

## **CABINET**

7.00 pm

Wednesday 17 September 2025 Council Chamber - Town Hall

Members 9: Quorum 3

Councillor Ray Morgon (Leader of the Council), Chairman

#### **Cabinet Member responsibility:**

Councillor Gillian Ford (Vice-Chair)

Lead Member for Adults & Wellbeing

Councillor Oscar Ford Lead Member for Children & Young People

Councillor Paul McGeary Lead Member for Housing & Property

Councillor Paul Middleton Lead Member for Digital, Transformation &

**Customer Services** 

Councillor Barry Mugglestone Lead Member for Environment

Councillor Natasha Summers Lead Member for Housing Need & Climate

Change

Councillor Christopher Wilkins Lead Member for Finance

Councillor Graham Williamson Lead Member for Regeneration

## Zena Smith Head of Committee and Election Services

For information about the meeting please contact:

Bernadette Lynch
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Please note that this meeting will be webcast.

Members of the public who do not wish to appear in the webcast will be able to sit in the balcony, which is not in camera range.

#### Cabinet, 17 September 2025

Please would all Members and officers attending ensure they sit in their allocated seats as this will enable correct identification of participants on the meeting webcast.

Under the Committee Procedure Rules within the Council's Constitution the Chairman of the meeting may exercise the powers conferred upon the Mayor in relation to the conduct of full Council meetings. As such, should any member of the public interrupt proceedings, the Chairman will warn the person concerned. If they continue to interrupt, the Chairman will order their removal from the meeting room and may adjourn the meeting while this takes place.

Excessive noise and talking should also be kept to a minimum whilst the meeting is in progress in order that the scheduled business may proceed as planned.

## Protocol for members of the public wishing to report on meetings of the London Borough of Havering

Members of the public are entitled to report on meetings of Council, Committees and Cabinet, except in circumstances where the public have been excluded as permitted by law.

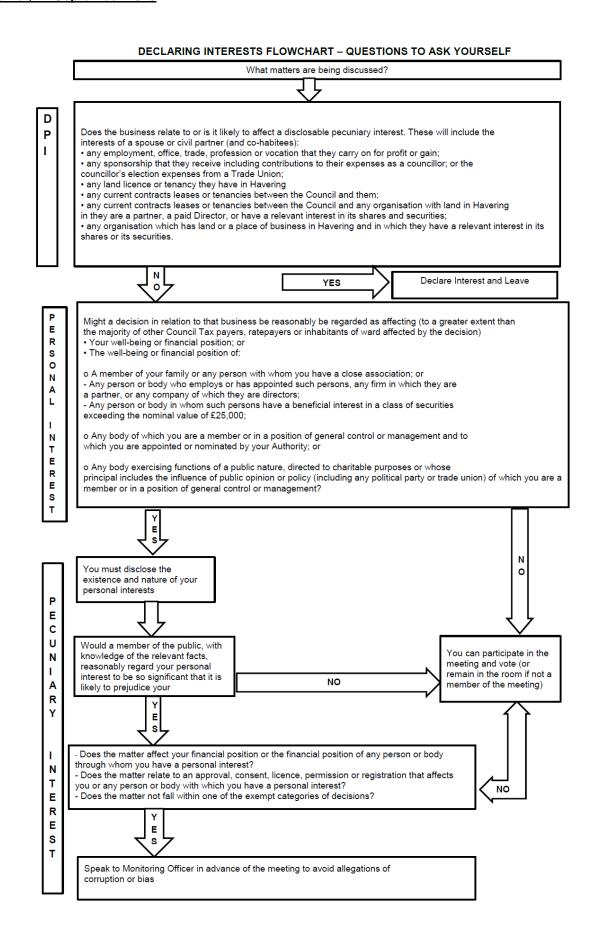
#### Reporting means:-

- filming, photographing or making an audio recording of the proceedings of the meeting;
- using any other means for enabling persons not present to see or hear proceedings at a meeting as it takes place or later; or
- reporting or providing commentary on proceedings at a meeting, orally or in writing, so
  that the report or commentary is available as the meeting takes place or later if the
  person is not present.

Anyone present at a meeting as it takes place is not permitted to carry out an oral commentary or report. This is to prevent the business of the meeting being disrupted.

Anyone attending a meeting is asked to advise Democratic Services staff on 01708 433076 that they wish to report on the meeting and how they wish to do so. This is to enable employees to guide anyone choosing to report on proceedings to an appropriate place from which to be able to report effectively.

Members of the public are asked to remain seated throughout the meeting as standing up and walking around could distract from the business in hand.



#### Principles of conduct in public office

In accordance with the provisions of the Localism Act 2011, when acting in the capacity of a Member, they are committed to behaving in a manner that is consistent with the following principles to achieve best value for the Borough's residents and to maintain public confidence in the Council.

**SELFLESSNESS**: Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

**INTEGRITY**: Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.

**OBJECTIVITY**: In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

**ACCOUNTABILITY**: Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

**OPENNESS**: Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

**HONESTY**: Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

**LEADERSHIP**: Holders of public office should promote and support these principles by leadership and example.

#### **AGENDA**

#### 1 ANNOUNCEMENTS

On behalf of the Chair, 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 DISCLOSURES OF INTEREST

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

#### **4 MINUTES** (Pages 9 - 16)

To approve as a correct record the minutes of the meeting held on 13<sup>th</sup> August 2025, and to authorise the Chair to sign them.

#### 5 ASBESTOS CONTROL POLICY (2025) (Pages 17 - 44)

Report attached.

## ADOPTION OF THE ROMFORD, RAINHAM AND GIDEA PARK CONSERVATION AREA APPRAISAL AND MANAGEMENT PLANS (Pages 45 - 256)

Report attached.

#### 7 HOUSING OMBUDSMAN ANNUAL REPORT (Pages 257 - 274)

Report attached.

#### **8 COMPLAINT POLICY** (Pages 275 - 308)

Report attached.

#### 9 Q1 CORPORATE PLAN PERFORMANCE REPORT (Pages 309 - 326)

Report attached.

#### 10 LAUNDERS LANE (ARNOLD'S FIELD) UPDATE (Pages 327 - 356)

Report attached.





## Public Document Pack Agenda Item 4



#### MINUTES OF A CABINET MEETING Council Chamber - Town Hall Wednesday, 13 August 2025 (7.00 - 8.06 pm)

#### Present:

Councillor Ray Morgon (Leader of the Council), Chairman

	Cabinet Member responsibility:
Councillor Gillian Ford (Vice-Chair)	Lead Member for Adults & Wellbeing
Councillor Oscar Ford	Lead Member for Children & Young People
Councillor Paul McGeary	Lead Member for Housing & Property
Councillor Paul Middleton	Lead Member for Digital, Transformation & Customer Services
Councillor Barry Mugglestone	Lead Member for Environment
Councillor Natasha Summers	Lead Member for Housing Need & Climate Change
Councillor Christopher Wilkins	Lead Member for Finance

Apologies received for the absence of Councillor Graham Williamson.

#### 1 **ANNOUNCEMENTS**

On behalf of the Chair, there was 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

Apologies received from Councillor Graham Williamson. Councillor Dilip Patel attended in place of Councillor Michael White, who is currently unwell. The Leader and Cabinet Members extended their best wishes for his recovery.

#### 3 DISCLOSURES OF INTEREST

There were no declarations of interest.

#### 4 MINUTES

The minutes of the meetings held on 11<sup>th</sup> June 2025, were agreed as a correct record and the Chair signed them.

## 5 PROCUREMENT OF FRAMEWORK AGREEMENT- FROZEN FOOD AND GROCERY

**Report Title:** Approval to award contracts for Frozen Foods and Groceries

**Presented by:** Councillor Oscar Ford, Cabinet Member for Children and Young People

#### **Summary:**

The current Frozen Foods and Groceries Single-supplier framework expires on 31 August 2025. The Council's current call-off contract expires on the same date.

HES Catering Service has reviewed the requirements and seeks to establish a new three year (plus 12-month extension) multi-supplier framework for this provision as soon as possible. The framework will be owned and managed by HES Catering Services and can be accessed by the members of the Procurement Across London (PAL) group. Each participating member is responsible for their respective call-off agreements and will enter into separate call-off contracts.

The Councils who form the PAL group are:

- London Borough of Havering,
- · London Borough of Tower Hamlets,
- London Borough of Waltham Forest,
- Thurrock Council

#### Cabinet:

#### **Approved** the award of:

- A. A Pan London multi-supplier framework agreement for the supply of Frozen Foods and Groceries with an estimated value of c. £8.36m in year 1, c.£36.04m total contract value over 3 plus 1-year term, commencing on 1st September 2025 until 31st August 2029.
- B. A Havering call-off to the estimated value of c. £2.49m in year 1 (£10.73m total estimated value over 3 plus 1-year term), commencing on 1st September 2025 until 31st August 2029.

The current PAL framework expires on 31st August 2025. The Council's current call-off contract expires on the same date.

The indicative value of the new call-off contract across PAL members is c. £8.36m in year 1. The total framework value over the 4-year term of the contract (3 years + 1-year extension) is £36.04m across all PAL members. This includes an estimated 5% annual inflationary increase.

Havering's estimated annual contract value is £2.49m in year 1 (£10.73m total contract value).

## 6 STARTING WELL IMPROVEMENT PLAN YEAR TWO MAY 2025 - MAY 2026

**Report Title:** Starting Well Improvement Plan Year Two May 2025 - May 2026

**Presented by:** Councillor Oscar Ford, Cabinet Member for Children and Young People

#### **Summary:**

Following Ofsted's inspection in December 2023 and the Statutory Improvement Notice in March 2024, the Starting Well directorate developed and implemented an improvement plan, which was submitted to Ofsted and the Department for Education (DfE) in May 2024.

One year on, the plan has been updated to reflect progress and sharpen priorities, informed by internal quality assurance activity and feedback from Ofsted and the DfE. Two Ofsted monitoring visits (October 2024 and March 2025) and two DfE reviews (November 2024 and June 2025) have acknowledged progress, while highlighting the need for accelerated pace of improvement. The revised plan focuses on strengthening management oversight, supervision, and quality assurance. The DfE welcomed the plan's clearer focus on outcomes.

Key developments include collaboration with the DfE Improvement Advisor, Sector-Led Improvement Partners (LB Islington and Centre for Systemic Social Work) to improve our case management system (LiquidLogic) and relaunch our systemic practice model with staff, as well as with partners. This work began in late 2024/25, with impact expected this financial year.

Workforce development remains central to the plan. The second phase of the Starting Well reorganisation concludes this autumn, with continued focus on recruitment, retention, training, and accredited systemic development. We are also advancing the use of Artificial Intelligence and technology to reduce administrative tasks and increase time spent undertaking direct work with families.

Progress continues to be overseen by the independently chaired Practice Improvement Board (meeting every eight weeks) and the quarterly Practice Improvement Oversight Board, chaired by the Chief Executive and attended by senior leaders, elected members, partners and DfE representatives.

The next Ofsted monitoring visit is expected in autumn 2025, followed by a third DfE review in late 2025.

#### Cabinet:

**Noted**, **endorsed** and **agreed to adopt** the content of the Starting Well Improvement Plan 2025/26.

## 7 PERMISSION TO RE-PROCURE A SEXUAL HEALTH E-SERVICE VIA THE LONDON SEXUAL HEALTH PROGRAMME

**Report Title:** Permission to Re-Procure a Sexual Health E-Service via the London Sexual Health Programme

Presented by: Councillor Gillian Ford, Cabinet Member for and Wellbeing

#### **Summary:**

This paper seeks permission from Cabinet to enter into a Memorandum of Understanding and subsequent Inter-Authority Agreement with the City of London Corporation to participate in the re-procurement process and subsequent contract for the provision of online services for sexual and reproductive health.

The Council intends to enter into a new five-year agreement via the London Sexual Health Programme led by the City of London Corporation, with an option to extend for up to four additional years (5+2+2). Havering's spend over the full nine-year term is estimated at £2.7 - £3.1 million, dependant on activity volumes and the optional service modules that the Council choses to activate (if any).

#### **Cabinet approved:**

- 1. Entering into a Memorandum of Understanding (MOU) in the form attached at Appendix 1 to participate in a multi-Borough procurement process for online services for sexual and reproductive health (eservice).
- 2. In principle **approve** entry into the subsequent contract for online services for sexual and reproductive health (e-service); and
- 3. **Delegated** authority to the Strategic Director of Resources to:

- finalise and enter into all associated documentation including the MOU and an Inter Authority Agreement (IAA) regulating use of the awarded contract.
- ii. agree any extension permitted under the terms of the IAA and contract
- 4. Noted the decision as to activation of the optional service modules for contraceptive and PrEP care during the term of the contract will be taken by the Director of Public Health acting within their existing financial delegations and authorities.

#### 8 WORKFORCE STRATEGY REFRESH 2025-2027

**Report Title:** Refreshed Corporate Workforce Strategy 2025-2027 and Beyond

Presented by: Councillor Ray Morgon, Leader of the Council

#### **Summary:**

This refreshed strategy builds on the foundations of the 2022–2025 Workforce Strategy and reflects Havering Council's continued commitment to becoming a modern, inclusive, and high-performing organisation. It is shaped by workforce feedback, legislative developments, and the Council's strategic priorities, and is designed to respond to the challenges and opportunities of the next three years.

The strategy is structured around five strategic people themes:

- 1. Organisational Design, Culture, Values and Behaviours
- 2. Leading Our Workforce
- 3. Developing Our Workforce
- 4. Treating Our Workforce Fairly with Kindness and Respect
- 5. Supporting Our Workforce

Each theme is underpinned by a detailed action plan, with clear milestones across three implementation phases:

- Year 3 (2025/26): Foundation and Initial Implementation
- Year 4 (2026/27): Implementation, Monitoring, and Continuous Improvement
- Year 5 (2027): Consolidation and Planning for the 2027–2030 Strategy

The refreshed strategy introduces a more dynamic and inclusive tone, celebrating the Council's 60th anniversary and reinforcing our ICARE values—Integrity, Care, Ambition, Respect, and Everyone. It encourages a

culture of accountability, ownership, and continuous improvement, while recognising the importance of wellbeing, equity, and innovation.

Key enhancements include:

- Expansion of the ICARE ambassador programme and annual recognition awards
- A strengthened 'Choose Havering' pledge, setting clear expectations for staff and leaders
- A refreshed PDR framework and mentoring programme
- New career pathways, succession planning, and apprenticeship opportunities
- A comprehensive EDI workforce plan and Total Reward Strategy
- Enhanced wellbeing support and HR transformation initiatives

Directorates and programme teams will be accountable for aligning their workforce plans with the strategy. Progress will be monitored through regular reporting, PDR alignment, and annual reviews. The strategy is a live document, designed to evolve in response to changing needs, financial pressures, and legislative developments.

#### Cabinet:

#### **Noted** and **Supports** the following:

- The implementation of all elements of the refreshed Corporate Workforce Strategy 2025–2027.
- The continued alignment of directorate and programme workforce plans with the strategic themes and action plans outlined in the strategy.
- The annual review and evolution of the strategy to ensure it remains responsive to organisational priorities, workforce feedback, and external developments.

#### 9 CORPORATE PLAN ANNUAL REPORT

Report Title: Corporate Plan Annual Performance Report 2024/25

Presented by: Councillor Ray Morgon, Leader of the Council

#### **Summary:**

This is the Councils third Annual Performance Report that enables a transparent review and scrutiny of the Council's overall performance for its residents.

It provides an overview of the outcomes of priorities and projects outlined in the corporate plan. It is essential that the Council monitor its performance regularly to ensure that it is meeting its strategic objectives and providing value for money.

#### Cabinet:

- 1. **Noted** the 2024/25 annual performance report
- 2. **Agreed** that the report will be published on the councils website

#### 10 **2024-26 1ST QUARTER REVENUE AND CAPITAL MONITORING**

**Report Title:** First Quarter of Financial Year 2025/26 Revenue and Capital Monitoring Report

**Presented by:** Councillor Chris Wilkins (Cabinet Member for Finance.)

#### **Summary:**

This report gives an overview of the Council's financial position setting out the forecast revenue expenditure as at the end of June 2025 with an explanation of the significant variances. It also provides an update on progress towards savings targets and an overview of the capital programme at the end of quarter one.

#### Cabinet:

- 2.1 **Noted** the revenue monitoring position of the Council as at the end of June 2025 (quarter one of the financial year.) This includes the position on the Council's General Fund (sections 4, 5 and 6), HRA (Section 8) and DSG budgets (section 9). The consequent impact on the Council's reserves is set out in section 10.
- 2.2 **Noted** that £11.3m of funding being held centrally will be transferred to Ageing Well (£7.6m) and Living Well (£3.7m) to meet the ongoing demographic pressures in these areas; Also, **noted** that over allocated growth funding of £0.6m in Starting Well and £1.25m in Environment will be transferred to the corporate budget to reduce the Council's exceptional financial support requirement. These changes will have no impact on the overall budget variance.
- 2.3 **Noted** the progress toward the delivery of savings as set out in the Council's MTFS as at the end of June 2025 (quarter one of the financial year) as set out in section 7
- 2.4 **Noted** the capital monitoring position of the Council as at the end of June 2025 (quarter one of the financial year) as set out in section 11
- 2.4 **Noted** the write-off of uncollectable NNDR debt approved by the Strategic Director of Resources as set out in paragraph as set out in section 12.

Chairman

Cabinet, 13 August 2025



Asbestos Control Policy (2025).
Councillor Paul McGeary, Cabinet Member for Housing & Property.
Paul Walker, Interim Director of Housing and Property.
Joe Agius, 01708 434046, joe.agius@havering.gov.uk
This policy sets out to clarify the Council's commitment to supporting its residents' health, safety and wellbeing, through addressing any detected presence of asbestos in its properties.
Any Council costs arising from this Policy will be paid for from existing budgets.
Yes.
Periodically.
Places Overview & Scrutiny Sub-Committee.

The subject matter of this report deals with the following Council Objectives

People - Supporting our residents to stay safe and well X
Place - A great place to live, work and enjoy X
Resources - Enabling a resident-focused and resilient Council

#### **SUMMARY**

Up until the 1990s, Asbestos was a product that was widely used in construction due to its excellent heat resistance and thermal properties. It was present in a variety of forms and uses, including but not limited to; asbestos cement; artex ceilings; soffits and facia boards, and pipe lagging.

However, asbestos was subsequently identified as a substance that can pose a significant risk to health, and is now classified as a human carcinogen.

This policy sets out to clarify the Council's commitment to supporting the health, safety and wellbeing of its residents, through undertaking the removal of any detected presence of asbestos in its properties.

In so doing, the Council will fulfil its legislative and regulatory obligations, whilst further protecting the health, safety and wellbeing of affected households.

#### **RECOMMENDATIONS**

#### That Cabinet:

1. Approve the Property and Housing Services Asbestos Policy (2025) as set out in **Appendix A** of this report.

#### REPORT DETAIL

- 1.1 This policy applies to all HRA properties, PSL properties and hostels owned or managed by the Council.
- 1.2 It defines that, in general, that all materials within Havering Council properties must be presumed to contain asbestos and treated accordingly unless, or until, strong evidence is provided to the contrary. However, properties built after 2001 can be reasonably expected to not contain any asbestos containing materials.
- 1.3 The policy clearly sets out the explicit duties and responsibilities of staff, management and contractors involved in the asbestos removal process.
- 1.4 No works which may disturb asbestos will be undertaken until a review of the management survey has taken place and, if necessary, a refurbishment and demolition survey has been completed.

#### **REASONS AND OPTIONS**

#### 2. REASONS FOR THE DECISION

2.1 This is a legislative and regulatory requirement, as set out in section 1.3 of the policy. Compliance is expected by the government and will be enforced by the Regulator of Social Housing.

#### 3. OTHER OPTIONS CONSIDERED

3.1 There are no other feasible options.

IMPLICATIONS AND RISKS

#### 4. FINANCIAL IMPLICATIONS AND RISKS

4.1 This policy update applies to Housing Revenue Account (HRA) and Private Sector Leasing (PSL) properties and hostels. The HRA and General Fund has budgets available for training, surveys and compliance inspections and remedial works that stem from compliance checks. Assurance has been provided that all implications within the Policy will be maintained within the relevant Council budgets.

#### 5. LEGAL IMPLICATIONS AND RISKS:

- 5.1 Landlords have a duty to address hazards in homes under the Housing Act 2004 and Environmental Protection Act 1990.
- 5.2 The policy aims to ensure the Council fulfils its statutory duty to ensure properties are safe and meet all relevant legal requirements, including those outlined in the Building Safety Act.

#### 6. Human Resources implications and risks

6.1 Recognising that well-trained staff are key to the successful delivery of this policy, all necessary training will be delivered during the staff induction process, with appropriate refresher courses delivered as and when required.

#### 7. Equalities implications and risks

- 7.1 The Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010 requires the Council, when exercising its functions, to have due regard to:
  - (i) the need to eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under the Equality Act 2010.
  - (ii) the need to advance equality of opportunity between persons who share protected characteristics and those who do not, and;
  - (iii) foster good relations between those who have protected characteristics and those who do not.

Note: 'Protected characteristics' are: age, sex, race, disability, sexual orientation, marriage and civil partnerships, religion or belief, pregnancy and maternity and gender reassignment.

- 7.2 The Council is committed to all of the above in the provision, procurement and commissioning of its services, and the employment of its workforce. In addition, the Council is also committed to improving the quality of life and wellbeing for all Havering residents in respect of socio-economics and health determinants.
- 7.3 An equalities impact assessment has been carried out and is attached as **Appendix 2** of this report.

#### 8. Health and Wellbeing implications and risks

- 8.1 Havering Council is committed to protecting and improving the health and wellbeing of its residents.
- 8.2 Addressing potential risk posed by exposure to asbestos in LBH properties is vital to ensure the safety of residents, employees and contractors. Adoption of the proposed Asbestos Control policy will support the effective assessment and management of these potential risks, therefore supporting efforts to protect health and wellbeing.
- 8.3 There are no health and wellbeing risks identified in relation to the recommendation to adopt this policy.

#### 9. Environmental and climate implications and risks

9.1 The safe removal and disposal of asbestos from our properties will help further improve the environment of the borough.

#### **BACKGROUND PAPERS**

Appendix A Asbestos Control policy (2025)
Appendix B Asbestos Control policy (2025) - EqHIA





# Property and Housing Services Asbestos Control Policy (2025)



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#### 1. Introduction

#### 1.1 Purpose of this policy

This policy sets the Council's (LBH) core principles for dealing with asbestos in its properties.

It sets out the key process in managing asbestos; including providing an appropriate matrix to assess risk, and relevant processes to manage surveys, re-surveys and incidents.

#### 1.2 Aim of this policy

Keeping residents safe from harm is paramount and this extends to managing any risk associated with asbestos to employees, residents, visitors, contractors and members of the public as far as reasonably practicable.

LBH acknowledges and accepts responsibility under the Health and Safety at Work Act 1974, and the Control of Asbestos Regulations (CAR) 2012 to identify and to safely manage Asbestos Containing Materials on our premises.

Approved codes of practice and guidance information published by the Health and Safety Executive will be taken as the adopted standard.

Accordingly, LBH will comply with all relevant legislation and regulations to help keep residents safe.

#### 1.3 Legal context of this policy

This policy operates in the context of the following legislation and Codes of Practice:

- The Landlord and Tenant Act 1985
- Health and Safety at Work Act 1974
- Control of Asbestos Regulations 2012
- Hazardous Waste (England and Wales) Regulations 2005
- The Management of Health and Safety Regulations 1999
- The Workplace (Health Safety and Welfare) Regulations 1992
- The Housing Act 2004
- The Defective Premises Act 1972
- Construction Design and Management Regulations 2015
- Reporting of Injuries, Disease and Dangerous Occurrences Regulations 2013
- L143 Managing and working with asbestos (2013)
- HSG 264 Asbestos: The Survey Guide (2012)
- HSG 247 Asbestos: The licensed asbestos contractor's guide (2006)
- HSG 227 A comprehensive guide to managing asbestos in premises.

## 2. Background

Asbestos is a product which was widely used in construction up until the 1990s, noted for its excellent heat resistance and thermal properties. Asbestos can be found in a variety of forms and uses, including, but not limited to, asbestos cement, Artex ceilings, soffits and facia boards and pipe lagging.

Asbestos has been identified as a substance that can pose a significant risk to health, and is classified as a human carcinogen. When asbestos containing materials are damaged or disturbed, fibres can be released into the air and surrounding environment. The inhalation of these fibres can lead to a number of chronic and potentially fatal diseases of the lung, with those exposed to high concentrations of these fibres for a long period of time (for example, due to occupational exposure) being at greatest risk.

## 3. Principles

#### 3.1 General

- All materials within LBH properties must be presumed to contain asbestos and treated accordingly unless, or until, appropriate evidence is provided to the contrary, except;
- Properties built after 2001 can be reasonably expected to not contain any asbestos containing materials.

#### 3.2 HRA Properties

- A full asbestos risk register will be kept for all HRA assets.
- As per Regulation 4 of the Asbestos Regulations all communal areas will require a Management Level Survey.
- As per the Health & Safety at Work Act, which requires all workplaces to be safe for employees, all domestic properties will require a management level survey.
- All garages, stores, outbuilding and sheds will have a management level survey.
- For domestic properties, garages, sheds and outhouses which are of a similar archetype, age and condition cloned data can be used ahead of obtaining a full survey.
- All non-dwelling properties where asbestos is present will be re-inspected, as per the risk assessment but as a minimum every three years.

#### 3.3 PSL Properties

 LBH will ensure the landlord provides a management level asbestos survey prior to LBH taking the property.

#### 3.4 Hostels

 We will ensure management-level surveys are undertaken for all hostels owned and managed by LBH.

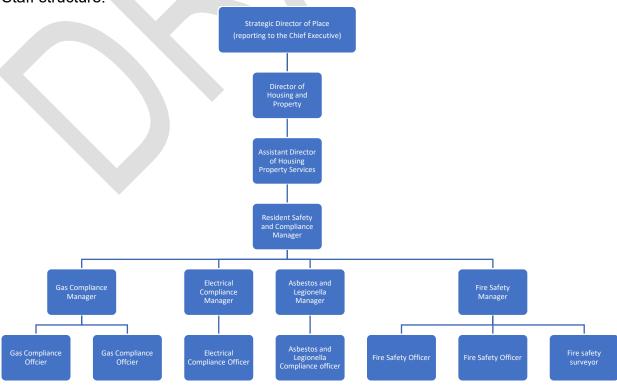
#### 3.5 Works

 No works which may disturb asbestos will be undertaken until a review of the management survey has taken place and where necessary a refurbishment and demolition survey completed and appropriate measure put in place.

## 4. Responsibilities

Duty Holder: Appointed Person: Responsible Person: Chief Executive, London Borough of Havering Assistant Director – Property Housing and Assets Asbestos and Legionella Compliance Manager

#### Staff structure:



## 5. Explicit Duties

Regulation 4 of The Control of Asbestos Regulations identifies the duty to manage asbestos in the common areas of our properties. It requires the duty holder (directly or delegated) to:

 Take reasonable steps to find out if there are materials containing asbestos in non-domestic premises, and if so, its amount, where it is and what condition it is in.

In order to manage the risk from asbestos in non-domestic premises, the dutyholder must ensure that a suitable and sufficient assessment is carried out as to whether asbestos is or is liable to be present in the premises.

In making the assessment, the duty holder will:

- Take into account any steps as are reasonable in the circumstances;
- Consider the condition of any asbestos which is, or has been assumed to be, present in the premises;
- Take into account any building plans or other relevant information and the age of the premises, and
- Inspect those parts of the premises that are reasonably accessible.

The duty holder will ensure that the assessment is reviewed without delay if:

- There is reason to suspect that the assessment is no longer valid, or
- There has been a significant change in the premises to which the assessment relates.

The duty holder will ensure that the conclusions of every assessment is recorded, and:

- Presume materials contain asbestos unless there is appropriate evidence that they do not;
- Make, and keep up-to-date, a record of the location and condition of the asbestos- containing materials - or materials that are presumed to contain asbestos.
- Assess the risk of anyone being exposed to fibres from the materials identified.

Where the assessment shows that asbestos is or is liable to be present in any part of the premises, the duty holder will ensure that:

- A determination of the risk from that asbestos is made;
- A written plan identifying those parts of the premises concerned is prepared; and
- The measures that are to be taken for managing the risk are specified in a written plan.

The measures to be specified in the plan for managing the risk must include adequate measures for:

- Monitoring the condition of any asbestos or any substance containing or suspected of containing asbestos;
- Ensuring any asbestos or any such substance is properly maintained or where necessary safely removed.

Information about the location and condition of any asbestos or any such substance will be provided to every person liable to disturb it and made available to the emergency services, that is:

- Prepare a plan that sets out in detail how the risks from these materials will be managed.
- Take the necessary steps to put the plan into action.
- Periodically review and monitor the plan and the arrangements to act on it so that the plan remains relevant and up-to-date.
- Provide information on the location and condition of the materials to anyone who is liable to work on or disturb them.

The Health and Safety at Work Act states the general duties of every employer to their employees:

- It shall be the duty of every employer to ensure, as far as is reasonably practicable, the health, safety and welfare at work of all his employees;
- Without prejudice to the generality of an employer's duty under the preceding subsection, the matters to which that duty extends include in particular;
  - the provision and maintenance of plant and systems of work that are, so far as is reasonably practicable, safe and without risks to health:

- the provision of such information, instruction, training and supervision as is necessary to ensure, so far as is reasonably practicable, the health and safety at work of his employees;
- insofar as is reasonably practicable as regards any place of work under the employer's control, the maintenance of it in a condition that is safe and without risks to health and the provision and maintenance of means of access to and egress from it that are safe and without such risks:
- the provision and maintenance of a working environment for their employees that is, so far as is reasonably practicable, safe, within regulations.

#### 6. Stakeholders

#### 6.1 Residents and Leaseholders

The White paper highlighted the need to engage residents in the safety of buildings and treat them as partners, both to seek their views and opinions but also to ensure they understand their duties.

Therefore, LBH will:

- Make compliance data available to residents on request;
- Ensure engagement is embedded in our core service offer both during works programmes and under normal circumstances;
- Ensure residents are involved in decisions around health and safety works to their homes;
- Ensure complaints are dealt with fairly and transparently;
- Ensure all residents are made aware of relevant strategies, LBH responsibilities and residents responsibilities at the time of sign up, and
- Ensure residents are aware of how to raise concerns or issue with health and safety within their buildings.

#### 6.2 Regulator of Social Housing

As a provider of Social Housing LBH is accountable to the Regulator for Social Housing who take a co-regulation approach to ensuring providers meet economic and consumer standards, explicitly that contained in the home standard.

Registered providers shall meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes.

The Director of Housing & Property will be responsible for managing a proactive relationship with the Regulator and to ensure all standards are met.

#### 6.3 Councillors

The Regulator for Social Housing stated in its review of the Consumer standards in 2019 that;

- Boards and Councillors are responsible for ensuring registered providers meet the consumer standards; this is a fundamental part of the registered providers commitment to co-regulation.
- Registered providers should have the systems and processes in place to provide assurance to their Boards and/or the Council that the standards are being met.
- Actions plans for achieving compliance will be shared with the Council, as appropriate.

## 7. Surveys

All surveys will be conduction in accordance with HSE guidance 264 Asbestos: The Survey Guide and will be undertaken by qualified UKAS-accredited asbestos surveyors.

Surveys fall into three principle types;

- i. Managements surveys that locate, as far as is reasonably practical, the presence and extent of asbestos containing materials in a property which could be damaged or disturbed by normal occupancy and to assess their condition. This is the principle survey used to populate the asbestos register.
- ii. **Refurbishment and Demolition surveys**, which are required before any work is carried out which cannot be undertaken using controlled measures and is used to determine the extent and scope of any asbestos removal or remediation works required before works.
- iii. **Re-inspection surveys** which re-inspect management surveys and monitor the condition of any identified asbestos containing materials.

When a resident requests a copy of the asbestos information held on their homes, LBH will provide this within 28 days. This may be for general information, or to support an application for landlord consent to undertake works.

At each void property. LBH will leave a copy of the asbestos management survey as part of the welcome pack, this will include appropriate advice on managing asbestos and what to do in the event of an incident.

## 8. Data Storage & Sharing

All asbestos information will be held on a centrally available asbestos register, which clearly identifies the property, the asbestos information held, the risk rating for that property and links to the full asbestos survey. This information will be shared with staff, operatives and contractors who are likely to visit and/or undertake any works to those properties.

Information will be shared with tenants when applying for landlord's consent to undertake works to their properties, should LBH hold relevant information. Where practicable contractors should be given direct access into the database and be allowed to access the information themselves.

All new surveys or asbestos information will be uploaded onto the database and the risk rating amended accordingly.

An audit trail of changes to the database will be available.

## 9. Staff training

Recognising that well-trained staff are key to the successful delivery of this policy, it will be covered in inductions for new officers and "refreshers" will be mandatory for current staff.

## 10. Equal Opportunities Statement

#### 10.1 Public Sector Equality Duty (PSED)

The Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010 requires all councils, when exercising its functions, to have 'due regard' to:

- i) The need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- ii) The need to advance equality of opportunity between persons who share protected characteristics and those who do not, and;
- iii) Foster good relations between those who have protected characteristic and those who do not.

Note: 'Protected characteristics' are age, sex, race, disability, sexual orientation, marriage and civil partnerships, religion or belief, pregnancy and maternity and gender reassignment.

LBH is committed to all of the above in the provision, procurement and commissioning of its services, and the employment of its workforce. In addition, LBH is committed to improving the quality of life and wellbeing for all Havering residents in respect of socio-economics and health determinants.

#### 10.2 EqHIA

An EqHIA (Equality and Health Impact Assessment) has been carried out and accompanies this policy.

LBH seeks to ensure equality, inclusion, and dignity for all in all situations. It will seek to ensure that this policy is, at all times, implemented in a manner that is fair to all sections of the local community.

All applicants for housing or re-housing will be invited to indicate if they wish to make use of the Council's translation and interpretation services, or if they require additional services to enable them to access and understand the policy to ensure that they are not disadvantaged in any way.

They also will be invited to provide details of ethnic origin, sexuality, disability and other equalities information. Provision of this information is not obligatory or a requirement for acceptance of an application.

However, such information will help monitor the number and types of protected characteristics requiring hostel support, and will help ensure that service improvement evolves in line with any changing local needs.

#### 10.3 Our Commitment

This policy will be regularly reviewed ensure it is not operated in any way that could discriminate or disadvantage against any particular group of people.

All information provided will be kept confidential and treated with respect at all times.

#### 11. Data Protection Statement

LBH takes personal privacy matters very seriously and will never share the individual's personal data without their prior knowledge, unless required to do so by law.

For full details about how LBH protects personal data, please visit <u>Havering</u> Council Data Protection policy.

## 12. Dissemination and communication of this policy

Housing Services will consult with all affected stakeholders, directly or indirectly, to ensure this policy fulfils its purpose to be clear and transparent.

This policy will be made available internally and externally in hard copy and electronic versions, as well as various formats – such as easy read, multi-lingual, braille and audio - upon request.

## 13. Implementation of this strategy

This policy will take effect from September, 2025.

Responsibility for the successful implementation of this policy will be with Havering Council's Assistant Director of Property and Housing Services.

## 14. Monitoring and review of this policy

This policy will be reviewed every year, or when any significant change in relevant legislation or best practice guidelines take place.

# 15. Delegated authority to make minor changes to this policy

The Assistant Director of Property Housing and Assets, in consultation with the Director of Housing and Property, will be able to approve minor amendments; i.e. amendments that do not significantly change this policy or associated procedures.



## Property and Housing Services Asbestos Control Policy (2025)

## **Equality and Health Impact Assessment (EqHIA)**

#### **Document control**

Title of activity:	Asbestos Control Policy (2025)	
Lead officer:	Ian Saxby - Assistant Director Property Housing & Assets	
Approved by:	Paul Walker - Director of Property and Housing	
Author:	Joe Agius, Housing Policy and Strategy Officer	
Date completed:	July 2025	
Scheduled date for review:	July 2028	

Did you seek advice from the Corporate Policy & Diversity team?	NO
Did you seek advice from the Public Health team?	NO
Does the EqHIA contain any confidential or exempt information that would prevent you publishing it on the Council's website?	NO

## **Equality & Health Impact Assessment checklist**

About your activity

ADC	About your activity		
1	Type of activity	Policy.	
2	Who will be affected by this activity	Havering Council property occupiers (tenants, leaseholders), Housing Services staff and management.	
3	Scope of activity	This policy applies to all LBH tenants and leaseholders, LBH staff and LBH appointed contractors.  The scope of this policy extends to properties owned or managed by LBH.	
4	Is this a new document for EqHIA approval?	YES.	
5	Does this document have the potential to impact upon people with protected characteristics as detailed herein?	YES.	
6	Does this document have the potential to impact upon affected people's health and wellbeing as detailed herein?	YES.	

Completed by:	Joe Agius, Housing Policy and Strategy Officer.
Date:	July 2025.

1. Age						
Please tick (🗸) the relevant box:		Overall impact: Positive  This policy does not discriminate.				
Positive	~	It will help further protect and improve the health, safety and wellbeing				
Neutral		of members of this protected characteristic group. Thus, the overall impact of this policy on the basis of age has been assessed as				
Negative		positive.				

Asbestos is especially dangerous to children and older adults due to their unique vulnerabilities:

Children are at higher risk due to the following reasons;

- **Developing lungs**: Children's respiratory systems are still maturing, making them more susceptible to damage from inhaled fibres.
- **Faster breathing rate**: They inhale more air per body weight than adults, increasing exposure to airborne asbestos.
- **Behavioural exposure**: Kids often play in dusty environments or touch contaminated surfaces, then put their hands in their mouths, raising the risk of ingestion.
- Longer latency window: Diseases like mesothelioma can take decades to develop. Exposure at a young age means more time for illness to manifest.

### In older adults:

- **Weakened immune systems**: Aging bodies may struggle to repair damage caused by asbestos fibres.
- **Cumulative exposure**: Older individuals may have had prolonged exposure over their lifetimes, especially if they worked in construction or buildings where Asbestos has been present.
- Higher incidence of asbestos-related diseases: Conditions like asbestosis, lung cancer, and mesothelioma are more common in older populations due to long-term fibre retention.

UK public health data reports that more than 5,000 asbestos-related deaths occur annually, with mesothelioma disproportionately affecting older adults.

2. Disability					
Please tick (✓) the relevant box:		Overall impact: Positive  This policy does not discriminate.			
Positive	>	It will help further protect and improve the Health and Safety of members of this protected characteristic group. Thus, the overall impact of this			
Neutral		policy on the basis of disability has been assessed as <b>positive</b> .			
Negative					

While there is limited direct research specifically isolating the effects of Asbestos on disabled people, these are confirmed reasons why disabled people may be more vulnerable:

- Pre-existing respiratory conditions (like muscular dystrophy or spinal cord injuries affecting lung function) can make asbestos exposure more dangerous.
- Reduced mobility may lead to longer exposure in contaminated environments, especially in older buildings with asbestos-containing materials.
- Socioeconomic factors often intersect with disability, increasing the likelihood of living in poorly maintained housing where asbestos risks are higher.
- Conditions like asbestosis can lead to progressive respiratory failure, which may compound existing disabilities.
- People with disabilities may face barriers to early diagnosis or treatment, making asbestos-related diseases harder to manage.

3. Sex/gender				
Please tick (✓) the relevant box:		Overall impact: Positive		
Positive	~	This policy does not discriminate.		
Neutral		It will help further protect and improve the Health and Safety of members of this protected characteristic group. Thus, the overall impact of this policy on the basis of sex/gender has been assessed as <b>positive.</b>		
Negative				

There is growing evidence that asbestos inhalation affects men and women differently, not just in terms of exposure routes but also in disease patterns and diagnosis.

Mesothelioma latency (time from exposure to disease) tends to be longer in women, possibly due to lower exposure levels.

Men still account for the majority of mesothelioma cases (about 83%), but female cases are rising faster, a 93% increase between 1993 and 2018 compared to 47% in men.

Females often have unknown exposure histories, making diagnosis more difficult, and are more likely to experience secondary or environmental exposure, such as:

- Handling contaminated clothing from family members.
- Working in buildings (schools, hospitals, offices) where asbestos remains in walls, ceilings, or insulation.

4. Ethnicity/race				
Please tick (✓) the relevant box:		Overall impact: Positive		
Positive	~	This policy does not discriminate.		
Neutral		It will help further protect and improve the Health and Safety of members of this protected characteristic group. Thus, the overall		
Negative	impact of this policy on the basis of ethnicity/race has been assessed as <b>positive</b> .			

### Evidence:

There is evidence suggesting that asbestos inhalation affects different racial and ethnic groups in distinct ways, but the differences are largely driven by occupational exposure, geographic location, and systemic disparities - not biological susceptibility.

For example, US studies have concluded that:

- White and Hispanic men have historically had higher rates of mesothelioma due to overrepresentation in high-risk jobs like construction, while
- Black and Asian men tend to have lower rates of mesothelioma, likely because they were less represented in these occupations during peak asbestos use.

Geographic clustering also plays a role, and regular/constant exposure - or living near – to asbestos increases risk regardless of race.

While genetic susceptibility may play a role in who develops asbestos-related diseases, current research suggests environmental and occupational factors are far more influential. However, there is no strong evidence that biological race affects how asbestos impacts the body.

5. Religion/faith				
Please tick (✓) the relevant box:		Overall impact: Positive		
Positive 🗸		This policy does not discriminate.		
Neutral		It will help further protect and improve the Health and Safety of members of this protected characteristic group.		
Negative		Thus, the overall impact of this policy on the basis of religion/faith has been assessed as <b>positive</b> .		

### Evidence:

There is currently no scientific evidence suggesting that asbestos inhalation affects people differently based on their religion or faith.

Asbestos-related diseases—like mesothelioma, asbestosis, and lung cancer—are caused by physical exposure to asbestos fibres, and not by any spiritual, cultural, or religious factors.

That said, religion and faith can intersect with asbestos exposure in indirect but important ways:

- Places of worship built before asbestos bans (e.g. churches, mosques, temples) may still contain asbestos in insulation, ceiling tiles, or roofing.
- Volunteers, clergy, or maintenance staff working in these buildings could be exposed during renovations or repairs.

Religious beliefs may shape attitudes toward medical treatment, which can affect how quickly someone seeks help for asbestos-related symptoms. In some cases, faith-based organisations provide healthcare or housing in older buildings, potentially increasing exposure risk if asbestos is present.

6. Sexual orientation				
Please tick (✓) the relevant box:		Overall impact: Positive		
Positive	~	This policy does not discriminate.  It will help further protect and improve the Health and Safety of members of this protected characteristic group. Thus, the overall		
Neutral				
Negative		impact of this policy on the basis of sexual orientation has been assessed as <b>positive</b> .		

There is no scientific evidence that asbestos inhalation affects people differently based on their sexual orientation.

The health risks like mesothelioma, asbestosis, and lung cancer, are caused by physical exposure to asbestos fibres, and not by someone's identity or orientation.

7. Gender reassignment					
Please tick (✓) the relevant box:		Overall impact: Positive			
Positive	~	This policy does not discriminate.			
Neutral		It will help further protect and improve the Health and Safety of members of this protected characteristic group. Thus, the overall			
Negative		impact of this policy on the basis of gender reassignment has been assessed as <b>positive</b> .			

### Evidence:

There is no scientific evidence that asbestos inhalation affects people differently based on their gender reassignment.

The health risks like mesothelioma, asbestosis, and lung cancer are caused by physical exposure to asbestos fibres, and not by someone's identity or orientation.

8. Marriage/civil partnership				
Please tick (✓) the relevant box:		Overall impact: Positive		
Positive 🗸		This policy does not discriminate.		
Neutral		It will help further protect and improve the Health and Safety of members of this protected characteristic group. Thus, the overall		
Negative		impact of this policy on the basis of marriage/civil partnership has been assessed as <b>positive</b> .		

There is no scientific evidence that asbestos inhalation affects people differently based on their marital/civil partnership status.

The health risks like mesothelioma, asbestosis, and lung cancer are caused by physical exposure to asbestos fibres, and not by someone's marital status.

9. Pregnancy, maternity and paternity					
Please tick (✓) the relevant box:		Overall impact: Positive			
Positive 🗸		This policy does not discriminate.			
Neutral		It will help further protect and improve the Health and Safety of members of this protected characteristic group. Thus, the overall			
Negative impact of this policy on the basis of pregnancy, maternity a has been assessed as <b>positive</b> .		impact of this policy on the basis of pregnancy, maternity and paternity has been assessed as <b>positive</b> .			

### Evidence:

There is no scientific evidence that asbestos inhalation affects people differently based on their maternity or paternity status. The health risks like mesothelioma, asbestosis, and lung cancer, are caused by physical exposure to asbestos fibres, and not by someone's identity or orientation.

Asbestos exposure during pregnancy, on the other hand, is a serious concern, though the direct risk to the unborn child is considered low.

Most studies suggest asbestos fibres are unlikely to cross the placenta or contaminate breast milk.

Still, the potential indirect effects on both the mother and foetus make it important to avoid exposure entirely.

Health & Wellbeing						
Please tick (✓) the relevant box:		Overall impact: Positive				
Positive	~	The Council is committed to the health, safety and well-being of Havering's residents. This policy does not discriminate.				
Neutral		will help further protect and improve the Health, Safety and wellbeing				
		of all directly and directly (i.e. visitors, neighbours, etc) affected is protected characteristic group. Thus, the overall impact of this policy of the basis of age has been assessed as <b>positive</b> .				
Negative						
		Do you consider that a more in-depth Health Impact Assessment is required as a result of this brief assessment? No ✓				

Asbestos exposure can have devastating effects on human health and wellbeing, especially when fibres are inhaled over time.

In the UK, over 5,000 deaths were attributed to asbestos-related diseases in 2024.

Major risks from prolonged exposure include:

- **Mesothelioma**: A rare and aggressive cancer affecting the lining of the lungs or abdomen. It is almost exclusively caused by asbestos exposure and is often fatal.
- Asbestosis: A chronic lung disease caused by scarring from asbestos fibres.
   It leads to shortness of breath, fatigue, and chest pain, and can be fatal in severe cases.
- **Lung Cancer**: Asbestos-related lung cancer looks similar to smoking-related cancer. The risk is significantly higher for smokers exposed to asbestos.
- **Pleural Thickening**: Swelling and thickening of the lung lining, which can cause breathing difficulties and chest discomfort.

Even short-term exposure can be harmful, there is no known 'safe' level.

### **Review**

This EqHIA will be reviewed in July 2028, or beforehand if:

- New, applicable legislation/regulation comes into effect, or
- New, relevant data becomes available.





CABINET

**Subject Heading:** 

**Cabinet Member:** 

**ELT Lead:** 

Report Author and contact details:

Policy context:

Financial summary:

Is this a Key Decision?

When should this matter be reviewed?

**Reviewing OSC:** 

Adoption of Conservation Area Appraisals and Management Plans for Romford, Rainham, and Gidea Park

Councillor Graham Williamson

Helen Oakerbee

Cara Collier, Senior Planning Policy Officer, cara.collier@havering.gov.uk

Havering Local Plan 2021

National Planning Policy Framework 2024

None

Yes -

(c) Significant effect on two or more Wards

n/a

Places Overview and Scrutiny Sub Committee

The subject matter of this report deals with the following Council Objectives

People - Supporting our residents to stay safe and well Place - A great place to live, work and enjoy **X** Resources - Enabling a resident-focused and resilient Council

### SUMMARY

This report seeks approval to adopt and publish Conservation Area Appraisal and Management Plans (CAAMPs) for Romford, Rainham and Gidea Park. Draft CAAMPs were consulted on earlier this year, comments have been incorporated, and final CAAMPs are now ready for adoption.

### RECOMMENDATIONS

- 1. Cabinet is recommended to adopt and publish the Conservation Area Appraisal and Management Plans for Romford, Rainham, and Gidea Park (attached as appendix 1, 2 and 3)
- Cabinet is recommended to delegate authority to the Director of Planning and Public Protection for adoption of future CAAMPs, if there are no boundary changes proposed.

### REPORT DETAIL

- 1.1 Conservation Areas (CAs) are areas which have been designated because of their special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. The Planning (Listed Buildings and Conservation Areas) Act 1990 requires Local Planning Authorities to designate areas which they are considered to be of architectural and historic interest as conservation areas. Section 71 of the Act requires the Local Planning Authority to formulate and publish proposals for the preservation and enhancement of these areas, and requires proposals to be submitted for consideration in a public meeting in the area to which they relate.
- 1.2 The Local Planning Authority has a legal duty to review and manage conservation areas. This includes review and updating of CAAMPs as required under the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 69 (2) states "It shall be the duty of a Local Planning Authority from time to time to review the past exercise of functions under this section and to determine whether any parts or any further parts of their area should be designated as conservation areas; and, if they so determine, they shall designate those parts accordingly."
- 1.3 The CAAMPs play a crucial role in informing planning decisions and assists the Local Planning Authority in assessing the impact of proposed developments on the

character of the conservation area. Conservation Area Appraisals and Management Plans (CAAMPs) for Romford, Rainham, and Gidea Park were last updated in 2008 and are considerably out of date. In view of this, it is of critical importance that the CAAMPs are up to date to ensure these areas are protected sufficiently.

- 1.4 Heritage consultants Purcell have been working to update the CAAMPs for Romford, Rainham and Gidea Park for the Council. Public consultation on the draft CAAMPs was held from 28<sup>th</sup> April to 9<sup>th</sup> June 2025. During the consultation, three in-person consultation events were held. For full details of the consultation, please see the Consultation Statement (Appendix 4), which sets out detail of the consultation undertaken, comments received, and changes made.
- 1.5 The CAAMPs are attached as appendices 1, 2 and 3. Each CAAMP summarises the area's special interest and historic development. It then goes onto the character assessment which explores key buildings in the area, important views, setting of the conservation area, etc. Issues and opportunities facing the CA are then presented, and finally how to manage change in the CA and specific recommendations for its protection. During the review process, boundary changes for all three CAs were recommended by our heritage consultants. These changes were consulted on and are reflected in the final CAAMPs. The changes to the conservation area boundaries are shown in Appendix 5.
- 1.6 Romford's boundary will expand significantly in the new CAAMP. An expansion was previously suggested in the 2008 Romford character appraisal but never implemented. Romford's current CA boundary is concentrated around Market Place and St Edwards Church, also spreading out along High Street and part of South Street, covering the facades of buildings. The approach of only protecting facades is no longer recommended by Historic England and is why expansion was suggested previously in 2008. Romford's new CA boundary reflects this. It also now extends further along South Street to Romford station. The new Romford CAAMP (appendix 1) reflects the changes in the area since the last appraisal was done (2008), and the ongoing challenges the conservation area faces. Section 6 'managing change' provides detailed guidance for the Council and developers on how to manage change in Romford while protecting it's historic character.
- 1.7 For Rainham, an expansion is proposed to include the whole garden area at Rainham Hall, which the boundary previously cut across. A small area in the North of the CA is proposed to be removed from the conservation area after a thorough site assessment finding the buildings in this area incongruous with the overall character of Rainham. Please see appendix 5 for the details of the boundary changes. Rainham CAAMP (appendix 2) reflects the changes in the area since the last appraisal was done (2008), and the challenges the conservation area faces. Section 6 'managing change' provides detailed guidance for the Council and developers on how to manage change in Rainham while protecting it's historic character.
- 1.8 A small expansion of the Gidea Park CA is proposed to include the Interwar parade of shops with flats above at 142-156 Balgores Lane, to more effectively

### Cabinet, 17 September 2025

encompass the townscape composition at the base of the conservation area where Balgores Lane and Crossways meet. The Gidea Park CAAMP (appendix 3) reflects the changes in the area since the last appraisal was done (2008), and the challenges the conservation area faces. Section 6 'managing change' provides detailed guidance for the Council and developers on how to manage change in Gidea Park while protecting it's historic character.

- 1.9 Part 2 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (2) states that "...to determine whether any parts or any further parts of their area should be designated as conservation areas; and, if they so determine, they shall designate those parts accordingly". Changes to the boundary of a CA is classified as CA designation, and under part 3, section 4 of the constitution, approval of the Executive is required to designate a CA.
- 1.10 Havering has 11 conservation areas and the Council intends to update all CAAMPs to make sure they are up to date and sufficient to protect the CAs in the borough. Cabinet is therefore recommended to delegate authority to the Director of Planning and Public Protection for adoption of future CAAMPs, if there are no boundary changes proposed.
- 1.11 Documents included in the Appendix:

Appendix 1 – Romford CAAMP

Appendix 2 – Rainham CAAMP

Appendix 3 – Gidea Park CAAMP

Appendix 4 – Consultation Statement

Appendix 5 – CA Boundary Changes

**REASONS AND OPTIONS** 

### Reasons for the decision:

The Local Planning Authority has a legal duty to review and manage conservation areas. This includes review and updating of CAAMPs as required under the Planning (Listed Buildings and Conservation Areas) Act 1990. The Romford, Rainham, and Gidea Park CAAMPs were last updated in 2008, and therefore need to be updated.

### Other options considered:

1. Do not adopt and publish the Romford, Rainham, and Gidea Park CAAMPs. This option was rejected as consultation has already taken place.

**IMPLICATIONS AND RISKS** 

### Financial implications and risks:

The review and expansion of the existing CAAMPs within this cabinet report does not have any material financial implications on the authority. They will provide material considerations for planning decisions within the designated new boundaries of the three plans, and must be taken into account when assessing planning applications.

The cost of updating the CAAMPs has been funded by existing budgets.

### Legal implications and risks:

The Council as Local Planning Authority ("Council") has a duty under section 69(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) ("the Act") to determine which parts of its area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, and shall designate those areas as conservation areas.

Under section 69(2) of the Act from time to time the Council shall review the past exercise of the section 69(1) functions.

The designation of a conservation area has several planning consequences. These include (and are not limited to): ☐ Restrictions (and potential criminal offence) concerning demolition in a conservation area without express planning permission; ☐ Engagement of Statutory duty under section 72 of the Act, when determining planning applications in a conservation area to pay special attention to the desirability of preserving or enhancing the conservation area; ☐ Engagement of statutory duty under section 71 of the Act from time to time to formulate, publish proposals and hold a public meeting about them, for the preservation and enhancement of the conservation area: ☐ Restrictions on cutting down, topping, lopping, or uprooting trees in a conservation area; ☐ Greater restrictions for certain otherwise permitted development under the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) ("the GPDO"); ☐ Restricts the power of the secretary of state to cancel or modify an immediate Article 4 Direction (restricting permitted development rights) under the GPDO for certain classes of development;

### Cabinet, 17 September 2025

☐ Greater controls to display certain types of advertisement under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007

The Council has discharged its responsibilities under section 71 of the Act to: (1) formulate and publish proposals for the preservation and enhancement of any parts of their area which are conservation areas; (2) consider proposals at a public meeting; and (3) have regard to any views expressed at any public meetings.

### **Human Resources implications and risks:**

The recommendations made in this report do not appear to give rise to any identifiable HR risks or implications that would affect either the Council or its workforce.

### **Equalities implications and risks:**

The Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010 requires the Council, when exercising its functions, to have 'due regard' to:

- (i) The need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (ii) The need to advance equality of opportunity between persons who share protected characteristics and those who do not, and;
- (iii) Foster good relations between those who have protected characteristics and those who do not.

Note: 'Protected characteristics' are age, sex, race, disability, sexual orientation, marriage and civil partnerships, religion or belief, pregnancy and maternity and gender reassignment.

The Council is committed to all of the above in the provision, procurement and commissioning of its services, and the employment of its workforce. In addition, the Council is also committed to improving the quality of life and wellbeing for all Havering residents in respect of socio-economics and health determinants.

An EqHIA (Equality and Health Impact Assessment) is usually carried out when a proposed or planned activity is likely to affect staff, service users, or other residents.

The Council seeks to ensure equality, inclusion, and dignity for all in all situations.

There are no equalities implications.

### Health and Wellbeing implications and Risks:

Havering Council is committed to promoting and protecting the health and wellbeing of residents.

### Cabinet, 17 September 2025

Protecting and enhancing cultural heritage can broadly been seen as contributing to positive health and wellbeing. Research by <u>Historic England</u> identifies a modest but not insignificant impact that cultural heritage can have on wellbeing, finding an association between proximity to dense cultural heritage and reported life satisfaction. Historic England's report places particular emphasis on the impact of grade II listed buildings and other cultural heritage that are accessible and integrated within our daily lives, such as those that will be covered by local Conservation Area Appraisal and Management Plans.

There are no anticipated health and wellbeing risks arising from this decision.

### **ENVIRONMENTAL AND CLIMATE CHANGE IMPLICATIONS AND RISKS**

The recommendations made in this report do not appear to conflict with the Council's policy on Environmental and Climate implications.

**BACKGROUND PAPERS** 

n/a



# ROMFORD CONSERVATION AREA APPRAISAL AND MANAGEMENT PLAN JULY 2025







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www.purcelluk.com

Date	Issue	Revision	Reviewed	Approved
November 2024	01	First Draft	MH	MH
February 2025	02	Second Draft	EB	EB
March 2025	03	Third Draft	EB	EB
July 2025	04	Final	EB	EB

### ROMFORD CONSERVATION AREA APPRAISAL AND MANAGEMENT PLAN

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### 1.0 Introduction

This section provides information about what conservation area designation means and its implications for development. It also gives an overview of the Romford Conservation Area, sets out the purpose of the Conservation Area Appraisal and Management Plan (CAAMP) and outlines the consultation process that has been undertaken to prepare it.

#### What is a Conservation Area? 1.1

A conservation area is defined as an 'area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance.'01

Designation of a conservation area recognises the unique quality of the heritage of that area as a whole. This quality is derived not only from individual buildings but also other features, including (but not limited to) topography, grain, relaterials, thoroughfares, views, open spaces and landscape. ese all contribute to the historic character and appearance of an area, resulting in a distinctive local identity and sense of place.

The extent to which a building, or group of buildings or structures, positively shapes the character of a conservation area is derived from its exterior – principally those elevations which are street-facing but also side and rear elevations, the integrity of its historic fabric, overall scale and massing, detailing and materials. Open spaces, whether they are public or private, green or hard landscaped, can all contribute to the special interest of an area. Furthermore, the spaces between buildings, such as alleys, streets, paths and yards, all contribute to a conservation area's appearance and character.

#### 1.2 What Does Conservation Area Designation Mean?

The aim of conservation area designation is to preserve or enhance the character and appearance which makes the area special. To ensure this, changes to the external appearance of buildings in a conservation area may require planning permission from the Local Planning Authority, as certain permitted development rights are curtailed. For example, full or substantial demolition of a building will require planning permission and works to trees within conservation areas must be notified to the Local Planning Authority in advance. There are often further restrictions in place in conservation areas through Article 4 directions, which remove certain permitted development rights.

Under the National Planning Policy Framework (NPPF), conservation areas are designated heritage assets, and their conservation is to be given great weight when determining planning applications.<sup>02</sup> Further details can be found in Section 6.

The 2016-2030 Havering Local Plan (adopted in 2021) includes Policy 28, Heritage Assets, which sets out the Council's approach to development impacting heritage assets, including conservation areas and their settings.

#### 1.3 **Romford Conservation Area**

The Romford Conservation Area is one of 11 conservation areas in the London Borough of Havering, each distinctly individual in character and representing a variety of the surviving areas from different periods of the borough's past. It was designated in 1968.

Romford is a historic market town northeast of London with origins dating to initial Roman settlement. It was granted its first Market Charter in 1247, when its tradition of commerce officially began; the relocation of its church to the north side of the marketplace in the early 15th century cemented the importance of the market crossroads as Romford's social and economic heart.

This importance is reflected in the conservation area's historic buildings, erected over the centuries to accommodate local trade and industry, as well as in its street plan, which remains centred upon the crossroads of Market Place, High Street, North Street and South Street. Modern redevelopment from the mid-20th century onward has eroded the character of the area to a degree; this and ongoing development pressures have resulted in the conservation area's placement on Historic England's register for Heritage at Risk. However, its special interest as a historic commercial centre of high local importance remains clearly legible.

### 1.0 Introduction

### 1.4 Conservation Area Boundary

### 1.4.1 Boundary Review

Understanding or appreciation of what is special about an area can change over time. Therefore it is important to review and take stock of the boundaries and character of a conservation area at intervals to ensure that the reasons for its designation are still relevant and evident, and that the proper management of change is in place.

A review of the boundary alongside any accompanying guidance and assessments should generally take place every five to ten years or in response to a notable change (positive or negative), including changes in policy or legislation. Until the present review (2025), there had been no changes made to the boundary of the conservation area since 1968.

present-day boundary encompasses the historic buildings the ancient crossroads at the centre of Romford where Market Place, the High Street, North Street and South Street meet.

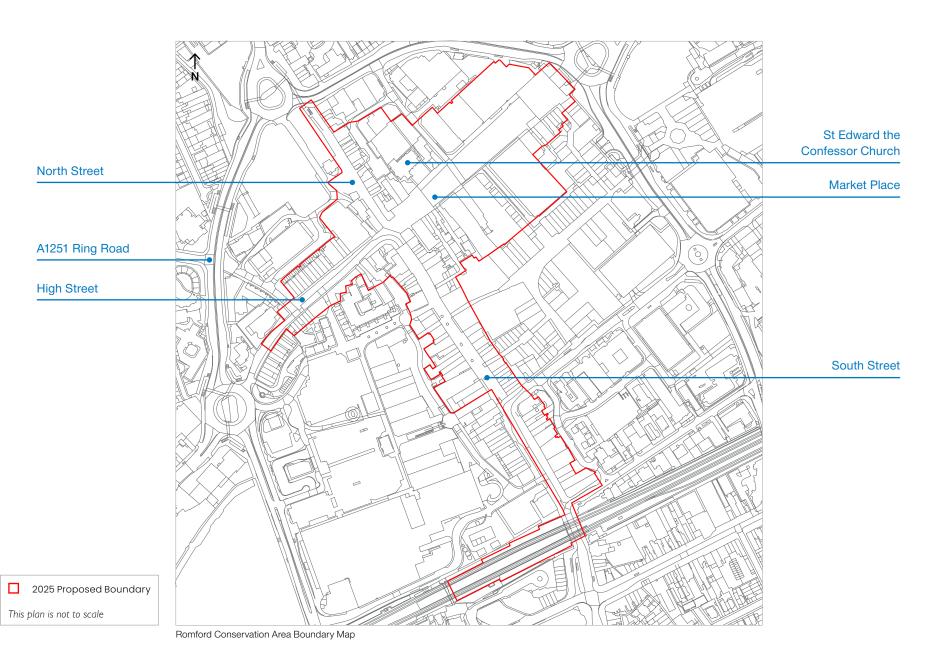
Following review of the 2008 conservation area appraisal, a subsequent conservation area site inspection undertaken in September 2024 and initial stakeholder consultation, the following extensions to the original boundary of the conservation area have been made. In general, the full plots of buildings within the boundary along Market Place, High Street, North Street and South Street are now included and the boundary extended southward to include the pedestrianised eastern section of South Street to its intersection with Eastern Road and Romford Train Station.

There are a few instances at the fringes of the conservation area where it was not considered appropriate to include full building plots. These include the recent redevelopment along the eastern side of North Street at its northern end, which comprises starkly modern massing and has fully eroded historic plot boundaries. The late-20th century Salvation Army Church along the north side of the High Street at the western end of the conservation area is also not proposed for inclusion due to its lack of historic and architectural relationship with the conservation area, and as it is largely concealed from views from within the conservation area by the Woolpack public house building, which it is recessed behind.

The boundary of the Conservation Area has been extended along its southeastern section, south of Market Place. This extension aims to incorporate the early-to-mid 20th-century shops and department stores within the conservation area. Careful consideration has been exercised in this expansion to include only those buildings that reflect the architectural character of the area. Consequently, the buildings comprising the majority of the Liberty Shopping Centre have been excluded from this expansion. The new boundary is established where the earlier shopping structures meet the Liberty Centre. It is noted that the post-war buildings along this side of the Market Place constitute an opportunity for enhancement, however their inclusion is justified on the grounds of the important frontage they provide to the Market Place, their appropriate scale, some architectural interest and their continued retail use.

It is noted that the scale and materiality of the modern Romford Shopping Hall complex and recent hotel redevelopment along the north side of Market Place are also incongruous to the architectural and historic character of the conservation area; however, these are included within the boundary due to their key position fronting the conservation area's defining and most important historic open space.

These extensions are reflected on the Romford Conservation Area Boundary map on the following page.



### 1.0 Introduction

### 1.5 Purpose and Scope of the Conservation Area Appraisal and Management Plan

Understanding the character and significance of conservation areas is essential for managing change within them. It is therefore a requirement under the Planning (Listed Buildings and Conservation Areas) Act 1990 that all Local Planning Authorities 'formulate and publish proposals for the preservation and enhancement' of conservation areas within their jurisdiction, and that conservation areas are periodically reviewed.

These proposals are normally presented in the form of a CAAMP, which defines and documents the special interest of a conservation area (see Section 2), analyses the characteristics that make it special (see Sections 3 and 4), is condition (see Section 5) and sets out a plan for managing ange to ensure its ongoing protection and enhancement (Section 6).

This CAAMP has been prepared in line with current best practice guidance published by Historic England, the government's heritage advisor and the public body which manages the care and protection of the nation's historic environment.

This document is intended to be comprehensive; however the omission of any building, structure, feature or space does not imply that the element is not significant or does not positively contribute to the character and special interest of the conservation area. The protocols and guidance provided in **Section 6** are applicable in every instance.

The assessments which provide the baseline information for this CAAMP have been carried out using publicly available resources and thorough on-site analysis from the publicly accessible parts of the Romford Conservation Area.

### 1.6 Consultation and Engagement

It is a statutory requirement under Section 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990 that conservation area guidance produced by or on behalf of the Local Planning Authority be subject to public consultation, and for the Local Planning Authority to have regard of the views expressed by consultees.

Initial consultation was undertaken with key stakeholders, including Historic England, members of the Romford Civic Society and the London Borough of Havering Planning Team, at early stages of the CAAMP drafting process to raise awareness of the conservation area review, utilise local understanding of the area's special interest and gather feedback on opportunities for enhancing this special interest and on the proposed conservation area boundary.

A draft of this CAAMP underwent public consultation from 28th April to 9th June 2025 including a public event. Comments received from this consultation have been incorporated into the final CAAMP as appropriate.



### 2.0 Summary of Special Interest

Romford's special interest is drawn from its ancient crossroads and the historic buildings associated with its position as a commercial trading post, which has been in consistent use since at least the medieval period to the present day.

Special interest is also drawn from the existence of a group of high-quality historic buildings at the western end of Market Place, some of which are listed. These focus on the parish church while also including buildings such as Church House, No.7 Market Place, The Golden Lion Inn, the Lamb Inn and a series of early 20th century bank buildings. This group contributes substantial historic and architectural character to the townscape, visible in part from each of the crossroads' principal streets.

ecial interest is also drawn from the representation of the evolving commercial shopping provision in Romford, inating from the historic market on Market Place which formed the crux of Romford's social and economic development, extending through the 20th century. Medieval burgage plots which remain legible in part along the southern side of Market Place and on the High Street add to the appreciation of the area's medieval past.

Victorian industrial and commercial prosperity is represented not only through the rebuilt parish church, but also through the surviving brewery buildings and public houses that were so integral to Romford's economy, mostly concentrated on the High Street. The arrival of the railway at the beginning of the Victorian period served as the stimulus for this growth and prosperity. The importance of the railway continued into the 20th century, especially the inter-war and post-war periods, which saw Romford increasingly becoming the social and commercial centre of the wider area.



View of Market Place, westwards,



View across St Edward the Confessor front churchyard, looking southwest.



View of The Woolpack on the High Street.

### 2.0 Summary of Special Interest

The Quadrant Arcade remains one of the more prominent signifiers of Romford's commercial development in the Interwar period, as does accompanying 1930s development along South Street. Architectural detail survives in places such as at roof level, where terraces of commercial plots are appreciable.

1960s arcades similarly represent the continuously evolving commercial offer of Romford's centre.



View east along the High Street. Romford Brewery buildings and The White Hart (The Bitter End) are visible to the right.



View of Lloyds Bank, with the church spire of St Edward the Confessor visible to the far right.



