

Appendix 10.1: Responses to individual site allocations

Issue 10 - Are the site allocations justified by the evidence base and of sufficient detail so as to be effective in delivery?

Site allocation name: Bishopsgate Goods Yard (site allocation 1.1)
<p>Necessity, relevance and deliverability</p> <ul style="list-style-type: none">• <i>Are the criteria in the allocations policies necessary, relevant and deliverable?</i>• <i>Are the allocated sites deliverable?</i>• <i>Are the detailed requirements for each site clear and justified?</i>• <i>Are the allocations justified and effective? Have all of the site constraints/aspirations been taken into account?</i>
<p>It is assumed that the criteria of the allocations policies relate to the land use requirements, infrastructure requirements, design principles and delivery considerations.</p> <p>The criteria are necessary, relevant, clear and justified as per the response set out in paragraphs 10.1.1 -10.1.20, in addition to the explanation set out below.</p> <p>The open space is required to help address the borough's overall open space deficiency, as identified in the Open Space Strategy (SED39). The site allocation falls within the Weavers Field ward which is projected to have a high deficiency in open space by 2031.</p> <p>The community/local presence facility is required in order to address the existing deficit within the borough as outlined in the Infrastructure Delivery Plan (SD06). Policy S.CF1 of the LP directs such facilities towards town centres and part of the site falls within the Brick Lane district centre.</p> <p>The design principles set out are necessary and relevant in order to achieve good place making in a sustainable manner. Specifically, they seek to:</p> <ul style="list-style-type: none">• preserve and enhance heritage assets (for example, the grade II listed Braithwaite Viaduct and Oriel gate);• create high quality open spaces that satisfy the requirements of the Open Space Strategy through the provision of an open space located above the viaduct;• create green links as identified in the Green Grid Strategy; and• improve permeability of the site and connections to the surrounding area (for example, good connections to Brick Lane district centre). <p>On this basis, they are also considered to be justified.</p> <p>The constraints of the site are also embedded within the design principles, for example the requirement to protection/enhance the heritage assets that fall within the borough as well as those that fall within the London Borough of Hackney. An additional minor amendment will be made to the design principle within the site allocation to clarify which heritage assets within Hackney should be considered (PSMM144).</p> <p>The delivery considerations relating to the infrastructure being provided at the early stage of the development is considered to be necessary, relevant and justified in that it will be available to support the growing population within the area and address existing deficiencies. The wording is considered to be resilient enough to enable the delivery of infrastructure to respond to changing circumstances.</p> <p>With regards to deliverability, there is a live planning application on the site (ref PA/14/02011) which has been referred to the Mayor of London. If approved, the scheme is expected to come forward within the latter years of the plan period (i.e. after the first five years). If the application is refused, we will continue to work with the landowners in order to help ensure that an acceptable scheme is delivered.</p>

Evidence base	
<ul style="list-style-type: none"> • <i>Is the allocation justified by the evidence base?</i> 	
<p>In addition to the documents listed in our response to question 10.1, the following evidence base documents have informed the requirements/criteria to ensure that the site allocation is justified:</p> <ul style="list-style-type: none"> • City Fringe Opportunity Area Planning Framework (GLA, 2015) (SED2) • Central Activities Zone Supplementary Planning Guidance (GLA, 2016) (SED32) • Managing Development Document (2013) 	
Extent of the site	
<ul style="list-style-type: none"> • <i>Is the extent of each site correctly identified?</i> 	
<p>Yes, the council considers that the extent of the site has been correctly identified. It reflects the boundary that is identified in the adopted Managing Development Document (2013).</p> <p>It also reflects the planning application boundary (ref PA/14/02011) with the exception of a section within the north-east corner of the site which has been included due to its prominence at the junction of Sclater Street and Brick Lane.</p>	
Figures and layout	
<ul style="list-style-type: none"> • <i>What has informed the figures and layouts provided for each site allocation? To what degree do they accurately reflect any extant planning permission?</i> 	
<p>The location of the public square derives from a general good place making principles in that it provides a connection between major roads (i.e. Bethnal Green Road and Commercial Road) as well as good access to Shoreditch High Street station. The local and strategic routes are also informed by good place making and connectivity principles to help ensure that the site has sufficient levels of permeability.</p> <p>The Braithwaite viaduct has informed the layout due to its grade II listed status and its associated constraints.</p> <p>While the location of the community/local presence facility has not been shown on figure 23, the design principles require the facility to be located on key routes to ensure it is along the areas with high footfall and has good accessibility.</p> <p>The location of the open space has been carried forward from the adopted Managing Development Document, which requires it to provide a local park above the Braithwaite Viaduct. Given the heritage constraints the viaduct poses in terms of development, it is considered that the open space would be suited in this location. This would also free land on the ground for other uses.</p> <p>The green grid links have been taken from the Green Grid Strategy (SED42).</p> <p>The layout of the site allocation broadly reflects the live planning application, particularly in terms of the north-south public square and open space, as well as the pedestrian/cycling routes. As stated in the section above, the extent of the boundary is slightly different to the application.</p>	
Scale and mix	
<ul style="list-style-type: none"> • <i>Is the overall scale and mix of development proposed for each site justified?</i> 	
<p>The justification relating to the scale of the development is set out in paragraphs 10.1.31 – 10.1.32.</p> <p>The site allocation proposes a mix of uses as set out in the table below</p>	
Land use / infrastructure	Justification
Housing	To help meet the borough's housing target set out in the London Plan
Employment (a range of floorspace sizes, including small-	To help meet the borough's employment target set out in the London Plan. A range of floor spaces are required to accommodate the different needs of employment uses. This is in

to-medium enterprises)	accordance with part 3a of policy S.EMP 1 and part 4 of policy D.EMP2.
Strategic open space (minimum 1 hectare)	To help address the borough's open space deficiency as set out in the Open Space Strategy and the IDP. The size of the site is large enough to reasonably accommodate 1 hectare of consolidated open space as set out in the Site Allocations Methodology.
Community/local presence facility	To help address the borough's deficiency as set out in the IDP. The IDP directs such facilities towards town centres and part of the site falls within the Brick Lane district centre.
Leisure facility	To address the strategic objectives of the Indoor Sports Facilities Strategy as identified in the IDP. This location reflects the opportunities set out in the Indoor Sports Facilities Strategy (SED38)

Site allocation name: London Dock (site allocation 1.2)

Necessity, relevance and deliverability

- *Are the criteria in the allocations policies necessary, relevant and deliverable?*
- *Are the allocated sites deliverable?*
- *Are the detailed requirements for each site clear and justified?*
- *Are the allocations justified and effective? Have all of the site constraints/aspirations been taken into account?*

It is assumed that the criteria of the allocations policies relate to the land use requirements, infrastructure requirements, design principles and delivery considerations.

The criteria are necessary, relevant, clear and justified as per the response set out in paragraphs 10.1.1 -10.1.20, in addition to the explanation set out below.

The open space is required to help address the borough's overall open space deficiency. The site allocation forms part of St Katherine's and Wapping ward where a low deficiency of open space has been projected in 2031. The Open Space Strategy (SED39) identifies that there is a limited ability to create new space within development sites with the exception of a new pocket park within London Dock site. The small open space has been secured through planning obligations.

The requirement for a secondary school is embedded in the Infrastructure Delivery Plan SD06) and Spatial Assessment Need for Schools (2018)(SED72). The planning permission (PA/14/02819) at London Dock includes the delivery of a secondary school.

The Infrastructure Delivery Plan (SD06) identified London Dock site allocation for the delivery of a health facility to help meet the projected need.

The design principles set out are necessary and relevant in order to achieve good place making in a sustainable manner. Specifically, they seek to:

- preserve and enhance the surrounding development and heritage assets, for example the grade I and II listed warehouses on site and the adjacent grade I listed Tobacco Dock;
- create high quality open spaces that satisfy the requirements of the Open Space Strategy;
- Create green links, for example along Wapping Lane and Pennington Street as identified in the Green Grid Strategy; and
- improve permeability of the site and the surrounding area, for example improved access to Thomas More neighbourhood centre.

On this basis, design principles are considered to be justified.

Design principles also take into account the constraints of the site, such as grade I listed Tobacco Dock.

The delivery considerations relating to the safe access route(s) to the secondary school are considered necessary, relevant and justified in order to comply with the relevant standards.

With regards to deliverability, the site has planning permission and the development is under construction.

Evidence base

- *Is the allocation justified by the evidence base?*

In addition to the documents listed in our response to question 10.1, the following evidence base documents have informed the requirements/criteria to ensure that the site allocation is justified:

- City Fringe Opportunity Area Planning Framework (GLA, 2015) (SED2)
- Spatial Assessment Need for Schools 2016-2031 (2018)
- Managing Development Document (2013)

Extent of the site

- *Is the extent of each site correctly identified?*

Yes, it is considered that the extent of the site has been correctly identified. It reflects the boundary that is identified in the adopted Managing Development Document (2013) and the planning consent.

Figures and layout

- *What has informed the figures and layouts provided for each site allocation? To what degree do they accurately reflect any extant planning permission?*

The location of the public square seeks to deliver high quality open space that is integrated with the green grid route on the north-western part of the site allocation and along the canal. The local and strategic pedestrian routes are also informed by good place-making and connectivity principles to help ensure that the site has sufficient levels of permeability.

Strategic and local pedestrian/ cycling routes aim to provide a highly permeable site and improve permeability from the Highway to the site and further to the south.

The Green Grid Strategy informed the site allocation in terms of the existing green grid routes which were also embedded in the Managing Development Document.

The boundary shown on the site allocation figure follows the consented scheme.

Scale and mix

- *Is the overall scale and mix of development proposed for each site justified?*

The justification relating to the scale of the development is set out in paragraphs 10.1.31 – 10.1.32.

The site allocation proposed a mix of uses as set out in the table below.

Land use/infrastructure	Justification – evidence base
Housing	To help meet the borough's housing target set out in the London Plan.
Employment (a range of floorspace sizes, including SME's)	To help meet the borough's employment target set out in the London Plan. The site allocation falls within the City Fringe Activity Area. A range of floor spaces are required to accommodate the different needs of employment uses. This is in accordance with part 3a of policy S.EMP 1 and part 4 of policy D.EMP2.
Small open space (minimum of 0.4 hectares)	To help address the borough's open space deficiency as set out in the Open Space Strategy and the IDP.
Secondary school	To help address the borough's deficiency as set out in the IDP. The new community facility will be provided in a town centre location which accords with policies S.CF1 and D.CF3.
Health facility	To help address the borough's deficiency as set out in the IDP. The new community facility will be provided in a town centre location which accords with policies S.CF1 and D.CF3.

Site allocation name: Marian Place Gas Works and The Oval (1.3)

Necessity, relevance and deliverability

- *Are the criteria in the allocations policies necessary, relevant and deliverable?*
- *Are the allocated sites deliverable?*
- *Are the detailed requirements for each site clear and justified?*
- *Are the allocations justified and effective? Have all of the site constraints/aspirations been taken into account?*

It is assumed that the criteria of the allocations policies relate to the land use requirements, infrastructure requirements, design principles and delivery considerations.

The criteria are necessary, relevant, clear and justified as per the response set out in paragraphs 10.1.1 -10.1.20, in addition to the explanation set out below.

The open space is required to help address the borough's overall open space deficiency. The Open Space Strategy (SED39) identifies that the site falls within the St. Peter's ward which is expected to have a high deficiency in open space in terms of hectares per 1,000 people by 2031. The strategy also identifies that the site falls out of an area that is within a 5-minute walking distance (400 metres) to an open space of 1 hectare or above. It is noted that Victoria Park is within close proximity to the site (but does not fall within 400 metres walking distance), however in order to address the existing deficiency as well as the impact arising from future growth of the site and its surroundings, the requirement for open space is necessary and relevant.

