

# Site Allocations Methodology

## Leaside Area Action Plan Regulation 18 Consultation Draft

October 2020

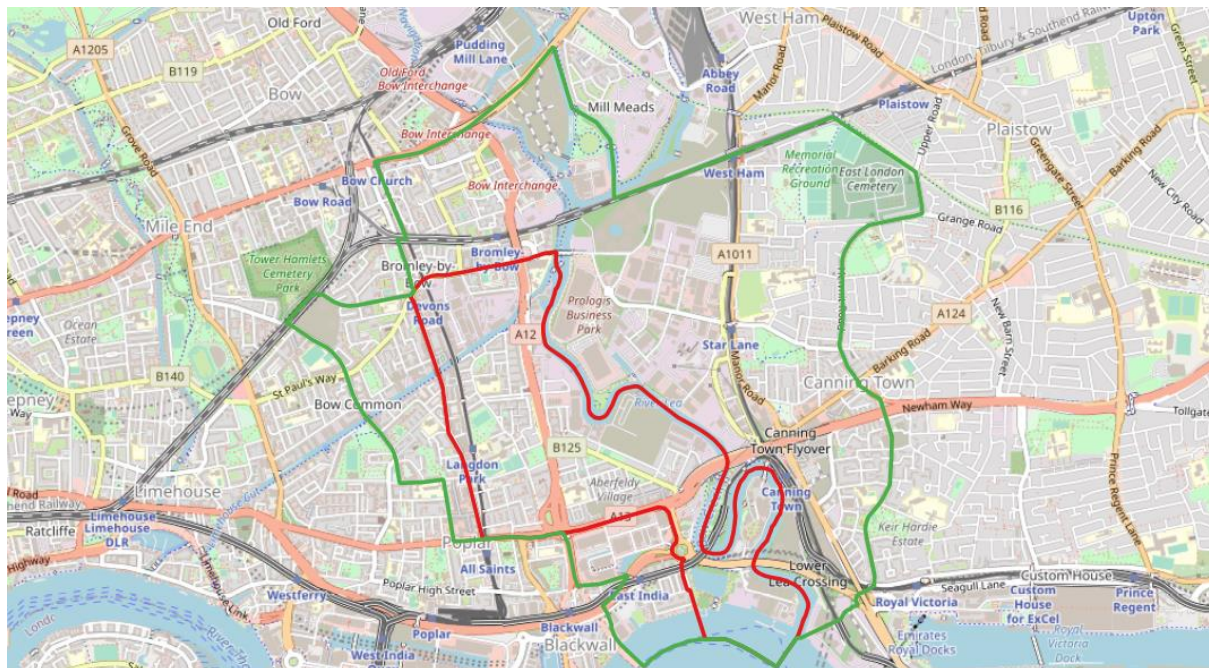


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# 1. Introduction

- 1.1. This paper presents the first stage in the process of identifying and allocating sites for the Tower Hamlets East of the Borough Area Action Plan (AAP).
- 1.2. The AAP will positively plan for future development in the Lower Lea Valley area of the borough, an area which is expected to see significant development in the coming years. Existing site allocations and other sites in this area have recently seen applications for greater numbers of residential units than were originally anticipated through the SHLAA process, and the council therefore considers it important to plan proactively for an area that may see a larger residential growth than originally planned for. By producing an AAP containing site allocations, the council can ensure that development is controlled and planned for, and brings suitable benefits for both existing and new residents of the area.
- 1.3. For the purposes of the initial development of the AAP, a 'core' and 'wider' area for the AAP were mapped out. The wider area is intended to be used for the purposes of evidence gathering, to ensure impacts on transport and other forms of infrastructure beyond the boundaries of the core area are understood (and, vice-versa, to ensure that the impacts of the population within the wider area on new infrastructure provided within the core area are taken into account). A map showing the core and wider areas is provided below.



- 1.4. During the Call for Sites exercise, respondents were invited to submit relevant sites within the wider area as well as the core area, with the assumption that the boundaries of the core area could be extended if there was a good reason to do so. This will be explored later in this paper.

1.5. The purpose of this paper is to identify potential sites for allocation in the AAP, and to provide an initial assessment of the suitability of those sites. This will inform the decision on which sites are taken forward to the next stage of the site allocation process.

1.6. The paper is structured as follows:

- Section 2 – policy and evidence background – an overview of the national and regional policies and evidence base documents informing the allocations process.
- Section 3 – site identification – an explanation of how sites were selected for inclusion in the assessment.
- Section 4 – site assessment – a detailed analysis of the suitability of the identified sites.
- Section 5 – conclusion – setting out which sites are considered suitable to be taken forward to the next stage of assessment, and whether the boundaries of the core area of the AAP should be extended.

1.7. The process of developing site allocations for the AAP is an iterative one, and intersects with a number of other evidence base documents that will be developed for the AAP examination. Broadly speaking, the approach is expected to be as follows:

- Stage 1 – Identification and initial assessment of sites – this is the stage presented in this paper.
- Stage 2 – Design-Led Capacity Assessment of selected sites to assess the potential capacity for housing and other uses of the selected sites, with input from additional evidence base documents such as the transport and movement assessments and the Infrastructure Delivery Plan, and discussions with landowners and developers to ensure allocations are realistic and deliverable.
- Stage 3 – Regulation 18 consultation on the draft AAP, including site allocations.
- Stage 4 – Refinement of site allocations, based on consultation responses and further discussions with landowners and developers; and viability assessment of proposed allocations.
- Stage 5 – Regulation 19 consultation and submission for examination.

1.8. The AAP will also be subject to a Sustainability Appraisal, which will include an appraisal of the selected site allocations and reasonable alternatives.

## 2. Policy and Evidence Background

### National Planning Policy Framework

- 2.1. The National Planning Policy Framework (NPPF) was most recently updated in February 2019.
- 2.2. Paragraph 16 of the Framework sets out that plans should:
  - “be prepared positively, in a way that is aspirational but deliverable” (clause b);
  - “be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees” (clause c); and
  - “serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area” (clause f).
- 2.3. Paragraph 20 sets out that strategic policies should make sufficient provision for:
  - “housing (including affordable housing), employment, retail, leisure and other commercial development;
  - Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
  - Community facilities (such as health, education and cultural infrastructure); and
  - Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation”.
- 2.4. Paragraph 23 sets out that “strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area”.
- 2.5. Paragraph 28 explains that non-strategic policies can also “include allocating sites, the provision of infrastructure and community facilities at a local level”.
- 2.6. Chapter 5 on ‘delivering a sufficient supply of homes’ sets out, in paragraph 67, that “planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of: a) specific, deliverable sites for years one to five of the plan period; and b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan”.

2.7. Paragraph 68 encourages the identification of small and medium sized sites, and expects local planning authorities to “identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved” (clause a), and to “work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes” (clause d).

2.8. Chapter 11 on ‘making effective use of land’ encourages the prioritisation of previously-developed land, but adds in paragraph 118 that planning policies should:

- “Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;
- Recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;
- 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;
- Promote and support 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 (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure); and
- Support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers”.

2.9. Paragraph 119 states that “local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them”.

2.10. Paragraph 122 explains that appropriate densities for development should take into account:

- “The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- Local market conditions and viability;

- The availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- The desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
- The importance of securing well-designed, attractive and healthy places”.

### Planning Practice Guidance

2.11. The Plan-Making guidance states “where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interested parties about the nature and scale of development” (paragraph 002). It also notes that “where relevant, strategic policy-making authorities will need to take into account the noise generated by existing businesses when allocating sites, in accordance with the ‘agent of change’ policy set out in the National Planning Policy Framework” (paragraph 043).

2.12. The Effective Use of Land guidance provides more detail on how appropriate densities can be determined, stating that decisions on this can be assisted by:

- “Accessibility measures such as distances and travel times to key facilities, including public transport stops or hubs (and taking into consideration service capacity and frequencies and destinations served)[...];
- Characterisation studies and design strategies, dealing with issues such as urban form, historic character, building typologies, prevailing sunlight and daylight levels, green infrastructure and amenity space;
- Environmental and infrastructure assessments, such as the capacity of services and presence of environmental risks (e.g. flood risks or overheating), and the opportunities to address these; and
- Assessments of market or site viability” (paragraph 004).

2.13. The Housing and Economic Land Availability Assessment guidance notes that the land availability assessment “does not in itself determine whether a site should be allocated for development. It is the role of the assessment to provide information on the range of sites which are available to meet the local authority’s [...] requirements, but it is for the development plan itself to determine which of those sites are the most suitable to meet those requirements” (paragraph 001). The same paragraph goes on to say that an assessment should identify sites and broad locations with potential for development, assess their development potential, then assess their suitability for development and the likelihood of development coming forward (i.e. their availability and achievability).

2.14. The guidance then provides some suggestion of what might be considered in the identification and assessment of sites. Planning authorities “need to be proactive in

identifying as wide a range of sites and broad locations for development as possible” and “it is important that plan-makers do not simply rely on sites that they have been informed about, but actively identify sites through the desktop review process” (paragraph 010). Assessment at this early stage should be proportionate, and may be able to identify sites that are clearly not suitable, and for which no further analysis is required (paragraph 014). Relevant information to assess at this stage might include site size, boundaries, and location; current land use and character; land uses and character of the surrounding area; physical constraints (access, contamination, steep slopes, flood risk, natural features of significance, location of infrastructure/utilities); potential environmental constraints; consistency with the development plan’s policies; proximity to services and other infrastructure, such as public transport; development progress; and an initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development (paragraph 015).

- 2.15. When considering the suitability of sites, plan-makers may also consider “national policy; appropriateness and likely market attractiveness for the type of development proposed; contribution to regeneration priority areas; and potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation” (paragraph 018).
- 2.16. In terms of availability, “a site can be considered available for development, when, on the best information available [...], there is confidence that there are no legal or ownership impediments to development” (paragraph 019).
- 2.17. In terms of achievability, “a site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period” (paragraph 020).