View from South Street of the crossroads, the White Lion visible to the centre left, and Lloyds Bank to the centre right.



View of South Street, looking north. The Quadrant Arcade is prominent on the right.



#### 3.1 Timeline

The following offers a summary of Romford's historic development.

Settlement originates where the Colchester to London Roman Road forded the River Rom.

#### 1247

A Market Charter was granted, and a town grew up around the common ground beside the Great Essex Road.

#### 1410

Chapel dedicated to St Edward the Confessor built on the Market Place.

### 1465

Page Royal Charter formed the liberty of Havering.

### ္ကြာ <sub>1670</sub>

c.323 houses formed a linear town around the Market Place and High Street.

#### 1709

A brewery was established behind the Star Inn, the forerunner to the prosperous Ind Coope & Sons Brewery.

#### 1839

The railway arrives in Romford.

#### 1849

The parish church, St Edward the Confessor, is rebuilt.

#### 1894

Romford Urban District Council formed.

#### 1937

The Municipal Borough of Romford formed following rapid suburban expansion and redevelopment of the town centre.

### 1944

Romford heavily bombed during WWII, including the parish church.

### 1965

London Borough of Havering formed, incorporating Romford.

#### 1960s-70s

Radical replanning of Romford erodes a large part of the historic town centre, with the ring road built 1970, truncating the market town crossroads.

#### 1972

The Liberty Shopping Centre was completed, replacing historic townscape southwest of the crossroads

### 1993

Ind Coope & Sons Brewery was closed and demolished, replaced by a shopping centre called The Brewery to the southwest of the crossroads

### 2006

Tollgate House built at the western end of Market Place

#### 2013

Romford Shopping Hall completed



A view of Market Place in 1898, looking west. The old Bull Inn is visible to the far left, the church spire to the right. (Havering Libraries Local Studies)

### 3.2 Early Development

The settlement of Rumford (later Romford) grew up where the River Rum (or Rom) crossed the Roman road from London to Colchester. It grew into a natural trading post before the city of London, with a market held on the common ground straddling what had become known as the Great Essex Road, known today as Market Place. In 1247 Romford was granted a Royal Charter to hold a weekly market, and another to hold annual fairs in 1250. Its position as a principal trading centre between Essex and London was by this point firmly established.

A substantial town grew up along the market core, buildings lining the Market Place and High Street. The chapel of St Edward's was built on The Market Place in 1410. A Royal Curter of 1465 formed the liberty of Havering, independent the County of Essex and governed from a courthouse in the riket Place. By the 1600s Romford was being described as the 'great market town for corn and cattle', with an estimated houses by 1670.



Extract of Christopher Saxon's map of Essex, 1579. One of the earliest maps recording Romford, labelled here as "Rumford". Copyright: British Library

### 3.3 Romford in the 18th Century

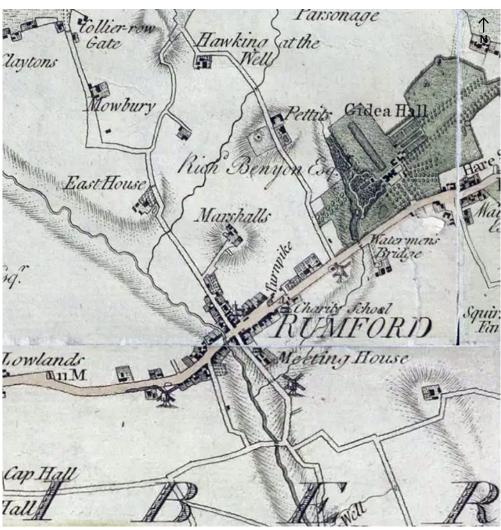
The plan form of the town continued to be principally linear by the start of the 18th century, formed of narrow burgage plots along either side of Market Place and the High Street. Inns and similar premises dominated, catering to the high volume of trader traffic, each of which had arched passageways leading to long rear service yards. Of 22 pubs recorded in 1762, three surviving today are recorded: the King's Head on Market Place; the Golden Lion at the corner of North Street; and the White Hart on the High Street.

One of Romford's oldest industries was founded in 1708 when Benjamin Wilson opened a small brewery behind the Star Inn on the High Street beside the River Rom.<sup>01</sup> It was purchased by Edward Ind in 1799 when it became part of Ind Smith, from 1845 known as Ind Coope. The brewery went on to supply not only the cluster of local inns, but public houses across London and the southeast of England, the premise growing to encompass a 20-acre site south of the High Street by the 1970s, ultimately closing in 1997.<sup>02</sup>

Page 67

High Street, Romford, 1895, Ind Coope brewery in middle ground on right (Havering Libraries Local Studies)

Romford's linear development began to expand north and south, creating a town centre of four quarters around a crossroads, with Market Place to the west, the High Street to the east, and building along comparatively narrower roads extending north and south.



Chapman & Andre's 1777 map, showing linear development expanding into a four-quartered settlement around a crossroads (British Library)

<sup>01</sup> Thames Chase (2024) 'The Old Brewery'. Available at: https://www.thameschase.org.uk/about-thames-chase/places-of-interest/the-old-brewery

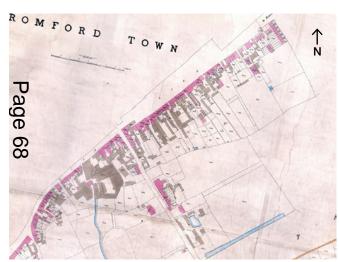
<sup>02</sup> Thames Chase (2024) 'The Old Brewery'. Available at: https://www.thameschase.org.uk/about-thames-chase/places-of-interest/the-old-brewery

### 3.4 19th Century Growth

The arrival of the railway and the opening of Romford train station in 1839 brought a corresponding growth in tourism, trade, and local prosperity. South Street quickly developed as the principal link between the town center and the station, while plots flanking the High Street and Market Place remained narrow, with deep rear yards.

The prosperity of mid-19th century South Street is evident in the 1871 Ordnance Survey map, where substantial detached and semi-detached houses line the southern end of the street, set far back from the road. Many of these houses feature large, expansive garden plots. The location of the county court further exemplifies the growth and prosperity of Romford during this period.

Development extended around the well-established quadrant structure, with the central crossroads of the Romford town centre as the nucleus. Market Place became fully hemmed in by coaching inns and later development, though its function as an open-air livestock market remained active. The southwest was dominated by industry, chiefly the brewery.



1844 Tithe Map showing the southern part of Romford, the Ind Coope brewery indicated by group of large buildings along the River Rom (The Genealogist)



1845 Tithe Map showing the northern part of Romford (The Genealogist)

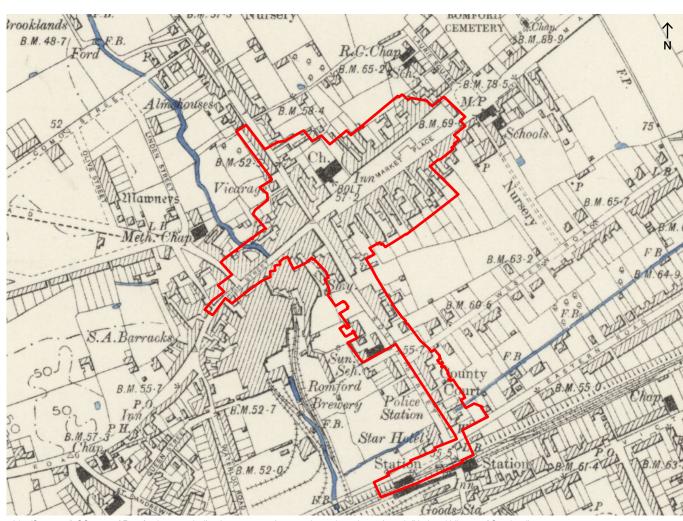


1871 ODS map showing the southern end of South Street.

The chapel for St Edward the Confessor on Market Place pulled down after being deemed unfit for purpose and was rebuilt in 1856 by the architect John Johnson in a gothic revival style. Using rubble stone and ashlar dressings, it included a 162ft spire and interiors that incorporated older monuments.

Over the latter half of the 19th century a range of shopfronts and pubs replaced existing buildings on the High Street around the established brewery offices. The White Hart was built in 1898 by Ind Coope Brewery as the Tap House on the site of a 15th century coaching Inn, and would continue to be used as a major venue for clubs, society and civic events until its closure in the early 2000s. The range of shopfronts with flats above at 25-35 High Street, as well as the Woolpack public house to the northwest were also built in the late 19th century, indicative of the commercial growth of the town the tothe northwest.





1895 (Surveyed) OS map of Romford centre. Indicative conservation area boundary shown in red. (National Library of Scotland)

### 3.5 Romford Centre 20th Century

At the turn of the 20th century, the quarter to the southeast of the crossroads still retained open plots to the rear of its Market Place and South Street frontages, accessed via narrow alleys between buildings and via Western Road to the south, while the relentlessly growing Ind, Coope and Co brewery, by this point supplied with its own railway line, dominated the southwestern quadrant. The Rom continued to flow freely across the northwest quadrant to the rear of High Street and North Street frontages, while a network of subdivided plots extended to the northeast.

### Inter-war Development

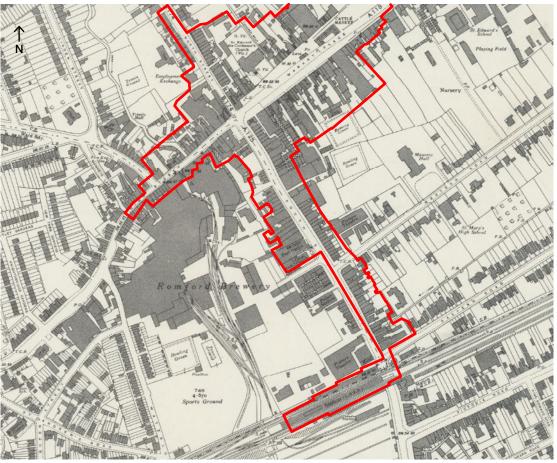
The suburban expansion of London over the 1930s soon reched Romford, and the town modernised rapidly at the ense of many Victorian or older buildings, replaced by Art Deco, Neo-Classical and Queen Anne designs. This is pericularly evident along South Street, where the oncelarge plots of houses set back from the street have been replaced with denser, larger commercial buildings that follow a consistent street line..



Photo of Quadrant Arcade 1938 (Havering Libraries Local Studies)

The Quadrant Arcade, a state-of-the-art covered shopping centre, was opened in 1935. This was concurrent with the widening of South Street, resulting in a a substantial amount of Inter-war redevelopment, the architectural character of which remains legible today within this part of the centre. The new Bull Inn was opened on the site of its early 17th century or 18th century predecessor in 1929, one of six marketplace pubs at the time, alongside The Lamb. The nationwide building boom of high street banks saw to the construction of three

competing branches on three of the four corners of the market crossroads in quick succession over the 1930s, including: The Prudential Building; Lloyds Bank; and the Co-op, while HSBC had taken over a 1905 building nearby at No.9 Market Place in 1920. By the outbreak of the Second World War in 1939 the replacement of much of the narrow townscape grid of earlier centuries with large retail halls and civic buildings had drastically changed the streetscape, with small burgage plots displaced in many places by large retail plots.



1939 (surveyed) OS map of Romford centre, indicative conservation area boundary is shown in red. (National Library of Scotland)

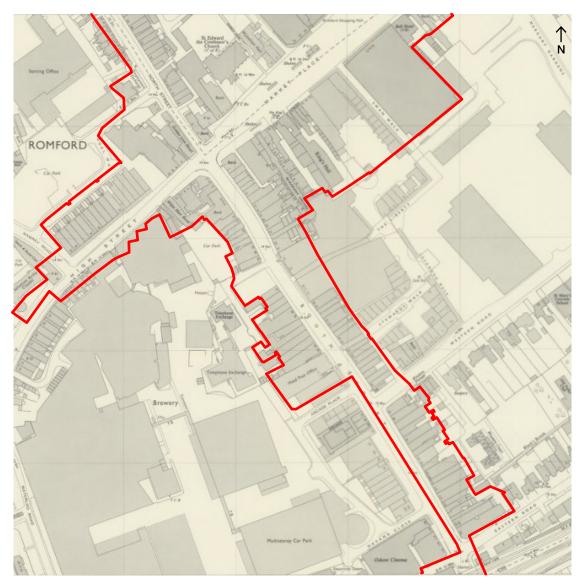
### Post-War Development

The closure of the cattle market in 1958 signalled the end of Romford's function as a traditional market town. Postwar rebuilding transformed the north side of High Street following bomb damage, and there was further development at the town periphery. Rapid population expansion continued, and in 1965 the municipal borough was abolished and absorbed into the London Borough of Havering.

Over the 1960s and 70s the town centre was part of a radical replanning that replaced a large degree of historic fabric with new retail precincts and laid out a tight ring road around the town centre. This road truncated and pedestrianised the four arms of crossroads, severing Romford's historic core from the wider town, but also improving its shopping experience though the removal of vehicular traffic through Market Place. Only surviving pre-20th century fabric within the ring road were the centre's historic inns, the 19th century brewery, St ard's Church and the neighbouring Church House.

The 1969 Ordnance Survey map shows this redevelopment in progress, the swathes of open land and plots just beyond the historic crossroads swept away for large scale commercial development.

The former brewery site by that time known as Star Brewery, was closed in 1993 and replaced by an expansive retail development known as The Brewery; it extends to the rear of frontages along the west side of South Street alongside a substantial car park.



1969 (surveyed) OS map of Romford centre, indicative conservation boundary shown in red. (National Libraries of Scotland)

### 3.6 New Additions in the 21st Century

The Havering Museum was opened within the redeveloped former brewery buildings along the south side of High Street in 2010. Shortly thereafter, a mixed-use scheme known as Tollgate House, loosely designed in the character of a Neoclassical market hall, was completed in 2006 on the site of a former turnpike tollgate. Sites along the east side of Market Link have been redeveloped as hotels in recent years, with one overlooking Market Place.

New housing has also been introduced to the area via a mixed-use block with ground floor shops and offices and residential units above erected on the site of the Edwardian Rumford Shopping Hall along the north-east side of Market PTDe, noticeably taller than neighbouring development. High-residential development has also been erected in the immediate setting of the conservation area to the north-west and east, some still under construction, all visible from the historic crossroads.

### 4.1 Location, Topography and Geology

The Romford Conservation Area is within the centre north of the London Borough of Havering, and falls within the area of the London Basin. It is approximately 20 kilometres east of London city centre, and 8 kilometres north of the River Thames. The town centre is located at the point where the Great East Road, a highway dating back to the Romans, crossed the River Rom, and where a weekly market has been held since at least 1247. The River Rom is now mostly culverted, flowing beneath Angel Way and the modern Brewery shopping complex, towards the River Thames.

Romford is about 30 metres above sea-level, and the town centre and conservation area is level throughout. The geology of the area is complex, with alluvial and head deposits to west associated with the River Rom and gravel terraces cryling London Clay to the east. These characteristics played a key role in Romford's prehistoric use, as the westercourses and terraces would have been appealing places for human settlement. Of

- Romford Conservation
  Area
- Gidea Park Conservation
  Area
- 01 Romford Train Station
- South Street
- Market Place

- 04 Havering Town Hall
- 05 St Edward the Confessor Church
- 06 North Street
- oo North Street
- 07 A1251 Ring Road
- 08 High Street

This plan is not to scale



Aerial image of Romford centre's location in its wider surrounding context. The conservation area is outlined in red. Base plan ©GoogleEarth

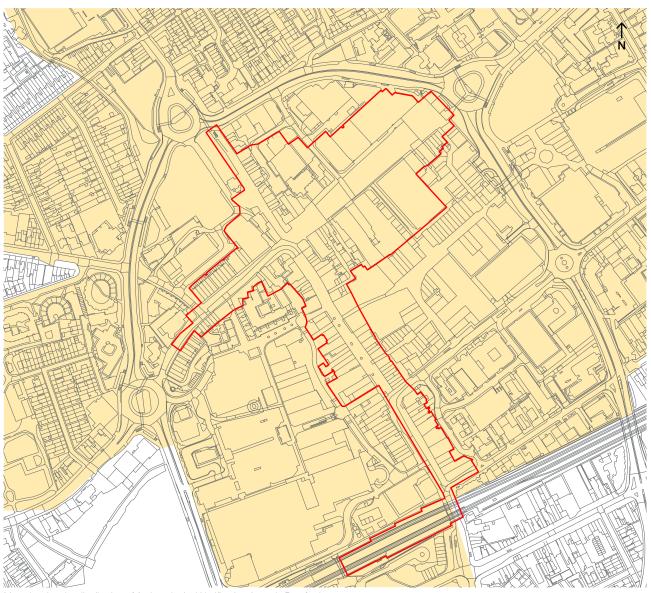
Oxford Archaeology (2024) 'Archaeological Priority Area Appraisal: London Borough of Havering'. Available at: chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/ https://www.havering.gov.uk/downloads/file/6708/havering-archaeological-priorityareas-report

### 4.2 Archaeology

The conservation area covers two of Havering's Archaeological Priority Areas (APA); 2.11 and 2.19. 2.11 is a Tier 2 APA that is centred on the Roman and medieval settlement and market town of Romford. A small section of the southern end of the conservation area reaches into 2.19. 2.19 is a Tier 2 APA that incorporates a historic settlement known as Oldchurch, a precursor settlement to Romford. In addition, APA 2.24 covers the course of the London to Colchester Roman road which is presumed to follow the path of High Street; this is also classified at Tier 2. Due to Romford's long history and the finds gathered by prior archaeological investigation, there remains a strong potential for further discoveries of archaeological material from Prehistory onwards. <sup>02</sup>

There are no scheduled monuments within the conservation are a or its near setting.

Further information can be found by consulting the Archaeological Priority Area Appraisal written by Oxford Archaeology in 2024 for the London Borough of Havering.



Map showing the distribution of Archaeological Notification Areas in Romford.

Oxford Archaeology (2024) 'Archaeological Priority Area Appraisal: London Borough of Havering'. Available at: chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/ https://www.havering.gov.uk/downloads/file/6708/havering-archaeological-priorityareas-report

### 4.3 The Setting of the Conservation Area

The setting of the conservation area has been considerably shaped by infrastructure and new development, particularly by the railway line to the south, and the mid/late 20th century ring road which encircles the conservation area and points south. The latter truncated the conservation area roads to the east, north and west, creating a definitive boundary of a busy main road, though in turn this has removed busy traffic along the historic byway of Market Place and the High Street.

Development to the north and west of this ring road is dominated by later housing, while a cluster of borough civic buildings including the Havering Town Hall are to the east, all accessed from the conservation area by pedestrian subways, capcealed from conservation area views.

ere is extensive mid-20th century and later building within the ring road and the immediate setting of the servation area to the north of Market Place and the High Street, including large, mixed-use, residential and office developments of five or more storeys. These are visible in northward views, including along North Street from South Street and the historic crossroads, from the St Edward's churchyard and also from Market Place northward along Market Link, and generally fail to relate to any historic context. There are two places of worship to the northwest and west within the ring road, the 19th century Trinity Methodist Church and a late 20th century Salvation Army Church to the west, both only partially visible in mid-range views from the west end of the High Street and generally inconspicuous. The former is mostly obscured by a large, late-20th century multistorey car park with a dull, utilitarian frontage just beyond the conservation area boundary which detracts from its setting.

The area to the southwest of the conservation area behind the High Street and South Street is dominated by The Brewery shopping centre, a large late 20th century retail park mostly of two to three-storeys with an extensive open car park to the west. There is pedestrian access to this from the High Street via the historic former entrance in through the brewery frontage, though the historic urban grain here conceals the development from the High Street. Its visual impact is greater from South Street in views along Exchange Street and Arcade Place.



The A1251 ring road encircles the conservation area to the east, north and west.



New development lining the east side of North Street.

Redevelopment here also includes Malt House Place and Logan Mews, which comprise four to five-storey residential blocks arranged to the rear of buildings along the south side of the High Street. There are service yards and back-of-house spaces interwoven amongst the modern development; these have an unkempt character and generally detract from the setting of the conservation area.



Approach to conservation area & Market Place via pedestrian subway.



View of setting from South Street, looking west along Exchange Street.

The area to the southeast beyond the ring road includes recently redeveloped residential high rises which overlook the conservation area and are highly visible from the eastern end of Market Place. The conservation area's immediate southeastern setting within the ring road is largely occupied by the Liberty Shopping Centre, a predominantly two to three-storey shopping complex that in part falls within the conservation area boundary, but does little to relate to any historic context. Its flat roof accommodates car parking and services; these roof units, some of which are two-storey brick extensions, are visible intermittently from the main thoroughfares of the conservation area, creating a cluttered roofline.

The Liberty is accessed from the conservation area via padestrian entrances in from Market Place and South Street which generally blend in with their commercial surroundings part from the access in from the southeast side of Market Place, where the entrance and adjacent, utilitarian late-20th century development substantially detract from conservation area character.

To the south the conservation area ends at the terminus of the pedestrianised segment of Eastern Road. The Conservation Area thins as it runs south Along South Street to include only the eastern half of the Road and Romford Train Station. The opposite side of South Street has mid/late 20th century commercial and office buildings with nondescript facades of low aesthetic value.



Insensitive late-20th century development within and in the setting of the conservation area at south east end of Market Place.



Modern high-rise housing to the southeast is visible from Market Place.



Interior photos of the Liberty Shopping Centre, showing some of the shopfronts that form the southwest boundary of the conservation area



View south from conservation area boundary, along South Street.

### 4.4 Important Views

The combination of low-lying topography and the truncation of the crossroads by the 1970s ring road impedes long-range views into and out of the conservation area. Internally, the conservation area is experienced via established views along the four principal thoroughfares of Market Place, North Street, South Street and the High Street, and though kinetic views glimpsed whilst moving through the conservation area.

All views which take in heritage assets, whether or not they are designated, are considered important and contribute to the understanding and experience of the conservation area. Consequently, the views considered in this section are only an indicative selection and are not intended to be a comprehensive set.

### ws of the St Edward the Confessor Church Spire

Achie time of writing, one specific view within the conservation area has been identified within the Romford Masterplan, the view of the spire of St Edward's church along South Street from Romford Station. Incidental views of this prominent vertical landmark from all parts of the conservation area, as well as from the outside-in, are an important feature of the area's character, and help identify a local sense of place.

### **Street Views**

A number of historic public houses and banks enjoy prominent corner positions within the streetscape at the conservation area's historic crossroads, and characterise the commercial character of the conservation area. These include the Golden Lion on the northwestern corner of the crossroads, and the Neo-Georgian bank buildings forming the crossroad's other three corners. Views of these buildings up and down streets and across key townscape spaces contribute to the understanding of the conservation area's history as a market town and later evolution as a commercial hub.

Likewise the views of and from the railway station and bridges from the southern end of South Street assist in demonstrating the sense of arrival to the town centre from the railway



View of St Edward's spire & adjacent historic commercial frontages from South Street



View looking northwest across Market Place, featuring St Edward's & historic commercial and public house frontages.



View of Market Place from the crossroads, featuring prominent historic commercial frontages & spire of St Edward's.



Incidental view of the spire of St Edward's (Grade II\*), from the north-western boundary of the conservation area, Angel Way

Views toward and away from the crossroads along its four historic streets illustrate help make its importance as one of the area's oldest and most important elements of historic townscape legible. Views west down the High Street taken in the 19th century frontages of the former brewery buildings and the Woolpack public house building on the corner of Angel Way and the High Street, with which they share a historic relationship.

Eastward views comprise Market Place. Whilst this terminates at the 2006 Tollgate House and is flanked by modern redevelopment in places, views of Market Place as a historic open commercial space are key to understanding Romford's early history.

Neith Street and South Street are key historic routes within Funford, and offer longer-range views into and out of the Funt of the conservation area. These help to define the area's historic context and approaches.

Views along ancillary streets and into rear yards, particularly from Market Place, are experienced in kinetic views as one walks past. These tend to be of spaces of a more intimate scale, and, where they survive, illustrate the area's historic market town layout across narrow plots.



View west along High Street from crossroads



View into alley east of The Bull public house from Market Place illustrates historic townscape pattern.



View toward crossroads from South Street.

### 4.5 Key and Landmark Buildings

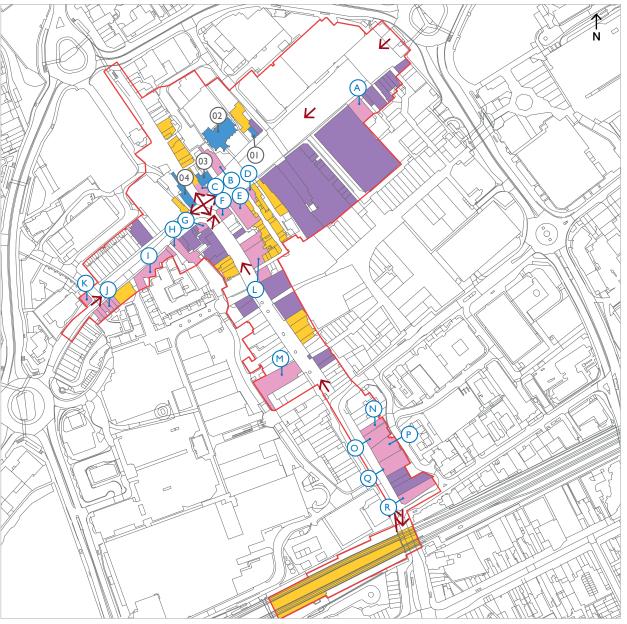
The special interest of the conservation area is often best experienced visually by taking in its historic buildings and spaces, as the majority of these contribute to the understanding of its special interest. However, there are individual buildings and spaces which play a more important role in establishing the character of the area, and are considered to be landmarks.

In Romford's case, landmarks are generally either statutorily or locally listed buildings, while several others also make a **positive contribution** to the area's historic or architectural character. These are identified on the plan opposite, as well as the conservation area's key views.

Dumber of buildings or spaces within the conservation area undary are identified as opportunities for enhancement. These are buildings or sites that comprise elements which detract from the character and appearance of the conservation area; their improvement or replacement is encouraged.

Prudential Building → Key Views The White Hart (The Bitter Listed Building End) 01 Church House (Grade II) Romford Brewery, High 02 Parish Church of St Edward Street, Romford the Confessor (Grade II\*) 25-35 High Street 03 The Lamb Public House The Woolpack (Grade II) Quadrant Arcade The Golden Lion Public 64 South Street (Facade is House (Grade II) old post office) Positive Contributor 97 South Street 97 - 101 South Street Opportunity for 103 - 111 South Street Enhancement O 113 - 117 South Street Locally Listed Asset 131 South Street The Bull Inn Note: Details of the locally listed 9 Market Place (HSBC) buildings in the conservation area Lloyds Bank are included as Appendix A. 28 Market Place Quadrant Arcade This plan is not to scale

The Co-op Bank



Map indicating the location of key and landmark buildings, key views & opportunities for conservation area enhancement.

### 4.6 Townscape and Spatial Analysis

The layout of the conservation area is densely urban, formed by the meeting of four, partly truncated principal roads to the north, east, south and west. These roads dominate the town plan, and nearly all of the conservation area's buildings front one of these roads.

The area to the north of Market Place and the High Street is interspersed by several smaller ancillary streets and access roads serving the large mid-to-late 20th and 21st century developments on the conservation area fringe. There are noticeably fewer breaks in built form along the south side of High Street, but some narrow alleyways and pedestrian routes provide access to rear yards to the south of Market Place, as well as into the shopping centre beyond. However, commercial into within the southeast quadrant of the conservation area eradicated most of its historic street pattern.

There are also few breaks within the building frontages lining either side of South Street, apart from two access routes into the retail and residential complex associated with the Brewery redevelopment to the southwest of the conservation area.

Some traditionally narrow plots remain in places; these are articulated in street views somewhat sporadically in Market Place and in sections along South Street. More commonly, broad building façades incorporate numerous ground floor shopfronts, as is found along the south side of High Street and the east side of North Street.



Individual plots remain legible in stretches of South Street.



Larger frontages incorporate multiple ground floor units in High Street.

### 4.7 Boundary Treatments

As the conservation area comprises a historically commercial area, boundary treatments generally do not form a prevalent part of the historic townscape. The exception to this is St Edward's church in Market Place, where the churchyard is set back behind a rubble wall with a striking pointed arch entrance gate in stone which forms a prominent part of the Market Place streetscape. The plot to the rear of the church is demarcated by a tall brick wall to the west and railings to the north and east; the latter also line the pathway between the front and rear churchyard. The other exception is the strong boundary to the south of the conservation area formed by the railway embankment, the brick arches of which form the elevation of the railway station.

Other existing boundary treatments include modern brick walls and railings to parking areas north of Market Place, and the rear boundary wall in Angel Way which encloses the rear plots to the mid-20th century mixed use block along the north side of the High Street. The latter marks the edge of the conservation area and comprises a mix of doors, security deterrents and brickwork which detracts from area character and appearance.

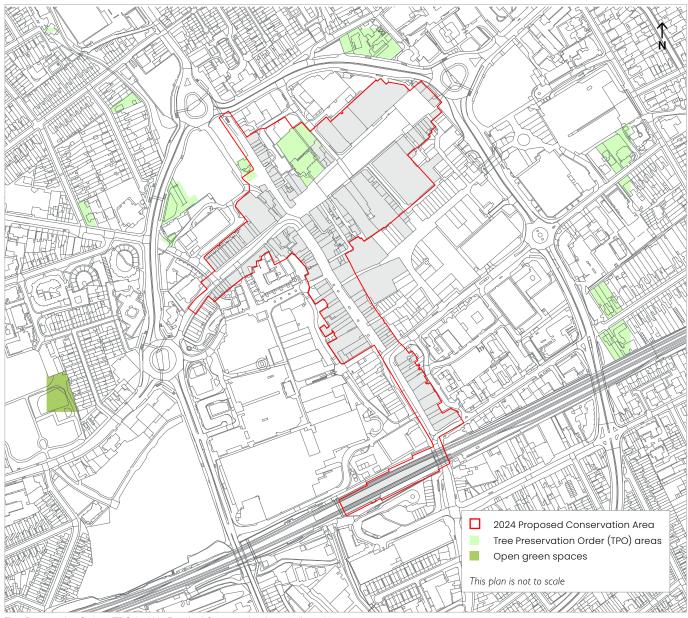
### 4.8 Open Spaces and Trees

The Romford Conservation Area is dominated by the large open space of Market Place, the historic centre of the town. It is an expansive space which dominates the historic townscape, and its continued active use as an open-air market is integral to the special interest of the conservation area and makes a strong contribution. Use of pavement space by cafes or shops around the edge of this open space contributes activity and encourages footfall on non-market days.

While the area's predominantly urban character limits open space and permanent greenery, there are spaces which soften the townscape and improve the pedestrian experience. The churchyard of St Edward the Confessor includes a modest green facing Market Place and a large green to the report, connected by a pedestrian path, both make a strong worket Place is actively used by passers-by as a place to dwell and makes a strong contribution to the character of the conservation area. The rear part of the churchyard is kept private by metal railings and as it is not publicly accessible, which slightly tempers the contribution it makes to the conservation area. Its mature trees are protected by a Tree Preservation Order and contribute positively to the character of the conservation area and setting of the historic church.

A modest public seating area planted with mature trees is located north of the Golden Lion Public House. This space historically formed part of the vicarage garden, and its trees are also protected under a Tree Preservation Order (TPO). However, the character is very municipal and its contribution to the character of the conservation area is limited in its present condition.

There are a series of mature trees planted within pavements along the High Street, Market Place and South Street. These are prominent features of the public realm and contribute positively to the character and appearance of the conservation area.



Tree Preservation Orders (TPOs) within Romford Conservation Area, indicated in green.







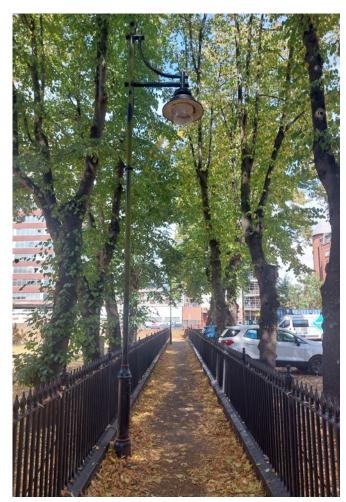
Trees and public realm in North Street.



View of St Edward's churchyard, looking southwest towards Market Place.



Street trees along High Street, looking towards Market Place.



Pathway north of the church, flanked by mature planting.

#### 4.9 Public Realm

#### 4.9.1 Street Surfaces

Street surfaces across the conservation area vary considerably due to its mix of pedestrianised or part-pedestrianised spaces. Pavements are generally surfaced with large concrete pavers and mostly granite kerbs.

The High Street is paved in granite setts at its eastern end where it is pedestrianised, and surfaced in tarmac to the west where it is open to vehicles. Market Place is surfaced in a variety of pavers and granite setts, stretches of which are historic, arranged to indicate wayfinding routes. Parking spaces and plot markers for stalls within Market Place have been indicated in places by paver patterns and paint. South North Street are both pedestrianised, though access for vice vehicles is maintained, and laid in concrete pavers characteristic are varied in colour to indicate different pedestrian sees. Broader concrete pavers indicate pavements that are first with the street. Ancillary streets are generally in tarmac.

Paving is used across the conservation area to accentuate entrances or points of interest for pedestrians. The most notable of these instances is the circle arrangement at the crossroads, where a stone marker indicating the names of its historic streets is embedded at its centre.



Street furniture and surfaces used on the High Street.



Surface detail on the North Street square.



Surface detail on Market Place

### 4.9.2 Street Furniture, Lighting and Wayfinding

Outdoor seating is provided in several locations within the conservation area, with a concentration on South Street, Market Place and within a pedestrianised seating area on North Street. Seating in South Street and Market Place comprises fixed metal benches of a modern profile, on occasion wrapped around tree planters. Low-level planters introduce greenery to pedestrian areas, such as on North Street, where their presence helps to soften the appearance a public recycling station. However, the design of planters throughout the conservation area is haphazard and lacks visual consistency. Public seating provisions promote active footfall and dwell time, contributing to the positive active character of the spaces. Several cafes in spaces along all four streets provide outdoor seating in warmer months.

with Street has notably higher volume of street furniture of the nother streets within the conservation area. In addition to seating and planters, there are also free-standing advertising with stelephone boxes, defibrillators and public toilet facilities installed.

Bollards are used in places such as the central crossroads to control traffic access and delineate between pavements and shared use roadway. A pair of robust stone markers remain on the crossroads and indicate a vehicle access point from the crossroads through to Market Place.

Black plastic public bins are used across the conservation area. Racks of bicycle hoops are installed on South Street and the western end of the High Street.

Streetlamps are consistent throughout the conservation area, and comprise lanterns in a traditional profile and banner rails. These generally demarcate the conservation area's location, as design changes immediately to utilitarian profile outside of the conservation area's boundary, notably at the western end of the High Street.

Street signage principally relates to traffic control and wayfinding; this adds congestion to the street scene in places. A-boards, banners and other freestanding advertising placed on the pavement by local businesses also adds a degree of clutter at times.



Streetlamp detail on South Street, the old Post Office in the background.

### 4.10 Building Uses

Conservation area buildings remain principally in commercial or retail use; a number of buildings in mixed-use include residential units or offices at upper floors. There is also an array of ground-floor restaurants and cafes, and ground floors or full buildings occupied by banks. The historic provision of trader and tourist accommodation in roadside inns has been replaced by late 20th and early 21st century hotel developments, the latest a Premier Inn on the northern side of Market Place.

The former Brewery buildings at 19-21 High Street have been converted for cultural use by the Havering Museum. St Edward's Church and neighbouring Church House remain in Use as a place of worship along the north side of Market Ce.

### Scale and Massing

width, height and volume of buildings within the conservation area is highly varied, with buildings of two to three bays and three to four-storeys alongside large units with upwards of seven bays and three large storeys. Massing at the southern side and eastern end of Market Place is generally larger due to late 20th century development. There is a particularly appreciable variety of massing along South Street, where a mix of Inter-war commercial buildings hold their own alongside larger modern redevelopment.

Roofs vary between pitched, mansard or flat forms, which, together with varying building heights offer a lively roofscape indicative of the diverse array of building types and periods. Building heights within the conservation area generally remain deferential to the spire of St Edward the Confessor church, which remains appreciable throughout most of the streetscape.

#### 4.12 Materials

There is no predominant material used across the conservation area, indicative of its evolution as a rapidly changing commercial centre.

Stock and red brick is used extensively on 19th century buildings and several prominent 1930s commercial or public buildings, employed alongside stonework, metal work and decorative brick details.

Render or stone cladding is also evident across pre or early 19th century buildings and 1930s commercial architecture. This frequently incorporates fine decorative detailing, particularly on 1930s façades.

Concrete, glass and red or brown brick is dominant on the southern side of Market Place to mid to late-20th century commercial often to frontages.



View of South Street, showing a variety of building massing.

### 4.13 Architectural Styles and Periods

There is a range of architectural styles and periods found across the conservation area consistent with the area's historic evolution as a commercial centre.

### 4.13.1 Georgian and Earlier Buildings

The conservation area's earliest surviving buildings include Church House, a modest 15th/16th century building adjacent to St Edward's, and the Golden Lion, which retains characterful features such as its rear coachyard entrance, pedimented front entrance, corner quoins and window dressings, all appropriate to its prominent corner position. The Lamb public house in Market Place dates to the early-19th century; its frontage employs traditional massing but generally lacks detail



Georgian detailing to the southern façade of the Golden Lion pub, High Street.

### 4.13.2 Victorian Buildings

Several prominent buildings within the conservation area are excellent surviving examples of Victorian commercial, industrial and public building type, indicative of this period of extensive local redevelopment. St Edwards the Confessor church is representative of the significant investment made by the townspeople in their town in the mid-19th century, while the range of Brewery buildings and shopfronts along the High Street are indicative of how mid/late 19th century development industry and commercial activity shaped the town.

The Romford Brewery was built in 1851, a vast complex that occupied most of the land between the High Street, South Street and the railway line, of which the range of buildings on the south side of the High Street are all that remain. This range is typical of Victorian industrial design; stock brick, with a central section of three-storey, six bays in stock brick articulated with red brick piers and window arches at ground floor, and a three-storey, gabled extension added to the East in a similar style later, and a coach passage in through the principal façade, which now provides pedestrian access into the Brewery retail complex.

A series of red brick, commercial high street buildings were erected near to the brewery on the High Street in the late 19th century, characterised by brick ornamentation and steep pitched tiled roofs. The Woolpack is directly associated with the Brewery, a purpose built, corner plot public house with details such as mock Tudor timbering, decorative

barge boards and a projecting moulded cornice along both frontages. The White Hart public house at 7-13 High Street is typical of the English Domestic Revival Style, three-storeys, four bays with large oriel windows with timber frame and leaded lights at first floor. The range of buildings at Nos.25-35 retain a well detailed brick façade, with details such as stucco pilasters, decorative terracotta detailed gables, and tall hexagonal chimneys.

The HSBC building at 9 Market Place dates to 1905 and is a surviving example of the Free Renaissance style, a four-storey, red brick building with decorative stonework and canted bays, diluted to some extent by a subsequent eastern extension.



View of the Victorian Romford Brewery buildings on the High Street.

### 4.13.3 Inter-War Buildings

The most prevalent historic style is from the Inter-war period, illustrative of London's suburban expansion and development of high streets in the 1930s. Three of the four corners of the crossroads are occupied by 1930s Neo-Georgian banks, which feature entrance bays, symmetrical elevations, red brick façades and dressings in Portland stone. The surviving façade of the post office on South Street shows similar use of an earlier form of Neo-Georgian design, from 1912. There are also a series of fine commercial art deco frontages, the most prominent being the three-storey Quadrant Arcade, but others are at two-storeys with strong linear features carried through red brick and stucco or stone coursing. Groups of frontages can be identified as relating to the other based on projecting brok and cornice or balustrade design, despite subsequent

changing of ownership and different surface treatments, such as No.49-57 South Street, and No.71-83 South Street.

The Bull Inn on Market Place is another example of post WWI design; a two-storey, Neo-Georgian public house with a symmetrical façade articulated in red brick and stucco pilasters overlooking Market Place. This is a 1927 rebuild of the public house that preceded it.

### 4.13.4 Mid-20th Century and Later Buildings

Modern commercial and mixed-use development dominates a large proportion of the conservation area, generally to a lesser degree of architectural quality. This includes modern infill occupying narrow historic plots on South Street, the prominent mid-century slab block of the former Debenhams department store which projects forward into Market Place, and a broad, three-storey mid-century range of flats over an arcade of shopfronts at ground floor which lines the northern side of High Street. Whilst these often fail to respond to the context of their historic environment, some employ interesting materials or massing typical of their period.

Buildings to the eastern and northern sides of Market Place represent more recent redevelopment. These include the 2006 Tollgate House, a pastiche Neo-Georgian mixed-use building with a frontage in red brick, render and ashlar stone, as well as the redeveloped Romford Shopping Hall with flats above, which towers over Market Place at six-storeys in a range of materials.







The Neo-Georgian Co-operative Bank Building at the corner of Market Place and South Street

#### 4.14 Architectural Details

Historic architectural detail survives to principal elevations across the conservation area, particularly at upper floor level.

#### 4.14.1 Windows

A large proportion of historic windows have been replaced with uPVC. Where they have not, a variety of types can be seen, such as small leaded windows within the Church House, tall, multi-pane timber framed casement windows within the three bank buildings overlooking the crossroads, and Crittall windows within the northern elevation of the Quadrant Arcade.

#### 4.14.2 Decorative Brickwork and Relief

Rich brickwork and relief details survive across a series of commercial buildings on South Street and the High Street on Victorian or 1930s buildings respectively, a tangible indicator Commonford's pattern of historic development. These patterns and forms add material depth and interest to front and return expations.

Relief tilework to the east façade of The Woolpack public house records proudly displays its origins as an Ind Coope public house.



Detail of timber casement windows and stone detailing within the corner façade of the Lloyds building.



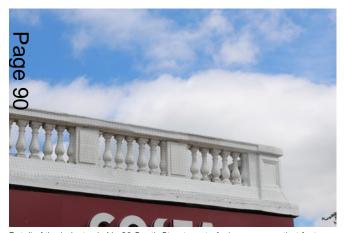
Detail of Woolpack decorative façade and signage, recording its origins as a Ind Coope public house.



Detail of west facing doorway of Church House, one of the conservation area's oldest buildings.

#### 4.14.3 Roofline Details

Distinctive balustrades or cornicing on a series of 1930s commercial terraces on South Street indicate a once unified ranges of shopfronts. These simple decorative elements add architectural and historic interest to the roofline along the southern part of South Street.



Detail of the balustrade No.83 South Street, part of a longer range that features at the southern perimeter of the conservation area.

### 4.14.4 Shopfronts

Ground floor shopfronts are largely modern replacements. Most situated within historic frontages do little to relate to the context of their buildings. Where historic shopfront features do survive, they are generally limited to corbels pilasters which separate individual units, though it is possible that historic shopfront features survive behind modern fascias and external finishes. The shopfront at 29 High Street employs proportions and materials appropriate to its Victorian context, including timber stallrisers, a recessed entrance, vertical elements between shopfront windows, and an appropriately-sized fascia beneath a moulded cornice.



Shopfront at No.29 High Street.



#### 5.1 Introduction

This section of the Conservation Area Appraisal and Management Plan provides analysis of the current issues and opportunities facing the Romford Conservation Area and reflects the findings of a detailed site survey and initial stakeholder consultation. It will be reviewed and updated following public consultation to ensure holistic coverage.

The analysis is set out around the below themes:

- 5.2 Detracting Buildings, Elements and Additions
- 5.3 Shopfronts and Advertising
- 5.4 Open Spaces and Public Realm
- 5.5 Maintenance and Repair of Buildings

5.5 Sustainable Development and Climate Change

Development Opportunity

Interpretation and Raising Awareness

9

# 5.2 Detracting Buildings, Elements and Additions

The quality and appearance of buildings throughout the conservation area is mixed. Whilst many historic frontages contribute positively to appearance and character of the area, there has been a considerable amount of insensitive redevelopment from the mid/late 20th century onward. Vacant buildings or retail units particularly detract from the area's special interest, as do unsympathetic accretions to street frontages. However, a number of these elements, from whole buildings to smaller-scale alterations, present opportunities for conservation area enhancement.

### 5.2.1 Detracting Buildings

Detracting buildings are identified as opportunities for enhancement on the area map included in **Section 4.5**. These buildings comprise massing, scale and/or materiality which do little to relate to the area's historic character and detract from the street scene. Some buildings are inappropriate modern and even very recent insertions; whilst others may be historic, they have undergone such extensive alteration that their former character no longer is appreciable. However there are also examples of modern commercial buildings comprising materials and massing which remain sensitive within the context of adjacent historic frontages.

If the opportunity arises to replace or alter detracting buildings, there is potential to enhance the conservation area by ensuring that proposals are sensitively designed and respond better to the area's historic context and the character and appearance of the townscape.

Any development within the setting of the conservation area should take into consideration its special interest, and be of high quality, sensitive design.



The projecting Liberty entrance pavilion in South Street clashes with adjacent historic character



Various approaches to modern redevelopment in Market Place

### 5.2.2 Unsympathetic Additions and Accretions

Modern accretions to historic building exteriors across the conservation area are largely unsympathetic. These elements, and particularly the cumulative impact of incremental additions, can detract from the appearance of historic elevations and, as a result, from the character of the conservation area. These include:

- Surface-mounted services such as cables, conduit and security systems; there is opportunity to reduce visual clutter across frontages by removing or rationalising these elements, or by relocating them to more discreet locations. It is recommended that installation of any new external devices or technology be limited to rear elevations or rerouted internally so that they remain concealed from the public realm. Opportunities should also be taken to remove redundant wiring.
  - Pigeon deterrents including spikes over doors and windows and netting are visible across several frontages. These have an unsightly, detrimental visual impact and there are opportunities to explore alternative, more humane deterrent methods whilst raising awareness amongst building owners of the negative effects of such forms of deterrent.

- Television aerials and satellite dishes are modern and highly conspicuous elements which are visually intrusive within historic streetscapes; these are found throughout the conservation area atop roofs and fixed to frontages, including to listed buildings. Often dishes and aerials remain fixed to buildings after they become redundant. There is opportunity to remove the latter, and ensure that any new devices are located along rear elevations, concealed from the public realm. Planning permission is required for the installation of telecoms equipment on walls and roofs visible from the public domain, and listed building consent is required for installation on listed buildings.
- Elements of rooftop service and plant fixtures are visible from street level in longer views across Market Place, and handrails for roof access are also visible in Market Place and South Street, in some cases atop buildings within the immediate setting of the conservation area; these are generally unsightly, utilitarian elements which add clutter to rooflines and clash with the historic character of the area. There is opportunity to rationalise the amount and location of rooftop plant and maintenance access when new or replacement plant fixtures are proposed and set handrails away from parapets so that they remain concealed in views from the street and wider conservation area.



Pigeon spikes & netting, South Street



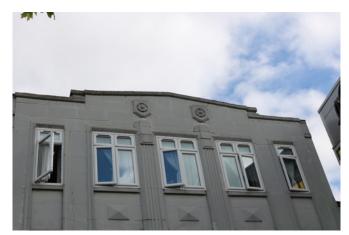
Cumulative impact of modern accretions to upper floors, Market Place

### 5.2.3 Windows, Doors and Rain Goods

There are examples of the insensitive replacement of historic timber or metal windows in uPVC throughout the conservation area, particularly at upper floors where their impact is highly visible. uPVC doors and plastic rain goods have also replaced original and traditional versions in places.

Plastic windows in particular negatively affect the appearance of buildings, but all plastic features are modern, alien additions to the historic environment and have a detrimental impact on the character and appearance of the conservation area. Their installation often constitutes the loss of the original or historic features and profiles, which incrementally reduces the special interest of the area. In addition, the use of plastic windows and dars reduces the breathability of traditionally constructed blidings, by preventing moisture from egressing the building; can cause wider damage to building fabric. There are constructives to return windows to traditional materials and appearance where they have been altered.

There are a few instances of visible rooflight installations to front facing roof pitches within historic façades in the High Street, North Street and South Street. These are particularly modern insertions which break up the appearance of historic pitched roofs and detract from the character and appearance of the conservation area. There is potential for an Article 4 direction to be implemented to better control proposals for window changes in the future.



Insensitive uPVC window replacement, South Street



Visible rooflights to front roof pitches in the High Street

### 5.2.4 Ancillary Spaces

The conservation comprises a series of ancillary alleyways and yards behind principal frontages, many of which are remnants of the area's former burgage plots. Whilst less visible from street views, they form an important element of the conservation area's historic character and aid in the understanding of its evolution over time.

However, their typically back-of-house use has led to a number of unsympathetic additions and accretions which detract from the character, appearance and use of the spaces. There is opportunity to review the approach to these spaces, and generate a strategy for how they might be better-incorporated into active use, and become attractive, intimate spaces in their own right.



Historic rear yards and alleys have the potential to enhance the character of the conservation area

### 5.2.5 Boundary Treatments

As the conservation area comprises a principally commercial area, boundary treatments are relatively few. The rear boundary wall along Angel Way that provides access to the upper floors of the mid-20th century block lining the north side of the High Street is in very poor condition, with highly-visible security deterrents and mismatched brickwork, gates, doors and garage doors. There is opportunity to improve this frontage with a streamlined design for its doors, gates, garage doors and signage that would replace unsightly elements and help unify the boundary treatment.

Some cafés, restaurants and public houses occupying ground floor units offer outdoor seating on a seasonal basis, and there is potential for this to expand; there is opportunity to ensure that the design of any boundary treatments such as railings, whether or temporary fencing is of a high-quality design in appropriate materials that remains sensitive to the historic context of the conservation area, and does not obstruct or clutter to the street scene. Any boundary treatments introduced in Market Place should ensure that the boundary wall to the St Edward's churchyard remains prominent and unobstructed in street views.



Utilitarian rear boundary treatments at conservation area edge in Angel Way

### 5.3 Shopfronts and Advertising

Commerce has shaped the conservation area at the heart of Romford from its origins. Few if any intact historic shopfronts survive within the conservation area, though individual historic shopfront components remain legible in places and some modern shopfronts comprise elements of traditional design. Given the range of dates and types of buildings present throughout the conservation area, there is no appropriate one-size-fits-all approach to improved shopfront design and implementation, though a degree of visual continuity which could enhance the character of the conservation area is possible to achieve through high quality design. Universally unsympathetic alterations and additions which detract from the character of the conservation area are noted below.

Oversized, poorly positioned and internally-lit fascia signs and the use of metal or plastic materials are particular issues. Overlarge fascia signage obscures the legible proportions of historic façades and neighbouring façades, and often conceals historic fabric or architectural details. The colour, design and branding of some shop signage does not respect the character of either the building or of the historic street scene as a whole.

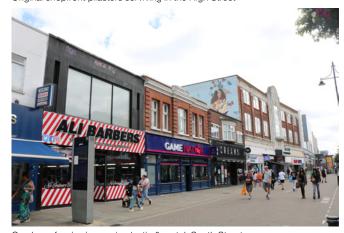
Most shopfronts have had traditional glazing and stall riser arrangements replaced with larger windows without subdivision and stall risers of inappropriate proportions and materials. In some cases, shopfronts extend across multiple units or buildings, obscuring the legibility of historic frontages.

Planning permission is required for alterations or changes which materially affect the external appearance of shopfronts. When opportunities arise, shopfronts and shop signage should utilise design features or patterns that are generally in keeping with historic shopfront proportions and materiality where appropriate; it is noted that a historic shopfront profile may not be appropriate for a Postwar or modern building. Guidance on shopfront design is included in **Section 6.5**.

Additional standalone pavement signage is often employed by local businesses; this generally adds clutter to the street scene and there is opportunity to rationalise the approach to their implementation.



Original shopfront pilasters surviving in the High Street



Overlarge fascia signage in plastic & metal, South Street

### 5.4 Open Spaces and Public Realm

Market Place retains its prominence as the conservation area's key open space. On market days its important historic function, which forms the foundation of the conservation area's significance, remains appreciable and attracts high footfall, while recent hotel and residential redevelopment within the area has the potential to increase market patronage. However, its market use is generally limited and at other times it is used as a car park, when it loses its sense of place historic legibility. There is opportunity to map out and execute a clear strategy for the sympathetic and dynamic use of Market Place moving forward which would enhance the important historic character and use of the conservation area as a commercial hub.

eet furniture is employed throughout the conservation area by way of seating, planters, bins, bollards and cycle racks. This has the potential to enhance the pedestrian exerience, but the amount and design of street furniture in places causes congestion within the street scene, particularly in South Street. This is compounded by the insertion of freestanding wayfinding and advertisement signage and security cameras, and defibrillator stations. There is opportunity to rationalise the design and placement of these elements; any proposed street furniture should be of high quality design and materials which remain sensitive to the historic character of the conservation area.

Recently renewed streetlamps across the conservation area effectively help to demarcate it from its setting. Lampposts should undergo regular maintenance and inspection, and repair when needed.

No historic paving remains within the conservation area apart from granite kerbs and stretches of granite setts which survive in places. Existing paving finishes help to delineate pedestrian areas from mixed-use surfaces. As an array of pavers and patterns have been applied and there is opportunity to rationalise pavement treatments throughout the conservation area to unify its appearance. New public realm surfaces would need to complement area character and be of high quality, durable materials.



Active weekday market in Market Place



An array of street furniture in South Street

### 5.5 Maintenance and Repair of Buildings

The area as a whole remains in active commercial use, with high footfall and commercial tenancy. Individual listed historic buildings are overall in good condition and play an active role in the public experience of the conservation area.

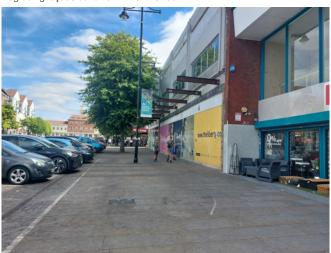
The condition of other historic buildings varies considerably. There are a number of buildings which are suffering from a lack of maintenance or are in need of repair; this is particularly visible at upper floors. Issues include peeling paint to render, deteriorated render, vegetation growth, peeling paint to metal and timber windows, water damage and staining to stone and brickwork, and loss of glazing. It is critical that the causes of these issues are resolved to prevent reoccurrence and further damage.

Dile they await redevelopment, poorly maintained or closed mmercial sites on Market Place dominate the street scene along its southern side and contribute an accordingly greater degree toward a character of decline than smaller vacant shopfronts. There is opportunity for these buildings to take on meanwhile uses to keep their frontages active, pending safe access.

As well as having an impact on physical building fabric, these maintenance and repair issues harm the appearance of both individual buildings and the wider conservation area. There is guidance on good practice maintenance and repair methods in Section 6.4 and additional sources of guidance in Further Information and Sources.



Degrading façade condition in North Street



Vacant frontages in Market Place considerably detract from area character



Brickwork and glazing damage to locally-listed White Hart façade on the High Street

# 5.6 Sustainable Development and Climate Change

The London Borough of Havering intends to be carbon neutral by 2040, and in March 2023 declared a climate and ecological emergency recognising the threats of climate change to the borough. This issue interacts with the conservation area in a number of ways, including changes to buildings and the way people move around the area.

Havering Council have embedded climate change mitigation and minimising carbon emissions throughout the Local Plan, including within its Strategic Objectives and in Policy 12, Healthy communities and Policy 36, Low carbon design and renewable energy.

### Energy Efficiency Upgrades

U

Milst the maintenance and continued use of historic buildings inherently sustainable, there is likely to be both a desire amongst residents and tenants and pressure from government over coming decades to improve the energy efficiency and reduce the carbon footprint of Romford's historic building stock. Reducing heating requirements combined with using more sustainable sources of heat and power are the two main aspects to consider.

There are many opportunities to improve the energy efficiency and reduce the carbon footprint of historic buildings which will have no impact on the character and appearance of the conservation area. These include improving the thermal performance of the building stock through insulating roofs and suspended ground floors, draught exclusion and introducing secondary glazing. Historic and traditionally constructed buildings were designed to be breathable, allowing moisture to naturally exit building fabric. Care needs to be taken to make sure buildings of this type remain breathable, rather than air-tight, through choosing appropriate materials as retaining moisture will harm the fabric of the building.

Care also needs to be taken if external changes are proposed, to ensure they remain sensitive to their historic context. This could include the addition of solar photovoltaic panels on south or east/west facing roofs as an additional heating or hot water source. However, these must not detract from the historic character of the building and are likely to be only acceptable when positioned on rear roof slopes not visible from the public realm. Planning permission will be required for such additions.

#### 5.6.2 Upgrades within the Public Realm

As noted on previous pages, much of the conservation area is already partially pedestrianised, though the parking offered in Market Place regularly brings in a considerable amount of car traffic. Reducing petrol and diesel car use is critical to reducing carbon emissions and there is government commitment to phasing out their sale over the next decade. Petrol and diesel car use will be replaced by a combination of electric (or other carbon-free) vehicles and active, car less travel. Both will require infrastructure changes that will need to be considered in the context of the special interest of the conservation area to ensure they are implemented appropriately.

Electric vehicles require charging points which can be installed within existing car parks and adjacent to street parking bays. Although these are relatively unobtrusive, they are likely to increase visual street clutter to a degree and should therefore be considered alongside other reductions in street furniture clutter. However, lamppost charging points and wireless charging may become viable in the future which and are likely to be compatible with a conservation area environment.

Encouraging active travel, cycling, walking and the use of e-scooters is also key to reducing carbon emissions. Reducing vehicle movement in the conservation area will improve air quality and make active travel more pleasant and safer; this would in turn have a positive impact on the character of Market Place, the conservation area's most important open space. There is a cycle lane along the High Street already in place, and improved signposting for cycling and walking routes could be introduced elsewhere whilst taking care not to add to visual clutter through excessive increased signage. There are clusters of cycle stands located at the north end of South Street, the west end of the High Street and the east end of Market Place, though their form and colour vary. There is opportunity to rationalise this, and ensure that new stands remain sensitive to area character.



Cycle stands at the west end of the High Street

### 5.6.3 Trees and Open Green Spaces

Maintaining existing trees and replacing lost or dying trees are an important part of the strategy to tackle climate change and trees also contribute considerably to the special interest of the conservation area. Street trees help to soften the area's urban grain, and contribute to its sense of place.

Permission is needed for any works to trees above a certain size in the conservation area (see Section 6.3) and justification is required for the loss of any street trees, which should be also be replaced with new trees. A succession planting strategy would be beneficial to ensure existing tree coverage is maintained into the future and opportunities for new trees should also be considered. There is currently a deficiency of green space in the conservation area. Whilst there are limbed opportunities for new green public spaces there are corruntities for linking green corridors and pocket parks as the greening of existing routes with new street trees.



Trees add to the character of the conservation area in South Street

### 5.7 Development Opportunity

As a suburb of greater London, Romford has been identified as a strategic site for new housing by the Mayor of London, and schemes must include strong pedestrian links to area railway stations in an effort to promote sustainable travel. This means that there is considerable pressure for new development in Romford, both within the conservation area and its immediate and wider setting.

This can present a challenge in historic areas such as Romford, where the historic character of buildings and townscape is especially sensitive to change. There are a limited number of sites which have been identified as detracting from the special interest of the conservation area in **Section 4.5**; these present opportunities for the enhancement of historic character through sympathetic redevelopment.

Any proposals for new development both within the conservation area and within its setting should be carefully considered and well designed to ensure that the special interest and character of the conservation area as a designated heritage asset are preserved. Particular attention should be paid to the placement, height, massing and materiality of any proposed development within the conservation area or its setting, also taking important views and the potential impacts of accompanying infrastructure changes into account.

### 5.8 Interpretation and Raising Awareness

Whilst there is a good level of local appreciation for the historic development of Romford, there are opportunities to increase awareness of the special interest of the conservation area, of the responsibilities and benefits of owning a building in the conservation area and the implications of proposing changes to buildings. There are also opportunities to raise awareness of the importance of building maintenance to prevent degradation amongst local owners and occupiers.



#### 6.1 Introduction

Section 6 provides a framework to guide change within the Romford Conservation Area, based on the understanding of its special interest set out in earlier sections of this document. The overarching ambition for the conservation area is to preserve and enhance what is special about it, and thus this is the statutory duty of the Council. This is achieved by ensuring that change and development take place in a considered and sympathetic way, and by raising awareness of and promoting shared responsibility for looking after the conservation area.

The long-term objectives of conservation area management are to phase out past ill-considered changes and additions, and to ensure that new development is of high quality and responds to the conservation area's special character. This applies to very small changes, such as reinstating lost historic features, to proposals for new development both within the observation area and its setting. In addition, the regular maintenance of buildings is a vital part of preserving both their special interest and physical fabric. Repairs can often be necessary; ensuring that these are undertaken sensitively is an important part of looking after historic buildings and the conservation area as a whole.

The following sections set out how and why change within the conservation area is controlled, good practice advice on maintenance and repair and specific guidance on alterations, extension and new development. Specific recommendations can be found in **Section 6.8**.

### 6.2 Planning Legislation, Policy and Guidance

Planning legislation, policy and guidance is utilised when determining applications for development or other changes within the conservation area. This is to ensure that proposals seek to preserve or enhance the area's special interest including the contribution made by its setting.

The primary legislation governing conservation areas is the Planning (Listed Buildings and Conservation Areas) Act 1990. This sets out statutory duties for local planning authorities in managing change within conservation areas. Regional and local planning policy reflect this legislation in the protection and enhancement of conservation areas. See the London Borough of Havering's website for details regarding current national policy regarding the historic environment and the relevant policies set out within the Havering Local Plan.

In addition to legislative and policy requirements there is a wealth of best practice guidance and advice available from Historic England and other heritage organisations. When changes are being considered to buildings within and in the setting of the conservation area, it is often helpful to first seek pre-application advice from the Council to gain early guidance on proposals and discuss any constraints or opportunities; details for this can be found on the London Borough of Havering's website.

Links and details of all the relevant policy, guidance and advice can be found in **Further Information and Sources**.

# 6.3 Control Measures Brought About by Conservation Area Designation

### 6.3.1 Restrictions on Permitted Development

In order to protect and enhance the Romford Conservation Area, any changes that take place must preserve, respect or contribute to the character and appearance which makes the conservation area of special interest. Permitted Development Rights, as defined by *The Town and Country Planning (General Permitted Development) (England) Order* 2015, are works which can be undertaken without the need to gain planning permission. Permitted Development Rights are different in a conservation area, meaning that planning permission is needed for works which materially affect the external appearance of a building.

This includes, but is not restricted to:

- The total or substantial demolition of buildings or structures (including walls of over 1 metre in height, gate piers and chimneys);
- Other partial demolition including new openings in external elevations;
- Works to trees with a diameter of 75 mm or greater, measured at 1.5 metres from soil level;
- Changes to the external finish of a building (including rendering, pebble dash or other cladding);
- Changes to the roof shape including installation of new dormer windows and chimneys;
- Any extension other than a single-storey rear extension of 4 metres or less (3 metres or less if the house is detached or semi-detached);
- Extensions to the side of buildings;
- Any two-storey extensions;

- Erection of an outbuilding to the side of a property;
- Aerials and satellite dishes on chimneys or elevations visible from the street;
- Putting up advertisements and other commercial signage (advertising consent may also be required);
- Changing the use of a building (e.g. from residential to commercial); and
- Installing solar panels that are wall-mounted on a wall or roof facing the highway.

For further information and advice about when planning parmission is required within a conservation area, see the dance on the Government's Planning Portal or contact London Borough of Havering Planning Department. It should be noted that proposals which impact listed buildings, including changes to their setting, may also require listed building consent.

#### 6.3.2 Article 4 Directions

The Council can develop bespoke controls to ensure that specific elements of a conservation area are protected from harmful change. This is done through the application of an Article 4 Direction. These provide additional control by specifically revoking certain permitted development rights, meaning that planning permission needs to be sought before work can be undertaken.

Should the Council wish to do so, the process of implementing any new Article 4 Directions will be undertaken at a future date, separate from the adoption of this CAAMP.

### 6.4 Conservation and the Repair of Buildings

All buildings require maintenance and repair regardless of their age, designation (or lack thereof) or significance. In conservation areas, it is important that such works are carried out sensitively to protect the historic fabric of buildings and preserve the established character of the wider area. The following sections provide a summary of best practice advice on maintenance and repair. Historic England and other heritage bodies, including the Society for the Protection of Ancient Buildings (SPAB), provide a wide range of advice and guidance on how to care for and protect historic places, including advice on their maintenance and repair. See Further Information and Sources for information.

#### 6.4.1 Maintenance

Maintenance is defined as routine work necessary to keep the fabric of a place in good order. It differs from repair in that it is a pre-planned, regular activity intended to reduce the instances where remedial or unforeseen work is needed. Regular maintenance ensures that small problems do not escalate into larger issues, lessening the need for repairs, and is therefore cost effective in the long-term. In general maintenance work does not require consent from the Council, however some maintenance works may require consent.

Regular inspection of building fabric and services will help identify specific maintenance tasks relevant to each building. These could include but are not limited to:

- Regularly clearing gutters and drain grilles of debris, particularly leaves;
- Clearing any blockages in downpipes;
- Sweeping of chimneys;
- Removal of vegetation growth on or abutting a building; and
- Repainting or treating timber or metal windows and other external timberwork.

### 6.4.2 Repair

Repair is defined as work that is beyond the scope of maintenance undertaken to remedy defects caused by decay, damage or use, including minor adaptation to achieve a sustainable outcome, but not involving alteration or restoration. Identification of repairs may arise during regular inspection of buildings or following extreme weather events and could include repairing damage to roof coverings, repointing of brickwork or repairs to windows.

It is important to understand the cause of any damage or defects both to ensure that the repair is successful and to minimise the work that is required. It is also important to understand the significance of the built fabric affected in order to minimise harm when enacting a repair. As with maintenance, consent may be required for some types of repair work; it is advisable to discuss with the Council before any work is undertaken.

The following should be considered when planning repair works:

- Repairs should always be considered on a case-bycase basis. A method of repair which is suitable for one building may not be suitable for another.
- Only undertaking the minimum intervention required for any given repair.
- Use materials and construction techniques which match the existing fabric to maintain the appearance and character of the building. The exception to this is when existing materials or techniques are detrimental to the built fabric – for example, cement pointing on a historic brick building.
- Repair is always preferable over the wholesale replacement of a historic feature.

- If replacement of a historic feature is required for example, if it has degraded beyond repair the replacement should be carried out on a like-for-like basis using the same materials and construction techniques. The replaced element should be the same as the original in terms of material, dimensions, method of construction and finish (condition notwithstanding) in order to be classed as like-for-like.
- Like-for-like replacement should not be applied in cases where a historic feature has previously been repaired using inappropriate materials or techniques. When seeking to improve failing modern features or past unsuitable repairs, a traditionally-designed alternative using appropriate materials is preferable, such as breathable, lime-based renders and paints. In such cases planning permission, and in the case of a listed building, listed building consent, may be required.
- Repairs should, where possible, be reversible, as better alternatives may become available in the future.
- Repointing should always be carried out using a limebased mortar. Within historic and traditionally constructed buildings, cement-based pointing is damaging to brickwork and stonework as it is an impermeable material. Periodic renewal of pointing will extend the lifetime of building fabric.

### 6.5 Proposing Change to Buildings

### 6.5.1 Alteration, Extension and Demolition

The appropriateness of demolition, alteration or extension will be considered on a case-by-case basis, as what is appropriate in one location will not necessarily be acceptable in another. In all cases it is vital to consider the impact of the proposed change on the special interest of the conservation area ensuring that this is preserved or enhanced.

Demolition of buildings that detract from the character and appearance of the conservation area may be beneficial. However, gap sites can also detract from the character of the conservation area, and therefore demolition of whole buildings may only be permitted in instances when rebuilding is proposed, when the site was historically open and this remains appropriate, or when an alternative suitable future use for the site is planned.

Alterations should preserve or enhance the character of the conservation area, and changes should be sensitive to its prevailing architectural and visual character. Alterations may comprise of the removal of detracting features such as uPVC windows, and where appropriate, their replacement with more historically appropriate versions. Alterations should therefore use appropriate materials for their context, and ideally those that are typically found within the conservation area. This may include timber for windows and doors and brickwork for structural elements. New materials may be appropriate as long as they are complementary to the appearance of the area.

