



**London Borough of Tower Hamlets**

# Site Allocations Methodology

**Tower Hamlets Local Plan: 2016-2031**

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# 1. Introduction

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## Overview

- 1.1 The London Borough of Tower Hamlets ("the council") is preparing a new Local Plan (2016-2031) ("the Local Plan") which will positively plan for and manage future development in the borough. In particular, the new Local Plan is responding to significant population growth and the need to ensure existing and future residents have a range of housing choices and local jobs, together with accessible social infrastructure, such as schools and open space.
- 1.2 The Local Plan has identified sites for allocation which enables the council to demonstrate how it is positively meeting its need for housing and employment and securing land for infrastructure to support the anticipated level of growth. The Site Allocation Methodology (SAM) forms part of the evidence base for the Local Plan to demonstrate the council's methodology for identifying suitable sites for residential, employment and infrastructure development to meet the identified needs set out in the Local Plan.
- 1.3 The SAM takes account of key requirements identified in government policy and guidance contained within the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) to justify the approach to site allocations within the Local Plan.
- 1.4 This document provides additional information on the stages undertaken following the Local Plan (regulation 18) consultation to assess the suitability of sites for allocation and supersedes the Site Selection Methodology Note (2016) which was consulted on alongside the draft Local Plan (regulation 18) from November 2016 to January 2017.

## Structure of the Report

- 1.5 This report has been structured in the following manner:
  - **Section 2. Policy Guidance:** Overview of the relevant national and regional policies which have informed the SAM.
  - **Section 3. Evidence Base:** Summary of the key evidence base documents which have informed the SAM.
  - **Section 4. Stages of the Methodology:** Outlines the key stages of the SAM
  - **Section 5. Site, Infrastructure and Viability Assessment:** Detailed approach for each stage in the SAM.
  - **Section 6. Preferred Site Allocations:** Sets out the preferred site allocations.
- 1.6 The application of SAM informs decision making regarding site allocations for inclusion within the submission version of the Local Plan (regulation 19).

## 2. Policy Guidance

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### National Planning Policy Framework

- 2.1 The government is committed to boosting housing supply and promoting economic growth. Assessing the housing and economic development needs of the borough and identifying specific and deliverable sites in order to facilitate this is a critical aspect of the Local Plan process.
- 2.2 The National Planning Policy Framework (NPPF) provides the overarching national planning guidance on Local Plan making and identification of sites for allocation. Crucially, the NPPF suggests that a Local Plan must allocate sufficient land in appropriate locations to ensure supply for the 15-year plan period. The core planning principles identified in paragraph 17 of the NPPF note that local plans should “*set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities*”. Elsewhere, it states that:
- Planning should “identify and *then* meet the housing, business and other development needs of an area” (paragraph 17).
  - Planning should “encourage the effective use of land by reusing land that has been previously developed (brownfield land) provided that it is not of high environmental value” (paragraph 17).
  - Local Plans should identify “key sites which are critical to the delivery of the housing strategy over the plan period” (paragraph 47).
  - Local planning authorities should “allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres”(paragraph 23).
  - Local Plans should “plan positively for the development and infrastructure required in the area” (paragraph 157).
  - Local Plans should “allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate” (paragraph 157).
  - Local Plans should be deliverable, therefore “sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable” (paragraph 173).

### Planning Practice Guidance

#### Housing and Economic Land Availability Assessment (HELAA)

- 2.3 The government’s Planning Practice Guidance (PPG) on 'Housing and Economic Land Availability Assessment' (HELAA) (Reference ID: 3) is a technical study that determines the suitability, availability and achievability of land for development. However, it is silent on the issue of site selection methodologies for development plans. PPG recommends a staged approach to the HELAA, which is identified as an important evidence source to inform plan making that does not determine whether a site should be allocated for development. PPG notes that the HELAA provides information on the range of sites available to meet identified need, but the development plan itself determines which sites are most suitable to meet those needs (Reference ID: 3-003-20140306).
- 2.4 Helpfully, the PPG advocates a 5-stage approach in constructing a site selection methodology for HELAA, which has informed the approach taken to the site allocation methodology.

- Stage 1: Identification of sites and broad locations.
- Stage 2: Site/broad location assessment.
- Stage 3: Windfall assessment (where justified).
- Stage 4: Assessment review.
- Stage 5: Final evidence base.

2.5 The guidance also specifies the characteristics which should be recorded during the site survey, such as site size, boundaries, and location; current land use and character (reference ID 3-016-20140306). It goes on to note factors for the consideration of suitability, availability and achievability, all of which are accounted for within the site allocations methodology.

### **Viability and Plan Making Planning Practice Guidance**

2.6 The Viability and Plan-Making Planning Practice Guidance describes appropriate methodologies that should be adopted when undertaking viability testing for Local Plans.

2.7 A number of provisions within this guidance have influenced the council's approach to selecting site allocations to viability test, including the following. :

- Evidence should be proportionate to ensure plans are underpinned by a broad understanding of viability (paragraph 5).
- Assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable (paragraph 6).
- Viability assessments should be proportionate, but reflect the range of different development, both residential and commercial, likely to come forward in an area and needed to deliver the vision of the plan (paragraph 9).

### **London Plan**

2.8 The adopted London Plan (Greater London Authority, 2016) sets out how social infrastructure should be planned for to meet the needs of a growing population and of new developments. It encourages Local Plans to ensure adequate social infrastructure is provided to support new development. It acknowledges that adequate provision for social infrastructure is particularly important in areas of major new development and regeneration (see policy 3.16).

### **Implications for the Site Allocations Methodology**

2.9 It is clear that the national and regional policy supports the allocation of sufficient land to ensure the objectively assessed needs arising from housing, employment and infrastructure is supported over the 15-year plan period. In light of this, sites have been allocated as part of the positive planning process to make sure the council has the infrastructure needed to support the level of growth set out in the Local Plan. If sites were not identified and safeguarded for specific uses, the council would be at risk of not being able to provide services for its communities. However, the allocation process and deliverability of sites will need to be in accordance with national policy.

### **Site Selection**

2.10 The allocation of sites must meet national planning policy, which specifically addresses the topic of using a proportionate evidence base (see paragraph 158 of the NPPF). A Local Plan must be justified as "the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence" (see paragraph 182). The consideration of reasonable alternatives is therefore one of the key tests of soundness. How the various sites that have been put forward for consideration and how they have performed against each other when measured against a range of set criteria is therefore relevant to satisfying this test.

2.11 In the spirit of the NPPF's 'presumption in favour of sustainable development', it is also imperative that the methodology ensures that proposed allocations do not cause significance adverse harm socially, environmentally or economically.

Deliverability

2.12 As part of the SAM, the council also took account of viability. The appropriate method for assessing viability of sites and testing Local Plan policies is through a viability assessment. The council appointed BNP Paribas Real Estate to prepare a viability assessment on its behalf and this has been published alongside the submission version of the Local Plan.

2.13 The Viability and Plan-Making Planning Practice Guidance guides the direction and application of policy within the NPPF.

### 3. Evidence Base

3.1 A range of evidence base sources have informed the site allocation process. These are detailed below.

**Table 1: Evidence Base: Summary**

Document	Summary
<b>Five-Year Housing Land Supply and Housing Trajectory Statement (2018)</b>	The government requires local planning authorities to identify and maintain a five year supply of deliverable land for housing. This document sets out the London Borough of Tower Hamlets five-year supply position, as of 1 August 2017. The document also identifies deliverable and developable housing sites in the borough used to project development needs over the Local Plan period (2016-2031).
<b>Integrated Impact Assessment (2017)</b>	The IIA comprises: a Sustainability Appraisal (SA), Health Impact Assessment (HIA), Equalities Impact Assessment (EQIA) and a Habitat Regulation Assessment (HRA).  A SA is to ensure that decisions are made in accordance with the principles of sustainable development. The appraisal sets out measures or interventions to offset, reduce or militate against adverse effects and maximise beneficial effects of each site allocation, as far as is practicable.
<b>Site Allocation Sequential and Exception Tests (2017)</b>	For sites which fell within flood zone 2 and above, the council applied the sequential and exception test. The test compares the site proposed for development with other available sites to find out which has the lowest flood risk.
<b>Site Allocations - Heritage Assessment (2018)</b>	The Infrastructure Delivery Plan (a previous iteration from 2016) flagged up the need to undertake a heritage assessment for site allocations to ensure the boroughs historic fabric is adapting to change sustainably.
<b>Strategic Flood Risk Assessment (SFRA) (2017)</b>	The output from the SFRA was be used to determine which flood zone sites fell within each site allocation.
<b>Infrastructure Delivery Plan (IDP) (2017)</b>	The IDP identifies the borough's social infrastructure requirements. It sets out what is needed, where it is needed and when it is needed. Each infrastructure type is accompanied by a table of projects which provides further detail on delivery, funding sources, costs and identifies whether there are any funding gaps.
<b>Local Plan Viability Assessment (2018)</b>	This document demonstrates that the policies and sites set out in the Local Plan are deliverable and development in the area is viable when accounting for the scale of policy burdens and obligations.

