

# INDEPENDENT EXAMINATION OF THE ROMAN ROAD BOW NEIGHBOURHOOD PLAN

EXAMINER: Jill Kingaby BSc (Econ) MSC MRTPI

Mike Mitchell  
Roman Road Bow Neighbourhood Forum

Marc Acton Filton  
London Borough of Tower Hamlets

Examination Ref: 01/JK/RRBNP

23 March 2022

Dear Mr Mitchell and Mr Acton Filton

## ROMAN ROAD BOW NEIGHBOURHOOD PLAN EXAMINATION

Following the submission of the Roman Road Bow Neighbourhood Plan (the Plan/RRBNP) for examination, I would like to clarify several initial procedural matters. I also have a number of questions for the Roman Road Bow Neighbourhood Forum (which will need to involve the London Borough of Tower Hamlets), to which I am requesting a response(s) **by Friday 22 April 2022**.

### 1. Examination Documentation

I can confirm that I am satisfied that I have received a complete submission of the Plan and accompanying documentation, including the Basic Conditions Statement, the Consultation Statement and the Regulation 16 representations, to enable me to undertake the examination.

Subject to my detailed assessment of the Plan, I have not at this initial stage identified any very significant and obvious flaws in it that might lead me to advise that the examination should not proceed.

### 2. Site Visit

I intend to undertake a site visit to the neighbourhood plan area week commencing 11 April 2022. This will assist in my assessment of the draft Plan, including the issues identified in the representations.

The visit will be undertaken unaccompanied. It is very important that I am not approached to discuss any aspects of the Plan or the neighbourhood area, as this may be perceived to prejudice my independence and risk compromising the fairness of the examination process.

### 3. Written Representations

At this stage I consider the examination can be conducted solely by the written representations procedure, without the need for a hearing. Nevertheless, I will reserve the option to convene a hearing should a matter or matters come to light where I consider that a hearing is necessary to ensure the adequate examination of an issue, or to ensure that a person has a fair chance to put a case.

#### 4. Further Clarification

I have a number of initial questions seeking further clarification from the Neighbourhood Forum (with the involvement of the London Borough of Tower Hamlets), set out in the Annex to this letter. I would be grateful if a written response(s) could be provided **by Friday 22 April 2022**.

#### 5. Examination Timetable

As you will be aware, the intention is to examine the Plan (including conduct of the site visit) with a view to providing a draft report (for 'fact checking') within 4-6 weeks of submission of the draft Plan.

However, in view of the additional information which I have requested I must provide the opportunity for you to reply. Consequentially, the examination timetable will need to be extended. Please be assured that I will seek to mitigate any delay as far as is practicable. The IPE office team will keep you updated on the date of my site visit and the delivery date of the draft report.

If you have any process questions related to the conduct of the examination, which you would like me to address, please do not hesitate to contact the office team in the first instance.

In the interests of transparency, may I prevail upon you to ensure that a copy of this letter and any subsequent response is placed on the Neighbourhood Forum and Local Authority websites.

Thank you in advance for your assistance.

Your sincerely

*Jill Kingaby*

Examiner

## Annex

Having read the submission version of the Roman Road Bow Neighbourhood Plan, the background evidence and the responses from local parties and stakeholders to the Regulation 16 consultation exercise, I have a number of questions for Roman Road Bow Neighbourhood Forum (the Forum/RRBNF), who will need to liaise with the London Borough (LB) of Tower Hamlets.

I have requested the submission of a response(s) **by Friday 22 April 2022**. This should include the suggested Statement of Common Ground below. Should further time prove necessary to respond in full, please advise the IPE office team.

