

London Borough of Tower Hamlets Statement of Community Involvement Consultation Statement January 2019

Introduction

- 1.1. This statement sets out the consultation activities that were undertaken and the responses that were received on the London Borough of Tower Hamlets' updated Statement of Community Involvement (SCI).
- 1.2. The redrafted SCI was undertaken to bring the document fully up-to-date, following a partial refresh in 2017. That refresh focused on updating the plan-making element of the SCI, in advance of the examination of the emerging Local Plan. The new SCI now updates the development management section of the document, to reflect current legislation and practice, and adds a brief section on the ways in which the Council is exploring the use of digital technology to enhance future consultations.
- 1.3. This document consists of two parts: the first describes the process of the SCI consultation, the second sets out the responses received and how the Council is responding to them.

The SCI Consultation Process

Consultation Period

- 2.1. The SCI consultation took place between 5 November 2018 and 18 January 2019 - a total of 11 weeks. This was a longer consultation for a document of this kind, as it was felt that this length of time was necessary to carefully consider the content and allow the Council to accommodate the proposed consultation events as well as account for part of the consultation stretching into the Christmas holiday period, when people may have found it more difficult to make the time to respond.
- 2.2. The consultation was originally planned to finish after 10 weeks, on 13 January 2019. However, a number of small but necessary changes to the content of the document were identified shortly after the consultation began. An updated version of the consultation document was uploaded to the Council's website and sent to the borough's libraries and Idea Stores on 9 November 2018. Although no responses had been received by this date, it was decided to extend the consultation by one week, to ensure that all consultees had the full 10 week period to consider the corrected document.

Publicity

- 2.3. The consultation document was made available for inspection at the Town Hall reception at Mulberry Place and in all of the libraries and Idea Stores in the borough. These are:
- Bow Idea Store, 1 Gladstone Place, Roman Road, E3 5ES
 - Canary Wharf Idea Store, Churchill Place, E14 5RB
 - Chrisp Street Idea Store, 1 Vesey Path, East India Dock Road, E14 6BT
 - Watney Market Idea Store, 260 Commercial Road, E1 2FB
 - Whitechapel Idea Store, 321 Whitechapel Road, E1 1BU
 - Bethnal Green Library, Cambridge Heath Road, E2 0HL
 - Cubitt Town Library, Strattondale Street, E14 3HG
 - Tower Hamlets Local History Library and Archives, 277 Bancroft Road, E1 4DQ
- 2.4. The document was also made available on the Council's website at https://www.towerhamlets.gov.uk/ignl/planning_and_building_control/consultation_and_engagement/statement_of_community_involve.aspx. This page included a description of how responses could be submitted by post or email, details of the consultation events, and an explanation about the extension of the consultation deadline.
- 2.5. An email was sent out to everyone on the plan-making team's email database, which represents those people who have confirmed that they wish to be kept up-to-date on planning policy consultations. This email explained the purpose of the consultation and how responses could be submitted, and contained details of the consultation events.
- 2.6. Further emails were sent out to all the members of the Council's Developers' Forum, and to all the members of the Tower Hamlets Housing Forum Executive. The former was very similar to the general mass email that was sent; the latter asked the members of the Executive to circulate the consultation details among their tenants, and to let the Council know if any of the tenants expressed an interest in attending the workshop event. Four responses were received to this email indicating that the details had been circulated – other recipients may have circulated the details without confirming this to the Council.

Consultation Events

- 2.7. Five consultation events were held in November 2018, four drop-in exhibition sessions at Idea Stores across the borough (set out in Par 2.8), and one workshop held at the Town Hall. The events were held at a range of times, including weekdays, weekday evenings, and weekends, and aimed to provide fair geographical representation across the whole borough. The events were all held near the beginning of the consultation period, partly because of officer availability in December, and partly because it was thought that the events would provide an introduction to the updated SCI, and recipients would then

need some time to consider what to include in a more detailed written response to the consultation.

