



Quod

R22 Local Plan
Matter 4:
Neighbourhood
Policies and
Allocations -
N13 East Ham

Newham Local
Plan

St William Homes LLP

06TH NOVEMBER 2025

Q230126

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Introduction

- 1.1 On behalf of St William Homes LLP ('St William'), Quod submits this hearing statement in respect of Matter 4 Neighbourhoods and Allocations in response to IN3: Inspector's Matters, Issues and Questions; and Hearings Programme issued by the Inspector on 9th October 2025.
- 1.2 Continuing St William's engagement in the Regulation 18 (February 2023) and Regulation 19 (September 2024), this hearing statement is made in respect of the following Neighbourhoods and Site Allocations:
 - N17 Gallions Reach / N17.SA1 Beckton Riverside
 - N7 Three Mills / N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks
 - N8 Stratford and Maryland / N8.SA7 Rick Roberts Way
 - N13 East Ham / N13.SA3 Former East Ham Gasworks
- 1.3 **This Hearing Statement should be read in conjunction with our Hearing Statement for Matter 12 – Green and Water Spaces.**

Q4.15

Are policies N13 and N13.SA1 to N13.SA3 justified and will they be effective in helping to achieve sustainable development in the East Ham neighbourhood?

Introduction

- 1.4 N13.SA3¹ is a deliverable site allocation, available and suitable for housing development now. R22² amendments are required to ensure that N13 and N13.SA3 are sound, effective and justified.
- 1.5 Some of those amendments are set out in our responses to Q1.9/10 (Viability) Q2.2/3 (Housing requirement); Q3.2 (Tall Buildings); M5 (Housing land supply); Q6.2 (AH) and Q6.3 (Housing Mix); and in particular Q12.1 Green Spaces.
- 1.6 Fundamentally due to the soundness concerns raised, in accordance with the Pennycook³ letter, flexibility should be written into the plan to avoid a poor-quality plan and to significantly boost housing supply. R22 must apply the presumption at paragraph 11d) of the Framework at its heart, and paragraph 125(c) should be embedded into the plan. It should include a review once the London Plan is adopted and flexibility to stimulate delivery.

East Ham Gas Works

- 1.7 St William is freehold owners of the former gasworks. First built in 1903, the site still distributes gas via high pressure mains and contains operational equipment on site which dissects the site through a significant amount of infrastructure. The site contains a substantial gasholder of 15 storeys equivalent (46.9m AOD), an elevated concrete bund dumping, subterranean tanks (-4.5m below ground) and a pressure reduction station in addition to sewers, water mains, and gas mains - all utility infrastructure.
- 1.8 Due to its previous use, the site is contaminated. Initial site investigations have been undertaken and have identified contamination is present and includes Aliphatic, Aromatic hydrocarbon bands, BTEX, Chrysotile cement, Cyanide, Heavy metals and Naphthalene⁴. The site is known to contain unexploded ordnance from the WW2 ('UXOs'). The site constraints plan is enclosed at **Appendix 1**, alongside the site's no build zones (**Appendix 2**), and UXO Plan (**Appendix 3**). These clearly pose a human health risk and need to be addressed prior to development.

¹ Strategic policy R22 (SD005B), page 19

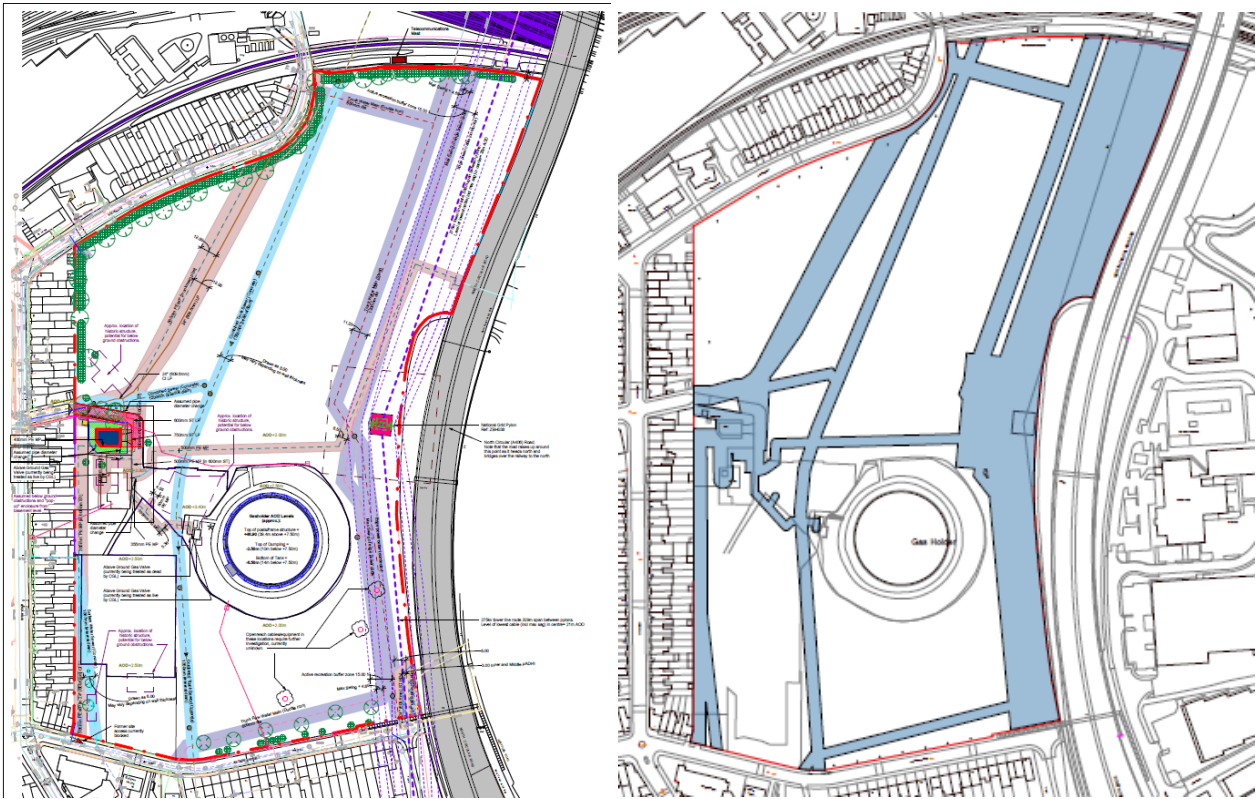
² SD005b Newham Submission Local Plan Tracked Changes

³ Matthew Pennycook MP Minister of State for Housing and Planning letter of 9th October 2025 to Paul Morrison Chief Executive The Planning Inspectorate

⁴ These finding correlate with R22 page 321: *'This includes contaminated land and the remnants of industrial use such as gasholders. Without land remediation and amelioration of environmental degradation prior to development, a site may not be viable or may even be harmful to future residents or occupiers'*.

1.9 The site is private land, secured by fencing. There is no public access, and there has never been public access. The site will remain secured with no public access due to these hazards because the land is not suitable or safe for public use. Limited development suggested by the R22 on the non MOL designation would not fund the works required to remediate the site and open it up for public use. For this reason, St William propose to extend the MOL deallocation proposed by the Council to Parcel 1 and Parcel 2 (see Q12.1 Green Spaces Hearing Statement).

Figure 1 - PDL site constraints and no build zones



1.10 Photos of the site are included at **Appendix 4**.

N13 & N13.SA3 Site Allocation

1.11 As PDL, St William and the Council are rightly promoting the site for redevelopment to deliver new homes and help address the housing emergency in Newham.

1.12 The R22 policies are welcomed but should be amended to be effective to address the following deficiencies:

1.12.1 The PDL site is a contaminated former industrial site and contains substantial infrastructure and challenges to delivery. These are not currently recognised and should be, to enable effective delivery of the site. St William agreed wording with Tower Hamlets in their adopted Local Plan for its gasworks sites in that borough, which were adopted by the examination Inspector, and we request are used again for the purposes of the Newham Local Plan.

- 1.12.2 R22 policies BFN1(e), BFN1(f), N13(11), N13(12) and GSW1 seek to open the site up to the public, a laudable MOL objective, but the R22 is not effective as it does not recognise the site constraints which need to be addressed before public access can occur. Our amendments to N13.SA3 propose a viable strategy to address this concern.
- 1.12.3 The Council's R22 evidence EB046⁵ Playing Pitch and Outdoor Sport Strategy refers to a disused cricket pitch on site. This private cricket pitch has been abandoned and there has been an absence of use approaching two decades. This evidence base should inform policy wording. We support a viable strategy to replace this pitch.
- 1.12.4 The site contains a 15-storey equivalent structure, a significant visual marker, which the tall building evidence base [EB023⁶, EB026⁷ and TP001⁸] and TBZ3 (East Ham Tall Building Zone) study has omitted. It informs the appropriate building heights on site, particularly given its location isolated from heritage assets, and should be included as a reference. We have responded to Q3.2 (Tall Buildings) on this matter.
- 1.12.5 The site is designated to become an SINC (Grade II – Borough Importance) with EB070 identifying the site as “*An extensive area of rough grassland, scrub and ruderal habitat surrounding the former East Ham gasholder. Already designated as protected green space GS82*”. The designation of the site as a SINC is incompatible with Site Allocation N13.SA3 because redevelopment to enable the site to be safe for public access will require remediation to address existing contamination and UXO. This will result in removal of the top part of the made ground and the identified existing habitats
- 1.13 Both parties agree that reorganisation of the MOL should be undertaken, but we disagree with the extent for the reasons set out in Q12.1 Green Spaces relating to the unjustified assessment of whether the land meets MOL purposes⁹, and the exceptional circumstances necessary to achieve the wider policy objective of N13.SA3 and other policies to open the site up for public use.
- 1.14 St William's vision is to deliver a residential development set within extensive public open space and sporting facilities through the remediation of the site to remove the physical and hazardous barriers which prevent public access.
- 1.15 New homes (c.600 homes) are proposed on the southern half of the site on isolated pockets of land where there is the least amount of designated MOL which is tightly constrained by the 46m gasometer, 50m electricity pylon and elevated A406. This development is required to fund the delivery of extensive remediation and infrastructure works across the whole site, necessary

⁵ EB046 page 27 & 29 “*whilst a disused grass wicket square is identified at Leigh Road Gasworks Sports Ground*” & “*There is a disused cricket square at Leigh Road Gasworks Sport Ground. To increase provision in Newham, one option could be to explore reinstating this, although it is unknown as to how feasible this is.*” and Table 6.1: Site by site Action Plan

⁶ EB023 Fig 20 Newham existing tall buildings does not refer the gasholder

⁷ EB026 page 15 & 16 categorises the gasholder as terrace housing and sensitive to change

⁸ TP001 paragraph 58

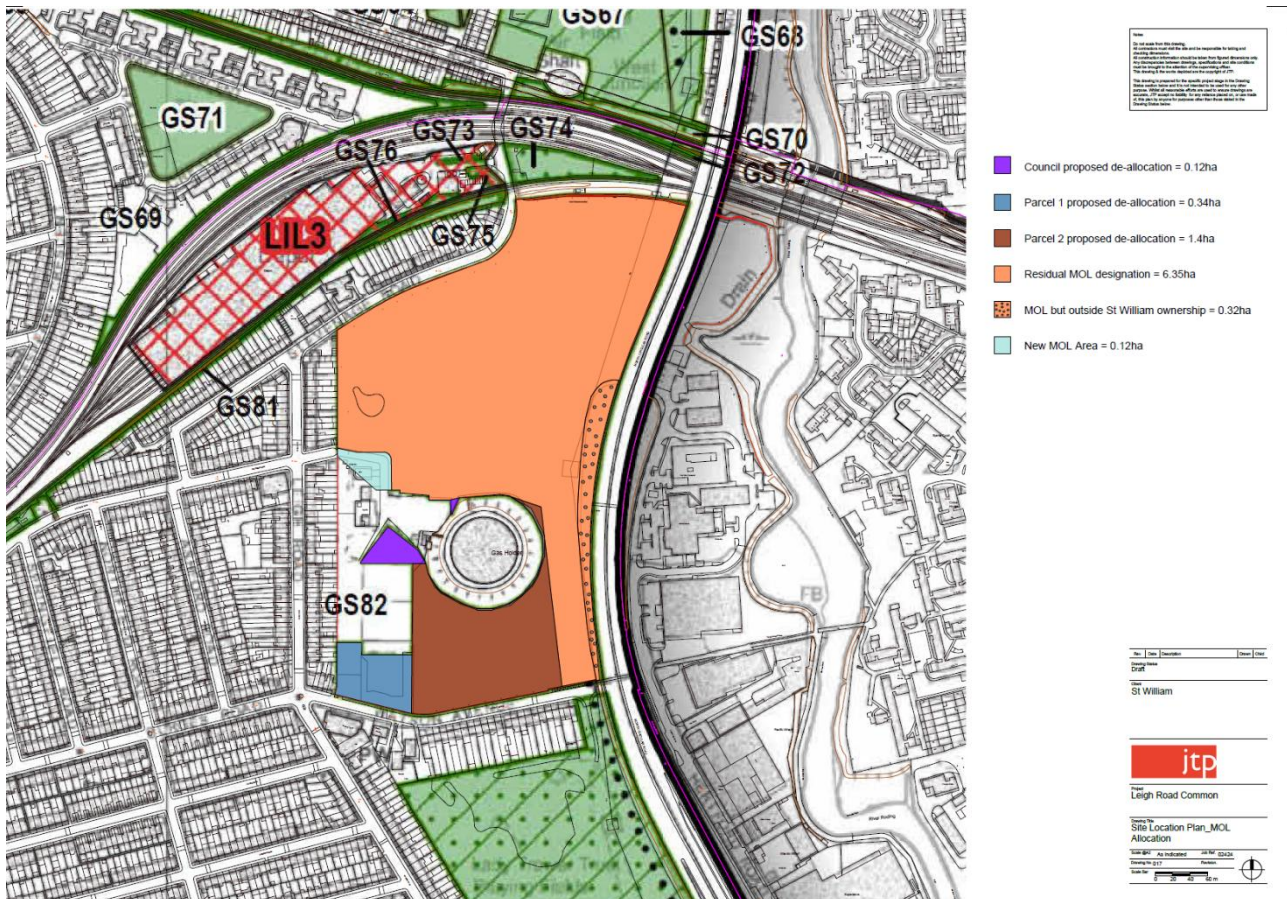
⁹ EB068 and EB069 MOL review

to open the site up to the public and provision of a cricket pitch to meet the objectives of MOL¹⁰ and N13.SA3.

