



Roman Road Neighbourhood Plan 2021-2031

Regulation 14 representations received

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

Summary of Regulation 14 Representations, September 2021		
	Dates of Reg.14 consultations:15 March to 27th April 2021 and 5th July to 15th August 2021	
Organisation/ resident		Response by RRB For
1. High street and local economy	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	
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		
Policy LE1: Encouraging	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
	London Plan Policy E3 supports the aspiration to secure affordable workspace at rents maintained below the market rate for social and	
	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	Comment noted
LBTH		
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
	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.	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>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>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>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 new 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>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>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
	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.
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
Action LE3	We are supportive of this proposal, and have no further comments on it at this time.	Comment noted

Local resident	<p>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?</p>	Comment noted
	<p>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 https://www.instreatham.com/ In any plans for Roman Road we should make sure that accessibility for disabled residents is considered and prioritised.</p>	Liveable Streets programme will make market area pedestrian-only during daytime.
Local resident	<p>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.</p>	Comment noted
	<p>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.</p>	Comment noted
Local resident	<p>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.</p>	Evidence noted of challenges experienced by local people who try to find meanwhile use for empty retail units

	<p>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.</p>	<p>Noted and informed resident about Roman Road Trust</p>
Local resident	<p>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.</p>	<p>Comment noted</p>
Local resident	<p>I applaud the commitment to flexible use of retail space on Roman Road, and urge you to go further if possible.</p>	<p>support for flexible use of retail use noted</p>
Local resident	<p>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.</p>	<p>support for rejuvenating the market noted</p>
Local resident	<p>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!</p>	<p>support for meanwhile use of empty units noted</p>
Local resident	<p>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.</p>	<p>plea for shifting balance away from, retail towards other uses, including cafes and restaurants on the Roman</p>

Local resident	Objective 1: Thriving High Street and Local Economy	
	economy as we remember the problems caused to local residents, and the police,	Noted that development of
Local resident	make a bigger point to allow for more cafes and restaurants onto roman road. I	Noted, - comment supports the shift
Local resident	Roman Road. There is nothing we can't buy except perhaps a car and a holiday.	Comment noted
resident	include ourselves in 'some resident'. The market is popular with those who want	Noted that a local market calling
	that is and could be promoted as a Tower Hamlets wide and regional resource.	relevant issue of
same local resident	great. Need more workplaces to back this up. It isn't clear where the shared	Comment noted
streets		
LBTH		
Policy GS1	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	Comment noted
	set out below:	
	(perhaps in supporting text) what kind of contributions are envisaged here, and to	Comment noted
	improvements to cycle lanes? If so, this should be said more explicitly. While the	Comment noted
	emphasise the need for sites to enable connections to existing routes.	Comment noted
	• Clause 4 – presumably this refers to “new public bicycle stands”.	Comment noted
	Hamlets Local Plan, which set out what an appropriate level of bicycle storage is	Comment noted
	‘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.	Comment noted
	needed” – this would set an expectation that pedestrian facilities such as seating	Comment noted
	where safer crossings may be needed? Or alternatively, to state that this will be	Comment noted
	addition of “where needed”, as the provision of new bus facilities will obviously be	Comment noted

	supporting text to set out what kinds of street clutter are most problematic in the	Comment noted
	policy – St Stephen's Road and Grove Road (Grove Road is included, but only	Comment noted
Action GS1	policy (or combined with the existing Policy GS1). Clause 1 appears to be very	Comment noted
	Grove Road be changed to say 'high-quality', on the basis that a segregated track may	Comment noted
Local resident	refer to 'bicycle', this should be changed to 'cycle' as it is deemed more inclusive as it	Comment noted
	outside Tesco in Gladstone Place.	Comment noted
Local resident	junction. I have raised this on numerous consultations over the years and still	Comment noted
Local resident	often have conflicting interests e.g. cycle lanes behind bus stops. on park paths,	Comment noted
	skateboards etc which are on the increase and can go extremely fast in public	Noted, but electric
	period of this Plan. Already, we see electric charging wires across pavements from	the issue of
	contradicted by 'well signed footpaths'. It is certainly contradicted in practice in	electric charging
	spaces do not pay enough attention to what happens after dark, and community	Comment noted
	Mile End Station: Step free access at Mile End would be wonderful.	
public		
Agency	environment and together with Natural England, English Heritage and Forestry	Comment noted
	http://webarchive.nationalarchives.gov.uk/20140328084622/http://can.environment-agency.gov.uk/LIT_6524_7da381.pdf	Comment noted
LBTH		
Policy PS1	policy itself. Again, the supporting text could include a 'how this policy works'	Consider adding a 'how this policy
Policy PS2	Spaces well. It's not clear what level of engagement there has been with the	The local events in
	criteria of being in close proximity to the community and local in nature. The	the amenity open spaces on housing

