



**Roman Road Bow Neighbourhood Forum**

# **Roman Road Bow Neighbourhood Plan 2020-2031**

**PUBLIC Draft**

**V1**

**October 2020**

## **Welcome from the Chair of Roman Road Bow Neighbourhood Forum**

In February 2016 when Roman Road Trust first tabled the idea for preparing a neighbourhood plan at a public meeting, it wasn't the threat of large scale development that brought us together, but the opportunities that we all saw for engaging in a neighbourhood planning process that would create the means to bring new life to our high street and green spaces; to raise awareness about what is valuable about the community we live in - its ethnic diversity, its history of championing social change and the heritage of some of its architecture - public buildings, bridges, houses and pubs. We also recognised that the neighbourhood has some challenges: the impacts of traffic on air quality are also making walking and cycling less appealing; a shortage of genuinely affordable and good quality homes; a narrow range of shops, empty retail units and a struggling market. A neighbourhood plan could help to direct funding to address some of these challenges.

The Covid-19 pandemic has shone a spotlight on fissures that were already present in our neighbourhood's fabric - more retail units are under threat, there is less funding available to improve open spaces and community facilities, at a time when these have become more valued. At the same time, wider issues of climate change create local consequences that the plan can help to address.

This first draft of the Roman Road Bow Neighbourhood Plan is an opportunity to test with the community whether the policies and actions proposed here can withstand the added pressures facing our neighbourhood, and still shape and safeguard its physical fabric. We welcome your comments and feedback on the draft policies and actions we have set out, that are drawn from what you have told us is important over the last two years.

Thank you for your support and engagement so far

Alex Holmes

Chair Roman Road Neighbourhood Forum Committee

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## List of policies

## Introduction

### 1.1 Purpose of the plan

This is the Neighbourhood Plan for the Roman Road Bow Neighbourhood Area over the period from 2020 to 2031. The principal purpose of the Neighbourhood Plan is to guide development within the Neighbourhood Area. It also provides guidance to anyone wishing to submit a planning application for development within the Area. The plan defines a vision for the Neighbourhood Area focussing on the local economy, connectivity, open space, heritage, community facilities and housing, and sets out how that vision will be realised through planning and controlling land use and development change over the plan period.

The Covid-19 pandemic has seriously impacted Bow and the local economy, whilst also demonstrating the resilience and cohesion of our local community. We believe the neighbourhood plan offers a framework that will help shape a sustainable future for Bow, whilst respecting our rich heritage.

### 1.2 Structure of the plan

The Plan comprises a vision for the area, and a set of objectives in thematic chapters. Each of the objectives presents a summary of issues followed by the different policies, actions and aspirations. These are respectively accompanied by their conformity with other policies and a justification.

The planning policies are in green boxes. Some of the Neighbourhood Plan policies are general and apply throughout the Plan area, whilst others are site or area-specific. In considering proposals for development, Tower Hamlets Council will apply all relevant policies in the Plan. It is therefore assumed that the Plan will be read as a whole, although some cross-referencing between Plan policies has been provided.

The process of producing the Neighbourhood Plan has identified a number of aspirations and actions which have not been included in the policies' sections. This is because these are not specifically related to land use matters and therefore sit outside the jurisdiction of a Neighbourhood Plan. These aspirations and actions will be addressed outside the Neighbourhood Plan process and are shown in yellow boxes.

**Green box = Roman Road Bow neighbourhood plan policies**

**Yellow box = Community aspirations and actions**

### **1.3 Preparation of the plan**

The Plan has been prepared by the community through the Roman Road Bow Neighbourhood Forum (RRBNF) Committee, formed in February 2016 after the first Neighbourhood Forum meeting, where the proposal to prepare a neighbourhood plan was put forward and discussed.

Tower Hamlets Council, as the local planning authority, designated the Roman Road Bow Neighbourhood Planning Area in February 2017 and the Roman Road Bow Neighbourhood Planning Forum, (the body responsible for developing the plan), in August 2017.

The different topic areas in the Plan reflect matters that are important to the Area's residents, businesses and community groups. RRBNF Committee have sought to engage the local community at each stage of the preparation of the plan. See the accompanying Community Engagement report that forms part of the evidence base supporting the Plan's proposals and policies.

### **1.4 Wider policy context**

This Neighbourhood Plan has been prepared in accordance with the Town & Country Planning Act 1990, the Planning & Compulsory Purchase Act 2004, the Localism Act 2011 and the Neighbourhood Planning Regulations 2012 (as amended).

The Neighbourhood Plan represents one part of the development plan for the neighbourhood area over the period 2021 to 2031, the other parts being the Tower Hamlets Local Plan 2031 and the London Plan 2016 (until it is superseded by the emerging London Plan 2019). The National Planning Policy Framework, representing national planning policy, is also a material consideration.

#### **1.4.1 National Planning Policy Framework**

The National Planning Policy Framework (NPPF) sets out national planning policy and provides general guidance on a wide range of planning matters. It includes a presumption in favour of sustainable development, i.e. if a planning application is made which is considered to be sustainable development then there has to be good reason for rejecting the proposals. Where there are no policies relevant to the application, either within the Neighbourhood Plan or other relevant and up-to-date plans for the area, then Tower Hamlets Council should grant permission unless material considerations indicate otherwise.

The NPPF outlines the purpose of neighbourhood planning: *"[it] gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development..."* (p10, para. 29, NPPF 2019). The NPPF establishes the framework for developing local plans and neighbourhood plans. It states that *"Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area."* (p5, para. 9, NPPF 2019).

#### **1.4.2 'Intend to Publish' London Plan 2019**

A neighbourhood plan must be in general conformity with the London Plan. The London Plan contains detailed planning policy which must be applied, where relevant, to proposals in the Roman Road Bow Neighbourhood Plan Area unless there are very good reasons for not doing so.

The Covid-19 pandemic has delayed the publication of the new London Plan although the final document is expected to be published in 2021.

The Roman Road Bow Neighbourhood Plan Area falls within the London Plan's Strategic Areas for Regeneration. Roman Road (East) has been classified as a district centre, with low commercial growth potential and incremental residential growth potential (p555, Annex 1, Intend to Publish London Plan).

#### **1.4.3 Tower Hamlets Local Plan 2031**

Tower Hamlets Local Plan 2031 (para 17.9) concerning sustainable places acknowledges the contribution of neighbourhood plans: *"Neighbourhood plans may also shape the future planning of these areas at a neighbourhood level and developers and other relevant parties will need to consult with neighbourhood forums to inform development proposals in the neighbourhood planning areas."*

The Roman Road Bow Neighbourhood Plan Area falls within the Central sub-area (p199, Tower Hamlets Local Plan). The Plan Area sits within Bow, one of nine character areas within the Central sub-area. There are no site allocations within the Plan Area or in close proximity.

There are 20 wards in Tower Hamlets local authority boundary. The Neighbourhood Plan Area sits within two wards - Bow East and Bow West.

#### **1.5 Monitoring the Plan**

Roman Road Bow Neighbourhood Forum, as the responsible body for the Neighbourhood Plan, will maintain and periodically revisit the Plan to ensure relevance and to monitor delivery.

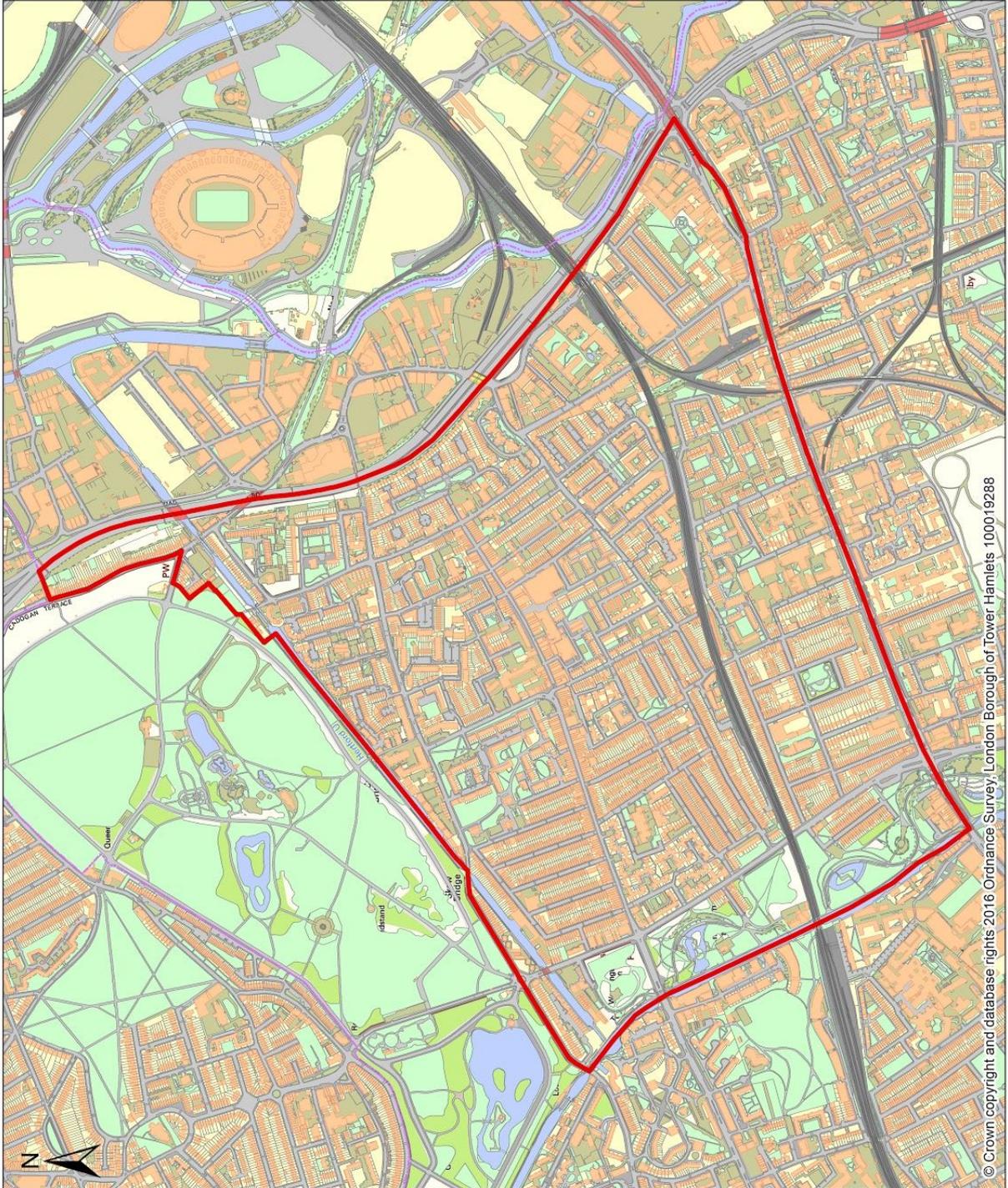
#### **1.6 Roman Road Bow Neighbourhood Plan Area boundary**



# ROMAN ROAD PROPOSED NEIGHBOURHOOD BOUNDARY

**LEGEND**

Proposed  
Neighbourhood  
Boundary



Scale @ A4: 7,500  
0 0.1 0.2 0.4  
Kilometers

Created by GIS Team  
LONDON BOROUGH OF TOWER HAMLETS  
Date: 24/10/2016

## Local context

The Neighbourhood Plan Area is located between Globe Town to the west, Victoria Park to the north, Mile End to the south and Fish Island and the Olympic Park to the East. The A12 Blackwall Tunnel Road cuts through Bow north to south. Fish Island to the East is in a separate planning authority, the London Legacy Development Corporation (LLDC), formed in April 2012 to secure the legacy of the 2012 Olympic Games.

The Neighbourhood Plan Area is mostly similar in boundary to the area identified as “Bow” in the Tower Hamlets Local Plan Sub Area 2: Central.

### 2.1 History of Bow

#### 2.1.1 Economic character

London’s docks had driven employment in Bow until their decline after the second world war and closure in the late 1960’s. The docks represented east London’s connection with trade and industry (The Bryant and May match factory, which closed in 1979, became one of East London’s first urban renewal projects in 1988). For over 100 years, the economy of Roman Road Bow has been shaped by The Roman Road Market, which has been an important employer in the area, sustaining local retail and businesses. The market attracted visitors from across London, but has been in decline in recent years.

#### 2.1.2 Urban character

The varied character of street patterns, open spaces and homes in the Neighbourhood Plan Area reflect Bow’s rapid growth and decline over 200 years. Georgian houses on Coburn Road and Tredegar Square are examples of the prosperity in Bow during the 1700’s. The Victorian period saw rapid industrial growth with new road, rail and waterway infrastructure that today are assets as well as barriers to connectivity. Victoria Park, built in 1845 as a lung for the local population to escape the polluted east end air, is still a popular and cherished green space. Post-war slum clearances saw the development of housing estates such as the Ranwell Estate and the Malmesbury Estate. Their layouts created new open spaces, many of them under-used. Nearly 1,700 homes were built in the wider area, including the Neighbourhood Plan Area, between 2010-15.

