



From: David Brown 
Sent: 06 July 2026 09:04
To: Local Plan
Subject: Newham Local Plan Examination - Representations (Representor Reference Number: REG19-E-023)
Attachments: Main Modifications Letter v1.0.pdf

Dear Sirs,

Please find attached representations to the Main Modifications to the Newham Local Plan, made on behalf of the Anjuman-e-Islahul-Muslimeen of (London) UK (referred to throughout the Local Plan Examination as 'The AeIM').

Please let me know should you have any questions.

Best wishes

David

6 July 2026
Ref: 2021/359

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Dear Sir / Madam,

Representations on the on the 'Tracked Changes' Version of the Newham Local Plan with Main and Additional Modifications May 2026

Representor Reference Number: REG19-E-023 (The Anjuman-e-Islahul-Muslimeen)

These representations are submitted to the London Borough of Newham ('LBN') on behalf of our client the Anjuman-e-Islahul-Muslimeen of (London) UK (referred to throughout the Hearing Statements / Hearings as 'AeIM'), in respect of the consultation on the Schedule of Main Modifications to the Newham Local Plan and the Proposed changes to Newham's submitted local plan policies map, May 2026.

Representations were made to the LBN in relation to their consultation on the Draft Submission Local Plan (Regulation 19) in September 2024. More recently, pre-application engagement with officers at LBN¹ and the GLA² took place which, in our opinion assisted greatly in the preparation of the Plan as it is currently drafted today.

In addition to the above, Hearing Statements on Matter 3 (Spatial Strategy), Matter 4 (Neighbourhood Policies and Allocations), Matter 5 (Housing Land Supply) and Matter 13 (Social Infrastructure) were provided on the Examination of the Newham Local Plan. The Hearing Statements provided a formal consultation response to the Inspector's Matters, Issues and Questions (MIQs) regarding the soundness of the Newham Local Plan which was submitted to the Secretary of State for Examination on 18th July 2025.

Appearances were also made by representatives of The AeIM at the Examination Hearing Sessions in December 2025 and January and February 2026.

Representations

As required by LBN, these representations are only in relation to the proposed Main Modifications to the Plan and we acknowledge that this consultation is not an opportunity to raise matters relating to other parts of the Plan. Therefore, our comments in the previous representations outlined above still stand.

¹ September – October 2025

² 21 November 2025

These representations also make comments on the Additional Modifications document, although we acknowledge that our comments in this respect are only for the LBN to take into consideration.

Draft Local Plan wording with Main Modifications ³ , additional / minor modifications ⁴ (Strike through for deletions and <u>bold underlining</u> for additions of text)			AeIM Comments
Draft Policy D4			
D4 Part 2	Part 1, p. 70	MM17	As a general observation The AeIM is pleased with the removal of 'only', allowing for tall buildings outside of the Tall Building Zones, subject to rigorous testing and to reflect the borough-wide spatial hierarchy. The AeIM is pleased to see the addition of TBZ16 (Abbey Mills) at 'd' and agree with the sentiment that managing height transitions should embrace a 'design led' approach.
Table 1	Part 1, p. 70	MM18	The AeIM is pleased to see the removal of 'maximum' building height ranges, replaced by 'appropriate heights' within the table heading, with the flexibility also running through the table generally. Specific to TBZ16 The AeIM fully support the recognition (following the work already undertaken by The AeIM) that appropriate heights should include buildings up to 100m (ca. 33 storeys), although for the reasons presented at the Hearings, we don't agree that these should only be located towards West Ham Station. Directing taller buildings to a subjectively indicated area around the station does not take account of the emerging context to the south of the Site and has the potential to limit the capacity of the Site, contrary to the aspirations of both the Draft Local Plan and the London Plan. The policy is still too prescriptive and should allow for greater flexibility which embraces a design led approach. Notwithstanding this, we do not support retention of the '40m Appropriate Height'