2.8. The events were held at the following times and places:

- Drop-in: Wednesday 14 November, 5.30-7.30pm, Bow Idea Store
- Drop-in: Friday 16 November, 1.30-3.30pm, Chrisp Street Idea Store
- Drop-in: Thursday 22 November, 5.30-7.30pm, Canary Wharf Idea Store
- Drop-in: Saturday 24 November, 1.30-3.30pm, Whitechapel Idea Store
- Workshop: Thursday 29 November, 6-8pm, Tower Hamlets Town Hall

2.9. For the drop-in events, five A1 exhibition posters were developed. These briefly summarised the content of the updated SCI, and described the changes between the current SCI and the new one. They also explained how to respond to the consultation, and included the consultation questions from the SCI document. At the events, pens, paper, and post-it notes were provided for attendees to record their thoughts, and three officers were in attendance at all the events to answer questions and guide attendees through the information.

2.10. There were no attendees at any of the drop-in consultation events.

2.11. For the workshop, the intention was to hold a brief presentation on the content of the document, containing much of the same information as the exhibition posters. There would then be a question-and-answer session with the whole group of attendees. The majority of the session would then be taken up with small group work – attendees would be split into small groups on separate tables, and each group would be given one of the exhibition posters. Groups would work with a Council officer to discuss the content of the SCI in each area, to address the consultation questions, and to leave responses and ideas on post-it notes attached to the posters. These would be collected and processed by officers after the event. All attendees would also be encouraged to submit a more detailed written response during the remaining consultation period.

2.12. Potential attendees were asked to notify the Council of their intention to attend, in order to control numbers. One resident indicated an interest in attending, but decided not to upon discovering that they were due to be the only attendee. No other residents informed the Council of their intention to attend the workshop. Three officers attended the workshop session regardless, in case any attendees arrived unannounced. One attendee arrived, just over halfway through the allotted time for the workshop. The officers discussed the content of the SCI with them, as described above.

Responses to the SCI Consultation

3.1. A total of 11 responses were received to the SCI consultation.

3.2. Two of these were from local residents (including one based on notes taken from the one attendee at the workshop event). Two were internal responses

from Tower Hamlets officers. Five were from statutory organisations – the Canal and River Trust, the Marine Management Organisation, Natural England, the Port of London Authority, and Transport for London. One was from a community organisation, the Globe Town Assembly. One was from a business organisation, Canary Wharf Group.

3.3. The table below contains a summary of the comments made in the responses to the consultation – in some cases these have been paraphrased for reasons of space. The table also sets out the Council’s response to each suggestion.

Consultee Type	Comment	Response
Statutory Organisation (Canal & River Trust)	The Canal and River Trust should be added to the list of General Consultees in Appendix A.	Agreed. Proposed change: add 'The Canal and River Trust' to Appendix A, under General Consultation Bodies.
Statutory Organisation (Canal & River Trust)	We note that the Council will advise developers on potentially interested stakeholders for pre-app consultations. The Canal and River Trust should be considered a potentially interested stakeholder on applications within their notified area.	This is noted, and requires no change to the text of the SCI. The Canal and River Trust has been added to Appendix A, as a general consultation body, and would be considered as a stakeholder for relevant pre-application consultation.
Statutory Organisation (Canal & River Trust)	There should be a firm commitment to contact individuals and organisations that have stated they want to participate in Local Plan examinations – if an attempt to make contact fails, the Council should seek to reach an alternative contact or use an alternative form of communication.	The point is noted – however, contacting parties who have expressed an interest in participating in Local Plan examinations is the responsibility of the Programme Officer. The Council works with the Programme Officer where necessary to try to ensure contact is made with all interested parties, but we cannot guarantee this will always be possible, and we do rely on interested parties providing up-to-date contact information. It is felt that no change to the text of the SCI is required to address this.
Statutory Organisation (Marine Management Organisation)	The Marine Management Organisation should be added to the list of General Consultees in Appendix A.	Agreed. Proposed change: add 'Marine Management Organisation' to Appendix A, under General Consultation Bodies.
Statutory Organisation (Natural England)	Natural England is supportive of the principle of meaningful and early engagement with the general community, community organisations, and statutory organisations, both in terms of shaping policy and participating in the process	The response is noted and welcome.