With little available land, the Council has focused on infill sites, demolishing Council owned buildings which no longer serve their original purpose, and re-building on these sites. Between 2015-19 planning approval was granted to almost 170 new homes, including 106 age-restricted flats<sup>12</sup>, four townhouses<sup>3</sup> and 32 dwellings for market sale to cross-subsidise some of the age-restricted developments.

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<sup>1</sup> PA/15/01601/A1

<sup>2</sup> PA/18/00092/A1

<sup>3</sup> PA/19/00346/A1

Council projects in 2020 to develop infill sites propose 28 new homes.<sup>4</sup>

### **2.1.3 Social and cultural identity**

Bow has a rich history exemplifying the East End spirit of determination and resilience. It has been home to social reform movements such as the Suffragettes, and for centuries immigrants have settled here shaping the area's unique local character and identity.

Artists have established themselves in Bow since the East London Group in the 1920's, and continue to find a place here, producing and exhibiting their work. In Hackney Wick there is still a thriving community of artists, with 610 studios and up to five artists per studio. The LLDC, in preparing its plans for building new homes in Hackney Wick and Fish Island, realised they needed to accommodate growth without displacing the area's existing working and creative community. In writing the neighbourhood plan for Bow, we too have sought to ensure we value and conserve our rich and diverse heritage, whilst supporting high quality, sustainable development.

## **2.2 Profile of the community today**

2011 Census data<sup>56</sup> showed the population of Bow East and Bow West wards was 27,720. Projected growth for 2016-2026 for part of Bow East, which includes Fish Island, is over 51%, with a slight fall predicted for most of Bow West. This is because there is little housing development planned in Bow West, while at the same time the average household size of the existing population is expected to fall as the population ages.

### **2.2.1 Bow West Ward**

- 41% of residents were Black and Minority Ethnic (BME). This proportion was lower than the borough average of 54%.
- Residents of Bangladeshi origin accounted for 21% of the population, also a lower proportion than the borough average.
- The population aged 65 and over was almost 2% higher than the borough average, at 8%, with the under 16's forming 19% of the local population.
- 33% of the ward's households were owner occupied. As a result, there were a correspondingly lower proportion of households who lived in socially rented accommodation (39%) or privately rented accommodation (28%).
- Renters as a whole account for 66% compared to the borough average of 72%.

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[https://www.towerhamlets.gov.uk/ignl/housing/New\\_homes\\_programme/Future\\_projects.aspx](https://www.towerhamlets.gov.uk/ignl/housing/New_homes_programme/Future_projects.aspx)

5

[https://www.towerhamlets.gov.uk/Documents/Borough\\_statistics/Ward\\_profiles/Bow\\_West.pdf](https://www.towerhamlets.gov.uk/Documents/Borough_statistics/Ward_profiles/Bow_West.pdf)

<sup>6</sup> [https://www.towerhamlets.gov.uk/Documents/Borough\\_statistics/Ward\\_profiles/Bow\\_East.pdf](https://www.towerhamlets.gov.uk/Documents/Borough_statistics/Ward_profiles/Bow_East.pdf)

### 2.2.2 Bow East Ward

- 40% of residents in the ward were BME, 14% lower than the borough average of 54%.
- Residents of Bangladeshi origin accounted for 17% of the population, a lower proportion than the borough average.
- The population aged 65 and over was almost 1.5% higher than the borough average, at 7.4%, with the under 16's forming 17.5% of the local population, 2% lower than the borough average.
- There was a higher than average proportion of socially rented properties and a higher than average proportion of private rented properties in this ward accounting for 73% of all properties in the ward.



Welcome banner outside Chisenhale School

### 2.3 Opportunities and challenges in Roman Road Bow

A series of public engagement events run by the RRBNF Committee in 2018 and presented in more detail in the supporting evidence material, highlighted serious challenges that are described below.

#### 2.3.1 The local economy

**Opportunity:** The Roman Road has an historic street market and a number of long established family businesses, shops and eating places. There are also a number of popular pubs such as Eleanor Arms, Lord Tredegar, Morgan Arms, The Coburn and the listed Palm Tree in Mile End Park.

**Challenge:** There are a substantial number of empty retail units, particularly on Roman Road. Residents have commented on the narrow range of shops, lack of restaurants and almost no evening economy. The historic street market, while popular with some residents, no longer has the wider draw that it used to.

Heavy traffic along St Stephen's Road and Tredegar Road discourages people from visiting the area. There are other underused local shopping parades, such as around Malmesbury.

### 2.3.2 Transport and connectivity

**Opportunity:** The area has good transport connections, with Mile End and Bow Road tube stations and Bow Church DLR stations on its southern boundary, and is well served by bus routes.

**Challenges:** There are limited cycle routes and cycle parking through the neighbourhood plan area. Many residents highlighted the poor pedestrian and cycle connections, such as Tredegar Road/A12 junction, as barriers to accessing the facilities of the Olympic Park.

The pedestrian environment is considered poor by many residents, who highlighted speeding commuter traffic, pollution and congestion as issues across the area. The market section of Roman Road is a one-way street on non-market days, making it less attractive for pedestrians.

Mile End and Bow Road underground stations lack step-free access.

Fish Island has its own Area Action Plan, which highlights poor connectivity with the surrounding area: *"Enhancing connectivity between Fish Island and its surroundings to make a genuinely joined up place in East London will be essential to secure sustainable development and ensure that the communities in Tower Hamlets can enjoy the benefits flowing from the Olympic Legacy and Stratford City developments."*<sup>7</sup>

### Figure 2.1 Showing the poor connections between the plan area and Fish Island<sup>8</sup>

### 2.3.3 Public realm and green spaces

**Opportunities:** The Neighbourhood Plan Area is bounded by excellent large parks including Victoria Park to the north, Mile End Park to the West and The Olympic Park to the East. The Hertford Union canal runs along the edge of Victoria Park, which links with the Regent's canal that runs along the edge of Mile End Park. All of these provide much appreciated amenity spaces.

Bow is privileged to have Growing Concerns garden centre locally, which can assist with the design and planting of gardening projects.

**Challenge:** Mile End Park is under-used, and maintenance is under-resourced. There is anti-social behaviour along the canal towpath and in the park. Green spaces in

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<sup>7</sup> Page 32, Fish Island Area Action Plan, adopted Sep. 2012

<sup>8</sup> Page 33

<https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/LBTH-Fish-Island-AAP-Submission-Version-web-version.pdf>

housing estates are often under-used and unloved. Some parts of the area lack any green spaces or trees.

### **2.3.4 Heritage**

Opportunity: Bow has a wealth of history, including its industrial and suffragette past.

Challenges: The fragile character of Roman Road has been eroded in the past by unsympathetic alterations and re-building. Conservation areas sometimes lack detailed guidance over where extensions may be appropriate, including guidance on form, colour, texture, profile, materials, massing, fenestration, buildings lines, street frontages, scale, proportion and architectural detail.

Heritage assets, such as historic canal bridges, are often poorly maintained with a lack of clarity over who is responsible for them. At the Former Coborn Station on Coborn Road, buddleia overhangs the entrance, and the blue plaque that was above the main entrance, is no longer there.

### **2.3.5 Community facilities**

Opportunity: There are several well-loved cultural facilities such as Chisenhale Studios and Bow Arts Trust, and a variety of places of worship, including Bow Church, commissioned in 1311.

Challenges: Some community facilities are underused such as the Ecology and Arts Pavilions in Mile End Park. The number of general community spaces and halls is falling due to increasing rents. Out of school children's and youth provision in the area is sparse and patchy. A survey of 54 students at Morpeth School concluded:

*'Regarding the desire for new facilities, youth clubs were mentioned by 22% of students, contrasting with only 6% saying they attend one. The fact that 65% of students mentioned leisure facilities of some kind demonstrates a clear desire for more or better youth leisure provision.'*

### **2.3.6 Housing**

Opportunity: The fine grain and low-rise character of the area is appreciated by residents, who wish this to be conserved.

Challenges: There is a lack of genuinely affordable housing, alongside a piecemeal approach to development, including infill development. This is due, in part, to the lack of available development sites, and the existing dense urban grain of the area.

Increasing house prices are prohibitive for many, and there is a need for more housing for people on modest incomes and for larger families.

A March 2020 Housing Needs Assessment for Bow concluded:

*"6.7 Unless there is an increase in the vacancy rate from the existing affordable housing stock, the flow of unmet affordable need is an average of 86 dwellings per annum in Bow East and an average of 97 dwellings per annum in Bow West over the*

*5-year period to 2024, a total of 183 per annum. The capacity of affordable housing in the wards would need to double in approximate terms to generate sufficient supply on an annual basis to meet this requirement.*

*6.8 Nearly half of this requirement would need to be in the form of 1-bedroom flats and apartments. 3 and 4-bedroom affordable homes should also be built in smaller quantities. Building of 2-bedroom homes should be resisted as the existing capacity of 2-bedroom homes in the wards is significantly higher than the requirement.”*

**Figure 2.2 Housing developments in Bow 2000 - 2015 (© Tabitha Stapely)**

## Vision and plan objectives for Roman Road Bow

Our vision is for a diverse community with a thriving local economy, high quality, affordable homes set among green streets, beautiful public spaces and well preserved heritage.

The following objectives underpin the vision for the Roman Road Bow Neighbourhood Area and support the plan policies:

### **Objective 1: Thriving high street and local economy**

By 2031, Bow neighbourhood offers a wider variety of shops and other amenities. There are fewer vacant units, Roman Road having adapted its offer to reflect the range of different needs of the population, providing a more lively and safe local centre throughout the day and into the evening. Overall, retail is a smaller part in the local economy, the district centre having a broader range of uses and activities, including, the charitable sector, leisure, arts and culture, health and social care services. Modern local landmarks such as Onyx House and Bow House Business Centre are fully occupied and provide much needed space for businesses and other local groups.

### **Objective 2: Green streets that encourage walking and cycling**

By 2031, we have a proper network of pedestrian and cycle connections and supporting infrastructure such as secure short-term cycle parking. The area is more accessible to get to and move around in. Liveable Neighbourhoods funding has delivered a network of attractive green routes that are safe to use. Instead of driving, people choose to walk and cycle, reducing local traffic volumes, associated air pollution and parking issues.

### **Objective 3: Beautiful public spaces**

By 2031, investment has transformed the public realm by creating green and de-cluttered local streets. Popular play areas designed to encourage free play and a love of nature now replace former neglected spaces. The former car park on the corner of Roman Road and St Stephens Road plays a valuable role as a community space. The improved public realm has helped to reduce anti-social behaviour. Residents and businesses are proud of their high quality, litter-free environment - fly-tipping is no longer tolerated following vigorous campaigning and local action by the community.

### **Objective 4: New life for our heritage**

By 2031, an updated Bow Heritage Trail links historic buildings, parks, galleries, pubs and restaurants, street market and shops along pedestrian friendly routes. Undervalued heritage assets such as the Three Colts and Parnell Road bridges over the Hertford Canal

are better conserved. Our precious heritage resource is protected and enhanced to ensure that it continues to be appreciated and enjoyed by future generations.

**Objective 5: High Quality, Affordable Housing**

By 2031, new developments over the last decade integrate well with existing communities, retaining the character of local neighbourhoods without destroying locally listed assets. A majority of the homes are low carbon homes. Roman Road CLT has pioneered a few affordable and well designed community-led housing schemes around Bow. Incremental, small scale housing projects over time have created a greater variety of housing types. These housing schemes reflect the local housing need and promote community cohesion very successfully.

**Objective 6: Resilient and well-networked community infrastructure**

The existing network of community groups running facilities - be it grassroots organisations, child and youth provision, arts and performance programmes and places of worship - form a community consortium where opportunities for provision of new facilities or future expansion of existing facilities can be agreed across the Neighbourhood Plan Area. The consortium's remit will provide a clear structure and programme for distributing funding and building a resilient infrastructure of community facilities that meets the needs of the local population into the future.

## Objective 1: Thriving high street and local economy

*By 2031, Bow neighbourhood offers a wider variety of shops and other amenities. There are fewer vacant units, Roman Road having adapted its offer to reflect the range of different needs of the population, providing a more lively and safe local centre throughout the day and into the evening. Overall, retail is a smaller part in the local economy, the district centre having a broader range of uses and activities, including, the charitable sector, leisure, arts and culture, health and social care services. Modern local landmarks such as Onyx House and Bow House Business Centre are fully occupied and provide much needed space for businesses and other local groups.*

### 4.1 Summary of current issues

#### 4.2 Encouraging flexible use of premises

##### 4.2.1 Key issue

Shop units on Roman Road are under-occupied, and many are in poor condition. High rents combined with business rates and other overheads make sustainability for single use small businesses very challenging.<sup>9</sup>

##### 4.2.2 Policy

#### Policy LE1 Encouraging flexible use of premises

Development proposals for commercial, business or service activities (Class E) should be designed so they can be used or easily adapted for use by a range of different occupiers within Class E.

