Report on Roman Road Bow Neighbourhood Plan 2021-2031

An Examination undertaken for the London Borough of Tower Hamlets Council with the support of the Roman Road Bow Neighbourhood Forum on the September 2021 submission version of the Plan.

Independent Examiner: Jill Kingaby BSc (Econ) MSc MRTPI

Date of Report: 31 May 2022

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Main Findings - Executive Summary

From my examination of the Roman Road Bow Neighbourhood Plan (the Plan/ RRBNP) and its supporting documentation including the representations made, I have concluded that subject to the policy modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- The Plan has been prepared and submitted for examination by a qualifying body – the Roman Road Bow Neighbourhood Forum;
- The Plan has been prepared for an area properly designated – the area of Bow, London, shown on Figure 2 of the Neighbourhood Plan;
- The Plan specifies the period to which it is to take effect – 2021-31; and
- The policies relate to the development and use of land for a designated neighbourhood area.

I recommend that the Plan, once modified, proceeds to referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

1. Introduction and Background

Roman Road Bow Neighbourhood Plan 2021-2031

1.1 Roman Road Bow is located in the London Borough of Tower Hamlets, east of Central London and north of Docklands. It sits between Globe Town to the west, Victoria Park to the north, Mile End to the south and Fish Island/the Olympic Park to the east. Victoria Park lies just outside the designated Neighbourhood Plan Area's (NPA) northern boundary. Mile End Park, with the Grand Union Canal and Grove Road, is within the western side of the NPA. The A11, a major highway fronted by Mile End and Bow Road tube stations, forms the NPA's southern boundary. The A12, giving access south to the Blackwall Tunnel but limiting movement from west to east, is adjacent but just outside the NPA's eastern boundary. Roman Road, famous for its street market, extends from west to east across the northern part of the NPA. Roman Road street market is a historic feature accommodating long-established family businesses, shops, eating places and public houses, which traditionally shaped the local economy, attracting visitors from across London. In recent times, the number of vacant units along Roman Road has increased and footfall has reduced, although the street market continues to operate and Roman Road East retains its designation as a District Centre in Tower Hamlets'

Local Plan. The southern part of the NPA is crossed from west to east by the Docklands Light Rail service, giving access from Central London to Stratford, the Olympic Park and Docklands.

1.2 The NPA contains many quiet residential streets set back from the major roads and railway lines, as well as from Victoria and Mile End Parks. The Roman Road Bow Neighborhood (*sic*) Planning – Engagement report states that there are approximately 20,000 residents in the NPA. The RRBNP indicates that the population of Bow East and Bow West wards at the time of the 2011 Census was 27,720, with a diverse demographic composition. Some 40-41% of residents, according to the 2011 Census, were Black and Minority Ethnic (BME), with 17-21% of Bangladeshi origin. In Bow West Ward, 33% of households were owner-occupiers, 39% lived in social rented accommodation and 28% in private rented homes. In Bow East Ward, some 27% of households were owner occupiers and 73% lived in social or private rented properties.

1.3 The RRBNP[1] refers to the Tower Hamlets Central Area Good Growth Supplementary Planning Document (SPD). This describes Bow as a location which "generally has a finer grain to the west and a coarser grain to the east, with poorer permeability and legibility in and around post-war estates and more recent developments, and easier movement where Victorian and Georgian terraces are prevalent". At my site visit, I noted the contrast between the Victorian/Georgian terraces and the more modern, usually flatted, residential developments. The NPA includes a significant number of designated conservation areas: Driffield Road, Roman Road Market, Medway, Clinton Road, Tredegar Square and Fairfield Road, as well as parts of Victoria Park Conservation Area. The conservation areas represent places of historic interest, with strong character and appearance.

1.4 A public meeting was held at St Paul's Church, St Stephen's Road, in February 2016 to initiate the neighbourhood planning process. This led to the formation of a steering group designed to identify potential themes for the Plan and consider the extent of the NPA. The RRBNP area was formally designated by the London Borough of Tower Hamlets on 6 February 2017 and the Forum, with responsibility for overseeing development of the Neighbourhood Plan, was designated on 16 August 2017. Evidence gathering and the identification of locally important issues took place over the following two years, and a first skeleton draft Plan was written in late 2019. Despite the COVID-19 pandemic, in 2020, with mainly online communication, the draft Plan was refined, and public consultation carried out in accordance with Regulation 14[2], from 15 March to 25 April 2021.

[1] Roman Road Bow Neighbourhood Plan 2021-31, September 2021, Urban character paragraph 2.1.2.
[2] Neighbourhood Planning (General) Regulations 2012 (as amended).

1.5 During the Regulation 14 consultation period, the London Legacy Development Corporation (LLDC), responsible for planning in the Stratford/Olympic Park area east of Roman Road Bow, pointed out that several small plots of land in the NPA (as initially designated) bordering the A12 road lay within the LLDC area. Tower Hamlets, LLDC and the RRBNP Forum agreed that boundary changes should be made so that the Neighbourhood Plan only included land currently under the remit of the London Borough of Tower Hamlets. The revised boundary was approved by Tower Hamlets' cabinet on 30 June 2021 and a further Regulation 14 consultation exercise on this focused issue was held between 5 July and 15 August 2021. An updated RRBNP with the revised boundary was submitted for examination in September 2021 and is the subject of this examination. Public consultation in accordance with Regulation 16 took place from 6 December 2021 to 7 February 2022, and I take account of the responses to that exercise in my examination.

The Independent Examiner

1.6 As the Plan has now reached the examination stage, I have been appointed as the examiner of the RRBNP by the London Borough of Tower Hamlets, with the agreement of the Roman Road Bow Neighbourhood Forum (the Forum).

1.7 I am a chartered town planner and former government Planning Inspector, with prior experience examining neighbourhood plans in London and elsewhere in England. I am an independent examiner, and do not have an interest in any of the land that may be affected by the draft Plan.

The Scope of the Examination

1.8 As the independent examiner I am required to produce this report and recommend either:

(a) that the neighbourhood plan is submitted to a referendum without changes; or

(b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or

(c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.

1.9 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended)('the 1990 Act'). The examiner must consider:

- Whether the plan meets the Basic Conditions.

- Whether the plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'). These are:
  - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
  - it sets out policies in relation to the development and use of land;
  - it specifies the period during which it has effect;
  - it does not include provisions and policies for 'excluded development'; and
  - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area.
- Whether the referendum boundary should be extended beyond the designated area, should the plan proceed to referendum.
- Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended)('the 2012 Regulations').

1.10 I have considered only matters that fall within Paragraph 8(1)of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

The Basic Conditions

1.11 The 'Basic Conditions' are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:

- Have regard to national policies and advice contained in guidance issued by the Secretary of State;
- Contribute to the achievement of sustainable development;
- Be in general conformity with the strategic policies of the development plan for the area;
- Be compatible with and not breach European Union (EU) obligations (under retained EU law)[3]; and
- Meet prescribed conditions and comply with prescribed matters.

