|  |  |
| --- | --- |
| Ben Priestly | Here are my comments on the draft Neighbourhood Plan for Bow:**Objective 2, page 42:** the Liveable Streets proposals for Bow are currently paused as a result of TFL raising concerns over the impact of the proposals on traffic flow on the A12 and on bus routes particularly Grove Road. If the Liveable Streets proposals are watered down, and/or not implemented by the Council, it will make all the aspirations in the Neighbourhood Plan that Bow should have ‘green streets for walking and cycling’ simply impossible to deliver. The Mayor of London has recently raised alarm over the return of car use to pre-pandemic levels, with all the implications that this has for the health and wellbeing of Londoners, yet TFL is holding up the implementation of Liveable Streets for Bow! I would like this contradiction to be acknowledged in the Plan with a clear call for the Liveable Streets Bow proposals to be implemented as were supported by a clear majority of those responding to the original consultation with residents.**Objective 2, page 46**: the Plan should make explicit an objection to the proposals by LLDC to convert the Old Ford Road/Crown Close pedestrian/cycle bridge into an all-vehicle bridge. This is in the LLDC plan for Fish Island and represents one of the most serious threats to Liveable Streets in Bow. The Plan should acknowledge this threat and oppose it. No-one seems to be willing to tackle this issue! |
| Bill (no surname provided) | The term Bow is slightly misleading as parts of the neighbourhood fall into Old Ford as opposed to just Bow. Surely renaming it Old Ford Bow Neighbourhood Forum/Plan/Area would be more geographically correct then what this is suggesting? Even Tfl aknowledge the areas north of Roman Road as Old Ford and not Bow. Surprise this has been looked over for so long. |
| Camilla Lecznar  | Please find my comments on the plan:Specifically I would like to comment on the Caxton Hall Community Centre proposed development next to Four Seasons Green. I would like to raise the issue of the community facilities that will replace Caxton Community Hall and current sports facility if the proposed development goes ahead. I would like to highlight the importance of community facilities in this location including sports facilities which are in short supply in this area and emphasise the importance of not losing community facilities should any development take place. Furthermore I would like to emphasise the valuable nature of adjacent Four Seasons Green as a actively used local green space and the special wildlife it supports next to a trainline with the trees and shrubs that surround it. Any proposed development should be sensitive to this unusual wildlife habitat. |
| Christina Koch | I just read through the neighbourhood plan and I am delighted to see the results.As a disabled community member and wheelchair user my radius is small and I am deeply connected to what is happening right by my doorstep. My Only addition would be that I would love to not only see Mile End but also Bow Road become step free. That would make a world of a difference. |
| Christoph Jankowski | I would like to contribute some thoughts and suggestions to the Neighbourhood Plan. I would also like to voice my support for the Liveable Streets initiatives and express my concern that the ambition of some of these appears to have been vastly scaled back, or implemented only half-heartedly (or without proper oversight), to the point of being ineffective and useless. Please could the level of ambition be maintained to make Tower Hamlets, and in particular the Roman Road and wider Bow areas a safer and healthier place to live, work and study in. 1. Create a connection from Fairfield Rd/Polydamas Close to the Four Seasons Green park at the end of Malmesbury RoadCreating access between the Four Seasons park and  Fairfield road via Polydamas Close (currently an overgrown steep bank at the back of a housing development) would give pedestrians and ideally cyclists a safe way to travel East<>West between Bow East and West without having to cycle/walk along the dangerous and heavily polluted Bow Rd or Tredegar Rd which are currently the only possible routes.This would provide much safer and better access for the school and nursery age children who live in Bow East and go to school in Bow West (Malmesbury Primary School etc). It would also connect neighbourhoods which are segregated by the railway lines and create a green and quiet link between Grove Hall, Four Seasons and Tredegar Square parks. The distance between the edge of the park and the end of Polydamas close is currently approximately 25 metres and lies along a bank. The bank could easily be transformed into an accessible ramp allowing pedestrians, pushchairs and bicycles through. A way would need to be found to give public access to a section of Polydamas Close which I believe is Council property. Suggested cut-through(suggested cut-through in yellow)**Suggested cut-through**(suggested cut-through added in purple - high pollution roads in red, quiet roads in green, enlarged from the MoL/Tower Hamlets 'Clean Air for Kids' campaign map, 2019 - attached)2. Speeding and enforcement We have been suffering, across Bow, from dangerous and antisocial driving, mostly in the form of speeding. Most roads are limited to 20mph but this is roundly ignored by most drivers. If the council and the police cannot enforce this, then it begs the question what the point of these speed restrictions is. We've had several near misses on Fairfield road especially, with buses (488 and 276) as well as cement HGV cutting through from Bow Roundabout/A12 regularly speeding up the road (limited to 20mph) and not stopping at the pedestrian crossing in front of Phoenix SEN school, or dangerously overtaking cars or cyclists.This creates an aggressive atmosphere on the streets and strongly discourages cycling. It also leads to increased noise and pollution and contributes to a sense that the car is king and that cyclists are only borrowing cars' roads.3. Clean air and anti-idling campaignsThere have been a number of campaigns run by Tower Hamlets on awareness around clean air and against idling and cutting down on car use. For example, the excellent campaign website [cleanairforkids.org](http://cleanairforkids.org) from the 2019 campaign has been archived and is no longeraccessible which feels like a great shame considering all the work that went into the campaign. The information and the visuals are still highly relevant and would make good assets for regular re-use. However, enforcement against idling has been minimal to non-existent in Bow. Raising awareness is important, and should be done on a continuous basis, not just in campaign spurts, but if this is not matched with enforcement then results will remain very limited.4. More provision for cyclists, pedestrians and people with accessibility needs- Tower Hamlets council has teamed up with Cyclehoop bike hangars which offers, for about £70/year a secure on-street a secure space to store bicycles (some London boroughs subsidise these to make them free to residents)Our closest bicycle hangar has a wait list of 47 which means there is huge demand for secure bicycle parking. Considering the rates of bicycle thefts in the borough, it would seem there really is an issue of high demand and under-supply of secure bicycle parking. If Cyclehoop doesn't cost the Council any/much money, then surely it would be feasible to significantly increase the number of bike hangars. And the fact that they might at times take up existing car parking spaces should be seen as a good thing.- Many housing estates are less accessible to bicycles (no dropped kerbs, fencing barriers making it difficult for cargo bicycles, or bicycles with trailers to pass) meaning cyclists seeking 'quiet routes' need to use busier roads to navigate through the borough. There are still too many pavements managed by housing developments which do not fulfil basic accessibility needs in terms of dropped kerbs and safe crossing points. The council needs to work with housing developments to bring these up to par on all types of  accessibility. I would be delighted to be contacted for further conversations on how to make this one of the best neighbourhoods in London. |
