

Local Development Framework
London Borough of Newham



PPS25 Sequential Test

Proposed Submission Core Strategy

For further information please refer to the Council's website: www.newham.gov.uk

Alternatively, contact Spatial Planning and Regeneration Policy on 0208 430 2639

or email ldf@newham.gov.uk.

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1. Introduction

- 1.1 This document forms the sequential test relating to strategic sites allocated for development in the Core Strategy being prepared by London Borough of Newham. A Sustainability Appraisal (incorporating Strategic Environmental Assessment) has also been prepared for the Core Strategy. The strategic sites are set out in the Core Strategy Proposed Submission, which was published 2 February 2011. The Core Strategy Proposed Submission can be viewed on the Council's website at: www.newham.gov.uk/planning/planningpolicy.
- 1.4 These tests draw upon the Strategic Flood Risk Assessments (SFRA) compiled by the London Borough of Newham and follow the procedural arrangements for sequential tests set out in Planning Policy Statement 25 (PPS25).
- 1.4 Newham's SFRA was published June 2010 and is endorsed by the Environment Agency. The SFRA can be viewed on the Council's website.

2. The sequential test

- 2.1 The primary objective of PPS25 is the direct new development towards areas at the lowest probability of flooding given the risks presented by developing on vulnerable land. The intention is not to avoid development of land that is at higher risk of flooding, however the desired outcome is for less-vulnerable land uses to be located in these areas.
- 2.2 PPS25 sets out a sequential approach in order to achieve this. This requires that only if there are no reasonably available sites in Flood Zone 1 can development be located in Flood Zone 2 and then Flood Zone 3. Within each Flood Zone, new development should also be directed to sites at the lowest probability of flooding from all sources (as indicated by SFRA's prepared by London Borough of Newham).
- 2.3 Table D.2 of PPS25 classifies the flood risk vulnerability of land uses into five categories, as follows:
- **Essential Infrastructure**
Includes: essential transport infrastructure; essential utility infrastructure; wind turbines.
 - **Highly vulnerable**
Includes: police stations, fire stations and ambulance stations; emergency dispersal points; basement dwellings; caravans, mobile homes and park homes intended for permanent residential use; installations requiring hazardous substances consent.
 - **More vulnerable**
Includes: hospitals; residential institutions such as residential care homes, children's homes, social services homes, prisons and hostels; buildings used for dwelling houses, student halls of residence, drinking establishment, nightclubs and hotels; non-residential uses for health services, nurseries and educational establishments; landfill and sites used for waste management facilities for hazardous waste; sites used for holiday or short-let caravans and camping.

- **Less vulnerable**

Includes: police, ambulance and fire stations which are not required to be operational during flooding; buildings used for: shops; financial, professional and other services; restaurants and cafes; hot food takeaways; offices; general industry; storage and distribution; non-residential institutions not included in 'more vulnerable', and assembly and leisure; land and buildings used for agriculture and forestry; waste treatment; minerals working and processing; water treatment works; sewage treatment works.

- **Water-compatible development**

Includes: flood control infrastructure; water transmission infrastructure and pumping stations; sewage transmission infrastructure and pumping stations; sand and gravel workings; docks, marinas and wharves; navigation facilities; MOD defence installations; ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location; water-based recreation (excluding sleeping accommodation); lifeguard and coastguard stations; amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms; essential ancillary sleeping or residential accommodation for staff required by uses in this category

2.4 The Core Strategy Proposed Submission concerns several land uses, as classified by Table D.2. These land uses are classified 'more vulnerable' or lower.

2.5 PPS25 then sets out (in Table D.2) in which flood zones these land use classifications are acceptable, where they are not acceptable and where an exceptions test needs to be demonstrated. This appears in Box 1 below.

Box 1: PPS 25 Table D.3: Flood Risk Vulnerability and Flood Zone 'Compatibility'

Flood Risk Vulnerability classification (see Table D2)		Essential Infrastructure	Water compatible	Highly Vulnerable	More Vulnerable	Less Vulnerable
Flood Zone (see Table D.1)	Zone 1	✓	✓	✓	✓	✓
	Zone 2	✓	✓	Exception Test required	✓	✓
	Zone 3a	Exception Test required	✓	✗	Exception Test required	✓
	Zone 3b 'Functional Floodplain'	Exception Test required	✓	✗	✗	✗

Key:
 ✓ Development is appropriate
 ✗ Development should not be permitted

2.6 The sequential tests of the 29 sites included in the Core Strategy Proposed Submission are set out in Appendix 1 of this report. A map showing the boundaries

of these sites can be found in the Core Strategy Proposed Submission, available on the Council's website at: <http://www.newham.gov.uk/planning/planningpolicy>

3. Site selection methodology

- 3.1 The strategic sites included in the Core Strategy Proposed Submission were identified through a site selection process. Planning Policy Statement 12: Local Spatial Planning (paragraphs 4.6, 4.7 and 4.11) provide some identification criteria for the inclusion of Strategic Sites in Core Strategies:
- Sites should be central to the achievement of the Core Strategy
 - Include schemes where investment requires a long lead in time
 - Include schemes with a reasonable prospect of delivery within plan timescale
- 3.2 In addition, guidance on the level of detail is provided:
- Broad locations for Strategic Sites should be included on the Key Diagram
 - Sites can be delineated in outline with site specific criteria to allow more precise definition through masterplanning (Area Action Plans or Supplementary Planning Documents)
- 3.3 The Core Strategy strategic sites are considered central to achieving the spatial vision and spatial and core policies; specifically, they will enable the delivery of the 37,500 new homes and 50,000 new jobs in Newham to 2027.
- 3.4 The strategic sites include those in Urban Newham, which is predominantly located in Flood Zone 1, and those in Flood Zone 2 and Flood Zone 3, which is predominantly in the 'Arc of Opportunity'. The Core Strategy will not be able to deliver its spatial vision and spatial and core policies in areas of low flood risk alone and the regeneration of brownfield sites is central to realising Core Strategy and London Plan objectives.
- 3.5 The strategic sites will redevelop previously developed land. Newham is a long established London borough with regeneration planned within existing urban areas and surplus or disused former industrial lands. There are open space and biodiversity deficiencies in many parts of the Borough; as such there are no greenfield sites available for any form of built development.
- 3.6 Almost all sites in the low and medium residual risk category are developed, safeguarded for open space or have long-standing planning permission for future development. There are few 'opportunity' sites providing alternative locations for major developments in these zones, however the Core Strategy Proposed Submission does include a number of strategic sites in Flood Zone 1 and Flood Zone 2.
- 3.7 On the basis of this site selection methodology above, it is considered that the strategic sites included in the Core Strategy Proposed Submission satisfy the sequential and exceptions tests.