Development proposals for commercial activities are encouraged where they:

- offer space on a flexible, short term and/or easy-in, easy-out basis
- provide communally-shared facilities
- address the needs of those working in the creative industries

##### 4.2.3 Conformity with other policies

#### Tower Hamlets Local Plan 2031, Policy D.TC2

*“Protecting retail in our town centres’ requires development in all district centres to contribute towards achieving a minimum of 60% of ground floor units as A1 (retail) use. This is distinct from cafes and restaurants (A3), pubs and bars (A4) and hot food takeaways (A5). It also states development ‘should contribute to the activity and vitality of the town centre by offering space to meet and relax, subject to A1 (retail) units not falling below the threshold set out above.”*

#### Tower Hamlets Local Plan 2031, Policy D.TC7 Markets

*“1. Development proposals impacting existing markets will only be supported where:*

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<sup>9</sup> Evidence base , paragraph 4.4

- a. they demonstrate that the overall quality of the market and public realm will be improved;
  - b. the capacity for existing numbers of pitches is maintained, and
  - c. they protect or re-provide appropriate storage and servicing facilities.
2. Proposals for new markets, including farmers' markets and 'streetfood' markets, will be encouraged. They will be directed to Major, District or Neighbourhood Centres and should enhance the centre's existing offer and contribute to vitality and cohesion."

**The Town and Country Planning (Use Classes) [...] Regulations 2020<sup>10</sup>** states that buildings and land previously classed as shops, financial and professional services, restaurants and cafes or businesses will be treated as being used for the single class E, 'commercial business and service'.

When new buildings are built for a use under Use Class E, they need to be constructed with adaptability (in terms of use) in mind.

New local planning guidance emphasises the importance of flexible and shared workspaces and affordable workspaces being provided by specialist providers:

**Planning Obligations: SPD, draft for consultation, Tower Hamlets Council, Mar 2020**

*"Workspace can take a range of forms, such as flexible or shared workspace where tenants have a flexible agreement through a workspace provider. It can also include discounted floorspace for one or more SMEs, or shared industrial workspace for businesses or artists. The Council's preference is for developers to deliver the Affordable Workspace, via a specialist workplace provider...."* (para 5.52, p29)

#### **4.2.4 Justification**

The need for local flexible and affordable workspace is demonstrated by the Mainyard Studios 2020 application to construct music studios and creative workspace in the garden of 35-37 Bow Road, E3 2AD<sup>11</sup>

#### **High Streets and Town Centres in 2030 (2019)<sup>12</sup>**

This report identifies major trends that have made it harder for local high streets to thrive, including the growth of online shopping. Four structural issues were identified:

- Too much retail space, with retail acting as the main anchor for many high streets.
- Fragmented ownership, which makes working collectively with local businesses very hard.
- Retailers' high fixed costs: business rates and rents. The retail sector accounts for 5% of Gross Domestic Product (GDP) and pays 25% of business rates.

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<sup>10</sup> <https://www.legislation.gov.uk/uksi/2020/757/made>, para 7

<sup>11</sup>

PA/20/01845/NC

<sup>12</sup> <https://publications.parliament.uk/pa/cm201719/cmselect/cmcomloc/1010/report-summary.html>

- Business taxation. Government action is needed to level the playing field between online and high street retailers.

*“Achieving the large-scale structural change needed will require an intervention led by the local authority, using all its powers and backed by cross-sector collaboration. However, given the financial pressure faced by local authorities, central government funding will be needed for this, as well as significant private sector investment.”* (paragraph 54)

The Future High Streets Fund is an example of the sort of intervention needed at a national level. The Covid-19 pandemic only strengthens the case for such National Government intervention, supported by committed, consistent local authority action.

### **Q Consult Report, Queen Mary College students**

A recommendation in the Q Consult report into multiple use-classes was to offer more information to the local community. *“The idea of use-classes and multiple use-classes may be new to many businesses on the high street, including those that have operated for a longer period of time. An increase of awareness, as well as an explanation of the benefits of dual use-classes may encourage owners to reconsider. Therefore, raising awareness and giving more information through leaflets, mailing subscriptions, or local meetings should be continued.”*<sup>13</sup>

## **4.3 Site-specific policy - Onyx House**

### **4.3.1 Key issue**

Onyx House is currently used as temporary accommodation to house the homeless but it has potential to provide much needed business space within the neighbourhood plan area.

### **4.3.2 Policy**

#### **Policy LE2 relating to Onyx House, 401 Mile End Road E3 4PB**

Proposals to refurbish or redevelop Onyx House for commercial or business activities (Class E) are encouraged. Proposals for alternative uses should demonstrate that

- the building is genuinely unsuitable for continued employment use due to its condition;
- reasonable options for restoring the building to employment use are unviable;
- and that the benefits of alternative use would outweigh the benefits of employment use.

### **4.3.3 Conformity with other policies**

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<sup>13</sup> Queen Mary UL Q Consult report, Dec. 2019

#### 4.3.4 Justification

The site was the former location of the workshops of the Guild of Handicraft, then in the 1930s, an Odeon Cinema. The current 1985 building has had a number of names, starting out as Kentish House, then Besso House and then Onyx House, when it was home to the Onyx Environmental Group, a waste management company. In 2009 the building changed from business use (B1 office premises), to education use (D1). This change was not successful. The site was occupied by E-College, later known as Eden College, then Anglo College, the latter being compulsorily dissolved by Companies House in 2015. The building was occupied by property guardians from 2014 until 2019.

Planning permission was granted in 2019 for the building to be converted to provide 15 flats for temporary accommodation (C3) for homeless persons in priority need, under the 1996 Housing Act. This was despite the proposals not meeting the London residential space standards:

The assessment in the Delegated Planning Decision Report (Mar 2019) stated “proposals do not meet London residential space standards, however, as it is temporary accommodation, no objections are had.”

Paragraph 7.2 stated: *“Temporary - planning permission will be granted for a period of 5 years, as such, it will not be a permanent consent.”* The concluding summary (para 8.2) stated: *“Officers have considered the proposal against the policies identified and recognised a number of the policies have not been met. However the temporary nature of the use, the personal planning permission and the Council's statutory obligation to re-house homeless are material considerations that are considered to outweigh the shortfall in policy requirements.”*

### 4.4 Site specific action: Bow House Business Centre

#### 4.4.1 Key issue

#### 4.4.2 Action

##### **Action LE1 Bow House Business Centre, 153-159 Bow Road E3 2SE**

Planning applications will be encouraged that support Bow House Business Centre as a provider of affordable workspace for local businesses and other organisations.

#### 4.4.3 Conformity with other policies

#### 4.4.4 Justification

##### **Bow House Business Centre planning history**

The 1930s former Poplar Town Hall was granted Listed Building Status (grade II) in 2009. The site also falls within a Conservation Area. It has over 40,000 square feet of space over four floors.

## 4.5 Support for job seekers and local businesses

### 4.5.1 Key issue

### 4.5.2 Action

#### Action LE2 Sustained support for job seekers and local businesses

The Neighbourhood Forum supports the continued funding of programmes such as Workpath to help local residents get work-ready and find jobs, and the Enterprise team's Ready programme to help businesses start, grow and reach new markets. Targeted support is needed for charities, voluntary and community organisations and social enterprises.

The Forum supports the strengthening of links between local employers and secondary schools, such as:

- Mulberry UTC, which has established partnerships with larger employers,
- Bow School, which encourages enterprise learning,
- Central Foundation Girls' School, which actively support all students to plan for their futures after leaving school.

There are opportunities for work experience and employment to be developed, especially for students wanting to stay local and pursue more practical training and employment. Apprenticeship schemes need to be expanded, enabling small businesses to offer these. Training is largely government funded, with businesses contributing 5% of the overall training costs. New City College in Tower Hamlets and Hackney offer a wide range of apprenticeship training opportunities.

### 4.5.3 Conformity with local policy

#### Planning Obligations: SPD, Draft for consultation, Tower Hamlets Council, Mar 2020

Local Employment and Skills training: *"Local Plan Policy S.SG2 specifies that development is considered to contribute to the Local Plan vision and objectives where local training and employment opportunities in construction and/or end use are provided. All new developments must ensure that local residents are provided with the opportunity to access jobs resulting from the construction of the site or the end use."* (para 5.37, p24)

Tower Hamlets Work Path is a unique employment service for all Tower Hamlets residents, providing support for people at all levels of work, skill or experience.

## **4.6 Local cross-sector collaboration**

### **4.6.1 Key issue**

### **4.6.2 Action**

#### **Action LE3 Local cross-sector collaboration**

The Neighbourhood Forum supports a sustained cross-departmental approach by the Council, linking economic development, regeneration and environmental improvements, and partnerships in Bow across public, private and voluntary sectors. This is aimed at facilitating inclusive growth and economic and community development.

### **4.6.3 Justification**

## Objective 2: Green streets that encourage walking and cycling

*By 2031, we have a proper network of pedestrian and cycle connections and supporting infrastructure such as secure short-term cycle parking. The area is more accessible to get to and move around in. Liveable Neighbourhoods funding has delivered a network of attractive green routes that are safe to use. Instead of driving, people choose to walk and cycle, reducing local traffic volumes, associated air pollution and parking issues.*

### 5.1 Summary of current issues

### 5.2 Improving safe walking and cycling routes

#### 5.2.1 Key issue

#### 5.2.2 Policy

##### **Policy GS1: Improving safe walking and cycling routes**

Require development to enhance the pedestrian and cyclist experience by improving pavements, cycle routes, cycle storage, access through public spaces and wayfinding, particularly along routes away from busy main roads and key routes in support of School Streets..

This shall be achieved, where appropriate, by:

1. Contributions to the improvement of existing bicycle lanes and paths.
2. Contributions to the provision of safe and well designated cycle routes, including Grove Road, Tredegar Road, Old Ford Road, Parnell Road and Roman Road.
3. Contributions to the provision of new bicycle lanes and paths within the development site.
4. Contributions to the provision of new bicycle stands across Roman Road Bow.
5. The provision of appropriate bicycle storage in residential and commercial development.
6. Convenient, safe and well-signed footways designed to appropriate widths.
7. Other features associated with pedestrian access to the development, where needed, for example seating for pedestrians, signage.
8. Safe road crossings where needed.
9. Bus stops, shelters, passenger seating and waiting areas, signage and timetable information.

##### **Increasing accessibility**

Reduce street clutter and developments have to show consideration to accessibility and clear routes in public realm. With focus on key routes to and from Roman Road, including Grove Road and St Stephens Road

Maintain provision for Blue Badge parking provision

### 5.2.3 Conformity with other policies

This Neighbourhood Plan is in line with the Mayor of London's Transport Strategy and approach to Healthy Streets<sup>14</sup>. These aim to improve air quality, reduce congestion and help make London's diverse communities greener, healthier and more attractive places to live, work, play and do business. These have a central aim of *80 per cent of all trips in London to be made by walking, cycling and public transport and all Londoners to do at least 20 minutes of active travel each day by 2041*. The best way to get more people out walking and cycling is to improve the quality of the experience of being on our streets including for disabled residents and to discourage car use.

Additionally, Tower Hamlets has a vision to become the most cycle-friendly borough in London, with cycling becoming the natural choice of transport for most people<sup>15</sup>.

The Borough's 2031 plan aims to deliver an attractive, accessible and well-designed network of streets and spaces which promote social interaction and inclusion which people of all ages and abilities can value and enjoy and where they feel safe and comfortable.<sup>16</sup>

In July 2020 Tower Hamlets completed their consultation on the Liveable Streets Program. This will go some way to making it easier to walk and cycle around the neighbourhood, through improved walking routes, public space and reducing rat-running traffic. As well as reducing local pollution levels this will support the overarching London strategy of encouraging more trips to be taken on foot or by bike.

