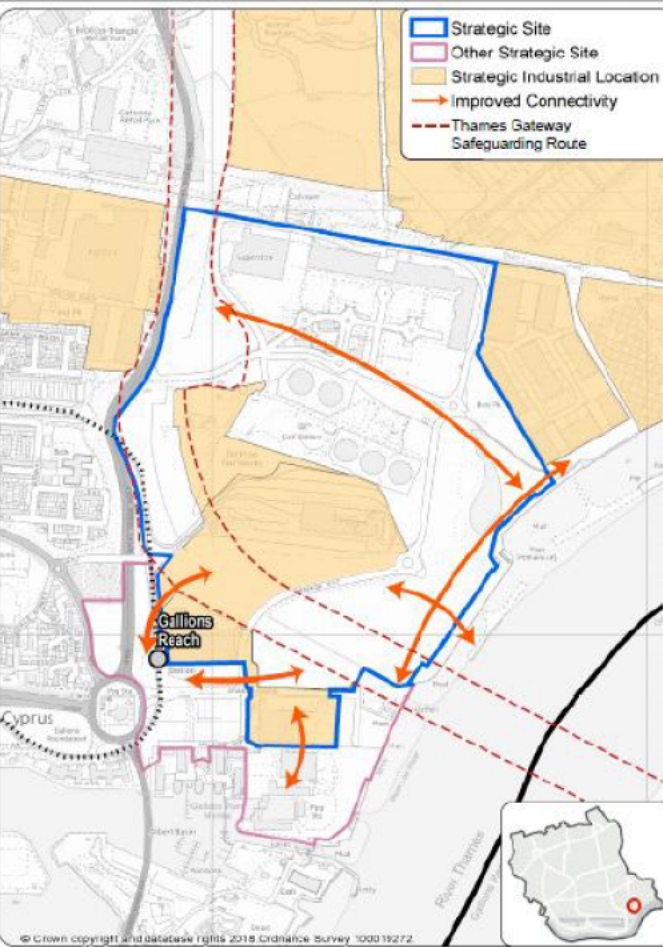


Strategic Site Name
Beckton Riverside
Strategic Site ref
S01
Community Neighbourhood
Beckton



Allocation including tall buildings specifications
Mixed-use delivering new neighbourhoods centred on a Major town centre and new station and wider transport hub, new and expanded Strategic Infrastructure and other SIL uses. The new neighbourhoods and town centre – comprising residential, pedestrian and cycle links through the site and to the river, proportionate open space and other green infrastructure that opens up riverside access including space that adds to MOL, retail, leisure, supporting community uses notably primary and secondary school provision, and other employment generating uses - will be delivered through partial Managed Release of SIL, appropriate buffering of remaining SIL, and re-formatting and diversification of the existing retail park around the new transport hub, preferably moving it south. New Strategic Infrastructure including an expanded DLR depot to meet growth needs, and river crossing(s), together with the existing CHP plant and legacy gas pressure infrastructure will be accommodated within the site, minimising its spatial impact, where possible allowing for Managed Intensification (and limited release) of associated SIL as per Policy J2 and/or development of further SIL uses. The quantum and functionality of other SIL south of the river crossing safeguarding will be protected, but could be re-located to better effect, securing improved land use transitions and integration given potential compatibility with the DLR depot, neighbouring SIL and bridge footprints. There is scope to incorporate the JWP identified strategic waste management capacity within a comprehensive redevelopment, through the inclusion of a waste facility on remaining SIL; alternatively it should be demonstrated that there is no longer a need for such a facility in that location as per INF3. Indicative building heights of 5 – 8 storeys or less, stepping up to 12 storeys at key locations and up to 19 storeys in a new town centre and around a new DLR station. See also Policies S1, S5, SP4, SP6, SP7, SP8, SP9, J1,
Partners
Private developer(s)/TfL

Further Sources of Information
Constraints and Other Advisory Information
Phasing
(Medium to) Long term



Appendix 6

LBN REGULATION 19 LOCAL PLAN – SITE ALLOCATION N17.SA1: BECKTON RIVERSIDE

N17.SA1 Beckton Riverside	
Site address	Gallions Reach Retail Park and Beckton Gas Works, Beckton, E6
Neighbourhood	Gallions Reach
Site area	84.66 hectares
Public Transport Accessibility Level	0 – 3
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	Overhead Transmission Line route On-site sewer
Heritage Designations	Beckton Archaeological Priority Area (Tier 3) Royal Docks Archaeological Priority Area (Tier 3) In the vicinity of: Gallions Hotel (Grade II* listed) The Royal Standard (Locally listed) Pumping Station Gallions Roundabout, Royal Albert Way, Beckton, London, Newham, E6 6FZ (Locally listed) The Ferndale Public House (Locally listed) 2-100 Winsor Terrace, Beckton, London (Locally listed)
Natural environment Designations	In an area of deficiency of access to all parks. Site contains two Sites of Importance for Nature Conservation (SINCs) Air Quality Management Area
Existing uses	The site contains remnants of the former Beckton gas works, the Gallions Reach shopping park and associated car parking and the Beckton DLR depot, which sits to the south of the former Beckon Gas works site, within retained Strategic Industrial Land. The site contains a range of industrial uses in the south west corner of the site also designated as a Strategic Industrial Location. The site also contains larger areas of open space adjacent to the River Thames and the A1020, including an area designated as SINC, which includes an attenuation pond serving Gallions Reach.

N17.SA1 Beckton Riverside

Map



Key:

- Site boundary
- Key route
- Sensitive edge (noise - pollution - infrastructure)
- Opportunity for green space
- Location of industrial buffering
- Strategic Industrial Location (SIL)
- Opportunity for district centre
- Opportunity for neighbourhood parade
- Phase 2
- Safeguarding route
- DLR extension
- Proposed DLR station

N17.SA1 Beckton Riverside

Development principles

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

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
- release of the land safeguarded for a river crossing crossing (by the Secretary of State, following recommendation by Transport for London and the Mayor of London).

Applications for the development of this site, and their phasing, should consider and relate to the range of potential transport infrastructure changes on this site, in line with the principles outlined below.

Until the DLR construction contract is let or a similarly transformative (as confirmed by Transport for London) public transport intervention has confirmed funding:

- Transformative development activity should only occur in the southern section of the site within easy walking distance of Gallions Reach DLR station, which can be reached via a pleasant and safe route.

- Significant development and redesign of Gallions Reach Retail Park should not occur and applications on that part of the site will be assessed in accordance with Local Plan Policy HS1.
- The employment uses should be consistent with Local Plan Policy J1 and prioritise industrial floorspace, in particular transport and utilities infrastructure and large scale industrial uses with a focus on logistics and warehousing and clean, green and low carbon industries. Employment uses outside of the Strategic Industrial Locations should be for light industrial uses.
- A neighbourhood parade should be provided at a point between the location of the proposed new district centre and Albert Basin Local Centre, in line with the requirements in Local Plan Policy HS1.1.
- Development should address the need for community facilities in the area by delivering community facilities in the new neighbourhood parade, unless it can be demonstrated that the needs of the community have already been met. Development should consider 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 health centre should be located in the neighbourhood parade and the primary school and associated early years' provision should be located in the southern part of the site, in close proximity to the new developments to the south of site.
- Development should deliver the Local Park, the continuation of the Thames Path through the site, an enhanced route to Gallions Reach DLR station and the extension of the Greenway into the site at the earliest opportunity.

Once the DLR construction contract is let or a similarly transformative (as confirmed by Transport for London) public transport intervention has confirmed funding:

- Transformative development activity on the remainder of the site can commence, of a scale which reflects the improved transport access.
- A new town centre should be delivered, consistent with a district centre designation. There is an opportunity to provide the quantity and scale of uses consistent with a major centre, if supported by the findings of an up-to-date and robust Marketing Strategy, in line with the requirements in Local Plan Policy HS2.

N17.SA1 Beckton Riverside

- The new town centre must be located in close proximity to the DLR station and be delivered in line with the requirements in HSI.2.
- The employment uses should be consistent with Local Plan Policy J1 and prioritise industrial floorspace in the Strategic Industrial Locations, in particular transport and utilities infrastructure and large scale industrial uses with a focus on logistics and warehousing and clean, green and low carbon industries. Smaller-scale office uses should be prioritised in the new district centre.
- Development should address the need for community facilities in the area by delivering new community uses in the new town centre, unless it can be demonstrated that the needs of the community have already been met. Development should consider 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.
- Any expanded health hub or sports and recreation use should be located in the most accessible part of the site, within the town centre. The secondary school should be located in close proximity to the new town centre and public transport.

All 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. The masterplan must demonstrate that the proposed development is designed with suitable flexibility to accommodate the full range of transport options under consideration by Transport for London at the time of application and is phased to ensure sufficient transport infrastructure will be in place to support the development as it is occupied.

In the southern part of the site, building heights should range between 21-32m (ca.7-10 storeys) with taller elements up to 40m (ca. 13 storeys) in limited locations in the areas closest to Gallions Reach DLR station and the riverside, with consideration given to marking the neighbourhood parade.

In the northern part of the site, and once the DLR construction contract is let or a similarly transformative (as confirmed by Transport for London) public transport intervention has confirmed funding, building heights should range between 21-32m (ca.7-10 storeys) with taller elements up to

50m (ca. 16 storeys) in limited locations at the new town centre and DLR station.

Buildings should set back from the watercourse to avoid overshadowing impact.

A buffer of employment uses should be provided between residential uses and the Strategic Industrial Location both within and adjacent to the site allocation. Non-residential stacked industrial buildings are considered to be the most appropriate typology to provide a buffer. The design and layout of the site should consider public realm enhancements and avoid habitable rooms and amenity spaces facing industrial uses. Separate HGV and pedestrian access should be designed to avoid conflicts between different uses, particularly where servicing the buffer building.

The new town centre should be designed to significantly increase accessibility by public transport and walking and cycle routes in order to reduce car dependency and parking. The new town centre should provide active frontages and quality public realm, including a new public square.

N17.SA1 Beckton Riverside

Proposals should preserve the green link between the river and green infrastructure along Royal Docks Road. Links from the site to the Sites of Importance for Nature Conservation to the north of Atlantis Avenue and to the north of Armada Way should be developed.

Design and layout of the site should establish a connected network of streets and spaces that connects to the existing street network and should create a street hierarchy. Routes through, and to and from, the site should improve access and connectivity to the existing residential neighbourhoods within Beckton, the new residential neighbourhood at Gallions Reach, Gallions Reach DLR Station and the banks of the River Thames.

Development should enable the continuation of the Thames Path through the site, the extension of the Greenway into the site and should aid connectivity between the Greenway and the River Thames.

Development should ensure legibility and connectivity across the new rail line.

Design measures should minimise exposure to odour from Beckton Sewage Treatment Works and poor air quality on Royal Docks Road.

The layout of the site should take account of the noise contours across the site from London City Airport and design measures should minimise exposure from the airport.

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.

Development should deliver the relevant site-specific integrated water management interventions outlined in section 1.3 of the Royal Docks and Beckton Integrated Water Management Strategy.

The design and layout of the site should take account of the existing on-site sewer and overhead transmission line route.

Infrastructure requirements

Development should support and enable the delivery of a new DLR route and station, through participating in a joint stakeholder approach with landowners, infrastructure providers and authorities, and improved capacity at Gallions Reach DLR.

Development proposals within the part of the site safeguarded for the Thames Gateway Bridge must be referred to Transport for London and the Mayor

of London for confirmation it will not preclude the delivery of a road crossing, until the safeguarding is removed as directed by the Secretary of State, following recommendation by Transport for London and the Mayor of London.

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.

Until the DLR construction contract is let or a similarly transformative (as confirmed by Transport for London) public transport intervention has confirmed funding:

- Development should provide a new primary school, with early year's childcare provision of the scale required to meet projected need for school places in accordance with Local Plan Policy SI4 and a health centre 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 address existing open space deficiency by providing a consolidated Local Park of a minimum of 2 hectares and Pocket Parks to service nearby residential

N17.SA1 Beckton Riverside

neighbourhoods. The open space provision should prioritise the provision of community growing opportunities. In addition to the open space provision, development should provide publicly accessible play space in the form of a Local Area for Play a Locally Equipped Area for Play and a Neighbourhood Equipped Area of Play.

- Development should provide a sports-lit MUGA, meeting the requirements of Local Plan Policy GWS5.

Once the DLR construction contract is let, or a similarly transformative (as confirmed by Transport for London) public transport intervention has confirmed funding, development should deliver:

- A new leisure centre in the district centre. Provision should meet the needs identified in the Built Leisure Needs Assessment (2024) and be delivered in accordance with the requirements of Local Plan Policies SI2 and SI3. A new leisure centre at this site is not required if the built leisure provision for the area has already been delivered at N11.SA1; and
- A secondary school of the scale required to meet projected need for school places. Open space for the secondary school can be split between the core school site requirements

and hard outdoor PE provision, which should be provided on the school site, and soft outdoor PE provision which can be met in another part of the allocation but within a 10 minute walk of the school. Both the hard and soft outdoor PE provision should be accessible to the wider community; and

- An expanded health hub designed to meet NHS needs and standards for the projected population; and
- safeguarded space for River Pier Landing Facilities and a River Pier.

