



From: WISEMAN, Mark (NHS NORTH EAST LONDON ICB - A3A8R) 
Sent: 06 July 2026 14:26
To: Local Plan
Cc: 
Subject: NEL NHS ICB Consultation Response - Local Plan Main Modifications
Attachments: Consultation Response Main Modifications Local Plan - NEL NHS ICB - 060726.pdf

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Dear Sir, Madam.

Please find attached our consultation response to the ongoing Main Modifications consultation for the New Local Plan. We are specifically commenting on MM38 and 39 of the schedule.

I trust this response is self-explanatory but please do not hesitate to contact me should you require clarification.

Kind regards

Mark Wiseman, Senior Regeneration Officer
NHS North East London
Pronouns: He/Him
NHS North East London
Part of North East London Health and Care Partnership

E: 
A: 20 Churchill Place, Canary Wharf, London, E14 5SH

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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	Mark Wiseman	
Job Title (where relevant)	Senior Officer: Town Planning	
Organisation (where relevant)	NEL NHS ICB	
Address Line 1	20 Churchill Place	
Line 2	Canary Wharf	
Line 3		
Line 4		
Post Code	E14 5HJ	
Telephone Number		
E-mail Address (where relevant)		

Representor type (Please tick as appropriate)

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

Part B – Please use a separate sheet for each representation

Name or Organisation: North East London NHS Integrated Care Board

What chapter is your response referring to?

Please tick as appropriate

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

Neighbourhoods - N1 North Woolwich		Neighbourhoods - N2 Royal Victoria	
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.

MM38 and MM39:

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

Representation on Main Modification 38 and 39 (Policy S12)

We welcome Main Modification 38, which significantly strengthens the policy framework for health facilities. In particular, the separation of health facilities from wider community facilities, the expectation that health facilities identified through site allocations should be delivered, and the requirement for engagement with NHS partners all improve the effectiveness of the policy.

However, further amendments are needed to ensure that the policy can deliver health infrastructure alongside the scale of housing growth proposed in the Local Plan.

The National Planning Policy Framework (NPPF) requires planning policies to support healthy and safe communities and to take a proactive approach to planning the infrastructure needed to support growth. It also requires local planning authorities to work collaboratively with infrastructure providers to identify, plan for and deliver the infrastructure required to support sustainable development. The London Plan similarly requires boroughs to plan positively for social infrastructure through collaboration with infrastructure providers (Policy S1) and to support the provision, expansion and modernisation of health and social care facilities (Policy S2).

While Main Modification 38 provides a stronger policy basis for health facilities, the implementation text could be strengthened to provide greater certainty over how healthcare infrastructure will be planned and delivered.

1. Recognition of neighbourhood health centres

Insert additional supporting text after Policy S12.1:

"Health facilities include neighbourhood health centres, integrated primary and community care facilities, diagnostic facilities and other models of health infrastructure that support integrated neighbourhood working. The design and delivery of health facilities should reflect the strategic estate plans of the NHS and evolving models of health and care delivery."

This amendment would futureproof the policy by recognising that NHS estate planning is increasingly centred on integrated neighbourhood facilities rather than traditional single GP premises.

2. Strengthen implementation text on NHS collaboration

The current implementation text encourages consultation with NHS partners for new facilities outside of planned provision on site allocations.

We recommend this wording is not exclusive to sites outside of planned provision. The current 'Health facilities' wording should be moved to sit earlier in the implementation text and replaced by the following:

"Applicants should work with the relevant health partners in Newham, including NHS NEL ICB, Barts Health NHS Trust, East London NHS Foundation Trust, Health and Care Space Newham and HUDU/NHS Property Services, from the earliest stages of design and masterplanning to determine the location, specification, timing of delivery and appropriate delivery mechanism for health facilities identified through site allocations or otherwise required to support planned growth."

This amendment reflects the collaborative approach to infrastructure planning promoted by the NPPF and London Plan Policy S1. It would also provide greater certainty that healthcare facilities are planned alongside development rather than considered later in the planning process.

3. Planning obligations for health infrastructure

Insert additional implementation text:

"Where development generates a need for new or expanded health infrastructure, the Council will work with NHS partners to secure the timely delivery of health facilities. Where the statutory tests are met, planning obligations may be used to secure land, shell and core accommodation, financial contributions, phased delivery arrangements or other measures necessary to support the provision of health infrastructure."

This amendment would provide a clear policy basis for using Section 106 agreements, where appropriate, to secure healthcare infrastructure required to mitigate the impacts of development and would align the Local Plan with national policy on infrastructure delivery.

Finally, we recommend a minor addition to the implementation text relating to site allocations:

Current wording:

"Applicants need to consider what type of facility is needed and when it is required to be operational."

Additional wording:

"Applicants should also work with the relevant NHS organisations to determine the type of health facility required, its location, specification, timing of delivery and appropriate delivery mechanism."

This small addition would improve the effectiveness of the policy by recognising that successful delivery of healthcare infrastructure depends not only on identifying need, but also on agreeing how and when facilities will be delivered in collaboration with the NHS.

(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