The design principles set out are necessary and relevant in order to achieve good place making in a sustainable manner. Specifically, they seek to:

- preserve and enhance heritage assets on site such as the gasholders;
- create high quality open spaces that satisfy the requirements of the Open Space Strategy;
- protect the integrity of the Regents Canal and The Oval from excessive overshadowing; and
- improve the permeability of the site, particularly with regards to providing access routes to the canal

On this basis, they are also considered to be justified.

The constraints are also clearly identified, for example the requirement to protect/enhance heritage assets such as the gasholders (MM226).

The delivery considerations seeking the effective engagement between landowners and addressing land contamination and flood mitigation measures are considered to be relevant, necessary and justified.

Matters regarding deliverability are set out in paragraphs 10.1.8 and 10.1.21-10.1.25 and in the response to question 10.4.

Evidence base

- *Is the allocation justified by the evidence base?*

In addition to the documents listed in the council's response to question 10.1, the following evidence base documents have informed the requirements/criteria to ensure that the site allocation is justified:

- City Fringe Opportunity Area Planning Framework (GLA, 2015) (SED2)
- Conservation Strategy (2017) (SED11)
- Urban Structure and Characterisation Study (2009 and addendum 2016) (SED12)
- Managing Development Document (2013)

Extent of the site

- *Is the extent of each site correctly identified?*

Yes, it is considered that the extent of the site has been correctly identified. It has been extended in comparison to the adopted Managing Development Document (2013) to include a portion of land between Emma Street and Hackney Road.

A minor modification has been made to the size of the site to reflect the boundary change (MM232) since the adoption of the Managing Development Document.

Figures and layout

- *What has informed the figures and layouts provided for each site allocation? To what degree do they accurately reflect any extant planning permission?*

The design principles have largely been carried forward from the adopted Managing Development Document as our aspirations remain the same.

The design principle relating to the retention of the gasholders has been refined to specifically make reference to which gasholders and buildings we are seeking to retain (MM226). The site diagram (figure 25) has been amended show the current location of the gasholders (MM231) which supports the council's aspiration for their retention.

Scale and mix

- *Is the overall scale and mix of development proposed for each site justified?*

The justification relating to the scale of the development is set out in paragraphs 10.1.31 – 10.1.32.

The site allocation proposes a mix of uses as set out in the table below.

Land use/infrastructure	Justification – evidence base
Housing	To help meet the borough's housing target set out in the London Plan
Employment (a range of new floorspace sizes, including suitable units suitable for the needs of SMEs, start-ups and creative tech industries)	To help meet the borough's employment target set out in the London Plan.
Strategic open space (minimum 1 hectare)	To help address the borough's open space deficiency as set out in the Open Space Strategy and the IDP.

Site allocation name: Whitechapel South (site allocation 1.4)

Necessity, relevance and deliverability

- *Are the criteria in the allocations policies necessary, relevant and deliverable?*
- *Are the allocated sites deliverable?*
- *Are the detailed requirements for each site clear and justified?*
- *Are the allocations justified and effective? Have all of the site constraints/aspirations been taken into account?*

It is assumed that the criteria of the allocations policies relate to the land use requirements, infrastructure requirements, design principles and delivery considerations.

The criteria are necessary, relevant, clear and justified as per the response set out in paragraphs 10.1.1 -10.1.20, in addition to the explanation set out below.

At least 1 hectare of strategic open space in this location is required to help address the borough's overall open space deficiency. The site allocation forms part of the Whitechapel ward where a high deficiency of open space has been projected in 2031. The Open Space Strategy (SED39) identified that there is a limited ability to create new space within development sites. Due to the surrounding uses, the Whitechapel Vision Masterplan SPD (20130 (SED67) envisaged the delivery of an active green space for social interaction, events and spill out space for surrounding uses known as the Green Spine. Given the high deficiency in Whitechapel ward, the Open Space Strategy requires a minimum of 1 hectare of open space to be delivered through the site allocation.

The requirement for the replacement and provision of a new sexual health facility has been set out in the Infrastructure Delivery Plan (SD06). The re-provision of the health facility will enhance the provision of primary care in the borough.

The illustrated green links reflect the existing and proposed green grid route in the Green Grid Strategy.

The design principles set out are necessary and relevant in order to achieve good place making in a sustainable manner. Specifically, they seek to

- preserve and enhance the surrounding development and heritage assets,;
- create high quality open spaces that satisfy the requirements of the Open Space Strategy through the provision of the Green Spine;
- create green links as identified in the Green Grid Strategy; and
- improve permeability of the site , for example through the delivery of the Green Spine

On this basis, design principles are considered to be justified

Design principles also take into account the constraints of the site such as numerous listed buildings such as grade II listed former Royal London Hospital, terraces along Newark Street, Ashfield Street, and Mount Terrace, and London Hospital and Myrdle Street conservation areas.

The delivery considerations seek to ensure that the existing sexual health facility is re-provided as identified in the IDP. Given the multiple ownerships on the site, there was a need to ensure the delivery of a high quality linear open space which has a consistent design.

With regards to deliverability, the site has multiple landowners as well as multiple permissions:

- PA/04/00611 – redevelopment of the Whitechapel Hospital;
- PA/15/02959 – allowed appeal on the Whitechapel Estate for a mixed-use development;
- PA/15/01789 – residential scheme on the Safestore site; and
- PA/17/02825 and PA/17/02828 – full planning permission and listed buildings consent for a new Tower Hamlets Civic Centre.

Evidence base

- *Is the allocation justified by the evidence base?*

In addition to the documents listed in the council's response to question 10.1, the following evidence base documents have informed the requirements/criteria to ensure that the site allocation is justified:

- Whitechapel Masterplan Vision Supplementary Planning Document (2013) (SED67)
- City Fringe Opportunity Area Planning Framework (GLA, 2015)

Extent of the site

- *Is the extent of each site correctly identified?*

Yes, it is considered that the extent of the site has been correctly identified. It largely covers the area that is considered capable of delivering a comprehensive redevelopment of the site and enabling better permeability through the wider area.

Figures and layout

- *What has informed the figures and layouts provided for each site allocation? To what degree do they accurately reflect any extant planning permission?*

Public squares form part of the required strategic open space and aim to integrate with other parts of public spaces on the site such as the "Green Spine" and the green grid routes as envisaged in the Whitechapel Masterplan Vision SPD.

Strategic and local pedestrian/ cycling routes and green grid routes aim to improve permeability from Whitechapel Road and Station across the site to Commercial Road.

The Green Grid Strategy informed the site allocation in terms of the existing and proposed green grid routes that will stretch across the Green Spine which will serve as a shared space for various uses.

These various projects also reflect planning permissions secured on site:

- PA/04/00611 – redevelopment of the Whitechapel Hospital;
- PA/15/02959 – allowed appeal on the Whitechapel Estate for a mixed-use development;
- PA/15/01789 – residential scheme on the Safestore site; and
- PA/17/02825 and PA/17/02828 – full planning permission and listed buildings consent for a new Tower Hamlets Civic Centre.

Scale and mix

- *Is the overall scale and mix of development proposed for each site justified?*

The justification relating to the scale of the development is set out in paragraphs 10.1.31 – 10.1.32.

The site allocation proposes a mix of uses as set out in the table below.

Land use/infrastructure	Justification – evidence base
Housing	To help meet the borough's housing target set out in the London Plan.
Employment (suitable units for the needs of life science, medical and research uses)	To help meet the borough's employment target set out in the London Plan. The site allocation falls within the City Fringe Activity Area. The City Fringe Opportunity Area Planning Framework and the Whitechapel Masterplan Vision Supplementary Planning Document promote opportunities to create a globally competitive life-science campus.
Strategic open space (minimum of 1 hectare)	To help address the borough's open space deficiency as set out in the Open Space Strategy and the IDP.
Health centre	To help address the borough's deficiency as set out in the IDP. The new community facility will be located within a town centre in accordance with policies S.CF1 and D.CF3.
District heating facility	As identified in the Whitechapel Vision Masterplan SPD (SED67) and the London Heat Map Study (SED51)

Site allocation name: Bow Common Gas Works (2.1)

Necessity, relevance and deliverability

- *Are the criteria in the allocations policies necessary, relevant and deliverable?*
- *Are the allocated sites deliverable?*
- *Are the detailed requirements for each site clear and justified?*
- *Are the allocations justified and effective? Have all of the site constraints/aspirations been taken into account?*

It is assumed that the criteria of the allocations policies relate to the land use requirements, infrastructure requirements, design principles and delivery considerations.

The criteria are necessary, relevant, clear and justified as per the response set out in paragraphs 10.1.1 -10.1.20, in addition to the explanation set out below.

The open space is required to help address the borough's overall open space deficiency. The Open Space Strategy (SED39) identifies that the site falls within the Bromley South ward, which is expected to have a high deficiency in open space in terms of hectares per 1,000 people by 2031.

The approach to allocating secondary schools is set out in the Site Allocations Methodology (SED64) and in the Spatial Assessment Need for Schools (SED72). Also see response to the forth bullet point in relation to question 3.3.

The above information confirms that the infrastructure asks are necessary and relevant.

The design principles set out are necessary and relevant in order to achieve good place making in a sustainable manner. Specifically, they seek to:

- respond positively to the surrounding conservation areas and nature reserve;
- integrate the site with the green grid network along Knapp Road and Bow Common Lane;
- provide active frontages along the railway arches; and
- ensure that noise mitigation measures are implemented in areas bordering the railway line

On this basis, they are also considered to be justified.

The design principles also take into account the constraints of the site such as the setting of the conservation areas and nature reserve and the proximity to the railway line. The delivery considerations relating to air quality and flood mitigation measures are considered necessary, relevant and justified in order to comply with the relevant standards.

Matters regarding deliverability are set out in paragraphs 10.1.8 and 10.1.21-10.1.25 and in the response to question 10.4.

Evidence base

- *Is the allocation justified by the evidence base?*

In addition to the documents listed in the council's response to question 10.1, the following evidence base documents have informed the requirements/criteria to ensure that the site allocation is justified:

- Spatial Assessment Need for Schools (2018) (SED72)
- Managing Development Document (2013)

It has been noted that the viability assessment concludes that the site is unviable in the sense that it is unable to deliver a policy compliant level of affordable housing alongside the infrastructure asks, however the response to question 10.4 outlines how we seek to address this matter.

Extent of the site

- *Is the extent of each site correctly identified?*

Yes. It is considered that the extent of the site is correctly identified. The site boundary largely reflects the boundary set out in the adopted Managing Development Document.

Figures and layout

- *What has informed the figures and layouts provided for each site allocation? To what degree do they accurately reflect any extant planning permission?*

The layout has largely been carried forward from the adopted Managing Development Document as our aspirations remain the same. The most notable change is how open space is depicted.

Scale and mix

- *Is the overall scale and mix of development proposed for each site justified?*

The justification relating to the scale of the development is set out in paragraphs 10.1.31 – 10.1.32.

The site allocation proposes a mix of uses as set out in the table below

Land use/infrastructure	Justification – evidence base
Housing	To help meet the borough's housing target set out in the London Plan
Employment (a range of floorspaces which support SME's, creative industries and retail)	To help meet the borough's employment target set out in the London Plan. A range of floor spaces are required to accommodate the different needs of employment uses. This is in accordance with part 3a of policy S.EMP 1 and part 4 of policy D.EMP2.
Strategic open space (minimum 1 hectare)	To help address the borough's open space deficiency as set out in the Open Space Strategy and the IDP.
Secondary school	To help address the boroughs deficiency as set out in the IDP, Site Allocations Methodology and the Spatial Assessment Need for Schools.

Site allocation name: Crisp Street (2.2)

Necessity, relevance and deliverability

- *Are the criteria in the allocations policies necessary, relevant and deliverable?*
- *Are the allocated sites deliverable?*
- *Are the detailed requirements for each site clear and justified?*
- *Are the allocations justified and effective? Have all of the site constraints/aspirations been taken into account?*

It is assumed that the criteria of the allocations policies relate to the land use requirements, infrastructure requirements, design principles and delivery considerations.

