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Good Afternoon

Please find attached representations made to the Regulation 19 Local Plan on behalf of St William Homes.

Please confirm receipt and let me know if any issues receiving.

Kind regards
Dan



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Representations to the London Borough of Newham Draft Submission Local Plan (Regulation 19) (September 2024)

Made on behalf of St
William Homes LLP

SEPTEMBER 2024

Q200225

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1 Introduction

- 1.1 Quod is instructed by St William Homes LLP (“St William”) as part of the Berkeley Group to submit representations to the London Borough of Newham (LBN) Draft Submission Local Plan (Regulation 19) (June 2024), which was published for consultation in July 2024 and remains open for comment until 20th September 2024.
- 1.2 St William welcomes the opportunity to continue to engage with the Local Plan process and provide representations to this Draft Submission version of the Local Plan. The comments enclosed should be read in the context of the comments submitted to the Regulation 18 consultation draft in February 2023.

St William

- 1.3 St William regenerates and transforms derelict former gasworks sites. Their driving purpose is to create high quality homes, strengthen communities and improve people’s lives through fantastic placemaking. St William specialise in long-term brownfield regeneration, focusing on challenging and complex sites. Very few developers have the expertise to regenerate and deliver homes and new communities on such sites, however, St William has an excellent track record of doing so.
- 1.4 Former gasworks sites have a critical role to play in the delivery of needed homes in London; the London Plan identifies former utilities sites (including gasworks) as a strategic brownfield source to deliver housing, reflecting the NPPF’s emphasis on making the most effective and efficient use of brownfield land for housing supply.
- 1.5 St William is part of Berkeley Group, which in total has 26 sites in the portfolio at present under construction within London, with a further 12 in the pipeline.
- 1.6 Four of these sites located within the Borough:
 - 1) Twelvetreets Crescent, Bromley by Bow Gasworks;
 - 2) Beckton Gasworks, Armada Way, Beckton;
 - 3) Land at Leigh Road, Former East Ham Gasworks; and
 - 4) Former Abbey Lane Gasworks Site, off Rick Roberts Way, Stratford (currently within LLDC).
- 1.7 In addition to the four St William sites listed above, Berkeley Homes (South East London) Limited another division of the Berkeley Group have a further land holding at Twelvetreets Park, West Ham. This site immediately adjoins the Bromley by Bow Gasworks to the east and sharing the same site allocation (adopted site allocation S11 and draft site allocation N7.SA2).
- 1.8 Berkeley Homes (South East London) (BHSEL) has a proven track record for delivering sustainable and inclusive mixed-use regeneration projects across London and the South East

and have a reputation for delivering high quality homes and associated uses. They work with key stakeholders to tackle the shortage of good quality homes and make a lasting and sustainable contribution to the landscape and communities that they create.

- 1.9 These representations have been prepared in relation to all four St William Sites within LBN: the Bromley by Bow Gasworks; Beckton Gasworks, East Ham Gasworks and the Former Abbey Lane Gasworks.
- 1.10 Where comments are made in relation to general policies they are made on behalf of Berkeley Homes (South East London) Limited as well however separate representations are submitted (by Berkeley Homes (South East London)) in relation to the site allocation for Twelvetreepark.

Bromley by Bow

- 1.11 Bromley by Bow Gasworks is located between West Ham and Bromley by Bow and measures 9.15 ha in total. It contains seven Grade II listed gasholders, the only kind in the world and four residential dwellings located to the north-eastern corner of the Site. A site plan is enclosed at **Appendix 1**.
- 1.12 The Site is a significant and strategic site located within the Poplar Riverside Opportunity Area and allocated within the existing Local Plan under Site Allocation S11 Parcellforce and within the draft Local Plan (Regulation 19) as Site Allocation N7.SA2 TwelveTrees Park and Former Bromley by Bow. A copy of the existing site allocation can be found at **Appendix 2** and the draft site allocation at **Appendix 3**. As noted above, Bromley by Bow Gasworks shares this strategic site allocation with the adjoining TwelveTrees Park development, a 10.69ha site which is owned by a separate division of the Berkeley Group (Berkeley Homes (South East London) Limited, and which is already subject to an extant planning permission.
- 1.13 St William are looking to bring the Site forward for redevelopment in line with the requirements of the site allocation. It is an important site for the borough, as an underutilised, vacant brownfield site that is allocated within both the current adopted Plan and draft Local Plan and it provides a significant opportunity to assist Newham with delivering against its Local Plan and Corporate objectives.
- 1.14 In line with adopted Site Allocation S11 and draft Site Allocation N7.SA2 this includes the delivery of much needed housing, employment floorspace that meets a local need, the provision and completion of new connections between Bromley by Bow and West Ham, new open space and importantly the viable re-use of the listed gas holders which are currently inaccessible to the public. Importantly, Bromley by Bow Gasworks has the ability to join together a number of disparate sites and land uses in this part of the Lower Lea Valley, delivering an iconic development and creating a more coherent sense of place.
- 1.15 St William secured resolution to grant from LBN's Strategic Development Committee on 18th June 2024 following several years of pre-application discussions with planning and policy officers at LBN and hopes to be able to start on site in Q4 2025 with the first homes coming forward within the first five years of the adopted Local Plan.

Beckton

- 1.16 Beckton Gasworks is an 84.12 acre site located in the east of the borough fronting the River Thames and forming broadly a horse shoe shape.
- 1.17 The Site is bound to the north by Armada Way and Gallions Reach Shopping Park, to the north east by Gemini Business Park, beyond which lies the Thames Water Beckton Sewage Treatment Works and wraps around the Docklands Light Railway Beckton Depot which sits broadly within the centre of the Site. An area within the north west of the Site contains the pressure reduction system and is excluded from the site ownership. It is bound to the south by GLA owned land which is currently scrubland. An area of scrubland and a large attenuation pond fronts the River Thames and forms the eastern boundary of the Site.
- 1.18 There is limited built form on the Site with the vast majority of infrastructure, including the gasholders themselves dismantled and removed from the Site. A site plan is enclosed at **Appendix 4**. The Site is a significant strategic site for both LBN and the GLA located within the Royal Docks and Beckton Riverside Opportunity Area and allocated within a wider site allocation within the adopted Local Plan under Site Allocation S01 Beckton Riverside (a copy of which can be found at **Appendix 5**) and within the draft Local Plan (Regulation 19) as Site Allocation N17.SA1 Gallions Reach (copy enclosed at **Appendix 6**). It presents a significant opportunity to deliver housing and employment growth and regeneration in LBN and based on initial feasibility studies St William believe that the wider site allocation could deliver significant housing for the area and Newham.
- 1.19 The Beckton Riverside site or Gallions Reach as it is now referred to in the draft Local Plan has been earmarked for a new DLR station however there is currently uncertainty over the funding and delivery timing of the DLR extension. Current and emerging planning policy note that the extent of development at Beckton Riverside will be dependent on the provision of this strategic infrastructure. Consequently, St William have been working in partnership with LBN, GLA and Royal Docks Development Team, TfL and Homes England on the Outline Business Case to government as part of the Thamesmead and Beckton Riverside Public Transport Steering Group and Delivery Board.
- 1.20 Notwithstanding this, it is believed that an Early Delivery Phase of development which benefits from existing and improved local transport measures such as buses, and its proximity in terms of walking and cycling distance to Gallions Reach DLR station could come forward to kick start regeneration and private sector investment, ahead of or in parallel with the DLR funding bid process and delivery of the new DLR station at Beckton Riverside. It is on this basis that St William commenced pre-application discussions with planning and policy officers at LBN and have submitted a planning application for the Early Delivery Phase of development.
- 1.21 Furthermore, St William notes and welcomes the recommendation outlined within the evidence base for the East London Joint Waste Plan for the removal of the Schedule 2 Waste Allocation sites meaning Beckton Riverside is no longer identified as a potential waste site for strategic waste management.

East Ham

- 1.22 The former East Ham Gasworks is located between East Ham and Barking stations in the eastern part of the Borough. The Site is bound to the north by Stevenage Road and associated

residential uses, to the east by the North Circular Road (A406), to the south by Watson Avenue and associated residential uses, and to the west by Leigh Road and associated residential uses. A site plan is enclosed at **Appendix 7**. The Site comprises of a gasometer and associated gas operational equipment located on previously developed land accessed off Leigh Road. It is located within a wider setting of unmaintained open space designated as Metropolitan Open Land that is not currently accessible to the public. There are also multiple gas easements and Thames Water structures which cross the site.

- 1.23 The adopted Local Plan (2018) identifies the principal areas of previously developed land, and the MOL classification (GS82). The Site is not subject to a site specific allocation within the adopted Local Plan. The Site has been allocated within the East Ham neighbourhood (N13 East Ham) and as a new draft site allocation N13.SA3 Former East Ham Gasworks within the Local Plan Refresh Regulation 19 draft (copy enclosed at **Appendix 8**).

[Rick Roberts Way](#)

- 1.24 The Site was part of a larger former gasworks, located between Rick Roberts Way and Abbey Lane and measures 0.98 ha in total. 0.07 of the Site, including the Pressure Reduction Station, electricity mast and sub-station will be retained on the site. A site plan is enclosed at **Appendix 9**. The remainder of the Site, comprising 0.91 ha, currently contains various infrastructure associated with the former use as a gasworks site and comprises the developable area. The gasholder frames have already been dismantled and the remainder of the gasworks infrastructure will be removed from the site.
- 1.25 The Site is a significant site, allocated in the Legacy Development Corporation (LLDC) Local Plan (Adopted July 2020) and allocated in the draft Newham Local Plan (Regulation 19) as part of Site Allocation N8.SA7 Rick Roberts Way. A copy of the draft site allocation at **Appendix 10**. As noted above, the gasworks site shares this strategic allocation with the land to the north west, owned by LLDC and LBN.
- 1.26 An application for the redevelopment the site was submitted to LLDC in December 2023. It is anticipated that the proposals will be determined at planning committee in October 2024.

[TwelveTrees Park](#)

- 1.27 The TwelveTrees Park site, is a large tract of derelict brownfield land, adjacent to a major transport interchange at West Ham. It presents a significant opportunity to create a new piece in Newham's urban fabric in a highly accessible and sustainable location. The Site has an extant hybrid planning permission (reference: 17/01847/OUT) for the comprehensive redevelopment of the site, which has been implemented in part with the first phase of development under construction. A Section 73 and Reserved Matters Application have recently been submitted to LBN to make necessary amendments to the extant permission.
- 1.28 TwelveTrees Park represents significant investment in the Borough and includes new transport infrastructure, a new London scale park, significant housing delivery and a new Local Centre. The proposals are founded in BHSEL's commitment to quality and placemaking which is reflected in the landscaping and architectural quality proposed by the development.

Context to Representations to Draft Submission Local Plan (Regulation 19)

- 1.29 Given the specific nature of former gasworks sites we have enclosed at **Appendix 11** a document outlining the relevant planning policies with respect to former gasworks sites and explain how planning policy has been revised to take account of the exceptional abnormal circumstances that relate to sites of these nature.
- 1.30 These representations provide comments on a number of the policy sections set out in the Draft Submission version as well as the relevant designated Neighbourhoods and site allocations.
- 1.31 To assist with the consideration of our representations, we have benchmarked the draft submission (Regulation 19) policies against the requirements of the National Planning Policy Framework 2023 (“The Framework”).
- 1.32 Paragraph 11 is most relevant, namely the presumption in favour of sustainable development. It requires that “plans and decisions should apply a presumption in favour of sustainable development”.
- 1.33 For plan making this means the following:
- “a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;”*
- 1.34 We have also considered the Regulation 19 policies against paragraph 35 of the NPPF, and whether they can be considered sound. The NPPF considers plans to be sound if they meet the following tests:
- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) **Justified** – an appropriate strategy; taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”*
- 1.35 Overall St William provides support for the general direction of the draft Local Plan and is pleased to comment on this proposed submission draft. Whilst we do not repeat previous commentary outlined in the Regulation 18 representations we do continue to make a number

of specific comments in relation to certain policy requirements and site allocations particularly where we consider that as currently drafted they are not in line with paragraph 35 of the NPPF.

- 1.36 In order to achieve its objectives, the Local Plan needs to ensure it is deliverable and directs development within the borough positively. Paragraph 31 of the NPPF sets out the process for preparing and reviewing Local Plan.

“The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.”

- 1.37 As demonstrated through slow housing delivery rates over the last few years, development, particularly on complex brownfield sites, is facing challenging economic conditions. Increasing build costs, high interest rates, new regulations and policy layering is severely impacting the viability of projects. In reviewing their Local Plan LBN need to ensure the Plan allows for sufficient flexibility in the application of their policies to support good, well designed, sustainable development to come forward. This is imperative to ensure the Local Plan facilitates the delivery the much-needed housing for the borough.
- 1.38 St William’s sites and redevelopment proposals for their sites, provide an excellent opportunity to assist LBN with significant housing delivery and employment growth and regeneration as well as addressing some of the key issues that they are facing across the borough. St William want to continue to work with LBN to ensure their development proposals are as closely aligned as possible with LBN’s key objectives whilst also ensuring that the new Local Plan can be as supportive in enabling development in the borough.

2 Vision and objectives

- 2.1 St William wholeheartedly supports the vision and objectives that is outlined within the Regulation 19 draft of the Local Plan Refresh and agrees that the vision for the transformation of Newham should be based on building a fairer, healthier and happier borough where creativity, diversity, an inclusive economy and community spirit can flourish and where residents feel proud of where they live.
- 2.2 St William previously made comments in relation to the key diagram on page 24, which previously incorrectly displayed the extent of the previously developed land on the former gasworks site in East Ham. The Regulation 19 draft of the Local Plan has updated this key diagram again which now doesn't show any previously developed land on this diagram. St William requests that the map is updated to ensure it is an accurate representation of this site particularly in light of its allocation in the Local Plan.

3 Building a Fairer Newham

- 3.1 St William continues to support the Local Plan's approach to building a fairer Newham, in particular through the delivery of at least 47,600 homes in Newham over the period 2019/20 to 2028/29 (paragraph 3.1) in line with the targets set in the London Plan (2021). The urgent need for housing delivery is confirmed in the Government's recent consultation on the NPPF, which outlines the Government's commitment to deliver economic growth by approving more housing and commercial development. The Government makes clear that the intention is to actually deliver the identified housing need and the consultation elevates the substantial weight that should be applied to the value of using suitable brownfield land. Building a fairer Newham and achieving the level of change and development proposed is based on Good Growth principles which is fully supported.

Policy BFN1: Spatial strategy

- 3.2 St William remains supportive of the spatial strategy outlined in Policy BFN1 which directs development to all of Newham's 17 neighbourhoods to distribute the benefits of growth (part 1) and to direct significant levels of growth to the six neighbourhoods in the Royal Docks and Beckton Riverside Opportunity Area (part 1 (a) (i)) as well as the N7 Three Mills neighbourhood, which forms part of the cross boundary Poplar Riverside Opportunity Area (part 1 (a) (ii)). We consider this to align with the spatial strategy set out in the adopted London Plan, which is welcomed.
- 3.3 St William note that part 1 (a) (i) refers to growth within the Royal Docks and Beckton Riverside Opportunity Area being unlocked by an extension to the DLR and the delivery of two new DLR stations. Whilst this is supported, the N17 Gallions Reach neighbourhood and associated site allocation for Beckton Riverside (N17.SA1) now acknowledges that this area will be transformed into a new neighbourhood either through the delivery of an extended DLR line and new DLR station or a similarly transformative (as confirmed by Transport for London) public transport intervention.
- 3.4 Whilst incremental change within neighbourhood N13 East Ham is supported in principle to enhance each neighbourhoods' character and the delivery of site allocations we provide further comments on this specific site allocation later on (part 1 (b)).
- 3.5 St William remains supportive of part 2 of this policy which seeks to ensure development will make the best use of land, optimise sites and deliver sustainable development by applying a design-led approach, supporting tall buildings in the designated Tall Building Zones and conserving the borough's heritage assets and settings is also supported and considered to align with the London Plan.
- 3.6 Part 4 of this policy refers to the creation of a new District Centre on N17.SA1 Beckton Riverside site allocation although it should be noted that Policy HS1 also refers to the potential for a new major centre at Beckton Riverside. St William considers that the quantity and scale of uses consistent with a 'District Centre' is more appropriate for the Site.

- 3.7 St William is fully supportive of delivering new open space and providing public access to open space on site allocations in line with the requirements of part 5 (e) and (f). However, with specific reference to site allocation N13.SA3 Former East Ham Gasworks site allocation it must be noted that both the creation of public access to the Metropolitan Open Land and the re-provision of playing pitches are dependent on the decontamination and remediation of the site and necessary enabling development. Further comments are provided on this to site allocation N13.SA3.

