

Hearing Statement prepared on behalf of the Anjuman-e-Islahul-Muslimeen

London Borough of Newham Local Plan
Submission Stage (Regulation 22) – Matter 13

November 2025

1 Introduction

- 1.1 This Statement is made on behalf of the Anjuman-e-Islahul-Muslimeen (London) UK ('AeIM') the owners of the majority of the Abbey Mills site¹ ('Site') (**Appendix 1**).
- 1.2 AeIM and the London Borough of Newham ('LBN') seek to agree a clear and coordinated approach for development of the Site consistent with a sound spatial strategy for Newham.
- 1.3 A pre-application meeting was held with LBN on 30 October 2025 to present a masterplan (**Appendix 2**), which included a replacement mosque as part of the proposals. A pre-application meeting with the GLA was also held on 21 November 2025².
- 1.4 This Statement addresses Matter 13³ and specifically proposed Policies SI1⁴ and SI2⁵ as far as they are relevant to Site N7.SA1⁶, and focuses on amendments that are required to make LBN's draft Local Plan ("the Plan") sound given AeIM's clear aspirations for their Site.

Q13.2 Is policy SI1 justified, effective and consistent with national policy and the London Plan?

- 1.5 In part, but certain parts require modification. Policy SI1's support for existing community facilities is justified as it recognises, in accordance with the NPPF⁷ and London Plan Policy SI⁸, that valued community and health facilities should be protected and only lost if there is no demonstrable current and future⁹ need for them (SI1 (b) (i)). Indeed, it is agreed that "A neighbourhood's social infrastructure is one its greatest assets"¹⁰ and that community facilities play an important role in supporting and enriching people's lives and important networks that make communities more connected and resilient¹¹. It is also agreed that "increased access" to such spaces should be at the heart of policy making¹² and that the local plan must plan for all types of social infrastructure¹³. However¹⁴, site specific circumstances must also play a part, and particularly in the case of the Site which was purchased to provide a mosque to serve the community. There is, however, no sound or logical basis for inhibiting the provision of such community facilities, or their enhancement in the way that the Policy as currently worded would potentially do.
- 1.6 Paragraph 3.123 of the Plan explains that the "... policy¹⁵ seeks to protect existing community facilities and health facilities, especially those in areas with a deficit of provision". In the context of Site N7.SA1 the Council has evidenced that there are no other Muslim places of worship within a 15-minute walking distance of the Site¹⁶.

¹ Site Allocation N7.SA1

² with LBN in attendance

³ Social Infrastructure

⁴ Existing Community Facilities and Health Facilities

⁵ New and Improved Community Facilities and Health Facilities

⁶ Abbey Mills

⁷ paragraph 98(c)

⁸ Developing London's social infrastructure

⁹ Author emphasis added

¹⁰ Plan paragraph 3.115

¹¹ Author emphasis added

¹² Plan paragraph 3.116

¹³ Plan paragraph 3.117.

¹⁴ See also Hearing Statement surrounding Matter 4 Made on behalf of the AeIM

¹⁵ With reference to Policy SI1

¹⁶ see page 111 of Appendix C of Community Facilities Need Assessment (2022) – EB044

- 1.7 There should therefore be no doubt that there is an existing deficit for a replacement mosque on the Site¹⁷.
- 1.8 However, it is both unsound and illogical for Policy S11 then to seek to impose restrictions, or to protect against, 'reconfiguration' – a term which is being set out and used distinctly from the concept of a use being lost, 'reduced in size'¹⁸ or relocated. The term 'reconfiguration' as a matter of ordinary language is "*the arrangement of parts or elements in a different form, figure, or combination*"¹⁹. The Policy in its current form would therefore have the unsound and illogical effect of seeking to inhibit, stifle or prevent such reconfiguration of an existing community facility where such reconfiguration would not involve any reduction in size, but would potentially significantly enhance a facility, including by increasing its size. That effect is antithetical to the general thrust of the Policy²⁰. It makes no sense to create a restriction on reconfiguration, or indeed the creation of enhancement or increased community facilities in this way. Moreover, such wording does not conform with London Plan Policy S1²¹. Such wording is therefore not effective, or justified and it conflicts internally with the Plan generally²² aspiration to plan for future needs, as well with the basic purpose behind Policy S11²³. Moreover, restrictions of this kind also conflict with draft Policy S12(7)(g.)²⁴. Therefore, stifling beneficial changes by the use of the word "reconfiguration" and in a way which does not provide any explicit support for the provision of enhancement of community facilities within draft Policy S11 is not planning for resilience. The policy as drafted is therefore unsound and not effective. Internal reconfiguration of existing spaces would, in most cases, also not require planning permission²⁵ therefore it further reinforces why the policy is unsound in and of itself needs amending.
- 1.9 We strongly recommend that the word 'reconfigured' should be removed from the draft policy as to enable change where change is necessary and explicit support of beneficial reconfiguration and/or increased provision of existing community facilities is recognised.