Extensions should be subordinate to the existing buildings in their scale, massing and design, and should ensure that any existing historic features remain legible. Extension to the side and front of buildings is unlikely to be appropriate as this would change the visual appearance of the streetscape, whereas extension to the rear, where space allows, is likely to be more acceptable. All extensions should be of high quality design and construction. Whilst the design may use materials and finishes which are characteristic to the conservation area, there may be scope for use of a wider, less traditional material palette where these are part of a high quality, sensitively-designed extension that complements or enhances the appearance of the original building and the conservation area setting.

# 6.5.2 Alterations Proposed in Response to Climate Change

There are many opportunities to make changes to historic buildings in the conservation area which will assist in improving their thermal performance and, as a result, tackle climate change. Internal works in unlisted buildings will not require planning permission; however, for any works which affect the exterior of a building it will be required. Any works to listed buildings, both internal and external, will require listed building consent and those to the exterior will also require planning permission.

Internally, adding insulation to roofs or lofts and below suspended ground floors will improve thermal efficiency, and draft exclusion around windows, doors and vents will also be beneficial. Installing secondary glazing will also improve thermal performance, though it is noted that double or triple glazing may be considered appropriate in some conservation area buildings, pending impacts to the character of the building and wider setting. Care should be taken to ensure that traditionally constructed buildings remain sufficiently breathable to avoid causing harm to the fabric of the building.

Externally, solar panels could be installed on rear roof slopes not visible from the public realm. Where solar panels are proposed to be installed to listed buildings, even on rear roof slopes, listed building consent will be required. Other renewable energy sources could be considered, such as ground, air or water-sourced heat pumps, so long as they do not detract from the character or appearance of the conservation area.

The installation of electric vehicle charging points (EVCPs) will require planning permission, and care should be taken when installing any outlets, conduit, etc. in historic building fabric to avoid unnecessary fabric loss and minimise the visual impact of the EVCP in views from the street. EVCPs often require vehicles to be parked at close range; the impact of on the character and appearance of the street and wider servation area should be carefully considered.

## 2.3 Modern Additions to Historic Buildings

Proposed modern additions to buildings should be carefully considered to ensure they are both necessary and appropriate to the character and appearance of the conservation area. The removal of unsympathetic features such as redundant external wiring, satellite dishes and television aerials should be undertaken proactively, as this will remove visual clutter and thus enhance the appearance of the conservation area. The installation of new television aerials and satellite dishes on a wall, chimney or roof slope that faces onto and is visible from the conservation area public realm (generally to front and side elevations) requires planning permission and is discouraged. The visibility of such features detracts from the appearance of the conservation area; therefore care should be taken to locate these items discreetly, ideally to the rear of buildings.

### 6.5.4 Windows, Doors and Drainage Goods

There have been instances in which uPVC units have been used to replace historic windows. uPVC doors and plastic gutters and drainpipes also found on historic buildings in places throughout the conservation area. Plastic or uPVC elements are not in keeping with the appearance or character of a historic building, and thus detract from the special interest of the conservation area. Therefore, replacement of historic or traditional windows, doors and drainage goods is discouraged unless they are damaged beyond repair. Where such replacement is necessary this should be in materials and styles appropriate to the building. Where inappropriate replacement has already been undertaken, returning these features back to their traditional appearance is encouraged. The proportions and type of window will be dependent upon the age and style of an individual building.

Doors and window frames should be painted in appropriate colours. Changes in colour beyond a shade lighter or darker of the existing colours will likely require planning permission, with decisions based on surrounding context and appropriate historic precedent. Drainage goods would have historically been painted cast iron or lead; however other metals may be appropriate subject to their detailed design.

### 6.5.5 Boundary Treatments

Boundary treatments are applied sparingly throughout the conservation area. Inappropriate or low-quality existing boundary treatments should be replaced when opportunities arise. When new boundary treatments are proposed, these should remain sensitive to the historic character and appearance of the conservation area and avoid introducing clutter to the street scene.

### 6.5.6 Shopfronts and Signage

Retail is an important function at the heart of the conservation area, and therefore the design and appearance of shopfronts is important to preserving and enhancing its character. Changes to shopfronts will require planning permission, and, if part of a listed building, listed building consent. Changes to signage and advertising will require advertisement consent.

A shopfront is part of a building as a whole, rather than being a separate entity. The design of shopfronts therefore needs to reflect the style, proportions, vertical or horizontal emphasis and detailing of the rest of the building, particularly the principal elevation. This is the case for both buildings which historically contained retail at ground floor and where a shopfront has been a later insertion.

Where historic or existing shopfronts contribute to the character and appearance of the conservation area, they should be retained and enhanced where possible. Any historic shopfront features which survive should be retained, repaired as necessary, and incorporated into new schemes, rather than being replaced or concealed. It would be desirable to reinstate historic features, such as corbels and pilasters where these have been lost and the placement of them, or vestiges of their original design, remain.

Where it is appropriate to replace all or parts of a shopfront, traditional styles and materials are likely to be most appropriate in historic buildings, but non-traditional, sympathetically designed shopfronts would be appropriate in modern and new buildings. The replacement of inappropriate modern alterations to shopfronts with suitably-designed traditional alternatives is encouraged. The use of plastic and metal is not considered to be appropriate in historic contexts.

Pilasters, cornices, fascias and stall risers are all important elements in creating the visual proportions of traditional shopfronts within historic buildings; please see sketch opposite for a diagram of these features. Fascias are of notable importance and should be in proportion to the rest of the shopfront; they should not be overly large or extend above or ice level or beyond the corbels on either side. Full height azing is a modern feature and does not reflect the character instoric buildings, though may be considered appropriate in more recent buildings.

design and detailing of advertising and signage content, both on fascias, hanging signs and any free-standing signage, are also important in the conservation area. The signage should complement the design of the shopfront and building, conveying a sense of permanence and quality. Colour palettes, lettering style and illumination need to be considered in the design of a complementary shopfront. With regards to illumination, internally lit signage is generally considered inappropriate within the conservation area context; subtle external lighting is more appropriate. Careful consideration needs to be given to the appropriateness of free-standing signage such as A-boards as these can cause visual clutter and physical impediment to pedestrian movement.

There are examples of fabric canopies within the conservation area and such features can add interest to the street scene if they are of an appropriate design which also considers impacts on neighbouring shopfronts and longer street views. Canopies should avoid obscuring historic features, should be retractable and be made of canvas. Dutch-style canopies, which are visible when retracted, are not appropriate.

Canopies would have traditionally been positioned above fascia signage and this is therefore the most appropriate position for replacement or new canopies; projecting hanging signage will allow the shop name and advertising to remain visible when the canopy is down. Installation of canopies will require consent from the Council.

#### Components of a Traditional Shopfront



### 6.6 New Development

# 6.6.1 New Development within the Conservation Area

Some sites comprise detracting buildings, the sensitive replacement or redevelopment of which could enhance the conservation area's appearance. There may also be opportunities to redevelop buildings which make a neutral contribution to the conservation area. Any new or replacement development needs to take account of, and remain sensitive to, the following:

- The significance of any building proposed for demolition;
- The significance of the relationship between any building to be removed and adjacent structures and spaces;
  - The potential to draw inspiration from the historic use and character of a site;
  - The significance or contribution of any gap site; is it a historic gap within the street frontage or does it detract?;
- The potential impact of proposals on known or potential archaeological remains;
- The potential impact of proposals on the setting of any neighbouring listed buildings;
- The materials and architectural detailing characteristic of the area - these should be a key point of reference in the choice of materials and detailing for proposed new development;
- The scale and grain of the surrounding area, including historic plot boundaries;

- The proposed height of new development in relation to neighbouring buildings and the surrounding context; and
- The potential impact of proposals on important views and the prominence of landmark buildings within the conservation area.

The above list is not exhaustive; each location will present its own unique requirements for sensitive and appropriate proposed development. In all cases, new development must be of high quality design, construction and detailing. The principal aim of new development should be to preserve or enhance the character of its immediate setting and the conservation area as a whole.

# 6.6.2 New Development in the Setting of the Conservation Area

The setting of the conservation area contributes considerably to its special interest, and it has been identified that there are opportunities for new development within this setting. New development should remain sensitive to its location within the setting of the designated heritage asset and enhance or preserve, rather than harm, its special interest. Proposed new development should be of the highest quality design and execution, regardless of scale, in order to achieve this and, where relevant, help phase out ill-considered and unsympathetic interventions from the past.

#### 6.7 Public Realm

The public realm, namely publicly accessible streets and open spaces, is the area from which the majority of people will experience the conservation area. Preserving and enhancing its character and appearance is therefore of considerable importance for maintaining the special interest of the area. The public realm consists not only of street surfaces, but the street furniture, street signs and interpretation.

A sensitive and holistic approach to change and improvement to the public realm within an overarching strategy is needed, including changes to road infrastructure to encourage cycling and walking. Any additions or amendments to the public realm will also need to take account of highways and other relevant regulations.

There are areas where surface finishes could benefit from replacement with rationalised, high quality surface treatments. Care should be taken to ensure future public realm works are considered for the longer term and materials both for street furniture and surface treatments are durable and of high quality, and remain sensitive to the character of the conservation area.

There are opportunities to alleviate the green space deficit in the conservation area through sensitively-design linking green corridors and pocket parks along with new street tree planting.

In addition to street furniture, road signage, freestanding shop signage, broadband cabinets and items such as inappropriately located café seating can collectively cause excessive clutter within the public realm and detract physically and visually from the pedestrian experience of the conservation area. Applications associated with features within the public realm should be carefully considered to make certain that public streets remain pleasant and attractive places to be whilst ensuring that commercial activities can continue successfully.

Installation of vehicle e-charging points are likely to become a feature of the street scene in the near future. Although these are relatively unobtrusive, they are likely to increase visual street clutter to a degree and should therefore be considered alongside other elements of street furniture.

### 6.8 Specific Recommendations

The following recommendations have been developed in response to the issues and opportunities within the conservation area identified in **Section 5**, and in light of the guidance on managing change provided in Section 6 over previous pages. These recommendations are designed to ensure the preservation and enhancement of the special interest of the Romford Conservation Area.

- 01 The historic environment of Romford, in particular that which contributes to the character and appearance of the conservation area, should be maintained to ensure the area remains a desirable place to live, work and visit.
  - Strategies for the long-term and sensitive use of Market Place as an open commercial space which enhance the historic character of the conservation area should be carefully considered.
- Proposals for extension, alteration and new development should preserve or enhance the special interest of the conservation area, or where the public benefits would outweigh any harm. New development should integrate contextual design and prioritize the preservation and enhancement of the area's distinctive character.
- O4 The design, construction and materials of any new development, extension, alteration or repair should be of the highest quality and respect their local context.

- 05 Development within the setting of the conservation area should be sympathetic to its special interest in terms of its scale, massing, proportions, materials and detailing. Applicants proposing new development in the setting of the conservation area should assess and describe the likely impact of their proposals on the significance and character of the Conservation Area and its setting.
- Of Trees which contribute to the character of the conservation area should be retained, or replaced as necessary; opportunities for additional tree planting, linking green corridors and pocket parks and other green landscaping should also be carefully considered, ensuring it is sensitive whilst working to alleviate the current green space deficit in the conservation area.
- 07 Enhancement of the public realm is encouraged including appropriate surface treatments and with potential for integration with heritage interpretation.

- O8 Changes to buildings in response to climate change are encouraged but should take into consideration the character and appearance of the conservation area.
- O9 Careful removal of inappropriate and unsympathetic additions to buildings and the street scene is encouraged.
- 10 Reinstatement of lost historic features, such as timber or metal windows to upper floors or corbels and stall risers on shopfronts within historic frontages is encouraged, where appropriate.
- 11 Replacement of inappropriate modern alterations to shopfronts with suitably designed traditional or sympathetically designed alternatives is encouraged.
- 12 The condition of the conservation area should be monitored and reviewed periodically.

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# **Further Information and Resources**



## **Further Information and Sources**

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#### **Consulted Archives**

Havering Library and Local Studies

Historic England archive

#### **Further Sources of Information**

For further study, the following archives hold material that may be of relevance to the history and significance of Romford:

- Havering Library and Local Studies
- London Metropolitan Archive
- Essex Record Office
- The National Archives
- Historic England Archive

### Legislation, Policy and Guidance

## Legislation, Planning Policy and Best Practice Guidance

The following legislation, policy documents and guidance have been utilised in undertaking the conservation area review and preparing this report.

- Planning (Listed Buildings and Conservation Areas) Act
   1990
- Ministry of Housing, Communities and Local Government, National Planning Policy Framework (2023) (specifically Section 16: Conserving and Enhancing the Historic Environment)

- London Borough of Havering, Havering Local Plan (2016-2031)
- London Borough of Havering, Havering Character Study (August 2024)
- London Borough of Havering Archaeological Priority Area Appraisal (May 2024)
- f Ministry of Housing, Communities and Local Government, Planning Practice Guidance
- g Historic England, Conservation Area Appraisal,
   Designation and Management: Advice Note 1 (Second Edition, 2019)
- h Historic England, Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment (2008)
- i Historic England, Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Second Edition, 2017)
- Historic England Advice Note 18. Adapting Historic Buildings for Energy Carbon Efficiency (July 2024)

### Planning (Listed Buildings and Conservation Areas) Act 1990

Listed buildings and conservation areas are designated under the Planning (Listed Buildings and Conservation Areas) Act 1990 for their special architectural or historic interest. Designation gives conservation areas protection as alterations, additions or demolitions are controlled by the need for planning permission, which is required by local planning authorities when change is proposed. Section 69 of the Act details the protection of conservation areas and is reproduced below, of specific reference is section (1):

### **Further Information and Sources**

'Section 69 Designation of Conservation Areas

- (1) Every local planning authority:
- (a) shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, and
- (b) shall designate those areas as Conservation Areas.
- (2) It shall be the duty of a local planning authority from time to time to review the past exercise of functions under this section and to determine whether any parts or any further parts of their area should be designated as Conservation Areas; if they so determine, they shall designate those parts appordingly.
- The Secretary of State may from time to time determine that any part of a local planning authority's area which is not for the time being designated as a Conservation Area is an area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance; and, if he so determines, he may designate that part as a Conservation Area.
- (4) The designation of any area as a Conservation Area shall be a local land charge.'

#### National Planning Policy Framework (2023)

The National Planning Policy Framework (NPPF) sets out the government's planning policies for new development within England and how these are expected to be applied. At the heart of the NPPF 'is a presumption in favour of sustainable development'. The most recent version of the NPPF was published in 2023 and of relevance to the current review is Section 16 – 'Conserving and enhancing the historic environment', in particular paragraph 197:

'When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.'

Also of relevance are paragraphs 212 and 213:

'Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 207 or less than substantial harm under paragraph 208, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.'

#### Planning Practice Guidance

In 2014 the government launched the Planning Practice Guidance website (https://www.gov.uk/government/collections/planning-practice-guidance). The guidance is a live document intended to provide further detailed information with regard to the implementation of the NPPF. It includes the section 'Historic environment', which advises on enhancing and conserving the historic environment.

### Conservation Area Designation, Appraisal and Management Historic England Advice Note 1 (Second Edition)

This Historic England advice note, published in 2019, supports the management of change in a way that conserves and enhances the character and appearance of historic areas through conservation area appraisal, designation and management. Of great relevance to the review of the Romford Conservation Area are the following paragraphs:

'10 Conservation area designation is undertaken to recognise the historic character of an area and/or in answer to the impact of development, neglect and other threats, on areas which are considered to have special architectural or historic interest. The appraisal is the vehicle for understanding both the significance of an area and the effect of those impacts bearing negatively on its significance. It will form part of the local planning authority's Historic Environment Record and will be part of the evidence base for the local plan and a material consideration in planning decisions.'

## **Further Information and Sources**

'77 Under section 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990 local planning authorities have a statutory duty to draw up and publish proposals for the preservation and enhancement of Conservation Areas in their districts from time to time. Regularly reviewed appraisals, or shorter condition surveys, identifying threats and opportunities can be developed into a management plan that is specific to the area's needs. In turn, this can channel development to conserve the Conservation Area's special qualities. Both areas in relative economic decline and those under pressure for development can benefit from management proposals that promote positive change.'

#### Conservation Principles, Policies and Guidance

Conservation Principles was published by English Heritage (now Historic England) in 2008. It provides a comprehensive mework for the sustainable management of the historic ironment, wherein 'Conservation is defined as the process of managing change to a significant place in its setting in ways that will best sustain its heritage values, while recognising opportunities to reveal or reinforce those values for present and future generations'. The guidance also provides a set of four heritage values, which are used to assess significance. The values are evidential, historical, aesthetic and communal.

### Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Second Edition)

The significance of a heritage asset is not only derived from its physical presence but also from its setting and the surroundings in which it is experienced. The Setting of Heritage Assets (2<sup>nd</sup> Edition) published in 2017 by Historic England provides guidance on managing change within the setting of a heritage asset. It recommends the following staged approach to the assessment of proposals during design evolution under Part 2: Setting and Views:

Step 1: Identify which heritage assets and their settings are affected.

Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated.

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it.

Step 4: Explore ways to maximise enhancement and avoid or minimise harm.

Step 5: Make and document the decision and monitor outcomes.

#### **Contact Details**

London Borough of Havering Planning Department: developmentplanning@havering.gov.uk

## APPENDIX A: LOCALLY LISTED BUILDINGS IN ROMFORD CONSERVATION AREA

ASSET NAME	REFERENCE	AGE	DESCRIPTION	ADDRESS
The Bull Inn	SE18	1920s	Public House in Neo-Georgian design with attractive symmetry. Two storey brick building with Georgian detailing such as strong course, cornice, and pilasters.	Market Place, RM1 3ER
9 Market Place (HSBC)	SE22	1905	HSBC bank in Neo-Jacobean design. Three storeys plus attic, red brick and bath stone construction. High quality decorative stonework and canted bays. Later third bay extension of detrimental impact to building	Market Place, RM1 3AF
Lloyds Bank	SE20	1920s/1930s	Corner building built as a bank. Of brick construction with bath stone plinth and colonnade at ground floor. Attractive example of Neo-Georgian style well displayed on its corner position.	North Street, RM1 3AA
Market Place	SE23	1840s-1910s	Survigin eastern gable of a 19th century building. Timber clad exterior with oriel window on first floor. Two storey building with brick ground floor, rear of building of brick construction. Original building of historic and architectural merit although highly damaged by later alterations.	Market Place, RM1 3ER
Quadrant Arcade	SE30	1935	L-shaped shopping centre of three storeys, facing onto Market Square and South Street. Attractive example of Streamline Art Deco design. Brick building with stone detailing.	South Street, RM1 1NJ
The Co-op Bank	SE21	1932	Three-storey corner building of brick construction with Portland Stone ground floor. Good example of Neo-Georgian design with high quality detailing in fenestration and brickwork.	South Street, RM1 4XP
Prudential Building	SE8	1910s-1940s	Four-storey corner building in Neo-Georgian form. Building is in brick construction and with stone dressing and tile mansard roof. Building faces onto South Street and High Street, forming at attractive corner on a historic crossroad.	High Street, RM1 3RA
The White Hart (The Bitter End)	SE10	1896	Two and half storey brick building in English domestic Revival style. Shopfront altered to detriment of building. Eclectic design incorporating brickwork, woodwork and distinctive dormer windows that break the roofline.	High Street, RM1 1JU
Romford Brewery, High Street, Romford	SE9	1851	Now Havering Museum. Large former brewery of yellow brick construction, now Havering Museum. Prominent feature within the conservation area. Attractive example of 19th century industrial architecture with classical motifs.	High Street, RM1 1JU

## APPENDIX A: LOCALLY LISTED BUILDINGS IN ROMFORD CONSERVATION AREA

ASSET NAME	REFERENCE	AGE	DESCRIPTION	ADDRESS
23-35 High Street	SE7	A row of 6 late-nineteenth century shops. Of brick construction with shop fronting at classical motifs. Fine 19th century detailing such as terracotta clad gables, pilasters delineating bays, hexagonal chimney stacks, and oriel windows. Shopfront detrimento building.  Late-nineteenth century pub. Three storeys of brick construction with stone dressing and slate roof. Mock Tudor timber work in gables. Dental string course run along building.		High Street, RM1 1JL
The Woolpack	SE11			High Street, RM1 1JL
64 South Street	SE24	1912	Neo-Georgian Post Office designed by Albert Robert Myers. Brick construction with fine stone dressing to windows and two flanking stone gables on first storey. Front elevation has fine detailing and a strong example of the Neo-Georgian style.	South Street, RM1 1RB
ີ່ 31 south street (C) (D)	SE29	1937	Neo-Georgian building on prominent corner position. Brick with stone dressings. Large slate roof with deep eaves. Brick quoin detialing at corners. Corner entrance has simple arched pediment.	South Street, RM1 1NX
3-117 South Street	SE28	Post 1947	Three storey brick buildings with white cement pilasters delineating window bays. Shallow fluting in pilasters. Attractive facade with raised central four bays in simple Art Deco style. Ground floor shopfront of lesser quality.	South Street, RM1 1NX
103-111 South Street	SE27	1912-1947	Three-storey, eight bay commercial buildings. Painted cream and white with Art Deco detailing. Ground floor has been altered extensively with Tuscan columns, upper floors of higher artistic design quality.	South Street, RM1 1NX
99-101 South Street	SE26	1914-1947	Three-storey, seven bay-brick building with stone detailings. Projecting central bay with stone pediment at the top. Strong example of early twentieth century commercial design. Shopfront on ground floor altered with modern marble pillars.	South Street, RM1 1NX
97 South Street	SE25	1914-1947	Neo-Georgian style building in gault brick with projecting central window bay on first floor. Two storey, three bay with strong symmetry. Fine Neo-Georgian window surrounds with pediment. Shopfront of lesser and detracting quality.	South Street, RM1 1NX

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## RAINHAM CONSERVATION AREA APPRAISAL AND MANAGEMENT PLAN JUNE 2025







Date	Issue	Revision	Reviewed	Approved
November 2024	01	First Draft	EB	EB
February 2025	02	Second Draft	EB	EB
March 2025	03	Third Draft	EB	EB
June 2025	04	Final	EB	EB

## RAINHAM CONSERVATION AREA APPRAISAL AND MANAGEMENT PLAN

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FURTHER INFORMATION AND RESOURCES



This section provides information about what conservation area designation means and its implications for development. It also gives an overview of the Rainham Conservation Area, sets out the purpose of the Conservation Area Appraisal and Management Plan (CAAMP) and outlines the consultation process that has been undertaken to prepare it.

#### What is a Conservation Area? 1.1

A conservation area is defined as an 'area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance.'01

Designation of a conservation area recognises the unique quality of the heritage of that area as a whole. This quality is derived not only from individual buildings but also other features, including (Du not limited to) topography, grain, materials, thoroughfares, ws, open spaces and landscape. These all contribute to the oric character and appearance of an area, resulting in a distinctive local identity and sense of place.

represent to which a building, or group of buildings or structures, positively shapes the character of a conservation area is derived from its exterior – principally those elevations which are street-facing but also side and rear elevations, the integrity of its historic fabric, overall scale and massing, detailing and materials. Open spaces, whether they are public or private, green or hard landscaped, can all contribute to the special interest of an area. Furthermore, the spaces between buildings, such as alleys, streets, paths and yards, all contribute to a conservation area's appearance and character.

#### 1.2 What Does Conservation Area Designation Mean?

Changes to the external appearance of buildings in a conservation area may require planning permission from the Local Planning Authority, as certain permitted development rights are curtailed. For example, full or substantial demolition of a building will require planning permission and works to trees within conservation areas must be notified to the Local Planning Authority in advance. There are often further restrictions in place in conservation areas through Article 4 directions, which remove certain permitted development rights.

Under the National Planning Policy Framework (NPPF), conservation areas are designated heritage assets, and their conservation is to be given great weight when determining planning applications.<sup>02</sup> Further details can be found in Section 6.

The 2016-2030 Havering Local Plan (adopted in 2021) includes Policy 28. Heritage Assets, which sets out the Council's approach to development impacting heritage assets, including conservation areas and their settings.

#### 1.3 **Rainham Conservation Area**

The Rainham Conservation Area is one of 11 conservation areas in Havering, each distinctly individual in character and representing a variety of the surviving areas from different periods of the borough's past. It was designated as one of the borough's first conservation areas in April 1968.

Rainham retains a hamlet-like character at its core, formed of an intersection of three main roads which later grew to comprise ancillary streets. Its setting north of the Thames is shaped by ancient natural features including streams, marshland and fields which afford the area some separation from denser suburban development to the north and west, further preserving its character.

#### 1.4 **Conservation Area Boundary**

#### 1.4.1 **Boundary Review**

Understanding or appreciation of what is special about an area can change over time. Therefore it is important to review and take stock of the boundaries and character of a conservation area at intervals to ensure that the reasons for its designation are still relevant and evident, and that the proper management of change is in place.

A review of the boundary alongside any accompanying quidance and assessments should generally take place every five to ten years or in response to a notable change (positive or negative), including changes in policy or legislation.

The present-day boundary encompasses the ancient village core, focused on the group of historic buildings that give Rainham its character. This encompasses the buildings and rear garden plots lining the three streets of the village core,

stopping before the railway line to the south, the eastern riverbank of the River Ingrebourne to the west, and the greater part of the Rainham Hall gardens and surviving 18th century buildings to the east, including the Church of St Helen and St Giles, the Vicarage, Redbury, the War Memorial, Rainham Hall and the Lodge. This boundary has not changed since the area was designated in 1968. Two changse to the boundary have been made as part of the preparation of this CAAMP, see the following paragraphs details.

A site inspection of the area found that the conservation area boundary bisected a section of Rainham Hall gardens to the east of the building. As the community garden forms a key feature of Rainham Hall, a National Trust site and one of the conservation area's key historic buildings, the boundary of the conservation area has been extended slightly to the north east to encompass the entire garden along its northern and eastern plot boundary. This is indicated by the solid red line on the adjacent boundary map.

Additionally, the conservation area has been altered to omit the section south of Viking Way, which included two mid-to-late 20th-century structures. This decision follows a thorough site assessment and examination. The buildings in question were deemed incongruous with the overall character of the conservation area due to differing materiality, form, and age. Furthermore, they are isolated from the main conservation zone, lacking any connecting roads within the designated area. Consequently, their removal has been deemed appropriate to maintain the overall cohesion of the conservation area.

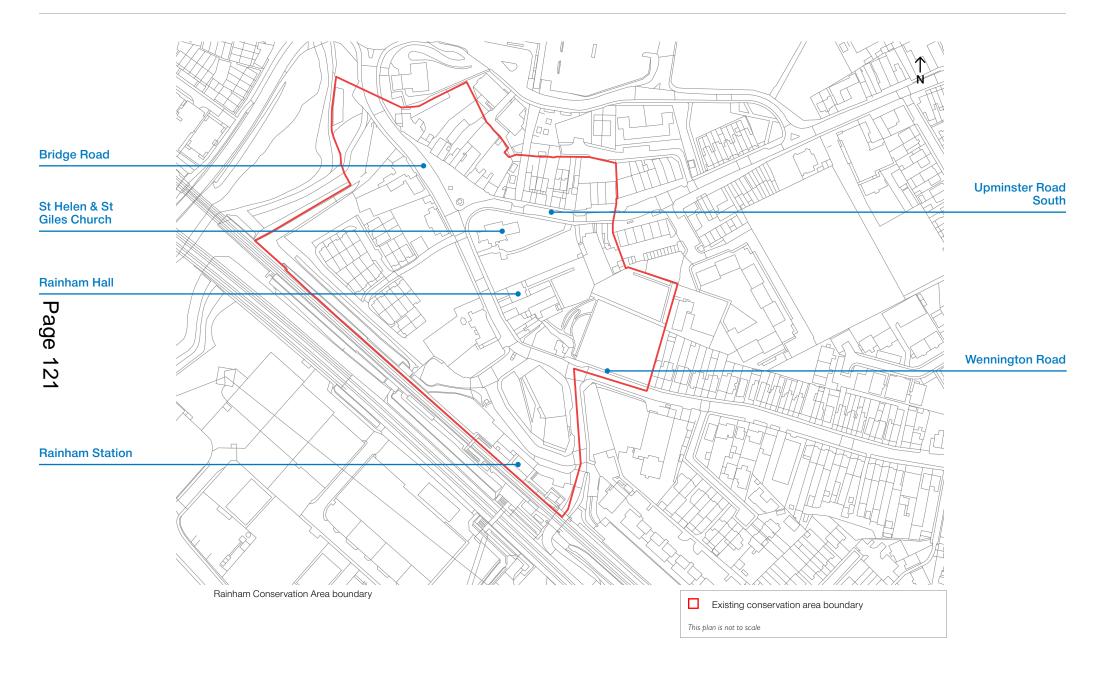
These updates are reflected on the Rainham Conservation Area Boundary map on the following page.



View north across part of the Rainham Hall Gardens. The existing boundary divides this space roughly from the pathway at the far right of the photo.



The northern part of the Rainham Hall Gardens is occupied by a large vegetable garden, open to visitors.



## 1.5 Purpose and Scope of the Conservation Area Appraisal and Management Plan

Understanding the character and significance of conservation areas is essential for managing change within them. It is therefore a requirement under the *Planning (Listed Buildings and Conservation Areas) Act* 1990 that all Local Planning Authorities 'formulate and publish proposals for the preservation and enhancement' of conservation areas within their jurisdiction, and that conservation areas are periodically reviewed.

These proposals are normally presented in the form of a CAAMP, which defines and documents the special interest of conservation area (see Section 2), analyses the Characteristics that make it special (see Sections 3 and 4) the issues and opportunities that the area faces (see Section 5), and sets out a plan for managing change to consure its ongoing protection and enhancement (see Section 5).

This CAAMP has been prepared in line with current best practice guidance published by Historic England, the government's heritage advisor and the public body which manages the care and protection of the nation's historic environment.

This document is intended to be comprehensive, but the omission of any building, structure, feature or space does not imply that the element is not significant or does not positively contribute to the character and special interest of the conservation area. The protocols and guidance provided in **Section 6** are applicable in every instance.

The assessments which provide the baseline information for this CAAMP have been carried out using publicly available resources and thorough on-site analysis from the publicly accessible parts of the Rainham Conservation Area.

#### 1.6 Consultation and Engagement

It is a statutory requirement under Section 71 of the *Planning* (*Listed Buildings and Conservation Areas*) Act 1990 that conservation area guidance produced by or on behalf of the Local Planning Authority be subject to public consultation, and for the Local Planning Authority to have regard of the views expressed by consultees.

Initial consultation was undertaken with key stakeholders, including the London Borough of Havering Planning Team, at early stages of the CAAMP drafting process to raise awareness of the conservation area review and utilise local understanding of the area's special interest.

A draft of this CAAMP underwent public consultation from 28th April to 9th June 2025 including a public event. Comments received from this consultation have been incorporated into the final CAAMP as appropriate.

# 2.0 Summary of Special Interest



## 2.0 Summary of Special Interest

Rainham's special interest is drawn from its ancient settlement at the banks of the Thames marshes and River Ingrebourne, and the historic village buildings associated with its development and prosperity as a marshland hamlet.

This village character remains at the heart of Rainham, which has been shaped over time by a setting along rivers and marshes that is key to understanding the conservation area's historic development. These natural features have afforded a degree of protection from encroaching suburbia at the outskirts of London, providing Rainham with an air of seclusion which survives today.

The conservation area's core of high-quality historic buildings, including its largely unaltered Norman church, is not only architecturally significant but also illustrative of the village's eras of development tied to its association with riverside trade from the medieval period onward.

Historic public houses mark entrances into the village from the east and west, while shopfronts largely retain their period character and are occupied by independent traders, adding vibrancy to the village centre. Historic houses belonging to once-prominent local residents also feature within the streetscape. A network of pathways across and into the conservation area creates strong spatial links across the village. These help illustrate Rainham's historic layout and contribute kinetic views of its historic buildings, the River Ingrebourne and the wider setting. Trees are mature and plentiful across the area within private gardens, the churchyard of St Helen and St Giles, along the river and across Rainham Hall gardens. These contribute to the area's historic character and soften the urban environment. Together these elements allow Rainham's historic village character to remain prominent, and underpin the conservation area's special interest.







Church of St Helen and St Giles

## 2.0 Summary of Special Interest



View of the parish church tower, looking northwards from Railway View.



Village centre, the War Memorial in the foreground.



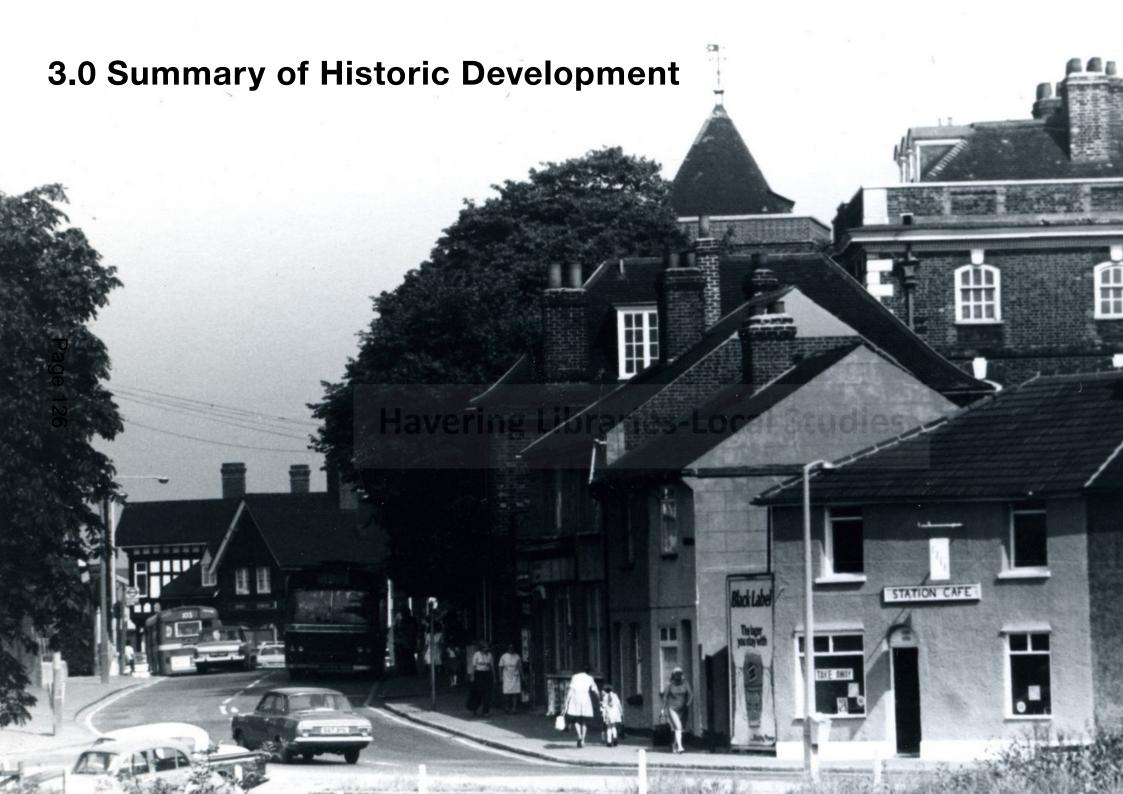
View southwest across Rainham's centre.



Upminster Road South looking east, the trees from the parish churchyard to the right of the photo.



View of Rainham Hall from its own gardens, looking south.



#### 3.1 Timeline

Settlement in Rainham grew up on the edge of the riverside marshes, near to a River Thames crossing from the **Bronze Age.** 

#### 12th Century

A ferry established between Rainham and Erith in Kent.

#### c. 1160-1178

Parish church of St Helen and St Giles built.

#### 1670

By 1670 there were 44 houses recorded in the parish, clustered around the churchyard.

#### 1729

London merchant John Harle dredged the tributary to Rainham, expanding the creekside wharf to allow ships to Sail up to Rainham proper, and erected Rainham Hall.

#### 1850s

London Tilbury & Southend Railway was laid in the 1850s, Rainham Station opened in 1854, bringing Victorian suburban development.

#### 1920

The Havering memorial to those lost in the First World War was raised in Rainham centre.

#### 1930s

The industrialisation of the Thames marshes and the suburban expansion of London meant Rainham became a nucleus to dormitory suburbs.

#### Mid-20th Century

Development included construction of new library, council offices and housing.

#### 1968

Rainham Conservation Area is established.

#### 1994

Retail superstore built north of Rainham centre.

#### 2012

Public realm schemes include rerouting roads through centre.

#### 2014

Rainham Library is relocated adjacent to the railway station, its former site replaced by housing.

#### 3.2 Early Rainham

Remains dating to the Neolithic, Iron Age, Romano-British and Anglo-Saxon periods have been found in the area surrounding Rainham, suggestive of a continuous settlement in or near to Rainham from the Bronze Age onward. Discovered relics from the Saxon period indicate the presence of residents of some importance, and support one theory behind the village's placename - Roeginga-ham, or 'settlement of the ruling people.'03

The settlement developed as an important landing point for a river crossing to Kent, and on a principal roadway leading east from London along the northern banks of the Thames.

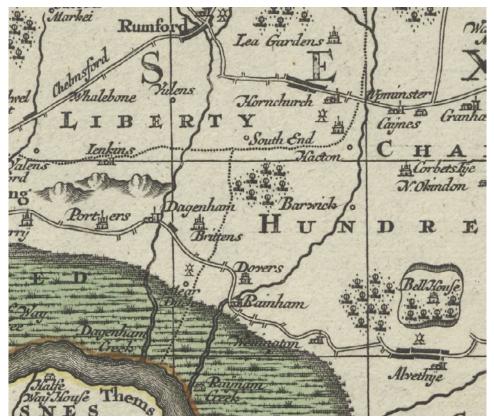
The village was located at the point the main London Road assed the River Ingrebourne, on a spit of higher land that arated the Ingrebourne, Rainham Creek and the Rainham Marshes. A 'short' river-crossing ferry was established impediately south of the hamlet in the 12th century, taking ressengers to and from Erith in Kent, with the expansive marshes between the river and the hamlet providing excellent grazing for livestock awaiting transportation. Intensive river traffic over the medieval and early modern ages spurred the development of wharves employing workers in the water trade. Public houses were established in Rainham village to cater to the burgeoning local economy.

The parish church of St Helen and St Giles was built somewhere between 1160 and 1178, the tower and embattlements added in the 16th century. The church is the conservation area's only surviving medieval building, however timber framed cottages at no.2-8 Upminster Road and the Vicarage are believed to date to the 17th century. The latter was then fronted in brick in 1710.

#### 3.3 18th Century Growth

Rainham's prosperity expanded in the early 18th century when London sea merchant John Harle acquired its wharf and dredged the Ingrebourne to sail ships directly to the centre of Rainham. Following the success of his business in the London coal and grain trade, Harle built Rainham Hall and its associated outbuildings in 1729. A series of other conservation area buildings date to this period of prosperity, including Redberry House, the vicarage and smaller properties such as No.12 Broadway. An earlier iteration of the Pheonix public house, the Bell Inn and the Angel public house were all in situ by c.1720-30.

Lotter's map of 1760 recorded Rainham as an established settlement on the road into London, north of the marshes bounding the banks of the Thames. Lessees of the wharf were recorded from the late-18th century onward, and in 1801 Rainham was described as 'the grand lodging and landing place for the whole mercantile goods of that part of the county.' (please insert footnote as Powell, 1978, p. 134-138.). The wharf continued to serve area market garden trade providing transport of goods into London well into the 19th century.



1760 map of London and its surrounds by T. C. Lotter, showing Rainham due south of Romford along the marshes.

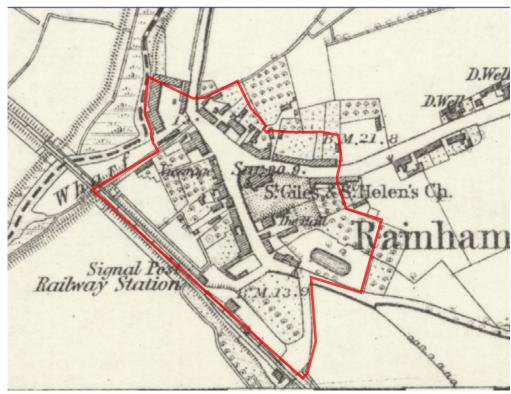
#### 3.4 The 19th Century Village

Rainham remained a modest village until the arrival of the railway in 1854 when its suburban development gradually began. A post office and telegraph office followed shortly thereafter in the early 1870s, serving a population which had reached 868 by 1868, with initial premises near to Rainham Station. The adjacent 1862 Ordnance Survey map shows

ribbon development along main roads east of the wharf and northeast of the railway line, with market gardens to the rear of plots. St Giles & St Helen's Church was situated in a generous churchyard at the village's principal intersection, with Rainham Hall noted to the south.



At the turn of the 18th century the small Rainham settlement clustered around the church and river wharf. A circle indicates the rough location of the future conservation area.



1862 Ordnance Survey map illustrating development by the mid 19th century, indicative conservation area boundary shown in red (National Library of Scotland)

Late 19th-century development saw the construction of terraced housing to the east of the village centre and north of the railway line along Broadway and the Upminster Road, while residential properties overlooking the centre were altered to incorporate ground floor shopfronts. Purpose built commercial ground floor units with residential accommodation above had also begun to infill open land closer to the village centre, in some cases replacing individual dwellings

and farmhouses overlooking the village square; No.26-28 Broadway was rebuilt c.1897 in this style. The Phoenix public house was rebuilt along the west side of Broadway following a fire in the 1890s, with the result visible in the photograph below left.



The rebuilt Phoenix Hotel c.1895-1900, with a view of Broadway. (Havering Libraries Local Studies)



A late-19th century view across Rainham Centre towards the church, behind which Rainham Hall is visible. A sign for the old Angel Inn hangs to the right of the photo. (Havering Libraries Local Studies)

#### 3.5 Rainham in the 20th Century

Commercial buildings with purpose-built ground floor shop fronts and the rebuilding of several pubs continued to shape Rainham centre prior to the outbreak of the First World War in 1914. Ground floor shops were added to the front of Nos.9-27 Upminster Road South c.1900-1905, while Nos.18-24 (even) Bridge Road were erected in 1907, and the Angel and the Bell public houses were rebuilt in 1906 and c.1900, respectively.

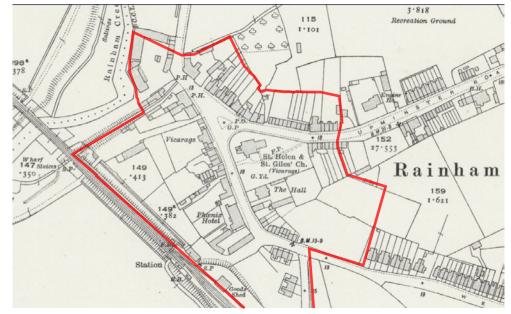
The profitability and prominence of Rainham Wharf by the early 20th century was much reduced, having declined steadily over the second half of the 19th century after the trainline had disrupted its primacy as a trading post. The marshes between Rainham and the River Thames were sold to the War Office in 1906 and turned into a rifle range, and an industrial site near to the marshes was adapted for use as a remittions facility during the First World War. A memorial to see lost in the War was erected in Rainham centre on 7th November 1920, the first such memorial in Havering. Its three door kfaces were designed to face the three main roads from Rainham Triangle: the main road to London, the road leading to Southend and the Upminster Road South.

The bucolic village briefly became a destination for London day-trippers before the area was industrialised over the 1930s with the arrival of the Dagenham Ford Factory on marshland to the west of Rainham. This corresponded with a decline in prosperity associated with the slowing of shipping commerce.

The suburban expansion of London reached Rainham after the end of the Second World War, when the village became the nucleus of a dormitory suburb which grew up around it.



A 1905 photograph of Nos.9-27 Upminster Road South with newly built ground floor shopfronts. (Havering Libraries Local Studies)



1915 Ordnance Survey map, indicative conservation area boundary shown in red

<sup>04</sup> Havering Libraries (2021) 30 March. Available at: https://www.facebook.com/HavLib/posts/daldys-wharf-rainham-creek-rainham-c1900-1910the-victoria-county-history-essex-v/3785777368136952/. (Accessed: 24 October 2024)

Over the 1960s and 70s a Rainham sewer system was developed and the roads repaved. A library and council offices were built in 1967 south of Broadway, overlooking the main square. Rainham Conservation Area was established in 1968 and the following year, Rainham Wharf was closed, after which the River Ingrebourne in its path near the village gradually silted up.

In the 1970s several tall council apartment buildings and commercial units were built to the northeast of the church along Upminster Road South, and a large supermarket and associated carpark were built north of the centre in 1994. In 1998/9 the Rainham Creekside Path was opened, using some of the site of the old Rainham Wharf to create an open green space. <sup>05</sup>

Apublic realm masterplan for Rainham village was completed in 2013, aimed at improving the spatial relationships between arts of the village. This involved the adjustment of roads within the central square to form a large pedestrianised space around the war memorial, improved pedestrian routes between Upminster Road South and the Tesco site to the north, and an improved riverside walkway next to River Ingrebourne. <sup>06</sup>

The new Rainham Library was opened in 2014, accompanied by a bus interchange and improved public realm between it and the station. The old library site overlooking the square was subsequently redeveloped for housing, with some homes occupied, some under construction at the time of writing.



View of the town centre, looking east towards the church and war memorial, the Bell and the Angel framing either side of the road. The old road pattern around the war memorial is visible, reconfigured c.2013 (Havering Libraries Local Studies)

<sup>05</sup> Havering Libraries (2021) 30 March. Available at: https://www.facebook.com/HavLib/posts/daldys-wharf-rainham-creek-rainham-c1900-1910the-victoria-county-history-essex-v/3785777368136952/. (Accessed: 24 October 2024)

<sup>06</sup> Havering Libraries (2021) 30 March. Available at: https://www.facebook.com/HavLib/posts/daldys-wharf-rainham-creek-rainham-c1900-1910the-victoria-county-history-essex-v/3785777368136952/. (Accessed: 24 October 2024)



#### 4.1 Location, Topography and Geology

Rainham village is situated at the southern end of the London Borough of Havering, an area within the London Basin. It is approximately 15 miles east of London city centre, and one mile northeast of the River Thames. The medieval market town of Romford lies just over five miles to the north.

The village core is formed at the meeting of Upminster Road South, Bridge Road and Broadway, adjacent to a historic small river crossing of the River Ingrebourne, and north of the Rainham Marshes. The River Ingrebourne is now mostly silted up, while the Rainham Marshes are partially occupied by industrial estates and partially given over to nature reserves.

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- Rainham Conservation Area
- 01 Rainham Leisure Centre
- 02 Upminster Road South
- 03 Rainham Hall
- 04 Wennington Road
- 05 Rainham Station
- 06 St Helen & St Giles Church
- 07 River Ingrebourne
- 08 Bridge Road

This plan is not to scale



Aerial image of Rainham Conservation Area location in its wider context. The conservation area boundary is indicated in red (@ Google Earth)

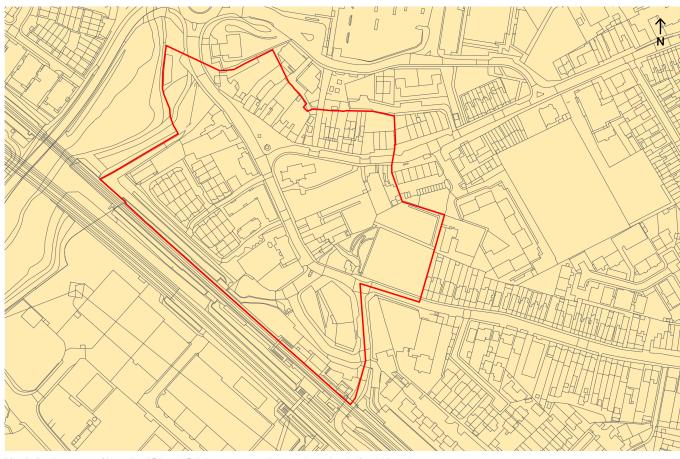
### 4.2 Archaeology

The entire conservation area is covered by Havering Archaeological Priority Area 2.22, which is centred on the historic village. The Rainham APA is designated principally as it has potential to contain archaeological deposits associated with successive phases of medieval and later settlement activity.<sup>07</sup>

There are no scheduled monuments within the conservation area or its immediate setting.

Further information can be found by consulting the Archaeological Priority Area Appraisal written by Oxford Archaeology in 2024 for the London Borough of Havering, available online.

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Map indicating extent of Havering APA 2.22 Rainham, conservation area boundary indicated in red

Oxford Archaeology (2024) 'Archaeological Priority Area Appraisal: London Borough of Havering'. Available at: chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.havering.gov.uk/downloads/file/6708/havering-archaeological-priority-areas-report

#### 4.3 The Setting of the Conservation Area

The setting of the conservation area is dominated by suburban built development to the east, large retail and leisure developments to the north and west, and marshlands and industrial parks to the south.

The railway line is a dominant visual and physical boundary between the conservation area and the marshland and industrial parks to the south, screening views of the latter completely from within the conservation area apart from views of its tall electricity masts.

Modern suburban development dominates wider setting to the west and north west, but is separated from the conservation and by the River Ingrebourne and roadways and further eneed by mature trees.

Large retail and leisure facilities and associated car parking have infilled land to the immediate north, linked to the village core through a series of well-designed wayfinding paths, and screened from views within the conservation area by the tight plot layout to the north of Upminster Road South. Public realm works at the northern edge of the boundary soften the break between conservation area and retail park.

Upminster Road South and Broadway extend straight eastwards, lined by two-storey 20th century suburban housing.



View southwest along southern conservation area boundary, with railway line to left & new housing to right.



Suburban terrace houses demarcate the eastern end of the conservation area boundary along Broadway.



View westwards out of the conservation area along the A road.



View of the retail and car park to the north of the conservation area. The pedestrian route into the village centre can be seen to the far left of the photo.

#### 4.4 Important Views

The small size of the conservation area and generally low-lying topography impedes long-range views into and out of the centre of Rainham, limiting important views within the conservation area to those into and out of its central triangle. Otherwise the conservation area is experienced via incidental and kinetic views which change as one moves along its three main streets, or along pathways through town. These views include those of landmark buildings, including glimpsed views of the St Helen and St Giles church tower at the heart of the village.

All views which take in heritage assets, whether or not they are designated, are considered important and contribute to the understanding and experience of the conservation area. Consequently, the views considered in this section only an indicative selection and are not intended to be comprehensive set. Important views within the Rainham Conservation Area include those looking inward into the conservation area from its setting, those looking across the thangle at its historic core, views across the St Helen and St Giles churchyard at the centre of the village, and views across Rainham Hall gardens. These are illustrated in adjacent photographs and on landmarks map in Section 4.5.



View into Rainham from the western conservation area boundary, framed by the Bell and Angel Inn to the war memorial and church beyond.



View east across Rainham village triangle, including the war memorial and the parish church.



View west across Rainham triangle, past the war memorial toward Bridge Road.



View north across the parish churchyard, the rear of No.2-8 Upminster Road in the middle distance.



View west across Rainham Hall gardens, towards the village core.



View west along Broadway toward the village core, with the Phoenix pub to the left and Rainham Hall grounds to the right.

#### **Key Buildings and Spaces**

A conservation area is often best experienced by taking in its historic buildings and spaces, as the majority of these contribute to the understanding of its special interest. However, there are individual buildings and spaces which play a more important role in establishing the character of the area, and are considered to be landmarks.

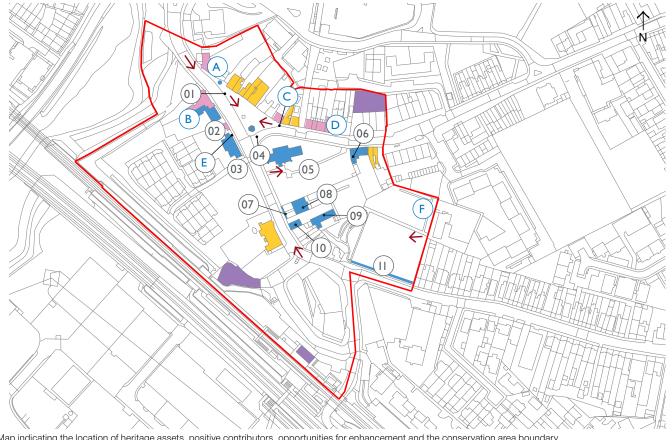
Rainham's landmarks are generally either statutorily listed heritage assets or locally listed buildings, while several others also make a positive contribution to the area's historic or architectural character. These are identified on the plan opposite, as well as the conservation area's important views identified in Section 4.4.

A jumber of buildings or sites within the conservation area description of the control of the co the character and appearance of the conservation area; their ingrovement or replacement is encouraged. Ö

#### 4.6 **Townscape and Spatial Analysis**

The conservation area is centred on the meeting point of three major historic thoroughfares, Broadway, Upminster Road South and Bridge Road.

Streets and plot form around these three main roads reflect the gradual expansion of built form, densely packed with principal street frontages set around large plots of principal civic or private property, the church yard, Rainham Hall and Redbury House. Public and private open spaces help the area to retain its historically spacious feel, despite the dense development surrounding the area.



Map indicating the location of heritage assets, positive contributors, opportunities for enhancement and the conservation area boundary.

- → Key Views Proposed 2025 Boundary Positive Contributor Opportunity for Enhancement Statutorily Listed Heritage Assets
  - K6 Telephone Kiosk (Grade II) Redbury (Grade II)
  - The Vicarage (Grade II)

- 04 War memorial (Grade II)
- Church of St Helen and St Giles (Grade I)
- No.2-8 Upminster Road South (Grade II)
- 07 Forecourt railings, gates and piers walls and vases at Rainham Hall (Grade II\*)
- 08 Rainham Hall (Grade II\*)
- Stable Block at Rainham Hall (Grade II\*)

- 10 The Lodge and Rainham Hall (Grade II\*)
- 11 Wall and gate piers to Rainham Hall between number 15 and 37 (Grade II)
- Locally Listed Buildings
- The Bell Public House
- The Angel Inn 12 Broadway
- 9 to 27 Upminster Road South
- 27A Broadway, Outbuilding to Vicarage.
- 2025 Extension to the Conservation Area boundary.

This blan is not to scale

### 4.7 Open Space and Trees

There are a series of publicly accessible, historic open green spaces within the centre of Rainham, its suburban expansion and modern infill having remained largely outside of the historic core. Principal public open spaces within the conservation area include:

- St Helens and St Giles Churchyard
- Rainham Hall Gardens
- River Ingrebourne Creek-side Park





View of St Helens and St Giles Churchyard



Views of community gardens attached to Rainham Hall, open to the public for free at regular intervals throughout the week.



View of park above Ingrebourne Creek, off Bridge Road.



View of River Ingrebourne Creek-side Park

There are relatively few street trees within the conservation area due to plots arranged close to the road. Mature trees within the public green spaces, as well as those lining the railway and those within private gardens behind street facing buildings are therefore important features of the townscape,

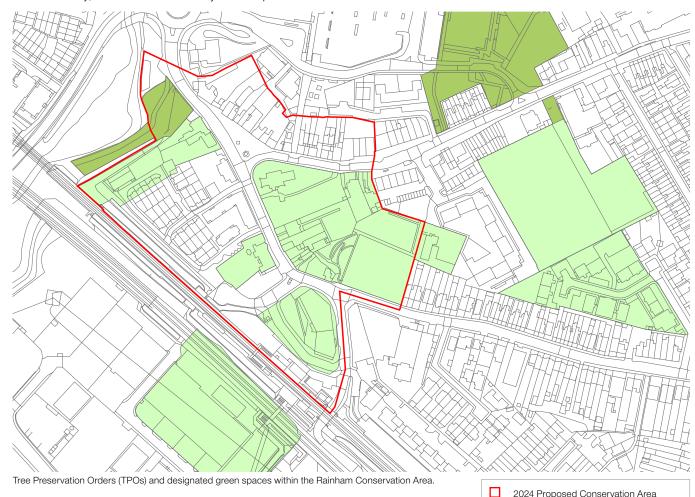


Vipy west across the village centre, with foliage from churchyard trees on the lettrand trees within the Creek-side Park visible in the distance.



Trees help to obscure views of the railway along the southern conservation area boundary.

as they provide verdant backdrops and help to soften views of railway or electricity pylons set beyond the conservation area boundaries. Tree Preservation Orders (TPOs) are designated across a considerable number of plots within the conservation area boundary, as indicated on the adjacent map.



Tree Preservation Orders
Designated Green Space

This plan is not to scale

#### 4.8 Public Realm

#### 4.8.1 Key Features

A generous, roughly-triangular 'square' lies at the heart of the conservation area, formed by the meeting of its three principal roads, which provides a key feature of area public realm. The space was created in c.2012, when roadway to the rear of the war memorial was infilled and pedestrianised. This area is laid with modern stone pavers and provided with seating, planters and cycle bays which encourage dwell time and generally contribute positively to the character of the centre, despite sparse planting.

Pedestrianised or shared use links between Upminster Road Stath and the shopping centre to the north, and public realm ween the 2014 library, bus depot and railway station to south have been similarly provided with planters or young trees. The link to the north has art installations on brickwork to be sides of buildings in addition to planters, which serves to often the otherwise urban environment and contributes positively to the character of the links, encouraging active footfall.



View of the central 'square' looking west along Bridge Road, the war memorial visible at the far left.



View of public realm between the library, bus depot and railway.



View into the conservation area via a pedestrian link between Upminster Road South and the shopping centre to the north. Temporary planters and mature trees within private gardens on either side, and views of treetops in the churchyard above the roofline soften the visual link.

#### 4.8.2 Street Surfaces

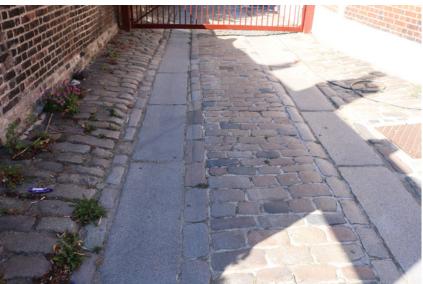
Street surfaces throughout the conservation area are in tarmac with stone or granite kerbs.

Pavement materials vary more widely throughout the conservation area. Utilitarian surface treatments including tarmac and concrete pavers prevail on pavements away from the centre, and while in generally decent condition detract from the character of the townscape.

Pavements laid with flags and large paving stones prevail around the centre and streets surrounding Rainham Hall and the church. Modern polychromatic brick pavers and granite setts survive in driveways have been used to articulate sections of new pavement. Modern textured pavers have been laid to demarcate level access pedestrian crossings, or king kerbs.



Stone pavers adjacent to the churchyard, granite kerbs indicating section of extended pavement from 2012 rearrangement of roadway.



Detail of historic setts on off-street entrance to Redbury House.

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# 4.8.3 Street Furniture, Lighting and Wayfinding Street furniture is found throughout the conservation area, indicative of its character as a town centre.

Seating, bike hoops, planters and other furniture that encourages dwell time is clustered within open areas where wide pavements or dedicated land allows it: within the churchyard, the pedestrianised section of the town centre, near to the library and in the creek-side park. Their profiles vary, and their materials include stone, wood, or black plastic.

Street lighting is modern throughout the conservation area. Streetlamps are in a traditional profile through, except for within the new housing development south of Bridge Road, where they employ a contemporary design. Historic metal lards on the pavement edge are prominent throughout the conservation area. Some modest wayfinding signage has been introduced within the town centre via metal signposts and small, circular metal plaques embedded in stone pavers around the centre, indicating the historic locations of local services.



The village centre comprises a variety of street furniture.



View of seating within the churchyard, Rainham Hall visible in the background.



Interpretive plaques embedded in modern stone pavers around the centre.

#### 4.9 Building Uses

Building uses throughout the conservation area are typical to that of a modest village centre. Most buildings are in commercial or mixed use comprising ground floor shops or restaurants with offices or flats above. Exceptions within historic buildings include St Helen and Giles church, Rainham Hall, currently in cultural use as a National Trust site, and the area's public houses.

There are a handful of solely residential historic buildings, as well as the recently-built housing redevelopment south of Bridge Road. A new residential and civic complex including Rainham library is sited just north of the railway station near the conservation area's southern boundary.

#### 4.00 Boundary Treatments

undary treatments throughout the conservation area are lotted, but those to historic properties have a considerable impact on the appearance of the townscape. Both Rainham and St Helen and St Giles churchyard have robust, hardsome brick garden walls which provide them with visual separation from the street and an air of privacy. The wall between the two properties also makes a strong visual impression along the path leading northward through the churchyard.

The Vicarage and Redbury are given more delicate treatment, set behind railings on brick plinths which allow their façades to remain fully visible from the street. Iron railings also offer protection to the war memorial at the village centre.

The new housing development opposite the church and Rainham Hall includes tall brick boundary walls which are a nod to their historic neighbours. Elsewhere modern boundary treatments tend to comprise utilitarian metal fencing at the conservation area's outer limits.



Boundary wall between Rainham Hall & the churchyard offers picturesque separation



Iron railings at the Vicarage

#### 4.11 Scale and Massing

Buildings within the conservation area are generally two to three-storeys in height beneath pitched roofs, often with additional attic storeys with dormer. Modest buildings are often arranged in terraces. Grander buildings such as Rainham Hall and Redbury House are markedly taller with more prominent massing.

Commercial and residential building terraces along Upminster Road South are more compact in scale and massing, with longer terraces contributing to consistent frontages in street views. Larger, freestanding forms found across residences and public house premises along Bridge Road and Broadway and the St Helen and St Giles church add variety to the historic centre.

#### 4.12 Materials

The use of red and brown brick characterises the conservation area, with stone and other materials intermixed. The use of render on principal façades is also prevalent, particularly along the northern side of Bridge Road and Upminster Road South.

#### 4.12.1 Brick

Red, brown and occasionally use of stock brick is the predominant building material used across the conservation area on buildings from the 17th century onward.

#### 4.12.2 Stonework

Stone is used as decorative detailing on prominent historic buildings within the conservation area, specifically at Rainham and to the war memorial within the centre.



Varied finishes are found across the centre, the war memorial in the foreground, Grade II

The church is the conservation area's most prominent building, and the only one to be built of stone, more specifically rubble. It also features brick sections within the tower, and timber porches.



Varied roofline forms and materiality at the Phoenix public house.



Detail of decorative stonework deployed at Rainham Hall, Grade II\*



Rubble and brick employed at St Helen & St Giles church, Grade I

#### 4.12.3 Other Finishes

Render and roughcast have been applied to entire brick frontages in several instances throughout the conservation area. In some instances, such as with sections of The Bell and Angel public houses, it has formed part of the early 20th century mock-Tudor timber framing. Several instances of render application along the northern side of Bridge Road and Upminster Road South, either on early 20th century commercial edifices, over older frontages, or localised rendering of details such as door surrounds, contributes to a great deal of variety in frontage materiality.

Traditional weatherboarding has been retained or reinstated at a single-storey eastern extension to the Old Vicarage on Broadway, and at 2-8 Upminster Road South, the latter as part of a 21st century renewal project.

# 2.4 Roofs

Roofs to historic buildings are generally finished in terracotta tile or slate, with an occasional roof replaced with modern tile. Chimneys form an important part of the roofscape, each varied in height and massing according to the varied age of the building stock, and provide lively visual interruptions within a characterful roofline framing the conservation area.



Detail of traditional weatherboard and roofline of No.2-8 Upminster Road South, Grade II.



View west across the centre, encompassing varied roofscape within the conservation area.

#### 4.13 Architectural Types

The historic architectural types most prevalent throughout the conservation area include modest, commercial terraces, semi-detached and detached houses. Standalone local landmarks punctuate these, such as the church, Rainham Hall and public houses. This contributes to the conservation area's wider architectural character as a prosperous 18th to 19th century village.

#### 4.13.1 Commercial and Professional Buildings

A wide range of commercial and professional buildings which date from the late-18th to the late 20th century line Bridge Road, Upminster Road and Broadway. There is a high proportion of residential buildings with ground floors converted into shopfronts in the late 19th and 20th century, with one or two-storeys above, as well as purpose-built in this mixed-use arrangement. Examples of the former include the late Victorian ground floor shopfront extensions to no.9-27 Upminster Road South, and examples of the latter include the three-storey No.26-28 Bridge Street. There is very little modern commercial development within the conservation area, limited to a short range of late 20th century commercial buildings which occupy the north side of Upminster Road South. Commercial frontages are generally simple, in brickwork with brick dressings and plastered, pebbledash or stucco fronts. There is one example of timber boarding, a modern replica of historic design, used at no.2-8 Upminster Road South.

#### 4.13.2 Shopfronts

Shopfronts to historic commercial buildings across the conservation area consist in the most part of late 19th or 20th century design, forming converted ground floor additions to residential houses, although there are instances of purposebuilt ground floor units. These are all largely traditional in design, reflecting the late Victorian practice of recessed entrance doors, panelled stall risers, large shopfront windows and over lights. Pilasters with capitals also remain consistently legible. Shop signage is generally in keeping with the historic setting; examples include painted brickwork at The Lodge (Grade II) and painted timber fasciae, although there are some examples of inappropriate, backlit modern shop signs. The shopfronts within the late 20th century range at No.31-30 Upminster Road South are modern, with large shopfront widows and metal framed entrances.

# 4র্ব3.3 Public Houses

The re are three purpose-built public house buildings within the conservation area, one of which – The Phoenix, remains in active use. The other two, The Bell and The Angel, closed in the 2020s and remain at the time of writing vacant. Their scale and massing are indicative of their use as centres of social pasttime, and all three have large, prominent street facing façades built in red brick, with embellishments including faux Tudor timber framing, bay windows and ornamental brick detailing.



View of shopfronts at No.19-23 Upminster Road South, showing late 19th century extensions to early 19th century terraced cottages.



Shopfronts within No.24-28 Bridge Road, built c.1897



The Phoenix public house

#### 4.13.4 Residential Buildings

Historic residential buildings include the 18th century Vicarage and Redbury House, which present prominent brick frontages to Broadway. Both rise two-storeys beneath pitched roofs set with dormers, and are set back from the pavement by a narrow stretch of planting.

Rainham Hall and its ancillary buildings are now owned by the National Trust but were designed and built as residential buildings. The hall represents a grander style typical of an 18th century merchant's house, rising three-storeys in brick with

stone dressings. This is now a key feature of the streetscape and conservation area, and paramount to understanding its historic development. Its current cultural use and interpretative offer go far in this regard.





The Vicarage, Grade II



View of the northern façade of Rainham Hall, its lodge and stable block, all separately listed at Grade II\*, from its publicly-accessible gardens

## 4.13.5 Religious Buildings

The conservation area's single religious building is the Church of St Helen and St Giles, which is still in active use as a place of worship and forms the most prominent fixture within the townscape. Its size and massing provide visual breaks within the centre, and its rich external enrichments from iterative phases from c.1170 to the present day provide high architectural interest. It has high communal and historic value as the oldest building in the borough.





View of St Helen and St Giles church, from within the churchyard.

#### 4.14 Architectural Details

A mix of 18th, 19th and early 20th century architectural detail survives on principal elevations within the conservation area.

Rainham Hall presents the most enriched façades, but elsewhere more modest decorative elements include applied timber embellishments, door canopies and intricate leaded glazing.

Polychromatic bricks and decorative arrangements have been used on late 19th and early 20th century buildings to create intricate cornices, such as at the Phoenix Public House.

Decorative relief brickwork has been used to good effect at the Bell Public House, where a raised grid pattern embellishes one of the principal gable façades.



Detail of first floor window of the Angel Public House.



Detail of upper storey of the Bell Public House.



Detail of brick cornice decoration at the Phoenix Public House.



Detail of entrance canopy at Redbury.



#### 5.1 Introduction

This section of the Conservation Area Appraisal and Management Plan provides analysis of the current issues and opportunities facing the Rainham Conservation Area and reflects the findings of a detailed site survey and initial stakeholder consultation. It will be reviewed and updated following public consultation to ensure holistic coverage.

