



Quod

R22 Local Plan

Matter 12: Green Spaces and Water Spaces - N13 East Ham

Newham Local Plan

St William Homes LLP

6TH NOVEMBER 2025

Q230126

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1 Introduction

- 1.1 On behalf of St William Homes LLP ('St William'), Quod submits this hearing statement in respect of Matter 12: Green Spaces and Water Spaces in response to IN3: Inspector's Matters, Issues and Questions; and Hearings Programme issued by the Inspector on 9th October 2025.
- 1.2 This continuing St William's engagement in the Regulation 18 (February 2023) and Regulation 19 (September 2024).
- 1.3 **This Hearing Statement should be read in conjunction with our submission to Matter 4: Neighbourhood Policies and Allocations – Hearing Statement (East Ham).**
- 1.4 **We reserve the right to amend this Statement until the Matter 12 deadline (27th November 2025).**

Q12.1

Is policy GWS1 justified and consistent with national policy and the London Plan? In particular:

a) Is the designation of each green space included on the policies map justified?

c) Are the areas of Metropolitan Open Land designated on the policies map consistent with the London Plan?

Introduction

- 1.5 GWS1 Part 1 is not sound¹ because it is inconsistent with the London Plan, unreasonably conflating Green Belt and MOL policy at part (b). Revised text is proposed at 1.11.2.
- 1.6 GWS1 Part 3 of this policy sets out where exceptional circumstances can be demonstrated for development on green space, however as currently draft it excludes MOL and Green Belt. In line with our previous comments, MOL and Green Belt should not be excluded and should be subject to the same tests in line with national planning policy which enables very special circumstances to be demonstrated for development within the Green Belt or MOL. Revised text is proposed at 1.11.3.
- 1.7 The R22 proposals map unreasonably designates nearly all of N13.SA3 (except the gasholder) as green space, even the land which it promotes development on. This is not justified. Revisions are proposed at **Appendix 1**.
- 1.8 In respect of N13.SA3 the areas of MOL designated on the policies map are not consistent with the London Plan, in particular MOL Area 21 (part of); and Area 22, 23 and 24. The evidence base² does not reasonably support the MOL designation; has inconsistently applied Criteria D of London Plan ('LP') Policy G3 to justify Criteria A compliance; has extended the MOL designation at N13.SA3 without justification; and there are exceptional circumstances which justify de-allocation of 1.74ha MOL (just 20% of the 8.5ha total), to effectively deliver N13.SA3 objectives.
- 1.9 This hearing statement is to be read alongside proposed amendments set out in our responses to Q1.9/10 (Viability) Q2.2/3 (Housing requirement); Q3.2 (Tall Buildings); Q4.15 (N13.SA3) in particular; M5 (Housing land supply); Q6.2 (AH) and Q6.3 (Housing Mix).
- 1.10 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. The R22 should apply the presumption at paragraph 11d) of the

¹ Framework paragraph 36

² **Appendix 2** EB068 and EB069 MOL review extracts

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

Framework at its core, and paragraph 125(c) should be embedded into the plan. It should include a review once the London Plan is adopted and to stimulate delivery.

GWS1: Green Spaces

1.11 GWS1 is inconsistent with the London Plan for the following reasons.

1.11.1 GWS1 Part 1 (b). *maintaining the open character of Metropolitan Open Land and Green Belt in accordance with the London Plan (2021) and national Green Belt policy* unreasonably conflates MOL policy with Green Belt Policy. Openness is a fundamental aim of Green Belt policy⁴ and an essential characteristic. This is not the same for MOL as the purposes of MOL at LP Policy G3 (B) (1-4) are different, and require at least criteria 1 and/or, 2 and/or 3 and 4 to be met. Openness is not the sole purposes, MOL is expected to offer a lot more.

1.11.2 GWS1 Part 1 should be revised to (b). *maintaining the open character of ~~Metropolitan Open Land and~~ Green Belt in accordance with ~~the London Plan (2021) and~~ national Green Belt policy and meeting the purposes for including land in MOL in accordance with the London Plan (2021).*

1.11.3 GWS1 Part 3 should be revised to 3. Developments on green space (~~excluding Metropolitan Open Land and Green Belt~~) will only be supported in exceptional circumstances *and very special circumstances for Metropolitan Open Land and Green Belt* for where:

1.12 MOL is not Green Belt land, does not serve the same purpose and is not subject to the same 'Golden Rules' set out in the Framework.

N13.SA3 East Ham Gas Works

1.13 London Plan Paragraph 8.3.1 expects MOL to provide more than open space to 'improve 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'. East Ham gasworks does not currently perform this role but could with the revisions we propose.

1.14 This reflects the Mayor of London's 'Towards a New London Plan' May 2025, which confirms that some areas of MOL 'are not accessible to the wider public and have limited biodiversity value. This undermines the purpose of the designation. These areas could be assessed to understand whether they should be released from MOL. They may be able to help to meet London's housing and accessible open space provision (for example opening up strategic new open spaces accessible to Londoners alongside new homes)'. (our emphasis).

⁴ Framework paragraph 142

- 1.15 The R22 Newham Local Plan⁵ ('R22') also recognises these limitations at Policy S5 'Beckton' (another St William gas site):

1.48 Partly as a consequence of the utilities works, and due to large sites awaiting development, the area contains large areas of open land that attract birds and other wildlife, meaning it has various Sites of Importance for Nature Conservation (SINCs), and Metropolitan Open Land designations. However, much of this has limited public access and use, with scope for this situation to be improved with additional green space and connectivity work being undertaken through the masterplanning of Strategic Sites and complementary enhancements of the Greenway (our emphasis)

- 1.16 These principles apply to East Ham.

East Ham Gas Works

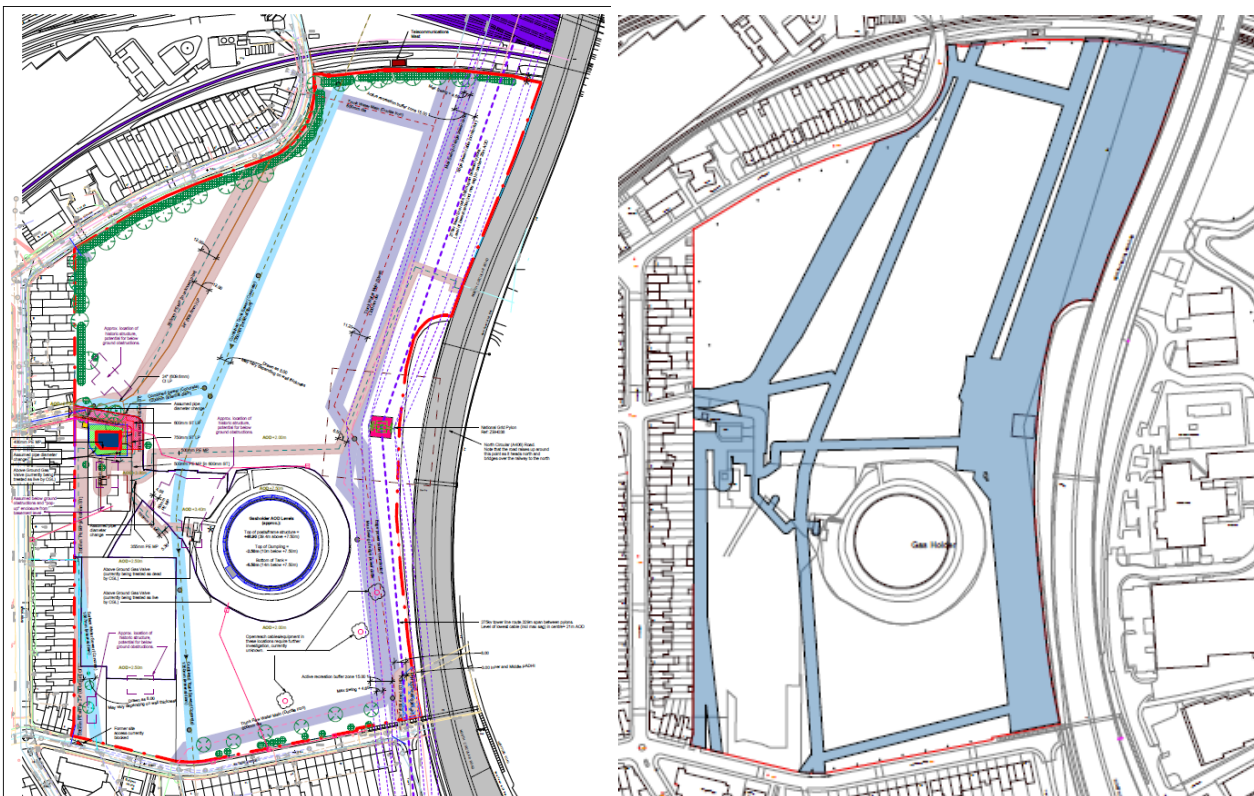
- 1.17 St William is freehold owners of the former gasworks. Built in 1880s the site still distributes gas via high pressure mains and contains operational equipment on site which dissects the site through a significant amount of infrastructure. The site contains a substantial gasholder of 15 storeys equivalent (46.9m AOD), an elevated concrete bund dumping, subterranean tanks (-4.5m below ground) and a pressure reduction system in addition to sewers, water mains, and gas mains - all utility infrastructure.
- 1.18 The Site is previously developed land ('PDL') as per the Framework definition due to its previous use, it is made ground and the utilities infrastructure extends out across the curtilage of the industrial former gas works site (see **Figure 1**). Other areas of the site, most notably the National Grid pylon along the eastern edge, comprises permanent and fixed surface infrastructure.
- 1.19 Despite mapping references to Leigh Road Sports Ground and others, these are legacy references that bear no relationship to any functioning publicly accessible open space, leisure use or landscape features.
- 1.20 Due to its previous use, initial site investigations have been undertaken and have identified that contamination is present and includes Aliphatic, Aromatic hydrocarbon bands, BTEX, Chrysotile cement, Cyanide, Heavy metals and Naphthalene⁶. The site is known to contain unexploded ordnance from WW2 ('UXOs'). The site constraints are shown at **Appendix 2**, the no build zones at **Appendix 3**, and UXO **Appendix 4**. These clearly poses a human health risk and need to be addressed prior to development.
- 1.21 The Environmental Protection Act 1990 Act and guidance states that to limit risk to human health, there cannot be exposure to such contaminants, and therefore access to the Site for the public and business employees is restricted to meet these legal and regulatory requirements.

⁵ SD005b Newham Submission Local Plan Tracked Changes

⁶ 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'.

- 1.22 Like all former gas sites including those in Newham with a SINC (Sites of Importance for Nature Conservation) designation, remediation of the site will result in the upper surface of the site being removed for remediation. This has the unfortunate, but necessary effect of removing the vegetation which justifies the SINC designation. We note that at East Ham Gasworks, the biodiversity value which informs the local SINC designation is limited and focused to the eastern boundary of the site. For this reason we do not believe it is sound designating the site as a new SINC, as this is incompatible with the Site Allocation N13.SA3.
- 1.23 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.
- 1.24 The Council's R22 evidence EB046⁷ Playing Pitch and Outdoor Sport Strategy refers to one disused cricket pitch on site. This private cricket pitch has been abandoned and there has been an absence of use approaching two decades. We have therefore suggested amendments to the site allocation.

Figure 1 - PDL site constraints and site no build zone



⁷ 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

- 1.25 For this reason, St Willian propose to extend the MOL deallocation proposed by the Council to Parcel 1 and Parcel 2.
- 1.26 Photos of the site are included at **Appendix 5**.

N13.SA3

- 1.27 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. However, matters remain unresolved.
- 1.28 The R22 policies do not recognise the PDL site as a contaminated former industrial site which contains substantial infrastructure and challenges to delivery. These matters need to be resolved first prior to St William effectively meeting R22 policies BFN1(e), BFN1(f), N13(11), N13(12), GSW1 and N13.SA3 which seek to open the site up to the public, a laudable MOL objective, and deliver housing and a new cricket pitch. Our Q4.15 (N13.SA3) hearing statement proposes amendments to address these matters.
- 1.29 Both parties agree that reorganisation of the MOL should be undertaken, we disagree with the extent for the reasons set out below.