1.16 The MOL de-designation by the Council and St William is summarised below at Figure 2 using the adopted Policies Map as a baseline, and at **Appendix 5**.

1.17 This assessment which would result in de-allocation of 1.85ha (22%) (R22 and St William proposal) to deliver N13.SA3 objectives and 6.67ha MOL retention.

Figure 2 - MOL de-designation and retention (Adopted Policies Map)



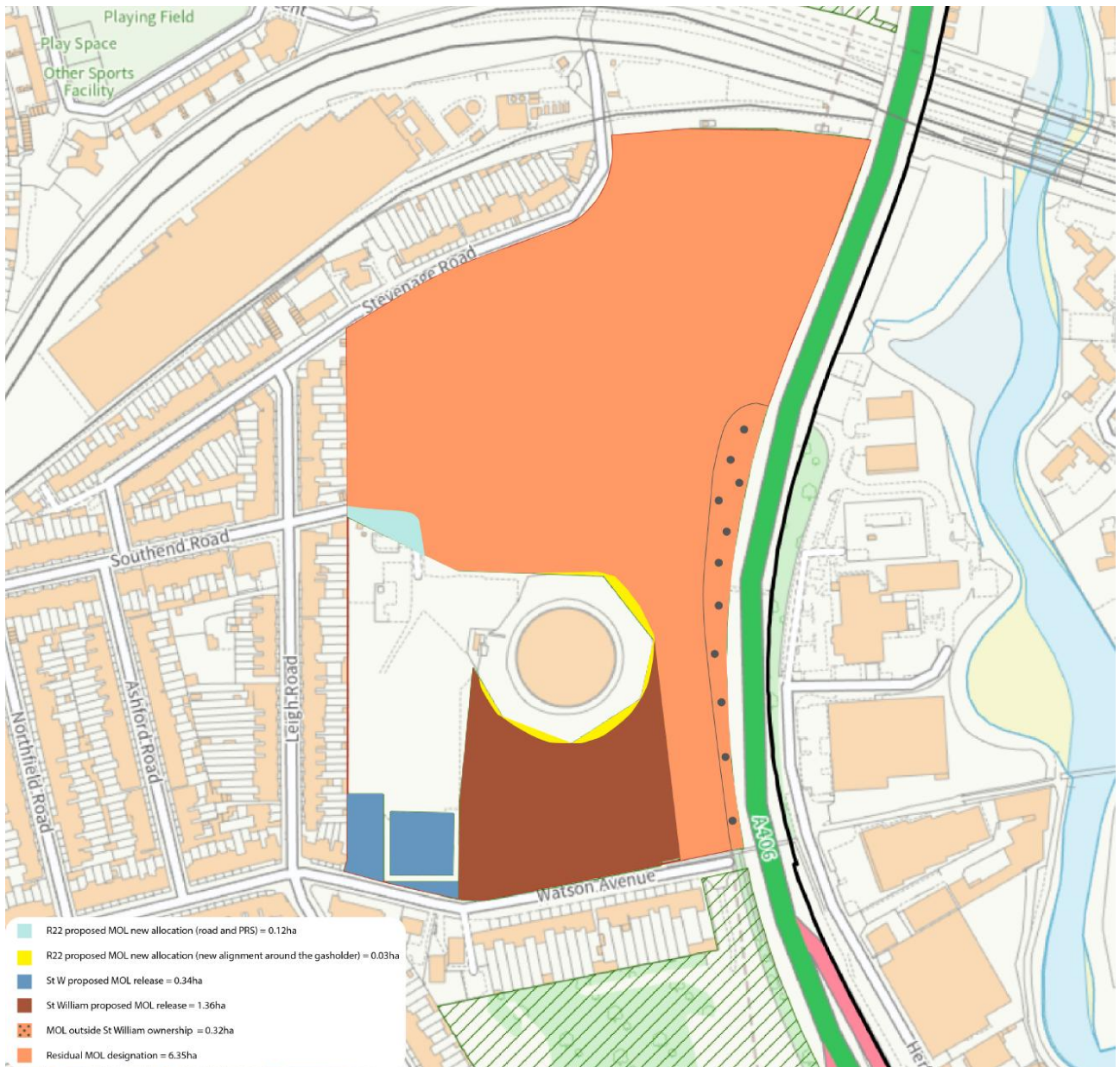
1.18 We have also annotated the Council’s draft local plan at Figure 3 and **Appendix 6**, which identifies new areas (light blue = 0.12ha and yellow = 0.03ha) that the Council propose to designate as MOL, unjustified because this is former gasworks infrastructure and the MOL review evidence base EB068¹¹ and EB069¹² does not explicitly identify these areas and justify their inclusion against LP G3 policy criteria.

¹⁰ LP G3 paragraph 8.3.1 MOL protects and enhances the open environment and improves Londoners’ quality of life by providing localities which offer sporting and leisure use, heritage value, biodiversity, food growing, and health benefits through encouraging walking, running and other physical activity .

¹¹ Newham Metropolitan Open Land Review (2025)

¹² Newham Metropolitan Open Land Review (2025). Appendix A: Newham MOL Site Pro Formas

Figure 3 - MOL de-designation and retention (R22 Policies Map)

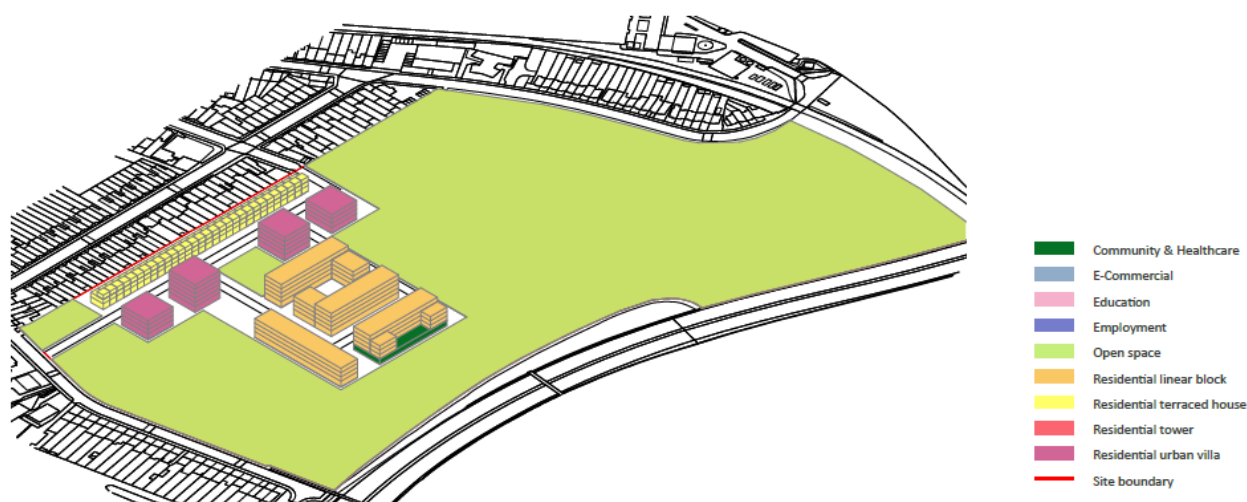


Site Capacity Estimate

1.19 The Council's capacity assumes 246 homes¹³ at a height of 5 storeys. This assessment requires some caution for the following reasons:

- The layout does not take into account site constraints, easements and no build zones.
- It proposes development on MOL.
- The Council's urban design framework 'square's off' the round gas holder for development, assuming further MOL de-designation.
- It generates 246 homes, which would not viably deliver any affordable housing (EB099 WPVA), and would not fund the remediation of the remainder of the site and would not result in meeting MOL purposes. The MOL would remain closed off to the public.
- In any event, St William's analysis of the Council's scheme, if it is only located on the hardstanding, is 187 homes only.

Figure 4 - ED003A R22 extract



1.20 St William's¹⁴ capacity exercise taking the above constraints into account (and applying the same mix) proposes 200 homes at 6 storeys with no MOL release (Option 1). Option 1 builds as per the current N13.SA3 requirement, and the site remains closed off to the public.

1.21 Option 2, which assumes de-allocation of MOL Parcels 1 and 2 (21%) would deliver c.600 homes and the N13.SA3 objectives.

¹³ Appendix 7: ED003A R22 indicative scheme extract

¹⁴ Appendix 8: St William x2 schemes

Figure 5 - St William Options 1 (PDL) & 2 (PDL and MOL release)



1.22 Option 2 utilises 21% MOL de-designation, remediates the whole site, and opens it up for public access including a cricket pitch and new 6-side football pitch to the north, alongside c.600 homes and the new access off Watson Avenue.

1.23 It can therefore be reasonably concluded that ED003A overestimates housing capacity for N13.SA3.

N13.SA3 Amendments

N13 and N13.SA3

1.24 We enclose tracked changes to N13 and N13.SA3 at **Appendix 9 and 10**.

Maps / Figures

1.25 It is proposed that N13.SA3 Former East Ham Gasworks Map is amended as per **Appendix 11**.

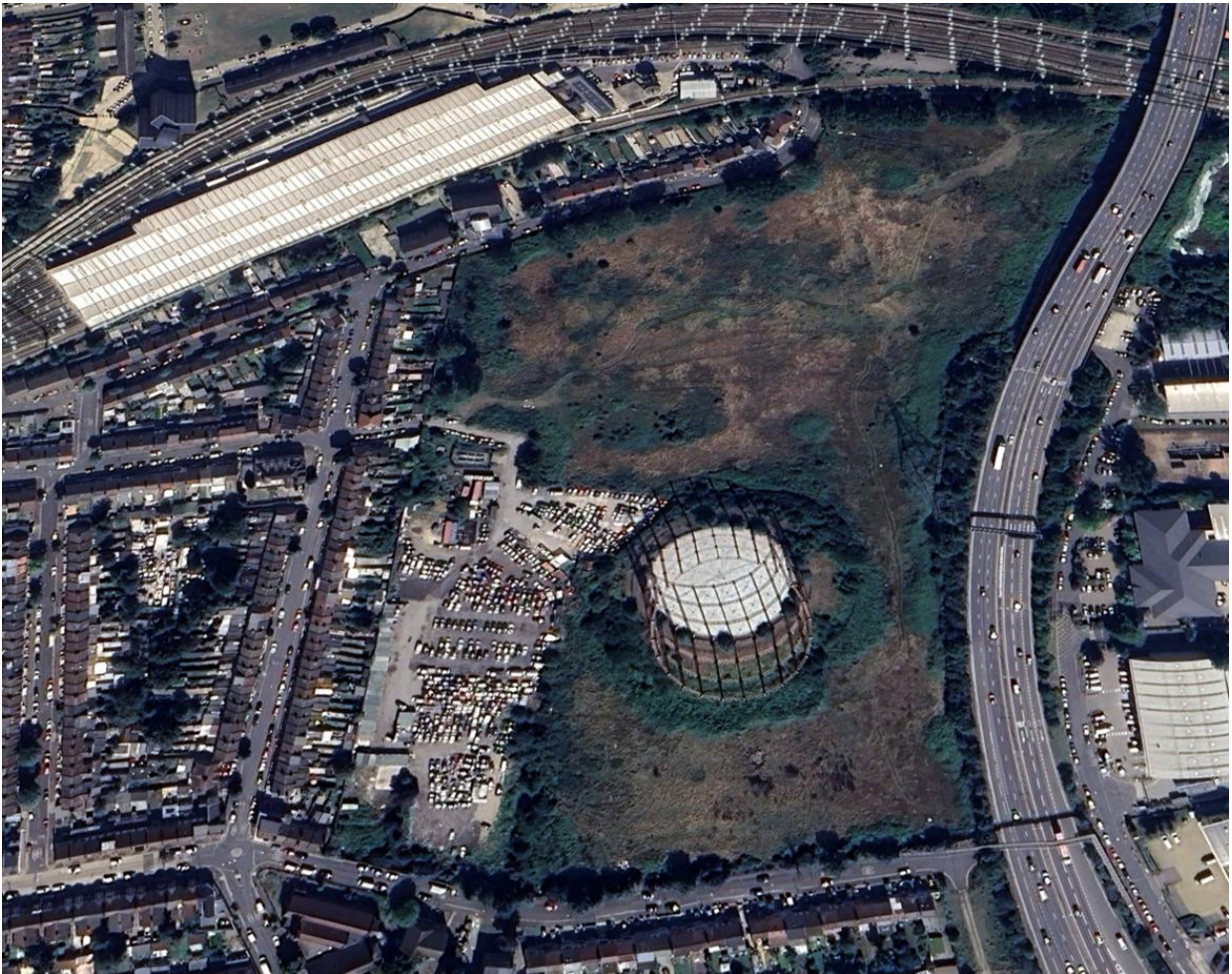
1.26 It is proposed that the Key Diagram (R22 page 24) reflects this amendment, and the R22 Policies Map. At the very least this requires amendments to reinstate the unjustified new MOL designations referred to at 1.15 above.

