COMEDIA

London Borough of Tower Hamlets:

Intercultural Consultation for a Global City District

April 2006

Contents

1.0 Introduction: The Intercultural City and The Planning Challenge

This report explores how processes of planning consultation in a global city district can be realigned to ensure meaningful connection is made with the extraordinary diversity of the resident population. Through a practical analysis of planning consultation processes undertaken in the London Borough of Tower Hamlets through the Borough's Statutory Consultation process for the Local Development Framework[1], opportunities for establishing genuinely intercultural approaches to planning consultation are identified, explored and recommended as good practice for the future.

Widening public participation in planning consultation provides a major challenge and a statutory duty for planners. This includes extending consultation to ethnic minority communities, based on a recognition that certain group interests have been historically privileged while ethnic minority groups have been excluded from planning processes (Krishnaryan & Thomas 1993; Beebeejaun 2004). However, this report asserts that efforts to target consultation to an increasingly diverse population have in most cases failed to establish platforms for genuine intercultural dialogue and have thus fallen short of informing the planning process with perspectives that reflect the complex reality of contemporary Britain. This is because, variously, they have been:

- Based upon a crude understanding of ethnic difference, with small numbers of 'community leaders' accepted as the voice of specific ethnic communities and the internal complexity and diversity of such communities overlooked or misunderstood

- Limited by a perspective that recognizes the views of the white population as the cultural norm and the views of ethnic minorities (or in some locations ethnic majorities) as inevitably different and in some cases aberrant – hybrid identities and complex intercultural views are not anticipated

- Undermined by weak and overly prescriptive consultation and participation strategies that are too often disconnected from complex intercultural social relations

- Damaged by an approach that prioritises speed and efficiency over quality and respect

- Standardised to elicit views on a 'community by community' basis rather than explorative of the overlap between communities and, more significantly, the combinations of perspectives rendered by intercultural communities where ethnicity and race do not operate as primary signifiers. In this sense, the pursuit of consultation with recognizable and labeled 'ethnic minorities' is misguided. Instead, the pursuit of consultation with complex, communities of overlapping and recombinant ethnicities, provides a closer relationship to the reality of an intercultural Britain.

In Tower Hamlets, a Borough awarded Beacon Status in the 'Community Cohesion', 'Getting Closer to Community' and 'Promoting Racial Equality' categories[2]; and a Borough that recognizes in its Regeneration Strategy that diversity is *the* major asset for economic comparative advantage as a 'Global City District'; genuine efforts are being made to build levels of engagement and partnership that embrace the complexity of the resident population. This is evident through efforts to improve community cohesion (such as through a recruitment strategies to develop a workforce that reflects the profile of local communities), to advance inter-faith understanding

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[1] A legally required approach as introduced by the ODPM in the 2004 Planning and Compulsory Purchase Act.
[2] It also has Beacon Status for the 'Supporting Social Care Workers 2004-2005' category.

(such as through the promotion of an Inter-Faith Network), and to raise academic achievement for Black Minority Ethnic (BME) pupils. Crucially, it is also evident through efforts to plan towards a Tower Hamlets of the future that reflects the aspirations and potential of a resident population that is increasingly diverse and a diversity that is increasingly complex.

This report provides a practical engagement with the statutory planning consultation process of Tower Hamlets. It commends the Borough for extending its consultation and engagement process beyond legal necessity to position BME communities at the centre of its Local Development Framework, and it highlights instances of innovative practice that can be further developed in the future and have a practical application in other contexts. However, the report also introduces opportunities for advancing consultation in Tower Hamlets (and elsewhere) towards a level that is genuinely intercultural, with flexible and subtle mechanisms recommended for engaging with communities constructed less by ethnicity and 'race' and more by a myriad of negotiated positionalities that are unique to the set of intercultural relations of a distinctive and ceaselessly transforming place. Crucial is the adoption of consultation and engagement as a permanent set of processes, underpinning the corporate approach of the local authority. Planning forms just one small part of wider processes of engagement and thus intercultural planning requires an intercultural approach across the whole local authority.

1.1 The Intercultural City

The Intercultural City project (www.interculturalcity.com) is a pioneering international research and development project led by Comedia in association with the Joseph Rowntree Foundation and individual sponsors (such as local authorities). In the UK, it is concerned with two questions:

"Does intercultural exchange enhance the potential for innovation?" and "Is the UK making the most of its diversity?"

With our towns and cities increasingly diverse (and with the complexity of this diversity accelerating), it is vital to comprehend how local and regional authorities are seeking to engage with local communities of which many are relatively new, isolated and probably little understood. Parallel to this, the opportunity exists to identify instances of innovation and good practice, as well as 'lessons learned' of the challenges of consulting with interculturalism, of satisfying the agendas of divergent communities of interest, and underpinning this with a commitment to quality.

Issues of ethnicity, cultural difference and 'race' are of increasing significance for planners and policy-makers; not least in a wider poltical context where sections of the media and significant decision-makers view cultural difference as a problem rather than an opportunity. Too often, the increasing complexity of Britain's population is understood as a hindrance to decision-makers and planners whose work would be considerably more straightforward in a more 'legible' and mono-cultural context. The response is therefore to simplify – make legible – that complexity to ensure speed and efficiency of action. The Intercultural City project insists that such approaches ignore the tremendous opportunities that an embrace with complexity can bring (such as through the innovative solutions and distinctive ways of seeing that can be evoked); but more significantly, they have a harmful impact on community relations, with communities variously marginalized, misrepresented and reified.

The Intercultural City project aims to draw conclusions which will both support policy makers at the local level and to contribute, through comparative analysis, to wider understanding of how to engage with and maximize the potential of complexity. With case studies ranging from Bristol to Brisbane; Newcastle-upon-Tyne to Drammen; the main aims of the project are to:

- Consider the extent to which cultural diversity is a source of innovation, creativity and entrepreneurship and how this can become a positive force releasing new energy and resources for the development of cities

- Seek to understand how the combination of different cultural skills and attributes leads to new and divergent thinking and what are the conditions that most encourage this

- Explore the extent to which increased intercultural dialogue, exchange and activity is the catalyst for this process

- Seek to understand the role of intercultural networks and intermediary change-agents, finding out who they are, how they work and what are the conditions which either encourage or hinder them

- Explore the institutional barriers and opportunities to maximizing economic benefits and aim to provide guidance for future policy on diversity and wealth creation in cities.

The terms 'multiculturalism' and 'interculturalism' are often used interchangeably, but they represent two quite different approaches to managing and building on the potential of ethnic and cultural diversity. The intercultural approach goes beyond equal opportunities and respect for existing cultural differences, to the pluralist transformation of public space, civic culture and institutions. Therefore, it does not recognise cultural boundaries as fixed but as in a state of flux and remaking. An intercultural approach aims to facilitate dialogue, exchange and reciprocal understanding between people of different cultural backgrounds. Advocates of this approach argue that cities need to develop policies which prioritise funding for projects where different cultures intersect, 'contaminate' each other and hybridise. This contrasts with the multiculturalism model, where funding is directed within the well-defined boundaries of recognised cultural communities. In other words, city governments should promote cross-fertilisation across all cultural boundaries, between 'majority' and 'minorities', 'dominant' and 'sub' cultures, localities, classes, faiths, disciplines and genres, as the source of cultural, social, political and economic innovation.

Correspondingly, in the context of planning consultation, interculturalism explores the syncretic voices of diverse communities that are constructed across lines of cultural and ethnic difference. In this sense, the internal diversity of an 'ethnic community' is explored, and the productive spaces of overlap and exchange between ethnicities are recognised as the most significant and meaningful locations for understanding the city and thus developing policy. By contrast, multiculturalism requires that communities defined by their ethnicity are consulted in isolation (i.e. 'the Caribbean community'; 'the Asian community' etc.), with the pursuit of difference and the celebration of that difference the dominant motive. Such an approach ignores complexity and fails to problematise the notional uniformity of a dominant 'white community'. Moreover, it has no practical purpose because the development of 'ethnicity-specific' policy or community-by-community service is no longer practical or affordable in a society configured by many more ethnicities, communities, and hybridities than it was just a few years ago.

Planners can no longer rely on a community-by-community approach to consultation to identify planning opportunities and solutions. They must move beyond a multicultural approach. For planners to truly know a place and to respond to that place as it changes, requires an intercultural approach to consultation. This is more expensive and time-consuming; it is messier; it can be more politically charged. However, if traditional approaches to consultation are continued, planning will increasingly represent a departure from the attitudes and aspirations of the people it targets. This report shows how planners in the most complexly diverse part of Britain are working to improve their consultation approach towards a genuine engagement with

the difficult, often fraught, though crucial, landscape of voices and possibilities expressed through the intercultural city.

2.0 Tower Hamlets: The Global City District

Tower Hamlets is a *place of diversity* with a complex and often chaotic social history and a dizzying contemporary physical and cultural landscape shaped by layer upon layer of flows in global trade, ideas and people:

To the east and along the Thames from Tower Bridge, Tower Hamlets features the vestiges of London's Docklands and their transformation into corporate and residential landscapes, from the cobbled historic ambiance of Wapping to Poplar and the expanding Canary Wharf. Running into the Thames by Trinity Buoy Wharf is the River Lea where Jerome K. Jerome once practiced boating along willowy banks now intensively industrialized, squeezed between the social housing of Canning Town and Bow, awaiting transformation through the 2012 Olympics and Paralympics.

At its heart, Tower Hamlets features the historic East End centres of Bethnal Green, Mile End and Stepney, where street markets jostle alongside the gothic spread of Victoria Park and the postmodern, weaving ecology thread of Mile End Park; and where large housing estates such as the Ocean are juxtaposed with expensive Georgian terraces. Queen Mary and Westfield University, Mile End Hospital, Stepney City Farm, the Ragged School Museum, Bethnal Green Museum of Childhood and York Hall draw attention to the historic and cultural breadth and depth of the area.

