

[REDACTED]

From: [REDACTED]
Sent: 11 June 2026 14:11
To: Local Plan
Subject: Local Plan Main Modifications Consultation
Attachments: Response form Main_Mods Hagley Ltd.pdf

Dear Planning

Please see attached representations on behalf of my client Hagley Ltd.

I trust these can duly be considered.

Kind Regards

John Ferguson BSc (Hons), PG Dip TP, MRTPI
Director
Collective Planning

T: [REDACTED]
E: [REDACTED]
W: www.collectiveplanning.co.uk

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Response Form for Consultation of Proposed Main Modifications to the Newham Local Plan 2026 – 2042

	Local Plan Consultation of Proposed Main Modifications to the Newham Local Plan 2026 – 2042 Response Form	Ref: (For official use only)
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Name of the Local Plan to which this representation relates:

Newham Draft Submission
Local Plan

Privacy Notice

Who we are

London Borough of Newham (LBN) is registered with the Information Commissioner's Office (ICO) as a 'Data Controller' This privacy notice applies to you ('the service user') and LBN ('the Council'). The Council takes the privacy of your information very seriously.

This privacy notice relates to our functions relating to the Consultation of Proposed Main Modifications to the Newham Local Plan 2026 – 2042. It also provides additional information that specifically relates to this particular consultation, and should be read together with our [general privacy notice](#), which provides further detail.

What data do we collect and process

We collect your name, contact details, email address, job title and organisation if applicable and demographic equalities data if you choose to share it.

Why we collect your data

The consultation is a requirement of the Town and Country Planning (Local Planning) (England) Regulations 2012. We collect your data so that we can get your views on the legal compliance or soundness of the Local Plan, as well as its compliance with the duty to co-operate.

The lawful basis for processing your data

The lawful basis we use to process your data as set out in UK data protection legislation is:

Article 6 (a) Consent: the individual has given clear consent for us to process their personal data for a specific purpose.

Article 9 (a) Explicit Consent: the data subject has given explicit consent to the processing of those personal data for one or more specified purposes.

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

You can withdraw your consent at any time.

How we use your data

This data is collected, collated and then submitted to the Secretary of State, who will appoint an Inspector to conduct an independent examination of the Local Plan. Demographic data will be processed anonymously to assess the effectiveness of our consultation. Where you have consented, your contact details will be added to our consultation database for future consultations and updates on the Examination in Public. At submission representations will be made public on the council's website, including name of person and organisation if applicable making representation. Other

personal information will remain confidential. Representations, in full, submitted along with the Local Plan, evidence base and documents Submission Draft Newham required by legislation to the Planning Inspectorate and to the person the Secretary of State appoints as the Planning Inspector. Contact details will be made available to the Inspector and Programme Officer so they can contact individuals to participate in the Examination.

Consultation database is stored on Mailchimp and accessed by planning policy team only. Mailchimp stores names and email addresses of those on the consultation database in line with Mailchimp policies, particularly its [data processing addendum](#). Please be aware they may store personal data external to the UK specifically in the USA and/or EU.

Who we will share your data with

We will share your data with the Planning Inspector appointed by the Secretary of State, the Programme Officer appointed by Newham, and within the planning policy team. Your name and organisation (if applicable) will be published on our website along with representations upon submission. Demographic data will be processed anonymously to assess the effectiveness of our consultation.

How long we will keep your data

We will keep your data safe and secure for a period of 15 year(s) in line with our retention Schedule. After this time, it will be securely destroyed.

How do we protect your data

We comply with all laws concerning the protection of personal information and have security measures in place to reduce the risk of theft, loss, destruction, misuse or inappropriate disclosure of information. Staff access to information is provided on a need-to-know basis and we have access controls in place to help with this.

See the [Planning Inspectorate Customer Privacy Notice](#) for details on how they keep your data safe and secure.

Know your rights

We process your data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Find out about your rights at [Your rights – Processing personal data privacy notice – Newham Council](#) or at <https://ico.org.uk/your-data-matters/> If you have any queries or concerns relating to data protection matters, please email: dpo@newham.gov.uk

Response Form

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

Anonymous responses cannot be accepted. Representations will be published with your name, but personal contact details will be kept confidential.

