpose of the levy is to assist local authorities and the police to manage and improve the night time economy. The money raised by the levy can be used for a range of activities and can be given to other agencies where they can assist in the reduction of crime and disorder, promotion of public safety, reduction or prevention of public nuisance, and cleaning of highways or land in the Borough.
- 19.4 The Late Night Levy will be applied in accordance with this Policy, having regard to the governing legislation and Home Office Guidance issued on 24th March 2015 in relation to the Late Night Levy (or any subsequent guidance).
- 19.5 From 1st January 2018 holders of premises licences or club premises certificates that are authorised by their licence for the sale/supply of alcohol (on and/or off sales) between the levied hours (00:00 to 06:00 hours) must pay the levy. This will apply whether the hours detailed in such licences for the sale/supply of alcohol are used or not.

For example, where a licence permits the sale/supply of alcohol until 02:00 hours

(i.e. within the levied hours), however the premises closes regularly at 23:30 hours they will still be liable to pay the levy unless eligible for an exemption, see list of exemptions below.

- 19.6 The amount of the levy is set by the UK Government and is a yearly amount between £299 and £4,440 depending on the rateable value of the premises and the their actual use. See table below:

Rateable Value Bands (based on the existing fee bands)	A No rateable value to £4,300	B £4,301 to £33,000	C £33,001 to £87,000	D £87,001 to £125,000	E £125,001 and above	D x 2 Multiplier applies to premises in category D that primarily or exclusively sell alcohol	E x 3 Multiplier applies to premises in category E that primarily or exclusively sell alcohol
Levy Charges	£299	£768	£1,259	£1,365	£1,493	£2,730	£4,440

- 19.7 The Licensing Authority will collect the levy from those premises liable to pay it at the same time as the Premises Licence or Club Premises Certificate annual fee.
- 19.8 Failure to pay the levy will result in suspension of Licence/Certificate until the levy has been paid, and any outstanding money owed can be recovered as a civil deb.
- 19.9 Exemptions from the Levy

The following permitted categories of premises are exempt from paying the levy

- a) Premises with overnight accommodation;
this exemption does not apply if alcohol is served during the late night supply period to members of the public who are not staying overnight,
- b) Theatres and cinemas;
this exemption only applies if alcohol is served during the late night supply period only for consumption on the premises to ticket holders, participants in the production, or invited guests to private events; they must be bona-fide theatres or cinemas and the sale of alcohol must not be their primary purpose,
- c) Bingo Halls;
these premises must have licenses under the Gambling Act 2005 and the playing of bingo must be the primary activity,
- d) Community Amateur Sports Clubs;

these must be clubs registered as Community Amateur Sports Clubs that are entitled to various tax concessions including relief from business rates,

- e) Community premises;
these must be premises that form part of the church hall, chapel hall, village hall, parish hall, community hall or other similar buildings,
- f) New Year's Eve Premises only,
this relates to premises which are authorised to sell alcohol between midnight and 6am, ONLY applies on New Year's Day.

19.10 No exemptions will be granted for the following:

- a) Country Village Pubs – this has been decided because it is not relevant to a London Borough such as Tower Hamlets as the definition is pubs that are solely designated in rural settlements with a population less than 3000.
- b) Business Improvement Districts (BIDs) - BIDs are district led partnerships created through ballots process via businesses within the district and operate via a levy charge. There are currently none within the borough.

19.11 Reductions

A 30% reduction of the levy will be given to premises who have achieved accreditation in Best Bar None (BBN) Scheme.

No reduction will be given to premises subject to small business rates relief. This has been decided because these premises receive business rates relief to assist in their viability; however, if they operate in the late night period there is no reason to suggest that they are less likely than similar businesses to contribute to the detrimental effects of the late night economy. Furthermore, due to their rateable value, they are more likely to be liable to the lower levy amounts.

19.12 Temporary Event Notices (TENs)

The levy does not apply to Temporary Event Notifications (TENs).

20 Cumulative Effect

- 20.1 The Licensing Authority will not take 'need' into account when considering an application (i.e. commercial demand), as this is not a licensing objective. However, it recognises that the cumulative impact of the number, type and density of licensed premises in a given area, may lead to serious problems of nuisance and disorder outside and some distance from the premises.
- 20.2 Representations may be received from a responsible authority / other persons that an area has become saturated with premises, which has made it a focal point for large groups of people to gather and circulate away from the licensed premises themselves, creating exceptional problems of disorder and nuisance over and above the impact from the individual premises.
- 20.3 In these circumstances, the Licensing Authority may consider that the imposition of conditions is unlikely to address these problems and may consider the adoption of a special policy of refusing new licences because the area is saturated with licensed premises and the granting of any more would undermine one or more of the licensing objectives.
- 20.4 The Licensing Authority will take the following steps when considering whether to adopt a special saturation policy:-
- identification of serious and chronic concern from a responsible authority or representatives of residents about nuisance and disorder,
 - where it can be demonstrated that disorder and nuisance is arising as a result of customers from licensed premises, identifying the area from which problems are arising and the boundaries of that area,
 - assessing the causes,
 - adopting a policy about future licence applications from that area.
- 20.5 The Licensing Authority will not adopt a "cumulative impact" policy in relation to a particular area without having consulted individuals and organisations listed in Section 5(3) of the Licensing Act (i.e. those who have to be consulted about this policy). It will also have ensured that there is consultation with local residents.
- 20.6 The Licensing Authority will consider representations based on the impact on the promotion of the licensing objectives in the Borough generally of the grant of the particular application in front of them.
- 20.7 However, the onus would be on the objectors to provide evidence to back up any assertion that the addition of the premises in question would produce the

cumulative impact claimed, taking into account that the impact will be different for premises with different styles and characteristics.

20.8 The Licensing Authority will review any special saturation policies every three years to see whether they have had the effect intended, and whether they are still required.

20.9 The Licensing Authority will not use such policies solely:-

- as the grounds for removing a licence when representations are received about problems with existing licensed premises, or,
- to refuse modifications to a licence, except where the modifications are directly relevant to the policy, for example where the application is for a significant increase in the capacity limits,
- to impose any form of quota.

20.10 The Licensing Authority recognises that there is a wide diversity of premises requiring a licence and will have full regard to the differing impact these will have on the local community.

20.11 It therefore also recognises that, within this policy, it may be able to approve licences that are unlikely to add significantly to the saturation and will consider the circumstances of each individual application.

21 Special Cumulative Impact Policy for the Brick Lane and Bethnal Green Area

21.1 The Licensing Authority's Special Cumulative Impact Policy for Brick Lane and Bethnal Green Areas can be found in appendix 5.

22 Sexual Entertainment

22.1 The Licensing Authority has a separate policy in relation to Sexual Entertainment Venues (SEVs), which can be found in Appendix 4.

23 Late Night Refreshments and Deregulation Act 2015

- 23.1 Paragraph 2A of Schedule 2 to the 2003 Act (as inserted by the Deregulation Act 2015) gives licensing authorities powers to exempt premises, in certain circumstances, from the requirement to have a licence to provide late night refreshment. Licensing authorities can choose to apply an exemption specifically where they think it will be helpful to businesses and where there are no problems with anti-social behaviour, disorder associated with the night time economy, or illegal working in licensed premises.
- 23.2 The Licensing Authority can only exempt types of premises set out in the regulations. These are:
- Motorway service areas;
 - petrol stations;
 - local authority premises (except domestic premises) unless there is an event taking place at which more than 500 people are present;
 - schools (except domestic premises) unless there is an event taking place at which more than 500 people are present;
 - hospitals (except domestic premises);
 - community premises (church, chapel, village, parish or community hall or other similar building) unless there is an event taking place at which more than 500 people are present;
 - licensed premises authorised to sell by retail alcohol for consumption on the premises between the hours of 23.00 and 05.00.
- 23.3 This Licensing Authority has decided it is not appropriate for the reasons of promotion of the licensing objectives to use the exemptions, and it requires all late night refreshment providers to be licensed.

24 Live Music, Dancing and Theatre

- 24.1 In its role of implementing local authority cultural strategies, the Licensing Authority recognises the desirability of encouraging and promoting live music, dance, theatre and festivals for the wider cultural benefit of the community, particularly for children. This broad strategy includes all forms of licensable live entertainment. The Licensing Authority recognises that a rich cultural provision has a positive role in community cohesion.
- 24.2 When considering applications for such events and the imposition of conditions on licences or certificates, the Licensing Authority will carefully balance these cultural needs with the necessity of promoting the licensing objectives.
- 24.3 Consideration will be given to the particular characteristics of any event, including the type, scale and duration of the proposed entertainment, especially where

limited disturbance only may be caused. The Licensing Authority will regulate live performances on a risk assessed basis and we will be mindful of the licensing objectives and the need to ensure we are not committing disproportionate costs to regulation.

24.4 The Live Music Act came into force on 1st October 2012 and is designed to encourage more performances of 'live' music. The Act:

- i. Removes the licensing requirement for unamplified live music taking place between 8am and 11pm in all venues. This is subject to the right of a licensing authority to impose conditions about live music following a review of a premises licence where the premises are authorised to supply alcohol for consumption on the premises.
- ii. Removes the licensing requirement for amplified live music taking place between 8am and 11pm before audiences of no more than 500 persons on premises authorised to supply alcohol for consumption on the premises. This is subject to the right of a licensing authority to impose conditions about live music following a review of a premises licence.
- iii. Removes the licensing requirement for amplified live music taking place between 8am and 11pm before audiences of no more than 500 persons in workplaces (but not necessarily for workers) not otherwise licensed under the 2003 Act (or licensed only for the provision of late night refreshment).
- iv. Removes the licensing requirement for the provision of entertainment facilities and widens the licensing exemption for live music integral to a performance of Morris dancing or dancing of a similar type, so that the exemption applies to live or recorded music instead of unamplified live music.

25 Risk Assessments

- 25.1 When the Licensing Authority's discretion is engaged it expects applicants to have regard to the advice of the Metropolitan Police in relation to the licensing objective of the prevention of crime and disorder. Therefore, it recommends for significant events (please see note below for definition), a comprehensive risk assessment is undertaken by premises licence holders to ensure that crime and disorder and public safety matters are identified and addressed. Completing of such a risk assessment should include checking previous venues where the artists / performers / promoters have performed recently to see if there have been any issues, and any social media sites to check for any potential problems such as a young audience. The risk assessment should consider the provision and numbers of SIA security, search, ejection policy and entry and egress plans. Such risk assessments should be written down, stored for a year, and made available to Responsible authorities upon request. Accordingly, for premises that wish to stage promotions, or events (as defined below) the Licensing Authority expects that applicants carry out the Risk Assessment and debrief processes and when relevant include in their Operating Schedule.
- 25.2 Licence Holders should discuss their Risk assessments with Metropolitan Police at least 14 days prior to the proposed event.
- 25.3 The additional event/promotion specific risk assessment is for where the venues have events/promotions with different artistes or DJs than their usual DJ/Artistes.
- 25.4 The Premises Licence Conditions proposed by can be recommended as part of a pool of model conditions in appendix 3. They will not be imposed on any licence as a condition, unless as suggested in the applicants operating schedules, or the licensing authority is engaged, i.e., where relevant representations for any application are received. If conditions are to be applied, they will have to be relevant and proportionate to the matters raised in representations.
- 25.5 Definition of a 'Significant Event':
A significant event will be deemed to be: any occasion in a premises licensed under the provisions of the Licensing Act 2003, where there will be a live performer(s) – meaning musicians, DJs, MCs or other artist; that is promoted in some form by either the venue or an outside promoter; where entry is either free, by invitation, pay on the door or by ticket.
- 25.6 Licensees are advised to consult the local Metropolitan Police Licensing Unit to clarify whether their proposed event is significant.

26 Temporary Event Notices Process

- 26.1 The Licensing Act 2003 allows small scale events which include any licensable activities to be held without the need for a premises licence. However advanced notice of at least ten full working days' notice must be given to the Licensing Authority and the Metropolitan Police (please see paragraph 23.4 and 23.5 below for this Licensing Authority's required notice period).
- 26.2 Temporary Event Notices (TENs) authorise "one-off" licensable activities on a premises without the need for a premises licence or club premises certificate. TENs are not a Licence but a notification to the Licensing Authority, Police and Environmental Health of the intention to carry out Licensable activities. There are certain restrictions relating to TENs set out in the Act:
- a) the number of times a person (the "premises user") may give a TEN:
 - 50 times per calendar year for a personal licence holder (inclusive of Late TENs subject to a maximum of 10),
 - 5 times per calendar year for other people (i.e., non personal licence holders) (inclusive of Late TENs subject to a maximum of 2);
 - b) the number of times a TEN may be given for individual premises is 15*times in a calendar year (this number took effect from 1st January 2016 as per the Deregulation Act 2015) so long as the total number of days used for these events does not exceed 21**;
 - c) the temporary event may last no more than 168 hours (this relates to the licensable activities only);
 - d) the scale of the event in terms of the maximum number of people attending at any one time can be no more than 499 (including staff/volunteers etc. running the event).

*The Alcohol Licensing (Coronavirus) (Regulatory Easements) (Amendment) Regulations 2021 has temporarily increased the limits detailed in b) above for 2022 to 2023 (calendar year). * increased to 20 days and ** increased to 26 days.*

- 26.3 Where events are planned outside the limits above, an application must be made for a limited duration Premises Licence.
- 26.4 The Secretary of State's Guidance states "Although ten clear working days is the minimum possible notice that may be given, licensing authorities should publicise their preferences in terms of advance notice and encourage premises users to

provide the earliest possible notice of events planned by them. Licensing authorities should also consider publicising a preferred maximum time in advance of an event by when TENs should ideally be given to them”

- 26.5 In accordance with this Guidance, this Licensing Authority expects event organisers’ to give at least 28 days’ notice of a temporary event. We also expect that events are discussed with Metropolitan Police and Environmental Health, Noise prior to submission. This will ensure that full detailed discussion can take place between the organiser and any other interested parties in order to ensure promotion of the 4 licencing objectives. The maximum timescale this Licensing Authority will accept a TEN in advance of an event is 3 months.
- 26.6 Risk Assessments: In order to assist the Metropolitan Police, we would strongly urge that Risk Assessments are either included with the TEN submission or sent to the Police via the details in Council’s Responsible Authority list on their website. Such risk assessments need to include a description of the event, any risks identified with the event such as increased possibility of intoxicated customers, underage attending the event, or perceived drug use, and any mitigating steps that have implemented to address the identified risks. Where promoted music events are taking place at the premises such a risk assessment should include checking previous venues where the artists / performers / promoters have performed recently to see if there have been any issues, and any social media sites to check for any potential problems such as a young audience. The risk assessment should also consider the provision and numbers of SIA security, search, ejection policy and entry and egress / dispersal plans.
- 26.7 TENs relating to outdoor events are strongly advised to contact the Council’s Sports Leisure and Culture Department, Environmental Health and Health and Safety as well as the emergency services for advice.
- 26.8 With regards to giving notice to the relevant authority, as the term “give” used in section 100 of Licensing Act 2003 is not defined, the Licensing Authority considers this to mean the date on which the TEN is received by the Licensing Authority and not the date on which it was sent. Applicants are therefore advised to hand deliver notices if time is short, as late notices will not be accepted under any circumstances.
- 26.9 Applications for TENs must be made using the prescribed form. Applications must be given to the Licensing Authority and the Metropolitan Police in duplicate.
- 26.10 It should be noted that the Metropolitan Police and the Council’s Environmental Health Notice Service are the only bodies who may make representations to a TEN. However, these two bodies may object to a TEN on grounds that any of the

licensing objectives would not be promoted should the event go ahead. Where objections are received the matter will be put before the Licensing Authority's Licensing Sub-Committee. The Licensing Sub-Committee may:

- i) Allow the TEN to go ahead
- ii) Reject the TEN

26.11 The Act does allow for Late TENS to be submitted by event organisers subject to the to the limitations in paragraph 23.2 (b-d) above and the below limitations referred to below in relation to the number of times a person (the "premises user") may give a Late TEN, which is:

- a) **10** times per calendar year for a personal licence holder,
- b) **2** times per calendar year for other people (non personal licence holders).

26.12 These "Late TENS" can be submitted to the Licensing Authority, Metropolitan Police and the Council's Environmental Health Noise Section between 5 and 9 days clear working days before the event, this does not include the day of receipt of the TEN or the day of the proposed event. It should be noted that if either the Police or the Council's Noise and Nuisance team lodges an objection to a Late TEN the event will not go ahead.

26.13 The Licensing authority, with other partners, will provide advice where appropriate to help organisers to plan their events safely, check that the limitations set down in the Act are being observed and that there are no limitations or restrictions under other legislation.

26.14 TENS received that relate to premises within the Cumulative Impact Zone may be received objections from the Police or Environmental Health on the grounds that the giving of a TEN would undermine the licensing objectives in the Cumulative Impact Zone (CIZ). Therefore, persons giving TENS within this Zone should have regard for the Cumulative Impact Policy detailed above and the Secretary State's Guidance relating to Cumulative Impact. The reason for the CIZ is to reduce crime and disorder, and nuisance from a concentration of licensed premises.