To the west, where Tower Hamlets meets the City of London at the historic limits of Shoreditch and Houndsditch, dense street patterns link market areas of Whitechapel, Petticoat Lane, Spitalfields, Brick Lane and Columbia Road, populated by youthful creative businesses and long-settled Bangladeshi residents and businesses. Christchurch Spitalfields, Toynbee Hall, the Whitechapel Gallery, the Royal Bartholomew Hospital, and the East London Mosque stand as institutional and cultural cornerstones of the physical landscape, reflective of the composite cultural landscape. Relatively new arrivals such as the Algerian café on Greatorex Street, the advertising agencies on Fashion Street, and the independent art galleries on Redchurch Street, symbolize the inchoate, always-in-motion cultural reality of a transforming Borough.

Figure 1: Tower Hamlets Location

2.1 A Diverse Borough

Tower Hamlets, as the Gateway to Empire and as a zone at the edge of the historic centre of London, has always been a diverse place. Historians estimate that from 1590 French Huguenots[3] developed silk weaving in Spitalfields; in 1910, there were 120,000 Jews in the old London Borough of Stepney alone[4]; a significant Black population has lived in the Borough since the 1600s – linked originally to the maritime industries and as servants; and the Bangladeshi population has grown from small-scale initial immigration in the 1600s to over one third of the Borough's total population. It is a 'port of entry' location and an area that has traditionally accommodated large-scale in-migration and general population movement. The historical prevalence of social housing, of socially-focused support institutions and services, of traditional labour intensive industries (such as textiles) and – more recently – the attracting power of global finance firms[5], add further factors that contribute to the flux and diversity of the Borough.

The 2001 Census population total for Tower Hamlets was 196,106[6]. At the time of the 2001 census, 58% of the population in Tower Hamlets belonged to an ethnic group other than White British. A third or 33% of the population were Bangladeshi, 7% came from African/Caribbean backgrounds and the total White British population was 42%. Over half of the Bangladeshi population is under 20 years old[7], with similarly young demographic profiles amongst other BME populations – not least the relatively newly arrived (and yet to be measured) Eastern European population of young, highly mobile economic migrants. Other numerically significant BME populations include Somali, Vietnamese, Chinese, American, and residents from elsewhere in the EU.
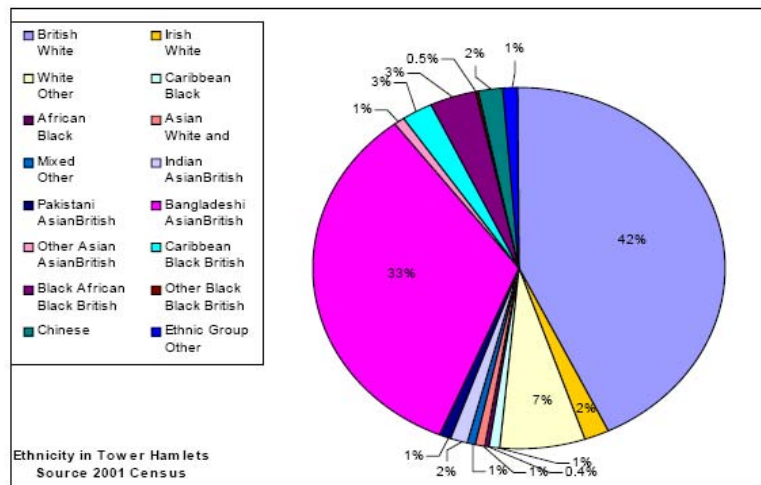

Figure 2: Demographic Profile of the Borough

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[3] French Protestants escaping from Catholic persecution in France.
[4] The descendents of Jews fleeing the pogroms in Eastern Europe.

[5] Over the past 10 years the borough economy has undergone major structural changes with significant employment growth in the banking and financial service sector. This now represents over 40% of all employment within the borough.

[6] Tower Hamlets has been identified by ONS as an area where there is a significant risk of population under-estimate in the 2001 Census. This risk assessment is based on the high number of Census variables associated with undercount present in the borough. These include: the number of males aged between 25 and 39, multi-occupancy, unemployment, country of birth, number of dummy forms and the amount of private rented accommodation.

[7] By contrast, 60% of the White population is over 30.

Population growth in Tower Hamlets up to 2001, for the ten years since the 1991 census, represented the second largest growth rate for this period of all the London Boroughs at 17.9%, or over 45,000 people. Population growth in Tower Hamlets is predicted to accelerate further into the twenty-first century, outstripping growth in Greater London as well as in other Central London Boroughs. The Greater London Authority has estimated that by 2016, population will increase to nearly 300,000 due to a combination of natural population growth and the effect of regeneration initiatives. With a youthful BME population and increases in global in-migration, a larger population is likely to equate to a more diverse population.
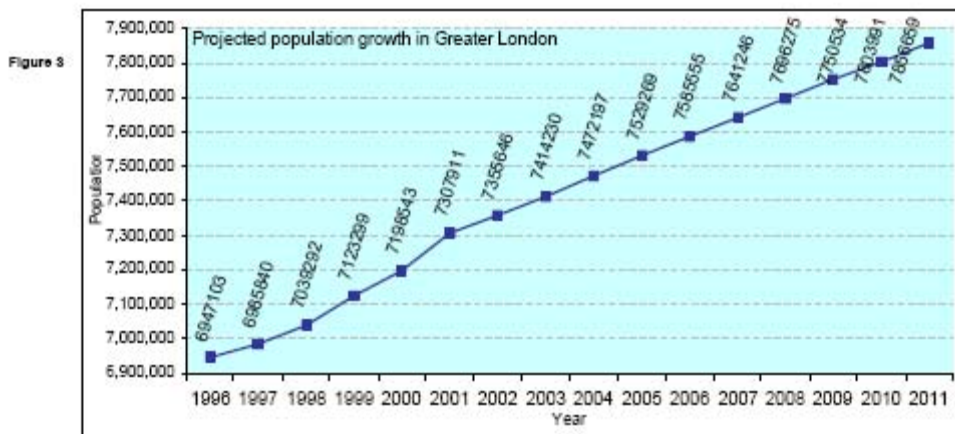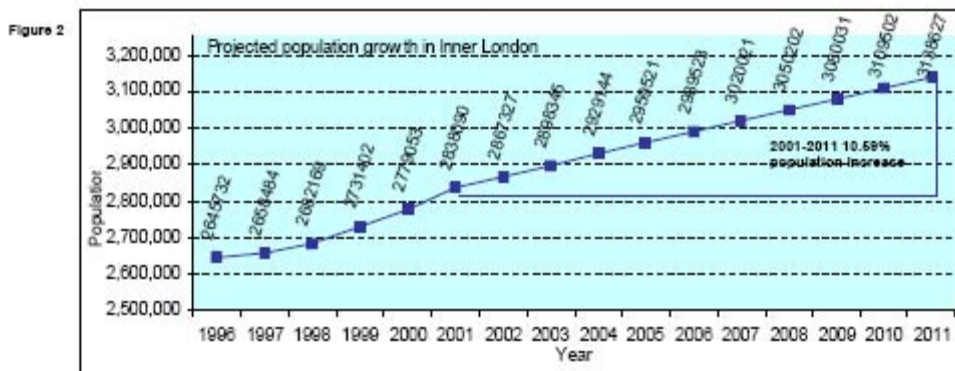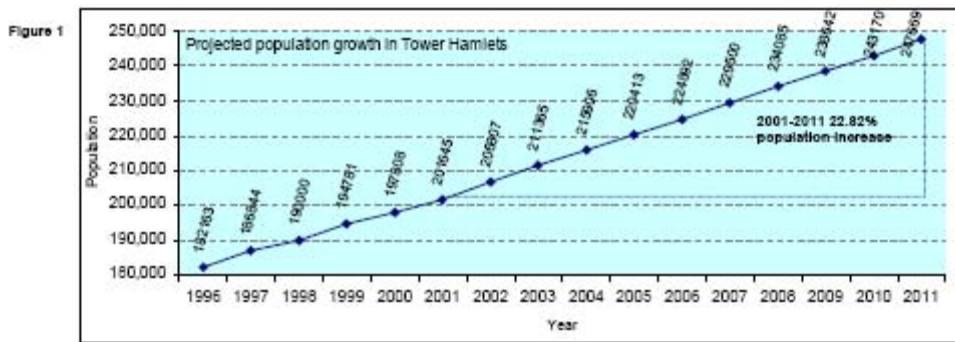
Figure 3: Population Growth in Tower Hamlets

This growth in population and diversity brings with it a range of challenges – linked to service delivery, planning and community cohesion. In Tower Hamlets, diversity is not consistently complemented by strong and harmonious community relations. From the crimes of slavery and the oppression of minorities in the 1700s and 1800s, to the Battle of Cable Street in 1936[8]; from the racist violence of the 1970s, to the 1999 nail bomb of Brick Lane; and through all the multi-faceted processes and instances of racism that have inflected the East End for centuries; Tower Hamlets is a place where the cultural politics of race and place are played-out with a sharp edge unseen in most other places. This means that the greatest strength of Tower Hamlets – its diversity and its interculturalism - must be engaged with appropriately if it is to continue to be such a strength as the Borough transforms. This is a present and future challenge given that BME populations in the Borough today experience disproportionately high levels of deprivation and are faced by a string of barriers to a fulsome, vocal and respected role in the wider Borough community – as introduced below:

2.2 A Deprived Borough; a Transforming Borough

Tower Hamlets is also a Borough of significant demographic variation in terms of levels of prosperity and/or deprivation. For example[9]:

- In 2003/04, the Borough had Britain's second lowest proportion of working-age residents that were employed, with 37% of the working age population economically inactive

- 36% of the Borough's Bangladeshi residents were economically inactive in 2001, compared to 26% of White British residents

- 22% of areas in the Borough are in the most employment-deprived 10% in England

- 15% of the Borough's economically active population hold no formal qualifications, compared to 9% across London, with disproportionately few BMEs accessing formal qualifications

- A quarter of households in the Borough have income below £15k, compared with a fifth across London. However, the mean Borough salary is comparable to London levels (£38,000), indicating that significant disparities exist between the wage levels of the highest earners and those of the rest.

