

CABINET

7.30 p.m.

**Wednesday
19 September 2007**

**Council Chamber
Town Hall**

Members 10: Quorum 5

Councillor Michael White

Leader of the Council (Chairman)

Councillor Steven Kelly (Deputy Leader)

Sustainable Communities & Health

Councillor Michael Armstrong

Housing & Regeneration

Councillor Peter Gardner

Public Safety

Councillor Andrew Curtin

Public Realm

Councillor Barry Tebbutt

StreetCare & Parking

Councillor Paul Rochford

Environmental & Technical Services

Councillor Eric Munday

Performance & Corporate

Councillor Roger Ramsey

Resources

Councillor Geoffrey Starns

Children's Services

***For information about the meeting please contact:
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Cabinet, 19 September 2007

AGENDA

1 ANNOUNCEMENTS

On behalf of the Chairman, there will be an announcement about the arrangements in case of fire or other events that might require the meeting room or building's evacuation.

2 APOLOGIES FOR ABSENCE (if any) - receive.

3 DECLARATION OF INTERESTS

Members are invited to declare any interests in any of the items on the agenda at this point of the meeting. Members may still declare an interest in an item at any time prior to the consideration of the matter.

4 MINUTES

To approve as a correct record the minutes of the meeting held on 1 August 2007, and to authorise the Chairman to sign them

5 REPORT OF THE ENVIRONMENT OVERVIEW AND SCRUTINY COMMITTEE

6 STREETCARE ENFORCEMENT POLICY UPDATE

7 IMPROVING THE QUALITY OF LIFE FOR HAVERING – DEVELOPING THE COUNCIL'S CORPORATE BUSINESS PLANNING PROCESS 2008-11 – SUPPORTING STRATEGIES

8 PROPOSAL TO SEEK GOVERNMENT APPROVAL TO TRANSFER THE MARDYKE ESTATE TO OLD FORD HOUSING ASSOCIATION

9 SCHOOLS TRUSTS

10 HAVERING LOCAL DEVELOPMENT FRAMEWORK: ROMFORD AREA ACTION PLAN: APPROVAL OF SUBMISSION DOCUMENT

11 SOCIAL SERVICES BUDGET

Cabinet, 19 September 2007**12 EXCLUSION OF THE PUBLIC**

To consider whether the public should now be excluded from the meeting on the grounds that it is likely that, in view of the nature of the business to be transacted or the nature of the proceedings, if members of the public were present during the following item there would be disclosure to them of exempt information within the meaning of paragraph 3 of Schedule 12A to the Local Government Act 1972 which it is not in the public interest to publish; and, if it is decided to exclude the public on those grounds, Cabinet to resolve accordingly on the motion of the Chairman.

13 CHIEF EXECUTIVE'S REPORT CONTAINING EXEMPT INFORMATION

Cheryl Coppel
Chief Executive



MINUTES OF A CABINET MEETING
Havering Town Hall, Romford
Wednesday, 1 August 2007 (7.30pm – 7.55pm)
 (Postponed from 25 July 2007)

Present:

Councillor Michael White, Leader of the Council, in the Chair

Cabinet Member responsibility:

Councillor Andrew Curtin

Public Realm

Councillor Peter Gardner

Public Safety

Councillor Roger Ramsey

Resources

Councillor Paul Rochford

Environmental & Technical Services

Councillor Geoffrey Starns

Children's Services

Councillors Keith Darvill, Gillian Ford, Linda Hawthorn, Barbara Matthews and Ray Morgon,

Two members of the public and a representative of the press were also present.

Apologies were received for the absence of Councillors Michael Armstrong, Steven Kelly, Eric Munday, and Barry Tebbutt

Councillor Linda Hawthorn declared a personal interest in that she was related to an official of the Hornchurch Football Club.

All decisions were agreed with no vote against.

On behalf of the Chairman, those present were reminded of the action to be taken in the event of an emergency.

11 MINUTES

The minutes of the meeting held on 5 July 2007 were agreed as a correct record and were signed by the Chairman.

- 12 **COUNCIL COMPLAINTS PROCEDURE:**
A REPORT OF THE CORPORATE OVERVIEW & SCRUTINY COMMITTEE - COUNCIL COMPLAINTS PROCEDURE TOPIC GROUP
B CORPORATE COMPLAINTS – summary of views of Adjudication & Review Committee

Councillor Andrew Curtin, Cabinet Member for Public Realm, introduced the reports.

Cabinet received a report of the Corporate Overview & Scrutiny Committee, following a Topic Group study of the Council's Complaints Procedure. That report was accompanied by a collateral report of the Adjudication & Review Committee, as the Committee responsible for oversight of the operation of that procedure. The findings, conclusion and recommendations are set out in Appendix 1 to these minutes.

The Topic Group had reported that there were clear improvements that the Council could make in its complaints handling arrangements to improve services for customers and to provide Members and customers with more information about the complaints received and the action taken. The use of technology needed to be improved and more training made available for staff. Better monitoring information needed to be produced for Councillors. Some proposals for improvement were set out in the report, some of which would have financial implications, and the findings, conclusions and recommendations are set out in the appendix to these minutes.

The Adjudication & Review Committee had also received and considered the Topic Group's report, and had wholeheartedly endorsed it, and now commended it to Cabinet. The Committee had welcomed the report as a useful contribution to its own plans to improve the Council's handling of complaints and to make Services more responsive to customers' needs, which it would be considering in the autumn. Cabinet now noted the Committee's view that the greater availability of Customer Relationship Management (CRM) software and the more focussed approach to handling complaints through a central team would greatly assist the Committee in implementing the extensive changes that it had in mind.

Reasons for the decision:

The Corporate Overview & Scrutiny Committee Topic Group report on the Council's complaints procedure had been referred to Cabinet for consideration.

Other options considered:

No alternative had been considered.

Cabinet agreed:

- 1 Having considered the Corporate Overview and Scrutiny Committee topic group's report, to approve the recommendations contained in it for consideration against other priorities in the 2008/09 MTFS process, except where they can be funded from within existing budgets.
- 2 To accept the endorsement of the Adjudication and Review Committee as further evidence of the strength of feeling that funding should be made available for the implementation of the report.
- 3 That a detailed report, setting out arrangements for implementation, be presented by December 2007.

13 **NEW GROUND SHARING AND MANAGEMENT ARRANGEMENTS AT THE HORNCHURCH STADIUM**

Councillor Linda Hawthorn declared a personal interest, in that she was related to an official of the Hornchurch Football Club.

Councillor Andrew Curtin, Cabinet Member for Public Realm, introduced the report.

Cabinet was advised that, in order to maximise usage of the Hornchurch stadium and to establish new management arrangements that would benefit both the users of the facility and the Council as the landlord, a new approach to management of the stadium was now proposed.

Initial opposition to the proposals by the three sports clubs that were likely to share the use of the stadium (AFC Hornchurch [the Hornchurch football club], Romford Football Club and Havering Mayesbrook Athletics Club) had largely been overcome following extensive negotiation. The intention was to establish a not-for-profit trust that would manage the facility, with the three sports clubs having use of various facilities on terms to be agreed. The Council would retain ultimate control of the stadium.

Cabinet noted the content of a consultants' report on the future for the stadium.

Reasons for the decision:

To maximise usage of the Hornchurch stadium and to establish new management arrangements that would benefit both the users of the facility and the Council as the landlord.

Other options considered:

The following options had been considered -

- a) To allow the existing management and usage arrangements to continue – this had been rejected because it would not maximise usage of the site, would result in less rental income being achieved by the Council, would allow the unsatisfactory management arrangements to continue (in terms of the Council's role as landlord) and it might put the future of Romford FC in doubt as they did not currently have a permanent home ground.
- b) Curtail AFC Hornchurch's use of the stadium – this had been rejected because the Council would not wish to undermine the success that AFC Hornchurch had achieved, nor the youth activities that they manage. It had been recognised that AFC Hornchurch have improved the facilities and improved management arrangements at the stadium in recent years. Also, they did not currently have an alternative venue to play home matches if their use of the stadium was curtailed. Cabinet noted, however, that if AFC Hornchurch were actively seek to obstruct the proposed ground-share arrangement, this option might have to be reconsidered.
- c) Not to progress the proposal to set up a not-for-profit Trust to manage the stadium – this had been rejected because it was the option that was least likely to achieve the Council's objectives and to protect the interests of all the clubs based at the Hornchurch Stadium, in the medium/longer term.

Cabinet agreed:

- 1. To proceed with implementing ground share arrangements at the Hornchurch Stadium, involving shared use of the football facilities for the 2008/09 football season, by AFC Hornchurch and Romford FC.**
- 2. To note that Havering Mayesbrook Athletic Club's use of the Hornchurch Stadium is not directly affected by the proposed football related ground sharing arrangements.**
- 3. To set up a not-for-profit Trust, to manage the Hornchurch Stadium under a lease arrangement with the Council, to involve involving representatives of user clubs, the local community, the Council and other stakeholders.**
- 4. To agree that the Council retains overall control of the stadium site.**
- 5. To agree that all outstanding issues associated with the current use of the site need to be resolved before parties are eligible to be part of the Trust.**
- 6. To agree that if either of the football clubs chooses not to be part of the Trust they will not be allowed to use the stadium facilities and that the Council will look to find alternative partners to use the Stadium.**

7. **To delegate authority to the Cabinet Members for Public Realm and for Resources to finalise financial and legal issues as necessary and where possible.**

14 **A PLAY STRATEGY FOR HAVERING 2007-2012**

Councillor Andrew Curtin, Cabinet Member for Public Realm, introduced the report.

Cabinet was invited to approve a draft Play Strategy for Havering, which would provide a context and focus for Play in the borough and would also provide the means of accessing Havering's Big Lottery Fund allocation of £467,627.

It was noted that the Play Strategy would be set within the overall strategic framework for Culture in Havering, the Cultural Strategy and its component sub-strategies.

The aims of the Play Strategy were to:

- Provide a strategic framework for the provision and management of Play in Havering for the next five years
- Provide a vehicle for the ongoing consultation with and decision making by children and young people
- Establish a clear sense of direction and provide a focus for resource allocation and action on the ground
- Maximise support for and advocate the benefits of Play within and outside the council
- Encourage continuing community and stakeholder involvement and partnership
- Contribute to the Havering Community Strategy 2002-2007 'Putting People First.'
- Underpin the future development of play and Havering's submission to the Big Lottery Fund and other partnership funding opportunities

The Strategy had the following themes:

- **An Assessment of Need** in terms of quantity, quality and accessibility
- **Consultation** by making contact with a wide range of stakeholders, particularly the Havering Play Partnership, and including council officers, children and young people and other play providers
- **Promotion and Partnerships** by continuing to consult and work with key stakeholders promoting the benefits of play and ensuring that adequate funding from in side and outside of the Council is secured for the development of play opportunities
- **Equality and Access** by developing policies, ways of working and facilities that will engender a feeling of safety and easy access to play opportunities in Havering

- **The Way Forward** setting out how the Council would measure its performance by means of performance monitoring and a comprehensive Action Plan

Reasons for the decision:

The approval and formal adoption of the Play Strategy would provide a context and focus for the play opportunities within Havering. Successful strategies not only provide strategic direction for council services, but also provide a framework for development of other agencies and the private and voluntary sectors. They also highlight opportunities for partnership working ensuring that the best use is made of available resources. The Strategy also demonstrates to external funding agencies the key priorities for the community.

Other options considered:

No alternatives have been considered. Without this Strategy the Council will not have a clear focus and agreed plan for improving the opportunity for play, nor will it be able to access the Council's allocation from the Big Lottery Fund.

Cabinet agreed:

1. **The Play Strategy for Havering, subject to final sign off by the Cabinet Members for Public Realm and for Environmental & Technical Services following final consultation with stakeholders.**
2. **That an application and portfolio of projects arising from the Play Strategy be submitted to the Big Lottery Fund by September 2007 in order to access the Council's allocation of £467,627**

15 **CLOCKHOUSE INFANT AND JUNIOR SCHOOLS – proposed amalgamation from 1 September 2007.**

Councillor Andrew Curtin, Cabinet Member for Public Realm, introduced the report.

The Council had been through a staged process of consultation about its proposal to amalgamate the current Clockhouse Infant and Junior Schools. A full report to Cabinet in May 2007 had set out the process and result of the consultation. Cabinet had agreed to proceed with the proposal and the next stage of that process had now been concluded and no objections have been received. Cabinet was advised that it was now able to make a final decision to proceed with the implementation of the proposal and create the single school from 1 September 2007.

Reasons for the decision:

It was Council policy to consult on the feasibility of amalgamation when a head teacher post in an infant or junior school became vacant for any reason. Having considered the preliminary case for the

Clockhouse Schools, the Council had decided that it would be beneficial to proceed to formal consultation on amalgamation.

Other options considered:

No alternative had been considered, as the only other option was to retain separate Junior and Infant Schools, contrary to policy.

Cabinet:

- 1 Approved the discontinuation of Clockhouse Junior School from 31 August 2007.**
- 2 Approved the prescribed alterations to Clockhouse Infant School so that from 1 September 2007 it becomes a 3-11 Primary School admitting 90 part time children at age 3 into the nursery and 90 full time pupils at ages 4 to 11.**

16 IMPROVING THE QUALITY OF LIFE FOR HAVERING - DEVELOPING THE COUNCIL'S CORPORATE BUSINESS PLANNING PROCESS 2008 - 2011

Councillor Michael White, Leader of the Council, introduced the report

The Council was committed to working with partners to improve the quality of life for all residents. The Community Strategy, Local Area Agreement, Corporate Plan and Medium Term Financial Strategy provided the means by which this would be achieved. The report now invited Cabinet to initiate the development of the Council's strategy further to improve quality of life from 2008 - 2011.

The report set out the Council's overall vision, objectives and priorities, which would be refined and developed over the coming months in the light of consultation with the public and key local organisations. Council services would also be business planning to deliver the vision, objectives and priorities within the financial resources set through the Medium Term Financial Strategy process.

The report also identified the supporting strategies that would be reviewed to ensure that all the Council's resources and assets were supporting the priorities.

Reasons for the decision:

To enable the Council to develop its corporate plan and budget as set out in the constitution.

Other options considered:

None. The constitution required this as a step towards setting the budget.

Cabinet:

- 1 Adopted the vision, ambitions and priorities.**
- 2 Agreed that the Council's strategies should reflect the vision, ambitions and priorities.**
- 3 Agreed that Services continue business planning to deliver the vision, ambitions and priorities.**
- 4 Noted the financial position and prospects.**

17 EXCLUSION OF THE PUBLIC

Cabinet decided on the motion of the Chairman that the public should be excluded from the remainder of the meeting on the ground that it was likely that, in view of the nature of the business to be transacted, if members of the public were present there would be disclosure to them of exempt information within the meaning of paragraphs 1-4 of Schedule 12A to the Local Government Act 1972 and it was not in the public interest to publish the information.

18 DISPOSAL OF LAND FOR SUPPORTED HOUSING SCHEME

Cabinet was invited to approve the terms proposed for the disposal of a property surplus to the Council's requirements for development.

The details of the property in question are set out in Appendix 2 to these minutes (containing exempt information and not available to the press or public).

Reasons for the decision:

A decision was required in order to approve the disposal of this Council asset to Circle Anglia and provide grant for its redevelopment into supported housing for vulnerable people.

Other options considered:

The option of retaining this site as existing sheltered housing provision was not considered viable.

Cabinet agreed:

- 1 That the property referred to in the report be sold to the Circle Anglia housing association group for £850,000.**
- 2 That approval of the final terms of the disposal be delegated to the Cabinet Members for Resources and for Housing & Regeneration, and thereafter the Property Strategy Manager, acting in consultation with the Assistant Chief Executive (Legal**

and Democratic Services,) be authorised to deal with all matters arising and thereafter to complete the disposal.

- 3 That, subject to approval of the Terms of Disposal, the Council grant fund Circle Anglia a maximum of £2,050,000, to be sourced from sale of that property and from future Right to Buy receipts or other Housing Revenue Account land sales.
- 4 That an addition of £2.05 million be made to the Capital Allowance established for social housing purposes under the current capital finance and accounting regulations

19 **INFORMATION, ADVICE AND GUIDANCE (IAG) ON CAREERS AND PERSONAL ADVISER SERVICE TO YOUNG PEOPLE CONTRACTS**

In January 2007, Cabinet had agreed a one year extension to the existing IAG Careers contract with the current provider "Future Careers Management", pending Government guidance following implementation of "Youth Matters and new Information Advice and Guidance standards", which would have implications for the delivery of Connexions IAG work and the issuing of contracts for Careers work in the future. That Guidance had now been received the Council was now able to create an IAG specification to comply with current Government policy initiatives.

The other element of Connexions was the targeted Personal Adviser (PA) service, which provided direct work with vulnerable young people, and which the Government had decided to transfer to local authorities by April 2008. It was proposed that that service should also be included within the procurement process.

Cabinet was, therefore, now invited to decide on the future of the existing contract against the options available to enable procurement to commence forthwith so that service delivery could begin in April 2008.

Reasons for the decision:

The extended IAG Careers contract would expire on 31 March 2008. Connexions Partnerships would then be dissolved and their statutory functions and duties transferred to local authorities. A decision was required now to ensure the fulfilment of statutory obligations and to enable the timetable for the procurement procedures to be completed by April 2008.

Other options considered:

Option 1: London East Connexions Partnership (LECP) to form a new company and the Council contract solely with them. This option would require justification for exemption from competitive tender as well as specific details on new company arrangements to be in place by 1 April 2008. There was inadequate evidence at this stage that LECP would have the ability to run IAG services directly as they presently have no track record of doing so. No details of any new company formation had been forthcoming from LECP. Any delay now about the

decision to commence procurement would force the Council into further extending the existing contract, which had an out-dated specification.

Option 2: to roll over the LECP and CFM contracts for up to two years on the basis that the market at the moment does not appear to be sufficiently mature to justify the cost of the exercise. This option had no real merit and only served to continue the unsatisfactory current arrangements.

Option 3: to bring all the Connexions functions 'in-house'. This option was not viable, given that services supplied by authorities and the Children's Trusts were increasingly subject to commissioning through external providers.

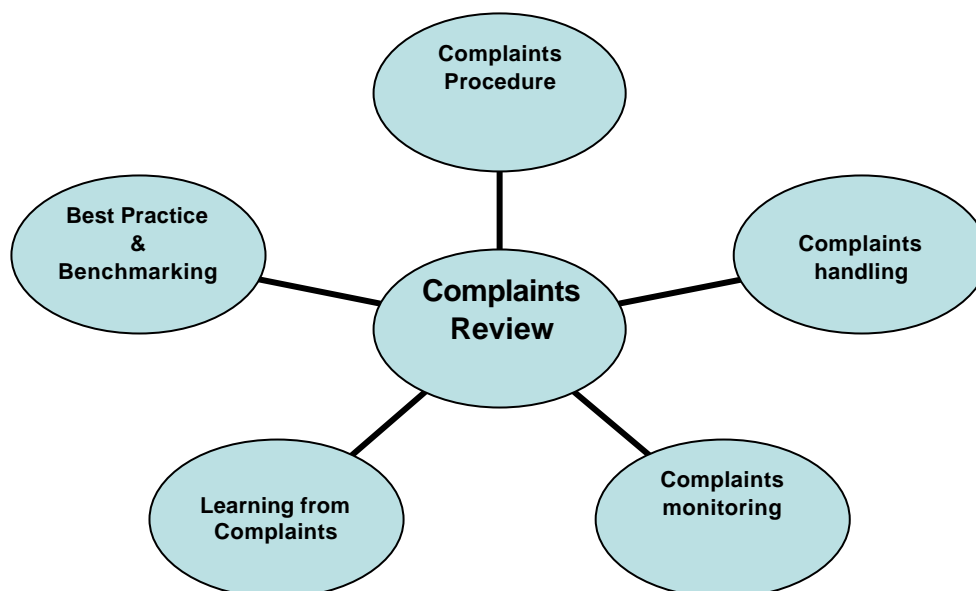
Cabinet:

- 1. Authorised the commencement of the procurement of the Careers Education Advice to Havering schools, colleges and alternative providers and the targeted Personal Adviser service to young people from April 2008 for 2 years with the option for a 1 year extension, the specification to be based on the new DfES Information Advice and Guidance (IAG) specification and the current service level agreement for the PAs with no contractual commitment being entered into until the resource implications are clear and match funding being made available.**
- 2. Agreed to retain centrally up to 10% of the grant for the provision of client contract management of the service and for the purposes of establishing and co-ordinating an Information, Advice and Guidance(IAG) partnership, subject to sufficient resources being left to meet legal requirements.**
- 3. Authorised the Head of Pupil & Student Services to approve the tendering timetable and the project risk assessment.**

**APPENDIX 1
(Minute 12)****REPORT OF THE CORPORATE OVERVIEW & SCRUTINY COMMITTEE -
COUNCIL COMPLAINTS PROCEDURE TOPIC GROUP****Findings and recommendations****FINDINGS****Introduction**

1 There are clear improvements that the Council can make in its complaints handling arrangements to improve services for customers and to provide Members and customers with more information about the complaints received and the action taken. The use of technology needs to be improved and more training made available for staff. Better monitoring information needs to be produced for councillors.

2 Set out below is the scope of the complaints handling review, key findings and recommended actions. The costs of implementing these recommendations are estimated at £60,000. In addition, additional resources are required for a Corporate Complaints Handling Team and it is anticipated that this will have an ongoing revenue cost of £60,000, though there may be an opportunity to combine resources within particular service areas.

Diagram1: Scope of complaints review

3 Set out below are the key findings in each area

- **Complaints Procedure.** There is presently a 3 stage complaints procedure in Havering and clear guidance as to how quickly complaints should be dealt with. There is some local variation in how the complaints procedure is publicised and applied. The number of telephone numbers that are published on the complaints leaflet should be reduced. For some services there is also a statutory complaints procedure and so separate guidance is produced. However, as far as possible this should be kept to a minimum.
- **Complaints handling.** In Havering responsibility for dealing with the complaints is largely decentralised and different arrangements are in place across the Council. In some areas there are specialist complaints staff but not in all others. Clear responsibilities and arrangements should be put in place to address this.
- **Complaints monitoring.** At present there is limited complaints monitoring information provided to Members. This needs to be addressed and a target of January 2008 set for production of a monthly monitoring report for Members.
- **Learning from Complaints.** There is a range of examples across the Council of how the organisation has learned from complaints. This good practice should be rolled out across the Council and a more systematic arrangement for learning from complaints put in place.

Best practice and benchmarking

4 An analysis of the number of complaints referred to the Local Government Ombudsman was carried out. This indicated that the Council receives fewer Ombudsman complaints than the average London Borough but that it is broadly in line with the number received by other Outer London Boroughs.

5 Information from the Residents Survey 2006 indicates that the Council performs poorly in managing complaints. Only 25% of residents are satisfied with how the Council deals with complaints. This compares to a London average of 31% and an Outer London Borough average of 31% also.

6 A desk top review of best practice in dealing with complaints was undertaken. This was supplemented with visits by the Panel to Thurrock Council and the London Borough of Barking and Dagenham. An officer also visited London Borough of Newham in order to see what could be learned from their complaints system. All visits were very helpful in identifying areas for improvement and good practice. Members were particularly impressed by the openness of the Thurrock system to both staff and customers and by the emphasis placed by that Council on learning from complaints.

7 This indicated that organisations that are recognised as good at dealing with complaints have the following characteristics

- ◆ A single organisation-wide approach to dealing with complaints
- ◆ A culture that recognises the value of learning from complaints and managing and dealing with them in a transparent and open way
- ◆ Dedicated complaints staff to log complaints and chase progress
- ◆ Large and ongoing training programmes to assist staff in dealing with complaints effectively
- ◆ Staff empowered to deal with complaints effectively, and clear procedures for agreeing compensation and other redress
- ◆ There is a single computer system which is used by all areas of the organisation to monitor and manage complaints. Key features include the ability to scan documents and attach them to electronic files, good management information and the use of escalation management technology
- ◆ Clear evidence of senior managers valuing effective complaints handling and the information that this generates
- ◆ Clear documentation for customers about the complaints procedure
- ◆ Established mechanism for feeding back to customers on the outcomes of complaints and for measuring customer satisfaction with how complaints are dealt with.

8 Organisations that are perceived as poor at dealing with complaints.

- ◆ Have local or decentralised arrangements for dealing with complaints.
- ◆ Do not use ICT effectively to deal with complaints.
- ◆ View complaints primarily as a criticism and the volume of complaints recorded as a measure of poor performance.
- ◆ Do not have clearly established mechanisms for learning from complaints or measuring customer satisfaction with complaints handling.
- ◆ Do not have effective mechanisms for monitoring complaints.

CONCLUSIONS

Improvements are required to the Council's complaints handling arrangements. While there are areas of good practice within the Council, a

more structured and systematic approach is required if customer service is to be improved, Members are to receive the information they require and resident satisfaction with complaints handling is to increase.

RECOMMENDATIONS

It is recommended that:

1. it is noted that a detailed officer response to this report is being prepared.
2. the Customer Relationship Management (CRM) functionality to deal with complaints is adapted to more closely replicate the Thurrock system and is rolled out across the Council by 31 October 2007. The group has noted that CRM is already part of the Council's preferred organisation-wide computer solution.
3. detailed procedures for dealing with complaints are developed and these set out the different roles and expectations of those dealing with complaints. This should identify clearly within Groups who is responsible for dealing with complaints about particular services. This information should be made available to all members.
4. A monthly complaints monitoring report is developed for members by 1 January 2008.
5. A single centralised complaints team be established to receive, log and chase all telephone complaints from a single complaints number for the Council. The initial aim should be to achieve this via existing resources. Should this not be possible, a bid for appropriate additional funding should be made through the Medium Term Financial Strategy.
6. A training programme to promote the better handling of complaints should be developed for all staff.
7. Formal procedures should be put in place to ensure that learning from complaints does occur.
8. For all recommendations adopted by Cabinet, the relevant head of service to report back to the Overview and Scrutiny Committee at its first meeting after three months have elapsed since Cabinet adoption, giving an update on the implementation of these recommendations. The Overview and Scrutiny Committee to decide if further updates are needed beyond this.



MEETING	DATE	ITEM
CABINET	19 September 2007	5

Cabinet Member: Councillor Barry Tebbutt

**REPORT OF THE
ENVIRONMENT OVERVIEW & SCRUTINY COMMITTEE
TRADE WASTE TOPIC GROUP**

In accordance with para. 11(c) of the Overview & Scrutiny Procedure Rules, Cabinet was due to consider this report no later than 19 July 2007, 10 weeks from the day following the OSC meeting. In the event, it was not possible to submit the report within that timescale and so it is presented now as this is the next available meeting.

1. BACKGROUND

- 1.1 At its meeting on 19 September 2006, the Environment Overview & Scrutiny Committee approved the establishment of a Topic Group to examine trade waste in the Borough.
- 1.2 The following Members formed the Topic Group at its outset: Councillors Sandra Binion (Chairman), Andrew Mann, Steve Whittaker, Dennis Bull and Gary Adams. The Group was supported by Paul Ellis, Waste & Recycling Manager and Trevor Rockliff, Enforcement Officer from StreetCare.
- 1.3 The Topic Group met on five occasions and reviewed the possible opportunities and parameters for improving how trade waste is dealt with in Havering. The Topic Group has now reached its recommendations and findings, which are detailed in this report.

2. THE SCOPE OF THE REVIEW

- 2.1 The Topic Group first met on 25 October 2006 and confirmed that the scope of the Scrutiny was:
- 2.2 To scrutinise the policy and performance surrounding trade waste collection and storage in Havering.

3. GOOD PRACTICE

- 3.1 The Topic Group has sought examples of good practice to include in the review. To this end it has drawn upon a broad range of information sources in order to enhance its understanding of current strategies and innovative approaches to improve the way trade waste is managed in Havering.

4. FINDINGS

- 4.1 The collection of trade waste is a chargeable service provided under the Refuse & Recycling Contract and managed by StreetCare. Although the Council offers this service, so do a number of private waste disposal companies and businesses can select their own service provider or may choose to transport their own waste to a licensed disposal facility.
- 4.2 The Topic Group established that approximately 1500 of the Borough's businesses subscribe to the Council's Service - either hiring containers or purchasing trade sacks. A similar number are thought to have contractual arrangements with other licensed companies. This leaves a significant number (approximately 3500) of businesses whose arrangements for disposing of their trade waste are unknown.
- 4.3 There was concern that many of these businesses, where it appears no formal arrangements for trade waste are in place, could be fly tipping their rubbish. Members of the project group accompanied StreetCare Enforcement Officers on patrols to understand how proactive enforcement action can combat this form of waste crime.
- 4.4 The Topic Group was advised that fifty eight Fixed Penalty Notices (a one off fine of £75, £50 if paid within 14 days) had been issued since August 2006 to businesses whose waste had been found dumped on the public highway, and that many more warning letters have been issued for similar offences.
- 4.5 It is clear that robust enforcement action undertaken in accordance with the Streetcare Enforcement Policy has a key role to play in minimising the adverse impact incorrectly managed trade waste can have on the street scene and the Topic Group supported the production of a leaflet which will be distributed to all the Borough businesses with their business rates demand for 2007/2008. This leaflet clearly explains the 'Duty of Care' placed on each business to ensure their waste is stored and disposed of in accordance with legislation.

- 4.6 Currently, Trade Waste customers can only subscribe to an 1100litre Eurobin (approximately 12 sack capacity) or a sack collection. To give businesses more opportunity to containerise their waste and to reduce the number of sacks left on the highway for collection, the Topic Group recommended the introduction of a 360 litre wheelie bin (approximately 4 sack capacity) to the range of containers available. It was considered that these wheelie bins could be purchased by customers who would then contract for collections.
- 4.7 The Topic Group explored the financial position of the trade waste collection and disposal service and were advised that despite significant annual price increases over the last three years the trade waste service was still operating at a loss and that a further increase of in the region of 20% would be required in April 2007 to achieve a balanced trading account. Despite these increases Havering's charges will still be competitive when compared to those of private waste disposal companies including Veolia (formally Cleanaway) and the commercial division of Biffa. Havering's prices are also broadly in line with those charged by the other East London Waste Authority (ELWA) Boroughs.
- 4.8 The Project Group agreed that the service needed to be self financing but were concerned about the impact a 20% price increase would have on schools who subscribe to the service. The Group felt that recycling options available to schools should be fully explored and promoted.
- 4.9 The Group also felt that, following the April price increases referred to above, when the trade waste service will be on a secure financial footing, the service should be marketed with the joint aims of increased income generation and increasing the proportion of trade waste managed by the Borough; this would therefore less likely to adversely impact on the street scene in the form of fly tipping or litter. The Group was advised of the implications increased trade waste tonnages may have on ELWA's Landfill Allowance Trading Scheme (LATS) allocation which was introduced by the Government to ensure that the country meets its national targets for reducing the amount of biodegradable municipal waste that is sent for landfill, but that this was unlikely to be an issue until 2010 at the earliest, before which, a view could be taken regarding future service provision.

5. CONCLUSIONS

- 5.1 The Project Group concluded that once the trade waste service was operating on a cost recovery basis that a mid-range container be introduced and the service promoted.
- 5.2 The Group were also clear as regards the important role enforcement plays in the management of trade waste and supported the production of an educational 'Duty of Care' leaflet. Such a leaflet was produced and distributed with the business rate demand for 2007/08 and the Topic Group concluded that a similar leaflet should be circulated with the 2008/09 demand.

6. RECOMMENDATIONS

In order to address the above findings and conclusions, the Topic Group requests Cabinet to consider the following recommendations:

- 1) That a 360 litre wheeled bin service be introduced for trade waste customers at a price of £315 per year for a once weekly collection.
- 2) That the Council's trade waste service be promoted through the production of a sales brochure, via the Council's web site and through the Business Forum
- 3) To support the production and distribution of a 'Duty of Care' leaflet aimed at increasing awareness within the business community of their legal obligations regarding waste, and
- 4) That enforcement action continue to establish what measures businesses have in place to comply with their 'Duty of Care' obligations.
- 5) That all recommendations adopted by Cabinet, the relevant head of service to report back to the Overview and Scrutiny Committee at its first meeting after three months have elapsed since Cabinet adoption, giving an update on the implementation of these recommendations. The Overview and Scrutiny Committee to decide if further updates are needed beyond this.

7. ACKNOWLEDGEMENTS

- 7.1 The Topic Group wishes to place on record their thanks for the very positive approach displayed by officers that we have met during this review.
- 7.2 This report is presented by the Trade Waste Topic Group of the Environment Overview and Scrutiny Committee.

The following comments are submitted by members of staff:

8. Financial Implications and risks:

- 8.1 The 2007/08 review of charges supported a 20% increase in charges for the trade waste collection service. This increase, if current customer levels are maintained, will ensure that the service is self financing.
- 8.2 The Duty of Care leaflet was funded from the DEFRA Waste Performance Efficiency Grant for 2006/07. The 2007/08 Grant will be utilised to fund the promotion of the service via a brochure which will illustrate the service options available. Enforcement Officers will also indirectly promote the service during the course of their duties.
- 8.3 There is a risk that there will be customer resistance to another significant price increase. Should large numbers cancel this will impact on the trading account. It is

however predicted that increased business as a result of enforcement action and promoting the service will offset any lost income.

9. Legal Implications and risks:

9.1 The Council, as a Waste Collection Authority, has a duty to arrange for the collection of commercial waste if requested by the occupier of premises in its area.

10. Human Resources Implications and risks:

10.1 There are no specific Human Resource implications in this report.

11. Environmental risks and implications:

11.1 The management of trade waste, either through enforcement action or through the promotion of the Council's trade waste collection service, will positively impact on the environment and will reduce litter and fly tipping. The introduction of the 360 litre wheeled bin will increase containerisation of waste and will also reduce litter and bags on the public highway.

12. Equalities and Social inclusion risks and implications:

12.1 None.



MEETING

DATE

ITEM

CABINET

19 September 2007

6

Cabinet Member: Councillor Barry Tebbutt

Relevant Overview & Scrutiny Committee: Environment

This is a Key Decision

REPORT OF THE CHIEF EXECUTIVE

SUBJECT: StreetCare Enforcement Policy Update

SUMMARY

1. The Enforcement Team within StreetCare was established in the summer of 2005 and on 19 April 2006 Cabinet approved the StreetCare Enforcement Policy.
2. This report informs Members of how StreetCare enforcement has progressed and how effective enforcement action has contributed towards a cleaner safer Borough.
3. The report also advises Members that Havering are currently applying lower levels of fines in respect of "flexible" fixed penalties for StreetCare managed environmental offences than other London Boroughs and seeks approval to bring these into line with the higher levels levied by other London Boroughs.

RECOMMENDATIONS

That the Cabinet;

- 1 Notes the progress made in the implementation of the StreetCare Enforcement Policy and how this has contributed to a cleaner and safer Borough.
- 2 Agrees that the level of fines for “flexible “ fixed penalties for StreetCare managed environmental offences be brought into line with those of other London Boroughs as set out in Appendix 2.

REPORT DETAIL

1 Background

- 1.1 The Enforcement Team within StreetCare was established in the Summer of 2005 and on 19 April 2006 Cabinet approved the StreetCare Enforcement Policy.
- 1.2 A series of Enforcement Management Modules have been designed which complement the Enforcement Policy and provide officers with a step by step decision making process to support their professional judgement. Together these documents ensure that the principle criteria and practices of good enforcement are followed and where appropriate a policy of advice and warning is followed before more formal enforcement action is taken.
- 1.3 The Policy covers activities associated with nuisance vehicles, litter and fly tipping, fly posting and graffiti, dog fouling, commercial and domestic waste controls, damage to the Public Highway, compliance with Council licences, illegal signs and tree damage.
- 1.4 Prior to 2005 all StreetCare enforcement action was undertaken by Area Liaison Officers (ALOs), who also had a range of other duties to undertake, and had focused largely on advice and warning.
- 1.5 There is now a team of six Enforcement Officers who work with the ALOs to identify and address the wide remit of activities identified in section 1.3 of this report. It has been necessary to prioritise which activities, if addressed by measured enforcement action, would contribute most quickly to an improved environment, and it was decided that the focus should be on reducing fly tipping, waste and litter, and nuisance vehicle related issues, all of which impact on peoples perception of living in a safe and clean environment and contribute towards Best Value Indicator 199 which is CPA sensitive. The Enforcement Officers have focussed on these areas whilst the Area Liaison

Officers have continued to manage all aspects of Highways enforcement, seeking support from the enforcement officers where necessary.

- 1.6 The table shown as Appendix 1 illustrates the range and number of enforcement actions taken to address offences relating to waste , litter , and fly tipping and the impact that these , complemented by focused awareness raising campaigns and a proactive street cleaning regime have had on reducing the number of fly tips Borough wide. The increase in the range of methods employed to resolve problems during the first quarter of 2007/08 can be seen and this reflects the continuing development of the Policy and the progression to a more formal course of action where previous educational approaches have failed.
- 1.7 The number of fly tips on highways land Borough wide reduced by 23% between 2005/06 and 2006/07. In addition a focussed multi agency campaign based on the Enforcement Policy principles of advice, warning, enforcement was undertaken in the Gooshays Ward in the summer of 2006. This campaign was aimed at reducing fly tipping, graffiti and other forms of antisocial behaviour and involved the Gooshays Safer Neighbourhood Police Team, Homes in Havering, Community Safety, the local community and StreetCare enforcement officers working closely with the street cleansing service. This pilot project reduced levels of fly tipping within the Gooshays area by 51% and demonstrated the effectiveness of partnership working. Further partnership projects based on the Gooshays pilot will be coordinated.
- 1.8 Where advice and warnings fail to resolve a problem formal enforcement action is taken. During 2006/07 92 Fixed Penalty Notices were issued and over 91% of these were paid. In July 2007 Havering received formal confirmation from DEFRA that in relation to combating fly tipping the enforcement regime was assessed as “**very effective**”. This is the highest scoring grade in the BVPI and recognises the increase in enforcement actions measured against the decrease in fly tipping.
- 1.9 Where Fixed Penalty Notices are not paid prosecutions are pursued and on 12 July 2007 StreetCare officers secured their first prosecution in the Magistrates Court for waste related (Duty of Care) offences. The offender was fined £350 and ordered to pay £680 towards costs.
- 1.10 The DEFRA assessment and the graduated approach to more formal enforcement action, where educational approaches have been ignored, combined with the reduction in fly tipping and the 22% increases in customer satisfaction with street cleansing (as measured by MORI) all illustrate the progress being made. It is anticipated that this progress will continue as new powers are delegated to officers and with the introduction of covert CCTV systems in known fly tipping hotspots.
- 1.11 The performance in respect of abandoned and untaxed vehicle enforcement has also shown a marked improvement. This is illustrated in the following table :

	2005-06	2006-07
% of Nuisance Vehicles investigated within 24 hours	86%	96%
% of Nuisance Vehicles removed within 24 hours	78%	90%

- 1.12 Although waste and nuisance vehicle related problems have been the main priority many other issues within the StreetCare remit have been addressed and on 19 July 2007 a prosecution was secured against the proprietor of a business who continued to obstruct the Highway with his shop display despite numerous warnings. Businesses that obstruct the Highway with advertising boards continue to be warned and where this process has continued the boards have been removed. Fixed Penalty Notices are now also being issued for the offence of fly posting.
- 1.13 Abandoned shopping trolleys present problems in a number of locations in the Borough. In the majority of cases the supermarkets respond to requests for them to be collected. This is however not always the case and a public consultation exercise is being organised, in accordance with legislation, before a Council resolution is sought to enable Havering to remove the trolleys and charge the supermarkets for their return .The types of enforcement actions listed in this, and section 1.13 of this report will increase in coming months as procedures are further developed and priorities reviewed.
- 1.14 The Enforcement Team will also continue to work with residents, Homes in Havering, the business community, Community Safety, and the Safer Neighbourhoods Teams to identify areas of land that may not constitute public highway but impact on the local environment and contribute to a fear of crime either because of litter and waste issues or graffiti. Where the land owners do not respond to advice and warning litter clearance and graffiti removal notices will be served.
- 1.15 StreetCare are currently seeking delegated authority under the following legislation :

Clean Neighbourhoods & Environment Act 2005 part 6
Anti Social Behaviour Act 2003
Town & Country Planning Act 1990
London Local Authorities Acts 1990 to 2004
Traffic Management Act 2004
Local Government (Misc. Provisions) Act 1976

These delegations will enable officers to take enforcement action in respect of dog control orders to manage dog fouling and other issues, to penalise Highways Acts offences by Fixed Penalty Notices, to give different options for dealing with fly-posting and graffiti and to obtain information which would support enforcement action.

2 Fixed Penalty Notices – Level of Fines

- 2.1 The Clean Neighbourhoods and Environmental Act 2005 enabled local authorities to make greater use of Fixed Penalty Notices as an alternative to prosecution. Boroughs were provided with some flexibility in setting the amounts of penalties for some environmental offences. In Havering these were set in line with the DEFRA default levels.
- 2.2 During 2006/07 a London wide consultation exercise was undertaken, co-ordinated by London Councils, (the then ALG), to explore the merits of having London wide agreed Fixed Penalty levels in place. The merits of the approach were recognised and the table shown in Appendix 2 illustrated how the levels currently applied in Havering differ from those imposed by other London Borough.
- 2.3 Members will note that the levels currently set by Havering are slightly lower than those imposed by other Boroughs and are recommended to agree that these are brought in line to support a common London wide approach.

3 Financial Implications and Risks

- 3.1 In 2007/08 there is an income budget of £46,000 in respect of additional enforcement activity included within overall StreetCare budgets. The actual income received in 2006/07 was £3,425. Whilst the increase in the fines associated with Fixed Penalties will assist in achieving the current year's budget, it is also likely that over a period of time, effective enforcement action will lead to increased income from sales of trade waste sacks and a number of new commercial waste contract customers. Ultimately though, effective enforcement action is intended to reduce environmental crime and could therefore impact on the number of fixed penalties issued and subsequent income. This should however be viewed as positive as a compliant and well informed community will contribute to a cleaner environment.
- 3.2 Advice and awareness campaigns and proactive enforcement action in respect of waste management have also contributed to an increase in trade waste income. This has helped to off set other financial pressures in this area and move the trade waste service towards a balanced trading position in 2007/08.

4 Legal Implications and Risks

- 4.1 The prescribed range of penalties that can be imposed is set by DEFRA. The proposal in this report is that the Council imposes the maximum amount possible under the current regulations.

5 Human Resources Implications and Risk

- 5.1 There will be no additional staff required, as a consequence of this report.

6 Reasons for the Decision

- 6.1 Effective StreetCare enforcement contributes to a safer and cleaner Borough and it is important that Members are informed of the progress being made in this area. By agreeing to adopt the level of Fixed Penalty Fines levied by other London Boroughs Havering will be supporting a consistent approach to financial penalties for environmental crime.

7 Alternative Options Considered

- 7.1 Havering could continue to issue fixed penalties at the current levels but it is felt that a London wide approach to levels of fines associated with Fixed Penalty Notices would be beneficial. Increased revenue will also contribute towards achieving our income budget referred to in section 3.1 of this report.

8 Equalities and Social Inclusion Implications

- 8.1 None Specific.

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CHERYL COPPELL
Chief Executive

Background Papers List

The StreetCare Enforcement Policy Manual

Appendix 1

Waste related enforcement action and the number of fly tips between 2005/06 and 2007/08 (1st Quarter)

StreetCare Enforcement Actions	2005/06	2006/07	2007/08 1 st Quarter
Investigations	2674	5038	973
Warning Letters	2483	3522	519
Statutory Notices			102
Fixed Penalty Notices		92	74
Duty of Care Inspections			43
Stop And Search			1
Formal Cautions			
Prosecutions			
Prosecutions			
Injunctions			
Number of Street Care Fly tips	2996	2309	622

Appendix 2

Table of offences managed by StreetCare under the Clean Neighbourhoods and Environment Act 2005 with flexible FPN levels

Offence	Legislation	London level of penalty	LBH level of penalty (currently set at DEFRA default level)	Increase	Recommended new LBH level of penalty
Litter	Sec 88 (1)EPA 90	£80	£75	£5	£80
Street litter control & litter clearance Notices	Sec 94A(2) EPA 1990	£110	£100	£10	£110
Distribution of free literature	Sch 3a & para 7(2) EPA 1990	£80	£75	£5	£80
Graffiti & Fly-posting	Sec 43 ASBA 03	£80	£75	£5	£80
Waste Receptacles	Sec 47ZA(2) EPA 1990	£110	£100	£10	£110
Dog Control Orders	Sec 59(2) CNEA	£80	Not in current Use	N/A	£80



MEETING

DATE

ITEM

CABINET

19 September 2007

7

Cabinet Member: Councillor Michael White

Relevant Overview & Scrutiny Committee: All

This is a Key Decision

REPORT OF THE CHIEF EXECUTIVE

**SUBJECT: IMPROVING THE QUALITY OF LIFE FOR HAVERING –
DEVELOPING THE COUNCIL'S CORPORATE BUSINESS
PLANNING PROCESS 2008-11 – SUPPORTING STRATEGIES**

SUMMARY

Cabinet received at the last Cabinet a report outlining the Corporate Planning Process for 2008.

This report advises Cabinet that the supporting strategies which support ensuring that all the Council's resources and assets are being used to support the priorities have been reviewed and are available on the Internet.

RECOMMENDATION

1. That Cabinet agree the supporting strategies as outlined in the report.
2. That Cabinet recommend to Council they adopt these strategies.

REPORT DETAIL

1. Cabinet, at the last meeting, agreed the Corporate Planning Process for 2008-2011.
2. The report set out that a number of core documents and strategies support this process. These are:

- **Medium Term Financial Strategy (MTFS)**

The MTFS summarises the Council's budget and identifies resource requirements for the next three years. It sets out the issues facing the Council. It aims to ensure financial stability, that resources are directed to priorities, that the Council adopts to the prevailing financial climate and that stakeholders and the wider community can see our plans for resources.

Although the strategy is developed as the year progresses, an annual refresh is done to reflect changes in priorities and background, national and local.

A number of elements have been included in this year's refresh. This includes reference to the outcome of the Lyons review into local government financing, and the potential impact of the Government's Comprehensive Spending Review. It also sets out the Council's priority areas for investment and its aspiration for Council Tax rises to be kept at or below 3.5%, and explains the further improvements made to the financial planning process. This helps to ensure that Council resources are directed towards community priorities.

- **Capital Strategy**

This sets out the Council's approach to capital investment in the medium term and ensures that its capital resources are carefully planned and help the achievement of its priorities. The strategy is supported by the Capital Asset Management Plan which sets out the overall approach to the maintenance of the Council's assets. The refresh this year has streamlined the document and reflected that high level priorities are determined prior to detailed business case and prioritisation.

- **ICT Strategy**

This ensures that the Council is making best use of strategic technology to deliver its business needs. It builds on the good progress the Council has made towards electronic service delivery and ensures that required progress is maintained towards meeting the Governments Priority Service Outcomes and BVPI 157. The refresh this year has assessed the base requirements to maintain our existing infrastructure as well as identifying opportunities to improve systems for better services.

- **Workforce Plan**

This plan identifies the key challenges facing the Council over the next three

years in recruiting and retaining the workforce it requires to meet its priorities.

- **Risk Management Strategy**

The Council's well respected Risk Management Strategy is regularly reviewed by the Audit Committee. It includes outward, as well as inward, looking key risks. The risks are not an exhaustive listing, but those seen as being the highest priority to consider/address within corporate planning.

- **Other Supporting Plans and Strategies**

The Council has to complete a number of other plans and strategies to meet government requirements and local circumstances. These reflect the ambitions, priorities and objectives set out in the corporate planning process. They may need to be revisited as this process moves forward.

3. These documents are available on the Website at:

Risk Management Strategy:

http://www.havering.gov.uk/intranet/utilities/action/act_download.cfm?mediaid=5072

Procurement Strategy:

http://www.havering.gov.uk/intranet/media/pdf/0/d/ProcurementStrategy0609Version3_1.pdf

Capital Strategy:

http://www.havering.gov.uk/intranet/utilities/action/act_download.cfm?mediaid=10379

Medium Term Financial Strategy:

http://www.havering.gov.uk/intranet/utilities/action/act_download.cfm?mediaid=10378

ICT Strategy:

http://www.havering.gov.uk/intranet/utilities/action/act_download.cfm?mediaid=10692

4. Council will be asked to endorse these strategies as part of the 2008-2011 Corporate planning process.

Financial Implications and Risks:

The MTFs and Star Chamber process will ensure that financial implications and risks are fully met.

Legal Implications and Risks:

The Council's corporate planning process enables it to meet the challenges of any new legislation.

Human Resource Implications and Risks:

Plan addresses on-going implications and risks.

Equalities and Social Inclusion Implications and Risks:

As part of the service planning process these will need to be assessed.

Reasons for the Decision:

This enables the Council to develop its corporate plan and budget as set out in the constitution.

Alternative Options Considered:

None. The Constitution requires this as a step towards setting its budget.

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CHERYL COPPELL
Chief Executive

Background Papers

Strategy documents as identified in the report.



