



# **Statement of Common Ground**

**Between**

**London Borough of Newham**

**and**

**St William LLP**

**Stage: R22 Local Plan N13.SA3 Former East Ham Gasworks**

**28th January 2026**

## 1. Introduction

- 1.1. This Statement of Common ground addresses key matters/issues between the two signatories, the London Borough of Newham and St William LLP, as relevant to the Newham Draft Submission Local Plan and its progression through the public examination.
- 1.2. St William LLP as a major landowner and developer in the borough including of four gasworks sites made a number of comments and suggested modifications to a number of policies in the draft Submission Local Plan to both the Regulation 18 and Regulation19 consultation drafts of the Local Plan.
- 1.3. This Statement of Common Ground sets out the areas of agreement between the London Borough of Newham and St William LLP, in respect of N13.SA3 Former East Ham Gasworks, and outlines resulting modifications to the Submission Local Plan which have been agreed by both parties.

## 2. Background

- 2.1. St William are part of the Berkeley Group, one of the largest residential developers in the UK and London delivering on average c. 4,000 homes per year.
- 2.2. St William specialises in sustainable brownfield regeneration, focusing on challenging and complex sites across London with a vision to transform the most challenging sites into places to live and to have a positive impact on society, the economy and nature.
- 2.3. There are a total of five sites within St William's portfolio, one of which is within Berkeley Capital's portfolio located within the London Borough of Newham. These sites are:
  1. **Bromley by Bow Gasworks** (Site Allocation N7.SA2 TwelveTrees Park and Former Bromley by Bow Gasworks);
  2. **TwelveTrees Park**, West Ham (Site Allocation N7.SA2 TwelveTrees Park and Former Bromley by Bow Gasworks);
  3. **Beckton Gasworks**, Armada Way, Beckton (Site Allocation N17.SA1- Beckton Riverside);
  4. **Former East Ham Gasworks**, Land at Leigh Road (Site allocation N13.SA3 Former East Ham Gasworks); and
  5. **Former Abbey Lane Gasworks**, off Rick Roberts Way, Stratford (within the former LLDC) (Site Allocation N8.SA7 Rick Roberts Way).
- 2.4. Collectively, these sites will deliver in excess of 10,000 new homes for the borough; c. 30,000 sqm of non-residential floorspace including a primary school and a secondary school; community and leisure uses; health facilities; over 20 ha of new and publicly accessible open space and significant infrastructure works including upgrades to river walls and refurbishment of seven Grade II listed gasholders.
- 2.5. By virtue of their former use as gasworks they are highly complex and constrained sites which in all instances require substantial remediation works. All of St William's and Berkeley Capital's sites have either outline or detailed planning permission, or resolution to grant planning permission and are already under construction or due to be developed. The exception being the former East Ham Gasworks which comprises of a gasholder and associated gas operational equipment located on previously developed land accessed off Leigh Road which is located within a wider setting of open space designated as Metropolitan Open Space (not currently accessible to the public).

### 3. Examination in Public

- 3.1. Following the Examination in Public hearing session for the Former East Ham Gasworks (N13.SA3) Site Allocation that was held on the 11<sup>th</sup> of December 2025, the Inspector issued the following Action Point (AP).

**AP18.** *Council to prepare a statement of common ground with St William Homes and the GLA<sup>1</sup> that includes a potential modification to policy N13.SA3, and if necessary changes to the MOL boundary on the submitted policies map, that would allow a form of development which has a reasonable prospect of being viable during the plan period.*

- 3.2. In response to this action point, this Statement of Common Ground has been prepared to address the issues raised by St William Homes LLP in relation to the site's constraints and the significant abnormal costs associated with its development.


