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CONSULTATION STATEMENT - SEPTEMBER 2021

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1 CONSULTATION PROCESS

1.1 Introduction

This Consultation Statement has been prepared to meet the legal requirements of the Neighbourhood Planning Regulations 2012 (as amended) in respect of the Roman Road Neighbourhood Plan (RRBNP).

The legal basis of this Consultation Statement is provided by Section 15(2) of Part 5 of the 2012 Neighbourhood Planning Regulations (as amended), which requires that a consultation statement should:

• contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;

• explain how they were consulted;

• summarise the main issues and concerns raised by the persons consulted; and

• describe how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

The policies contained in the RRBNP are as a result of sustained interaction and consultation with local residents, businesses and community groups within the plan area.

Consultation process

1.2 Establishing the Neighbourhood Plan Area and the Forum 2016-2017

2016

1.2.1 First public meeting. In February 2016, the first public meeting was held at St. Paul's church in St. Stephen's Road. This was initiated by the Roman Road Trust. It was publicised through the network of local groups and the Trust's newsletter. It aimed to inform people about the neighbourhood plan process, seek their views on the plan area and encourage ideas about how the area could be improved.

1.2.2 Steering group formed. A steering committee was then formed. This initially met fortnightly, identified potential themes for the plan, and considered further the area the plan would cover.

1.2.3 Further public meetings. Several smaller public meetings were held to consult over the plan area. It was decided to omit Fish Island as it had its own Action Plan, but residents of Cadogan Terrace were keen to be included. There was support for the southern boundary to be Mile End and Bow Road, rather than the railway line further north that runs through the area.

A local engagement event discussing the plan area

1.2.4 London Borough of Tower Hamlets. Early engagement was established with the Plan Making Team of Tower Hamlets Council. Initial support was provided by Strategic Planner, Ellie Kuper Thomas, and from 2019 onwards, by Principal Planning Officer, Steven Heywood. We also informed ward councillors in Bow West and East about the aim to develop a neighbourhood plan, and have kept them updated on progress.

1.2.5 LBTH consultation on plan area. A Council consultation on the plan area was held from 11th November 2016 and 23rd December 2016.

2017

1.2.6 Plan area designated. 6 February 2017: Tower Hamlets Council formally designated the Neighbourhood Plan Area.

1.2.7 Forum constitution. In March 2017 a public meeting was held at Chisenhale Art Space where a draft Forum constitution was presented, and next steps discussed.

1.2.8 LBTH consultation on Forum. A Council consultation on the proposed Forum was held from 8th June to the 19th July 2017.

1.2.9 Designation of Forum. On 16 August 2017 Tower Hamlets Council formally designated the Roman Road Bow Neighbourhood Forum, the body responsible for overseeing the development of the plan.

2. ENGAGEMENT STRATEGY AND IDENTIFYING THE ISSUES, 2016-2019

2.1.1 The Forum was keen to engage with as broad a range of local groups as possible. Contact was established with various organisations, including Mile End Old Town Residents Association, which has a strong commitment to conserve the character and appearance of the area around Tredegar Square. Other groups included Ability Bow (an accessible gym), local GP practices, faith groups, arts organisations, schools, youth and housing groups. Most of these were visited in person, and others contacted by email or phone.

2.1.2 Neighbourhood plan leaflet. We produced a leaflet that was distributed to households across the plan area. This explained about neighbourhood plans, and invited people to get involved. (See evidence base to view leaflet).

2.1.3 Consultation strategy. By mid 2016 the strategy below was agreed, and the area was sub-divided into 8 sub-areas. The Forum sought champions for each of the sub-areas to represent their patch.

2.2 Engagement strategy

Introduction

2.2.1 Over the next eight months, (July 2016 - February 2017), the Neighbourhood Forum Committee worked with the local community to shape the content of the Neighbourhood Plan. This meant engaging people in different ways to discuss and develop the objectives set out in the Constitution that underpinned the policies and projects forming the Plan.

2.2.2 Alongside this work, we gathered evidence to support emerging ideas. Understanding Tower Hamlets planning policies was also critical over this period, to ensure the Neighbourhood Plan acknowledged and didn't repeat the relevant local authority policies.