### London Plan

- 2.18. The new London Plan (Intend to Publish Version December 2019) sets out a design-led approach to assessing site allocation capacities in Policy D3. Clause A states “All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth, and existing and planned supporting infrastructure capacity [...], and that best delivers the requirements set out in Part B [relating to design]”. Clause C adds that “where development parameters for allocated sites have been set out in a Development Plan, development proposals that do not accord with the site capacity in a site allocation can be refused for this reason”. Under Policy D2, proposed densities should also “be linked to the provision of future planned levels of infrastructure rather than existing levels” and “be proportionate to the site’s



connectivity and accessibility by walking, cycling and public transport to jobs and services” (Clause A).

- 2.19. Policy D1 states in Clause B that, following that design-led approach, development plans should “establish optimised site capacities for site allocations. Boroughs are encouraged to set out acceptable building heights, scale, massing and indicative layouts for allocated sites, and where appropriate the amount of floorspace that should be provided for different land uses”.
- 2.20. Policy H2 on small sites states that boroughs should “identify and allocate appropriate small sites for residential development” (clause B), and the supporting text identifies small sites to be below 0.25 hectares. Table 4.2 provides a small sites housing target for Tower Hamlets of 5,280 across the ten years to 2029, which is part of the overall housing target for the borough.
- 2.21. The supporting text to Policy H10 on housing size mix says that “boroughs are encouraged to set out the preferred housing size mix (for all tenures) as part of a site allocation”.
- 2.22. The London Plan provides an overall housing target for Tower Hamlets of 34,730 in the ten years to 2029 (under Policy H1). This figure is inclusive of the small sites housing target referred to above.
- 2.23. The London Plan also designates the Poplar Riverside Opportunity Area (paragraphs 2.1.46-47), which stretches across both Tower Hamlets and Newham, and therefore is not completely contiguous with the AAP core area (the AAP core area also includes a small amount of the Isle of Dogs and South Poplar Opportunity Area, around City Island). The Poplar Riverside Opportunity Area is stated to have the potential for 9,000 new homes – mostly within the Tower Hamlets section, as the Newham part of this opportunity area is largely strategic industrial land.
- 2.24. At the time of preparing this paper, the new London Plan has not been adopted, and the Secretary of State has requested a number of changes be made to the Intend to Publish version – it is unclear what the final result of this will be. On the policy issues referenced above, the Secretary of State only makes relevant suggested changes to policy D3, where three additional clauses are requested.
- 2.25. New clause A states “The design of the development must optimise site capacity. Optimising site capacity means ensuring that development takes the most appropriate form for the site. Higher density developments should be promoted in areas that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling”. New clause B states “Where there are existing clusters of high density buildings, expansion of the clusters should be positively considered by Boroughs. This could also include expanding Opportunity Area boundaries where appropriate”. New clause D states “Gentle densification should be actively encouraged by boroughs in low- and mid-density

locations to achieve a change in densities in the most appropriate way. This should be interpreted in the context of policy H2”.

#### *Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits*

- 2.26. The Tower Hamlets Local Plan 2031 was adopted in January 2020. The new Local Plan sets a housing target of 5,748 new homes in the Lower Lea Valley sub-area between 2016 and 2031 (although this Local Plan sub-area is not quite contiguous with the AAP core area presented here).
- 2.27. The Housing Trajectory Statement prepared for the examination of the new Local Plan acknowledges that there is a shortfall in meeting the housing target in the years 2026-31 of 7,392 homes. This leads to an overall shortfall in meeting the housing target across the plan period of 5,232 homes. However, these figures were assessed against the adopted London Plan housing target for Tower Hamlets – this has been reduced in the new London Plan (see above). The reduction of the housing target for Tower Hamlets, if put in place, would mean that the current trajectory no longer has a shortfall in the later years of the plan period.
- 2.28. The trajectory assumes a windfall allowance of 3,010 homes across the plan period, or on average 201 per year – significantly less than the small sites target of 528 per year under the new London Plan (although other small sites may be covered under other elements of the trajectory).

#### *Discussion*

- 2.29. The Area Action Plan provides an opportunity to identify deliverable site allocations to make up some of the potential shortfall in the housing trajectory for years 11-15 of the Local Plan. This could include sites that were not available at the time the Local Plan site allocations were developed, or sites that are below the size thresholds set in the Local Plan site allocations methodology, which looked only for sites that could provide at least 500 homes and significant new infrastructure.
- 2.30. In developing site allocations, a design-led approach to site capacities should be followed, in line with the new London Plan. This will be the stage that follows on from this initial assessment of sites.
- 2.31. There is a new impetus in national and London policy to allocate small sites for development, and the new London Plan sets a small sites housing target for London boroughs, so this should be considered where possible. However, the Lower Lea Valley area may not be the right place to identify many small sites, as it contains a number of large estates and industrial sites that may be better redeveloped comprehensively rather than being artificially split into smaller site allocations.

- 2.32. The NPPF suggests that local authorities should be proactive in bringing forward public land for development where possible, and this may be able to play some role in the Lower Lea Valley area. A significant amount of land in this area is either publicly owned or owned by housing associations to which the land was transferred from public ownership.
- 2.33. The NPPF also encourages authorities to bring forward multiple benefits on previously developed land, and this may also be a key opportunity in the Lower Lea Valley, where a number of sites are currently used purely for industrial purposes – redevelopment presents the potential to maintain some of this industrial capacity while co-locating it with residential and commercial uses and alternative employment uses.

### 3. Identification of Sites

#### Sources for Sites

- 3.1. Potential sites were identified from a number of sources:
- 3.2. Sites identified in the SHLAA: a number of sites within the core and wider area were identified in the SHLAA as part of the Local Plan development process. Some of these sites are now under development, and some were allocated in the Local Plan. In some cases, smaller individual sites have been grouped together into larger potential sites for consideration, through officer knowledge of the area, land ownership considerations, and discussions with landowners and developers.
- 3.3. Sites considered through the Local Plan process: a Call for Sites was held during the Local Plan development process, but only sites that could provide more than 500 homes and strategic infrastructure were considered for allocation at that stage. The responses to that Call for Sites consultation were revisited to see if there were any proposed sites that are now more suitable for allocation in the AAP. Sites that have been allocated in the Local Plan have not been reconsidered, except where they were resubmitted to the AAP Call for Sites consultation.
- 3.4. Sites identified through the AAP Call for Sites: a Call for Sites for the Area Action Plan was held between 11 July and 23 August 2019, to ensure information about sites was up-to-date. Respondents were asked to submit sites within either the core or wider area, to indicate what the potential use of the site could be, and to provide as much information as possible on the site in terms of ownership and planning history, including a map of the site.
- 3.5. Officer knowledge: officers in the plan-making and regeneration teams at Tower Hamlets considered the proposed sites and whether there were any additional sites that had not been identified by the above methods. In some cases, sites that had been identified were grouped together for consideration as single large sites rather than multiple small sites. This has only been done where it made sense in terms of land ownership and development potential.

#### Identified Sites

- 3.6. The sites identified through the AAP Call for Sites are set out in table 1 below. Sites identified in the Local Plan Call for Sites that were not allocated in the Local Plan are identified in table 2. Remaining sites from the 2017 SHLAA are identified in table 3. Two additional sites have been identified by officers, and are set out in table 4. The table indicates where sites can be immediately excluded from further consideration due to obvious unsuitability.

Table 1: Sites identified in the Area Action Plan Call for Sites					
Site	Proposed Primary Use	Core or Wider Area	2017 SHLAA Reference (where applicable)	2017 SHLAA Status	Notes
6-8 St Andrews Way	Industrial	Core	17300419	Unsuitable for residential development – SIL	Consider as part of wider Empson Street SIL allocation
Ailsa Street	Gypsies and Travellers Site	Core	17300168	Site allocation	Discard – Local Plan allocation
Empson Street (eastern part)	Residential	Core	17300219	Unsuitable for residential development – SIL	Discard – Local Plan safeguards site for SIL – Empson Street SIL to be considered as single unit for industrial allocation
Gillender Street (southern part)	Gypsies and Travellers Site	Core	17300239	Potential development	Consider as part of wider Gillender Street allocation – retaining LIL function
Leven Road	Gypsies and Travellers Site	Core	17300298	Site allocation	Discard – Local Plan allocation
Oban Street	Gypsies and Travellers Site	Core	17300208/17300321	Potential development	Consider as part of Blackwall Trading Estate/Moody Wharf allocation – retaining LIL function
Orchard Place	Residential	Core	N/A	N/A	Consider for allocation
Anchor Wharf	Residential	Wider	17300073	Potential development	Consider as part of wider Devons Road allocation – pre-app already held on this site
Belton Way and Gale Street	Residential	Wider	17300012/17300319 (presumed, no map	Low probability – Poplar HARCA site	Consider as part of wider Devons Road

			provided through Call for Sites)		allocation
Bow Common Lane	Residential	Wider	17300070	Site allocation	Discard – Local Plan allocation, no clear rationale for re-allocating in AAP.
Bow Common Lane	Gypsies and Travellers Site	Wider	17300070	Site allocation	Discard – Local Plan allocation
Devons Road and Fern Street	Residential	Wider	17300016	Low probability – site includes social housing and open space	Consider as part of wider Devons Road allocation
North Devons Road and Campbell Road	Residential	Wider	17300091/17300138	Low probability – Poplar HARCA site	Consider as part of wider Devons Road allocation
Stroudley Walk	Residential	Wider	17300428	Approval	Consider as part of wider Stroudley Walk allocation
Twelvetreets Crescent (car wash site)	Gypsies and Travellers Site	Wider	17300442	Unsuitable for residential development	Discard – unsuitable for residential, current hotel permission

**Table 2: Sites identified in the Local Plan Call for Sites (Local Plan site allocation excluded)**

Site	Proposed Primary Use	Core or Wider Area	2017 SHLAA Reference (where applicable)	2017 SHLAA Status	Notes
72-90 Chrisp Street	Gypsies and Travellers Site	Core	N/A	N/A	Consider for allocation
Bow Enterprise Park, Cranwell Close	Gypsies and Travellers Site	Core	17300128	Approval	Discard – under development
Orchard Wharf	Safeguarded Wharf	Core	17300260	Unsuitable for residential development –	Consider allocation in order to protect safeguarded wharf

				safeguarded wharf	element
Twelvetreecrescent Crescent (between Gillender Street and Limehouse Cut)	Gypsies and Travellers Site	Core	17300443	Excluded – school site	Discard – school site
Union Wharf, Hercules Wharf and Castle Wharf	Residential	Core	17300261	Approval	Discard – under development

