

Budget Savings Proposals
Full Equality Analysis

Section 1: General Information

1a) Name of the savings proposal

Statement of Community Involvement Review

1b) Service area

Planning and Building Control

1c) Service manager

Owen Whalley

1d) Name and role of the officer/s completing the analysis

David Williams, Deputy Service Head Planning and Building Control

Michael Bell, Strategic Planning Manager

Pete Smith, Development Control Manager

Helen Smith, Community Planning and Liaison Officer

Section 2: Information about changes to services

2a) In brief please explain the savings proposals and the reasons for this change

The Statement of Community Involvement (SCI) is a statement of a local authority's policy for involving the community in preparing and revising local development documents (local plans) and for consulting on planning applications. The purpose of the SCI is to introduce transparency and consistency into the planning consultation process and ensure that the local community understands how they can participate and how the council will engage and involve them in the planning process.

The Council needs to bring its SCI up-to-date. The proposed changes ensure that the Council is consulting on planning applications in the most effective way, in particular using new technology to do this. It is the intention to reduce consultation to the statutory requirements, complemented by the use of the Council's My Tower Hamlets portal, through which customers will be able to tailor their area of planning interest and receive automated email updates when applications are received. This will provide a more efficient and targeted approach. The proposal also reduces the cost of public consultation through **changes** in the SCI relating to **how** the Council consults on planning applications. Currently the Council exceeds its statutory requirements and these proposed changes will bring it in line with what is required by law. Total projected saving is £75,000 over three years.

The proposed savings will arise from the changes to how the Council consults on the planning application process. These include:

- Not advising consultees in writing of the outcome of an application. Instead: The initial consultation letter to advise third parties would refer to the website for information and encourage people to register on My Tower Hamlets for alerts;
- Reducing extent of the consultation boundary for consultation letters. Instead: Limit the extent of the boundary on consultation on minor applications and review the boundary on majors;
- Not acknowledging objections. Instead: Uploading any consultation letters received on to the website;
- Reducing reliance on site notices. Instead: Reduce the number to the statutory level;
- Reduce consultation on Tree Applications in conservation areas. Instead: Just do site notices rather than all forms of consultation including newspaper adverts and neighbour consultation;
- Reduce the scope of re-consultation exercises. Instead: Only re-consulting those who made comments in respect of the initial consultation letter;
- Reduce weekly reports on applications received. Instead: Use My Tower Hamlets as a mechanism for automatic updates on applications received.

Alongside the amendments to the SCI the Council is bringing in a new Planning Consultation System, which will detail much more

comprehensively all comments from the community made on planning and development matters, this will really help identify if issues do arise in the future and improve the monitoring of who engages with the planning process.

It is a statutory duty for the local Council to consult on all planning applications and the Council will continue to do so.

2b) What are the equality implications of your proposal?

All savings proposals have been screened for equalities relevance using the test of relevance questionnaire attached (Appendix A).

In relation to the test of relevance questions we know that this will change/alter access to the service. It is the intention to reduce consultation to the statutory requirements, complemented by the use of the Council's My Tower Hamlets portal, through which customers will be able to tailor their area of planning interest and receive automated email updates when applications are received. This will provide a more efficient and targeted approach. It is acknowledged that not all residents have access to the internet in their own homes and may be unaware of application when previously they would have been informed. Access to the planning process remains open to all and will not be charged for as part of this process. The proposals will however put the onus more on an individual to choose if they wish to engage and how. Although not all residents may have the internet in their own homes, Idea Stores and libraries offer free access to computers and the internet at the 9 locations across the Borough and are accessible to all.

The Channel Strategy identified three categories of resident in the borough and highlighted their approach to internet use. It identified that the High Deprivation Group (54% of residents) preferred to access Council Services through One Stop Shops rather than accessing the internet. This would suggest that an increase in use of online consultation methods such as My Tower Hamlets may not be adopted by lower socio economic groups.

In the London School of Economics report, *The Emergence of a Digital Underclass: Digital Policies in the UK and Evidence for Inclusion*, the above issues were highlighted as being a national problem. It highlights that a digital underclass is emerging in Britain, a group of people who are increasingly more disadvantaged in their ability to use the internet and other Information and Communication Technologies. It states that as the government plans to make public services 'digital by default' these individuals will be unable to access them. The report focuses on issues around access but also on digital literacy, motivation and awareness as well as on broad engagement with the variety of opportunities available online. These issues relate directly to many of the issues raised regarding a greater shift towards online consultation. To mitigate against adverse impact the issue of access needs to be addressed in conjunction with increasing motivation to engage with online consultation and increasing the digital literacy of lower

socio economic groups.