3.2 The council has identified several stages during the SAM process where the above key evidence base documents have informed decision making. Further details of how the above evidence base documents have informed the decision making process is set out in section 5.

## 4. Stage of the Methodology

### Approach

- 4.1 In accordance with the NPPF, consideration of sites for allocation needs to demonstrate that all reasonable alternatives have been assessed consistently and thoroughly. The SAM will take the form of a staged process which comprises the application of a series of more detailed assessments to identify the most suitable sites for allocation. The assessment may result in sites being excluded at each stage of the process.
- 4.2 Undertaking the SAM in five stages enables for effective comparison of the relative merits being considered with a range of other factors. However, the assessment at stage 5 is concerned with the commercial deliverability of a site which remains a critical factor in an uncertain economic environment. Further detail on each of the proposed stages is set out in chapter 5.

**Table 2: Site Allocation Methodology Stages**

Stage	Task	Output	Local Plan Stage
<b>1. Identify strategic sites for allocation</b>	<ul style="list-style-type: none"> <li>Set out how sites were sourced</li> <li>Set out the requirements for a strategic site for allocation</li> <li>Undertake a desk top site analysis – suitability, availability and achievability.</li> </ul>	Initial list of potential sites	Pre-initial engagement
<b>2. Identify initial infrastructure requirements and match with suitable site</b>	<ul style="list-style-type: none"> <li>Identify infrastructure needs in line with the draft IDP (2016)</li> <li>Set out the criteria (physical and spatial needs) for each infrastructure requirements to enable delivery, such as location, size etc. and source of information</li> <li>Match sites with infrastructure requirements and specifications</li> </ul>	Initial list of infrastructure requirements matched with sites  List of proposed site allocations for regulation 18 consultation	Pre-initial engagement
<b>3. Undertake assessments (part 1) of proposed site allocations</b>	<ul style="list-style-type: none"> <li>Initial site capacity assessment</li> <li>Sustainability appraisal, flood risk assessment and initial viability assessment.</li> </ul>	Detailed site allocations in the draft Local Plan	Regulation 18 consultation
<b>4. Review and refine proposed site allocation following the regulation 18 consultation</b>	<ul style="list-style-type: none"> <li>Review and update site assessment and constraints having regard to further evidence base and consultation.</li> <li>Review and update infrastructure requirements on each site, in line with the final IDP (2017)</li> </ul>	Refined list of proposed site allocations and infrastructure requirements.	Post regulation 18 consultation
<b>5. Undertake assessments (part 2) of potential site allocation</b>	<ul style="list-style-type: none"> <li>Final site capacity assessment</li> <li>Heritage assessment</li> <li>Sequential and exception test</li> <li>Viability assessment</li> </ul>	List of final site allocations for regulation 19 consultation	Regulations 19 consultation

## 5. Site, Infrastructure and Viability Assessment

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### Stage 1: Site Identification

5.1 The starting point for the site selection process is to ensure that the council has as wide range of site options as possible so that all reasonable site options have been identified and assessed. When undertaking this stage, the PPG guidance on HELAA heavily influenced the process.

5.2 The PPG advises that plan makers should be proactive during the desktop stage in identifying a wide range of possible sites and broad locations for development including existing sites that could be improved, intensified or changed.

#### Stage 1.a – Site Source

5.3 With regard to the site threshold, the PPG advises for HELAA's that: "The assessment should consider all sites and broad locations capable of delivering five or more dwellings or economic development on sites of 0.25ha (or 500m<sup>2</sup> of floor space) and above. Where appropriate, plan makers may wish to consider alternative site size thresholds." (Reference ID: 3-011-20140306).

5.4 The SAM considered all sites capable of delivering 500 net additional homes (the threshold is derived from the London Plan - policy 3.7) or above 0.25 hectares and met the following key objectives:

- Critical to make a significant contribution to meeting the boroughs housing target or will deliver a significant amount employment floorspace and infrastructure over the plan period.
- Requires additional guidance to manage the scale of development that will come forward.
- Delivers the spatial vision of the Local Plan.

5.5 To ensure that all reasonable site options have been considered in developing the Local Plan, sites included in the assessment were drawn from a number of sources, including the following.

- Submitted sites received from the call for sites information gathering exercise (June-July 2015) and initial draft Local Plan consultation (December 2015-January 2016) which identified 54 sites in total.
- Potential housing development sites from the Five-Year Housing Land Supply and Housing Trajectory Statement (2018), comprising the following.
  - Existing site allocations – as set out in the adopted Managing Development Document Development Plan Document (2013).
  - Poplar Riverside Housing Zone sites.
  - Unimplemented/outstanding planning permissions for residential use.
- Vacant employment development sites.

#### Stage 1.b Desktop Analysis

5.6 Stage 1 of the methodology also involves an initial desktop analysis of identified sites and is the first part of the process that facilitates an initial judgment as to whether a site is appropriate.

5.7 The council has access to information in the form of existing maps, databases and studies. This information helped to assess the suitability, availability and achievability of sites.

5.8 The analysis was undertaken using a joint desk top and site visit survey where required. The assessment ensured that each site is looked at comprehensively on its own merits and recorded in a consistent way. The assessment criteria are detailed in appendix 1. Sites which performed well with a score of 70 and above were taken forward to stage 2.

## Stage 2: Infrastructure Site Match

### Determining which infrastructure uses require a site allocation

5.9 As part of preparing a new Local Plan, the council needs to demonstrate how it is positively meeting its need for housing and employment. In doing so, infrastructure uses were identified in the Infrastructure Delivery Plan (2017) which is required to support the anticipated level of growth in the borough. These infrastructure types include:

- primary schools;
- secondary schools;
- community/local presence facilities (e.g. Idea Store, library or archives facility)
- open spaces (strategic and small);
- health facilities; and
- leisure facilities.

5.10 Further detail with regard to infrastructure requirements and needs is contained within the council's IDP (2017).

### Matching suitable sites with infrastructure

5.11 After identifying which uses require a site allocation, criteria were developed to identify the physical and spatial needs of each use. Specific criteria were informed by discussions with relevant internal and external service providers (e.g. NHS and Transport for London), existing evidence base and policies.

5.12 The criteria for each infrastructure type was developed with a score and weighting in accordance with policy direction of the emerging Local Plan. For each use the site scores were ranked and further interrogated for factors outside of the criteria process (e.g. officer knowledge of relevant planning applications and knowledge of local context e.g. setting of a local heritage asset). The criteria assessment is set out in appendix 2.

5.13 The assessment resulted in 26 proposed sites identified for allocation which is set out in appendix 3. These sites were published in the draft Local Plan (regulation 18) and were consulted on from November 2016 to January 2017. Following consultation on the draft Local Plan (regulation 18) the proposed sites and infrastructure requirements were further assessed and refined, as part of stage 4 of the SAM.

## Stage 3: Site Assessment (Part 1)

5.14 Stage 3 represents the outcome of the detailed assessments undertaken in stage 2 and subsequently, the sites which meet the essential infrastructure requirements specification. Further to stage 1 and 2, this stage provides a further opportunity to objectively screen and assess sites taking into account a range of factors to guide choices over site allocations in the Local Plan.

### Site Capacity Assessment

5.15 The PPG advises that calculating housing potential should be guided by existing or emerging plans and locally determined policies on densities. In accordance with the PPG, the potential development capacities such as the number of dwellings for sites were estimated based on the density matrix in the adopted London Plan (see policy 3.4). Where an extant planning permission was relevant on a potential site allocation, the level of development in terms of residential and commercial uses informed the site capacity. Information from an extant planning permission provides a greater level of site analysis which was considered a council view as appropriate development on the site.

5.16 The capacity assessment informed how each of the potential site allocations will contribute to meet the boroughs population growth for new homes and jobs.