4. Managing flood risk

- 4.1 This assessment concludes that the Core Strategy Proposed Submission passes the sequential test given, taking in to consideration the site selection methodology set out in Chapter 3 of this document. However, development proposals on these sites will be dependent on the implementation of national, regional and local policy on flood risk.

Regional policy

- 4.2 The London Plan (Policy 4A.13) expects development proposals to respond to flood risk and incorporate flood resistant design, in accordance with SFRA and PPS25. In addition, developments are expected to incorporate sustainable drainage systems (Policy 4A.14) and a hierarchy for surface water management is set out.

Local policy

- 4.3 At the local level, flood risk policy will be set out in the Core Strategy and in subsequent Local Development Documents (LDDs). The Core Strategy Proposed Submission includes a policy on flood risk (Policy SC3) which is set out in Box 2 below.

Box 2: Core Strategy Proposed Submission - Policy SC3: Flood risk

Objective

Development must be shown to be flood resistant and regeneration should improve the resilience of those parts of the Borough at risk from flooding.

Policy

The Strategic Flood Risk Assessment will inform spatial planning and development management decisions and flood risk (caused by tidal, fluvial, surface-water, sewer and groundwater flooding) will be reduced by the following measures:

1. Applying the sequential and exceptions requirements of PPS25 to avoid development that is not appropriate.
2. Developing flood risk assessments in line with advice from, and in conjunction with the environment agency.
3. Incorporating sustainable urban drainage systems in all major developments in conjunction with policy SC1, and adopting a presumption against hard-standing of domestic gardens and public open space.
4. Working with partners to identify critical drainage areas susceptible to surface water flooding, and develop measures to manage, and where possible, reduce the risk of surface water flooding.
5. Working with partners to maintain existing flood defences, and improving the Borough's flood resistance by supporting infrastructure improvements set out in the Strategic Flood Risk Assessment.
6. Encouraging the local community in flood risk areas to take up opportunities to improve resilience and resistance of existing homes and buildings.

Sequential test of planning applications

- 4.4 Development management decisions should have regard to the Strategic Flood Risk Assessment developed by each of the ELWA boroughs. These include recommendations for flood resistance and flood resilience and set out how flood risk should be incorporated in to design responses. The SFRAs will form the basis of sequential tests at the development management stage.

Appendix 1 Sequential test of the strategic sites

This appendix provides an assessment of the strategic sites against the sequential and exceptions tests. Each of the strategic sites presented in the Core Strategy Proposed Submission is assessed in line with the requirements set out in PPS25.

S01	Stratford Village
S02	Stratford Waterfront
S03	Olympic Quarter
S04	Chobham Village
S05	Stratford Central
S06	Carpenters District
S07	Sugar House Lane and Three Mills
S08	Thames Wharf
S09	Pudding Mill Lane
S10	Abbey Mills
S11	Parcelforce
S13	Manor Road
S14	Canning Town Central
S15	Canning Town East
S16	Silvertown Way East
S17	Silvertown Way West
S18	Limmo
S19	Gallions
S20	IVAX
S21	Silvertown Quays
S22	Minoco Wharf
S24	Woodgrange Road West
S25	East Ham Market
S26	East Ham Town Hall Campus
S27	Queens Market
S28	Custom House / Freemasons
S29	North Plaistow
S30	Royal Victoria West
S31	Royal Albert North

Appendix 1: Sequential test of strategic sites	
S1 Stratford North	
Proposal for site	Low density high family residential neighbourhood including supporting community and retail uses.
Flood Zone	SFRA identifies the site as being predominantly within Flood Zone 2, however small parts of the site are within Flood Zone 3.
PPS25 vulnerability of proposed land use	More vulnerable (or lower)
Reasonable alternative site/s available in same or lower flood zone?	No – a number of strategic sites included in the Proposed Submission Core Strategy are in Flood Zones 1 and 2, however almost all locations in the low and medium residual risk category are developed, safeguarded for open space or have long-standing planning permission for future development. There are no 'opportunity' sites providing alternative locations for major developments in these zones and regeneration of sites in Flood Zone 3 is central to achieving the spatial strategy.
Exceptions test	
a) it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by an SFRA and the Core Strategy's Sustainability Appraisal	Regeneration of this brownfield site will provide wider sustainability benefits to the community that outweigh the risk of flooding. Inclusion of this strategic site in the Core Strategy is considered central to achieving the spatial vision and housing and regeneration aspirations set out in the London Plan. In addition, the Sustainability Appraisal prepared for the Proposed Submission Core Strategy has assessed this strategic site against the sustainability framework and concludes that regeneration is likely to have a positive impact on the baseline (depending on mitigation and implementation of other Core Strategy policies).
b) the development should be on developable previously-developed land	The development is located on previously developed land.
c) Flood Risk Assessment must demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall	Development proposals will require the preparation of a Flood Risk Assessment and if possible, development should be directed to part of site with lower residual risk of flooding. Planning applications should draw on the SFRA, PPS25 (and Practice Guide) and Core Strategy Policies SC1 and SC3, and it will be expected sustainable urban drainage systems are incorporated in design responses.
Summary	
<p>Most of this site is located in Flood Zone 2; as such, the exceptions test would only be required if 'highly vulnerable' development is proposed in Flood Zone 2. However, as the site includes small areas in Flood Zone 3, the exceptions test has been applied.</p> <p>This assessment concludes that this site passes the sequential / exceptions test - subject to 'more vulnerable' development being directed to Flood Zone 2, appropriate design, further breach assessment and surface water management strategy.</p>	

Appendix 1: Sequential test of strategic sites	
S2 Stratford Waterfront	
Proposal for site	Mix of high density residential, offices, and ground floor community facilities, leisure, and bars, cafes and hotels.
Flood Zone	SFRA identifies the site as being predominantly within Flood Zone 3.
PPS25 vulnerability of proposed land use	More vulnerable (or lower)
Reasonable alternative site/s available in same or lower flood zone?	No – a number of strategic sites included in the Proposed Submission Core Strategy are in Flood Zones 1 and 2, however almost all locations in the low and medium residual risk category are developed, safeguarded for open space or have long-standing planning permission for future development. There are no 'opportunity' sites providing alternative locations for major developments in these zones and regeneration of sites in Flood Zone 3 is central to achieving the spatial strategy.
Exceptions test	
a) it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by an SFRA and the Core Strategy's Sustainability Appraisal.	Regeneration of this brownfield site will provide wider sustainability benefits to the community that outweigh the risk of flooding. Inclusion of this strategic site in the Core Strategy is considered central to achieving the spatial vision and housing and regeneration aspirations set out in the London Plan. In addition, the Sustainability Appraisal prepared for the Proposed Submission Core Strategy has assessed this strategic site against the sustainability framework and concludes that regeneration is likely to have a positive impact on the baseline (depending on mitigation and implementation of other Core Strategy policies).
b) the development should be on developable previously-developed land	The development is located on previously developed land.
c) Flood Risk Assessment must demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.	Development proposals will require the preparation of a Flood Risk Assessment and if possible, development should be directed to part of site with lower residual risk of flooding. Planning applications should draw on the SFRA, PPS25 (and Practice Guide) and Core Strategy Policies SC1 and SC3, and it will be expected sustainable urban drainage systems are incorporated in design responses.
Summary	
This assessment concludes that this site passes the sequential / exceptions test - subject to appropriate design, further breach assessment and surface water management strategy.	