MEETING	DATE	ITEM
CABINET	19 September 2007	8

Cabinet Member: Councillor Michael Armstrong

Relevant Overview & Scrutiny Committee: Housing

This is a Key Decision

REPORT OF THE CHIEF EXECUTIVE

SUBJECT: Proposal to seek Government Approval to Transfer the Mardyke Estate to Old Ford Housing Association

SUMMARY

- 1.1 This report gives the results of the ballot of Mardyke tenants on the proposed transfer and the concurrent leaseholder consultation.
- 1.2 The report also seeks approval to apply to the Secretary of State for Communities and Local Government to transfer ownership of the estate to Old Ford Housing Association

RECOMMENDATION

- 2.1 That members note the clear mandate for transfer afforded by the very high turnout rate and clear vote among tenants in favour of transfer.

- 2.2 That an application to the Secretary of State for Communities and Local Government for consent to the transfer pursuant to sections 32-34 and section 43 of the Housing Act 1985 is made.
- 2.3 That authority to negotiate and conclude the terms of the agreement for the transfer of the Mardyke estate to Old Ford Housing Association, a prerequisite of the application to the Secretary of State, together with all supporting documentation including the proposed tenancy agreement for use by Old Ford Housing Association, the obligations for refurbishment and repair of the Mardyke estate and for wider community regeneration, any arrangements for any transferring staff under TUPE, nomination rights for the Council and the giving of any necessary warranties to Old Ford Housing Association and/or its parent group and/or funders be delegated to the Group Director – Sustainable Communities, acting in consultation with the Group Director – Finance and Commercial, and the Lead Member for Housing and Regeneration and Lead Member for Resources.
- 2.4 That an application to the Secretary of State for Communities and Local Government for gap funding for the regeneration of the estate is made.
- 2.5 That authority to negotiate with the Communities and Local Government department regarding the negative value of the estate, the public expenditure implications of the transfer and profile of gap funding draw-down by Old Ford Housing Association – all prerequisites of the gap funding application – be delegated to the Group Director – Sustainable Communities, acting in consultation with the Group Director – Finance and Commercial, and the Lead Member for Housing and Regeneration and Lead Member for Resources.
- 2.6 That agreement of any minor matters between the Council, and Old Ford Housing Association and/or the Communities and Local Government department necessary or expedient to secure the transfer, but not having a financial implication for the Council, be delegated to the Group Director – Sustainable Communities.

REPORT DETAIL

Background

- 3.1 This report represents the culmination of much work carried out by the Council since 2004 on developing its transfer proposals for the Mardyke estate in Rainham.
- 3.2 Cabinet has been kept informed throughout this process. At the meeting of 22 March 2005, Cabinet resolved to pursue the possible transfer of all tenanted and leasehold properties on the Mardyke estate to a registered social landlord following a test of opinion on the estate which found that more tenants favoured the transfer option compared with the Arm's Length Management Organisation approach. Subsequently, this was included in the Council's Options Appraisal submitted to the Government Office for London, GOL, in June 2005. GOL signed off the Options Appraisal in September 2005.

Cabinet, 19 September 2007

- 3.3 At its meeting of 14 December 2005, Cabinet delegated to the Lead Member for Housing and Regeneration, acting in conjunction with the Sustainable Communities Group Director, the authority to agree the Council's transfer and gap funding application to the then Office of the Deputy Prime Minister. This application was made on 31 July 2006.
- 3.4 Concurrent with this approach, the Council entered into a management contract with the Circle Anglia group to manage the Mardyke estate in advance of transfer. This contract came into force on 10 July 2006.
- 3.5 On 18 October 2006, the Communities and Local Government, CLG, department announced that a place on the Government's transfer programme had been made available for the Mardyke estate, pending negotiation on the gap funding requirement.
- 3.6 On 17 January 2007, Cabinet approved commencement of stage one of the formal consultation with tenants, that is, the issuing of the Tenants' Transfer Offer and a Leaseholder Consultation Document.
- 3.7 On 5 July 2007, Cabinet, having considered the representations made by local residents during stage one of the formal consultation, approved commencement of stage two of the formal consultation, including the ballot of all tenants eligible to vote, and a concurrent consultation exercise with leaseholders.
- 3.8 The tenant ballot and leaseholder consultation exercise then took place between Friday 6 July and Friday 3 August 2007. This constituted the statutory 28 day stage two period.

Outcome of the tenant ballot

- 3.9 The ballot of tenant opinion was run independently by Electoral Reform Services. The question presented to tenants was that agreed by Cabinet on 5 July 2007:

Are you in favour of the Council's proposal to transfer the ownership and management of your home to Old Ford Housing Association, part of the Circle Anglia group?

- 3.10 Tenants were invited to tick one of two boxes presented – 'yes' or 'no'.
- 3.11 In total, 455 tenants with secure or introductory tenancies were eligible to vote. A total of 364 voted, representing 80% of the electorate. There were no spoilt or blank ballot papers returned. Of those voting, the votes cast were as follows:

Number voting YES	315	87% of the valid vote
Number voting NO	49	13% of the valid vote
	<hr/>	
TOTAL	364	100% of the valid vote

- 3.12 It is worth noting that the Mardyke turnout is higher than that recorded by all successful partial stock transfer ballots in London held since 2001, excluding those relating to sheltered housing or very small estates with fewer than 200 properties. In officers' opinion, this demonstrates the very high level of community engagement forged by the consultation process and underlines the certainty with which members can consider the 87% 'yes' vote to reflect tenants' true opinion.
- 3.13 It is also worth bearing in mind that the 315 tenants voting 'yes' to transfer represent some 69% of all 455 tenants eligible to vote. Therefore, it is true to say that an absolute majority of all tenants favour transfer by a margin of more than two-to-one.

Outcome of the leaseholder consultation

- 3.14 Though not a statutory requirement, on 5 July 2007, Cabinet approved a consultation exercise to elicit leaseholders' views on the transfer. This leaseholder consultation was also conducted by Electoral Reform Services during stage two of the formal consultation. Leaseholders were asked:

The Council is proposing to transfer the ownership of the Freehold of your home to Old Ford Housing Association, part of the Circle Anglia group. Are you:

- very supportive*
- supportive*
- not very supportive*
- not at all supportive*

- 3.15 Of the 60 leaseholders, 35 returned a questionnaire; a response rate of 58%. One questionnaire was spoilt / blank, leaving 34 valid responses. Of these, the results were:

VERY SUPPORTIVE.....	20	59% of the valid vote
SUPPORTIVE	8	24% of the valid vote
NOT VERY SUPPORTIVE ..	3	9% of the valid vote
NOT SUPPORTIVE.....	3	9% of the valid vote
	<hr/>	
TOTAL	34	100% of the valid vote

- 3.16 Taking the 'very supportive' and 'supportive' results together, it can be seen that 82% of leaseholders taking part in the consultation are in favour of the transfer.

Timing of the transfer application

- 3.17 This report recommends that, given the strength of support for transfer evidenced by the tenant ballot, an application is made to the Secretary of State for Communities and Local Government to transfer the Mardyke estate to Old Ford Housing Association.

- 3.18 The CLG's transfer guidance prescribes the process for doing this along with the necessary documentation. The key documentation consists of:
- the transfer contract, often referred to as the 'transfer agreement', between the Council and receiving housing association
 - the tenancy agreement onto which tenants will transfer
 - details of the value of the estate and the public expenditure implications of the transfer stemming from the Single Transfer Model.
- 3.19 The CLG requires the transfer application to be made at least six weeks prior to the date consent is required. Given the imperative to complete the transfer within 2007/08, see the Finance section below, the following timetable has been set:
- 14 December 2007 – initial transfer application made to CLG
 - 22 February 2008 – transfer application and all related issues / application, such as the gap funding application, agreed by the CLG
 - 17 March 2008 – actual transfer.
- 3.20 The Housing and Environmental Service already retains the services of external financial and legal consultants and has clear working arrangements with internal partners. Thus, the Service is confident of meeting this timetable for transfer, subject the points raised below in paragraphs 3.22 – 3.25.

The potential impact of the wider regeneration of the Mardyke estate and Mardyke Farm

- 3.21 Members will be aware that the green belt land immediately to the north of the Mardyke estate, known as Mardyke Farm, is subject to a proposed green belt boundary revision in the Council's draft Local Development Framework, LDF. Should the Inspector currently examining the LDF accept the case for revising the boundary, there is potential for a far larger regeneration scheme.
- 3.22 The site specific allocation for the Mardyke Farm and Mardyke estate, itself the subject of examination by the LDF Inspector later this Autumn, requires that any housing development on the Mardyke Farm incorporates the fully integrated re-provisioning of the Mardyke estate.
- 3.23 It is expected that the LDF Inspector's findings regarding green belt sites across the borough, including Mardyke Farm, will be known this Autumn, before the anticipated date for first submission of the Mardyke estate transfer application to the CLG. Thus, it may be the case that a more comprehensive transfer agreement incorporating the necessary provisions for ensuring the regeneration of the Mardyke estate within the wider scheme, and within a reasonable timescale, needs to be developed.
- 3.24 Once the outcome of the LDF inspection is known, it may be that the Council will wish to reconsider the overall timescale for submission of the transfer application. If this were the case, however, there is a danger that the estate

will not transfer in 2007/08. This in turn will have a negative impact on the Housing Revenue Account, HRA. There may be benefits to the Council of amending the timescale to add to the Council's 'bargaining' position with regard to planning negotiations, although there would be a cost to the HRA in terms of income loss.

- 3.25 If a diversion from the timetable presented in paragraph 3.19 is proposed, Member approval of any agreement or agreements that would have a significant impact on the Council's resources and/or timing of the redevelopment of the Mardyke estate will be sought in the future if and when required.

4. Financial implications and risks

Costs associated with the transfer process

- 4.1 The costs associated with preparing the transfer documentation and associated consultancy advice can be met within the HRA resources in 2007/08. There is, however, a possibility of greater legal costs should a transfer agreement based on a wider regeneration across the Mardyke estate and Mardyke Farm need to be drawn up. The Head of Housing and Environmental Health Services is satisfied that sufficient resources for this are available from HRA reserves should they be needed. The transfer budget is monitored on a monthly basis as part of the robust HRA monitoring process conducted by Housing and Environmental Health Services and Finance.

Revenue implications of the date of transfer

- 4.2 The HRA budget approved by Cabinet at its meeting of 14 February 2007 was based on an assumed transfer date of 2 October 2007. Transfer is now anticipated at the end of March 2008 at the earliest. This amended date will have a positive impact on the HRA in 2007/08. The Head of Housing and Environmental Services is working closely with Finance to amend the budget accordingly, although the guiding principle is that additional resources will be used in the following tiered approach; (a) for additional unforeseen transfer costs, (b) for unavoidable expenditure by either the Housing Service or Homes in Havering, then (c) held in reserve to 'cushion' the negative impact of transfer in 2008/09 resulting from the workings of the HRA subsidy system.
- 4.3 At its meeting of 5 July 2007, Cabinet considered the impact on the HRA of the timing of the actual transfer. To summarise the information presented in the report of 5 July, as Havering Council is in negative subsidy, the Council in fact pays housing subsidy to the government, rather than receiving subsidy from the government. Thus, as the Council reduces its stock holding it pays less subsidy to government, rather than, as may be expected, receiving a lower subsidy payment. With the transfer of the Mardyke estate, the subsidy paid to the government will drop.
- 4.4 The result of this is that delaying the transfer from just before the start of 2008/09 to just after would lead to a loss of £965,000 to the HRA in 2009/10. Clearly it is in the Council's interest to avoid this, although the loss reduces each day within the year the transfer is delayed.

- 4.5 The Head of Housing and Environmental Services when developing HRA projections in consultation with Finance colleagues shall have due regard for the likely availability of resources in the event of a delayed transfer.
- 4.6 Member approval of any agreement or agreements that would have a significant impact on the Council's resources and/or timing of the redevelopment of the Mardyke estate will be sought in the future if and when required.

Capital implications

- 4.7 For purposes of housing transfer, the Mardyke estate has a negative value. Simply put, the costs to regenerate the estate cannot be met from the receiving housing association's borrowings and rental income. This has been tested and accepted by the CLG which, as a result, made a commitment on 30 March 2007 to provide gap funding to Old Ford Housing Association of an amount commensurate with the £12.01m gap in the Single Transfer Model submitted by the Council.
- 4.8 The Council will work with Old Ford Housing Association to finalise the gap funding application based on the Single Transfer Model data already submitted to and accepted by the CLG.
- 4.9 As the Council will not have a receipt for disposal of the stock, there will be no liability falling to the Council for payment of an LSVT Levy, essentially the government's share of the surplus between the receipt and the debt repaid. Furthermore, it is understood that the Council has no over-hanging debt arising from the disposal of the Mardyke estate.

5. Legal Implications and risks

- 5.1 The ballot reported on in this report has been conducted in line with the requirements of the formal consultation process on proposed stock transfers detailed in section 106 of and Schedule 3A to the Housing Act 1985 (as inserted by section 6 of and Schedule 1 to the Housing and Planning Act 1986) and relevant guidance issued by the DCLG.
- 5.2 To effect the transfer of the Mardyke estate and its properties, the Council is now required to formally apply to the Secretary of State for Communities and Local Government for consent pursuant to sections 32-34 and section 43 of the Housing Act 1985 which deal with the disposal of land and tenanted properties, outside of the right-to-buy provisions, respectively.
- 5.3 The Council is required to draw up a transfer contract, otherwise known as a transfer agreement, with Old Ford Housing Association, the stock-receiving body. The content of and format for this agreement are prescribed in the CLG's Housing Transfer Manual 2005, as amended by its 2006 Supplement to the Housing Transfer Manual.
- 5.4 Though a well-established process, negotiation of the Mardyke transfer agreement is likely to be complicated by (a) the fact that it is largely a regeneration rather than refurbishment project, and (b) the possibility of regeneration over a wider area including the Mardyke Farm. In anticipation of

this, Housing and Environmental Health Services, acting in consultation with Legal Services, have appointed Ashurst Solicitors, specialists in housing regeneration matters. A protocol has been drawn up between Housing and Environmental Services and Legal Services governing and regulating the draw down of legal advice from Legal Services and Ashurst.

6. Human Resources Implications and risks

- 6.1 There are no London Borough of Havering or Homes in Havering staff who work the necessary hours on the Mardyke estate to incur TUPE implications
- 6.2 There is potentially a TUPE implication falling to Old Ford Housing Association from the possible transfer of cleaning staff from a third party contractor, Hamton's, to Old Ford Housing Association. There is no TUPE liability falling to the Council from this.

7. ICT Implications

- 7.1 An ICT project will be required to scope the requirements of data migration and implementation related to transferring the tenancy data from the Council's Anite Housing Management System to Old Ford Housing Association's system. Any additional costs for this will be met from Housing's budgets for stock transfer.

8. Reasons for the decision

- 8.1 Transfer of the Mardyke estate to Old Ford Housing Association is dependent upon application to, and approval from, the Secretary of State in the Communities and Local Government department. This report has laid out the actions required for this, along with the implications of this course of action. The report recommends the appropriate approvals and delegations to achieve transfer.

9. Alternative options considered

- 9.1 None applicable.

10. Equalities and Social Inclusion implications

- 10.1 Members of Havering's more socially excluded communities, notably residents with low incomes and those from black and minority ethnic communities, are over-represented on the Mardyke estate. Thus, the ultimate redevelopment and improvement of properties will have a positive impact of these communities' quality of life.

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Chief Executive

Background Papers List

Housing Transfer Manual, 2005 Programme:
Office of the Deputy Prime Minister

Supplement to the Housing Transfer Manual, 2006 Programme: CLG

Letter from Electoral Reform Services giving the breakdown of the tenant
ballot result and leaseholder consultation result.

Cabinet, 19 September 2007



MEETING

DATE

ITEM

CABINET

19 September 2007

9

Cabinet Member: Councillor Geoff Starns

Relevant Overview & Scrutiny Committee: Children's Services

This is a Key Decision

REPORT OF THE CHIEF EXECUTIVE

SUBJECT: Schools Trusts

SUMMARY

In certain of its provisions the 2006 Education and Inspections Act (EIA) takes further the trend towards autonomy for schools which commenced in 1988 with the Education Reform Act. This report examines the new role of the local authority as set out in the EIA, examines the issues which Trust Status presents and from its position of strategic community leadership sets out a proposed Council policy stance on Schools Trusts.

This is intended to help schools frame proposals for Trust Status which are likely to gain support and participation from the local authority and the communities it represents, including the Havering Strategic Partnership and the Children's Trust.

RECOMMENDATION

Cabinet is recommended to adopt the policy statement as set out in paragraph 9 and to instruct officers actively to engage with schools in encouraging and shaping diversity.

REPORT DETAIL

1.0 Introduction

1.1 Local authorities are required to find new ways to release the potential of partnership working among public private and voluntary agencies and be more focused on community needs and aspirations through greater involvement in defining priorities and making key choices about provision.

1.2 It is in this context that the Havering Strategic Partnership is established, delivering the Local Area Agreement priorities, and the Children's Trust as a particular arm of the Strategic Partnership with discrete responsibilities under the Children Act 2004.

1.3 The Education and Inspection Act 2006 furthers the trend of autonomy of schools and places them as strong partners with other local agencies in delivering community outcomes, in particular the well-being of children and young people. The National College of School Leadership has amended the professional standards for all headteachers to include community leadership as a key part of the role. This is a shift from the inward-looking focus on standards which typified the previous 10 years of government education policy which nevertheless retains relentless attention to standards. During the passage of the Act, the then Secretary of State said that the White Paper was all about driving up standards for the most disadvantaged children. It is this that the local authority should seek to see evident in the arrangements for local Schools Trusts.

1.4 This report sets out the new and strengthened duties of the local authority in respect of schools, describes the issues of Trust Status and goes on to propose that The Council adds value to the thinking of schools considering Trust Status by being clear about what it expects by way of outcomes for children and young people.

2.0 The new role of the local authority in respect of schools

- ***Education standards quality assurer***

2.1 School Improvement Partners, under the leadership of the Chief Inspector, have a role to monitor outcomes in schools, to challenge schools to continue to improve and to take action where improvement is needed. There is now a greater focus on schools which are outwardly good but relying on a strong intake rather than challenging that intake to achieve its full potential. There is less tolerance of a school struggling over a long period. Action is expected to be incisive and rapid to ensure that children and young people currently at the school are enabled to make the progress that is expected of them.

2.2 A wider range of formal interventions is now possible and stand alongside the external inspections of OFSTED. The first formal level is a warning letter and this would have followed earlier identification of concern and earlier voluntary intervention by inspectors. This may be accompanied by the appointment of

additional governors if this seems desirable. The second level of intervention is the withdrawal of delegation. This replaces the governing body with direct management by the local authority. The third level is to establish an Education Intervention Board, appointed by the local authority, with the task of making rapid improvements to a seriously failing school and leading to a different status once equilibrium is established. This new status would be Foundation, Trust or Academy. The most extreme level of intervention is closure. These powers of intervention do not apply to Academies.

- ***Advocate for children and young people***

2.3 The role of the Director of Children's Services and the Lead Member for Children is defined in the Children Act. It places children and young people central to their concerns. This is a move away from the previous arrangements in the relationship with schools where the local authority was expected both to represent the view of children and young people and their carers and to support schools. This conflict, or managed ambiguity, as it has been described, is challenged by the EIA.

2.4 The creation of 'choice advisers', the possible appointment of a 'virtual headteacher' for looked after children and the powers of placement of looked after children in the 'best' schools are all examples of that change in emphasis in the local authority role.

- ***Police admissions code of practice and assure fair practice on exclusions, attendance etc***

2.5 Local authorities are further expected to represent the interests of children and young people by policing the admissions code and challenging schools who propose admissions arrangements which do not comply. The local authority has a role in respect of exclusions to help schools adopt and maintain fair practices and has a role in improving attendance.

- ***Duty as commissioner of schools from a wider variety of providers through competition***

2.6 "A local education authority in England shall exercise their functions...with a view to a) securing diversity in the provision of schools and b) increasing opportunities for parental choice" (EIA)

2.7 This provision is a fundamental change in the relationship between the local authority and schools in its area. The greater autonomy for schools for the delivery of outcomes for children and young people is counter-balanced by a new role for the local authority to be the "commissioner of schools". It has a precise meaning when considering the establishment of a new school which now must be subject to competition. The need for a new school is created by demographic change but by extension it would seem sensible in the new regime to clarify with all schools the expectations the local authority has for both education and social outcomes (well-being) for children and young people. A local authority is not debarred from seeking to provide new schools itself but it is expected actively to encourage variety and diversity of provision. Hence the notion of competition for the provision of a new school when one is needed.

- ***Strategic manager of school places (over-rides site ownership issues)***

2.8 The local authority remains responsible for securing sufficient places in schools in its area and to take action when there is over-supply. This responsibility overrides the status of schools.

- ***Global resource manager***

2.9 Management of the Dedicated Schools Budget and servicing the Schools Forum remains a local authority responsibility. The latest government policy statements make clear that this responsibility will extend to post 16 provision, which was removed when the Learning and Skills Council were established in their present form. Further change is expected in these arrangements from 2009.

3.0 Trust Status

3.1 The Education and Inspection Act and accompanying government literature assert that the experience of foundation schools and academies supports the view that this model of school governance results in improved outcomes for children and young people. The evidence for this point of view is ambiguous and contested but sufficient for the government to have an ambition that all schools will be self-governing by 2020. DCFS publishes a document "Trust Schools: Key Facts" on its website which it frequently updates and the latest available version is appended (**Appendix 1**).

4.0 Ownership

4.1 A fundamental aspect of self governance is the ownership of assets. A Foundation School or Trust School owns the land and other assets the management of which falls to the governing body. It may, subject to certain constraints such as regulations regarding the disposal of playing fields, release those assets for reinvestment in the school. In the event of closure, responsibility for proposing what to do with the asset rests with the governing body. There is an underlying presumption that assets return to those who invested them, so if the local authority contributed the land and buildings these are returned to the local authority. In the event of no agreement to the governing body proposal, resolution lies with the School Adjudicator who may determine: that the land be transferred to the school's maintaining local authority; that the governing body, foundation body or trustees be permitted to retain the land; or require that the land be transferred to another maintained school. In addition the Adjudicator can determine payment of compensation to recompense a party for the value of their investment.

4.2 The fact that the asset is removed from the local authority has relevance in that it removes the ability of the local authority to sell one asset to improve assets held elsewhere, especially outside educational purposes. Ideally, the creation of Trusts should seek to preserve some ability by the local authority or a Trust in partnership to retain that ability in order to retain a sense of equity between those schools which are asset rich and others which are asset poor.

5.0 Capital Investment

5.1 The local authority retains responsibility for investment in new schools and for improving the existing stock, whoever is the owner (except for voluntary aided schools for which there is no change proposed). Devolution of capital direct to schools has changed the relationship and there is an internal review under way which will result in a change to mutual expectations for investment whereby schools take greater financial responsibility for maintaining the buildings. This has previously been a contentious issue with some few schools choosing to not maintain the fabric of the building resulting in a larger bill for the local authority at a later date. A simple example is that a wooden window, regularly painted, will last many tens of years. One left to deteriorate will become beyond repair within very few years.

6.0 Employment

6.1 Staff in a Foundation School with a Trust will be employed by the governing body and the governing body, rather than the Council is able to exercise all employer rights and has all employer responsibilities. Teachers employed remain subject to the National Conditions for teachers. The Trust is additionally able to employ its own staff. On acquisition of Foundation Status staff have the normal TUPE rights in respect of their employment contracts.

7.0 Governance

7.1 A Trust School is essentially a Foundation School(S) with a trust. A Trust is proposed by the Governing Body which can give to the Trust either a majority or minority of places on the schools new governing body, which remains separate and accountable to the Trust which is the owner of the assets and the employer of staff. The benefit claimed for this arrangement is that it creates a long term relationship with trustees which extend beyond the existence of the original partners to the relationship. This may be true, but it also embeds a perpetuation of a controlling interest by the original promoters which was a criticism of the Grant Maintained schools when first created. At least one third of governing body places must be given to parents.

7.2 In presentations the Commissioner of Schools presents the advantages of Trust Status as follows

- Make schools less like each other, unique brand, USP, meeting local context & needs.
- See schools as stronger coming through the process
- Will strengthen and sustain other partnerships through established governance with agencies, colleges, etc.
- Would give the trust charitable status, so enabling the school to bid for funding hitherto unavailable to them
- Trust – many different partners – including health, social care, business etc. as trustees

7.3 Local schools which have looked at the potential of Trust Status have identified a different set of benefits. These include:

- an opportunity to re-launch the school reinvigorated with strengthened purpose
- the potential for departure from some perceived constraints which exist by being part of a local authority
- a perception that if DCFS has discretionary funds for projects of various kinds it is likely to favour Trust Schools and Academies over community schools.

7.4 Additionally, a Trust can borrow money on the market in order to invest, so adding to the potential for capital investment in the borough.

7.5 In summary the disbenefits which seem to arise include:

- the potential for greater complexity in relationships;
- charitable status may bring opportunities for access to new funds but managing a charitable trust is not a simple activity and the Charity Commissioners can be quite demanding;
- over time a possible diminution of the strength of local relationships;
- the possibility that assets and other resources may be used with too narrow a focus on who may benefit from investment choices;
- the diminution of democratic influence over the affairs of schools, which together spend 60+% of local authority resources.

8.0 Models of Schools and Trusts

8.1 No models are pre-defined. DCFS has suggested that they may include proposals to increase diversity through different models of schools and schooling and different models of Trust.

Models of schools

- Curriculum changes
- Individualised progression instead of chronological progression
- Multi site provision, e.g. for specialist diplomas
- The creation of more faith schools, single sex schools
- Campus schools including from early years through to sixth form and beyond
- Internationalism
- New approaches to meeting the needs of pupils with disabilities

Models of Trusts

- Single school – single trust
- Secondary school and group of local partners (other secondaries, primaries, colleges)
- National partners model - around a particular theme- innovation in learning, ICT etc

8.2 Among the more adventurous ideas are:

- Garforth Community College is setting up a trust to enable it to become an international centre for further and higher education offering a residential component for foreign students.

- Monkseaton Community High School wants to become a research school, modelled on research hospitals and universities.
- Knowsley Council has significant deprivation and struggles with poor achievement. It is proposing to close 11 secondary schools, make changes to its primary provision and create 7 new learning centres. It is appointing a director for each centre which will lead provision and innovation for all aspects of learning through all stages.

8.3 Part of the Council's response to the Children Act has been to recognise that much can be delivered by local collaboration. To this end locality groups of schools have been formed and with these localities extended service schools are creating a range of opportunities for children and young people to be engaged across a wide range of activities. Children's Centres are being established in key locations. The PCT has arranged its community resources so far as they serve families and younger people in areas which relate to localities and the police have established ward based services deliberately designed to have a local presence.

8.4 There is still a long way to go to fully establish localities as functioning entities, analysing local need and commissioning services to meet that need but this is the direction of travel.

8.5 Much as the relationship between the local authority and individual schools can be defined through a commissioning agreement, so could a relationship between the local authority, through the Children's Trust and Schools Trusts which could be co-terminous with localities. This model could in some respects be similar to the Knowsley proposal.

8.6 Some authorities are considering two levels of Trust – one for groups of schools and other partners and another, overarching Trust or federation of Trusts. For Havering such a model could have a purpose to provide a single point of reference for strategic debate between schools collectively, the council, the Children's Trust and the Havering Strategic Partnership.

9.0 Havering's policy position regarding Trust Status

9.1 These benefits available and the potential for disbenefits can be moderated by the choices schools make in how they wish to set up trusts which take this report to its final section.

9.2 The test of whether a Trust is adding value depends on a range of factors which can be simply summarised.

- Does the Trust introduce new partners to the relationship which brings innovation and proved added value to the well-being of children and young people?
- Does the Trust bring partners together to enhance the well-being of all children and young people?

- Do children and young people have a strong voice within the Trust, collectively influencing the provision of services and decisions affecting them as individuals?
- Does the Trust have sufficient focus on the most deprived?
- Does the Trust enhance relationships with the Children's Trust and within Havering's Strategic Partnership?
- Is the size of the Trust sufficient to warrant the infrastructure needed for the operation of the Trust?
- Do the Trust and governing bodies of schools promote social cohesion in its strategic and operational decisions, especially regarding equitable use of assets and other resources?

10.0 The Policy Statement

10.1 Havering Council is committed to raising continually educational standards and improving the well-being of every child and young person. It welcomes initiatives which enhance this ambition, including the acquisition of Trust Status in which the local authority would wish to be active.

10.2 Trust Status is a further development of greater autonomy of schools which Havering sees as a strength in the context of a partnership of interdependence between schools and other partners in Havering Children's Trust sharing values and priorities.

10.3 The Council would wish to encourage the development of diversity, as part of a mixed economy of provision, and would wish to add value to Trust development by participating in creating Trusts in which:

- new partners come to the relationship which brings innovative and proven added value to the well-being of children and young people;
- partners commit to working together to enhance the well-being of all children and young people;
- children and young people have a strong voice, collectively influencing the provision of services and decisions affecting them as individuals;
- there is sufficient focus on the most deprived;
- relationships with the Council, Children's Trust and within Havering's Strategic Partnership are enhanced; and
- the size of the Trust is sufficient to warrant the infrastructure needed its operation.
- Partners in the Trust agree that achieving value for money, maximising asset values and investing any receipts from asset release should be for the benefit

of the whole community as an important component in achieving and maintaining community cohesion.

11.0 Financial Implications and risks:

11.1 The revenue impact is broadly neutral as Trust schools will be funded on the same basis as other schools from within the Dedicated Schools Grant.

11.2 Involvement of officers in making arrangements for Trust, membership of Trusts by officers and/or members and negotiations with Trusts could add significantly to costs and affect the capacity of the organisation

11.3 The council and Trust partners will need to consider the implications on capital accounting arrangements when the details are known.

11.4 The council has invested capital resources in accordance with its capital strategy. The risk of Trusts benefiting from this in the event of school closure rather than the whole school community is removed by an underlying presumption that assets return to those who invested them, so if the local authority contributed the land and buildings these are returned to the local authority. Where the local authority and governing body cannot come to an agreement on the use of the assets, resolution lies with the School Adjudicator.

11.5 There is a risk that some schools could benefit from asset sales which would remove the ability of the local authority to sell one asset to improve assets elsewhere. In creating a Trust the ability of the value of the assets to be used for the whole community should be preserved.

11.6 There is a further risk that improvements a school may make to its premises may not follow priorities in the council's overall strategic asset management plan.

12.0 Legal Implications and risks:

12.1 A Trust document would need to be drawn up but this is a cost and responsibility falling to the school(s). Model Trust documents may become available. The extent to which the Council wishes to support the creation of Trusts may affect capacity within legal services, or may require additional financial resources to purchase external legal advice and assistance. It is possible that external legal advice will be required because of potential conflict of interests between the Council and the schools/Trusts. The relevant land for each school will need to be conveyed to the appropriate Trust. The change in employer will be an improvement on the current situation where the Council is the employer but has no effective control of employer-employee relations for school staff. The introduction of Trust status will accelerate the current trend to more formal contract based relationships between the Council and individual schools.

13.0 Human Resources Implications and risks:

13.1 A Trust can be its own employer although the school staff are employees of the governing body. Trust status allows the governing body some discretion about

Cabinet, 19 September 2007

conditions of service. Teachers must still be paid in accordance with the School Teachers Pay and Conditions Document. TUPE transfer would be required.

14.0 Equalities and Social Inclusion Implications and risks

There is no reason to expect a negative impact. If Trusts truly reflect the needs of the local community one could expect positive impact

15.0 Reasons for the decision:

A clear policy statement from the Council will assist schools consider how to configure Trusts in a way which preserves and enhances the best aspects of school / local authority partnership to the overall benefit of local communities.

16.0 Alternative options considered:

None

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Chief Executive

Background Papers List

There are no background papers.

TRUST SCHOOLS: KEY FACTS

Trust schools are:

- foundation schools supported by a charitable foundation or “Trust”.
- part of the local authority family of schools, funded on exactly the same basis as other local authority maintained schools.
- able to employ their own staff, set their own admission arrangements, and manage their own land and assets.
- supported by the Trust through the appointment of governors to the school’s governing body.
- not uniform in nature. The members of the Trust might include education charities, further or higher education institutions, business foundations or community groups, for example. A Trust might work with a single school, a group of local schools or a network of schools across the country. The important thing is what’s right for the individual school.
- about building long-term relationships with partners and/or other schools for the purposes of raising standards and for the benefit of all pupils.

It will be for the school’s existing governing body to decide whether to acquire a Trust, who the members of that Trust should be, and whether the Trust should appoint the minority or majority of the governing body.

Myth busting:

- Trust schools will not receive extra state funding – nor will the Trust be expected to contribute financially to the school.
- Trust schools will not be able to introduce new selection criteria – like all other schools, they will have to act in accordance with the Admissions Code.
- No school will be forced to have a Trust. But acquiring a Trust will be one option for local authorities to consider when a school is failing.
- Becoming a Trust schools does not mean “opting out” of local authority control. Trust schools will need to consult their local authority before they acquire a Trust. The local authority can refer the proposals to the Schools Adjudicator for decision if it has concerns about the school’s consultation process or the impact of the proposals on standards.

- Trust schools will not be 'owned' by businesses – business foundations and other partners can support the school through a Trust and take a role on the governing body, but not take it over.
- Trust schools will still have to abide by the normal parameters of the National Curriculum and will be inspected by Ofsted like all other schools.
- Parents will have to be consulted where a school proposes to acquire a Trust, and at least one third of Trust schools' governing bodies will be made up of parents.

Trust Schools Division

September 2006

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MEETING	DATE	ITEM
CABINET	19 September 2007	10

Cabinet Member: Councillor Michael Armstrong

Relevant Overview & Scrutiny Committee: Culture and Regeneration

This is a Key Decision

REPORT OF THE CHIEF EXECUTIVE

SUBJECT: Havering Local Development Framework : Romford Area Action Plan: Approval of Submission Document.

SUMMARY

Excellent progress has been made in preparing the suite of documents comprising Havering's Local Development Framework (LDF). Following on from the Core Strategy, Development Control Policies and Site Specific Allocations this report brings forward the Romford Area Action Plan for approval for formal Submission to the Secretary of State.

The Romford Area Action Plan is a key part of Havering's LDF. It will guide change in Romford up to 2020 and promote and enhance its position as east London's premier town centre. It establishes a statutory basis upon which planning decisions can be made and builds on the extensive work that the Council and its partners have undertaken in preparing the Romford Interim Planning Guidance and recently launched Romford Urban Strategy.

As with the LDF Core Strategy, the preparation of the Area Action Plan has involved several key stages of public consultation the latest being on the Preferred Options Report. This report outlines the public consultation undertaken on the Area Action

Plan at the preferred options stage from August to October 2006 and includes a comprehensive assessment of all the representations submitted from the public and organisations (Appendices 1a and 1b).

The report recommends the approval of a Submission version of the Area Action Plan (Appendix 2). This document closely follows the approach Members endorsed in the preferred options document. Details are set out in this report of where changes are recommended compared to the preferred options stage.

Subject to Member approval, this will be submitted to the Secretary of State in November 2007. Independent Examination of the Submission version is scheduled for August-September 2008 and adoption as formal Council policy in April 2009.

It is recommended that, as with the Core Strategy at this stage, the Submission Romford Area Action Plan be adopted for the purposes of Development Control pending its formal adoption.

RECOMMENDATIONS

1. To recommend to the Council that the comprehensive assessment of responses received from the public and organisations on the preferred options (Appendices 1a and 1b) are approved and included in the Statement of Compliance.
2. To recommend to the Council that the Submission Romford Area Action Plan (attached as Appendix 2) be approved.
3. To recommend to the Council that a Proposals Map showing the designations and site allocations set out in the Submission Romford Area Action Plan be approved.
4. To authorise the Lead Member for Housing and Regeneration to approve the Final Sustainability Appraisal Report to accompany the Submission Romford Area Action Plan.
5. To recommend that Council notes the tests of 'soundness' and the commentary on how the Romford Area Action Plan complies with them (attached as Appendix 3). The Inspector will test the Area Action Plan against these tests at the examination before issuing recommendations in a binding report.
6. To recommend to the Council that the Romford Area Action Plan be considered in conjunction with and, where appropriate, complementary to Havering's existing UDP (adopted in March 1993) with the weight attached to each policy in the decision making process dependent on the nature and number of the representations received during the submission consultation period in accordance with the principles set out in the Government Guidance note 'The Planning System General Principles'.

REPORT DETAIL

The Local Development Framework and Romford Area Action Plan

Background

1. Havering's Local Development Framework (LDF) will be suite of planning documents to collectively guide the future planning of Havering until 2020. The Local Development Scheme (LDS) is a project plan setting a timetable for the production of all Local Development Documents in the LDF. The June 2007 LDS indicates that the Council will produce the following Development Plan Documents (DPDs):

- Core Strategy and Generic Development Control Policies
- Site Specific Allocations
- Proposals Map
- **Romford Area Action Plan**
- Joint Waste Plan
- Gypsies and Traveller Sites
- Preferred Sites and Preferred Areas for Minerals Extraction

In addition, the Council will produce an extensive range of Supplementary Planning Documents (SPDs).

2. Members will be aware that excellent progress has been made in the preparation of the Core Strategy and Generic Development Control Polices and Site Specific Allocations DPDs. The Core Strategy will provide the framework for all other Local Development Documents, including the Romford Area Action Plan, and will set out Havering's vision and objectives for the planning of the Borough until 2020. The Examination into the Core Strategy took place in July 2007 and the Inspector's binding report is expected in October 2007. Examinations into the Development Control Policies and Site Specific Allocations are scheduled for November 2007 onwards subject to the outcome of the Inspector's report on the Core Strategy.
3. The Romford Area Action Plan has been brought forward at an early stage in the LDF process to reflect the continuing priority that the Council and other stakeholders are giving overall to the regeneration of the town centre and the pressure for development which is being maintained. It sets out the policies and proposals to deliver growth, stimulate regeneration and protect Romford's assets. Overall, it will establish a statutory basis upon which planning decisions can be made. It reflects, and will build upon, the extensive work that the Council and its partners have undertaken in preparing Interim Planning Guidance and the Romford Urban Strategy. The Vision of the Area Action Plan is to promote and enhance Romford's position as east London's premier town centre, to make the town centre a vibrant place where an increasing number of people want to live and work, and to ensure that high quality

design-led development contributes positively to Romford's attractiveness as a commercial, cultural and residential town.

4. The Local Development Scheme says that the Council will provide the Submission Documents for the Romford Area Action Plan to the Secretary of State in November 2007 with a Public Examination expected in August or September 2008.

Purpose of this report

5. The main purpose of this report is to approve a version of the Romford Area Action Plan for formal Submission to the Secretary of State. It outlines the consultation responses received at the preferred options stage and highlights for Members those areas where, in the light of these comments and other issues, the recommended Submission version differs from the preferred options approved in July 2006. It seeks Member approval for a Proposals Map covering the area included in the Area Action Plan to show the designations and sites contained within the Romford Area Action Plan. A draft map will be available to view at Cabinet and a final proof for Council.

The process for producing the Romford Area Action Plan

6. Preparation of the Romford Area Action Plan has accorded with the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning Regulations 2004. It has involved a number of statutory phases and extensive consultation in line with the Council's adopted Statement of Community Involvement. In summary, the first step was the publication of the Issues and Options Report for consultation during April and May 2006 and this was followed by preferred options for the Area Action Plan and consultation on these from August to October 2006.

Content and structure of this report

7. The rest of this report is set out in four main sections as follows:
 - Summary of the consultation process on the preferred options
 - Changes recommended to produce the Submission Romford Area Action Plan
 - Review of the Sustainability Appraisal process
 - Next steps
8. The format, style and structure of this report closely follows that utilised for approval of the Submission Core Strategy in autumn 2006. The report highlights those few areas where the recommended Submission document encompasses a revised approach to that which was approved by Members at preferred options stage.

Summary of the consultation process on the Preferred Options for the Romford Area Action Plan.

9. In accordance with the Council's Statement of Community Involvement (SCI) the preferred options for the Romford Area Action Plan were the subject of consultation from 21st August to 6th October 2006 to satisfy Regulation 26 of the Town and Country Planning (Local Development) (England) Regulations 2004.
10. The consultation included :
- Publication of a questionnaire outlining the Council's preferred options. The questionnaire included space for respondents to include detailed comments in addition to responding to the preferred options;
 - Direct mailing and e-mailing of questionnaires (with covering letter) to all those on the Council's established Romford Area Action Plan database;
 - Distribution of questionnaires and the preferred options report to all Havering libraries, Public Advice and Service Centres, Mercury House reception, Romford Youth Zone, the Whitworth Centre, and Central Park and Hornchurch Leisure Centres;
 - On-line consultation via the Council's website; and
 - Direct mailing of the questionnaire and report to households that requested them.
11. The consultation was publicised in various ways:
- A report was presented to the July meeting of the Romford Town Area Committee;
 - Information displayed at Central Library in Romford;
 - A press release was issued and published on the Council website;
 - An advert in the 'Yellow Advertiser';
 - Articles were published in Living in Havering, Havering Business Focus, HAVCO Newsletter and on the Havering Talking Newspaper; and
 - Publicity on Time FM radio station.
12. A Statement of Compliance document is required as part of the Submission 'package' and will be a comprehensive encyclopaedia of all the consultation undertaken in preparing the Romford Area Action Plan. For Members' convenience, only those parts of the document dealing with the feedback at the preferred options stage consultation are appended to this report. Appendix 1 details the responses of members of the public to the preferred options questionnaire (Appendix 1a) and the representations received from organisations along with the Council's recommended response (Appendix 1b). (These will be respectively Appendices 11 and 12 of the final Statement of Compliance).

Questionnaire response

13. 124 questionnaires were returned by members of the public. The table below summarises the responses to the preferred options questionnaire.

Preferred Option	Support (%)	Do not support (%)	No response (%)
Connecting Romford			
ROM1A: Romford Station	94	5	1
ROM1B: East London Transit	65	30	6
ROM1D: Brewery Bus Station	85	12	2
ROM2B: Car Parking	85	10	5
ROM3A: Pedestrian Links	87	12	1
ROM3E: Cycle Routes	61	33	6
Cultural Destination Romford			
ROM4A: Respecting the historic environment	90	6	5
ROM4C: Market Place	75	20	5
ROM4E: Day and evening economy	90	7	3
Commercial Romford			
ROM5A: South Street	56	34	7
ROM5B: South Street (Use Classes)	87	9	4
ROM6A: North Street (Retail Core)	90	4	6
ROM6B: North Street (Retail Fringe)	77	16	6
ROM7B: High Street	89	1	10
ROM8A: The Brewery	88	5	7
ROM9A: Romford Office Quarter	57	35	8
Liveable Romford			
ROM11B: Housing Supply	61	29	10
ROM12A: Family accommodation	74	19	7
ROM13D: Affordable Housing	73	19	7
ROM14A: Greening Romford (Tree Planting)	92	1	6
ROM14B: River Rom	85	6	8
ROM14C: New Green Features and Spaces	93	0	7
ROM14D: Existing Green Spaces	93	1	6
ROM15A: Tall Buildings	47	44	9
ROM15B: Urban Design	88	1	10
ROM15F: Public Spaces	84	6	10
Site Specific Allocations			
Site 1: Angel Way	77	7	16
Site 2: Bridge Close	73	10	17
Site 3: Como Street	62	19	19
Site 4: 18-46 High Street	77	9	15
Site 5: 25-59 High Street	73	12	15
Site 6: Station Gateway and Interchange	77	10	14

14. The table shows that the questionnaire responses demonstrated significant support for the majority of the preferred options; in particular, the suite of options for 'greening' Romford, the redevelopment of Romford Station, respecting the historic environment, and the diversification of the day and evening economy. While there was less support for the Romford Office Quarter and the tall buildings preferred options, 57% of all respondents supported the former and the majority of those who expressed a preference supported the latter. Preferred options for the East London Transit, the

provision of cycle routes and new and larger retail units on South Street were not supported by 30–34% of respondents, although all did receive majority support.

Organisation responses

15. 15 organisations responded to the preferred options consultation and their comments and the Council's response are shown in Appendix 1b. There was general support for the preferred options but a number of particular issues and objections were raised, highlighted in Appendix 1b.

Recommended changes to the Preferred Options Romford Area Action Plan to prepare the Submission Document

16. The recommended Submission document is in Appendix 2. It is faithful to the policy approaches and sites contained within the preferred options document with the exception of a few areas where staff recommend changes in the light of consultation responses and/or issues that have arisen since the preferred options stage. The key recommended changes are as follows:

a) Romford Area Action Plan Vision and Objectives

17. It is recommended that minor revisions be made to the first point of the Vision of the Area Action Plan to reflect consultation comments from Donaldsons (representing the Cosgrave Property Group) and the recommendations of the Havering Retail and Leisure Survey (April 2006). This identified the need for additional floorspace in Romford town centre. This would be taken forward in the proposed new policy (ROM 10) on Overall Romford Retail Policy (see paragraph 23). The recommended new wording for the Vision statement [underlined] is:
 - Romford Town Centre, with the help of Romford Town Centre Partnership, will expand its retail offer to ensure its continued position as East London's premier town centre.
18. It is recommended that in the Objectives, the first point under Liveable Romford is amended to reflect consultation comments from Donaldsons (representing the Cosgrave Property Group) that market housing will be as important as affordable housing in ensuring a sustainable community. The recommended new wording [underlined] is:
 - To maximise the provision of high quality housing of all tenures in the town centre.

b) Romford Area Action Plan Policies

19. **All but two of the policies in the preferred options are being taken forward into the submission document.** However, a number of the preferred options are recommended to be slightly amended or amalgamated based on comments received during the consultation process and following

further officer discussions. Two new polices are also proposed. This is summarised in the following table:

Final Schedule of Policies and Site Specific Allocations

Submission Document Policy	Submission Document Policy Title	Preferred Options Policy was	Preferred Options Policy Title was
Connecting Romford			
ROM1	ROMFORD STATION GATEWAY	ROM1A	Romford Station
ROM2	EAST LONDON TRANSIT	ROM1B	East London Transit
ROM3	BREWERY BUS PROVISION	ROM1D	Brewery Bus Station
ROM4	PEDESTRIAN LINKS	ROM3A	Pedestrian Links
ROM5	CYCLE ROUTES	ROM3E	Cycle Routes
Not taken forward (see paragraph 20)		ROM2B	Car Parking
Cultural Destination Romford			
ROM6	RESPECTING THE HISTORIC ENVIRONMENT	ROM4A	Respecting the Historic Environment
ROM7	MARKET PLACE	ROM4C	Market Place
ROM8	DAY AND EVENING ECONOMY	ROM4E	Day and Evening Economy
Commercial Romford			
ROM9	ROMFORD: METROPOLITAN SHOPPING CENTRE	New Policy	
ROM10	RETAIL CORE	ROM5A ROM5C ROM6A	South Street South Street (Use Classes) North Street (Retail Core)
ROM11	RETAIL FRINGE	ROM6B ROM7B	North Street (Retail Fringe) High Street
ROM12	THE BREWERY	ROM8A	The Brewery
ROM13	ROMFORD OFFICE QUARTER	ROM9A	Romford Office Quarter
Liveable Romford			
ROM14	HOUSING SUPPLY	ROM11B	Housing Supply
ROM15	FAMILY ACCOMMODATION	ROM12A	Family Accommodation
ROM16	SOCIAL INFRASTRUCTURE	New Policy	
ROM17	GREENING ROMFORD	ROM14A ROM14C ROM14D	Greening Romford (Tree Planting) New Green Features and Spaces Existing Green Spaces
ROM18	RIVER ROM	ROM14B	River Rom

Submission Document Policy	Submission Document Policy Title	Preferred Options Policy was	Preferred Options Policy Title was
ROM19	TALL BUILDINGS	ROM15A	Tall Buildings
ROM20	URBAN DESIGN	ROM15B	Urban Design
ROM21	PUBLIC SPACES	ROM15F	Public Spaces
Not taken forward (see paragraph 21)		ROM13D	Affordable Housing
Site Specific Allocations			
ROMSSA1	ANGEL WAY	Site 1	Angel Way
ROMSSA2	BRIDGE CLOSE	Site2	Bridge Close
ROMSSA3	COMO STREET	Site 3	Como Street
ROMSSA4	18-46 HIGH STREET	Site 4	18-46 High Street
ROMSSA5	37-59 HIGH STREET	Site 5	25-59 High Street
ROMSSA6	STATION GATEWAY AND INTERCHANGE	Site 6	Station Gateway and Interchange

20. NOT TAKEN FORWARD INTO SUBMISSION DOCUMENT – Preferred Option ROM2B: Car Parking

Officers recommend that this preferred option - to consider the more efficient use of surface car parking in the town centre - is not taken forward into the Submission document. Comments received on this preferred option varied from support from Transport for London and London Travel Watch - who viewed this as a car restraint policy - to objection from the Government Office for London who thought the policy would increase the number of car parking spaces in Romford. Although the principle of this policy, which was designed to maintain public parking levels using less land, remains valid, at this stage it is not possible to identify which car parks could be developed in this way, and so officers recommend that this policy is not taken forward as it is dependent on future initiatives and reviews. However, the absence of this policy does not prevent more efficient use of car parking being made in the future if this considered appropriate based on the evidence available at the time. Members should note that car parking standards for new development are set out separately in Annex 5 of the Core Strategy and will apply to Romford town centre: they are not affected by this change.