| David Field  | Thanks for the reminder to comment. My main comments would be around chapter 2. Good to see the emphasis on sustainable travel however the document is lacking on improvements for bus journeys. For instance bus lanes on the A11 Bow Road would better connect the community east west. There could also be improvements to bus stops and reviews of stopping and loading activity on roads such as St Stephens Road, Roman Road and Parnell Road where parkIng often delays buses. Links between Roman Road and QEOP via bus are also poor and could be improved.Many Bow residents rely on bus services, particularly older, disabled and low income families These voices are not often heard or represented in such consultations where the voice of motorists or cyclists can often be heard loudest.Please make sure that bus users are represented in this plan |
| Debra Fullerton | Get more decent shops Or stalls for mature people, nothing at all for me to go there for , new shops, we need decent changing rooms and toilets! Plus less coffee shops! Large sizes for women and men instead of cheap Small clothing for children. I can't even buy a winter hat, I have go online for this. The market for poor, with no quality or choice at all for any older people!!! More vegan shops! We need a marks and Spencers and a range of accessable shops for all! The 1980s was the best time for this market... |
| Gary Colclough | Dear Neighbourhood planning teamI am a Bow East resident and have lived in the area for for over ten years and are bringing up a young family with two primary aged children in the area.I wanted to feedback keen support from myself and my family for greener safer streets.We try and walk and use public transport in the area but find walking around and the area with our children, often unpleasant and hazzerdous with roads where traffic is eitehr congested or driving too fast. I would not even consider letting my kids cycle on the streets in Bow. We strongly support anything that wil makes the streets more accessible, safer and more welcoming for our children. We would also be much more keen to spend time supporting local businesss aroudn Roman Road if it was greener, and the surrounding roads felt calmer and safer. We enjoy spending time on pediastrian friendly streets. |
| Joan Griffiths | Many thanks to  those residents who developed this plan. Here are my suggestions:Objective 2 Road SafetyThe Mile End crossroads traffic lights need to be timed to respect the safety of local pedestrian families much more, instead of the exremely high priority now given to through traffic to & from central London & North/SouthThe right turn from Burdett Road  to Mile End Road eastwards needs to be restored as already long ago promised, in order to prevent frequent U turns in residential stretches of Grove Road by traffic seeking a left turn to the east.Objective 2 p.44-47 CyclesMore pavement Cycle Sheds need to be widely available to prevent the serious fire hazard of cycles in terraced house hallways, and prevent thefts from flat balconies.Objective 2 p.46-49  Mile End Tube AccessStep free access is needed as soon as possible, and meanwhile seating is needed in the Ticket Hall for the elderly, heart patients and pram pushers to get our breath back before climbing another set of stairs to street level.Objective 3 p.49-53 Green SpacesThe Holy Trinity Churchyard, Morgan Street E3 5AT development into a small public park by local residents & the Epainos  Church is to be much supported.Objective 4 HeritageDevelopment of Pubs as places for community interaction & cohesion needs  the involvement of  the  large proportion of our residents who may avoid  alchohol for religious reasons in planning for inclusion. |
| Joaquin Alba  | To Tower hamlets planners,I agree with the Neighbourhood Plan for Roman Road Bow, specially with the pedestrianisation of the streets and the projected plans to encourage cycling.  |
| Johnny Seymour | Love the plans - area will really benefit from some development like this.More greenery and trees on Roman Road Market would be fantastic.I cycle in the area and find most roads unsafe compared to a lot of other London areas. Any additional lanes or traffic calming (particularly on Parnell Road) would be much appreciated. |
| Matt Hewitt | I'd like to register my support to the Bow neighbourhood plan, overall.I'm particularly supportive of policy GS1, improving safe walking and cycling routes.But I have three concerns.Firstly, 5.1, the 'summary of current issues', which currently reads:"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. It is likely that more people would walk and cycle if there were attractive routes through green areas away from main routes."This abdicates responsibility for improving walking and cycling conditions on \*main roads\*, roads which go directly where people actually need to go, and boast the majority of the shops and services people need to access.I suggest rephrasing to:"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. It is likely that more people would walk and cycle if motor traffic volumes and speeds were reduced on main roads, and improved, continuous walking and cycling infrastructure installed."For similar reasons (i.e. supporting active travel on main routes, not just in parks), the introduction to policy GS1 should read:"...enhance the pedestrian and cyclist experience both with high-quality dedicated, protected infrastructure suitable for ages 8-80 on busy main roads, and by improving pavements, cycle routes, cycle storage, access through public spaces and wayfinding away from busy main roads and key routes in support of School Streets. This shall be..."My final concern is point 3 of GS1: "Changes to the highway that remove black taxi access will not be supported."I am concerned that this line could inadvertently:1) prevent modal filters such as planters being used to introduce low traffic neighbourhoods, which are proven to cut rat-running traffic from residential streets and improve safety on such streets for people walking and cycling2) prevent any future plans to improve bus service reliability and the safety of people riding bicycles in bus lanes by removing black taxis from themI suggest a phrasing of point 3 of GS1 that actually enables the vision of improved walking and cycling conditions ought to be:"Changes to the highway that remove black taxi access will not be supported unless an alternative route to their destination exists." |
| Matt Hewitt | One other thing:It would be great in the walking and cycling section to specifically mention the community desire for a footpath linking the park at the end of Malmesbury Rd to Fairfield Rd in the vicinity of Polydamas Close.This would create a useful and safe east-west link through Bow. |
| N Palit | I am writing in response to the regulation 16 consultation on the RRBNDP. I could not see any clear guidance on the LBTH website as to whether there were any specific requirements for this stage of consultation, (i.e. akin to Regulation 19 consultation for Local Plans). Therefore, I hope these comments are useful and relevant.  My comments on the proposed draft policies as follows: * **Policy PS1 -** suggest the insertion of the word 'including' before 'housing estates' and after 'similar environmental measures' - so as to make clear that green space / public realm improvements in other locations would also be supported.
* **Policy PS2 -** suggest the addition of the following at the end of the policy. 'Major housing developments located within 200m of the boundaries of each green space will be required to provide contributions to maintain and enhance the space' (if this is not already covered by LBTH Local Plan policies.
* **Policy HE1 -** suggest insertion of 'and representative' after widespread.
* **Policy HE2 -** suggest the justification text is made stronger, clearer and more robust. The justification does not make explicitly clear why these public houses should be designated as local heritage assets. Is it to try to prevent the loss/conversion of these pubs, or is to ensure that the architectural interest is retained if they are converted?
* **Policy H1 -** Does the policy need to explicitly state an approximate quantum of housing that might be considered acceptable on the site? It is acknowledged the site has an extant permission, and is therefore likely to be built out in line with that, but should this lapse some guidance within the policy may be beneficial.