S3 Olympic Quarter

Proposal for site	Site includes the Olympic Stadium and adjacent sites – mixed uses proposes, including employment and medium density housing.
Flood Zone	SFRA identifies the site as being predominantly in Flood Zone 1, however the site abuts areas of Flood Zones 2 and 3.
PPS25 vulnerability of proposed land use	More vulnerable (or lower)
Reasonable alternative site/s available in same or lower flood zone?	Not applicable – most of this site is located in Flood Zone 1.

Exceptions test

a) it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by an SFRA and the Core Strategy's Sustainability Appraisal.	Regeneration of this brownfield site will provide wider sustainability benefits to the community that outweigh the risk of flooding. Inclusion of this strategic site in the Core Strategy is considered central to achieving the spatial vision and housing and regeneration aspirations set out in the London Plan. In addition, the Sustainability Appraisal prepared for the Proposed Submission Core Strategy has assessed this strategic site against the sustainability framework and concludes that regeneration is likely to have a positive impact on the baseline (depending on mitigation and implementation of other Core Strategy policies).
b) the development should be on developable previously-developed land	The development is located on previously developed land.
c) Flood Risk Assessment must demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.	Development proposals will require the preparation of a Flood Risk Assessment and if possible, development should be directed to part of site with lower residual risk of flooding. Planning applications should draw on the SFRA, PPS25 (and Practice Guide) and Core Strategy Policies SC1 and SC3, and it will be expected sustainable urban drainage systems are incorporated in design responses.

Summary

Most of this site is located in Flood Zone 1; as such, the exceptions test would only be required where 'highly vulnerable' development is proposed in Flood Zone 2 or where 'more vulnerable' development is proposed in Flood Zone 3. However, as the site includes small areas in Flood Zone 3 and Flood Zone 3, the exceptions test has been applied.

This assessment concludes that this site passes the sequential / exceptions test - subject to 'more vulnerable' development being directed to Flood Zone 1 or 2, appropriate design, further breach assessment and surface water management strategy.

S4 Chobham Village

Proposal for site	Residential neighbourhood with an emphasis on family housing, but with higher densities near the station, including new urban park.
Flood Zone	SFRA identifies the site as being predominantly in Flood Zone 1, however parts of the site are located within Flood Zone 2.
PPS25 vulnerability of proposed land use	More vulnerable (or lower)
Reasonable alternative site/s available in same or lower flood zone?	Not applicable – most of this site is located in Flood Zone 1.

Exceptions test

Exceptions test only required if 'highly vulnerable' development is proposed in Flood Zone 2; this is not proposed by this strategic site allocation.

Summary

Strategic site passes the sequential test.

Appendix 1: Sequential test of strategic sites	
S5 Stratford Central	
Proposal for site	Renewal and expansion of retail floor space, medium/high density residential and public realm improvements.
Flood Zone	SFRA identifies the site as being predominantly within Flood Zone 3.
PPS25 vulnerability of proposed land use	More vulnerable (or lower)
Reasonable alternative site/s available in same or lower flood zone?	No – a number of strategic sites included in the Proposed Submission Core Strategy are in Flood Zones 1 and 2, however almost all locations in the low and medium residual risk category are developed, safeguarded for open space or have long-standing planning permission for future development. There are no 'opportunity' sites providing alternative locations for major developments in these zones and regeneration of sites in Flood Zone 3 is central to achieving the spatial strategy.
Exceptions test	
a) it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by an SFRA and the Core Strategy's Sustainability Appraisal.	Regeneration of this brownfield site will provide wider sustainability benefits to the community that outweigh the risk of flooding. Inclusion of this strategic site in the Core Strategy is considered central to achieving the spatial vision and housing and regeneration aspirations set out in the London Plan. In addition, the Sustainability Appraisal prepared for the Proposed Submission Core Strategy has assessed this strategic site against the sustainability framework and concludes that regeneration is likely to have a positive impact on the baseline (depending on mitigation and implementation of other Core Strategy policies).
b) the development should be on developable previously-developed land	The development is located on previously developed land.
c) Flood Risk Assessment must demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.	Development proposals will require the preparation of a Flood Risk Assessment and if possible, development should be directed to part of site with lower residual risk of flooding. Planning applications should draw on the SFRA, PPS25 (and Practice Guide) and Core Strategy Policies SC1 and SC3, and it will be expected sustainable urban drainage systems are incorporated in design responses.
Summary	
SFRA and this assessment conclude that this site passes the sequential / exceptions test - subject to appropriate design, further breach assessment and surface water management strategy.	

Appendix 1: Sequential test of strategic sites	
S6 Carpenters District	
Proposal for site	Extensive redevelopment to create a more mixed-use area across Carpenters including more extensive business/commercial uses, education and community uses alongside better quality housing.
Flood Zone	SFRA identifies the site as being predominantly within Flood Zone 3.
PPS25 vulnerability of proposed land use	More vulnerable (or lower)
Reasonable alternative site/s available in same or lower flood zone?	No – a number of strategic sites included in the Proposed Submission Core Strategy are in Flood Zones 1 and 2, however almost all locations in the low and medium residual risk category are developed, safeguarded for open space or have long-standing planning permission for future development. There are no 'opportunity' sites providing alternative locations for major developments in these zones and regeneration of sites in Flood Zone 3 is central to achieving the spatial strategy.
Exceptions test	
a) it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by an SFRA and the Core Strategy's Sustainability Appraisal.	Regeneration of this brownfield site will provide wider sustainability benefits to the community that outweigh the risk of flooding. Inclusion of this strategic site in the Core Strategy is considered central to achieving the spatial vision and housing and regeneration aspirations set out in the London Plan. In addition, the Sustainability Appraisal prepared for the Proposed Submission Core Strategy has assessed this strategic site against the sustainability framework and concludes that regeneration is likely to have a positive impact on the baseline (depending on mitigation and implementation of other Core Strategy policies).
b) the development should be on developable previously-developed land	The development is located on previously developed land.
c) Flood Risk Assessment must demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.	Development proposals will require the preparation of a Flood Risk Assessment and if possible, development should be directed to part of site with lower residual risk of flooding. Planning applications should draw on the SFRA, PPS25 (and Practice Guide) and Core Strategy Policies SC1 and SC3, and it will be expected sustainable urban drainage systems are incorporated in design responses.
Summary	
This assessment concludes that this site passes the sequential / exceptions test - subject to appropriate design, further breach assessment and surface water management strategy.	