21. NOT TAKEN FORWARD INTO SUBMISSION DOCUMENT – Preferred Option ROM13D: Affordable Housing

This preferred option was for the Core Strategy policy for affordable housing to apply in Romford town centre. Therefore no policy is being taken forward into the Submission document as CP2 in the Core Strategy will apply to Romford as well.

22. NEW POLICY – ROM9: Romford: Metropolitan Shopping Centre

The Havering Retail and Leisure Study suggests that to maintain its role as a metropolitan centre, Romford can accommodate up to 30,000 sqm of new comparison floorspace up to 2018. Based on the study and other comments

received at preferred options stage, officers recommend that this new policy be included in the submission document. ROM9 will set the overall retail policy for the town centre and emphasise and strengthen Romford's role in the retail hierarchy.

23. AMENDED POLICY – ROM10: Retail Core

This policy combines three preferred options [ROM5A, ROM5C and ROM6A] which all applied to the core retail areas of South Street and North Street. ROM10 will set out the policy for the whole of the retail core of Romford town centre, which covers The Liberty, The Mall, The Brewery and parts of South Street, North Street and High Street. Officers consider it a more straightforward and practical approach to have one overall policy for the retail core, although ROM10 will include detailed criteria applicable to South Street and North Street as set out at preferred options stage.

24. AMENDED POLICY – ROM11: Retail Fringe

This policy combines two of the preferred options [ROM6B and ROM7B] for North Street and High Street, which both proposed the revised designation of parts of these streets as fringe retail areas. ROM11 will set out the policy for all retail fringe areas in Romford town centre, which covers parts of High Street, North Street, South Street, Station Parade and Victoria Road and, in line with the approach to District Centres in the Core Strategy, allows for some flexibility with regard to non-retail uses at ground floor level. Officers consider it a more straightforward and practical approach to have one overall policy for the retail fringe rather than have separate policies for different areas of the town centre with the same retail designation.

25. NEW POLICY – ROM16: Social Infrastructure

The Government Office for London, and a number of members of the public responding to the preferred options questionnaire, highlighted the need for infrastructure provision such as healthcare and other community facilities in Romford town centre. This issue was also highlighted by Havering PCT and the NHS London Healthy Urban Development Unit (HUDU) in their comments to the Council on the Submission Core Strategy DPD and in discussions with officers prior to the Core Strategy Examination. Given the increasing population in the town centre and intention in the Area Action Plan to provide further homes in Romford, officers recommend that the Area Action Plan includes a policy which will enable the provision of social infrastructure, specifically health and education facilities, to meet additional demand.

26. AMENDED POLICY – ROM17: Greening Romford

This policy combines three preferred options [ROM14A, ROM14C and ROM14D] which proposed environmental and biodiversity improvements into one policy for 'greening' Romford town centre. ROM17 will include detailed criteria applicable to different schemes and areas of the town centre as set

out at preferred options stage, including 'Greening the Ring Road', tree planting and protecting and enhancing existing green spaces.

c) Site Specific Allocations in the Romford Area Action Plan

27. The detail for Site 5 (25-59 High Street) is recommended to be changed to:

- **ROMSSA5: 37-59 High Street**

In line with the preliminary findings of the Romford Conservation Area Appraisal, numbers 25-35 High Street have not been included in this site.

28. **ROMSSA6: STATION GATEWAY AND INTERCHANGE**

The boundary of Site 6 is recommended to be amended so that it excludes land to the east of South Street. This revision is recommended because of landownership difficulties on the land on the corner of Victoria Road and South Street and because the land north of the railway is within the Romford Office Quarter and will benefit from this particular policy designation (ROM14). In addition, it is also recommended that ROMSSA6 includes the Fitness First and Lidl sites on Atlanta Boulevard. These are currently low density, single use sites with substantial surface level car parking and their incorporation into ROMSSA6 offers the opportunity for a more appropriate level of development in line with the redevelopment of the Station area.

d) Implementation and Monitoring

29. A particular issue raised by a number of respondents (Government Office for London, the Greater London Authority, Barton Willmore and Donaldsons) during the consultation was the implementation and monitoring of the Area Action Plan. This is an important issue because it will be a key test of soundness at the submission stage (see paragraph 35). This issue has been addressed in section 11 of the submission document which includes new information on the implementation and monitoring of the Area Action Plan and which staff consider addresses respondents concerns.

Sustainability Appraisal of the Area Action Plan

30. The Sustainability Appraisal is a requirement that the Council has to satisfy under Sections 19 (5a and b) of the Planning and Compulsory Purchase Act. It helps to ensure that the Council promotes sustainable development through the integration of sustainability considerations in plan preparation. Ensuring that the Area Action Plan is underpinned by sound sustainability principles has been a key objective throughout its preparation. This has to be continued into the preparation of the Submission versions of these technical documents which support the plan.

31. The Final Sustainability Appraisal Report will bring together the environmental, social and economic baseline and Sustainability Appraisal Framework presented in the Scoping Report, the initial sustainability appraisal

of options, the sustainability appraisal of the preferred options, and an appraisal of significant changes within a unified report.

32. As with the Core Strategy, it is recommended that the Lead Member for Housing and Regeneration is authorised to approve the Final Sustainability Appraisal Report for the Romford Area Action Plan.

Next Steps

33. Regulation 28 of the Town and Country Planning (Local Development) (England) Regulations 2004, requires that Area Action Plans, Final Sustainability Appraisal Reports and Statements of Compliance are submitted to the Secretary of State for an Independent Examination with an Inspector appointed by the Secretary of State. The Independent Examination of the Romford Area Action Plan is scheduled to take place in August-September 2008.
34. As soon as is reasonably practicable after the documents have been submitted, the Council must make these available for inspection at the Council libraries, offices and leisure centres, and Public Advice and Service Centres, publish the documents on the Council website, send the documentation to the organisations and individuals on its Romford Area Action Plan database and publish details of consultation in an advert in a local newspaper. Officers suggest that consultation should take place from November 2007 for a total of seven weeks to allow for the Christmas and New Year holidays. Representations received during this period will be considered by the Inspector at the Independent Examination.
35. During the Examination the Inspector will be testing the 'soundness' of the Romford Area Action Plan against the tests of soundness presented in Planning Policy Statement 12 (Local Development Frameworks) before issuing recommendations in a binding report. The Submission Romford Area Action Plan has been prepared with regard to these tests. The soundness tests fall into three categories:
 - Procedural Tests;
 - Conformity Tests; and
 - Coherence, Consistency and Effectiveness Tests.
36. For Members information, the tests of soundness are provided in Appendix 3 and a commentary is provided to illustrate how staff consider that these tests have been met.

The role of the Submission Area Action Plan until adoption

37. Due to the extensive public consultation that has taken place in preparing the Plan, staff consider that it should be afforded significant weight as a material planning consideration. It is, therefore, recommended that in addition to its submission to the Secretary of State, it should be approved for Development Control purposes, including discussions with potential developers, pending

the formal adoption of the Area Action Plan in April 2009. This is consistent with the approach taken with the Core Strategy.

Financial Implications and risks:

38. The printing and postage costs of the consultation on the Submission documents will be met within the Development and Transportation Planning budget. The costs of the Independent Examination will be lower than the cost for an Inquiry under the former UDP system because the format of the LDF Examination is less 'adversarial'. As with the Core Strategy Examination in July 2007, the Council's case will be 'led' by staff and it is most unlikely that there will be a need for specialist legal representation. However, the Council will still be responsible for meeting the costs of the Inspector preparing for, and holding the Examination and then preparing his / her report. Based on the duration and expected costs of the Core Strategy Examination in July 2007, staff estimate that the likely costs may be in the region of £20K. There will also be a need to cover the cost of appointing a Programme Officer to arrange the Examination and assist the Inspector. The likely cost of this is in the region of £10-15K. It is recommended that these costs be met from Planning Delivery Grant funds held in the Development and Transportation Planning Group cost centre.

Legal Implications and risks:

39. The Submission Romford Area Action Plan has been prepared to satisfy Section 19 (1) and (2) of the Planning and Compulsory Purchase Act 2004 and Regulation 28 of The Town and Country Planning (Local Development) (England) Regulations 2004. The Council is required to submit this plan if it wants it to become part of the future development plan for the borough. It has already committed to do so as the Romford Area Action Plan is identified in the Council's approved Local Development Scheme. If it did not do so the ability of the Council to resist inappropriate developments would be weakened. The Final Sustainability Appraisal Report has been undertaken as part of the Sustainability Appraisal process which is necessary to satisfy European Union Directive 2001/42/EC, and Sections 19 (5) a and (5) b of the Planning and Compulsory Purchase Act 2004.
40. Section 20 of the Planning and Compulsory Purchase Act states that the purpose of the Independent Examination is to determine in respect of the Development Plan Documents whether they are 'sound'. The tests of 'soundness' are contained in PPS12. The Submission Romford Area Action Plan has been prepared with regard to these tests (see paragraphs 35 and 36). If a DPD is considered unsound by the Inspector he/she will issue a set of binding recommendations. The Council must incorporate any changes received by the Inspector and then adopt the DPD.

Human Resources Implications and risks:

41. Staff consider that this work can be delivered within existing staff resources.

Reasons for the decision:

42. Please see legal implications.

Alternative options considered:

43. The alternative options were considered in the Issues and Options Report (April 2006).

Equalities and Social Inclusion implications:

44. The aim of Havering's LDF, including the Romford Area Action Plan, is to protect and strengthen what is best about Havering, to create places of real quality which are enjoyable and fulfilling to live in and improve social, economic and environmental opportunities for the whole community. The Romford Area Action Plan will play a key role in achieving this.

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CHERYL COPPELL
Chief Executive

Appendix 1a

Romford Area Action Plan

Public consultation feedback on
the Preferred Options Report

September 2007

Havering's Local
Development Framework

Public consultation feedback on the Romford Area Action Plan Preferred Options Report (August - October 2006)

The Romford Area Action Plan (AAP) will form a key part of the Havering Local Development Framework (LDF). It will guide change in Romford up to 2020 and promote and enhance its position as east London's premier town centre. It establishes a statutory basis upon which planning decisions can be made and builds on the extensive work that the Council and its partners have undertaken in Romford town centre.

This report details the feedback from the public consultation on the Preferred Options Report which took place between 21st August and 6th October 2006. 26 preferred options were presented under four topic headings:

- Connecting Romford
- Cultural Destination Romford
- Commercial Romford
- Liveable Romford

In addition, six key sites in Romford town centre were identified as Site Specific Allocations for consultation.

Respondents were asked if they agreed or disagreed with the preferred options and Site Specific Allocations and to provide additional comments as appropriate.

Consultation methodology

The consultation was undertaken in the following way:

- Direct mailing and e-mailing to those people on our LDF database
- Distribution of questionnaires to libraries, council offices and leisure centres in the borough
- Direct mailing of the questionnaire to households that requested them
- On-line consultation via the Council's website

The consultation was publicised in various ways:

- Report to Romford Town Area Committee
- Display in Central Library throughout the consultation period
- A press release was sent out indicating the start of the consultation and was also featured on the front page of the LBH website throughout the consultation period
- Articles in Living in Havering, Havering Business Focus and the HAVCO Newsletter
- Havering Talking Newspaper
- Interview on Time FM radio station
- On-line consultation via the Council's website

Responses to the questionnaire

124 individual questionnaires were returned to the Council, 13 of these via the website, and the results are summarised below. Respondents who submitted their contact details have been added to the Council's existing LDF database and will be sent a copy of this report and further information as work on the AAP progresses.

15 organisations also responded to the Preferred Options Report and their comments have been recorded in a separate report.

All but two of the policies in the preferred options are being taken forward into the submission document. However, a number of the preferred options are recommended to be slightly amended or amalgamated based on comments received during the consultation process and following further officer discussions. Two new policies are also being taken forward. A full list of the Area Action Plan policies and Site Specific Allocations is included in Appendix 1.

Next stage

The comments received have been used to inform the preparation of the Submission Romford Area Action Plan which will be submitted to the Secretary of State in November 2007 and is scheduled to go to an Independent Examination in August - September 2008.

1. Connecting Romford

ROM1: Public Transport

The Council took forward three Preferred Options for public transport in Romford:

ROM1A: Romford Station

ROM1B: East London Transit

ROM1D: Brewery Bus Station

ROM1A: Romford Station

Our Preferred Option is to promote the redevelopment of Romford station to create a major transport interchange and improve the quality of the surrounding environment to provide a gateway into and from Romford.

ROM1A	Number of respondents	% of respondents
Support	116	94
Do not support	6	5
No response	2	1
Total	124	100 ¹

Additional comments

- The first priority should be Romford Station (what an eyesore). Being a regular user of buses in Western Road, whoever decided on the bus stops there had no consideration for the public (passengers), particularly the offices side. When alighting on that side you have to fight your way through the queue waiting for the buses. Walking in the road is dangerous!
- It would be useful in a survey of this type to ask how access to the town centre is achieved, i.e. car or public transport.
- More room should be given to bus stops - too many buses stop at one stop.
- Romford badly needs a Bus Station. Every other local town centre has one. Romford has by far the largest shopping centre and market in Essex and east London but no central bus station. Western Road has 17 buses stopping at one stop - chaos!
- Cars must have a drop-off point. 'Transport' includes private cars.
- A pity someone with a bit of foresight didn't take the opportunity when the old Coal Yard was demolished to build a proper Bus Station / Rail Interchange instead of the shambles we've got now.
- Entrance to Romford Station needs enlarging/developing. Get Network Rail involved.
- I fully endorse ROM1A to redevelop the station area.

¹ Percentages have been rounded up/down to the nearest whole number so may not equal 100.

- I would encourage the changes to the railway station, as would many others, plus also to the area around the station which currently has an 'unsafe' feel to it, especially late at night.

Response

94% of respondents supported the preferred option for Romford Station. This is being taken forward into the Draft Submission Document as **ROM1: Romford Station Gateway.**

ROM1B: East London Transit

Our Preferred Option is to welcome and promote the development of the East London Transit (ELT) route through Romford, the development of stops for ELT services and a possible transport interchange.

ROM1B	Number of respondents	% of respondents
Support	80	65
Do not support	37	30
No response	7	6
Total	124	100

Additional comments

- If ELT comes it will have to be accommodated in any case and therefore, in some way, will have a bearing on the redevelopment of the station.
- Without further background detail about ELT this question is meaningless.

Response

65% of respondents supported the preferred option for the East London Transit. This is being taken forward into the Draft Submission Document as **ROM2: East London Transit.**

ROM1D: Brewery Bus Station

Our Preferred Option is to ensure that any redevelopment of the Brewery scheme provides a more convenient and usable bus station facility.

ROM1D	Number of respondents	% of respondents
Support	106	85
Do not support	15	12
No response	3	2
Total	124	100

Additional comments

- Romford needs a proper bus station as it is scattered over the borough.

- Brewery Bus Station - this would stop so many cars in that area (and consequent queues on Ring Road). This would also be a boon to the older generation who can no longer use a car but find it hard to walk to Western Road when loaded with shopping.
- The 'Romford' Bus Station should be incorporated into the 'Major Transport Interchange' and included under ROM1A.
- Easier access for cars.
- Buses were promised when the Brewery was developed. Why have these promises not been kept? There is no town centre for Romford now. It has been fragmented into so many disparate sites, i.e. South Street, Liberty 1, Liberty 2, Market Place, North Street, Brewery that it is no longer a pleasure to shop in Romford. If it is intended to close the Shopmobility facility then shopping in Romford will be even more of a nightmare for older and disabled residents.

Response

85% of respondents supported the preferred option for the Brewery Bus Station. This is being taken forward into the Draft Submission Document as **ROM3: Brewery Bus Provision.**

ROM2: Car Parking

The Council took forward one Preferred Option for car parking in Romford:

ROM2B: Car Parking

ROM2B: Car Parking

Our Preferred Option is to investigate the potential for more efficient use of surface car parking in the town centre and that any redevelopment must ensure that the appropriate level of car parking provision is provided.

ROM2B	Number of respondents	% of respondents
Support	105	85
Do not support	13	10
No response	6	5
Total	124	100

Additional comments

- Prefer Romford town centre to be a pedestrian zone with car use kept to a minimum. Perhaps thought to be given to Park & Ride schemes. Car parking should be limited to essential users only. Suggest Park & Ride scheme similar to the old Newcastle layout, although a few car parks in town centre for essential users and evening visitors.
- Cars only in car parks and lorries etc to be parked away from homes.

- Not surface [car parking] but underground or roof and save useable area for other purposes.
- Like to see war declared on the motor car, especially no new car parks. Weekends are a nightmare around Romford.
- Please don't reduce the parking spaces in the town centre. Please keep free parking on Sundays.
- Ensure that any new developments have adequate car parking for their needs. One space per bedroom as a minimum.
- There is no indication to what an appropriate level of car parking provision is. We have the Brewery and now the Asda development with less than one space per unit of accommodation. This is inadequate and will lead to future problems but is it the appropriate level?
- Park & Ride at Christmas time only?
- None of your proposals have mentioned any improvements in facilities or parking for the disabled. What is to happen to Shopmobility (an essential service).
- Too much wasted space where meters could go.
- You ask for our comments on car parking after you have built the ASDA block of flats with insufficient car spaces. It does make a nonsense of your question and raises doubts on the others.
- The local authority has not considered people who have purchased homes who have to put up with car parks being erected opposite their homes. The residents in Western Road/Junction Road have generally been marginalised by planners. 1. Western Road is hazardous for pedestrians and drivers. The Council cannot enforce the No Right Turn into ASDA car park from Junction Road, therefore many drivers continue to turn right illegally, posing a continual risk to pedestrians and drivers alike. 2. During the Christmas period on Saturdays it is impossible for many residents to use their cars as: a) the long queue of traffic for the car park prevents reversing out on to Western Road or pulling out of their small driveways that are used for off street parking; b) the long queue of traffic turning in from Junction Road to queue for the car park at the far end of Western Road again creates traffic queues on both sides of the road, with little movement and each car 'nose to tail'. May I please urge you to consider the quality of life for residents in Junction Road and Western Road. There are four blocks of flats, two in Western Road and two in Junction Road. Western Road could easily be made one way from the Liberty Bell to Junction Road. Larger lorries and other traffic would then be forced to use the larger roads, such as main Road, which are more appropriate. This would ease congestion as drivers would be clear that they could only access Western Road car park from the Liberty Bell area. This would reduce traffic and build up and I am sure would improve movement of traffic at busier times. Traffic would be reduced at Western Road (Liberty Bell pub) because the road would be blocked, hence facilitating a greater flow of traffic at the roundabout from the Main Road and library area.
- Ground space too valuable to use for car parks - also unsightly and detrimental to Romford's image to attract shoppers and visitors.
- Why did you not provide adequate parking for the flats above the ASDA development? Those provided by the developer will not be adequate.

- Encourage public transport.
- Stop garages being converted and cars ended up on the road. All dwellings to have two off-road parking. Where are the overnight lorry parking in Havering?
- We need to restrict road traffic into Romford - it is a nightmare, has been for some time and needs to be addressed as soon as possible. I walk from Haynes Road into Romford (also Hornchurch and sometimes Upminster) and in inclement weather use the bus. Why can't others, with the exception of disabled people.

Response

85% of respondents supported the preferred option for Car Parking. However, following officer discussions and comments received from a number of organisations this is not being taken forward into the submission document. Comments received on this preferred option varied from support from Transport for London and London Travel Watch - who viewed this as a car restraint policy - to objection from the Government Office for London who thought the policy would increase the number of car parking spaces in Romford. Although the principle of this policy, which was designed to maintain public parking levels using less land, remains valid, at this stage it is not possible to identify which car parks could be developed in this way, and so this policy is being not taken forward as it is dependent on future initiatives and reviews. However, the absence of this policy does not prevent more efficient use of car parking being made in the future if this considered appropriate based on the evidence available at the time. Car parking standards for new development are set out in Annex 5 of the Core Strategy and will apply to Romford town centre: they are not affected by this change.

ROM3: Pedestrian and cyclist environment

The Council took forward two Preferred Options relating to the pedestrian and cyclist environment:

ROM3A: Pedestrian Links

ROM3E: Cycle Routes

ROM3A: Pedestrian Links

Our Preferred Option is to seek to improve the pedestrian environment and links into Romford by:

- **Seeking improvements to the design and lighting of subways under the Ring Road;**
- **Undertaking a feasibility study into replacing the North Street roundabout at the junction of the Ring Road with a signalled junction and surface level pedestrian crossing; and**
- **Undertaking a feasibility study into introducing pedestrian crossings at a number of locations around the Ring Road.**

ROM3A	Number of respondents	% of respondents
Support	108	87
Do not support	15	12
No response	1	1
Total	124	100

Additional comments

- The pedestrian links require to be refurbished not replaced. The replacing of the roundabout at North Street/Ring Road would not be beneficial. It works well as it is. Nor pedestrian crossing points around the Ring Road. This would only delay relatively fast moving traffic causing further delays.
- Pedestrian access from Oldchurch Hospital to the Brewery needed - not by underpass.
- Would also like to see more paths etc useable for wheelchairs and prams and clearly marked edge of steps.
- Pavement far too narrow on St Edwards Way bus stops when people are waiting. Their bags of shopping leave very little room to pass, therefore making bus passengers having to walk close to edge of pavement.
- Subways, yes. Traffic lights and pedestrian crossings, no, as these will add to traffic congestion.
- Disagree with doing away with roundabout at North Street for [traffic] lights. If pedestrians are to cross the Ring Road anywhere they should be above or below the road to separate them from the traffic flow. There is a never-ending flow of pedestrians along North Street into town.
- De-pedestrianise and bring back real streets.
- Would have said 'yes' without getting rid of the underpass.
- I believe it will be dangerous to encourage cycling in the town centre, which is largely pedestrianised.
- Pedestrianise Romford.
- A pedestrian crossing as an alternative to the underpass to and from the Market Place would encourage people to visit the eastern end of the Market Place after dark. Could the pedestrian crossing be halfway between the Library underpass and the North Street underpass?
- Traffic and pedestrians don't mix and subways are preferable to pedestrian crossings.

Response

87% of respondents supported the preferred option for pedestrian links. This is being taken forward into the Draft Submission Document as **ROM4: Pedestrian Links.**

ROM3E: Cycle Routes

Our Preferred Option is to support the creation of a new dedicated cycle route around the Romford Ring Road and investigate the opportunities to create more dedicated routes through Romford town centre.

ROM3E	Number of respondents	% of respondents
Support	76	61
Do not support	41	33
No response	7	6
Total	124	100

Additional comments

- Why bother with cycle lanes? Nobody uses them as cyclists are quite happy to ride on pavements putting pedestrians at risk!
- Support [cycle routes] but not through town.
- Will only believe in cycle lanes when I see them being used and cyclists still riding on pavements are caught and fined. Where are the PCSO's to do this? Same applies to litter louts.
- Cycle lanes (at great cost) are a waste of money until the police enforce the law regarding cyclists on pavements (despite a cycle lane being provided - Main Road is a prime example) and ignoring traffic regulations.
- If these [cycle routes] are 18 inch strips at the side of busy roads this is a waste of time and resources. Need dedicated cycle lanes.
- Do not see enough cyclists in the borough to justify the cost.
- Unless roads are widened, cycle lanes will add to vehicle congestion.
- Cyclists appear to be a growing menace and a danger in London. Don't need that in Romford - they have to come from surrounding areas to get on the Ring Road anyway which would cause more problems. Too much traffic on road for cyclists in town.
- Waste of money.
- Only if cycle paths are separate from main traffic. Existing cycle lanes are dangerous.
- Cycleways - please ensure that these are sensibly planned and implemented. Examples are: too wide, too narrow, bit part and on pavements that are too narrow, in roadways where car regularly park making them useless.
- Cycle paths should be adequately marked to avoid confusion as to who may use these. There should also be education / enforcement to ensure their proper use.
- Are cycle lanes really necessary? Rarely see them used.
- A non-starter.
- All new development should have a decent level of secure cycle parking.

Response

61% of respondents supported the preferred option for cycle routes. This is being taken forward into the Draft Submission Document as **ROM5: Cycle Routes**.

2. Cultural Destination Romford

ROM4: Cultural uses

The Council took forward three Preferred Options for cultural uses in Romford:

ROM4A: Respecting the historic environment

ROM4C: Market Place

ROM4E: Day and Evening Economy

ROM4A: Respecting the historic environment

Our Preferred Option is to:

- **Maintain the current Romford Conservation Area boundary pending the results of the Area Appraisal; and**
- **Encourage developers to assess the regeneration potential of other buildings of historical and/or architectural interest in their scheme.**

ROM4A	Number of respondents	% of respondents
Support	111	90
Do not support	7	6
No response	6	5
Total	124	100

Additional comments

- As a Romford resident for 45 years with siblings and grandchildren, parents and children all living in the area, appreciate the need for change and welcome it. But we must preserve that which is worth preserving - especially areas like the Gidea Park Exhibition Estate and Raphael Park. If property developers are allowed to despoil large parts for greed we will hang our heads in shame when the whole character of this unique haven is allowed to change.
- How can you speak of preservation when you allowed the 'Laurie' to be demolished even though it had a preservation order? Money could also have been spent on the Dolphin site, but no, you knocked that down as well. Where will the character of old Romford go next? [also ROM4C]
- This will be a first!
- Heritage buildings and important buildings with original character, including old inns, should be respected, restored and kept. Our town has been ruined already.
- Historic Romford - you demolished it in your bid for progress. Do we have a museum or heritage centre? Apart from the windmill and tithe barn in Upminster there is nowhere to go and see some of the history of this old town.

- Stress the importance of Romford's history. The old 'front gates' area of the Brewery could do with a makeover for a start.

Response

90% of respondents supported the preferred option for the historic environment. This is being taken forward into the Draft Submission Document as **ROM6: Respecting the Historic Environment.**

ROM4C: Market Place

Our Preferred Option is to encourage the use of the eastern end of the Market Place as an event space and focal point for Romford town centre.

ROM4C	Number of respondents	% of respondents
Support	93	75
Do not support	25	20
No response	6	5
Total	124	100

Additional comments

- Cannot agree with opening up the Market Place in this way. The Christmas event showed this to be unsuitable owing to overcrowding.
- Use of the eastern end of market for events. All in favour for but did not realise this could not be done already. Have seen band tattoos there if it used for the Christmas shopping nights. Would not want to see it used for is the development of another club whose only cultural events are 'wet t-shirt competitions' and other 'club like' activities that we have too many of already. When Hollywoods was being given planning permission that was floated as a family entertainment venue. Look what that actually turned out to be!
- Must have car access to drop off for events.
- More seating in the Market and around. Space for those in electric chairs and mothers with prams. No tall buildings round the Market.
- That new unfinished building at top of Market Place - it's not right. Design not matching the rest.
- Suggest developing a specific crafts market on Sundays which would possibly attract people who normally do not shop in Romford. You could consider the stalls that are at Greenwich Market and how they differ from the stalls that are traditionally in the marketplace on Wednesday, Friday and Saturday. As with Greenwich Market, I think this would be very successful.
- Concerned about events being organised that disturb the peace for people living close by.
- What have you done to our market? Your 'development' is killing it. There are not nearly as many stalls as there used to be. The covered area to the east end is an ideal spot for the drunks and druggies to hang out at night.

It is high time those dreadful 'sculptures' were removed. They are ugly and, more importantly, so out of place in an historic market place.

- Why is the east end building in the Market Place not complete? People are having to funnel into a narrow fenced pathway from the underpass to Market Place and have been for some time. 5% snagging works do not need 90% of time. Not encouraging for all new proposed development.
- [This section] talks about diversity in the Market Place. This is a place of historic value to the town and with too much diversity it could lead to losing the town's heritage and culture. There have been problems in other historic towns, i.e. Barking, Norwich and Bath, where their market places became very tacky and selling very cheap goods. Romford Market is renowned for selling good quality goods and reasonable prices, so the standards must be maintained. Once the museum is in place they may be able to research the towns traditions and unearth activities which used to take place here and revive those.

Response

75% of respondents supported the preferred option for the Market Place. This is being taken forward into the Draft Submission Document as **ROM7: Market Place**.

ROM4E: Day and evening economy

Our Preferred Option is to seek to diversify the daytime and evening economy of Romford by:

- **Seeking to reduce the concentration of licensed premises in South Street and dispersing some premises to other parts of the town centre (see also ROM5B);**
- **Setting an upper limit for evening economy uses in the town centre;**
- **Seeking to attract more family-friendly facilities;**
- **Seeking to attract more restaurants in the town centre; and**
- **Seeking to develop more facilities for young people, including a Youth Supercentre in the town centre.**

ROM4E	Number of respondents	% of respondents
Support	111	90
Do not support	9	7
No response	4	3
Total	124	100

Additional comments

- Youth Supercentre would clash with more restaurants.
- Develop [this option] to meet needs of 'Young People and Families' and the 'Older Generation'. Demolish the Queens Theatre at Hornchurch and build and develop a multi-purpose Arts Centre in the town centre, increasing the capacity to 2,000 plus. The Hornchurch Theatre has a

seating capacity of only 504 and is therefore dependent on public subsidy via a Council grant. Think big ... be bold ... in for a penny ... in for a pound.

- Romford has far too many pubs and clubs and just spreading them around the town will not help. Many of the clients of these establishments do not come from Romford so transport links do not need improving or they will attract more from out of area. Romford should be a family-friendly town which is safe by day and night. It is not, so police need assistance in patrolling the town centre of a night. By keeping the clubs in one area enables police to concentrate in that area and limits the nuisance to those that live in Romford to a confined area.
- Agree with some [but] no more drink outlets.
- A swimming pool in Romford would be nice.
- Less clubs with late licensing.
- Sports facilities - residents of Collier Row have to travel to Harold Hill to go swimming. Do we have an adequate art centre or exhibition gallery/rooms anywhere in Romford? Fairkytes is a fine old house but it falls far short of the designation of 'Art Centre' and Collier Row seems to be right off your map when planning any amenities that would enhance the lives of local residents.
- The town needs to get rid of its 'Ibiza' image and have a more family oriented feel. Fully support proposed Youth Supercentre. Over the years these kind of projects where the young people run the centres themselves with minimum guidance have been very successful.
- There are too many licensed premises in the centre of Romford.
- Reducing the licensed premises in South Street is long overdue - but do we really need more in other parts of the town?
- The clubs and pubs/bars should be kept to a minimum and not so close as they are now.
- Build new city centre swimming pool to replace the Dolphin and completely update the Ice Rink facility.

Response

90% of respondents supported the preferred option for the day and evening economy. This is being taken forward into the Draft Submission Document as **ROM8: Day and Evening Economy**. As work is ongoing between Youth Services and Property Services to find a suitable location/property for the Youth Supercentre and funding for the scheme has yet to be agreed this will not be included in ROM8. However, Development Control Policy DC26 (Location of Community Facilities) in the Core Strategy does allow for the provision of youth facilities in Romford town centre.

3. Commercial Romford

ROM5: South Street

The Council took forward two Preferred Options for South Street:

ROM5A: South Street

ROM5C: South Street (Use Classes)

ROM5A: South Street

Our Preferred Option is to encourage the consolidation of sites to provide new and larger retail units on South Street.

ROM5A	Number of respondents	% of respondents
Support	69	56
Do not support	46	37
No response	9	7
Total	124	100

Additional comments

- Please let Lidl stay somewhere in the Romford area.
- Develop entertainment area to encourage mixed age groups - clubs, pubs and restaurants.
- Don't need any more large retail stores in Romford. The smaller shops are struggling already. The town centre needs smaller shops and the Market is getting smaller and smaller.
- South Street shopping should be made more pleasant. Remove toilet. Better means to dispose of litter. Un-clutter it.
- South Street (south of the station) should be reinforced as a retail area along with ROM5B, including other mixed uses.

Response

56% of respondents supported the preferred option for new and larger retail units on South Street. This is being taken forward into the Draft Submission Document as a part of **ROM10: Retail Core**. ROM10 will combine three of the preferred options [ROM5A, ROM5C and ROM6A – see below] which applied to the core retail areas of South Street and North Street. ROM10 will set out the policy for the whole of the retail core of Romford town centre, which covers The Liberty, The Mall, The Brewery and parts of South Street, North Street and High Street. The Council considers it a more straightforward and practical approach to have one overall policy for the retail core, although ROM10 will include detailed criteria applicable to South Street and North Street as set out at preferred options stage.

ROM5C: South Street (Use Classes)

Our Preferred Option is to:

- Secure the same mix of retail and service uses on South Street (north of the station) as other parts of Romford's Retail Core; and
- Aim to reduce the concentration of pubs and bars in this area.

ROM5C	Number of respondents	% of respondents
Support	108	87
Do not support	11	9
No response	5	4
Total	124	100

Additional comments

- Develop entertainment area to encourage mixed age groups - clubs, pubs and restaurants.

Response

87% of respondents supported the preferred option for use classes on South Street. This is being taken forward into the Draft Submission Document as a part of **ROM10: Retail Core** (see above).

ROM6: North Street

The Council took forward two Preferred Options for North Street:

ROM6A: North Street (Retail Core)

ROM6B: North Street (Retail Fringe)

ROM6A: North Street (Retail Core)

Our Preferred Option is to retain North Street (within the Ring Road) as a Core Retail area and encourage niche retailing in this area.

ROM6A	Number of respondents	% of respondents
Support	112	90
Do not support	5	4
No response	7	6
Total	124	100

There were no additional comments on this option.

Response

90% of respondents supported the preferred option for the retail core of North

Street. This is being taken forward into the Draft Submission Document as a part of **ROM10: Retail Core** (see above).

ROM6B: North Street (Retail Fringe)

Our Preferred Option is to designate the retail component of North Street (north of the Ring Road) as a Fringe Retail area to enable a broader range of uses to be located here and to help integrate it into Romford town centre.

ROM6B	Number of respondents	% of respondents
Support	96	77
Do not support	20	16
No response	8	6
Total	124	100

Additional comments

- North Street, as the 'Gateway to Romford' is a disgrace.
- North Street (north of the Ring Road) is a mess and can be threatening at day or night.

Response

77% of respondents supported the preferred option for North Street (north of the Ring Road). This is being taken forward into the Draft Submission Document as a part of **ROM11: Retail Fringe**. ROM11 will combine two of the preferred options [ROM6B and ROM7B – see below] for North Street and High Street, which both proposed the revised designation of parts of these streets as fringe retail areas. ROM11 will set out the policy for all retail fringe areas in Romford town centre, which covers parts of High Street, North Street, South Street, Station Parade and Victoria Road and allows for some flexibility with regard to non-retail uses at ground floor level. The Council considers it a more straightforward and practical approach to have one overall policy for the retail fringe rather than have separate policies for different areas of the town centre with the same retail designation.

ROM7: High Street

The Council took forward one Preferred Option for High Street:

ROM7B: High Street

ROM7B: High Street

Our Preferred Option is to designate numbers 18-46 High Street (north side) as a fringe retail area to enable a broader range of uses to be located here and to ensure it remains an important part of the town centre.

ROM7B	Number of respondents	% of respondents
Support	110	89
Do not support	2	1
No response	12	10
Total	124	100

Additional comments

- Written off in my mind.

Response

89% of respondents supported the preferred option for High Street. This is being taken forward into the Draft Submission Document as a part of Policy **ROM11: Retail Fringe** (see above). 18-46 High Street is also designated as a **Site Specific Allocation (ROMSSA4)**.

ROM8: The Brewery

The Council took forward one Preferred Option for The Brewery

ROM8A: The Brewery

ROM8A: The Brewery

Our Preferred Option is to ensure that any redevelopment of the Brewery site considers:

- **Enhanced integration of the scheme with the town centre;**
- **A review of car parking provision to encourage a more efficient use of the site;**
- **Presents a positive frontage to the Ring Road; and**
- **Opportunities for direct linkages to the railway station.**

The Council will also seek to ensure that additional development on the site meets the following design criteria:

- **Considers a more positive use of circulation space in and around the scheme; and**
- **Reflects Romford's traditional street pattern and building / street relationship more closely.**

ROM8A	Number of respondents	% of respondents
Support	109	88
Do not support	6	5
No response	9	7
Total	124	100

Additional comments

- The Brewery development is awful. It seems to consist mainly of a giant car park with shops and other services barely visible. Hardly anywhere to sit when shopping either.
- Is it to be assumed that the original development has not been a success? The connections to the town centre are bad and leave a lot to be desired.
- The Brewery is a new development so one would have hoped its effects, character and integration into the town centre would have been taken account of at the design stage. The options given are vague as is most of this questionnaire.
- If development is being funded by the Council it would be better spent elsewhere.
- The car park is always full now. Where do you propose additional car parking?
- The access way to the [Brewery] site is inadequate. The overhead covers only protect some areas of the site and it is difficult for pedestrians to stay under cover in bad weather. There is frequent flooding in some parts - notably the path from Abbey National to Boots where the level drops. This also causes ice rink conditions in the winter. What happened to the promised bus service to the Brewery?
- Why anything fronting the Ring Road?
- The Brewery for shopping is a waste. Car parking OK. Getting out when very busy can be interesting. The links between the Brewery and main shopping area should be covered.
- Connect Brewery to bus stops. Romford feels rather disjointed as a whole.
- The Brewery is cut off from the rest of the town centre and, in my opinion, not very pleasant or easy to get to.
- The Brewery area is really nothing much. A museum was to have been built here - a tourist attraction. The Havering Museum was originally promised to be situated within the area of the old Brewery, intending to be made into a tourist attraction as well as for local people. Nowhere is there any mention of this Museum. What has happened to those plans? Somewhere in Romford there needs to be an attraction other than the usual shops and stores.

Response

88% of respondents supported the preferred option for The Brewery. This is being taken forward into the Draft Submission Document as **ROM12: The Brewery**.

ROM9: Romford Office Quarter

The Council took forward one Preferred Option for the Romford Office Quarter:

ROM9A: Romford Office Quarter

ROM9A: Romford Office Quarter

Our Preferred Option is to encourage proposals to increase the office accommodation in the Romford Office Quarter by promoting higher densities and encouraging residential and A3 uses (restaurants and cafés).

Romford Office Quarter will also be considered an appropriate location for tall buildings (six storeys or greater or over 18 metres in height above the ground).

ROM9A	Number of respondents	% of respondents
Support	71	57
Do not support	43	35
No response	10	8
Total	124	100

Additional comments

- No greater than six storeys.
- Increase offices but no other uses [in Romford Office Quarter].
- No more ugly tall buildings please.
- No residential properties in this area.
- Doubtful if more office space is needed. There are already plenty of empty offices in Romford and high rise blocks will spoil the outlook.
- Keep densities as they are.
- No tall buildings for Romford any more. Six storey absolute maximum.
- None of these aims [including ROM11B, ROM12A and ROM13D] are sensible without consideration of associated services - doctors, dentists, schools etc. - none of which are included in your plan.

Response

57% of respondents supported the preferred option for the Romford Office Quarter. This is being taken forward into the Draft Submission Document as **ROM13: Romford Office Quarter.**

NEW POLICY – ROM9: Romford: Metropolitan Shopping Centre

The Havering Retail and Leisure Study (2006) suggests that to maintain its role as a metropolitan centre, Romford can accommodate up to 30,000sqm of new comparison floorspace up to 2018. Based on the study and other comments received at preferred options stage, officers consider it necessary (appropriate) to include this new policy in the submission document. ROM9 will set the overall retail policy for the town centre and emphasise and strengthen Romford's role in the retail hierarchy.

4. Liveable Romford

ROM11: Housing Supply

The Council took forward one Preferred Option for housing supply in Romford:

ROM11B: Housing Supply

ROM11B: Housing Supply

Our Preferred Option is to seek to increase housing supply in Romford town centre by:

- **encouraging the intensification of low density sites such as Victoria Road, South Street (south of the railway line) and the Brewery;**
- **mixed-use redevelopment of existing single use sites such as Fitness First, Homebase, Lidl and Matalan; and**
- **making better use of the space above existing commercial premises such as The Liberty and The Mall.**

ROM11B	Number of respondents	% of respondents
Support	76	61
Do not support	36	29
No response	12	10
Total	124	100

Additional comments

- The infrastructure in Havering will fall apart if all the residential building mentioned in this survey goes ahead. More and more people, less and less hospitals and doctors, roads clogged with traffic etc. Where does it all end?
- Housing stock - encourage elderly transfer to smaller yet independent accommodation, releasing larger properties (existing) for family use. Benefits maximising usage of existing energy economics for pensioners in smaller property.
- My son will struggle to get a doctor, dentist or school place for his children due to the terrible overdevelopment of our town centre (Romford in particular).
- There is already enough high rise and flat developments in this area. What is needed is properties with gardens suitable for families with children.
- Too many flats popping up in the borough.
- The more housing is put on low density sites, the more car parking will be required and add to traffic congestion.
- Who would want to live in central (binge drinking) Romford?
- Will more housing not bring vehicles into Romford town centre? Do we really need this?
- Object to perfectly good houses being torn down in old Romford, e.g. Mawney Road, Marks Road (Family Centre), the old people's home

(Marks Lodge) and various other sites, to be replaced by flats. There are just too many people living in Romford. Consider if we can provide doctors, hospitals, schools, dentists etc? We can't.

- No more blocks of flats. We who live in central Romford are heartily sick with all the building work etc. going on these past few years and dread the thought that it looks as if we will have to put up with it for many more. The one thing we all desperately want here is a new swimming pool.
- Any housing developments must have sufficient parking space (off road perhaps) for residents.
- Hate ugly blocks of flats in the town centre. Are extra schools, dentists and doctors being provided to service these? It is already impossible to get an appointment with a G.P. without having to wait three weeks.
- Disagree with even more intensification of housing into Coronation Street type.

Response

61% of respondents supported the preferred option for housing supply in Romford. This is being taken forward into the Draft Submission Document as **ROM14: Housing Supply**.

ROM12: Housing mix and tenure

The Council took forward one Preferred Option for housing mix and tenure in Romford:

ROM12A: Family Accommodation

ROM12A: Family accommodation

Our Preferred Option is to encourage, where appropriate, family accommodation (including houses) of all tenures on the fringe of the town centre. Within flat or maisonette developments, family accommodation should be at ground floor level with an enclosed private outdoor amenity area.

ROM12A	Number of respondents	% of respondents
Support	92	74
Do not support	23	19
No response	9	7
Total	124	100

Additional comments

- i.e. ghetto of low income families.
- Family housing should not be restricted to ground floor and maisonettes; it should be encouraged in flats by building bigger flats.

Response

74% of respondents supported the preferred option for family accommodation in Romford. This is being taken forward into the Draft Submission Document as **ROM15: Family Accommodation**.

ROM13: Affordable Housing

The Council took forward one Preferred Option for affordable housing in Romford:

ROM13D: Affordable Housing

ROM13D: Affordable Housing

Our Preferred Option is to adhere to Borough-wide affordable housing policy rather than develop a specific approach for Romford town centre.

(Borough-wide policy states that the Council will aim to achieve a minimum of 35% of all new homes built in the Borough as affordable).

ROM13D	Number of respondents	% of respondents
Support	91	73
Do not support	24	19
No response	9	7
Total	124	100

Additional comments

- Your Action Plan should include the building of public housing and more affordable housing.
- If affordable (social housing) properties are to be made available in or close to town centre then play areas must be provided for young children.
- 35% affordable housing is ridiculous. It is not needed for local people. I resent our spaces and money being spent on housing for people from outside the borough. This changes the make up and requirements away from what local people require. There is also not enough hospital or school space for all these new people.
- Spread affordable [housing] around. Affordable equals low quality in people's minds.
- What is your figure exactly for 'affordable' housing? Affordable housing is quoted but it means nothing unless you quote a figure or figures.
- 35% [affordable housing] too low.

Response

73% of respondents supported the preferred option for affordable housing in Romford which was for the Core Strategy policy for affordable housing to apply in Romford town centre. Therefore no policy is being taken forward into

the Submission document as CP2 in the Core Strategy will apply to Romford as well.

ROM14: Green Space and River Corridors

The Council took forward four Preferred Options for Green Space and River Corridors in Romford:

ROM14A: Greening Romford (Tree Planting)

ROM14B: River Rom

ROM14C: New Green Features and Spaces

ROM14D: Existing Green Spaces

ROM14A: Greening Romford (Tree Planting)

Our Preferred Option is to expect developers to contribute towards programmes of tree planting in the town centre, particularly along thoroughfares and around the Romford Ring Road.

ROM14A	Number of respondents	% of respondents
Support	114	92
Do not support	2	1
No response	8	6
Total	124	100

Additional comments

- Lost many green areas in central Romford. How do you intend to replace these? Also, most of the trees planted in the Market Place as well as South Street are showing signs of severe distress due to not being looked after properly. [Applies to ROM14D also]
- Whilst in favour of tree planting, care must be taken vis-à-vis location. It is important to recognise the community feeling of 'well being and security' not just statistics.
- Any trees planted must be looked after. All too often it appears that young trees are planted and then left to die.
- Consult residents first.
- Careful consideration as to species of trees to plant. Consider problems of leaf fall and roots damage to adjacent areas [and ROM14C].
- The 'Green Area' around the ASDA development are a disgrace - weeds and black tyre marks on the surrounds.
- Tree planting should not be solely reliant to developer's contributions. Developer's contribution should be seen as an addition to the Council's budget.
- Parks should also be included. How many new trees have been planted?

Response

92% of respondents supported the preferred option for greening Romford. This is being taken forward into the Draft Submission Document as a part of **ROM17: Greening Romford**. ROM17 will combine three of the preferred options [ROM14A, ROM14C and ROM14D – see below] which proposed environmental [and biodiversity] improvements into one policy for 'greening' Romford town centre. The policy will include detailed criteria applicable to different schemes and areas of the town centre as set out at preferred options stage.

ROM14B: River Rom

Our Preferred Option is to work with the Environment Agency to seek to open up the River Rom in the town centre and create a new riverside pedestrian walkway.

ROM14B	Number of respondents	% of respondents
Support	106	85
Do not support	8	6
No response	10	8
Total	124	100

Additional comments

- It may be of value in remembering that the River Rom was going to be a canal and we would have had a waterfront in Romford if it had been completed (it's still possible!).
- Any further development or opening up of the River Rom will only cause more dumping of rubbish in the open river.
- Completely in favour of developing area around the Rom in the town centre. A very good idea for riverside walkway plus more greenery, flowers etc.
- Brilliant idea - would bring back some individuality and character to the area.
- It will never happen.
- Please ensure that these are designed as far as practical to serve as wildlife corridors as well as pedestrian/cycle routes: design details are very important in this respect. [also ROM14D]
- Good idea.
- An option to open the River Rom would enhance Romford. To develop walkways and cafeterias would certainly bring a quality of life to the residents of Romford.
- The [River] Rom walkway sounds idyllic but question its safety in the light of present crime scene.
- Bringing back the River Rom would soften the area and make it a relaxing walkway. What about 'punts' on the river as they have in Cambridge?

- In opening access to the River Rom, this should include a cycle link as well as footway links.

Response

85% of respondents supported the preferred option for the River Rom. This is being taken forward into the Draft Submission Document as **ROM18: River Rom**.

ROM14C: New Green Features and Spaces

Our Preferred Option is to encourage new development to incorporate tree planting and green (amenity) space at surface level and above.

ROM14C	Number of respondents	% of respondents
Support	115	93
Do not support	0	0
No response	9	7
Total	124	100

Additional comments

- Any new green spaces need to be maintained, not, as many are now, overgrown and untidy.
- Good - we don't want over-development.
- Surface level only.

Response

93% of respondents supported the preferred option for new green features and spaces. This is being taken forward into the Draft Submission Document as a part of **ROM17: Greening Romford** (see above).

ROM14D: Existing Green Spaces

Our Preferred Option is to protect and enhance the existing green spaces and areas of biodiversity value in the town centre, including St Edwards Church gardens and the town centre railway sidings area, and enhance pedestrian and cyclist routes to green spaces outside the centre, such as Cottons Park, Lodge Farm Park, Raphaels Park and Harrow Lodge Park.

ROM14D	Number of respondents	% of respondents
Support	115	93
Do not support	2	1
No response	7	6
Total	124	100

Additional comments

- Pay particular attention to railway sidings [existing green spaces]; usually tatty.
- Clean up goose droppings in Raphaels Park.
- Please do something to return Raphael Park to the beautiful grassed area it once was. It is a desert by the gate. Also make sure that the rubbish is emptied regularly (they are often overflowing).

Response

93% of respondents supported the preferred option for existing green spaces. This is being taken forward into the Draft Submission Document as a part of **ROM17: Greening Romford** (see above).

ROM15: Urban Design in Romford town centre

The Council took forward three Preferred Options for Urban Design in Romford town centre:

ROM15A: Tall Buildings
ROM15B: Urban Design
ROM15F: Public Spaces

ROM15A: Tall Buildings

ROM15A: Tall Buildings

Our Preferred Option is to provide guidance on the location of tall buildings (six storeys or greater or over 18 metres in height above the ground). The Council considers the following locations only to be appropriate sites for tall buildings:

- **Along the Ring Road at the junctions of North Street, High Street, Western Road, Main Road and South Street;**
- **Near Romford Station; and**
- **Romford Office Quarter**

ROM15A	Number of respondents	% of respondents
Support	58	47
Do not support	55	44
No response	11	9
Total	124	100

Additional comments

- If tall buildings continue we'll become like other towns in other countries and will not be able to see the sky even! This used to be a lovely peaceful country town. Why not spend on replacement of water and other old underground pipes and employ more rodent catchers?