Table 3: Additional sites identified in 2017 SHLAA (Local Plan site allocations and sites identified in tables 1 and 2 excluded)				
Site	Core or Wider Area	2017 SHLAA Reference	2017 SHLAA Status	Notes
Trinity Buoy Wharf	Core	17300259	Potential development – office and retail	Consider for allocation
City Island	Core	17300397	Approval	Discard – under development
Former Petrol Station, Leamouth Road	Core	17300122	Approval	Discard – under development
Council Depot	Core	17300123	Low probability	Consider for allocation
Aberfeldy	Core	17300035	Approval	Consider for allocation – site is under development, but with discussions for alterations to later phases.
Portree Street	Core	17300365	Low probability – Poplar HARCA site	Consider for allocation with Oban House
Oban House	Core	17300340	Low Probability – Poplar HARCA site	Consider for allocation with Portree Street
Blackwall Trading Estate and Moody Wharf	Core	17300321/17300208	Potential Development - LIL	Consider for allocation – retaining LIL function
Glaucus Works, Leven Road	Core	17300241	Approval	Discard - recently developed
Gillender Street	Core	17300239/17300210	Potential Development – LIL	Consider for allocation –

				retaining LIL function
Teviot South	Core	17300430/17300431	Low Probability – Poplar HARCA site	Consider as part of wider Teviot allocation
Multiple sites at North Teviot	Core	17300338/17300099/ 17300445/17300135/ 17300353	Low Probability – Poplar HARCA sites and publicly accessible open space	Consider as part of wider Teviot allocation
160-166 Chrisp Street	Core	17300005	Approval	Discard – recently developed
Multiple sites at Empson Street SIL	Core	17300403/17300419/ 17300404/17300219	Unsuitable for residential development - SIL	Consider as SIL allocation
Morris Road/Limehouse Cut	Core	17300398	Excluded – heritage value	Discard – excluded from SHLAA for heritage reasons
Coventry Cross West and East	Core	17300125/17300124	Low Probability – Poplar HARCA site	Consider for allocation
Enterprise Business Park	Core	17300473	Excluded – recently developed	Discard – recently developed
Caspian Works	Core	17300096	Excluded – recently developed	Discard – recently developed
Part of East India DLR Station	Wider	17300349	Unsuitable for residential development	Discard – unsuitable for development
2 Clove Crescent	Wider	17300014	Approval	Discard – recently developed
Former St Andrew’s Hospital, Devas Street	Wider	17300235	Excluded – recently developed and publicly accessible open space	Discard – recently developed
Multiple sites north of railway line at Bromley-by-Bow	Wider	17300466/17300265/ 17300065/17300084	Low probability – Poplar HARCA sites	Consider as part of wider allocation around Stroudley Walk
Multiple sites south of Bow Road	Wider	17300427/17300083/ 17300061/17300268	Low Probability – Poplar HARCA sites	Consider as part of wider allocation around Stroudley Walk
Old Palace Primary School	Wider	17300424	Excluded – school site	Discard – school site



Crossways Estate, Rainhill Way	Wider	17300352/17300131/ 17300372	Excluded – recent development, social housing, and proximity to railway tracks	Discard – unsuitable for development
Cordelia Street	Wider	17300119	Excluded – multiple ownership	Discard – complex ownership patterns
Godalming Road	Wider	17300243	Excluded – multiple ownership	Discard – complex ownership patterns
St Saviour's School	Wider	17300105	Excluded – school site	Discard – school site
83 Barchester Street	Wider	17300029	Approval	Discard – under development
Land at Phoenix works	Wider	17300283	Approval	Discard – under development
Watts Grove Depot, Glaucus Street	Wider	17300459	Approval	Consider as part of wider Devons Road allocation
Essex Coachways, Hagwood Street	Wider	17300223	Potential Development	Consider as part of wider Devons Road allocation
Glaucus Street/Violet Road	Wider	17300396	Potential Development	Consider as part of wider Devons Road allocation
Multiple sites south of Devons Road	Wider	17300429/17300358/ 17300319	Low Probability – Poplar HARCA sites	Consider as part of wider Devons Road allocation
Multiple sites north of Devons Road	Wider	17300016/17300012/ 17300011	Low Probability – Poplar HARCA sites	Consider as part of wider Devons Road allocation

**Table 4: Additional sites identified by officers**

Site	Core or Wider Area	Notes
Site south of Lea Crossing at Orchard Place	Core	Consider in conjunction with site at Orchard Place suggested through AAP Call for Sites
Nairn Street Estate	Core	Consider for allocation

3.7. Existing Local Plan site allocations were discarded – these sites have only just been allocated in the new Local Plan, which is very recently adopted at the time of writing. Sites that were excluded from the SHLAA were discarded, as the reasons for these exclusions are considered to still be accurate. Sites where development has recently finished, construction is underway, or where permission was recently granted, were discarded unless officers had knowledge that developers were intending to apply for further changes to these permissions. These reasons are given in the ‘notes’ column of the above tables.

3.8. Notwithstanding the NPPF and London Plan encouragement to allocate small sites, in a number of cases smaller sites were collated together into larger sites for further assessment. These sites are generally owned by Tower Hamlets and Poplar HARCA, and due to this concentrated land ownership, comprehensive redevelopment (or at least the comprehensive consideration of these sites as a whole) would represent a more efficient use of land than arbitrarily splitting areas up into smaller plots and risking uneven, inefficient piecemeal development. If, in the event of further analysis, it appears that parts of these larger sites are suitable, available, and achievable as site allocations, while other parts are not, some disaggregation of the sites could take place – as long as this still demonstrated a comprehensive consideration of the wider site area in any site allocations.

3.9. The final list of sites within the AAP core area were selected for further analysis is set out below:

- Empson Street SIL
- Gillender Street LIL
- Blackwall Trading Estate LIL
- Orchard Place (and site directly to the south)
- 72-90 Chrisp Street
- Orchard Wharf (Safeguarded Wharf)
- Trinity Buoy Wharf (Non-Residential)
- Council Depot, Leamouth Road
- Aberfeldy Estate
- Nairn Street Estate
- Oban House and Portree Street
- Teviot Estate
- Coventry Cross Estate

3.10. Some sites within the wider area were also considered potentially suitable for allocation, if the core area were to be extended. These are:

- Estates around Devons Road
- Estates around Stroudley Walk

3.11. The primary purpose of the wider area was to contribute to the evidence base for policies and site allocations in the core area – due to activities and facilities in one affecting the other,

and vice-versa. However, consideration was given to potentially extending the core area if there was a strong justification to do so. In both cases, however, it is felt that this strong justification has not been forthcoming. At the AAP Call for Sites, only a very small site within the proposed Stroudley Walk allocation was put forward, with seemingly no interest in the more comprehensive redevelopment of the surrounding area. Within the proposed Devons Road allocation, three fragmented sites were put forward, along with an early draft of a potential masterplan for the wider area. The full masterplan, if implemented, would require the core area of the AAP to extend beyond even the current wider area boundary. Combined with the lack of previous discussion around the regeneration of these estates, it was felt that neither site presented a strong justification for extending the AAP core area, and that both would be better considered at a future Local Plan review.

- 3.12. In addition, extending the core area runs the risk of creating a confusing 'patchwork' of overlapping policy documents. The core area is currently entirely within two Opportunity Area Planning Frameworks (OAPFs) – for the Lower Lea Valley and the Isle of Dogs and South Poplar. Extending it westwards for the Devons Road site would extend it into an area which is not currently an OAPF. Extending the core area northward for the Stroudley Walk site would overlap with the area for the GLA's 2012 Olympic Legacy SPG, which itself supersedes the Lower Lea Valley OAPF in that area.
- 3.13. Consequently, it was decided not to extend the AAP core area, and to only consider further the sites within the existing core area. These will be assessed in more detail in the next section.

## 4. Site Assessments

4.1. The Planning Practice Guidance on Housing and Economic Land Availability Assessment sets out that sites should be suitable, available, and achievable.

4.2. The guidance states that a site is suitable if “it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated”. This could include considering:

- Site size, boundaries, and location
- Current land use and character, and those of the surrounding area
- Physical constraints such as access, contamination, slopes, flood risk, significant natural features, location of infrastructure and utilities
- Consistency with the development plan’s policies
- Proximity to services and public transport
- Development progress
- Initial assessment of whether a site is suitable for a particular type of use
- National policy
- Appropriateness and likely market attractiveness for the proposed development
- Contribution to regeneration priority areas
- Potential impacts upon landscape features, nature, and heritage conservation

4.3. The guidance sets out that a site is available if “there is confidence that there are no legal or ownership impediments to development”.

4.4. In terms of achievability, the guidance states that “this is essentially a judgement about the economic viability of a site”.