### **Integrated Impact Assessment**

5.17 The IIA recommends mitigation measures where impacts of the proposed development are significant. These measures have also formed the basis of the site-specific requirements and will inform the future design and scale of the development for the final site allocations. The site allocation assessment is included as an appendix to the IIA that accompanies the Local Plan at the publication stage (regulation 19).

### **Strategic Flood Risk Assessment**

5.18 The SFRA informs and facilitates the decision making process to direct development in lower flood risk areas. However, given that the boroughs growth is located in higher risk areas, this was not possible as alternative sites to accommodate new homes, jobs and infrastructure were limited. The assessment informed where the application of the sequential test and exception test should be applied and recommended flood risk mitigation measures for each site, where necessary. Consideration of this assessment are referenced for each site allocation in the Local Plan.

### **Viability Assessment**

5.19 Following the capacity assessment, the council selected a sample of sites to test. The council's overarching approach to selecting sites for testing has involved undertaking a sampling exercise that focuses on sites on which the Local Plan will rely whilst avoiding excessive detail.

5.20 Guidance relating to viability testing of Local Plan describes that not every site needs to be tested. In particular, paragraph 6 of the Viability and Plan Making Planning Practice Guidance states:

*“Assessing the viability of plans does not require individual testing of every site.....Assessment of samples of sites may be helpful to support evidence and more detailed assessment may be necessary for particular areas or key sites on which the delivery of the plan relies”.*

5.21 In addition, a number of further practical matters (see appendix 6) have been considered, including the following:

- Policy requirements of residential development are much more likely to impact on viability, so testing has focused on residential led schemes.
- Testing the sites that propose to deliver the most housing (i.e. contribute most to the delivery of the Local Plan).
- Not testing sites where there is a planning permission in place that is likely to be delivered or has already been implemented.
- Where a number of sites have similar characteristics, only one of these sites has been tested.
- Testing the sites that have the most significant cost burdens which may include the provision of infrastructure.

5.22 The results from the assessment are contained in the viability assessment which supported the Local Plan. The results from the assessment informed stage 4 of the SAM which considered viability.

## Stage 4: Review and Refine: Sites and Infrastructure Requirements

### Site Review

- 5.23 The draft Local Plan consultation (regulation 18) identified 26 potential site allocations. The approach set out in stages 1-3 is predicated on the assumption that further information on site suitability, availability and achievability will be received in response to the draft Local Plan consultation (regulation 18). Therefore, the assessment made in advance of the draft Local Plan consultation was based on the available information at the time of drafting. Consultation on the draft Local Plan provided the opportunity for further review and refinement in light of comments received on the site allocations and new evidence base to demonstrate whether the site is developable and deliverable.
- 5.24 Stage 4 is an essential stage in the methodology as it enabled conclusions to be drawn about the council's assessment of suitability, availability and achievability for sites which were undertaken in Stage 1. Each site was screened for the second time against the criteria set out in appendix 1.

### Infrastructure Requirements

- 5.25 It was also essential to review and refine the infrastructure requirements for each site allocation that was assessed in stage 2. The review was informed by new evidence base and internal discussions with the council's service areas to prioritise and finalise infrastructure requirements. Table 3 summaries the infrastructure requirements which have informed the final stage of the SAM.

**Table 3: Infrastructure Requirements**

Type of infrastructure	Number of facilities needed	Number of sites allocated	Size criteria		Location criteria	
			Size	Source	Location	Source
Primary schools	6 facilities <sup>1</sup>	9	Land area: 0.4 hectares  2 forms of entry per facility. (210 pupils per forms of entry)	London Borough of Tower Hamlets Building Development Team, Children’s and Adult’s Resources	Lower Lea Valley  Isle of Dogs and South Poplar	Spatial Assessment need for Schools report (2018)
Secondary schools	4	5	Land area: 1.5 hectares  6 forms of entry per facility. (150 pupils per forms of entry)	London Borough of Tower Hamlets Building Development Team, Children’s and Adult’s Resources	Borough-wide with a preference to areas of high development.  Good accessibility	GLA 2017 - school roll projections  IDP and housing trajectory
Community use facilities (e.g. Idea Store or archives facility)	2 – 4	4 (including 1 re-provision of existing facility)	1,000 square metres	London Borough of Tower Hamlets Strategy, Performance & Resources Team	Areas with limited access to Idea Stores.  Town centres	Infrastructure Delivery Plan  Local Plan
Strategic open spaces	Up to 220 hectares of open space	9	1 hectare	London Plan  Tower Hamlets Open Space Strategy	Area of open space deficiency	Open Space Strategy
Small open spaces (“pocket park”)		10	400 square metres	London Plan  Tower Hamlets Open Space Strategy	Borough-wide	Infrastructure Delivery Plan
Health facilities	5 - 6 new primary healthcare facilities, 1 specialist facility.	8 (including 1 specialist facility and 1 re-provision of existing facility)	1,000 square metres.	London Borough of Tower Hamlets Public health Team	Close to areas of high development (east of borough).  Town centres	Infrastructure Delivery Plan and housing trajectory
Leisure facilities	Qualitative analysis in the Indoor facilities Strategy (2017) identifies the need for 1 new facility (Bishopsgate Goods Yard).	2 (including 1 re-provision at Westferry Printworks site)	4099.6 square metres	Infrastructure planning calculation based on current provision on site.	Bishopsgate Goods Yard	Indoor Facilities Strategy (2017)

<sup>1</sup> Updated figures from the Spatial Assessment Need for Schools report (2018)

5.26 The following information on the approach to site allocations in terms infrastructure is set out below. This information should be read alongside the council's Infrastructure Delivery Plan which provides more detail.

#### Primary Schools

5.27 Primary schools have been allocated on the following preferred sites which best match the criteria.

- Ailsa Street
- Crossharbour Town Centre
- Limeharbour
- Marsh Wall East
- Marsh Wall West (secured through planning permission)
- Millharbour South
- Millharbour (secured through planning permission)
- Reuters
- Wood Wharf (secured through planning permission)

5.28 In terms of criteria size requirements, primary schools are assumed to need 0.4 hectares of land. This is assumed to deliver a 2 form of entry ('FE') School which is the council's preferred approach to delivering primary schools.

5.29 Where a primary school is proposed as part of an approved planning application or subject pre-application discussion, the floor area of the proposed development on the site has informed the viability testing.

5.30 The Spatial Assessment Need for schools report (2018) identifies a need to deliver an additional 12FE (equating to 6 2FE primary schools) over the Local Plan period. The council has allocated more primary schools than evidence suggests is needed. This is for a number of reasons:

- The council has a statutory requirement to deliver enough places but cannot guarantee any of the site allocations will be bought forward for delivery.
- In some instances a site may only be able to deliver a 1FE school due to site constraints.
- For some sites when they come forward for delivery, demand in that particular area may indicate that only a 1 FE primary school is required.
- Other issues, particularly air quality, may render an allocated site incapable of delivering a primary school when it comes forward for delivery.

5.31 Because the majority of development and population growth is projected to occur in the east of the borough and in particular in the Isle of Dogs and South Poplar area, these locations are the areas of focus in terms of site allocations for the provision of new primary schools.

#### Secondary Schools

5.32 Secondary schools have been allocated on the following preferred sites which best match the criteria.

- Billingsgate Market
- Bow Common Gas Works
- Leven Road Gas Works
- London Dock (secured through planning permission)
- Westferry Printworks (secured through planning permission)

5.33 In terms of criteria size requirements, secondary schools have been assumed to need 1.5 hectares of a site. This is assumed to deliver a 6 form of entry ('FE') school which is the council's preferred approach to delivering secondary schools. Sites have been selected on the basis that they are large enough to reasonably accommodate a secondary school. It should be noted that secondary schools

can be more strategically located than their primary counterparts. This is because pupils are able to travel much further to attend secondary school.

#### Local Presence/Community Facilities

5.34 Local presence/community facilities (e.g. Idea Store, library or archives facility) have been allocated on the following preferred sites which best match the criteria.

- Bishopsgate Goods Yard
- Crossharbour Town Centre
- Crisp Street Town Centre (re-provision of existing Idea Store)
- Wood Wharf (Idea Store secured through planning permission)

5.35 With changes to the way services are funded, the council may need to evolve the way it provides community/local presence facilities which may result in the need to combine council services in a single location. This is why the name of this asset class is one that covers community use facilities in general as opposed to just Idea Stores and libraries.