* **Policy H2b -** What is the definition of a community-led housing organisation? Is there a list of these contained within an appendix of the Neighbourhood Plan, Local Plan, or on the LBTH website somewhere? Does this need to be made clearer? Is a definition contained within the glossary?
* **Policy CF1-** Suggest insertion of 'Assessment of need of U-16s should be clearly disaggregated by gender, ethnicity and other relevant protected characteristics, with proposals demonstrating how need of each intersection of the overall under-16 population is met' after 'demonstrate that they have assessed the likely needs of the new resident under-16 population, and have sought, where possible, to address these needs.'

With regards to the actions, I have no specific detailed comments on their content. However, I do request that LBTH feeds the proposed actions into the upcoming Local Infrastructure Fund list of projects for the Bow area (where appropriate) if this has not been done already. I do not believe any of these projects were previously listed in the LIF consultations.  |
| Peter Schradt | The area has a number of green spaces, these could benefit from landscaping/streetscaping that links them together to maximimise their benefits.Much more investment needs to made on cycling and walking infrastructure. Cars have far too much priority at present. There are regular queues of cars clogging up the roads and junctions of the area, belching out noxious fumes which in turn discourages pedestrians and cyclists.There needs to be much more urban landscaping – trees, greenery, seating, for residents to have the spaces and opportunity to enjoy the outdoors. These need to link up with the existing parks and community spaces and businesses (shops, bars, cafe’s restaurants, etc.)Roman Road currently is just awful to spend time on from a pedestrian, shopper, or exerciser’s perspective. Making it more pedestrian friendly by restricting car traffic (like on Roman Road Market on certain days) might help invigorate businesses, encourage physical activity, and bolster community interaction by encouraging people out of their homes, and to spend longer periods outside enjoying pleasant facilities (of which there are not enough).The streets of the area generally feel scruffy and unloved. Some nice community amenities, street furniture, landscaping, greenery would go a long way to create a sense that residents are valued, and cared for –  fostering community pride, and wellbeing.There are no public toilets, the one at the carpark at the end of Roman Road market appears to have been removed. People are more likely to venture outdoors and spend longer out, socialising or shopping if they can be confident that such facilities are available. The history of the area (so important in making a place unique and interesting) needs preservation and highlighting. Whether it be historic buildings, sites or places of interest, these are being ignored and allowed to fall into ruin. They need to be preserved and woven into the fabric of the area to engage and inform residents – hopefully creating a sense of belonging and community. People might feel that there’s something special about where they live, that they’re connected to the history of their neighbourhood.It’s not enough to save the best historic buildings by turning them into gated private housing – this creates division. Prominent public buildings or institutions if being converted into private residences need to have some public components so the rest of the community doesn’t feel shut out. |
| Simon Levey | I give my support to the Bow Neighbourhood Plan.With regards to any further suggestions for consideration, I submit the following thoughts:Action LE4:[LBTH Strategic Plan 2021-24](https://www.towerhamlets.gov.uk/lgnl/community_and_living/community_plan/strategic_plan.aspx) (slide16):"We will support access to roles in hard to fill sectors or those areas where job supply will grow or remain strong, for example the green economy which will support our objectives to mitigate climate change."[Tower Hamlets Further Education bursaries](https://www.towerhamlets.gov.uk/further) could be directed towards supporting necessary jobs in zero-carbon sector, such as design & installation for insulation, glazing fitting, heat pumps, etc. (Neighbourhood Plan, Policy H3 - "This includes the sensitive retrofitting of energy efficiency measures in historic buildings - including the retrofitting of listed buildings and buildings in Conservation Areas - provided that it safeguards the historic characteristics of these heritage assets"), as well as civic planning, arboriculture, horticulture, biodiversity and conservation, which could be achieved in partnership with colleges and schools trusts.Objective 2:LBTH Strategy 2021-24 Outcome 4 highlights the importance of "Residents feel they fairly share the benefits from growth and inequality is tackled", although it notes as outcomes "Proportion of the population who live in low traffic neighbourhoods, Residents engaged with initiatives which contribute to reducing air pollution" (Slide 31).In the Centric Lab's recent report '[*Equitable Urban Mobility*](https://www.thecentriclab.com/equitable-urban-mobility)', the authors "encourag[e] all those working in planning and policy to think ecologically and in an ecosystemic way to help bring forward equitable modes of transport that keep people and biodiversity healthy."The expert authors of the above report urge better engagement with residents who are least privileged in order to secure a robust and holistic response to the challenges - in order to devise whole-system solutions that rectify inequalities rather than exacerbate them - no matter how well-meaning.This should include more than just digital engagement, as LBTH Strategy 2021-24 notes : "Achieving digital inclusion in Tower Hamlets is also an essential element in creating a fairer society in terms of both money and jobs and there has never been a better time to help residents get online.   However, we know that some people, particularly the elderly, BAMEs, people with disabilities, and those living in social housing do not have the same access as others." (Slide 25)On mobility, perhaps the Neighbourhood Plan could proactively seek ways to  support those in the greatest need for mobility, such as disabled, small businesses, people who rely on ailing and unreliable public transport. Local [Mobility-as-a-Service](https://www.gov.uk/government/publications/mobility-as-a-service-maas-acceptability-research) (community/council-provided or means tested) scheme, Mobility scooters provided by 1st Step Mobility on Roman Road to replace Blue Badge holder cars, perhaps? Objective 5:"A huge part of London will be underwater by 2050, new data has revealed. The terrifying climate forecast predicts areas in the city that will regularly fall below sea level in 30 years' time. The research, from Climate Central, a US-based news organisation, claims the risk of flooding could be three times higher than previously predicted." reports [My London News](https://www.mylondon.news/news/zone-1-news/see-your-street-underwater-2050-17212413) (July 2020).Map of possible impacts of climate changeAreas underwater in 29 years (according to modelling) include parts of Bow, which suggests this Objective should also include flooding protection for new and existing housing, and absolutely no building on natural flood defences, such as river banks, marshes and low-lying areas - even if this means access for developers to 'cheap' land.Tower Hamlets Plan 2031 Policy D.ES4 Flood Risk (Please refer to the plan for an overview of flood risk in Tower Hamlets). |
| Mrs A Wakerley | I have been to a couple meetings over 2 years ago and heard nothing really since. What i have noticed that things are going ahead with out quite a few people still not knowing. Are you trying to bring in under cover while we are coming out of covid and using it as a cover? I have not seen or told what is exactly what is planned only several ideas. I fill like because i am only a business owner, 70 years of serving the community, we are not needed and ignored. I have to guess what is planned. I feel the shop has no future in this area now, Slowly being pushed out by fast food shops, estate agents and coffee shops.The reason for the lack of business in roman road it a badly run market and lack of communication and help with fun days etc which should involve the whole market and its surrounding businesses.The litter every where. Yes the footfall has dropped but people were driven away with parking restrictions, lack of parking and lack of all transport serving the area.I am sorry i cant say more at this time but i feel at least i responded. I only got this message this morning on my email. I wander how many businesses  got this message? |