1.12 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the

[3] The existing body of environmental regulation is retained in UK law.

neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.[4]

2. Approach to the Examination

Planning Policy Context

2.1 The Development Plan for this part of the London Borough of Tower Hamlets, not including documents relating to excluded minerals and waste development, is the Tower Hamlets Local Plan 2031, adopted on 15 January 2020, and the London Plan 2021.

2.2 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). The Planning Practice Guidance (PPG) offers guidance on how this policy should be implemented. A revised NPPF was published on 20 July 2021, and all references in this report are to that NPPF and its accompanying PPG.

Submitted Documents

2.3 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including those submitted which comprise:

- the draft RRBNP 2021-2031, September 2021;
- Figure 2 of the Plan which identifies the area to which the proposed Neighbourhood Development Plan relates;
- the Consultation Statement, September 2021;
- the Basic Conditions Statement, September 2021;
- all the representations that have been made in accordance with the Regulation 16 consultation; and
- the Strategic Environmental Assessment (SEA) Screening Report (August 2021) prepared by the London Borough of Tower Hamlets.[5]

2.4 After reading the above submitted documents, on 23 March 2022 I requested answers from the Forum to a number of preliminary questions and, if practicable, a Statement of Common Ground (SoCG) with the London Borough of Tower Hamlets. This SoCG was requested with a view to setting out areas of agreement on potential modifications to the submitted Plan. Following discussions with the London Borough of Tower Hamlets' officers, in April 2022 the Forum submitted a SoCG in which the Forum also responded to my preliminary questions. I take account of

[4] This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

[5] View at: Roman Road Bow (towerhamlets.gov.uk)

these documents in my examination of the Roman Road Bow Neighbourhood Plan.[6]

Site Visit

2.5 I made an unaccompanied site visit to the Neighbourhood Plan Area on 12 April 2022 to familiarise myself with it, and visit relevant sites and areas referenced in the Plan and evidential documents.

Written Representations with or without Public Hearing

2.6 This examination has been dealt with by written representations. I considered hearing sessions to be unnecessary as the consultation responses clearly articulated the objections to the Plan, and presented arguments for and against the Plan's suitability to proceed to a referendum alongside the further answers to my preliminary questions as described above.

Modifications

2.7 Where necessary, I have recommended proposed modifications (**PMs**) to the Roman Road Bow Neighbourhood Plan in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have listed and set out these modifications separately in Appendix 1. The PMs cross refer extensively to the SoCG between the London Borough of Tower Hamlets and the Roman Road Bow Neighbourhood Forum (April 2022), which I have attached for reference as Appendix 2 to my report.

3. Procedural Compliance and Human Rights

Qualifying Body and Neighbourhood Plan Area

3.1 The Neighbourhood Area was designated by the London Borough of Tower Hamlets on 6 February 2017, with approval of a revised boundary on 30 June 2021. The RRBNP has been prepared and submitted for examination by the Roman Road Bow Neighbourhood Forum, which is a qualifying body designated by the London Borough of Tower Hamlets on 16 August 2017.

3.2 It is the only Neighbourhood Plan for Roman Road Bow and does not relate to land outside the designated Neighbourhood Plan Area.

Plan Period

3.3 The Plan specifies clearly the period to which it is to take effect, which is from 2021 to 2031.

[6] See footnote 5 above.

3.4 The first public meeting to consider a neighbourhood plan took place in February 2016 at St Paul's Church, St Stephen's Road. Initiated by the Roman Road Trust, it was publicised through the Trust's newsletter and a network of local groups. It aimed to inform people about the neighbourhood plan process, seek views on the proposed Plan area and elicit ideas about how the area could be improved. A steering group was then formed which met fortnightly, identified potential themes for planning, and considered further the Plan's boundaries. Several further public meetings were then convened to consider the Plan area. Early engagement was established with the Plan Making Team of the London Borough of Tower Hamlets and, following designation of the RRBNP Area, in March 2017 a public meeting was held to discuss a Forum constitution. London Borough of Tower Hamlets organised consultation on the proposed Forum in June-July 2017, and it was designated on 16 August 2017.

3.5 In 2016, the Forum began by engaging with existing local groups to set up a consultation process and shape the content of a future neighbourhood plan. Details of the work undertaken are described in the Roman Road Bow Neighborhood (*sic*) Planning Engagement Report, which forms part of the evidence base for the Plan. In order to avoid the risk of consultation fatigue, and engagement with only a fraction of the diverse demographic in the area, the Forum decided to use Ambassadors to reach into sub-areas of the designated NPA. It was also decided to use the main themes for the future of the area, identified earlier, to give consistency to community engagement. Ambassadors were local residents who represented eight sub-areas; the themes a) to g) were objectives to achieve a "cohesive community built around a flourishing high street", as already discussed with Forum members at its Annual General Meeting (AGM).

3.6 A range of events and activities to engage the public in the development of the Plan were adopted. Questionnaires using online platforms were used to reach residents not engaged with ambassadors, and other measures to engage with harder to reach communities and groups were adopted. For example, a community garden project enabled one-to-one conversations. An architect from the Erasmus for Young Entrepreneurs Programme produced 3D maps, which helped to draw comments and opinions on building and environmental matters. The Consultation Statement for the RRBNP highlights the invaluable help with the overall engagement strategy from Torange Khonsari, then senior lecturer in architecture at Metropolitan University and director of Public Works. One of the imaginative projects to reach less accessible groups was the Community Orchard in Butley Court, which attracted a Bengali group and people over 60 years of age.

3.7 Events were publicised through leafleting as well as personal contacts. A "market barrow" was placed outside event venues on the relevant day to display posters. Workshops at Olga Primary School, market stalls, online

presence through Placecheck, contact with local faith groups, and engagement with the business community (notably through Roman Road Trust), were undertaken so that all with an interest in Roman Road Bow were given the opportunity for involvement. A student team from nearby Queen Mary College carried out a survey of 50 local businesses to explore potential for greater flexibility in the use of business premises in advance of the Government's change in planning use classes in 2020.[7] This project helped raise awareness among local businesses of the forthcoming RRBNP. 54 students attending Morpeth secondary school responded to a survey in July 2016, with responses from students of diverse ethnic backgrounds (63% were Asian). It provided useful information for neighbourhood planning and highlighted the desire for more or better youth leisure facilities. The findings from all the initiatives on the different themes were shared at a workshop in April 2019, which took place alongside the Forum's AGM.

3.8 A "first skeleton draft plan" was written late in 2019. The COVID-19 pandemic ended in-person public engagement in March 2020, and the Forum relied mainly on online communication. The Forum's AGM in 2020 was held online, at which the main themes of the draft Neighbourhood Plan were presented. Three further online sessions were offered for people to hear about and comment on the draft Plan, but these were not taken up. Regulation 14 consultation on the Plan took place from 15 March to 25 April 2021. Although all responses were received online, some 1,000 consultation newsletters had been distributed to local residents, businesses and groups across the NPA. The consultation exercise was publicised through local social media including the Forum newsletter (sent to 200 addresses), and the local press. A further focused Regulation 14 consultation exercise was held from 5 July to 25 August on the impact of boundary changes to the NPA. The Consultation Statement provides a summary of the main issues raised by respondents at the Regulation 14 consultation stage and how these were addressed, prior to production of the revised, submission version of the RRBNP. The summary of responses received to the Regulation 14 exercise, published in September 2021, indicates that about 300 comments were made on the Plan and the proposed boundary changes. Representations were made by the London Borough of Tower Hamlets, LLDC, Greater London Authority (GLA), Transport for London (TFL) – Commercial Development and Planning, Historic England, Environment Agency, Natural England, Sport England, Thames Water, National Grid, Canal & River Trust, the Coal Authority, a local Member of Parliament, local businesses and organisations, as well as local residents.