Policy BFN2: Co-designed masterplanning

- 3.8 Whilst the benefits of comprehensive masterplanning and development are acknowledged, St William remain concerned with the implementation of proposed Policy BFN2. Part 1 of this policy refers to piecemeal delivery which will be resisted particularly where it might prejudice the realisation of the relevant neighbourhood vision, policy, site allocation development or design principles or where the timing of delivery would be unsupported by infrastructure. It is not clear what is meant by piecemeal development in the context of this policy.
- 3.9 A number of strategic site allocations within the Local Plan and in particular almost all of St William's sites are subject to a wider site allocation within which there are multiple site ownerships i.e. site allocation N7.SA2 comprises of the TwelveTrees Park development site and the former Bromley by Bow Gasworks. TwelveTrees Park secured planning permission for development in 2018 and the Bromley by Bow Gasworks only just receiving resolution to grant for development. The same scenario applies to the Beckton Riverside (Gallions Reach) site allocation N17.SA1 which is subject to multiple land ownerships and owing to the size of the site and dependency on transformative transport measures such as the proposed DLR extension or other transport capacity improvements, it may not be possible to deliver the Site comprehensively and will inevitably be delivered over a long period of time. The policy as currently drafted would not offer the necessary policy support to enable these complex but vital strategic sites to come forward.
- 3.10 It is pertinent to note that an application has been approved for the TwelveTrees Park site, which is delivering the eastern parcel of the N7.SA2 allocation. Bromley by Bow Gasworks is located on the western parcel of the same site allocation and current has a resolution to grant planning permission. Both sites are subject to their own constraints, including the controls related to the sequencing of refurbishing the Gasholders at Bromley by Bow. In both cases the phasing is managed effectively by s106 obligations and planning conditions to provide a structured delivery programme with supporting infrastructure. In this context (where phased development has been approved) it is assumed that the policy would not be applied.
- 3.11 If it were, then the policy would serve to work against the delivery of development on these sites stifling housing delivery and the delivery of new jobs as well. It is considered that explicit clarification on the difference between phased delivery and piecemeal is required within the policy. To this end we do not consider this policy to be positively prepared, justified or effective and therefore does not meet the tests of soundness as set out in the NPPF. As noted in the Regulation 18 representations a more proportionate approach should be taken and resistance to piecemeal development removed. In these circumstances a masterplan (with associated Design Code), design led approach can still be followed, without precluding development coming forward at different times by different land owners.

- 3.12 All suggested amendments to the wording of proposed policies can be found at **Appendix 12**.
- 3.13 In line with the above comments, it may not be possible to achieve all of the requirements of part 2 of the draft policy because of site ownerships and other constraints. On this basis, it is not considered appropriate to have this as an explicit policy requirement. The site allocations themselves, the Local Plan design policies, as well as strategic policy documents such as OAPF's adequately ensure that masterplans and designs are co-ordinated; further to this, the need to ensure a site contributes to the wider context and neighbourhood can be secured via the planning application process and is not explicitly needed to be set out in the Local Plan.
- 3.14 St William remains supportive of the principle of activating vacant land through the use of meanwhile uses as set out in part 4 but previously noted that the nature of former gasworks sites, which are typically heavily contaminated, can prohibit the ability to activate and specifically provide public access to vacant or underused parts of these sites. This can include for health and safety reasons caused by the presence of contamination or the need to use vacant parts of the Site for other purposes such as storage of gasholders during the refurbishment process. Access to gasworks sites are also often in relatively isolated locations that require significant upfront investment to open them up for development, which would not be feasible for meanwhile use only. To that end, and as previously noted the requirement for a Meanwhile Use Strategy should have the ability to acknowledge site specific circumstances of sites.

Policy BFN4: Developer contributions and infrastructure delivery

- 3.15 Part 2 (a) requires sites that are not proposing to meet all s106 requirements on viability grounds to explore all available options to reduce the viability gap, this includes review mechanisms, with part (b) requiring an FVA to be submitted in the public domain. This approach is inconsistent with the London Plan where the requirement for a review mechanism (Policy H5) only relates to affordable housing and the Viability Tested Route (4.4.3 London Plan). National guidance recognises the wider role of review mechanisms but they should be applied proportionately and should not be applied where they would compromise the delivery of new development..
- 3.16 We previously stated that we did not have any particular comments on the priority order of the Plan's objectives set out in part 3 of Policy BFN4 but requested that the policy provides some scope to acknowledge individual site circumstances which may impact the ability to achieve the proposed order of priority for plan objectives. In the case of the Bromley by Bow Gasworks, for example, which contains seven no. Grade II listed gasholders (the only kind in the world) the proposals for the Site include the retention and reuse of these seven listed gasholders. The cost for both remediating the site and refurbishing the seven listed gasholders are significant abnormal costs that through the financial viability appraisal process has demonstrated to have quite significant and exceptional implications on the delivery of affordable housing on this site. Similarly, the unique nature of all of the gasworks sites means that they would all be subject to remediation in order to bring the site(s) forward for redevelopment which is subject to exceptional abnormal costs that need to be factored into the viability of the development and may influence the priority order set out in Policy BNF4.
- 3.17 Part 4 of this policy requires an Infrastructure Sufficiency Statement from applications for development at, or over, 250 units/hectare density or for major developments on site

allocations intended to demonstrate there is sufficient infrastructure. This is considered to be a duplication in requirements and it is considered that major applications already achieve this either through Environmental Impact Assessments or through standard application documents and proposal assessments i.e. the Transport Assessment. It is not clear what an Infrastructure Sufficiency Statement would seek to set out over and above a normal planning application assessment therefore this is not justified. This duplication of assessments provides no purpose and is contrary to the Government's aims of simplifying the planning process.

4 Design

- 4.1 As noted at Regulation 18 stage, St William places great emphasis on high quality design. We create bespoke masterplans which are designed in collaboration with local stakeholders and ensure each site is delivered with a design led approach responding to the individual opportunities and constraints that exist on each site. This approach and commitment to delivery high quality homes and sustainable places is demonstrated through St William's track record.
- 4.2 St William therefore agrees that the design process is a key aspect of delivering successful places and that this should be considered from the start of the development process.

Policy D1: Design standards

- 4.3 St William welcomes the updates made to Policy D1 in response to comments received to the Regulation 18 consultation draft. St William supports the principles outlined in Policy D1.
- 4.4 Supporting text to this policy (page 50) continues to make reference to securing the retention of architect, or architect oversight, to project completion. It is welcomed that this is no longer included within the policy itself however St William wishes to reiterate previous comments which raised concern with this requirement.
- 4.5 Whilst St William acknowledge the importance of maintaining design quality in a development, a requirement to retain the original architect through to completion is onerous and extends beyond the reach of planning. Sites in particular that are large or multi-phased are less likely to be able to adhere to this and an applicant should not be restricted in this regard.

Policy D2 Public realm net gain

- 4.6 St William supports the objectives of Policy D2 which is to ensure the delivery of high quality public realm and/or secure a public realm net gain. However, note that a number of comments made to the Regulation 18 draft have not been addressed. St William reiterates the following comments:
- Part 2 (d) strongly encourages major developments (in areas of deficiency of access to children's play space) to deliver part of their formal playspace requirements within the public realm, and/or provide additional formal or informal playspace in the public realm that is over and above the floorspace requirements set out in Local Plan Policy H11 and/or the site allocation – this requirement should very much be subject to site specific circumstances and only where there is opportunity to do so. The assessment of play provision within major developments must be considered fairly and against the actual requirements of planning policy rather than any requirement to go above and beyond policy requirements. In addition, play provision that is not within the public realm for example podium playspace provision within higher density development should not be prohibited because of this policy aspiration;
 - Part 3 outlines a requirement for all major developments to make a proportionate contribution towards public realm enhancement and maintenance beyond the site. As per previous comments, this must acknowledge that this contribution should be informed

by the financial viability of the Site and weighed in the balance of other contributions and public benefits being made. As set out in **Appendix 11**, brownfield sites and in particular former gasworks are subject to significant contamination and exceptional abnormal costs associated with their remediation, as acknowledged at footnote 59 of the London Plan and consequently any financial contributions sought from brownfield and gasworks developments must ensure they meet the relevant planning tests and have been factored into the viability of the development and considered in the round. A robust case in particular must be made for contributions to ongoing maintenance of the public realm beyond sites given the absence of ownership and control, including increasing costs associated with ongoing challenging economic conditions. St William consider that Community Infrastructure Levy should be used to cover future and maintainence costs of new public realm where this is being delivered as strategic/social infrastructure. Contributions should only be made by the developer to mitigate development impacts.

- 4.7 As currently drafted St William does not consider this policy to be justified and therefore fails to meet the tests of soundness in the NPPF.

Policy D4: Tall buildings

- 4.8 St William remains supportive of Policy D4 which sets out LBNs definition of a tall building (consistent with the London Plan), confirms the list of designated Tall Building Zones within the borough along with guidance on heights within each zone.
- 4.9 Whilst St William remain supportive of this policy, Part 2 continues to state that 'the height of tall buildings in any 'Tall Buildings Zone' should not exceed the respective limits set out in Table 1'. As per previous comments, St William considers this height restriction to conflict with the design led approach set out in Policy D3 of the London Plan and continues to request that this statement is removed. The Tall Building Zone heights should be there as guidance and should not preclude development that deviates from these heights if the proposed tall building has followed a design led approach (Policy D3 of the London Plan) and can be justified in design terms including townscape and visual impacts. The policy should incorporate sufficient flexibility to enable proposals to be considered on a case by case basis.
- 4.10 Table 1 sets out the proposed heights for the Tall Building Zones. St William provides comments on Tall Building Zone 5 Gallions Reach (which applies to the Beckton Riverside site allocation) and Tall Building Zone 15 West Ham Station (which applies to the Bromley by Bow gasworks site or the TwelveTrees Park and Former Bromley by Bow Gasworks site allocation) within the table below:

Table 4.1: Tall Building Zone Comments

Neighbourhood	Site Allocation	Height Range Maximum	Further guidance	St William comments
TBZ5: Gallions Reach				
N17 Gallions Reach	N17.SA1 Beckton Riverside	32m (c. 10 storeys) and 40m (c. 13 storeys) and 50m (c. 16 storeys) in the defined areas.	<ul style="list-style-type: none"> - Prevailing heights should be between 21m and 32m (c.7-10 storeys) - Opportunity to include tall building elements up to 40m (c. 13 storeys) in limited locations in proximity to Gallions Reach DLR station and the riverside to mark the neighbourhood parade, and 50m (c. 16 storeys) in limited location in the proximity of the new town centre and DLR station. - Development should be mindful of height transitions when delivering higher densities and/or industrial intensification through stacked industrial typology. 	<ul style="list-style-type: none"> - Whilst St William welcomes the increase in heights from the Draft Regulation 18 Local Plan, the proposed maximum heights do not reflect the Site's location within an opportunity area, an area that is not adjacent to other residential uses; the Site's frontage to the river or the exceptional circumstances of this former gasworks site and the associated abnormal costs involved with remediating the Site. - The height range maximum should be between 50 m and 80 m (17-27 storeys). - Prevailing heights should be between 30 m and 50 m (10-20 storeys). - Opportunity for tall building elements should not be limited to the riverside or new or existing stations. - Building heights are constrained and limited by CAA height restrictions.
TBZ15: West Ham Station				
N7 Three Mills	N7.SA2 Twelvvetrees Park and Former Bromley by Bow Gasworks	50m (c. 16 storeys) and 32m (c. 10 storeys) and 100m (c. 33 storeys) in the defined areas.	<ul style="list-style-type: none"> - Prevailing heights should be between 21m and 32m (c. 7-10 storeys), except in the immediate context of the listed gasholders where heights should be between 9m and 21m (c. 3-7 storeys). - In the immediate context of the listed gasholders, opportunity to include limited tall building elements of up to 32m (c. 10 storeys). - Along the railway line and Bow Creek (River Lea) and to mark West Ham station, opportunity to include limited tall building elements of up to 100m (c. 33 storeys), which are sufficiently 	<ul style="list-style-type: none"> - Heights of the consented buildings at the Twelvvetrees Park development (and the resolution to grant for the Bromley by Bow proposals) exceed the height thresholds outlined in this Tall Building Zone. - Prevailing heights of between 21m and 32m (7-10 storeys) is not reflective of what has been consented and should be increased to between 30m and 60 m (10-20 storeys).

Neighbourhood	Site Allocation	Height Range Maximum	Further guidance	St William comments
			<p>spaced to allow for views and space around the listed gasholders.</p> <ul style="list-style-type: none"> - In the rest of the Tall Building Zone, opportunity to include limited tall building elements of up to 50m (c. 16 storeys). - Height, scale and massing of development proposals should be assessed to conserve and enhance the character of heritage assets without detracting from important landmarks and key views set in the Three Mills conservation area appraisal and management guidelines. - All taller buildings should be integrated carefully to aid wayfinding and mark special locations. - Careful consideration is required for the location of tall buildings, particularly along the waterways to avoid overshadowing impact on watercourses. 	<ul style="list-style-type: none"> - Heights should not be prescribed for buildings within the vicinity of the gasholders as they will be determined via a design and heritage led approach and through a thorough townscape and visual impact assessment. - Whilst it is welcomed that there is support for limited tall building elements of up to 110m this should not be restricted to along the railway line, Bow Creek (the River Lea) and West Ham station as there may be a need for other landmark buildings within the Site given the size of the Site. - Proposed amendments to the wording of this table and proposed heights can be found in Appendix 12.
TBZ18: Stratford High Street				
N7 Three Mills and N8 Stratford and Maryland	<p>N7.SA3 Sugar House Island</p> <p>N8.SA3 Greater Carpenters District</p> <p>N8.SA4 Stratford High Street Bingo Hall</p>	<p>50m (c. 16 storeys) and 100m (c. 33 storeys),</p> <p>60m (c. 20 storeys), 40m (c. 13 storeys) and 32m (c. 10 storeys) in the defined areas.</p>	<ul style="list-style-type: none"> - Prevailing heights between 21m and 32m (c. 7-10 storeys), except at the sensitive edges of the tall building zone, where prevailing heights should be between 9m and 21m (c. 3-7 storeys). - Opportunity to include limited tall building elements of up to 50m (c. 16 storeys) and 100m (cc. 33 storeys), 60m (c. 20 storeys), 40m (c. 13 storeys) and 32m (c. 10 storeys) in the defined areas. - Tall elements in the 32m area and/or in close proximity to the conservation areas should be limited in number. - Tall buildings in immediate proximity to the conservation area and other designated heritage assets should address and respond to 	<ul style="list-style-type: none"> - Prevailing heights should be between 30m and 60 m (10-20 storeys). - Assessment of townscape and visual impact does not need to be referenced specifically within this tall building zone as it should apply to all (tall) buildings and referenced more generally rather than specifically for this site allocation.

Neighbour- hood	Site Allocation	Height Range Maximum	Further guidance	St William comments
	N8.SA7 Rick Roberts Way N8.SA8 Bridgewater Road N8.SA9 Pudding Mill		<p>their scale, grain and significance as well as the wider streetscape and local character.</p> <ul style="list-style-type: none"> - Tall buildings should conserve the character of the area without harming the significance of heritage assets or detracting from important landmarks and key views, including views set in Stratford St John's conservation area appraisal and management plan and Sugar House Land conservation appraisal and management plan. - Development including tall buildings in this zone should assess their visual and townscape impact in the context of existing and permitted tall buildings to ensure the cumulative impact does not saturate the skyline. - Careful consideration is required for the location of tall buildings, particularly south of the waterways to avoid overshadowing impact on watercourses. 	

- 4.11 Table 1 of Policy D4 should be updated to include site allocation N13.SA3 Former East Ham Gasworks within the East Ham Tall Building Zone (TBZ3) owing to the scale of the existing gasholder on site which extends to circa 52m AOD in height (equivalent to 16 storeys). The Council's Characterisation Study (December 2024) has omitted the existing tall building on site (page 168) and unlike the other gasworks in the Borough, is subject to limited reference within the study.
- 4.12 As a general comment, the tall building policy (Policy D4) should make clear that tall buildings are expected to follow the design led approach in line with Policy D3 of the London Plan. As currently drafted Policy D4 is not considered to be positively prepared or justified on the basis that it doesn't align itself with the consented and proposed heights on various site allocations that have been subject to extensive design scrutiny and development. The policy as currently drafted is not considered to meet the tests of soundness set out in the NPPF.

5 High Streets

- 5.1 St William continues to support LBNs objective of ensuring its network of town centres can evolve and thrive and continue to meet the shopping, social, leisure and civic participation needs of Newham's growing population.

Policy HS1: Newham's Town Centres Network

- 5.2 Part 3 (b) requires a minimum of 20 non-residential units within local centres (with the majority of units between 80 sqm and 150 sqm GIA each). As stated previously, it is considered that flexibility is needed, particularly in the current retail market, to avoid risk of commercial units sitting vacant long-term. The appropriate scale for new local centres should be informed by floorspace need and commercial demand, including existing and proposed housing within its catchment. We have suggested amendments to the wording of this policy in **Appendix 12**.
- 5.3 Part 4 of draft Policy HS1 discusses the requirements for development within neighbourhood parades and part c) outlines a requirement for the provision of a small food store (of more than 300 sqm GIA) to be subject to passing a retail impact assessment. Part d) goes on to require a retail impact assessment for any proposal resulting in 1,000 sqm GIA or more cumulative floorspace in main town centre uses. The policy as currently drafted therefore sets out two different retail impact assessment thresholds which is confusing and unclear.

6 Social infrastructure

Policy SI2: New and re-provided community facilities and healthcare facilities

- 6.1 St William acknowledges the role of community and health facilities in supporting new neighbourhoods. Planning for new facilities is complex and town centre sites will not always be the most appropriate location to meet community demands. St William therefore does not support the requirement for a sequential test for new community facilities and would welcome greater clarity in the policy wording to ensure it is clear that the sequential test is only triggered as required under the National Planning Policy Framework and that there is no wider remit for the sequential test in connection with community facilities.