| Carolyn Clark | We took a lot of trouble to comment on th Neighbourhood Plan but were ignored (or 'noted'). We have looked at Version 16 and are sending revised comments to you in the hope that they will not be ignored in the same way.Objective 1: Thriving High Street and Local EconomyNighttime Economy: We are very concerned by naïve plans to develop a nighttime economy around the Roman Road as we remember the problems caused to local residents, and the police, with Weatherspoons and Bar Risa which both had to be closed. We also experienced the nighttime economy develop in Shoreditch in the 1990s, and the disbenefits to local residents who did not get jobs but had visitors pissing in their doorways. Restaurants have been developing at about the right pace of change but the impact on shop rents will be detrimental if a night time economy develops. We fully supporting measures proposed to preserve local pubs. The Market/Shopping: We don’t agree that there is not a variety of shops in the Roman Road. There is very little we cannot buy in the Roman Road, and always at a fair price. Notably, the market has several stalls and shops with shop and mail order returns which makes it very sustainable by reducing land fill. We share concerns about the number of estate agents and betting shops.The Plan says disparagingly of the market ‘while popular with some residents’. We include ourselves in ‘some resident’. The market is popular with those who want and, in many cases. need a market which suits their pocket. We know it is not popular with those who want handmade soaps, scented candles and endless coffee shops. It is insulting to hear the market described as ‘messy’ – we do not want a sterile space appealing to people who are already amply provided for in Lauriston Road and Broadway Market. The Plan should praise, instead of criticise, how remarkable it is for a local London market to run three days a week. Changes to the streetscape run the risk of gentrifying a traditional gem unless very thoughtfully planned and engaging the traders. Furthermore, while there are closed shops, there is also a turnover allowing businesses access to affordable rent retail outlets to try different things and start-up businesses. The plan needs to acknowledge that very few shops premises are empty for long periods, which gives another perspective on the issue to that presented that there are loads of empty shopsThe 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 and regional resource. Furthermore, the car park is an ideal location to put in increasingly vital electric charging points.Light Industry: Support for local training/apprenticeships and work placements is great. Need more workplaces to back this up. It isn’t clear where the shared workspace is going to be and whether this is a bid to change the use of shops. This would need to be kept in check. We don’t know what the E classification is but hope the Plan will enable workshops which make tangible things rather than just desk space. Manufacturing should be welcomed back to the area and facilitated to provide much needed jobs. This means spaces to be planned in/designated now.Objective 2: Green Streets that Encourage Walking and CyclingWalking: We are frustrated by cyclists and pedestrians classified together. While the plan says the Towpath is ‘an important cycling route’ it should acknowledge it is also an essential pedestrian route. Pedestrians and cyclists often have conflicting interests e.g. cycle lanes behind bus stops. on park paths, the use of pavements and zebra crossings. Canal towpaths are a good example of this conflicting interests as they 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. Electric scooters etc: The Plan makes no mention of electric scooters/bikes/ skateboards etc which are on the increase and can go extremely fast in public spaces. This will grow as a national issue, but the time is now to consider the pros and cons and adapt the infrastructure accordingly.Electric charging: More and more vehicles are and will be electric during the period of this Plan. Already, we see electric charging wires across pavements from peoples’ homes which are a hazard, particularly to people with poor eyesight. There’s also hydrogen emerging as a greener fuel. The plan seems to only recognise vehicles as pollutants and not as essential for many people and purposes. The plan should identify places for electric chargers and consider access to hydrogen outlets, if this takes off. Street Clutter: The reduction of street clutter is very welcome but seems to be contradicted by ‘well signed footpaths’. It is certainly contradicted in practice in recent months where Riney vans keep arriving with a new sign. As pedestrians, we don’t need signs in our local area to tell us our routes. There are many factors affecting routes, such as crime. There are certain (and increasing number of) streets we avoid especially at night, which no sign will pick up.Community Safety: Crime is a problem across Bow. The plans re streets and open spaces do not pay enough attention to what happens after dark, and community safety. Some schemes seem to design in crime rather than designing it out. The Plan is too light on safety. This also applies to Objective 3.Mile End Station: Step free access at Mile End would be wonderful.Unaddressed Pollution: There is an issue about diesel pollution from those canal boats which use diesal engines as a power generator and often run their engines for very long periods of time, belching out pollution. On top of this, several use wood burning stoves. If they were cars, many boats would fail the MOT on grounds of pollution.Objective 3: Beautiful Public SpacesPolicy PS1 suggests specific open space creation/improvement. These seem to have the support of the residents affected and will be welcome. However, there is at least one measure being considered by the council which was not put forward in the during the Plan’s development: the pocket park/closure of Chisenhale Road which has been changed from a temporary Covid 19 emergency measure to an ‘experiment’. The Plan should make it clear that such developments must be justified and supported by the majority of those directly affected. Furthermore, the impact of Liveable Streets will be significant. Until this has settled down and both intended and unintended consequences become clear, the promotion of further pocket parks beyond those in the Plan should be resisted.Same comment as above about the use of bikes and electric vehicles in our parks. They are dangerous and too many ignore the ‘slow’ signs for cyclists. Better measures are needed to address the problem.Objective 4: New Life for Local HeritageConservation Areas: The main objective is much needed, but the Plan must specifically include the full protection of local Conservation Areas which are constantly being challenged and eroded. We could see no reference to the Conservation Areas which are so important in Bow. The ‘Outstanding Driffield Conservation Area’ is not just the houses, the school and the factory but also the street scape – the rhythm of the street. Excess signage and changing the street pattern destroys the heritage as much as removing railings. The Plan should clearly state that the street scape in Conservation Areas will be protected and resist the unnecessary intrusion of pocket parks, especially when surrounded by a choice of park space five minutes’ walk away.Heritage Assets: Too many local heritage assets have been allowed to disappear. Including pubs, so their designation as local heritage assets is great. Heritage should include keeping shops as shops and resist conversion to residential and office space. If the Market is not already designated as a local heritage asset, it should be.Bow Wharf: Similarly, the proposals for Bow Wharf are welcome but we hear there are plans to build a high rise in the middle of it which should be rejected. The state of the chimney in Bow Wharf should be included: the fibreglass replacement is now a done deal, but it has inevitably faded in the sun. We understand that the mobile phone operator want to move the mast to Lakeview House. There should be a requirement for the mobile phone mast operator to replace the bricks on the chimney and restore it to its original state as an integral part of Bow Wharf’s heritage. The Heritage Trail update should include podcasts of