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Havering
LONDON BOROUGH

CABINET

7.00 pm	Wednesday 10 December 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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Webcast

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.

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:-

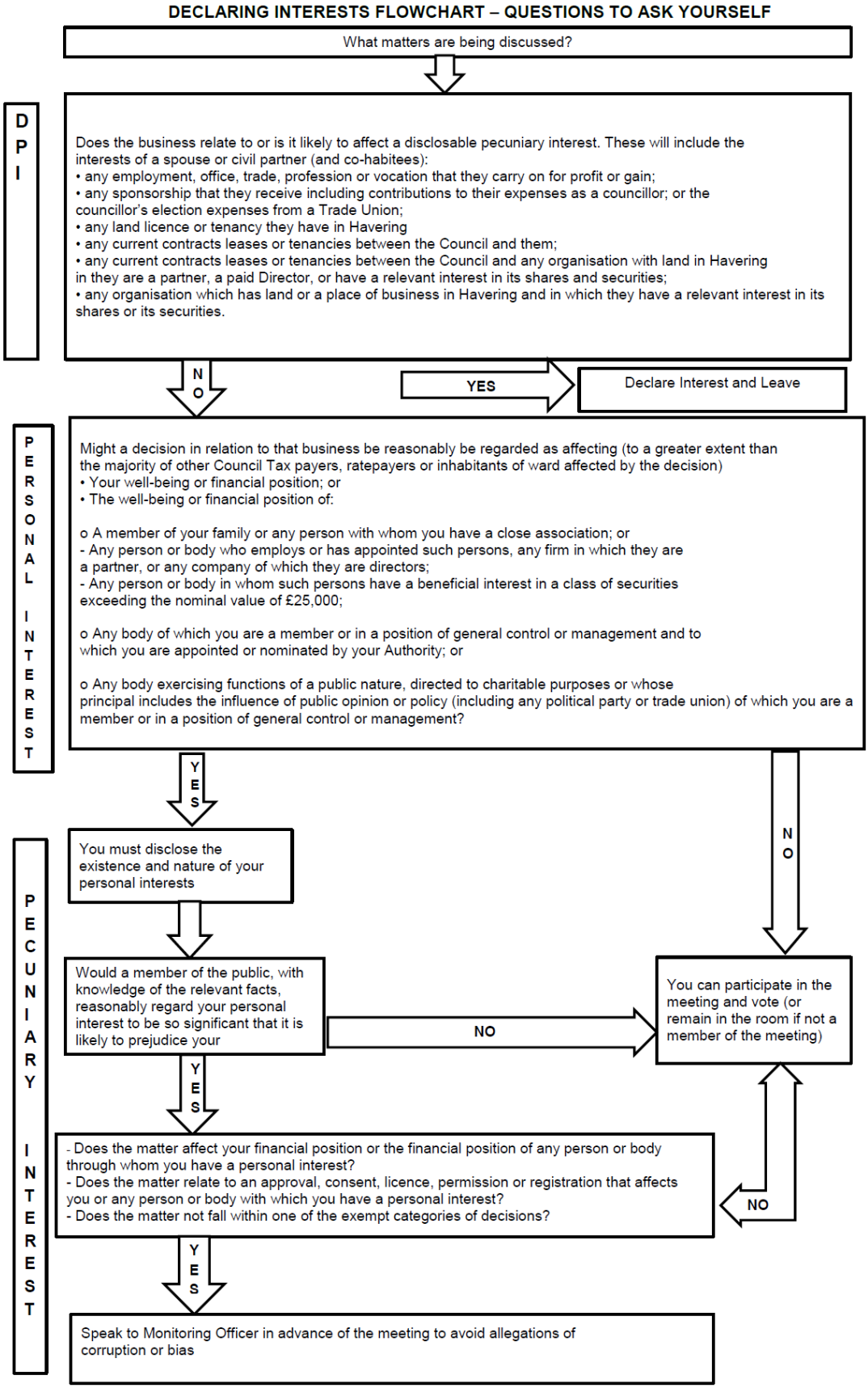
- filming, photographing or making an audio recording of the proceedings of the meeting;
- using any other means for enabling persons not present to see or hear proceedings at a meeting as it takes place or later; or
- reporting or providing commentary on proceedings at a meeting, orally or in writing,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

Cabinet, 10 December 2025



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 - 24)

To approve as a correct record the minutes of the meeting held on 12th November 2025**,** and to authorise the Chair to sign them.

5 IMPLEMENTATION OF A 30 PLACE SPECIAL EDUCATIONAL NEEDS & DISABILITIES (SEND) UNIT AT ROYAL LIBERTY SCHOOL FOR PUPILS WITH COMMUNICATION & INTERACTION (C&I) NEEDS (Pages 25 - 82)

Report attached.

6 PERMISSION TO PROCURE A HAVERING SHORT BREAKS OPEN FRAMEWORK (Pages 83 - 100)

Report attached.

7 PERMISSION TO EXTEND THE ADULTS DRUG & ALCOHOL CONTRACT FOR 3 YEARS AND APPROVAL FOR AN UPLIFT (Pages 101 - 114)

Report attached.

8 PRIVATE SECTOR HOUSING ENFORCEMENT SCHEME. NEW DESIGNATIONS FOR ADDITIONAL LICENSING FOR HOUSING OF MULTIPLE OCCUPATION & SELECTIVE LICENSING. (Pages 115 - 592)

Report attached.

9 BRIDGE CLOSE REGENERATION - MAKING OF THE COMPULSORY PURCHASE ORDER (Pages 593 - 1008)

Report attached.

This Report is part exempt and **Appendix A** is not available for public inspection as it contains or relates to exempt information within the meaning of paragraph 3 of Schedule 12A to the Local Government Act 1972. It is exempt because it refers to the financial or business affairs of any particular person (including the authority holding that information), and the public interest in maintaining the exemption outweighs the public interest in disclosing the information

10 FUTURE PROPOSALS FOR FORMER LIBRARY PREMISES (Pages 1009 - 1022)

Report attached.

11 CORPORATE PLAN - Q2 PERFORMANCE REPORT (2025/26) (Pages 1023 - 1040)

Report attached.

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MINUTES OF A CABINET MEETING
Council Chamber - Town Hall
Wednesday, 12 November 2025
(7.00 - 9.00 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 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

In attendance: Councillor Michael White (CON), Councillor Keith Darvill (LAB), Councillor Martin Goode (EHRG)

33 **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.

34 **APOLOGIES FOR ABSENCE**

Apologies received from Councillor Paul Middleton, the Councillor joined the meeting via the Zoom link.

35 **DISCLOSURES OF INTEREST**

There were no declarations of interest.

36 **MINUTES**

The minutes of the meetings held on **15th October 2025,** were agreed as a correct record and the Chair signed them

37 **ZANE'S LAW**

Report Title: **Zane's Law**

Presented by: **Cllr. Ray Morgon, Leader of the Council**

This item was considered first on the Agenda as Zane's father, Mr Kye Gbangbola was in attendance together with Ms Ruth Kettle-Frisby (campaigner in support of clean air initiatives) and addressed the members in the chamber.

The Leader thanked them for attending, and reiterated Havering's support with the campaign.

Summary:

Zane's Law seeks, in brief, to achieve:

- Councils to maintain a local public Register of Land that may be contaminated.
- Environment Agency to maintain a national public Register of Contaminated Land.
- Councils to inspect any land on the Register and to pursue remediation of land that poses harm.
- Councils to inspect previously closed ("legacy") landfill sites and to pursue remediation of land that poses a risk of significant harm.
- Government to fully fund councils to conduct the above actions (costs recovered from polluter, as appropriate).

A number of councils (particularly in Surrey and London) and the Greater London Authority have expressed support for Zane's Law.

It is proposed that, in seeking to keep local residents safe and to reduce the risks of harm, Havering Council supports the principles of "Zane's Law".

Cabinet Members:

Expressed support for achieving the principles of Zane's Law and **agreed** to lobby the Government for its introduction.

38 **DECANT POLICY**

Report Title: **Decant Policy**

Presented by: **Councillor Natasha Summers, Cabinet Member for Housing Need and Climate Change**

Summary:

This report seeks the approval of the Decant Policy which sets out the offer to council tenants and leaseholders who need to temporarily or permanently move out of their home in order for repairs to be undertaken or the property redeveloped. The policy also sets out the roles and responsibilities for officers who support these moves.

The policy is applicable to all secure tenants (including those on introductory or fixed-term tenancies) and leaseholders who need to move from their current home for repairs to be undertaken.

Cabinet:

Approved the proposed Decant Policy in Appendix 1

Delegated any minor amendments to the Policy to the Director of Living Well in consultation with the Lead Cabinet Member for Housing Need and Climate Change

39 **VULNERABLE PERSON POLICY**

Report Title: **Vulnerable Person Policy for Council Tenants (2025)**

Presented by: **Councillor Paul McGeary, Cabinet Member for Housing and Property**

Summary:

This policy sets out Havering Housing Services' commitment to assisting our vulnerable tenants to access our services and sustain their tenancy. It describes how a resident's vulnerabilities will be identified and recorded, and how we can adjust the way we deliver services to ensure the resident is not disadvantaged by their vulnerability.

Cabinet:

Approved the Vulnerable Person Policy for Council Tenants.

40 **REVIEW OF FOSTER CARER ALLOWANCES**

Report Title: **Review of Foster Carer Allowances**

Presented by: **Councillor Oscar Ford - Cabinet member for Children and Young People**

Summary:

As corporate parents, we have a statutory duty to recruit and retain foster carers who can provide a range of homes offering the appropriate support to meet the needs of the children and young people in our care.

1. It is a key priority to ensure that (where it is safe to do so) children in care remain within, or close to, their local area so that they can continue attending their school or clubs and maintain appropriate connections with family and friends.

2. As of the end of March 2024, there were 57,065 approved mainstream foster carers in England, which is a 4% decrease from the previous year. From 2021 to 2024, there was a 9.6% decrease in the number of registered foster carers nationally. Local authorities nationwide are facing recruitment challenges. The reasons cited for foster carers leaving the profession are lack of support and financial pressures.

3. The current Havering financial allowance structure has remained largely static since 2021 when a previous uplift and wider council package was agreed. However, since this point increases in the cost of living and associated care costs have not been reflected.

4. Benchmarking data from other East London authorities and anecdotal feedback from our foster carers, has evidenced that our current fostering rates are not currently in line with neighbouring authorities.

5. Havering are part of the 'Local Community Fostering' (Greater London East) Fostering Hub initiative which was launched in May 2024. The hub hosted by the London Borough of Waltham Forest was established as a regional fostering hub involving Waltham Forest, Barking & Dagenham, Havering, Newham, Redbridge, and Tower Hamlets, with funding from the government's Fostering Recruitment and Retention Programme. This programme provided support to local authorities in finding new ways to recruit foster carers, which included funding for regional hubs like this one and a range of initiatives such as the Mockingbird constellations. Benchmarking at the time put Havering as one of the leading local authorities however this has changed over the last 4 years as the other local authorities reviewed their allowances.

6. Feedback from carers is that our current allowances is limiting interest for new carers to join and causing existing carers to considering fostering for other authorities. The benchmarking has shown that our current rates are also below the national minimum weekly allowance government guidance. We know currently that approximately 20% of Havering residents who apply to be foster carers go on to do so with another local authority or fostering agency.

7. This proposal seeks to increase the weekly fee paid to our in-house foster carers, as well as increasing the weekly allowance for the child (or children) they are caring for to be more competitive within the market.

8. In-house foster care is the most cost-effective option for the local authority. The use of independent (agency) carers costs, on average, an additional £32,000 per child per year.

9. By improving our financial incentives alongside our marketing and recruitment support, we aim to meet our target of an additional 17 in-house foster carers year on year. The target for foster carer recruitment in 2026-27 is yet to be determined however, we will continue to have robust targets for recruitment as part of our strategic plans.

Cabinet:

Agreed to support recruitment and retention of our in-house foster carers

Cabinet agreed to;

Increase the weekly foster carers' fee allowance and weekly allowance per child as set out in paragraph 2.5 of the Report to ensure we are offering a fair and competitive rate when compared to neighbouring boroughs and the recommended national minimum allowance.

41 EAST LONDON JOINT WASTE PLAN SUBMISSION

Report Title: East London Joint Waste Plan Submission

Presented by: **Councillor Graham Williamson, Cabinet Member for Regeneration & Development**

Summary:

1.1 In July 2024 and April 2025, Cabinet gave approval to consult on the East London Joint Waste Plan (ELJWP) which, once adopted, will form part of the borough's Development Plan. The Joint Waste Plan has been prepared with the other East London Waste Authorities (the London Boroughs of Barking and Dagenham, Newham and Redbridge). The ELJWP has gone through two rounds of statutory consultation and is now ready to be submitted to the Secretary of State for independent examination.

1.2 Member approval is sought to submit the East London Joint Waste Plan for independent public examination, under Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations (2012).

Cabinet:

Endorsed the report and its appendices, and made the following recommendations to be presented at Full Council:

That Full Council:

1. Authorise officers to proceed under Regulation 22 to submit the East London Joint Waste Plan Submission Plan (appendix 1, the East London Joint Waste Plan, approved by Cabinet in April 2025, as amended by the modifications provided in appendix 17) and associated documents (as set out in paragraph 2.19) to the Secretary of State for Housing, Communities and Local Government, for independent public examination.

2. Delegate authority to the Director of Planning and Public Protection, following consultation with the Cabinet Member for Regeneration to:

    - Make any inconsequential or factual updates to the Submission Documents listed in paragraph 2.19 to facilitate submission of the Plan under Regulation 22.
    - Make a formal request of the Planning Inspector at an appropriate point during the examination of the Waste Plan to recommend modifications to the Plan to make it sound and legally compliant in accordance with section 20 (7c) of the Planning and Compulsory Purchase Act; and
    - Exercise all examination procedural matters as prescribed by the Planning and Compulsory Purchase Act 2004 and associated Regulations, including updates to submission documents and agreeing and consulting on further modifications, required to make the Plan sound.

42 **CHIPPENHAM ROAD - PROPOSED MAKING OF THE PLANNING COMPULSORY PURCHASE ORDER**

Report Title: **Harold Hill Town Centre - Chippenham Road Making of a Compulsory Purchase Order**

Presented by: **Councillor Graham Williamson – Cabinet Member for Regeneration & Development**

Summary:

1.1 This report outlines the progress made on land assembly at Chippenham Road and seeks Cabinet approval to authorise the making of a Compulsory Purchase Order (CPO) to acquire the remaining land and property interests necessary to facilitate the regeneration of the site. This is a request for final approval to make the CPO.

1.2 The Chippenham Road scheme forms a key part of the Harold Hill Town Centre regeneration proposals and is essential to deliver new affordable homes and associated public realm improvements. The site has been identified as a priority within the 12 Estates regeneration programme and is

considered critical to meeting the Council's housing delivery and placemaking objectives.

1.3 The following recommendations are made on the basis that a CPO is considered necessary to secure delivery of the Chippenham Road regeneration scheme, in accordance with planning policy and the Local Plan. The Scheme will promote the economic, social, and environmental well-being of the area and is deliverable within a reasonable timescale. Equitable steps to acquire land by agreement have been taken and there is no viable alternative to the use of CPO. The Council's actions are proportionate, in line with human rights and equalities duties.

Cabinet:

2.1 **Resolved** that there is a compelling case in public interest for the Council to make a Compulsory Purchase Order (CPO).

2.2 **Resolved** that the public interest in making a CPO outweighs interference with rights under the Human Rights Act 1998.

2.3 **Agreed** to the Council making a Compulsory Purchase Order (CPO) pursuant to the statutory powers contained in section 226(1)(a) of the Town and Country Planning Act 1990 (as amended), and section 13 of the Local Government (Misc. Provisions) Act 1976 and all other necessary action to acquire all property and other proprietary interests on the land, including where appropriate new rights, located within the outline on the CPO Red Line Plan at Appendix B, for the purposes of delivering the new homes and regeneration of Chippenham Road.

2.4 **Agreed** that the Strategic Director of Place, in consultation with the Leader of the Council, Deputy Director Legal and Governance and Strategic Director of Resources be authorised to:

2.4.1 To make the CPO or multiple CPOs to enable the acquisition of land, interest and rights within the CPO Red Line Plan as attached to this report at Appendix B;

2.4.2 To appoint surveyors, solicitors, barristers and any other professionals required to promote the CPO(s) and to facilitate the vacant possession of interests located within the CPO Red Line Plan;

2.4.3 To settle the final form and content of the CPO(s) and associated documentation to include the;

- CPO Schedule of Interests - Appendix A;
- Plans identifying location and extent of interests subject of the proposed CPO - Appendix B;
- Equalities Impact Assessment - Appendix C;
- Statement of Reasons - Appendix D;
- Community Engagement - Appendix E;
- Financial Implications - Appendix F (Exempt)

2.4.4 To make amendments to the CPO if necessary, including a reduction or increase to the extent of the land included in the draft Order Map.

2.4.5 To take all necessary steps to secure the making, confirmation and implementation of the CPO(s) including publication and service of notices and presentation of the Councils case at Public Inquiry, or Court should such representation be necessary;

2.4.6 To take such actions to continue attempts to acquire properties and proprietary interests within the CPO Red Line Plan by agreement, such actions to include; the relocation of residents and statutory undertakers apparatus or Communication Code Operators; and any other interests and setting out the terms for the withdrawal of objections to the CPO(s); and

2.4.7 To pay all costs associated with making the Order, including the compensation payable to landowners and their professional fees;

2.4.8 Agreed to appoint external consultants to assess, agree and pay any compensation and claims arising from redevelopment of the Order Land pursuant to the Order;

2.4.9 That following the confirmation of the CPO(s) by the Secretary of State, secure vacant possession of all properties and proprietary interests located within the confirmed CPO Red Line land to include:

2.4.9.1 To take all necessary actions to secure the making and confirmation of a General Vesting Declaration (GVD) or multiple GVD's under the Compulsory Purchase and (Vesting Declarations) Act 1981 and /or to serve Notices to Treat and Entry (if required); and

2.4.9.2 To appropriate to planning / or housing purposes as necessary, any parcel of land within the CPO Red Line Plan under Section 203 of the Housing and Planning Act 2016; and

2.4.9.3 if necessary make representation to the Upper Tribunal (Lands Chamber) or court should such representation be appropriate.

2.5 **Agreed** that in the event that the Cabinet approves resolutions 2.1 and 2.2 above, and upon the Deputy Director Legal and Governance being satisfied that further information and all the Equalities Impact Assessment outcomes are satisfactory and to not require reference back to Cabinet, that the Deputy Director Legal and Governance be authorised to affix the common Seal of the Council to the CPO(s), GVD(s), maps and elsewhere and to take all necessary steps as

necessary, such as to issue notices and sign certificates to attain the resolutions above.

2.6 **Noted** that:
Any expenditure associated with the following will be met from the Council's existing approved budgets:

a) preparatory work required to make the Compulsory Purchase Order; and
b) payment of compensation arising from the CPO, together with the associated capital costs required to undertake the construction works.

43 CORPORATE PARENTING STRATEGY

Report Title: **Corporate Parenting Strategy 2025 – 2028**

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

Summary:

Havering's draft Corporate Parenting Strategy 2025–2028 sets out our renewed commitment to ensuring that children in care and care experienced young people are supported to thrive. The strategy is guided by the borough's WISH principles, ensuring every child is Well, Inspired, Safe, Heard, and Treated Fairly and is aligned with the Havering Vision and the Integrated Starting Well Plan.

The strategy proposes a coordinated, borough wide approach to corporate parenting, where professionals across services act collectively as responsible parents. It outlines key actions across health, education, participation, and safeguarding.

The strategy will be overseen by the Corporate Parenting Panel, which includes the Cabinet Member for Children and Young People and other stakeholders. This panel will monitor progress, ensure accountability, and incorporate feedback from children in care and care experienced young people.

Cabinet:

Approved the Corporate Parenting Strategy 2025–2028 attached at Appendix One.

Noted that the Corporate Parenting Panel will monitor the delivery of the strategy and associated action plan, which will include scrutinising that there is:

- Timely access to health and mental health services.
- Strengthened education, employment, and mentoring pathways.
- Strengthened housing pathways.
- Safer placements and community environments.
- Meaningful participation of young people in shaping services.
- Promotion of fairness, inclusion, and cultural celebration.

Noted that the Corporate Parenting Panel will monitor progress through key performance indicators and qualitative feedback, with updates to be shared with stakeholders, including children and young people, by officers in the Starting Well directorate.

Directed officers to carry out an internal review of the strategy for late 2027, and to make any interim revisions to the action plan as needed to ensure continued relevance and impact.

44 LEARNING DISABILITY EMPLOYMENT CHARTER

Report Title: **Havering Employment Charter for Autistic People and People with Learning Disabilities**

Presented by: **Councillor Gillian Ford; Deputy Leader of the Council and Cabinet Member for Adults and Wellbeing**

Summary:

1. The Havering Employment Charter for the Employment of People with Learning Disabilities and Autistic People aims at increasing the number of autistic people and people with a learning disability employed directly by Havering Council. The charter aligns with the Council's wider aims under the Disability Confident Employer Scheme and is the initial step of a multi-staged approach aimed at reducing employment inequalities for people with learning disabilities and autistic people within the borough.

2. The charter is underpinned by several key principles aimed at developing and sustaining meaningful employment opportunities, where appropriate and suitably assessed for employment, within the council. These are nurturing a disability confident and inclusive culture within Havering Council, empowering employing managers, providing competitive meaningful employment, providing a person-centred approach to work and workplace support, and a commitment to continuous evaluation and improvement of the workforce.

3. People with learning disabilities and autistic people are two groups, among several others with protected characteristics, of individuals who are heavily underrepresented in the workforce, being significantly more likely to be socio-economically inactive even when compared to people with other recognised disabilities.

4. The council undertakes various initiatives aimed at reducing economic activity within Havering, and whilst these initiatives may include activity for autistic people and people with learning disabilities, due to the specific adaptations and requirements, a more focused approach will provide greater refinement in addressing the inequality.

5. The implementation of the charter will be overseen by the Learning Disabilities and Autism Employment Steering Group and monitored within the annual reporting on Workforce data. The steering group will initially support the council to improve data collection and reporting employment of individuals with disabilities and develop an action plan across the council. The action plan will be reviewed and refreshed annually to adapt to emerging trends, initiatives and developments relating to the employment of autistic people and people with learning disabilities.

Cabinet

2.1 **Agreed** to support the addition of the of the employment charter into the Council's Human Resources recruitment and selection policy within the conditions of the Disability Confident scheme.

Overview & Scrutiny Recommendations:

At its meeting on 6 November 2025, the People Overview and Scrutiny Sub-Committee discussed and made some recommendations re the report being considered by Cabinet on the Havering Learning Disability and Employment Charter.

The specific recommendations in this area are as shown below and Cabinet was asked to respond to these at the Cabinet meeting.

If agreed, Cabinet is also asked to approve that a final version of the Charter, incorporating these changes, be published as soon as is practicable, on the Council's website alongside the agenda papers for this Cabinet meeting.

1. That Cabinet considers and responds to the following recommendations made by the People Overview and Scrutiny Sub-Committee in relation to the report on the Havering Learning Disability and Autism Employment Charter due to be considered by Cabinet at its meeting on 12 November 2025.

    - Section 5.1.1: The term 'positive discrimination' be amended to 'positive action', aligning with the Equality Act 2010.
    - Sections 5.1.3 and 5.1.4: These sections be amended as follows:
        - 5.1.3 will now focus on ensuring training and support to enable people with learning disabilities and autistic people to develop skills for career progression.

- 5.1.4 will now refer to reviewing the effectiveness of supported employment services, rather than continuous assessment.

2. That Cabinet notes that these refinements strengthen the Charter, ensure compliance with equality legislation, and reinforce the Council's commitment to fairness, accessibility, and impact.

3. Should the above proposed amendments be accepted by Cabinet, that the final version of the Havering Learning Disability and Autism Employment Charter be published for clarity on the Council's website page for this meeting of Cabinet.

Cabinet agreed to all of the above recommendations and agreed that the updated document is attached below as confirmation.

The London Borough of Havering Employment Charter – Employment of People with Learning Disabilities and Autistic People

1.0 Introduction

1.1. Inequalities and inequity in employment can be associated with inequalities and inequity in other areas of life including health, social mobility, and education. People with learning disabilities and autistic people are more likely to be experience life inequalities and be unemployed relative to both the general population and even people with other kinds of disability.

1.2. To help reduce inequalities in employment outcomes for people with learning disabilities and autistic people, the London Borough of Havering will adopt the following charter to increase the number of people with learning disabilities and autistic people employed locally.

1.3. This charter forms part of the borough's wider employment strategy, the local autism strategy, and our commitment to the Disability Confident Employer scheme.

2.0 Vision

2.1. To promote employment opportunities and personal and career development for people with learning disabilities and autistic people within Havering to reduce inequalities by enabling equal employment opportunities for meaningful and sustainable employment.

3.0 Mission

3.1. To increase the number of individuals with learning disabilities and autism employed directly by the London Borough of Havering and to support them in achieving their employment goals through appropriate personalised development once employed.

4.0 Key Principles for Employment Opportunities

4.1. To enable the local authority to achieve its vision the charter sets out six key principles that the local authority will adopt to make recruitment, and employment opportunities more inclusive for people with learning disabilities and autistic people.

4.1.1. Meaningful Competitive Employment: Ensure that the local authority provides job opportunities that provide competitive living wages and enable people to meaningfully develop their career paths.
4.1.2. Disability Confident Employer: Empower hiring managers to be confident in the recruitment and support of individuals with learning disabilities and autistic people.
4.1.3. Person-Centred Approach: Tailor employment opportunities to meet the unique needs, preferences, and goals of each person.
4.1.4. Inclusion: Promote inclusive workplaces where people with disabilities work alongside their non-disabled peers.
4.1.5. Empowerment: Empower people with disabilities to make informed choices about their employment and career paths.
4.1.6. Continuous Improvement: Commit to ongoing evaluation and improvement of the recruitment and employment practices within Havering local authority.

5.0 Objectives of the Employment Charter for People with Learning Disabilities and Autistic People
5.1. The objectives associated with adoption of the employment charter for people with learning disabilities and autistic people are:
5.1.1. To Increase Employment Opportunities within Havering Local Authority for People with Learning Disabilities and Autistic People: Develop a positive action approach to job opportunities and expand job opportunities available for people with learning disabilities and autistic people within the local authority. This objective will apply to all employment opportunities within Havering local authority including all paid employment, internships, graduate schemes, apprenticeships, and work experience opportunities.
5.1.2. To Further Development the Local Authority Towards Maintaining its Position as a Disability Confident Employer: Develop managerial training to further develop inclusive workplace environment where employees can be confident in interviewing, recruitment of and support of individuals with learning disabilities and autistic people.
5.1.3. To Enhance Skills and Competencies of People with Learning Disabilities and Autistic People Employed by the Local Authority: Ensure that the council's approach to training and support enables people with learning disabilities and autistic people to develop the skills needed for carer development.
5.1.4. To Monitor and Evaluate the Success of the Interventions that are Aimed at Supporting the Implementation of the Employment Charter and Employment Principles: Review of the effectiveness of the supported employment services and make necessary adjustments to improve outcomes in the recruitment of people with learning disabilities and autistic people.

6.0 Key Actions to Support the Employment Charters Approach to Employment Opportunities

6.1. The following actions should be undertaken to implement this charter as part of the approach to making Havering local authority a more inclusive workplace:

6.1.1. Workforce Engagement: Engage with the workforce to promote the benefits of hiring individuals with learning disabilities and autistic people and provide training on inclusive practices.

6.1.2. Selective Recruitment Focus: Automatically make people with learning disabilities and autistic people who meet the minimum criteria eligible for interviews when applying for job opportunities advertised across the local authority.

6.1.3. Inclusive Recruitment Practices: HR should support all hiring managers with adopting more flexible recruitment approaches across recruitment exercises to reduce disadvantages inherent in traditional interview and recruitment processes.

6.1.4. Individualized Employment Plans: Adopt inclusivity focused personalised employment plans that outline the individual's goals, strengths, and support needs.

6.1.5. Job Matching and Placement: Further support matching individuals with suitable job opportunities that align with their skills and interests.

6.1.6. On-the-Job Support: Provide ongoing person-centred support and coaching to help individuals succeed in their employment.

6.1.7. Community Partnerships: Collaborate with internal community organisations within Havering local authority to create a network of support for individuals with learning disabilities and autistic people in the workplace.

45 **2026-2029 MEDIUM TERM FINANCIAL STRATEGY UPDATE**

Report Title: **2026-2029 Medium Term Financial Strategy Update**

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

Summary:

The report provides an update on the progress towards setting the 2026/27 budget and the development of the 2026-2029 Medium Term Financial Strategy

1. This report provides an update on the progress towards setting the Council's budget for 2026/27. The report includes:

- Background
- An update on National funding changes
- Update on the revenue monitoring position for 2025/26
- Updates made to the Medium-Term Financial Strategy and revised budget gap
- Financing the budget and engagement with MHCLG

- Next Steps
- Medium-term budget initiatives

Cabinet:

2.1. Cabinet **noted** the medium-term financial position set out in this report

2.2 Cabinet **noted** the proposed savings and investment set out in this report and **authorised** officers to start the budget engagement process, including specific consultations (where required) to implement the savings in this report.

2.3 Cabinet **authorised** officers to action efficiency and invest to save proposals with immediate effect in 2025/26 where possible if the operational savings proposals are not public facing, and so therefore is not subject to consultation and an EQUIA.

2.4 Cabinet **noted** the position regarding further exceptional financial support from the Government and to note that officers will continually review and update the Medium Term Financial Strategy from now through to when the Budget is signed off by Full Council.

46 **SECOND QUARTER OF FINANCIAL YEAR 2025/26 REVENUE AND CAPITAL MONITORING REPORT**

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

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

Summary:

At the end of quarter two of the Financial Year the Council is forecasting an underspend of £7.65m against its General Fund budget of £292m. This includes use of Exceptional Financial Support. The DSG is forecasting an in year overspend that will bring the total deficit to £65m.

1. This report gives an overview of the Council's financial position setting out the forecast revenue expenditure as at the end of September 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 two.

Cabinet:

2.1 Cabinet **noted** the revenue monitoring position of the Council as at the end of September 2025 (quarter two of the financial year.) This includes a forecast underspend on the Council's General Fund of £7.65m (sections 4, 5 and 6), an underspend on the HRA of £2.33m

(Section 8) and an overspend of £28m DSG budgets that will bring the overall DSG deficit to £65m (section 9). The consequent impact on the Council's reserves is set out in section 11).

2.2 Cabinet **noted** the progress toward the delivery of savings as set out in the Council's MTFS as at the end of September 2025 (quarter two of the financial year) as set out in section 7

2.3 Cabinet **noted** the capital monitoring position of the Council as at the end of September 2025 (quarter two of the financial year) as set out in section 12

2.4 Cabinet **noted** the update in section 10 on the position of the Council's maintained schools and to delegate to the Director of Starting Well in conjunction with the Strategic Director for Resources and the appropriate Cabinet members the ability to grant a licensed deficit to qualifying schools.

Chairman

Havering
LONDON BOROUGH

CABINET

Subject Heading:	Implementation of a 30 place Special Educational Needs & Disabilities (SEND) Unit at The Royal Liberty School for pupils with Communication & Interaction (C&I) needs
Cabinet Member:	Councillor Oscar Ford, Cabinet Member for Children & Young People
ELT Lead:	Tara Geere, Director of Starting Well (DCS)
Report Author and contact details:	Pooneeta Mahadeo Pooneeta.mahadeo@havering.gov.uk Tel. 01708 431092
Policy context:	Havering's SEND and Alternative Provision Strategy emphasises the local authority's vision to ensure children, young people, and families have access to the same level of high-quality support and education, wherever they live in Havering. That children and young people with SEND can access the help and support they need to thrive and achieve within their local communities, that they can go to local education provision that meets their needs, access services and play an active role in the community close to where they live.
Financial summary:	The cost of Building works required to provide a SEND unit at Royal Liberty School has been estimated at £2.7m and this will be funded from within the High Needs Provision Capital Allocation (HNPCA). SEND Units in Havering will be normally funded in accordance with a Place Led Funding approach that complies with the

	Government's SEND Funding Reforms that came into effect in April 2018. For each place in the SEND unit, The Royal Liberty School will receive £30,000 from Revenue grant funding (DSG). This is made up of £10,000 'place funding' and £20,000 (2025/26 rate) 'top-up funding'.
Is this a Key Decision?	Yes as expenditure arising from implementation of the recommendations is likely to exceed £500,000
When should this matter be reviewed?	September 2027
Reviewing OSC:	People

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	
Resources - Enabling a resident-focused and resilient Council	

SUMMARY

To support the implementation of a SEND Unit at The Royal Liberty School from September 2027.

School	SEND Unit	No of pupils
The Royal Liberty School	Communication & Interaction Needs (ASD – Autistic Spectrum Disorder and SLCN – Speech Language and Communication Needs)	30 (11-16 years)

RECOMMENDATIONS

1. To allocate £2.7 from the High Needs Provision Capital Grant towards the payments as set out in the attached grant agreement.
2. To enter into the grant agreement in the form attached at Appendix 3.
3. To authorise Director of Starting Well to make changes to the grant agreement (including amendment to payment schedule and milestones) provided that the grant funding shall not exceed £2.7m.

REPORT DETAIL

1. The number of EHCPs is forecast to increase (as seen in the table below) for all four main SEND types with Communication and Interaction and Social, Emotional and Mental Health needs (SEMH) due to see the highest growth.

   There is a need for additional SEND places in the borough to meet the growing need.

Academic year	Cognition and Learning	Communication and Interaction	SEMH	Sensory and/or Physical	Total
2024/25	600	1813	582	256	3252
2025/26	646	2165	718	295	3823
2026/27	692	2534	864	342	4432
2027/28	735	2914	1009	392	5050
2028/29	783	3305	1199	443	5730

Havering Borough wide SEND projections

2. Havering's SEND projections show that the number of secondary school pupils with an Education, Health and Care (EHC) plan is projected to increase with the highest increase in Communication and Interaction.

Havering Secondary SEND projections

Academic year	Cognition and Learning	Communication and Interaction	SEMH	Sensory and/or Physical	Total
2024/25	127	252	181	35	595
2025/26	136	297	216	33	682
2026/27	140	361	245	45	791
2027/28	158	458	278	49	944
2028/29	175	550	364	67	1156

3. There are currently five secondary schools (4 with SEND Units and 1 with a Specially Resourced Provision) totalling 84 places, of which 72 places cater for pupils with Communication and Interaction needs.

4. Given the increasing numbers of C&I pupils with needs which are not severe enough to require a place at a special school, there is a need for additional secondary SEND Units to support these children within a mainstream school setting.

5. The creation of this local specialist provision should reduce the need to place secondary pupils outside of Havering, therefore reducing the cost of out borough placements.

6. The Royal Liberty School is a secondary school, rated by Ofsted as “good” with 750 places across Year 7 to Year 11. The school caters for children with an age range of 11-16 years and is considered by the Local Authority as the most appropriate location for a SEND Unit to be sited.

7. The SEND Unit at The Royal Liberty School will meet the needs of pupils with an EHC plan with C&I needs which are not severe enough to require a place at a special school but who will require spending significant proportions of their time in the SEND Unit. The proposed SEND Unit will enable these pupils to have their additional needs met while accessing education at a secondary school through a flexible approach tailored and adapted to their needs.

8. The new facility will enable young people with C&I needs to have their needs met through a flexible approach, tailored and adapted to the needs of each individual pupil. It will be for pupils who will require specialist support to enable them to access a mainstream secondary curriculum. It is proposed that the children will split their time between the mainstream school and having bespoke support within the Unit

9. The DfE has approved the request to make a significant change to The Royal Liberty School by introducing a SEND Unit for up to 30 places with effect from 1 September 2024 – Appendix 1

REASONS AND OPTIONS

Reasons for the decision:

10. The decision to implement a 30-place SEND Unit at The Royal Liberty School is driven by the significant and growing demand for specialist provision for pupils with Communication & Interaction (C&I) needs, including those with Autistic Spectrum Disorder (ASD) and Speech, Language and Communication Needs (SLCN), within Havering. Projections indicate a substantial increase in the number of children and young people requiring Education, Health and Care Plans (EHCPs), particularly in the area of C&I, over the coming years.

11. The establishment of this unit will enable more pupils to access high-quality, tailored support within their local community, reducing the need for costly out-of-borough placements and supporting the Council's vision for inclusive education. The Royal Liberty School has been identified as the most appropriate location due to its capacity, suitability, and commitment to inclusive practice. This decision aligns with Havering's SEND and Alternative Provision Strategy, ensuring that children and young people with SEND can thrive and achieve in a mainstream setting with the specialist support they require.

12. SFAET have commissioned a feasibility study and cost plan which estimates the SEND unit will cost £2,681,424. The grant award is for this maximum estimated cost.

Other options considered:

13. In considering how best to meet the growing demand for secondary SEND provision for pupils with Communication & Interaction needs in Havering, a range of options were evaluated:

    - **Expanding existing SEND Units within other secondary schools:** This option was considered but rejected due to limitations in available space and the capacity of current facilities. Most existing units are already operating at or near their maximum numbers, and further expansion would not be sufficient to address projected demand across the borough.
    - **Establishing a new special school:** While this could provide specialist provision for pupils with more severe needs, and Havering is considering opening a new special school in Sep 2027, this is not sufficient and not appropriate for this cohort requiring support. Many pupils with C&I needs benefit from a mainstream environment with targeted support, rather than a segregated setting.
    - **Maintaining the status quo and continuing out-of-borough placements:** This approach was rejected due to the high cost implications and the impact on pupils and families, who would have to travel significant distances. It would also run counter to the Council's commitment to inclusive local education and reducing reliance on external placements.

14. After careful consideration, the creation of a dedicated SEND Unit at The Royal Liberty School was identified as the most cost-effective, inclusive and sustainable solution to meet current and future needs within the borough.

IMPLICATIONS AND RISKS

Financial implications and risks:

Capital Implications

The estimated costs for delivering The Royal Liberty School SEND Unit is as follows:

School	SEND Unit	Cost
The Royal Liberty School	Communication and Interaction Needs – 30 place	£2,681,424

Funding by:

Unallocated SEND Capital grant (earmarked for this project) £2,681,424

The risk will be borne by the Academy. Clear contractual arrangements will be needed to ensure that both sides meet their obligations. Funding will be released to the school in line with clear delivery milestones. Details are included within the funding agreement – Appendix 3

Revenue Implications

SEND units in Havering are funded through a place led funding approach that aligns with the Government's SEND funding reforms introduced in April 2018. Revenue for placements comes from the local authority's DfE DSG High Needs allocation. Each agreed place is funded through a combination of 'place funding' and 'top-up funding', with the latter also met from the High Needs allocation.

For each place in the SEND unit, The Royal Liberty School will receive £30,000, comprising £10,000 place funding and £20,000 top-up funding (2025/26 rate).

The financial impact of creating additional local places is determined by the cost that would otherwise have been incurred if pupils required out-of-borough placements.

While a Unit place can be more costly than mainstream provision with individual support, it offers specialist expertise and tailored provision that improves outcomes and can reduce future demand for more intensive support. Crucially, the availability

of local places avoids the significantly higher costs associated with specialist settings outside the borough.

Comparative Costs and Savings

Provision	Per place	30 places cost	Cost saving
Royal Liberty SEN Unit Place cost	£30,000	£900,000	
Out of Borough Maintained Special School	£38,500	£1,155,000	£255,000
Non-maintained & Independent Special Schools	£64,080	£1,922,400	£1,022,400

Based on current placement averages, providing 30 local places at The Royal Liberty SEND Unit delivers substantial revenue mitigation compared with equivalent out-of-borough provision, with potential savings ranging from £255,000 to over £1 million depending on the alternative setting avoided.

Legal implications and risks:

Royal Liberty School is not a maintained school, but is managed and run by a Multi Academy Trust, SFAET Ltd.

The Local Authority's role, therefore, is limited to grant funding the building works to be commissioned by SFAET Ltd. The creation of the SEND unit at Royal Liberty has already been agreed by the DfE (Appendix 1) so there are no more governance steps which need to be taken.

The Local Authority has a duty under section 13 Education Act 1996 as follows:

"*13General responsibility for education.*
(1)A local authority shall (so far as their powers enable them to do so) contribute towards the spiritual, moral, mental and physical development of the community by securing that efficient primary education, and secondary education and, in the case of a local authority in England, further education, are available to meet the needs of the population of their area."

The grant funding of this SEND Unit will ensure that the Authority can meet its duties under this section.

The terms of the grant have been reviewed by the Council's legal team and are acceptable. The grant is ring fenced funding for the purposes of meeting SEND places as part of SEND Capital grant and will not be used by the Academy for any other purpose unconnected to the Project.

Grant drawdown is based on actual spend so the Council will only pay as much as the building costs up to the maximum amount. In the event the building costs more than provided for in the grant agreement, under the grant agreement the Council is

not bound to cover the excess, although it retains a discretion to do so. Any additional funding will be subject to a further decision.

The value of the grant is below the relevant threshold for the purposes of Procurement Act 2023 (PA23). The Trust is an exempted party for the purposes of PA 23 but when procuring must comply with its internal financial regulations. The Trust's financial regulations are published on its website and provide that when procuring, the Trust must adhere to best value principles.

For the reasons set out above, the Council may enter into the Grant funding arrangement.

Human Resources implications and risks:

The human resources implications for the Academy will be managed by the Trust. There is likely to be a need to recruit additional teaching and support staff and the Academy will undertake the recruitment and selection process in accordance with the Trust's policies and procedures

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 has been carried out and the proposal in this report has been assessed as having a positive impact on groups with a protected characteristic – Appendix 2

Health and Wellbeing implications and Risks

The new SEND Unit block with its classrooms, ancillary spaces and external areas will provide significantly better facilities for the SEND pupils and relevant staff. This

will positively impact the school experience for these pupils by improving the quality of the learning environment. There will be a change to the levels of staffing as the number of pupils will increase. The construction of the extension has been planned such that the children will be impacted as little as possible by the noise. This is fully considered within the contractor's programme. Construction traffic and general noise mitigation has been considered within the planning application and the appointed contractor will strictly adhere to these requirements. Moreover, the purpose of this building is to establish a calm and health-promoting environment for its users, recognising the crucial link with nature. The design, both inside and out, aims to incorporate natural elements, like using natural materials, and create special spaces such as quiet areas, sensory rooms, a soft play room, and a sensory garden. Additionally, the external spaces will feature soft landscaping to create outdoor retreat spaces and provide areas for outdoor learning. These outdoor elements are designed to enhance the overall well-being and experiences of the building's users

ENVIRONMENTAL AND CLIMATE CHANGE IMPLICATIONS AND RISKS

New school buildings face significant environmental and climate-related risks, including overheating, flooding, water scarcity, and carbon emissions. These risks must be addressed through sustainable design, climate adaptation, and resilience planning.

To reduce risks and environmental impact, schools are expected to implement:

- Climate Action Plans: By 2025, all schools should have a plan covering decarbonisation, resilience, biodiversity, and climate education.
- Sustainable Design Features:
  - Passive cooling and natural ventilation
  - Rainwater harvesting and greywater systems
  - Solar panels and low-carbon heating
  - Green roofs and permeable surfaces to manage runoff

All these sustainable features will be explored in the new SEND Unit.

Appendix 1 – Significant change approval letter

Appendix 2 - Royal Liberty SEND Unit EHIA

Appendix 3 - Grant Agreement – SFAET LTD

BACKGROUND PAPERS

The Royal Liberty School – Feasibility Study for a SEND Unit
SEN Hub The Royal Liberty School Romford Cost Plan

Department for Education

London Region
Regions Group
Sanctuary Buildings
Great Smith Street
London
SW1P 3BT

Email: eleanor.keech@education.gov.uk

Mark Neild
SFAET Ltd
The Royal Liberty School
Upper Brentwood Road
Romford
RM2 6HJ

3 July 2025

Dear Mark,

I am pleased to advise that Sean Hilditch, Head of Delivery for the North East London Team, has approved your request to make a significant change to The Royal Liberty School by introducing a new SEND Unit for up to 30 places with effect from 1 September 2025. This change is also approved retrospectively from 1 September 2024.

It should be noted that the significant change guidance makes it clear that implementing a significant change without following the significant change process could put trusts in breach of their funding agreement. This includes any changes instigated by the local authority. If there is a future breach, the Department will assess the suitability of issuing a Notice to Improve (NtI) or NtI Warning Letter.

Your Funding Agreement will need to be amended to formalise this change through a Deed of Variation. Once you have agreed and completed the required paperwork, a draft Deed of Variation should be sent to eleanor.keech@education.gov.uk for approval. Once the draft version of the Deed of Variation has been approved, you will need to produce one original copy that has been signed but not dated. You should then send the signed copy to eleanor.keech@education.gov.uk to be signed and sealed on behalf of the Secretary of State for Education. A scanned copy of the signed and sealed Deed of Variation will be returned to you via email.

Please do not hesitate to contact me with any further queries.

Yours sincerely,

Eleanor Keech
Delivery Officer
London Region, Regions Group

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Equality & Health Impact Assessment (EHIA)

Document control

Title of activity:	Proposal to establish a SEND unit for young people with Communication and Interaction needs at the Royal Liberty School.
Lead officer:	Pooneeta Mahadeo, School Organisation Manager, Starting Well
Approved by:	Trevor Cook, Assistant Director of Education, Starting Well
Version Number	**V0.1**
Date and Key Changes Made	11/09/2025
Scheduled date for next review:	

Did you seek advice from the Corporate Policy & Legal?	No
Did you seek advice from the Public Health team?	No
Does the EHIA contain any confidential or exempt information that would prevent you publishing it on the Council's website? See Publishing Checklist.	No

Please note that EHIAs are **public** documents and unless they contain confidential or sensitive commercial information must be made available on the Council's EqHIA webpage.

Please submit the completed form via e-mail to READI@havering.gov.uk Thank you.

1. Equality Health Impact Assessment Checklist

Please complete the following checklist to determine whether or not you will need to complete an EHIA and ensure you keep this section for your audit trail. If you have any questions, please contact READI@havering.gov.uk for advice from either the Corporate Diversity or Public Health teams. Please refer to **this Guidance** on how to complete this form.

About your activity

<table>
<tr><td>1</td><td>Title of activity</td><td colspan="4">Proposal to establish a Special Education Needs & Disabilities Unit for young people with Communication and Interaction needs at The Royal Liberty School.</td></tr>
<tr><td>2</td><td>Type of activity</td><td colspan="4">Strategy including project descriptions</td></tr>
<tr><td>3</td><td>Scope of activity</td><td colspan="4">The scope of the activity is to assess the impact of the establishment of a SEND unit for young people with Communication and Interaction needs at The Royal Liberty School.</td></tr>
<tr><td>4a</td><td>Are you changing, introducing a new, or removing a service, policy, strategy or function?</td><td>Yes</td><td colspan="2" rowspan="2">If the answer to <u>either</u> of these questions is ‘YES’ Continue to question 5.</td><td rowspan="3">If the answer to <u>all</u> of the questions (4a, 4b & 4c) is ‘NO’ Go to question 6.</td></tr>
<tr><td>4b</td><td>Does this activity have the potential to impact (either positively or negatively) upon people from different backgrounds?</td><td>Yes</td></tr>
<tr><td>4c</td><td>Does the activity have the potential to impact (either positively or negatively) upon any factors which determine people’s health and wellbeing?</td><td>Yes</td><td>Use the <u>Screening tool</u> before you answer this question.</td><td>If you answer ‘YES’ Continue to question 5.</td></tr>
<tr><td>5</td><td>If you answered YES:</td><td colspan="4">Please complete the EHIA in Section 2 of this document. Please see Appendix 1 for Guidance.</td></tr>
<tr><td>6</td><td>If you answered NO:</td><td colspan="4">Provide an explanation on why your activity does not require an EHIA. This is essential, in case the activity is challenged under the Equality Act 2010.

Keep this checklist for your audit trail.</td></tr>
</table>

Completed by:	Pooneeta Mahadeo, School Organisation Manager, Starting Well
Date:	11/09/2025

2. The EHIA – How will the strategy, policy, plan, procedure and/or service impact on people?

Background/context:
All Local Authorities including Havering have a statutory duty to provide sufficient schools places to all children that live in the borough. The Children and Young People Education Place Planning Plan 2023-2027 provides an overarching framework and evidence-base for identifying projects (and allocating funding to those projects) to implement as part of the Council's strategy of ensuring that there are sufficient school places to meet likely future demands. It sets out the council's policy for school organisation and plans to ensure there is sufficient capacity to meet demand for early years, primary, secondary, post-16, special school and alternative education provision across the borough. It also highlights the forecast number of children and young people in Havering and breaks this down to smaller geographical areas (planning areas within these) to show where there may be a need for more or fewer school places. The corporate plan for Havering 'The Havering you want to be part of', includes the priority to offer inclusive services that raise aspiration and meet the needs of our growing population of children, families, and young adults, including those in our care. Havering's SEND and Alternative Provision Strategy 2024 – 2028 emphasises the local authority's vision to ensure children, young people, and families have access to the same level of high-quality support and education, wherever they live in Havering. That children and young people with SEND can access the help and support they need to thrive and achieve within their local communities, that they can go to local education provision that meets their needs, access services and play an active role in the community close to where they live. While there are a number of schools operating a Communication and Interaction SEND Unit, additional secondary Communication and Interaction SEND Units are required in order to meet the growing number of secondary school aged pupils with C&I needs. A new Communication and Interaction SEND Unit at The Royal Liberty School will help meet key objectives from both the corporate and education visions for Havering.