As a prelude to pioneering a web based approach to their services, research work was undertaken by the Adults, Health and Wellbeing Directorate looking at profiling the average internet users. Results indicated that there are no large divergences between genders accessing the Tower Hamlets website. It identified that there is untapped demand for the internet especially in the non-deprived sectors of the community. The most important determinant when considering online accessibility was household income. Monetary income is a significant barrier for accessing online resources for poorer households and this is especially true for Tower Hamlets. It was established that there is a reasonably high willingness to use the internet and this is highest amongst the prosperous and modest means segments. However, even the deprived segments have nearly a 50% willingness to conduct affairs on the internet with the council and this was a higher percentage than by post across all segments. It also appeared that customers across the board would be more willing to use email as an alternative to post. The access to the internet is fairly uniform across the different age groups with all groups from 20-52 having access levels around 75%. This falls quite quickly in the older age groups with 54% of the 60-64 years olds and 77% of the over 65s with no access.

Planning and Building Control will continue to achieve the statutory requirements for the distribution of letters to neighbouring properties, site notices and advertising, where appropriate, in East End Life.

Section 3: Equality Impact Assessment

With reference to the analysis above, for each of the equality strands in the table below please record and evidence your conclusions around equality impact in relation to the savings proposal.

Please list in the table below any adverse impact identified and, where appropriate, steps that could be taken to mitigate this impact. This analysis will inform the decision making process

If you consider it likely that your proposal will have an adverse impact on a particular group (s) and you cannot identify steps which would mitigate or reduce this impact, you will need to demonstrate that you have considered at least one alternative way of delivering the change which has less of an adverse impact.

If an adverse impact cannot be mitigated please describe an alternative option, its costs and the equality impact.

Target Groups What impact will the proposal have on specific groups of service users and staff?	Impact – Positive or Adverse	Reason(s) <ul style="list-style-type: none"> • Please add a narrative to justify your claims around impacts and, • Please describe the analysis and interpretation of evidence to support your conclusion as this will inform members decision making
Race	Potential impact	<p>Access to the planning process remains open to all and will not be charged for as part of this process. The proposals will however put the onus more on an individual to choose if they wish to engage and how. The Council is duty bound to consult on all planning applications and will continue to do so. There is nothing specific within the amendments that will impact on a specific ethnic group.</p> <p>There is an intention to use the Council’s My Tower Hamlets portal, through which customers will be able to tailor their area of planning interest and receive automated email updates when applications are received, therefore providing a more efficient and targeted approach. Those people who sign up to this service will be asked to leave their equalities information, thereby helping to identify who is or is not using the service. Although not all residents may have the internet in their own homes, Idea Stores and libraries offer free access to computers and the internet at the 9 locations across the Borough and are accessible to all.</p> <p>The availability of mobile broadband services also means that ownership of a landline is no longer a pre-requisite for many for a broadband connection. Ofcom Communications Market Report: UK August 2011 reports that the proportion of adults who personally own/use a mobile phone is 91% (Q1 2011), with 15% of adults living in a mobile only home. There has been a huge growth in smartphone take-up and use in the past 12 months. Almost a third (30%) of mobile phone owners now have a smartphone, and take up has grown very quickly, with 59% having purchased their smartphone in the past year. 28% of UK adults claim to access internet services on their mobile phone and through using this increasing popular form of technology to engage with people it will be possible to reach people through their preferred means.</p> <p>The Equalities Monitoring form will be used at events to give a better understanding of who attends these events</p>