The analysis is set out around the below themes:

- 5.2 Development Opportunity
- 5.3 Detracting Buildings, Elements and Additions
- 5.4 Shopfronts and Advertising
- 5.5 Maintenance and Repair of Buildings
- 5.6 Public Realm

5. Sustainable Development and Climate Change age St Interpretation and Raising Awareness

#### **Development Opportunity**

Kanham enjoys the unique combination of village character, good transport links into central London and adjacent open space at the fringe of the borough, all qualities of a desirable place to live. This, alongside the nationwide housing shortage which local authorities are under pressure to accommodate. means that there is an inevitable desire for new development within the area. A new housing scheme has recently redeveloped a considerable tract of land west of Broadway and opposite St Helen and St Giles church within the conservation area, and there is also potential for development within its immediate and wider setting.

This can present a challenge in historic areas such as Rainham, where the historic character of buildings and townscape is especially sensitive to change. Given the density of the conservation area, there are very few sites which have been identified as detracting from its special interest in Section 4.5; these present opportunities for the enhancement of historic character through sympathetic redevelopment.

Any proposals for new development both within the conservation area and within its setting should be carefully considered and well designed to ensure that the special interest and character of the conservation area as a designated heritage asset are preserved. Particular attention should be paid to the placement, height, massing and materiality of any proposed development within the conservation area or its setting, also taking important views and the potential impacts of accompanying infrastructure changes into account.

#### 5.3 **Detracting Buildings, Elements and Additions**

The overall quality and appearance of buildings and the street scene of the conservation area is generally good. Most historic frontages contribute positively to appearance and character of the area, though some have suffered from unsympathetic modern accretions. A small number of low-quality modern buildings also detract from the character and appearance of the conservation area. A number of these elements, from whole buildings to smaller-scale alterations, present opportunities for conservation area enhancement.

#### 5.3.1 Detracting Buildings

Detracting buildings and sites are identified as opportunities for enhancement on the area map included in Section 4.5. These buildings generally comprise massing and/or materiality which do little to relate to the area's historic character and detract from the street scene, and are found at the edges of the conservation area. They include the railway station, a squat, modern building with no architectural detail, adjacent vacant sites and car parks to the south.

If the opportunity arises to replace or alter detracting buildings, there is potential to enhance the conservation area by ensuring that proposals are sensitively designed and respond better to the area's historic context and the character and appearance of the townscape.

Any development within the setting of the conservation area should take into consideration its special interest, and be of high quality, sensitive design.



Rainham's railway station is a key entry point into the conservation area, but detracts from its historic character

#### 5.3.2 Unsympathetic Additions and Accretions

Modern accretions to historic building exteriors across the conservation area are largely unsympathetic. These elements, and particularly the cumulative impact of incremental additions, can detract from the appearance of historic elevations and, as a result, from the character of the conservation area. These include:

Surface-mounted services such as cables, conduit and security systems; there is opportunity to reduce visual clutter across frontages by removing or rationalising these elements, or by relocating them to more discreet locations. It is recommended that installation of any new external devices or technology be limited to rear elevations or rerouted internally so that they remain concealed from the public realm. Opportunities should also be taken to remove redundant wiring.

Television aerials and satellite dishes are modern and highly conspicuous elements which are visually intrusive within historic streetscapes; these are found throughout the conservation area atop roofs and fixed to frontages. Often dishes and aerials remain fixed to buildings after they become redundant. There is opportunity to remove the latter, and ensure that any new devices are located along rear elevations, concealed from the public realm. Planning permission is required for the installation of telecoms equipment on walls and roofs visible from the public domain, and listed building consent is required for installation on listed buildings.



Surface-mounted services & conduit detract from façades

#### 5.3.3 Windows, Doors and Rain Goods

Whilst a good number of timber windows survive in historic buildings across the conservation area, there are highly visible examples of insensitive replacement in uPVC in the village centre. uPVC doors and plastic rain goods have also replaced original and traditional versions in places.

Plastic windows in particular negatively affect the appearance of buildings, but all plastic features are modern, alien additions to the historic environment and have a detrimental impact on the character and appearance of the conservation area. Their installation often constitutes the loss of the original or historic features and profiles, which incrementally reduces the special interest of the area. In addition, the use of plastic windows and doors reduces the breathability of traditionally constructed buildings, by preventing moisture from egressing the building; this can cause wider damage to building fabric. There are opportunities to return windows to traditional materials and appearance where they have been altered.

There are a few instances of visible rooflight installations within historic façades in the village centre. These are particularly modern insertions which break up the appearance of historic pitched roofs and detract from the character and appearance of the conservation area. There is potential for an Article 4 direction to be implemented to better control proposals for window changes in the future.



Low-quality window replacement is evident across prominent conservation area façades



Visible rooflights at the village centre

#### 5.3.4 Boundary Treatments

Boundary treatments within the conservation area are generally historic or of appropriate profile and materiality, particularly within the village core. However, utilitarian, unfinished metal fencing is visible at the fringes of the conservation to the north and south which detracts from area character. Whilst it is understood that some security fencing relates to the railway, there is opportunity to replace other unsightly boundary treatments in metal fencing in a traditional profile; simple, black-painted railings are generally considered most appropriate.

In some cases, overly-utilitarian modern metal fencing is used at the entrances to rear yards between historic buildings; there importunity to replace these with gates of a sympathetic file.





Utilitarian metal fencing along north boundary of the conservation area

#### 5.4 Shopfronts and Advertising

Retail trade is a very important part of Rainham's economy, both historically and today. Whilst there are a considerable number of historic shopfronts surviving, some have been unsympathetically altered or replaced over time. This is particularly visible along the central village triangle, and in places along Upminster Road South, where it has a detrimental impact on the special interest of the conservation area.

Oversized fascia signs in plastic or metal are particular issues, and some employ internally-lit signage. Overlarge fascias obscures the legible proportions of historic façades and neighbouring façades, and often conceal historic fabric or architectural details. The colour and design of some shop situage does not respect the character of either the building of the historic street scene as a whole.

While many shopfronts employ traditional glazing and stall riper proportions and arrangements, detailing is often crude of verly-plain. Modern accretions, including security bars, ventilation grilles and low-quality lighting also detract from the street scene, as do shopfronts which have had their historic profiles and proportions replaced with larger windows without subdivision.

Planning permission is required for alterations or changes which materially affect the external appearance of shopfronts. When opportunities arise, shopfronts and shop signage should be returned to a more traditional appearance, or utilise design features or patterns that are generally in keeping with historic shopfront proportions and materiality where appropriate. Guidance on shopfront design is included in **Section 6.5**.



Oversized fascia signage at the village centre



Some conservation area shopfronts comprise poor detailing and modern accretions



Overlarge glazing without subdivision is generally inappropriate for a shopfront within a historic frontage

#### 5.5 Maintenance and Repair of Buildings

The area as a whole remains in active commercial use, with high footfall and commercial tenancy. Buildings are overall in good condition and play an active role in the public experience of the conservation area.

Some buildings suffer from a lack of maintenance or are in need of repair. Issues include peeling paint to render, deteriorated render, peeling paint to timber windows, loose or missing roof tiles, water damage and staining to brickwork, and loss of glazing. It is critical that the causes of these issues are resolved to prevent reoccurrence and further damage.

Ingther instances, the loss of historic detail is indicative of lowcondity repair. A number of terraced frontages in Upminster and South have lost their historic dentilled cornices, and prominent historic blocks within the village triangle have been repaired or modified with mismatched fabric.

Vacancy also presents building condition concerns, as vacant buildings are often not maintained whilst awaiting new occupancy. This is currently the case for the two public house buildings which frame the western entrance into the conservation area, where boarded-up windows, broken windows and brickwork degradation are evident. These vacant buildings in prominent townscape positions emit sense of decline.

As well as having an impact on physical building fabric, these maintenance and repair issues harm the appearance of both individual buildings and the wider conservation area. There is guidance on good practice maintenance and repair methods in Section 6.4 and additional sources of guidance in Further Information and Resources.



Render damage, Broadway





Vacant public houses at the conservation area's western entrance detract from area character

#### 5.6 Public Realm

The pedestrian triangle at the village centre is an important and popular area of public realm within the conservation area which enjoys views of several of its designated heritage assets. However, it currently comprises a mix of street furniture in various materials and profiles that lack cohesion and detract from its sense of place. There is opportunity to rationalise street furniture here; any proposed street furniture should be of high quality design and materials which remain sensitive to the historic character of the conservation area.

Traditionally-profiled streetlamps across the conservation area effectively help to demarcate it from its setting; lampposts should undergo regularly-scheduled maintenance, inspection, and repair. Bollards in an array of profiles and materials are found throughout the conservation area. There is opportunity to rationalise and replace modern bollards in metal in a traditional profile that complements the character of the conservation are.

The River Ingrebourne presents a green space along the conservation area's western boundary with important historic ties to the development of Rainham. There is opportunity to improve the public realm offer within the park along the river to improve its appearance, and so that it can more legibly relate to the rest of the conservation area.



The pedestrian triangle at the village centre is a key area of public realm



The park alongside the River Ingrebourne currently lacks a cohesive public realm strategy.

# 5.7 Sustainable Development and Climate Change

The London Borough of Havering intends to be carbon neutral by 2040, and in March 2023 declared a climate and ecological emergency recognising the threats of climate change to the borough. This issue interacts with the conservation area in a number of ways, including changes to buildings and the way people move around the area.

Havering Council have embedded climate change mitigation and minimising carbon emissions throughout the Local Plan, including within its Strategic Objectives and in Policy 12, Healthy communities and Policy 36, Low carbon design and repewable energy.

# **Energy Efficiency Upgrades**

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Whilst the maintenance and continued use of historic buildings inherently sustainable, there is likely to be both a desire and pressure from government over coming decades to improve the energy efficiency and reduce the carbon footprint of Rainham's historic building stock. Reducing heating requirements combined with using more sustainable sources of heat and power are the two main aspects to consider.

There are many opportunities to improve the energy efficiency and reduce the carbon footprint of historic buildings which will have no impact on the character and appearance of the conservation area. These include improving the thermal performance of the building stock through insulating roofs and suspended ground floors, draught exclusion and introducing secondary glazing. Historic and traditionally constructed buildings were designed to be breathable, allowing moisture to naturally exit building fabric. Care needs to be taken to make sure buildings of this type remain breathable, rather than air-tight, through choosing appropriate materials as retaining moisture will harm the fabric of the building.

Care also needs to be taken if external changes are proposed, to ensure they remain sensitive to their historic context. This could include the addition of solar photovoltaic panels on south or east/west facing roofs as an additional heating or hot water source. However, these must not detract from the historic character of the building and are likely to be only acceptable when positioned on rear roof slopes not visible from the public realm. Where solar panels would be on a wall or roof slopes facing the public highway, or on a flat roof, planning permission is required.

#### 5.7.2 Upgrades within the Public Realm

Reducing petrol and diesel car use is critical to reducing carbon emissions and there is government commitment to phasing out their sale over the next decade. Petrol and diesel car use will be replaced by a combination of electric (or other carbon-free) vehicles and active, car less travel. Both will require infrastructure changes that will need to be considered in the context of the special interest of the conservation area to ensure they are implemented appropriately.

Electric vehicles require charging points which can be installed within existing car parks and adjacent to street parking bays. Although these are relatively unobtrusive, they are likely to increase visual street clutter to a degree and should therefore be considered alongside other reductions in street furniture clutter. However, lamppost charging points and wireless charging may become viable in the future which and are likely to be compatible with a conservation area environment.

Encouraging active travel, cycling, walking and the use of e-scooters is also key to reducing carbon emissions. Reducing vehicle movement in the conservation area will improve air quality and make active travel more pleasant and safer. Improved signposting for cycling and walking routes could be introduced whilst taking care not to add to visual clutter through excessive increased signage. There clusters

of cycle stands near the station and the library, but only two in the village centre; there is opportunity to expand on these within the historic village core.

#### 5.7.3 Trees and Open Spaces

Maintaining existing trees and replacing lost or dying trees are an important part of the strategy to tackle climate change and trees also contribute considerably to the special interest of the conservation area. Street trees help to soften the area's urban grain, and contribute to its sense of place. There are currently large planters in place within the central village triangle, but these only contain low-level planting. There is opportunity to provide trees in planters or planted directly into the ground within this pedestrian space, which could help soften its otherwise hard finishes and sparse character.

Permission is needed for any works to trees above a certain size in the conservation area (see **Section 6.3**) and justification is required for the loss of any street trees, which should be also be replaced with new trees. A succession planting strategy would be beneficial to ensure existing tree coverage is maintained into the future and opportunities for new trees should also be considered.



Underutilised planters in village centre

#### 5.8 Interpretation and Raising Awareness

Whilst there is a good level of local appreciation for the historic development of Rainham, aided in part by the National Trust's interpretative offer at Rainham Hall, there are opportunities to increase awareness of the special interest of the conservation area. This is particularly the case around the River Ingrebourne, once home to Rainham's historic wharf, where there is a lack of legibility regarding the historic importance of the water feature; there is an opportunity here for the installation of interpretive signage to encourage increased historic awareness.

It is beneficial to provide area residents and tenants with clear information on the responsibilities and benefits of owning a building in the conservation area and the implications of proposing changes to buildings. There are also opportunities that aise awareness of the importance of building maintenance prevent degradation amongst local owners and occupiers.

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#### 6.1 Introduction

Section 6 provides a framework to guide change within the Rainham Conservation Area, based on the understanding of its special interest set out in earlier sections of this document. The overarching ambition for the conservation area is to preserve and enhance what is special about it, and thus this is the statutory duty of the Council. This is achieved by ensuring that change and development take place in a considered and sympathetic way, and by raising awareness of and promoting shared responsibility for looking after the conservation area.

The long-term objectives of conservation area management are to phase out past ill-considered changes and additions, and to ensure that new development is of high quality and responds to the conservation area's special character. This attilies to very small changes, such as reinstating lost historic features, to proposals for new development both within the observation area and its setting. In addition, the regular maintenance of buildings is a vital part of preserving both the precessary; ensuring that these are undertaken sensitively is an important part of looking after historic buildings and the conservation area as a whole.

The following sections set out how and why change within the conservation area is controlled, good practice advice on maintenance and repair and specific guidance on alterations, extension and new development. Specific recommendations can be found in **Section 6.8**.

## 6.2 Planning Legislation, Policy and Guidance

Planning legislation, policy and guidance is utilised when determining applications for development or other changes within the conservation area. This is to ensure that proposals seek to preserve or enhance the area's special interest including the contribution made by its setting.

The primary legislation governing conservation areas is the Planning (Listed Buildings and Conservation Areas) Act 1990. This sets out statutory duties for local planning authorities in managing change within conservation areas. Regional and local planning policy reflect this legislation in the protection and enhancement of conservation areas. See the London Borough of Havering's website for details regarding current national policy regarding the historic environment and the relevant policies set out within the Havering Local Plan.

In addition to legislative and policy requirements there is a wealth of best practice guidance and advice available from Historic England and other heritage organisations. When changes are being considered to buildings within and in the setting of the conservation area, it is often helpful to first seek pre-application advice from the Council to gain early guidance on proposals and discuss any constraints or opportunities; details for this can be found on the London Borough of Havering's website.

Links and details of all the relevant policy, guidance and advice can be found in **Further Information and Resources**.

# 6.3 Control Measures Brought about by Conservation Area Designation

#### 6.3.1 Restrictions on Permitted Development

In order to protect and enhance the Rainham Conservation Area, any changes that take place must preserve, respect or contribute to the character and appearance which makes the conservation area of special interest. Permitted Development Rights, as defined by The Town and Country Planning (General Permitted Development) (England) Order 2015, are works which can be undertaken without the need to gain planning permission. Permitted Development Rights are different in a conservation area, meaning that planning permission is needed for works which materially affect the external appearance of a building.

This includes, but is not restricted to:

- The total or substantial demolition of buildings or structures (including walls of over 1 metre in height, gate piers and chimneys);
- Other partial demolition including new openings in external elevations:
- Works to trees with a diameter of 75 mm or greater, measured at 1.5 metres from soil level;
- Changes to the external finish of a building (including rendering, pebble dash or other cladding);
- Changes to the roof shape including installation of new dormer windows and chimneys;
- Any extension other than a single-storey rear extension of 4 metres or less (3 metres or less if the house is detached or semi-detached);
- Extensions to the side of buildings;
- Any two-storey extensions;
- Erection of an outbuilding to the side of a property;
- Aerials and satellite dishes on chimneys or elevations visible from the street;
- Putting up advertisements and other commercial signage (advertising consent may also be required);
- Changing the use of a building (e.g. from residential to commercial); and
- Installing solar panels that are wall-mounted on a wall or roof facing the highway.

For further information and advice about when planning permission is required within a conservation area, see the guidance on the Government's Planning Portal or contact the London Borough of Havering Planning Department. It should be noted that proposals which impact listed buildings, including changes to their setting, may also require listed building consent.

#### 6.3.2 Article 4 Directions

The Council can develop bespoke controls to ensure that specific elements of a conservation area are protected from harmful change. This is done through the application of an Article 4 Direction. These provide additional control by specifically revoking certain permitted development rights, meaning that planning permission needs to be sought before work can be undertaken.

Should the Council wish to do so, the process of implementing any new Article 4 Directions will be undertaken at a future date, separate from the adoption of this CAAMP.

Conservation and the Repair of Buildings

buildings require maintenance and repair regardless of rage, designation (or lack thereof) or significance. In conservation areas, it is important that such works are carried sensitively to protect the historic fabric of buildings and preserve the established character of the wider area. The following sections provide a summary of best practice advice on maintenance and repair. Historic England and other heritage bodies, including the Society for the Protection of Ancient Buildings (SPAB), provide a wide range of advice and guidance on how to care for and protect historic places, including advice on their maintenance and repair. See Further Information and Resources for information.

#### 6.4.1 Maintenance

<del>6.4</del>

Maintenance is defined as routine work necessary to keep the fabric of a place in good order. It differs from repair in that it is a pre-planned, regular activity intended to reduce the instances where remedial or unforeseen work is needed. Regular maintenance ensures that small problems do not escalate into larger issues, lessening the need for repairs, and is therefore cost effective in the long-term. In general maintenance work does not require consent from the Council, however some maintenance works may require consent.

Regular inspection of building fabric and services will help identify specific maintenance tasks relevant to each building. These could include but are not limited to:

- Regularly clearing gutters and drain grilles of debris, particularly leaves;
- Clearing any blockages in downpipes;
- Sweeping of chimneys;
- Removal of vegetation growth on or abutting a building; and
- Repainting or treating timber or metal windows and other external timberwork.

#### 6.4.2 Repair

Repair is defined as work that is beyond the scope of maintenance undertaken to remedy defects caused by decay, damage or use, including minor adaptation to achieve a sustainable outcome, but not involving alteration or restoration. Identification of repairs may arise during regular inspection of buildings or following extreme weather events and could include repairing damage to roof coverings, repointing of brickwork or repairs to windows.

It is important to understand the cause of any damage or defects both to ensure that the repair is successful and to minimise the work that is required. It is also important to understand the significance of the built fabric affected in order to minimise harm when enacting a repair. As with maintenance, consent may be required for some types of repair work; it is advisable to discuss with the Council before any work is undertaken.

The following should be considered when planning repair works:

 Repairs should always be considered on a case-bycase basis. A method of repair which is suitable for one building may not be suitable for another.

- Only undertaking the minimum intervention required for any given repair.
- Use materials and construction techniques which match the existing fabric to maintain the appearance and character of the building. The exception to this is when existing materials or techniques are detrimental to the built fabric – for example, cement pointing on a historic brick building.
- Repair is always preferable over the wholesale replacement of a historic feature.
- If replacement of a historic feature is required for example, if it has degraded beyond repair the replacement should be carried out on a like-for-like basis using the same materials and construction techniques. The replaced element should be the same as the original in terms of material, dimensions, method of construction and finish (condition notwithstanding) in order to be classed as like-for-like.
- Like-for-like replacement should not be applied in cases where a historic feature has previously been repaired using inappropriate materials or techniques. When seeking to improve failing modern features or past unsuitable repairs, a traditionally-designed alternative using appropriate materials is preferable, such as breathable, lime-based renders and paints. In such cases planning permission, and in the case of a listed building, listed building consent, may be required.
- Repairs should, where possible, be reversible, as better alternatives may become available in the future.
- Repointing should always be carried out using a limebased mortar. Within historic and traditionally constructed buildings, cement-based pointing is damaging to brickwork and stonework as it is an impermeable material. Periodic renewal of pointing will extend the lifetime of building fabric.

#### 6.5 Proposing Change to Buildings

#### 6.5.1 Alteration, Extension and Demolition

The appropriateness of demolition, alteration or extension will be considered on a case-by-case basis, as what is appropriate in one location will not necessarily be acceptable in another. In all cases it is vital to consider the impact of the proposed change on the special interest of the conservation area ensuring that this is preserved or enhanced.

Demolition of buildings that detract from the character and appearance of the conservation area may be beneficial. However, gap sites can also detract from the character of the conservation area, and therefore demolition of whole buildings may only be permitted in instances when rebuilding is proposed, when the site was historically open and this remains appropriate, or when an alternative suitable future use the site is planned.

Alterations should preserve or enhance the character of the deservation area, and changes should be sensitive to its prevailing architectural and visual character. Alterations may comprise of the removal of detracting features such as uPVC windows, and where appropriate, their replacement with more historically appropriate versions. Alterations should therefore use appropriate materials for their context, and ideally those that are typically found within the conservation area. This may include timber for windows and doors and brickwork for structural elements. New materials may be appropriate as long as they are complementary to the appearance of the area.

Extensions should be subordinate to the existing buildings in their scale, massing and design, and should ensure that any existing historic features remain legible. Extension to the side and front of buildings is unlikely to be appropriate as this would change the visual appearance of the streetscape, whereas extension to the rear, where space allows, is likely to be more acceptable. All extensions should be of high quality design and construction. Whilst the design may use materials and finishes

which are characteristic to the conservation area, there may be scope for use of a wider, less traditional material palette where these are part of a high quality, sensitively-designed extension that complements or enhances the appearance of the original building and the conservation area setting.

# 6.5.2 Alterations Proposed in Response to Climate Change

There are many opportunities to make changes to historic buildings in the conservation area which will assist in improving their thermal performance and, as a result, tackle climate change. Internal works in unlisted buildings will not require planning permission; however, for any works which affect the exterior of a building it will be required. Any works to listed buildings, both internal and external, will require listed building consent and those to the exterior will also require planning permission.

Internally, adding insulation to roofs or lofts and below suspended ground floors will improve thermal efficiency, and draft exclusion around windows, doors and vents will also be beneficial. Installing secondary glazing will also improve thermal performance, though it is noted that double or triple glazing may be considered appropriate in some conservation area buildings, pending impacts to the character of the building and wider setting. Care should be taken to ensure that traditionally constructed buildings remain sufficiently breathable to avoid causing harm to the fabric of the building.

Externally, solar panels could be installed on rear roof slopes not visible from the public realm. Where solar panels are proposed to be installed to listed buildings, even on rear roof slopes, listed building consent will be required. Other renewable energy sources could be considered, such as ground, air or water-sourced heat pumps, so long as they do not detract from the character or appearance of the conservation area.

When planning the installation of electric vehicle charging points (EVCPs) care should be taken when installing any outlets, conduit, etc. in historic building fabric to avoid unnecessary fabric loss and minimise the visual impact of the EVCP in views from the street. EVCPs often require vehicles to be parked at close range; the impact of this on the character and appearance of the street and wider conservation area should be carefully considered. The installation of an EVCP does not require planning permission, the areas in question must be lawfully used for off street parking.

#### 6.5.3 Modern Additions to Historic Buildings

Proposed modern additions to buildings should be carefully considered to ensure they are both necessary and appropriate to the character and appearance of the conservation area. The removal of unsympathetic features such as redundant external wiring, satellite dishes and television aerials should be undertaken proactively, as this will remove visual clutter and thus enhance the appearance of the conservation area. The installation of new television aerials and satellite dishes on a wall, chimney or roof slope that faces onto and is visible from the conservation area public realm (generally to front and side elevations) requires planning permission and is discouraged. The visibility of such features detracts from the appearance of the conservation area; therefore care should be taken to locate these items discreetly, ideally to the rear of buildings.

#### 6.5.4 Windows, Doors and Drainage Goods

There have been instances in which uPVC units have been used to replace historic windows. uPVC doors and plastic gutters and drainpipes also found on historic buildings in places throughout the conservation area. Plastic or uPVC elements are not in keeping with the appearance or character of a historic building, and thus detract from the special interest of the conservation area. Therefore, replacement of historic or traditional windows, doors and drainage goods is discouraged unless they are damaged beyond repair. Where such replacement is necessary this should be in materials and styles appropriate to the building. Where inappropriate

replacement has already been undertaken, returning these features back to their traditional appearance is encouraged. The proportions and type of window will be dependent upon the age and style of an individual building.

Doors and window frames should be painted in appropriate colours. Changes in colour beyond a shade lighter or darker of the existing colours will likely require planning permission, with decisions based on surrounding context and appropriate historic precedent. Drainage goods would have historically been painted cast iron or lead; however other metals may be appropriate subject to their detailed design.

#### 6.5.5 Boundary Treatments

conservation area, but some form key elements of the townscape within the village centre. Inappropriate or low-lity existing boundary treatments should be replaced opportunities arise. When new boundary treatments are proposed, these should remain sensitive to the historic character and appearance of the conservation area and avoid introducing clutter to the street scene.

#### 6.5.6 Shopfronts and Signage

Retail is an important function at the heart of the conservation area, and therefore the design and appearance of shopfronts is important to preserving and enhancing its character. Changes to shopfronts will require planning permission, and, if part of a listed building, listed building consent. Changes to signage and advertising will require advertisement consent.

A shopfront is part of a building as a whole, rather than being a separate entity. The design of shopfronts therefore needs to reflect the style, proportions, vertical or horizontal emphasis and detailing of the rest of the building, particularly the principal elevation. This is the case for both buildings which historically contained retail at ground floor and where a shopfront has been a later insertion.

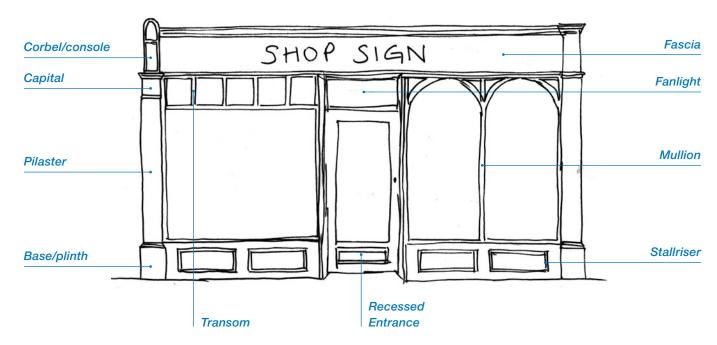
Where historic or existing shopfronts contribute to the character and appearance of the conservation area, they should be retained and enhanced where possible. Any historic shopfront features which survive should be retained, repaired as necessary, and incorporated into new schemes, rather than being replaced or concealed. It would be desirable to reinstate historic features, such as corbels and pilasters where these have been lost.

Where it is appropriate to replace all or parts of a shopfront, traditional styles and materials are likely to be most appropriate in historic buildings, but nontraditional, sympathetically designed shopfronts would be appropriate in modern and new buildings. The replacement of inappropriate

modern alterations to shopfronts with suitably-designed traditional alternatives is encouraged. The use of plastic and metal is not considered to be appropriate in historic contexts.

Pilasters, cornices, fascias and stall risers are all important elements in creating the visual proportions of traditional shopfronts within historic buildings. Fascias are of notable importance and should be in proportion to the rest of the shopfront; they should not be overly large or extend above cornice level or beyond the corbels on either side. Full height glazing is a modern feature and does not reflect the character of historic buildings, though may be considered appropriate in more recent buildings.

#### Components of a Traditional Shopfront



The design and detailing of advertising and signage content, both on fascias, hanging signs and any free-standing signage, are also important in the conservation area. The signage should complement the design of the shopfront and building, conveying a sense of permanence and quality. Colour palettes, lettering style and illumination need to be considered in the design of a complementary shopfront. With regards to illumination, internally lit signage is generally considered inappropriate within the conservation area context; subtle external lighting is more appropriate. Careful consideration needs to be given to the appropriateness of free-standing signage such as A-boards as these can cause visual clutter and physical impediment to pedestrian movement.

There are examples of fabric canopies within the conservation area and such features can add interest to the street scene impey are of an appropriate design which also considers pacts on neighbouring shopfronts and longer street views. Canopies should avoid obscuring historic features, should be retractable and be made of canvas. Dutch-style canopies, which are visible when retracted, are not appropriate. Canopies would have traditionally been positioned above fascia signage and this is therefore the most appropriate position for replacement or new canopies; projecting hanging signage will allow the shop name and advertising to remain visible when the canopy is down. Installation of canopies will require consent from the Council.

#### 6.6 New Development

# 6.6.1 New Development within the Conservation Area

There are relatively few opportunities for new development within the conservation area. However, some sites comprise detracting buildings or vacant areas, the sensitive replacement or redevelopment of which could enhance the conservation area's appearance. There may also be opportunities to redevelop buildings which make a neutral contribution to the conservation area. Any new or replacement development

needs to take account of, and remain sensitive to, the following:

- The significance of any building proposed for demolition;
- The significance of the relationship between any building to be removed and adjacent structures and spaces;
- The potential to draw inspiration from the historic use and character of a site;
- The significance or contribution of any gap site; is it a historic gap within the street frontage or does it detract?;
- The potential impact of proposals on known or potential archaeological remains;
- The potential impact of proposals on the setting of any neighbouring listed buildings;
- The materials and architectural detailing characteristic of the area - these should be a key point of reference in the choice of materials and detailing for proposed new development;
- The scale and grain of the surrounding area, including historic plot boundaries;
- The proposed height of new development in relation to neighbouring buildings and the surrounding context; and
- The potential impact of proposals on important views and the prominence of landmark buildings within the conservation area.

The above list is not exhaustive; each location will present its own unique requirements for sensitive and appropriate proposed development. In all cases, new development must be of high quality design, construction and detailing. The principal aim of new development should be to preserve or enhance the character of its immediate setting and the conservation area as a whole.

# 6.6.2 New Development in the Setting of the Conservation Area

The setting of the conservation area contributes considerably to its special interest, and there are likely opportunities for new development within this setting. New development should remain sensitive to its location within the setting of the designated heritage asset and enhance or preserve, rather than harm, its special interest. Proposed new development should be of the highest quality design and execution, regardless of scale, in order to achieve this and, where relevant, help phase out ill-considered and unsympathetic interventions from the past.

#### 6.7 Public Realm

The public realm, namely publicly accessible streets and open spaces, is the area from which the majority of people will experience the conservation area. Preserving and enhancing its character and appearance is therefore of considerable importance for maintaining the special interest of the area. The public realm consists not only of street surfaces, but the street furniture, street signs and interpretation.

A sensitive and holistic approach to change and improvement to the public realm within an overarching strategy is needed, including changes to road infrastructure to encourage cycling and walking. Any additions or amendments to the public realm will also need to take account of highways and other relevant regulations.

Care should be taken to ensure future public realm works are considered for the longer term and materials both for street furniture and surface treatments are durable and of high quality, and remain sensitive to the character of the conservation area.

In addition to street furniture, road signage, freestanding shop signage, broadband cabinets, and elements such as inappropriately located café seating can collectively cause excessive clutter within the public realm and detract physically and visually from the pedestrian experience of the conservation area. Applications associated with features within the public realm should be carefully considered to make certain that public streets remain pleasant and attractive places to be whilst ensuring that commercial activities can continue successfully.

Installation of vehicle e-charging points are likely to become a feature of the street scene in the near future. Although these are relatively unobtrusive, they are likely to increase visual street clutter to a degree and should therefore be considered alongside other elements of street furniture.

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#### 6.8 **Specific Recommendations**

The following recommendations have been developed in response to the issues and opportunities within the conservation area identified in Section 5, and in light of the guidance on managing change provided in Section 6 over previous pages. These recommendations are designed to ensure the preservation and enhancement of the special interest of the Rainham Conservation Area.

- 01 The historic environment of Rainham, in particular that which contributes to the character and appearance of the conservation area, should be maintained to ensure the area remains a desirable place to live, work and visit.
- O2 Proposals for extension, alteration and new development should preserve or enhance the special interest of the conservation area, or where the public benefits would outweigh any harm.
- 03 The design, construction and materials of any new development, extension, alteration or repair should be of the highest quality and respect their local context.
- 04 Development within the setting of the conservation area should be sympathetic to its special interest in terms of its scale, massing, proportions, materials and detailing.
- 05 Development within the setting of the conservation area should ensure the green and spacious nature of the setting, which contributes to its special interest, is maintained.

- 06 Trees which contribute to the character of the conservation area should be retained, or replaced as necessary; opportunities for additional tree planting and green landscaping should also be carefully considered.
- O7 Changes to buildings in response to climate change are encouraged but should take into consideration the character and appearance of the conservation area.
- 08 Careful removal of inappropriate and unsympathetic additions to buildings and the street scene is encouraged.
- 09 Reinstatement of lost historic features, such as timber sash windows or corbels and stall risers on traditional shopfronts is encouraged, where appropriate.
- 10 Replacement of inappropriate modern alterations to shopfronts with suitably designed traditional or sympathetically designed alternatives is encouraged.
- 11 The condition of the conservation area should be monitored and reviewed periodically.



# **Further Information and Resources**

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#### **Consulted Archives**

Havering Library and Local Studies

Historic England archive

#### **Further Sources of Information**

For further study, the following archives hold material that may be of relevance to the history and significance of Rainham:

- Havering Library and Local Studies
- London Metropolitan Archive
- Essex Record Office
- The National Archives
- Historic England Archive
- National Trust Heritage Records database

#### Legislation, Policy and Guidance

Legislation, Planning Policy and Best Practice Guidance

The following legislation, policy documents and guidance have been utilised in undertaking the conservation area review and preparing this report.

- a Planning (Listed Buildings and Conservation Areas) Act
   1990
- Ministry of Housing, Communities and Local Government, National Planning Policy Framework (2023) (specifically Section 16: Conserving and Enhancing the Historic Environment)
- London Borough of Havering, Havering Local Plan (2016-2031)

- London Borough of Havering, Havering Character Study (August 2024)
- London Borough of Havering Archaeological Priority Area Appraisal (May 2024)
- f Ministry of Housing, Communities and Local Government, Planning Practice Guidance
- g Historic England, Conservation Area Appraisal,
   Designation and Management: Advice Note 1 (Second Edition, 2019)
- h Historic England, Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment (2008)
- i Historic England, Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Second Edition, 2017)
- j Historic England Advice Note 18. Adapting Historic Buildings for Energy Carbon Efficiency (July 2024)

#### Planning (Listed Buildings and Conservation Areas) Act 1990

Listed buildings and conservation areas are designated under the Planning (Listed Buildings and Conservation Areas) Act 1990 for their special architectural or historic interest. Designation gives conservation areas protection as alterations, additions or demolitions are controlled by the need for planning permission, which is required by local planning authorities when change is proposed. Section 69 of the Act details the protection of conservation areas and is reproduced below, of specific reference is section (1):

# **Further Information and Resources**

'Section 69 Designation of Conservation Areas

- (1) Every local planning authority:
- (a) shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, and
- (b) shall designate those areas as Conservation Areas.
- (2) It shall be the duty of a local planning authority from time to time to review the past exercise of functions under this section and to determine whether any parts or any further parts of their area should be designated as Conservation Areas; and, if they so determine, they shall designate those parts accordingly.

The Secretary of State may from time to time determine that any part of a local planning authority's area which is not for the time being designated as a Conservation Area is an area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance; and, if he so determines, he may designate that part as a Conservation Area.

(4) The designation of any area as a Conservation Area shall be a local land charge.'

#### National Planning Policy Framework (2023)

The National Planning Policy Framework (NPPF) sets out the government's planning policies for new development within England and how these are expected to be applied. At the heart of the NPPF 'is a presumption in favour of sustainable development'. The most recent version of the NPPF was published in 2023 and of relevance to the current review is Section 16 – 'Conserving and enhancing the historic environment', in particular paragraph 197:

'When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.'

Also of relevance are paragraphs 212 and 213:

'Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 207 or less than substantial harm under paragraph 208, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.'

## Planning Practice Guidance

In 2014 the government launched the Planning Practice Guidance website (<a href="https://www.gov.uk/government/collections/planning-practice-guidance">https://www.gov.uk/government/collections/planning-practice-guidance</a>). The guidance is a live document intended to provide further detailed information with regard to the implementation of the NPPF. It includes the section 'Historic environment', which advises on enhancing and conserving the historic environment.

## Conservation Area Designation, Appraisal and Management Historic England Advice Note 1 (Second Edition)

This Historic England advice note, published in 2019, supports the management of change in a way that conserves and enhances the character and appearance of historic areas through conservation area appraisal, designation and management. Of great relevance to the review of the Rainham Conservation Area are the following paragraphs:

'10 Conservation area designation is undertaken to recognise the historic character of an area and/or in answer to the impact of development, neglect and other threats, on areas which are considered to have special architectural or historic interest. The appraisal is the vehicle for understanding both the significance of an area and the effect of those impacts bearing negatively on its significance. It will form part of the local planning authority's Historic Environment Record and will be part of the evidence base for the local plan and a material consideration in planning decisions.'

'77 Under section 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990 local planning authorities have a statutory duty to draw up and publish proposals for the preservation and enhancement of Conservation Areas in their districts from time to time. Regularly reviewed appraisals, or shorter condition surveys, identifying threats and opportunities can be developed into a management plan that is specific to the area's needs. In turn, this can channel development to conserve the Conservation Area's special qualities. Both areas in relative economic decline and those under pressure for development can benefit from management proposals that promote positive change.'

# **Further Information and Resources**

#### Conservation Principles, Policies and Guidance

Conservation Principles was published by English Heritage (now Historic England) in 2008. It provides a comprehensive framework for the sustainable management of the historic environment, wherein 'Conservation is defined as the process of managing change to a significant place in its setting in ways that will best sustain its heritage values, while recognising opportunities to reveal or reinforce those values for present and future generations'. The guidance also provides a set of four heritage values, which are used to assess significance. The values are evidential, historical, aesthetic and communal.

Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Second Edition)

significance of a heritage asset is not only derived from its physical presence but also from its setting and the surroundings in which it is experienced. The Setting of Heritage Assets (2<sup>nd</sup> Edition) published in 2017 by Historic England provides guidance on managing change within the setting of a heritage asset. It recommends the following staged approach to the assessment of proposals during design evolution under Part 2: Setting and Views:

Step 1: Identify which heritage assets and their settings are affected.

Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated.

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it.

Step 4: Explore ways to maximise enhancement and avoid or minimise harm.

Step 5: Make and document the decision and monitor outcomes.

#### **Contact Details**

London Borough of Havering Planning Department: developmentplanning@havering.gov.uk

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# GIDEA PARK CONSERVATION AREA APPRAISAL AND MANAGEMENT PLAN JULY 2025











A team of experienced consultants from Purcell jointly contributed to the completion of this Conservation Area Appraisal and Management Plan.

Date	Issue	Revision	Reviewed	Approved
November 2024	01	First Draft	MH	MH
February 2025	02	Second Draft	EB	EB
June 2025	03	Final	EB	EB

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# GIDEA PARK CONSERVATION AREA APPRAISAL AND MANAGEMENT PLAN

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# 1.0 Introduction



## 1.0 Introduction

This section provides information about what conservation area designation means and its implications for development. It also gives an overview of the Gidea Park Conservation Area, sets out the purpose of the Conservation Area Appraisal and Management Plan (CAAMP) and outlines the consultation process that has been undertaken to prepare it.

#### 1.1 What is a Conservation Area?

A conservation area is defined as an 'area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance'.<sup>01</sup>

Designation of a conservation area recognises the unique quality of the heritage of that area as a whole. This quality is derived not only from individual buildings but also other features, including (but not limited to) topography, grain, materials, the roughfares, views, open spaces and landscape. These all tribute to the historic character and appearance of an area, resulting in a distinctive local identity and sense of place.

extent to which a building, or group of buildings or structures, positively shapes the character of a conservation area is derived from its exterior – principally those elevations which are street-facing but also side and rear elevations, the integrity of its historic fabric, overall scale and massing, detailing and materials. Open spaces, whether they are public or private, green or hard landscaped, can all contribute to the special interest of an area. Furthermore, the spaces between buildings, such as alleys, streets, paths and yards, all contribute to a conservation area's appearance and character, as does the setting of a Conservation Area.

# 1.2 What Does Conservation Area Designation Mean?

The aim of conservation area designation is to preserve or enhance the character and appearance which makes the area special. To ensure this, changes to the external appearance of buildings in a conservation area may require planning permission from the Local Planning Authority, as certain permitted development rights are curtailed. For example, full or substantial demolition of a building will require planning permission and works to trees within conservation areas must be notified to the Local Planning Authority in advance. There are often further restrictions in place in conservation areas through Article 4 directions, which remove certain permitted development rights; refer to Section 7.3 for details regarding the Article 4 direction which currently applies to the Gidea Park Conservation Area.

Under the National Planning Policy Framework (NPPF), conservation areas are designated heritage assets, and their conservation is to be given great weight when determining planning applications. <sup>02</sup> Further details can be found in **Section 7**.

The 2016-2031 Havering Local Plan (adopted in 2021) includes Policy 28, Heritage Assets, which sets out the Council's approach to development impacting heritage assets, including conservation areas and their settings.

#### 1.3 Gidea Park Conservation Area

#### 1.3.1 Overview

The Gidea Park Conservation Area is one of 11 conservation areas in the London Borough of Havering, each distinctly individual in character and representing a variety of the surviving areas from different periods of the borough's past. It was designated in June 1970 following an extensive report and survey undertaken by the Gidea Park & District Civic Society. Its boundary was then extended in 1989 to include Gidea Park railway station.

Gidea Park is an attractive London suburb east of the commercial centre of Romford. Its earliest development dates to a Roman road which extended between Colchester and London, though the area remained largely rural until the early-20th century when Sir Herbert Raphael, then-owner of Gidea Hall, devised a plan to develop the house's estate as a garden suburb rooted in the ideals of the Arts and Crafts movement.

A subsequent architectural competition and exhibition in 1910-11 delivered 159 new homes by the nation's leading architects, situated in generous plots across a designed townscape. A second exhibition of homes added were added to the northern end of the development in 1934. These buildings and streets form the focus of the Gidea Park Conservation Area, which also includes some subsequent development, the key green spaces of Raphael Park and Romford Golf Course and the commercial thoroughfare of Main Road at the heart of the conservation area.

## 1.0 Introduction

#### 1.3.2 Conservation Area Boundary

The conservation area encompasses the buildings and plots which comprised the 1911 Romford Garden Suburb Exhibition of Houses and Cottages erected across the former Gidea Hall estate, as well as those included in a second exhibition in 1934. It extends northward from Main Road to Eastern Avenue, incorporating Raphael Park to the west and a section of the Romford Golf Course to the east. A narrower section extends south of Main Road between Balgores Lane and Crossways. The conservation area was extended further southward to include Gidea Park Station in 1989. One change to the boundary has been made as part of the preparation of this CAAMP, see 1.4 below for details.

# **Boundary Review**

Pa

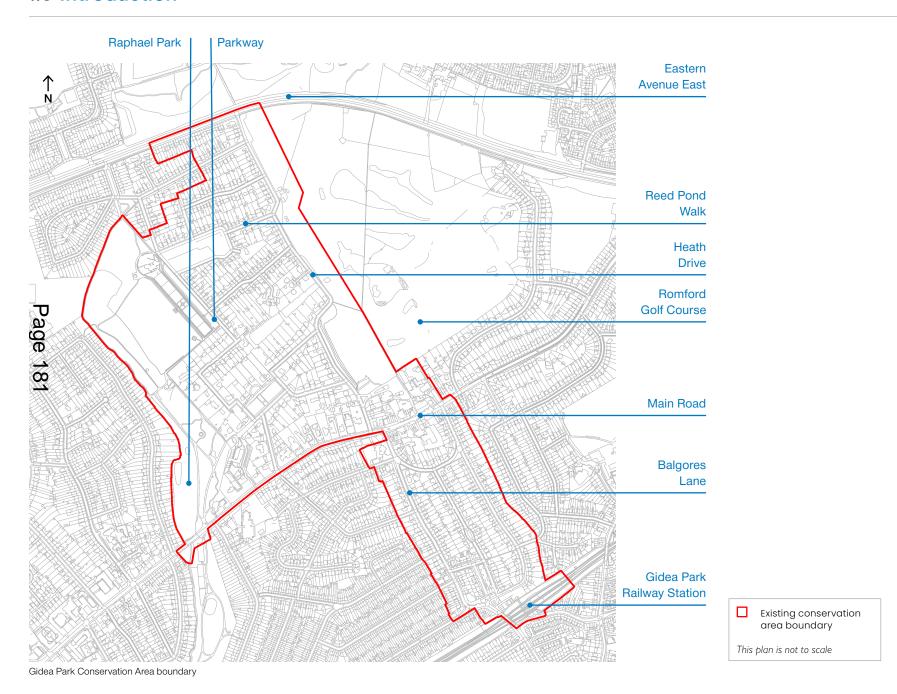
derstanding or appreciation of what is special about an area can change over time. Therefore it is important to recew and take stock of the boundaries and character of a conservation area at intervals to ensure that the reasons for its designation are still relevant and evident, and that the proper management of change is in place.

A review of the boundary alongside any accompanying guidance and assessments should generally take place every five to ten years or in response to a notable change (positive or negative), including changes in policy or legislation.

As part of the CAAMP review process, the former Gidea Park Character Area formerly identified by the London Borough of Havering within the setting of the conservation area was assessed as to whether it merited inclusion within the conservation area. Following a review of its historical and architectural interest via desk-based research and undertaking site inspection, it is the conclusion of this report that the conservation area should not be extended to include the former Gidea Park Character Area, as the latter lacks the historic interest and townscape and architectural qualities that give the conservation area its special interest.

In addition, based on the findings of archival research, a site inspection of the area and feedback from stakeholder consultation, the boundary of the conservation area has been amended to include the Interwar (erected between 1921 and 1938) parade of shops with flats above at 142-156 Balgores Lane, to more effectively encompass the townscape composition at the base of the conservation area where Balgores Lane and Crossways meet. This update is reflected on the Gidea Park Conservation Area Boundary map on the following page.

## 1.0 Introduction



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## 1.0 Introduction

## 1.5 Purpose and Scope of the Conservation Area Appraisal and Management Plan

Understanding the character and significance of conservation areas is essential for managing change within them. It is therefore a requirement under the *Planning (Listed Buildings and Conservation Areas) Act* 1990 that all Local Planning Authorities 'formulate and publish proposals for the preservation and enhancement' of conservation areas within their jurisdiction, and that conservation areas are periodically reviewed.

These proposals are normally presented in the form of a CAAMP, which defines and documents the special interest of a conservation area (see Section 2), analyses the characteristics that make it special (see Sections 3, 4 and 5), as well as rent issues and opportunities for enhancement (see Section 6) and sets out a plan for managing change to ensure item ngoing protection and enhancement (see Section 7).

This CAAMP has been prepared in line with current best practice guidance published by Historic England, the government's heritage advisor and the public body which manages the care and protection of the nation's historic environment.

This document is intended to be comprehensive; however, the omission of any building, structure, feature or space does not imply that the element is not significant or does not positively contribute to the character and special interest of the conservation area. The protocols and guidance provided in **Section 7** are applicable in every instance.

The assessments which provide the baseline information for this CAAMP have been carried out using publicly available resources and thorough on-site analysis from the publicly accessible parts of the Gidea Park Conservation Area.

#### 1.6 Consultation and Engagement

It is a statutory requirement under Section 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990 that conservation area guidance produced by or on behalf of the Local Planning Authority be subject to public consultation, and for the Local Planning Authority to have regard of the views expressed by consultees.

Informal consultation was undertaken with key stakeholders, including members of the Gidea Park Civic Society and the London Borough of Havering Planning Team, at early stages of the CAAMP drafting process to raise awareness of the conservation area review, utilise local understanding of the area's special interest and gather feedback on opportunities for enhancing this special interest and on the proposed conservation area boundary.

A draft of this CAAMP underwent public consultation from 28th April to 9th June 2025 including a public event. Comments received from this consultation have been incorporated into the final CAAMP as appropriate.

# 2.0 Summary of Special Interest



## 2.0 Summary of Special Interest

The special interest of the Gidea Park Conservation Area is principally drawn from its conception as an early 20th century garden suburb, and its presentation of a varied and characterful collection of residential dwellings that showcases the work of leading Arts and Crafts architects of the period, set within green and generous plots.

The development was originally envisaged via a competition and subsequent exhibition of houses in 1910-11, taking inspiration from north London's Hampstead Garden Suburb established a few years prior. Gidea Park was not ultimately executed to the same extent in regard to formal layout and the provision of community amenities. However, a uniquely verdant and architecturally diverse townscape of high quality homes founded the ideals of the Arts and Crafts movement was achieved, and the result is of high architectural and historic interest.

The new suburb incorporated some historic features and bardings already present within Gidea Park, including the garden walls and gate posts, fish ponds and other parkland

elements originally associated with the 18th century Gidea Hall. Buildings forming part of an 17th century settlement along today's Main Road known as Hare Street were also retained, and now contribute an additional layer of architectural and historic interest.

A second exhibition of houses in 1934 added a further genre of residential development to the northern part of the conservation area, which, whilst of somewhat lesser architectural interest, complements the form and grain of the original housing scheme. Subsequent infill of later housing has remained sensitive to the original development's scaling and arrangement for the most part, employing degrees of characterful individuality through varied massing, materials and architectural detail. External alterations to historic homes across the conservation area have been generally modest and/or sympathetically undertaken, though some insensitive modifications, replacements and redevelopments have eroded the character of the area to a minor degree.

The presence of mature greenery, and trees within verges, open spaces and private gardens softens the landscape and forms a verdant backdrop that is a fundamental part of the area's historic garden suburb character. In some cases, preexisting trees and landscape elements were deliberately integrated into the original townscape design and remain legible features today. As most houses have remained in their original use as single-family dwellings, front gardens and the visible presence of boundary treatments have largely survived intact and make a strong contribution to the character of the conservation area.

Other historic ancillary uses remain evident in commercial areas along Main Road and adjacent to the railway station at the conservation area's southern edge, and in recreational spaces. These add variety to the townscape whilst maintaining a legible historic relationship with the domestic neighbourhood. Whilst architectural and townscape features in these areas have undergone more substantial change over time, they retain historic interest.



Former Gidea Hall Fish Ponds



Two dwellings, typical of the architectural individuality of the area.

# 2.0 Summary of Special Interest



Detail of front elevation plasterwork.



Streetview, with housing and mature foliage.



Detail of chimney brickwork.



Detail of 1911 datestone and gable.



Dwelling with characterful roofline.



#### 3.1 Summary Historic Development Timeline

- Roman road between Colchester and London encouraged settlement development including Romford, granted a market charter in 1247.
  - Wealthy estates and villages were established near Romford; Hare Street inns were maintained by frequent travelers, and Gidea Park had a house as early as the 13th century.
- Gidea Hall and its formal gardens rebuilt in 1720 to the east of Romford north of the Roman road; Hare House erected to the south of the road in the 1760s.
- Railway line laid in 1839, cutting across the Hare Hall estate outh of Gidea Hall; no local station was built.
- 1897 Gidea Hall sold to Sir Herbert Raphael. Raphael, who donated land to found the Romford Golf Club to the east, and a public park to the west, the latter today's Raphael ark.
  - **1910** Development company formed to build a garden city suburb around Gidea Hall.
  - **1911** Exhibition of 159 homes built northwest of the new railway station station and around Gidea Hall, with prospective buyers offered completed homes or plots to build on. Building continued until outbreak of WWI in 1914.
- 1930 Gidea Hall was demolished.
- **1934** A second "modern homes" exhibition led to construction of further 35 houses to the north of the estate.
- London Borough of Havering established in 1965.
- 1970 Gidea Park designated a Conservation Area.

#### 3.2 Gidea Park Before the 20th Century

The ancient Roman road from Colchester to London established the first infrastructure within the Gidea Park area. This continued to be used as a major trade route, and as centuries extended into the late medieval period (1066-1540) major settlements such as Romford grew up along the roadway.

The wealthy established large estates near the growing market town, including at Gidea Park where a manor house was in situ as early as the 13th century. The Gidea Hall estate which grew up from this was also accompanied by the nearby Hare Hall, positioned south of the main road to the southeast of today's conservation area..

On the Main Road between the two major estates a development known as Hare Street flourished, supported both by local wealthy landowners and the trade traffic to and from Romford. A series of inns on the Main Road that survive today, if much altered, were established in the 17th century: the White Hart Inn (today known as The Archers) and the Ship Inn. The adjoining buildings to the White Hart, Nos.202-210 Main Road, likely date to the late 18th or early 19th century, and no.224 Main Road dates to the early 18th century, all with established shop fronts at ground floor level.



Lithograph of Hare Street 1890, by Alfred Bennett Bamford. The White Hart, now The Archers, is on the right. (Havering Libraries-Local Studies)

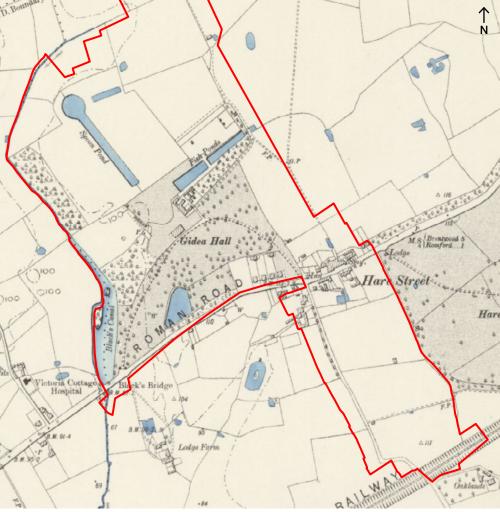
<sup>(2024) &#</sup>x27;Gidea Hall', in Lost Heritage. Available at: http://www.lostheritage.org.uk/ houses/lh\_essex\_gideahall.html

Gidea Hall was rebuilt in 1720 by Sir John Eyles, who also created a formal ornamental parkland for the estate, including a lake, fishponds and large water feature known as Spoon Pond. In 1776 the Benyon family, then-owners of Gidea Hall, commissioned James Wyatt to design Black's Bridge over Black's Canal where it met the road as part of the growing estate.

Gidea Hall } Page atermai **Havering Libraries-Local Studies** 

Extract of the 1805 OS map, surveyed in 1790, showing Gidea Hall and Hare Street. The western perimeter of Hare Hall can be seen to the right of the image. (Havering Libraries-Local Studies)

In 1839 the Eastern Counties Railway was laid, cutting through the Hare Hall estate land south of the Main Road, but no station was built and the area remained largely rural, dominated by estate parkland even as the nearby Romford expanded ever more rapidly. However, with the coming of the railway the value of land for suburban development would soon outstrip the value of country estates, and Gidea Hall was sold to a development company in 1883. The below 1895 Ordnance Survey map illustrates the extent of development by the end of the 19th century.



1895 OS map (surveyed). The distinctive Spoon Pond can be seen in the upper left corner of the map, and the railway line in the lower right corner. The 2024 conservation area boundary is indicated in red. (National Library of Scotland)

Sir Herbert Raphael bought the estate following its second failed auction in 1897. Raphael, a prominent liberal politician and member of the newly formed Romford Golf Club, had trained as a barrister and had twice failed to be elected as the Liberal MP for Romford in 1892 and 1897, subsequently winning a seat in Derbyshire (south) 1906-1918.

Upon purchase of Gidea Hall, Raphael immediately donated 90 acres to the east of the estate to the Romford Golf Club as a course, donating a further 15 acres of the northwestern corner to the council in 1902 and selling an additional section of land, including the Spoon Pond, which formed the present-day Raphael Park.

Page 189

Sir Herbert Raphael, 1906. (Wiki Commons)

#### 3.3 The Garden City Concept

The rapid urbanisation of the late-19th century had led to unprecedented social and economic problems in towns and cities laid out over haphazardly adapted plots and crowded streets, or long, uniform terraces of high density and low individual character. The growing population of middle-class families also presented a demographic who could afford to rent a new kind of housing, but without the capital wherewithal to build it themselves.

The concept of a Garden City was one of the radical urban planning concepts to emerge in response to this, a movement founded by Ebenezer Howard in 1898, which promoted a vision of well-ordered, spacious, satellite communities outside

of town centres. Its founding theories were tied closely to ideas of the Arts and Crafts architectural movement and the revival of vernacular architecture. Gaining worldwide acclaim, important models emerged in the early decades of the 20th century, including Hampstead Garden Suburb in 1907.

Models of plans for neighbourhoods of quality, affordable homes shared a few key elements, as illustrated in the diagram below; often circular, they centred on a civic nucleus of a public park, buildings and shopping facilities, local employment, accessible transport and strong cultural, recreational and shopping facilities, resulting in a suburb as self-sufficient as possible.

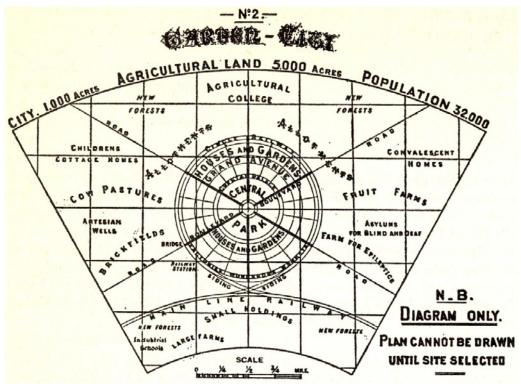


Diagram of the Garden City by Ebenezer Howard, 1898 (Wiki Commons)

#### 3.4 The Gidea Park Estate

A development company was set up by Raphael and two fellow Liberal MPs, Charles McCurdy and Tudor Walters, with the goal of developing a Garden Suburb akin to Hampstead Garden on the remaining Gidea Hall estateland.

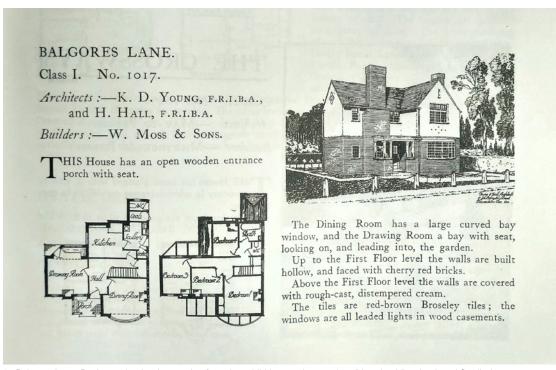
One hundred and twenty-one architects answered the developer's call for designs for the Romford Garden Suburb Gidea Park, each providing a three or four bedroom house that could meet the following brief:

"to demonstrate to housing and public authorities, to builders and to the public generally, the improvement in modern housing and building due to scientific knowledge, the revival of the Arts and Crafts and the progress of the garden city movement, and by doing so to assist the raising of the standard of living not only in the outer metropolis but throughout Britain."02

This group included most of the influential figures of the later Arts & Cafts movement – Barry Parker, Raymond Unwin, M. H. Baillie Scott, Fibip Tilden, and Clough Williams-Ellis. The planned development comprised an informal townscape grid varied by the deliberate kinking of roads to avoid important trees, and the incorporation of existing estate features like the Fish Ponds at Gidea Hall.

Between July 1910 and June 1911 159 houses and cottages were built to the design of these architects, and in 1911 an exhibition was run, drawing investors, house hunters and developers in via the newly built Gidea Park railway station. A map of the exhibition on the following page illustrates how houses had been constructed on plots spaced across the entire area, including streets south of Main Road as evidenced by plans detailing specific houses along Balgores Lane. Buyers could buy one of these houses, one of the generously sized building plots or have a house designed for them.

Styles of building varied, but nevertheless tended towards the picturesque Tudor or neo-Georgian, with the occasional exaggerated vernacular detail.



31 Balgores Lane, Design and artists impression from the exhibition catalogue, 1911. (Havering Libraries-Local Studies)



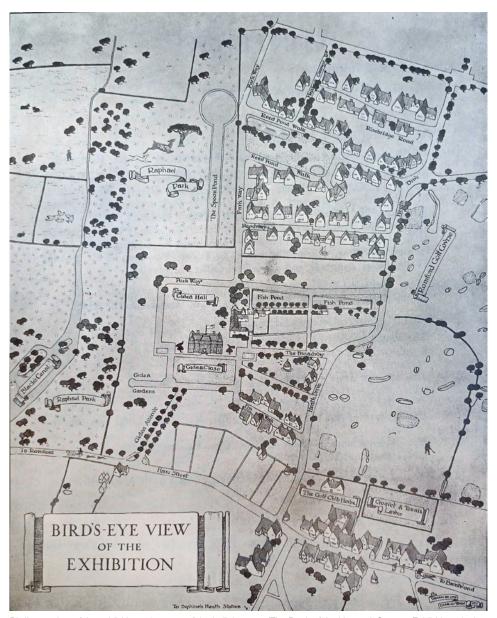
Balgores Lane, 1950s'(Havering Libraries-Local Studies)



45-48 Heath Drive, 1911. Photos of four large Neo-Georgian houses by Ronald P. Jones. (Havering Libraries-Local Studies)



The village green at Reed Pond Walk' (Havering Libraries-Local Studies)



Bird's eye view of the exhibition, 1911 map of the built houses. (The Book of the House & Cottage Exhibition 1911)

The garden's suburb's original plan included a nucleus around the existing historic hamlet of Hare Street, and a new church and shopping centre. The latter was never fully realised, nor were plans to extend the development northwards beyond the newly built Eastern Avenue roadway, or eastwards beyond the Golf Course. The outbreak of WWI interrupted the full development plan of the estate; the below Ordnance Survey map illustrates the extent of development by 1914.

Page 192

1914 (surveyed) OS map. The conservation area boundary is indicated in red. (National Library of Scotland)

While the early plan had incorporated Gidea Hall as part of the estate, by the 1920s following its sporadic use by the War Office and as a resident's club, it had fallen into disrepair. Following a failed bid to sell it as a residential property it was demolished in 1930, leaving only the wall, railings and gate from its 18th century park entrance.



Contrasting view of 3 Gidea Close and Gidea Hall to the east, 1920s, prior to its demolition. (Havering Libraries-Local Studies)

A second "modern homes" competition and exhibition held in 1934 intended to sell plots south of Eastern Avenue and produced 35 houses, with one genuinely contemporary design by Francis Skinner of Tecton at 64 Heath Drive. By this time the concept of a garden suburb had waned in favour of the merits of ribbon development, with smaller scale speculative housing – some comprising conventional inter-war designs – infilling the remaining unused plots. Whilst this was reflected in the 1934 linear arrangement of building frontages

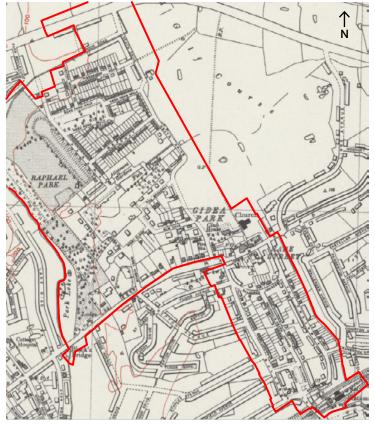
along new streets, the importance of the site's verdant setting on the outskirts of town and its direct relationship to the ideals of quality suburban living remained a key consideration in the new development's design.

The 1938 Ordnance Survey map below illustrates this second wave of construction, as well as new streets of ribbon development around the Gidea Park core to the south.

The general trend of modernising town centres and "zoning" development pressures of the latter 20th century likely drove the formation of the Gidea Park and District Civic Society in 1968, which undertook an extensive survey and report of the area. In 1970 the areas comprising the 1911 Romford Garden Suburb Exhibition and the 1934 Modern Homes Exhibition were adopted as the Gidea Park Conservation Area.



View from 64 Heath Drive, 1934



1938 (surveyed) OS map, showing many of the 1934 exhibition homes in situ. The conservation area boundary is indicated in red. (National Library of Scotland)



This section provides analysis and assessment of the character and appearance of the conservation area and the way this contributes to its special interest. It considers the character of the conservation area as a whole, addressing different elements of character including spatial analysis, setting and views, public realm, and architectural forms, materials and details.

## 4.1 Location, Topography and Geology

Gidea Park is situated in the centre-north of the London Borough of Havering, approximately 28km east of London centre and 10km north of the River Thames. Hare Street, the estimated centre of Gidea Park, is approximately 1.5km east of Romford, the medieval market town.

A118, known as the Main Road runs through the centre the conservation area from southwest to northeast, and no of the principal and historic throughfares between Essex and London. The Great Eastern Main Line railway is leated to the south of the conservation area, also extending throughfares to northeast; its railway station, Gidea Park, forms the southernmost point of the conservation area. There is one local waterway, the Black's Canal or Black's Brook, a small tributary which forms a large water feature within Raphael Park and feeds the Fish Ponds.

Area topography is relatively flat, but with gentle hills towards the north. The northern part of Havering is a diverse landscape with an agricultural character, interspersed with woodland, dissected by rivers and influenced by urban areas. Gidea Park forms part of the historic estate of Gidea Hall and was largely used as fertile parkland up until the early 20th century. The bedrock geology of the borough is largely London Clay Formation which is overlain by a series of gravel terraces.<sup>01</sup>



Aerial image of Gidea Park's location in its wider surrounding context. The conservation area is outlined in red.

Oxford Archaeology (2024) 'Archaeological Priority Area Appraisal: London Borough of Havering'. Available at: https://www.havering.gov.uk/downloads/file/6708/ havering-archaeological-priority-areas-report

#### 4.2 Archaeology

Although not always a visible part of the conservation area, archaeological remains can contribute considerably to our understanding of how the area has developed.

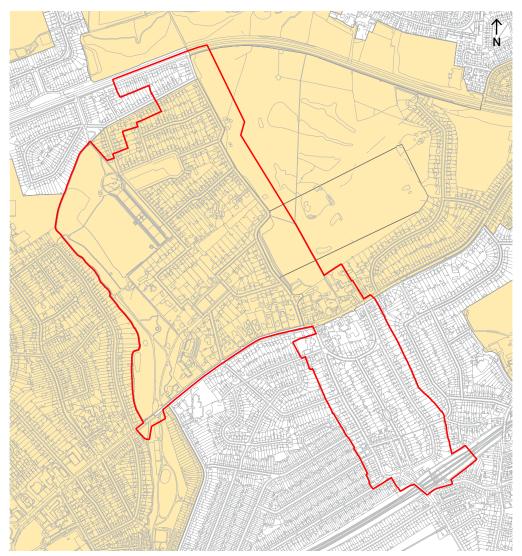
Due to the area's historic proximity to the Roman road and the medieval market town of Romford, there remains significant potential for further discoveries. Additional finds may provide further knowledge relating to the area's pre-20th century evolution and development, which would possibly contribute to the special interest of the conservation area.

There is one scheduled monument within the conservation area, a section of Roman Road within Gidea Park Golf Course. In considered a designated heritage asset of the highest inficance, and the impact that a proposed development may have on a Scheduled Monument and its setting is a material consideration in the planning process. Works possically affecting a Scheduled Monument require Scheduled Monument Consent from the Secretary of State for Digital, Culture, Media and Sport via Historic England.

The Roman Road scheduled monument is also classed as a Tier 1 Archaeological Priority Area (Havering APA 1.2), as it main contain nationally-important remains of a Roman Road, though excavation in 2002 uncovered post-medieval material which suggests the road may form part of the former drive associated with Gidea Hall.

The conservation also comprises two Tier 2 APAs, or areas which hold specific evidence indicating the presence or likely presence of heritage assets of archaeological interest. These include Havering APA 2.8, comprising the site of the former Gidea Hall and its estate, and Havering APA 2.24, comprising the site of the former London to Colchester Roman Road.

Further information about these APAs can be found by consulting the Archaeological Priority Area Appraisal for the London Borough of Havering (2024), available online.



Map showing the coverage of Archaeological Priority Areas within the Gidea Park Conservation Area, indicated in yellow.

#### 4.3 The Setting of the Conservation Area

The setting of the Gidea Park Conservation Area has been considerably shaped by transport infrastructure and the continued suburban development.

### Suburban Setting

It is surrounded to the west, south and southeast by slightly later suburban housing, comprising mostly semi or detached villas with a comparatively tighter plot pattern and more urban public realm than the generous spatial arrangement which forms a hallmark of the conservation area. Whilst generally of more standard architectural detail and massing, these later streets do much to maintain the conservation area's quiet, largely residential character, often to an insular effect.