N13.SA3 De-allocation / additional allocation

- 1.30 EB068 and EB069 categorise N13.SA3 as MOL Area 21 (8.25ha), Area 22 (0.15ha), Area 23 (0.11ha), and Area 24 (0.03ha). The derivation of this subdivision sets a precedent for further subdivision.
- 1.31 The Council propose to ‘de-allocate’ part of MOL Area 21 (0.10ha) and re-organise the MOL. We consider that the approach is inconsistent.
- 1.32 The difference between St Willam and the Council therefore is the robustness of the MOL designation overall; the boundary proposed for deallocation and allocation of MOL; the remaining MOL boundary; and the consistency of approach overall.
- 1.33 The areas of difference can be summarised as follows:-
- 1.33.1 The Council’s justification for part de-allocation of MOL Area 21 (0.1ha) can reasonably be applied more widely across N13.SA3.
 - 1.33.2 The Council’s proposed extension to the MOL designation isn’t justified (or actually tested) by the evidence base and seeks to extend the MOL designation across gasworks infrastructure.
 - 1.33.3 Two parcels of land are proposed for de-designation, Parcel 1 and Parcel 2.
 - 1.33.4 Parcel 1 includes all land in the isolated piecemeal areas comprising MOL Area 22, 23 & 24 to the southwest of the site where N13.SA3 and the Council’s Urban Design

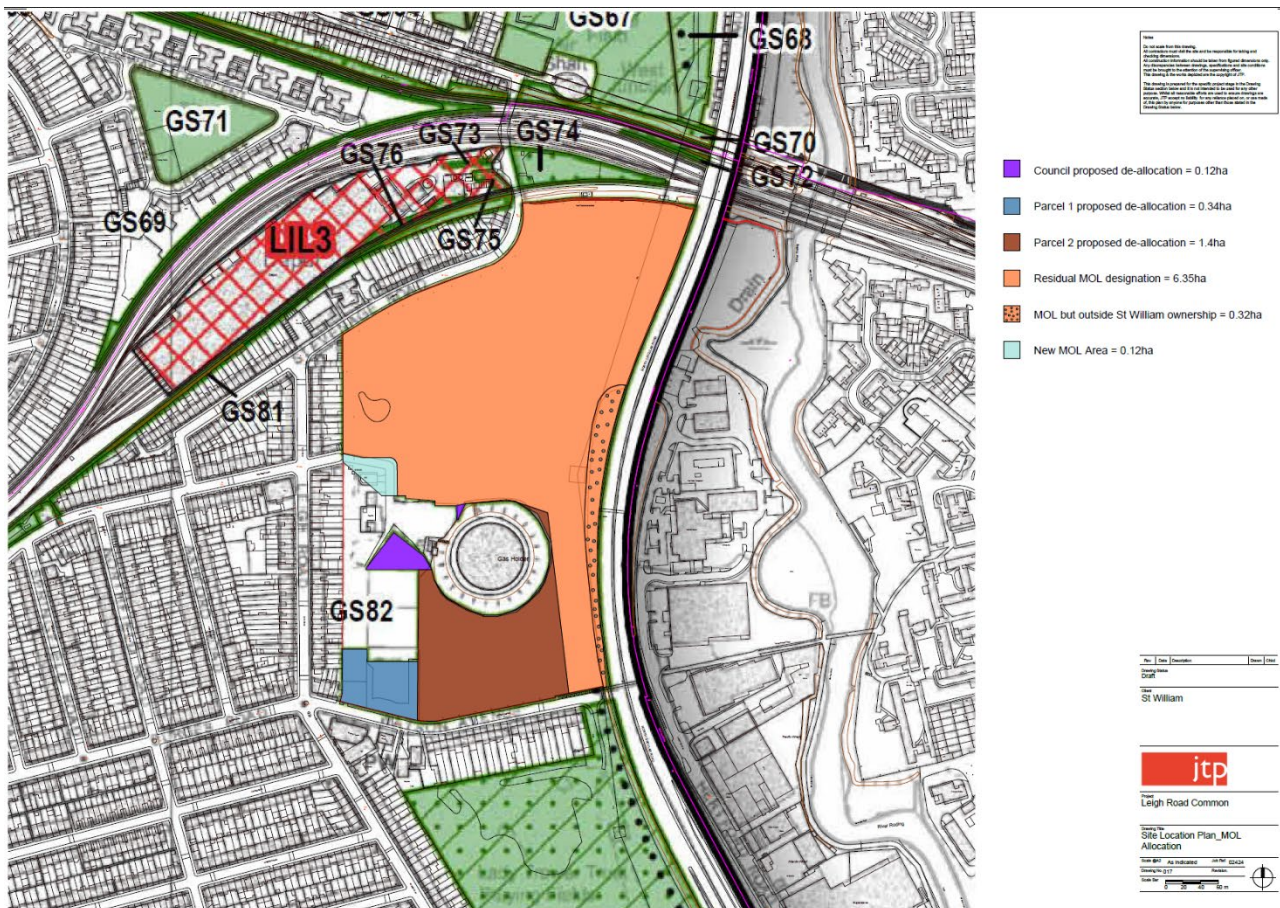
Framework⁸ propose a new vehicular access into the site, and the land does not meet the purposes of MOL designation. This area comprises 0.29ha.

1.33.5 Parcel 2 includes further land in MOL Area 21 to the south of the gasholder which is enclosed and constrained, and the land does not meet the purposes of MOL designation. This land also facilitates comprehensive development of the site and significant public benefits including opening up the whole site to the public, housing, and creating new leisure and sports facilities to the north of the site, on retained MOL, which can be used for the purposes of the designation. This area comprises 1.4ha.

1.33.6 The proposals would leave a residual MOL designation of 6.35ha, and more fundamentally, enable the MOL to serve the purposes of its designation.

1.34 The MOL de-designation by the Council and St William is summarised below at Figure 2 using the adopted proposals map as a baseline, and at **Appendix 6**.

Figure 2 - MOL de-designation and retention(adopted proposals map)

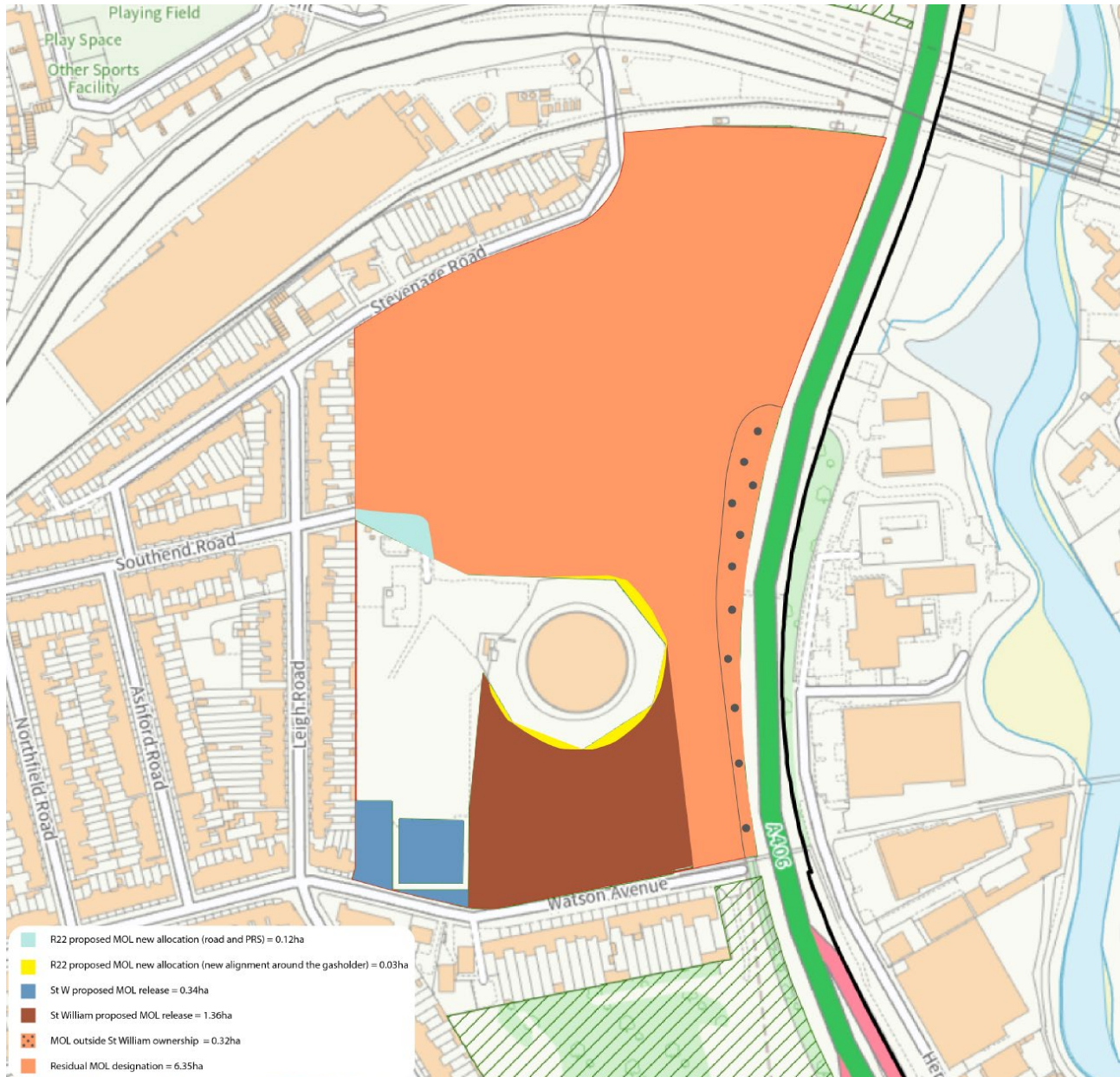


1.35 This assessment which would result in de-allocation of 1.85ha (22%) (R22 and St William proposal) to deliver N13.SA3 objectives and 6.67ha MOL retention.

⁸ Appendix x – ED003A R22 Urban Design Framework scheme extract

1.36 We have also annotated the Council's draft local plan at **Appendix 7**, which identifies new areas (light blue = 0.12ha and yellow = 0.03ha) that the Council propose to designate as MOL, unjustified because this is gasworks infrastructure and the MOL review evidence base EB068⁹ and EB069¹⁰ does not explicitly identify these areas and justify their inclusion against LP G3 policy criteria.

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



1.37 The justification for de-allocation of Parcel 1 and Parcel 2 is set out below.

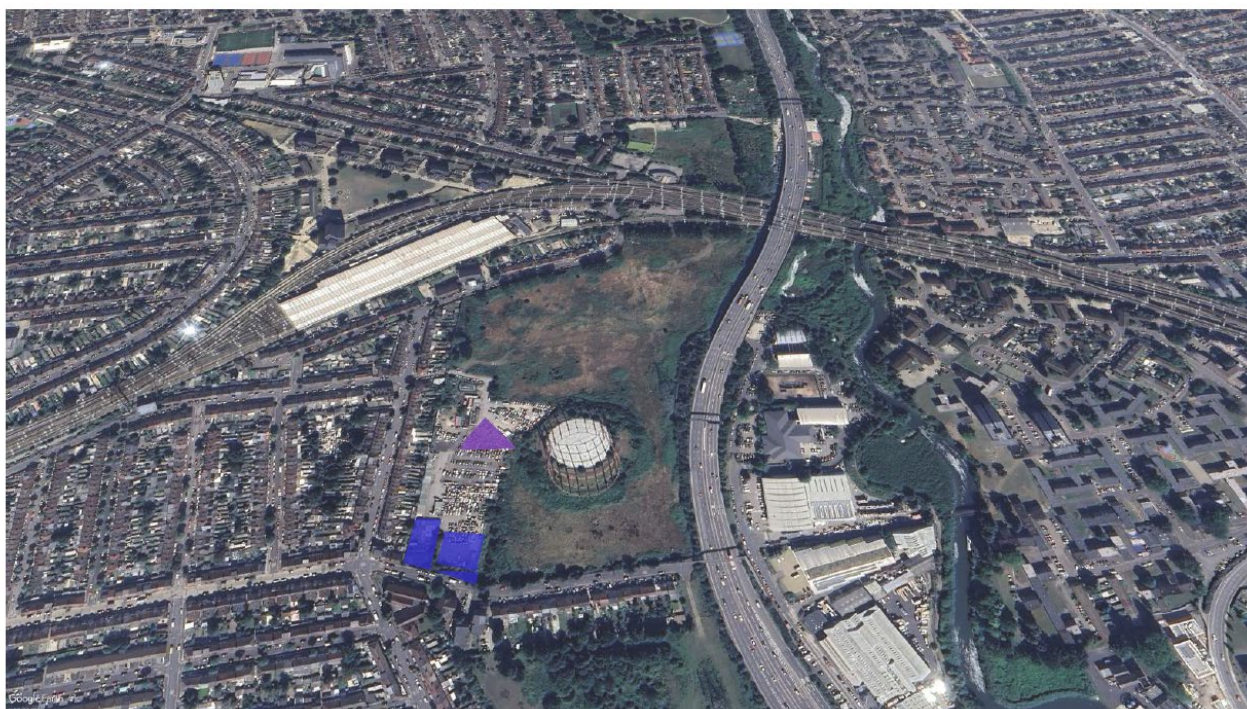
⁹ Newham Metropolitan Open Land Review (2025)

¹⁰ Newham Metropolitan Open Land Review (2025). Appendix A: Newham MOL Site Pro Forms

Parcel 1

- 1.38 Rationally, Parcel 1 should also be de-designated for the same reasons given by the Council for part of Area 21.
- 1.39 Parcel 1 contains hard standing; is used for car storage, suffers from localised erosion by development; the urbanising influence of the adjacent residential land uses to the southern boundary is significant; the site has limited to no visibility from the site boundary due to the brick boundary wall and dense perimeter tree vegetation which truncate views into the site, and there is no sense of openness. It is identified for new vehicular access in the R22.

Figure 4 - Parcel 1: Aerial Photograph & Council Area of de-designation



- MOL promoted for undesignation via Regulation 22 Local Plan
- Parcel 1 - MOL proposed for release by St William

- 1.40 Due to their size and location, the isolated parcels of MOL (Area 22, 22 and 23) do not individually or cumulatively meet London Plan Policy G3 (MOL) Criteria A. They do not contribute to the physical structure of London by being clearly distinguishable from the built-up area, indeed they largely comprise part of the built-up area. The Council agree that Parcel 1 does not meet Criteria B and C. It doesn't. Parcel 1 does not therefore perform an MOL function.
- 1.41 The Council's R22 Local Plan Policies Map (see Figure 5) in any event appears to part de-allocate MOL from this southwestern corner (see walkway carved out of former bowling green); and the Council's own Urban Design Framework capacity assessment¹¹ and indicative scheme propose a new vehicular access through this area, as shown in Figure 6.