1.27 We do note that there is inconsistency in the R22 mapping of green space at N13.SA3 across the online Policies Map, N13.SA3 map and key diagram and MOL Area 21, 22, 23 and 24.

Conclusion

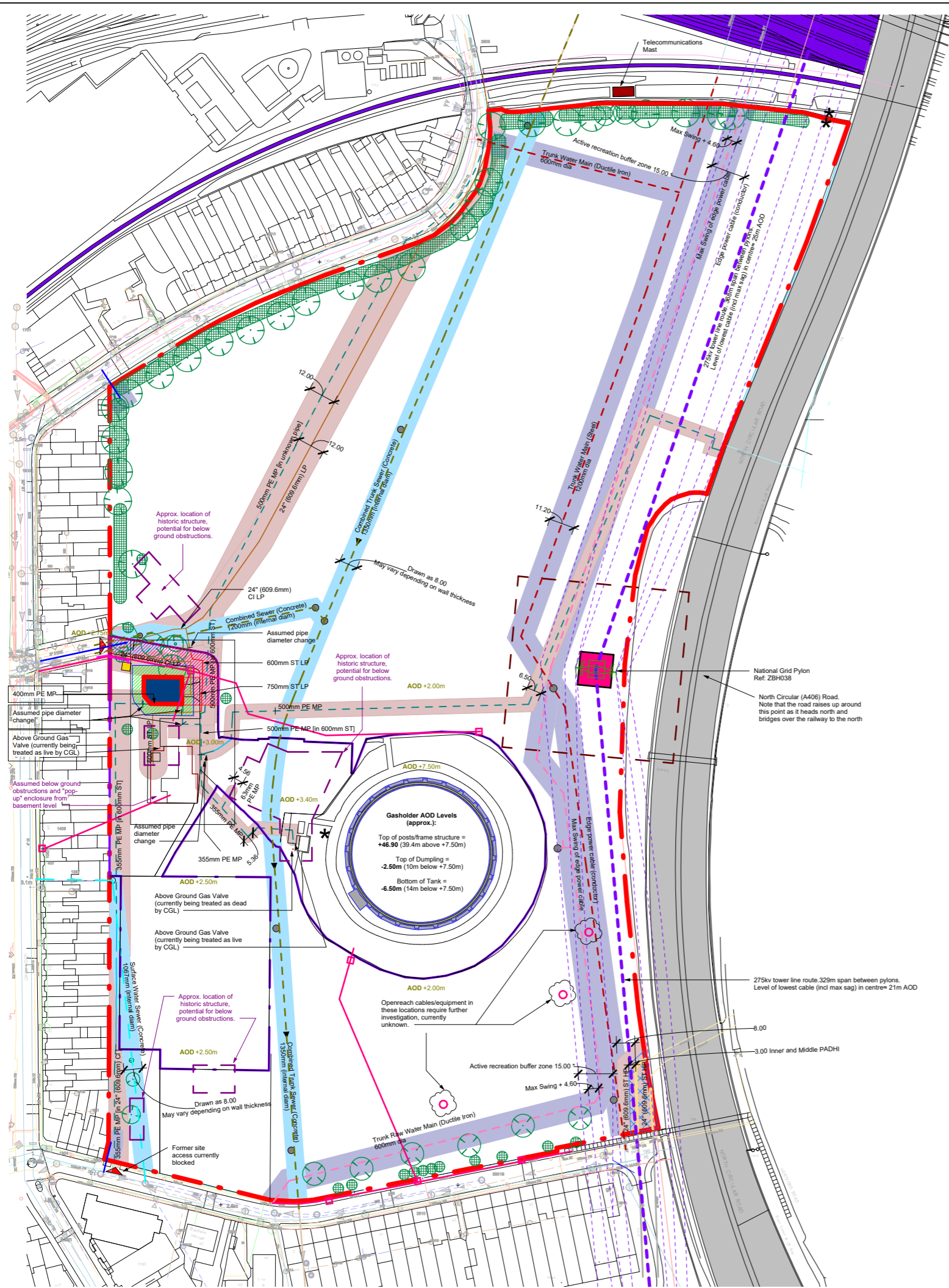
- 1.28 Whilst not included as part of the word count, we enclose a summary of the St William representations to the R22 referred at paragraph 1.2 and **Appendix 12**.
- 1.29 We have also suggested policy wording similar to the adopted Tower Hamlets Local Plan Policy D.SG5 “*For site allocations, the policies set out in this plan may be applied flexibly to ensure that the sites are viable and deliverable*” to ensure that sites are developable¹⁵.
- 1.30 An aerial image of the site is shown at Figure 6 and enclosed at **Appendix 13**.

Figure 6 - Aerial photograph of site



¹⁵ Framework glossary ‘developable’

Appendix 1 – Site Constraints Plan



- KEY**
- Site Boundary
 - Metropolitan Open Land (MOL) Boundary
 - ▲ Current Site Access
 - L/P Gas main identified during utility trace
 - - - L/P Gas main not identified during utility trace (based on asset plan)
 - - - M/P Gas main identified during utility trace
 - - - M/P Gas main not identified during utility trace (based on asset plan)
 - H/P Gas main identified during utility trace
 - - - H/P Gas main not identified during utility trace (based on asset plan)
 - Anticipated Gas Easement (refer to notes)
 - Gas easements (based on BNP Paribas Feb 2018 Site Plan)
 - Inner and Middle PADHI zone
 - Existing Gasholder Obstruction Zone (Above and Below Ground features)
 - Substation
 - Residential
 - - - TW Combined Sewer
 - - - TW Surface Water Sewer
 - - - TW Trunk Water Main
 - - - Trunk Raw Water Main (likely Essex and Suffolk Water, but could be TW)
 - TW Distribution Main
 - Thames Water Build Over Agreement required when building within 3m of a sewer
 - Thames Water No Development or Structure within 5m of a trunk main or 3m of a distribution main - Blanket exclusion, buildover agreements aren't acceptable
 - Existing Manhole / Inspection Chamber
 - Telecommunications Mast (ICNIRP zones applicable - refer to notes)
 - Pylon Supporting National Grid Overhead Line
 - - - National Grid Overhead Electric Line (centre)
 - - - National Grid overhead electric cable (conductors) & offsets (refer to notes on plan)
 - - - 30m Tower Stand off zone (work within this zone requires approval from N.Grid) (refer to page 8 of Ref 2 for further information)
 - Gas Governor
 - ★ Japanese Knotweed c. 6m x 6m area
 - Tree (extracted from Atkins Utility plan)
 - TPO identified by Newham Council (indicative location only)
 - Historic Cadent Compound (assumed basement structure existing on site)
 - Cadent 24/7 Access and Parking Area
 - Cadent Oversailing and Boundary Works Zone
 - Openreach Cable/Equipment
 - Topographic Levels
- AOD → X.XXm
- 00 20 40 60 80 100 Meters
- SCALE 1:2000 @ A3

Notes

1a. The location of the gas mains are based on a combination of the Cadent Asset plan dated October 2021, the Atkins service drawing dated October 2017 and the Atkins Services drawing and technical note dated September 2021. The exact locations and status of all of the mains will need to be verified. NGP commissioned Atkins to undertake a GPR survey in August 2021, but a number of the gas mains were not located due to overgrown vegetation. Atkins recommended intrusive works to physically locate these mains in the technical note.

1b. The gas mains are subject to easements. All of the easements will need to be confirmed by Cadent. Where applicable the gas easements indicated are based on two historic gas main easements indicated are based on two historic gas main easements deeds that were provided by NGP; the original easement deed dated June 2001 and a rectification deed dated March 2003. The quality of this information is poor and will need to be verified. However there are some gas mains that are present on site which are not covered in the Deed, for these gas mains the Cadent Standard Easement Widths (EB 10600 22/03/2018).

1c. Gas Easements indicated in the Deed of Grant of Easement Gas Main Ref: (legal easement) [Cadent std. easement]

1. 500mm PE MP (north): (12m) [6.5m]
2. 24" (610mm) CI LP (north): (12m) [6.61m]
3. 500mm PE LP (west): 12m [3.5m]
4. 24" (610mm) CI LP (west): (12m) [6.61m]
5. 355mm PE MP (south west): (12m) [5.355m]
6. 610mm ST HP (south east): (16m) [18.3m]
7. 610mm ST HP (south east2): (16m) [18.3m]

1d. Gas Easements not indicated in the Deed of Grant of Easement Gas Main Ref: (legal easement) [Cadent std. easement]

- i. 355mm PE MP (central): (N/A) [5.355m]
- ii. 500mm PE MP (central north): (N/A) [6.5m]

1e. PADHI+ zones are applicable for the 2No. HP mains in the south east corner of the site, the PADHI zones are defined as follows from the HSE: Inner 6m, Middle 6m, Outer 180m (all total widths measured from centre of pipe). The inner and middle zones have been indicated on the constraints plan.

2. All of the site is in 'Flood Zone 3: Areas benefiting from flood defenses', with the exception of the land where the gasholder is positioned. Refer to the EA Flood map.
3. The site is also partly located in High Risk, Medium Risk and Low Risk Surface Water Flood zones. Refer to the surface water flood map on flood-warning-information.service.gov.uk/
4. The National Grid overhead electric transmission line is subject to several development constraints. This constraints plan should be read in conjunction with:
 - Ref 1: *National Grid :TN287 - Third Party Guidance of Working near electricity transmission equipment*
 - Ref 2: *National Grid: Design guidelines for development near pylons and high voltage overhead power lines*
 - *National Grid Swing and Sag drawings for ZBH037 to ZBH038 and ZBH038 to ZBH039*
5. The telecommunications mast will be subject to ICNIRP zones for the public and RF trained workers. The extent of these zones vary and will need to be assessed by a specialist.

Standard Easement Widths

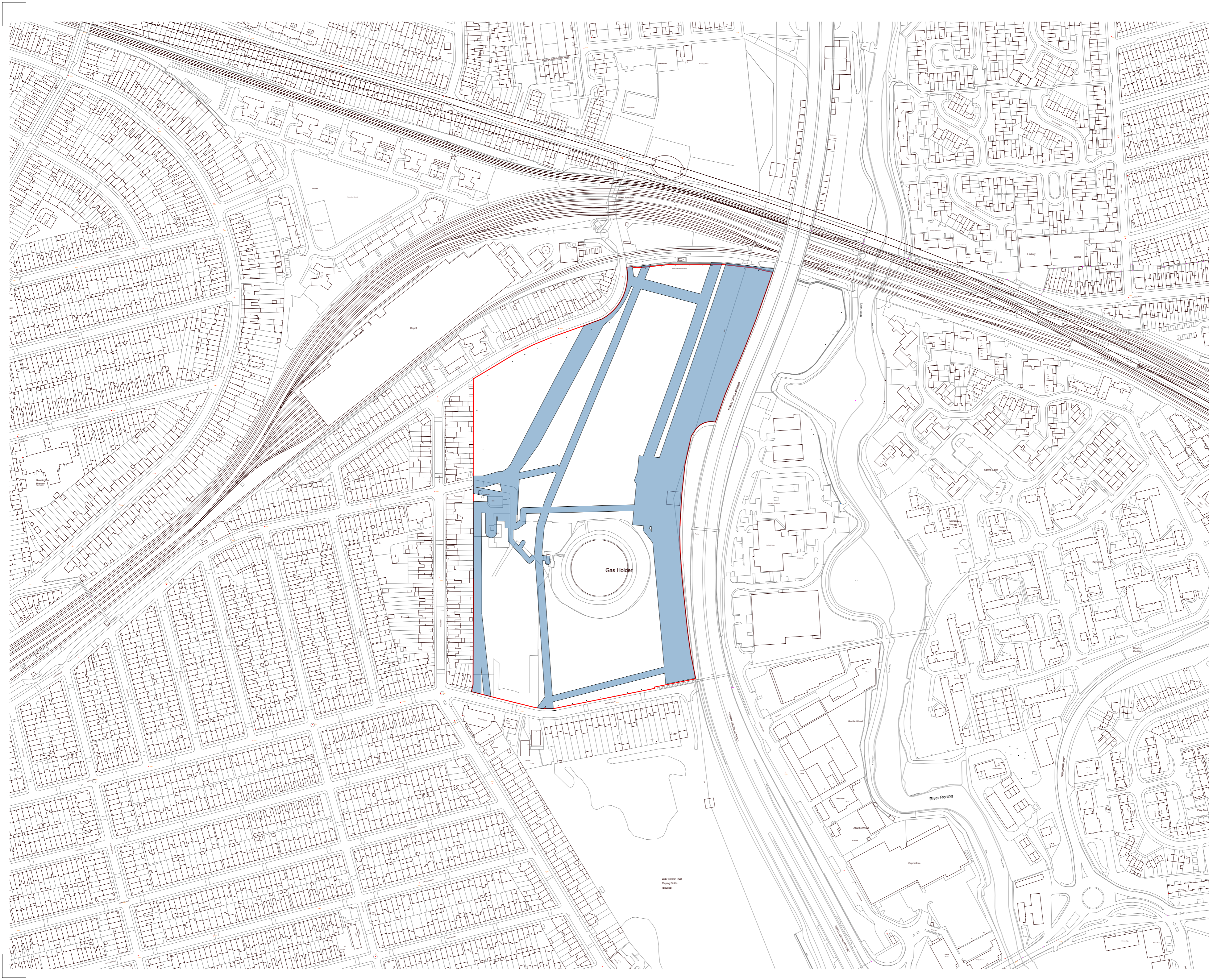
Pressure tier / Material	Diameter	Easement Width (total)
HP Steel	900mm, 1060mm, 1200mm (36", 42" & 48")	24.4m (80')
HP Steel	750mm and 600mm (30" & 24")	18.3m (60')
HP Steel	Up to and including 450mm (18")	12.2m (40')
HP RTP	Determined on a case by case scenario	
IP Steel	All Sizes	6m plus pipe diameter
IP PE > 5.5 bar	Above 500mm (19")	30m plus pipe diameter
	356mm - 500mm	16m plus pipe diameter
	126mm - 355mm	12m plus pipe diameter
	Up to and including 125mm	12m plus pipe diameter
IP PE < 5.5 bar	Above 500mm (19")	26m plus pipe diameter
	356mm - 500mm	8m plus pipe diameter
	126mm - 355mm	8m plus pipe diameter
	Up to and including 125mm	8m plus pipe diameter
MP PE	Above 500mm (19")	12m plus pipe diameter
	356mm - 500mm	6m plus pipe diameter
	126mm - 355mm	5m plus pipe diameter
	Up to and including 125mm	4.5m plus pipe diameter
MP Steel	All Sizes	6m plus pipe diameter
MP Iron *	All Sizes	6m plus pipe diameter
LP	Above 125mm	3m plus pipe diameter
	Up to and including 125mm	1m plus pipe diameter