local people’s memories of the area.Objective 5: High Quality, Affordable HousingIt’s difficult to see what is tangibly proposed in this section – probably understandable as so much policy is at a national level. Affordable: It would be good to see a local definition of affordable as too many new developments claiming to be affordable are way beyond the means of people most in need. The measures are laudable, but many more powers are needed – we recognise this is a national issue. All publicly owned land should be registered so when and if it were available for development, it is used to serve those most in need. The plan should seek to prevent those social housing landlords who sell off their ‘valuable’ housing stock, i.e., houses in Victorian terraces. Those who rent should have as much a chance to live in them as those who buy. Homelessness in Bow is too often hidden. More housing is an obvious answer. But so is consideration of provision for people who are single and homeless, so they do not have to leave the area that is their home. This means both accommodation with tailored flats for their needs and the necessary support services. St Mungos and or Thamesreach should be used rather than trying to establish a council team or Housing Association team that will not have the necessary experience and understanding. The Plan should be clear who and how flats for street homeless people will be provided.Objective 6 Resilient and well-networked community infrastructureChisenhale Studios: The proposal in CF2 to retain and repair the Chisenhale industrial buildings and wharf is very welcome, as is the support for the existing use of the buildings. The wharf would be a good location for a Youth Boat Club such as Laburnum Boat Club in Hackney) This would link well with the Adventure Playground and help solve the shortage of youth provision as well as provide a training function and enabling good health. Or it could be use by Chisenhale School if they need more playspace rather than a tiny space in the middle of an Outstanding Conservation Area.Consortium: Often the most valued grass roots community organisations are run by volunteers. They do not have the time or energy or love of meetings to get into networks and are often disadvantaged as a result, notably access to funding, being in the ‘in-crowd’ with decision makers. The network can become hungry for funding to run itself. Community development is a far more effective method, and we urge a change in approach. This model will also ensure community centres are better used.GENERAL - COMMUNICATIONSThere is an over reliance on social media for communication. The original consultation events were poorly attended. We didn’t even know there had been one in Chisenhale and the electronic submission of comments poorly designed and operated. When we speak to neighbours, many are not aware of the plan at all yet the consequences, including unintended consequences which are naively or perhaps deliberately not thought through, will affect us all. |
| Canal and River Trust – Claire McLean | Dear Plan Making Team,Proposal: Roman Road Bow Neighbourhood Plan Regulation 15Thank you for this recent consultation.We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.Our waterways, including the adjacent towpaths, provide important areas for recreation, biodiversity, sustainable transport (with a related air quality benefit), business, tourism, a focal point for cultural activities and, increasingly, a space where Londoners are choosing to live. They can also provide a resource that can be used to heat and cool buildings, a corridor in which new utilities infrastructure can be installed, a way of sustainably draining surface water away from new developments and providing non-potable water. We would welcome on-going engagement with the Council and developers about the wide range of opportunities that our waterways provide.Within the Roman Road Neighbourhood Plan Area boundary we own and manage the Hertford Union Canal and , and their associated towpaths.The canals have an important role in the history of the area and are key pedestrian and cycle routes and green spaces. London has also experienced a rapid growth in the number of people cruising the waterways and living on boats.We have the following specific comments to make on the plan: The Trust is supportive for the overall aim to improve streets for walking and cycling as one of the key objectives of the plan. We would suggest this should also look at the towpath routes and how these could be improved to support this aim. In particular, through Mile End Park, where the towpath comes under significant pressure with high volumes of visitors, which creates wear on the adjacent verges. Towpath widening into the park could be explored to address this.We support the Beautiful public spaces policy but note that the list of green spaces for intended improvement does not include Mile End Park. We would suggest that this should be included as part of the plan, to try and address some of the anti-social behaviour that is noted as happening along the canal and within the park, and to make these spaces feel safer and more welcoming. Policy HE1: Bow Wharf With regard to the criticism of the first Bow Wharf development, we are not aware that an assessment has been provided by the Forum that advises that the scheme has weakened the link between Victoria Park and Mile End Park. Any plans for the site would be subject to Policy D.EMP2 of the Local Plan, which requires 10% affordable workspace within major commercial and mixed-use developments for affordable workspace if they are considered to be a major commercial or mixed use development. It would seem premature to conclude that this will be the case at this site, given that plans for the site have not been worked up, and it is not subject to an allocation. There is no evidence included to show that the Forum has considered the impact of going beyond the requirement in D.EMP2 on viability, the impact on the achievement of housing policy targets (SH1) in the Local Plan, including affordable housing, and the consistency of the proposed policy with paragraph 34 (Developer Contributions) of the NPPF. As such, this element does not appear to meet the basic conditions for adoption.  |
| GLA Culture and Creative Industries – Rachael Roe | **Representation Reg 16 Roman Road Bow Neighbourhood Plan**The following is an officer response from the Culture and Creative Industries Unit and 24-Hour London team regarding the Roman Road/ Bow Neighbourhood Plan. It references both GLA London Plan Policy and Cultural Policy and other supporting strategies and research documents. I am also attaching our initial response from April. We welcome reference to the supporting research that we highlighted. The following additional points are made in support of the plan.**Objective 1: Thriving high street and local economy**The Neighbourhood Plan notes the poor occupancy of units and their high rent and rates. The recognition that makerspaces, cultural or leisure activities could play an important role in diversification of the high street supported by the recent use class change is welcomed. This aligns with the work of the GLA and London Councils in delivering the High Street for All Mission supporting [London’s COVID 19 recovery](https://www.london.gov.uk/coronavirus/londons-recovery-coronavirus-crisis/london-recovery-board). Organisations such as [Hypha Studios](https://hyphastudios.com/meet-the-team) and [Meanwhile Space](https://www.meanwhilespace.com/) offer managed, curated rates mitigation models for meanwhile use that could support this kind of placemaking approach. There are also a range of cultural operators who regularly utilise meanwhile space as part of their business model. [Guidance](https://lep.london/flexible-workspaces-our-high-streets) commissioned by the GLA and the LEAP following the advice of the Mayor of London’s Workspace Advisory Group, also provides direction on how workspace can be brought forward through the repurposing of existing high street buildings. The GLA culture team can advise further as the plan moves to implementation.**Objective 4: New Life for our Local Heritage** * Bow Wharf could also be considered as a potential cultural asset and for affordable creative workspace. For example, the second acquisition of the Creative Land Trust convert Alice Billings House in Stratford, formerly on the Heritage at Risk register into 30 studios for creatives in the visual, performance and digital arts, designers, and craftspeople. Recommendation: addition of the word culture to this sentence.