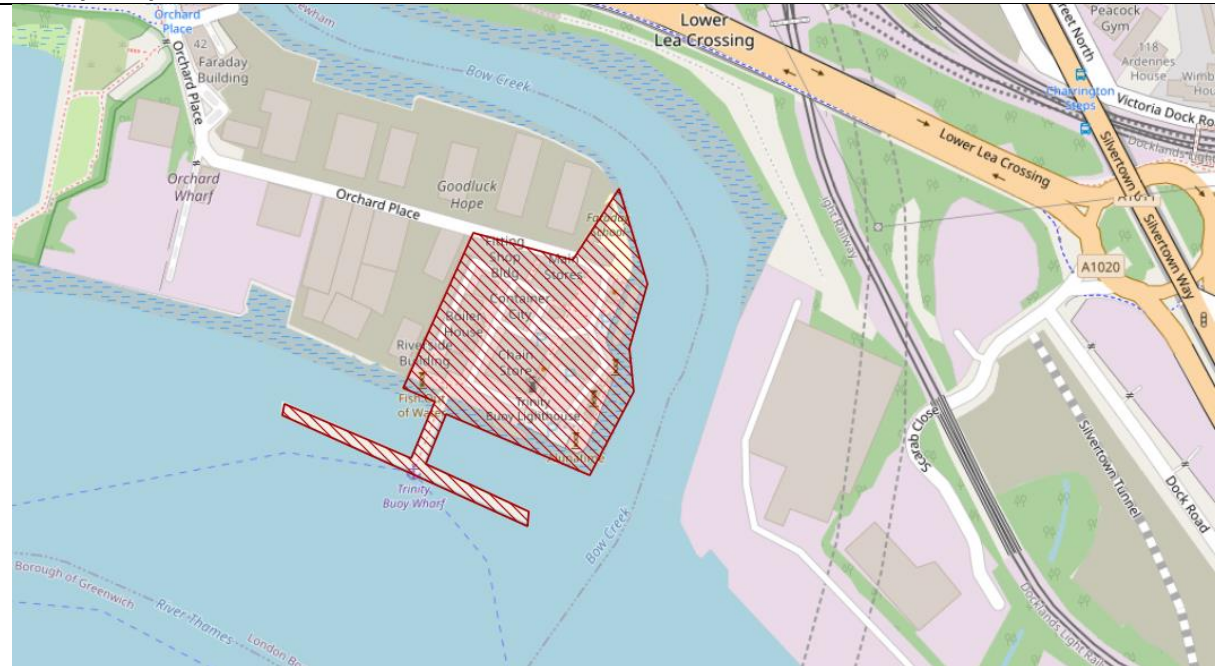
4.5. The following pages will set out initial assessments of the identified sites in terms of their suitability. Where sites are identified to be potentially suitable for allocation, further exploration can then be taken forward of their availability, through discussions with landowners; and their achievability, through a viability assessment of the selected sites.

4.6. To determine the suitability of the sites, each assessment will set out (where known):

- Site location
- Site size
- Current use and directly surrounding uses
- Flood risk
- Air quality
- Nature/biodiversity designations
- Employment designations
- Town centre designations
- Heritage designations

- Public Transport Accessibility Level
- Proximity to existing education and health services
- Access to open space (within 400m)
- Ownership
- Recent planning history

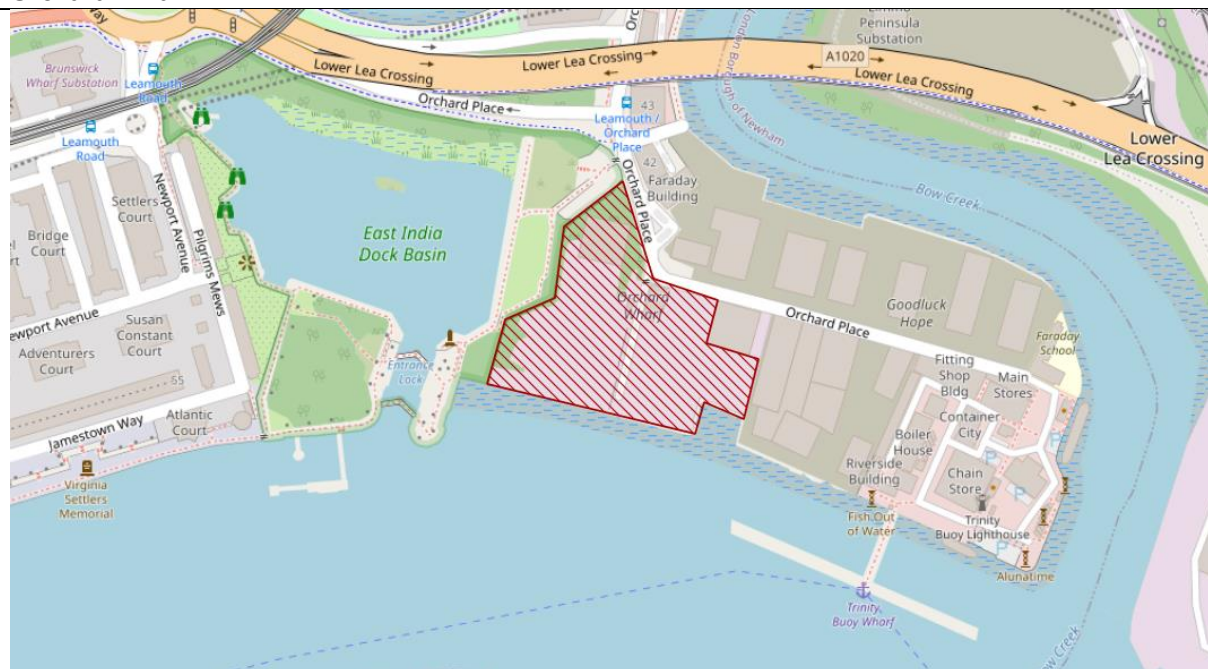
## Trinity Buoy Wharf



Location	Orchard Place, Leamouth Peninsula
Size (ha)	1.3
Current use	Mixed: offices, educational, restaurant, transport pier, art galleries.
Surrounding uses	At Hercules Wharf, a new housing development is under construction; across the river Lea, industrial sites and the Lower Lea Crossing.
Flood risk	Flood zone 3a
Air quality	The whole borough is an Air Quality Management Area; however, there are no further identified issues with air quality on this site.
Nature/biodiversity designations	The site is adjacent to the river Thames and Lea SINCs, so presents potential biodiversity opportunities. The next-closest SINC is East India Dock Basin.
Employment designations	None; but the site currently hosts several employment uses.
Town centres	London City Island neighbourhood centre Chrisp Street district centre
Heritage	The site is within the Limmo archaeological priority area; the Lighthouse Block on the site is Grade II listed.
PTAL	1b (base) 1b (2021) 1b (2031)
Education and health services	Faraday school (0.1 miles)
Access to open space	East India Dock Basin
Ownership	LBTH/Trinity Buoy Wharf Trust (leaseholder)
Recent planning history	20/08/2019 – application for the approval of reserved matters in respect of prior outline planning permission on Phase One – Royal Drawing School. 14/12/2018 – outline planning permission for demolition of buildings, additional creative SMR Use class B1 workspace, relocation and additional floor space for School, additional

	<p>floorspace to studios to Royal Drawing School</p> <p>16/11/2018 – minor material amendment of planning 2016 planning permission, with alteration in design of roof of the terminal.</p> <p>18/10/2016 – replacement of one element of Pier with main deck and waiting room, office and ancillary accommodation, below deck ballast and storage.</p>
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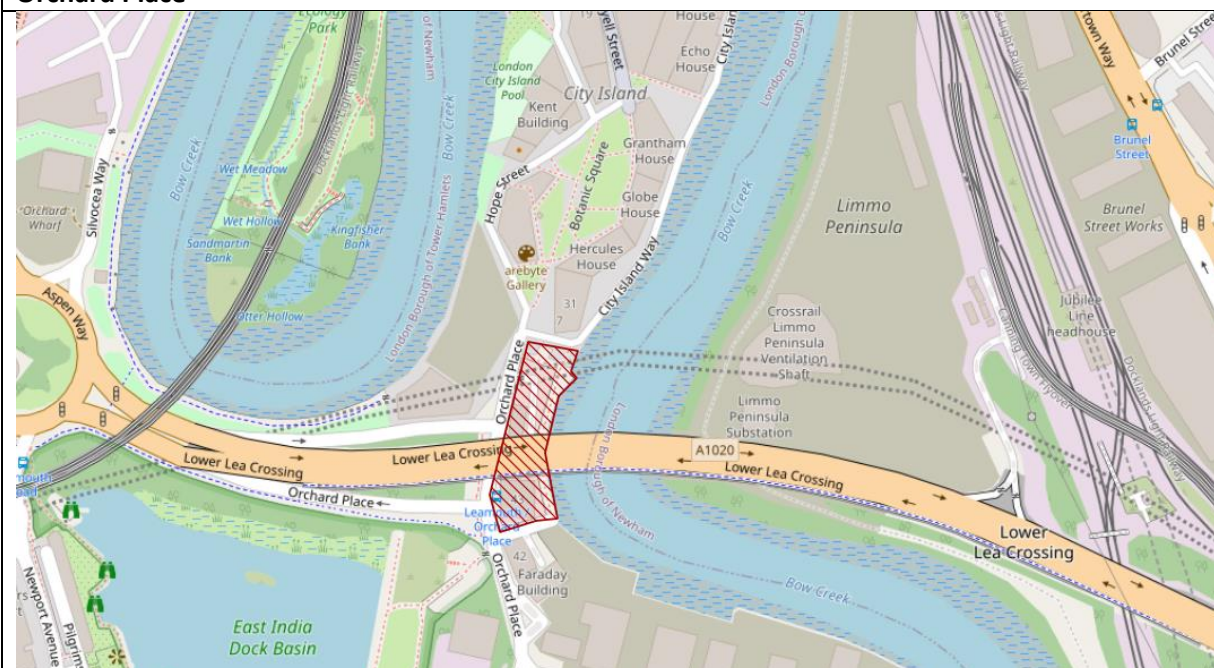
## Orchard Wharf



Location	Orchard Place, Leamouth Peninsula
Size (ha)	1.4
Current use	Safeguarded wharf, vacant since at least 2002
Surrounding uses	At Hercules Wharf, a new housing development is under construction; East India Dock Wharf open space is to the west of the site.
Flood risk	Flood zone 3a
Air quality	The whole borough is an Air Quality Management Area; however, there are no further identified issues with air quality on this site.
Nature/biodiversity designations	The site is adjacent to East India Dock Basin SINC; and to the river Thames SINC, although if the site is brought back into use as a working wharf, biodiversity opportunities related to the Thames are likely to be limited.
Employment designations	None; but as a safeguarded wharf, the site has the potential to host employment uses.
Town centres	London City Island neighbourhood centre Chrisp Street district centre
Heritage	The site is within the Limmo archaeological priority area.
PTAL	1b (base) 1b (2021) 1b (2031)
Education and health services	Faraday School (0.2 km), Woolmore Primary School (0.9km)
Access to open space	East India Dock Basin Virginia Quay
Ownership	Ballymore Group
Recent planning history	02/10/2012 – erection of concrete batching plant, cement storage terminal and aggregate storage facilities, together with associated structures and facilities, walkway and landscaping, jetty and ship to shore conveyor – refused.