Policy SI4: Education and childcare facilities

- 6.2 St William welcomes the adjustment to this policy which now acknowledges that the delivery of new schools and childcare facilities on identified site allocations should be of the scale required to meet projected need for school places. Education and childcare facilities need is complex and must take into account any spare capacity of existing education and childcare facilities so as not to undermine the viability of existing provision. St William acknowledges that pupil projections are likely to be a range and that flexibility to expand schools or childcare settings is beneficial – however the scope of this does need to be limited taking into account need from the relevant development and site-specific characteristics. St William does not support any requirement to safeguard land in key locations (such as a high street setting) where need is uncertain and impacts on placemaking would be detrimental over the medium to long term. All safeguarding should be evidence based and not precautionary, with clear triggers for removal of that safeguarding when appropriate.
- 6.3 St William acknowledges that higher education and early years education are important to the wellbeing of residents and the strength of the economy. However policy needs to recognise the mixed market of providers in those spaces, the mixture of funding mechanisms they rely on, and the large and flexible catchment areas over which they operate. Early years provision is mostly delivered by the private sector and is not limited to people who live within a certain area. Higher education is delivered and funded at a strategic scale and may serve pupils who travel long distances for a particular specialism. In this context, both the limitations of, and lawfulness of, requiring developers to contribute to this type of provision need to be carefully considered. For the majority of sites, provision of financial obligations for these purposes will not be appropriate and will not constitute site specific mitigation. St William would like to ensure any supporting documents to the Local Plan (e.g. those relating to Planning Obligations) reflect this. Provision of this infrastructure may be an appropriate use of CIL revenue.
- 6.4 Proposed amendments to the wording of this policy can be found at **Appendix 12**.

7 Inclusive Economy

- 7.1 St William continues to support LBNS overarching approach to their economic future through Community Wealth Building and will continue to support its intention to building a fair economy which secures social, economic and environmental benefits for all.

Policy J1 Employment and growth

- 7.2 St William remain concerned that Table 6 within Policy J1 which sets out the priority uses for the Strategic Industrial Locations within the borough (including Beckton Riverside (SIL 5)) continues to state within the functional requirements that no residential floorspace will be permitted in these designations. Whilst supportive in principle of the priority uses identified for SIL 5: Beckton Riverside, the Beckton Riverside area is proposed to be transformed through residential led mixed use development into a new neighbourhood as set out in site allocation N17.SA1.
- 7.3 St William therefore maintain that it would be too prohibitive or restrictive to fully preclude residential uses from SIL5 should the opportunity arise to intensify the SIL or enable co-location of residential and industrial uses through design in this SIL. St William have therefore suggested again that the restriction on residential floorspace in this location is removed.

8 Homes

- 8.1 St William notes that LBN has the second highest housing target in London with a requirement to deliver 32,800 new homes over a ten year period as set out in the adopted London Plan (2021). The Government's recent consultation on the NPPF proposes to increase the annual housing target from 300,000 homes per annum to at least 370,000 homes per annum, specifically recognising that London has fallen behind in meeting its housing needs. Whilst the outcome of the proposed revised method published as part of the NPPF consultation reduces LBN's annual housing target from 4,188 to 2,178 homes per annum there remains strong housing need across the capital. Local planning authorities in London, however, do not use the Government's standard method and instead use the London Plan targets which have increased from 52,000 to 80,000. The duty to cooperate objective in the London Plan will therefore see the Greater London Authority recalibrate the distribution of the 80,000 homes and it is assumed that LBN's housing requirement will be 2,752 homes per annum, a further 574 homes when compared to the standard methodology figure.
- 8.2 Delivery rates in the borough have been low – over the last five years only once meeting its target. In total over these five years LBN have only met 71% of its housing target for that period.
- 8.3 The Site Allocation and Housing Trajectory Methodology Note (July 2024) which has been published as part of the evidence base to the emerging Local Plan confirms that LBN only has a five year land supply of 2.14 years (paragraph 4.7.2) further emphasising the urgent need for new homes across the borough.
- 8.4 Section 4.7 of the Site Allocation and Housing Trajectory Methodology Note goes on to confirm that LBN 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 16,472 units. The Note also states that *"it is important to note that our inability to meet our London Plan housing target is not because the borough lacks available sites to deliver homes. Instead, the shortfall of delivery against our London Plan target stems from delays to the delivery of allocated sites within our adopted Local Plan"*.
- 8.5 Regardless of the specific housing target that may be attributed to LBN once the new standard method is introduced, it is clear that there is an acute need for housing in LBN both in terms of the number of homes needed but also in terms of meeting local need. St William considers that all of their sites, which are strategic sites within the adopted and emerging Local Plan, provide a significant opportunity in assisting Newham with meeting this substantial housing shortfall as well as delivering housing in the borough that will meet local housing need.
- 8.6 Gasworks sites fall within the broader category of 'surplus utility sites within the adopted London Plan and are identified as one of the six strategic sources of housing (Policy H1). Policy H1 of the London Plan is about increasing housing supply and requires boroughs to optimise the potential for housing delivery on all suitable and available brownfield sites including specifically the six strategic sources of housing. The Mayor's commitment to promoting gas holder sites for housing, is reflected in the approach to remove them from policy objectives set out within economic policies and in particular through the application of the lower Fast Track threshold of 35% affordable housing (instead of 50%) where it can be demonstrated

that a gasworks site is subject to extraordinary remediation, enabling and remediation costs (Footnote 59).

- 8.7 The Sites therefore represent a unique opportunity in the borough to deliver much needed housing on site's located within key growth areas, that are accessible and that have been identified for transformation and that are able to support the creation of new neighbourhoods in the borough in line with the 15 minute city concept. Furthermore, these developments have the potential to deliver a series of environmental, social and economic benefits for local residents and workers including making a positive contribution to LBNs residents' health and wellbeing.

Policy H1 Meeting housing needs

- 8.8 As noted above, there is an acute need for housing in the Borough and LBN plays a strategic role in the delivery of housing within London. St William therefore continues to support the approach outlined in Policy H1 which seeks to enable a net increase of between 51,425 and 53,784 quality homes between 2023 and 2038 by delivering the majority of new housing on site allocations, ensuring developments follow a design-led approach to optimise site capacity.

Policy H3 Affordable housing (and Policy H5 Build to Rent housing)

- 8.9 St William notes that LBN have proposed a significant change to its affordable housing requirements which are set out in Policy H3. There are two key changes from the Regulation 18 consultation draft:
- 1) greater emphasis or priority given to social rent homes and
 - 2) a new requirements 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.
- 8.10 The policy notes that developments that do not meet these requirements and the delivery of the required level of family dwellinghouses (C3) under draft Local Plan Policy H4.2 will not be supported unless accompanied by a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. Furthermore, reference to the fast track route (or threshold approach as set out in the London Plan has been removed from this policy.
- 8.11 Whilst St William acknowledges the greater emphasis on the provision of social rent homes and acknowledges that this is in line with recent proposed amendments to the NPPF, the policy as now proposed does not align with London Plan Policy H5 'Threshold approach to applications', Footnote 59 nor is it supported by a robust viability evidence base o. As part of the evidence base to support the Regulation 19 Local Plan, BNPP have prepared a Local Plan Viability Assessment (April 2024), this 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 a number of sites are not viable at lower percentages once other policy requirements are included. This evidences that the 60% target is not viable or deliverable, 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.

- 8.12 This was also raised by Officers at Newham's Cabinet Meeting (4th June 2024). The Officers Report to Cabinet Plan for Newham states in paragraph 3.5 "*The affordable housing policy changes made following the Full Council motion in December 2023 may cause deliverability challenges for the Local Plan due to the impact on the Plan viability.*"
- 8.13 Viability challenges will have a significant impact on delivery, which are already at a low level. Further challenges will only exacerbate the existing low deliverability rates, resulting in even fewer affordable homes. In London, over the 2019/23 period, in 2023/24 total housing starts were 39% against the average starts over this five year period, and affordable housing starts were 42% against the average starts over this five year period. In Newham, total housing starts in 2023/24 were 27% against the average, and affordable housing starts were 40% against the average. This data from the GLA clearly illustrates that housebuilders are struggling to meet the 35% affordable housing threshold.
- 8.14 The approach set out by LBN is inconsistent with the London Plan where a lower threshold is set to incentivise developers to come forward. Whilst it is acknowledged that there remains an aspiration to deliver 60% affordable housing and this can be a target, a lower fast track threshold of 35% should be included to ensure consistency with the London Plan and incentivise sites to come forward with certainty on the affordable housing offer, avoiding the need for detailed negotiations on viability. The acute need for affordable housing in LBN has to be balanced with the need to deliver other social infrastructure in addition to a realistic understanding of what development can deliver in the current market, and a policy approach that does not compromise sustainable development. With the target set too high limited sites will not come forward given the significant viability constraints, and having to progress through the viability tested route will create further uncertainty, detract investment into the Borough and delays to the process. Development brings forward a significant expanse of public benefit beyond affordable housing, such as open space and jobs; policy that thwarts development will leave these benefits unrealised.
- 8.15 Policy H5 of the London Plan sets a lower minimum requirement of 35% affordable housing or 50% for public sector land and industrial locations (with the exception of gasholder sites) as the threshold for the Fast Track Route where a financial viability appraisal is not required as long as the above threshold is met or exceeded, the proposed tenure split is consistent with the tenure split outlined in Policy H6 of the London Plan and other relevant policy requirements and obligations have been met.
- 8.16 The proposed tenure mix set out by LBN seeks to provide 50% social rent and 10% intermediate, this is supported by a Strategic Housing Market Assessment evidencing current housing needs in the borough. Whilst it is accepted that there is a need to deliver more social housing across London, the requirement for 50% social rent is not viable or deliverable, as evidenced in the Council's own viability study.
- 8.17 The tenure mix therefore needs to be adjusted to take into account a reduced overall target, as an example where a 35% threshold is applied, using the same proportion of social rent / intermediate (83/17), this would equate to 29% social rent and 6% intermediate. Whilst the

aspiration for 50% social rent can remain, a lower threshold needs to be set to ensure schemes can progress through the fast track route, to ensure consistency with the London Plan.

- 8.18 The Regulation 19 Local Plan seeks to provide the same affordable housing target and tenure mix for sale and build to rent homes. This approach is inconsistent with the London Plan Policy H11 which states that the affordable housing offer can be solely Discount Market Rent (DMR) Part C of London Plan Policy H11 states that the Mayor expects at least 30% DMR homes to be provided at an equivalent rent to London Living Rent with the remaining 70% at a range of affordable rents. Footnote 68 states that boroughs may wish to publish guidance setting out the proportion of DMR homes to be provided at different rental levels to benefit from the Fast Track Route. In setting local DMR requirements boroughs should have regard to the relationship between the level of discount required and the viability of achieving the relevant threshold level. The Regulation 19 Local Plan and supporting viability study has not tested the viability impacts and has instead adopted a blanket approach, this fails to highlight the distinct financial differences between a for sale and build to rent scheme, which is inconsistent with national and regional policy. Where affordable housing target and tenure types are the same there is incentive for a developer to come forward with a build to rent scheme, given the clawback/covenant restrictions.
- 8.19 The London Plan in particular acknowledges the strategic role of gasworks sites in the delivery of housing but also for the exceptional abnormal costs associated with bringing forward these sites for development. Footnote 59 of the London Plan applies the 35% Fast Track threshold to former utility sites instead of the 50% threshold that would be applied if these sites were treated as industrial sites and not acknowledged for their unique characteristics.
- 8.20 LBN's Local Plan Viability Assessment (Regulation 19) 2024 evidence base document (and draft Policy H3 of the Regulation 19 Local Plan) fails to acknowledge the exceptional abnormal costs associated with gasworks sites. Paragraph 4.39 of the Local Plan Viability Study states that exceptional costs have not been included, for formal gasworks as evidenced at Bromley by Bow these costs are significant, 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.
- 8.21 We have genuine concerns regarding LBNs Local Plan Viability Assessment. It does not consider the Bromley by Bow site and it is unclear why this has been excluded. It is a strategic site, presents the opportunity for a significant number of homes and jobs and is an allocated site for the borough. NPPG suggests that these are very much the sites that should be assessed. We are also concerned about the credibility of the inputs, and outputs derived from the whole plan viability assessment. 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 added on. It is an omission to exclude taller buildings. It is also unrealistic for buildings to be built with a psf rate of less than £300psf (taking account of all additional policy requirements). This is not reflective of current 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. For the Bromley By Bow site, a Financial Viability Appraisal has been undertaken, assessed

by the same authors as the Local Plan Viability Assessment. This concludes 10% affordable housing for the site, fundamentally a different output to the Local Plan Assessment. There is no obvious explanation for this, which gives rise to a real concern that the Local Plan and 'real world' Financial Viability Appraisal are markedly different. They shouldn't be. The assumptions borne out of the Local Plan Assessment would appear to be inconsistent with the evidence provided in support of actual development proposals and therefore not sound. These need to be considered for specific sites that has been tested.

- 8.22 St William's former gasworks sites in particular are subject to a series of significant site constraints unique to these sites; including seven listed gas holder structures at Bromley by Bow, the only kind in the world; underground utilities cables and easements at Bromley by Bow and Stratford; designated and/or proposed SINC and Metropolitan Open Land at Bromley by Bow, Beckton Riverside and East Ham; TPO's; requirements for significant social infrastructure at Beckton Riverside; river frontage and associated flood and river wall and defences and safeguarded land and London City Airport height restrictions at Beckton Riverside. In all instances, significant remediation including the removal of existing or remnant gas infrastructure is required to enable these sites to come forward for development. These significant site constraints and associated exceptional abnormal costs must be balanced carefully when considering the quantum of affordable housing that could be delivered on these Sites as well as the requirement to meet all other planning policy objectives and whilst enabling development to come forward.
- 8.23 On that basis, St William requests that draft Policy H3 is updated to align with London Plan Policy H5, reintroducing reference to the threshold approach and reintroducing a strategic target of 50% affordable housing making clear that that is a strategic target only and that in order to meet the Fast Track threshold the provision of 35% affordable housing is required (aside from industrial sites and public sector land in accordance with Footnote 59 of the London Plan). This update should take place in line with a review of the Local Plan Viability Assessment (Regulation 19) 2024 evidence base document to ensure the policy is supported by a robust evidence base that adequately acknowledges the exceptional abnormal costs as well as the correct quantum of development envisaged for each development site.
- 8.24 As currently drafted, Policy H3 (and the same requirements within Policy H5) are not considered to be effective, justified or positively prepared and therefore fail to meet the tests of soundness within the NPPF and we consider that this has the potential to deter sites from coming forward.
- 8.25 Policy H5 Part C requires units within Build to Rent developments to be held as Built to Rent under a covenant for at least 15-years. The Renters Rights Bill proposes to make provision the changing the law about rented homes, including provision abolishing fixed term assured tenancies and assured shorthold tenancies; and imposing obligations on landlords. This Bill is considered to suitably support tenants to ensure they are protected and it is therefore considered that Policy H5 Part C should be removed.

Policy H4 Housing mix

- 8.26 St William recognises the general approach to housing mix which aims to deliver a mix and balance of residential types and sizes with the intention of securing mixed and inclusive communities, informed by housing need set out in Newham's latest Strategic Housing Market

Assessment; development viability; the existing and pipeline mix of residential units in the area and importantly the individual circumstances of the site. This general approach to housing mix is considered to be positively prepared, justified, effective and consistent with national policy therefore meeting all tests of soundness set out in the NPPF.

- 8.27 However, to reiterate comments provided to the Regulation 18 consultation draft of the Local Plan, St William considers Parts 2, 3, 4 and 5 of this draft policy to go against the overarching objective of creating mixed and inclusive communities by prescribing and limiting the quantum of unit sizes. The need to deliver more family homes is recognised, but policy should only ascribe quanta to affordable homes in respect of the mix.
- 8.28 The requirement for 40% of homes to be delivered as family sized homes (3 bedrooms or more) and a minimum of 5% to be provided as four or more bed affordable homes as noted previously is particularly onerous and we previously requested that the wording of this policy is revised to instead seek to maximise the provision of family sized homes (in particular the 4 bed homes). It is understood that there is a need for family homes in the borough however this requirement should not serve to delay or hinder the delivery of much needed homes across the borough and further flexibility should be incorporated into this policy to be considered sound.
- 8.29 As previously noted 2 bedroom 4 person homes play an important role in meeting family housing need both in terms of being able to provide sufficient space for a young family but also by being more affordable. Furthermore, it is noted that Newham has one of the youngest populations in London with an average age of 32.7 years old (paragraph 1.5). The delivery of a higher proportion of smaller sized units would assist in meeting local housing need as well as helping to create a mixed and inclusive community. As previously set out we request that further flexibility is incorporated into this policy by removing the maximum caps on one bedroom, two person homes and studios. This is an approach that the London Borough of Tower Hamlets are taking in their emerging Local Plan which in particular seeks to offer the greatest flexibility on unit mix for private home provision and an approach that also aligns with London Plan (Policy H10) which enables the proposed housing mix to be considered on a case-by-case basis and genuinely reflect local housing need.
- 8.30 It is recognised there is an overarching need to deliver family social rented homes within the borough and the policy target of 40% should remain for this tenure type. This aligns with the London Plan Policy H10 Part B where the low cost rent size of units is evidenced by borough needs. However, it is not appropriate to set bedroom mix targets for market or intermediate housing and this is inconsistent with Policy H10. The intermediate and market housing mix should be informed by local demand and provided in suitable locations. The London Plan recognises that well designed one and two bedroom homes in suitable locations can attract those wanting to downsize from their existing homes, freeing up existing family stock (London Plan Policy H10 Part 9). There is no policy support for delivering market homes which do not reflect market demand.
- 8.31 As currently drafted, overall draft Policy H4 is not considered to be justified or effective and therefore does not meet the tests of soundness set out in the NPPF.
- 8.32 St William's suggested amendments to the wording of this policy are set out in **Appendix 12**. It is only with these amendments that this policy could be considered sound.