The Borough is clearly one of the most deprived areas of the country, with deprivation in Tower Hamlets evenly spread and pockets of severe deprivation in all areas, establishing the Borough as among the four most deprived local authority areas in England[10]. The most deprived Ward is Limehouse, ranked 252nd of the 32,483 SOAs in England. Yet the Borough also has one of the fastest growing economies in London, propelled by the eastward expansion of the City's financial district and supporting activities in the City Fringe, by the growth in financial services concentrated in Docklands, by an increase in the service economy, and by an influx of 'knowledge workers'[11]. Demographic change in the Borough is being matched by physical and economic change. Canary Wharf is already the UK's second largest financial centre and a major retail and leisure destination, and is set to house an additional 16 million square feet of commercial floor space; the Borough has 6 miles of increasingly developed Thames river front, plus desirable waterfront settings throughout Docklands, on the River Lea, and by the Regent's

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[8] Where anti-fascists successfully fought to stop the police clearing a route for Oswald Mosley's fascist march
[9] Source: Tower Hamlets Employment and Income bulletin V. 5.2
[10] Tower Hamlets Indices of Multiple Deprivation 2004
[11] Tower Hamlets has the highest proportion in Britain of employment in knowledge-driven companies – Tower Hamlets Draft Regeneration Strategy, 2005.

Canal; and the fine grain of the City Fringe and other parts of the Borough are home to a flourishing small business sector, with the Creative Industries playing a major role in the physical and definitional transformation of previously derided locations such as Spitalfields and Shoreditch.

Further significant change is anticipated, including some of the largest public infrastructure projects in the UK: rebuilding the Royal London Hospital, setting-up the East-West London Crossrail link, extending the East London Line, developing the Lea Valley and environs for the 2012 Olympic and Paralympic Games, and spearheading the wider Thames Gateway development – the largest regeneration programme in Europe.

It is thus increasingly important that the Borough and partners work effectively to manage and plan for change. The physical, economic and social fabric of Tower Hamlets can be strengthened and improved by anticipated changes in the Borough – be they changes in demographic profile, economic activity or transport infrastructure. As envisioned in the Borough's 2005 Regeneration Strategy, 'Creating and Sharing Prosperity' in a 'Global City District' is a desirable and achievable goal for the Borough if it is capable of embracing and engaging its diverse assets, and most particularly its human resources – the globally inflected and locally embedded communities of workers and residents that are forging increasingly intercultural spaces currently beyond the vision and reach of key policy and decision-makers, including planners.

2.3 Embracing Diversity, Approaching Interculturalism

The Borough of Tower Hamlets prioritises diversity and the ways diversity is distinctively played-out in the as a key asset for the successful ongoing transformation and regeneration of the Borough. This prioritization moves beyond basic notions of fostering strong communities and a civil society towards a commitment to diversity – focusing on the skills, talents and ambitions of local people – as an economic driver in its own right. Moreover, this does not only refer to the positive externalities of global workers in the corporate sector, but to the capacity of the Borough's less economically and socially mobile population to influence the ways the Borough changes and to benefit collectively from such changes.

This approach is expressed by a range of Borough strategies, not least the Regeneration Strategy and the Community Plan. These documents operate as part of a wider strategic context – including that prescribed by The Mayor of London[12], Thames Gateway London Partnership[13], and the Office of the Deputy Prime Minister (ODPM)[14].

The Regeneration Strategy has 4 Development Priorities:

- *Develop the Economy:* focusing on advancing the knowledge economy and Creative Industries, the tourism, hospitality and leisure sectors, and other sectors that are strong value-adders in processes of industrial restructuring. There is also a strong focus on supporting social enterprise, supporting business information and networking, and improving the general business climate.

- *Develop People:* targeted towards maximizing the value of the young and diverse population through a focus on reducing unemployment (especially among BMEs and youth), improving qualification and core skills (including 'job readiness' issues), reducing benefit traps, and easing the transition from education to work. Many thousands of jobs

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[12] See: GLA (2004) *The London Plan.*
[13] See: London Thames Gateway Development and Investment Framework, 2004
[14] See: ODPM (2004) Sustainable Communities – People, Places and Prosperity, a 5 Year Plan. Also see ODPM (2004) Creating Sustainable Communities-Making it Happen: Thames Gateway and Growth Areas

will be created in Tower Hamlets over the coming years[15]. Crucial will be the extent to which they are filled by the diverse, youthful local population.

- *Develop Places:* In line with the Government's Sustainable Communities Programme, economic development is tied absolutely to creating high quality neighbourhoods and districts. The London Plan stipulates that at least 25,000 new homes will be built and 150,000 jobs created in Tower Hamlets by 2016. Much of this development will be concentrated on the relatively under-used land to the east of the Borough (in the Lea Valley), on the Isle of Dogs(including the expansion of Canary Wharf), and to the west of the Borough in the City Fringe. This requires very careful planning – to ensure high density is achieved through environmental and aesthetic quality; that a good social and cultural mix is established; that the public realm is of a very high standard; and that service provision (such as schools and GPs) matches the requirements of new, increasingly diverse populations and the existing population. Effective enagement and consultation with diverse local residents and stakeholders is thus paramount for a successfully regenerated Tower Hamlets.

- *Develop Marketing:* building confidence in the Lower Lea Valley – just as it has been built in previous 'unlikely locations' such as the City Fringe and Docklands, to attract public and private sector investors. The 'Global City District' brand is key here – emphasizing the connectivity, diversity and mobility of the Borough.

The 2001 Community Plan has an overall vision to:

"*Improve the quality of life for everyone living and working in the Borough.*"

The goals of the Community Plan are:

- A better place for living safely
- A better place for living well
- A better place for creating and sharing prosperity
- A better place for learning, achievement and leisure
- A better place for excellent public services

The Plan is updated yearly by Local Area Partnerships and Community Plan Action Groups – which work to canvas local views and then translate them through the Community Plan. A crucial challenge written through the Community Plan is to reduce the widespread inequalities of the Borough and (relatedly) build stronger, more connected communities that embrace their diversity. This underpins the Tower Hamlets Statement of Community Involvement – the document that informs the Statutory Consultation process for the Tower Hamlets Local Development Framework. The effectiveness of this consultation process (and the preceding non-statutory consultation process) can be evaluated across a range of agendas – such as the extent to which clear views were established and propositions developed, the level of involvement from different parts of the Borough, and the level of comprehension regarding the capacity and power of the Borough to act on recommendations.

However, given that it is a leading strategic agenda for the Borough, and given that it is a factor that is historically neglected or mismanaged in planning consultation, the remainder of this report focuses on how the Borough has sought to engage and consult with and learn from its diverse local population. Moreover, the report goes beyond a focus on processes and products of consulting with diversity; it focuses on how diversity is engaged with as a *factor of*

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[15] The Mayor's London Plan targets 150,000 new jobs by 2016.

interculturalism. Here, communities are not understood and consulted solely in terms of their ethnicity, rather for the multiple ethnically and culturally inflected identities that contribute to the *intercultural communities of interest* that make up contemporary senses of place. The reach and effectiveness of accessing voices that are – for example – at once 'Black', 'Bangladeshi', 'White', 'East End', 'Islamic', 'Christian', 'British', 'Londoner', provides a critical focus for this research. This is because it is the proliferation and reassemblage of such markers of identity that reconfigure senses of community and place in the contemporary city. Markers of identity such as 'Bangladeshi' are constantly re-articulated and translated contextually - through the social relations of the local. To state that 'the Bangladeshi community has been consulted' is thus in effect a meaningless statement.

The 'views of the Bangladeshi community' (or any other 'community') are the conjunction of many histories and cultural identities (re)negotiated, politicized, and embodied through social relations with other 'communities' and through the ways the questions are framed and addressed. Correspondingly, notions of the 'Bangladeshi' (or any other) community are dependent on processes of construction that can clumsily confine individuals to a notional 'community' without an appreciation that individuals occupy several communities simultaneously and that ethnicity or 'race' might not be the primary signifier for those communities. Identities *and* identifications are *transcoded* between different discourses of community and place; discourses that can complement or compete against each other (see Stallybrass and White 1986). Notions of what constitutes the 'we' and the 'I' are (re)configured in processes of positioning: belonging and individuation as discursively constituted, *intercultural* identities.

Of additional concern is the way communities (and thus 'communities to consult) can be constructed without allowing for an analysis of how the mainstream (read 'normal', non-deviant) community (most often the 'White community') is understood – despite the obvious internal complexity of this community and its relative power.

To understand and plan for the Intercultural City requires that the conceptual boundaries of community are re-drawn, senses of place are revised, place is opened as a point of connection which *displaces* bounded notions of place identity (P. Crang 1996). The 'local' is exposed as the 'trans-local'; 'community' is re-moulded as 'inoperative', dialogical, beyond spatial essentialism (see Nancy 1991); and identities and ethnicities are re-positioned as fluid, creolized (Hannerz 1987; Glissant 1992), syncretic constructions within cultural-political processes where cultures and their constructed communities are made and re-made.

Effective intercultural consultation allows hybridities to be expressed and surplus meanings and conditions of 'in-betweenness' to leak across the boundaries of fixity, unity, tradition and authentication. Intercultural consultation leads planners to the complex hybrid realities of local people. Fredric Jameson (1991 p.332) asserts that "everyone represents several groups at once"; Doreen Massey makes the point that places and communities should be conceptualized in terms of fluidity, connection, contradiction and conflict (Massey 1991 p.275). Intercultural consultation leads to a schematic overview of the multiple views of a locality by attracting multiple narratives and views and abstracting them to inform planning models and processes in a way that is both practical *and* sympathetic to the complexity and constant motion of 'local communities'. In a place such as Tower Hamlets – so raggedly intercultural and so much in motion – an intercultural approach to planning consultation is imperative if the products of consultation are to relate effectively to notions of community and place recognizable to local (read global and diverse) people.

