



**ROMAN ROAD BOW NEIGHBOURHOOD FORUM**

**Roman Road Bow Neighbourhood Plan 2021-2031**

## **Summary of Regulation 14 representations received**

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

	<b>Summary of Regulation 14 Representations, September 2021</b>		
	<b>Dates of Reg.14 consultations:15 March to 27th April 2021 and 5th July to 15th August 2021</b>		
<b>Organisation /resident</b>		<b>Response by RRB Forum</b>	<b>Change to NP (if any)</b>
			Text in this colour means changes have been added to draft plan.
<b>1. High street and local economy</b>	Tower Hamlets requested policies come first in each chapter, followed by actions. Numbers to be consecutive e.g. Policy LE1, Policy LE2, Action LE3, Action LE4		Re-order text, with policies coming first, followed by actions, all with consecutive numbers, so no policies and actions have the same number. Renummer figures, omitting the pre-fix '1'.
Historic England	The document is generally well structured and we are pleased to note the identification of specific heritage objectives. We would agree that traffic congestion and the severance of routes into and from Hackney Wick and the Olympic Park are particular issues which effect the potential economic and social growth for the neighbourhood. Improving the public realm and links over the A12 would help Bow access the developing cultural and educational facilities within the Olympic Park while improving public access to Roman Road and Bow Market with the potential to encourage greater activity around local independent businesses. Opportunities to link creative industries and arts based facilities within the Roman Road area with facilities and activities in Fish Island and beyond would also help to support greater cultural activity.	Comment noted	
GLA Culture and Creative Industries Unit response			
Policy LE1: Encouraging	Flexible use of existing premises is encouraged, and this supports the aspirations of the Cultural Infrastructure Plan to increase capacity for	Comment noted	
	London Plan Policy SD6 sets out the importance of variety within a high street setting, including night time and evening activities.	Reference London Plan policy SD6	Reference London Plan policy SD6
	London Plan Policy E3 supports the aspiration to secure affordable workspace at rents maintained below the market rate for social and		
	changes to the Use Class Order which came into effect in September. This provides the opportunity to use spaces for cultural and community use including workspace, supporting the GLA's High Streets for All Mission which aims to work with London's diverse communities to establish new, exciting and experimental uses across London's high streets and public spaces.	Comment noted	
<b>LBTH</b>			

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Policy LE1	<p>This is an interesting policy area at the current time, due to something of a contradiction between local and national policy on this issue. The Tower Hamlets Local Plan Policy D.TC2 aims to protect existing retail in town centres by not supporting conversion to other uses in situations where the amount of retail uses in a town centre frontage would fall below a threshold of 60% or 40%, depending on the area. In essence, the policy aims to put some limits on flexibility within town centres in order to try and protect their traditional function as retail centres.</p>	<p>Tension acknowledged between national and local policy</p>	
	<p>However, recent changes to the Use Classes Order have placed a greater emphasis on flexibility in town centres, moving a number of previously separate uses (including retail, professional services, cafes, offices, and some community uses) into a single Class E, meaning that planning permission is no longer needed to switch between these uses.</p>	<p>The Forum welcomes the greater emphasis on flexibility due to the recent changes in the Use Class Order, and believes too much emphasis has been placed on retail as the anchor for high streets.</p>	
	<p>In some respects then, Policy LE1 can be said to be in conformity with national policy (by encouraging greater levels of flexibility) while not being in conformity with local policy. In general, we welcome the neighbourhood forums thoughts on possible responses to the changes in the Use Classes Order and their potential impacts on planning for town centres. However, we feel that significantly more detail is needed in the supporting text and the policy itself to explain what is intended by this policy and how it can be applied in practice.</p>	<p>We will review policy and consider what further details might be added to policy and its intended use. We will also distinguish more clearly between encouraging greater flexibility of existing employment space and the provision of new flexible and affordable space.</p>	

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	In particular, the Council's Enterprise Team have noted that while the idea of designing buildings for flexibility of uses seems sensible in theory, in practice it is often hard to achieve as specific occupiers will have specific needs, and these may be quite different between different class E uses – for example, the needs of a retail space are different from those of a café. It may be difficult therefore to design new developments to be inherently flexible between all class E uses.	We need to consider whether to focus on flexible co-working spaces with shared facilities or smaller self-contained spaces such as 25-50 sqm micro-employment spaces	remove reference to 2015 footfall report report on page 35
	The reference to 'communally-shared facilities' is also not clear, and it is not clear whether the policy is aiming to encourage shared workspace or 'hot desking' developments. If this is what the policy aims to encourage, it should be clearer; and at the same time, we would be wary of putting such an aim in policy at the moment, as a number of workspace providers are looking at moving away from the communal hot desking model at this time due to concerns around the coronavirus pandemic. We note the reference in section 4.2.4 to the Roman Road Footfall Report which recommended the provision of hot-desking and co-working spaces, but also note that this is from 2015, and it would be good to understand if the same conditions still prevail six years on.		omit reference to shared facilities in para 4.2.4
	We also note that while some tenants may want "flexible, short term" tenancies, others may want greater levels of certainty – there is a potential that encouraging specific tenancy models may restrict some users while providing flexibility for others. It is difficult but not impossible to control tenancy models through planning conditions, and the Council does achieve this through the requirement in Local Plan Policy D.EMP2 for 10% of employment floorspace on major proposals to be affordable. The draft Leaside Area Action Plan also contains a policy (LS6) that would require employment developments in that part of the borough to provide 10% of employment floorspace as smaller units between 25-50sqm that would be suitable and more affordable for smaller businesses and start-ups, and that these units should be fitted out for such potential occupiers to easily move into. The Leaside AAP is only at Regulation 18 consultation stage at the time of writing, and this policy has therefore not been examined, but we would suggest that something along the lines of D.EMP2 or LS6 could be included in the neighbourhood plan, with a requirement for a certain percentage of space to meet particular requirements related to size or perhaps tenancy requirements.	For new employment space, we will consider shifting the emphasis of the policy to the provision of providing affordable workspace at less than market rates, including smaller units 25-50 sqm and a certain % of flexible tenancies. Use planning obligations to achieve this. - London Plan Policy E3, Local Plan policy D.EMP2, draft Leaside Area Action Plan LS6	Policy LE 1 changed to strongly support proposals to deliver class E uses that are capable of supporting maker spaces, cultural or leisure activities and social enterprises.

