

# Roman Road Bow Neighbourhood Plan

## London Borough of Tower Hamlets Regulation 16 Consultation Response

1. This document forms the response of the London Borough of Tower Hamlets (“the Council”) to the Regulation 16 consultation on the Roman Road Bow Neighbourhood Plan, as prepared by the Roman Road Bow Neighbourhood Forum (“the Forum”). We welcome the opportunity to comment on the neighbourhood plan, and commend the Forum for the effort put into developing the plan to this stage. We intend to work closely with the Forum to help the neighbourhood plan progress through a successful examination and on to a referendum.
2. The response to the Regulation 14 plan was informed by input from a range of teams across the Council, including Infrastructure Planning, Regeneration, Place Shaping, Enterprise, Open Spaces, and Asset Management. We have included their earlier comments where we feel they are still relevant.
3. The Council is generally supportive of the aims and objectives of the neighbourhood plan, and we feel that the plan is written in a way that will support sustainable development in the Roman Road Bow area and appears to generally be in conformity with national policy and guidance and with the strategic policies of the development plan.
4. In order to support the development of the neighbourhood plan, the Council provided a response to the Regulation 14 plan that included a number of recommended changes. We are pleased to see some of those suggestions implemented in the Regulation 16 plan, such as ensuring that CIL spending priorities are included as ‘Actions’ rather than ‘Policies’.
5. Although many comments on different aspects of the neighbourhood plan are provided in this consultation response, and some of these comments challenge aspects of the plan, these comments are provided in the spirit of constructive engagement. It is also important for the Council to ensure that the neighbourhood plan is written in such a way that it can be effectively implemented once it reaches the stage of being adopted as part of the development plan. We hope that the comments provided below will help to achieve this, and we look forward to continuing to work with the Roman Road Bow Neighbourhood Forum to help the neighbourhood plan progress to the next stages of the process.
6. The response will deal with general issues in the first two sections, and then provide comments on the specifics of each chapter of the neighbourhood plan. In the majority of cases, our suggestions are general comments on the policies and actions; where we are suggesting specific changes in wording, these will be in red text.

## General Comments

7. **Supporting Text and Level of Detail:** For several of the Policies and Actions, more detail is required in the supporting text to remove ambiguities and ensure that the Policy or Action can be implemented by decision-makers. These are addressed in more detail for each section below.
8. **Use of Planning Obligations:** One of the most significant comments in the council's response to the Regulation 14 neighbourhood plan was the need for clarity around the use of planning obligations. In most cases this has been addressed, with explicit reference to the use of CIL, and the change of CIL spending recommendations from policies to actions. There are a small number of places in the neighbourhood plan where there is still some ambiguity, and these have been identified below.
9. **Minor Comments:** 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.
10. We have also identified a few minor formatting errors that could be tidied up. 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.
11. The page numbers included in the Table of Contents do not match the page numbers in the document itself.
12. 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. Without the bullet points, these are confusing to read due to the lack of full stops.

## Introduction, Context, Vision

13. We have no comments to make on these chapters, which set out the context of the plan and the work the forum has done in an interesting and engaging way. We support the objectives presented in the Vision. They are in accordance with the objectives of the LBTH's Local Plan and the relevant SPDs.

## Objective 1: Thriving High Street and Local Economy

14. **Policy LE1:** We support the objectives of this policy, but have a few comments around the level of detail.
15. The justification at 4.2.4 references the Leaside AAP. This document is currently in draft form as it undergoes Regulation 18 consultation, so the reference should ensure that 'draft' is included in the title. The wording of the paragraph copied from the draft AAP has changed since this was copied and should be updated – the current draft of the AAP encourages developers to consider the provision of smaller, flexible spaces for creative enterprises and other suitable businesses, but no longer makes this a requirement.
16. It is important for the supporting text to define the uses referred to in the policy. It is not clear in this section what would be considered a maker space, a cultural or leisure activity or a social enterprise.
17. It is also unclear if Policy LE1 applies to the whole of the neighbourhood planning area, to designated town centres within the area, or just to the Roman Road East town centre (which is shown in a plan on the opposite page). Given the town centre first approach of the NPPF, the London Plan and the Local Plan, proposals for cultural and leisure uses and social enterprises are not likely to be supported outside of designated town centres. There may be more flexibility for maker spaces, depending on the nature of the use.
18. The policy should also provide more detail regarding how decision-makers can determine whether proposals are capable of supporting maker space, cultural and leisure activities or social enterprises. The Neighbourhood Forum's consultation statement, in response to the Council's comments on the Regulation 14 plan, referred to the provision of smaller, flexible units. If this is the type of commercial space that is supported, this should be stated explicitly in the policy or the supporting text to ensure clarity for decision-makers.
19. The supporting text could also usefully contain some detail on the specific needs of the social enterprises, if these have been identified – what kind of facilities do these industries need that might not be provided in more conventional employment spaces?
20. While we support the objectives of this policy and encourage the provision of workspace, cultural and leisure facilities and social enterprises in town centres, the policy could be clearer about what it wants to achieve and how to achieve this through planning policy. 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.
21. 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.
22. Figure 14 shows Roman Road East District Centre, but does not show the other designated town centres within the neighbourhood planning area. It would be useful to include a plan showing

all the designated town centre boundaries in the area, unless the policy is only intended to apply to Roman Road East, in which case this should be stated explicitly in the policy.