³ ED030

⁴ ED034

			reference as this is no longer relevant for the reasons set out below. The AeIM maintain that the height range has not been informed by full consideration of the emerging context to the south of the Site (as discussed at the Matter 3 and 4 Hearings) and so are unjustified. The inclusion of a second, lower appropriate height is ambiguous and has the potential to limit the capacity of the Site, contrary to the aspirations of both the Draft Local Plan and the London Plan. Practically speaking, there is a significant height differential between a c.40 and c.100m building, which does not reflect the Council's aspiration for considered transitions in height across TBZs. We maintain that the prevailing heights for TBZ16 have not been informed by full consideration of the emerging context to the south of the Site (as discussed at the Matter 3 and 4 Hearings) and so are unjustified and unsound. In this respect the policy remains overly, and unnecessarily perspective. In this context, requiring a prevailing height range of between 21m-32m and 40m is likely to result in an uncomfortable height differential between different buildings across the Site, and has the potential to limit the capacity, contrary to the aspirations of both the Draft Local Plan and the London Plan. The AeIM maintain here that the LBN has not carried out sufficient site-specific testing to ascertain at what height/and in which locations development on the site might challenge, undermine or harm the significance of the conservation area, bearing in mind that recent consents have set a new skyline within its setting. The LBN has also not defined which aspect of significance would be preserved by a 'careful transition' to the conservation area, therefore this part of the policy is unjustified.
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			The AelM therefore suggest an amendment to this element of the policy which reinforces the need to take account of the conservation area without being overly prescriptive, reflecting the wording/approach of London Plan Policy D9(C)(c).
D4 Part 5	Part 1, p. 78	MM19	No comment – although The AelM acknowledge the direction of travel with the ability to test tall buildings outside of their tall building zones.
D4 Map of Newham's Tall Building Zones	Part 1, p. 79	MM20	The AelM is pleased to note the changes to TBZ16 – which is also reflected within the Proposed changes to the Local Plan Policies Map (ED031), however maintain the position at the Hearings that limiting the 100m zone to a small part of the Site is overly prescriptive as any masterplan would be required to adopt a design led approach.
D4 Justification text	Part 1, p. 80	MM21	The AelM is pleased to see the recognition of 'transform' areas which reflects the significance of the Three Mills (N7) neighbourhood Area and its position as being an area capable of accommodating 'maximum capacity' within the Borough. The AelM is also pleased to see that there is an acceptance that existing and emerging heights play a significant role in embracing a design led approach as well as placemaking principles surrounding town and local centres forming the hearts of their neighbourhoods.
Implementation text D4 part 1	Part 1, p. 80	AM31	No comments – although it is worth noting that <i>the Towards a new London Plan Consultation on the next London Plan Consultation document (May 2025)</i> considers the option of redefining a tall building and tall building clusters, using alternative thresholds. Whilst still in the formulative stages, the messaging from the GLA is an important one, particularly for London Boroughs who are currently preparing new local plans.
Implementation text D4 part 2	Part 1, p. 81	AM32	The AelM is pleased to see the removal of 'maximum permissible' heights (replaced with 'appropriate height'.

			As a general point, The AelM welcome the ability to present a case for tall buildings outside of the Tall Building Zones, which recognises the <i>R (London Borough of Hillingdon) v Mayor of London [2021] EWHC 3387 (Admin)</i> High Court judgment on the application of London Plan Policy D9.
Implementation text D4 part 3	Part 1, p. 81	AM33	No comments
Implementation text D4 part 4	Part 1, p. 84	AM34	No comments
D4 Policy Links	Part 1, p. 84	AM35	No comments
Draft Policy N7.SA1			
Policy N7 Three Mills Part 11	Part 2, p.452	AM195	No comments
N7.SA1 Abbey Mills Indicative diagram key	Part 2, p. 454	MM143	The AelM maintain that the illustrative diagrams should have no policy status and are provided for guidance purposes only. The AelM note that MM68, MM73 and MM94 are relevant here as each references the site allocation illustrative diagrams and that although indicative, show “how development could be delivered” and then indicates that an “alternative layout could deliver outcomes consistent with the allocation policy”. At the hearing, the AelM previously sought the removal of the final part of the wording which attached some presumptive force to the indicative diagrams which the LBN accepted was not the intention. We therefore maintain the position that the policy is unjustified and be amended in the way we understood the LBN accepted in order to make it explicitly clear that: 1. The illustrative diagrams have no policy status and are provided for guidance purposes only; 2. Development proposals will be assessed solely against the written policy

			requirements and other relevant policies in the Plan; 3. Alternative layouts that satisfy the policy requirements will not be prejudiced or subject to additional scrutiny merely because they depart from the indicative diagrams; and 4. The masterplanning process under policy BFN2 do not treat the illustrative diagrams as a starting point or baseline against which alternatives must be justified if they depart from the illustrative diagrams. The alternative wording we therefore suggest is as follows: <i>"Each site allocation includes illustrative diagrams showing one potential way in which development could be delivered. These diagrams are indicative only, have no policy status, and do not form part of the development plan. The delivery of these sites will be shaped through co-designed masterplanning in accordance with policy BFN2, assessed against the written policy requirements. Alternative layouts that deliver outcomes consistent with the allocation policy and other policies in the Plan will be supported."</i>
Policy N7.SA1 Abbey Mills	Part 2, p. 455	MM144	Whilst The AelM recognise movement away from the prescriptive originally drafted wording, the policy isn't positively planned and conflicts with the Framework (paragraph 22 NPPF) which requires plans to look ahead over a 15 year period from adoption. Allowing for no growth in terms of a replacement mosque is therefore not positively planned. The evidence within EB044 (appendix C) identifies that the baseline for community facilities (and mosque provision) is weak in the local area – within a 15 minute walking distance. To plan positively The AelM request the policy be amended (taking also into account the

