

EXAMINATION OF LBTH LOCAL PLAN
HEARING STATEMENT TOM RIDGE (EEWG)
MATTER 10: SITE ALLOCATIONS
ISSUE 10: QUESTION 10.3

Site allocation 1.3 (Marian Place Gas Works and The Oval) does not “*recognise adequately*” the No. 2 and No. 5 gasholders as heritage assets.

- 1 Minor modifications under Design Principles include a positive response to the “*special character of the Regents Canal conservation area and its setting*” and a specific reference to “*gasholders no.2 and no. 5*” but it is not explained that the two gasholders are in the Regent’s Canal Conservation Area; nor is it explained that it is only the guide frames on their in-ground tanks that are proposed for *in situ* retention, conservation and reuse.
- 2 The guide frames on their in-ground tanks are still to be shown on Figure 25, which has a proposed open space (crossed by strategic, local and green grid routes) on the site of the No.2 and No. 5 gasholders.
- 3 A minor modification under Delivery Considerations states that development should “*acknowledge the associated costs of decommissioning the gasworks and the temporary relocation of any significant equipment and address (any environmental pollution) and on site decontamination requirements (... caused by the gasworks)*”.

The Marian Place Gasworks is, in fact, the Bethnal Green Holder Station, opened in the 1850s as a detached holder station for the 1823 Shoreditch Gasworks. The holder station is not, therefore, a former gasworks and was only used for the storage of gas. As it was not used for the manufacture and purification of coal gas, its levels of potential contamination and, therefore, the costs of decontamination, are likely to be very low. Even so, they are costs which should be borne by the developer and should not be added to the cost of “*retaining the gasholders*”.

The “*temporary relocation of any significant equipment*” is presumably the same as “*moving energy infrastructure*” (LP 194) to meet the “*ongoing requirements to provide gas infrastructure on site*” (officer response to LP 198). All of which constitutes an oblique reference to the fact that National Grid has to keep a small part of the site to meet its ongoing responsibility to maintain gas supply in the area currently supplied by the Bethnal Green Holder Station. The cost of doing this is, therefore, a developer cost which, in this case, should be borne by National Grid and not added to the cost of “*retaining the gasholders*”. So, the Council should not be “*reviewing the cost of retaining the gasholders*” with respect to the “*ongoing requirements to provide gas infrastructure on site*” (officer response to LP 198).

- 4 The adequate recognition of the No. 2 and No.5 gasholders as heritage assets to be “*retained, reused and enhanced*” is seriously diminished by the officer statement that the Council is giving further consideration to the retention of the gasholders as the cost of incorporating them “*may well be prohibitively expensive*” (LP 194).

The cost would be prohibitive should the retention require the gasholders to be “*dismantled, transported significant distances for refurbishment, reinforced when returned to the site for reassembly*” (LP 198).

However, the EEWG proposal is for the *in-situ* retention, conservation and reuse of the historic guide frames on their in-ground tanks (following the removal of the telescopic lifts and the water from the in-ground tanks). It would, therefore, not be necessary for the guide frames to be dismantled and transported for ‘refurbishment’ – they would be inspected and conserved *in situ* (from scaffolding); and would not need reinforcement and new foundations because the structural integrity of each circular guide frame on its incredibly strong circular in-ground tank would have been maintained at no extra cost.

The empty in-ground tanks would be checked for possible contamination, inspected and conserved. The in-ground brick tank would be provided with suitable drainage and infilled for use as a ‘gasholder park’ with its *in-situ* columnar guide frame, rather than within a reassembled guide frame as at King’s Cross (Appendix A). And the base of the in-ground concrete tank would be prepared for pile driving to support a circular block of flats built inside its *in-situ* guide frame, like the inserted block at Dublin (Appendix B) rather than the three blocks at King’s Cross which were enclosed by the reassembled guide frames (Appendix A). Both retained structures would be maintained and insured by the residents of the block inside the lattice girder guide frame.