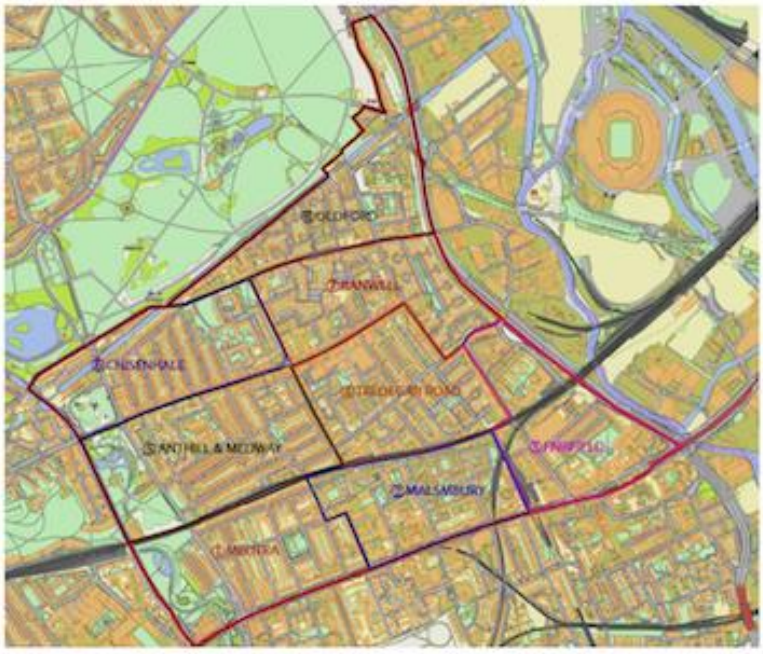
Our approach to engagement

2.2.3 To date, our approach had been to engage with the community over several events spread over a period of months. As we moved forward to the more complex aspects of the neighbourhood plan preparation, we were aware of the risk of consultation fatigue and engagement of only a fraction of the demographic in the area. We decided to use our main themes set to help build consistency across our engagement, and the Ambassadors to reach closer into sub-neighbourhoods.

2.2.4 Ambassadors

Individuals living in sub-areas of the neighbourhood plan boundary, were recruited where possible in support of their neighbours to provide a finer grain engagement identifying

more localised issues and opportunities. The ambassadors served as a conduit between the Forum Committee and the wider community.



2.2.5 We identified eight areas within the plan boundary: MEOTRA (Mile End Old Town Residents Association), Malmsbury, Fairfield, Tredegar Road, Antil and Medway, Chisenhale, Ranwell and Old Ford.

Themes

2.2.6 Our Constitution lists seven objectives, under the overarching principle of a cohesive community built around a flourishing high street. These had already been discussed with forum members at our AGM. The themes were:

a) Supporting our local businesses and traders.
b) Improving our public realm, green and open spaces, and underused space.
c) Increasing community capacity infrastructure.
d) Working towards a safer and cleaner neighbourhood.
e) Improving connectivity and accessibility of movement into and around the area.
f) Ensuring development supports and enriches our community and high street.
g) Protecting the area's heritage and celebrating our diverse identities and cultures.

What we did

2.2.7 We adopted a more varied approach that allowed participants to engage with the plan in very different ways - from light touch, arm's length means to more involved approaches such as neighbourhood walks.

2.2.8 In order to build up momentum and engage the community in a way where they could quickly see progress in the development of the plan, we developed this strategy over the next two/three months, announcing forthcoming events in the autumn and running them up to February 2018.

2.2.9 Activities that complemented the development of the strategy included:

A. **Questionnaires, using online platforms (such as Placecheck)** to gather wider opinions from residents who did not wish to engage intensely through ambassadors.

B. **Informal methods aimed at harder to reach communities and groups**, using a community garden project to engage through one-to-one conversations rather than formalised sessions.

Engagement event in the Tredegar sub-area

2.2.10 The Forum had access to an architect from the Erasmus for Young Entrepreneurs Programme (Daniella Ricci). Daniella was able to draw people's comments and opinions on a 3D map created by Public Works.

Previous studies

2.2.11 Some desktop research was also undertaken to reference previous studies carried out in the area, as well as to tracking local planning policy commitments. This work also supports our evidence base.

Live music helped create an informal atmosphere to eventsHard to reach groups

2.3 How we publicised activities

2.3.1 The series of events were publicised through personal contact by the sub-area champions, and by committee members through leafleting. On the day, a ‘market barrow’ specially built for the purpose and stationed outside event venues was used to display posters for the events.