Policy H8: Purpose Built Student Accommodation

- 8.33 St William supports the acknowledgement of need for student housing in certain locations in the Borough. The London Plan sets an overall strategic requirement for PBSA of 3,500 bed spaces across London per year. Moreover, there are strong academic clusters in the Borough, and on the edge of its boundaries.
- 8.34 The London Plan (Policy H15) encourages the development of student housing in locations that are well-connected to local services by public transport and active travel, particularly in mixed-use regeneration and redevelopment schemes.
- 8.35 Part 2 of Policy H8 sets out the criteria for student accommodation in all other neighbourhoods outside Stratford and Maryland seeking to focus new student accommodation within or adjacent to an existing campus development or in a town or local centre location well connected by public transport. St William request that this part of the policy is updated to also consider locations in close proximity to town centres suitable as well. Sites immediately adjacent to town or local centres can equally benefit from high levels of public accessibility and should not be precluded.

Policy H11 Housing design quality

- 8.36 St William continues to support the principle of delivering high quality housing design. This approach aligns with St William's own objectives to deliver high quality homes that strengthen communities and improve people's lives.
- 8.37 A design-led approach as a means of optimising site capacity (as set out in draft Policy D3 and Policy D3 of the London Plan) is dependent on delivering high quality developments and homes and this policy is supported.
- 8.38 As currently drafted, Policy H11 provides relatively detailed guidance and it is on that basis that St William have a number of specific comments to make in line with their previous comments:
- Part 2 (d) requires new housing to be designed to avoid single-aspect dwellinghouses, particularly where north facing. Whilst the benefit of dual aspect homes are recognised, in design terms this is often not possible due to site-specific restraints and viability issues and therefore policy should be re-worded to encourage dual-aspect homes, where feasible. In addition updated building regularions have addressed some of the concerns related to ventilation and overheating in single aspect homes. Therefore where it can be demonstrated that single aspect accommodation can be designed to give high quality accommodation and improving the efficiency of buildings therefore reducing cost, and being able to deliver more homes (including affordable homes) they should not be limited.
 - Part 2 (e) requires ground floor private amenity spaces to be located away from street-facing facades. By virtue of the fact that LBN is urban in nature and most if not all development sites are subject to a number of site constraints, it is not considered that this policy objective can always be achieved. St William suggests that this part of the

policy is re-worded to encourage private amenity spaces to be located away from street facing facades, where feasible.

- Part 4 requires development that is referable to the Mayor to design a proportion of social rent rooms in accordance with the recommendations of LBNs forthcoming 'Housing design needs study' guidance. St William is not aware of and has not seen this guidance that is referenced and therefore is unable to comment as the contents of this guidance is not known. This approach is therefore not considered to be positively prepared, justified or effective and therefore fails to meet the tests of soundness in the NPPF. This part of the policy should be removed.
- Part 5 seeks to ensure major residential developments incorporate shared amenity spaces that foster social interaction and a sense of community, which is supported. External communal amenity spaces are expected to provide 50 sqm for the first ten units or private rooms and 1 sqm for each additional unit or private room. Whilst St William always seek to maximise their open space and communal amenity space provision, site specific circumstances and constraints can sometimes preclude standards from being met and in those instances communal amenity provision must be considered in the round, in the context of other amenity space being delivered on site as well as the overall quality of the development and public benefits being delivered. St William have suggested some adjustments to the wording of this policy in **Appendix 12**.

9 Green and water spaces

- 9.1 St William continues to support the principle of the Local Plan's approach to green and water spaces in the borough, recognising the importance of these spaces in providing a significant range of benefits including enhancing the health and wellbeing of people living in the borough, supporting LBNs economy by making the borough an attractive place to live and work and helping to address the twin challenges of the climate change and biodiversity emergencies.

Policy GWS1 Green spaces

- 9.2 As noted in the Regulation 18 representations, St William is committed to supporting LBN in delivering easy access to a network of high-quality green spaces. Their sites at Bromley by Bow, TwelveTrees Park, Beckton Riverside, East Ham and Rick Roberts Way represent a significant opportunity to deliver and provide access to new high quality green space with these sites having been inaccessible to the public for many years.
- 9.3 In relation to GWS1 Part 1 (b), which requires the open character of Metropolitan Open Land (MOL) to be maintained, please refer to our comments on site allocation N13.SA3 Former East Ham Gasworks which provides an assessment of the Former East Ham Gasworks against MOL criteria and concludes that it doesn't meet all of the tests.
- 9.4 In the same vein, 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.
- 9.5 Part 4 (d) of the draft policy requires biodiversity to be maximised, delivering a minimum of 10% biodiversity net gain in a way that is particular to the local need and environmental character. St William considers that the biodiversity net gain requirements should be fully in line with relevant legislation which doesn't specify local need. It is therefore not considered necessary to refer to meeting local need and environmental character.
- 9.6 St William maintain their previous comments in relation to Part 5 of this policy and the requirement for new open space to either be transferred into the Council's ownership and a commuted sum to be paid, to cover the cost of maintenance over a period of 15-years (secured through a legal agreement) or the provision of a Management Plan for new open space that isn't adopted. This policy should make clear that there are two options available for the management and maintenance of new open space rather than the presumption being that new open space will automatically transfer to Council ownership. Management Plans should also not be restricted to being secured through a legal agreement and in some instances it may be appropriate to secure such a plan via planning condition.

Policy GWS3 Biodiversity, urban greening and access to nature

- 9.7 St William continues to support the principle of the requirement for development to contribute to nature recovery in the Borough by protecting and enhancing biodiversity (green and water).
- 9.8 However, in line with previous comments and in relation to GWS3 Part 1(a) it should be noted that replacing lost features within the development site may not always be possible particularly in the case of former gasworks sites which must be fully remediated to enable their redevelopment and make them safe for public access. The proposals at Beckton Riverside, and the Bromley by Bow former gasworks, which secured resolution to grant in June 2024 is an example of this where the existing SINC and ecology must be removed to facilitate remediation of the Site. St William remain committed to enhancing and improving biodiversity value on-site however where there is such a loss through the remediation process this can be challenging and alternative off-site options must be considered. Whilst the delivery of on-site biodiversity enhancements should be prioritised, policy wording must also recognise that in some instances, off-site mitigation and compensation is necessary on many brownfield sites, in line with the hierarchy.
- 9.9 Part 3 requires new or improved green or water spaces in areas deficient in access to nature to have intrinsic nature conservation value that would qualify as a Borough Site of Importance for Nature Conservation. St William consider this requirement to be too onerous and not aligned with any relevant regional or national policy.
- 9.10 Part 4 of the policy sets out the requirements for Biodiversity Net Gain (10%) and the requirement for this to be on-site and where that is not possible off-site within the Borough before considering out of borough. It states that out of borough sites will only be considered where it can be demonstrated that there are insufficient sites and credit schemes in the Borough to deliver the required net gain. Whilst St William are supportive of the principles outlined in this policy, the approach relies upon a thorough stock take of available and potential off-site habitats (for off-setting) within the borough to ensure they are of suitable characteristics to accommodate the BNG provision. St William has suggested that the wording of this policy is revised to remove reference to 'insufficient sites' so that the focus can be on credit schemes.
- 9.11 Part 7 of this policy relates to the Epping Forest Special Area of Conservation and its protection and enhancement. Part 7b refers to contributions for the provision of Suitable Alternative Natural Greenspace and does not mention on-site measures that have the potential to reduce requirements. As currently drafted this suggests that both contributions and on-site reduction measures are required however it should be reasonable to assume this one or the other should be sufficient.
- 9.12 Overall, St William considers this policy to not be effectively prepared and therefore failing to meet the tests of soundness set out in the NPPF.

10 Climate emergency

Policy CE2 Zero carbon development

- 10.1 St William recognises the importance of reducing carbon emissions to minimise climate change and have adapted their business to go beyond Government requirements by compiling a zero carbon transition plan for each new development to enable the homes to operate at net zero carbon by 2030. St William therefore remains supportive of the Council's intentions to ensure Local Plan policy plays a role in mitigating and adapting to climate change and maximising environmental benefits.
- 10.2 Notwithstanding this overall position, in their representations to the Regulation 18 draft of the Local Plan, St William commented that climate change policies should be outcome focussed and that energy policies that are too detailed can limit freedom to deliver the most suitable and effective long term carbon/sustainable and design strategies for a site.
- 10.3 With reference to draft Policy CE2, Part 1 and 3 set targets for space heating demand and energy use intensity which is contrary to what is set out in the 13/12/2023 Ministerial Statement which states *'Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations'*. The incorporation of these specific standards is therefore at odds with Government guidance nor positively prepared, justified or effective and therefore not considered to meet all tests of soundness set out in the NPPF. It is on this basis that we are aware that other planning authorities have had to remove similar prescriptive policies prior to their adoption.
- 10.4 St William also have some concern with the method outlined at Part 4 which relates to onsite renewable energy and overcomplicates the process for capturing off-site renewable energy generation. St William considers that it would be more appropriate to maintain a standard tariff based approach that aligns with regional planning policy.

Policy CE3 Embodied carbon

- 10.5 In relation to embodied carbon, Part 6 of the draft policy outlines an expectation for major developments to meet embodied carbon limits of less than 500kg CO₂/m². St William notes that this aligns with the aspirational WLC benchmark within the GLA Guidance, as opposed to the standard benchmark (which is 850kg CO₂/m²). Achieving the aspirational benchmark is extremely challenging and rarely seen from developments. St William therefore requests that Part 6 is updated to require the standard benchmark or align itself with GLA Guidance and acknowledge that it is aspirational.
- 10.6 Every development and its site-specific solution to climate change and environmental sustainability will differ, therefore St William's preference is for the prescriptive requirements of these policies in particular Policy CE2 and CE3 are removed or more flexibility incorporated into this policy which ensures the optimum reduction in carbon emissions is reached whilst taking account of site specific circumstances and viability.

11 Transport

- 11.1 St William agrees that high quality, sustainable transport is key to delivering many of Newham's objectives and wishes to support LBN where they can in ensuring all of their development sites deliver and encourage methods of high quality, sustainable transport.
- 11.2 At a strategic level St William remains supportive of new strategic transport projects and agree that new strategic transport has the potential to unlock significant development opportunity that can deliver substantial economic, social and environmental benefits for the borough.

Policy T3 Transport behaviour change

- 11.3 St William supports the requirement or support for the delivery of Electric Vehicle Charging Points within a development (Part 6) albeit would note that where parking can only be provided in the basement of a development there is an ongoing issue with meeting relevant fire regulations and this should be taken account of when considering the requirements of this policy.
- 11.4 Part 6 (c) outlines a requirement for major developments with zero car parking on site to provide contributions towards EVCPs in other parts of the borough. Whilst St William supports the encouragement given to the provision of EVCPs, it is not considered necessary to provide this contribution where a development is meeting the primary transport objective of achieving car free development. This policy requirement is not considered to be justified and therefore does not meet the tests of soundness in the NPPF.

12 Waste and utilities

- 12.1 St William remains committed to helping to achieve sustainable development goals and recognises that as a business they have a very important role to play in the process. St William fully supports the need for local policies to help ensure waste is reduced and managed in a sustainable manner.

Policy W3 Waste management in developments

- 12.2 St William continues to support the overarching principle of Policy W3 which is to ensure new housing developments provide sufficient and accessible space to separate and store dry recyclables, organics and residual waste for collection and ensure there is sufficient waste management processes in place.
- 12.3 As noted previously, St William has some concern with the requirements of Part 3 which requires major housing developments on site allocations to provide a well-managed re-use and circular economy room, where residents can leave items for other residents to collect and reuse and/or which residents can use as a space for tool sharing. The principle of such a facility is supported but its provision will be down to whether there is sufficient space to accommodate such a use. This is particularly heightened by the new fire regulation requirements for a second stair core which is placing further pressure on floorplates and the various requirements of residential development. St William therefore request that the wording of this part of the policy is updated to either include 'where possible or feasible' or 'are strongly encouraged to provide'.
- 12.4 Part 4 maintains its requirement for developments to provide only one waste management solution or technology on site and Part 8 outlines the requirements for an automated vacuum waste collection system which is required from certain site allocations including Beckton Riverside and Bromley by Bow. As currently drafted, St William consider these requirements to be onerous and unjustified. There is often instances where more than one waste management solution is needed and is the most effective solution for a site, particularly large scale sites or sites that have a mix of tenures. Constraining a site to one waste management solution and indeed prescribing that waste management solution does not enable site solutions to be considered on a site by site basis.
- 12.5 With regards to the requirement for an automated vacuum waste collection system on both the Twelvetreepark and Bromley by Bow site allocation and the Beckton Riverside site allocation, the policy should make clear that this requirement should be subject to a feasibility study to ascertain whether it is possible. The provision of an automated vacuum waste collection system is typically only suitable for large scale masterplans i.e. once the entire site allocation has been built out and usually for developments in the region of c. 10,000 homes. The only known examples in London are at Wembley and Barking Riverside.
- 12.6 As is acknowledged within the site allocations, these sites will come forward as phased development and in the case of Beckton Riverside for example the first phase of development only resembles a small portion of the wider Beckton Riverside area with huge uncertainty over the timescales for the rest of the wider allocation coming forward. There are significant upfront

costs associated with bringing forward an automated vacuum waste collection system and in the context of the exceptional abnormal costs associated with gasworks sites and the significant constraints these sites have to contend with the additional cost associated with such a system would simply place an additional burden on the viability of these developments further delaying delivery of much needed new housing (particularly affordable housing).

- 12.7 At this stage, the most appropriate waste collection system is one that can service the phase coming forward at the time hence St William's request to remove this requirement or adjust the wording to only require an exploration of the feasibility of delivering such as system.
- 12.8 As currently drafted, St William consider the requirements of Parts 3, 4 and 8 of this policy to be unjustified and therefore failing to meet the soundness tests set out in the NPPF.

13 Neighbourhood N7 Three Mills

- 13.1 St William remains supportive of the 15-minute neighbourhood concept that underpins LBNs proposed spatial strategy and considers it a sound approach when considering development proposals, looking beyond individual sites and providing the ability to shape growth at a more local and detailed scale.
- 13.2 The inclusion of the Bromley by Bow and TwelveTrees Park sites (N7.SA2) (within Neighbourhood N7 Three Mills) is welcomed and we consider that these sites in combination can collectively deliver the components needed to create a new neighbourhood.

Vision

- 13.3 St William is pleased that the overall vision for Neighbourhood N7 'Three Mills' is for a high level of growth to be delivered through the transformation of these sites which will include an uplift in homes, employment generating uses, community facilities and a new Local Centre. The vision for a high level of growth should be reflected in Part 1 of the vision as well which currently only outlines support for a moderate uplift in density in 'enhance' areas. St William consider that 'moderate' should be updated to refer to a 'significant' uplift in density to align with the high level of growth envisaged for this neighbourhood that has been supported by LBN officers, and also to reflect the existing low density land uses.
- 13.4 This would also align with growth that is underway in this neighbourhood through the implementation of the consented development at TwelveTrees Park and the proposals at Bromley by Bow, which have secured resolution to grant.
- 13.5 The aspiration for the delivery of new residential moorings in suitable locations with appropriate ancillary facilities (Part 8) is supported in principle however as previously noted this should be subject to feasibility and deliverability, as this will be subject to third party approval. There may be technical reasons such as flood levels, the tidal nature of the River Lea, the need for river walls and flood defence barriers that may preclude the ability to delivery residential moorings. St William consider that this requirement should acknowledge that the delivery of new residential moorings is subject to feasibility and viability.
- 13.6 St William remain in support of the objectives to improve conditions for walking, cycling and public transport (Part 10), however requirements for improvements and new crossings can only be achieved where feasible and where site ownership permits. St William support the adoption of any local roads that would enable improvements to be made for the benefit of the wider neighbourhood.
- 13.7 With reference to Part 11, St William remains supportive of the requirement to retain existing mature trees, maximise the provision of new open space and green infrastructure and enhance existing Sites of Importance for Nature Conservation. However, in line with comments made in the Regulation 18 representations and as reflected in the proposals for Bromley by Bow, the exceptional circumstances of gasworks sites mean that the required remediation to enable the redevelopment of these sites necessitates the removal of all existing vegetation including trees in order to make the site safe and publicly accessible.

Site allocation N7.SA2 TwelveTrees Park and Former Bromley By Bow Gasworks

13.8 St William provides the following comments on the draft N7.SA2 TwelveTrees Park and Former Bromley By Bow Gasworks site allocation and also provide the suggested revisions to the site allocation in track changes further below for ease of reference. It should be noted that comments on the draft N7.SA2 TwelveTrees Park and Former Bromley By Bow Gasworks site allocation are in relation to the Bromley by Bow Gasworks only. Separate representations have been submitted that relate specifically for TwelveTrees Park.