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	The same Leaside AAP policy also contains a clause requiring new employment developments to provide a Commercial Strategy Statement, which would include an explanation of why a particular design and specification is being proposed, who its intended occupiers are, a marketing strategy to attract those occupiers, and an indicative rent level. The purpose of this is largely to ensure that new employment space in the Leaside area is not left unoccupied, but it could also play a role in identifying that new developments are encouraging a suitable range of employment uses. Again, we stress that this policy is under consultation and has not been formally adopted yet, but something similar to this could play a role in the forum's thinking.	Consider including a requirement for a commercial strategy statement in policy	
	The supporting text could also usefully contain some detail on the specific needs of the social enterprises and creative industries, if these have been identified – what kind of facilities do these industries need that might not be provided in more conventional employment spaces?	Comment noted	
	The policy should also highlight whether it is aimed at a particular geographical location. Presumably, this is intended to apply only in the town centre – if that is the case, the policy should explicitly say this, to remove any suggestion that development proposals for commercial activities might be encouraged elsewhere in the neighbourhood area.	new policy wording adopted - no locations specified	<i>in order to support the Bow economy, proposals to deliver class E uses that are capable of supporting maker spaces, cultural or leisure activities and social enterprises will be strongly supported. Such proposals must ensure that they do not have a detrimental impact on the amenity of surrounding occupiers, particularly</i>
	To conclude, we are not able to support this policy as currently written. The policy needs to be significantly clearer about what it wants to achieve and how to achieve this through planning policy. Some suggestions have been given in the above comments about how the policy might be written to achieve some of the forum's aims, and we would be happy to hold further discussions with the forum following the consultation to help develop this further. It is likely that any policy in this area would need a significant amount of supporting text to explain the nuances of how the policy should work in practice and what will be expected of developers.	Discuss a draft revised policy with LBTH	

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	We also have a couple of more general comments on the text around this policy. Section 4.2.1 identifies some potential causes of the number of vacant business premises on Roman Road, but doesn't provide any evidence that these are indeed the causes. In section 4.1 where percentages of vacant units are used, it would be useful to also know the absolute numbers of vacant units.	Market area 12/120 vacant St. Stephens - Grove Rd 19/101 vacant	Include numbers of vacant units
	The key to figure 1.14 says 'proposed town centres' although this shows the designated town centre for Roman Road East – this is presumably because the map has been taken from a Tower Hamlets evidence base document from before the new Local Plan was adopted.	We will replace figure 1.14 with a more recent map.	draft policy page 35. replace figure 1.14 with map on p.56 of <a href="#">Tower Hamlets High Streets &amp; Town Centres Strategy 2017 - 2022</a>
Action LE1	We are generally supportive of this proposal. However, we would be interested to know whether the forum has been in communication with the owner of this site, and their opinion on the proposal – as the agreement of the owner will obviously be key to implementing any changes. We appreciate that this is listed as an 'action', and therefore represents a community preference rather than a strict planning policy, but it is likely that an inspector of the neighbourhood plan will also want to know what engagement has taken place with the owner of the site. If the owner was in agreement with the proposal, then there is no reason why this could not become a formal site allocation, with some additional detail added around what is expected from the site.	Follow up with owners of Bow Business Centre (Mike phoned and sent email on 13/05/2021)	
Action LE2	We are supportive of this proposal. The Council's Enterprise Team has noted that there are existing programmes (WorkPath, Young WorkPath, and Tower Hamlets Education Business Partnership) that can support this objective, and these could be referenced in the supportive text.	Comment noted	include a reference to the different programmes
Action LE3	We are supportive of this proposal, and have no further comments on it at this time.	Comment noted	
Local resident	Roman Road is ugly, even many of the units with businesses have shopfronts signs that are shabby, missing altogether or badly maintained. We need to enforce a responsibility of business owners to maintain their shopfronts. To help with this maybe loans and grants should be made available to facilitate this?	Comment noted	
	To encourage the night time economy during the summer months maybe the eastern section of Roman Road could be closed to traffic with restaurants cafes and bars able to put outside tables and chairs on the street. If it doesn't exist already a local business association should be set up up for businesses on Roman Road enabling the set up of a Business Improvement District in a similar way to InStreatham say <a href="https://www.instreatham.com/">https://www.instreatham.com/</a> In any plans for Roman Road we should make sure that accessibility for disabled residents is considered and prioritised.	Liveable Streets programme will make market area pedestrian-only during daytime.	