27 Enforcement

- 27.1 Once licensed, it is essential premises are maintained and operated so as to ensure the continued promotion of the licensing objectives and compliance with the specific requirements of the Act and the Licensing Authority will make arrangements to monitor premises and take appropriate enforcement action to ensure this.
- 27.2 The Licensing Authority will work closely with Borough Police to establish protocols to ensure an efficient deployment of Police and Council Officers engaged in enforcing licensing law and inspecting licensed premises, in order to ensure that resources are targeted at problem and high risk premises.
- 27.3 The Licensing Authority considers the protection of minors to be a particular priority for enforcement and will, in partnership with other agencies, especially the Police, seek to use the criminal sanctions of the Licensing Act to their fullest extent to achieve such protection.
- 27.4 In relation to enforcement the Council will abide by the Regulators Compliance Code and the Enforcement Concordat and the Council's Enforcement Policy. A copy of this policy is available on the Council's website. In most cases a graduated form of response will be used to resolve issues of non-compliance although it is recognised that in serious cases a prosecution or a review application are appropriate means of disposal. The Council will use test purchases as a legitimate way to determine compliance to the license conditions. Failed test purchases will be disposed with by reference to the Council Enforcement Policy.
- 27.5 Following this Policy the Licensing Authority can take the following action:
- a. Taking no action;
 - b. Issuing an informal warning;
 - c. Recommending improvements within a particular time;
 - d. Monitoring by regular inspection and invite to seek a further review if problems persist;
 - e. Investigate breaches of legislation and refer matters to the Council's Legal Department for consideration for prosecution.
- 27.6 Conditions (other than the statutory mandatory conditions) may only be attached to a licence or club premises certificate if relevant representations are received

(except for conditions drawn from the applicant's operating schedule since these are voluntary propositions). Any such conditions will be tailored to the individual style and characteristics of the premises and events concerned.

27.7 Conditions should be:

- Clear,
- Enforceable,
- Evidenced,
- Proportionate,
- Be expressed in plain language capable of being understood by those expected to comply with them.

27.8 Conditions must be attached at a hearing; unless the authority, the premises user, and the relevant responsible authority have agreed a hearing is unnecessary.

27.9 Licensing authority cannot impose blanket standard conditions. The Secretary of State's Guidance contains a A pool of conditions.

27.10 Conditions can only be carried forward from a premises licence or club premises certificate onto a TEN where relevant objections have been made by the Police or Environmental Health.

27.11 Non Payment of Licence Fee

In accordance with the amendments introduced by the Police Reform and Social Responsibility Act 2011, the council must suspend premises licences and club premises certificates on the non-payment of annual fees.

27.12 The legislation states that the premises licence holder will be given at least 2 working days' notice that the licence will be suspended before the suspension is to take effect.

27.13 It is the duty of the Licence Holder to pay their annual licence fee when it is due. The Licensing Authority will send a single request for payment to the licence holder giving 28 days from the date of the letter to make the required payment. If no payment is received the Licensing Authority will take measures to suspend the licence.

27.14 Following the action to suspend the licence income recovery procedures will be commenced along with enforcement visits to ensure that the suspension is maintained until payment is received or licence surrendered.

28 Review Process

- 28.1 Working in partnership:
The promotion of the licensing objectives and achieving common aims relies on a partnership between licence holders, authorised persons, other persons, (as defined by the Secretary of State Guidance), responsible authorities and the Licensing Authority. The licensing authority will try to give licence holders early warning of any concerns about problems identified at any licensed premises and identify the need for improvement.
- 28.2 Purpose of reviews:
The review process is integral to the operation of the Act. The Government's intention is a light touch regulatory regime with regard to the granting of new licences and variations. Only when there have been representations will the Licensing Authority have the discretion not to grant licences. If problems arise in connection with a premises licence, it is for the Responsible Authorities and the other persons to apply for a review of the licence. Without such representations, the Licensing Authority cannot review a licence.
- 28.3 Proceedings:
There are proceedings under the Act for reviewing a premises licence. These are provided as protection for the community, where problems associated with crime and disorder, public safety, public nuisance or the protection of children from harm are occurring.
- 28.4 Initiating Reviews:
At any stage, following the grant of a premises licence, any of the Responsible Authorities or any other persons, such as a resident living in the vicinity of the premises and Councillors, may ask the Licensing Authority to review the licence because of a matter arising at the premises in connection with any of the four licensing objectives.
- 28.5 The Police and Environmental Health Officers have various additional powers of - closure. The Licensing Authority cannot initiate its own reviews of premises licences, however, officers of the Council who are specified as Responsible Authorities under the Act may request reviews.
- 28.6 In every review case an evidential basis for the allegations made will need to be submitted to the Licensing Authority. When a request for a review is initiated from an other person, the Licensing Authority is required to first consider whether the representation made is irrelevant to the licensing objectives, or is vexatious or frivolous.
- 28.7 Where the Licensing Authority receives a request for a review in accordance with the closure procedures described in Part 8 of the Act (for example, closure orders), it will arrange a hearing in accordance with the regulations set out by the

Government.

- 28.8 Powers following determination of review - The Licensing Authority in determining a review may exercise the range of powers given to them to promote the licensing objectives. Where the licensing authority considers that action under its statutory powers is appropriate, it may take any of the following steps:
- a. Modify the conditions of the premises licence (which includes adding new conditions or any alteration or omission of an existing condition);
 - b. Exclude a licensable activity from the scope of the licence;
 - c. Remove the designated supervisor;
 - d. Suspend the licence for a period not exceeding three months;
 - e. Revoke the licence.

28.9 Where reviews arise and the Licensing Authority determines that the crime prevention objective is being undermined through the premises being used to further crimes, the revocation of the licence will be seriously considered. However, revocation also remains an option if other licensing objectives are being undermined.

29 Responsibility of Licence Holders and Designated Premises Supervisors (DPS)

- 29.1 When licence holders or designated premises supervisors move, leave a premises or dispose of their premises they remain responsible in law until they have informed the licensing authority and surrendered the licence or arranged a transfer, which may involve notification to the Police as well. Any licensees or designated premises supervisors who are not sure what to do should contact the licensing authority. Please note that should the DPS cease to work/be employed by the premises the Licensing Authority will consider that there is no DPS for those premises. This consideration shall apply regardless of whether that person is still named on the Premises Licence, or whether they have asked for their name to be removed from it. This consideration shall apply until such time that an application is received to nominate a new premises supervisor. In such cases, the Licensing Authority shall expect no sales of alcohol to take place until an application to vary the DPS has been submitted to the Licensing Authority.
- 29.2 Every premises licence that authorises the sale of alcohol must specify a designated premises supervisor (DPS). This will normally be the person who has

been given day to day responsibility for running the premises by the premises licence holder. The only exception is for community premises which have successfully made an application to remove the usual mandatory conditions set out in the 2003 Act. The DPS to be a person with day to day managerial control of the premises who will take reasonable steps to ensure the licensing objectives are promoted and licence conditions are adhered to.

- 29.3 Though there is no requirement for a designated premises supervisor (DPS) to be on the premises at all times that alcohol is being sold, the Licensing Authority expects where they are likely to be absent for a prolonged period, perhaps due to ill health, maternity leave or extended holiday, that a new DPS to be appointed to cover the period of absence. If there are concerns that a DPS is repeatedly absent, the Police may apply for a review of the Premises Licence if this gives rise to concerns about the operation of the premises and its impact on the licensing objectives.
- 29.4 Where the DPS is not present at the premises the Licensing Authority, following guidance by the Secretary of State, recommends that personal licence holders give specific written authorisations to individuals that they are authorising to retail alcohol. The letter of authorisation should state the following:-
- the person(s) authorised to sell alcohol at any particular premises should be clearly identified;
 - the authorisation should have specified the acts which may be carried out by the person who is authorised to supply alcohol;
 - there should be an overt act of authorisation, for example, a specific written statement given to the individual who is authorised to supply alcohol; and
 - there should be in place sensible arrangements for the personal licence holder to monitor the activity that they have authorised on a reasonably regular basis.

It should be noted that the responsibility remains with the Premises Licence Holder and the Designated Premises Supervisor.

- 29.5 The Coronavirus pandemic has demonstrated the need for good contact details, particularly digital ones with Licence Holders. Throughout the pandemic and this Licensing Authority held online meetings with licence holders and continued to

keep them up to date with guidance on restrictions as they came in from Central Government. Through this we found that many of the contact details we had for our Licence holders, particularly email addresses were either incorrect or were those of the Solicitors who dealt with the original application at the time. This has also caused issue for licence holders when we notify them of their annual fee with letters sometime going to solicitors' firms rather than the licence holder.

In light of this we expect applicants to include the correct correspondence address for the proposed licence holder in their application, and where possible include an email address for the Licence Holder. We also expect Licence holders to keep this Licensing Authority up to date should the contacts for the Licence holder either address, telephone number or email address change.

This will ensure that if needed the Licensing Authority can contact the Licence Holder promptly, we can and will help to avoid unnecessary suspensions of licences because the reminder letter was not received by the Licence Holder.

30 Duplication

- 30.1 As far as possible the Licensing Authority will seek to avoid duplication with other regulatory regimes. The Licensing Authority will however impose tailored conditions where it judges it necessary to meet the licensing objectives.

31 Administration, Exercise and Delegation of Functions

- 30.2 The Licensing Authority will be involved in a wide range of licensing decisions and functions and has established a Licensing Committee to administer them.
- 30.3 Appreciating the need to provide a speedy, efficient and cost-effective service to all parties involved in the licensing process, the Committee has delegated certain decisions and functions and has established a number of Sub-Committees to deal with them.
- 30.4 The following Table sets out the agreed delegation of decisions and functions to Licensing Committee / Sub-Committees and Officers.

Matter to be dealt with	Full	Sub	Officers
Application for personal licence		Police objection including unspent	If no objection made
Application for premises licence/club premises certificate		If a relevant representation made	If no relevant representati

Application for provisional statement		If a relevant representation made	If no relevant representati
Application to vary premises licence/club premises certificate		If a relevant representation made	If no relevant representati
Application to vary designated premises supervisor		If police objection	All other cases
Request to be removed as designated premises supervisor			All cases
Application for transfer of premises licence		If police objection	All other cases
Application for interim authorities		If police	All other
Application to review premises licence / club premises certificate		All cases	
Decision on whether a complaint is irrelevant, frivolous, vexatious etc;			All cases
Decision to object when local authority is consultee and not the relevant authority considering the application		All cases	
Determination of a police objection to a temporary event notice		All cases	
Decision on whether a minor variation application is valid, the need to go out to consultation and determination.			All cases
Determination of minor variation application			All cases

Determination of application to vary premises licence at community premises to include alternative licence condition		If a police objection	All cases
Power to suspend a premises licence (S.55A (1) LA2003) or club premises certificate (S.92A (1) LA2003) for non			All cases
Power to specify the date on which suspension takes effect. This must be at least 2 working days after the day the			All cases
Power to impose existing conditions on a premises licence, club premises certificate and Temporary Event Notice where all parties agree that a Hearing is unnecessary – see S.106A LA2003.			All cases
Power to make representations as responsible authority			All cases

- 30.5 Further, with many of the decisions and functions being purely administrative in nature, the grant of non-contentious applications, including for example, those licences and certificates where no representations have been made, has been delegated to Council Officers.
- 30.6 This form of delegations is without prejudice to Officers referring an application to a Sub-Committee, or a Sub-Committee to Full Committee, if considered appropriate in the circumstances of any particular case.

- 30.7 The officers to exercise the discretion are officers who are responsible for the Licensing function and who are given the appropriate written delegated authority.
- 30.8 Application forms, fees, and details regarding each type of application, including the minor variations process can be obtained from the Councils website or by contacting the Licensing and Safety Team on 0207 364 5008 or Licensing@towerhamlets.gov.uk.
- 30.9 The Licensing Authority encourages informal discussion before the application process in order to resolve potential problems and avoid unnecessary hearings and appeals.

Appendix 1:

List of Responsible Authorities

There are a number of “Responsible Authorities”. These have been designated by the Government. Any variation application should be discussed with the relevant authorities first. All new (including time limited) and variation applications have to be sent to the responsible authority. If you are not sure you will need to check which organisation is responsible for health and safety before you send off your forms.

For a full list of Responsible Authorities please see the link below, which is updated regularly:

https://www.towerhamlets.gov.uk/ignl/business/licences/beer_and_entertainment/Responsible-Authorities.aspx

Appendix 2

Mandatory Conditions Made under the Licensing Act 2003 and associated Orders

No supply of alcohol may be made under the premises licence-

- a) at a time where there is no designated premises supervisor in respect of the premises licence, or
- b) at a time when the designated premises supervisor does not hold a personal licence or his personal licence is suspended

For “ON and OFF SALES” and “ON SALES ONLY”: Add conds 1-5

1.
 - (1) The responsible person must ensure that staff on relevant premises do not carry out, arrange or participate in any irresponsible promotions in relation to the premises
 - (2) In this paragraph, an irresponsible promotion means any one or more of the following activities, or substantially similar activities, carried on for the purpose of encouraging the sale or supply of alcohol for consumption on the premises;
 - (a) games or other activities which require or encourage, or are designed to require or encourage, individuals to—
 - (i) drink a quantity of alcohol within a time limit (other than to drink alcohol sold or supplied on the premises before the cessation of the period in which the responsible person is authorised to sell or supply alcohol), or
 - (ii) drink as much alcohol as possible (whether within a time limit or otherwise);
 - (b) provision of unlimited or unspecified quantities of alcohol free or for a fixed or discounted fee to the public or to a group defined by a particular characteristic in a manner which carries a significant risk of undermining a licensing objective
 - (c) provision of free or discounted alcohol or any other thing as a prize to encourage or reward the purchase and consumption of alcohol over a period of 24 hours or less in a manner which carries a significant risk of undermining a licensing objective;
 - (d) selling or supplying alcohol in association with promotional posters or flyers on, or in the vicinity of, the premises which can reasonably be considered to condone, encourage or glamorise anti-social behaviour or to refer to the effects of drunkenness in any favourable manner;

- (e) dispensing alcohol directly by one person into the mouth of another (other than where that other person is unable to drink without assistance by reason of disability)
2. The responsible person must ensure that free potable water is provided on request to customers where it is reasonably available.
3.
 - (1) The premises licence holder or club premises certificate holder must ensure that an age verification policy is adopted in respect of the premises in relation to the sale or supply of alcohol.
 - (2) The designated premises supervisor in relation to the premises licence must ensure that the supply of alcohol at the premises is carried on in accordance with the age verification policy
 - (3) The policy must require individuals who appear to the responsible person to be under 18 years of age (or such older age as may be specified in the policy) to produce on request, before being served alcohol, identification bearing their photograph, date of birth and either—
 - (a) a holographic mark, or
 - (b) an ultraviolet feature.
4. The responsible person must ensure that —
 - (a) where any of the following alcoholic drinks is sold or supplied for consumption on the premises (other than alcoholic drinks sold or supplied having been made up in advance ready for sale or supply in a securely closed container) it is available to customers in the following measures —
 - (i) beer or cider: ½ pint
 - (ii) gin, rum, vodka or whisky: 25 ml or 35 ml; and
 - (iii) still wine in a glass: 125 ml;
 - (b) these measures are displayed in a menu, price list or other printed material which is available to customers on the premises; and
 - (c) where a customer does not in relation to a sale of alcohol specify the quantity of alcohol to be sold, the customer is made aware that these measures are available.
5.
 1. A relevant person shall ensure that no alcohol is sold or supplied for consumption on or off the premises for a price which is less than the permitted price.
 2. For the purposes of the condition set out in paragraph 1—
 - (a) “duty” is to be construed in accordance with the Alcoholic Liquor Duties Act 1979;

- (b) “permitted price” is the price found by applying the formula —

$$P = D + (D \times V)$$

where —

- (i) **P** is the permitted price
 - (ii) **D** is the amount of duty chargeable in relation to the alcohol as if the duty were charged on the date of the sale or supply of the alcohol, and
 - (iii) **V** is the rate of value added tax chargeable in relation to the alcohol as if the value added tax were charged on the date of the sale or supply of the alcohol;
- (c) “relevant person” means, in relation to premises in respect of which there is in force a premises licence
- (i) the holder of the premises licence
 - (ii) the designated premises supervisor (if any) in respect of such a licence, or
 - (iii) the personal licence holder who makes or authorises a supply of alcohol under such a licence
- (d) “relevant person” means, in relation to premises in respect of which there is in force a club premises certificate, any member or officer of the club present on the premises in a capacity which enables the member or officer to prevent the supply in question; and
- (e) “value added tax” means value added tax charged in accordance with the Value Added Tax Act 1994

3. Where the permitted price given by Paragraph (b) of paragraph 2 would (apart from this paragraph) not be a whole number of pennies, the price given by that sub-paragraph shall be taken to be the price actually given by that sub-paragraph rounded up to the nearest penny.

4. (1) Sub-paragraph (2) applies where the permitted price given by Paragraph (b) of paragraph 2 on a day (“the first day”) would be different from the permitted price on the next day (“the second day”) as a result of a change to the rate of duty or value added tax.

(2) The permitted price which would apply on the first day applies to sales or supplies of alcohol which take place before the expiry of the period of 14 days beginning on the second day

For “OFF SALES ONLY” Add the following conditions

- (1) The premises licence holder or club premises certificate holder must ensure that an age verification policy is adopted in respect of the premises in relation to the sale or supply of alcohol.
 - (2) The designated premises supervisor in relation to the premises licence must ensure that the supply of alcohol at the premises is carried on in accordance with the age verification policy
 - (3) The policy must require individuals who appear to the responsible person to be under 18 years of age (or such older age as may be specified in the policy) to produce on request, before being served alcohol, identification bearing their photograph, date of birth and either—
 - (a) a holographic mark, or
 - (b) an ultraviolet feature.
5. 1. A relevant person shall ensure that no alcohol is sold or supplied for consumption on or off the premises for a price which is less than the permitted price.
2. For the purposes of the condition set out in paragraph 1—
- (a) “duty” is to be construed in accordance with the Alcoholic Liquor Duties Act 1979;
 - (b) “permitted price” is the price found by applying the formula —

$$P = D + (D \times V)$$

Where —

- (i) **P** is the permitted price
 - (ii) **D** is the amount of duty chargeable in relation to the alcohol as if the duty were charged on the date of the sale or supply of the alcohol, and
 - (iii) **V** is the rate of value added tax chargeable in relation to the alcohol as if the value added tax were charged on the date of the sale or supply of the alcohol;
- (c) “relevant person” means, in relation to premises in respect of which there is in force a premises licence
- (i) the holder of the premises licence
 - (ii) the designated premises supervisor (if any) in respect of such a licence, or
 - (iii) the personal licence holder who makes or authorises a supply of alcohol under such a licence

- (d) “relevant person” means, in relation to premises in respect of which there is in force a club premises certificate, any member or officer of the club present on the premises in a capacity which enables the member prevent the supply in question; and
- (e) “value added tax” means value added tax charged in accordance with the Value Added Tax Act 1994

3. Where the permitted price given by Paragraph (b) of paragraph 2 would (apart from this paragraph) not be a whole number of pennies, the price given by that sub-paragraph shall be taken to be the price actually given by that sub-paragraph rounded up to the nearest penny.