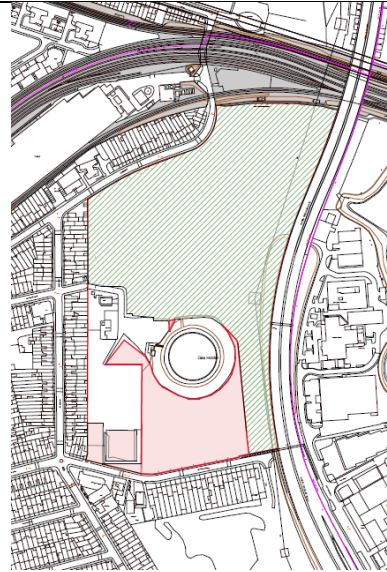
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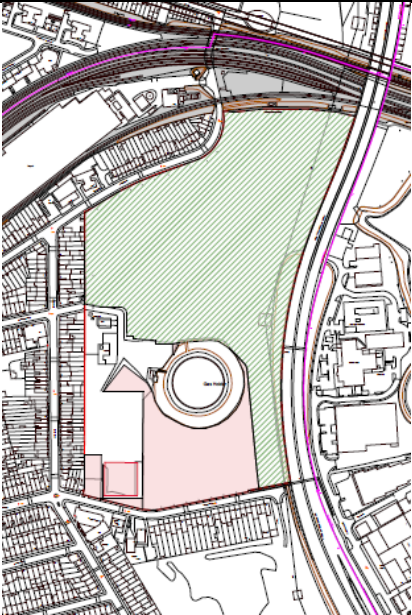
<sup>1</sup> London Plan policy G3 part C "any alterations to the boundary of MOL should be undertaken through the Local Plan process in consultation with the Mayor".

#### 4. Agreed amendments between London Borough of Newham and St William Homes LLP

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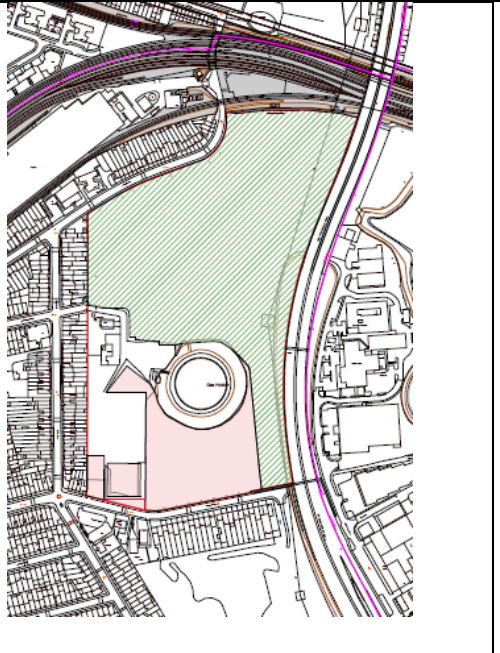
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Chapter	Policy / Section / Paragraph	Agreed outcome			
Neighbourhoods	N8.SA2 Stratford Station	In relation to the Action Point 18 (AP18) raised by the Inspector, the following proposed modifications to the Local Plan Policy Map have been agreed between both parties:			
		Site allocation / location	Change required	Regulation 19	Proposed modification
		East Ham Sports Ground  MOL A21 (shown within red line)	De-designation of 1.55ha of adopted Metropolitan Open Land		

		<p>East Ham Sports Ground 2</p> <p>MOL A22 (shown within red line)</p>	<p>De-designation of 0.15ha of adopted Metropolitan Open Land</p>	 <p>This map shows the area around East Ham Sports Ground 2. A green hatched area represents Metropolitan Open Land (MOL). A red line indicates the boundary of the de-designated area. The map includes labels for roads such as Steneage Road, North Circular Road, and Watson Avenue. Other features include St Paul's Church, Watson Avenue, and various play spaces. A scale bar and north arrow are also present.</p>	 <p>This detailed map shows the East Ham Sports Ground 2. A large area is highlighted in pink, indicating the de-designated area. The map shows the surrounding urban environment, including roads and buildings. A red line outlines the boundary of the de-designated area.</p>	
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		East Ham Sports Ground 3	De-designation of 0.11ha of adopted Metropolitan Open Land	
		MOL A23 (shown within red line)		



	<p>East Ham Sports Ground</p> <p>MOL A24 (shown within red line)</p>	<p>De-designation of 0.03ha of adopted Metropolitan Open Land</p>		
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## **5. MOL Boundary changes**