- Tall buildings should be kept within the confines of the Ring Road. To include Main Road will only encourage sprawl. Main Road is largely family houses and should be kept that way.
- Tall residential buildings in town centre do nothing for enhancing 'community' experience.
- High buildings and much increased density should not be encouraged south of the railway line. If this is allowed it would eventually creep all the way to Roneo Corner.
- Awful.
- What about 'green roofs' here as well? [also ROM15B]
- Concerned about interference to TV/Radio signals in and around Romford town centre (with reference to the ASDA development), how tall they would be over 6 storeys and car parking provision.
- Concerned about the number of high rise residential accommodation. Have the Council not learnt from the past when high rise flats were built which turned into ghettos and no-go areas. Look at some of the areas in our cities which are undesirable place to live.
- Not keen on very high buildings, prefer to have "essential mainstream updating and development" commensurate to town and rural nature of Romford - nothing too modern or intrusive! Beware property sharks. Encourage local democracy.
- There should be no more tall buildings in North Street.
- Much against tall buildings. They take so much away - light, sky - they only add congestion and gloom.
- Romford already has enough high buildings over 18 metres. No more please.
- Accept there will always be a need to have tall buildings but must be sympathetic with the existing building and environment.
- Against high rise development.
- Resist the temptation to build 'high rise' units. They only increase the density of occupation which will overstretch the supporting service industries.
- Let there be careful consideration when raising buildings from 4 storeys to 6 storeys that it is carried out with sensitivity to the surrounding buildings. Could there be a scaled model of the plans of the town made available for residents to see before final plans are approved?

Response

47% of respondents supported the preferred option for tall buildings, compared to 44% who did not support it. This is being taken forward into the Draft Submission Document as **ROM19: Tall Buildings**.

ROM15B: Urban Design

ROM15B: Urban Design

Our Preferred Option is to require high quality design-led development in Romford. Development will be required to:

- **Respect the scale and massing of existing buildings in the Market Place;**
- **Reinforce Romford's traditional street layout;**
- **Preserve or enhance the view of St Edward's spire from the bottom of South Street and other local views which enhance the centre's legibility;**
- **Reinforce the prominence and importance of the High Street / North Street axis; and**
- **Increase civic pride by instilling a sense of place.**

ROM15B	Number of respondents	% of respondents
Support	109	88
Do not support	2	1
No response	13	10
Total	124	100

Additional comments

- Wider usage of clearer, larger and tactile signage.
- Housing developments on busy roads should be designed around central courtyards rather than the balconies overlooking the main road.
- The whole town centre is a mess.
- What energy saving plans are being proposed for all new buildings - private and commercial?
- All developments should be built to Secured By Design standards as a planning condition.

Response

88% of respondents supported the preferred option for urban design. This is being taken forward into the Draft Submission Document as **ROM20: Urban Design**.

ROM15F: Public Spaces

ROM15F: Public Spaces

Our Preferred Option is to promote the development of new, high quality hard landscaped public spaces, particularly within the Romford Office Quarter, and as part of any redevelopment of Romford Station and remodelling of Romford Brewery.

ROM15F	Number of respondents	% of respondents
Support	104	84
Do not support	8	6
No response	12	10
Total	124	100

Additional comments

- The term 'hard landscaping' conjures up images of the terrible 'art installations' currently on the Dagenham section of the A13. Any landscaping, I feel, should be a space to relax and switch off from the grind of daily life. Ideally planted with aromatic plants/shrubs and lawned seating areas.
- Yes, but not the Brewery - spend elsewhere.
- Vandal proof and open.

Response

84% of respondents supported the preferred option for public spaces. This is being taken forward into the Draft Submission Document as **ROM21: Public Spaces**.

NEW POLICY – ROM16: Social Infrastructure

A number of respondents highlighted the need for infrastructure provision, such as healthcare and other community facilities in their response to the preferred options. This was also raised by the Government Office for London in their response. Havering PCT and the NHS London Healthy Urban Development Unit (HUDU) also highlighted this issue in their comments to the Council on the Submission Core Strategy DPD and in discussions with officers prior to the Core Strategy Examination in July 2007. Given the increasing population in Romford town centre, the Council considers it appropriate for the Area Action Plan to have a policy which will enable the provision of social infrastructure, specifically health and education facilities, to meet additional demand.

Site Specific Allocations

In addition to the Preferred Options, six Site Specific Allocations were also identified:

Site 1: Angel Way	Number of respondents	% of respondents
Support	95	77
Do not support	9	7
No response	20	16
Total	124	100

Response

77% of respondents supported Site 1: Angel Way. This is being taken forward into the Draft Submission Document as **ROMSSA1: Angel Way**.

Site 2: Bridge Close	Number of respondents	% of respondents
Support	91	73
Do not support	12	10
No response	21	17
Total	124	100

Additional comments

- Bridge Close - no more cafes etc. Too many now in Romford. Note the state of restaurant conglomeration in Victoria Road.

Response

73% of respondents supported Site 2: Bridge Close. This is being taken forward into the Draft Submission Document as **ROMSSA2: Bridge Close**.

Site 3: Como Street	Number of respondents	% of respondents
Support	77	62
Do not support	24	19
No response	23	19
Total	124	100

Response

62% of respondents supported Site 3: Como Street. This is being taken forward into the Draft Submission Document as **ROMSSA3: Como Street**.

Site 4: 18-46 High Street	Number of respondents	% of respondents
Support	95	77
Do not support	11	9
No response	18	15
Total	124	100

Response

77% of respondents supported Site 4: 18-46 High Street. This is being taken forward into the Draft Submission Document as **ROMSSA4: 18-46 High Street.**

Site 5: 25-59 High Street	Number of respondents	% of respondents
Support	91	73
Do not support	15	12
No response	18	15
Total	124	100

73% of respondents supported Site 5: 25-59 High Street. In line with the preliminary findings of the Romford Conservation Area Appraisal, numbers 25-35 High Street have not been included in this site because they retain a strong Edwardian character. Numbers 37-59 High Street will be taken forward into the Draft Submission Document as **ROMSSA5: 37-59 High Street.**

Site 6: Station Gateway and Interchange	Number of respondents	% of respondents
Support	95	77
Do not support	12	10
No response	17	14
Total	124	100

77% of respondents supported Site 6: Station Gateway and Interchange. This is being taken forward into the Draft Submission Document as **ROMSSA6: Station Gateway and Interchange.** However, the boundary for ROMSSA6 has been amended so that it excludes land to the east of South Street. This is because of land ownership difficulties on the land on the corner of Victoria Road and South Street and because the land north of the railway is within the Romford Office Quarter and will benefit from this particular policy designation (ROM13). In addition, the amended site also includes the Fitness First and Lidl sites on Atlanta Boulevard. These are currently low density, single use sites with substantial surface level car parking and their incorporation into ROMSSA6 offers the opportunity for a more appropriate level of development in line with the redevelopment of the Station area.

General Comments on the Area Action Plan

- A most reasonable Plan/Strategy. I am only sorry I will not see it fulfilled.
- Your Action Plan would be more useful if it contained a map!
- Toilets will always need to be opened at reasonable hours - not the tin pay ones.
- I would like to let Romford develop like it has in the past, apart from the clubs and food chains etc. and major planning around things such as roads and important specific areas should be the only thing really looked at.
- Compliments and congratulations on a comprehensive paper.
- I think there are some excellent ideas here for making Romford a pleasant and enjoyable place to live, shop and work. I would hope that any projects undertaken will incorporate environmentally friendly standards. I also think it would be a good idea to move the main library into the heart of the town centre, e.g. into the Market Place or the Brewery site. Give it a good revamp too. A good model would be the 'Ideas Stores' in Whitechapel and Bow.
- Thank you for your work on this project.
- The questions are worded in such a way that one can agree with one part of it but not all of it. A tick does not necessarily mean that one agrees or disagrees with all of the contents of the question.
- Pity the map on the front is out of date!
- This questionnaire overall is a waste of yours and my time as questions and options are not detailed enough for me to form an opinion in most cases or are so vague that the Council will do as it wants anyway. If members need a questionnaire like this to tell them the people of Romford want something done about the job culture that exists - much of it imported because the clubs are all situated on good transport links - and makes Romford unsafe for residents of a night, then they do not deserve their member allowances as they have obviously not been listening to the people of Romford for many years and have not been representing them.
- Romford is a mish-mash of pedestrian/road systems. Buses go round back alleys and some only stop at either end of town. All roads should be opened up for traffic and made two-way, including South Street. More parking meters should be put in along Western Road. Night clubs should be axed. Bus stop in South Street for 193. Romford is third choice after Hornchurch and Upminster due to half-baked plans over the years.
- You give preferred options! Is there no other?
- Romford should be considered as a whole - not in separate parts. The preserving of heritage is paramount.
- Can the issue of graffiti and street cleanliness be addressed?
- Reading through comments on your previous consultation, from some of Romford's residents, I note that pubs, clubs, subways, pedestrian crossings, high-rise buildings [and] destruction of some parts of old Romford, have concerned many Romfordians for several years but the Council saw fit to ignore their suggestions. Sometimes the minority can be proved correct and in future given more consideration. I joined two protests that the Council eventually took notice of: i) the removal of the

Central Library to the Dolphin (what a disaster that would have been); ii) the closure of Gidea Park library - now a pleasant, thriving place to visit. I do not want to appear negative but many of us feel that these consultation initiatives have appeared after buildings have been constructed. My negative comments re. Site Allocations are really due to ignorance and suspicion of such terms 'mixed use', 'retail' [and] 'commercial'. When considering plans for the future I hope our Council will, at this present time, concentrate on making Romford clean, free from rubbish and graffiti, the town centre restored to a place where local people can enjoy their town both day and night, our parks kept free from anti-social incidents and plenty of tree planting continued. I do appreciate that the Council - with the help of local residents - is trying to keep Romford a green and pleasant place to live. I hope that this will continue as I have spent 75 years here; I and my children benefiting from its schools, churches, youth clubs, parks and surrounding countryside. Maybe your next communication could inform us about which of your plans have been accomplished.

- Costs - who pays and how much? The Council should concentrate on their core job functions before tackling this Action Plan.
- The Mall is hot and airless in summer with no apparent means of ventilation or provision of shade. It is noisy due to the unfortunate echoing effect of sound within the confined space. Romford consists mostly of clothes shops, the same can be seen in any other shopping area.
- Let us all feel safer in Romford at any time of day or night. This also includes other Havering town centres.
- Advertise Romford 24/7 including all local events, i.e. Farmers Market etc.
- There are many excellent proposals in the report.
- The change of usage for many of the retail and non-retail premises is long overdue.
- I agree with most of your improvements for the town centre but wonder what, if any, improvements you plan for areas such as Collier Row? Are you aware, for instance, the problems that are now occurring in Lawns Park with youths late at night (ref. the Romford Recorder). These are areas that we at Collier Row need improvements on, for instance, making the park secure at night to stop the above. On a lighter note you mention cycle paths. Why not one from Havering village to Hainault that can also be used by wheelchairs and motorised trolleys for disabled?
- Obstructions to the Ring Road must be kept to a minimum or it does not serve its purpose. The traffic signals added for the benefit of traffic exiting the Brewery could have been avoided by using a dedicated left turn only lane.
- This seems a very robust set of proposals and I have to support them all.
- All transport-related issues should be seen as strategic and therefore any decisions on highway changes, layout, schemes etc should be decided by a strategic committee rather than an Area Committee.
- Need to include facilities for the PCT (Locality and Community Services) and Mental Health Services in affordable central locations within central Romford, i.e. Station Gateway and Interchange.

The demographic breakdown of respondents was:

Gender

	Number	Percent
Male	71	61
Female	45	39
Total	116	100
Missing: 8		

Age

	Number	Percent
12 – 17	-	-
18 – 24	4	3
25 – 34	8	7
35 – 44	7	6
45 – 54	14	12
55 – 64	27	23
65+	65	57
Total	115	100
Missing: 9		

Ethnicity

	Number	Percent
White – British	105	90
White – Irish	1	1
White – Other	3	3
Black or Black British – Caribbean	-	-
Black or Black British – African	-	-
Mixed – White and Black Caribbean	-	-
Mixed – White and Black African	-	-
Mixed – White and Asian	-	-
Asian or Asian British – Indian	1	1
Asian or Asian British – Pakistani	-	-
Asian or Asian British – Bangladeshi	-	-
Chinese	-	-
Other *	7	6
Total	117	100
Missing: 7		* 7 English.

Do you have a long-standing illness, disability or infirmity?

	Number	Percent
Yes	28	24
No	75	76
Total	117	100
Missing: 7		

[If yes] does this illness or disability limit your activities in any way?

	Number	Percent
Yes	24	86
No	4	14
Total	28	100

Appendix 1: Romford Area Action Plan policies and site specific allocations

The following policies and Site Specific Allocations have been taken forward into the Submission Document.

Policies

ROM1	ROMFORD STATION GATEWAY
ROM2	EAST LONDON TRANSIT
ROM3	BREWERY BUS PROVISION
ROM4	PEDESTRIAN LINKS
ROM5	CYCLE ROUTES
ROM6	RESPECTING THE HISTORIC ENVIRONMENT
ROM7	MARKET PLACE
ROM8	DAY AND EVENING ECONOMY
ROM9	ROMFORD: METROPOLITAN SHOPPING CENTRE
ROM10	RETAIL CORE
ROM11	RETAIL FRINGE
ROM12	THE BREWERY
ROM13	ROMFORD OFFICE QUARTER
ROM14	HOUSING SUPPLY
ROM15	FAMILY ACCOMODATION
ROM16	SOCIAL INFRASTRUCTURE
ROM17	GREENING ROMFORD
ROM18	RIVER ROM
ROM19	TALL BUILDINGS
ROM20	URBAN DESIGN
ROM21	PUBLIC SPACES

Site Specific Allocations

ROMSSA1	ANGEL WAY
ROMSSA2	BRIDGE CLOSE
ROMSSA3	COMO STREET
ROMSSA4	18-46 HIGH STREET
ROMSSA5	37-59 HIGH STREET
ROMSSA6	STATION GATEWAY AND INTERCHANGE

Appendix 1b

Romford Area Action Plan

Organisations' responses to the
Preferred Options Report

September 2007

Havering's Local
Development Framework



Organisations' responses to the Romford Area Action Plan Preferred Options Report

The Romford Area Action Plan (AAP) will form a key part of the Havering Local Development Framework (LDF). It aims to promote and enhance Romford's position as east London's Premier Town Centre and will set out the policies and proposals to deliver growth, stimulate regeneration and protect Romford's assets. The AAP will provide policies which highlight development opportunities in the town centre and will be used as the principal tool to guide development proposals that come forward.

This report details the responses of organisations' to the Preferred Options Report which was published for consultation between 21st August and 6th October 2006. 15 organisations responded to the consultation (see below) and their comments are summarised in this report.

124 members of the public also responded to the Preferred Options questionnaire and report and their responses have been recorded in a separate report.

Next stage

The comments received have been used to inform the preparation of the Draft Submission Romford Area Action Plan which will be submitted to the Secretary of State in November 2007 and is scheduled to go to an Independent Examination in August – September 2008.

Organisation respondents

The following organisations responded to the Romford Area Action Plan preferred options consultation:

- Barton Willmore Partnership (representing North Street Settlement Trust)
- Bellway Homes [Questionnaire response and comments]
- Cluttons (for Crown Estate)
- Donaldsons (representing Cosgrave Property Group)
- GLA
- Government Office for London
- Havering Heritage
- Highways Agency
- London Buses [Questionnaire response – no additional comments]
- London Fire & Emergency Planning [Questionnaire response – no additional comments]
- London TravelWatch
- Natural England
- Network Rail
- Thames Water Property Services
- Transport for London

Background and Context

Issue / Option	Consultee	Summary of Comments	Council's recommended response
Introduction to the LDF and Romford AAP	Havering Heritage	<p>Assessing “sustainability” – this word or connotations thereof is used extensively but is NOT defined (see also similarly in Para. 1.9 and Para 1.10)</p> <p>A sudden reference to Havering’s Statement of Community Involvement (SCI) continues ... ”make it clear“ but where is a previous reference to the statement?</p> <p>How and when did the Council consult the community and stakeholders and who are the latter?</p>	<p>‘Sustainability’ is explained in Paragraph 1.8.</p> <p>Havering’s Statement of Community Involvement is available on the Havering website.</p> <p>This is explained in the Romford Area Action Plan Statement of Compliance.</p>
Romford Town Centre Context	Havering Heritage	<p>Here are some extraordinary points which are doubtful:</p> <ul style="list-style-type: none"> • 25 million visitors each year – how is this figure arrived at? Do none ever visit Hornchurch / Upminster or other parts of the Borough? • “16 minutes away from Liverpool Street by train” – this may be true on a few trains but not true generally. • “benefit from Crossrail” – this is not explained • East London Transit – this is not explained (but see some articles quoted in Romford Historical about the banning of trams in Romford). The present reference is a ‘pipe dream’ only and cannot be considered now. • Served by ‘in excess of 30 Bus Routes – many have to use a narrow one way street – Chandler’s Way – with 17 routes using one Bus Stop in Western Road and NOT STOPPING there after 9.30pm. • ‘Bus routes serving Essex’ is not true except in so far as Brentwood being in Essex. • Other comments suggest the ‘Night life’ or ‘evening economy’ facilities are due to be withdrawn or reduced so how is the present position offered as a headline statistic. 	<p>This data is from a survey by Hammerson’s in 2006.</p> <p>This is true for the ‘fast trains’ which leave from platform 2 of Romford Station.</p> <p>Change “benefit from Crossrail” to “served by Crossrail”.</p> <p>East London Transit is expected to be implemented by 2015.</p> <p>Noted.</p> <p>Buses also serve Lakeside, Grays and Harlow (daily) and Chelmsford (Sunday only). For example services 370 and 500.</p> <p>The statistics in this section are for Romford at present.</p>

Issue / Option	Consultee	Summary of Comments	Council's recommended response
		<ul style="list-style-type: none"> • Romford did NOT receive its (or even 'a') Royal Charter in the C.13. • Figure 3: Completely ridiculous – 5th symbol suggests the Library / Town Hall / Churches &c are “Industrial” and the out of date map shows the old Technical School (now a housing estate) also as Industrial. <p>Housing target of 350 new homes per year for Havering increasing to 535 new homes – this does not indicate Romford Town’s proportion. Overall – this does not relate to the targets suggested in the ‘Issues and Options Report of April 2006 (see page 36 Para 4.5 ‘with particular reference to Romford’.</p> <p>Para 2.7: Sudden emphasis on ‘Havering’ and no mention of ‘Romford’.</p> <p>Para 2.8: Romford is NOT directly connected to the underground system.</p> <p>Para 2.9: “Waste” treatment works are in Rainham NOT Romford Town.</p> <p>“Historic conservation” – Havering Council consistently rejects this aspect in planning decisions (e.g. Oldchurch Hospital).</p> <p>Para 2.13: “the Romford Urban Strategy document has been used to inform the evidence base” – what on earth does this mean?</p> <p>Para 2.15: Havering Council has done nothing yet to ‘reinforce its historic identity’!</p> <p>Para 2.16: IPG is pro-tem the guide for the statutory planning framework UNTIL the LDF/AAP is adopted but it is not referred to currently (see North Street redevelopment planning application recently rejected)</p>	<p>Comments noted. Text to be amended in submission document.</p> <p>Colour version (on website) distinguishes between industrial and public buildings. Map will be amended if used in submission document.</p> <p>London Plan does not set a proportion of housing for Romford. Paragraph 8.5 of the Preferred Options Report identifies housing sites and figures for Romford.</p> <p>This section talks about Havering not Romford.</p> <p>The text does not say that Romford is directly connected to the underground system.</p> <p>The text does not refer to Romford.</p> <p>Noted.</p> <p>This means that the Romford Urban Strategy has informed the evidence base upon which the policies in the submission document are founded.</p> <p>The report talks about future plans.</p> <p>The Interim Planning Guidance is used and was referred to by the Inspector in the North Street appeal.</p>

Vision and Objectives

Issue / Option	Consultee	Summary of Comments	Council's recommended response
Vision for Havering	Havering Heritage	What makes up the 'Strategic Partnership'? The change from Romford Action Plan suddenly to Havering Strategic Partnership is 'NOTED' – changing in Para 1.5.	Havering Strategic Partnership is made up of representatives from key Havering organisations in the public, private and voluntary sectors.
Area Action Plan Vision	Donaldsons (representing Cosgrave Property Group)	<p>General support is given to the vision. However, the text should acknowledge that the town centre will need to expand its retail offer in order to continue to compete with Bluewater and Lakeside. Indeed, the Retail Capacity Study has identified that there is a need for an additional 30,000sqm comparison floor area in the period up to 2018. This should therefore be acknowledged within the bullet point.</p> <p>In addition, bullet 7 should be reworded to state '... the town centre will be a place of high quality high density, residential living that provides easy access to ...' The AAP does seek high density residential development within the town centre and therefore the vision should be more explicit in this respect.</p>	<p>Support welcomed.</p> <p>Text to be amended in submission document to include reference to additional retail floorspace.</p> <p>Residential development will be in line with the density ranges set out in the London Plan and taken forward in the Havering Core Strategy therefore there is no need to make this explicit within the vision.</p>
Area Action Plan Vision	GLA	The vision and objectives are consistent with the aspirations for Romford town centre set out in the East London Sub-Regional Development Framework, which accompanies the London Plan. This seeks Romford's Metropolitan role to be sustained through both quantitative and qualitative improvements to the retail, culture and leisure offer, including integrated approaches to the management of the evening economy and significant new housing provision as part of broader, mixed use development. The East London Sub-Regional Development Framework notes that Romford remains the strongest of the town centres in the sub-region despite competition from retail destinations outside London including Lakeside and Bluewater.	Comments noted and support welcomed.
Area Action Plan Vision	Havering Heritage	<ul style="list-style-type: none"> What or who is the Romford Town Centre Partnership? Is the public involved in membership? 	Romford Town Centre Partnership Board meets every 3 months and comprises representatives from London Borough of Havering (Leader of the Council, Chief Executive and Senior Officers), AON Limited, The Liberty, The Mall, The Brewery, Metropolitan

Issue / Option	Consultee	Summary of Comments	Council's recommended response
		<ul style="list-style-type: none"> • Green spaces: Romford does not have any! • Market Place: is a large Public car park for 4 out of 7 days of the week. • Romford does not possess even one historic plaque to denote anything of its history or heritage (Market Place is an example!). A positive change is needed here. • Romford Town Centre possesses FLATS and not any other form of housing. • Where is the base for the suggestion that 'overall traffic growth will be falling'? As to many people choosing to walk – see my comments to Peter Hall (23rd August) showing how many pedestrian areas are unsafe. 	<p>Police, Romford Shopping Hall, the Chaplain of St Edwards Church, and the MP for Romford. No members of the public are on the Board.</p> <p>Romford has green spaces, although the report acknowledges there is little within the town centre.</p> <p>Noted.</p> <p>This is not a planning issue.</p> <p>While much of the recent town centre housing has been flats, the south eastern corner of the town centre has a large number of family homes.</p> <p>Transport for London set a target for traffic growth of 1% in Romford between 2001 and 2011 (compared to 6% growth in Havering).</p>
Area Action Plan Vision	Natural England	Paragraph 2.1 bullet point 3 which is in relation to Green Spaces states them not only being protected but enhanced as well together with opportunities to create new green spaces and ensure richer biodiversity. We welcome the inclusion of the word 'enhancement' which is sometimes excluded from similar statements.	Support welcomed.
Area Action Plan Objectives	Donaldsons (representing Cosgrave Property Group)	<p>General support is given to the objectives. However, the following comments are made:</p> <p>Under Liveable Romford, the first bullet point should be revised to state 'to maximise the provision of high quality, high density housing, I the town centre, including affordable housing.' At present the bullet only acknowledges the need to maximise affordable housing. Market housing will be as important as affordable housing in order to ensure a sustainable community and therefore this should be acknowledged.</p>	<p>Support welcomed.</p> <p>No change to text regarding high density [see above] but officers suggest acknowledging market housing as this will form the majority of new development in the town centre.</p>

Issue / Option	Consultee	Summary of Comments	Council's recommended response
		<p>Under Liveable Romford, the final bullet point should be revised to state 'promote high quality, high density, design led development.'</p>	<p>Suggested revision to Objective E:</p> <p>"To maximise the provision of high quality affordable housing of all tenures in the town centre".</p> <p>No change (see comments on p.5).</p>
Area Action Plan Objectives	GLA	[see comments on vision and objectives above]	Comments noted and support welcomed.
Area Action Plan Objectives	Havering Heritage	<p>Compare 'future parking shortages' with Para 2.1 (above) "traffic growth falling".</p> <p>Existing green spaces – none exist!</p> <p>Promote quality open spaces in the town centre – where could these possibly be?</p>	<p>The overall aim is to reduce traffic growth but the short-term increase may result in parking shortages.</p> <p>Romford does have green spaces for example the area around St Edward's Church.</p> <p>The AAP aims to ensure that redevelopment of existing sites such as Angel Way, Como Street and Bridge Close includes the provision of public open spaces.</p>

Connecting Romford

Issue / Option	Consultee	Summary of Comments	Council's recommended response
Connecting Romford	Havering Heritage	<p>The focus of considerable interchange ... yet buses do not serve the station or Western Road after 9.30pm and passengers are not given any guidance thereon! "stops ... cluster various locations" including 17 routes at one stop in Western Road (yet not served after 9.30pm).</p> <p>East London Transit – this is not defined anywhere.</p> <p>Para 5.4 See above note re. Interchange and 9.30pm comment</p> <p>Para 5.5 Crossrail – this can now be ignored?</p> <p>Para 5.6 Bus – East London Transit – comments are unhelpful. How can this 'dream' even be considered without detailed knowledge at present unobtainable to the general travelling public</p> <p>Para 5.7 Bus lanes in North Street and Oldchurch Road at present are misleading – small metal notices on the pavements – N S e.g. 4pm to 7pm etc. and none in Oldchurch Road cause confusion to drivers. Very little of the Ring Road is used at present by buses except Western Road to North Street.</p> <p>Para 5.8 The recently constructed Liberty Car Park shows poor technical foresight with cars having to cross the Western Road bus route areas to gain access and admittance (see P.25 Para 5.16).</p>	<p>Comments noted.</p> <p>ELT is covered on page 21.</p> <p>Comments noted.</p> <p>Crossrail is still planned.</p> <p>ELT is covered on page 21 of the Preferred Options Report</p> <p>Comments noted.</p> <p>Bus priority scheme being considered for Western Road to improve access for buses.</p>
Connecting Romford	Transport for London (TfL)	<p>TfL objects to original option 1E not being taken forward as a preferred option. The Local Implementation Plan process is not the only mechanism to secure funding for bus priority. Section 106 funding will also be important as recognised in paragraph 5.7 of the preferred options report. A policy recognising the importance of this issue in the Area Action Plan will be essential to secure funding from all sources.</p>	<p>This option is not being taken forward into the Submission Document. The LIP funding process will be used to secure bus priority measures into and around Romford town centre. In addition, Core Policy CP10 (Sustainable Transport) strongly promotes sustainable modes of transport. In particular, CP10 highlights improvements to the bus network and that contributions for improvements to public transport will be sought.</p>

Issue / Option	Consultee	Summary of Comments	Council's recommended response
ROM1A: Romford Station	Bellway Homes	[Support policy]	Support welcomed.
ROM1A: Romford Station	Havering Heritage	See comments re. 9.30pm above. What of the Platform 1 Upminster Line which once had its own entrance on the eastern side of South Street?	Comments noted.
ROM1A: Romford Station	London Buses	[Support policy]	Support welcomed.
ROM1A: Romford Station	London Fire & Emergency Planning	[Support policy]	Support welcomed.
ROM1A: Romford Station	London TravelWatch	We would particularly like to see the integration of the railway station with the bus station and the environment of both much improved. Particular attention should be paid to improving access for the disabled, an issue already highlighted by the Crossrail Parliamentary Committee.	Comments noted. ROM1A does seek to address this.
ROM1A: Romford Station	Network Rail	Network Rail supports the preferred option for Romford Station (ROM1A). The redevelopment of the station to create an improved transport interchange and a better gateway to Romford accords with Network Rail's own aspirations for the station. The Cross rail project will deliver some of the listed enhancements.	Support welcomed.
ROM1A: Romford Station	TfL	Transport for London (TfL) supports the preferred option for Romford Station (1A), in particular the intention to improve access from the street and to increase bus stand capacity. It is important that the provision of additional bus stand capacity is brought forward at an early stage, even if other elements of the planned interchange are delayed.	Support welcomed.
ROM1B: East London Transit	Bellway Homes	[Support policy]	Support welcomed.
ROM1B: East London Transit	Havering Heritage	More information is needed especially as to an interchange <u>on</u> Main Road (an area not served by the ELT?).	ELT is proposed to go along Main Road to Harold Hill.
ROM1B: East London Transit	London Buses	[Support policy]	Support welcomed.
ROM1B: East London Transit	London Fire & Emergency Planning	[Support policy]	Support welcomed.
ROM1B: East London Transit	London TravelWatch	We are particularly keen to see further developments in Romford town centre address the problems of penetration of bus services into the centre where the passenger objectives are. We hope that the development of the East London Transit will provide an opportunity for public transport vehicles to use South Street throughout and High Street.	ELT will do this. Bus route via Angel Way and High Street is being considered.
ROM1B: East London Transit	TfL	Although TfL supports preferred option ROM1B (East London Transit), the location of the stops and interchanges will need to be the subject of further feasibility work as the scheme is developed. In advance of East London Transit, consideration should be given to improving bus penetration of the town centre, which would enable buses to be diverted away from the most congested sections of the ring road and provide better access to the heart of the town centre.	See above re. bus penetration.

Issue / Option	Consultee	Summary of Comments	Council's recommended response
		<p>For information, paragraph 5.6 of the preferred options report contains some inaccuracies, and TfL considers the following paragraph to be more appropriate:</p> <p>“The first phase of the East London Transit scheme will connect Ilford to Dagenham Dock via Barking town centre and is due to be operational in 2007/08. Later phases of the scheme could extend through to Rainham, Elm Park and Romford, with separate routes to Collier Row and Harold Hill. On opening, the scheme will be bus based and involve high levels of priority and segregation where this is feasible. Any extension of East London Transit to Romford is not expected to be implemented before 2015. Nevertheless, because this is still within the timeframe of the AAP it needs to consider how the East London Transit can best be integrated into the future planning of the town centre”.</p>	<p>Comments noted. Text to be amended in Submission Document.</p>
ROM1D: Brewery Bus Station	Bellway Homes	[Support policy]	Support welcomed.
ROM1D: Brewery Bus Station	Havering Heritage	Safety issue for pedestrians (see HH letter 23 August to Peter Hall).	Comments noted.
ROM1D: Brewery Bus Station	London Buses	[Support policy]	Support welcomed.
ROM1D: Brewery Bus Station	London Fire & Emergency Planning	[Support policy]	Support welcomed.
ROM1D: Brewery Bus Station	London TravelWatch	The Brewery bus station is on the wrong side of the car park which is hazardous for pedestrians to cross. If bus use is to be encouraged bus stops and stations should be located to cater for passengers transport objectives.	Comments noted (see below).
ROM1D: Brewery Bus Station	TfL	TfL supports preferred option ROM1D to provide a more convenient bus station facility at the Brewery site. TfL also supports preferred option ROM8A, which is relevant to the Brewery site, in particular the proposals for enhanced integration with the station and town centre and the review of parking provision.	<p>Support welcomed</p> <p>ROM1D will have to be progressed in conjunction with wider changes to the Brewery as outlined in ROM8A.</p>
ROM2: Car Parking	GOL	<p>It is somewhat puzzling that option ROM 2A [Park and Ride] was offered as part of the consultation on this Plan if it could not be delivered through the Plan. As more than half the respondents supported it, you would be advised to make sure that the matter is properly addressed through the Core Strategy. Otherwise, the consultation process is weakened by the inclusion of undeliverable options.</p> <p>Also, it is a bit confusing that the chosen option [ROM2B] seeks to improve use of car parks and ensure provision of car parking in new developments.</p>	<p>Park and Ride will be taken forward through the Development Control Policy DC38.</p> <p>This option is not being taken forward. Although the principle</p>

Issue / Option	Consultee	Summary of Comments	Council's recommended response
		<p>Both the London Plan and the Core Strategy seek to reduce the need to travel by private car so this approach does not appear to comply with the higher level policies and the evidence base that shows the town to be congested.</p>	<p>of this policy, which was designed to maintain public parking levels using less land, remains valid, at this stage it is not possible to identify which car parks could be developed in this way. As such, the policy is not being taken forward as it is dependent on future initiatives and reviews. However, the absence of this policy does not prevent more efficient use of car parking being made in the future if this is considered appropriate based on the evidence available at the time. Car parking standards for new development are set out separately in Annex 5 of the Core Strategy and will apply to Romford town centre: they are not affected by the change.</p>
ROM2: Car Parking	Havering Heritage	<p>See contrary view Para 2.1 "overall traffic growth falling" with Para 3.1 "future parking shortages".</p> <p>Para 5.13 – what about the A12 road?</p> <p>Para 5.16 - Car Parking 'much of this' is surface. Suggest change to 'some' as the Liberty and Angel Way are multi-storey and part of the Brewery also whereas the Mall / ASDA are below ground level.</p> <p>Para 5.17 - Park & Ride systems have several disadvantages:</p> <ul style="list-style-type: none"> a) users carry shopping from shop to bus b) free bus journey or Freedom Bus Pass usage c) safety aspect of cars whilst parked - insurance cover? 	<p>The overall aim is to reduce traffic growth but the short-term increase may result in parking shortages.</p> <p>Noted.</p> <p>Noted.</p> <p>Not planning issues. Park and Ride policy will be taken forward through the Core Strategy.</p>
ROM2: Car Parking	TfL	<p>TfL objects to original option 2C not being taken forward as a preferred option. This should be considered as part of a review of access to and circulation around the town centre. TfL suggests an additional preferred option as follows:</p>	<p>This option is not being taken forward into the Submission Document (see comments on page 9).</p>

Issue / Option	Consultee	Summary of Comments	Council's recommended response
		<p>“Bus priority measures and circulation around the town centre will be considered as part of a review of the operation of the ring road and its approaches”.</p>	<p>Havering's Traffic Manager subject to Transport for London funding will look at measures for reducing congestion on the Ring Road.</p>
ROM2B: Car Parking	Donaldsons (representing Cosgrave Property Group)	<p>Whilst general support is given, further information should be provided on the proposed VMS system. In particular, guidance should be given on the implementation of this proposal.</p>	<p>ROM2B is not being taken forward into Submission Document.</p> <p>Further information on VMS will be provided in submission document.</p>
ROM2B: Car Parking	Bellway Homes	[Support policy]	ROM2B is not being taken forward into Submission Document.
ROM2B: Car Parking	Havering Heritage	<p>It is noted that one PO for car parking in Romford is to investigate the potential for more efficient use of surface car parking – this is at odds with P.32 Para 6.9 which hints at a possibility of removing the existing parking spaces in surface parking area of the Market on non-Market days!</p>	<p>ROM2B is not being taken forward into Submission Document.</p> <p>More efficient use of car parking does not mean more spaces.</p>
ROM2B: Car Parking	London Buses	[Support policy]	ROM2B is not being taken forward into Submission Document.
ROM2B: Car Parking	London Fire & Emergency Planning	[Support policy]	ROM2B is not being taken forward into Submission Document.
ROM2B: Car Parking	London TravelWatch	<p>We welcome proposals for higher intensity use of land used presently for parking; policies for Romford town centre should seek to restrain car trips and replace them by public transport, cycling and walking trips. Similar restraint policies should be adopted for both on and off-street parking in town centres.</p>	ROM2B is not being taken forward into Submission Document.
ROM2B: Car Parking	TfL	<p>In relation to car parking, TfL welcomes the Council's intention to investigate the potential for more efficient use of surface car parking, although the wording of ROM2B should be amended to better reflect London Plan policies. TfL suggests the following:</p> <p>“The Council will investigate the potential for more efficient use of surface car parking as part of a review of town centre parking and access arrangements. Any development should ensure that parking is provided in accordance with guidance in the London Plan and Core Strategy”.</p>	ROM2B is not being taken forward into Submission Document.

Issue / Option	Consultee	Summary of Comments	Council's recommended response
ROM3: Pedestrian and cyclist environment	Havering Heritage	<p>Pedestrians – Para 5.23 and 5.25 (safety) improve conditions – again see my letter of August 23rd to Peter Hall re. the danger of road crossings – Eastern Road / Chandler's Way AND The Brewery (at Waterloo Road)</p> <p>Para 5.27 - North Street is wholly pedestrianised within the Ring Road until the ELT system destroys this aspect (if it is ever built WITHIN such a narrow road (as also South Street suggestion elsewhere). Traffic is not excluded from the Market Place on Market days – this is true only for private vehicles i.e. NON MARKET vehicles. On Market days delivery vehicles to shops and pubs are an obstacle often for pedestrians.</p> <p>Para 5.28 - Original Options – ROM3F – this is confusing – there is no route down Eastern Road to St. Andrews without crossing South Street and Waterloo Road.</p> <p>Para 5.29 - Waterloo Road – new crossing is already planned.</p>	<p>Noted.</p> <p>Noted.</p> <p>Dedicated cycle crossings are being implemented at Eastern Road and Waterloo Road.</p> <p>Noted.</p>
ROM3A: Pedestrian Links	Bellway Homes	[Support policy]	Support welcomed.
ROM3A: Pedestrian Links	Donaldsons (representing Cosgrave Property Group)	Support is given to the improvements to pedestrian links particularly as they will be important to the success of the town centre now and in the future. The policy should also encourage improved links into the Liberty Centre.	Support welcomed.
ROM3A: Pedestrian Links	London Buses	[Do not support policy]	Comments noted.
ROM3A: Pedestrian Links	London Fire & Emergency Planning	[Support policy]	Support welcomed.
ROM3A: Pedestrian Links	London TravelWatch	<p>Members particularly welcome the improvement to street and public spaces to encourage walking. We support the policies and ideas in the Jan Gehl report: <i>Towards a fine City for People</i> sponsored by TfL and the Central London Partnerships to 'create a better balance between pedestrians, cyclists and motor vehicles'. We would like to see at-grade pedestrian crossings rather than improving existing subways. Walking routes that are accessible and convenient, to reach the new Romford Hospital should be planned, particularly to the hospital from Waterloo Road and South Street, as movement to the hospital from the railway station will be quite high.</p>	<p>Comments noted.</p> <p>Pedestrian crossings will be considered as part of the Romford Ring Road study which is being taken forward.</p> <p>■ S106 money has been obtained for crossing to the (old) hospital site. Feasibility of pedestrian crossings is being developed.</p>
ROM3A: Pedestrian Links	TfL	TfL supports preferred option ROM3A, which seeks the improvement of subways, feasibility studies into replacement of the North Street roundabout with a signalled junction and surface level pedestrian crossings, and additional pedestrian crossings around the ring road.	Support welcomed.

Issue / Option	Consultee	Summary of Comments	Council's recommended response
ROM3E: Cycle Routes	Bellway Homes	[Support policy]	Support welcomed.
ROM3E: Cycle Routes	Donaldsons (representing Cosgrave Property Group)	General support is given to the improvements of cycle routes. However, measures are needed to ensure that there is no conflict with pedestrian routes in the town centre. The dedicated cycle routes will need to be clearly marked.	Support welcomed. ROM3A refers to dedicated routes.
ROM3E: Cycle Routes	London Buses	[Support policy]	Support welcomed.
ROM3E: Cycle Routes	London Fire & Emergency Planning	[Support policy]	Support welcomed.
ROM3E: Cycle Routes	London TravelWatch	Dedicated cycleways are welcome, however cyclists will still want to use the existing road network. We would therefore want to see safety issues addressed on the existing network. Re-engineering of junctions designed to speed up motor vehicles would be welcome to cyclists.	Support welcomed. Issue is addressed in Development Control Policy DC35 (Cycling).
ROM3E: Cycle Routes	TfL	TfL supports preferred option ROM3E although for consistency with ROM3A it may be helpful if it was stated that improvements will be subject to feasibility work.	Support welcomed. Policy will refer to feasibility studies as suggested.

Cultural Destination Romford

Issue / Option	Consultee	Summary of Comments	Council's recommended response
Cultural Destination Romford	Havering Heritage	This is something NEW as at present Havering Council does nothing to preserve or enhance the town's heritage – the demolition of the present Oldchurch Hospital (and the sale of the park for the new one) is a good example and that the Town Centre (inc. the 'historic' market) does not boast one historic plaque (a fact that Havering Heritage is working on for early remedial action).	Development Control Policy DC67 (Buildings of Heritage Interest) covers buildings of local architectural and historic interest.
ROM4: Cultural uses	Havering Heritage	<p>Para - Romford did not receive its "Royal Charter" at any time! However, Havering did get its Royal Charter in the 15th Century (1465).</p> <p>The 'map' on P.31 is the present offering to the reader – not one area (inc. the Market Place) or street is named! A very poor effort.</p> <p>As to the four 'Listed Buildings':</p> <ul style="list-style-type: none"> • the Lamb PH is decorated distastefully and has lost its Inn sign depicting a Gentleman of the past holding a young lamb on lap • Church House has a hanging sign of three heraldic shields and one such wall sign without any indication of their meaning • The Golden Lion is in very poor condition especially on the North Street side (its history plaque is hidden away on a wall on the first floor. <p>Para 6.5 - The Council undertook an appraisal of the Romford Conservation Areas in 2000 to include Oldchurch Hospital but did not follow this up with specific action. This does not give confidence in the AAP declaration as to possible boundary alterations (we note NOT extensions!)</p> <p>Para 6.6 - Havering Council does not, at present, live up to this acceptance as to its important element and the comment as to the distinguishing Romford (say) from Stratford and Ilford is an insult to both towns – example, Stratford Centre / Abbey and Ilford's Hospital chapel are both superior in content. Be fair!</p> <p>Para 6.7 - Is it not true that market traders have to procure a licence by way of a costly premium? (quote 'traders without sufficient capital').</p> <p>Para 6.8 - Paving: Romford Market. We are always promised a removal of the hazardous and ugly cobbles at the east end of the Market Place. It is a shame that the Market Place mosaics are hardly ever visible being obscured either by market stalls or car parking.</p> <p>Para 6.11 - High Street: Before the AAP is published,</p>	<p>Noted. Text to be amended in submission document.</p> <p>Noted. Map to be improved for submission document.</p> <p>Noted but not planning policy issues.</p> <p>Conservation Area Appraisals are being undertaken.</p> <p>Comments noted.</p> <p>Traders do require a licence but there is not a costly premium involved.</p> <p>Comments noted.</p> <p>Work is progressing on the Museum. An</p>

Issue / Option	Consultee	Summary of Comments	Council's recommended response
		<p>Havering Council ought to finalise its position re. proposed Museum and enlighten residents accordingly</p> <p>Paras 6/12/13/14 - One result of the many clubs and bars in South Street is the fact that the western pavement of Chandler's Way is not available to pedestrians as this is constantly covered with receptacles for bottles and food waste and other rubbish. Despite many Havering Council promises over recent years NO ACTION appears to have been (or being) taken to remedy this ugly area.</p> <p>Page 34 - ORIGINAL OPTIONS: It is NOTED that ROM4B "locally listed buildings are only referred to later in the context of "consultation response". This suggests the AAP would not consider retentions! (see p.35 para 6.17).</p>	<p>application will be made to the Heritage Lottery Fund for the museum, the lease and sub-sub-lease have been signed with Havering Museum Limited, an audience development access plan has been carried out, and the museum designers have published detailed designs for the museum.</p> <p>Noted but this is a Streetcare issue not planning policy.</p> <p>Development Control Policy DC67 covers buildings of historical and/or architectural interest.</p>
ROM4A: Respecting the historic environment	Bellway Homes	[Support policy]	Support welcomed.
ROM4A: Respecting the historic environment	London Buses	[Support policy]	Support welcomed.
ROM4A: Respecting the historic environment	London Fire & Emergency Planning	[Support policy]	Support welcomed.
ROM4C: Market Place	Bellway Homes	[Support policy]	Support welcomed.
ROM4C: Market Place	London Buses	[Support policy]	Support welcomed.
ROM4C: Market Place	London Fire & Emergency Planning	[Support policy]	Support welcomed.
ROM4C: Market Place	London TravelWatch	We wonder whether rather than the eastern end near the ring road, the busier western end outside St Edwards Parish Church would be more appropriate as an event place and focal point.	The western end of the market place is not considered an appropriate location for an event space, particularly given its proximity to St Edward the Confessor church.

Issue / Option	Consultee	Summary of Comments	Council's recommended response
ROM4E: Day and Evening Economy	Bellway Homes	[Support policy]	Support welcomed.
ROM4E: Day and Evening Economy	Donaldsons (representing Cosgrave Property Group)	Support is given to the AAP's promotion of the diversification of the daytime and evening economy, particularly in the identification that more family friendly facilities should be attracted to the town centre and the proposed reduction in the concentration of licensed premises.	Support welcomed.
ROM4E: Day and Evening Economy	GLA	The successful implementation of the above option will require a pro-active and integrated approach to managing the night time economy. The detailed policy formulation should seek to avoid the mixing of noisy and noise-sensitive uses in close proximity, where mitigation may not be sufficiently effective. The routes used by venue patrons, especially late at night, also need to be taken into consideration and an appropriate approach adopted to manage the impacts of this. This most successful approach to managing the night time economy will involve integration with measures outside of the planning system. The Mayor has recently published draft Best Practice Guidance on managing the Night Time Economy. This should be taken into account as the preferred options are taken forward to the submission stage.	Comments noted. Proposed policy to refer to the Best Practice Guidance and the issue of noise.
ROM4E: Day and Evening Economy	GOL	This policy option is an example of where the Plan is not linking up the plans of different agencies and providing the certainty mentioned in paragraph 3 of the covering letter. The policy option says that sites for youth facilities will be investigated. Surely, if the Plan is to be of value, it should actually identify what facilities will be provided and funded and where they will be located.	As work is ongoing between Youth Services and Property Services to find a suitable location / property for the Youth Supercentre and funding for the scheme has yet to be agreed this will not be included in the submission document policy. However, Development Control Policy DC26 (Location of Community Facilities) does allow for the provision of youth facilities in Romford town centre.
ROM4E: Day and Evening Economy	London Buses	[Support policy]	Support welcomed.
ROM4E: Day and Evening Economy	London Fire & Emergency Planning	[Support policy]	Support welcomed.

Commercial Romford

Issue / Option	Consultee	Summary of Comments	Council's recommended response
Commercial Romford [paragraph 7.4]	Donaldsons (representing Cosgrave Property Group)	Whilst the paragraph identifies that the AAP will focus in more detail on the retailing needs in Romford it does not provide an overall policy on retailing within the town centre. The AAP should provide more guidance on how it intends to deliver the 30,000 sqm of comparison floorspace identified in the retail capacity study.	Comments noted. Submission document includes a new overall policy on retailing (ROM9: Romford: Metropolitan Shopping Centre).
ROM5: South Street	Havering Heritage	Quote "Key pedestrian route". What of the proposed ELT scheme?	South Street can be both.
ROM5A: South Street	Bellway Homes	[Do not support policy]	Comments noted.
ROM5A: South Street	London Buses	[Support policy]	Support welcomed.
ROM5A: South Street	London Fire & Emergency Planning	[Support policy]	Support welcomed.
ROM5A: South Street	London TravelWatch	Given our comments above which promote a more people friendly Romford with better access by bus and the sustainable modes, some of the detail contained in these options should change. We would want to see South Street accessible for buses.	Comments noted. ELT will use South Street.
ROM5B: South Street (Use Classes)	Bellway Homes	[Do not support policy]	Comments noted.
ROM5B: South Street (Use Classes)	London Buses	[Support policy]	Support welcomed.
ROM5B: South Street (Use Classes)	London Fire & Emergency Planning	[Support policy]	Support welcomed.
ROM5B: South Street (Use Classes)	London TravelWatch	[Comments as for ROM5A].	[see above].
ROM6A: North Street (Retail Core)	Bellway Homes	[Support policy]	Support welcomed.
ROM6A: North Street (Retail Core)	London Buses	[Support policy]	Support welcomed.
ROM6A: North Street (Retail Core)	London Fire & Emergency Planning	[Support policy]	Support welcomed.
ROM6B: North Street (Retail Fringe)	Bellway Homes	[Support policy]	Support welcomed.
ROM6B: North Street (Retail Fringe)	London Buses	[Support policy]	Support welcomed.
ROM6B: North Street (Retail Fringe)	London Fire & Emergency Planning	[Support policy]	Support welcomed.
ROM7: High Street	Havering Heritage	Para 7.29 - High Street: It is never emphasised that this was the key route from London and historically included the original site of The Woolpack Inn (before	Comments noted.