4. (1) Sub-paragraph (2) applies where the permitted price given by Paragraph (b) of paragraph 2 on a day (“the first day”) would be different from the permitted price on the next day (“the second day”) as a result of a change to the rate of duty or value added tax.

(2) The permitted price which would apply on the first day applies to sales or supplies of alcohol which take place before the expiry of the period of 14 days beginning on the second day.

Appendix 3

Model Conditions

The below are a list of model conditions, which are intended to be used by Applicants, Responsible Authorities, or Other Persons making a representation. Where necessary these conditions should be modified in order to be appropriate, proportionate, and enforceable in respect to the type of application.

This appendix does not form part of the Statement of Licensing Policy to allow for it to be modified where appropriate to ensure conditions contain fit any new or emerging trends.

This basket of model conditions is not an exclusive or exhaustive list of conditions which may be included on a premises licence. It does not restrict any applicant, responsible authority, or interested party from proposing any alternative conditions, nor would it restrict a licensing sub-committee from imposing any reasonable condition on a licence it considers necessary for the promotion of the licensing objectives.

Conditions are listed under the Licensing Objective that they most appropriately promote.

Key:

The second column in the table that follows indicates the types of premises to which the condition in the third column might be of most relevance.

- A** Restaurants
- B** Public houses, wine bars or other drinking establishments
- C** Café-bars
- D** Hotel bars
- E** Night-clubs
- F** Off-licences (including convenience stores)
- G** Pavement licences
- H** Qualifying clubs
- I** Take-aways
- J** Boats
- H** Other entertainment venues

Number	Suggested Applicable Premises	Condition
Prevention of crime and disorder		
1	A, B	<p>Touting:</p> <ol style="list-style-type: none"> 1. No person shall be employed to solicit for custom or be permitted to solicit for custom for business for the premises in any public place within a 500 meters radius of the premises as shown edged red on the attached plan. (marked as Appendix -) 2. Clear Signage to be placed in the restaurant windows stating that the premises supports the Council's 'No Touting' policy.
2.	J	<p>Boats:</p> <ol style="list-style-type: none"> 1. For all externally promoted events including DJs, birthday bookings (where the person whose birthday it is aged 25 or under), all football related bookings and for publicly ticketed events, all drinking vessels used in the venue shall be polycarbonate. All drinks in glass bottles are to be decanted into polycarbonate containers or polycarbonate carafes prior to being served, with the exception of champagne or bottles of spirits with a minimum size of 70cl supplied by waiter/waitress service to tables. Staff shall clear all empty champagne and spirit bottles promptly from the tables. Customers shall not be permitted to leave their table carrying any such glass bottles or drink directly from the bottle. 2. The bar shall close 15 minutes prior to disembarkation, after this no alcohol shall be sold. This is to be announced on the public address system. 3. Passengers shall not be allowed to bring alcohol on board the vessel.

		<ol style="list-style-type: none"> 4. The crew shall make a comprehensive safety announcement over the PA system before every departure. This is to include a segment on drink aware and the ejection policy. 5. Any passenger that becomes abusive/aggressive to the crew or other passengers shall be asked to leave the vessel. Such persons will be ejected at the nearest available pier. A duty of care shall be provided for the ejected persons and to consider calling the emergency services. 6. Passenger numbers for each trip should be recorded on the Ships AIS system and on-board in the Ships Diary. The capacity of the vessel shall be determined and approved by the Maritime and Coastguard Agency (MCA) and placed on the ships certificate. 7. All SIA approved staff engaged in supervising or controlling queues as well as engaged in duties on board the vessel shall wear high visibility yellow jackets or vests. 8. Registered SIA security staff to be on duty during all externally promoted events including DJs, birthday bookings where the person's birthday is between the ages of 16 and 25 and all football-related bookings. "However, this condition shall not apply to externally promoted events which involve events where there is no sale or supply of alcohol and those participating are young persons taking part in a school organised event supervised by teachers or support staff from the school." 9. The licence holder shall ensure that there is a written risk assessment policy in place for every event to be held on the vessel and be available for inspection by police or authorised officers 10. The SIA staff and crew will ensure that the pier is clear of all customers prior to leaving the pier. This includes a duty of care on all persons ejected during the duration of the trip.
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		<p>11. It shall be a condition of entry that the customer agrees to an outer clothing and bag search being carried out or refusal of entry will be given, and notices to that effect shall be displayed. SIA Door Supervisors on duty will action as to when and whom is searched and a record of any decisions to be made. All searching shall be supplemented by the use of metal detector wands.</p> <p>12. The crew shall patrol all parts of the vessel at regular intervals to check for unruly or unsafe behaviour.</p>
3.	A-H	<p>Smuggled Goods:</p> <ol style="list-style-type: none"> 1. The premises licence holder and any other persons responsible for the purchase of stock shall not purchase any goods from door-to-door sellers other than from established traders who provide full receipts at the time of delivery to provide traceability. 2. The premises licence holder shall ensure that all receipts for goods bought include the following details: <ol style="list-style-type: none"> i. Seller's name and address ii. Seller's company details, if applicable iii. Seller's VAT details, if applicable iv. Vehicle registration detail, if applicable 3. Legible copies of the documents referred to in 2) shall be retained on the premises and made available to officers on request. 4. The trader shall obtain and use a UV detection device to verify that duty stamps are valid. 5. Where the trader becomes aware that any alcohol may be not duty paid they shall inform the Police of this immediately.
4.	A, B, C, D, G	<p><u>Olympic Park – Football Ground/Special Events:</u></p> <ol style="list-style-type: none"> 1. On Match Days for premises licensed for the supply of alcohol for consumption on the premises:

		<ol style="list-style-type: none"> 1) Drinks shall only be supplied in polypropylene or similar plastic and all bottled drinks shall be poured into such drinking vessels before being handed to the customer. These should be made of recyclable materials. 2) Registered door staff shall be employed to control the entry and exits to the premises and to manage any licensed outside area(s). <p>2. No drinks shall be served in glass containers at any time during/whilst* [insert special event] *delete as appropriate</p>
5.	A-H	<p>CCTV/Incident Recording/Reporting</p> <ol style="list-style-type: none"> 1. The premises shall install and maintain a comprehensive CCTV system as per the minimum requirements of the Tower Hamlets Police Licensing Team. All entry and exit points will be covered enabling frontal identification of every person entering in any light condition. The CCTV system shall continually record whilst the premises is open for licensable activities and during all times when customers remain on the premises. All recordings shall be stored for a minimum period of 31 days with date and time stamping. Viewing of recordings shall be made available immediately upon the request of Police or authorised officer throughout the entire 31-day period. 2. The CCTV system serving the premises shall: <ol style="list-style-type: none"> a) be maintained fully operational and in good working order at all times; b) make and retain clear images that include the points of sale of alcohol and facial images of the purchasers of the alcohol; and c) show an accurate date and time that the images were made.

		<ol style="list-style-type: none"> 3. A staff member from the premises who is conversant with the operation of the CCTV system shall be on the premises at all times when the premises are open. This staff member must be able to provide a Police or authorised council officer copies of recent CCTV images or data with the absolute minimum of delay when requested. 4. No alcohol shall be sold if the CCTV equipment is inoperative for any reason. 5. An incident log shall be kept at the premises and be available on request to the Police or an authorised officer. It must be completed within 24 hours of any incident and will record the following: <ol style="list-style-type: none"> a) all crimes reported to the venue; b) all ejections of patrons; c) any complaints received concerning crime and disorder d) any incidents of disorder; e) all seizures of drugs or offensive weapons; f) any faults in the CCTV system, searching equipment or scanning equipment; g) any refusal of the sale of alcohol; h) any visit by a relevant authority or emergency service. 6. In the event that a serious assault is committed on the premises (or appears to have been committed) the management will immediately ensure that: <ol style="list-style-type: none"> a) the police (and, where appropriate, the London Ambulance Service) are called without delay; b) all measures that are reasonably practicable are taken to apprehend any suspects pending the arrival of the police; c) the crime scene is preserved so as to enable a full forensic investigation to be carried out by the police; and d) such other measures are taken (as appropriate) to fully protect the safety of all persons present on the premises.
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6.	A-H	<p><u>Personal Licence Holder/DPS</u></p> <ol style="list-style-type: none"> 1. There shall be a personal licence holder on duty on the premises at all times when the premises are authorised to sell alcohol. 2. When the designated premise supervisor is not on the premises any or all persons authorised to sell alcohol will be authorised by the designated premises supervisor in writing. This shall be available on request by the Police or any authorised officer.
7.	B, C, H, E, H	<p><u>Security/Searching</u></p> <ol style="list-style-type: none"> 1. A minimum of [insert appropriate number] SIA licensed door supervisors shall be on duty at the premises at all times whilst it is open for business 2. On any occasion that regulated entertainment is provided, not less than [insert appropriate number] SIA registered door supervisors will be engaged to control entry 3. At least [insert appropriate number] SIA licensed door supervisors shall be on duty at the entrance of the premises at all times whilst it is open for business. 4. At least [insert appropriate number] female door supervisor(s) shall be engaged at the premises at such times as door supervisors are required to be provided. 5. Where SIA registered door supervisors are used at the premises, a record must be kept of their SIA registration number and the dates and times they are on duty. 6. When the premises is carrying on licensable activities after [insert appropriate time (24HR format)] hours, at least [insert appropriate number] door supervisor(s) will be on duty at each door used for entry or exit.

	<p>7. No patrons shall be admitted or re-admitted to the premises after <i>[insert appropriate time (24HR format)]</i> unless they have passed through a metal detecting search arch and, if the search arch is activated or at the discretion of staff, then physically searched, which will include a 'pat down search' and a full bag search.</p> <p>8. All persons entering or re-entering the premises shall be searched by a SIA licensed member of staff and monitored by the premises CCTV system.</p> <p>9. A written search policy that aims to prevent customers or staff bringing illegal drugs, weapon or other illegal items onto the premises at any time shall be in place and operate at the premises.</p> <p>10. A clearly visible notice shall be placed at each entrance to the Premises advising those attending that it is a condition of entry that customers agree to being searched and that the police will be informed if anyone is found in possession of controlled substances or weapons. (E)</p> <p>11. All staff engaged outside the entrance to the premises, or supervising or controlling queues, shall wear high visibility jackets or vests. (B, E, J)</p> <p>12. There must be at the premises a lockable drugs box to which no member of staff, save the DPS and /or <i>[insert other responsible person, e.g. Premises Licence Holder, Manager, etc., as appropriate]</i>, shall have access. All controlled drugs (or items suspected to be controlled drugs or contain controlled drugs) found at the premises must be placed in this box as soon as practicable. Whenever this box is emptied, all of its contents must be given to the Police for appropriate disposal.</p>
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8.	E, H	<p><u>External Promoters:</u></p> <ol style="list-style-type: none"> 1. The premises licence holder must submit to the relevant police officer on request a completed risk assessment form as prescribed at least 14 days before any event that is promoted/advertised to the public at any time before the event and features DJ's, MC's or equivalent performing to recorded music.
9.	F	<p><u>Alcohol limits:</u></p> <ol style="list-style-type: none"> 1. No super-strength beer, lagers, ciders or spirit mixtures of 5.5% ABV (alcohol by volume) or above shall be sold at the premises, except for premium beers and ciders supplied in glass bottles. 2. No single cans or bottles of beer or cider or spirit mixtures shall be sold at the premises. 3. All sales of alcohol for consumption off the premises shall be in sealed containers only and shall not be consumed on the premises.
Public Safety		
10.	A, B, C, D, E, G, J, H	<p><u>Restrictions on use of glass container:</u></p> <ol style="list-style-type: none"> 1. No drinks shall be served in glass containers at any time. 2. All drinking vessels used in the venue shall be polycarbonate. All drinks in glass bottles are to be decanted into polycarbonate containers or polycarbonate carafes prior to being served, with the exception of champagne or bottles of spirits with a minimum size of 70cl supplied by waiter/waitress service to tables. Staff shall clear all empty champagne and spirit bottles promptly from the tables. Customers shall not be permitted to leave their table carrying any such glass bottles or drink directly from the bottle.

		<p>3. Notwithstanding 2 above, with the written agreement of the Tower Hamlets Licensing Police, a copy of which will be held at the premises reception, glass drinking vessels may be used for private or pre-booked events within the (specified area).</p> <p>4. Patrons permitted to temporarily leave and then re-enter the premises, e.g., to smoke, shall not be permitted to take drinks or glass containers with them.</p>
11.	B, E, I & J	<p><u>Capacity</u></p> <p>1. The number of persons permitted in the premises at any one time (including staff) shall not exceed <i>[insert appropriate number]</i> persons[, and such number shall be prominently displayed by each entrance to the premises]*delete as appropriate. <i>[The premises licence holder shall ensure a suitable method of calculating the number of people present during licensable activities is in place]</i> *delete as appropriate.</p>
12.	Unique to Beauty Premises	<p><u>Hairdresser/Barber/Salons:</u></p> <p>1. The sale of alcohol shall only be for consumption by customers, their bona fide guests. For the avoidance of doubt there shall be no sales of alcohol to staff for consumption on the premises.</p>

Prevention of public nuisance		
13.	A, B, C, D, E, J, H	<p><u>Noise prevention</u></p> <ol style="list-style-type: none"> 1. A noise limiter must be fitted to the musical amplification system set at a level determined by and to the satisfaction of an authorised officer of the Environmental Health Service, so as to ensure that no noise nuisance is caused to local residents or businesses. The operational panel of the noise limiter shall then be secured by key or password to the satisfaction of officers from the Environmental Health Service and access shall only be by persons authorised by the Premises Licence holder. The limiter shall not be altered without prior agreement with the Environmental Health Service. No alteration or modification to any existing sound system(s) should be effected without prior knowledge of an authorised Officer of the Environmental Health Service. No additional sound generating equipment shall be used on the premises without being routed through the sound limiter device. 2. Loudspeakers shall not be located in the entrance lobby or outside the premises building. 3. All windows and external doors shall be kept closed after <i>[insert appropriate time (24HR format)]</i> hours, or at any time when regulated entertainment takes place, except for the immediate access and egress of persons. 4. There shall be no admittance or re-admittance to the premises after <i>[insert appropriate time (24HR format)]</i> except for patrons permitted to temporarily leave the premises to smoke. 5. There shall be no sales of alcohol for consumption off the premises after <i>[insert appropriate time (24HR format)]</i>.

		<p>6. The licence holder shall enter into an agreement with a hackney carriage and/or private carriage firm to provide transport for customers, with contact numbers made readily available to customers who will be encouraged to use such services.</p> <p>7. Notices shall be prominently displayed at all exits requesting patrons to respect the needs of local residents and businesses and leave the area quietly.</p> <p>8. Notices shall be prominently displayed at any area used for smoking requesting patrons to respect the needs of local residents and use the area quietly.</p> <p>9. A direct telephone number for the manager at the premises shall be publicly available at all times the premises is open. This telephone number is to be made available to residents and businesses in the vicinity.</p> <p>10. The licence holder shall ensure that any queue to enter the premises which forms outside the premises is orderly and supervised by door staff so as to ensure that there is no public nuisance or obstruction to the public highway.</p> <p>11. Patrons permitted to temporarily leave and then re-enter the premises to smoke shall be restricted to a designated smoking area defined as [insert specific location].</p> <p>12. The sale and supply of alcohol for consumption off the premises shall be restricted to alcohol consumed at the outside tables and chairs shown on the licence plan, shall be by waiter or waitress service, served only to a person seated taking a table meal there and for consumption by such a person as ancillary to their meal.</p>
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		<p>13. The sale and supply of alcohol for consumption off the premises shall be restricted to alcohol consumed by persons who are seated in an area appropriately authorised for the use of tables and chairs on the highway and bona fide taking a table meal there, and where the consumption of alcohol by such persons is ancillary to taking such a meal, and where the supply of alcohol is by waiter or waitress service only.</p> <p>14. A written dispersal policy shall be in place and implemented at the premises to move customers from the premises and the immediate vicinity in such a way as to cause minimum disturbance or nuisance to neighbours.</p>
14.	A, B, C, D, E, G, J, H	<p><u>Outdoor areas</u></p> <ol style="list-style-type: none"> 1. The premises licence holder shall ensure that any patrons drinking and/or smoking outside the premises do so in an orderly manner and are supervised by staff so as to ensure that there is no public nuisance or obstruction of the public highway. 2. No more than [insert appropriate number] customers will be permitted to enter or remain in [insert specific location] the outdoor areas of the premises at any one time after the hours of [insert appropriate time (24HR format)]. 3. The outdoor area shall not be used by patrons after [insert appropriate time (24HR format)]. 4. All outside tables and chairs shall be rendered unusable by [insert appropriate time (24HR format)] each day. 5. All tables and chairs shall be removed from the outside area by [insert appropriate time (24HR format)] each day. 6. Alcohol consumed outside the premises building shall only be consumed by patrons seated at tables.