3.0 The Consultation Approach: Establishing Local Development Frameworks

The London Borough of Tower Hamlets is currently developing its Local Development Framework (LDF). The LDF is the legally requisite planning blueprint for the Borough up to 2016. It consists of:

- Development Plan documents
- Supplementary Planning Documents
- Statement of Community Involvement
- Local Development Schemes
- Annual Monitoring Report
- Local Development Orders or Simplified Planning Zones that may be added
- The Tower Hamlets Challenge – Establishing an intercultural approach to consultation (to include the technical task ahead

3.1 The Local Development Framework: The Consultation 'Product'

The Tower Hamlets LDF (which replaces the Unitary Development Plan) will be of key importance in helping to achieve the overall vision for the Borough – as introduced in the Community Plan and Regeneration Strategy. It will contain the planning policies and development proposals for building and land use in Tower Hamlets, over the next ten years and beyond. Government legislation has recently introduced changes to the laws that govern land-use, in England and Wales, with a corresponding requirement that the plan-making process is being updated. The LDF is the ultimate 'product' of consultation processes:
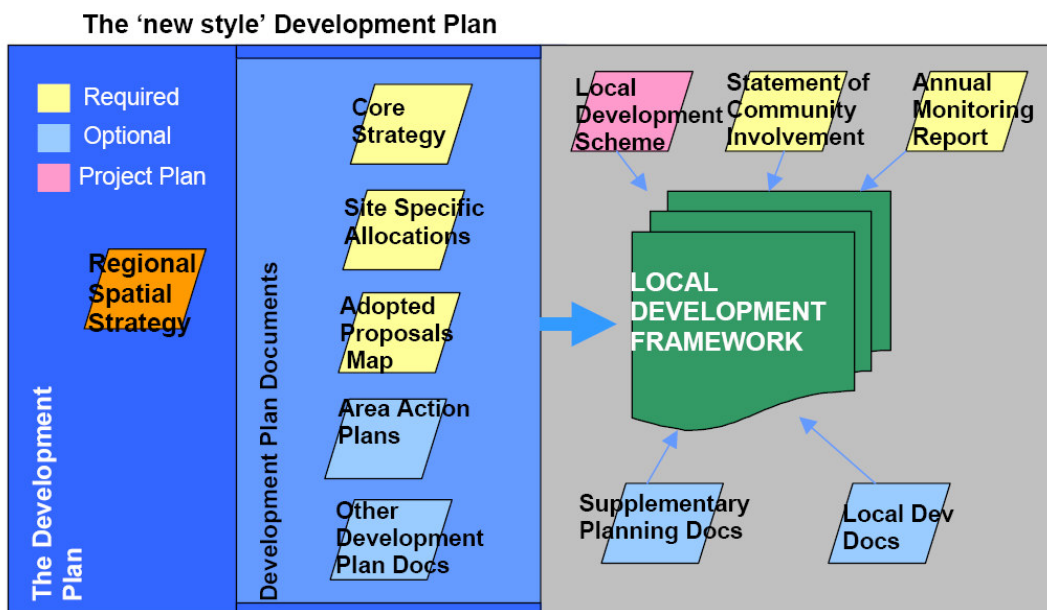

Figure 4: The New Style Development Plan

3.2 The Statement of Community Involvement: Framing the Research

The LDF is dependent upon a process of statutory consultation with the Tower Hamlets population. The Borough also undertook a process of non-statutory consultation to seek to ensure that the themes of the statutory consultation process appropriately reflected the views of local people – these are the 'Preferred Options' for the following stage of statutory consultation. The statutory consultation process is underpinned by the Statement of Community Involvement (SCI) – itself subject to consultation to test its relevance and focus (although this consultation was not required by law). The SCI represents a set of standards employed by the Council when seeking to involve local residents and other stakeholders in the planning process – from early consultation to detailed planning. The SCI promises that:

-   Consultation and involvement will be well-planned and co-ordinated

-   Clear information will be provided

-   Consultation and involvement will be held over a flexible timescale

-   The purpose of each consultation and involvement process will be set out

-   A variety of methods will be used

-   Accurate records of responses will be kept

-   Summaries of consultation and involvement findings will be made public

-   Participants will be told of the results of programmes

-   Where appropriate, local voluntary groups will be encouraged, and helped, to participate in exercises

-   All exercises will be reviewed and monitored

-   Training and guidance will be provided where it helps to get people involved

3.3 The Local Area Partnerships and Area Action Plans: Towards Preferred Options

The above SCI promises provide a practical framework for a discussion of how Tower Hamlets Council undertook the statutory consultation process over 12 weeks in the Autumn of 2005[16] for the LDF. These are promises that, when rearticulated in an intercultural context, become significant challenges for a Borough committed to involving and consulting with its diverse population (and understanding this diversity as a key strength/opportunity for the Borough), though unfamiliar with the complexity of interculturalism and the implications of this complexity for effective intercultural consultation.

Both the non-statutory and statutory consultation processes were led by the Consultation and Involvement Team, with the support of the Borough's Strategy Team (which includes the Development and Renewal Planners), the Partnership Support Team, and the Local Management Team (the Area Directors). Consultation focused on establishing Preferred Options for the LDF (in

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[16] 30th September to 23rd December 2005.

the non-statutory consultation, expressed through the Area Action Plans), and more detailed agreed options through the (statutory consultation).

Statutory and non-statutory consultation was parceled into the 8 Local Area Partnerships (LAPs) of the Borough. These form delivery areas for Tower Hamlets Partnership (THP), with a THP team for every 2 LAPs (1&2, 3&4, 5&6 and 7&8). The Tower Hamlets Partnership works to develop better services for local people and deliver the goals of the borough's Community Plan[17]. It brings together key stakeholders - residents, the council, the police, the health service, public services, voluntary and community groups, faith communities and businesses towards ensuring residents have a much stronger voice and influence over service provision and ongoing development issues. This reports directly to Council Departments and to the Partnership Management Group; it is supported by the Borough's Partnership Support Team[18]. Each of the LAPs has formed a 'Steering Group' made up of local stakeholders. Steering Groups, in which local ward councilors have a key role, help to organise and develop the work of the LAPs, planning events and meetings – including consultation events. They come together on a more regular basis than the full LAP. Membership of each Steering Group consists of between 6 and 12 people. These are identified through full LAP meetings where volunteers are sought who are willing to commit themselves to active participation in the group for one year.
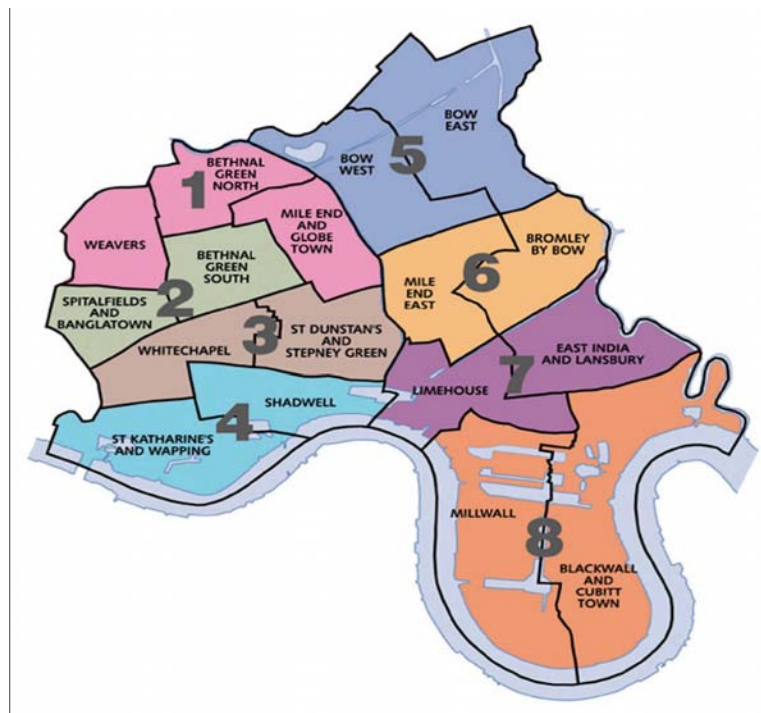
Figure 5: The Tower Hamlets LAPs

The most intensive consultation focus was on the 3 'Opportunity Areas' (as defined by the Mayor of London) in the Borough. These are LAPs 1 & 2 (City Fringe); LAPs 5 & 6 (Leaside); and LAPs 7 & 8 (Isle of Dogs). The LAP teams worked with the Council to develop Area Action Plans for each LAP – which defined the Preferred Options to be tested through the Statutory consultation

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[17] There is a Community Plan Action Group (CPAG) for each of the key themes in the community plan. CPAGs are charged with delivering joined-up services in line with the priorities agreed with local people.
[18] This group involves representatives from the four main areas of the Borough (2 LAPs make-up each of the 4 main areas) and representatives of the CPAGs, together with local councilors and representatives from the major service providers, businesses, voluntary and community sectors. It is a slim, strategic group with responsibility for developing the overall strategy and ensuring that plans are delivered effectively.

process (to establish the overall LDF). The Council's statutory consultation promotional leaflet summarises the Area Action Plans for each of the Opportunity Areas. Crucially, these are based upon processes of non-statutory consultation (they are therefore dependent on the effectiveness of this consultation) and framed by policy drivers and guidelines, with the Mayor's London Plan and the Government's Sustainable Communities Plan (2003) key[19].

The non-statutory consultation process included a series of 15 public consultation meetings/focus groups (May 24th to June 13th 2005), and processes of testing with stakeholders - through technical appraisals such as property market and delivery reviews. The focus groups were recruited through the Tower Hamlets Community Panel, Parents' Panel and E-Panel[20]. Each of these panels is promoted through the 'Get Involved and Make a Difference' leaflet issued by the Council's Consultation and Involvement Team. An additional focus group was held with a small sample of representatives from the Tower Hamlets Business Forum. A total of 175 residents participated in the non-statutory consultation process.