Rev 1 29/10/2025: FIRST ISSUE

PROJECT	SHEET NAME		
East Ham Gasworks	Constraints Plan_LPA		
Date	29/10/25	Scale (@ A3)	1 : 2000
Drawn by	DB	DRAWING NUMBER	0003
Checked by	RF	REV	1

LOCATIONS OF SERVICES INDICATIVE DO NOT SCALE FROM THIS DRAWING

Appendix 2 – Plan showing no build zones



Notes
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Rev	Date	Description	Drawn	Chkd

Drawing Status
Draft

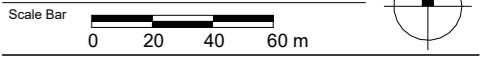
Client
St William



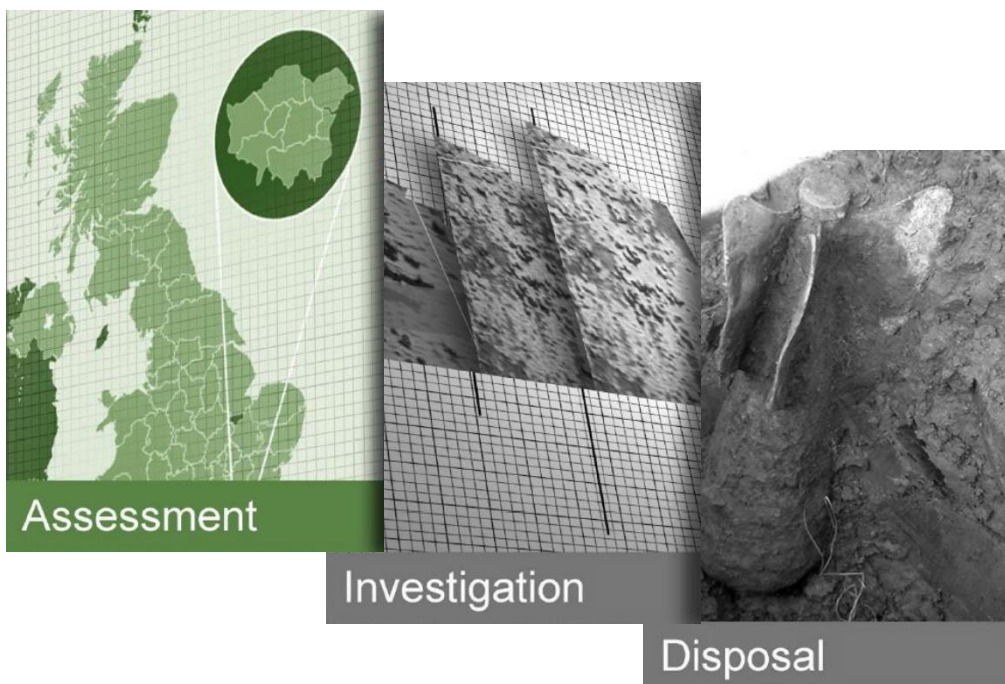
Project
Leigh Road Common

Drawing Title
Site Location Plan

Scale @A2 1 : 2500 Job Ref. 02424
 Drawing No. 012 Revision.



Appendix 3 – Unexploded Ordnance Map



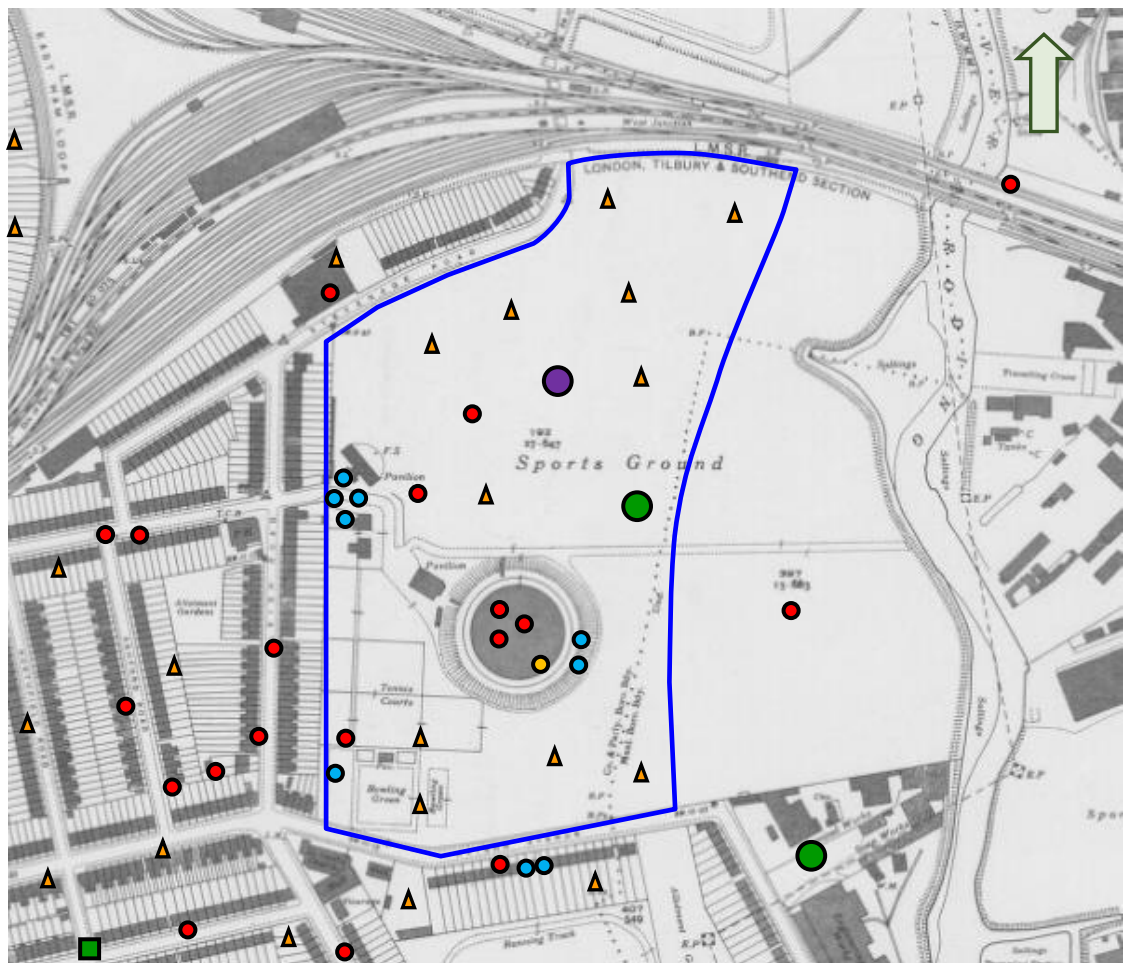
Southend Road, East Ham – UXO Desk Study & Risk Assessment

Drafted by Lucy Warwick
Checked by Stefan Lang
Authorised by Mike Sainsbury

Document Title UXO Desk Study & Risk Assessment
Document Ref. P6912-17-R2
Revision A
Project Location Southend Road, East Ham
Client Atkins
Date 5th July 2017

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Figure 3 Compiled bomb impact map for the vicinity of the Site



Source: © Crown Copyright 2017. Reproduced by permission of Ordnance Survey Not to scale

Legend	Site boundary	—	HE bomb	●	UXB	●	PM	■	OB	●	IBs	▲
	V1	●	V2	●								

Plate 6 is an aerial photograph dated the 2nd April 1946. It shows that the gasometer on the Site had been repaired after receiving bomb damage.

Areas of residual damage are evident in the immediate vicinity of the Site.

Appendix 4 - Photos of the Site

Figure 1 - Photograph taken from south-eastern corner into the site with the pedestrian footbridge and security fencing in foreground with gasholder and electricity pylon visible.



Figure 2 - Photograph taken from south of the site showing the gasholder and bund, and electricity pylon



Figure 3 – Photograph taken from south-west of the site showing the retained boundary wall with the gasholder partly visible.



Figure 4 - Photograph taken from south-western corner of the site showing the retained boundary wall, former pedestrian access (bricked up) and National Grid gated access (not currently used) with the gasholder partly-visible.



Figure 5 – Photograph of current site entrance from Southend Road (western boundary) to former East Ham Gasworks.



Figure 6 – Photograph taken from north of the site from Stevenage Road with wider site visible through the fence with gasholder, electricity pylon and elevated North Circular visible.



Figure 7 - Photograph taken from elevated southbound North Circular (east of the site) with electricity pylon and gasholder visible.

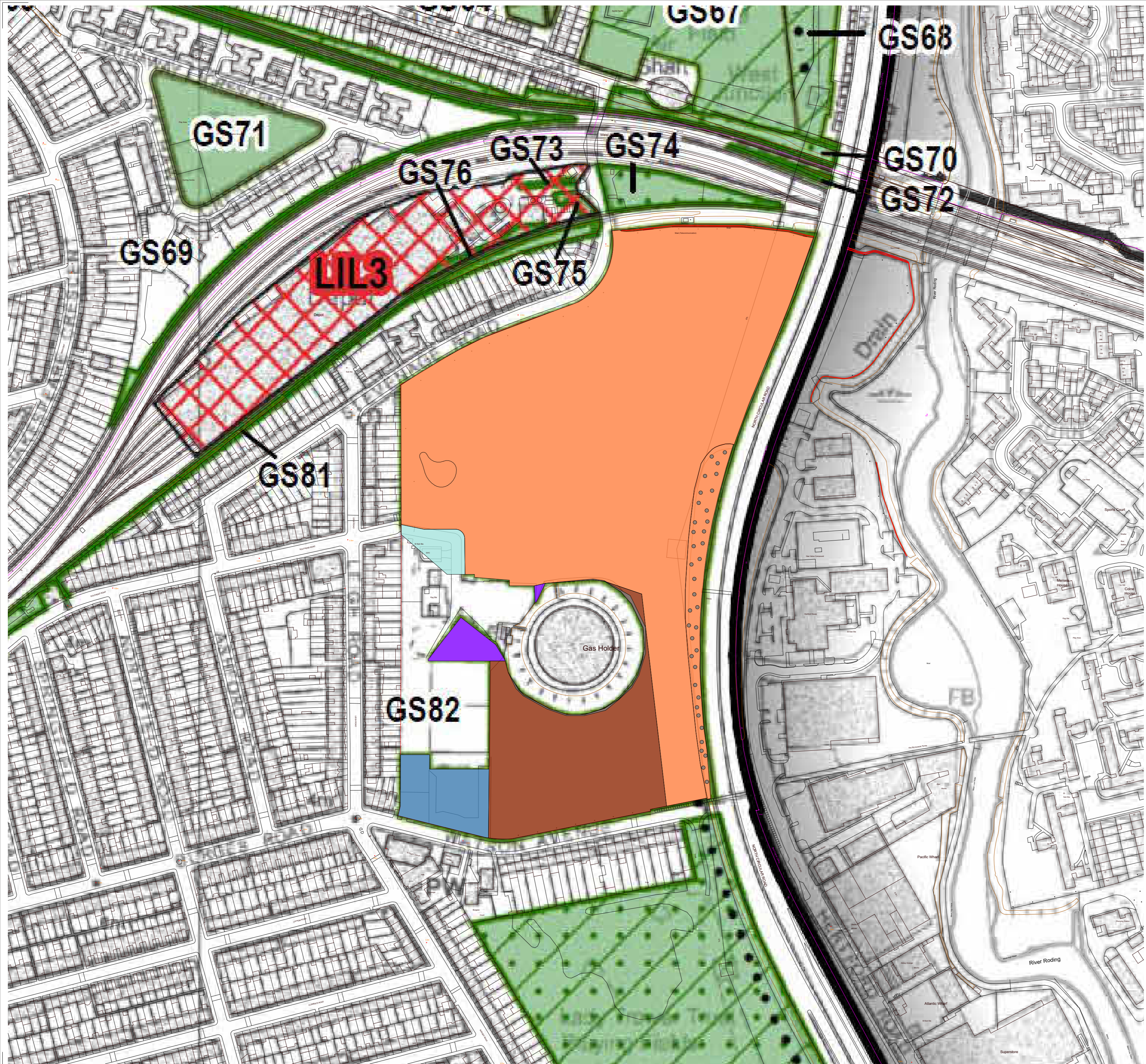


Figure 8 - Photograph taken from elevated northbound North Circular (north-east of the site) with the wider site, gasholder and electricity pylon visible.