Phasing and implementation

Medium to long term.

Phasing of the site should reflect the development and design principles above and respond to the proposed changes to transport infrastructure.

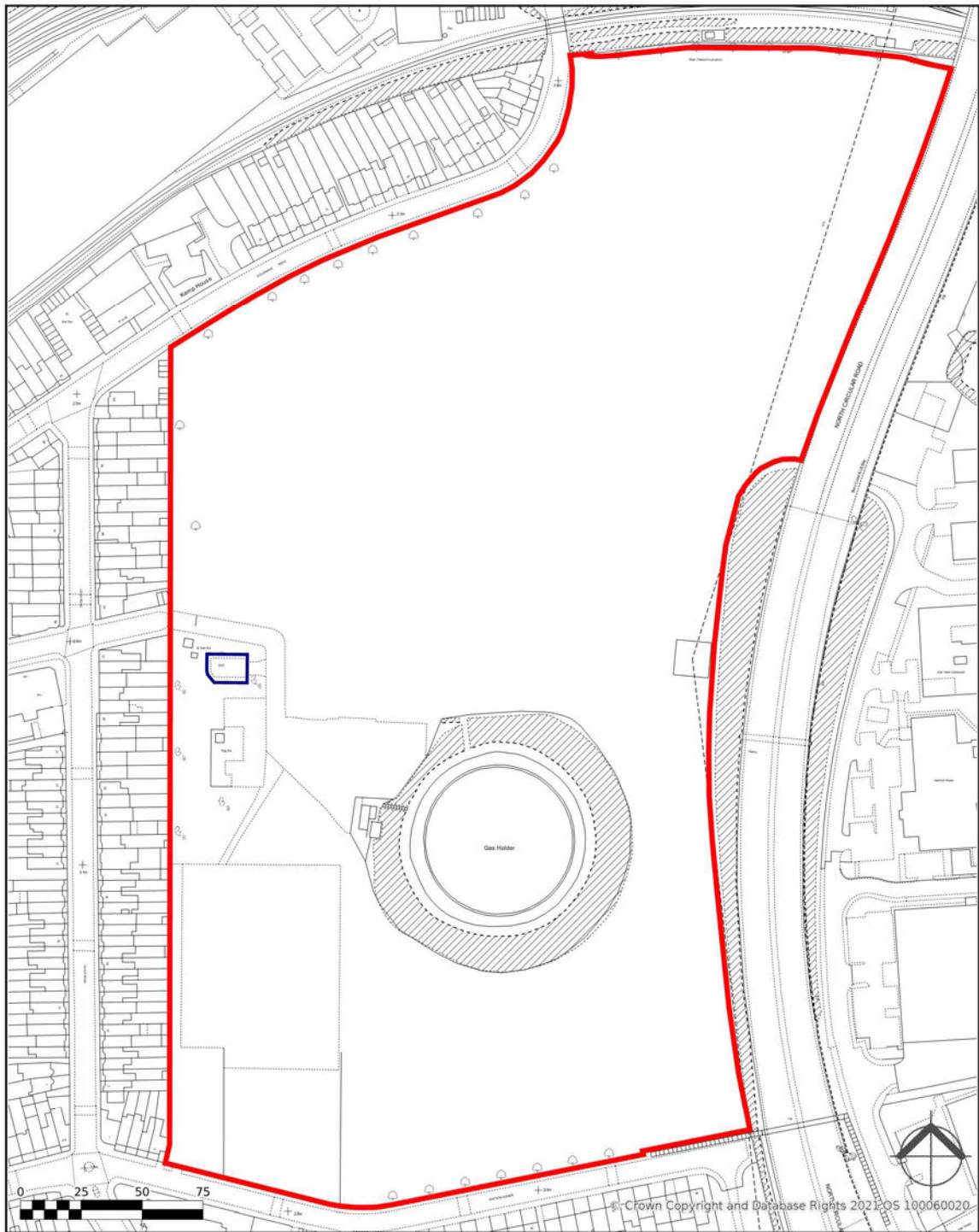
Phasing of the site should take account of the likely requirement for water supply and wastewater infrastructure upgrades through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.

The potential impact of the existing overhead transmission line route on design and layout should be taken into account at the pre-application stage through early engagement with National Grid. Impact from the existing on-site sewer on design and layout should be taken into account in pre-application stage through early engagement with Thames Water.



Appendix 7

EAST HAM GASHOLDERS – SITE LOCATION PLAN



Plotted Scale - 1:2,500



Appendix 8

REGULATION 19 LOCAL PLAN – SITE ALLOCATION N13.SA3 EAST HAM GASHOLDERS

N13.SA3 Former East Ham Gasworks	
Site address	Former East Ham Sports Ground Leigh Road.
Neighbourhood	East Ham
Site area	10.3 hectares
Public Transport Accessibility Level	0 – 3
Flood Risk	The site is shown to be at significant risk of flooding in Flood Zone 3 and Flood Zone 2, as well as being at pluvial flood risk in the 1% and 0.1% AEP events and also being at risk if the Thames were to breach its bank and defences were to fail.
Utilities	Overhead Transmission Line
Heritage Designations	River Roding Archaeological Priority Area (Tier 3)
Natural environment Designations	<p>In an area of deficiency of access to all types of Parks, except the southern half of the site which is within the catchment for Barking Road Recreation Ground Local Park and of under provision to publicly accessible open space by head of population in 2038.</p> <p>Metropolitan Open Land and Former Leigh Road Sports Ground Sites of Importance for Nature Conservation</p> <p>Air Quality Management Area</p> <p>Source Protection Zone 2</p>
Existing uses	Former gasholders and associated infrastructure and open space currently inaccessible to the public, which includes disused playing pitch.



N13.SA3 Former East Ham Gasworks

Map



Key:

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

N13.SA3 Former East Ham Gasworks**Development principles**

Residential, open space and community facility.

Development should take place on the part of the site outside the Metropolitan Open Land. Development should protect the openness of the adjacent Metropolitan Open Land and maintain the site's role in providing a continuous chain of open space along Newham's eastern boundary. Development should explore the restoration of the Back River.

Development should protect, enhance and bring back into public use the disused sports pitches in the Metropolitan Open Land in accordance with Local Plan Policy GWS1.

Development should address the need for community facilities by delivering a new community facility with a local neighbourhood appeal (smaller than 1,000 sqm Gross Internal Area), unless it can be demonstrated that the needs of the community have already been met. Development should consider of all types of community facility, as set out in the Community Facilities Needs Assessment (2022) evidence base. Any provision of community facilities should meet the requirements of Local Plan Policies SI2 and SI3.

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.

Mid-rise residential buildings below 21m (ca. 7 storeys) are the most appropriate form of development which sensitively integrate with the scale and massing of the existing urban fabric. Massing should step down towards the east of the site to sensitively integrate with the existing two storey terraces on Leigh Road.

The design and layout of the site should establish a connected network of streets and spaces and that connects into the existing street network and should create a street hierarchy. Routes to, from and through the site should improve access and connectivity to and along the River Roding and through the site from Southend Road through to Watson Avenue. The community facility should be located where there are good connections to the existing street network and in proximity to the open space.

The layout of the site should protect the Site of Importance for Nature Conservation.

Design measures should minimise exposure to poor air quality in accordance with Local Plan Policy CE6.

The design and layout of the site should take into consideration the electricity pylons on the eastern boundary of the site and minimise the impact of noise from any required Pressure Reduction System on residential amenity.

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.

N13.SA3 Former East Ham Gasworks**Infrastructure requirements**

Development should address existing open space deficiency by retaining the Metropolitan Open Land and make it publicly accessible.

The open space provision should prioritise community growing opportunities as well as publicly accessible play space in the form of a Locally Equipped Area for Play. Development should also provide play space in the form of a Local Area for Play which should be playable public realm. Play space should meet the requirements of Local Plan Policy GWS5.

Development should retain the gas governor on site.

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 overhead transmission line on design and layout should be taken into account at the pre-application stage through early engagement with National Grid.

