



Roman Road Neighbourhood Plan 2021-2031

**Regulation 14 representations received**

15th March - 27th April and 5th July - 15th August 2021

	Dates of Reg.14 consultations:15 March to 27th April 2021 and 5th July to 15th August 2021		
<b>Organisation/ resident</b>		<b>Response by RRB For</b>	<b>Change to NP (if any)</b>
			text in this colour means changes have been added to draft plan
<b>1. High street and local economy</b>	Tower Hamlets requested policies come first in each chapter, followed by actions. Numbers to be consecutive e.g. Policy LE1, Policy LE2, Action LE3, Action LE4		Re-order text, with policies coming first, followed by actions, all with consecutive numbers, so no policies and actions have the same number. Renumber figures, omitting the pre-fix '1'.
Historic England	The document is generally well structured and we are pleased to note the identification of specific heritage objectives. We would agree that traffic congestion and the severance of routes into and from Hackney Wick and the Olympic Park are particular issues which effect the potential economic and social growth for the neighbourhood. Improving the public realm and links over the A12 would help Bow access the developing cultural and educational facilities within the Olympic Park while improving public access to Roman Road and Bow Market with the potential to encourage greater activity around local independent businesses. Opportunities to link creative industries and arts based facilities within the Roman Road area with facilities and activities in Fish Island and beyond would also help to support greater cultural activity.	Comment noted	
GLA Culture and Creative Industries Unit response			

Policy LE1: Encouraging flexible use of premises	Flexible use of existing premises is encouraged, and this supports the aspirations of the Cultural Infrastructure Plan to increase capacity for cultural use without significant capital overheads.	Comment noted	
	London Plan Policy SD6 sets out the importance of variety within a high street setting, including night time and evening activities.	Reference London Plan policy SD6	Reference London Plan policy SD6
	London Plan Policy E3 supports the aspiration to secure affordable workspace at rents maintained below the market rate for social and cultural use.		
	The flexible use of premises on high streets is supported through changes to the Use Class Order which came into effect in September. This provides the opportunity to use spaces for cultural and community use including workspace, supporting the GLA's High Streets for All Mission which aims to work with London's diverse communities to establish new, exciting and experimental uses across London's high streets and public spaces.	Comment noted	
<b>LBTH</b>			
Policy LE1	This is an interesting policy area at the current time, due to something of a contradiction between local and national policy on this issue. The Tower Hamlets Local Plan Policy D.TC2 aims to protect existing retail in town centres by not supporting conversion to other uses in situations where the amount of retail uses in a town centre frontage would fall below a threshold of 60% or 40%, depending on the area. In essence, the policy aims to put some limits on flexibility within town centres in order to try and protect their traditional function as retail centres.	Tension acknowledged between national and local policy	

	<p>However, recent changes to the Use Classes Order have placed a greater emphasis on flexibility in town centres, moving a number of previously separate uses (including retail, professional services, cafes, offices, and some community uses) into a single Class E, meaning that planning permission is no longer needed to switch between these uses.</p>	<p>The Forum welcomes the greater emphasis on flexibility due to the recent changes in the Use Class Order, and believes too much emphasis has been placed on retail as the anchor for high streets.</p>	
	<p>In some respects then, Policy LE1 can be said to be in conformity with national policy (by encouraging greater levels of flexibility) while not being in conformity with local policy. In general, we welcome the neighbourhood forums thoughts on possible responses to the changes in the Use Classes Order and their potential impacts on planning for town centres. However, we feel that significantly more detail is needed in the supporting text and the policy itself to explain what is intended by this policy and how it can be applied in practice.</p>	<p>We will review policy and consider what further details might be added to policy and its intended use. We will also distinguish more clearly between encouraging greater flexibility of existing employment space and the provision of new flexible and affordable space.</p>	

	<p>In particular, the Council's Enterprise Team have noted that while the idea of designing buildings for flexibility of uses seems sensible in theory, in practice it is often hard to achieve as specific occupiers will have specific needs, and these may be quite different between different class E uses – for example, the needs of a retail space are different from those of a café. It may be difficult therefore to design new developments to be inherently flexible between all class E uses.</p>	<p>We need to consider whether to focus on flexible co-working spaces with shared facilities or smaller self-contained spaces such as 25-50 sqm micro-employment spaces</p>	<p>remove reference to 2015 footfall report report on page 35</p>
	<p>The reference to 'communally-shared facilities' is also not clear, and it is not clear whether the policy is aiming to encourage shared workspace or 'hot desking' developments. If this is what the policy aims to encourage, it should be clearer; and at the same time, we would be wary of putting such an aim in policy at the moment, as a number of workspace providers are looking at moving away from the communal hot desking model at this time due to concerns around the coronavirus pandemic. We note the reference in section 4.2.4 to the Roman Road Footfall Report which recommended the provision of hot-desking and co-working spaces, but also note that this is from 2015, and it would be good to understand if the same conditions still prevail six years on.</p>		<p>omit reference to shared facilities in para 4.2.4</p>

	<p>We also note that while some tenants may want “flexible, short term” tenancies, others may want greater levels of certainty – there is a potential that encouraging specific tenancy models may restrict some users while providing flexibility for others. It is difficult but not impossible to control tenancy models through planning conditions, and the Council does achieve this through the requirement in Local Plan Policy D.EMP2 for 10% of employment floorspace on major proposals to be affordable. The draft Leaside Area Action Plan also contains a policy (LS6) that would require employment developments in that part of the borough to provide 10% of employment floorspace as smaller units between 25-50sqm that would be suitable and more affordable for smaller businesses and start-ups, and that these units should be fitted out for such potential occupiers to easily move into. The Leaside AAP is only at Regulation 18 consultation stage at the time of writing, and this policy has therefore not been examined, but we would suggest that something along the lines of D.EMP2 or LS6 could be included in the neighbourhood plan, with a requirement for a certain percentage of space to meet particular requirements related to size or perhaps tenancy requirements.</p>	<p>For <b>new</b> employment space, we will consider shifting the emphasis of the policy to the provision of providing affordable workspace at less than market rates, including smaller units 25-50 sqm and a certain % of flexible tenancies. Use planning obligations to achieve this. - London Plan Policy E3, Local Plan policy D.EMP2, draft Leaside Area Action Plan LS6</p>	<p>Policy LE 1 changed to strongly support proposals to deliver class E uses that are capable of supporting maker spaces, cultural or leisure activities and social enterprises.</p>

	<p>The same Leaside AAP policy also contains a clause requiring new employment developments to provide a Commercial Strategy Statement, which would include an explanation of why a particular design and specification is being proposed, who its intended occupiers are, a marketing strategy to attract those occupiers, and an indicative rent level. The purpose of this is largely to ensure that new employment space in the Leaside area is not left unoccupied, but it could also play a role in identifying that new developments are encouraging a suitable range of employment uses. Again, we stress that this policy is under consultation and has not been formally adopted yet, but something similar to this could play a role in the forum's thinking.</p>	<p>Consider including a requirement for a commercial strategy statement in policy</p>	
	<p>The supporting text could also usefully contain some detail on the specific needs of the social enterprises and creative industries, if these have been identified – what kind of facilities do these industries need that might not be provided in more conventional employment spaces?</p>	<p>Comment noted</p>	

	<p>The policy should also highlight whether it is aimed at a particular geographical location. Presumably, this is intended to apply only in the town centre – if that is the case, the policy should explicitly say this, to remove any suggestion that development proposals for commercial activities might be encouraged elsewhere in the neighbourhood area.</p>	<p>new policy wording adopted - no locations specified</p>	<p><i>In order to support the Bow economy, proposals to deliver class E uses that are capable of supporting maker spaces, cultural or leisure activities and social enterprises will be strongly supported. Such proposals must ensure that they do not have a detrimental impact on the amenity of surrounding occupiers, particularly residential</i></p>
	<p>To conclude, we are not able to support this policy as currently written. The policy needs to be significantly clearer about what it wants to achieve and how to achieve this through planning policy. Some suggestions have been given in the above comments about how the policy might be written to achieve some of the forum's aims, and we would be happy to hold further discussions with the forum following the consultation to help develop this further. It is likely that any policy in this area would need a significant amount of supporting text to explain the nuances of how the policy should work in practice and what will be expected of developers.</p>	<p>Discuss a draft revised policy with LBTH</p>	



	We also have a couple of more general comments on the text around this policy. Section 4.2.1 identifies some potential causes of the number of vacant business premises on Roman Road, but doesn't provide any evidence that these are indeed the causes. In section 4.1 where percentages of vacant units are used, it would be useful to also know the absolute numbers of vacant units.	Market area 12/120 vacant St. Stephens - Grove Rd 19/101 vacant	Include numbers of vacant units
	The key to figure 1.14 says 'proposed town centres' although this shows the designated town centre for Roman Road East – this is presumably because the map has been taken from a Tower Hamlets evidence base document from before the new Local Plan was adopted.	We will replace figure 1.14 with a more recent map.	draft policy page 35. replace figure 1.14 with map on p.56 of <a href="#">Tower Hamlets High Streets &amp; Town Centres Strategy 2017 - 2022</a>
Action LE1	We are generally supportive of this proposal. However, we would be interested to know whether the forum has been in communication with the owner of this site, and their opinion on the proposal – as the agreement of the owner will obviously be key to implementing any changes. We appreciate that this is listed as an 'action', and therefore represents a community preference rather than a strict planning policy, but it is likely that an inspector of the neighbourhood plan will also want to know what engagement has taken place with the owner of the site. If the owner was in agreement with the proposal, then there is no reason why this could not become a formal site allocation, with some additional detail added around what is expected from the site.	Follow up with owners of Bow Business Centre (Mike phoned and sent email on 13/05/2021)	
Action LE2	We are supportive of this proposal. The Council's Enterprise Team has noted that there are existing programmes (WorkPath, Young WorkPath, and Tower Hamlets Education Business Partnership) that can support this objective, and these could be referenced in the supportive text.	Comment noted	include a reference to the different programmes
Action LE3	We are supportive of this proposal, and have no further comments on it at this time.	Comment noted	

Local resident	Roman Road is ugly, even many of the units with businesses have shopfronts signs that are shabby, missing altogether or badly maintained. We need to enforce a responsibility of business owners to maintain their shopfronts. To help with this maybe loans and grants should be made available to facilitate this?	Comment noted	
	To encourage the night time economy during the summer months maybe the eastern section of Roman Road could be closed to traffic with restaurants cafes and bars able to put outside tables and chairs on the street. If it doesn't exist already a local business association should be set up up for businesses on Roman Road enabling the set up of a Business Improvement District in a similar way to InStreatham say <a href="https://www.instreatham.com/">https://www.instreatham.com/</a> In any plans for Roman Road we should make sure that accessibility for disabled residents is considered and prioritised.	Liveable Streets programme will make market area pedestrian-only during daytime.	
Local resident	I personally find Bow House Business Centre ugly and uninviting I feel for it to be a reasonable solution to the objectives in the report substantial investment would be need to clean and renovate the property. Perhaps other alternative sites should be considered.	Comment noted	
	I have lived on Lichfield Rd now for over 27 years and not much has changed. The market and immediate Roman Rd area really needs to be addressed and there are a lot of people who feel that this area isn't being utilised properly.	Comment noted	