Appendix 5 - Adopted Policies Map: Proposed MOL de-designation

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- Council proposed de-allocation = 0.12ha
- Parcel 1 proposed de-allocation = 0.34ha
- Parcel 2 proposed de-allocation = 1.4ha
- Residual MOL designation = 6.35ha
- MOL but outside St William ownership = 0.32ha
- New MOL Area = 0.12ha

Rev	Date	Description	Drawn	Chkd

Drawing Status
Draft

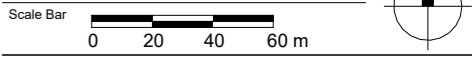
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St William



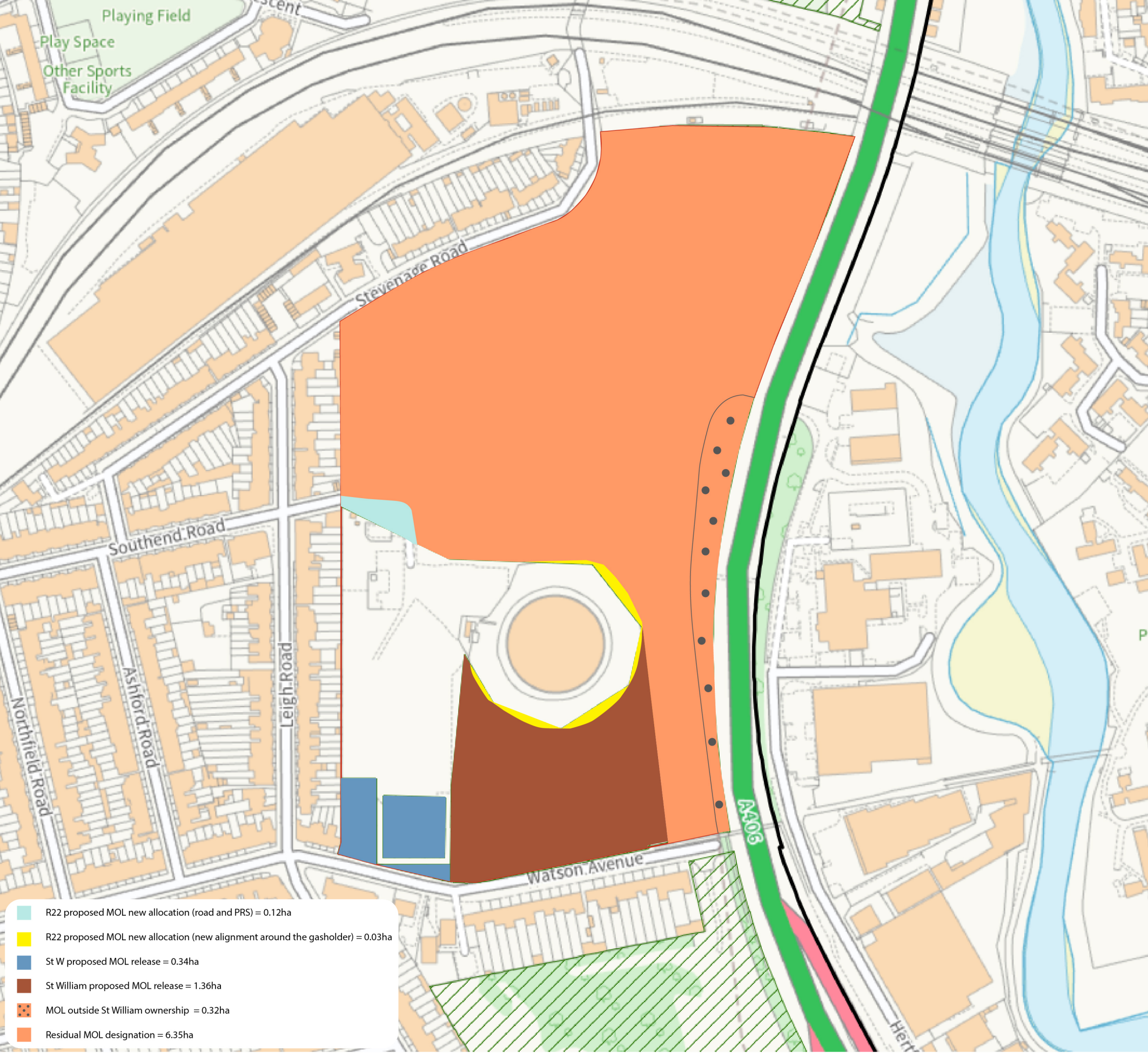
Project
Leigh Road Common

Drawing Title
Site Location Plan_MOL Allocation

Scale @A2 As indicated Job Ref. 02424
 Drawing No. 017 Revision.



Appendix 6 - R22 Policies Map: Proposed MOL de-designation



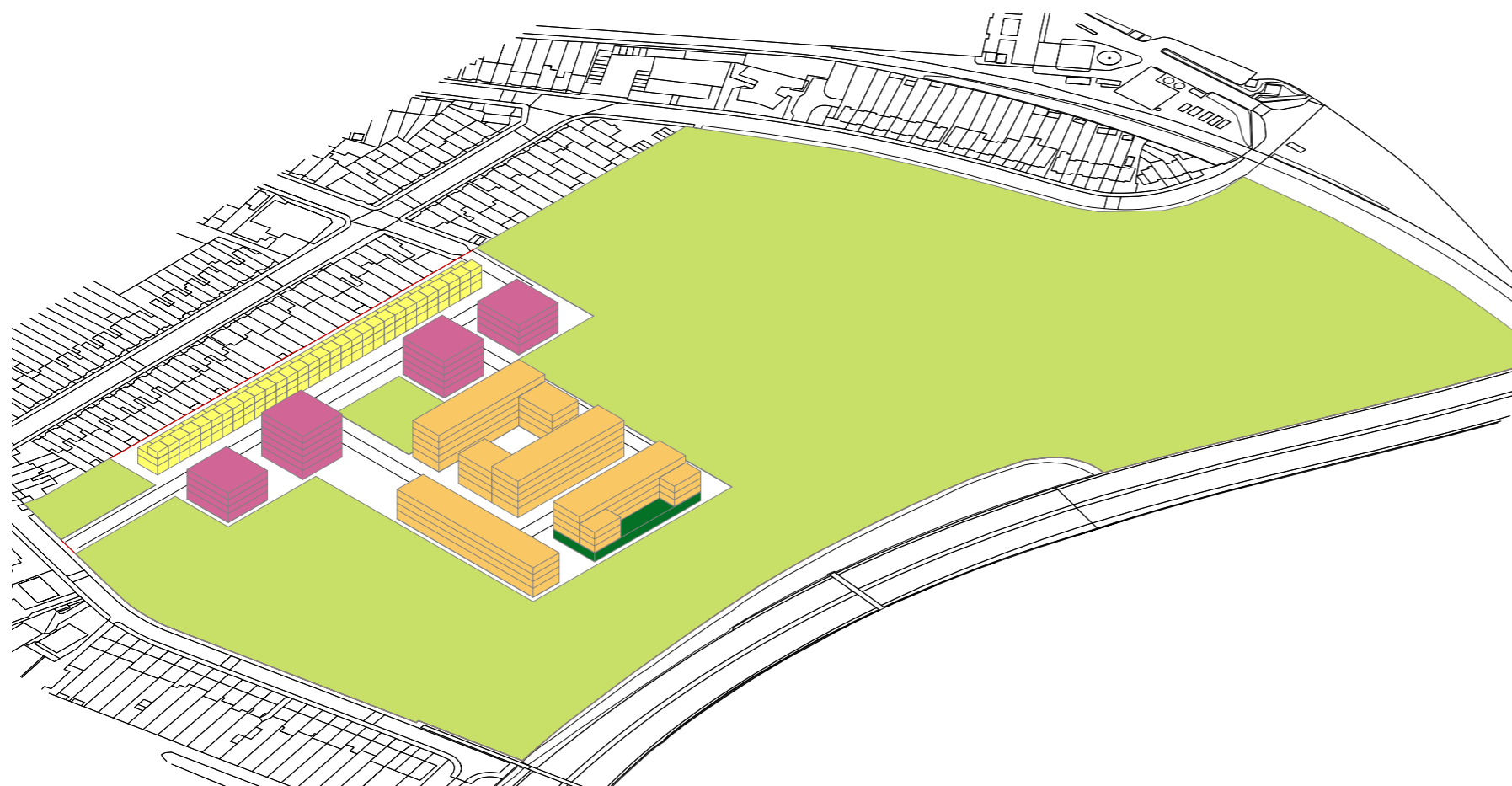
Appendix 7 - ED003A Indicative Scheme

1.20.5 Design Principles

- **Connected street network:** Proposals should establish a connected network of streets and spaces that stitches into the wider movement network, improving permeability and avoiding cul-de-sac and dead ends.
- **Street hierarchy:** Proposals should establish a street hierarchy through appropriate building line, street width, scale, massing, façade articulation and mix of uses that combine to characterise the different role and function of each street or space that any given elevation is fronting.
- **Positive public spaces:** Streets and spaces that are public or semi-public should be well-overlooked and have sense of enclosure provided by surrounding buildings and landscape. Façades should be animated with active ground floors fronting and animating the street level, with spaces well-integrated into layouts to avoid 'leftover' spaces.
- **Critical mass:** Proposals should contribute to establishing a critical mass at destinations including public transport hubs and town centres, optimising capacity through a design-led approach to establish footfall that supports services and amenities.
- **Layout, orientation and form:** Proposals should focus on maximising passive energy benefits of the sun and prevailing winds through careful consideration of building location, orientation, and compact building form.
- **Biodiversity and trees:** Proposals should improve existing habitats or create new habitats to achieve measurable gains for biodiversity, including meeting the Council's Urban Greening Factor criteria. This includes retaining and integrating existing green spaces and trees on site.

1.20.6 Urban Design Framework





- Community & Healthcare
- E-Commercial
- Education
- Employment
- Open space
- Residential linear block
- Residential terraced house
- Residential tower
- Residential urban villa
- Site boundary



1.20.7 Capacity Calculation

Tab 26 Schedule

N13.SA3 FORMER EAST HAM GASWORK	
Uses	GEA (sqm)
Residential	28,270
Community and healthcare	1,134
Green space	81,538

GLA Indicative Site Capacity Calculator

Capacity Calculator

Residential GEA*	28,270	m2
Non-residential	0	m2
Residential GIA	25,443	m2
Residential NIA	17,810	m2

Proposed average parking ratio:
 Proposed average circulation factor: 1.500
 Ground car floor parking factor: 0.330

* If fields are added to Digital Toolkit Record above, ensure formula for Residential GEA is

Tenure	Tenure Mix	NIA (m2)	Type	Type Mix	NDSS Area (m2)	Unit count without parking	Unit area including parking		Indicative Unit Count
Private	65%	11,577	Studio	5%	39	14.0	39.0	14.8	14
			1 bed	10%	50	23.0	50.0	23.2	23
			2 bed	45%	70	74.0	70.0	74.4	74
			3 bed	35%	86	47.0	86.0	47.1	47
			4 bed	5%	108	5.0	108.0	5.4	5
				100%	Total				163
Affordable (Intermediate)	12.25%	2,182	Studio	5%	39	2.0	39.0	0.0	0
			1 bed	10%	50	4.0	50.0	4.4	4
			2 bed	45%	70	14.0	70.0	14.0	14
			3 bed	35%	86	8.0	86.0	8.9	8
			4 bed	5%	108	1.0	108.0	1.0	1
				100%	Total				27
Affordable (Rented)	22.75%	4,052	Studio	5%	39	5.0	39.0	5.2	5
			1 bed	10%	50	8.0	50.0	8.1	8
			2 bed	45%	70	26.0	70.0	26.0	26
			3 bed	35%	86	16.0	86.0	16.5	16
			4 bed	5%	108	1.0	108.0	1.9	1
				100%	Total				56

Indicative Site Capacity

246

Indicative capacity impact of accommodating car parking

12

Notes:

- To be used in conjunction with the GLA Optimising Site Capacity: A Design-led Approach LPG
- Editable fields for data input are denoted in **white**. Figures shown are illustrative.
- GIA calculated as 90% of GEA
- NIA calculated as 70% of GIA (reduced ratio to allow for site and scheme variables that may impact capacity)
- Additional circular space is required in shared car parking areas to allow cars in and out of spaces. A conservative +50% has been assumed through an optimal layout, but more can be added for more complex layouts. No additional space is needed if spaces are on-street.

market affordable	<input type="text" value="65%"/>	65%
	<input type="text" value="35%"/>	
intermediate rent	<input type="text" value="35%"/>	12.3%
	<input type="text" value="65%"/>	22.8%
		100%

Appendix 8 - St William Indicative Schemes

East Ham Gas Works Option 1 Masterplan



Stevenage Road

A406

River Roding

Southend Road

Northfield Road

Ashford Road

Leigh Road

Burges Road

Watson Avenue

Hertford Road



East Ham Gas Works Option 2 Masterplan



Appendix 9 - N13 tracked changes

N13 East Ham

Neighbourhood profile

The East Ham neighbourhood is located in the east of the borough. It is bounded by Woodgrange Park Cemetery and the railway line to the north and the North Circular Road to the east. The railway line that runs east to west and High Street North which runs north to south cut across the neighbourhood. Barking Road runs east to west in the south of the neighbourhood, intersecting with High Street North and High Street South.