	of determining planning applications.	
Statutory Organisation (Port of London Authority)	The Port of London Authority should be added to the list of General Consultees in Appendix A.	Agreed. Proposed change: add 'Port of London Authority' to Appendix A, under General Consultation Bodies.
Statutory Organisation (Port of London Authority)	With regard to the proposed changes to neighbour letters and site notices, the Port of London Authority seeks confirmation that it will still be formally consulted on all applications in close proximity to all areas which fall within its navigational jurisdiction and land ownership, which includes the River Thames and River Lea.	As a general consultation body, the Port of London Authority would still be contacted in relation to relevant planning applications – the proposed change to neighbour letters and site notices does not affect this.
Statutory Organisation (Transport for London)	TfL welcomes the opportunity for early dialogue or being informally consulted at the early stages of plan preparation and the production of other policy documents to ensure that the evidence base is adequate for any issues which are relevant to TfL.	This response is noted.
Internal (Plan-Making)	Some councils are starting to webcast council meetings and Local Plan examination hearing sessions – this could be considered in the SCI.	It is understood that the Council's Committee Services team are currently considering how to implement webcasting of committee meetings. If this technology is successfully implemented, it could potentially be expanded to future Local Plan examination hearings. Proposed change: addition of a paragraph in chapter 5 stating "We will consider the possibility of webcasting planning committee meetings and possibly local plan examination hearings".
Internal (Plan-Making)	Will consultation on modifications be listed as a discreet stage in the Local Plan consultation	This is not felt necessary, as the modification process has already been adequately covered under the adoption stage of the relevant table.

	process?	
Internal (Legal)	The current SCI does not make it clear whether translation services are available for planning application consultations. This should be clarified in the new SCI.	The new SCI makes clear, under the bullet point on 'outreach and accessibility' in chapter 2, that people who do not speak English as a first language should be considered in the preparation of any planning consultation.
Internal (Legal)	Paragraph 2 of the current SCI sets out the policies and legislation that have affected the production of the SCI. The Equalities Act 2000 is not listed here.	The relevant paragraph is no longer included in the revised SCI, as it was felt unnecessary to the purpose of the document. The Equalities Act was, however, considered in the preparation of the document, and this will be described in the Cabinet report for adopting the SCI.
Resident	Locally focused Facebook advertisements could be used to alert people to planning consultations.	Geo-located Facebook adverts may be considered suitable for some planning consultations, for example plan making and pre-application engagement – the process would be easy to implement, though careful consideration will have to be given to the best use of resources, and this could be introduced on a pilot basis initially. A reference to this will be added to the text. Proposed change: addition to paragraph 5.4 stating “We will also consider the use of geo-targeted (i.e. seen only by people located within the borough or a specific locality) online advertisements for particularly important consultations, where it is considered an effective use of limited budgets”.
Resident	More in-house digital skills would be of benefit to the Council, including possibly hiring more social media staff.	This comment is noted, and has been passed on the communications team to consider.
Resident	The consultation document is disappointing – it lacks imagination and is in the typical impenetrable style that Tower Hamlets uses for its planning communications. I was hoping to	In order to be able to focus resources on the content and consultation of the SCI, it was decided that desktop publishing would be undertaken once the document was completed. The final adopted SCI will be professionally designed, to make it more readable and accessible. Every

	see a new style adopted that would indicate the Council is raising its game.	attempt has been made to make the language of the document as accessible as possible, while accepting that certain planning terms still have to be used in a document of this kind. The language will be reviewed again before adoption to ensure it is as clear as possible and avoid jargon.
Resident	Principles – there is a need to ensure communication is proactive, extensive, user-friendly, professional, and attractive for the local population to engage with. Approaches should be borrowed from commercial marketing.	It is believed that these principles are included in chapter 2. Proactivity is covered under early engagement and outreach and accessibility; extensiveness is covered under appropriate scale and variety of methods; user-friendly is covered under clear and non-technical information and flexibility; professionalism is, we believe, covered under all the headings and expected as standard from Council officers; and attractiveness is again covered under clear and non-technical information and outreach and accessibility.
Resident	Example of good consultation – Canada Water Masterplan. They hold lots of public engagement events, have kept me regularly updated by email for years, their material is easy to understand and navigate and visually attractive. The scale and seriousness reflects the scale of the development, and this approach should have been applied to the Isle of Dogs.	The example is noted and will be circulated to senior managers within the Planning Service as a suggestion of good practice.
Resident	People who have not contributed to earlier stages of consultation should still be informed and given a chance to engage in later stages of consultation – later stages should not only be notified to those who previously responded.	The majority of consultation activities allow for this already. In the case of Local Plan examination hearings, this process is not under the Council's control – it is set out in legislation. The inspector of a Local Plan can only allow speakers at the hearings based on previously submitted responses, which are taken as the starting point for a continuing discussion. At this stage, the Programme Officer only contacts those who have previously