The criteria are necessary, relevant, clear and justified as per the response set out in paragraphs 10.1.1 -10.1.20, in addition to the explanation set out below.

The requirement for retail uses are needed to ensure the integrity of Crisp Street district centre is retained.

The re-provision of the idea store is required to ensure that the existing deficiencies, as identified in the Infrastructure Delivery Plan (SD06) are not exacerbated. The protection of such facilities is also a requirement of policy D.CF2. The re-provision of the market is required in order to support the role and function of Crisp Street district centre and be in accordance with policy D.TC7.

The above information demonstrates that the criteria are necessary, relevant and justified.

The design principles set out are necessary and relevant in order to achieve good place making in a sustainable manner. Specifically, they seek to:

- ensure the delivery of a regenerated town centre for the Poplar area;
- protect the heritage assets on site and respond positively to the Landsbury Estate Conservation area and Poplar Baths;
- Improve connectivity, particularly to Langdon Park and All Saints DLR stations; and
- Improve visual connections to the clocktower

On this basis, they are also considered to be justified.

The design principles also take into account the constraints of the site, such as the clocktower and the setting of the conservation areas.

With regards to deliverability, there is a live planning application (PA/16/01612) which is shortly due to be determined at planning committee. The scheme has gone through rigorous viability testing and as a result proposes the maximum reasonable uplift in the affordable housing provision, re-provides the market and also retains the Idea Store. Provision has been made for existing shopkeepers and stall holders to return to the site following the regeneration proposals. The scheme also includes the introduction of a cinema which together with a number of A3 (restaurant) uses which will help stimulate the evening economy. This demonstrates that the applicant considers the scheme to be deliverable.

Evidence base

- *Is the allocation justified by the evidence base?*

In addition to the documents listed in our response to question 10.1, the following evidence base documents have informed the requirements/criteria to ensure that the site allocation is justified:

- Managing Development Document (2013)

Extent of the site

- *Is the extent of each site correctly identified?*

Yes, it is considered that the extent of the boundary has been correctly identified. The boundary of the site reflects the live planning application (PA/16/01612). There has been a representation (LP282/ID624910) made to include a site on Kerbey Street within the allocation on the grounds that there is an approved application (PA/16/02248) for the demolition of the garages and erection of a children's Sure Start centre. While this is the case, it is not considered necessary to amend the boundary to include the site, particularly as it does not impact on the comprehensive redevelopment of the site allocation. Moreover, the site on Kerbey Street is set in between blocks on a housing estate and would require more bespoke design principles to address the constraints.

Figures and layout

- *What has informed the figures and layouts provided for each site allocation? To what degree do they accurately reflect any extant planning permission?*

The layout has largely been carried forward from the adopted Managing Development Document as our aspirations remain the same. The most notable change that the plan now shows the location of the public square, which is an important feature of the site.

The live planning application (PA/16/01612) largely reflects the proposed layout, with the location of public open space/squares in similar locations to what is in the plan.

Scale and mix

- *Is the overall scale and mix of development proposed for each site justified?*

The justification relating to the scale of the development is set out in paragraphs 10.1.31 – 10.1.32.

The site allocation proposes a mix of uses as set out in the table below.

Land use/infrastructure	Justification – evidence base
Housing	To help meet the borough's housing target set out in the London Plan
Retail	To help meet the borough's employment target set out in the London Plan.
Idea store (re-provision)	To help address the borough's deficiency as set out in the IDP, and also to comply with the requirement of policy D.CF2. The IDP directs such facilities towards town centres and this site falls within the Chrisp Street district centre.
Market (re-provision)	To help support the role and function of the district centre and be in accordance with policy D.TC7.

Site allocation name: Ailsa Street (3.1)

Necessity, relevance and deliverability

- *Are the criteria in the allocations policies necessary, relevant and deliverable?*
- *Are the allocated sites deliverable?*
- *Are the detailed requirements for each site clear and justified?*
- *Are the allocations justified and effective? Have all of the site constraints/aspirations been taken into account?*

It is assumed that the criteria of the allocations policies relate to the land use requirements, infrastructure requirements, design principles and delivery considerations.

The criteria are necessary, relevant, clear and justified as per the response set out in paragraphs 10.1.1 -10.1.20, in addition to the explanation set out below.

The Site Allocations Methodology (SED64) and the Spatial Assessment Need for Schools (2018) (SED72) provides further information relating to the allocation of primary schools. Also see response to the fourth bullet point in relation to question 3.3.

The open space is required in order to help address the borough's overall open space deficiency. The Open Space Strategy (SED39) (see map 10 in appendix 2) identifies that the site is not within 5 minutes walking distance (400m) of an open space at least 1 hectare. While it is noted that the Leven Road Gas Works site allocation (3.2) requires the provision of strategic open space (minimum of 1 hectare) and is within 400m of the Ailsa Street site allocation, the small open space within this site allocation will help to ensure access to smaller open spaces and address the overall deficiency in the borough.

The retention of the waste site is necessary in order to assist the borough in securing land to contribute to the waste apportionment target set out in the London Plan. The loss of the waste site would mean that the council will not be able to demonstrate that it has land secured to ensure that there is sufficient capacity to meet the apportionment target as set out in the Waste Management Evidence Base (2017) (SED59). In addition, policy 5.17 of the London Plan requires waste sites to be safeguarded. The above information confirms that the infrastructure asks and the retention of the waste site are necessary, relevant and justified.

The design principles set out are necessary and relevant in order to achieve good place making in a sustainable manner. Specifically, they seek to:

- Safeguard the waste site
- Protect the heritage assets on site such as Poplar Public library and Bromley Hall
- Mitigate noise and air pollution impacts generated by the A12
- Improve connections, including along the River Lea to the Bromley-by-Bow district centre and the Aberfeldy neighbourhood centre
- provide the land to facilitate the delivery of a bridge over the River Lea

On this basis, they are also considered to be justified.

The design principles also take into account the constraints of the site, for example the land use requirements require the retention of the waste site and the design principles require the land to be provided for the delivery of a bridge.

With regards to deliverability, the site is within multiple landownership. There is a live planning application (PA/16/02692) which covers a portion of the site that is situated to the south of the waste site. The application has been approved at planning committee and is in the process of finalising the section 106 signed off. As such, it is considered that the part of the within the application boundary is deliverable. Some of the site to the south of Lochnagar Street (outside of the planning application boundary) is council-owned land that comprises a vacant primary school that is grade II listed and adjoining land. Council departments will be working together, including asset management, to bring the site forward for development or conversion in accordance with planning policy.

Evidence base

- *Is the allocation justified by the evidence base?*

In addition to the documents listed in the council's response to question 10.1, the following evidence base documents have informed the requirements/criteria to ensure that the site allocation is justified:

- Waste Management Evidence Base (2017) (SED59)
- Spatial Assessment Need for Schools (2018) (SED72)
- Managing Development Document (2013)

Extent of the site

- *Is the extent of each site correctly identified?*

Yes, it is considered that the extent of the site has been correctly identified. It remains the same as the allocation in the adopted Managing Development Document (2013).

Figures and layout

- *What has informed the figures and layouts provided for each site allocation? To what degree do they accurately reflect any extant planning permission?*

The safeguarded waste site (see schedule 1 in policy S.MW1) has informed a large portion of the layout in respect of the northern part of the site. The location of the open space adjacent to the River Thames will create a better integration between the borough's open and water spaces and will promote a safer and more enjoyable public access to the River Thames.

The location of the public square adjacent to the proposed bridge has been informed by good place making principles in terms of creating an arrival/departure point to and from the site. The green grid links have been taken from the Green Grid Strategy (SED42).

The layout of the central part of the site is generally in line with the approved application particularly in terms of key routes and the location of open spaces.

Scale and mix

- *Is the overall scale and mix of development proposed for each site justified?*

The justification relating to the scale of the development is set out in paragraphs 10.1.31 – 10.1.32.

The site allocation proposes a mix of uses as set out in the table below

Land use/infrastructure	Justification – evidence base
Housing	To help meet the borough's housing target set out in the London Plan
Employment (a range of floorspaces which support SME's, creative industries and retail)	To help meet the borough's employment target set out in the London Plan. A range of floor spaces are required to accommodate the different needs of employment uses. This is in accordance with part 3a of policy S.EMP 1 and part 4 of policy D.EMP2.
Retention of safeguarded waste site	To ensure compliance with policy 5.17 of the London Plan The Waste Management Evidence Base concludes that the site is required in order to demonstrate that the borough has the capacity/land to meet the London Plan's apportionment target.
Small open space	To help address the borough's open space deficiency as set out in the Open Space Strategy and the IDP.
Primary school	To help address the borough's future deficiency as set out in the IDP, Site Allocations Methodology and Spatial Assessment Need for Schools.

Site allocation name: Leven Road Gas Works (3.2)

Necessity, relevance and deliverability

- *Are the criteria in the allocations policies necessary, relevant and deliverable?*
- *Are the allocated sites deliverable?*
- *Are the detailed requirements for each site clear and justified?*
- *Are the allocations justified and effective? Have all of the site constraints/aspirations been taken into account?*

It is assumed that the criteria of the allocations policies relate to the land use requirements, infrastructure requirements, design principles and delivery considerations.

The criteria are necessary, relevant, clear and justified as per the response set out in paragraphs 10.1.1 -10.1.20, in addition to the explanation set out below.

The approach to allocating secondary schools is set out in the Site Allocations Methodology and in the Spatial Assessment Need for Schools. Also, see response to the forth bullet point in relation to question 3.3.

The open space is required in order to help address the borough's overall open space deficiency. The Open Space Strategy identifies that the site falls within the Lansbury ward which is expected to have a moderate deficiency in open space in terms of hectares per 1,000 people by 2031.

The above information confirms that the infrastructure asks and land use requirements are necessary and relevant.

The design principles set out are necessary and relevant in order to achieve good place making in a sustainable manner. Specifically, they seek to:

- retain part of the gasholder and reflect the sites industrial heritage through measures such as public art;
- locate the open space adjacent to the River Lea, in order to maximise the amenity benefits;
- improve connections, including along the River Lea to the Bromley-by-Bow district centre and the Aberfeldy neighbourhood centre; and
- provide the land to facilitate the delivery of a bridge over the River Lea.

On this basis, they are also considered to be justified.

The design principles also take into account constraints of the site (for example, the requirement to retain parts of the gasholder and provide land for safeguarding the bridge).

Matters regarding deliverability are set out in the response to question 10.4.

Following various pre-application and Statement of Common Ground meetings, it has been agreed that a secondary school can be delivered on a variety of plot sizes and can come forward on a site less than 1.5 hectare as calculated in the Local Plan Viability Assessment (SED5) and Site Allocations Methodology (SED72). As such, we are applying a degree of flexibility with regards to the size of the school to help ensure that a viable scheme that delivers the site allocation requirements is able to come forward within the plan period.

Evidence base

- *Is the allocation justified by the evidence base?*

In addition to the documents listed in the council's response to question 10.1, the following evidence base documents have informed the requirements//criteria to ensure that the site allocation is justified:

- Spatial Assessment Need for Schools (2018) (SED72)
- Managing Development Document (2013)

It has been noted that the viability assessment concludes that the site is unviable in the

sense that it is unable to deliver a policy compliant level of affordable housing alongside the infrastructure asks; however, the section above outlines how we seek to address this matter.

Extent of the site

- *Is the extent of each site correctly identified?*

Yes, it is considered that the extent of the site has been correctly identified. It remains the same as the allocation in the adopted Managing Development Document.

Figures and layout

- *What has informed the figures and layouts provided for each site allocation? To what degree do they accurately reflect any extant planning permission?*

The layout has been informed by a number of good place making principles. The north-south pedestrian/cycling route will provide access to the riverside and maximise connectivity to the potential bridge. The east-west route will connect the riverside to the residential area to the east.

There is an approved residential scheme in the western part of the site (PA/13/03053) which has almost completed the construction phase. However, the figure does not show any details relating to the part of the site.