Romford Golf Club extends from the conservation area condary to the east, forming a key feature of townscape highly visible from Heath Drive. It provides openness interspersed with verdant planting which contribute strongly to the character of the historic garden suburb.

The Eastern Avenue (A12) dominates the conservation area's setting to the north and northeast, presenting a hard stop to its network of streets and parkway. The noise from the busy roadway considerably impacts the area at its outer limits, and from across Romford Golf Club. The railway line also forms a key element of setting to the south of the conservation area, but as this predated much of the area's development and adjacent streets were designed with it in mind, its impact is less abrupt.

#### **Open Setting**

There is an appreciable shift between the suburban character of the conservation area and areas of open, semi-rural character further afield to the north where a slight rise allows for long views to mature woodland and the distant Grade I listed Bower House, an early 18th century red brick country house set within its own parkland.



View north out of Gidea Park Conservation Area from Parkway, including view of Bower House in the distance.

#### 4.4 Important Views

All views which take in heritage assets, whether designated or not, are important and contribute to the understanding and experience of the Conservation Area. As a consequence, the views considered in this section are not intended to be a comprehensive set. Local views are identified on the map included in Section 4.5.

Views across the conservation area are often limited by its historic layout along meandering street lines and tree-lined avenues. Thus, the conservation area is generally experienced through incidental, kinetic and transitional views which constantly change as one moves along streets.

The longer vistas along relatively straight stretches of road strate the juxtaposition between development and open land as designed, including views looking roughly north and south along Heath Drive, with the golf course to the east, and Parkway, with Raphael Park to the west. The streets connecting the two were laid out in a informal, meandering pattern which echoes their historic variety of buildings styles and architectural details across a network of picturesque, intimate neighbourhood views.

South of Main Road, longer-range views north and south along the key corridors of Balgores Lane, Squirrels Heath Avenue and Crossways are also picturesque, featuring treelined verges.

Views leading out of and into the conservation area are also important as they help to orient and delineate the conservation area within and from its setting. Due to the level topography of the immediate setting these views are generally limited to southwest and northeast views along Main Road, looking onto Heath Drive and the historic Hare Street.



View northeast into Romford Golf Course, from the junction of Heath Drive and the entrance driveway.



View from west corner of Balgores Lane's junction with Main Road, looking east.



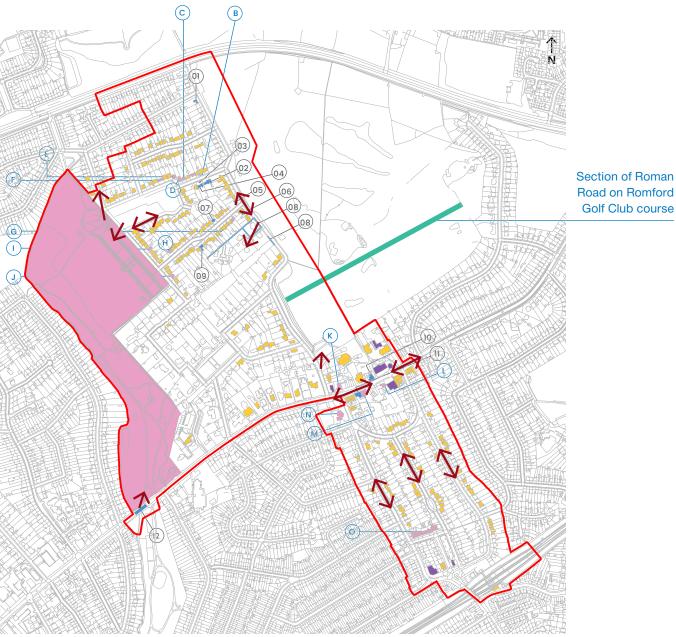
View from east end of Main Road, looking west into the conservation area.

## 4.5 Architectural Interest and Heritage Assets

The character of the conservation area is best expressed through the group value of its many qualities, and due in part to its incomplete historic development, there are few individual buildings which play a leading role in establishing the character of the area. Rather, the conservation area's group of locally and statutorily listed buildings are most representative of the its qualities.

There are 13 statutorily listed buildings in the conservation area, 19 locally listed buildings (Nos.1-6 and 7-12 Hare Lane counted as one) and one scheduled monument. Additional buildings are identified as positive contributors to the conservation area for their architectural or historic interest, the latter comprising exhibition buildings or those by exhibition architects. Sites presenting opportunities for enhancement are indicated. These, together with key views identified in 5 are marked on the adjacent plan.





Map indicating the location of all heritage assets, positive contributors to the conservation area, and areas for enhancement.

Buildings judged as a positive or negative contributor were initially identified by the 2008 CAA, and reviewed as part of site analysis undertaken in September 2024.

#### 4.6 Townscape and Spatial Analysis

The spatial character of Gidea Park is one of generous suburban spaciousness; roads with wide verges frame generous plots, with houses often set back behind front gardens. The historic Main Road divides the conservation area into two sections, with development to the south characterised by a large loop and three, long parallel avenues culminating at the railway station. Plots in this southern section are regularly laid out in a grid pattern, generally smaller than those to the north but maintaining a sense of spaciousness thanks to wide roads, planted verges and modest front gardens.

Street pattern north of Main Road is bounded by Heath Drive and Parkway, two avenues running roughly north to south the ween the golf course to the east and Raphael Park to the st. Other roads run between these two avenues indirectly, with deliberate, meandering changes in direction. Houses in this northern segment tend to occupy generous plots. The plot grain north of Risebridge Road becomes slightly tighter, the 1930s houses facing Eastern Avenue with the smallest plots. The conservation area ends somewhat abruptly at Eastern Avenue, a four-lane A-road, though mature greenery of the Risebridge Golf Course to the north of the A-road opposite the conservation area softens the impact of this to a degree.

The street layout as designed in 1910 incorporated some existing natural and architectural features into the townscape, and added others. These elements, including the former parkland walls and gate piers to Gidea Hall, the Hall's former fish ponds appreciable from Heath Drive, the tennis club on the site of the Hall's former tennis courts and the copse at Reed Pond Walk, remain legible and add substantial interest to the townscape.

Main Road continues to follow its historic path as an arterial route at the heart of the conservation area. Its spatial character is linear, with a mixed clusters of historic and modern development dispersed along both sides.



Crossways looking south from Main Road



Curve at base of Balgores Lane and Crossways



Meanders at Reed Pond Walk

### 4.7 Open Space, Parks and Trees

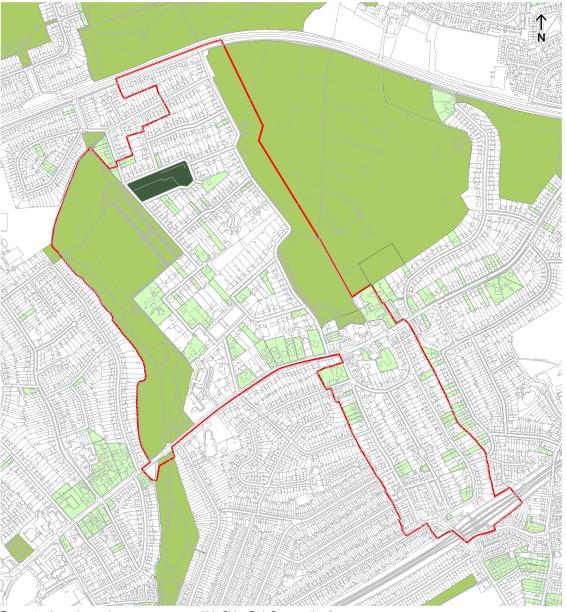
The conservation area's green spaces and trees form a key part of its history and significance as an early-20th century garden suburb. Greenery features across the conservation area, in front and rear gardens, street verges and open spaces, and makes a highly positive contribution to its character and appearance.

The area's largest green space is Raphael Park, which forms much of conservation area's western boundary and serves as an important community amenity. It features mature trees, open space, sports and recreational facilities, pathways and Black's Canal at its southern end terminating at Black's Bridge. The park also adds historic interest as a remnant of the former Gidea Hall parkland which predates the capservation area.

mford Golf Course is an open space which forms much of the conservation area's eastern boundary and setting. It also empys active use by the community.

There are a significant number of high-quality mature trees within these green spaces as well as in a series of other private and public spaces across the conservation area. This includes those within the densely wooded corpse bounded by Reed Pond Walk, planted on wide verges to create tree lined avenues and within private gardens. These make a significant contribution to the character and appearance of the conservation area.





Tree protection orders and open green spaces within Gidea Park Conservation Area

While views across Romford Golf Course open space from within the conservation area are curtailed to a degree by its wooded western boundary, a sense of openness remains undiminished which adds a significant contrast to the adjacent urban grain of residential streets. Views across the open space and water features within Raphael Park are long, appreciable both from streets bounding the space as well as within it. Public realm within the park such as seating and play areas encourages dwell time within the space.

The copse at Reed Pond Walk is identified as a village green by the London Borough of Havering, and is an original feature of the 1910-11 Gidea Park exhibition development.

There are several protected open spaces within the immediate setting of and visible from the conservation area which add to the character of a green environment, including Risebridge to Course to the north, the full expanse of Romford Golf surse to the east, and Lodge Farm Park to the south of Raphael Park.

Tree Preservation Order (TPO) areas are designated across full plots throughout the conservation area, indicating the importance of trees in both front and rear gardens. Designated Tree Preservation Order (TPO) areas in Gidea Park may be seen on page 27 and further details of the individual TPOS can be found on the Council's interactive planning map, see the Further Information and Resources section.



The copse at Reed Pond Walk, a village green



Raphael Park from Parkway



South end of Raphael Park overlooking Black's Canal

#### 4.8 Public Realm

#### **Street and Pavement Surfaces**

Street surfaces throughout the conservation area are tarmac, with granite or concrete kerbs. No historic pavement surfaces appear to survive. Most are in tarmac; simple square concrete pavers are also found throughout the conservation area, but sporadically. An exception to this is a recently refreshed area of public realm at the intersection of Balgores Lane and Crossways which has been laid in granite pavers.

Pavements are lined with narrow bands of grass verge between walkway and road in some residential streets to the south and north of Main Road, but this is not consistent.



Street and pavement surfacing on Balgores Crescent.

#### Street Furniture, Lighting and Wayfinding

Street lamps are prevalent throughout the conservation area modern but in a largely uniform historic profile. There are some instances of modern, more utilitarian lighting in higher traffic areas such as roads near the station and Main Road, and sections of Balgores Square.

Seating and planters are limited to commercial areas at the southern end of Balgores Lane and Main Road. These occur in occasional clusters which encourage dwell time and generally make a positive contribution to the character of the space, though profiles and materials lack consistency.

There are a series of park benches within Raphael Park, of a uniform design that contribute positively to the character and dwelling time of the open space.

Other elements of street furniture include bollards, which are found throughout the conservation area and are particularly prevalent along Main Road, in modern, utilitarian profiles. There is little to no cycle parking.

Some modest wayfinding signage has been implemented by way of double-sided signboards near Balgores Lane and along Main Road which illustrate the boundaries and history of the conservation area. Street signs are at a mix of heights; those at low height are often situated near hedges at corners.



Seating and amenity space within Raphael Park.



View of public realm on Balgores Lane, near to the train station.

#### 4.9 Building Uses

The conservation area's buildings are principally in residential use. A concentration of buildings in commercial and office use is present along Main Road and near Gidea Park railway station at the south end of the conservation area, which are representative of the area's conception as a garden suburb. Individual or small clusters of buildings in other uses are also scattered throughout the conservation area. Each use type is described below.

#### **Residential Buildings**

Residential buildings across the conservation area vary in size and decorative style, owing to the broad range of styles deployed by the 122 architects responsible for designing buses for the Gidea Park exhibition. These comprise mostly signi-detached and detached houses, with slightly larger dwellings found to the north of the Main Road, and generally signiler to the south.

A small number of residential buildings within the conservation area have been erected from the late-20th century onward, including the developments of Sycamore Grove and Mead Close, which have infilled plots northwest of the Gidea Hall fish ponds between Meadway to the northwest and Heath Drive to the east, though these are generally concealed from wider conservation area views. Several larger residential buildings in multiple occupancy are situated along the north side of Main Road, as well as Gidea Lodge, a complex of retirements apartments between Balgores Crescent and Main Road, also largely concealed. The majority of these later residential buildings lack the character of the conservation area's historic homes, but have a neutral visual impact for the most part.



Semi-detached houses on Crossways



Detached houses, Squirrels Heath Avenue



Detached houses, Parkway



Detached house, Reed Pond Walk

#### Retail and Commercial Leisure Buildings

Retail and commercial leisure buildings are contained to Main Road, and to the section of Balgores Lane adjacent to the railway station, with the exception of recreational facilities which are embedded within or adjacent to residential streets.

Commercial buildings on Main Road are of mixed scale of three stories or lower, and mixed dates, featuring the oldest buildings within the conservation area dating from the 17th century up to those of the present day. A small number are in office use, or with offices at upper floors. Together this creates a lively corridor with an active footfall alongside the busy traffic of Main Road.

Commercial buildings on Balgores Lane near the station include a small number of purpose-built commercial buildings dating to 1911, a curved inter-war terrace including ground floor shopfronts with flats or offices above, a single building with a ground floor arcade, and a purpose-built garage.

Recreational (commercial leisure) facilities are the only commercial buildings found outside of these two areas. The Romford Golf Club Clubhouse retains its original use from its founding in 1894 and is a landmark property at the southern edge of the golf course, close to Heath Drive. Gidea Park Lawn tennis club is situated within the former front lawn of Gidea Hall, and the small contemporary building and tennis courts are framed by tall, mature evergreen hedges, providing a pleasant break within the suburban plan. Another tennis club and courts within Raphael Park are situated within the Gidea Hall landscape feature Spoon Pond, since drained and repurposed.



The Ship public house, listed at Grade II, on the north side of Main Road. It is presumed to date to the 17th century, if much altered.



Romford Golf Club Clubhouse.

## **Education Buildings**

There are several schools within the Conservation Area, near to the Main Road. The Gidea Park Preparatory School and Nursery School resides within the locally listed Balgores House, a converted Victorian country house. It presents an important local landmark, as a highly visible and attractive Victorian building near a principal intersection.

A pre-school is located within the Friends Meeting House at 7 Balgores Crescent, a mid-20th century single storey building set discreetly off Balgores Crescent. A nursery school at 69 Main Road is within a heavily altered 20th century house set behind large front car park.

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Balgores Lane façade of the Gidea Park Preparatory School.

## Places of Worship

Gidea Park contains two places of worship, both near to the Main Road; the Friends Meeting House at 7 Balgores Crescent, and the Anglican church St Michael & All Angels set north of Main Road behind a large drive and lawn court.

St Michael & All Angels is a large, Inter-war red brick building with a prominent bell tower, visible from Main Road but set back by a long drive, lawn and mature greenery. A rear courtyard contains a series of community spaces managed by the church including the Main Hall, a large, single volume community space dating to the interwar period with a characterful façade, heavily damaged by fire in 2022.





View of St Michael & All Angels from Main Road

#### 4.10 Scale and Massing

Residential houses, which comprise most of the conservation area's buildings, are generally two-storeys beneath pitched roofs, with some additional attic storeys and dormers, or single storey extensions. These rows of villas are spaced evenly within their own plots, often set back from the road by a generous front lawn and with a gap between neighbouring properties. A historic exception is 1-6 and 7-12 Hare Hall Lane, a robust four-storey block of flats with offices at ground floor, of 1912 with later 1930s infill. This rises prominently against a backdrop of smaller houses.

Commercial and professional buildings within the two centres on Main Road and near to the station feature a handful of the acced buildings. These are two to three storeys in height varied in date and style. On Main Road, these terraces are interspersed with detached or semi detached buildings enerally two storeys, with an equally broad range of dates architectural styles, some set back from the pavement by a paved forecourt, others with frontages flush with the pavement edge. Near to the station the buildings are a similar mixture of terraced or block buildings, of one- to three-storey storeys, dating to the early decades of the 20th century. This rich mix of forms creates a lively street scene, in sharp contrast to the relatively consistent residential plots throughout the rest of the conservation area.



View of Inter-war parade at intersection of Balgores Lane and Crossways.

#### 4.11 Materials

Dwelling houses share elements of a common palette of materials, despite the architectural individuality that characterizes the area. The use of red brick or render is common, as are instances where the two treatments are combined to articulate different storeys or bays of a dwelling.

The use of timber casement windows is prevalent, often with small pane glazing, with examples of small stained-glass feature windows found across the group. Decorative brickwork has also been used frequently to add interest to features such as window surrounds chimney breasts or entranceways, using polychromatic, rubbed or broken brick mosaic. Clay tiles are often integrated into brickwork or to gables for decorative effect, as are panels of timber board or untreated wood.

Roofs are clay tile, with occasional use of grey slate. Modern tile has replaced historic in places, however historic roof tiles remain prevalent.

Front gardens would have originally been soft landscaped with hedged or low fenced boundaries. Front gardens have increasingly been adapted for car parking with boundaries also consequently eroded.



Detail of brickwork at St Michael and All Angels church



Detail of window, roof and façade materials used on Reed Pond Walk

#### 4.12 Architectural Details

#### **Architectural Details**

A substantial amount of original early 20th century architectural detail survives to principal elevations across the conservation area. These details are enormously varied, according to the variety in architectural type.

#### Rooflines

Complex roof profiles are created with steep or irregular pitches, as well as prominent and characterful chimney stacks, gables and dormer windows.



Detail of chimney stack of No.57 Balgores Lane

#### **Decorative Façade Treatments**

Ornamentation has been applied to the principal façades of individual buildings which adds considerably to their individual character, provides an attractive variety to the street scene, and a tangible reminder of the area's historic development as a showpiece of architectural style.



Detail of decorative plasterwork to No.36 Reed Pond Walk



Detail of subtle decorative brickwork above main entrance at No.32 Reed Pond Walk

Polychromatic brickwork, rubbed brick, hung tiles, timber partition frontages and decorative plaster moulding are some of the many techniques used to ornament façades.



Detail of polychromatic brickwork set within the chimney breast at No.74 Parkway



#### 5.1 Introduction

Whilst the majority of buildings within the Gidea Park Conservation Area principally relate to the area's development as an early-20th century residential garden suburb, there are differences in architectural detail, arrangement and townscape which form distinct character areas.

The following identifies and provides analysis of each of the different character areas within the conservation area, as shown on the adjacent plan.

The contribution made by individual buildings or sites is described in the map and key provided for each character area assessment on the following pages. A description of the key categories is as follows:

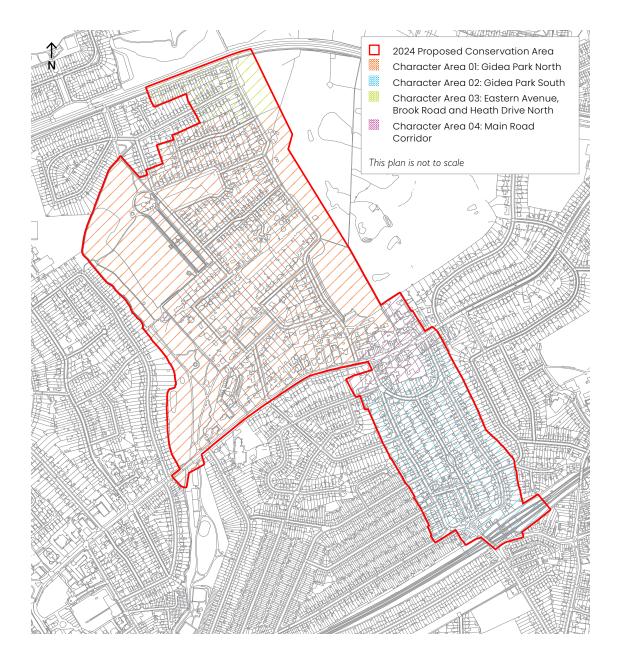
central government for their special architectural and historic interest thus are provided statutory protection under the Planning (Listed Buildings and Conservation Areas) Act 1990.

**Scheduled Monuments** are nationally-important archaeological sites included on the National Heritage List for England, and thus are provided statutory protection as designated heritage assets.

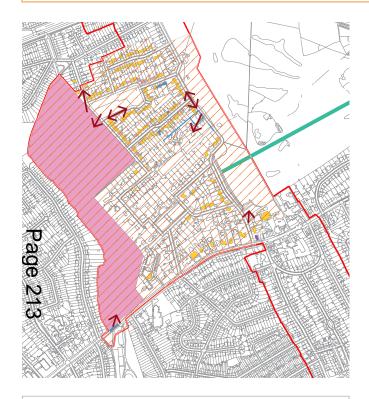
**Locally Listed Assets** are designated by the local planning authority for the positive contribution they make to local character and sense of place. They are not offered the same protection as statutorily listed buildings, but are material considerations in planning applications.

Positive Contributors are buildings which are not statutorily nor locally listed, but nevertheless make a notably positive contribution to historic townscape. These buildings may merit consideration in planning applications that impact them directly or indirectly.

**Opportunities for Enhancement** are buildings or sites that comprise elements which detract from the character and appearance of the conservation area. Their improvement or replacement is encouraged.



#### 5.2 Character Area 1: Gidea Park North



- Character Area 01: Gidea Park North
  - 2024 Proposed Conservation Area
- → Key Views
- Scheduled Monument
- Statutorily Listed Building
- Locally Listed Asset
- Positive Contributor
- Opportunity for Enhancement

This plan is not to scale

#### 5.2.1 Street and Plot Pattern

Gidea Park North comprises the area north of Main Road which was laid out as part of the 1910-1911 garden suburb exhibition. Its principal access from the south is via Heath Drive, which continues northwest, bound by the Romford Golf Club course to the east. Ancillary streets extend in a loose grid as they make their way southwest toward Raphael Park from Heath Drive, often meandering, turning at right angles or, in the case of Reed Pond Walk, fully looping, to create an informal townscape pattern and sense of intimacy. By contrast, Parkway and Heath Drive face outward over open space, reflected in their generous frontages.

Plot sizes north of Main Road are generous, featuring deep rear gardens, front gardens and mature planting; this promotes a cohesion of setting and townscape character. Area features which predated the 1910-11 townscape plan were incorporated into its layout, including the walls and gates to the parkland of Gidea Hall, its fish ponds, tennis courts and several trees; bends in streets were deliberately made to circumvent the latter. Most remain legible today and are important fixtures within the townscape that contribute to the understanding of the site.

#### 5.2.2 Important Views

Long-range views are generally limited by the informal street pattern; instead, the character area is generally experienced via incidental and kinetic views appreciated as one moves through the townscape. These views at closer range help to draw attention to the character area's buildings and architectural details.

The long and mid-range views that do occur, including up and down Parkway, looking outward (to the southwest) and inward (to the northeast) across the expanse of Raphael Park and southwest across the fish ponds from Heath Drive are important, as they help establish the context of conservation area within open spaces. Similarly, outward views looking north and east across the Romford Golf Club course, itself an original feature of the 1910-11 townscape, are also key.



Meanders at Reed Pond Walk



View looking northwest along Parkway

#### Character Area 1: Gidea Park North

#### 5.2.3 Open Spaces, Trees and Public Realm

Both Raphael Park to the west of the character area and the Romford Golf Club course to the east are designated open spaces which allow views outward and provide buffer from development and traffic within the immediate setting of the conservation area. Both comprise features of active recreation grounds and mature planting; within the golf course informal clusters of trees in the near, middle and long distance provide a countryside-like, outer-fringe feel that is key to understanding the conservation area's context as a garden suburb.

The copse at the west end of Reed Pond Walk, designated a win green, provides a swathe of verdant landscape within the urban grain of the street pattern that adds an air of seclusion; the green is an original feature of the 1910-11 plan of high heroric interest. The prevalence of Tree Preservation Orders (TPOs) to full plots reflects the importance of mature trees in front and rear gardens to area character.

Streets are generally broad, paved in tarmac with granite or concrete kerbs. Pavements are also generally in tarmac with modern concrete pavers in places; patchwork repairs of varying quality are evident. Narrow grass verges commonly run between streets and pavements, though not consistently. Signage is generally limited to street signs at high or low level, the latter often adjacent to corner hedges; this goes far to keep visual clutter within the street scene at bay. Streetlights throughout the area are metal, in a traditional profile with glazed lanterns; consultation has indicated that a number of these are in poor condition and in need of repair. Seating is only found in Raphael Park, and there is no provision of cycle parking within the character area.



Looking west over Raphael Park from Parkway



Copse at Reed Pond Walk

#### Character Area 1: Gidea Park North

## 5.2.4 Building Types and Uses

Buildings within Gidea Park North are principally residential, comprising mostly detached but some semi-detached houses and some larger buildings in multiple occupancy along the north side of Main Road, including a modern development at Royal Jubilee Court. A cluster of large, Victorian and Interwar houses (some rebuilt) west of the junction of Main Road and Heath Drive have been converted for use as a nursery, social club and care home.

A handful of buildings, including the Romford Golf Club clubhouse – an original fixture of the garden suburb development – and a modern clubhouse for the Gidea Park Lawn Tennis Club along Gidea Close are in recreational/leisure use. A modern single-storey building at the southern end of Raphael Park functions as a restaurant with additional access from Main Road.

#### 5.2.5 Scale, Materials and Architectural Details

The houses within Gidea Park North erected as part of the 1910-11 exhibition competition were largely designed as either large detached houses of Class I, or as detached cottages of Class II. This difference in massing and scale remains legible, with Class I houses mostly constructed along Heath Drive, Reed Pond Walk and Parkway, and Class II cottages of a more modest scale principally built in Meadway and Risebridge Road. Later infill and modern development has generally reflected the scale of neighbouring houses, with some exceptions.







Class I detached houses in Parkway

#### Character Area 1: Gidea Park North

The architectural styles applied in 1910-11 were indicative of the period, from Arts and Crafts to Neo-Tudor and Georgian; no two houses were alike, and the eclectic sampling of early-20th century domestic design which survives today is of high significance.

Houses are generally of two storeys beneath pitched or hipped roofs; a mansard-style roof at 23 Reed Pond Walk is an exception. Roofs are predominantly in clay tiles apart from 45-48 Heath Drive, which are in slate and largely concealed behind parapets, and often feature dormers and sometimes gables. The variety employed across rooflines, forms and minneys adds substantial interest to this character area,

and makes a strong contribution to the character of the wider conservation area as a whole. Fenestration is often arranged horizontally, with window openings and glazing bar patterns often modestly-sized in proportion to their wider elevations. Most windows are timber casements; these have been inappropriately replaced with sashes or modern window arrangements in places. Fenestration pattern is on occasion broken up by exaggerated, tall window openings, or with striking decorative windows in leaded glass.

Materials are of notably good quality and generally comprise painted render, principally in white or cream but other colours have been applied in places, and handmade brick. Brickwork also is often employed to accent architectural features within otherwise rendered elevations, whilst decorative tilework draws the eye to doorways, porches and gables to a pleasingly bespoke effect.



Horizontal window arrangement with brick mullions, Parkway



Decorative window to return elevation, Heath Drive



Elevation treatments, Reed Pond Walk

#### Character Area 1: Gidea Park North

#### 5.2.6 Boundary Treatments

Boundary treatments vary by plot, but all convey the importance of front gardens to the suburb's historic design. They often comprise high or low hedges which contribute to a sense of enclosure; high hedges often continue between plots in rear gardens. In some cases traditional hedges have been replaced by modern planting. Low brick walls and timber fencing are also common; many of these are later replacements. Some cast-iron entrance gates survive within front gardens, replaced with inferior black-painted modern metal gates in places.

The historic garden walls to the form Gidea Hall demarcate the boundary between historic houses in Meadway and modern development to the south in Mead Close and Sycamore Grove. Gates and railings to Raphael Park along the Main Road entrance are also historic, in a charmingly eclectic profile.

#### 5.2.7 Audit of Heritage Assets

Statutorily listed buildings within Gidea Park North are all listed at Grade II and include 16 Meadway by Philip Tilden; 27 Meadway by van 't Hoff and Maxwell; 41 Heath Drive by

Raymond Unwin and Barry Parker; 43 Heath Drive by W. Curtis Green; 36 and 38 Reed Pond Walk by M.H. Baillie Scott; the sundial in front of 36 Reed Pond Walk; and the sections of boundary wall, railings, gates and gate piers to the former Gidea Hall along and to the west of Heath Drive. A section of Roman road which survives within the Romford Golf Club course is a scheduled monument.

Locally listed assets include Raphael Park; 23, 29, 31, 33 and 37 Reed Pond Walk; 1 and 36 Meadway, and 40 and 54 Parkway.

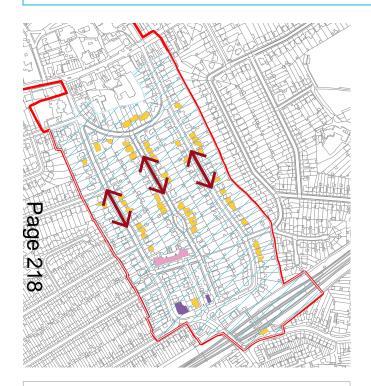


Hedge boundaries, Gidea Close



Raphael Park entrance gates and railings, Main Road

#### 5.3 Character Area 2: Gidea Park South



- Character Area 02: Gidea Park South
- 2024 Proposed Conservation Area
- → Key Views
- Scheduled Monument
- Statutorily Listed Building
- Locally Listed Asset
  Positive Contributor
- Opportunity for Enhancement

This plan is not to scale

#### 5.3.1 Street and Plot Pattern

The street pattern across the Gidea Park South character area comprises a grid formed of the three long north-south corridors of Balgores Lane, Squirrels Heath Avenue and Crossways, bookended by curves at Balgores Crescent to the north and the intersection of Crossways and Balgores Lane to the south, before the latter continues over the railway to Gidea Park Station. Hare Hall Lane is the only other cross-street, continuing between Squirrels Heath Avenue and Crossways as a footpath. Balgores Square remains an incomplete townscape feature at the base of Squirrels Heath Avenue, originally intended as a commercial and retail centre for the garden suburb. It now serves as a car park, encircled by tall hedges.

Balgores Lane is a key north-south vehicle route with some of the heaviest traffic in the conservation area. A number of residential streets lead west from Balgores Lane into the neighbourhoods forming the conservation area's setting. There is less permeability along the east side of the character area, with only Wallenger Avenue leading into eastern neighbourhoods.

Plots are generally narrower in this part of the conservation area in comparison to the residential area north of Main Road, with shallower front gardens. Plots in Squirrels Heath Avenue are somewhat more generous than those to the flanking streets, while those south of Hare Hall Lane are the most compact.



Footpath connecting Squirrels Heath Avenue and Crossways

#### Character Area 2: Gidea Park South

#### 5.3.2 Important Views

The longer grid pattern of early-20th century and Interwar housing offers contrast to the more informal townscape to the north of Main Road. Important views comprise those which provide vistas across this townscape arrangement of residential areas characteristic of Gidea Park, including north and south views along Balgores Lane, Squirrels Heath Avenue and Crossways.

#### 5.3.3 Open Spaces, Trees and Public Realm

The Gidea Park South character area has a more urban feel than the neighbourhoods to the north, in part due to the lack of pen spaces. Two modest triangular greens flank either of Balgores Crescent, but otherwise there is no publicly cessible green space. Tree Preservation Orders (TPOs) are in place across full plots in Balgores Lane and Crossways, and in Squirrels Heath Avenue. Mature trees are prevalent to attreets, however, framing views across the townscape and conveying the importance of greenery to the historic character of the garden suburb.

View south down Crossways, flanked by mature trees

A seating area with planters and young trees implemented at the southeast corner of Crossways and Balgores Lane north of the railway line provides a place to comfortably dwell as one enters the conservation area from the south. This is paved in granite pavers that continue eastward along Crossways to the Gidea Park station car park. Otherwise pavements are overlaid in a mix of modern concrete pavers within commercial zones. Residential area pavements are mostly in tarmac, interspersed with concrete pavers in places; no historic pavements remain. Streets are in tarmac, with concrete or granite kerbs. Narrow strips of grass verges remain in some residential streets, though often in fragments.

Streetlamps modern and utilitarian in profile within the commercial area at the southern end of the character area, around Balgores Square, along Squirrels Heath Avenue and along Balgores Lane. This has been replaced by streetlamps in a historic profile with glazed lanterns in Balgores Crescent and Crossways. There are two cycle hoops along Balgores Lane before it crosses the railway line at the southern end of the conservation area; otherwise these are limited to the area adjacent to the railway station entrance.



Mix of modern pavement, Crossways

#### Character Area 2: Gidea Park South

#### 5.3.4 Building Types and Uses

The Gidea Park South character area comprises mostly residential buildings comprising detached and semi-detached houses of two storeys. Detached houses dating to the 1910-11 exhibition are situated across Balgores Lane and Squirrels Heath Avenue interspersed with later Interwar houses, comprising some later houses by exhibition architects. A few larger buildings are in multiple occupancy as modest blocks of flats.

Commercial buildings are focused near the station and include a mently curving Interwar parade of ground floor shops with flows or offices above at the western corner of Balgores Lane ere it meets Crossways. Though generally nondescript, it reads strongly of the period in red brick; shopfronts are modern but most historic corbelled pilasters remain.

A c.1911 arcaded range at the southwest corner of Balgores Square with shops at ground floor makes a strong visual impression at the southern entrance to the conservation area; this is the only part of an original commercial development dating to the first exhibition which was meant surround the square to ultimately be completed. The broad mixed-use block comprising 1-6 and 7-11 Hare Hall Lane to the north of Balgores Square dates to c.1912 and is another incomplete commercial range with flats above, infilled by a 1930s block of flats. Ground floor units are much altered and are currently in office use.

A single-storey auto repair garage and dealership is located at the northeast corner of Balgores Lane at Nos.77 and 142, an odd insertion within an area of principally residential character. Another single-storey range immediately north of the railway line currently comprises three units in restaurant use.

#### 5.3.5 Scale, Materials and Architectural Details

Houses comprise the majority of buildings across the Gidea Park South character area. There is a lesser concentration of exhibition houses here, where they are principally found in Balgores Lane and Squirrels Heath Avenue, than in Gidea Park North, and therefore less cohesion. But a considerable number of homes date to roughly the same period and share similar materials and attention to detail. The contrast in form and architectural detailing is perhaps sharpest in Balgores Lane, where most houses along the west side south of Repton Avenue were erected after 1934.

Houses are principally of two storeys beneath hipped roofs in tile, which sometimes feature gables or dormers. Chimneys add liveliness to rooflines, but they are not as prevalent or robust here as in other parts of the conservation area; an exception is the composition of exhibition houses at 27-37 Squirrels Heath Avenue, where chimneys make a powerful impression.

Houses are principally in brick or in render, sometimes in a mix of both. Render is usually painted though occasionally left plain, and brickwork details are often employed to emphasise architectural features in otherwise rendered elevations. Windows traditionally comprised multi-pane timber casements; some survive, but most appear to have been replaced, sometimes in uPVC or with inappropriate glazing bar patterns. Some later accretions, including side wing extensions and enclosed front porches, detract from area character.



Prominent roofline at 27-37 Squirrels Heath Avenue



Mismatched window replacement, Balgores Crescent

#### Character Area 2: Gidea Park South

#### 5.3.6 Shopfronts

Shopfronts are located in the south part of the character area near the station. Most shopfronts are modern apart from 142 Balgores Lane within the corner Interwar range which is in its historic arrangement with an appropriately-scaled fascia and some period glazing, but other elements appear to be modern replacements. Original brick pilasters and fluted capitals survive between most units within the corner range. Some shopfronts here comprise traditional elements including stall risers, cornices and vertical elements to shopfront windows, but others are in full-height glazing with overlarge fascias and internally-lit plastic signage. Surface-mounted cabling and services also detract from the building's appearance.

icate brick pilasters appear to survive between the three that the single-storey commercial block opposite but are abscured by awnings and overlarge fascias; surface-mounted solices and rooftop plant are highly visible.

Shopfronts within the c.1911 arcaded range at 2, 3 and 4 Balgores Square also retain historic elements, including fluted pilasters, timber stall risers and recessed entrances; the entrance to No.3 has been brought forward. Shopfronts to the office units in Hare Hall Lane are fully modern insertions of little character.

#### 5.3.7 Boundary Treatments

Boundary treatments provide a sense of enclosure and protection to front gardens from the street and are an important historic characteristic of the area, particularly in longer street views; houses often appear over-exposed in instances where they are missing completely. Treatments often comprise low brick walls to front gardens, sometimes with stone coping and gates, and sometimes combined with hedges. Full metal railings are traditional but miss the mark within the context of the early-20th century development, where brick, timber or hedge treatments were more typical.

Long stretches of tall timber fencing to rear and side gardens present a hard, utilitarian frontage and detract from the street scene, as found in Hare Hall Lane, Balgores Crescent and at the southern end of Crossways.

Rear gardens are also often demarcated by hedges and mature trees.



Combined boundary treatment, Squirrels Heath Avenue

#### 5.3.8 Audit of Heritage Assets

Whilst there are no statutorily listed buildings within Gidea Park South, 1-6 and 7-12 Hare Hall Lane, sections of a mixed-use commercial block that dates to the original garden suburb but was never completed, is a locally listed asset and prominent feature of the townscape along Hare Hall Lane and Balgores Lane.



Intact timber window arrangement, Crossways

#### 5.4 Character Area 3: Eastern Avenue, Brook Road and Heath Drive North



- Character Area 03: Eastern Avenue, Brook Road and Heath
  Drive North
- 2024 Proposed Conservation Area
- → Key Views
- Scheduled Monument
- Statutorily Listed Building
- Locally Listed Asset
- Positive Contributor
- Opportunity for Enhancement

This plan is not to scale

#### 5.4.1 Street and Plot Pattern

The townscape in this northernmost part of the conservation area is dominated by Eastern Avenue and its four lanes of traffic, which abruptly severs it from its setting to the north. Pairs of semi-detached houses in Eastern Avenue are set back behind modest front gardens which slope down from street level and a lane for street parking. Gaps between pairs allow views of greenery to the rear.

The street scene changes as one turns south into Heath Drive, with the expanse of the Romford Golf Club open space to the east. Streets and pavements are generous, but otherwise the earlier ideals of the garden suburb are largely absent, replaced with ribbon development across tighter plots. Rear gardens, however, are spacious.



Semi-detached 1934 houses, Eastern Avenue

#### 5.4.2 Important Views

South and north-facing views into and out of the conservation area are appreciated from the northern end of Heath Drive, and take in the open space of Romford Golf Club to the east which is a key feature of its setting. This relationship to setting is also made legible in east-facing views from Brook Road. Kinetic views are more limited in this part of the conservation area due to the narrow plot grain.

#### 5.4.3 Open Spaces, Trees and Public Realm

The Romford Golf Club open space continues along the east side of Heath Drive as informal grassland with smaller trees, screened from view by larger trees along the roadside. No plots within the character area have Tree Preservation Orders (TPOs) applied. While mature trees are less prevalent here than in the southern parts of the conservation area, individual or small clusters of trees soften its more open feel, in some instances providing verdant backdrops when planted in rear gardens.

Roads are paved in tarmac with concrete kerbs, granite kerbs along Eastern Avenue. A strip of parking has replaced the grass verge in Eastern Avenue, demarcated from the pavement by a stretch of granite setts. Pavements along Eastern Avenue are in tarmac; others are in concrete pavers, interspersed with stretches of plain concrete.

Streetlamps in Eastern Avenue are tall and utilitarian, and relate to the A road. This changes at the north end of Heath Drive, where traditionally-profiled streetlights help to demarcate entrance into the conservation area.

#### 5.4.4 Building Types and Uses

All buildings within this northernmost part of the conservation area are residential, comprising mostly detached houses in Brook Road and Heath Drive, and semi-detached pairs in Fastern Avenue.

#### Character Area 3: Eastern Avenue, Brook Road and Heath Drive North

#### 5.4.5 Scale, Materials and Architectural Details

The houses along Heath Drive between Risebridge Road and Brook Road are all of two storeys, in render or painted brick. Massing and hipped and pitched roofs in tile relate to the buildings of the first exhibition to the south; otherwise historic details are clearly of the 1930s, including the modernist dual frontages at 64 Heath Drive. All but No.64 have later additions or accretions.

The 1934 exhibition houses in Brook Road form a striking composition, rising two storeys beneath flat roofs in render, brick or painted brick. Frontages are deliberately austere, though their simplicity has been considerably impacted by the loss of their original windows, as replacements are generally mappropriate profiles and materials. Later extensions and pretions such as porches and columns have also diminished of Heath Drive do little to relate to the original group.

Exhibition houses along Eastern Avenue are semi-detached pairs, also rising two storeys beneath flat roofs. Most are in red, yellow or cream-coloured brick, and some have been rendered. Original windows were in metal, but nearly all have been replaced in unsympathetic materials and profiles. Later accretions have obscured the legibility of original frontages across the range with a handful of exceptions, including 314 Eastern Avenue which survives largely intact to the front.

#### 5.4.6 Boundary Treatments

Historic photographs show that the 1934 exhibition houses were provided with simple timber fences as boundary treatments, none of which survive apart from a section of fence between 64 and 63 Heath Drive in its original profile. Most existing boundary treatments in Brook Road are low-level brick walls or hedges; in several cases, none exist altogether. The result is a much more open character to front gardens which considerably contrasts with the intimacy created by boundary treatments featured within the earlier part of the garden suburb. Hedges and low brick walls are employed along frontages in Eastern Avenue, offering a degree of privacy from the heavy traffic of the A road but without consistency.

#### 5.4.7 Audit of Heritage Assets

No.64 Heath Drive, a modernist dwelling of 1933-4 in reinforced concrete by Francis Skinner and Tecton is listed at Grade II.

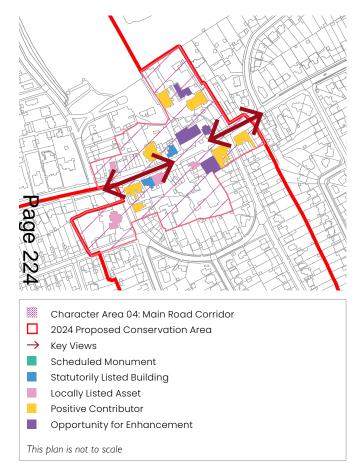


64 Heath Drive, listed at Grade II



1930s front elevation detailing, Heath Drive

#### 5.5 Character Area 4: Main Road Corridor



#### 5.5.1 Street and Plot Pattern

Main Road runs roughly east to west as a key thoroughfare which predates the conservation area and runs through its heart, connecting Romford in the west to Brentwood in the east. Frontages generally infill the majority of their plots. Narrow access lanes between buildings lead in from Main Road to rear parking or service yards, whilst several plots have space for parking at the fronts of buildings which detracts from the street scene.

The character area also includes plots to the north and south of Main Road for buildings situated behind the street frontages. These are more irregular in shape and size and do not follow a historic pattern, apart from the plot surrounding Gidea Park Preparatory School at 2 Balgores Lane, a former country house that retains a broad front garden.

#### 5.5.2 Important Views

Views into and out of the conservation area along Main Road to the east and west are key to understanding the relationship between the conservation area and its setting, and the historic importance of this arterial route. Mature trees feature in longerrange vistas in either direction and contribute to the area's edge-of-town character. Views from Main Road through to rear yards and later development are generally of modern spaces of little interest.

Views southward down Balgores Lane and Crossways clearly illustrate the transition in townscape between commercial and residential quarters.

#### 5.5.3 Open Spaces, Trees and Public Realm

The designated open space formed by the Romford Golf Club course is only visible from the northern edge of the character area in glimpses. There are Tree Preservation Orders (TPOs) in place for the grounds to St Michael and All Angels church, which contains some large trees, as well as to plots to the south that include mature foliage; these help to form a green backdrop to Main Road frontages in places. A group of mature trees within the plot of Gidea Park Preparatory School in Balgores Lane are also protected.

The building line to the south side of Main Road sits close to the pavement, limiting space for trees. Some smaller trees are interspersed with planters along the north side of the road east of the intersection with Balgores Lane where pavements are generous. Otherwise greenery is generally limited to planters put out by local businesses.

Area roads are in tarmac with kerbs in concrete and granite kerbs. Pavements are also largely in tarmac with some modern pavers, with some tarmac extending up to building frontages to provide parking. Tall utilitarian streetlamps flank either side of Main Road and continue down Balgores Lane. Street furniture is generally limited to bollards which are found along both sides of Main Road with modern, utilitarian profiles. Some benches are provided in front of St Michael and All Angels church; otherwise no public seating is provided, though some cafés and restaurants put out seating in warmer months. There is no provision for cycle parking.

#### Character Area 4: Main Road Corridor

#### 5.5.4 Building Types and Uses

Main Road serves as the conservation area's principal commercial and retail thoroughfare, and most buildings facing directly onto Main Road, whilst of mixed dates, appear purpose-built for this use. Commercial frontages wrap around along the east side of Balgores Lane. Several buildings have access to service yards or parking to the rear, though this is largely concealed in views in from the street.

Multi-storey buildings are generally in mixed use with ground floors occupied by retail or commercial units or restaurants, with offices or flats above. Some are solely under single use, including 224 Main Road, an 18th century timber-framed building fully in office use, Links House, a mid/late-20th century office block at Nos.109-113A, and The Ship and Archers public cuses. An auto sales and repair centre at Nos.226-232 and a recently redeveloped Co-op building opposite are both modern in Stricks with street-facing car parking.

Other uses within the character area include that of St Michael and All Angels church, consecrated in 1938 to serve the newly-created Parish of Gidea Park; the robust character of the ecclesiastical building is handsome, but set back to the north of Main Road it lacks strong presence within the street scene. This is adjacent to the 1928 Bishop Chadwick Hall, a smaller building previously used as the church, and the c.1933 church hall. A mid/late-20th century building is in use as a Quaker Friends Meeting House between Main Road and Balgores Crescent and is largely concealed from street views; this also houses a preschool. Gidea Lodge to the east of this is a retirement housing complex erected in 1999 within a generous garden, also largely concealed from views in from the conservation area. Gidea Park Preparatory School occupies Balgores House at 2 Balgores Lane, which has been in educational use since 1921.

#### 5.5.5 Scale, Materials and Architectural Details

Main Road comprises a mix of massing, dates and styles, from a pair of two-storey 17th century public houses to late-20th century nondescript office buildings. Building heights are generally of two or three storeys, with some single-storey modern development.

Pitched roofs in tile, robust chimneys and gables lend character to the road's historic buildings. A c. 1912 terrace of shops with flats above at Nos.184-192 at the corner of Balgores Lane makes a strong visual impression in the eastbound approach to the area, followed by the 17th century timber-framed range occupied by The Archers public house. The Ship public house, also of 17th construction, offers a characterful, timber-framed frontage to the north side of the street.

No.75 is a handsome c.1913 building of the 'old English' style which was brought to Gidea Park from White City following the first exhibition and forms the terminus in northward views in from Balgores Lane. The character area includes a modest range of single and two-storey commercial frontages along the east side of Balgores Lane north of Balgores Crescent which retain some historic details and massing. The Gidea Park Preparatory School opposite at 2 Balgores Lane presents a robust and attractive Victorian frontage, rising two storeys in cream and yellow brick over seven bays. Early-20th century ranges also flank Crossways to the east before it continues into the residential neighbourhood to the south.

Modern infill is generally nondescript in style, often in brick but with little detail and no relationship to the surrounding conservation area. The utilitarian commercial frontage to the auto sales and repair centre at Nos.226-232 is particularly incongruous to the context of historic commercial buildings, as is the Co-op building.

A single-storey range of shops at 214-218 appears to have some interesting details, but these are obscured by overlarge fascias and modern shopfronts.



Modern development often does not relate to historic context in Main Road

#### Character Area 4: Main Road Corridor

#### 5.5.6 Shopfronts

There is little consistency across shopfronts within the character area. Some historic shopfronts survive in Main Road; the corner shopfront at the eastern corner of Main Road and Crossways is a particularly attractive example. Others are sympathetic replacements incorporating stall risers, vertical elements, corbelled pilasters and appropriately proportioned shopfront windows.

Other modern shopfronts employ full-height glazing, internally lit signage and overlarge fascias in inappropriate materials which are incongruous to the character of the conservation a. Roller shutters are also a common feature that detract in the character of the conservation area when left closed in daylight hours. Most signage is fixed to frontages; a few sinesses employ tall standalone signage near the pavement which add clutter to the street scene.



Shopfronts along south side of Main Road

#### 5.5.7 Boundary Treatments

Few boundary treatments are legible within this commercial part of the conservation area apart from a few modern, low brick walls and timber fencing which separate building plots from the pavement, usually to enclose front parking areas or restaurant seating. However, there is no consistency in design or materials. Modern brick walls and metal gates mark the entrance to the Gidea Lodge retirement facility along the south side of Main Road. A low brick wall demarcates the front churchyard to St Michael and All Angels church; this appears to be contemporary to the building and neatly frames its garden.

Utilitarian metal guard railings protect the northern corner pavements of Balgores Lane where it meets Main Road. A brick boundary wall with piers and stone coping protects the front and return garden space of Gidea Park Preparatory School in Balgores Lane; this appears to be largely contemporary to the building and adds an attractive historic feature to the street scene.

#### 5.5.8 Audit of Heritage Assets

Two c.17th-century public house buildings are listed at Grade II within the Main Road Corridor: 198-200 Main Road, currently occupied by The Archers, and The Ship public house at 93 Main Road.

Locally listed assets include 75 Main Road, 202-210 Main Road and Gidea Park Preparatory School (Balgores House) at the north end of Balgores Lane.



75 Main Road at north terminus of Balgores Lane



#### Introduction

This section of the Conservation Area Appraisal and Management Plan provides analysis of the current issues and opportunities facing the Gidea Park Conservation Area and reflects the findings of a detailed site survey and internal stakeholder consultation. It will be reviewed and updated following public consultation to ensure holistic coverage.

The issues and opportunities are set out around the below themes:

- **Detracting Buildings and Elements**
- **Boundary Treatments** 6.3
- Page: Maintenance and Repair of Buildings
  - **Shopfronts**

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- Public Realm
- Sustainable Development and Climate Change
- **Development Opportunity**
- **Interpretation and Raising Awareness**
- **Detracting Buildings and Elements**

#### **Detracting Buildings and Elements**

The majority of the conservation area's buildings and townscape are of good quality, and relate to Gidea Park's development as a garden suburb in the early decades of the 20th century. However, there are some instances of detracting elements which present opportunities for enhancement, from whole buildings to smaller-scale alterations or unsympathetic accretions.

#### 6.2.1 Detracting Buildings

There are few instances in which entire buildings or sites detract from the special interest of the conservation area, and these are limited to commercial areas in Main Road and at the south end of Balgores Lane. The buildings are considered opportunities for enhancement largely due to their scale, massing or materiality which is particularly incongruous to area character, as well as their location near entrances into the conservation area.

The utilitarian character of the auto repair and sales shop at 226-232 Main Road visually dominates this end of the commercial corridor due to its size, materiality and particularly overlarge fascia signage. The retail units at 97-101 and 107 Main Road opposite also detract from the conservation area's special interest due to their size and the scale and materiality of their modern frontages, which fail to relate to area character and adjacent listed and historic buildings. These sites also comprise tall, fixed street signage which adds clutter to the street scene, and unsightly street-facing car parks.

The nondescript office blocks at 73 and 109-113A Main Road are of Postwar construction. Their plain, austere facades fail to relate to their setting within the context of historic buildings, while their location adjacent to conservation area boundaries mean they are some of the first visible buildings on the approach into the conservation area.

To the south, the broad massing and utilitarian character of the auto repair and sales shop at 77 Balgores Lane is unsightly and out of context within the neighbouring residential area. A large street-facing car park at a key intersection also detracts from conservation area appearance.

If the opportunity arises to replace or alter these buildings, there is potential to enhance the conservation area by ensuring that proposals are sensitively designed and respond to the area's historic context.

#### 6.2.2 Unsympathetic Additions

There are instances of modern elements added to residential building exteriors across the conservation area that are unsympathetic. These elements, and particularly the cumulative impact of incremental additions, can detract from the appearance of historic elevations and thus conservation area character.

These tend to be less intrusive elements in the case of exhibition buildings, related to surface-mounted services including cables, conduit, security systems and television aerials. These are modern elements alien within a historic streetscape, and therefore cause intrusion. There is opportunity to reduce visual clutter across frontages by removing or rationalising these elements, or by relocating them to more discreet locations. It is recommended that installation of any new external devices or technology be limited to rear elevations so that they remain concealed from the public realm.

Other unsympathetic additions are more common to later houses throughout the conservation area, including the infilling of front porches (though there is evidence of this across the 1934 exhibition houses), the addition of porch canopies, and in fewer cases, the insertion of rooflights which are visible from the street; these elements are generally incongruous to the character of early-20th century and Interwar housing, and should be removed or redesigned when the opportunity arises. New rooflights should be limited to roof pitches which are concealed in views from the public realm, and where rooflights are considered appropriate, they should be conservationstyle rooflights to ensure they are unobtrusive. It is noted that construction of new porches is in part controlled by the Article 4 Direction already in place for the conservation area.

Externally, the installation of artificial grass detracts from the character and appearance of the conservation area as well as not constituting an appropriately permeable surface for landscaping. Likewise large areas of hard-standing both within residential properties and in front of commercial buildings, often used for car parking, greatly detract from the appearance of the conservation area.

#### 6.2.3 Windows and Doors

There is evidence of the unsympathetic replacement of traditional timber and metal windows in historic buildings with uPVC units across the conservation area. This has had a detrimental impact on the appearance of the conservation area, as plastic features are generally incongruous additions to the historic environment, and new profiles are rarely appropriate to the context of historic elevations. Their installation often constitutes loss of original or historic building fabric, which incrementally reduces the special interest of the area. The use of plastic windows (and doors) can also reduce breathability within traditionally constructed buildings by preventing moisture egress, which can cause wider damage to building fabric over time. Changes to historic window opening sizes within elevations that are visible from the street are generally not considered appropriate interventions.

ditional timber doors have also been replaced in inappropriate materials and profiles in places; insensitive diange to principal entrances is particularly conspicuous whin the street scene.

When opportunities arise, returning windows and doors which have been insensitively replaced to their traditional material and appearance is strongly encouraged and would be of benefit to the special interest of the character area. There is also opportunity to update the existing Article 4 Direction to better control changes to windows and doors should the Council wish to do so. It is noted that the process would be undertaken at a future date, separate from the adoption of this CAAMP.

#### 6.2.4 Extensions

Stakeholder consultation has raised concerns over increasing pressures to enlarge the area's historic houses, which often comprise modest original footprints, through extensions, and there is evidence of insensitive extensions appreciable in street views throughout the conservation area. As proposed

extensions are subject to the conservation area's existing Article 4 Direction, there are controls in place to safeguard against insensitive extensions. Sympathetic extensions to houses may be acceptable if they are sited appropriately and out of view from the public realm, are of high quality, complementary design and materials, and of a scale that is appropriate and sensitive, ensuring they do not obscure or otherwise impact legible historic external details or features.

Where insensitive extensions are already in place, there is opportunity to improve their design, proportion and impact on historic fabric when change is proposed.

Garden outbuildings can present alternatives for increased interior space when main house extensions are not feasible. It is important that proposed outbuildings remain concealed in views in from the street and are of sympathetic design and materials to minimise their impact on the appearance of the conservation area. As the legibility of the area's generous plot sizes and layout are important to understanding the special interest of the historic garden suburb, this should also be taken into account when considering the addition of new outbuildings.



Insensitive window replacement, Balgores Crescent



Historic timber door & arrangement, Reed Pond Walk

#### 6.3 Boundary Treatments

Boundary treatments across the conservation area, whilst prevalent, were traditionally modest, and comprised low brick walls, metal or timber pedestrian gates, low timber fencing and hedges. Many of these remain intact, however over time some traditional boundary treatments have been eroded or lost, or unsympathetically replaced, which detracts from the area's historic appearance and from the rhythm of the street scene. There is opportunity to return boundary treatments to their traditional material and appearance in cases where they have been altered or inappropriately replaced, or to reinstate them where they have been lost; this would benefit the special interest of the conservation area.

me front gardens have been partially converted for car king, which detracts from the verdant character of the conservation area. Hard-surfacing for car parking should be to a minimum with gravel finishes are more appropriate that tarmac and soft landscaping retained as much as possible. It is also noted that overlarge or full-height front boundary gates for vehicle access are generally not in keeping with the early-20th century character of the conservation area.

Boundary treatments enclosing open spaces are generally of an appropriate profile and materiality, which allows views through across the spaces.



Mix of low brick walls and hedges in Elm Walk



Hedges demarcating boundaries in Meadway

#### 6.4 Maintenance and Repair of Buildings

The condition of buildings within the conservation area is generally good, however there are a number of buildings which are suffering from a lack of maintenance or are in need of repair. Issues include peeling paint to render, deteriorated render, slipped or moss-covered roof tiles, and peeling paint to timber windows. It is critical that the causes of these issues are resolved to prevent reoccurrence and further damage.

As well as having an impact on physical building fabric, these maintenance and repair issues harm the appearance of both individual buildings and the wider conservation area. There is guidance on good practice maintenance and repair methods in Section 7.0 and further sources of guidance in Further Information and Sources.

### **Shopfronts**

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Retail trade has long played an important role at the heart of the conservation area, and this continues today. Whilst the are some historic shopfronts surviving and others which are designed in a traditional style, some have been unsympathetically altered or replaced over the years. This can be seen in Main Road and Balgores Lane, where it has a detrimental impact on the character and appearance of the conservation area.

Oversized, poorly positioned and internally-lit fascia signs and the use of plastic materials are particular issues. Shopfronts have also had their traditional glazing and stall riser arrangements replaced with large full height windows which have no subdivision, and some employ unsightly, full-width security shutters outside of opening hours. The colour and design of some shop signage does not respect the character of either the building or of the historic townscape as a whole.

When opportunities arise, shopfronts and shop signage should be returned to a more traditional appearance or utilise design features or patterns that are in keeping with historic shopfront design and materiality where appropriate; it is noted that a historic shopfront profile may not be appropriate for a Postwar or modern building. Guidance on shopfront design is included in **Section 7.0**.



Shopfront with historic character at corner of Main Road & Crossways

#### 6.6 Public Realm

Street furniture throughout the conservation area is generally minimal, apart from elements within Raphael Park. A newly improved area of public realm north of the railway at the south end of Balgores Lane has provided new seating and planters, increasing dwell time adjacent to local businesses. There is opportunity to also introduce public seating along the commercial corridor of Main Road to improve the pedestrian experience and increase footfall, whilst an improved scheme for planters could help soften the urban character of the area and the impact of passing traffic. The utilitarian bollards found throughout the conservation area could also be replaced in a more traditional profile, and arranged to avoid unnecessary clutter. The design and materiality of any proposed street furniture should be of high quality and remain sensitive to the character of the conservation area. The introduction of cycle hoops could also encourage environmentally-friendly travel along Main Road and to areas near Gidea Park station (see **Section 6.7.2).** 

No historic paving remains within the conservation are apart from granite kerbs which survive in places. Apart from the recently refreshed area of public realm adjacent to the railway station, existing paving finishes are utilitarian in a mix of tarmac and concrete. There is opportunity to introduce improved, high-quality pavement treatments throughout the conservation area, and rationalise the appearance of patchwork repairs. It is noted that new surfaces would need to complement area character, particularly in residential streets.

Streetlamps have been introduced in several streets in a profile matching the area's previous historic lampposts, and help to demarcate the conservation area from its setting. There is opportunity to also introduce this profile within Main Road, Balgores Lane and Squirrels Heath Avenue, where inappropriately utilitarian lampposts remain. Stakeholder consultation has indicated that a number of replacement lampposts are currently in poor condition or in need of repair; lampposts should undergo regular maintenance and inspection, and repair when needed.

# 6.7 Sustainable Development and Climate Change

The London Borough of Havering intends to be carbon neutral by 2040, and in March 2023 declared a climate and ecological emergency recognising the threats of climate change to the borough. This issue interacts with the conservation area in a number of ways, including changes to buildings and the way people move around the area.

Havering Council have embedded climate change mitigation and minimising carbon emissions throughout the Local Plan, including within its Strategic Objectives and in Policy 12, Healthy communities and Policy 36, Low carbon design and representations.

## 1 Changes to Buildings

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Whilst the maintenance and continued use of historic buildings is thereintly sustainable, there is likely to be both a desire amongst residents and pressure from government over coming decades to improve the energy efficiency and reduce the carbon footprint of Gidea Park's historic building stock. Reducing heating requirements combined with using more sustainable sources of heat and power are the two main aspects to consider.

There are many opportunities to improve the energy efficiency and reduce the carbon footprint of historic buildings which will have no impact on the character and appearance of the conservation area. These include improving the thermal performance of the building stock through insulating lofts and suspended ground floors, draught exclusion and introducing secondary glazing. Historic and traditionally constructed buildings were designed to be breathable, allowing moisture to naturally exit building fabric. Care needs to be taken to make sure buildings of this type remain breathable, rather than air-tight, through choosing appropriate materials as retaining moisture will harm the fabric of the building.

Care also needs to be taken if external changes are proposed, to ensure they remain sensitive to their historic context. This could include the addition of solar photovoltaic panels on south or east/west facing roofs as an additional heating or hot water source. However, these must not detract from the historic character of the building and are likely to be only acceptable when positioned on rear roof slopes not visible from the public realm. Where solar panels would be on a wall or roof slopes facing the public highway, or on a flat roof, planning permission is required.

#### 6.7.2 Changes in the Public Realm

Reducing petrol and diesel car use is critical to reducing carbon emissions and there is government commitment to phasing out their sale over the next decade. Petrol and diesel car use will be replaced by a combination of electric (or other carbon-free) vehicles and active, car less travel. Both will require infrastructure changes that will need to be considered in the context of the conservation area designation to ensure they are implemented appropriately.

Electric vehicles require charging points which can be installed within existing car parks and adjacent to street parking bays. Although these are relatively unobtrusive, they are likely to increase visual street clutter to a degree and should therefore be considered alongside other reductions in street furniture clutter.

Charging electric vehicles in resident parking areas, on the street outside of dwellings, presents a greater challenge with the current technology as personal charging points are expensive and could add considerable additional clutter to the conservation area. However, lamppost charging points and wireless charging may become viable in the future which and are likely to be compatible with a conservation area environment.

Encouraging active travel, cycling, walking and the use of e-scooters is also key to reducing carbon emissions. Reducing vehicle movement in the conservation area will improve air quality and make active travel more pleasant and safer. There is a cycle lane to Main Road; there is opportunity to extend this down Balgores Lane to provide safe access to Gidea Park station. Improved signposting for cycling and walking routes could be introduced whilst taking care not to add to visual clutter through excessive increased signage. There are few cycle stands within the Gidea Park; new additions should be simple Sheffield hoops as these are most sympathetic to the character of the conservation area.

#### 6.7.3 Trees and Open Green Spaces

Maintaining existing trees and replacing lost or dying trees are an important part of the strategy to tackle climate change and trees also contribute considerably to the special interest of the conservation area. Street trees are a particularly important characteristic of the residential garden suburbs such as Gidea Park. These combined with trees in private gardens contribute to the sense of place.

Permission is needed for any works to trees above a certain size in the conservation area (see Section 7.3) and justification is required for the loss of any street trees, which should be also be replaced with new trees. A succession planting strategy would be beneficial to ensure existing tree coverage is maintained into the future and opportunities for new trees should also be considered. There are limited opportunities for new green public spaces within the conservation area, with the greening of existing routes through trees likely to be the most appropriate means of improving green infrastructure. However, there may be opportunities to green some of the car parks along Main Road using carefully-designed planting.

Both of the conservation area's key open spaces – Raphael Park and the Romford Golf Club course – appear to be well maintained and in good condition, and both continue to serve as important features of the conservation area and its setting. The copse at Reed Pond Walk is a designated village green which once had a more open, traditional green character. It has since become densely wooded over time, and, whilst this now contributes to a highly verdant character and likely to ecological habitats within Reed Pond Walk, there is opportunity to explore options for its maintenance, planting and overall character in the future.

#### 6.8 Development Opportunity

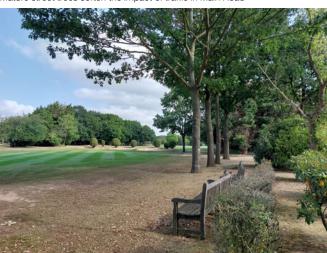
Gidea Park is an affluent and attractive historic garden suburb within greater London, and therefore the area is a desirable place in which to live and work. This means that there is inevitable desire for new development, both within the pservation area and its setting. In addition, the nationwide housing shortage puts local authorities under pressure to permit new residential developments.

New development can present a challenge in historic areas such as Gidea Park, which are adjacent to areas of dense development and where there are few vacant sites and, therefore, limited development opportunity. There are a limited number of sites which have been identified as detracting from the special interest of the conservation area in **Section 6.2**, along Main Road and nearer to Gidea Park station; these have significance enhancement potential through sensitive redevelopment.

Any proposals for new development both within the conservation area and within its setting should be carefully considered and well designed to ensure that the special interest and character of the conservation area are preserved.



Mature street trees soften the impact of traffic in Main Road



Historic open spaces are an integral part of the conservation area's special interest

#### 6.9 Interpretation and Raising Awareness

Thanks to the efforts of the Gidea Park and District Civic Society and local community advocacy there is a good level of appreciation for the historic character of Gidea Park, which is one of the main reasons the suburb is so desirable. In addition to this there are opportunities to increase awareness of the special interest of the conservation area, of the responsibilities and benefits of owning a building in the conservation area and the implications when proposing changes to buildings. There are also opportunities to raise awareness of the importance of building maintenance to prevent degradation amongst local owners and occupiers.



#### 7.1 Introduction

Section 7 provides a framework to guide change within the Gidea Park Conservation Area, based on the understanding of its special interest set out in earlier sections of this document. The overarching ambition for the conservation area is to preserve and enhance what is special about it, and thus this is the statutory duty of the Council. Preserving and enhancing the special interest of the conservation area is achieved by ensuring that change and development take place in a considered and sympathetic way, and by raising awareness of and promoting shared responsibility for looking after the conservation area.

The long-term objectives of conservation area management are to phase out past ill-considered changes and additions, and to ensure that new development is of high quality and ponds to the conservation area's special character. This polies to very small changes, such as reinstating lost historic features, to proposals for new development both within the conservation area and its setting. In addition, the regular real nearest and physical fabric. Repairs can often be necessary; ensuring that these are undertaken sensitively is an important part of looking after historic buildings and the conservation area as a whole.

The following sections set out how and why change within the conservation area is controlled, good practice advice on maintenance and repair and specific guidance on alterations, extension and new development. Specific recommendations can be found in Section 7.8.

#### 7.2 Planning Legislation, Policy and Guidance

Planning legislation, policy and guidance is utilised when determining applications for development or other changes within the conservation area. This is to ensure that proposals seek to preserve or enhance the area's special interest including the contribution made by its setting.

The primary legislation governing conservation areas is the *Planning (Listed Buildings and Conservation Areas) Act* 1990. This sets out statutory duties for local planning authorities in managing change within conservation areas. Regional and local planning policy reflect this legislation in the protection and enhancement of conservation areas. See the London Borough of Havering's website for details regarding current national policy regarding the historic environment and the relevant policies set out within the Havering Local Plan.

In addition to legislative and policy requirements there is a wealth of best practice guidance and advice available from Historic England and other heritage organisations. When changes are being considered to buildings within and in the setting of the conservation area, it is often helpful to first seek pre-application advice from the Council to gain early guidance on proposals and discuss any constraints or opportunities; details for this can be found on the London Borough of Havering's website.

Links and details of all the relevant policy, guidance and advice can be found in **Further Information and Sources**.

### 7.3 Control Measures Brought About by Conservation Area Designation

#### 7.3.1 Restrictions on Permitted Development

In order to protect and enhance the Gidea Park Conservation Area, any changes that take place must preserve, respect or contribute to the character and appearance which makes the conservation area of special interest. Permitted Development Rights, as defined by *The Town and Country Planning (General Permitted Development) (England) Order 2015*, are works which can be undertaken without the need to gain planning permission. Permitted Development Rights are different in a conservation area, meaning that planning permission is needed for works which materially affect the external appearance of a building.