		submitted comments, to continue to contribute further to the process; if the Council/Inspector were to contact and allow other people who had not previously submitted comments, this may raise new issues that would not have been considered in the same way as formally submitted comments and it may unfairly raise expectations that they would have a further chance to contribute.
Resident	Social media use should be enhanced – there isn't a dedicated social media feed that I can follow, so it's hit and miss as to what is received.	The Council has some dedicated social media feeds, which have a Council-wide focus, rather than being specific to the planning service. We have considered the possibility of running social media feeds dedicated to planning matters in Tower Hamlets, but have concluded that we could achieve greater reach and a more varied range of residents through more effectively utilising the existing social media feeds to advertise planning consultations. This is discussed in chapter 5 of the SCI.
Resident	Access to local papers is limited in some parts of the borough, and notices in newspapers shouldn't be the only way the Council communicates.	Noted, and this is not the only way the Council communicates on planning issues – one of the purposes of the SCI is to set out a wider range of methods by which we will communicate.
Resident	A weekly digest of applications, broken down by area or ward would be helpful – this could also update on decisions, appeal hearings, pre-application consultations, and general planning consultations.	<p>This is a very useful point, and one the Council will explore. We will need to carefully consider the resource challenges which will have to be overcome before such a digest could be implemented, but it is believed that some form of update may be possible.</p> <p>At present it is possible to easily create a self-service report of applications received and decisions made, by week or by month for the whole authority or by ward, through the public access system at https://development.towerhamlets.gov.uk/online-applications/search.do?action=weeklyList</p>

		<p>Proposed change: addition of a paragraph to chapter 5 stating “The planning service will consider the creation of a regular planning newsletter or digest, which will provide summarised information about major planning applications and decisions, appeal hearings, pre-application consultations, and planning policy consultations. Careful consideration will need to be given to how this is implemented, to avoid consultation fatigue among recipients”.</p>
<p>Resident</p>	<p>The Council’s website is atrocious – difficult to find out when an application is submitted, and then difficult to navigate the many documents included with an application. A regularly updated map showing the location of all development would be helpful. The search mechanism needs to be improved. The mechanism for signing up for updates needs to be improved. Some of the resources do not open on tablet computers. It is difficult to know what is currently going on with an application in terms of key dates. In my experience, people often do not submit online comments because of the problems with this system.</p>	<p>The problems that some residents have with the planning register website are noted. . The Council is in frequent contact with the external provider to ensure effectiveness. This provider makes regular updates to the system, which may improve functionality.</p> <p>These comments have been passed on to the team that deals with the public access system on the Council’s website, and they will consider whether to pass on further suggestions to the system provider.</p> <p>In particular, we are considering possible ways of improving the indexing of documents on large applications, which should make navigating the documents simpler.</p> <p>In terms of documents not opening on tablet computers – all documents are made available in pdf format, which should work on all electronic devices. If a file will not open at all, please contact the Council, as there may be a problem with the file.</p> <p>In terms of search functions, the weekly and monthly search functions can be useful, and can be limited to individual wards – this can be found</p>