		<p>and how we need to tailor our engagement activities to ensure that everyone, including those in the protected characteristic groups, has the opportunity to get involved.</p> <p>The changes that are proposed will form part of a communications campaign which will include features in the BME press to help inform all parts of the Tower Hamlets community, and in particular new communities. Developers will continue to be encouraged to offer translation and interpretation services at their consultation events and in their consultation materials to help with understanding of proposals on major applications.</p>
Disability	Neutral	<p>Access to the planning process remains open to all and will not be charged for as part of this process. The proposals will however put the onus more on an individual to choose if they wish to engage and how. The Council is duty bound to consult on all planning applications and will continue to do so. There is nothing specific within the amendments that will impact on disabled people.</p> <p>There is an intention to use the Council's My Tower Hamlets, through which customers will be able to tailor their area of planning interest and receive automated email updates when applications are received. Those people who sign up to this service will be asked to leave their equalities information, thereby helping to identify who is or is not using the service. Although not all residents may have the internet in their own homes, Idea Stores and libraries offer free access to computers and the internet at the 9 locations across the Borough. All Idea Stores are accessible and a range of equipment to support disabled people is available in Idea Stores.</p> <p>Tailored consultation is undertaken when required on planning applications to ensure that the whole Tower Hamlets community has the opportunity to have their views heard. We will seek to consult external and independent input from specific groups such as the Disability Coalition, the Council's Access Officer, Tower Hamlets Homes Residents' Panel and Special interest groups will also be approached where appropriate. We will continue to ensure that all events are accessible.</p> <p>The Equalities Monitoring form will be used at events to give a better understanding of who attends these events and how we need to tailor our engagement activities to ensure that everyone, including those in the protected characteristic groups, has the opportunity to get involved.</p>
Gender	Neutral	<p>Access to the planning process remains open to all and will not be charged for as part of this process. The proposals will however put the onus more on an individual to choose if they wish to engage and how. The</p>

		<p>Council is duty bound to consult on all planning applications and will continue to do so. There is nothing specific within the amendments that will impact on a specific gender.</p> <p>There is an intention to use the Council's My Tower Hamlets, through which customers will be able to tailor their area of planning interest and receive automated email updates when applications are received. Those people who sign up to this service will be asked to leave their equalities information, thereby helping to identify who is or is not using the service. Although not all residents may have the internet in their own homes, Idea Stores and libraries offer free access to computers and the internet at the 9 locations across the Borough and are accessible to all irrespective of gender.</p> <p>The Equalities Monitoring form will be used at events to give a better understanding of who attends these events and how we need to tailor our engagement activities to ensure that everyone, including those in the protected characteristic groups, has the opportunity to get involved.</p>
Gender Reassignment	Neutral	<p>Access to the planning process remains open to all and will not be charged for as part of this process. The proposals will however put the onus more on an individual to choose if they wish to engage and how. The Council is duty bound to consult on all planning applications and will continue to do so. There is nothing specific within the amendments that will impact on people with gender re-assignment.</p> <p>There is an intention to use the Council's My Tower Hamlets, through which customers will be able to tailor their area of planning interest and receive automated email updates when applications are received. Those people who sign up to this service will be asked to leave their equalities information, thereby helping to identify who is or is not using the service. Although not all residents may have the internet in their own homes, Idea Stores and libraries offer free access to computers and the internet at the 9 locations across the Borough and are accessible to all.</p> <p>Tailored consultation is undertaken when required on planning applications to ensure that the whole Tower Hamlets community has the opportunity to have their views heard, with forums such as the LGBT Staff Forums and Rainbow Tower Hamlets approached for their input and guidance where appropriate. Tower Hamlets Homes Residents' Panel and Special interest groups, including the Youth Forum, BME Women's Focus Group, BME Men's Focus Group will also be approached where appropriate</p>