### 5.2.4 Justification

#### Air Pollution

As well as discouraging visitors and healthy activity, air pollution<sup>17</sup> has significant adverse effects on local residents from vehicles in the form of nitrogen dioxide, which is known to shorten lives and reduce the quality of life for tens of thousands of people, and in recent

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<sup>14</sup> London Government Healthy Streets strategy  
<https://www.london.gov.uk/what-we-do/health/transport-and-health/healthy-streets>  
Mayor's Transport Strategy  
<https://www.london.gov.uk/sites/default/files/mayors-transport-strategy-2018.pdf>

<sup>15</sup> Tower Hamlets - A Cycling Borough  
<https://www.towerhamlets.gov.uk/Documents/Transport-and-infrastructure/TH%20Cycling%20Strategy.pdf>

<sup>16</sup> Tower Hamlets Local Plan 2031: Managing Growth and Sharing Benefits  
[https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/TH\\_Local\\_Plan\\_2031\\_accessibility\\_checked.pdf](https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/TH_Local_Plan_2031_accessibility_checked.pdf)

<sup>17</sup>  
<https://www.theguardian.com/commentisfree/2018/aug/08/toxic-air-pollution-lethal-blight-politicians-failure-shame-heart-disease>

studies it has also been linked to health problems from dementia<sup>18</sup> to heart disease<sup>19</sup> and miscarriage<sup>20</sup>. Children are most at risk: exposure to air pollution when young can have lifelong effects as it can stunt the lungs and affect intelligence<sup>21</sup>.

Local monitoring as shown in [\[Annex map ref\]](#), highlights high levels of air pollution along Grove Road, Roman Road and Tredegar Road (as well as at the edges of the planning area on Mile End Road and near the A12). Spot monitoring (Station ID 45) has shown that the junction of Tredegar Road and St Stephen's Road has consistently been above the annual mean safe limit of 40ug/m<sup>3</sup> of Nitrogen Dioxide since 2016. Local children at Malmesbury, Olga and Chisenhale schools have produced a banner [\[link to annex\]](#) asking to lower pollution levels around the schools.

*Tower Hamlets Green Grid Strategy Update (2017)<sup>22</sup>, highlighted "There is a lack of connectivity to a number of community facilities, including schools, transport hubs and open spaces." 3 Schools in the area and all three tube/DLR stations that serve the area are not connected.*

### **Busy and Dangerous Roads**

Currently, people are discouraged from walking and cycling in the Plan Area because most routes are along busy main roads that are dangerous and with high levels of air pollution. 66% of local residents want less traffic and 51% want better footways. It is likely that more people would walk and cycle if there were attractive routes through green areas away from main routes. This could also bring more people into the area to visit local businesses. According to Liveable Streets approximately 49% of traffic in the neighbourhood between 6am and 8pm on weekdays is rat-running - the equivalent of over 13,000 non-resident vehicle journeys a day.<sup>23</sup>

TfL data [\[Annex map ref\]](#) shows that in the last three years there have been over 100 collisions involving pedestrians or cyclists (nearly all caused by cars). This has included multiple fatalities. As well as the A11, accident black spots include Grove Road, Roman Road and Tredegar Road (which are also used for rat running).

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<https://www.theguardian.com/environment/2018/sep/18/air-pollution-causes-jump-in-dementia-risk-study-suggests>

19

<https://www.theguardian.com/environment/2018/aug/03/air-pollution-linked-to-changes-in-heart-structure>

20

<https://www.theguardian.com/environment/2019/jan/11/air-pollution-as-bad-as-smoking-increasing-risk-of-miscarriage>

21

<https://www.theguardian.com/environment/2018/aug/27/air-pollution-causes-huge-reduction-in-intelligence-study-reveals>

22

[https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/Green\\_Grid\\_Update\\_2017.pdf](https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/Green_Grid_Update_2017.pdf).

<sup>23</sup> Liveable Streets Engagement Report

The Sustrans Bikelif<sup>19</sup> Study found 48% of residents don't cycle (or cycle less) because they are concerned about safety.

### **Accessibility**

London's streets need to be welcoming to ensure that our communities prosper. According to the Mayor's Transport Strategy, currently 65 per cent of disabled Londoners consider the condition of pavements to be a barrier to walking, and 43 per cent report that obstacles on pavements, such as unnecessary signage, advertising boards and other clutter, are a barrier to walking more. Gargi Roy's MSc Dissertation ([annex link](#)) found that many footways were overly narrow and there was often unnecessary street furniture and build up of litter.

Mile End is a strategic central location in the borough, and is served by the Central, District, and Hammersmith and City tube lines. The lack of step-free access is a major barrier for the less mobile. Transport for London's<sup>24</sup> plans up to 2024 do not include a step-free Mile End.

The issue has been raised by a student who is a wheelchair user from nearby Queen Mary College, who gained 1,500 signatures for a petition<sup>25</sup> in support of step-free access.

A local campaign<sup>26</sup> for lift access was launched in 2019. Stuart Wilson, marketing and communications coordinator for Ability Bow, a local inclusive community gym, said: "*Acceptable access for vulnerable people is obviously really important.*" A lift in the busy interchange station "*could really help somebody with severe complexities, disabilities or long-term health conditions.*" He warned that without the lift, climbing Mile End tube station's 45 steps would leave someone with a heart condition seriously out of breath, and would be dangerous for someone with limited sight or hearing.

### **Difficulty of walking and cycle around the area**

The Sustrans study also found security is an issue with 1,536 reported cycle thefts in 2018/19, which is 1 theft per 47 owners. There is also only one cycle parking space per 9 resident cycle owners. This is particularly an issue in the neighbourhood with large numbers of people living in flats.

76% of people overall think space should be increased for people socialising, cycling and walking on their local high street and 47% think more cycling would make their area a better place to live and work.

Concern for personal safety is highlighted by a local petition over mopeds and motorised scooters at Tom Thumb's Arch<sup>27</sup>.

The Neighborhood's forum Green Spaces and Connectivity study connected by UCL ([annex link](#)) found for pedestrians key routes relate to the transport hubs of Mile End and Bow Road into

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<sup>24</sup>

<https://tfl.gov.uk/travel-information/improvements-and-projects/step-free-access?intcmp=1954>

<sup>25</sup> <https://www.change.org/p/transport-for-london-step-free-access-in-mile-end-station>

<sup>26</sup> <https://romanroadlondon.com/campaign-step-free-access-mile-end-tube/>

<sup>27</sup>

[https://www.thepetitionsite.com/en-gb/638/365/719/stop-mopeds-riding-through-tom-thumbs-arch-in-bow-east-london./](https://www.thepetitionsite.com/en-gb/638/365/719/stop-mopeds-riding-through-tom-thumbs-arch-in-bow-east-london/)

the Plan Area and through to the high street and Victoria Park, particularly through bottlenecks under the railway.

For cyclists there are key routes off CS2 (particularly along Grove Road) and east-west along Roman and Tredegar Roads. These also correlate to dangerous routes. Off the roads, Mile End Park and the Canal were identified as important cycle routes.

### 5.3 Actions to improve walking and cycling provision

#### Actions GS1

1. **Improving safe walking and cycling routes.** Action to be taken to improve public routes to Roman Road and Victoria Park, in line with the UCL study, [annex link] for example, on Wennington Green and through Tom Thumb's Arch. Quiet cycle routes should be provided connecting to the strategic London network and a segregated route along Grove road should be introduced.
2. **Making streets safer for children.** Introduce School Streets for all schools in the area, restricting motorised vehicle access at drop-off and pick-up times and ensure wide accessible footways outside of new developments.
3. **Blue Badge parking.** Maintain provision for Blue Badge parking provision in Roman Road, as well as road access for Taxis.
4. **Step-free access at Mile End.** The Council and Transport for London to work together to ensure step-free access at Mile End underground is included in TFL's step-free programme .

## Objective 3: Beautiful public spaces

*By 2031, investment has transformed the public realm by creating green and de-cluttered local streets. Popular play areas designed to encourage free play and a love of nature now replace former neglected spaces. The former car park on the corner of Roman Road and St Stephens Road plays a valuable role as a community space. The improved public realm has helped to reduce anti-social behaviour. Residents and businesses are proud of their high quality, litter-free environment - fly-tipping is no longer tolerated following vigorous campaigning and local action by the community.*

### 6.1 Summary of current Issues

### 6.2 [Enhancing public realm spaces](#)

#### 6.2.1 Key Issue

#### 6.2.2 Policy

##### **Policy PS1 to enhance public realm spaces**

Proposals to enhance existing public spaces will be supported where they address the following specific needs :

Improved provision for recreation and play on housing estates at:

- Lawrence Close E3 2AS
- Heylyn Square E32DW
- Rectangular paved area with hedges at foot of Wilmer House, Daling Way E3 5NW
- Tarmac square outside Forth House E3 2HQ
- Sutherland Road football court (to become a multi-use court) and adjacent children's play space to be re-designed.E35HG

All proposals will be expected to accompany such provision with high quality landscaping.

Public realm improvements through parklets or similar environmental measures at:

- Pavement at entrance to Lanfranc Estate on Roman Road, E3 5QP
- Ford Close off Roan Road E3 5LX
- Ford Road off Roman Road E3 5JN (outside Common Room)
- Basilica Place in Roman Road market E3 5EL
- Pavement outside Territorial Army base at Mile End E3 4PD
- Corner of Bow Road and Alfred Street E3 2AD

( Photos of sites in Evidence Base)

### 6.2.3 Conformity with other policies

**Tower Hamlets Green Grid Strategy: Update 2017**<sup>28</sup> page 20, Roman Road: 'There is some unused space on the wider pavements, which could be used to create additional seating and associated landscaping including planters, street trees and pocket parks, as well as better signposting the rest of the Borough and city from here, so it does not feel so isolated. The area has a rich history particularly as the Suffragette heartland, which could be better celebrated through public realm interventions including art and community events.'

#### **Roman Road Market Conservation Area, Tower Hamlets Council, 2009**<sup>29</sup>

*"Despite recent improvements, there is still potential for the general quality of the landscaping in the street to be improved, and the area could benefit from a public realm strategy to coordinate physical features with management procedures. The fragile character of Roman Road has been eroded in the past by unsympathetic alterations and re-building, and further attrition of this character must be prevented."* (p11)

### 6.2.4 Justification

#### **Roman Road Bow Neighbourhood Forum, community engagement, April 2018**

In the consultation, one person identified 'parklets'<sup>30</sup> as a good idea for improving public spaces.

*"New developments along the canal do not have much green space - new developments that come forward should have a certain specified minimum amount of green space, especially if they create new walking routes through."*

#### **UCL students Green Spaces and Connectivity study**

The neighbourhood plan project by Spatial Planning students at University College London<sup>31</sup> summarised the Forum's community engagement findings as: *"A desire to protect and enhance the built environment, improve green spaces and under-used public spaces and strengthen community-led initiatives... are part of this consensus. These are themes that we can build upon as we develop policies and projects for our neighbourhood plan."*

'A review conducted by 'Tower Hamlets Housing Scrutiny Sub Committee' and 'Tower Hamlets Homes Residents Panel' demonstrated that the open spaces in areas of social housing across Tower Hamlets are currently underused. Within RRB, both Malmesbury estate and the areas of

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<sup>28</sup>

[https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/Green\\_Grid\\_Update\\_Appendices\\_2017.pdf](https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/Green_Grid_Update_Appendices_2017.pdf)

<sup>29</sup>

<https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Development-control/Conservation-areas/Roman-Road-MarketV1.pdf>, page 11

<sup>30</sup> <https://www.meristemdesign.co.uk/shoreditch-parklet>

<sup>31</sup> Green Spaces and Connectivity: Roman Road Bow Neighbourhood Plan, page 25.

social housing to the east of St Stephen's Road currently have small green spaces that are underused. Furthermore, the aforementioned consultations held by the forum highlighted the need for additional play spaces across both these areas. Therefore, there is a need to encourage social landlords to better utilise these green spaces through small scale interventions.'

'Smaller play areas for younger children offer another method to revitalise the existing green spaces. Additionally, the football court on Sutherland Road is limited and currently requires improvements. This should be replaced with a multi-use court to facilitate a variety of sports for both children and adults. These initiatives will provide additional play space for children of different age groups; encouraging social interaction and achieving health and wellbeing benefits.'<sup>32</sup>

## 6.3 Designating Local Green Spaces

### 6.3.1 Key Issue

### 6.3.2 Policy

#### **Policy PS2 to designate Local Green Spaces**

#### **The following are designated as Local Green Spaces:**

- Daling Way, E3 5NB;
- Holy Trinity Churchyard, Morgan St. E3 5AT.
- Lockton Green, Ruston St. E3 2LP
- Matilda Gardens E3 2GS,
- Trellis Square E3 2DR 39
- Brodick House E3 5HH
- Roman Road Adventure Playground, 48 Hewlett Road, Bow, London, E3 5NA.
- Wennington Green, Junction of Roman Rd and Grove Rd E3 5TG
- Wick Lane E3 2PU.

Managing development on a Local Green Space should be consistent with national planning policy for Green Belts. Proposals for built development on Local Green Spaces will not be permitted unless it can be clearly demonstrated that it is required to enhance the role and function of that Local Green Space or that very special circumstances exist, for example where it is essential to meet specific necessary utility infrastructure and no feasible alternative site is available.