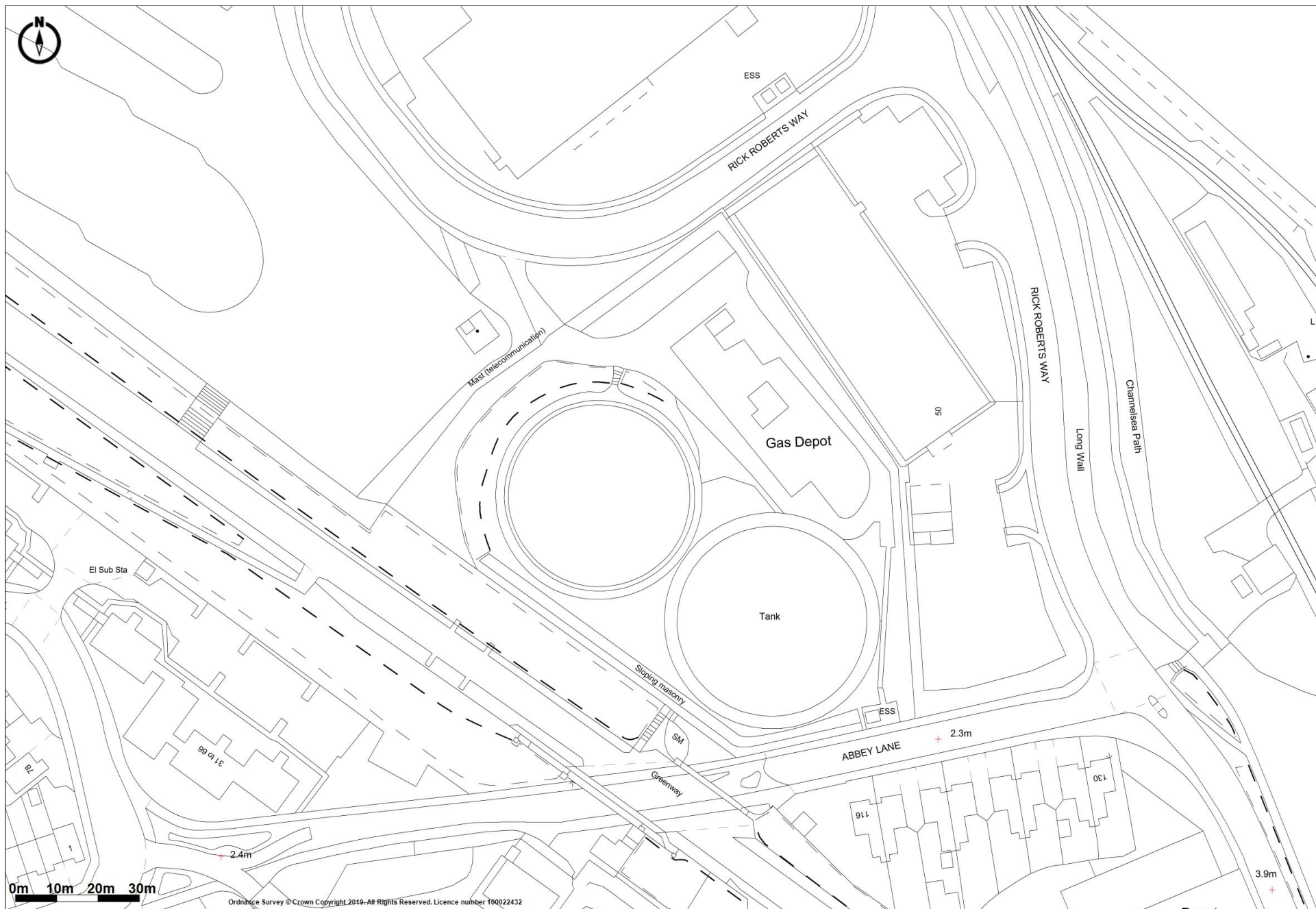
Medium to long term





Appendix 9

RICK ROBERTS WAY GASWORKS – SITE LOCATION PLAN

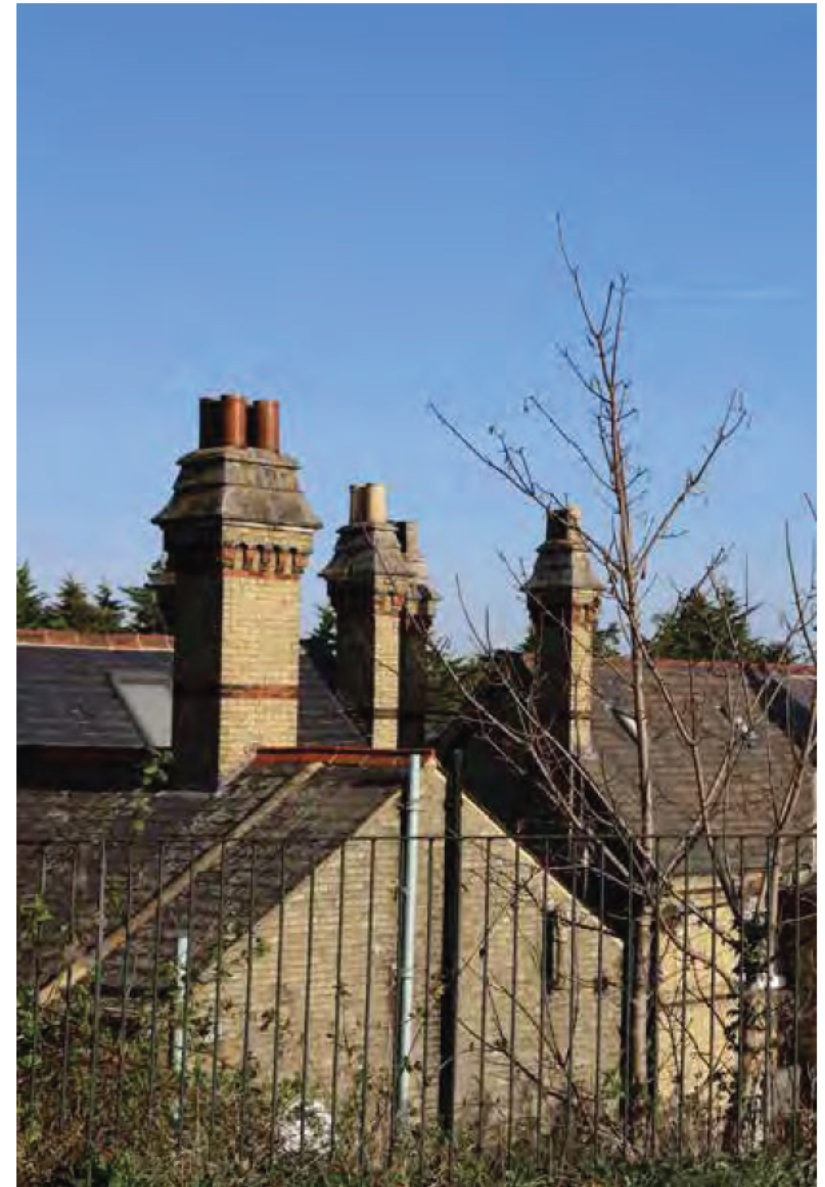




Appendix 10

LBN REGULATION 19 LOCAL PLAN – SITE ALLOCATION N8.SA7: RICK ROBERTS WAY

N8.SA7 Rick Roberts Way	
Site address	Land between Rick Roberts Way to the north and Greenway to the south
Neighbourhood	Stratford and Maryland
Site area	4.3 hectares
Public Transport Accessibility Level	2 – 5 2 – 6 (2031)
Flood Risk	The site is shown to be at significant risk of flooding in Flood Zone 2 and Flood Zone 3, as well as being at pluvial flood risk in the 0.1% AEP event and also being at risk if the Thames were to breach its bank and defences were to fail.
Heritage Designations	River Lea Archaeological Priority Area (Tier 3) In the vicinity of: Three Mills Conservation Area Sugar House Island Conservation Area 116 – 130 Abbey Lane (Grade II) Gate Lodge at Abbey Mills (Grade II) Former Superintendent House at Abbey Mills (Grade II) Chimney Stacks at Abbey Mills (Grade II) Abbey Mills Pumping Station (II*)
Utilities	Underground cable route
Natural environment Designations	Air Quality Management Area In an area of deficiency of access to all types of parks, except metropolitan and small parks and of under provision to publicly accessible open space by head of population in 2038. Adjacent to Greenway Site of Importance for Nature Conservation and Metropolitan Open Land
Existing uses	Temporary community facility, vacant land, storage use and gasholder infrastructure.

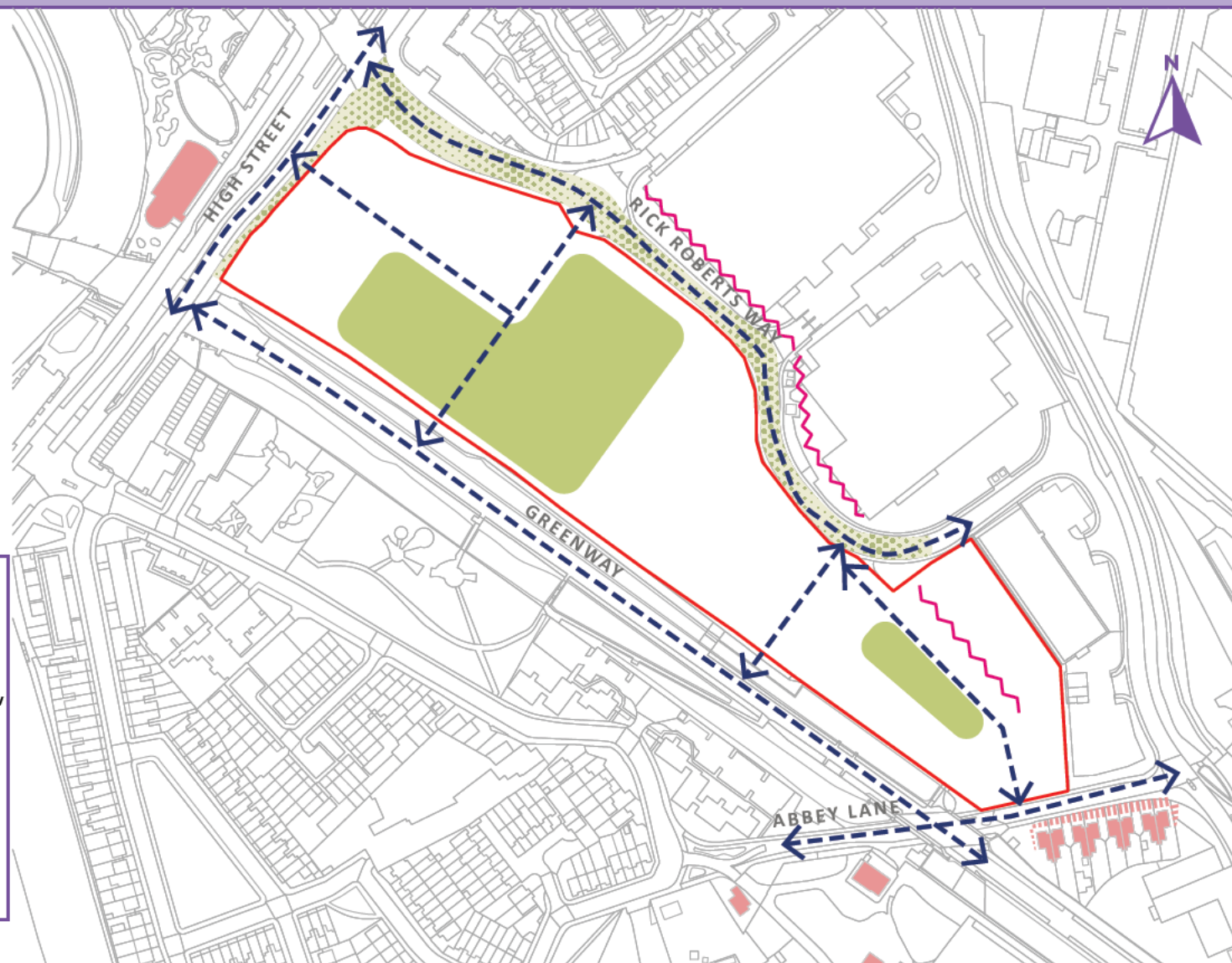


N8.SA7 Rick Roberts Way

Map

Key:

- Site boundary
- - - Key route
- ▨ Sensitive edge (heritage assets - low rise context)
- ~ Sensitive edge (noise - pollution - infrastructure)
- Opportunity for green space
- ▨ Opportunity for public realm improvement
- Listed/Locally listed buildings



N8.SA7 Rick Roberts Way

Development principles

Residential, employment uses, sports and recreation uses, education and open space.

The employment use should be consistent with Local Plan Policy J1 and should prioritise light industrial floorspace.

Development should protect and enhance existing sports and recreation uses in accordance with Local Plan Policies SI1 and SI3.

The 1.2 hectares of open space should be provided on the publicly owned land.

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 21 – 32m (ca. 7-10 storeys) with taller buildings up to 50m (ca. 16 storeys). Massing should step down towards the east to sensitively integrate with the low rise context of the listed cottages on Abbey Lane.

The design and layout of the site should establish a connected network of streets and spaces that connects to the existing street network and should create a street hierarchy. The design and layout of the site should provide new and improved routes for walking and cycling including two routes either side of the school site to connect the Greenway and Rick Roberts Way. Improvements should also be made to provide a fully accessible connection between Abbey Lane and the Greenway and the stairs in the south eastern corner of the site.

Development should provide a consistent frontage onto the Stratford High Street and the junction should be safe and welcoming. Development should improve walking and cycling conditions and the public realm on Rick Roberts Way, the Stratford High Street and Abbey Lane. Development should reinforce the legibility of the existing street hierarchy through appropriate scale and massing on primary and secondary streets, creating frontages to frame Rick Roberts Way and the Stratford High Street.

Development should conserve and enhance the significance of the listed cottages to the south east of the site and the character of the Three Mills conservation area. Height, scale and massing should avoid impact on important landmarks and key views set out in the Three Mills Conservation Area Appraisal and Management Plan and the Sugar

House Lane Conservation Area Appraisal and Management Plan.

Design measures should ensure an air quality neutral approach and minimise exposure to poor air quality, particularly on Rick Roberts Way and the Stratford High Street.

The design and layout of the site should minimise the impact of noise from the Pressure Reduction System on residential amenity and take into account the underground cable route.

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

N8.SA7 Rick Roberts Way

Infrastructure requirements

Development should address existing open space deficiencies by providing a small open space with a minimum of 1.2 hectares. In addition to the open space, development should provide publicly accessible play space in the form of a Locally Equipped Area for Play and a Local Area for Play, which should be playable public realm. Development should provide a sports-lit Multi-Use Games Area unless delivered at N8.SA5 Stratford Town Centre West. Play space should meet the requirements of Local Plan Policy GWS5.

Development should meet the need for school places by providing a Special Educational Needs and Disability school on the publicly owned land in accordance with Local Plan Policy SI4.

Development should deliver sports hall provision. Provision should meet the needs identified in the Built Leisure Needs Assessment (2024) and be delivered in accordance with the requirements of Local Plan Policies SI2 and SI3.

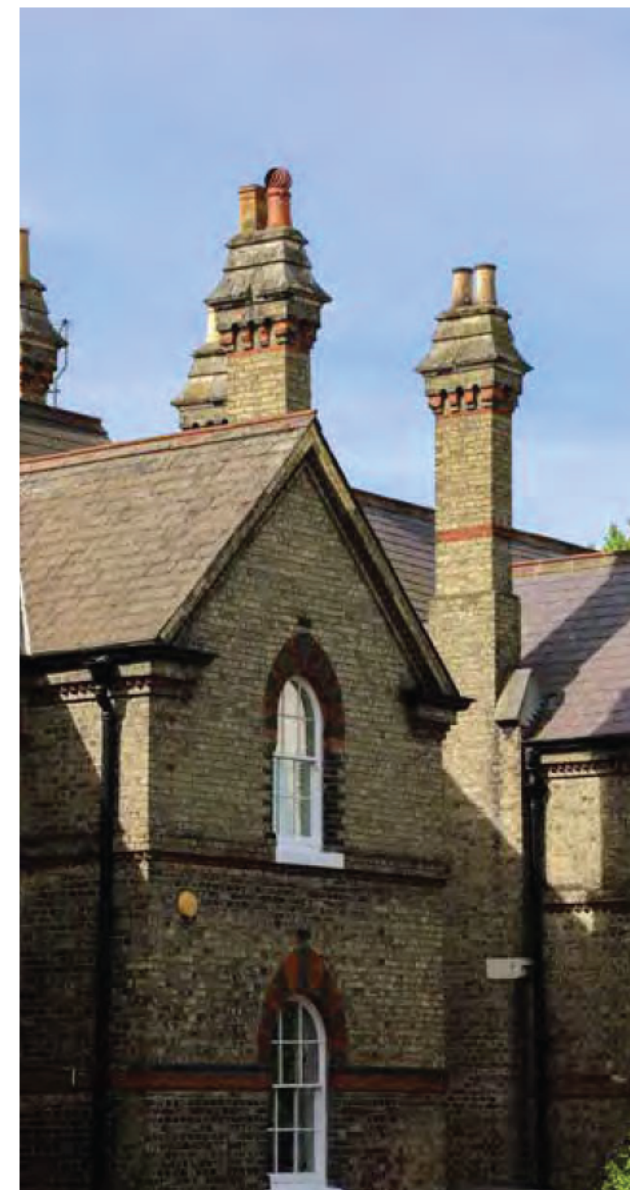
The Pressure Reduction Station, electricity mast and sub-station should be retained or re-provided on the site. The district heating network connection to the north west of the site should be retained.