If the Roman Road Bow Neighbourhood Plan (RRBNP) passes examination and achieves support at referendum, planning applications for the Roman Road Bow area will then be determined by the LB of Tower Hamlets in accordance with the development plan for the area, unless material considerations indicate otherwise. The development plan for the Roman Road Bow area will then include the London Plan 2021, Tower Hamlets Local Plan 2019, and the adopted RRBNP. This means that Tower Hamlets will have responsibility for applying the RRBNP policies, when applications for development are submitted in the Roman Road Bow area. To facilitate good decision-making, I have considered carefully the comments made by the LB of Tower Hamlets in its Regulation 16 response to the submitted RRBNP.

In my view, it would be helpful if the RRBNF and Tower Hamlets' planning officer(s) could consider the points raised by Tower Hamlets at the Regulation 16 stage, and construct a Statement of Common Ground (SOCG), setting out where the parties agree that modifications to the Plan should be made or are, following discussion, considered by the Forum to be unnecessary. If agreement cannot be reached, then it would greatly assist my Examination if an additional brief explanatory note could be written, setting out the reasons for disagreement. I list below the paragraphs in Tower Hamlets' response on which I would like to receive further information.

In the paragraphs below, I have also included additional questions based on my reading of the Neighbourhood Plan and the supporting evidence documents, and the responses received to the Regulation 16 consultation exercise.

### **Tower Hamlets' Regulation 16 Response - General Comments, paragraphs 7-12**

My examination focuses on the Basic Conditions for neighbourhood planning rather than minor matter such as paragraph numbers. However, with reference to the London Plan, I consider that the Neighbourhood Plan should be updated to confirm that the final version was adopted in 2021. It would be helpful if the parties, when writing a SOCG, would include comments on paragraphs 7-12.

Figure 2 on Page 12 of the Neighbourhood Plan shows the boundary for Roman Road Bow, but it is very difficult for readers and users of the Plan, especially those unfamiliar with the area, to locate it. Would the Forum be able to prepare a revised map which names some of the important features eg. Roman Road, Victoria Park, Mile End Park, A12 highway, so that the location can more easily be identified?

In addition, Figure 4, Housing Developments is difficult to read, in particular because of the alignment of the key. Could this map also be modified?

### **Objective 1: Thriving High Street and Local Economy**

Paragraphs 14 – 25 set out Tower Hamlets' Regulation 16 comments on Chapter 4, including Policy LE1, the supporting text and Actions LE2, LE3 and LE4. With regard to paragraph 16, I agree that the uses – maker space, cultural or leisure activity and social enterprise - should be defined coherently in

the supporting text. In considering these uses, the Forum could also consider in their response the consultation response from R Roe, Senior Policy Officer, Cultural Infrastructure.

Paragraphs 17 and 22 refer to the Roman Road East District Centre, which is illustrated in Figure 14. I consider that the supporting text to Objective 1 should explain more clearly the position of Roman Road East within the town centre hierarchy for Tower Hamlets, and as set out in Policy S.TC1 of the Local Plan, referenced on Page 34 of the RRBNP. Although paragraph 22 of Tower Hamlets consultation response refers to “other designated town centres”, my reading of Policy S.TC1 and Figure 11 of the Local Plan suggests that there are no neighbourhood centres or parades within the RRBNP area. Perhaps this could be clarified?

Given the importance of The Roman Road Market to the area, as described in paragraph 2.1.1 of the RRBNP, should the Market and its future be mentioned, and a brief description given, in Chapter 4 (Thriving High Street and Local Economy) of the Plan?

### **Objective 2: Green Streets that Encourage Walking and Cycling**

Chapter 5, with Policy GS1, Action GS2 and supporting text, is covered by paragraphs 26-29 of Tower Hamlets Regulation 16 consultation response, and I would welcome comment on the points raised in a SOCG.

In addition, I consider that the readers and users of the RRBNP would be assisted if the supporting text (in paragraphs 5.1 and 5.2) briefly explained the area’s context in terms of transport infrastructure and the position of Bow within London’s transport network. The importance for through traffic movements on the A12, A11 and A1205 should be acknowledged. In addition, the Tower Hamlets Local Plan’s Figure 17: Strategic transport connectivity, shows the rail, tube, road and cycle infrastructure which is present in the Roman Road Bow area. The objective for green streets that encourage walking and cycling will have to address the problems, such as traffic congestion and air pollution, which stem from the existing transport network and from the area’s proximity to Central London. The importance of deliveries and servicing to businesses in the District Centre could also be referenced. Could additional information on these operational matters be added to strengthen Policy GS1?