- 5.1. It is agreed that the information submitted demonstrates that the 10.3ha industrial site is large enough to create its own character; contains a 1903 gasholder (equivalent height of 15 storey/ 47mAOD gasholder frame); pressure reduction station; areas of hard standing and car storage; high pressure gas mains (live); c.50m super grid lattice electricity pylon; contamination; and UXO. The site is previously developed land, is private land, inaccessible and closed off to the public. It is agreed that it will remain closed off to the public unless wholesale remediation and UXO works are undertaken to make it safe for public access.
- 5.2. Site allocation N13.SA3 designates the site for development on the hard standing areas only (not designated as MOL). R22 Policies BFN1(e), BFN1(f), N13(11), N13(12) and GSW1 and the site allocation also seek to open the site up to the public, however it is agreed that this primary objective is not deliverable as it does not recognise the site constraints that must be addressed before public access can occur.
- 5.3. The MOL designation is supported by evidence base EB068 and EB069. The Site designation relates to MOL Table 1 (EB068) A21 (8.25ha); A22 (0.15ha); A23 (0.11ha); and A24 (0.03ha).
- 5.4. As part of the R22 plan, the Council undertook a MOL review of the site and proposed a revised MOL boundary and part de-designation of MOL A21 (8.25ha) because whilst the sense of openness is well-defined overall across parts of the MOL (principally north of the gasholder), there is localised erosion by development and the urbanising influence of the adjacent residential land uses and gasholder. Boundaries along the western edge of the parcel contain large areas of hardstanding. As a result, the site includes isolated parcels of MOL which do not reflect London Plan Policy G3 Criteria (B)(1). None of the MOL meets London Plan Policy G3 Criteria (B)(2 or 3). The Council therefore proposed a MOL boundary change to better fulfil the function and the re-organisation of the MOL to form a more coherent parcel of MOL.
- 5.5. St William's hearing statement also identified unintended additions to the MOL designation around the gasholder and pressure reduction station, and it is agreed that these are not to be new MOL designations.
- 5.6. In addition to MOL parcel A21 (8.25ha), the following MOL parcels also form part of site allocation N13.SA3: A22 (0.15ha); A23 (0.11ha); and A24 (0.03ha).
- 5.7. Newham's MOL Review (2025) confirms that these parcels score relatively poorly against London Plan Policy G3 criteria, meeting only Criteria A (B1: physical structure) and failing to meet Criteria B (B2: open-air facilities) and C (B3: historic / recreational / biodiversity value).
- 5.8. Site allocation N13.SA3 seeks to deliver a comprehensive regeneration scheme, including:
  - Residential development
  - Publicly accessible green space
  - A community facility
  - Reinstatement of disused sports pitches



5.8 The site is identified in Newham's Playing Pitch Strategy (2025) as a key opportunity to reinstate cricket pitch provision, supporting borough-wide objectives for enhanced sports and recreation infrastructure.

5.9 Following the Local Plan Hearing Session, 11<sup>th</sup> December 2025, the Council is proposing a further boundary amendment to MOL parcel A21, beyond that identified in Newham's MOL Review (2025).

5.10 In addition, the Council is proposing to de-designate MOL parcels A22, A23 and A24. Please see Appendix 1 for an illustration of the MOL parcels proposed for de-designation.

5.11 In response to the Inspectors' Action Point 18, the Council has produced an additional Appendix to support Newham's 2025 MOL Review (ED019a). This document sets out all the proposed MOL boundary amendments, illustrated by maps, and provides a summary of exceptional circumstances where relevant.

5.12 Further discussions with St William and the Council, have resulted in an additional minor amendment to the southeastern boundary line of the MOL parcel published in the Council's MOL Exceptions Appendix (ED019a). It is agreed by both parties that this further minimal de-designation (0.14ha) will maximise housing delivery, optimise green space provision within the site allocation and support the overall delivery of sustainable development. This is a loss of 1.55ha of MOL from parcel A21 and not 1.41ha, as had been set out in the MOL Exceptions Appendix (ED019a).

5.13 The appendix details the exceptional circumstances for the proposed MOL de-designations associated with site allocation N13.SA3, which are as follows:

**Exceptional circumstances**

5.14 The site is characterised by elements of hardstanding, contamination, and a lack of public access, which significantly limits its functional and environmental value.

5.15 Initial investigations, undertaken by St. William, have identified significant contamination, including Aliphatic, Aromatic hydrocarbon bands, BTEX, Chrysotile cement, Cyanide, Heavy metals, and Naphthalene, as well as unexploded ordnance from World War II.

5.16 The existing MOL designations, adopted in the Local Plan (2018), severely restricts the developable area within Site Allocation N13.SA3, rendering the site unlikely to deliver a viable scheme during the plan period. Without enabling development, the remediation works, publicly accessible green space, and the reinstatement of cricket facilities would not be achievable.