Issue / Option	Consultee	Summary of Comments	Council's recommended response
		<p>being demolished and rebuilt at its present site) and the Queen's House and the doorway to the Market Place.</p> <p>Para 7.34 - It was understood that there is NO official exit for vehicles from the MP [Market Place] over 'N S E W' crossroads into High Street. This needs clarification.</p>	<p>This access is only available to market traders on market days outside 10am to 4pm.</p>
ROM7B: High Street	Bellway Homes	[Support policy]	Support welcomed.
ROM7B: High Street	London Buses	[Support policy]	Support welcomed.
ROM7B: High Street	London Fire & Emergency Planning	[Support policy]	Support welcomed.
ROM8A: The Brewery	Bellway Homes	Do not support policy - opportunity for centrally located mixed use / housing development.	Comments noted. Brewery policy to include reference to residential development.
ROM8A: The Brewery	Havering Heritage	<p>See my letter to Peter Hall – August 2006 re. pedestrian safety. Preferred Option P7.40 (see comment 7.35 above).</p> <p>What are "active frontages"? This tag needs clarification.</p>	<p>Noted.</p> <p>An active frontage is a frontage to a development that contains windows, entrance doors, shopfronts etc that adds interest to pedestrians rather than blank walls.</p>
ROM8A: The Brewery	London Buses	[Support policy]	Support welcomed.
ROM8A: The Brewery	London Fire & Emergency Planning	[Support policy]	Support welcomed.
ROM8A: The Brewery	London TravelWatch	We support this option, but particularly want to see the area less dominated by private vehicles.	<p>Support welcomed.</p> <p>The preferred option refers to a review of car parking provision.</p>
ROM8A: The Brewery	Network Rail	Network Rail supports the inclusion of the need for better linkages to be provided to the station from the brewery site as part of its redevelopment. It would be reasonable for the future development of this area to contribute towards the provision of better linkages to the station.	<p>Support welcomed.</p> <p>This will be included in proposed policy.</p>
ROM9A: Romford Office Quarter	GLA	This option seeks to increase office accommodation by promoting higher densities and encouraging mixed use including residential. This approach is consistent with the London Plan policy aspirations to encourage mixed use of town centres. However, it should be noted that the East London Sub-Regional Development Framework states that the vitality and viability of	<p>Comments noted.</p> <p>Havering Employment Land Review 2006 identifies that demand for office space in Romford will increase.</p>

Issue / Option	Consultee	Summary of Comments	Council's recommended response
		Metropolitan town centres will be driven by a suitable retail offer, a consolidated office market, as well as significant housing as anticipated in Romford. Intensification of office accommodation will therefore need to be balanced against the demand and supply of offices and retail floorspace in Romford and the provision of housing. Data from the 2004 town centre health checks indicates that there is capacity to accommodate some of East London's need for new retail floorspace in Romford. The London Office Policy Review 2006 indicates that there is limited office capacity for Romford.	The submission document includes a new policy (ROM9 - Romford: Metropolitan Shopping Centre) which highlights the need to meet future growth in retailing floorspace in Romford.
ROM9A: Romford Office Quarter	Bellway Homes	[Support policy]	Support welcomed.
ROM9A: Romford Office Quarter	Havering Heritage	Office quarters – Pedestrian safety – again see my letter to Peter Hall.	Noted.
ROM9A: Romford Office Quarter	London Buses	[Support policy]	Support welcomed.
ROM9A: Romford Office Quarter	London Fire & Emergency Planning	[Support policy]	Support welcomed.

Liveable Romford

Issue / Option	Consultee	Summary of Comments	Council's recommended response
ROM11B: Housing Supply	Bellway Homes	[Support policy]	Support welcomed.
ROM11B: Housing Supply	GLA	The option to increase housing in the town centre, by intensification, mixed use, and better utilisation of space above existing premises, is supported by the London Plan. However, the preferred option does not specifically address the impact of noise (both from venues and from people in the street) from the evening entertainment sector. If more people, and particularly families, are to be attracted to live in the centre, careful design and location of both residential and entertainment premises will be essential to strike an acceptable balance between the needs of patrons and those of residents.	Comments noted. Submission policy will refer to the Mayor of London's Best Practice Guidance on Managing the Night Time Economy and the issue of noise.
ROM11B: Housing Supply	London Buses	[Support policy]	Support welcomed.
ROM11B: Housing Supply	London Fire & Emergency Planning	[Support policy]	Support welcomed.
ROM11B: Housing Supply	Thames Water Property Services	Developers should be required to demonstrate that there is adequate infrastructure capacity on and off the site and that the proposed development will not have an adverse impact on existing customers. Even small infill development and brownfield redevelopment can have a significant impact on the infrastructure, and if necessary, developers would be required to fund impact studies and upgrading of the network. On brownfield sites there may be existing assets crossing the site. In such cases the developer would be required to pay for any mains diversions and new off-site infrastructure.	This is covered in Development Control Policy DC52 (Water Supply, Drainage and Quality).
ROM11B: Housing Supply	Donaldsons (representing Cosgrave Property Group)	[Support policy]	Support welcomed.
ROM12A: Family accommodation	Bellway Homes	[Do not support policy]	Comments noted.
ROM12A: Family accommodation	London Buses	[Support policy]	Support welcomed.
ROM12A: Family accommodation	London Fire & Emergency Planning	[Support policy]	Support welcomed.
ROM13D: Affordable Housing	Bellway Homes	[Do not support policy]	Comments noted.
ROM13D: Affordable Housing	GLA	The preferred option is to apply the borough wide affordable housing target to developments in the town centre. The borough wide policy seeks a minimum of 35% of all new homes to be built as affordable. The	The affordable housing policy in the Core Strategy and Development Control

Issue / Option	Consultee	Summary of Comments	Council's recommended response
		Mayor has previously objected to the proposed borough wide affordable housing target of 35% in the preferred options for Havering Council's Core Strategy, on the grounds that the variation from the London Plan 50% affordable target had not been sufficiently justified. The objection noted that only 12.5% of the existing stock in Havering is social housing provision – one of the lowest proportions in London.	Policies will apply to Romford Town Centre.
ROM13D: Affordable Housing	London Buses	[Support policy]	Support welcomed.
ROM13D: Affordable Housing	London Fire & Emergency Planning	[Support policy]	Support welcomed.
ROM14: Green Space and River Corridors	GLA	<p>These policy aspirations are broadly supported. However, the draft Area Action Plan does not yet provide a coherent context for improving the open space network. The approach of the Area Action Plan would be improved by the inclusion of a map that shows the existing open spaces and linkages, and possibilities for improvements. This would assist in making the requirements for any development proposals clear. For example, the opportunity to open up the River Rom is a key element, but where the opportunity exists or what sites it may affect is not clear.</p> <p>Reference to the East London Green Grid should also be included in the Area Action Plan. As part of the Further Alterations to the London Plan the Mayor will be producing supplementary planning guidance on the Green Grid, which is expected to be published later this year for consultation. Initial work on the Green Grid indicates that Romford town centre is within a deficiency area for a local park and access to a nature conservation site. The detailed policies of the Area Action Plan will need to address these deficiencies. For example, the Area Action Plan should make it explicit that new open spaces and links should be connected into the wider network.</p> <p>The Area Action Plan should seek the provision of a range of children's play facilities in the town centre, to be included with new developments and in association with new and improved open spaces. This is particularly important given the aspirations stated in the Area Action Plan for some family housing to be located in the town centre.</p> <p>Improving the soundscape is also relevant to this section of the Area Action Plan. Green spaces need to be (relatively) quiet and acoustically, as well as visually, attractive places. Open spaces in the town centre should therefore aim to include attractive soundscape features, such as moving water.</p>	<p>Comments noted. Submission document to include a map of the open space network as suggested and a map showing the three River Rom sites (Angel Way, Bridge Close and Como Street). Proposals Map will show River Rom opportunities</p> <p>Submission policy will include reference to the importance of connections with the wider green space network.</p> <p>Development Control Policy DC20 (Access to Recreation and Leisure including Open Space) addresses children's play space.</p> <p>Noted</p>

Issue / Option	Consultee	Summary of Comments	Council's recommended response
ROM14: Green Space and River Corridors	Havering Heritage	<p>Para 8.26 - St. Edward's gardens – is an anomaly – this is a VERY small (post cemetery) behind the Church and is at present used for public urinal purposes (a quote from a leading St. Edward's parishioner), druggies and drinkers – it is hidden from gaze. How can this area be improved to enhance and interpret Havering's historic identity. Havering Heritage is intrigued!</p> <p>Para 8.27 - Preferred Option (Page 64 ROM14B) Havering Heritage has no knowledge of this Nature Conservation area and would be interested to have further information before forming an opinion.</p> <p>Para 8.28 - The possibilities put forward are mind boggling and Havering Heritage would be interested in having further information before forming an opinion.</p> <p>Cycle routes: as envisaged are encouraged PROVIDED cycling is banned within the parks as is the case in Hylands Park (Hornchurch). Council by-laws need to be re-addressed (see Geoff Pepper's letter to me).</p>	<p>This space can be made more attractive by stopping the quoted activities taking place.</p> <p>This nature conservation area is identified as a Site of Interest for Nature Conservation by the GLA.</p> <p>The Proposals Map which will accompany the Submission Romford Area Action Plan will show where the opportunities are for enhancing the River Rom</p> <p>Noted</p>
ROM14: Green Space and River Corridors	Natural England	<p>Paragraph 8.27 - Page 61 in relation to ROM 14: Green Space and River Corridors mentions possible opportunities to increase biodiversity in the area between Bridge Close and the Railway, which is welcomed and supported, and the following may be of use;</p> <p>The identification of opportunities for the creation or restoration of habitats or features of value to wildlife such as wildlife friendly landscaping, green roof, naturalistic wetland features associated with sustainable urban drainage schemes delivery could be assisted by the following websites</p> <p>Design for Biodiversity http://london.gov.uk/mayor/strategies/biodiversity/doc/designforbiodiversity.pdf</p> <p>Biodiversity by Design http://www.english-nature.org.uk/pubs/publication/PDF/TCPAbiodiversityguide.pdf</p>	Support welcomed and comments noted.
ROM14A: Greening Romford (Tree Planting)	Bellway Homes	[Do not support policy]	Comments noted.

Issue / Option	Consultee	Summary of Comments	Council's recommended response
ROM14A: Greening Romford (Tree Planting)	London Buses	[Support policy]	Support welcomed.
ROM14A: Greening Romford (Tree Planting)	London Fire & Emergency Planning	[Support policy]	Support welcomed.
ROM14A: Greening Romford (Tree Planting)	Thames Water Property Services	[Support policy] Thames Water recognises the environmental benefits of trees and encourages the planting of them. However, the indiscriminate planting of trees and shrubs can cause serious damage to the public sewerage system. In order for these public sewers to operate satisfactorily trees and shrubs should not be planted over the route of sewers.	Support welcomed and comments noted.
ROM14B: River Rom	Bellway Homes	[Do not support policy]	Comments noted.
ROM14B: River Rom	London Buses	[Support policy]	Support welcomed.
ROM14B: River Rom	London Fire & Emergency Planning	[Support policy]	Support welcomed.
ROM14C: New Green Features and Spaces	Bellway Homes	[Do not support policy]	Comments noted.
ROM14C: New Green Features and Spaces	Donaldsons (representing Cosgrave Property Group)	Whilst we generally support the greening of the town centre the policy (or accompanying text) should acknowledge that the primary function of the retail core will be shopping [and] the requirements of Policy ROM14C should not conflict with this function.	Support welcomed. Policies are complimentary.
ROM14C: New Green Features and Spaces	London Buses	[Support policy]	Support welcomed.
ROM14C: New Green Features and Spaces	London Fire & Emergency Planning	[Support policy]	Support welcomed.
ROM14C: New Green Features and Spaces	Thames Water Property Services	[Support policy - comments as for ROM14A]	Support welcomed.
ROM 14D: Existing Green Spaces	Bellway Homes	[Do not support policy]	Comments noted.
ROM 14D: Existing Green Spaces	London Buses	[Support policy]	Support welcomed.
ROM 14D: Existing Green Spaces	London Fire & Emergency Planning	[Support policy]	Support welcomed.

Issue / Option	Consultee	Summary of Comments	Council's recommended response
ROM15A: Tall Buildings	Bellway Homes	[Do not support policy]	Comments noted.
ROM15A: Tall Buildings	Donaldsons (representing Cosgrave Property Group)	<p>Whilst support is given to the introduction of a tall buildings policy within the AAP, further clarification should be provided. A plan should accompany the AAP which identifies broad locations where tall buildings will be acceptable.</p> <p>The policy should clarify what 'near Romford Station' means.</p> <p>Policy ROM11B within the AAP identifies that the Liberty and the Mall have an opportunity to intensify to provide residential accommodation. In order to do so, the Tall Buildings policy should not preclude tall buildings in these locations.</p>	<p>As currently written the policy strikes a balance between clarifying broad locations and the flexibility for development in other schemes.</p> <p>'Near Romford Station' means within the Romford Office Quarter or within Site Specific Allocation 6.</p> <p>The policy does not preclude tall buildings in other locations providing they meet the guidance set out in Development Control Policy DC 66 (Tall Buildings).</p>
ROM15A: Tall Buildings	GLA	<p>The identification of appropriate locations for tall buildings is consistent with the London Plan. The London Plan acknowledges that Councils may wish to identify defined areas of special character that may be sensitive to tall buildings. However, the Area Action Plan should not preclude the possibility of tall buildings outside the locations specified. The Area Action Plan should apply policy criteria, consistent with London Plan Policies 4B.9 to all applications for tall buildings in the town centre.</p> <p>The references for all tall buildings to be of exemplary high quality and inclusive design are welcomed. However, the absence of reference to sustainable design and construction, energy efficiency and renewable energy is of concern (see comments below).</p>	<p>DC 66 allows for tall buildings to be built outside of Romford town centre in exceptional circumstances. This will also apply to Romford town centre outside of the suggested locations.</p> <p>Development Control Policies DC50 (Sustainable Design and Construction), DC51 (Renewable Energy) and DC62 (Access) will apply to tall buildings.</p>
ROM15A: Tall Buildings	London Buses	[Support policy]	Support welcomed.
ROM15A: Tall Buildings	London Fire & Emergency Planning	[Support policy]	Support welcomed.
ROM15A: Tall Buildings	Network Rail	Network Rail supports the inclusion of the provision for tall buildings near Romford Station. The Cross Rail scheme will deliver some of the public realm/access enhancements sought by the Council but in order to maximise these it is essential for the development potential of the land around the station to be increased to encourage redevelopment. The potential to provide	Support welcomed.

Issue / Option	Consultee	Summary of Comments	Council's recommended response
		a tall building development at the station should be encouraged as such development can incorporate enhancements to the bus interchange facility.	
ROM15B: Urban Design	Bellway Homes	[Support policy]	Support welcomed.
ROM15B: Urban Design	GLA	<p>The preferred option to require high quality design-led development in the town centre is supported. However, the preferred option does not include reference to sustainable design and construction, or to energy efficiency and renewable energy. These matters need to be considered and incorporated from the earliest stages of the design process. The need to use design and internal building layouts to minimise the potential for noise conflicts should also be acknowledged as part of urban design. Whilst the Core Strategy may include policies on these issues, and therefore it will not be appropriate to repeat these in the Area Action Plan, there may be a need for a different approach to these issues in the town centre, and hence variations to the Core Strategy policies included in the Area Action Plan. For example, the mixing of noisy and noise sensitive uses may be more of an issue in the town centre than for other locations in the borough, and there may be scope for a town centre approach to energy provision, for instance through district wide combined heat and power to serve the whole town centre.</p> <p>The draft Area Action Plan, in places, acknowledges the need to intensify development in the town centre. However, it would benefit from a clear policy, perhaps in the urban design section, that seeks to maximise the potential of sites across the whole town centre, as set out in London Plan Policy 4B.3.</p>	<p>Development Control Policies DC50 (Sustainable Design and Construction), DC51 (Renewable Energy) DC55 (Noise) DC62 (Access) apply to tall buildings.</p> <p>The policy makes clear that development should be design-led to meet the criteria and does not preclude maximising the potential of the site.</p>
ROM15B: Urban Design	Havering Heritage	Havering Heritage fully and earnestly supports ROM15B increasing civic pride by instilling a sense of place and it has consistently argued this point which has always (up to now) been negated by Havering Council.	Support welcomed.
ROM15B: Urban Design	London Buses	[Support policy]	Support welcomed.
ROM15B: Urban Design	London Fire & Emergency Planning	[Support policy]	Support welcomed.
ROM15F: Public Spaces	Bellway Homes	[Support policy]	Support welcomed.
ROM15F: Public Spaces	London Buses	[Support policy]	Support welcomed.
ROM15F: Public Spaces	London Fire & Emergency Planning	[Support policy]	Support welcomed.

Site Specific Allocations

Issue / Option	Consultee	Summary of Comments	Council's recommended response
Site Specific Allocations	Barton Willmore (representing North Street Settlement Trust)	<p>Notwithstanding the above, the North Street Settlement Trust supports the broad principles set out in the RAAP, the following amendments are sought::</p> <p>The plan identifies six site specific allocations with development potential in Romford Town Centre. We say that Nos. 23-55 North Street should be identified as a site specific allocation. The redevelopment of Nos. 23-55 North Street will provide much needed new housing within the town centre, making a valuable contribution to the supply, including affordable housing, in Havering.</p> <p>In accordance with PPS12 the RAAP should set out the policies and proposals for actions to preserve or enhance conservation areas, this includes defining areas where specific conservation measures are proposed and areas which will be subject to specific controls over development. We say that whilst the frontages of nos. 23-55 North Street are located within the Romford Conservation Area, a review of the Conservation Area Boundary should be undertaken. A review will demonstrate that the buildings should be removed from the Conservation Area on the basis that the quality and area of this section of North Street is no longer considered to possess the special interest which led to its original designation. In accordance with PPG15 it is important that conservation areas are seen to justify their status and that the concept is not devalued by the designation of an area lacking in special interest. We say that the inclusion of Nos. 23-55 North Street in the Conservation Area Boundary is not justified.</p>	<p>Issue resolved. Planning permission granted at appeal.</p> <p>Conservation Area Character Appraisal and Management Proposals Study are being undertaken.</p>
Site 1: Angel Way	Bellway Homes	[Support policy]	Support welcomed.
Site 1: Angel Way	London Buses	[Support policy]	Support welcomed.
Site 1: Angel Way	London Fire & Emergency Planning	[Support policy]	Support welcomed.
Site 2: Bridge Close	Bellway Homes	[Support policy]	Support welcomed.
Site 2: Bridge Close	London Buses	[Support policy]	Support welcomed.
Site 2: Bridge Close	London Fire & Emergency Planning	[Support policy]	Support welcomed.
Site 3: Como Street	Bellway Homes	[Support policy]	Support welcomed.
Site 3: Como Street	London Buses	[Support policy]	Support welcomed.
Site 3: Como Street	London Fire & Emergency Planning	[Support policy]	Support welcomed.

Issue / Option	Consultee	Summary of Comments	Council's recommended response
Site 4: 18-46 High Street	Bellway Homes	[Support policy]	Support welcomed.
Site 4: 18-46 High Street	London Buses	[Support policy]	Support welcomed.
Site 4: 18-46 High Street	London Fire & Emergency Planning	[Support policy]	Support welcomed.
Site 5: 25-49 High Street	Bellway Homes	[Support policy]	Support welcomed.
Site 5: 25-49 High Street	London Buses	[Support policy]	Support welcomed.
Site 5: 25-49 High Street	London Fire & Emergency Planning	[Support policy]	Support welcomed.
Site 6: Station Gateway and Interchange	Bellway Homes	[Support policy]	Support welcomed.
Site 6: Station Gateway and Interchange	London Buses	[Support policy]	Support welcomed.
Site 6: Station Gateway and Interchange	London Fire & Emergency Planning	[Support policy]	Support welcomed.
Site 6: Station Gateway and Interchange	Network Rail	<p>The station site has been identified as suitable for mixed use; including transport interchange, retail, residential with fringe uses at ground floor level, leisure and commercial. Network Rail supports the inclusion of the Station area (Site 6) in the Area Action Plan as a development site and as a site that may potentially accommodate a tall building. The latter is essential, as there would be considerable costs associated with the site's development. It is likely that any new development will require rafting of the existing station. Obviously the integration of all the aspirations for the site; access and linkages and the Cross Rail enhancements will need to be taken onto account.</p> <p>In view of the high costs of creating a platform for further development it would therefore also be appropriate to note that where schemes are proposed in order to fund transport infrastructure works, which in turn bring wider benefits for the area, then the scale and cost of those works or improvements should be taken into account in negotiations on the overall planning obligation "package". Given the range of public realm and access enhancements sought in the AAP, a requirement to provide affordable housing in conjunction with the site's development may well limit the availability of funds for station/interchange improvements.</p> <p>The Council should retain the flexibility to balance all the social and infrastructure objectives for the borough when considering new development proposals for the development of the station site.</p>	<p>Comments noted. Please note that the boundary of Site 6 has been amended so that it excludes land to the east of South Street. The boundary has been refined because of landownership difficulties on the land on the corner of Victoria Road and South Street and because the land north of the railway is within the Romford Office Quarter and will benefit from this policy designation.</p> <p>Core Strategy and Development Control policy applies. This takes into account viability issues.</p>

General comments

Issue / Option	Consultee	Summary of Comments	Council's recommended response
General Comments	Barton Willmore (representing North Street Settlement Trust)	<p>The proposed policies in the Romford Area Action Plan (RAAP) should stem and have a clear line of conformity with the strategic policies, locational policies and any major area policies in the Core Strategy. The Core Strategy has not been adopted; therefore in our view taking the RAAP beyond the preferred options stage in advance of adoption of the Core Strategy would be premature.</p> <p>In accordance with Planning Policy Statement 12 (PPS12) the RAAP should be a spatial plan and whilst it should be consistent with national planning policy and in general conformity with the London Plan, it should not simply replicate existing local development policies. In our view the RAAP should set out a broad vision for the area, and identify spatial policies and the mechanisms that will bring that vision forward to ensure the success of the Action Area.</p> <p>The RAAP should identify the opportunity sites and related site-specific policies up front. Generic Development Control policies should be set out in the relevant Development Plan Document (DPD) and not replicated.</p> <p>The adopted Havering Unitary Development Plan was adopted in 1993 and is superseded by the London Plan, PPS1, PPG3 and PPG13, so is largely out of date. The Council have previously brought forward SPG and IPG in respect of the Town Centre. Whilst the SPG must be consistent with the UDP (1993), we would question the weight to be attached to the IPG. The adopted UDP does not reflect current national or regional policy and is out of date. In these circumstances, to seek to replicate the IPG policies through the RAAP in advance of a Core Strategy is unsound.</p>	<p>The timetable for preparing the Romford Action Plan has been approved by the Government Office for London is consultation with the Planning Inspectorate.</p> <p>The Romford Area Action Plan does set out a broad vision for the area, and identify spatial policies and the mechanisms that will bring that vision forward to ensure the success of the Action Area.</p> <p>The Romford Area Action Plan only includes those policies which are particular to Romford Town Centre otherwise the policies in the Core Strategy and Development Control Policy DPDs apply.</p> <p>The Romford Area Action Plan has not been prepared in advance of the Core Strategy. The Romford Area Action Plan is a completely separate document to the IPG,</p>
General comments	Barton Willmore (representing North Street Settlement Trust)	The RAAP should describe how the Council proposes to promote, co-ordinate and monitor the visions proposed in the RAAP, particularly in respect of meeting local development scheme targets and milestones and addressing where the Local Development Scheme needs to be updated.	Submission Document will include new information on implementation and monitoring of the plan.
General Comments	Bellway Homes	To bring forward more sites to provide housing. Establish Romford as a commuter site into London as much as its own sustainable community.	The action plan aims to achieve a balance between the needs of

Issue / Option	Consultee	Summary of Comments	Council's recommended response
			commuters and ensuring a sustainable community where people live and work locally.
General Comments	Cluttons (representing The Crown Estate)	<p><u>Park and Ride</u> Paragraph 5.17 states that you are about to undertake a feasibility study into establishing a park and ride system, yet no mention of this is made as a preferred option. Due to the immense pressure on land availability in town centre locations we consider that it should form part of your preferred options. Preferred option ROM 2B states that the Council will investigate the potential for more efficient use of surface car parking in the town centre, yet surely land in the town centre should be prioritised for housing and employment purposes.</p> <p>With this in mind the Crown Estate's land north of the A12 (Marks Warren Farm) may be a suitable park and ride site given its proximity to the metropolitan centre and the A12, its ability to link up with existing transport nodes and the size, nature and current use of the land (see appendix 2). Under PPG3, such a facility is not considered to compromise the openness of the green belt and therefore is deemed a suitable use for this green belt location. Additionally, a park and ride scheme outside of the Area Action Plan designation would free up valuable land in the town centre that can be more pro-actively developed to help bolster the centre's viability and vitality.</p>	<p>Any Park and Ride scheme would be situated outside the boundary of the Romford Area Action Plan. Consequently Park and Ride is covered by Development Control Policy DC38 (Park and Ride).</p> <p>A feasibility study has recently been undertaken into Park and Ride and Cluttons comments were considered during this.</p>
General Comments	Donaldsons (representing Cosgrave Property Group)	The AAP does not put in place an implementation plan. Planning Policy Statement 12: Local Development Frameworks, identifies that a key feature of Area Action Plans will be the focus on implementation. The Council should consider including more information on how they intend to implement the requirements of the AAP within the Submission Draft Document.	Submission Document will include new information on implementation and monitoring of the plan.
General comments	GLA	Part of the town centre is within a flood risk area. This is not reflected in the preferred options, but as stated above, a specific policy may not be necessary in the Area Action Plan if the issue is sufficiently addressed in the Core Strategy . However, it may still be beneficial to acknowledge the flood risk area for the town centre in the Area Action Plan at the submission stage.	The Council has commissioned a Strategic Flood Risk Assessment which is due for completion in November 2007. Flood risk policy is covered by the Core and Development Control Policies. However minor amendments to the Site Specific Allocation policies may be necessary to clarify any flood mitigation measures

Issue / Option	Consultee	Summary of Comments	Council's recommended response
			that are found to be required.
General comments	GLA	Implementation - The delivery and implementation of the Area Action Plan will be a key test of its soundness at the submission stage. The report accompanying the preferred options does in some parts refer to possible methods of implementation. However, in order to meet the key test of soundness, the Area Action Plan will need to include clear mechanisms for implementation at the soundness stage.	Comments noted. Submission Document will include new information on implementation and monitoring of the plan.
General comments	GOL	Whilst the Plan is quite clear as to what is proposed for the town centre over the plan period and how it fits in with the London Plan, Community and Core Strategies, we have some concern about the extent to which it relates to other local plans and strategies. These include both those of the Council and those of other agencies, both public and private funding matter such as transport, health and education provision. For example, there is no evidence in the document that the scale of development proposed is matched by infrastructure provision such as healthcare and other community facilities. Whilst the Report indicates the outcome of the earlier consultation process and the views of bodies such as the Highways Agency, TfL and the LDA, it does not make clear whether the preferred options are at least partly based on "buy-in" from those bodies so that their spending plans match those implied by the policy option. Similarly, it is not clear that the Council's Local Implementation Plan accords with the AAP – it is referred to, but the linkage is not discussed. This is a key issue, which needs to be clarified before the Plan is submitted.	These points will be addressed in the Submission Document. New policy on Social Infrastructure (ROM16) to be included in Submission Document.
General comments	GOL	The Report does show that a significant proportion of policy options have secured majority support from respondents, but have not then be taken forward (as opposed to those amalgamated). It is not always clear why they have been dropped other than that the Council has decided on different course (such as ROM9B) or (eg) a major consultee favours another option. So it does seem that they may not have been reasonable options in first place. It is important that the reasoning is completely clear in case the issue arises at a later stage and to ensure the Plan is sound.	The Council considers that the Preferred Options report makes clear why certain options were not taken forward. The Council endeavoured to ensure that genuine alternative options were consulted on. However in choosing preferred options the public consultation response must be weighed against other factors including the evidence base, the views of those key to the delivery of policies and national and regional planning guidance. The Council must be confident that the

Issue / Option	Consultee	Summary of Comments	Council's recommended response
			'most sound' option is chosen. As an example the Council has decided to take forward ROM9B as the preferred option because it responds best to the Havering Employment Land Review and enables the intensification of the office quarter and therefore the rejuvenation of the existing office stock.
General comments	GOL	The issue of Appropriate Assessment will apply to this Plan and it is important that it is explicitly referred to on submission with evidence of a screening process having been carried out.	The screening process will be carried out on the Submission document.
General comments	GOL	As we have commented in respect of the Core Strategy and other main DPDs, it would be helpful if the Plan showed, in some way, how the Council considers it meets the tests of soundness. This is a useful exercise as you proceed towards preparing the submission version of the Plan and helps ensure that the Plan properly addresses the requirements set out in PPS12.	A soundness self assessment will be submitted alongside the Romford Area Action Plan.
General comments	GOL	In other respects the Report appears clear and the process of reaching the preferred option(s) is understandable. However, we would advise that you keep us informed on how the Plan is progressing after the end of the Preferred Options stage so that we can identify any potential problems before the submission version of the Plan is finalised.	Comments noted.
General comments	GOL	The Area Action Plan appears to have been prepared in accordance with the Local Development Scheme.	Comments noted.
General comments	GOL	Insofar as it is possible to judge, the documents appear to have been prepared in line with the adopted Statement of Community Involvement.	Comments noted.
General comments	GOL	The Plan has had regard to the Council's Community Strategy.	Comments noted.
General comments	GOL	Insofar as it is possible to judge given the early stages of most boroughs LDFs, the various documents are consistent with those being prepared by neighbouring boroughs (and non-London authorities). However, this will need to be made clear to ensure soundness.	Comments noted.
General comments	GOL	Appropriateness of the policies and allocations etc. This is a key issue for soundness. Some of the comments in the covering letter and the specific comments above relate to this point.	Comments noted.
General comments	GOL	The Report does not provide any information about implementation of the Plan and its monitoring. This is a crucial point and must be addressed before the plan is submitted. [Our comments on the Core Strategy will help]	The Submission Document will include information on implementation and monitoring of the plan.
General comments	GOL	The document seems relatively flexible and able to deal with changing circumstances.	Comments noted.

Issue / Option	Consultee	Summary of Comments	Council's recommended response
General comments	Havering Heritage	<p>ALL the site "plans" are extremely poorly illustrated as all street names have been excluded and all indications of identity of areas. NIL POINTS for the presenter of these pages sites 1-6.</p> <p>Overall view: How many members of Romford residents will have ploughed through all these AAP pages as I have without feeling a mental block of despair. We have NOT been encouraged!</p>	<p>Where appropriate, site plans and maps will be redrawn for submission document.</p> <p>Comments noted.</p>
General Comments	Highways Agency	<p>The Highways Agency's interest relates to the trunk road and motorway network that it manages on the Secretary of State's behalf. In the case of Romford this relates to the M25 which is currently seriously congested. Most of the M25 is operating at capacity for much of the day.</p> <p>I would like to refer you to our letters in response to previous Romford AAP consultations on 11 May 2006 and 10 February 2006. The Highways Agency do not have any additional comments at this time.</p>	Comments noted.

Sustainability Appraisal

Issue / Option	Consultee	Summary of Comments	Council's recommended response
Sustainability Appraisal	GOL	The sustainability appraisal has been submitted with the two Preferred Options Reports. It appears to be in line with the guidance set out in the ODPM's document Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks, providing baseline data and fully assessing the impact of various policy options. It is noted that the indicators are wide ranging and should provide a full indication of the impact of the Plan options. We have no comments on its content.	Comments noted.
Sustainability Appraisal	Natural England	The Sustainability Appraisal appears to cover all the points and issues that Natural England would like to see addressed and therefore we would have no further comments to make on this document.	Comments noted.

Appendix 2

Romford Area Action Plan

Submission Document

November 2007

Havering's Local
Development Framework



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1 Introduction


- 1.1 Havering's Local Development Framework (LDF) is a portfolio of documents which have been prepared to provide for the future planning of the borough. The Romford Area Action Plan will provide the planning framework for the future development and regeneration of Romford town centre up to 2020.
- 1.2 Romford is the largest town in Havering and a successful metropolitan shopping centre serving the borough as well as east London and Essex; an important office location; a significant leisure destination, particularly in the evenings, and, increasingly, a residential centre. It has a distinctive historic core around the Market Place which is an important part of its attractiveness as a commercial centre.
- 1.3 The Romford Area Action Plan has been brought forward at an early stage in the LDF process to reflect the continuing priority that the Council and other stakeholders are giving to the regeneration of the town centre and the pressure for further development and new facilities. The Area Action Plan sets out the policies and proposals to deliver growth, stimulate regeneration and protect Romford's assets. It reflects, and builds upon, the extensive work that the Council and its partners have undertaken in preparing the Romford Urban Strategy which was adopted in April 2005. Overall, the Area Action Plan will promote and enhance Romford's position as east London's premier town centre, make the town centre a vibrant place where an increasing number of people want to live and work, and ensure that high quality design-led development contributes positively to Romford's attractiveness as a commercial, cultural and residential town.

2 How to use this document

- 2.1 The Romford Area Action Plan establishes the Council's vision for how the town centre will look in 2020 and the objectives and policies for delivering this.
- 2.2 **Section 2** of this document explains how to use this document and its background.
- 2.3 **Section 3** of this document explains the different documents which comprise Havering's Local Development Framework, their purpose, how they relate to each other, and when they will be prepared.
- 2.4 **Sections 4 and 5** of this document set the context of the Romford Area Action Plan.

In developing the Romford Area Action Plan the Council has not started from a clean sheet of paper. The vision, objectives and related policies within the Area Action Plan have to:

- Be consistent with national guidance in the form of Planning Policy Guidance Notes, Statements and Circulars as issued by the Government
- Be in general conformity with the London Plan prepared by the Greater London Authority.
- Be in support of the Havering Strategic Partnership's Community Strategy and have regard to relevant local strategies.
- Be founded on a robust evidence base. This is an analysis of the relevant background data to help identify the key issues that need addressing.
- Address issues arising from the feedback received from the community and other stakeholders throughout the various consultation initiatives undertaken in preparing the Romford Area Action Plan.

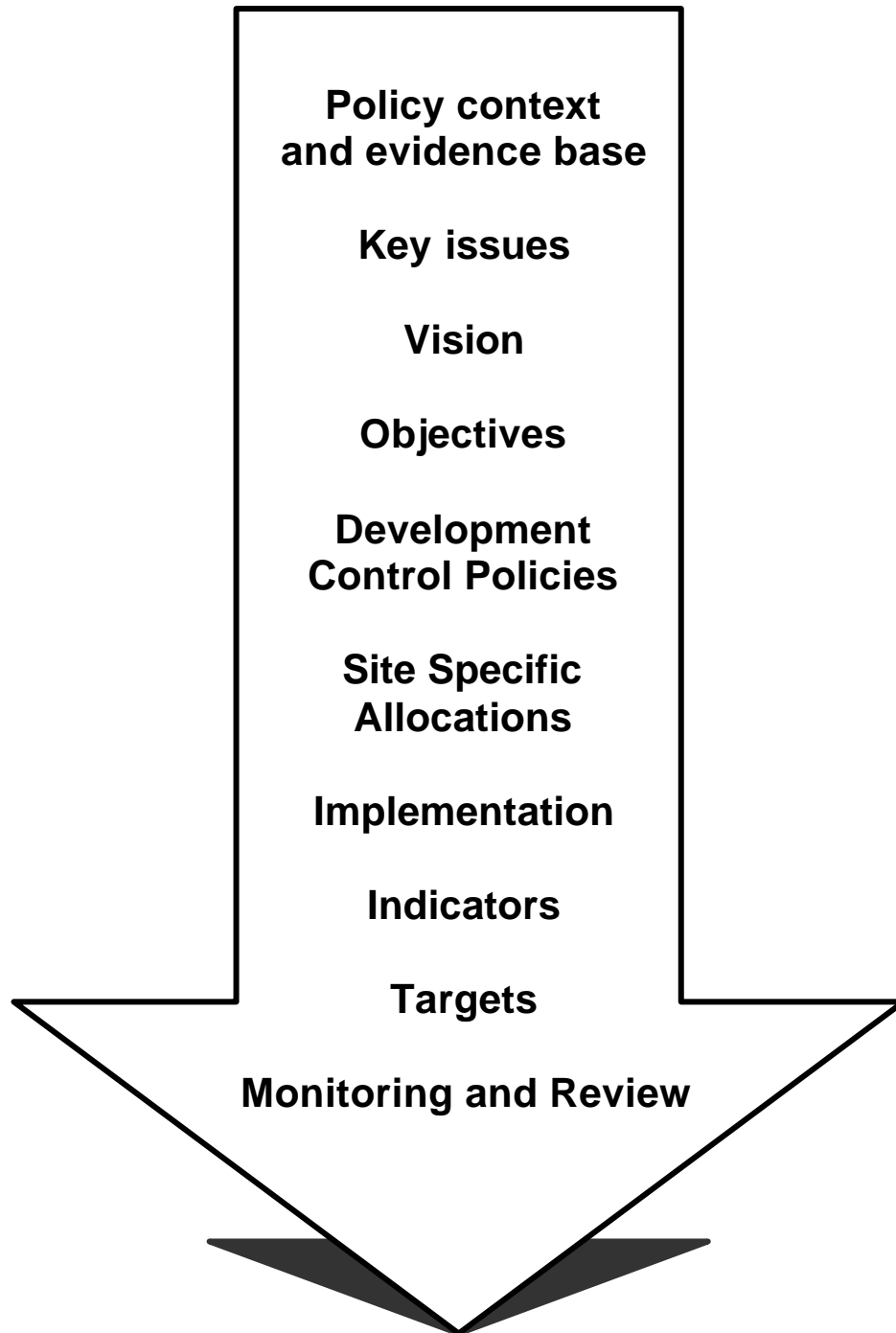


Section 4 explains the national, regional and local policy context within which the Romford Area Action Plan operates.

Section 5 provides a snapshot of Romford town centre, highlighting the key issues the Area Action Plan must address. The evidence base is developed in more detail in the explanation provided for the Area Action Plan policies. However in the interests of keeping this document usable, a lot of the evidence base is 'signposted' rather than repeated.

The whole consultation process and how the responses received have been addressed in developing the Area Action Plan is provided in a separate document called the **Statement of Compliance**.

- 2.5 **Section 6** sets out the Vision for how the Havering Strategic Partnership wants Romford town centre to look in 2020, and a set of objectives is provided in **Section 7** for how this will be delivered. **Section 8** shows Romford's position in East London and the Thames Gateway and the boundary of the Romford Area Action Plan.
- 2.6 The Area Action Plan policies are provided in **Section 9**. These are ordered according to the four key themes they are focused on delivering.
- 2.7 **Section 10** contains the Site Specific Allocations
- 2.8 An overview of the implementation and monitoring strategy for the Area Action Plan is provided in **Section 11**.
- 2.9 The diagram on the following page shows the Golden Thread which runs through this document.



3 Havering's Local Development Framework

- 3.1 Havering's Local Development Framework (LDF) is a collection of documents called Local Development Documents (LDDs) which collectively will guide the future planning of the borough up until 2020. There are two types of Local Development Documents: Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs). DPDs carry more weight as they are subject to an independent examination by a Planning Inspector before they are adopted whereas the Council can prepare and adopt SPDs without any independent scrutiny. All of Havering's LDDs must be in general conformity with the London Plan.
- 3.2 The Development Plan Documents within Havering's LDF, along with the London Plan, comprise the Development Plan for the Borough. If, to any extent, a policy contained within the Development Plan for an area conflicts with another policy in the Development Plan the conflict must be resolved in favour of the policy which is contained in the last document to be approved or published.
- 3.3 To let people know in advance when they can become involved in the preparation of LDDs the Council has produced a document showing the timetable for each LDD it intends to produce over the next three years. This document is called a Local Development Scheme (LDS) and is available to view at: www.havering.gov.uk

Development Planning Documents

- 3.4 As well as the Romford Area Action Plan, the LDS shows that initially the Council will produce the following DPDs:
- Core Strategy and Generic Development Control Policies
 - Site Specific Allocations
 - Proposals Map
 - Joint Waste Plan
 - Gypsies and Traveller Sites
 - Preferred Sites and Preferred Areas for Minerals Extraction

<p>Core Strategy and Generic Development Control Policies (DPD)</p>	<p>This sets out the Council's vision and objectives for the planning of the borough up to 2020 and will provide the framework for all other LDDs, including the Romford Area Action Plan. It also includes a limited number of strategic policies, and more detailed development control policies, which apply across the whole borough. Collectively these policies will set out the planning criteria against which planning applications for the development and use of land and buildings will be considered.</p>
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<p>Site Specific Allocations (DPD)</p>	<p>This will set out the specific allocations for individual sites across the borough. Once the Romford Area Action Plan is adopted, the sites in it will be added to this document.</p>
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<p>Proposals Map (DPD)</p>	<p>This will show the boundary of development control policy designations, and the boundary of Site Specific Allocations in all adopted DPDs.</p>
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<p>Joint Waste Plan (DPD)</p>	<p>Havering is preparing a Joint Waste DPD with the London Boroughs of Barking & Dagenham, Redbridge and Newham, who form the East London Waste Authority. This DPD will conform to the Spatial Strategy set out in Havering's Core Strategy.</p>
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<p>Gypsies and Traveller Sites (DPD)</p>	<p>This will identify gypsy and traveller sites to meet the requirements of Circular 01/06.</p>
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<p>Preferred Sites and Preferred Areas for Minerals Extraction (DPD)</p>	<p>This will identify preferred sites and areas for minerals extraction.</p>
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Supplementary Planning Documents

3.5 These will provide additional guidance to policies in the Core Strategy and, where relevant, will also apply to Romford town centre.

- Sustainable Construction
- Hall Lane, Upminster
- Emerson Park
- Gidea Park
- Hornchurch Centre
- London Riverside
- Educational Needs Generated by Development
- Amenity Space
- Noise
- Protection of Trees During Development
- Havering Conservation Areas: Shopfront Design Guide
- Protecting the Borough's Biodiversity
- Affordable Housing
- Residential Extensions and Alterations
- Heritage
- Designing for Safer Places
- Planning Obligations
- Travel Plans

Relationship to other 'saved' policies

3.6 Havering's Local Development Framework will replace the Unitary Development Plan (UDP) adopted in 1993. The UDP policies were saved for three years from the commencement of the Planning and Compulsory Purchase Act which came into force in September 2004. Table 1 shows which policies will be replaced by the Romford Area Action Plan and which policies will be deleted.

Table 1: Relationship of Romford Area Action Plan to Havering UDP

UDP Policy	Subject	Area Action Plan Policy
ROM1	Additional Retail Floorspace	ROM9: Romford: Metropolitan Centre ROM12: The Brewery
ROM2	Retail Development Sites	Removed
ROM3	Non-Retail Uses in Romford Town Centre	ROM10: Retail Core ROM11: Retail Fringe
ROM4	Refurbishment of the Liberty Shopping Centre	Removed
ROM5	Pedestrianisation of South Street and High Street	Removed
ROM6	Repaving, Planting and Landscaping in South Street and Western Road	Removed
ROM7	Repaving, Planting and Landscaping in the Market Place	Removed
ROM8	Office Development	ROM13: Romford Office Quarter
ROM9	Eastern and Western Road Office Area	ROM13: Romford Office Quarter
ROM10	Leisure Uses	ROM7: Market Place ROM8: Day and Evening Economy ROM12: The Brewery
ROM11	Sites for Town Centre Development	Removed
ROM12	Retention of Housing	ROM14: Housing Supply; and Development Control Policy DC1: Loss of Housing
ROM13	Restraint of Peak Hour Traffic Flows	Removed
ROM14	Increase of Public Off-Street Parking	Removed
ROM15	Car Park between Eastern Road and Western Road	Removed
ROM16	Improved Public Transport Facilities	Removed
ROM17	Licensed Taxi Facilities	Removed
ROM18	Cycle Facilities	Removed

4 Policy context

4.1 The policy context for the Romford Area Action Plan is provided by:

- National planning policy
- Regional planning policy
- Local plans and strategies for the borough

National Planning Policy

4.2 The Government determines national planning policies on different aspects of land use and transport and the rules that govern the operation of the planning system. National planning policies are set out in Planning Policy Statements (PPSs) and Planning Policy Guidance Notes (PPGs), Minerals Policy Statements (MPS) and Minerals Planning Guidance Notes (MPG), Circulars and Parliamentary Statements. Local authorities must take their contents into account in preparing their DPDs by ensuring that the plans and policies within them are consistent with national guidance.

4.3 In preparing the policies and proposals in the Area Action Plan, the Council has had regard to the whole range of national planning guidance where it is relevant to the issues faced in Romford town centre. The current range of national planning guidance can be found at: www.planningportal.gov.uk.

4.4 References to Planning Policy Statements and Guidance in the reasoned justification of the Area Action Plan policies is the most up to date version at the time the policy was written. The Council recognises that these may have been updated or replaced since, and the current versions should be referred to.

The London Plan

4.5 The London Plan (2004) is the Mayor's Spatial Development Strategy and sets out the strategic policy targets for London. Local Development Documents, such as the Romford Area Action Plan, are required to be in general conformity with the London Plan under the Planning and Compulsory Purchase Act 2004 and this constitutes one of the key 'soundness' tests, as set out in paragraph 4.23 of PPS12. The Mayor is committed to reviewing the London Plan to ensure that it remains robust. As such, Draft Further Alterations to the London Plan were published in September 2006 and the Examination in Public of these took place in June and July 2007.

4.6 The London Plan identifies East London as the priority area for new development, regeneration and investment. It sets out a stronger and wider role for town centres to meet the full range of local needs

(including shopping, leisure, housing, local services and jobs) and to strengthen their sense of identity. It aims to deliver the Government's priority for the Thames Gateway for development, regeneration and transport improvement and promote the sub-regions contribution to London's world city role.

- 4.7 The Plan identifies five broad types of town centre and classifies Romford a Metropolitan Centre in Greater London. It suggests that Boroughs should carry out assessments of the capacity of town centres to accommodate additional retail development appropriate to their role within the London network of town centres.
- 4.8 It sets a target of 535 new homes per year for Havering. Through the application of sustainable residential quality principles it identifies those centres with the highest public transport accessibility, such as Romford, for the highest densities.
- 4.9 It promotes the Strategic Industrial Locations framework, which is designed to reconcile demand and supply and to take account of industry's needs. Surplus employment land should help to meet strategic and local requirements for other uses such as education and community activities and, in particular, housing. It also seeks to rejuvenate office-based activities in view of their contribution to the London economy and their role in rejuvenating suburban town centres.
- 4.10 It notes that the majority of journeys in the suburbs will continue to be by car, but bus services, including those making orbital connections around suburban town centres, should be enhanced and the integration of these bus services with rail and Underground services should be improved. Boroughs should promote more effective use of road space for public transport and work with Transport for London (TfL) to develop proposals for light transit systems.
- 4.11 It attaches great importance to making London a more attractive, well-designed and green city through radical improvements in the use of energy, the treatment of waste, the reduction of noise pollution, the improvement of air quality and the promotion of biodiversity. It aims to protect and enhance the quality of the townscape, through historic conservation and enhancing the public realm, open spaces and new resources, reflecting their increased importance in a compact city, enhancing the Blue Ribbon network and protecting enhancing and creating green open spaces. It aims to improve the sustainability of suburban heartlands by improving accessibility between suburban town centres and their hinterlands.

East London Sub-Regional Development Framework (SRDF)

- 4.12 The East London Sub-Regional Development Framework (SRDF) was published in May 2006 and its purpose is to provide guidance on the

implementation of policies in the London Plan in order to help deliver a sustainable and prosperous future for the sub-region.

- 4.13 The SRDF considers the key to accommodating sustainable growth is the ability and effectiveness of the sub-regional town centres to improve their image and vitality through a suitable retail offer complemented with office, leisure, cultural, residential and other facilities.
- 4.14 The SRDF notes that Romford remains the strongest of the town centres in the sub-region despite competition from retail destinations outside London including Lakeside at Thurrock in Essex and Bluewater in Kent. It also notes that Stratford is likely to emerge as a Metropolitan centre alongside Romford and Ilford in terms of scale, role and catchment. The SRDF expects Romford's Metropolitan role to be sustained through both quantitative and qualitative improvements to the retail, culture and leisure offer including integrated approaches to the management of the evening economy and significant new housing provision as part of broader, mixed use policy.

Romford Urban Strategy

- 4.15 The Romford Urban Strategy was adopted by the Council in April 2005 and is a key background document containing an extensive range of information relating to the town centre. It has been used, along with other specific research work such as the Havering Retail and Leisure Study (2006) and the Havering Employment Land Review (2006), to inform the Council's work on developing options and policies for the Romford Area Action Plan.
- 4.16 The Urban Strategy is based on detailed analysis and extensive consultation with members of the public, employees and a wide range of other stakeholders in Romford including the police, landowners, retailers and major commercial employers.
- 4.17 The Urban Strategy seeks to build on Romford's existing strengths, reinforce its historic identity, and capitalise on its strategic location in Thames Gateway London. It aims to create a diverse town centre with a range of activities that cater for all sectors of the community, and for workers, shoppers, visitors and residents alike. This aim is reinforced through four broad strands which incorporate a number of project themes. The four key strands are 'Connecting Romford', 'Cultural Destination Romford', 'Commercial Romford' and 'Liveable Romford'.
- 4.18 Following approval of the Romford Urban Strategy, the Council adopted Interim Planning Guidance (IPG) for Romford town centre in July 2006. This provides non-statutory guidance to supplement policies in the UDP/LDF pending the adoption of the Romford Area Action Plan.