Policy GS1 implies that all development is required to enhance the pedestrian and cyclist experience. Whilst this might be beneficial, I consider that it could be too onerous for small developments (eg. modest house extensions) and out of line with national planning policy. Should the policy be modified to take account of this?

A number of respondents to the Regulation 16 exercise commented on Policy GS1 and transport issues. Transport for London (TfL) sought reference to the Mayor’s mode share target, Healthy Streets Approach, and Vision Zero for road safety. In my view, it would be unnecessary for the RRBNP to repeat strategic policies, but should an extension to the supporting text for Policy GS1 be made to refer to these measures?

TfL also commented on School Streets and scope for converting off street and on street parking space for more beneficial uses, and on Action GS2. What is the Forum’s view?

C Clark and J Ives expressed frustration that cyclists and pedestrians were classified together, as they may have conflicting interests; they put forward a number of proposed changes to Chapter 5 of the Plan. The Canal and River Trust commented on the towpath through Mile End Park and suggested some towpath widening. C Jankowski put forward a number of suggestions relating to Green streets that encourage walking and cycling, beginning with a connection from Fairfield Road/Polydamas Close to the Four Seasons Green Park. Should any or all of these Regulation 16 responses lead to modifications of the Plan?

### **Objective 3: Beautiful Public Spaces**

Chapter 6 includes Policy PS1: Enhancing public realm spaces, Policy PS2: Designating Local Green Spaces, and supporting text. Tower Hamlets' comments are included in paragraphs 30-33 of its Regulation 16 response. Please would the Forum address all the points raised, in particular the accuracy and legibility of Figures 21 and 22, and whether or not all the proposed Local Green Spaces meet the criterion for designation of being demonstrably special.

The Regulation 16 response from N Palit put forward proposed modifications to Policies PS1 and PS2. The Canal and River Trust suggested that green spaces for improvement should include Mile End Park. Should modifications to address these points be made?

### **Objective 4: New Life for our Local Heritage**

Chapter 7 addresses this objective, with Policies HE1 and HE2, Actions HE3 and HE4, and supporting text. Paragraphs 34 to 38 of Tower Hamlets' Regulation 16 response include comments on this Objective.

In addition to the concerns raised by Tower Hamlets, I find the map on Page 59 difficult to read. Would the Forum be able to replace it with a new map which shows the names and boundaries of the Conservation Areas which have been designated within the Neighbourhood Plan area, and a revised key which explains why the purple buildings have been highlighted?

The Canal and River Trust was critical of Policy HE1: Bow Wharf. What is the Forum's response to the alleged lack of general conformity with the Local Plan?

### **Objective 5: High Quality Affordable Housing**

Policies H1, H2 and H3, and supporting text are included in Chapter 8. Paragraphs 39 and 40 of Tower Hamlets' Regulation 16 response seek more information and modification to Policies H1 and H2. N Palit also requested more supporting information. Should the Plan be modified in response, to meet the Basic Conditions for neighbourhood planning?

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

Policy CF1, Actions CF2-6, Priorities for Community Infrastructure Levy (CIL) funding and supporting text form chapters 9 and 10. Paragraphs 42 – 48 of Tower Hamlets' Regulation 16 response set out some queries and suggestions for modification. Should the Plan be modified in response, to meet the Basic Conditions for neighbourhood planning?

### **Other Matters**

Thames Water submitted comments on Water and Wastewater Infrastructure and proposed additional text for the RRBNP. In addition, MMO Marine Planning and Marine Licensing requested a reference to its South East Marine Plan. What is the Forum's response to these?