In particular, is the reference in part 2 (that if the loss of a facility can be demonstrated as being acceptable, then the preferred alternative use will be for the maximum viable amount of affordable housing) justified and will it be effective?

- 1.10 No. This prescription conflicts with London Plan Policy S1(G)²⁶. As already identified, Policy S11 is currently unsound in failing to provide the support for provision of enhanced or increased community facilities. The policy creates uncertainty as to what is meant by the loss of an existing facility in this respect. The policy itself or in its relationship with Policy S11 should be supporting what is proposed for N7.SA1 in terms of delivery of a mosque to replace the existing facility on the Site. It is unclear how the policy does that. However, without prejudice to that point, to the extent that it is appropriate to specify a preferred alternative use to replace an existing community facility use, the specification of affordable housing as opposed to housing conflicts with the NPPF which prioritises housing delivery generally²⁷. It is only within the

¹⁷ See also page 156 of the Plan, paragraph 4

¹⁸ Policy S11(1.)

¹⁹ Oxford Dictionary definition

²⁰ which is meant to be about recognising the importance of such community facilities and their provision

²¹ which does not seek to restrict or inhibit such reconfiguration nor with national policy

²² and draft policy

²³ as well as the London Plan and national policy

²⁴ which sets out (for all new and reprovided facilities) that they should be "designed with flexibility in mind, to allow the building to adapt to different users of the space over time"

²⁵ Section 55(2) of the Town and Country Planning Act 1990

²⁶ which states that "Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered"

²⁷ NPPF paragraph 61

supporting justification to London Plan Policy S1 where there is an acknowledgment that opportunities for affordable housing provision should be maximised where housing is considered an appropriate alternative use²⁸. The London Plan does not mandate however that affordable housing is the preferred alternative use in such circumstances.

- 1.11 We are in the midst of a housing crisis²⁹. The Plan does not credibly demonstrate how it achieves a 5-year housing land supply³⁰. This exacerbates LBN's current (and historic) weak supply position. On 23 October 2025 a joint policy statement was published³¹ setting out a new package of support for housebuilding in London³². Whilst delivering affordable homes across the Plan period is important, the priority under Policy S11 here must be to deliver 'homes', whilst maximising affordable homes³³. It is also clear that the maximum viable level of affordable homes is captured under draft Policy H3 (2)³⁴ and so there is no need to replicate the need under Policy S11. As currently drafted therefore the policy is neither sound³⁵ nor is it effective.
- 1.12 The policy must be re-drafted to remove the reference to delivering the "maximum viable amount of ~~affordable~~ homes" along with³⁶ modification to provide support for the principle of providing or enhancing the provision of community facilities³⁷.

Q13.3 Is policy S12 justified, effective and consistent with national policy and the London Plan?

- 1.13 Policy S12 is not justified, effective or consistent with national policy and the London Plan. It is agreed and accepted that a sufficient supply of community facilities creates sustainable places, but it is not agreed and there is no evidence to support the suggestion that such supply should be restricted, limited or capped by concepts of unmet demand. Policy S12 Part 1(c) appears to be implying that there would be some limitation on support for delivery of community facilities³⁸ unless some unmet demand can be demonstrated. London Plan Policy S1 requires that the social needs of London's communities are met for the purposes of plan making³⁹. The NPPF⁴⁰ also advises that strategic policies⁴¹ should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for community facilities in line with the presumption in favour of sustainable development, but neither of these policies are about imposing any requirement for the delivery of new or reprovided community facilities to demonstrate unmet demand.
- 1.14 Moreover, and in the context of the Site and the application of the Policy as currently worded, specific to Policy S12, Part 6 (a), a prescription or limitation that an allocation should do no more than re-provide existing facilities in terms of size (and in the context of Part 6(a)) a 'similar