Phasing and implementation

Phasing of the site should take account of the likely requirement for a water supply infrastructure upgrade 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 underground cable route on design and layout should be taken into account at the pre-application stage through early engagement with National Grid.

Medium term.





Appendix 11

GASHOLDER SITES

Appendix 11 – Gasholder Sites

- 1.1 This Appendix sets out further detail on the physical characteristics of gas holder sites and planning policy which relates to them.

Physical Characteristics

- 1.2 Gas Holder sites were used to store large cubic volumes of low-pressure gas. Gas Holder sites vary in size but contain very limited built floorspace. They support virtually no direct jobs as the workforce is located off-site in offices. Where jobs are supported on Gas Holder sites, these are often at a low intensity not associated with the Gas Holder operation.
- 1.3 Gas Holder sites are potential hazards defined by the Health and Safety Executive. They can also be ornate structures of heritage value, some have also been listed. The Motspur Park holders however are of low value and are not a designated (or undesignated) heritage asset. The structures are alien metal forms in a residential and landscaped character area.
- 1.4 The exceptional nature of Gas Holder sites are the abnormal costs which are significant and will remain unknown until planning permission has been granted.
- 1.5 The investment risk profile of Gas Holder sites is significantly higher than traditional brownfield sites, as much of the abnormal cost is experienced at the start of the project over a longer period of time. It is therefore important that impediments to delivery of these sites are removed to incentivise delivery as a strategic source of housing, and to maximise output to overcome viability constraints.
- 1.6 The key upfront abnormal considerations for Gas Holder sites can be summarised below:
- The need for substantial decontamination. To improve the environmental condition of the land and make it suitable for a mixed-use development it will be necessary to address the contamination of the soil and groundwater. Whilst some of the materials from gas storage may have been recycled on sites, some may have been buried in underground wells, pipes and beds and will require removal.
 - Rationalisation and upgrading of the existing gas infrastructure, this includes the pressure reduction stations, maintenance equipment and underground gas mains.
 - Demolition of the existing holders and associated infrastructure.
 - Removal and rationalization of underground structures and obstructions.
 - Finance holding costs (due to the need to undertake Holder on site in a sequential fashion, including regulatory approval, post grant of planning permission and prior to construction commencing)
- 1.7 As a result of these constraints the following development principles can be deduced.

- Gas Holder sites are former utilities sites which have exceptional re-development characteristics.
- The delivery of Gas Holder sites is challenging due to high abnormal costs associated with remediation and rationalisation of existing gas apparatus, which in turn present significant development risks and complexity.
- High density, high value development is required to ensure that a viable development can be delivered when accounting for the high abnormal costs.
- Mixed use development can ensure the success of residential-led schemes, however, the exact uses and quantum of non-residential floorspace needs to be compatible with residential uses and balanced against the viability consideration and other delivery objectives.
- The requirement to achieve a policy compliant affordable housing offer is a challenge in its own right, but significantly at gas sites, and such circumstances can stall gas sites coming forward for development without appropriate consideration of the site constraints.
- There are precedent examples of gas sites across London where policy flexibility has been applied to ensure that a successful development can be brought forward.

Gas Holder Planning Policy

1.8 We consider below the bespoke policy relevant to Gas Holder sites.

The Framework

- 1.9 The Framework (the NPPF 2023) sets out the Government’s planning policies for England and how these are expected to be applied. It is a material consideration which carries significant weight when considering how to formulate and apply planning policy to planning decisions.
- 1.10 The NPPF contains national policy on a range of topic areas including decision making, viability, affordable housing, design, open space, heritage, and the economy. The “presumption in favour of sustainable development” remains the central tenet of the Framework.
- 1.11 Significantly, the Framework refers specifically to the need to deliver more homes, at a greater density, on brownfield land, especially contaminated land.
- 1.12 This is, in part, a reflection of the work that utility companies have undertaken with Government to inform a policy framework which supports and promotes the remediation and repair of heavily contaminated sites. This is important due to the “Do Nothing” scenario which is a real consideration whereby the abnormal cost of remediation and repair are unfunded. In such cases, the Site will remain as existing in situ, as has been evidenced across much of the UK, unless higher value uses are proposed to cross subsidise the process.

- 1.13 The Government’s objective of “significantly boosting the supply of homes” is a national policy objective of the Framework, recently supported by the ambition to deliver 300,000 new homes per year.
- 1.14 The Framework promotes an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. The Framework sets out the Government’s approach to brownfield contaminated land, giving “substantial weight” to its redevelopment and remediation at Paragraph 124 Part (c), which is set out below:-
- “(c) give 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”*
- 1.15 It also promotes and supports the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.
- 1.16 National planning policy promotes the redevelopment of Gas Holder site for housing, at optimal densities giving substantial weight to the value of using suitable brownfield land for new homes.

London Plan

- 1.17 The adopted London Plan carries the full weight of the development plan. It is consistent with the Framework. Importantly specific consideration has been applied to Gas sites. The reason for this is that SGN and Berkeley were able to work with the GLA to examine the evidence base behind the challenges of delivering gas Holder sites. The background evidence base, as well as the determination of live planning applications considered by the GLA led to the formation of policies. These policies have been subject to extensive and detailed consultation, review and examination in public.
- 1.18 Three principal issues informed the policy debate and led to surplus utility sites being included in the strategic supply of housing in London under Policy H1 and Footnote 59.
- 1.19 We consider the policy discussions below and the matters that informed Gas sites being treated as an exception under London Plan Footnote 59.

Are Gas sites subject to abnormal costs?

- 1.20 The evidence base to the London Plan recognises that remediation costs of Gas sites are significant. The London Industrial Land Demand Study 2017 explicitly recognises the limitation of land contamination at Gas sites, its cost, and the requirement to incentivise development through higher land values. It confirms the following:

“Land contamination can constrain the future of such land (e.g. for former gas holder sites): decontamination Holder are costly and can require the incentive of higher land values (e.g. from residential developments)”.

- 1.21 The abnormal costs will be experienced at the very start of the project, which can also result in long lead in times as the environmental planning considerations are addressed (remediation, water sampling etc).
- 1.22 Decontamination costs were considered at the Tower Hamlets Local Plan 2031 Examination in Public (September 2018). The Council's own evidence base to the examination included the Tower Hamlets Local Plan Viability Assessment 2018 Paragraph 7.17. This considered three Gasholder sites within its borough concluding that "we have included an allowance of £3.2m/ha for the sites, based on our experience of the costs associated with decontamination of similar Gas Holder sites in London". In SGN and Berkeley's experience this is a conservative figure as it relates only to decontamination rather than other costs such as the need to relocate and upgrade gas infrastructure on site to facilitate redevelopment; rationalise high pressure gas mains; the erection of new Pressure Reduction Stations; and the removal of gasholder structures and redundant underground pipes. However, it remains a significant cost.
- 1.23 Notwithstanding this, Tower Hamlet's own viability evidence found that the three Gas sites could not deliver policy compliant levels of affordable housing (an average maximum reasonable affordable housing provision of 20% was evidenced across the three sites). To ensure deliverability for the purposes of the local plan Tower Hamlets found it necessary to indicate lower levels of affordable housing or ensure policy flexibility through increased density and housing mix to achieve policy compliant levels of affordable housing.

Can gas Holder sites contribute strategically to the delivery of housing in the capital. If they can, should they be subject to affordable housing thresholds and review mechanisms which apply to industrial sites that are brought forward for housing?

- 1.24 The London Plan categorises Gas sites as surplus utility sites, and these sites are identified as a strategic source of housing.
- 1.25 Policy H1 Increasing housing supply is the principal housing delivery policy of the London Plan. Its purpose is 'increasing housing supply'. Part B(2) states that Boroughs should "optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity...".
- 1.26 The policy lists six strategic sources of housing capacity. Sub paragraph (d) is relevant to gas Holder sites and identifies them for redevelopment as a strategic source of housing: "d) the redevelopment of surplus utilities and public sector owned sites."
- 1.27 Surplus utilities are distinguished from other categories of sites. For example, industrial sites planned for release under Policies E4, E5, E6 and E7 are a separate sub-category at Policy H1(b)(2)(f).
- 1.28 Utility sites are also considered in the Strategic Housing Land Availability Assessment 2017 (SHLAA) which forms part of the evidence base for the new London Plan. The SHLAA confirms that "surplus utilities sites" have been retained within the 10-year housing target where promoted for redevelopment unlike designated industrial sites.
- 1.29 To incentivise and de-risk the delivery of Gas sites, the London Plan exempts these sites from the London wide affordable housing requirement for industrial sites. Instead, it recognises that

Gas sites will have a lower affordable threshold and exempts them from late-stage reviews where challenges of delivery are evidenced.

- 1.30 Footnote 59 of the new London Plan specifically sets out what tests surplus utility sites should undertake to demonstrate the challenges of delivery. Footnote 59 recognises the substantial costs of preparing surplus utilities sites for development. It therefore (inter alia) confirms that surplus utility sites can be subject to the 35% affordable housing fast track approach, conditional upon evidence being provided of extraordinary costs.

“It is recognised 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”¹.

- 1.31 Gas sites are therefore capable of having a 35% threshold level of affordable housing applied and follow the Fastrack Route. The Mayor requires the demonstration of decontamination requirements, and that enabling or remediation costs must be incurred to bring surplus utility sites forward for development.
- 1.32 In accordance with the approach taken across London to date, Berkeley will evidence the substantial decontamination, enabling and remediation costs during the pre-application process.

Can gas Holder sites viably contribute towards London’s industrial floorspace capacity?

- 1.33 The challenges of delivery of Gas sites has been reflected in the economic policies of the London Plan.
- 1.34 Supporting text to Policy E4 (Land for Industry, Logistics and Services to Support London’s Economic Function) previously confirmed that the principle of no net loss of industrial floorspace capacity does not apply to sites previously used for utilities infrastructure which are no longer required e.g., surplus utility sites, because of their delivery challenges.

“The principle of no net loss of floorspace capacity does not apply to sites used for utilities infrastructure or land for transport functions which are no longer required”².

- 1.35 As a result of the Secretary of State’s decision to direct the Mayor to remove Policy E4(C) which sought, in overall terms across London, no net loss of industrial floorspace capacity (and operational yard space capacity) within designated SIL and LSIS, the supporting text to this policy has also been deleted (former paragraph 6.46-6.4.11).
- 1.36 Paragraph 6.4.8 was also removed due to the blanket approach. The London Plan objective that Gas sites should not provide industrial capacity was however a principle tested through the London plan review and remains an accepted policy principle.

¹ London Plan Footnote 59

² London Plan (former) paragraph 6.4.8

Conclusion

- 1.37 The London Plan allocates Gas sites as a strategic sources of housing supply. The London SHLAA relies upon such sites for its 10-year housing target. Gas sites are considered separately from industrial sites. The challenges of delivery result in their exceptional consideration within the Plan. They are expected to deliver a lower threshold of affordable housing, exempt from a late-stage review mechanism. The economic policies of the Plan recognise that gas Holder should not provide industrial floorspace.