		<p>7. Patrons permitted to temporarily leave and then re-enter the premises, e.g., to smoke, shall be limited to [insert appropriate number] persons at any one time.</p>
15.	A, B, C, D, E, G, I, J, H	<p><u>Waste disposal/collections</u></p> <ol style="list-style-type: none"> 1. No waste or recyclable materials, including bottles, shall be moved, removed from or placed in outside areas between [insert appropriate time (24HR format)] hours and [insert appropriate time (24HR format)] hours on the following day. 2. No collections of waste or recycling materials (including bottles) from the premises shall take place between [insert appropriate time (24HR format)] and [insert appropriate time (24HR format)] on the following day.
17.	A-H	<p><u>Litter prevention</u></p> <ol style="list-style-type: none"> 1. All sealed containers of alcoholic drinks offered for sale for consumption off the premises must be clearly labelled or marked with the name and postcode of the premises. 2. No advertisements of any kind (including placard, poster, sticker, flyer, picture, letter, sign or other mark) that advertises or promotes the establishment, its premises, or any of its events, facilities, goods or services shall be inscribed or affixed upon the surface of the highway, or upon any building, structure, works, street furniture, tree, or any other property, or be distributed to the public. 3. During the hours of operation of the premises, the licence holder shall ensure sufficient measures are in place to remove and prevent litter or waste arising or accumulating from customers in the area immediately outside the premises, and that this area shall be swept and or washed, and litter and sweepings collected and stored in accordance with the approved refuse storage arrangements by close of business.

		4. Where the premises provide late night refreshment for consumption off the premises sufficient waste bins must be provided at or near the exits.
18.	J	<p><u>Boats:</u></p> <ol style="list-style-type: none"> 1. Amplified music or regulated entertainment shall not take place whilst the vessel is moored at its [insert address] moorings. 2. No noise shall emanate from the vessel which gives rise to a nuisance. 3. Alcohol shall not be taken or consumed off the vessel at any time. 4. The bar shall close 15 minutes prior to disembarkation, after this no alcohol shall be sold. This is to be announced on the public address system. 5. Passengers shall be advised by the crew to leave the vessel in a quiet and orderly fashion and not to do anything which is liable to disturb nearby residents. Prominent notices shall be displayed at the entrance and exit points. 6. All SIA approved staff engaged in supervising or controlling queues as well as engaged in duties on board the vessel shall wear high visibility yellow jackets or vests. 7. Crew members shall be positioned by the door to help guests disembark and ensure that overcrowding does not become a problem 8. While the vessel is at the pier music levels will be controlled to ensure no noise shall emanate nor vibration transmitted which gives rise to a Public Nuisance. 9. Flashing or particularly bright lights on or outside the premises shall not cause a nuisance to nearby properties (save insofar as they are necessary for the safety of the crew and customers, and for the prevention of crime).

		<p>10. Live or recorded music will not be allowed to commence until the vessel has left any embarkation pier and will cease before the vessel arrives at any disembarkation pier.</p>
Protection of Children from harm		
19.	A-H	<p><u>Challenge 25:</u></p> <ol style="list-style-type: none"> 1. All tills shall automatically prompt staff to ask for age verification identification when presented with an alcohol sale. 2. A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram. 3. A record shall be kept detailing all refused sales of alcohol. The record should include the date and time of the refused sale and the name of the member of staff who refused the sale. The record shall be available for inspection at the premises by the police or an authorised officer at all times whilst the premises is open. 4. All staff whose duties include the serving of alcohol must be trained in the requirements of this scheme including the importance of recording any refusals. 5. Entry by children under the age of 18 to [the premises] [a specified part of the premises] is prohibited between [insert appropriate hours]. 6. Entry by children under the age of [insert appropriate age] to [the premises] [a specified part of the premises] is prohibited unless accompanied by an adult over the age of 18

20.	A-H	<p><u>Staff Training</u></p> <p>1. All staff whose responsibilities include the retail sale of alcohol shall receive training about the prevention of underage sales on induction and then every <i>[insert appropriate number]</i> months thereafter/<i>[insert appropriate number]</i> times a year. This training shall be recorded and the records to be available on request to the Police or any authorised officer. The training to include:</p> <ul style="list-style-type: none"> a) the operation of the challenge XX scheme; b) types of acceptable ID; c) the method of recording challenges; d) the likely consequences of making an underage sale; e) refusing sales to persons who appear to be drunk; f) proxy sales.
21.	A, B, C, D, F, I	<p><u>Online Deliveries:</u></p> <ol style="list-style-type: none"> 1. Every third-party courier delivery box shall be labelled with the words “Age Restricted Product”. 2. There shall be mechanism either by an App or on the delivery package to show the delivery rider is aware it is an age restricted product to ensure ID checks are made upon delivery of alcohol. 3. The premises licence holder will ensure that an age verification policy will apply whereby all delivery drivers/riders will be trained to ask any customer to whom alcohol is delivered, who appears to be under the age of 25 years to produce, before being sold alcohol, identification being a passport or photocard driving licence bearing a holographic mark or other form of identification that complies with any mandatory condition that may apply to this licence. 4. Alcohol shall only be delivered to a residential or business address and not to a public place or vehicle. 5. All off sales deliveries to be in sealed containers.

		<p>6. A warning shall be displayed on the digital platform on which an order is placed informing customers that they must be aged 18 or over to make a purchase of alcohol and notifying customers that the rider will carry out age verification on delivery. The customer will be required to declare that he or she aged 18 or over. If the rider is not satisfied that the customer is aged 18 or over any alcohol in the order will be withheld</p> <p>7. The Licence holder shall notify the Licensing Authority of the digital platform(s) used for the sales of alcohol and any changes to those platforms.</p>
Miscellaneous (promotes more than one objective)		
22.	A, C, D	<p>8. The premises shall only operate as a restaurant:</p> <ul style="list-style-type: none"> a) in which customers are shown to their table; b) where the supply of alcohol is by waiter or waitress service only; c) which provide food in the form of substantial table meals that are prepared on the premises and are served and consumed at the table; d) which do not provide any take away service of food or drink for immediate consumption; e) which do not provide any take away service of food or drink after 23.00, and f) where alcohol shall not be sold or supplied, otherwise than for consumption by persons who are seated in the premises and bona fide taking substantial table meals there, and provided always that the consumption of alcohol by such persons is ancillary to taking such meals. <p>9. The sale of alcohol for consumption on the premises shall only be to a person seated taking a table meal there, and for consumption by such a person as ancillary to their meal.</p> <p>10. The sale of alcohol shall be to persons seated at the premises, i.e. table service only.</p> <p>11. Sales of alcohol for consumption off the premises shall only be supplied with, and ancillary to a take-away meal.</p>

		<p>12. No more than [<i>insert appropriate figure</i>] % of the sales area shall be used at any one time for the sale, exposure for sale, or display of alcohol.</p> <p>13. No vertical drinking.</p>

Appendix 4:

Licensing Contact Details

A printed version of the policy can be obtained from:

Licensing and Safety Team
Environment Health and Trading Standards
4th Floor Tower Hamlets Town Hall
160 Whitechapel Road
London E1 1BJ

Telephone: 020 7364 5008

Email: licensing@towerhamlets.gov.uk

It is also available for inspection at the above office.

Appendix 5: London Borough of Tower Hamlets

Tower Hamlets Council

Sex Establishment Licensing Policy

Introduction

This policy sets out Tower Hamlets Council's proposed approach to regulating sex establishments and the procedure that it will adopt in relation to applications for sex establishment licences.

The policy of the Council is to refuse applications for sexual entertainment venues. This policy is intended to be strictly applied and will only be overridden in genuinely exceptional circumstances. Such circumstances will not be taken to include the quality of the management, its compliance with licence conditions, the size of the premises or its operating hours.

The policy is intended as a guide to applicants, licence holders, people who want to object to applications and members of the Licensing Committee who are responsible for determining contested applications. It also aims to guide and reassure the public and other public authorities, ensuring transparency and consistency in decision making.

When the decision making powers of the Council are engaged each application will be dealt with on its own merits but this policy gives prospective applicants an early indication of whether their application is likely to be granted or not. It also provides prospective applicants details of what is expected of them should an application be made.

The legal controls for sex establishment premises are contained in the Local Governmental (Miscellaneous Provisions) Act 1982 as amended by the Policing and Crime Act 2009.

There are 3 types of sex establishments which fall into the licensing regime:-

Sex shops

Sex cinemas

Sexual entertainment venues

The role of the Council in its position as Licensing Authority is to administer the licensing regime in accordance with the law and not in accordance with moral standing. The Council recognises that Parliament has made it lawful to operate a sex establishment and such businesses are a legitimate part of the retail and leisure industries.

Policy Rationale

The policy has been developed that sets out how the legislation will be administered and applied. The policy identifies how the Council would exercise the licensing regime in relation to sexual entertainment venues.

The policy has been developed to reflect and complement existing Council plans and strategic approach, namely:-

- Tower Hamlets Community Plan.
- Tower Hamlets Crime & Drug Reduction Partnership Plan.

- Tower Hamlets Enforcement Policy.
- Tower Hamlets Core Strategy.
- Tower Hamlets Town Centre Spatial Strategy.
- Tower Hamlets Statement of Licensing Policy (Licensing Act 2003).
- Tower Hamlets Statement of Licensing Policy (Gambling Act 2005).

The policy has also been prepared with regard to:

- Consultation responses
- Human Rights Act 1998
- Equalities Act 2010

The policy seeks to contribute to the “One Tower Hamlets” principle by fostering community cohesion, reducing inequalities and empowering communities.

The public consultation that was undertaken concerning the adoption of a nil policy did not have overwhelming support. Therefore careful consideration has been given to the policy response, given the balance that the consultation returns did not give overwhelming support.

Policy Considerations

Existing Licensed Premises

The Council has had the ability to licence sex shops and sex cinemas under the Local Government (Miscellaneous Provisions) Act 1982 for many years.

There are no licensed sex shops in Tower Hamlets.

The businesses that hold premises licences under the Licensing Act 2003 with permissions that will be affected by the adoption of the sexual entertainment venue licensing regime are as follows:-

NAME	ADDRESS
THE BEEHIVE	104-106 Empson Street, London, E3 3LT
EONE CLUB	168 Mile End Road, London, E1 4LJ
NAGS HEAD PUBLIC HOUSE	17-19 Whitechapel Road, London, E1 1DU
THE PLEASURE LOUNGE	234 Cambridge Heath Road, London, E2 9NN
WHITE SWAN	556 Commercial Road, London, E14 7JD
ASTON'S CHAMPAGNE AND WINE BAR BASEMENT & 1ST	187 Marsh Wall, London, E14 9SH
CLUB PAISA	28 Hancock Road, London, E3 3DA
OOPS	30 Alie Street, London, E1 8DA
WHITE'S GENTLEMANS CLUB	32-38 Leman Street, London, E1 8EW
SECRETS	43-45 East Smithfield, London, E1W 1AP
IMAGES	483 Hackney Road, London, E2 9ED

Tower Hamlets Council has adopted schedule 3 Local Government (Miscellaneous Provisions) Act 1982 with effect from 1st June 2014 so that it can:

- set a limit on the number of sexual entertainment venues
- determine premises that are appropriate for the borough and
- licence sexual entertainment venues

Sexual entertainment venues are those that regularly provide lap dancing and other forms of live performance or live display of nudity.

Establishments that hold events involving full or partial nudity less than once a month may be exempt from the requirements to obtain a sex establishment licence and applicants are advised to contact the Licensing Team for advice.

Limits on the number of licensed premises

The Council has determined that there are a sufficient number of sex shops, sex cinemas and sexual entertainment venues currently operating in the borough and it does not want to see an increase in the numbers of premises that are currently providing these activities.

The Council intends to adopt a policy to limit the number of sexual entertainment venues in the borough to nil however it recognises that there are a number of businesses that have been providing sexual entertainment in Tower Hamlets for several years. The Council will not apply this limitation when considering applications for premises that were already trading with express permission for the type of entertainment which is now defined as sexual entertainment on the date that the licensing provisions were adopted by the authority if they can demonstrate in their application:

- High standards of management
- A management structure and capacity to operate the venue
- The ability to adhere to the standard conditions for sex establishments

The Council will consider each application on its merit although new applicants will have to demonstrate why the Council should depart from its policy. Furthermore if any of the existing premises cease trading there is no presumption that the Council will consider any new applications more favourably.

Location of premises

The Council's policy is that there is no locality within Tower Hamlets in which it would be appropriate to license a sex establishment. Accordingly, the appropriate number of sex establishments for each and every locality within Tower Hamlets is zero.

As previously stated in the policy the Council will treat each application on its own merits however applicants should be aware that the Council will take into consideration the location of the proposed premises and its proximity to:

- residential accommodation,
- schools,
- premises used by children and vulnerable persons
- youth, community & leisure centres,
- religious centres and public places of worship
- access routes to and from premises listed above
- existing licensed premises in the vicinity

Impact

In considering applications for the grant of new or variation applications the Council will assess the likelihood of a grant causing impacts, particularly on the local community.

The Council will take the following matters into account:

- the type of activity
- the duration of the proposed licence
- the proposed hours of operation
- the layout and condition of the premises
- the use of other premises in the vicinity
- the character and locality of the area
- the applicant's previous knowledge and experience

- the applicant's ability to minimise the impact of their business on local residents and businesses
- any evidence of the operation of existing /previous licences held by the applicant
- any reports about the applicant and management of the premises received from residents, Council officers or the police
- the ability of the proposed management structure to deliver compliance with licensing requirements, policies on staff training and the welfare of performers
- crime and disorder issues
- cumulative impact of licensed premises, including hours of operation
- the nature and concerns of local residents
- any evidence of complaints about noise or disturbance caused by premises
- planning permission and planning policy considerations

In considering applications for renewal the Council will take into account

- the applicant's ability to minimise the impact of their business on local residents and businesses
- any reports about the licensee and management of the premises received from residents, Council officers or the police
- whether appropriate measures have been agreed and put into place to mitigate any adverse impacts
- any evidence of complaints about noise or disturbance caused by premises

In considering applications for transfer the Council will take into account:

- the applicants previous knowledge and experience

- the applicants ability to minimise the impact of their business on local residents and businesses
- any evidence of the operation of existing /previous licences held by the applicant
- any reports about the applicant and management of the premises received from residents, Council officers or the police
- the ability of the proposed management structure to deliver compliance with licensing requirements, policies on staff training and the welfare of performers

Applicants

Where appropriate the Council expects applicants to:

- demonstrate that they are qualified by experience
- have an understanding of general conditions
- propose a management structure which will deliver compliance
- with operating conditions for example through
- Management competence
- Presence
- Credible management structure
- enforcement of rules internally – training & monitoring
- a viable business plan covering door staff, CCTV
- policies for welfare of performers
- demonstrate that they can be relied upon to act in best interests of performers through remuneration, facilities, protection, physical and psychological welfare
- have a transparent charging scheme with freedom from solicitation
- a track record of management compliant premises or employ individuals with such a track record

New applicants may be invited for interview by the Licensing Officer and /or Police Officer prior to the application being referred to the Licensing Committee for determination.

Applications from anyone who intends to manage the premises on behalf of third party will be refused.

Premises appearance and layout

The Council expects premises to:-

- have an external appearance which is in keeping with the locality
- prevent the display outside the premises of photographs or other images which may be construed as offensive to public decency
- adequate lighting to allow monitoring of all public areas
- surveillance by CCTV
- surveillance by CCTV of all private booths

Conditions

The council will prescribe, and from time to time revise, standard conditions which will apply generally to licences that the council will grant or renew.

Through standard conditions the council seeks to ensure that sexual entertainment venues are well managed and supervised, restrict the sexual entertainment activities and the manner in which they are permitted to be provided, protect performers, and control the impact of the venue and its customers in relation to its locality.

Specifically, standard conditions could include measures which are found in the appendix of this policy.

The Application Process

Making a new, renewal, transfer or variation application

The Act requires the Council to refuse all application if the applicant:

- Is under the age of 18 or
- Has had their licence revoked in the last 12 months or
- Is not resident in the UK, or has not been a UK resident for the last 6months or
- Has been refused an application in the last 12 months or
- Is a corporate body which in not incorporated in the UK

Applications forms and details of current fee levels are available:

- on the Council's website (www.towerhamlets.gov.uk)
- from the Licensing Team on 020 7364 5008
- by email to licensing@towerhamlets.gov.uk

The Council prefers to receive electronic applications and offers a choice off payment options the details of which are contained in the application pack.

The Council expects the premises to have planning consent for the intended use and hours of operation, or otherwise have lawful planning status before making an application for a new licence.

In order for the application to be valid the applicant must:

- Submit the completed application form
- Pay the application fee
- Submit a floor plan, drawn to scale showing the layout of the premises(new applications only)

- Submit a location plan (1;1250) showing the location of the premises(NB. plans will not be required for transfers nor renewal applications)
- 2 passport size photos of the applicant where the applicant is an individual rather than a limited company
- 2 passport size photos of the manager if applicant is a limited company(NB: photos will only be required if there has been a change of applicant or manager since the last application)
- Display an A4 notice at the proposed premises for 21 days following the date that the completed application is submitted setting out the application details. The notice must be in a prominent position so that it can be easily read by passers-by. A notice template will be provided with the application form.
- publish a notice on at least one occasion in a local newspaper, during the period of ten working days starting on the day the application was given Council. The advert can be any size or colour but must be readable.

Applicants who wish to advertise the application in another local newspaper are advised to contact the Licensing Team beforehand, to confirm that it is acceptable.

On receipt of a valid application the Council will consult:

- The Police
- The Fire Brigade
- Building Control
- Health and Safety
- Ward Councillors

For new and variation applications the Council will also consult:

- Development Control Team
- Local residents living within 50m of the premises

Authorised Officers from the Council, Fire Brigade and Police may choose to inspect the premises and require works to be carried out to bring the premises up to the required standard before the premises can be used for licensable activities.

The Council will not determine an application for a licence unless the applicant allows an authorised officer reasonable opportunity to enter the premises to make such examination and enquiries as may be necessary to determine the suitability of the applicant and the sex establishment.

Representations

Anyone wishing to object to the application must submit a representation, in writing, within 28 days of the date that the valid application was received by the Council.

