

Tower Hamlets Council Town Hall 160 Whitechapel Road London E1 1BJ

RE: 15 Chandler Street, Wapping E1W 2QL – Proposal for a 'Culturally Sensitive Substance Misuse recovery centre'/'drug rehabilitation service' on the 1st, 2nd and 3rd floors.

15th September 2024

Dear Sir/Madam,

We write to you in relation to the above Tower Hamlets Council proposal.

Proposed location:

This facility would be located within close proximity to local businesses, service providers and residential units

Step by Step nursery Within the same building – 15 Chandler Street E1W. A private business that accommodates a maximum of 52 children aged from 0 – 4 years old.

A children's playground directly opposite the building. (Approx. 14 meters away).

Reardon House, Reardon Street E1W. 69 residential flats with significant young family occupancy. (Approx 34 meters away).

Lowder House, Wapping Lane E1W. 25 Residential flats with significant young family occupancy. (Approx 74 meters away).

Altab Ali House, 11 Reardon Street E1W. 18 Residential flats with significant young family occupancy. (Approx 150 meters away).

Flats above The Wapping Practice, Wapping Lane. 14 Residential flats with significant young family occupancy. (Approx. 28, 74 & 86 meters away).

JRS, Jusuit refugee service located at 2 Chandler Street E1W 2QT, (Approx. 21 meters away).

Puddle Jumpers Nursery located at St Peters Centre, Reardon Street E1W 2OH, (Approx. 79 meters away).

The Wapping Group Practice located 22 Wapping Lane, E1W 2RL, (Approx. 82 meters away).

St Peters Church, Wapping Lane E1W 2RW, (approx. 69 meters away).

Pollyannas Training Theatre, Raines House, Raines street E1W 3QQ, (Approx. 122 meters away). (Map attached).

The proposed location is significantly close to other local businesses, service providers and residential units. Whilst we understand the need for such addiction/recovery provisions within the borough and agree we need them as part of a holistic approach to handing drug addiction we would suggest that such provisions should be located centrally within a borough where they are most accessible for the users/clients of the service. Wapping sits on the fringes of the borough with limited public transport by comparison to other Wards within the borough.

Council Communication:

The council has delivered 2 notifications -

- 1) A 1 page letter on the 17th July 2024 was issued by the council to supposedly 150 residents within Reardon House, Reardon Street E1W. This letter contained an ambiguous bullet point list of the services it intending to deliver. With a foot note asking 'if you would like' to provide feedback within 5 working days. (LBTH Letter 17 7 24 attached).
- 2) An informal meeting by 2 council officials on the 17th July 2024 with staff of the Step by Step nursery on the ground floor of the 15 Chandler Street E1W.

Regarding point -

- 1) Typically, consultation periods are set at 21 days, not 5 days. Reardon House has a significant Bengali population. The letter was not copied into the Bengali language.
- 2) The meeting was ambiguous about what service the council intended to offer to the first second and third floors of the building. Nor was the meeting arranged with senior managers of the business.

On the 8th and 12th of September 2024 the St Katharine's and Wapping Safer Neighbourhood Ward Panel wrote to the council with the following request -

'Could you advise on the decision-making process/protocol please when choosing a location for such a service?

As example - Presumably you have data relating to the numbers and locations of clients that require this service. Locations of existing facilities offering these services? What considerations are taken into account for other community facilities within the immediate location.

I have attached a letter which I understand was hand delivered to 150 local residents. It asks for feedback (if you would like) within 5 working days of the date of the letter, 17th July 2024. Could you please confirm if this has fulfilled all/any of the council's statutory requirements. A copy of those statutory requirements would also be useful.'

No response at date of this letter.

Statutory/non statutory consultation process:

'Best Value standards and intervention; a statutory guide for best value authorities';

4. Defining best value - 7. Partnership and community engagement

Description

Driving local economic growth, promoting social cohesion and pride in place is increasingly dependent on the effectiveness of partnerships and collaborative working arrangements with a range of local stakeholders and service users.

Authorities should have a clear understanding of and focus on the benefits that can be gained by effective collaborative working with local partners and community engagement. Partnerships can maximise opportunities for sharing resources, achieving outcomes and creating a more joined-up offer that meets the needs of residents and local service users. Stronger and more effective partnerships can also lead to better community engagement, for example working through partners to engage more effectively.

Appropriate governance structures should be in place to oversee these arrangements, and the process of consultation and engagement should be inclusive, open and fair. There are statutory requirements on local authorities to engage with Integrated Care Partnerships, Integrated Care Boards, Community Safety Partnerships, safeguarding adults and children's boards, Youth Offending Management Boards and many others. There are also <u>statutory best value requirements</u> around consultation and on considering the social

value of services when reviewing service provision. An inclusive approach that accepts challenge is an indicator of a confident organisation.

The council has failed to deliver in this respect.

Revised best value stator guidance - 3.

To achieve the right balance – and before deciding how to fulfil their Best Value Duty – authorities are under a Duty to Consult7 representatives of a wide range of local persons; **this is not optional.** Authorities must consult representatives of council tax payers, those who use or are likely to use services provided by the authority, and those appearing to the authority to have an interest in any area within which the authority carries out functions. Authorities should include local voluntary and community organisations and small businesses in such consultation. This should apply at all stages of the commissioning cycle, including when considering the decommissioning of services. In the interests of economy and efficiency, it is not necessary for authorities to undertake lifestyle or diversity questionnaires of suppliers or residents.

The council has failed to deliver in this respect.

The council has failed to adhere/follow both statutory and non-statutory consultation processes.

Recommendation:

The council has failed to consult with residents, business, stakeholders and local voluntary/community organizations. The council has failed to consider existing businesses, services and facilities within the immediate location. There has been no study or risk assessment of the impact of the proposed facility within the immediate or reaching environment.

It has without prior consultation submitted a planning application, (PA/24/01545/NC) for the change of use to the 1^{st,} 2nd and 3rd floors of 15 Chandler Street and material building alterations to accommodate a separate entrance.

We would recommend that the planning application is withdrawn immediately until a full and transparent consultation process has been launched.

Please acknowledge receipt of this email within 5 working days.

Matt Melbye Chair

St Katharine's and Wapping Safer Neighbourhood Ward Panel

(a non-political Group of Volunteers, working with the Police, Local Authority and Residents to make the Ward a Safer Place in which to live and work)

www.skw-wardpanel.org

References -

https://www.gov.uk/government/publications/best-value-standards-and-intervention-a-statutory-guide-for-best-value-authorities/best-value-standards-and-intervention-a-statutory-guide-for-best-value-authorities

https://assets.publishing.service.gov.uk/media/663a3a5374933dccbbb6c335/Revised_Best_Value_Statutory_Guidance_final.pdf