The neighbourhood is predominantly residential in character, consisting of terraced housing along gridded streets. East Ham is a Major Town Centre and is the third largest town centre in Newham. The East Ham Major Centre runs north to south along High Street North and eastwards from the junction with Barking Road. The major centre provides well known national retail chains along with a market and independent and specialised shops and food and drink offer. It also has a strong representation of financial and business services but there remains an extremely high number of betting shops and hot food takeaways.

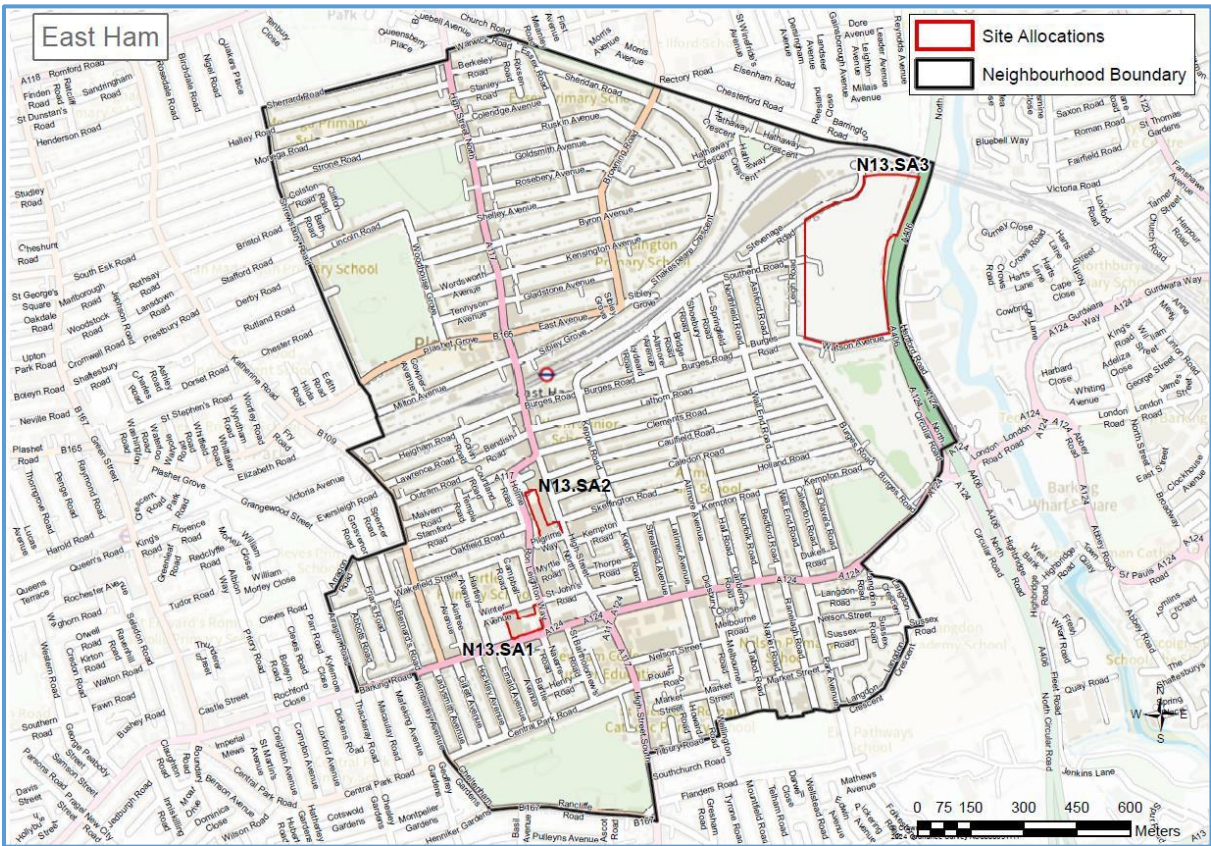
The neighbourhood has many listed buildings, with a concentration of listed buildings in the south of the neighbourhood on Barking Road and High Street South. These buildings are located in the East Ham Town Centre conservation area and include the Newham Town Hall and surrounding buildings. The East Ham, Manor Road to North Woolwich Roman Road, Newham Cemeteries and River Roding Archaeological Priority Areas are in the neighbourhood.

The neighbourhood also has a number of green spaces, including Central Park, Barking Road Recreation Ground, Plashet Park and Plashet Jewish Cemetery. Plashet Park and Central Park were awarded Green Flag awards in 2023. The green spaces on the eastern boundary of the neighbourhood are Metropolitan Open Land but not currently publicly accessible. ~~Many~~ Some¹ of these green spaces are also important for their nature and biodiversity significance. The neighbourhood falls within the Roding, Beam and Ingrebourne Catchment Partnership area which focuses on river and floodplain management, land management, land management and investment in the Roding, Beam and Ingrebourne catchments.

High Street North provides a local retail offer as does Katherine Road. The neighbourhood has 43 community facilities, including a number of civic buildings, higher education facilities, community centres and 28 places of worship. The neighbourhood's provision of community facilities is above the Newham average number of community facilities per km².

The neighbourhood has varied levels of public transport access, with the highest public transport accessibility levels around East Ham Station. The east of the neighbourhood has ~~poor~~ lower public transport accessibility. The main roads in the neighbourhood carry high levels of traffic resulting in high levels of noise and poor air quality. However, there are plans to improve the public realm on High Street North, including improved space for pedestrians, increased street greening, improved access to the market and changes to bus services.

¹ [EB068 Table 3 MOL Criteria C scores 16 of the 39 spaces as not meeting national or metropolitan value](#)



N13 East Ham policy

Vision

East Ham will have a successful and well-used major centre at its heart, with a growing variety of shops and facilities to serve the local community and visitors from the wider area. The East Ham Town Hall will become the council's first Data Campus, with education and employment facilities dedicated to the data and digital economy. The East Ham Major Centre's public realm will be improved to be welcoming, accessible and green and the level of traffic on the neighbourhood's main roads will be reduced. The neighbourhood's two thriving, vibrant and diverse local centres, Katherine Road South and High Street North, will complement the offer of the major centre.

The neighbourhood's heritage assets will be conserved and enhanced and growth in the neighbourhood will be delivered through the transformation of N13.SA1 East Ham Western Gateway and N13.SA2 East Ham Primark and through incremental change elsewhere in the neighbourhood which enhances the neighbourhood's existing character, including at N13.SA3 Former East Ham Gasworks.

The neighbourhood will have a network of legible, safe, green and accessible walking and cycling routes and public accessibility to the neighbourhood's green spaces will be viably increased, particularly along the edge of the River Roding.

The vision for East Ham will be achieved by:

1. supporting development in 'enhance' areas that enhances the neighbourhood's character and is sympathetic to and respects the character of its historic terraced streets through

- form, detailing and materials. ~~Moderate~~ uplift in density will be supported, particularly in areas of mixed-urban form or fragmented character, where it enhances the character of the area and follows the block structure of the consolidated urban fabric;
2. supporting development that transforms N13.SA1 East Ham Western Gateway and N13.SA2 East Ham Primark whilst contributing to the character of the East Ham Major Centre;
 3. supporting development that conserves the character of the East Ham conservation area and the neighbourhood's heritage assets, through sympathetic form, materials, detail, landscaping and public realm enhancements;
 4. supporting tall buildings [at N13.SA3 Former East Ham Gasworks and](#) in accordance with the East Ham Tall Building Zone and Local Plan Policy D4, having significant regard to the neighbourhood's heritage assets;
 5. supporting the role of East Ham Major Centre in servicing the retail, leisure, civic, community and service needs of the borough and protecting its specialised character, by supporting a diverse mix of uses and:
 - a. protecting and enhancing the role of the reconfigured East Ham Market hall and the street market and supporting the animation of the town centre through temporary and permanent markets and cultural events and activities;
 - b. supporting an enhanced retail and leisure offer within the Primary Shopping Area, including a new small to medium food store to meet local need and an uplift in leisure floorspace to support development of a local evening and night-time economy;
 - c. improving the public realm on High Street North through improvement in the quality of pavements, including widening, green infrastructure and activation through well designed and placed furniture and street lighting and improved conditions for walking and cycling;
 6. maintaining the role of the Katherine Road South and High Street North Local Centres by supporting a diverse mix of uses to serve the local catchment needs for retail, services, leisure and community uses;
 7. supporting new community facilities when in conformity with Local Plan Policy SI2;
 8. protecting existing and delivering new small scale employment floorspace to increase local economic opportunities as part of the network of well-connected employment uses, particularly smaller flexible industrial spaces and workshops with ancillary offices for small and medium enterprises and micro businesses;
 9. improving conditions for walking, cycling and public transport by:
 - a. supporting bus priority measures on Barking Road, Ron Leighton Way, High Street North and High Street South;
 - b. supporting the implementation of Low Traffic Neighbourhoods and new and improved modal filters;
 - c. supporting the provision of the Barking Road (Canning Town to Barking), River Roding Corridor, High Street North (Manor Park to East Ham) and High Street South (East Ham to North Woolwich) Strategic Cycling Corridors;
 - d. requiring and supporting improved walking routes within and linking to the major centre and improved crossings, particularly on north to south on High Street North;
 10. retaining existing mature trees and maximising the provision of new ~~open~~ **green** space, green infrastructure and green links and the opportunities to increase biodiversity, including through improvements to Central Park to improve biodiversity and the use of street trees particularly on High Street North, High Street South, East Avenue, North Field Road, Shelly Avenue, and Park Avenue and the use of Sustainable Urban Drainage Systems, particularly on High Street North and Church Road/First Avenue;
 11. securing public access to green and water spaces currently inaccessible to the public, particularly through walking and cycling routes along the River Roding in partnership with the London Boroughs of Redbridge and Barking and Dagenham and at N13.SA3 Former East Ham Gasworks and supporting the [viable](#) restoration of the Back River;

12. protecting and supporting enhancements to playing pitches and sports courts at Central Park, Plashet School, Plashet Park and Lady Trowers Trust Playing Field and [the former cricket pitch](#) N13.SA3 Former East Ham Gasworks and supporting a PlayZone at Central Park;
13. improving air quality and reducing exposure to poor air quality, particularly in the Air Quality Focus Area and along the North Circular Road, Ron Leighton Way, High Street South and

Sites

- N13.SA1 East Ham Western Gateway
- N13.SA2 East Ham Primark
- N13.SA3 Former East Ham Gasworks

Appendix 10 - N13.SA3 tracked changes

N13.SA3 Former East Ham Gasworks	
Site address	Former East Ham Sports Ground Leigh Road, East Ham E6 2BP .
Neighbourhood	East Ham
Site area	10.3 hectares
Public Transport Accessibility Level	0 – 3
Flood Risk	<p>The site is shown to be at significant risk of flooding in Flood Zone 3 and Flood Zone 2, as well as being at pluvial flood risk in the 1% and 0.1% AEP events and also being at risk if the Thames were to breach its bank and defences were to fail.</p> <p>Subsequent to the publication of the SFRA, the Environment Agency has undertaken further flood risk modelling of the River Roding. This modelling should be used for any site specific flood risk assessment of the site.</p>
Utilities	Surplus utility site ; Overhead Transmission Line Route and National Grid Electricity Pylon (50m) ; gas mains; gas easements; Thames water sewer; trunk water main; gasholder 46.90m AOD or c.15 storeys equivalent, dumping and tank (-4.50m below ground level).
Heritage Designations	River Roding Archaeological Priority Area (Tier 3)
Natural environment Designations	<p>In an area of deficiency of access to all types of Parks, except the southern half of the site which is within the catchment for Barking Road Recreation Ground Local Park and of under provision to publicly accessible open green space by head of population in 2038.</p> <p>Metropolitan Open Land and Former Leigh Road Sports Ground Sites of Importance for Nature Conservation</p> <p>Air Quality Management Area</p> <p>Source Protection Zone 2</p>
Map	[insert map revisions]

Existing uses	<u>Contaminated Former-former gasholders gas works</u> and associated infrastructure ¹ ; <u>electricity pylon and overhead lines</u> ; and <u>open green space</u> currently inaccessible to the public, which includes <u>a disused playing-cricket pitch</u> ² .
Development principles	<p>Residential, open <u>viable publicly accessible green space</u> and <u>sports / community facility</u>.</p> <p><u>Development should acknowledge the associated costs of decommissioning the gasworks and the relocation of any significant equipment and address any environmental pollution and on site decontamination requirements caused by the gasworks</u>³.</p> <p><u>Development must also consider and mitigate existing contamination as well as prevent any further contamination of water or land.</u></p> <p>Development should take place on the part of the site outside the Metropolitan Open Land <u>unless very special circumstances indicate otherwise</u>. Development should <u>contribute to achieving the purposes of the protect the openness of the adjacent Metropolitan Open Land in accordance with London Plan Policy G3 and maintain the site’s role in providing-provide a continuous chain of publicly accessible green open space</u> along Newham’s eastern boundary.</p> <p>Development should explore <u>a viable solution for the</u> restoration of the Back River.</p> <p>Development should protect, enhance and bring back into <u>viable</u> public use the disused cricket sports-pitches in the Metropolitan Open Land in accordance with Local Plan Policy GWS1.</p> <p>Development should address the need for community facilities by delivering a new community facility with a local neighbourhood appeal (smaller than 1,000 sqm Gross Internal Area), unless it can be demonstrated that the needs of the community have already been met. Development should consider of all types of community facility, as set out in the Community Facilities Needs Assessment (2022) evidence base. Any provision of community facilities should meet the requirements of Local Plan Policies SI2 and SI3.</p> <p>Development proposals should ensure that flood risk is minimised, mitigated and informed by a site-specific Flood Risk Assessment, as per Local Plan policy CE7 and informed by the Strategic Flood Risk Assessment Level 2 Site Assessment (2023) (2025).</p>

¹ R22 page 321: This includes contaminated land and the remnants of industrial use such as gasholders. Without land remediation and amelioration of environmental degradation prior to development, a site may not be viable or may even be harmful to future residents or occupiers.