5.36 It has been assumed that a facility would need 1000 square metres of floorspace as part of a mixed use development. There are a number of existing Idea Stores and libraries in the borough and consideration was given to areas which fall outside a catchment of an existing Idea Store. To ensure a community/local presence facility is accessible, the Local Plan seeks to direct them towards town centres. Areas with good access to Idea Stores and town centre locations were key factors in determining which sites are suitable.

#### Strategic Open Space

5.37 Strategic open space has been allocated on the following preferred sites which best match the criteria.

- Aspen Way
- Limeharbour
- Bow Common Gas Works
- Whitechapel South
- Bishopsgate Goods Yard
- Wood Wharf (secured through planning permission)
- Leven Road Gas Works
- Marian Place Gas Works and The Oval

5.38 Sites have been specifically identified if they fall within an area of open space deficiency in terms of access to 1 hectare or could contribute towards addressing areas of open space deficiency. Sites have also been selected on the basis that they are large enough to reasonably accommodate 1 hectare of consolidated open space.

### Small Open Space

5.39 The borough has an acute level of open space deficiency which will continue to rise as population increases. Sites which have not been allocated for strategic open space have been identified to deliver 0.4 hectares of small open space where they are not constrained by the allocation of other types of infrastructure. This is to ensure all strategic site allocations help to meet the boroughs shortfall in open space.

5.40 Small open space has been allocated on the following sites.

- London Dock
- Ailsa Street
- Billingsgate Market
- Marsh Wall East
- Marsh Wall West
- Millharbour South
- Millharbour
- North Quay
- Reuters Ltd
- Riverside South

### Health Facilities

5.41 Health facilities have been allocated on the following preferred sites which best match the criteria.

- Crossharbour Town centre (re-provision and expansion of existing)
- London Dock (secured through planning permission)
- Marsh Wall East
- Marsh Wall West
- Millharbour South
- Millharbour
- Wood Wharf (secured through planning permission)
- Whitechapel South (sexual health clinic)

5.42 Where there is an existing health facility on site, as per the emerging Local Plan, the council will seek the re-provision of the facility and where required expand the provision as part of redevelopment.

5.43 Where there is an existing health facility on site, as per the emerging Local Plan, the Council will seek the re-provision of the facility and where required expand the provision as part of redevelopment.

5.44 All new facilities are assumed to be primary care facilities – taking its broader definition that includes but is not limited to general practice. The NHS is required to make sure a range of services are provided and the council can only help ensure that there are enough appropriate facilities to accommodate these services. All new facilities are assumed to be 1,000 square metres in size as this is the optimum size of facility prescribed by the NHS for general [practice facilities. In accordance with advice from the council's Public Health team, it is also assumed that each full-time equivalent GP provided by each facility requires 150 square metres of floorspace.

5.45 Facilities are directed in the areas of highest growth in the Isle of Dogs and South Poplar area. The council has over allocated by one facility to account for potential fluctuations in population growth and the fact that the council cannot guarantee all of the sites will come forward in the plan period.

### Leisure Facilities

5.46 Bishopsgate Goods Yard is the only site within the Local Plan allocated to provide a new leisure facility.

5.47 The Indoor Facilities Strategy (2017) identifies a strategic option to:

*“Investigate any opportunities for adding indoor sports provision as part of the Bishopsgate Goods Yard development, potentially as a joint venture with partners, including neighbouring councils”.*

5.48 The site currently contains 10 five-a-side football pitches. An assumption has been made that the new facility would constitute the re-provision of these pitches. An allowance of approximately 4,000 square metres has been made in this regard.

### **Final Site Allocations**

5.49 The results from this stage of the assessment conclude the final site allocations that will be identified in the submission version of the Local Plan and are also set out in appendix 4.

5.50 The assessment and review undertaken at stage 4 omitted the following five sites: Oban Street; Herucules Wharf; Clove Crescent; Dockland Delivery Office; and The Highway. It also amended the boundary of sites to a greater extent, including; Chrisp Street Market, Aspen Way, Limeharbour and Crossharbour Town Centre. The justification for these omissions and amendments are set out in appendix 5.

## **Stage 5: Site Assessment (Part 2)**

5.51 Stage 5 represents the outcome of the detailed site refinement undertaken in stage 4 and subsequently, the sites with a likely prospect for allocation, based on their overall performance through stages 1 to 4.

5.52 This stage concludes several detailed thematic considerations which will influence and inform the relative merits of each site. The combination of these assessments enabled officers to form a ‘preferred’ list of sites, together with detailed, land use, infrastructure requirements, design principles and delivery consideration for consultation.

### **Site Allocations - Sequential and Exception Tests**

5.53 This assessment follows on from the SFRA and was undertaken in consultation with the Environment Agency to demonstrate that there are no suitable, available and achievable sites outside of those considered with a lower probability of flooding that could be considered to be ‘reasonably available’.

### **Site Allocations - Heritage Assessment**

5.54 The purpose of this assessment is to inform the detailed design principles for the ‘preferred’ site allocations. It demonstrates how the built environment has been considered in the site selection process and to assess the likely impact on heritage assets, both designated and undesignated; opportunities to address site constraints through good design and mitigate any impacts arising from development.

### **Final Site Capacity Assessment**

5.55 Following consultation, all sites were reviewed and where site allocation boundaries were amended, the development capacities were updated accordingly. Following the approach set out in the initial site capacity assessment (see paragraph 5.15), the conclusions were drawn to inform the final stage of the process to determine site deliverability through a site viability assessment.

### **Viability Assessment**

5.56 The council has allocated 21 sites and selected 14 sites to a viability test. These are set out in appendix 6 which identifies the following.

- Capacities of the proposed site allocations assumed for the purposes of the viability assessment.

- Sites that have been tested as part of the viability assessment and the reasons for the decision to not test some of the sites.
- Infrastructure allocated on each of the site allocations.

5.57 For further detail, the Local Plan Viability Assessment (2017) identifies the sites which have been tested and the results from the assessment.

## **Appendices**

**Appendix 1: Site Assessment**

**Appendix 2: Infrastructure Requirements**

**Appendix 3: Proposed Site Allocations (Local Plan Regulation 18)**

**Appendix 4: Proposed Site Allocations (Local Plan Regulation 19)**

**Appendix 5: Site Assessment**

**Appendix 6: Viability Assessment**

## Appendix 1: Site Assessment

Assessment				Score		
	Indicator	Approach	Score weighting (3 high-1 low)	3	2	1
Suitability	Flood Zone	Assessment will be undertaken using the latest GIS layers from the Environment Agency.	2	Flood zone 1	Flood zone 2	Flood zone 3a
	Heritage Designations	Assessment will focus on heritage assets including scheduled ancient monuments, historic parks and gardens, and whether the site falls within a conservation area.	1	Site is not likely to affect heritage assets due to their distance from the site.	Site is located within the setting of a heritage asset and effects can be mitigated.	Site is located within a Conservation Area or adjacent to a Listed Building or other heritage asset and effects can be mitigated.
	Air Quality	Assessment will be undertaken using the latest GIS layers from the GLA.	1	Site lies outside of areas identified as being at risk of poor air quality.	Site lies within an area which has been identified as being at risk of poor air quality, but it is likely that the risk could be mitigated or reduced.	Site lies within an area which has been identified as being at risk of poor air quality, and it is unlikely that the risk could be mitigated.
	Health and Safety	Assessment will be undertaken using GIS. This criterion will assess the development sites that may be entirely or largely precluded due to their proximity to a notifiable installation.	2	Not within a specified consultation zone of a notifiable installation (Health and Safety Executive).	Within the specified consultation zone of a notifiable installation – development however is unlikely to be precluded.	Within a specified consultation zone of notifiable installation – development likely to be precluded.
	Bio-diversity	Assessment will be undertaken using the latest GIS layers to determine areas of deficiency in access to nature in Tower Hamlets (Greenspace Information for Greater London, 2015)	1	Not within an area of sensitivity or within an area of low sensitivity.	Within an area of medium sensitivity.	Within an area of high sensitivity.
	Contamination	Assessment will be undertaken using existing or where vacant previous land use which may result in potential contamination	1	Existing or previous use is low risk.	Existing or previous use is likely to be medium or high risk.	Significant contamination issue are likely which will impact on the scope of development.
	Employment Designations	Assessment will be undertaken using the Employment Land Review evidence base	1	Not within a designated employment area.	Within a designated employment area and will result in the loss of employment space.	Within a designated employment location where residential development is not supported.
	Town Centre	Assessment will be undertaken using the emerging Town Centre Retail Study evidence base	1	Will increase the vitality of a town centre for example by introducing an active frontage or utilising under-used space.	The site will have no impact on a town centre.	The site would result in the loss of a main town centre use (e.g. active primary retail frontage).
	Accessibility - Public Transport Accessibility Level (PTAL)	Assessment will be undertaken using existing PTAL on Transport for London website	2	4 to 6	2 to 3	0 to 1