(Photos of sites in evidence Base)

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<sup>32</sup> UCL Green Spaces and Connectivity, paragraph 6.2.1

### 6.3.3 Conformity with other policies

#### **National Planning Policy Framework 2019<sup>33</sup>**

*"The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period."* (para 99, p.31)

*"The Local Green Space designation should only be used where the green space is:*

- a) in reasonably close proximity to the community it serves;*
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- c) local in character and is not an extensive tract of land."* (para 100, p.31)

#### **Local Plan 2031, Policy D.DH2 Attractive streets, spaces and public realm**

*"Development is required to contribute to improving and enhancing connectivity, permeability and legibility across the borough, ensuring a well-connected, joined-up and easily accessible street network and wider network of public spaces through:*

- a. improving connectivity to public transport hubs, town centres, open spaces, water spaces, social and community facilities and surrounding areas*
- b. maintaining existing public routes or appropriately re-providing access routes during the construction phases of new development, and*
- c. incorporating the principles of 'secured by design' to improve safety and perception of safety for pedestrians and other users."* (para 1, p.46)

#### **Tower Hamlets' Parks and Open Spaces Strategy 2017-27<sup>34</sup>**

Bow West is forecast to have a 'moderate' deficiency of open space in 2031. The strategy states that: *"It is expected that new publicly accessible open space will be owned and maintained by the respective land owners, with public access to the space secured through legal agreements as part of the planning process. Such an approach will secure new publicly accessible open space whilst recognising the council's financial position in years to come. Legal agreements will be required to secure the widest possible access to these new spaces."* (p82)

#### **CL students Green Spaces and Connectivity study**

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<sup>33</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/810197/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf), page 29.

<sup>34</sup>

[https://www.towerhamlets.gov.uk/Documents/Leisure-and-culture/Parks-and-open-spaces/Open\\_Space\\_Strategy\\_2017.pdf](https://www.towerhamlets.gov.uk/Documents/Leisure-and-culture/Parks-and-open-spaces/Open_Space_Strategy_2017.pdf), page 82.

The study identified the following objectives to protect, enhance and create green spaces through site-specific interventions:

- To improve the health and well-being of residents and the environment.
- To revitalise green spaces which are currently underused.
- To increase the number of green spaces in the neighbourhood by adding green infrastructure where desirable and feasible.
- To protect the existing green spaces from damage or loss through development and to grasp development opportunities and funding to enhance the quality of green spaces.

The study highlighted the opportunity for revitalising Wennington Green, stating: *“The site lacks permeability and maintenance but has potential to attract visitors due to its location on the high street and its proximity to Victoria park.”*

A planting intervention is proposed as a means to improve this open space.

#### 6.3.4 Justification

##### **Daling Way**

**Near:** The green space on the Ranwell West Estate off Daling Way surrounds 3 tower blocks, Ingram House, Wilmer House and Sandall House and lower rise maisonettes.

**Special:** The space is precious as a small area of nature amid high-rise housing and terraced streets. It is landscaped open space, including fruit trees and grassed areas.

**Local:** It is well defined by the boundary railings of the estate, and the side of the Lord Morpeth pub with its attractive suffragette mural.

##### **Holy Trinity Churchyard**

**Near:** The churchyard is in the Tredegar Square conservation area, and surrounds the grade II church building. It is adjacent to Tutelage Court, grade II listed former Coopers' Company and Coborn School.

**Special:** It's a well-preserved churchyard, which closed for burial in 1853, was refurbished in 1886/7 as Holy Trinity Garden by the Metropolitan Public Gardens Association. It has significant historic value, as well as being a haven for wildlife and a valued community asset. The Mile End Church of God, which uses the church buildings, stated there is 'much interest locally for the opening and upkeep of the gardens with strong interest from the local community to create community orientated pocket parks.'

**Local:** It has well defined boundaries, including iron railings onto Morgan Street and a brick wall onto Lichfield Road.

##### **Lockton Green**

**Near:** The area is open space on the Lockton Green Estate, with its tower blocks and surrounding streets of flats and maisonettes designed as a coherent whole.

**Special:** Lockton Green includes a community space constructed as part of the parkside regeneration scheme. 'In-Ex Landscapes' constructed an imaginative, safe and playful environment for local residents and children. The scheme consists of safety play surfaces, gym equipment, dinosaur skeleton / footprints and eggs, resin bound interlinking paths, drystone limestone walls and large areas of hard landscaping.

**Local:** The estate has recently seen substantial regeneration, including landscaping and new paths, and Parnell Road provides a clear perimeter boundary to the space.

### **Matilda Gardens**

**Near:** The rectangular gardens are set in the recently developed Bow Quarter, and are surrounded by modern 4-5 storey blocks of flats in an area of dense housing, with little green space.

**Special:** it is a well designed space with grass, trees, a sculpture and a children's play area. A valuable community asset, adding significantly to the quality of the environment.

**Local:** The gardens are a landmark feature surrounded by housing, and are well defined by boundary railings.

### **Trellis Square**

**Near:** This oasis of green is set in the middle of housing on the Malmesbury Estate.

**Special:** The community food garden of 39 plots was set up in 2011. It is one of the few allotment spaces in the borough, and a valuable community asset providing important opportunities for local residents to grow their own food.

**Local:** it provides a focal point for residents on the estate, and the Malmesbury Residents Association have expressed interest in taking over its management from Tower Hamlets Homes.

### **Brodick House**

**Near:** This small green space is set at the foot of Brodick House, a 1960's, 22 storey tower block with 130 flats, surrounded by flats and maisonettes on three sides and St Stephen's Health Centre on the fourth side.

**Special:** it is valuable amenity green space for local residents. It consists of two small, distinct spaces - a general area with grass, small raised beds and a few small trees, and a separate dog walking area.

**Local:** it is an important amenity for nearby residents in an otherwise very dense and busy setting. The area is well defined by external railings.

### **Roman Road Adventure Playground**

**Near:** Three tower blocks overlook the playground, which is set on the edge of a housing estate and terraced housing in Hewlett Road, Bow

**Special:** Supported by Clarion housing, It was the first adventure playground to be built by a housing association in England as a free, safe space for local children to play. It continues to provide a crucial safe outdoor play space for local children.

**Local:** The playground has perimeter fences to ensure that local children enjoying the space are kept safe.

### **Wennington Green**

**Near:** This is a grass area beside the Regent's Canal, linking Victoria and Mile End parks. it is much used by local residents and visitors to the area.

**Special:** Amenity green space used for recreation and community events by nearby churches and other local groups. It has exercise equipment on the north side.

**Local:** it is bordered by the canal, Bow Wharf, Grove Road and Roman Road. its railings were the site of a large installation of placards supporting the NHS during the early stages of the pandemic.

### **Wick Lane**

**Near:** A precious corridor of small trees, bushes and grass sandwiched between housing on Wick Lane and the A12 , south of the junction with Tredegar Road.

**Special:** Wick Lane is an old road which connected Bow Road and Hackney Wick, but was closed at the Bow Road end due to the development of the A12. The verge acts as a barrier to noise and air pollution for residents on Wick Lane's 4-6 storey flats.

**Local:** This is the last remnant of the natural environment along Wick Lane, and a valuable nature corridor which benefits local residents and provides a screen from the busy A12. It is bordered by a low concrete wall along Wick Lane, and the space ends at an electricity sub-station near the former Bryant and May match factory.

## **Objective 4: New life for our heritage and community facilities**

*By 2031, an updated Bow Heritage Trail links historic buildings, parks, galleries, pubs and restaurants, street market and shops along pedestrian friendly routes. Undervalued heritage assets such as the Three Colts and Parnell Road bridges over the Hertford Canal are better conserved. Our precious heritage resource is protected and enhanced to ensure that it continues to be appreciated and enjoyed by future generations. The existing network of community groups running facilities - be it health centres, children and youth provision, arts and performance programmes and places of worship - form a community consortium where opportunities for provision of new facilities or future expansion of existing facilities can be agreed across the Neighbourhood Plan Area. The consortium's remit will provide a clear structure and programme for distributing funding and building a resilient infrastructure of community facilities that meets the needs of the local population into the future.*

### **7.1 Summary of current Issues**

Heritage and community facilities come together here under the common theme of breathing new life into the Neighbourhood Area. Much of the heritage and community facilities in the Area are under-valued and in need of improvement and better care. Equally, the recent history of housing development has been one of designs that serve to isolate places from the community in which they are situated, rather than make them feel part of it. Bow aspires to expect more from its buildings and facilities.

### **7.2 Policy for public houses to become locally designated heritage assets**

#### **7.2.1 Key Issue**

## 7.2.2 Policy

### **Policy H1: Public houses to become locally designated heritage assets**

The following are identified as locally-designated heritage assets:

- a. The Albert, 74 St. Stephen's Road E3 5JL
- b. The Coborn Arms, 8 Coborn Road E3 2DA
- c. The Crown, 223 Grove Road E3 5SN
- d. Green Goose, 112 Anglo Road, Bow London E3 5HD
- e. Little Driver 125 Bow Rd E3 2AN
- f. Lord Tredegar 50 Lichfield Road E3 5AL
- g. Morgan Arms 43 Morgan Street E3 5AA
- h. Young Prince 448 Roman Rd, London E3 5LU

Proposals for the alternative use of these heritage public houses will be supported if they meet the requirements of Local Plan Policy D.CF4 (Public houses), are compatible with the setting of the asset and do not cause harm to its physical structure.

In considering proposals which involve the loss or alteration of any of these heritage assets, consideration will be given to:

- i. Whether the asset is structurally unsound and beyond feasible and viable repair (for reasons other than deliberate damage or neglect); or
- ii. The extent to which measures to sustain the existing use, or find an alternative use/user, have been investigated.

(Photos in Evidence Base)

## 7.2.3 Conformity with other policies

### **Tower Hamlets Local List, New Additions, 2019<sup>35</sup>**

In 2019 Tower Hamlets made new additions of local pubs to its local list of buildings and structures that, whilst not statutorily listed for their national importance, are considered to be of local importance. These included the Eleanor Arms and the adjacent building No. 458, as together they form a single development (in the setting of Victoria Park Conservation Area) , Lord Morpeth (in the setting of Victoria Park conservation Area) and The Victoria.

Existing pubs in the plan area also include the nationally listed Palm Tree , 127 Grove Road E3 5BH (Grade II listed building),

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<https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Development-control/Conservation-areas/New-additions-to-the-local-list.pdf>

Pubs and restaurants have suffered greatly during the pandemic and are struggling to survive. They represent not only some fine local buildings, but are community meeting places for people who value socialising over a drink and food.

**The Albert**, 74 St. Stephen's Road E3 5JL is in the Roman Road Market conservation area. It has been a pub since at least 1869, and occupies a site on St. Stephen's Road at the entrance to the historic Roman Road Market. The distinctive brick building has a rounded corner and a steep roof with protruding windows. It has very much retained its character as a 'proper East End pub' catering for the local community.<sup>36</sup> It's owned by Ei group.

**The Coborn Arms**, 8 Coborn Road E3 2DA lies in the Tredegar Square conservation area. A pub was at No.4 since at least 1833, and the Coborn has been at the present site of No. 8 since at least 1956. The brown bricks of the upper storeys are rotated to feature vertical stripes above the three upper windows. It has a traditional pub sign and Victorian railings. Today it's owned by Youngs and the pub and restaurant are popular with both locals and visitors.<sup>37</sup>

**The Crown**, 223 Grove Road E3 5SN is The Crown is beside the busy roundabout southwest of Victoria Park. It has existed since at least 1860. The dominating building occupies a corner apex, with two Georgian terraces conjoined with the protruding rounded single storey entrance to the bar. and the pub and restaurant are very popular with many who visit the Victoria Park area. it's owned by Youngs.

**Green Goose**, 112 Anglo Road, Bow London E3 5HD is in the Roman Road Market conservation area.. Named after the annual local Green Goose Fair from 17th - 19th century, it's a Victorian building on the corner of Anglo Road and Cardigan Road, just off the Roman Road market. The brown brick building has a series of arched windows, with large white borders, and retains the original character of the surrounding streets, which have seen much redevelopment. It primarily serves the local area, and has a much appreciated garden. Part of the Mosaic Pub and Dining group.

**Little Driver** 125 Bow Rd E3 2AN is on the busy A11 Bow Road. The three storey building is of brown brick, with large cream bordered windows. The pub was present by 1811 and probably rebuilt in its present form in 1869. Its name derives from its proximity to the nearby British Railway Bow Station, which opened in 1849 and closed in 1964. It's a popular traditional East End pub owned by Bass Charrington.<sup>38</sup>

**Lord Tredegar** 50 Lichfield Road E3 5AL is a Grade II listed building in the Tredegar Square conservation area set among Victorian terraced houses. A floor to ceiling map of the world lines the wall of the 'map room'. The Victorian brick building has cast iron railings separating the pub from the pavement, and the green tree-lined road compliments the gold and burgundy detailing of the signage. Part of the Remarkable Pubs chain.