¹¹ Appendix 9: N13.SA3 ED003a

Figure 5 – Extract of R22 Policies Map showing Parcel 1

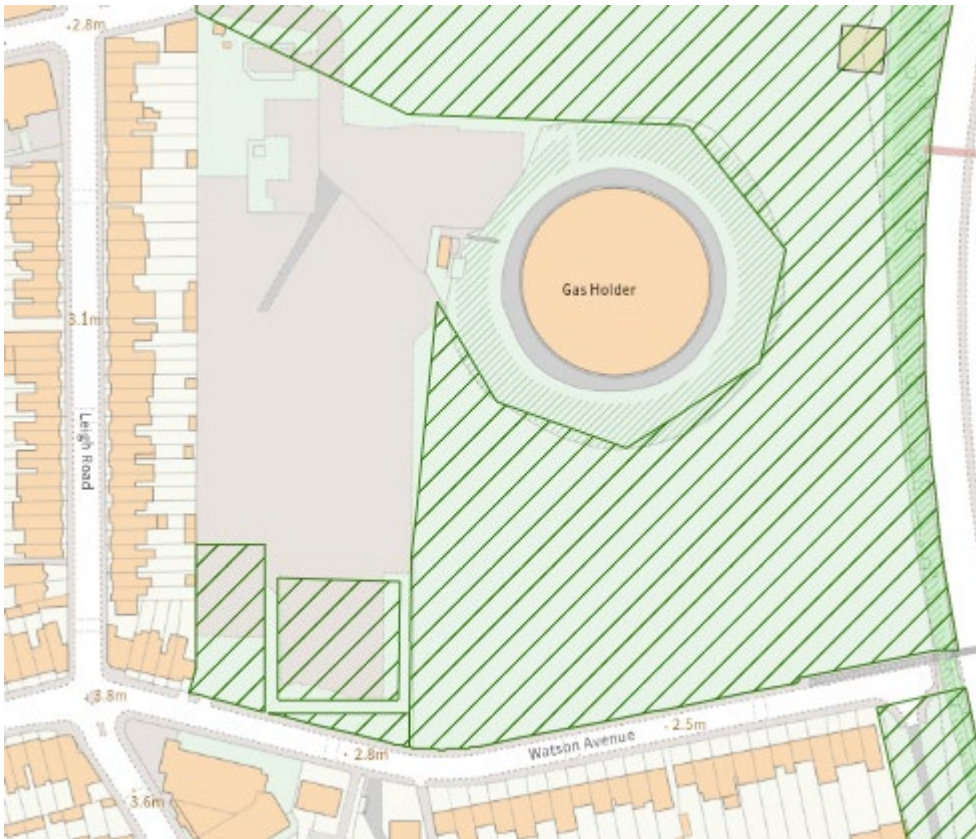
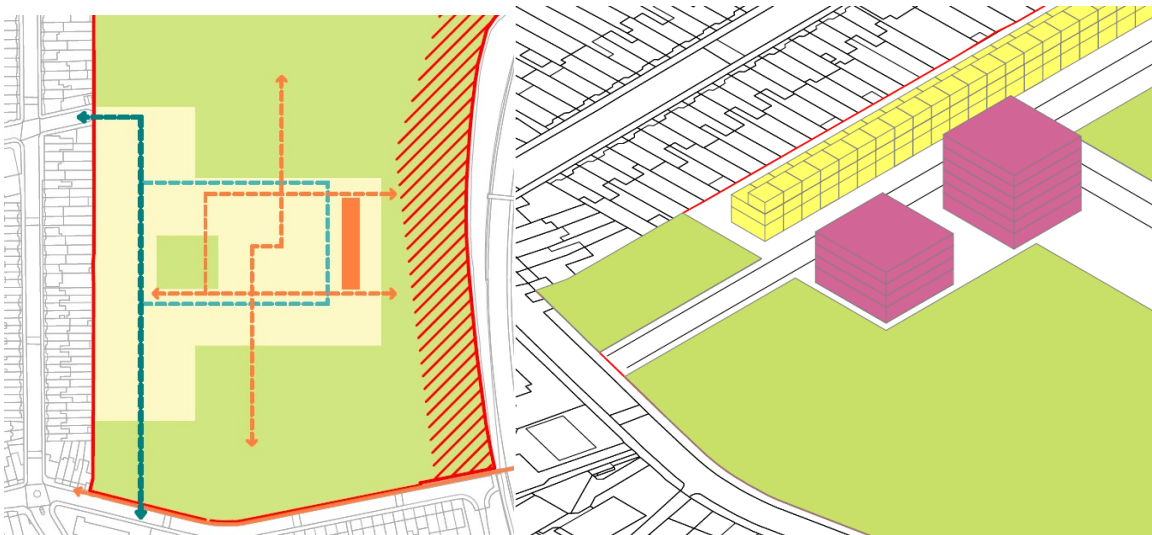


Figure 6 - ED003A R22 extract



1.42 Our proposed re-organisation of the MOL in this south western corner will form a more coherent parcel of MOL overall within N13.SA3.

Parcel 2

- 1.43 The R22 review can reasonably conclude that Parcel 2 does not meet the tests for MOL designation and there are exceptional circumstances that support de-allocation of this small area of MOL.
- 1.44 The Council's review of MOL Area 21 concludes that the designation is one of the poorest performing in the borough, the site is inaccessible, does not meet Policy G3 Criteria B (leisure) and C (ecology quality), and achieves Criteria A by just one point, and even then, offers only a 'moderate' contribution to the physical structure of London.
- 1.45 If the site scored 2 rather than 3, the site would not overall meet the criteria for MOL and it would not be designated as MOL. This is a marginal assessment by any reasonable consideration, but it results in a significant policy constraint of national significance, potentially delaying regeneration and the delivery of homes.
- 1.46 As explained in detail in Section 2 of this hearing statement, the Council's MOL assessment (EB068 and EB069) fails to consider the significant gasometer structure in the middle of the site in its Criteria A assessment. This structure creates a pinch point at the south and eastern boundary of the site, an artificial relationship, and visually encloses Parcel 1 and 2 with urban development. EB069 recognises that there is localised erosion by development and the urbanising influence of the adjacent residential land uses and the boundaries reflect areas of hardstanding *'As a result, the site includes isolated parcels of MOL which do not reflect Criteria A.'*
- 1.47 The assessment also conflates LP G3 Criteria D 'green links' into Criteria A artificially boosting the scoring to 3, overlapping two issues to justify Criteria A compliance. The site's designation in the All-London Grid relates to Criteria D, not A, and does not support MOL designation under Criteria A overstating its score as this relates to a plan designation not to physical structure.
- 1.48 The site is inaccessible and does not meet the MOL designation now, but the northern part could (6.35ha), post de-designation and development, and exceptional circumstances that we discuss in Section 3.

2 Application of MOL Criteria

- 2.1 This chapter considers the robustness of the Council's evidence base, and our assessment to justify de-allocation in light of LP Policy G3, the principal MOL policy which permits boundary changes in exceptional circumstances. It is well established in the courts that "*exceptional circumstances*" to release MOL is a lower threshold than is required for inappropriate development in MOL (i.e. the very special circumstances test).¹²
- 2.2 St William's previous representations made clear that there would be no policy basis for the designation of this land as MOL, were the decision to be taken now.¹³

Newham Metropolitan Open Land Review (2025)

- 2.3 The context for the MOL assessment is set out at paragraph 1.4/1.5 which confirms that the borough's overall provision of '*publicly accessible*' green space in Newham is low, with a rate of just 0.72 hectares per 1,000 residents. We agree that '*publicly accessible*' green space is a key metric of MOL purpose.
- 2.4 Paragraph 1.7 states that the starting assumption for the review is that the adopted MOL parcels in Newham are broadly correct. We disagree. However, EB068 acknowledges that Newham's green space mapping was last comprehensively reviewed more than a decade ago. Therefore, the Council, as part of its supporting evidence for the emerging Local Plan, has reviewed the Borough's green space designations more broadly, through the development of its Green and Water Infrastructure Strategy (2024) (EB061-EB07). The assessment is therefore only strategic, and therefore as a result, there are flaws.
- 2.5 The assessment recognises at N13 East Ham (page 161) at paragraph 7.144 that '*The green spaces on the eastern boundary of the neighbourhood are Metropolitan Open Land but are not currently publicly accessible.*'
- 2.6 This partly informs the Site Allocation requirements of N13.SA3 (East Ham Former Gasworks) at paragraph 7.148 – 7.149 proposing to address deficient access to local parks by retaining as green space the area allocated as MOL and making it publicly accessible providing play provision and the provision of community growing opportunities. We support this, but the policy, as drafted is not deliverable because it omits consideration of the site constraints that prohibit public access and leisure.
- 2.7 EB068 sets out the findings of the MOL review at Table 3: Area assessment summary using the London Plan Policy G3 criteria (enclosed as **Appendix 8** and replicated below at Figure 6).
- 2.8 The Council's assessment uses the following scoring for each criteria:-

¹² [Compton Parish Council & Ors v Guildford Borough Council & Anor \[2019\] EWHC 3242 \(Admin\) \(04 December 2019\)](#)

¹³ St William's Regulation 18 Representations Paragraph 16.7.

- Level 1-2 (weak and weak-moderate) – this is a failure to achieve MOL
- Level 3 (moderate compliance),
- Level 4 (moderate-strong), and
- Level 5 (strong).

2.9 By the Council's own admission, as shown at Figure 6, the four East Ham MOL Areas perform poorly against Criterion B (open air and leisure) which is not disputed, and Criterion C (landscapes of national or metropolitan value) because the SINC is of lower quality borough status.

Figure 6 - Newham Metropolitan Open Land Review (2025), R22 EB068 Table 3 extract A21-A24.

	Criteria A	Criteria B	Criteria C	Criteria D	Conclusion								
MOL Area	a. it contributes to the physical structure of London by being clearly distinguishable from the built-up area	b. it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London	c. it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value	d. it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.	<table><tr><td></td><td>Parcel should be retained as MOL.</td></tr><tr><td></td><td>Parcel should be designated as new MOL.</td></tr><tr><td></td><td>Parcel retained as MOL with proposed boundary amendments.</td></tr><tr><td></td><td>Parcel should be omitted from MOL.</td></tr></table>		Parcel should be retained as MOL.		Parcel should be designated as new MOL.		Parcel retained as MOL with proposed boundary amendments.		Parcel should be omitted from MOL.
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	Parcel retained as MOL with proposed boundary amendments.												
	Parcel should be omitted from MOL.												
A20: Langdon Academy	3	3	2	5	Parcel retained as MOL with proposed boundary amendments.								
A21: East Ham Sports Ground	3	2	2	5	Parcel retained as MOL with proposed boundary amendments.								
A22:East Ham Sports Ground 2	3	1	2	5	Parcel should be retained as MOL.								
A23: East Ham Sports Ground 3	3	1	2	5	Parcel should be retained as MOL.								
A24: East Ham Sports Ground 4	3	1	2	5	Parcel should be retained as MOL.								

2.10 Criteria A is therefore the primary contributor to the designation of MOL at East Ham Gas Works.

G3B(1): it contributes to the physical structure of London by being clearly distinguishable from the built-up area

2.11 The evidence base scores each individual part of the Site as Level 3 (moderate), namely that *'built development is generally absent across much of the area. And/or: Sense of openness is mostly well-defined with only localised erosion by development and urbanising influences. Contribution to physical structure of London is apparent, although likely to be fragmented rather than intact. And/or: Reasonable level of topographic variation contributing to definition*

of edge conditions, or fair landscape structure (which may have enhancement potential).' Level 3 is the pass threshold for overall MOL compliance in this case.

- 2.12 We disagree with the assessment and believe that the score should be Level 2 (weak-moderate), namely that *'built development is notable in parts of the parcel. And/or: Sense of openness is relatively weakly defined with a clearly apparent sense of erosion by development and urbanising influences. Contributes to physical structure at a very local (neighbourhood) scale And/or: Fairly low level of topographic variation contributing to definition of edge conditions, or partly fragmented landscape structure (likely to great have enhancement potential)'*.
- 2.13 Many elements of Level 1 (weak) are also relevant, certainly with regards to A22, A23, A24 which are isolated designations tightly surrounded by urban form, and are hardstanding.
- 2.14 For the main MOL designation (A21), Criterion A level 3 is justified on the following grounds.

The sense of openness is well-defined but there is localised erosion by development and the urbanising influence of the adjacent residential land uses to the south, west and part of the northern boundary where the perimeter tree cover is less dense. It's location on the All London Green Grid (2012) GGA2 Epping Forest and Roding Valley strategic corridor means it contributes to the physical structure of London. However, boundaries along the eastern¹⁴ edge of the parcel reflect areas of hardstanding to the south and west of the gas holder. As a result, the site includes isolated parcels of MOL which do not reflect Criteria A.

- 2.15 For this reason, the de-allocation of the triangle of land identified at Figures 2 and 4 is proposed for de-designation.

Whilst the overall parcel meets Criteria A, for the reasons set out above, it is proposed that the boundary is amended as illustrated to better fulfil the function of this criteria. The re-organisation of the MOL will form a more coherent parcel of MOL while protecting the core function of the site as a key structural feature in the Epping Forest and Roding strategic corridor.

- 2.16 However, and overall, we do not consider this a robust justification for MOL designation of Parcel 2.
- 2.17 The evidence recognises local erosion, urban influence, hardstanding and isolated parcels. Fundamentally reference to the visual significance of the 46m AOD (equivalent to 15 storeys) gasometer in the middle of the site, the c.50m National Grid electricity pylon and the part elevated A406 is omitted as is the railway lines, East Ham Depot and tower blocks beyond along the north east boundary. Whilst the northern side of Watson Avenue is free from development, views into the Site from the south western end are screened by the existing brick wall with the remainder benefiting from only glimpsed views into the Site through a heavily landscaped boundary or via the elevated footbridge over the North Circular (A406) to Barking.

¹⁴ Should read western edge

But this view is dominated by the urban form on site of the gasometer, electricity pylon, and the point blocks of Hathaway Crescent beyond.