Representations can either be submitted via

- Our website: www.towerhamlets.gov.uk
- Email to: licensing@towerhamlets.gov.uk
- Post to: Consumer and Business Regulations, Licensing Team, 6th Floor, Mulberry Place, 5 Clove Crescent, E14 2BG.

A person making a representation must clearly state their name, address, and the grounds for objecting to the application and indicate whether they consent to have their name and address revealed to the applicant. Copies of representations will be made available to the applicant 14 days before the committee hearing.

The Council will not consider objections that are frivolous or vexatious or which relate to moral grounds (as these are outside the scope of the Act).

The Council prefers to receive electronic representations.

Late representations may be admissible at the discretion of the Council if there's sufficient reason to indicate that applicants will not be significantly prejudiced by the decision to allow a late objection to be considered. In making such a decision the Council will take into account:

- The length of the delay
- The amount of time that the applicant has to consider the representation before the hearing date
- If other representations have been received before the deadline

Determining an application

Applications with no representations will be approved under delegated authority to officers.

Applications with representations recommending that conditions be attached to the licence and which are acceptable to both the applicant and person making the representation can be approved under delegated authority to officers.

All other contested applications will be referred to the Licensing Committee for determination. The applicant, anyone making a representation and the ward Councillors will be notified the date, time and venue of the hearing and invited to attend to address the committee in person.

Applications can take up to 14 weeks to be determined. If an application is likely to take longer than 14 weeks to determine the Council will notify the applicant in writing before this deadline. Applications for sex establishment licenses are exempt from the tacit consent provisions of the EU Services Directive on the grounds of public interest and the legitimate interests of third parties.

The applicant will be notified in writing about the outcome of their application within 5 working days of the decision being made.

Sex Establishment licences are usually issued for 12 months, but can be issued for a shorter period if deemed appropriate.

In order to continue operating as a sex establishment the licence holder must make a renewal application prior to the expiry of the existing licence.

Appeals

Any applicant who is aggrieved by a decision to refuse an application or by the imposition of any conditions can appeal to the Magistrates Court within 21 days of receiving the decision in writing.

Grounds for refusing an application

1. The applicant is unsuitable to hold a licence by reason of having been convicted of any offence or for any other reason.
2. That if the license were to be granted, renewed or transferred the business to which it relates would be managed by or carried on for the benefit of a person, other than the applicant, who would be refused the grant, renewal or transfer of such a license if he made the application himself.

3. That the number of sex establishments in the relevant locality at the time the application is made is equal to or exceeds the number which the authority consider is appropriate for that locality.
4. That the grant or renewal of the license would be inappropriate, having regard:-
 - a. to the character of the relevant locality
 - b. to the use to which any premises in the vicinity are put; or
 - c. to the layout, character or condition of the premises, vehicle, vessel or stall in respect of which the application is made.

Transitional Arrangements

Broadly speaking, those existing sexual entertainment venues (lap dancing clubs etc) with a premises licence under the Licensing Act 2003, under which it is lawful to provide such entertainment, will continue to be able to operate for one year after the Council adopts the 2009 Act provisions or, if later, the determination of any application submitted during that year.

The 'transitional period' will last for 12-months beginning with the date that the Council resolves that Schedule 3 as amended by the 2009 Act will come into force in their area ('the 1st appointed day'). Six months following the 1st appointed day will be known as the '2nd appointed day' and the day on which the transitional period ends will be known as the '3rd appointed day'

Existing Operators

To allow time to comply with the new regime, existing operators, who, immediately before the 1st appointed day, have a 2003 Act licence and lawfully use premises as a sexual entertainment venue under that licence or are undertaking preparatory work to use the venue in that way will be allowed to continue to provide relevant entertainment until the 3rd appointed day or the determination of any application they have submitted before that time (including any appeal against the refusal to grant a licence), whichever is later.

For the purposes of the Transition a “2003 Act Licence” means a premises licence or club premises certificate under the Licensing Act 2003 under which it is lawful to provide relevant entertainment.

“Preparatory work” refers to work carried out by an operator, such as a refurbishment or refit, in order that they can use the premises as a sexual entertainment venue in the future. The operator will have been granted a 2003 Act licence before the 1st appointed day but will not have used the premises as a sexual entertainment venue by that date. It is likely that such operators will be known to the Council. However, where a dispute arises between the Council and a licence-holder over whether the licence-holder qualifies as an existing operator by virtue of this provision the Council will need to seek evidence from the licence-holder to demonstrate that they clearly intended to operate a sexual entertainment venue in the future and work had been done to achieve this end.

For the purposes of the Transition a “2003 Act Licence” means a premises licence or club premises certificate under the Licensing Act 2003 under which it is lawful to provide relevant entertainment.

Appointed Days

1st Appointed Day

The day on which the Sexual Entertainment Venue regime comes into force in the Borough and the beginning of the transitional period (1st June 2014)

2nd Appointed Day

The day 6 months after the 1st appointed day (1st December 2014)

3rd Appointed Day

The day 6 months after the 2nd appointed day and the end of the transitional period (1st June 2015)

New Applications

New applicants are people who wish to use premises as a sexual entertainment venue after the 1st appointed day but do not already have a premises licence or club premises certificate to operate as such under the 2003 Act or do have such a licence but have not taken any steps towards operating as such. After the 1st appointed day new applicants will not be able to operate as a sexual entertainment venue until they have been granted a sexual entertainment venue licence.

Determining Applications Received On or Before the 2nd Appointed Day

Applicants will be able to submit their application for a sexual entertainment venue from the 1st appointed day onwards.

As the Council is able to refuse applications having regard to the number of sex establishments they consider appropriate for a particular locality, all applications made on or after the 1st appointed day but on or before the 2nd appointed day shall be considered together. This will ensure that applicants are given sufficient time to submit their application and all applications received on or before the 2nd appointed day are considered on their individual merit and not on a first come first serve basis.

No applications shall be determined before the 2nd appointed day. After the 2nd appointed day the appropriate authority shall decide what if any licences should be granted. If a new applicant is granted a licence it will take effect immediately. If an existing operator is granted a licence, it will not take effect until the 3rd appointed day, up to which point they will be allowed to continue to operate under their existing premises licence or club premises certificate.

Determining Applications Received After the 2nd Appointed Day

Applications made after the 2nd appointed day shall be considered when they are made but only once all applications made on or before that date have been determined. However, reference to determination here does not include references to the determination of any appeal against the refusal of a licence.

As with applications received on or before the 2nd appointed day, licences granted to new applicants shall take effect immediately and licences granted to existing operators shall take effect from the 3rd appointed day or, if later, the date the application is determined.

Outstanding Applications

The Council will attempt where possible to determine outstanding applications made under the 2003 Act, which include an application for the provision of relevant entertainment, before the date that Schedule 3 as amended by the 2009 Act comes into force in their area.

Where it has not been possible to determine application before the 1st appointed day, applicants will need to submit an application for a sex establishment licence as set out in Schedule 3 if they wish to provide relevant entertainment. From the 1st appointed day onwards outstanding applicants shall be dealt with as though they are new applicants

Additional information and advice

Please contact:

Consumer and Business Regulations
Licensing Team
6th Floor,
Mulberry Place,
5 Clove Crescent, E14 2BG.
licensing@towerhamlets.gov.uk 020 7364 5008

Appendix 6

Special Cumulative Impact Policy for the Brick Lane and Bethnal Green Area

1. The Licensing Authority has adopted a special policy relating to cumulative impact in areas of:
 - Brick Lane
 - Bethnal Green

This special policy creates a rebuttable presumption that applications for the grant or variation of premises licences or club premises certificates which are likely to add to the existing cumulative impact will normally be refused following the receipt of representations, unless the applicant can demonstrate in the operation schedule that there will be no negative cumulative impacts with one or more of the licensing objectives.

2. The Council reviewed the Special Cumulative Impact Policy in 2021 and, following consultation, decided it was still of the opinion that the concentration of licensed premises within Brick Lane area was having a cumulative impact on the licensing objectives of crime and disorder and prevention of public nuisance. As part of the review in 2021, the Council also decided that the concentration of licensed premises within the Bethnal Green area was also having a cumulative impact on the licensing objectives of crime and disorder and prevention of public nuisance.

Review of Cumulative Impact Assessment - Supporting Evidence

3. In determining the Councils CIAs for the area of Brick Lane and Bethnal Green (Figures One and Two Below) the Council considered the following evidence:
 - Hot spot maps of incidents of crime and disorder and ASB linked to Licence premises in the defined areas for 2017 to 2020.
 - Complaint data from Environmental Health and Trading Standards relating to Noise and Licensing.
 - Licence Application data for the defined areas for 2017 to 2020
 - Results of the Consultation, that included Survey data and comments and written responses.

This evidence is published on our website:

<http://democracy.towerhamlets.gov.uk/ieListDocuments.aspx?CId=309&MId=12361>.

Cumulative Impact Assessments (Brick Lane and Bethnal Green)

4. The Licensing Authority is of the view that the number, type and density of premises selling/supplying alcohol for consumption on and off the premises and/or the provision of late night refreshment in the Brick Lane and Bethnal Green Areas (highlighted in Figures One and Two below) is having a cumulative impact on the licensing objectives. Therefore, it is likely that granting further licences would be inconsistent with the authority's duty to promote the licensing objectives. Thus, it has declared a cumulative impact assessment within these areas.
5. The Brick Lane and Bethnal Green CIAs aim to manage the negative cumulative impact of the concentration of licensed premises in these areas and the stresses that the saturation of licensed premises has had on the local amenity, environmental degradation and emergency and regulatory services in managing this impact.
6. The effect of this Special Cumulative Assessment Policy will apply to the following types of applications:
 - New Premises Licences applications,
 - New Club Premises Certificates applications
 - Provisional Statements,
 - Variation of Premises Licences and Club Premises Certificate applications (where the modifications are relevant to the issue of cumulative impact for example increases in hours or capacity).

However, it will only apply where the application seeks to permit the Licensable activities of:

- the sale or supply of alcohol for consumption on or off the premises, and/or,
- the provision of late night refreshment.

7. **This Policy will be strictly applied and where relevant representations are received and it is the view of the Council that the application will be refused. Applicants will need to demonstrate that there are exceptional circumstances and that granting their application will not negatively add to the cumulative effect on the Licensing Objectives within the Brick Lane and Bethnal Green CIAs if they wish to rebut this presumption.**
8. The Special Cumulative Impact policy creates a rebuttable presumption that where relevant representations are received by one or more of the responsible authorities and/or other persons against applications (Councillors, Members of the Public) within the CIA zones the application will be refused.
9. Where representations have been received in respect to applications within the CIA zones the onus is on the applicant to adequately rebut the presumption.
10. It must be stressed that the presumption created by this special policy does not relieve responsible authorities or other persons of the need to make a representation. If there are no representations, the licensing authority must grant the application in terms that are consistent with the operating schedule submitted in line with their delegated authority.
11. This special policy is not absolute and the Licensing Authority recognises that it has to balance the needs of businesses with local residents. The circumstances of each application will be considered on its merits and the Licensing Authority shall grant applications, when representations are not received. The applicant should demonstrate that the operation of the premises will not add to the cumulative impact on one or more of the following licensing objectives:
 - Prevention of Crime and Disorder;
 - Prevention of Public Nuisance.

Therefore, applicants will be expected to comprehensively demonstrate why a new or varied licence will not add to the cumulative impact. They are strongly advised to give consideration to mitigating potential cumulative impact issues when setting out steps they will take to promote the licensing objectives in their operating schedule.

12. The Special Cumulative Impact policy will not be used to revoke an existing licence or certificate and will not be applicable during the review of existing licences.

Possible exceptions to the Brick Lane and Bethnal Green Cumulative Impact Assessments

- Applications for licences for small premises with a capacity of fifty persons or less who only intend to operate within framework hours, and that;
 - Only have consumption of food (late night refreshment) and drink (alcohol) on the premises only,
 - Only provide Off sales of food (late night refreshment) and drink (alcohol) for delivery (i.e. not for take away),
 and,
 - Have arrangements to prevent vertical drinking, for example fully seated venues;
- Applications for licences that are not alcohol led (e.g. Hairdressers wanting to provide alcohol to clients during their hair cut/treatments), .
- Applications for licences where the applicant has recently surrendered a licence for another premises of a similar size and providing similar licensable activities in the same CIA Area.

Licensing Authority will **not** consider the following as possible exceptions:

- that the premises will be well managed and run,
- that the premises will be constructed to a high standard,
- that the applicant operates similar premises elsewhere without complaint.

The Cumulative Impact Assessment Areas for the Brick Lane and Bethnal Green

13. The Cumulative Impact Assessment Areas are detailed in the maps below.

Figure One – Brick Lane CIZ

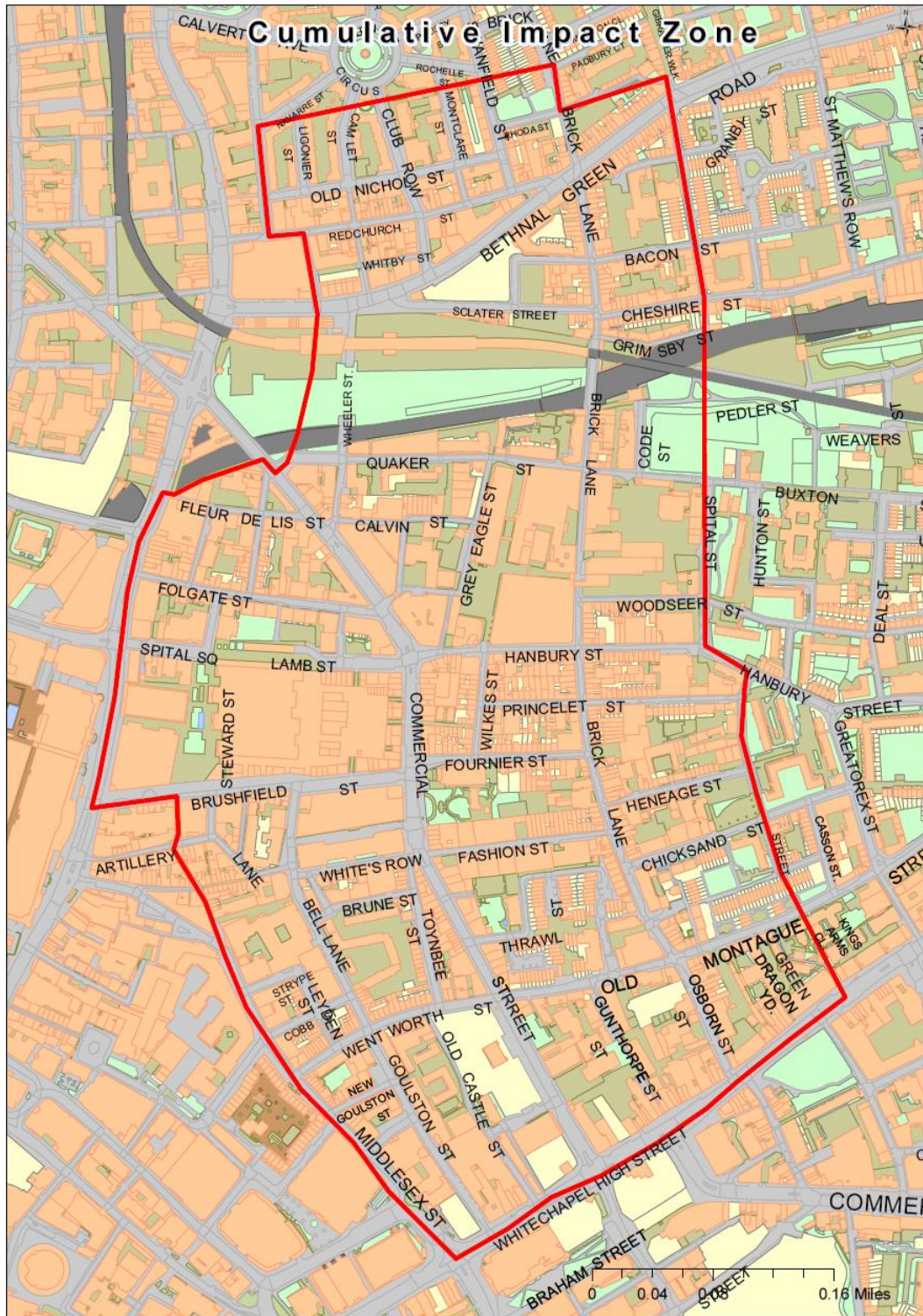
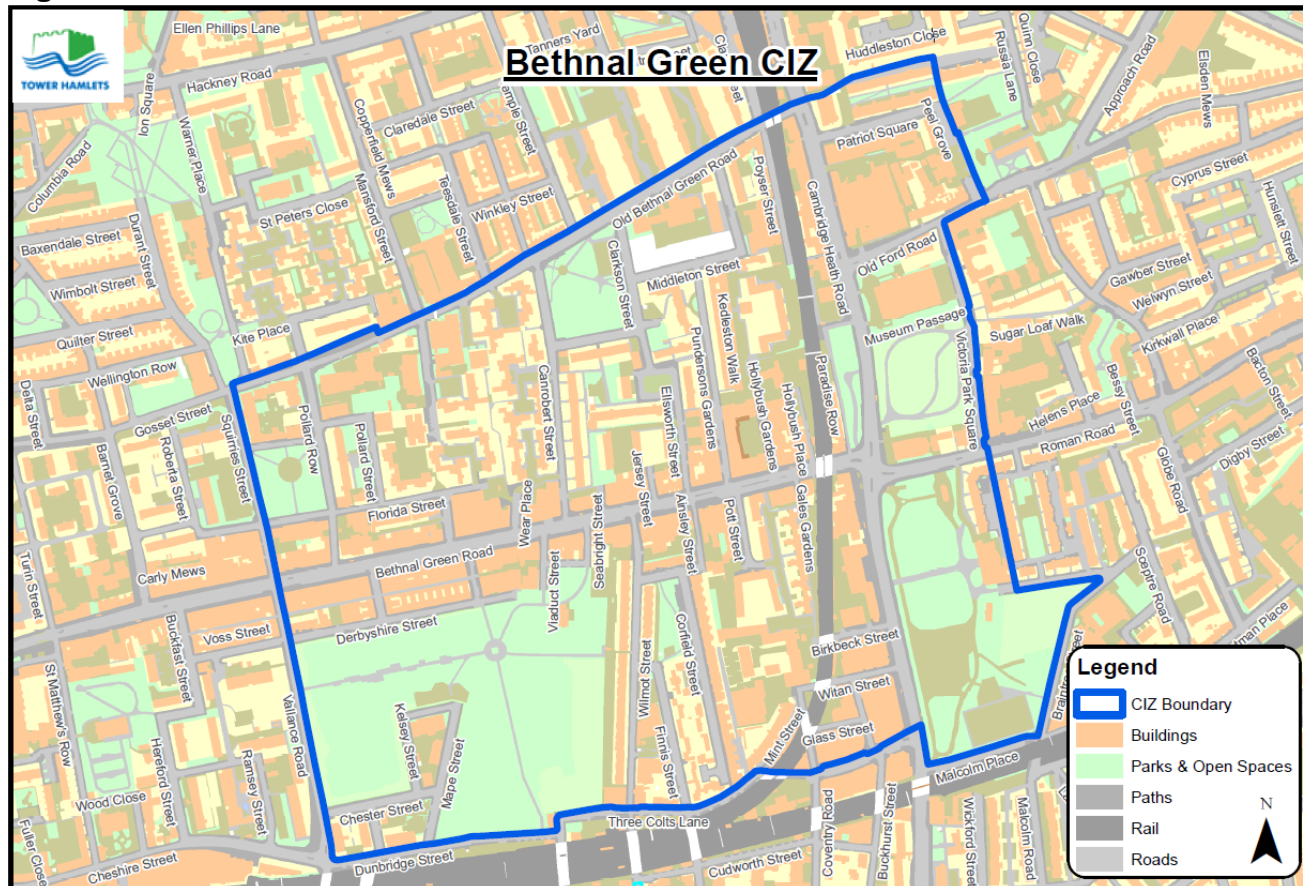