Who will be affected by the activity?
• All parents/carers of pupils resident in Havering • All pupils attending a Havering school or College • All Education providers • Havering residents especially those who are residents near schools and in areas of population growth and projected demand of school places • All voluntary organisations who provide alternative education in the borough • All Governing body members of maintained schools • Local Governing members of academies • Members of Academy Trust boards • The Diocese of Brentwood and Chelmsford

<table>
<tr><td colspan="3">Protected Characteristic - Age: Consider the full range of age groups
If there is an impact on under 18s, how have you / will you ensure their views are gained to inform decision making?</td></tr>
<tr><td colspan="2">Please tick (✓) the relevant box:</td><td rowspan="4">Overall impact:
The SEND unit at Royal Liberty will have a positive impact on children and young people of school age living in Havering. This aligns with key priorities in our corporate plan such as “We support residents of all ages to live socially connected, independent and healthy lives. We engage with individuals, families and our partners to help residents reach their full potential” as we are trying to building new specialist education provision sites to cater for increased demand.

The SEND and AP Strategy sets out our shared vision and priorities to ensure that all children and young people with SEND achieve ambitious educational, health and care outcomes across ages 0-25 and in Preparing for Adulthood (PfA).

The new facility will enable young people with C&I needs to have their needs met through a flexible approach, tailored and adapted to the needs of each individual pupil. It will be for pupils who will require specialist support to enable them to access a mainstream secondary curriculum. It is proposed that the children will split their time between the mainstream school and having bespoke support within the Unit.

All of the above will positively impact on the quality of Early Year and school age care available within the borough, having a knock on effect to the parents of those children.

The SEND unit will provide new job opportunities, positively impacting on adults of a working age, giving a boost to the local economy.</td></tr>
<tr><td>Positive</td><td>✓</td></tr>
<tr><td>Neutral</td><td></td></tr>
<tr><td>Negative</td><td></td></tr>
<tr><td colspan="3">Evidence:
The Children and Young People Education Place Planning Plan highlights that ‘In Havering, we have seen an increase of 52% in the number of births between calendar years 2002 to 2016. This includes a 19% increase in the birth rate from 2012 to 2016. However since the birth rate peaked in 2016, we have seen a year on year reduction in the birth rate in Havering, with the birth rate decreasing by 11% between 2016 to 2021.’

The Plan details how we will ensure sufficiency of early years, primary, secondary, SEND, post 16 and alternative provision places for years to come.

The SEND Code of Practice: 0 to 25 years (2015) cites that “With high aspirations, and the right support, the vast majority of children and young people with SEND can go on to achieve successful long-term outcomes in adult life.” (Chapter 8: Preparing for Adulthood from the Earliest Years).</td></tr>
<tr><td colspan="3">Sources used:
• Birth data received from the ONS.
• School Roll Projections
• Consultation survey report on the draft The Children and Young People Education Place Planning Plan 2023-2027
• Census 2021
• The Havering you want to be part of; Our Corporate Plan for 2024-2027</td></tr>
</table>

- Havering's SEND and Alternative Provision Strategy 2024 – 2028
- The SEND Code of Practice: 0 to 25 years (2015)

Protected Characteristic - Disability: Consider the full range of disabilities; including physical, mental, sensory, progressive conditions and learning difficulties. Also consider neurodivergent conditions e.g. dyslexia and autism.

Please tick (✓) the relevant box:		**Overall impact:**
Positive	✓	The project will positively impact those with SEND and their families as the project is to build a new SEND unit, to meet increasing demand and to build inclusion within the community. Making appropriate local provision available is positive for children with special educational needs. Our Special Educational Needs, Disability (SEND) and Alternative Provision (AP) Strategy 2024 – 2028 outlines a number of proposed actions that will ensure that children, young people with SEND and their families have the right support at the right time including delivering an ongoing programme to create more SEND units in mainstream settings. There are currently five secondary schools (4 with SEND Units and 1 with a Specially Resourced Provision) totaling 84 places, of which 72 places cater for pupils with Communication and Interaction needs. Given the increasing numbers of Communication and Interaction pupils there is a need for additional secondary SEND Units to support these children within a mainstream school setting whilst receiving support from a specialist unit so that they can receive the best educational offer possible.
Neutral		
Negative		

Evidence:
The Children and Young People Education Place Planning Plan shows that there is an increase in the number of children in Havering within mainstream Primary and Secondary schools with an EHCP.

The number of Havering children and young people with EHCPs has risen by 71% between 2019 and 2024. The biggest growth has been seen among those whose main area of need is communication and interaction, including autism, and social, emotional and mental health needs.

With the continued growth of children with an EHCP, it is not sustainable to continue placing them in a mainstream setting and therefore it is essential that we implement further specialist SEND places, through the form of SEND units and special schools, whichever best meets the child's needs.

This aligns to our Vision for Children and Young People with SEND and in Alternative Provision, by working with children and young people with SEND, their families, and those whose role is to support them, we have established a shared vision for a SEND and AP system where every school and setting is confident, skilled, and enabled to effectively support our children with SEND.

Sources used:

- Special Educational Needs, Disability (SEND) and Alternative Provision (AP) Strategy 2024 – 2028
- SEND data
- The Children and Young People Education Place Planning Plan 2023-2027

Protected Characteristic – Sex / gender: Consider both men and women		
Please tick (✓) the relevant box:		**Overall impact:**
Positive	✓	The Royal Liberty School is a single sex school for boys. The school is oversubscribed therefore will cater to the increasing demand for boys in the SEND Unit. This will not impact girls as there are other co-educational secondary schools in the borough with SEND units that they can attend.
Neutral		
Negative		
Evidence: All our early years, primary, special and post-16 provision are co-educational. 4 out of the 18 secondary schools in the borough are single sex, (two boys and two girls).		
Sources used: • School Census data • Children and Young People Education Place Planning Plan 2023-2027		

Protected Characteristic – Ethnicity / race / nationalities: Consider the impact on different minority ethnic groups and nationalities		
Please tick (✓) the relevant box:		**Overall impact:** The overall impact on this protected characteristic is neutral. National legislation determines that education establishments including schools cannot discriminate on ethnicity or racial grounds. Creating additional SEND places will enable us to meet our vision of ensuring that every child has access to a good local school providing an opportunity for every young person in the borough to thrive, thereby securing outcomes that are above the national average.
Positive		
Neutral	✓	
Negative		
Evidence: According to the Census 2021, London remains the most ethnically diverse region of England and saw an 8.1% percentage point decrease in people who identified as White British from 44.9% in 2011 to 36.8% in 2021. Havering also followed this trend with a 16.8% percentage point decrease from 83.3% in 2011 to 66.5% in 2021. Havering and		

Bromley are the least diverse London Boroughs with both having a White British population of 66.5%. This compares with 74.4% for England, but is significantly higher than the 36.8% figure for London.

However, all our education provision is fully inclusive. Ethnicity or race is not a factor when considering the commissioning of education provision.

Sources used:

- School Census data
- Children and Young People Education Place Planning Plan 2023-2027
- Census 2021

Protected Characteristic – Religion / faith: Consider people from different religions or beliefs, including those with no religion or belief

Please tick (✓) the relevant box:	
Positive	✓
Neutral	
Negative	

Overall impact:
The overall impact on people from different religions or beliefs including those with no religion or belief is positive. National legislation determines that schools cannot discriminate on religious grounds.

Creating additional places including at The Royal Liberty School will enable us to meet our objective of providing access to a good local school for every Havering child.

Evidence:
The diversity across Havering is further demonstrated by the varying school sizes, governance arrangements and the number of voluntary aided schools. In addition, there are a number of Alternative Provision and Independent settings within Havering.

Sources used:

- School Roll Projections
- School Census data
- Consultation survey report on the draft Children and Young People Education Place Planning Plan 2023-2027

Protected Characteristic - Sexual orientation: Consider people who are heterosexual, lesbian, gay or bisexual

Please tick (✓) the relevant box:	
Positive	
Neutral	✓
Negative	

Overall impact:
The overall impact on this protected characteristic is neutral. All our education provision is fully inclusive.

Although the school is single-sex, the SEND unit will contribute to a broader culture of acceptance and inclusion, which benefits all students regardless of sexual orientation.

Evidence:

81% of our surveyed participants who responded to our equality and diversity monitoring form during the consultation for our CYPEPPP stated that they were heterosexuals. No issues regarding sexual orientation were raised during the consultation.

Sexual orientation is not considered as a factor when commissioning educational provision or in the determination of sufficiency of education provision. According to the ONS Census 2021, the majority of Havering residents aged 16 and above (91%) identify as straight or heterosexual. In total, 2% identify with one of the LGB+ orientations ("Gay or Lesbian", "Bisexual" or "Other sexual orientation"). 7% of those asked did not answer.

Havering has the lowest proportion of residents aged 16 and over in London who identify as LGB+ orientation.

Sources used:

- Consultation survey report on the draft Children and Young People Education Place Planning Plan 2023-2027
- Census 2021

Protected Characteristic - Gender reassignment: Consider people who are seeking, undergoing or have received gender reassignment surgery, as well as people whose gender identity is different from their gender at birth

Please tick (✓) the relevant box:		**Overall impact:**
Positive		The overall impact on this protected characteristic is neutral. All our education provision is fully inclusive. Ensuring there is sufficient capacity to meet demand for early years, primary, secondary, post-16 and special school places across the borough will enable us fulfil our statutory duty.
Neutral	✓	
Negative		

Evidence:

91% of all respondents who completed the CYPEPPP equality monitoring form identified that their current gender was the same assigned at birth.

Gender reassignment is not considered as a factor when commissioning educational provision or in the determination of sufficiency of education provision. According to the ONS Census 2021, the majority of Havering residents aged 16 and above have retained their gender identity as registered at birth. In total, less than 1% identify with gender identity being different from the one registered at birth. Within London, Havering has the 5th lowest proportion of residents aged 16 and over reporting that the gender that they identify with now is different to their sex registered at birth.

Royal Liberty has a Transgender Guidance Policy completed with Havering Safeguarding Children Partnership aiming to protect and promote the positive inclusion of transgender individuals within the school environment.

Sources used:

- Consultation survey report on the draft Children and Young People Education Place Planning Plan 2023-2027
- Census 2021
- Success For All Educational Trust Equality Policy – Transgender Guidance

Protected Characteristic – Marriage / civil partnership: Consider people in a marriage or civil partnership

Please tick (✓) the relevant box:		**Overall impact:**
Positive		The overall impact on this protected characteristic is neutral. All our education provision is fully inclusive, Marriage/ civil partnerships will have no bearing on the SEND unit at Royal Liberty. Ensuring there is sufficient capacity to meet demand for early years, primary, secondary, post-16 and special school places across the borough will enable us fulfil our statutory duty.
Neutral	✓	
Negative		

Evidence:
Majority of respondents (62%) who completed the Children and Young People Education Place Planning Plan 2023-2027 equalities monitoring form stated that they were in a marital relationship.

No issues regarding marriage/civil partnership were raised during the consultation.

For Havering as a whole, we find the following:

Figure 19: Census 2021 data on legal partnership status for Havering Residents

Legal Partnership Status	% Of Havering Residents
Never married and never registered a civil partnership	36.9
Married or in a registered civil partnership	47.0
Separated, but still legally married or still legally in a civil partnership	1.9
Divorced or civil partnership dissolved	7.8
Widowed or surviving civil partnership partner	6.4

Sources used:

- Consultation survey report on the draft the Children and Young People Education Place Planning Plan 2023-2027
- Census 2021

Protected Characteristic - Pregnancy, maternity and paternity: Consider those who are pregnant and those who are taking maternity or paternity leave

Please tick (✓) the relevant box:		**Overall impact:**
Positive		The overall impact on this protected characteristic is neutral. All our education provision is fully inclusive.

Neutral	✓	Ensuring there is sufficient capacity to meet demand for early years, primary, secondary, post-16 and special school places across the borough will enable us fulfil our statutory duty.
Negative		

Evidence:
2% of the surveyed the Children and Young People Education Place Planning Plan 2023-2027 participants were either pregnant or have given birth in the last 26 weeks. No issues regarding pregnancy, undertaking maternity or paternity leave were raised during the consultation.

Being pregnant or undertaking maternity/ paternity leave is not considered as a factor when commissioning educational provision or in the determination of sufficiency of education provision.

Sources used:

- Consultation survey report on the draft the Children and Young People Education Place Planning Plan2023-2027

Socio-economic status: Consider those who are from low income or financially excluded backgrounds

Please tick (✓) the relevant box:		**Overall impact:** The overall impact on those who are from low income or financially excluded backgrounds is positive Creating more SEND places to meet demand through this SEND unit will help us realise our vision to ensure the growing SEND need is met and that every child has access to a great education.
Positive	✓	
Neutral		
Negative		

Evidence:
Social mobility remains a serious issue and the changes in Havering's population has historically been influenced by increased births, housing developments and economic migration. The Council's provision of school places, and, in particular, SEND places for which there is a growing demand, must also respond to meet the changing needs of residents.

The Joseph Rowntree Foundation report on 'Special educational needs and their link to poverty' explores the links between SEND and poverty. The report shows that poverty is both a cause and an effect of SEND.

Therefore, supporting all phases of our education provision to develop a strong strategy and increasing access to only good/outstanding provision will ensure that all children have the best possible start in life, which will enable them achieve and reach their full potential.

Access to adequate, affordable and high quality childcare (pre-school and school age) provision can play a key role in children's development. Where it enables increased parental employment rates of low income households, it may also help to reduce income inequalities.

Over 7,000 children are estimated to be living in poverty in Havering. However, Havering is among the London boroughs with the lowest proportion of children living in poverty (16%). This rate is also significantly lower than the England average (17%). Within Havering [analysis shows] a high proportion of children living in poverty are located in the North and South in areas considered as relatively more deprived.

Growing up in poverty damages children's health and well-being, adversely affecting their future health and life chances as adults. Ensuring a good environment in childhood, especially early childhood, is important. A considerable body of evidence links adverse childhood circumstances to poor child health outcomes and future adult ill health.

Sources used:

- Joseph Rowntree Foundation – 'Special educational needs and their link to poverty'
- Havering Demographic Profile Joint Strategic Needs Assessment 2023-2024

Health & Wellbeing Impact:

Consider both short and long-term impacts of the activity on a person's physical and mental health, particularly for disadvantaged, vulnerable or at-risk groups. Can health and wellbeing be positively promoted through this activity?

Please tick (✓) all the relevant boxes that apply:	
Positive	✓
Neutral	
Negative	

Overall impact:
The overall impact on health and wellbeing is positive. The implementation of a SEND unit at The Royal Liberty School ensures there are sufficient school places available for children and young people in the right areas and at the right time to meet demand, whilst maintaining a focus on high quality education.

The SEND Unit will be staffed by a team of support staff with knowledge and experience of working with young people with Communication and Interaxtion, led by qualified teaching staff with recognised additional qualifications. The purpose of the unit will be to support these children to achieve their academic potential, attending a mainstream secondary school whilst receiving specialist support from the SEND Unit.

Do you consider that a more in-depth HIA is required as a result of this brief assessment? Please tick (✓) the relevant box

Yes ☐ **No** ✓

Evidence:
The Royal Liberty SEND Unit Consultation Feedback Report highlights:

- Strong support from parents and professionals for the unit's potential to meet unmet needs.
- Recognition of the emotional and developmental benefits of specialist support within a mainstream setting.
- Concerns about mental health and exclusion being addressed through tailored provision.

Havering Children's Services vision is clear: we are here to enable all children and families in the borough to lead happy, healthy lives, where all children get a good start in life and live in a borough where families and communities look after themselves and each other.

The SEND Code of Practice: 0 to 25 years (2015) sites that "With high aspirations, and the right support, the vast majority of children and young people with SEND can go on to achieve successful long-term outcomes in adult life." (Chapter 8: Preparing for Adulthood from the Earliest Years).

Sources used:

- The Children and Young People Education Place Planning Plan 2023-2027
- The SEND Code of Practice: 0 to 25 years (2015)
- The Royal Liberty SEND Unit Consultation Feedback Report

3. Health & Wellbeing Screening Tool

Will the activity / service / policy / procedure affect any of the following characteristics? Please tick/check the boxes below

The following are a range of considerations that might help you to complete the assessment.

Lifestyle YES ☐ NO x	**Personal circumstances YES ☒ NO ☐**	**Access to services/facilities/amenities YES ☒ NO ☐**
☐ Diet	☐ Structure and cohesion of family unit	☒ to Employment opportunities
☐ Exercise and physical activity	☒ Parenting	☐ to Workplaces
☐ Smoking	☒ Childhood development	☐ to Housing
☐ Exposure to passive smoking	☒ Life skills	☐ to Shops (to supply basic needs)
☐ Alcohol intake	☐ Personal safety	☐ to Community facilities
☐ Dependency on prescription drugs	☒ Employment status	☐ to Public transport
☐ Illicit drug and substance use	☐ Working conditions	☒ to Education
☐ Risky Sexual behaviour	☒ Level of income, including benefits	☒ to Training and skills development
☐ Other health-related behaviours, such as tooth-brushing, bathing, and wound care	☒ Level of disposable income	☐ to Healthcare
	☐ Housing tenure	☒ to Social services
	☐ Housing conditions	☒ to Childcare
	☒ Educational attainment	☐ to Respite care
	☒ Skills levels including literacy and numeracy	☐ to Leisure and recreation services and facilities
Social Factors YES ☒ NO ☐	**Economic Factors YES ☒ NO ☐**	**Environmental Factors YES ☒ NO ☐**
☒ Social contact	☒ Creation of wealth	☐ Air quality
☒ Social support	☒ Distribution of wealth	☐ Water quality
☐ Neighbourliness	☐ Retention of wealth in local area/economy	☐ Soil quality/Level of contamination/Odour
☒ Participation in the community	☐ Distribution of income	☒ Noise levels
☒ Membership of community groups	☐ Business activity	☐ Vibration
☐ Reputation of community/area	☒ Job creation	☐ Hazards
☐ Participation in public affairs	☒ Availability of employment opportunities	☐ Land use
☐ Level of crime and disorder	☒ Quality of employment opportunities	☐ Natural habitats
☐ Fear of crime and disorder	☒ Availability of education opportunities	☐ Biodiversity
☐ Level of antisocial behaviour	☒ Quality of education opportunities	☐ Landscape, including green and open spaces
☐ Fear of antisocial behaviour	☒ Availability of training and skills development opportunities	☒ Townscape, including civic areas and public realm
☐ Discrimination	☒ Quality of training and skills development opportunities	☐ Use/consumption of natural resources
☐ Fear of discrimination	☐ Technological development	☐ Energy use: CO2/other greenhouse gas emissions
☐ Public safety measures	☒ Amount of traffic congestion	☐ Solid waste management
☐ Road safety measures		☐ Public transport infrastructure

4. Outcome of the Assessment

The EHIA assessment is intended to be used as an improvement tool to make sure the activity maximises the positive impacts and eliminates or minimises the negative impacts. The possible outcomes of the assessment are listed below and what the next steps to take are:

Please tick (✓) what the overall outcome of your assessment was:

	1. The initial screening exercise showed a strong indication that there will be no impacts on people and need to carry out an EHIA. 2. The EHIA identified **no significant concerns** OR the identified **negative concerns** have already been **addressed**	→	**Proceed with implementation** of your activity
	3. The EHIA identified some **negative impact** which still needs **to be addressed**	→	**COMPLETE SECTION 5:** **Complete action plan** with measures to mitigate the and finalise the EHIA
	4. The EHIA identified some **major concerns** and showed that it is **impossible to diminish negative impacts** from the activity to an acceptable or even lawful level	→	**Stop and remove** the activity or **revise** the activity **thoroughly.** **Complete an EHIA on the revised proposal.**

5. Action Plan

The real value of completing an EHIA comes from identifying the actions that can be taken to eliminate/minimise **negative** impacts and enhance/optimise positive impacts. In this section you should list the specific actions that set out how you will mitigate or reduce any **negative** equality and/or health & wellbeing impacts, identified in this assessment. Please ensure that your action plan is: more than just a list of proposals and good intentions; if required, will amend the scope and direction of the change; sets ambitious yet achievable outcomes and timescales; and is clear about resource implications.

Protected characteristic / health & wellbeing impact	Identified Negative or Positive impact	Recommended actions to mitigate Negative impact* or further promote Positive impact	Outcomes and monitoring**	Timescale	Lead officer
Disability	Positive	Further SEND school places through delivery of more SEND units, APs and special schools. This can happen either through new builds or expansion.	Monitor projected increase demand in SEND, more SEND places will be made available in Havering accordingly. Then track number of new schools, classrooms, childcare places.	2027/28	Marcus Bennett
SEND Support Quality	Negative	Some consultation responses raised concerns about quality of staff teaching and SEND support delivery at Royal Liberty.	Royal Liberty mention in their policies that staff undergo continuous professional development and that they already employ SEND specialist staff. The SEND team at Havering review practice within schools throughout the Borough. The progress of pupils within the SEND unit would need to be tracked against EHCP outcomes and using EDUKEY (as mentioned in the consultation report).	2027/28	Marcus Bennett/ The Royal Liberty School

Impact on Non-SEND Pupils	Negative	Concerns about disruption to mainstream pupils.	The SEND Unit will be specifically for students who are unable to access a mainstream curriculum owing to their SEND needs. Instead they will receive specialist teaching and a bespoke curriculum tailored specifically for their needs. This will mirror our mainstream curriculum as far as possible. They will have access to some mainstream teaching in subjects such as PE, DT and art but will be taught in much smaller groups as suitable for their needs. Royal Liberty will continue to monitor mainstream pupil outcomes and classroom dynamics post-implementation.	2027/28	The Royal Liberty School
Resident Engagement and Communication	Negative	Some residents felt excluded from the consultation process.	Royal Liberty need to engage with residents more going forward, they need to look into a community engagement plan.	2027/28	The Royal Liberty School
Traffic and Environmental Justice	Neutral	Some residents have raised concerns about traffic.	A transport Impact Assessment will be undertaken as part of the planning application and any mitigating issues will be addressed.	2027/28	The Royal Liberty School

Add further rows as necessary

***** You should include details of any future consultations and any actions to be undertaken to mitigate negative impacts.

** Monitoring: You should state how the impact (positive or negative) will be monitored; what outcome measures will be used; the known (or likely) data source for outcome measurements; how regularly it will be monitored; and who will be monitoring it (if this is different from the lead officer).

6. Review

In this section you should identify how frequently the EHIA will be reviewed; the date for next review; and who will be reviewing it.

Review:
The Royal Liberty School, the proposed establishment of a SEND unit for young people with Communication and Interaction needs EHIA will be reviewed within 2 years.

Scheduled date of review: December 2027

Lead Officer conducting the review: Pooneeta Mahadeo, School Organisation Manager, Starting Well.

**Expand box as required*

Please submit the completed form via e-mail to READI@havering.gov.uk
Thank you.

Based on the consultation feedback, the following actions will be taken:
- Address safeguarding concerns by ensuring safe spaces and emotional regulation support.
- Ensure staff qualifications include specialist SEND training and ongoing professional development.
- Monitor and mitigate impact on mainstream pupils through inclusive practices and small group integration.
- Collaborate with local authorities to address traffic and environmental concerns, especially around drop-off zones.
- Improve community engagement by providing timely updates and involving stakeholders in planning.

This EHIA will be reviewed annually. The next review is scheduled for September 2026.
Review will include assessment of actions taken in response to consultation feedback, including:
- Safeguarding concerns
- Staff qualifications and training
- Impact on mainstream pupils
- Traffic and environmental issues
- Community engagement and transparency

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DATED

DD[DD] MMM YYYY

AGREEMENT FOR THE PROVISION OF GRANT FUNDING RELATING TO SCHOOLS CAPITAL BUILDING PROGRAMME

BETWEEN

MAYOR AND BURGESSES OF THE LONDON BOROUGH OF HAVERING

AND

SFAET
(SUCCESS FOR ALL EDUCATION TRUST)

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SCHEDULES

1. THE PROJECT 4

THIS DEED is dated DD^DD MMM YYYY

PARTIES

(1) **MAYOR AND BURGESSES OF THE LONDON BOROUGH OF HAVERING** of Havering Town Hall Main Road Romford RM1 3BB (**Funder**)

1. **Success For All Education Trust Ltd, The Royal Liberty School, Upper Brentwood Road, Romford, RM2 6HJ (Recipient)**

2. **Company number 07689980**

Background

(A) The Funder has agreed to pay the Grant to the Recipient to assist it in carrying out the Project.

(B) This Agreement sets out the terms and conditions on which the Grant is made by the Funder to the Recipient.

(C) These terms and conditions are intended to ensure that the Grant is used for the purpose for which it is awarded.

(D) The Funder is providing the Grant pursuant to its powers which prescribes:

i. the Funder is a Local Education Authority within the meaning of Section 12 of The Education Act 1996 and has a general responsibility for education under Sections 13 and 14 of the Act. Such obligations include under Section 16 the provision and maintenance of primary and secondary education establishments and Nurseries under Section 17; and

ii. section 137(3)(a) of the Local Government Act 1972 (the **LGA**) which provides that 'a local authority may incur expenditure on contributions to any of the following funds, that is to say (a) the funds of any charitable body in furtherance of its work in the United Kingdom; and (c) section 111 of the LGA which states 'a local authority shall have power to do anything (whether or not involving the expenditure, borrowing or lending of money or the acquisition or disposal of any property or rights) which is calculated to facilitate, or is conducive or incidental to the discharge of any of their functions for the implementation of the Project. The expenditure and activities which are to be supported by the Grant Funding in relation to the Project are set out in Schedules 1, 2 and 3.

(E) The Grant is ring fenced funding to support the provision of places for children and young people (CYP) with special educational needs and disabilities (SEND) as part of the High Needs Provision Capital grant and will not be used by the Recipient for any other purpose unconnected to the Project for which the Grant has been approved by the Funder.

AGREED TERMS

1. DEFINITIONS

In this Agreement, the following terms shall have the following meanings:

Approved Purposes: means the activities and the expenditure set out in Schedules 1 and 3 respectively to this Agreement

Bribery Act: the Bribery Act 2010 and any subordinate legislation made under that Act from time to time together with any guidance or codes of practice issued by the relevant government department concerning the legislation.

Commencement Date: DD[DD] MMM YYYY **Completion Date:** DD[DD] MMM YYYY

Data Protection Legislation: means the Data Protection Act 2018, the UK GDPR and any replacement legislation coming into effect from time to time including (without limitation) the UK GDPR, together with any codes of practice or other guidance issued by any competent regulatory authority.

Event of Default - shall mean one of the events listed in clause 8;

Governing Body: the governing body of the Recipient including its directors or trustees.

Grant: the sum of **£2,681,424.00** to be paid to the Recipient in accordance with this Agreement as set out in schedule 2.

Grant Period: the period for which the Grant is awarded starting on the Commencement Date and ending Completion Date.

Intellectual Property Rights: all patents, copyrights and design rights (whether registered or not) and all applications for any of the foregoing and all rights of confidence and Know-How however arising for their full term and any renewals and extensions.

Know-How: information, data, know-how or experience whether patentable or not and including but not limited to any technical and commercial information relating to research, design, development, manufacture, use or sale.

Prohibited Act: means:

(a) Offering, giving or agreeing to give to any servant of the Funder any gift or consideration of any kind as an inducement or reward for:

  (i) doing or not doing (or for having done or not having done) any act in relation to the obtaining or performance of this Agreement or any other contract with the Funder; or

  (ii) showing or not showing favour or disfavour to any person in relation to this Agreement or any other contract with the Funder; or

(b) entering into this Agreement or any other contract with the Funder where a commission has been paid or has been agreed to be paid by the Recipient or on its behalf, or to its knowledge, unless before the relevant contract is entered into particulars of any such commission and of the terms and

conditions of any such contract for the payment thereof have been disclosed in writing to the Funder;

(c) Committing any offence:

(i) under the Bribery Act;

(ii) under legislation creating offences in respect of fraudulent acts; or

(iii) at common law in respect of fraudulent acts in relation to this Agreement or any other contract with the Funder; or

(d) defrauding or attempting to defraud or conspiring to defraud the Funder.

Project: the project described in Schedule 1 with approved Contract and documents at Schedule 3.

Project Manager: the individual who has been nominated to represent the Funder for the purposes of this Agreement.

UK GDPR: has the meaning given to it in section 3(10) (as supplemented by section 205(4)) of the Data Protection Act 2018

2. PURPOSE OF GRANT

2.1. The Recipient shall use the Grant only for the delivery of the Project and in accordance with the terms and conditions set out in this Agreement. The Grant shall not be used for any other purpose without the prior written agreement of the Funder.

2.2. The Recipient shall not make any significant change to the Project without the Funder's prior written agreement.

2.3. Where the Recipient intends to apply to a third party for other funding for the Project, it will notify the Funder in advance of its intention to do so and, where such funding is obtained, it will provide the Funder with details of the amount and purpose of that funding. The Recipient agrees and accepts that it shall not apply for duplicate funding in respect of any part of the Project or any related administration costs that the Funder is funding in full under this Agreement without prior Agreement of the Funder.

2.4. Where duplicate funding as per clause 2.3 is sourced, then that amount will be returned to the Funder as unrequired duplicate funding in relation to this Project. Such duplicate funding cannot be retained for alternative use or significant expansion of the project without the Funders specific written agreement.

3. PAYMENT OF GRANT

3.1. Subject to clause 3.2 the Funder shall pay the Grant to the Recipient in appropriate instalments, based on an agreed schedule supported by appropriate project milestones. The funding will be released in a manner to ensure that the project can

be completed without creating undue cash flow difficulties but will be based on completion of agreed elements at each stage in accordance with Schedule 2.

3.2. No Grant shall be paid unless and until the Funder is satisfied that such payment will be used for proper expenditure in the delivery of the Project.

3.3. The amount of the Grant shall not be increased in the event of any overspend by the Recipient in its delivery of the Project save for any reasonable expenditure the Recipient has appropriate documentation to support which arise in connection to the Project and which must be provided to the Funder to exercise their discretion in allocating any further Grant.

3.4. The Grant shall be paid into a bank account in the name of the Recipient which must be an ordinary business bank account.

3.5. The Recipient shall not transfer any part of the Grant to bank accounts which are not ordinary business accounts within the clearing bank system, without the prior written consent of the Funder.

3.6. The Recipient shall promptly repay to the Funder any money incorrectly paid to it either as a result of an administrative error or otherwise. This includes (without limitation) situations where either an incorrect sum of money has been paid or where Grant monies have been paid in error before all conditions attaching to the Grant have been complied with by the Recipient.

4. USE OF GRANT

4.1. The Grant shall be used by the Recipient for the delivery of the Project in accordance with the agreed budget set out in Schedule 2.

4.2. The Recipient shall not use the Grant to:

(a) make any payment to members of its Governing Body;

(b) purchase buildings or land; or

(c) pay for any expenditure commitments of the Recipient entered into before the Commencement Date save for those properly attributed to the Project,

unless this has been approved in writing by the Funder.

4.3. The Recipient shall not spend any part of the Grant on the delivery of the Project after the Grant Period.

4.4. Should any part of the Grant remain unspent at the end of the Grant Period, the Recipient shall ensure that any unspent monies are returned to the Funder.

4.5. Any liabilities arising at the end of the Project including any redundancy liabilities for staff employed by the Recipient to deliver the building Project must be

managed and paid for by the Recipient using other resources of the Recipient. There will be no additional funding available from the Funder for this purpose.

5. ACCOUNTS AND RECORDS

5.1. The Grant shall be shown in the Recipient's accounts as a restricted fund and shall not be included under general funds.

5.2. The Recipient shall keep separate, accurate and up-to-date accounts and records of the receipt and expenditure of the Grant monies received by it.

5.3. The Recipient shall keep all invoices, receipts, and accounts and any other relevant documents relating to the expenditure of the Grant for a period of at least six years following receipt of any Grant monies to which they relate. The Funder shall have the right to review, at the Funder's reasonable request, the Recipient's accounts and records that relate to the expenditure of the Grant and shall have the right to take copies of such accounts and records.

5.4. The Recipient shall provide the Funder with a copy of its annual accounts within six months (or such lesser period as the Funder may reasonably require) of the end of the relevant financial year in respect of each year in which the Grant is paid.

5.5. The Recipient shall comply and facilitate the Funder's compliance with all statutory requirements as regards accounts, audit or examination of accounts, annual reports and annual returns applicable to itself and the Funder.

6. MONITORING AND REPORTING

6.1. The Recipient shall closely monitor the delivery and success of the Project throughout the Grant Period to ensure that the aims and objectives of the Project are being met and that this Agreement is being adhered to.

6.2. The Recipient shall provide the Funder with a financial report and an operational report on its use of the Grant and delivery of the Project every quarter and in such formats as the Funder may reasonably require. The Recipient shall provide the Funder with each report within three months of the last day of the quarter to which it relates.

6.3. Where the Recipient has obtained funding from a third party for its delivery of part of the Project, the Recipient shall include the amount of such funding in its financial reports together with details of what that funding has been used for.

6.4. Along with its first quarterly financial report, the Recipient shall provide the Funder with a risk register and insurance review in the format provided by the Funder. The Recipient shall address the health and safety of its staff in the risk register.

6.5. The Recipient shall on request provide the Funder with such further information, explanations and documents as the Funder may reasonably require in order for it to establish that the Grant has been used properly in accordance with this Agreement.

6.6. The Recipient shall permit any person authorised by the Funder such reasonable access to its employees, agents, premises, facilities and records, for the purpose of discussing, monitoring and evaluating the Recipient's fulfilment of the conditions of this Agreement and shall, if so required, provide appropriate oral or written explanations from them.

6.7. The Recipient shall permit any person authorised by the Funder for the purpose to visit the Recipient once every [period to be agreed and will vary from project to project] to monitor the delivery of the Project. Where, in its reasonable opinion, the Funder considers that additional visits are necessary to monitor the Project, it shall be entitled to authorise any person to make such visits on its behalf.

6.8. The Recipient shall provide the Funder with a final report on completion of the Grant Period which shall confirm whether the Project has been successfully and properly completed.

7. PROCUREMENT

7.1. Each party (the **"Procuring Party"**) shall comply with all applicable procurement legislation and any implementing measures, any other applicable legislation and both parties' internal procurement rules in connection with the procurement of any assets, works or services required in relation to the Project.

7.2. The Procuring Party shall promptly provide to the other party such information as the other may reasonably request to demonstrate compliance with this clause 7.

8. BREACH OF THE GRANT CONDITIONS, AUTHORITY CLAWBACK POWERS AND TERMINATION

8.1. If the Recipient expends any part of the Grant Funding other than in accordance with this Agreement the Funder reserves the right to claw back that part of the Grant Funding. The Funder may however decide in its absolute discretion not to ask the Recipient to repay such part the Grant Funding.

8.2. Each party will notify the other party if:

(a) an Event of Default occurs, whether or not within that party's control; or

(b) any event occurs which has a reasonable likelihood of becoming an Event of Default,

as soon as reasonably practicable after that party becomes aware of the same.

8.3. The Funder may terminate this Agreement and stop any future instalments of the Grant Funding if any of the following Events of Default occurs where the Recipient:

(a) no longer operates, or is declared insolvent or placed into receivership or liquidation;

(b) has given the Funder fraudulent, materially incorrect or materially misleading information;

(c) acted negligently in any significant matter or fraudulently;

(d) knowingly withhold material information that is relevant to the Project or to this Agreement;

(e) fails to expend the Grant Funding or to comply with any term of this Agreement, except where such failure is the result of a breach by the Funder of the terms of this Agreement; or

(f) its employees or agents act illegally or negligently during the Grant Funding Period, which the Funder reasonably believes is likely to have a materially adverse effect on the Recipient's ability to fulfil its obligations under this Agreement;

(g) Fails to provide outcomes in accordance with this Agreement;

8.4. The Funder has agreed to invest in the construction of a SEND Unit at the Recipient School to accommodate 30 additional pupils with Communication & Interaction needs. This investment is to allow this construction work to be undertaken at the Academy School. Should the Recipient wish for any reason to reduce the pupil admission number (PAN) for the SEND Unit or cease to provide the service within the SEND Unit for reasons within its control within the period specified below a percentage of the total Grant shall be repaid to the Funder as follows:

Reduction of SEND Unit PAN	% of Grant repayable to the Funder
- Within 1 year	- 100%
- Within 2 years	- 80%
- Within 3 years	- 60%
- Within 4 years	- 40%

-	Within 5 years	-	20%
-	After 5 years	-	0%

8.5 The Recipient will be responsible for the maintenance and running costs associated with any new build. These costs will be met by the Academy or funds as may be provided by the Education Finance Authority for this purpose.

9. BUILDING MAINTENANCE

9.1. As this is a new build procured and managed by the Recipient Academy the Parties do not anticipate that there should be any major maintenance issues in the first 10 years.

9.2. The Recipient is procuring, managing and administering the building project and shall also ensure that the building meets all of the design requirements indicated in Schedule 1. This will include appropriate snagging and correction of any defects at the end of the initial 1 year defects period. Any defects from the new build shall be dealt with properly and in a timely manner.

9.3. The Recipient shall notify the DfE once ownership/leasehold of the building transfers to the Recipient, for maintenance requirements to be suitably adjusted. Maintenance funds within delegated budgets are determined by the DfE based on the Schools Capacity Return (SCAP); it will be the Recipient's responsibility to inform the DfE that they have increased their teaching space and procure any

necessary funding independently from the Funder. For the avoidance of doubt, there will be no additional building maintenance payments from the Funder.

10. ACKNOWLEDGMENT AND PUBLICITY

10.1. The Recipient shall acknowledge the Grant in its annual report and accounts, including an acknowledgement of the Funder as the source of the Grant.

10.2. The Recipient shall not publish any material referring to the Project or the Funder without the prior written agreement of the Funder. The Recipient shall acknowledge the support of the Funder in any materials that refer to the Project and in any written or spoken public presentations about the Project. Such acknowledgements (where appropriate or as requested by the Funder) shall include the Funder's name and logo (or any future name or logo adopted by the Funder) using the templates provided by the Funder from time to time.

10.3. In using the Funder's name and logo, the Recipient shall comply with all reasonable branding guidelines issued by the Funder from time to time.

10.4. The Recipient agrees to participate in and co-operate with promotional activities relating to the Project that may be instigated and /or organised by the Funder.

10.5. The Funder may acknowledge the Recipient's involvement in the Project as appropriate without prior notice.

10.6. The Recipient shall comply with all reasonable requests from the Funder to facilitate visits, provide reports, statistics, photographs and case studies that will assist the Funder in its promotional and fundraising activities relating to the Project.

11. INTELLECTUAL PROPERTY RIGHTS

11.1. The Funder and the Recipient agree that all rights, title and interest in or to any information, data, reports, documents, procedures, forecasts, technology, Know-How and any other Intellectual Property Rights whatsoever owned by either the Funder or the Recipient before the Commencement Date or developed by either party during the Grant Period, shall remain the property of that party.

11.2. Where the Funder has provided the Recipient with any of its Intellectual Property Rights for use in connection with the Project (including without limitation its name and logo), the Recipient shall, on termination of this Agreement, cease to use such Intellectual Property Rights immediately and shall either return or destroy such Intellectual Property as requested by the Funder.

12. CONFIDENTIALITY

12.1. Subject to clause 13 (Freedom of Information), each party shall during the term of this Agreement and thereafter keep secret and confidential all Intellectual Property Rights or Know-How or other business, technical or commercial information disclosed to it as a result of the Agreement and shall not disclose the same to any person save to the extent necessary to perform its obligations in accordance with the terms of this Agreement or save as expressly authorised in writing by the other party.

12.2. The obligation of confidentiality contained in this clause shall not apply or shall cease to apply to any Intellectual Property Rights, Know-How or other business, technical or commercial information which:

(a) at the time of its disclosure by the disclosing party is already in the public domain or which subsequently enters the public domain other than by breach of the terms of this Agreement by the receiving party;

(b) is already known to the receiving party as evidenced by written records at the time of its disclosure by the disclosing party and was not otherwise acquired by the receiving party from the disclosing party under any obligations of confidence; or

(c) is at any time after the date of this Agreement acquired by the receiving party from a third party having the right to disclose the same to the receiving party without breach of the obligations owed by that party to the disclosing party.

13. FREEDOM OF INFORMATION

13.1. The Recipient acknowledges that the Funder is subject to the requirements of the Freedom of Information Act 2000 (**FOIA**) and the Environmental Information Regulations 2004 (**EIRs**).

13.2. The Recipient shall:

(a) provide all necessary assistance and cooperation as reasonably requested by the Funder to enable the Funder to comply with its obligations under the FOIA and EIRs;

(b) transfer to the Funder all requests for information relating to this agreement that it receives as soon as practicable and in any event within 2 working days of receipt;

(c) provide the Funder with a copy of all information belonging to the Funder requested in the request for information which is in its possession or control in the form that the Funder requires within 5 working days (or such other period as the Funder may reasonably specify) of the Funder's request for such information; and

(d) not respond directly to a request for information unless authorised in writing to do so by the Funder.

13.3. The Recipient acknowledges that the Funder may be required under the FOIA and EIRs to disclose information without consulting or obtaining consent from the Recipient. The Funder shall take reasonable steps to notify the Recipient of a request for information (in accordance with the Secretary of State's section 45 Code of Practice on the Discharge of the Functions of Public Authorities under Part 1 of the FOIA) to the extent that it is permissible and reasonably practical for it to do so but (notwithstanding any other provision in this agreement) the Funder shall be responsible for determining in its absolute discretion whether any information is exempt from disclosure in accordance with the FOIA and/or the EIRs.

14. DATA PROTECTION

14.1. The Recipient shall (and shall procure that any of its staff involved in connection with the activities under the Agreement shall) comply with any notification requirements under the Data Protection Legislation and both Parties will duly observe all their obligations under the DPA, which arise in connection with the Agreement.

15. ANTI-DISCRIMINATION

15.1. The Recipient shall not unlawfully discriminate within the meaning and scope of any law, enactment, order, or regulation relating to discrimination (whether in race, gender, religion, disability, sexual orientation, age or otherwise) in employment.

15.2. The Recipient shall take all reasonable steps to secure the observance of clause 15.1 by all servants, employees or agents of the Recipient and all suppliers and sub-contractors engaged on the Project.

16. HUMAN RIGHTS

16.1. The Recipient shall (and shall use its reasonable endeavours to procure that its staff shall) at all times comply with the provisions of the Human Rights Act 1998 in the performance of this Agreement as if the Recipient were a public body (as defined in the Human Rights Act 1998).

16.2. The Recipient shall undertake, or refrain from undertaking, such acts as the Funder requests so as to enable the Funder to comply with its obligations under the Human Rights Act 1998.

17. LIMITATION OF LIABILITY

17.1. The Funder accepts no liability for any consequences, whether direct or indirect, that may arise from the Recipient running the Project or from the use of the Grant.

The Recipient shall indemnify and hold harmless the Funder, its employees, agents, officers or sub-contractors with respect to all claims, demands, actions, costs, expenses, losses, damages and all other liabilities arising from or incurred by reason of the actions and/or omissions of the Recipient in relation to the Project, the non-fulfilment of obligations of the Recipient under this Agreement or its obligations to third parties.

17.2. The Funder accepts no liability for any consequences, whether direct or indirect, that may arise from withdrawal of the Grant where there is a breach of this Agreement by the Recipient or the continuance of the Grant may be a breach in law.

17.3. Subject to clause 17.1, the Funder's liability under this Agreement is limited to the payment of the Grant.

18. WARRANTIES

The Recipient warrants, undertakes and agrees that:

(a) it has all necessary resources and expertise to deliver the Project (assuming due receipt of the Grant);

(b) it has not committed, nor shall it commit, any Prohibited Act;

(c) it shall at all times comply with all relevant legislation and all applicable codes of practice and other similar codes or recommendations, and shall notify the Funder immediately of any significant departure from such legislation, codes or recommendations;

(d) it shall comply with the requirements of the Health and Safety at Work etc. Act 1974 and any other acts, orders, regulations and codes of practice relating to health and safety, which may apply to employees and other persons working on the Project;

(e) it has and shall keep in place adequate procedures for dealing with any conflicts of interest;

(f) it has and shall keep in place systems to deal with the prevention of fraud and/or administrative malfunction;

(g) all financial and other information concerning the Recipient which has been disclosed to the Funder is to the best of its knowledge and belief, true and accurate;

(h) it is not subject to any contractual or other restriction imposed by its own or any other organisation's rules or regulations or otherwise which may prevent

or materially impede it from meeting its obligations in connection with the Grant;

(i) it is not aware of anything in its own affairs, which it has not disclosed to the Funder or any of the Funder's advisers, which might reasonably have influenced the decision of the Funder to make the Grant on the terms contained in this Agreement; and

(j) since the date of its last accounts there has been no material change in its financial position or prospects.

19. INSURANCE

19.1. The Recipient shall effect and maintain with a reputable insurance company a policy or policies in respect of all risks which may be incurred by the Recipient, arising out of the Recipient's performance of the Agreement, including death or personal injury, loss of or damage to property or any other loss (the **Required Insurances**).

19.2. The Required Insurances referred to above include (but are not limited to):

(a) public liability insurance with a limit of indemnity of not less than ten million pounds (£10,000,000) in relation to any one claim or series of claims arising from the Project; and

(b) employer's liability insurance with a limit of indemnity of not less than five million pounds (£5,000,000) in relation to any one claim or series of claims arising from the Project.

The Recipient shall (on request) supply to the Funder a copy of such insurance policies and evidence that the relevant premiums have been paid.

20. DURATION

20.1. Except where otherwise specified, the terms of this Agreement shall apply from the date of this Agreement until the contractual defects period or for so long as any Grant monies remain unspent by the Recipient, whichever is longer.

20.2. Any obligations under this Agreement that remains unfulfilled following the expiry or termination of the Agreement shall survive such expiry or termination and continue in full force and effect until they have been fulfilled.

21. TERMINATION

The Funder may terminate this Agreement and any Grant payments on giving the Recipient three months' written notice, up to the point that a binding contract has been signed with a contractor for the delivery of the project, should it be required to do so by financial restraints or for any other reason.

22. ASSIGNMENT

The Recipient may not, without the prior written consent of the Funder, assign, transfer, sub-contract, or in any other way make over to any third party the benefit and/or the burden of this Agreement or transfer or pay to any other person any part of the Grant, except as contemplated as part of the Project.

23. WAIVER

No failure or delay by either party to exercise any right or remedy under this Agreement shall be construed as a waiver of any other right or remedy.

24. NOTICES

24.1 Any notice to be given under this Agreement shall be in writing and may be served by personal delivery, first class recorded or, subject to clause 24.2, e-mail to the address of the relevant Party, or such other address as that Party may from time to time notify to the other Party in accordance with this clause.

24.2 Notices served as above shall be deemed served on the Working Day of delivery provided delivery is before 5.00pm on a Working Day. Otherwise delivery shall be deemed to occur on the next Working Day. An email shall be deemed delivered when sent unless an error message is received.

25. DISPUTE RESOLUTION

25.1 The Parties shall attempt in good faith to negotiate a settlement to any dispute between them arising out of or in connection with this Agreement within 30 days of either Party notifying the other of the dispute such efforts shall involve the escalation of the dispute to the finance director (or equivalent) of each Party.

25.2 Nothing in this dispute resolution procedure shall prevent the Parties from seeking from any court of the competent jurisdiction an interim order restraining the other Party from doing any act or compelling the other Party to do any act.

25.3 If the dispute cannot be resolved by the Parties pursuant to this clause the dispute shall be referred to mediation pursuant to the procedure set out in below unless (a) the Funder considers that the dispute is not suitable for resolution by mediation; or (b) the Recipient does not agree to mediation.

25.4 The performance of the Agreement shall not be suspended, cease or be delayed by the reference of a dispute to mediation and the Recipient (or employee, agent, supplier or sub-contractor) shall comply fully with the requirements of the Agreement at all times.

25.5 The procedure for mediation and consequential provisions relating to mediation are as follows:

(a) a neutral adviser or mediator ("the Mediator") shall be chosen by agreement between the Parties or, if they are unable to agree upon a Mediator within 14 days after a request by one Party to the other or if the Mediator agreed upon is unable or unwilling to act, either Party shall within 14 days from the date of the proposal to appoint a Mediator or within 14 days of notice to either Party that he is unable or unwilling to act, apply to the Centre for Effective Dispute Resolution ("CEDR") to appoint a Mediator.

(b) The Parties shall within 14 days of the appointment of the Mediator meet with him in order to agree a programme for the exchange of all relevant information and the structure to be adopted for negotiations to be held. If considered appropriate, the Parties may at any stage seek assistance from CEDR to provide guidance on a suitable procedure.

(c) Unless otherwise agreed, all negotiations connected with the dispute and any settlement agreement relating to it shall be conducted in confidence and without prejudice to the rights of the Parties in any future proceedings.

(d) If the Parties reach agreement on the resolution of the dispute, the agreement shall be reduced to writing and shall be binding on the Parties once it is signed by their duly authorised representatives.

(e) Failing agreement, either of the Parties may invite the Mediator to provide a non-binding but informative opinion in writing. Such an opinion shall be provided on a without prejudice basis and shall not be used in evidence in any proceedings relating to the Agreement without the prior written consent of both Parties.