Scale and mix

- *Is the overall scale and mix of development proposed for each site justified?*

The justification relating to the scale of the development is set out in paragraphs 10.1.31 – 10.1.32.

The site allocation proposes a mix of uses as set out in the table below

Land use/infrastructure	Justification – evidence base
Housing	To help meet the borough’s housing target set out in the London Plan
Employment (new employment floorspace through a range of floor space sizes which support SMEs)	To help meet the borough’s employment target set out in the London Plan. A range of floor spaces are required to accommodate the different needs of employment uses. This is in accordance with part 3a of policy S.EMP 1 and part 4 of policy D.EMP2.
Strategic open space	To help address the borough’s open space deficiency as set out in the Open Space Strategy and the IDP.
Secondary school	To help address the borough’s future deficiency as set out in the IDP, Site Allocations Methodology and Spatial assessment Need for Schools.

Site allocation name: Aspen Way (4.1)

Necessity, relevance and deliverability

- *Are the criteria in the allocations policies necessary, relevant and deliverable?*
- *Are the allocated sites deliverable?*
- *Are the detailed requirements for each site clear and justified?*
- *Are the allocations justified and effective? Have all of the site constraints/aspirations been taken into account?*

It is assumed that the criteria of the allocations policies relate to the land use requirements, infrastructure requirements, design principles and delivery considerations.

The criteria are necessary, relevant, clear and justified as per the response set out in paragraphs 10.1.1 -10.1.20, in addition to the explanation set out below.

The college (New City College) and the East End Community Foundation community centre will need to be re-provided in accordance with policies S.CF1 and D.CF. The IDP also identifies that the Isle of Dogs has the most acute need to deliver a community facility - hence the importance of its re-provision. The response to the regulation 19 consultation has also confirmed that there is the intention to continue to provide education on the existing site.

The open space is required in order to help address the borough's overall open space deficiency. The Open Space Strategy identifies that the site falls within the Canary Wharf ward, which is expected to have a high deficiency in open space in terms of hectares per 1,000 people by 2031.

The above information demonstrates that the criteria are necessary, relevant and justified.

The design principles set out are necessary and relevant in order to achieve good place making in a sustainable manner. Specifically, they seek to:

- respond positively to the St. Mathias conservation area and protect or enhance the grade II listed college building;
- improve connections across Aspen Way;
- improve connections to Poplar High Street and the nearby DLR stations; and
- ensure appropriate mitigation measures are implemented to address the environmental impacts caused by Aspen Way

On this basis, they are also considered to be justified.

The design principles and delivery considerations also take into account constraints of the site, for example the requirement to respond positively to the existing character as well as the conservation area (MM271). Transport for London - who own the part of the site that is currently used as the DLR depot - have confirmed that the operations of the depot will need to be retained throughout the re-development of the site and this constraint has been included in the delivery considerations.

With regards to deliverability, the site is in multiple landownership. In order to help ensure that the site can comprehensively be redeveloped, additional wording has been included in the introductory section to the site allocation to encourage landowners to work together with other key partners (MM215).

A significant constraint relating to the site is the poor connection to Canary Wharf and the rest of the Isle of Dogs due to the severance arising from Aspen Way (A102). While the delivery considerations require improved connectivity across Aspen Way, we will work with landowners and other relevant parties to facilitate the delivery of adequate connections across Aspen Way. Based on the above, it is considered that the site is deliverable.

Evidence base	
<ul style="list-style-type: none"> • <i>Is the allocation justified by the evidence base?</i> 	
<p>In addition to the documents listed in the our response to question 10.1, the following evidence base documents have informed the requirements/criteria to ensure that the site allocation is justified:</p> <ul style="list-style-type: none"> • Conservation Strategy (2017) (SED11) • Urban Structure and Characterisation Study (2009) and addendum (2016) (SED12) 	
Extent of the site	
<ul style="list-style-type: none"> • <i>Is the extent of each site correctly identified?</i> 	
<p>Yes. It is considered that the extent of the site has been correctly identified. The allocation is not in the adopted Managing Development Document (2013) and the regulation 18 version of the LP did not include the New City College site or the East End Community Foundation Community Centre.</p> <p>The inclusion of the college and community centre is considered necessary in order to facilitate better connections and integration between South Poplar and Canary Wharf. New City College support our approach to include the college site in response to the regulation 19 consultation and have confirmed that they wish to continue to provide education uses on the site.</p>	
Figures and layout	
<ul style="list-style-type: none"> • <i>What has informed the figures and layouts provided for each site allocation? To what degree do they accurately reflect any extant planning permission?</i> 	
<p>The connections though the site and across to Canary Wharf have informed the layout of the site. The location of the open space is for illustrative purposes and will be agreed through the development management process.</p>	
Scale and mix	
<ul style="list-style-type: none"> • <i>Is the overall scale and mix of development proposed for each site justified?</i> 	
<p>The justification relating to the scale of the development is set out in paragraphs 10.1.31 – 10.1.32.</p> <p>The site allocation proposes a mix of uses as set out in the table below</p>	
Land use/infrastructure	Justification – evidence base
Housing	To help meet the borough’s housing target set out in the London Plan
Employment (a range of floorspace sizes, including small-to-medium enterprises)	To help meet the borough’s employment target set out in the London Plan. A range of floor spaces are required to accommodate the different needs of employment uses. This is in accordance with part 3a of policy S.EMP 1 and part 4 of policy D.EMP2.
Strategic open space	To help address the borough’s open space deficiency as set out in the Open Space Strategy and the IDP.
College (re-provision)	To ensure no net loss of community facilities in accordance with policy S.CF1 and D.CF2.
Community facility (re-provision)	To ensure no net loss of community facilities in accordance with policies S.CF1 and D.CF2 and help address the borough’s deficiency as set out in the IDP.

Site allocation name: Billingsgate Market (4.2)

Necessity, relevance and deliverability

- *Are the criteria in the allocations policies necessary, relevant and deliverable?*
- *Are the allocated sites deliverable?*
- *Are the detailed requirements for each site clear and justified?*
- *Are the allocations justified and effective? Have all of the site constraints/aspirations been taken into account?*

It is assumed that the criteria of the allocations policies relate to the land use requirements, infrastructure requirements, design principles and delivery considerations.

The criteria are necessary, relevant, clear and justified as per the response set out in paragraphs 10.1.1 -10.1.20, in addition to the explanation set out below.

The approach to allocating secondary schools is set out in the Site Allocations Methodology (SED64) and in the Spatial Assessment Need for Schools (SED72). Also see response to the forth bullet point in relation to question 3.3.

The site falls within a secondary Preferred Office Location (POL), which states that development should seek to provide a minimum provision of 75% employment and CAZ strategic uses as set out in policy S.EMP1.

The open space is required in order to help address the borough's overall open space deficiency. The Open Space Strategy (SED39) (see map 10 in appendix 2) identifies that the site is not within 5 minutes walking distance (400m) of an open space at least 1 hectare.

The above information demonstrates that the criteria are necessary, relevant and justified.

The design principles set out are necessary and relevant in order to achieve good place making in a sustainable manner. Specifically, they seek to:

- Enhance connections to neighbouring site allocations
- Protect or enhance the statutory listed accumulator tower
- Improve connections across Aspen Way
- Protect the integrity of West India Dock by ensuring development is stepped back

On this basis, they are also considered to be justified.

The design principles and delivery also take into account the constraints of the site such as heritage assets, the need to improve connections across Aspen Way and the need to ensure that the market is appropriately re-provided.

With regards to deliverability, the viability assessment has concluded that the site is viable. The site is owned by the Corporation of London and the council, and there are on-going discussions regarding its redevelopment. Given the public ownership of the site along with the wider aspirations of the council and the Local Plan, it is considered that this site is deliverable within the plan period.

Evidence base

- *Is the allocation justified by the evidence base?*

In addition to the documents listed in the council's response to question 10.1, the following evidence base documents have informed the requirements//criteria to ensure that the site allocation is justified:

- Spatial Assessment Need for Schools (2018) (SED72)
- Managing Development Document (2013)

Extent of the site

- *Is the extent of each site correctly identified?*

Yes, it is considered that the extent of the boundary has been correctly identified. The boundary has largely been carried forward from the adopted Managing Development Document as our aspirations remain the same.

Figures and layout

- *What has informed the figures and layouts provided for each site allocation? To what degree do they accurately reflect any extant planning permission?*

The site allocation is based on the layout set out in the adopted Managing Development Document with regards to the strategic route that runs along the southern boundary and the connections across Aspen Way. The open spaces are illustrative and the exact location will be agreed through the development management process.

Scale and mix

- *Is the overall scale and mix of development proposed for each site justified?*

The justification relating to the scale of the development is set out in paragraphs 10.1.31 – 10.1.32.

The site allocation proposes a mix of uses as set out in the table below.

Land use/infrastructure	Justification – evidence base
Housing	To help meet the borough’s housing target set out in the London Plan
Employment (POL with ancillary supporting uses)	To help meet the borough’s employment target set out in the London Plan and the requirements of policy S.EMP1.
Small open space	To help address the borough’s open space deficiency as set out in the Open Space Strategy and the IDP.
Secondary school	To help address the borough’s future deficiency as set out in the IDP, Site Allocations Methodology and Spatial Assessment Need for Schools.

Site allocation name: Crossharbour Town Centre (4.3)

Necessity, relevance and deliverability

- *Are the criteria in the allocations policies necessary, relevant and deliverable?*
- *Are the allocated sites deliverable?*
- *Are the detailed requirements for each site clear and justified?*
- *Are the allocations justified and effective? Have all of the site constraints/aspirations been taken into account?*

It is assumed that the criteria of the allocations policies relate to the land use requirements, infrastructure requirements, design principles and delivery considerations.

The criteria are necessary, relevant, clear and justified as per the response set out in paragraphs 10.1.1 -10.1.20, in addition to the explanation set out below.

The requirement for the redevelopment of the district centre is to ensure that its function, vitality and viability are maintained in accordance with policy S.EMP.1.

The requirement for a primary school is set out in the Infrastructure Delivery Plan (SD06). The Site Allocations Methodology (SED64) and the Spatial Assessment Need for Schools (SED72) provide further information relating to the allocation of primary schools. Also see response to the forth bullet point in relation to question 3.3.

The community/local presence facility is required in order to address the existing deficit within the borough as outlined in the Infrastructure Delivery Plan. Policy S.CF1 directs such facilities towards town centres and part of the site falls within the Crossharbour district centre.

The re-provision and expansion of the health facility is necessary in order to address the deficit identified in the IDP from 2020/2021 onwards. The site is situated within the Isle of Dogs and South Poplar sub-area which is expected to experience the greatest population increase and therefore the retention and expansion of the existing health facility is vital in meeting the needs often existing and future communities.

The above information demonstrates that the criteria are necessary, relevant and justified.

The design principles set out are necessary and relevant in order to achieve good place making in a sustainable manner. Specifically, they seek to:

- create a new town centre in accordance with policy S.EMP1;
- respond positively to the surrounding area, including Mudchute Park which adjoins the southern boundary of the site;
- protect heritage assets such as the setting of the Maritime Greenwich world heritage site; and
- improve connections to Crossharbour DLR Station and Mudchute Park.

On this basis, they are also considered to be justified.

The design principles also take into account constraints of the site, for example the requirement to respond well to Mudchute Park (which is designated as Metropolitan Open Land, a Local Nature Reserve and a Site of Importance for Nature Conservation) as well as ensuring heritage assets are protected or enhanced. The delivery considerations also recognise the constraints such as ensuring a new supermarket should be provided before the existing one is redeveloped to ensure continued service to local residents.

With regards to deliverability, the viability assessment concludes that the site is viable. A planning application (PA/11/03670) was granted permission in November 2014 comprising a mixed use scheme which includes up to approximately 30,000 square metres of floorspace (use class A1-A4, B1, D1-D2) and up to 850 residential units. The application has lapsed. The Council is currently engaged in detailed pre-application discussions for an alternative scheme and we will continue to work with those with an interest in the land to help ensure that a comprehensive scheme can be brought forward within the plan period.

