

## James Scantlebury

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**From:** Delia Taasin <[REDACTED]>  
**Sent:** 05 September 2024 15:58  
**To:** Local Plan  
**Subject:** Regulation 19 Consultation Response  
**Attachments:** Response\_form\_\_Final (1) (2) (1).pdf

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Dear all,

Please find attached response on the Regulation 19 Consultation.

Kind regards

[REDACTED]

Operations Manager  
Just Homes Charity

[REDACTED] [www.justhomes.org.uk](http://www.justhomes.org.uk)


[REDACTED] | Mobile [REDACTED]

**JUST HOMES CHARITY** | Registered Charity No: 1128311 Just Homes Charity Company No: 6777157 England | **FIRST FRUIT** | Registered Charity No: 1066749  
| First Fruit Company No: 03477267 England.

Registered address for both: 34 Norwich Road, Forest Gate, London E7 9JH | **THIS EMAIL** and any files transmitted with it contain information which is private and confidential, and is intended solely for the use of the individual or entity to whom it is addressed. If you are not an addressee you are not authorised to read, copy or use the email or any attachment. If you are not the intended recipient please notify the sender by return email and then destroy it.

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**Response Form for Regulation 19 Consultation.**

	<p><b>Local Plan</b> Publication Stage Response Form</p>	<p><b>Ref:</b></p> <p><b>(For official use only)</b></p>
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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 Newham Local Plan Review Consultation (Regulation 19). 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.

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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 only 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 is not shared with the Planning Inspector or the Programme Officer.

We will not share your personal information with any other third parties unless you have specifically asked us to, or if we have a legal obligation to do so.

### **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](mailto:dpo@newham.gov.uk)

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# Response Form

For guidance on how to complete this representation form please view the Regulation 19 Consultation Guidance <https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh>.

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

### 1. Personal Details\*

### 2. 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 in 2.*

Title	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Delia"/>	<input type="text"/>
Last Name	<input type="text" value="Taasin"/>	<input type="text"/>
Job Title	<input type="text" value="Operations Manager"/>	<input type="text"/>
Organisation	<input type="text" value="Just Homes Charity Newham"/>	<input type="text"/>
Address Line 1	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 2	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 3	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value="REDACTED"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value="REDACTED"/>	<input type="text"/>

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

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Name or Organisation:

3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)

Policy

Implementation Text

Paragraph

Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

4 (3) Complies with the  
Duty to co-operate

Yes

No

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

## **Local Area planning consultation - Challenges Faced and Contributions that can be made by Supported Housing Providers.**

Street homelessness, high levels of unemployment, overcrowding, and influx of people into the borough are major challenges faced by Newham in recent years. Increased levels of crimes are going unreported in areas like, house breakings, pick pocketing and car thefts – reflecting the community accepting Police response is unlikely to produce a result. Rubbish dumping is increasingly common despite best efforts by the council. It is to be acknowledged; these are practical demonstrations of rising levels of poverty. The council's purse is strung due to pressure on its budgets to address local needs. This local area planning needs to be addressed against this backdrop. How can the money we have made to go the furthest is a question we need to address in this strategy.

**Accommodation-based support providers** can play a crucial part in supporting the council to address some of these multiple needs.

Supported Accommodation are specifically for people '**who want to and agree to be**' helped in some ways to address issues that are currently preventing them from integrating back into society as contributing citizens. Hence Supported Accommodation can be used as a powerful tool to address issues around lack of employability skills, Lack of work experience and needs around getting people into employment.

It is good to see increasing the provision of 'affordable accommodation' is high on the Council's strategy.

**Harnessing the power of the Developers:** Where there is a sustained market demand, Businesses will thrive. Hence plan to create a market harnessing the investment power of the suppliers.

With an influx of new housing related developments into the borough, the council should consider placing some conditions for developers to be using local labor, local contractors and local suppliers. Developers are required to invest in training local communities in skills. The developers can also form links with our local technical colleges, encouraged to influence the teaching curriculum and provide work placements for students, giving them valuable industry experience. Developers could also be encouraged to take local residents into employment and especially those in temporary and supported accommodations.

This strategic planning opportunity should be used by the council to plan, bring together and prepare our local suppliers, contractors, technical colleges and Supported Housing providers to step up to take advantage of this Business Market and rise up to the mark to meeting the local quotas imposed by the council on Housing Developers. Supported Housing providers can be a key ally in supporting local residents into taking up training and employment opportunities created in this area.

**Reflection on the present Housing situation:** Currently, many **Hotels and Bed and Breakfast** accommodations are being used as temporary accommodation provision to relieve the Council's duty to relieve homelessness. In spite of such provision being both expensive and unsuitable for purpose, the lack of accommodation is forcing the council to take up this expensive strategy that puts pressure on the council's budget. It is also a known fact that, the rent in the private rented accommodation has sharply increased with those on already in the lower income brackets, forced to make up the difference from their pockets to keep a roof over their heads.

**Harnessing the power of Supported Accommodation:** If planned and strategically executed, supported accommodation can address many issues faced by the council and hence a powerful tool in reducing dependency on the benefit system. Clear aims and objectives should be set for each supported accommodation. Targets should be monitored against performance. Supported housing providers should be required to have a charitable aim to ensure profits are not syphoned out of the organization. Currently supported accommodation providers face many challenges. Access to affordable buildings to operate from is one key factor. With Article 4 directive in the borough, it is not easy for providers to replace provisions when landlord requires properties they operate from back, either for redevelopment or to let it out on higher rents due to local demand for space. Some of these 'New affordable accommodation' provisions should be ringfenced for supported accommodation. The intensive housing Management costs associated with temporary accommodation should be viewed and ensured as an investment in addressing issues around dependency on the benefit system. Supported Housing providers should also be supported in practical ways to become registered Housing providers. This will in turn support the local councils with the benefit of claiming central government subsidy for intensive Housing management costs. Currently projects like ours are receiving 10 times the number of referrals than we are able to accommodate. Around 20% of these referrals are from those with just accommodation needs however the vast majority of 80% have varying levels of support needs. It will be good to direct only those with support needs and a willingness to address them be channeled through Supported Accommodation Providers. I hope this new local strategy will recognize the part Supported Housing Providers can play in addressing local needs, address the challenges faced by Supported Housing Providers and strategically use them to tackle the high levels of unemployment, homelessness, crime and dependency on benefit system faced by our borough.

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



6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☒

No, I do not wish to participate in hearing session(s)

☐

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

***Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.***

9. Do you wish to be notified about:

a. the submission of the local plan for independent examination

Yes ☒ No ☐

b. the publication of the Inspector's report

Yes ☒ No ☐

c. the adoption of the Local Plan

Yes ☒ No ☐

10. Would you like to be added to our consultation database to be notified about future planning policy consultations?

Yes ☒ No ☐

**Please return to London Borough of Newham by 5pm 6<sup>th</sup> September 2024**