Local resident	Two ideas here: the empty retail spaces should be used as pop up shops to increase interest and drive footfall to the area. There are too many real estate agents and nail bars (who only take cash. Is that legal?). This however isn't as simple as it should be, as I have tried myself. There is resistance from the council and local estate agents marketing these sites. I have been told several times by the agents at Look that several properties I enquired about were now 'taken'. This was about a year ago and they are still empty. There is also a shop opposite Bonner Square that has been empty for years and is supposedly for rent by the council. When we enquired, the person at the council was very evasive and said it wasn't for rent anymore. It has since been witnessed that someone is using the locked up premises to store goods. Meanwhile, it continues to be an eyesore.	Evidence noted of challenges experienced by local people who try to find meanwhile use for empty retail units	
	My second plan is to open up Roman Rd market on a Sunday to sell vintage, food, books, etc. A bit like Broadway market or how Spitalfields market used to be. This would really support small business owners and artisans, plus offers a variety we currently don't have. The local school could be approached to hire out their playground and parking space as a parking site. This would be a great way of encouraging a larger sector of people to the area, provide business to the current street vendors, plus support expansion and create interest for new shop holders.	Noted and informed resident about Roman Road Trust	
Localresident	Exciting to see the Draft Neighbourhood Plan. I see lots of great initiatives, ranging from plans to bolster the Roman Road shopping infrastructure, to developing better cycle routes.	Comment noted	
Local resident	I applaud the commitment to flexible use of retail space on Roman Road, and urge you to go further if possible.	support for flexible use of retail use noted	

Local resident	Rejuvenating the market. It strikes me that a concerted effort is need to relaunch the market. Can we attract a greater diversity of stalls? Can we tidy up the look of the current stalls? Could more food/drink provision be brought in? How can we/the council support this? Better market = more visitors = more customs for shops = more shops open too.	support for rejuvenating the market noted	
Local resident	Empty units. 100% agree on all steps to get them back into use. But while note in use, what can be done to tidy them up. Colourful posters by local students? Use for art projects? Some creative thinking here could lead to cheap, effective action to cheer these up!	support for meanwhile use of empty units noted	
Local resident	4.2 does discuss implementing flexible use class. However it should go further or make a bigger point to allow for more cafes and restaurants onto roman road. I believe there is a restriction at planning level, about the % of retail vs cafes/restaurants, and this % should shift based on changing demands of Londoners. Most high streets in the city have changed this skew, but roman road seems to have been left behind, leading to the many empty retail units and high volumes of nail salons and declining importance of the street as a hub.	plea for shifting balance away from, retail towards other uses, including cafes and restaurants on the Roman	
Local resident	Objective 1: Thriving High Street and Local Economy		
	Night Time Economy: We advise caution on any plans to develop a night time economy as we remember the problems caused to local residents, and the police, with Weatherspoons and Bar Risa which both had to be closed. We also experienced the nighttime economy develop in Shoreditch in the 1990s, and the disbenefits to local residents who did not get jobs but had visitors pissing in their doorways. Restaurants have been developing at about the right pace of change but the impact on shop rents will be detrimental if a night time economy develops. We fully supporting measures proposed to preserve local pubs.	Noted that development of night-time economy will need to mitigate risks of anti-social behaviour	

Local resident	4.2 does discuss implementing flexible use class. However it should go further or make a bigger point to allow for more cafes and restaurants onto roman road. I believe there is a restriction at planning level, about the % of retail vs cafes/restaurants, and this % should shift based on changing demands of Londoners. Most high streets in the city have changed this skew, but roman road seems to have been left behind, leading to the many empty retail units and high volumes of nail salons and declining importance of the street as a hub.	Noted, - comment supports the shift away from reliance on retail as main anchor for Roman Road.	
Local resident	The Market/Shopping: We don't agree that there is not a variety of shops in the Roman Road. There is nothing we can't buy except perhaps a car and a holiday. We share concerns about the number of estate agents and betting shops.	Comment noted	
same local resident	The Plan says disparagingly of the market 'while popular with some residents'. We include ourselves in 'some resident'. The market is popular with those who want and, in many cases. need a market which suits their pocket. We know it is not popular with those who want handmade soaps, scented candles and endless coffee shops. It is insulting to hear the market described as 'messy' – we do not want a sterile space appealing to people who are already amply provided for in Lauriston Road and Broadway Market. The Plan should praise, instead of criticise, how remarkable it is for a local London market to run three days a week. Changes to the streetscape run the risk of gentrifying a traditional gem unless very thoughtfully planned and engaging the traders. Furthermore, while there are closed shops, there is also a turnover allowing businesses access to affordable rent retail outlets to try different things and start-up businesses.	Noted that a local market selling competitively priced goods is needed by many people.	

	<p>The Plan to remove the car park from the market is a stab in the back for a market that is and could be promoted as a Tower Hamlets wide and regional resource. Furthermore, the car park is an ideal location to put in increasingly vital electric charging points.</p>	<p>Raises very relevant issue of provision of electrical charging points for cars. The Forum subsequently explored this issue and drafted a policy for it, but were advised against introducing a completely new policy area after the Regulation 14 consultation. This could possibly trigger the need for a Strategic Environmental Assessment.</p>	
<p>same local resident</p>	<p>Light Industry: Support for local training/apprenticeships and work placements is great. Need more workplaces to back this up. It isn't clear where the shared workspace is going to be and whether this is a bid to change the use of shops. This would need to be kept in check. We don't know what the E classification is but hope the Plan will enable workshops which make tangible things rather than just desk space.</p> <p>Manufacturing should be welcomed back to the area and facilitated to provide much needed jobs. This means spaces to be planned in/designated now.</p>	<p>Comment noted</p>	
<p><b>2. Green streets</b></p>			
<p>LBTH</p>			

Policy GS1	The aims of this policy are very strongly supported, and are in line with a number of strategies prepared by the Council in recent years around the need to improve connectivity in the borough, particularly for those walking and cycling, and for disabled people. As mentioned in the general comments, we think there is an opportunity for the supporting text to set out more detail of how the policy might be applied. In particular, the policy needs to be clearer about how developer contributions are expected to be used to deliver these improvements, as noted above in the section of general comments. In some cases, this will be possible through direct developer S106 or S278 contributions; but for wider changes to the area, these may be more appropriate as priority suggestions for CIL.	Comment noted	
	We have a number of other suggestions to strengthen the policy further, which are set out below:		Reformat as 1. a,b,c, d etc
	<ul style="list-style-type: none"> <li>• Clause 1 – as mentioned in the general comments, it would be good to specify (perhaps in supporting text) what kind of contributions are envisaged here, and to keep in mind the limitations of the neighbourhood plan with regard to CIL (i.e. that they can set out community priorities for the use of CIL, but cannot mandate where CIL is spent).</li> </ul>	Comment noted	Policy GS1 suggested as a priority for CIL funding at end of draft plan
	<ul style="list-style-type: none"> <li>• Clause 2 – are the five roads here intended to be the main priority routes for improvements to cycle lanes? If so, this should be said more explicitly. While the choice of roads appears sound, it would also be good to provide an explanation for why these roads were prioritised.</li> </ul>	Comment noted	
	<ul style="list-style-type: none"> <li>• Clause 3 – this could perhaps say “within <b>and across</b> the development site” to help emphasise the need for sites to enable connections to existing routes.</li> </ul>	Comment noted	change to 'within and across'
	<ul style="list-style-type: none"> <li>• Clause 4 – presumably this refers to “new <b>public</b> bicycle stands”.</li> </ul>	Comment noted	change to 'new public cycle stands'

	<ul style="list-style-type: none"> <li>• Clause 5 – a link could be made here to the parking standards in the Tower Hamlets Local Plan, which set out what an appropriate level of bicycle storage is in different kinds of development. The supporting text could also reference the bike storage guidelines (design principle 8) from the emerging Central Area Good Growth SPD. Additionally, as these standards already exist in policy and guidance, this clause might not be necessary.</li> </ul>	Comment noted	Policy D.TR3 mentioned and Central Area SPD
	<ul style="list-style-type: none"> <li>• Clause 6 – this would benefit from supporting text setting out what an ‘appropriate width’ is, or how this could be assessed when an application comes forward. It may also be possible to specify that this might require frontages of developments to be set back from the plot edge where existing pavement widths are inappropriate.</li> </ul>	Comment noted	a minimum of 2 metres wide to allow 2 wheelchair users to pass.. (have changed this to 1.5m minimum in line with Transport for all guidance
	<ul style="list-style-type: none"> <li>• Clause 7 – this clause could be more ambitious by removing the words “where needed” – this would set an expectation that pedestrian facilities such as seating and signage should be provided as the default. The clause, or supporting text, could perhaps specify that this is especially important on green grid routes in the area.</li> </ul>	Comment noted	delete 'where needed'
	<ul style="list-style-type: none"> <li>• Clause 8 – would it be possible in the supporting text to identify some locations where safer crossings may be needed? Or alternatively, to state that this will be assessed on a site-by site basis.</li> </ul>	Comment noted	replace 'where needed' with 'on a site-by-site basis, especially near busy junctions such as Tredegar Road and the A12.'
	<ul style="list-style-type: none"> <li>• Clause 9 – as opposed to clause 7, this clause may actually benefit from the addition of “where needed”, as the provision of new bus facilities will obviously be a much rarer need than for seating or signage.</li> </ul>	Comment noted	add 'where needed'



	<ul style="list-style-type: none"> <li>• Accessibility clause – the reference to removing street clutter could do with some supporting text to set out what kinds of street clutter are most problematic in the area, and perhaps to consider how this can best be trimmed down. Again, it would be useful to understand if the two roads mentioned are priority routes for accessibility interventions, and why they were chosen – the use of ‘including’ at the moment perhaps suggests there are other, equally important routes that are not being mentioned. In terms of formatting, it would be useful if this clause could be numbered – the first set of clauses could perhaps become 1a/b/c, etc, with the accessibility clause and blue badge parking clause becoming clauses 2 and 3.</li> </ul>	Comment noted	<p>'street clutter, such as the night sky podiums in Gladstone Place, and pedestrian signs which can be easily turned around and some inappropriately sited cycle stands in market area.'</p> <p>reformat:</p> <ol style="list-style-type: none"> <li>2. Increasing accessibility</li> <li>3. Blue badge parking.</li> </ol> <p>Have added some supporting text in the chapter</p>
	<p>Figure 1.16 does not seem to include the two accessible routes mentioned in the policy – St Stephen’s Road and Grove Road (Grove Road is included, but only indicated for cycle improvements on the map). The map shows three circles indicating improved access to the Olympic Park. This objective is supported, but two circles are on the boundary with the LLDC and the other is entirely within the LLDC (and on the boundary of what would otherwise be Tower Hamlets and Newham), so supporting text should be added to the policy to indicate that these improvements will require joint working between Tower Hamlets, Newham, and the LLDC.</p>	Comment noted	<p>Add to the Fig 1.1.6 heading, 'Improved access to Olympic Park will require joint working between LBTH, Newham and LLDC'.</p>

Action GS1	<p>We believe that with some small tweaks, this 'action' could be presented as a policy (or combined with the existing Policy GS1). Clause 1 appears to be very similar to the clauses included in Policy GS1 – if kept in its current form, the reference to the evidence base for the Action should be placed in the supporting text. Clause 2 could be slightly reworded to say that applications for such school streets will be supported. Clause 3 appears to repeat the final sentence of Policy GS1 in more detail, and could be reworded to say something to the effect that loss of parking or changes to the highway that remove taxi access will not be supported. In clause 4, a policy could not mandate Tower Hamlets and TfL to work together (though we of course do this anyway when relevant), but could say that proposals to make the station step free are strongly encouraged, with supporting text noting the need for joint working.</p>	Comment noted	<p>Suggested wording changes accepted. Decision made to keep as an action (GS2) in updated plan.</p>
	<p>The Council's Transport team have asked if the reference to a 'segregated' cycle lane on Grove Road be changed to say 'high-quality', on the basis that a segregated track may not be feasible on Grove Road, but that other options can be explored to achieve an inclusive cycling facility. They have also asked if the reference to blue badge parking on Roman Road be changed to say 'in the Roman Road area', as options are being explored for how access to facilities on Roman Road can be maintained at times when the road itself is pedestrianised. They have also asked if the reference to a 'proper cycle network' in the objective itself can be changed to 'high-quality', as this language is more easily definable in terms of transport planning.</p>	Comment noted	<p>1. High quality cycle route along Grove Road should.... 2. Proposals for School Streets for all schools in the area will be supported 3. ...parking provision in the Roman Road area.... 4. 'proper' replaced by high quality in the wording of the objective</p>
Local resident	<p>On page 21 of your draft plan document, under 5.2.2 Policy, in points 1,2,4 and 5 you refer to 'bicycle', this should be changed to 'cycle' as it is deemed more inclusive as it covers non-standard cycles such as tricycles, handcycles and cargo bikes etc.</p>	Comment noted	<p>Change all references to 'bicycle' to 'cycle'</p>