(f) If the Parties fail to reach agreement in the structured negotiations within 60 days of the Mediator being appointed, or such longer period as may be agreed by the Parties, then any dispute or difference between them may be referred to the Courts unless the dispute is referred to arbitration pursuant to the procedures set out in Clause 25.6

25.6 Subject to Clause 25.2, the Parties shall not institute court proceedings until the procedures set out in Clauses 25.3 and 25.5 have been completed save that:

(a) the Funder may at any time before court proceedings are commenced, serve a notice on the Recipient requiring the dispute to be referred to and resolved by arbitration in accordance with the provisions of Clause 25.7.

(b) if the Recipient intends to commence court proceedings, it shall serve written notice on the Funder of its intentions and the Funder shall have 21 days following receipt of such notice to serve a reply on the Recipient requiring the dispute to be referred to and resolved by arbitration in accordance with the provisions of Clause 25.7.

(c) the Recipient may request by notice in writing to the Funder that any dispute be referred and resolved by arbitration in accordance with the provisions of Clause 25.7, to which the Funder may in its discretion consent as it sees fit.

25.7 In the event that any arbitration proceedings are commenced pursuant to Clause 25.6, the following provisions shall apply:

(a) the arbitration shall be governed by the provisions of the Arbitration Act 1996;

(b) the Funder shall give a written notice of arbitration to the Recipient ("the Arbitration Notice") stating:

i that the dispute is referred to arbitration; and
ii providing details of the issues to be resolved;
iii the London Court of International Arbitration ("LCIA") procedural rules in force at the date that the dispute was referred to arbitration in accordance with Clause 25.7 shall be applied and are deemed to be incorporated by reference to this Agreement and the decision of the arbitrator shall be binding on the Parties in the absence of any material failure to comply with such rules;

(c) the tribunal shall consist of a sole arbitrator to be agreed by the Parties;

(d) if the Parties fail to agree the appointment of the arbitrator within 10 days of the Arbitration Notice being issued by the Funder under Clause; or

(e) if the person appointed is unable or unwilling to act, the arbitrator shall be appointed by the LCIA;

(f) the arbitration proceedings shall take place in London and in the English language; and

(g) the arbitration proceedings shall be governed by, and interpretations made in accordance with, English law.

26. NO PARTNERSHIP OR AGENCY

This Agreement shall not create any partnership or joint venture between the Funder and the Recipient, nor any relationship of principal and agent, nor authorise any party to make or enter into any commitments for or on behalf of the other party.

27. JOINT AND SEVERAL LIABILITY

Where the Recipient is not a company nor an incorporated entity with a distinct legal personality of its own, the individuals who enter into and sign this Agreement on behalf of the Recipient shall be jointly and severally liable for the Recipient's obligations and liabilities arising under this Agreement.

28. CONTRACTS (RIGHTS OF THIRD PARTIES) ACT 1999

This Agreement does not and is not intended to confer any contractual benefit on any person pursuant to the terms of the Contracts (Rights of Third Parties) Act 1999.

29. GOVERNING LAW

This Agreement shall be governed by and construed in accordance with the law of England and the parties irrevocably submit to the exclusive jurisdiction of the English courts.

This Agreement is executed by the Parties as a Deed and is delivered and takes effect on the date stated at the beginning of it.

THE COMMON SEAL OF
THE MAYOR AND BURGESSES
OF THE LONDON BOROUGH OF
HAVERING is hereto affixed in the
presence of:

Authorised Signatory

THE COMMON SEAL
OF [SUCCESS FOR ALL EDUCATION TRUST]
was hereto affixed in the presence of:

Director Signature	Director Signature
Print Name of Director	Print Name of Director

1. The Project

Schedule 1. The Project

2. The Project

2.1. Success for All Education Trust will provide a purpose built SEND Unit facility at The Royal Liberty School, Upper Brentwood Road, Romford, RM2 6HJ. The building will be a new permanent building provided in accordance with the requirements described below.

2.2. The new building, and the process of Siting, Designing, Procuring and Delivering and Commissioning the project, shall be wholly the responsibility of Success For All Education Trust and its appointed consultants and contractors

2.3. The building location and facilities to be provided should subject to planning approval and comply with those detailed and agreed by the Local Authority in the feasibility document produced by the Success For All Education Trust consultant AMR dated MMM YYYY. Any deviation from this proposal would need formal written agreement from the Local Authority.

2.4. The new building will meet and comply with:

2.4.1. all of the current Planning and Building Control requirements

Planning

The Academy or its Representative/Contractor will be responsible for obtaining Detailed Planning Consents where appropriate, for compliance with all associated statutory processes and for payment of all fees and charges in connection, although a portion of the grant can be used for these purposes. It is also the Contractor's responsibility to comply with any Conditions or Reserved Matters attached to the Consent. Where there are Conditions which can only be satisfied by the Local Authority, these can be detailed in the Scheme Contract by way of a Schedule. Conditions may also relate to traffic, vehicular access, noise control, and other environmental matters. Although the Local Authority will deal with any planning applications, no special treatment will be accorded this project by planning officers, or by relevant Committees of the Local Authority in deciding upon planning matters. The Local Authority can give no guarantee of approval.

Building Regulations

The Contractor shall comply with all current Building Regulations in respect of new school construction and refurbishment and remodelling works to existing buildings, and must also still meet the terms of all the DfE Constructional Standards 1997 and as amended (2001). The Constructional Standards override the current Building Regulations on Ramps Steps and Handrails (sections F, K & M). It is the Contractor's responsibility to make payment of the appropriate fees and to ensure that

the work is carried out in compliance with the Regulations and Standards and that written approval is received.

2.4.2. The requirements of DfE Building Bulletin (BB) 104; Health and Safety Legislation, Construction Design and Management Legislation, and all other legislation relevant to the provision of a new building

2.4.3. All current legislation in relation to the installation of mechanical and electrical services.

2.5. The project will be funded by a grant of £2,681,484.00 from the London Borough of Havering (the Local Authority). This grant is finite and includes all necessary fees and anticipated costs, and includes for purchase and installation of any fixed furniture and ICT. The Academy agrees to complete the building within this fixed budget. Any costs incurred over and above the grant amount will be borne by the Recipient and funded by other resources available to the Recipient, subject to terms and conditions of that funding.

3. Local Authority's Representative

3.1. Neil Tarrant Head of Capital Delivery & Corporate Estates LB Havering

4. Existing Buildings on or Adjacent to the Site

4.1. The Contractor is deemed to have made due allowance for any effect that existing buildings or structures on or adjacent to the site have on his design and the Works.

5. Specialist surveys required for design development

5.1. The Academy shall procure all specialist surveys needed for the development of design and construction in order for the design and construction to comply with all statutory requirements as well as the Local Authority Requirements.

6. Existing Mains / Services

6.1. The Contractor shall contact the relevant statutory authorities and ascertain the extent and positions of all existing services and drains running over and under the site and immediately adjacent to it in order that the design and construction can be developed without detriment to the functioning of such services and drains.

7. CDM Regulations

7.1. The Academy shall undertake the role of Client under the Construction (Design and Management) Regulations 2015 and shall allocate resources to enable it to comply with the requirements and prohibitions imposed on it by or under the relevant statutory provisions. It is understood that Project

Management Services (as described in the CDM legislation) is being undertaken by persons as appointed by school.

8. Other Consents

8.1. The Academy or their Representative/Contractor is responsible for obtaining all other statutory consents required for any aspect of the works and for compliance with all relevant legislation, covenants, easements or other rights affecting the site. The Contractor shall also be responsible for negotiating any further covenants, easements or other rights that may be required on any of the Sites, for example for statutory undertakers. The Contractor shall consult with the Local Authority relating to the granting of such rights and shall reimburse the Local Authority for its reasonable costs and expenses in connection with such issues.

Statutory Compliances - General

8.2. The Academy or their Representative/Contractor shall, throughout the project, conform to all current Statutes, Statutory Instruments and Amendments, and notwithstanding the above, all statutory minimum requirements must be met for all schools.

8.3. A copy of the approved JCT contract or other with contractors' proposals, employers requirements, and approved plans will be provided to the Local Authority prior to start.

Schedule 2

Payment Schedule

1. Grant Payment Process and Principles – General Rules

1.1. The grant payment will be paid in instalments based on the following principles:

1.1.1. Payments up to £200,000 total will be paid in a single lump sum at the beginning of the project on demonstration of a signed contract with a contractor for the works to be undertaken. An appropriate programme will be required demonstrating that the works will be completed within the agree timeframe. In some circumstances, an advance of funds can be agreed to support project development and design fees.

1.1.2. Payments of more than £200,000 will usually be paid in three instalments of one third of the grant amount;

1.1.2.1. **The first instalment** will be paid at the beginning of the project on demonstration of a signed contract with a contractor for the works to be undertaken. In extraordinary circumstances to be supported by appropriate evidence, the first instalment can be certified by a signed Letter of Intent. In any event an appropriate programme will be required demonstrating that the works will be completed within the agreed timeframe.

1.1.2.2. **The second instalment** will be paid when it is demonstrated that work on the main project has started on site (the Local Authority reserve the right to inspect the site and the works progress at, or shortly after, this declaration).

1.1.2.3. **The third and final instalment** will be paid on completion of the project on site. It is anticipated that this completion will be demonstrated with provision of both a Contractors Certificate of Completion and a Building Control Certificate of Completion.

1.1.3. Programme delays which would impact the delivery and payment schedule as set out in this document will need to be notified to the Local Authority as soon as practicable.

1.1.4. The Local Authority will expect to be invited to see the completed building prior to its occupation by staff and/or students. In some circumstances an advance of funds can be agreed to support project development and design fees.

2. Payment Schedule:

Success For All Education Trust New Build SEND Unit facility. Provision Payment Schedule			
Total Grant £2,681,424.00	Key event	Agreed Payment	Date of Agreed Payment
First Instalment	Construction contract signed between the Contractor and the Trust OR Letter of Intent (LOI) signed between the Contractor chartered surveyors Planning submission, surveys and testing.	£ 600,000	2nd January 2026
Second Instalment	Engagement of building contractor, Materials.	£ 600,000	2nd April 2026
Third Instalment	Contractors and Materials	£ 600,000	2nd August 2026
Fourth Instalment	Contractors and Materials.	£ 600,000	2nd November 2026
Fifth and Final Payment	Date of Practical Completion	£281,424	2nd March 2027

3.

Schedule 3

Contract Documentation and Plans

Trust to provide ahead of Grant Execution

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Havering
LONDON BOROUGH

CABINET	**10 December 2025**
Subject Heading:	Proposal to procure an Open Flexible Framework and interim arrangements for Havering's Children's with Disabilities Statutory Short Breaks.
Cabinet Member:	Councillor Oscar Ford – Cabinet Member for Children and Young People.
SLT Lead:	Tara Geere – Director of Starting Well - Statutory Director of Children's Services
Report Author and contact details:	Lee Clegg – Senior Commissioner Start Well, Havering Integrated Team 01708 431251 Lee.clegg@havering.gov.uk
Policy context:	This proposal is aligned with the Havering Council's Integrated Children's Plan 'Happy, Healthy Lives' (HHL) agenda linked to the Corporate Plan. HHL is structured around our WISH, for children and young people to be **W**ell, **I**nspired, **S**afe, **H**eard and treated fairly. The Council has a Statutory Duty under the Children Act 1989 to provide Short Breaks for Children and young people aged 0-18 with disabilities and their parent/carers.
Financial summary:	To extend two existing 12-month contracts, by a further 6 months, from April 2026-September 2026 at an estimated cost of £0.192m To adopt a Short Breaks framework for the period October 2026-September 2031, with an annual budget of £2.627m and a total of £13.136m over the 5-year life of the Framework.

Is this a Key Decision?	The grounds for this decision being Key is: Expenditure of £500,000 or more
When should this matter be reviewed?	Quarterly contract monitoring once contract is awarded.
Reviewing OSC:	People Overview & Scrutiny Committee

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

People - Things that matter for residents X

Place - A great place to live, work and enjoy.

Resources - A well run Council that delivers for People and Place.

SUMMARY

This report seeks Cabinet approval to:

1. Establish a Short Breaks open framework from 01/10/2026 to 30/09/2031, extend existing provision for a period of 6 months pending go live of the new framework.

2. Delegate authority to the Director of Starting Well to make the decision to award and manage the Framework contract.

3. It is proposed the framework will be open to other North East London Commissioning Partnership boroughs (NEL CP). This is reflective of the general agreement for co-operation between NEL CP boroughs which will support economic of scale and improve partnership working.

RECOMMENDATIONS

Cabinet is asked to:

1. Agree to procure a Havering Short Breaks open framework commencing on 01 October 2026 for a term of five-years at an estimated value to the Council of £13.136m, noting the price: quality evaluation ratio to be used of 30:70.

2. Agree to extend the current two Havering Short Breaks contracts with Family Information Group (FIG) and Disablement Association of Barking & Dagenham (DABD) for six months from 01 April 2026 until 30 September 2026 to support the interim arrangements.

3. Agree to extend the arrangements for provision of Short Breaks via Individual Placement Agreements (IPAs) with existing providers and if required with new providers until the commencement of the new Short Breaks' framework on 30 September 2026.

4. Delegate authority to the Director of Starting Well to:

    a. enter all arrangements and documentation necessary to give effect to 2 and 3 above
    b. establish the Short Breaks Framework and award initial framework contracts; and open the framework and award framework contracts as required throughout the term of the framework.
    c. set the fee for access to the Short Breaks Framework and enter into access agreements as required

5. Note that call off contracts throughout the term of the framework will be awarded in line with the Council's financial scheme of delegation

REPORT DETAIL

1. The children with Special Educational Needs and Disability (SEND) population in Havering continues to grow, with the largest groups being children with Autistic Spectrum Disorder and Speech, Language and Communication Needs. A comprehensive internal review and options appraisal of the Short Breaks offer for children and young people with SEND has been carried out to inform recommendation in this decision paper. See Annex A below.

2. Key findings of a review of these services have highlighted that, while the current Short Breaks offer supports many families, there are some gaps and inconsistencies within the service offer in relation to accessibility, suitable variety to meet need, and communication. Parents and carers have expressed, through a survey, and through feedback to the Parents Voice, ongoing concern around limited activity options, difficulties in understanding the Havering offer and accessing the services, as well as a lack of overnight respite provision.

3. This feedback has led to Havering Council to review its Short Breaks Statement offer as part of the ongoing reshaping and restructuring of social care teams. The teams are reviewing their processes and procedures to ensure that we continue to deliver to our published statement offer, which

assists parents and carers with accessing statutory Short Breaks provision in Havering.

4. As part of the review process, we also undertook a benchmarking exercise to look at how our neighbouring boroughs deliver their Short Breaks provision. Access to Short Breaks varies by borough, depending on each council's criteria. Most local authorities use a tiered threshold approach, the same as the one proposed in this paper for Havering, under Universal, Targeted, and Specialist criteria.

5. Parents who gain access to Targeted and Specialist Short Breaks will have the opportunity to undergo a Children's Social Care assessment. Implementing this approach will provide an enhanced, more equitable, and flexible offer to parents/carers for essential services, while streamlining processes and ensuring effective oversight is in place.

6. Financial analysis has highlighted significant budget pressures, primarily due to a shortage of providers in the local market alongside the individual 'spot purchasing' approach, rather than the use of an established framework. The recommendations set out in this report will enable the borough to procure services that are value for money, ensuring parents, carers, and children and young people are getting better choices from future Short Breaks services.

7. The review of Havering's Short Breaks provision for children with SEND found gaps in accessibility, activity options, and overnight respite. In response, the Council proposes a tiered framework approach to improve equity, flexibility, and service oversight. This strategy, alongside a new procurement model, aims to address budget pressures and ensure better value and choice for families.

8. Using an open framework allows the Council to re-open the framework for admission of new providers periodically throughout the term of the framework contract. This mitigates against loss of provision if providers close or there is lack of capacity. Opening the framework to more providers will also ensure a competitive offer as new providers entering the marketplace will be able to join the framework and compete for opportunities.

9. Once awarded, the contract will provide an improved range of statutory Short Breaks options to parents/carers of children with disabilities, whilst offering value for money on Short Breaks costs. It will also reduce the degree of 'spot purchasing' in operation and enable Havering Council to remain consistent with current procurement rules.

10. It is proposed the framework will be open to other NEL CP boroughs. This is reflective of a general agreement for co-operation between NEL CP

boroughs, leading to greater partnership working and achieving greater economic of scale during the framework contract period.

11. The contract will also enhance equality, diversity, and inclusion (EDI) through diverse co-production and enhanced social value provisions, ensuring that services are accessible and responsive to the needs of the children and their families.

12. We are suggesting that existing short breaks providers on spot purchase arrangement adopt an IPA agreement for individual child placements as this would enhance both oversight and quality.

13. This report proposes that the Council creates a structured Short Breaks offer, enabling eligible children to access a range of activities covering evenings, weekends, holidays, overnight stays, and one-off events. The offer will be based on the two levels of need, Targeted, and Specialist thresholds, with providers delivering activities and opportunities aligned to the five lots proposed below to children with disabilities.

Thresholds of Needs	
Targeted	**Specialist**
For all children with additional needs who have a confirmed diagnosis, qualify for Disability Living Allowance (DLA) or have an Education Health Care Plan (EHCP)	For children who have a severe to profound level of disability and meet the criteria for Children with Disabilities (CWD) support

Lots
Lot 1 - Provision of Day Care Activities
Lot 2 - Provision of School Holiday Schemes
Lot 3 - Provision of Approaching Post 16
Lot 4 - Provision of In the Home & Community Care
Lot 5 - Provision of Residential Overnight Stays

REASONS AND OPTIONS

Procurement Options Appraisal:

1. In conducting the procurement options appraisal, the tender process has been organised into five distinct ‘Lots’ of provision. This structure is designed to foster engagement across a wider provider market, ensuring that both Small and Medium-sized Enterprises (SMEs) and Voluntary Sector

Organisations have increased opportunities to participate and submit applications.

Options

- Option 1: Do Nothing - continue with two contracted providers and individual 'spot purchasing' arrangements.
- Option 2: Develop a Havering Children's Short Breaks open framework that has access arrangements for other local authorities built in.
- Option 3: Develop a Pseudo children's Dynamic Purchasing System (DPS) for Short Breaks

Options	Advantages	Disadvantages
Option 1: Do Nothing (continue with two contracted providers and spot purchasing)	• Avoids additional costs in terms of procurement and commissioning resources.	• Does not meet legal and regulatory requirements or best practice. • High-cost Short Breaks contribute adversely to the local authority's financial position. • Risk of poor oversight of provision and budget. Shortage of local providers in the current spot purchasing system. • Poor relationships with the provider market. Not value for money.
Option 2: Develop a Havering Children's Short Breaks Open Framework that includes vetting and quality assurance	• Efficiency – framework contracts streamline the procurement process by pre-negotiating terms and conditions, reducing administrative burden, and saving time. • Customisation – the ability to tailor Universal, Targeted, and Specialist options to meet the needs of Havering's children with disabilities. • Greater control over specifications, selection criteria, quality standards, and pricing mechanisms. • Greater flexibility to adapt and modify the Short Breaks offer as needed within the contract terms	• Will require upfront and ongoing time, effort, and resource to develop and maintain. • Reduced competition – could limit access to new or alternative providers in the market, which may hinder better prices or terms. • Limited flexibility – may restrict the ability to adapt to changing needs or circumstances and explore new or improved ways of delivering services.

	via contract variation without external constraints. • Economies of scale will enable and leverage bulk discounts and fix prices, resulting in overall savings. • Risk management –establishing terms and conditions provides more certainty and the ability to reduce potential risks and uncertainties. • Long-term relationships – enables the fostering of trusted collaborations with suppliers, encouraging knowledge sharing and innovation. • Children's Services will continue to centrally manage the resourcing of Short Breaks with Brokerage and the quality team.	• Resources are spread across the council in relation to Brokerage, quality assurance of provision and social care teams and will require robust communication and monitoring
Option 3: Development of a Pseudo Children's Dynamic Purchasing System (DPS) (light touch regime) for Short Breaks	• Flexibility – allows new providers to join at any set time, ensuring a continuous influx of potential new providers. • Improves competition as the open nature of the DPS encourages ongoing competition and can lead to better quality and price. • Efficiencies can be achieved as it streamlines procurement processes by reducing the need for repeated tendering, thus saving time and administrative costs. Children's brokerage is in line with procurement regulations • Value for money, quality, and community contribution are realised. • Optimist system will link to Fusion, which supports financial processing and accuracy. • Greater oversight of financial and resource implications.	• Complexity – managing a DPS can be more labour intensive and challenging due to the continuous on-boarding of new providers at set periods for the duration of the DPS. • Resource intensive – ongoing management and evaluation of providers can require significant resources and effort. Specification challenges – will require precise specifications for each element of the DPS service. • Mobilisation and implementation plan and training will be required.

Reasons for choosing option 2:

1. The rationale for recommending option two is grounded in parental preference and the value for money it offers to the local authority.

2. This approach will encourage providers to collaborate closely with Havering Council to further develop current provision, whilst also inviting new innovations to complement and broaden the variety of Short Breaks on offer.

3. This option will enable children with disabilities and their families to access Short Breaks easily and with maximum flexibility. Furthermore, it will allow Havering to offer access to the Framework to other local authorities.

IMPLICATIONS AND RISKS

Financial implications and risks:
Comments from Finance:
Short Breaks Framework Agreement

1. This report proposes the development of a Short Breaks Framework to replace the current procurement arrangements that are mainly reliant on "Spot Purchases". The Framework will commence on 01 October 2026 and run for a maximum of 5 years (3 years plus 2 extension)

2. The full year budget for Short Breaks is £2.627m, which equates to £13.136m over the 5-year life of the contract. Expenditure is dependent upon demand, but the expectation is that it will be contained within the annual budget envelope. If this is not possible, additional funding will need to be identified from within the overall budget for Starting Well. The total spend in 2024/25 was £2.7m, which is £73,000 more than the current budget.
3. The creation of the Framework and its ongoing maintenance will be managed within existing resources, and there is potential to generate additional income if other local Authorities require access to the LBH Framework.

Extension of existing contracts

1. In addition to spot purchases, there are currently 2 contracts in place to deliver Short Breaks. The estimated cost of these contracts in 2025/26 is £383,000.
2. As both contracts expire at the end of March 2026, a 6-month extension to 30th September 2026 is proposed as an interim arrangement until the new Framework comes into effect at the start of October 2026.

3. The estimated cost of the contract extension is £192,000.

4. Short Breaks provision was purchased from the thirty-six providers during 2024/2025 resulting in expenditure being reported at the end of the year at £2,703,822, which subsequently resulted in an overspend of £1,126,562.

Proposed full contract value for new Short Breaks Service 2026/2031

	Using 2025/2026 budget allocation figure	Duration of proposed framework	Forecast full contract value
Short Breaks (A33900)	£2,627,260	5 years (3+2 extensions) Opening year 3 and on demand if required.	£13,136,300

Legal implications and risks: Legal.procurement@onesource.co.uk
Comments from Legal:
The Council power under Section 111 of the Local Government Act 1972 to do anything which is calculated to facilitate, or is conducive or incidental to, the discharge of any of its functions.

The Council also has a general power of competence under Section 1 of the Localism Act 2011 to do anything an individual can do, subject to any statutory constraints on the Council's powers. None of the constraints on the Council's s.1 power are engaged by the recommendations in this report.

The Short Breaks services are light touch services for the purposes of the Procurement Act 2023 (PA23). The estimated value of the framework is above the relevant threshold, and the procurement is caught by the full light touch regime, The open framework proposed is permissible under the PA23.

The existing contracts appear to be contracts which were procured under Public Contracts Regulations 2015 (PCR 2015). An extension must fall within one of the safe harbours set out in PCR 2015 Regulation 72. It is arguable the proposal to extend them by 6 months may be viewed as non-substantial for the purposes of Regulation 72(1)(e) in particular as the extension does not extend the scope of the contracts considerably and does not alter the economic balance of the contracts in favour of the operator

Any award of "new" spot contracts during the 6 months before the framework is established should be compliant with the Council's scheme of financial delegation and contract procedure rules.

The Council is a Best Value authority. As set out in this report officers consider the recommended approach to offer best value

For the reasons set out above the decisions may be made.

Human Resources implications and risks:
Comments from HR
There are no HR implications arising from this procurement decision. No changes to staffing structures, terms and conditions, or workforce planning are anticipated.

Equalities implications and risks:

Comments from READI
The Cabinet Report demonstrates a positive EDI direction, reflecting an intent to improve equity and access for children and young people with disabilities.

Health and Wellbeing implications and Risks
This proposal decision aims to contribute positively to the health and wellbeing of children and young people and their parent/carers. It will enable children and young people by supporting.

- An individual's behaviour and lifestyle such as smoking, diet, exercise, alcohol consumption, or self-care,
- Mental health and wellbeing,
- Access to and quality of education or other training opportunities,
- Employment, income, opportunities for economic development,
- Access to green space, sports facilities, and opportunities to be active,
- Quality availability and affordability of homes and housing,
- Opportunities to interact socially with other people, reduce social isolation, improve community support networks and be enable them to live independently.
- Ability to access health and social care services.
- Transport, and connections to places within or between the boroughs.

Comments from Public Health:
Having Council is committed to promoting and protecting the health and wellbeing of residents. There are no direct health and wellbeing implications arising from the report recommendations relating to the chosen procurement approach for Short Breaks provision. However, by supporting Council to offer a more robust, flexible Short Breaks provision, implementation of the framework will potentially deliver important health and wellbeing benefits both for the children or young people, and for their parents/carers/families. For children and young people with SEND, access to and engagement with Short Breaks offers an important opportunity to take part in activities that support social connection, skills development, creativity, and general enjoyment – all of which can contribute to improved wellbeing. For parents/carers and families, Short Breaks offer an opportunity for a break from caring responsibilities, which can support improved carer resilience and provide

Environmental and climate change implications and risks
The risks to climate change would be considered as low with regards to Short Breaks
as they do not involve any industrial or large-scale pollution or emission increasing activities. As part of the provider approval and quality assurance process, considerations will be prompted and information gathered around some of the elements illustrated below.
Some indicative matters to be considered include:

- The impact on carbon emissions.
- Offsetting carbon emissions.
- Improving nature and biodiversity.
- Preparing for the impacts of climate change through adaptation.

BACKGROUND PAPERS

Appendix A – Short Breaks Review Executive Summary
Appendix B – Stakeholder Engagement

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APPENDIX A

Short Breaks Review and Commissioning Approach document:

Executive Summary

Purpose This document outlines the plan for improving the London Borough of Havering's Short Breaks offer for parents, carers, and young people with Special Educational Needs and Disabilities (SEND). The proposed plan aims to implement a robust commissioning approach starting on 01 October 2026, based on the findings of a comprehensive service review. The review included feedback from families, carers, officers, and data from the Children with Disabilities (CWD) team and contract monitoring.

Introduction The London Borough of Havering, in collaboration with parent groups and partners, has conducted a thorough review of its Short Breaks offer for children and young people with SEND. This review addresses increasing demand, evolving family needs, and the requirement to align with statutory obligations and local strategic priorities. The goal is to ensure that Short Breaks are accessible, inclusive, and effective in supporting both children and their carers.

Background & Legislation Local Authorities are mandated to provide Short Breaks designed to offer positive experiences, foster friendships, and develop confidence, independence, social, and emotional skills. These breaks support the personal development of children and young people with SEND while providing a respite for their primary carers.

Feedback from Parents and Young People Consultations with parents and carers revealed ongoing concerns about access, variety, and communication regarding the Short Breaks offer. Parents requested more inclusive and diverse activities, better communication, and improved accessibility. There is also a strong demand for overnight respite services and support for older children and young adults.

Demography and Needs The increasing population of children with SEND in Havering highlights the need for communication- and sensory-friendly services. Data indicates that 71% of children with Education Health Care Plans (EHCPs) accessed Short Breaks, showing strong uptake but also room for growth.

Gap Analysis The review identified gaps in the current Short Breaks offer, leading to spot purchasing to fill these gaps. Spot purchasing addresses unplanned needs but lacks consistency and oversight.

Current Short Breaks Offer The current Short Breaks contract, in place since April 2017, has supported children and young people with SEND. However, parents report issues with access and consistency. The review found that a significant portion of the budget was being spot purchased, indicating higher demand for diverse activities.

Financial Overview The review uncovered significant overspending against the short breaks budget, with additional expenditure occurring through spot purchasing and direct payment arrangements with un-commissioned providers.

Recommendations The document recommends setting up interim commissioning arrangements, developing a flexible Open Framework, and improving user communications. The Open Framework will enable local providers and voluntary Small, Medium Enterprises to express their interest in specific elements of the Short Breaks offer. This approach aims to provide greater opportunities and flexibility for both providers and parents, encouraging innovation and developing a diverse provider market.

Stakeholder Involvement Report - Short Breaks Contract Development

Executive Summary

This report provides an overview of stakeholder involvement in the development of the Short Breaks contract, focusing on contributions from Havering SEND Family Forum and the Havering SEND Family Voice Forum. The purpose of this engagement was to ensure that parent and carer perspectives were integrated into commissioning decisions and framework design.

Key engagement dates include planning discussions in May and June 2025, active participation in working group meetings during July and September, and follow-up communications in November. These interactions encompassed listening to sessions, voting on framework options, and collaborative planning for procurement and quality assurance.

Major contributions from stakeholders included feedback on family needs, co-production of framework lots, and strategic input on inclusive activities and engagement strategies. Their involvement shaped the structure of the procurement framework and informed market engagement approaches.

Overall, this collaborative process strengthened the Short Breaks contract by embedding parent voice into its design, ensuring that services align with the needs of families and support improved outcomes for children and young people.

1. Purpose

To document the timeline and nature of engagement with Havering SEND Family Forum and the Havering SEND Family Voice Forum in the co-production of the Short Breaks commissioning framework and contract development.

2. Engagement Timeline

Date	Type of Engagement	Details & Contribution
23Sep23	Survey	Feedback collected from families about Short Breaks. The survey results are helping shape Havering's future SEND strategy, ensuring family voices guide service improvements.
24Feb25	Working Group	Fortnightly meetings to inform Short Breaks developments. Membership consisted of senior staff from: Commissioning Brokerage Quality Assurance

		Procurement Legal Finance Head of Service Safeguarding Strategic Manager Children with Disabilities (CWD) Operational Manager CWD Havering Parent Voice Network
16May25	Teams	Survey evaluation and preparation for Short Breaks contract kick off.
19May25	Email & Planning	Discussion on Short Break listening sessions before summer holidays for wider parent feedback.
11Jun25	Email & Session Setup	Clarified purpose of listening sessions; theme set as “support for parent carers;” planned overview from CWD team and parent feedback sharing.
23Jul25	Email	Shared resources (Support & Activities Padlet)
25Jul25	Working Group Meeting	Parent Voice represented during group discussions on procurement and legal implications for Short Breaks.
01Sep25	Procurement Framework Meeting	Havering SEND Family Forum attended Short Breaks Procurement Framework Working Group; contributed to decisions on structure, onboarding, and quality assurance for providers.
02Sep25	Voting on Framework Options	Havering SEND Family Voice participated in meeting follow-up; reviewed and voted on term length and framework structure options.
12Nov25	Email & Future Planning	Confirmed catch-up meetings with commissioners; shared feedback from families on activity access; proposed “Pupil Voice Activity” initiative to link with Short Breaks work.
12Nov25	Children’s Focus Groups	Proposed for Autumn Term 2025 in collaboration with the Primary Inclusions Network of schools.

3. Key Contributions

- Feedback Channels: Parent Voice provided insights via surveys and listening sessions, highlighting gaps in activity access and support for families.
- Co-Production: Active involvement in shaping framework lots and governance through Working Group meetings.
- Strategic Input: Suggested initiatives like inclusive activity clubs and linked engagement with schools to Short Breaks planning.

4. Impact on Contract Development

- Informed framework design (open lots, flexible onboarding, quality assurance).
- Influenced engagement strategy, ensuring parent/carer voice integrated into commissioning decisions.

- Supported market warming and provider consultation to align offers with family needs.

Next Steps

- Schedule follow-up with Havering SEND Parent Forum to co-produce the Short Breaks Framework tendering and implementation progress.
- Incorporate feedback from planned focus groups including children and young people.

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CABINET

Subject Heading:	Permission to extend the Adults Drug & Alcohol Contract for 3 years and approval for an uplift to the contract value
Cabinet Member:	Councillor Gillian Ford, Cabinet Member for Health and Adult Care Services
ELT Lead:	Kathy Freeman, Strategic Director of Resources
Report Author and contact details:	Caroline Carey, Senior Commissioner Caroline.carey@havering.gov.uk
Policy context:	The UK Government's 10-year drugs strategy, 'From Harm to Hope', sets out a whole-system approach to tackling substance misuse, aiming to reduce drug use, cut supply chains, and deliver a world-class treatment and recovery system. Locally, the Havering Combating Drugs Partnership has responded by developing a comprehensive strategy and conducting a detailed needs assessment, which highlights rising substance misuse-related crime, increasing alcohol-related mortality, and significant unmet treatment need, over two-thirds of opiate and crack users and 82% of alcohol misusers in Havering are not in treatment. Substance misuse is recognised as a complex public health issue that impacts individuals, families, and communities, with the most deprived areas facing the greatest burden. Commissioned services aim to address these challenges through integrated, evidence-based interventions, partnership working, and a focus on prevention, early intervention, and recovery, in line with both national expectations and the specific needs of Havering's population.

Financial summary:	The budget for the 3-year extension and an uplift will come from existing public health core grant funding. The Director of Public Health has been consulted on this decision and has confirmed approval for the expenditure from the public health core funding, as set out in this report. **The total contract value for 3 years, including the uplift is £4,474,903.00** Year 1 - £1,464,041 Year 2 - £1,491,452 Year 3 - £1,519,411 **Total - £4,474,903.00**
Is this a Key Decision?	Key Decision as expenditure is over £500,000
When should this matter be reviewed?	10/06/2026
Reviewing OSC:	Peoples Overview & Scrutiny 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	
Resources - Enabling a resident-focused and resilient Council	**X**

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SUMMARY

This report proposes that Cabinet approves the three-year extension of the Adults Drug and Alcohol Service contract in Havering, delivered by Change, Grow, Live (CGL), from 1 April 2026 to 31 March 2029, along with an uplift of £501,205 to the contract value for this period. The intended outcome is to ensure the continued delivery of high-quality, integrated prevention, treatment, and recovery services for adults in Havering who misuse drugs and alcohol. The extension and uplift are necessary to address rising operational costs and maintain service quality and capacity, thereby supporting vulnerable residents, meeting statutory responsibilities, and aligning with national and local strategies to reduce substance misuse harms.

RECOMMENDATIONS

This report recommends that Cabinet agree to:

A) Enact the 3-year extension option within the contract with Change, Grow, Live Services Limited for the Adults Drugs & Alcohol Service for years 26/27 27/28 28/29 with a total value over the 3-year period of £4,474,904 commencing on 1st April 2026 and,
B) Approve an uplift in cost over the 3 years totalling £501,206 (as compared to the base contract), to be funded from the Public Health grant.

REPORT DETAIL

Change, Grow, Live Services Limited (CGL) currently holds the contract for the provision of Adults Drug and Alcohol Services in Havering and the Initial 5-year contract period ends on 31st March 2026 and the London Borough of Havering (LBH) now seek to enact the 3-year extension option built into the contract, which will take the contract to 31st March 2029. In addition, CGL are seeking an uplift for the 3-year extension period for years 2026-29, having already had an uplift agreed for previous years.

Overview of the contract

Since 2013, the service has been funded by the Council's Public Health Grant to deliver support services for the prevention, treatment and recovery of adults in Havering who misuse drugs and alcohol. The service leads on supporting adults recover from their misuse working closely with key local services to ensure primary care, social care, mental health, housing and criminal justice pathways are in place and effective. In addition, the service provides harm reduction services including education and training, needle exchange services across the borough, psychosocial and pharmacological treatment as well as

pathways to relevant employment and training services. A comprehensive list of the services specified in the contract are as follows:

- Acute Hospital Alcohol liaison (i.e. local hospital)
- Criminal justice liaison (e.g. court, prisons, probation)
- Community detoxification
- Needle Exchange
- Supervised Consumption
- Residential Detoxification and rehabilitation services
- Key-working and supervision
- Group-work programmes
- Family & Carers support
- Counselling support
- Volunteering and mentoring support and training
- Transition from young people's substance misuse service
- Multi-agency, joint working with wider stakeholders
- Professionals training (e.g. social care, health)
- Clinical expertise and leadership
- (IPS) Individual Placement Service (Support to Employment)

Budgetary Pressures

Over recent years, sustained inflationary pressures have led to a continuous rise in operational costs across CGL's core service areas. Key expenditure lines including staffing, utilities, dispensing costs, pharmacy services, IT, and essential supplies, have seen significant increases. As a result, adult service budgets are being stretched to their limits. Without an uplift in funding for the coming years, this ongoing financial strain will directly impact the organisation's ability to deliver consistent, high-quality services. The uplift is only required to account for CGL's increased costs caused by inflationary pressures. CGL will not provide any additional services that were not agreed in the contract following the uplift. The uplift will not change the economic balance between the Council and CGL.

Without additional financial support, there is a significant risk that the capacity and quality of services for vulnerable adults will be compromised, undermining national and local strategies to reduce substance misuse harms. The proposed uplift for the three-year extension (2026–2029) of the Adults Drug and Alcohol Service contract with Change, Grow, Live (CGL) is essential to sustain prevention, treatment, and recovery services for Havering residents. Since the service's inception, inflationary pressures have driven up costs across staffing, utilities, pharmacy, and essential supplies, stretching the budget to its limits. The uplift will ensure continuity of care, support multi-agency pathways, and avoid the disruption and higher costs associated with re-procurement. Benchmarking shows that the CGL service in Havering delivers strong value for money compared to similar boroughs, operating at a relatively modest contract value while boroughs with similar or smaller populations and treatment volumes have notably higher allocations. The proposed increase aligns with inflationary adjustments already recognised for 2024–2026 and is necessary to maintain high-quality, integrated services that meet the ongoing needs of the local population.

In 2024, an uplift of £306,381 was approved for the financial years 2024–2026 only, with the funding split as £121,789 for 2024/25 and £184,583 for 2025/26. Inflationary pressures were recognised at the time of issuing this uplift, and projections for subsequent years indicate a comparable financial requirement, particularly as such pressures continue to impact service delivery costs. Cost-saving measures such as recruitment freezes were implemented in 2024 and remain in place.

Finances

When awarded with this contract in 2021 the contract amounts specified for years 2026-2029 were as follows:

Year	2026/27	2027/28	2028/29	Total 3 years
Original Contract Cost	£1,306,509	£1,324,446	£1,342,743	**£3,973,698**

For the reasons mentioned above, the total anticipated cost of the contract is now as follows:

Year	2026/27	2027/28	2028/29	Total 3 years
Uplifted Contract Cost	£1,464,041	£1,491,452	£1,519,411	**£4,474,904**

Therefore, to meet the deficit the below amounts are needed by way of an uplift in order for CGL to continue to deliver the existing offer and service:

Year	2026/27	2027/28	2028/29	Total Uplift
Uplift Required	£157,532	£167,006	£176,668	**£501,206**

The total cost for the contract extension for 3 years, with the inclusion of the uplift:

Year	2026-2029
Total cost to the Council	**£4,474,904**

Performance

CGL are performing well in relation to several of their KPI's, however there is room for improvement in others. CGL accept that there are improvement areas, for example, the number of opiate users entering treatment, and are willing to work with commissioners on an improvement plan should the uplift be granted.

In addition, the service has pro-actively worked well with commissioners and Public Health on areas such as Synthetic Opioid preparedness plan, Drug and Alcohol Reviews of Death (DARD), and Grant returns, showing the benefit that CGL brings to the work and projects.

CGL has built strong partnerships with primary care, mental health, housing, and criminal justice services, which would be difficult to replicate quickly with a new provider. The process of retendering would be resource intense, costly and the market is unknown. Familiarity and consistency remains for the service users by remaining with CGL as an established service allowing continuous care an established local integration.

Referral Numbers

Referral numbers for Havering have remained consistent across the last three years, with no major drop-offs, indicating continued demand and community engagement even under growing financial pressure. As of March 2025, there are 540 clients on the caseload. All clients in care have planned psychosocial work, along with opportunities to participate in-group work, 121 key work sessions, counselling, peer support and mutual aid sessions.

Harm Reduction Outcomes

Numbers fluctuated across the years, however consistently met the top quartile across years 23-25. In 24/25**,** 67.1% of eligible clients were tested for Hep C in Havering (vs 58.3%

nationally). Additionally, 100% of PCR-positive clients were referred for Hepatitis C treatment for Havering (vs 82.3% nationally).

NDTMS Compliance
Has been consistent at 100% across all years reflecting strong data quality and reporting.

Retained in Treatment Measure
Havering outperforms national averages in retaining clients in treatment. In 24/25 99.4% of alcohol and non-opiate clients were retained or completed treatment for 12+ weeks, compared to the national average of 86.1%. This is a good indicator of service quality and engagement. However, Opiates were slightly below the national average at 91.3% versus 93.5%.

Alcohol Treatment Progress/ Completion:
Successful Community Alcohol Detoxification Completions were consistently met across years 23-24, with a decline observed in 2025; however, CGL remain above the national average at 35.7%. Progress in both opiate and non-opiate treatment has declined, yet a key indicator within the Local Outcomes Framework—the Treatment Progress Indicator, measured every 12 weeks—shows that CGL are currently achieving a 48% outcome rate, compared to the national average of 47%. Furthermore, all treatment completions are consistently underpinned by a recovery plan.

Education/Training/Employment
As at end March 2025, 517 of the 540 (95.7%) clients were accessing Education/Training and or Employment. Service users receive tailored support to build their skills and confidence for employment, including personal skills assessment, job preparation, and access to relevant education, training, and volunteering opportunities. The service works in partnership with local employers and agencies to identify and support access to relevant education, training, and employment opportunities. The service also provides harm reduction and overdose prevention training, and ongoing in-work support to help users sustain employment.

Early Unplanned Exits
All years met the threshold of 5% for Alcohol and 10% for Non-Opiates, with consistently low rates indicating strong retention in treatment. Although Opiates did not meet the 10% threshold for the past two years, it is important to highlight that Havering is performing better than the national average for unplanned exits for Opiates, with a rate of 20.2% compared to the national 21.4%. This lower performance in relation to Opiates reflects a wider national trend and is not unique to CGL. Furthermore, Havering has substantially lower early exit rates than national averages, particularly for non-opiate and alcohol clients (1% for Havering versus 18.6% nationally), suggesting clients are being appropriately assessed and supported throughout their treatment journey.

Estimates of Unmet Needs of Alcohol and Drugs Users in Havering
The service successfully reduced the numbers of unmet need in relation to those not in treatment for Opiates and Crack, however Alcohol is above the required numbers.

Rough Sleepers
The DD post which is funded from the Housing team has seen some positive work in the reach of numbers of homeless clients, with 102 for 24/25 being worked on collaboratively with CGL and the homelessness team.

Mental Health Conditions

CGL improved the care of co-occurring mental health conditions which was a long-standing issue for all previous providers. Clients entering treatment identified as having a mental health treatment need for Opiates is 61.0% (72 / 118), Non-opiate 75.7% (81 / 107), Alcohol 60.5% (127 / 210), Alcohol and non-opiate 76.3% (61 / 80). CGL now have a joint working protocol in relation to Mental Health, so clients are receiving a more joined up approach where they have a Mental Health need alongside substance and alcohol misuse.

Recommendation
Cabinet is recommended to approve the three-year extension of the Adults Drug and Alcohol Service contract (2026–2029) and the associated uplift of £501,205. This uplift is necessary to address inflationary pressures and rising operational costs, ensuring the service can maintain quality and capacity for Havering's vulnerable adults. Approval will safeguard continuity of care, support national and local strategies, and avoid the disruption and higher costs of re-procurement. This approach represents the best value and stability for both service users and the Council.

REASONS AND OPTIONS

Reasons for the decision:

Enacting the full extension period and allowing the uplift: Is the recommended option, as approving the uplift and enacting the three-year extension will ensure continuity of care and stability for vulnerable adults, particularly those with complex needs, by avoiding the disruption and disengagement risks associated with transitioning to a new provider. CGL has consistently delivered against key performance indicators and quality standards, supported by strong multi-agency partnerships and local knowledge, which enhance service responsiveness and effectiveness. This approach aligns with the national drugs strategy, supports access to effective treatment and recovery, and is based on realistic financial projections that build on previously approved increases. It also avoids the financial and administrative burden of re-procurement and potential service disruption. Performance will be robustly monitored by LBH and an improvement action plan implemented where any areas fall short.

Other options considered:

Do Nothing: If the contract is not extended and no uplift is approved, all commissioned adult drug and alcohol services in Havering would cease. This would leave vulnerable residents without access to essential prevention, treatment, and recovery support, leading to increased substance misuse-related harm, higher hospital admissions, and greater pressure on health, social care, and criminal justice services. The loss of integrated pathways and specialist support would exacerbate health inequalities, disrupt multi-agency working, and negatively impact families and communities. The Council's reputation would be damaged, and statutory and strategic responsibilities would not be met. For these reasons, the "do nothing" option is not considered viable.

Not allowing the Uplift: If the additional £501,205 funding is not secured, the service will not be sustainable, resulting in unfilled roles and increased caseloads, which will contribute to staff stress, burnout, and higher turnover, further straining service delivery. Service quality will decline as static staffing levels fail to meet rising demand, causing delays in interventions and limiting support for complex cases, ultimately reducing treatment success rates.

Operational efficiency will be compromised as collaboration and training are deprioritised, with increased absenteeism and burnout further diminishing capacity. Clients will experience longer waiting times for assessments and appointments, weakening relationships and continuity of care, and increasing frustration and disengagement. The closure of key services, such as counselling and recovery hubs, will reduce access to vital support, damage the Council's reputation, hinder recruitment, and erode public trust. Public health outcomes are likely to deteriorate, with potential increases in crime, hospital admissions, and social isolation.

Re-procuring: Ending the current service and re-procuring carries significant risks, including potential procurement failure due to affordability or lack of market interest, as cautioned by the Care Act 2014 regarding market destabilisation. Service disruption may occur, with vulnerable clients facing gaps in care and complex cases particularly at risk. The loss of CGL's established relationships, multi-agency partnerships, and local knowledge would reduce service responsiveness and effectiveness. Re-procurement would also incur substantial internal costs, including legal, commissioning, mobilisation, IT transition, and governance. Any disruption or failure in service delivery could damage the Council's reputation with residents, partners, and regulators. Given that the constitution is weighted at 70% price and 30% quality, it is highly probable that CGL will be successful in securing the tender again.

IMPLICATIONS AND RISKS

Financial implications and risks:

This report recommends that Cabinet approves a 3-year extension option within the contract for the Adults Drugs & Alcohol Service for years 26/27 27/28 28/29 with a total value over the 3-year period of £4,474,904 commencing on 1st April 2026. In doing so, it is also requesting that Cabinet approves an uplift in cost over the 3-years totalling £501,206 as compared to the base contract, to be funded from the Public Health grant.

When this contract was awarded in 2021 the contract amounts specified for years 2026-2029 were as follows:

Year	2026/27	2027/28	2028/29	Total 3 years
Original contract Cost	£1,306,509	£1,324,446	£1,342,743	**£3,973,698**

However, having reviewed the costs, the total expenditure planned is as follows:

Year	2026/27	2027/28	2028/29	Total 3 years
Uplifted contract cost	£1,464,041	£1,491,452	£1,519,411	**£4,474,904**

Therefore, the increase over the three period is as follows:

Year	2026/27	2027/28	2028/29	Total 3 years
Total Uplifted	£157,532	£167,006	£176,668	**£501,205**

It should be noted that an uplift was agreed for financial years 2024/25 and 2025/26:

Year	2024/25	2025/26	2026/27	2027/28	2028/29
Original contract Cost	£1,296,647	£1,288,923	£1,306,509	£1,324,446	£1,324,743
Uplifted contract cost	£1,418,436	£1,473,506	£1,464,041	£1,491,452	£1,591,411
Uplift	£ 121,789	£184,583	£157,532	£167,006	£176,668

Therefore, the uplifted 2026/27 contract amount of £1,464,041 delivers a saving of £9,465 against the uplifted 2025/26 amount of £1,473,506.

The uplift against the contract baseline position reflects a period of relatively high inflation between 2021 to date. Agreeing the uplift will ensure continuity of care and stability for vulnerable adults, particularly those with complex needs, and avoids the disruption and disengagement risks associated with transitioning to a new provider as well as the administrative costs associated with a re-procurement. The small saving of £9,465 between 2025/26 and 2026/27 reflects continued efforts between the Council and the provider to find savings where possible to ensure the contract continues to represent value for money. The contract is deemed to be performing well, and benchmarking suggests it provides value for money. If the additional £501,205 funding is not secured, the service in its current guise will not be sustainable.

The cost of the contract, including the uplift will be met from the Council's Public Health grant. There is a risk that if other costs currently funded by the Public Health grant increase and/or if the Council's Public Health grant allocation reduces, there will not be sufficient funding to meet the cost of this contract. This risk is mitigated by potential use of the Public Health grant (subject to necessary approvals).

Legal implications and risks:

The Council has a duty in section 12 of the Health and Social Care Act 2012 to take appropriate steps to improve the health of the people who live in its area. The Council is making a decision to extend and vary the existing contract for the adults drugs and alcohol service for that purpose.

The Council can activate the extension of a contract that has a clear, precise and unequivocal revision clause in accordance with regulation 72(1)(a) of the Public Contracts Regulations 2015. The extension is clearly, precisely and unequivocally provided for in the contract.