*Development proposals must provide for an appropriate mix of uses that include leisure, culture and recreational activities and affordable workspaces for small businesses.* * We welcome the acknowledgement of the potential for pubs to become community assets. They are a cornerstone of the local economy, and a key part of the local economy, both at night and during the day. We would recommend that the planning and licensing departments work in close collaboration to facilitate innovative new pubs to come forward, as stated in the cited Pubs in Tower Hamlets Evidence Base Study. Additionally, and recognising the historical value and significance of some of the buildings, the council could look into some of the [funding opportunities for Culture and Community Spaces at Risk](https://www.london.gov.uk/what-we-do/arts-and-culture/cultural-infrastructure-toolbox/culture-and-community-spaces-risk-resources#acc-i-60881).

**Objective 6: Resilient and well-networked community infrastructure** * We remain encouraged thatChisenhale is highlighted within the plan as requiring a community asset transfer to secure their long-term sustainability and invest in the premises. We welcome the updated reference to all three organisations including the gallery space, dance space and studios.
* CIL prioritise mention community Infrastructure: Policy CF1 to deliver new and improved sports and play facilities. Could cultural facilities also be included here? This could support capital costs for Chisenhale for example. Capital funding is extremely limited in London and therefore recognising this future need and embedding this within the plan would be of great value to achieving the wider objective within the plan to support such spaces.

**Representation Roman Road Bow Neighbourhood Plan Reg 14 Response April 21**The following is an officer response from the Culture and Creative Industries Unit regarding the Roman Road/ Bow Neighbourhood Plan. It references both GLA London Plan Policy and Cultural Policy and other supporting strategies and research documents. **Policy LE1: Encouraging flexible use of premises**1. London Plan Policy SD6 sets out the importance of variety within a high street setting, including night time and evening activities.
2. London Plan Policy E3 supports the aspiration to secure affordable workspace at rents maintained below the market rate for social and cultural use.
3. Flexible use of existing premises is encouraged, and this supports the aspirations of the Cultural Infrastructure Plan to increase capacity for cultural use without significant capital overheads.
4. The flexible use of premises on high streets is supported through changes to the Use Class Order which came into effect in September. This provides the opportunity to use spaces for cultural and community use including workspace, supporting the GLA’s High Streets for All Mission which aims to work with London’s diverse communities to establish new, exciting and experimental uses across London’s high streets and public spaces.

**Action CF2: Community Asset Transfer** 1. London Plan Policy HC5 encourages boroughs to support and enhance their cultural offer.
2. The Cultural Infrastructure Plan calls on local authorities to develop long-term community asset transfer policies.
3. Chisenhale Dance Space, Studios and Gallery play a significant role in London’s cultural ecology. Officers support the suggestion made in the Neighbourhood Plan to transfer ownership of the buildings from Tower Hamlets Council, using Community Asset Transfer. This will create a sustainable basis from which these significant cultural assets can evolve and seek investment. The transfer should include the gallery space, dance space and studios.
4. The GLA’s ‘A case for Dance Infrastructure’ highlighted that dance infrastructure such as rehearsal space was in high demand. Preservation and investment of spaces such as Chisenhale Dance space are important to maintaining and securing supply in the long term.
5. The GLA’s Artist Workspace Data Note identified that there are 11,500 studios in London, but only 13% have secure freeholds. Preservation of Chisenhale Artists’ Studios would lead to increasing the long term stability of London’s studios.
 |
| Historic England – Richard Parish | **Draft Roman Road Neighbourhood Development Plan -Regulation 16 Consultation**Thank you for consulting Historic England on the above document. As the Government’s adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the development plan process. The Government through the Localism Act (2011) and Neighbourhood Planning (General) Regulations (2012) has enabled local communities to take a more pro-active role in influencing how their neighbourhood is managed. The Regulations require Historic England as a statutory agency, be consulted on Neighbourhood Plans where the Neighbourhood Forum or Parish Council consider our interest to be affected by the Plan. As Historic England’s remit is advice on proposals affecting the historic environment our comments relate to the implications of the proposed plan for designated and undesignated heritage assets. Accordingly we welcome the opportunity to comment on the above consultation document. It should be noted that our comments are provided in the context of the National Planning Policy Framework (NPPF), National Planning Policy Guidance (NPPG) and Historic England’s Good Practice Advice (GPA) and Historic Environment Advice Note (particularly HEAN 11 : Neighbourhood Planning <https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/>**General observations**Historic England provided detailed comments in respect of the Regulation 14 consultation with the Neighbourhood Forum on 26 April 2021. We confirmed that our comments remained valid following the notification of the boundary change (email dated 16.7.2021). The Forums responses to our main comments are set out in the statement of community consultation that accompanies the draft plan. We are pleased to note the acknowledgement of our advice and the inclusion more detailed references to the historic environment and revised policies as suggested, which we consider will strengthen the effectiveness of the heritage aims of the Plan. As such we do not consider it necessary to respond in great detail. However to help with the determination of the plan our response is summarised below alongside any observations resulting from the revised Plan.Our key observations are:Traffic congestion and the severance of routes east into the Olympic Park are particular issues which effect the potential economic and social growth within the neighbourhood. Improving the public realm and links over the A11 would help Bow access developing cultural and educational facilities within the Olympic Park while improving public access to Roman Road and Bow Market has the potential to encourage greater activity around local and 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 help to support cultural activity . The neighbourhood area includes of designated and undesignated heritage assets and 7 conservation areas whose character and appearance contribute positively to the quality of life and character of the area. There is potential for these to be enhanced through a positive approach to the public realm to generate greater benefits. This is acknowledged within the current Plan which now makes reference to, and includes a map identifying, conservation areas. The area also includes over 60 listed buildings, many within the Tredegar Square conservation area. A number of identified heritage assets do, or have the potential to, make a greater positive contribution to community and cultural activity, including the Passmore Edwards Library, Bow Arts Trust, St Paul and St Stephen’s Church, and the “at risk” New Testament Church of God (former Holy Trinity), Morgan Street. Action LE2 in respect to Bow House Business Centre (Grade II listed) acknowledges this potential and could be extended where appropriate to encourage planning applications which seek to promote the creative use of underutilised heritage and community assets. We would therefore encourage the Neighbourhood Forum to consider future initiatives and policies which seek to enhance this potential.There remains the potential for identifying local heritage assets and the potential for this work to inform the Heritage Trail and also to develop specific policies or objectives to ensure proposed development responds and enhances the character of the area. We therefore welcome Policy 7.5.2. We would hope the Forum consider pursuing the identification of locl heritage in the event of the Plan being made. Our Heritage Advice Note HEAN 11 gives advice on undertaking this work and also policy writing.We previously recommend that the heritage significance of the public houses identified is clearly set out. As NPPF Policies for locally listed assets require proposals to be considered against their significance, ensuring that this is clearly identified would help to ensure that the contribution they make is preserved. The section and policies on public houses have been clarified however we would recommend that the criteria for selection and assessment conform to the Councils own Local Plan policies on local community and heritage assets (such criteria can be set out in supporting evidence rather than with the Plan itself.ConclusionWe consider that the proposed Plan will have a positive impact on designated and undesignated heritage assets and that the proposed policies are in conformity to national heritage policy as set out in the NPPF. This advice is made on the basis of the information supplied. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals should these arise and where Historic England consider it appropriate to do so.  |