	Request for non-standard cycle stands along Roman Road and cargo bike cycle stand outside Tesco in Gladstone Place.	Comment noted	Have added text
Local resident	I strongly support the proposal for a pedestrian cross at the Tredegar Road/A12 junction. I have raised this on numerous consultations over the years and still nothing has been done about this, something that could be easily fixed. In particular it was yet again ignored in the Liveable Street proposals.	Comment noted	
Local resident	Walking: We are frustrated by cyclists and pedestrians classified together. They often have conflicting interests e.g. cycle lanes behind bus stops. on park paths, the use of pavements and zebra crossings. Canal towpaths have become a no-go area for many pedestrians, including people who have used and valued the towpaths all their lives who say they do not go there now because of the aggressive cyclists who see it as their personal cycling path. When the towpaths were officially opened to the public in the 1970s, signs at entry points stated: 'Please do not cycle in this park', British Waterways stated that the towpath was not suitable for cyclists and that 'cycling would conflict with the interests of existing users' i.e., pedestrians. Now that there is an extensive cycle paths network developing, the Plan should press for the Canal and River Trust to ban and prevent cycling on the towpath, so they can again be used without constant interruption and for quiet contemplation and nature rambles by pedestrians. There is also an issue about diesel pollution from canal boats. This should be discussed with CRT	Comment noted	
	Electric scooters etc: The Plan makes no mention of electric scooters/bikes/ skateboards etc which are on the increase and can go extremely fast in public spaces. This will grow as a national issue, but the time is now to consider the pros and cons and adapt the infrastructure accordingly.	Noted, but electric scooters are a much wider issue , and not one for a neighbourhood plan	

	<p>Electric charging: More and more vehicles are and will be electric during the period of this Plan. Already, we see electric charging wires across pavements from peoples' homes which are a hazard, particularly to people with poor eyesight. There's also hydrogen emerging as a greener fuel. The plan seems to only recognise vehicles as pollutants and not as essential for many people and purposes. The plan should identify places for electric chargers and consider access to hydrogen outlets, if this takes off.</p>	<p>The issue of electric charging points was considered, and the Council are introducing 182 charging points across the borough (see above) - GS1 point 6)</p>	
	<p>Street Clutter: The reduction of street clutter is very welcome but seems to be contradicted by 'well signed footpaths'. It is certainly contradicted in practice in recent months where Riney vans keep arriving with a new sign. As pedestrians, we don't need signs in our local area to tell us our routes. There are many factors affecting routes, such as crime. There are certain (and increasing number of) streets we avoid especially at night, which no sign will pick up.</p>	<p>Comment noted</p>	
	<p>Community Safety: Crime is a problem across Bow. The plans re streets and open spaces do not pay enough attention to what happens after dark, and community safety. Some schemes seem to design in crime rather than designing it out. The Plan is too light on safety. This also applies to Objective 3.</p>		
	<p>Mile End Station: Step free access at Mile End would be wonderful.</p>		
<b>3. Beautiful public spaces</b>			
Environment Agency	<p>We aim to reduce flood risk, while protecting and enhancing the water environment and together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at:</p>	<p>Comment noted</p>	

	<p><a href="http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf">http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf</a></p> <p>This information includes: You could identify opportunities for new green spaces or improvements to public space through new development. This could include linking open spaces to make 'green corridors' for people and wildlife, planting trees, or making improvements to local waterways. You could also encourage good design to ensure that new development reflects and complements the character of the area.</p>	Comment noted	
LBTH			
Policy PS1	<p>This policy is supported, and we have no additional comments to make on the policy itself. Again, the supporting text could include a 'how this policy works' section to set out slightly more detail around what might be acceptable on these sites. This would assist planning officers in assessing applications. It could also be specified in the supporting text that these are community priorities for the use of CIL. Figure 1.21 appears to have some inaccuracies – there are 11 spaces listed in the policy; 10 spaces listed in the key to the map; and while there are 10 sites shown on the map, two of them are numbered 9.</p>	<p>Consider adding a 'how this policy works' section and mention that this is a priority for CIL funding.</p>	<p>A list of priorities for CIL funding was added at end of plan.</p>
Policy PS2	<p>The supporting text sets out the context around the designation of Local Green Spaces well. It's not clear what level of engagement there has been with the owners of the green spaces in question – while it is not necessarily a requirement for the owners to agree with a Local Green Space designation, an examiner will likely want to know that engagement has taken place. This may be taking place as part of the Regulation 14 consultation, but if you haven't explicitly sought the opinion of the site owners as part of the process up to now, you should aim to do so before submission of the final plan.</p>	<p>The local events in our engagement report includes comments in support for preserving valued green spaces. LBTH is the owner of some of the green spaces proposed for designation.</p>	

	<p>In terms of the sites proposed as Local Green Spaces, all of the sites clearly meet the criteria of being in close proximity to the community and local in nature. The requirement for Local Green Spaces to be 'demonstrably special' is obviously a matter of judgement, but the accompanying evidence base document provides a brief explanation of why each site is considered special. We have concerns that some of the sites, particularly those which are essentially amenity open space on housing estates, do not meet the requirement in NPPF paragraph 100(b) that sites should be "demonstrably special" and "hold a particular local significance". In many instances it is unclear how these sites, while undoubtedly valued by the people who use them, can be shown to have particular local significance that should elevate them to the very high level of protection provided by the Local Green Space designation, which is equivalent to that of the <a href="#">green belt or Metropolitan Open Land</a>.</p>	<p>The amenity open spaces on housing estates are 'demonstrably special' and 'hold a particular local significance' because they are precious local green spaces amid dense housing. They need protection to ensure they are not lost through infill development.</p>	

	<p>We note that policy D.OWS3 in the Local Plan provides significant protection to open spaces in the borough (and not just those that are classed as 'publicly accessible' and therefore shown on the Local Plan policies map), but also provides some level of flexibility. Specifically, it states that development on areas of open space will only be supported where an increase in the quantity and quality of open space is provided as part of a wider development proposal, and it can be demonstrated that there will be no adverse impacts on ecological, heritage, or recreational value of the open space or the flood risk on the site. This provides for the possibility of improved, larger open spaces being delivered as part of redevelopment proposals, which would potentially be cut off if parts of the site are designated as Local Green Space and protected to the same extent as the green belt. In the event that proposals for redevelopment come forward on these housing estates in the future, the new development could be forced to essentially 'build around' existing open spaces that cannot be touched because of the Local Green Space designation. This could affect the ability of proposals to deliver greater levels of open space and potentially affect the ability to deliver wider urban design improvements where the layout of estates cannot be significantly altered due to protected green space.</p>	<p>Given the lack of local sites for development, we cannot conceive a way in which the 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.</p>	
	<p>However, if the owners of the proposed Local Green Spaces have been consulted and are supportive of their sites being designated, we would likely defer to their preference.</p>	<p>Comment noted</p>	
	<p>Despite these comments, we do think that some of the spaces proposed could meet the test of being demonstrably special and locally significant to justify designation as Local Green Spaces. Our comments on each site are provided below:</p>	<p>This counters the points made above.</p>	

	<ul style="list-style-type: none"> <li>• Daling Way – as an area of amenity green space attached to a housing estate, we would not say that this site has enough significance to justify the designation.</li> </ul>	<p>We disagree, as this is a precious green open space on the dense Ranwell Estate. The Lord Morpeth pub, with its suffragette mural facing the green space, is an important part of our local heritage.</p>	
	<ul style="list-style-type: none"> <li>• Holy Trinity Churchyard – given the listed status of the church and the clear historical interest, we support this site being designated as Local Green Space.</li> </ul>		
	<ul style="list-style-type: none"> <li>• Lockton Green - as a small area of play space within a housing estate, we would not say that this site has enough significance to justify the designation.</li> </ul>	<p>This space is on a dense, high-rise estate, and is much loved and used by local residents. It is significant as a play and social gathering point.</p>	



	<ul style="list-style-type: none"> <li>• Matilda Gardens - as an area of amenity green space attached to a housing estate, we would not say that this site has enough significance to justify the designation.</li> </ul>	<p>The gardens are one of very few green spaces in an area of Bow which has seen a lot of recent development. It provides much needed outdoor play space for children. The gardens with their trees, grassed area and sculpture add significantly to the quality of the local environment.</p>	
	<ul style="list-style-type: none"> <li>• Trellis Square – given the scarcity of urban food growing opportunities in Tower Hamlets and beyond, it could be said that this site holds particular recreational value and health benefits, and we support the site being designated as Local Green Space.</li> </ul>	<p>This site only differs from others in being used for food growing, but otherwise is a similar small open space valued by local residents.</p>	

	<ul style="list-style-type: none"> <li>• Brodick House - as an area of amenity green space attached to a housing estate, we would not say that this site has enough significance to justify the designation.</li> </ul>	<p>This amenity green space is the only green space easily accessible to the residents of the 130 flats in 22 storey Brodick House and neighbouring flats. It is very significant to local residents, and needs protecting.</p>	
	<ul style="list-style-type: none"> <li>• Roman Road Adventure Playground – given the benefits of this site as children’s playspace, and particularly its role as an adventure playground providing larger pieces of play equipment, we support this site being designated as Local Green Space.</li> </ul>	<p>Comment noted</p>	

	<ul style="list-style-type: none"> <li>• Wennington Green – this site is already designated in the Local Plan as publicly accessible open space, a Site of Importance for Nature Conservation, and, partially, Metropolitan Open Land. We suggest that therefore there is no need for a further designation on this site, and an examiner of the neighbourhood plan would likely want to understand what a Local Green Space designation would bring to a site that is already well-protected by policy.</li> </ul>	<p><u>SINCs are non-statutory, and Victoria Park is the Metropolitan Open Land</u> - not Wennington Green (p.17 chapter 6, Maps, Open Space Strategy 2017 Appendixes). We cannot see clear evidence of the Green being well protected. See evidence at the end of this section from a local resident regarding the value of Wennington Green.</p>	
	<ul style="list-style-type: none"> <li>• Wick Lane – as mentioned earlier as part of the boundary issue, the land to the east of Wick Lane is actually located in the LLDC. The neighbourhood plan therefore cannot designate this land as Local Green Space without the neighbourhood area and forum first being approved by the LLDC.</li> </ul>	<p>As the site is located in the LLDC area, it cannot be designaed at this time. In 2024 the LLDC will return planning authority back to LBTH, and so the site couldbe designated in future.</p>	<p>Revoive this site from the draft plan (No. 23 in figure 1.22)</p>