Evidence base	
<ul style="list-style-type: none"> • <i>Is the allocation justified by the evidence base?</i> 	
<p>In addition to the documents listed in our response to question 10.1, the following evidence base documents have informed the requirements/criteria to ensure that the site allocation is justified:</p> <ul style="list-style-type: none"> • Spatial Assessment Need for Schools (2018) (SED72) • Managing Development Document (2013). 	
Extent of the site	
<ul style="list-style-type: none"> • <i>Is the extent of each site correctly identified?</i> 	
<p>Yes, it is considered that the extent of the boundary has been correctly identified. The boundary has largely been carried forward from the adopted Managing Development Document, although amendments have been made to include the existing community facility along the northern boundary so that its role and function can be maximised with other services within the site.</p>	
Figures and layout	
<ul style="list-style-type: none"> • <i>What has informed the figures and layouts provided for each site allocation? To what degree do they accurately reflect any extant planning permission?</i> 	
<p>The layout of the site been informed by the green grid route which runs diagonally across the site. The location of the square is broadly in line with the adopted Managing Development Document. The location of the open space along the eastern edge is indicative, but could provide for north/south connections along East Ferry Road that is set back from the main road.</p>	
Scale and mix	
<ul style="list-style-type: none"> • <i>Is the overall scale and mix of development proposed for each site justified?</i> 	
<p>The justification relating to the scale of the development is set out in paragraphs 10.1.31 – 10.1.32.</p> <p>The site allocation proposes a mix of uses as set out in the table below.</p>	
Land use/infrastructure	Justification – evidence base
Housing	To help meet the borough’s housing target set out in the London Plan
District centre (re-provision) (retail and other compatible uses)	To help meet the borough’s employment target set out in the London Plan and to protect the vitality and viability of the district centre.
Community/local presence facility	To help address the borough’s deficiency as set out in the IDP. The IDP directs such facilities towards town centres and this site falls within the Crossharbour district centre.
Health facility	To ensure no net loss of health facilities in accordance with policy S.CF1 and D.CF2 and help address the borough’s deficiency as set out in the IDP.

Site allocation name: Limeharbour (4.4)

Necessity, relevance and deliverability

- *Are the criteria in the allocations policies necessary, relevant and deliverable?*
- *Are the allocated sites deliverable?*
- *Are the detailed requirements for each site clear and justified?*
- *Are the allocations justified and effective? Have all of the site constraints/aspirations been taken into account?*

It is assumed that the criteria of the allocations policies relate to the land use requirements, infrastructure requirements, design principles and delivery considerations.

The criteria are necessary, relevant, clear and justified as per the response set out in paragraphs 10.1.1 -10.1.20, in addition to the explanation set out below.

The requirement for a primary school is set out in the Infrastructure Delivery Plan (SD06). The Site Allocations Methodology (SED64) and the Spatial Assessment Need for Schools (SED72) provide further information relating to the allocation of primary schools. Also see response to the fourth bullet point in relation to question 3.3.

The open space is required in order to help address the borough's overall open space deficiency. The Open Space Strategy (SED39) identifies that the site falls within the Blackwall and Cubitt Town ward which is expected to have a high deficiency in open space in terms of hectares per 1,000 people by 2031.

The above information demonstrates that the criteria are necessary, relevant and justified.

The design principles set out are necessary and relevant in order to achieve good place making in a sustainable manner. Specifically they seek to:

- Ensure that development is of an appropriate scale in relation to the tall buildings in Canary Wharf as well as the lower rise buildings of Cubitt Town
- Protect or enhance the heritage assets such as the historic docks and the setting of the Maritime Greenwich world heritage site
- Protect the integrity of the dockside by ensuring development is stepped back
- Improve connections to places such as Mudchute park

On this basis, they are also considered to be justified.

The design principles also take into account the constraints of the site such as the protection of the historic docks and the setting of the Maritime Greenwich world heritage site to be enhanced or protected in accordance with the Views and Landmarks evidence base (2018) (SED15) and the London View Management Framework(2012) (SED14) and policy D.DH4.

With regards to deliverability, there is a live planning application (PA/17/01597) for a mixed use development covering the portion of the site that sits to the east of the allocation. The proposal comprises 579 residential units, a 2FE primary school with nursery facilities, an SME business centre and flexible commercial floorspace. The proposal also includes landscaped open space.

Evidence base	
<ul style="list-style-type: none"> • <i>Is the allocation justified by the evidence base?</i> 	
<p>In addition to the documents listed in our response to question 10.1, the following evidence base documents have informed the requirements/criteria to ensure that the site allocation is justified:</p> <ul style="list-style-type: none"> • Views and Landmarks evidence base (2018) (SED15) • Spatial Assessment Need for Schools (2018) (SED72) • Managing Development Document (2013) 	
Extent of the site	
<ul style="list-style-type: none"> • <i>Is the extent of each site correctly identified?</i> 	
<p>Yes, it is considered that the extent of the boundary has been correctly identified. The site is to some extent based on the layout of the larger site allocation in the adopted Managing Development Document (2013), known as Marsh Wall East.</p> <p>This site allocation is effectively the southern portion of the adopted Marsh Wall East site allocation, with the exception of the western boundary which no longer extends into Millwall Inner Dock. This is because the waterspace represents a valuable resource and any further loss of waterspace in this location would run counter to the principles of sustainable development set out in the Water Spaces Study (2017) (SED43). Any application for development on waterspaces should be dealt with in a bespoke manner in accordance with the relevant policies.</p> <p>Since the regulation 18 version of the Local Plan, the boundary within the north-east corner of the site has been extended to include a private car park. This is to enable the opportunity for comprehensive redevelopment whereby the car park would facilitate improved permeability and access to the site.</p>	
Figures and layout	
<ul style="list-style-type: none"> • <i>What has informed the figures and layouts provided for each site allocation? To what degree do they accurately reflect any extant planning permission?</i> 	
<p>The layout has been informed by good place making principles such as ensuring there is adequate access to the waterfront with a waterfront walk. The waterfront could be opened up further so that open space can be located adjacent to it, as per the Green Grid Strategy (SED42).</p>	
Scale and mix	
<ul style="list-style-type: none"> • <i>Is the overall scale and mix of development proposed for each site justified?</i> 	
<p>The justification relating to the scale of the development is set out in paragraphs 10.1.31 – 10.1.32.</p> <p>The site allocation proposes a mix of uses as set out in the table below</p>	
Land use/infrastructure	Justification – evidence base
Housing	To help meet the borough’s housing target set out in the London Plan
Employment (a range of floorspace sizes, including SME’s)	To help meet the borough’s employment target set out in the London Plan. A range of floor spaces are required to accommodate the different needs of employment uses. This is in accordance with part 3a of policy S.EMP 1 and part 4 of policy D.EMP2.
Strategic open space	To help address the borough’s open space deficiency as set out in the Open Space Strategy and the IDP.
Primary school	To help address the borough’s future deficiency as set out in the IDP, Site Allocations Methodology and Spatial assessment Need for Schools.

Site Allocation Name: Marsh Wall East (4.5)

Necessity, relevance and deliverability

- *Are the criteria in the allocations policies necessary, relevant and deliverable?*
- *Are the allocated sites deliverable?*
- *Are the detailed requirements for each site clear and justified?*
- *Are the allocations justified and effective? Have all of the site constraints/aspirations been taken into account?*

It is assumed that the criteria of the allocations policies relate to the land use requirements, infrastructure requirements, design principles and delivery considerations.

The criteria are necessary, relevant, clear and justified as per the response set out in paragraphs 10.1.1 -10.1.20, in addition to the explanation set out below.

The requirement for a primary school is set out in the IDP (SD06). The Site Allocations Methodology and the Spatial Assessment Need for Schools provide further information relating to the allocation of primary schools. Also see response to the forth bullet point in relation to question 3.3.

The open space is required in order to help address the boroughs overall open space deficiency. The Open Space Strategy (SED39)(see map 10 in appendix 2) identifies that the site is not within 5 minutes walking distance (400m) of an open space at least 1 hectare. While it is noted that the Limeharbour site allocation (4.4) which sits less than 400 metres to the south of the site, requires the provision of strategic open space (minimum of 1 hectare),, the small open space on this site allocation will help to ensure access to smaller open spaces and address the overall deficiency in the borough.

The health facility is necessary in order to address the deficit identified in the IDP (SD06) from 2020/2021 onwards. The site is situated within the Isle of Dogs and South Poplar sub-area which is expected to experience the greatest population increase and therefore the retention and expansion of the existing health facility is vital in meeting the needs often existing and future communities.

The above information demonstrates that the infrastructure asks are necessary, relevant and justified.

The design principles set out are necessary and relevant in order to achieve good place making in a sustainable manner. Specifically, they seek to:

- Ensure that development provides appropriate building heights that protect the character of the dockside and lower rise buildings
- Protect or enhance the historic docks and the setting of the Maritime Greenwich world heritage site
- Improve walking and cycling connections to places such as Canary Wharf Major Centre and Mudchute Park
- Provide open spaces along the waterfront areas of particularly along South Dock

On this basis, they are also considered to be justified.

The design principles also take into account the constraints of the site for example the protection of heritage assets including the historic docks and the setting of the Maritime Greenwich world heritage site to be enhanced or protected in accordance with the Views and Landmarks evidence base (2018) (SED15) and the London View Management Framework(2012) (SED14) and policy D.DH4.

With regards to deliverability, the site is in multiple landownership and a number of plots have active uses. An application for the redevelopment of 225 Marsh Wall (PA/16/02808) was refused on the grounds of scale and massing and is currently going through the appeal process. The scheme proposed to deliver 332 residential units, a community space and a small portion of flexible retail. However, adjacent to the site, at Meridian gate, a mixed use

scheme comprising inter-alia 423 residential units in 53 storey tower has been approved under PA/14/01428 and is currently under construction. The very eastern part of the site allocation is council-owned and includes an existing council-run building (Jack Dash House). Council departments will work closely to ensure that the site is redeveloped in accordance with the requirements of the site allocation within the plan period.

The viability assessment (SED5) tested part of the site known as the Thames Quay site and concluded that the site is viable. We will continue to work with landowners to bring the site forward within the plan period.

Evidence base

- *Is the allocation justified by the evidence base?*

In addition to the documents listed in our response to question 10.1, the following evidence base documents have informed the requirements//criteria to ensure that the site allocation is justified:

- Spatial Assessment Need for Schools (2018) (SED72)
- South Quay Masterplan Supplementary Planning Document (2015) (SED68)
- Managing Development Document (2013)

Extent of the site

- *Is the extent of each site correctly identified?*

Yes, it is considered that the extent of the boundary to be correctly identified. The excluded areas along the northern boundary have existing residential uses which are unlikely to be redeveloped within the plan period.

Figures and layout

- *What has informed the figures and layouts provided for each site allocation? To what degree do they accurately reflect any extant planning permission?*

The layout of the site has been informed by the Green Grid Strategy (SED42) and good place making principles to ensure the site has good levels of permeability and connectivity between Marsh Wall and South Dock. The indicative location of the open spaces are adjacent to dock to create activate the dockside and open up the space around the dock.

Scale and mix

- *Is the overall scale and mix of development proposed for each site justified?*

The justification relating to the scale of the development is set out in paragraphs 10.1.31 – 10.1.32.

The site allocation proposes a mix of uses as set out in the table below

Land use/infrastructure	Justification – evidence base
Housing	To help meet the borough’s housing target set out in the London Plan
Employment (a range of floorspace sizes, including SME’s)	To help meet the borough’s employment target set out in the London Plan. A range of floor spaces are required to accommodate the different needs of employment uses. This is in accordance with part 3a of policy S.EMP 1 and part 4 of policy D.EMP2.
Small open space	To help address the borough’s open space deficiency as set out in the Open Space Strategy and the IDP.
Primary school	To help address the borough’s future deficiency as set out in the IDP, Site Allocations Methodology and Spatial assessment Need for Schools.
Health facility	To help address the borough’s deficiency as set out in the IDP.