- 2.18 For Parcel 1 and 2, there are no visual linkages to functional character and wider MOL, and as the site is not publicly accessible, there are no opportunities for views outwards from within the Site. We do not consider therefore that there is a well-defined sense of 'openness' at category level 3. The site is in poor condition, is degraded and is one that in townscape terms is not a valued townscape (NPPF para 187a). Elements of the site directly influenced by the immediately adjacent built form, are of low townscape value.
- 2.19 Even if it is agreed that the site does perform / benefit from a degree of 'open character' it is not qualitatively better than other green space that is not designated as MOL, and it is not apparent what benefit an inaccessible designation has for Londoners, bearing in mind other needs. In any event, openness is a limited perceptual facet of the designations. This is apparent from elements of MOL being a small 12m width.
- 2.20 Who benefits from this visual openness? It is pedestrians walking the perimeter who obtain glimpsed views inside an enclosed industrial gasworks site surrounded and informed by infrastructure?
- 2.21 Openness is one of the fundamental components of Green Belt policy¹⁵ in preventing urban sprawl, but the primary thrust of GWS1 relates to creating functionality, connectivity, quality, and accessibility of existing open green space to be used by residents of the borough, not as a spatial planning tool to prevent unrestricted urban sprawl and neighbouring towns from merging. East Ham and Barking are already part of the urban sprawl of London.
- 2.22 We also remain concerned that the scoring for Criteria A has been informed by the designation of the green link (Criterion D), and therefore double counting has taken place.
- G3B(4): it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.
- 2.23 The Council score the Site as Level 5 (strong), namely that '*Parcel contains or forms part of a park of Metropolitan importance or contains part of a green link of London-wide importance, such as a Green Chain. Likely also to contain an extensive or well-connected green link network.*'
- 2.24 This criterion is relevant only where another criterion is met, in this instance, against the Council criterion 1.
- 2.25 We recognise that the site is located within the All-London Green Grid (2012) GGA2 Epping Forest and Roding (River) Valley strategic corridor which follows the Roding River, and M11 and A406 from the north to the Royal Albert Dock and River Thames to the south.
- 2.26 Crucially, however, the River Roding is located on the opposite side of the Site separated by the elevated, six lane North Circular (A406) which runs between the Redbridge roundabout to

¹⁵ Framework Chapter 13, Para 142

the north and the Beckton roundabout to the south. No public access from the River Roding to the Site beneath the A406 is currently available.

- 2.27 A pertinent description within the All-London Green Grid '5.27 *To the south of Woodford, the Roding Valley is dominated by road and utilities infrastructure and contains areas of both degraded open space and sites of surprising ecological value. Amenity grassland is the dominant land cover and there is relatively little tree cover. The Roding has largely been straightened and in many cases is no more than a concrete channel*'.
- 2.28 To the north of the Site lies two elevated railway lines, which aside for the pedestrian and cycle underpasses, presents physical barriers when travelling north to south.
- 2.29 The extent of the corridor, node or link is therefore significantly diluted by the following:-
- Major railway infrastructure to the north;
 - Major roadway infrastructure to east;
 - Watson Avenue and housing to the south;
- 2.30 In any event, any future development of the Site would retain and enhance the green link along the eastern boundary, to account for the no-build zone beneath National Grid's electricity cables.

G3B(2) & G3B(3)

- 2.31 The Council score the Site as Level 2 (weak-moderate) for G3B(2). This is incorrect, as the site contains no open-air sport, recreational or cultural facilities of any importance/catchment. The site should therefore be rated as Level 1 (weak).
- 2.32 The Council score the Site as Level 2 (weak-moderate) for G3B(2), because the site has Weak-Moderate biodiversity value. The majority of the parcel is a proposed Site of Importance for Nature Conservation (SINC) of Borough status (SINC: NeB29, Former Leigh Road Sports Ground), a '*local graded*' SINC.
- 2.33 EB070 Review of Site of Importance for Nature Conservation (April 2025) identifies the new SINC designation for the Site at Table 7 Neb28 (new boundary aligned with MOL) due to '*An extensive area of rough grassland, scrub and ruderal habitat surrounding the former East Ham gasholder. Already designated as protected green space GS82*'. The assessment was last updated in 2022 and is not particularly enthusiastic.

Conclusions

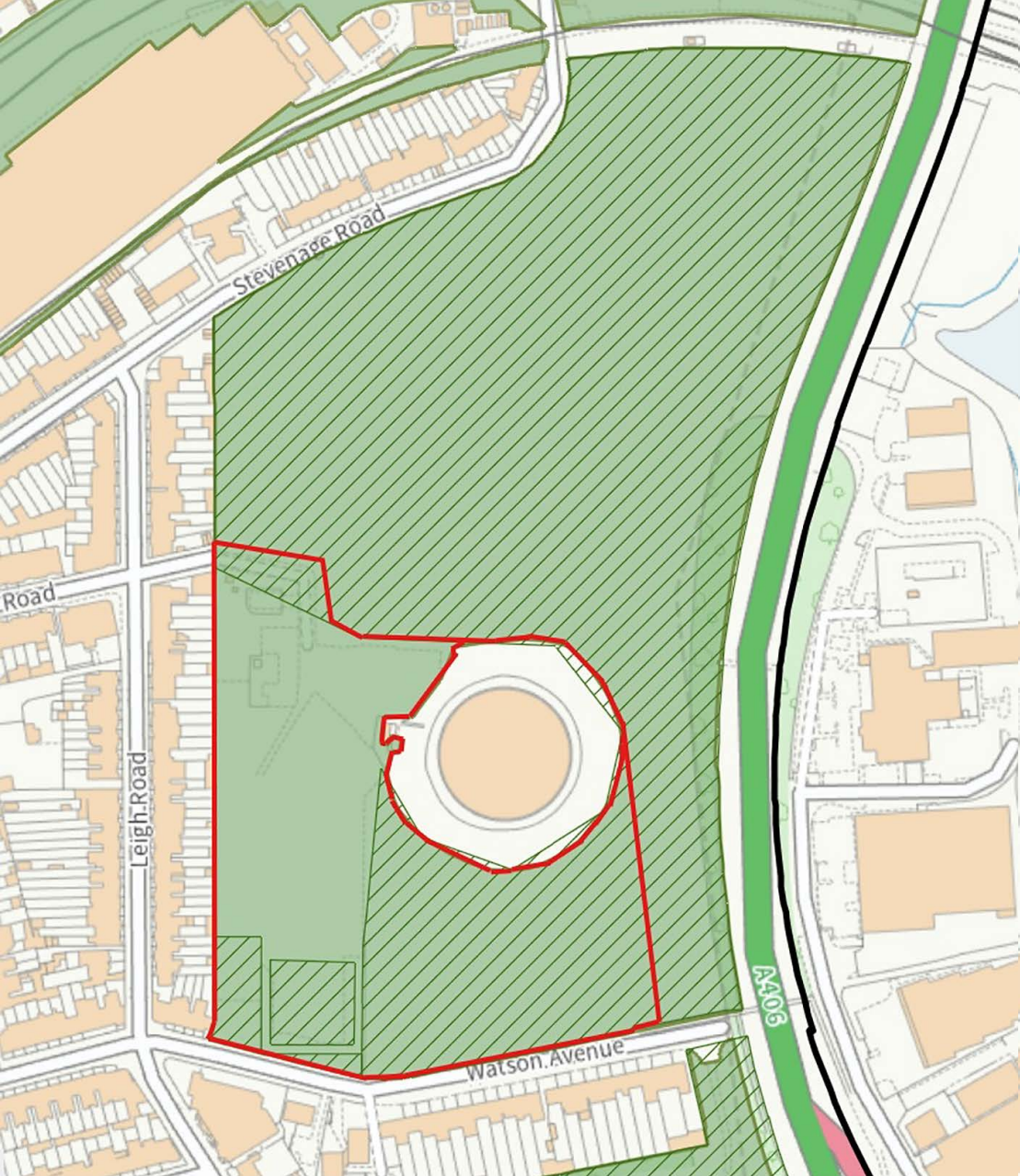
- 2.34 On any reasonable assessment of the MOL criteria, the designation is marginal.
- 2.35 The Council's own assessment scores the site as one of the lowest 39 MOL sites in the borough, just scraping through. The Council's assessment points to a designation based on 'openness' only tied to a green link. This is poorly justified.
- 2.36 On our assessment the score reduces further, and would trigger a failure against Criteria 1, and therefore MOL de-designation.

2.37 As we set out in the following section, there are in any event exceptional circumstances that warrant de designation which we discuss in the next section.

3 Exceptional Circumstances

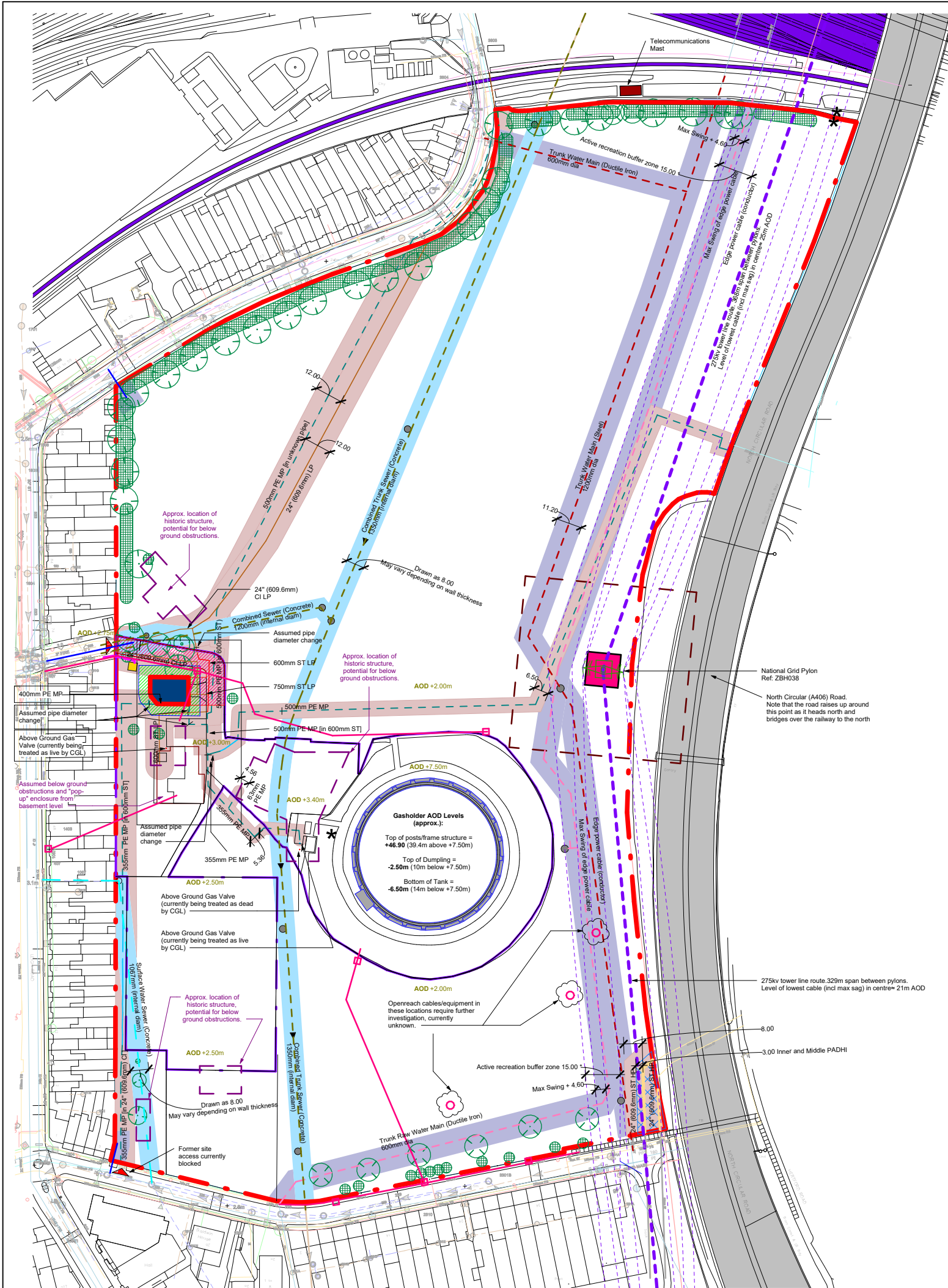
- 3.1 We consider that there are individually and cumulatively exceptional circumstances that weigh in favour of Parcel 1 and Parcel 2 MOL de-designation for the following reasons.
- 3.1.1 The site is PDL.
 - 3.1.2 The site contains extensive areas of hard standing.
 - 3.1.3 The site is contaminated and contains contaminated made ground.
 - 3.1.4 There is no public access to the site due health and safety considerations. There is UXO on site.
 - 3.1.5 The Council's evidence scores the site poorly against LP G3 MOL criteria A, and it is agreed that the site does not meet criteria B or C.
 - 3.1.6 There is significant unmet housing need in the borough, a failure of the HDT, and a lack of deliverable and available housing sites. The site could deliver 600 homes for only a small area of deallocation and significant public benefit.
 - 3.1.7 Social, economic and environmental benefits of development would occur including site remediation and site repair; housing; sports and community facilities including a cricket pitch; and new publicly accessible open space; new biodiverse rich landscaping and permeability across the site compliant with development plan policies.
- 3.2 There is also a genuine 'do-nothing' scenario, leaving the site closed off to the public with contamination in place and unexploded ordnance. This is land that the Council and public cannot use as MOL.

Appendix 1 - Proposed revisions to R22 GWS1 Proposals Map



Land shown within red line proposed for release from GWS1 Open Space designation

Appendix 2 - 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
- 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]

- 500mm PE MP (north): (12m) [6.5m]
- 24" (610mm) CI LP (north): (12m) [6.61m]
- 500mm PE LP (west): 12m [3.5m]
- 24" (610mm) CI LP (west): (12m) [6.61m]
- 355mm PE MP (south west): (12m) [5.355m]
- 610mm ST HP (south east): (16m) [18.3m]
- 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]

- 355mm PE MP (central): (N/A) [5.355m]
- 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.

* Active Recreation buffer zone - This is a 15m buffer zone for 'unsupervised' access recreation buffer zone. Refer to page 19 of ref 2 for further information.