	<p>On figure 1.22 the heading to the key describes the content of the map as 'Local Green Spaces'. This should be altered – in the context of Policy PS2, the term 'Local Green Spaces' has a very specific meaning related to a particular designation set out in the NPPF. The existing protected green spaces shown on the map are not Local Green Spaces in this sense of the term, but fall under other designations such as publicly accessible open space and Metropolitan Open Land.</p>	<p>We need to rename figure 1.22</p>	<p>Rename figure 1.22 'Publicly accessible open spaces'</p>
Local resident	<p>I think there is a case for being more radical on the use and management of green and community spaces. I recently moved from Shoreditch where I was Chair of the Friends of Arnold Circus, a charity with an SLA to manage the green space in the middle of the Boundary Estate. Could we do more in Roman Road to transition the management and upkeep of green spaces away from the Council to community groups and charities? It would build social capital, put the community in charge and likely lead to much better use of our green spaces.</p>	<p>Suggestion noted for opportunities for a more radical use and management of green and community spaces, including their local community management and upkeep. Trellis Square allotments is one potential example.</p>	
Local resident	<p>Policy PS1 suggests specific open space creation/improvement. These seem to have the support of the residents affected and will be welcome. However, there is at least one measure being considered by the council which was not put forward during the Plan's development: the pocket park/closure of Chisenhale Road which has been changed from a temporary Covid 19 emergency measure to an 'experiment'. The Plan should make it clear that such developments must be justified and supported by the majority of those directly affected.</p>	<p>The Chsenhale changes are part of Scheme 7 of the TFL funded Liveable Streets programme, which were consulted over and supported by a substantial majority of respondents.</p>	

	Furthermore, the impact of Liveable Streets will be significant. Until this has settled down and both intended and unintended consequences become clear, the promotion of further pocket parks beyond those in the Plan should be resisted.		
	Same comment as above about the use of bikes and electric vehicles in our parks. They are dangerous and too many ignore the 'slow' signs for cyclists. Better measures are needed to address the problem.	This is a valid park management issue, but not a planning one	
Local resident	Policy 5.1.1 Protecting Existing Green Spaces. This is wonderful and I hope will be in place before QMUL attempts to build an 8-10 storey line of buildings opposite Mile End Park.	Support for protecting green spaces noted	
	Wennington Green/ Mile End Park. In my role as the Chair of the Friends of Mile End Park, I am disappointed that FOMEPP was not approached about the proposal to "revitalise Wennington Green"		

	<p>The RRBNP documents interchangeably describe Wennington Green as part of Mile End Park and at others as "adjacent" to the park. For clarity, Wennington Green is part of Mile End Park. A recent survey (unpublished data) conducted by the Friends of Mile End Park with over 400 responses has shown that an aspect of the park that is really appreciated is that it is divided into "zones". Wennington Green with its small play park and its "adidas" zone (which has just been substantially redeveloped with disabled access) is very useful as it is for holding events including Fun Fairs and concerts. It is also used as an outdoor exercise space by a number of personal trainers (Zumba etc). The comparison between Wennington Green and Potters Fields which is opposite a World Heritage Site and on the Thames is an interesting one. It would be wonderful if planting schemes could be added without losing the general recreational functionality. Is the use of unflattering photos of Wennington Green alongside wholesome computer-generated ones for Potters Fields really a path we want to go down?</p>	<p>The survey by Friends of Mile End Park highlights the special place Wennington Green in local community life, for children (small play park), young people and adults, including people with disabilities (Adidas exercise zone and outdoor exercise classes such as Zumba), and for wider community events such as Fun Fairs. This strengthens the case for keeping Wennington Green in the plan a a designated local green space, especially given the proximity to the heritage assets of Bow Wharf and Regent's Canal.</p>	<p>Correct the name to the 'Art Pavilion' (Fig.13)</p>
	<p>Please note the incorrect caption "Ecology Pavillion" when the building is indeed the "Art Pavilion" (with one "l")</p>		
	<p>That Mile End Park including Wennington Green is underused is very much debatable. I think COVID has put change to that (again the FOMEF user survey indicates this).</p>		
<p><b>4. Heritage</b></p>			

<p>Historic England (see document folder)</p>	<p>Our Historic Environment Advice Note 11 on Neighbourhood Planning sets out detailed advice and approaches to identifying heritage assets and the contribution made by the historic environment to local character. This includes considering the contribution, condition and identifying opportunities for heritage assets and writing policies to secure positive change to support sustainable growth. The neighbourhood area includes a number of designated and undesignated heritage assets and a number of conservation areas whose character and appearance contribute positively to the quality of life and which can often be enhanced to generate greater benefits. The draft plan has positively sought to address these issues in respect to public houses. However, we would consider there is opportunity to consider the wider contribution to local character made by the historic environment. This could for example, include the setting of and social contribution of key cultural buildings and churches, and the condition and appearance of the high street. Such work could help inform the Heritage Trail and also identify specific policies or objectives to ensure proposed development responds and enhances the character of the area. Advice Note HEAN 11 gives advice on undertaking this work and also on effective policy writing to achieve these aims).</p>	<p>Consider highlighting in text how local heritage assets, including conservaion areas, contribute positively to the quality of life., e.g. setting of and social contribution of key cultural buildings and churches, and the condition and appearance of the high street.</p>	<p>There are 7 conservation areas in the plan area: Clinton Road, Driffield Road, Fairfield Road, Medway, Roman Road Market, Tredegar Squire, Victoria Park ( includes Cadogan Terrace). Each one has an adopted character appraisal and management guidelines document.</p>
	<p>We would also recommend that the heritage significance of the public houses identified is clearly set out. As NPPF Policies for locally listed assets require proposals to be considered against their significance ,ensuring that this is clearly identified will help to ensure that the contribution they make is preserved.</p>	<p>Review heritage significance of public houses</p>	

	<p>In respect of Policy HE2 7.5.2 Bow Wharf Waterway infrastructure conservation and enhancement. This could benefit from minor editing to strengthen the policy. Specifically the aspiration for the production of a comprehensive heritage plan could be identified as a separate objective and consideration given to how this can be developed and delivered. Our concern is that as a requirement in Policy HE2 developers are unable to produce plans which reflect this until this is heritage plan is published. By making these requirements separate objectives there can be an aspiration to produce this and a separate policy to ensure development demonstrates how proposals respond to the special character of the area. We would therefore suggest the following revision.</p>	<p>Review policy HE2</p>	
	<p><b>Development proposals at Bow Wharf must demonstrate how they reflect the historic character of the area and how they will enhance both its heritage significance and cultural vibrancy. Proposed development must therefore submit a comprehensive statement of historic significance clearly demonstrating how proposals positively reflect and are informed by the existing historic context and how the proposals will enhance the historic character of the area. Developers are advised to ensure plans are developed in consultation with the Council’s conservation team, neighbourhood forum and the Canal and River Trust. Proposals must demonstrate widespread consultation with local businesses, residents and community groups.</b></p>	<p>Review policy and consider the new suggested wording. Emailed proposed new wording to Canal &amp; River Trust 13/05/2021, asking for their view. See below for Canal &amp; River Trust support for new policy wording.</p>	<p>New policy wording from Historic England to replace existing wording.</p>
	<p><b>Development proposals must provide for an appropriate mix of uses that include leisure and recreational activities and affordable workspaces for small businesses. Recreational provision that improves connectivity with the Green Grid and better links Victoria and Mile End parks and/or Hackney Village with the Roman Road, will be strongly supported.</b></p>		



	<p>As a general observation we note that the Draft Plan sets out at length the relevant Local Plan and national policies relevant to the proposals. We would consider there is potential to reduce this element within the document in order to allow greater space for neighbourhood analysis, themes and evidence. In respect of the heritage policies it would be advantageous to better define the heritage context for the policies including the location of key assets. Where conservation area appraisals exist it would be useful to consider whether these are up to date, how well these define local character and whether there are key issues arising which can be highlighted in the neighbourhood plan. HEAN 11 gives further advice in undertaking this type of analysis</p>	<p>Consider reducing length of local and national plan references, and giving more emphasis to the heritage context and location of key heritage assets</p>	
	<p><b>Archaeology: The Neighbourhood Plan area encompasses areas of archaeological interest (Archaeological Priority Areas). An analysis of TowerHamlets APA's was undertaken in 2017 and is available here <a href="https://historicengland.org.uk/content/docs/planning/apa-tower-hamlets-pdf/">https://historicengland.org.uk/content/docs/planning/apa-tower-hamlets-pdf/</a>. This highlights the potential for "Tier 2" medieval and post medieval archaeological remains. While being a consideration in respect of development the archaeology of the area is a valuable resource for heritage and cultural themes which can potentially feed into public realm works, cultural events and initiatives such as the heritage trail. You may in this respect wish to consider how new evidence arising from development within the plan area can help inform understanding and activity.</b></p>	<p>Consider mention of APAs as a potential source of themes to feed into public realm works, cultural events and heritage trail.</p>	<p>Heritage as as a potential source of themes for current activities included in plan</p>

<p><b>Canal &amp; River Trust (Heritage and Environment)</b></p>	<p>The Canal &amp; River Trust Heritage specialist agrees with the comments made by Historic England in respect of the rewording of the draft policy for Bow Wharf. In addition, the Trust would make the following, site-specific, comments:</p> <p>The Stop Lock has an important role to play in enabling an appreciation of the history of the HU Canal, and particular issues around water supply. The visibility of the lock chamber from the Stop Lock Bridge gives much opportunity for interpretation and appreciation of the lock itself, albeit disused.</p> <p>Restoration of the Stop Lock, including at least one pair of its gates, would enable its historic function and heritage significance to be better understood.</p> <p>The site would benefit from interpretation panels explaining the rich heritage of this waterway.</p> <p>Development should look to retain, where possible, important waterway operational facilities, including workboat and berths.</p> <p>Bow Wharf is the only site in East London with secure operational berths, with relatively easy access, storage facilities (albeit it under a bridge) and parking. There is an operational need to protect these facilities, and ideally develop them due to the proximity to some of our busiest waterways.</p> <p>Maintenance of the waterway wall is required on an ongoing basis</p> <p>Both Parnell Road Bridge and Three Colt bridge (on Gunmakers Lane) are scheduled monuments and are the subject of a quinquennial Management Agreement between the Canal &amp; River Trust and Historic England.</p> <p>Given the vulnerability of Three Colt Bridge to graffiti, there would be benefit in promoting community involvement, including youth engagement, in the ongoing care of the structure, which would help</p>	<p>Support for Historic England's proposed rewording of policy. Additional site-specific points noted.</p>	<p>Adopted policy wording proposed by Historic England and include some of the specific points by way of explanation of the policy</p>
<p>GLA Culture and Creative Industries Unit response</p>			

Action CF2: Community Asset Transfer	London Plan Policy HC5 encourages boroughs to support and enhance their cultural offer.	Support for enhanced cultural offer noted	
	The Cultural Infrastructure Plan calls on local authorities to develop long-term community asset transfer policies.	Support for LBTH community asset transfer policy noted	
	Chisenhale Dance Space, Studios and Gallery play a significant role in London's cultural ecology. Officers support the suggestion made in the Neighbourhood Plan to explore the transfer of ownership of the buildings from Tower Hamlets Council, using Community Asset Transfer. This will create a sustainable basis from which these significant cultural assets can evolve and seek investment. The transfer should include the gallery space, dance space and studios.		include Culture & Creative Industries Unit evidence in plan.
	The GLA's 'A case for Dance Infrastructure' highlighted that dance infrastructure such as rehearsal space was in high demand. Preservation and investment of spaces such as Chisenhale Dance space are important to maintaining and securing supply in the long term	importance of dance infrastructure noted	
	The GLA's Artist Workspace Data Note identified that there are 11,500 studios in London, but only 13% have secure freeholds. Preservation of Chisenhale Artists' Studios would lead to increasing the long term stability of London's studios.	Comment noted	include this evidence in the plan
LBTH			

