Examination Hearing Statement
London Borough of Newham, Local Plan Review 2018 – Matter 12

On behalf of: National Grid Property (Representation ref. 24)
Date: 6 June 2018

Background

This Statement supplements the written representations made by Carter Jonas on behalf of National Grid Property ("NGP"), to the Examination in Public of the London Borough of Newham ("LBN") Local Plan Review 2018. This Statement sets out the minor modifications which are sought in relation to NGP's landholdings at Bromley-by-Bow gasworks site (Strategic Site Allocation S11, Parcelforce).

NGP owns a diverse portfolio of approximately 300 former industrial sites across the country and is responsible for managing and regenerating these sites. In Greater London alone, NGP estimates that returning such non-operational land to a beneficial use could deliver around 10,000 new homes in the next 10 to 20 years.

NGP has formed a joint venture partnership with the Berkeley Group, called St William Homes LLP (St William). Together, this partnership will unlock some of the most technically complex regeneration sites at the heart of communities across London and the South of England.

In the context of increasing London Plan housing targets¹, NGP recognises the importance of its role in contributing to the supply of housing for Londoners and delivering the most effective use of redundant sites.

This Statement only references questions and issues which are relevant to NGP’s representations and identifies the amendments which NGP consider are required for the Local Plan to be found sound. NGP also rely upon the detailed justification for each of these matters, as set out in preceding representations.

Matter 12 – Spatial Policies and Sites

The main issues identified within Matter 12 are:

"12.1 Policies Map: Do the site allocation policies pay adequate regard to the site context, including for example the need to maximise housing densities at transport hubs, and the need to enhance or maintain the character and appearance of Conservation Areas?"

"12.2 Other soundness Issues: Are there any other soundness issues relating to specific sites in Newham?"

¹ An increase of almost 35%, from the proposed Local Plan target of 2,867 dpa to the target set in the emerging Draft London Plan of 3,850 dpa. In comparison to the adopted London Plan target of 1,994 dpa, this equates to an increase of 93%.

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Response

NGP welcomes and strongly supports the inclusion of the Bromley-by-Bow gasworks site as a strategic site allocation in the LBN Local Plan review as part of Strategic Site S11, Parcelforce. As a vacant, underutilised brownfield site, it has great potential to contribute to the supply of housing in Newham and to provide wider social, economic and environmental benefits for the surrounding community.

To realise this opportunity will be a costly undertaking. As a former gasworks, with its associated infrastructure in-situ, the site will require extensive remediation before it can be brought into beneficial use. The site is also constrained by significant physical underground obstructions, which together with the required remediation, mean that NGP will incur large and abnormal costs in its redevelopment.

NGP is very experienced in releasing its former gasworks for development, and such constraints should not preclude the redevelopment of a site with this degree of opportunity. However, it does mean that for the redevelopment of the site to come forward, the Local Plan needs to promote viable and value generating development which can absorb the site-preparation costs.

In NGP’s experience, an allocation for employment-led development would not generate the value required to meet these costs, and a mixed use scheme which includes substantial residential floorspace is more likely to be viable and deliverable. Given the recognition of the NPPF (Paragraph 173) that plan-making requires careful attention to viability and costs, and that plans should be deliverable, it is imperative that the costs of undertaking development on the site are considered.

The site contains seven gasholders which are Grade II Listed. A detailed assessment of these listed structures will need to be undertaken prior to development proposals being prepared. Such an assessment will need to consider the heritage issues associated with retaining some or all of the gasholders. The assessment will consider their heritage significance, their structural soundness, the costs of retention and any remedial attention which is required in association with decontamination works.

As currently drafted, the draft Local Plan Review requires the “integration of the protected historic gasholders”. In principle, NGP agrees that the heritage assets are recognised in the strategic site allocation, however such recognition should be consistent with National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).

The allocation should not prescribe that all the gasholders are integrated into a future development. Instead, the allocation should enable proper assessment of how the site should be redeveloped in accordance with national, regional and local planning policy. In particular the benefits of a future scheme, which could include new homes, public access, and new jobs, should all be balanced against the impact on the heritage assets.

It is in the context of these particular site considerations which NGP does not consider the Local Plan is currently sound, against the tests of Paragraph 182 of the NPPF:

- The strategy for employment-led uses is not justified by evidence or effective. To deliver the redevelopment of a site with such high remediation and preparatory costs requires value generating uses to be promoted. In NGP’s experience, an allocation for employment-led uses would not achieve this – the delivery of a scheme for comprehensive redevelopment will most likely be achieved with residential proposals at its core.

- The current wording regarding heritage assets is not consistent with national policy. The NPPF requirement for a balancing exercise at the stage of determining a planning application enables flexibility in plan-making, and expert analysis of a detailed set of proposals in decision-taking. The current wording of site allocation S11 does not reflect Section 12 of the NPPF, and should be amended to require the assessment of, and a strategy for, the designated heritage assets.
• The proposed, indicative building heights are not justified, effective, or consistent with national policy. They do not reflect the tests set out in the NPPF for development which has an impact on heritage assets, nor would they make best use of the site, with a density that is appropriate to its context and setting. Building height, in the form of storeys, is an impractical measure of impact on surrounding assets. Such considerations can only be made once a detailed design has been developed, with scale and mass articulated architecturally. In this sense, development on this site should take a design-led approach.

To support and promote the delivery of this site, NGP proposes the following amendments to strategic site allocation S11, Parcelforce:

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<th>Strategic Site: S11, Parcelforce</th>
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<td>Employment-led Mixed use residential and employment development (linking to existing Cody Road industrial uses) that contributes to the creation of a new local centre in the vicinity of West Ham station, and integration of the protected historic gasholders, along with delivery of a riverside open space. Proposals will require an assessment of, and strategy for, the protected historic gasholders. Site access improvements will be required, including links to West Ham station, the neighbourhood beyond, to S10 and to Bromley-by-Bow. The scale of development will follow a design-led approach, taking account of the site’s context, including responding to opportunities around the station, to site sensitive assets and to existing homes on Manor Road. Indicative height of 8-12 storeys with lower development towards the west of the site sensitive to the heritage assets, and up to 19 storeys around the station, subject to addressing the sensitivity of existing homes on Manor Road.</td>
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NGP proposed amendments
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