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<sup>36</sup> <https://romanroadlondon.com/albert-pub-refurbishment/>

<sup>37</sup> <https://pubwiki.co.uk/LondonPubs/Bow/CobornArms.shtml>

<sup>38</sup> <https://pubwiki.co.uk/LondonPubs/Bow/LittleDriver.shtml>

**Morgan Arms** 43 Morgan Street E3 5AA. Set in the Tredegar Road conservation, near the leafy square itself. The red brick of the 1892 townhouse features an angled corner, with double doors and two different plaques bearing the pubs name and offer. Large bordered windows occupy the upper two storeys, whilst the glazed street-level has been painted grey. Mock corinthian columns separate the windows and doors, whilst the frieze bearing the signage features ionic details. Inside, it has a beautifully preserved wooden bar. This is a popular gastro pub with locals, and has outside picnic tables which link it to the area. Run by Metropolitan Pub Company

**Young Prince** 448 Roman Rd, London E3 5LU. occupies two narrow red-brick terrace buildings on the Roman Road. Inside, it's dimly lit and cosy with an abundance of old photographs, trophies and framed fish. A traditional local , with darts nights and televised football. it benefits from a beer garden at the rear, away from the noisy traffic

### **The National Planning Policy Framework**

Local planning authorities should *“plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, **public houses** and places of worship) and other local services to enhance the sustainability of communities and residential environments”* (para 92, p.27)

### **Debate in Houses Parliament, 12 February 2015**

CAMRA have lobbied the government for pubs to be removed from the A4 use class and placed into the 'Sui Generis' category. This would require a planning application with opportunity for public representations before any change of use. A debate on this issue was held in Parliament on 12th February 2015. A concession required pubs designated as Assets of Community Value (ACV) to be subject to full applications for any change of use.

### **General Permitted Development Order 2015 (Consolidated)**

Applicants are required to submit written notice to local planning authorities giving notice (fifty-six days) before implementing change of use under permitted development. This allows time for ACV nominations to be received.

### **London Plan, intend to publish version,<sup>39</sup> Policy HC7 Protecting public houses**

*“Boroughs should:*

- 1. protect public houses where they have a heritage, economic, social or cultural value to local communities, and where they contribute to wider policy objectives for town centres, night-time economy areas and Creative Enterprise Zones.*
- 2. support proposals for new public houses to stimulate town centre regeneration, cultural quarters, the night-time economy and mixed-use development, where appropriate.*

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<sup>39</sup> [https://www.london.gov.uk/sites/default/files/intend\\_to\\_publish\\_-\\_clean.pdf](https://www.london.gov.uk/sites/default/files/intend_to_publish_-_clean.pdf) page 349.

*Applications that propose the loss of public houses with heritage, cultural, economic or social value should be refused unless there is authoritative marketing evidence that demonstrates that there is no realistic prospect of the building being used as a pub in the foreseeable future.*

*Development proposals for redevelopment of associated accommodation, facilities or development within the curtilage of the public house that would compromise the operation or viability of the public house use should be resisted.” (para A, p.349)*

#### **Tower Hamlets Council, Assets of Community Value<sup>40</sup>**

This document gives detailed guidance to local groups wishing to nominate an asset of community value.

#### **Pubs in Tower Hamlets, An Evidence Based Study, 2016<sup>41</sup>**

In cases where the loss of a public house is proposed, the applicant must robustly demonstrate genuine unviability. Evidence requirements of unviability is to include:

- a) Showing that different methods of business practice have been attempted;
- b) Showing that the pub has been offered free-of-tie and restrictive covenant;
- c) Showing that there has been genuine attempts to let or sell the pub for A4 use at local market rates;
- d) Showing that a minimum period of 12 months for attempting to let or sell the property as a pub has been completed;
- e) Showing that the pub has been actively marketed through appropriate and relevant publications and websites by requesting independently verified marketing evidence.” (Recommendations, pages 29-30)

#### **The National Planning Policy Framework 2019<sup>42</sup>**

*“Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:*

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<sup>40</sup>

<https://www.towerhamlets.gov.uk/Documents/Council-property/Property-and-land-management/Leasing/LONDON-BOROUGH-OF-TOWER-HAMLETS-ACV-Guidance-Notes-to-complete-Nomination.pdf>

<sup>41</sup>

[https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/Pubs\\_in\\_Tower\\_Hamlets\\_Evidence\\_Study\\_2016.pdf](https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/Pubs_in_Tower_Hamlets_Evidence_Study_2016.pdf)

<sup>42</sup> <https://www.gov.uk/government/collections/revised-national-planning-policy-framework>

- a) *the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;*
- b) *the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
- c) *the desirability of new development making a positive contribution to local character and distinctiveness; and*
- d) *opportunities to draw on the contribution made by the historic environment to the character of a place.” (para 185, p.54)*

## 7.3 Opportunities for new types of Public House

### 7.3.1 Key Issue

### 7.3.2 Action

#### **Action H1 Opportunities for new types of Public House**

Tower Hamlets Council to facilitate new models of pubs coming forward, and broaden the locations in which proposals might be acceptable. For example, the growing movement of 'micro-pubs' is conducive to being delivered outside of main town centres without harming surrounding residential amenity.

### 7.3.3 Justification

## 7.4 Bow Heritage Trail

### 7.4.1 Key Issue

### 7.4.2 Action

#### **Action H2 Wayfinding and heritage trail**

Implementing the 2017 Green Grid Strategy to include better wayfinding and integration with TFL's Legible London signage. It will link the Roman Road shops and market with community facilities, cultural and historic places of interest, and surrounding Olympic, Mile End and Victoria parks through an updated and downloadable Bow heritage trail.

### 7.4.3 Conformity with other policies

#### Historic England, Neighbourhood Planning and the Historic Environment, Advice Note 11<sup>43</sup>

*"It is for the local community to decide on the scope and content of a neighbourhood plan. They may wish to set out a specific historic environment section within the plan, drawing on the evidence gathered. There are benefits from consolidating related information in a clear, focused way."*(p18)

#### Conservation Areas in Bow



#### Tower Hamlets Conservation Area character appraisal and management guidelines

The following Conservation Areas lie within the neighbourhood plan area: Fairfield Road, Tredegar Square, Roman Road Market, Medway, Driffield, Clinton Road, Victoria Park (southern end of Cadogan Terrace).<sup>44</sup>

<sup>43</sup>

<https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/neighbourhood-planning-and-the-historic-environment-historic-england-advice-note-11/>, pages 17-18.

<sup>44</sup>

[https://www.towerhamlets.gov.uk/ignl/planning\\_and\\_building\\_control/conservation\\_and\\_urban\\_design/conservation\\_areas.aspx](https://www.towerhamlets.gov.uk/ignl/planning_and_building_control/conservation_and_urban_design/conservation_areas.aspx)

### **Tower Hamlets Conservation Strategy 2016-26<sup>45</sup>**

*"In overview, given the Borough's current social and economic issues, regeneration and housing development is a key strategic priority in the Borough. However, development will potentially drive increased pressure on the heritage resource, impacting heritage character, context and significance, and heritage that is locally important. Although there is good protection already in place for much of the Borough's heritage, there are still some important gaps. There is often limited clarity on the specific characteristics that contribute to significance, and therefore on the developments that are most appropriate."* (para 3.2.2, p.11)

*"There are a number of key heritage structures or types of heritage that are not well represented currently in designations – including for example industrial heritage, which remains less understood and appreciated despite its seminal role in the Borough's history and identity. There are also limitations around the protection for locally important heritage. In addition, evolving community needs are causing some buildings to cease to be fit for purpose, thereby putting their future viability at risk, and there are also issues associated with the condition of the heritage in the Borough – around general upkeep and damage, and around inappropriate works that undermine character and significance."* (para 3.2.3, p.11)



**Parnell Road Bridge, Old Ford. Left in disrepair during most of 2020**

### **7.4.4 Justification**

**Tower Hamlets Green Grid Strategy: Update 2017<sup>46</sup>**, page 2, Roman Road: 'There is some unused space on the wider pavements, which could be used to create additional seating and associated landscaping including planters, street trees and pocket parks, **as well as better signposting the rest of the Borough and city from here, so it does not feel so isolated.** The

<sup>45</sup>

[https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/Evidence\\_base\\_2016\\_Local\\_Plan/Conservation\\_Strategy\\_Consultation\\_Draft.pdf](https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/Evidence_base_2016_Local_Plan/Conservation_Strategy_Consultation_Draft.pdf), pages 11-12.

<sup>46</sup>

[https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/Green\\_Grid\\_Update\\_Appendices\\_2017.pdf](https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/Green_Grid_Update_Appendices_2017.pdf)

area has a rich history particularly as the Suffragette heartland, which could be better celebrated through public realm interventions including art and community events.'

**TFL Legible London**<sup>47</sup> 'We work with the London Development Agency, and in partnership with London boroughs, to develop a way of providing coordinated walking information across the Capital, offering benefits for our transport system, for public health, the economy, tourism and the environment.'

**Bow Heritage Trail**<sup>48</sup> The signposted trail thorough Bow with plaques giving information about places of historic interest is now defunct. The Tower Hamlets Local History Library and Archives at 277 Bancroft Road, London E1 4DQ with its close proximity to Queen Mary College,<sup>49</sup> provides an exciting opportunity for updating the trail using digital technology.

## 7.5 Policy for Bow Wharf waterway infrastructure conservation and enhancement

### 7.5.1 Key Issue

### 7.5.2 Policy

#### **Policy H2 Bow Wharf waterway infrastructure conservation and enhancement**

Development proposals at Bow Wharf must demonstrate how they preserve and enhance the heritage of the area and the canal. Preferably this should be informed by a comprehensive heritage plan developed in conjunction with the Canal and River Trust, local businesses, residents and community groups.

Development proposals must provide for an appropriate mix of uses that includes leisure and recreational activities and affordable workspaces for small businesses. Recreation provision that improves connectivity with the Green Grid to better link Victoria and Mile End parks and/or Hackney Village with the Roman Road, will be strongly supported.

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<sup>47</sup> <https://madeby.tfl.gov.uk/2019/07/10/legible-london/>

<sup>48</sup>

<sup>49</sup>

<https://www.qmul.ac.uk/media/news/2019/hss/queen-mary-pledges-commitment-to-the-local-community.html>



### 7.5.3 Justification

#### **Tower Hamlets Water Space Study, 2017<sup>50</sup>**

Engaging Stakeholders: *“Due to the varied land ownership and because many opportunities relate to site allocations for future development, the Council will need to work in partnership with a wide range of organisations and developers to effectively deliver the water space opportunities”* (para 4.13, p.64)

#### **Bow Wharf, Friends of Regents Canal, 2013<sup>51</sup>**

*“In addition to the junction’s intrinsic geographical and historical significance, it retains within a small area several historic structures of types now rare on London’s canals (cast-iron-girder bridge, stop lock, stoneway, remains of wharf cottages, chimney from sawmill, canal carrier’s warehouse.) Their setting retains a relatively low density of built development that was characteristic of the canals of this area until recent years. It also has a fair number of trees, which combine with the small scale of the buildings to produce a calm and pleasant environment and which also form a link both visual and ecological between the public parks to the north and south. The canals of inner London are rapidly becoming dominated by modern waterside developments of a new scale, mostly residential, but of high activity where commercial, so that Bow Wharf provides a now scarce enclave of calm and historic character that it is necessary to protect and sustain.”*

Note: the wharf cottages were demolished and were replaced as part of a development, completed in 2018, with three taller blocks of 34 residential units and a small commercial space.

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[https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/Water\\_Space\\_Study\\_2017.pdf](https://www.towerhamlets.gov.uk/Documents/Planning-and-building-control/Strategic-Planning/Local-Plan/Water_Space_Study_2017.pdf)

<sup>51</sup><http://friendsofregentscanal.org/features/property-devt/Bow-Wharf/BOW-WHARF-Character-of-the-CA-GLIAS-2013.pdf>

## Objective 5: High Quality Housing Provision

*By 2031, new developments over the last decade integrate well with existing communities, retaining the character of local neighbourhoods without destroying locally listed assets. A majority of the homes are low carbon homes. Roman Road Community Land Trust has pioneered a few affordable and well designed community-led housing schemes around Bow. Incremental, small scale housing projects over time have created a greater variety of housing types. These housing schemes reflect the local housing need and promote community cohesion very successfully.*

### 8.1 Summary of current issues

The Roman Road Bow area is an area with a well-established urban grain, characterised mainly by Victorian and Georgian terrace housing, low rise apartment blocks, punctuated by a few high rise blocks which are mostly council housing.