Assessment				Score		
Availability	Safeguard alternative uses	Assessment will be undertaken using existing and potential policy infrastructure/use safeguards (waste sites and wharfs)	1	Not within/adjacent to an existing/potential safeguarded site.	Within a potential safeguarded use/site.	Within an existing safeguarded use/site.
	Ownership	Assessment will be based on information from call for sites, planning application, local knowledge and land registry searches.	3	Single ownership and the developer or landowner who has expressed an intention to develop, or the landowner has expressed an intention to sell	Multiple ownership with the opportunity for comprehensive development	Potential legal or ownership issues
	Existing use	Local knowledge, GIS, Google maps, council tax and land searches will be used to assess this criterion.	3	Site is vacant	Site is in active use but could be reprovided as part of development.	Site is in current active use which may need to be relocated (e.g. business or community use includes recreational open space).
	Planning status	Assessment on whether the site is has a live application or implementing a pa	2	Developer interest to bring the site forward	Live or granted planning application	Site under construction
	Potential delivery date	Assessment will be based on information from the call for sites and local knowledge	3	2016-2021	2022-20273	2028-2031
Achievability	Site capacity	Potential to deliver a significant amount of housing (500 units) alongside infrastructure	2	500 or more	300-500	up to 300
	Viability considerations	Assessment will be based on information from the call for sites, local knowledge and a viability assessment.	3	No viability issues known	Potential viability constraints due to site constraints	Significant viability constraints due to site constraints

## Appendix 2: Infrastructure Requirements

Type of infrastructure	Size criteria		Assessment		Location criteria		Assessment	
	Size	Source	Weighting	Scoring	Location	Source	Weighting	Scoring
Primary schools	0.4 hectare	London Borough of Tower Hamlets Building Development Team, Children's and Adult's Resources  Department for Education Building Bulletin	3	3 - Sufficient land to accommodate school  1 - Insufficient land to accommodate school	Within areas of high growth (Lower Lea Valley and Isle of Dogs and South Poplar)	GLA 2017 - school roll projections.  Infrastructure Delivery Plan and housing trajectory.	3	3 - Within Lower Lea Valley and Isle of Dogs South Poplar sub areas  1 - Falls outside of the Lower Lea Valley and Isle of Dogs South Poplar sub areas
					Good public transport accessibility	PTAL		2
Secondary schools	1.5 hectare	London Borough of Tower Hamlets Building Development Team, Children's and Adult's Resources  Department for Education Building Bulletin	3	3 - Sufficient land to accommodate school  1 - Insufficient land to accommodate school	Borough-wide with a preference to areas of high development.	GLA 2017 - school roll projections.  IDP and housing trajectory	3	3 - Within Lower Lea Valley and Isle of Dogs South Poplar sub areas (highest growth)  1 - Falls outside of the Lower Lea Valley and Isle of Dogs South Poplar sub areas
					Good public transport accessibility	PTAL		3
Local presence/community facilities (e.g. Idea Store or archives facility)	1,000 square metres	London Borough of Tower Hamlets Strategy, Performance & Resources Team	3	3 - Sufficient land to accommodate a facility  1 - Insufficient land to accommodate a facility	Areas with limited access to Idea Stores.	Idea Store Strategy	3	3 - Within City Fringe and Isle of Dogs and South Poplar sub areas  1 - Falls outside an area of limited access
					Within town centres	Local Plan		3

Type of infrastructure	Size criteria		Assessment		Location criteria		Assessment	
	Size	Source	Weighting	Scoring	Location	Source	Weighting	Scoring
Strategic open Space	1 hectare	London Plan (2016) Open Space Strategy	3	3 - Sufficient land to accommodate open space 1 - Insufficient land to accommodate open space	Area of open space deficiency	Open Space Strategy	3	3 - Falls within an area of open space deficiency 2 - Close proximity to an area of open space deficiency 1 - Falls outside an area of open space deficiency
Smaller open spaces ("pocket park")	0.4 hectare	London Plan Open Space Strategy	3	3 - Sufficient land to accommodate open space 1 - Insufficient land to accommodate open space	Borough-wide	IDP.	1	3 - All sites will be considered
Health facilities	1,000 square metres	London Borough of Tower Hamlets Public health Team	3	3 - Sufficient land to accommodate a facility 1 - Insufficient land to accommodate a facility	Within areas of high growth (Lower Lea Valley and Isle of Dogs and South Poplar)	IDP and housing trajectory	3	3 - Within Lower Lea Valley and Isle of Dogs South Poplar sub areas (highest growth) 2 - Falls outside of the Lower Lea Valley and Isle of Dogs South Poplar sub areas
					Good public transport accessibility	PTAL	2	3 - PTAL 4-6 2 - PTAL 2-3 1 - PTAL 0-1
Leisure facilities	4099.6 square metres	Infrastructure planning calculation	3	3 - Sufficient land to accommodate a facility 1 - Insufficient land to accommodate a facility	Bishopsgate Goods Yard	Indoor Facilities Strategy	3	3 - Within Bishopsgate Goods Yard 1 - Outside Bishopsgate Goods Yard

### Appendix 3: Proposed Site Allocations (Local Plan Regulation 18)

#	Site	Infrastructure Requirements	Land Use Requirements
1	Aspen Way	Open space	Housing Employment
2	Bishopsgate Goods Yard	Open space Idea Store	Housing Commercial and other compatible uses
3	Bow Common Gas Works	Primary and/or secondary school Open space	Housing
4	Billingsgate Market	Primary and/or secondary school Open space	Housing Employment Wholesale market (re-provision in suitable location in London, preferably retaining a partial local presence on site)
5	Ailsa Street	Primary school Open space	Housing Employment
6	North Quay	Open space	Office-led employment uses
7	Reuters Ltd	Primary school and/or secondary school Open space	Housing
8	Riverside South	Open space	Office-led employment uses
9	Hercules Wharf, Leamouth Peninsula South	Open space	Housing Employment
10	Clove Crescent	Secondary School Open space	Employment-led Other compatible uses, including housing
11	Limeharbour	Primary School Open space	Housing Employment
12	Marsh Wall East	Primary school Health facility Open space	Housing Employment
13	Marsh Wall West	Primary school Health facility Open space	Housing Employment
14	Millharbour	Primary school Health facility Open space	Housing Employment
15	Oban Street	Open space	Housing Employment
16	Crossharbour Town Centre	Idea Store Re-provision and expansion of a health facility Primary school	Housing Retail and other supporting town centre uses
17	Chrip Street Town Centre	Idea Store (re-provision)	Housing Local market (re-provision)
18	Wood Wharf	Primary school Open space Community Uses	Housing Employment
19	Millharbour South	Primary school Health facility Open space	Housing Employment
20	Westferry Printworks	Open space Secondary school Expanded leisure centre	Housing
21	Leven Road Gas Works	Primary and/or secondary school Open space	Housing
22	London Dock	Secondary school Open space Health facility	Housing Employment
23	Marian Place Gas Works and The Oval	Open space	Housing Employment
24	The Highway	Open space	Housing
25	The Docklands Delivery Office	Open space	Housing Employment
26	Whitechapel South	Open space Health facility (re-provision)	Employment