			AeIM response to AP62⁵ and LBN's response to AP62 within ED029) as follows: - "Development should replace the existing temporary mosque of no less floorspace than what currently exists with the equivalent amount of community floorspace, meeting the requirements of Local Plan Policy S11 and London Plan Policy S1. Development should address the need for community facilities in the area by delivering new community facilities in Twelvotrees Local Centre, unless it can be demonstrated that the needs of the community have already been met.... " The AeIM support the inclusion of 'In addition to the mosque'...
Policy N7.SA1 Abbey Mills	Part 2, p. 455	AM196	No comments
Policy N7.SA1 Abbey Mills Design principles	Prt 2, p. 455	MM145	As presented at the Hearings, The AeIM strongly supports and is pleased to see the deletion of the second paragraph which required the community facilities to be located to the south east of the Site in proximity to West Ham Station and as part of Twelvotrees Local Centre. The AeIM maintain that the height range has not been informed by full consideration of the emerging context to the south of the Site (as discussed at the Matter 3 and 4 Hearings) and so are unjustified. The inclusion of a second, lower appropriate height is ambiguous and has the potential to limit the capacity of the Site, contrary to the aspirations of both the Draft Local Plan and the London Plan. Practically speaking, there is a significant height differential between a c.40 and c.100m building, which does not reflect the Council's aspiration for considered transitions in height across TBZs. In this context, requiring a general height range of between 21m-32m and 40m is likely to result in an uncomfortable height differential between different buildings across the site, and has the potential to limit the capacity, contrary

⁵ ED028

			to the aspirations of both the Draft Local Plan and the London Plan. The AeIM note that the removal of 'West Ham Station' (FM040) picked up in v.3 was not carried across to versions '4' and '5' despite the inclusion of "Routes to and from the site should improve access and connectivity to West Ham Station." Within versions '4' and '5'. Notwithstanding The AeIM's previous position from the Hearings that this requirement should be removed in its entirety, The AeIM consider, to avoid repetition that the v.3 text is progressed if it is to remain.
Policy N7.SA1 Abbey Mills Infrastructure requirements	Part 2, p.456	MM146	No comments
Policy N7.SA1 Abbey Mills Infrastructure requirements	Part 2, p.456	AM197	The AeIM wish to reiterate that it is currently unreasonable and unjustified to request the provision of an improved bridge connection to West Ham Station in the absence of evidence to demonstrate that this is needed. We therefore consider the proposed alternative wording to be perfectly reasonable at this stage: - Development should consider improvements to the existing provide an improved bridge connection to West Ham Station.
Policy S11			
Part 1, p. 154	Policy S11	MM36	In the context of N7.SA1 the AeIM welcome removal of 'reconfigured' and the updated wording within '2' to reflect what was discussed during the Hearing session.
Part 1, p. 156	Policy S11 Implementation text	MM37	No comments

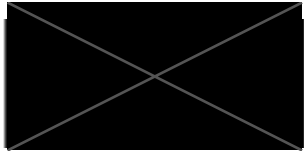
Draft Policy SI2			
Policy SI2	Part 1, p. 159	MM38	The AeIM maintain their position that it is not necessary or justified to re-open 'need' for allocated sites. The LBN has already prepared a sound evidence base – EB044 (Community Facilities Needs Based Assessment (2022). London Plan Policy S1 states (part A) that (emphasis added) <i><u>"When preparing Development Plans, boroughs should ensure the social infrastructure needs of London's diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community."</u></i> We consider that this requirement has been satisfied as a result of the Local Plan evidence base and that London Plan policy does not seek a further layer of needs based testing on a site by site basis, particularly when it comes to allocated sites. The policy calls for this when preparing development plans. Indeed, for planning applications, London Plan Policy S1 (which is specific to social infrastructure) states at Part D that (emphasis added) <i><u>"Development proposals that seek to make best use of land, including the public-sector estate, should be encouraged and supported."</u></i> This reinforces that for a further assessment of need is not justified at the planning application stage and for this reason Policy SI2 is not consistent with the London Plan and is therefore not justified.

As per previous written representations, AeIM strongly supports the site allocation N7.SA1 and the wider aspirations of the Three Mills area.

Alongside LBN, the AeIM believe there is a real opportunity to build on the area's inherent strengths and recent infrastructure investment and create a new sustainable neighbourhood that provides local houses and local jobs for local people. The AeIM is committed to continue working

with LBN and other stakeholders to bring forward this strategically positioned brownfield site. Accordingly, we would wish to be notified of future Examination stages.

Yours faithfully,

A black rectangular box with a white 'X' drawn across it from corner to corner, used to redact a signature.

David Brown

Director

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