S7 Sugar House Lane and Three Mills

Proposal for site	Mixed use to include creative and cultural employment uses, low density family led residential development, community uses, supporting services and local amenity space. Cultural and creative industries are to be retained at Three Mills.
Flood Zone	SFRA identifies the site as being within Flood Zone 3.
PPS25 vulnerability of proposed land use	More vulnerable (or lower)
Reasonable alternative site/s available in same or lower flood zone?	No – a number of strategic sites included in the Proposed Submission Core Strategy are in Flood Zones 1 and 2, however almost all locations in the low and medium residual risk category are developed, safeguarded for open space or have long-standing planning permission for future development. There are no 'opportunity' sites providing alternative locations for major developments in these zones and regeneration of sites in Flood Zone 3 is central to achieving the spatial strategy.
Exceptions test	
a) it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by an SFRA and the Core Strategy's Sustainability Appraisal.	Regeneration of this brownfield site will provide wider sustainability benefits to the community that outweigh the risk of flooding. Inclusion of this strategic site in the Core Strategy is considered central to achieving the spatial vision and housing and regeneration aspirations set out in the London Plan. In addition, the Sustainability Appraisal prepared for the Proposed Submission Core Strategy has assessed this strategic site against the sustainability framework and concludes that regeneration is likely to have a positive impact on the baseline (depending on mitigation and implementation of other Core Strategy policies).
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c) Flood Risk Assessment must demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.	Development proposals will require the preparation of a Flood Risk Assessment and if possible, development should be directed to part of site with lower residual risk of flooding. Planning applications should draw on the SFRA, PPS25 (and Practice Guide) and Core Strategy Policies SC1 and SC3, and it will be expected sustainable urban drainage systems are incorporated in design responses.
Summary	
This assessment concludes that this site passes the sequential / exceptions test - subject to appropriate design, further breach assessment and surface water management strategy.	

Appendix 1: Sequential test of strategic sites	
S8 Thames Wharf	
Proposal for site	Proposed release from Strategic Industrial Location and new employment, leisure and residential uses grouped around a new DLR station.
Flood Zone	SFRA identifies the site as being predominantly within Flood Zone 3.
PPS25 vulnerability of proposed land use	More vulnerable (or lower)
Reasonable alternative site/s available in same or lower flood zone?	No – a number of strategic sites included in the Proposed Submission Core Strategy are in Flood Zones 1 and 2, however almost all locations in the low and medium residual risk category are developed, safeguarded for open space or have long-standing planning permission for future development. There are no 'opportunity' sites providing alternative locations for major developments in these zones and regeneration of sites in Flood Zone 3 is central to achieving the spatial strategy.
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Summary	
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S9 Pudding Mill Lane

Proposal for site	De-designation from Strategic Industrial Location for mixed used development comprising employment uses and low density high family residential, with a new local centre focussed around Pudding Mill Lane DLR station.
Flood Zone	SFRA identifies the site as being predominantly within Flood Zone 3.
PPS25 vulnerability of proposed land use	More vulnerable (or lower)
Reasonable alternative site/s available in same or lower flood zone?	No – a number of strategic sites included in the Proposed Submission Core Strategy are in Flood Zones 1 and 2, however almost all locations in the low and medium residual risk category are developed, safeguarded for open space or have long-standing planning permission for future development. There are no 'opportunity' sites providing alternative locations for major developments in these zones and regeneration of sites in Flood Zone 3 is central to achieving the spatial strategy.

Exceptions test

a) it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by an SFRA and the Core Strategy's Sustainability Appraisal.	Regeneration of this brownfield site will provide wider sustainability benefits to the community that outweigh the risk of flooding. Inclusion of this strategic site in the Core Strategy is considered central to achieving the spatial vision and housing and regeneration aspirations set out in the London Plan. In addition, the Sustainability Appraisal prepared for the Proposed Submission Core Strategy has assessed this strategic site against the sustainability framework and concludes that regeneration is likely to have a positive impact on the baseline (depending on mitigation and implementation of other Core Strategy policies).
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Summary

This assessment concludes that this site passes the sequential / exceptions test - subject to appropriate design, further breach assessment and surface water management strategy.

S10 Abbey Mills

Proposal for site	Mix of residential and employment uses.
Flood Zone	SFRA identifies the site as being within Flood Zone 3.
PPS25 vulnerability of proposed land use	More vulnerable (or lower)
Reasonable alternative site/s available in same or lower flood zone?	No – a number of strategic sites included in the Proposed Submission Core Strategy are in Flood Zones 1 and 2, however almost all locations in the low and medium residual risk category are developed, safeguarded for open space or have long-standing planning permission for future development. There are no 'opportunity' sites providing alternative locations for major developments in these zones and regeneration of sites in Flood Zone 3 is central to achieving the spatial strategy.

Exceptions test

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Summary

SFRA and this assessment conclude that this site passes the sequential / exceptions test - subject to appropriate design, further breach assessment and surface water management strategy.

S11 Parcelforce

Proposal for site	Site within Canning Town and Custom House Community Forum Area will have a close relationship with other development around West Ham station – in particular S10 Abbey Mills.
Flood Zone	SFRA identifies the site as being within Flood Zone 3.
PPS25 vulnerability of proposed land use	More vulnerable (or lower)
Reasonable alternative site/s available in same or lower flood zone?	No – a number of strategic sites included in the Proposed Submission Core Strategy are in Flood Zones 1 and 2, however almost all locations in the low and medium residual risk category are developed, safeguarded for open space or have long-standing planning permission for future development. There are no 'opportunity' sites providing alternative locations for major developments in these zones and regeneration of sites in Flood Zone 3 is central to achieving the spatial strategy.

Exceptions test

a) it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by an SFRA and the Core Strategy's Sustainability Appraisal.	Regeneration of this brownfield site will provide wider sustainability benefits to the community that outweigh the risk of flooding. Inclusion of this strategic site in the Core Strategy is considered central to achieving the spatial vision and housing and regeneration aspirations set out in the London Plan. In addition, the Sustainability Appraisal prepared for the Proposed Submission Core Strategy has assessed this strategic site against the sustainability framework and concludes that regeneration is likely to have a positive impact on the baseline (depending on mitigation and implementation of other Core Strategy policies).
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Summary

This assessment concludes that this site passes the sequential / exceptions test - subject to appropriate design, further breach assessment and surface water management strategy.