- 5 The adequate recognition of the No. 2 and No. 5 gasholders as heritage assets to be “*retained, reused and enhanced*” is also seriously diminished by:
- the officer response to LP 923 that “*the proposed wording relating to residential units being incorporated into the gasholders is not considered to be appropriate as it has not been determined whether the gasholders will incorporate flats*”;
 - the officer response to LP 146 that the “*finer details of how the gasholders will be used within the development will be agreed through the pre-application / planning application process*”, by which time the No. 2 and No. 5 gasholders would have been demolished, like the No. 1 gasholder at Poplar (Leven Road Gas Works);
 - the officer response to LP 923 that the “*exact location of the open space will be agreed through the pre-application / planning application process*”; by which time the No. 2 and No. 5 gasholders would have been demolished, like the No. 1 gasholder at Poplar (Leven Road Gas Works);
 - the officer response to LP 198 that the “*reference to ‘sport’ will not be removed*”; and the officer response to LP 923 that the “*consolidated open space ... is designated to be usable for sport and recreation*”; this, together with the reduction in open space from 1.2 ha to 1 ha, would rule out any possibility of the proposed ‘gasholder park’ being an open space for passive recreation;
 - the contradiction between the statement that “*the plans will be amended ... to show the pedestrian and cycle routes only going to the edge of the green space*” (officer response to LP 37) and the statement that “*the plans will be amended to show... the pedestrian and cycle routes only going to the edge of the gasworks*” (officer response to LP 923); and
 - the contradiction between the statement that “*recognition of heritage assets are covered by (local plan) policy S.DH3*” (response to LP 590) and the statement that “*the status of the gasholders falls outside the scope of the Local Plan*” (response to LP 818).

6 The No. 2 and No. 5 gasholders are not designated heritage assets but they are in the Regent's Canal Conservation Area, which is a designated heritage asset. Furthermore, in the character appraisal they are named among the "*elements which form part of the canals special character and interest*". Under Local Plan Policy S.DH3 para. 6, the No. 2 and No. 5 gasholders (fully described in *Historic Waterside Gasholders in LB Tower Hamlets* and illustrated in Appendix C) are, therefore, "*elements which contribute*" to the "*special character or appearance*" of the Regent's Canal Conservation Area, and "*unlisted buildings that make a positive contribution to the character and appearance of*" the Regent's Canal Conservation Area. As such, there is "*a presumption in favour*" of their retention.

Not included in the information about the No. 2 gasholder in *Historic Waterside Gasholder in LB Tower Hamlets* are the facts that the No. 2 gasholder at Bethnal Green (1866) is the world's second oldest surviving gasholder and is the earliest and most 'classical' surviving example of its type in the world. The oldest surviving gasholder in the world is the No. 2 gasholder at Fulham (1829-30), which is a different type of gasholder with 'tripod' guide standards and is on Historic England's at-risk register.

With respect to Local Plan Policy S.DH3 para. 6, the fact that the No. 2 and No. 5 gasholders at Bethnal Green were issued with a Certificate of Immunity from Listing in December 2015 is not a material consideration.

7 For all the reasons set out above, site allocation 1.3 is not **positively prepared** with respect to "*protecting and celebrating our history and heritage*" and Local Plan Policy S.DH3 para. 6; and is not **consistent with national policy** with respect to:

- NPPF tenth Core Planning Principle (para. 17);
- NPPF para. 58, fourth bullet point (and PPG 007);
- NPPF para. 126, first bullet point; and
- NPPF para. 138 (embodied in Local Plan Policy S.DH3 para. 6).

N.B. NPPF para. 157 seventh bullet point is not included in this Hearing Statement as the EEWG's proposals for reuse constitute 'development'.

Site allocation 1.3 can be made sound by adopting the changes set out in EEWG representation of 16.10.2017, with two minor amendments under DESIGN PRINCIPLES:

- i) delete "like that at King's Cross" and insert "like Gasholder Park at King's Cross except that its guide frame would still be on its original in-ground brick tank", and
- ii) delete "like those at King's Cross" and insert "like the three blocks at King's Cross except that its guide frame would still be on its original in-ground concrete tank".

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Encl. Appendix A
Appendix B
Appendix C