Key findings are outlined in the 'Report on Focus Group Outcomes', which were subsequently translated by planners to ensure issues of sustainability and strategic complementarity (such as with the London Plan) were fully explored. These form the Preferred Options for each LAP Opportunity Area – as summarized below:

LAPs	Key Policies – Preferred Options
City Fringe	- Accommodate substantial new jobs, homes and associated uses near public transport at Bishopsgate/South Shoreditch and Whitechapel/Aldgate - Promote flexible small business accommodation, including affordable accommodation - Provide a greater proportion of homes suitable for families on large development sites - Provide over 4 hectares of new public open space and 3 new health centres - Promote tourism and hotels at important existing tourist destinations - Promote leisure and evening uses at key locations including Brick Lane, Tower Hill, St. Katharine's Docks and Tobacco Dock - Improve walking, cycling and public transport connections
Leaside	- Promote continued growth of the global business cluster around Canary Wharf - Reinforce Opportunities for commercial premises within the Millennium Quarter and Wood Wharf that complement canary Wharf - Promote a range of new housing – including larger, more traditional homes in the south – to meet the needs of local communities - Support new homes and residents with 3 modern new health centres and new schools - Focus the majority of new retail provision to the existing ASDA site and Canary Wharf - Improve evening leisure opportunities for residents, workers and visitors through cultural activities, bars, restaurants and hotels, whilst being mindful of reducing noise and any other impact on residential communities - Invest in improving open space at Sir John McDougal Gardens and Millwall park, as well as more small, publicly-accessible parks within new, large residential and office developments

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[19] A range of 'checks and balances' are also applied to the issues and options explored and identified (as 'preferred' by consultees through the non-statutory phase. These include a sustainability appraisal by Levett-Therivel.

[20] The Community Panel is made up of over 2,000 local residents who have agreed to be consulted on a range of issues, such as Education, Crime, Environment,
Housing, Transport and Health. The Parents' Panel has over 700 members and is seen as a way of diversifying engagement with parents. The E-Panel allows for on-line surveys to be conducted.

	- Improve pedestrian, cycle and transport links within the Island as well as on and off the Island - Provide greater access to the river and dockside areas
Isle of Dogs	- Capture the investment potential provided by the Olympics and Paralympic Games to benefit local people including new homes, jobs and facilities - Retain employment land in parts of Fish Island, Empson Street/St. Andrew's Way and Gillender Street - Promote new business space, especially for design and design-related manufacturing and creative arts and cultural industry uses in the Leamouth and Three Mills area - Allow higher density developments in appropriate locations, such as near Bromley-by-Bow station - Require a range of housing types, especially larger homes - Support 3 new primary schools and modern health care centres to meet the needs of existing and new communities - Support the extension of the Olympic Park alongside the Rover Lea to the Thames, and a new district park at Leven Road

The balance of preferred options that are consultancy-derived or policy-derived (from powers beyond the locality – such as the Mayor) is a key issue in determining the value of consultation and the respect conferred by local people on its findings – i.e. the preferred options. This is discussed further in **Section 4** below.

3.4 Additional Consultation Stakeholders and Partners
The LAPs provided the key mechanism for interfacing with local communities and LAP teams undertook a major role in organizing consultation processes. However, the Council also worked closely with a range of formal and informal organizations and networks as a way of broadening consultation and attracting a greater diversity of responses. The efficacy of this process is assessed in **Section 4** below. Issues were tested and consultees recruited through the Youth Parliament[21], the Community Organisations Forum[22] (non-statutory and statutory), and a range of informal points of engagement with stakeholders and partners that include housing associations, schools, economic development agencies and social services intermediaries.

3.5 The Statutory Consultation Phase
The statutory consultation phase for the LDF was undertaken over the prescribed 12-week period – from September 30th to December 23rd 2005. Its technical focus was to consult on the Preferred Options identified in the Area Action Plans. This process was led by the Borough's Strategic Planning Team, supported by the Consultation and Involvement Team. Crucial was the partnership and support provided by the LAP teams. Put simply, the statutory consultation phase involved 6 key interfaces and methodologies:

- **LAP Consultation Events:** 4 events were held in November 2005 – for LAPs 1&2, 3&4, 5&6 and 7&8. These involved an introduction by the LAP Directors (in some cases a Councilor); a description of the purpose and process of the statutory consultation (by a planner or by Planning Aid for London – the professional body contracted by the Council to support its consultation process; a video envisioning the future of the Borough and thus the importance of effective consultation for the Borough's potential to be reached; a series of group workshops that focused on specific Preferred Options; a feedback

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[21] An initiative of Tower Hamlets Youth and Community Services Department.
[22] COF is the Council for Voluntary Services. Their aim is to build and support a strong independent voluntary and community sector to better serve Tower Hamlet's diverse communities. The membership includes most voluntary organizations in the Borough. Key services include: fundraising, group development, training and capacity building.

session; and a summary by a member of the LAP team or a colleague (such as a Borough). Participants were encouraged to fill-in and sign the formal **Representation Forms** (either at the event or anytime before the December 23rd deadline) - the only means by which views can legally be expressed and accepted as statutory consultation. The effectiveness – through an intercultural lens - of this key consultation methodology is discussed in **Section 4** below.

- **Youth Sessions:** A stall was held at Tower Hamlets College in October 2005 and an evening event (entitled 'The Matrix') was held in November 2005 – led by the Tower Hamlets Strategic Planning Team in consultation with the Borough's Youth Participation Team and Planning Aid for London. Children between the ages of 11-18 attended. The event began with an introduction to the planning and consultation process. LDF Preferred Options were re-phrased to fit suggestions made by a Youth Partnership Meeting held in September 2005 – on the basis that the LDF wording was not appealing to young people. Workshops were held on these themes (with the group separated into 6 sub-groups) – followed by a feedback session and a second workshop where groups were tasked with developing their 'ideal high street'. Proposals were made available for viewing on the AMP website: www.amp.uk.net – an important Youth Portal for Tower Hamlets.

- **Additional Events:** The Strategic Planning Team presented at a range of events across the Borough, such as the COF event in the Brady Centre, December 2005.

- **Talk to a Planner Drop In Sessions:** 3 sessions were held in October at the Borough's 3 Ideas Stores**.** These lasted a total of 11 hours. Local people were encouraged to engage with planners to discuss the LDF – towards filling-in a Representation Form.

- **Information Stands:** Permanent displays were provided in Council offices, libraries and the Ideas Stores. Documents – such as Area Action Plans – were also provided at these locations.

- **Local Media Dissemination:** The Borough's newspaper – East End Life – heavily promoted the consultation process and encouraged participation throughout the statutory consultation period. Additional media were approached by the Strategic Planning Team and the Consultation and Involvement Team – these included local Somali and Bengali radio stations and press. However, coverage was not high in non-Borough-managed media (see **Section 4** below).

- **www.towerhamlets.gov.uk/consultation:** Detailed information and Representation Forms were provided on the Borough's website, plus on links from other websites (such as COF and AMP). The Borough website provided the most detailed and up-to-date overview of consultation proceedings.

3.6 Equalities Impact Assessment

Concomitant with the statutory consultation process, the Borough undertook an Equalities Impact Assessment (EqIA)[23] of the Preferred Options stage of the Local Development Framework, to address Equalities, meet the aspirations of the Council's Equalities Agenda and its statutory obligations under the Race Relations Amendment Act (2000)[24]. The Council published for

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[23] The EqIA will be further up dated to take account of comments and recommendations from Cabinet and any additional new policies.

[24] The Race Relations (Amendment) Act (RRA) 2000 requires all public authorities to promote racial equality. The general duty of the RRA requires the Council to: eliminate unlawful racial discrimination, promote equality of opportunity, and promote good race relations between people of different groups.

consultation its Draft Equality and Diversity Scheme in March 2005. The Scheme encompasses all the Council's six equalities strands of race, gender, disability, age, sexual orientation and religion or belief. The EqIA provides an assessment of where equalities issues are most marked in relation to specific Preferred Options. For example, equalities issues are considered highly relevant to decisions on social housing provision but less so on commercial developments. The extent to which such 'impact assessments' are framed by an intercultural interpretative position is questionable and contributes to a common theme in **Section 4** below, where an attendance to issues of 'equality' in planning can in fact obfuscate the most important 'equalities issue' – that the complexity of the local population is fully engaged. If the prioritization of 'equalities issues' against specific Preferred Options is not undertaken through an intercultural lens, then it is unlikely that a genuine position of equality in planning will be reached. The next section of the report tests the extent to which the statutory consultation process for the Tower Hamlets LDF (as introduced above) was channeled through an intercultural lens, with genuine complexity pursued and engaged.

Figure 6: City Fringe – LAPs 1 & 2

Figure 7: St. Katharine's Dock – LAPs 3 & 4

4.0 The Local Development Framework: Reaching New Voices, Building Intercultural Consultation

"Tower Hamlets Council is committed to improving local services. We recognise that this can only be achieved if council policy and service delivery reflect local views and priorities" (www.towerhamlets.gov.uk/consultation).

It is clear Tower Hamlets Council is committed to ensuring that the LDF is embedded within a rigorous and innovative approach to consultation (statutory and non-statutory) where issues of equality are fully appreciated (such as evidenced through the EqIA) and the diversity of the Borough is progressively engaged as an asset for its successful future development. Indeed, the commissioning of this research evidences a commitment to this agenda. However, genuine intercultural consultation is difficult to achieve because it is expensive and intensive to implement, it requires a constant (re)engagement with a transforming population, and it is as dependent upon the long-term corporate policy of the Council as it is on the shorter-term consultation practice of a planning team.

As will be shown, Tower Hamlets has made significant progress in identifying the intercultural axes of its population and reaching-out to deliver consultation and planning processes along these axes. Yet the statutory consultation process for the LDF was limited by time (12 weeks is not very long to establish intercultural engagement), resources (intercultural consultation is expensive), structure (planning consultation operates within a tight and inflexible legal framework), the positionality of planners and colleagues (relating to issues of intercultural literacy and identity), and strategic context (good practice in wider processes of community engagement can take several years to translate into trust and confidence from intercultural consultees). In Tower Hamlets, a range of basic intercultural consultation practices are yet to be implemented and the broader Corporate approach to community engagement is currently managed along a multicultural approach of demarcating community by ethnicity and celebrating difference on these terms.