3.9 Regulation 16 Consultation on the RRBNP took place between 6 December 2021 and 7 February 2022. Responses were received from 28 individuals and organisations. I am satisfied that the consultation process was

[7] The use classes were updated from 1 September 2020 through the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020.

sufficiently robust and wide-ranging and has met the legal requirements i.e. procedural compliance. Regard has been had to the advice in the PPG on plan preparation and engagement.

Development and Use of Land, and Excluded Development

3.10 The Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act.

3.11 In addition to the RRBNP policies which I am required to consider against the statutory tests, the Plan identifies (in yellow 'Action' boxes), issues of importance to the local community but which are not land use matters to be addressed in the RRBNP. They relate to measures which may be sought in order to improve the general quality of life and well-being within the NPA, rather than land use issues which relate to the development and use of land in the statutory and policy sense.

3.12 The matters identified as actions correspond to the objectives of the RRBNP and, although I have taken note of these, they will not form part of the statutory Development Plan for the area and are not considered against the Basic Conditions. [8] Therefore they do not form part of my assessment and report.

3.13 The SoCG contains a number of suggested alterations to these actions. These alterations to actions can be made consequential to the recommended modifications, alongside any other minor non-material changes or updates, in agreement between the Forum and London Borough of Tower Hamlets.[9] I refer further to these actions in paragraph 4.37 below in the interests of completeness.

3.14 The Plan does not include provisions and policies for 'excluded development'.

Human Rights

3.15 The Basic Conditions Statement states, in paragraph 5.4, that the Plan does not breach and is not otherwise incompatible with the European Convention on Human Rights. London Borough of Tower Hamlets has not contended otherwise. Concerning the RRBNP and human rights, (within the meaning of the Human Rights Act 1998), from my reading of the Plan and evidence submitted, I see no reason to disagree with the Forum's findings.

[8] PPG Reference ID: 41-004-20190509.
[9] PPG Reference ID: 41-106-20190509.

4. Compliance with the Basic Conditions

EU Obligations

4.1 The Regulation 14 consultation draft Neighbourhood Plan was screened for Strategic Environmental Assessment (SEA) by London Borough of Tower Hamlets, which found that it was unnecessary to undertake SEA. Following analysis of the Regulation 14 consultation responses, minor amendments were made to the Plan, including policy support for low carbon homes. This would only apply to refurbishments and would bring the RRBNP into closer alignment with Tower Hamlets Local Plan. Responses to the Regulation 16 consultation exercise from the London Borough of Tower Hamlets, the Environment Agency, Natural England, Historic England and other parties did not contend that SEA should be undertaken. Having read the Strategic Environmental Assessment Screening Report and consultation responses, I support this conclusion.

4.2 The RRBNP was further screened for Habitats Regulations Assessment (HRA), as described in the Strategic Environmental Assessment and Habitats Regulation Screening Report – Statement of Reasons. It concluded that the draft Regulation 14 version of the Plan would not have any significant additional impact, either individually or cumulatively with other plans and programmes, than the Tower Hamlets Local Plan. Appropriate Assessment (Stage 2) was therefore not necessary. Based on my own independent assessment, I agree with this conclusion.

Main Issues

4.3 I have approached the assessment of compliance with the Basic Conditions of the RRBNP as two main matters:

- General issues of compliance of the Plan, as a whole; and
- Specific issues of compliance of the Plan policies.

General Issues of Compliance

4.4 In general, I do not comment on matters of punctuation, spelling and formatting, and am happy for the Forum to correct any such errors, including ensuring that the table of contents and page numbers correspond, once all recommended modifications have been made. However, I do recommend that the front of the Plan is modified to refer to Roman Road Bow Neighbourhood (not Neighborhood) Plan, to ensure consistency with the text in the body of the Plan. One respondent to the Regulation 16 consultation exercise proposed changing the name of the Plan to "Old Ford Bow", but that is a minority view, and I see no basis to recommend it. Also, for reasons relating to accuracy, I recommend that references to the London Plan, as in paragraphs 1.4, 1.4.2, 4.2.3, 4.3.3, 7.3.3, and 8.2.3, should be modified to refer to the current adopted London Plan 2021. In my preliminary letter to the Forum, dated 23 March 2022, I requested revisions to the maps – Figure 2. showing the RRBNP Area boundary; Figure 4. Housing developments; and the map

showing Heritage - Conservation Areas in Bow, on Page 59. In response, the Forum provided modified maps which give greater clarity for readers and users of the Plan, and which I recommend as replacements. **PM1** should be made (i) to secure these modifications, having regard for paragraph 16d) of the NPPF[10], and (ii) to achieve general conformity with strategic policy in the Development Plan.

4.5 Following the Contents pages, I consider that the List of Policies and the Welcome from the Forum's Chair provide a helpful starting-point for readers of the Plan. Then, the Introduction describes the Plan's principal purpose, to guide development within the NPA, and to provide guidance for those wishing to submit a planning application for development there. Paragraph 1.2 – Structure of the plan - refers to a Vision and six Objectives for Roman Road, which are described in full on Pages 28-30. Paragraph 1.2 informs readers that each objective is the subject of subsequent chapters, which include planning policies (in green boxes) and related aspirations and actions (in yellow boxes). Paragraph 1.3 describes the key stages of plan preparation, beginning with formation of the Neighbourhood Forum in February 2016, and paragraph 1.4 addresses the wider planning policy context. Each chapter which sets out the RRBNP policies includes references to the Development Plan strategic policies or national policy, with which the Roman Road Bow NP is in general conformity or has had regard to. Paragraph 1.5 commits to future monitoring of the Plan to ensure its relevance and to monitor delivery. Paragraph 1.6 includes Fig. 2 and briefly describes the NPA boundary. I consider that Chapter 1: Introduction provides a clear and succinct start to the Plan, which is consistent with national planning policy and should help readers to negotiate the Plan.

4.6 Chapter 2 provides a brief history of economic, physical and social development in Bow, with a profile of today's community, based on data from the 2011 Census. Based on consultations with the local communities, paragraph 2.3 describes perceived Opportunities and Challenges for the NPA, illustrated with a number of relevant photographs eg. Fig. 9 shows Traffic congestion on Roman Road. Chapter 3, Pages 28-31, describes the Vision and Objectives for the NPA, which appear to me to suitably reflect the local communities' land use aspirations. Chapter 3 usefully summarises the proposed policies and actions related to each of the six objectives. Chapters 4 – 9 consider each objective in detail, and I comment on all the proposed policies below. Chapter 10 sets out the Forum's priorities for Community Infrastructure Levy funding (CIL). Overall, and as long as **PM1** is made, I conclude that the RRBNP has a clear structure with contents which satisfy the Basic Conditions for Neighbourhood Planning.