²⁸ London Plan policy 5.1.8

²⁹ national, regional and local

³⁰ See Hearing Statement – Matters 4 & 5 prepared on behalf of AelM

³¹ by government and the Mayor of London

³² [Link](#) – Homes for London – A Package of Support for Housebuilders in the Capital

³³ and not prioritising them over homes generally

³⁴ Affordable Housing

³⁵ as it conflicts with the London Plan

³⁶ as addressed above

³⁷ as also addressed in the comments under Policy S12 below

³⁸ otherwise recognised to be of vital importance

³⁹ London Plan Policy S1(A)

⁴⁰ paragraph 20(c)

⁴¹ NPPF Annex 2: Glossary - Policies and site allocations which address strategic priorities in line with the requirements of Section 19 (1B-E) of the Planning and Compulsory Purchase Act 2004.

user footfall and catchment' is inherently and fundamentally unsound and fails to meet or reflect NPPF⁴². That is particularly so given⁴³ the substantial increase in forecast need for mosque worship space over the Plan period and, of course, the fact that the strategic policies⁴⁴ of the Plan should look ahead over a 15 year period from adoption. One can understand the logic of policies that seek to protect existing community facilities⁴⁵ unless one can demonstrate there is no demand⁴⁶, however there is absolutely no logic or other policy support⁴⁷ in seeking to constrain delivery of new or reprovided community facilities to their existing size, or a size which currently happens to exist on a site. This cuts right across the basic support that national and London Plan policies are seeking to give for community facilities bearing in mind their importance and their vulnerability to being lost to other uses. Rather than restrict reprovided facilities to their existing size, a sound policy⁴⁸, would in fact strongly support, seek to foster and encourage delivery of new or re provided community facilities in terms of any enhancement, including in terms of size. Moreover, there should obviously not be a requirement to demonstrate "need" in order to deliver new or reprovided community facilities in any event⁴⁹.

- 1.15 On the point of 'need' LBN has conceded elsewhere in its evidence base in preparing the development plan that the baseline position for community facilities is weak in the local area⁵⁰. Indeed, analysis shows there are no other Muslim places of worship within a 15-minute walking distance of the Site.
- 1.16 Using the latest population projections⁵¹, the Borough Muslim population is estimated to increase by 11.33% between 2022⁵² and 2035⁵³ - an increase of 14,352 people over 12 years.
- 1.17 If existing provision were to remain constant⁵⁴ the currently identified inadequate provision will simply deteriorate further. This is clearly out of step with the London Plan and the NPPF and requires the Plan to be amended for it to be sound. In this respect it is clear that that SI2 Part 1(a) and Part 6(a) are in conflict with the NPPF given that based on LBN's own evidence, the approach in the Policy is failing to look ahead over a minimum of 15 years from adoption to anticipate and respond to long-term requirements and opportunities
- 1.18 If the policy is to be retained, we request the following modification, and the removal of Parts 1⁵⁵ and 6⁵⁶.
- 1.19 Strong policy support for the provision of new or reprovided community facilities which enhance the provision in the area should also be expressed, rather than limitations imposed.

In particular:

⁴² paragraph 22

⁴³ in the case of N7.SA1

⁴⁴ Including site allocations

⁴⁵ given the pressure that the provision of such spaces face from delivery of other uses

⁴⁶ given the importance of such facilities

⁴⁷ in the London Plan or national policy

⁴⁸ , consistent with the NPPF

⁴⁹ albeit such need clearly exists in the current case

⁵⁰ see page 111 of Appendix C of Community Facilities Need Assessment (2022) – EB044

⁵¹ published by the Office for National Statistics ('ONS') - [link](#)

⁵² 124,287 people

⁵³ 138,639 people

⁵⁴ as appears to be LBN's current policy position in respect of site N7.SA1

⁵⁵ Part 1 - "a. the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery;"

⁵⁶ Part 6 – "it can be demonstrated it is of a similar user footfall and catchment to the existing facility; and"

a) The requirement in part 2c for community facilities that have 1,000 sqm or more floorspace or a user appeal beyond the local neighbourhood to be located within a town or local centre (unless part 2d is complied with in the case of main town centre use facilities).