Appendix E for Charges contains a table of the costs for the 8 years of the contract, which are the 5 years of the initial term and the 3 years of the extension period. Clause E4 states that the amount payable to the service provider includes all costs of staff, facilities, equipment, materials and other expenses incurred by the provider as outlined in the table.

Clause B22.1 allows certain amendments and variations of the contract to be made in writing. Clause B22.2 allows either party to request a variation to the contract by sending the other party a variation notice setting out the proposed variation. Clause B22.3 states the allowed amendments and variations include adjustments to the Charges.

The proposed variation will not alter the overall nature of the contract or change the economic balance between the parties. The Council can agree to modify the contract through the proposed variation in accordance with regulation 72(1)(a) of the Public Contracts Regulations 2015.

Therefore, the Council can extend the contract and agree to the proposed variation of the contract.

Human Resources implications and risks:

The recommendations made in this report do not give rise to any identifiable Human Resources implications or risks.

Equalities implications and risks:

Havering has a diverse community made up of many different groups and individuals. The Council values diversity and believes it essential to understand and include the different contributions, perspectives and experience that people from different backgrounds bring.

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, gender, race and disability, sexual orientation, marriage and civil partnerships, religion or belief, pregnancy and maternity and gender reassignment.

The Council demonstrates its commitment to the Equality Act in its decision-making processes, the provision, procurement and commissioning of its services, and employment practices concerning its workforce. In addition, the Council is also committed to improving the quality of life and wellbeing of all Havering residents in respect of socio-economics and health determinants.

The recommendations made in this report do not give rise to any identifiable equalities and social inclusion implications or risks and therefore an (Equality and Health Impact Assessment) is not required.

Health and Wellbeing implications and Risks:

The recommendations made in this report do not give rise to any identifiable Health and Wellbeing risks. The nature of this service is about the health and wellbeing of the service users and therefore would have positive implications on those service users.

Environmental and Climate Change implications and Risks:

The recommendations made in this report do not give rise to any identifiable environmental implications or risks.

BACKGROUND PAPERS

None

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Havering
LONDON BOROUGH

PROCESS SHEET FOR EXECUTIVE DECISION REPORTS

REPORT SUBJECT/ TITLE	Permission to extend the Adults Drug & Alcohol Contract for 3 years and approval for an uplift to the contract value
DECISION DATE	**10/12/2025**
DIRECTORATE/DEPARTMENT	**Havering Integrated Team**
CHECKED FOR ACCURACY: (Content and formatting checked by person preparing the report and proof read)	**Caroline Carey** Senior Commissioner, Live Well Havering Integrated Team 13/11/2025
CHECKED FOR LEGAL IMPLICATIONS: (give details, including name of Legal Services staff member and date sign off was agreed)	**Matthew Gater** Senior Lawyer (Procurement, Contracts and Companies) Date of sign off: 14/11/2025
CHECKED FOR FINANCIAL IMPLICATIONS: (Give details of the Finance Business Partner who worked with the service on the Business Case and Provided the Financial Implications, including name of Finance staff member and date sign off was agreed. Head of Finance Sign off must also be recorded - the name and date of the sign off. In all instances Resources must be made aware of the report but otherwise deal in accordance with the Financial Framework)	**Natalie Bowie** **Strategic Finance Business Partner** Report has been cleared and comments have been added by Natalie in the Financial implications and risks section of the Report. **Date of sign off:** 13/11**/**2025
CHECKED FOR HUMAN RESOURCES IMPLICATIONS: (give details, including name of HR staff member and date sign off was agreed. In all instances Corporate HR must be made aware of the report)	**Louise Purdie** **Strategic HR Business Partner** I can confirm that the recommendations made in this report do not give rise to any identifiable Human Resources implications or risks. **Date of Sign off:13/11/2025**

CHECKED FOR IT IMPLICATIONS (if necessary)	**N/A**
CHECKED FOR HEALTH and WELLBEING IMPLICATIONS (To be completed for Key Decisions only):	**Tha Han** **Assistant Director of Public Health**
CHECKED for EQUALITIES IMPLICATIONS:	**Yes** **Gabby Lawler** 14/11/25
Note: Is an Equality Health Impact Assessment required for the proposals contained in this report? (if so, it has it been undertaken, is reflected in the report and is listed as an appendix)	**No**
SIGNED Date signed off Author of Report or Head of Service (if author):	**Caroline Carey** Senior Commissioner 13/11/2025
READ AND APPROVED BY- ELT Lead (Name, job post/title, date signed off and signature)	**Mark Ansell** **Director Public Health** **Oct 25**
Date and time received by Democratic Services	

Havering
LONDON BOROUGH

CABINET

Subject Heading:	Private Sector Housing Enforcement Scheme. New designations for Additional Licensing for Housing of Multiple Occupation and Selective Licensing
Cabinet Member:	Councillor Barry Mugglestone, Cabinet Member for the Environment
ELT Lead:	Helen Oakerbee, Director of Planning and Public Protection
Report Author and contact details:	Anand Punj Public Protection Manager anand.punj@havering.gov.uk 01708 432253
Policy context:	These proposals support Havering Council to meet its priorities as set out in the Corporate Plan 2024/27 to deliver safe and affordable housing. Property licensing is a way of tackling poor housing conditions and driving up standards to ensure safer and better managed private rented accommodation
Financial summary:	Discretionary licensing schemes cannot be used to generate income and must be cost recovery only. The administrative costs associated with the scheme and meeting scheme objectives will be fully recovered through a licence fee
Is this a Key Decision?	Yes - Decision is likely to result in significant impact on communities living or working in all wards.

When should this matter be reviewed?	There is no statutory review term stipulated. The schemes will be regularly monitored via Key Performance Indicators to ensure they are driving improvements in the Private Rented Sector.
Reviewing OSC:	Places Overview and Scrutiny 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

1.1. In 2018 and 2021 the Council introduced additional HMO licensing schemes to ensure safety standards of tenants living in smaller houses in multiple occupation (HMOs) and also a selective licensing scheme which extended licensing to all private rented properties in three wards. These schemes expire on 24 January 2026.

1.2. On 11 April 2025, Council agreed the decision to launch a statutory consultation seeking stakeholders' views on proposals to introduce a new boroughwide additional HMO licensing scheme and a selective licensing scheme of all other private rented accommodation in seven wards in the borough.

1.3. An extensive public consultation, with landlords, tenants, residents, stakeholders and other interested parties started on the14 April 2025 and ran for 12 weeks, concluding on 6 July 2025. The council used digital and print media to advertise the consultation, as well as in-person methods.

1.4. The main feedback method was via an online or paper questionnaire. The Council also hosted two virtual public meetings with landlords, tenants, residents, and landlord groups. 403 individuals or organisations completed the online or postal questionnaire. Qualitative feedback was received at deliberative meetings with interested groups and from written responses from interested parties. In summary it was found that residents (including private tenants) and businesses were in favour of the schemes and landlords letting or managing agents less in favour. Of those who returned the questionnaire 55% were residents or local businesses, 43% were landlords or agents and 2% were other stakeholders.

1.5. The consultation looked at the level of support for introducing additional HMO and selective licensing schemes, and looked at views on the proposed licence conditions, fees, scheme objectives and the respondents' perceptions on the issues affecting poor property conditions and anti-social behaviour (ASB) in the borough.

1.6. The findings of the consultation exercise are provided in the consultation report (**Appendix 2**).

1.7. This report makes recommendations in relation to designating a new additional HMO licensing scheme to the whole area of the borough and a selective licensing scheme in the seven ward areas of Beam Park, Harold Wood, Rainham & Wennington, Rush Green & Crowlands, Squirrels Heath, St Albans and St Edwards with effect from 01 February 2026.

RECOMMENDATIONS

For the reasons set out in the report and its appendices, Cabinet is recommended to:

2.1 Consider and have regard to the evidence supporting the implementation of Additional HMO and Selective Licensing schemes as detailed in the Scheme Implementation Evidence Report **(Appendix 1).**

2.2 Consider the outcome of the consultation process detailed in the Consultation Report **(Appendix 2**), the representations received and the Council's consideration and response to these representations **(Appendix 3).**

2.3 Note that the document to support undertaking this public consultation (consultation evidence pack) **(Appendix 4)** and Housing Conditions and Stressors Report (**Appendix 5)** highlight the scale of problems arising from poorly managed private rented properties, identifies the objectives that the proposed licensing schemes would help the Council achieve and alternatives to licensing which have been considered.

2.4 Upon consideration of the matters at (2.1) and (2.2) and using its powers under s.56 Housing Act 2004, agree to designate a new Additional Licensing area of the whole of the London Borough of Havering from 18/03/2026 as delineated and edged in red on the map in the draft designation in **Appendix 6** for a five-year period. (*The designation will be finalised ahead of publication).*

2.5 Upon consideration of the matters at (2.1) and (2.2) and using its powers under s.80 Housing Act 2004, agree to designate a new Selective Licensing area in the seven ward areas of Beam Park, Harold Wood, Rainham & Wennington, Rush Green & Crowlands, Squirrels Heath, St

Albans and St Edwards and from 18/03/2026 as delineated and shaded in red on the map in the draft designation in **Appendix 7** for a five-year period. (*The designation will be finalised ahead of publication).*

2.6 Agree to the proposed licensing scheme objectives as set out in **Appendix 8.**

2.7 Agree the proposed additional HMO licensing conditions that would accompany any granted HMO licence as set out in **Appendix 9.**

2.8 Agree the proposed selective licence conditions that would accompany any granted selective licence as set out in **Appendix 10.**

2.9 Agree the proposed fee structure for licence applications made under the additional and selective licensing schemes at **Appendix 11.**

2.10 Consider and have regard to the result of the Equality and Health Impact Assessment in **Appendix 12.**

2.11 Subject to the agreement of recommendations 2.4 and 2.5 above, delegate to the Director of Planning and Public Protection in consultation with the Portfolio Lead Member for Environment and where appropriate the Deputy Director of Legal and Governance, to:

a. Agree any minor changes to the proposed implementation and delivery of the schemes including administration and changes to licence fees and conditions where necessary

b.ensure all statutory notifications are carried out in the prescribed manner for the licensing designation

2.12 Agree to delegate to the Director of Planning and Public Protection in consultation with the Chief Finance Officer to approve the carry forward of any surplus or deficits to the established ring-fenced trading account each financial year for both schemes as and when necessary.

REPORT DETAIL

3. Background

3.1. Havering is consistent with the rest of London in that it has a shortage of affordable housing, with house prices remaining out of reach for many. The demand for social housing far outstrips the supply. As a result, private rented property is increasingly becoming the only viable option for many Havering residents, including those who are vulnerable and on low

incomes. Currently, 19.3% of Havering's housing stock is in the PRS, and this is expected to continue to rise in the future. Tackling poor housing conditions and improving the quality of the private rented sector is a key priority within the Council's Corporate Plan.

3.2. In addition to the national mandatory HMO licensing scheme, the Housing Act 2004 enables local authorities to designate areas as subject to discretionary licensing. There are two types of discretionary licensing schemes: Additional licensing of HMO's and Selective licensing of private rented properties.

3.3. In 2018 and 2021 the Council introduced additional HMO licensing schemes to ensure safety standards of tenants living in smaller houses in multiple occupation (HMOs) and a selective licensing scheme which extended licensing to all private rented properties in two wards. This required the licence holder to comply with conditions relating to the letting and management of the property. Such discretionary property licensing schemes can only last for a maximum of five years and these schemes expire on 24 January 2026.

3.4. Property licensing serves as a tool to raise standards and ensure safer, better-managed accommodation. It allows the Council to take a proactive approach to enforcement and inspections, rather than relying on residents to report issues. This is especially important where tenants are vulnerable and may hesitate to report disrepair or poor management practices due to the fear of eviction. Through licensing, a level playing field is created where tenants can trust that landlords are maintaining property standards. If landlords fail to do so, the Council can take necessary enforcement actions to ensure compliance.

3.5. Before the introduction of the licensing schemes, when a property or management issue arose in a property not covered by the licensing schemes, officers would spend considerable time identifying the responsible party before addressing the problem. The additional and selective licensing schemes have established clear lines of communication with the responsible parties and set enforceable standards. This has improved access to landlords, resulting in quicker resolutions of complaints and landlords taking action to improve the quality of their properties and manage them more effectively.

3.6. Through the administration and enforcement of Havering's current selective, additional and mandatory licensing schemes, the Council has made strides in improving standards in the PRS. However, evidence shows that there is a significant number of properties that remain substandard and potentially dangerous.

3.7. On 11 April 2025, the report presented to the Director of Planning and Public Protection *Consultation on proposed licensing schemes for houses in multiple occupation (HMOs) and other private rented housing* set out the evidence of the current nature of the private rented sector (PRS) in

Havering and resultant proposals, informed by the evidence, for new additional and selective licensing schemes. As a result, Council agreed the decision to launch a statutory consultation seeking stakeholders' views on these proposals.

3.8. The proposals subject to the consultation were:

- A new boroughwide additional HMO licensing scheme applicable to all "shared amenity" HMOs and many "converted building" HMOs (so called "section 257" HMOs).
- Selective licensing of all other private rented accommodation in specific wards in the borough. This designation includes the wards of Beam Park, Harold Wood, Rainham & Wennington, Rush Green & Crowlands, Squirrels Heath, St Albans and St Edwards.

3.9. An extensive public consultation, widely publicised using various channels of communication, was undertaken for 12 weeks from 14 April until 6 July 2025. Full details of the consultation are detailed in the consultation report (**Appendix 2**) which sets out how the Council conducted the consultation and the response received. As required by the Housing Act 2004, the Council must consider any representations made which are not withdrawn. The Council's response to these representations can be found in **Appendix 3**.

3.10. In order to ensure independence, the Council commissioned Cadence Innova, an independent consultancy, to undertake the consultation exercise on its proposals. Consultation activities included an online survey, live online public meetings, and outreach to key stakeholders. The exercise sought views from residents, private tenants, private landlords, lettings/managing agents, businesses and other stakeholders about the Council's proposals. Additional effort ensured that landlord's resident outside the borough were also advised of the consultation exercise.

3.11. The consultation background materials and evidence base report (Housing Conditions and Stressors Report, Metastreet 2025) highlight the substantial issues related to poor housing conditions associated with the private rented sector in Havering, and that inadequate management of HMOs significantly contributes to substandard property conditions. These documents were made available during the consultation to support the proposals and can be found in **Appendices 4 and 5**.

3.12. Consultation and publicity activities included:

i. online questionnaire
ii. paper copies of the questionnaire made available in ten libraries across the borough
iii. two virtual public meetings held with landlords, tenants, residents, and landlord groups
iv. articles in e-newsletters

v. outdoor advertising campaign using Global Media, Clear Channel and JC Decaux sites across Havering, Bexley, Barking & Dagenham, Epping, Brentwood and Thurrock
vi. leaflet drop to businesses and residential properties in key areas of the borough
vii. direct email sent to known landlords, letting and leaseholders in the borough
viii. posters, leaflets and pull up banners displayed in children's centres and foodbanks
ix. dedicated email address for written feedback

3.13. The Council also used digital and social media to advertise the consultation, ensuring that landlords residing outside the borough were also consulted.

3.14. The consultation generated 403 responses from the online questionnaire. The online forums were widely publicised and 190 people registered to attend the events and a total of 143 people attended. Three written representations were received from stakeholder organisations and one letter of support for the schemes was received from another borough council.

REASONS AND OPTIONS

4. Proposed Additional HMO licensing designation

4.1. During the consultation exercise, the Council set its proposals for a new boroughwide additional licensing scheme to apply to most types of HMOs. HMOs licensable under national mandatory HMO licensing are not included.

4.2. The new scheme will include more HMOs than in the previous one. The HMOs required to be licensed in the new designation are as follows:

- All HMOs that are rented to three of more occupiers in two or more households that share (or lack) toilet, washing and cooking facilities (section 254 HMOs).
- Converted building HMOs (section 257 HMOs), where the conversion did not comply with the relevant Building Regulations in force at that time and still does not comply; and less than two thirds of the flats are owner occupied.

4.3. From the consultation, 59% of online survey respondents supported the Council's proposal to introduce a new additional HMO licensing scheme.

This varied from 89% of other stakeholders and 69% of residents (including private tenants) and business being in support of the scheme compared to 45% of landlords and lettings/managing agents. Overall, 31% of respondents were against the proposals.

4.4. The majority of survey respondents (47-60%) agreed that additional HMO licensing would help to address issues in the PRS (including improving conditions, safety of tenants and tackling neighbourhood problems such as ASB) with 35-46% of landlords and lettings/managing agents not agreeing.

4.5. 74% of residents (including private tenants) and business felt that the scheme would identify poorly performing landlords and letting agents over the five-year period.

4.6. In the freetext parts of the survey, some respondents including both residents (including private tenants) and business and landlords, voiced concerns about the cost of licensing and that it would be passed on to tenants. Another common theme emerging was the need for the schemes to be underpinned by effective enforcement.

4.7. Having carefully considered the consultation representations there are no changes recommended in regard to the proposals to introduce a boroughwide additional HMO licensing scheme.

4.8. The proposed additional licensing designation can be found in **Appendix 6.**

Proposed Selective licensing designation

4.9. During the consultation exercise, the Council proposed a new selective licensing scheme that would cover a single designation. The scheme would apply to all private rented sector properties that are not included in the mandatory or additional licensing schemes.

4.10. The designation consists of seven wards (Beam Park, Harold Wood, Rainham & Wennington, Rush Green & Crowlands, Squirrels Heath, St Albans and St Edwards) which covers 34.5% of the geographical area of the borough and 49.7% of the total private rented sector in Havering.

4.11. The selective licensing proposals were supported by 41% of survey respondents. This varied from 78% of other stakeholders and 63% of residents (including private tenants) and business being in support of the scheme compared to 10% of landlords and lettings/managing agents. Overall, 47% of respondents were against the proposals.

4.12. 36-50% of survey respondents agreed that selective licensing would help to address issues in the PRS over the next five years (including improving the physical conditions of properties, health and safety of tenants, and assisting landlords to raise their standards). However, most landlords and

lettings/managing agents (58-71%) did not agree with the potential benefits of selective licensing.

4.13. 68% of residents (including private tenants) and business felt that the scheme would identify poorly performing landlords and letting agents over the five-year period.

4.14. As with additional HMO licensing, some respondents expressed concerns about the cost of licensing being passed on to tenants. Similarly, respondents from all the main groups expressed the need for the effective enforcement of the schemes.

4.15. Having carefully considered the consultation representations there are no changes recommended in regard to the proposals to introduce the selective licensing designation.

4.16. The proposed selective licensing designation can be found in **Appendix 7.**

Proposed Licence conditions

4.17. Property licences are issued with licence conditions which the licence holder must comply with. The conditions are a combination of those which local authorities must impose (mandatory conditions by law), and those which they have a power to impose. Draft licence conditions were available for persons to comment on during the consultation.

4.18. The consultation asked respondents for their views on the proposed licence conditions. The overall majority of respondents, 47%, agreed with the proposed additional HMO licence conditions, while 26% of respondents disagreed. In regard to the selective licensing conditions a majority of respondents, 44% agreed with the proposed licence conditions, while 38% of respondents disagreed.

4.19. During the consultation the Council received feedback in relation to the proposed licence conditions via free text comments and written representations. The Council's consideration of the feedback received, is detailed in the Council's response to the consultation (**Appendix 3**).

4.20. Having carefully considered the consultation representations there are no changes recommended in regard to the proposed additional or selective licence conditions **(Appendices 9 and 10).**

Proposed Licence Fees

4.21. The landlord or managing agent will be required to pay a licence fee for each property requiring a licence in the designated area. The proposed additional HMO licensing fee is £1,400. The proposed selective licensing fee is £950.

4.22. Licences will normally be granted for the duration of the scheme (up to five years). Where the council has concerns about the management and use or occupation of the property a licence for a shorter period may be granted, usually for 1 year.

4.23. The proposed fee schedule was made available for persons to comment on during the consultation. It set out the fees the Council was proposing to charge, together with a number of discount rates available. These included a £100 discount for accredited landlords, a £100 multi-dwelling discount and a £75 discount for properties with an EPC rating of C or higher.

4.24. In regard to additional licensing, 21% of respondents thought that the proposed fee is about right and 45% thought that it is too high. 56% of other stakeholders and 29% of residents (including private tenants) and business thought the fee was about right. However, 76% of landlords, letting and managing agents thought that the fee is too high.

4.25. In regard to selective licensing, 21% of respondents thought that the proposed fee is about right and 52% thought that it is too high. 44% of other stakeholders and 33% of residents (including private tenants) and business thought the fee was about right. However, 93% of landlords, letting and managing agents thought that the fee is too high.

4.26. For the accredited landlord discounts, 45% of respondents thought it was too low. This varied between 74% of landlords, letting and managing agents, 24% of residents (including private tenants) and business and 22% of other stakeholders.

4.27. For the EPC rating discount, 47% of respondents thought it was too low. This varied between 76% of landlords, letting and managing agents, 25% of residents (including private tenants) and business and 11% of other stakeholders.

4.28. For the multi-dwelling discount, 39% of respondents thought it was too low. This varied between 61% of landlords, letting and managing agents, 23% of residents (including private tenants) and business and 0% of other stakeholders.

4.29. Concerns over fees were strongly expressed by landlords (as well as some tenants) in the free text parts of the survey, with comments including ‘Landlord licences are nothing but another tax…’, ‘The proposed £950 per property licensing fee is excessive’, ‘Licensing schemes often penalise compliant landlords’ and ‘Landlords will pass any charges to the tenants’. The Council’s response to these representations can be found in **Appendix 3**.

4.30. Having carefully considered the consultation representations the Council is not proposing to make any changes to the proposed fee structure which can be found in **Appendix 11.**

Objectives of the proposed schemes

4.31. The Council proposes to use the additional HMO and selective licensing schemes to continue to improve housing conditions and management standards in the PRS, and increase awareness for tenants of the minimum standards they should expect in in rented accommodation and what their other rights are when renting in the PRS. Information about the scheme objectives was provided within the consultation documents and detailed in **Appendix 8.**

4.32. The property licensing schemes provide the framework for the Council to achieve its objectives. The schemes will ensure that landlords adopt a more hands-on approach to tenancy management of their privately rented homes. Licence conditions will require licence holders to meet obligations related to the letting and proactive management of their properties.

4.33. Properties will be inspected and the Council will ensure that any Category 1 and 2 hazards identified are remediated and that licence conditions are complied with.

4.34. The Council aims to work proactively with landlords and property owners to improve property conditions. This will be achieved through a collaborative effort involving the local authority and other agencies. Officers will work with multidisciplinary teams and internal and external stakeholders, including the Police, to identify properties of concern and improve property conditions.

4.35. The consultation asked respondents for their views on the proposed licensing scheme objectives. The overall majority of respondents, 43%, agreed with the proposed scheme objectives, while 37% of respondents disagreed.

5. Other options considered:

5.1. A local authority must not make an additional HMO or selective licensing designation unless consideration has been given to other courses of action available to them that would achieve the objectives they would want the designation(s) to achieve.

5.2. The Council has considered a number of other courses of action or alternatives to the licensing proposals, but do not believe that, individually or collectively, they provide an effective, or as effective means of tackling poor conditions and raising the standard of management within HMOs in the borough. The alternative options considered are set out in the Council's consultation evidence documents (**Appendix 4**) and a summary of these alternatives is as follows:

I. **Use of Part 1 Housing Act 2004 powers to deal with enforcement of housing standards** – Formal statutory notices can be served that

require improvements to a property. If the notice is not complied with the council can carry out works in default or may prosecute the landlord. Works in default can however be expensive and resource intensive for the Council, with the risk that not all costs are recovered. Formal action is generally slow, with appeal provisions against most types of notices served, which can significantly delay the time period for compliance. These powers alone would be insufficient to tackle the scale of the problems in the private rented sector in Havering.

II. **Rely on prosecutions and civil penalties** – Successful prosecutions or the imposition of civil penalties do not in themselves secure improvements in property conditions and the Council's costs in pursuing legal action are not always met in full. These powers are reactive and do not place any obligation on landlords to be proactive in improving conditions within a property. The absence of licensing significantly reduces the scope of the Council to impose civil penalties in respect of identified housing breaches.

III. **Wider promotion of voluntary accreditation landlord schemes -** We recognise that accredited landlords are key to raising standards in private sector housing, and encourage all landlords to become accredited and achieve a level of knowledge and competence before letting a home. However schemes require voluntary landlord engagement, our experience is that compliant landlords become accredited; rogue landlords do not proactively participate in such schemes.

IV. **Use of Improvement grants to improve substandard properties** - Grants can be used to subsidise improvement works, raising standards and providing benefits for landlords and tenants.. However, generally there are few grants available, and the Council has very limited scope to offer grants through successful external funding bids. In the most part, grant awards would fund improvements that the landlord should be carrying out to meet their legal obligations. Any grant scheme would be discretionary and would rely on voluntary landlord engagement.

V. **Use of ASB powers** - Formal notices can be served at addresses identified as having ASB issues. This can resolve ASB at the particular address. Action would generally be taken against the tenant in occupation. The powers do not place any obligations on landlords to be proactive in managing their properties to prevent or reduce the likelihood of ASB occurring.

VI. **Use of new powers made available by the Renters Rights Bill -** Although the Council will gain additional powers to address standards in the private rented sector, the Renters Rights Bill does not establish a proactive approach to housing standards. It still relies on tenants to report issues and landlords to be transparent about problems. In areas like Havering, where affordable accommodation is scarce, tenants are

less likely to complain for fear of jeopardising their housing situation. Additionally, the specifics of the proposed legislative changes, any impact on licensing schemes and their implementation timeline are still unknown. Consequently, relying on the Governments proposed reforms is not deemed a viable option.

5.3 Property licensing schemes will place the responsibility on the landlord to inform the Council that their property is licensable and encourage them, with the Council's support, to ensure that they meet the required standards. The Council can then prioritise its resources effectively to dealing with those properties of most concern and target enforcement actions to those landlords who fail to licence their properties and/or breach licence conditions.

5.4 Respondents were also asked whether there were any alternatives to licensing that should be considered. A major theme was that the Council should focus on using its existing powers rather than designate further discretionary licensing schemes. The Council's response to these representations can be found in Appendix 3.

5.5 The Council has carefully considered the consultation feedback and representations. The Council is committed to improving housing standards in the private rented sector and considers that the proposed additional HMO and selective licensing schemes are critical to the prospects of achieving its objectives. No other alternatives have been identified that would, individually or collectively, be capable of delivering the scheme objectives that the Council would achieve through the operation of additional HMO and selective licensing schemes.

IMPLICATIONS AND RISKS

6. Financial implications and risks:

6.1 The Cabinet paper proposes to introduce two discretionary schemes following consultation with stakeholders:

a. Additional Licensing HMO Scheme
b. Selective Licensing Scheme

The earliest this will likely be implemented is 18th March 2026 as it requires a minimum three-month period to pass after authority approval. There are two existing schemes which are due to end on the 24th January 2026.

6.2 In setting the fee the Council has had regard to the Provision of Service Regulations 2009 and sections 63(7) and 87(7) of the Housing Act 2004

which confirms that "when fixing fees the local authority may take into account all costs incurred by the authority in carrying out their functions".

6.3 The Regulatory Impact Assessment on licensing makes it clear that authorities should not use fee income to raise additional revenue, the fees should be set for cost recovery of the scheme.

6.4 The proposed licence fees will be sufficient to cover the estimated costs of establishing and administering the schemes and the undertaking of any enforcement action. It should also provision for costs of winding down the scheme, for example, redundancy costs should the scheme not be replaced.

6.5 It is the Council's intention to grant all property licences for a period of five years starting from the date they are granted, unless the Council considers a shorter period is appropriate where specific criteria is met such as a history of non-compliance. Where necessary licence holders will be advised of this separately.

6.6 Evidence from current licensing schemes supports that applications are consistently received throughout the scheme designation and continue to be received well into year 5 of the designation.

6.7 The model assumes that although the scheme is for 5-year licences there is an ongoing licence enforcement and management requirement over the life of the licence, even though the selective licensing scheme will cease and no new licences issued from year 6 onwards. The costs of resourcing the schemes in years 6 -10 will reduce in line with the number of licences that need to be managed and enforced during this period.

6.8 The licence fee will cover the owner of the property for a period up to 5 years, however, should ownership of the property be transferred within that period, a further licence fee will be payable by the new owner.

6.9 The actual financial position of the scheme against the budget will be robustly reviewed on an annual basis. This will be undertaken as part of the Council fees and charges process to ensure that the fees remain reasonable and proportionate. The Council is aware that any consistent surplus must be used to adjust fees in upcoming years, although some reinvestment over more than a year is permitted. This balance will be assessed in the yearly review and adjustments made accordingly if required.

6.10 The expenditure relates to additional staff for process applications (including recruitment and training), carry out inspections of premises, the cost of dealing with appeals against licensing decisions and other costs associated with ensuring compliance with the scheme.

<u>House in Multiple Occupancy (HMO) – Additional Licensing</u>

6.11 The proposed HMO additional licensing fee is £1,400. The fee is levied in two parts. Part A of the fee (£840) is charged when the licence application is made and covers the costs of processing, administration and validation of the application. Once the decision to grant the licence is made, Part B of the fee (£560) is charged which covers the costs of the administration, management, and enforcement of the licensing functions for the scheme.

6.12 Over the 5-year scheme life, the anticipated income is estimated at £0.723m. The modelling shows this is expected to cover the costs of the scheme.

Selective Licensing Scheme

6.13 The proposed selective licensing fee is £950. The fee is levied in two parts. Part A of the fee (£570) is charged when the licence application is made and covers the costs of processing, administration and validation of the application. Once the decision to grant the licence is made, Part B of the fee (£380) is charged which covers the costs of the administration, management, and enforcement of the licensing functions for the scheme.

6.14 Over the 5-year scheme life, the anticipated income is estimated at £6.431m. The modelling shows this is expected to cover the costs of the scheme.

Financial Risks

6.13. There is the potential risk of a significant under recovery of income and a failure to effectively achieve the schemes objectives if the Council does not receive the estimated number of applications and related fees. This risk has been mitigated by ensuring that sufficient staffing resources are allocated to identifying unlicensed properties.

6.14. Should the number of licences vary from those anticipated, and/or the profile of applications change, the resourcing requirement will need to be flexed to manage any pressure this creates within existing budgets by the service.

6.15. The fees set, and the financial model created by our consultants, are based on the assessments and evidence specific to Havering and does not allow comparison to other Councils, due to variations around property numbers, costs associated with each council (e.g. salaries, on costs, ICT, back office etc.), approach and operations.

6.16. It should be noted that these discretionary schemes are an area under increasing risk of judicial review and challenge across the Country. It is therefore prudent for the authority to continue to review annually its relevant cost basis for supporting these two distinct schemes and if necessary, update the appropriate cost recovery fees through the appropriate mechanisms to ensure the schemes meet cost recovery

criteria. It is essential that cross subsidy between schemes and other duties of the authority are avoided.

6.17. There is also a financial risk to the authority should the decision not be to approve these schemes or a delay occurs. This is because there is a minimum three-month period from approval to commencement of the scheme. As some of the resources to operate the new scheme would be transferring from existing schemes there would be no funding to support those costs. Therefore, a potential pressure on the General Fund.

7. Legal implications and risks:

Additional licensing of HMOs

7.1 Under section 56 of the Housing Act 2004, the Council may designate an area as subject to additional HMO licensing if it is satisfied that a significant proportion of the HMOs that it proposes to make subject to licensing are being managed sufficiently ineffectively as to give rise, or be likely to give rise, to one or more particular problems either for those occupying the HMOs or members of the public.

7.2 Before making the designation, however, the Council must: a. consider whether there are any other courses of action available to it (of whatever nature) that might provide an effective method of dealing with the problem or problems in question (section 57), b. consider that making the designation will significantly assist the Council to deal with the problem or problems, whether or not it takes any other course of action as well (section 57), c. ensure that any exercise of its power is consistent with its overall housing strategy (section 57), d. seek to adopt a co-ordinated approach in connection with dealing with homelessness, empty properties and anti-social behaviour affecting the PRS, both as regards combining licensing with (i) other courses of action available to the Council and (ii) measures taken by other persons (section 57), e. take reasonable steps to consult persons who are likely to be affected by the designation (section 56), and f. consider any representations made in accordance with the consultation and not withdrawn (section 56).

Selective Licensing

7.2. Section 80 of the Housing Act 2004 and the Selective Licensing of Houses (Additional Conditions) (England) Order 2015 sets out the criteria and considerations that the Council must be satisfied are met when considering designating a selective licensing area. These general conditions are:

- That the area is, or is likely to become, an area of low housing demand
- That the area is experiencing a significant and persistent problem caused by antisocial behaviour
- The area has poor housing conditions

- The area has high levels of migration
- The area has high levels of deprivation
- The area has high levels of crime.

7.3. Article 4 of The Selective Licensing of Houses (Additional Conditions) (England) Order 2015 sets out the conditions relating to poor housing conditions. These conditions are:

- Having carried out a review of housing conditions, the local housing authority considers it would be appropriate for a significant number of the properties to be inspected, with a view to determining whether any category 1 or category 2 hazards exist on the premises
- The local housing authority intends to carry out such inspections with a view to carrying out any necessary enforcement action
- Making a designation will, when combined with other measures taken in the area by the local housing authority, or by other persons together with the local housing authority, including any licence conditions imposed, contribute to an improvement in general housing conditions in the area

7.4. Before making the designation, however, the Council must: a. consider whether there are any other courses of action available to it (of whatever nature) that might provide an effective method of dealing with the problem or problems in question (section 81), b. consider that making the designation will significantly assist the Council to deal with the problem or problems, whether or not it takes any other course of action as well (section 81), c. ensure that any exercise of its power is consistent with its overall housing strategy (section 81), d. seek to adopt a co-ordinated approach in connection with dealing with homelessness, empty properties and anti-social behaviour affecting the PRS, 37 both as regards combining licensing with (i) other courses of action available to the Council and (ii) measures taken by other persons (section 81), e. take reasonable steps to consult persons who are likely to be affected by the designation (section 80), and f. consider any representations made in accordance with the consultation and not withdrawn (section 80)

7.5. With effect from 23 December 2024 a new General Approval came into force and local housing authorities in England are no longer required to obtain confirmation from the Secretary of State before implementing a selective licensing scheme of any size.

7.6. The local housing authority must, however, still satisfy all statutory requirements contained in Part 3 of the Housing Act 2004. In addition, local authorities will be expected to consult for a period of at least 10 weeks on the proposed designation. This has been met as set out in this report. As part of the best practice guidance included in the General Approval, local housing authorities in mayoral strategic authority areas are requested to include their mayor in the consultation process on the proposed

designation. Local authorities are expected to consider any representations made by the mayor, whilst retaining the final decision-making process themselves. The Mayor of London was subsequently consulted in regard to the Council's proposals. The response from the Mayor's Office, outlining the mayors support of Havering's selective licensing proposals is attached as **Appendix 13.**

7.7. The government updated non-statutory guidance on selective licensing on 23 December 2024. This guidance explains the criteria for making a selective licensing scheme and discusses the type of evidence needed to support a designation. It sets out what a local authority would expect a scheme to deliver in terms of the economic and social conditions of the designated area and how during the period of the designation this will be evaluated. It also explains the processes that need to be complied with before a designation can be brought into force – see https://www.gov.uk/government/publications/selective-licensing-in-the-private-rented-sector-a-guide-for-local-authorities/selective-licensing-in-the-private-rented-sector-a-guide-for-local-authorities

7.8. Certain types of tenancies/licences are exempt from selective licensing, and these are set out in section 79 of the Housing Act 2004 and the Selective Licensing of Houses (Specified Exemptions) (England) Order 2006.

Consultation requirements

7.9. Sections 56(3) and 80(9) of the Housing Act 2004 requires that that when considering designating an additional HMO or selective licensing area the local housing authority must take reasonable steps to consult persons who are likely to be affected by the designation, and consider any representations made in accordance with the consultation and not withdrawn.

7.10. In line with the case of **R v London Borough of Brent ex parte Gunning**, (as affirmed and endorsed by the Court of Appeal in R v North and East Devon Health Authority ex parte Coughlan [1999] EWCA Civ 1871, four principles must be met in order for there to be a legitimate consultation, specifically online consultations (the Gunning Principles); these are:

i. the proposals were consulted on at a formative stage (a final decision has not been made or predetermined),
ii. sufficient information and reasons have been given for the proposals to enable the consultees to consider them and respond intelligently,
iii. adequate time has been allowed for consideration and response for participants,
iv. 'conscientious consideration' has be given to the consultation responses before a final decision is made, providing evidence this has been undertaken.

7.11. Additionally, the Supreme Court in **R ex parte Moseley v LB Haringey [2014]** UKSC 56 endorsed the Gunning Principles and also added two further general principles:

v. The degree of specificity regarding the consultation should be influenced by those who are being consulted.

vi. The demands of fairness are higher when the consultation relates to a decision which is likely to deprive someone of an existing benefit. Additionally, recent case law it is emerging that those affected by the proposals must be consulted: R (on the application of National Council For Civil Liberties) -v- Secretary of State for The Home Department and Public Law Project (Intervener) [2024] EWHC 1181 (Admin)

7.12. Before making any decision, Cabinet must be satisfied that the above principles have been met. Cabinet must also have due regard to the responses received through the consultation undertaken and take those into account when making its' decision. Additionally, Cabinet must also consider whether there are any other courses of action available to it that would achieve the same objective or objectives as any proposed scheme without the need for the designation to be made.

7.13. If both of the designations are implemented they may, in principle, be challenged by way of judicial review. Given the consultation feedback on licence fees and licence conditions a challenge may arise in these areas. However given the involvement of independent consultants and the strong evidence base collated the risk is reduced. The Council would need to consider alternative options in the event of a successful challenge. The time limit for issuing a claim for judicial review is three months from the date of the designation. If the new designations are not in force by the expiry of those currently in existence, the Council runs the risk of the designations being unenforceable for a period of time.

7.14. Regulation 4 (1) of The Rent Repayment Orders and Financial Penalties (Amounts Recovered) (England) Regulations 2017 states a local housing authority may apply any financial penalty recovered under section 249A of the 2004 Act to meet the costs and expenses (whether administrative or legal) incurred in, or associated with, carrying out any of its enforcement functions in relation to the private rented sector.

Other criteria to be met prior to designating additional and selective licensing schemes.

7.15. For both additional and selective licensing designations, the Council must also be satisfied that:

- the proposed designations are consistent with the overall housing strategy,

- a co-ordinated approach is adopted in dealing with homelessness, empty properties, and ASB
- can demonstrate how licensing will work in conjunction with existing initiatives (such as landlord accreditation) and partnerships

Duration and notification of a licensing scheme

7.16. If a designation is confirmed, it cannot come into force until three months after it is made.

7.17. The introduction of a selective licensing scheme may be delayed up to an additional 3 months, if need be, to prepare for the scheme's implementation. This is to avoid an excessive delay between the consultation and the scheme's introduction, to ensure consultation requirements are met and persons who are likely to be affected by the designation have been consulted.

7.18. Section 59 and 83 of the Act requires local housing authorities to publish a notice of the designation once it has been confirmed. A local housing authority must:

- publish a notice within the designated area within seven days of the designation being confirmed.
- notify all those consulted on the proposed designation within two weeks of the designation being confirmed.

7.19. A designation ceases to have effect no later than 5 years after the date on which it comes into force.

Providing data to MHCLG

7.20. Local authorities must provide data to MHCLG at the start and end of selective licensing schemes. At the commencement, they need to report the scheme's dates, location, type (new/renewal), number of PRS properties, proportion of PRS stock covered, designation criteria, and licensing fees. At the end, they must report the total number of licenses issued, value of fees, costs, and how the scheme addressed its objectives, including performance against KPIs, case studies, or review outcomes.

Renters Rights Bill

7.21. It is envisaged that upcoming legislative changes and the introduction of a new PRS database will have a positive effect on the introduction of additional and selective licensing schemes. Officers are mindful of the need to ensure there is no duplication. An example of this could be uploading the same safety certificates as part of a licence application. Upcoming changes will be kept under review to ensure that unnecessary burdens are not placed on landlords. It is likely the database will lead to improved intelligence, particularly when it comes to targeting unlicenced properties and conducting compliance checks.

Local authority review of an additional HMO licensing scheme

7.22. Section 60(3) of the Act requires local housing authorities to review the operation of an additional HMO designation made by them from time to time and if appropriate the designation may be revoked, if the council does so, they must publish a notice of the revocation in such manner as is prescribed by regulations.

Local authority review of a selective licensing scheme

7.23. Section 84(3) of the Act requires local housing authorities to review the operation of a selective designation made by them from time to time. As part of the best practice guidance included in the General Approval, local authorities are requested to publish the outcome of any reviews that they undertake in respect of the selective licensing scheme(s) in a timely manner on their website. If following a review, they consider it appropriate to do so, they may revoke the designation.

7.24. The reviews of both schemes will include looking at the licence fees and licence conditions etc.

Delivering Policies, Plans and Strategies:

Havering Corporate Plan

7.25. Havering Council's Corporate Plan 2024-2027 focuses on three priorities:

- People - Supporting our residents to stay safe and well: Aims to enhance health, support youth, and protect vulnerable groups by promoting preventive healthcare, mental health support, and improved care for at-risk children.
- Place - A great place to live, work and enjoy: Seeks to improve public safety, provide affordable housing, and maintain public spaces, focusing on safety initiatives and environmental sustainability.
- Resources - Enabling a resident-focused and resilient Council: Emphasises digital transformation, better data use, and efficient resource management, including updating systems and enhancing service transparency.

An additional and selective licensing scheme will contribute to the Council's priorities and assist in achieving its key ambitions and deliver better standards for private renters. Licensing schemes promote healthier, safer neighbourhoods, sustainability through energy efficiency standards, and equality by ensuring safe, healthy living conditions for all residents regardless of tenure.

Havering Housing Strategy

7.26. The Council is currently developing a new Housing Strategy for 2025 onwards. The draft strategy recognises there are many housing challenges facing Havering and seeks to address these challenges in the following way:

- Set out a plan to meet the diverse and evolving housing requirements of Havering informed by the latest data and projections.
- Focus is on the provision of new homes to keep up with the rising costs and affordability challenges of PRS.

The draft Housing Strategy identifies the need to provide better standards for private renters. Eliminating poor performing private sector landlords throughout the borough remains a priority, and the Council will seek to implement new licensing measures to drive improvements into this crucial part of the borough's housing offer.

Havering Homelessness and Rough Sleeping Strategy

7.27. Like many areas, Havering is under increasing pressure to find suitable temporary accommodation for families. Havering Prevention of Homelessness Strategy 2020-25 and Rough Sleeping comprehensively sets out Havering's approach, based around four objectives:

Objective 1: End long-term rough sleeping
Objective 2: Reducing the number of people in temporary accommodation
Objective 3: Supporting people who become homeless
Objective 4: Provide good value, integrated services that deliver excellent customer care.

Through the implementation of an additional and selective licensing scheme, the Council will be able to enhance its work with landlords, improving their professionalism and understanding of legal obligations. This, along with tenant education on rights and responsibilities, will support tenancy sustainment in the PRS and help in reducing homelessness in the borough.

Empty Homes Programme

7.28. As part of the draft Housing Strategy, we have made a commitment to making better use of existing homes. The Council recognises that empty properties are a wasted resource for both the community and the owner and can cause a variety of issues such as reducing the supply of housing and attracting ASB. Bringing empty properties back into use is a priority for the Council and clamping down on those landlords that keep homes empty for years on end is a key step to increasing the supply and availability of affordable homes in the borough.

7.29. Bringing empty properties up to standard and back into use as decent livable homes is complementary to the objectives of the proposed additional and selective licensing schemes.

Anti-Social Behaviour

7.30. As outlined in the Havering Corporate Plan, 2024 – 27, we are committed to working with tenants, residents and external partners to ensure that steps are taken to tackle ASB. The borough's Corporate Plan vision is one where Havering is 'A great place to live, work and enjoy' and where the Council 'Seeks to improve public safety, provide affordable housing, and

maintain public spaces, focusing on safety initiatives and environmental sustainability'.

7.31. To tackle ASB problems, we have made it conditional on all private landlords who hold licences under the additional HMO or selective licensing schemes to prevent and combat ASB associated with properties they manage. Section 57(5) of the Housing Act 2004 gives a definition of ASB for the purposes of licensing under Parts 2 and 3 of the Act.

7.32. Additional and Selective Licensing will enable the Council to encourage landlords to work with their tenants to reduce ASB. Information and support will be available both online and through forums.

Licensing working in conjunction with existing initiatives and partnerships

7.33. The Council will continue to build on the good working relationship with internal and external partners. The Council have engaged in several joint working initiatives and partnerships with agencies such as the London Fire Brigade, Metropolitan Police, Immigration Enforcement, Housing Solutions, Social Services, Planning Enforcement, Trading Standards and ASB teams, NRLA, Safer Renting and Justice for Tenants. The Council will also continue to actively promote the London Landlord Accreditation Scheme (LLAS) and provide discounts to accredited landlords.

7.34. In addition to the above criteria, when making a selective licensing designation the council must:

- demonstrate a co-ordinated approach is adopted in dealing with regeneration (housing market renewal activity).
- consider any potential negative economic impact that licensing may have on the area, and

Regeneration Strategy

7.35. Havering Council has developed a comprehensive regeneration strategy aimed at transforming various areas within the borough to enhance community living, infrastructure, and economic vitality. Key components of the regeneration programme include:

- building modern, energy-efficient homes and well-connected neighbourhoods that are right for our borough
- providing new, high quality Council housing and increasing the amount of family-sized homes
- providing infrastructure to support new homes
- increasing opportunities for home ownership for Havering residents
- supporting healthy communities, fit for future generations
- supporting and investing in our local economy to create a thriving place
- protecting and celebrating our history and heritage
- We are also committed to improving the existing housing stock that we have.

Private property licensing schemes will act as a regulatory tool to ensure that landlords in regenerating areas maintain high property standards, supporting regeneration goals of creating more sustainable, inclusive, and well-maintained communities.

Potential negative economic impact

7.36. There is no evidence to suggest that the introduction of the Council's current discretionary licensing schemes has had a negative impact on the borough. An independent review of the Use and Effectiveness of Selective Licensing commissioned by MHCLG (2019) determined that there was no substantive evidence of rent rises being passed onto tenants due to the introduction of selective licensing schemes. If selective licensing is extended to other wards in the borough, no negative economic impacts are anticipated. It is considered that selective licensing, when combined with other measures taken in the designated areas will have a positive economic impact rather than negative by contributing to improved housing conditions.

8. Human Resources implications and risks:

8.1 There are no Human Resource implications or risks associated directly with this report.

9. Equalities implications and risks:

9.1. The Council has a public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act.
- Advance equality of opportunity between people who share those protected characteristics and people who do not.
- Foster good relations between people who share those characteristics and people who do not.

9.2. A full Equality and Health Impact Assessment (EHIA) has been carried out and is attached at **Appendix 12**. The EHIA has taken account of the consultation process, the information gathered through that process and assessed the impact that the recommendations could have on different protected groups and, where possible, identified methods for mitigating or avoiding any adverse impact on those groups.

9.3. Applications for the licensing scheme will be made online. However, appropriate measures will be taken to ensure accessibility for individuals who require reasonable adjustments. This includes, but is not limited to, providing assistance where needed to complete the online application, offering alternative formats and ensuring the scheme can be accessed in a variety of ways to remove potential barriers

10. Health and Wellbeing implications and Risks

10.1 Havering Council is committed to protecting and improving the health and wellbeing of its residents and through the implementation of the proposed property licensing schemes it is anticipated there will be a number of positive impacts on the health and wellbeing of tenants living in private rented properties.

10.2 It is estimated that poor housing costs the NHS in the UK at least £1.5bn per year. By addressing poor housing conditions this will help to improve health and wellbeing, reduce health inequalities, and prevent and reduce demand for primary health care and social care interventions, including admission to long-term care settings. This will produce a quantifiable cost saving to health and social care budgets. https://ageing-better.org.uk/news/fixing-englands-dangerous-homes

10.3 The Covid-19 pandemic has also shown correlations between susceptibility to the virus and poor-quality housing. Therefore, good quality housing can do much to help combat the spread of covid-19, as well as other illnesses such as cancer, respiratory and cardiovascular diseases.

10.4 It is also well understood that poor housing conditions and overcrowding have a negative impact on educational attainment. This in turn impacts on an individual's ability to reach their full potential. It is expected that licensing will assist the Council and partners in achieving objectives in improving educational attainment and residents achieving their full potential.

ENVIRONMENTAL AND CLIMATE CHANGE IMPLICATIONS AND RISKS

The Council has set an ambitious target of becoming a carbon neutral organisation and borough by 2040.

The Havering Climate Action Plan recognises the link between fuel poverty and energy and emissions, and that better insulating homes and making them more energy efficient are key actions in combatting both. Under public protection, part 6, there is focus on comfortable, affordably heated, cost-efficient homes.

If approved the private property licensing schemes designations will have a positive environmental impact and will contribute to achieving Havering's climate change vision by enforcing energy efficient standards in the PRS, helping to reduce the overall energy consumption and carbon emissions of the borough.