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Local resident	I personally find Bow House Business Centre ugly and uninviting I feel for it to be a reasonable solution to the objectives in the report substantial investment would be need to clean and renovate the property. Perhaps other alternative sites should be considered.	Comment noted	
	I have lived on Lichfield Rd now for over 27 years and not much has changed. The market and immediate Roman Rd area really needs to be addressed and there are a lot of people who feel that this area isn't being utilised properly.	Comment noted	
Local resident	Two ideas here: the empty retail spaces should be used as pop up shops to increase interest and drive footfall to the area. There are too many real estate agents and nail bars (who only take cash. Is that legal?). This however isn't as simple as it should be, as I have tried myself. There is resistance from the council and local estate agents marketing these sites. I have been told several times by the agents at Look that several properties I enquired about were now 'taken'. This was about a year ago and they are still empty. There is also a shop opposite Bonner Square that has been empty for years and is supposedly for rent by the council. When we enquired, the person at the council was very evasive and said it wasn't for rent anymore. It has since been witnessed that someone is using the locked up premises to store goods. Meanwhile, it continues to be an eyesore.	Evidence noted of challenges experienced by local people who try to find meanwhile use for empty retail units	
	My second plan is to open up Roman Rd market on a Sunday to sell vintage, food, books, etc. A bit like Broadway market or how Spitalfields market used to be. This would really support small business owners and artisans, plus offers a variety we currently don't have. The local school could be approached to hire out their playground and parking space as a parking site. This would be a great way of encouraging a larger sector of people to the area, provide business to the current street vendors, plus support expansion and create interest for new shop holders.	Noted and informed resident about Roman Road Trust	
Localresident	Exciting to see the Draft Neighbourhood Plan. I see lots of great initiatives, ranging from plans to bolster the Roman Road shopping infrastructure, to developing better cycle routes.	Comment noted	
Local resident	I applaud the commitment to flexible use of retail space on Roman Road, and urge you to go further if possible.	support for flexible use of retail use noted	
Local resident	Rejuvenating the market. It strikes me that a concerted effort is need to relaunch the market. Can we attract a greater diversity of stalls? Can we tidy up the look of the current stalls? Could more food/drink provision be brought in? How can we/the council support this? Better market = more visitors = more customs for shops = more shops open too.	support for rejuvenating the market noted	
Local resident	Empty units. 100% agree on all steps to get them back into use. But while note in use, what can be done to tidy them up. Colourful posters by local students? Use for art projects? Some creative thinking here could lead to cheap, effective action to cheer these up!	support for meanwhile use of empty units noted	

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Local resident	4.2 does discuss implementing flexible use class. However it should go further or make a bigger point to allow for more cafes and restaurants onto roman road. I believe there is a restriction at planning level, about the % of retail vs cafes/restaurants, and this % should shift based on changing demands of Londoners. Most high streets in the city have changed this skew, but roman road seems to have been left behind, leading to the many empty retail units and high volumes of nail salons and declining importance of the street as a hub.	plea for shifting balance away from, retail towards other uses, including cafes and restaurants on the Roman	
Local resident	Objective 1: Thriving High Street and Local Economy		
	night time economy as we remember the problems caused to local	NOTED that development of	
Local resident	further or make a bigger point to allow for more cafes and restaurants	NOTED, - comment	
Local resident	shops in the Roman Road. There is nothing we can't buy except	Comment noted	
resident	residents'. We include ourselves in 'some resident'. The market is	NOTED that a local market	
same local resident	The Plan to remove the car park from the market is a stab in the back for a market that is and could be promoted as a Tower Hamlets wide placements is great. Need more workplaces to back this up. It isn't	relevant issue of	
		Comment noted	
<b>streets</b>			
LBTH			
Policy GS1	The aims of this policy are very strongly supported, and are in line with a number of strategies prepared by the Council in recent years around the need to improve connectivity in the borough, particularly for those walking and cycling, and for disabled people. As mentioned in the general comments, we think there is an opportunity for the supporting text to set out more detail of how the policy might be applied. In particular, the policy needs to be clearer about how developer contributions are expected to be used to deliver these improvements, as noted above in the section of general comments. In some cases, this will be possible through direct developer S106 or S278 contributions; but for wider changes to the area, these may be more appropriate as priority suggestions for CIL	Comment noted	
	further, which are set out below:		Reformat as 1.
	to specify (perhaps in supporting text) what kind of contributions are	Comment noted	Policy GS1 suggested as a
	routes for improvements to cycle lanes? If so, this should be said more	Comment noted	change to 'within
	to help emphasise the need for sites to enable connections to existing	Comment noted	'change to' new
	• Clause 4 – presumably this refers to "new public bicycle stands".	Comment noted	Public D.1.R.s' mentioned and
	Tower Hamlets Local Plan, which set out what an appropriate level of	Comment noted	a minimum of 2
	'appropriate width' is, or how this could be assessed when an application comes forward. It may also be possible to specify that this might require frontages of developments to be set back from the plot edge where existing pavement widths are inappropriate.	Comment noted	metres wide to allow 2 wheelchair users to pass.. (have delete 'where
	words "where needed" – this would set an expectation that pedestrian	Comment noted	replace' where
	• Clause 6 – would it be possible in the supporting text to identify some locations where safer crossings may be needed? Or alternatively to	Comment noted	needed' with 'an a
	from the addition of "where needed", as the provision of new bus	Comment noted	add 'where needed'
	• Accessibility clause – the reference to removing street clutter could do with some supporting text to set out what kinds of street clutter are	Comment noted	street clutter, such as the night sky
	mentioned in the policy – St Stephen's Road and Grove Road (Grove	Comment noted	Add to the Fig 1.1.6 heading
Action GS1	presented as a policy (or combined with the existing Policy GS1).	Comment noted	suggested wording changes accepted