Figure Two – Bethnal Green CIZ



Statement of Licensing Policy Review 2023 - Survey

SURVEY RESPONSE REPORT

26 February 2020 - 24 April 2023

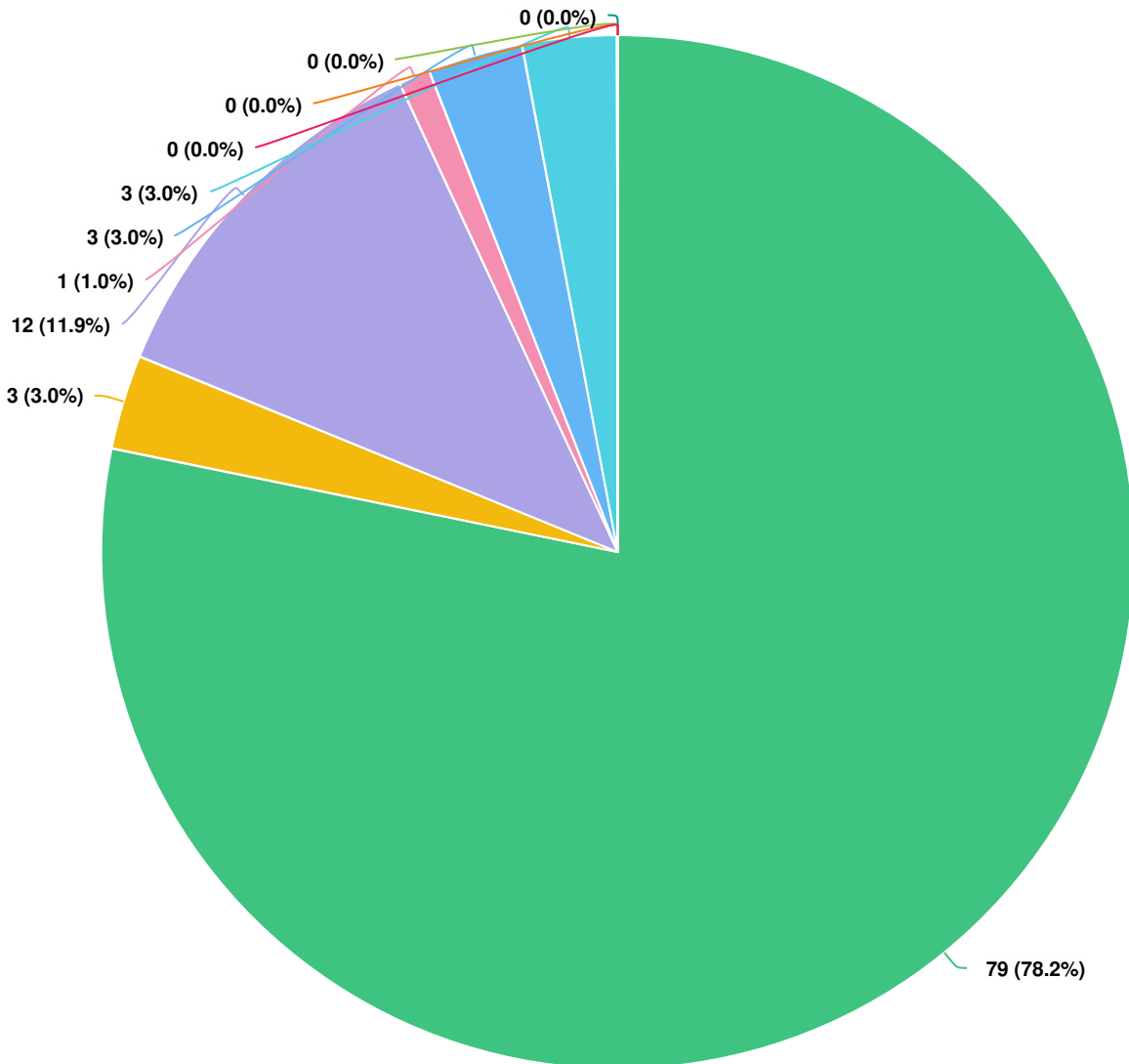
PROJECT NAME:

Statement of Licensing Policy Review Consultation 2023



SURVEY QUESTIONS

Q1 Please select the title below that best describes you?

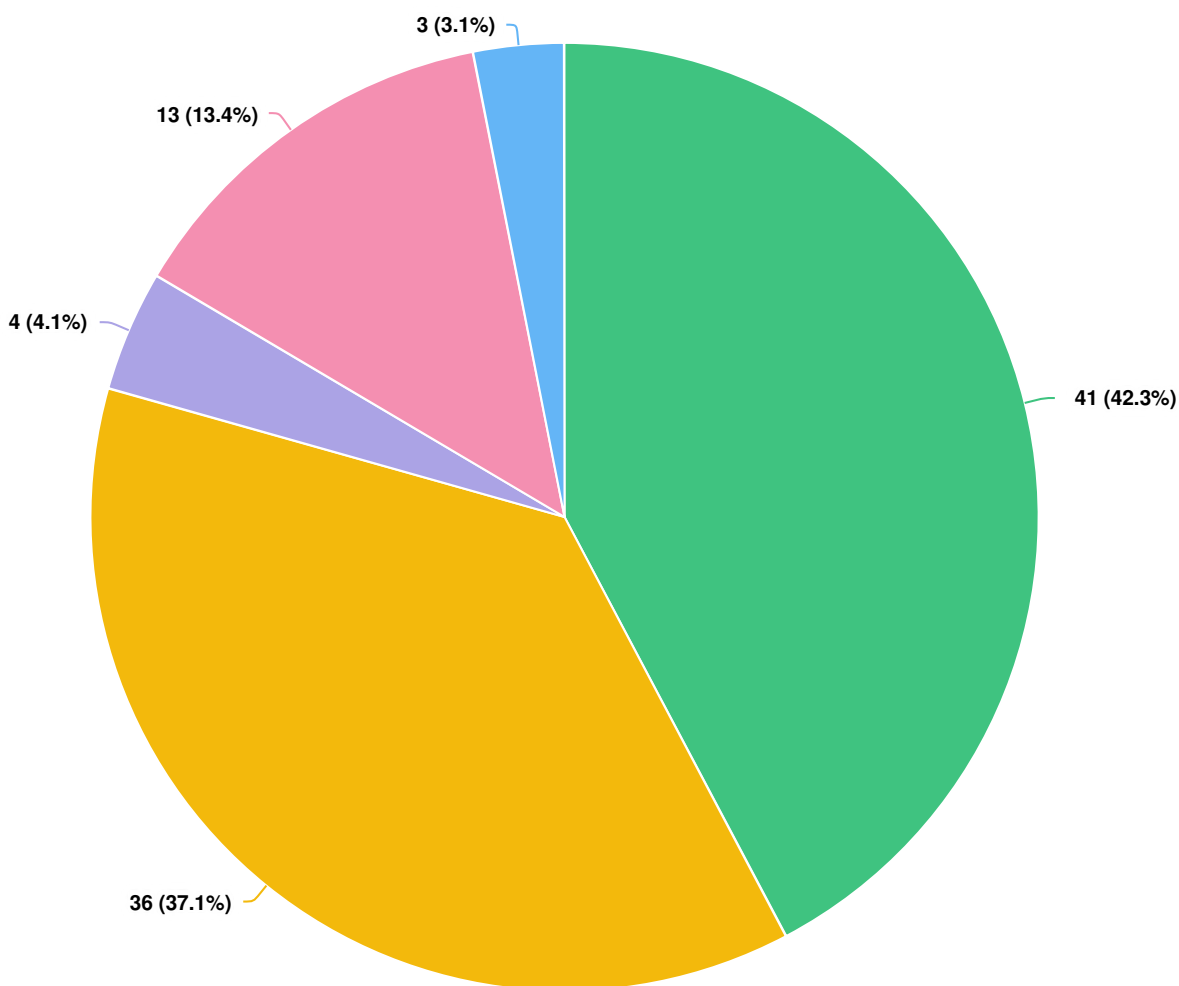


Question options

- Resident of Tower Hamlets
- Resident not Tower Hamlets
- Licensee of Tower Hamlets
- Business of Tower Hamlets
- Responsible Authority (e.g. Police, LFB etc.)
- Other (please specify)
- Licensee not Tower Hamlets
- Business not Tower Hamlets
- Trade Body/Organisation
- Legal Professional (e.g. Solicitor)

Mandatory Question (101 response(s))
 Question type: Dropdown Question

Q2 Tower Hamlets currently does a 40-metre voluntary consultation via letter to residents to advise them that we have received an application for a licence. This consultation was dropped during the Coronavirus Pandemic, and we instead place a list of...

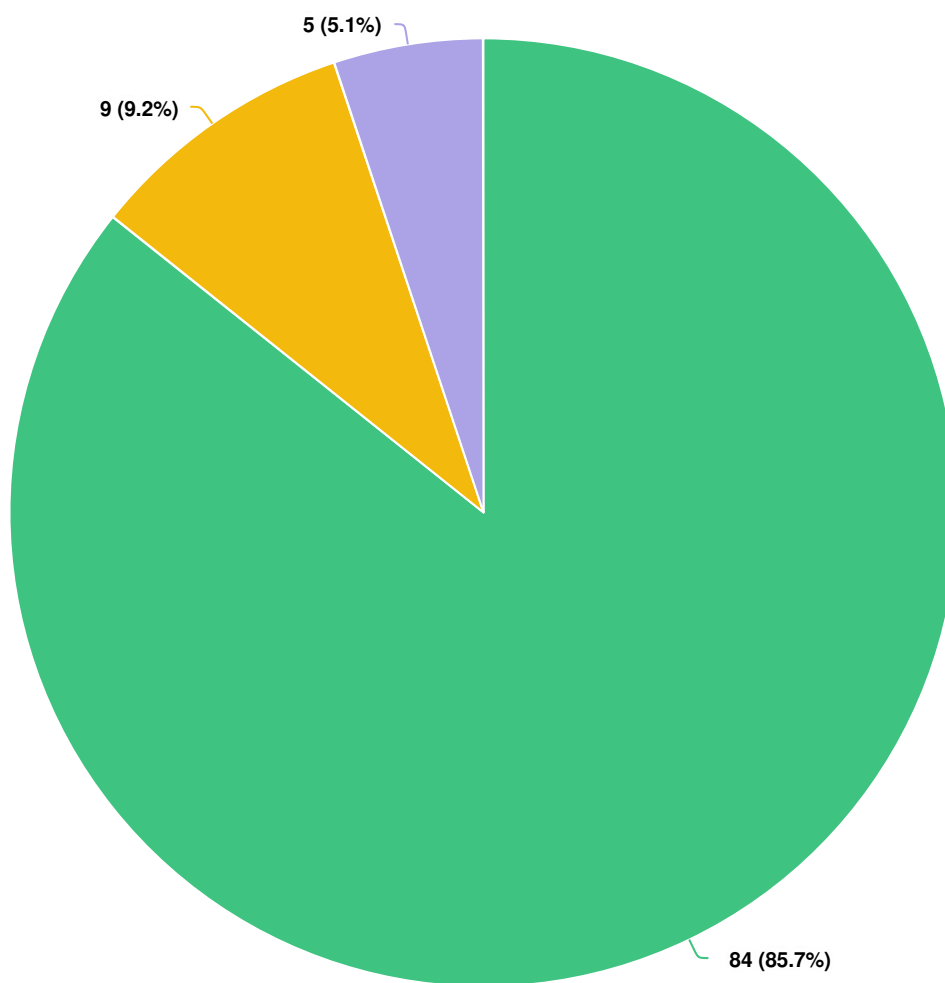


Question options

- Keep Voluntary consultation as it is (40 metres)
- Increase the Voluntary consultation to 50 metres
- Decrease the Voluntary consultation to 30 metres
- Cease the Voluntary consultation
- Other (please specify)

Optional question (97 response(s), 4 skipped)
Question type: Dropdown Question

Q3 | Do you agree with the below paragraph, which seeks to add conditions to licences, where appropriate, to require refusal of entry/service to those using NOx.?Psychoactive Substances, e.g. Nitrous Oxide (NOx) – Misuse of nitrous oxide is associated w...



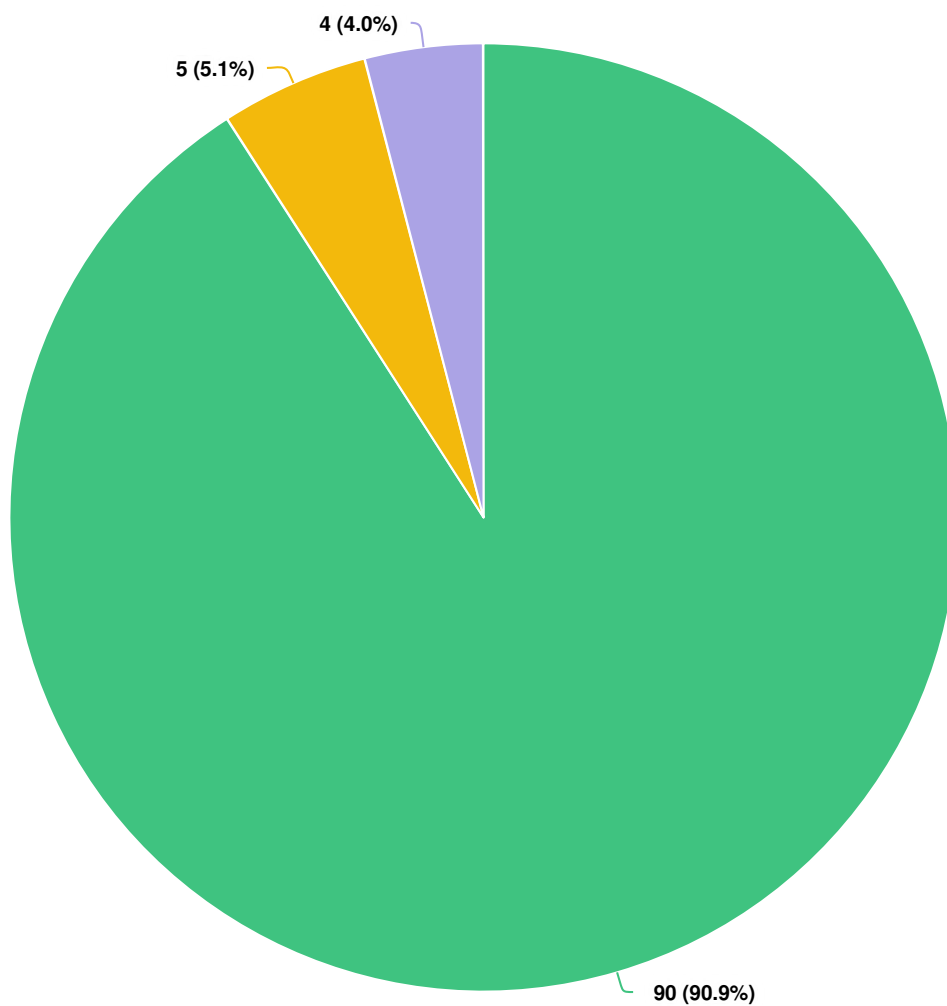
Question options

- Yes
- No
- Other (please specify)

Optional question (98 response(s), 3 skipped)

Question type: Dropdown Question

Q4 | Do you agree with the below paragraph, which seeks to add conditions to licences, where appropriate, to prevent drinks spiking? Drinks spiking – in reference to the Local Governments Association (LGA) Guidance note on drink spiking prevention, this ...