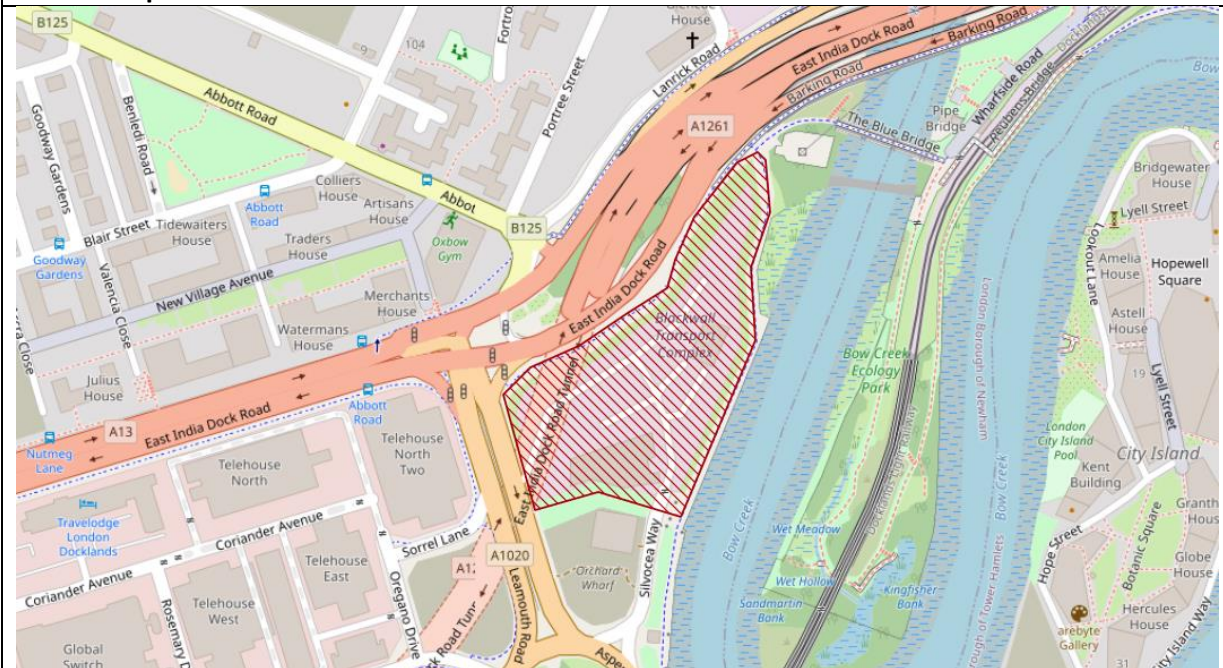


## Orchard Place



Location	Orchard Place, Leamouth Peninsula
Size (ha)	0.2
Current use	Operations centre
Surrounding uses	London City Island, a large new housing development, to the north. Safeguarded Orchard Wharf to the south. East India Dock basin open space to the southwest. Hercules Wharf, a new housing development under construction to the southeast. The Lower Lea Crossing cuts across the site.
Flood risk	Flood zone 3a
Air quality	The whole borough is an Air Quality Management Area; this site is also identified as having particularly high levels of NO <sub>2</sub> , due to its proximity to the Lower Lea Crossing.
Nature/biodiversity designations	The site is adjacent to East India Dock Basin SINC; and adjacent to the river Lea SINC, which presents potential biodiversity opportunities.
Employment designations	None
Town centres	Site is partially within London City Island neighbourhood centre. Crisp Street district centre
Heritage	The site is within the Limmo archaeological priority area.
PTAL	2 (base) 2 (2021) 2 (2031)
Education and health services	Faraday School (0.3 km), Culloden Primary School (0.9km), Woolmore Primary School (0.9km)
Access to open space	Castle Wharf (small open space along the river) East India Dock Basin
Ownership	Transport for London
Recent planning history	N/A

## Council Depot

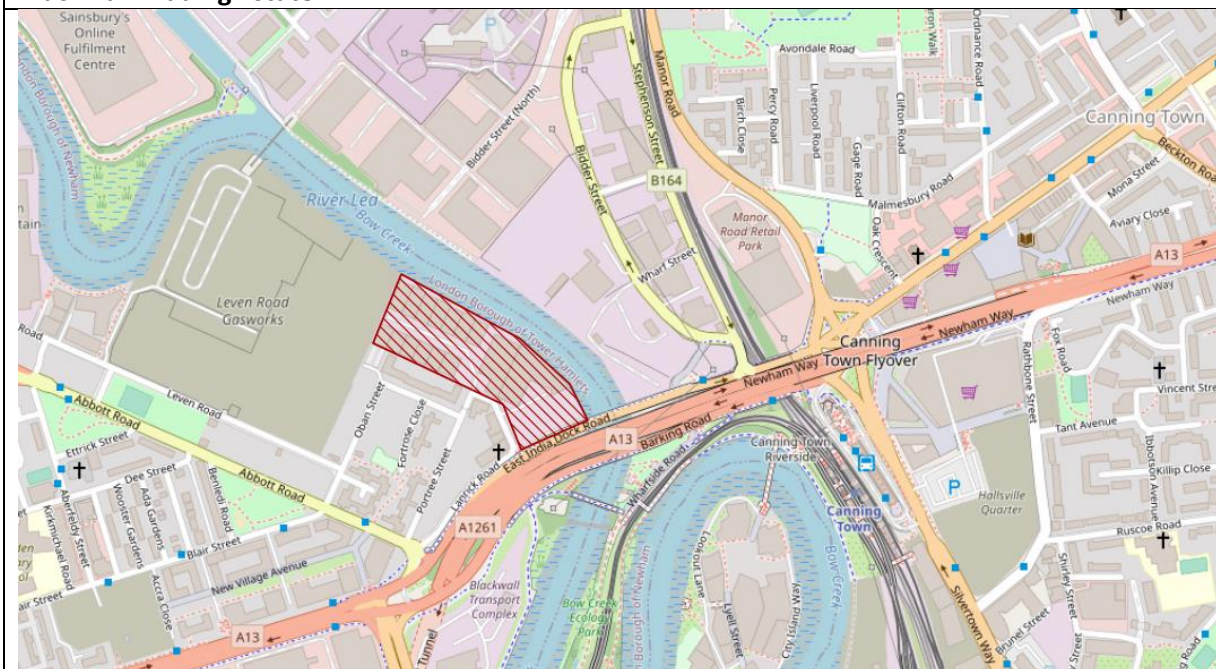


Location	Leamouth Road
Size (ha)	2.2
Current use	Depot for Tower Hamlets Council vehicles.
Surrounding uses	To the south, a new housing development is under construction on the former petrol station site. To the west and north, East India Dock Road presents a barrier. Across the river Lea is the Bow Creek Ecology Park and the DLR tracks.
Flood risk	At the edges of the site there are some areas of floor zone 3a and 3b; the majority of the site is flood zone 2.
Air quality	The whole borough is an Air Quality Management Area; this site is also identified as having particularly high levels of NO <sub>2</sub> , due to its proximity to East India Dock Road and the Lower Lea Crossing.
Nature/biodiversity designations	The site is adjacent to the river Lea SINC, so presents potential biodiversity opportunities. The next-closest SINCS are East India Dock Basin, and the Bow Creek Ecology Park (in Newham, accessible by a nearby bridge).
Employment designations	None; but the site currently hosts some employment activity.
Town centres	London City Island neighbourhood centre Aberfeldy neighbourhood centre Chrisp Street district centre
Heritage	The site is within the Limmo archaeological priority area.
PTAL	4-5 (base) 4-5 (2021) 4-5 (2031)
Education and health services	Woolmore Primary School (0.7km), Faraday School (0.8km), Culloden Primary Academy (0.6km)  Aberfeldy Practice (0.5km).
Access to open space	East India Dock Basin Bow Creek Ecology Park (Newham)

	Abbott Road Gardens Braithewaite Park
Ownership	LBTH
Recent planning history	08/12/2014 – external refurbishment works on entire site, creation of additional parking spaces. Addition of new above ground fuel tank, erection of new gate. 15/05/2019 – erection of modular building to act as office accommodation for temporary period of 5 years.