5.17 Newham is significantly under-provided with green space, offering only 0.72 hectares per 1,000 residents, well below neighbouring boroughs, as evidenced in Newham's Green and Water Infrastructure Strategy (2025). Development of this site will deliver additional publicly accessible green space, helping to address this deficiency while securing biodiversity enhancements.

5.18 The borough's need for housing, improved access to green space, and delivery of sports facilities—supported by evidence in Newham's Playing Pitch Strategy (2025) and Green and

Water Infrastructure Strategy (2025)—constitutes the exceptional circumstances required to justify a change to the MOL boundary.

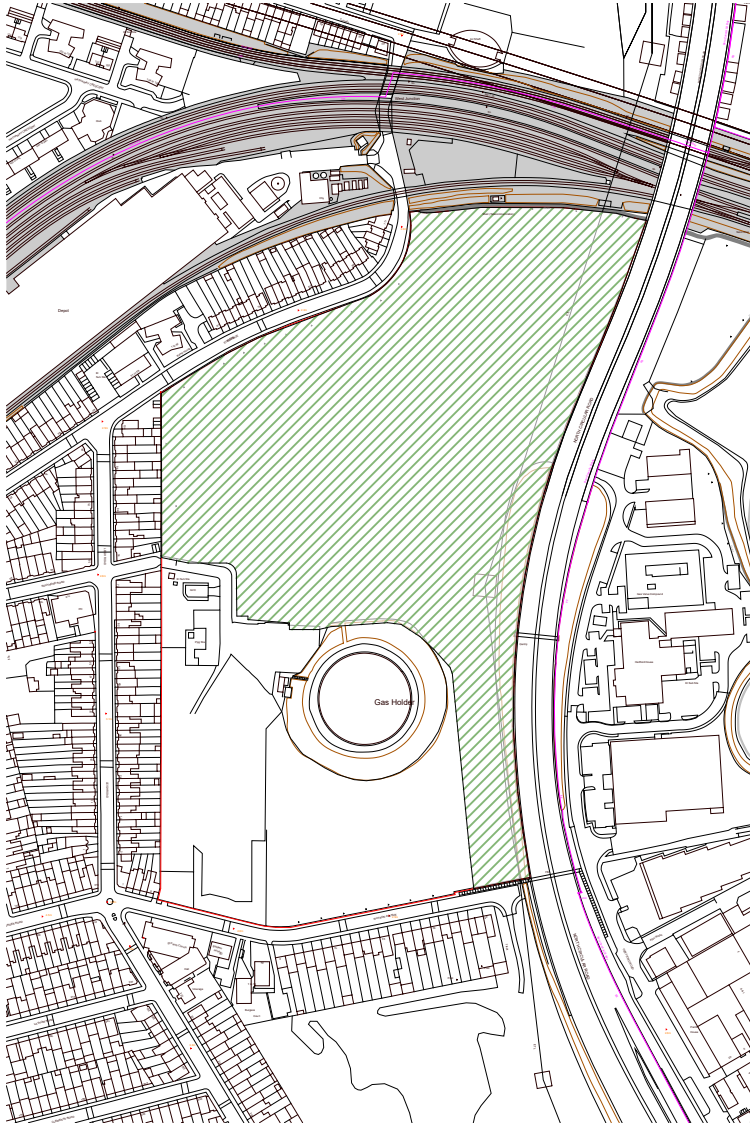
- 5.19 Residential development should be limited to the minimum necessary to remediate the site; enable public access; delivery of the reinstated cricket pitch; retention of green space where possible and enhancement where retained, with a strong emphasis on maximising greening and biodiversity gains. The site allocation will prioritise the retention and enhancement of green space, with a strong emphasis on maximising greening and biodiversity gains. Housing proposals will be required to optimise the mix to deliver the highest possible proportion of genuinely affordable homes, within the constraints of viability, remediation requirements and opening the site up for public access.
- 5.20 The proposed MOL boundary amendments represent a loss of 1.84 ha MOL (from 8.54 ha to 6.7ha), which is a 22% change. This is a minimal and proportionate adjustment that will not compromise the strategic function of MOL within the borough. The remaining MOL parcel (A21) will continue to satisfy the London Plan Policy G3 criteria (B1 and B4). The amendment ensures a coherent and defensible boundary, while enabling delivery of site allocation objectives, including remediation, public access, landscape and biodiversity improvements. Overall, the change strengthens the integrity and functionality of the MOL network and delivers significant long-term public benefit that represent exceptional circumstances.
- 5.21 It is agreed that exceptional circumstances have been fully evidenced and justify the MOL boundary changes taking into account the purposes for including land in MOL set out in LP G3 Part B.