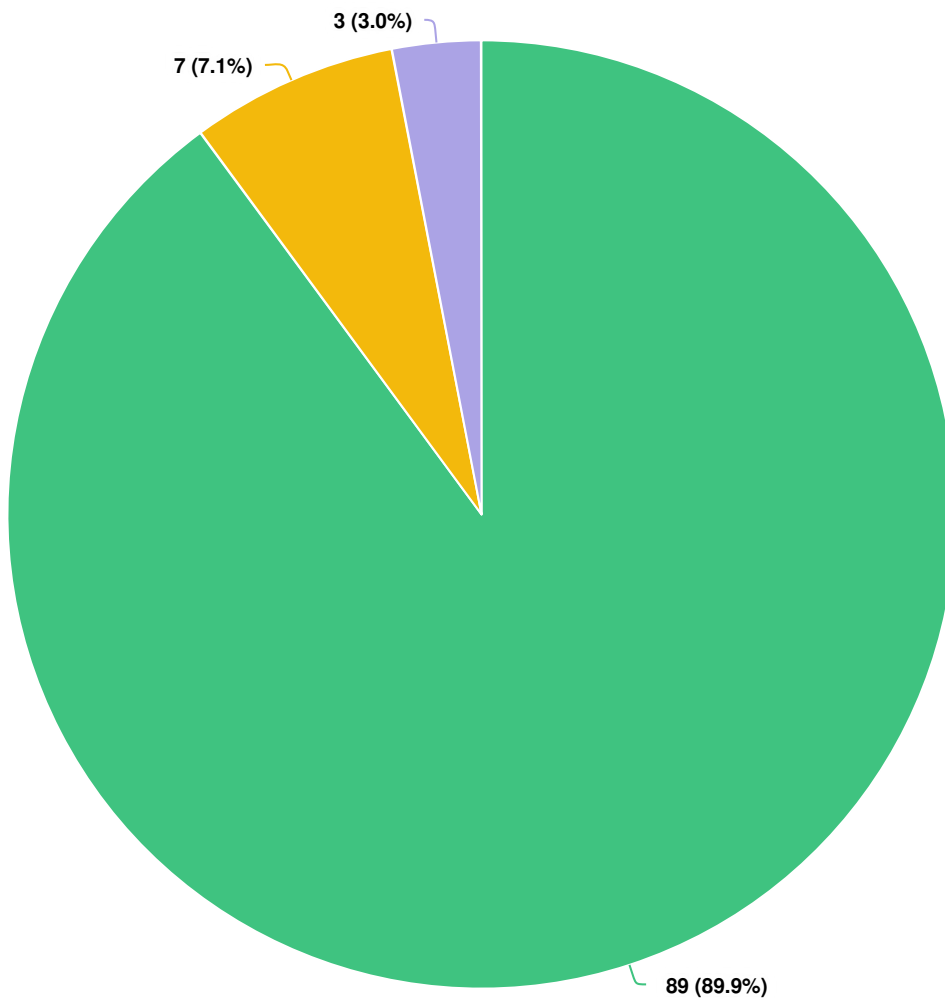
Question options

● Yes ● No ● Other (please specify)

Optional question (99 response(s), 2 skipped)

Question type: Dropdown Question

Q5 Do you agree with below paragraph, which seeks to encourage licensed premises to train their staff in Welfare and Vulnerability Engagement? Welfare and Vulnerability – This Licensing Authority believes that all Licensed venues should train their sta...



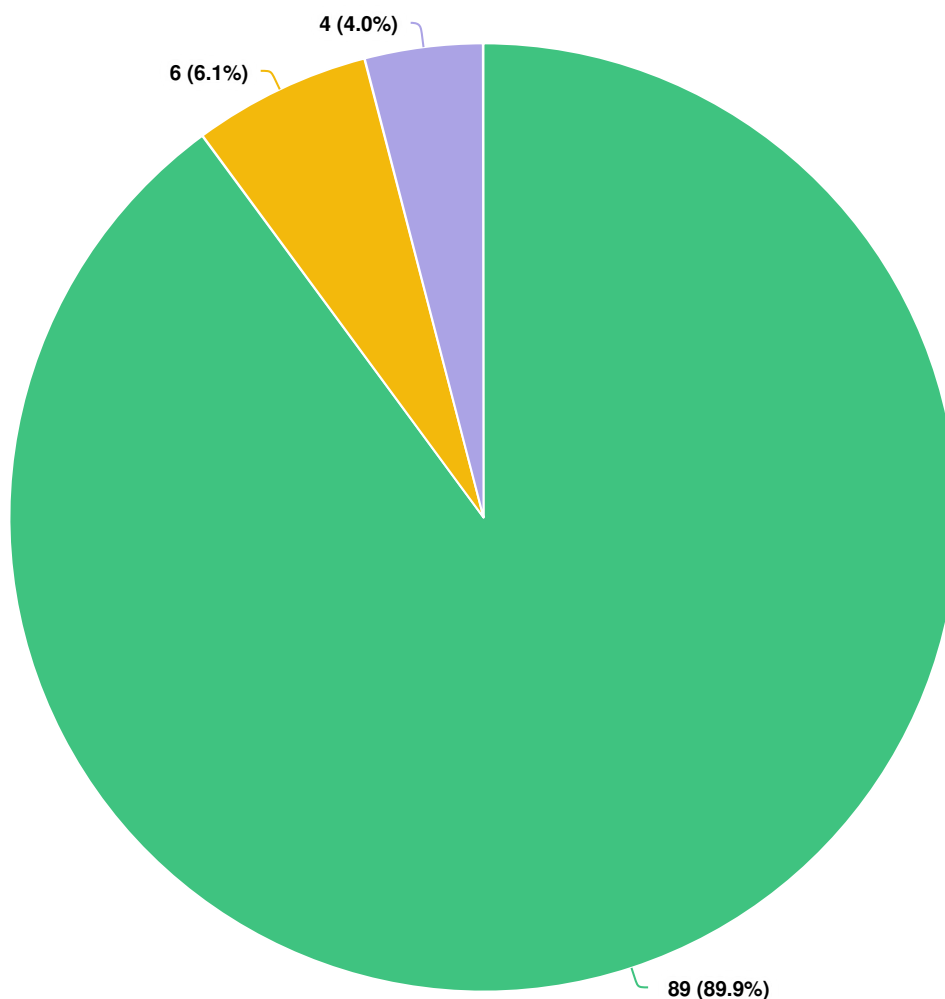
Question options

- Yes
- No
- Other (please specify)

Optional question (99 response(s), 2 skipped)

Question type: Dropdown Question

Q6 Do you agree with the below paragraph that encourages licence holders to sign up to Women’s Night Safety Charter and refuse entry/service in the event of an act of misogyny within a licensed premises? Misogyny in the Night Time Economy – sadly this ...



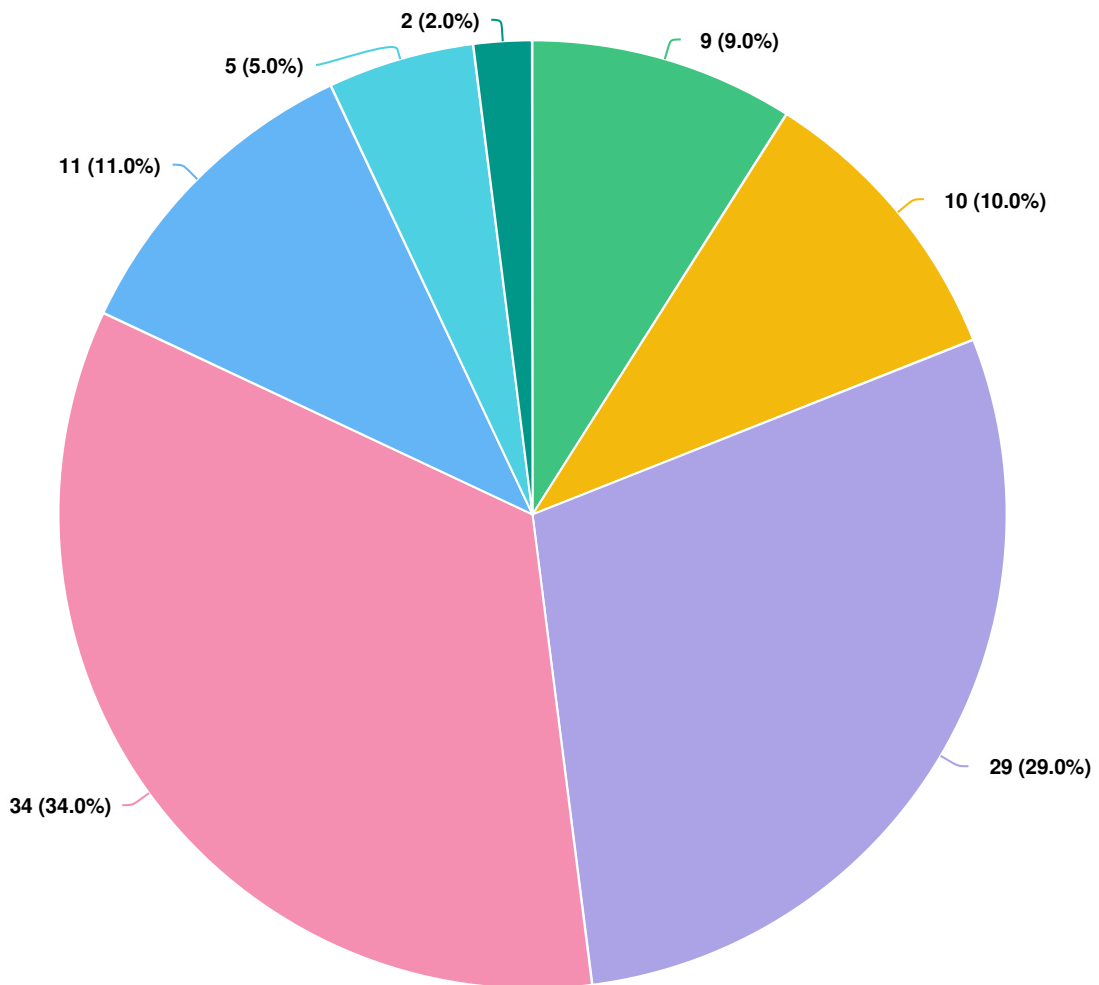
Question options

- Yes
- No
- Other (please specify)

Optional question (99 response(s), 2 skipped)

Question type: Dropdown Question

Q7 | The reviewed policy is seeking to restrict the use of Beer Gardens or similar areas after a certain time where the use of this area could cause nuisance to residents. What time do you agree would be most realistic in terms of preventing nuisance whi...

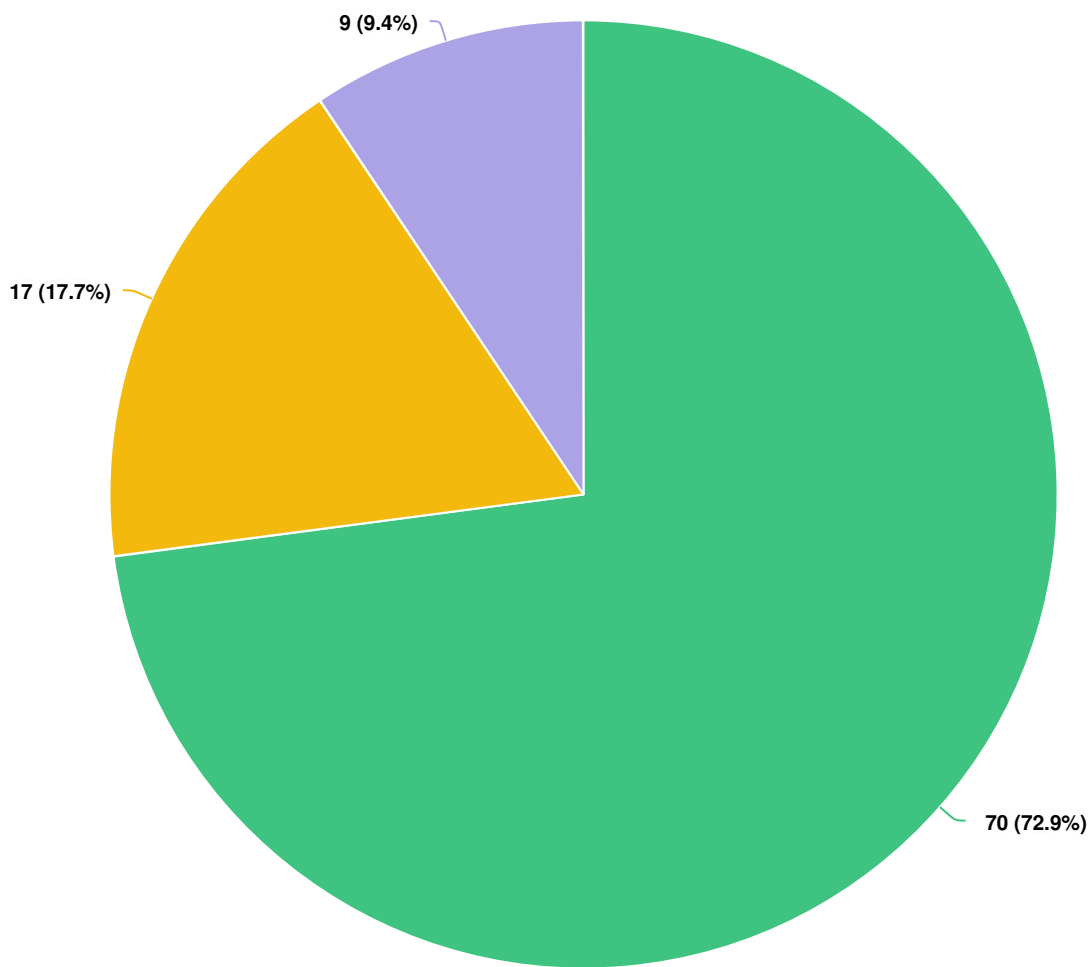


Question options

- 8pm
- 9pm
- 10pm
- 11pm
- 12am
- No restriction
- Other (please specify)

Optional question (100 response(s), 1 skipped)
Question type: Dropdown Question

Q8 Do you agree that applicants for Party Boats should be expected to adopt one or more of the below conditions as appropriate to their proposed application? a) For all externally promoted events including DJs, birthday bookings (where the person whose...



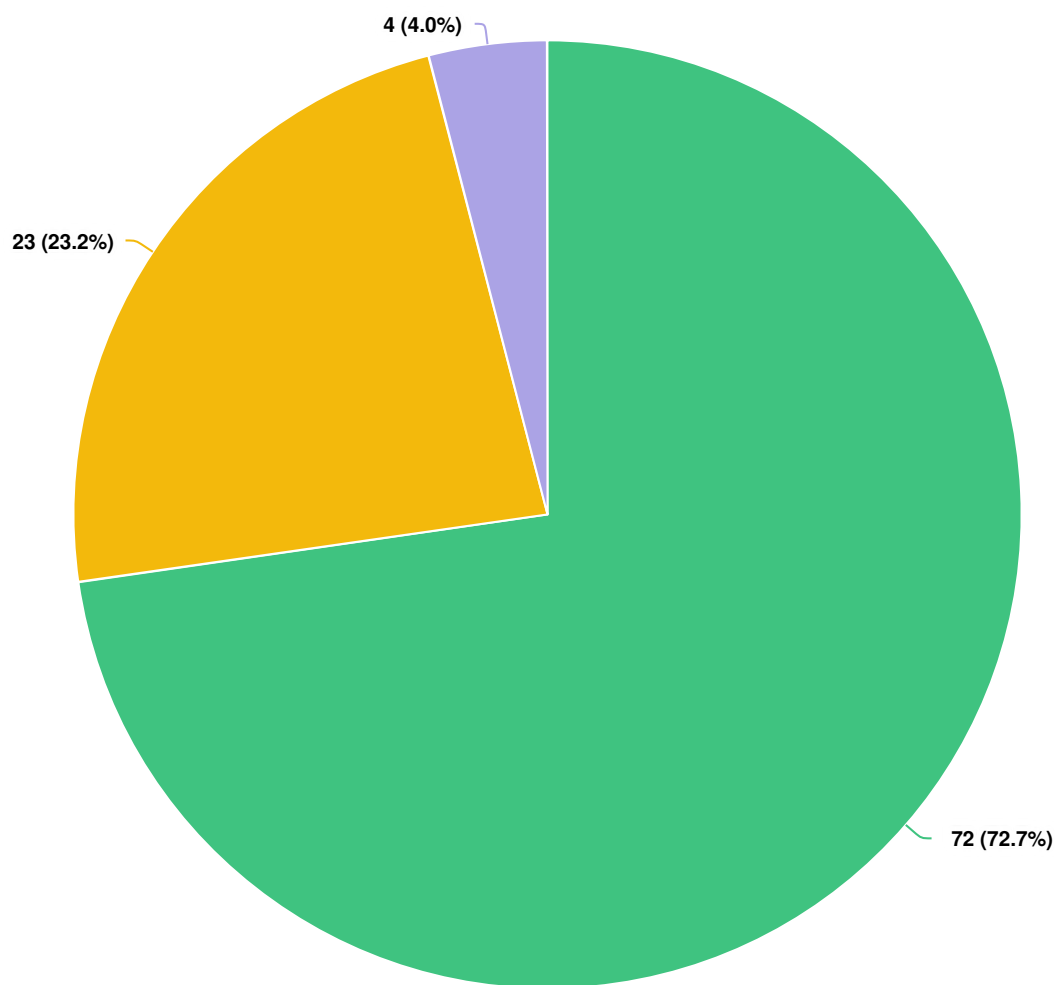
Question options

- Yes
- No
- Other (please specify)

Optional question (96 response(s), 5 skipped)

Question type: Dropdown Question

Q9 | We currently offer to certify films for licensed premises wanting to show films that have yet to be certified by the British Board of Film Classification (BBFC).The reviewed policy will refer applicants to the BBFC for all film certifications. Thi...



Question options

- Yes
- No
- Other (please specify)

Optional question (99 response(s), 2 skipped)

Question type: Dropdown Question

Q10 | If you have any other comments you wish to make in response to the reviewed Statement of Licensing Policy 2023 - 2028 please add these below:

[REDACTED]
1/19/2023 04:19 PM

Licensing should be reviewed every 6 months.