The area covered by the Neighbourhood Plan is almost contiguous to the Bow area under Sub-Area 2: Central in the Local Plan (p220). Bow is identified as an area of Very Low Growth (0-1000 units contribution to Tower Hamlets' housing targets for 2031). The wider Central area is required to contribute 7597 units of housing to Tower Hamlets' housing targets for 2031. Within the Central Area there are only two allocated sites: Bow Common Lane and Chrisp Street Town Centre. These fall outside the Neighbourhood Plan Area.

Nonetheless, there are some housing development opportunities within the designated area which we would like to address in this Neighbourhood Plan through these key housing objectives:

- To identify and allocate appropriate small sites for residential developments and encourage intensification of underdeveloped and brownfield sites. (RRB.H1)
- To encourage creative design in small scale housing developments to promote a greater variety of housing types and community cohesion. (RRB.H2)
- To promote and prioritise Community-Led Housing, specifically the Roman Road Community Land Trust, as a preferred delivery mechanism for affordable housing. (RRB.H3)

### 8.2 Housing Needs Assessment

A Housing Needs Assessment (HNA) carried out for the Roman Road Neighbourhood Forum by Arc4 indicates the area is mostly populated by younger people living as 'single people', or 'cohabiting couples with no children' households. Consequently there is a greater proportion of 1-bedroom and 2-bedroom dwellings. The population projections show that the older population is set to more than double by 2041, most of whom require the ability to downsize to 1 bedroom homes.

The HNA indicates that more than 75% of households are unable to afford market housing of any kind whether private rent or private home ownership due to the high cost of housing in the area. This has led to owner occupation becoming one of the lowest in the country and indicates a latent demand for intermediate affordable housing products such as shared ownership, discount market, or affordable starter homes. Furthermore it has led to a high turnover of residents who are living in temporary or short-term accommodation. This Neighbourhood Plan seeks to establish sustainable, inclusive and mixed communities that encourage longer term residents to stay and provide opportunities for new residents to stay longer term.

The HNA has established that the flow of unmet affordable need is an average of 86 dwellings per annum in Bow East over the 5-year period to 2024. Furthermore Bow East has a higher proportion of residents assessed as homeless than is average in Tower Hamlets. Therefore unless there is an increase in the vacancy rate from the existing affordable housing stock, the capacity of affordable housing would need to double in approximate terms to generate sufficient supply on an annual basis to meet this requirement.

### 8.3 Site Allocations

This section identifies sites suitable for housing development.

For each site allocation the policies in this section will be applied by the local planning authority in determining planning applications. Detailed information is provided for each site, including location, the site area, relevant planning history, any development constraints and land use proposals. An indicative housing capacity has not been included.

#### 8.3.1 Policy

**POLICY H1: SITE ALLOCATION & GENERAL HOUSING DEVELOPMENT POLICIES**

1. The following sites are allocated for housing:

- .....
- Under Review by AECOM

#### 8.3.4 Conformity with other policies

##### **Intend to Publish London Plan (2019), Chapter 4, Policy H2**

Although larger sites are scarce, smaller sites with the potential for housing delivery are dotted throughout the area. Policy H2 in the London Plan supports the development of small sites stating that they *“should play a much greater role in housing delivery and boroughs should proactively support well-designed new homes on small sites”*

## 8.4 Designing for communities

Good housing design and public realm is covered in the Local Plan. The focus of good design in this policy is the designing to enhance community interaction within a housing development. One key move is the creation of mixed tenure blocks. The other is shared semi-private communal spaces or gardens, which would provide a place for social interaction and the promotion of the sense of community.

### **The former St. Clement's Hospital, site of London's first community land trust**



## 8.5 Community-led housing

### 8.5.1 Key Issue

Community-led housing has been actively promoted and funded by the government in the last few years as a way of closing the gap between housing demand and supply. The justification is that the community is the best proxy for knowing what types of houses should be built in an area. Many new housing developments do not provide the types of housing that are needed by the community, or the community is not given priority when units become available.

Community Land Trusts and community-led housing groups are playing an increasingly important role in stewarding land for building affordable homes. Roman Road Community Land Trust (RRCLT) was formed in 2019 to champion community-led housing and to work with developers and landowners to build genuinely affordable, good quality homes in Bow.

### 8.5.2 Policy

## **POLICY H2: COMMUNITY-LED HOUSING**

**In order to ensure the provision of community-led housing that meets community need:**

- A. Where intermediate housing is proposed, developers are encouraged to work with Roman Road Community Land Trust to provide Community Land Trust housing.**
- B. New residential developments where intermediate housing is proposed are to submit an offer for these homes to local community-led housing organisations before opening it to the market.**
- C. The provision of community-led housing that meets community need is strongly encouraged.**

### **8.5.2 Justification**

The level of housing need for the borough as a whole far outstrips supply. In tackling the need the Council states:

'We make the third largest contribution to the UK economy of any London borough but we've also got the third highest number of people on our housing register.

The borough is home to almost 17,000 businesses and 278,000 jobs but the average cost of renting a flat here is now more than the average household income.

Our population is expected to grow by 50,000 in the next ten years. That's less time than it would take for a family joining the housing register today to bid successfully for a four bedroom home.

There are more than 19,000 households on the housing register in need of an affordable home and over 2,000 households living in temporary accommodation. But each year, only 1,800 homes become available to let to applicants on the housing register.

More new homes were built in Tower Hamlets in 2018 than anywhere else in the UK, but with the average house price now 22 times the average salary, our residents can't afford to buy them.<sup>52</sup>

Many new housing developments do not provide the types of housing that are needed by the community, or the community is not given priority when units become available. Furthermore there are currently very few affordable housing developments underway in the area. One solution to meet the needs of the local community is to support community-led housing developments to reduce the unmet demand.

There is a community aspiration to develop more community-led housing schemes including initiatives such as the Roman Road Community Land Trust. In order to meet the need for affordable housing, smaller non-profit housing developers and community led developers have

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<sup>52</sup> [https://www.towerhamlets.gov.uk/ignl/housing/Tackling\\_the\\_housing\\_crisis.aspx](https://www.towerhamlets.gov.uk/ignl/housing/Tackling_the_housing_crisis.aspx)

to be supported to fill the gap. Supported by 'Draft London Plan 2018 Chapter 4 Policy H2'  
Further information on community led developments is detailed in the community led housing  
section in the evidence base.

## Objective 6: Resilient and well-networked community infrastructure

### 9.1 Summary of current issues

### 9.2 Creating a resilient network of community facilities

Community facilities identified in the neighbourhood plan area are defined in this document as places or spaces that are **run solely for community benefit**, typically by voluntary groups, charitable or public sector organisations. They receive some level of public funding and perform wider health and wellbeing, social or educational benefits to residents.

A mapping exercise was carried out to identify all the local community facilities, by sector, that fall within the neighbourhood plan boundary (see evidence base, page **xx**).

#### 9.2.1 Action

##### **Action CF1: Forming a consortium of community groups**

Building a sense of belonging and identity through local social networks and shared community experiences are important foundations for communities *[ref]*, particularly for areas such as Bow where there are a diverse mix of new and existing populations of different ages and ethnicities *[incl link to evidence here]*. Many places of worship in the Roman Road Bow neighbourhood plan area provide important outreach to the local community and support the communities' diverse ethnicities. Examples include Holy Trinity Church and its arts programme, Tower Hamlets Community Church's involvement in a borough-wide winter night shelter, The Bow Muslim Community Centre provides Arabic and Bengali classes for children and The Gurdwara Sikh Sangat teaches Punjabi and Gatka (an Indian martial art) classes.

Forming a consortium of groups and organisations in the neighbourhood plan area will enable better use of limited resources and allow future funding for community infrastructure to be allocated where it is most needed, looking across the range of facilities.

#### 9.2.2 Conformity with other policies

##### **Tower Hamlets Local Plan, section 12, S.CF1: Supporting community facilities**

- "1. Development which seeks to protect, maintain and enhance existing community facilities will be supported.*
- 2. Development will be required to contribute to the capacity, quality, usability and accessibility of existing community facilities, particularly where development will increase demand.*
- 3. Development should maximise opportunities for the provision of high quality community facilities to serve a wide range of users. Where possible, facilities or services should be accessible to the wider*

*community outside of core hours and co-located or shared to encourage multi-purpose trips and better meet the needs of different groups.*

*4. New community facilities will be directed towards the borough's centres in accordance with the town centre hierarchy and/or to locations which are accessible to their catchments depending on the nature and scale of the proposal." (p128)*

## 9.3 Community Asset Transfer<sup>53</sup>

### 9.3.1 Action

#### **Action CF2: Community Asset Transfer**

Bow Arts Studios and Nunnery Gallery, Chisenhale Gallery and dance studios, and The Arts Pavilion, all within the Roman Road Bow neighbourhood plan area, have a wider reach beyond the immediate neighbourhood, attracting visitors into the area and upholding Bow's reputation as a neighbourhood that supports the creative arts.

In order for these existing arts facilities to continue sustainably and to allow organisations to control adaptation of existing facilities more directly, opportunities should be sought to allow groups to take over the lease of buildings, where they are currently owned by Tower Hamlets Council, using Community Asset Transfer.

The potential benefit of listing more Assets of Community Value in the plan area is recognised. The community is strongly encouraged to nominate facilities that are of value to them.

### 9.3.2 Justification

Chisenhale Gallery is a prime example, where transfer of ownership of land and buildings on the Chisenhale site by Community Asset Transfer at less than market value could be of great benefit. The purpose of the transfers would be to help secure the industrial heritage of the Chisenhale site and strengthen its sustainability and long term use for the arts and other community uses.

Chisenhale Gallery has occupied part of the ground floor of a former veneer factory on Chisenhale Road since 1982. Adjacent to the gallery on the ground floor, as well as on the upper floors of the building above the Gallery, are 38 artists' studios run by Chisenhale Art Place Trust, and next door Chisenhale Dance Space occupies the top floor of a former brewery building. The three organisations, now run as separate charities, began life together when artists took on a lease to the then derelict site from Tower Hamlets Council in 1980.

Apart from providing revenue to the Council, there seems little rationale for the local authority to retain ownership of this valued community asset. The current ownership structure may actually hamper long-term initiatives by the charities occupying the building to improve it, and bring back into use large empty and neglected spaces. This is due to the financial restrictions

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<sup>53</sup> <https://mycommunity.org.uk/what-are-assets-of-community-value-acv>

and complexities associated with raising funds capital works on a building which they don't own.

## 9.3 Additional and improved sports and play facilities

### 9.3.1 Key Issue

### 9.3.2 Policy

#### **Policy SP1: Additional and improved sports and play facilities**

In order to meet the needs of the growing population of children and young adults in the neighbourhood plan area, space should be found for additional sports and play facilities, either as part of new development or from CIL funding allocated in the area.

Planning applications that propose the provision of sports and play facilities for children and young people will be viewed favourably. New residential developments will be expected to demonstrate that they have assessed the likely needs of the new resident under-16 population and have sought, where possible, to address these needs.

Proposals to improve the quality of existing sports and play facilities at Mile End climbing wall and Roman Road adventure playground will be strongly supported. Where appropriate, developer contributions will be used to address these needs.

### 9.3.3 Conformity with other policies

#### **Tower Hamlets Locality Profiles: North East Locality, March 2019**

*"Tower Hamlets, overall, is expected to see its population rise by 29% by 2030 compared to its estimated population in 2015. During the same period, the NE Locality is projected to also see its population rise although at a slightly lower rate of 21%. This varies by ward, with Bow East projected to almost double in size and Bromley-by-Bow to increase by about third, whilst Bow West is expected to see its population decline slightly." (p8)*

### 9.3.4 Justification

#### **Morpeth School pupil survey**

The under-provision of sports and play facilities is reflected in the survey carried out with Morpeth pupils aged between 12 and 15 in 2016, where respondents highlighted a desire for more or better youth leisure provision and 65% of surveyed students mentioned leisure facilities as important.

#### **Mapping of existing community facilities**

Only two out of the 40 mapped facilities in the area were for sports and play: Mile End climbing wall and Roman Road adventure playground.

## 9.4 Policy for new and improved youth work facilities

### 9.4.1 Key Issue

### 9.4.2 Policy

#### **Policy YW1: for new and improved youth work facilities**

Where it is possible for developer contributions to provide new youth facilities, for example, at Chisenhale Gallery, and on the Malmesbury and Lockton estates, these will be supported.

Proposals to improve the quality of existing youth facilities at Eastside, Green Light Youth Club and St Paul's Old Ford will be strongly supported. Where appropriate, developer contributions will be used to address these needs.

### 9.4.3 Justification

#### **Tower Hamlets Voluntary and Community Sector Strategy 2016-2019**

The provision for youth activity groups is under-represented in the neighbourhood plan boundary compared to the borough as a whole<sup>54</sup>. The neighbourhood plan area has only three youth focussed facilities out of the 40 mapped facilities: 31 Squadron Air Cadets, Green Light Youth Club and Eastside Youth and Community Centre.