Appendix 1: Sequential test of strategic sites

S13 Manor Road

Proposal for site	Residential-led mixed use scheme incorporating open space of 0.71 ha with green grid links to Star Park; commercial frontage (including B1) to Barking Road and business use alongside railway.
Flood Zone	SFRA identifies the site as being within Flood Zone 3.
PPS25 vulnerability of proposed land use	More vulnerable (or lower)
Reasonable alternative site/s available in same or lower flood zone?	No – a number of strategic sites included in the Proposed Submission Core Strategy are in Flood Zones 1 and 2, however almost all locations in the low and medium residual risk category are developed, safeguarded for open space or have long-standing planning permission for future development. There are no 'opportunity' sites providing alternative locations for major developments in these zones and regeneration of sites in Flood Zone 3 is central to achieving the spatial strategy.

Exceptions test

a) it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by an SFRA and the Core Strategy's Sustainability Appraisal.	Regeneration of this brownfield site will provide wider sustainability benefits to the community that outweigh the risk of flooding. Inclusion of this strategic site in the Core Strategy is considered central to achieving the spatial vision and housing and regeneration aspirations set out in the London Plan. In addition, the Sustainability Appraisal prepared for the Proposed Submission Core Strategy has assessed this strategic site against the sustainability framework and concludes that regeneration is likely to have a positive impact on the baseline (depending on mitigation and implementation of other Core Strategy policies).
b) the development should be on developable previously-developed land	The development is located on previously developed land.
c) Flood Risk Assessment must demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.	Development proposals will require the preparation of a Flood Risk Assessment and if possible, development should be directed to part of site with lower residual risk of flooding. Planning applications should draw on the SFRA, PPS25 (and Practice Guide) and Core Strategy Policies SC1 and SC3, and it will be expected sustainable urban drainage systems are incorporated in design responses.

Summary

This assessment concludes that this site passes the sequential / exceptions test - subject to appropriate design, further breach assessment and surface water management strategy.

S14 Canning Town Central

Proposal for site	Expanded District Centre abutting re-designed road junction, moving towards a major centre in composition and scale, within revised boundary to comprise retail (to include anchor food store on site 7, and significant comparison floorspace, (leisure, civic space, residential, and community uses.
Flood Zone	SFRA identifies the site as being within Flood Zone 3.
PPS25 vulnerability of proposed land use	More vulnerable (or lower)
Reasonable alternative site/s available in same or lower flood zone?	No – a number of strategic sites included in the Proposed Submission Core Strategy are in Flood Zones 1 and 2, however almost all locations in the low and medium residual risk category are developed, safeguarded for open space or have long-standing planning permission for future development. There are no 'opportunity' sites providing alternative locations for major developments in these zones and regeneration of sites in Flood Zone 3 is central to achieving the spatial strategy.
Exceptions test	
a) it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by an SFRA and the Core Strategy's Sustainability Appraisal.	Regeneration of this brownfield site will provide wider sustainability benefits to the community that outweigh the risk of flooding. Inclusion of this strategic site in the Core Strategy is considered central to achieving the spatial vision and housing and regeneration aspirations set out in the London Plan. In addition, the Sustainability Appraisal prepared for the Proposed Submission Core Strategy has assessed this strategic site against the sustainability framework and concludes that regeneration is likely to have a positive impact on the baseline (depending on mitigation and implementation of other Core Strategy policies).
b) the development should be on developable previously-developed land	The development is located on previously developed land.
c) Flood Risk Assessment must demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.	Development proposals will require the preparation of a Flood Risk Assessment and if possible, development should be directed to part of site with lower residual risk of flooding. Planning applications should draw on the SFRA, PPS25 (and Practice Guide) and Core Strategy Policies SC1 and SC3, and it will be expected sustainable urban drainage systems are incorporated in design responses.
Summary	
SFRA and this assessment conclude that this site passes the sequential / exceptions test - subject to appropriate design and agreeing emergency access arrangements.	

S15 Canning Town East

Proposal for site	Residential with supporting community uses, notably a school to the west, and other multi-use facilities easily accessible from the town centre to the east, and green space of at least the existing quantum, linking to the residential street abutting the street to the south.
Flood Zone	SFRA identifies the site as being within Flood Zone 3.
PPS25 vulnerability of proposed land use	More vulnerable (or lower)
Reasonable alternative site/s available in same or lower flood zone?	No – a number of strategic sites included in the Proposed Submission Core Strategy are in Flood Zones 1 and 2, however almost all locations in the low and medium residual risk category are developed, safeguarded for open space or have long-standing planning permission for future development. There are no 'opportunity' sites providing alternative locations for major developments in these zones and regeneration of sites in Flood Zone 3 is central to achieving the spatial strategy.
Exceptions test	
a) it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by an SFRA and the Core Strategy's Sustainability Appraisal.	Regeneration of this brownfield site will provide wider sustainability benefits to the community that outweigh the risk of flooding. Inclusion of this strategic site in the Core Strategy is considered central to achieving the spatial vision and housing and regeneration aspirations set out in the London Plan. In addition, the Sustainability Appraisal prepared for the Proposed Submission Core Strategy has assessed this strategic site against the sustainability framework and concludes that regeneration is likely to have a positive impact on the baseline (depending on mitigation and implementation of other Core Strategy policies).
b) the development should be on developable previously-developed land	The development is located on previously developed land.
c) Flood Risk Assessment must demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.	Development proposals will require the preparation of a Flood Risk Assessment and if possible, development should be directed to part of site with lower residual risk of flooding. Planning applications should draw on the SFRA, PPS25 (and Practice Guide) and Core Strategy Policies SC1 and SC3, and it will be expected sustainable urban drainage systems are incorporated in design responses.
Summary	
This assessment concludes that this site passes the sequential / exceptions test - subject to appropriate design and agreeing emergency access arrangements. However, SFRA states that development for 'more vulnerable' uses on site is significantly restricted based on the current understanding of flood risk.	

S16 Silvertown Way East

Proposal for site	Mixed use comprising residential, business use fronting Caxton Street North opposite existing units, and public open space within the urban structure making green grid connections to Keir Hardie recreation ground.
Flood Zone	SFRA identifies the site as being within Flood Zone 3.
PPS25 vulnerability of proposed land use	More vulnerable (or lower)
Reasonable alternative site/s available in same or lower flood zone?	No – a number of strategic sites included in the Proposed Submission Core Strategy are in Flood Zones 1 and 2, however almost all locations in the low and medium residual risk category are developed, safeguarded for open space or have long-standing planning permission for future development. There are no 'opportunity' sites providing alternative locations for major developments in these zones and regeneration of sites in Flood Zone 3 is central to achieving the spatial strategy.
Exceptions test	
a) it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by an SFRA and the Core Strategy's Sustainability Appraisal.	Regeneration of this brownfield site will provide wider sustainability benefits to the community that outweigh the risk of flooding. Inclusion of this strategic site in the Core Strategy is considered central to achieving the spatial vision and housing and regeneration aspirations set out in the London Plan. In addition, the Sustainability Appraisal prepared for the Proposed Submission Core Strategy has assessed this strategic site against the sustainability framework and concludes that regeneration is likely to have a positive impact on the baseline (depending on mitigation and implementation of other Core Strategy policies).
b) the development should be on developable previously-developed land	The development is located on previously developed land.
c) Flood Risk Assessment must demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.	Development proposals will require the preparation of a Flood Risk Assessment and if possible, development should be directed to part of site with lower residual risk of flooding. Planning applications should draw on the SFRA, PPS25 (and Practice Guide) and Core Strategy Policies SC1 and SC3, and it will be expected sustainable urban drainage systems are incorporated in design responses.
Summary	
This assessment concludes that this site passes the sequential / exceptions test - subject to appropriate design and agreeing emergency access arrangements.	