Site allocation name: Marsh Wall West (site allocation 4.6)

Necessity, relevance and deliverability

- *Are the criteria in the allocations policies necessary, relevant and deliverable?*
- *Are the allocated sites deliverable?*
- *Are the detailed requirements for each site clear and justified?*
- *Are the allocations justified and effective? Have all of the site constraints/aspirations been taken into account?*

It is assumed that the criteria of the allocations policies relate to the land use requirements, infrastructure requirements, design principles and delivery considerations.

The criteria are necessary, relevant, clear and justified as per the response set out in paragraphs 10.1.1 -10.1.20, in addition to the explanation set out below.

The site allocation forms part of Canary Wharf Ward where a high deficiency of open space has been projected in 2031. Whilst the Open Space Strategy (SED39) does not specifically identify a small open space for the Marsh Wall West site allocation, given the expected high density development on site and in the area, the inclusion of a need for open space was considered necessary and deliverable. Furthermore, the delivery of a new open space will help address the borough's overall open space deficiency.

The requirement for a primary school is embedded in the IDP, Site Allocations Methodology (SED64) and the Spatial Assessment Need for Schools (SED72). The delivery of a school has been secured through planning permission where the school will be delivered within the building envelope along with other uses. Also see response to the forth bullet point in relation to question 3.3.

The IDP has identified a need for the new primary health facility to be delivered as part of the Marsh Wall West site allocation.

The design principles set out are necessary and relevant in order to achieve good place making in a sustainable manner. Whilst there are no heritage assets on or adjacent to the site, development on site should respect the surrounding area, the setting of the historic docks and the setting of the Maritime Greenwich world heritage site. Design principles seek to:

- Ensure that development provides appropriate building heights that protect the character of the surrounding area, such as the lower rise buildings
- Protect or enhance the historic docks and the setting of the Maritime Greenwich world heritage site
- create green links as identified in the Green Grid Strategy, for example along Marsh Wall; and
- improve permeability of the site and the surrounding area as widely promoted in the London Plan and various policies in the LP.

On this basis, design principles are considered to be justified.

Design principles also take into account the constraints of the site such as the lower rise development to the south-west and potential adverse environmental impacts.

As part of the delivery considerations, we seek to encourage developers and landowners to approach the redevelopment of the site allocation in a more collaborative manner to deliver a comprehensive and sustainable development.

The delivery considerations provide sufficient flexibility for the delivery of a health centre, secured through a permission at 50 Marsh Wall or an alternative community facility. Given the proximity to the Barkantine energy centre, it is possible that development can help expand the local network as identified in the IDP.

In terms of deliverability, a number of sites have already secured permission and at least two are currently under construction which are Arrow Head Quay (PA/12/03315) a mixed used

scheme providing 756 residential units in two towers of 55 and 50 storeys and South Quay Plaza 1 and 2 delivering a mixed used scheme of 888 residential units in two towers of 36 and 68 storeys.

Evidence base

- *Is the allocation justified by the evidence base?*

In addition to the documents listed in our response to question 10.1, the following evidence base documents have informed the requirements/criteria to ensure that the site allocation is justified:

- South Quay Masterplan Supplementary Planning Document (2015)(SED68)
- Spatial Assessment Need for Schools 2016-2031 (2018)(SED72)
- Managing Development Document (2013).

Extent of the site

- *Is the extent of each site correctly identified?*

The boundary of the site allocation should be amended in order to reflect the approved South Quay development more accurately (planning application PA/14/00944). As currently identified, phase 4 of the South Quay development was included in the Marsh Wall West site allocation, whilst the remaining South Quay phases 1-3 which are immediately adjacent to the boundary have not been included.

Figures and layout

- *What has informed the figures and layouts provided for each site allocation? To what degree do they accurately reflect any extant planning permission?*

Open spaces and public squares located adjacent to the water and waterfront walk will enhance people’s enjoyment of the docks and improve accessibility to water spaces. Other open spaces not adjoining the dockside seek to provide amenity spaces in a dense urban environment.

Strategic and local pedestrian/ cycling routes and green grid routes aim to improve permeability across the site and to the surrounding area including Millwall area to the south-east, Canary Wharf to the north across the existing and proposed bridge, and to the River Thames on the west.

The Green Grid Strategy (SED42) informed the site allocation in terms of the green grid routes.

The Wardian development (reference PA/12/03315) is situated along the dockside and the open spaces shown on the site allocation diagram reflect the development.

Alpha Square redevelopment (reference PA/15/02671) partially falls within the site allocation boundary. The open spaces shown on the site allocation diagram do not reflect the redevelopment accurately, however, the site allocations are illustrative.

The adjoining South Quay Plaza development under reference PA/14/00944 is immediately adjacent to the site allocation boundary and includes phases 1-3. South Quay Plaza Phase 4 was granted under reference PA/15/03073 by the GLA and is included in the site allocation boundary. The Marsh Wall West site allocation boundary will be amended to include the full extent of the South Quay Plaza development.

Scale and mix

- *Is the overall scale and mix of development proposed for each site justified?*

The justification relating to the scale of the development is set out in paragraphs 10.1.31 – 10.1.32.

The site allocation proposed a mix of uses as set out in the table below.

Land use/infrastructure	Justification – evidence base
Housing	To help meet the borough’s housing target set out in the London Plan.
Employment (a range of floorspace)	To help meet the borough’s employment target set out in the London Plan.

sizes, including SMEs)	A range of floor spaces are required to accommodate the different needs of employment uses. This is in accordance with part 3.a of policy S.EMP1 and part 4 of policy D.EMP2.
Small open space (minimum of 0.4 hectares)	To help address the borough's open space deficiency as set out in the Open Space Strategy and the IDP.
Primary school	To help address the borough's deficiency and accommodate the expected development and population growth as set out in the IDP and Spatial Assessment Need for Schools.
Health facility	To help address the borough's deficiency and accommodate the expected development and population growth as set out in the IDP. The site falls within the Tower Hamlets Activity Area and the South Quay neighbourhood centre, and a new community facility will be located within a town centre in accordance with policy D.CF3.

Site allocation name: Millharbour South (4.7)

Necessity, relevance and deliverability

- *Are the criteria in the allocations policies necessary, relevant and deliverable?*
- *Are the allocated sites deliverable?*
- *Are the detailed requirements for each site clear and justified?*
- *Are the allocations justified and effective? Have all of the site constraints/aspirations been taken into account?*

It is assumed that the criteria of the allocations policies relate to the land use requirements, infrastructure requirements, design principles and delivery considerations.

The criteria are necessary, relevant, clear and justified as per the response set out in paragraphs 10.1.1 -10.1.20, in addition to the explanation set out below.

The requirement for a primary school is set out in the Infrastructure Delivery Plan. The Site Allocations Methodology and the Spatial Assessment Need for Schools provide further information relating to the allocation of primary schools. Also see response to the forth bullet point in relation to question 3.3.

The open space is required in order to help address the borough's overall open space deficiency. The Open Space Strategy (SED39) (see map 10 in appendix 2) identifies that the site is not within 5 minutes walking distance (400 metres) of an open space at least 1 hectare. While it is noted notes that the Westferry site allocation (4.12) requires the provision of strategic open space (minimum of 1 hectare) and it is in less than 400 metres distance, the small open space on this site allocation will help to ensure access to smaller open spaces and address the overall deficiency in the borough.

The health centre is necessary in order to address the deficit identified in the IDP (SD06) from 2020/2021 onwards. The site is situated within the Isle of Dogs and South Poplar sub-area which is expected to experience the greatest population increase and therefore the retention and expansion often existing health facility is vital in meeting the needs often existing and future communities.

The above information demonstrates that the criteria are necessary, relevant and justified.

The design principles set out are necessary and relevant in order to achieve good place making in a sustainable manner. Specifically, they seek to:

- ensure that development provides appropriate building heights that protect the character of the dockside and lower rise buildings to the south of Millwall Dock;
- protect or enhance the historic docks and the setting of the Maritime Greenwich world heritage site;
- protect the integrity of the waterside by ensuring development is stepped back from the waterside; and
- locate the open space adjacent to Millwall Outer Dock to maximise the amenity benefits.

On this basis, they are also considered to be justified.

The design principles also take into account the constraints of the site, for example the requirement to protect or enhance the heritage assets including the historic docks and the setting of the Maritime Greenwich world heritage site to be enhanced or protected in accordance with the Views and Landmarks Topic Paper (2018) (SED15) and the London View Management Framework(2012) (SED14) and policy D.DH4.

Matters regarding deliverability are set out in our response to question 10.7

Evidence base

- *Is the allocation justified by the evidence base?*

In addition to the documents listed in our response to question 10.1, the following evidence base documents have informed the requirements/criteria to ensure that the site allocation is justified:

- Spatial Assessment Need for Schools (2018) (SED72)
- Managing Development Document (2013)

Extent of the site

- *Is the extent of each site correctly identified?*

Yes, it is considered that the extent of the site has been correctly identified. The boundary extends as far north as possible end ends where a new residential development has been built. It no longer includes the building that sits within Millwall Inner Dock because it is a waterspace and there are waterspace policies that seek to protect existing water spaces.

Figures and layout

- *What has informed the figures and layouts provided for each site allocation? To what degree do they accurately reflect any extant planning permission?*

The indicative location of the open space adjacent to the proposed open space within the Westferry site allocation (4.11) is to enable the delivery of a larger open space that also opens up the waterfront. The public square adjacent to the Glengall Bridge could serve as an arrival point to the western side of the dock as well as an opportunity to open up the waterfront along the dockside.

Scale and mix

- *Is the overall scale and mix of development proposed for each site justified?*

The justification relating to the scale of the development is set out in paragraphs 10.1.31 – 10.1.32.

The site allocation proposes a mix of uses as set out in the table below

Land use/infrastructure	Justification – evidence base
Housing	To help meet the borough’s housing target set out in the London Plan
Employment (a range of floorspace sizes, including SME’s)	To help meet the borough’s employment target set out in the London Plan. A range of floor spaces are required to accommodate the different needs of employment uses. This is in accordance with part 3a of policy S.EMP 1 and part 4 of policy D.EMP2.
Small open space	To help address the borough’s open space deficiency as set out in the Open Space Strategy and the IDP.
Primary school	To help address the borough’s future deficiency as set out in the IDP, Site Allocations Methodology and Spatial assessment Need for Schools.
Health facility	To help address the borough’s deficiency as set out in the IDP.

Site allocation name: Millharbour (4.8)

Necessity, relevance and deliverability

- *Are the criteria in the allocations policies necessary, relevant and deliverable?*
- *Are the allocated sites deliverable?*
- *Are the detailed requirements for each site clear and justified?*
- *Are the allocations justified and effective? Have all of the site constraints/aspirations been taken into account?*

It is assumed that the criteria of the allocations policies relate to the land use requirements, infrastructure requirements, design principles and delivery considerations.

The criteria are necessary, relevant, clear and justified as per the response set out in paragraphs 10.1.1 -10.1.20, in addition to the explanation set out below.

The requirement for a primary school is set out in the IDP (SD06). The Site Allocations Methodology (SED64) and the Spatial Assessment Need for Schools (SED72) provide further information relating to the allocation of primary schools. Also see response to the forth bullet point in relation to question 3.3.

The open space is required in order to help address the borough's overall open space deficiency. The Open Space Strategy (SED39) (see map 10 in appendix 2) identifies that the site is not within 5 minutes walking distance (400 metres) of an open space at least 1 hectare. While it is noted that the Westferry site allocation (4.12) requires the provision of strategic open space (minimum of 1 hectare), the small open space on this site allocation will help to ensure access to smaller open spaces and address the overall deficiency in the borough.

The health facility is required to address the deficit identified in the IDP (SD06) from 2020/2021 onwards. The site is situated within the Isle of Dogs and South Poplar sub-area which is expected to experience the greatest population increase and therefore the retention and expansion of an existing health facility is vital in meeting the needs of existing and future communities.