		<p>at - https://development.towerhamlets.gov.uk/online-applications/search.do?action=weeklyList</p> <p>An interactive map of planning applications is already available at https://www.towerhamlets.gov.uk/ignl/planning_and_building_control/planning_applications/search_and_comment_planning_applications.aspx This map is updated daily.</p>
Resident	<p>Neighbour letters do not work when it comes to keeping the wider community informed, because they only go to very near neighbours. I am interested in development all along Westferry Road because of potential impact on traffic and public transport, but would only be notified about developments right next to me.</p>	<p>Neighbour letters are used as a primary means of notifying residents on planning applications along with site notices, press notices and website information. The Council's current and proposed SCI go beyond the statutory minimum requirement to notify adjoining occupiers by adopting wider consultation boundaries.</p> <p>While the point about areas of local interest is noted, a balance needs to be struck, particularly as the Council deals with around 3,000 applications of all types each year.</p> <p>For wider areas of interest, residents can use the search function on the public access system to focus in on types of application, by ward and within date parameters. Searches can be saved to make repeat searches straightforward.</p>
Resident	<p>Consultation needs to discuss the demolition and construction phases as well as the final development, as these phases can have a large impact on daily life - the public should be consulted on this aspect.</p>	<p>The discussion of demolition and construction phases is not excluded from current consultation practice, and the Local Plan contains policies which aim to reduce the impact of these phases. As the SCI covers the process of consultations rather than prescribing the exact content of them, it would be inappropriate to alter the text to reference this.</p>
Resident	<p>The Council's current policy about what I will be informed of after registering interest in a</p>	<p>If you have submitted comments on a pre-application proposal, application or plan, you will be kept updated. The wording of Council</p>

	development is unfathomable, and I don't understand if I will be kept informed or not after submitting comments.	planning documents is regularly reviewed to try to ensure they are as clear and accessible as possible. Residents can view applications and register to receive notifications if the plans are amended or a decision is made.
Resident	The Council could improve communication about the stage a proposal or plan has reached, and summarise the responses the Council has received from interested parties and local people.	<p>The Council published consultation statements (such as this one) after all planning policy consultations, summarising the consultation process and responses received. Comments made on planning applications are publically viewable, and summarised in committee reports. Comments at pre-app consultations should be reflected in the planning application, usually in the Design & Access statement, although a more explicit reference to the expectation that this will be done could be included in the SCI text.</p> <p>Proposed change: addition of new paragraph in Pre-Application Advice and Consultation section.</p> <p>“Developers should clearly explain how comments received during a pre-application consultation process have been taken into account and influenced the submitted application. This can be done in a number of ways, but is often included in the Design & Access Statement, Consultation Report or Planning Statement.”</p>
Resident	Residents' Associations and Right to Manage groups from private leasehold estates should be given the same status in consultations as Tenants' Associations on social housing. They should be able to opt in to become a formal body to be consulted.	Tenants' Associations do not have any formal or special status in consultations. Both Residents' and Tenants' Associations, if they wish to be included in planning consultations, should ask to be placed on the planning policy consultation database, or should use the search tools available on the online planning register to keep track of planning applications coming forward in their area.
Resident	The council could do a better job of clearly	The SCI is aiming to do this. The language of the SCI will be reviewed

	explaining the different stages of consultation and what can and can't be consulted on at each stage – using less legalese.	before adoption to make it as accessible as possible. Please provide any specific suggestions should you have them.
Resident	Almost all of the Council's communication on planning is in dry, legalistic, impenetrable language – should use clear, plain English.	The use of clear English is a principle of the SCI. The wording of planning documents published by the Council is regularly reviewed to try to make them as accessible as possible. However, in some cases, the use of technical terms is necessary for statutory reasons.
Resident	Unclear about the role of pre-app consultation, and why it is the best time to get involved – I go to lots of them, but never know if my comments are taken into account, and never get informed when the application is then submitted. Developers do a very poor job of advertising these pre-app consultations, and their behaviour varies widely – from listening, to being dismissive.	As the Council cannot make pre-application consultation mandatory, much of the responsibility here is on the developers themselves. The new SCI aims to provide guidance as to how a pre-consultation application can be improved. Pre-application consultations could also be included in the proposed newsletter, if this is implemented. Proposed change: add the word 'meaningful to alter paragraph 4.9 to read "...the Council strongly encourages meaningful engagement...'
Resident	Tower Hamlets should encourage planning inspectors to provide a slot in appeal hearings for local residents to speak.	Time for residents to speak can already be allotted during hearings, but only at the Inspector's discretion – the Council has no additional power to require this, but is happy for residents to have this time to speak if the Inspector allows it.
Resident	The accessibility of planning consultations needs to be improved. Parts of the borough, such as the west of the Isle of Dogs, are not well served by libraries, so making documents available in libraries should be the bare minimum. Consultation events need to take place in the community, at a range of times and locations.	This is a principle of the new SCI.