S17 Silvertown Way West

Proposal for site	Mixed use comprising residential and business, with commercial units and higher density residential facing the street within the town centre boundary, and business uses extending to face units under arches in Peto Street North (approx 25% of site area).
Flood Zone	SFRA identifies the site as being within Flood Zone 3.
PPS25 vulnerability of proposed land use	More vulnerable (or lower)
Reasonable alternative site/s available in same or lower flood zone?	No – a number of strategic sites included in the Proposed Submission Core Strategy are in Flood Zones 1 and 2, however almost all locations in the low and medium residual risk category are developed, safeguarded for open space or have long-standing planning permission for future development. There are no 'opportunity' sites providing alternative locations for major developments in these zones and regeneration of sites in Flood Zone 3 is central to achieving the spatial strategy.
Exceptions test	
a) it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by an SFRA and the Core Strategy's Sustainability Appraisal.	Regeneration of this brownfield site will provide wider sustainability benefits to the community that outweigh the risk of flooding. Inclusion of this strategic site in the Core Strategy is considered central to achieving the spatial vision and housing and regeneration aspirations set out in the London Plan. In addition, the Sustainability Appraisal prepared for the Proposed Submission Core Strategy has assessed this strategic site against the sustainability framework and concludes that regeneration is likely to have a positive impact on the baseline (depending on mitigation and implementation of other Core Strategy policies).
b) the development should be on developable previously-developed land	The development is located on previously developed land.
c) Flood Risk Assessment must demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.	Development proposals will require the preparation of a Flood Risk Assessment and if possible, development should be directed to part of site with lower residual risk of flooding. Planning applications should draw on the SFRA, PPS25 (and Practice Guide) and Core Strategy Policies SC1 and SC3, and it will be expected sustainable urban drainage systems are incorporated in design responses.
Summary	
This assessment concludes that this site passes the sequential / exceptions test - subject to appropriate design and agreeing emergency access arrangements.	

S18 Limmo

Proposal for site	Open space forming appropriate connections and terminus to Lea Valley Fat Walk, with enabling residential use should access and environmental constraints be overcome.
Flood Zone	SFRA identifies the site as being within predominantly in Flood Zone 1, however parts of the site are located within Flood Zone 2 and Flood Zone 3.
PPS25 vulnerability of proposed land use	More vulnerable (or lower)
Reasonable alternative site/s available in same or lower flood zone?	Not applicable – most of this site is located in Flood Zone 1.

Exceptions test

a) it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by an SFRA and the Core Strategy's Sustainability Appraisal.	Regeneration of this brownfield site will provide wider sustainability benefits to the community that outweigh the risk of flooding. Inclusion of this strategic site in the Core Strategy is considered central to achieving the spatial vision and housing and regeneration aspirations set out in the London Plan. In addition, the Sustainability Appraisal prepared for the Proposed Submission Core Strategy has assessed this strategic site against the sustainability framework and concludes that regeneration is likely to have a positive impact on the baseline (depending on mitigation and implementation of other Core Strategy policies).
b) the development should be on developable previously-developed land	The development is located on previously developed land.
c) Flood Risk Assessment must demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.	Development proposals will require the preparation of a Flood Risk Assessment and if possible, development should be directed to part of site with lower residual risk of flooding. Planning applications should draw on the SFRA, PPS25 (and Practice Guide) and Core Strategy Policies SC1 and SC3, and it will be expected sustainable urban drainage systems are incorporated in design responses.

Summary

Most of this site is located in Flood Zone 1; as such, the exceptions test would only be required where 'highly vulnerable' development is proposed in Flood Zone 2 or where 'more vulnerable' development is proposed in Flood Zone 3. However, as the site includes small areas in Flood Zone 2 and Flood Zone 3, the exceptions test has been applied.

The SFRA and this assessment conclude that this site passes the sequential / exceptions test - subject to 'more vulnerable' development being directed to Flood Zone 1 or 2, appropriate design, further breach assessment and surface water management strategy.

S19/S20 Albert Basin

Proposal for site	New housing around Albert Dock Basin will consolidate existing residential development, with a new local centre focused around Gallions Reach DLR station, providing day to day shopping, health, education and community uses. North of Armada Way new development will be employment led.
Flood Zone	SFRA identifies the site as being within Flood Zone 3.
PPS25 vulnerability of proposed land use	More vulnerable (or lower)
Reasonable alternative site/s available in same or lower flood zone?	No – a number of strategic sites included in the Proposed Submission Core Strategy are in Flood Zones 1 and 2, however almost all locations in the low and medium residual risk category are developed, safeguarded for open space or have long-standing planning permission for future development. There are no 'opportunity' sites providing alternative locations for major developments in these zones and regeneration of sites in Flood Zone 3 is central to achieving the spatial strategy.

Exceptions test

a) it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by an SFRA and the Core Strategy's Sustainability Appraisal.	Regeneration of this brownfield site will provide wider sustainability benefits to the community that outweigh the risk of flooding. Inclusion of this strategic site in the Core Strategy is considered central to achieving the spatial vision and housing and regeneration aspirations set out in the London Plan. In addition, the Sustainability Appraisal prepared for the Proposed Submission Core Strategy has assessed this strategic site against the sustainability framework and concludes that regeneration is likely to have a positive impact on the baseline (depending on mitigation and implementation of other Core Strategy policies).
b) the development should be on developable previously-developed land	The development is located on previously developed land.
c) Flood Risk Assessment must demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.	Development proposals will require the preparation of a Flood Risk Assessment and if possible, development should be directed to part of site with lower residual risk of flooding. Planning applications should draw on the SFRA, PPS25 (and Practice Guide) and Core Strategy Policies SC1 and SC3, and it will be expected sustainable urban drainage systems are incorporated in design responses.

Summary

SFRA and this assessment conclude that this site passes the sequential / exceptions test - subject to breach analysis, appropriate design and agreeing emergency access arrangements.