- 1.20 Community facilities should be located in sustainable locations⁵⁷, but the Council's approach of seeking to limit the provision of community facilities of 1,000sqm or greater to their town or local centres is unsound and contrary to the principles of sustainability in any event.
- 1.21 The NPPF defines main town centre uses⁵⁸. We note that with regards to the Site of concern, the NPPF definition of a main town centre use does not include faith based uses⁵⁹ so this restriction would not apply to the proposal for a mosque. It is noted that draft Policy BFN1⁶⁰ also seeks to direct main town centre uses to the borough's network of centres⁶¹. It is agreed that such uses would be complementary in the Borough's centres, but it is unnecessary and unsound to mandate in this way that these must all be located within these locations. Each case should be considered on its own merits, taking into consideration matters such as catchment, access to existing facilities⁶², and accessibility.
- 1.22 We do not agree that the 1,000sqm threshold should apply to local centres, as by their very nature they serve a localised catchment⁶³. Plan Policy HS1⁶⁴ references a new local centre within the N7.SA2 Twelvetreets Park and Former Bromley By Bow Gasworks, which the Proposals Map seeks to extend into the Site. Part 3 of Policy HS1⁶⁵ sets out, in terms of overall scale ('b') that "The majority of units will be between 80sqm and 150sqm GIA each)". Emerging Policy HS2⁶⁶ also guides that at least 80 per cent of ground floor units should function within Class E⁶⁷. It therefore seems illogical to accept that a 1,000 sqm community facility should be located within a local centre wherein the predominant land use must be within Class E, and that the average unit size would be below 150sqm. In the case of the Site⁶⁸ this would almost certainly undermine its vitality and viability from the outset. For the many reasons set out within the Hearing Statement specific to Matter 4 we consider that it would not be appropriate to locate a reprovided mosque (even of the same⁶⁹ size as the existing) within the defined local centre⁷⁰. This also does not embrace the design led approach and the site specific circumstances of the Site.
- 1.23 We therefore request that Part 2 of Policy S12 is amended so that the reference to a 'local centre' is removed. In fact, without prejudice to the points already made, it would be more appropriate to direct facilities smaller than 1,000sqm (Policy S12, Part 3) towards local centres, but this is currently not the draft policy wording⁷¹. We therefore request that S12 (3) is also

⁵⁷ which will require consideration of a wide range of factors

⁵⁸ Annex 2: Glossary - "Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)."

⁵⁹ Meaning that Part 2d is not relevant

⁶⁰ Spatial Strategy

⁶¹ NPPF Paragraph 91

⁶² focusing on where deficiencies are apparent

⁶³ HS1.J - stipulated as 400m radius

⁶⁴ Newham's Town Centres Network

⁶⁵ specific to local centres

⁶⁶ Managing new and existing town and local centres

⁶⁷ The Town and Country Planning (Use Classes) Order 1987

⁶⁸ N7.SA1 where the LBN current position is to locate the existing faith based use within the local centre

⁶⁹ or larger – see Hearing Statement 4

⁷⁰ draft site allocation plan – N7.SA1

⁷¹ Indicating that these would be appropriate outside of town or local centres

refined to set a lower GIA threshold for local centres, which would be more appropriate in the context of their scale⁷², function, and the Plans desire for Class E uses to dominate.

b) Part 4 which states that speculative social infrastructure development will not be supported.