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	The Council's Transport team have asked if the reference to a 'segregated' cycle lane on Grove Road be changed to say 'high-quality', on the basis that a segregated track may not be feasible on Grove Road, but that other options can be explored to achieve an inclusive cycling facility. They have also asked if the reference to blue badge parking on Roman Road be changed to say 'in the Roman Road area', as options are being explored for how access to facilities on Roman Road can be maintained at times when the road itself is pedestrianised. They have also asked if the reference to a 'proper cycle network' in the objective itself can be changed to 'high-quality', as this language is more easily definable in terms of transport planning.	Comment noted	1. High quality cycle route along Grove Road should.... 2. Proposals for School Streets for all schools in the area will be supported 3. ...parking provision in the Roman Road area.... 4. 'proper' replaced by high quality in the wording of the objective
Local resident	and 5 you refer to 'bicycle', this should be changed to 'cycle' as it is deemed	Comment noted	Change an
	cycle stand outside Tesco in Gladstone Place.	Comment noted	reference to
Local resident	Road/A12 junction. I have raised this on numerous consultations over	Comment noted	Have added text
Local resident	Walking: We are frustrated by cyclists and pedestrians classified together. They often have conflicting interests e.g. cycle lanes behind bus stops. on park paths, the use of pavements and zebra crossings. Canal towpaths have become a no-go area for many pedestrians, including people who have used and valued the towpaths all their lives who say they do not go there now because of the aggressive cyclists who see it as their personal cycling path. When the towpaths were officially opened to the public in the 1970s, signs at entry points stated: 'Please do not cycle in this park', British Waterways stated that the towpath was not suitable for cyclists and that 'cycling would conflict with the interests of existing users' i.e., pedestrians. Now that there is an extensive cycle paths network developing, the Plan should press for the Canal and River Trust to ban and prevent cycling on the towpath, so they can again be used without constant interruption and for quiet contemplation and nature rambles by pedestrians. There is also an issue about diesel pollution from canal boats. This should be discussed	Comment noted	
	Electric scooters etc. The Plan makes no mention of electric	Noted, but	
	electric charging, more and more vehicles are and will be electric	The issue of	
	during the period of this Plan. Already, we see electric charging wires	electric charging	
	seems to be contradicted by 'well signed footpaths'. It is certainly	Comment noted	
	streets and open spaces do not pay enough attention to what happens		
	Mile End Station: Step free access at Mile End would be wonderful.		
<b>public</b>			
Environment Agency	We aim to reduce flood risk, while protecting and enhancing the water environment and together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at:	Comment noted	

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	<a href="http://web.archive.nationalarchives.gov.uk/2014/03/26/64622/http://con.environment.agency.gov.uk/LIT_6524_7da281.pdf">http://web.archive.nationalarchives.gov.uk/2014/03/26/64622/http://con.environment.agency.gov.uk/LIT_6524_7da281.pdf</a>	Comment noted	
LBTH			
Policy PS1	on the policy itself. Again, the supporting text could include a 'how this	Consider adding a 'how this	A list of priorities for CIL funding was
Policy PS2	The supporting text sets out the context around the designation of Local Green Spaces proposed. It is not a green space, and for the sites clearly they do not meet the criteria of being in close proximity to the community and local	The local events in the vicinity of open spaces are	
	we note that policy D.OV53 in the Local Plan provides significant protection to open spaces in the borough (and not just those that are	Given the lack of local sites for	
	been consulted and are supportive of their sites being designated, we	Comment noted	
	proposed could meet the test of being demonstrably special and locally	This counters the objection, as this is a	
	• Dairy Way – as an area of amenity green space attached to a		
	• Holy Trinity Churchyard – given the listed status of the church and the		
	• Lockton Green – as a small area of play space within a housing Local	This space is on the site of an	
	• Marina Gardens – as an area of amenity green space attached to a	The gardens are on the site of an	
	• Treins Square – given the scarcity of this in the borough opportunities	of site of an	
	in Tourick House – as an area of amenity green space attached to a	of site of an	
	housing estate, we would not say that this site has enough significance	green space is	
	as children's playspace, and particularly its role as an adventure	Comment noted	
	• Wrennington Green – this site is already designated in the Local Plan	SINCS are non-statutory, and	
	• Wick Lane – as the common name as Site of Importance for Nature, the	As the site is located in the	Remove this site from the draft plan
	land to the east of Wick Lane is actually located in the LDC. The		
	as 'Local Green Spaces'. This should be altered – in the context of	we need to rename figure	Rename figure 1.22 'Publicly
Local resident	I think there is a case for being more radical on the use and management of green and community spaces. I recently moved from	Suggestion noted for	
Local resident	Policy PS1 suggests specific open space creation/improvement. These seem to have the support of the residents affected and will be	The Cheerhole	
	has settled down and both intended and unintended consequences		
	in our parks. They are dangerous and too many ignore the 'slow' signs	This is a valid park	
Local resident	hope will be in place before QMUL attempts to build an 8-10 storey line	Support for protecting green	
	Friends of Mile End Park, I am disappointed that FOMEPA was not		
	The RRB documents interchangeably describe Wrennington Green as part of Mile End Park and at others as "adjacent" to the park. For	The survey by Friends of Mile	Correct the name to the 'Art Pavilion'
	is indeed the "Art Pavilion" (with one "l")		
	much debatable. I think COVID has put change to that (again the		
<b>4. Heritage</b>			
<b>HISTORIC ENGLAND (see</b>	sets out detailed advice and approaches to identifying heritage assets	Consider highlighting in	There are 7
	houses identified is clearly set out. As NPPF Policies for locally listed	review heritage	conservation areas
	conservation and enhancement. This could benefit from minor editing	review policy	
		HE?	