S21 Silvertown Quays

Proposal for site	A Local Entertainment District (LED) is to be focused around Silvertown Quays, with leisure and cultural uses, employment, local shopping and community uses focussed around North Woolwich Road, including use of space under DLR viaduct.
Flood Zone	SFRA identifies the site as being within Flood Zone 3.
PPS25 vulnerability of proposed land use	More vulnerable (or lower)
Reasonable alternative site/s available in same or lower flood zone?	No – a number of strategic sites included in the Proposed Submission Core Strategy are in Flood Zones 1 and 2, however almost all locations in the low and medium residual risk category are developed, safeguarded for open space or have long-standing planning permission for future development. There are no 'opportunity' sites providing alternative locations for major developments in these zones and regeneration of sites in Flood Zone 3 is central to achieving the spatial strategy.

Exceptions test

a) it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by an SFRA and the Core Strategy's Sustainability Appraisal.	Regeneration of this brownfield site will provide wider sustainability benefits to the community that outweigh the risk of flooding. Inclusion of this strategic site in the Core Strategy is considered central to achieving the spatial vision and housing and regeneration aspirations set out in the London Plan. In addition, the Sustainability Appraisal prepared for the Proposed Submission Core Strategy has assessed this strategic site against the sustainability framework and concludes that regeneration is likely to have a positive impact on the baseline (depending on mitigation and implementation of other Core Strategy policies).
b) the development should be on developable previously-developed land	The development is located on previously developed land.
c) Flood Risk Assessment must demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.	Development proposals will require the preparation of a Flood Risk Assessment and if possible, development should be directed to part of site with lower residual risk of flooding. Planning applications should draw on the SFRA, PPS25 (and Practice Guide) and Core Strategy Policies SC1 and SC3, and it will be expected sustainable urban drainage systems are incorporated in design responses.

Summary

SFRA and this assessment conclude that this site passes the sequential / exceptions test - subject to appropriate design and agreeing emergency access arrangements.

S22 Minoco Wharf

Proposal for site	Release of land designated as a Strategic Industrial Location (SIL) at Thameside West up to the eastern boundary of Lyle Park (18 hectares) to assist in the development of a new neighbourhood at West Silvertown. A new local centre should be located on North Woolwich Road between the DLR stations
Flood Zone	SFRA identifies the site as being within Flood Zone 3.
PPS25 vulnerability of proposed land use	More vulnerable (or lower)
Reasonable alternative site/s available in same or lower flood zone?	No – a number of strategic sites included in the Proposed Submission Core Strategy are in Flood Zones 1 and 2, however almost all locations in the low and medium residual risk category are developed, safeguarded for open space or have long-standing planning permission for future development. There are no 'opportunity' sites providing alternative locations for major developments in these zones and regeneration of sites in Flood Zone 3 is central to achieving the spatial strategy.
Exceptions test	
a) it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by an SFRA and the Core Strategy's Sustainability Appraisal.	Regeneration of this brownfield site will provide wider sustainability benefits to the community that outweigh the risk of flooding. Inclusion of this strategic site in the Core Strategy is considered central to achieving the spatial vision and housing and regeneration aspirations set out in the London Plan. In addition, the Sustainability Appraisal prepared for the Proposed Submission Core Strategy has assessed this strategic site against the sustainability framework and concludes that regeneration is likely to have a positive impact on the baseline (depending on mitigation and implementation of other Core Strategy policies).
b) the development should be on developable previously-developed land	The development is located on previously developed land.
c) Flood Risk Assessment must demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.	Development proposals will require the preparation of a Flood Risk Assessment and if possible, development should be directed to part of site with lower residual risk of flooding. Planning applications should draw on the SFRA, PPS25 (and Practice Guide) and Core Strategy Policies SC1 and SC3, and it will be expected sustainable urban drainage systems are incorporated in design responses.
Summary	
This assessment concludes that this site passes the sequential / exceptions test - subject to appropriate design and agreeing emergency access arrangements.	

S24 Woodgrange Road

Proposal for site	Mixed use comprising retail, residential, community and business; limited intensification to take advantage of opportunities afforded by Cross Rail
Flood Zone	SFRA identifies the site as being located in Flood Zone 1.
PPS25 vulnerability of proposed land use	More vulnerable (or lower)
Reasonable alternative site/s available in same or lower flood zone?	Not applicable – this site is located in Flood Zone 1.
Exceptions test	
The sequential test is passed – no exceptions test required.	
Summary	
Strategic site passes the sequential test.	

Appendix 1: Sequential test of strategic sites

S25 East Ham Market

Proposal for site	Mixed use including retail and residential.
Flood Zone	SFRA identifies the site as being located in Flood Zone 1.
PPS25 vulnerability of proposed land use	More vulnerable (or lower)
Reasonable alternative site/s available in same or lower flood zone?	Not applicable – this site is located in Flood Zone 1.
Exceptions test	
The sequential test is passed – no exceptions test required.	
Summary	
Strategic site passes the sequential test.	

Appendix 1: Sequential test of strategic sites

S26 Town Hall Campus

Proposal for site	Mixed use including retail and residential.
Flood Zone	SFRA identifies the site as being located in Flood Zone 1.
PPS25 vulnerability of proposed land use	More vulnerable (or lower)
Reasonable alternative site/s available in same or lower flood zone?	Not applicable – this site is located in Flood Zone 1.

Exceptions test

The sequential test is passed – no exceptions test required.

Summary

Strategic site passes the sequential test.

Appendix 1: Sequential test of strategic sites

S27 Queens Market

Proposal for site	Mixed use including retention of market, residential and community
Flood Zone	SFRA identifies the site as being located in Flood Zone 1.
PPS25 vulnerability of proposed land use	More vulnerable (or lower)
Reasonable alternative site/s available in same or lower flood zone?	Not applicable – this site is located in Flood Zone 1.

Exceptions test

The sequential test is passed – no exceptions test required.

Summary

Strategic site passes the sequential test.

S28 Custom House/Freemasons Road

Proposal for site	Intensified residential and more general commercial/business space, making use of Crossrail potential (station to be built over) which will form the nucleus of a renewed and expanded local centre.
Flood Zone	SFRA identifies the site as being predominantly within Flood Zone 3.
PPS25 vulnerability of proposed land use	More vulnerable (or lower)
Reasonable alternative site/s available in same or lower flood zone?	No – a number of strategic sites included in the Proposed Submission Core Strategy are in Flood Zones 1 and 2, however almost all locations in the low and medium residual risk category are developed, safeguarded for open space or have long-standing planning permission for future development. There are no 'opportunity' sites providing alternative locations for major developments in these zones and regeneration of sites in Flood Zone 3 is central to achieving the spatial strategy.