This includes, but is not restricted to:

- The total or substantial demolition of buildings or structures (including walls of over 1 metre in height, gate piers and chimneys);
- Other partial demolition including new openings in external elevations;
- Works to trees with a diameter of 75 mm or greater, measured at 1.5 metres from soil level;
- Changes to the external finish of a building (including rendering, pebble dash or other cladding);
- Changes to the roof shape including installation of new dormer windows and chimneys;
- Any extension other than a single-storey rear extension of 4 metres or less (3 metres or less if the house is detached or semi-detached);

- Extensions to the side of buildings;
- Any two-storey extensions;
- Erection of an outbuilding to the side of a property;
- Aerials and satellite dishes on chimneys or elevations visible from the street:
- Putting up advertisements and other commercial signage (advertising consent may also be required);
- Changing the use of a building (e.g. from residential to commercial); and

Installing solar panels that are wall-mounted on a wall or roof facing the highway.

further information and advice about when planning planission is required within a conservation area, see the lance on the Government's Planning Portal or contact the London Borough of Havering Planning Department. It should be noted that proposals which impact listed buildings, including changes to their setting, may also require listed building consent.

#### 7.3.2 Article 4 Directions

The Council can develop bespoke controls to ensure that specific elements of a conservation area are protected from harmful change. This is done through the application of an Article 4 Direction. These provide additional control by specifically revoking certain permitted development rights, meaning that planning permission needs to be sought before work can be undertaken.

An Article 4(1) direction implemented to control permitted development within the Conservation Area was first adopted in 1986. Five previous Article 4 Directions applicable to the conservation area were replaced by a new Article 4 Direction (Art 4/4/2015) by the London Borough of Havering, confirmed in June 2016. The current Article 4 Direction is applicable to all houses within the conservation area and the Gidea Park railway station. These buildings are divided into two 'Control Levels,' each with their own set of planning controls that relate to external changes to buildings and their plots, including extensions, roof alterations, outbuildings, hard surfacing, boundary treatments, lanes, exterior painting, etc.

Refer to the Article 4 Direction notice available on the London Borough of Havering website for details; a link to this is provided under Further Information and Sources.

#### 7.4 Conservation and the Repair of Buildings

All buildings require maintenance and repair regardless of their age, designation (or lack therefore) or significance. In conservation areas, it is important that such works are carried out sensitively to protect the historic fabric of buildings and preserve the established character of the wider area. The following sections provide a summary of best practice advice on maintenance and repair. Historic England and other heritage bodies, including the Society for the Protection of Ancient Buildings (SPAB), provide a wide range of advice and guidance on how to care for and protect historic places, including advice on the maintenance and repair. See Further Information and Sources for details.

#### 7.4.1 Maintenance

Maintenance is defined as routine work necessary to keep the fabric of a place in good order. It differs from repair in that it is a pre-planned, regular activity intended to reduce the instances where remedial or unforeseen work is needed. Regular maintenance ensures that small problems do not escalate into larger issues, lessening the need for repairs, and is therefore cost effective in the long-term. In general maintenance work does not require consent from the Council, however some maintenance works may require consent.

Regular inspection of building fabric and services will help identify specific maintenance tasks relevant to each building. These could include but are not limited to:

- Regularly clearing gutters and drain grilles of debris, particularly leaves;
- Clearing any blockages in downpipes;
- Sweeping of chimneys;
- Removal of vegetation growth on or abutting a building; and
- Repainting or treating timber windows and other external timberwork.

#### 7.4.2 Repair

Repair is defined as work that is beyond the scope of maintenance, to remedy defects caused by decay, damage or use, including minor adaptation to achieve a sustainable outcome, but not involving alteration or restoration. Identification of repairs may arise during regular inspection of buildings or following extreme weather events and could include repairing damage to roof coverings, repointing of brickwork or repairs to windows.

It is important to understand the cause of any damage or defects both to ensure that the repair is successful and to minimise the work that is required. It is also important to understand the significance of the built fabric affected in order to minimise harm when enacting a repair. As with mentenance, consent may be required for some types of air work; it is advisable to discuss with the Council before work is undertaken.

The following should be considered when planning repair wolks:

- Repairs should always be considered on a case-bycase basis. A method of repair which is suitable for one building may not be suitable for another.
- Only undertaking the minimum intervention required for any given repair.
- Use materials and construction techniques which match the existing fabric to maintain the appearance and character of the building. The exception to this is when existing materials or techniques are detrimental to the built fabric – for example, cement pointing on a historic brick building.

- Repair is always preferable over the wholesale replacement of a historic feature.
- If replacement of a historic feature is required for example, if it has degraded beyond repair the replacement should be carried out on a like-for-like basis using the same materials and construction techniques. The replaced element should be the same as the original in terms of material, dimensions, method of construction and finish (condition notwithstanding) in order to be classed as like-for-like.
- Like-for-like replacement should not be applied in cases where a historic feature has previously been repaired using inappropriate materials or techniques. When seeking to improve failing modern features or past unsuitable repairs, a traditionally-designed alternative using appropriate materials is preferable, such as breathable, lime-based renders and paints. In such cases planning permission, and in the case of a listed building, listed building consent, may be required.
- Repairs should, where possible, be reversible, as better alternatives may become available in the future.
- Repointing should always be carried out using a limebased mortar. Within historic and traditionally constructed buildings, cement-based pointing is damaging to brickwork and stonework as it is an impermeable material. Periodic renewal of pointing will extend the lifetime of building fabric.

#### 7.5 Proposing Change to Buildings

#### 7.5.1 Alteration, Extension and Demolition

The appropriateness of demolition, alteration or extension will be considered on a case-by-case basis, as what is appropriate in one location will not necessarily be acceptable in another. In all cases it is vital to consider the impact of the proposed change on the special interest of the conservation area ensuring that this is preserved or enhanced.

Demolition of buildings that detract from the character and appearance of the conservation area may be beneficial. However, gap sites can also detract from the character of the conservation area, and therefore demolition of whole buildings may only be permitted in instances when rebuilding is proposed, when the site was historically open and this remains appropriate, or when an alternative suitable future use for the site is planned.

Alterations should preserve or enhance the character of the conservation area, and changes should be sensitive to its prevailing architectural and visual character. Alterations may comprise of the removal of detracting features such as uPVC windows, and where appropriate, their replacement with more historically appropriate versions. Alterations should therefore use appropriate materials for their context, and ideally those that are typically found within the conservation area. This may include timber for windows and doors and brickwork for structural elements. New materials may be appropriate as long as they are complementary to the appearance of the area.

Extensions should be subordinate to the existing buildings in their scale, massing and design, and should ensure that any existing historic features remain legible. Extension to the side and front of buildings is unlikely to be appropriate as this would change the visual appearance of the streetscape, whereas extension to the rear is likely to be more acceptable. All extensions should be of high quality design and construction. Whilst the design may use materials and finishes which are characteristic to the conservation area, including local brick, there may be scope for use of a wider, less traditional material palette where these are part of a high quality, sensitively-designed extension that complements or enhances the appearance of the original building.

# Alterations Proposed in Response to Climate Change

There are many opportunities to make changes to historic buildings in the conservation area which will assist in incoroning their thermal performance and, as a result, tackle climate change. Internal works in unlisted buildings will not require planning permission; however, for any works which affect the exterior of a building it will be required. Any works to listed buildings, both internal and external, will require listed building consent and those to the exterior will also require planning permission.

Internally, adding insulation to lofts and below suspended ground floors will improve thermal efficiency, and draft exclusion around windows, doors and vents will also be beneficial. Installing secondary glazing, thick curtains and internal shutters (if appropriate to the period of the property) will also improve thermal performance. Care should be taken to ensure that traditionally constructed buildings remain sufficiently breathable to avoid causing harm to the fabric of the building.

Externally, solar panels could be installed on rear roof slopes not visible from the public realm. Where solar panels are proposed to be installed to listed buildings, even on rear roof slopes, listed building consent will be required. Other renewable energy sources could be considered, such as ground, air or water-sourced heat pumps, so long as they do not detract from the character or appearance of the conservation area.

When planning the installation of electric vehicle charging points (EVCPs) care should be taken when installing any outlets, conduit, etc. in historic building fabric to avoid unnecessary fabric loss and minimise the visual impact of the EVCP in views from the street. EVCPs often require vehicles to be parked at close range; should new hardstanding for parking in a front garden be required, the impact of the potential loss of garden space, soft landscaping and boundary treatments on the character and appearance of the street and wider conservation area should be carefully considered. Whilst the installation of an EVCP does not require planning permission, new areas of hard landscaping are subject to planning permission under the existing Article 4 Directions covering the conservation area.

#### 7.5.3 Modern Additions to Historic Buildings

Proposed modern additions to buildings should be carefully considered to ensure they are both necessary and appropriate to the character and appearance of the conservation area. The removal of unsympathetic features such as redundant external wiring, satellite dishes and television aerials should be undertaken proactively, as this will remove visual clutter and thus enhance the appearance of the conservation area. The installation of new television aerials and satellite dishes on a wall, chimney or roof slope that faces onto and is visible from the conservation area public realm (generally to front and side elevations) requires planning permission and is discouraged. The visibility of such features detracts from the appearance of the conservation area; therefore care should be taken to locate these items discreetly, ideally to the rear of buildings.

#### 7.5.4 Windows, Doors and Drainage Goods

Whilst the majority of buildings in the conservation area contain traditional timber sash or casement windows, there have been instances of replacement with uPVC units. uPVC doors and plastic gutters and drainpipes also found on historic buildings in places throughout the conservation area. Plastic or uPVC elements are not in keeping with the appearance or character of a historic building, and thus detract from the special interest of the conservation area. Therefore, replacement of historic or traditional windows, doors and drainage goods is strongly discouraged unless they are damaged beyond repair. Where such replacement is necessary this should be in traditional and appropriate materials and styles. Where inappropriate replacement has already been undertaken, returning these features back to their traditional appearance is encouraged. The proportions and type of window will be dependant upon the age and style of an individual building.

Timber doors and windows should be painted in appropriate colours. Changes in colour beyond a shade lighter or darker of the existing colours will likely require planning permission, with decisions based on surrounding context and appropriate historic precedent. Drainage goods would have historically been painted cast iron or lead; however other metals may be appropriate subject to their detailed design.

#### 7.5.5 Boundary Treatments

The majority of residential buildings in the conservation area are set back behind front gardens. Loss, alteration and replacement of historic boundary treatments, in particular those demarcating front gardens, has been identified and this has caused harm to the appearance and character of the conservation area. Where historic boundary treatments have been lost or altered, their reintroduction will be encouraged where the proposed materials and design are appropriate to the character of the conservation area. Historically front boundaries would have comprised low brick boundary walls, timber fencing, hedges or other soft landscaping. Other inappropriate existing boundary treatments should be replaced when opportunities arise. Further detrimental alteration and loss of historic and traditional boundary treatments should be discouraged. 20

## 6.6 Shopfronts and Signage

Retail is an important function at the heart of the conservation and appearance of shopfronts is important to the preserving and enhancing its character. Changes to shopfronts will require planning permission, and, if part of a listed building, listed building consent. Changes to signage and advertising will require advertisement consent.

A shopfront is part of a building as a whole, rather than being a separate entity. The design of shopfronts therefore needs to reflect the style, proportions, vertical or horizontal emphasis and detailing of the rest of the building, particularly the principal elevation. This is the case for both buildings which historically contained retail at ground floor and where a shopfront has been a later insertion.

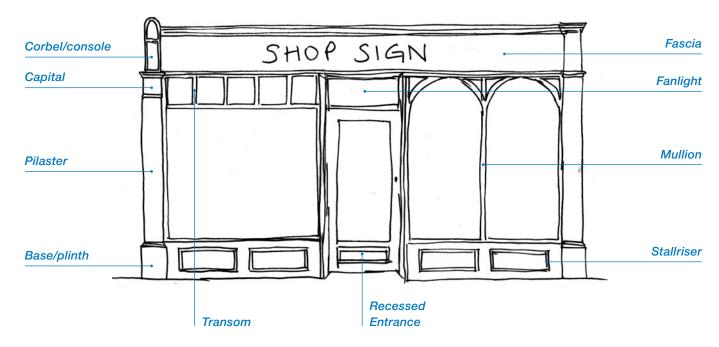
Where historic shopfronts survive or existing shopfronts contribute to the character and appearance of the conservation area, these should be retained and enhanced where possible. Any historic shopfront features which survive should be retained, repaired as necessary, and incorporated into new schemes, rather than being replaced. It would be desirable to reinstate historic features, such as corbels and pilasters where these have been lost and the placement of them, or vestiges of their original design, remain.

Where it is appropriate to replace all or parts of a shopfront, traditional styles and materials are likely to be most appropriate in historic buildings, but nontraditional, sympathetically designed shopfronts would be appropriate in modern and new buildings. The replacement of inappropriate

modern alterations to shopfronts with suitably-designed traditional alternatives is encouraged. The use of plastic and metal is not considered to be appropriate in historic contexts.

Pilasters, corbels, cornices, fascias and stall risers are all important elements in creating the visual proportions of traditional shopfronts. Fascias are of notable importance and should be in proportion to the rest of the shopfront; they should not be overly large or extend above cornice level or beyond the corbels on either side. Full height glazing is a modern feature and does not reflect the character of historic buildings. Smaller windows with stall risers, transoms and mullions are typical traditional features and more appropriate in historic contexts.

#### Components of a Traditional Shopfront



The design and detailing of advertising and signage content, both on fascias, hanging signs and any free-standing signage, are also important in the conservation area. The signage should complement the design of the shopfront and building, conveying a sense of permanence and quality. Colour palettes, lettering style and illumination need to be considered in the design of a complementary shopfront. With regards to illumination, internally lit signage is inappropriate within the conservation area; subtle external lighting is more appropriate. Careful consideration needs to be given to the appropriateness of free-standing signage such as A-boards as these can cause visual clutter and physical impediment to pedestrian movement.

There are examples of fabric canopies within the conservation and such features can add interest to the street spene if of an appropriate design. Canopies should avoid decuring historic features, should be retractable and be reduced of canvas. Canopies would have traditionally been positioned above fascia signage and this is therefore the most appropriate position for replacement or new canopies; projecting hanging signage will allow the shop name and advertising to remain visible when the canopy is down. Installation of canopies will require consent from the Council. Security shutters should comprise open grilles rather than solid, roller shutters.

#### 7.6 New Development

## 7.6.1 New Development within the Conservation Area

Although there are very few empty sites or opportunities for infill there are a small number of detracting buildings, the sensitive replacement or redevelopment of which could enhance the conservation area's appearance. There may also be opportunities to redevelop buildings which make a neutral contribution to the conservation area.

Any new or replacement development needs to take account of, and remain sensitive to, the following:

- The significance of any building proposed for demolition;
- The significance of the relationship between any building to be removed and adjacent structures and spaces;
- The potential to draw inspiration from the historic use and character of a site and the designed uses within a garden suburb (residential and amenity);
- The significance or contribution of any gap site; is it a historic gap within the street frontage or does it detract?;
- The potential impact of proposals on known or potential archaeological remains;
- The potential impact of proposals on the setting of any neighbouring listed buildings;
- The materials and architectural detailing characteristic of the area - these should be a key point of reference in the choice of materials and detailing for proposed new development;
- The scale and grain of the surrounding area, including historic plot boundaries;
- The proposed height of new development in relation to neighbouring buildings and the surrounding context; and
- The potential impact of proposals on important views and the prominence of landmark buildings within the conservation area.

The above list is not exhaustive; each location will present its own unique requirements for sensitive and appropriate proposed development. In all cases, new development must be of high quality design, construction and detailing. The principal aim of new development should be to preserve or enhance the character of its immediate setting and the conservation area as a whole.

## 7.6.2 New Development in the Setting of the Conservation Area

The setting of the conservation area contributes considerably to its special interest. The open space to the east and west and rural setting further afield to the north are particularly important in interpreting this special interest and historic character. New development should remain sensitive to its location within the setting of the conservation area as a designated heritage asset and enhance or preserve, rather than harm, its special interest. Proposed new development should be of the highest quality design and execution in order to preserve and enhance the character of the conservation area and, where relevant, help phase out ill-considered and unsympathetic interventions from the past. The development of tall buildings within the setting of the conservation area would not be considered appropriate to its context as a heritage asset.

#### 7.7 Public Realm

The public realm, namely publicly accessible streets and open spaces, is the area from which the majority of people will experience the conservation area. Preserving and enhancing its character and appearance is therefore of considerable importance for maintaining the special interest of the area. The public realm consists not only of street surfaces, but the street furniture, street signs and interpretation.

A sensitive and holistic approach to change and improvement to the public realm within an overarching strategy is needed, including changes to road infrastructure to encourage cycling and walking. Any additions or amendments to the public realm will also need to take account of highways and other relevant regulations.

Pere are areas where surface finishes are in a poor condition others which could benefit from replacement with more sympathetic and durable surface treatments. Care should be taken to ensure future public realm works are considered for the longer term and materials both for street furniture and surface treatments are durable, are of high quality and are maintained appropriately.

In addition to street furniture, road signage, freestanding shop signage, commercial street advertising (digital panels, billboards etc.), broadband cabinets and items such as inappropriately located café seating can collectively cause excessive clutter within the public realm and detract physically and visually from the pedestrian experience of the conservation area. Applications associated with features within the public realm will be carefully considered to make certain that public streets remain pleasant and attractive places to be whilst ensuring that commercial activities can continue successfully.

With specific regard to lampposts, historically appropriate models appear in the conservation area and where opportunities arise to replace those of less appropriate design this would be desirable.

Installation of vehicle e-charging points are likely to become a feature of the street scene in the near future. Although these are relatively unobtrusive, they are likely to increase visual street clutter to a degree and should therefore be considered alongside other elements of street furniture.

#### 7.8 Specific Recommendations

The following recommendations have been developed in response to the issues and opportunities within the conservation area identified in **Section 6**, and in light of the guidance on managing change provided in Section 7 over previous pages. These recommendations are designed to ensure the preservation and enhancement of the special interest of the Gidea Park Conservation Area.

- O1 The historic environment of Gidea Park, in particular that which contributes to the character and appearance of the conservation area, should be maintained to ensure the town remains a desirable place to live, work and visit.
- O2 Proposals for extension, alteration and new development should preserve or enhance the special interest of the conservation area, or where the public benefits would outweigh any harm.
- O3 The design, construction and materials of any new development, extension, alteration or repair should be of the highest quality and respect their local context.
- O4 Development within the setting of the conservation area should be sympathetic to its special interest in terms of its scale, massing, proportions, materials and detailing.

- 05 Development within the setting of the conservation area should ensure that its green and open character and domestic scale, which contribute to its special interest, is maintained.
- Of Trees and other greening which contribute to the character of the conservation area should be retained, replaced as necessary and succession planting planned.
- O7 Changes to buildings in response to climate change are encouraged but should take into consideration the character and appearance of the conservation area.
- O8 Careful removal of inappropriate and unsympathetic additions to buildings and the street scene is encouraged.
- O9 Reinstatement of lost historic features, such as timber casement windows or corbels on shopfronts within historic frontages is encouraged.
- 10 Replacement of inappropriate modern alterations to shopfronts with suitably designed traditional or sympathetically designed alternatives is encouraged.
- 11 Restoring historic boundary treatments to residential properties where they have been lost or heavily altered is encouraged.
- 12 Proposals for updated or new public realm features should avoid causing clutter, and be carefully designed to remain sensitive to the historic context of the conservation area.
- 13 The condition of the conservation area should be monitored and reviewed periodically.



## **Further Information and Resources**

#### **BIBLIOGRAPHY**

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The Hundred Best Houses. 1911, reprinted 2015 by the Gidea Park and District Civic Society. Available at Havering Library and Local Studies.

#### **Consulted Archives**

Havering Library and Local Studies

Historic England archive

RIBA image library

#### **FURTHER SOURCES OF INFORMATION**

For further study, the following archives hold material that may be of relevance to the history and significance of Gidea Park:

- Havering Library and Local Studies
- London Metropolitan Archives
- Essex Record Office
- RIBA Library
- The National Archives
- Historic England Archive

In addition, the Gidea Park and District Civic Society offer walks, maps and publications about the area's rich history. More information can be found on their website: <a href="https://www.gpadcs.org">www.gpadcs.org</a>

The following book has photographs and further historical detail on the area:

Timothy Brittain-Caitlin, The Edwardians and Their Houses (2020)

London Borough of Havering Interactive Planning
Map (Aurora): https://havering.statmap.co.uk/
map/Aurora.svc/run?script=%5CAurora%20
Cloud%5CAuroraScripts%5CMain%20Aurora%20Web%20
Site%20Scripts.AuroraScript%24&nocache=465d16f4-5f4b-7896-b614-1d1ed855f571&resize=always

#### LEGISLATION, POLICY AND GUIDANCE

Legislation, Planning Policy and Best Practice Guidance

The following legislation, policy documents and guidance have been utilised in undertaking the conservation area review and preparing this report.

- a Planning (Listed Buildings and Conservation Areas) Act 1990
- Ministry of Housing, Communities and Local Government, National Planning Policy Framework (2023) (specifically Section 16: Conserving and Enhancing the Historic Environment)
- London Borough of Havering, Havering Local Plan (2016-2031)
- London Borough of Havering, Havering Character Study (August 2024)
- e London Borough of Havering Archaeological Priority Area Appraisal (May 2024)
- Ministry of Housing, Communities and Local Government, Planning Practice Guidance
- g Historic England, Conservation Area Appraisal,
   Designation and Management: Advice Note 1 (Second Edition, 2019)
- h Historic England, Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment (2008)
- i Historic England, Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Second Edition, 2017)
- Historic England Advice Note 18. Adapting Historic Buildings for Energy Carbon Efficiency (July 2024)

## **Further Information and Resources**

## Planning (Listed Buildings and Conservation Areas) Act 1990

Listed buildings and conservation areas are designated under the Planning (Listed Buildings and Conservation Areas) Act 1990 for their special architectural or historic interest. Designation gives conservation areas protection as alterations, additions or demolitions are controlled by the need for planning permission, which is required by local planning authorities when change is proposed. Section 69 of the Act details the protection of conservation areas and is reproduced below, of specific reference is section (1):

'Section 69 Designation of Conservation Areas

Every local planning authority:

(a) shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, and

- (b) shall designate those areas as Conservation Areas.
- (2) It shall be the duty of a local planning authority from time to time to review the past exercise of functions under this section and to determine whether any parts or any further parts of their area should be designated as Conservation Areas; and, if they so determine, they shall designate those parts accordingly.
- (3) The Secretary of State may from time to time determine that any part of a local planning authority's area which is not for the time being designated as a Conservation Area is an area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance; and, if he so determines, he may designate that part as a Conservation Area.
- (4) The designation of any area as a Conservation Area shall be a local land charge.'

#### National Planning Policy Framework (2023)

The National Planning Policy Framework (NPPF) sets out the government's planning policies for new development within England and how these are expected to be applied. At the heart of the NPPF 'is a presumption in favour of sustainable development'. The most recent version of the NPPF was published in 2023 and of relevance to the current review is Section 16 – 'Conserving and enhancing the historic environment', in particular paragraph 197:

'When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.'

Also of relevance are paragraphs 212 and 213:

'Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 207 or less than substantial harm under paragraph 208, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.'

#### Planning Practice Guidance

In 2014 the government launched the Planning Practice Guidance website (<a href="https://www.gov.uk/government/collections/planning-practice-guidance">https://www.gov.uk/government/collections/planning-practice-guidance</a>). The guidance is a live document intended to provide further detailed information with regard to the implementation of the NPPF. It includes the section 'Historic environment', which advises on enhancing and conserving the historic environment.

#### Conservation Area Designation, Appraisal and Management Historic England Advice Note 1 (Second Edition)

This Historic England advice note, published in 2019, supports the management of change in a way that conserves and enhances the character and appearance of historic areas through conservation area appraisal, designation and management. Of great relevance to the review of Gidea Park Conservation Area are the following paragraphs:

'10 Conservation area designation is undertaken to recognise the historic character of an area and/or in answer to the impact of development, neglect and other threats, on areas which are considered to have special architectural or historic interest. The appraisal is the vehicle for understanding both the significance of an area and the effect of those impacts bearing negatively on its significance. It will form part of the local planning authority's Historic Environment Record and will be part of the evidence base for the local plan and a material consideration in planning decisions.'

## **Further Information and Resources**

'77 Under section 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990 local planning authorities have a statutory duty to draw up and publish proposals for the preservation and enhancement of Conservation Areas in their districts from time to time. Regularly reviewed appraisals, or shorter condition surveys, identifying threats and opportunities can be developed into a management plan that is specific to the area's needs. In turn, this can channel development to conserve the Conservation Area's special qualities. Both areas in relative economic decline and those under pressure for development can benefit from management proposals that promote positive change.'

#### Conservation Principles, Policies and Guidance

Conservation Principles was published by English Heritage (now Historic England) in 2008. It provides a comprehensive mework for the sustainable management of the historic principles wherein 'Conservation is defined as the process of managing change to a significant place in its setting in ways that will best sustain its heritage values, while recognising portunities to reveal or reinforce those values for present and future generations'. The guidance also provides a set of four heritage values, which are used to assess significance. The values are evidential, historical, aesthetic and communal.

#### Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Second Edition)

The significance of a heritage asset is not only derived from its physical presence but also from its setting and the surroundings in which it is experienced. The Setting of Heritage Assets (2nd Edition) published in 2017 by Historic England provides guidance on managing change within the setting of a heritage asset. It recommends the following staged approach to the assessment of proposals during design evolution under Part 2: Setting and Views:

Step 1: Identify which heritage assets and their settings are affected.

Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated.

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it.

Step 4: Explore ways to maximise enhancement and avoid or minimise harm.

Step 5: Make and document the decision and monitor outcomes.

#### **CONTACT DETAILS**

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## **Consultation Statement**

Conservation Area Appraisal and Management Plans for Romford, Rainham, and Gidea Park Conservation Areas

August 2025

#### 1. Consultation activities and details

The consultation on the draft Conservation Area Appraisal and Management Plans (CAAMPs) for Romford, Rainham, and Gidea Park ran for 6 weeks from 28<sup>th</sup> April - 9<sup>th</sup> June 2025. The purpose of the consultation was to gather feedback on the newly drafted CAAMPs; the updated draft appraisals, proposed boundary changes, and updated draft management plans.

A consultation page and questionnaire was hosted on Citizen Space. Responses were also gathered via in-person events and some consultees emailed responses directly to <a href="mailto:developmentplanning@havering.gov.uk">developmentplanning@havering.gov.uk</a>.

Three in-person events were held. One for each CAAMP:

- Rainham: 28th May, Rainham Hall, 2:30-4pm
- Romford: 29<sup>th</sup> May, Town Hall, 10-11:30am
- Gidea Park: 29<sup>th</sup> May, Town Hall, 1:30-3pm

The events were hosted by the Council's Development Planning Team with input from specialist heritage consultants at Purcell. At each the events, there was a presentation about the Conservation Area and the associated draft appraisal and management proposals. This was followed by an open question and answer session enabling attendees to question the council officers and heritage specialists. Physical copies of the documents were provided at each event, alongside large A3 print outs of key maps to help facilitate discussion.

The consultation and associated public events were advertised via social media, the 'Living in Havering' newsletter, and through a <u>press release</u>.

Notification emails were sent out from the Council's development planning team to the planning policy consultation database at the start of the consultation (28<sup>th</sup> April 2025) and a reminder email was sent on the 30<sup>th</sup> May 2025. A notification email was also sent on 6<sup>th</sup> May 2025 to all Havering Councillors about the consultation.

The comments that were made over the consultation period, and how they have been incorporated into the final documents, are summarised in section 2 below.

#### 2. Response to the consultation

The Council received 21 responses to the consultation. Plus, informal comments gathered at the events.

This included 4 statutory bodies:

- National Highways
- Environment Agency
- Historic England
- Natural England

"All three draft appraisals are comprehensive, clear, and well researched, providing well presented guidance and justification for the proposed boundary changes and recommendations."

Historic England

All statutory bodies were supportive of the plan, or had no comment. No changes were requested by the statutory bodies, apart from adding a reference to a Historic England advice note 18, which was actioned and reflected in the final CAAMP.

#### 2.1 Romford

Changes made to the Romford CAAMP include, but aren't limited to:

- Further wording added to the 'Special Interest' section (Section 2): "The
  arrival of the railway at the beginning of the Victorian period served as the
  stimulus for this growth and prosperity. The importance of the railway
  continued into the 20th century, especially the inter-war and post-war periods,
  which saw Romford increasingly becoming the social and commercial centre
  of the wider area."
- Added the railway station as an important view in map on page 28
- Added in railway arches in Section 4.7
- Additional Specific Recommendation added to section 6.8: 'Enhancement of the public realm is encouraged including appropriate surface treatments and with potential for integration with heritage interpretation.'

Many comments were made about the boundary changes proposed for Romford CA. Overall, responses were very positive about the expansion to the boundary proposed, with most comments suggesting further expansion of the boundary. Only one commenter suggested a reduced boundary.

The Council and our heritage experts (Purcell) considered these comments thoroughly. A carefully nuanced approach has been undertaken to propose changes to the boundary which balances the best practice approach of not just including facades in a conservation area boundary, whilst not including extensive areas of building which do not contribute to the Conservation Area. The boundary of a Conservation Area should not be used to protect any asset of heritage value but instead be focused on the special interest of a Conservation Area. It is not desirable to extend a conservation area boundary too far as this dilutes the special interest of the area protected. Historic England's response confirmed they are entirely supportive of the proposed boundary changes and consider that they align with their best practice guidance. Historic England had no comments to make on the proposed boundary.

Ultimately, the boundary remains unchanged from the proposed consultation boundary. The Council's response to specific suggestions to include or exclude in the Romford CA boundary are laid out below.

Comments suggesting further buildings/areas to be included in the boundary:

Include / Exclude	Building or Street	Council Response
Include	The Rogern Reede Almshouses	This building is modern and of no heritage interest.
Include	St. Edward the Confessor RC Church	The Church is statutorily listed Grade II and therefore has considerable projection in its own right. It is therefore not considered necessary or appropriate to extend the conservation area across the ring road to include.
Include	Kingston Road, Erroll Road and Gilbert Road	These roads are not near or adjacent to the CA and therefore do not add to the special interest of Romford.
Include	Como street	These roads are not near or adjacent to the CA and therefore do not add to the special interest of Romford.
Include	The Boundary should include both sides of South Street (including the Havanna Cinema)	Buildings on the west side of South Street are all post war and would dilute the designation if included. The cinema has been substantially altered through redevelopment and it is not considered appropriate to include. It was also recently removed from the local list for the same reason.
Include	Raphael Parks and Blacks Bridge	These are in the Gidea Park CA already.
Include	Junction of Victoria Road and South Street	The other buildings on this side of South Street are all post war and would dilute the designation if included. Also many are on the local heritage list, so already have protection.
Include	Old mill parade	There is insufficient justification to include this building / area in the conservation area boundary
Exclude	<ul> <li>South of Market Place between Nos. 30–96</li> <li>Entrance to the Liberty Shopping Centre on South Street</li> <li>North of Market Place and High Street</li> <li>Parts of the South Street extension</li> </ul>	This commenter suggested that the CA boundary should be kept as it is, largely focusing on frontages rather than expanding the CA to include the whole buildings behind the frontages. Safeguarding only frontages of buildings is no longer a supported approach by Historic England. Guidance has changed since the Romford CA was designated, and previous reviews published. Historic England supports the proposed expansion of the Romford CA boundary to include whole buildings.

Other comments made were not relevant to the scope of the CAAMP, but have been noted by the Council:

- Many comments on suggested changes to the Market Place, including the financing behind the rejuvenation of the market, and the coordinated approach that will be needed between the Council, Romford BID, Local Businesses, and the Romford CAAMP (heritage aspect)
- Suggestion to introduce an Article 4 direction for Romford CA
- Comments about the maintenance of the Town centre (cleanliness, CCTV, antisocial behaviour)
- Suggestion of a Conservation Area advice service available to Town Centre property owners
- Suggestion for Romford CA to have an action plan with targets and funding attached

"Romford Civic Society is very supportive of the new Conservation Area Appraisal and Management Plan for Romford Conservation Area. We particularly welcome the proposed the expansion of the conservation area as per the 2008 recommendations, with a reasoned justification for what is proposed."

Romford Civic Society

#### 2.2. Rainham

Very minor changes to the Rainham document took place, mainly updating the issues section. There were 5 responses in citizen space about the Rainham CAAMP, plus the comments considered at the in-person event.

Comments were generally supportive of the boundary proposed, and protection of the Rainham Conservation Area. There was one suggestion to extend the boundary further to include buildings such as Rainham village primary school, the Albion, old police station building, and the bridge on bridge road. After careful consideration with our consultants, it was decided to not extend the boundary further as the buildings suggested are far removed from the historic village core of Rainham. There is too much intervening suburban expansion to warrant extending the boundary and it was noted that these elements are unlikely to be of sufficient interest for inclusion due to their more recent date and lack of strong physical connection to the village core.

Other comments made were not relevant to the scope of the CAAMP, but have been noted by the Council, such as

- Maintenance issues: graffiti in the area, clock on the war memorial broken, planter maintenance, more bins needed
- Infrastructure needed to support new communities in the area

- Support for more greening
- Suggestions for buildings to be locally listed

There were also comments about topics such as buildings in the setting of the CA needing to be sympathetic, fittings reflecting the historic character of Rainham, need for sympathetic signage on retail units, etc. These are already covered in the Rainham CAAMP.

#### 2.3 Gidea Park

There were 7 responses in citizen space about the Gidea Park CAAMP, plus the comments considered at the in-person event, and a formal response from the Gidea Park Civic Society.

Changes made to the Gidea Park CAAMP include, but aren't limited to:

- Clarified wording around EV charge points
- Updated wording on solar panels
- Recommendation 6 strengthened to include other greening and succession planting planning
- Changed the wording in section 6.2.3 to reflect that reinstatement of original windows is 'strongly encouraged'
- Added opposition to artificial grass in section 6.2.2
- Small grammatical / spelling edits
- Additions to the bibliography

Comments were very positive about the need to protect and conserve the historical area of Gidea Park. Comments were supportive of the boundary proposed; the Gidea Park Civic Society agreed with the proposed boundary. There were some suggestions for further expansion of the boundary but the Council is conscious to keep this boundary aligned with the original planned garden suburb and areas that have surviving model houses. This strictness of the boundary ensures the special character is kept and cannot be contested.

Other comments made were not relevant to the scope of the CAAMP, but have been noted by the Council, such as

- Suggestion to do a more general greening strategy
- Suggestion to re-visit/update the article 4 direction some planning controls suggested sit outside the scope of a CAAMP
- Wanting to encourage more active travel in the area
- Comments on lack of funding affecting heritage, planning enforcement, etc.

"The opportunities for improvement are sound"

Resident

"it is so important to preserve this area"

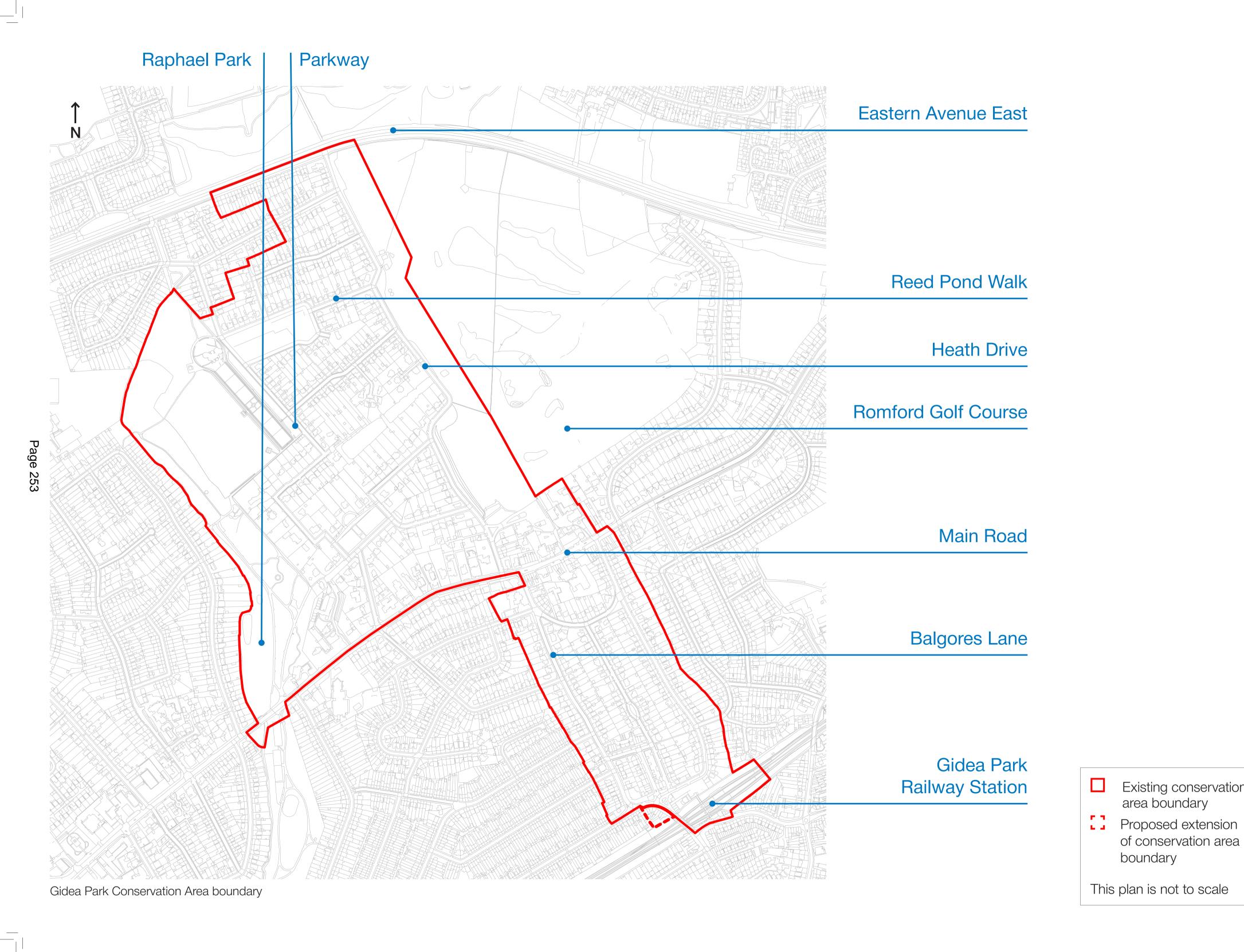
Resident

"We fully support the positive approach adopted throughout Page 250 conserve this historical this very comprehensive review and update"

"I agree with need to protect area of Gidea Park"

Resident

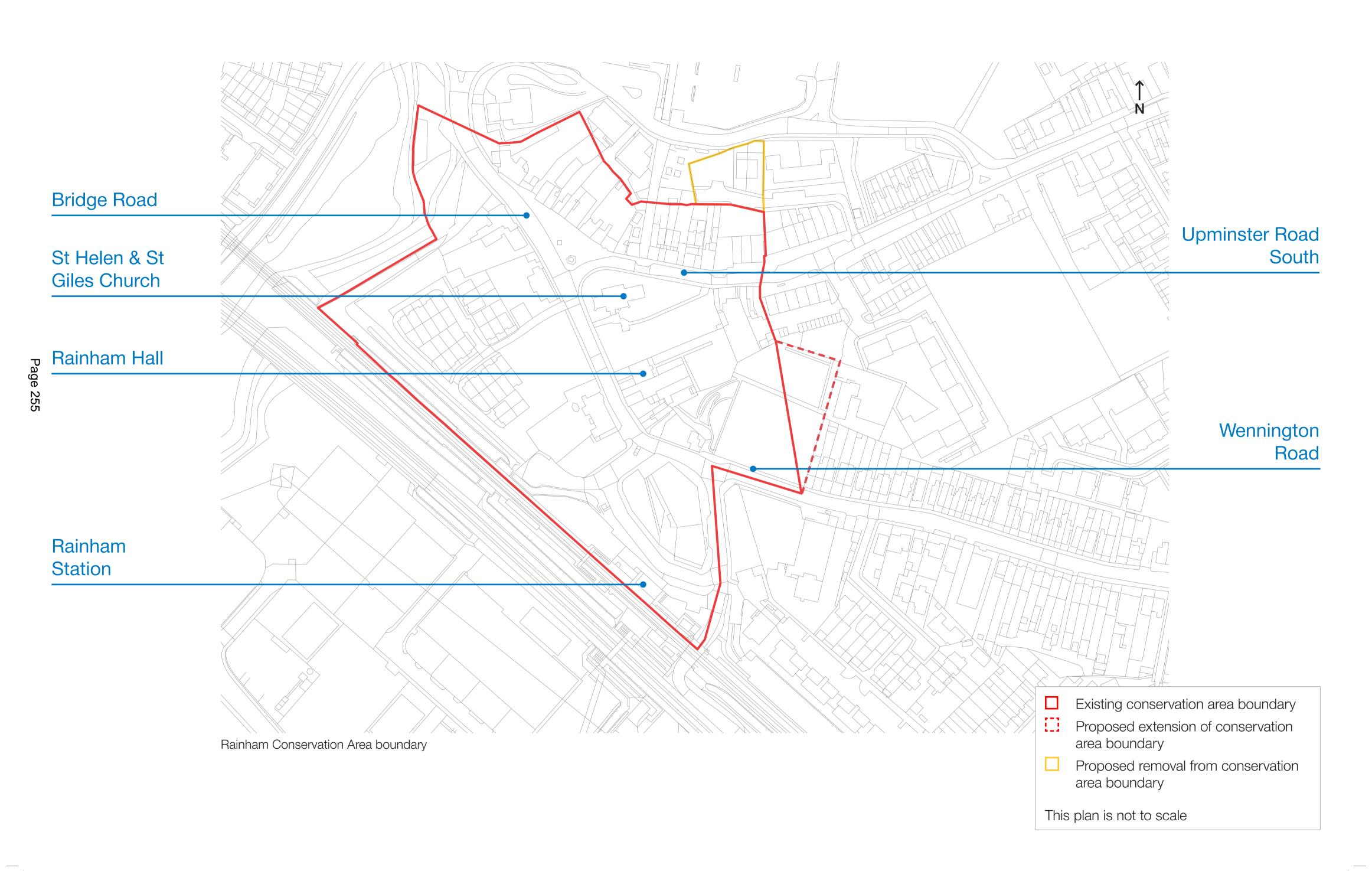




Existing conservation area boundary

of conservation area

boundary



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Subject Heading: Housing Ombudsman Annual Report

Cabinet Member: Councillor Paul McGeary

ELT Lead: Neil Stubbings

Report Author and contact details: Sarah Birtles

sarah.birtles@havering.gov.uk

01708 434 092

Policy context:

The Housing Ombudsman Annual Report is

a compliance requirement in line with the Housing Ombudsman code of compliance for complaints handling. This is also in line with the Corporate Complaints Policy.

with the corporate complaints rolley.

Financial summary: The Ombudsman has statutory powers to

monitor and enforce compliance. Non-compliance could trigger intervention from

the Regulator of Social Housing,

potentially affecting, access to funding and

penalties for non-compliance.

Is this a Key Decision?

When should this matter be reviewed? Annually, or following significant change to

service or a restructure.

Reviewing OSC: Places OSC

The subject matter of this report deals with the following Council Objectives

People - Supporting our residents to stay safe and well Place - A great place to live, work and enjoy Resources - Enabling a resident-focused and resilient Council

### SUMMARY

The report is a requirement of the self-assessment against the Housing Ombudsman Complaints Handling code. The code has to be reviewed annually and a self-assessment completed by Social Housing Landlords to ensure they are complying with the code. Part of the self-assessment is to complete an annual report.

# RECOMMENDATIONS

Cabinet is recommended to agree the report and to publish along with the self assessment on the Council website no later than the 30 September 2025.

## REPORT DETAIL

This report contains information regarding Stage One, Stage Two and Housing Ombudsman complaints received for Housing Services under the Housing Revenue Account for the financial year 2024-2025.

The report shows volumes, top ten themes, performance, declined complaints and service improvement. The report also includes our feedback on the Housing Ombudsman Complaints Handling Performance report and spotlight reports.

# **REASONS AND OPTIONS**

# Reasons for the decision:

For Scrutiny and Review of the report. Feedback on report required and report to be published no later than the 30 September 2025.

Already agreed by Strategic Director of Places, Director of Housing and Property, Leader of the Council and the Cabinet Member for Housing and Property.

# Other options considered:

None

**IMPLICATIONS AND RISKS** 

# Financial implications and risks:

There are no direct financial implications from publishing the self-assessment report. Failure to comply with the contents of the code could result in financial penalties being awarded against the authority as the Landlord of the Housing Revenue Account.

<u>Compensation Orders:</u> The Ombudsman can order landlords to pay compensation to residents. In 2023–24, over £4.9 million in compensation was ordered or recommended, a significant increase from the previous year.

<u>Non-compliance:</u> Leads to higher compensation awards due to findings of maladministration or service failure.

Complaint Handling Failure Orders (CHFOs): If a landlord fails to comply with the Code or does not complete the required annual self-assessment, the Ombudsman may issue a CHFO. These orders can lead to:

- Mandatory corrective actions.
- Increased scrutiny and oversight.
- Potential reputational damage that may affect funding or partnerships
- Operational Costs: Poor complaint handling leads to escalated cases, which are more resource-intensive. The Ombudsman reported a 60% increase in formal investigations, with each case generating multiple orders and recommendations

# Legal implications and risks:

# Statutory Duty to Comply

The Code is now a legal requirement for all members of the Housing Ombudsman Scheme. Landlords must submit an annual self-assessment and demonstrate compliance in policy, practice, and governance oversight

# **Human Resources implications and risks:**

### Staff Accountability and Performance

Failure to comply with the Code may expose gaps in staff training, supervision, and complaint-handling competence. Staff may be held accountable for poor decision-making or delays, especially if complaints escalate to formal investigations or legal action.

# Training and Development Gaps

The Code requires staff to be trained in fair, transparent, and timely complaint resolution. Non-compliance highlights deficiencies in professional development and may necessitate urgent remedial training, increasing HR workload

# Workforce Morale and Retention

Poor complaint handling can lead to increased stress and burnout among frontline staff, especially if they face resident frustration or media scrutiny. High turnover may result if staff feel unsupported or blamed for systemic failures

## Cabinet, 17 September 2025

# Recruitment Challenges

Reputational damage from non-compliance may deter skilled professionals from joining the organisation. HR may struggle to attract candidates to roles perceived as high-risk or poorly managed.

# Equalities implications and risks:

# Breach of Equality Duties

Landlords must give due regard to the needs of residents with protected characteristics (e.g. disability, race, age, gender, religion). Non-compliance with the Code may result in indirect discrimination, especially if complaint processes are inaccessible or inconsistently applied

# Failure to Make Reasonable Adjustments

The Code requires landlords to adapt complaint procedures to meet individual needs (e.g. providing information in alternative formats, offering support for neurodiversity or disabled residents). Ignoring these duties may breach the Equality Act 2010, exposing the organisation to legal claims

# <u>Disproportionate Impact on Vulnerable Groups</u>

An Equality Impact Assessment (EqIA) conducted by the Ombudsman found that poor complaint handling disproportionately affects ethnic minorities, disabled residents, and digitally excluded individuals. 20% of respondents to the Code consultation were from ethnic minority backgrounds, and many highlighted the importance of fairness and transparency in complaint handling

# Health and Wellbeing implications and Risks

Under the Health and Social Care Act 2012 the Council is responsible for improving and protecting the health and wellbeing of local residents. Havering Council is committed to improving the health and wellbeing of all residents.

# Physical Health Risks

Poor complaint handling can delay resolution of issues like damp, mould, heating failures, or unsafe structures. These conditions are linked to respiratory illnesses, cardiovascular problems, injuries, and infectious diseases such as influenza and tuberculosis.

# Mental Health Impact

Unresolved complaints and lack of responsiveness can cause stress, anxiety, and feelings of helplessness among residents. Vulnerable groups, including older adults and those with disabilities, are particularly at risk of mental health deterioration when housing issues persist

# Safeguarding Failures

## Cabinet, 17 September 2025

The Code explicitly states that complaints involving safeguarding and health and safety must not be excluded. Non-compliance may result in missed opportunities to protect residents from harm, especially in cases involving domestic abuse, neglect, or unsafe environments.

# Barriers to Accessing Support

If complaint processes are not accessible (e.g. for neurodiversity residents or those with language barriers), individuals may be unable to raise concerns that affect their wellbeing

# **BACKGROUND PAPERS**

This is based on the compliance requirements against the Housing Ombudsman Complaints handling code published in April 2024

The Complaint Handling Code | Housing Ombudsman Service

This report relates specifically to:

- 8.1 Landlords must produce an Annual Complaints Performance and Service Improvement report for scrutiny and challenge, which must include:
- a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements
- b. a qualitative and quantitative analysis of the landlord's complaint handling performance this must also include a summary of the types of complaints the landlord has refused to accept
- c. any findings of non-compliance with this Code by the Ombudsman
- d. the service improvements made as a result of the learning from complaints
- e. any annual report about the landlord's performance from the Ombudsman
- f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord

### And

8.2 - The Annual Complaints Performance and Service Improvement report must be reported to the landlord's governing body (or equivalent) and published on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.





# INTRODUCTION

### A Year of Progress and Positive Change

Following a demanding and transformative year in 2023/2024, Havering Council has made significant strides toward service improvement in line with the Housing Ombudsman's standards. While there are still areas for development—as highlighted in the 2023/2024 Landlord Report and subsequent case outcomes—this year's report outlines the key improvements we've made and our continued commitment to service excellence.

### **Restructuring and Policy Enhancements**

In 2024/2025, post the centralisation reorganisation, the Complaints Service for Havering Council is better aligned with the Ombudsman's expectations. The structural changes introduced in 2023/2024 have been implemented and have increased performance, with the team now meeting performance targets more consistently. We undertook a comprehensive review of our complaints policies and processes that will see the new Complaints Policy and Procedure published by the 30<sup>th</sup> September 2025.

### **Service Improvements and Outcomes**

Due to the refined structure and dedicated complaint-handling officers, we've seen a marked increase in timely responses and a reduction in the number of Stage 2 complaints. Our handling of Ombudsman investigations and orders has also improved. As part of the planned improvement across the services, as of this financial year 2025/2026 service improvement officers are now conducting regular case audits and analysing outcomes from Housing Ombudsman decisions to identify learning opportunities and drive continuous improvement. The Complaints service and Housing service has worked together to design a "deep dive" review of the customer end to end experience of the whole complaints handling process. This has identified improvements already and will further strengthened performance when undertaken.

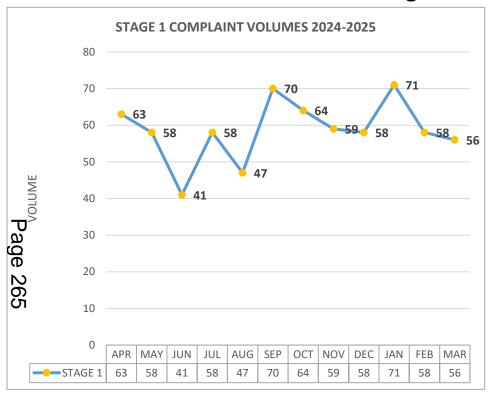
# **Report Highlights**

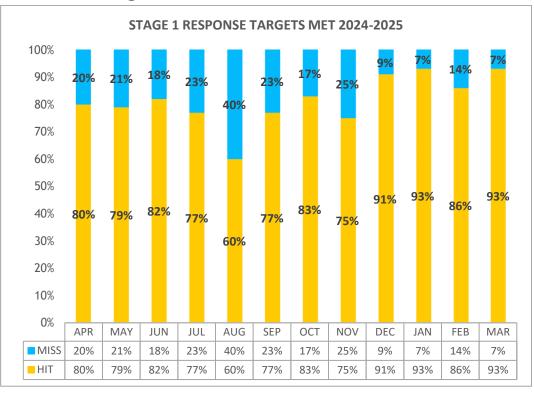
This year's report provides a detailed overview of:

- · Complaint volumes and response times
- Common themes and trends
- Service improvements achieved
- Planned next steps for 2025/2026

Havering Council currently manages 9364 properties and 8778 tenants and completed 31,918 responsive repairs during 2024-2025. We remain committed to continuous improvement and to ensuring that our complaint-handling processes are efficient, transparent, and responsive to residents' needs.

# Stage 1 -Volumes & Targets

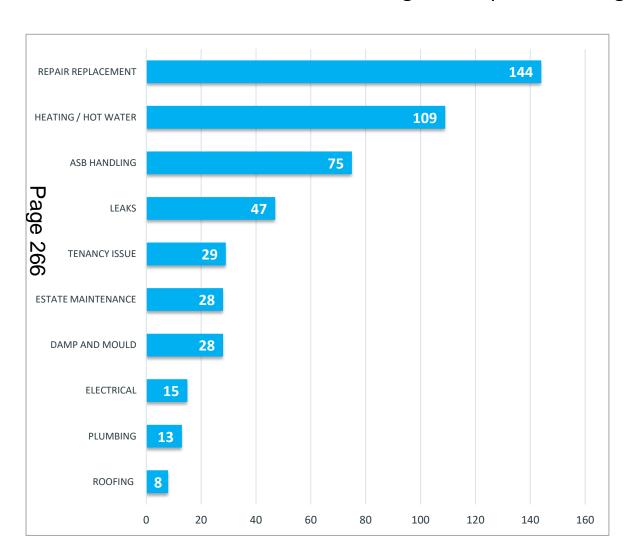




Stage 1 complaints have shown a notable 31% decrease in volume compared to the previous year (2023–2024), reflecting a positive trend in early resolution and service delivery. While there were identifiable peaks in July, September, and January, monthly complaint volumes remained below 71 cases throughout the year. The average number of complaints per month was 59.

In addition to the reduction in volume, response times have improved significantly. Despite some being impacted by resourcing challenges, e.g. attracting suitably experienced staff in a competitive market, the remaining months consistently met or exceeded the 80% target, with several months achieving over 90% compliance. This demonstrates a strong overall performance in complaint handling and a continued commitment to timely responses.

# Stage 1 – Top Ten Leading Themes



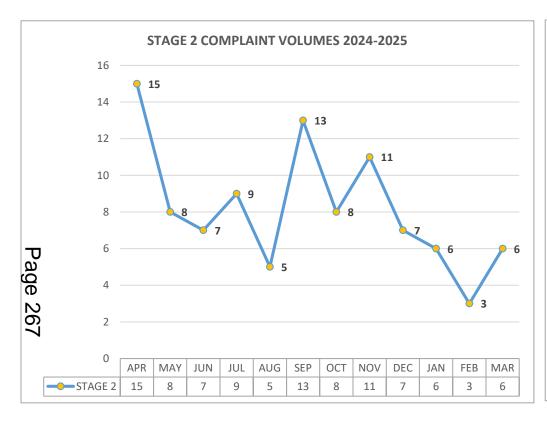
The chart opposite presents the ten most common themes among complaints in the Social Housing sector for the 2024–2025 reporting period.

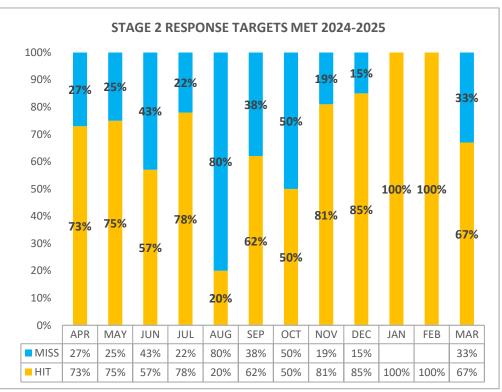
As in previous years, Repair Replacement remains the most frequently upheld issue, followed by complaints related to Heating and Hot Water. In efforts to reduce these, the Complaints and Housing services has worked together to design a "deep dive" review of the customer end to end experience of the whole complaints handling process and is already identifying improvements.

It is also notable that Anti-Social Behaviour involving Housing Tenants is now recorded under the broader Housing category, accounting for 10% of all Stage 1 complaints.

Please note that of the 703 Stage 1 complaints received during this period, the chart reflects 497 cases. These represent the top ten complaint themes only and do not include cases where the theme fell outside the top ten categories.

# Stage 2 – Volumes & Targets





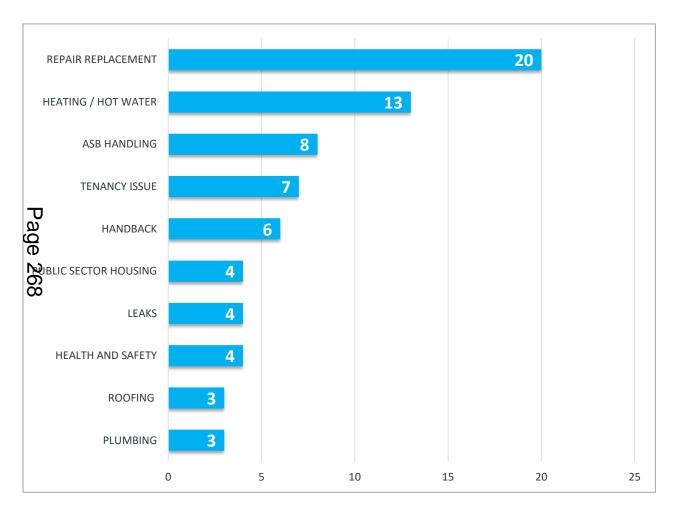
Stage 2 complaints have shown a modest decrease compared to 2023–2024, with 8% fewer cases being escalated to this stage.

There were slight increases in volumes in July, September, and November, but the overall trend throughout the year indicates a gradual decline in Stage 2. complaint volumes.

Performance against response targets has also improved significantly. In seven months of the year, services achieved a success rate between 70% and 100%, marking a substantial improvement on 2023–2024, when six months recorded a 0% success rate for Stage 2 responses.

While there were some dips in performance during months affected by resourcing challenges, the overall trajectory reflects stronger service delivery and more timely complaint handling.

# Stage 2 – Top ten Leading Themes

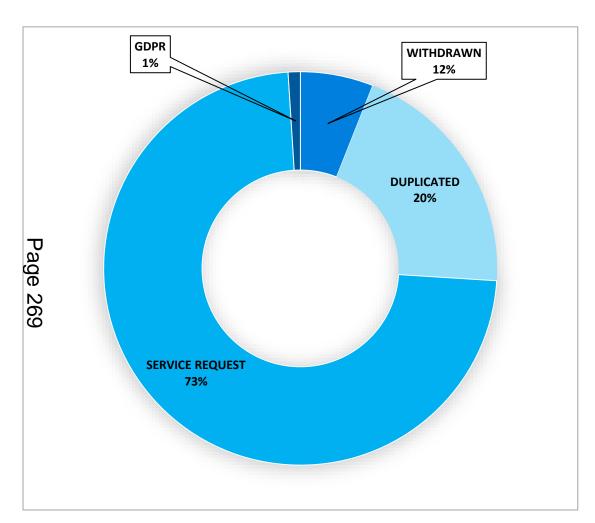


The chart opposite illustrates the ten most common themes for complaints escalated to Stage 2 within the Social Housing sector during the 2024–2025 reporting period.

As with Stage 1, Repair and Replacement remains the leading cause of complaints, followed by issues related to Heating and Hot Water and Anti-Social Behaviour.

Of the 98 Stage 2 complaints received during this period, the chart reflects 72 cases. These represent only the top ten complaint themes and do not include cases that fell outside these categories.

# **COMPLAINTS HANDLING & PERFORMANCE Declined Complaints**



The chart opposite shows that 185 complaints relating to Housing were declined during the 2024–2025 reporting period.

The majority of these were declined on the basis that they did not meet the definition of a complaint under the Complaints Policy.

# Specifically:

73% were identified as Service Requests and were redirected to the appropriate service area. In efforts to reduce this percentage, we have rolled out a training programme for all Councillors and provided a definition of what a service request is.

20% were duplicate complaints.

6% were withdrawn by customers.

1% related to GDPR concerns, where consent was required but not received.

This breakdown helps to ensure transparency in how complaints are assessed and managed, and highlights the importance of accurate categorisation at the point of receipt.

# COMPLAINTS HANDLING & PERFORMANCE Service Improvements Achieved

# **Updated Complaints Policy and Procedure**

Havering Council has completed a review of its Complaints Policy and Procedure (2023). The revised policy is scheduled for publication by the end of September 2025, reinforcing our commitment to transparency, fairness, and continuous improvement in complaint handling.

# **Ombudsman Code of Compliance**

As part of our alignment with the Housing Ombudsman's Code, the Goodwill Gesture Policy has been temporarily withdrawn to allow for a comprehensive review, to address inconsistencies with other Havering policies and ensure a consistent, fair approach.

In the interim, the Complaints Policy clearly states: "We look at the injustice that has occurred and then use the Housing Ombudsman to objectively decide what an appropriate remedy for that injustice is."

To further align with the Ombudsman's Code, Havering is removing the term "vexatious" from all relevant Housing and Complaints policies. It will be replaced with "unacceptable behaviour", promoting a more constructive and inclusive approach to managing challenging interactions.

# **Enhanced Data and Insight Capabilities**

The Complaints Service Improvement Team is now leveraging advanced reporting tools, including our complaints management system and Power BI, to collect and analyse and communicate a broader range of data. These enhanced capabilities enable us to identify emerging trends, monitor performance effectively and drive meaningful improvements in service delivery.

# COMPLAINTS HANDLING & PERFORMANCE Service Improvements Achieved

# **Resident Feedback and Engagement**

To strengthen our commitment to resident voice, we are introducing a feedback survey for customers following the resolution of their complaint. The survey will be quick and easy to complete, include multiple-choice question and gather insight to inform service improvements and highlight areas of success.

# Deep Dive into Complaints Handling

second half of the 2025–2026 year. This initiative brings together a dedicated team of professionals and senior managers to assess:

• Current practices
• Identify areas for improvement. As part of our continuous improvement efforts, Havering Council is undertaking a Deep Dive review into the handling of Social Housing complaints during the

- Ensure the highest standards of service for our residents
- Learning from Complaints to Drive Service Improvement
- Improve feedback and communication for residents

Feedback from this working group will also be fed into the Complaints Board being set up for 2025/2026, with a clear set of agreed actions and ongoing reviews to support long-term improvements in how we manage and respond to complaints.

Havering Council is committed to using complaints as a valuable source of insight to inform and implement meaningful service improvements. By analysing complaint trends, identifying root causes, and listening to resident feedback, we aim to ensure that every complaint contributes to better outcomes and a more responsive, resident-focused service.

# Housing Ombudsman Landlord Annual Report - 2023/2024

### **Housing Ombudsman Landlord Report for 2023-2024**

The Housing Ombudsman's Landlord Report for 2023–2024 found that Havering Council had a maladministration rate of 78%, slightly above the national average of 73%.

This reporting year marked a significant period of transition for Havering Council, as all complaints handling functions were brought together into a single, centralised service in December 2023. Despite the scale of this change, early signs of improvement is already evident.

The report also noted that Havering Council is broadly comparable to other local authorities with similar volumes of housing stock. When benchmarked against councils of a similar size and type. Havering's maladministration rate was 6% lower for service failure cases and 3% lower for no maladministration findings

# **©** Compliance and Financial Remedies

Mavering Council achieved a 100% compliance rate with the Ombudsman's recommendations and orders within the required three-month timeframe. A Notal of £5,815 was paid in remedy payments during the year. Full details can be found in the published report: Landlord-Report-Havering-Council (1).pdf

# **Havering Council's Findings and Actions**

As part of our commitment to transparency and continuous improvement, Havering Council has reviewed its complaints performance for the 2023–2024 financial year. While our performance is broadly in line with similar organisations, we remain focused on:

- Reducing complaint volumes
- Improving outcomes for residents

# Key actions taken include:

- Identifying areas where targeted training is needed to enhance service delivery
- Introducing new data points into our reporting systems to improve performance tracking and early issue detection

Since the start of 2025, we have already seen notable improvements in response times and complaint resolution. We are committed to maintaining this momentum and continuing to deliver a more responsive, resident-focused service.

# **Relevant Reports**

# **Using Insight to Drive Improvement**

With the Housing Complaints Service restructure now stabilised and staffing levels approaching full capacity, Havering Council is reinforcing its commitment to learning and continuous improvement. As part of the Councils 2025/26 Corporate Plan Theme of Enabling a resident-focussed and resilient Council, with the explicit aim to provide excellent customer service and engage effectively with our communities. The Council has committed to improve customer satisfaction levels by modernising the way we work. This includes an explicit commitment to increase the number of complaints responded to on time, escalated to Stage Two and Ombudsman enquiries and learning from complaints received by the council.

# **Training and Development**

Training for the Housing Complaints Team is underway, with a programme planned for the second half of 2025/2026 focusing on:

• Service-specific knowledge

- Skills to manage and resolve complaints effectively
- Enhanced understanding of the Housing Ombudsman's Code for Complaint Handling

# Housing Ombudsman Spotlight Reports scheduled for review include:

- Learning from Severe Maladministration Reports
- **Repairing Trust**
- Repairs and Maintenance
- Attitudes, Respect and Rights

By reflecting on the findings and recommendations within these reports, we aim to embed best practices across our services and ensure our approach to complaint handling is fair, empathetic, and effective.

# **Insight, Investigations and Information Team**

The Insight, Investigations and Information Team continues to play a key role in driving service improvement. Over the past financial year, the team has implemented a range of changes and remains focused on further enhancing the service throughout the current year.

Page

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# **CABINET**

**Subject Heading:** 

**Cabinet Member:** 

**ELT Lead:** 

Report Author and contact details:

Policy context:

**Financial summary:** 

Is this a Key Decision?

When should this matter be reviewed?

**Reviewing OSC:** 

# **Complaint Policy**

Councillor Ray Morgan

Mark Ansell

Sarah Birtles <u>sarah.birtles@havering.gov.uk</u> 01708 434 092

The Complaints Policy from July 2023 has been reviewed to ensure it is fully in line with the Housing Ombudsman (HO) Complaints Handling Code 2024. Local Government Social Care Ombudsman (LGSCO) complaints code due to be implemented in April 2026 and the LGSCO Children's statutory Guidance 2023.

Proactive alignment with all three frameworks reduces exposure to financial penalties, legal claims, and reputational damage. Investment in training, policy review, and governance oversight is more cost-effective than reactive remediation. Transparent and accessible complaint handling supports resident wellbeing and trust, reducing long-term costs.

No

Annually, or following significant change to service or a restructure.

Full OSC

# The subject matter of this report deals with the following Council Objectives

People - Supporting our residents to stay safe and well

Place - A great place to live, work and enjoy Resources - Enabling a residentfocused and resilient Council

Resources - Enabling a resident-focused and resilient Council

## **SUMMARY**

The changes to the Policy have been updated to ensure compliance with the Ombudsman codes for handling complaints. The HO code self-assessment is due by the 30<sup>th</sup> September 2025 and the new Policy must be published to meet full compliance. The Policy changes must also be brought in preparation for the self-assessment against the LGSCO complaints handling code due to be in force in April 2026.

The changes have also taken into account the LGSCO review around handling statutory children's social care complaints handling.

# RECOMMENDATIONS

Policy changes to be agreed and August 2025 version to be published on the Council website no later than the 30 September 2025.

## REPORT DETAIL

This report contains information regarding changes to the Policy and the compliance against the complaints codes and complaints handling. Different areas within the Policy have different stages and this is all accounted for in the new Policy.