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	Development proposals at Bow Wharf must demonstrate how they reflect the historic character of the area and how they will enhance both its heritage significance and cultural vibrancy. Proposed development must therefore submit a comprehensive statement of historic significance clearly demonstrating how proposals positively reflect and are informed by the existing historic context and how the proposals will enhance the historic character of the area. Developers are advised to ensure plans are developed in consultation with the Council's conservation team, neighbourhood forum and the Canal and River Trust. Proposals must demonstrate widespread consultation with local Development proposals must provide for an appropriate mix of uses that include leisure and recreational activities and affordable	Review policy and consider the new suggested wording. Emailed proposed new wording to Canal & River Trust 13/05/2021, asking for their view. See below	New policy wording from Historic England to replace existing wording.
	As a general observation we note that the Draft Plan sets out at length the relevant Local Plan and national policies relevant to the proposals. We would consider there is potential to reduce this element within the document in order to allow greater space for neighbourhood analysis, themes and evidence. In respect of the heritage policies it would be advantageous to better define the heritage context for the policies including the location of key assets. Where conservation area appraisals exist it would be useful to consider whether these are up to date, how well these define local character and whether there are key issues arising which can be highlighted in the neighbourhood plan. HEAN 11 gives further advice in undertaking this type of analysis	Consider reducing length of local and national plan references, and giving more emphasis to the heritage context and location of key heritage assets	
	archaeological interest (Archaeological Priority Areas). An analysis of	Consider mention of	Heritage as a potential source of
Canal & River Trust (Heritage and Environment )	The Canal & River Trust Heritage specialist agrees with the comments made by Historic England in respect of the rewording of the draft policy for Bow Wharf. In addition, the Trust would make the following, site-specific, comments: The Stop Lock has an important role to play in enabling an appreciation of the history of the HU Canal, and particular issues around water supply. The visibility of the lock chamber from the Stop Lock Bridge gives much opportunity for interpretation and appreciation of the lock itself, albeit disused. Restoration of the Stop Lock, including at least one pair of its gates, would enable its historic function and heritage significance to be better understood. The site would benefit from interpretation panels explaining the rich heritage of this waterway. Development should look to retain, where possible, important waterway operational facilities, including workboat and berths.	Support for Historic England's proposed rewording of policy. Additional site-specific points noted.	Adopted policy wording proposed by Historic England and include some of the specific points by way of explanation of the policy
GLA Culture and Creative Industries Community	enhance their cultural offer. The Cultural Infrastructure Plan calls on local authorities to develop long-term community asset transfer policies	Support for support for LBTH	
	London's cultural ecology. Officers support the suggestion made in the		include Culture & Creative Industries
	infrastructure such as rehearsal space was in high demand.	importance of	
	studios in London, but only 13% have secure freeholds. Preservation of	Comment noted	include this evidence in the
LBTH			

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Policy HE1	Three of the heritage assets identified in this policy are already either listed by Historic England or locally listed - consequently, there is no need to include them as locally designated heritage assets in the neighbourhood plan, as this provides no additional protection to that which they already benefit from. The pubs in question are:		Revise plan and map to show the correct status of pubs: Nationally listed Grade II : The Crown, Lord Tredegar, Palm Tree. On TH local list: Eleanor Arms, Little Driver, Lord Morpeth, Victoria. Proposed as heritage assets: The Albert, Coborn Arms, Green Goose, Morgan Arms and Young Prince
	• The Crown – Grade II listed by Historic England	Comment noted	Crown removed
	• The Cherry – locally listed by Tower Hamlets Council under previous name The New Globe • The Little Driver – locally listed by Tower	Comment noted	Cherry and Little Driver removed
	Local Plan policy S.DH3, "significant weight will be given to the	Comment noted	
	provide is not just the aesthetic qualities of the buildings, but their	Consider mentioning	mention of the potential of pubs to
Action HE1	currently written it is an 'action' rather than a policy. However, the	Consider whether we	
Action HE2	this time.	Comment noted	
Policy HE2	we are supportive of this proposal, although the forum should make clear whether they have had any engagement with the owner of the	Canal and River Trust were	
Local resident	particular The Lord Tredegar seems a glaring omission. I'm not sure		
Local resident	Designating Public Houses as Public Assets This is a great idea, but PLEASE can the Greedy Cow be added. It has an amazing history and should be prioritised. It is historic with links to the Spitfire propeller	The terrace of buildings which Comment noted	
Local resident	must specifically include the full protection of local Conservation Areas disappear. Including pubs, so their designation as local heritage assets	The importance of Bow Road Market is a	See top of the heritage section for
	state of the chimney in Bow Wharf should be included. The fibreglass	Comment noted	
	memories of the area.	Comment noted	
<b>5. Affordable housing</b>			