- **Map** – we have a number of comments on the proposed map and for ease have drafted a proposed alternative to help illustrate our comments. Overall, it is felt that there is too much detail on the proposed map and the approach taken within the adopted site allocation would be more appropriate. Specifically, we suggest the following amendments:
 - The connection that is shown over the River Lea where the existing bridge is located is incorrect. Connections over the River Lea can only be safeguarded for as these proposed connections are outside of the St William's ownership.
- **Development principles** – St William provides the following comments on the development principles:
 - The requirement for the type and quantity of town centre uses to be consistent with a Local Centre designation is supported albeit St William would welcome clarification in this text or the text below in relation to prioritising light industrial uses on the gasworks site that other town centre uses would also be accepted to meet the need of the development.
 - As above, St William do not object to the principle of the requirement to prioritise industrial floorspace in the form of light industrial workspace suitable for micro-businesses and small and medium enterprises but do request that it is made clear in the site allocation that other town centre uses would also be acceptable on the gasworks site. This is reflected in the proposals that received resolution to grant.
 - In addition to the above, St William continues to request that the text included within the adopted site allocation S11 in relation to the use of the listed gasholders is carried forward into the new Local Plan. St William requests that an additional point is added to the development principles section that states:

Proposals will require an assessment of, and an appropriate viable strategy for, the Grade II listed gasholders.
- **Design principles** – St William provides the following comments on the design principles:
 - The requirement to ensure comprehensive design and development of the site (which relates to both the Bromley by Bow site and the TwelveTrees Park site) is understood and both sites have been designed and are being developed in the context of each other as sister companies' part of the Berkeley Group. This has however been achieved through measures such as Design Codes and s106 obligations that require detailed design later down the line to demonstrate how the

two sites can integrate. These mechanisms ensure that one site would not hold up the other from coming forward for development. Suggested amendments to this wording can be found in the mark up of the site allocation.

- As currently drafted, **building heights** are required to be between 3 and 30 storeys with the greatest height intended to be at the eastern end of the Site stepping down towards the gasholder. This is not reflective of the TwelveTrees Park site planning permission nor the resolution to grant received for the Bromley by Bow proposals which allows for buildings in excess of 30 storeys at both the eastern and western end of the TwelveTrees Park site. Given both of the site's location within an opportunity area and in close proximity to a number of transport interchanges, flexibility should be built into the policy for further height in line with recent applications and to reflect the site's opportunity to deliver a significant number of new homes including affordable homes. Furthermore, notwithstanding the need to protect and enhance the listed gasholders, given the strategic nature of the Bromley by Bow gasholder and TwelveTrees Park sites, tall buildings are also needed to landmark this important site and heritage assets. There is in principle support for this approach from officers at LBN and LBN's Design Review Panel who have provided constructive feedback on recent masterplan proposals for the Bromley by Bow gasworks site. The principle of tall buildings has also been established through the extant consent at TwelveTrees Park which were rigorously reviewed and concluded as beneficial through a design led approach. A design led approach should therefore be incorporated into the site allocation that enables tall buildings to be considered in the context of the wider design. This could be further supported by a Design Code. If heights need to be included they should be updated to reflect a range between 3 and 35 storeys as a guide. There should still be scope for buildings that extend above these heights to be considered on a case by case basis as long as they follow a design led approach and are subject to a robust townscape and visual impact assessment.
- In addition, the design principles should also reiterate that the Site is located in a **Tall Building Zone** where tall buildings are supported.
- The requirement for **ground floor active frontages** within the Local Centre should be extended to be a requirement for the remaining part of the site allocation as well.
- As noted earlier, whilst St William support the requirement for development to recognise the role of the **gasholders as heritage and character assets** and their potential contribution to place making. The site allocation must also acknowledge that a viable strategy for the reuse of the gasholders is needed to enable the retention and reuse of the gasholders as heritage and character assets. This is in line with the wording within the adopted site allocation and is particularly important in relation to gas holder no. 4 which is subject to enhanced listing. St William request that this is included within the development principles section.
- Whilst the **protection of SINC** is wholly supported in principle, the unique circumstances of gasworks sites and the required remediation mean that impact on SINC is unavoidable. Significant remediation is required to enable the Bromley

by Bow gasworks site to come forward for redevelopment and to make it publicly accessible. The mitigation hierarchy that is outlined within the London Plan should be applied in this instance and subject to following the mitigation hierarchy there should be acknowledgement that it may not always be possible to re-provide SINC in its current location for sites of this nature but compensatory SINC and/or biodiversity and ecological enhancements will be provided.

- The desire to increase **access to the waterways** is supported but should be subject to technical considerations and feasibility. Providing access to the waterways may not always be possible owing to technical considerations and/or site constraints and wording such as 'where possible' should be included (suggested amendments to wording and policies are set out in **Appendix 13**). The aspiration for new bridges to help reduce the severance caused by the existing transport infrastructure within this neighbourhood will also be dependent on site ownership and delivery constraints and should also incorporate wording that states 'where possible or feasible'.
- The requirement to establish a **connected network of streets and spaces** that connect to the wider street network is supported in principle but it should be noted that achieving this will be subject to land ownership. In particular the requirement to connect through to Abbey Mills.

13.9 Infrastructure requirements:

- Development is expected to contribute to active and public transport upgrades, including access to, and capacity at, West Ham Station. St William supports the principle of encouraging sustainable and active modes of travel however it should be noted that significant contributions and commitments have already been made from TwelveTrees Park in particular including the delivery of three bridges.
- The requirement for a health centre that is a minimum of 1,500 sqm designed to meet NHS needs and standards doesn't appear to reflect current NHS requirements for local health services. The text should be revised to only require a health centre where there is a need at the time of delivery. The site allocation should also make clear that the requirement for a new health centre should be within the local centre close to West Ham station.
- St William raises concern with the new requirement for an automated vacuum collection system on the TwelveTrees Park and Bromley by Bow gasworks site. As explained in comments to Policy W3, the reasons as to why an automated vacuum collection system is not feasible or deliverable with reference to site allocation N7.SA1 is due to both sites being already subject to either a planning permission (that has been implemented and under construction) or a resolution to grant meaning that it is not possible to retrofit an automated vacuum collection system. This would also not be practical or reasonable for a phased development of this scale.

14 Neighbourhood N8 Stratford and Maryland

14.1 St William continues to support the designation of the N8 Stratford and Maryland neighbourhood, and in particular the inclusion of the Rick Roberts Way site allocation (N8.SA7) which is one of several site allocations included within this proposed neighbourhood area.

Vision

14.2 St William therefore remains supportive of the vision for this area which seeks to create a safe, fair and lively neighbourhood with a mix of uses that recognise its unique and important role in both the Borough and for London. A high level of growth that will deliver new housing is also strongly supported.

14.3 St William reiterates their previous comments on the proposed vision:

14.4 Part 1: given the strategic nature of this new neighbourhood, its location within an opportunity area and the significant change and transformation that has occurred already support should be outlined for a significant uplift in density rather than a moderate uplift in density. Details of the proposed amendments to the wording of the vision can be found in the Schedule of Proposed Amendments at **Appendix 14**.

Site allocation N8.SA7 Rick Roberts Way

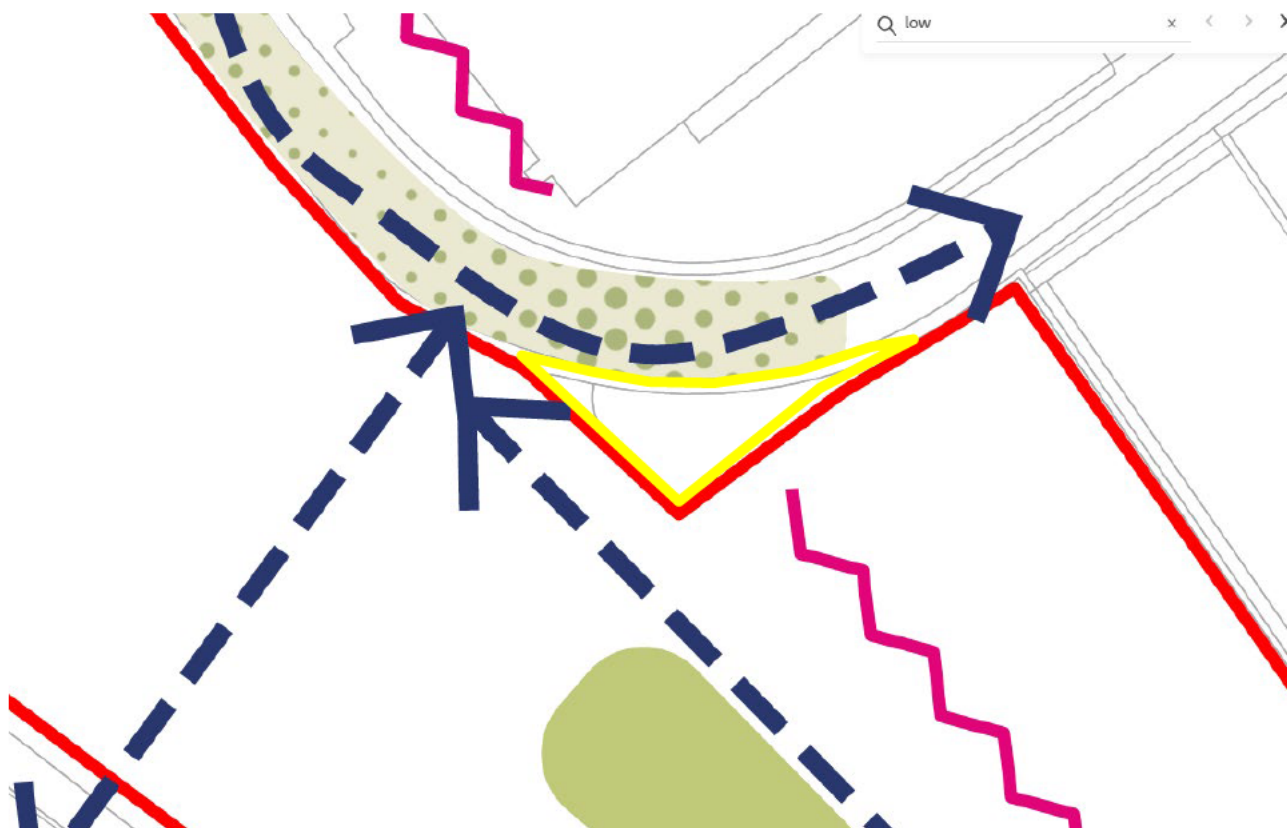
14.5 Overall, St William remains supportive of the general approach to the Rick Roberts Way site allocation N8.SA7 and the mix of uses that are promoted. However, St William provides the following specific comments on this draft site allocation.

N8.SA7 Rick Roberts Way

▪ Map:

- It should be made clear that the key routes identified are intended as pedestrian and cycle routes.
- The triangular land under the ownership of LLDC, which lays between the land under the ownership of St William and Rick Roberts Way, should be included within the site allocation boundary as it forms part of the submitted planning application and St William has access rights over this land. This parcel of land is identified in a yellow outline in the plan below.

Figure 14.1: Site Allocation N8.SA7 Suggested Inclusion



- Furthermore, the portion of the St William land which is identified as an opportunity for open space is contrary to the 'Development Principles' outlined on page 496 which state that the 1.2 ha of open space should be provided on the publicly owned land (ie. not the St William site). The Map should be updated accordingly, orientated to clearly demarcate this 1.2 ha of open space within publicly owned land, rather than within the St William site. As currently written, the site allocation wording does not align with the map.

Design principles:

- St William requests that building heights are adjusted to extend to between 10 and 17 storeys (rather than 16 as drafted) with building heights stepping down towards the listed cottages on Abbey Lane. This reflects the building heights proposed within St William's planning application which has been subject to a rigorous design review process in consultation with Council planning and design officers. Notwithstanding this, any building heights stated should be for guidance only and not preclude taller buildings as long as they are subject to a robust townscape and visual impact assessment. The proposed building heights as currently drafted are considered to be substantially lower than the emerging context for this neighbourhood which at Stratford High Street has buildings extending up to 43 storeys in height.
- Development in the south of the allocation (Stratford Gasworks) is intended for residential development only and this should be clarified within the policy wording.

- Development is expected to improve walking and cycling conditions and the public realm on Rick Roberts Way, Stratford High Street and Abbey Lane including through improved frontages. This should be only 'where possible' as this must be balanced with site constraints and other aspirations for the site.
- St William support the aspiration for improved connections to the Greenway. However, it should be acknowledged that the Greenway lies outside of the site allocation and is owned by a third party (Thames Water). It is pertinent to note that any improvements or new connection to the Greenway from the site allocation (including to the existing stairs connecting to Abbey Lane) would be subject to approval by Thames Water. And as such the allocation wording should be amended to require development to facilitate new connections. Additionally, any improvements or new connections would be subject to feasibility studies given the essential infrastructure which lies underneath the Greenway and extensive level changes.
- The site allocation should make clear that the two new routes required either side of the school site should be provided on LBN and LLDC land holdings. The site allocation should be amended to remove the requirement to provide an accessible connection from Abbey Lane to the Greenway and stairs. Within St William's planning application an accessible connection is proposed through the St William site between Abbey Lane and Rick Roberts Way, which would connect onto one of the new routes either side of the school connecting to the Greenway.
- **Infrastructure requirements:**
 - The site allocation should make clear that the sports-lit Multi-Use Games Area (if not delivered at N8.SA5 Stratford Town Centre West), the open space, the SEND school and sports hall are to be provided within the site allocation on land within LLDC and LBN ownership and not the Stratford Gasworks site which is intended for residential development.
- **Phasing and implementation:**
 - Phasing should be short and medium term.
 - The underground cable route is a UKPN asset rather than National Grid.
 - The potential impact of the gas pipes located underneath the Site should also be taken into account at the pre-application stage.

15 Neighbourhood N13 East Ham

Adopted Newham Local Plan (2018)

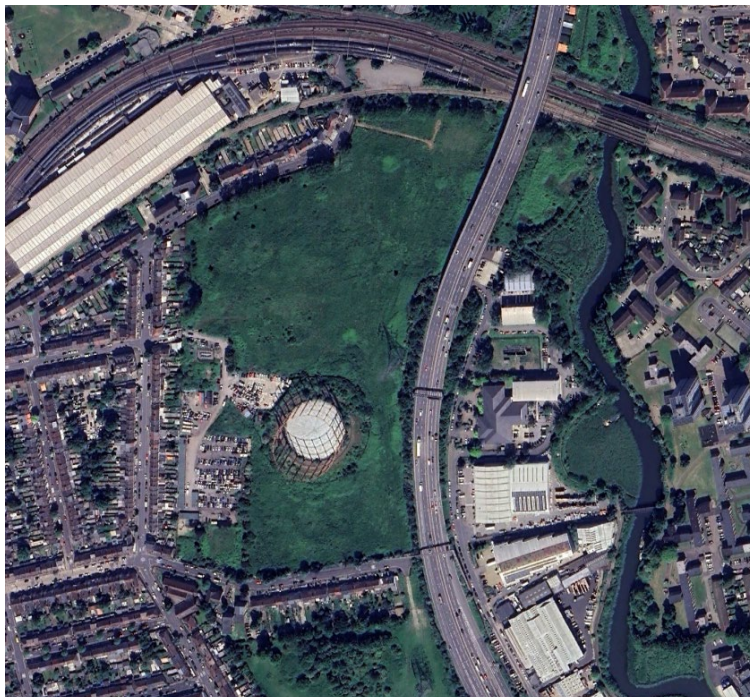
15.1 The adopted local plan identifies the principal areas of previously developed land, and the MOL classification (GS82), replicated below at Figure 15.1.

Figure 15.1: 2018 Adopted Local Plan Proposals Map



15.2 The adopted site allocation broadly reflects the previously developed land at the surface (2.04ha), albeit there are numerous below ground structures as denoted at Figure 15.3.

Figure 15.2: Aerial Image of Site

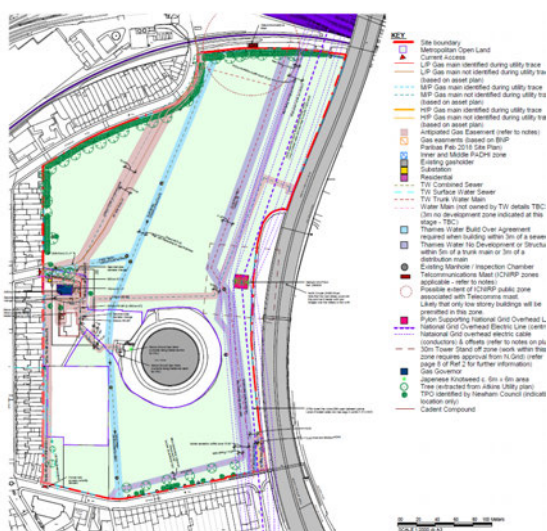


Regulation 19 Newham Local Plan

15.3 The former East Ham Gasworks comprises a gas holder and associated gas operational equipment located on previously developed land accessed off Leigh Road along the eastern edge of the Borough located within a wider setting of Metropolitan Open Land ('MOL'). The gas holder is a tall building (approximately 52m AOD in height) for the purposes of local plan and London Plan¹.

15.4 There are multiple gas easements and Thames Water structures which cross the site, some of which are underground, as illustrated at Figure 15.1 below. The site is not permeable, is not, nor has it been, publicly accessible. It is anticipated that remediation works would be required to open up the site for public access. This would require the removal of the top layer of soil from the site.