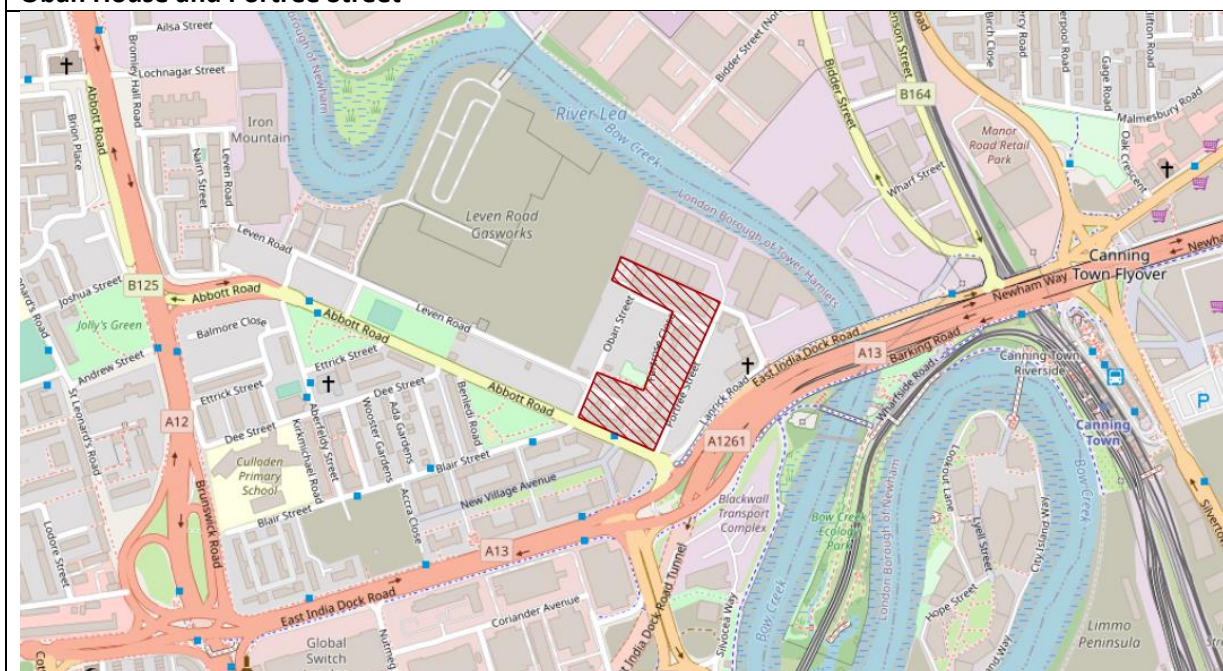
## Blackwall Trading Estate



Location	Oban Street
Size (ha)	1.74
Current use	Industrial, warehousing
Surrounding uses	The large Leven Road site allocation is to the west – the site is currently vacant industrial land, but will host a large housing development; Poplar HARCA-owned housing estates to the south, along with East India Dock Road presenting a barrier.
Flood risk	Flood zone 3a
Air quality	The whole borough is an Air Quality Management Area; the south-eastern edge of this site (Moody Wharf) is also identified as having particularly high levels of NO2, due to its proximity to East India Dock Road.
Nature/biodiversity designations	The site is adjacent to the river Lea SINC, so presents potential biodiversity opportunities. The next-closest SINC is the Bow Creek Ecology Park (in Newham, accessible by a nearby bridge).
Employment designations	The site is designated as a Local Industrial Location.
Town centres	Aberfeldy neighbourhood centre Chrisp Street district centre
Heritage	The site is within the Lea Valley archaeological priority area.
PTAL	1b-3 (base) 1b-3 (2021) 1b-3 (2031)
Education and health services	Woolmore Primary School (0.8km), Faraday School (0.8km), Langdon Park School (0.9km), Culloden Primary Academy (0.5km) Aberfeldy Practice (0.5km)
Access to open space	Bow Creek Ecology Park (Newham) Abbott Road Gardens Braithewaite Park Leven Road Park
Ownership	Various

Recent planning history	01/11/2018 – Unit 10, instillation of rooftop plant and minor elevation alterations.
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## Oban House and Portree Street



Location	Oban Street, Portree Street
Size (ha)	1.5
Current use	Residential
Surrounding uses	The large Leven Road site allocation is to the west – the site is currently vacant industrial land, but will host a large housing development; Poplar HARCA-owned housing estates to the south-west; East India Dock Road presents a barrier to the east.
Flood risk	Flood zone 3a
Air quality	The whole borough is an Air Quality Management Area; the south-eastern edge of this site is also identified as having particularly high levels of NO <sub>2</sub> , due to its proximity to East India Dock Road.
Nature/biodiversity designations	None; the closest SINCs are the river Lea and the Bow Creek ecology Park (in Newham, accessible by a nearby bridge).
Employment designations	None; adjacent to the Blackwall Trading estate LIL.
Town centres	Aberfeldy neighbourhood centre Chrisp Street district centre
Heritage	The site is within the Lea Valley archaeological priority area.
PTAL	2-3 (base) 2-3 (2021) 2-3 (2031)
Education and health services	Langdon Park School (0.8km), Woolmore Primary School (0.7km), Culloden Primary Academy (0.4km) Aberfeldy Practice (0.3km)
Access to open space	Abbott Road Gardens Braithewaite Park Leven Road Park Aberfeldy Millennium Green Bow Creek Ecology Park (Newham)
Ownership	Poplar HARCA/Eco World
Recent planning history	16/07/2011 – feature entrance panel to communal entrances,

	canopies to communal and private entrances, enhanced lighting, improved pedestrian routes, enclosures for recycling, new Urban Square, upgrading building fabric.
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## Aberfeldy Estate



Location	Between the A12 and A13
Size (ha)	14.3
Current use	Residential; retail; education.
Surrounding uses	Leven Road and Ailsa Street site allocations are to the north, and will host large housing developments; the Blackwall Local Employment Location is to the south. The Blackwall Tunnel Approach Road and East India Dock Road form major barriers around the site.
Flood risk	Flood zone 3a
Air quality	The whole borough is an Air Quality Management Area; and much of this site (with the exception at the northern edge, along Abbott Road) is also identified as having particularly high levels of NO <sub>2</sub> , due to its proximity to East India Dock Road and the Blackwall Tunnel Approach Road.
Nature/biodiversity designations	None; the closest SINC's are the river Lea; Bow Creek ecology Park (in Newham, accessible by a nearby bridge); East India Dock Basin; and Saffron Avenue Pond.
Employment designations	None; adjacent to Blackwall LEL.
Town centres	Aberfeldy neighbourhood centre is within this site. Crisp Street district centre
Heritage	The site is within the Lea Valley archaeological priority area. The site is adjacent to the Balfron Tower Conservation Area, across the Blackwall Tunnel Approach Road.
PTAL	1b-4 (base) 1b-4 (2021) 1b-4 (2031)
Education and health services	Woolmore Primary School (0.3km), Langdon Park School (0.5km), Culloden Primary School (0.1km), Manorfield Primary School (0.8km), Lansbury Lawrence Primary School (0.9km), Bygrove Primary School (0.9km). Aberfeldy Practice (0.1km)



Access to open space	<p>The site contains four publicly accessible open spaces:</p> <p>Abbott Road Gardens</p> <p>Braithewaite Park</p> <p>Aberfeldy Millennium Green</p> <p>Aberfeldy Playground</p> <p>The site is also close to:</p> <p>Jolly's Green</p> <p>Leven Road Park</p> <p>East India Dock Square</p>
Ownership	Poplar HARCA/Eco World
Recent planning history	<p>16/08/2011 – remodelling of Culloden Primary School to facilitate expansion from two form to three form entry.</p> <p>20/06/2012 – outline planning application for mixed-use of the existing Aberfeldy estate, involving the creation of 1,176 residential units.</p> <p>20/06/2012 – Phase 1 planning application for the erection of three blocks between 4 and 10 storeys on the corner of Abbott Road and East India Dock Road to provide 342 new residential units.</p> <p>15/07/2015 – minor material amendment to 2012 application.</p>

## Nairn Street Estate



Location	Leven Road
Size (ha)	1.6
Current use	Residential
Surrounding uses	The Ailsa Street site allocation is to the north and east, and will host a large new housing development; the redeveloping Aberfeldy Estate is to the south; the Teviot Estate is to the west, but divided from this site by the barrier of the Blackwall Tunnel Approach Road.
Flood risk	Flood zone 3a
Air quality	The whole borough is an Air Quality Management Area; and this entire site is also identified as having particularly high levels of NO <sub>2</sub> , due to its proximity to the Blackwall Tunnel Approach Road.
Nature/biodiversity designations	None; the closest SINC is the river Lea.
Employment designations	None
Town centres	Aberfeldy neighbourhood centre Chrisp Street district centre
Heritage	The site is within the Lea Valley archaeological priority area. The site is adjacent to the Grade II listed Bromley Hall School.
PTAL	1b (base) 1b (2021) 1b (2031)
Education and health services	Langdon Park School (0.3km), Manorfield Primary School (0.4km), Lansbury Lawrence Primary School (0.7km), Woolmore Primary, Bow School (0.8km), Culloden Primary School (0.3km). Aberfeldy Practice (0.2km)
Access to open space	The site is identified as within an area of deficiency of access to nature. Aberfeldy Millennium Green Leven Road Park Aberfeldy Playground

	Jolly's Green (across the Blackwall Tunnel Approach Road) Langdon Park (across the Blackwall Tunnel Approach Road)
Ownership	Poplar HARCA/Eco World
Recent planning history	21/12/2000 – External refurbishment including communal areas and stairs, revised entrance canopies, refuse arrangements, external works and parking arrangements.