5 Key issues for the Romford Area Action Plan

5.1 This section focuses on the key issues that the Area Action Plan addresses. It first looks at the strategic context for Romford and 'headline statistics' for the town centre and then focuses on key issues for Romford based on the four themes under the which the Area Action Plan is structured:

- Connecting Romford
- Cultural Destination Romford
- Commercial Romford
- Liveable Romford

Strategic context

5.2 Towns and cities are the centres of civilisation, generating economic development and fostering social, cultural, spiritual and scientific advancement. They are, by their nature, dynamic and changing. Each has its own character and beauty, a product of man-made evolution, shaped by the needs of its citizens and users and the demands of the age. Romford is no different and therefore everyone, whether a resident or visitor, has a role to play in helping to create and shape Romford's future. The Area Action Plan is central to this process and offers the opportunity to guide development within the town centre and ensure that Romford is a better place for those people who live in, work in or visit the town

5.3 Romford has thrived in recent years due to its strategic position at the heart of the Thames Gateway and its positive response to the competition offered by Lakeside and Bluewater. Havering Council and the Romford Town Centre Partnership have delivered massive change and investment in the last ten years to see Romford town centre rise to become the largest shopping centre in the sub-region. Not only has Romford substantially improved its traditional retail and leisure offer but it is increasingly becoming a place where people want to live due to its convenient location. The 'headline' statistics bear this out:

- Romford is the fourth largest retail centre in London;
- Romford is one of the top 15 retail centres in the South East;
- Romford is the largest centre in the Thames Gateway and ideally situated to serve new populations;
- Romford's current catchment area extends from Central London to the Essex coast;
- Romford currently attracts over 25 million visitors each year;
- Romford is 15 to 25 minutes away from Liverpool Street by train and is planned to be served by Crossrail and East London Transit in the future;

- Romford Station serves 5.65 million passengers per year;
- Romford is served by in excess of 30 bus routes which provide access to Havering, Redbridge, Barking & Dagenham and Essex;
- Romford is Havering's primary office centre and one of London's few established suburban office centres. 40% of people working in the town centre work in the office sector;
- Romford is increasingly becoming a place to live and is planned to provide a substantial proportion of the borough's new homes by 2020;
- Romford attracts around 15,000 people on weekend nights to its evening economy facilities; and
- Romford has East London's largest and longest established market.

Connecting Romford

Overview

- 5.4 Easy access to and from Romford town centre is extremely important if Romford is to continue to thrive as a place to live and work. In particular, Romford's ability to realise its potential depends upon capturing spend from the growth areas in the Thames Gateway and, in particular, London Riverside. Ease of access is also an important criteria for attracting future employers and is also a key 'driver' for residential development.
- 5.5 The Area Action Plan focuses on how public transport accessibility into, and within, the town centre will be improved, the future strategy for car parking, and how the pedestrian and cyclist environment will be improved. Car and cycle parking standards for new development will be set out in the Core Strategy.

Key issues (Connecting Romford)

Public Transport

- 5.6 Overall, Romford has the greatest level of public transport accessibility within Havering. Romford is the busiest National Rail station in the borough and is the focus of considerable interchange between different modes of transport. Romford is also a major bus hub, offering in excess of 30 different routes, including two night bus services and five school services. The focus for bus activity is along the A124 North Street, the A118 Main Road and South Street. Services offer connections to Canning Town and Stratford to the west, Harlow to the north, Chelmsford and Upminster to the east and Rainham in the south. Stops for these services currently cluster in various locations along the Romford Ring Road and within the town centre.
- 5.7 Whilst public transport provision is good to Romford there is considerable scope for improvement. Romford may be well served by bus and rail, but there is substantial scope for qualitative improvements

to these services in terms of usability, capacity and reliability, as well as further improvements to north-south and cross-London links in the form of the East London Transit and Crossrail. For this reason, the Area Action Plan seeks to improve the Romford Station Interchange, and supports the implementation of East London Transit.

Car use

- 5.8 47% of people who travel to Romford arrive by car, although local bus services account for a significant share (36%) of journeys. Romford offers a substantial amount of car parking, having over 6,000 spaces for vehicles. The main car parks within the town centre include The Liberty, The Mall, The Brewery, Angel Way, the Market Place and Havering Town Hall (weekends only). These spaces are a mixture of surface-level and multi-storey parking.
- 5.9 The continued expansion of Romford as a commercial and residential centre will have to take place in a sustainable way so that traffic demands on the road network are improved and not worsened. Overall, this means that car parking provision will be maintained at current levels. If more people are to be attracted to the town centre then the additional journeys will be encouraged to use more sustainable modes of transport such as walking, cycling and public transport.
- 5.10 Romford town centre, particularly at weekends, suffers from congestion on the Ring Road and its approaches. Traffic congestion in Romford town centre is affecting bus reliability and measures to improve the circulation of the Ring Road will seek to address this. Transport for London (TfL) has a set a target for traffic growth in Havering of 6% between 2001 and 2011 and of 1% growth in Romford for the same period. In 2007 monitoring levels suggest that the borough-wide target is currently on track. The Council is working towards meeting the specific targets for Romford with a programme of specific measures and projects.
- 5.11 Havering has published its Network Management Strategy (NMS) which sets out how it will manage its highway network under the requirements of the Traffic Management Act 2004. The NMS details how Havering will work to reduce congestion levels in the borough and in Romford town centre and the Area Action Plan compliments this.
- 5.12 Congestion also brings with it attendant noise, road safety and air quality concerns and there is a need to improve air quality in the town centre, especially around the Ring Road and North Street, in line with Air Quality Management Area objectives.
- 5.13 Havering, including Romford, will also be included in the Mayor of London's Low Emission Zone (LEZ) to be introduced in February 2008, which aims to improve air quality by deterring the most polluting vehicles from being driven in the area.

Walking and cycling

- 5.14 The pedestrian and cyclist environment is an important issue for Romford town centre and this is recognised in the Local Implementation Plan (LIP), which was adopted in May 2007, and Havering's Walking and Cycling Strategies, which were published in July 2006. Walking and cycling are good for the environment, the community and the individual. Both have the least adverse environmental impacts of all forms of travel, are the most socially inclusive forms of transport and offer proven health benefits (both physical and mental) to the individual.
- 5.15 There is considerable scope to improve conditions for pedestrians and cyclists in and around Romford town centre. Particular attention needs to be given to improving access across and around the Ring Road and improving pedestrian and cycle routes through town centre.
- 5.16 Currently the Ring Road acts as a barrier to pedestrian and cyclist movement and cuts off the heart of the town centre from its suburban hinterland. Remedying this will help encourage more people to walk and cycle into the town centre and cut the number of unnecessary car journeys with potential benefits in regard to reducing congestion, and environmental and amenity benefits. The Ring Road is included in Phase 3 of the Mayor of London's 100 Public Spaces and as part of this programme will include improvements to the pedestrian and cyclist environment. The Council has also secured funding from TfL to undertake a study into access around and across the Ring Road.
- 5.17 Pedestrian access across the Romford Ring Road is predominantly via a number of subways. This assists with vehicle movements on the Ring Road itself but can form a barrier to safe and convenient pedestrian movement. While the subway at Market Place is a good example of a successful, well-used subway, others, particularly at London Road, Oldchurch Road and Waterloo Road, are less popular. Many people prefer to cross the Ring Road at surface level, including at un-designated locations, where they put themselves and motorists at risk. Additional pedestrian crossings on the Ring Road would improve access to the town centre but would need to be considered against any adverse impact on traffic flows. For this reason, the Area Action Plan seeks to improve the pedestrian environment and links into and through Romford town centre and the Council will act on the results of the Ring Road study to help achieve this.
- 5.18 At present, cycle routes through Romford town centre are limited and poorly connected. Some signposted routes for cyclists exist along Victoria Road, Eastern Road and High Street in the town centre and there is also a small section of cycle route in Exchange Street which is separate from traffic. For this reason, the Area Action Plan seeks to improve access to the town centre through the creation of new dedicated cycling routes and to improve the cycling environment

around the Ring Road through a dedicated cycle route segregated, where possible, from traffic.

Cultural Destination Romford

Overview

- 5.19 The Government recognises the particular role of culture as a pivotal focus for community activity and a sense of shared community and local pride in its 'Sustainable Communities: People, Places, Prosperity programme' (2005). Culture is seen as central to having communities in which people want to live and work, both now and in the future. Cultural provision encompasses a wide range of activities from sport and leisure, convenient access to a network of open space, arts and creative activities and industries, and libraries, heritage centres or museums.
- 5.20 The role of culture as an economic driver is recognised in the Mayor's Culture Strategy (2004) which states that the cultural and creative sector is the most dynamic and rapidly growing sector of the economy in London. To promote Romford as a cultural destination the Area Action Plan considers ways of strengthening and diversifying Romford's market and promoting it as a major visitor attraction and managing and diversifying the daytime and evening economy.
- 5.21 The Area Action Plan focuses on how best to preserve or enhance the town centre's heritage and how to sustain and enhance Romford Market and the Market Place. Linked to this, it seeks to diversify the town centre's economy and to meet the needs of those groups, such as young people and families, for which the centre currently offers only limited options, particularly in the evening.

Key issues (Cultural Destination Romford)

- 5.22 Romford's cultural and built heritage is an important element of its attractiveness as a commercial, cultural and residential town centre, and is partly what distinguishes Romford from out-of town shopping centres such as Bluewater and Lakeside.

Heritage

- 5.23 Romford has a fascinating history dating from its origins as a small market town in the Middle Ages through centuries of development and change. The attraction of Romford as a commercial, cultural and liveable town centre is partly due to the evidence of its heritage in the town's built form - the layout of its streets and spaces and the quality of its buildings. The northern section of the town centre bounded by the Ring Road is covered by the Romford Conservation Area which includes Market Place, the north half of South Street, North Street and

High Street. There are four listed buildings within the Conservation Area:

- Parish Church of St Edward the Confessor, Grade II* listed
- The Lamb Public House, Grade II listed
- Church House, Market Place Grade II listed
- The Golden Lion Public House, Grade II listed

In addition, the following listed buildings are within the Romford Area Action Plan boundary:

- Havering Town Hall, Grade II listed
- 96-102 North Street, Grade II listed

The Heritage Strategy for Romford and Hornchurch (2000) identifies Buildings of Local Heritage Interest and the following are situated within the Romford Area Action Plan boundary:

- [Premises formerly] The Woolpack, High Street
- Prudential Building, High Street
- Romford Brewery buildings, High Street
- [Formerly] The White Hart, High Street [now The Bitter End]
- Kingsmead Mansions, Kingsmead Road
- Romford Baptist Church, Main Road
- 28 Market Place
- The Bull, Market Place
- Lloyds Bank, North Street
- St Edward's Catholic Church, Hall & Presbytery, Park End Road
- 95 South Street
- 97 South Street
- 99-103 South Street
- 105-111 South Street
- Odeon Cinema, South Street
- 110 South Street
- 112-116 South Street
- 131 South Street
- Co-op Bank, South Street
- Page Calnan Building, South Street
- Quadrant Arcade, South Street/Market Place
- Romford Station, South Street
- Old Mill Parade, Victoria Road
- Station Parade, Victoria Road

Romford Market

5.24 Romford has East London's largest and longest established market. Throughout its 760-year history, it has been right at the heart of Romford town centre and fundamental to the historic and cultural heritage of Romford and the borough as a whole. The market is key to

the attractiveness of Romford as a destination for shoppers and visitors. The Romford shoppers survey (January 2006) found that 56% of those surveyed rated the market as 'important' or 'very important' in their decision to visit Romford town centre. The market also provides an opportunity for traders without sufficient capital for taking up occupancy of a retail outlet to set up their own business and is an important lever for the business sector in Romford.

- 5.25 Despite a long term reduction in trader numbers of 50% from 339 in 1985 to 170 in 2005, numbers appear to be stable at present. Although the number of available pitches has been reduced over the years, on average three quarters of stalls are occupied by regular licensed traders on Wednesdays, Fridays and Saturdays, while a further 10-20 stalls are taken by casual traders on each market day. In addition, the Farmers market operates twice a month on South Street and the speciality French market visits Romford every Spring, both of which have proved very successful.
- 5.26 The market is also the most important public space in the town, although its potential is not realised at present, particularly on non-market days when it functions solely as a surface car park. Although the shopping malls and concourses attract large numbers of people, the ideal gathering place and opportunity for community interaction and activity is the market place, which is full of character and offers much more than a commercial environment.

Day and evening economy

- 5.27 Romford is a popular leisure and entertainment centre, with 69 restaurants and cafes, 22 pubs and bars, four nightclubs, one cinema (with 16 screens and 4,000 seats) and one bowling alley. 932 people are employed in restaurants and other licensed premises in Romford making this sector one of the most important for jobs and the town's prosperity.
- 5.28 Up to 15,000 people are known to come into Romford on weekend nights, presenting challenges for the management of the evening economy, the police, night time venues, transport providers and communities generally. Generally, entertainment and leisure uses are dispersed throughout the town centre. However, there is a significant concentration of late night entertainment uses located in South Street. These are predominantly music bars with alcohol aimed at 18-25 year customers. While these venues play an important role in the Romford economy the aspiration for the town centre is for an increased residential population and a diversification of the night time economy.
- 5.29 The Area Action Plan aims to ensure that a balance is achieved in recognising the importance of the leisure and entertainment sector and the cumulative effects caused by night entertainment venues. This is particularly important given the planned increase in the residential

population in the town centre. The Council has been working with local operators and the police to manage the night time economy. Three nightclubs have closed in recent years (Hollywoods, Secrets and Tokyo Blue) and these sites are being redeveloped, or have planning permission, for housing. Four nightclubs remain in Romford, the largest of which, Time and Envy, is currently undergoing a £1.5 million refurbishment and is scheduled to re-open as Liquid and Envy in October 2007 (see Table 2).

Table 2: Romford Nightclubs

Venue	Licensed until	Capacity
Brannigans, South Street	02:00	950
Opium Lounge, North Street	05:00	530
Pacific Edge, Market Place	04:30	585
Time and Envy, South Street	04:00	2000

Source: London Borough of Havering (2007)

- 5.30 The Havering Retail and Leisure Study predicts the growth in expenditure on leisure services over the 12 year period 2006 to 2018 is likely to amount to around £139 million, a growth of approximately 24%. Some three-fifths of this growth (£83 million) is likely to be spent on food and drink, which suggests ample scope to further improve the quality of restaurants, particularly in Romford town centre.
- 5.31 There are some family-friendly restaurants in the town centre, particularly in the Brewery, which is also home to a Vue Cinema and the bowling alley. However, it is recognised that in the heart of the town centre an increase in both good standard family-friendly and high quality restaurants will add to the appeal of Romford. The Area Action Plan aims to increase the attractiveness of Romford to all groups. In this regard it will hopefully give confidence to family-friendly and quality operators that Romford is a place for them to invest for the future.

Commercial Romford

Overview

- 5.32 The Draft Further Alterations to the London Plan classify Romford as one of eleven Metropolitan Centres in Greater London¹. In 2003/4 Management Horizons Europe ranked Romford fourth of the metropolitan centres in London; above Ilford, and the highest ranking centre in east London².

¹ Uxbridge was classified as a Metropolitan Centre in the Draft Further Alterations to the London Plan (September 2006). Prior to this, there were ten Metropolitan Centres in London.

² Town centres were rated using a weighted scoring system which takes account of each location's provision of non-food multiple retailers and anchor store strength.

- 5.33 Romford contains over 152,000 sqm gross of retail floorspace. In terms of retail indicators Romford is performing very well and shows evidence of greater investor confidence in the area. Romford already has good representation by national retailers and a number who are not currently in the town are also seeking representation.
- 5.34 Romford has responded positively to the competition offered by the out of town regional shopping centres at Lakeside and Bluewater. It has more retail space and more stores than both and attracts a similar number of visitors each year. The town centre has experienced extensive investment in a range of development schemes and environmental improvements, such as the refurbishment of the Market Place, the Brewery development, refurbishment of the Liberty and Mall centres and the redevelopment of the former Dolphin site.
- 5.35 Romford is also an important office location, employing over 3,000 people in the commercial office sector. Romford's strength as a commercial centre needs to be supported and enhanced in order to ensure the town centre retains its competitive edge in the region.
- 5.36 Having regard to the Havering Retail and Leisure Study³, the Area Action Plan focuses on how to plan for future retailing needs in Romford in order to maintain and enhance its Metropolitan status and how best to rejuvenate the Romford Office Quarter.

Key issues (Commercial Romford)

Retail

- 5.37 Romford's retail offer includes the popular and successful Liberty, Mall and Brewery centres. In addition, Romford also has extensive traditional outdoor shopping streets such as South Street, together with North Street, High Street and the historic Romford Market. It is the overall shopping environment, historic town centre setting and provision of services that separates and distinguishes Romford from Lakeside and Bluewater. Further retail redevelopment adjoining the Market Place as part of a major mixed-use scheme (including residential) will provide additional retail floorspace in the town centre.
- 5.38 Table 3 below presents the aggregate total of the number of units and floorspace by Use Class in Romford. The centre contains over 225,400 sqm of floorspace, of which 152,600 (68%) is in retail use. The centre supports a total of 453 retail units (as at February 2006).

³ London Borough of Havering Retail and Leisure Study, Roger Tym & Partners (April 2006)

Table 3: Diversity of uses in Romford

Use	Number of units	Gross floorspace (sqm)	Floorspace (%)
A1 Convenience	34	12,580	6
A1 Comparison	236	108,795	48
A1 Other	53	6,900	3
A2 Financial and Professional	52	7,890	3
A3 Restaurant and Cafés	48	8,610	4
A4 Drinking Establishments	16	7,050	3
A5 Hot Food Takeaway	14	840	0
Sui Generis	13	5,390	2
Vacant	49	28,060	12
Other	69	39,320	17
TOTAL RETAIL	453	152,665	68
TOTAL CENTRE	584	225,435	100

Source: Havering Retail and Leisure Study (2006)

Retail need

- 5.39 The Havering Retail and Leisure Study found that Romford currently performs well in its role as a Metropolitan Centre and is a prominent retail destination in east London. In the short term the study suggests:
- Consolidating Romford's role and ensuring that it retains its position in the regional retail hierarchy;
 - Implementing a strategy to reduce the number of overall vacancies within the town centre;
 - Developing some of the smaller vacant sites to provide additional high quality retail; and
 - Encouraging environmental improvements to improve the overall shopping experience in Romford.
- 5.40 In the medium to long term (up to 2018) it suggests that Romford will need to improve its retail offer in order to maintain its position in the hierarchy against other competing centres. For Romford to maintain its role as a Metropolitan Centre it can accommodate up to 30,000 sqm of new comparison floorspace by 2018.
- 5.41 With regard to convenience goods, the study identifies an additional need to 2018 of up to 1,400 sqm. This relatively small need is due in large part to Romford currently being well provided by supermarkets including Sainsbury's, Asda, Lidl and the food hall in the Marks and Spencer store. In addition, Aldi and Iceland are due to occupy space in the redeveloped North Side of the Market Place.

South Street

- 5.42 Following the arrival of the new shopping centres in Romford at the Liberty and The Mall (formerly Liberty 2) in the 1970s and 1980s, South Street experienced a decline in trade as traders preferred the larger format units and privately managed, secure trading environments within the Liberty and Mall centres. The Havering UDP encouraged A3 uses (food and drink)⁴ to locate to certain parts of South Street and this helped to create a new role for this area.
- 5.43 South Street remains an area of high footfall because of its location between the Brewery and the Liberty shopping centres and there is the opportunity for South Street to benefit from this. This is in addition to South Street being the key pedestrian route between Romford Station and the Market. As noted, the Havering Retail and Leisure Study indicates the capacity for additional floorspace and South Street could be promoted to capture some of this demand. The Council is aware that, at present, the format and size of many of the units along South Street are outdated and do not meet the needs of modern retailers. In order to realise this potential, a number of sites on South Street could be redeveloped to provide new, larger units that would be more attractive to modern retailers.

North Street

- 5.44 Within the Ring Road, North Street is a retail core location and pedestrianised street at present, which suffers from a lack of a clear identity and low levels of passing trade. The retail environment and streetscape is comparatively poor and despite being the main pedestrian route into the town centre from the north, footfall is low. However, there are a number of niche retailers including independent artist, clothing and music retailers. Additionally, planning permission has been secured for larger retail units at ground level in the new development scheme at 23-55 North Street and the adjacent Angel Way site (ROMSSA2) has the potential for some retail development. These developments will help increase footfall in North Street and help maintain and enhance its niche retail role. Therefore the Area Action Plan retains North Street's retail core designation to enable its niche retailing focus to be developed.

The Brewery

- 5.45 Wholesale redevelopment of the former Brewery site in the late 1990s has transformed this area into a modern and successful mixed-use centre which has helped to reinvigorate the town centre. The Brewery development started trading in 2001 and comprises a large supermarket (operated by Sainsbury's), a 16 screen multiplex cinema,

⁴ The old A3 use class order (food and drink) was separated into three new classes in April 2005. These are: A3 (Restaurants and Cafés), A4 (Drinking Establishments) and A5 (Hot Food Takeaway).

leisure units, a health and fitness club and a number of large retail units as well as over 100 new homes. A number of smaller retail units have also been developed along Brewery Walk. The Brewery also includes extensive car parking facilities, a petrol filling station and a bus station. The leisure elements of the scheme are very successful and the centre is well regarded by the large retailers. However, the Area Action Plan aims to make more effective and efficient use of the Brewery site and to ensure that it is better integrated into the rest of the town centre.

Offices

- 5.46 Romford is an important office location in east London, with a defined office quarter bounded by Western Road to the north, Mercury Gardens to the east, Chandlers Way to the west and the railway line to the south. The Romford Office Quarter has a number of vacancies due to recent closures. Local firms have reported difficulties recruiting and retaining high quality staff due a number of factors, including the lack of peak hour express trains to and from Liverpool Street and the quality of the local environment.
- 5.47 Despite this, the Havering Employment Land Review⁵ suggests that Romford has the potential to reverse this trend and consolidate its importance as a suburban satellite office centre. The study suggests that the local office market is likely to begin to experience an upturn and that demand for office space in Romford could be bolstered further by the proposed implementation of Crossrail. The study identifies an annual demand for land for offices of 0.7% or a total of 1.6 hectares by 2018. However, it also notes that only 5% of Romford's office space is new or refurbished.
- 5.48 Research by the GLA⁶ anticipates significantly more employment growth in Outer London over the next twenty years (11%) than occurred over the last 20 years (6%). Relative to inner London in proportional terms, more of this growth is expected to be office based. Office employment in Havering is predicted to rise 36.9% between 2006 and 2026 from 19,700 to 26,900. As a relatively high employment density activity it is important to accommodate this growth in sustainable locations, especially town centres. Therefore the Area Action Plan encourages more intensive development within the Romford Office Quarter to enable existing floorspace to be renewed.
- 5.49 The Area Action Plan aims to secure some A3 (restaurant and café) uses in the Romford Office Quarter to help diversify the uses and provide an attractive lunch and evening environment for workers and residents. This follows the lead of the recent development scheme at 10-14 Western Road which comprises new offices, 60 new apartments and café at ground floor level.

⁵ London Borough of Havering Employment Land Review, URS (April 2006)

⁶ Outer London: Issues for the London Plan, GLA (May 2007)

Liveable Romford

Overview

- 5.50 Romford town centre has developed in recent years as a primarily commercial environment, dominated by retail, office and leisure uses, with some industrial and residential uses to the south of the railway line. However, living in a town centre is becoming increasingly popular as people are seeking to integrate their working, social and home lives by choosing to live where there is easy access to facilities and public transport. Urban living is also being promoted by the Government to increase the sustainability and cohesiveness of our town and city centres. Recent residential developments in Romford town centre at The Brewery, The Axis and The Matrix have proved to be extremely successful and additional schemes are forthcoming on North Street and the Market Place as part of major new mixed use schemes.
- 5.51 The Area Action Plan focuses on the development opportunities within the town centre for new housing and the mix and tenure of new housing, including family accommodation. It also focuses on improving green space and biodiversity within the town centre, tall buildings, securing high quality design in all new development, and new public spaces.

Key issues (Liveable Romford)

Housing

- 5.52 Currently the most extensive area of housing in the town centre is located in the south eastern corner of the Ring Road and comprises mostly inter-war housing. However, residential development is increasing in the town centre and is increasingly spread throughout the centre rather than confined to the south eastern corner.
- 5.53 According to Public Transport Accessibility Levels (PTAL), Romford is the area most accessible to public transport in Havering. The Romford PTAL zone defines an 800 metre walking distance radiating out of Romford train station within which there is an opportunity to intensify housing significantly.
- 5.54 The revised London Plan housing target for Havering is 535 new homes per year from 2007/08 to 2016/17. The Housing Trajectory in Havering's Core Strategy identifies a significant amount of this new capacity coming forward in Romford town centre, with at least 700 units on the following sites:
- Angel Way (former Decathlon site)
 - Angel Way (former Secrets site)
 - Bridge Close
 - Como Street Car Park

- 23-55 North Street

However, this is a conservative estimate, as it is likely that these sites will yield over 1,000 units. In addition, there is potential for new housing through the intensification of development along Victoria Road and South Street, and in the Atlanta Boulevard and Regarth Avenue area which could yield another 500 units.

- 5.55 However, it is important that in order to create balanced and sustainable communities, the mix and tenure of housing provided in Romford town centre is addressed to ensure that the housing needs of all are met and supporting social infrastructure is provided. Currently, most of the new housing units being built in Romford town centre are one and two bed flats, with little family housing being provided. The Area Action Plan needs to consider how best to provide family accommodation, including houses, in a high density town centre setting and how to enable the provision of social infrastructure

Green space

- 5.56 In comparison to the verdant character of the rest of Havering, Romford town centre has very little green space and relatively few trees. The Havering Retail and Leisure Study and the Havering Open Space and Sports Assessment⁷ both note the lack of open space, trees and plants in Romford. The Retail and Leisure Study suggests that the town centre would benefit from 'greening', particularly in the summer months, encouraging visitors to sit down and relax for longer in the centre, and thus contribute to the overall levels of activity and vitality. In addition, providing more trees and plants will increase the town centre's biodiversity value and improve environmental quality. For example, the positive impact of tree planting along Eastern Road is striking. The churchyard of St Edward the Confessor in Market Place, Coronation Gardens on Main Road, and the grassed area to the east of the Liberty Car Park also offer green open space in the town centre.
- 5.57 The Area Action Plan provides a clear opportunity to enhance Romford's attractiveness as a place to live, as well as being an attractive retail, leisure and cultural destination, by enhancing the town's existing green spaces, creating new spaces and maximising links to the parks outside the town centre. Whilst green space in Romford town centre is limited there are large parks within convenient walking distance, with Cottons Park to the west and Lodge Farm and Raphael Parks to the east (see Figure 1). For this reason, the Havering Open Space and Sports Assessment shows that there are only two areas of deficiency to public parks within the Action Plan area. The first is north of the Market Place, across the site of the car park and hotel. The second extends from Romford Station across to the Ring Road and then east across Bridge Close and the Ice Rink site. This

⁷ Havering Open Space and Sports Assessment, Atkins (October 2005)

deficiency will be remedied by the provision of a new public park as part of the redevelopment of the Oldchurch Hospital. Tree planting is also an integral part of the 'Greening the Ring Road' project, which is one of the Mayor of London's 100 Public Spaces Programme.

[Fig. 1: Revised version of map on p.22 of Romford IPG to be included]

Urban Design

- 5.58 It is important that all new development in Romford town centre is of the highest quality in terms of architecture and urban design if it is to compete with nearby town centres and out of town shopping centres and attract the right sort of investment. A high quality town centre helps foster civic pride and instil a sense confidence amongst the community and investors. The Romford Urban Strategy placed particular emphasis on high quality architecture and urban design in Romford town centre. Similarly, the Core Strategy sets out Havering's commitment to high quality urban design. As such, the Area Action Plan will ensure that all new development contributes positively to the town centre in terms of how it looks and functions.

Public Realm

- 5.59 One of the consequences of recent development in Romford has been the blurring of distinction between public and private space. The Liberty, Mall and Brewery centres are private spaces. It is only when these are closed to the public outside of shopping hours that the quality and extent of Romford's public realm of the town centre reveals itself. The pedestrianisation of South Street (north from the junction with Western Road) and North Street (to the Ring Road) has improved the public realm but there is a lack of public civic spaces in the town centre. The Area Action Plan seeks to use the opportunities that exist within the Romford Office Quarter, the Romford Station area, Bridge Close and the Angel Way site to create new public spaces. In addition, as previously outlined, the Market Place presents the opportunity for the development of a new town centre public square and event space. This would reinforce the Market as well as enhance the town centre environment and provide an attractive outlook for the extensive residential development on the north side of the Market Place.

6 The planning of Romford town centre up to 2020: Romford Area Action Plan Vision

Havering Strategic Partnership

- 6.1 In 2005, Havering Strategic Partnership updated the Havering Community Strategy after wide consultation with the community.

The Vision for Havering in the 2005 Community Strategy is:

- To create a safe, welcoming, healthier and more prosperous place where people choose to live, work and visit.

- 6.2 To realise the vision, the Partnership has adopted this mission:

- Make Havering an inclusive place in which to live, work and visit;
- Create a dynamic, prosperous economy driven by a well-educated and trained workforce;
- Create a thriving, successful and healthy community for all;
- Create a good quality of life in Havering for now and the future, through actions that contribute locally, nationally and internationally to sustainable development.

- 6.3 This will be delivered through a Community Strategy with six themes:

- A More Prosperous Community
- Improved Lifelong Learning
- Better Health and Welfare
- Increased Community Participation
- Protect and Improve the Environment
- A Safer Community

- 6.4 Achieving the vision will involve securing and managing positive changes in the towns, suburbs, and countryside areas which make Havering the place that it is. Therefore the aim of Havering's Local Development Framework, is to protect and strengthen what is best about Havering, to create places of real quality which are enjoyable and fulfilling to live in, and to improve social, economic, and environmental opportunities for the whole community. The Romford Area Action Plan, together with other Council strategies, will play a key role in achieving this.

- 6.5 Table 4 shows how the Vision themes relate to the Romford Area Action Plan strategic objectives. The Vision is focussed on delivering the Community Strategy themes and is also a product of an analysis of

the policy context and evidence base as explained in Section 4 of this document.

Table 4: Community Strategy themes and Romford Area Action Plan objectives

		Community strategy themes					
		A more prosperous community	Improved life long learning	Better health and welfare	Increased community participation	Protect and improve the environment	A safer community
AAP Objectives	Connecting Romford	✓		✓		✓	✓
	Cultural Destination Romford	✓			✓	✓	✓
	Commercial Romford	✓	✓		✓		✓
	Liveable Romford	✓	✓	✓		✓	✓

Romford Area Action Plan Vision

6.6 The vision for Romford town centre has been developed drawing on the extensive consultation undertaken on the Romford Urban Strategy and updated taking into account the review of plans, policies and programmes for the preparation of the Scoping Report and responses received to the Issues and Options and Preferred Options Reports. This vision for Romford 2020 is:

- Romford Town Centre, with the help of Romford Town Centre Partnership, will expand its retail offer to ensure its continued position as East London’s premier town centre. Romford town centre will continue to provide a high quality retail experience and offer a diverse range of activities for all groups, thriving on the competition offered by Stratford to the west and Lakeside and Bluewater to the east.
- Romford will be a centre where only high quality design-led development is allowed and which positively contributes to the character of Havering overall. Romford’s cultural and built heritage will be maintained and enhanced and will continue to be an important element of Romford’s attractiveness as a commercial, cultural and residential town centre.
- Romford’s existing green spaces will be protected and enhanced and opportunities to create new green spaces and ensure a richer biodiversity in the town centre will have been progressed.
- Romford will be valued as a cultural destination featuring a hub of new cultural facilities and drawing on its existing strengths as

a historic market town. It will have a safe, diverse and culturally rich evening economy offering a range of activities for people of all ages.

- Romford's historic Market will strengthen its role as a central feature of Romford's identity and a key part of the local economy and the Market Place will be a high quality prominent space in the town centre.
- Romford Office Quarter will be an area of new investment for businesses. It will offer a range of employment opportunities in a vibrant, attractive and mixed-use environment, creating an area where people choose to work and businesses want to relocate to.
- Romford town centre will be a place where people want to live. The town centre will be a place of high quality residential living that provides easy access to Romford's numerous facilities and high public transport accessibility.
- Provision will continue to be made for cars in recognition that many people will continue to use them for travel but overall traffic growth will be falling and many more people will choose to walk and cycle.
- Overall Romford town centre will be a diverse, attractive, safe and accessible town centre which caters for all types of people including workers, shoppers, visitors and residents alike.

7 Strategic objectives for the planning of Romford town centre up to 2020

- 7.1 The objectives for the Area Action Plan are derived predominantly from the Romford Urban Strategy. They have been further reviewed and updated, where appropriate, to take into account the responses to the Scoping, Issues and Options, and Preferred Options Reports. For consistency, the objectives are presented under the four key themes of the Romford Urban Strategy.

Connecting Romford

- (A) Enhance access to Romford and improve connectivity within the town centre by improving the public transport network, reducing car congestion, addressing future parking shortages, improving interchange facilities and improving conditions for cyclists and pedestrians.

Cultural Destination Romford

- (B) Promote Romford as a cultural destination for all by focusing on strengthening and diversifying Romford's Market, managing and diversifying the evening economy, developing a new cultural quarter and respecting and enhancing Romford's heritage.

Commercial Romford

- (C) Create a vital and viable town centre that provides for the diverse needs of all of the local community.
- (D) Support and enhance Romford's strength as a commercial centre by creating conditions which are favourable to attracting higher quality retailers, seeking the regeneration of North Street, South Street, High Street and the Romford Office Quarter and enhancing the image of Romford as a major retail and employment location.

Liveable Romford

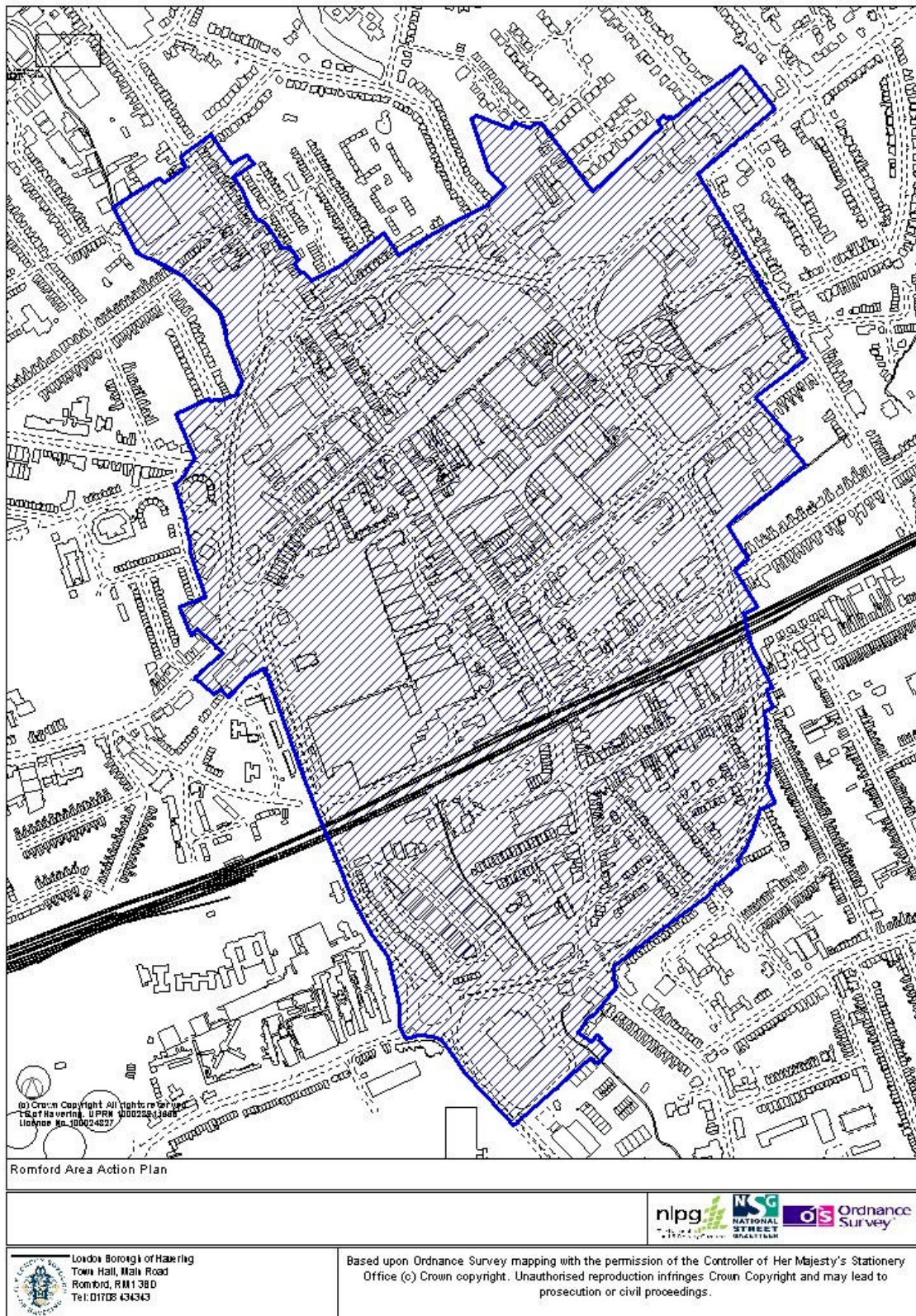
- (E) To maximise the provision of high quality housing of all tenures in the town centre.
- (F) Encourage more residents to live in Romford by ensuring the centre provides the necessary facilities and services that are required for balanced and sustainable communities including leisure facilities, comparison and convenience retailing and community services.

- (G) Enhance the town centres existing green spaces and biodiversity value and promote the development of new, high quality open spaces in the town centre to make Romford town centre a better place to live.
- (H) Promote high quality design-led development that improves the attractiveness of the town centre and creates a safe environment for all.

8 Key Diagrams

[Fig. 2: Diagram showing Romford's position in the sub-region – to be included]

Figure 3: Boundary of Romford Area Action Plan



9 Policies

- 9.1 These planning policies provide detailed guidance on the criteria against which planning applications will be determined. All applications for planning permission within Romford town centre must satisfy the relevant policies in the Core Strategy and Development Control Policies DPD, the Romford Area Action Plan and Supplementary Planning Documents. Where necessary, the Area Action Plan policies include information on how they will be implemented.
- 9.2 The policies are the product of the Sustainability Appraisal process and take account of the feedback received from the community and other stakeholders during the various consultation initiatives undertaken in preparing, firstly, the Romford Urban Strategy, and then the issues and options, preferred options and submission stages of the Romford Area Action Plan. The Romford Area Action Plan Sustainability Appraisal Report and Statement of Compliance should be consulted for more information on this.

CONNECTING ROMFORD

[Photo to be inserted]

ROM1 – ROMFORD STATION GATEWAY

To ensure that Romford Station and the adjoining area is redeveloped as a major transport interchange in a high quality urban setting that will provide an outstanding access gateway for Romford, new development must:

- **Deliver a significant improvement in the townscape and pedestrian environment through to the south of the station;**
- **Incorporate better integrated facilities between different transport modes, including increased bus stand capacity;**
- **Be anchored by a landmark tall building; and**
- **Ensure safe, convenient and attractive direct pedestrian and cyclist access to the station from Victoria Road, South Street and Atlanta Boulevard.**

REASONED JUSTIFICATION

- 1.1 The Council is committed to transforming the environment in and around Romford Station. Romford Station is a major gateway into the town centre and for journeys into London and Essex and should present a positive and attractive image for people arriving and departing. The station and the surrounding area largely retain their original format and layout. This is unsuited to the level of use that the station currently enjoys and it taints the impression that visitors and residents have of Romford. The station and its surroundings do not fit with Romford's role or status and do not compare favourably with the quality of other parts of the town centre which have benefited from significant investment and townscape improvements.
- 1.2 The main pedestrian entrance/exit to and from the station is from South Street beneath the railway line. This is of restricted width and congested at peak times. The majority of passengers access the station from the south as this is where the bus services are located. However, this area has a low environmental quality. In particular, the pedestrian environment is very poor and there is a narrow pavement forecourt in front of the station. The pedestrian environment north of the station is better due to recent environmental improvements (see also ROM4).
- 1.3 Environmental improvements to the exterior of the station have helped improve its appearance and security. However, there is now a clear opportunity through this policy to achieve more fundamental changes through:
 - The provision of the Crossrail scheme which will bring significant improvements to the station access and lengthened platforms for Crossrail trains
 - The opportunity for Network Rail to redevelop their site immediately to the south of the station

- Commitment from Transport for London to improving bus services in the South Street area and the proposed East London Transit which is due to run along South Street
- The delivery of ROMSSA6 Romford Station Interchange and Gateway

ROM2 – EAST LONDON TRANSIT

The Council will support Transport for London in implementing the East London Transit scheme and supports its routing along South Street, North Street and around the Ring Road to Main Road, with interchanges at Central Library and the Romford Station Gateway.

REASONED JUSTIFICATION

- 1.1 The first phase of the East London Transit scheme will connect Ilford to Dagenham Dock via Barking town centre and is due to be operational in autumn 2009. Later phases could extend through to Rainham, Elm Park and Romford, with separate routes to Collier Row and Harold Hill. On opening, the scheme will be bus based and involve high levels of priority and segregation where this is feasible.
- 1.2 Any extension of East London Transit to Romford (and beyond to Collier Row and Harold Hill) is not expected to be implemented before 2015. Nevertheless, because this is still within the timeframe of the Area Action Plan it needs to consider how the East London Transit can best be integrated into the future planning of the town centre.

ROM3 – BREWERY BUS PROVISION

Any redevelopment of the Brewery scheme should provide for a more convenient and usable bus facility in terms of location and choice of services.

REASONED JUSTIFICATION

- 1.1 A bus station was provided as part of the Brewery scheme to help ensure people had a choice of transport modes to access the site and the wider town centre. At present, only one bus route uses the Brewery Bus Station – the 165 from Abbey Wood Lane (Rainham) which terminates there. Consequently, there is limited use of the bus station. At the same time, a number of frequent bus services run along Waterloo Road to and from the Queen's Hospital.
- 1.2 Redevelopment of all, or part of, the Brewery site presents the opportunity to increase the number of routes that serve the Brewery and to provide a bus facility in a more accessible and convenient location. The Council will work in conjunction with the Brewery owners, Henderson Global Investors Limited, and Transport for London to achieve this policy.

ROM4 – PEDESTRIAN LINKS

Improvements to the pedestrian environment within the town centre, and links into and through Romford town centre, will be achieved by:

- **Developer contributions for pedestrian improvements;**
- **Seeking improvements to the design and lighting of subways under the Ring Road;**
- **Undertaking a feasibility study into replacing the North Street roundabout at the junction with the Ring Road with a signalled junction and surface level pedestrian crossing;**
- **Undertaking a feasibility study into introducing pedestrian crossings at a number of locations around the Ring Road;**
- **New pedestrian signage;**
- **Improvements to the pedestrian environment at Arcade Place, and between South Street and Waterloo Road through redevelopment opportunities in these areas; and**
- **The creation of a riverside pedestrian route.**

REASONED JUSTIFICATION

- 1.1 Promoting sustainable travel, including walking, will help reduce reliance on car use and helps to encourage healthy and active lifestyles. Promoting walking and improving the pedestrian environment are key commitments in Havering's Cycling Strategy (June 2006) and approved Local Implementation Plan (LIP).
- 1.2 Improving the pedestrian environment in Romford town centre, including routes and crossings, will encourage more people to walk. Increasing numbers of pedestrians leads to greater levels of street activity and can increase town centre safety. Within the town centre, parts of South Street and North Street are traffic-free and the Liberty, Mall and Brewery centres also offer indoor pedestrianised shopping environments. However, for some people walking to the town centre the Romford Ring Road can act as a barrier due to the design of the subways and the lack of surface level crossings.
- 1.3 The pedestrian subway at Market Place is an example of good practice: it is frequently used and there is a green open space with seating in the centre which feels safe and pleasant. Apart from this subway, the pedestrian subways under the Ring Road are under-used and can feel unsafe. Following the example of the refurbishment of the Market Place subway, the Council will seek improvements to other pedestrian subways to enhance access to the town centre.
- 1.4 The Romford Ring Road is a third phase project in the Mayor of London's 100 Public Spaces programme. The Council has secured funding for a Romford Ring Road study and will bid for further funding from Transport for London to implement the outcomes of this work, including accessing the feasibility of, and the best locations for, surface

level crossings on the Ring Road. In particular, it will also assess the feasibility of replacing the North Street roundabout with a signal controlled junction. This would enable the subway to be replaced with a surface level crossing and better integrate North Street inside and outside the Ring Road.

- 1.5 The incremental development of the town centre, including three large shopping centres, has led to a pedestrian environment which would be enhanced by being more legible. The Regeneration Capital Programme is funding the first phase of the Romford Town Centre Pedestrian Signage Project. This signage will help reinforce a sense of identity in Romford, improve legibility and peoples ability to navigate through the area, as well as making a positive contribution to the public realm. Further sources of funding from town centre partners and Transport for London are being explored for further contributions to the project.
- 1.6 The Council has also identified Arcade Place, and the links between Waterloo Road and South Street, as being in need of improvements to the pedestrian environment.
- 1.7 Arcade Place is a popular route from the Brewery car park into the town centre with high levels of pedestrian footfall. The Brewery car park has 1,600 spaces and is the largest and most popular car park in Romford. The route along Arcade Place into the town centre forms an initial impression of Romford for many customers and is, therefore, an important pedestrian link that requires particular attention. At present, the route suffers from a lack of commercial activity facing the street and the service route that bisects it dominates the pedestrian experience. To address this, the Council will seek the redevelopment of the corner sites on the eastern side of the junction with Exchange Street and other sites on Arcade Place.
- 1.8 South Street to Waterloo Road is a pedestrian link that runs along the north side of the railway line and is reported by the police to be a crime hotspot. The pedestrian route (known as 'the Battis') is dark and feels unsafe. Through the proposed redevelopment of the area to the south of Romford station (ROMSSA6), there is an opportunity to create a safer, more well-defined route which would link to Waterloo Road. In the longer-term there may also be an opportunity to improve pedestrian links east-west if proposals for the redevelopment of the Brewery site are forthcoming.
- 1.9 Redevelopment of the Bridge Close site (ROMSSA2) also offers the opportunity to develop a new riverside walkway and footbridge. In addition to enhancing the recreational potential of the river, this would improve pedestrian links from this site, and from the new housing development on the former Oldchurch Hospital site, into Romford town centre.

ROM5 – CYCLE ROUTES

Improvements to the cycling environment within the town centre, and links into and through Romford town centre, will be achieved by:

- **the creation of new dedicated cycle routes around the Romford Ring Road**
- **investigating opportunities through undertaking feasibility studies, including route investigation, to create more dedicated routes through Romford town centre**

The Council will primarily implement these measures through Transport for London funding and developers' contributions.

REASONED JUSTIFICATION

- 1.1 Promoting sustainable travel, including cycling, will help reduce reliance on car use and helps to encourage healthy and active lifestyles. Promoting cycling, and improving and increasing cycle routes, are key commitments in Havering's Cycling Strategy (June 2006) and approved Local Implementation Plan (LIP).
- 1.2 Within Romford town centre there are currently cycle routes along Eastern Road, Exchange Street, High Street and Angel Way, and around parts of the Ring Road. Recent improvements to the cycle network include the provision of dedicated cycle crossing points over the Ring Road from Eastern Road.
- 1.3 Reallocating road space for well designed cycle routes has positive effects upon safety and comfort for cyclists. In order to encourage cycling and to promote sustainable travel, the Council will seek to create new cycle routes in and around Romford town centre through a range of schemes and funding programmes.
- 1.4 The Council submits bids to Transport for London (TfL) on an annual basis for funding into feasibility studies for cycle routes, upgrading of existing facilities and the design and implementation of cycle facilities at key locations across the borough. The Council will continue to seek funding from TfL for feasibility studies into upgrading existing cycle routes and developing new cycle routes on an annual basis through the LIP Annual Reporting and Funding Submission.
- 1.5 The Council has submitted bids to TfL through the LIP for Cycle Route Implementation and Stakeholders Programme (CRISP) schemes for the 2008/9 financial year. Schemes in Romford are:
 - Link 90: Eastern Road/South Street junction and South Street (Havana Close to Eastern Road)
 - Link 91: Thurloe Gardens/George Street junction

- Link 92: Study to investigate alternative routes and identify improvements to the existing route.
- 1.6 Where appropriate, the Council will seek funding from external sources, including developers, to fund or partially fund the feasibility, design and implementation of cycle routes in and around Romford town centre. This includes taking forward work on developing a cycle route around the Romford Ring Road through the Mayor's 100 Public Spaces.