#### Appendix 4: Final Site Allocations (Local Plan Regulation 19)

Sub area	Site allocation	Infrastructure requirements	Land use requirements
City Fringe	Bishopsgate Goods Yard	Strategic open space	Housing
		Local Presence/community Facility	Employment: a range of floorspace sizes, including small-to-medium enterprises
		Leisure facility	
	London Dock	Secondary school	Housing
		Small open space	Employment: a range of floorspace sizes, including small-to-medium enterprises
		Health facility	
	Marian Place Gas Works and the Oval	Strategic open space	Housing
			Employment: a range of floorspace sizes, including suitable units for the needs of small-medium enterprises, start-ups and creative and tech industries
	Whitechapel South	Strategic open space	Other: Compatible community and social uses, including nurseries
			Employment-led (within the Local Employment Location) providing suitable units for the needs of life science, medical and research uses
Whitechapel South	Strategic open space	Housing	
		Health facility	
Central	Bow Common Gas Works	Secondary school	Housing
		Strategic open space	Re-provision of existing employment by way of intensifying employment job numbers.
	Chrip Street Town Centre	Idea Store (re-provision)	Retail and other compatible commercial uses including leisure uses such as a cinema
Lower Lea Valley	Ailsa Street	Primary school	Housing
		Small open space	Employment: re-provision of existing employment by way of intensifying employment job numbers through a range of floorspace sizes which support small-medium-sized enterprises, creative industries and retail.
		Safeguarded waste site	
	Leven Road	Secondary school	Housing
		Strategic open space	Employment: re-provision of existing employment by way of intensifying employment job numbers through a range of floorspace sizes which support small-medium-sized enterprises, creative industries and retail.
Isle of Dogs and South	Aspen Way	Strategic open space	Housing
		Community centre and associated football pitches (re-provision)	Employment: a range of floorspace sizes, including small-to-medium enterprises

Sub area	Site allocation	Infrastructure requirements	Land use requirements
Poplar		Tower Hamlets college (re-provision)	
	Billingsgate	Secondary school	Employment: Preferred Office Location (secondary) with ancillary supporting uses such as gyms, hotels, restaurants and retail.
		Small open space	Housing (25% maximum provision in terms of floorspace)
	Crossharbour Town Centre	Primary school	Redevelopment of the district centre providing retail floorspace and other compatible uses.
		Local Presence/community facility	Housing
		Health facility (re-provision)	
	Limeharbour	Primary school	Housing
		Strategic open space	Employment: a range of floorspace sizes, including small-to-medium enterprises
	Marsh Wall East	Primary school	Housing
		Health facility	Employment: a range of floorspace sizes, including small-to-medium enterprises
		Small open space	
	Marsh Wall West	Primary school	Housing
		Health facility	Employment: a range of floorspace sizes, including small-to-medium enterprises
		Small open space	
	Millharbour	Primary school	Housing
		Health facility	Employment: a range of floorspace sizes, including small-to-medium enterprises
		Small open space	
	Millharbour South	Primary school	Housing
		Health facility	Employment: a range of floorspace sizes, including small-to-medium enterprises
		Small open space	
	North Quay	Small open space	Employment: Preferred Office Location (secondary) with ancillary supporting uses such as gyms, hotels, restaurants and retail.
			Housing (25% maximum provision in terms of floorspace)
	Reuters Ltd	Primary school	Housing
Small open space		Employment: a range of floorspace sizes, including small-to-medium enterprises	
Riverside South	Small open space	Employment: Preferred Office Location (secondary) with ancillary supporting uses such as gyms, hotels, restaurants and retail.	
		Housing (25% maximum provision in terms of floorspace)	
Westferry Printworks	Secondary school	Housing	
	Leisure facility (re-provision)	Employment: a range of floorspace sizes, including small-to-medium enterprises.	

Sub area	Site allocation	Infrastructure requirements	Land use requirements
		Strategic open space	
	Wood Wharf	Primary school	Housing
		Idea Store	Employment: comprehensive mixed used development to provide town centre uses including small to medium sized enterprises and large floorplate offices.
		Health facility	
		Strategic open space	

## Appendix 5: Final Site Assessment

SITE	SUITABILITY	AVAILABILITY	ACHIEVABILITY	INFRASTRUCTURE REQUIREMENTS	RECOMMENDATION
Ailsa Street	Given the sites previous industrial use, there is a potential contamination issue and remediation will be required to facilitate development. However, this may not significantly affect the suitability of the site.	<p>Part of the site is safeguarded as a waste facility. Redevelopment of the safeguarded site is predicated on the need to relocate it and the boroughs apportionment target. However the remaining part of the site is able to come forward for redevelopment. Proximity to the safeguarded waste site could be managed through design and amenity.</p> <p>The site has multiple landowners and is currently being acquired by a single landowner. The site is currently subject to a live planning application.</p>	The site is able to accommodate more than 500 new homes and will significantly make a contribution to meeting the boroughs housing target.	<p>The primary school may be delivered on the existing Council former Bromley Hall school.</p> <p>The remaining part of the site will be expected to deliver open space.</p>	The site is considered suitable, available and achievable to deliver the required infrastructure.
Aspen Way	<p>The site is well located in terms of proximity to transport, town centres and employment areas.</p> <p>The Tower Hamlets Activity Area has been extended to include this site. Given its proximity to Aspen Way, there is a potential air quality issue; however this can be mitigated though design and green infrastructure measures.</p>	<p>The site is currently used as a DLR depot, with the opportunity to relocate or develop over it (via decking).</p> <p>The site boundary has been extended to include Tower Hamlets collage to facilitate better connections and integration between South Poplar and Canary Wharf.</p> <p>The site has multiple landowners, but largely remains in Transport for London ownership.</p>	The site is able to accommodate more than 500 new homes and will significantly make a contribution to meeting the boroughs housing target.	<p>The site meets the criteria to deliver strategic open space.</p> <p>The site boundary has been amended to a greater extent to include Tower Hamlets Collage, community centre and associated football pitches to achieve improved north-south connectivity. These are required to be re-provided as alongside the open space.</p>	<p>Boundary to be amended.</p> <p>The site is considered suitable, available and achievable to deliver the required infrastructure.</p>
Billingsgate Market	<p>The site is well located in terms of proximity to transport, town centres and employment areas.</p> <p>The Preferred Office Location (POL) boundary has been revised which provides greater flexibility in terms of land use mix. Given its proximity to Aspen Way, there is a potential air quality issue; however this can be mitigated though design and green infrastructure measures.</p>	<p>The site has a fish market with the scope to relocate.</p> <p>The site is in public ownership.</p>	<p>The site is able to accommodate more than 500 new homes and will significantly make a contribution to meeting the boroughs housing target. Given the employment designation, the site will so make a significant contribution to meeting the boroughs employment target.</p> <p>The site is considered viable.</p>	The site meets the criteria to deliver a secondary school and strategic open space.	The site is considered suitable, available and achievable to deliver the required infrastructure.
Bishopsgate Goods Yard	The site is well located in terms of proximity to transport, town centres and employment areas. However, there are a number of constraints in terms of heritage assets and views which will inform the scale of development.	<p>The site is currently a vacant with the elevated London Overground line running through its centre, and Shoreditch High Street station located to the north-west on Wheeler Street. The majority of the site comprises the inactive Braithwaite railway viaduct which is grade II listed.</p> <p>The site is subject to a submitted planning application.</p>	<p>The site is able to accommodate more than 500 new homes and will significantly make a contribution to meeting the boroughs housing target.</p> <p>The site is considered viable.</p>	<p>The site meets the criteria to deliver a Community/local presence facility and strategic open space.</p> <p>Further evidence has identified the site suitable for a Leisure Facility which should be provided through football pitches.</p>	The site is considered suitable, available and achievable to deliver the required infrastructure.