## 6. Signatories

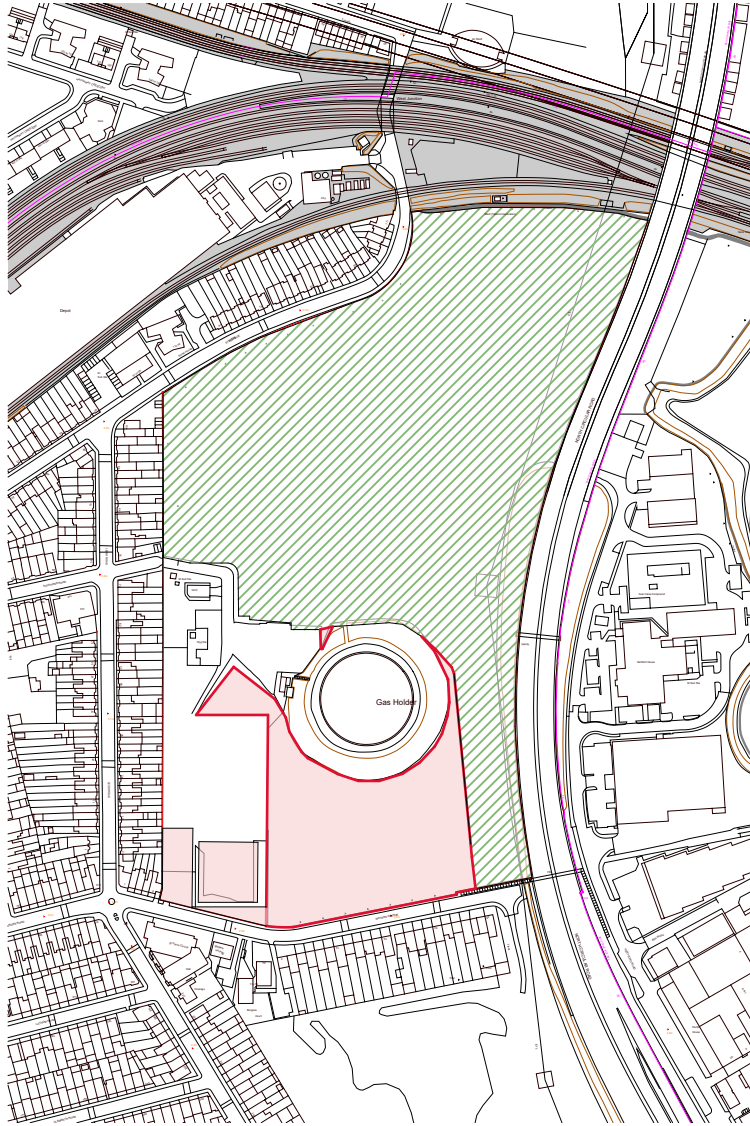
6.1. We confirm that all parties consider that this statement reflects the agreed position of the Submission Newham Local Plan.

<b>Signed on behalf of London Borough of Newham:</b>  <b>Name:</b> Danalee Edmund <b>Date:</b> 27 January 2026 <b>Position:</b> Interim Planning Policy Manager	<b>Signed on behalf of St William Homes LLP:</b>  <b>Name:</b> SIMON LEWIS <b>Date:</b> 27 JANUARY 2026 <b>Position:</b> Planning + Development Director
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## **Appendix 1 – MOL parcels proposed for de-designation**



MOL to be retained within A21



MOL proposed for release from A21

Rev	Date	Description	Drawn	Chkd
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Drawing Status  
Draft