BACKGROUND PAPERS

1. Non-Key Decision – Consultation Approval
2. The Housing Act 2004
3. The Housing and Planning Act 2016
4. The Selective Licensing of Houses (Specified Exemptions) (England) Order 2006
5. Selective licensing in the private rented sector, a guide for local authorities, MHCLG, December 2024

APPENDICES

No.	Title
Appendix 1	Additional HMO and Selective Licensing Schemes - Implementation Evidence Report
Appendix 2	Consultation Report
Appendix 3	Council response to comments received during public consultation
Appendix 4	Consultation Evidence Pack
Appendix 5	Housing Conditions and Stressors Report, Metastreet 2024
Appendix 6	Additional HMO Licensing Designation
Appendix 7	Selective Licensing Designation
Appendix 8	Licensing Scheme Objectives
Appendix 9	Additional HMO Licence Conditions
Appendix 10	Selective Licence Conditions
Appendix 11	Schedule of Fees and Charges
Appendix 12	Equality and Health Impact Assessment
Appendix 13	Representation from Mayor of London



Havering Council

Property Licensing Schemes Implementation Evidence Report

October 2025

CADENCE INNOVA

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Executive Summary

This report presents a comprehensive analysis and evidence to support Havering Council's proposal to introduce a selective licensing scheme for all privately rented homes (excluding HMOs) within 7 out of 20 wards to address the prevalence of poor housing conditions, and a borough-wide additional HMO licensing scheme.

The proposed schemes are a proactive measure designed to raise housing standards within the private rented sector, ensure tenant safety, and foster safer, more cohesive communities. Landlords in the designated areas will be required to obtain a licence, meeting specific conditions that guarantee the quality and safety of rental properties. By instituting clear accountability, the schemes are expected to drive improvements in property maintenance, reduce anti-social behaviour, and safeguard vulnerable tenants from exploitation and unsafe living conditions.

Aligned with Havering Council's broader strategic objectives and consistent with national and local housing policies, the proposed property licensing schemes aim to raise housing standards, protect vulnerable residents, and foster safer, well-managed communities. The introduction of the schemes will directly support key priorities around wellbeing, placemaking, and environmental sustainability.

This report outlines the rationale behind the proposals, including the evidence of current challenges in the private rented sector and the legislative framework underpinning the schemes. It also highlights the expected outcomes and benefits, including enhanced housing standards, improved tenant welfare, and the promotion of community regeneration. The selective and additional licensing schemes represent a targeted, strategic response towards addressing the challenges faced by both tenants and landlords in the most affected areas of Havering, and is a vital step towards delivering the council's long-term vision of creating "The Havering you want to be part of" .

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1. Introduction

The London Borough of Havering is an outer London borough located on the northeastern boundary of Greater London. It covers an area of 112.3km^2 and borders Essex to the north and east, the unitary authority of Thurrock to the southeast and the London Boroughs of Redbridge and Dagenham & Barking to the west and Bexley to the southwest across the river Thames.

Havering is a largely suburban area and one of the greenest of London boroughs as well as being the third largest.

Between the last two censuses (held in 2011 and 2021), the population of Havering increased by 10.4%, from around 237,232 in 2011 to around 262,000[1] in 2021.
GLA projections suggest that Havering's population is set to slowly grow from the 2021 census figure – by 2031 it is expected to reach 277,880 continuing that growth trend with 279,865 forecast by 2041[2].

Consistent with the long term and nationwide trend, the private rented sector (PRS) in Havering has grown steadily from 11% in 2011 to 19% in 2024 (Figure 1).

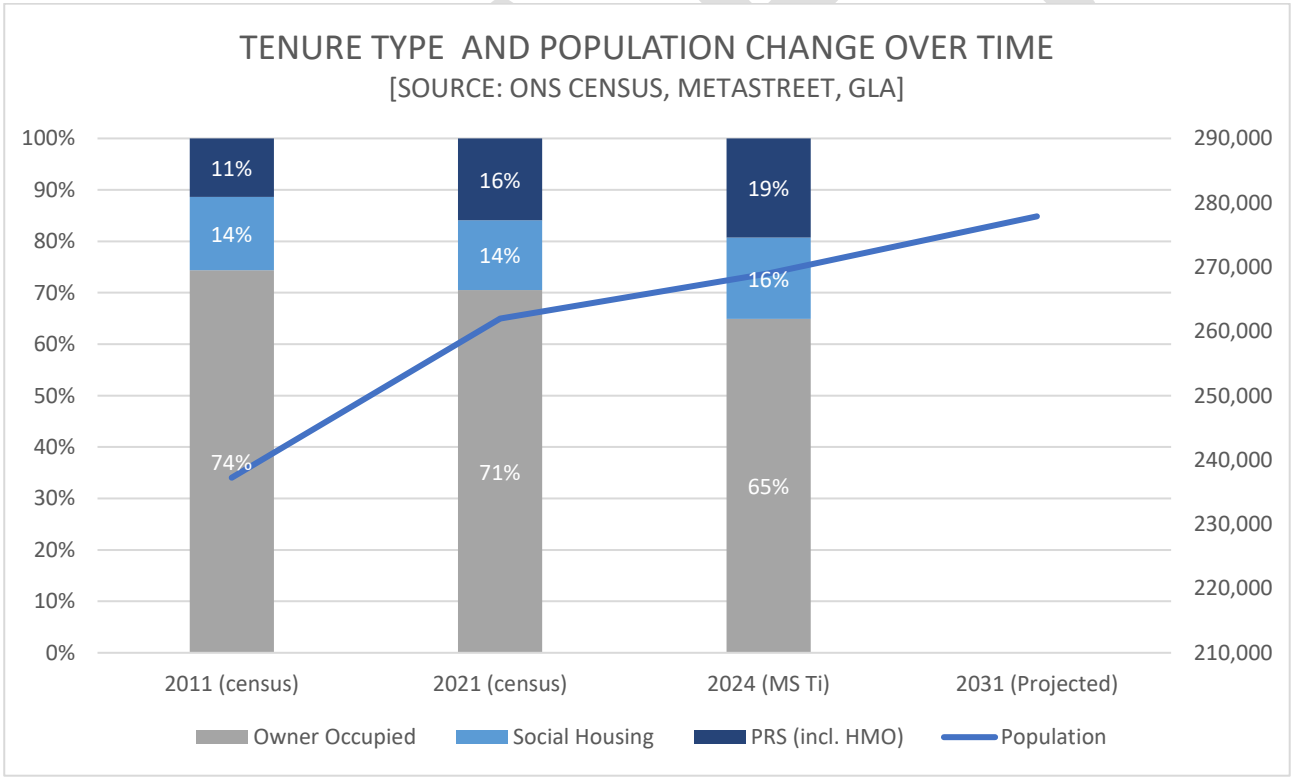


Figure 1: The change in housing stock in Havering from 2011 to 2024

Tenure modelling carried out in October 2024 predicts Havering's PRS to have increased as a proportion of all housing stock at 19% from the previous census in 2021 (Figure 1). The percentage of PRS properties in each ward ranges between a maximum of 44.6% (St. Albans) and a minimum of 9.1%% (Cranham) (Figure 2). Therefore, 7 out of 20 wards in the borough have a

[1] Havering population change, Census 2021 – ONS
[2] GLA Population Projections (london.gov.uk)

higher percentage PRS than the national average in 2024 (19%). The average rate of PRS across all wards is 19.3%.

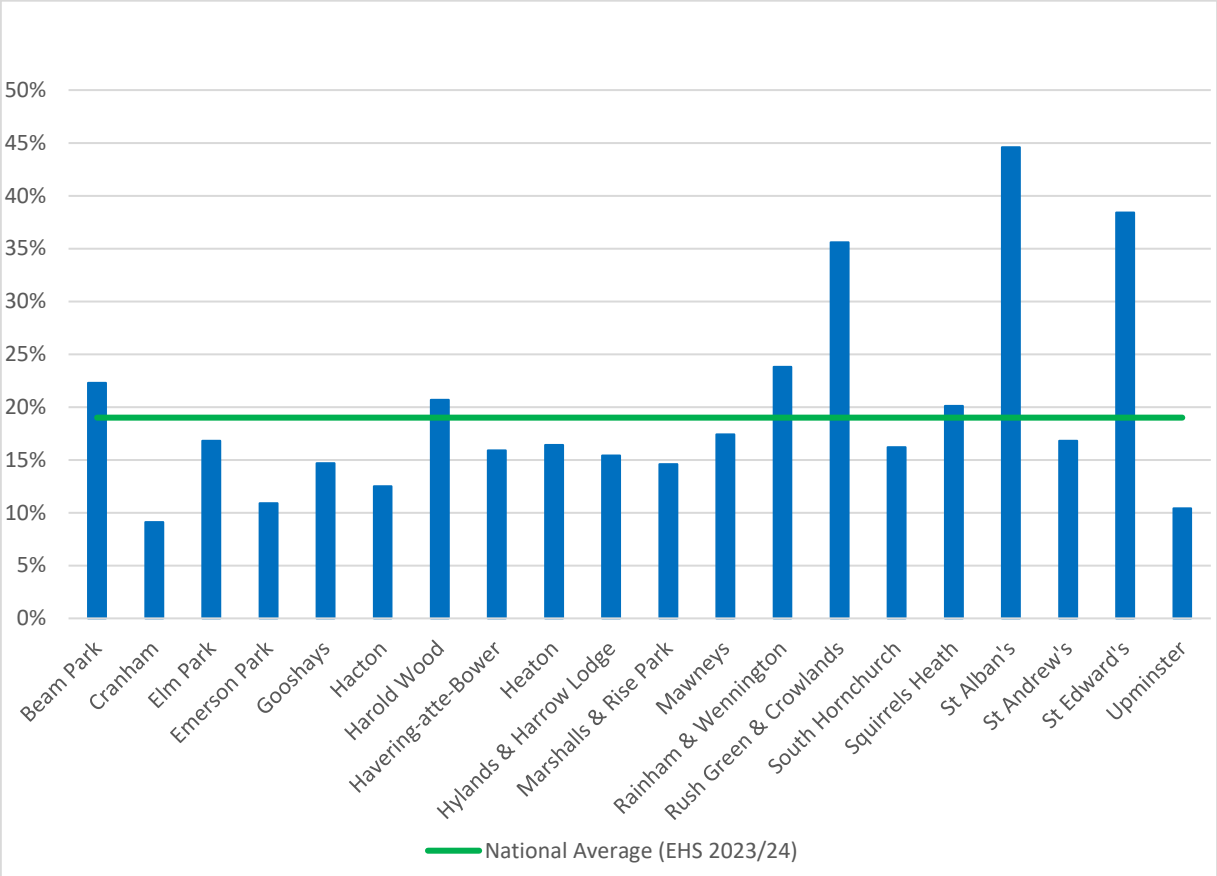


Figure 2: Percentage of PRS in all wards [Source: Metastreet 2024]

The growth of the private rented sector has gone hand in hand with huge increases in rent across London over the last 20 years. This has resulted in residents not being able to afford and access decent, affordable housing. Havering has above average rents nationally with 33.2% of median earnings used to pay rent. This is lower than the London average of 46.4% but higher than the average for England of 24.9%.

Havering Council is on a journey dedicated to tackling some of the most serious issues facing its vulnerable residents in the PRS. In addition to the national mandatory HMO licensing scheme, in 2018, Havering implemented an additional HMO licensing scheme covering 12 wards (Scheme 1) which ran from 2018 to 2023 and a further additional licensing scheme (Scheme 2) running from 2021 to 2026 covering the remaining 6 wards, to ensure safety standards for tenants living in small houses in multiple occupation (HMOs).

Havering also have a current Selective Licence scheme for Brooklands and Romford Town (2021 – 2026). As a result of the ward changes in May 2022 these are now 3 wards: Rush Green and Crowlands, St Alban's & St Edward's (2021-2026). The Council's licensing schemes have made some progress in improving property standards for residents living in the PRS and demonstrate the Council's commitment to robust enforcement of standards. The pilot selective licensing scheme and the previous additional HMO scheme have demonstrated the importance of these schemes but also shone a light into how much work is still to be done.

2. Proposals for a selective licensing scheme

A proposed selective licensing scheme is the next phase of a strategic plan to make targeted improvements to the PRS where poor property conditions remain prevalent. As such, the Council is using the legislative tools available to ensure that those living in the PRS are not left behind with its plan to improve all housing in the borough. To achieve this, the Council is adopting a strategic approach to private sector licensing across the borough and is proposing to introduce a selective licensing scheme consisting of a single designation, covering 7 of the 20 wards in the borough, and a borough-wide additional licensing scheme.

The proposed seven wards in the selective licensing designation are:

- Beam Park
- Harold Wood
- Rainham & Wennington
- Rush Green & Crowlands
- Squirrels Heath
- St Alban's
- St Edward's

These wards are experiencing high levels of poor housing conditions.

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3. Proposed selective licensing scheme designation area

3.1 Metastreet and ONS Census 2021 data

To understand the current state of Havering's housing stock, Metastreet Ltd. were commissioned to undertake an independent detailed review across the borough and assess housing stressors relating to key tenures, particularly the PRS. A stock-modelling approach based on metadata and machine learning was used to provide predictive insights about the:

- Current levels of PRS properties in Havering and tenure change over time
- Levels of serious housing hazards in the PRS (Category 1 / high Category 2 hazards)
- Other housing related stressors including service demand, population and deprivation linked to the PRS.

The detailed methodology used to create tenure intelligence is outlined on page 20 of the Housing stock and stressors report, **Appendix 1.**

The data from this review has been used as the foundation for the designation and was the data which Havering used for its scheme consultation.

On the 28 June 2022, the Office for National Statistics (ONS) released Census 2021 population and household estimates, and on 5th January 2023, housing datasets (incl. accommodation type, tenure, rooms and bedrooms, central heating). Therefore, where available, Census 2021 data sets have been provided as a useful comparator to the Metastreet data.

It should however be noted that the data will not be identical as there is a range of error (as is the case with all mathematical models). Also, the census was taken in March 2021, during the third national Covid lockdown. This is likely to have had a significant impact on London's PRS student population, young people on furlough, and migrant workers who may have temporarily relocated to family homes outside of London, resulting in these populations not being properly recorded by the census. The cross-party group, London Councils warns that the number of Londoners is likely to have been significantly undercounted with the census data suggesting that London's total population in March 2021 was almost 300,000 (3%) lower than the ONS previous population projection for 2021[3]. Whilst some of the Metastreet and Census data differs, both datasets demonstrate that Havering's proposals are robust.

3.2 Options Appraisal

To ensure the decision-making process regarding the inclusion and exclusion of specific wards in the selective licensing scheme was both robust and evidence-based, several datasets and methodologies were employed. The proposed scheme is therefore based on a combination of quantitative data from the Housing Stock and Stressors Report and qualitative insights from officers with localised knowledge.

The primary dataset used to assess housing conditions across the borough was the Housing Stock and Stressors Report. This report is essential for identifying areas where the conditions of rented properties may pose significant risks to tenants. The Council paid particular attention to the

[3] https://www.local.london/census-2021/ + https://www.onlondon.co.uk/census-figures-for-london-should-be-treated-with-extreme-caution-says-cross-party-body/

severity and frequency of predicted hazards within each ward. Wards predicted to have higher levels of serious hazards (those that exceed national averages) were prioritised for inclusion in the selective licensing scheme. Conversely, wards that did not exhibit high levels of housing hazards, even with substantial numbers of private rented properties, were considered for exclusion.

Qualitative insights from officers with localised knowledge who are familiar with the local area and the conditions within individual wards, provided valuable context that allowed for a more nuanced interpretation of the data. This insight was crucial in refining the scope of the selective licensing scheme.

Having carefully considered the evidence the Council is proposing to introduce a selective licensing scheme consisting of a single designation, covering 7 of the 20 wards in the borough. The proposed designation equates to 34.5% of the borough's geographical area. Refer to Table 1 below.

	Ward	Area km2 [LBH Ward Data 2024]	No. of PRS properties including HMOs [Census 2021]	No. of PRS properties including HMOs [Metastreet 2024]
Designation	Beam Park	2.04	237	758
	Harold Wood	9.08	1,006	1241
	Rainham & Wennington	18.76	896	1301
	Rush Green & Crowlands	3.75	1,567	2235
	Squirrels Heath	2.98	1,171	1366
	St Alban's	1.09	1,233	1625
	St Edwards	1.83	1,292	1948
Wards excluded from scheme	Cranham	5.29	484	494
	Elm Park	4.12	861	1108
	Emerson Park	3.51	290	387
	Gooshays	7.79	811	1018
	Hacton	1.80	354	499
	Havering-atte-Bower	10.87	754	979
	Heaton	3.23	855	1153
	Hylands & Harrow Lodge	2.95	637	899
	Marshalls & Rise Park	3.96	536	765
	Mawneys	3.02	777	1006
	South Hornchurch	2.95	565	643
	St Andrew's	2.88	1,070	1093
	Upminster	22.54	619	494
	Totals	**114.44**	**16,015**	**21082**
	Total in selective scheme designation	39.5	7,402	10474
	% in selective scheme designation	34.5%	46.2%	49.7%

**Figures are correct to 2 d.p.*

Table 1: Geographical area and percentage (%) PRS by ward

According to Metastreet data, the designation in this application will cover 49.7% of private rented properties in the local authority area, including HMOs (Table 1). Census data shows it to be marginally lower at 46.2%.

3.3 The exclusion of thirteen wards from the selective licencing scheme

The thirteen wards of Cranham, Elm Park, Emerson Park, Gooshays, Hacton, Havering-atte-Bower, Heaton, Hylands & Harrow Lodge, Marshalls & Rise Park, Mawneys, South Hornchurch, St Andrew's and Upminster, are currently not being included in the selective licensing scheme proposals. Although these wards have the high levels of housing hazards that are observed in other parts of the borough, the proportion of PRS falls below the 19% threshold required for consideration under the selective licensing criteria. As such they do not meet the necessary conditions to be included within the selective licensing designation,

3.4 General Approval 2024

With effect from 23 December 2024 a new General Approval came into force and local housing authorities in England are no longer required to obtain confirmation from the Secretary of State before implementing a selective licensing scheme of any size. The local housing authority must, however, still satisfy all statutory requirements contained in Part 3 of the Housing Act 2004.

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4. Overview of proposed scheme designation

4.1 Number of properties affected

The proposed selective licensing scheme designation covers 7 out of 20 wards in the borough. Metastreet tenure modelling data (2024) predicts that there is a total of 21,082 PRS properties in the borough of which 10,474 properties would fall within the scheme designations (Table 1).

Census 2021 shows the total number of privately rented properties (including HMOs) in the borough to be lower at 16,015 of which an estimated 7,402 would fall within the selective licensing scheme. Excluding known HMOs (370) this equates to an estimated 10,104 properties which will be affected by the scheme.

Havering's PRS inevitably includes a proportion of temporary accommodation procured by other Councils and charities; the number of properties is often difficult to measure due to the varied procurement pathways and nature of accommodation e.g., houses for victims of domestic abuse. This has been mitigated against as Havering is signed up to the pan-London temporary accommodation inspection service, 'Setting the Standard', which separately inspects properties used by local authorities as temporary accommodation to ensure that this accommodation is safe and in good condition. The Private Sector Housing team is informed of any temporary accommodation properties that have category 1 hazards, and PHS officers work closely with colleagues in the Temporary Accommodation team, regularly discussing issues or properties that require joint action.

4.2 Types of properties affected

A local authority's property age profile can have an impact on housing conditions. Havering has a high number of residential properties (41.9%) built pre-Second World War (see Figure 3 below). It is highly likely that a significant number of these properties suffer from category 1 hazards, such as excess cold, poor fire prevention, mould and damp. There is a gradient of risk with the age of the property, the risk being greatest in dwellings built before 1850, and lowest in the more energy efficient dwellings built after 1980[4].

[4] Housing Health and Safety Rating System, Operating Guidance, 2006

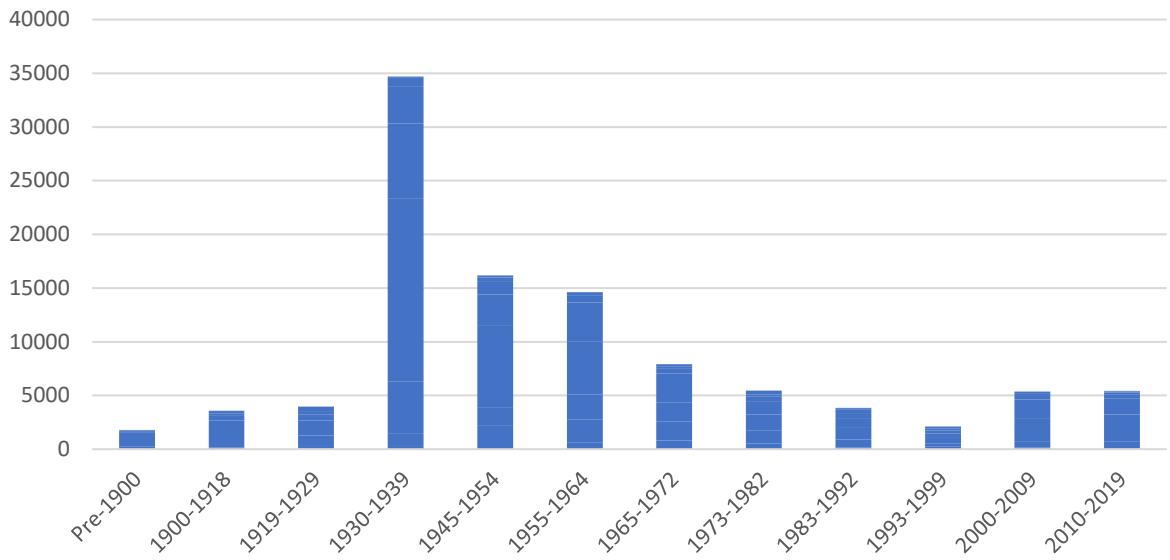


Figure 3: The age profile of Havering's housing stock (%) for all tenures [Source: Valuation Office Agency 2019]

The most common private rented property type in the borough is houses (Figure 4) which make up 47% of the housing stock, followed closely by flats at 43% whilst bungalows are the least common type of properties at 4%.

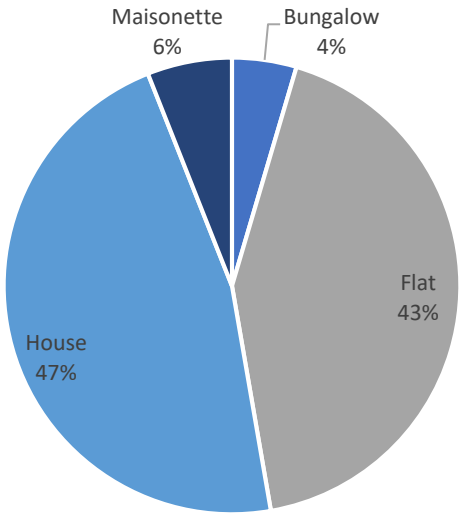


Figure 4: Types of private rental property in Havering as a percentage of the total

4.3 Designation map

The proposed area covers the 7 wards highlighted in yellow on the map below. The wards represent two geographically coherent areas incorporating central and southwestern parts of the borough.

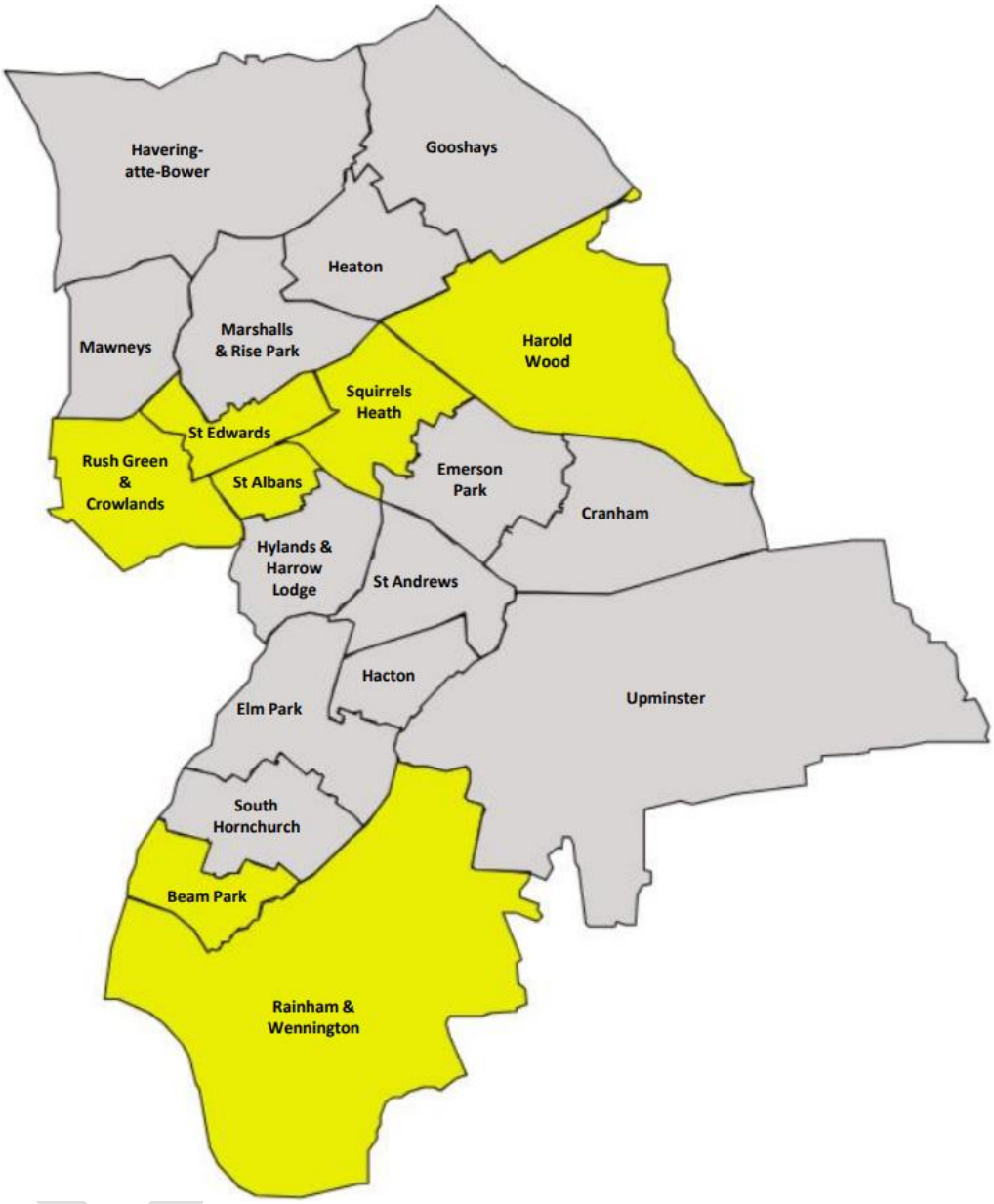


Figure 5: Ward map of Havering with proposed designation

4.4 Other licensing schemes currently operating in the borough

Mandatory HMO licensing scheme

Havering currently operates the national mandatory HMO licensing scheme. There are currently 382 licensed mandatory HMOs operating in the borough. The Council works proactively through communication, publicity, and enforcement so that all mandatory HMOs are licensed.

Additional HMO licensing scheme

In addition to the national mandatory HMO licensing scheme, Havering has implemented two additional licensing schemes. The first scheme was introduced on 1 March 2018 across 12 wards. This scheme expired on 28 February 2023. A second additional licensing scheme was introduced on 25 January 2021 and applied to the remaining wards not designated in scheme 1. This scheme expires on 24 January 2026.

Both scheme designations applied to all HMOs that do not fall within the scope of mandatory HMO licensing, including all properties shared by three or four people who are not related and share facilities. This includes flats within purpose-built blocks that were previously exempt from licensing under mandatory licensing and section 257 HMOs.

Selective Licensing

Selective licensing is another type of discretionary licensing available to local authorities under Part 3 of the Housing Act 2004. It, requires those managing or having control of other privately rented accommodation - excluding those already licensed by HMO schemes, to obtain a licence to let their property. This includes, but is not necessarily limited to, properties rented to either an individual, a single family or two unrelated sharers.

In January 2021, Havering also introduced a Selective Licensing scheme covering Brooklands and Romford Town. As a result of the ward boundary changes in May 2022 these areas are now represented by 3 wards: Rush Green and Crowlands, St Alban's & St Edward's. This scheme will expire at the same time as the HMO additional licensing scheme 2 – 24 January 2026.

Since the introduction of these licensing schemes, more than 4,070 licences have been granted.

Licence type	Licences granted
Mandatory	382
Additional	241
Selective	3,453
Total	**4,076**

Table 2: Property Licences granted in Havering

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5. The legislative framework

5.1 Conditions for introducing selective licensing

Part 3 of the Housing Act 2004 (the Act) sets out the framework for licensing private rented properties in a local housing authority area. Under section 80 of the Act a local housing authority can designate the whole or any part or parts of its area as subject to selective licensing. Where a selective licensing designation is made, it applies to privately rented housing in the area.
A selective licensing designation may be made if the area to which it relates satisfies one or more of the following conditions. The area is one experiencing:

- low housing demand (or is likely to become such an area)
- a significant and persistent problem caused by anti-social behaviour
- poor housing conditions
- high levels of migration
- high level of deprivation
- high levels of crime

Should a local authority be considering designating an area on the following grounds:

- poor housing conditions and/or
- migration
- deprivation
- crime

Then the local housing authority may only make a designation if the area has a high proportion of housing in the private rented [5]Nationally the private rented sector currently makes up 19% of the total housing stock in England. The actual number of privately rented properties in each area may be more or less than this, and if it is more than 19%, the area can be considered as having a high proportion of privately rented properties.

It is also a statutory requirement that the properties referred to are occupied either under assured tenancies or licences to occupy.

Before designating a selecting licensing scheme, the Council must also be satisfied that:

- the proposed designations are consistent with the overall housing strategy,
- a co-ordinated approach is adopted in dealing with homelessness, empty properties, regeneration and ASB associated with privately renting tenants
- there are no alternative courses of action available that would achieve the objectives that the designation is intending to achieve, and
- can demonstrate how licensing will work in conjunction with existing initiatives (such as landlord accreditation) and partnerships.

[5] https://www.gov.uk/government/publications/selective-licensing-in-the-private-rented-sector-a-guide-for-local-authorities/selective-licensing-in-the-private-rented-sector-a-guide-for-local-authorities

5.2 Consultation requirements

Section 80(9) of the Housing Act 2004 requires that that when considering designating a selective licensing area the local housing authority must take reasonable steps to consult persons who are likely to be affected by the designation, for a period of at least 10 weeks and consider any representations made in accordance with the consultation and not withdrawn.

5.3 Duration and notification of a licensing scheme

If a designation is confirmed, it cannot come into force until three months after it is made. The introduction of the scheme may be delayed up to an additional 3 months, if need be, to prepare for the scheme's implementation. This is to avoid an excessive delay between the consultation and the scheme's introduction, to ensure consultation requirements are met and persons who are likely to be affected by the designation have been consulted.

Section 59 of the Act requires local housing authorities to publish a notice of the designation once it has been confirmed. A local housing authority must:

- publish a notice within the designated area within seven days of the designation being confirmed.
- notify all those consulted on the proposed designation within two weeks of the designation being confirmed.

A designation ceases to have effect no later than 5 years after the date on which it comes into force.

5.4 Providing data to MHCLG

Local authorities must provide data to MHCLG at the start and end of selective licensing schemes. At the commencement, they need to report the scheme's dates, location, type (new/renewal), number of PRS properties, proportion of PRS stock covered, designation criteria, and licensing fees. At the end, they must report the total number of licenses issued, value of fees, costs, and how the scheme addressed its objectives, including performance against KPIs, case studies, or review outcomes.

5.5 Local authority review of a selective licensing scheme

Section 84 (3) of the Act requires local housing authorities to review the operation of a designation made by them from time to time. As part of the best practice guidance included in the General Approval, local authorities are requested to publish the outcome of any reviews that they undertake in respect of the selective licensing scheme(s) in a timely manner on their website. If following a review, they consider it appropriate to do so, they may revoke the designation.

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5.6 Proposed Scheme Criteria

The Council is proposing to designate its selective licensing scheme under the following criteria:

Designation	Designation Criteria
1	Poor housing conditions

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6. Demonstrating compliance with legislative criteria: Poor Housing Conditions

6.1 Criterion: Poor Housing Conditions

A selective licensing scheme being proposed under the poor housing conditions criteria must provide evidence of the following:

(a) that the area contains a high proportion of properties in the private rented sector, in relation to the total number of properties in the area
(b) that the properties referred to in sub-paragraph (a) are occupied either under assured tenancies or licences to occupy
(c) that having carried out a review of housing conditions under section 3(1) of the 2004 Act, the local housing authority considers it would be appropriate for a significant number of the properties to be inspected, with a view to determining whether any category 1 or category 2 hazards exist on the premises
(d) that the local housing authority intends to carry out such inspections as referred to in sub-paragraph (a), with a view to carrying out any necessary enforcement action; and
(e) that making a designation will, when combined with other measures taken in the area by the local housing authority, or by other persons together with the local housing authority, including any licence conditions imposed under section 90 of the 2004 Act, contribute to an improvement in general housing conditions in the area.

Poor housing conditions is a criterion for the designation

The proposed designation has high levels of poor housing conditions and meets the statutory requirements for this criterion in the legislation and guidance cited above. To satisfy the requirements for designating an area for selective licensing on the grounds of poor housing conditions, the Council must show that:

The area contains a high proportion of properties in the PRS, in relation to the total number of properties in the area.

All wards in the proposed designation have a high proportion of properties in the PRS when compared with the average in England of 19%[6]. Overall, 19.3% of the housing stock in the entire borough (including HMOs) is privately rented and the proposed designation contains 49.7% of the privately rented housing stock.

In accordance with Metastreet tenure modelling, the wards in the designation have a predicted PRS in the range of 20.1% (Squirrels Heath) to 44.6% (St Alban's); which is higher than the English Housing Survey national average (England) of 19%.

[6] English Housing Survey - 2023/24 - Intro and Key Findings

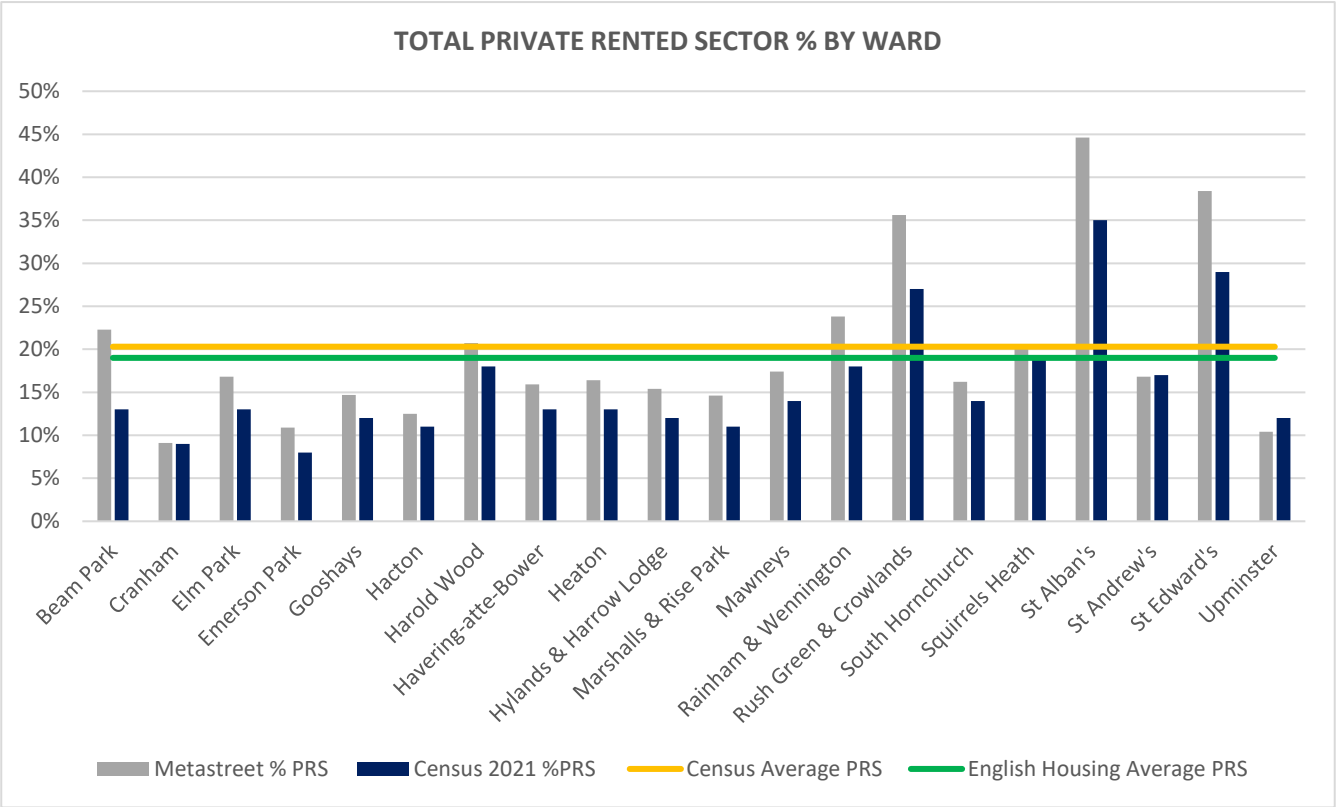


Figure 6: PRS percentage of total housing stock by ward

	Metastreet [2024]	
Ward	**No. of PRS properties including HMOs**	**% PRS properties including HMOs**
Beam Park	758	22.30%
Harold Wood	1,241	20.70%
Rainham & Wennington	1,301	23.80%
Rush Green & Crowlands	2,235	35.60%
Squirrels Heath	1,366	20.10%
At Alban's	1,625	44.60%
St Edward's	1,948	38.40%
Total	**10,474**	**49.68%**

Table 3: Total Percentage (%) of PRS properties in designation – Source: Metastreet

Have homes which are let on assured tenancies or licences

Although no formal data is available, since the Housing Act 1988, Assured Shorthold tenancies are the most common type of tenancy in the private rented sector. The Council's Housing Needs Service and Private Sector Housing Teams day-to-day on the ground experience supports this finding as most tenants they deal with are assured shorthold tenants. Based on the professional experience of officers, the council are satisfied that a high proportion of private rented properties in the borough are rented out as assured tenancies or licences.

That having carried out a review of housing conditions under section 3(1) of the Act, the local housing authority considers it would be appropriate for a significant number of the properties in the private rented sector to be inspected, with a view to determining whether any category 1 or category 2 hazards exist on the premises, with a view to taking any necessary enforcement action.

By reviewing the housing conditions under section 3(1) of the Act, it was found that the 7 wards across Havering have high levels of poor housing conditions. The Housing Stock and Stressors report demonstrates that 2,192 (21%) private rented properties (excluding HMOs) in these 7 wards are predicted to have a serious hazard (category 1 and high scoring category 2 hazards), compared to the national average of 10%. This is impacted further by a lack of affordable housing and high rents as a proportion of median earnings, meaning tenants often don't have a choice when it comes to living in sub-standard accommodation.

Havering considers it appropriate to inspect a significant number of these properties to determine whether category 1 or 2 hazards exist and then take the necessary enforcement action to remediate the hazards identified. The Council's existing powers rely on tenant complaints and therefore cannot proactively inspect properties and work with landlords to improve property standards in the borough at the scale the Council believes is needed. This licensing scheme would allow the Council to prioritise enforcement action under Part 1 of the Act and use licence conditions under Part 3 to ensure that the properties are properly managed to prevent further deterioration of the PRS.

The Council will improve properties in the designation using a combination of informal and formal actions, including the service of statutory housing and public health notices, civil penalties and prosecutions for the worst and most severe cases, alongside other Council strategies.

That making the designations will, when combined with other measures taken in the area by the local housing authority, including any licence conditions imposed under section 90 of the 2004 Act, contribute to an improvement in general housing conditions in the area.

Making these designations, combined with enforcement, licence conditions, other Council strategies and joint working with partners, will contribute to an improvement in general housing conditions in the area. (See sections 6, 7, 8, 9, 11 and 12).

6.2 Review of housing conditions

An independent Housing Stock Report was commissioned by the Council in exercise of its duty to review housing conditions in its area under section 3(1) of the Act (Appendix 1). A stock-modelling approach based on metadata and machine learning was used to provide predictive insights about the prevalence and distribution of serious hazards (category 1 and high scoring category 2 hazards) in the borough's private rented sector. The model used data including previous housing complaints and enforcement activity, energy performance data, and other property-related data indicating poor property conditions.

The housing stock review found that in these proposed 7 wards, 2,192 properties (excluding HMOs) are likely to have at least one serious hazard. Due to the nature of these types of hazards, they will be endangering the health and safety of the properties' occupants. According to the English Housing Survey Headline Report 2023-24, 10% of privately rented dwellings have at least one serious category 1 hazard, assessed using the Housing Health and Safety Rating system (HHSRS) under Part 1 of the 2004 Housing Act. All the 7 wards in the designation have levels of

serious housing hazards that are above the national average of 10%[7]. This is shown in Figure 7 and Table 4 below. From the experience of council officers, these properties are also highly likely to also have at least one category 2 hazard.

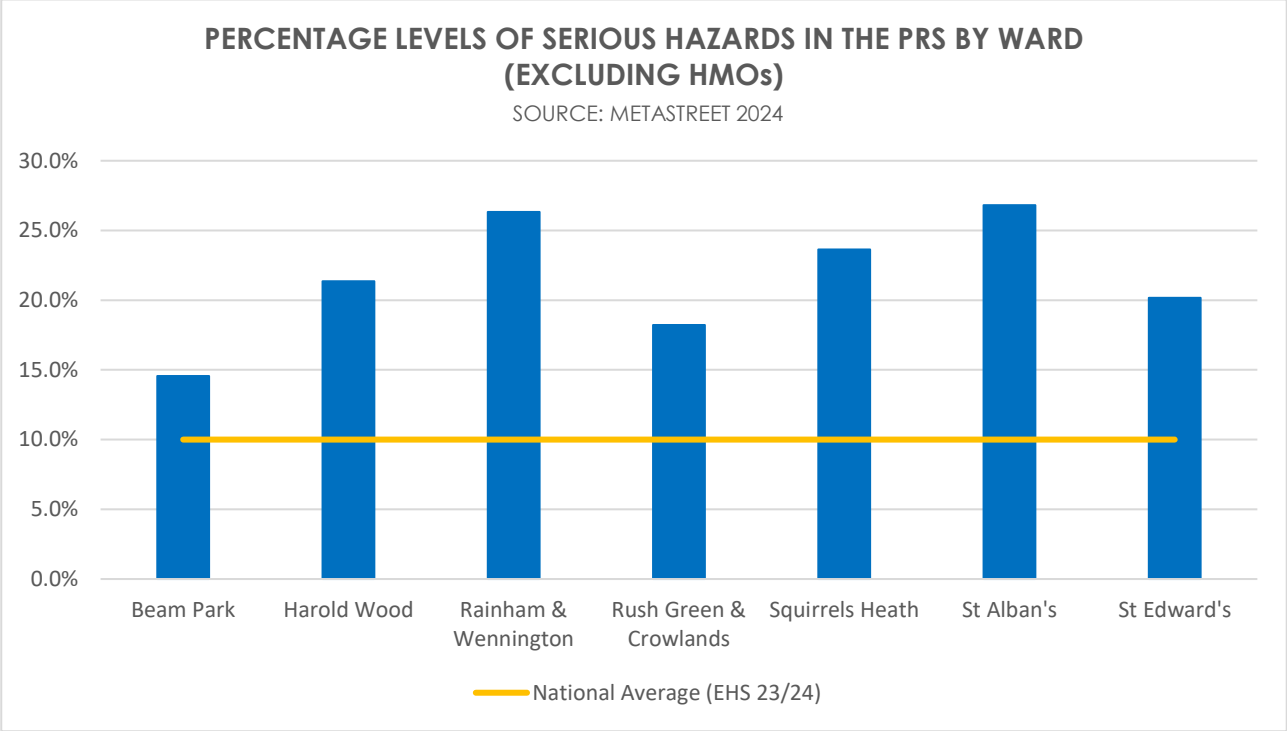


Figure 7: Predicted levels of serious hazards in the PRS by wards proposed in the scheme (excluding HMOs)

Levels of predicted PRS and serious hazards in designation area [Source: Metastreet 2024]				
Ward	% PRS (excluding HMOs)	No. of PRS (excluding HMOs)	% of PRS with at least 1 serious hazard (excluding HMOs)	No. of PRS with at least 1 serious hazard (excluding HMOs)
National average	19%[8]		10%[9]	
Beam Park	21%	728	15%	106
Harold Wood	20%	1194	21%	255
Rainham & Wennington	23%	1242	26%	327
Rush Green & Crowlands	34%	2146	18%	391
Squirrels Heath	19%	1320	24%	312
St Alban's	43%	1570	27%	421
St Edwards's	37%	1884	20%	380
Total	**49.4%**	**10084**	**21.7%**	**2192**

[7] English Housing Survey 2023 to 2024 - Headline Findings
[8] English Housing Survey 2023 to 2024: headline findings on demographics
[9] English Housing Survey 2023 to 2024 - Headline Findings

Table 4: Levels of predicted PRS (%) and serious hazards in designation area

6.4 Damp and mould

Damp and mould are one of 29 hazards assessed under the HHSRS. The HHSRS is a tool used to assess risks in residential properties. Hazards assessed at the most dangerous level using issued Government guidance are classified as 'category 1'. All other assessable hazards that are judged to be significantly worse than average are 'category 2' hazards. Local authorities have a duty under the Act to take enforcement action on category 1 hazards and a power to take enforcement action on category 2 hazards.

Damp and mould are critical indicators of **poor housing conditions**, with far reaching consequences for both property integrity and human health . These issues compromise the structural soundness of buildings by causing rot, decay and long term damage to walls, ceilings and fixtures,. At the same time, damp and mould pose significant health risks - exacerbating respiratory illnesses, triggering allergies, and causing mental health issues like anxiety and depression. This could be due to worries about the health impacts of damp and mould, the stress of living in unpleasant living conditions and the loss or damage of personal belongings.. This combination of structural deterioration, health hazards, and emotional distress , creates an unsafe and unhealthy living environment.

Everyone is vulnerable to the health impacts of damp and mould, but people with certain health conditions, children and older adults are at greater risk of more severe health impacts. In 2022, the media reported widely on poor conditions caused by damp and mould in social and private rented housing. This was primarily prompted by highlighting the tragic case of two-year-old Awaab Ishak who died in 2020 due to prolonged exposure to mould in his home.

Certain groups are more likely than others to live in homes with damp and mould[10]. This includes:

- people with a long-term illness
- people who struggle to heat their homes and/or are experiencing fuel poverty
- people on low incomes
- people with disabilities
- people from ethnic minority backgrounds
- people living in temporary accommodation.

6.5 Overcrowding

Overcrowding is a secondary impact of housing unaffordability. A household is classified as overcrowded if it has fewer bedrooms than it needs to avoid undesirable sharing, based on the age, sex and relationship of household members. 13.6% of privately rented households within Havering are overcrowded. This is slightly lower than the London average of 15%[11] but higher than the average for England of 8.5%[12] (Figure 8).

Overcrowding contributes to poor housing by increasing wear and tear on properties, elevating the risk of disease transmission due to close contact, making it harder to maintain hygiene and control pests, and exacerbates hazards such as damp and mould due to the increased laundry and cooking activities required to cater to more people in a confined space. This strain can lead to

[10] Understanding and addressing the health risks of damp and mould in the home _ GOV.UK (www.gov.uk)
[11] Census 2021
[12] Overcrowding and under-occupancy by household characteristics, England and Wales - Office for National Statistics

more frequent and more severe problems in the building's structure and systems: insulation and ventilation cannot generally cope with the extra demand. The HHSRS states that 'crowded conditions can result in a moisture burden above that which the dwelling is designed to safely deal with, and this can be a cause of condensation and high humidities, giving rise to associated health risk'[13]. Ultimately this worsens the overall living conditions for the residents.

Evidence indicates that **poor housing conditions** and overcrowding negatively affect physical and mental health and can also have a major impact on educational achievement. For example, children's education may be affected by overcrowding directly, through a lack of space for homework, as well as indirectly because of school absences caused by illness[14].