² EBO46 page 27 & 29 “whilst a disused grass wicket square is identified at Leigh Road Gasworks Sports Ground” & “There is a disused cricket square at Leigh Road Gasworks Sport Ground. To increase provision in Newham, one option could be to explore reinstating this, although it is unknown as to how feasible this is.” and Table 6.1: Site by site Action Plan.

³ Tower Hamlets adopted Local Plan site allocation for gas works sites (Bow Common and Leven Road)

Design principles	<p>The site should be designed and developed comprehensively in accordance with Local Plan Policy BFN2.</p> <p><u>Tall buildings up to 15 storeys reflective of the height of the gasholder within a similar location. Mid-rise residential buildings below 21m (ca. 7 storeys) and Mid-rise residential buildings c. 21m (ca. 7 storeys)</u> are the most appropriate form of development which sensitively integrate with the scale and massing of the existing urban fabric. Massing should step down towards the <u>east-west</u> of the site to sensitively integrate with the existing two storey terraces on Leigh Road.</p> <p>The design and layout of the site should establish a connected network of streets and spaces and that connects into the existing street network and should create a street hierarchy. Routes to, from and through the site should improve access and connectivity to and along the River Roding and through the site from Southend Road through to Watson Avenue. The community facility should be located where there are good connections to the existing street network and in proximity to the open space.</p> <p>The layout of the site should protect the Site of Importance for Nature Conservation.</p>
	<p>Design measures should minimise exposure to poor air quality in accordance with Local Plan Policy CE6.</p> <p>The design and layout of the site should take into consideration the electricity pylons on the eastern boundary of the site and the existing overhead transmission line route, and minimise the impact of noise from any required Pressure Reduction System on residential amenity.</p> <p>The design and layout of the site should take account of risk of flooding from all sources and meet the requirements of Local Plan Policy CE7. Sustainable drainage should be considered from the outset and meet the requirements of Local Plan Policy CE8.</p>
Infrastructure requirements	<p><u>An assessment should be carried out to understand the potential contamination on site prior to any development taking place⁴.</u></p> <p><u>An assessment should be carried out to understand and remove the risk posed by Unexploded Ordnance ('UXB').</u></p> <p>Development should <u>viably</u> address existing open green space deficiency by retaining the Metropolitan Open Land and <u>makemaking</u> it publicly accessible.</p> <p>The open green space provision should prioritise community growing opportunities as well as publicly accessible play space in the form of a Locally Equipped Area for Play. Development should also provide play space in the form of a Local Area for Play which should be playable public realm. Play space should meet the requirements of Local Plan Policy GWS5.</p> <p>Development should retain the gas governor on site.</p>

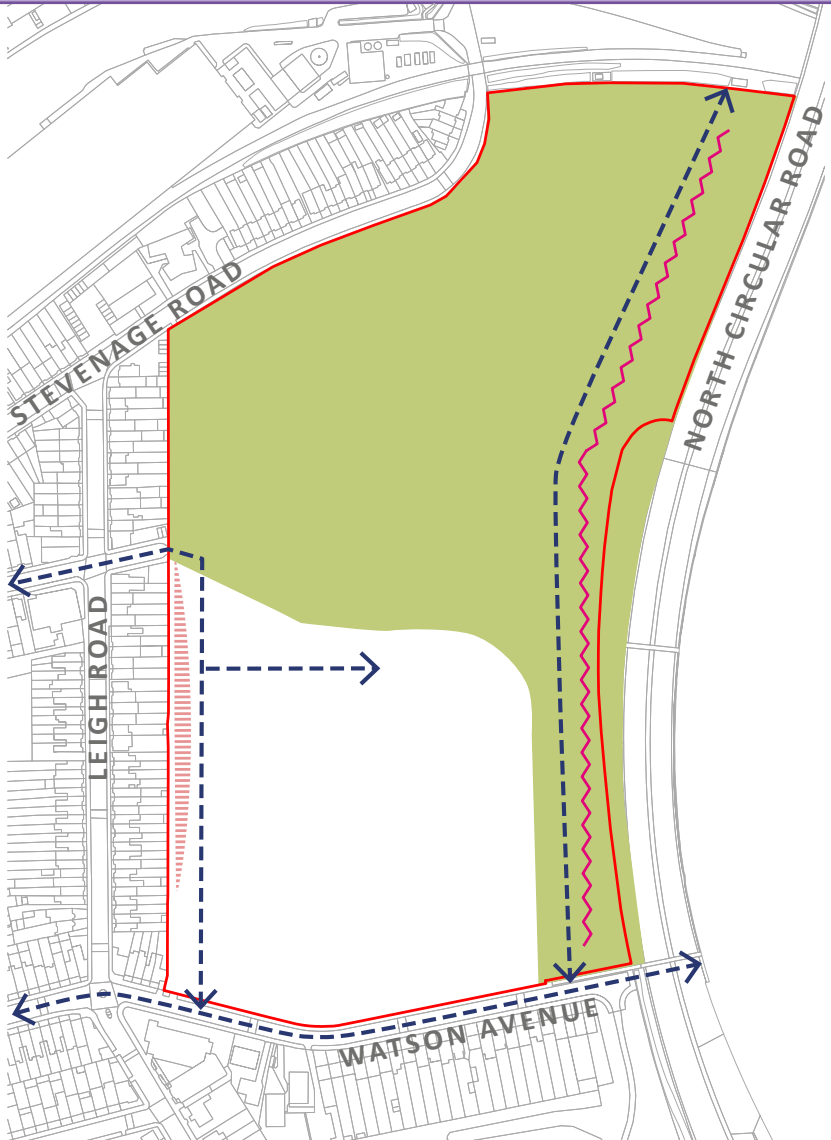
⁴ [Tower Hamlets adopted Local Plan site allocation for gas works sites \(Bow Common and Leven Road\)](#)

<p>Phasing and implementation</p>	<p>Phasing of the site should take account of the likely requirement for water supply and wastewater infrastructure upgrades through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.</p> <p>The potential impact of the overhead transmission line on design and layout should be taken into account at the pre-application stage through early engagement with National Grid.</p> <p>Medium to long term</p>
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Appendix 11 - Revised N13.SA3 Plan

N13.SA3 Former East Ham Gasworks

Map



Key:

- Site boundary
- - - Key route
- ▨ Sensitive edge (heritage assets - low rise context)
- ~ Sensitive edge (noise - pollution - infrastructure)
- Opportunity for green space

Appendix 12 - Summary of St William representations to the R22 plan

Summary Representations to R22 Plan

- 1.1 To ensure that these representations are read in context, we summarise the relevant representations made by St William to the plan as a whole, in response to Matthew Pennycook MP's letter to Paul Morrison Chief Executive of the Planning Inspectorate on 9th October 2025
- 1.2 Mr Pennycook stated the following:
 - 1.2.1 This government is determined to make rapid progress toward universal local plan coverage.
 - 1.2.2 The plan-led approach is, and must remain, the cornerstone of our planning system.
 - 1.2.3 It is through local plans that communities can best shape decisions about how to deliver the housing and wider development their areas need.
 - 1.2.4 Local Plans provide the necessary certainty and confidence for the sector to bring forward the development required across the country.
 - 1.2.5 The final set of local plans being delivered within the current system remain essential to facilitating the effective delivery of housing, jobs and infrastructure.
 - 1.2.6 It is therefore critical that Inspectors approach examinations of current system plans with the appropriate degree of flexibility.
 - 1.2.7 I very much welcome that in some cases Inspectors are already exercising a degree of flexibility to expedite adoption of local plans.
 - 1.2.8 I note recent pragmatic decisions to proceed toward adoption in instances where a five-year housing land supply cannot be evidenced at the point of adoption but where the plan significantly boosts supply and still meets housing needs over the plan period.
 - 1.2.9 Whether proportionate evidence has been provided or considering whether stepped housing requirements may be justified.
 - 1.2.10 It remains important that we do not see the adoption of poor-quality plans.
 - 1.2.11 Where plans are capable of being made adoptable, I want Inspectors to seek to do so in the examination process.
- 1.3 We support the principle that plans which are capable of being adopted, should be, where the plan significantly boosts housing supply. We agree that poor-quality plans should be resisted. We agree with Mr Pennycook that flexibility and pragmatism is at the heart of the process to give confidence to communities that the housing and wider development their area needs will be delivered. We agree that it provides the necessary certainty and confidence for the sector to bring forward the effective delivery of housing, jobs and infrastructure.

- 1.4 Mr Pennycook has advised that it is critical that Inspectors apply the appropriate degree of flexibility. We agree, which is why we promote flexibility within this plan to facilitate housing delivery.
- 1.5 This is necessary because:
- 1.5.1 The previous plan (upon which the draft Local Plan is based) failed to successfully create a planning framework to achieve the minimum threshold of 75% Housing Delivery Test.
 - 1.5.2 The Council cannot demonstrate a 5-year housing land supply (5YHLS) of deliverable sites.
 - 1.5.3 The policies of the plan are out of date¹.
 - 1.5.4 The presumption in favour of sustainable development is engaged.
 - 1.5.5 The Mayor of London² has confirmed that “the current London Plan does not meet London’s identified need” and is working towards “delivering 88,000 homes per annum as calculated at a national level through the standard method”, a material consideration.
 - 1.5.6 Whilst local plans should be in general conformity³ with the London Plan, the London Plan is now dated as it does not meet London’s housing need. The Framework⁴ requires the London Plan to be reviewed and completed no later than five years from adoption e.g. by March 2026, particularly where housing need figures have changed significantly. This requirement has not been met.
 - 1.5.7 The Mayor of London⁵ has advised that paragraph 4.1.11 of the London Plan is “now considered out of date”. It should not be relied upon to reduce housing capacity over the plan period.
 - 1.5.8 The housing targets in the draft Local Plan may only be in place for a short period, and will be out of date once the London Plan is adopted. The Mayor of London has advised that “it is recommended that there is flexibility in the draft Plan to safeguard this eventuality”.
 - 1.5.9 The draft Local Plan does not seek to meet the Government’s standard method of housing which identifies a greater housing need.
 - 1.5.10 The Whole Plan Viability Assessment which supports the draft Local Plan cannot demonstrate viability of the cumulative policies of the plan, does not support the threshold approach to affordable housing for the majority of sites, has not tested

¹ Framework paragraph 11 d)

² GLA representations to Camden R19 Local Plan, 12th June 2025

³ Section 24 of the Planning and Compulsory Purchase Act 2004 as amended

⁴ Framework paragraph 34

⁵ GLA representations to Camden R19 Local Plan, 12th June 2025

strategic sites in the borough and promotes site specific viability assessments to overcome delivery challenges.

1.5.11 MHCLG and the Mayor of London introduced in principle a package of support for consultation of housebuilding in the capital on 23rd October 2025 which relates to planning permissions issued before 31st March 2028, and construction at 1st floor level built by 31st March 2030. The paper refers to delivery into the next decade This renders the draft Local Plan affordable housing policies superseded for this period. Once the period ends, the new London Plan is expected to be adopted, and the new London Plan housing figures will apply.

1.5.12 The MHCLG and the Mayor of London stimulus note recognises that Mayoral guidance has constrained density and viability. It withdraws LPG guidance on dual aspect, dwellings per core and reduces cycle parkin requirements.

1.6 We therefore propose the following amendments to ensure that the plan is *sound* and flexibility reacts to these material considerations:

1.6.1 As per the MHCLG and the Mayor of London note, recognition that there is a housing emergency, housing is the priority use, housebuilding in the capital has faced significant challenges over recent years – including the impact of the Covid-19 pandemic, high interest rates, spiralling construction costs, regulatory blockers and wider economic conditions. The Government’s drive is to build 1.5 million new homes in this Parliament and the viability of housing developments in the near term needs to improve.

1.6.2 The presumption in favour of sustainable development should be written into the plan, acknowledging that it does not have a 5YHLS, and has failed the HDT at the point of production.

1.6.3 The standard method of housing need annual requirement is written into the plan and acknowledged as a housing need figure and a material consideration.

1.6.4 The plan includes the reference to, or inclusion of the package of support for house building.

1.6.5 The affordable housing policy gives equal weight to the threshold approach; and the viability tested route and the level of affordable housing arising from either approach.

1.6.6 Substantial weight is given to housing delivery. This weight is applied to market housing and all forms of affordable housing alike.

1.6.7 Paragraph 125 c) of the Framework is written into the plan ‘give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused’.