[10] Paragraph 16d) of the NPPF states that Plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.

Specific Issues of Compliance of the Plan Policies

Objective 1: Thriving High Street and Local Economy

4.7 Chapter 4 explains that shop units on Roman Road are under-occupied and the objective is to provide a broader range of uses and activities in future, with fewer vacancies and an offer which reflects the range of different needs of the population. I note the concern expressed in Regulation 16 responses by some (but not all) residents about the retail offer, including a perceived need for more "decent shops". I consider that the Plan objective in principle aligns with the NPPF, as updated in July 2021, notably paragraph 86, which expects planning policies and decisions to support town centres at the heart of local communities, and to take a positive approach to their growth, management and adaptation. In response to my preliminary questions, the SoCG proposed new supporting text to Objective 1 to explain the town centre hierarchy within the NPA, with a new map to illustrate that the NPA includes the Roman Road East District Centre, the Mile End Neighbourhood Centre and Bow Road Neighbourhood Parade. Also proposed is a modification to Page 34, Policy S.TC1, Supporting the network and hierarchy of centres. New additional text following Local Plan Policy D.TC7 Markets is also put forward in the SoCG, to explain the challenges faced by Roman Road Market and the future role for the Roman Road Market Action Plan. I support these modifications, which are set out in **PM2**, with an additional reference to Roman Road East's designation as a District Centre on Page 20, paragraph 2.3.1 – Opportunities for the local economy. **PM2** should be made so that regard is had for national planning policy, for general conformity with strategic policy in the Development Plan, and for the achievement of sustainable development.

4.8 London Borough of Tower Hamlets queried whether Policy LE1: Encouraging flexible use of premises relates to the whole Neighbourhood Plan Area, designated town centres or just the Roman Road East District Centre. There are buildings in use for business, cultural or leisure uses across the NPA, such as the Bow House business centre, and I consider that the policy should not be limited in application only to town centres. Policy LE1 refers to the recently introduced Use Class E[11], indicating that regard has been had for latest national planning policy. However, the policy refers to "maker spaces, cultural or leisure activities and social enterprises" which, in my opinion, provides insufficient information as to what would or would not be regarded as acceptable development. In the SoCG, the Forum proposed additional text to Page 33 which would include cross-references to the Use Classes Order. I consider that this new text should be included, as in proposed modification **PM2**, for the achievement of sustainable development.

4.9 London Borough of Tower Hamlets Borough pointed out that the Leaside Area Action Plan (AAP), referenced in paragraph 4.2.4 - Justification for

[11] See footnote 7 above.

Policy LE1, is at draft stage only, and its Policy LS6 has recently been updated. Policy LS6, in the Regulation 18 Consultation Version of the AAP, November 2021, expects major developments providing E-class light industrial and research and development, B class or sui generis employment floorspace, to consider the provision of some floorspace as flexible, smaller units of between 25 – 50 sqm, which would be suitable for micro-businesses and start-ups. Therefore, the policy supports the provision of smaller, flexible units, including on the ground floor of residential-led developments, but does not stipulate that 10% of floorspace must be provided for flexible, smaller units. Having regard to the advice in the PPG[12], paragraph 4.2.4 of the RRBNP should in my view be modified as in **PM3** to acknowledge that the Leaside AAP is a draft plan and to provide text which reflects the Regulation 18 Consultation Version.

4.10 Providing **PMs 2 & 3** are made, I conclude that Chapter 4, addressing Objective 1, meets the Basic Conditions for neighbourhood planning.

Objective 2: Green Streets that Encourage Walking and Cycling

4.11 Chapter 5 sets out the objective for a high quality network of pedestrian and cycle connections, with reduced traffic volumes and associated air pollution and parking issues; assisted by funding through the Liveable Neighbourhood schemes. Policy GS1 requires developments to enhance the pedestrian and cycling experience by way of nine measures. The London Borough of Tower Hamlets expressed its very strong support for the aims of the policy, but argued that the policy needs to be clearer as to how the policy would be applied; in particular, how developer contributions would be used to implement improvements – direct developer S106 or S278 contributions, or CIL.

4.12 The Regulation 16 consultation responses indicated widespread support for greener, safer streets. The difficulties of walking around the area with children or allowing children to cycle on the streets were mentioned. One cyclist described most roads in the NPA as unsafe compared with other parts of London, and proposed additional cycle lanes or traffic calming, particularly on Parnell Road. Conflicts between pedestrians and cyclists, for example on canal towpaths, and the growing popularity of electric scooters and skateboards which can move at speed and present a hazard for pedestrians was referenced. Cars are seen to be given too much priority, with regular queues of cars up the roads and at junctions, emitting noxious fumes which discourage walking and cycling. Support for more trees, greenery, seating, less clutter and litter, and more public conveniences is expressed, to make the streets more inviting for pedestrians. The consultation responses indicate a range of views on many other transport matters including access for black taxis, pedestrian crossing facilities at traffic lights, improvements for bus travellers, and opposition to conversion of the Old Ford Road/Crown Close bridge for pedestrians and cyclists to an all-vehicle bridge. Many of these detailed

[12] PPG Reference ID: 41-009-20190509.

points fall outside the statutory remit of the RRBNP, which only concerns land use planning matters.

4.13 I recognise the challenges for the NPA in promoting safe and green transport in this part of London with the high levels of through traffic. In response to my preliminary questions, as to whether the RRBNP could describe the transport system and context of the area better, the Forum put forward in the SoCG additional text to paragraph 5.1 to describe the existing infrastructure/networks and traffic conditions more fully, with reference to the TfL funded Liveable Streets Bow programme. I support this proposed new wording, which should contribute to the achievement of sustainable development. I commend the Forum for positively seeking to reduce traffic levels on its main roads and improve pedestrian and cycling routes through the built-up area, as well as enhancing services for bus passengers (clause 9 of Policy GS1). The SoCG puts forward a number of additional modifications to paragraph 5.1: Summary of current issues: (a) to explain why specific roads are named in clause 2 of Policy GS1, (b) to advise that CIL will be the principal source of funding for improvements; and (c) to provide additional information about street clutter. These modifications clarify the effectiveness of Policy GS1 and have regard for paragraph 16d) of the NPPF.

4.14 The SoCG also proposes modifications to the start of Policy GS1 to state that the policy relates to major development, and to clauses 7 and 8 to name the Green Grid and specific road junctions where safe crossings are needed. A new sentence after clause 9 would commit to joint working with Newham Borough Council (and the LLDC to 2025) to implement the policy, which I consider to be necessary as the Plan seeks improved accessibility to the Olympic Park. In addition, the clauses in Policy GS1 should be renamed as a-i, instead of 1-9. Figure 16 should show St Stephen's Road, as this is referred to as a key route to and from Roman Road in Policy GS1. I recommend that paragraph 5.1, Policy GS1 and Figure 16 be modified as proposed in the SoCG, and in **PM4**, for the achievement of sustainable development.