- 1.24 This restriction is unsound in principle. Under established planning principles, it is generally a matter for the market to determine whether an application should be "speculative"⁷³ whilst factoring flexibility to maximise the prospects of securing occupancy / income. It is on this basis that decision-making would ordinarily consider the 'in principle' matters surrounding appropriate land use(s) which often requires testing worst case scenarios to ensure policy compliance with all other policies. A blanket restriction on supporting "speculative" social infrastructure, regardless of its merits, lacks any coherence or good sense and cuts across the basic principle of supporting social infrastructure in any event.
- 1.25 It is also unclear how this restriction or lack of support is intended to apply. If it is intended to be applicable to faith-based uses⁷⁴ then it is also unsound because there is no justification for seeking to inhibit or fail to provide support for the delivery of such community based facilities and there should be no requirement to demonstrate "unmet demand" in any event.
- 1.26 Part 4 should be deleted as its unsound. Social infrastructure uses where proposed can be judged on their merits against the raft of other development plan policies. There is no basis for seeking to restrict them in this way.
- 1.27 If Part 4 is retained, there is no justification for applying it to faith based uses and in those circumstances, without prejudice to the points above, it should be updated as follows: -

"Speculative social infrastructure that comprise main town centre uses development will not be supported"

c) Whether the policy will provide an effective approach for proposals for large scale places of worship with specific characteristics (including for Islamic education, that reflect the specific accessibility and inclusion needs of women, children, elderly and those with disabilities).

- 1.28 The policy as drafted is ineffective in this respect. LBN has themselves identified a shortfall in provision for Muslim faith based facilities within their own strategic evidence base.
- 1.29 It is therefore inappropriate to seek to establish a requirement to demonstrate need in the context of SI2, where there is already an identified need and where the plan should be seeking to support delivery of facilities to address that need. It is a development plan requirement to set out an overall strategy for the pattern, scale and design quality of places whilst make sufficient provision⁷⁵. A sound policy should seek to foster and support delivery of community facilities for which a need has already been identified. There should not be an additional requirement to demonstrate "need". Moreover⁷⁶ the principle of restricting or capping delivery of community facilities⁷⁷ unless one can demonstrate a need is contrary to the London Plan and the NPPF which contain no such restrictions.

⁷² Within units of between 80sqm – 150sqm.

⁷³ although the use of that term itself gives rise to uncertainty and lack of clarity in a plan

⁷⁴ which are not main town centre uses

⁷⁵ NPPF paragraph 20

⁷⁶ for the reasons set out above

⁷⁷ given their importance

- 1.30 We consider⁷⁸ it unnecessary to consider large scale places of worship in the context of local centres as this puts disproportionate and unnecessary pressures on the successfulness of these centres. The thrust of the policy⁷⁹ should be focused on matters such as catchment, inaccessibility to existing facilities, and accessibility. To require such uses to be located within local centres⁸⁰ is therefore not flexible, taking into account that not all sustainable locations are within the Boroughs centre hierarchy.
- 1.31 As alluded to within the question, large scale places of worship provide more than just prayer space, and as being discussed with LBN currently, are capable of offering much wider public benefits to a community. The scheme currently being discussed⁸¹ includes such facilities, including a public hall, that can be offered to the public for events.

⁷⁸ In addition to our response to Q13.3(a)

⁷⁹ as relevant to large scale places of worship

⁸⁰ in particular

⁸¹ With the LBN and the GLA at pre-application stage

Appendix 1 – The Site (N7.SA1)