## Teviot Estate

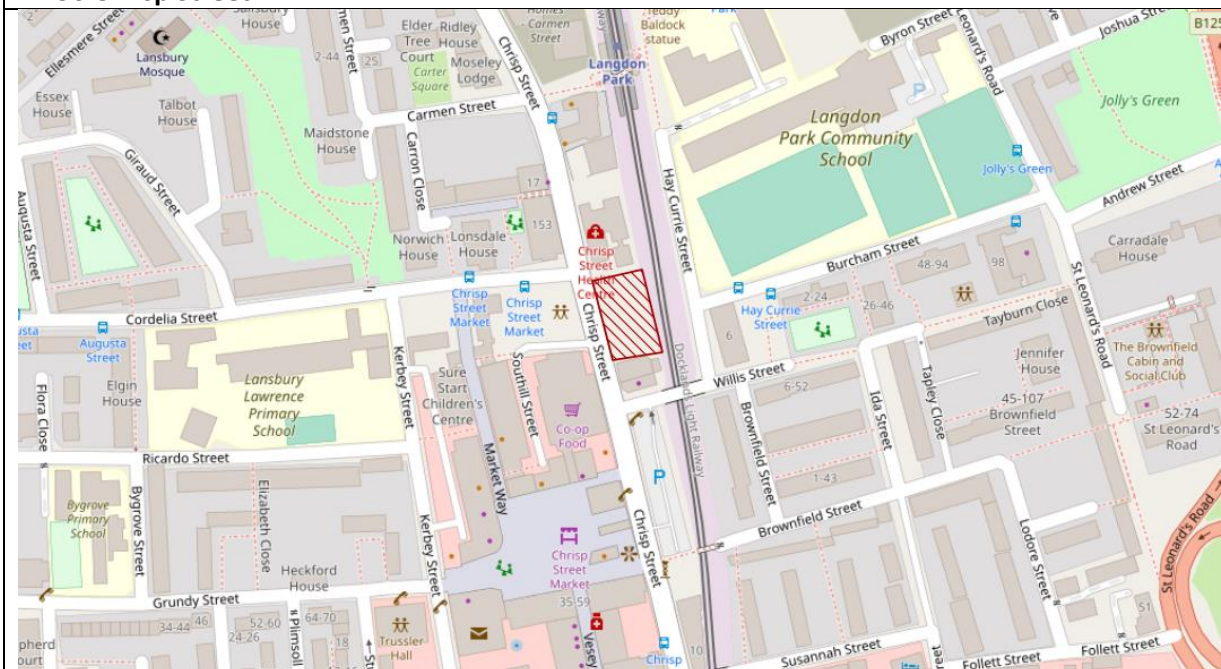


Location	West of the A12
Size (ha)	7
Current use	Residential
Surrounding uses	Housing to the west and south; Empson Street SIL to the north; Gillender Street LIL and the Ailsa Street site allocation to the east, providing a combination of housing and industrial uses. The site is surrounded by significant barriers – the Blackwall Tunnel Approach Road, DLR tracks, and the Limehouse Cut canal.
Flood risk	Eastern part of the site contains areas of flood zone 2 and 3a.
Air quality	The whole borough is an Air Quality Management Area; and the eastern part of this site is also identified as having particularly high levels of NO <sub>2</sub> , due to its proximity to the Blackwall Tunnel Approach Road.
Nature/biodiversity designations	Site is adjacent to the Limehouse Cut SINC.
Employment designations	None; site is adjacent to Empson Street SIL and Gillender Street LIL, although both are somewhat cut off from the site by the canal and main road respectively.
Town centres	Chrisp Street district centre
Heritage	Langdon Park Conservation Area is partially within the site; site is adjacent to Limehouse Cut Conservation Area; Grade II listed St Michael's Court is within the site; the site is within the Lea Valley archaeological priority area.
PTAL	2-4 (base) 2-5 (2021) 2-5 (2031)
Education and health services	Langdon Park School (0.2km), Manorfield Primary School (0.1km), Lansbury Lawrence Primary School (0.5km), Bygrove Primary School (0.6km), Woolmore Primary School (0.8km), Bow School (0.7km), St Paul's Way Trust School (0.8km), Culloden Primary Academy (0.6km).

	Aberfeldy Practice (0.6km), St Andrews Health Practice (0.7km)
Access to open space	The southern part of the site is identified as within an area of deficiency of access to nature. The site contains Langdon Park and Wyvis Street Open Space, and is adjacent to the Lee Valley Region Park along the Limehouse Cut. Jolly's Green
Ownership	Poplar HARCA
Recent planning history	07/05/2010 – David House – erection of three buildings from three to four storeys to provide 24 residential units. 15/12/2011 – Tweed House – Demolition of existing building on site and erection of a new building ranging in 6 to 13 storeys in height to provide 115 new residential units. 15/12/2015 – Lime Home Lofts – erection of two 5 bedroom terraced houses over 4 storeys including basement. 02/07/2019 – Brion Place Garages – erection of part one/ part two storey shipping container development to provide affordable employment space. Change of use of 15 existing garages to provide affordable workspace / cycle parking / storage. Temporary for period of 5 years.



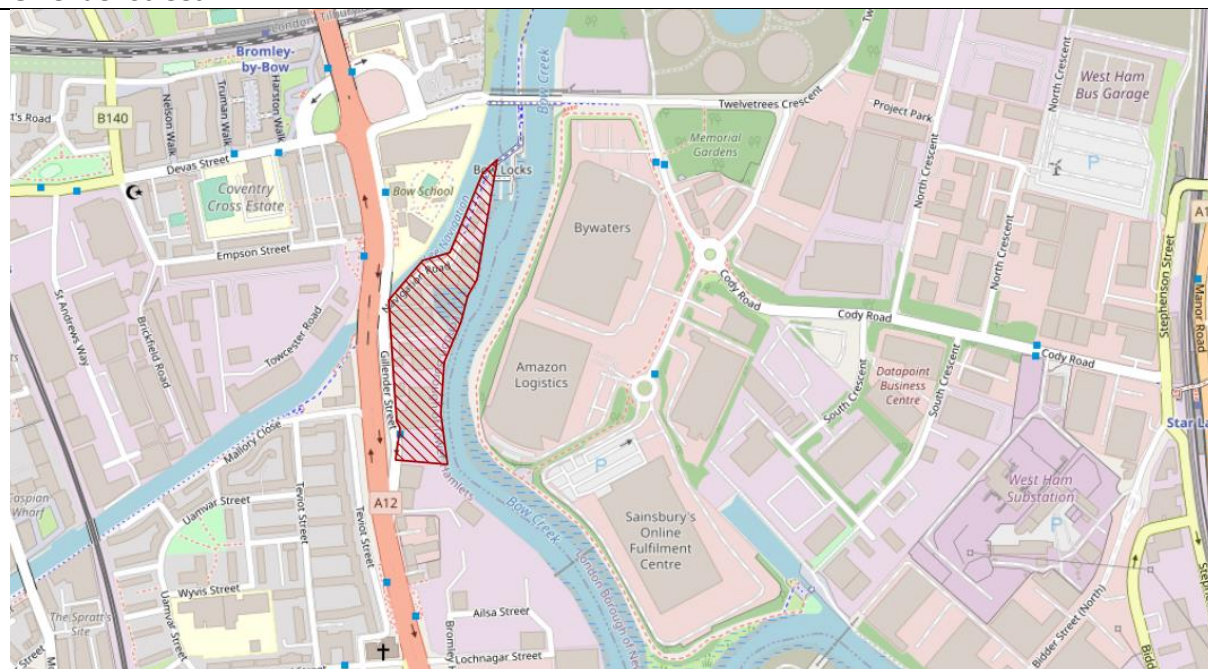
## 72-90 Crisp Street



Location	Crisp Street
Size (ha)	0.1
Current use	Market storage
Surrounding uses	A health centre is adjacent to the site to the north; and Crisp Street district centre is directly to the west, with a range of retail and community uses; a site allocation in the district centre will see more housing added; further housing is to the north-west. The DLR tracks to the east separate the site from the lower part of the Teviot Estate.
Flood risk	Flood zone 2
Air quality	The whole borough is an Air Quality Management Area; and this entire site is also identified as having particularly high levels of NO <sub>2</sub> , due to its proximity to Crisp Street.
Nature/biodiversity designations	None; the closest SINC is Robin Hood Gardens.
Employment designations	None; but the site is currently used for some employment functions, and is within a town centre that provides employment.
Town centres	The site is within Crisp Street district centre.
Heritage	The site is adjacent to the Lansbury Conservation Area; and the Balfron Tower Conservation Area (although this is across the DLR tracks. The site is within the Lea Valley archaeological priority area.
PTAL	4 (base) 4 (2021) 4 (2031)
Education and health services	Lansbury Lawrence Primary School (0.2km), Bygrove Primary School (0.3km), Langdon Park School (0.2km), Woolmore Primary School (0.5km), Culloden Primary Academy (0.3km), St Paul's Way Trust School (0.9km). Aberfeldy Practice (0.6km)
Access to open space	The site is identified as within an area of deficiency of access to

	<p>nature.</p> <p>Chrisp Street Market Area</p> <p>Alton Street Public Space</p> <p>All Saints Churchyard</p> <p>Poplar Recreation Ground</p> <p>Jolly's Green</p> <p>Langdon Park</p>
Ownership	London Borough of Tower Hamlets
Recent planning history	None

## Gillender Street



Location	Between the A12 and the river Lea
Size (ha)	2.2
Current use	Industrial; residential
Surrounding uses	Ailsa Street site allocation to the south, which will host a large new housing development; the area directly adjacent to the site in the south is a safeguarded waste site; Teviot Estate residential to the west; Empson Street SIL to the north-west; a school site to the north; and a SIL site in Newham across the river Lea to the east. The site is hemmed in between the Blackwall Tunnel Approach Road, the river Lea, and the Limehouse Cut canal.
Flood risk	North of the site is in flood zone 3b; east of the site is in flood zone 3a; most of the rest of the site is in flood zone 2; a small area at the west of the site is not at risk.
Air quality	The whole borough is an Air Quality Management Area; and the south and west of this site is also identified as having particularly high levels of NO <sub>2</sub> , due to its proximity to the Blackwall Tunnel Approach Road.
Nature/biodiversity designations	The site is adjacent to the river Lea and Limehouse Cut SINC. The Bromley-by-Bow War Memorial Wood SINC is across the river Lea in Newham, and is easily accessible by bridge.
Employment designations	The southern part of the site is the Gillender Street LIL; the site is also adjacent to the Empson Street SIL.
Town centres	St Leonard's Street neighbourhood parade Chrisp Street district centre
Heritage	The site is within the Limehouse Cut Conservation Area; 25-37 Gillender Street and Dowgate Wharf are both Grade II listed buildings within the site; the site is within the Lea Valley archaeological priority area.
PTAL	3-4 (base) 3-5 (2021) 3-5 (2031)



Education and health services	Bow School (0.2km), Manorfield Primary School (0.4km), Langdon Park School (0.7km). St Andrews Health Centre (0.5km), Aberfeldy Practice (0.8km).
Access to open space	The site is adjacent to the Lee Valley Regional Park along the Limehouse Cut. Wyvis Street Open Space Twelvetreets Crescent Open Space St Andrew's Open Space
Ownership	Mount Anvil/Peabody/Prologis
Recent planning history	Existing Application – Former 23 Gillender Street, 24-26 – restoration and refurbishment of existing buildings for continued industrial use falling within Class B1c, B2 and B8 uses. 06/11/2018 – Barratt Industrial Estate – Listed Building Consent for remedial works to Grade II listed wall, redevelopment of sites at 20-22 Gillender Street for demolition of existing buildings (exception of Magnolia House) and redevelopment of the site to provide 307 residential units and for commercial floorspace. 28/09/2012 – Riverside Industrial Estate – demolition of existing storage/warehouse buildings and redevelopment to provide mixed commercial and 109 residential units within three buildings from 5/6 to 12/13 storeys.