4.15 I note the comment in the SoCG regarding a link from Polydamas Close and Four Seasons Green at the end of Malmesbury Road, which was suggested by a respondent to the Regulation 16 consultation, to improve connectivity for neighbourhoods, and give better accessibility notably for school and nursery age children. However, Tower Hamlets Regeneration Team stated that the scheme would not be viable and I propose no modification to the RRBNP on this point.

4.16 Providing that **PM4** is made, I conclude that Chapter 5 meets the Basic Conditions.

Objective 3: Beautiful Public Spaces

4.17 The opening paragraphs to Chapter 6 explain the difficulty for the NPA of maintaining public open space in an intensively developed urban area with

a growing population. The ambitions for 2031, to transform the public realm and secure popular play areas, especially on local housing estates, as well as a litter free environment, are clearly stated. I consider that, in principle, Policy PS1: Enhancing public realm spaces, which identifies 10 locations for improved provision, and is supported by evidence named in paragraphs 6.2.3 & 6.2.4, should contribute to sustainable development within the NPA. I agree with the Forum that the improvement works for each space will need to be site-specific and that the policy should not be too prescriptive. The Forum, in response to representations from the Canal and River Trust and another respondent, agreed to modify Policy PS1 so that it would support improvements beyond the named locations. A reference to Mile End Park should also be added, in view of its size and significance. In order to promote sustainable development across the NPA, I recommend modification of the wording to Policy PS1, as in **PM5.** Figure 21 helpfully illustrates the location of the 10 public realm spaces, but includes an error regarding "Corner of Bow Road and Alfred Street". As proposed in the SoCG, Figure 21 should be modified to show this site as 10 rather than 9. I recommend this correction[13] as in **PM5.**

4.18 Policy PS2: Designating Local Green Spaces should meet the criteria in the NPPF, and only be used where a site is a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance; and c) local in character and not an extensive tract of land.[14] London Borough of Tower Hamlets queried whether Daling Way, Lockton Green, Matilda Gardens and Brodick House were demonstrably special, all being amenity land attached to housing estates. From my site visit and having read the evidence document, "Potential sites for improved spaces for play and recreation", I accept the Forum's assessment that these green spaces are "precious green oases in a borough where intensification and high density living is the order of the day". Daling Way, Locton Green and Brodick House are close to residential tower blocks with limited green space. None of the proposed Local Green Spaces are extensive tracts of land or distant from the community they serve and are, in my view, capable of enduring beyond the end of the Plan period. In the SoCG, the Forum provides evidence that policies in the Tower Hamlets Local Plan would require major developments close to the Local Green Spaces to contribute to their maintenance and enhancement. No modification of Policy PS2 is necessary to meet the Basic Conditions.

4.19 However, I consider that Figure 22 could confuse readers as to the location of the Local Green Spaces and undermine the application of Policy PS2. Local Green Spaces, named in Policy PS2, need to be distinguished from the other "publicly accessible open spaces", and a revised key should be provided to state the difference. **PM6** should be made to modify

[13] Modifications for the purpose of correcting errors is provided for in Paragraph 10(3)(e) of Schedule 4B to the 1990 Act.
[14] NPPF, paragraph 102. Furthermore, Local Green Spaces should be capable of enduring beyond the end of the plan period (paragraph 101).

Figure 22 and for the achievement of sustainable development. I conclude that, with **PM5 & PM6** in place, Chapter 6 will meet the Basic Conditions.

Objective 4: New Life for our Local Heritage

4.20 Chapter 7 includes Policy HE1: Bow Wharf waterway infrastructure conservation and enhancement, and Policy HE2: Public houses to become locally designated heritage assets. The introduction to the chapter informs readers that the NPA includes 7 designated conservation areas although many of the heritage assets in the area are under-valued and in need of improvement and better care. The map on Page 59 titled Heritage, in my view, is difficult to read, and a new map showing Conservation Areas has been put forward as a replacement by London Borough of Tower Hamlets. I recommend that the revised map be substituted, as proposed in **PM1,** to help readers and users of the Plan understand where the Conservation Areas, of heritage importance, are located, and to demonstrate general conformity with strategic policies.

4.21 The Canal & River Trust questioned whether there was any evidence to support the suggestion in paragraph 7.2.1 of the RRBNP that regeneration at Bow Wharf had weakened the visual link between Victoria Park and Mile End Park. Paragraph 7.2.4 quotes from a study by Friends of Regents Canal, October 2013, which references the small scale of buildings and a link both visual and ecological between the public parks to the north and south of Bow Wharf. The last paragraph in 7.2.4 describes the replacement of the wharf cottages with three taller buildings in 2018 which, in my opinion, justifies the last sentence in 7.2.1. The Canal & River Trust pointed out that any plans for the site would be subject to Policy D.EMP2 of Tower Hamlets Local Plan, which requires 10% affordable workspace within major commercial and mixed use developments. The SoCG includes modified wording for the last paragraph to state that affordable workspaces for small businesses should be provided in line with the Local Plan. I consider that, with this amendment, the policy would not be too onerous, especially if small development proposals were brought forward. I recommend that Policy HE1 is modified as in **PM7**, so that it is in general conformity with strategic policies.

4.22 MMO Marine Planning and Marine Licensing requested reference to its South East Marine Plan, and the SoCG proposed new wording in 7.2.4 to refer to its Policy SE-HER-1. I consider that this modification, as in **PM7**, should be made to contribute to the achievement of sustainable development.

4.23 The London Borough of Tower Hamlets observed that all the named public houses (PHs) in Policy HE2: Public houses to become locally designated heritage assets, are located within conservation areas, where significant weight is already given to their protection and enhancement. Hence, the Council does not usually designate locally listed buildings in conservation

areas, as this gives no extra protection. However, the Council recognises that the local community of Roman Road Bow wishes to emphasise the importance of these named buildings and makes no objection to them being identified. I agree that Policy HE2 should be retained as written. However, the Council pointed out that there is a discrepancy between Policy HE2, which names five PHs, and Figure 24, which shows many more. I consider that Figure 24 should be modified to distinguish the five PHs, subject to Policy HE2, from the others, to ensure that the decision-makers react to development proposals appropriately, having regard for paragraph 16d) of the NPPF. **PM7** would secure this modification.

4.24 The London Borough of Tower Hamlets consider Paragraph 7.4.1 as critical of current planning policies, describing them as discouraging innovation in new forms of public house, and restrictive of locations where they might be sited. Policy D.TC5 of Tower Hamlets Local Plan expects drinking establishments to be located in District Centres or Neighbourhood Centres; and will only support their development outside town centre boundaries where the establishments are local in nature and scale. I note that Policy D.TC5 is consistent with national planning policy to promote the vitality and viability of town centres. I recognise that PHs can sometimes cause a nuisance, noting the comments made in consultation responses about problems for residents in Roman Road in the past from PHs there and "the night-time economy". It seems to me that harm to the amenity of neighbours could potentially be more severe in quiet residential areas than in the District Centre of Roman Road East. As pointed out in the Regulation 16 responses, a significant number of local residents avoid alcohol for religious reasons and could see the growth of PHs for community interaction as a divisive factor. The potential problems associated with the growth of public houses should be spelt out in the Plan, with additional text, as I propose in **PM8**.