Figure 15.3: Site Constraints Plan



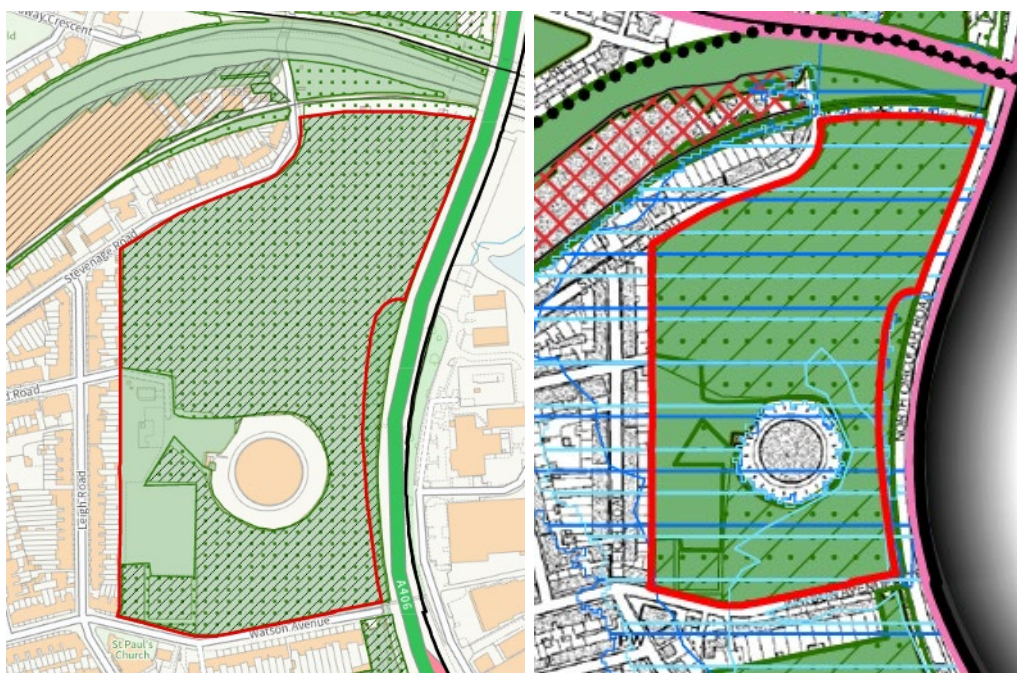
15.5 The site is located within Policy N13 East Ham (one of 3 site allocations) as Site allocation N13 SA3 Former East Ham Gasworks.

¹ London Plan Policy D9(A) definition of a tall building and Reg 18 Policy D4 (Tall buildings in Newham are defined as those at or over 21m (roughly seven storeys))

Figure 15.4: Regulation 18 vs Regulation Local Plan Refresh Proposals Map

Regulation 18 Local Plan Map

Regulation 19 Local Plan Map



- 15.6 The Regulation 19 proposals map retains the designation of the majority of the site as MOL (except the gas holder frame and previously developed land) but, unlike the adopted proposals map, now allocates the site as open space GWS1 East Ham Sports Ground, albeit recognising that it is “not accessible” (except for the gas holder frame itself). It is also important to note that the Site has always been in private ownership and that its historic sport facilities were predominantly used by employees of the various local gasworks and not specifically for wider public use.
- 15.7 The designation of the MOL remains the same area and the reconfiguration is considered to be minimal. St William remains of the view that a substantial amendment to the MOL allocation and the GSW1 East Ham Sports Ground by designation is necessary to deliver development within the allocation. St William agrees with the Criteria A assessment of the MOL which confirms that the reorganisation of the MOL will form a more coherent parcel whilst protecting its core function. However, it is unclear why an insubstantial quantum of MOL has been removed or why the extent of the changes of the boundary are proposed to be so minimal.
- 15.8 As identified within the Area 21 assessment, the parcel has weak-moderate recreation and biodiversity value. The previously development land should also not constitute open space, as has been identified. Therefore, it is considered that the site does not meet the tests of MOL. Emerging Policy GWS1: Green spaces protects existing open space to ensure there is no net loss, except where it meets the criteria in part 2 which supports development in exceptional circumstances. We consider that it would not be appropriate to allocate, and require open space reprovion, on land not used as open space, and particularly land that is previously developed.
- 15.9 A new SINC is proposed and the justification of this will require further assessment, particularly given the likely high levels of contamination across the site and the ‘weak-moderate’

biodiversity value identified within the MOL Review. In St William's experience, holistic site wide remediation will be required to bring this site forward.

Designation of MOL

15.10 London Plan ('LP') Policy G3 affords MOL the same status and level of protection as Green Belt. It is therefore subject to national policies on proposals affecting the Green Belt at paragraph 152 to 156 of the Framework.

15.11 LP Policy G3 confirms that boroughs should designate MOL by establishing that the land meets one of the following criteria:

- Criteria A: it contributes to the physical structure of London by being clearly distinguishable from the built-up area.
- Criteria 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.
- Criteria C: it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value.
- Criteria D: it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.

15.12 A review of the MOL has been undertaken, which has informed the Regulation 19 Draft Local Plan. The MOL within the Site is identified as MOL Area 21 and whilst the boundary has been reconfigured, the size of this area remains the same. The Newham Metropolitan Open Land Review (2024) assesses the Site as follows:

- The overall parcel meets Criteria A
- The parcel does not meet Criteria B
- The parcel does not meet Criteria C
- The parcel meets Criteria D.

15.13 We conclude that the land does not meet the designation criteria of LP Policy G3 for the following reasons:-

- Criteria A: The land is not clearly distinguishable from the built-up area owing to the scale and proximity of the gasholder (a tall building) located geographically within the centre of the site. The site is enclosed on all sides by residential development, railway infrastructure and, to the east the elevated A406 North Circular Road. Both the railway and the north circular dissects the site from further MOL to the north. An electricity pylon is located along the eastern edge alongside the A406. Cumulatively these features detract from an open space setting and contribute to the sense of a built-up area.
- Criteria B: The site is closed to the public and is inaccessible and impermeable. It does not include open air facilities for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London.
- Criteria C: The site does not contain features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value.

15.14 There is green space allocated to the north and south, but these are dissected by the Overground, District Line and Hammersmith and City Lines and Watson Avenue. Whilst on plan, the site appears to link through to other parcels and green corridors in reality these parcels and corridors are separated by significant physical infrastructure. None of criterion A-C are addressed.

15.15 Policy G3 part (c) allows for alterations to the boundary of MOL, in consultation with the Mayor of London, and adjoining boroughs. These changes should be undertaken in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL.

N13 East Ham

15.16 The vision for East Ham will be achieved by 13 criteria, some of which we comment on below.

- Point 1: *Moderate uplift in density will be supported where it enhances the character of the area, particularly in areas of mixed urban form.* We consider that design led optimisation as required by the London Plan and local Policy D3 should be promoted. The scale and volume of the existing gas holder represents a tall building on previously developed land which informs the existing character and appearance of the area.
- Point 4: The East Ham Tall Building Zone should include N13.SA3 owing to the scale of the existing gasholder on site. The proposals map should be amended and Local Policy D4 should be revised to reflect the height of the existing gas holder. LBNs Characterisation Study (June 2024) has omitted the existing tall building on site and unlike the other gasworks in the Borough, is subject to limited reference within the study.
- Point 9: Requiring new and improved walking and cycling links to the neighbourhood's network of green spaces and nature and to and along the River Roding in partnership with London Boroughs of Redbridge and Barking and Dagenham – a major policy objective that we can assist with, but with change to the MOL designation.
- Point 11: Securing public access to green and blue spaces currently inaccessible to the public, particularly along the River Roding and at N13.SA3 Former East Ham Gasworks is a policy objective that is supported but will require development to facilitate and fund these improvements.
- Point 12: In respect of protecting and enhancing the playing pitches and sports courts, the previous sports ground did not have wider public access as was in private ownership and the predominant use was by former employees.

N13.SA3 Former East Ham Gasworks

Development principles

- The development principles of residential development and open space are supported. LP Policy H1 designates surplus gasworks sites as a strategic source of housing supply. Residential development will meet a particular housing need in Newham. LBNs Site Allocation and Housing Trajectory Methodology Note (December 2022) confirms that Newham is unable to demonstrate a 5 year housing land supply (5YHLS).

4.6.2. Table 10 shows that Newham is unable to demonstrate a 5 year housing land supply when measured against the adopted London Plan housing target. This position is worsened when a 5% buffer is applied to the borough's capacity derived housing target. As per national guidance, shortfall against Newham's previously adopted housing requirement figure has been added to the 5 year supply target (the Sedgefield approach). Taking the shortfall and buffer into consideration Newham only has a five year land supply of 2.69 years. Table 8 demonstrates that Newham also 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 15,721 units.

- LBN can only demonstrate a 2.69 housing land supply, and confirms that "Newham also 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 15,721 units". This is significant and constituted an exceptional circumstance to review the MOL boundaries at this site to help meet this shortfall. The area of land outside of the MOL within the site allocation should have been increased as part of the MOL boundary review.
- The Framework recognises that previously developed land can comprises land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure.
- We would like to work with the Council to understand the reference to a community facility. We consider that the provision of such a community facility would need to be viable, when considering the wider costs associated with the Site, and the specific proposed use would be subject to a needs-based assessment.

Design principles

- "Mid-rise residential buildings below 21m 9ca. 7 storeys)" does not reflect the character of the existing site, or the presence of a tall building on site. The building heights should be increased.
- Framework paragraph 124 gives "*substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.*"
- LP Footnote 59 also recognises that "*some surplus utilities sites are subject to substantial decontamination, enabling and remediation costs. If it is robustly demonstrated that extraordinary decontamination, enabling or remediation costs must be incurred to bring a surplus utilities site forward for development, then a 35 percent affordable housing threshold could be applied, subject to detailed evidence, including viability evidence, being made available*".
- Former gasworks sites benefit from specific London Plan policies, and the full weight of the Framework. They represent an opportunity to remediate despoiled, degraded, derelict and contaminated land and are subject to substantial decontamination, enabling and remediation costs. The following wording should therefore be included to the Site Allocation:-

“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 gas works².”

- The allocation of the site as SINC does not practically align with the allocation’s land use aspirations, including the sports use. Given the previous use of the site, wide-scale remediation is required that will remove all existing biodiversity value. The SINC designation on the site is not supported and should be removed from the allocation.

Map

- The map, illustrated in Figure 15.5 below does not identify the previously developed land, and incorrectly applies a green wash across the whole site.

Figure 15.5: Regulation 19 Local Plan Refresh Site Allocation N13.SA3 Map



Opportunities, Public Benefits and Exceptional Circumstances

- In weighing the balance of opportunities, public benefits and exceptional circumstances that support an alternative approach to MOL boundaries at N13.SA3 Former East Ham Gasworks, as outlined within the Regulation 18 Representations, we have again set out below three scenarios for the site.

² This wording was proposed and adopted in the Tower Hamlets Local Plan review for 3 gasworks site allocations.

- **Do nothing scenario** – the Site comprises an impermeable contaminated former gasworks site, with operational gas equipment. It does not meet the LP Policy G3 criteria for MOL designation, does not comprise publicly accessible open space and does not currently afford the local community any public benefit. To change this scenario it is necessary to deliver enabling development on site to fund remediation and deliver wider public benefits.
- **Regulation 19 Policy Scenario** – Development of 7 storeys on the undesignated ‘white’ land proposed in the Regulation 19 Plan will not deliver the aims and objectives of N13.SA3 Former East Ham Gasworks. The abnormal costs of bringing forward a gasworks site for residential development are substantial, as would be enhancing the quality and range of uses of MOL in accordance with Policy G3, in addition to opening up the site for public use and benefit which would require significant de-contamination which would likely be require the whole site to be remediated. In its current form the wording of N13.SA3 would deliver around 300 new homes (at 7 storeys) which may give rise to viability challenges of deliverability taking into account other policies of the local plan, including the delivery of affordable housing.
- **The alternative scenario** – To achieve the objectives of the Plan as a whole, and to support enhanced quality and range of uses of MOL, de-designation of the entirety of the MOL (or part of it) for enabling development would generate significant public benefits including the remediation of the whole site for public use, enabling it to be opened up or public access. The Newham Metropolitan Open Land Review (2024) unequivocally does not reconfigure the boundary of the MOL that enables the allocation to deliver enough development to achieve the wider site allocation requirements, specifically the provision of leisure and recreation uses. It is estimated that a significant uplift in homes estimated at 700 homes would be needed, for example, across the southern half, to facilitate MOL improvements to the northern half.
- We set out below important material considerations which inform the alternative policy approach to the site.
- **London Plan** – Policy H1 of the London Plan designates surplus utility sites as a strategic source of housing supply in London.
- **Strategic undersupply of homes in London** – The London Plan is not able to meet the objectively assessed need for housing in London of 80,000 homes per annum and is currently in deficit for both market housing and affordable homes.
- **Local undersupply of homes in Newham** – To assist LBN in meeting the objectively assessed need for housing locally and to address current deficits for both market housing and affordable homes (and the shortfall of 15,721 homes) the site would be able to make a significant contribution.
- **Using brownfield land for homes** – Paragraph 124 of the Framework gives substantial weight to the value of using suitable brownfield land within settlements for homes. The previously developed land on site, and its curtilage, is significant and can contribute to housing supply.
- **Using brownfield land for homes** – Paragraph 124 of the Framework gives substantial weight to opportunities to remediate despoiled, degraded, derelict and contaminated land. This abnormal and onerous extent of gas sites is significant and recognised by the London Plan.

- **Proposed housing** - High quality new homes would contribute towards the Borough's increased annual housing target in the London Plan; and its plan to deliver additional homes to meet its minimum housing needs.
- **Building beautiful** – The proposed replacement of the existing gasholder frame, of no aesthetic or heritage value, with high quality buildings that respect the residential character and appearance of the area whilst respecting the industrial spirit of the previous use in a more appropriate form would enhance the character and appearance of the area.
- **Public access and permeability** – The site has been inaccessible for decades and forms an impermeable barrier between various communities. This situation is exacerbated by the existing road network. The opening up of the site to the public to create a direct, overlooked, and visually permeable open space for walking, cycling (and sport) is a significant public benefit.
- **MOL function** – Proposals to enhance access to the MOL and improve the poor quality areas such that they provide a wider range of benefits for Londoners that are appropriate within MOL including improved public access for all, inclusive design, recreation facilities, habitat creation, landscaping improvement and flood storage in accordance with London Plan paragraph 8.3.4 would be a public benefit.
- **Economic** – This development will generate improved economic productivity as a result of job creation; resident local net expenditure; council tax; new homes bonus and CIL. The Berkeley Group invest in construction jobs and the delivery of a Local Employment and Skills Plan that offers training and apprenticeship opportunities to local young people during the construction.
- **Social benefits** – The development will support a strong, vibrant and healthy community, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities health and social well-being. Improvements to social value to the local community will implement Berkeley's unique Social Sustainability Assessment.
- **Hazardous Substances Consent** – Redevelopment of the site will lead to the revocation of the existing hazardous substances consent. This will reduce the extent to which there might be a public health hazard arising from this site.
- Individually and cumulatively, these material considerations are a benefit of redevelopment at N13.SA3, and could only be delivered in the alternative policy scenario.
- Details of the proposed amendments to the wording of the vision can be found in the Schedule of Proposed Amendments at **Appendix 15**.

16 Neighbourhood N17 Gallions Reach

- 16.1 St William continues to support LBN (and the GLA) in seeking to transform Gallions Reach into a new neighbourhood.
- 16.2 St William actively supports the delivery of an extended DLR line and new station in achieving this but welcomes the acknowledgment in the Regulation 19 draft that similar transformative (as confirmed by Transport for London) public transport intervention measures could also assist or achieve this. This revised wording helps to make clear that the DLR line extension and new station is the preferred policy approach; however, in the event the DLR improvements do not come forward (or do not come forward for some time), the regeneration and development of this part of London should not be precluded.

Vision

- 16.3 St William wishes to make a number of specific comments on the vision, as follows:
- The vision for Gallions Reach states that it will be achieved through the extension of the DLR and creation of a new DLR station or a similarly transformative (as confirmed by TfL) public transport intervention, along with improved capacity at Gallions Reach station. St William are in the process of discussing the capacity of Gallions Reach station with TfL as part of the proposals for the first phase of development at Beckton Riverside. Their assessments confirm that there is sufficient capacity at Gallions Reach station. St William consider that the vision text should therefore be amended to reference a phased-approach to development and seek improved connections and access to Gallions Reach station rather than improved capacity.
 - In line with the above comments, the vision still makes clear that it is the proposed transport interventions that will enable an uplift in housing density at Beckton Riverside. This wording does not reflect the text set out within the OAPF which refers to Beckton Riverside evolving and intensifying to become a Major Town Centre and that a cohesive masterplan should be developed for the variety of the sites within the site allocation to realise the opportunity which will be supported by a DLR extension (or similar transformative public transport intervention). St William consider that the vision should be updated to align with the text in the OAPF for continuity but also to reflect the reality of how large regeneration areas such as Beckton Riverside come forward. The first phase of development at Beckton Riverside will act as a catalyst for growth enabling the wider site allocation to evolve or come forward in phases which will be supported by a DLR extension or other similar transformative public transport intervention.
 - In addition, and in line with our previous comments, we do consider there should be reference to a 'significant' uplift in housing density rather than just an uplift in housing density to reflect the Site's location in an opportunity area and its strategic role in housing delivery not just for Beckton and the Borough, but London more widely. LBNs significant short fall in housing (only being able to demonstrate a 2.69 year housing land supply) and recent NPPF consultation placing greater emphasis on the role of brownfield land demonstrates the need for brownfield sites in growth areas to maximise their contribution which can only be achieved through a step change in density.