The 'market barrow’ used to advertise events

Other methods of outreach included:

2.3.2 Olga primary school workshops. The events included 5 weekly workshops with year 3 as part of the geography curriculum, ‘Living Together’. These sessions aimed to bring out children’s thoughts on what they would want in their neighbourhood, which are included in the engagement report (page 95).

2.3.3 Market stalls. These were held to publicise the initiative and invite people to join the Forum.

2.3.4 Online presence. The Forum arranged an online presence through Placecheck, which enabled people to post comments on what they liked, disliked and thought could be improved in the plan area. (See Forum website for map and comments).

2.3.5 Hard to reach groups. Contact was made with local faith groups, with visits including, the mosque in the Roman Road market, the Sikh Gudwara in Harley Grove and Bangladeshi Hindu temple near Mile End. Despite our efforts to find innovative ways to engage, it has remained challenging to involve members of local BAME communities. This may be partly due to the plan-making process feeling remote from people's daily concerns.

2.3.6 Housing. The issue of lack of local affordable housing was raised, and the Forum responded by supporting the development of the Roman Road Community Land Trust (CLT). This was pioneered by architect and Forum member, Sarah Bland, to work towards developing genuinely affordable housing in Bow. The CLT was registered as a Community Benefit Society in May 2019.

2.3.7 The business community. In 2019 the Forum worked with the Roman Road Trust on a project to engage the business community. A 'Q Consult' student team from Queen Mary College, Mile End, carried out a survey of 50 businesses in the area to explore the potential for greater flexibility in the use of business premises through multiple use classes. This project also helped raise awareness about the neighbourhood plan, and anticipated the national change in planning use classes in 2020. The team produced a report of their research in December 2019, which is in our evidence base.

Antill & Meotra event in the Ecology Pavilion

2.4 Gathering, consolidating and sharing evidence

2.4.1 Secondary school student survey, July 2016. An example of our efforts to engage young people is the survey completed by 54 students aged 12-15 years attending Morpeth secondary school. 63% of participating students were of Asian background, with 13% each of white British and African heritage. Four other ethnic groups comprised the remaining 23%. A key finding was that 65% of students mentioned leisure facilities of some kind,

demonstrating a clear desire for more or better youth leisure provision. The survey is in our submitted evidence under 'Supporting Reports/ Community Infrastructure'.

2.4.2 Engagement Report In our outreach events across the area we asked people to identify things they liked about their neighbourhood, things they disliked and things that needed working on to improve.
Findings from our outreach in the sub-areas were consolidated in a spreadsheet, and then written up in the Engagement Report produced for the Forum by Public Works. The report is in our submitted evidence.

2.4.3 Forum AGM and workshop, April 2019 The findings of the different themes in the engagement report were shared at a workshop in April 2019 that was held alongside the Forum's Annual General Meeting. This provided feedback on the evidence gathered. Feedback included the following:
Business - there was a lack of effective communication between businesses on common issues; concern over high rents and lack of parking; wish for more restaurants open in the evening.
Green streets and public places: support for more trees along pavements, reduction in parking and creating parklets; the area around Holy Trinity church could be opened up; improvement to public realm outside Idea Store and on housing estates;
Heritage and community infrastructure: better care is needed of canal bridges, and there was support for bringing back into use derelict parts of the Chisenhale building; concern about lack of enforcement of planning conditions/building regulations in conservation area; support for more community-based youth work;
Housing: the need for more affordable housing was reiterated.