Policy HE1	Three of the heritage assets identified in this policy are already either listed by Historic England or locally listed - consequently, there is no need to include them as locally designated heritage assets in the neighbourhood plan, as this provides no additional protection to that which they already benefit from. The pubs in question are:		Revise plan and map to show the correct status of pubs: Nationally listed Grade II : The Crown, Lord Tredegar, Palm Tree. On TH local list: Eleanor Arms, Little Driver, Lord Morpeth, Victoria. Proposed as heritage assets: The Albert, Coborn Arms, Green Goose, Morgan Arms and Young Prince
	• The Crown – Grade II listed by Historic England	Comment noted	Crown removed and note added later in text that it's nationally listed
	• The Cherry – locally listed by Tower Hamlets Council under previous name The New Globe • The Little Driver – locally listed by Tower Hamlets Council	Comment noted	Cherry and Little Driver removed with note in text added that they are locally listed
	The remaining pubs are all located within Conservation Areas. Under Local Plan policy S.DH3, “significant weight will be given to the protection and enhancement of conservation areas”, and “there will be a presumption in favour of the retention of unlisted buildings that make a positive contribution to the character and appearance of a conservation area”. This Conservation Area designation provides essentially the same level of protection to heritage assets as local listing, and the Council does not therefore locally list buildings in Conservation Areas. However, we appreciate that the Roman Road Bow community may want to further emphasise the importance of these specific buildings, so we have no objection to them being identified as heritage assets in the neighbourhood plan.	Comment noted	

	<p>Within the Conservation Areas, part of the character that these pubs provide is not just the aesthetic qualities of the buildings, but their function as pubs – the Council would therefore be strongly in favour of retaining their use as pubs wherever possible. Policy D.CF4 of the Local Plan aims to protect pubs from changes of use, particularly through significant marketing requirements that must be met before a change of use is proposed. However, in line with our comments on Action HE1 below, this is perhaps an area where the neighbourhood plan could begin to consider how alternative models for pubs could help them to weather tough times such as the gradual recovery from the pandemic. This could include thinking about applications for pubs to become Assets of Community Value with the potential to become community-run in the future; but could also include thinking about the possibilities for flexibility in the use of pubs to encourage a wider range of community uses to operate from them – and how pubs might reasonably consider and mitigate the impacts of such flexibility.</p>	<p>Consider mentioning potential of pubs to become assets of community value, and potential for flexibility in the way pubs are used to include a wider range of community uses.</p>	<p>mention of the potential of pubs to become assets of community value to be included in justification for new types of pubs.</p>
<p>Action HE1</p>	<p>We support the underlying goal of this action, and agree that as currently written it is an ‘action’ rather than a policy. However, the neighbourhood plan could take the lead on this area and include something more ambitious that could be classified as a planning policy. At present the neighbourhood plan identifies what the forum thinks is a gap in the Local Plan policy in pubs. This is something that could be addressed when a review of the Local Plan takes place, but there is no requirement for this review to be finished until early 2025. In the meantime, the neighbourhood plan has the opportunity to think about how that gap could be filled, and how pub policy could take into account the suggestions around micro-pubs from the Tower Hamlets evidence base. In terms of broadening the locations in which pub proposals might be acceptable, the neighbourhood plan could provide policy and guidance around which locations might be suitable, and how potential negative impacts can be identified and suitably mitigated.</p>	<p>Consider whether we want to develop the action into a policy.</p>	

Action HE2	We are supportive of this proposal, and have no further comments at this time.	Comment noted	
Policy HE2	We are supportive of this proposal, although the forum should make clear whether they have had any engagement with the owner of the site. This is a good instance of the need to differentiate clearly between what is a planning policy and what is an 'action' – this seems very similar in intent to Action LE1, in that it attempts to set some parameters for a future redevelopment of the site, but one has been listed as a policy and one as an 'action'. If engagement has taken place with the site owner and details of what is expected on each site are provided, they could both act as site allocations and therefore be policies.	Canal and River Trust were contacted for the Reg 14 consultation. Forum to follow up with reference to Historic England's suggested wording for the policy. Emailed Canal & River Trust on 13/05/2021.	
Localresident	I am curious how the list of heritage pubs was compiled, in particular The Lord Tredegar seems a glaring omission. I'm not sure what new types of Public House means? While I'm a great fan of historic pubs with character we should recognise that not all residents drink alcohol and we should make sure they are catered for as well.		
Local resident	Designating Public Houses as Public Assets This is a great idea, but PLEASE can the Greedy Cow be added. It has an amazing history (Prince of Prussia changed to Prince of Wales in WWI when windows were smashed in anger). It is a modern pub, with beers on tap and needs protecting. The same is true of this row of shops in general which, as far as I can see, are not mentioned in any detail in the draft plan? Their undulating, non-uniform massing and skyline are quite wonderful and unique. And importantly they currently have 100% occupancy!!!	The terrace of buildings which includes the Greedy Cow at No. 2 Grove Road is locally listed and is within the Tredegar Square Conservation Area.	
	Chisenhale. This has laid in a state of semi-dereliction for many years and should be prioritised. It is historic with links to the Spitfire propeller production etc.	Comment noted	

Local resident	<p>Conservation Areas: The main objective is much needed, but the Plan must specifically include the full protection of local Conservation Areas which are constantly being challenged and eroded. We could see no reference to the Conservation Areas which are so important in Bow. The 'Outstanding Driffield Conservation Area' is not just the houses, the school and the factory but also the street scape – the rhythm of the street. Excess signage and changing the street pattern destroys the heritage as much as removing railings. The Plan should clearly state that the street scape in Conservation Areas will be protected and resist the unnecessary intrusion of pocket parks, especially when surrounded by a choice of park space five minutes' walk away.</p>	<p>The importance of Bow's conservation areas will be highlighted in the revised plan, including a map.</p>	<p>See top of the heritage section for revised text. Map of conservation areas needs to be added from draft plan folder</p>
	<p>Heritage Assets: Too many local heritage assets have been allowed to disappear. Including pubs, so their designation as local heritage assets is great. Heritage should include keeping shops as shops and resist conversion to residential and office space. If the Market is not already designated as a local heritage asset, it should be.</p>	<p>Roman Road Market is a conservation area</p>	
	<p>Bow Wharf: Similarly, the proposals for Bow Wharf are welcome. The state of the chimney in Bow Wharf should be included. The fibreglass replacement is now a done deal, but it has inevitably faded in the sun. There should e a requirement for the mobile phone mast operator to replace the right colouring to camouflage their destruction of the original.</p>	<p>Comment noted</p>	
	<p>The Heritage Trail update should include podcasts of local people's memories of the area.</p>	<p>Comment noted</p>	
<b>5. Affordable housing</b>			

<p>TFL Commercial Development (see document folder)</p>	<p>In reference to Objective 5 on High Quality Affordable Housing of the draft Neighbourhood Plan and key issues identified by the Forum such as the scarcity of land for housing and the affordability of rents, Optivo, one of the UK's largest housing providers (<a href="https://www.optivo.org.uk/about-us.aspx">https://www.optivo.org.uk/about-us.aspx</a>) and Transport for London Commercial Development are proposing to bring forward a key opportunity site opposite Bow Church DLR station in the near future. It is currently envisaged that the proposed development provides new homes, including a high proportion of affordable homes that will give local residents a choice to continue to live in the neighbourhood. Alongside this, ground floor business and retail space, as well as improved public realm and new area of play space are also being considered. It is intended that the development coming forward provides high quality design all round with architectural details inspired by the character of the Fairfield Road Conservation area. TFL CD looks forward to engaging with the neighbourhood forum as the scheme develops.</p>	<p>This site in Paton Close was considered for housing allocation in the plan and assessed by AECOM in their Dec 2020 report 'Site Options and Assessment', which gave the site an amber rating and concluded 'The site is potentially suitable and achievable.'</p>	
<p>Thames Water (see document folder)</p>	<p>Infrastructure requirements: In light of the changes which took effect in April 2018, and which are set out above, we would request that a paragraph is included in the Neighbourhood Plan which states: "Developers need to consider the net increase in water and waste water demand to serve their developments and also any impact the development may have off site further down the network if no/low water pressure and internal/external sewage flooding of property is to be avoided. Thames Water encourages developers to use their free pre-planning service (<a href="https://www.thameswater.co.uk/preplanning">https://www.thameswater.co.uk/preplanning</a>). This service can tell developers at an early stage if there will be capacity in Thames water and/or wastewater networks to serve their development, or what they will do if there is not. The developer can then submit this communication as evidence to support a planning application and Thames can prepare to serve the new development at the point of need, helping avoid delays to housing delivery programmes."</p>	<p>Comment noted</p>	<p>Paragraph added about developers needing to consider the implications of net increases in water and waste water and the impact of a development further down the network and of the availability of a free pre-planning service</p>



	<p>Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Typically, greenfield run off rates of 5l/s/ha should be aimed for using the drainage hierarchy. The hierarchy lists the preference for sursewer/drain &gt; Discharge rainwater to the combined sewer. Discharges to combined sewers should face water disposal as follows; Store Rainwater for later use &gt; Use infiltration techniques, such as porous surfaces in non-clay areas &gt; Attenuate rainwater in ponds or open water features for gradual release &gt; Discharge rainwater direct to a watercourse &gt; Discharge rainwater direct to a surface water sewer/drain &gt; Discharge rainwater to the combined sewer. Discharges to combined sewers should be separate onsite and combine only prior to the final manhole before the connection. To assist in capacity assessments, all applications should include current and proposed drainage plans, including points of connection and estimations of flow rates. This is particularly important for surface water and sites with multiple points of connection. In addition to SuDS, we support the inclusion of surface water and grey water reuse within developments.</p>	<p>The need for developments to follow London Plan Policy SI 13 on sustainable drainage noted.</p>	
<p>Thames Water (see document folder)</p>	<p>Policy H1 comments: There are a number of Thames Water assets in the Neighbourhood Plan area. In particular Thames Water own land directly north of the site allocated in Policy H1 (at the rear of gardens of Wendon Street and the A12). There are easements/wayleaves through the site near the north and south of the site which need to be considered. There are also several critical trunk sewers just outside the northern boundary of the site, if any below ground works were to take place measures would need to be in place to make sure they are protected as it forms part of the northern outfall sewer.</p>	<p>The advice about Thames Water assets immediately north of the Wendon St site is noted, and additional information requested about these from Thames Water. Thames water subsequently provided a map of the land they own to the north of the site.</p>	

	<p>If building over or close to a public sewer is agreed to by Thames Water, it will need to be regulated by a 'Build over or near to' Agreement in order to protect the public sewer, and/or apparatus in question. It may be possible for public sewers to be moved at the applicants request so as to accommodate development in accordance with Section 185 of the Water Act 1989. For water mains, the applicant may be required to pay for any mains diversions and new off-site mains, the applicant may be required to pay for any mains diversions and new off-site infrastructure. Further information can be found on Thames Water's website.</p>	<p>Need for 'build over or near to' agreement if building over or near to a public sewer noted.</p>	
LBTH			
Policy H1	<p>In theory, this allocation for housing is supported. In practice, as mentioned towards the beginning of this document, we have now found that this site appears to be partially inside the LLDC planning authority area. This complicates the situation, as the neighbourhood plan cannot allocate sites outside of its boundary, and the boundary needs to either be confirmed by the LLDC or altered to remove the part that is inside the LLDC. As stated earlier, we will work with the LLDC and the forum following the consultation to address this issue.</p>	<p>Noted, along with the need to work with LBTH an LLDC to resolve the boundary issue.</p>	
	<p>If this allocation is retained, a map of the site boundaries should be provided. The allocation could also identify further details of what would be acceptable on the site. It is good to identify that housing is an appropriate land use for this site, but are there any other requirements in terms of design, access, or infrastructure that might have been identified through the evidence base?</p>	<p>Forum to provide map of site boundary taking into account the LLDC boundary. AECOM report provides a site assessment.</p>	<p>Use site boundary shown in planning application by Place Ltd, PA/21/01162</p>