Changes made to how the Policy reads for clarity and transparency and changes made to the Policy, as listed:

**Ombudsman Complaints Handling code Compliance** 

Ombudsman Complaints Handling Code Compliance				
Page 3	Definition of a complaint changed to definition set by the Ombudsman			
	Added `A resident does not have to use the word 'complaint' for it to be treated as such'			
Page 3	Vexatious behaviour changed to Unacceptable behaviour			
and 11				
Page 4	Added 'however a complaint will not prevent, stall or impact on actions			
	needed to resolve any immediate issues.'			
Page 6	Matters outside of the Complaints Policy – Contact details for each area for			
	clarity added			
Page 13	Added 'There is a 12-month limit in which a complaint can be made from the			
	time that the matter occurred or from the time, it came to the attention of the			
	customer. If your complaint is older than 12 months we may still be able to			
	consider it if there are extenuating circumstances that led to the delay of the			

complaint being made, and it is still possible to investigate the complaint effectively and fairly.'
Acknowledgement target changed from 3 days to 5 – This allows the provision that if a complaint can be answered, it can be done within 5 days as opposed to a further 10 days that is currently in place. A response cannot be made in 3 days.
Added Stage One 'a response will be in ten days from the date of your acknowledgement' If we are able to respond within 5 working days, we will do so.
If a response cannot be provided within 5 working days, it will be issued no later than 10 working days from the date of acknowledgement.
Added Stage Two 'we will allow a further 20 working days' Changed from 10 in line with the code.
Previously stated 'if they wish to escalate to stage two they must provide reasons why'. This is against Ombudsman compliance and has been removed.
Added 'In instances where a complaint is declined to be escalated, we will clearly communicate in writing our reasons for not escalating as well as the details of your right to approach the Ombudsman about its decision'
Added – 'those relating to social landlord services. We are committed to ensuring our complaints handling processes are fair, transparent, and accessible, and that they meet the standards set out by the Ombudsman. To demonstrate our compliance, we have completed a self-assessment against the Code and published our Annual Complaints Performance and Service Improvement Report.'
Stage One complaint response changed from 7 working days to 10 working days in line with the Ombudsman compliance. This was incorrect on the previous policy.
Added 'Confirm in all responses:

**Statutory Social Care and LGSCO Guidelines** 

Page 5	Added ways to complain 'Through Digital Apps such as Mind of My Own'
	for young people and children to express their feelings.
Page 21	Added 'The final response <b>must</b> be sent no later than six months from the date the complaint was first received. The regulations allow councils to in special circumstances extend this timescale, however this should only be necessary'
Page 20 and 22	Acknowledgement target changed from 3 days to 5 – This allows the provision that if a complaint can be answered, it can be done within 5 days as opposed to a further 10 days that is currently in place. A response cannot be made in 3 days.

ı	
	Added Stage One 'a response will be in ten days from the date of your
	acknowledgement' If we are able to respond within 5 working days, we will
	do so. If a response cannot be provided within 5 working days, it will be
	issued no later than 10 working days from the date of acknowledgement.
	Added - 'Your Stage Two complaint will be acknowledged with your

# Page 23

Added – 'Your Stage Two complaint will be acknowledged with your statement of complaint, within 5 working days from the date of receipt, or if the Stage two request has been made verbally, from the date of an agreed statement between the customer and the Council.'

Added 'However, if there are extenuating circumstances that led to the delay of requesting the escalation being made, and it is still possible to investigate the complaint effectively and fairly, the Stage Two request will be considered.'

Added - 'In certain circumstances a complaint may be eligible for early referral to the Local government Ombudsman rather than continuing to Stage three. This decision will be based on a case by case and details of what may be considered are below

- The Stage two has delivered a robust report and adjudication, and all complaint points have been upheld
- The Council has provided a clear action plan and agreed to meet most of or all the complainants' outcomes.

If the Council feels early referral is appropriate, we will write to the customer confirming the agreement and reasons why and to advise them to contact the Local Government Ombudsman.

# Other

Page 13 Page 14	Added - To support fair and timely complaint handling, the Council encourages submissions to be clear, proportionate, and focused.  Excessively lengthy or unfocused complaints may limit our ability to respond effectively. We may ask for the points to be clarified before we are able to complete a full investigation.'  Added as per Building Regulations - This includes but is not limited to  Building Control services, inspections, approvals and enforcement  Factually incorrect information about the requirements of the Regulations  Where the council has decided a structure is dangerous and has demolished it without giving the owner an opportunity to carry out the work.  Delays in carrying out inspection of enforcement works
	A failure to keep proper records.
Page 15	Added 'However, complaints about staff conduct that relate to disciplinary matter, may be redirected to Human Resources, where they can addressed through internal HR processes.
Page 19	Added section in relation to process when handling TMO process in line with the Housing Regulator

Added for young adults and children to express their feelings

# **REASONS AND OPTIONS**

# Reasons for the decision:

To ensure Havering Council is fully compliant with the complaints handling codes set by the HO and LGSCO and in line with the Social Housing Regulator and the Children's Act.

Already agreed by ELT and Lead Member for the Council

# Other options considered:

None – changes are required to meet compliance and good practice guidance

# **IMPLICATIONS AND RISKS**

# Financial implications and risks:

<u>Compensation Orders:</u> The Ombudsman can order landlords to pay compensation to residents. In 2023–24, over £4.9 million in compensation was ordered or recommended, a significant increase from the previous year.

<u>Non-compliance:</u> Leads to higher compensation awards due to findings of maladministration or service failure.

<u>Complaint Handling Failure Orders (CHFOs):</u> If a landlord fails to comply with the Code or does not complete the required annual self-assessment, the Ombudsman may issue a CHFO. These orders can lead to:

- Mandatory corrective actions.
- Increased scrutiny and oversight.
- Potential reputational damage that may affect funding or partnerships
- Operational Costs: Poor complaint handling leads to escalated cases, which are more resource-intensive. The Ombudsman reported a 60% increase in formal investigations, with each case generating multiple orders and recommendations

### Legal implications and risks:

<u>Maladministration Findings</u> Both Ombudsmen can issue findings of maladministration or service failure if complaints are mishandled or statutory procedures are not followed. These findings are published and can lead to reputational damage and increased scrutiny.

<u>Complaint Handling Failure Orders (CHFOs)</u> The Housing Ombudsman can issue CHFOs for non-compliance with the Code. These are formal directives requiring corrective action and are publicly reported

<u>Judicial Review Risk</u> Courts have ruled that complaints should generally be resolved through the Ombudsman rather than judicial review. However, failure to follow statutory procedures may still expose councils to legal challenge if complainants argue their rights were breached

<u>Contractual and Third-Party Liability</u> Councils must ensure that any Third-party providers or contractors delivering public services comply with statutory complaint procedures. Failure to do so may result in legal liability for breaches of duty

# **Human Resources implications and risks:**

<u>Staff Accountability and Performance</u> Failure to comply with the Code may expose gaps in staff training, supervision, and complaint-handling competence. Staff may be held accountable for poor decision-making or delays, especially if complaints escalate to formal investigations or legal action.

<u>Training and Development Gaps</u> The Code requires staff to be trained in fair, transparent, and timely complaint resolution. Non-compliance highlights deficiencies in professional development and may necessitate urgent remedial training, increasing HR workload

<u>Workforce Morale and Retention</u> Poor complaint handling can lead to increased stress and burnout among frontline staff, especially if they face resident frustration or media scrutiny. High turnover may result if staff feel unsupported or blamed for systemic failures

<u>Recruitment Challenges</u> Reputational damage from non-compliance may deter skilled professionals from joining the organisation. HR may struggle to attract candidates to roles perceived as high-risk or poorly managed.

Employment Law Violations If staff mishandle complaints involving safeguarding, discrimination, or misconduct, it may breach employment laws such as the Equality Act 2010 or whistleblowing protections

<u>Data Protection Breaches</u> Mishandling sensitive complaint data (e.g. about children or families) can violate GDPR and the Data Protection Act 2018, leading to fines and reputational damage

<u>Training and Competency Failures</u> HR may be held accountable if staff are not adequately trained in statutory complaints procedures, especially those working in Children's Services

<u>Safeguarding Failures</u> Mishandling complaints involving vulnerable children can trigger safeguarding investigations, which may implicate HR in failing to uphold duty-of-care standards

# **Equalities implications and risks:**

<u>Breach of Equality Duties</u> Landlords must give due regard to the needs of residents with protected characteristics (e.g. disability, race, age, gender, religion). Non-

## Cabinet, 17 September 2025

compliance with the Code may result in indirect discrimination, especially if complaint processes are inaccessible or inconsistently applied

<u>Failure to Make Reasonable Adjustments</u> The Code requires landlords to adapt complaint procedures to meet individual needs (e.g. providing information in alternative formats, offering support for neurodiversity or disabled residents). Ignoring these duties may breach the Equality Act 2010, exposing the organisation to legal claims

<u>Disproportionate Impact on Vulnerable Groups</u> An Equality Impact Assessment (EqIA) conducted by the Ombudsman found that poor complaint handling disproportionately affects ethnic minorities, disabled residents, and digitally excluded individuals. 20% of respondents to the Code consultation were from ethnic minority backgrounds, and many highlighted the importance of fairness and transparency in complaint handling

<u>Inequitable Access to Services</u> Failure to act on complaints may result in children from protected groups receiving inferior services or support, undermining statutory obligations under the Children Act 1989 and the Equality Act

<u>Safeguarding Failures</u> Complaints involving discrimination or exclusion may mask deeper safeguarding concerns. Ignoring these can lead to serious harm and regulatory scrutiny

<u>Loss of Trust</u> Families and children may lose confidence in the complaints process, especially if they feel their concerns are dismissed due to bias or systemic inequality

# Health and Wellbeing implications and Risks

<u>Physical Health Risks</u> Poor complaint handling can delay resolution of issues like damp, mould, heating failures, or unsafe structures. These conditions are linked to respiratory illnesses, cardiovascular problems, injuries, and infectious diseases such as influenza and tuberculosis.

Mental Health Impact Unresolved complaints and lack of responsiveness can cause stress, anxiety, and feelings of helplessness among residents. Vulnerable groups, including older adults and those with disabilities, are particularly at risk of mental health deterioration when housing issues persist

<u>Safeguarding Failures</u> The Code explicitly states that complaints involving safeguarding and health and safety must not be excluded. Non-compliance may result in missed opportunities to protect residents from harm, especially in cases involving domestic abuse, neglect, or unsafe environments.

<u>Barriers to Accessing Support</u> If complaint processes are not accessible (e.g. for neurodiversity residents or those with language barriers), individuals may be unable to raise concerns that affect their wellbeing

<u>Increased Risk of Harm Complaints</u> may highlight safeguarding concerns such as abuse, neglect, or bullying. Failure to investigate or escalate these can expose children to continued harm

<u>Breakdown in Multi-Agency Coordination</u> Statutory complaints often require joint responses from health, education, and social care. Poor handling can disrupt safeguarding protocols and delay protective action

<u>Loss of Trust and Voice</u> Children who feel ignored or dismissed may disengage from services, internalise distress, or stop reporting concerns altogether

<u>Trauma Reinforcement Mishandling complaints—especially those involving previous trauma—can re-traumatise children and undermine recovery</u>

# **BACKGROUND PAPERS**

This is based on the compliance requirements against the Housing Ombudsman Complaints handling code published in April 2024

The Complaint Handling Code | Housing Ombudsman Service

And the compliance requirements against the Local Government and Social Care Ombudsman Complaints handling code due to be published in April 2026 Complaint Handling Code - Local Government and Social Care Ombudsman

Legislation also considered:

- The Local Authority Social Services and National Health Service Complaints (England) Regulations 2009.
- Section 24 (D) and 26 Children Act 1989.
- The Children Act 1989 Representations Procedure (England) Regulations 2006.
- the Advocacy Services and Representations Procedure (Children) (Amendment) Regulations 2004
- Freedom of Information Act 2000.
- UK GDPR and Data Protection Act 2018.
- Re-Use of Public Sector Information Regulations 2005.
- Environmental Information Regulations 2004.
- Human Rights Act 1998.
- Equality Act 2010.
- Localism Act 2011.
- Social Housing (Regulations) Bill.
- DWP Regulations.
- Social Services and National Health Service Complaint Regulations 2009 and the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, the Council has a duty act fairly and proportionately
- This policy also outline the council's responsibilities to ensure member conduct and decision-making are lawful and fair

London Borough of Havering

# Complaints and Compliments Policy and Procedures 2025

Complaints and Compliments Policy and Procedure includes procedures for Social Care complaints, Housing complaints and Data Protection complaints

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# Introduction

The Council defines a complaint as "an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents"

Havering Council provides a wide range of services to many people, and we aim to deliver these services to the highest possible standards. Your complaints and concerns and compliments are important to us.

This policy is aimed at anyone who is dissatisfied with any services delivered by the Council and is considering contacting us seeking a viable solution, a resident does not have to use the word 'complaint' for it to be treated as such.

We also encourage those who would like to praise or provide positive recognition for a job that you feel we have done well.

# **Purpose**

Our right first-time approach to complaints is driven by the <u>Council's Vision</u> "The Havering you want to be part of" and focusing on "things that are important to our residents" and making sure Havering is "a great place to live, work and enjoy".

We pride ourselves on treating everyone fairly no matter the circumstances and we are keen to understand our customers' experiences of the services we deliver to all our customers and use learning to improve any identified service failures.

This policy supersedes:

- The Corporate Complaint Policy and Procedure.
- Unacceptable Behaviour around Complaints.
- Adult Social Care Complaints and Compliments Policy.
- Children and Young People's Complaint Procedure.

We have also included a guide to Member's enquiries and Freedom of Information requests to ensure all processes are aligned.

# **Policy summary**

# Scope

Our complaint process has been tailored to accommodate all (statutory and corporate) complaints to ensure a clear consistent approach across all areas of the organisation, which will be more efficient and easier to communicate. This process will allow us to determine each complaint on its own merits. We will investigate all complaints to allow us to identify any service failures, and will review all compliments, which in turn will allow us to act on learning opportunities, ensuring the lessons learnt, both good and bad, reach those officers in the Council who can affect change.

A good complaints process will comply with the law (statutory complaints). Those which are non-statutory complaints are addressed in this policy under the corporate complaints process.

The Council will seek to resolve complaints at the earliest opportunity. Where possible, every attempt will be made to deal with the issues quickly, however a complaint will not prevent, stall or impact on actions needed to resolve any immediate issues.

Some complaints received by the Council have to be dealt with under a statutory process and our complaints policy will set out the difference between statutory and corporate complaints.

The attached procedures (Appendices 1-5) sets out how the Council will deal with any complaint coming into the Council including the necessary timescales set to investigate and respond to all complaints.

The Customer Insight, Information and Investigations Team are also responsible for access to information requests which do not fall within the scope of this policy. Freedom of Information (FOI) requests, Environmental Information Regulations (EIR) and Individual Rights Request, including Rights to Erasure and Rights to Rectification, are overseen by the Information Commissioner. Havering Council abides by their statutory guidelines and timescales.

# Legislation

This policy adheres to the following legislation:

- The Local Authority Social Services and National Health Service Complaints (England) Regulations 2009.
- Section 24 (D) and 26 Children Act 1989.
- The Children Act 1989 Representations Procedure (England) Regulations 2006.
- the Advocacy Services and Representations Procedure (Children) (Amendment) Regulations 2004
- Freedom of Information Act 2000.
- UK GDPR and Data Protection Act 2018.
- Re-Use of Public Sector Information Regulations 2005.
- Environmental Information Regulations 2004.
- Human Rights Act 1998.
- Equality Act 2010.
- Localism Act 2011.
- Social Housing (Regulations) Bill.
- DWP Regulations.
- Social Services and National Health Service Complaint Regulations 2009 and the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, the Council has a duty act fairly and proportionately
- This policy also outline the council's responsibilities to ensure member conduct and decision-making are lawful and fair

### **Guidance Documents**

- Local Government and Social Care Ombudsman complaints handling code (Due April 2026)
- Housing Ombudsman complaints handling code (April 2024)
   Good Practice Guidance Children's Statutory Complaints Procedure updated November 2023

### **Timescales**

This Policy will apply from 1 October 2025 onwards. It will be subject to a review periodically to reflect any changes in legislation or Council practice.

# Aims, objectives and outcomes

We take General Data Protection Regulations (GDPR) seriously and will not use your information for anything other than for the purpose in which it was intended to be used. We treat all complaints the same and will ensure we investigate each part of the complaint robustly and consider our findings properly. We may share data with external contractors or agencies for the purpose of our investigation.

We ensure that our procedures are simple, to guarantee our customers know where and how to complain and have easy access to our complaints system

Our objectives to handling our complaints are to adhere to our six key principles of complaint handling:

- 1. **Start off right** by providing a simple and time bound complaint process.
- 2. **Fix it early** through acknowledging mistakes and resolve complaints early.
- 3. Focus on what matters and put the customer at the heart of the process.
- 4. **Be fair** by providing impartial and objective complaint handling.
- 5. **Be honest**, open, accountable and provide clear reasons for decisions.
- 6. **Learn and improve** through regularly reviewing and measuring the satisfaction of our customer and the complaint procedure.

# **Policy**

The Council defines a complaint as "an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents"

The Council defines a **compliment** as "an expression of satisfaction, positive recognition or praise for a service, team or individual officer."

We accept feedback through all means including:

- Our online forms.
- Our call centre (01708 434343).
- By post (Town Hall, Main Road, Romford, RM1 3BD).
- In person through visiting and talking to a member of staff at any of our libraries.
- By emails received into the Council
- Through Digital Apps such as Mind of My Own

We will review all complaints and determine which of the following complaint types your complaint falls under:

- <u>Corporate Complaint</u> If a complaint does not fall under a statutory process then it is for us to determine how to respond to the complaint. Further information on the process is outlined in Appendix 1.
- <u>Statutory Complaint</u> The way we deal with complaints relating to Children's and Adult Social Care services, and now any complaints relating to our housing stock, is set down by legislation. As a result, the process and timelines for dealing with complaints may vary dependent upon the type of complaint being made. Please refer to Appendix 2, 3 and 4.

# **Data Protection Complaint**

The way we handle complaints related to your personal information is governed by data protection legislation. Therefore, complaints concerning data protection matters, such as Subject Access Requests, Freedom of Information, or Environmental Information Requests, will not be

processed under the Council's Corporate Complaint procedure. Instead, these complaints will be reviewed and responded to by the Customer Insight, Information & Investigations Team. Please refer to page 12 for further details.

 <u>Members' Enquiries</u> – Councillors and MPs are able to make enquiries and complaints on behalf of one of their constituents, however, if a customer has already raised a complaint the councillor will not be able to also raise the same complaint on behalf of the customer, and vice versa.

## Matters outside the Scope of the Complaints Procedure

There are certain issues that fall outside the scope of the Council's complaints process, as they are more appropriately addressed through alternative statutory or legal channels. In such cases, we will not investigate the matter as a complaint. Examples include, but are not limited to, the following:

## Penalty Charge Notices (PCNs):

Appeals against parking tickets or traffic fines should be made through the appropriate parking enforcement process.

Appeal against a parking ticket or traffic fine | Parking tickets and traffic fines | London Borough of Havering

## • Planning Applications and Enforcement:

Objections or appeals related to planning decisions must be submitted through the planning appeals process.

Planning appeals search | Planning searches | London Borough of Havering

#### Council Tax Enforcement:

Disputes regarding Council Tax enforcement should be directed to the relevant Council Tax team.

For further guidance, please contact us via the <u>Contact us – London Borough of Havering</u> or call 01708 434 343.

#### • School Admissions and Transport Appeals:

Appeals concerning school placements or school transport must follow the statutory school appeals process.

Appeal for a school place | London Borough of Havering

#### Housing Appeals:

Appeals or reviews related to housing decisions should be submitted through the housing appeals process.

Appeals and reviews | Apply for council housing | London Borough of Havering

#### • Legal Proceedings or Separate Appeals Processes:

Where legal action has already commenced, or where a separate statutory or regulatory appeals process exists, the matter cannot be addressed through the complaints procedure.

For further guidance, please contact us via the <u>Contact us – London Borough of Havering</u> or call 01708 434 343.

## **How to Complain**

For all complaints, we will provide customers with an acknowledgement, conduct a full and thorough investigation and try to resolve your issue at the first point of contact.

You can raise your complaint via different avenues, our preferred contact is through our <u>online complaint form</u> as this will be received by the Complaints Service instantly. However, we pride ourselves on treating everyone fairly and offer alternative routes to log a complaint if required. This could be through calling our contact centre on 01708 434343 speaking to a member of staff directly or via email to an officer of the Council.

We will maintain the confidentiality of all personal information and will not disclose it outside Havering Council without your permission unless we are legally obliged to do so. However, if we are informed of anything that makes us think that an individual is unsafe or at risk of being harmed, we will pass this on to the appropriate authority or service for action.

When someone has suffered an injustice, we try to put them back in the position they would have been had that error not occurred. Our focus is on restoring services that have been denied and taking practical steps to put things right. Where that isn't possible, we will try to think of creative remedies that acknowledge the impact of faults. We look at the injustice that has occurred and then use the <a href="Housing Ombudsman">Housing Ombudsman</a> and <a href="Local Government and Social care">Local Government and Social care</a> Ombudsman guidance on remedies to objectively decide what is an appropriate remedy for that injustice. For more information on the remedies Havering Council offer please see Remedies section on pages 10-11.

## How long will the complaint take to investigate

Please note that **extensions to response times** may be applied if required. Further details regarding extension procedures and circumstances can be found in **Appendix 1 - 4.** We will ensure that you are **kept informed** if any extensions are necessary during the complaints process.

## **Corporate Complaints**

## Stage One

- Investigated by the service and reviewed by the Complaints Team
- Acknowledgement: Within 5 working days
- **Response**: Within 10 working days from the date of acknowledgement

#### Stage Two

- Investigated independently by the Complaints Team
- Acknowledgement: Within 5 working days
- **Response:** Within 20 working days from the date of acknowledgement

#### **Statutory Housing Complaints**

#### Stage One

- Investigated independently by the Complaints Team
- Acknowledgement: Within 5 working days
- Response: Within 10 working days from the date of acknowledgement

#### Stage Two

- Investigated independently by a different officer in the Complaints Team
- **Acknowledgement:** Within 5 working days
- **Response:** Within 20 working days from the date of acknowledgement

### **Tenants Management Organisation (TMO) under Statutory Housing Complaints**

#### Stage One

- Investigated by TMO Management team
- **Acknowledgement:** Within 5 working days

Response: Within 10 working days from the date of acknowledgement

## **Stage Two**

## **Investigated independently by Complaints Team**

- Acknowledgement: Within 5 working days
- Response: Within 20 working days from the date of acknowledgement

### **Statutory Adults Complaints**

#### Stage One

- Investigated by the service and reviewed by the Complaints Team
- Acknowledgement: Within 5 working days
- Response: Within 10–20 working days from the date of acknowledgement
- Up to 25 working days if the complaint involves another agency

**Note:** There is no Stage Two process for Statutory Adults Complaints.

### **Statutory Children's Complaints**

#### Stage One

- Investigated by the service and reviewed by the Complaints Team
- Acknowledgement: Within 5 working days
- Response: Within 10 working days from the date of acknowledgement

## **Stage Two**

- Investigated independently by the Complaints Team and an external Independent Person
- Acknowledgement: Within 5 working days
- Response: Within 25 working days from the date the Statement of Complaint is agreed
- May be extended up to a maximum of 65 working days

#### **Stage Three**

- Managed by Democratic Services in conjunction with the Complaints Team
- Acknowledgement: Within 5 working days
- Panel Hearing: Held within 30 working days from the date of request
- Panel Hearing Outcome: Issued within 5 working days from the date of the hearing
- Final Response: Issued within 15 working days from the panel's final decision

#### What are the differences between complaints?

Havering Council welcomes feedback on their performance and uses this to improve our services. If you have experienced an unsatisfactory service from Havering Council and are considering contacting us to seek a viable solution. However, any customer that express dissatisfaction will be given a choice to make a complaint

As identified above, a **statutory complaint** relates to the services received from Children's and Adults Social Care, and now any complaints related to housing matters (Inc. repairs, Anti-Social Behaviour (ASB) and homelessness), whereas a **Corporate Complaint** relates to all other services provided by Havering Council. A **Data Protection complaint** refers to complaints regarding the handling or use of your data.

## What is the difference between a complaint and a service request

A complaint is "an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents" Complaints may relate to delays, poor communication, staff conduct, or failure to meet agreed standards.

In contrast, a service request is a contact made to the Council to request a specific service or report an issue for the first time—such as reporting a missed bin collection, requesting a repair, or asking for information. If following a request for service, the issue persists or the response is unsatisfactory, this can be raised as a complaint.

## What is the difference between a complaint and member enquiry?

A Member's Enquiry is "a request for information, the clarification of circumstances or further information for a particular situation or constituent, or the notification of dissatisfaction with a service."

Councillors and MPs are able to enquire or make a complaint on behalf of their constituents, at their request, through the usual complaint process. However, if a customer has already logged a complaint, we will not be able to accept a duplicate complaint on their behalf through a councillor/MP. If the councillor/MP would like to follow up on the progress or outcomes of a complaint that a constituent has already raised, this will be treated as a member's enquiry and would need to follow the relevant complaint process.

Any councillor/MP involvement will follow the same processes outlined in this policy.

Please note: that councillors/MPs may respond to any constituent enquiry submitted. If the enquiry results in a complaint being raised directly with the Council the complaint will then follow the processes outlined in this policy where the relevant timescales will apply.

## Who can complain

For our **corporate complaint process**, anyone can complain who uses, has used or is affected by the services we provide.

For our statutory complaints process, you can complain if you:

- Receive or have received a service from Havering Adult Social Care.
- Are acting on behalf of a service user (with their consent).
- Are acting on behalf of a service user who has died, or is unable to make a complaint due to, physical incapacity or lacks capacity within the meaning of the Mental Capacity Act 2005 (16 years plus) and who is acting in their best interest and the service user has not previously indicated that they did not want that person representing them before they died/lost capacity.
- A child or young person and a parent or someone with parental responsibility for a child/young person who is either looked after by the local authority or is a child in need.
- A child or young person, or an individual involved in fostering, adoption or Special Guardianship arrangements.
- A care leaver to the Local Authority about services under the Children Act.
- Someone acting on behalf of a child or young person who the local authority considers has sufficient interest in the child and whose views the Council consider to be relevant. Consent and views will be sought from the child where appropriate.
- Someone who is acting on behalf of a child or young person who is unable to make a complaint due to:

- Lacking capacity within the meaning of the Mental Capacity Act 2005 and who is deemed to be acting in their best interest.
- An adult relating to a child or young person but not on behalf of the child or young person. The local authority will determine if there is sufficient interest in the child's welfare and seek the child or young person's consent where appropriate.
- A tenant/or anyone living in a property which the Council owns or manages.

## **Support**

We pride ourselves on treating everyone fairly, should you need help with the complaints process, either understanding of the policy or helping to raise a complaint, we will always try to find someone to support and assist you including organising any translation or interpreting services required.

The Council has a positive approach to complaints. The Council will provide assistance to people who have difficulty accessing or using the complaint form and provide alternative means of making a complaint when required.

Should you require any support or assistance with alternative methods of contact our staff are available to assist at any of our buildings, including our Libraries, or alternatively you could call our contact centre on 01708 434343 who will help you or transfer you to our Customer Insight, Information and Investigations Team.

## Ownership and authorisation

This policy has been written by the Corporate Policy and Performance Lead and is owned by the Director of Customer Services.

The policy was taken to Cabinet in July 2023, where it was formally agreed upon and a final copy was made available for publication.

The Council reserves the right to make amendments to this policy at short notice, or in any situation that warrants an immediate amendment being introduced.

#### Remedies

A remedy is the means by which we put things right after some level of maladministration has been identified. The Council's approach to remedies is based on our six complaint principles as outlined in the policy. The Local Government and Social Care and Housing Ombudsman remedies guidance is also is also taken into consideration when assessing a case

We will be fair by treating each case individually and ensure the remedy is fair when considering the specific circumstances of the case. We will look at the severity of the maladministration/service failure and the impact that this has had on the individual.

We will be honest and explain how we will correct the service failure.

We will then learn from each case. We will look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.

There are different types of remedies in relation to Complaints handling and service failures. Havering follows the guidance set by the Local Government and Social Care Ombudsman and Housing Ombudsman in line with the Ombudsman remedies guidance.

The different remedies that the Council could offer include:

- **Apology** In some circumstances, a customer may feel that an apology is all that is required. An apology will be made in writing or in person.
- **Specific actions** We will consider whether there is some practical action which would provide all or part of a suitable remedy. Including:
  - Looking at our contractual arrangements to see if there are any amendments required to improve the service offered.
  - Looking at making changes to our policies, procedures, systems, staff training, or all of these, to ensure that the maladministration is not repeated.
- Financial Remedy— We will consider offering a financial remedy where it is deemed appropriate. All calculations will be based on what is considered fair on a case by case basis as outlined below.

Our staff use their discretion to decide on the best remedy for a case and may therefore set out a remedy that does not fall into one of the categories above but is tailored to the individual circumstances of that particular case.

## **Financial Remedy**

The Council will consider if there has been an actual, evidenced financial loss incurred as a direct result of the maladministration and if any remedy should be offered to the customer for all or part of this loss, taking into consideration the specific circumstances of that case.

The council will not offset any financial remedies against any existing rent or other arrears owed to the council, unless it is requested by the customer.

# **Unacceptable Behaviour around Complaints**

Some customers place unreasonable demands on the Council by submitting multiple, sometimes repetitive or occasionally abusive requests, these contacts may dominate our staffs' attention.

As a Council we do not view behaviour as unacceptable just because a claimant is forceful or determined. We understand that some customers are upset and angry about the issues they have raised, however the actions of customers who are aggressive, demanding, persistent or continually rude may result in unreasonable demands on the Council and unacceptable behaviour towards the Council's staff.

When this happens, we have to take action to protect the health and wellbeing of our staff, who have the right to do their jobs without fear of being abused or harassed. In these circumstances, the Council will start by explaining why we feel the behaviour is inappropriate and ask that this is changed. If the behaviour continues, the Council has the right to make the decision to restrict contact with the customer. On these occasions, the Council will send a refusal notice to the customer specifying how the current individual complaint will be handled.

If we have restricted our contact with a claimant and they make a new complaint regarding a different matter, the Council will make a decision on a case by case basis whether or not to continue with any restrictions that have been put in place for the earlier complaint.

The Council refers to the Local Government and Social Care Ombudsman Unreasonable Complainant Behaviour and the Housing Ombudsman Unacceptable User Action Policy when we are faced with these situations.

# Access to Information Procedure – Data protection complaints procedure

When you use a Council service, the personal data you provide is required for statutory, legal, or contractual reasons, or with your consent. The Council processes personal information in compliance with their privacy notice and relevant data protection laws. You can access recorded information held by the Council unless it is exempt. If an exemption applies, we will notify you of the specific exemption being used and the reason for its application.

There are several methods to access information held by the Council, including the following:

- Freedom of Information request (FOI) relate to the business dealings of the Council. The Council has **20 working days** to provide a response. FOI requests must always be in writing.
- Environmental Information request (EIR) relate to requests for information relating to noise, air pollution, emissions, soil, buildings and animals, as well as images, video & audio recordings. The Council has 20 working days to provide a response. All EIRs should be made in writing, although we will accept requests verbally if necessary.
- Internal Review if not satisfied with an FOI or EIR response, you have the right to request an internal review. The Council has 20 working days to respond, though if particularly complex, up to 40 working days is allowed.
- Data Protection / Subject Access Requests (SAR) relate to the personal information the Council hold about individuals, including staff. The Council has 30 calendar days to provide a response.
- Release of Public Sector Information requests to re-use the information contained within responses received from the Council. The Council must respond to these requests within 20 working days.

Please note that a fee may be payable depending on the complexity and volume of the information being requested.

## Lodging a complaint

If you wish to raise a complaint regarding the processing of your <u>personal data</u>, or you are dissatisfied with how we have handled your personal information, you can lodge a complaint with the Havering Data Protection Officer (DPO) using the details below. <a href="mailto:dpo@havering.gov.uk">dpo@havering.gov.uk</a>

Your complaint will be investigated by the Information Governance Team and will be responded to as soon as possible.

If you are not satisfied with the response to your complaint, you have the right to lodge a complaint with the Information Commissioner as the following:

#### The Information Commissioners Office (ICO)

Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

**Telephone**: 0303 123 1113

#### casework@ico.org.uk

# Please note that the following applies to all complaints processes in the Appendices

- Anonymous complaints, where enough information is provided to be able to investigate, will be recorded and considered by the Complaints Manager and/or relevant service area manager, where appropriate, but no response will be provided.
- 2. The Council **will not usually** consider complaints raised where the subject matter is being considered in legal proceedings such as care, adoption, special guardianship and disrepair proceedings. A decision will be reached after taking legal advice whether the complaint can be taken under the statutory procedure.
- 3. There is a 12-month limit in which a complaint can be made from the time that the matter occurred or from the time, it came to the attention of the customer. If your complaint is older than 12 months we may still be able to consider it if there are extenuating circumstances that led to the delay of the complaint being made, and it is still possible to investigate the complaint effectively and fairly.
- 4. Complaints that have previously been considered will not be investigated again unless new information is provided.
- 5. In instances that the Council decides not to accept a complaint at any stage, an explanation will be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman.
- 6. We will update you and keep you informed every 10 working days on complaints that fall outside of the extension periods in adherence with the Ombudsman guidelines and code.
- 7. If a complaint at any stage exceeds the extension timescale customers can approach the Housing or Local Government and Social Care Ombudsman Service
- 8. Councillors/MPs should not email officers directly as there will be no record of the request coming through, these should be logged through the usual complaint processes.
- 9. To support fair and timely complaint handling, the Council encourages submissions to be clear, proportionate, and focused. Excessively lengthy or unfocused complaints may limit our ability to respond effectively. We may ask for the points to be clarified before we are able to complete a full investigation.
- 10. Members are not automatically entitled to sensitive/personal information, i.e. social care support plans or personal health data.

Information given to a councillor must only be used for the purpose for which it was requested. The Council is committed to treating all customers with courtesy and respect, and expects the same standard of behaviour towards its staff. Any form of rude, abusive, or violent conduct directed at Council staff will not be tolerated. Further details are provided in the 'Unacceptable Behaviour around Complaints' section of this policy.

# **Appendix 1: Corporate Complaint Procedure**

All complaints will come into the triage team who will identify which route the complaint will follow. We aim to contact you within five working days. The Council has a two-stage Corporate Complaint procedure in place. Corporate Complaints covers areas such as but not limited to:

- Council Tax
- Benefits
- Bereavements and Registrations
- Public Protection
- Streets and Trees

## **Areas relating to Building Regulations**

This includes but is not limited to:

- Building Control services, inspections, approvals and enforcement
- Factually incorrect information about the requirements of the Regulations
- Where the council has decided a structure is dangerous and has demolished it without giving the owner an opportunity to carry out the work.
   Delays in carrying out inspection of enforcement works
- A failure to keep proper records.

## Areas we may not consider under complaints:

Damage to property caused by a neighbour's inadequate building work. This would normally be a matter for private legal action against your neighbour, where you have a right of appeal dispute about the quality of work. The quality of work is the responsibility of those who commissioned it and those who do the work.

Works done before purchase, a buyer would be expected to have carried out a full survey before completion of buying a property.

Missed Bin Collections

Penalty Charge Notices

#### We will:

- Acknowledge your contact within 5 working days detailing our understanding of your enquiry and the next steps.
- We will thoroughly review and investigate your concerns and respond to you, aiming to get things right first time, within 10 working days from the date of your acknowledgement
- Allow an additional **10 working days** for those complaints which require longer to investigate. In these instances, it will be agreed by both parties in advance.
- Address all points raised in the complaint and provide a clear reason for any decisions.
- Incorporate any additional complaints raised during the Stage 1 complaint, if relevant to the original complaint. Where the response has been issued or unreasonably delay the response, a new Stage 1 should be logged.
- Confirm in all responses:
  - o The complaint stage and definition.
  - o The decision (including the reasons) on the complaint.
  - Details of any remedy offered to put things right.
  - Details of any outstanding actions.
  - How to escalate to Stage 2 if the customer is not satisfied.

- For those complaints which progress to Stage 2, we will conduct a further thorough and proportionate investigation and provide a full, clear and honest response within 20 working days.
- Should we identify that the investigation is more complex, we will allow a further **20** working days. In these instances, it will be agreed by both parties in advance.
- Confirm in all responses:
  - o The complaint stage and definition.
  - o The decision (including the reasons) on the complaint.
  - Details of any remedy offered to put things right.
  - Details of any outstanding actions.
  - How to escalate to the Ombudsman if the customer is not satisfied.

When a complaint is made verbally, the officer will record the details of the complaint and the outcome the customer is seeking. If the officer is able to quickly resolve the complaint they should do so. Otherwise details of the complaint and the desired outcome should be agreed with the customer and forwarded to the Customer Insight, Information and Investigations team, where they will triage the complaint, confirm the understanding of the issues raised and will immediately start the complaint process.

Sometimes complaints concern two or more service areas or departments. The Council will usually provide one co-ordinated response unless agreed otherwise.

The Council takes complaints about staff very seriously. Complaints about staff should be made directly to the Council and will be considered under the formal Corporate Complaints Policy. However, complaints about staff conduct that relate to disciplinary matter, may be redirected to Human Resources, where they can addressed through internal HR processes. Where the complaint concerns an agency worker then the Council will coordinate any investigation with the relevant recruitment agency.

Once your complaint has completed the Council's complaints procedure, the Council cannot reopen a complaint which deals with the same matters.

The Customer Insight, Information and Investigations team will monitor performance in order to identify under performance and address any issues, identify any trends, ensure our customers are getting value for money.

## Right to escalation

The customer has the right to request the complaint be escalated if they remain dissatisfied. The customer will need to:

Request an escalation to Stage 2 following the guidance they will have received on their Stage 1 outcome response.

In instances where a complaint is declined to be escalated, we will clearly communicate in writing our reasons for not escalating as well as the details of your right to approach the Ombudsman about its decision

What happens if the customer is still dissatisfied once they have been through our complaints process?

If you remain dissatisfied following the review of your complaint, you will be informed of your right to refer the complaint to the Local Government and Social Care Ombudsman, who deal

with complaints about a number of council services, including planning, social care, housing benefit, environment and waste, transport and highways, council tax and some education matters and Housing, except Social Housing.

Telephone: 0300 061 0614

Website: <a href="www.lgo.org.uk">www.lgo.org.uk</a> (you can complete an online form under "Contact us")

Address: Local Government and Social Care Ombudsman, PO Box 4771, Coventry CV4 0EH

# **Appendix 2 Housing / Social Landlord Complaints**

Under the provisions of the Social Housing (Regulation) Act, the Housing Ombudsman has been granted new powers to issue a statutory Code of Practice outlining the procedures that social landlords must have in place for handling complaints.

Havering Council fully adheres to this Code when managing statutory housing complaints and those relating to social landlord services. We are committed to ensuring our complaints handling processes are fair, transparent, and accessible, and that they meet the standards set out by the Ombudsman.

To demonstrate our compliance, we have completed a self-assessment against the Code and published our Annual Complaints Performance and Service Improvement Report. These documents are available below:

## Housing Ombudsman Code - Self Assessment - April 2024

## Housing Annual Complaints Performance and Service Improvement Report 2023 - 2024

Havering Council is committed to ensuring that all residents are aware of how to raise a complaint. We will continue to promote this information through a variety of accessible channels, including the At the Heart publication, the Residents' Handbook, and other relevant Council communications and platforms. This proactive approach supports our commitment to transparency, accountability, and continuous service improvement.

Responses at all stages will be provided when the answer is known and not when all outstanding actions are completed. Updates will be followed up on any outstanding actions.

## What can complaints be about?

In general terms, anything related to a Social Housing property that you rent from the Council, This includes but is not limited to:

- Repairs and maintenance of your home.
- Anti-social behaviour/tenancy issues.
- Sheltered Housing
- Repairs Rent

#### What is the complaint process?

Complaints relating to Havering Council stock follow a two-stage process:

They will start at **Stage 1** and we will:

- Acknowledge your contact within **5 working days** detailing our understanding of your complaint and the next steps.
- We will thoroughly review and investigate your concerns and respond to you, aiming to get things right first time, within 10 working days from the acknowledgment of your complaint.
- Allow an additional 10 working days for those complaints which require longer to investigate. In these instances, it will be agreed by both parties in advance.
- Address all points raised in the complaint and provide a clear reason for any decisions.

- Incorporate any additional complaints raised during the Stage 1 complaint, if relevant to the original complaint. Where the response has been issued or unreasonably delay the response, a new Stage 1 should be logged.
- Confirm in all responses:
  - o Its understanding of the complaint.
  - o The outcomes the resident is seeking.
  - Which aspects they are and are not responsible for.
  - o If any aspect of the complaint is unclear, we will contact you for clarification
  - The complaint stage and definition.
  - o The decision (including the reasons) on the complaint.
  - Details of any remedy offered to put things right.
  - Details of any outstanding actions.
  - How to escalate to Stage 2 if the customer is not satisfied.

#### For **Stage 2** complaints, we will:

- Ensure that the person considering the complaint at Stage 2 is not the same person that considered/investigated the Stage 1 complaint, to ensure another independent investigation is undertaken at Stage 2.
- Acknowledge your contact within **5 working days** detailing our understanding of your enquiry and the next steps.
- Respond to all Stage 2 complaints within 20 working days of the complaint being acknowledged

Allow an additional **20 working days** for those complaints which require longer to investigate. In these instances, it will be agreed by both parties in advance.

- Confirm in all responses:
  - o It's understanding of the complaint.
  - o The outcomes the resident is seeking.
  - Which aspects they are and are not responsible for.
  - o If any aspect of the complaint is unclear, we will contact you for clarification
  - The complaint stage and definition.
  - The decision (including the reasons) on the complaint.
  - Details of any remedy offered to put things right.
  - Details of any outstanding actions.
  - How to escalate to the Ombudsman if the customer is not satisfied.

## Right to escalation

The customer has the right to request the complaint be escalated if they remain dissatisfied. The customer will need to:

a) Request an escalation to Stage 2 following the guidance you will have received on their Stage 1 outcome response.

Landlords must only escalate a complaint to Stage 2 once it has completed at Stage 1. If all or part of the complaint is not resolved to the customer's satisfaction at Stage 1 it must be progressed to Stage 2 of the landlord's procedure, unless an exclusion ground now applies. Please note that we have the right to decline a Stage 2 if the grounds are reasonable.

In instances where a complaint is declined to be escalated, we will clearly communicate in writing our reasons for not escalating as well as the details of your right to approach the Ombudsman about its decision

## **TMO complaints**

Complaints Involving Tenant Management Organisations (TMOs)

Some properties owned by Havering Council are managed by **Tenant Management Organisations (TMOs)**. These include **BETRA**, **PETRA**, and **DELTA**.

In accordance with the **Housing Ombudsman's Complaint Handling Code**, Havering Council is committed to **monitoring and reporting** on complaints related to TMOs.

However, the complaints process for **TMOs** follows a slightly different procedure: **Stage One**: The complaint will be investigated and responded to directly by the TMO's management team.

**Stage Two:** If you remain dissatisfied with the outcome, the complaint will be escalated and investigated by Havering Council's Complaints Team.

This approach ensures that TMOs are accountable for their services while maintaining oversight and consistency through the Council's complaints framework.

## **Completion of local complaints process**

If you/the customer remains dissatisfied with the response they/you can go direct to the Housing Ombudsman Service and they may be able to investigate how we dealt with the matter.

- Online complaint form: www.housing-ombudsman.org.uk/residents/make-a-complaint/
- Phone: 0300 111 3000
- Email: info@housing-ombudsman.org.uk
- Postal address: Housing Ombudsman Service, PO Box 1484, Unit D, Preston, PR2 0ET

# **Appendix 3: Statutory Adult Complaint Procedure - Social Care**

If you are dissatisfied about a statutory service, you have received from Adult Social Care we would welcome your feedback and will use this to improve both your experience of the service and how services can be improved in the future. Adult Social Care is committed to responding appropriately to complaints and will take appropriate steps to remedy service failures identified arising from complaints.

Where complaints do not show a service failure, this will be passed to the service to respond directly and an explanation will be provided. Adult Social Care will regularly review the lessons learnt from complaints to improve the quality of the service provided. If you do not receive a response from the service in agreed timescale, this can then be raised as a complaint.

## What can complaints be about?

Anything related to Adult Social Care, such as:

- An unwelcome or disputed decision.
- Concern about the quality of a service.
- Delay in decision making or providing a service.
- · Delivery or non-delivery of services.
- Quantity, frequency, change or cost of a service.
- Attitude or behaviour of staff . Application of eligibility and assessment criteria.
- · Assessment, care management and review.
- Change/closure of service.
- Financial issues.
- Working practices which are contrary to Havering's policies on:
  - Health and Safety.
  - Equal Opportunities.
  - o Racial, Harassment or Bullying.

When you make a complaint we will contact you to ensure that we understand fully. Where possible, we will also discuss what you would like to happen to help resolve your complaint. Where further clarification is required and we are unable to confirm the details, the case may be placed on pause until the case details have been confirmed.

## What is the complaint process?

- We will aim to acknowledge your complaint within 5 working days.
- Your complaint will be assessed to decide how it will be handled. A member of the Customer Insight, Information and Investigations team will discuss and agree this with you.
- We will aim to respond to your complaint within 10-20 working days from the date the complaint is agreed and/or required consent information is received.
- If your complaint involves another agency, e.g. health, home care services or residential/nursing home we will discuss this with you and the relevant agency to agree how the complaint should be handled. We will aim to **respond within 25 working days**.
- Mediation may be considered as a way to help resolve your complaint and this will be discussed with you if appropriate.
- We will keep you informed about the progress of your complaint and discuss any changes to the handling of your complaint with you.

- The outcome of a complaint will be provided in writing and will explain how the complaint
  has been considered, the conclusions reached and any remedial action which is
  necessary.
- The person who raised the complaint with us will be kept informed about any changes and the progress of their complaint including any delays with an explanation.

The final response **must** be sent no later than six months from the date the complaint was first received. The regulations allow councils to extend this timescale, however this should only be necessary in rare cases. Councils should be mindful that the longer it takes to respond to a complaint, the more it can add to an individual's injustice.

The final response to the complaint **must** set out the council's response to the issues raised, including any proposals of how to put things right if things went wrong through an apology, remedy or service improvements.

It **must** also clearly signpost the customer to the Local Government and Social Care Ombudsman. https://www.lgo.org.uk

## Right to escalation

If you have been through all stages of our complaints procedure and are still unhappy, you can ask the Local Government and Social Care Ombudsman to review your complaint. The Ombudsman investigates complaints in a fair and independent way - it does not take sides. It is a free service.

The Ombudsman expects you to have given us a chance to deal with your complaint, before you contact them. If you have not heard from us within a reasonable time, it may decide to look into your complaint anyway. This is usually up to 12 weeks but can be longer for social care complaints that follow a statutory process.

The Local Government and Social Care Ombudsman looks at individual complaints about councils and some other organisations providing local public services It also investigates complaints about all adult social care providers (including care homes and home care agencies) for people who self-fund their care.

Website: www.lgo.org.uk

Telephone: 0300 061 0614

Monday to Friday: 10am to 4pm (except public holidays)

# **Appendix 4: Statutory Children's Complaint Procedure**

## What can complaints be about?

In general terms anything related to the actions/omissions of Children's Services in connection with a child or young person who is looked after or in need of help and protection, such as:

- A disputed decision.
- Concern about the quality of a service.
- Delay in decision making or providing a service.
- Delivery or non-delivery of services.
- Quantity, frequency, change or cost of a service.
- Attitude or behaviour of staff,
- · Application of eligibility and assessment criteria.
- Application of a local authority policy which impacts on a child or young person.
- Assessment, care management and review.
- Change/closure of service.
- Financial issues.
- Working practices which are contrary to Havering's policies on:
  - Health and Safety.
  - Equal Opportunities.
  - o Racial, Harassment or Bullying.

When a complaint is made, the Customer Insight, Information and Investigations team will contact the person to ensure that the complaint is fully understood and where possible, discuss what they would like to happen to resolve the complaint and any support needed, such as advocacy. Where further clarification is required and we are unable to confirm the details, the case may be placed on pause until the case details have been confirmed.

#### What is the complaint process?

The complaint will be taken at **Stage 1**: Local Resolution:

- We will acknowledge your complaint within 5 working days.
- Your complaint will be discussed and agreed with you and advised on how it will be handled.
- You may be offered a mediation meeting with the service as part of Stage One
- You will have a response within **10 working days** with a further **10 working days** with agreement.

# Right to escalation

If you remain dissatisfied you can request to progress your complaint to the next stage (Stage 2) and this must be requested within 20 working days of the Stage One response. However, if there are extenuating circumstances that led to the delay of requesting the escalation being made, and it is still possible to investigate the complaint effectively and fairly, the Stage Two request will be considered.

If your complaint is progressed to Stage 2 – Independent Investigation:

 Your complaint will be progressed re-investigated by an independent investigator and overseen by an Independent Person. The Independent Person ensures the investigation is carried out fairly and in the best interests of the child.

- Your Stage Two complaint will be acknowledged with your statement of complaint, within 5 working days from the date of receipt, or if the Stage two request has been made verbally, from the date of an agreed statement between the customer and the Council
- Your complaint will be progressed to an Independent Officer and Independent Person, who may contact you in regards to your Stage Two Complaint
- An individual report will be produced following an investigation by the Independent Investigator after accessing relevant records and interviews with staff, where required.
- Your complaint will be reviewed following receipt of the Independent Investigator report and any comments by the Independent Persons reports by the Assistant Director/Director.
- Once your complaint has been concluded the decision and the reports will be sent to you.
- Mediation may also be considered during this stage if appropriate

Stage 2 Investigation can take between **25 working days**, from the date the Statement of Complaint being received, with a **maximum extension of up to 65 days**. Updates will be provided if the extension is required.

If you still remain dissatisfied you can request to progress your complaint to **Stage 3** – Review Panel. This must be requested within 20 working days of the Stage Two response. However, if there are extenuating circumstances that led to the delay of requesting the escalation being made, and it is still possible to investigate the complaint effectively and fairly, the Stage Three request will be considered.

In certain circumstances a complaint may be eligible for early referral to the Local government Ombudsman rather than continuing to Stage three. This decision will be based on a case by case basis

- The Stage two has delivered a robust report and adjudication, and all complaint points have been upheld
- The Council has provided a clear action plan and agreed to meet most of or all the complainants' outcomes.

If the Council feels early referral is appropriate, we will write to the customer confirming the agreement and reasons why and to advise them to contact the Local Government Ombudsman.

- If agreement is made to progress your Stage Three request, the process is as follows: A
  Stage 3 Review Panel will be held within 30 working days and you will be notified of the
  date.
- You can make representation to the Panel either in writing or in person.
- The Review Panel will review the Stage 2 investigation but will not reinvestigate the complaint.
- Following the Review Panel, the Chair will provide its recommendations to the Director of Starting Well within **5 working days**.
- The Director will send the decision to you within **15 working days** following receipt of Chair's recommendations.
- The outcome of a complaint will be in writing explaining how the complaint has been considered, the conclusions reached and any remedial action necessary.
- Mediation may be considered as a way to help resolve the complaint and this will be discussed if appropriate.
- The person who raised the complaint with us will be kept informed about any changes and the progress of their complaint including any delays with an explanation.

## **Completion of local complaints process**

Complaints, which are made against a local authority, are the responsibility of the Local Government & Social Care Ombudsman (LGSCO) who has the necessary remit to cover local government issues.

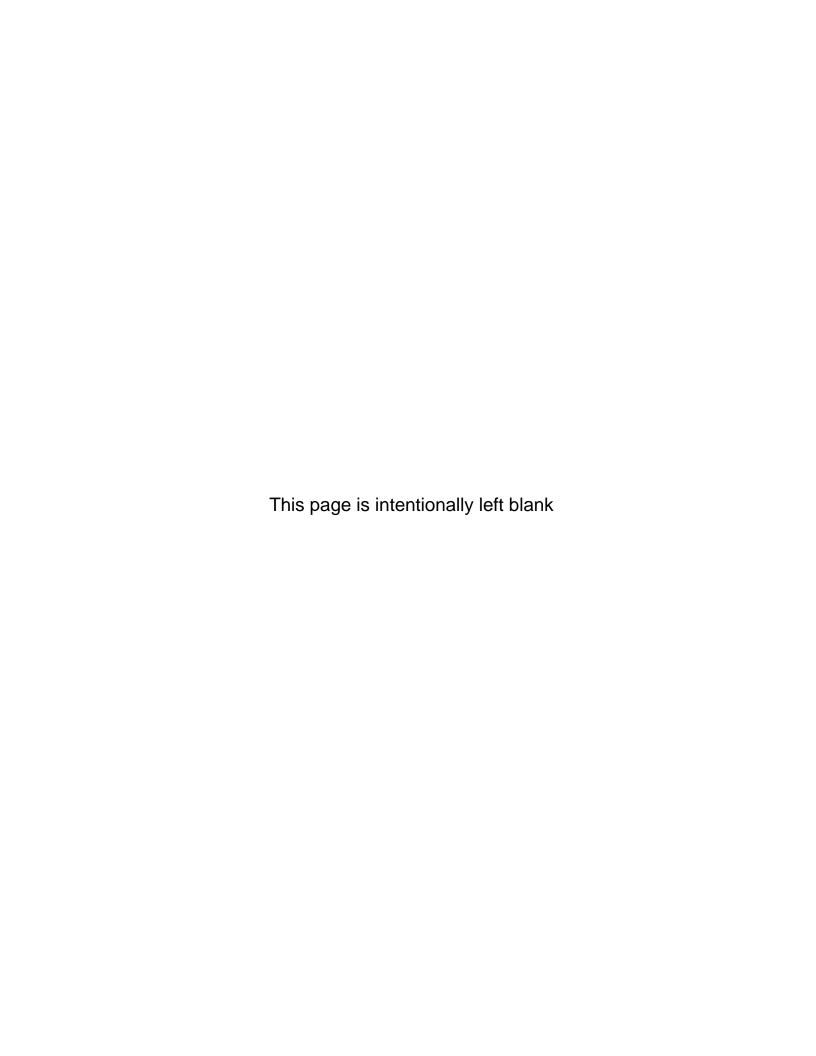
The Parliamentary and Health Service Ombudsman has the authority to carry out joint investigations of health and social care complaints.

The LGSCO can be contacted if dissatisfied with the outcome of a complaint. The LGSCO would expect a complaint to have gone through all three stages, before investigating a complaint. However they may consider early referrals.

Local Government & Social Care Ombudsman (LGSCO) PO Box 4771, Coventry CV4 0EH

Telephone: 0300 061 0614

Online: http://www.lgo.org.uk/adult-social-care





CABINET	
Subject Heading:	Corporate Plan Q1 Performance Report: (2025/26)
Cabinet Member:	Councillor Ray Morgon
ELT Lead:	Mark Ansell, Director Public Health
Report Author and contact details:	Jodie Gutteridge   Corporate Policy and Performance Lead Jodie.gutteridge@havering.gov.uk
Policy context:	The report sets out Quarter 1 performance for the metrics identified in the Corporate Plan for each of the three strategic priorities  - Supporting our residents to stay safe and well  - A great place to live work and enjoy  - Enabling a resident-focussed and resilient council
Financial summary:	There are no direct financial implications arising from this report. It is expected that the delivery of targets will be achieved within existing resources.
Is this a Key Decision?	No
When should this matter be reviewed?	The Corporate Plan Performance Report will be brought to Cabinet at the end of each quarter.
Reviewing OSC:	l

# The subject matter of this report deals with the following Council Objectives

People – Supporting our residents to stay safe and well x
Place – A great place to live work and enjoy x
Resources – Enabling a resident –focused and resilient council x

#### **SUMMARY**

The Council's Corporate Plan was formally adopted in April 2024. A review of the metrics took place towards the end of the financial year and the updated corporate plan was agreed and formally adopted at cabinet in April 2025.

The Corporate Plan continues to be made up of the three Strategic Director Service plans and describes how we will deliver the vision under the following three themes:

- Supporting our residents to stay safe and well
- A great place to live work and enjoy
- Enabling a resident-focussed and resilient council

Under each theme sit a number of outcomes and key deliverables associated to the Key Performance Indicators (KPIs) that were agreed to be the most appropriate for measuring progress. These KPIs have been brought together into a Corporate Plan Performance Report, which provides an overview of the Council's performance. The report is presented in PowerBI and highlights good performance and potential areas for improvement.

The Overall KPI status page identifies where the Council is performing well (Green) and not so well (Amber and Red). KPIs which are narrative only, or for which it is not appropriate to set a target, are shown in Blue. RAG ratings for 2025/26 are as follows:

- Red = Below target
- Amber = Below target but within target tolerance
- Green = On or above target

Also included in the Power-BI report are Direction of Travel (long-term and short-term), which compares:

- Short-term performance with the previous quarter (Quarter 4 2024/25)
- Long-term performance with the same time the previous year (Quarter 1 2024/25, where available)

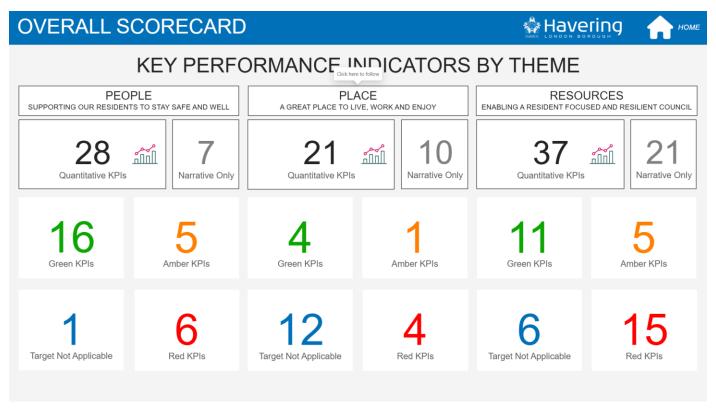
Please note the green arrow shows if  $(\uparrow)$  higher performance is better or  $(\lor)$  lower performance is better.

#### RECOMMENDATIONS

Members are asked to consider all indicators (especially the red indicators highlighted within the body of this report) and note the levels of performance set out in the power-bi report.

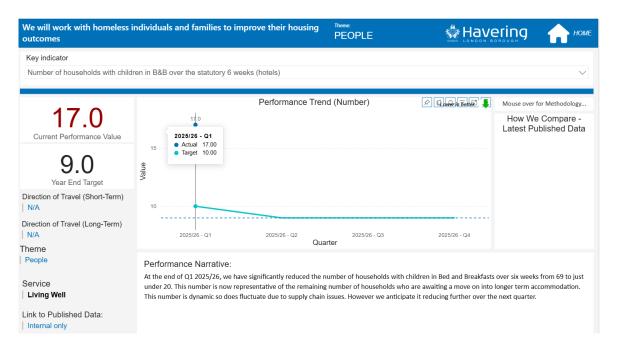
## **REPORT DETAIL**

#### Quarter 1 2025/26 RAG Summary

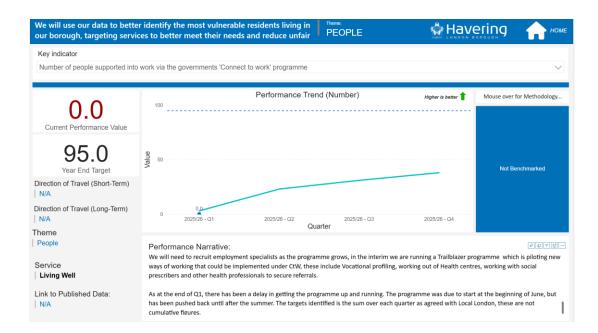


- 1. As at the end of Q1 2025/26, **124** Corporate Performance Indicators have been measured.
- 2. Of these, **57** are either narrative only (38) or are KPIS for which a target is not applicable (19). The remaining **67** have been given a RAG status outlined below:
  - a. 31 (46.3%) have a RAG status of Green.
  - b. 11 (16.4%) have a RAG status of Amber.
  - c. **25 (37.3%)** have a RAG status of **Red**.
    - Of these, 13 (52%) are annual indicators.
    - 4 of these are Indicators which are for 'Percentage of staff achieving performing well or better' in their PDRs, broken down by Directorate (People, Place, Resources and Communication & Engagement), which the system is unable to collect at this time.
- 3. A full breakdown of the report is available in Power BI and can be viewed using this link.
- 4. As requested at Scrutiny on 22<sup>nd</sup> October 2024, we have continued to provide a screenshot of each of the Red RAG rated indicators, below, for cabinet's information. Please note that annual indicators have been separated out. Please be aware that not all the commentary can be included in the screen shots provided within the report, so in order to read the full performance narrative, please do visit the Power-bi report using the link above.
- 5. We have continued to provide additional commentary within the body of this report on those red RAG rated indicators, highlighting why the indicator is red and plans on how to improve performance, as previously requested.

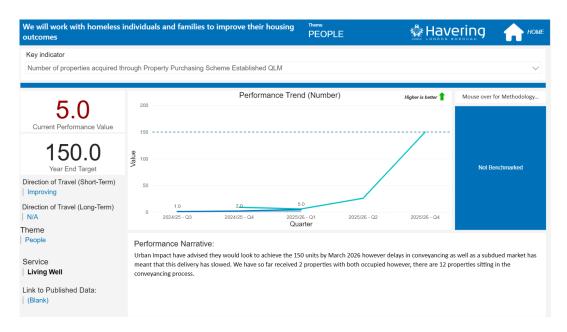
Theme	Key indicator	Current RAG	Data Type	Polarity	Current Performance	Current Target
People	Number of households with children in B&B over the statutory 6 weeks (hotels)	Red	Number	Lower is better	17.0	10.0
People	Number of people supported into work via the governments 'Connect to work' programme	Red	Number	Higher is better	0.0	3.0
People	Number of properties acquired through Property Purchasing Scheme Established QLM	Red	Number	Higher is better	5.0	6.0
People	Percentage of children in care placed within 20 miles of where they used to live	Red	Percentage	Higher is better	71.0	85.0
People	Percentage of children receiving a 2-2.5 year development check	Red	Percentage	Higher is better	81.2	95.0
People	Percentage of people over the age of 65 who have been diagnosed with dementia in each counting year (April to March)	Red	Percentage	Higher is better	55.4	67.0
Places	Number of publicly accessible EV charging points (Installed)	Red	Number	Higher is better	61.0	117.0
Places	Percentage of residents using sustainable modes of transport (cycling, walking, public transport)	Red	Percentage	Higher is better	48.0	50.0
Places	Replace CCTV Cameras with digital replacement by the end of March 2026	Red	Number	Higher is better	0.0	95.0
Places	The number of under-age sales operations	Red	Number	Higher is better	1.0	2.5
Resources	Improved satisfaction score as we roll out improvements that are aligned with the Customer Services Strategy	Red	Number	Higher is better	47.0	57.0
Resources	LXP Framework - Ensuring at least 80% participation in the Corporate Mandatory training programs	Red	Percentage	Higher is better	23.5	90.0
Resources	Percentage of PDR's Completed (People)	Red	Percentage	Higher is better	75.0	90.0
Resources	Percentage of PDR's Completed (Place)	Red	Percentage	Higher is better	87.0	90.0
Resources	Percentage of PDR's Completed (Resources)	Red	Percentage	Higher is better	88.0	90.0
Resources	Percentage of staff achieving 'Performing well or better (Communication and Engagement)	Red	Percentage	Higher is better		80.0
Resources	Percentage of staff achieving 'Performing well or better (People)	Red	Percentage	Higher is better		80.0
Resources	Percentage of staff achieving 'Performing well or better (Place)	Red	Percentage	Higher is better		80.0
Resources	Percentage of staff achieving 'Performing well or better (Resources)	Red	Percentage	Higher is better		80.0
Resources	The amount of Apprenticeship Levy spent (£)	Red	Money	Higher is better	153,221.9	1222801.0
Resources	The average call abandoned rate for our Customer Contact Centre (%) Vs the number of calls received	Red	Percentage	Lower is better	17.0	10.0
Resources	The average call waiting time for our Customer Contact Centre (seconds)	Red	Number	Lower is better	466.0	210.0
Resources	The percentage of information requests closed within target - EIR	Red	Percentage	Higher is better	73.0	90.0
Resources	The percentage of information requests closed within target - FOI	Red	Percentage	Higher is better	67.0	90.0
Resources	The percentage of information requests closed within target - SAR's	Red	Percentage	Higher is better	71.0	90.0



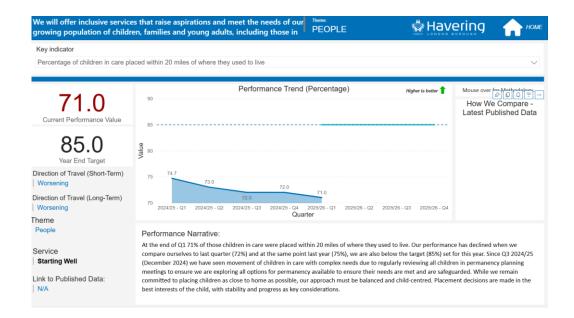
Although we have reduced the number of households with children in Bed and breakfasts over 6 weeks from 69 down to 17, we were still underperforming against the 9 target that we set ourselves at the end of Q1. This was due to supply chain issues which means that this number may fluctuate over the year, however having looked at the data in the middle of August we are down to 2 households with children in B&B over the statutory 6 weeks, so should achieve the target for Q2 reporting.



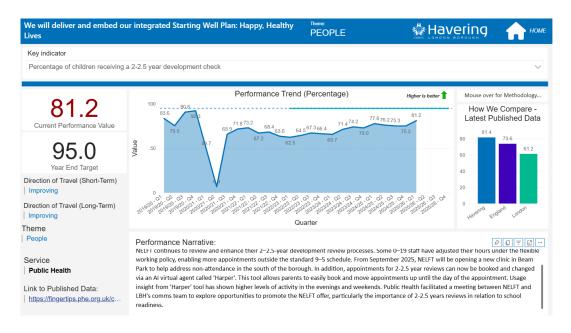
The programme was due to start in June 2025, but there has been a delay in getting the programme up and running, meaning that this will now not start until after the summer. Once it is launched there is a delivery plan which will cover the activities to be undertaken in order to support residents. In the meantime we are running an interim 'Trailblazer' piloting new ways of working that could be implemented this should help us see some improvement in performance.



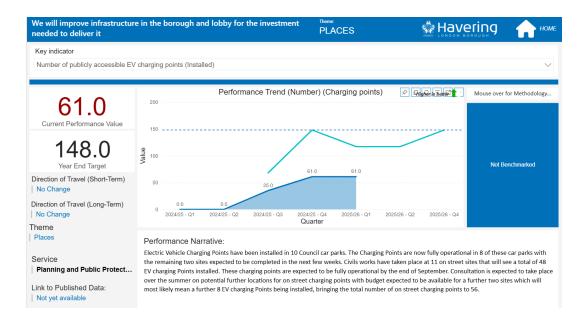
Although this is showing as a red indicator, this is because we have set ourselves a 150 unit target by the end of Q4 2025/26. We were only slightly behind the Q1 target of 6 and have a further 12 already sitting in the conveyancing process for Q2.



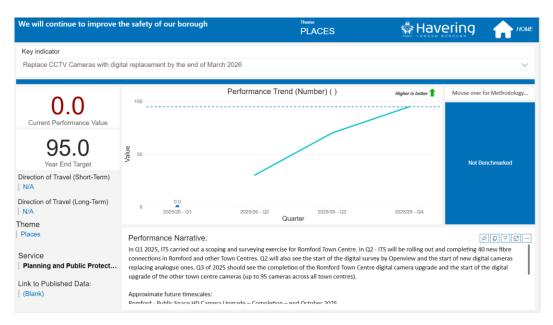
As the chart shows, the performance has slowly been declining over the last year. We started to see some movement of children in care with complex needs from December 2024, which has affected our performance. We are committed to placing children as close to home as possible, as our approach is based on the interest of the child with stability and progress as key considerations.



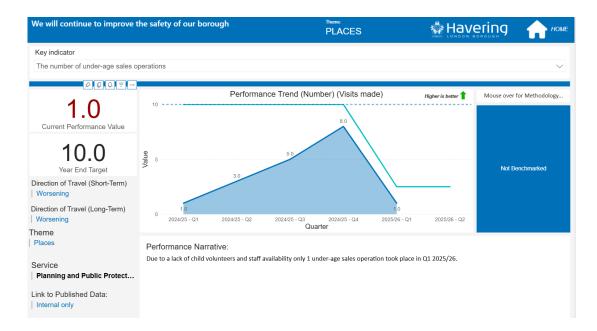
As you can see from the chart we have seen an improvement in performance when compared to last quarter, this is due to the fact that NELFT are continuing to review and enhance their 2-2.5 year development process including some staff adjusting their hours under the flexible working policy to allow more appointments outside the standard 9-5 schedule, and the introduction of the online booking and changing/cancelling AI system (Harper). A new clinic will also be opening in Beam Park to address the non-attendance in the south of the borough. We hope this improvement trend continues.