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	Dates of Reg.14 consultations:15 March to 27th April 2021 and 5th July to 15th August 2021		
Organisation /resident		Response by RRB Forum	Change to NP (if any)
TFL Commercial Development (see document folder)	In reference to Objective 5 on High Quality Affordable Housing of the draft Neighbourhood Plan and key issues identified by the Forum such as the scarcity of land for housing and the affordability of rents, Optivo, one of the UK's largest housing providers (https://www.optivo.org.uk/about-us.aspx) and Transport for London Commercial Development are proposing to bring forward a key opportunity site opposite Bow Church DLR station in the near future. It is currently envisaged that the proposed development provides new homes, including a high proportion of affordable homes that will give local residents a choice to continue to live in the neighbourhood. Alongside this, ground floor business and retail space, as well as improved public realm and new area of play space are also being considered. It is intended that the development coming forward provides high quality design all round with architectural details inspired by the character of the Fairfield Road Conservation area.TfL CD looks forward to engaging with the neighbourhood forum as the scheme develops.	THIS SITE IN Paton Close was considered for housing allocation in the plan and assessed by AECOM in their Dec 2020 report 'Site Options and Assessment', which gave the site an amber rating and concluded 'The site is potentially suitable and achievable'	
Thames Water (see	April 2018, and which are set out above, we would request that a Policy SI 13 Sustainable drainage of the London Plan 2021. Typically,	Comment noted The need for developments to	Paragraph added about developers
Water (see	Policy H1 comments. There are a number of Thames water assets in the Neighbourhood Plan area. In particular Thames Water own land	The advice about building over or near to a public sewer noted	
	If building over or close to a public sewer is agreed to by Thames Water, it will need to be regulated by a 'Build over or near to' Agreement in order to protect the public sewer, and/or apparatus in question. It may be possible for public sewers to be moved at the applicants request so as to accommodate development in accordance	over or near to' agreement if building over or near to a public sewer noted	
LBTH			
Policy H1	In theory, this allocation for housing is supported. In practice, as mentioned towards the beginning of this document, we have now found that this site appears to be partially inside the LLDC planning authority area. This complicates the situation, as the neighbourhood plan cannot allocate sites outside of its boundary, and the boundary	Noted, along with the need to work with LBTH an LLDC to resolve the Forum to provide map of site boundary taking into account the	Use site boundary shown in planning application by Place Ltd, PA/21/01162
	If this allocation is retained, a map of the site boundaries should be provided. The allocation could also identify further details of what would be acceptable on the site. It is good to identify that housing is an appropriate land use for this site, but are there any other requirements		
	In section 8.2.3 there is a quote taken from the emerging Central Area Good Growth SPD about the 'unclear and fragmented character' of Bow. It should be made clear that this sentence in the SPD referred specifically to one particular housing typology found in Bow, the '21st Century Urban Housing Growth' typology, and does not refer to the character of Bow as a whole. Following this, the neighbourhood plan	Noted, along with the need to work with LBTH an LLDC to resolve the boundary issue.	Link quote from Central Area Good Growth SPD to '21 Century Urban Housing Growth'.

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	In section 8.2.4 a reference is made to well-designed homes and the climate emergency, but it's not clear what role these play in relation to the policy, as the text seems to talk about them only in general terms. If these are elements that should be reflected in the housing on the site allocation, this should be made clear (although also consider that in some cases, these may already be required by Local Plan policies).	Consider including reference to good design and implications of climate change in design principles to be followed on the site.	
Policy H2	This is another instance where adding more detail to the supporting text could be very useful. In particular, it would be an opportunity to define very clearly what is meant by a 'community led housing group', and to specify that these groups will need to be registered affordable housing providers. The Council's Affordable Housing Team have noted that it is usually the case that one provider would take on all of the affordable housing in a development – that is, both the intermediate housing and the social rented housing – whereas this policy currently only encourages community-led housing groups to take on the intermediate housing, requiring another registered provider to take on the social	Comment noted	Need to define community led housing, and mention this needs to be provided by registered affordable housing providers.
Local resident	too many new developments claiming to be affordable are way beyond the means of people most in need. The measures are laudable, but many more powers are needed – we recognise this is a national issue.	Comment noted	
	sell off their 'valuable' housing stock, i.e., houses in Victorian terraces.	Comment noted	
	homelessness in Bow is too often hidden. more housing is an obvious answer. But so is consideration of provision for people who are single	Recent housing needs	
<b>and Well-</b>			
Sport	buildings and land, including playing fields, should not be built on	Comment noted	
	Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.	We have considered the Council's Sports Facilities for the Future 2017-2027 report, but it is completely unrealistic to expect most young people from Bow to travel to the Olympic Park to access venues such as the Copper Box, as suggested by the local	
	where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate	Section 12,	
	Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the	Support for the idea that 'If	

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LBTH	Planning Practice Guidance (Health and wellbeing section), links		
Action CF1	we are generally supportive of this proposal, although the text may need some rewriting for clarity – the text currently refers to “the Council	review this action point as it	
Action CF2	proposal, and does not support the proposal of a transfer of assets	Comment noted	Clarify in the text that only Chisnehale
	and says “local authorities are permitted to dispose of local authority	Comment noted	Clarify that local authority consent
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.H2 clause 5.	we sought to identify existing	
Policy CF2	around the need for clarity about how improvements will be provided.	Policy CF2: we are not	Policy CF2 changed to an
Policy CF3	for the maintenance of community centres should be listed as an	Consider changing policy	Policy CF3 changed to action
Action CF3:	at this time.	Comment noted	
Local resident	Are we planning to adopt a local design code for local development? The Government has recently introduced new plans in this regard.	<a href="#">we do not plan to adopt design</a>	
Lcal resident	any need or scope for including other housing measures, to the extent	most of these suggestions are	
Local resident	a neighbourhood that feels safe for all residents, particular focus should	Comment noted	
Local resident	Road to give the school and the community some well thought out	Comment noted	
Local resident	Chisenhale industrial buildings and wharf is very welcome, as is the	Support for renovation of	
Local resident	organisations are run by volunteers. They do not have the time or Chisennare gallery - love this proposal, lets make this happen! Fabulous potential in that building. Action needs to be taken now before	Comment noted Support for idea of community	
<b>topics</b>			
LBTH	Corporation (LLDC) that there is a problem with the designated		
boundary of plan area	Neighbourhood Area as designated by the London Borough of Tower		
	designated in these areas by Tower Hamlets – designating		
	There are three particular impacts of this situation that should be noted: Firstly, the site allocation in Policy H1 of the neighbourhood plan	The Forum accepts part of	
actions	document, as suggested in the Planning Practice Guidance on	Comment noted	