Appendix 12

GENERAL POLICIES – TRACK CHANGES

Appendix 12: General Policies – Suggested amendments

Policy Reference	Policy Name	The Berkeley Group proposed amendments to draft policy wording
Building a Fairer Newham		
BFN1	Spatial strategy	<p>5. Development will protect and enhance existing parks and social infrastructure and support the creation of new parks and social infrastructure by requiring the delivery of:</p> <ul style="list-style-type: none"> a. new or re-provided community facilities on suitable site allocations in areas with a deficiency in access to community facilities and by directing additional community facilities to the borough's network of town centres and accessible, neighbourly locations to deliver a network of well-connected neighbourhoods; and b. new schools on N2.SA1 Silvertown Quays, N2.SA3 Connaught Riverside, N2.SA4 Thameside West, N4.SA4 Royal Road, N8.SA7 Rick Roberts Way and N17.SA1 Beckton Riverside site allocations, subject to a needs based assessment at the time of delivery; and c. new health centres on N1.SA2 Rymill Street, N2.SA4 Thameside West, N5.SA1 Custom House – Land surrounding Freemasons Road, N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks, N8.SA1 Stratford Central, N8.SA9 Pudding Mill and N17.SA1 Beckton Riverside site allocations and in the N14 Green Street Neighbourhood, subject to a needs based assessment at the time of delivery; and d. re-provided health centres on N10.SA4 Balaam Street Surgery Complex, N11.SA1 East Beckton Town Centre, N14.SA2 Shrewsbury Road Health Complex and N15.SA1 Lord Lister Health Centre site allocations; and e. new open space on the majority of site allocations, with new Local Parks of at least 2ha required on the N2.SA1 Silvertown Quays, N2.SA4 Thameside West, N4.SA4 Limmo, N7.SA1 Abbey Mills, N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks and N17.SA1 Beckton Riverside site allocations, the creation of public access to the Metropolitan Open Land at the N13.SA3 Former East Ham Gas Works site allocation and the enhancement of the open space at N10.SA3 Newham Leisure Centre to create a new Local Park; and f. the re-provision of playing pitches at N13.SA3 Former East Ham Gas Works site allocation and the Lady Trowers Trust Playing Field, through bringing them back into public use; and g. new playspace or playable public realm on the majority of site allocations; and h. development that supports the vision of the Lee Valley Regional Park Authority's Development Framework (Area 1); and

		<p>i. a new leisure centre on N11.SA1 Beckton Town Centre or N17.SA1 Beckton Riverside, a new sports facility at N8.SA7 Rick Roberts Way, a new leisure centre in the N4 Canning Town neighbourhood and an upgraded and redeveloped Newham Leisure Centre (as part of site allocation N10.SA3), subject to a needs based assessment at the time of delivery.</p>
BFN2	Co-designed masterplanning	<p>1. Sites should be designed and developed comprehensively. Piecemeal delivery will be resisted, particularly where it would prejudice the realisation of the relevant neighbourhood vision, neighbourhood policy, site allocation development principles and/or site allocation design principles or where the timing of delivery would be unsupported by infrastructure.</p> <p>2. All major applications and applications on site allocations must undertake co-designed site masterplanning, demonstrate through engagement with different stakeholders that their. This masterplanning must has considered all of the following:</p> <ul style="list-style-type: none"> a. how the required land uses and infrastructure provision on the site will be delivered; b. relevant neighbourhood and/or site allocation design principles; c. integration of the scheme with its wider surroundings, including any effects on the historic environment; d. delivery of key walking and cycling connections within the site and to and from key local facilities; e. layout of the site to ensure neighbourliness; and f. how Biodiversity Net Gain will be delivered on site, natural features will be incorporated and appropriate mitigation for environmental harm made. <p>4. All phased sites, where parts of the site will remain vacant or underused for more than three years, must submit a Meanwhile Use Strategy which will outline how vacant and underused plots will be activated, where site specific circumstances allow.</p> <p>5. All developments on site allocations are expected to undertake post occupancy surveys and share the results with the Council.</p>
BFN4	Developer contributions and infrastructure delivery	<p>2. Where a site is not proposing to meet all policy requirements or related obligations the target level of affordable housing on viability grounds, applicants must:</p> <ul style="list-style-type: none"> a. explore all available options (including review mechanisms, flexible trigger points or phased payment of contributions) to reduce the viability gap and secure much needed contributions; and

		<p>b. submit a financial viability assessment. This assessment will be made public and subject to independent scrutiny at the applicant's cost.</p> <p>3. Where substantiated financial viability constraints remain, applicants should deliver the maximum viable level of obligations, and it is expected that the Plan's objectives will be prioritised as follows, unless specific site circumstances determine otherwise:</p> <ul style="list-style-type: none">a. affordable and family housingb. local access to employment and trainingc. delivery of required infrastructure. <p>4. Applications for developments at, or over, 250 units/hectare density or for major developments on site allocations will be required to demonstrate there is sufficient infrastructure to support the proposed scale of development, through the provision of an Infrastructure Sufficiency Statement.</p>										
Design												
D2	Public realm net gain	<p>2. All new-build developments and developments for a change of use that are either on sites with a streetfacing boundary of at least 25m, or that are major residential developments, should make positive qualitative contributions to the public realm through the following:</p> <p>d) in areas of deficiency of access to children's play space, major developments that generate an over-5s child yield at ten or above are strongly encouraged to deliver part of their formal playspace requirements within the public realm, and/or provide additional formal or informal playspace in the public realm. Developments are encouraged to deliver that is over and above the floorspace requirements set out in Local Plan Policy H11 and/or the site allocation, where site specific circumstances allow;</p> <p>3. All major developments referable to the Mayor of London are required to make a proportionate contribution towards public realm enhancement and maintenance beyond the site, as informed by an Active Travel Zone Assessment (TfL) and subject to the financial viability of the Site.</p>										
D4	Tall Buildings	<p>Table 1: Tall Building Zones</p> <table><tr><th>Tall building Zone</th><th>Neighbourhood</th><th>Site Allocations</th><th>Height Range Maximum</th><th>Further guidance</th></tr><tr><td></td><td></td><td></td><td></td><td></td></tr></table>	Tall building Zone	Neighbourhood	Site Allocations	Height Range Maximum	Further guidance					
Tall building Zone	Neighbourhood	Site Allocations	Height Range Maximum	Further guidance								

		TBZ3: East Ham	N13 East Ham	N/A N13.SA3 Former East Ham Gasworks	32m (ca. 10 storeys) with opportunity for one tall building element at 50m (ca. 16 storeys) in the defined area.	<ul style="list-style-type: none"> • Prevailing heights should be between 9m and 21m (ca. 3-7 storeys). • Opportunity to include tall building elements up to 32m (ca. 10 storeys). • Limited opportunity in the far north east corner to include a tall building element up to 50m (ca. 16 storeys) in the defined area. • Tall building elements should be limited in number and height, scale and massing should be assessed to avoid harm to the significance of relevant heritage assets. • Development should be mindful of height transitions when delivering higher densities.
		TBZ5: Gallions Reach	N17 Gallions Reach	N17.SA1 Beckton Riverside	32m (ca. 10 storeys); 40m (ca. 13 storeys); 50m-80m (ca. 16 - 27 storeys) in the defined areas.	<ul style="list-style-type: none"> • Prevailing heights should be between 21m and 32m (ca. 7-10 storeys), 30m and 50m (10-20 storeys) • Opportunity to include tall building elements up to 40m (ca. 13 storeys) in limited locations including but not limited proximity to Gallions Reach DLR station and the riverside to mark the neighbourhood parade, and 50m- 80m (ca. 16- 27 storeys) in limited locations not limited to 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.
		TBZ15: West Ham Station	N7 Three Mills	N7.SA2 Twelvetrees Park and Former	50m (ca. 16 storeys) and 30m- 60m	<ul style="list-style-type: none"> • Prevailing heights should be between 21m and 32m (ca. 7-10 storeys), 30m and 60m (ca. 10-20 storeys) except in the immediate context of the listed gasholders where prevailing

				Bromley By Bow Gasworks	(ca. 10- 20 storeys) and 100m (ca. 33 storeys) in the defined areas.	<p>heights should be between 9m and 21m (ca. 3-7 storeys).</p> <ul style="list-style-type: none"> • In the immediate context of the listed gasholders, opportunity to include limited tall building elements of up to 32m (ca. 10 storeys). • Along the railway line and Bow Creek (River Lea) and to mark West Ham station, There is opportunity to include limited tall building elements of up to 100m (ca.33 storeys), which are sufficiently spaced to allow for views and space around the listed gasholders. • In the rest of the Tall Building Zone, opportunity to include limited tall building elements of up to 50 m (ca. 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.
		TBZ18: Stratford High Street	N7: Three Mills and N8 Stratford and Maryland	N7.SA3 Sugar House Island	50m (ca. 16 storeys) and 100m (ca. 33 storeys), 60m (ca. 20	Prevailing heights should be between 21m and 32m (ca. 7-10 storeys) 30m and 60m (10-20 storeys) except at the sensitive edges of the tall building zone, where prevailing heights should be between 9m and 21m (ca. 3-7 storeys).

				<p>N8.SA3 Greater Carpenters District</p> <p>N8.SA4 Stratford High Street Bingo Hall</p> <p>N8.SA7 Rick Roberts Way</p> <p>N8. SA8 Bridgewater Road</p> <p>N8.SA9 Pudding Mill</p>	<p>storeys), 40m (ca. 13 storeys) and 32m (ca. 10 storeys) in the defined areas.</p>	<ul style="list-style-type: none"> • Opportunity to include limited tall building elements up to 50m (ca. 16 storeys) and 100m (ca. 33 storeys), 60m (ca. 20 storeys), 40m (ca. 13 storeys) and 32m (ca. 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 their scale, grain and significance as well as the wider streetscape and local character. • 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 Lane conservation area 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.
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High Streets			
HS1	Newham's Town Centres Network	3. Development within the areas identified to deliver new and extended local centres, within the boundaries mapped on the Policies Map, should contribute to the masterplanned delivery of the centres by applying all of the following principles: b. The overall scale of main town centre uses or social infrastructure uses of the local centre will be informed by floorspace need and commercial demand primarily result in at least 20 non-residential units. The majority of units will be between 80 sqm and 150 sqm GIA each. A small to medium sized food store may be appropriate to meet local need, subject to passing a retail Impact Assessment. 4. Development within neighbourhood parades or proposed new non-designated small scale shopfront unit groupings should ensure that: c. small food store of more than 300 sqm GIA may be appropriate, subject to passing a retail Impact Assessment, and the use is limited through condition. d. Any proposal resulting in 1000sqm GIA or more cumulative floorspace in main town centre uses, including creation of new neighbourhood parades, is supported by an Impact Assessment and a well-resourced Vacancy Prevention Strategy.	
Social Infrastructure			
SI2.2	New and re-provided community facilities and health facilities	Only if suitable sites in the town centre, local centre or edge of centre locations are not available (or are not expected to become available within a reasonable period) should out of centre sites be considered.	
SI4	Education and childcare facilities	3. The appropriately timed delivery of new educational facilities to meet changing pupil place needs will be secured through: b. securing the long-term option to deliver an education facility on specified site allocations supported by appropriate evidence and trigger points for release if not needed; and c. requiring a flexible design so the a facility can be phased, expanding to meet the needs of development over time up to an agreed maximum facility size at that site. can grow incrementally as pupil numbers increase over the time of the development.	
Inclusive economy			
J1 Table 6	Employment and growth	Table 6: Strategic Industrial Locations (SIL5)	
		Designation	Priority Uses
			Design and Delivery Principal

		<p>SIL 5: Beckton Riverside</p> <p>Large scale industrial with a focus on:</p> <ul style="list-style-type: none"> - Warehousing and logistics (third party logistics, last mile and quick commerce); and - Utilities infrastructure; and - Transport depot; and - Clean, green and low carbon industries. 	<p>i. No residential floorspace is permitted in these designations.</p> <p>ii. New office floorspace (E(g)(i)) will be supported only where it is ancillary to the function of the industrial floorspace and of an appropriate scale.</p>
Homes			
H3	Affordable housing	<p>1. Newham's policy priority is the provision of more social rent homes. Residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should provide:</p> <p>a. the percentage of affordable housing required through the threshold approach as set out within Policy H5 of the London Plan (2021). 50 per cent of the total residential units as social rent housing and 10 per cent of the total residential units as affordable home ownership housing.</p> <p>b. an affordable housing tenure mix of 70 per cent social rent housing and 30 per cent intermediate homes.</p> <p>Developments that do not meet these requirements and the delivery of the required level of family dwellinghouses (C3) under 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.</p> <p>2. New residential developments with the capacity to deliver ten dwellinghouses (C3) or more should provide affordable housing on site. Where the Council considers that on site provision is inappropriate or undeliverable due to site conditions or the scale of the site, the applicant should:</p> <ul style="list-style-type: none"> a. prioritise off site provision of affordable housing with the equivalent quantity, tenure and size mix required under part 1; or b. where off site provision of affordable housing is not deliverable, a payment in lieu of affordable housing may be accepted. The payment in lieu should result in the ability to secure a higher level of affordable housing provision than the 60 per cent strategic target sought by part 1 above; and c. where applicants are proposing to not meet the requirements of parts 2.a or 2.b, this will not be supported unless an application is accompanied by a detailed financial viability assessment, demonstrating that the maximum viable amount will be delivered. 	