2.5 External help with gathering evidence and identifying issues

2016-2018

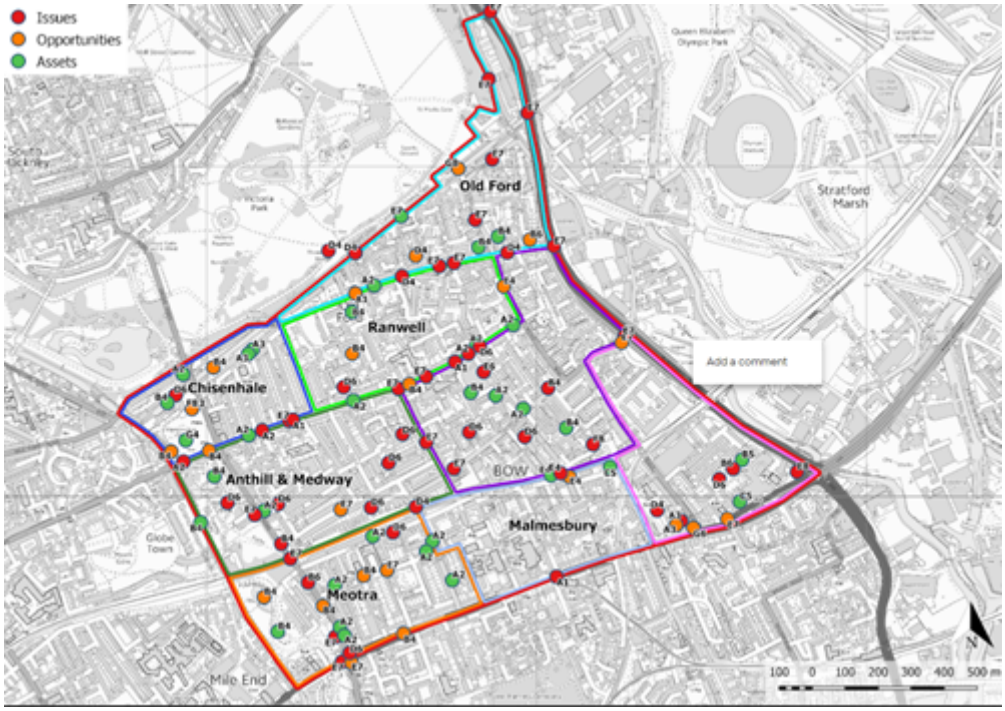
2.5.1 Pro Bono support. Torange Khonsari, then senior lecturer in architecture at Metropolitan University and director of Public Works, provided invaluable help with our overall engagement strategy, specific events and devising imaginative ways to reach less accessible groups. One example of this is the Community Orchard in Butley Court, which attracted a Bengali group and the over 60s living nearby.

2.5.2 Erasmus programme. Through our contact with Public Works we benefited from the hard work and creativity of Daniella Ricci. Daniella built a mobile barrow, which was used to attract passers-by and publicise Forum events. Daniella subsequently provided help with formatting the plan.

2019-2021

2.5.3 Consultancy. Through the Ministry of Housing, Communities and Local Government grant support, the Forum was able to appoint Chris Bowden of Navigus Planning, as our consultant. Chris provided support for our community engagement and analysis of

evidence, and in 2019 produced ‘heat maps’ showing the evidence in visual form (in the consultations folder). He also helped us with gathering technical evidence on key themes, and with drafting of plan policies.



Composite heat map showing assets, issues and opportunities across sub-areas

2.5.4 Bartlett School of Planning. In 2019 post-graduate students from the Bartlett School of Planning, University College London, worked with the Forum and produced a report ‘Green Spaces and Connectivity’ focusing on these aspects of an emerging plan which had been identified through earlier public engagement. This and the accompanying poster provided visually attractive information that was accessible to a wide range of people. Students participated in the workshop in April 2019, where their work was shared.

1. POLICY RESEARCH AND WRITING THE DRAFT PLAN 2019-2020

3.1 Desktop research. We undertook desktop research into the wider policy context of the neighbourhood plan, including the National Planning Policy Framework, the new London Plan 2021 and Tower Hamlets Local Plan 2031.

3.2 First draft of plan. A first skeleton draft plan was written by the committee late in 2019, whilst continuing background research into the wider planning context.

2020

3.3 Covid 19. The storm clouds of the pandemic were gathering early in 2020, with the first lockdown starting in March. The pandemic brought our in-person public engagement to a halt, and the Forum was forced to rely mainly on online communications. Most of our

evidence gathering for the plan had been carried out, and more time was now given to policy writing and marshalling of our evidence in support of plan policies and actions.

3.3 Housing Needs Assessment (HNA). A housing needs assessment for Bow was completed in March 2020. This was funded by a further MHCLG neighbourhood planning grant, and carried out by Arc 4, a specialist housing consultancy. This provided further valuable evidence of the unmet housing need in Bow, and in particular, the shortage of 1-bedroom housing. The HNA is in our evidence base

3.4 Writing of draft plan. The Forum committee continued to meet monthly online. From April the committee focused on fleshing out the skeleton plan, ensuring its policies were sufficiently focused at neighbourhood level and justified by strong evidence.

3.5 Royal College of Art mapping exercise. Through Eddie Blake, a committee member, valuable help was provided over the summer of 2020 by architecture students at the Royal College of Art, who photographed and mapped the many locations mentioned in the plan.