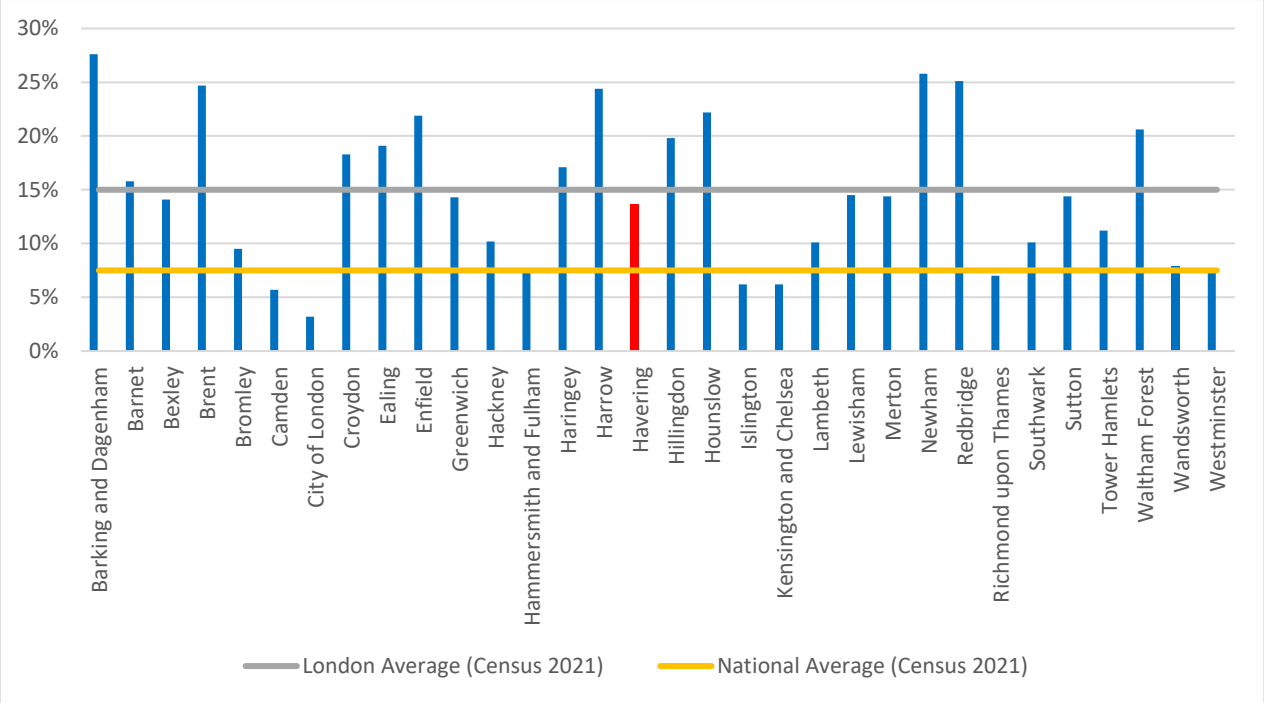


Figure 8. Percentage of overcrowded PRS properties by London borough (Census 2021)

6.6 Fuel Poverty

Whilst energy prices in the UK are no longer near the extreme highs seen in late 2022 and early 2023, energy prices remain high and unaffordable for many. With growing pressure on household finances because of increasing energy costs and wider concerns about the cost of living, there are reports that households are choosing between "heating or eating" over the winter months.

Fuel poverty worsens **poor housing conditions** by forcing people into homes that are not energy efficient and where they cannot afford adequate heating. This leads to cold, damp, and poorly maintained properties, increasing health issues like asthma and making homes colder and more costly to run. The cycle of fuel poverty is driven by low household income, high energy costs, and poor energy efficiency, creating a mutually destructive relationship between occupants and their living space.

[13] HHSRS Guidance
[14] The impact of bad housing on children's lives (Shelter)

6.7 Minimum Energy Efficiency Standard (MEES)

An EPC rating is an assessment of a property's energy efficiency. It is primarily used by buyers or renters of residential properties to assess the energy costs associated with heating a house or flat. The rating is from A to G. A indicates a highly efficient property; G indicates low efficiency.

The Minimum Energy Efficiency Standard (MEES) came into force in England and Wales on 1 April 2018. The regulation applies to PRS properties and mandates that all dwellings must have an EPC rating of A-E to be compliant. Currently in Havering 13.9% of PRS properties have an E to G rating with 1.2% having an F and G rating[15].The statistical evidence shows that there is a continuous relationship between indoor temperature and vulnerability to cold-related deaths[16]. The colder the dwelling, the greater the risk. The percentage rise in deaths in winter is greater in dwellings with low energy efficiency ratings. Therefore, the F and G properties present a serious risk to the occupants' health, particularly if over the age of 65.

Not only does poor energy efficiently contribute to poor housing conditions by causing low indoor temperatures, the mismanagement or implementation of efficiency measures can lead to problems like poor indoor air quality and damp and mould growth. Specifically, efforts to improve energy efficiency by reducing ventilation without adequate mechanical systems can trap moisture and pollutants, causing health hazards and structural issues. Additionally, if energy efficiency measures are not coupled with affordable energy and sufficient heating, it can lead to fuel poverty and cold, unhealthy living conditions.

6.8 Age and type of properties

As described at section 4.2 above, a high proportion of properties in Havering were built pre-Second World War (43%) and as such are at a greater risk of being in disrepair and having both category 1 and 2 hazards.

6.9 Levels of housing complaints and service requests in the designated wards

Whilst the Housing Stock and Stressors report is an estimate of the number of housing hazards that are likely to be present in these wards, the number of actual housing complaints and the resulting statutory notices are additional evidence of the level of severe issues in the designation. Complaints and service requests made by PRS tenants to the council about poor property conditions and inadequate property management are a direct indicator of low quality PRS. Havering received 1,219 complaints and service requests from PRS tenants(excluding HMO tenants) in these seven wards over the period 2021-2024.. Rush Green & Crowlands (148) and St Alban's (134 had the highest number of complaints and service requests (Figure 9).

[15] Housing Stock Condition and Stressors Report (Metastreet 2024)
[16] Housing Health and Safety Rating System

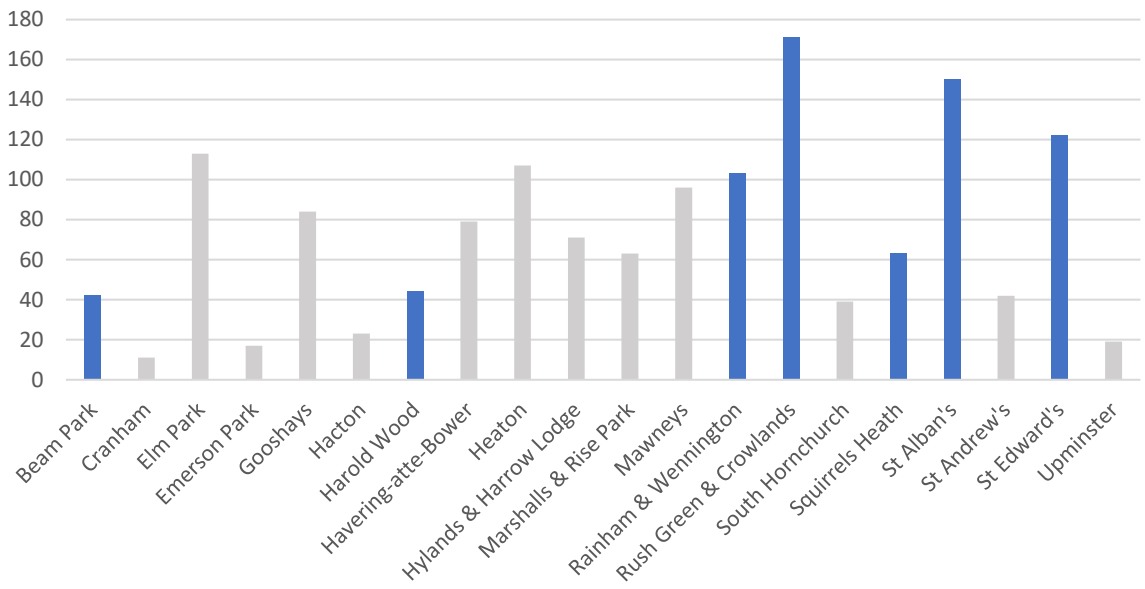


Figure 9. Complaints linked to PRS properties (Excl. HMOs) by ward (Source Metastreet 2024)

6.10 Public perception of poor housing conditions

During the consultation on selective licensing, Havering Council asked respondents for their views on problems related to the borough as a whole and within the private rented sector.

Respondents were asked to what extent they believed that poor property conditions were a problem in the borough. 31%, stated that they thought that poor property conditions were a very big or a fairly big problem, 42% thought poor property conditions were not a very big problem and 28% thought they were not a problem at all (Figure 10).

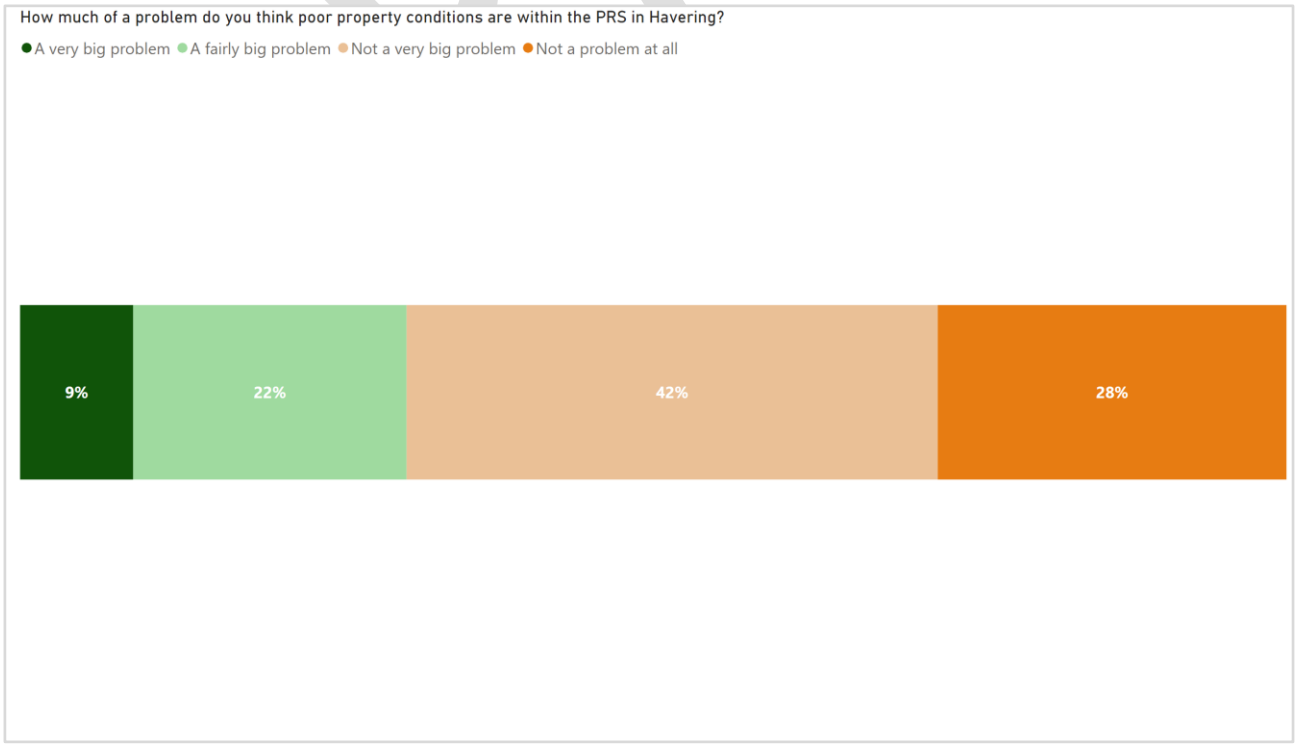


Figure 10: Respondents views on poor property conditions in Havering

Looking at responses by stakeholder group, there is disparity between the views of landlords, letting and managing agents and those of residents or businesses and other stakeholders; where 93% of landlords, letting and managing agents viewed poor property conditions as not a very big problem or not a problem at all, only 53 per cent of residents or local businesses concurred. However, 66 per cent of other stakeholders held the opposing perspective and viewed poor property conditions as a fairly big or very big problem. (Figure 11).

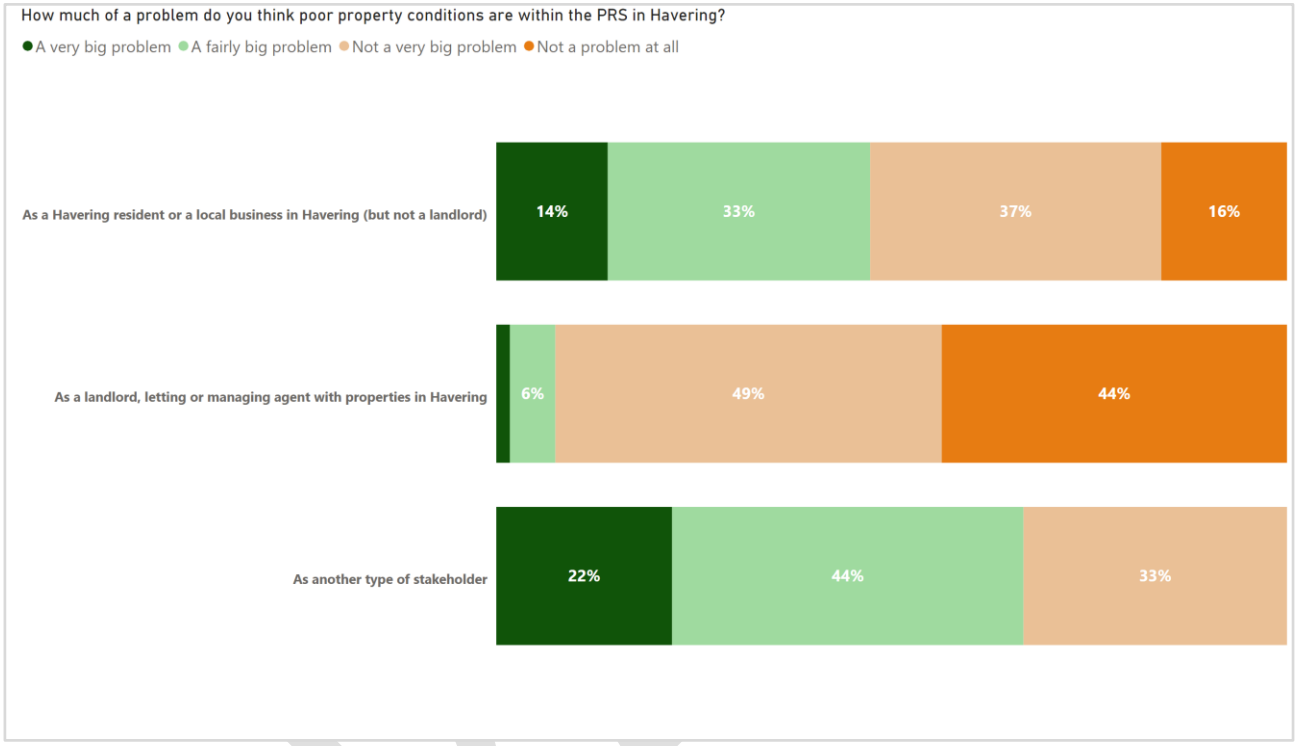


Figure 11: Respondents views on poor property conditions in Havering by stakeholder type

Respondents were also asked their views on issues related particularly to the private rented sector. Respondents were asked to what extent they believed that the physical condition of private rented properties were a problem in the borough. 39% of respondents either agreed or strongly agreed, while 34% of respondents disagreed or strongly disagreed (Figure 12).

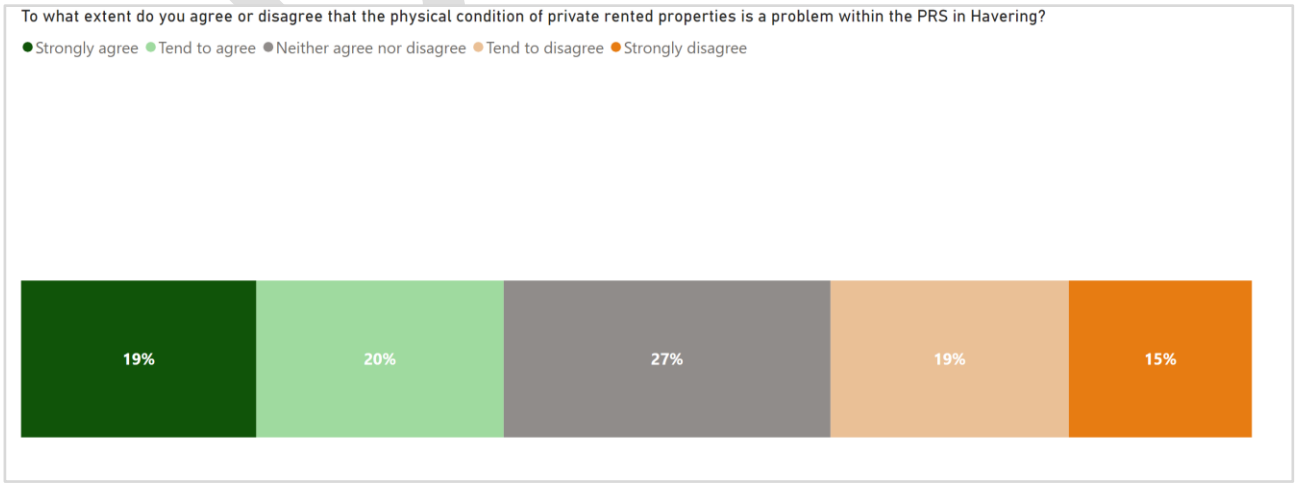


Figure 12: Respondents views on the physical condition of PRS in Havering

When looking at the respondent type, of respondents who were either residents or businesses 65% either agreed or strongly agreed that the physical condition of private rented properties is a problem in Havering. In contrast only 4% of landlords or agents agreed or strongly agreed that the physical condition of private rented properties is a problem in Havering. 66% of all other stakeholders thought it was a very big or fairly big problem (Figure 13).

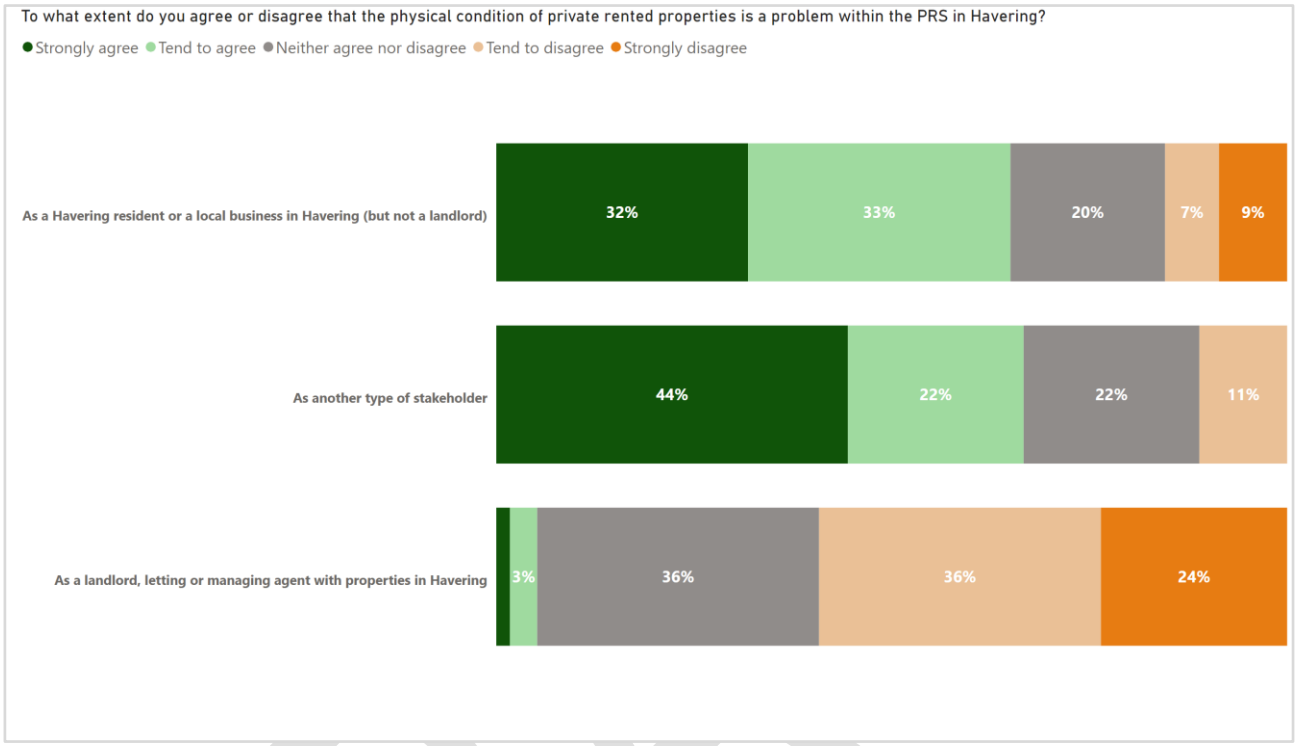


Figure 13: Views on physical conditions of PRS properties being a problem in Havering by respondent type

Respondents were asked to what extent they agreed that poorly maintained properties were contributing to the decline in some areas in Havering. 49% of respondents either agreed or strongly agreed, while 33% of respondents disagreed or strongly disagreed (Figure 14).

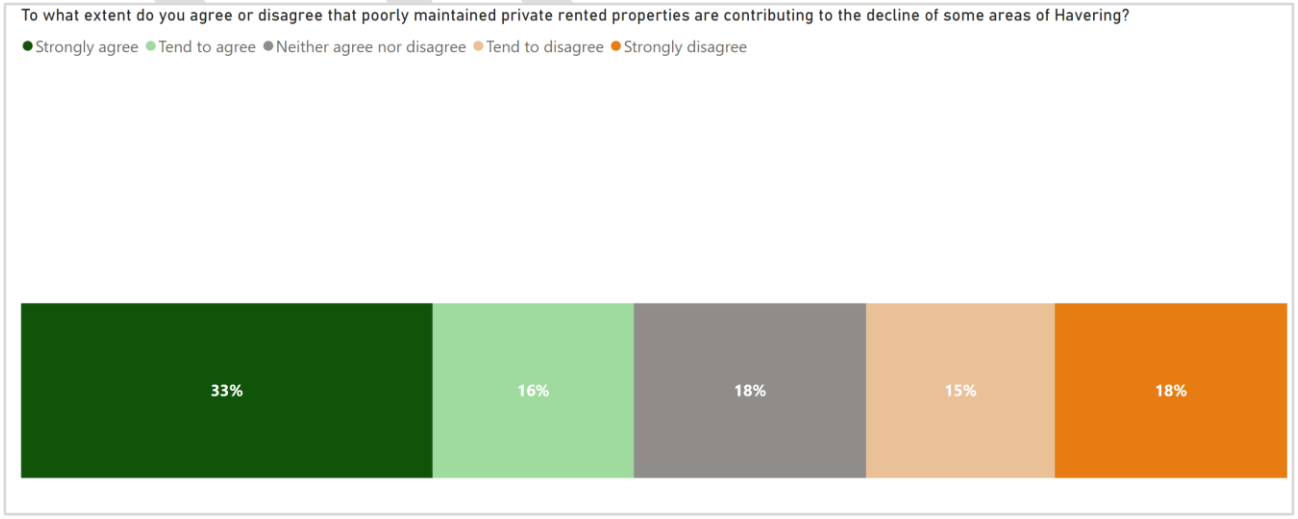


Figure 14: Views on poorly maintained PRS properties in Havering

When looking at the respondent type, of respondents who were either residents or businesses, 75% either agreed or strongly agreed that poorly maintained properties were negatively impacting some areas in Havering. In contrast only 14% of landlords or agents agreed or strongly agreed that the physical condition of private rented properties is a problem in Havering. For the group that encompassed all other stakeholders, 66% thought it was a very big or fairly big problem (Figure 15).



Figure 15: Respondents views on property maintenance in the PRS

When asked whether poorly managed private rented properties were negatively impacting some areas in Havering, 49% either agreed or strongly agreed (Figure 16).

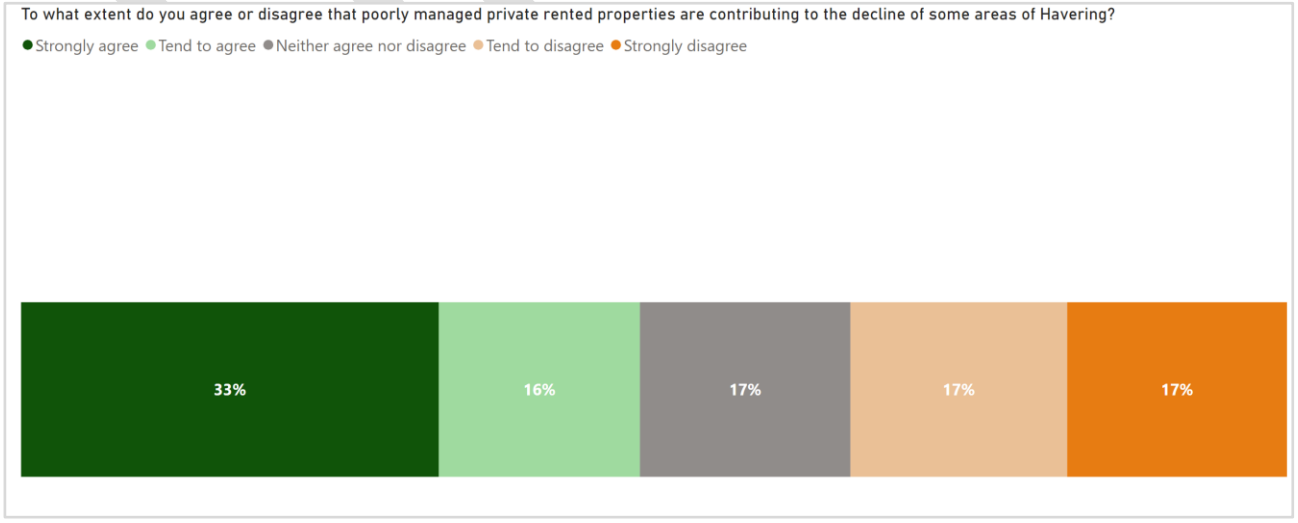


Figure 16: Respondents views on poorly managed PRS properties in Havering

When looking at the respondent type, of respondents who were either residents or businesses, 76% either agreed or strongly agreed that poorly managed properties were negatively impacting some areas in Havering. In contrast only 14% of landlords or agents agreed or strongly agreed that the poor management of private rented properties is a problem in Havering 55% of the other stakeholders who were neither residents or businesses nor landlords, letting or managing agents with properties in Havering, thought it was a very big or fairly big problem (Figure 17).

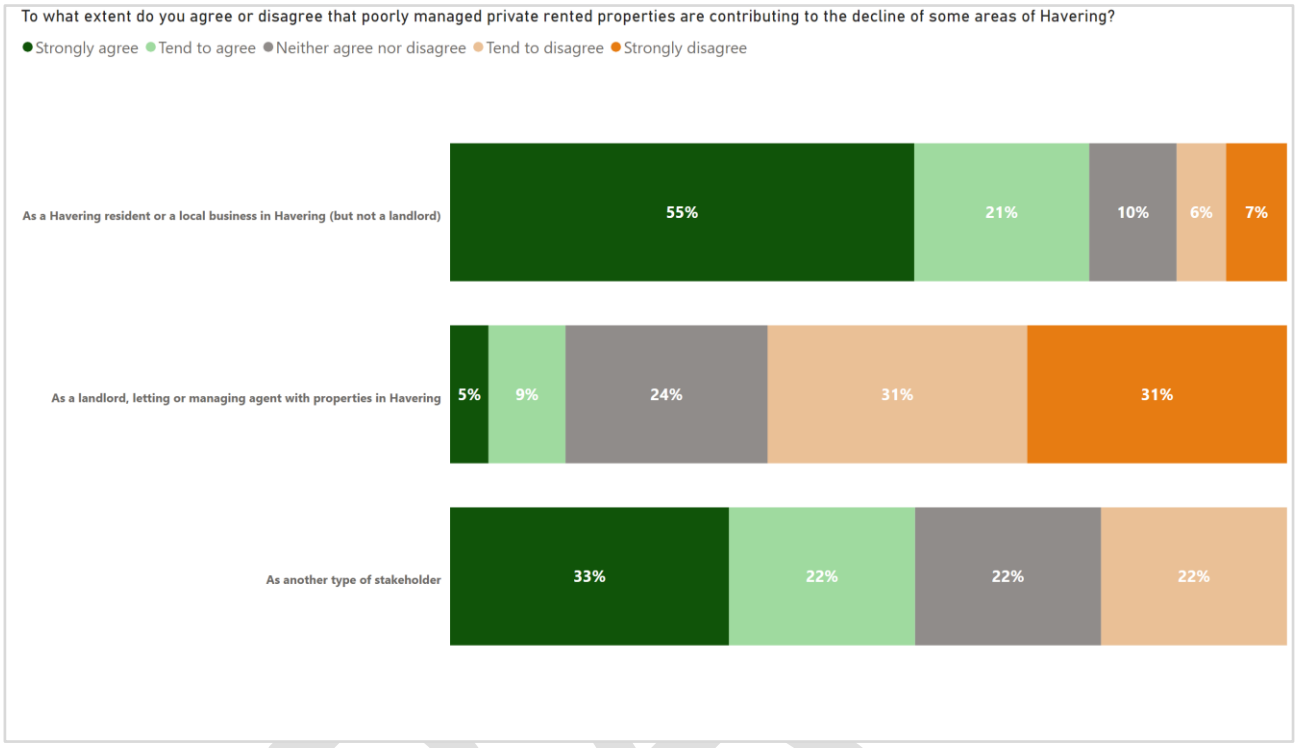


Figure 17: Respondents views on the management of PRS properties

The consultation results indicate a consensus among respondents that there are significant issues with private rented properties in the borough, including poor physical condition, inadequate maintenance and poor management. The results also highlight the difference between landlord's perception of property conditions and the management of private rented homes and the lived experience of all other stakeholders. It is likely that this stems from their differing perspectives on licensing schemes. Tenants see licensing schemes as beneficial, providing an added layer of protection that can lead to improved living conditions, while landlords often perceive them as an extra regulatory burden. Despite these opposing views, the licensing scheme aims to balance the interests of both tenants and landlords. The scheme seeks to protect tenants from substandard living conditions while also providing clear guidelines for landlords to follow in managing their properties.

6.11 Inspections to be carried out with a view to carrying out any necessary enforcement

The review of housing conditions under section 3(1) of the Act, identified a significant number of properties in the PRS that need to be inspected with a view to determining whether any category 1 or 2 hazards exist on the premises and taking any necessary enforcement action for remediation. Within the designated area, it is predicted that 2,192 private rented properties (excluding HMOs) have at least one serious hazard.

The designation of these wards will allow Havering Council to deal with some of the worst property conditions in the borough at scale. The Private Sector Housing team would have targets to inspect, intervene and improve sub-standard dwellings.

It is the Councils intention to risk assess all applications. Higher risk properties will be prioritised for inspection by officers to check for hazards and compliance with licence conditions. The Council will take the full range of necessary enforcement actions, including the additional regulatory controls afforded by property licensing, to improve poor property conditions.

The objectives for the scheme state that the Council will improve housing conditions in the PRS and improve management standards in PRS properties. All private rented property licence applications will receive a desk-based risk assessment. Compliance inspections will be undertaken in at least 70% of selectively licensed properties and 100% of HMO properties over the five-year life of the scheme. It is anticipated that this will lead to at least 70% of properties being improved via compliance inspections alone and subsequent enforcement action where required.

It is also the Council's intention to inspect all properties when a complaint of poor conditions and disrepair is received and to take any necessary enforcement action to remediate any hazards identified. Through this inspection regime the Council will ensure that any Category 1 and 2 hazards identified are remediated and licence conditions complied with. This will achieve a general improvement of property conditions in the designated area within the lifetime of the designation. See case study 1 below.

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Case study 1: Unlicensed property brought into compliance

Background

The Private Sector Housing Team received a complaint from a tenant regarding significant disrepair in their rented property. The tenant described a persistent leak from the first-floor bathroom, causing water damage to the kitchen below, including damp, mould, and water seeping through the light fixture. Despite repeated attempts to inform the landlord and request repairs, no action was taken. Council officers' initial investigations revealed the property, located in a selective licensing area, was unlicensed, with no application submitted.



Hazards identified

On inspection, the property was found to have several hazards identified under the Housing Health and Safety Rating System (HHSRS), including a category 1 hazard of damp and mould and category 2 hazards of electrical safety, structural collapse and falling elements, flames and hot surfaces, and food safety.



Council action

The Council served a Housing Act 2004 improvement notice and comprehensive schedule of works requiring the landlord to address the category 1 and 2 hazards. A licence application was pursued and the Council considered a range of additional enforcement actions in relation to the licensing non-compliance.

Outcome

The landlord complied with the notice which led to significant improvements in the property, bringing it up to the required standard. A selective licence application was also received.

The proposed selective licensing scheme would continue to ensure that action is taken against those landlords who choose to neglect their tenants and properties. We shall robustly enforce against any landlords who fail to obtain a licence, who deliberately fail to comply with licensing conditions, or whose properties present serious housing hazards.

6.12 How the Council will use selective licensing to improve general housing conditions in the area

The confirmation of the scheme will allow the Council to have a robust enforcement framework and will enable the Council to provide the enforcement capability necessary to achieve the scheme objectives, improving general housing conditions in the area. The selective licensing scheme will form part of a wider strategy for the Council in improving the PRS in the area and ensuring that safe and decent housing is accessible to people on a range of incomes in a market that is well regulated and offers appropriate protection to tenants. The scheme would form part of a coordinated approach in connection with dealing with homelessness, empty properties, regeneration and anti-social behaviour associated with privately renting tenants.

The legal framework of the licensing scheme enables property issues to be dealt with more effectively:

- The licence application process requires the management arrangements for each licensable home to be confirmed, a nominated Licence Holder to be identified and for key parties involved in the letting/management of the licensed property to pass a 'fit and proper person' test.

- A granted licence is accompanied by a set of conditions which place obligations on the Licence Holder (or another nominated party) in relation to the management, use or occupation. These conditions, for example, currently include requirements to carry out 6-monthly inspections of the rented home to identify any problems relating to its condition and management and to take prompt action to investigate complaints relating to disrepair or pest infestation.

- The Council's Private Sector Housing Team receives approximately 580 service requests each year, many of which relate to reported poor housing conditions in privately rented homes. In most cases the rented home is licensed, and through licensing, the Council has a 'go to' party in the form of the nominated Licence Holder to which most complaints are immediately referred to as part of a triage process.

- Licensing data also enables the ready identification of interested parties should it be necessary to take formal enforcement action although, in most cases, the effective operation of the licensing regime means that property-related defects are remedied informally. In this regard, whilst the Council recognises that there are limitations on what a landlord can be required to do as a condition of a selective licence, it is the case that the evidenced failure of a landlord/Licence Holder to maintain their rented property such that formal action (such as the service of a Notice under Part 1 of the Housing Act – HHSRS) is needed will adversely impact on their ability to be regarded as a fit and proper person able to hold a licence or a full term licence.

The Council will work with, advise and support landlords to address poor property conditions, and achieve compliance with the licence conditions. This will be done through a combined effort as a local authority working in partnership with external partners such as the London Fire Brigade, Justice for Tenants, Safer Renting, the Citizen's Advice Bureau and the Police as well as other Council departments, to identify properties that need improvement.

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Poor property conditions can exacerbate factors that make deprivation worse. The licensing inspection regime will enable the Council to identify tenants on low incomes who are living in homes with an E, F or G EPC rating and those who may be affected by fuel poverty. Tenants will be referred to the appropriate services to ensure they receive the available support, and landlords will be advised accordingly. For those whose properties fall below the legal requirement and who ignore the advice and support of the Council, the Private Sector Housing team will work with Trading Standards (currently responsible for enforcement of The Domestic Minimum Energy Efficiency Standard (MEES) Regulations) to bring them into compliance.

As outlined in section 6.5 above, overcrowding is another element that makes poor property conditions worse. Selective licensing not only helps the council to identify properties at risk of becoming overcrowded, but sets maximum household occupancy rates, where the property would not be suitable for occupation by multiple households. Where Havering Council find properties are overcrowded, they will work with landlords to reduce occupancy to safe levels, referring tenants to the Council's Housing Solutions Service, or to Citizens Advice for further guidance on their legal rights, their eligibility for housing support and around how to find alternative accommodation, where appropriate.

Communicating the availability of advice and support to landlords is paramount, and the Council has committed to holding two landlord forums per year to update all licensed landlords on changes in legislation, Council policy and other general information and guidance.

The council recognise that having accredited landlords is also key to raising standards in the private rented sector and have actively encouraged all landlords to become accredited to achieve a level of housing knowledge and competence before letting a home. The Council will continue to work with the London Landlord Accreditation Scheme (LLAS) to provide training for landlords. As of 2025, Havering had 1,165 landlords accredited to LLAS, and the Council is expecting to see this number rise following the introduction of a selective licensing scheme.

Where needed and when landlords do not comply with the Council's licensing conditions, fail to license or whose properties present serious housing hazards, the Council will intervene and improve a significant number of these properties, and ensure compliance with licence conditions in properties through a combination of informal and formal enforcement action.
A key objective of the scheme is to increase awareness in tenants on the minimum standards to be expected in rented accommodation. The Council will deliver an education campaign to make renters aware of licensing, tenancy rights and responsibilities and services available. By educating tenants on how to deal with issues that arise in their properties this will also lead to general improvements in the PRS. See case study 2.

Licence conditions:
The conditions that the Council proposes to include in licences granted under the selective licensing scheme are listed in Appendix 4. These will be used to improve the management of properties, support the proactive maintenance of properties, ensure compliance with property standards, and prevent a further deterioration in rented properties in the area.

All licences will contain the mandatory licence conditions in accordance with the Housing Act 2004, Schedule 4. In addition to the mandatory conditions, the Council will include discretionary licence conditions related to the standard and management of properties. Examples of these discretionary conditions include the following:

Condition 9.1

(The Licence Holder must ensure) that prompt action is taken to investigate and effectively address reports of disrepair or pest infestation at the house. The Licence Holder must ensure, in particular, that a written response is made to any such report within 21 days of receipt, stating the action that has been or will be taken.

Condition 9.14

Ensure that the exterior of the house is kept clean and tidy and that issues of routine maintenance affecting the exterior, such as broken windows, are addressed promptly.

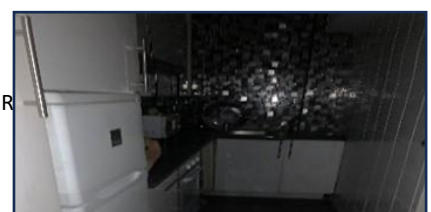
Condition 12.5

Ensure that inspections of the house are carried out at least every six months to identify any problems relating to the condition and management of the house. The Authority may increase the frequency of such inspections if it has good reason to be concerned about the condition or management of the house. The records of such inspections shall be kept for the duration of this licence. As a minimum requirement the records must contain a log of who carried out the inspection, date and time of inspection and issues found, and action(s) taken. Copies of these must be provided to the Authority within 21 days on demand.

The Council will use selective licensing, including specific licence conditions imposed under Section 90 of the Act, to bring about an improvement in general housing conditions in the area using a combination of informal and formal actions, including the service of statutory housing and public health notices, civil penalties and prosecutions for the worst and most severe cases, alongside other Council strategies.

Making this designation will, when combined with other measures taken in the area, such as working as a multidisciplinary team alongside internal and external stakeholders including the London Fire Brigade, Home Office, Police, HMRC, Justice for Tenants, Planning Enforcement, Community Safety, Social Services, Housing Needs and Council Tax, will allow the Council to identify areas and properties of concern and continue to improve property conditions in the designated area within the lifetime of the scheme and to prevent further deterioration in the area.

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Case study 2: Collaborating with partners to protect the safety and wellbeing of tenants in the PRS

Background

A healthcare professional, following a visit to a tenant, raised concerns about significant disrepair in the tenant's private rented property. The tenant was reluctant to pursue the matter himself due to fears of eviction. Back-office checks confirmed that the property was licensed. Council officers were able to make immediate contact with the licence holder to arrange an inspection of the property.



Hazards identified

On inspection, the property was found to have serious disrepair including a leak from the bathroom to the kitchen, security concerns with the ground-floor windows and rear doors, a trip hazard in the kitchen, a slug infestation, a faulty electrical socket, and potential structural problems with the flank wall.



Council action

A post-inspection letter was sent to the landlord, setting out the issues within the property. The landlord responded promptly, indicating their commitment to addressing the concerns. Remedial works were initiated immediately to rectify the disrepair and ensure the property met all necessary safety standards.



Outcome

Remedial works were completed within the specified timelines. The tenant now has the benefit of replacement windows throughout, a new rear door, new fitted kitchen. The flank wall issue was highlighted on a structural engineer's report to be not significant but works recommended were complied with.

Licensing enables the Council to work with, advise and support landlords to address poor housing conditions and achieve compliance with licence conditions. Additionally, licensing plays a crucial role in educating tenants about their rights and how to deal with issues that arise in their properties. We will continue to collaborate with partners to help protect the safety and wellbeing of tenants in the PRS

7. Proposals for an additional HMO licensing scheme

7.1 Proposed scheme designation area

The evidence base demonstrates that the criteria for a borough-wide additional licensing scheme is met in that a significant proportion of the borough's HMOs are being poorly managed and are giving rise, or are likely to give rise, to problems affecting their occupiers or members of the public.

Evidence shows that a significant proportion of HMOs in the borough are being managed ineffectively, proven by the cumulative presence of serious housings hazards.

An additional HMO licensing scheme is proposed that will apply to all wards in the borough. Subject to approval, the scheme will come into force in 2026 and last for a period up to five years.

An additional HMO licence will be required for properties that are HMOs rented to three or four occupiers in two or more households that share (or lack) toilet, washing and cooking facilities. This excludes HMOs that require a mandatory HMO licence. Multiple-occupied flats in purpose-built blocks (with over two flats) where more than three people live in the flat are included.

The proposed additional HMO scheme will also apply to converted building HMOs, known as section 257 HMOs. These are properties:

- That have been converted into self-contained flats
- Where the conversion did not comply with the relevant Building Regulations in force at that time and still does not comply; and
- Where less than two thirds of the flats are owner occupied.

There are some types of buildings which are exempt from HMO licensing by law. These include buildings controlled by public sector bodies (for example, housing associations), some buildings occupied by students, and some owner-occupied buildings. A full list of exemptions can be found at Housing Act 2004 (legislation.gov.uk).

7.2 Evidence to support the Council's proposals to implement an additional HMO scheme?

During analysis in preparation for this proposal, HMOs in Havering were divided into two main groups, ***known*** HMOs (licensed by the authority under Part 2, Housing Act 2004,) and ***predicted*** HMOs (shared amenity HMOs with 3 or more occupants).
The known HMO group meet the following standards:

- Dwellings inhabited by either three (Additional) or five (Mandatory) or more occupiers, residing in two or more distinct households, and sharing common amenities like a kitchen or bathroom. This regulation applies irrespective of the number of floors.

The predicted HMO group are based on the following standard:

- Dwellings inhabited by three or more occupiers, residing in two or more distinct households, and sharing common amenities like a kitchen or bathroom. The property type is not considered.

Havering 's HMO population is made up of known HMOs that share basic amenities (410) and predicted HMOs (454). The total HMO population in Havering is therefore calculated to be 864.

The HMO population is distributed across all wards. Rush Green & Crowlands (89) has the most HMOs (Figure 18 and Figure 19).

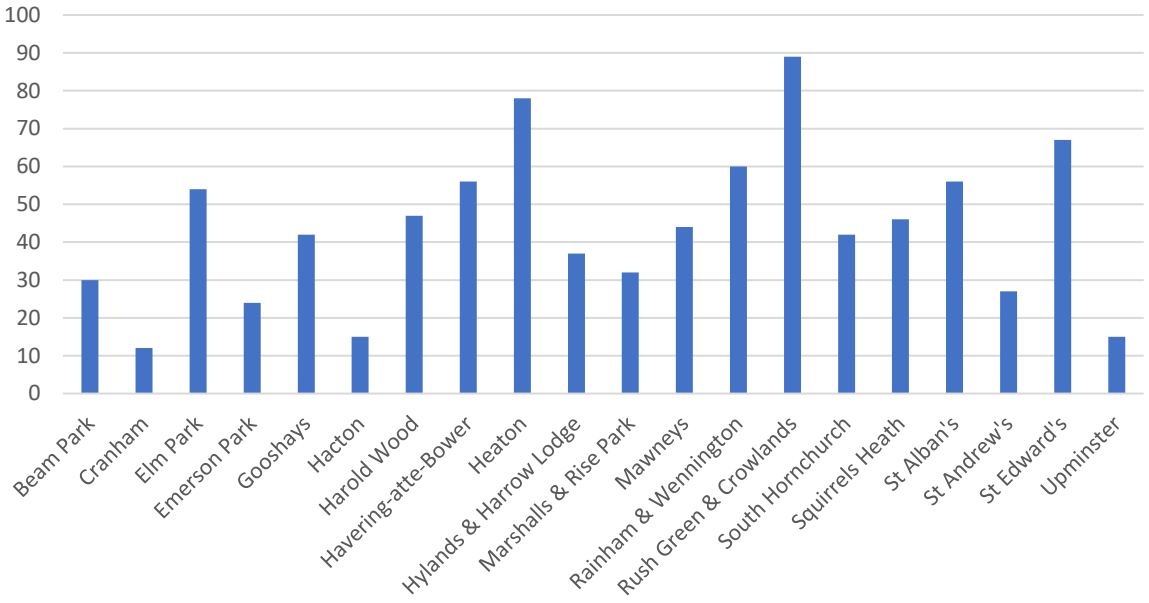


Figure 18. Number of HMOs by ward (known and predicted) (Source Ti 2024)

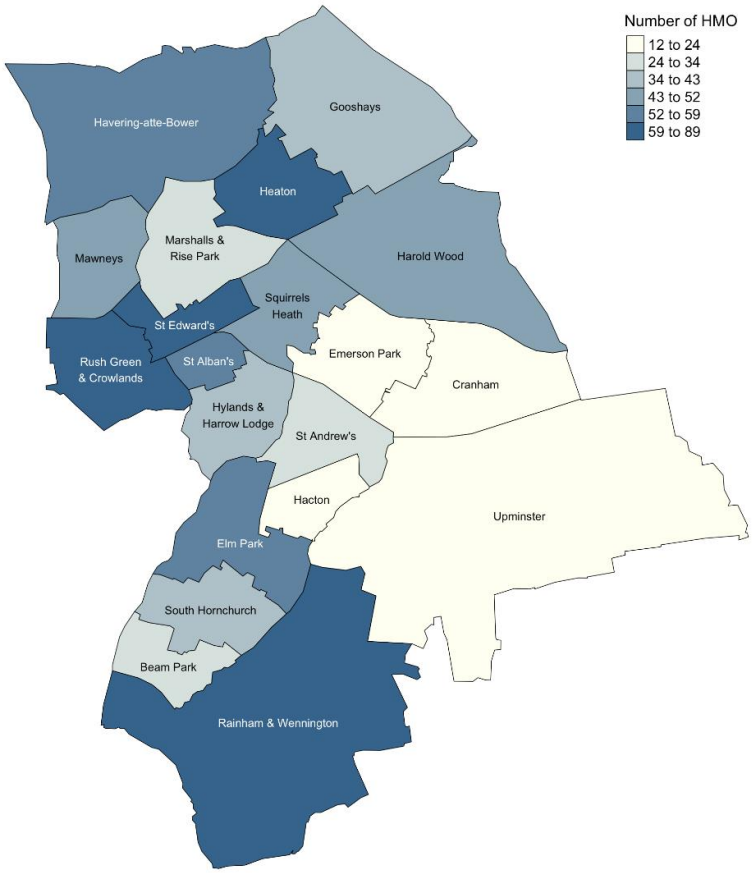


Figure 19: Distribution of shared HMOs (known and predicted) (Source Ti 2024, map by Metastreet)

To introduce an additional licensing scheme, the local authority must consider that a significant proportion of the HMOs in the area are being managed ineffectively, giving rise to, or likely to give rise to, one or more particular problems, either for those occupying the HMOs or for members of the public.

The evidence base demonstrates that the criteria for a borough-wide additional licensing scheme is met in that a significant proportion of the borough's HMOs are being poorly managed and are giving rise, or are likely to give rise, to problems affecting their occupiers or members of the public.