H4	Housing mix	<p>2. New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver 40 per cent of the number of new residential units as family dwellinghouses (C3) with three or more bedrooms. Developments that do not meet these requirements on site and the delivery of the required level of affordable housing under Local Plan Policy H3.1 will not be supported unless accompanied by a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered.</p> <p>3. New residential developments on site allocations should seek to maximise the number of provide a minimum of five per cent of the proposed residential units as four or more bed affordable family dwellinghouses (C3)..</p> <p>4. New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 15 per cent of the number of new residential units as one bedroom, two person dwellinghouses (C3).</p> <p>5. New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 5 per cent of the number of new residential units as studio or one-bedroom, one person dwellinghouses (C3).</p>
H5	Build to Rent Housing	<p>1. To qualify as a Build to Rent development the following criteria should be met: c. the dwellinghouses (C3) should be held as Build to Rent under a covenant for at least 15 years; and</p> <p>3. Developments of Build to Rent housing as the sole residential tenure should provide affordable housing in line with the threshold approach as set out within Policy H5 of the London Plan (2021). at least 50 per cent of the total units as Affordable Rented Homes at equivalent rents to London Affordable Rent and 10 per cent of the total units being Affordable Rented Homes at equivalent rents to London Living Rent. These affordable homes will be secured as affordable housing in perpetuity irrespective of the covenant period secured through H5.1.c.</p> <p>4. Developments of Build to Rent housing that fail to deliver sufficient affordable housing in accordance with the requirements of parts 2 or 3 and the delivery of the required level of family dwellinghouses (C3) under 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. Developments of Build to Rent housing that are</p>

		required to submit a detailed financial viability assessment should submit dual viability assessments that incorporate viability testing that set out outcomes in relation to 'Build for Rent' and 'Build for Sale' approaches and the subsequent impact upon the delivery of affordable housing.
H8	Purpose-built student accommodation	<p>2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where:</p> <ul style="list-style-type: none"> a. it is located within or adjacent to an existing campus development in the borough; or b. it is in or close to a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and c. it will not create an over-saturation of purpose-built student accommodation; or d. it is solely providing a replacement facility with no net increase in bed spaces, or it is located within or adjacent to an existing campus development in the borough.
H11	Housing design quality	<p>2. All new general needs housing should be designed to:</p> <ul style="list-style-type: none"> d. avoid seek to reduce single-aspect dwellinghouses (C3) where feasible, particularly where these are north-facing; and e. locate any ground floor private amenity spaces away from street facing facades. <p>4. Development referable to the Mayor of London should design a proportion of social rent rooms in accordance with the recommendations of Newham's forthcoming 'Housing design needs study' guidance.</p> <p>5. Major residential developments should incorporate shared amenity spaces that foster social interaction and a sense of community. External communal amenity spaces should be designed to:</p> <ul style="list-style-type: none"> a. provide 50m2 for the first ten residential units or private rooms (if not self-contained) and 1m2 for each additional residential unit or private room (if not self-contained), where feasible;
Green and water spaces		
GWS1	Green spaces	<p>3. Developments on green space (excluding Metropolitan Open Land and Green Belt) will only be supported in exceptional circumstances.</p> <p>4. Where a development is providing publicly accessible green space, it should:</p> <ul style="list-style-type: none"> d) maximise biodiversity, delivering a minimum 10 percent Biodiversity Net Gain in a way that is particular to the local need and environmental character (see Local Plan Policy GSW3);

		<p>5. It is expected that new green space on site allocations or space which will function as a local park will either:</p> <p>a. Be transferred into the Council's ownership. A commuted sum, to cover the cost of maintenance over a period of 15 years, will be secured through a legal agreement.</p> <p>or</p> <p>b. Where it is agreed that the publicly accessible green space will not be adopted, a Management Plan should be provided which demonstrates how the requirements of the Public London Charter principles will be met and secured.</p>
GWS3	Biodiversity, urban greening, and access to nature	<p>1. Development should contribute to nature recovery in Newham by protecting and enhancing biodiversity (green and water). This will be achieved through:</p> <p>a. protecting existing habitats and features of biodiversity value. If this is not possible, replacing lost features within the development site, where feasible and delivering improved biodiversity value;</p> <p>3. Development in areas deficient in access to nature should deliver new or improved green or water spaces which have intrinsic nature conservation value that would qualify as a Borough Site of Importance for Nature Conservation.</p> <p>4. Development must deliver a Biodiversity Net Gain of at least 10 per cent. All opportunities should be explored to deliver Biodiversity Net Gain on-site Where it can be demonstrated that on-site net gain is not possible, applicants must seek to deliver their off-site Biodiversity Net Gain in Newham. Out of borough registered of site Biodiversity Net Gain will only be accepted where it can be demonstrated there are insufficient sites and credit schemes in Newham to deliver the required net gain.</p> <p>7. The Epping Forest Special Area of Conservation will be protected and enhanced by ensuring that development within 6.2km of the boundary of Epping Forest Special Area of Conservation demonstrates that, if necessary, measures are put in place to avoid or mitigate any potential adverse effects, through:</p> <p>a. developments of new net additional residential homes contributing towards the delivery of the agreed Strategic Access Management and Monitoring Strategy; and or</p> <p>b. developments of new net additional residential homes contributing to the provision of Suitable Alternative Natural Greenspace.</p>
Climate emergency		

CE2	Zero Carbon development	<p>1. New development should be designed and constructed to be Net Zero Carbon in operation, using as little energy as possible to heat a building over a year, and meeting the following standards:</p> <p>a. All new residential units should achieve a space heating demand of less than 20 kWh/m² GIA/yr.</p> <p>b. All new non-domestic buildings except industrial buildings should achieve a space heating demand of less than 20 kWh/m² GIA/yr.</p> <p>c. All new industrial buildings should achieve a space heating demand of less than 15 kWh/m² GIA/yr.</p> <p>d. All other development is encouraged to use as little energy as possible to heat the building.</p> <p>3. New development should be designed and constructed to be Net Zero Carbon in operation, using as little energy as possible over a year and should meet the following standards:</p> <p>a. All new residential units should achieve an Energy Use Intensity (EUI) of no more than 35 kWh/m² GIA/yr.</p> <p>b. New non-domestic buildings should achieve an Energy Use Intensity (EUI) of no more than the following by the following use:</p> <p>i. Student accommodation—35 kWh/m² GIA/yr.</p> <p>ii. Offices, Retail, Higher Education Teaching facilities, GP surgeries, Hotels—55 kWh/m² GIA/yr.</p> <p>iii. Schools—65 kWh/m² GIA/yr.</p> <p>iv. Leisure, warehouses, and light industrial units—100 kWh/m² GIA/yr. An additional 20 kWh/m² GIA/yr budget is available for warehouses/industrial units that operate for 24 hours a day.</p> <p>c. In all cases, a building should use as little as energy as possible.</p> <p>4. New development should generate renewable energy on site, to a level equivalent to, or in excess of, the predicted annual energy demand of the building, in accordance with the following requirements:</p> <p>a. As a minimum, the amount of energy generated in a year must be:</p> <p>i. at least 80 kWh/m² per building footprint per annum for all building types except industrial buildings; and</p> <p>ii. at least 120 kWh/m² per building footprint per annum for industrial buildings</p> <p>b. Where it can be sufficiently evidenced that it is not technically possible for the amount of energy generated in a year through onsite renewable energy production to match or exceed the predicted annual energy demand of the building, the applicant should fund renewable energy generation (equivalent to the shortfall) elsewhere in the borough through a cash-in-lieu contribution.</p>
CE3	Embodied Carbon	<p>5. Major developments are expected to meet embodied carbon limits of less than 500kg CO₂/m².</p>
CE4	Overheating	<p>2. Developments should mitigate overheating using 'passive design' principles as a priority, rather than using 'active cooling' such as air conditioning.</p>

		<p>-----Regulation 19 policy wording-----</p> <p>2. Developments should mitigate overheating by using 'passive design' principles, rather than relying on 'active cooling' such as air conditioning.</p>
CE7	Managing flood risk	<p>2. Developments within Flood Zones 2 (medium probability of flooding), or where detailed more up to date modelling shows it will be at increased risk of flooding due to the impacts of the climate emergency, should:</p> <p>d. ensure all basement locations provide internal access and egress via floors no less than 300 millimetres above the one per cent annual probability flood level and an allowance for the impact of the climate emergency, or above the 2100 tidal breach flood level where the site is within the Thames tidal breach flood extent; and</p> <p>e. ensure all 'more vulnerable', 'highly vulnerable' and 'essential infrastructure' uses have finished floor levels no less than 300 millimetres above the one per cent annual probability flood level and an allowance for the impact of the climate emergency; and</p> <p>f. provide safe access/egress, such that occupants can reach Flood Zone 1 via public rights of way or, if not possible, safe havens on higher floors.</p> <p>3. Developments (including redevelopment of existing buildings and sites) must be set back a minimum of 16 metres (where feasible) from the landward side of tidal flood defences and eight metres from the landward side of river defences to future proof against increased risks of fluvial flooding, taking into account the requirements set out in the Thames Estuary 2100 Plan. Where no formal defences are present, development must be set back eight metres from the top of the river bank.</p>
Transport		
T3	Transport behaviour change	<p>6. Electric Vehicle Charging Points will be supported where the following requirements must be met:</p> <p>c. Major developments with zero car parking on site must provide contributions towards Electric Vehicle Charging Points in other parts of the borough.</p>
Waste and utilities		
W3	Waste management in developments	<p>3. Major residential developments on site allocations should provide a well-managed reuse 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, where feasible.</p> <p>4. Developments should provide only one waste management solution or technology on-site.</p>

		8. Developments that propose alternative waste management technologies, including those site allocations that require the delivery of an automated vacuum waste collection system, should be discussed at an early stage of design with the waste and recycling team. Automated vacuum waste collection systems should be able to collect dry recyclables, organics and residual waste as separate streams.
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Appendix 13

N7 THREE MILLS – TRACK CHANGES

Appendix 13: N7 Three Mills Neighbourhood – Suggested amendments

N7 Three Mills	
Reference	The Berkeley Group proposed amendments to draft policy wording
Introductory text	The neighbourhood's riverside location will be enhanced, including improving views across the water, access to the water where possible or feasible , and the natural environment along the water. Walking and cycling routes, particularly the Greenway, the Lee Navigation towpath and the Leaway, will be improved. The severance of the neighbourhood's transport infrastructure will be reduced through new bridges where possible or feasible and improved wayfinding and easy to follow, safe, green and accessible walking and cycling connections to public transport and the neighbourhood's open spaces.
Vision Point 1	Supporting a moderate significant uplift in density in 'enhance' areas, where, through appropriate typologies to the site's context, development enhances the character of the neighbourhood and consolidates the urban form.
Vision Point 4	supporting the transformation of N7.SA1 Abbey Mills, N7.SA2 Twelvvetrees Park, Former Bromley By Bow Gasworks and N7.SA3 Sugar House Island, in accordance with the Abbey Mills, West Ham Station and Stratford High Street Tall Building Zones and Local Plan Policy D4 and having significant regard to their riverside context, and the neighbourhood's heritage assets; and the Site's location within a Tall Building Zone and Poplar Riverside Opportunity Area;
Vision Point 8	supporting the delivery of new residential moorings where feasible in suitable locations with appropriate ancillary facilities
Vision Point 10	improving conditions for walking, cycling and public transport by: c. requiring and supporting new crossings and station access where feasible at Twelvvetrees Crescent and Manor Road to reduce severance and to improve connectivity to the wider network of neighbourhoods;
Vision 11 Point	retaining existing mature trees except in exceptional circumstances and maximising the provision of new open space, green infrastructure and green links and the opportunities to increase biodiversity and enhance existing Sites of Importance for Nature Conservation, including through enhancements to the Greenway and the provision of new parks at N7.SA1 Abbey Mills and N7.SA2 Twelvvetrees Park and Former Bromley By Bow Gasworks;

N7.SA2 Twelvetrees Park and Former Bromley by Bow Gasworks – Suggested amendments

Site address	Land at Stephenson Street and Bromley by Bow Gasholders
Neighbourhood	Three Mills
Site area	19.97
Public Transport Accessibility Level	0-6
Flood Zone	Partial Flood Zone 2 and 3 Adjacent to Critical Drainage Area Flood Defence Safeguarding
Heritage Designations	<p>Within the Site:</p> <p>Bromley by Bow Gasholders (Grade II)</p> <p>Within the vicinity of the Site Adjacent to:</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) 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) Ancillary Pump</p>

	House To South East of Pumping Station (Grade II)
	Nos 116 to 130 (even) Abbey Lane (Grade II) C Station, with associated Valve House, Abbey Mills Pumping Station (Grade II)
	The Ironmongers Stone in Leather Gardens to the East of Abbey Road (Grade II)
	Tide Mill (known as the House Mill) (Grade I)
	Offices opposite Clock Mill (Custom House) (Grade II) Clock Mill and 3 drying kilns (Grade I)
	Paved Roadway extending from west side of House Mill to wall and gate on east side of clock mill (Grade II)
	The Still, 3 Mills Distillery (Locally Listed)
	Twelvetreets Crescent Bridge (Grade II)
	War Memorial (Grade II)
	The Old London Gas Museum (Locally Listed).
	Canning Town / Newham Way Archaeological Priority Area (Tier 3)
	Statue of Corbett Woodhall (Grade II)
	Dowgate Wharf P B Burgoyne and Company Limited Warehouse (Grade II)
Natural environment Designations	Partial open space and Site of Importance for Nature Conservation
	Open Space Deficiency
	Tree Protection Orders
	Air Quality Management Area
Ownership	Private

Existing uses	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 Twelvetreets Park (former Parcelforce Depot).
Map	See Figure Below
Development principles	<p>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.</p> <p>Development should address the need for community facilities in the area by delivering new community facilities in Twelvetreets 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.</p> <p>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.</p> <p>Development on the remainder of the site should deliver the same quantity of employment floorspace as the permitted scheme.</p> <p>Proposals will require an assessment of, and an appropriate viable strategy for, the Grade II listed gasholders</p>

	<p>Development proposals should ensure that flood risk is minimised, mitigated and informed by a site specific Flood Risk Assessment, as per Local Plan Policy CE7 and informed by the Strategic Flood Risk Assessment Level 2 Site Assessment (2023).</p>
Design principles	<p>The site should be subject to a Design Code that seeks to ensure adjoining developments are considered designed and developed comprehensively in accordance with Local Plan Policy BFN2.</p> <p>Building heights should reflect the Site's location within a Tall Building Zone and should be subject to a design led approach that could range from 3 to 35 storey, following a design led approach 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.</p> <p>The Twelvetimes Local Centre should be located in the Twelvetimes area of the site, in proximity to West Ham Station. and provide Ground floor active frontages should be provided throughout the Site. The health centre should be located in proximity to the Twelvetimes Local Centre and in an accessible and prominent part of the site.</p> <p>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.</p> <p>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 whilst finding a viable strategy for their reuse. Height, scale and massing should conserve and enhance the character of heritage assets without</p>

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, *where feasible*.