The above information demonstrates that the criteria are necessary, relevant and justified.

The design principles set out are necessary and relevant in order to achieve good place making in a sustainable manner. Specifically, they seek to:

- ensure that development provides appropriate building heights that protect the character of the dockside and lower rise buildings to the south of Millwall Dock;
- protect or enhance the historic docks and the setting of the Maritime Greenwich world heritage site;
- protect and integrate the waterside by ensuring development is stepped back from the waterside; and
- improve connections between places, such as Marsh Wall and South Quay

On this basis, they are also considered to be justified.

The design principles also take into account the constraints of the site, for example the third bullet point requires the heritage assets including the historic dockside promenade to be enhanced or protected in accordance with the Views and Landmarks evidence base (2018) (SED15) and the London View Management Framework(2012) (SED14) and policy D.DH4. .

With regards to deliverability, there are two planning applications relating to this site.

1. PA/14/03195 - 3 Millharbour and 6, 7 and 8 South Quay: a mixed use development comprising 1,513 residential units, a primary school, further education uses, flexible commercial floorspace and two public parks.
2. PA/14/01246 - 2 Millharbour: a mixed use development with comprising 901 residential units, ground floor mixed uses (B1/A1-A4 and D1), a 'leisure box (use class D2) and new

public amenity spaces.

2 Millharbour is well under construction and we are in discussions with the developer regarding the delivery of the school within number 3.

3 Millharbour is expected to commence works within the statutory three years.

With regards to the remaining western portion of the site, we will work with the landowners to help ensure that the site is brought forward to deliver the aspirations of the site allocation within the plan period.

Evidence base

- *Is the allocation justified by the evidence base?*

In addition to the documents listed in our response to question 10.1, the following evidence base documents have informed the requirements/criteria to ensure that the site allocation is justified:

- Spatial Assessment Need for Schools (2018) (SED72)
- Managing Development Document (2013)

Extent of the site

- *Is the extent of each site correctly identified?*

Yes, it is considered that the boundary of the site allocation is correctly identified as it is generally in line with the two approved planning application boundaries and also includes a site to the west that is situated between residential developments to the north and south, so is appropriate for re-development.

Figures and layout

- *What has informed the figures and layouts provided for each site allocation? To what degree do they accurately reflect any extant planning permission?*

The approved planning applications have informed the layouts of the site. The locations of the open spaces are broadly in line with what has been approved. The Green Grid Strategy has also informed the layout.

Scale and mix

- *Is the overall scale and mix of development proposed for each site justified?*

The justification relating to the scale of the development is set out in paragraphs 10.1.31 – 10.1.32.

The site allocation proposes a mix of uses as set out in the table below

Land use/infrastructure	Justification – evidence base
Housing	To help meet the borough’s housing target set out in the London Plan
Employment (a range of floorspace sizes, including SME’s)	To help meet the borough’s employment target set out in the London Plan. A range of floor spaces are required to accommodate the different needs of employment uses. This is in accordance with part 3a of policy S.EMP 1 and part 4 of policy D.EMP2.
Small open space	To help address the borough’s open space deficiency as set out in the Open Space Strategy and the IDP.
Primary school	To help address the borough’s future deficiency as set out in the IDP, Site Allocations Methodology and Spatial assessment Need for Schools.
Health facility	To help address the borough’s deficiency as set out in the IDP.

Site allocation name: North Quay (4.9)**Necessity, relevance and deliverability**

- *Are the criteria in the allocations policies necessary, relevant and deliverable?*
- *Are the allocated sites deliverable?*
- *Are the detailed requirements for each site clear and justified?*
- *Are the allocations justified and effective? Have all of the site constraints/aspirations been taken into account?*

It is assumed that the criteria of the allocations policies relate to the land use requirements, infrastructure requirements, design principles and delivery considerations.

The criteria are necessary, relevant, clear and justified as per the response set out in paragraphs 10.1.1 -10.1.20, in addition to the explanation set out below.

The predominant employment land use as well as the subservient housing land use are required in order to help meet the borough's housing and employment targets as set out in the London Plan.

The open space is required in order to help address the boroughs overall open space deficiency. The Open Space Strategy (SED39) (see map 10 in appendix 2) identifies that the site is not within 5 minutes walking distance (400 metres) of an open space at least 1 hectare. While it is noted that the Aspen Way site allocation (4.1) requires the provision of strategic open space (minimum of 1 hectare), the small open space on this site allocation will help to ensure access to smaller open spaces and address the overall deficiency in the borough.

The above information demonstrates that the criteria are necessary, relevant and justified.

The design principles set out are necessary and relevant in order to achieve good place making in a sustainable manner. Specifically, they seek to:

- improve links to the surrounding areas such as Canary Wharf and Poplar High Street;
- protect the integrity of the waterside by ensuring development is stepped back from it
- provide active frontages and access; and
- incorporate noise mitigation measures for areas along Aspen Way.

On this basis, they are also considered to be justified.

The design principles also take into account the constraints of the site, for example the requirement to provide active frontages and access along the dockside.

With regards to deliverability, the site has planning permission to accommodate 372,660 square metres of office floorspace, 5,324 square metres of A1-A5, public realm and a pedestrian bridge across West India Dock North (PA/03/00379) and the ground works have commenced. The viability assessment concludes that the site is viable.

It is noted that the permission does not propose any housing but the site allocation does, however no objections were received with regards to the principle of introducing residential uses on the site in the regulation 19 representation.

Evidence base

- *Is the allocation justified by the evidence base?*

See response to question 10.1.

Extent of the site

- *Is the extent of each site correctly identified?*

The boundary of the site will be amended (MJM33) in order to respond to representations received from the landowner (LP545) and to represent a closer reflection to the planning application boundary.

Figures and layout

- *What has informed the figures and layouts provided for each site allocation? To what degree do they accurately reflect any extant planning permission?*

The layout has partially been informed by the approved scheme in the sense that the proposed public square is located adjacent to the river. While the approved scheme does not incorporate a public square running south of the bridge. The proposed layout is an aspiration for the site in the event that any modifications are made.

Scale and mix

- *Is the overall scale and mix of development proposed for each site justified?*

The justification relating to the scale of the development is set out in paragraphs 10.1.31 – 10.1.32.

The site allocation proposes a mix of uses as set out in the table below

Land use/infrastructure	Justification – evidence base
Housing	To help meet the borough’s housing target set out in the London Plan
Employment (POL with ancillary supporting uses)	To help meet the borough’s employment target set out in the London Plan.
Small open space	To help address the borough’s open space deficiency as set out in the Open Space Strategy and the IDP.

Site allocation name: Reuters (4.10)

Necessity, relevance and deliverability

- *Are the criteria in the allocations policies necessary, relevant and deliverable?*
- *Are the allocated sites deliverable?*
- *Are the detailed requirements for each site clear and justified?*
- *Are the allocations justified and effective? Have all of the site constraints/aspirations been taken into account?*

It is assumed that the criteria of the allocations policies relate to the land use requirements, infrastructure requirements, design principles and delivery considerations.

The criteria are necessary, relevant, clear and justified as per the response set out in paragraphs 10.1.1 -10.1.20, in addition to the explanation set out below.

The requirement for a primary school is set out in the IDP (SD06). The Site Allocations Methodology (SED64) and the Spatial Assessment Need for Schools (SED72) provide further information relating to the allocation of primary schools. Also see response to the forth bullet point in relation to question 3.3.

The open space is required in order to help address the borough's overall open space deficiency. The Open Space Strategy (SED39) (see map 10 in appendix 2) identifies that the majority of the site is not within 5 minutes walking distance (400 metres) of an open space at least 1 hectare. While it is noted that the proposed open space will not provide 1 hectare, it will help to ensure access to smaller open spaces and address the overall deficiency in the borough.

The above information demonstrates that the criteria are necessary, relevant and justified.

The design principles set out are necessary and relevant in order to achieve good place making in a sustainable manner. Specifically, they seek to:

- retain, reuse or enhance the existing heritage assets such as the grade II listed dock;
- provide mitigation measures to address noise and air pollution along Aspen Way or Blackwall;
- ensure the provision of a pedestrian and cycle link along the Thames Path; and
- integrate the existing waterspace on site with the future open space in order to maximise its amenity provision

On this basis, they are also considered to be justified.

The constraints are also clearly identified, for example the second bullet point requires development to retain, reuse or enhance the grade II listed dock and the grade II listed ventilation shaft.

With regards to deliverability, the viability assessment concludes that the site is viable and we will work with developers to bring the site forward.

Evidence base

- *Is the allocation justified by the evidence base?*

In addition to the documents listed in our response to question 10.1, the following evidence base documents have informed the requirements/criteria to ensure that the site allocation is justified:

- Spatial Assessment Need for Schools (2018) (SED72)

Extent of the site

- *Is the extent of each site correctly identified?*

Yes, it is considered that the extent of the boundary has been correctly identified. A modification has been made (MM302) to the boundary of the site to exclude the pier/jetty as it no longer exists. Whilst future development is likely to be delivered on a plot by plot basis (as stated in the landowners representation - LP940/ID1143450), this will not alter the boundary of the site. The ways in which the site comes forward and the detailed design with regards to how satisfactorily the proposed application take into account the future development of the remaining site will be addressed through the development management process.

Figures and layout

- *What has informed the figures and layouts provided for each site allocation? To what degree do they accurately reflect any extant planning permission?*

The location of the open space next to the enhanced waterspace is to maximise the amenity provision within the site. The location of the public square, as stated in the design principles, is to create an arrival point. The public square will open up the site and potentially provide a route to the enhanced waterspace and open space which will be adjacent to the River Thames. This layout will help to create a sense of openness and ensure that the historic assets are protected.

Scale and mix

- *Is the overall scale and mix of development proposed for each site justified?*

The justification relating to the scale of the development is set out in paragraphs 10.1.31 – 10.1.32.

The site allocation proposes a mix of uses as set out in the table below

Land use/infrastructure	Justification – evidence base
Housing	To help meet the borough’s housing target set out in the London Plan
Employment (re-provision of existing employment by way of intensifying job numbers)	To help meet the borough’s employment target set out in the London Plan.
Small open space	To help address the borough’s open space deficiency as set out in the Open Space Strategy and the IDP.
Primary school	To help address the borough’s future deficiency as set out in the IDP, Site Allocations Methodology and Spatial assessment Need for Schools.

Site allocation name: Riverside South (4.11)**Necessity, relevance and deliverability**

- *Are the criteria in the allocations policies necessary, relevant and deliverable?*
- *Are the allocated sites deliverable?*
- *Are the detailed requirements for each site clear and justified?*
- *Are the allocations justified and effective? Have all of the site constraints/aspirations been taken into account?*

It is assumed that the criteria of the allocations policies relate to the land use requirements, infrastructure requirements, design principles and delivery considerations.

The criteria are necessary, relevant, clear and justified as per the response set out in paragraphs 10.1.1 -10.1.20, in addition to the explanation set out below.

The predominant employment land use as well as the subservient housing land use are required in order to help to meet the borough's housing and employment targets as set out in the London Plan.

The open space is required in order to help address the boroughs overall open space deficiency. The Open Space Strategy (SED39)(see map 10 in appendix 2) identifies that the site is not within 5 minutes walking distance (400 metres) of an open space at least 1 hectare. While it is noted that the proposed small open space will not provide 1 hectare, it will help to ensure access to smaller open spaces and address the overall deficiency in the borough.

The above information demonstrates that the criteria are necessary, relevant and justified.

The design principles set out are necessary and relevant in order to achieve good place making in a sustainable manner. Specifically, they seek to:

- ensure development is stepped back from the riverside and ensure that there is a publicly accessible route along the waterfront;
- improve walking and cycling connections, particularly connections to Westferry Circus, Westferry Road and the River Thames;
- provide a green open space along the River Thames; and
- create a visual connection from Bank Street/Westferry Road to the Thames riverside

On this basis, they are also considered to be justified.