- Reference to the Site's location within the Gallions Reach Tall Building Zone is welcomed. Specific comments on the Tall Building Zone policy and the prescribed heights within the Gallions Reach Tall Building Zone can be found in relation to draft Policy D4, which note that as currently drafted the maximum heights (32m-50m) are not considered tall enough for a strategic site of this nature nor do they fully reflect the heights proposed as part of the Phase 1 proposals which have been subject to extensive pre-application discussion with LBN (including LBN's Design Review Panel) and the GLA. Where heights are prescribed these should also acknowledge that a design led approach should be taken to optimising housing delivery.
- N17 Part 2 encourages development to integrate and reflect the historic uses of the site such as the former gasholders and Victorian river piers, as features of the neighbourhood's character. Whilst the principle of reflecting the previous use of the Site in any future development proposal is supported, and an approach that St William are familiar with from the redevelopment of their former gasworks sites, as previously noted the former gasholders no longer exist on site (and have never been subject to a formal or local heritage designation). It is also pertinent to acknowledge within the policy wording that the Victorian river piers are not within the ownership or control of St William and therefore any development, restoration or refurbishment would be subject to a third party. This should be made clearer at Part 2 and the approach to reflecting the previous use within development proposals should be proportionate to the existing position on site.
- Part 9 outlines policy support for the extension of the DLR depot (which we assume aligns with the proposed extension to the SIL in this location should the DLR not come forward). We previously raised concern over the size of this proposed extension and the potential for any further extension to the SIL (which applies to the DLR depot) in such close proximity to the existing Gallions Reach DLR station which would encroach on St William owned land. Any encroachment onto St William's land has the potential to significantly reduce any future developable area which is not supported especially owing to the exceptional abnormal circumstances of this former gasworks site and various other site constraints including the existing safeguarded land. It should also be noted that there may be future opportunities to masterplan a future mixed-use build over the depot. To this end, St William has suggested some additional text for Part 9 which seeks to ensure that any future extension of the DLR depot is well considered in collaboration with other stakeholders at Beckton Riverside.
- Part 11 in relation to improving conditions for walking, cycling and public transport seeks the provision of new bridges for walking and cycling to help mitigate severance caused by new train tracks, including through the provision of new bridges for walking and cycling (Part 10) as well as the provision of new crossings at Royal Docks Road, Gallions Reach roundabout, Alfred's Way and across the River Roding to reduce severance and to improve connectivity to Beckton and the wider network of neighbourhoods (Part 11e). In both of these cases, we still consider that these requirements should be subject to the feasibility and viability of doing so. Bridges in particular are usually subject to multiple land ownerships which can present a challenge in the delivery of a new connection. Furthermore, they clearly come at a significant cost which must be considered in the round of other development costs and considered as part of the viability of the development.
- Part 11c also outlines its support for the provision of a Thames Clipper Pier. Again, whilst St William support the principle of a Thames Clipper Pier at Beckton Riverside it

comes with a number of considerations including demand, cost, siting and process for its delivery. The requirement for a Thames Clipper Pier should not place additional burden on the delivery of development at Beckton Riverside as it is not considered an essential piece of infrastructure to enable development. The Phase 1 proposals at Beckton Riverside would not prejudice the provision of a new Thames Clipper Pier and it is considered that the policy wording should be updated to reflect this.

- As noted previously, securing public access to green and blue spaces and nature that are currently inaccessible to the public, including opportunities for water-related and water-dependent activities (Part 12) should also be subject to feasibility. There may be technical reasons or reasons of flood risk mitigation that may preclude this in particular public access.
- As noted previously, the retention of existing mature trees on the former gasworks site will be dependent on the extent of remediation required to enable redevelopment which will result in the need for all vegetation including trees to be removed (Part 13). This would also include any Site of Importance for Nature Conservation, which is currently a proposed designation for the Site rather than an existing designation. Whilst it is understood there is a clear desire to increase the provision of open space and areas with biodiversity value across the Borough, the provision of a new SINC on a site that is earmarked for significant regeneration and growth and that is dependent on extensive remediation means that there is a strong likelihood that any SINC designation would need to be removed as soon as the Site is permitted for redevelopment. The proposed SINC designation should therefore be removed in the context of the wider site allocation and site specific characteristics of the former gasworks site.
- Part 17 requires the provision of a new electricity substation. It should be noted that a new UKPN substation is being delivered on land to the west of Gallions Reach DLR station, just outside the neighbourhood boundary. On this basis, it is requested that this policy wording is updated to reflect the fact that a new electricity substation could be delivered in or close to the new neighbourhood.
- Part 18 supports the provision of new community facilities when in conformity with draft Local Plan Policy SI2, including a leisure centre and faith facilities. Draft Policy SI2 makes clear that the delivery of new community facilities on identified site allocations should be subject to a needs based assessment at the time of delivery, which is supported but should also be set out within Part 18 of the site allocation for consistency and clarity. The same text should apply to Parts 20 and 21, which require education and health centre provision both of which are also subject to needs based assessment in draft Policy SI2.
- With regards to the requirement for a secondary and primary school in close proximity to Atlantis Avenue and Armada Way (Part 20), as currently drafted the prescribed locations for the proposed schools do not account for various different development scenarios and/or design of the masterplan and is insufficiently flexible. Notwithstanding this, if flexibility cannot be incorporated into this policy then St William requests that it makes clear that a secondary school is sought in the north of the neighbourhood and the primary school is sought close to Atlantis Avenue.
- Details of the proposed amendments to the wording of the vision can be found in the Schedule of Proposed Amendments at **Appendix 16**.

- Site allocation N17.SA1 Beckton Riverside

- 16.4 Overall, St William welcome the general approach to the Beckton Riverside site allocation N17.SA1 which seeks to encourage the transformation of this site through the delivery of a mixed use neighbourhood including residential development, industrial and employment uses, community and education uses, leisure uses, open space and town centres uses.
- 16.5 St William welcomes the amendments made to this site allocation which acknowledges that the scale and nature of development on this site is contingent on the proposed changes to transport infrastructure on this site including a new DLR station and track and/or delivery of a river crossing or the release of the safeguarded land for a river crossing.
- 16.6 St William is pleased that the site allocation is structured in a manner that acknowledges an early phase of development can come forward in advance of the DLR construction contract being let or a similarly transformative public transport intervention has confirmed funding. St William consider this to be a sound approach and will ensure that policy is deliverable over the plan period and regeneration and development at Beckton Riverside can come forward and meet its development potential as set out in the Royal Docks and Becton Riverside Opportunity Area.
- 16.7 Notwithstanding the above, St William still have a number of specific comments on the site allocation which are provided below.

N17.SA1 Beckton Riverside

- **Existing uses:** the updated description of existing uses now makes reference to the SINC designation, which as noted previously is a proposed designation rather than an existing designation and St William considers this to conflict with the overall objective of the site allocation.
- **Development principles:**
 - Employment uses outside of the SIL should not be limited to light industrial but could support local employment spaces such as makers space or other employment generating uses which could include the full range of town centre uses.
 - As noted earlier in these representations, the requirement for a new health centre should be subject to an up to date needs assessment at the time of delivery as well as being subject to NHS requirements. Newham should be aware that the NHS do not typically require smaller facilities now and instead focus their efforts on delivering larger facilities in this instance in the future town centre. The provision of a small health centre in the neighbourhood parade should therefore be subject to a needs based assessment and discussion with the NHS. The provision of an expanded health hub close to the town centre should be not be assumed to be an expanded health hub and policy wording should incorporate a scenario where this could be a new health centre provision depending on the outcome of discussions with the NHS.
 - S William supports the principle of improved links to the Greenway; however, it is pertinent to acknowledge in policy wording that this will require third party

involvement as all land between the site allocation and the Greenway is not within St William's ownership and therefore cannot to commit to the delivery as written. Therefore, policy wording should be caveated to state that this should be delivered 'where deliverable'.

- Finally, St William wish to reiterate previous comments and suggestions that the site allocation should acknowledge the exceptional circumstances associated with former gasworks sites, which require substantial remediation to enable the redevelopment of these sites. National Planning Policy Framework paragraph 124 gives *"substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land."* London Plan footnote 59 recognises that *"some surplus utilities sites are subject to substantial decontamination, enabling and remediation costs. If it is robustly demonstrated that extraordinary decontamination, enabling or remediation costs must be incurred to bring a surplus utilities site forward for development, then a 35% affordable housing threshold could be applied, subject to detailed evidence, including viability evidence, being made available"*. Former gasworks sites benefit from London Plan policies, and the full weight of the Framework. They represent an opportunity to remediate despoiled, degraded, derelict and contaminated land and are subject to substantial decontamination, enabling and remediation costs.
- **Design principles:**
 - With reference to building height references within the site allocation, St William maintain that the site allocation should make clear that the Site is located within the Gallions Reach Tall Building Zone (TBZ5 as outlined in Policy D4).
 - In line with our comments on draft Policy D4 on Tall Building Zone 5 Gallions Reach, the heights cited do not fully reflect the heights proposed within the Phase 1 Beckton Riverside application and which have been subject to extensive pre-application engagement and design review. The maximum heights cited are also not considered to be reflective of the Site's location within an opportunity area, alongside the river or to reflect the lack of sensitivities in this area i.e. no heritage assets, no existing residential, proximity of industrial uses follow a design led approach in line with Policy D3 of the London Plan.
 - St William requests that building heights are adjusted to extend to between 17 and 27 storeys (rather than up to 16 storeys as drafted) with building heights stepping down in areas which are controlled by CAA height restrictions.
 - All design principles should follow a design led approach that optimises delivery in line with the London Plan.
- **Infrastructure requirements:**
 - In line with earlier comments in these representations references to improving capacity at Gallions Reach DLR should be adjusted to refer to improved access

and connections to Gallions Reach DLR on the basis that recent analysis has demonstrated that there is sufficient surplus capacity at Gallions Reach DLR.

- St William raises concern with the new requirement for an automated vacuum collection system on the Beckton Riverside site. Whilst the N17 Gallions Reach neighbourhood and associated site allocation relates to the entire Beckton Riverside area, at this stage and in advance of any transformative public transport intervention only an early phase of delivery is proposed to come forward. The proposed quantum of development within this first phase is not of a sufficient scale to be able to support the upfront costs of an automated vacuum collection system which has to date only been implemented at two strategic development sites in London – Wembley and Barking Riverside. Furthermore, the proposals for Beckton Riverside Phase 1 have been developed ahead of this requirement in draft policy wording. On this basis, St William request that this requirement is removed or made clear that it is to be considered as part of a feasibility and viability study.
- The requirement for an expanded health hub (on the basis and assumption that a new health centre has been provided within an earlier phase of development) should be updated to state that it is either a new or expanded health hub on the basis that the provision of a health centre in the early phase of development may not meet NHS requirements because of its scale.
- **Phasing and implementation:**
 - Phasing should be early, medium and long term.

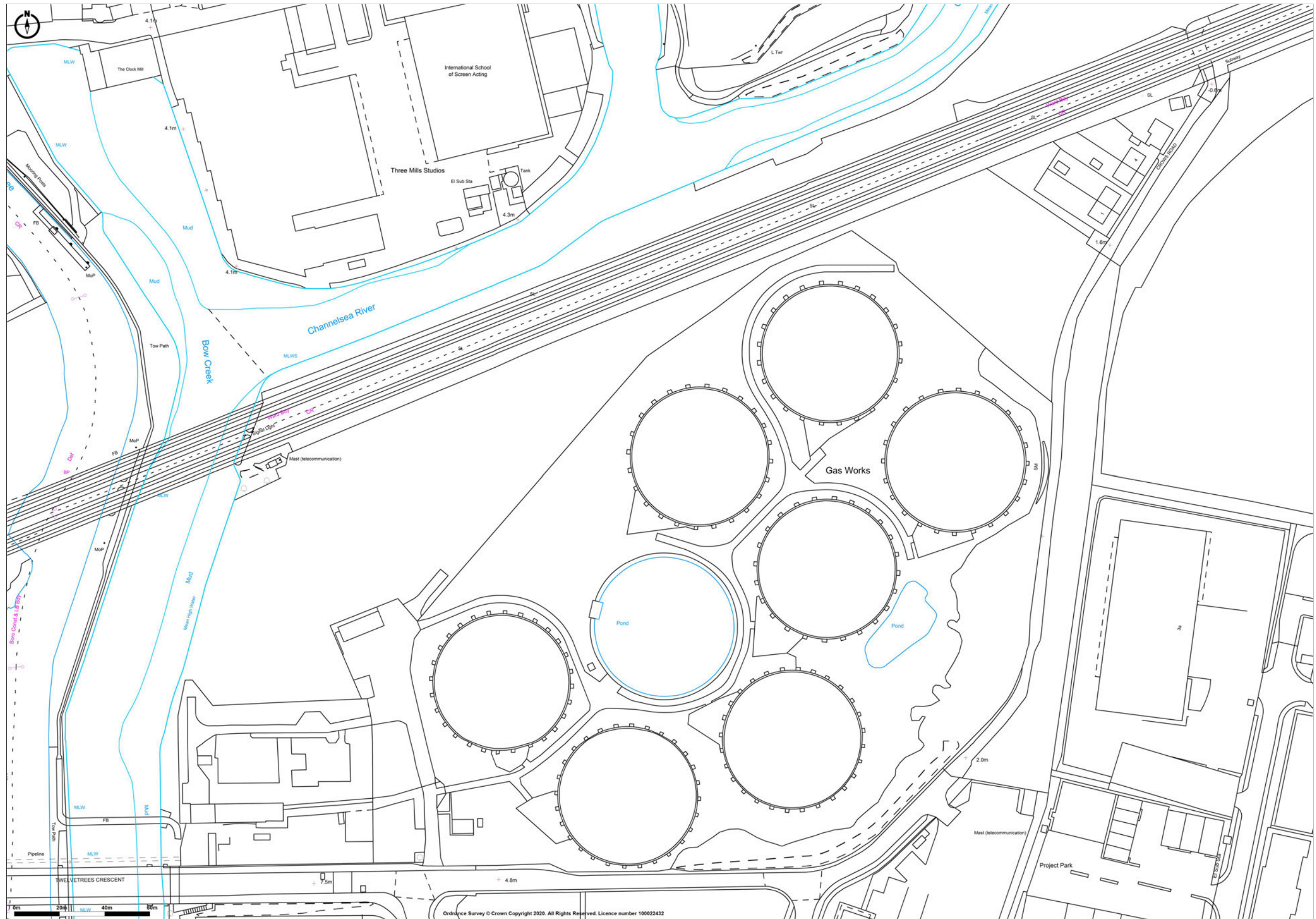
17 Conclusion

- 17.1 St William welcomes the opportunity to input to the Regulation 19 version of the draft Local Plan and trusts that the enclosed comments are clear and constructive highlighting where proposed policies are not considered to be sound at this important stage of the Local Plan process.
- 17.2 St William acknowledge the overall positive approach that is being taken to development proposals within the Borough and appreciate that LBN have carried out significant work to date in developing the new Local Plan. However, as outlined in this representation, St William consider that elements of the Regulation 19 draft Local Plan in their current form are not sound.
- 17.3 Challenging economic conditions due to increasing build costs, high interest rates, new building regulation etc have severely impacted the deliverability and viability of housing, particularly on complex brownfield sites and within the Borough. As set out in the NPPF and PPG, the Local Plan needs to ensure the cumulative impact of its policies do not further hamper the delivery of much needed housing in the borough. St William consider that the policy wording specifically in relation to affordable housing requires set by Policy H3 is not realistic, will leave the public benefits of development unrealised and crucially will further stifle poor housing delivery rates in the Borough.
- 17.4 St William takes seriously its role as a responsible developer and has extensive experience of delivering high quality homes and places that improve people's lives and create new and inclusive communities. St William's sites represent a huge opportunity to deliver not only much needed new homes for the borough but a range of public benefits. St William want to use their experience for the benefit of the Borough and its residents and ensure that forthcoming developments at the Bromley by Bow, TwelveTrees Park, Beckton Riverside, East Ham and Rick Roberts Way can be used to set an example for development in the borough and help LBN to tackle some of the key issues it is facing.
- 17.5 St William acknowledges the amendments that LBN have made to date to the emerging Local Plan in preparing a new development framework for the Borough as well as the opportunity to continue to work with LBN and other stakeholders as it proceeds with submission of the draft Local Plan. However, in its current form, St William do not consider that the Regulation 19 draft Local Plan is sound. St William would therefore welcome the opportunity to discuss their comments on the draft planning policies and relevant site allocations in further detail with Policy Officers.