		<p>The Equalities Monitoring form will be used at events to give a better understanding of who attends these events and how we need to tailor our engagement activities to ensure that everyone, including those in the protected characteristic groups, has the opportunity to get involved.</p>
Sexual Orientation	Neutral	<p>Access to the planning process remains open to all and will not be charged for as part of this process. The proposals will however put the onus more on an individual to choose if they wish to engage and how. The Council is duty bound to consult on all planning applications and will continue to do so. There is nothing specific within the amendments that will impact on sexual orientation.</p> <p>There is an intention to use the Council's My Tower Hamlets, through which customers will be able to tailor their area of planning interest and receive automated email updates when applications are received. Those people who sign up to this service will be asked to leave their equalities information, thereby helping to identify who is or is not using the service. Although not all residents may have the internet in their own homes, Idea Stores and libraries offer free access to computers and the internet at the 9 locations across the Borough and are accessible to all irrespective of sexual orientation.</p> <p>Tailored consultation is undertaken when required on planning applications to ensure that the whole Tower Hamlets community has the opportunity to have their views heard, with forums such as the LGBT Staff Forums and Rainbow Tower Hamlets approached for their input and guidance where appropriate. Targeted consultation with Tower Hamlets Homes Residents' Panel and Special interest groups, including the Youth Forum, BME Women's Focus Group, BME Men's Focus Group will also be undertaken where appropriate</p> <p>The Equalities Monitoring form will be used at events to give a better understanding of who attends these events and how we need to tailor our engagement activities to ensure that everyone, including those in the protected characteristic groups, has the opportunity to get involved.</p>
Religion or Belief	Neutral	<p>Access to the planning process remains open to all and will not be charged for as part of this process. The proposals will however put the onus more on an individual to choose if they wish to engage and how. The Council is duty bound to consult on all planning applications and will continue to do so. There is nothing specific within the amendments that will impact on a specific religion or belief.</p> <p>There is an intention to use the Council's My Tower Hamlets, through which customers will be able to tailor their</p>

		<p>area of planning interest and receive automated email updates when applications are received. Those people who sign up to this service will be asked to leave their equalities information, thereby helping to identify who is or is not using the service. Although not all residents may have the internet in their own homes, Idea Stores and libraries offer free access to computers and the internet at the 9 locations across the Borough and are accessible to all irrespective of religion or belief. Idea Stores are inclusive of the whole community and the Idea Store Visitor Usage Survey 2009 identified that 42% of users are Muslim, 31% Christian, 20% of no religion and other religions make up the remaining users.</p> <p>Encouraging communities to engage with technology can mean we can make sure notifications get to the people who have requested information and we will have contact details so matters that are important to specific sections of the community in an area can be made available as directly as possible. The Council wishes to engage the whole of the community including groups that maybe 'harder to reach'. One of the best ways to do this is to develop relationships rather than just issue broad letters and notices and hope people respond.</p> <p>Tailored consultation is undertaken when required on applications to ensure that the whole Tower Hamlets community has the opportunity to have their views heard, with forums such as the Interfaith Forum engaged. Targeted consultation with Tower Hamlets Homes Residents' Panel and Special interest groups, including the Youth Forum, BME Women's Focus Group, BME Men's Focus Group will also be undertaken where appropriate</p> <p>The Equalities Monitoring form will be used at events to give a better understanding of who attends these events and how we need to tailor our engagement activities to ensure that everyone, including those in the protected characteristic groups, has the opportunity to get involved.</p>
Age	Potential Impact	<p>Access to the planning process remains open to all and will not be charged for as part of this process. The proposals will however put the onus more on an individual to choose if they wish to engage and how. The Council is duty bound to consult on all planning applications and will continue to do so. There is nothing specific within the amendments that will have age implications.</p> <p>It is recognised that older people tend to have less access to the internet than other age groups (as identified through the research outlined in 2b), although Planning and Building Control will continue to achieve the statutory requirements for the distribution of letters to neighbouring properties, site notices and advertising, where appropriate, in East End Life. There is an intention to use the Council's My Tower Hamlets, through which</p>

		<p>customers will be able to tailor their area of planning interest and receive automated email updates when applications are received. Those people who sign up to this service will be asked to leave their equalities information, thereby helping to identify who is or is not using the service. Although not all residents may have the internet in their own homes, Idea Stores and libraries offer free access to computers and the internet at the 9 locations across the Borough and are accessible to all irrespective of age. 'Idea Stores visitor usage 2009-10' identified that 8% of people over the age of 65 attend Idea Stores and they provide dedicated pages of the website for 'silver surfers'. A number of free internet classes are offered at Libraries/Idea Stores through which those who have limited or no skills can improve.</p> <p>Almost a third (30%) mobile phone owners now have a smartphone, however younger people are much more likely than older people to have access to the internet. Smartphone ownership is higher among those aged 16-34 and so it is easier for younger age groups to be reached where they are and can engage in a range of ways. Many people access the internet where they work and so have the opportunity to be involved, regardless of whether they have internet access at home.</p> <p>Tailored consultation is undertaken when required on applications to ensure that the whole Tower Hamlets community has the opportunity to have their views heard, with local community groups specifically for older people or younger age groups through schools and the Young Mayor's programme where appropriate.</p> <p>The Equalities Monitoring form will be used at events to give a better understanding of who attends these events and how we need to tailor our engagement activities to ensure that everyone, including those in the protected characteristic groups, has the opportunity to get involved.</p>
Socio-economic	Potential Impact	<p>Access to the planning process remains open to all and will not be charged for as part of this process. The proposals will however put the onus more on an individual to choose if they wish to engage and how. The Council is also duty bound to consult on all planning applications and will continue to do so. However, to enable the service to take advantage of technology improvements and new developments corporately and based on returns to most consultation, it is proposed to amend how we engage and consult the community. The new arrangements will involve more use of technology and it is recognised that some sections of the community may have difficulty in accessing a PC or cannot afford to have one in their own home.</p> <p>There is an intention to use the Council's My Tower Hamlets, through which customers will be able to tailor their</p>