4.25 With regard to detail as to the meaning of gastro pubs, micro pubs etc, I accept that some additional detail could assist future decision making. I therefore recommend that paragraph 7.4.1 should be modified, as in **PM8**, having regard for national planning policy and for the achievement of sustainable development.

4.26 Provided **PMs 1, 7 & 8** are made, Chapter 7 will meet the Basic Conditions.

Objective 5: High Quality Affordable Housing

4.27 Chapter 8 begins with an objective to promote new developments which integrate well with existing communities, mostly providing low carbon homes with a few affordable and well-designed community-led schemes. Small scale schemes are sought, which will create a greater variety of house types and reflect the local housing need. The Tower Hamlets Local Plan allocates only two sites for housing in the Central Area of the Borough, but neither is located within the RRBNP area. Assessment of potential smaller sites for future development was carried out and

described in the Roman Road Site Options and Assessments 2020 report by AECOM. Detailed information is given for 8 sites, and the findings ruled out only one site (marking it red). Six sites were identified as potentially suitable and available (amber), and one site at the rear of Brymay Close, Wrexham Road was marked green.

4.28 One of the amber sites, Land at the rear of 81-147 Candy Street, is proposed for allocation in Policy H1 of the Plan, and the policy refers to an outstanding planning application. In its Regulation 16 response, London Borough of Tower Hamlets expressed support for the proposed allocation but requested additional information as to what is sought there. In the SoCG, the Forum advised that the planning application was approved in December 2021 for 16 pre-constructed modular apartments, to be used as temporary accommodation for 10 years. The Forum stated that, as the temporary accommodation was for 10 years, it considered it unnecessary to provide more detail at this time. However, the Council disagreed, quoting the time period for the Plan as a reason to provide detail regarding future permanent development.

4.29 I understand the difficulty of providing precise numbers for a future permanent housing scheme on the site, or for setting out specific design principles. Nevertheless, in order to secure a permanent development of high quality, which meets local needs and respects its surroundings, I propose additional text for Policy H1 and paragraph 8.2.1, as in **PM9**. An earlier application was made for 45 dwellings on the site, but the application was undetermined and subsequently expired. 45 dwellings would be within the range of 16-60 dwellings estimated as possible for the site in the Site Options and Assessments Report (based on densities of 45 – 170 dwellings per hectare). The Report cautions that precise density and numbers cannot be specified, as local character and design features will vary from site to site. The additional text in paragraph 8.2.2, in my view, should refer briefly to site constraints, as described in the Site Options and Assessments Report. The modification is needed for the achievement of sustainable development and for general conformity with housing policy in the Tower Hamlets Local Plan (Policy S.H1).

4.30 Transport for London Commercial Development referred to the site in Paton Close, one of the 8 sites considered for housing allocation in the Site Options and Assessment report by AECOM in December 2020. It was given an amber rating, as potentially suitable for development once availability has been confirmed. TfL Commercial Development confirmed that it was engaged with Optivo, housing provider, to develop the site, and argued that it should be allocated within Policy H1. I recognise the difficulty for the Forum in submitting an up-to-date Plan, which reflects the latest situation regarding proposed small housing sites. I shall not recommend that the Paton Close site is allocated in Policy H1 but agree to TfL Commercial Development's suggestion that "At the very least, the development potential of the site should be reflected in the Neighbourhood Plan". I propose that Policy H1 is modified so that it encourages new development on small, infill sites which are demonstrably

suitable, such as the Paton Close site. Policy H1 should contribute towards meeting local housing needs in Tower Hamlets where, as paragraph 8.3.4 states, "the level of housing need far outstrips supply". In proposing this modification, I have also had regard for Policy H2 of the London Plan, which states that Boroughs should pro-actively support small sites, of less than 0.25 hectares, to significantly increase their contribution to meeting housing needs. **PM9** should be made to secure this modification, to be in general conformity with the London Plan and to contribute to the achievement of sustainable development.

4.31 Whilst supporting Policy H2: Community-led housing, the London Borough of Tower Hamlets noted the absence of a definition as to what community-led housing means and how benefits to the community would be assessed. The policy justification provides useful additional information, including a cross-reference to the Roman Road Bow Housing Need and Deliverability Assessment, but I agree with the Council that a definition should be provided in the Plan. The SoCG proposes additional text to paragraph 8.3.2, at the start of Policy H2 to define community-led housing, which provides a step forward. However, I have put forward additional changes, to clarify the definition. **PM10** should be made, so that the meaning and benefit of community-led housing is understandable for users of the Plan, and regard is had for paragraph 16d) of the NPPF.

4.32 Policy H3: Low carbon housing supports the London Borough of Tower Hamlet's ambitions for a zero carbon borough, encouraging the renovation of residential properties to reduce carbon dioxide emissions. The policy, which should contribute to the achievement of sustainable development and is in general conformity with the Local Plan's Policy D.ES7, should be taken forward. I consider that Thames Water's concern about the impact of new development on water and waste water demand and infrastructure, is addressed by the reference to the Free Thames Water pre-planning service on Page 71 of the Plan. I have had regard for the response to the Regulation 16 consultation exercise which drew attention to flood risk in Bow, stating that a huge part of London will be underwater by 2050 (results of new research by Climate Central, a US-based news organisation). Policy D.ES4 Flood Risk, in Tower Hamlets Local Plan, cautions against development in flood zones 2 and 3a, but the Borough map (Figure 15 – Flood zones) indicates that the RRBNP area is not in a medium or high risk zone. Thames Water and The Canal & River Trust provided comments on the RRBNP but did not refer to flood risk over the Plan period, to 2031. I appreciate that enhanced flood risk stemming from climate change is not a matter to be dismissed lightly but consider that there are insufficient grounds relating to future flood risk in the NPA to modify the current Plan. I conclude that, with **PMs 9** & **10** in place, Chapter 8 will meet the Basic Conditions.

Objective 6: Resilient and Well-Networked Community Infrastructure

4.33 Policy CF1: Developing new and improved sports and play facilities addresses an important matter for the NPA, as paragraph 9.2.4 explains. It is suggested that Roman Road Bow is one of the few areas within Tower Hamlets having poor access to public and dual use sports' halls. The London Borough of Tower Hamlets questioned whether Policy CF1 added much to the existing Local Plan Policy D.H3, and suggested that it would be helpful to identify additional spaces in the NPA that would benefit from new and improved sport and play facilities. The SoCG put forward some new text for Policy CF1, to name five locations where improved play provision would be strongly supported. I recommend that this new text is added to the policy, and also recommend that the third sentence in CF1 should refer to "New major residential developments ", so that minor proposals for housing development or alterations are not subject to unrealistic requirements, in conflict with national planning policy. **PM11** should be made to modify Policy CF1, to strengthen the policy and contribute to sustainable development.