Beyond Legal Requirement – The Intercultural Commitment of Tower Hamlets Council
The commissioning of this research shows a commitment by Tower Hamlets Council to improving understanding of the needs and aspirations of the diverse local population, and to establishing stronger ties to its intercultural communities. This is beyond the legal requirements of a local authority undertaking consultation. Indeed, it is clear that by commissioning this research and evidenced by some of the good practice undertaken (not least the extensive non-statutory consultation process), that the Council is committed to broadening engagement and building stronger communities across every delivery area. This is a corporate ambition of which planning consultation plays a small though symbolic role.

The Council is exceeding legal requirements set out through National Planning Guidance. The National policy framework for development plan is set by Regional Planning Guidance, Planning Policy Guidance Notes (PPGs), Government circulars and other Government documents and strategies. Planning Policy Statement 1 sets out the Government's objectives for the Planning System. Key principles of the planning system are that Local Authorities:

- Should ensure that development plans promote outcomes in which environmental, economic and social objectives are achieved together over time
- Should promote high quality inclusive design in the layout of new developments and individual buildings in terms of function and impact
- Should contain clear, comprehensive and inclusive access policies.

Policies should also consider the people's diverse needs and aim to break down unnecessary barriers and exclusions in a manner that benefits the entire community; and ensure community involvement. PPS1 also indicates that Development Plans should promote social cohesion and inclusion by including policies which

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ensure that the impact of development on the social fabric of communities is considered and taken into account; seek to reduce social inequalities; address accessibility (both in terms of location and physical access for all members of the community to hobs, health, housing,
education, shops, leisure and community facilities; take into account the needs of all the community, including particular requirements relation to age, sex, ethnic background, religion, disability or income; deliver safe, health, attractive place to live; and support the promotion of health and well being by making provision for physical activity.

PPS12 sets out the policies which local planning authorities should take into account when preparing "local development frameworks". A guiding principle of PPS12 is that the local development framework should contain within its documents an integrated set of policies which are based on a clear understanding of the economic, social and environmental needs of the area and any constraints on meeting these needs."
Para 3.7 requires local planning authorities to comply with the Race Relations (Amendment) Act 2000 and the Disability Discrimination Act 1995.

Notions of establishing effective and sustainable intercultural engagement and consultation are not introduced by PPGs.

Through a direct engagement with the Borough's Strategic Planning Team, attendance at consultation events, and in-depth qualitative interviews and focus groups with diverse groups, organizations and intermediaries across the Borough, an assessment of how the statutory consultation process can be attuned through an intercultural lens has been undertaken[25]. Internal Tower Hamlets Council monitoring forms are also interpreted to identify ways of improving intercultural consultation. Findings are articulated below through a matrix that tests the level of intercultural consultation undertaken by the Borough by interpreting the Statement of Community Involvement (see **Section 3** above for an introduction) through an intercultural lens. The matrix is followed by a series of observations and recommendations that help to identify how consultation methodologies can connect with an increasingly intercultural population. Feedback from interviewees is presented and abstracted to illustrate the challenges for the Borough in pursuing this agenda.

Figure 8: The Lower Lea Valley – LAPS 5, 6, 7 & 8

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[25] A more detailed research methodology is provided in **Appendix 2**.

Figure 9: Canary Wharf on the Isle of Dogs – LAPs 7 & 8

4.1: The Statement of Community Involvement – Through an Intercultural Lens

The Statement of Community Involvement – the statutory means of affirming the commitment to clear, accessible, innovative consultation – provides a useful practical starting point for assessing in simple terms the level and quality of intercultural consultation undertaken by Tower Hamlets Council through their statutory consultation process. Non-statutory consultation is not assessed on these terms because the research commenced after the completion of this process. The following matrix provides an interpretation of the Statement of Community Involvement through an intercultural lens. This is in part based on in-depth interviews and focus groups with consultees (or would-be consultees), and through an analysis of the Tower Hamlets LDF Evaluation Sheets (which were filled-in by consultees):

Statement of Community Involvement	Borough Consultation Action	Through an Intercultural Lens	Recommended Intercultural Action
Consultation and involvement will be well-planned and co-ordinated	Strong management and co-ordination to ensure the statutory consultation was conducted within the required timeframe, that it targeted hard-to-reach groups (such as BMEs), and that monitoring was undertaken throughout.	Low level participation evidenced from BMEs; with even lower level participation across different ethnic communities: i.e. consultees were not recruited to talk 'across' ethnic and cultural boundaries. Trust is underdeveloped – the consultation was not embedded within longer-term processes of intercultural engagement. Micro-consultation (such as with small intercultural groups) was not pursued.	**Target demographic profiles that are under-represented and build engagement processes that connect different ethnicities to each other by framing intercultural questions and asking these questions in 'intercultural spaces'.** **Continue to build strong networks of community engagement at a local level so that future consultation does not feel 'parachuted-in'; ensure those networks are not defined by ethnicity.** **Undertake multiple small-scale consultations in the spaces and places comfortable to consultees; through trust increasingly tempt consultees out of these towards intercultural spaces and places.**

| **Clear information will be provided** | Very thorough and well-co-ordinated dissemination of documents and promotional materials.

Navigable guidelines were provided unless English skills very poor.
Issues expressed with clarity by planners and colleagues at events.

Attempts were made to connect through minority media channels – such as Somali and Bengali radio and press, as well as trough the far more intercultural readership and participation base of youth-focused media.

The promotional DVD was effective in building optimism and engendering a sense of civic pride (with diversity a key contributor). | Language and tone of key documents and presentations were not readily accessible to those non-conversant with planning and development issues.

Translation services available in Somali and Bengali at most consultation events but under-used due to low levels of BME participation.

The very general and long-term nature of the issues under discussion meant engagement and relevance was hard to establish.

The planning restrictions enforced by the London Plan, ODPM etc. caused some confusion because consultees were unsure of the reach of their influence. It was therefore difficult to establish a tangible link between the consultation process and its planning outcomes.

A richer mix of media and ways of expressing the consultation themes and requirements would have drawn a more committed intercultural participant base.

The Reference Form was very difficult to interpret and respond to – it contrasted sharply with the language and presentational style used by planners and partners.

The DVD was overly celebratory and it did not explore how new intercultural communities are being developed – it had a multicultural approach. | **Bring translators to diverse communities rather than bring communities to translators.**

Highlight how consultation can bring short-term gain – with participation in consultation presented as a way of strengthening community and civic responsibility – with the intercultural nature of the community a key theme.

Be raggedly explorative in promoting consultation through a wider range of media – begin to pass ownership of the process to intercultural communities. |

Consultation and involvement will be held over a flexible timescale	The timescale was tight – as prescribed by law; but a flexible timescale of non-statutory consultation allowed for an embedding of partnership and engagement.	Non-statutory and statutory consultation was hampered due to the absence of a long-term engagement with local intercultural communities. The LAPs have not been in place for sufficiently long to build required levels of trust and robust intercultural networks. Specific consultation events could be varied in intensity, pace, time of day etc., as well as be linked together – building a longer-term consultation process with the same group of consultees (e.g. working with a mixed group over several consultation sessions to build trust, knowledge and intercultural dialogue).	**Build longer-term processes of engagement that statutory consultation can connect to – so it is seen as a natural intervention within strong ongoing intercultural dialogue.** **Work with the same consultees over a series of intensive workshops – to allow genuinely intercultural perspectives to emerge.** **Promote the connections and partnerships made through consultation as important interventions/outcomes in their own right.**
The purpose of each consultation and involvement process will be set out	This was clearly explained by planners and colleagues (such as from Planning Aid for London) through events, meet-the-planner initiatives and informal dialogue, with the limitations as well as the opportunities of the 'consultation impact' explained in a straightforward manner. Literature had clarity and crisp style, despite the complexity of issues being conveyed.	Language barriers limited the level of clarity for some consultees and potential consultees. This applies in particular to the consultation recruitment process – for some the purpose and relevance of the consultation was not clear due to the style and tone of the language, however simplified. The broad long-term approach of the LDF made it unclear on how 'local' or 'particular' the consultation should be. Tensions between micro local issues (such as litter on a particular street) and macro issues (such as the number of new houses), were played out in an often confused manner.	**Embed consultation as a natural progression from ongoing dialogue.** **Identify short-term interventions that can be made to show that the Council is listening and responding – these will sit outside of the LDF, but without micro actions, engagement with macro issues will be unfulfilling and undermined by a lack of trust**.

| A variety of methods will be used | The mix of events, dissemination techniques and means of engagement within these processes showed a willingness to be explorative to increase participation, engagement and trust. | Methods that capture intercultural dialogue were not explored, with a fairly rigid structure applied to workshops and promotional materials.

Limitations of resources and time reduced options for interactive methods (such as planning for real) and less structured social engagements (which are vital to establish trust and intercultural dialogue). | **Introduce a range of methods – including:**

- **Planning for Real through an intercultural lens – combining ethnicities and generations to engage with a physical proposition**

- **Be more radical – problematise existing norms (that may have been protected over many generations by the white majority) that relate to notions of 'aesthetically pleasing', 'safe', 'dynamic' etc.**

- **Engage explorative techniques where people are consulted in more 'random' contexts – such as on the street, in bars, at health centres, in schools etc. – i.e. in intercultural spaces and places.** |
| **Accurate records of responses will be kept and all exercises will be reviewed and monitored** | Thorough monitoring was undertaken post-hoc – including a Diversity Monitoring Form and LDF Evaluation Sheet.