3.6 Online AGM and presentation of draft plan. In October the Forum Annual General Meeting was held online for the first time, and was followed by a short presentation of the main themes of the draft plan. Three further online sessions were offered for people to hear about and respond to the draft plan, but these were not taken up.

4. REGULATION 14 CONSULTATION

2021

4.1 Preparing for and running the consultation

4.1.1 Regulation 14 consultation. The first months of the year were spent refining the draft plan, organising supporting evidence and having the draft plan formatted to a professional standard in Indesign by Daniella Ricci, our former Erasmus worker.

4.1.2 In consultation with Steven Heywood, Principal Planning Officer in the Plan Making Team at LBTH, due to Covid restrictions in force, it was agreed that the consultation would be conducted online. However, the Forum also had 1,000 consultation leaflets printed (copy in Regulation 14 folder), which were distributed by committee members to residents, businesses and local groups in different sub-areas across the plan area. The leaflet explained how people could comment on the plan, including writing to the Forum by letter, but all responses received were online.

4.1.3 The consultation was just over 6 weeks, **15th March - 25th April 2021**, to allow for the Easter bank holiday. The Forum also publicised the consultation through local social media such as the Forum newsletter sent to around 200 individuals, an article in Roman Road LDN, and the Roman Road Trust monthly newsletter.

4.1.4 An online version of the consultation leaflet was sent to the consultees required by Regulation 14, and their responses are shown in the 'Regulation 14 Representations' document.

4.1.5 Consultees. The following is a list of the consultees contacted:

National Bodies

Environment Agency, Natural England, Historic England, Network Rail, Anglia Rail, Highways Agency, Coal Authority, Ministry of Housing, Communities and Local Government, NHS, Electric and gas companies, Sport England.

London wide bodies

Transport for London, Thames Water, Mayor of London, Fire Service, Met Police.

Local Councils

City of London, London Borough of Hackney, London Legacy Development Corporation,

London Borough of Tower Hamlets

MP Rt. Hon. Rushanara Ali

Other consultees were:

Councillors in Bow East and West wards

Housing Groups

Fairfield Conservation Area Residents' Association, MEOTRA, Malmesbury Residents Association

Clarion Housing, Gateway Housing

Schools & Education

Chisenhale, Guardian Angels, Olga, Old Ford (Paradigm Academy), Malmesbury primary schools, Central Foundation secondary school, Mulberry University Technical College, Phoenix Primary and Secondary School, Queen Mary University (Q Consult)

GP surgeries

Grove Road, Ruston St., St. Stephen's Health Centre, Tredegar

Community groups/charities

Ability Bow, Bow Arts/Nunnery Gallery, Canal and River Trust, Mencap, Kirkland Centre, Mile End Climbing Wall, Tower Hamlets Wheelers, Roman Road Trust

Arts Groups

Bow Arts/Nunnery Gallery, Chisenhale Gallery, Chisenhale Art Place Trust (studios), Chisenhale Dance Space.

Youth Groups

Eastside Youth and Community Centre, Green Light Youth Club, RAF Air Cadets 31 Squadron, Mile End, Roman Road Adventure Playground.

Faith groups

Bow Baptist Church, Bow Central Mosque, Bow Muslim Community Centre, 517 Roman Rd., Guardian Angels Roman Catholic Church, Gurdwara Sikh Sangat Hindu temple, Holy Trinity Morgan St. (Epainos Ministries), Methodist church, Roman Catholic church, St Barnabas (C. of E.), St. Mary's Bow (C. of E.), St. Paul Old Ford (C. of E.), Victoria Park Baptist Church

Local business organisations

Bow Business Centre, East End Trades Guild, Growing Concerns, Roman Road Trust.

5. SUMMARY OF MAIN ISSUES AND CONCERNS AT REGULATION 14 AND, WHERE RELEVANT, HOW THESE WERE ADDRESSED.

5.1 Regulation 14 representations received during 15th March - 25th April 2021, and Forum responses

5.1.1 High St. and local economy. The main issue raised was the tension between the Local Plan policy D.TC2 to protect retail, and the National Planning Policy Framework. The latter argues for greater flexibility to ensure the vitality of town centres, 'by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters.' (Chapter 7, paragraph 85.)

5.1.2 Response. It was acknowledged that the issue of empty existing properties on Roman Road is not primarily a planning issue. Policy LE1 was amended to support proposals outside of the district centre to deliver class E uses that are capable of supporting maker spaces, cultural or leisure activities and social enterprises.