CULTURAL DESTINATION ROMFORD

[Photo to be inserted]

ROM6 – RESPECTING THE HISTORIC ENVIRONMENT

In addition to the requirements of Core Strategy and Development Control Policies, the built heritage of Romford will be protected, enhanced and promoted by:

- **Implementing the outcome of the Romford Conservation Area Appraisal through the Heritage SPD. In the meantime, the existing boundary of the Conservation Area will be retained; and**
- **Requiring developers to assess the regeneration potential of other buildings of historical and/or architectural interest in their scheme**

REASONED JUSTIFICATION

- 1.1 Romford Conservation Area was one of the first conservation areas in the borough to be designated [in April 1968] and there have been no changes to the boundary. The Council has appointed consultants to undertake a character appraisal of the Romford Conservation Area and to make recommendations for the future of the area. The Council will act on the results of this to determine the boundary of the Conservation Area. In the meantime, the current boundary will be maintained. The Heritage SPD will build on the work of the Conservation Area Appraisals and the Heritage Strategy for Romford and Hornchurch (2000) and set the criteria for designating Conservation Areas.
- 1.2 There are six listed buildings within the Area Action Plan Area, four of these are within the conservation area. The Development Control Policy for listed buildings (DC67: Buildings of Heritage Interest) is within the Development Control Policies DPD.

Listed buildings within the Conservation Area:

- Parish Church of St Edward the Confessor, Grade II* listed
- The Lamb Public House, Grade II listed
- Church House, Market Place Grade II listed
- The Golden Lion Public House, Grade II listed

In addition, the following listed buildings are within the Romford Area Action Plan boundary:

- Havering Town Hall, Grade II listed
- 96-102 North Street, Grade II listed

The Heritage Strategy for Romford and Hornchurch (2000) identifies the following Buildings of Local Heritage Interest within the Romford Area Action Plan boundary:

- [Premises formerly] The Woolpack, High Street
- Prudential Building, High Street
- Romford Brewery buildings, High Street

- [Formerly] The White Hart, High Street [now The Bitter End]
- Kingsmead Mansions, Kingsmead Road
- Romford Baptist Church, Main Road
- 28 Market Place
- The Bull, Market Place
- Lloyds Bank, North Street
- St Edward's Catholic Church, Hall & Presbytery, Park End Road
- 95 South Street
- 97 South Street
- 99-103 South Street
- 105-111 South Street
- Odeon Cinema, South Street
- 110 South Street
- 112-116 South Street
- 131 South Street
- Co-op Bank, South Street
- Page Calnan Building, South Street
- Quadrant Arcade, South Street/Market Place
- Romford Station, South Street
- Old Mill Parade, Victoria Road
- Station Parade, Victoria Road

- 1.2 The Council will require developers to take into account the regeneration potential of these buildings of historical and/or architectural interest in their scheme including the potential, where appropriate, for their re-use.
- 1.3 Applications for development should also refer to the specific urban design criteria in ROM20.
- 1.4 In line with Development Control Policy DC70 (Archaeology and Ancient Monuments) developers should take into account the archaeological significance of sites and take appropriate measures to safeguard that interest.

ROM7 – MARKET PLACE

Through the implementation of the Market Strategy Forum Action Plan, the layout, appearance and function of Romford Market will be improved and a new public square will be created outside Tollgate House at the eastern end of the Market Place as an event space and focal point for Romford town centre.

Any new development with a frontage to the Market Place will be required to respect the scale and massing of existing buildings in the Market Place to reinforce the sense of enclosure and emphasise its civic importance.

REASONED JUSTIFICATION

- 1.1 The Council has approved the establishment of a Market Strategy Forum to oversee the implementation of the Romford Market Strategy. The Forum will be chaired by the Cabinet Member for Housing and Regeneration, with representatives from the traders, Romford Town Centre Partnership, and relevant Council services. The Forum would produce an Action Plan, assigning responsibilities and timescales for achieving the various elements of the strategy, which places the Market at the heart of Romford's future.
- 1.2 The Council owns the Market Place and will seek to create a new public square outside Tollgate House which will be permanently available for the public to enjoy on both market and non-market days, and which will be used for cultural activities and events. This would see the Market Place as a focus for activities involving children and young people, and the community at large, in the arts, entertainment and environment, and could include, for example, major seasonal events, summer schemes for children, theatre and poetry workshops, bands and music roadshows and the inclusion of the historic buildings such as the Parish Church of St Edward the Confessor in London Open House. An Action Plan to take forward the cultural opportunities provided by this new, large public space will be drawn up by Cultural and Leisure Services in conjunction with Town Centre Management. This in line with the Havering Cultural Strategy 2007-2011 which identifies developing the Market Place as a key opportunity for culture in Romford.
- 1.3 The layout of the weekday retail market will be revised to achieve the objective of creating the new public square outside Tollgate House. The proposed revision of the layout of stalls and pedestrian access, together with the creation of a 7-days-a-week activity and event space, should significantly improve the attraction of the weekday market to shoppers and visitors.

ROM8 – DAY AND EVENING ECONOMY

The daytime and evening economy of Romford will be diversified by:

- **Seeking to reduce the concentration of licensed premises in South Street and counting restaurants as A1 uses for the purpose of retail core policy;**
- **Working with developers and operators to secure more restaurants in the town centre;**
- **Controlling the impacts of food, drink and evening entertainment facilities by the implementation of Policy DC23;**
- **Controlling the noise or vibrations from developments by the implementation of Policy DC55; and**
- **Working with landowners to investigate alternative uses for existing pubs and nightclubs**

REASONED JUSTIFICATION

- 1.1 Romford has a vibrant day and night time economy, but there is a need to diversify this so that the town centre, particularly at night, is more attractive to all groups. Therefore this policy aims to reduce the concentration of pubs and bars in South Street through the application of ROM10 which counts A3 uses as A1. The Council will also continue to work with breweries, pub landlords and nightclub operators to investigate alternative uses for existing pubs and nightclubs. Three nightclubs have recently closed and are in the process of being redeveloped for residential. The Council will work with developers and operators to encourage them to secure restaurants and cafés in preference to further pubs and bars in any redevelopment schemes. For example, the Atrium scheme in the Brewery will provide six new restaurants and four new cafés.
- 1.2 The Council will seek to ensure that the food, drink and evening entertainment uses do not adverse effect the amenity of town centre residents through the application of Development Control Policies DC23 (Food Drink and the Evening Economy) and DC55 (Noise) and the implementation of the following strategies:
- Havering Community Safety Partnership - Havering Crime, Disorder & Drugs Reduction Strategy 2005-2008
 - London Borough of Havering - Alcohol Harm Reduction Strategy 2008-2011
 - London Borough of Havering - Ambient Noise Strategy (when adopted)
 - London Borough of Havering - Statement of Licensing Policy
 - Mayor's Best Practice Guidance on 'Managing the Night Time Economy'.

COMMERCIAL ROMFORD

[Photo to be inserted]

ROM9 – ROMFORD: METROPOLITAN SHOPPING CENTRE

Romford's status as a metropolitan centre and sub-regional shopping centre will be promoted and enhanced by:

- **The development of up to 30,000 sqm of new retail floorspace for comparison goods by 2018 (see ROMSSA1 and ROMSSA3);**
- **Limited growth in convenience goods shopping floorspace; and**
- **Keeping under review the need and capacity for additional retail facilities.**

REASONED JUSTIFICATION

- 1.1 The Havering Retail and Leisure Study (2006) found that Romford currently performs well in its role as a Metropolitan Centre and has thrived on the competition from Lakeside and Bluewater. In the medium-to-long term, Romford will need to continue to improve its retail offer in order to maintain its position in the regional retail hierarchy. The capacity assessment suggests that in order to maintain its role as a Metropolitan Centre within London, Romford town centre can accommodate up to 30,000 sqm of new comparison floorspace and up to 1,400 sqm of new convenience floorspace by 2018.
- 1.2 New retail floorspace will be provided through:

Existing planning permissions

- Ground floor retail development on the North Side of the Market Place
- Ground floor retail development at 23-55 North Street

Site Specific Allocations

- ROMSSA1: Angel Way
- ROMSSA3: Como Street

Intensification of existing shopping centres

- The Brewery
- The Liberty
- The Mall
- South Street Core Retail Area

ROM10 – RETAIL CORE

In the retail core of Romford town centre, planning permission for A1 retail uses will be granted at ground floor level.

Service uses (A2, A3, A4, A5) will be permitted within the retail core only where the following criteria are met:

- **The use provides a service appropriate to a shopping area;**
- **The proposal will not result in a group of three or more adjoining A2-A5 uses;**
- **Not more than 15% of the length of the relevant frontage will be in non-retail use following implementation of the proposal.**

Opportunities for the provision of new and larger retail units in South Street through the consolidation of existing sites will be encouraged.

To reduce the concentration of pubs and bars in South Street, and to encourage more restaurants in the town centre, in the frontages of numbers 72-116 and 87-131, A3 uses will be counted as A1 uses.

Niche retailing will be encouraged in the retail core of North Street, 8-54 North Street and 23-55 North Street.

REASONED JUSTIFICATION

- 1.1 Romford's Primary Shopping Area comprises the retail core and retail fringe. The extent of the retail core is defined on the Proposals Map and comprises the primary shopping frontages. In this area, the policy seeks to restrict the number of non-retail uses (A2-A5) and to prevent their grouping in order to ensure the continuity of individual shopping frontages and the necessary concentration of prime retailing which comprises the retail core. Within the retail core, any non-retail uses must have an active frontage.
- 1.2 The Liberty, The Mall and The Brewery are three successful retail centres which have been key to Romford maintaining and enhancing its status as East London's premier shopping centre, and comprise the majority of the retail core floorspace. There are, however, important primary retail shopping frontages outside these centres along South Street, North Street and High Street and this policy aims to ensure that the vitality and viability of these are promoted and enhanced.
- 1.3 South Street enjoys a strategic location between the Liberty and the Brewery centres. The Council is aware that a number of retailers are looking to locate in Romford but the lack of suitable premises is an issue' particularly along South Street where the retail units tend to be small and poorly suited to modern needs. Therefore the Council will encourage the consolidation of sites along South Street to create larger retail units.
- 1.4 There is currently a concentration of pubs and bars in the frontages of South Street numbers 72-116 and 87-131 due to the promotion of previous Council policy. The Council now wishes to reduce the concentration of pubs and bars in this area and secure a better mix of

retail and non-retail uses. To enable this, the Council will consider restaurants and cafés (A3) as A1 uses to encourage existing drinking establishments (A4) to change use.

- 1.5 There are a number of specialist shops along North Street (within the Ring Road) including musical instrument, photography, picture framing and artist materials shops. The Council will continue to encourage further niche retailing in this area.
- 1.6 In dealing with multi-level schemes such as The Mall, the Council will interpret ground floor as meaning any level at which the public currently shops. Within the Brewery scheme the retail core areas apply to the ground floor only.

ROM11 – RETAIL FRINGE

Retail uses (Use Class A1) will be permitted throughout the retail fringe (secondary shopping area). Planning permission for non-retail uses (Use Classes A2-A5) will be granted at ground floor level provided that the use:

- **Complements the retail function;**
- **Has an active frontage;**
- **Is open during core retailing hours;**
- **Does not significantly harm the character, function and vitality and viability of the centre.**

REASONED JUSTIFICATION

- 1.1 In line with PPS6, the fringe retail areas are more flexible with regard to non-retail uses. This has a number of benefits:
 - Reducing pressure for non-retail uses in the core retail area;
 - Helping to facilitate linked trips; and
 - Providing a greater diversity of uses in the town centre.

However, it is important that these uses compliment and consolidate the town centre's retail function and the criteria within the policy aim to ensure this.

- 1.2 The extent of the fringe retail area is shown on the Proposals Maps and includes the following secondary frontages:
 - 18-46 High Street
 - 25-59 High Street
 - 68-78, 88-106, 116-148 and 95-105 North Street
 - 147-183 South Street
 - Station Chambers, Victoria Road
 - Old Mill Parade, Victoria Road

- 1-13 Victoria Road
- Station Parade, Victoria Road
- 14-64 Victoria Road

- 1.3 High Street occupies an important location in the town centre, in close proximity to the Brewery and the Market. However, High Street has suffered from a loss of trade and activity in recent years which traders consider is partly as a result of the pedestrianisation of South Street. Before the Brewery was redeveloped, the High Street was the main entrance for cars and pedestrians from the west of Romford town centre. The redevelopment of the Brewery opened up the Waterloo Road frontage and enabled the implementation of a surface level crossing into the Brewery which reduced pedestrian activity along High Street. Consequently, as the Havering Retail and Leisure Study confirmed, High Street has one of the lowest pedestrian flows in the town centre. The study also noted that, according to commercial property agents, High Street was considered to be a secondary retail location with lower demand for space and lower retail rents. Therefore, this policy re-designates numbers 18-46 High Street from retail core to retail fringe (in line with the current designation for 25-59 High Street) to enable a wider range of uses to locate there and compliment the planned Romford Museum on the opposite side of High Street.
- 1.4 North Street is the main pedestrian link from the north of the town centre but has low footfall. This is due, in part, to the poor quality environment of North Street on either side of the Ring Road and of the subway under the North Street roundabout. To address this the Council intends to undertake a feasibility study into replacing the North Street roundabout with a signal controlled junction (see also ROM4). This is being undertaken using funding secured from Transport for London and S106 agreements to carry out a wider review of the Ring Road and associated traffic and environmental issues. The retail frontage on either side of North Street outside of the Ring Road is currently designated as two separate local centres due to their physical and functional separation from Romford town centre. Replacing the roundabout with a junction would enable the retail frontage on either side of the Ring Road to be better integrated with the rest of the town centre. In particular, it will enable the retail frontage on the western side of North Street to be extended south. It would also enable the Como Street site to incorporate increased land take in this area and enhance the development opportunity at this site. Finally, it would enable a surface level crossing to replace the subway to provide a more attractive linkage to and from the town centre. Opportunities will be investigated through any redevelopment to bring about environmental improvements to this part of North Street.
- 1.5 South Street (south of the railway line) and Victoria Road are currently designated as retail fringe and contain a number of smaller retail units. The Havering Retail and Leisure Study notes that, along with North Street and High Street, Victoria Road has lower demand for space and

achieves lower retail rental rates, while footfall is amongst the lowest in the town centre. However, the Council proposes retaining both of these sites within the retail fringe and any future redevelopment in South Street and Victoria Road will offer the opportunity to improve both the retail environment and streetscape of this part of the town centre.

ROM12 – THE BREWERY

Any redevelopment of the Brewery site must:

- **In line with ROM9, meet some of the demand for new retail development;**
- **Consider opportunities for the expansion of leisure floorspace;**
- **Maximise opportunities for new housing development within the scheme (see ROM14);**
- **Review car parking provision to encourage a more efficient use of the site;**
- **Address the need for enhanced integration of the scheme with the town centre;**
- **In line with ROM20, present a built frontage to the Ring Road (Waterloo Road);**
- **Create direct linkages to the railway station (see ROM1);**
- **Provide for a more convenient bus facility in terms of location and choice of services (see ROM3);**
- **Provide a more positive use of circulation space in and around the scheme; and**
- **Reflect Romford's traditional street pattern and building/street relationship.**

REASONED JUSTIFICATION

- 1.1 Wholesale redevelopment of the Brewery site in the late 1990s transformed this area into a modern and successful mixed-use centre which was a catalyst for wider town centre investment and which has helped reinvigorate the town centre. However, compared to more recent developments in the town centre, the Brewery site is comparatively low density and features extensive surface car parking. This presents the opportunity for either intensification of the site or for any redevelopment to make better use of the site. Either way this opportunity would also enable a number of issues, as set out in the policy, to be addressed to build on its current success. It will also enable more housing and retail floorspace to be provided as well as expanding on the current leisure offer.
- 1.2 Reviewing the car parking provision at the Brewery may enable the existing capacity to be retained and allow opportunities to bring new retail and leisure development into the scheme. In line with ROM14, opportunities for new residential development within the Brewery as part of any redevelopment should be considered. Any new

development situated on the eastern side of the site should present a built frontage and active uses onto the Ring Road.

- 1.3 Any redevelopment proposals should consider the relationship between the Brewery and the rest of the town centre and how greater integration between the two can be achieved, particularly through Arcade Place to South Street and to and from Romford railway station. Redevelopment of the south side of High Street (see ROMSSA5) may also present the opportunity to integrate this site into the Brewery and any proposals for redevelopment should consider how this could be taken forward.
- 1.4 Any redevelopment proposals should consider a more positive use of circulation space in and around the scheme. This could include the relocation of the existing bus facility elsewhere within the site in line with ROM3.

ROM13 – ROMFORD OFFICE QUARTER

Proposals to increase the office accommodation in the Romford Office Quarter will be encouraged. To increase the vitality and viability of the Romford Office Quarter higher densities will be allowed and residential and A3 uses encouraged provided that:

- **There is no net loss of office space in any redevelopment of existing sites;**
- **New developments include a significant element of new office space within the scheme; and**
- **In line with ROM17 and ROM21, new developments incorporate tree planting and green amenity space, and new hard landscaped public spaces.**

REASONED JUSTIFICATION

- 1.1 Romford is an important outer London office centre, with the majority of office space concentrated in the Romford Office Quarter in the Western Road and Eastern Road area. As noted in section 5, the lack of peak hour express train services to and from London is a concern to employers. However, the future development of Crossrail is strongly supported by the Council and will improve access into and across central and west London. The impact of the scheme could bolster Romford's position as an office location.
- 1.2 However, the stock within the Office Quarter is becoming dated and may not meet the needs of current and future potential occupiers. To replenish the existing stock and help meet the forecast need for new office space, this policy allows for more intensive development. Office blocks in the Romford Office Quarter are uniformly four storey. This policy will allow the development of six and eight storeys to significantly

increase the development potential of sites and enable mixed-use development and the modernisation of office floorspace.

- 1.3 There are also issues about the quality of the surrounding environment. To address the concerns of employers regarding the attractiveness and utility of the Romford Office Quarter this policy, in conjunction with ROM17 and ROM21, also encourages improvements to the quality of the environment through the creation of new public spaces, incorporating A3 uses (restaurants and cafés).

LIVEABLE ROMFORD

[Photo to be inserted]

ROM14 – HOUSING SUPPLY

Romford will contribute to the borough's 535 new homes per year housing target through:

- **Redevelopment at higher densities at Victoria Road, South Street (south of the railway) and Regarth Avenue;**
- **The development of the following Site Specific Allocations:**
 - **Angel Way**
 - **Bridge Close**
 - **Como Street**
 - **Station Gateway and Interchange**
- **Encouraging the intensification of single use sites at Homebase (Davidson Way) and Matalan (117 North Street) to provide residential units through mixed use development;**
- **Making better use of space above The Liberty and The Mall and within the Brewery;**
- **Mixed used development within the Romford Office Quarter.**

REASONED JUSTIFICATION

- 1.1 Town centre living is becoming increasingly popular as people are seeking to integrate their working, social and home lives by choosing to live in locations with easy access to facilities and public transport. Urban living increases the sustainability of town centres by reducing the need to travel, supporting the local economy and helping to create livelier and safer town centres.
- 1.2 Residential developments in Romford town centre at the Brewery, the Matrix and the former Dolphin site [Asda] have proved to be extremely successful and a number of other schemes are forthcoming as part of major new mixed use schemes. Romford town centre will be a significant source of new homes in Havering and the Council estimates that the sources identified above will achieve at least 1,500 new homes by 2020. This policy identifies the major opportunities for new housing supply in Romford town centre.
- 1.3 Victoria Road and South Street (south of the railway) are currently low density areas of the town. Intensification of these areas presents the opportunity to replenish the dated and poor quality buildings, provide a scale, massing and height of buildings which is more fitting for these two important entrances to Romford town centre, and secure developer contributions to improve the pedestrian environment and other environmental improvements. Similarly, redevelopment of Regarth Avenue offers the opportunity to provide a more fitting scale of development and to better integrate the area into the new development proposed for the Bridge Close site (see ROMSSA2).
- 1.4 Homebase and Matalan are two single-use retail sites. Taking forward the advice in the Mayor of London's Best Practice Guidance on

Supermarket Sites, the Council welcomes proposals to secure new housing on these sites through mixed-use redevelopment.

- 1.5 The Liberty and Mall shopping centres are currently exclusively in commercial use. However, they both offer the potential for intensification and the Council will support new housing, in addition to the current retail and leisure offer, provided this does not harm the vitality and viability of the retail core.

ROM15 – FAMILY ACCOMODATION

Within the suburban/urban part of the Romford PTAL Zone developments involving the provision of new housing must include some family accommodation of all tenures through:

- **the provision of town housing incorporating two or more bedrooms,**
- **the provision of family accommodation at ground floor level with an enclosed private outdoor amenity area within flat or maisonette developments**

REASONED JUSTIFICATION

- 1.1 Romford town centre is an important location for the provision of new homes for the borough. Development Control Policy DC2 (Housing Mix and Density) identifies Romford as being suitable for housing densities between 50-175 units per hectare in suburban/urban Romford and 165-435 units per hectare in central Romford.
- 1.2 To achieve these densities, recent developments have tended to be almost exclusively one and two bedroom flats. Many of these have been bought as investment properties ('buy to lets') for the private rented sector. The consequence has been that, although the number of people living in the town centre has increased, there is a lack of family accommodation and more settled households of families with longer term commitments to making their home in the town centre. This policy addresses this issue by seeking to secure the provision of family accommodation in the suburban/urban parts of the Romford PTAL Zone to help achieve more mixed and balanced communities. Family accommodation can be provided in high density town housing and on the lower storeys of high density flatted schemes with direct access to ground floor amenity space. The Council will discourage the provision of family accommodation above ground floor level in flatted schemes.

ROM16 – SOCIAL INFRASTRUCTURE

The Council will work in partnership with other bodies (such as Havering PCT and the Local Education Authority) to enable the provision of a suitable range of health and educational facilities in Romford town centre to meet existing and future demand.

REASONED JUSTIFICATION

- 1.1 Provision of the appropriate level of social infrastructure is crucial for delivery of sustainable communities. If more residents are to be encouraged to live in Romford it is important to consider the facilities and services necessary to create balanced, sustainable communities, which are desirable places to live, including medical provision, education and other community facilities.
- 1.2 The new 939 bed Queen's Hospital, situated just outside Romford town centre, opened in December 2006 and brings together the services previously run at Oldchurch and Harold Wood hospitals. In addition, the Market Place development includes new premises for a GP practice. The Council will work in partnership with Havering Primary Care Trust (PCT) to improve access to the quality of GP premises through the Local Improvement Finance Trust (LIFT) programme which is actively searching for a sites/premises in Romford town centre.
- 1.3 Fringe retail destinations (see ROM11) allow for the provision of community facilities provided that active frontages are maintained. This will allow health and other community facilities to be located in the fringe retail areas of South Street, North Street, High Street and Victoria Road.
- 1.4 The Council is currently undertaking a review and reorganisation of primary school provision as part of a programme of modernisation which will take place over the next 15 to 20 years. The review is being undertaken within the context of housing growth in Havering of 535 additional units a year in the period 2007/08 to 2019/20, including new development within Romford town centre. There are currently ten primary schools in the Central Romford locality although none are situated within the Romford Area Action Plan boundary. In the Central Romford locality there is no need to remove surplus places as the forecast surplus capacity is 8%. Some capacity will be taken up from new demand that will be generated from the redevelopment of the former Oldchurch hospital site, while other development in the town centre will also generate new demand to take up this surplus.
- 1.5 The Council will also be undertaking a review and reorganisation of secondary school provision shortly and this will also consider issues around capacity within the context of housing growth and demographic changes. As with the primary school review, this work will be used to inform the provision of additional school places and facilities in Romford town centre as appropriate.
- 1.6 Securing developer contributions is the main planning mechanism for implementing this policy. The Council in negotiating planning obligations will seek contributions towards:

- Additional education provision at primary and secondary level as identified by the LEA. Developers should refer to the Educational Needs Generated by New Development SPD, and the Havering School Organisation Plan 2003-2008 and Addendum for 2004.
- Additional financial support to fund improvements to health services as identified by Havering PCT through the Local Implementation Finance Trust Programme.

ROM17 – GREENING ROMFORD

The Council will work in partnership with developers and funding agencies to increase green space and tree planting within Romford town centre.

Developers will, where appropriate, be expected to contribute towards programmes of tree planting in any of the following:

- **the sites they are developing;**
- **the town centre generally and particularly along thoroughfares;**
- **around the Romford Ring Road;**
- **along the River Rom;**
- **within the Romford Office Quarter.**

In addition, and where appropriate, new development:

- **will be encouraged to incorporate tree planting and green amenity space at surface level and above;**
- **must protect and enhance the existing green spaces and areas of biodiversity value in the town centre, including St Edward the Confessor Church gardens, Coronation Gardens and the town centre railways sidings area which are designated as a Site of Importance for Nature Conservation;**
- **should also enhance pedestrian and cyclist routes to green spaces outside the centre such as Cottons Park, Lodge Farm Park and Raphaels Park.**

REASONED JUSTIFICATION

- 1.1 The role of green spaces as an important cultural feature is recognised in Havering's Cultural Strategy. Green spaces have an important role in improving public health and in providing quiet spaces for the benefit of people and wildlife. They can also provide opportunities for cultural activities and recreation and help recapture an area's historic identity.
- 1.2 Within Romford town centre there are a few small green open spaces at St Edward the Confessor in Market Place, Coronation Gardens on Main Road, and adjacent to the Liberty Car Park. However, the limited

amount of green open space is compensated for by the high quality parks just outside the town centre: Cottons Park to the west and Lodge Farm and Raphael Parks to the east. A new park will also be provided as part of the development on the former Oldchurch Hospital site. Therefore the focus of this policy is to increase green space within Romford town centre, principally in connection with new development, and in line with policies ROM4 and ROM5 to improve pedestrian and cyclist access to the parks just outside the centre.

- 1.3 The policy also aims to increase tree cover in the town centre in recognition of their biodiversity and streetscape benefit. The positive impact of trees in the streetscene is apparent along the High Street and on Eastern Road within the Romford Office Quarter. Tree planting is an integral part of the 'Greening the Ring Road' project which is one of the Mayor of London's 100 Public Spaces Programme. The greening of the Ring Road will also help to enhance the more recent urban identity of Romford and create a circuitous boulevard which better links the town centre to its suburban hinterland through pedestrian and cycling linkages.
- 1.4 The area between Bridge Close and the railway is designated a Borough Site of Importance for Nature Conservation. There are opportunities along this stretch of railway land to increase existing biodiversity value as new development opportunities come forward, particularly in connection with ROMSSA2 (Bridge Close).

ROM18 – RIVER ROM

The Council will work in conjunction with other bodies, including the Environment Agency, to restore the River Rom through the town centre. The Council will use development opportunities to enhance the River Rom and will place significant emphasis on improving public accessibility through the creation of a river pedestrian route, opening up culverts and naturalising the river channels. Where appropriate, contributions may be sought from developers to enable this.

REASONED JUSTIFICATION

- 1.1 The Environment Agency's 'Bringing Your Rivers Back to Life' strategy highlights the role that river restoration can have in transforming urban landscapes. The River Rom is a resource with considerable potential in Romford. Although it runs through the centre of the town, it is largely hidden and is not currently a significant feature of the townscape. Redevelopment in Romford town centre presents the opportunity to reveal elements of the River Rom as an amenity, recreation and wildlife feature.
- 1.2 The River Rom has been identified by the Environment Agency as a priority location for river restoration and deculverting. Enhancements to the River Rom have the capacity to provide a recreational resource, an

important wildlife habitat, contribute to the public realm by providing an attractive setting to the surrounding environment and provide regeneration opportunities. It will also reduce flood risk by making space on site for flood waters to be stored. It is therefore important to protect this environment and seek opportunities to enhance it. This can be undertaken as development opportunities arise at Angel Way, Bridge Close and Como Street (see Site Specific Allocations ROMSSA1-3).

ROM19 – TALL BUILDINGS

Planning permission for buildings of 6 storeys or greater, or over 18 metres above ground level, will normally only be granted in the following locations:

- **Along the Ring Road at the junctions of Angel Way, High Street, Main Road, North Street, South Street and Western Road;**
- **Near Romford Station (within ROMSSA6); and**
- **Romford Office Quarter.**

All tall buildings should be of exemplary high quality and inclusive design and must comply with policy guidance as set out in DC66.

REASONED JUSTIFICATION

- 1.1 The largest concentration of tall buildings in Havering is within Romford town centre and this is considered to be the most appropriate location in the borough for tall buildings. For the purposes of the Local Development Framework tall buildings are defined as buildings of 6 storeys or greater or over 18 metres in height above ground level.
- 1.2 This policy identifies those locations within Romford town centre where tall buildings of exemplary high quality design are considered acceptable. Tall buildings along the key entrances off the Ring Road will help define their status as gateways into the town centre. Similarly, a tall building within the Romford Station Gateway and Interchange site [ROMSSA6] will increase the legibility of the town centre by signifying the status of this location as the borough's principal public transport interchange. As outlined in ROM13, tall buildings will enable the redevelopment of the existing outdated office stock in the Romford Office Quarter. Applicants are encouraged to refer to the guidance in the CABE/English Heritage publication 'Design Guidance for Tall Buildings' (2003).

ROM20 – URBAN DESIGN

In line with Development Control Policy DC61 (Urban Design), high quality design-led development will be required in Romford. In addition to the criteria in DC61, development will be required to:

- **respect the scale and massing of existing buildings in the Market Place;**
- **reinforce Romford's traditional street layout;**
- **preserve or enhance the view of the spire of St Edward the Confessor from the bottom of South Street (Romford Station) and other local views which enhance the centre's legibility;**
- **reinforce the prominence and importance of the High Street/North Street axis; and**
- **increase civic pride by instilling a sense of place.**

REASONED JUSTIFICATION

- 1.1 It is important that all new development in Romford town centre is of high quality in terms of architectural and urban design if it is to compete with nearby town centres and out of town shopping centres and attract the right sort of investment. This will help promote civic pride and instil a sense confidence amongst the community and investors.
- 1.2 Traditionally Romford has been arranged along two axes: South Street - North Street and High Street - Market Place. The east - west route through the market follows the line of the Roman Road from London to Colchester.
- 1.3 The Market Place has traditionally been the nucleus of the town. The development of Laurie Hall in the mid 1850s changed the character of Market Place meaning it was built on three sides and changing its traditional form. The development of the Ring Road in the 1960s accentuated this further. New development presents an opportunity to increase the scale of buildings around the square to increase the sense of enclosure and its civic importance.
- 1.4 North Street and South Street was the route from Havering Palace to Hornchurch. The spire of St Edward the Confessor pierces the skyline in the view up South Street from Romford Station, signalling the historic heart of Romford. It is important that this view is not adversely affected by new development so the legibility of the town centre is maintained, particularly as the Area Action Plan aims to increase the civic importance of the Market Place
- 1.5 The junction of South Street and High Street forms the historic crossroads of Romford. The Golden Lion, which is situated on the north western corner of the crossroads, is one of only two surviving coaching inns in London. The crossroads are at the heart of the Romford Conservation Area and any new development must reinforce its prominence and importance.
- 1.6 Elsewhere, Romford's traditional street pattern is still apparent. For example, to the west of the crossroads the High Street retains the

typical medieval curving approach with its burgage plots still identifiable running down towards the Brewery site. It is important that the traditional street layout in the town centre is reinforced by new development, such as the retention of the historic frontage of the Romford Brewery along High Street.

ROM21 – PUBLIC SPACES

The provision of new, high quality, hard landscaped public spaces will be promoted, particularly within the Romford Office Quarter, as part of any redevelopment of Romford Station Gateway and the adjoining area, and any redevelopment of the Brewery.

REASONED JUSTIFICATION

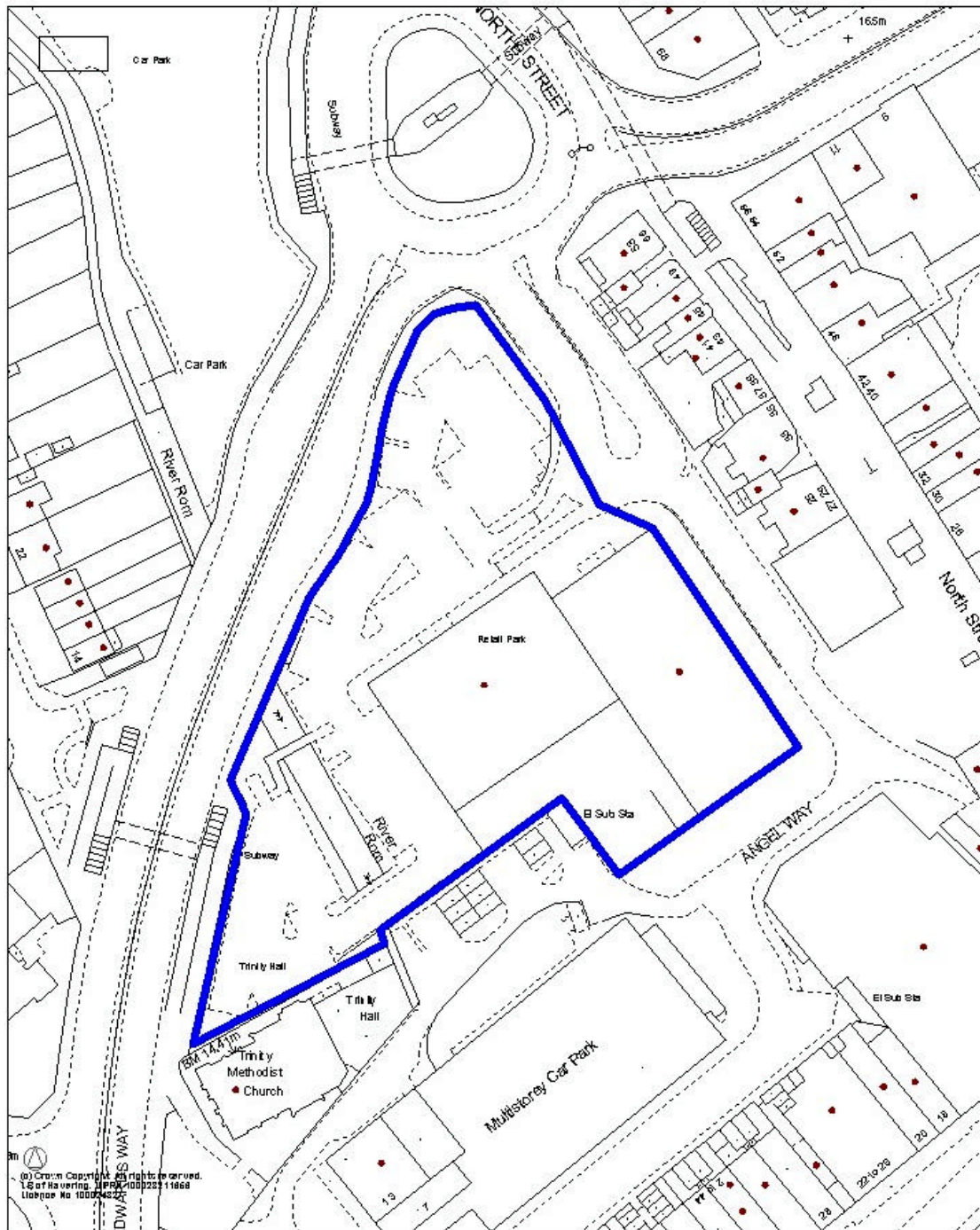
- 1.1 Opportunities exist within the Angel Way and Bridge Close sites, Romford Office Quarter, and through any redevelopment of the Romford Station Gateway and the Brewery to create new public spaces. In addition, the Romford Market Strategy (see ROM7) presents the opportunity for the development of a new town centre public square and event space. The strategy for providing these spaces is developer-led and the Council will explore the opportunities to progress this policy in conjunction with developers.

10 Site Specific Allocations



ROMSSA1 – ANGEL WAY

Map reference	
Location and site description	Land inside the Ring Road, which forms the northern and western boundaries of the site. The southern boundary is formed by Trinity Methodist Church, Trinity Hall and Angel Way, which also forms the eastern boundary.
Area (ha)	0.84
PTAL	5-6
Implementation	The site is owned by private developers. A planning application for this site is expected in autumn 2007 and the Council considers that development of this site will come forward early on in the timeframe of the Area Action Plan. The Environment Agency supports the Council's aspirations for opening up the River Rom in the town centre (including this site). The developers have met with the Environment Agency and are aware of the Council's aspirations for the River Rom.
Applicable Area Action Plan policies	ROM4, ROM8, ROM9, ROM11, ROM14, ROM16, ROM17, ROM18, ROM19, ROM20, ROM21
<p>A mix of residential, retail, leisure and commercial development will be allowed within the Angel Way site provided that:</p> <ul style="list-style-type: none"> • Residential development is within the 240-435 units per hectare density range; • A tall building is provided at the junction of Angel Way and St Edwards Way in line with ROM19; • Buildings embrace the Ring Road frontage; • Pedestrian links to North Street and High Street are improved; • A new public square is provided in the south east corner of the site to enhance the public realm; • The amenity, recreational and ecological value of the River Rom is enhanced; and • Retail uses do not harm the vitality and viability of the Retail Core of Romford town centre. 	

ROMSSA1: Angel Way



ROMSSA1: Angel Way

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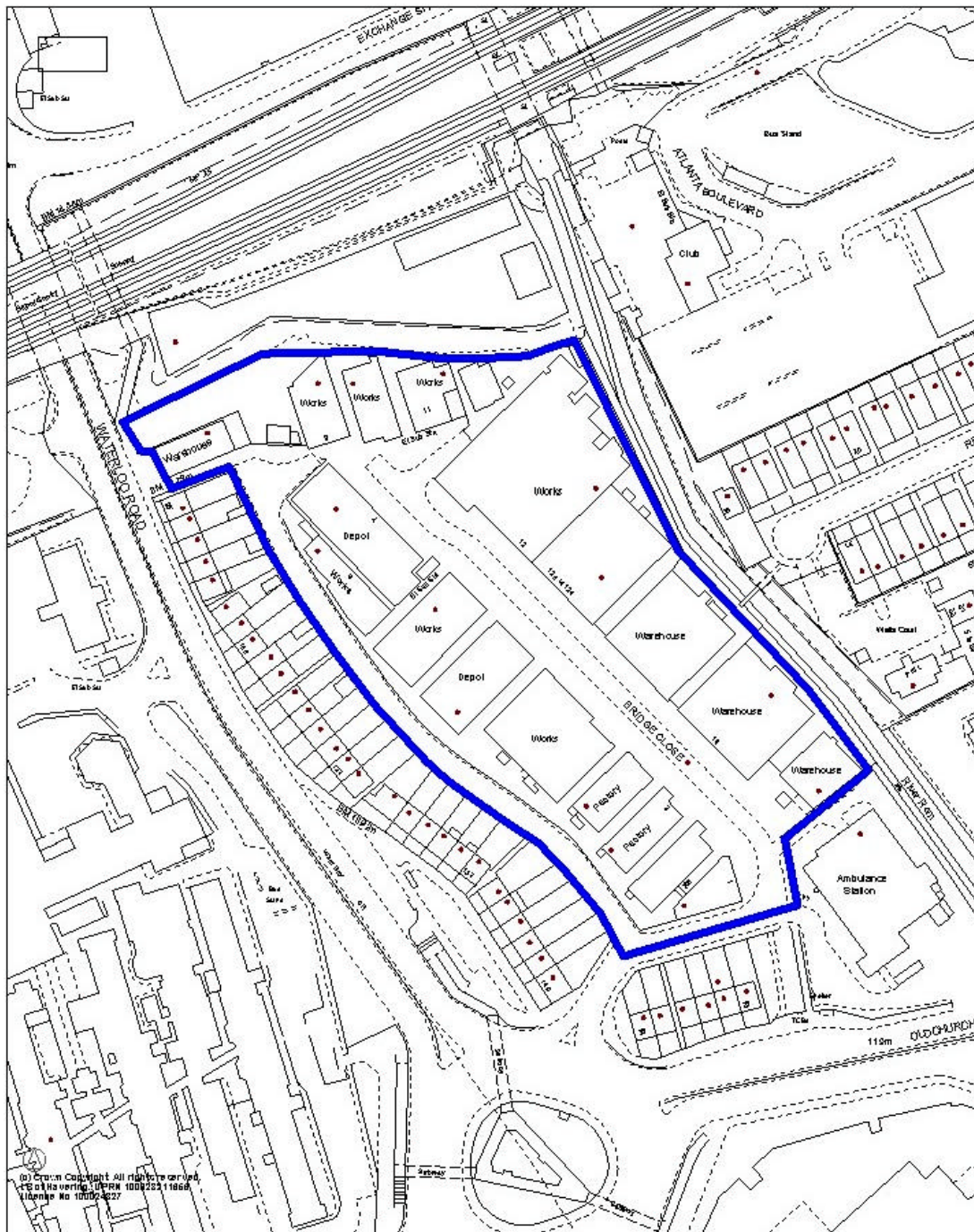
REASONED JUSTIFICATION

- 1.1 Angel Way is a key development site within the town centre which the Council considers has the potential for a major mixed-use scheme incorporating housing, leisure and commercial, and smaller format retail units. The site offers a major opportunity for a landmark scheme for Romford town centre. In the past several large retail stores have occupied this site but have been unsuccessful in developing a consistent customer base. This is supported by the Havering Retail and Leisure Study which suggests that in a number of 'fringe' locations in Romford, redevelopment solely reliant on retail space may not be the most suitable option. Instead, genuine mixed-use schemes with a range of town centre uses, including retail, leisure, residential and business space may be more appropriate. Although situated outside the retail core and fringe of the town centre, this site is considered appropriate for some retail uses. These should be smaller scale units which do not harm the vitality and viability of the retail core, particularly the adjacent North Street.
- 1.2 The existing development has its back to North Street and the town centre. Any new development of the site should ensure that the pedestrian environment between the site and North Street and High Street is improved to ensure a more effective integration with the town centre. In line with this, a new public square should be provided in the south east corner of the scheme. This will ensure that additional public space is provided within the town centre but will also enable this to integrate with the public space on North Street in and around the new Rubicon development.
- 1.3 Development should also seek to enhance the River Rom in line with ROM18 and developers will be expected to work in conjunction with the Council and the Environment Agency to achieve this. River restoration offers the opportunity to reveal elements of the river as an amenity and recreational feature of the site. Developers should consider how best to incorporate the river into their scheme, in particular to consider options for improved pedestrian access along the river or its use as a public space.



ROMSSA2 – BRIDGE CLOSE

Map reference	
Location and site description	<p>Havering's Employment Land Review identifies this site for release from employment use. It is situated to the south of the London – Colchester Great Eastern Main Line to the east of Waterloo Road (and to the rear of numbers 95-149 Waterloo Road). The southern boundary of the site is to the rear of the Ambulance Station and numbers 26-36 Oldchurch Road and the eastern boundary is formed by the River Rom.</p>
Area (ha)	1.88
PTAL	5-6
Implementation	<p>This site has been in multiple ownership but a site in unified ownership is being assembled in anticipation of its redevelopment. The Environment Agency supports the Council's aspirations for opening up the River Rom in the town centre (including this site).</p>
Applicable Area Action Plan policies	<p>ROM4, ROM5, ROM8, ROM14, ROM16, ROM17, ROM18, ROM20, ROM21</p>
<p>Residential development with some commercial uses (A3) will be allowed within Bridge Close provided that:</p> <ul style="list-style-type: none"> • Residential development is within the 240-435 units per hectare density range; • A3 uses are at ground level and located along the River Rom frontage; • The development incorporates new public spaces; • The amenity, recreational and ecological value of the River Rom is enhanced, including the development of a riverside pedestrian route; • Pedestrian and cycle links are improved to the former Oldchurch Hospital site, Queen's Hospital and Romford Station; • The development is sensitive to the privacy and amenity of the existing housing along Waterloo Road and Oldchurch Road; • Assistance is provided to existing businesses to find alternative locations; and • The adjacent Borough Site of Importance for Nature Conservation is protected and enhanced. 	

ROMSSA2: Bridge Close



ROMSSA2: Bridge Close

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REASONED JUSTIFICATION

- 1.1 Bridge Close is situated to the south of the town centre between the railway line and the Ring Road and is Romford's most significant large-scale residential opportunity. There is a major opportunity to enhance Romford's distinctiveness and attractiveness by creating a new waterfront quarter around the River Rom in this location. Waterfront access and views are highly sought after, particularly for housing and leisure uses, where water can provide pleasant aspects for occupiers and an attractive environment (see ROM18).
- 1.2 The Bridge Close estate is the only existing industrial location in Romford town centre and contains smaller independent businesses and light industrial uses. The review identified that approximately 15–20% of general industrial use buildings (B2 use class) at Bridge Close were unoccupied, indicating low demand for these premises at this location. This is supported by the limited take up of general industrial use buildings in Romford. The review also noted that the site is constrained on all four sides and businesses would find it difficult to expand at Bridge Close. The Havering Employment Land Review recommended that Bridge Close should be de-designated as employment land and re-allocated for mixed-use development.
- 1.3 ROMSSA2 proposes a new mixed-use waterfront quarter comprising residential development with some A3 uses (cafés and restaurants) fronting the River Rom.
- 1.4 The River Rom is an under-used resource in Romford and the redevelopment of this site, in particular, offers the opportunity to use the river as a major feature of a new town centre scheme as well as improving the natural environment and creating a new river walkway. This site offers the best opportunity for opening up the River Rom and improving the environment and this should be central to any development proposals for the site. Developers will be expected to work closely with the Council and the Environment Agency to ensure that the river is enhanced to be a key feature of the site.
- 1.5 There is also the potential to introduce some new open spaces along a riverside walkway which would enhance the recreational potential of the river and help fulfil the town's need for recreational green space, which is currently under-provided. The walkway will be expected to be attractively lit with a landmark footbridge crossing the river and would provide an important new link between Bridge Close, the Queen's Hospital, the Oldchurch site and the town centre.
- 1.6 In line with the recommendations of the Havering Employment Land Review, the Council is retaining the secondary employment sites on Crow Lane and at Lyon Road to ensure that there is sufficient opportunity for businesses to maintain their presence in Romford. The

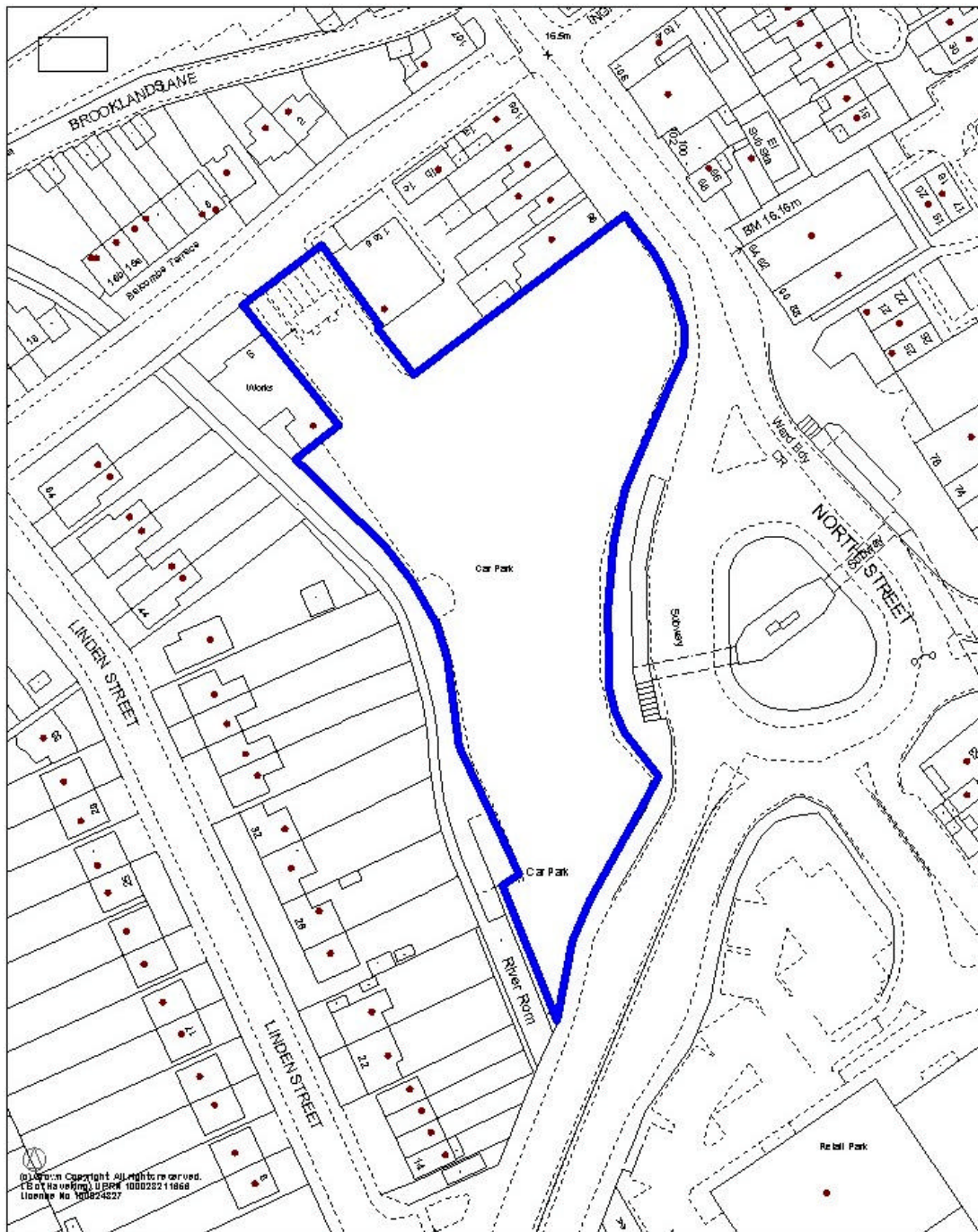
Council will work in conjunction with the developer and companies currently based at Bridge Close on a business relocation programme.