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, *where technically feasible*.

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 Twelvetees Local Centre and the Manor Road neighbourhood *where feasible*. 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	<p>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.</p> <p>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 and delivered within the local centre close to West Ham station.</p> <p>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</p>
Phasing and implementation	Short to long term.



Appendix 14

N8 STRATFORD AND MARYLAND – TRACK CHANGES

Appendix 14: N8 Stratford and Maryland Neighbourhood – Suggested amendments

N8 Stratford and Maryland Neighbourhood	
Reference	The Berkeley Group proposed amendments to draft policy wording
Vision Point 1	supporting a significant moderate uplift in density in ‘enhance’ areas where development enhances the character of the neighbourhood and consolidates the urban form;

N8.SA7 Rick Roberts Way site allocation – Suggested amendments

Site address	Land between Rick Roberts Way to the north and Greenway to the south
Neighbourhood	Stratford and Maryland
Site area	4.3 hectares
Existing Public Transport Accessibility	Level 2-5
Flood Zone	Partial Flood zones 2 and 3
Heritage Designations	<p>Within site allocation:</p> <p>River Lea Archaeological Priority Area (Tier 3)</p> <p>In proximity of:</p> <p>Three Mills Conservation Area</p> <p>116 – 130 Abbey Lane (Grade II)</p> <p>Gate Lodge at Abbey Mills (Grade II)</p> <p>Former Superintendent House at Abbey Mills (Grade II)</p> <p>Chimney Stacks at Abbey Mills (Grade II)</p> <p>Abbey Mills Pumping Station (II*)</p>
	<p>Within site allocation:</p> <p>Air Quality Management Area</p> <p>Open Space Deficiency</p> <p>Adjacent to:</p> <p>Greenway Site of Importance for Nature Conservation,</p>
Natural environment Designations	

	Metropolitan Open Land and Open Space
Ownership	Public and private
Existing uses	Temporary community facility, vacant land, storage use and gasholder infrastructure.
Map	Edits requested as per previous comments
Development principles	<p>Residential, employment uses, sports and recreation uses, education and open space.</p> <p>The site is a surplus former gas site with no provision of industrial or employment floorspace.</p> <p>The employment use should be consistent with Local Plan Policy J1 and should prioritise light industrial floorspace.</p> <p>Development should protect and enhance existing sports and recreation uses in accordance with Local Plan Policies SI1 and SI3.</p> <p>The 1.2 hectares of open space should be provided on the publicly owned land.</p> <p>Development proposals should ensure that flood risk is minimised, mitigated and informed by a site specific Flood Risk Assessment as per Local Plan policy CE7 and informed by the Strategic Flood Risk Assessment Level 2 Site Assessment (2023).</p>
Design principles	<p>The site should be designed and developed comprehensively in accordance with Local Plan Policy BFN2.</p> <p>Building heights should range between 21 – 32m (ca. 7-10 storeys) with taller buildings up to 50 56m (ca. 16 17 storeys) towards the high street. Massing should step down towards the east to sensitively integrate with the low rise context of the listed cottages on Abbey Lane.</p> <p>The design and layout of the site should establish a connected network of streets and spaces that connects to the existing street network and should create a street hierarchy.</p> <p>Development in the south of the allocation is intended for residential only.</p>

The design and layout of the site should provide new and improved routes for walking and cycling, including where possible, facilitating two routes either side of the school site within the LBN and LLDC land holdings to connect the Greenway and Rick Roberts Way. Improvements should also be made to ~~provide a fully accessible connection between Abbey Lane and the Greenway and~~ the existing Greenway stairs connecting to Abbey Lane ~~in the south-eastern corner of the site~~ where possible. Any connections or access improvements to the Greenway would be subject to Thames Water landowner consent.

Development should provide a consistent frontage onto the Stratford High Street and the junction should be safe and welcoming. Development should improve walking and cycling conditions and the public realm on Rick Roberts Way, the Stratford High Street and Abbey Lane. Development should reinforce the legibility of the existing street hierarchy through appropriate scale and massing on primary and secondary streets, creating frontages to frame Rick Roberts Way and the Stratford High Street.

Development should conserve and enhance the significance of the listed cottages to the south east of the site and the character of the Three Mills conservation area. Height, scale and massing should avoid impact on important landmarks and key views set out in the Three Mills Conservation Area Appraisal and Management Plan and the Sugar House Lane Conservation Area Appraisal and Management Plan.

Design measures should ensure an air quality neutral approach and minimise exposure to poor air quality, particularly on Rick Roberts Way and the Stratford High Street.

The design and layout of the site should minimise the impact of noise from the Pressure Reduction System on residential amenity and take into account the underground cable route. Sustainable drainage should be considered from the outset and meet the requirements of Local Plan Policy CE8. The design and layout of the site should take account of risk of flooding

	<p>from all sources and meet the requirements of Local Plan Policy CE7.</p>
<p>Infrastructure requirements</p>	<p>Development should address existing open space deficiencies by providing a small open space with a minimum of 1.2 hectares. In addition to the open space, development should provide publicly accessible play space in the form of a Locally Equipped Area for Play and a Local Area for Play, which should be playable public realm.</p> <p>Development should provide a sports-lit Multi-Use Games Area unless delivered at N8.SA5 Stratford Town Centre West. Play space should meet the requirements of Local Plan Policy GWS5.</p> <p>Development should meet the need for school places by providing a Special Educational Needs and Disability school on the publicly owned land in accordance with Local Plan Policy SI4, which is within land that is under LLDC and LBN ownership.</p> <p>Development should deliver sports hall provision. Provision should meet the needs identified in the Built Leisure Needs Assessment (2024) and be delivered in accordance with the requirements of Local Plan Policies SI2 and SI3.</p> <p>The Pressure Reduction Station, electricity mast and sub-station should be retained or re-provided on the site. The district heating network connection to the north west of the site should be retained.</p>
<p>Phasing and implementation</p>	<p>Short/ Medium Term</p> <p>The potential impact of the underground cable route on design and layout should be taken into account at the pre-application stage through early engagement with National Grid UKPN.</p> <p>The potential impact of the gas pipes located underneath the Site should also be taken into account at the pre-applications stage.</p>



Appendix 15

N13 EAST HAM – TRACK CHANGES

Appendix 15: N13 East Ham Neighbourhood – Suggested amendments

N13 East Ham	
Reference	The Berkeley Group proposed amendments to draft policy wording
Vision Point 1	supporting development that enhances the neighbourhood's character and is sympathetic to and respects the character of its historic terraced streets through form, detailing and materials. Moderate uplift in density, <i>when informed by a design led approach</i> , will be supported where it enhances the character of the area, particularly in areas of mixed urban form;

N13.SA3 Former East Ham Sports Ground Leigh Road East Ham – Suggested amendments

Site address	Former East Ham Sports Ground Leigh Road
Neighbourhood	East Ham
Site area	10.3 hectares
Public Transport Accessibility	0-3
Flood Zone	The site is shown to be at significant risk of flooding in Flood Zone 3 and Flood Zone 2, as well as being at pluvial flood risk in the 1% and 0.1% AEP events and also being at risk if the Thames were to breach its bank and defences were to fail.
Heritage Designations	River Roding Archaeological Priority Area (Tier 3)
Natural environment Designations	<p>In an area of deficiency of access to all types of Parks, except the southern half of the site which is within the catchment for Barking Road Recreation Ground Local Park and of under provision to publicly accessible open space by head of population in 2038.</p> <p>Metropolitan Open Land and Former Leigh Road Sports Ground Sites of Importance for Nature Conservation</p> <p>Air Quality Management Area</p> <p>Source Protection Zone 2</p>
Existing uses	Former gasholders and associated infrastructure and open space currently

	<p>inaccessible to the public, which includes disused playing pitch.</p>
Map	<p>The map does not identify the previously developed land, and incorrectly applies a green wash across the whole site.</p>
Development principles	<p>Residential, open space and community facility, subject to a needs based assessment.</p> <p>Development should take place on the part of the site outside the Metropolitan Open Land. Development should protect the openness of the adjacent Metropolitan Open Land and maintain the site's role in providing a continuous chain of open space along Newham's eastern boundary.</p> <p>Development should explore the restoration of the Back River. Development should protect, enhance and bring back into public use the disused sports pitches in the Metropolitan Open Land in accordance with Local Plan Policy GWS1.</p> <p>Development should address the need for community facilities by delivering a new community facility with a local neighbourhood appeal (smaller than 1,000 sqm Gross Internal Area), unless it can be demonstrated that the needs of the community have already been met. Development should consider of all types of community facility, as set out in the Community Facilities Needs Assessment (2022) evidence base. Any provision of community facilities should meet the requirements of Local Plan Policies SI2 and SI3.</p> <p>Development proposals should ensure that flood risk is minimised, mitigated and informed by a site specific. Flood Risk Assessment, as per Local Plan policy CE7 and informed by the Strategic Flood Risk Assessment Level 2 Site Assessment (2023).</p>
Design principles	<p>The site should be designed and developed comprehensively in accordance with Local Plan Policy BFN2.</p>

	<p>Building heights should follow a design led approach and be in line with Policy D4 and the East Ham Tall Building Zone. Mid-rise residential buildings below 21m (ca. 7 storeys) are the most appropriate form of development which sensitively integrate with the scale and massing of the existing urban fabric. Massing should step down towards the east of the site to sensitively integrate with the existing two storey terraces on Leigh Road.</p> <p>The design and layout of the site should establish a connected network of streets and spaces and that connects into the existing street network and should create a street hierarchy. Routes to, from and through the site should improve access and connectivity to and along the River Roding and through the site from Southend Road through to Watson Avenue. The Any community facility provided should be located where there are good connections to the existing street network and in proximity to the open space.</p> <p>The layout of the site should protect the Site of Importance for Nature Conservation. Design measures should minimise exposure to poor air quality in accordance with Local Plan Policy CE6.</p> <p>The design and layout of the site should take into consideration the electricity pylons on the eastern boundary of the site and minimise the impact of noise from any required Pressure Reduction System on residential amenity.</p> <p>The design and layout of the site should take account of risk of flooding from all sources and meet the requirements of Local Plan Policy CE7. Sustainable drainage should be considered from the outset and meet the requirements of Local Plan Policy CE8.</p>
Infrastructure requirements	<p>Development should address existing open space deficiency by retaining the Metropolitan Open Land and make it publicly accessible.</p> <p>The open space provision should prioritise community growing opportunities as well as</p>

publicly accessible play space in the form of a Locally Equipped Area for Play. Development should also provide play space in the form of a Local Area for Play which should be playable public realm. Play space should meet the requirements of Local Plan Policy GWS5.

Development should retain the gas governor on site.