5.1.3 Green Streets. There was general support for this part of the plan to encourage walking and cycling. The main issue raised was the need for greater clarity over how developer contributions will be used to fund improvements - in particular whether Section 106 or Community Infrastructure Levy (CIL) are envisaged.

5.1.4 Response. Detailed amendments to policy wording were made, and consideration was given about CIL being the main means of raising developer contributions.

5.1.5 Beautiful public spaces. The Regulation 14 consultation response from the London Legacy Development Corporation pointed out that the stretch of Wick Lane south of Tredegar Road lies within their boundary. This included the proposed designation of a local green space. Tower Hamlets Council also questioned whether some of the other proposed local green spaces (policy PS2) were 'demonstrably special' and 'hold a particular local significance'.

5.1.6 Response. The Forum responded by excluding the proposed local green space in Wick Lane from the plan, but asserting that the remaining green spaces should be retained as they are precious local green spaces amid dense housing. They needed protection to ensure they were not lost through infill development that has been prevalent in recent years. Given the scarcity of available sites, the Forum could not conceive a way in which proposed green spaces could be developed whilst simultaneously increasing the quantity and quality of nearby open space as part of 'a wider development proposal.' Our policy is needed to protect these small but important amenity spaces.

5.1.7 Heritage. Historic England responded in length and helpfully raised several issues of importance. One was the broad point about how local heritage assets contribute positively to the quality of life. Another concerned Bow Wharf (Policy HE2), and the difficulty of arguing for development proposals to be informed by a comprehensive development plan. Without such a plan, it would be hard to assess proposals. A local resident raised the lack of reference to conservation areas.

5.1.8 Response. The proposed plan was revised to reference the contribution heritage assets make to the quality of local life. This included the area's 7 conservation areas, The proposed change to Policy HE2 on Bow Wharf, was adopted, with support from the Canal and River Trust.

5.1.9 Affordable Housing. (Policy H1). The issue of the LLDC boundary impacted the plan, as the edge of the proposed housing site behind Wendon St. contained a narrow strip of land, along the edge of the A12, within the LLDC area.

5.1.10 Transport for London (TFL) informed us they were working with Optivo Housing Association to bring forward a site off Paton Close, opposite Bow Church DLR station in the near future. This was another site assessed for housing by AECOM in their site options assessment report for the Forum.

It was suggested by Tower Hamlets Council we should define more clearly what community led housing is.

5.1.11 Response. Regarding the Wendon St. site, a joint planning application by LBTH and Place Ltd. (PA/21/01162) was submitted in June 2021. In view of this, it was agreed to use the site boundary shown in the planning application for the proposed site allocation. We were disappointed that the application was only for temporary, rather than permanent housing.

5.1.12 In view of TFL and Optivo bringing forward soon a scheme for Paton Close, we decided not to consider this site for allocation.

5.1.13 The Forum agreed to define 'community led housing' more closely in the plan.

5.1.14 Community infrastructure. Sport England requested that we consider if the local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy, which could provide useful evidence for the neighbourhood plan.

5.1.15 The Council's Asset Management Team was not in favour of a transfer of assets away from the Council, suggesting instead the renegotiating of leases.

5.1.16 The Council suggested identifying existing open spaces that would be well-suited to additional playspace, given the difficulties of providing significant new open spaces in the neighbourhood area. (Policy CF1)

5.1.17 The Council suggested that if we are proposing the improvement of existing youth facilities rather than re-provision of through the redevelopment of sites, using CIL to fund the improvements, Policy CF2 would be more appropriate as an action point.

5.1.18 The Council also advised that our specific proposal to allocate CIL funding for the maintenance of community centres should be listed as an 'action' rather than a policy (CF3).

5.1.19 Response. The Forum is aware of the LBTH 'Indoor Sports Facilities for the Future' 2017-27 ' document, which includes the note that 'that the Copper Box has significant sports hall capacity and lies just beyond the borough boundary, with transport links and bridge connections set to improve over the life of the strategy and as a consequence improving accessibility and catchment areas.' (p.24).

We believe it is completely unrealistic to expect the great majority of local residents to travel and access this facility, which is seen largely as a venue for elite sporting events.

5.1.20 The Council's Asset Management Team, defended its ownership of community assets vigorously, but we disagree with their position , and believe with due diligence, some of these buildings would be much better developed and maintained under local community ownership.