Client  
St William



Project  
Former East Ham Gasworks

Drawing Title  
MOL Parcel A21

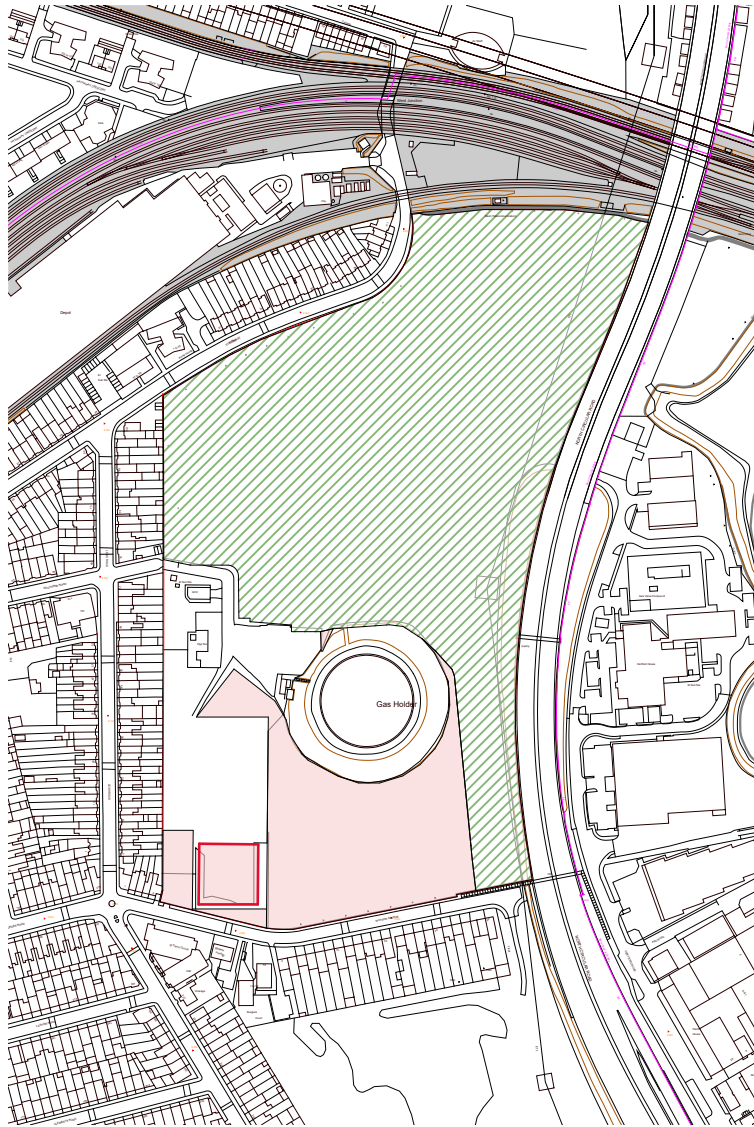
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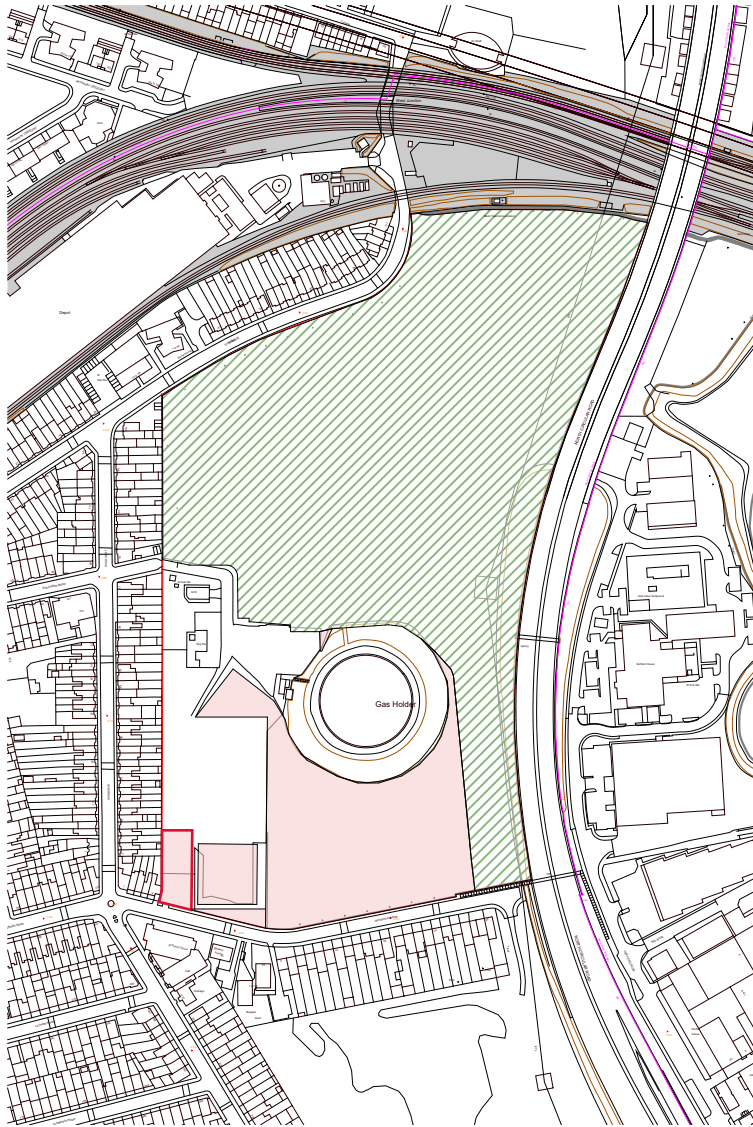
Scale Bar