23. **Action LE2**: 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. 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.
24. **Action LE3**: We are supportive of this proposal and have no further comments on it at this time.
25. **Action LE4**: We are supportive of this proposal, and have no further comments on it at this time.

## Objective 2: Green Streets That Encourage Walking and Cycling

26. **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.
27. We have a number of other suggestions to strengthen the policy further, which are set out below:
- 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).
  - 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.
  - 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.
  - 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.
  - 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.
  - 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. 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, which would add clarity with the accessibility clause and blue badge parking clause labelled 2 and 3.
28. Figure 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.

29. **Action GS2**: We support the objectives of this Action, however, we have two minor comments. 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, part b, is largely a repetition of Clause 6 of Policy GS1, and it is unclear how this relates to school streets.

### Objective 3: Beautiful Public Spaces

30. ***Policy PS1***: 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 an inaccuracy – there are 10 spaces listed in the policy; 10 spaces listed in the key to the map; but while there are 10 sites shown on the map, two of them are numbered 9.
31. ***Policy PS2***: 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.
32. In terms of the sites proposed as Local Green Spaces, while the sites clearly meet the criteria in paragraph 102 of the NPPF of being in close proximity to the community and local in nature, we are not confident that the sites at Daling Way, Lockton Green, Matilda Gardens, and Brodick House, meet the criterion of being demonstrably special. All of these sites appear to consist of amenity land attached to housing estates, and it has not been made clear why they are any more demonstrably special than any other piece of similar land throughout the neighbourhood area or the borough. However, we support the designation of the Holy Trinity Churchyard (special for its historical interest), Trellis Square (special for its recreational and health benefits as a space for urban food growing), and Roman Road Adventure Playground (special for its recreational benefits). At the Regulation 14 consultation, we questioned the inclusion of Wennington Green, due to part of this site already being designated as Metropolitan Open Land. On further consideration, we are now happy to support the designation of this site as Local Green Space, to ensure that the whole of the space is protected.
33. Following the Regulation 14 consultation, some of the proposed Local Green Spaces were removed from the policy, however, these appear not to have been removed from Figure 22 or the numbering of the images opposite.

## Objective 4: New Life for Our Local Heritage

34. **Policy HE1**: We are broadly supportive of this proposal.
35. **Policy HE2**: Following the Regulation 14 consultation, several of the pubs included in the policy were removed. These pubs are still shown in Figure 24, which should be updated.
36. 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.
37. **Action HE3**: We support the underlying goal of this action, and agree that as currently written it is an ‘action’ rather than a policy. However, the action is worded in a way that is overly broad and vague and does not provide any directions for implementation – it identifies a problem, but then simply requests the Council to find a solution, with no suggestions of what might be acceptable to the community of the Roman Road Bow area.
38. **Action HE4**: We are supportive of this proposal, and have no further comments at this time.

## Objective 5: High Quality Affordable Housing

39. **Policy H1**: We support the proposed allocation of this site for housing, however, the policy should include more detail of the scale of development proposed on the site, including an indicative number of dwellings. It could also include a discussion of any constraints on the site, and any design considerations that developers should take into account, having regard to existing design guidance in the Local Plan and other relevant guidance.
40. **Policy H2**: While we support the overall objectives of the policy, there is no definition of 'community-led housing' or 'community-led housing organisation' that is detailed enough for this policy to be implemented unambiguously. The supporting text also refers to housing provided through a community led housing group as 'of true benefit to the local community, a specific group of people (an intentional community), or both'; it is unclear what would constitute a true benefit, or how decision-makers could assess the benefits.
41. **Policy H3**: We support the aims of this policy and have no comments to make at this time.

## Objective 6: Resilient and Well-Networked Community Infrastructure

42. **Policy CF1**: 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 – although I note the caveats on developer contributions and CIL near the beginning of this consultation response. While Mile End Climbing Wall and Roman Road Adventure Playground are identified as locations that could benefit from additional facilities, it may also be helpful to identify additional spaces in the area that would benefit from play equipment.
43. **Action CF2**: We support the general aim of the action, though we have concerns 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 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 should be stated explicitly and referred to a recommended CIL priority. This action is also missing its title.
44. **Action CF3**: We support this Action and appreciate the clarity and the explicit reference to it as a CIL priority.
45. **Action CF4**: 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.
46. **Action CF5**: 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 9.6.1 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 9.6.1 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 again 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. We support the nomination of assets of community value by

members of the community. Given that this action contains two mostly unrelated proposals, we recommend that they be labelled a and b for added clarity.

47. **Action CF6**: We are supportive of this proposal, and have no further comments on it at this time.
  
48. **Section 10: Priorities for CIL Funding**: We support the inclusion of a list directing decision-makers to key actions for CIL funding priorities. Please note for correctness that CIL stands for Community Infrastructure Levy, not Community Interest Levy. This section, although short, could perhaps be made to stand out a little more as a separate section of the plan – currently it blends into the end of section 9, and could perhaps be moved onto the next page, which is currently blank, and given a more prominent heading.