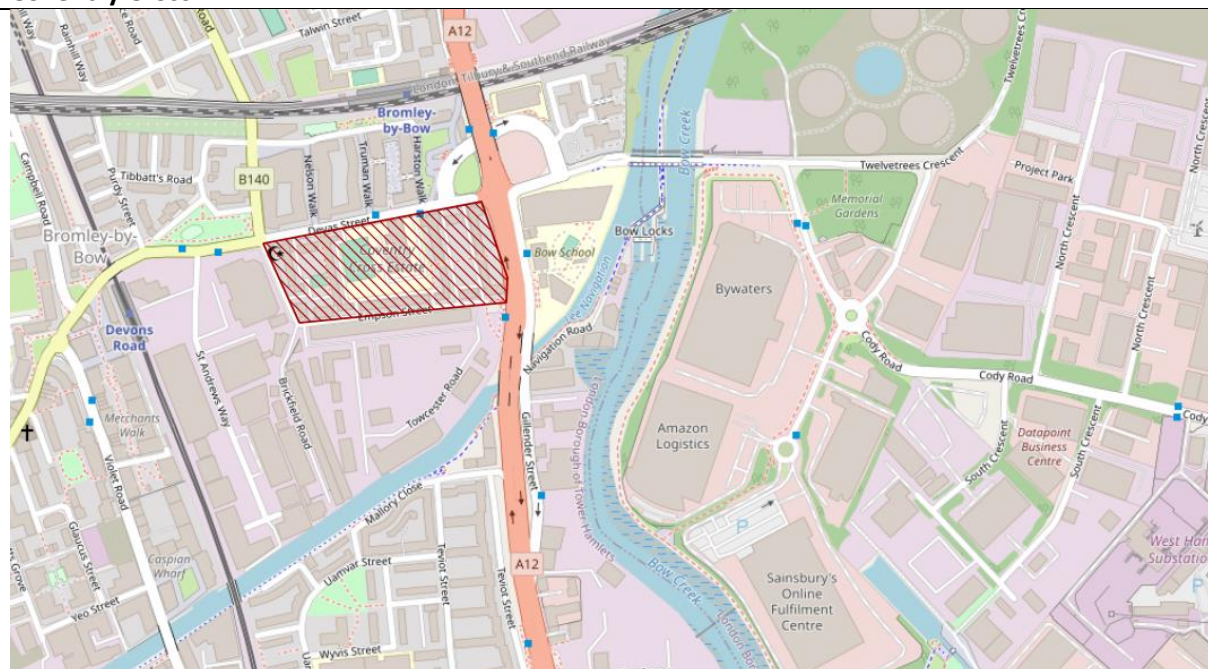
## Empson Street



Location	Between the DLR tracks, Limehouse Cut, and A12
Size (ha)	10.4
Current use	Industrial
Surrounding uses	The site is surrounded by housing on all sides, except for the east, where there is a school site and the Gillender Street LIL. The site is surrounded on three sides by the DLR tracks, Limehouse Cut canal, and Blackwall Tunnel Approach Road.
Flood risk	None.
Air quality	The whole borough is an Air Quality Management Area; and the north and east of this site is also identified as having particularly high levels of NO <sub>2</sub> , due to its proximity to the Blackwall Tunnel Approach Road and Devas Street.
Nature/biodiversity designations	The site is adjacent to the Limehouse Cut SINC.
Employment designations	The site is a SIL designation; the site is also adjacent to the Gillender Street LIL.
Town centres	Devons Road neighbourhood centre St Leonard's Street neighbourhood parade Caspian Wharf neighbourhood parade Chrisp Street district centre
Heritage	Part of the site is within the Limehouse Cut Conservation Area; the site is within the Lea Valley archaeological priority area.
PTAL	2-4 (base) 2-5 (2021) 2-5 (2031)
Education and health services	Manorfield Primary School (0.3km), Bow School (0.5km), St Paul's Way Trust School (0.6km), St Paul's Way Foundation Primary School (0.9km), Stebon Primary School (0.9km), Lansbury Lawrence Primary School (0.8km), Langdon Park School (0.7km), Bygrove Primary School (0.9km). St Andrews Health Centre (0.4km).
Access to open space	The site contains the open space known as Devons Road

	<p>Ambulance Station Grass Verge; and is adjacent to the Lee Valley Regional Park along the opposite side of the Limehouse Cut. An area of the site in the south-west is considered to be an area of deficiency of access to nature.</p> <p>Prospect Park  St Andrew's Open Space  Reeves Road Allotments  Wyvis Street Open Space  Caspian Wharf</p>
Ownership	Various
Recent planning history	Current application – replacement of existing car park and erection of self-storage facility, with associated car and cycle parking.

## Coventry Cross



Location	Devas Street
Size (ha)	3.1
Current use	Residential; educational
Surrounding uses	Empson Street SIL to the south and west; housing and a school site to the east; housing to the north. The Blackwall Tunnel Approach Road is to the east of the site, and there is no route out of the area through the SIL to the south.
Flood risk	None.
Air quality	The whole borough is an Air Quality Management Area; and the north and east of this site is also identified as having particularly high levels of NO <sub>2</sub> , due to its proximity to the Blackwall Tunnel Approach Road and Devas Street.
Nature/biodiversity designations	None; the site is close to the Limehouse Cut and river Lea SINCs.
Employment designations	None; but the site is adjacent to the Empson Street SIL.
Town centres	The site includes St Leonard's Street neighbourhood parade. Devon's Road neighbourhood centre Chrisp Street district centre
Heritage	None; the site is close to, but not adjacent to, the Limehouse Cut Conservation Area.
PTAL	4-5 (base) 5-6a (2021) 5-6a (2031)
Education and health services	Langdon Park School (0.8km), Manorfield Primary School (0.5km), Bow School (0.2km), Marner Primary School (0.1km), St Paul's Way Trust School (0.9km). St Andrews Health Centre (0.2km).
Access to open space	Twelvvetrees Crescent Open Space St Andrew's Open Space Prospect Park Devons Road Ambulance Station Grass Verge Reeves Road Allotments

	Lee Valley Regional Park Wyvis Street Open Space
Ownership	Poplar HARCA
Recent planning history	12/05/2010 - Outline application for the demolition of all of the existing buildings (bar clock tower block). Erection of 10 new blocks to provide 782 new residential flats and 1000sqm of Class A1/2/3/, B1, D1 and D2 accommodation.

4.7. A summary table below sets out the most comparable elements of these assessments.

**Summary table**

Site	Size (ha)	Flood Risk	Air Quality <sup>1</sup>	Schools less than 1km from site	PTAL (base)	Nature / Biodiversity Designation	Heritage
Trinity Buoy Wharf	1.3	Flood zone 3a	No further issues identified	1	1b	Adjacent to River Thames and Lea SINC	Limmo archaeological priority area. Lighthouse Block on site is Grade II listed.
Orchard Wharf	1.4	Flood zone 3a	No further issues identified	2	1b	Adjacent to East India Dock Basin SINC and River Thames SINC	Limmo archaeological priority area.
Orchard Place	0.2	Flood zone 3a	Particularly high levels of NO2	3	2	Adjacent to East India Dock Basin SINC and River Thames SINC	Limmo archaeological priority area.
Council Depot	2.2	Majority of site is flood zone 2	Particularly high levels of NO2	3	4-5	Adjacent to River Lea SINC	Limmo archaeological priority area.
Blackwall Trading Estate	1.74	Flood zone 3a	Particularly high levels of NO2	4	1b-3	Adjacent to River Lea SINC	Lea Valley archaeological priority area.
Oban House and Portree Street	1.5	Flood zone 3a	Particularly high levels of NO2	3	2-3	None	Lea Valley archaeological priority area.
Aberfeldy Estate	14.3	Flood zone 3a	Particularly high levels of NO2	6	1b-4	None	Lea Valley archaeological priority area.
Nairn Street Estate	1.6	Flood zone 3a	Particularly high levels of NO2	5	1b	None	Lea Valley archaeological priority area.
Teviot Estate	7	Eastern part of	Particularly high	8	2-4	Adjacent to	Lea Valley archaeological

<sup>1</sup> The whole of the borough is an Air Quality Management Area.

		site contains flood zone 2 and 3a	levels of NO2			Limehouse Cut SINC	priority area. Langdon Park Conservation Area partially within site. Grade II listed St Michael's Court within site.
72-90 Chrisp Street	0.1	Flood zone 2	Particularly high levels of NO2	6	4	None	Lea Valley archaeological priority area. Adjacent to Lansbury Conservation Area and Balfron Tower Conservation Area.
Gillender Street	2.2	North of site is in flood zone 3b, east of the site is in flood zone 3a, most of the site is in flood zone 2.	Particularly high levels of NO2	3	3-5	Adjacent to River Lew and Limehouse Cut SINC.	Lea Valley archaeological priority area. Limehouse Cut Conservation Area. Gillender Street and Dowgate Wharf are Grade II listed buildings within the site.
Empson Street	10.4	None	Particularly high levels of NO2	8	2-4	Adjacent to Limehouse Cut SINC.	Lea Valley archaeological priority area. Part of the site is within Limehouse Cut Conservation Area.
Coventry Cross	3.1	None	Particularly high levels of NO2.	5	4-5	None	None



## 5. Conclusion

- 5.1. The assessment in section 4 of this paper shows that all the sites that were assessed could be suitable for development, although mitigation would be required in all cases to overcome negative impacts of flood risk, poor air quality, or poor connectivity.
- 5.2. However, after initial discussions with landowners and developers in the area, it has become clear that some sites are unlikely to be available for development within the time period of the AAP – these include Orchard Place, Oban and Portree Street, and Coventry Cross. In the case of Gillender Street, development has already progressed significantly, and it is felt that a site allocation in the AAP would not add any value. Similarly, on Trinity Buoy Wharf a masterplan is in place for further development over a number of phases, and it is felt that a site allocation would not add value.
- 5.3. In the development of the Regulation 18 AAP, the following sites will therefore be taken forward for further consideration – Orchard Wharf, Council Depot, Blackwall Trading Estate, Aberfeldy Estate (including Nairn Street), Teviot Estate, 72-90 Chrisp Street, and Empson Street.
- 5.4. Potential options for development on these sites will be considered through the AAP evidence base and assessed through an Integrated Impact Assessment of the Regulation 18 AAP.