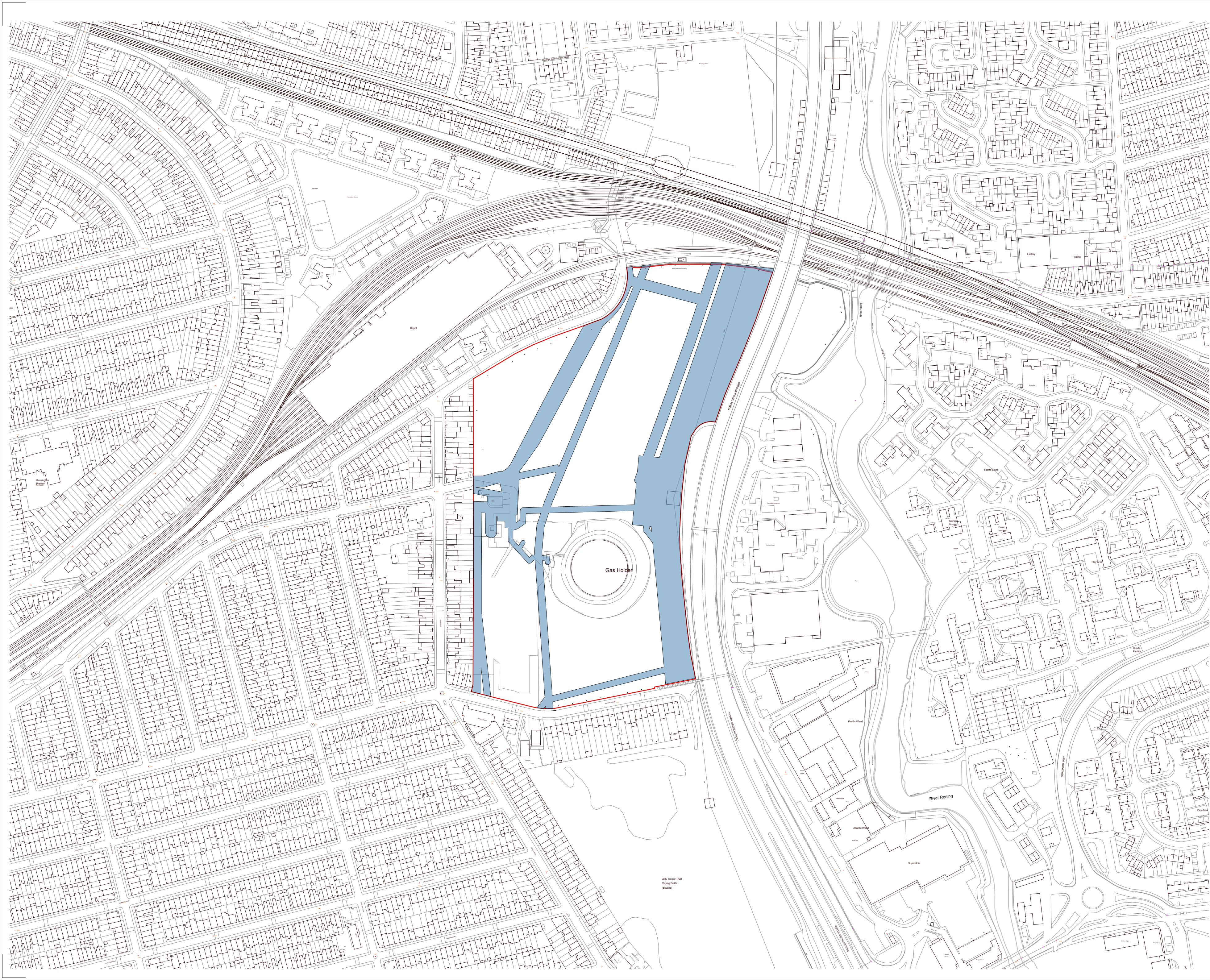
Standard Easement Widths		
Pressure tier / Material	Diameter	Easement Width (total)
HP Steel	900mm, 1060mm, 1200mm (36", 42" & 48")	24.4m (80')
HP Steel	750mm and 600mm (30" & 24")	18.3m (60')
HP Steel	Up to and including 450mm (18")	12.2m (40')
HP RTP	Determined on a case by case scenario	
IP Steel	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	
 Designed for life		Date	Scale (@ A3)
		29/10/25	1 : 2000
		Drawn by DB	DRAWING NUMBER
Checked by RF		0003	REV 1

LOCATIONS OF SERVICES INDICATIVE DO NOT SCALE FROM THIS DRAWING

Appendix 3 – Plan showing No Build Zone



Notes

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Rev	Date	Description	Drawn	Chkd
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Drawing Status
Draft

Client
St William



Project
Leigh Road Common

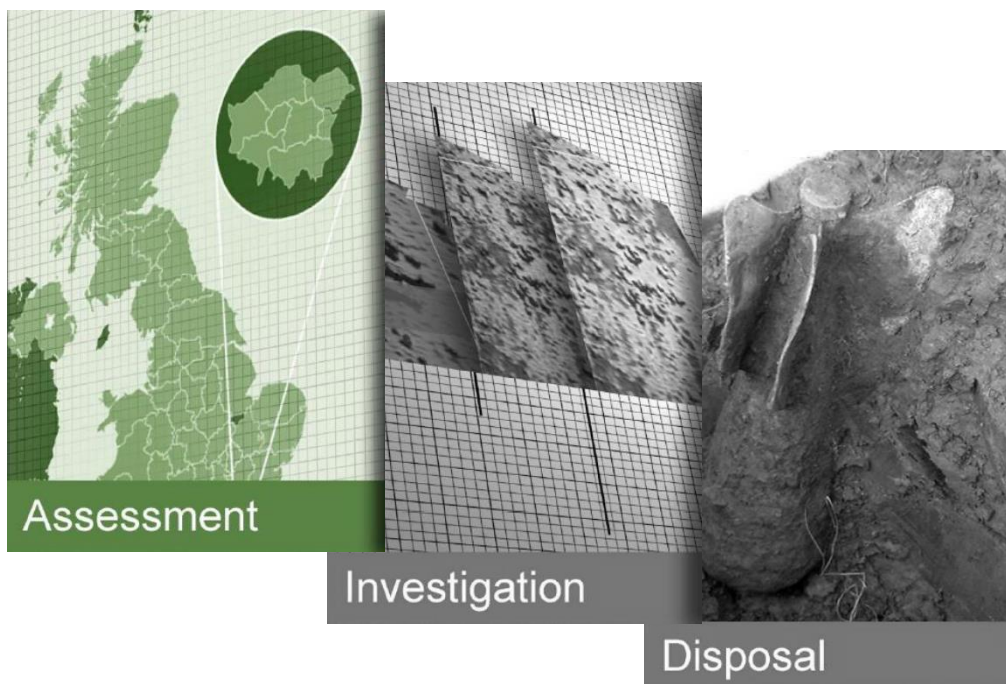
Drawing Title
Site Location Plan

Scale @A2 1 : 2500 Job Ref. 02424

Drawing No. 012 Revision.

Scale Bar 0 20 40 60 m

Appendix 4 - UXO Survey



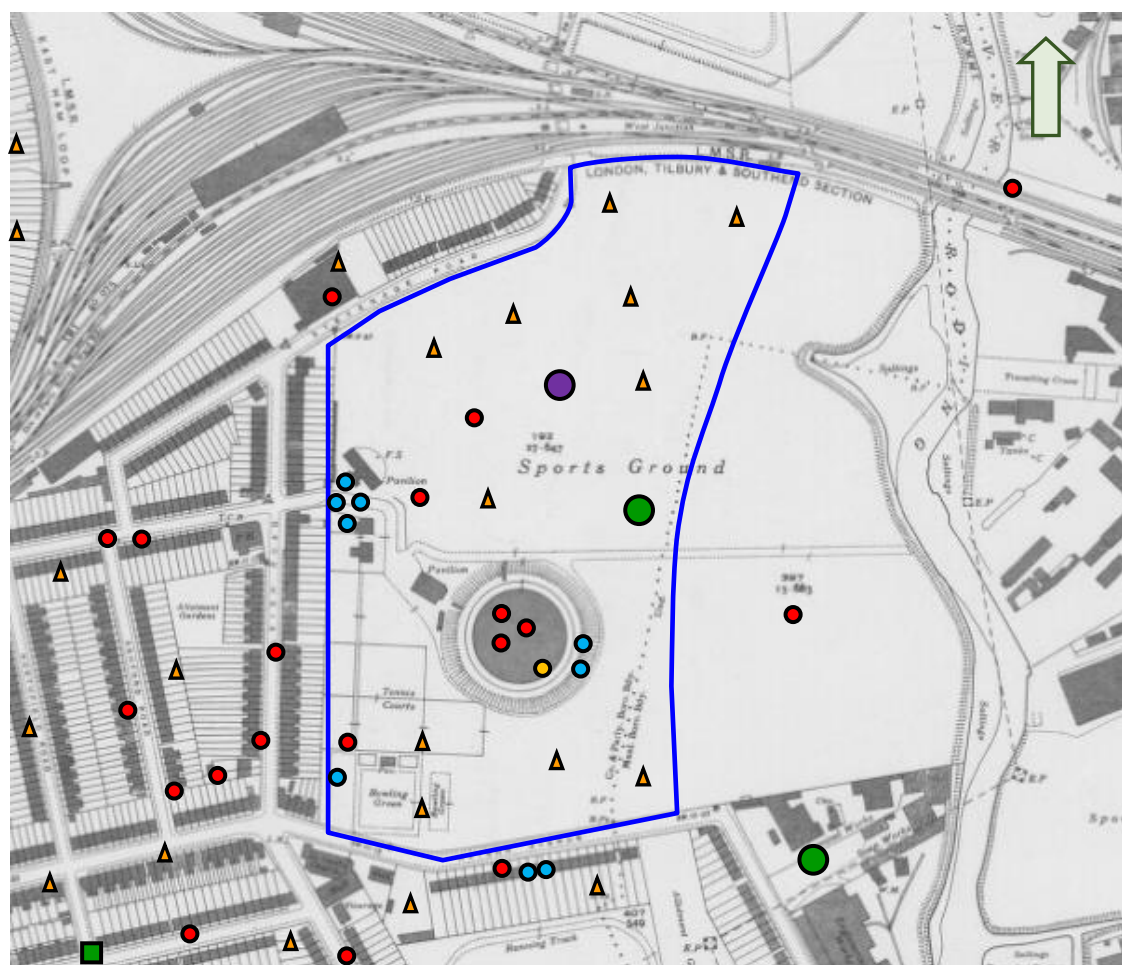
Southend Road, East Ham – UXO Desk Study & Risk Assessment

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 5 - Site Photos

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.



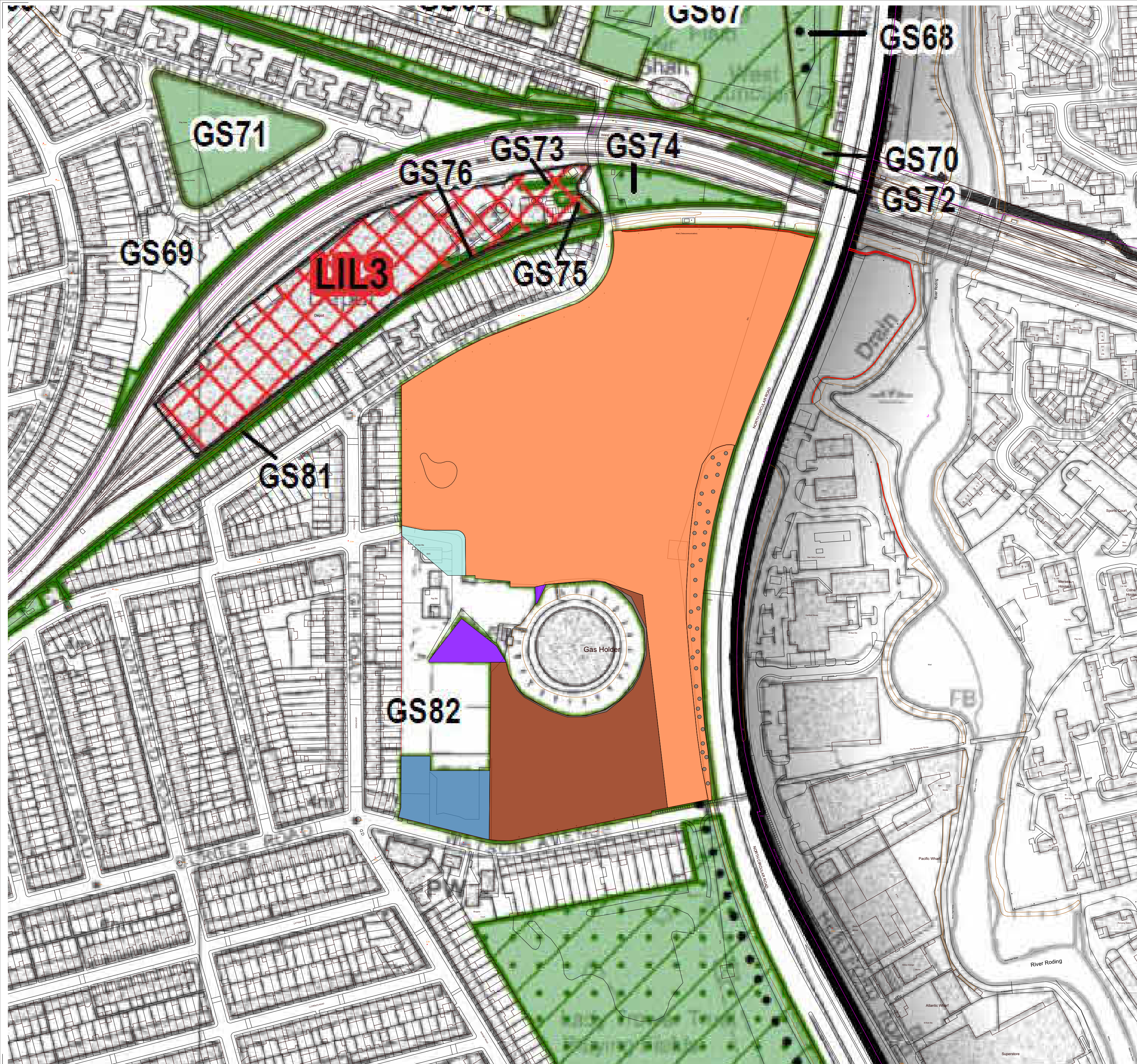
Figure 7 - Photograph taken from elevated southbound North Circular (east of the site) with electricity pylon and gasholder visible.



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



Appendix 6 - Adopted Policies Map MOL allocation with areas



Notes

Do not scale from this drawing.