4.34 I have considered the argument that the needs of the under-16 population, referenced in Policy CF1, should be assessed in terms of gender, ethnicity and other "relevant protected" characteristics. However, Policy CF1 does not prohibit such assessments, and the needs may differ from case to case. Therefore, I find it unnecessary for the RRBNP to set out the detail of how future need assessments should be carried out. Policy CF1 indicates that CIL funding could be used for additional sports and play facilities. Although the London Borough of Tower Hamlets indicated in its Regulation 16 response that CIL spending priorities should be included in actions rather than policies, I am content that the reference to CIL in Policy CF1 is not in breach of the Basic Conditions.

4.35 Providing **PM11** is made, Chapter 9 will satisfy the Basic Conditions.

4.36 The London Borough of Tower Hamlets proposed that Chapter 10: Priorities for CIL Funding, though short, should stand out a little more. I agree in the interests of clarity that this important topic should have more prominence and be placed on a separate page from Chapter 9, with a yellow heading. The wording should be modified to clarify that CIL means Community Infrastructure Levy, as set out in the SoCG. **PM12** should be made to achieve sustainable development.

Non Land Use Actions

4.37 As noted in para 3.11-3.13 above, the Plan contains a number of actions which are not within the scope of the statutory examination of land use planning matters. A number of representors commented on these actions and suggested revisions have been set out in the SoCG in relation to Actions GS2; HE3; and CF2-CF5. How best to update and revise these to appropriately reflect any comments made is a matter for the London

Borough of Tower Hamlets and the Forum to determine/agree in the next iteration of the Plan, following the examination.

5. Conclusions

Summary

5.1 The RRBNP has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard for all the responses made following consultation on the Neighbourhood Plan, and the evidence documents submitted with it.

5.2 I have made recommendations to modify a number of policies, maps and text to ensure the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendum.

The Referendum and its Area

5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. The RRBNP as modified has no policy or proposals which I consider significant enough to have an impact beyond the designated Neighbourhood Plan boundary, requiring the referendum to extend to areas beyond the Plan boundary. I recommend that the boundary for the purposes of any future referendum on the Plan should be the boundary of the designated Neighbourhood Plan Area.

Overview

5.4 I appreciate that the Neighbourhood Forum has been working hard to produce this Neighbourhood Plan for more than six years, over a time period which has included the COVID-19 pandemic with its restrictions on travel, engagement and face-to-face contact. I congratulate the Forum on producing its Plan and submitting it for examination in late 2021. Roman Road Bow is a complex area, with a fascinating history and heritage, proximity to the vibrant and rapidly changing centre of London, a diverse population living in an intensively developed area, and a unique economy with a range of businesses including the famous Roman Road market. Given the area's complexity, I am impressed that the submitted Plan is so concise. I found it a very readable document with a robust structure, based on a clear vision and six related objectives. The policies, which are appropriately separated from possible actions, are justified with reference to policies from the London Plan and Tower Hamlets Local Plan, as well as other relevant evidential documents. I consider that this structure helps readers and users of the Plan to understand the rationale

behind the objectives and policies. Importantly, it should help decision-makers to reach decisions on planning proposals for Roman Road Bow which are beneficial to the area's future development and help realise the vision for 'step-by-step improvements led by the community for a neighbourhood where everyone feels they belong'.

Jill Kingaby

Examiner

Appendix 1: Modifications

Note: Additions and revisions are shown in ***bold italics*** and deletions using ~~strikethrough~~.

Proposed modification number (PM)	Page no./ other reference	Modification
PM1	Pages Front cover, 10, 12 & others	Front cover: Roman Road Bow Neighbo***u***rhood Plan 2021-2031 Refer to the up-to-date "London Plan ~~2020~~ ***2021***" in paras. 1.4, 1.4.2, 4.2.3, 4.3.3, 7.3.3, 8.2.3, and elsewhere. Replace Fig.2 Roman Road Neighbourhood Plan Area boundary; Fig. 4: Housing developments in Bow 2000-15; and Heritage map on Page 59, with modified plans submitted for examination with the SoCG in April 2022.
PM2	Pages 20, 32, 33 & 34	2.3.1 The local economy Opportunities - Insert the following, after the first sentence: ***Roman Road East, as a designated District Centre, should be promoted as a vibrant hub containing a wide range of shops, services and employment. The Mile End Neighbourhood Centre and the Bow Road Neighbourhood Parade are also protected by designation within the town centre hierarchy.*** Fig.14 – replace with the new map entitled Roman Road Bow Town Centres, submitted with the SoCG. Paragraph 4.2.1 Key issue New sentence at the end: ***In the following policy we define different spaces and activities as follows:*** • ***Maker space: location where***

		people gather to co-create, share resources and knowledge, work on projects, network, and build; includes Class E(g) uses. • ***Cultural activity: an activity which embodies or conveys cultural expression, irrespective of its commercial value; includes theatres, cinemas, Class F1(b) uses and some Class E(a) uses where the focus of the business is on cultural expression, eg. a commercial art gallery.*** • ***Social enterprise; a business which combines a social purpose with financial goals.*** • ***Leisure activity: an activity chosen for pleasure, relaxation, or other emotional satisfaction; may include sports facilities, dance and other exercise studios, community meeting spaces.*** **Tower Hamlets Local Plan 2031, Policy S.TC1, Supporting the network and hierarchy of centres**. Insert a new opening sentence: ***The plan area contains the Roman Road East District Centre, the Mile End Neighbourhood Centre, and the Bow Road Neighbourhood Parade.*** **Tower Hamlets Local Plan 2031, Policy D.TC7 Markets** After this section and before **Planning Obligations SPD March 2021**, insert: ***Roman Road Market. The market has struggled in recent years to adapt to the changing composition and shopping habits of the local community. Policy D.TC7 Markets (Page 126) requires development proposals impacting existing markets to improve the overall quality of the market and the public realm.***

		The Roman Road Market Action Plan emphasises that "it will be important to ensure that market improvements do not price the traditional traders out." The Council will need to work closely with traders to support and manage future changes such as public realm improvements and pedestrianisation in order to revitalise the market and attract new customers. There is no longer a bank or building society in the market, and a larger post office is urgently needed. Partnership work with the Roman Road Trust, Roman Road London and the Neighbourhood Forum will be important during this period of change.
PM3	Page 34	**4.2.4 Justification** The need for local, flexible ... E3 2AD. The ***emerging*** Leaside Area Action Plan .....major developments with workspace should provide ~~10%~~ ***some*** of that floorspace ....
PM4	Pages 40 & 41	**5.1 Summary of current issues** ***Bow is generally well served by public transport, with Mile End in the south of the plan area being a major tube and bus interchange. The Bow Road District Line and Bow Church DLR stations are also on the southern boundary of the area. The Tower Hamlets Local Plan (p.186) acknowledges congestion and overcrowding of the transport network and the need for further investment. The plan area's proximity to Central London and Docklands means high volumes of vehicles pass through it daily. The area is bound on three sides by major traffic routes – Grove Road (A1205) and the Blackwall Tunnel Road (A12) running north-south, and Bow Road (A11) running east-west. The TfL funded Liveable Streets Bow research found over 33,000 daily journeys were made within Bow. Of these, 49% were***