	<p>In section 8.2.3 there is a quote taken from the emerging Central Area Good Growth SPD about the 'unclear and fragmented character' of Bow. It should be made clear that this sentence in the SPD referred specifically to one particular housing typology found in Bow, the '21st Century Urban Housing Growth' typology, and does not refer to the character of Bow as a whole. Following this, the neighbourhood plan says of the SPD that "principles based on the character of different areas are then set out to guide future developments", which may lead to some misunderstanding of the role of the SPD – the SPD does not aim to set out principles based on the character of individual areas, but principles for particular contexts, types of site, or specific topics.</p>	<p>Noted, along with the need to work with LBTH an LLDC to resolve the boundary issue.</p>	<p>Link quote from Central Area Good Growth SPD to '21 Century Urban Housing Growth'.</p>
	<p>In section 8.2.4 a reference is made to well-designed homes and the climate emergency, but it's not clear what role these play in relation to the policy, as the text seems to talk about them only in general terms. If these are elements that should be reflected in the housing on the site allocation, this should be made clear (although also consider that in some cases, these may already be required by Local Plan policies).</p>	<p>Consider including reference to good design and implications of climate change in design principles to be followed on the site.</p>	
<p>Policy H2</p>	<p>This is another instance where adding more detail to the supporting text could be very useful. In particular, it would be an opportunity to define very clearly what is meant by a 'community led housing group', and to specify that these groups will need to be registered affordable housing providers. The Council's Affordable Housing Team have noted that it is usually the case that one provider would take on all of the affordable housing in a development – that is, both the intermediate housing and the social rented housing – whereas this policy currently only encourages community-led housing groups to take on the intermediate housing, requiring another registered provider to take on the social housing. However, while this is unusual, there's nothing that means this situation can't happen. As with some other policies in the plan, there should be lettering or numbering of the different clauses, which appears not to have come through in the final formatting.</p>	<p>Comment noted</p>	<p>Need to define community led housing, and mention this needs to be provided by registered affordable housing providers.</p>

Local resident	<p>Affordable: It would be good to see a local definition of affordable as too many new developments claiming to be affordable are way beyond the means of people most in need. The measures are laudable, but many more powers are needed – we recognise this is a national issue. All publicly owned land should be registered so when and if it were available for development, it is used to serve those most in need.</p>	Comment noted	
	<p>The plan should seek to prevent those social housing landlords who sell off their ‘valuable’ housing stock, i.e., houses in Victorian terraces. Those who rent should have as much a chance to live in them as those who buy.</p>	Comment noted	
	<p>Homelessness in Bow is too often hidden. More housing is an obvious answer. But so is consideration of provision for people who are single and homeless, so they do not have to leave the area that is their home. This means both accommodation and the necessary support services.</p>	Recent housing needs assessment highlighted the need for one-bedroom flats	
<b>6. Resilient and Well- Networked Community Infrastructure</b>			
Sport England	<p>NPPF paragraph 97 Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ul style="list-style-type: none"> <li>(a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</li> <li>(b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</li> <li>(c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.</li> </ul>	Comment noted	

	<p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p>	<p>We have considered the Council's Sports Facilities for the Future 2017-2027 report, but it is completely unrealistic to expect most young people from Bow to travel to the Olympic Park to access venues such as the Copper Box , as suggested by the local strategy.</p>	
	<p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.</p>	<p>The Local Plan , Section 12, Supporting Community Facilities, acknowledges the borough has gaps and priorities, including youth centres and indoor sports facilities (p.112) The plan looks to developers to provide the finance.</p>	

	<p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p>	<p>Support for the idea that ' If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered.'</p>	
	<p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p>		
LBTH			
Action CF1	<p>We are generally supportive of this proposal, although the text may need some rewriting for clarity – the text currently refers to “the Council working with Tower Hamlets Council for Voluntary Service”, and it's not clear quite what is meant here.</p>	<p>Review this action point as it is unlikely to be acted on as it stands</p>	

Action CF2	<p>The Council’s Asset Management Team has been consulted on this proposal, and does not support the proposal of a transfer of assets away from the Council. Section 9.3.1 refers to the Bow Arts Studio and Nunnery Gallery, Chisenhale Gallery and Dance Space, and the Arts and Ecology Pavilions. However, only one of these assets is actually mentioned in the text of the Action, so it is unclear why the reference is included to the other spaces. The Council would also like to note that it does not own the Bow Arts Studio and Nunnery Gallery. Section 9.3.1 also refers to problems with “historic lease arrangements of buildings owned by the Council but managed by local groups”, and the Council would like to note that such leases are not unchangeable – leases can be renegotiated where both parties can reach agreement about changed circumstances and where this would help to ensure proper maintenance and development of buildings.</p>	Comment noted	Clarify in the text that only Chisenhale is owned by the Council.
	<p>Section 9.3.3 refers to the General Disposal Consent (England) 2003 and says “local authorities are permitted to dispose of local authority land valued at two million pounds or less without the need to obtain specific consent from the Deputy Prime Minister and First Secretary of State”. This actually refers to the extent of undervaluation involved in a proposal, i.e. the Council does not need specific consent to dispose of assets for less than £2m under their market value.</p>	Comment noted	Clarify that local authority consent can be given to dispose of assets for less than £2m of their market value.

Policy CF1	<p>The aim of this policy is supported. However, we are concerned that it doesn't add much to the existing Local Plan policy D.H3, clause 5, which already requires the provision of new playspace on all developments of 10 homes or more, based on an assessment of the likely number of under-18s that will live in the development. There is a suggestion that money raised from CIL could be used to provide new play facilities, and this could allow developments smaller than 10 new homes to provide some contribution towards new playspace – although I note the caveats on developer contributions and CIL near the beginning of this consultation response. However, in this case, it would perhaps be useful for the plan to identify existing open spaces that would be well-suited to additional playspace, given the difficulties of providing significant new open spaces in the neighbourhood area.</p>	<p>We sought to identify existing open spaces suitable for new sports/play facilities. The LLDC industrial site at Crown Close (west of Wick Lane and south of Crown Close) could be a potential site for a commercial indoor sports centre. The site will revert to LBTH in 2024. Email suggesting site sent to LLDC and LBTH on 27/08/2021.</p>	



Policy CF2	<p>Again, we support the general aim of the policy, and our concerns are around the need for clarity about how improvements will be provided. A general discussion around the role of CIL and other developer contributions can be found near the beginning of this response. It is positive that the plan identifies two specific youth facilities that should be improved, and explicitly supports proposals for these improvements – although the supporting text should provide detail of what improvements are needed to give developers clarity. But the plan should also think more closely about how those improvements will be achieved. In general, the only way direct developer contributions would be used to improve these sites is if the sites themselves were being redeveloped with the youth facilities being re-provided – if this is what the forum has in mind, these could be reworked into site allocations that would set the suitable parameters of a redevelopment. If, on the other hand, the forum is anticipating that CIL would be used to fund improvements, this would be more suitable as an ‘action’ as discussed above.</p>	<p>Plicy CF2. We are not considering the sites being redeveloped, and so anticipate CIL or external funding being used to fund improvements.</p>	<p>Policy CF2 changed to an action point</p>
Policy CF3	<p>As discussed above, the specific proposal here to allocate CIL funding for the maintenance of community centres should be listed as an ‘action’ rather than a policy – this would highlight that this is a priority area for CIL allocation in the eyes of the local community. However, the neighbourhood plan cannot actually allocate CIL funding, which is the responsibility of the Council – it can only suggest priorities.</p>	<p>Consider changing policy CF3 to improve existing community centres, to an action</p>	<p>Policy CF3 changed to action point</p>
Action CF3:	<p>We are supportive of this proposal, and have no further comments on it at this time.</p>	<p>Comment noted</p>	

Local resident	<p>Are we planning to adopt a local design code for local development? The Government has recently introduced new plans in this regard which give local people much more control and input into the design of new developments, to preserve character and uphold standards. I think this is also something we could pursue.</p>	<p><a href="#">We do not plan to adopt design codes. The Central Area SPD</a> contains a dedign toolkit for small sites and a set of design principles</p>	
Lcal resident	<p>High quality affordable housing is of course a great objective. Is there any need or scope for including other housing measures, to the extent they are available, eg asking the Council to ban sales of new private market homes to overseas buyers or companies, and encouraging the Council to use their powers to bring vacant residential properties back onto the market for occupation? What is the Neighbourhood Forum's view of the Government's First Homes initiative and do we need to ask Tower Hamlets Council to fix particular parameters for its application in our local area? Is there also scope for a discussion of housing density, and how the increase in number of residents impacts on infrastructure and local traffic? Pressure on local primary school places has I think dropped from its height a few years ago, but do GP surgeries have more capacity?</p>	<p>Most of these suggestions are beyond the scope of neighbourhood plans, but community infrastructure and local traffic are included in the plan, as is the distribution of GP services .</p>	
Local resident	<p>We should looks at ways to discourage anti-social behaviour and foster a neighbourhood that feels safe for all residents, particular focus should be made on women, those part of the LGBT+ community, disabled, ethnic minority and the elderly. In particular pubs should be encouraged to join and to advertise the Ask for Angela scheme  <a href="https://www.met.police.uk/AskforAngela">https://www.met.police.uk/AskforAngela</a>. As a borough with a higher than average LGBT+ community I'd love to see a LGBT+ friendly venue in or around Roman Road.</p>	<p>Comment noted</p>	

Local resident	Spend tax payers money on the former brewery site in Chisenhale Road to give the school and the community some well thought out space. Ditch all of the stupid ideas of taking road space/parking spaces and create a really useful community space.	Comment noted	
Local resident	Chisenhale Studios: The proposal in CF2 to retain and repair the Chisenhale industrial buildings and wharf is very welcome, as is the support for the existing use of the buildings. The wharf would be a good location for a youth Boat Club (We'd be happy to arrange a visit to Laburnum Boat Club in Hackney) This would link well with the Adventure Playground and help solve the shortage of youth provision as well as provide a training function and enabling good health	Support for renovation of Chidenhale building and its use for youth activities is noted	
	Consortium: Often the most valued grass roots community organisations are run by volunteers. They do not have the time or energy or love of meetings to get into networks and are often disadvantaged as a result, notably access to funding, being in the 'in-crowd' with decision makers. The network can become hungry for funding to run itself. Community development is a far more effective method, and we urge a change in approach. This model will also ensure community centres are better used	Comment noted	
Local resident	Chisenhale gallery - love this proposal, lets make this happen! Fabulous potential in that building. Action needs to be taken now before it crumbles!	Support for idea of community asset transfer noted.	
<b>7. Other topics</b>			
LBTH	It has been brought to our attention by the London legacy Development Corporation (LLDC) that there is a problem with the designated boundary of the Roman Road Bow Neighbourhood Area. The LLDC is the local planning authority for some areas of Tower Hamlets around Fish Island and Hackney Wick. Within these areas, the LLDC currently has sole authority for planning functions, including the designation of neighbourhood areas and neighbourhood forums.		