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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
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Drawing Status
Draft

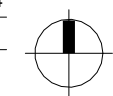
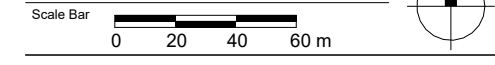
Client
St William



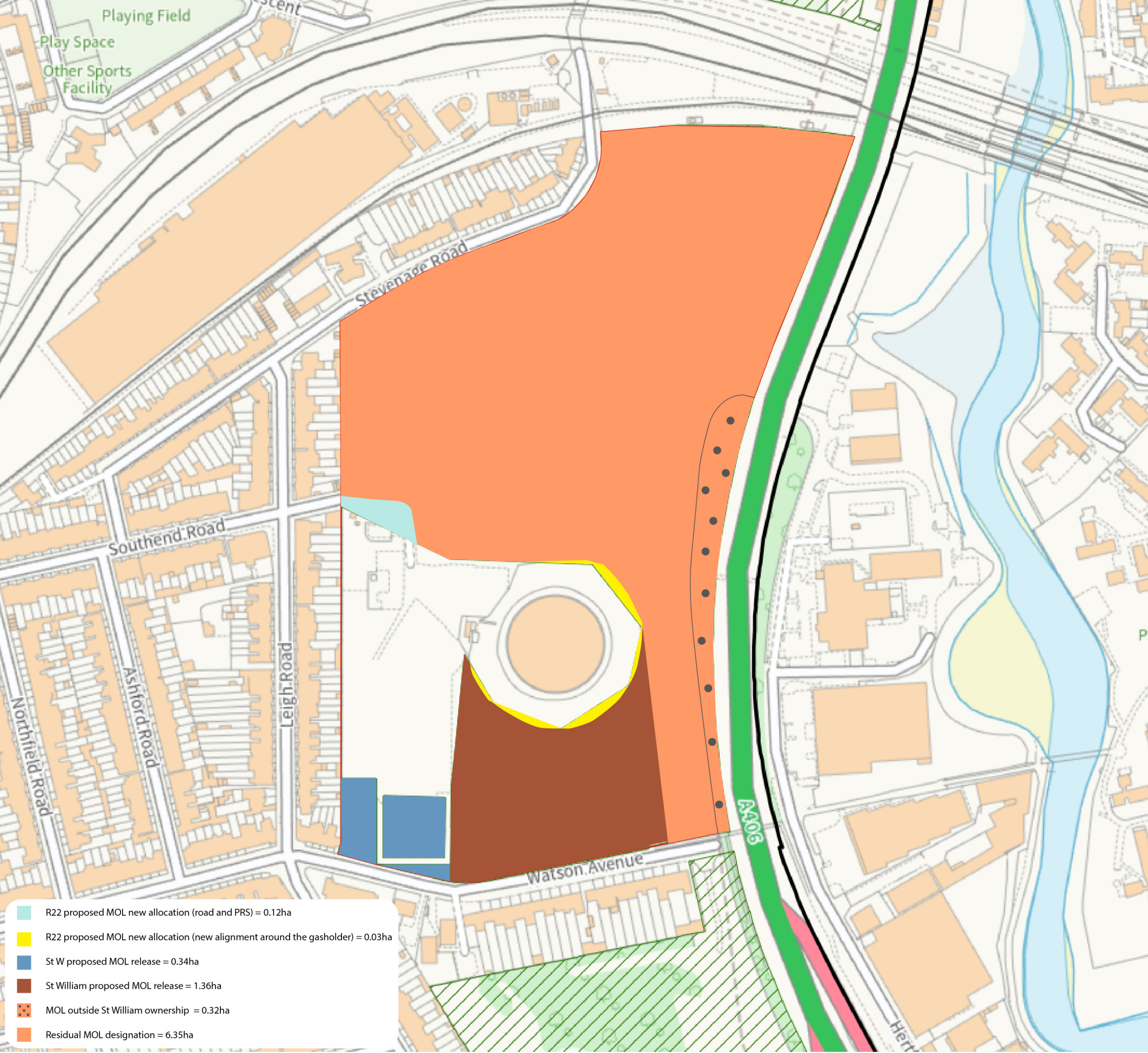
Project
Leigh Road Common

Drawing Title
Site Location Plan_MOL Allocation

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



Appendix 7 - R22 Policies Map MOL allocation with areas



- R22 proposed MOL new allocation (road and PRS) = 0.12ha
- R22 proposed MOL new allocation (new alignment around the gasholder) = 0.03ha
- St W proposed MOL release = 0.34ha
- St William proposed MOL release = 1.36ha
- MOL outside St William ownership = 0.32ha
- Residual MOL designation = 6.35ha

Appendix 8 - EB068 & EB069 MOL Extract

Newham Metropolitan Open Land Review (2025)

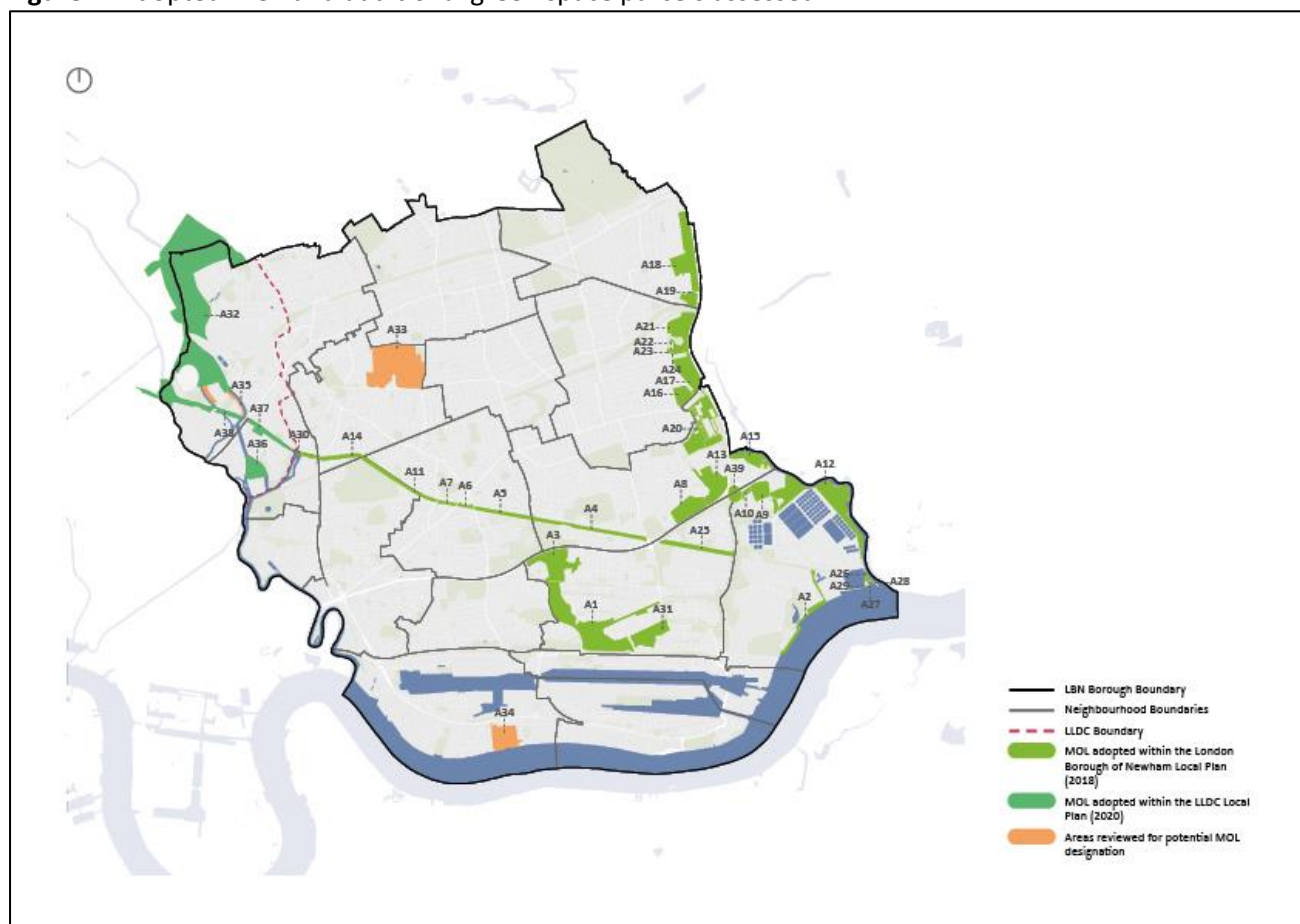
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Local Policy	8
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5: Conclusion and recommendations	20
Glossary of Terms and Acronyms	23

Table 1: MOL designated in Newham's adopted 2018 Local Plan /LLDC's Local Plan 2020

MOL Area	Neighbourhood	Size (Ha)	Local Plan
A1: Beckton District Park South	N11 Beckton	23.44	LBN
A2: Roding Valley Way-part	N17 Gallions Reach	3.18	LBN
A3: Beckton District Park North	N11 Beckton	10.56	LBN
A4: The Greenway 7	N12 East Ham South	4.39	LBN
A5: The Greenway 6	N10 Plaistow	2.35	LBN
A6: The Greenway 5	N10 Plaistow	0.53	LBN
A7: The Greenway 4	N10 Plaistow	0.64	LBN
A8: Gooseley Playing Fields	N12 East Ham South	6.81	LBN
A9: Alfreds Way Open Space-partly & Norwegian Playing Fields	N17 Gallions Reach	3.55	LBN
A10: Alfreds Way Open Space - part	N17 Gallions Reach	0.53	LBN
A11: The Greenway 3	N10 Plaistow	1.59	LBN
A12: Roding Valley Way-part & Northern Lagoon, Beckton Sewage Works	N17 Gallions Reach	17.77	LBN
A13: Folkestone Road Allotments & Gardens and partly Waterway	N12 East Ham South	7.96	LBN
A14: The Greenway 2	N9 West Ham	4.33	LBN
A15: Cuckold's Haven	N12 East Ham South	4.10	LBN
A16: Barking Road Recreation Ground	N13 East Ham	3.23	LBN
A17: Lady Trower Trust Playing Fields and Miers Close Nature Reserve	N13 East Ham	6.79	LBN
A18: Little Ilford Park	N16 Manor Park and Little Ilford	12.28	LBN
A19: Land adjacent to Barrington Playing Fields & Bar. Playing F.	N16 Manor Park and Little Ilford	2.20	LBN
A20: Langdon Academy	N12 East Ham South	10.16	LBN
A21: East Ham Sports Ground	N13 East Ham	8.25	LBN
A22: East Ham Sports Ground 2	N13 East Ham	0.15	LBN
A23: East Ham Sports Ground 3	N13 East Ham	0.11	LBN
A24: East Ham Sports Ground 4	N13 East Ham	0.03	LBN
A25: The Greenway 8	N11 Beckton	3.80	LBN
A26: Environment Agency Barking Barrier	N17 Gallions Reach	0.37	LBN
A27: Environment Agency Barking Barrier 3	N17 Gallions Reach	0.02	LBN
A28: Environment Agency Barking Barrier 2	N17 Gallions Reach	0.04	LBN
A29: Environment Agency Barking Barrier 4	N17 Gallions Reach	0.02	LBN
A30: The Greenway 1	N7 Three Mills	0.44	LBN
A31: New Beckton Park	N11 Beckton	6.74	LBN
A32: Olympic Park, Lee Valley	N8 Stratford and Maryland	54.05	LLDC
A36: Three Mills Green	N7 Three Mills	4.59	LLDC
A37: The Greenway and Abbey Lane	N7 Three Mills	3.07	LLDC
A38: The Greenway - Pudding Mill	N8 Stratford and Maryland	1.22	LLDC
A39: Alfreds Way Open Space - part	N17 Gallions Reach	1.89	LBN
Total adopted MOL (Ha)		211.8	

Figure 1: Adopted MOL and additional green space parcels assessed



2: Policy Context

2.1 This section sets out the context for the MOL review. It summarises the planning and policy relating to MOL and Green Belt. The information has informed the methodology used to assess the green space in Newham.

Metropolitan Open Land

2.2 The concept of MOL was first defined in the 1969 draft London Development Plan, which proposed a protective designation for larger areas of open land within the urban area. Upon approval of the Plan in 1976, the policy was adopted as 'land within the built-up area' that needs 'to be safeguarded just as much as the Green Belt'.



2.3 Since the concept was first introduced, it has remained a criteria of green space categorisation in London's metropolitan planning policy only. The 2023 National Planning Policy Framework (NPPF) (and its predecessors) therefore contains no references to MOL. There is also no universal guidance available on conducting a MOL review.

4: Key findings

4.1 This section summarises the key findings and recommendations from the MOL review. Full assessment profiles, scoring and recommendations based on the assessment are shown in the pro formas in **Appendix 1**.

4.2 **Table 3** presents the overall recommendations in terms of whether existing areas of MOL should retain their current designation, be subject to boundary change, or be subject to release; and whether the four new sites proposed for MOL designation meet the London Plan MOL criteria.

Table 3: Area assessment summary

	Meets London Plan Policy GG3 criteria (score 3 – 4)
	Does not meet London Plan Policy GG3 criteria (score 1 – 2)

	Criteria A	Criteria B	Criteria C	Criteria D	Conclusion
MOL Area	a. it contributes to the physical structure of London by being clearly distinguishable from the built-up area	b. it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London	c. it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value	d. it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.	<div></div> Parcel should be retained as MOL.
					<div></div> Parcel should be designated as new MOL.
					<div></div> Parcel retained as MOL with proposed boundary amendments.
					<div></div> Parcel should be omitted from MOL.
A1: Beckton District Park South	4	3	4	5	Parcel should be retained as MOL.
A2: Roding Valley Way-part	5	1	3	5	Parcel should be retained as MOL.
A3: Beckton District Park North	5	3	3	5	Parcel should be retained as MOL.
A4: The Greenway 7	5	3	4	5	Parcel should be retained as MOL.
A5: The Greenway 6	5	3	4	5	Parcel should be retained as MOL.
A6: The Greenway 5	5	3	4	5	Parcel should be retained as MOL.
A7: The Greenway 4	5	3	4	5	Parcel should be retained as MOL.