	open spaces in the borough (and not just those that are classed as 'publicly	Given the lack of local sites for
	and are supportive of their sites being designated, we would likely defer to their	Comment noted
	meet the test of being demonstrably special and locally significant to justify	This counters the
	we would not say that this site has enough significance to justify the designation.	points made, as we disagree, as this is a precious
	historical interest, we support this site being designated as Local Green Space.	
	<ul style="list-style-type: none"> • 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. • Manilla 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 	This space is on a dense, high rise
	Hamlets and beyond, it could be said that this site holds particular recreational	one of very few
	<ul style="list-style-type: none"> • 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 	This site only differs from others
	playspace, and particularly its role as an adventure playground providing larger	This amenity green space is the only
	accessible open space, a Site of Importance for Nature Conservation, and,	Comment noted
	<ul style="list-style-type: none"> • 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 	SINCS are non-statutory and AS the site is located in the
	Green Spaces'. This should be altered – in the context of Policy PS2, the term	we need to rename figure 1.22
Local resident	and community spaces. I recently moved from Shoreditch where I was Chair of	Suggestion noted for opportunities
Local resident	have the support of the residents affected and will be welcome. However, there is settled down and both intended and unintended consequences become clear, the	The Crisemare changes are part
	parks. They are dangerous and too many ignore the 'slow' signs for cyclists.	This is a valid park management
Local resident	be in place before QMUL attempts to build an 8-10 storey line of buildings	Support for protecting green
	End Park, I am disappointed that FOMEP was not approached about the proposal	
	Mile End Park and at others as "adjacent" to the park. For clarity, Wennington	The survey by Friends of Mile
	the "Art Pavilion" (with one "I")	
	debatable. I think COVID has put change to that (again the FOMEP user survey	
4. Heritage		
HISTORIC England (see	detailed advice and approaches to identifying heritage assets and the contribution	Consider highlighting in text
	identified is clearly set out. As NPPF Policies for locally listed assets require	Review heritage significance of

	and enhancement. This could benefit from minor editing to strengthen the	Review policy HE2
	the historic character of the area and how they will enhance both its	Review policy and consider the new
	include leisure and recreational activities and affordable workspaces for	
	relevant Local Plan and national policies relevant to the proposals. We would	Consider reducing
	interest (Archaeological Priority Areas). An analysis of TowerHamlets APA's was	length of local and Consider mention of APAs as a
Canal & River Trust (Heritage and Environment)	<p>The Canal & 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</p>	<p>Support for Historic England's proposed rewording of policy. Additional site-specific points noted.</p>
GLA Culture and Creative Action CP2: Community		
	cultural offer.	Support for enhanced cultural
	The Cultural Infrastructure Plan calls on local authorities to develop long-	support for LBTH community asset
	ecology. Officers support the suggestion made in the Neighbourhood Plan to explore the	
	The GLA's 'A case for Dance Infrastructure' highlighted that dance	importance of dance
	London, but only 13% have secure freeholds. Preservation of Chisenhale Artists'	Comment noted
LBTH		
Policy HE1	Historic England or locally listed - consequently, there is no need to include them	

	• The Crown – Grade II listed by Historic England	Comment noted
	New Globe • The Little Driver – locally listed by Tower Hamlets Council	Comment noted
	policy S.DH3, “significant weight will be given to the protection and enhancement	Comment noted
	just the aesthetic qualities of the buildings, but their function as pubs – the	Consider mentioning
Action HE1	is an ‘action’ rather than a policy. However, the neighbourhood plan could take the	Consider whether we want to
Action HE2	We are supportive of this proposal, and have no further comments at this time.	Comment noted
Policy HE2	they have had any engagement with the owner of the site. This is a good instance	Canal and River Trust were
Local resident	Lord Tredegar seems a glaring omission. I’m not sure what new types of Public	
Local resident	the Greedy Cow be added. It has an amazing history (Prince of Prussia changed	The terrace of buildings which
	be prioritised. It is historic with links to the Spitfire propeller production etc.	Comment noted
Local resident	specifically include the full protection of local Conservation Areas which are	The importance of Bow’s
	Including pubs, so their designation as local heritage assets is great. Heritage	Roman Road Market is a
	chimney in Bow Wharf should be included. The fibreglass replacement is now a	Comment noted
	the area.	Comment noted
5. Affordable housing		
TFL Commercial Development (see document folder)	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 (https://www.optivo.org.uk/about-us.aspx) 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,	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’