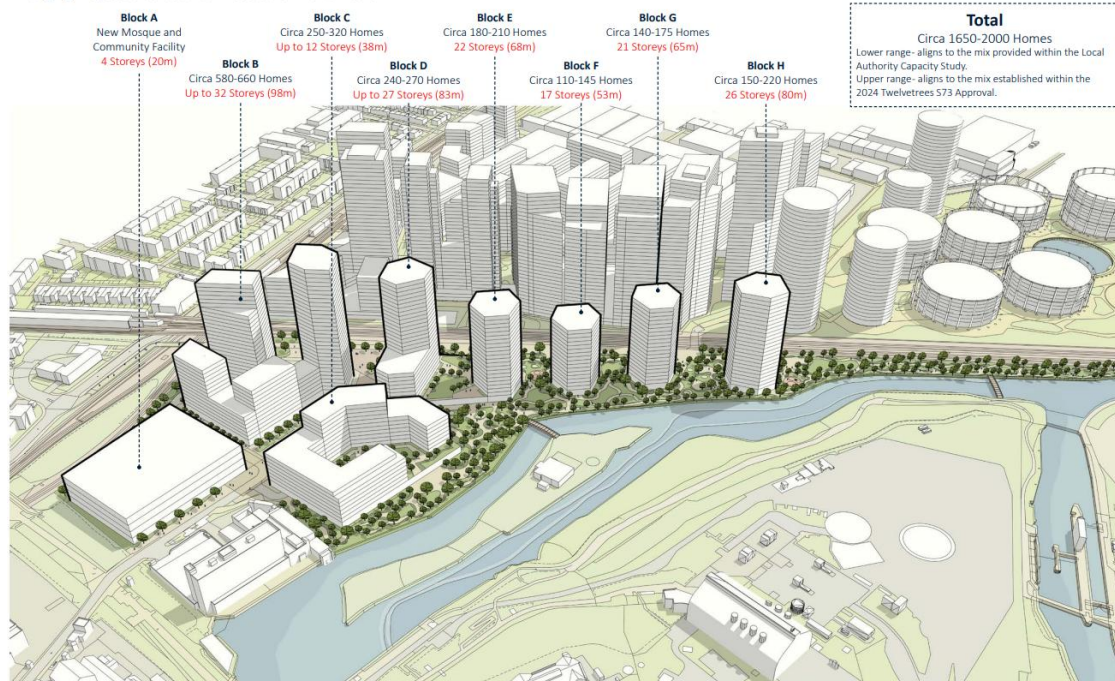


Appendix 2 – The Pre-Application Masterplan (Iterations 1 and 2)

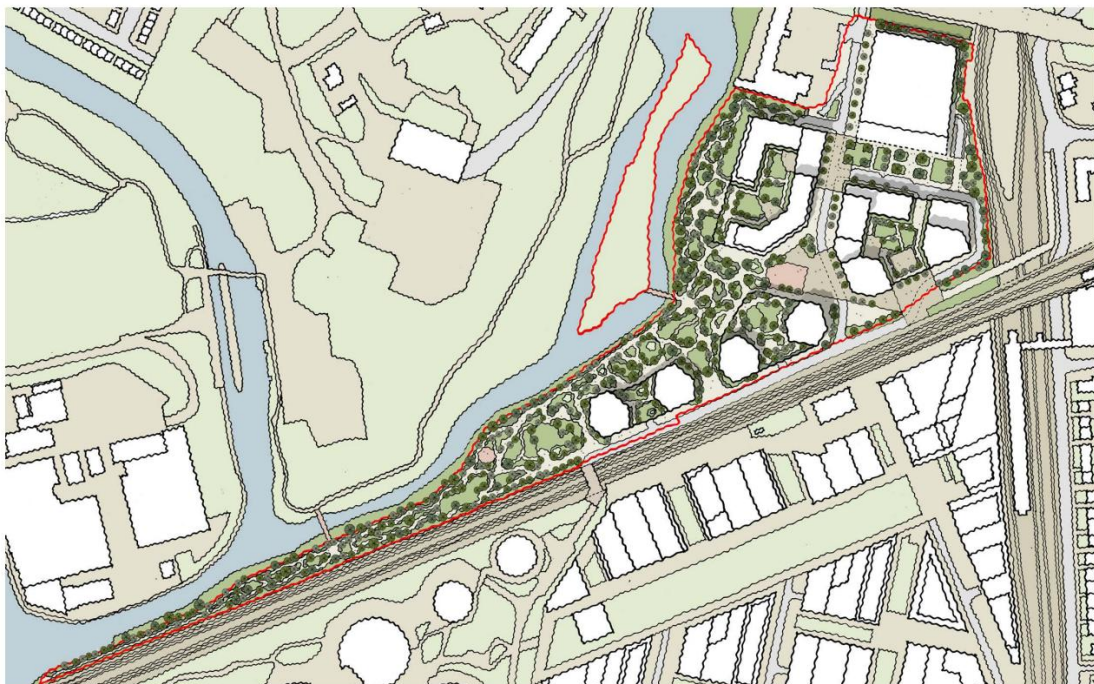
Emerging Proposals Iteration 01 Illustrative Masterplan



Emerging Proposals Iteration 01 Illustrative Axonometric



Emerging Proposals Iteration 02 Illustrative Axonometric



Emerging Proposals Iteration 02 Illustrative Axonometric