	Criteria A	Criteria B	Criteria C	Criteria D	Conclusion
MOL Area	a. it contributes to the physical structure of London by being clearly distinguishable from the built-up area	b. it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London	c. it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value	d. it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.	<div></div>
					Parcel should be retained as MOL.
					Parcel should be designated as new MOL.
					Parcel retained as MOL with proposed boundary amendments.
					Parcel should be omitted from MOL.
A8: Gooseley Playing Fields	4	2	2	5	Parcel should be retained as MOL.
A9: Alfreds Way Open Space-partly & Norwegian Playing Fields	3	2	2	5	Parcel should be retained as MOL.
A10: Alfreds Way Open Space - part	3	1	2	5	Parcel should be retained as MOL.
A11: The Greenway 3	5	3	4	5	Parcel should be retained as MOL.
A12: Roding Valley Way-part & Northern Lagoon, Beckton Sewage Works	5	3	3	5	Parcel should be retained as MOL.
A13: Folkestone Road Allotments & Gardens and partly Waterway	4	2	2	5	Parcel should be retained as MOL.
A14: The Greenway 2	5	3	4	5	Parcel should be retained as MOL.
A15: Cuckold's Haven	5	2	2	5	Parcel should be retained as MOL.
A16: Barking Road Recreation Ground	5	2	1	5	Parcel should be retained as MOL.
A17: Lady Trower Trust Playing Fields	5	2	2	5	Parcel should be retained as MOL.
A18: Little Ilford Park	5	3	2	5	Parcel should be retained as MOL.
A19: Land adjacent to Barrington Playing Fields & Bar. Playing F.	5	2	2	5	Parcel should be retained as MOL.

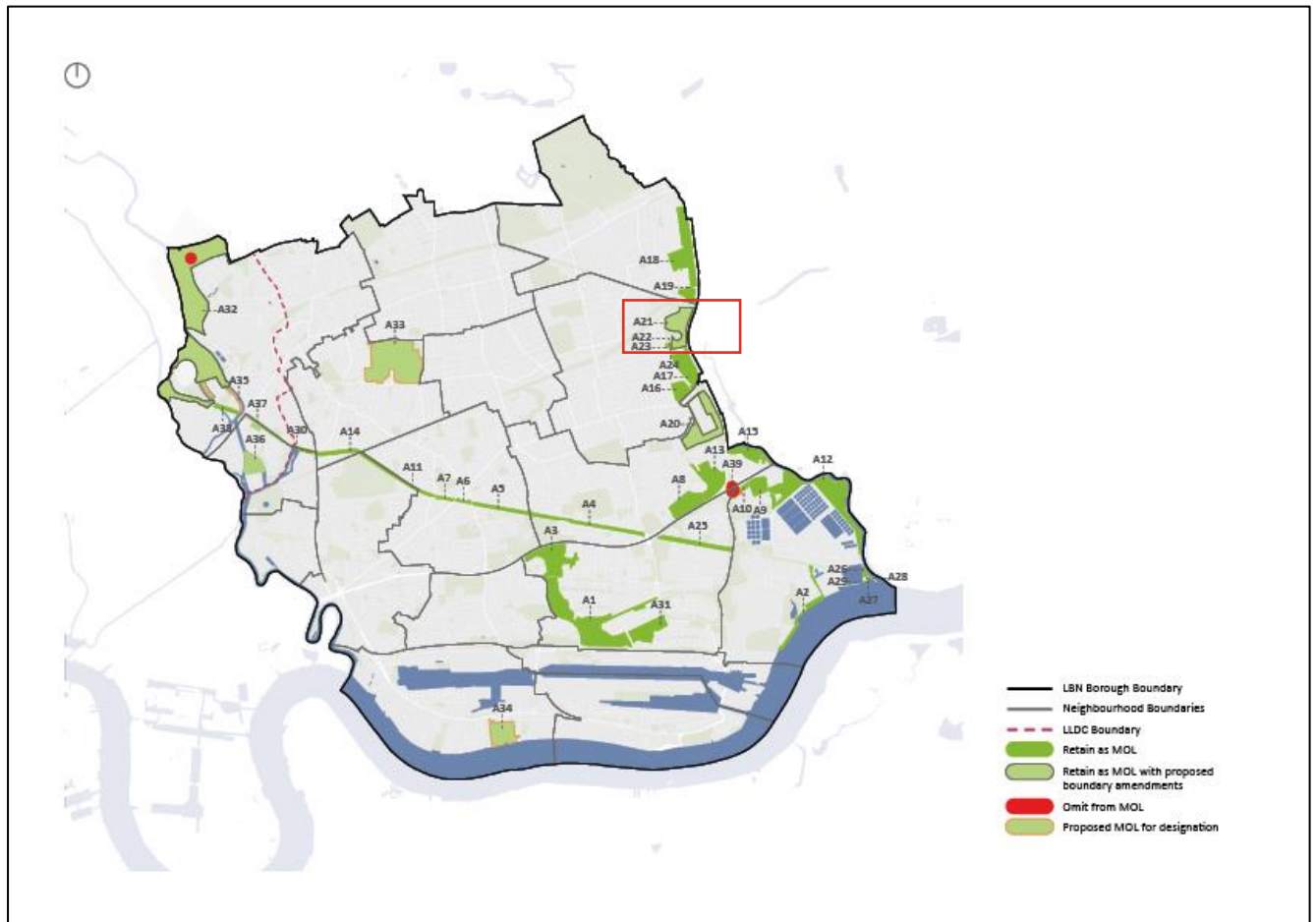
	Criteria A	Criteria B	Criteria C	Criteria D	Conclusion
MOL Area	a. it contributes to the physical structure of London by being clearly distinguishable from the built-up area	b. it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London	c. it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value	d. it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.	<div></div>
					<div></div>
					<div></div>
					<div></div>
					<div></div>
A20: Langdon Academy	3	3	2	5	Parcel retained as MOL with proposed boundary amendments.
A21: East Ham Sports Ground	3	2	2	5	Parcel retained as MOL with proposed boundary amendments.
A22:East Ham Sports Ground 2	3	1	2	5	Parcel should be retained as MOL.
A23: East Ham Sports Ground 3	3	1	2	5	Parcel should be retained as MOL.
A24: East Ham Sports Ground 4	3	1	2	5	Parcel should be retained as MOL.
A25: The Greenway 8	5	3	4	5	Parcel should be retained as MOL.
A26: Environment Agency Barking Barrier	4	1	3	5	Parcel should be retained as MOL.
A27: Environment Agency Barking Barrier 3	4	1	3	5	Parcel should be retained as MOL.
A28: Environment Agency Barking Barrier 2	4	1	3	5	Parcel should be retained as MOL.
A29: Environment Agency Barking Barrier 4	4	1	3	5	Parcel should be retained as MOL.
A30: The Greenway 1	5	3	4	5	Parcel should be retained as MOL.
A31: New Beckton Park	4	2	4	5	Parcel should be retained as MOL.

	Criteria A	Criteria B	Criteria C	Criteria D	Conclusion
MOL Area	a. it contributes to the physical structure of London by being clearly distinguishable from the built-up area	b. it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London	c. it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value	d. it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.	<div></div>
					Parcel should be retained as MOL.
					Parcel should be designated as new MOL.
					Parcel retained as MOL with proposed boundary amendments.
					Parcel should be omitted from MOL.
A32: Olympic II Park, Lee Valley	4	5	5	5	Parcel retained as MOL with proposed boundary amendments.
A33: West Ham Park	3	3	4	1	Parcel be designated as new MOL.
A34: Thames Barrier	5	2	2	5	Parcel be designated as new MOL.
A35: Waterworks River	5	5	5	5	Parcel be designated as new MOL.
A36: Three Mills Green	5	4	3	5	Parcel should be retained as MOL.
A37: The Greenway and Abbey Lane	5	4	4	5	Parcel should be retained as MOL.
A38: The Greenway - Pudding Mill	5	4	4	5	Parcel should be retained as MOL.
A39: Alfreds Way Open Space - part	2	1	2	5	Parcel should be omitted from MOL.

5: Conclusion and recommendations

5.1 This study reviewed the existing extent of Newham's MOL, including the designated MOL within the area currently administered by the LLDC, subdivided into 36 parcels and assessed their performance against the London Plan MOL criteria. In doing so, consideration was given to the strength of existing boundaries and whether they were 'clearly defined using physical features that are readily recognisable and likely to be permanent' (in line with NPPF paragraph 148). If green a space parcel did not this criteria, then recommendations were made to either revise the boundary or release the parcel.

Figure 2: MOL Review Recommendations




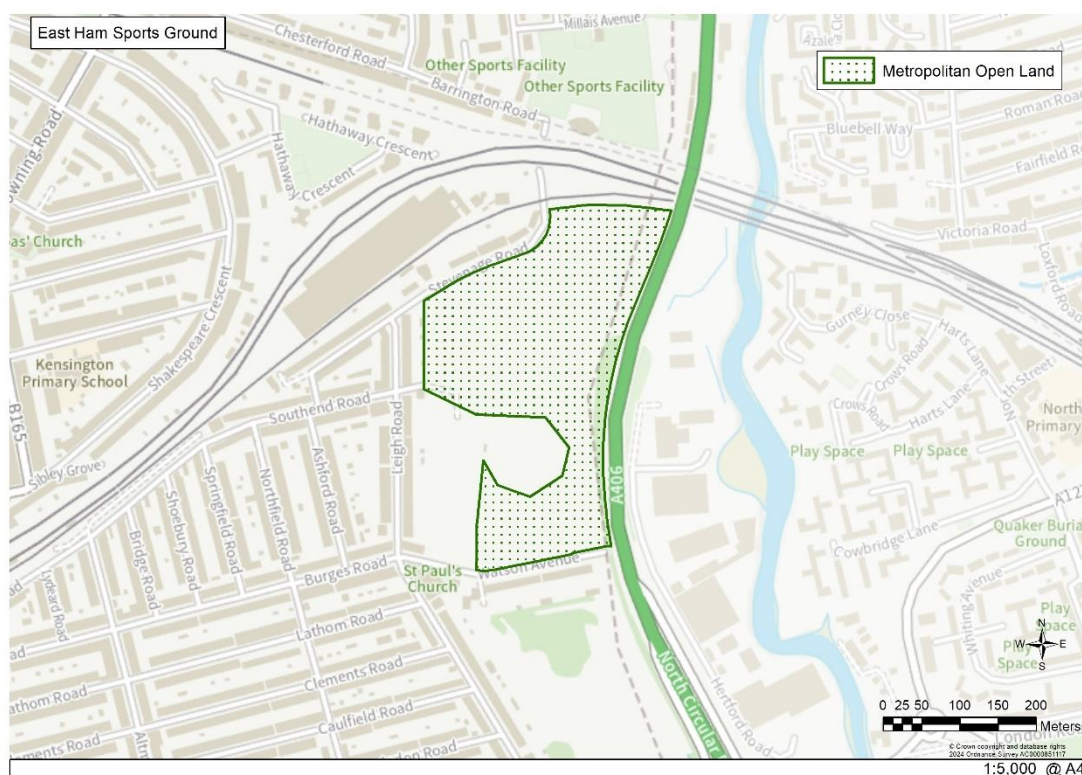
Glossary of Terms and Acronyms

Term	Definition
All London Green Grid (ALGG)	The All London Green Grid (ALGG) has been developed to provide a strategic interlinked network of high quality green infrastructure and open spaces that connect with town centre's, public transport nodes, the countryside in the urban fringe, the Thames and major employment and residential areas. This approach has been extremely successful in accelerating delivery of green infrastructure in East London through the East London Green Grid (ELGG). The adopted London Plan (2021) states: 'To help deliver on his manifesto commitment to make more than half of London green by 2050, the Mayor will review and update existing Supplementary Planning Guidance on the All London Green Grid – London's strategic green infrastructure framework – to provide guidance on the strategic green infrastructure network and the preparation of green infrastructure strategies'. Until this update is published the ALGG provides details of the Green Chain links of London-wide importance.
Green Chain	Areas of linked but separate open spaces and the footpaths between them. They are accessible to the public and provide way-marked paths and other pedestrian and cycle routes.
Green infrastructure (GI)	The multifunctional, interdependent network of open and green spaces and green features (e.g. green roofs). It includes the Blue Ribbon Network but excludes the hard-surfaced public realm. This network lies within the urban environment and the urban fringe, connecting to the surrounding countryside. It provides multiple benefits for people and wildlife including: flood management; urban cooling; improving physical and mental health; green transport links (walking and cycling routes); ecological connectivity; and food growing. Green and open spaces of all sizes can be part of green infrastructure provided they contribute to the functioning of the network as a whole.
LBN	London Borough of Newham
LLDC	London Legacy Development Corporation
LNR	Local Nature Reserve
MOL	Metropolitan Open Land
NPPF	National Planning Policy Framework

PPG	Planning Practice Guidance
SAC	Special Area of Conservation A SAC protects one or more special habitats and / or species – terrestrial or marine – listed in the EU Habitats Directive.
SANG	Suitable Alternative Natural Greenspace (SANG) is an area of land designated for recreational purposes that is designed to offset disturbance and pressures on sites that are protected for their habitat value under Conservation of Habitats and Species Regulations 2017 (as amended).
SINC	Areas of land chosen to represent the best wildlife habitats in London and areas of land where people can experience nature close to where they live and work. Sites are classified into Sites of Metropolitan, Borough and Local Importance depending on their relative value. SINC's are not legally protected, but their value should be considered in any land use planning decision. SINC's are approved by the London Wildlife Sites Board.