Poor housing conditions are prevalent in Havering's HMOs. The evidence shows that 426 HMOs in Havering are predicted to have serious hazards (Category 1 and high-scoring Category 2). This represents nearly 50% of all HMOs in Havering and is more than quadruple the national average of 10%.17 (Figure 20)

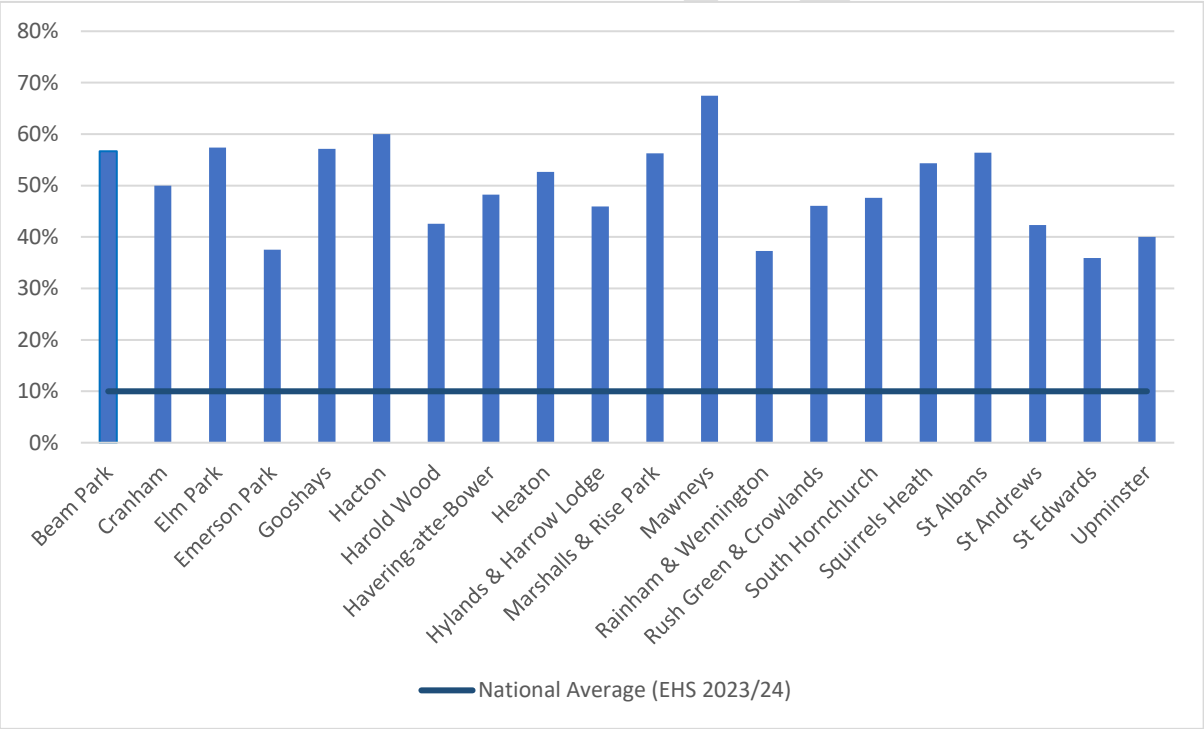


Figure 20. Predicted percentage of HMOs with serious hazards by ward (HSCR 2024)

Between 2021-2024 Council officers identified 1254 hazards (Category 1 & 2, HHSRS) during inspections of known HMOs. Therefore 43% of HMOs inspected were found to have at least 1 hazard (Category 1 & 2, HHSRS). Council officers identified the most hazards in HMOs in Heaton (257) and Havering-atte-Bower (115). (Figure 21)

[17] English Housing Survey 2023 to 2024: headline findings on demographics and household resilience. - GOV.UK

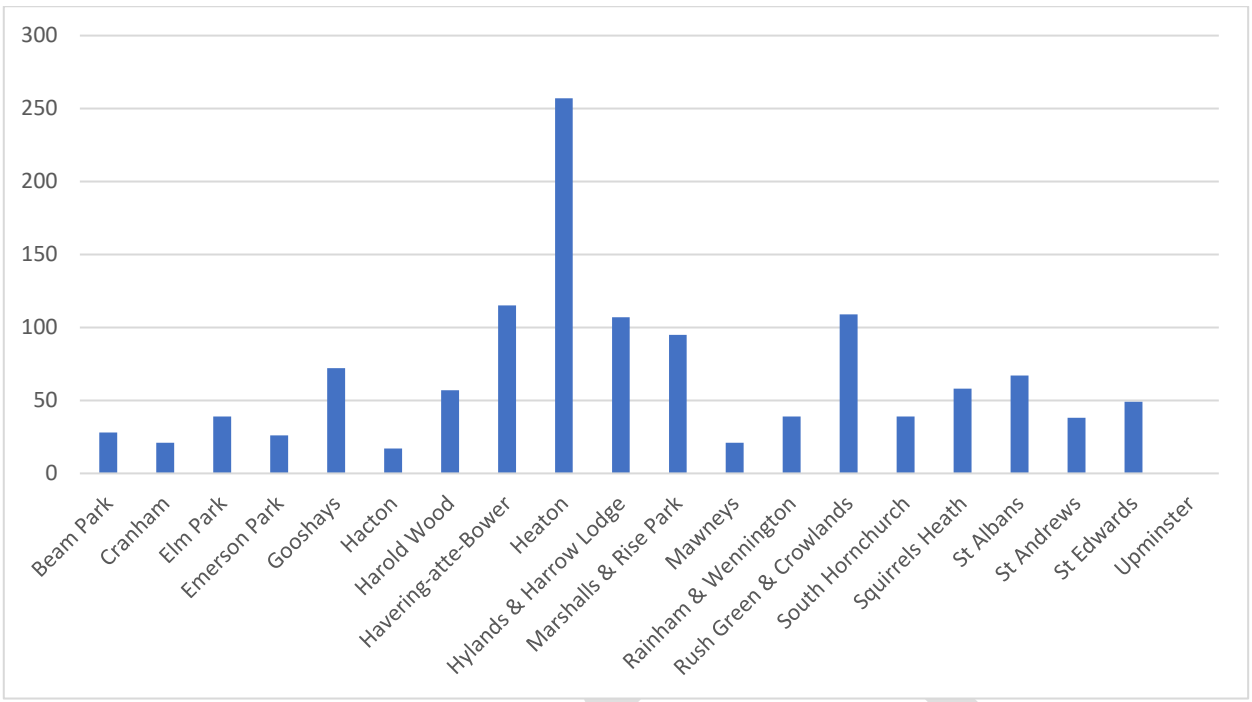


Figure 21. All hazards identified through inspections of HMOs by ward (HSCR 2024)

Complaints made by tenants and others to Havering Council about poor housing conditions and inadequate property management are a direct indicator of low quality and poorly managed HMOs. Between 2021- 2024, Havering received 240 complaints linked to HMOs distributed across all wards with Elm Park (29) and Mawneys (28) having the highest levels.(Figure 22)

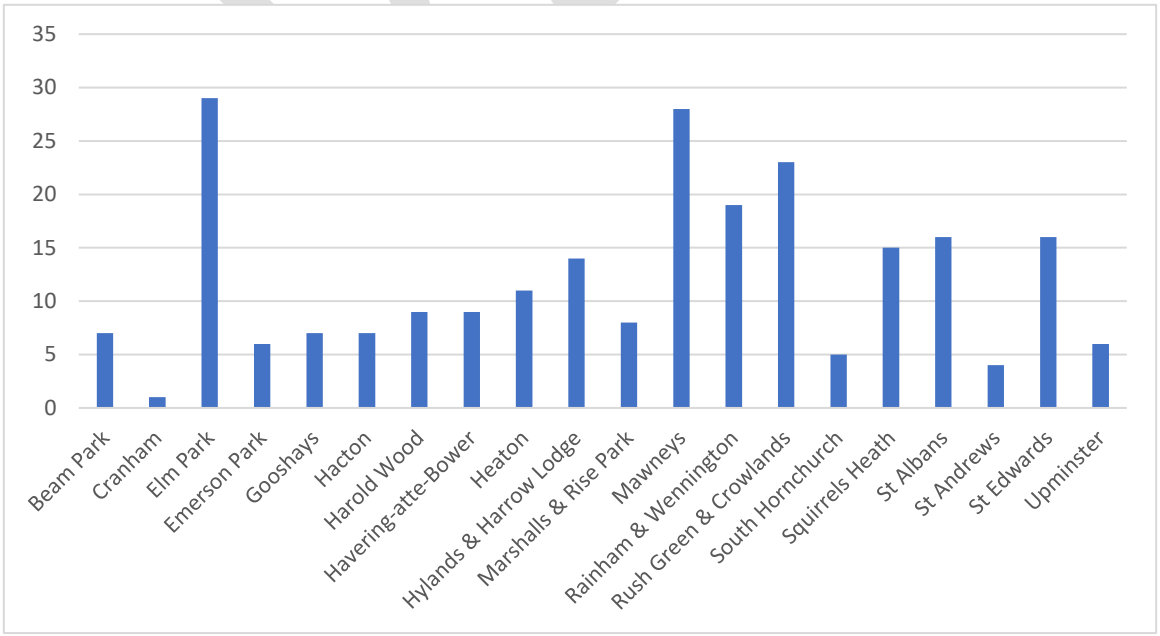


Figure 22: Complaints linked to HMOs by ward (HSCR 2024)

Responding to complaints in HMOs has required a significant number of Council interventions, representing a drain on Council resources. Between 2019-2024, the Council has issued HMOs with 167 housing and statutory housing and public health notices. St Albans (18) and Rush Green & Crowlands (16) required the most statutory notices on HMOs.(Figure 23)

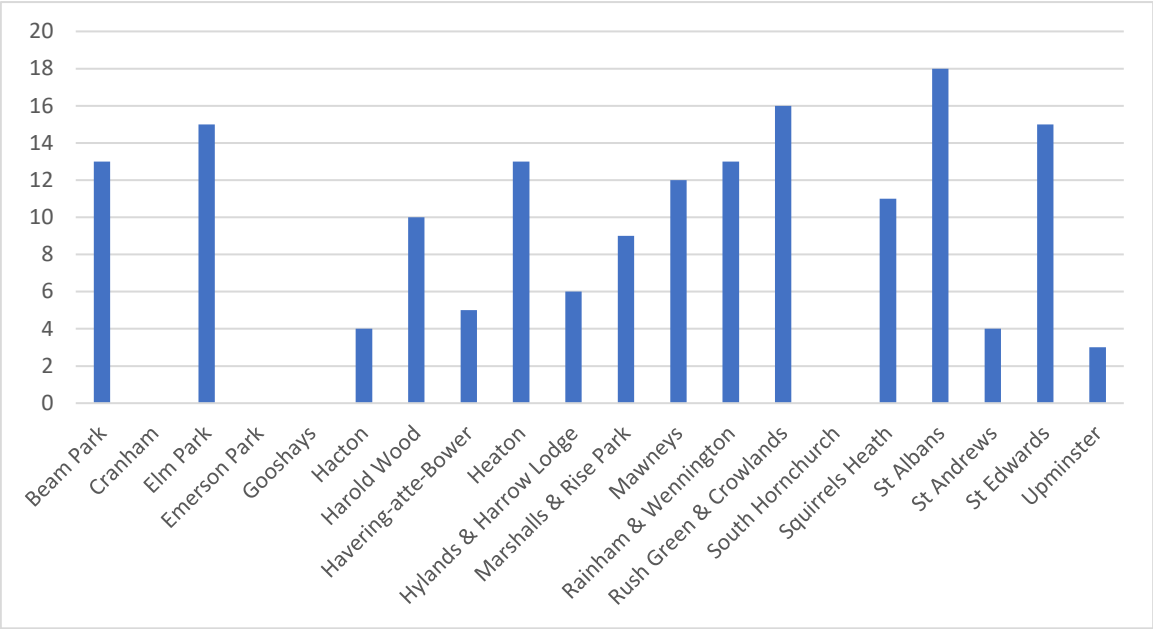


Figure 23. HMO statutory housing and public health notices served by ward (HSCR 2024)

7.3 Public perception on additional licensing scheme outcomes proposals

During the consultation on additional licensing, Havering Council asked respondents for their views on whether they thought an additional HMO licensing scheme in Havering would help to achieve the certain outcomes:

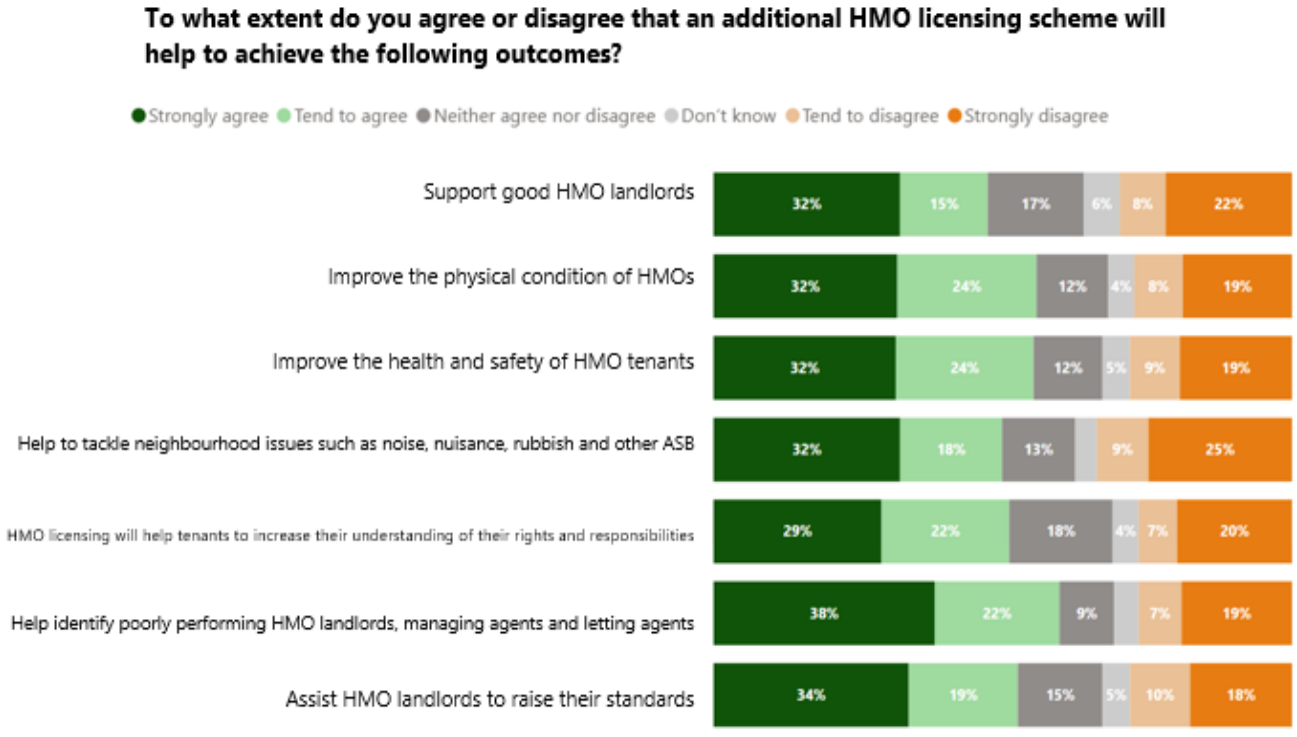


Figure 24: Respondents views on additional licensing scheme outcomes

Support good HMO landlords

A majority of respondents, **47** per cent, either agreed or strongly agreed, while **30** per cent either disagreed or strongly disagreed. **23** per cent said they neither agreed nor disagreed or didn't know.

Improve the physical condition of HMOs

The majority of respondents, **56** per cent, either agreed or strongly agreed, while **27** per cent either disagreed or strongly disagreed. Almost **17** per cent said they neither agreed nor disagreed or didn't know.

Improve the health and safety of HMO tenants

The majority of respondents, **56** per cent, either agreed or strongly agreed, while **28** per cent either disagreed or strongly disagreed. **17** per cent said they neither agreed nor disagreed or didn't know.

Help to tackle issues of neighbourhood problems such as noise nuisance, rubbish and other ASB

A majority of respondents, **50** per cent, either agreed or strongly agreed, while **34** per cent either disagreed or strongly disagreed. **16** per cent said they neither agreed nor disagreed or didn't know.

Help tenants to increase their understanding of their rights and responsibilities when living in an HMO

The majority of respondents, **51** per cent, either agreed or strongly agreed, while **27** per cent either disagreed or strongly disagreed. **22** per cent said they neither agreed nor disagreed or didn't know.

Help identify poorly performing HMO landlords, managing agents and letting agents

The majority of respondents, **60** per cent, either agreed or strongly agreed, while **26** per cent either disagreed or strongly disagreed. Nearly **14** per cent said they neither agreed nor disagreed or didn't know.

Assist HMO landlords to raise their standards

The majority of respondents, **53** per cent, either agreed or strongly agreed, while **28** per cent either disagreed or strongly disagreed. Nearly **20** per cent said they neither agreed nor disagreed or didn't know.

As is the case with many of the other questions, there is some polarity between the views of landlords, letting and managing agents and those of residents and local businesses and other stakeholders, However the consultation results indicate overall strong public support that the introduction of the additional HMO scheme will improve the condition, safety, and management of HMOs.

That making a designation will, when combined with other measures taken in the area by the local housing authority, or by other persons together with the local housing authority, lead to a reduction in, or the elimination of, the problem.

7.4 How the council will use additional licensing to improve poor conditions and management standards in the area

The introduction of an additional licensing scheme will strengthen the Council's ability to regulate the condition and management of HMOs within the PRS. The Council will utilise the regulatory framework, as outlined in Section 6.13, to address poor housing conditions and improve management standards across HMOs in the borough.

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This scheme will form part of a wider strategic approach to improving the PRS, ensuring that safe and decent housing is accessible to residents across a range of income levels, within a market that is well-regulated and offers appropriate protections to tenants. It will also support the Council's broader objectives in tackling homelessness, reducing the number of empty properties, and addressing anti-social behaviour associated with privately rented accommodation.

Through the additional licensing process, the Council will be able to:

- Identify and hold accountable those responsible for HMO property management;
- Enforce compliance with licence conditions;
- Take appropriate action where standards are not met.

The Council will expect property management issues identified during an inspection to be resolved within a reasonable period, depending on the severity of the issue, improvement notices, overcrowding notices and prohibition orders are formal notices that may be issued to bring about improvements in properties. Landlords who fail to license their properties could also receive a civil penalty or may be prosecuted.

In addition to enforcement, the Council will adopt a proactive approach to improving standards by supporting landlords and educating tenants. Landlords will be provided with guidance and access to resources to help them meet their legal obligations and implement best practice in property management. Tenants will be informed of their rights and responsibilities, empowering them to raise concerns and contribute to the upkeep and safety of their living environment.

All licences issued under the scheme will include the mandatory conditions set out in Schedule 4 of the Housing Act 2004. In addition, the Council will apply discretionary conditions deemed necessary to regulate the management, use, occupation, and physical condition of HMOs. The proposed discretionary conditions are detailed in Appendix 5.

The Council will employ a combination of informal and formal enforcement actions, including the service of statutory housing and public health notices, civil penalties, and prosecutions in the most serious cases. These actions will be aligned with other Council strategies to ensure a coordinated and effective response.

The designation of this scheme, alongside other measures in the area, will enable the Council to work as part of a multidisciplinary team with internal departments and external stakeholders—including the London Fire Brigade, Home Office, Police, HMRC, Justice for Tenants, Planning Enforcement, Community Safety, Social Services, Housing Needs, and Council Tax. This collaborative approach will allow the Council to identify areas and properties of concern and continue to drive improvements in housing standards and tenant outcomes across the borough.

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8. Licensing and wider council strategies

The licensing proposals are set in the context of the council's wider programmes to tackle housing need, increase sustainability, improve property standards and reduce ASB.

Licensing is part of the overall housing strategy

8.1 Havering Corporate Plan

Havering Council's Corporate Plan 2024-2027 focuses on three priorities:

- **People** - Supporting residents to stay safe and well: Aims to enhance health, support youth, and protect vulnerable groups by promoting preventive healthcare, mental health support, and improved care for at-risk children.

- **Place** - A great place to live, work and enjoy: Seeks to improve public safety, provide affordable housing, and maintain public spaces, focusing on safety initiatives and environmental sustainability.

- **Resources** - Enabling a resident-focused and resilient Council: Emphasises digital transformation, better data use, and efficient resource management, including updating systems and enhancing service transparency.

A selective licensing scheme will contribute to the Council's priorities and assist in achieving its key ambitions and deliver better standards for private renters. Licensing schemes promote healthier, safer neighbourhoods, sustainability through energy efficiency standards, and equality by ensuring safe, healthy living conditions for all residents regardless of tenure.

8.2 Havering Housing Strategy

The Council is currently developing a new Housing Strategy. The draft strategy recognises there are many housing challenges facing Havering and seeks to address these challenges in the following way:

- Set out a plan to meet the diverse and evolving housing requirements of Havering informed by the latest data and projections.
- Focus is on the provision of new homes to keep up with the rising costs and affordability challenges of PRS.

The draft Housing Strategy identifies the need to provide better standards for private renters. Eliminating poor performing private sector landlords throughout the borough remains a priority, and the Council will seek to implement new licensing measures to drive improvements into this crucial part of the borough's housing offer.

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The local authority has sought to adopt a co-ordinated approach with existing policies in connection with dealing with homelessness, empty properties, regeneration* and anti-social behaviour associated with PRS tenants, regarding both:

- ***combining licensing with other courses of action available to them, and***
- ***combining licensing with measures taken by others i.e., other organisations working in the area.***

Applicable to selective licensing scheme only

8.3 Preventing and resolving homelessness

Licensing is vital to preventing and resolving homelessness. Like many Councils, , Havering has a growing homelessness challenge and is under increasing pressure to find suitable temporary accommodation for families. There is also an inequity challenge, with a disproportionate rate of homeless families in temporary accommodation being from a Black and Multi Ethnic background[18]. In order to address the scale of the challenge surrounding homelessness the council will continue to deliver its Prevention of Homelessness and Rough Sleeping Strategy which comprehensively sets out Havering's approach, based around four objectives:
Objective 1: End long-term rough sleeping
Objective 2: Reducing the number of people in temporary accommodation
Objective 3: Supporting people who become homeless
Objective 4: Provide good value, integrated services that deliver excellent customer care.

The Council recognises the vital role of the private rented sector in providing a wider housing offer for Havering's residents. Through the implementation of private property licensing schemes, the Council will be able to ensure improved conditions and management standards in private rented housing. Licensing schemes will also enable us to offer greater protection to tenants in the private rented sector. In collaboration with partner agencies, we shall work to reduce the prospect of unlawful evictions, which in turn will help to both avoid and reduce homelessness in the borough.

Through property licensing, vulnerable residents who may be at risk of homelessness may be identified and referred to the Housing Advice Team, who will work with tenants to keep them in their current accommodation or help them find alternative housing. Tenants at risk will also be signposted to the Councils webpages which provides comprehensive guidance for those facing the threat of homelessness.

In addition, by working with landlords to improve their professionalism and understanding of their legal obligations. and by educating tenants education about their rights and responsibilities, the Council is able to support the sustainment of tenancies in the PRS and contribute to reducing homelessness in the borough.

8.4 Identifying and tackling empty properties

As part of the draft Housing Strategy, the Council have made a commitment to making better use of existing homes. The Council recognises that empty properties are a wasted resource for both the community and the owner and can cause a variety of issues such as reducing the supply of housing and attracting ASB. Bringing empty properties back into use is a priority for the Council

[18] The fight for home is a fight against racism - Shelter England

and clamping down on those landlords that keep homes empty for years on end is a key step to increasing the supply and availability of affordable homes in the borough.

Empty properties attract nuisance and ASB, so work done to bring empty properties up to standard and back into use as liveable homes is complimentary to the objectives of property licensing and other Council strategies such as homelessness and ASB reduction

8.5 Reducing Anti-Social Behaviour in the PRS

As outlined in the Havering Corporate Plan 2024 – 27, the Council are committed to working with tenants, residents and external partners to ensure that steps are taken to tackle ASB. The borough's Corporate Plan vision is one where Havering is 'A great place to live, work and enjoy' and where the Council 'Seeks to improve public safety, provide affordable housing, and maintain public spaces, focusing on safety initiatives and environmental sustainability'.

The property licensing designations are vital in supporting the Council's multi-agency approach to tackling and reducing ASB by obliging landlords and property managers to be proactive in dealing with any ASB arising in their properties

To tackle ASB problems, we have made it conditional on all private landlords who hold licences under the additional HMO or selective licensing schemes to prevent and combat ASB associated with properties they manage. Section 57(5) of the Housing Act 2004 gives a definition of ASB for the purposes of licensing under Parts 2 and 3 of the Act.

Additional and Selective Licensing will enable the Council to encourage landlords to work with their tenants to reduce ASB. Information and support will be available both online and through forums.

8.6 Supporting regeneration goals

Havering Council has developed a comprehensive regeneration strategy aimed at transforming various areas within the borough to enhance community living, infrastructure, and economic vitality. Key components of the regeneration programme include:

- building modern, energy-efficient homes and well-connected neighbourhoods that are right for our borough
- providing new, high quality Council housing and increasing the amount of family-sized homes
- providing infrastructure to support new homes
- increasing opportunities for home ownership for Havering residents
- supporting healthy communities, fit for future generations
- supporting and investing in our local economy to create a thriving place
- protecting and celebrating our history and heritage
- The Council are also committed to improving the existing housing stock in the borough.

Private property licensing schemes will act as a regulatory tool to ensure that landlords in regenerating areas maintain high property standards, supporting regeneration goals of creating more sustainable, inclusive, and well-maintained communities.

9. Licensing and other measures and initiatives

Combining licensing with other courses of action available to them

The Council will continue to use a multi-agency approach and will continue to use Part 1 of the Act, and all other public health and housing legislative powers available in conjunction with selective licensing.

9.1 Working with and supporting good landlords and agents

The Council understands the vital role that private landlords play and provide several services to support landlords in meeting their obligation to provide good quality rental accommodation for their tenants. This includes the following:

- Dedicated navigation page for private sector landlords – This provides information and advice on;
    - Applying for a landlord licence
    - Landlord accreditation scheme
    - Gas safety certificates
    - Carbon monoxide and smoke alarms
    - Schemes on offer for private sector landlords
    - Benefit information for landlords
    - Bulky waste removal from your rental property
    - Tenant and landlord disputes

- Landlord Forum – Landlord forums are free to attend and held periodically. They provide an opportunity for landlords, agents and property professionals to keep ahead with the latest developments in local and national updates relating to private rental standards and for landlords and agents to share experiences of renting accommodation in Havering.

9.2 Supporting private rented sector tenants

The Council provides help and support to tenants living in private rented accommodation including the following:

- **Online support** - Comprehensive information is available to tenants on the Council's dedicated webpages which provides information on:
    - Why rent privately?
    - Private rented tenancies
    - Rent arrears prevention
    - Evictions
    - Tenant and landlord disputes
    - Intermediate rent
    - Rent to buy

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9.3 Combining licensing with measures taken by others local organisations in the area

Selective Licensing is not a solution, but a key tool to be used with other initiatives and partnerships to tackle issues affecting the PRS. There are a range of partnerships and collaborations that need to be working effectively to support these designations of selective licencing in the applicable areas.

Havering Council will continue to build on the good working relationship with their internal and external partners that has been established as part of the licensing schemes to date, and business as usual private sector enforcement.

The Private Sector Housing team works collaboratively with partner organisations and neighbouring local authorities to support vulnerable tenants, combat rogue and criminal operators and to create a safer and better community for its residents. Key partners include the London Fire Brigade, with whom the team take a coordinated approach to tackling problematic properties, and the Metropolitan Police, where criminal activities such as modern-day slavery are identified. Officers also work closely with resident associations, providing support in cases where building managers are neglecting repair responsibilities.

The council has been working in partnership with Safer Renting, an organisation that helps to prevent homelessness, by intervening in tenant harassment and illegal evictions. Over the past four years, the council have also referred tenants to our partner organisation, Justice for Tenants, to help Havering renters navigate the complex legal process of obtaining Rent Repayment Orders (RROs) against their landlords. The Private Housing Team has subsequently provided evidence in support of several cases, resulting in successful RRO settlements.

With the aim of seeking to assist landlords and improve the PRS, the council will also continue to actively promote Landlord Accreditation Schemes including the London Landlord Accreditation Scheme (LLAS) and provide discounts to accredited landlords.

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Working in partnership to help identify and disrupt modern slavery and human trafficking

The implementation of selective and additional licensing schemes in an area, complemented by routine monitoring of properties and proactive campaigns to uncover unlicensed properties not only ensures property standards are improved but also aids in identifying and addressing other potential issues in the designated area.

There is an intrinsic link between slavery and housing; not all rogue housing will involve slavery, but virtually all cases of slavery will involve some form of substandard housing. Cases of slavery have been discovered when councils have investigated noise complaints or reports of ‘beds in sheds’; therefore, regulation of private rented sector housing, including licensing schemes, can and has been used effectively to disrupt slavery[19].

In its most recent statement on Modern Slavery, the Council states it is committed to working collaboratively with all relevant organisations across all sectors to support the residents of Havering, who have been affected by Modern Slavery. The Council also works closely with neighbouring boroughs, and the Care Quality Commission (CQC) sharing intelligence and reciprocating with boroughs[20].

[19] Councillor guide to tackling modern slavery
[20] Havering Modern Slavery Statement 2025

Expanding property licensing to cover a wider section of the private rented sector would strengthen the Council's ability to proactively gather intelligence, monitor housing conditions, and respond more swiftly to concerns around exploitation, safety, and wellbeing. The new Additional and Selective licensing schemes will provide the Council with an essential tool for improving housing standards and supporting vulnerable residents across the borough.

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10. Alternatives to licensing that have been considered

Before pursuing selective and additional licensing scheme proposals, Havering council gave consideration to a wide range of actions that may have been effective in tackling poor housing conditions and raising management standards in the PRS. The Private Sector Housing team have considered other courses of action, or alternatives, to the property licensing proposals, but do not believe that, individually or collectively, they provide an effective, or as effective means of tackling poor housing conditions and poor management standards in the borough. Table 5 shows the alternatives that the council have considered and explains why they are not sufficient to meet our objectives.

Alternative Measure	Strengths	Weaknesses
Do nothing	N/A	Evidence has shown that the areas proposed for selective and additional licensing are subject to conditions that require intervention. In line with the Council Plan commitments, and the need to ensure the PRS is properly managed and regulated, the option of doing nothing is not an option. If no action is taken the problems experienced in the relevant wards and across the borough are likely to continue.
Use of Part 1 Housing Act 2004 enforcement powers [HHSRS] and Public Health powers	Following an investigation, formal statutory notices can be served that require improvements to be carried out to a property. Councils can carry out work in default if a notice is not complied with. Landlords risk being prosecuted if they do not comply with the notice, or the Council can impose a civil penalty on the person responsible.	The powers do not place any obligation on landlords to be proactive in improving conditions. Formal action is generally slow, with appeal provisions against most types of notices served, which can significantly delay the time period for compliance. Work in default can be effective, but it is expensive and time-consuming to the Council, with the risk that not all costs are recovered. Successful prosecutions and civil penalties do not in themselves secure improvements in property conditions and the Council's costs in pursuing legal action are often not met in full.
Rely on prosecutions and civil penalties for housing offences	Provides landlords with a disincentive to	These powers do not place any obligation on landlords to be proactive in improving conditions. Successful

Alternative Measure	Strengths	Weaknesses
	keep properties in poor conditions.	prosecutions, or the imposition of civil penalties, do not in themselves secure improvements in property conditions. The absence of licensing significantly reduces the scope of the Council to impose civil penalties in respect of identified housing breaches.
Wider promotion of voluntary accreditation schemes to facilitate improvement in management practices and standards	For those landlords who take part, accreditation can increase their knowledge and competence and their ability to effectively manage a property.	This requires voluntary landlord engagement, and rogue operators are unlikely to attend/engage in such schemes.
Improvement grants to improve sub-standard properties	Grants subsidise improvement works, improving standards and giving benefits for landlords and tenants.	Generally, there are few grants available, and the Council has very limited scope to offer grants through successful external funding bids. In the most part, grant awards would fund improvements that the landlord should be carrying out to meet their legal obligations. Any grant scheme would be discretionary and would rely on voluntary landlord engagement.
ASB powers	Formal notices can be served at addresses identified as having ASB issues. This can resolve ASB at the particular address.	Action would generally be taken against the tenant in occupation. The powers do not place any obligations on landlords to be proactive in managing their properties to prevent or reduce the likelihood of ASB occurring.
Renters Rights Bill (Introduced to Parliament September 2024)	Will give the Council greater enforcement and investigatory powers.	Does not put in place a proactive approach to housing standards and still relies on tenants complaining and landlords being upfront about issues.

Table 5: The alternatives to licensing that have been considered by the Council

Each of the above powers or measures support the Council in achieving the objectives of selective and additional licensing, but none of them, either individually or collectively, can achieve the objectives that Havering intends to deliver through the proposed licensing schemes.

11. Licensing Scheme Objectives

Licensing is a crucial part of the council's comprehensive strategy to improve the PRS and deliver better standards for private renters. The council has implemented a range of initiatives and methods to achieve this goal, and licensing is one of them. Selective and additional licensing schemes would place the responsibility on landlords to inform the council that their property is licensable and to ensure that they meet the required standards with the council's support. The council can then prioritise its resources effectively to deal with the properties of most concern and target enforcement actions to those landlords who fail to license their properties and/or breach licence conditions.

Property licensing gives the Council the capability, through significantly increased staffing resources, to undertake a large programme of proactive audit inspections and greater opportunities to work with both internal and external partners to bring about the improvements that are necessary. Havering Council has seen through their existing licensing schemes that such interventions enable them to detect and tackle hazards much more effectively. However, further work needs to be done in educating those landlords outside of existing licensing regimes in improving the management of their properties.

The council propose to use licensing to improve the standard of property management in the PRS, to ensure that PRS properties meet minimum health and safety standards and to keep their residents safe.

The council have identified a number of key scheme objectives (Table 6), which they are committed to meeting over the life of an approved schemes. Outcomes will be reviewed and details published on the council's website, in line with the best practice guidance included in the General Approval.

	Objective	Performance Indicator	Outcome
1.	**Improve housing conditions in the PRS by eliminating poor property standards**	• 100% of all licence applications desk-based risk assessed • 70% of all selective licensed properties and 100% of all HMO licensed properties inspected at least once during the duration of the licence, informed by a data-led risk assessment • At least 75% of licensable properties licensed over 5 years • All Category 1 and high scoring category 2 hazards mitigated where statutory notice has been served.	• Licensed properties are monitored, and licence conditions robustly enforced and complied with • Poor Housing Conditions are improved with category 1 & high scoring category 2 hazards resolved (including issues such as damp and mould) • Improved health, safety and welfare of tenants in the PRS • The Council will gain increased knowledge of the private rented sector in the borough. This will enable targeted enforcement and support for landlords

2.	**Improve management standards in PRS properties**	• 70% of all selective licensed properties inspected at least once during the duration of the licence, informed by a data-led risk assessment • 100% of all HMO licensed properties inspected at least once during the duration of the licence, informed by a data-led risk assessment • Take appropriate enforcement action against those landlords who fail to license or breach licence conditions • 2 landlord forums per annum	• Landlords actively manage their properties or be enforced against • Absentee or unfit landlords employ an agent to actively manage their properties to ensure compliance • Prevention of overcrowding through better management of property occupancy • Greater number of landlords become accredited improving the professionalism of landlords in the PRS • Engagement with landlords improved • Landlords are kept informed of latest legislation and good practice • Responsible landlords will become more involved in Council licensing schemes and receive information and support • Irresponsible landlords will be forced to improve their properties or be enforced against
3.	**Increased awareness for tenants of the minimum standards to be expected in rented accommodation and what their other rights are when renting in the PRS**	• Deliver an education campaign to make renters aware of licensing, tenancy rights and responsibilities and services available • Work with third parties to provide additional advice and support with tenancy rights • Tenant Forums to be set up, learning from experience of other Councils	• Information for tenants on the local licensing scheme advertised and third-party support for tenants made available • Dedicated tenants' advice section created on web site • Officers to provide tenants with information and sign posting to support their housing and wider needs • Improved tenants' support through work with third parties. • Renters know their rights and responsibilities and have greater awareness of and access to Council services that can support them • Tenants will see economic benefits such as reduced heating costs, bringing them out of fuel poverty

Table 6: Council objectives, expected outcomes and targets in relation to PRS licensing

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12. Compliance and Enforcement

To achieve the council's objectives, the selective and additional licensing schemes will need robust enforcement plans to ensure compliance, and therefore realising the positive outcomes detailed above.

12.1 Compliance with existing schemes

In addition to the national mandatory HMO licensing scheme, in 2018 Havering implemented an additional HMO licensing scheme in 12 wards and in 2021 a second additional HMO licensing scheme in a further 6 wards. Also, in 2021 Havering introduced a selective licensing scheme (in two wards, which became three wards following boundary changes) to improve safety standards for tenants living in the PRS.

The selective licensing scheme was implemented in the wards of Brooklands and Romford Town, which because of the boundary ward changes in May 2022 became three wards (Rush Green and Crowlands, St Alban's & St Edward's) and applies to properties rented to an individual, a single family or two unrelated sharers.

The Council implemented a robust inspection and enforcement regime, that has ensured that licences are applied for, valid applications processed and there is compliance with the conditions of licences issued.

Nearly 250 properties were licensed under the additional HMO scheme and 3,627 under the selective licensing pilot scheme.

Licence type	Licences granted
Mandatory	386
Additional	241
Selective (pilot)	3,627
TOTAL	4,254

Table 7: Licence figures for licensing schemes in Havering

Through the licensing schemes, the council has been able to improve basic standards, often in the most dangerous housing at the bottom end of the housing market, where some of the most vulnerable people in society live. Licences have conditions attached which must be complied with, allowing the council to regulate the PRS, improve housing conditions, and foster better management standards.

All licence applications receive a desk-based risk assessment. This has enabled the council to impose a level of 'self-regulation' in the PRS, as landlords will not be granted a licence unless they are able to demonstrate at the time of application that they are a 'fit and proper' person to be the licence holder and also that the property complies with fire, gas and electrical safety conditions.

As part of the licensing process properties are risk assessed and prioritised for compliance inspections. Properties identified as high risk will be inspected before a licence is granted, ensuring that potential issues are addressed promptly. Additionally, the council leverages intelligence gathered from the licensing database to identify applications that have been initiated but remain incomplete. This strategic approach forms the basis for tasking days, during which these properties are visited to verify their licensing status and action taken to ensure where appropriate licence applications are completed and submitted.

In the last 12 months over 360 inspections have been undertaken using an intelligence-driven approach. Licensing requires landlords to proactively manage their properties and take reasonable action to rectify any identified problems to ensure compliance with licence conditions. The Private Sector Housing team have employed a range of enforcement tools at their disposal, including issuing statutory notices, such as improvement notices, notices relating to civil penalties and prohibition orders, encompassing the full scope of Housing and Environmental Health legislation. This has resulted in much-needed improvements and raised the standards of poor accommodation across the borough, benefiting many tenants.

12.2 Measures to ensure compliance with the new scheme

Administration of licences

During the additional HMO and selective licensing schemes, Havering had a team of officers engaged in assessing, processing, and issuing licences in the borough. This enabled Havering to build an experienced licensing team and streamline processes for the administration of licences and the inspection of properties. Havering has a fully integrated online application form with online payment system that is fully integrated with its case management system.

The Council recognises the importance of ensuring that all applications are processed and decisions on whether to grant or refuse a licence are made within a reasonable period of time. Management processes are in place, including the use of IT dashboards and performance reports enabling progress to be effectively monitored and managed. During the lifetime of the two additional licensing schemes and the selective licensing scheme, Havering has processed in the region of 4500 licence applications. On receipt of a complete application and appropriate fee, the applicant and all interested parties are notified whether they propose to grant or refuse a licence. This is followed by a 21-day consultation period which gives the applicant, and all interested parties the chance to make representations. At the end of the consultation period the licence will be granted, ensuring that part B payments are collected without significant delay. The median average time taken from receiving an application to issuing a full licence is approximately 4 months.

The Council will ensure that it is adequately resourced to maintain this level of service. To manage the influx of applications generated by the introduction of the new licensing schemes, it is the Council's intention to recruit additional processing officers, should the scheme be approved at Cabinet.

Monitoring compliance

Lessons learnt from existing licensing schemes will be used to shape the Council's overall approach to ensuring compliance is achieved in any new designation. Several robust methods are

already in place and Havering Council will continue to use these methods to ensure that landlords comply both in terms of becoming licensed and complying with their licence conditions in accordance with the Council's enforcement plan.

Measures that are in place to monitor compliance include:

- Dashboards have been set up to monitor all applications received, at a ward and street level providing detailed, real-time insights into application trends and statuses. This allows for efficient tracking and management of applications, ensuring that any issues or non-compliance can be quickly identified and addressed.
- Using land registry and deposit protection scheme data to target unlicensed properties in the designated areas. Applications received will be monitored against this database to detect streets/areas with low application rates.
- On receipt of application, properties/applications are risk assessed. Those properties with the highest risk factors are prioritised for inspection.
- The reporting of unlicensed properties by members of the public, visiting professionals and tenants is actively encouraged via various communication methods. This is complemented with an online tool that allows for the easy recognition of unlicensed properties and online reporting for those that are found not to be licensed.

Steps to encourage compliance

To encourage compliance with the new scheme, Havering will also implement the following measures:

- Regular Messaging Reviews - collaborating with corporate communications to continuously review and update messaging.
- Public Posters - displaying posters in public buildings to inform landlords and tenants about the scheme and encourage applications.
- Mail Shots to Agents – sending targeted mail shots to managing and letting agents to inform their client base.
- Targeted Letters - sending letters to designated areas, especially high-risk streets, urging tenants to check if their property is licensed and to inform their landlord or the council.
- Digital Communications - using digital channels to reach both in-borough and out-of-borough landlords. This was particularly successful at reaching both types of landlords during the consultation and will be used again to highlight the scheme requirements and promote successful enforcement outcomes such as prosecutions and civil penalties.
-

12.3 Measures that will be in place where there is non-compliance

The Council will use intelligence gathered via licence applications and service requests, to target enforcement action towards the minority of landlords who fail to invest in their properties or meet their legal obligations.

The Private Sector Housing Enforcement Policy, provides details on how the enforcement tools provided by the Housing Act 2004 and the Housing and Planning Act 2016, will be used fairly and consistently to achieve improvements in housing, health and the environment in the Borough. In accordance with the enforcement policy an opportunity will be given to landlords to be self-

regulating, wherever possible and to put things right when things go wrong. The Council will therefore focus its enforcement activity where this self-regulation fails.

Once an audit or inspection has led to the identification of non-compliance with licence conditions, the Council offer advice or a warning in the first instance, but only if the breach is not so serious as to require immediate enforcement action to address high risk or very harmful situations. However, if there is a history of non-compliance, a persistent breach, or low confidence of compliance, the Council will not hesitate in taking robust enforcement action using all enforcement powers available, including notices, prohibition orders, emergency remedial action (ERA), financial penalties, legal action (such as banning orders), and prosecution.

Where the Council is unable to grant or revoke a licence, the Council may use its powers to make an Interim Management Order to take over the management of the property. Additionally, for any period where an unlicensed property is found to be rented, the Council may use its powers to make an application for a Rent Repayment Order limited for up to 12 months while the offence is being committed. The details of all landlords who have been prosecuted shall be publicised on the London Rogue Landlord and Agent database.

Whilst the licensing schemes to date have enabled the Council to begin to make real progress in raising standards in the private rented sector, the evidence is that there is still much more to do. Table 8 below summarises the Councils' enforcement outcomes that have been achieved through its existing licensing schemes and the measures in place to tackle non-compliance.

Activity	Number
Statutory Notices served	866
Prosecutions	5
Civil Penalties Intentions/Finals	55

Table 8: Enforcement action for non-compliance (2020 - 2025)

Through the administration and enforcement of the licensing schemes, the Council has also been able to place greater onus and responsibility on licence holders to prevent ASB in their rented homes, to investigate any reported ASB incidents and to take appropriate action to address any evidenced issues.

In recent research published in BMJ Open, researchers from the School for Public Health Research have found that the licensing of private rented housing in London is associated with less ASB and with less calls being made regarding ASB concerns[21].

The council has collaborated with multi-agency partners, including the fire service, police, Community Safety team, and Planning Enforcement teams to address various issues. As demonstrated by case study 2 earlier in the report. This collaborative approach has proven effective in enhancing community safety and improving property conditions.

[21] Impact of selective licensing schemes for private rental housing on mental health and social outcomes in Greater London, England: a natural experiment study Petersen J, et al. BMJ Open 2022

As demonstrated above, the licensing schemes have enabled the Council to make a real and notable difference in driving up improvements for Havering's most vulnerable. The tragic death of Awaab Ishak demonstrates the need to focus our attention on relentlessly addressing standards through robust enforcement measures.

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13. Consultation

Sections 56(3) and 80(9) of the Housing Act 2004 requires that when considering designating an additional or selective licensing area the local housing authority must take reasonable steps to consult persons who are likely to be affected by the designation, and consider any representations made in accordance with the consultation and not withdrawn.

Havering Council undertook an extensive public consultation, widely publicised using various channels of communication, for 12-weeks between 14 April 2025 and 6 July 2025. The consultation sought views from all those that are likely to be affected by the proposed schemes both within and outside of the borough, including residents, private tenants, private landlords, letting agents, managing agents, businesses, and other stakeholders.

13.1 Consultation methods

The consultation used the following methods and was promoted through the council's communications channels and local and regional media:

Consultation Method	Response
Online survey	An open access online survey (incorporating both a quantitative approach and qualitative responses through free text boxes) which received a total of 403 responses.
Public forums	Two virtual public forums were held for landlords, residents and other stakeholders and attended by 143 people.
Other written feedback	The council accepted feedback on the proposed licensing schemes by email or written response. Responses were received from three stakeholder organisations.

Table 9: Summary of methods used for consultation on selective licensing

A dedicated phone and e-mail address were also available to residents, landlords and other stakeholders to ask questions about the proposals and consultation or receive help to respond to the consultation. 31 emails were received and responded to during the consultation period.

13.2 Communication channels

The council used a wide range of communication channels to promote the consultation and make stakeholders aware of the proposals. Various activities were undertaken to engage all stakeholder groups, both within and outside the borough. Key activities included:

- Updating the council website homepage with a news article and a link to the consultation on 14 April and 4 July 2025
- A press release to announce the start of the consultation was published on 14 April 2025
- A press release to announce the consultation would soon close was published on 4 July 2025
- The press release was linked to relevant housing web pages

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- Approximately 300 leaflets were distributed at food banks and children centres
- A direct email was sent to 16 faith groups
- A direct email was sent to key stakeholders including all London councils, neighbouring borough councils, landlord accreditation and membership organisations, housing charities, emergency service commanders and integrated care boards on 24 June 2025.

13.3 Reaching the digitally excluded

Activities to make digitally excluded and vulnerable stakeholders aware of the consultation included:

Posters and leaflets were sent to the following foodbanks

- Collier Row and Romford
- Harold Hill
- Rainham

Paper copies of the consultation were available at the following locations within the borough from 14 April 2025:

- Collier Row Library
- Elm Park Library
- Gidea Park Library
- Harold Hill Library
- Harold Wood Library
- Hornchurch Library
- Rainham Library
- Romford Library
- South Hornchurch Library
- Upminster Library.

Reaching out to local community and outreach groups to ask them to share the consultation with the groups they interact with via the Live Well Havering Network and sharing with the following organisations:

- Collier Row Children's Centre
- Elm Park Children's Centre
- Ingrebourne Children's Centre
- Rainham Village Children's Centre
- St Kilda Children's Centre
- Acorn Specialist Children's Centre
- Avelon Road Centre
- Yew Tree Resource Centre

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- Collier Row and Romford Foodbank
- Harold Hill Foodbank
- Rainham Foodbank

The following organisations were included on the press release distribution list:

- Generation Rent
- Justice for Tenants
- Flat Justice
- Cambridge House
- Age UK Redbridge, Barking & Havering
- Reform
- Crisis
- Forward Trust
- Shelter
- Renters Rights London
- Refugee Council
- Central YMCA
- Citizens Advice Havering

13.4 Reaching out-of-borough landlords

Additional effort, was also made to ensure that landlords who are resident outside the borough were also advised of the consultation exercise, activities included:

- An out of home campaign with adverts added to Global, Clear Channel and JC Decaux media sites displayed in the neighbouring boroughs of Bexley, Barking & Dagenham, Epping, Brentwood, Thurrock and 24 bus routes leaving Dartford Bus garage.
- Details of the consultation was sent via direct emails to all Leader's offices, Chief Executives, Regulatory and Housing services at all London borough Councils
- A thorough digital marketing campaign was also undertaken which targeted landlords living outside the borough.

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13.5 Consultation results

The consultation reached a good representative section of those who may be affected by the designation, with a total of 403 responses to the consultation survey being received.

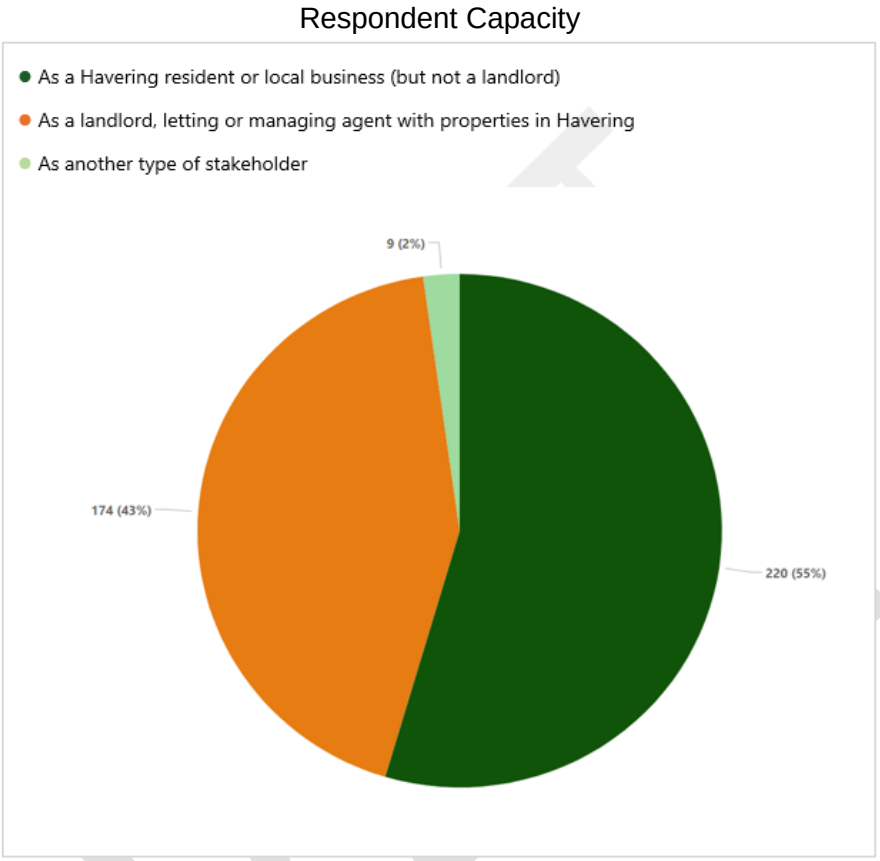


Figure 25: Level of engagement of landlords and agents versus residents (including private tenants) or business

Landlords, letting or managing agents who responded to the consultation were asked if they lived in Havering. Of the **174** landlords, letting or managing agents who responded to this question, **94 (54** per cent**)** said they lived in Havering, and **80 (46** per cent**)** said they lived outside of Havering. The survey responses confirm that the consultation reached landlords living outside the borough as well as those resident in Havering.