Contact details were kept of participants – to allow future | A wider range of evaluation/monitoring methods will bring a stronger appreciation of how to connect more effectively with diverse consultees – e.g. the methodology used in this research can bring an understanding the complexity of responses to the consultation process (including | **Introduce evaluation and monitoring processes that request feedback in terms of people's cultural perspectives of the consultation process. This does not mean a request to link responses to ethnicity; rather it** |

	consultation and engagement and to test for geographical patterns. EqIA helped to establish the equalities issues for the non-statutory consultation process and established a framework for comparable monitoring for the statutory phase. Photographs of consultation events were taken and used to promote the process to local media – this is an important profile-raising and engagement process.	responses that involved resisting participation). Records of ad hoc comments presented in the consultation events were not systematically taken – e.g. participants were asked to write on post-it notes specific issues, and to stick these notes on to maps of the Borough – so as to link to specific locations. This was not recorded to strategically inform the LDF – there is a legal impediment to this where only Representation Forms were accepted as 'consultation'. Other recording methods – such as filming events, recording quotes etc. would help for future promotional purposes and, over the longer term, establish connections/trust with local people.	**means a request to situate the process in terms of its relevance to people's ways of seeing. This will engender intercultural responses.** **Gather and analyse ad hoc responses – build intercultural narratives of place that can have a currency for future processes of engagement and have a community-building role in their own right.**
Summaries of consultation and involvement findings will be made public	The Council's website is the main platform for this. Also, future consultation rounds will be predicated upon the presentation of previous consultation.	Previous summaries (such as from the non-statutory consultation process) did not display the rich array of complex responses that could be interpreted as intercultural (e.g. they did not present a specific finding as based upon the combination of diverse voices). This is an important message to portray if 'traditional' community boundaries are to be reconceptualised by a wider public. Issues of language, tone, and thus intercultural content, are as relevant to the summary of findings as the introduction of the consultation process.	**Promote findings – often as intercultural narratives – throughout the consultation process.** **Promote the consultation process as part of a longer-term, iterative process of gathering opinion, asking direct questions, and evaluating responses. Decision-making and implementation processes should be seen as part of a flow of engagement where the engagement itself is as important as the practical translation of engagement into policy action. This is a Corporate approach to interculturalism – as**

			introduced in Section 4.2 below. **Use different writing styles, promote in a much wider range of locations, and challenge local media to become the messengers for the process.**
Participants will be told of the results of programmes	The LDF sets out a very long-term process and thus updating of programmes directly related to the consultation process will be difficult. However, the Council does plan to make the link wherever possible between consultation and programme development – with the completion of the LDF the first major opportunity to do this.	Crucial is maintaining engagement so that local residents feel connected to the long-term development of the LDF and feel connected on their own terms (i.e. through an intercultural lens).	**Build networks of engagement – probably through the LAPs – where residents are informed of progress made.** **Hold networks as ongoing 'listening circles' where intercultural participants talk about their locality and community. This is not formal consultation but it is essential for building trust and for advancing local knowledge so that planners know how to frame questions in future consultation rounds.**
Where appropriate, local voluntary groups will be encouraged, and helped, to participate in exercises	The Council worked hard to engage a range of local voluntary groups from diverse communities. The LAPs brokered most of these relationships – with varying levels of impact across the Borough. Also vital was the role of COF in presenting *and translating* consultancy opportunities to its membership.	Many voluntary groups were made aware of the consultation process and encouraged to participate. However, further engagement and persuasion is often needed to prompt participation – especially in such a complex and long-term development process. This requires long-term and intensive engagement with diverse groups to relay the consultation process in a way that seems relevant and that promises some level of ownership (of the findings) and action (in response to the findings). A short-lived statutory consultation process is thus dependent upon much longer-term processes of	**Connect different groups together so that they are consulted across boundaries of ethnicity, faith, gender and generation.** **Support this intercultural dialogue outside of the formal consultation process – such as through the 'listening circles' introduced above.** **Consult in intercultural spaces and places – e.g. recruiting parents' groups, using**

		engagement that sit outside the reach of planning teams. It is important to go beyond existing community groups to reach intercultural networks and spaces: voluntary groups are often led by self-appointed leaders who perpetuate communities bounded by ethnicity. This consultation process showed limited success here, with little direct contact made with – for example – networks of sports participants, trades, educationalists etc. – where ethnicity is not the major signifier or binding factor.	**intermediaries such as health professionals, and exploiting internet networks**.
Training and guidance will be provided where it helps to get people involved	The Council tried to develop people's capacity to participate within the consultation events – such as by recruiting Planning Aid for London to convey in simple terms the consultation process. Little training and guidance was provided outside the mainstream of the consultation and it was not clear to potential consultees that support was provided (they were thus reluctant to get involved). The LAPs played an important role in 'building the picture' towards the eventual statutory consultation process, but direct training was not provided. The Community Empowerment Network has an important role to play here – supporting local people to have a constructive voice relating to future consultation processes.	Fundamental notions of 'planning' and 'consultation' need to be redefined through an intercultural lens to ensure they have relevance to local people. This requires actively working with local people to develop the methodology and to attune the language – this is a type of action-orientated training where local people feel they are being asked questions relevant to them and on their own terms. It is then the responsibility of planners and partners to translate this material 'back' to technically adequate findings/recommendations that can be used in the LDF. However, this process is challenged by the narrow language, tone and structure of the Representation Forms. Though expensive to facilitate, these forms should be presented as essential to the consultation process but only as part of a wider process of engagement that is valued more highly by the Council – i.e.	**Build cultural literacy programmes as part of ongoing engagement and consultation processes - i.e. workshops that build relationships between planners, partners and local residents/stakeholders regardless of whether a statutory consultation process is imminent.** **Utilise translators and culturally literate intermediaries to ensure that questions are framed appropriately and they help to build an intercultural narrative.**

		the relatively unregulated flow of ideas, issues and aspirations from an intercultural public. If people feel engaged within this wider process, they are likely to accept the inconvenience of filling-in a Representation Form: i.e. they feel valued, engaged, and that they are working in partnership over the long-term.	

4.2 Building Intercultural Consultation – Attending to Issues of Space, Time and Identity

Tower Hamlets Council should be commended for the serious intent shown in attracting a diverse base of consultees for its LDF statutory consultation and for embedding the consultation within broader processes of community engagement (such as through the LAPs). Moreover, credit should be given for the way the Council has sought to extend its engagement with local people and build genuinely intercultural dialogue. The recognition of diversity and the complexity of that diversity represents the crucial first stage in building progressive and meaningful engagement and consultation with a Borough that is to become more diverse, increasingly complex, and ever more starkly intercultural. However, as the above Matrix shows, the Borough is in the early stages of effectively reaching and thus recognizing and understanding the shifting coordinates of its intercultural population. In many ways, the statutory consultation process for the LDF came too soon, with processes of intercultural engagement (such as those driven by the LAPs) at a nascent stage, and with planners required to deliver a technically binding programme of consultation without the capacity or freedom to fully explore (and learn about) the potential of intercultural consultation for building an intercultural place. It is clear that in a year's time, the opportunity for intercultural consultation will be much stronger, with networks of engagement and dialogue more developed and strategic partners more sharply motivated towards an intercultural agenda.

The following should therefore be read as a series of outline issues to be incorporated directly into future consultation processes, based on the challenges and in some cases shortcomings identified through a focus on the just-completed statutory consultation process. However, it should also be read as a response to the many instances of good practice that are being developed in the Borough – by planners, the Consultation and Involvement Team, the LAPs, and a range of other partners. A fabric of intercultural consultation and engagement techniques are underway in Tower Hamlets; their effective coordination would have made the recent statutory consultation 'more intercultural'; their continued advancement and interconnection will help to establish dialogue that leads to trust that leads to progressive intercultural narratives which will effectively inform planning (and other policy) and allow Tower Hamlets to maximize the potential of its greatest asset: its cultural diversity.

A: Pursue Diversity:

> *"I don't see how why we should go along because it's all wrapped up and there ain't no way of expressing anything new"* **(Bangladeshi community worker).**

The statutory consultation undertaken for the LDF did not reach a consultee base with an ethnic diversity proportionate to the demographic profile of the Borough. While interculturalism is not the preserve of BMEs, it is dependent upon the cultural exchange between a range of ethnicities. Therefore, intercultural consultation is not possible without an intercultural consultee base.

For example, of participants at the LAP events and of those returning Representation Forms:

- **75% were White British, compared to a Borough proportion[26] of 42%.**
- **By contrast, 7% of participants were Bangladeshi, compared to a Borough proportion of 33%.**
- **5% were from other Asian categories, compared to a Borough proportion of 7%.**

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[26] All Borough figures are drawn from the 2001 Census.

- **3% were from Black African (including Somali) categories, compared to a Borough proportion of at least 4%.**

Intercultural consultation does not require a consultation profile to exactly mirror that of the Borough's demographic profile, but such disparities and under-representations do hamper generating intercultural dialogue that has resonance with senses of place across the Borough. Indeed, it is important to ensure that local variations in demographic profile are considered when targeting recruitment to the consultation process: each LAP area has a different demographic mix.

Put simply, efforts to recruit diverse groups to statutory consultation processes are dependent upon much wider approaches to community engagement. The statutory consultation process should be understood and read as a natural part of community engagement – it should be understood as a cultural practice and a way of exploring the alternative cultural ways of seeing of diverse local people. This requires sustained community-building techniques undertaken through the LAPs and for planners and colleagues to work closely over a longer period of time with community groups and intermediaries that may not be linked to the LAPs – opportunities to be explorative should always be factored in to timetables and budgets. Furthermore, issues of language, location, timing and tone – the *spatialities of intercultural consultation* – are very important in recruiting and continuing to engage BME consultees. These are discussed further below.

B: Language: Framing the Intercultural Question(s):

"The language is so dry and bureaucratic. It doesn't touch me. My mum wouldn't be able to read it anyway" **(Somali Youth Worker).**

Although Somali and Bengali translators were available at consultation events, they were not used. This is not simply because of the low-level attendance of BME consultees, but because the essence of the language used – the style of English – would have been very difficult to translate and thus people with limited English skills would have been unlikely to attend in the first place. This particularly applies to promotional materials, planning documents, and Representation Forms. The latter two are limited by a set of legal parameters where planning issues are required to be relayed using a specific form and style of language. However, there is scope for utilizing a range of different linguistic styles and tones (if not languages) to promote the consultation process, recruit consultees, and build broader processes of engagement. The Youth Consultation Event – The Matrix – did utilize different styles and approaches to attract consultees (not least through the adoption of 'The Matrix' title). The diversification of promotional tools and the casualisation of language used is likely to be more enticing to would-be consultees. Ownership and agency are key here – using intercultural intermediaries to set the tone and style of the language to a register recognised by target consultees.