Thames water (see	and which are set out above, we would request that a paragraph is included in the Sustainable drainage of the London Plan 2021. Typically, greenfield run off rates	Comment noted The need for developments to
(see	Neighbourhood Plan area. In particular Thames Water own land directly north of	The advice about Thames Water
	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	Need for 'build over or near to' agreement if building over or near to a public sewer noted
LBTH		
Policy H1	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	Noted, along with the need to work with LBTH an LLDC to resolve the boundary issue
	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	Forum to provide map of site boundary taking into account the LLDC boundary
	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	Noted, along with the need to work with LBTH an LLDC to resolve the boundary issue.

	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).	Consider including reference to good design and implications of climate change in design principles to be followed on the site.
Policy H2	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	Comment noted
Local resident	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	Comment noted
	'valuable' housing stock, i.e., houses in Victorian terraces. Those who rent should	Comment noted
	But so is consideration of provision for people who are single and homeless, so	Recent housing needs assessment
and Well-		
Sport England	land, including playing fields, should not be built on unless:	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>
	neighbourhood plan should be based on a proportionate assessment of the need	Section 12,
	existing sports facilities do not have the capacity to absorb the additional demand, Practice Guidance (Health and wellbeing section), links below, consideration	Support for the idea that ' If
LBTH		
Action CF1	rewriting for clarity – the text currently refers to “the Council working with Tower	Review this action point as it is
Action CF2	does not support the proposal of a transfer of assets away from the Council.	Comment noted
	“local authorities are permitted to dispose of local authority land valued at two	Comment noted
Policy CF1	much to the existing Local Plan policy D.H3, clause 5, which already requires the	we sought to identify existing
Policy CF2	need for clarity about how improvements will be provided. A general discussion	Policy CF2. we are not considering the

Policy CF3	maintenance of community centres should be listed as an 'action' rather than a	Consider changing policy CF3 to
Action CF3:	time.	Comment noted
Local resident	Government has recently introduced new plans in this regard which give local	we do not plan to adopt design
Lcal resident	scope for including other housing measures, to the extent they are available, eg	Most of these suggestions are
Local resident	neighbourhood that feels safe for all residents, particular focus should be made on	Comment noted
Local resident	the school and the community some well thought out space. Ditch all of the stupid	Comment noted
Local resident	industrial buildings and wharf is very welcome, as is the support for the existing	Support for renovation of
	by volunteers. They do not have the time or energy or love of meetings to get into	Comment noted
Local resident	in that building. Action needs to be taken now before it crumbles!	Support for idea of community asset
topics		
LBTH	Corporation (LLDC) that there is a problem with the designated boundary of the	
boundary of plan area	Area as designated by the London Borough of Tower Hamlets on 6 February	
	these areas by Tower Hamlets – designating neighbourhood areas and forums in	
	site allocation in Policy H1 of the neighbourhood plan appears to partly be located	The Forum accepts part of the
actions	as suggested in the Planning Practice Guidance on neighbourhood planning,	Comment noted
	chapters on objectives 4 and 6, the actions are currently interspersed with the	Comment noted
	policies – for example, there is currently a Policy LE1 and an Action LE1, which	Comment noted
Supporting Text and Level	how policies will be applied. At the moment, policies are followed by references to	Need for greater supporting detail for
Developer contributions	contributions. It is useful that the plan recognises that these contributions are a	comment noted

	made a condition of the planning permission and must relate directly to the	comment noted
	development on the basis of the amount of floorspace delivered. This money can	comment noted
	direct developer contributions will be required, particularly on site allocations	Comment noted
The plan and CIL	Tower Hamlets (Isle of Dogs and Spitalfields) have contained sections that set out	Consider setting out the Forum's CIL
	CIL priorities in a single place, although a number of projects can be identified in	Comment noted
References to planning	now date it from 2021, as the final version of the plan was adopted on 2 March	Comment noted
Formatting	be a better choice, as it allows the reader to more easily see what is being	Comment noted
	labelled '2.[x]', there appears to be no reason for the use of prefix '1'. The figures	Comment noted
	pointed lists, but are not showing in this way – for example, sections 2.2.1 and	
Introduction, Context	development' at section 1.4.1. The first paragraph says "if a planning application is made	Comment noted
	once adopted, will represent one part of the development plan...". In figure 1.4, the key	Comment noted
LBTH	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	
(Response to impact of boundary changes)	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	comment noted