| Marine Management Organisation – Lucinda Robinson | Dear Sir/Madam,**MMO Marine Planning and Marine Licensing response to Roman Road Bow****Neighbourhood Plan 2021-2031**Thank you for giving us the opportunity to comment on the Neighbourhood Plan.The comments provided within this letter refer to the document entitled RomanRoad Bow Neighbourhood Plan 2021-2031.As the marine planning authority for England, the MMO is responsible forpreparing marine plans for English inshore and offshore waters. At its landwardextent the Marine Plan boundaries extend up to the level of the mean high waterspring tides mark (which includes the tidal extent of any rivers), there will be anoverlap with terrestrial plans which generally extend to the mean low water springs mark.Marine plans will inform and guide decision makers on development in marine and coastal areas. Planning documents for areas with a coastal influence may wish to make reference to the MMO’s licensing requirements and any relevant marine plans to ensure the necessary considerations are included. In the case of the document stated above, the South East Marine Plan is of relevance. The plan was published for public consultation on 14th January 2020, at which point it became material for consideration. The South East Marine Plan was adopted June 2021, alongside the North East, North West, and South West. The South East Marine Plans cover the area from Landguard Point in Felixstowe to Samphire Hoe near Dover, including the tidal extent of any rivers within this area.All public authorities taking authorisation or enforcement decisions that affect ormight affect the UK marine area must do so in accordance with the Marine andCoastal Access Act 2009 and any relevant adopted Marine Plan, in this case theSouth East Marine Plan, or the UK Marine Policy Statement (MPS) unless relevantconsiderations indicate otherwise. Local authorities may also wish to refer to ouronline guidance, Explore Marine Plans and the Planning Advisory Servicesoundness self-assessment checklist.**Marine Licensing**The Marine and Coastal Access Act 2009 states that a marine licence is requiredfor certain activities carried out within the UK marine area.The MMO is responsible for marine licensing in English waters and for NorthernIreland offshore waters.The marine licensing team are responsible for consenting and regulating anyactivity that occurs “below mean high water springs” level that would require amarine licence. These activities can range from mooring private jetties to nuclearpower plants and offshore windfarms.**Summary notes**Please see below suggested policies from the South East Inshore Marine Plansthat we feel are most relevant to your neighbourhood plan.These suggested policies have been identified based on the activities and contentwithin the document entitled above. They are provided only as a recommendation and we would suggest your own interpretation of the South East Marine Plans is completed:**SE-HER-1:** Proposals that demonstrate they will conserve and enhance thesignificance of heritage assets will be supported. Where proposals may cause harm to the significance of heritage assets, proponents must demonstrate that they will, in order of preference:a) avoidb) minimisec) mitigate- any harm to the significance of heritage assets. If it is not possible to mitigate, then public benefits for proceeding with the proposal must outweigh the harm to the significance of heritage assets.**SE-SCP-1:** Proposals should ensure they are compatible with their surroundings and should not have a significant adverse impact on the character and visual resource of the seascape and landscape of the area. The location, scale and design of proposals should take account of the character, quality and distinctiveness of the seascape and landscape. Proposals that may have significant adverse impacts on the seascape and landscape of the area should demonstrate that they will, in order of preference:a) avoidb) minimisec) mitigate- adverse impacts so they are no longer significant. If it is not possible to mitigate, the public benefits for proceeding with the proposal must outweigh significant adverse impacts to the seascape and landscape of the area. Proposals within or relatively close to nationally designated areas should have regard to the specific statutory purposes of the designated area. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks and Areas of Outstanding Natural Beauty.**SE-EMP-1:** Proposals that result in a net increase in marine-related employment will be supported, particularly where they meet one or more of the following:1) are aligned with local skills strategies and support the skills available2) create a diversity of opportunities3) create employment in locations identified as the most deprived4) implement new technologies - in, and adjacent to, the south east marineplan area.**SE-CC-1:** Proposals that conserve, restore or enhance habitats that provide flood defence or carbon sequestration will be supported. Proposals that may have significant adverse impacts on habitats that provide a flood defence or carbon sequestration ecosystem service must demonstrate that they will, in order of preference:a) avoidb) minimisec) mitigate- adverse impacts so they are no longer significantd) compensate for significant adverse impacts that cannot be mitigated**SE-CC-2:** Proposals in the south east marine plan area should demonstrate for the lifetime of the project that they are resilient to the impacts of climate change and coastal change.**SE-CC-3:** Proposals in the south east marine plan area, and adjacent marine plan areas, that are likely to have significant adverse impacts on coastal change, or on climate change adaptation measures inside and outside of the proposed project areas, should only be supported if they can demonstrate that they will, in order of preference:a) avoidb) minimisec) mitigate- adverse impacts so they are no longer significant.**SE-AIR-1:** Proposals must assess their direct and indirect impacts upon local air quality and emissions of greenhouse gases. Proposals that are likely to result in increased air pollution or increased emissions of greenhouse gases must demonstrate that they will, in order of preference:a) avoidb) minimisec) mitigate- air pollution and/or greenhouse gas emissions in line with current nationaland local air quality objectives and legal requirements.**SE-ACC-1:** Proposals demonstrating appropriate enhanced and inclusive public access to and within the marine area, including the provision of services for tourism and recreation activities, will be supported. Proposals that may have significant adverse impacts on public access should demonstrate that they will, in order of preference:a) avoidb) minimisec) mitigate- adverse impacts so they are no longer significant.**SE-TR-1:** Proposals that promote or facilitate sustainable tourism and recreation activities, or that create appropriate opportunities to expand or diversify the current use of facilities, should be supported. Proposals that may have significant adverse impacts on tourism and recreation activities must demonstrate that they will, in order of preference:a) avoidb) minimisec) mitigate- adverse impacts so they are no longer significant.**Further points to note**Section 1.4 you refer to wider policy context, we would also recommend youmention the South East Marine Plan here.The East Inshore and East Offshore Marine Plans were adopted in 2014, and theSouth Inshore and Offshore Marine Plan was adopted in 2018, which cover theadjacent areas. Please ensure correct reference to the South East, South, andEast marine plan areas where included.I believe your council did not attend a South East Marine Plan ImplementationTraining session in March 2021. This provided an introduction to marine planning,and I would suggest re-visiting the material in our recorded webinar whichsupported the Consultation of the South East Marine Plan. Please let me know ifyou have any questions regarding implementation of the marine plan.As previously stated, these are recommendations and we suggest that your owninterpretation of the South East Marine Plan is completed. We would alsorecommend you consult the following references for further information:South East Marine Plan and Explore Marine Plans. |
| National Grid – Matt Verlander (Avison Young) | National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.**About National Grid** National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland. National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK’s four gas distribution networks where pressure is reduced for public use. National Grid Ventures (NGV) is separate from National Grid’s core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.**Proposed development sites crossed or in close proximity to National Grid assets:** An assessment has been carried out with respect to National Grid’s electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines. National Grid has identified that it has no record of such assets within the Neighbourhood Plan area. National Grid provides information in relation to its assets at the website below. • www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/ Please also see attached information outlining guidance on development close to National Grid infrastructure.**Distribution Networks** Information regarding the electricity distribution network is available at the website below: www.energynetworks.org.uk Information regarding the gas distribution network is available by contacting: plantprotection@cadentgas.com **Further Advice** Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. |