Of additional significance is the way consultation questions are framed. This is a matter of language and substance. The statutory consultation process framed questions in terms of what planners wanted to find out from consultees. An intercultural approach to question-framing would ask the questions that local people – as intercultural agents – are asking. Local people can therefore be attracted to the consultation process *on their own terms.* The key skill then is for the planners to lever answers to the questions that they want answered. If a range of methods are applied, this should be possible (see below).

C: Location and Timing: Fleet-of-Foot Consultation:

"What sort of people go to a dusty hall on a cold night to be consulted without any sense that they are being listened to?" **(Local White British office worker).**

The statutory consultation process was overly tied to specific workshop events. These were held in a church hall, a community theatre space, and Council offices. These are not intercultural spaces, not least on weekends or evenings. The location of a consultation event transmits a significant message to potential consultees that can be persuasive or dissuasive of the value in participating. Too often, it was dissuasive. This is because trust and credibility are yet to be established with the intercultural communities of the Borough. They take a long time to establish; processes of engagement need to be reconceptualised as a long-term journey towards building trust and credibility that ensures people willingly participate and constructively contribute. This requires that people are engaged with (and eventually consulted) in spaces and places comfortable to them; planners and partners need to 'go to them to understand them', to 'loiter with intent', and to be innovative in projecting new consultation interfaces. For example, techniques in Australia have used GPs and teachers as consultation intermediaries because they meet and engage with diverse local populations in spaces where such populations more readily visit and - crucially – mingle and connect. In Tower Hamlets, processes of engagement and involvement (mostly through the LAPs) have included home visits (with a translator), consultation meetings at Bengali women's tea mornings, and lively debates at youth centres. This should be supported further.

Such processes – in the *comfort zones* of and at convenient times for diverse residents and stakeholders– are pitched to build interaction and lead towards trust. This is a slow process, but gradually people can be attracted into other locations and at other times because they feel engaged and listened-to. Sharp and targeted statutory consultation cannot build these processes of engagement, so it is important that the Borough and its partners continue to build engagement and interaction across different communities so that when communities need to be consulted, they are ready and willing to respond – even if this means trekking to a dusty hall on a cold night.

D: Intensity and focus: Towards Mixing Methods:

"I understand that time is of the essence, but there were a lot of complete issues to discuss in a short time. We were not really given time to thrash things out! I'm worried that this is just lip service" **(Official LDF Evaluation Sheet response).**

Just as it is important to question the value of holding consultation workshop events in non-intercultural spaces, it is important to examine the efficacy of using workshops as the key consultation tool. LDF Evaluation Sheets and interview feedback showed that the workshops were for some participants too short, prescribed, inflexible and inconclusive. While it is clear that workshops are an efficient means of attracting relatively large numbers of people to the 'consultation table', it is equally clear that without a flexible methodology that allows workshops to be re-routed around intercultural agendas, and without a range of complementing intercultural methodologies, then their value is limited. Indeed, for some consultees the workshops have damaged their impression of the Council and introduced a cynicism of the consultation process that was not previously present. Workshops can form a valuable, indeed underpinning, role in processes of consultation and engagement, but only if they:

- Allow time for participants to build an identification with and knowledge of the issues being discussed. This can take a long time and may require more than one workshop and a range of supporting materials. The importance of embedding consultation within longer-term processes of engagement is once again key.

- Frame questions to maximize participation and interest; then re-frame the questions to ensure that the technical requirements of the consultation exercise are fulfilled. Participants will only 'gather round' and respond to a question if they feel engaged on their own terms.

- Introduce a mix of stimuli to maximize response and to reposition consultees along intercultural axes. For example, Planning for Real helps consultees to visualize transformation; the use of maps (and mental map techniques) prompts a rush of differently specialized senses of place; and role-playing can work to transport consultees into the cultural position of a neighbour.

- Mix groups to ensure they are not mono-ethnic or of the same age or gender, and keep mixing groups as the workshop continues. This is essential to position consultees around a specific set of questions as a collaborative, intercultural form of engagement. For example, a group consisting mainly of local Bangladeshi men of a similar age will propose a set of planning solutions that differ markedly to a more mixed group. The constant mixing of groups allows planners to see the multiple intercultural perspectives possible for what might at first glance have seemed a narrow set of issues/questions.

- Complement workshops with a range of other approaches. This might include follow-up interviews with participants who perhaps took a long time to build the confidence to get involved yet seemingly held an intercultural position that did not settle comfortably within the boundaries of existing notions of community (such as 'Bangladeshi', 'youth', 'White', 'elderly'). It might also include using wholly 'alternative' approaches such as theatre companies to dramatise new points of engagement.

- Maximise the visibility of the consultation across a range of media. This includes minority radio and newspapers; it includes business publications and trade journals; and it includes different promotional 'surfaces' – such as installing stalls in empty shop units, 'flyering' events, and using notice boards. The more unlikely the location, media or surface, the more local people will be convinced of the Borough's dedication to engagement and the value it places on connecting with them on their own *intercultural* terms.

- Cut across professional boundaries over the long term: Planning is a profession too often siloed-off from other associated professions – such as in economic and cultural development, regeneration, education and social care. It is vital that planners work cross-departmentally prior to statutory consultation processes so that they can build their knowledge of the intercultural reality of the location they are seeking to plan for. It is also important that they work to engage outside of recognised partnership structures – i.e. the LAPs should not be the sole means of community contact (for example many housing officers can offer very acute readings of the local intercultural landscape).This is of particular importance given the fluidity of staff turnover in the planning profession and, in Tower Hamlets, the high proportion of new-to-the-Borough Antipodean planners. Standardised processes of engagement and consultation within an 'unknown intercultural landscape' will not engender intercultural perspectives or an appreciation of how to apply such perspectives through planning policy.

E: Learning to Read: Intercultural Literacy as a Prerequisite to Local Knowledge:

***"I'm not certain that anything I say will be interpreted to mean what I want it to…"* (Serbian fashion designer, E1).**

Intercultural consultation – where diverse communities collaborate in their response to a consultation question – requires intercultural interpretation. As indicated above, this is not currently well-developed in Tower Hamlets because the positionality of the planner or policy-maker is not deconstructed and analysed, meaning that intercultural narratives are read from a relatively non-intercultural perspective. Longer-term engagement that cuts across disciplines, methodologies and different intercultural communities, will increase intercultural literacy and enable planners to effectively interpret (and build collaborations to assist with interpretation) the intercultural complexity of the local population and thus the way this complexity can be translated into a practical planning agenda. Increased intercultural literacy will in turn assist planners to re-frame consultation questions through an intercultural lens, to appropriately target their consultation promotional materials, and to sensitively engage in places and at times most likely to engender intercultural dialogue based on trust and understanding. Intercultural literacy cannot be reached over the short-term and it is dependent upon a determined corporate approach by the local authority and its partners that promotes intercultural engagement as a crucial step-by-step route to effective intercultural consultation.

5.0 Establishing New Forms of Engagement and Consultation: An Opportunity for Tower Hamlets

Increased accessibility and usability are fundamental tenets of the 2004 Planning Act. Underpinning this is a commitment to equality issues: "(E)quality of opportunity must run through the planning system as one of the guiding principles" (ODPM 2004). Yet issues of equality are rarely interpreted by planners and associated professions as issues of interculturalism. Many planners and associated professionals remain preoccupied by a cultural politics of multiculturalism. This is despite the contemporary reality of British cities being fused by new, syncretic, (de)racialized identities constantly emerging, translating, and reassembling. Planners are operating in a landscape infused with a 'spatialized politics of identity' (Keith and Pile 1993), reconfigured by the de-essentialism/re-negotiation of 'race' and inauthenticity/appropriation of 'tradition' (see for example Gilroy 1994; Jacobs 1995; P. Crang 1996; Lury 1996), and the concomitant multiplication of new ethnicities and new racisms (see for example Back 1996). Planners are operating in an intercultural flux of multiple interwoven communities and ceaselessy renegotiated positionalities. It is time therefore that planners took note.

In Tower Hamlets there is a realization that processes of engagement and consultation need to be changed if they are to even momentarily grip the fluid intercultural dimensions of the Borough. Indeed, there is an acceptance that planners need to re-frame their questions, realign their partnerships and even reflect on their own intercultural perspectives. This includes adopting a practical and methodological agenda that problematises notions of 'community' and the roles of existing community representatives, mixes the consultee interface through truly intercultural locations such as schools and through GPs, diversifies the intermediary team, and coordinates over the longer term with local partners. It also includes building the statutory consultation process into existing consultation processes and (more importantly) processes of engagement.

However, local planners have a limited role and influence within the overall policy and development process and they are tasked with very a specific, often technical statutory consultation remit with constraints on style, content, timeframe, resources and points of reference. In many ways, to reach a position where intercultural consultation is undertaken effectively and where findings are interpreted through an intercultural lens based on a consummate level of intercultural literacy, it is not solely the planners that need to change: it is the *entire corporate structure, approach and style of the local authority.* Tower Hamlets – through its Beacon Status and evidenced through the commissioning of this research – is changing its style and approach. The focus on diversity as a major asset ensures that decision-makers are intent on grappling with their intercultural landscape, building intercultural literacy and developing appropriately intercultural policy.

This is a long-term agenda that far outstrips the temporary intervention of a statutory consultation process. For Tower Hamlets to maximise its potential as an intercultural place – as a progressive Global City District – it needs to reconceptualise engagement and consultation as a *permanent process* where iterative social relations of the intercultural landscape become increasingly legible and navigable to planners and associated professions. The Borough needs to establish a blend of responses where 'small things' are acted upon as a way of building trust with regard to the macro LDF agenda. The Borough needs to establish meaningful relations that stretch beyond self-appointed community leaders and relatively vocal LAP members to the multiple 'under the radar' socio-cultural relations, asking new questions on 'their' terms. And the Borough needs to commit capacity and resources to these multiple interfaces of engagement and consultation so that the next time planners are tasked with undertaking a rapid-fire statutory consultation process, they can do within a series of complex though established intercultural relationships and partnerships that the Borough has built as part of a corporate intercultural strategy. The task now for Tower Hamlets is to build this **Strategy of Intercultural Engagement** and thus ensure that its intercultural population really does, in line with the Regeneration Strategy, *create and share* the Borough's prosperity and cultural capital.

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