Bow Common Gas Works	The site is well located in terms of proximity to transport, town centres and employment areas. However, there are a number of heritage and potential contamination constraints in terms of the gas holders which are development considerations.	The site is in single ownership and currently vacant. The gas holders have been decommissioned and dismantled from the site.	The site is able to accommodate up to 500 new homes and will significantly make a contribution to meeting the boroughs housing target.  There are potential viability constraints.	The site meets the criteria to deliver a secondary school and strategic open space.	There are potential achievability constraints due to site specific issues.  The site is considered suitable and available which on balance with other policy considerations could deliver the required infrastructure.
Chrip Street Town Centre	The site is well located in terms of proximity to transport, town centres and employment areas. The site lies within the Lansbury Estate and includes a market place, an Idea Store and a Clock Tower which act as gateways to the market square.  There is an opportunity to improve role and function of the town centre and optimise land to accommodate additional homes alongside improvements to the market and reprovided the Idea Store.	The site is in single ownership and is subject to a live planning application.  The site boundary has been amended to reflect the live planning application.	The site is able to accommodate up to 500 new homes and will significantly make a contribution to meeting the boroughs housing target.	The site is required to re-provide the Idea Store as part of redevelopment.	Boundary to be amended.  The site is considered suitable, available and achievable to deliver the required infrastructure.
Clove Crescent	The site falls within a Local Employment Location which requires the re-provision of employment floorspace as part of redevelopment. The site has a significant amount of existing employment floorspace and its re-provision would be in the form of an employment-led redevelopment.  The amount of developable land to support the re-provision of existing employment floorspace, together with 500 new homes and infrastructure (primary school) is not sufficient to support this level of development.	The site is subject to redevelopment plans to intensify employment use. Construction works are underway to implement the proposal to facilitate this. This significantly affects likely prospects for this site coming forward comprehensively in the plan period.	Given the need to re-provide existing employment floorspace in line with policy, there is insufficient land to deliver 500 units or more alongside infrastructure.  Initial viability scoping concluded the site to be unviable with the re-provision of existing floorspace, 200 new homes and a primary school.	Given its employment designation and viability constraints the site is not suitable for a primary school.	The site is considered unsuitable, unavailable and unachievable to deliver the required infrastructure.  Site to be excluded
Crossharbour Town Centre	The site is well located in terms of proximity to transport, town centres and employment areas. The site comprises a health facility, community facility with a supermarket and associated car parking.  There is an opportunity to improve the role and function of the town centre and optimise land to accommodate additional homes alongside improvements to the super market and the provision of social infrastructure.	The site is known to have multiple landowners which may impact development deliverability.  The site is subject to an extant planning permission.	The site is able to accommodate more than 500 new homes and will significantly make a contribution to meeting the boroughs housing target.  The site is considered viable.	The site boundary has been amended to include a community facility. This can be re-provided as part of a community/local presence facility where its role and function can be maximised with other services.  The site meets the requirements to deliver a Community/local presence facility and a primary school.	Site boundary to be amended.  The site is considered suitable, available and achievable to deliver the required infrastructure.
Hercules Wharf	Given the sites previous industrial use, there is a potential contamination issue and remediation will be required to facilitate development. This is a development consideration, which may affect the site suitable.	The site is subject to redevelopment plans to provide 834 new homes, retail, employment and education uses. The existing planning permission PA/14/03594 will not deliver significant infrastructure to justify its allocation. Construction works are underway to implement the proposal to facilitate this.	The site is able to accommodate more than 500 new homes and will significantly make a contribution to meeting the boroughs housing target.	Given the site planning status its no longer suitable to deliver the required infrastructure.	The site is considered unachievable to deliver the required infrastructure.  Site to be excluded.

Leven Road Gas Works	The site is well located in terms of proximity to transport, town centres and employment areas. However, there are a number of heritage and potential contamination constraints in terms of the gas holders which are development considerations.	Part of the site is subject to a planning permission which is currently under construction. The remainder of the site is in single ownership, currently vacant and contains gas holders.	The site is able to accommodate more than 500 new homes and will significantly make a contribution to meeting the boroughs housing target.  There are potential viability constraints.	The site meets the criteria to deliver a secondary school and strategic open space.	There are potential achievability constraints due to site specific issues.  The site is considered suitable and available which on balance with other policy considerations could deliver the required infrastructure.
Limeharbour	The site is well located in terms of proximity to transport, town centres and employment areas.	The site comprises office and industrial buildings including the Harbour Exchange Square and Skylines Industrial Estate which are in separate landownership.  Skylines are currently subject to a live planning application.  The site boundary has been amended to include a private carpark. There is an opportunity for comprehensive redevelopment whereby the carpark would facilitate improved permeability and access to the primary school.	The site is able to accommodate more than 500 new homes and will significantly make a contribution to meeting the boroughs housing target.  The site is considered viable.	The site meets the criteria to deliver a primary school and strategic open space.	Site boundary to be amended.  The site is considered suitable, available and achievable to deliver the required infrastructure.
London Dock	The site is well located in terms of proximity to transport, town centres and employment areas.  The Highway runs along north of the site which impacts on the air quality.  There is a single-storey grade II listed warehouse running along the southern side of Pennington Street.	The site previously accommodated a large-scale print works building and is currently subject to a planning permission which is under construction to provide new homes, employment, retail, leisure and community uses, together with a secondary school and open space.	The site is able to accommodate more than 500 new homes and will significantly make a contribution to meeting the boroughs housing target.	The site meets the criteria and is required to deliver a secondary school and open space as part of the planning permission	The site is considered suitable, available and achievable to deliver the required infrastructure.
Marian Place Gas Works and The Oval	The site is well located in terms of proximity to transport, town centres and employment areas. However, there are a number of heritage and potential contamination constraints in terms of the gas holders which are development considerations.	The site has in multiple landowners with interim active employment uses. The majority of the site is vacant with the potential for comprehensive redevelopment.	The site is able to accommodate more than 500 new homes and will significantly make a contribution to meeting the boroughs housing target.  The site is considered viable	The site meets the criteria to deliver strategic open space.	The site is considered suitable, available and achievable to deliver the required infrastructure.
Marsh Wall East	The site is well located in terms of proximity to transport, town centres and employment areas.	The site has multiple landowners with active employment/commercial uses which may impact deliverability. However, comprehensive redevelopment would be encouraged to optimise the delivery of new homes and infrastructure.	The site is able to accommodate more than 500 new homes and will significantly make a contribution to meeting the boroughs housing target.  The site is considered viable.	The site meets the criteria to deliver a primary school, health facility and open space.	The site is considered suitable, available and achievable to deliver the required infrastructure.

Marsh Wall West	The site is well located in terms of proximity to transport, town centres and employment areas.	The site has multiple landowners with active employment/commercial uses which may impact deliverability. However comprehensive redevelopment would be encouraged to optimise the delivery of new homes and infrastructure.  Part of the site is subject to planning permission which secured a primary school alongside new homes.	The site is able to accommodate more than 500 new homes and will significantly make a contribution to meeting the boroughs housing target.  The site is considered viable.	The site meets the criteria to deliver a primary school, health facility and open space.	The site is considered suitable, available and achievable to deliver the required infrastructure.
Millharbour	The site is well located in terms of proximity to transport, town centres and employment areas.	The site has multiple landowners with active employment/commercial uses which may impact deliverability. However comprehensive redevelopment would be encouraged to optimise the delivery of new homes and infrastructure.	The site is able to accommodate more than 500 new homes and will significantly make a contribution to meeting the boroughs housing target.  The site is considered viable.	The site meets the criteria to deliver a primary school, health facility and open space.	The site is considered suitable, available and achievable to deliver the required infrastructure.
Millharbour South	The site is well located in terms of proximity to transport, town centres and employment areas.	The site has multiple landowners with active employment/commercial uses which may impact deliverability. However, comprehensive redevelopment would be encouraged to optimise the delivery of new homes and infrastructure.  Part of the site is subject to planning permission which secured a primary school alongside new homes.	The site is able to accommodate more than 500 new homes and will significantly make a contribution to meeting the boroughs housing target.  There are potential site viability constraints.	The site meets the criteria to deliver a primary school, health facility and open space.	There are potential achievability constraints due to site specific issues.  The site is considered suitable and available which on balance with other policy considerations could deliver the required infrastructure.
North Quay	The site is well located in terms of proximity to transport, town centres and employment areas. The Preferred Office Location boundary has been revised which provides greater flexibility in terms of land use mix.  Given its proximity to Aspen Way, there is potential air quality issue; however this can be mitigated through design and green infrastructure measures.	The site is in single ownership, vacant and is subject to a live planning application.	The site is able to accommodate up to 500 new homes and will significantly make a contribution to meeting the boroughs housing target. Given the employment designation, the site will so make a significant contribution to meeting the boroughs employment target.  The site is considered viable.	The site meets the criteria to deliver open space.	The site is considered suitable, available and achievable to deliver the required infrastructure.
Oban Street	The site provides the size and type of good quality medium sized well maintained industrial units that are in short supply in the borough and has been safeguarded as a Local Industrial Location (LIL) (Blackwall Trading Estate) in the Employment Land Review . The LIL requires the re-provision of industrial floorspace as part of redevelopment. The site has a significant amount of industrial floorspace and its re-provision would be in the form of an employment-led redevelopment. The amount of developable land to support the re-provision of existing employment floorspace, together with 500 new homes and an open space is not sufficient to support this level of development.	Part of the site is in public ownership with active industrial/employment use. The majority of the site comprises Blackwall Trading Estate with active light industrial activity. However, comprehensive redevelopment would be encouraged to optimise the delivery of new homes and infrastructure.	Initial viability scoping concluded the site to be unviable with the re-provision of existing industrial floorspace, 400 new homes and open space.	Given its employment designation and viability constraints the site is not suitable for infrastructure.	The site is considered unsuitable, unavailable and unachievable with the unlikely prospects to deliver the required infrastructure.  Site to be excluded.