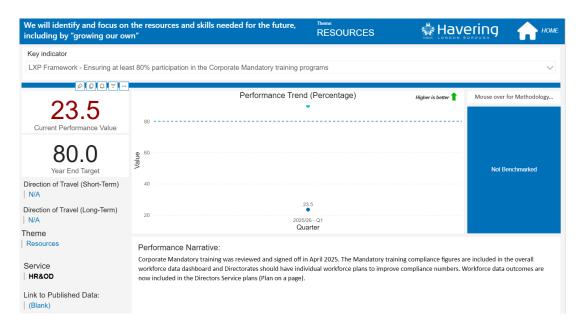
Although this is showing as a Red indicator, this target it to be hit by the end of the project (November 2025). We have already installed 61 charging points, across 10 Council car parks, 8 of these are now fully operational with the remaining 2 sites expected to be commissioned by the end of August. There are a further 48 charging points that are currently being installed in on street locations across the borough which should be operational by the end of September. Public consultations are expected over the autumn on potential further locations for on street charging points, hopefully for a further 8 points being installed later in the autumn bringing this up to 117.



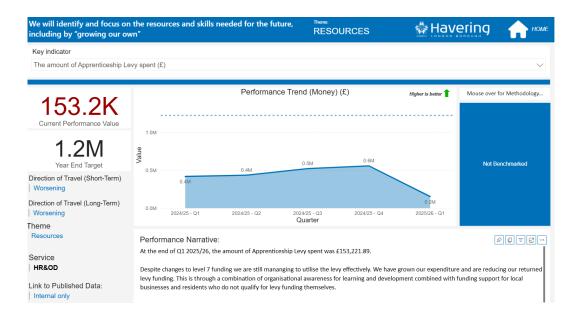
Replacing CCTV cameras with digital replacements is part of a wider project which involves moving the CCTV team out of Mercury house and into their new control room. The delay in the move has had a knock on effect meaning we didn't install any digital CCTV replacements in Q1. However, we used this time to scope and survey Romford Town Centre and installing the required infrastructure across the whole borough to prepare for the installs. We have now set quarterly targets in order to hit out annual target of 95 CCTV replacements by the end of March 2026, and now that the infrastructure is in place we envision rolling out and completing 40 new fibre connections in Q2, which is above the 30 target set for next quarter.



Although this indicator is showing as Red, this is because we have set a year-end target of 10. However we did miss the 2.5 Q1 target we set ourselves to, this would have been within the target tolerance. As you can see from the chart last year, performance improves over the year and we envision we will meet our target at the end of Q4.

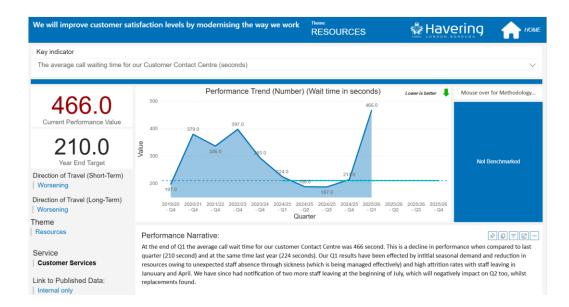


The mandatory training compliance figures are included in the workforce dashboard which is provided to all Directorates. 80% is the year-end target so there is enough time for officers to complete their mandatory training.



As at the end of June 2025, we had spent £153,221.89 since April 2025. We will continue to optimise the apprenticeship levy spend, encouraging Havering to support apprenticeships and invest in employee training and development. We will continue to utilise these funds to address skill gaps, improve workforce productivity and optimise growing our own skilled and adaptable workforce for the future.

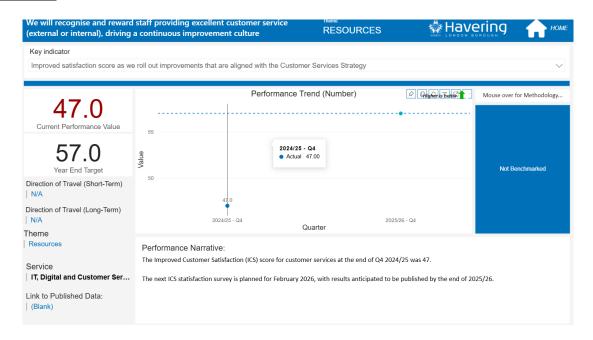




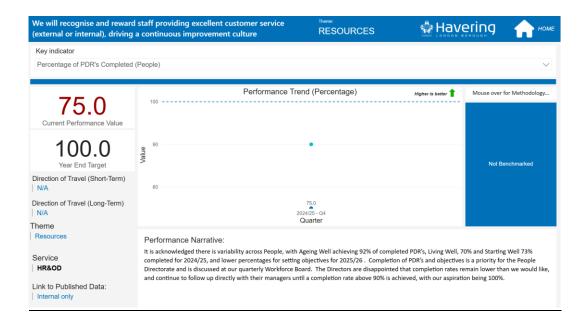
We have experienced unusually high wit times and abandon calls to the contact centre in the past months. This is due to a number of compounding factors, including the three long term absences, and high attrition rates this year.

We are managing these staffing issue and also looking at ways to safeguard the service further. For example: As part of our review into call centre technology, we are undertaking a trial of an AI Bot to act as an advance IVR (Interactive Voice Response). The trial will only be open to council offers and members to test how well their request is handled without the need to transfer to a contact centre operative. Bradford Council implemented this solution last year and saw a reduction of 45% of calls needing to go to a human. We will feedback on the success of the trial and future steps when after the trial finishes at the end of September.

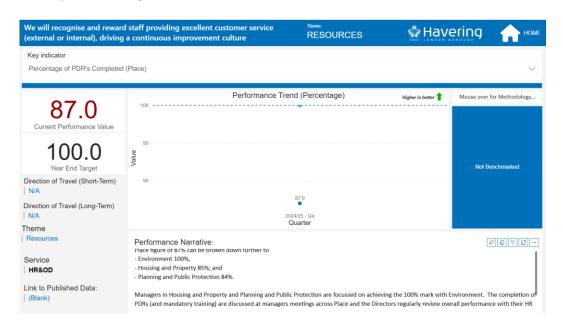
## **Annual Indicators**



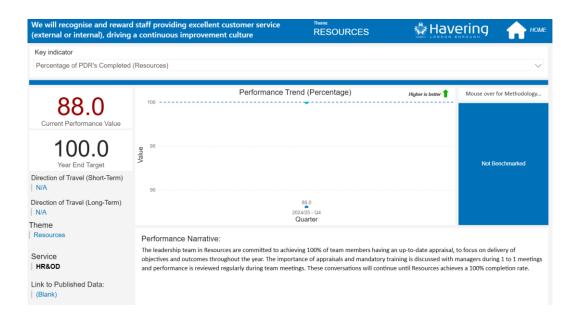
The Improved Customer Satisfaction (ICS) score was completed at the end of Q4 2024/25. We used this result to set the target for this year. We are envisioning to complete the next survey in February 2026 so we can provide our updated ICS score by the end of the financial year.



There is variability across People, with Ageing Well achieving 92% of completed PDR's, Living Well, 70% and Starting Well 73% completed for 2024/25. Completion of PDR's and objectives is a priority for the People Directorate and is discussed at our quarterly Workforce Board. The Directors are disappointed that completion rates remain lower than we would like, and continue to follow up directly with their managers until a completion rate above 90% is achieved, with our aspiration being 100%.

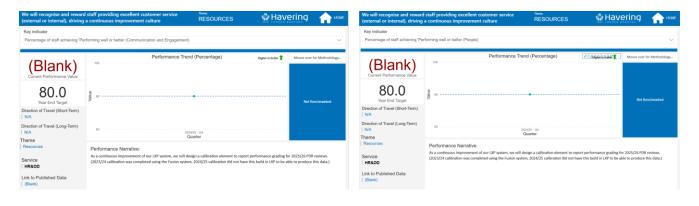


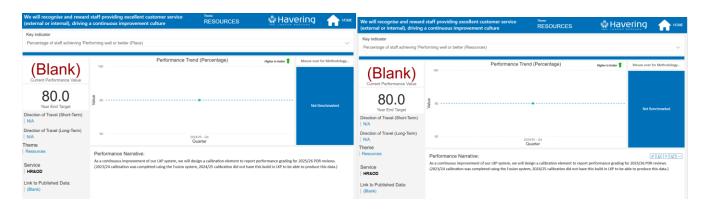
Although 100% of Environment completed their PDRs, overall Place performance was bought down by the 85% Housing and Property and 84% Planning and public protection. Managers in both of these areas are focused on achieving 100% this year. Completion of PDRs are discussed regularly at managers meetings and Directors regularly review their overall performance with the help of their HR business partner.



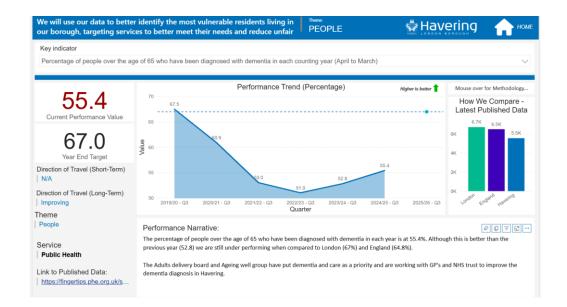
Resources performance is made up of 8 areas. Although Strategic HR&OD and Finance completed 100% performance was reduced by the other 6 areas (Pubic Health (94%) Customer Services Transformation & IT (92%) Partnership Impact and Delivery (85%) Exchequer and Transactional Services (78%) Technology & Innovation (71%) and Legal & Governance (47%)).

The leadership team are committed to achieving 100% PDR's, to focus on delivery of objectives and outcomes throughout the year. Conversations will continue with managers until Resources achieve a 100% completion rate.

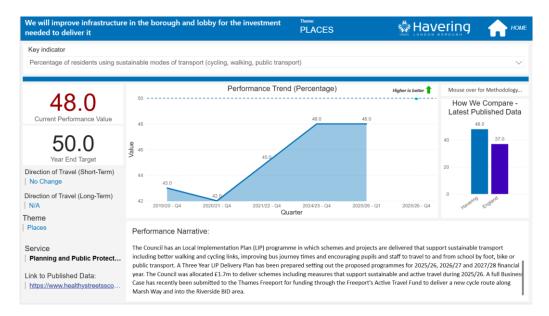




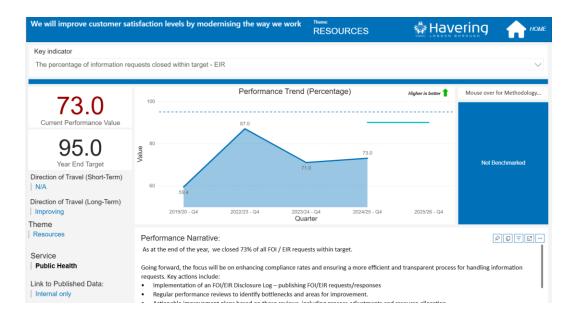
The four indicators that relate to the percentage of staff achieving 'performing well or better' in their PDRs are all Red RAG rated. This is because we have recently moved over to the new LXP system to record the PDR's on and as a continuous improvement of the system a calibration element to report performance grading for 2025/26 is being designed.



The adult delivery board and Ageing well group have put dementia and care as a priority and are working with GPs and NHS trust to improve the dementia diagnosis in Havering. This will help us with our performance and achieving the 67% end of year performance.

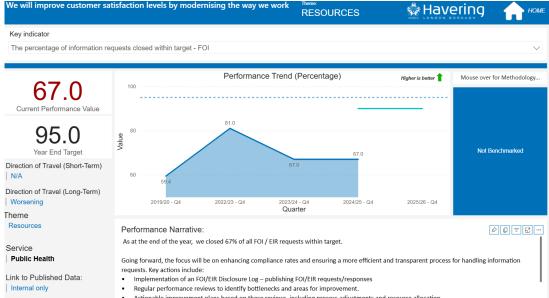


Although we are showing as red, we are only 2 percentage points below the 50% target. An Active travel strategy has been drafted which is earmarked to go live in October following Cabinet approval and a Local implementation Plan (LIP) programme both of which support sustainable transport including better walking and cycling, which is envisioned will improve performance.



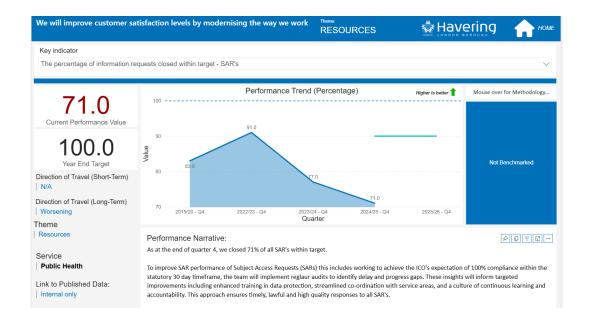
Although we have seen an improvement in performance from 2023/24 to 2024/25 the performance levels indicate more work is needed.

Going forward, by addressing the key areas of underperformance, we can enhance our compliance rates and ensure a more efficient and transparent process for handling requests. Conducting regular reviews and audits of EIR's will help identify discrepancies and areas for improvement in order to make the necessary adjustments to the process, ensuring we meet our compliance goals efficiently and effectively.



We have not seen any change in performance from 2023/24 to 2024/25 and the current performance levels indicate more work is needed.

Going forward, by addressing the key areas of underperformance, we can enhance our compliance rates and ensure a more efficient and transparent process for handling requests. Conducting regular reviews and audits of FOI's will help identify discrepancies and areas for improvement in order to make the necessary adjustments to the process, ensuring we meet our compliance goals efficiently and effectively.



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Going forward, by addressing the key areas of underperformance, we can enhance our compliance rates and ensure a more efficient and transparent process for handling requests. Conducting regular reviews and audits of SAR's will help identify discrepancies and areas for improvement in order to make the necessary adjustments to the process, ensuring we meet our compliance goals efficiently and effectively.

#### **REASONS AND OPTIONS**

**Reasons for the decision:** To provide Cabinet Members with an update on the Council's performance against each of the strategic goals within the Corporate Plan.

**Other options considered:** The option of not reporting was quickly dismissed as robust performance management underpins the Council's commitment to make informed, evidence-based decisions, and to be open and transparent with our residents, staff and partners.

#### **IMPLICATIONS AND RISKS**

#### Financial implications and risks:

There are no direct financial implications directly arising from the recommendations in this report.

Adverse performance against some Corporate Performance Indicators may have financial implications for the Council, particularly where targets are explicitly linked with particular funding streams. Conversely, correcting poor performance can require reallocation of resources. The funding available to deliver targets is reviewed regularly as part of the Council's ongoing MTFS and budget monitoring processes.

## Legal implications and risks:

There are no direct legal implications arising from the recommendations in this report. Whilst reporting on performance is not a statutory requirement, it is considered best practice to review the Council's progress against the Corporate Plan Objectives and is an indicator of good paddle 23d efficiency.

#### **Human Resources implications and risks:**

There are no major direct HR implications or risks from this report. Any HR issues which occur will be managed in accordance with the Council's HR policies and procedures and any change processes that are required will be managed in accordance with both statutory requirements and the Council's Organisational Change Policy and Procedure and associated guidance.

### **Equalities implications and risks:**

The Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010 requires the Council, when exercising its functions, to have due regard to:

- (i) the need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (ii) the need to advance equality of opportunity between persons who share protected characteristics and those who do not, and;
- (iii) foster good relations between those who have protected characteristics and those who do not.

Note: 'Protected characteristics' are: age, sex, race, disability, sexual orientation, marriage and civil partnerships, religion or belief, pregnancy and maternity and gender reassignment.

The Council is committed to all of the above in the provision, procurement and commissioning of its services, and the employment of its workforce. In addition, the Council is also committed to improving the quality of life and wellbeing for all Havering residents in respect of socio-economics and health determinants.

Equality impact assessments are systematically carried out for any services, projects or other schemes that have the potential to impact on communities and / or staff on the grounds of particular protected characteristics or socioeconomic disadvantage.

Equalities assessment is normally required for significant impacts upon ANY of the "protected characteristics". As this is a report pulls together the work that is already being completed or due to start, an assessment is not required.

## **Health and Wellbeing implications and Risks**

Under the Health and Social Care Act 2012 the Council is responsible for improving and protecting the health and wellbeing of local residents. Havering Council is committed to improving the health and wellbeing of all residents.

There are no health and wellbeing implications arising from the proposed decision to approve and publish this report.

#### **ENVIRONMENTAL AND CLIMATE CHANGE IMPLICATIONS AND RISKS**

The Council has committed to taking action towards the organisation and the borough becoming carbon neutral by 2040.

The table below gives the carbon footprint of activities associated with the publication of the corporate performance indicators:

Activity	Carbon footprint
Production of 1kg paper	1kg CO <sub>2</sub>
Production of 1 A4 sheet paper	5g CO <sub>2</sub>
Laser printing	10 pages per minute = 10.27g CO <sub>2</sub>
One internet search	0.2g CO <sub>2</sub>
Average website page view	1.8g CO <sub>2</sub>

Printing a single report to include all 124 corporate performance indicators would have a carbon footprint of approximately 747.35g  $CO_2$ . For all nine cabinet members this would equate to just over 6.7kg  $CO_2$  per quarter, or 26.9kg  $CO_2$  per year. Printing this 17 page report will equate to 102.459g  $CO_2$  per member (approximately 922.131g  $CO_2$  for all nine cabinet members)

Publishing the corporate performance indicators on the Council website would have a lower carbon footprint of approximately  $2g CO_2$ . For all nine cabinet members this would equate to  $18g CO_2$  per quarter, or  $72g CO_2$  per year.

No significant detrimental climate change implications or risks are expected as a direct outcome of this report, however it is recommended that printing is kept to a minimum to reduce organisational  $CO_2$  emissions.

**BACKGROUND PAPERS** 

The Corporate Plan 2025-2027 is available to view using the link below: <a href="https://issuu.com/haveringcouncil/docs/6609">https://issuu.com/haveringcouncil/docs/6609</a> vision for havering v9





CABINET 17 September 2025

Subject Heading: Launders Lane (Arnold's Field)

Cabinet Member: Cllr. Ray Morgon, Leader of the Council

ELT Lead: Helen Oakerbee, Director of Planning and Public Protection

Trotection

Report Author and contact details:

Policy context: Public Protection and Public Health.

Frequent, ongoing fires at the privately owned Arnold's Field cause smoke/pollution affecting the health and quality of life of local residents.

Financial summary:

The Council has incurred overall direct and indirect costs in responding to matters/ concerns

at Arnold's Field – £949K to March 2025, estimated £604K in 2025/26, plus further in

Ron Belgrave ron.belgrave@havering.gov.uk

2026/27 onwards.

Subject to decisions made on the status of the land and any works in default, there may be significant additional costs in the future.

Is this a Key Decision?

No.

When should this matter be

reviewed?

November 2026

Reviewing OSC:

Place Overview & Scrutiny Committee

People Overview & Scrutiny Committee

This subject matter of this report deals with the following Council Objectives:

People – Supporting our residents to stay safe and well.

Place – A great place to live, work and enjoy.

Resources – Enabling a resident-focused and resilient Council.

### MOTION RECEIVED

### Motion 23/07/25

The following motion (as amended) was agreed at Full Council on 23<sup>rd</sup> July 2025:

"Given the significance and impact on residents who live near Launders Lane, together with the impact on the general environment and the outcome of the recent judicial review, this Council calls for a report to be presented to Cabinet at its meeting in September 2025, of how the administration plans to rectify the situation in Launders Lane.

Such a report should include amongst other items, an issue log, risk analysis, costings, communication plan, key stakeholder analysis, key milestones and a detailed action plan with associated timescales. This report to be in line with good project management practice."

#### REPORT SUMMARY

# **Summary**

In response to the motion agreed by Full Council, this report describes the history of Arnold's Field; the investigations initiated by the Council in response to the fires on the site; and proposed options to stop the fires currently under consideration.

The Council acknowledges and understands the concerns from residents and recognises that the volume of fires being experienced, having to close their windows (due to the smoke) for extended periods of time and having to lose use of their gardens and local parks in the summers is not acceptable. The Council also recognises that the recurrent fires have an impact on the physical and mental health of local residents.

The Council continues to do all it can to find a solution to stop the fires (and associated smoke) and to ensure that those legally responsible for resolving the situation do so as quickly as possible. However, the situation remains complex.

Arnold's Field on Launders Lane, Rainham, RM13 9FL (the "Site") is privately owned and, between circa 2002-2014, the site was subject to illegal activities, including significant fly tipping, firearms storage and drug cultivation. The volume of illegal waste dumped, combined with the Site not being managed in the manner of an authorised landfill, is the root cause of the present ongoing

fires and smoke. However, visible fires did not become a significant annual occurrence at the Site until the summer of 2019.

From 2004 to 2018, a range of enforcement action was taken in relation to the site by the Council, Environment Agency and the Metropolitan Police. This included the serving of Planning Enforcement and Stop Notices and with individuals being prosecuted and sentenced to prison. Further enforcement action was taken by the Council in 2024 with the serving of an Abatement Notice and a Community Protection Warning on the current landowner.

Between 2022 and 2025, the Council also carried out air quality monitoring, commissioned an intrusive soil investigation, arranged testing of the watercourse, sampled for asbestos in the air, analysed health impact data and has explored options for stopping the fires. Discussions have also been held with expert/scientific advisers, national agencies, the landowner, local residents, the local MP, the Greater London Authority and the London Fire Brigade.

Following analysis of the air quality monitoring results, officers concluded that pollution levels, as a result of the Site, had not breached the World Health Organisation's Air Quality guideline values, nor the UK's current legal requirements regarding air quality. Equally, officers concluded that these limits were not helpful in assessing the impact of the fires on the health of residents living around Arnold's Field.

Although initial appearances suggested that the fires originated at the surface as a result of human action (eg. discarded glass or arson), officers latterly came to the view that the vast majority of the more recent fires start in materials underground and that the most effective means of stopping these "subterranean fires" (technically smouldering hotspots underground) is to prevent oxygen from reaching below the surface.

Following the judicial review ruling in June 2025, the Council has continued to carefully consider the available information, data and evidence and is in the process of making a new decision on whether or not the site should be determined as "Contaminated Land" under the Environmental Protection Act 1990.

If the Site is formally designated as "Contaminated Land", the Council would be required to enter further discussions with the landowner prior to the service of a Remediation Notice to address significant contaminant linkages. If the Site does not meet the threshold for designation as "Contaminated Land", the Council will serve an Abatement Notice on the landowner to abate the nuisance from smoke and to take the necessary steps to stop the fires.

Any substantial works to stop the fires may take 3-7 years but it may be possible to achieve an effective (albeit interim) stop to the fires within 6-12 months.

### RECOMMENDATIONS

Cabinet Members are asked to:

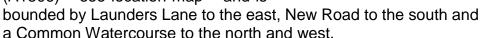
- Note the report in general.
- Note, in particular, the actions taken to date and possible future actions.
- Note, in particular, the costs to the Council to date and potential future costs/risks.

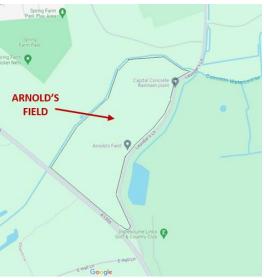
### REPORT DETAIL

# 1. Background

## **Location**

- 1.1 The Site at Arnold's Field, Launders Lane, Rainham, RM13 9FL has become known in recent years for repeated fires, particularly during warmer weather.
- 1.2 The smoke arising from these fires impacts on the quality of life of the local Rainham residents and concerns regarding the effect on their health have also been raised.
- 1.3 The site is located at the junction of Launders Lane and New Road (A1306) see location map and is





# **General History**

- 1.4 A list of key dates in relation to the history of the site is given in Appendix 1.
- 1.5 The site, within the Metropolitan Green Belt, is privately owned but has had a series of different private owners over the years with the current ownership from August 2017. The Site was previously a legal landfill (1960s/70s) and it is understood that the landfill was

- managed and "sealed" at ground level (in line with the practices/ standards at the time) at the end of its period of lawful operation.
- In 1999/2000, the Council granted planning permission for the importation of inert waste and soils initially for agricultural purposes then as community woodland. However, over the subsequent fifteen years (at different points), a significant excess of material (a mixture of industrial, commercial and household waste apparently including "non-inert" waste) was deposited. It is unclear whether or not this was done with the knowledge of all the landowners over that period of time. That material was also not properly compacted thereby allowing decomposition of the waste in a manner which leads to combustion (and fires/smoke) in certain circumstances. It is understood that material was dumped at the site up to around 2014 (when vehicular access was ceased).

## **Public Authority Enforcement**

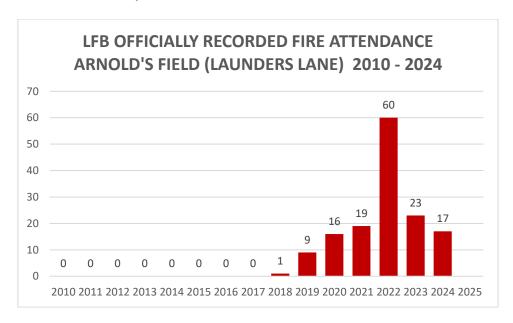
- 1.7 The Environment Agency (EA) is the authority responsible, from 1996, for prosecuting unlawful dumping (fly tipping) of the magnitude experienced at Arnold's Field.
- 1.8 From 2003 to 2018, enforcement action was taken in relation to the site by relevant public authorities, including the Council, the EA and the Metropolitan Police (MPS).
- 1.9 The Council investigated the extent of excess material brought onto the Site in 2003, issued Planning Enforcement and Stop Notices in 2004 (upheld by the Planning Inspectorate, on appeal, in 2005) and explored further legal action (under the planning regime) in 2010.
- 1.10 Criminal prosecutions were also pursued by the MPS (2011) for drugs and firearms offences and the EA (2017-19) for fly tipping offences resulting in six figure fines and prison terms of up to twelve years.
- 1.11 There was additional fly tipping from 2011 until the main gate was installed in 2014. However, it was not feasible for the Council to pursue enforcement action against the landowner during the period after 2011 as he was in prison for some years, there was no further major dumping after 2014 and the Site was then sold in 2017.
- 1.12 There was no further bulk dumping after 2014 but, due to the smoke from the fires, the Council then issued, in April 2024, a Statutory Nuisance Abatement Notice and a Community Protection Warning to the current landowner. The Abatement Notice was subsequently withdrawn in September 2024 and a requirement made that the landowner would submit clear actions (to a timescale) to stop the fires at the site. Those timescales were not met but it was decided to await the outcome of the judicial review which had been

commenced by that time (see paragraph 2.24 below and onwards) before pursuing further action.

### 2. Council Action

## Fire Data

- 2.1 Post pandemic and following the steep rise in the number of reported fires in 2022, the Council embarked on a process to understand the cause of the fires and the impact on the local community.
- 2.2 Local residents have said that fires had been happening at the site for 20/25 years but London Fire Brigade data suggest that regular and repeated fires began in the summer of 2019. However, it is noted that LFB might attend the Site in response to smoke or smouldering but may not record that attendance as a "fire".
- 2.3 In addition, the 2012 Jacobs Site Investigation Report (commissioned by the Environment Agency following an EA site visit in August 2011) does not mention fires, smoke or charring at all but does note that excavated waste was "frequently observed to be warm and emitting vapour, suggesting decomposition and the production of landfill-type gases" and noted that "snow melt frequently occurred ... suggesting decomposed waste was warming the overlying ground". The EA, in commissioning the investigation, did not identify that there were active fires at the Site.



2.4 Fire incident data from the London Fire Brigade (LFB) – from 2010 onwards – show no officially recorded fires at the Site prior to 2018. The fires were normally in the summer period (peaking in the exceptionally hot temperatures of 2022) with notable numbers each year from 2019. However, fire crews do attend on a greater number

- of individual occasions responding to "smoke only" calls and managing "controlled burns" (ongoing fires).
- 2.5 With very few fires reported (officially recorded as primary or secondary fires by LFB) from the site prior to 2019 (see table above), it was only when, between 2019 and 2022, the annual number of fires began to rise (in line with increasing summer temperatures) that a pattern started to emerge and a clear problem was recognised.
- 2.6 It should also be noted that there were not many formal complaints made to the Council about fires at Arnold's Field in that period. Records indicate that there was 1 complaint made in 2019, 6 in 2020, and 3 in 2021. However, 35 complaints were received in 2022 which was also when the Wennington fire occurred and there was an increase in the number of wildfires being dealt with by LFB across the capital.
- 2.7 This uptick in reported fires prompted the Council to start its investigations around the Site.

## **Scientific Study**

- 2.8 The Council has worked and engaged with a wide range of partner agencies (see Appendix 2) and has taken a significant amount of action and expended a considerable amount of financial and human resource in seeking to address the problem. These actions have included:
  - air quality monitoring
  - investigating and testing the soil
  - investigating and testing ground gases and ground water
  - initiating the testing of the watercourse
  - investigating and testing for asbestos in the air
  - requesting, compiling and analysing health impact data (using NHS information)
  - liaising with landowner and fire brigade to minimise the impact of fires (by improving fire-fighting access to the site etc.)
  - liaising with residents both in a larger forum and in smaller 1:1 meetings, to hear their concerns, share findings and inform further action
- A key early step was the establishment of a Technical Sub-Group to bring together experts in the fields of air quality and public health (amongst others) in order to advise on the design of a health risk assessment and the collation/interpretation of data and in order to identify the extent to which the fires contribute to the levels of air pollution (short/long term) and the evidence of direct impacts on the health of residents.

- 2.10 The Technical Sub-Group oversaw the air quality/pollution monitoring methodology, analysis, interpretation and reporting from the Imperial College Environmental Research Group (Imperial-ERG) (as part of the Breathe London project) and from the Transport Research Laboratory (TRL). All reports from Imperial-ERG and TRL have been published, their data discussed at the public meetings and are available on the Council's website.
- 2.11 The Council commissioned and supported the establishment of a ring of air quality monitoring nodes for PM<sub>2.5</sub> and NO<sub>2</sub>, through the Breathe London network, around the site. These "Clarity" nodes were installed primarily in nearby residential areas. Imperial-ERG assessed the data from the nodes. Their assessment concluded that, despite the frequent large but short-lived peaks of particulate air pollution, "there is no observable difference between the levels detected at monitoring around Arnold's Field and the immediate wider area, or across London" and that "there is no evidence that any UK limits are being broken currently". It is noteworthy that UK and international thresholds relate to longer time periods, the shortest of which is a daily (24 hour) limit.
- 2.12 The Council also commissioned a second contractor (TRL) to monitor the levels of specific pollutants - Volatile Organic Compounds (VOCs), Poly Aromatic Hydrocarbons (PAHs), Polychlorinated Biphenyls (PCBs) and Heavy Metals (Mercury and Lead). These were monitored through a ring of air quality 'Tenax' tubes and two static monitoring stations. The pollutants assessed were based on sector expertise and previous experience as to what compounds are likely to be produced by combustion at the site. Their assessment concluded that, based on annual averages, there are no exceedances of UK or World Health Organisation (WHO) thresholds (where they are available) and, for the compounds with no UK/WHO thresholds, comparisons were made with historical datasets. The Launders Lane sampling showed lower levels than the comparator datasets. These monitoring locations gave monthly averages of the pollutants being evaluated, and did not have the capacity for more granular analysis.
- 2.13 In 2023, the Council commissioned an intrusive investigation of the contents of the soil at the site including examination of underground gases and water/liquids. The analysis identified the presence of volatile organic compounds, methane and other gases. The report recommended that the site be secured to "prevent unauthorised access" and that the site be capped so as to prevent fires by "starving any combustible material of oxygen" underground.
- 2.14 In 2024, the Council commissioned an airborne asbestos study around Arnold's Field in Spring Farm Park and along the New Road to investigate the release of any asbestos fibres from the

- Site. During the study by the UKAS accredited consultant, there was smoke emanating from the site, however no asbestos fibres were detected within the samples collected.
- 2.15 In 2024, to reassure residents, the Council requested the National Disease Registration Service (NDRS) to analyse the rates of three cancer types potentially associated with exposure to air pollution (lung cancers, haematological cancers [such as leukaemia] and brain cancers), as well as mesothelioma (a type of cancer usually linked to asbestos exposure). The NDRS reported that cancer rates around Arnold's Field were not statistically different from the rest of the Borough.
- 2.16 In 2024, the landowner enhanced the security at the site with fencing and a secondary gate in the south-east corner. With unauthorised access prevented, the indications to officers were that the ongoing fires were therefore most likely as a result of subterranean activity (spontaneous combustion, with the presence of oxygen, of decomposed/degraded underground compounds) or grass fires igniting waste below the ground rather than human activity at the surface (eg. due to further fly-tipping or arson).
- In 2024, the Council concluded a study with guidance from 2.17 environmental epidemiologists at Imperial College – on the Acute Respiratory Health Impacts of Fires around the Site. This involved examining NHS healthcare data to identify any temporal relationship between occurrences of fires at the site and the use of healthcare services for respiratory symptoms/illness amongst residents living close to the site. The report found that there was a statistically significant increase in the number of patients with pre-existing longterm respiratory conditions (such as asthma and COPD) attending the GP surgery on the day of a fire attended by LFB. However, amongst the general population, no statistically significant impact of "fire days" on GP visits, prescriptions issued, A&E attendance or hospital admissions for respiratory illness/symptoms was shown. This was the case on the day of the fire as well as the cumulative three and seven day periods following a fire event. This is in line with international consensus that those with pre-existing respiratory health concerns are at increased risk of the effect of particulate matter/poor air quality.
- 2.18 In 2025, the Council received the results of an options appraisal exploring different methodologies to stop the fires by way of preventing oxygen transfer from the surface to underground waste. These methodologies have already been explored with the landowner through informal discussions and include a temporary solution (would take around six months to implement and would initially last for 1-3 years) and longer term "permanent" solutions (which could take 2-4 years to implement).

## **Health Impact**

- 2.19 In addition to the epidemiological studies mentioned above, residents report a wide range of physical symptoms and attribute a variety of health conditions (headaches, coughing, streaming eyes etc.) to 'toxic smoke' emanating from fires at Arnold's Field.
- 2.20 Residents also report mental health impacts and loss of amenity resulting from repeated fires (and repeated shelter indoors advice) meaning that they cannot use their gardens or ventilate their houses by opening windows and that the smell of smoke permeates their properties and belongings.
- 2.21 This evidence, although anecdotal, is frequent, received from several sources and consistent with elements of the scientific evidence base.

## "Contaminated Land" (EPA 1990)

- 2.22 Part 2A of the Environmental Protection Act 1990 governs the definition and designation of "contaminated land". Deciding that a site is "Contaminated Land" is a called a "determination" and the Government (through the Dept. of Environment, Food and Rural Affairs DEFRA) has issued Statutory Guidance to assist local authorities in their decision making.
- 2.23 In April 2024, the Council assessed the information available at the time and, following its understanding of the perspectives amongst professionals in the field, made the decision that the Site did not meet the requirements to meet the definition of Contaminated Land within the meaning of the Act. Following the expiration of the subsequent election period, the decision was made known publicly through the Launders Lane newsletter in mid-July 2024 with the Council also saying that, as further information became available, the decision would be reviewed.
- 2.24 In October 2024, a request for a judicial review (JR) of the Council's decision was lodged with the courts from an organisation (as claimant) called "Clear the Air in Havering". That JR was heard in the High Court in March 2025 and the judge issued their ruling in June 2025.
- 2.25 Although three of the five grounds of the JR were dismissed, the judge's ruling on the other two grounds was in effect that, in making its (first) decision, the Council should have waited for more data to be available (from the air quality monitoring) and should have considered whether airborne contamination (ie. smoke from the fires) was capable of giving rise to the land being "Contaminated Land" under the Act and Statutory Guidance.

- 2.26 In the period since July 2024, the Council has been collating and assessing additional relevant information but had awaited the outcome of the JR before proceeding with a new/second decision.
- 2.27 Following the JR ruling, officers are now reassessing the relevant information and finalising materials in order to be able to make a new Part 2A decision. Following the Council's determination, subsequent enforcement action whether through the Contaminated Land Remediation route or the Statutory Nuisance Abatement route is likely to follow to oblige the landowner to take steps to stop the fires at the Site.
- 2.28 It will be the responsibility of the landowner to decide on and implement the necessary lawful, suitable and effective measures to resolve the situation within the required reasonable timescale.
- 2.29 It should be noted that, whichever Part 2A decision the Council makes, the result could be subject to a further judicial review from an interested party or the previous JR claimant (if the decision is "not contaminated land") or an appeal by the landowner (if the decision is that the Site is designated as "contaminated land").
- 2.30 In addition, if the Part 2A decision is that the site is not identified as Contaminated Land, and a subsequent Abatement Notice is served, then (as was the position last year), the landowner may decide to appeal that notice as they did in 2024 (see below). This would mean that the notice is suspended until the appeal is heard by the courts, which could take several months.

### **Statutory Nuisance and Community Protection**

- 2.31 In April 2024, following the then decision that the Site was not "Contaminated Land" under the Act, officers considered what other steps could be taken to address the fires and the impact that the smoke was having on local residents.
- 2.32 Having considered the complaints received from residents, it was decided that a statutory nuisance was likely being caused by the smoke and was likely to recur. When the Council is satisfied that a statutory nuisance is occurring, or likely to be occurring, it is obliged to serve an Abatement Notice. Such a notice was served, in late April 2024, on the landowner requiring them to abate the nuisance by executing any necessary works or taking any steps needed to address the smoke.
- 2.33 It should be noted that an abatement notice cannot be served when a Site is designated as "Contaminated Land" if the nuisance is arising due to the contamination.
- 2.34 It was also decided that the landowner's lack of action, up to that

point, to curtail the fires was having a detrimental effect on the quality of life of others in the locality and causing an unreasonable burden on the London Fire Brigade. Consequently, a Community Protection Warning (CPW) was also served in late April 2024 on the landowner to prevent unauthorised access to the Site, to require the landowner to inform the Council how they would be preventing fires from occurring on the Site and to provide all reasonable assistance to the LFB to deal with any fires which did occur on the Site.

- 2.35 It is not possible to appeal against a CPW and the landowner did not carry out the actions in the timescales set out in that Warning. However, following a joint visit to the Site in September 2024 with the Council and LFB, he did later (November 2024) install a secure vehicular gate to prevent access through the south-east opening and created a hard standing inside so that fire engines could manoeuvre to fight the fires.
- 2.36 The landowner appealed against the Abatement Notice which suspended the requirements of the notice until the outcome of a court hearing. Having considered the grounds of the appeal and, following a series of positive meetings with the landowner which improved dialogue, officers decided to withdraw that Abatement Notice. Due to the public campaign around a judicial review already gaining ground, rather than issuing a further abatement notice, a letter was instead sent to the landowner in September 2024 setting out two key requirements.
- 2.37 Those two requirements were that the landowner should:
  - a) confirm, by 31<sup>st</sup> December 2024 (and to the Council's satisfaction), what substantive actions he would be taking to abate the smoke from the Site;
  - b) complete any works/actions by 30<sup>th</sup> April 2025.
- 2.38 Because the Council had not heard from the landowner or his agent by the end of 2024, a chasing letter was sent to the agent, who replied in February 2025 that they had written to the Council in December 2024 referencing the secure vehicular gate but not proposing any actions/works to stop the fires (other than their intended planning application to redevelop the Site). That letter was not received at the time it was first sent.
- 2.39 By the time of the second deadline (April 2025) no further proposal for works had been received.
- 2.40 In parallel, joint discussions had begun in February 2025 between the Fire Brigade, Council and landowner to produce a Memorandum of Understanding (MOU) principally to enhance fire-fighting at the Site. This MOU was finally agreed and went into official effect from July 2025.

2.41 In addition to the MOU discussions, informal meetings took place between the Council and the landowner in May and August 2025 where the Council outlined the possible steps that could follow the judicial review ruling – including the service of a new Abatement Notice.

## **Planning**

- 2.42 In October 2018, the landowner submitted a pre-application enquiry as to future use of land this was responded to by the Planning Dept. in December 2018. Following further communication in 2019 and 2020, the fee for a new pre-app meeting was paid in October 2021 and, since then, the landowner has engaged with the Local Planning Authority through seeking pre-application advice to develop the site as a depot.
- 2.43 Appropriate advice has been given in regard to the green belt status of the land and other relevant applicable planning policies that will need to be considered should a planning application be submitted.
- 2.44 The landowner has more recently (2025) commissioned planning consultants to advise on Environmental Impact Assessment (EIA) screening requirements and an ecologist to advise on biodiversity matters. Officers have requested further information in regard to EIA screening.
- 2.45 Due to the indicative size of the development being considered by the landowner, a significant amount of supporting material would likely be necessary to be submitted as part of any planning application. To date, officers have advised that they do not consider that there is a significantly strong enough case to justify a development of the size and nature currently suggested, but continue to feedback to the landowner. It should also be noted that, subject to the quantum of development proposed, the application may be referable to the Mayor of London who has powers to direct refusal of any application.
- 2.46 Nevertheless, it should be noted that the landowner maintains that the only feasible (affordable) means by which action could be taken to stop the fires at the site is through a grant of planning permission for development of the Site on a commercial basis to provide a plant hire depot. However, to date, he has not yet submitted a full planning application.

# 3 Approach to "Rectifying the Situation"

### Context

- 3.1 As detailed above (and in Appendix 2) the Council's activity in relation to the site prior to 2022 was primarily either around planning enforcement or in reference to prosecutions by the EA or MPS.
- 3.2 The Council's more comprehensive approach to its actions to "rectify the situation" began in 2022 and, since then, has broadly been in two phases:
  - Phase 1 Understanding Causes & Impacts
    - air quality monitoring
    - health impact analysis
    - land/soil investigations
    - water quality monitoring
    - asbestos monitoring
  - Phase 2 Identifying/Pursuing Solutions to Stop the Fires
    - security of site (extra gate/fencing)
    - explore options to prevent oxygen reaching underground waste
    - oblige landowner to take action to stop fires
- 3.3 To ensure the swiftest possible progress, some of the activity within individual phases was carried out concurrently and some elements in both phases were being conducted at the same time.
- 3.4 Having first prioritised checking and confirming the extent of any pollution and whether it breached the relevant health thresholds, the focus of attention moved from Phase 1 to Phase 2.
- 3.5 Initial explorations of the sources of combustion suggested a mix of fires that originated both at the surface and from underground. However, officers subsequently took the view that, whilst there were materials burning at the surface, the origins of those fires are more likely to have been subterranean. This was later reinforced when the number of fires and smoke incidents continued to occur at previous levels despite no new material entering the Site (due to enhanced security) and the previously existing material at the surface having largely already been burned.
- 3.6 Furthermore, with the improvements in security at the Site now making it inaccessible and in the light of public knowledge about the condition of the land, the likelihood of fires now being caused by human action (inadvertent or otherwise) is, in practice, negligible.
- 3.7 It should be noted that, whilst the term is used to illustrate the point, there are no "subterranean fires" because there are no flames underground. Technically, they are "hotspots" where the

- temperature of the waste rises because of oxygen ingress which allows aerobic degradation of the waste. If the rate is high enough, and the heat cannot escape, the waste starts to smoulder.
- 3.8 As "subterranean fires" (smouldering hotspots) still require air/oxygen to burn or smoulder, it was concluded that preventing the passage of oxygen from above ground to below ground is the most practical approach to inhibiting future combustion.
- 3.9 Therefore, in discussion with expert advisers, options around capping the site, and more novel approaches (including hydromulching and liquid clay injection) have been explored as possible means of preventing the passage of oxygen.

## **Recent Activity**

- 3.10 Over the past nine months, the focus of activity has been on addressing the issues raised by the judicial review about the first Contaminated Land decision, made under the provisions of Part 2A of the Environmental Protection Act 1990. This has been a resource intensive and time consuming process which has involved collating the necessary additional technical information (asbestos, respiratory health, air quality, and employing a specialist land quality consultant) and analysis to make a new Part 2A decision in tandem with considering further action that may be required (eg. serving a further abatement notice for statutory nuisance) and obtaining expert advice on the most effective means to stop the fires.
- 3.11 A Memorandum of Understanding was also developed between the London Fire Brigade, landowner and Council to improve fire-fighting abilities (ie. controlled LFB access into the Site) and to inform the Council when fires are taking place.
- 3.12 In light of the disappointing response from the landowner to the requirements set out by the Council around the withdrawal of the previous Abatement Notice, informal meetings have been held (May and August 2025) with the landowner to outline the actions that may now follow.
- 3.13 The landowner has indicated his primary preference to pursue his wish for redevelopment of the Site but, whilst the Council has provided comments on the documents submitted to date (a draft Environmental Impact Assessment and a list of Very Special Circumstances), a full planning application has still not been submitted.

### **Next Steps**

3.14 Once all available technical information has been collated and assessed, officers will make a decision – in accordance with the

- Contaminated Land Statutory Guidance on whether the site meets the thresholds for determination as "Contaminated Land" within the meaning of Part 2A of the Environmental Protection Act 1990.
- 3.15 If the decision is "yes", the Council would then need to have further discussions with the landowner before issuing a Remediation Notice (on them and on any other interested parties) to stop the "contaminant linkage".
- 3.16 Failure to comply with the requirements of any Remediation Notice can result in the prosecution (with a maximum unlimited fine plus a daily cost for failure) or an imposition of the Courts to comply with the notice. The Council can also carry out works in default for the compliance of the Remediation Notice, for which the costs can be recovered.
- 3.17 If the decision is "no", the Council would then be able to separately assess if a statutory nuisance is occurring and serve a new Abatement Notice on the landowner to stop the "statutory nuisance".
- 3.18 Failure to comply with the abatement notice can also result in prosecution (with unlimited fines), carrying out works in default to resolve the matter (with costs recharged).
- 3.19 Service of an Abatement Notice could be subject to an appeal by the landowner irrespective of the decision made by the Council which would delay any steps to remedy the situation at the Site.
- 3.20 Whichever Notice is served, the subsequent key milestones would be for the landowner to:
  - decide on which measures to use to stop the fires
    - including providing details of a full programme of works
  - achieve the necessary permissions/licences
  - carry out the works within an agreed timescale
- 3.21 It may be that some form of temporary measures (perhaps lasting one to five years) may be achievable to bring in a relatively quick (within one year) cessation or substantial reduction in the frequency of the fires pending action by the landowner to permanently prevent the fires.
- 3.22 Consequently, given the beneficial impact of the cessation of the fires in the shortest possible time span, consideration should be given to public authorities (for example, the Council, the Greater London Authority the Environment Agency and/or DEFRA) providing some level of financial support to the landowner for this specific purpose. Such financial support, if feasible, could be in the form of a grant, a loan or a charge on the property.

- 3.23 If the landowner does not enact a solution (temporary or permanent), the Council will then seek to enforce against them and/ or take action itself and seek recovery of payment from the landowner.
- 3.24 Nevertheless, it should clearly be noted that, whatever Part 2A decision is made or whichever Notice might be served, the onus will be on the landowner to take action to address the condition of the Site and stop the fires. His view currently appears to be that a planning application and subsequent development (which he estimates could take 7 years from the date of any final approvals).

# 4 Direct Costs to the Council (exc. Staffing)

- 4.1 Since 2022, the Council has incurred direct costs (to March 2025) of around £280K. The majority of those costs were in Public Health principally air quality monitoring/studies. However, in later years, costs have also been borne by the Public Protection Service in relation to exploring the options to prevent the fires, responding to legal action and receiving legal advice.
- 4.2 For 2025/26, initial costs of up to around £200K are currently expected. The majority of those costs will be in Public Protection principally legal costs associated with the Part 2A decision. There may also be additional costs associated with any further legal challenges (ie. pertaining to the new Part 2A decision or Abatement Notice).
- 4.3 For 2026/27 onwards, there will be further costs currently £15K annually (air quality monitoring) and perhaps an additional £60K annually for 24-hour "Statutory Nuisance Summer Cover" by suitably trained officers, overseen by Environmental Health. There may also be additional costs associated with any further legal challenges (ie. pertaining to the new Part 2A decision or Abatement Notice).
- 4.4 However, most significantly, if the landowner does not take the necessary steps to comply with the remediation or abatement notices (dependent on decisions outlined in the Next Steps section above) then the Council could exercise its powers to carry out "works in default". A desk study carried out by consultants commissioned by the Council has indicated that such costs could be around £4-10M for a permanent solution (soil capping the site) or around £300-500K for a temporary solution (polymer hydro-mulching).
- 4.5 An alternative for 2026/27 and 2027/28 could be that, as outlined above to facilitate a speedy (albeit interim) resolution, public authorities could consider providing financial support for the works by the private landowner to achieve a temporary solution to the fires. As such, the Council has embarked on discussions with the GLA and Environment Agency and intends to do similar with DEFRA.

This would be on the basis that responsibility for the Site lies with the landowner and any financial support may be in the form of a loan and/or a charge on the land. Once the Council has made its decision on the Part 2A determination, letters will be send to the agencies above setting out the position and "the ask".

# 5 Project Management

## **Discovery Stage**

- 5.1 The Council's activity in relation to responding to the issues at Arnold's Field could be described as being at the "discovery" stage which is often defined as the "crucial preliminary stage where a project's overall goals, requirements and feasibility are thoroughly investigated and defined before significant resources are committed".
- 5.2 The discovery stage also provides the opportunity to carry out an exploration of background issues to help filter and focus thinking to produce recommendations for moving forward. It therefore helps to set the foundation for the entire main project ahead.
- 5.3 The main project ahead would, in effect, be where the landowner is planning and executing the works. The Council, at that stage, would fulfil a monitoring role.

#### **Communications and Stakeholders**

- 5.4 Since 2022, the Council has developed arrangements for engaging and communicating with both residents and a variety of key stakeholders.
- 5.5 The arrangements for residents now include public meetings (occurring at least annually), occasional meetings between senior representatives of the Council and the local community grouping ("Residents Against Pollution" RAP) and an occasional as circumstances arise newsletter (thirteen editions since 2023).
- 5.6 The arrangements for key stakeholders include quarterly Partners' meetings and, in addition, there is frequent liaison by Council officers with LFB, RAP leaders and the landowner.
- 5.7 The Technical Subgroup also held standing monthly/six-weekly meetings up until December 2024 with an option to reconvene ad hoc if required.
- 5.8 There has been a great deal of media coverage on Launders Lane, from local and regional, to national and international media. As well as local media (Romford Recorder and The Havering Daily), the

- issue has been covered by outlets including BBC TV and Radio, ITV, Sky News, CNN and The Guardian.
- 5.9 Residents have also shared the impact on their lives through social media posts and comments, particularly in the 'Launders Lane CRISIS' Facebook group. This has allowed the Council the opportunity to further communicate what action has been taken as well as providing the Council a valuable method of understanding residents' concerns and sentiment.

## **Actions, Milestones and Potential Timescales**

- 5.10 On the basis that the "project" is at the discovery stage, the key high level milestones, past and future, in the timeline (including different potential paths) could be as outlined in the list below:
  - 2022 = air quality monitoring
  - 2023 = environmental assessment
  - 2024 = health research
  - 2025 = solutions study
  - 2026 = voluntary temporary solution
  - 2027 = enforced temporary solution
  - 2030 = enforced permanent solution (first work phases)
- 5.11 However, it should be noted that some external factors, such as legal challenge, landowner actions or Government participation, are outside the control of the Council and may have impacts on the possible timeline.
- 5.12 Following the "Contaminated Land" decision and the issuing of any Notices, the broad pathways ahead could be one of:
  - a) landowner voluntarily and promptly proceeds with a solution (either temporary or permanent)
  - b) landowner fails to comply with either Notice within the prescribed timescale, the Council pursues prosecution with a view to carrying out "works in default" for either a temporary or more permanent solution
  - c) landowner fails to comply with either Notice and goes into liquidation
- 5.13 With pathways A or B above, there would be a number of supporting actions required, such deciding on what type of solution to pursue, conducting any preliminary assessments, specifications and programming, confirming costings, pulling financial arrangements together, securing any required licences and permissions, procuring suitable contractors, managing and monitoring the works etc.
- 5.14 An overview of the key high level milestones delivered and planned are outlined in the table below.

5.15 Any detailed project planning would then take place once it is clear which project/pathway is being pursued.

DATE	ACTIVITY	LEAD	STATUS
2022- 2023	Install all air quality monitoring nodes.	Public Health	COMPLETE
2023	Install all air pollution monitoring stations.	Public Health	COMPLETE
2023- 2024	Research on health impacts.	Public Health	COMPLETE
2023- 2025	Assessment of soil, air, asbestos and water.	Public Protection	COMPLETE
2023- 2025	Research on air quality and air pollution.	Public Health	COMPLETE
2024- 2025	Study of options to stop oxygen to fires.	Public Protection	COMPLETE
Sept 2025	Second Part 2A "Contaminated Land" decision.	Public Protection	ON TARGET
Oct 2025	Issue Abatement Notice (as appropriate following Pt2A decision).	Public Protection	ON TARGET
Dec 2025	Issue Remediation Notice (as appropriate following Pt2A decision).	Public Protection	AFTER DISCUSSIONS

## **Projected Spend**

- 5.16 Although the site is privately owned, the Council has incurred costs
   in particular since 2022 associated with its Public Health and
  Public Protection (environmental health) statutory duties.
- 5.17 During the period from 2022 to March 2025, the Council incurred direct costs of £280K broken down as c£155K via Public Health (air quality monitoring, analysis and interpretation of impact on health of local residents) and c£120K via Public Protection (legal costs, soil/asbestos studies).
- 5.18 During 2025/26, initial direct costs of around £200K are expected the majority being legal costs (Public Protection) associated with the first (2024) judicial review, the second Part 2A decision and statutory nuisance enforcement.
- 5.19 If a judicial review is lodged against the new (second) Part 2A decision in 2025 then this would result in further legal costs of up to around £100K and perhaps further in 2026/27.
- 5.20 If an appeal is lodged against a Remediation Notice or Abatement Notice then this would result in further legal costs of up to around £20K in 2025/26.

- 5.21 If there is agreement to support works for a temporary solution to stop the fires at the Site then that could lead to costs of around £50K in 2025/26 (assessment, design and procurement) and up to around £250K in 2026/27 (works).
- There is also a commitment to the recurrent ongoing costs of air quality monitoring (PM<sub>2.5</sub> and NO<sub>2</sub>) around the site. From 2026/27 onwards, costs are anticipated of £12½K annually are anticipated (Public Health).
- 5.23 However, if (following a Notice) the landowner defaults on carrying out the necessary works to stop the fires (eg. capping the site to prevent combustion), then the Council may need (or decide) to step in to do the work. As any Notice is likely to allow one year for compliance before enforcement could begin, this would lead to costs anticipated to be incurred from 2026/27 onwards. Such works may require an initial spend of up to £50K to conduct detailed operational technical assessments and project planning, followed by either spend of around £450K for a temporary capping solution or spend of up to £5M-£10M for a permanent solution.
- The Council may consider joining with other public authorities to pool funding to help facilitate the quickest (but temporary) means of stopping the fires. This could mean costs to the Council of between £125K and £250K depending on the extent of participation by other authorities.
- 5.25 In addition to the above direct costs, the Council has also incurred "opportunity costs" in relation to staff time spent working on matters pertaining to Arnold's Field. See table below including projections for future costs.

Staff Time – Opportunity Costs:

£K 2022/ 23 to 2024/25	£K 2025/ 26	£K 2026/ 27	£K 2027/ 28 to 2032/33	TOTAL £K
£669K	£281K	£239K	£566K	£1,755K

5.26 These are primarily "opportunity" costs where existing staff have been diverted from their other work to focus on Arnold's Field – but do include some actual costs where temporary staff have had to be employed. This is estimated to be £950K to March 2026.

## **Summary of Potential Spend**

In summary, over the period 2022/23 to 2032/33, the Council could incur the following non-staffing costs:

- a) Landowner voluntarily enacts temporary solution (without public sector financial support) assuming subsequent planning permission granted for redevelopment
  - **£870,000**
- b) Landowner voluntarily enacts temporary solution (with Council financial support) – assuming subsequent planning permission granted for redevelopment
  - £1,170,000
- c) Council enforces (works in default) a temporary solution assuming subsequent planning permission granted for redevelopment
  - £1,920,000
- d) Council enforces (works in default) a permanent solution
  - £10.970.000
- 5.28 The above represents approximate projections for some scenarios and, given the large number of variables (such as future inflation, potential legal challenges or operational feasibilities), therefore only provides a guide as to possible costs.
- 5.29 It should also be noted that, even if a voluntary or temporary solution is achieved, if a full planning application is subsequently either not submitted or not successful, then a permanent solution may be required (assuming the undesirability of a series of temporary "fixes") and that liability may fall to the Council as "works in default".

### **Risks and Issues**

- 5.30 Aside from health risks to the local population (covered elsewhere in this report), the risks to the Council are reputational, legal and financial.
- 5.31 The reputational risk continues to be significant. The matter of the fires/smoke from the Site (and the consequent impact on residents) has already been subject to significant media coverage local, national and international and continues to be so. The longer the matter remains "unresolved" or, at least, without a clear and publicly understood/supported course of action the more reputational harm the Council suffers.
- 5.32 The legal risk includes that whichever contaminated land decision the Council makes and whether the service of either an Abatement Notice or Remediation Notice occurs, there is a significant likelihood of a legal challenge (whether by judicial review or appeal).
- 5.33 Whilst such challenge may be unavoidable in the current circumstances, the rigorous analysis of the issues, presentation of a robust rationale following careful consideration of all relevant factors in the context of suitable legal advice will minimise and mitigate the impact of such legal challenges. Nevertheless, defending such legal

- challenges creates a very considerable financial and human resource burden on the Council.
- 5.34 The financial risk is substantial. Some of it has been in relation to the scientific study of the issues at the Site and obtaining legal advice pertaining to environmental health matters (Contaminated Land and statutory nuisance). Some of it may also prove difficult to avoid if, for example, the landowner refuses or fails to carry out the necessary remedial works and abandons the land, then further enforcement action may be impractical to pursue.
- 5.35 The Council may then be faced with the choice of either leaving the site in its current state (and facing greater legal/reputational challenge due to a continuing impact on residents) or executing the works in default at potentially very substantial cost (as outlined above).
- 5.36 There are also risks with any redevelopment of the Site. If the landowner's intended full planning application (should one be received in the future) is successful then that would potentially open a path for a permanent solution to stop the fires delivered by the landowner as part of the phased redevelopment works.
- 5.37 However, this would still take some years and the likely result in a significantly greater volume of HGV traffic during the works (potentially including contaminated waste transported by road through the borough with associated risks) and potential pollution risks associated with "disturbing" the waste.
- 5.38 Nevertheless, the Green Belt status of the Site poses a strict policy constraint and the need to demonstrate the necessary very special circumstances case to justify the proposed development. It should be noted that the fires could be stopped without the physical redevelopment of the site concerned.
- 5.39 Finally, there is currently limited scientific evidence regarding the longer-term impacts of exposure to short-lived peaks of particulate matter pollution on the health of those exposed. Additionally, the relative recent recognition of the importance of parity of mental and physical health means that the current evidence base has gaps pertaining to the impact of recurrent pollution events on the mental health of the local population. There are therefore plausible risks relating to both the longer-term physical health impacts and mental health impacts on the local population which the Council has to consider.

### **REASONS AND OPTIONS**

In line with its statutory roles, powers and duties, the Council embarked on a number of steps to examine and address the situation at the Site.

There are no specific decisions to be taken by Members at this stage as a result of this report, but the options considered (both since 2022 and at present) by officers include:

# 1) Do Nothing

This was considered and rejected as the volume of decomposing waste could lead to ongoing fires for decades, unchecked (and unending) suffering for residents, possible breach of statutory duties, extreme likelihood of legal challenge and major sustained criticism.

## 2) Proactive Research, Enforcement and Support

This was considered to be the best overall approach to ensure a clear understanding (through studies and expert advice) of the problem to be solved, a robust base for the decisions/actions to be taken (including clear routes for enforcement) and, in working with the landowner, to provide the quickest and most productive route to bringing the fires to an end.

### **IMPLICATIONS AND RISKS**

# **Financial Implications and Risks**

Potential costs faced by the Council are reflected in section 5 of this report. This is presented as a "worst case" scenario including if the Council is obliged (or decides) to conduct works "in default" if the landowner fails to comply with the relevant Notice.

These are outline/estimated figures as full operational/technical assessments would still need to carried out first for programming any remedial/prevention works at the site.

It should be noted that the timespan into the future allows for two rounds of the temporary measure although the second round may not be required due to either the effectiveness of the first round or that the landowner receives planning permission and embarks on the appropriate redevelopment work.

It should also be noted that, even after the completion of any permanent or temporary works, air quality monitoring is likely to be required, albeit possibly reduced, to continue for some time to check/confirm the reduction in pollution.

# **Legal Implications and Risks**

This report is a member update with no separate legal implications.

# **Human Resources Implications and Risks**

Due to financial pressures, the Council's staffing complement has been significantly reduced in recent years and this has a notable current impact on the staff in the departments which have been dealing with the very substantive demands of responding to the issues relating to the site.

This impact is likely to continue for some time into the future and sustainability will have to be considered.

There are no other known HR implications and risks.

# **Equalities Implications and Risks**

Reduced air quality due to environmental pollution is likely to have a greater impact on those with underlying health conditions (particularly respiratory). Such conditions are more likely to be prevalent in the elderly. Young children are also more susceptible to the effects of poor air quality owing to the stage of physical development and respiration rate.

Access to green and blue spaces has a positive effect on mental health and wellbeing. Those with poorer mental health/resilience would be more impacted by a restriction in access to public open spaces.

Residents not being able to use outdoor facilities (such as their gardens or public parks) during warmer weather (particularly school summer holidays) is likely to impact children more significantly (eg. play and development) and less affluent residents or those without private gardens who rely more on public outdoor spaces for recreation.

# Health and Wellbeing Implications and Risks

Fires causing frequent but short-lived peaks of particulate air pollution are likely to increase the risk of exacerbations of existing cardiovascular and respiratory conditions (e.g. heart attack and stroke). Separately, continuing concern about the fires with no obvious remedy in sight will have a negative impact on the mental wellbeing of resident

# **Environmental and Climate Change Implications and Risks**

Climate change and the resulting increases in extreme weather events (such as drought and heat waves) are likely to increase the number of fires occurring at the site.

Repeated fires at the site will increase air pollution of the environment, thereby contributing additional products of combustion (in particular carbon emissions) that contribute to the accumulation of greenhouse gases and subsequent global warming.

Whilst air and water testing has shown that such additional pollution may not have breached any relevant regulatory thresholds, the cumulative impact of such ongoing pollution will be negative.

The London Fire Brigade, in responding to multiple repeated fires at this single site, is likely to be using very substantial volumes of water – especially during periods of peak heat and peak likeliness of drought and water shortages. Run off water from such events is also likely to include several dissolved pollutant compounds that may enter the wider ecosystem.

END OF MAIN REPORT

BACKGROUND PAPERS & APPENDICES FOLLOW BELOW

### **BACKGROUND PAPERS**

<u>Documents referenced or considered in the production of this report:</u>

# **Arnold's Field – Technical Note on Site Investigations**

March 2012, Jacobs Engineering UK Ltd. (for Environment Agency)

Ground Investigation Report – Arnold's Field, Launders Lane December 2023, GESL

Possible Health Impacts of Fires at Launders Lane: Havering Cancer Incidence

August 2024, Havering Council

Launders Lane Air Quality Monitoring Report (May 2023 – Sept 2024)

March 2025, TRL

The Effect of Arnold's Field Fires on the Respiratory Health of the Surrounding Population

April 2025, Havering Council

Review of Asbestos Monitoring at Arnold's Field, Launders Lane April 2025, Havering Council

Launders Lane (Arnold's Field) – Capping Options Appraisal June 2025, Havering Council

Breathe London Second Air Quality Report (Launders Lane Fires)
August 2025, Imperial College Environmental Research Group

All of the above documents are available via the Launders Lane webpage on the Council's website here:

Response to fires at Arnolds Field, Launders Lane | London Borough of Havering

### **APPENDIX 1**

## **Brief History (Site and Actions)**

- 1800s = agricultural fields
- 1960s = site used (legally) for the extraction of sand and gravel
- 1970s (approx.) = site used (legally) as a landfill for waste
- 1980s (approx.) = site restored to its previous (ground) levels
- 1998 = new landowner (not the current one)
- 1999 = planning permission was given for the site to be improved through importation of inert waste and soils to allow agriculture
- 2000 = further planning permission was granted that changed the approved profile of the land (raising it further) and sought use as community woodland rather than agriculture
- 2003/04 = Council identified that significant excess material had been deposited.
- 2004 = Council issued formal Enforcement and Stop notices
- 2005 = Planning Inspectorate upholds the Council's enforcement notices (ie. landowner loses appeal) and extends compliance period to Nov. 2006
- 2006 = landowning company dissolved itself
- 2008 = new landowner emerges
- 2005-09 = no clear evidence of additional waste being deposited
- 2010 = Council investigations suggests additional inert material had been brought onto the land during that year so began developing legal action (but overtaken by MPS and EA)
- 2011 = MPS raids site for drugs and firearms resulting in landowner being sentenced to six years in prison
- 2011/12 = EA/Jacobs/Costain site exploration/report
- 2011-14 = unregulated deposit of significant volumes of waste (EA conducts investigation)
- 2012-14 = EA proactive evidence gathering on waste dumping
- 2014 = site secured (main gate) and no further significant dumping
- 2017 = current landowner acquires site
- 2017-19 = Environment Agency conducts criminal prosecution
- 2019 = custodial sentences and fines issued on waste dumping gang (EA prosecution)
- 2019 = LFB data indicates "start of fires" (ie. more than just one per year)
- 2022 = Council installs first air quality monitors
- 2022 = Council commissions air pollution study (TRL)
- 2023 = Council commissions intrusive soil investigation
- 2024 = Council conducts study of cancer incidence
- 2024 = following assessment, the Council concludes that site does not meet EPA threshold of "contaminated land"
- 2024 = Council serves Abatement Notice (later withdrawn and timescales set for landowner)
- 2024 = Council serves Community Protection Warning on landowner
- 2024 = Council commissions asbestos study
- 2024 = a judicial review is lodged against the Council for the "contaminated land" decision
- 2024 = Council conducts review of NHS data on respiratory health
- 2024 = Council commissions options appraisal to stop fires (prevent oxygen getting underground)
- 2025 = Environment Agency confirms no abnormal pollution in watercourse
- 2025 = outcome from judicial review is issued
- 2025 = EPG options appraisal report is received
- 2025 = Breathe London (ERG/Imperial) final air quality report received

## **APPENDIX 2**

## **List of Partners and Specialist Agencies**

In addition to commissioning specialist studies from a number of consultants, the Council has consistently worked with key agencies and engaged with key stakeholders since 2022 in a concerted effort to identify and address the issues at Launders Lane (Arnold's Field).

This approach has included benefitting from expert opinion in the Technical Group as well as wider discussion/advice in the Partners' Meeting.

Those agencies and stakeholders have included:

- London Fire Brigade
- Environment Agency
- UK Health Security Agency
- Imperial College London (Environmental Research Group)
- Transport Research Laboratory (TRL)
- Greater London Authority
- Metropolitan Police Service
- Local Members of Parliament
- community representatives
- other local authorities

In addition, other specialist/scientific advice, input, services or support was commissioned or otherwise received on key subject areas from the following:

- Air Quality
  - o Imperial College London Environmental Research Group
    - (as part of Breathe London project)
  - Transport Research (TRL)
  - University College London
  - o UKHSA Radiation, Chemical & Environmental Hazards
  - o UKHSA North London Health Protection Team
- Health Impacts
  - National Disease Registration Service (NHS England)
  - o Imperial College London Environmental Research Group
  - UKHSA Radiation, Chemical & Environmental Hazards
  - UKHSA North London Health Protection Team
- Soil Assessment and Land Contamination
  - Geo-Environmental Services Ltd.
  - Land Quality Management
- Subterranean Fire Retardation
  - o Environmental Protection Group
  - GRS Roadstone
  - Soil Treatment Services
- Asbestos
  - (UKAS-accredited consultant has requested no disclosure but used certified sampling and analysis techniques)
- Water
  - Environment Agency