- 1.6.8 As per Mayor of London advice⁶ removal of “maximum” building heights, and use of “appropriate” building heights as per London Plan Policy D9. Recognition that the appropriate building heights have not been viability tested and are based on a borough wide tall building assessment which does not and cannot undertake an assessment as detailed and balanced as a planning application.
- 1.6.9 Recognition that the Whole Plan Viability Assessment upon which policies of the plan are based (1) does not demonstrate deliverability of the AH threshold proposed for the majority of sites (2) excludes abnormal costs which are incurred with the majority of brownfield site development (3) has not viability tested strategic sites which are key to delivering the Council’s priorities as required by the PPG⁷ (4) advocates use of the viability tested route because of viability concerns (5) weight should be applied to viability assessments⁸.
- 1.6.10 Inflexible policies relating to housing mix should be revised.
- 1.6.11 Policies which constrain delivery and viability (dual aspect, homes per core and cycle parking are removed or revised).
- 1.6.12 Use of the wording accepted by the local plan inspectors for Tower Hamlets Local Plan Policy D.SG5 wording to ensure site allocation deliverability “For site allocations, the policies set out in this plan may be applied flexibly to ensure that the sites are viable and deliverable”.
- 1.6.13 Each gasworks site should contain the same relevant wording:
- An assessment should be carried out to understand the potential contamination on site prior to any development taking place.
 - Development should acknowledge the associated costs of decommissioning the gasworks and the relocation of any significant equipment and address any environmental pollution and on-site decontamination requirements caused by the gasworks (Tower Hamlets Bow Common / Leven Road – Site Allocation).
 - Development must also consider and mitigate existing contamination as well as prevent any further contamination of water or land.

⁶ GLA representations to Hounslow R19 local plan, 25th October 2024

⁷ Paragraph: 005 reference ID: 0-005-20180724

⁸ Framework paragraph 59

EB058 Site Allocation and Housing Trajectory Methodology Note (June 2025)

1.7 Section 4.7 of EB058 confirms the following matters:-

- 1.7.1 Newham is unable to demonstrate a 5-year housing land supply when measured against the adopted London Plan housing target (2021); + 20% buffer and taking into account previous shortfalls (the Sedgefield approach) (4.7.1).
- 1.7.2 Newham doesn't have a 5YHLS, and has failed its HDT, the last up to March 2023 showing only a 61% delivery rate. Of the 2,445dpa on average required, 1,488dpa have been delivered. The presumption therefore applies.
- 1.7.3 Taking the shortfall and buffer into consideration Newham only has a land supply of 2.22 years. (4.7.2)
- 1.7.4 Over the next 5 years, Newham has a deficit of 20,762 homes (Table 12).
- 1.7.5 Newham does not have sufficient identified housing capacity to meet the Borough's London Plan housing requirement over the course of the London Plan period, with a shortfall of 16,278 units. (4.7.2)
- 1.7.6 Newham's housing delivery has consistently fallen below the annualised housing requirement figure in the 2021 London Plan.
- 1.7.7 The Council accept that there have been significant delays to anticipated completion date for site allocations. Delays to completions expectations including and beyond 5 years are for reasons including market conditions affecting the viability of scheme delivery (for more information see the discussion of the London Housing Delivery Taskforce findings below at paragraph 4.8.8); more extensive co-design with residents and being subject to resident ballots; resource gaps in the public sector delaying the delivery of sites that are publicly owned; large-scale site allocations requiring the delivery of supporting infrastructure delivery to facilitate high density residential development; and the Council assuming more realistic phasing of sites with complex land ownerships, which will require master-planning discussions with a range of landowners. (4.8.4). We note that the Council does not include its own policies as a constraint to development.
- 1.7.8 The Council is now assuming housing delivery rates of between 150 and 200 units per annum per site to more closely reflect historic delivery trends in the borough's new housing trajectory, reflective of the guidance in the PPG (Paragraph: 022 Reference ID: 68-031-20190722) to consider "developers' past performance on delivery". (4.8.4)
- 1.7.9 In view of the changes in the national policy context, namely the publication of the Local Housing Need figure for London being 87,992 homes per annum, the GLA have clarified that any previous advice prior to the publication of London's new housing need figure is to be considered out-of-date, recognising the importance of maximising housing delivery to meet London's housing need figure in future years. (4.8.5)

1.7.10 Notwithstanding the GLA's concerns, the Council considers that our approach to site phasing provides a realistic housing requirement figure, based on an up-to-date assessment of deliverable sites and their phasing. (4.8.6)

1.8 We understand that the GLA are considering their non-conformity letter to the Council.

Strategic Considerations for the EIP

1.9 The Newham Local Plan was adopted in 2018, on the back of a policy document and whole plan viability assessment which gave rise to considerable concerns regarding deliverability and excessive burdens on development in respect of affordable housing, larger homes and building height limitations. In fact, the same was also true for the London Plan.

1.10 In retrospect, both documents could be considered '*unsound*' as they have failed to achieve 'as a minimum' the 'area's objectively assessed needs'⁹ and have been ineffective, lacking delivery¹⁰.

1.11 The Newham plan is now 8 years old, and the London Plan nearly 5 years old.

1.12 Paragraph 34 of the Framework requires local plans and the London Plan to be reviewed to assess whether they need updating at least once every five years, and they should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future. Footnote 19 of the Framework states that reviews at least every five years are a legal requirement for all local plans (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012). Both plans have failed in this regard.

1.13 For London, the 2017 SHLAA sought 66,000dpa, the adopted London Plan c.52,000dpa, and the need is currently 88,000dpa, but on average we have seen c.34,000dpa delivered, more recently falling off a cliff. The London Plan AMR KPI of 17,000 affordable dpa has never been reached since 2004, the average being 6,000dpa¹¹ in the ten years up to 2021/22 before the GLA stopped issuing its AMR.

1.14 Yet despite this, borough local plans must be in 'general conformity' with the London Plan¹², and the recent Framework transitional arrangements (Annex 1) exclude the current Framework from biting if the Council's R19 plan was issued on or before the 12th March 2025, where there is 'an operative' SDS in place e.g. the London Plan. This appears to be the case even where the London Plan is also failing to deliver which may be considered perverse.

1.15 Furthermore, The Council's response (ED002) to FPQ1 (IN2.1) confirms that approximately 60 different information requirements are embedded within the Plan's policies to support a planning application. This approach is not effective nor sound in the context of paragraph 45 of the NPPF which states that local authorities "*should only request supporting information that is relevant, necessary and material to the application*" and "*should be kept to a minimum*". In

⁹ Framework Paragraph 36 'positively prepared'

¹⁰ Framework Paragraph 36 'effective'

¹¹ London Plan AMR 18 2020/21, dated March 2023

¹² Section 24(1)(b) of the Planning and Compulsory Purchase Act 2004

line with our representations, the prescriptive information requirements should be removed from the Plan and dealt with via a separate validation checklist. Over 60 different information requirements is unmanageable, delays determination and delivery and places unreasonable burdens on the LPA and applicants.

- 1.16 Since adoption of these plans, development economics have worsened with Brexit, COVID and global conflict. Specifically for London, there have been significant changes in development economics at the site level due to regulatory changes and other matters including build cost inflation; Part L energy / carbon; Part F & O ventilation; Part S electric car charging; Part B 2nd stair and fire safety including Fire Safety Regulations (BS9991); Part P electrical safety; 2nd stair efficiency; finance costs, taxation increases and net zero carbon contributions.
- 1.17 CIL levies have also increased dramatically with inflation. The 2014 adopted borough rate of £80 for Newham and MCIL (2019) rate of £25, is now £187.80 (as of 10th April 2025), with index and the Building Safety Levy Rate of £23.61 for PDL, nearly a 100% increase.
- 1.18 Despite all of this before us, and the rallying cries from the Prime Minister and Deputy Leader and Secretary of State for Housing, Communities and Local Government to '*get Britain building now*', the R22 Local Plan submission is drafted to repeat the failures of the last 8 years again, to constrain housing development, for the following reasons:
 - 1.18.1 The GLA and others objected to Newham not being able to meet its 2021 London Plan housing target within the London Plan period, despite this the Council argue that '*A change to this policy approach has not been made, as Newham has more than enough capacity to meet the London Plan housing target, albeit because of delays to site allocation delivery we won't be able to meet our London Plan target until 2033/34.*'
 - 1.18.2 The GLA objected to Newham lowering its housing target in the years beyond the London Plan period. Despite this the Council advise that "*A change to this policy approach has not been made, as we consider our approach to be in conformity with the requirements set out in the London Plan. Once Newham have met the London Plan housing target, capacity is based on the 2017 SHLAA*".
 - 1.18.3 The GLA and developers expressed strong opposition to the affordable housing target, in particularly the need to deliver 50% social rent homes. They highlighted the significant viability challenges associated with delivering a high percentage of affordable housing. Despite this, the Council advised that "*A change in this policy approach has not been made, as the affordable housing target seeks to meet identified need for social rent homes, the evidence for which is demonstrated by our strategic housing market assessment and the fact that Newham has the highest number of residents in temporary accommodation in the country. We consider that as economic circumstances improve, the policy will become easier to deliver over the plan period. The policy also allows for the submission of a viability assessment where the targets cannot be met, thereby helping to ensure the policy is effective and deliverable. The Council is satisfied that the plan remains sound without the proposed changes*". It therefore proposes a new requirement for 50% of the total residential units as social rent housing and 10% of the total residential units as affordable home ownership housing equating to an overall requirement for 60% of residential units to be provided as affordable homes on each development site. (Policy H1)

- 1.18.4 Applicants are expected to deliver all policy requirements and related obligations outlined in the Plan. (MinM24)
- 1.18.5 The requirement for 40% of homes to be delivered as family sized homes (3 bedrooms or more). (Policy H3)
- 1.18.6 Developments on site allocations (identified in the Neighbourhoods chapter section of the Local Plan) should aim to deliver a minimum of 5% of proposed homes as four or more bedroom affordable dwellinghouses. (MinM103)
- 1.18.7 Viability review mechanisms are promoted for use in s.106 contributions (Policy BFN4: Developer contributions and infrastructure delivery).
- 1.18.8 BNPP has prepared a Whole Plan Viability Assessment (April 2024) ('WPVA'), which tests the financial impact of the increased target to 60% amongst other policy requirements for tenure, design, sustainability and s106 contributions. The conclusions of the viability report evidence that the 60% target is not viable and deliverable, and a number of sites are not viable at lower percentages once other policy requirements are included. This evidences that the 60% target is not a deliverable threshold, and therefore all schemes would need to follow the viability tested route. This is considered to be contrary to planning practice guidance (Reference ID: 23b-005-201903315) and the NPPF Paragraph 31 and Paragraph 58 as the viability is not proportionate and undermines the deliverability of the plan.
- 1.18.9 Additionally, the BNPPRE Cumulative Policy Viability Assessment (EB099) confirms that only 7 of 142 typologies (4.9%) tested were viable and deliverable with 60% affordable housing and the cumulative cost of other policy requirements, on developed land, rising to just 13 of 142 (9.2%) on cleared land (Tables 6.60.4–6.60.6). This includes all large site typologies, which are expected to deliver the majority of the borough's housing trajectory.
- 1.18.10 The Council's own evidence therefore confirms that, without flexibility, cumulative policy costs will render most schemes unviable, undermining overall deliverability against the key policy objectives of the plan. This is before any adjustment is made to make allowances for abnormal costs and/or more realistic market-based inputs.
- 1.18.11 EB099's own analysis (Tables 6.60.1–6.60.3) shows that when affordable housing is reduced to 35%, viability outcomes improve materially, despite this, many of the tested typologies remain unviable with 35% affordable housing. Again, this is before any adjustment is made to make allowances for abnormal costs and/or more realistic market-based inputs.
- 1.18.12 The Local Plan Viability Assessment (and draft Policy H3) fail to acknowledge exceptional abnormal costs. Paragraph 4.39 states that exceptional costs have not been included, but these costs are significant, and it is considered that this detail needs to be included within the Site Specific sites tested. Excluding exceptional costs on site specific allocations where abnormal costs are known, is presenting a viable outcome that is incorrect and artificial, inflating the viable amount of affordable housing that can be provided on these sites.

1.18.13 The Local Plan Viability Assessment also uses inputs and outputs that lack credibility and overinflate site deliverability, which have now been proven to be incorrect given the acute housing delivery issues in the borough. Notably the build costs do not reflect realistic and predictable costs, and there is an over reliance on BCIS. For buildings of above 6 storeys an additional cost for height needs to be added. It is also unrealistic for buildings to be built with a psft rate of less than £300psf (taking account of all additional policy requirements). This is not reflective of current and forecast market conditions. The finance rate of 6% does not reflect current market conditions and there is limited commentary on profit, with no reference to commercial profit, or where it is appropriate to consider alternative measures like IRR. The assumptions regarding s.106 contributions are fundamentally different from those sought by LBN via the development management process.

1.18.14 Objectors stated that some tall building zones are too restrictive and do not reflect the neighbourhood's local context. The Council consider that *'change is not necessary as the locations and heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets informed by the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025).'*

- 1.19 Despite extensive representations, including from the Mayor of London, the R22 plan has not materially changed from R19.
- 1.20 Taking us back to the *'common sense test'*, it is very clear that the approach being taken is not sound and will compound delivery issues.
- 1.21 The problem is that the Council consistently apply the policy lever at the application stage viability tested route as mitigation should an applicant not be able to deliver the 60% affordable housing threshold + CIL + the various development standards and policies set out in the local plan and WPVA.
- 1.22 The WPVA demonstrates that viability will be necessary at application stage. The problem with this is that it is always the applicant reducing the affordable housing contribution which creates negative perceptions from the local community. Affordable housing is a policy priority for elected members, planning officers, the public and is an important component of an applicant's mixed and balanced proposal. Therefore, development plan policies should be set at a more deliverable threshold or be clearly worded to support and give weight to the viability tested route.
- 1.23 Increasingly, St William is faced with local plans that are aspirational but simply not deliverable; and a WPVA that is largely drafted to back solve an undeliverable affordable housing threshold.
- 1.24 This approach misleads elected councillors and members of the public that the threshold is deliverable. Industry as a whole has allowed this to happen by not properly engaging over recent years (except for the Berkeley Group), but given the economic issues now faced, and housing emergency, we must collectively react.