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	<ul style="list-style-type: none"> <li>• Within each chapter, the 'actions' should all be placed after the policies – in the chapters on objectives 4 and 6, the actions are currently interspersed with the policies.</li> </ul>	Comment noted	Switch 7.4 and 7.5 so the Bow Wharf policy is 7.4 and heritage trail action 7.5. Policy sections 9.4, 9.5, and 9.6 to become 9.2, 9.3 and 9.4 respectively. Action sections 9.2, 9.3 and 9.7 to become 9.5 and 9.6. 9.7 action remains the same
	numbering of the policies – for example, there is currently a Policy LE1	Comment noted	Adopt consecutive numbering for
Supporting Text and	nuances of how policies will be applied. At the moment, policies are	Need for greater supporting	
Developer contributions	developer contributions. It is useful that the plan recognises that these	comment noted	
	contributions that are made a condition of the planning permission and	comment noted	
	development on the basis of the amount of floorspace delivered. This	comment noted	
	in which direct developer contributions will be required, particularly on	Comment noted	
The plan and CIL	examination stage in Tower Hamlets (Isle of Dogs and Spitalfields)	Consider setting out the Forum's	A list of the Forum's priorities
	such a list of CIL priorities in a single place, although a number of	Comment noted	
References to planning	should now date it from 2021, as the final version of the plan was	Comment noted	Update references to the London Plan
Formatting	footnotes would be a better choice, as it allows the reader to more	Comment noted	
	no figures labelled '2.[x]', there appears to be no reason for the use of	Comment noted	Delete prefix 1 to the figure numbers
	as bullet-pointed lists, but are not showing in this way – for example,		
Introduction, Context	the primary issue is around the description of the presumption in favour of	Comment noted	Adopt the suggested change to the Neighbourhood Plan
	in section 1.4, not clarity, the second paragraph should read: "If a	Comment noted	
	Neighbourhood Plan, once adopted, will represent one part of the		
LBTH	1. This document forms the response of the London Borough of Tower Hamlets ("the Council") to the second Regulation 14 consultation the second Regulation 14 consultation on the Roman Road Bow Neighbourhood Plan, as the second Regulation 14 consultation on the Roman Road Bow Neighbourhood Plan, as prepared by the Roman Road Bow Neighbourhood Forum ("the Forum"), held between 5 July and 15 August 2021.		



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(Response to impact of boundary changes)	2. We recognise that this second round of consultation is specifically in response to a boundary change that was made on 30 June 2021. This change was in response to the realisation, during the first Regulation 14 consultation, that the original designation of the Roman Road Bow Neighbourhood Planning Area had inadvertently included land that is within the London Legacy Development Corporation (LLDC) planning area. The Council did not have the authority to designate land in this area for planning purposes, and did not intend to do so. This designation of LLDC land was recognised by the Council as a mistake once it was brought to our attention, and was corrected. In discussion with the Forum and the Council's legal team, it was felt necessary to run a second round of Regulation 14 consultation on the neighbourhood plan to invite representations on the impacts of the boundary change.	comment noted	
	3. The boundary change moves the boundary slightly to the west of where it was originally designated, and removes a small but significant area of land from the Roman Road Bow Neighbourhood Planning Area, and has effects on two policies. As the issue of the boundary mistake had been brought to the Council's attention before we submitted our response to the original Regulation 14 consultation, we included a discussion of its impact in that response. However, for the sake of comprehensiveness, we will briefly reiterate our position here. This document should be read in conjunction with our original regulation 14 consultation response.	comment noted	
	4. We understand that an update to the draft neighbourhood plan has not been made at this stage, so our response relates to the content of the draft neighbourhood plan that was consulted on in the first Regulation 14 consultation.	This understanding is correct	
	5. The land to the east of Wick Lane was included in neighbourhood plan policy PS2 as a potential Local Green Space. This land has now been removed from the neighbourhood planning area, and should no longer be included in policy PS2.	comment noted	Land to the east of Wick Lane proposed as a Local Green Space withdrawn from the draft plan.
	6. A portion of land on the western bank of the A12, to the rear of Candy Street and Wendon Street, has been removed from the neighbourhood planning area. This land was included as part of policy H1, a housing site allocation for the "site between the rear gardens of Wendon St E3 2LW and the A12". The change to the neighbourhood planning area boundary means the boundary of the site allocation will also need to be changed, and the area of land that can actually be allocated will need to be reduced. This may have an impact on how viable the allocation is. However, from discussions with the Forum and the LLDC, we understand that it may be the case that enough land remains in the neighbourhood planning area for a housing allocation, with land in the LLDC area acting as a buffer from the A12. Whether	comment noted	The site proposed for housing to the rear of Candy St. and Wendon St. has been reduced in size. The land along the western edge of the A12 within the LLDC has been removed from the site.

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	7. In paragraph 60 of our response to the original consultation, we stated that “in theory, this allocation for housing is supported”, and this is still the case, if the neighbourhood plan can provide a convincing case that housing on this site is feasible. We also noted, in paragraph 61, that a map of the site boundaries should be included, and that requirements related to design, access and infrastructure should be considered as part of the allocation. These comments would be relevant to any site allocation, but are particularly important for such a tightly constrained site as this.	comment noted	The revised site boundaries will be those in the planning application PA/21/01162/A1 submitted in June 2021 by Place Ltd and LBTH.
	8. The Council does not believe there are any other impacts of the boundary change on the draft neighbourhood plan. Our comments from the original Regulation 14 consultation still apply on all other aspects of the plan.	comment noted	
National Grid (see	small amount of land directly affected, we are hopeful that a re-run will	Noted, but a	
Local resident	and with a neighbourhood forum, why, then, are you referring to yourselves as “Roman Road AND Bow Neighbourhood Forum”? This is inaccurate and misleading for two reasons: 1. There has already been a name change, quite rightly, from the original proposal of “Roman Road Neighbourhood Forum” as only half of Roman Road lies within the Forum area. 2. Bow covers a larger area including in the south, for instance, parts of other wards such as Mile End, Bromley North and Bromley South. Furthermore, I believe that the name in itself is conducive to bias as you will see from the remarks that follow, and I suggest that “Bow East-West (BEW) Neighbourhood Forum” would be terrifically accurate and inclusive. [Slogan: BEW is Beautiful!]	Roman Road Bow' is the formally designated name of the forum and plan area.	
	Town Residents Association Area. It was the Forum which was keen to	Comment noted	
	there are 38 references to “youth” and 22 references to “child” or	Comment noted	
	once attracted visitors from across London, but has been in decline in	Comment noted	
	TfL “to ensure step-free access at Mile End underground” as this would	Comment noted	
	of priorities and benefits in short, and sadly, the current Draft Plan fails to reflect properly the Neighbourhood Area or its Community.	Comment noted	
	a neighbourhood that feels safe for all residents, particular focus should	Comment noted	