Resident	3D map images should be made available to help people understand the size and scale of developments.	<p>The Council is currently exploring the use of 3D imaging in planning applications.</p> <p>Proposed change: addition of a paragraph to chapter 5 stating “We are currently exploring the use of 3D imaging in planning applications to demonstrate the height, scale and massing of applications in context, and will consider how best to use this technology when engaging with the public”.</p>
Resident	The proposed weekly digest and the improved website should include more information on listed buildings at risk and how the Council is managing the risk.	This is noted, and information on this issue could potentially be included in the proposed newsletter or digest, if it is implemented. In addition, more information on heritage at risk can be found at https://historicengland.org.uk/advice/heritage-at-risk/ .
Resident	Big developers should each be asked to make a small contribution of, for example, £5,000 to support improved public consultation. This will benefit developers because better coordination will save everyone money, result in a better built environment, and make residents less upset with the Council and developers.	Under current legislation, the Council has no power to require this from developers.
Community organisation (Globe Town Assembly)	We support the commitment to the four priority outcomes in paragraph 2.1; the identification that pre-app stage is the best time to get involved; the encouragement of developers to engage in pre-app consultation; and the use of QR codes on site notices and neighbour letters.	This is noted and the support is welcome.
Community organisation	We recognise the Council has limited resources and therefore understand the need to reduce	This is noted.

(Globe Town Assembly)	consultation boundaries.	
Community organisation (Globe Town Assembly)	The planning portal tool would be more useful if it were possible to request automatic notification of planning applications within a specific area, rather than having to search manually. This will be particularly important if consultation boundaries are to be reduced, and improvements to the website should be made before the boundaries are reduced.	<p>It is possible to use the planning public access system to save a search with particular location, application type or date criteria, which makes re-running the search straightforward, or to use the weekly and monthly search function within a particular ward at https://development.towerhamlets.gov.uk/online-applications/search.do?action=weeklyList. In addition, an interactive map of planning applications can be found at https://www.towerhamlets.gov.uk/lgnl/planning_and_building_control/planning_applications/search_and_comment_planning_applications.aspx.</p> <p>The public access system has a help page, however there is an opportunity to make this information more accessible and prominent on the planning website.</p>
Community organisation (Globe Town Assembly)	The suggestion of a fortnightly email summarising key developments in an area would be of interest – community organisations such as ourselves could then share these with our members.	<p>The Council will explore this option in more detail. We will need to carefully consider the resource challenges which will have to be overcome before such a digest could be implemented, but it is believed that some form of update may be possible.</p> <p>Proposed change: addition of a paragraph to chapter 5 stating “The planning service will consider the creation of a regular planning newsletter or digest, which will provide summarised information about major planning applications and decisions, appeal hearings, pre-application consultations, and planning policy consultations. Careful consideration will need to be given to how this is implemented, to avoid consultation fatigue among recipients”.</p>

<p>Community organisation (Globe Town Assembly)</p>	<p>The Globe Town Assembly would like to be added to the planning policy database and would like to be listed as a General Consultation Body.</p>	<p>The Assembly has been added to the planning policy database. Rather than refer to the Assembly by name in Appendix A (as the list would become very long if all relevant community groups were listed by name), a change will be made to emphasise that other community groups can fall under the relevant bullet point.</p> <p>Proposed change: add “other community groups that express interest” to the penultimate bullet point under ‘General Consultation Bodies’.</p>
<p>Business organisation (Canary Wharf Group)</p>	<p>We endorse the Council’s commitment to engaging with local communities, organisations and businesses. Canary Wharf Group shares this aim. We are in support of the Council’s consultation principles. We welcome the Council’s ambition to increase the use of digital technologies. On the whole, Canary Wharf Group is supportive of the revised SCI.</p>	<p>This support is noted and welcomed.</p>