Boundary of plan area	<p>The LLDC have noted that a small part of the Roman Road Bow Neighbourhood Area as designated by the London Borough of Tower Hamlets on 6 February 2017 appears to be within the LLDC area. This includes Payne Road and the area between Payne Road and the A118 (the McDonalds site); Wick Lane, and the area between Wick Lane and the A12; and parts of the western verge of the A12 north of Old Ford Road. This can be seen by comparing the two maps below.</p>		
	<p>The Roman Road Bow Neighbourhood Area should not have been designated in these areas by Tower Hamlets – designating neighbourhood areas and forums in these areas is the sole responsibility of the LLDC. We will work closely with the neighbourhood forum and the LLDC following this consultation to address this issue and find a way forward. Depending on the approach the forum wishes to take, this could include redesignating the neighbourhood area to be entirely within the Tower Hamlets planning authority area (removing the sections currently in the LLDC); or, if the forum wishes to retain the sections in the LLDC, supporting the forum in applying to the LLDC for designation.</p>		

	<p>There are three particular impacts of this situation that should be noted. Firstly, the site allocation in Policy H1 of the neighbourhood plan appears to partly be located in the LLDC, and the decision taken on how to proceed with the designation issue will have an effect on this site. Secondly, one of the proposed Local Green Spaces is entirely within the LLDC. Thirdly, there is a possibility that a second Regulation 14 consultation may need to be held once the boundary issue is dealt with. We will seek legal advice on whether a re-run of the consultation is needed if the boundary is corrected to be only within Tower Hamlets. Given the small amount of land directly affected, we are hopeful that a re-run will not be needed, and this consultation response document provides full comments on the draft neighbourhood plan in the hope that it will not be necessary to re-consult.</p>	<p>The Forum accepts part of the site allocation under Policy H1 is within the LLDC boundary, and that this part cannot be allocated. We accept also that the proposed Wick Lane local green space also lies within the LDDC area and cannot be designated.</p>	
Policies and actions	<p>Ideally, the 'actions' would be presented in an annex at the end of the document, as suggested in the Planning Practice Guidance on neighbourhood planning, paragraph 004. However, we recognise that given the way the document is laid out, and the inclusion of 'actions' across numerous different topics, this would be difficult to achieve. On that basis, to further ensure that the distinction between 'policies' and 'actions' is clear, we would suggest two changes:</p>	Comment noted	

	<ul style="list-style-type: none"> <li>• Within each chapter, the 'actions' should all be placed after the policies – in the chapters on objectives 4 and 6, the actions are currently interspersed with the policies.</li> </ul>	Comment noted	<p>Switch 7.4 and 7.5 so the Bow Wharf policy is 7.4 and heritage trail action 7.5.</p> <p>Policy sections 9.4, 9.5. and 9.6 to become 9.2, 9.3 and 9.4 respectively.</p> <p>Action sections 9.2, 9.3 and 9.7 to become 9.5 and 9.6. 9.7 action remains the same</p>
	<ul style="list-style-type: none"> <li>• The 'actions' should be renumbered so they don't replicate the numbering of the policies – for example, there is currently a Policy LE1 and an Action LE1, which creates the potential for confusion. We would suggest that consecutive numbering would be an acceptable solution here, when combined with the suggestion above to ensure that the policies are always placed before the 'actions' in each chapter – for example, the first objective chapter would then have Policy LE1, Action LE2, and Action LE3.</li> </ul>	Comment noted	<p>Adopt consecutive numbering for policies and actions so duplication of numbers is avoided</p>

Supporting Text and Level of Detail	<p>There is a need for more detail in the supporting text to explain the nuances of how policies will be applied. At the moment, policies are followed by references to various evidence base documents to demonstrate conformity, and a brief justification for the inclusion of a policy on the relevant topic. However, in most cases, there is also a need to provide an explanation of how the policy works in detail. The policies themselves are admirable in their brevity, but many of them do not meet the requirement of the Planning Practice Guidance on Neighbourhood Planning that “a policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications”. The addition of greater supporting detail will be necessary to help Council planning officers apply these policies in practice. Specific examples of this will be discussed where relevant below.</p>	Need for greater supporting detail for policies will be considered	
Developer contributions	<p>A recurring issue throughout the plan is the use of references to developer contributions. It is useful that the plan recognises that these contributions are a key way of delivery planning goals in the borough, but more clarification is sometimes needed about what kind of contribution is expected to deliver particular outcomes. Broadly speaking, there are two common kinds of contribution:</p>	comment noted	
	<p>S106 and S278 (for highways) – these are direct developer contributions that are made a condition of the planning permission and must relate directly to the development itself. For example, where a development on a site will have a very direct impact that needs to be mitigated to make the development acceptable, S106/S278 contributions would be justified. These would therefore generally be used for interventions that are located on, or very close to, the development site, and not for wider improvements.</p>	comment noted	

	<p>Community Infrastructure Levy (CIL) – this is a levy raised on most new development on the basis of the amount of floorspace delivered. This money can be spent on infrastructure that is not directly related to a specific development, but addresses wider needs in the area. On occasion, developers may choose to deliver some infrastructure themselves as ‘CIL-in-kind’, with a corresponding reduction in their CIL bill.</p>	<p>comment noted</p>	
	<p>In neighbourhood plans, it may be possible to identify some situations in which direct developer contributions will be required, particularly on site allocations where it can be clearly shown that a development on a particular site will have a direct impact that needs to be mitigated. In most other situations, neighbourhood plans will be looking at identifying priorities for the spending of CIL. Once a neighbourhood plan is adopted as part of the development plan, it is required that 25% of the CIL raised in the neighbourhood area should be ring-fenced for use on projects that benefit the neighbourhood area (although note that these projects don’t necessarily need to be inside the boundaries of the neighbourhood area, if an improvement outside the area would provide suitable benefits for residents within the area).</p>	<p>Comment noted</p>	



<p>The plan and CIL</p>	<p>Both of the neighbourhood plans that have reached at least examination stage in Tower Hamlets (Isle of Dogs and Spitalfields) have contained sections that set out the forum's priorities for CIL expenditure. It is the Council's position that the inclusion of these lists of CIL priorities is an appropriate measure for a neighbourhood plan to take, as long as these are set out as 'community aspirations' (what the Roman Road Bow Neighbourhood Plan would call an 'action') rather than as planning policies. This is because a planning policy should set out how a planning application can be assessed, and can't mandate any particular body to bring forward any particular project. Specifically, the neighbourhood plan can't tell the Council how CIL money must be spent; but can suggest projects on which the local community think it should be spent. Due to the extensive process that neighbourhood plans go through before adoption, this would be given significant weight in future considerations about how to spend CIL money in the area.</p>	<p>Consider setting out the Forum's CL priorities as a separate section of the plan.</p>	<p>A list of the Forum's priorities for CIL funding was added at end of revised plan.</p>
	<p>The Roman Road Bow Neighbourhood Plan does not currently have such a list of CIL priorities in a single place, although a number of projects can be identified in various parts of the document. There is no requirement to have a section on CIL priorities in the plan, but we would suggest that the neighbourhood plan could consider whether this would be a useful addition to identify the specific projects they would most like to see CIL money spent on.</p>	<p>Comment noted</p>	

References to planning documents	Some references need to be updated. References to the London Plan should now date it from 2021, as the final version of the plan was adopted on 2 March 2021. References to the Tower Hamlets Planning Obligations SPD should be dated March 2021, as this SPD has now been adopted. There are also references in sections 9.4.3 and 9.5.3 to the previous version of the Planning Obligations SPD – this document has now been revoked, and the references should either be deleted or similar quotations should be found in the newly adopted version. For both of these newly-adopted documents, it would be sensible to double check that paragraph or page references have not changed in the final documents.	Comment noted	Update references to the London Plan 2021 and LBTH SPD of March 2021
Formatting	The document currently uses endnotes for references – we think footnotes would be a better choice, as it allows the reader to more easily see what is being referred to at the bottom of the page, rather than having to switch to the end of the document. In some instances, the endnote numbering in the text also appears in full size rather than superscript, for example at section 8.2.4, where the evidence on local need for affordable housing is said to be from ‘March 202041’.	Comment noted	
	The figures in the document are all numbered as ‘1.[x]’ – as there are no figures labelled ‘2.[x]’, there appears to be no reason for the use of prefix ‘1’. The figures could just be labelled 1, 2, 3, 4, and so on. There are also unnumbered figures on pages 9, 53-4, 58-9, and 81.	Comment noted	Delete prefix '1' to the figure numbers. Add numbers to figures on pages 9, 53-54, 58-9, 81
	Some paragraphs, including some policy boxes, appear to be intended as bullet-pointed lists, but are not showing in this way – for example, sections 2.2.1 and 2.2.2, and Policy H2. Without the bullet points, these are confusing to read due to the lack of full stops.		

Introduction, Context, Vision	<p>The primary issue is around the description of the ‘presumption in favour of sustainable development’ at section 1.4.1. The first paragraph says “if a planning application is made which is considered to be sustainable development then there has to be good reason for rejecting the proposals”. This is not wrong, per se, but it leaves out the question of how we reach the conclusion that a proposal represents sustainable development. Paragraph 11 of the NPPF tells us that sustainable development comes about when there is an up-to-date plan in place which seeks to meet the development needs of the area, with some flexibility to adapt to change. If this plan exists, then sustainable development is development that conforms to the plan. We would suggest this sentence be replaced with something more like the following: “It includes a presumption in favour of sustainable development, <b>meaning that the development plan should seek to meet the needs of the borough for housing and other uses; and that planning proposals which accord with an up-to-date development plan should be approved.</b>”</p>	Comment noted	<p>Adopt the suggested alternative wording: “It includes a presumption in favour of sustainable development, meaning that the development plan should seek to meet the needs of the borough for housing and other uses; and that planning proposals which accord with an up-to-date development plan should be approved.”</p>
	<p>In section 1.4, for clarity, the second paragraph should read: “The Neighbourhood Plan, <b>once adopted, will represent</b> one part of the development plan...”. In figure 1.4, the key is hard to read, there seems to be some overlapping elements obscuring parts of it.</p>	Comment noted	<p>Change to “The Neighbourhood Plan, <b>once adopted, will represent one part of the development plan...</b>”</p>
LBTH	<p>1. This document forms the response of the London Borough of Tower Hamlets (“the Council”) to the second Regulation 14 consultation the second Regulation 14 consultation on the Roman Road Bow Neighbourhood Plan, as the second Regulation 14 consultation on the Roman Road Bow Neighbourhood Plan, as prepared by the Roman Road Bow Neighbourhood Forum (“the Forum”), held between 5 July and 15 August 2021.</p>		

(Response to impact of boundary changes)	<p>2. We recognise that this second round of consultation is specifically in response to a boundary change that was made on 30 June 2021. This change was in response to the realisation, during the first Regulation 14 consultation, that the original designation of the Roman Road Bow Neighbourhood Planning Area had inadvertently included land that is within the London Legacy Development Corporation (LLDC) planning area. The Council did not have the authority to designate land in this area for planning purposes, and did not intend to do so. This designation of LLDC land was recognised by the Council as a mistake once it was brought to our attention, and was corrected. In discussion with the Forum and the Council's legal team, it was felt necessary to run a second round of Regulation 14 consultation on the neighbourhood plan to invite representations on the impacts of the boundary change.</p>	comment noted	
	<p>3. The boundary change moves the boundary slightly to the west of where it was originally designated, and removes a small but significant area of land from the Roman Road Bow Neighbourhood Planning Area, and has effects on two policies. As the issue of the boundary mistake had been brought to the Council's attention before we submitted our response to the original Regulation 14 consultation, we included a discussion of its impact in that response. However, for the sake of comprehensiveness, we will briefly reiterate our position here. This document should be read in conjunction with our original regulation 14 consultation response.</p>	comment noted	
	<p>4. We understand that an update to the draft neighbourhood plan has not been made at this stage, so our response relates to the content of the draft neighbourhood plan that was consulted on in the first Regulation 14 consultation.</p>	This understanding is correct	
	<p>5. The land to the east of Wick Lane was included in neighbourhood plan policy PS2 as a potential Local Green Space. This land has now been removed from the neighbourhood planning area, and should no longer be included in policy PS2.</p>	comment noted	Land to the east of Wick Lane proposed as a Local Green Space withdrawn from the draft plan.