Exceptions test

a) it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by an SFRA and the Core Strategy's Sustainability Appraisal.	Regeneration of this brownfield site will provide wider sustainability benefits to the community that outweigh the risk of flooding. Inclusion of this strategic site in the Core Strategy is considered central to achieving the spatial vision and housing and regeneration aspirations set out in the London Plan. In addition, the Sustainability Appraisal prepared for the Proposed Submission Core Strategy has assessed this strategic site against the sustainability framework and concludes that regeneration is likely to have a positive impact on the baseline (depending on mitigation and implementation of other Core Strategy policies).
b) the development should be on developable previously-developed land	The development is located on previously developed land.
c) Flood Risk Assessment must demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.	Development proposals will require the preparation of a Flood Risk Assessment and if possible, development should be directed to part of site with lower residual risk of flooding. Planning applications should draw on the SFRA, PPS25 (and Practice Guide) and Core Strategy Policies SC1 and SC3, and it will be expected sustainable urban drainage systems are incorporated in design responses.

Summary

SFRA and this assessment conclude that this site passes the sequential / exceptions test - subject to appropriate design.

Appendix 1: Sequential test of strategic sites	
S29 Plaistow North	
Proposal for site	A new local centre is proposed, to include retail, residential and community uses, focussed around Plaistow underground station.
Flood Zone	SFRA identifies the site as being within Flood Zone 3.
PPS25 vulnerability of proposed land use	More vulnerable (or lower)
Reasonable alternative site/s available in same or lower flood zone?	No – a number of strategic sites included in the Proposed Submission Core Strategy are in Flood Zones 1 and 2, however almost all locations in the low and medium residual risk category are developed, safeguarded for open space or have long-standing planning permission for future development. There are no 'opportunity' sites providing alternative locations for major developments in these zones and regeneration of sites in Flood Zone 3 is central to achieving the spatial strategy.
Exceptions test	
a) it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by an SFRA and the Core Strategy's Sustainability Appraisal.	Regeneration of this brownfield site will provide wider sustainability benefits to the community that outweigh the risk of flooding. Inclusion of this strategic site in the Core Strategy is considered central to achieving the spatial vision and housing and regeneration aspirations set out in the London Plan. In addition, the Sustainability Appraisal prepared for the Proposed Submission Core Strategy has assessed this strategic site against the sustainability framework and concludes that regeneration is likely to have a positive impact on the baseline (depending on mitigation and implementation of other Core Strategy policies).
b) the development should be on developable previously-developed land	The development is located on previously developed land.
c) Flood Risk Assessment must demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.	Development proposals will require the preparation of a Flood Risk Assessment and if possible, development should be directed to part of site with lower residual risk of flooding. Planning applications should draw on the SFRA, PPS25 (and Practice Guide) and Core Strategy Policies SC1 and SC3, and it will be expected sustainable urban drainage systems are incorporated in design responses.
Summary	
SFRA and this assessment conclude that this site passes the sequential / exceptions test - subject to detailed breach analysis and appropriate design.	

S30 Royal Victoria West

Proposal for site	New residential, leisure and cultural uses will be supported at this gateway site to the Royal Docks. The Siemens Pavilion and Cable Car link to Greenwich Peninsular are due to be completed in March 2012 providing new visitor attractions. Public realm improvements, including an enhanced pedestrian and cycle link to Canning Town, and active water space are key priorities in this location.
Flood Zone	SFRA identifies the site as being within Flood Zone 3.
PPS25 vulnerability of proposed land use	More vulnerable (or lower)
Reasonable alternative site/s available in same or lower flood zone?	No – a number of strategic sites included in the Proposed Submission Core Strategy are in Flood Zones 1 and 2, however almost all locations in the low and medium residual risk category are developed, safeguarded for open space or have long-standing planning permission for future development. There are no 'opportunity' sites providing alternative locations for major developments in these zones and regeneration of sites in Flood Zone 3 is central to achieving the spatial strategy.
Exceptions test	
a) it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by an SFRA and the Core Strategy's Sustainability Appraisal.	Regeneration of this brownfield site will provide wider sustainability benefits to the community that outweigh the risk of flooding. Inclusion of this strategic site in the Core Strategy is considered central to achieving the spatial vision and housing and regeneration aspirations set out in the London Plan. In addition, the Sustainability Appraisal prepared for the Proposed Submission Core Strategy has assessed this strategic site against the sustainability framework and concludes that regeneration is likely to have a positive impact on the baseline (depending on mitigation and implementation of other Core Strategy policies).
b) the development should be on developable previously-developed land	The development is located on previously developed land.
c) Flood Risk Assessment must demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.	Development proposals will require the preparation of a Flood Risk Assessment and if possible, development should be directed to part of site with lower residual risk of flooding. Planning applications should draw on the SFRA, PPS25 (and Practice Guide) and Core Strategy Policies SC1 and SC3, and it will be expected sustainable urban drainage systems are incorporated in design responses.
Summary	
This assessment concludes that this site passes the sequential / exceptions test - subject to detailed breach analysis and appropriate design.	

S31 Royal Albert North

Proposal for site	Promotion of business and education uses, building on the strengths of the University of East London campus and land availability for innovative high tech manufacturing and research and development.
Flood Zone	SFRA identifies the site as being within predominantly in Flood Zone 1, however parts of the site (in particular the western part of the site) are located within Flood Zone 3.
PPS25 vulnerability of proposed land use	More vulnerable (or lower)
Reasonable alternative site/s available in same or lower flood zone?	Not applicable – most of this site is located in Flood Zone 1.

Exceptions test

a) it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by an SFRA and the Core Strategy's Sustainability Appraisal.	Regeneration of this brownfield site will provide wider sustainability benefits to the community that outweigh the risk of flooding. Inclusion of this strategic site in the Core Strategy is considered central to achieving the spatial vision and housing and regeneration aspirations set out in the London Plan. In addition, the Sustainability Appraisal prepared for the Proposed Submission Core Strategy has assessed this strategic site against the sustainability framework and concludes that regeneration is likely to have a positive impact on the baseline (depending on mitigation and implementation of other Core Strategy policies).
b) the development should be on developable previously-developed land	The development is located on previously developed land.
c) Flood Risk Assessment must demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.	Development proposals will require the preparation of a Flood Risk Assessment and if possible, development should be directed to part of site with lower residual risk of flooding. Planning applications should draw on the SFRA, PPS25 (and Practice Guide) and Core Strategy Policies SC1 and SC3, and it will be expected sustainable urban drainage systems are incorporated in design responses.

Summary

Most of this site is located in Flood Zone 1; as such, the exceptions test would only be required where 'highly vulnerable' development is proposed in Flood Zone 2 or where 'more vulnerable' development is proposed in Flood Zone 3. However, as the site includes areas in Flood Zone 3, the exceptions test has been applied.

The SFRA and this assessment conclude that this site passes the sequential / exceptions test - subject to 'more vulnerable' development being directed to lower flood zones, appropriate design, further breach assessment, surface water management strategy and agreeing emergency access arrangements.