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Local resident	<p><u><a href="#">Climate emergency: As the document below from the Centre for Sustainable Energy explains, too many Local Plans fail to address the enormous changes that are going to have to be implemented within the timespan of any decade-long plan, such as yours.</a></u></p> <p><u><a href="#">Yes, bike routes and car reductions are addressed, but, doesn't the Local Plan need to go much further into details about intentions for urgent Carbon Auditing of all property (New build and historic), ramping up the availability of car charging points, wholesale replacement of gas boilers etc.</a></u></p> <p><u><a href="#">LBTH have pledged to make their operations Net Zero Carbon by 2030, so all this has to be 'locally planned' now. They aim for the entire Borough to be Net Zero Carbon by 2050 and again, the dialogue in any plan about how this will be achieved at a local-level needs to be advancing right now.</a></u></p> <p><u><a href="#">Surely, for the Roman Road Bow Neighbourhood Plan to be relevant, now, through to 2031, it needs to address all the complex issues connected to the targeted LBTH goal of reaching Net Zero Carbon? <a href="https://www.cse.org.uk/news/view/2484">https://www.cse.org.uk/news/view/2484</a></a></u></p>	<p>These comments were carefully considered, but it proved too late to introduce major new policies at this point. They would need a lot of research and evidence gathering, and would be likely to lead to a Strategic Environmental Assessment and further long delay in the plan making process</p>	<p>Reference to low carbon homes was included in the Reg 14 draft plan, and policy H3 was added in updated plan, for significant renovations of existing residential properties.</p>
Local resident	issue that really impacts the character of the area. I live roughly	Comment noted	
Local resident	meaningful change!	Comment noted	
	<b>BOUNDARY CHANGES</b>		
Natural England	Neighbourhood Plan poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.	comment noted	
National Grid	comment relevant to the boundary change, but a map was sent which	comment noted	
LLDC	many thanks for consulting the LLDC in relation to the change to the Roman Road Bow Neighbourhood Plan boundary. The LLDC supports the proposed changes to exclude the land that falls within the LLDC area from the Plan. We understand that this was an error in the Plan and we support the approach taken to correct the exact position of the revised designation boundary, amended to exclude TfL's landholding at	Comment noted	
TfL Commercial		Comments noted	
TfL Planning	change. We have no comments to make on the proposed change but	Comment noted	

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Canal & River Trust	Within the proposed Neighbourhood Plan Area, the Trust owns and manages the Hertford Union Canal and their respective towpaths. We also own and manage Skew Bridge, and Parnell Road Bridge, on the Hertford Union Canal. The canals form a key part of the Blue Ribbon Network, and provide important areas for cultural activities, a heritage asset and, increasingly, are a space where Londoners are choosing to live. Waterways can also provide a resource that can be used to heat and cool buildings, a corridor in which new utilities infrastructure can be installed and a way of sustainably draining surface water away from new developments. In celebrated its 200-year anniversary. The canals bring a unique heritage value to the areas they pass through, and contribute to a strong identity of place.	Comment noted	
	We have reviewed the proposed changes to the Neighbourhood Plan area, and have no further comments to make.		
	We would reiterate our comments on the previous consultation,	Comment noted	
Ali MP	correspondence related to the COVID-19 situation and is prioritising	Comment noted	
Concerns	We have received your email, thank you!	Comment noted	
Dance Space	Thank you for your email.	Comment noted	
Local resident	to whom read this I am writing to inform you about the idea of the liveable streets I am a delivery driver and ever since these liveable streets have been set in place you have made life a living hell to get to people's property and on time because we having to walk more further to get to them instead of being on time for them which is a breach of health and safety	Comment noted, but no Liveable Street measures in Bow had been implemented up to the date of this representation (July 2nd 2021)	
Local resident	Bow Neighbourhood Plan for the following reasons: 1. I do not believe that the LLDC should have jurisdiction over land to the west of the A13 Blackwell. The road cycle bridge which crosses the A12 between Old Ford Road and Crown Close into an all-traffic bridge. This would be a disaster for traffic levels in Bow and completely contrary to the support of local people for the Liveable Streets proposals for Bow. 2. The LLDC wants to convert the road cycle bridge which crosses the A12 between Old Ford Road and Crown Close into an all-traffic bridge. This would be a disaster for traffic levels in Bow and completely contrary to the support of local people for the Liveable Streets proposals for Bow. 3. The LLDC opposed plans for affordable housing on the brownfield site behind Wendon Street because the proposals threatened their	The LLDC do have authority accessible bridge was in the LBTH 2017 infrastructure LBTH and Place Ltd	
	bridge between Old Ford Road and Crown Close, oppose the claims of housing on the brownfield site behind Wendon Street.	comment noted	
	<b>ENVIRONMENTAL ASSESSMENT SCOPING</b>		
Agency	covering email said 'We have had to prioritise our limited resource and	comment noted	
Authority	Authorities. As London Borough of Tower Hamlets is outside the	comment noted	