5.1.21 The Forum considered if we could identify any existing open spaces suitable for new play spaces.

5.1.22 The Forum agreed to change policies CF2 and CF3 into action points.

5.1.23 Other topics. A local resident raised the climate emergency, advocating 'for the Roman Road Bow Neighbourhood Plan to be relevant, now, through to 2031, it needs to address all the complex issues connected to the targeted LBTH goal of reaching Net Zero Carbon.'

5.1.24 Response. We considered how, within the constraints of the plan making process, we could include climate change measures in the plan, and took advice from our consultant. Low carbon homes was already a stated vision for affordable housing in our plan, and a policy was added encouraging significant renovations of residential properties to achieve the Tower Hamlets Local Plan Policy D.ES7 (a zero carbon borough) requirement for new residential developments.

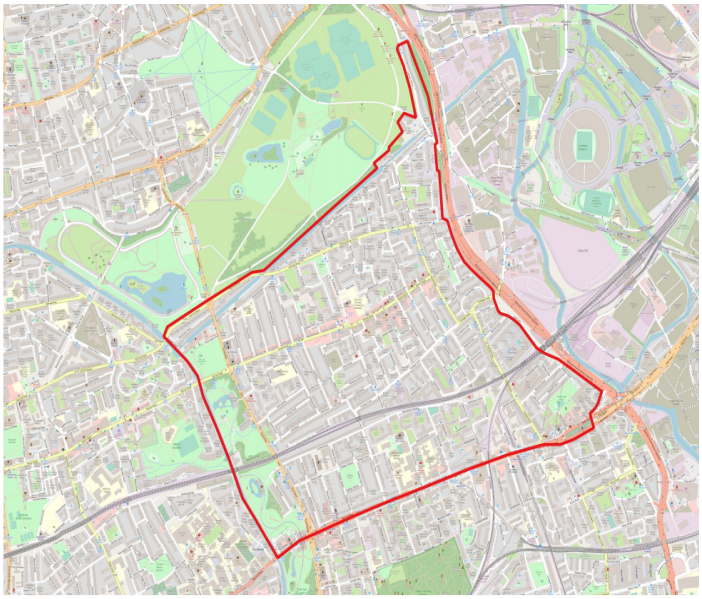
5.2 Consultation over boundary changes to the plan area, 5th July -15th August 2021

5.2.1 Plan Area Boundary. During the Regulation 14 consultation the London Legacy Development Corporation (LLDC) raised the issue that several very small plots of land in the designated plan area bordering the A12 lay within the LLDC planning authority area.

5.2.2 Response. A meeting between the Forum, LLDC and LBTH on 27th April 2021 considered this issue and different options. It was agreed that a solution would be sought involving boundary changes so that only land coming under LBTH present planning regulations would be included in the plan area.

5.2.3 Steven Heywood, LBTH Principal Planning Officer, produced a report and recommendation to this effect, which was approved at a cabinet meeting on 30th June 2021 (Agenda item 6.7, page 177.)

5.2.4 A notice was prepared by the Forum explaining the boundary change and requesting representations over its impact on the draft neighbourhood plan. The notice was uploaded to the Forum website, shared on social media, emailed to all Regulation 14 consultees and those who responded to the original consultation. The Council also published the boundary change on its website. A newsletter was sent out to all Forum members.



Roman Road Bow Amended Neighbourhood Planning Area

5.2.5 The small areas of excluded LLDC land lie between the red, north-south boundary on the eastern side of the plan area, and the thicker orange line of the A12, just to the east of this boundary.

5.2.6 The 2nd Regulation 14 consultation focused on the impact of the boundary change on the draft plan. and was conducted from **5th July -15th August 2021.**

5.3 Regulation 14 representations received over the impact of the boundary change

5.3.1 The London Legacy Development Corporation 'The LLDC supports the proposed changes to exclude the land that falls within the LLDC area from the Plan. We understand that this was an error in the Plan and we support the approach taken to correct the exact position of the boundary. We have no further comments to make on this consultation. LLDC will continue to work with the Forum and LB Tower Hamlets in relation to other cross-boundary matters as they arise.'

5.3.2 The Canal and River Trust emphasised the heritage value of the canals: 'The canals bring a unique heritage value to the areas they pass through, and contribute to a strong identity of place.' They also noted that 'both the Regent's Canal and the Hertford Canal (in part) are proposed as the boundary of the Neighbourhood Plan Area. We advised that we were concerned that this may limit the potential of the waterspace to contribute to the wider benefit of the Neighbourhood Plan, and that the canal will be seen as an 'edge to' rather than an integral part of the area.