		<p>area of planning interest and receive automated email updates when applications are received. Those people who sign up to this service will be asked to leave their equalities information, thereby helping to identify who is or is not using the service. According to Ofcoms statistics over half (55%) of the lower end (C2D2) of the socio economic scale in London have internet connection at home. Although not all residents will have the internet in their own homes, Idea Stores and libraries offer free access to computers and the internet at the 9 locations across the Borough and are accessible to all irrespective of the users socio-economic status.</p> <p>Idea Store Visitor Usage Survey 2009 show that a broad range of users from a range of socio-economic backgrounds already make use of the Idea Stores. Users include 27% in full time employment, 16% unemployed, 18% full time education and 7% looking after the home.</p> <p>Targeted consultation with Tower Hamlets Homes Residents' Panel and Special interest groups, including the Youth Forum, BME Women's Focus Group, BME Men's Focus Group will be undertaken where appropriate</p> <p>The Equalities Monitoring form will be used at events to give a better understanding of who attends these events and how we need to tailor our engagement activities to ensure that everyone, including those in the protected characteristic groups, has the opportunity to get involved.</p>
Marriage and Civil Partnerships.	Neutral	
Pregnancy and Maternity	Neutral	

Section 4: Equality Impact Assessment Action Plan

Please list in the table below any adverse impact identified and, where appropriate, steps that could be taken to mitigate this impact.

If you consider it likely that your proposal will have an adverse impact on a particular group (s) and you cannot identify steps which would mitigate or reduce this impact, you will need to demonstrate that you have considered at least one alternative way of delivering the change which has less of an adverse impact.

Adverse impact	Please describe the actions that will be taken to mitigate this impact
People do not have access to the internet at home, work or on their mobile <ul style="list-style-type: none"> - Socio-Economic - Age (older people) - Race 	A communications campaign will communicate to the public the new ways to get involved in the planning process. A news article in East End Life is proposed, with distribution to local community language press. The Council's website will be update to tell people how to get involved. Improved communication of the ways to get involved will be given at Idea Stores, Council Offices and One Stop Shop, leading to a more informed public.
People do not want to use the online option and therefore will not be informed <ul style="list-style-type: none"> - Age (older people) 	We will provide the Idea Stores with a weekly hardcopy of planning applications which people can use as an alternative to the online solution should they prefer.

If an adverse impact cannot be mitigated please describe an alternative option, its costs and the equality impact.

Section 5: Future Review and Monitoring

The actions below outline how it is intended to monitor and review the actual equality impact the changes have made, particularly in relation to the potential adverse impacts outlined in Section 4.

The EqIA re-enforces the need to utilise the proposed Planning Consultation System and will mean that we will need to review the service and the SCI in the light of a regular review of the information held in the database.

Work with the Corporate Equalities team will be undertaken to establish the most appropriate ways to equalities monitor those who submit representations on planning applications. The Equalities Monitoring form will be used at events to give a better understanding of who attends these events and how we need to tailor our engagement activities to ensure that everyone has the opportunity to get involved.

It should be noted that going forward the new Planning Consultation System will greatly improve our knowledge about who accesses the service. Through the registration process it will be possible to request equalities monitoring information.

The monitoring described above will be used to review this EA after a year of implementing these changes. It is proposed that the review and findings will also form part of the wider Local Development Framework Annual Monitoring Report.