		vehicles travelling through the area and not stopping. This means over 16,000 journeys were made by non-residents, contributing to air pollution on streets, outside schools and around local shops. The Liveable Streets Bow programme is seeking to reduce commuter traffic and improve infrastructure for cyclists and walkers, whilst at the same time ensuring that the market and local businesses along the Roman Road can continue to receive deliveries conveniently and are well serviced. People are discouraged from walking and cycling in the area because most routes are along busy main roads that are dangerous, and with high levels of air pollution. ***This is why specific roads are mentioned in the policy.*** It is likely that more people would walk and cycle if ~~there were attractive routes through green areas away from main routes~~ ***motor traffic volumes and speeds were reduced on main roads, and improved, continuous walking and cycling infrastructure installed.*** ***It is envisaged that central government, Transport for London and Community Infrastructure Levy*** ***(CIL) will be the principal sources of funding for improvements across the plan area, together with*** ***direct developer S106 or S278 contributions for specific developments. Street clutter, such as the night-sky podiums in Gladstone Place, and local directions signs which can be easily turned around, are a hindrance.*** **Policy GS1: Improving safe walking and cycle routes** **1. Safer walking and cycling** ~~D~~ ***Major d***evelopment***, as defined in the Council's Full & Outline Planning Applications Checklist*** is required to enhance the pedestrian and cyclist

		experience ***with high-quality, dedicated infrastructure on busy main roads, and*** by improving pavements, cycle routes .... This shall be achieved, where appropriate, by: .... After updating text, numbered points 1-9 will be replaced with letters a - i. Reworded clauses 7 & 8: ***g Other features associated with pedestrian access to the development, including seating for pedestrians and signage, particularly on Green Grid routes.*** ***h The provision of safe road crossings where needed, including at the junctions of the A12/Wick Lane/Tredegar Road, Fairfield Road and Tredegar Road, St. Stephen's Road and Roman Road and at Tom Thumb's Arch. A new zebra crossing is needed in Malmesbury Road.*** Add the following to Policy GS1 after point 9/***i***: ***This will involve joint working with Newham, and with the LLDC until approximately 2025 when planning authority for the areas currently administered by the LLDC are expected to be returned to the boroughs.*** Page 40 Fig 16. A dotted blue line should be added for new cycle intervention along St Stephen's Road (linking Old Ford Road and Tredegar Road.)
PM5	Pages 50 & 51	**Policy PS1: Enhancing public realm spaces** Proposals to enhance..... Improved provision for recreation and play***, including*** on housing estates .... high quality landscaping. Public realm .....or similar environmental

		measures***, including*** at: ..... Corner of Bow Road and Alfred Street E3 2AD. ***Proposals for enhancement of the public green space in Mile End Park will also be supported.*** **Figure 21: Public realm spaces map** Correct the numbering to show Corner of Bow Road & Alfred Street as ***10***, not 9.
PM6	Pages 54 & 55	**Figure 22: *Local Green Spaces and other* Publicly accessible open spaces ~~map~~** Modify the map so that the eight Local Green Spaces named in Policy PS2, and illustrated on Page 55, can be distinguished (by use of a different colour) from the other open spaces listed in Tower Hamlets Parks and Open Space Strategy, 2017-27. Modify the key to the map to clarify the distinction between the Local Green Spaces and the other open spaces.
PM7	Pages 60, 61 & 62	**Policy HE1: Bow Wharf waterway infrastructure conservation and enhancement** Modify the last paragraph: Development proposals must ....recreational activities and, ***where workspaces are provided as part of redevelopment,*** affordable workspaces for small businesses ***should be provided in line with the Local Plan***. Recreational provision ..... 7.2.4 At the end of **Justification** add ***The South East Marine Plan includes the Policy SE-HER-1 'Proposals that demonstrate they will conserve and enhance the significance of heritage assets will be supported'.*** **Figure 24: ~~Policy HE1 Locations Map~~ *Public Houses including those to become locally designated heritage assets***

		Distinguish (by using a different colour) the five public houses to become locally designated heritage assets, and modify the map's key to explain this.
PM8	Page 66	**7.4.1 Key issue** Re-word as follows: ***Current planning policies expect new public houses to be located in the designated town centres, (District Centres or Neighbourhood Centres). Drinking establishments elsewhere will only be supported where they are local in nature and scale. Given the restrictions on location, it may be difficult for innovation in new forms of public house.***
PM9	Pages 68-70	**8.2 Policy on site allocations** **8.2.1 Key issue** **Modify the last two sentences as follows:** 8 sites were assessed ~~a mix of publicly~~ .....~~that are also available.~~ ***of which, one site was considered to be suitable for development, and a further 6 were considered to be potentially suitable for development, subject to identified constraints being addressed. One site was considered to be unsuitable for allocation due to a recent planning permission for residential development.*** **8.2.2 Policy** Extend the second paragraph by adding at the end: ***Planning permission, for this temporary use of the site, was granted in December 2021. The site is suitable, and should be available over the longer term, for permanent housing. The Options and Assessments Report estimated the site's capacity as 16-60 dwellings. The main constraints to development include proximity to the A12 Blackwall Tunnel***

		Road to the east (noise and air pollution); medium risk of surface water flooding (needing mitigation); and the presence of the infrastructure/safeguarding zone on the southern edge of the site (future potential upgrading of the bridge over the A12). **Policy H1: Site allocation and housing development** Add a new sentence at the end as follows: ***Proposals for new housing development on small, infill sites, assessed as suitable and potentially available in the Roman Road Site Options and Assessments 2020 report, and subsequent updates to those assessments, will be taken into consideration in decision-making.***
PM10	Page 73	Ahead of **Policy H2,** insert the following text ***Community led housing is where:*** • ***Open and meaningful community participation and agreement takes place throughout the process of designing and developing housing proposals;*** • ***The community group or organisation owns, manages or stewards the homes in whichever way they decide, having had regard for the results of community consultation;*** • ***The housing development meets the general needs of the local community, the specific needs of those who will be occupying the housing, or both. The expected benefits should be legally protected in perpetuity.***
PM11	Page 77	**Policy CF1: developing new and improved sports and play facilities** Modify the third sentence to read:

		New ***major*** residential developments .... Add the following after "will be strongly supported" (penultimate sentence): ***New or improved play provision will be supported at:*** • ***Lawrence Close E3 2AS*** • ***Heylyn Square E3 2DW*** • ***Rectangular paved area with hedges at foot of Wilmer House, Dayling Way E3 5NW*** • ***Tarmac Square outside Forth House E3 2HQ*** • ***Sutherland Road E3 5HG.*** Proposals to improve ~~the quality of~~ existing sports and play .....
PM12	Page 87	**10. Priorities for Community ~~Interest~~ Infrastructure Levy (CIL) funding *or its replacement*** Move section 10 to a separate page, with a corrected heading, which is more prominent, and highlighted in yellow.

Appendix 2: Statement of Common Ground (April 2022)

Please see separate attachment.