Phasing and implementation

Medium ~~to long~~ term



Appendix 16

N17 GALLIONS REACH – TRACK CHANGES

Appendix 16: N17 Gallions Reach Neighbourhood – Suggested amendments

N1 Gallions Reach	
Reference	The Berkeley Group proposed amendments to draft policy wording
Introductory text	<p>Gallions Reach will be transformed into a new neighbourhood through phased delivery, supported by transformative transport measures and local infrastructure improvements which could include the proposed DLR line extension and new station. through the delivery of an extended DLR line and new DLR station at N1.SA1 Beckton Riverside.</p> <p>The new neighbourhood will include a large number of homes, new and intensified employment uses and the creation of a new town centre and a new neighbourhood parade. The neighbourhood's riverside location will be optimised, through improved access and landscaping along both the River Thames and the River Roding. The neighbourhood will benefit from new green spaces and improved access to existing green spaces and nature. New development will benefit from new and improved public transport connections and a network of safe, green and accessible walking and cycling routes leading to destinations across the neighbourhood and to the wider network of neighbourhoods.</p> <p>To align with the delivery of a new DLR station or a similarly transformative (as confirmed by Transport for London) public transport intervention, a new town centre will be created. This will consolidate and diversify the existing retail offer alongside the creation of a local scale evening and night time economy. The neighbourhood will be supported by new community facilities and schools. The sewage works will be retained and any environmental impacts will be mitigated through appropriate buffering and design responses. The remaining industrial land will be intensified and continue to attract industrial, utilities, storage and distribution uses utilising the good accessibility to the strategic road network as well as identifying where industrial intensification might be able to take place alongside mixed use development including residential.</p>
Core text	<p>The vision for Gallions Reach will be achieved through the extension of the DLR and the creation of a new DLR station to enable the phased delivery of a housing at a density which is capable of supporting the creation of a new neighbourhood uplift in housing density and the creation of a new Town Centre, supported by transformative transport measures and local infrastructure improvements which could include the DLR line extension and new station. The vision for Gallions Reach will be achieved by:</p>
Vision Point 2	<p>encouraging 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. Any works carried out on the Victorian river piers would be subject to a third party involvement.</p>
Vision Point 9	<p>supporting the future extension of the DLR depot, which is well considered in collaboration with other stakeholders at Beckton Riverside</p>
Vision Point 10	<p>---Regulation 19 policy wording---</p>

	supporting the removal of the Thames Gateway Bridge Safeguarding (by the Secretary of State, following recommendation by Transport for London and the Mayor of London.
Vision Point 11	<p>---Regulation 19 policy wording---</p> <p>improving conditions for walking, cycling and public transport by:</p> <ul style="list-style-type: none"> c. supporting the provision of a Thames Clipper Pier, <i>where feasible and viable</i>; e. providing 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, <i>where feasible and viable</i>;
Vision Point 12	securing public access to green and water spaces and nature that are currently inaccessible to the public, including opportunities for water-related and water-dependent activities, <i>subject to feasibility</i> ;
Vision Point 13	retaining existing mature trees and maximising the provision of new open space, green infrastructure and green links, including through new parks and an active, landscaped edge along the water at N17.SA1 Beckton Riverside <i>where feasible</i> , and the use of street trees on Alfred's Way and opportunities to increase biodiversity and improve existing Sites of Importance for Nature Conservation, particularly along Royal Docks Road and the River Roding in partnership with London Boroughs of Redbridge and Barking and Dagenham;
Vision Point 15	providing 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, <i>where feasible and viable</i> ;
Vision Point 17	providing a new electricity substation, <i>that can be delivered in/close to the new neighbourhood</i> .
Vision Point 18	supporting new community facilities when in conformity with Local Plan Policy SI2, including a leisure centre and faith facilities, <i>subject to a needs based assessment at the time of delivery</i> ;
Vision Point 20	providing education provision in the form of a secondary school and primary school in close proximity to Atlantis Avenue and Armada Way, <i>subject to a needs based assessment at the time of delivery and feasibility</i> ;
Vision Point 21	requiring a new health centre to provide a wide range of health services, <i>subject to a needs based assessment at the time of delivery</i> ;

N1.SA1 Beckton Riverside site allocation – Suggested amendments

Site address	Gallions Reach Retail Park and Beckton Gas Works, Beckton, E6
Neighbourhood	Gallions Reach
Site area	84.66 hectares
Existing Public Transport Accessibility	Level 0-3
Flood Zone	Flood zones 2 and 3 Flood defence safeguarding
Heritage Designations	<p>Within site allocation:</p> <p>Beckton Archaeological Priority Area (Tier 3)</p> <p>Royal Docks Archaeological Priority Area (Tier3)</p> <p>In proximity of:</p> <p>Gallions Hotel (Grade II* listed)</p> <p>The Royal Standard (Locally listed)</p> <p>Pumping Station Gallions Roundabout, Royal Albert Way, Beckton, London, Newham, E6 6FZ (Locally listed)</p> <p>The Ferndale Public House (Locally listed) 2-100 Winsor Terrace, Beckton, London (Locally listed)</p>
Natural environment Designations	<p>In an area of deficiency of access to all parks.</p> <p>Site contains two Sites of Importance for Nature Conservation (SINCs)</p> <p>Air Quality Management Area</p>

Existing uses

The site contains remnants of the former Beckton gas works, the Gallions Reach shopping park and associated car parking and the Beckton DLR depot, which sits to the south of the former Beckon Gas works site, within retained Strategic Industrial Land.

The site contains a range of industrial uses in the south west corner of the site also designated as a Strategic Industrial Location. The site also contains larger areas of open space adjacent to the River Thames and the A1020, ~~including an area designated as SINC, which includes an attenuation pond serving Gallions Reach.~~

Map

Please see figure below

Development principles

---Regulation 19 policy wording---

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

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
- release of the land safeguarded for a river crossing ~~crossing~~ (by the Secretary of State, following recommendation by Transport for London and the Mayor of London).

Applications for the development of this site, and their phasing, should consider and relate to the range of potential transport infrastructure changes on this site, in line with the principles outlined below.

Until the DLR construction contract is let or a similarly transformative (as confirmed by Transport for London) public transport intervention has confirmed funding:

- Transformative development activity should only occur in the southern section of the site within easy walking distance of Gallions

Reach DLR station, which can be reached via a pleasant and safe route.

- Significant development and redesign of Gallions Reach Retail Park should not occur and applications on that part of the site will be assessed in accordance with Local Plan Policy HS1.

- The employment uses should be consistent with Local Plan Policy J1 and prioritise industrial floorspace, in particular transport and utilities infrastructure and large scale industrial uses with a focus on logistics and warehousing and clean, green and low carbon industries. Employment uses outside of the Strategic Industrial Locations should **not be limited to** ~~for~~ light industrial uses but **can also support spaces such as makers space and/or other employment generating uses.**

- A neighbourhood parade should be provided at a point between the location of the proposed new district centre and Albert Basin Local Centre, in line with the requirements in Local Plan Policy HS1.1.

- Development should address the need for community facilities in the area by delivering community facilities in the new neighbourhood parade, unless it can be demonstrated that the needs of the community have already been met. Development should consider 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 health centre should be located in the neighbourhood parade and the primary school and associated early years' provision should be located in the southern part of the site, in close proximity to the new developments to the south of site, **subject to an up to date needs assessment at the time of delivery as well as being subject to NHS requirements.**

- Development should deliver the Local Park, the continuation of the Thames Path through the site, an enhanced route to Gallions Reach DLR station and the extension of the Greenway into the site at the earliest opportunity, **where deliverable.**

Once the DLR construction contract is let or a similarly transformative (as confirmed by Transport for London) public transport intervention has confirmed funding:

- Transformative development activity on the remainder of the site can commence, of a scale which reflects the improved transport access.
- A new town centre should be delivered, consistent with a district centre designation.

There is an opportunity to provide the quantity and scale of uses consistent with a major centre, if supported by the findings of an up-to-date and robust Marketing Strategy, in line with the requirements in Local Plan Policy HS2.

The new town centre must be located in close proximity to the DLR station and be delivered in line with the requirements in HS1.2.

- The employment uses should be consistent with Local Plan Policy J1 and prioritise industrial floorspace in the Strategic Industrial Locations, in particular transport and utilities infrastructure and large scale industrial uses with a focus on logistics and warehousing and clean, green and low carbon industries. Smaller-scale office uses should be prioritised in the new district centre.

- Development should address the need for community facilities in the area by delivering new community uses in the new town centre, unless it can be demonstrated that the needs of the community have already been met. Development should consider 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.

- Any expanded health hub or sports and recreation use should be located in the most accessible part of the site, within the town centre. The secondary school should be located in close proximity to the new town centre and public transport.

All 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

	<p>Strategic Flood Risk Assessment Level 2 Site Assessment (2023).</p> <p>Development should acknowledge the associated costs of decommissioning and redeveloping a former gasworks site and the relocation of any significant equipment, including the need to address any environmental pollution and on-site decontamination requirements caused by the gas works.</p>
<p>Design principles</p>	<p>The site should be designed and developed comprehensively in accordance with Local Plan Policy BFN2. The masterplan must demonstrate that the proposed development is designed with suitable flexibility to accommodate the full range of transport options under consideration by Transport for London at the time of application and is phased to ensure sufficient transport infrastructure will be in place to support the development as it is occupied.</p> <p>Tall buildings should be delivered in line with the building heights outlined within Policy D4 and the guidance for Tall Building Zone 5: Gallions Reach, with building heights ranging between 17 and 27 storeys with building heights stepping down in areas controlled by CAA height restrictions. In the southern part of the site, building heights should range between 21-32m (ca. 7-10 storeys) with taller elements up to 40m (ca. 13 storeys) in limited locations To be located within the areas closest to Gallions Reach DLR station and alongside the riverside, with consideration given to marking the neighbourhood parade, and should follow a design led approach. With Buildings being should set back from the watercourse to avoid overshadowing impact</p> <p>In the northern part of the site, and once the DLR construction contract is let or a similarly transformative (as confirmed by Transport for London) public transport intervention has confirmed funding, building heights should range between 21-32m (ca. 7-10 storeys) with</p>

~~taller elements up to 50m (ca. 16 storeys) in limited locations at the new town centre and DLR station.~~

A buffer of employment uses should be provided between residential uses and the Strategic Industrial Location both within and adjacent to the site allocation. Non-residential stacked industrial buildings are considered to be the most appropriate typology to provide a buffer. The design and layout of the site should consider public realm enhancements and avoid habitable rooms and amenity spaces facing industrial uses. Separate HGV and pedestrian access should be designed to avoid conflicts between different uses, particularly where servicing the buffer building.

The new town centre should be designed to significantly increase accessibility by public transport and walking and cycle routes in order to reduce car dependency and parking. The new town centre should provide active frontages and quality public realm, including a new public square.

Proposals should preserve the green link between the river and green infrastructure along Royal Docks Road. Links from the site to the Sites of Importance for Nature Conservation to the north of Atlantis Avenue and to the north of Armada Way should be developed.

Design and layout of the site should establish a connected network of streets and spaces that connects to the existing street network and should create a street hierarchy. Routes through, and to and from, the site should improve access and connectivity to the existing residential neighbourhoods within Beckton, the new residential neighbourhood at Gallions Reach, Gallions Reach DLR Station and the banks of the River Thames.

Development should enable the continuation of the Thames Path through the site, the extension of the Greenway into the site and

	<p>should aid connectivity between the Greenway and the River Thames.</p> <p>Development should ensure legibility and connectivity across the new rail line.</p> <p>Design measures should minimise exposure to odour from Beckton Sewage Treatment Works and poor air quality on Royal Docks Road.</p> <p>The layout of the site should take account of the noise contours across the site from London City Airport and design measures should minimise exposure from the airport.</p> <p>The design and layout of the site should take account of risk of flooding from all sources and meet the requirements of Local Plan Policy CE7. Sustainable drainage should be considered from the outset and meet the requirements of Local Plan Policy CE8.</p> <p>Development should deliver the relevant site-specific integrated water management interventions outlined in section 1.3 of the Royal Docks and Beckton Integrated Water Management Strategy.</p> <p>The design and layout of the site should take account of the existing on-site sewer and overhead transmission line route</p>
Infrastructure requirements	<p>Development should support and enable the delivery of a new DLR route and station, through participating in a joint stakeholder approach with landowners, infrastructure providers and authorities, and improved capacity at Gallions Reach DLR.</p> <p>Development proposals within the part of the site safeguarded for the Thames Gateway Bridge must be referred to Transport for London and the Mayor of London for confirmation it will not preclude the delivery of a road crossing, until the safeguarding is removed as directed by the Secretary of State, following recommendation by Transport for London and the Mayor of London.</p> <p>Development should deliver an automated vacuum waste collection system to service all Local Authority Collected Waste generated by the development, in accordance with the</p>

~~requirements of Local Plan Policy W3.8, and subject to feasibility and viability studies.~~

Until the DLR construction contract is let or a similarly transformative (as confirmed by Transport for London) public transport intervention has confirmed funding:

- Development should provide a new primary school, with early year's childcare provision of the scale required to meet projected need for school places in accordance with Local Plan Policy SI4 and a health centre 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 address existing open space deficiency by providing a consolidated Local Park of a minimum of 2 hectares and Pocket Parks to service nearby residential neighbourhoods. The open space provision should prioritise the provision of community growing opportunities. In addition to the open space provision, development should provide publicly accessible play space in the form of a Local Area for Play a Locally Equipped Area for Play and a Neighbourhood Equipped Area of Play.
- Development should provide a sports-lit MUGA, meeting the requirements of Local Plan Policy GWS5.

Once the DLR construction contract is let, or a similarly transformative (as confirmed by Transport

for London) public transport intervention has confirmed funding, development should deliver:

- A new leisure centre in the district centre. Provision should meet the needs identified in the Built Leisure Needs Assessment (2024) and be delivered in accordance with the requirements of Local Plan Policies SI2 and SI3. A new leisure centre at this site is not required if the built leisure provision for the area has already been delivered at N11.SA1; and
- A secondary school of the scale required to meet projected need for school places. Open space for the secondary school can be split

	<p>between the core school site requirements and hard outdoor PE provision, which should be provided on the school site, and soft outdoor PE provision which can be met in another part of the allocation but within a 10 minute walk of the school. Both the hard and soft outdoor PE provision should be accessible to the wider community; and</p> <ul style="list-style-type: none"> • An expanded health hub (designed to meet NHS needs and standards for the projected population on the basis 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 due to its scale; and • safeguarded space for River Pier Landing Facilities and a River Pier
Phasing and implementation	Short to Medium to long term