	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	comment noted
	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	This understanding is correct
	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.	comment noted
	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 J1 DC, we understand that if	comment noted
	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	comment noted
	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.	comment noted
(see	amount of land directly affected, we are hopeful that a re-run will not be needed,	Noted, but a new consultation was

Local resident	<p>“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</p>	Roman Road Bow' is the formally designated name of the forum and plan area.
	Residents Association Area. It was the Forum which was keen to venture south of	Comment noted
	references to “youth” and 22 references to “child” or “children”, a total of 60	Comment noted
	attracted visitors from across London, but has been in decline in recent years”.	Comment noted
	ensure step-free access at Mile End underground” as this would help those with	Comment noted
	6 PRIORITIES AND BENEFITS IN SHORT, AND SURELY, THE CURRENT DRAFT PLAN FAILS TO REFLECT properly the Neighbourhood Area or its Community.	Comment noted
	neighbourhood that feels safe for all residents, particular focus should be made on	Comment noted
Local resident	Energy explains, too many Local Plans fail to address the enormous changes that	These comments were carefully
Local resident	really impacts the character of the area. I live roughly opposite the old Percy	Comment noted
Local resident	change!	Comment noted
	CHANGES	
England	Neighbourhood Plan poses any likely risk or opportunity in relation to our	comment noted
National Grid	relevant to the boundary change, but a map was sent which showed the	comment noted

LLDC	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	Comment noted
TfL Commercial	designation boundary, amended to exclude TfL's landholding at 'Land between	Comments noted
TfL Planning	have no comments to make on the proposed change but we note that the land	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	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	Comment noted
MP	the COVID-19 situation and is prioritising urgent and emergency cases for	Comment noted
Concerns	We have received your email, thank you!	Comment noted
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	Comment noted, but no Liveable Street measures in Bow had been
Local resident	Neighbourhood Plan for the following reasons:	
	1. I do not believe that the LLDC should have jurisdiction over land to the west of the A12 Blackwall Tunnel road	The LLDC do have authority over

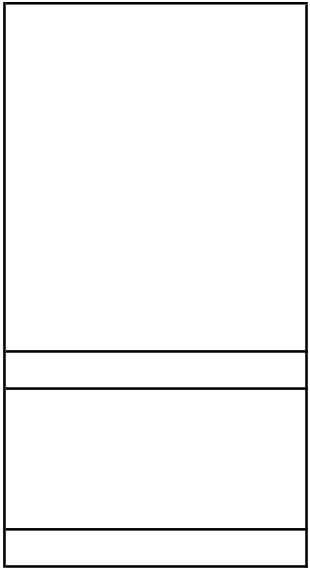
Change to NP (if any)
text in this colour means changes have been added to draft plan
Re-order text, with policies coming first, followed by actions, all with consecutive numbers, so no policies and actions have the same number. Renumber figures, omitting the pre-fix '1'.

Reference London
Plan policy SD6

remove reference to 2015 footfall report report on page 35

omit reference to
shared facilities in
para 4.2.4

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.



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

Include numbers of vacant units

draft policy page 35.
replace figure 1.14
with map on p.56 of
[Tower Hamlets High Streets & Town Centres Strategy 2017 - 2022](#)

include a reference to the different programmes

street clutter, such as
the night sky podiums in

Add to the Fig 1.1.6
heading: 'Improved

Suggested wording
changes accepted

1. High quality cycle
route along Grove Road

Change all references
to 'bicyclo' to 'cyclo'

Have added text

A list of priorities for
CIL funding was

new policy wording from Historic England
Heritage as as a potential source of Adopted policy wording proposed by Historic England and include some of the specific points by way of explanation of the policy
include Culture & Creative Industries
include this evidence in the plan
Revise plan and map to show the correct

Crown removed and
Caterpillar added later in
Driver removed with

mention of the
potential of pubs to

see top of the heritage
section for revised text

Paragraph added about developers
Use site boundary shown in planning application by Place Ltd, PA/21/01162
Link quote from Central Area Good Growth SPD to '21 Century Urban Housing Growth'.

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Need to define community led housing, and mention this needs to be provided by registered affordable housing providers.

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Policy CF3 changed
to action point

Switch 7.4 and 7.5 so
the Bow Wharf policy
Adopt consecutive
numbering for policies

A list of the FORUM'S priorities for CII
Update references to the London Plan 2021
Delete prefix '1' to the figure numbers. Add
Adopt the suggested change to the wording: "It Neighbourhood Plan



Land to the east of Wick Lane proposed as a Local Green Space withdrawn from

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.

The revised site boundaries will be those in the planning application PA/21/01162/A1 submitted in June