Appendix 1

BROMLEY BY BOW GASWORKS – SITE LOCATION PLAN

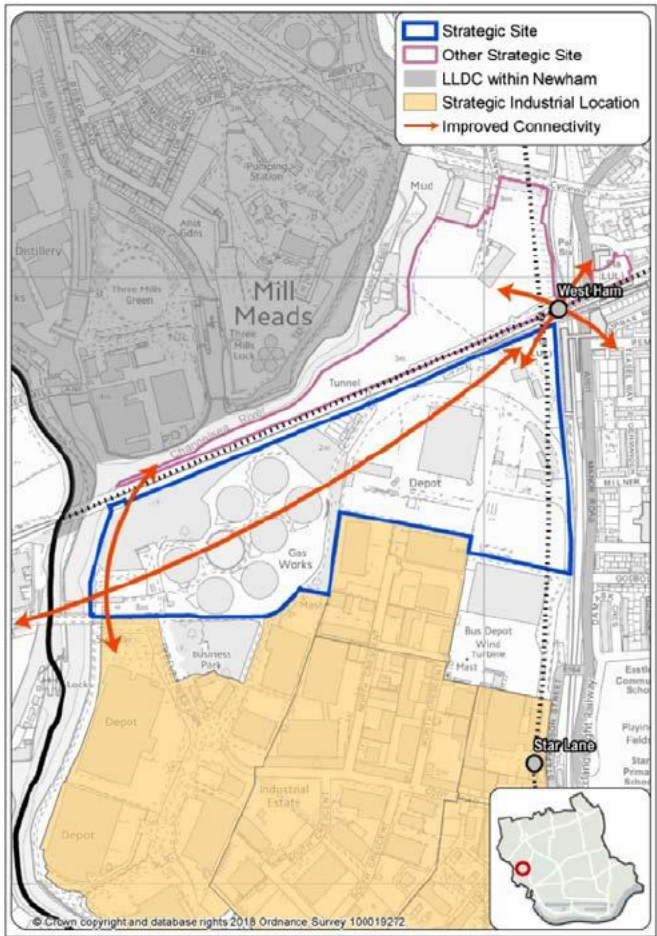




Appendix 2

LBN LOCAL PLAN 2018 – SITE ALLOCATION S11: PARCELFORCE

Strategic Site Name
Parcelforce
Strategic Site ref
S11
Community Neighbourhood
Custom House & Canning Town



Allocation including tall buildings specifications
Employment-led mixed-use (linking to existing Cody Road industrial uses) that contributes to the creation of a new neighbourhood and of a new Local Centre in the vicinity of West Ham station, along with delivery of a riverside open space. Proposals will require an assessment of, and an appropriate viable strategy for, the Grade II listed gasholders. This should take into account the impacts on the significance of the gasholders, including any effects on setting, recognise their role as heritage and character assets and their potential contribution to place making. Site access improvements will be required, including links to West Ham station, the neighbourhood beyond, to S10 and to Bromley-by-Bow. Indicative building heights of 8-12 storeys with lower development towards the west of the site sensitive to the heritage assets, and up to 19 storeys around the station, subject to addressing the sensitivity of existing homes on Manor Road.
See also Policies S1, S4, SP4, SP5, SP6, SP7, SP8, SP9, J1, J2, H3, INF1, INF2, INF4, INF5, INF6, INF7, INF8 and INF9.
Partners
GLA / private developer(s)

Further Sources of Information
<ul style="list-style-type: none">Town Centre Study 2016HRA screening report (2018);
Constraints and Other Advisory Information
<ul style="list-style-type: none">PTAL (2021): 6b – 3Listed gasholdersTPO 1101/1 Tree Preservation Order covers mature trees around the gasholdersMajor Hazards Site (former Bromley-by-Bow Gasholders) inner/middle/outer zoneAPA Tier 3Significant contaminationFlood zone 3/2Critical Drainage Area (adjacent)Licensing Saturation ZoneAQMASINC (adjacent and partial)Thames Tideway Tunnel SafeguardingParks deficiencyDelivery of Lea River Park aspirationsAirport Safeguarding: consult LCY for all works over 15m & 45m in height (see mapping)Sewers on site may not be diverted (Piling Method Statement and consultation with Thames Water required); surface water discharge expected from Channelsea River;Potential need for impact on Epping Forest SAC [SC1-5, INF2, INF6, INF7] (including through in-combination effects) to be considered through an HRA having regard to all relevant information available at the time;
Phasing
Medium to long term



Appendix 3

LBN REGULATION 19 LOCAL PLAN – SITE ALLOCATION N7.SA3

N7.SA2 Twelvvetrees Park and Former Bromley By Bow Gasworks	
Site address	Land at Stephenson Street and Bromley by Bow Gasholders
Neighbourhood	Three Mills
Site area	19.97 hectares
Public Transport Accessibility Level	0 – 6
Flood Risk	The site is shown to be at significant risk of flooding, the site is in Flood Zone 3 and Flood Zone 2, as well as at high risk if the Thames were to breach its bank and defences were to fail. There is also significant pluvial flood risk in the 0.1% AEP event.
Utilities	Underground cable route
Heritage Designations	<p>Bromley by Bow Gasholders (Grade II)</p> <p>Canning Town / Newham Way Archaeological Priority Area (Tier 3)</p> <p>In the vicinity of:</p> <p>Three Mills Conservation Area</p> <p>Engine House at West Ham Pumping Station (Grade II)</p> <p>Abbey Mills Pumping Station (Grade II*)</p> <p>Stores Building at Abbey Mills to West of Pumping Station (Grade II)</p> <p>Offices (Former Superintendent's House) at Abbey Mills (Grade II)</p> <p>Gate Lodge at Abbey Mills (Grade II)</p> <p>Gates and Gatepiers at Entrance to Abbey Mills Pumping Station (Grade II)</p> <p>Bases of Pair of Former Chimney Stacks at Abbey Mills to North West and South East of Pumping Station (Grade II)</p>

N7.SA2 Twelvvetrees Park and Former Bromley By Bow Gasworks	
Heritage Designations	<p>Ancillary Pump House To South East of Pumping Station (Grade II)</p> <p>Nos 116 to 130 (even) Abbey Lane (Grade II)</p> <p>C Station, with associated Valve House, Abbey Mills Pumping Station (Grade II)</p> <p>The Ironmongers Stone in Leather Gardens to the East of Abbey Road (Grade II)</p> <p>Tide Mill (known as the House Mill) (Grade I)</p> <p>Offices opposite Clock Mill (Custom House) (Grade II)</p> <p>Clock Mill and 3 drying kilns (Grade I)</p> <p>Paved Roadway extending from west side of House Mill to wall and gate on east side of clock mill (Grade II)</p> <p>The Still, 3 Mills Distillery (Locally Listed)</p> <p>Twelvvetrees Crescent Bridge (Grade II)</p> <p>War Memorial (Grade II)</p> <p>Statue of Corbett Woodhall (Grade II)</p> <p>Dowgate Wharf P B Burgoyne and Company Limited Warehouse (Grade II)</p> <p>The Old London Gas Museum (Locally Listed).</p> <p>Canning Town / Newham Way Archaeological Priority Area (Tier 3)</p>

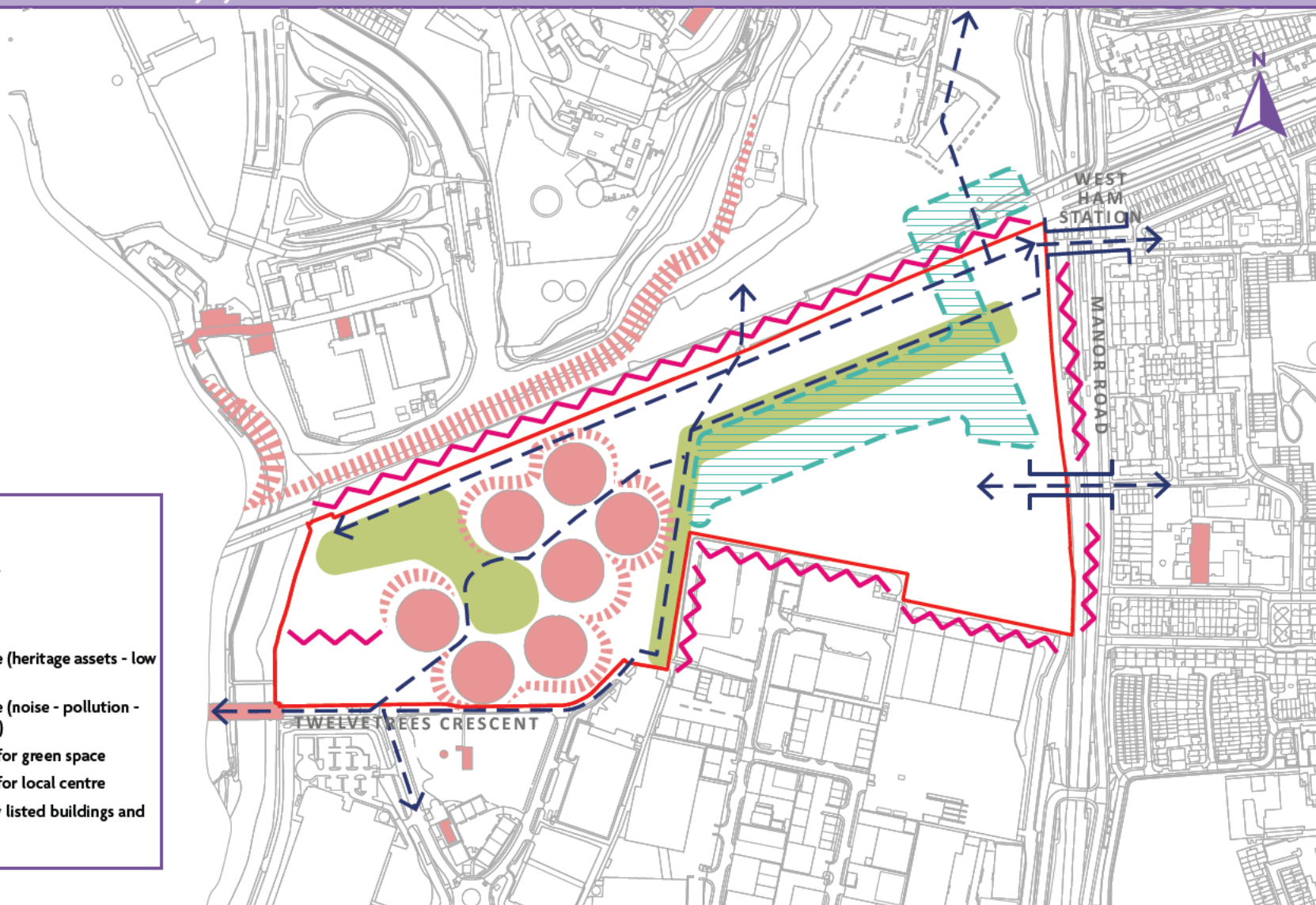
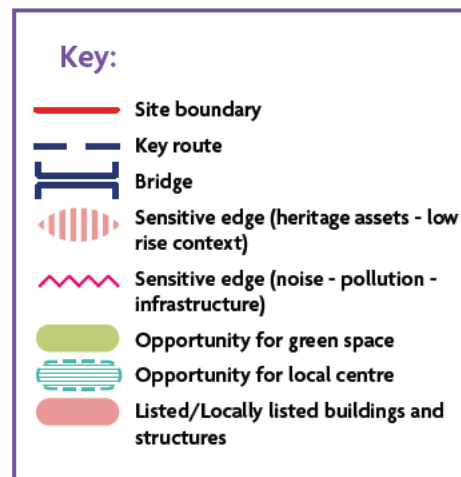
N7.SA2 Twelvetimes Park and Former Bromley By Bow Gasworks

Natural environment Designations	<p>Former Bromley-by-Bow Gasworks Site of Importance for Nature Conservation. Adjacent to the River Thames and Mill Meads Site of Importance for Nature Conservation.</p> <p>In an area of deficiency of access to all types of parks, except regional and metropolitan parks.</p> <p>Tree Protection Orders</p> <p>Air Quality Management Area</p> <p>Lee Valley Regional Park</p>
Existing uses	<p>Former gasholders and associated infrastructure, scrubland and hardstanding and four residential dwellings in the north of the of the Bromley by Gasholder site. Residential-led mixed-use development at Twelvetimes Park (former Parcelforce Depot).</p>



N7.SA2 Twelvetimes Park and Former Bromley By Bow Gasworks

Map



N7.SA2 Twelvvetrees Park and Former Bromley By Bow Gasworks

Development principles

Residential development, employment uses, main town centre uses and social infrastructure including community facilities, health centre, education uses, and open space.

The type and quantity of main town centre uses should be consistent with a local centre designation and Local Plan Policy HS1.

Development should address the need for community facilities in the area by delivering new community facilities in Twelvvetrees Local Centre, unless it can be demonstrated that the needs of the community have already been met. Development should consider of all types of community facility, as set out in the Community Facilities Needs Assessment (2022) evidence base. Any provision of community facilities should meet the requirements of Local Plan Policies SI2 and SI3.

The employment floorspace should be consistent with Local Plan Policy J1. The Gasholders portion of the site should prioritise industrial floorspace in the form of light industrial workspace suitable for micro-businesses and small and medium enterprises. There is potential for industrial floorspace to be tailored to specialist sectors including high tech media, low carbon and digital industries subject to robust market testing to demonstrate suitability.

Development on the remainder of the site should deliver the same quantity of employment floorspace as the permitted scheme.

Development proposals should ensure that flood risk is minimised, mitigated and informed by a site-specific Flood Risk Assessment, as per Local Plan Policy CE7 and informed by the Strategic Flood Risk Assessment Level 2 Site Assessment (2023).

Design principles

The site should be designed and developed comprehensively in accordance with Local Plan Policy BFN2.

Building heights should range between 9 – 21m (ca. 3 – 7 storeys) around the Gasholders and between 21 – 32m (ca. 7 – 10 storeys) in the rest of the site, with taller buildings up to 32m (ca. 10 storeys), 50m (ca. 16 storeys) and 100m (ca. 33 storeys) in defined locations to add wayfinding and with consideration given to marking the local centre. Massing should step down towards the Gasholders to sensitively integrate with the heritage assets. Buildings should set back from the watercourse to avoid overshadowing.

The Twelvvetrees Local Centre should be located in the Twelvvetrees area of the site, in proximity to West Ham Station and provide ground floor active frontages. The health centre should be located in

proximity to the Twelvvetrees Local Centre and in an accessible and prominent part of the site.

Development should conserve and enhance the Three Mills Conservation Area, the listed Gasholders and the listed buildings in the proximity of the site and their settings. Development should recognise the role of the Gasholders as heritage and character assets and their potential contribution to place making, particularly gasholder 4 due to its enhanced listing. Height, scale and massing should conserve and enhance the character of heritage assets without detracting from important landmarks and key views, including the Grade II Abbey Mills Pumping Station, the Grade II Clock Mill and Grade I House Mill as set out in the adopted Three Mills and Conservation Area Appraisal Management Guidelines.

The design and layout of the site should minimise the impact of noise from the railway lines, bus infrastructure and Pressure Reduction System on residential amenity.

The layout of the site should protect the Site of Importance for Nature Conservation, including through the provision of a local park which should optimise existing green features by protecting and enhancing the condition of the Site of Importance for Nature Conservation.

N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks

Development proposals should create stronger ecological connections to and along the Lea and Channelsea valleys and Mill Meads Site of Importance for Nature Conservation on the other side of the Channelsea River.

The design and layout of the site should take into account the waterside setting and increase access to nature and the surrounding waterways.

The design and layout of the site should establish a connected network of streets and spaces that connects to the wider street network and should create a street hierarchy. Routes through and to and from the site should improve access and connectivity to West Ham Station, N7.SA1 Abbey Mills, the Twelvetrees Local Centre and the Manor Road neighbourhood. The layout of the site should enable the continuation of the Leaway Walk through the site along Crows Road and through to N7.SA1 Abbey Mills.

Design measures should minimise exposure to poor air quality in accordance with Local Plan Policy CE6, particularly on Manor Road and the design and layout of the site take account of the underground cable routes.

The design and layout of the site should take account of risk of flooding from all sources and meet the requirements of Local Plan Policy CE7.

Sustainable drainage should be considered from the outset and meet the requirements of Local Plan Policy CE8.

Infrastructure requirements

Development should address open space deficiency by providing a consolidated local park with a minimum area of 2 hectares to service nearby residential neighbourhoods. The open space provision should prioritise community growing opportunities.

In addition to the open space provision, development should provide publicly accessible play space in the form of a Neighbourhood Equipped Area of Play as well as a Local Area for Play, which should be playable public realm. Play space should meet the requirements of Local Plan Policy GWS5.

Development should provide a new bridge connection to the entrance of West Ham Station and two footbridges across Manor Road. Development should contribute to active and public transport upgrades, including access to, and capacity at, West Ham Station.

Development should retain the Pressure Reduction System on the site.

Development on the Twelvetrees portion of the site should provide a secondary school.

Development should provide a health centre of a minimum of 1,500 sqm, designed to meet NHS needs and standards. Provision of health facilities should be subject to a needs based assessment at the time of delivery and meet the requirements of Local Plan Policy SI2.

Development should deliver an automated vacuum waste collection system to service all Local Authority Collected Waste generated by the development, in accordance with the requirements of Local Plan Policy W3.8.

Phasing and implementation

Phasing of the site should take account of the likely requirement for water supply and wastewater infrastructure upgrades through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.

The potential impact of the existing underground cable routes on design and layout should be taken into account at the pre-application stage through early engagement with National Grid.

Short to long term.



Appendix 4

BECKTON GASWORKS – SITE LOCATION PLAN