| Natural England – Sharon Jenkins | **Roman Road Bow Neighbourhood Plan – REG 16**Thank you for your consultation request on the above dated and received 6th December 2021.Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.**Natural England does not have any specific comments on this draft neighbourhood plan.**For any further consultations on your plan, please contact: consultations@naturalengland.org.uk |
| Surrey County Council – Steph Hamill | Dear Sir/MadamThank you for consulting Surrey County Council on the Roman Road Bow Neighbourhood Plan. Please note we do not have any comments to make. |
| TfL Commercial Property Development – Daniel Fleet | **RE: ROMAN ROAD BOW NEIGHBOURHOOD FORUM DRAFT PLAN** Thank you for providing the opportunity to comment on the Roman Road Bow Neighbourhood Forum Draft Plan. Please note that our representations below are the views of the Transport for London Commercial Development (TfL CD) planning team in its capacity as a landowner in the borough only and are separate from any representations that may be made by TfL in its statutory planning role and / or as the strategic transport authority for London. Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.**TfL CD General Comments** In TfL CD’s previous comments on the Roman Road Bow Neighbourhood Forum Draft Plan Regulation 14 consultation in April 2021 we said the following: *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.*It is noted that in response to these comments the RRB Forum said: *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.'* Having had a look at the December 2020 AECOM ‘Site Options and Assessment’ we see that the conclusion for Paton Close, Site 3 is (underline added for emphasis): *The site is potentially suitable for development once availability has been confirmed.* The previous representations confirmed that this site was available and as such this site should be included as a site allocation. At the very least, the development potential of the site should be reflected in the neighbourhood Plan.**Concluding Remarks** We hope that these representations are helpful but if you need any further information or would like to discuss any of the issues raised in our representations, please do not hesitate to contact me. We look forward to being kept up to date with your programme going forwards. |
| TfL Spatial Planning – Richard Carr | Thank you for consulting Transport for London (TfL). We previously commented in response to the Regulation 14 consultation on Roman Road Bow Neighbourhood Plan and now provide an updated TfL response taking into account changes to the Plan.The Neighbourhood Area includes the A11, Mile End Road, and A1205, Burdett Road. The western boundary is formed by the A12.  All of these form part of the Transport for London Road Network (TLRN). Mile End and Bow Road Underground stations and Bow Church DLR station are on the southern boundary and TfL operates numerous bus services as well as cycle hire in the area.We support objective 2 ‘Green streets that encourage cycling and walking’Policy GS1 ‘Improving safe walking and cycling routes’1 - It would be helpful if the policy explicitly required developments to include measures that contributed to the Mayor’s mode share target (reducing car use and increasing walking, cycling and public transport) and the application of the Healthy Streets Approach, as well as the Vision Zero objective for road safety. In addition to cycle parking and cycle infrastructure, the policy and actions could also support expansion of cycle hire where it is necessary to meet increased demand. We welcome support for School Streets although this could also be extended to Tower Hamlets Liveable Streets/Low Traffic Neighbourhood proposals and Streetspace for London initiatives2 - Alongside the retention of Blue Badge spaces, the actions could include conversion of general off street and on street parking to more beneficial uses.Action GS2 ‘To improve safe walking and cycling’1 - We support proposed improvements to cycling and walking infrastructure in the Neighbourhood Area. These include existing TfL proposals as well as more local initiatives. We welcome the intention to secure funding from development to help[ to improve the route network. A common terminology of Cycleways is now being applied to cycle routes.2 – As previously stated TfL notes the concerns about lack of step free access and the aspiration for improvements at Mile End station. However, due to very challenging engineering and spatial constraints within Mile End station, it is highly unlikely that it could be made completely step free right down to platform level. If external funding could be secured from proposed developments in the surrounding area, we may be able to carry out feasibility work to consider options for more limited access improvements. In the longer term TfL is considering ways to improve how we select and prioritise stations for step free access improvements at a network wide level. See details of a current consultation at <https://haveyoursay.tfl.gov.uk/tube-step-free-access>We hope that these comments are helpful and can be taken into account when the Neighbourhood Plan is finalised. |
| Thames Water – David Wilson | Dear Sir/Madam, Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment upon the above. As you will be aware, Thames Water are the statutory water supply and sewerage undertaker for the Borough and are hence a **“specific consultation body”** in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document:**Page 71– Comments on Water and Wastewater Infrastructure** Reference is made to Thames Water’s previous comments, but no response. Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of water supply and sewerage/wastewater treatment infrastructure. Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure. A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2021, states: “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for… infrastructure for waste management, water supply, wastewater…” Paragraph 11 states: “Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that: a) All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”Paragraph 28 relates to non-strategic policies and states: “Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure…” Paragraph 26 of the revised NPPF goes on to state: “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary….” The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306). Policy SI5 of the London Plan 2021 relates to water and wastewater infrastructure and supports the provision of such infrastructure to service development. Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water’s free pre planning service are available on the following website which should be referred to in the Neighbourhood Plan: <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>In light of the above comments and Government guidance we consider that the Neighbourhood Plan should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development proposed in a policy. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the Neighbourhood Plan include the following policy/supporting text: ***PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT*** *“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”* *“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”***Water Efficiency/Climate Change Comments** The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change. Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in Policy. Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on our website via the following link: <https://www.thameswater.co.uk/Be-water-smart>  It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations. We therefore consider that anew section should be added to Policy LS16 covering water efficiency. Proposed policy text: *“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption). Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”***Flood Risk & Sustainable Drainage Comments** In relation to flood risk, the National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers". When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.Flood risk policies should also make reference to ‘sewer flooding’ and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development. With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer in accordance with the drainage hierarchy. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding. Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change. SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits. With regard to surface water drainage, Thames Water request that the following paragraph should be included in Policy wording or supporting text: *“It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”*We trust the above is satisfactory, but please do not hesitate to contact David Wilson on the above number if you have any queries.  |