[REDACTED]
1/20/2023 04:51 PM

no

[REDACTED]
1/25/2023 10:33 PM

Cross border collaboration with Hackney council - they need to abide to similar licensing policies and be held responsible for the night-time related ASBs brought to our borough. They should not be any license granted to premises within the courtyards shared with residents. The council should also look into the event licenses which premises used to encroach on residential areas. The Boundary TRA had to fight off the organisation On-Redchurch (funded by major developers but impersonating as a community group) who tried to stage street parties on the Boundary Estate. The previous council funded this organisation and the event and public realm department initially approved their event. After discussing with the council event team, the event was finally halted. Please be careful who you fund or support. On Redchurch is not a community group. No street parties in dense residential estate please.

[REDACTED]
1/27/2023 12:11 PM

We need more cultural events in towers hamlets - this includes clubs. Save London's nightlife!

[REDACTED]
1/27/2023 12:32 PM

Should any changes be made to established businesses that could potentially put those businesses at risk, those businesses should receive support from the council to ensure their survival in keeping with the original business ethos.

[REDACTED]
1/27/2023 03:11 PM

When a new license is granted I think that a minimum time limit should be placed on the premises which would prohibit them from going back to the licensing authority seeking changes and variations to the license they have been granted, I think that a one year minimum time limit would be reasonable, this would hopefully stop the practice of newly licensed premises who were not originally granted all they had asked for from just reapplying again a few months down the line, if they operate in a responsible way during the first year of operation then by all means apply again with a years worth of evidence on how the premises operated.

[REDACTED]
1/27/2023 04:55 PM

TENS applications must include a fire safety policy for the location, and 40 metre zone mitigation strategy to manage crowd control, noise and nuisance, storage for empties and cigarette butts, prevention of lewd behaviour and public urination, all in the immediate vicinity of the event location.

[REDACTED]
1/27/2023 09:53 PM

I'd like a Sainsbury's in Wapping, also a Primark and any shops as we have three closed premises in Wapping Lane - including the bakers, recently. This is a highly residential area (not solely wealthy people) and we have minimal facilities and an elderly population relying on the two local buses. Instead of another sports bar/rubbish Italian restaurant why not an arts cinema? Who pays, wins.

[REDACTED]
1/27/2023 11:07 PM

Local residents must be consulted on applications for new fast food businesses.

[REDACTED]
1/28/2023 02:18 AM

Pubs and other licenced to venue should not be permitted to allow customer to take drinks and smoke outside their venue because they block the pavement, causing residents and other footpath user to walk on road or take other routes. It also noise nuisance for residents living near these establishments during the summer.

[REDACTED]
1/28/2023 10:49 AM

The decline of lgbtq+ clubs and party spaces is a travesty in Tower Hamlets. Last year's targetting of Klub Verboten and Crossbreed was a shame on the council and the license conditions of prohibiting semi-nudity in private venues targets these institutions directly. I am sure you have never been to one of these spaces, but they are havens of freedom of expression, safety, and community. Historically, lgbtq+ spaces have always been targetted for being 'immoral' and 'different'. These spaces do not hurt anyone, they make it clear the dress standards are flexible for those attending, and they contribute to lgbtq+ life in the city. They are away from family and residents, usually in very shut off warehouses. As a young Bangladeshi lgbtq+ person, Tower Hamlets thriving queer scene is one of my favourite things about the Borough. My friends all over London are often jealous about the quality of nightlife here! Here is an article on Tower Hamlets moral panic and targetting: <https://mixmag.net/read/fetish-parties-attacked-by-tower-hamlets-council-news/>. Please be on the right side of history.

[REDACTED]

The decline of lgbtq+ clubs and party spaces is a travesty in Tower

1/28/2023 10:49 AM

Hamlets. Last year's targetting of Klub Verboten and Crossbreed was a shame on the council and the license conditions of prohibiting semi-nudity in private venues targets these institutions directly. I am sure you have never been to one of these spaces, but they are havens of freedom of expression, safety, and community. Historically, lgbtq+ spaces have always been targetted for being 'immoral' and 'different'. These spaces do not hurt anyone, they make it clear the dress standards are flexible for those attending, and they contribute to lgbtq+ life in the city. They are away from family and residents, usually in very shut off warehouses. As a young Bangladeshi lgbtq+ person, Tower Hamlets thriving queer scene is one of my favourite things about the Borough. My friends all over London are often jealous about the quality of nightlife here! Here is an article on Tower Hamlets moral panic and targetting: <https://mixmag.net/read/fetish-parties-attacked-by-tower-hamlets-council-news/>. Please be on the right side of history.

[REDACTED]
1/28/2023 11:26 AM

Greater protection for historically & pre-existing licensed premises against any new complaints & challenges especially relating to noise. Support to retain licensed venues as socially & culturally significant places and stricter governance regarding change or restrictions to their use.

[REDACTED]
1/29/2023 03:06 PM

We need bins in Tower Hamlets - where are they ? This would also help the anti social behaviour if people see the are is taken care of -

[REDACTED]
1/30/2023 08:38 PM

Nox is by far a bigger issue than is currently acknowledged. There needs to be prosecution of vendors of nox and monitoring / actions around its use, particularly on streets and in cars.

[REDACTED]
2/01/2023 10:44 AM

The process of applying and paying for TENs seems clunky and long winded which allowed for increased margin for error. It would be great if this application process was streamlined via the online portal to allow for swift and concise applications, resulting in a reduction in admin on from both the applicant and council processor.

[REDACTED]
2/02/2023 04:16 PM

Majority of these rules and regulations seem to be adding more and more compliance to bars & restaurants who are already pretty good in providing a safe environment to guests. It feels like these resources would be better utilised in more public areas.

[REDACTED]

Please confirm whether the council are conducting proper cumulative

2/06/2023 01:24 PM

impact assessments in relation to any cumulative impact areas retained or proposed

2/09/2023 10:11 AM

Pubs in residential areas cause the least problems of all licensed premises and suffer the strictest licensing regulations, furthermore, they existed long before current local residents moved to the area, as such leave them have their beer gardens until 11pm. Maybe 10pm on a Sunday.

2/15/2023 10:07 PM

I do agree with all the above points.

2/20/2023 09:14 AM

Safety first. Keep noise levels down whilst docked and close by to residential premises. Only allow the party to start when the boat has set off.

3/03/2023 08:48 PM

Drinking in the street / public highway / parks should be much more closely regulated and the police / council should have powers to regulate this and publicans should be held responsible for patrons causing nuisance outside their premises.

3/04/2023 12:48 PM

When licensed premises apply to have outside seating and service it is vital that neighbours are contacted before anything is granted. What has happened in our area in the past - E2 /Weavers Ward - is that people sitting outside drinking at night in Columbia Road and Ezra Street attract others who bring their own bottles and cans and sit in the street nearby. They then make a lot of noise and sometime urinate in the street. It can be a real problem in the summer nights and it would be great if it could be monitored.

3/04/2023 10:58 PM

Please keep supporting and developing the night life economy.
Please create a kink and queer friendly environment

3/08/2023 01:32 PM

Only comments I have is regarding party boats. As a lifelong resident and someone whose family home is on the Riverside, the party boats never have caused us issue. I find it annoying that "newcomers" in the expensive Riverside apartments complaining about the river, it has been busy for the past 1000 years. These same people never stay or lay down roots in the area, these people come and stay for five minutes and think they have the right to complain and trying to get things changed. Listen to the actual long term residents as opposed to the transient community in million pound apartments.

[REDACTED]
3/08/2023 09:56 PM

For drinking outlets within a 100 metres from dense residential estates, there must be tighter controls on spillover effects such as car bars where patrons continue to party and drink after the outlets closed., these on-premise outlets must not have takeaway drinking off premise license to prevent this.

[REDACTED]
3/13/2023 09:57 AM

Keep up with reviewing the licensing policy to keep everyone safe

[REDACTED]
4/05/2023 03:09 PM

Please review licenses in the case where flats/houses have been built next to venues - or at least enforce existing license requirements more strongly. New residents have to adapt to the area but only based on reasonable expectation: for instance it is reasonable to expect a pub in a residential area does not have a late night music license. Also, please consider the impact of loitering near the premises when determining licensing. Late night noise and chatter in public areas have impacted us severely, and venues claim it is not their responsibility to manage public areas.

[REDACTED]
4/05/2023 03:22 PM

Numerous spelling and other errors in the questionnaire (eg para b and P in boating section are the same)

[REDACTED]
4/08/2023 06:19 PM

Large venues like the one in wapping called skylight cause issues all over like a half mile in all directions

[REDACTED]
4/11/2023 01:20 PM

Apart from the minor litter problem, it is not true to state (as you have here) that nitrous oxide is associated with increased antisocial behaviour. This a pejorative claim made without evidence. Such a statement should have no place in a 'neutral' survey.

Optional question (31 response(s), 70 skipped)

Question type: Essay Question

Equality Impact Analysis Screening Tool

Section 1: Introduction

Name of proposal For the purpose of this document, 'proposal' refers to a policy, function, strategy or project
Statement of Licensing Policy 2023 Review
Service area and Directorate responsible
Place/Public Realm
Name of completing officer
Tom Lewis, Team Leader, Licensing and Safety, Environmental Health and Trading Standards
Head of Service
David Tolley, Head of Service, Environmental Health and Trading Standards

The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between those with 'protected characteristics' and those without them
- Foster good relations between those with 'protected characteristics' and those without them

This Equality Impact Analysis provides evidence for meeting the Council's commitment to equality and the responsibilities outlined above. For more information about the Council's commitment to equality, please visit the Council's [website](#).

Section 2: Summary of proposal being screened

Describe the proposal including the relevance of proposal to the general equality duties and protected characteristics under the Equality Act 2010

This is a Policy that the Council has a legal requirement to adopt under the Licensing Act 2003. The Council must prepare and publish a Statement of Licensing Policy at least every 5 years. The

policy sets out in detail how the licensing authority (Council) will discharge its licensing functions under the Licensing Act 2003.

There are four licensing objectives set out in the Licensing Act 2003, as follows:

1. the prevention of crime and disorder,
2. the prevention of public nuisance,
3. public safety,
4. the protection of children from harm.

In considering the policy in view of the Equality Act 2010, though there could be a view that there may be an effect on religious/believe the reason for the policy is statutory. Therefore, in view of this and the new addition of "Equality and Inclusion in Licensed Venues" section, which discusses PSED and links the policy to the Council's Equality Policy, it does not appear that there are likely to be any adverse effects on people who share Protected Characteristics as defined by the 2010 Act.

Section 3: Equality Impact Analysis screening

Is there a risk that the policy, proposal or activity being screened disproportionately adversely impacts (directly or indirectly) on any of the groups of people listed below?	Yes	No	Comments
Please consider the impact on overall communities, residents, service users and Council employees. This should include people of different:			
<ul style="list-style-type: none"> ▪ Sex 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>More females than men are prone to sexual harassment in the nighttime economy. The policy sets out our expectations of licence holders relating to sexual harassment in the Night Time Economy by encouraging licensed venues to sign up to the Mayor of London's Women's Night Safety Charter. As well as the Women's Night Safety Charter we encourage applicants and license holders to discuss applications with the Council's Violence Against Women and Girls Service, who can provide advice and training to venues on preventing misogyny within licensed premises. In addition, License Holders are expected to take a zero-tolerance approach misogyny within their</p>

			<p>venues where this is towards customers or employees. Refusal in the first instance of acts of sexual harassment and reporting to the metropolitan police is expected. The policy states that it is expected that all Licensed venues who sell alcohol for consumption on their premises should train their staff in WAVE and adopt Ask for Angela or similar initiatives aimed at assisting vulnerability within alcohol licensed venues. Females and gay men are more prone to drinks spiking than other groups. A YouGov poll in 2022 identified that nationally 10% of females said they had their drink spiked compared to 5% of males. 48% of those aged between 18-24 said they have had a drink spiked or know someone who has. However, it is those aged between 25 and 49 who are the most likely to say they have personally had a drink spiked (11%).</p> <p>The policy makes an expectation on licence holders and applicants to have a zero-tolerance policy towards drinks spiking. This involves as a minimum ensuring all reports of spiking are acted upon and that all incidents of alleged spiking are recorded and reported to the police. Applicants for new and variations of existing licences as well as those submitting TENs are expected to work with the Metropolitan Police in order to consider actions needed to prevent drinks spiking in their venues/events.</p>
<ul style="list-style-type: none"> ▪ Age 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The policy states the types of criminal activity that may arise with licensed premises which the Licensing Authority will treat particularly seriously that relate to children and young people. This includes illegal purchase and consumption of alcohol by minors which impacts health, educational attainment, employment prospects and propensity for crime of young people; relating to grooming children; and relating to criminal activity particularly relating to gangs.</p> <p>Teenagers and young adults are more likely to use psychoactive substances such as nitrous oxide (NOx). Misuse of nitrous oxide is associated with increased antisocial behaviour including littering, noise nuisance and vandalism, all of which are detrimental to residents quality of life and feelings of safety. Use of nitrous oxide is also a health concern</p>

			and has other associated harms. The policy places an expectation on License Holders to refuse entry to any person seen use or selling NOx as a psychoactive Substance. Refusals should also be entered into License Holders refusals logs.
▪ Race	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no estimated direct or indirect disproportionate impact of these proposals to residents on the grounds of different gender identities.
▪ Religion or Philosophical belief	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no estimated direct or indirect disproportionate impact of these proposals to residents on the grounds of different gender identities
▪ Sexual Orientation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Females and gay men are more prone to drinks spiking than other groups. A YouGov poll in 2022 identified that nationally 10% of females said they had their drink spiked compared to 5% of males. 48% of those aged between 18-24 said they have had a drink spiked or know someone who has. However, it is those aged between 25 and 49 who are the most likely to say they have personally had a drink spiked (11%). The policy makes an expectation on licence holders and applicants to have a zero-tolerance policy towards drinks spiking. This involves as a minimum ensuring all reports of spiking are acted upon and that all incidents of alleged spiking are recorded and reported to the police. Applicants for new and variations of exiting licences as well as those submitting TENs are expected to work with the Metropolitan Police in order to consider actions needed to prevent drinks spiking in their venues/events.
▪ Gender re-assignment status	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no estimated direct or indirect disproportionate impact of these proposals to residents on the grounds of different gender identities
▪ People who have a Disability (physical, learning difficulties, mental)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	All business have a duty under the Equality Act 2010 to provide reasonable adjustment. The policy references that applicants and licence holder must make themselves

health and medical conditions)			familiar with the law and their responsibilities set out within the Equality Act 2010.
<ul style="list-style-type: none"> ▪ Marriage and Civil Partnerships status 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no estimated direct or indirect disproportionate impact of these proposals to residents on the grounds of different gender identities
<ul style="list-style-type: none"> ▪ People who are Pregnant and on Maternity 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no estimated direct or indirect disproportionate impact of these proposals to residents on the grounds of different gender identities
<p>You should also consider:</p> <ul style="list-style-type: none"> ▪ Parents and Carers ▪ Socio-economic status ▪ People with different Gender Identities e.g. Gender fluid, Non-binary etc. ▪ Other 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no estimated direct or indirect disproportionate impact of these proposals to residents on the grounds of different gender identities

If you have answered **Yes** to one or more of the groups of people listed above, **a full Equality Impact Analysis is required**. The only exception to this is if you can 'justify' the discrimination (Section 4).

Section 4: Justifying discrimination

Are all risks of inequalities identified capable of being justified because there is a:	
(i) <i>Genuine Reason</i> for implementation	<input type="checkbox"/>
(ii) The activity represents a <i>Proportionate Means</i> of achieving a <i>Legitimate Council Aim</i>	<input type="checkbox"/>
(iii) There is a <i>Genuine Occupational Requirement</i> for the council to implement this activity	<input type="checkbox"/>

Section 5: Conclusion

Before answering the next question, please note that there are generally only two reasons a full Equality Impact Analysis is not required. These are:

- The policy, activity or proposal is likely to have **no or minimal impact** on the groups listed in section three of this document.
- Any discrimination or disadvantage identified is **capable of being justified** for one or more of the reasons detailed in the previous section of this document.

Conclusion details

Based on your screening does a full Equality Impact Analysis need to be performed?

Yes	No
<input type="checkbox"/>	<input checked="" type="checkbox"/>

If you have answered **YES** to this question, please complete a full Equality Impact Analysis for the proposal

If you have answered **NO** to this question, please detail your reasons in the 'Comments' box below

Comments

The decision making body is recommended to:

- Agree the proposed Licensing Policy

All local authorities have to prepare and publish a Statement of Licensing Policy at least every 5 years. This policy defines how they will administer and exercise their responsibilities under the Licensing Act 2003.

The Statement of Licensing Policy is prescribed by central government in its guidance to Local Authorities, issued by the Secretary of State under section 182 of the Act. The policy must comply with this guidance. The current policy is compatible with this guidance.

This policy covers the following:

- How the Licensing Authority will use its regulatory powers in relation to applications and reviews of the activities it regulates, to the extent it is allowed by statute.
- The main licensing objectives for the authority which are set by legislative requirements.
- The Licensing Authority approach to regulation
- The scheme of delegation

Licence holder must promote the licencing objectives, and applicants must show how their application promotes these objectives in their applications.

1. the prevention of crime and disorder,
2. the prevention of public nuisance,
3. public safety,
4. the protection of children from harm.

Responsible Authorities and residents etc. can object to applications where they fail to properly promote the licensing objectives.

The new policy contains expectations on applicants and licence holders to undertake Welfare and Vulnerability Engagement Training and take zero tolerance to sexual harassment. Thus, it seeks to raise the profile of protecting vulnerable persons, and encourage a safer more inclusive licensed trade within the borough.

A statutory consultation process commenced on 19th January and 13th April 2023. The comments received have been analysed and incorporated into the policy where necessary.

The policy will be agreed by the full Council.

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