#### **Morpeth School pupil survey**

The Morpeth pupil survey identified only 6% of respondents as using youth clubs; however; 22% said they wanted more youth facilities in their neighbourhood.

## 9.5 Policy to improve existing community centres

### 9.5.1 Key Issue

### 9.5.2 Policy

#### **Policy CC1: to improve existing community centres**

Purpose-built community centres in housing estates in the neighbourhood plan area (such as the Ranwell Community Centre and the Caxton Community Centre) are underused and need maintenance and upkeep.

In order for these and other facilities, such as the Arts and Ecology Pavilions, to continue to provide useful meeting space for community groups and to sustain themselves into the future, CIL funding should be allocated to support, maintain and improve these facilities.

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<sup>54</sup> Tower Hamlets Voluntary and Community Sector Strategy 2016-2019 (p11)

### 9.5.3 Conformity with other policies

#### Tower Hamlets Local Plan, chapter 7, S.CF1: Supporting community facilities

*"1. Development which seeks to protect, maintain and enhance existing community facilities will be supported.*

*2. Development will be required to contribute to the capacity, quality, usability and accessibility of existing community facilities, particularly where development will increase demand.*

*3. Development should maximise opportunities for the provision of high quality community facilities to serve a wide range of users. Where possible, facilities or services should be accessible to the wider community outside of core hours and co-located or shared to encourage multi-purpose trips and better meet the needs of different groups.*

*4. New community facilities will be directed towards the borough's centres in accordance with the town centre hierarchy and/or to locations which are accessible to their catchments depending on the nature and scale of the proposal." (p128)*

## 9.6 Action to improve accessibility of health and social care facilities

### 9.6.1 Key Issue

#### Mapping of local health and social care facilities

The mapping exercise (see page xx in the evidence document), showed that health and social care facilities are not easily accessible for residents in some parts of the neighbourhood plan area, in particular, those living in the eastern part of the Fairfield neighbourhood area are approximately 12 minutes walk from the nearest doctor's surgery.

[RCA student maps showing health facilities and NE locality profile has maps showing locations of GP surgeries, pharmacies etc. Pages 113-114

[https://www.towerhamlets.gov.uk/Documents/Public-Health/JSNA/LBTH\\_NE\\_LOCALITY\\_PROFILE.pdf](https://www.towerhamlets.gov.uk/Documents/Public-Health/JSNA/LBTH_NE_LOCALITY_PROFILE.pdf)]

### 9.6.2 Action

#### Action HSC1 Improving access to health and social care facilities

Tower Hamlets Council, local NHS and other service providers to work towards more equal access to health and social care services across the neighbourhood area.

### 9.6.3 Conformity with other policies

#### Tower Hamlets Infrastructure Delivery Plan (2017)

The plan seeks to ensure that appropriate policies are in place for creating Healthy Place (p45) as well as providing new facilities where need is identified (p47-48). There are no proposals in the current plan to provide additional health facilities in the Roman Road Bow Neighbourhood Plan Area.

## 10.0 Non-policy actions

The following table summarises issues referred to in the neighbourhood plan which aren't directly related to land use. Tackling them has the potential to contribute to sustainable economic, social and environmental development in the neighbourhood area.

**TABLE9.1 Non-land use issues to be addressed**

Paragraph	Concern	Aspiration/Action	Lead agency and partner(s)
<b>Local economy</b> 4.4.2LE1	Bow House Business Centre's long-term future	Planning applications will be encouraged that support Bow House Business Centre as a provider of affordable workspace for local businesses and other organisations.	Owner of Bow House and LBTH
4.5.2 LE2	Sustained support for job seekers and local businesses	Continued funding of Workpath and Ready programmes; strengthening of links between local employers and schools	LBTH, local employers, schools
4.6.2LE3	Limited local cross-sector collaboration	linking economic development, regeneration and environmental improvements, and partnerships in Bow across public, private and voluntary sectors. This is aimed at facilitating inclusive growth and economic and community development.	LBTH, local industry, voluntary sector
<b>Green Streets</b> 5.3 GS1	Inadequate walking and cycling provision	safer walking and cycling routes; school streets; blue badge parking; step-free access at Mile End underground.	LBTH, local schools & parents, TFL

<p><b>Heritage</b> 7.3.2 H1</p>	<p>Lack of new models for public houses</p>	<p>Council to facilitate new models of pubs coming forward, and broaden the locations in which proposals might be acceptable</p>	<p>LBTH and hospitality sector</p>
<p>7.4.2 H2</p>	<p>Wayfinding &amp; heritage trail</p>	<p>Implementing the 2017 Green Grid Strategy to include better wayfinding and integration with TFL's Legible London signage.</p>	<p>LBTH and TFL, Local History Library, Queen Mary College</p>
<p><b>Community Infrastructure</b> 9.2.1 CF1 Consortium of community groups</p>	<p>Lack of joined up planning of community services</p>	<p>A consortium will enable better use of limited resources and allow future funding for community infrastructure to be allocated where it is most needed, looking across the range of facilities.</p>	<p>LBTH, voluntary sector, Tower Hamlets Council for Voluntary Service (THCVS), Neighbourhood Forum</p>
<p>9.3.1 CF2 Community asset transfer</p>	<p>Current ownership of buildings sometimes hampers long-term development</p>	<p>Opportunities to be sought to allow groups to take over the lease of buildings, where they are currently owned by Tower Hamlets Council, using Community Asset Transfer.</p> <p>The potential benefit of listing more Assets of Community Value in the plan area is recognised. The community is strongly encouraged to nominate facilities that are of value to them.</p>	<p>LBTH, the voluntary sector, other local organisations</p>
<p>9.6.2 HSC1 Health &amp; social care facilities</p>	<p>Unequal access to facilities</p>	<p>Work towards more equal access to health and social care services across the neighbourhood area.</p>	<p>LBTH, local NHS and other service providers</p>

## 11.0 Policies map

To be added once we have the policy framework reasonably well advanced.

## 11.0 APPENDICES

### Thriving local high street and economy

#### 4.1 The National Context

The 2019 report, [‘High Streets and Town Centres in 2030’](#)<sup>1</sup> identifies major trends that have made it harder for local high streets to thrive, including the growth of online shopping. Four structural issues were identified:

- Too much retail space, with retail acting as the main anchor for many high streets.
- Fragmented ownership, which makes working collectively with local businesses very hard.
- Retailers’ high fixed costs: business rates and rents. The retail sector accounts for 5% of Gross Domestic Product (GDP) and pays 25% of business rates.
- Business taxation. Government action is needed to level the playing field between online and high street retailers.

**‘Achieving the large-scale structural change needed will require an intervention led by the local authority, using all its powers and backed by cross-sector collaboration. However, given the financial pressure faced by local authorities, central government funding will be needed for this, as well as significant private sector investment.’**

The [‘Future High Streets Fund’](#) is an example of the sort of intervention needed at a national level. The Covid19 pandemic only strengthens the case for such national government intervention.

#### 4.2 The London-wide context

The draft new [London Plan](#)<sup>3</sup> 2020 includes Policy E3: [Affordable workspace policy](#) (p. 271). This states that ‘In defined circumstances...,planning obligations may be used to secure affordable workspace (in the B Use Class) at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose...’

Policy HC6: Promoting the night-time economy. The Draft London plan actively promotes local night-time economies

#### 4.3 The Tower Hamlets context

‘Tower Hamlets has an above average unemployment level within Greater London, with a very low proportion of Tower Hamlets’ residents actually finding employment within the borough. Currently only 15% of jobs within Tower Hamlets are taken up by local people. There is also a skills mismatch, with new employment opportunities requiring skills which are not widely available within the borough’s current residential population.’ ([TH Draft Planning Obligations SPD March 2020](#))

Priority 3 of the Tower Hamlets Growth and [Economic Development Plan 2018-2023](#) is to create the conditions for business growth. The focus of the plan is ‘to help connect our residents and local businesses to growth and economic development.’

#### 4.5 Other evidence and relevant local policies for Bow

The Roman Road Footfall Report recommends the stimulation of the evening and leisure economies ([Google Drive\RRT Reports](#)).

Mile End Old Town Residents Association (MEOTRA) identified the proliferation of hot food takeaways as an issue. This is addressed by Tower Hamlets Local Plan Policy D.TC5, which places a number of restrictive criteria on hot food takeaway applications.

A 2019 research project by [QConsult students from Queen Mary College](#) explored the potential for local businesses to apply for dual or multiple use classes for their premises, rather than relying on a single use class, such as A1 (retail) or A3 (cafes and restaurants). This would provide greater flexibility in how premises are used, but it was found that there was limited awareness of this option. More publicity would be needed, and the study recommended higher priority be given to other measures, such as increased professionalism and more joint initiatives among businesses to promote the Roman Road.

Parking was an issue raised by traders. Businesses consider lack of parking one of the major issues affecting their activities and footfall, although evidence for this is lacking. A 2018 [QConsult survey](#) of transport and shopping habits concluded: 'Comparing the economic spend of car users to that of walkers, we see that the visitors that walk to Roman Road spend more weekly. Whereas, the car users have a weekly expenditure that is similar to cyclists. The car users predominantly live locally with postcodes in the E1, E2 and E3 area. However, there are 5 people with postcodes outside this range.'

The [Mainyard Studios](#) in Bow Road is an example of the type of flexible, reasonably priced space that is needed. It provides private offices, music studios, creative spaces and coworking to entrepreneurs. [Impact Hub Islington](#) is another good example of a shared working and learning space.

[Stiches London](#), a tailoring and alterations shop in the Roman Road market is another example of a small business meeting a practical need which can't be met online.

### **London Plan 2020, Policy E3 Affordable workspace.**

A. In defined circumstances set out in Parts B and C below, planning obligations may be used to secure affordable workspace (in the B Use Class) at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose such as:

- 1) for specific sectors that have social value such as charities, voluntary and community organisations or social enterprises
- 2) for specific sectors that have cultural value such as creative and artists' workspace, rehearsal and performance space and makerspace
- 3) for disadvantaged groups starting up in any sector
- 4) supporting educational outcomes through connections to schools, colleges or higher education

5) supporting start-up and early stage businesses or regeneration.

B Consideration should be given to the need for affordable workspace for the purposes in Part A above:

1) where there is affordable workspace on-site currently, or has been at any time since 1 December 2017, except where it is demonstrated that the affordable workspace has been provided on a temporary basis pending redevelopment of the site.

2) in areas identified in a local Development Plan Document where cost pressures could lead to the loss of affordable or low-cost workspace for micro, small and medium-sized enterprises (such as in the City Fringe around the CAZ and in Creative Enterprise Zones)

3) in locations identified in a local Development Plan Document where the provision of affordable workspace would be necessary or desirable to sustain a mix of business or cultural uses which contribute to the character of an area.

C Boroughs, in their Development Plans, should consider detailed affordable workspace policies in light of local evidence of need and viability. These may include policies on site-specific locations or defining areas of need for certain kinds of affordable workspace.

D Affordable workspace policies defined in Development Plans and the terms set out in Section 106 agreements should ensure that the objectives in Part A above are monitored and achieved, including evidence that the space will be managed by a workspace provider with a long-term commitment to maintaining the agreed or intended social, cultural or economic impact. Applicants are encouraged to engage with workspace providers at an early stage in the planning process to ensure that the space is configured and managed efficiently.

E Leases or transfers of space to workspace providers should be at rates that allow providers to manage effective workspace with submarket rents, meeting the objectives in Part A, over the long term.

#### **[Tower Hamlets Workspace Strategy: Initial Statement Local Plan Evidence Base June 2017](#)**

**Definition of Flexible Workspace.** For the purposes of this report, flexible workspace means “managed, commercial premises, particularly suitable for small or start up enterprises and which are divided into a collection of small units held by occupiers on a short-term, easy-in, easy-out basis and with communally-shared services, facilities and support for the entrepreneurial or vocational activities of the occupiers.”

**Definition of Affordable Workspace.** For the purposes of this report, however, “affordable workspace” means “flexible workspace which is let to a workspace manager, and which will allow for occupation by the end users in one or more sectors on terms: substantially below market levels of rents and charges when compared with an equivalent letting of the space and facilities on the open market; and at a rate comparable with similar facilities available in Tower Hamlets or (if sufficient comparator premises do not exist in the borough) across London as a whole; and

at rates which mean that occupation is feasible to a large number of small/start-up businesses in the relevant sector(s)." (page 2)

**Paragraph 5.9 of the 2018 Tower Hamlets [Affordable Workspace Evidence Base Policy](#)**

**Review** 'We note that in the proposed policy the space is not protected 'in perpetuity' but only for a minimum of 10 years. One recent plan inspector considered that this 'in perpetuity' clause was needed to deliver the policy objectives. So, the council may need to consider whether this amendment is needed in the future – there is a risk that with a shrinking tenancy period an affordable provider does not invest in their offer.'