The design principles also take into account the constraints of the site, for example provide public access along the waterfront.

With regards to deliverability, the site has planning permission for an B1 office development comprising two towers with parking, access road, public open space and riverside walking (PA/08/02249/A2) The ground works have technically commenced.

It is noted that the permission does not propose any housing but the site allocation does, however no objections were received with regards to the principle of introducing residential uses on the site in the regulation 19 representation.

Evidence base

- *Is the allocation justified by the evidence base?*

See response to question 10.1.

Extent of the site

- *Is the extent of each site correctly identified?*

Yes, it is considered that the extent of the boundary has been correctly identified, as it represents the undeveloped land in that location. It also falls within the planning application boundary.

Figures and layout

- *What has informed the figures and layouts provided for each site allocation? To what degree do they accurately reflect any extant planning permission?*

The location of the open space next to the enhanced waterspace is to maximise the amenity provision the site. The location of the public square, as stated in the design principles is to create an arrival point. The public square will provide a strong visual connection from Bank Street/Westferry Road to the Thames Riverside.

Scale and mix

- *Is the overall scale and mix of development proposed for each site justified?*

The justification relating to the scale of the development is set out in paragraphs 10.1.31 – 10.1.32.

The site allocation proposes a mix of uses as set out in the table below

Land use/infrastructure	Justification – evidence base
Housing	To help meet the borough’s housing target set out in the London Plan
Employment (POL with ancillary supporting uses)	To help meet the borough’s employment target set out in the London Plan.
Small open space	To help address the borough’s open space deficiency as set out in the Open Space Strategy and the IDP.

Site allocation name: Westferry Printworks (site allocation 4.12)**Necessity, relevance and deliverability**

- *Are the criteria in the allocations policies necessary, relevant and deliverable?*
- *Are the allocated sites deliverable?*
- *Are the detailed requirements for each site clear and justified?*
- *Are the allocations justified and effective? Have all of the site constraints/aspirations been taken into account?*

It is assumed that the criteria of the allocations policies relate to the land use requirements, infrastructure requirements, design principles and delivery considerations.

The criteria are necessary, relevant, clear and justified as per the response set out in paragraphs 10.1.1 -10.1.20, in addition to the explanation set out below.

The site allocation forms part of Canary Wharf Ward where a high deficiency of open space has been projected in 2031. At least 1 hectare of strategic open space is required to help address the borough's overall open space deficiency. The strategic open space on the site has already been secured through a section 106 agreement as part of the planning permission PA/15/02216.

The approach to allocating secondary schools is set out in the Site Allocations Methodology (SED64) and in the Spatial Assessment Need for Schools (SED72). Also see response to the forth bullet point in relation to question 3.3.

The IDP (SD06) and the Indoor Sports Facilities Strategy (2017) (SED38) identified the retention and expansion of the existing Tiller Road leisure centre. The following minor modification is proposed to the infrastructure requirements to ensure that the needs identified in the IDP are embedded in the site allocation requirements:

- Leisure centre (re-provision and expansion)

The design principles set out are necessary and relevant in order to achieve good place making in a sustainable manner. Whilst there are no heritage assets on or adjacent to the site, development on site should respect the surrounding area, the setting of the Maritime Greenwich world heritage site. Specifically, these principles seek to:

- protect or enhance heritage assets such as the Maritime Greenwich world heritage site;
- create high quality open spaces that satisfy the requirements of the Open Space Strategy and located them adjacent to Millwall Outer Dock;
- create green links as identified in the Green Grid Strategy; and
- improve walking and cycling connections, for example to Millwall Outer Dock.

On this basis, design principles are considered to be justified.

Design principles also take into account the constraints of the site such as smaller scale developments to the north and south, and the waterside setting.

The delivery considerations require new development to be well connected with the leisure centre to ensure accessibility and maximise connectivity across the site and to the north.

Evidence base

- *Is the allocation justified by the evidence base?*

In addition to the documents listed in our response to question 10.1, the following evidence base documents have informed the requirements/criteria to ensure that the site allocation is justified:

- Spatial Assessment Need for Schools (2018) (SED72).

Extent of the site

- *Is the extent of each site correctly identified?*

Yes, it is considered that the extent of the site has been correctly identified. It largely covers the area that is considered capable of delivering a comprehensive redevelopment of the site and enabling better permeability through the wider area.

Figures and layout

- *What has informed the figures and layouts provided for each site allocation? To what degree do they accurately reflect any extant planning permission?*

Open spaces located adjacent to the water and waterfront walk will enhance people’s enjoyment of the docks. Other open spaces and public squares seek to provide amenity spaces and active spaces along the boundary of the site allocation.

Strategic and local pedestrian/cycling routes and green grid routes aim to improve permeability across the site and to the surrounding area including Westferry Road and the River Thames to the west and Millharbour to the east. The waterfront walk aims to provide accessibility to the water space and the Docklands Sailing centre to the south-west corner of the site allocation.

The Green Grid Strategy (SED42) informed the site allocation in terms of the green grid routes.

Planning permission under reference PA/15/02216 for a mixed-use redevelopment on Westferry Printworks site allocation has been implemented. Public squares, open spaces and pedestrian/ cycling routes reflect the approved planning permission. The boundary of the planning application does not include the existing Tiller Road leisure centre. However, we consider that the leisure centre should be included in the boundary of the site allocation given its potential expansion and refurbishment.

Scale and mix

- *Is the overall scale and mix of development proposed for each site justified?*

The justification relating to the scale of the development is set out in paragraphs 10.1.31 – 10.1.32.

The site allocation proposed a mix of uses as set out in the table below.

Land use/infrastructure	Justification – evidence base
Housing	To help meet the borough’s housing target set out in the London Plan.
Employment (re-provision of existing employment by way of intensifying employment job numbers)	To help meet the borough’s employment target set out in the London Plan. The re-provision of existing employment is required to ensure there is no net loss of existing employment in accordance with policy D.EMP3. The intensification of employment job numbers is compliant in line with policies S.EMP1 and D.EMP2.
Strategic open space (minimum of 1 hectare)	To help address the borough’s open space deficiency as set out in the Open Space Strategy and the IDP. The size of the site is large enough to reasonably accommodate at least 1 hectare of consolidated open space as set out in the Site Allocations Methodology.
Leisure centre (re-provision)	To help address the borough’s deficiency as set out in the IDP, and also to comply with policy D.CF2 and address the strategic objectives of the Indoor Sports Facilities Strategy as identified in the IDP.
Secondary school	To help address the borough’s deficiency as set out in the IDP, Site Allocations Methodology and the Spatial assessment Need for Schools. The new community facility will be provided in a location where it meets local need which accords with policies S.CF1 and D.CF3.

Site allocation name: Wood Wharf (site allocation 4.13)

Necessity, relevance and deliverability

- *Are the criteria in the allocations policies necessary, relevant and deliverable?*
- *Are the allocated sites deliverable?*
- *Are the detailed requirements for each site clear and justified?*
- *Are the allocations justified and effective? Have all of the site constraints/aspirations been taken into account?*

It is assumed that the criteria of the allocations policies relate to the land use requirements, infrastructure requirements, design principles and delivery considerations.

The criteria are necessary, relevant, clear and justified as per the response set out in paragraphs 10.1.1 -10.1.20, in addition to the explanation set out below.

The site allocation forms part of Canary Wharf ward where a high deficiency of open space has been projected in 2031. At least 1 hectare of strategic open space is required to help address the borough's overall open space deficiency. The strategic open space on the site has already been secured through planning permission PA/13/02966.

The requirement for a primary school is embedded in the IDP (SD06), Site Allocations Methodology (SED64) and the Spatial Assessment Need for Schools (SED72). Also see response to the forth bullet point in relation to question 3.3. The delivery of a school has been secured through planning permission.

Planning permission on Wood Wharf has also secured the delivery of an Idea Store which will replace the existing one on the Canary Wharf site. This will help to meet the borough's projected deficiency in community infrastructure. The delivery consideration relating to the Idea Store is proposed to be amended to ensure that the site allocation reflects the identified needs in the IDP (PSMM187).

The Infrastructure Delivery Plan has identified a need for the new primary health facility to be delivered as part of the Wood Wharf site allocation.

The design principles set out are necessary and relevant in order to achieve good place making in a sustainable manner. The Site Allocations Heritage Assessment provided specific recommendations that informed the site allocation. Specifically, these principles seek to:

- preserve and enhance the surrounding development and heritage assets such as the dock wall;
- create high quality open spaces that satisfy the requirements of the Open Space Strategy and Water Space Study;
- create green links as identified in the Green Grid Strategy along Prestons Road; and
- improve permeability of the site and the surrounding area as widely promoted in the London Plan and various policies in the LP.

On this basis, design principles are considered to be justified.

Design principles also take into account the constraints of the site such as grade I listed Blackwall Basin and Quay walls, Coldharbour conservation area and non-designated quay walls along the northern edge of South Dock.

The delivery considerations take into consideration development of the Crossharbour town centre to ensure that the idea store satisfies the needs of communities in the most appropriate manner.

Evidence base

- *Is the allocation justified by the evidence base?*

In addition to the documents listed in our response to question 10.1, the following evidence base documents have informed the requirements/criteria to ensure that the site allocation is justified:

- Spatial Assessment Need for Schools (2018) (SED72)

Extent of the site

- *Is the extent of each site correctly identified?*

The boundary of the site allocation should be amended in order to reflect the approved development which is currently under construction. The changes relate to the south-western boundary which includes the oversailing of the development into the water, western part of the boundary to provide access to the bridge, residential terrace to the north-eastern corner of the site, small infill in the Blackwall Basin, and extension to the north-western corner of the site stretching to the roundabout.

Figures and layout

- *What has informed the figures and layouts provided for each site allocation? To what degree do they accurately reflect any extant planning permission?*

Public squares and open spaces seek to provide appropriate amenity and circulation spaces within a dense urban environment.

Strategic and local pedestrian/cycling and green grid routes aim to provide a highly permeable site and improve connectivity to the surrounding area. The waterfront walk will enhance people's enjoyment of the docks and improve accessibility to water spaces.

The Green Grid Strategy (SED42) informed the site allocation in terms of the green grid routes.

Outline planning permission (PA/13/02966) for a mixed-use redevelopment of the Wood Wharf site is now under construction. We are proposing changes to the site allocation diagram to reflect the boundary of the planning application and to include the location of bridges.

Scale and mix

- *Is the overall scale and mix of development proposed for each site justified?*

The justification relating to the scale of the development is set out in paragraphs 10.1.31 – 10.1.32.

The site allocation proposed a mix of uses as set out in the table below.

Land use/infrastructure	Justification – evidence base
Housing	To help meet the borough's housing target set out in the London Plan.
Employment (town uses including SMEs and large floorplate offices)	To help meet the borough's employment target set out in the London Plan. The site falls within the Secondary Preferred Office Location and the Canary Wharf Major Centre. A range of town uses including small-to-medium enterprises and large floorplate offices are required to promote town centre's vitality and accommodate the different needs of employment uses in line with policies S.EMP1, D.EMP2, S.TC1 and D.TC2.
Strategic open space (minimum of 1 hectare)	To help address the borough's open space deficiency as set out in the Open Space Strategy and the IDP. The size of the site is large enough to reasonably accommodate at least 1 hectare of consolidated open space as set out in the Site Allocations Methodology.
Primary school	To help address the borough's deficiency as set out in the IDP, Site Allocations Methodology and the Spatial Assessment Need for Schools. The new community facility will be located within a town centre in accordance with policies S.CF1 and D.CF3.
Idea store	To help address the borough's deficiency as set out in the IDP, and also to comply policy D.CF2. The IDP and policies S.CF1 and D.CF3 seek to direct such facilities towards town centres as these are the most accessible areas in the

	borough.
Health facility	To help address the borough's deficiency as set out in the IDP. The new community facility will be located within a town centre in accordance with policies S.CF1 and D.CF3.