Reuters Ltd	The site is well located in terms of proximity to transport, town centres and employment areas. The A13 runs along north of the site which impacts on the air quality. There is a listed warehouse on the southern side of the site.	Part of the site has an active employment use which comprising two data centres, one of which has been recently built. The remainder of the site is largely vacant and in single landownership.	The site is able to accommodate more than 500 new homes and will significantly make a contribution to meeting the boroughs housing target.	The site meets the criteria to deliver a primary school and open space.	The site is considered suitable, available and achievable to deliver the required infrastructure.
Riverside South	The site is well located in terms of proximity to transport, town centres and employment areas. The Preferred Office Location boundary has been revised which provides greater flexibility in terms of land use mix.	The site is in single ownership, vacant and is subject to an extant planning permission.	The site is able to accommodate up to 500 new homes and will significantly make a contribution to meeting the boroughs housing target. Given the employment designation, the site will so make a significant contribution to meeting the boroughs employment target.	The site meets the criteria to deliver open space.	The site is considered suitable, available and achievable to deliver the required infrastructure.
The Docklands Delivery Office	The site is well located in terms of proximity to transport, town centres and employment areas.	The site has an active employment use on site.	The site has the potential to accommodate 150 homes with ground floor commercial uses. Initial viability scoping concluded the site to be unviable with the provision of 150 new homes and 0.4 hectares of open space.	The site meets the criteria to deliver open space.	There are potential achievability constraints due to site specific issues.  The site is considered suitable and available for development. However, on balance the site is not considered a strategic site to deliver 500 new homes alongside the required infrastructure.  Site to be excluded.
The Highway	The site is well located in terms of proximity to transport, town centres and employment areas. The Highway runs along north of the site which impacts on the air quality.	The site can potentially accommodate approximately 500 new homes, with ground floor commercial uses fronting the Highway. However, the site is fragmented and in multiple land ownership, which will significantly affect the deliverability.	The site is able to accommodate more than 500 new homes and will significantly make a contribution to meeting the boroughs housing target.	The site does not fall within an area of open deficiency and no longer meets the criteria to be shortlisted. Evidence updated as part of the Open Space Strategy.	There are potential availability constraints due fragmented ownership.  On balance the site is not considered a strategic site as it is not required to delivery infrastructure.  Site to be excluded.
Westferry Printworks	The site is well located in terms of proximity to transport, town centres and employment areas.	The site previously accommodated a large-scale print works building and is currently subject to a planning permission which is under construction to provide new homes, employment, retail, leisure and community uses, together with a secondary school and open space.	The site is able to accommodate more than 500 new homes and will significantly make a contribution to meeting the boroughs housing target.	The site meets the criteria and is required to deliver a secondary school and open space as part of the planning permission	The site is considered suitable, available and achievable to deliver the required infrastructure.

Whitechapel South	<p>The site is well located in terms of proximity to transport, town centres and employment areas. Whitechapel High Street runs along north of the site which impacts on the air quality.</p> <p>The site comprises the listed former Royal London Hospital which is now vacant. There are also a number of heritage assets and views which will inform the scale of development.</p>	<p>The site comprises institutional and medical uses, mix of residential (private, affordable and specialist), office, commercial and light industrial.</p> <p>The site has multiple landowners with active commercial and residential uses on site which may impact of site deliverability. However comprehensive redevelopment will be encouraged to optimise the delivery of new jobs, homes, education facilities alongside infrastructure.</p>	<p>The site is able to accommodate up to 500 new homes and will significantly make a contribution to meeting the boroughs housing target. Given the employment designation, the site will so make a significant contribution to meeting the boroughs employment target.</p> <p>The site is considered viable.</p>	<p>The site meets the criteria to deliver open space and the re-provision/expansion of a health facility.</p>	<p>The site is considered suitable, available and achievable to deliver the required infrastructure.</p>
Wood Wharf	<p>The site is well located in terms of proximity to transport, town centres and employment areas.</p>	<p>The site previously accommodated employment and industrial uses and is currently subject to a planning permission which is under construction to provide new homes, employment, retail, leisure and community uses, together with a primary school and open space.</p>	<p>The site is able to accommodate more than 500 new homes and will significantly make a contribution to meeting the boroughs housing target.</p>	<p>The site meets the criteria and is required to deliver a primary school, Idea Store, health facility and open space as part of the planning permission</p>	<p>The site is considered suitable, available and achievable to deliver the required infrastructure.</p>

## Appendix 6: Viability Assessment

Site allocation	Proposed to test?	Reason for not testing	Residential capacity (Units)	Commercial capacity (Square metres GIA)	Basis of capacity proposed	Infrastructure allocated
Ailsa Street	No	Multiple sites with limited infrastructure burdens - school located on council owned site.	N/A	N/A	N/A	Primary school Small open space
Aspen Way	No	Transport for London owned sites, difficult to establish cost burdens.	N/A	N/A	N/A	Strategic open space
Billingsgate Market	Yes	N/A	1716	Office: 186,330 square Metres	Residential: London Plan Density matrix after accounting for infrastructure requirements. Commercial: Accounting for existing market floor area and one office tower block equivalent to adjacent sites.	Secondary school Small open space
Bishopsgate Goods Yard	Yes	N/A	1050	Office: 92,000 square metres Retail: 20,000 square metres	Based on planning application assuming a general reduction in height and accounting for infrastructure requirements.	Strategic open space Local presence/community facility: Idea Store/library/archives facility Leisure facility
Bow Common Gas Works	Yes	N/A	468	N/A	London Plan Density matrix after accounting for infrastructure requirements.	Secondary school Strategic open space
Chrisp Street Town Centre	No	Town centre and estate regeneration scheme, limited infrastructure cost burdens.	N/A	N/A	N/A	Idea Store (re-provision)
Crossharbour Town Centre	Yes	N/A	1661	Retail: 15,000 square metres	London Plan Density matrix after accounting for infrastructure requirements and existing size of supermarket on site.	Primary school Local presence/community facility Health facility
Leven Road Gas Works	Yes	N/A	1465		London Plan Density matrix after accounting for infrastructure requirements.	Secondary school Strategic open space
Limeharbour	Yes - Tested skylines site	N/A	676	N/A	London Plan Density matrix after accounting for infrastructure requirements.	Primary school (tested) Strategic open space
London Dock	No	Planning permission being implemented.	N/A	N/A	N/A	Secondary school Small open space Health facility
Marian Place Gas Works and The Oval	Yes	N/A	630	N/A	London Plan Density matrix after accounting for infrastructure requirements.	Strategic open space
Marsh Wall East	Yes - Tested Thames key site	N/A	780	N/A	London Plan Density matrix after accounting for infrastructure requirements.	Primary school (tested) Health facility Small open space
Marsh Wall West	Yes - Tested 50 Marsh Wall	N/A	650	N/A	Based on planning permission.	Primary school (tested) Health facility (tested) Small open space
Millharbour	Yes - Tested Mastmaker/Lightermans Road site	N/A	360		London Plan Density matrix after accounting for infrastructure requirements.	Primary school Health facility (tested) Small open space

Millharbour South	Yes - Tested 5, 6, 7, 8 Greenwich View Place	N/A	437	N/A	London Plan Density Matrix after accounting for infrastructure requirements.	Primary school (tested) Health facility Small open space
North Quay	Yes	N/A	772	Office: 200,00 square metres  Retail: 25,000 square metres	Based on previous planning permission and the policy requirements of developments within the Secondary Preferred Office Location	Small open space
Reuters Ltd	Yes	N/A	446	N/A	London Plan Density Matrix after accounting for infrastructure requirements.	Primary school (tested) Small open space
Riverside South	No	Limited infrastructure cost burdens and testing another employment led site.	N/A	N/A	N/A	Small open space
Westferry Printworks	No	Planning permission being implemented.	N/A	N/A	N/A	Secondary school Strategic open space
Whitechapel South	Yes - Tested Raven Row site	N/A	564	Office: 3,505 square metres	Based on planning permission.	Strategic open space Health facility
Wood Wharf	No	Planning permission being implemented.	N/A	N/A	N/A	Primary school Idea Store Health facility Strategic open space