MOL Area 21 Assessment


 <p>A21: East Ham Sports Ground Adopted MOL</p>	MOL area	A21 East Ham Sports Ground
	Neighbourhood Area	N13 East Ham
	Status	Designated MOL Newham Local Plan 2018

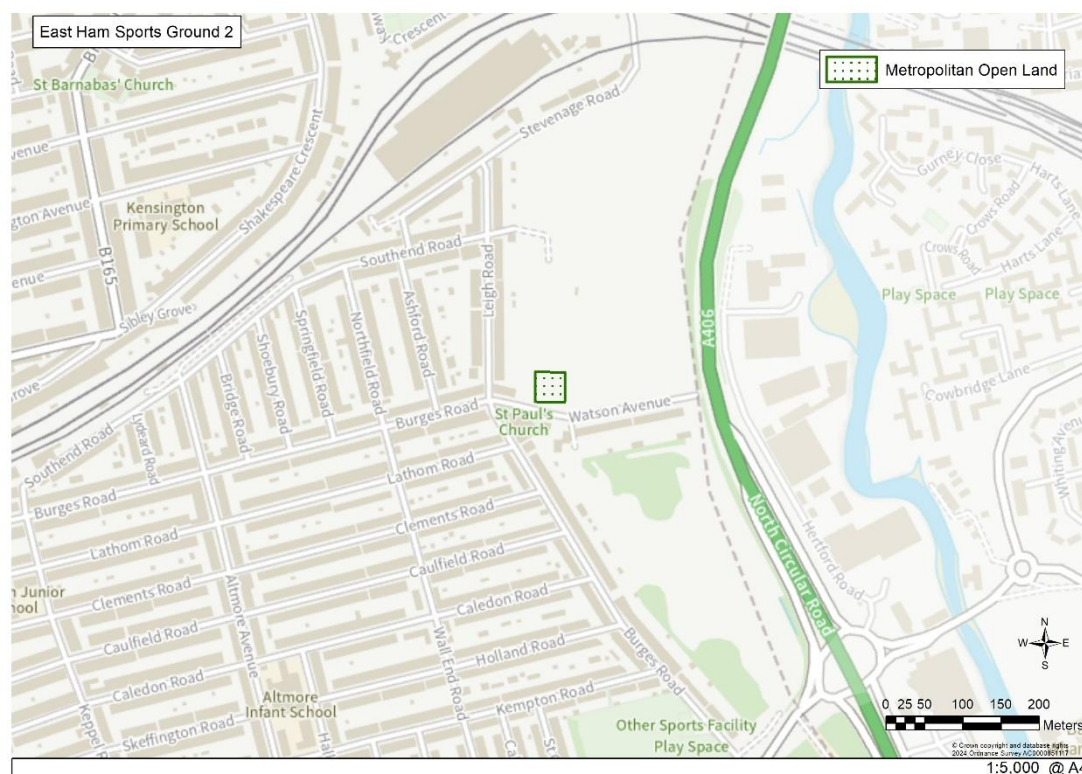


Physical structure / general description	Commentary
Type of green space	Amenity Greenspace
Size (ha)	8.25 Note, the size of the parcel remains the same after the proposed MOL boundary reconfiguration.
London Plan MOL Criteria A: 'Contributes to the physical	Moderate structural value. Built development is generally absent across much of the area.

structure of London by being clearly distinguishable from the built-up area'	<p>The sense of openness is well-defined but there is localised erosion by development and the urbanising influence of the adjacent residential land uses to the south, west and part of the northern boundary where the perimeter tree cover is less dense. It's location on the All London Green Grid (2012) GGA2 Epping Forest and Roding Valley strategic corridor means it contributes to the physical structure of London. However, boundaries along the eastern edge of the parcel reflect areas of hardstanding to the south and west of the gas holder. As a result, the site includes isolated parcels of MOL which do not reflect Criteria A.</p> <p>Whilst the overall parcel meets Criteria A, for the reasons set out above, it is proposed that the boundary is amended as illustrated to better fulfil the function of this criteria. The re-organisation of the MOL will form a more coherent parcel of MOL while protecting the core function of the site as a key structural feature in the Epping Forest and Roding strategic corridor.</p>
London Plan MOL Criteria B: 'Includes open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London'	<p>Weak-Moderate recreation value. The currently disused sports facilities (cricket) are identified as a 'Local' in Newham's Playing Pitch Strategy (2024). As such, it has potential to provide a sports pitch of neighbourhood level importance.</p> <p>There parcel therefore does not meet Criteria B.</p>
London Plan MOL Criteria C: 'Contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value'	<p>Weak recreational value. The parcel includes disused cricket pitch.</p> <p>Weak-Moderate biodiversity value. The majority of the parcel is a proposed Site of Importance for Nature Conservation (SINC) of Borough status (SINC: NeB29, Former Leigh Road Sports Ground).</p> <p>The parcel therefore does not meet Criteria C.</p>
London Plan MOL Criteria D: 'It forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria'	<p>Strong green link value, forming part of the wider All London Green Grid (2012) ALGG Epping Forest and River Roding Area (Area 2). The parcel therefore forms part of an extensive strategic green corridor network, contributing to a wider wildlife corridor due to its good quality habitat and biodiversity.</p> <p>The parcel therefore meets Criteria D.</p> <p>However, there are currently elements adjacent to the MOL designation which also support the strategic corridor function which are not currently designated as MOL. The proposed amendments to the boundary will better support Criteria D of the London Plan.</p>

MOL Area 22 Assessment

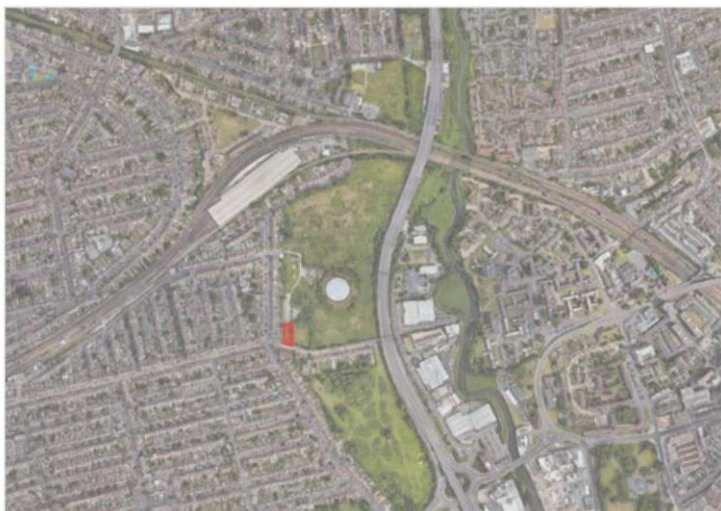
 <p>A22: East Ham Sports Ground 2</p>	MOL area	A22 East Ham Sports Ground 2
	Neighbourhood Area	N13 East Ham
	Status	Designated MOL Newham Local Plan 2018

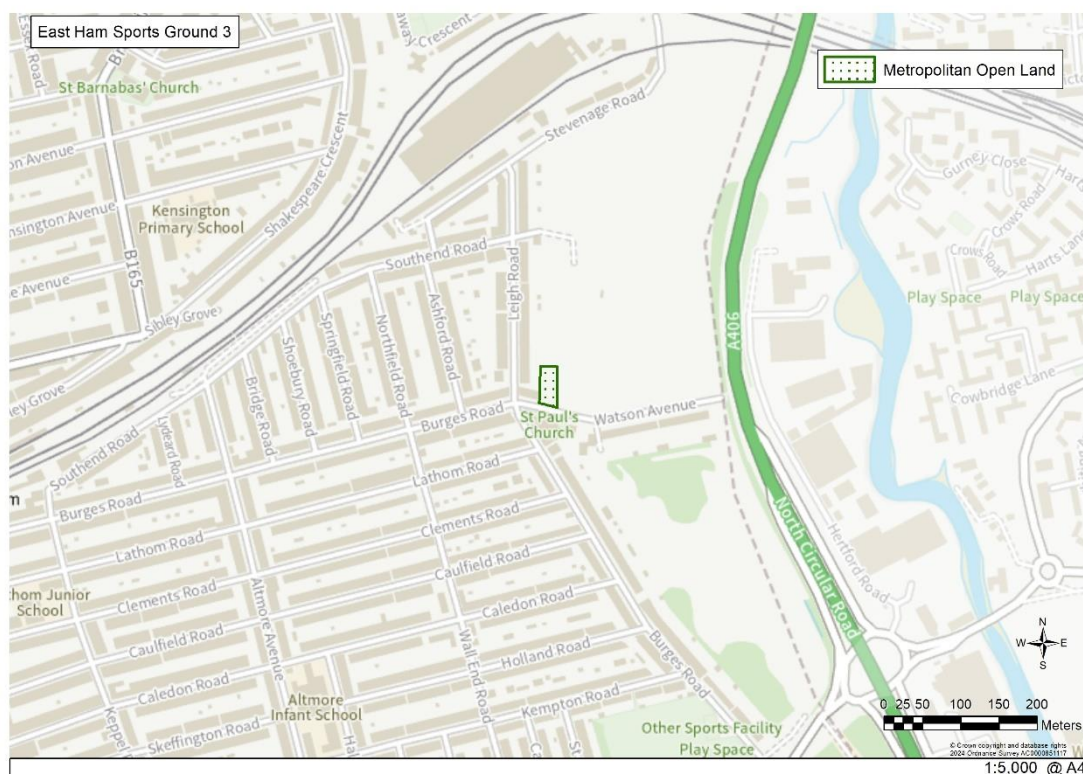


Physical structure / general description	Commentary
Type of green space	Amenity Greenspace
Size (ha)	0.15
London Plan MOL Criteria A: 'Contributes to the physical structure of London by	Moderate structural value. Built development is completely absent The perimeter of the site is lined with large mature trees, giving the parcel a very clear and highly defined sense of openness and separation.

being clearly distinguishable from the built-up area'	<p>Despite its small scale, it is bound to the east, west, south and north by MOL parcels and its location on the All London Green Grid (2012) GGA2 Epping Forest and Roding Valley strategic corridor means it contributes to the physical structure of London.</p> <p>The parcel therefore meets Criteria A.</p>
London Plan MOL Criteria B: 'Includes open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London'	<p>Weak - there are no open-air leisure, recreation, sport, arts or cultural activities in the parcel.</p> <p>The parcel does not meet Criteria B.</p>
London Plan MOL Criteria C: 'Contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value'	<p>Weak-Moderate biodiversity value. The majority of the parcel is a proposed Site of Importance for Nature Conservation (SINC) of Borough status (SINC: NeB29, Former Leigh Road Sports Ground).</p> <p>The parcel therefore does not meet Criteria C.</p>
London Plan MOL Criteria D: 'It forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria'	<p>Strong green link value, forming part of the wider All London Green Grid (2012) ALGG Epping Forest and River Roding Area (Area 2). The parcel therefore forms part of an extensive strategic green corridor network, contributing to a wider wildlife corridor due to its good quality habitat and biodiversity.</p> <p>The parcel therefore meets Criteria D.</p>

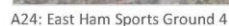
MOL Area 23 Assessment

 <p>A23: East Ham Sports Ground 3</p>	MOL area	A23 East Ham Sports Ground 3
	Neighbourhood Area	N13 East Ham
	Status	Designated MOL Newham Local Plan 2018



Physical structure / general description	Commentary
Type of green space	Amenity Greenspace
Size (ha)	0.11
London Plan MOL Criteria A: 'Contributes to the physical structure of London by being clearly distinguishable from the built-up area'	<p>Moderate structural value. Built development is completely absent.</p> <p>The sense of openness is well-defined but there is localised erosion by development and the urbanising influence of the adjacent residential land uses to the southern boundary where the perimeter tree cover is less dense. It's location on the All London Green Grid (2012)</p>

	<p>GGA2 Epping Forest and Roding Valley strategic corridor means it contributes to the physical structure of London.</p> <p>The parcel therefore meets Criteria A.</p>
<p>London Plan MOL Criteria B: ‘Includes open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London’</p>	<p>Weak - there are no open-air leisure, recreation, sport, arts or cultural activities in the parcel.</p> <p>The parcel therefore does not meet Criteria B.</p>
<p>London Plan MOL Criteria C: ‘Contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value’</p>	<p>Weak-Moderate biodiversity value. The majority of the parcel is a proposed Site of Importance for Nature Conservation (SINC) of Borough status (SINC: NeB29, Former Leigh Road Sports Ground).</p> <p>The parcel therefore does not meet Criteria C.</p>
<p>London Plan MOL Criteria D: ‘It forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria’</p>	<p>Strong green link value, forming part of the wider All London Green Grid (2012) ALGG Epping Forest and River Roding Area (Area 2). The parcel therefore forms part of an extensive strategic green corridor network, contributing to a wider wildlife corridor due to its good quality habitat and biodiversity.</p> <p>The parcel therefore meets Criteria D.</p>



East Ham Sports Ground 4

St Barnabas' Church

Kensington Primary School

St Paul's Church

Watson Avenue

North Circular Road

Other Sports Facility

Play Space

Playing Field

Metropolitan Open Land

Scale: 0 25 50 100 150 200 Meters

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1:5,000 @

48

	<p>Despite its small scale, it is bound to the east, west and north by MOL parcels and its location on the All London Green Grid (2012) GGA2 Epping Forest and Roding Valley strategic corridor means it contributes to the physical structure of London.</p> <p>The parcel therefore meets Criteria A.</p>
London Plan MOL Criteria B: ‘Includes open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London’	<p>Weak leisure / recreation / sport / arts or cultural value. There is no public access to this site.</p> <p>The parcel therefore does not meet Criteria B.</p>
London Plan MOL Criteria C: ‘Contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value’	<p>Weak-Moderate biodiversity value. The majority of the parcel is a proposed Site of Importance for Nature Conservation (SINC) of Borough status (SINC: NeB29, Former Leigh Road Sports Ground).</p> <p>The parcel therefore does not meet Criteria C.</p>
London Plan MOL Criteria D: ‘It forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria’	<p>Strong green link value, forming part of the wider All London Green Grid (2012) ALGG Epping Forest and River Roding Area (Area 2). The parcel therefore forms part of an extensive strategic green corridor network, contributing to a wider wildlife corridor due to its good quality habitat and biodiversity.</p> <p>The parcel therefore meets Criteria D.</p>

Appendix 9 - 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 reflects 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 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.