	<p>6. A portion of land on the western bank of the A12, to the rear of Candy Street and Wendon Street, has been removed from the neighbourhood planning area. This land was included as part of policy H1, a housing site allocation for the “site between the rear gardens of Wendon St E3 2LW and the A12”. The change to the neighbourhood planning area boundary means the boundary of the site allocation will also need to be changed, and the area of land that can actually be allocated will need to be reduced. This may have an impact on how viable the allocation is. However, from discussions with the Forum and the LLDC, we understand that it may be the case that enough land remains in the neighbourhood planning area for a housing allocation, with land in the LLDC area acting as a buffer from the A12. Whether this is the case is a matter for the Forum to consider.</p>	comment noted	<p>The site proposed for housing to the rear of Candy St.and Wendon St. has been reduced in size. The land along the western edge of the A12 within the LLDC has been removed from the site.</p>
	<p>7. In paragraph 60 of our response to the original consultation, we stated that “in theory, this allocation for housing is supported”, and this is still the case, if the neighbourhood plan can provide a convincing case that housing on this site is feasible. We also noted, in paragraph 61, that a map of the site boundaries should be included, and that requirements related to design, access and infrastructure should be considered as part of the allocation. These comments would be relevant to any site allocation, but are particularly important for such a tightly constrained site as this.</p>	comment noted	<p>The revised site boundaries will be those in the planning application PA/21/01162/A1 submitted in June 2021 by Place Ltd and LBTH.</p>
	<p>8. The Council does not believe there are any other impacts of the boundary change on the draft neighbourhood plan. Our comments from the original Regulation 14 consultation still apply on all other aspects of the plan.</p>	comment noted	

National Grid (see document folder)	the boundary is corrected to be only within Tower Hamlets. Given the small amount of land directly affected, we are hopeful that a re-run will not be needed, and this consultation response document provides full comments on the draft neighbourhood plan in the hope that it will not be necessary to re-consult.	Noted, but a new consultation was required by LBTH.	
Local resident	1 Roman Road “and Bow” Neighbourhood Forum? If Tower Hamlets Council has designated “Roman Road Bow” as a neighbourhood area and with a neighbourhood forum, why, then, are you referring to yourselves as “Roman Road AND Bow Neighbourhood Forum”? This is inaccurate and misleading for two reasons: 1. There has already been a name change, quite rightly, from the original proposal of “Roman Road Neighbourhood Forum” as only half of Roman Road lies within the Forum area. 2. Bow covers a larger area including in the south, for instance, parts of other wards such as Mile End, Bromley North and Bromley South. Furthermore, I believe that the name in itself is conducive to bias as you will see from the remarks that follow, and I suggest that “Bow East-West (BEW) Neighbourhood Forum” would be terrifically accurate and inclusive. [Slogan: BEW is Beautiful!]	Roman Road Bow' is the formally designated name of the forum and plan area.	
	2 North/South/East/West? I live within the MEOTRA / Mile End Old Town Residents Association Area. It was the Forum which was keen to venture south of the railway line and include MEOTRA rather than vice versa. And yet, on examining the Draft Plan, I find a heavy emphasis on the north of the area. Whereas there is an analysis of shops on Roman Road, Bow Road is mentioned mainly in relation to the tube station or the Business Centre, and there is no mention of shops on Grove Road or near Bow Church. As for Fairfield Road, it does not figure at all.	Comment noted	

	<p>3 Consideration given to different Age Groupings? In the Draft Plan there are 38 references to “youth” and 22 references to “child” or “children”, a total of 60 references. There is a single reference to “older people”, at point 8.2.4: “The population projections show that the older population is set to more than double by 2041”. [My bold] 60 references to younger people and 1 to older people: would you say that you have given sufficient consideration in the Draft Plan to the existence of older people and to their evolution of Bow East and Bow West?</p>	<p>Comment noted</p>	
	<p>4 Community Space The Draft Plan at 2.1.1 points out that “The market once attracted visitors from across London, but has been in decline in recent years”. On the other hand at Objective 3 it states that “The former car park on the corner of Roman Road and St Stephens Road plays a valuable role as a community space”. Amongst the reasons for the decline of Roman Road Market is the withdrawal of readily available parking. I know that the former car park played a valuable role as a community space when it was a car park, and not only for the market but for other visitors including medical ones.</p>	<p>Comment noted</p>	
	<p>5. Transport I am delighted to see at 5.3 that the Council is to work with TfL “to ensure step-free access at Mile End underground” as this would help those with physical needs and those (often visitors to Queen Mary) burdened with luggage</p>	<p>Comment noted</p>	
	<p>6 Priorities and Benefits In short, and sadly, the current Draft Plan fails to reflect properly the Neighbourhood Area or its Community.</p>	<p>Comment noted</p>	
	<p>We should look at ways to discourage anti-social behaviour and foster a neighbourhood that feels safe for all residents, particular focus should be made on women, those part of the LGBT+ community, disabled, ethnic minority and the elderly. In particular pubs should be encouraged to join and to advertise the Ask for Angela scheme  <a href="https://www.met.police.uk/AskforAngela">https://www.met.police.uk/AskforAngela</a>. As a borough with a higher than average LGBT+ community I’d love to see a LGBT+ friendly venue in or around Roman Road.</p>	<p>Comment noted</p>	

Local resident	<p><u>Climate emergency: As the document below from the Centre for Sustainable Energy explains, too many Local Plans fail to address the enormous changes that are going to have to be implemented within the timespan of any decade-long plan, such as yours.</u></p> <p><u>Yes, bike routes and car reductions are addressed, but, doesn't the Local Plan need to go much further into details about intentions for urgent Carbon Auditing of all property (New build and historic), ramping up the availability of car charging points, wholesale replacement of gas boilers etc.</u></p> <p><u>LBTH have pledged to make their operations Net Zero Carbon by 2030, so all this has to be 'locally planned' now. They aim for the entire Borough to be Net Zero Carbon by 2050 and again, the dialogue in any plan about how this will be achieved at a local-level needs to be advancing right now.</u></p> <p><u>Surely, 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?</u></p> <p><a href="https://www.cse.org.uk/news/view/2484">https://www.cse.org.uk/news/view/2484</a></p>	These comments were carefully considered, but it proved too late to introduce major new policies at this point. They would need a lot of research and evidence gathering, and would be likely to lead to a Strategic Environmental Assessment and further long delay in the plan making process	Reference to low carbon homes was included in the Reg 14 draft plan, and policy H3 was added in updated plan, for significant renovations of existing residential properties.
Local resident	<p>Rubbish collection. Perhaps minor and dull. But it strikes me as an issue that really impacts the character of the area. I live roughly opposite the old Percy Ingles on the far eastern end of Roman Road. And we have to dump all our rubbish (and recycling) on the pavement outside the old Percy Ingles. This then leads to folks dropping their loose bottles etc on top, and a general dirtiness ensues. What can be done to address this? Same thing for recycling - why is it so tricky in Tower Hamlets? What more can be done?</p>	Comment noted	
Local resident	<p>Fully on board with everything here. Let's get it done and see real meaningful change!</p>	Comment noted	



	<b>RESPONSES TO CONSULTATION OVER IMPACT ON PLAN OF BOUNDARY CHANGES</b>		
Natural England	Natural England does not consider that this boundary change on the Neighbourhood Plan poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.	comment noted	
National Grid	Avison Young responded on behalf of the National Grid. There was no comment relevant to the boundary change, but a map was sent which showed the underground cable running under the tow path of the Hertford Union canal south of Victoria Park.	comment noted	
LLDC	Many thanks for consulting the LLDC in relation to the change to the Roman Road Bow Neighbourhood Plan boundary. 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.	Comment noted	
TfL Commercial Development	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.	Comments noted	

TfL Planning	Thank you for consulting Transport for London (TfL) on the boundary change. We have no comments to make on the proposed change but we note that the land now excluded from the Neighbourhood Area is adjacent to the A12 which forms part of the Transport for London Road Network (TLRN).	Comment noted	
Canal & River Trust	Within the proposed Neighbourhood Plan Area, the Trust owns and manages the Hertford Union Canal and their respective towpaths. We also own and manage Skew Bridge, and Parnell Road Bridge, on the Hertford Union Canal. The canals form a key part of the Blue Ribbon Network, and provide important areas for cultural activities, a heritage asset and, increasingly, are a space where Londoners are choosing to live. Waterways can also provide a resource that can be used to heat and cool buildings, a corridor in which new utilities infrastructure can be installed and a way of sustainably draining surface water away from new developments. In celebrated its 200-year anniversary. The canals bring a unique heritage value to the areas they pass through, and contribute to a strong identity of place.	Comment noted	
	We have reviewed the proposed changes to the Neighbourhood Plan area, and have no further comments to make.		
	We would reiterate our comments on the previous consultation, regarding the map of the Neighbourhood Area. We note 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. The canal should be the starting point in designs for waterside development, and is an important part of local blue/green infrastructure.	Comment noted	
Rushanara Ali MP	My office is currently dealing with a very high volume of correspondence related to the COVID-19 situation and is prioritising urgent and emergency cases for residents who need immediate support.	Comment noted	

Growing Concerns	We have received your email, thank you!	Comment noted	
Chisenhae Dance Space	Thank you for your email.	Comment noted	
Local resident	to whom read this I am writing to inform you about the idea of the liveable streets I am a delivery driver and ever since these liveable streets have been set in place you have made life a living hell to get to people's property and on time because we having to walk more further to get to them instead of being on time for them which is a breach of health and safety	Comment noted, but no Liveable Street measures in Bow had been implemented up to the date of this representation (July 3rd 2021).	
Local resident	I object to the proposed change to the boundary of the Roman Road Bow Neighbourhood Plan for the following reasons:		
	1. I do not believe that the LLDC should have juresdiction over land to the west of the A12 Blackwall Tunnel road	The LLDC do have authority over small plots of land West of the A12, but these will revert to LBTH for plannng purposes around 2024, as part of the LLDC exit strategy.	
	2. The LLDC wants to convert the foot/cycle bridge which crosses the A12between Old Ford Road and Crown Close into an all-traffic bridge. This would be a disaster for traffic levels in Bow and completely contrary to the support of local people for the Liveable Streets proposals for Bow	A bus accessible bridge was in the LBTH 2017 infrastructure development plan (estimated cost £32m), but there is currently no funding or delivery date.	

	3. The LLDC opposed plans for affordable housing on the brownfield site behind Wendon Street because the proposals threatened their plans for a road bridge between Old Ford Road and Crown Close. bridge between Old Ford Road and Crown Close.	LBTH and Place Ltd submitted a planning application for the site behind Candy St PA/21/01162 in June 2021 for 16 modular units of temporary housing for 10 years.	
	The Neighbourhood Plan should oppose the LLDC's plans for a road bridge between Old Ford Road and Crown Close, oppose the claims of the LLDC to any	comment noted	
	land west of the A12 and support the original proposals for affordable housing on the brownfield site behind Wendon Street.		
	<b>RESPONSES TO CONSULTATION ON STRATEGIC ENVIRONMENTAL ASSESSMENT SCOPING</b>		
Environment Agency	The agency's NP advice note was sent as an attachment . The covering email said 'We have had to prioritise our limited resource and focus on strategic plans where the environmental risks and opportunities are highest.'	comment noted	
The Coal Authority	The Coal Authority is only a statutory consultee for coalfield Local Authorities. As London Borough of Tower Hamlets is outside the coalfield, there is no requirement for you to consult us and / or notify us of any emerging neighbourhood plans.	comment noted	