5.3.3 Transport for London Commercial Department "TfL CD acknowledge the Roman Road Bow Neighbourhood Forum's revised designation boundary, amended to exclude TfL's landholding at 'Land between Hertford Union Canal and Old Ford Road' (Site 7161 Company Docklands Light Railway Limited) due to this being within the London Legacy Development Corporation.

TfL CD would like to confirm that despite this boundary amendment that we would be open to exploring how this TfL site could be considered as part of any future development of the land to the west which we understand is likely to be included as a site allocation (Wendon Street site) in the Roman Road Bow Neighbourhood Forum. "

5.3.4 Natural England, National Grid and TfL Planning replied, but had no comments to make relating to the impact of the boundary change.

5.3.5 Local residents Two representations were received from local residents. One was from a delivery driver opposed to the Liveable Streets programme, and the other was opposed to the LLDC having planning authority over land to the west of the A12 and the idea of a vehicle bridge connecting Old Ford Road and crown Close. Support was expressed by one of these residents for affordable housing on the site behind Wendon St.

5.4 Forum responses to representations over the boundary changes

5.4.1 The Forum welcomed the support of the LLDC for the action taken by Tower Hamlets Council to amend the plan area to exclude all LLDC land.

5.4.2 The Forum strongly endorses the Canal and River Trust's statement that the canals have unique heritage value and contribute to a strong identity of place. The canals also provide clear borders that help define the Bow area, and the Regent's Canal is a ward boundary. It would have been confusing only to include the part of Victoria Park north of the Hertford Canal and East of Grove Road within the plan area.

5.4.3 The Forum noted that, in future, TfL CD would be open to explore how the excluded part of the site could be considered part of any future development. This is relevant, as in

2024, land in Bow West ward is likely to revert to Tower Hamlets for planning purposes as part of the LLDC exit strategy.

5.4.4 The Forum noted the comments from local residents. Regarding Wendon/Candy Street, LBTH and Place Ltd submitted a planning application for the site (PA/21/01162) in June 2021 for 16 modular units of temporary housing for 10 years.

5.4.5 Concerning the proposal for a bridge over the A12 between Old Ford Road and Crown Close, it was noted that a bus accessible bridge was in the LBTH 2017 infrastructure development plan (estimated cost £32m). There is currently no funding or delivery date.

6. STRATEGIC ENVIRONMENTAL ASSESSMENT

6.1.1 When the Plan was completed for Regulation 14 Consultation, the Forum requested that LBTH undertake a screening assessment on the need for a Strategic Environmental Assessment (SEA). Steven Heywood, principal planning officer at LBTH prepared a draft screening assessment (June 2021) and consulted the appropriate statutory bodies (Environment Agency, Natural England and Historic England). The responses of these three bodies did not give any reason to change the assessment that the draft Neighbourhood Plan was unlikely to have a significant impact on the environment, therefore an SEA was not needed. It was concluded that the Roman Road Bow Neighbourhood Plan will not have any significant effects in relation to the criteria set out in Schedule 1 of the SEA Regulations, and therefore does not need to be subject to a full SEA.

The Final Screening Report Statement of Reasons by LBTH of August 2021 and accompanying Determination Letter of 17th August 2021 is included as part of the supporting evidence base to the Plan.

6.1.2 Following Regulation 14 Consultation, minor amendments were made to the Plan. These included a policy supporting the plan's vision for low carbon homes. The policy is an extension of existing content rather than something new, and only applies to refurbishments. These would be relatively small scale in the overall context of development in Tower Hamlets. There were no material changes to policies such that would change the overall outcome of the screening assessment.

7. HABITATS REGULATIONS ASSESSMENT

7.1.1 At the same time as the SEA screening was requested and subsequently undertaken, the same screening process was carried out on the need for a Habitats Regulations Assessment (HRA). This was undertaken by LBTH who consulted the appropriate statutory body (Natural England). Natural England's response gave no reason to change the assessment that the draft Neighbourhood Plan was unlikely to have a significant impact on European protected species. A determination was then made by LBTH that a Habitats Regulation Assessment (HRA) was not required.

7.1.2 The Final Screening Report Statement of Reasons by LBTH of August 2021 and accompanying Determination Letter of 17th August 2021 are included as part of the supporting evidence base.