- 1.7 Land to the north of the site and adjacent to the railway line is designated as a Borough Site of Importance for Nature Conservation and any development at Bridge Close should ensure that the environmental value of this land is protected and enhanced.

ROMSSA3 – COMO STREET


Map reference	
Location and site description	The site is located to the north-west of the junction of North Street with St Edward's Way. The western boundary of the site is formed by the River Rom. To the north, the site is adjoined by commercial premises fronting onto Como Street and North Street.
Area (ha)	0.58
PTAL	5-6
Implementation	The site has been marketed by the Council for redevelopment. The Environment Agency supports the Council's aspirations for opening up the River Rom in the town centre (including this site). Funding has been secured from Transport for London for a feasibility study into the remodelling of the North Street / Ring Road roundabout adjacent to the Como Street site.
Applicable Area Action Plan policies	ROM4, ROM6, ROM11, ROM14, ROM15, ROM16, ROM17, ROM18, ROM20, ROM21
<p>Residential development with ancillary fringe retail uses along North Street will be allowed within the Como Street site provided that:</p> <ul style="list-style-type: none"> • Residential development is within the 165-275 units per hectare density range and some family accommodation is provided in line with ROM15; • The development embraces the Ring Road frontage; • Active frontages are provided at ground floor level along the existing and potentially extended North Street frontage in line with ROM11; • The amenity, recreational and ecological value of the River Rom is enhanced; • The development is sensitive to the privacy and amenity of the existing housing along Como Street and Linden Street; • Any development of the site, as currently designated, does not prevent the implementation of the junction re-modelling at a future date; and • Subject to the outcome of a feasibility study, developer contributions are provided to enable the replacement of the North Street roundabout with a signal-controlled junction and surface level pedestrian crossing. 	

ROMSSA3: Como Street



ROMSSA3: Como Street




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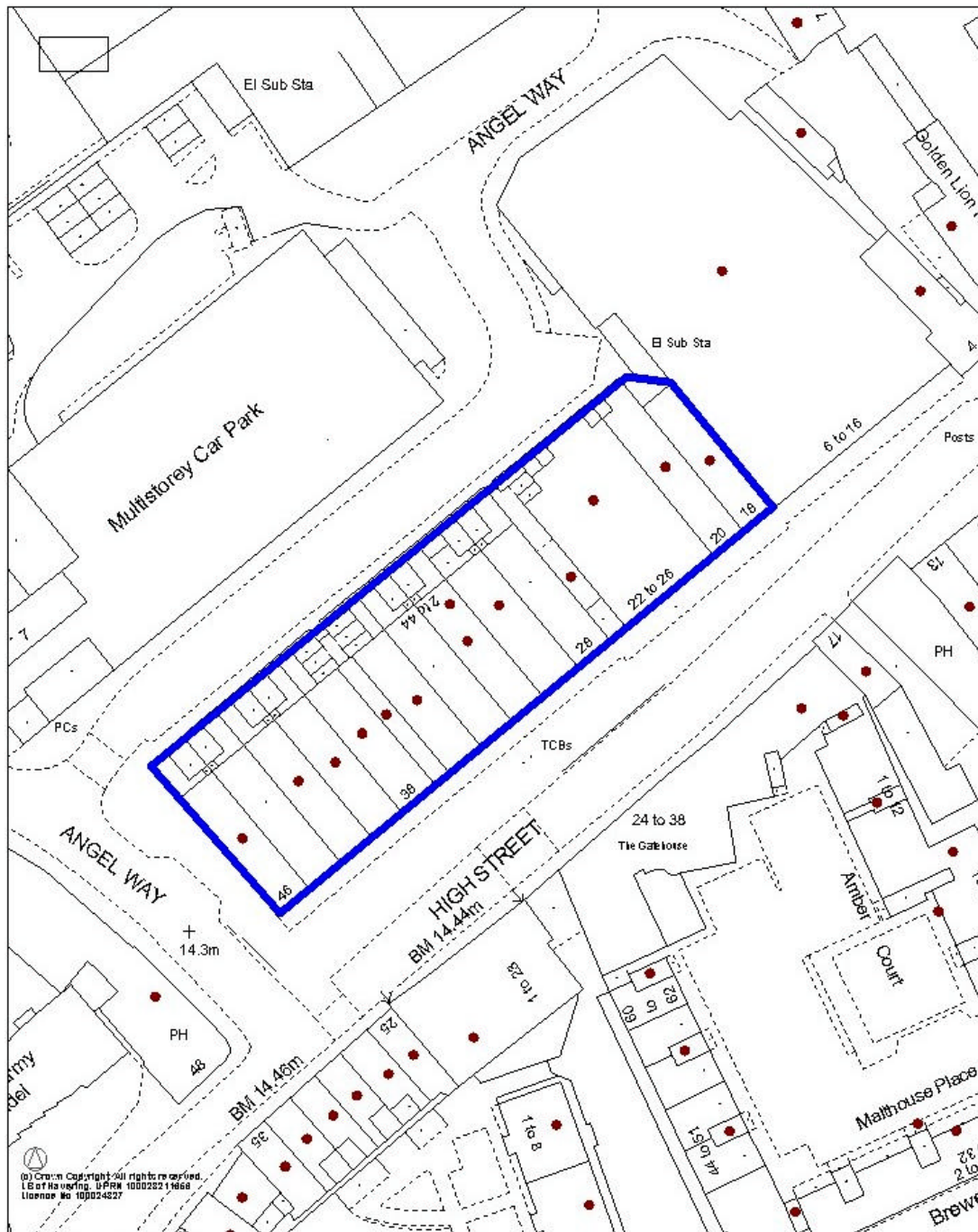
REASONED JUSTIFICATION

- 1.1 The Como Street site is a Council-owned former surface level car park which has been marketed for redevelopment. The site is situated on the northern side of the Ring Road between North Street, the River Rom and Como Street. The site offers the opportunity for a new residential scheme with some retail uses at ground floor on the North Street side of the site.
- 1.2 Residential development on the site will be of medium density and, in line with ROM15, include family accommodation.
- 1.3 Development should embrace the Ring Road and present a high quality built frontage to North Street. Active frontages should be provided at ground floor level along the North Street frontage in line with ROM11.
- 1.4 Development should also seek to enhance the River Rom in line with ROM18 and developers will be expected to work in conjunction with the Council and the Environment Agency to achieve this. River restoration offers the opportunity to reveal elements of the river as an amenity and recreational feature of the site. Developers should consider how best to incorporate the river into their scheme, in particular to consider options for improved pedestrian access along the river.
- 1.5 Subject to the result of a feasibility study, replacing the North Street roundabout with a signal-controlled junction and surface level pedestrian crossing would result in an enlarged development site of approximately 0.87ha [an additional 0.29ha or 50% of the site area]. This would also increase the frontage onto the Ring Road and North Street and offer greater opportunity to link the site to the town centre and any new development at Angel Way. Any development of the Como Street as currently designated should not prevent the implementation of the junction remodelling at a future date and a s106 contribution may be expected.
- 1.6 The introduction of a signalled junction presents an opportunity to use the best of modern technology to make the road more responsive to traffic and pedestrian needs. The removal of the subway at the North Street roundabout will benefit pedestrian safety and convenience and also create more street space, which would be a pre-requisite for the introduction of the East London Transit route.
- 1.7 This area is thought to have been the original Roman crossing point. In line with Development Control Policy DC70 (Archaeology and Ancient Monuments) developers should take into account the archaeological significance of the site and take appropriate measures to safeguard that interest.

ROMSSA4 – 18-46 HIGH STREET

Map reference	
Location and site description	Land on the north side of High Street, to the east of Angel Way and to the west of number 16 High Street (Woolworths). The site currently comprises shops at ground floor level, offices at first floor level and 22 flats on the second and third floors.
Area (ha)	0.25
PTAL	5-6
Implementation	The Council owns the shops and the River Chambers and Ballard Chambers offices on the first floor. Of the 22 flats (2-44 High Street) situated above, 11 are Council owned and 11 are privately owned.
Applicable Area Action Plan policies	ROM4, ROM6, ROM11, ROM14, ROM20, ROM21
<p>Development comprising residential, retail and commercial uses will be allowed provided that:</p> <ul style="list-style-type: none"> • Residential development is within the 240-435 units per hectare density range; • Active frontages are provided at ground floor level in line with ROM11 • It reinforces the historic entry to Romford by improving legibility and enhancing the contribution to the Conservation Area. <p>Developers' contributions will be sought towards streetscape improvements along High Street.</p>	

ROMSSA4: 18-46 High Street



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ROMSSA4: 18-46 High Street



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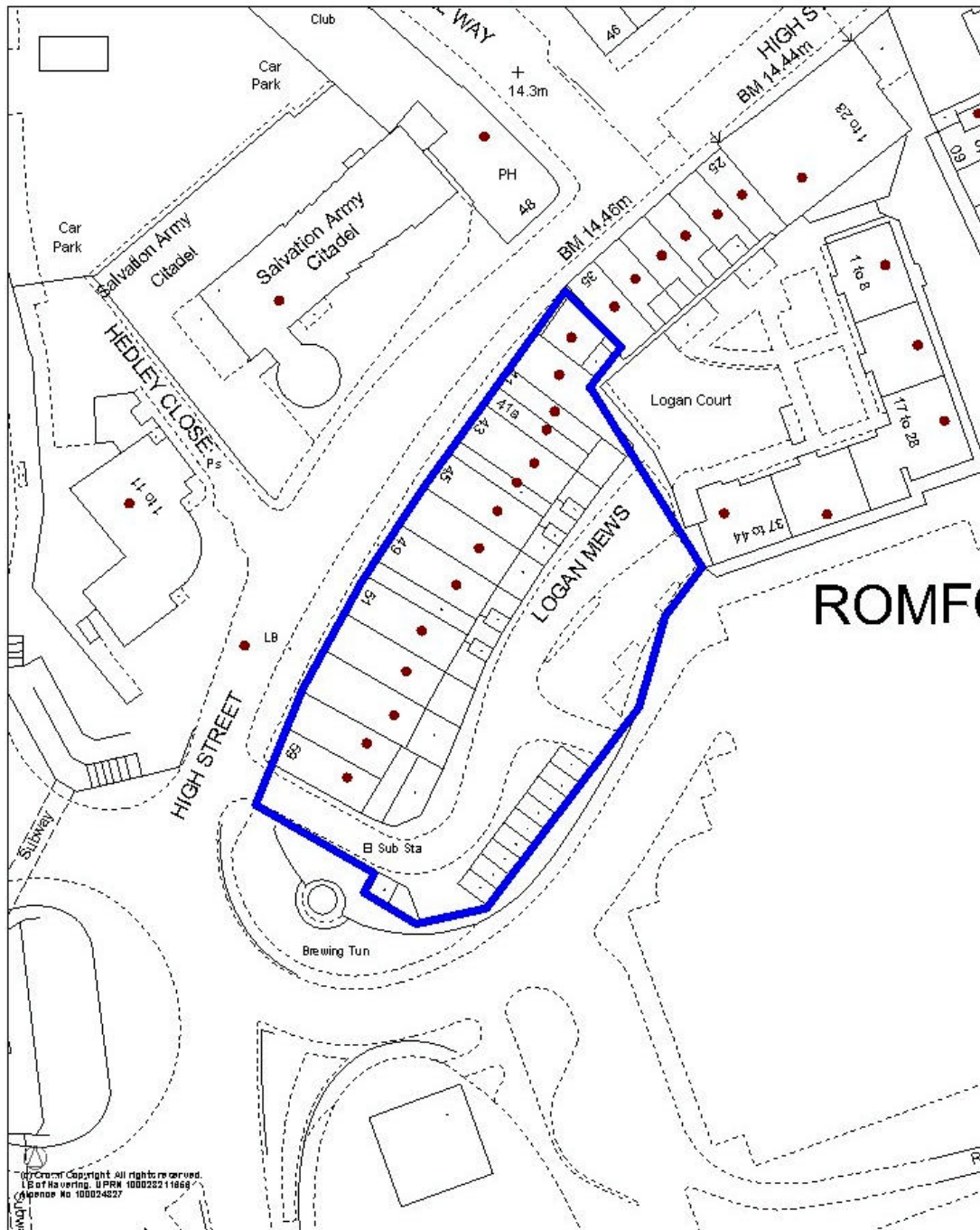
REASONED JUSTIFICATION

- 1.1 This site currently comprises a mixed-use retail, office and residential block which is in need of refurbishment and which presents a development opportunity to help to deliver the Area Action Plan proposals for High Street.
- 1.2 High Street is an integral part of Romford's retail offer, is an important historic gateway into the town centre and forms part of the Romford Conservation Area. However, the Havering Retail and Leisure Study suggests that High Street could benefit from the development of mixed-use schemes to strengthen and enhance its vitality and viability (see ROM11). This allocation will allow for redevelopment of the site, retaining commercial uses at ground floor level but providing increased residential above. It seeks to inject new life into the area and strengthen its role in the town centre by enabling a wider range of uses to locate here to complement its existing retail function. By doing this, it is anticipated that pedestrian activity in this area will be increased to the benefit of existing and future occupiers.
- 1.3 Development of this site should also provides the opportunity to improve the public realm to the front and the rear of the site, which is particularly problematical given its relationship to the Angel Way multi-storey car park. Developer contributions will be sought towards streetscape improvements along High Street as part of any redevelopment.
- 1.4 High Street retains the typical medieval curving approach with its burgage plots still identifiable running down towards the Brewery site. It is important that the traditional street layout is reinforced by new development, as exemplified by the retention of the historic frontage of the Romford Brewery opposite this site. Therefore, development of this site should compliment the Victorian setting of the area, in particular the proposed Museum to be situated in the former Brewery building opposite, and enhance its contribution to the Romford Conservation Area. A Heritage Statement must be provided demonstrating this.

ROMSSA5 – 37-59 HIGH STREET

Map reference	
Location and site description	Land on the south side of High Street, to the east of Waterloo Road and to the west of number 35 High Street. The site currently comprises shops at ground floor level and 19 flats on the first and second floors. 8 garages, an Electricity Sub Station and a number of car parking spaces are situated to the rear of the premises.
Area (ha)	0.30
PTAL	5-6
Implementation	The Council owns the shops at numbers 39-55 High Street. Of the 12 flats (49B-55C) situated above, 8 are Council owned and 4 are privately owned. The garages to the rear of the premises are Council owned. The shops at numbers 37 and 57-59 High Street are in private ownership as are the 7 flats situated above. The Electricity Sub Station is in private ownership, as are the car parking spaces.
Applicable Area Action Plan policies	ROM4, ROM6, ROM11, ROM14, ROM19, ROM20, ROM21
<p>Development comprising residential, retail and commercial uses will be allowed provided that:</p> <ul style="list-style-type: none"> • Residential development is within the 240-435 units per hectare density range; • Active frontages are provided at ground floor level in line with ROM11; • It reinforces the historic entry to Romford by improving legibility and enhancing the contribution to the Conservation Area; and • It considers links from the rear of this site into the Brewery. <p>In line with ROM19 there is the potential for a tall building at the western end of the site at the junction with the Ring Road.</p> <p>Developers' contributions will be sought towards streetscape improvements along High Street.</p>	

ROMSSA5: 37-59 High Street



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ROMSSA5: 37-59 High Street



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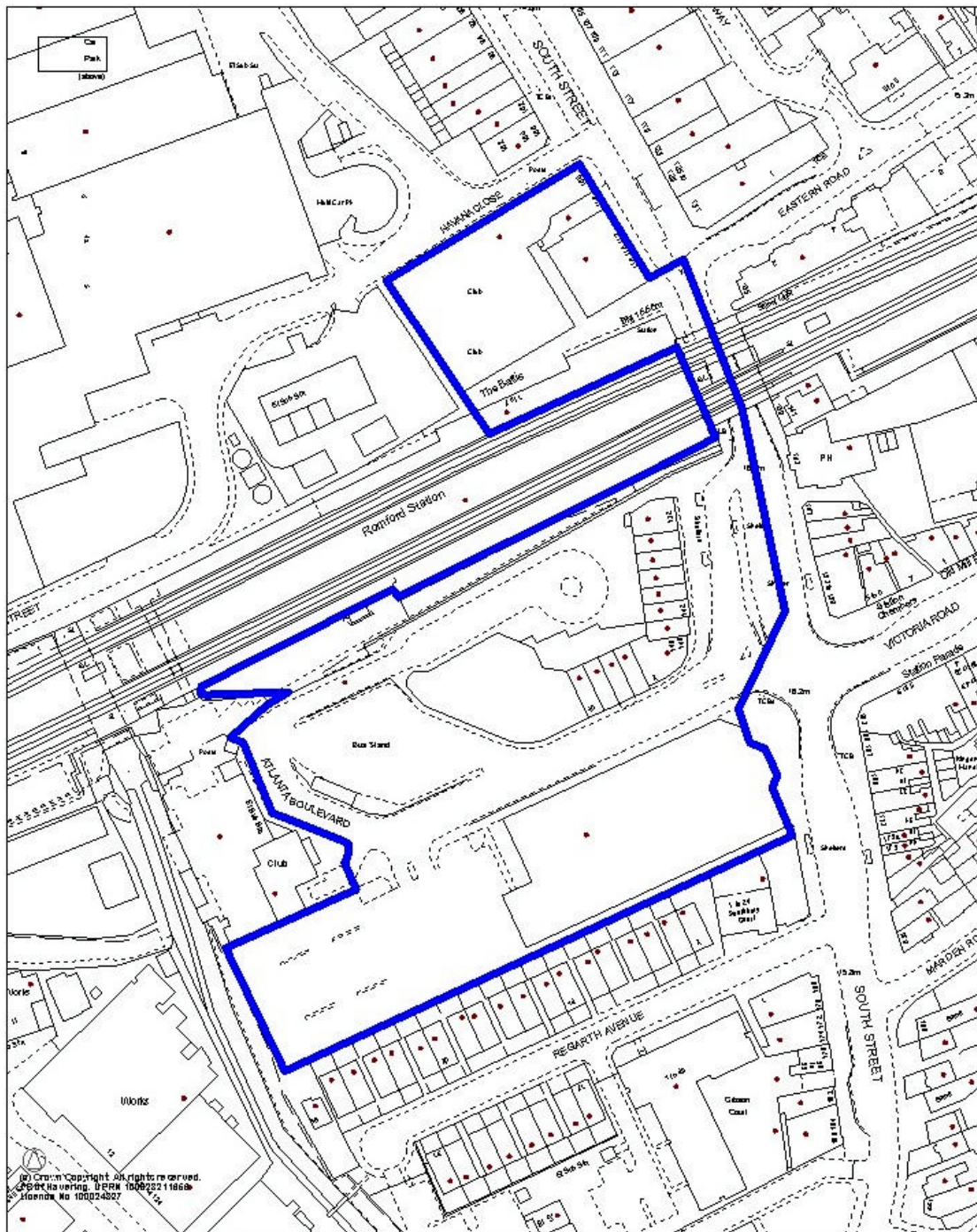
REASONED JUSTIFICATION

- 1.1 This site currently comprises retail uses at ground floor level with residential above and presents a potential development opportunity which will help to deliver the Area Action Plan proposals for High Street. The site also includes the garages, parking spaces and electricity sub station to the rear of the premises [on Logan Mews]. These form a barrier between the site and the Brewery development to the rear.
- 1.2 High Street is an integral part of Romford's retail offer, is an important traditional gateway into the town centre and forms part of the Romford Conservation Area. The Retail and Leisure Study identified this section of High Street as having the potential for redevelopment. As with ROMSSA4, redevelopment of this site offers the opportunity to improve the environment in High Street and to provide an uplift in the quality of development and premises for these businesses. This allocation will allow for redevelopment of the site, retaining retail uses at ground floor level but providing increased residential above. In line with ROM19 there is the potential for a tall building at the western end of the site at the junction with the Ring Road. Development of this site must enhance its contribution to the Romford Conservation Area and a Heritage Statement must be provided demonstrating this.

ROMSSA6 – STATION GATEWAY AND INTERCHANGE

Map reference	
Location and site description	Land to the north and south of the railway line, including Romford station. The northern boundary of the site is formed by Havana Close and includes numbers 108-116 South Street. South of the railway line the site includes the station bus stops, the parade of shops at 132-148 South Street and 2-10 Atlanta Boulevard, the bus stand on the north of Atlanta Boulevard and the Fitness First and Lidl sites on the south of Atlanta Boulevard.
Area (ha)	2.18
PTAL	5-6
Implementation	The bus station and bus waiting facility is owned by Network Rail. The retail parade situated within this land is owned by a third party. The Lidl and Fitness First sites are in private ownership. Havering Council will work in partnership with Transport for London, Network Rail, Cross London Rail Links and other landowners to implement this policy.
Applicable Area Action Plan policies	ROM1, ROM2, ROM4, ROM5, ROM10, ROM14, ROM16, ROM17, ROM19, ROM20, ROM21
<p>In line with ROM1, a major transport interchange and residential, retail, leisure and commercial uses will be allowed provided that:</p> <ul style="list-style-type: none"> • Proposals incorporate better integrated facilities between different transport modes, including increased bus stand capacity; • Proposals deliver a significant improvement in the townscape and pedestrian environment at Romford Station and the adjoining area; • Residential development is within the 240-435 units per hectare density range with a variety of building footprints and buildings of 4-6 storeys and above; • Any development is anchored by a landmark tall building (see also ROM1 and ROM19); • Retail development is provided at ground floor level along South Street to the south of the Station provided it does not harm the vitality and viability of the retail core of Romford town centre; and • Development at ground floor level north of the station satisfies ROM10 <p>Development proposals must provide safe, convenient and attractive direct pedestrian and cyclist access to the station from Victoria Road, South Street (north and south of the Station) and Atlanta Boulevard;</p> <p>New development must be compatible with the proposed Crossrail and East London Transit Schemes.</p>	

ROMSSA6: Station Gateway and Interchange



ROMSSA6: Station Gateway and Interchange



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REASONED JUSTIFICATION

- 1.1 Romford Station Interchange and the areas on either side of the station are collectively known as 'Romford Gateway'. This reflects the fact that the station is the main public transportation hub within Romford town centre and Havering generally. The continued success and vitality of the town centre relies on an attractive and convenient transport interchange which not only fulfils its primary transport functions successfully, but also acts as an appropriate gateway to welcome visitors to Romford. This site therefore offers a major opportunity to make far better use of the land, particularly south of station, and provide a development which befits this locations gateway status, delivers a significant improvement to the pedestrian environment, and access to and interchange between public transport and the streetscape. It also enables development to anticipate and facilitate the proposed Crossrail and East London Transit schemes. In particular, it will enable the Council to build on the access improvements for pedestrians that it secured by its involvement in the Parliamentary process for Crossrail in early 2007.
- 1.2 The existing bus station facility immediately adjacent to the southern side of the railway station is busy and serves most of the routes that pass the station. It is, however, poorly laid out and no longer meets the community's expectations for an important transport facility.
- 1.3 Some bus stops at the facility are served by so many routes that the current layout is confusing to passengers. Further, the waiting facilities are inadequate for bus times and the pedestrian routes between the bus stops and the station (and South Street and the town centre) are poorly designed and lead to major conflicts between pedestrians and bus vehicle movements.
- 1.4 In addition to the bus station and accompanying bus stops on South Street and Atlanta Boulevard, there is a significant bus waiting facility behind the retail outlets at the bus station, accessed from Atlanta Boulevard. This facility is where several busy routes 'layover' between runs. New development presents an opportunity to address these problems by providing a better integrated bus and transit facility with increased bus stand capacity.
- 1.5 The site also includes the Fitness First and Lidl sites on Atlanta Boulevard. These are currently low density, single use sites with substantial surface level car parking and their incorporation into ROMSSA6 offers the opportunity for a more intensive level of development commensurate with its location in a PTAL 6 Zone. To reinforce the centre and enhance the streetscape, commercial uses should be provided at ground floor along the South Street frontage south of the station. North of station, core retail policy must be satisfied.

11 Implementation and Monitoring

Introduction

- 11.1 The Romford Area Action Plan Vision will be achieved through the implementation of the strategic objectives, the specific policies and the delivery of the Site Specific Allocations. To deliver the vision and implement the Area Action Plan, it is essential for the Council to continue to work in partnership with a range of stakeholders in the public, private and community and voluntary sectors. These include: land and property owners (for example, Network Rail, Henderson Global Investors and Cosgrave); developers; businesses such as national and local retailers, leisure operators, and key local employers; members of the Romford Town Centre Partnership (LBH, AON, The Liberty, Cosgrave, The Mall, The Brewery, The Beadie Group, Metropolitan Police, St Edwards Church, Romford Shopping Hall); transport providers (in particular, Transport for London, Network Rail, One Railway, Arriva and Crossrail); the GLA; the Environment Agency; infrastructure providers; Metropolitan Police; Havering Primary Care Trust; residents and local groups.
- 11.2 The success of the Romford Area Action Plan will depend upon effective and co-ordinated delivery. The Council will establish a dedicated Romford Town Centre Action Forum which will be charged with delivering the actions within the Romford Urban Strategy and Romford Area Action Plan. Implementation progress will be monitored against Area Action Plan indicators. The forum will complement the work of the Romford Town Centre Partnership.
- 11.3 The Romford Town Centre Partnership (RTCP) primarily supports the regeneration of Romford both as a commercial centre and as the main town centre serving the whole of Havering's community. It consists of a Board and sub groups, such as the Joint Marketing Group and Safe and Sound group. RTCP members are from senior positions in the key public sector partners, principally the Council and Metropolitan Police, together with a wide range of private sector and community partners, such as retail centre managers, employers and church representatives.

Funding

- 11.3 Funding will be an important factor in implementing the Romford Area Action Plan. The majority of the Area Action Plan policies will be implemented by private sector developers, land and property owners and businesses, with the Council acting corporately as an enabler through the planning process. Where appropriate, contributions will be sought in connection with new development toward the cost of delivering public infrastructure, transport and public realm improvements across Romford town centre. Aside from funding secured through developer contributions, other important funding

sources include Transport for London funding through the Local Implementation Plan (LIP) process, funding from the London Development Agency and the Council's own capital funding.

- 11.4 The Council is confident that the Site Specific Allocations included in the Action Plan will be delivered by 2020. Without exception they have already been the subject of developer interest and significant progress has been made already in resolving landownership issues where these exist. Whilst the Site Specific Allocations policies represent the Council's priorities for the sites they are also sensitive to what the market can deliver.

Monitoring

- 11.5 The Council will monitor the implementation of the Romford Area Action Plan, and performance against the plan's objectives. This section sets out a series of indicators and, where possible, targets against which progress will be monitored. Some indicators are LDF Core Output Indicators set by the Department for Local Government and Communities. The Council's LDF Annual Monitoring Report will provide information on the indicators and include the related targets described below.
- 11.6 Underpinning this monitoring framework is a robust evidence base including:
- Havering Employment Land Study (2006)
 - Havering Housing Needs Survey Update (2006)
 - Havering Open Space and Sports Assessment (2005)
 - Havering Retail and Leisure Study (2006)
 - London Housing Capacity Study (2005)
- 11.7 These will be reviewed, on average, every five years and these detailed assessments will augment the data in the Annual Monitoring Report.
- 11.8 Internal working groups will also help the implementation and monitoring of Romford Area Action Plan policy. These enable policy to be communicated widely, and the impact of policy and related obligations to be assessed on individual schemes and regeneration areas. Examples include:
- Major Development Group
 - Regeneration Group
 - S106 Working Group

Table 5: Monitoring and Indicators

Policy	Responsible Agency	Indicator
ROM1: Romford Station Gateway	Transport for London, Crossrail and Network Rail.	Delivery of ROMSSA6 by 2020
ROM2: East London Transit	Transport for London	Implementation of East London Transit through Romford by 2020
ROM3: Brewery Bus Station	Transport for London Henderson Global Investors	Increase in number of bus services using station
ROM4: Pedestrian Links	Developers Transport for London London Borough of Havering	Proportion of journeys made be foot (Havering wide indicator)
ROM5: Cycle Routes	Developers Transport for London London Borough of Havering	Length of cycle routes completed Number of new cycle parking spaces provided
ROM6: Respecting the Historic Environment	London Borough of Havering English Heritage	Number of buildings of historical and/or architectural interest
ROM7: Market Place	London Borough of Havering	Number of people attending events in Romford Market Place
ROM8: Day and Evening Economy	Havering Community Safety Partnership / Metropolitan Police	Street Crime Rate
ROM9: Romford Retail Policy	Private sector land and property owners, retailers, London Borough of Havering, Romford Town Centre Partnership	Amount of completed retail development in the town centre (Core Output Indicator 4b) Position of Romford in the London strategic town centre network Year-on-year yield trends for Romford Zone A rents (compared to other town centres)
ROM10: Retail Core	Private sector land and property owners, retailers, developers, London Borough of Havering, Romford Town Centre Partnership	Number of frontages in primary shopping areas where a group of more than three non-retail shop fronts exist
ROM11: Retail Fringe	Private sector land and property owners, retailers, developers, London Borough of Havering, Romford Town Centre Partnership	Diversity of uses in the retail fringe Proportion of vacant units in the retail fringe
ROM12: The Brewery	Private sector land and property owners, retailers, developers, London Borough of Havering, Henderson Global Investors, Romford Town Centre Partnership. Transport for London	Amount of completed retail development (comparison and convenience) Amount of completed leisure development

Policy	Responsible Agency	Indicator
ROM13: Romford Office Quarter	Private sector land and property owners, developers.	Amount of completed office development in the town centre (Core Output Indicator 4b)
ROM14: Housing Supply	Private sector land and property owners, developers and housing associations	Number of new homes completed each year Number of units of affordable housing completed
ROM15: Family Accommodation	Private sector land and property owners, developers and housing associations	Number of family homes completed
ROM16: Social Infrastructure	London Borough of Havering Private sector land and property owners and housing associations Havering PCT and NHS London Healthy Urban Development Unit	Number of section 106 agreements (and the total funds secured) related to infrastructure provision Completion of new LIFT funded Primary Care Centre
ROM 17: Greening Romford	Private sector land and property owners and housing associations	Area of public green space Number of trees planted
ROM18: River Rom	Private sector land and property owners and housing associations Environment Agency	Length (in metres) of restored and accessible river frontage
ROM19: Tall Buildings	Private sector land and property owners and housing associations	No indicator applicable
ROM20: Urban Design	Private sector land and property owners and housing associations	No indicator applicable
ROM21: Public Spaces	Private sector land and property owners and housing associations	Area of new public open space in hectares

12 Index of policies and site specific allocations

ROM1	ROMFORD STATION GATEWAY
ROM2	EAST LONDON TRANSIT
ROM3	BREWERY BUS STATION
ROM4	PEDESTRIAN LINKS
ROM5	CYCLE ROUTES
ROM6	RESPECTING THE HISTORIC ENVIRONMENT
ROM7	MARKET PLACE
ROM8	DAY AND EVENING ECONOMY
ROM9	ROMFORD: METROPOLITAN SHOPPING CENTRE
ROM10	RETAIL CORE
ROM11	RETAIL FRINGE
ROM12	THE BREWERY
ROM13	ROMFORD OFFICE QUARTER
ROM14	HOUSING SUPPLY
ROM15	FAMILY ACCOMODATION
ROM16	SOCIAL INFRASTRUCTURE
ROM17	GREENING ROMFORD
ROM18	RIVER ROM
ROM19	TALL BUILDINGS
ROM20	URBAN DESIGN
ROM21	PUBLIC SPACES
ROMSSA1	ANGEL WAY
ROMSSA2	BRIDGE CLOSE
ROMSSA3	COMO STREET
ROMSSA4	18-46 HIGH STREET
ROMSSA5	37-59 HIGH STREET
ROMSSA6	STATION GATEWAY AND INTERCHANGE

13 Glossary

Annual Monitoring Report	An annual report for the previous financial year which updates progress on producing the Local Development Framework (LDF) and assesses the performance of LDF policies.
Area Action Plan	A Development Plan Document that establishes a planning framework for areas of change or conservation.
Affordable Housing	Housing for people whose incomes are insufficient to allow them to afford decent local housing on the open market.
Air Quality Management Area (AQMA)	An area where an Action Plan is prepared to ensure that emission levels for prescribed pollutants are not exceeded.
Ambient Noise	Ongoing sounds in the environment such as that from industry and transport.
Biodiversity	The variety of all life forms (animals, plants and living things), the genes they contain and the ecosystems they form part of.
Building of Local Heritage Interest	A building or structure which, whilst not listed by the Secretary of State, the Council feels to be an important part of Havering's heritage due to its architectural, historic or archaeological significance.
Community Strategy	A document produced by a Local Strategic Partnership to promote or improve the economic, social and environmental wellbeing of the area under jurisdiction of a local authority.
Comparison Goods	Goods which people buy from the store offering the best value for money rather than the one closest to them. They include household appliances, furniture, clothing and footwear.
Convenience Goods	Goods which are commonly purchased everyday. They include food, drink, tobacco and newspapers.
Core Strategy	A Development Plan Document that sets out a long term spatial vision and spatial objectives and core policies to deliver the vision. Also includes detailed development control policies.
Crossrail	Crossrail is a proposed new rail link that will enable rail

travel from Romford across London.

Development Control Policies	Policies that contain criteria against which planning applications are assessed. Development Control Policies ensure that all development meets the vision and objectives of the core strategy.
Development Plan	Havering's Development Plan comprises the London Plan and all the Development Plan Documents contained within the Local Development Framework.
Havering Strategic Partnership / Local Strategic Partnership	A partnership which is focused and committed to improving the quality of life and governance in a particular locality. The partnership consists of people representing public services, local business, residents and community and voluntary groups.
Inclusive design	Seeks to create an environment which can be easily used by as many people as possible without undue effort, separation or special treatment. It enables everyone to have the ability to participate equally in the development's mainstream activities.
Independent Examination	A hearing chaired by an Independent Inspector to assess the soundness of development plan documents.
Local Development Framework (LDF)	The LDF forms part of Havering's Development Plan along with the London Plan. The LDF comprises Development Plan Documents, Supplementary Planning Documents, a Statement of Community Involvement and Annual Monitoring Report.
Local Development Documents	A collective term referred to in the Planning and Compulsory Purchase Act 2004, for Development Plan Documents, Supplementary Planning Documents and the Statement of Community Involvement.
Local Development Scheme	Sets out the detail, time scales and arrangements for producing all local development documents.
Local Implementation Plan	A statutory transport plan produced by each London borough which sets out how they will implement the Mayor's Transport Strategy in their area.
Mixed use development	Development containing a variety of activities and uses on single sites or across wider areas such as town centres.
National Planning Guidance	Sets out the Government's national policies and principles on planning which local planning policy must be consistent with. These take the form of Planning Policy Guidance

Notes and Planning Policy Statements.

Proposals Map	A map that shows the boundaries of all policy areas as set out in Development Plan Documents.
Public Transport Accessibility Levels (PTAL)	Public Transport Accessibility Levels are a highly detailed and accurate measure of the accessibility of a point to the public transport network, taking into account the walk access time and service availability.
Public Realm	The space between and within buildings that are publicly accessible.
Saved Policies	Unitary Development Plan policies that have been saved for a period of three years from September 2004. During the three year period, the saved policies will progressively be replaced by policies in local development documents.
Section 106 Agreements	Legally binding agreements between a local planning authority and land developers to secure planning objectives for the area and for the community. Agreements can be used for a variety of uses such as the requirement for the developer to provide affordable housing or undertake environmental improvements to a town centre.
Site Specific Allocations	A document which sets out sites for specific uses and development such as housing, jobs and community facilities which are necessary to deliver the Core Strategy of the LDF.
Social Infrastructure	Includes health, education, childcare, facilities for older people and disabled people, as well as libraries, community halls, meeting rooms and places of worships.
Stakeholders	Any person, group, or organisation affected by or having an interest in the development of planning policy.
Statement of Community Involvement	A document that sets out how a local planning authority intend to involve communities and stakeholders in the process of preparing local development documents and development control decisions.
Submission	This is the stage in preparing development plan documents when they are submitted to the Secretary of State for Independent Examination.
Supplementary Planning Documents (SPDs)	A document which further expands on information contained in policies in Development Plan Documents. The document may explain through text, illustrations and practical examples, how policies can be taken forward.

Sustainability Appraisal (SA)	A tool for assessing policies to ensure that they reflect sustainable development objectives, including environmental, social and economic factors. The Planning and Compulsory Purchase Act 2004, requires local planning authorities to undertake a sustainability appraisal of all local development documents.
Sustainable Development	Development that aims to ensure a better quality of life for everyone, now and in the future through the protection of the environment, social progress, the prudent use of natural resources and the maintenance of economic growth.
Town Centre Hierarchy	Categorises town centres depending on their function and the area they serve. Town centres may be defined as International, Metropolitan, Major, District and Local.
Use Classes Order	The Use Classes Order is a town planning tool which categorises everything from shops, services, industrial uses, hotels, dwellings, institutions and leisure uses into several classes. The Use Class Order effectively controls what buildings can be used as and what the use of buildings can be changed to.

Appendix 3

Romford Area Action Plan

Soundness tests

September 2007

Havering's Local
Development Framework

Soundness tests

1. The soundness tests fall into three categories: Procedural Tests, Conformity Tests, and Coherence, Consistency and Effectiveness Tests. The tests are as follows and a commentary is provided to illustrate how the Submission Romford Area Action Plan complies with these.

Procedural tests	
i. has been prepared in accordance with the local development scheme	The Romford Area Action Plan is identified in the Council's approved Local Development Scheme and has been prepared in line with the programme set out in it.
ii. has been prepared in compliance with the Statement of Community Involvement (SCI), or with the minimum requirements set out in the regulations where no SCI exists	Havering's Statement of Community Involvement (SCI) was adopted in February 2006. Consultation on the Romford Area Action Plan has been undertaken in line with the SCI.
iii. the plan and its policies have been subjected to sustainability appraisal	A Sustainability Appraisal has been carried out of the options, the preferred options and significant changes to these.
Conformity tests	
iv. it is a spatial plan which is consistent with national planning policy and in general conformity with the RSS for the region or the spatial development strategy if in London, and it has properly had regard to any other relevant plans, policies and strategies relating to the area or to adjoining areas	The Romford Area Action Plan takes into account the need to be consistent with national planning policy, the requirement to be in general conformity with the London Plan and to have regard to other relevant plans, policies and strategies relating to the area or to adjoining areas. This is clearly set out in Section 4 of the Submission Document.
v. it has had regard to the authority's community strategy	The vision and objectives of the Romford Area Action Plan are consistent with Havering Strategic Partnership's updated Community Strategy. This is shown in Section 6 of the Submission Document.
Coherence, consistency and effectiveness	
vi. the strategies / policies /	The Romford Area Action Plan is

<p>allocations in the plan are coherent and consistent within and between development plan documents prepared by the authority and by neighbouring authorities, where cross-boundary issues are relevant</p>	<p>consistent with the Core Strategy and Development Control Policies DPD and Site Specific Allocations DPD. There are no relevant cross-boundary issues.</p>
<p>vii. the strategies / policies / allocations represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are founded on a robust and credible evidence base</p>	<p>The evidence base was clearly presented as the context for the options consultation.</p>
<p>viii. there are clear mechanisms for implementation and monitoring</p>	<p>Section 11 of the Romford Area Action Plan covers the mechanisms for implementation and monitoring. Each Site Specific Allocation includes a dedicated Implementation section and the progress of each site allocation will be covered in the Annual Monitoring Report.</p>
<p>ix it is reasonably flexible to enable it to deal with changing circumstances</p>	<p>The Council intends to monitor the effectiveness of policies through its Annual Monitoring Report and make changes as necessary where the policy is not performing as intended.</p>



MEETING	DATE	ITEM
CABINET	19 September 2007	11

**Cabinet Member:
Cllr Ramsey**

**Relevant Overview & Scrutiny Committee:
Corporate**

REPORT OF THE CHIEF EXECUTIVE

SUBJECT: SOCIAL SERVICES BUDGET

SUMMARY

This report requests Members approval to enhance the social care budgets for adults in 2007/08 by way of a virement to meet current identified need.

RECOMMENDATION

Members:

- Agree the investment of £5 million in Adult Social Care in 2007/08 and the virement of this amount from identified service budgets
- Authorise the Chief Executive and Group Director Finance and Commercial to adjust the budgets accordingly within the overall approved budget.
- Authorise the Chief Executive and Group Director Finance and Commercial to reallocate any resources that become available to the priorities providing the investment, after consulting with the Leader and Lead Member Resources.

REPORT DETAIL

1. Earlier in the summer, the Council identified that the social services budget was struggling to meet the demands placed upon it. The combination of London's largest proportion of over 65's and a commitment to ongoing improvements in the service mean that this pressure on the budget will continue in the future. At the same time, Havering receives a low central government grant compared to many other London boroughs.
2. The current revenue monitor indicates that Adult Social Services requires an additional investment of £5m.
3. There are service pressures throughout adult social care due to the rising numbers of clients in need and the rising costs of social care. Over the last 18 months the numbers of older people receiving intensive support to remain in their homes has increased substantially. The numbers of clients receiving substantial direct payments in order to be able to choose their own care arrangements has also risen substantially.
4. These clients will need continuing support from the council and it is projected that client numbers, particularly in the elderly persons service area will continue to rise. Contract and placement costs continue to rise in line with national trends.
5. The adult social care service, along with services up and down the country is modernising, in order to adjust to the increased levels of need and to the Government priorities of allowing more choice for all categories of clients. For example, as an increasing number of clients choose to receive direct payments from the Council to allow them to arrange their own care, the Council needs to downsize its in-house services to adjust to this.
6. The service has an extensive programme of modernisation in hand both to make efficiencies in its service provision and to offer enhanced choice to clients. The kinds of services that are under review for modernisation are:
 - the way the Council provides home care services to allow more client choice
 - encouraging people to be more independent through direct payments
 - reviewing the quality of residential and day care services for all client groups
 - planning to commission a wider and more suitable choice of residential, nursing and extra care supported housing for all clients
 - working with the health services to offer more seamless services
 - ensuring increased value for money from all commissioned contracts
7. This represents a substantial work programme for the service. Enhanced capacity has been introduced into the service in order to speed up the modernisation

programme. At present Alan Adams and Eileen Means who are both ex- Directors of Social Services are currently assisting with this and it is anticipated that they will be with the Council throughout the autumn.

8. In setting the budget, the Council had regard to pressures in the Adult Social Services position.

A base £1m was held for amongst other things:

- Funding agreements with the PCT
- Transitional costs in relation to reprovisioning
- Adult Placement pressures

The contingency sum of £2m was set having regard to the capacity to meet in year budget pressures and a number of risks including:

- Demand led services
- Savings not being delivered
- Income problems

9. Following a root and branch review of the financial pressures facing adult social services, an increase to the service's budget is proposed. This will safeguard and improve the support provided to some of the most vulnerable people in the borough. Through careful management of the Council's overall finances, around £5 million will be added to the adult social care budget for this year.

10. This will be achieved by:

- a. Reviewing all services.
- b. Utilising the majority of the base provision.

This provides £5m which will be vired into the Social Services budget to provide this investment. Information in respect of this is attached in the appendix.

11. Our approach has been to ensure the Council proactively adopts a sustainable position, rather than delay a decision and simply react to developments, which would not help clients, staff or the strategic approach.
12. The Council will need to maintain an adequate level of budget for adult social care for future years, to reflect the cost of providing the service. However, the Council continues to modernise the service and now has a good platform to deliver a more cost-effective service in the future.
13. The Council will continue to maintain its overall financial stability by holding the contingency and maximising such things as interest generation. If the latter is positive and the former under-utilised, this will provide opportunities to reinvest in the areas currently supporting this investment. Priorities will be Children's Services and other areas that enhance the Council's overall service to the borough.

Financial Implications and Risks:

This investment is based on a projection and as such the projection may change, however it is based on the information currently known.

In order to maintain financial stability for the rest of the Council, the authority will continue to hold the contingency sum and not allocate against this. The contingency will be allocated as needed in the normal circumstances.

The budget process for 2008/09 has commenced and is focussing on identifying savings and efficiencies to offset pressures as well as provide investment.

The following risks have been identified:

- The budget increase is not required. This is highly unlikely but will be kept under review and resources reallocated to other priorities.
- The budget increase is still not sufficient – this is the best year-end projection and as mentioned the Council will still hold a reasonable contingency and will monitor and take further action as required.
- There are other favourable variations which arise which could be used for the investment instead of those identified – this will be kept under review and resources reallocated to other priorities as necessary.

Legal Implications and Risks:

Any virement in excess of £1 million within the overall Council budget requires a Cabinet decision and will be a key decision requiring notification in the Forward Plan or the exception procedure due to either general or special urgency.

Human Resource Implications and Risks:

Some of the investment is provided by delaying recruitment.

Equalities and Social Inclusion Implications and Risks:

None arising directly and this will be kept under constant review.

Reasons for the Decision:

The Council needs to ensure a balanced budget position and the financial procedure rules require action to be taken to ensure this is addressed.

Alternative Options Considered:

No action - which would affect the financial stability of the Council.

Staff Contact: Rita Greenwood

**Title: Group Director Finance and
Commercial**

Telephone: 01708 432218

**CHERYL COPPELL
Chief Executive**

Appendix

Details of in-year budget adjustments being made to facilitate the transfer of funds to adult social care

This appendix sets out the details of the in-year contributions being made by each directorate to ensure that an additional £5,000,000 can be invested in the adult social care budget.

The potential risks and impacts of **not** making this adjustment would be:

Vulnerable older people, people with disabilities and people who are mentally ill or with learning difficulties might not otherwise receive the services they need.

Finance and Commercial

Finance and Commercial are contributing £693,000 through the following measures:

- Holding Vacancies and generally applying recruitment drag
- Reduce fees with the Audit Commission
- Debt restructuring and subsidy review
- Delay in undertaking projects
- Freeze unallocated Health & Safety monies
- Increased income from Payroll contract

Potential impacts and risks

The main impact is the slowing down of projects such as the roll out of document imaging, desired improvements in the audit plan, contingency for as yet unidentified Health & Safety improvements and potential for a reduction in the service support available.

Assistant Chief Executives

HR is contributing £49,000 through deferring the computerisation of Occupational Health patient records, withdrawal of catering provision for in-house training courses, and re-profiling diversity expenditure into the following financial year.

Strategy and Communications are contributing £55k through not filling a vacant post and implementing next year's savings proposals this year.

Legal and Democratic Services are contributing £88,000. These arise from deferring some recruitment, appointments made at the bottom of scale, reduction in training budgets, some unfilled posts which are difficult to recruit to, and income from legal services for Section 106 Agreements.

Potential impacts and risks

Delays in recruitment and tight housekeeping required for the remainder of the year and potential for a reduction in service support available.

Sustainable Communities

Sustainable communities are contributing £410,000. These are made up of a combination of recruitment delay, application of Planning Delivery Grant together with capitalisation of a range of current revenue expenditure.

Potential risks and impacts

Whilst recruitment delay will cause some slowing of progress on projects it will not impact on the Council's key priorities.

Children's Services

Children's Services are contributing £740,000. The highest proportion comes from the non-filling of vacancies. The filling of some vacancies will be slowed down and other vacant posts not filled. Posts will continue to be filled where they are for social workers in the Child Protection teams, or are funded by grant where no saving accrues to the Council.

The main services which will be affected are: children with disabilities, the Leaving Care Service, the Education Welfare Service, and HIAS. It is unavoidable that, if posts remain vacant for a lengthy period, this will have some impact on service delivery and on performance.

In addition to vacancy control, the contribution will be made bringing forward some planned savings so the budget benefit is realised more quickly, e.g. Early Years Centres. It is anticipated that budget reductions will be made by work which has already begun in driving down unit costs. This combined with slowing of implementation of additional family support and Family Group Conferencing does carry some attendant risk of increasing numbers of LAC.

Potential Risks and Impacts

In summary, there are risks contained within this package of measures:

- that they will not prove financially achievable though management action will seek to ensure they are
- of service reduction directly to children
- on performance indicators
- of reversing recent trends and having increasing numbers of LAC
- of reversal of or significant delays in implementing the Directorate strategies, particularly in terms of preventative work

Public Realm

Public Realm is contributing £849,000. They include the use of a reserve on waste which is now longer identified as required, some slowing down of spend across the directorate, and some capitalisation of expenditure.

Potential Risks and Impacts

There is a risk of non delivery of some of these, should there be an exceptionally harsh winter. Tight housekeeping will be required throughout the directorate.

Corporate Contributions

In addition to the specific contributions listed above, further corporate contributions of £2,110,000 have been identified.

£500,000 has been contributed by slowing down expenditure on furniture and equipment. £200,000 contributed from interest accruing at a higher than anticipated rate, £800,000 from funds the special budget reserve, £350,000 has been contributed from unallocated LPSA grant, £260,000 has been contributed from windfall LABGI grant.

Potential Risks and Impacts

The corporate contributions made above reduce the Council's flexibility to allocate funds to any other emerging pressures within the budget.