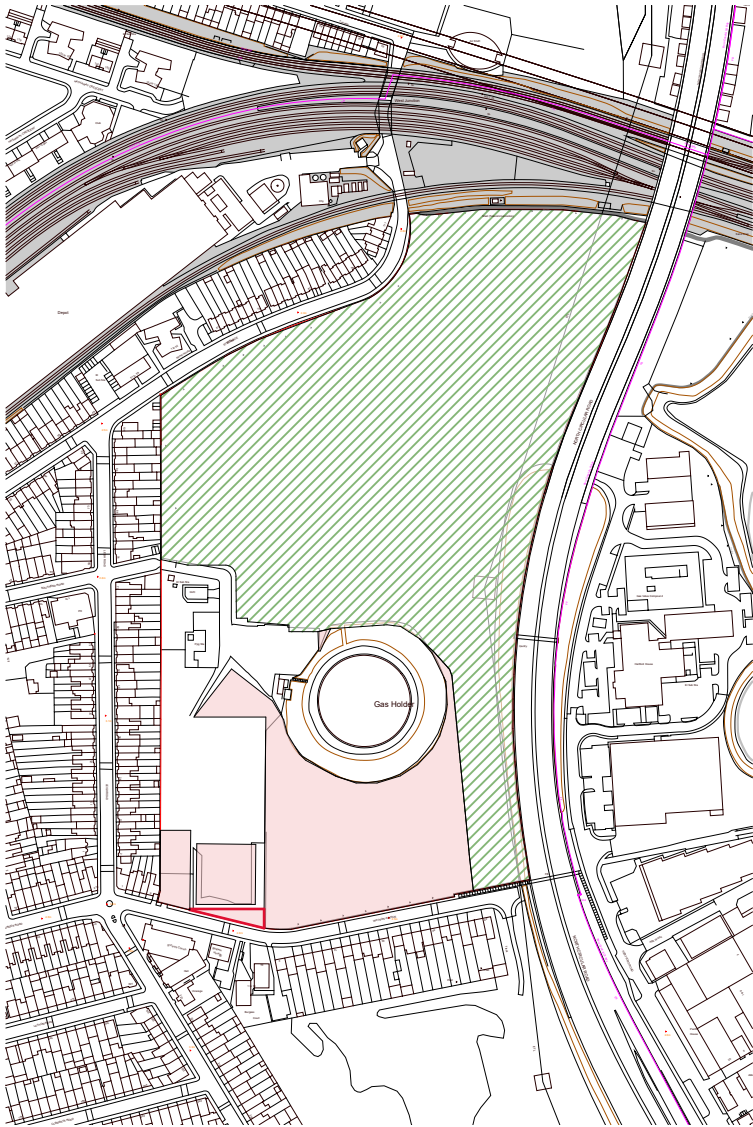




MOL Parcel A22



MOL Parcel A23



MOL Parcel A24

Rev	Date	Description	Drawn	Chkd
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Drawing Status  
Draft

Client  
St William



Project  
Former East Ham Gasworks

Drawing Title  
MOL Parcels A22-24

Scale @A3 1 : 5000 Job Ref. 02424

Drawing No. 11 Revision.

Scale Bar