Personal Details*

Agent's Details (if applicable)

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent.*

Title		Mr
Name		John
Job Title (where relevant)		
Organisation (where relevant)	Hagley Ltd c/o agent	Collective Planning
Address Line 1		1 Long Lane
Line 2		
Line 3		
Line 4		London
Post Code		SE1 4PG
Telephone Number		
E-mail Address (where relevant)		

Representor type (Please tick as appropriate)

Works in Newham
Statutory Consultee
Resident
Elected official
Developer
Community Group Representative
Business owner
Other (please specify)

☐	
☐	
☐	
☐	
☐	
☐	
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Part B – Please use a separate sheet for each representation

Name or Organisation: Hagley Ltd

What chapter is your response referring to?

Please tick as appropriate

Vision and Objectives		Building a Fairer Newham	
Design	x	High Streets	
Social Infrastructure		Inclusive Economy	
Homes		Green and Water Spaces	
Climate Emergency		Transport	
Waste and Utilities			

Neighbourhoods - N1 North Woolwich		Neighbourhoods - N2 Royal Victoria	x
Neighbourhoods - N3 Royal Albert North		Neighbourhoods - N4 Canning Town	
Neighbourhoods - N5 Custom House		Neighbourhoods - N6 Manor Road	
Neighbourhoods - N7 Three Mills		Neighbourhoods - N8 Stratford and Maryland	
Neighbourhoods - N9 West Ham		Neighbourhoods - N10 Plaistow	
Neighbourhoods - N11 Beckton		Neighbourhoods - N12 East Ham South	
Neighbourhoods - N13 East Ham		Neighbourhoods - N14 Green Street	
Neighbourhoods - N15 Forest Gate		Neighbourhoods - N16 Manor Park and Little Ilford	
Neighbourhoods - N17 Gallions Reach			
Other (please specify)			

What is the Main Modification or map change reference(s) you are commenting on?

You can find the modification reference in the main modifications table. We acknowledge an issue may relate to more than one Main Modification, in which case please reference all relevant modification references.

MM110
MM18, MM94

Response

Please focus your comments only on the Proposed Modifications and please provide:

- The Main Modification or Policies Map change reference(s) you are commenting on
- Whether you consider the modification legally compliant and/or sound
- If unsound, which test(s) of soundness it fails and the change you seek
- Any evidence supporting your view
- Any alternative wording you wish to propose

This consultation should not be used to:

- Repeat comments previously made at Regulation 18 or 19 stages
- Comment on parts of the Plan that are not subject to a Proposed Modification

MM110
Lyle Park West

Our client welcomes and supports the amendment to taller buildings to “approximately 60m (ca. 20 storeys)”.

Our client however considers it disappointing and unsound the building height range between 21-32m (ca. 7-10 storeys), remains unchanged. Whilst a less prescriptive approach is proposed through the introduction of the word “generally”, the height range still falls short of existing local plan policy and national policy requirements. Introduction of this word does not go far enough in making this part of the policy sound.

For reasons set out in our previous representations (dated 19th August 2023), and explained at the Examination in Public, it is considered a restrictive policy of 7-10 storeys is not justified, as briefly summarised below:

- *Lack of Justification for Change to Existing Local Plan position on Building Heights*
The evidence base for the Local Plan, relevant to tall buildings, includes the Tall Building Assessment and Characterisation Study. These inform the tall building policy. For this site allocation it considers the site is ‘not sensitive to change’, in a ‘high opportunity for growth area’ and a designated area for ‘transform’.
- *Existing Local Plan Inspector’s Comments on Building Heights*
The Inspector found it unjustified for similar previously proposed building heights to be restricted and ultimately required taller building heights for Lyle Park West to make the allocation and plan sound. The EiP report stated: “As it stands, the restriction of building heights in these Strategic Sites is unjustified, as it fails to reflect their role and function as key regeneration sites in accessible locations, contrary to both the Framework’s core planning principles”
- *National Planning Policy Framework position*
The current NPPF places a greater emphasis on making effective use of land and building at higher densities. Paragraph 129 requires plans to, “contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas”

MM18
TBZ11: Lyle Park West

The same points made regarding the general 7-10 storey building height above relate to the amendment to the tall building policy at MM18.

In addition, there is an inconsistency in relation to the opportunity to include tall building elements. The amendment has failed to update the 40m (ca. 13 storeys) restriction, to 60m, to be consistent with the MM110 amendment. This should therefore be updated.

MM94

Our client welcomes the clarification the site allocations illustrative diagrams are indicative, rather than being prescriptive.

(Continue on a separate sheet /expand box if necessary)

Do you wish to be notified about future Examination stages:

Yes ☒ No ☐

Please return to London Borough of Newham by 5pm 7th July 2026