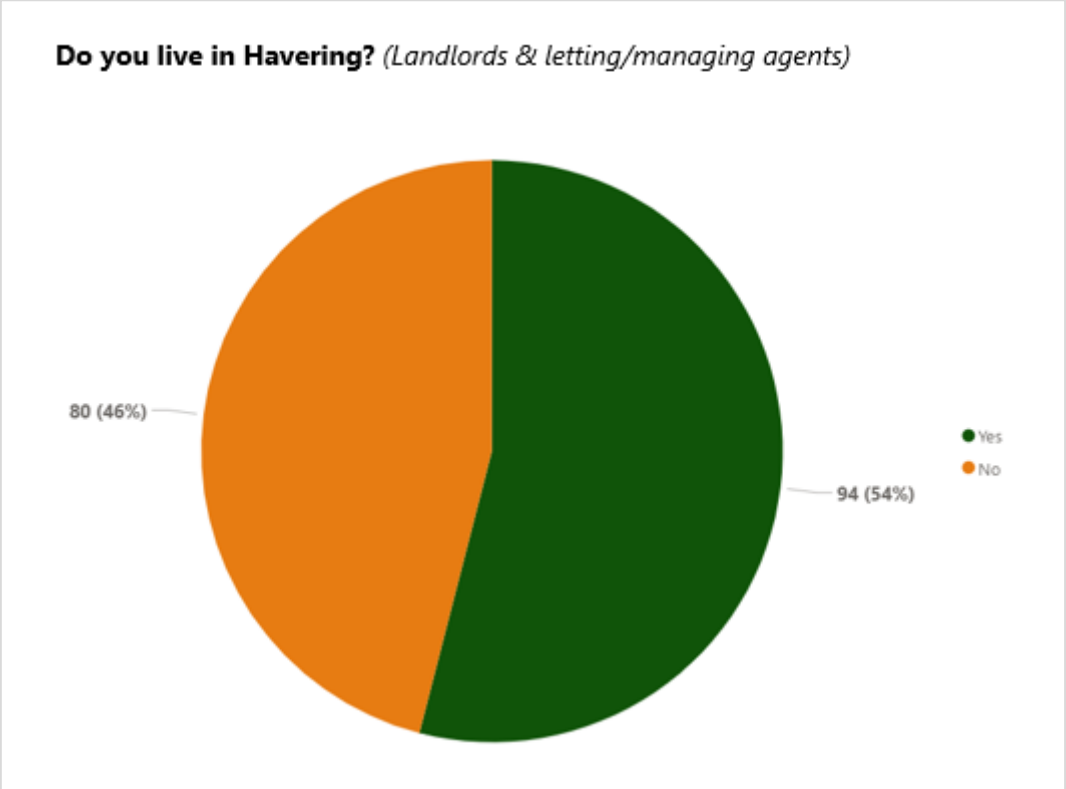


Figure 26: Location of landlords/agents (in or out of the borough)

Key consultation findings

The consultation looked at the level of support for introducing an additional HMO and a selective licensing scheme and sought views on the proposed licence conditions, associated fees, potential discounts, scheme objectives and the respondents' perceptions of the issues of poor property conditions anti-social behaviour (ASB) in the borough. The results are summarised in Table 10 below. The table does not show the 'don't know/neither agree nor disagree' categories, therefore the percentages do not total 100%.

Selective Overall		Landlords, letting or managing agents	Residents (including private tenants) and businesses	Other stakeholders
Total consultation survey responses	**403 responses**	174 responses	220 responses	9 responses

Total responses to the question	**403 responses**	174 responses	220 responses	9 responses
Agree with selective licensing proposal	**41%**	11%	63%	78%

Disagree with selective licensing proposal	**47%**	75%	27%	11%

Total responses to the question	**403 responses**	174 responses	220 responses	9 responses
Agree with proposed selective licensing conditions	**44%**	12%	67%	6 7%
Disagree with proposed selective licensing conditions	**38%**	62%	20%	0%

Total responses to the question	**403 responses**	174 responses	220 responses	9 responses
Selective licensing fee is about right	**21%**	4%	33%	44%
Selective licensing fee is too low	**18%**	0%	32%	11%
Selective licensing fee is too high	**52%**	93%	20%	22%

Additional HMO Overall		**Landlords, letting or managing agents**	**Residents (including private tenants) and business**	**Other stakeholders**
Total consultation survey responses	**403 responses**	174 responses	220 responses	9 responses

Total responses to the question	**403 responses**	174 responses	220 responses	9 responses
Agree with additional HMO licensing proposal	**59%**	45%	69%	89%
Disagree with additional HMO licensing proposal	**31%**	36%	28%	0%

Total responses to the question	**403 responses**	174 responses	220 responses	9 responses
Agree with proposed additional HMO licensing conditions	**47%**	24%	65%	78%
Disagree with proposed	**26%**	32%	21%	0%

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additional HMO licensing conditions				

Total responses to the question	**403 responses**	174 responses	220 responses	9 responses
Additional HMO licensing fee is about right	**21%**	10%	29%	56%
Additional HMO licensing fee is too low	**22%**	4%	36%	11%
Additional HMO licensing fee is too high	**45%**	76%	21%	11%

Scheme Objectives		**Landlords, letting or managing agents**	**Residents (including private tenants) and business**	**Other stakeholders**
Total consultation survey responses	**403 responses**	174 responses	220 responses	9 responses

Total responses to the question	**403 responses**	174 responses	220 responses	9 responses
Agree with scheme objectives	**43%**	15%	64%	67%
Disagree with scheme objectives	**37%**	60%	20%	22%

Table 10: Summary of key consultation findings

13.6 Views on the proposed selective licensing scheme

The results of the consultation show that 41% of respondents agree with the proposal for selective licensing and 47% disagree, with views strongly polarised between stakeholder groups. Residents (including private tenants) and business and other stakeholders are more in favour of the proposals with 63% and 78% respectively agreeing. Landlords are opposed to the proposals with 75% disagreeing.

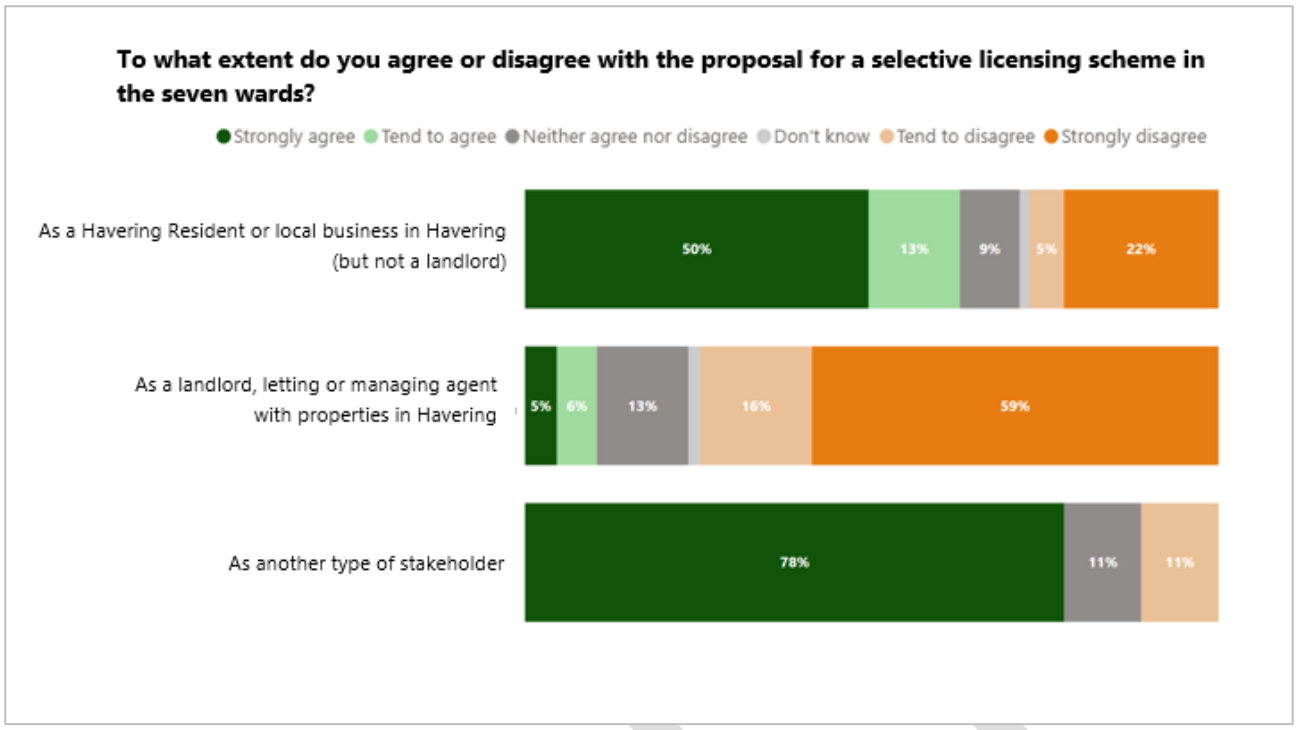


Figure 27: Respondents views on the selective licensing proposal by stakeholder group

13.7 Views on the proposed additional HMO licensing scheme

The consultation results show 59% of respondents agree with the proposal for additional HMO licensing scheme and 31% disagree although views were less polarised between stakeholder groups. Residents (including private tenants) and business and other stakeholders are more in favour of the proposals with 69% and 89% respectively agreeing with 45% of Landlords also agreeing and 36% disagreeing.

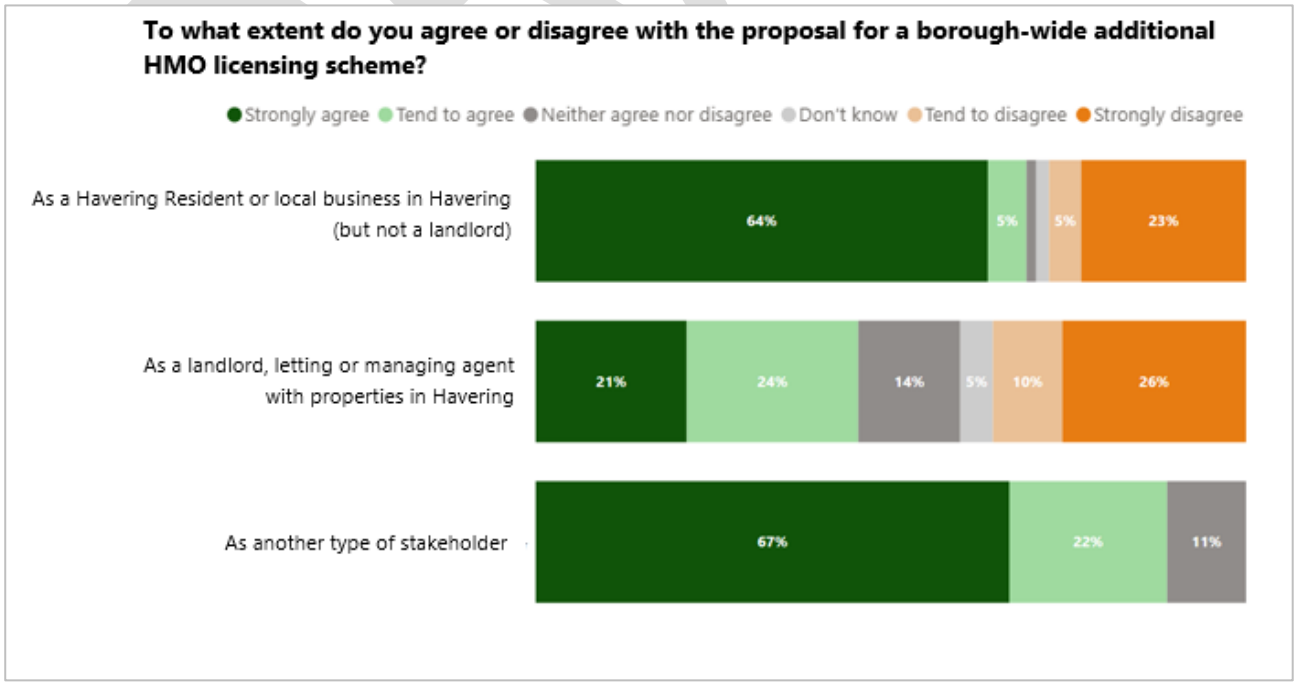


Figure 28: Respondents' views on proposed additional HMO licensing scheme by stakeholder group

13.8 Views on the proposed selective licensing scheme conditions

The consultation asked respondents for their views on the proposed selective licensing scheme conditions. The overall majority of respondents, 44% agreed with the proposed licence conditions, while 38% of respondents disagreed.

Looking at the responses by stakeholder group, residents (including private tenants) or local businesses and other stakeholders are in favour, with the majority, **67** per cent, of each group agreeing, whereas landlords, letting and managing agents are opposed, with **62** per cent disagreeing with the selective licensing conditions.

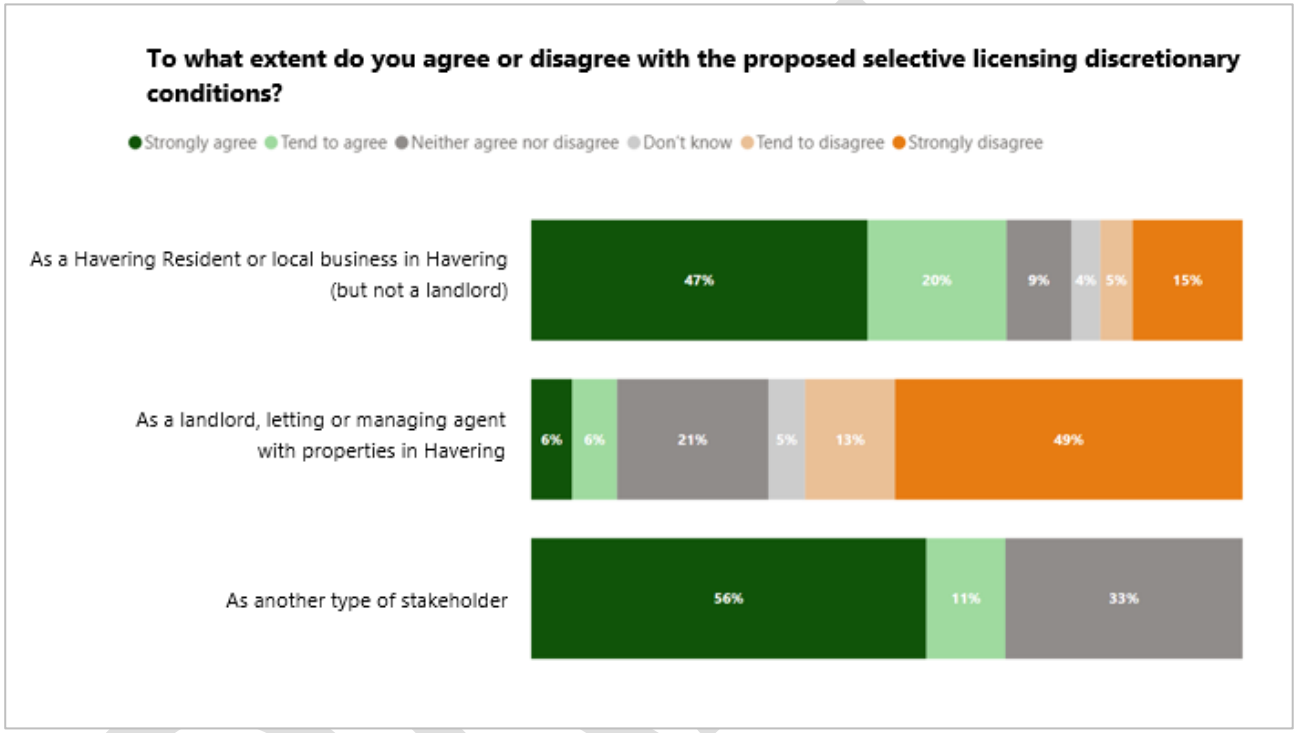


Figure 29: Respondents' views on selective licensing discretionary conditions by stakeholder group

13.9 Views on the proposed additional HMO licensing scheme conditions

The consultation asked respondents for their views on the proposed additional HMO licensing scheme conditions. Most respondents, **47** per cent, agreed with the proposed additional HMO licence conditions, while **26** per cent of respondents disagreed. A proportion of respondents **27** per cent, neither agreed nor disagreed or didn't know.

Looking at the responses by stakeholder group, residents (including private tenants) or local businesses and other stakeholders are in favour, with the majority, **65** per cent and **77** per cent of each group respectively, agreeing with the additional HMO licensing conditions. Landlords, letting and managing agents had more mixed views, with **32** per cent disagreeing, **24** per cent agreeing with the additional HMO licensing conditions, and **43** per cent saying they neither agreed nor disagreed, or didn't know.

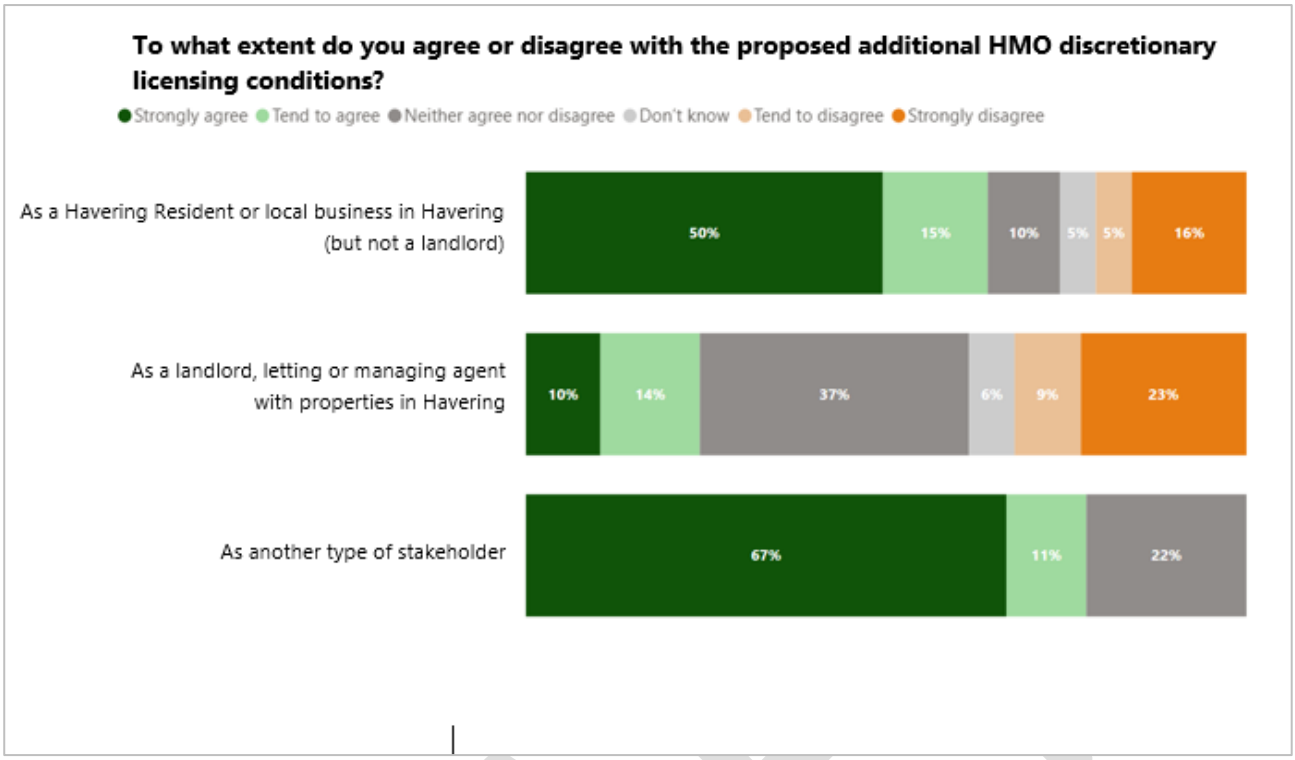


Figure 30: Respondents' views on additional HMO discretionary licensing conditions by stakeholder group

13.10 Views on the proposed selective licensing scheme fee

Respondents were asked how reasonable they feel the proposed selective licence fee of £950 for a five-year licence is. Most respondents, **52** per cent, said that they thought that the fee is too high, as opposed to **39** per cent who thought it was 'about right' or too low.
Landlords, letting and managing agents were consistent in responding that the fee is too high, with **93** per cent selecting this option; the other stakeholder groups had more positive responses with **65** per cent of residents or local businesses and **55** per cent of all other stakeholders responding that the fee is 'about right' or too low. A smaller percentage from each of these two stakeholder groups (**20** and **22** percent respectively) responded that the fee is too high.

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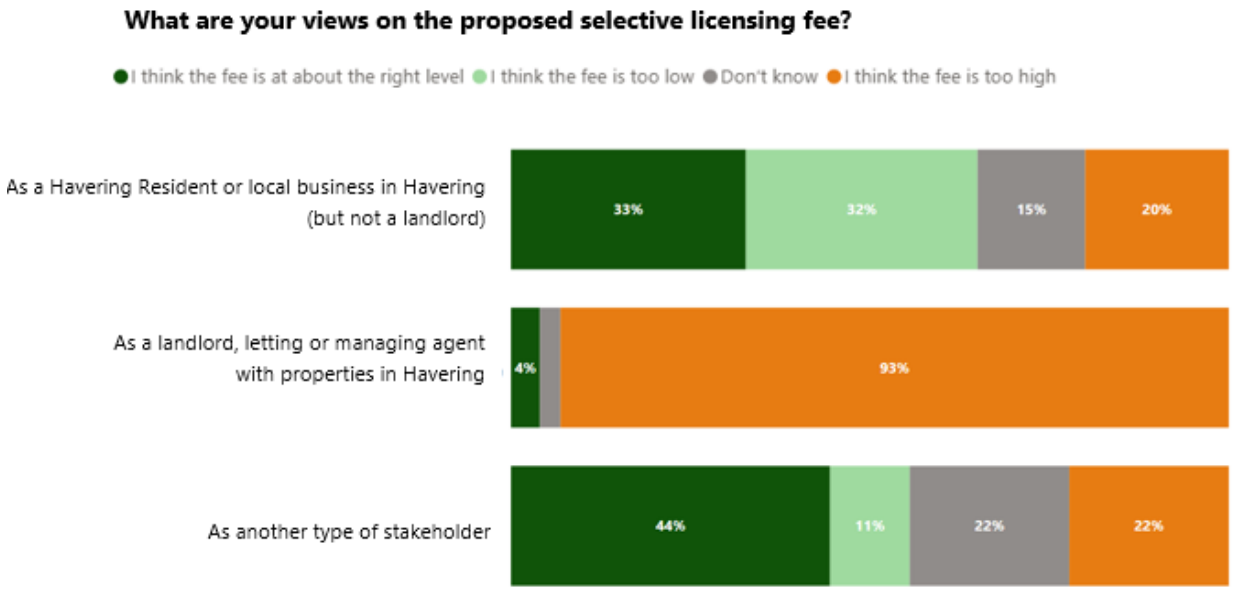


Figure 31: Respondents' views on the proposed selective licensing fee by stakeholder group

13.11 Views on the proposed additional HMO licensing scheme fees

Respondents were also asked how reasonable they feel the proposed additional HMO licence fee of £1400 for a five-year licence is. Most respondents, **45** per cent, said that they thought that the fee is too high. However, **43** per cent of respondents thought the fee was either 'about right' or too low.

Landlords, letting and managing agents were consistent in responding that the fee is too high, with **76** per cent selecting this option; the other stakeholder groups had more positive responses, with **65** per cent of residents or local businesses and **67** per cent of all other stakeholders responding that the fee is either 'about right' or too low. A smaller percentage from each of these two stakeholder groups (**21** and **11** percent respectively) responded that the fee is too high.

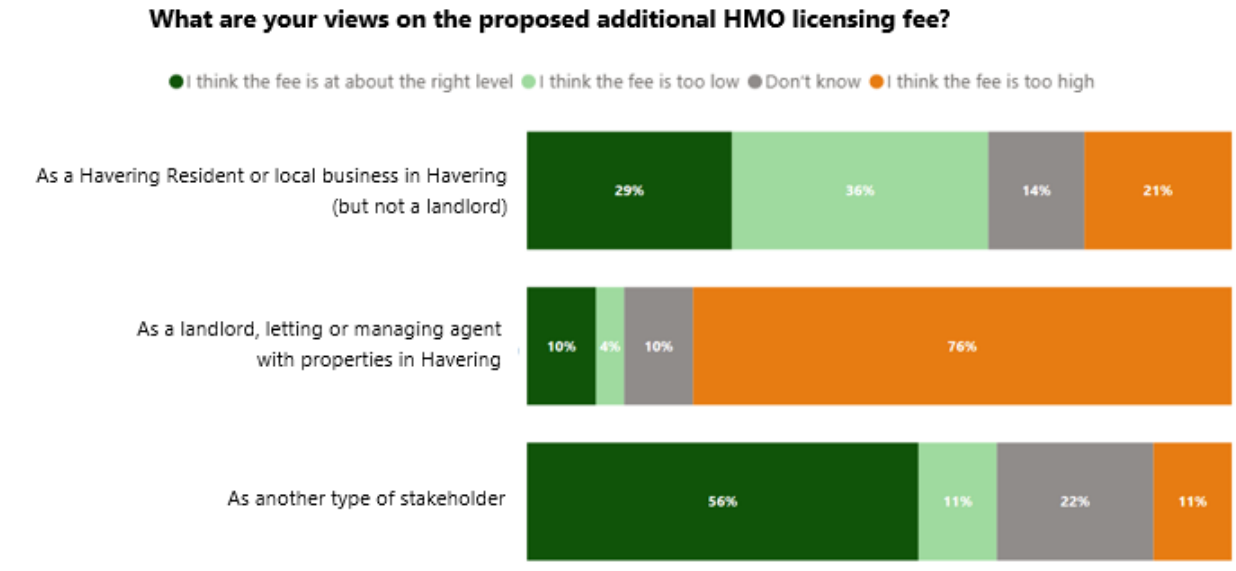


Figure 32: Respondents' views on proposed additional HMO licensing fee by stakeholder group

13.12 Views on the proposed licensing scheme discounts

Nature of discount	Amount (Selective)	Amount (Additional)
Accredited landlord	£100 off Part B	£100 off Part B
EPC C and above rating	£75 off Part B	£75 off Part B
Multi-dwelling	£100 off Part A	£100 off Part A

Table 11: Proposed scheme discounts consulted on

Respondents were asked how reasonable they felt the proposed licensing fee discounts (shown in the table above) were.

Looking at the results by stakeholder group, around **75** per cent of landlords, letting and managing agents viewed the accredited landlord and EPC discounts as too low. When considering the multi-dwelling discount, a slightly lower proportion, **61** per cent, viewed the discount as too low.

Residents or local businesses views on the discounts are more positive, with over **50** per cent stating they viewed the accredited landlord, EPC multi-dwelling discounts as about the right level or too high, with only around **25** per cent viewing them as too low.

The responses of other stakeholders were more mixed for the Accredited landlord discount, with **44** per cent saying they were about the right level or too high, **33** per cent responding, 'don't know', and **22** per cent saying they were too low. Views on the EPC and multi-dwelling discounts were more favourable, with the majority, **56** per cent, saying they were about the right level.

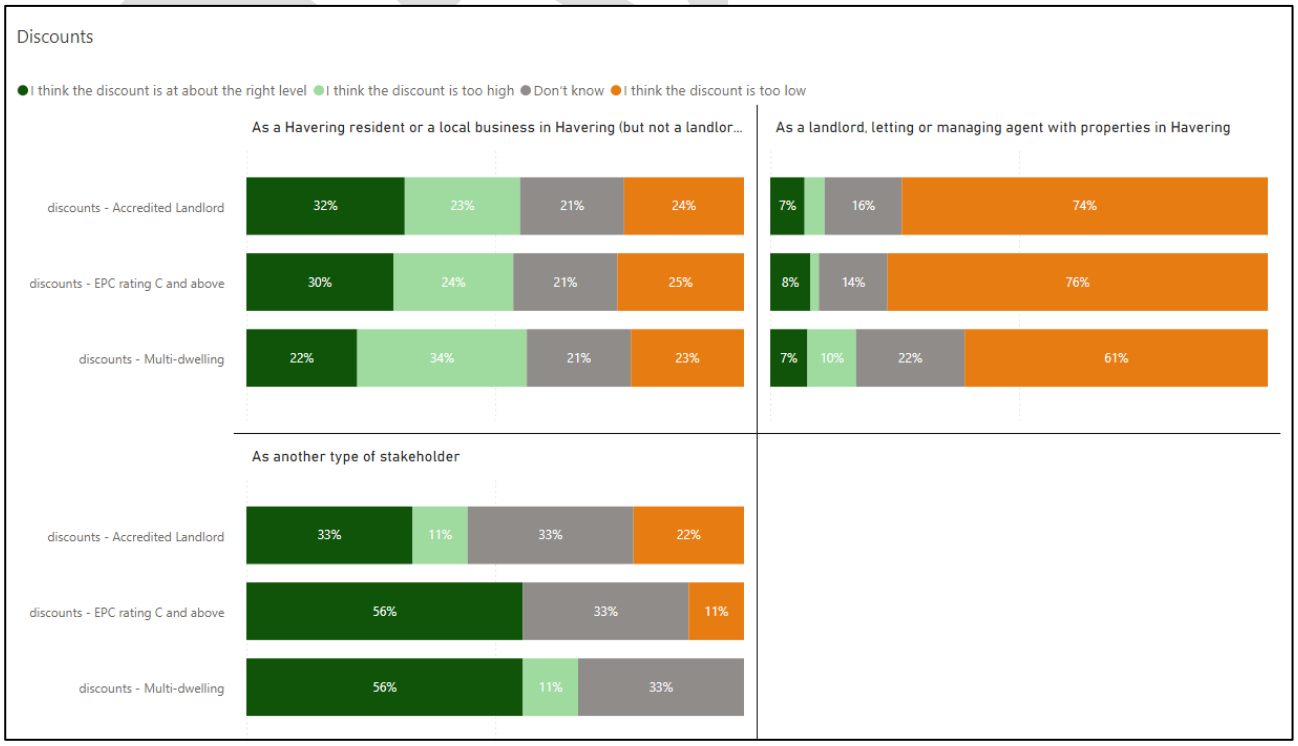


Figure 33: Respondent's views on fee discount by stakeholder group

The evidence shows that Havering Council has gone above and beyond the reasonable steps required to ensure they have consulted with those that are likely to be affected by the proposed schemes, and the consultation exceeded the statutory 10-week consultation period in accordance with the legislation and guidance.

As a result of the feedback and representations received during the public consultation several changes have been made to the scheme, as detailed below.

13.13. Response to representations

The Council has carefully considered all responses, feedback and representations made during the consultation. The consultation report and the response to the consultation will be published on the Council website and are also attached as Appendices 2 and 3.

14. Fees

The proposed fee structure is as follows:

14.1 Fee structure

Licence applicants will be required to pay a fee for each property that needs a licence. Several proposed discounts are outlined below. The proposed fee would be payable in two parts. The first part (Part A) would be payable upon submission of the application for the costs of processing and the administration in determining the application. Should the application be refused or rejected by the council or withdrawn by the applicant this first Part A payment will not be refunded. The second part (Part B) would be payable once the application has been assessed and the decision is made to grant the licence. This will cover the administration, management, and enforcement of the licensing functions for the schemes.

The proposed selective fee is £950 per property, and the proposed additional HMO fee is £1,400 per property. The fee would cover a licence for its duration of 5 years.

The Councils approach to the payment of licence fees is consistent with the judgment in the *Gaskin vs Richmond* case.

Licence Type	Part A Fee	Part B Fee	Total Fee
Selective	£570	£380	**£950**
Additional HMO	£840	£560	**£1,400**

Table 12: Licence fee structure

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14.2 Discounts

The Council has considered a range of measures to ease any financial burden on good landlords in the borough. The reasons for proposing these discounts and the effect of the discount on total selective licence fee payable is detailed in Table 13 below.

Category	Discount	Description	Justification	Total selective licence fee after discount	Total additional HMO licence fee after discount
Accredited Landlord	£100 off Part B	Licence holder or managing agent is accredited under one of the following schemes: • London Landlord Accreditation Scheme (LLAS) • National Residential Landlords Association (NRLA) • UK Association of Letting Agents (UKALA) Or a member of the following schemes: • Association of Residential Letting Agents (ARLA) • Safeagent	Accreditation schemes require landlords and agents to demonstrate their expertise, ability and commitment to managing properties according to the highest standards. The discount recognises those landlords and agents who have taken a proactive approach to the management of their properties and tenancies.	**£850**	**£1,300**
EPC rating C	£75 off Part B	Properties must have an EPC rating of C	Properties with a C and above rated Energy Performance Certificate (EPC), including new builds, are less likely to encounter significant disrepair issues. Consequently, they require fewer inspections and enforcement actions to maintain property standards. Properties with an EPC rating of C or above are generally	**£875**	**£1,325**

			in better condition and less likely to have hazards such as damp, mould, and excess cold. As a result, these properties require fewer inspections and less enforcement action to ensure that property standards are met. This reduction in required resources is reflected in the discount provided to properties with a C or above EPC rating. The aim is to encourage property owners to improve the energy efficiency and overall condition of their properties, which in turn leads to a safer and healthier living environment for tenants. This also aligns to the Council's strategic commitment to climate change.		
Multiple leaseholds within the same freehold	£100 off Part A Part A fee will be payable at the full relate for the first flat. Discount will be applied in respect of applications relating to the 2nd, 3rd properties etc.	Applicable where multiple properties are: a. In common ownership and management control. b. Contiguous with each other in the same block or building c. All applications made at the same time.	There will be efficiencies in processing applications that relate to multiple units under the same ownership and control within the same building, which will result in cost savings.	**£875 (for second, third etc eligible flat in a block)**	**£1,300* (for second, third etc eligible flat in a block)**

**Discount will be applied in respect of applications relating to the 2nd, 3rd properties etc.*

Table 13: Summary of fee discounts offered for selective licensing

Discounts will be determined on receipt of full application and all supporting documents.
Discounts **will not** be applicable where the council has:

- made two requests for additional supporting documents, or
- served a warning letter for failure to license the property
- unlicensed properties brought to their attention

Discounts Applied - Practical Examples

The following examples below illustrate the calculation of the total amount payable for a selective licence after discounts are applied, using a selective licence fee of **£950 (£570 for Part A; £380 for Part B)**.

Scenario A

Scenario A	Property	Discount	Part A	Part B	Total Fee
Landlord has one property with an EPC rating of B	1	Part B reduced by £100	£570	£280	**£850**
		Total	£570	£280	**£850**

Scenario B

Applicants may qualify for more than one discount concurrently, see example in scenario B:

Scenario B	Property	Discount	Part A	Part B	Total Fee
Landlord is accredited and has three properties. Each property is in a different part of the designated area. Properties 1 and 2 have and EPC rating of D. Property 3 has an EPC rating of C.	1	Part B reduced by £100 (£100 ACLL)	£570	£280	**£850**
	2	Part B reduced by £100 (£100 ACLL)	£570	£280	**£850**
	3	Part B reduced by £200 (£100 ACLL) + (£100 EPCB)	£570	£180	**£750**
		Total	**£1,710**	**£740**	**£2,450**

Scenario C

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Applicants may also apply for a multi-dwelling discount where multiple properties in the same building are owned and under the control of the same person. A multi dwelling discount will be applied in respect of applications relating to the 2nd, 3rd properties etc.

Scenario C	Property	Discount	Part A	Part B	Total Fee
Landlord is accredited and has four properties, 3 of which are in the same building, which has been converted into self-contained flats. Property 1 has an EPC rating of D. Properties 2, 3 and 4 have an EPC rating of C.	1	Part B reduced by £100 (£100 ACLL)	£570	£280	**£850**
	2	Part A reduced by £100 (£100 MD) Part B reduced by £200 (£100 ACLL) + (£100 EPCB)	£470	£180	**£650**
	3	Part A reduced by £100 (£100 MD) Part B reduced by £200 (£100 ACLL) + (£100 EPCB)	£470	£180	**£650**
	4	Part A reduced by £100 (£100 MD) Part B reduced by £200 (£100 ACLL) + (£100 EPCB)	£470	£180	**£650**
		Total	**£1,980**	**£820**	**£2,800**

Table 14: Examples of scenarios where discounts are applied

14.3 Instalment payments

The licence fee is payable in two instalments. The first instalment (Part A) payable when the application is submitted and the second instalment (Part B) payable once the application has been assessed and the decision to grant the licence made.

14.4 How the fee has been calculated

In setting the fee the Council has had regard to the Provision of Service Regulations 2009 and the Housing Act 2004 which confirms that when fixing fees the local authority may consider all costs incurred by the authority in carrying out their functions.

The calculation of fees takes account of the cost of setting up the licensing scheme, processing the applications, of administering any licences subsequently granted and, more generally, exercising its functions under Parts 2 and 3 of the 2004 Act. As such, the cost includes (but are not exhaustive):

(a) Scheme set up cost – costs associated with the initial development of the licensing regime, including the cost of consultation and publishing policies, promotional material, publicity, development of application forms, web material, staff recruitment, and training.

(b) Administration costs - staff time taken to process the application, data inputting, assessment of application, consulting with interested parties and other stakeholders, considering representations, determining license conditions, printing, postage, stationery, telephones, computers, IT licensing software, maintenance of public register, provision of advice and guidance.

(c) On Costs – recharges for payroll, accommodation including heating, supplies, and services connected with the licensing function such as Finance, Legal and HR. Staff training.

(d) Compliance and Enforcement costs - costs associated with initial licensing inspection, responding to complaints, compliance revisits, travel, equipment, stationery, data inputting, and on-costs.

The administration of the scheme is such that it is intended to be self-financing over the life of the scheme. The fees that are being applied are set at a level where the revenue from the fee will cover the cost incurred and will not generate a profit.

The proposed fees are underpinned by assumptions about the level of income the fees will generate, based upon the number of properties that the council expect to be licensed during the lifetime of the schemes and the numbers of those properties that are expected to be eligible for discounts. The fee will be reviewed annually as part of the Council's fees and charges process.

14.5 Benchmarking against other Councils

The Council recognises that the licence fee is higher than the current London average of £720 (Source: London Property Licensing, 2024). However, it is important to note that the fees for many of these current schemes are based on historical financial modelling conducted several years ago. These models do not account for the rising costs incurred by the council in recent years. As such, Havering's proposed fee reflects an adjustment to accommodate these increased costs.

It is also noted that several London Boroughs have recently commenced consultation for new schemes with proposed fees £900 and above. This suggests that the costs of operating a selective licensing scheme in London are significantly rising. Outside of London, licence fees have also risen.

Table 15 below provides a benchmark of Havering's proposed licence fees against a sample of Council's both within and outside of London.

Local Authority	Selective licensing fee	Additional HMO fee
Newham	£750	£1,250
Wandsworth	£850	£1,450
Lambeth	£923	£1,560*
Hackney	£925	£1,400

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Southwark	£945	£1,365.10
Havering	£950	£1,400
Barking & Dagenham	£950	£1,400
Westminster	£995	£1,540
Middlesborough Council	£998	N/A
Leicester Council	£1,290	N/A

** Based on 3 lettings*

Table 15: Benchmarking of selective licence fees against other Councils

Havering's selective licensing fee is relatively in proportion to its additional HMO licence fee when compared with other London boroughs running both schemes. It is also important to note that newer schemes will tend to have a higher fee to account for inflationary cost increases.

The proposed fee structure for licence applications is attached at **Appendix 6.**

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15. Conclusion

Havering's proposed additional and selective licensing schemes represents a carefully considered and well-supported strategic approach designed to address persistent challenges within the private rented sector. With a strong foundation based on robust evidence and clear objectives, the schemes aims to tackle poor housing conditions and ineffective property management, , ultimately improving the lives of tenants and supporting community safety.

The council has adhered to statutory requirements, including undertaking a thorough and comprehensive consultation in line with the Housing Act 2004. This process involved engaging with a wide range of stakeholders, including landlords, tenants, community groups, and other relevant parties, to gather feedback and ensure that the scheme addresses local needs and concerns. The consultation process not only demonstrates compliance with legal obligations but also provided the opportunity for the council to consider representations received and make changes to its proposals, ensuring it is both fair and responsive to the community's needs.

The legal justification for the schemes is robust, with the proposals firmly grounded in national and local housing legislation. This provides a solid legal framework for the licensing process, ensuring that the council's actions will withstand scrutiny and deliver meaningful benefits for local communities. The clear legislative backing enhances confidence in the schemes, offering clarity for landlords, tenants, and the wider community about the standards and expectations set.

By requiring landlords in designated areas to obtain a licence, the schemes will create a clear framework of accountability for property maintenance and tenant welfare. This will directly contribute to improved housing standards, reduce the risk of tenant exploitation, and foster safer, more cohesive communities.

In conclusion, the evidence shows that the proposed additional and selective licensing schemes area well-justified measure that will provide significant benefits for the residents of Havering. The schemes form a vital part of the council's strategic approach to deliver long-term improvements in housing quality, social cohesion, and regeneration, ensuring that the borough's future is marked by an improved quality of life for all.

16. Appendices

Appendices	Document
Appendix 1	Housing stock and stressors report (Metastreet, 2025)
Appendix 2	Consultation Report, 2025
Appendix 3	Council response to comments received during public consultation
Appendix 4	Selective Licence Conditions
Appendix 5	Additional Licence Conditions
Appendix 6	Schedule of Fees, Charges and Discounts

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Promoting good private sector housing for local people

Report on Havering Council's consultation on additional HMO and selective licensing proposals

September 2025

CADENCE INNOVA

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1. Executive Summary

Havering Council is committed to improving the standard of privately rented property in the borough and creating a fair environment for both tenants and responsible landlords, targeting rogue operators and those letting unsuitable properties, driving up standards to the benefit of all.

In order to build on the achievements of its current additional (HMO) and selective licensing schemes, the Council is proposing to introduce two new schemes when the current schemes expire on 24 January 2026.

A selective licensing scheme is proposed for all privately rented homes (excluding HMOs) within seven out of 20 wards to address the prevalence of poor housing conditions.

These wards include:

- Beam Park
- Harold Wood
- Rainham & Wennington
- Rush Green & Crowlands
- Squirrels Heath
- St Albans
- St Edwards

It is a requirement of the scheme that all properties in the designated areas that are rented to a single household (e.g., a family) or two unrelated sharers (e.g., two friends living together) will need to have a licence to be legally let. The scheme can be approved by Council's Cabinet and could be implemented in early 2026.

An additional HMO licensing scheme is also proposed in all wards of the borough. This would apply to all HMOs except those that already require a mandatory HMO licence and will help to drive up standards and ensure safer and better managed HMO accommodation. This scheme would be implemented concurrently with the selective licensing scheme. Additional HMO licensing can also be approved by the Council's Cabinet and could be implemented in early 2026.

When proposing to introduce discretionary property licensing schemes, the Housing Act 2004 requires councils to take reasonable steps to consult with all persons likely to be affected by the proposed designation(s). Havering Council commissioned Cadence Innova, an independent consultancy, specialising in collaborating with local authorities, to deliver public consultations to undertake an extensive programme of consultation activities and report independently on the findings.

To help inform all stakeholders, a consultation evidence pack was developed by Cadence Innova in conjunction with Havering Council, and this, along with other relevant documents, was available for the duration of the consultation on the council's website. The Council also had a dedicated phoneline and email inbox specifically to receive comments and submissions and to communicate with stakeholders for the duration of the consultation.

The consultation ran for 12 weeks from 14 April 2025 until 6 July 2025 and utilised a variety of methods to reach and seek opinions from all those likely to be affected by the Council's proposals, both within and outside the borough. These methods included an online survey, two virtual public meetings with landlords, tenants, residents, and landlord groups, and 135 stakeholders were directly contacted and asked for their response to the consultation. Stakeholders included local councillors, voluntary community sector organisations, tenants and resident associations, housing charities,

emergency service commanders, neighbouring boroughs and all London borough councils. The council advertised the consultation through digital and print media, as well as in-person methods.

A total of 403 survey responses was received. The survey incorporated a quantitative approach and qualitative responses through free text boxes. Qualitative feedback outside of the survey was also received at two virtual public meetings (attended by 143 people in total) and from 31 written responses from interested parties.

The consultation looked at the level of support for introducing an additional HMO and a selective licensing scheme.

The consultation also sought views on:

- the proposed licence conditions
- associated fees
- potential discounts
- scheme objectives
- perceptions of the issues of poor property conditions
- anti-social behaviour (ASB) in the borough.

In addition, the consultation garnered views on issues within the HMO tenure, including:

- management and maintenance
- health and safety
- overcrowding
- noise, nuisance and other ASB
- landlords' responsibilities.

The results of the consultation survey and the views of stakeholders gathered during the consultation are analysed fully in this report.

1.1 Key Findings

The following analysis is based on definitive responses. Where a set of responses totals less than 100 per cent, the remaining proportion of respondents answered, 'neither agree nor disagree' or 'don't know'.

Selective Overall		Landlords, letting or managing agents	Residents (including private tenants) and businesses	Other stakeholders
Total consultation survey responses	**403 responses**	174 responses	220 responses	9 responses

Total responses to the question	**403 responses**	174 responses	220 responses	9 responses
Agree with selective licensing proposal	**41%**	10%	63%	78%
Disagree with selective licensing proposal	**47%**	75%	27%	11%

Total responses to the question	**403 responses**	174 responses	220 responses	9 responses
Agree with proposed selective licensing conditions	**44%**	12%	67%	6 7%
Disagree with proposed selective licensing conditions	**38%**	62%	20%	0%

Total responses to the question	**403 responses**	174 responses	220 responses	9 responses
Selective licensing fee is about right	**21%**	4%	33%	44%
Selective licensing fee is too low	**18%**	0%	32%	11%
Selective licensing fee is too high	**52%**	93%	20%	22%

Additional HMO Overall		Landlords, letting or managing agents	Residents (including private tenants) and business	Other stakeholders
Total consultation survey responses	**403 responses**	174 responses	220 responses	9 responses

Total responses to the question	**403 responses**	174 responses	220 responses	9 responses
Agree with additional HMO licensing proposal	**59%**	45%	69%	89%
Disagree with additional HMO licensing proposal	**31%**	36%	28%	0%

Total responses to the question	**403 responses**	174 responses	220 responses	9 responses
Agree with proposed additional HMO licensing conditions	**47%**	24%	65%	78%
Disagree with proposed additional HMO licensing conditions	**26%**	32%	21%	0%

Total responses to the question	**403 responses**	174 responses	220 responses	9 responses
Additional HMO licensing fee is about right	**21%**	10%	29%	56%
Additional HMO licensing fee is too low	**22%**	4%	36%	11%
Additional HMO licensing fee is too high	**45%**	76%	21%	11%

Scheme Objectives		Landlords, letting or managing agents	Residents (including private tenants) and business	Other stakeholders
Total consultation survey responses	**403 responses**	174 responses	220 responses	9 responses

Total responses to the question	**403 responses**	174 responses	220 responses	9 responses
Agree with scheme objectives	**43%**	15%	64%	67%
Disagree with scheme objectives	**37%**	60%	20%	22%

1.2 Conclusions

Alongside the quantitative data from the online survey, respondents had the opportunity to express their views in free-text form in response to several questions. Therefore, the aggregate online analysis offers only a partial view. The survey data, along with the free-form text responses, virtual public meetings, and other written representation received provide vital insights.

It must also be noted that for some questions, the proportion of responses classified as 'neither agree or disagree' and 'don't know' is, in a few cases, substantial (up to 42%); though generally between 10% and 20%. This uncertainty or neutrality among respondents suggests that many may not have strong opinions or find the issues complex. In the case that respondents were unsure about any aspect of the proposed schemes or consultation, the Council invited questions and comments through a dedicated phone line, email inbox and two public forums.

A major finding was the stark contrast in views about the proposals among different stakeholder groups. While residents (including private tenants) and business and other stakeholders generally support the Council's proposals, landlords, lettings and managing agents, and their representative bodies, were generally opposed.

The aggregate online survey data does not show overall support for the Council's selective licensing proposal although there is greater support for the proposed additional HMO scheme. Nevertheless, views expressed in the free-text responses ranged from positivity that the Council is actively tackling issues prevalent in the private rented sector (PRS) such as poor housing conditions, ASB and overcrowding, to concerns that the schemes were unnecessary, burdensome, a way for the Council to generate revenue and the cost of the licence fee would be passed on to tenants.

A significant number of the attendees at the public online forums were landlords and managing/letting agents who held strong views and were negative to property licensing schemes in general. In particular, they perceived unfairness of the scheme in targeting good landlords and were

concerned about the effectiveness of property licensing schemes and the Council's own ability to achieve its objectives. The main objections, however, were to the economic costs of licensing schemes on landlords, which they felt would inevitably be passed onto tenants.

The Council received a number of written responses from various stakeholders, both supporting and opposing the council's proposals. Another borough Council was also supportive, recognising the challenges in the PRS and expressed the positive outcomes from implementing their own property licensing schemes. In contrast, landlord representative organisations such as the NRLA, Safeagent and Propertymark objected to the proposals. They argued that the council should utilise existing enforcement powers to address issues in the PRS.

2. Introduction

2.1 Background

Between 14 April and 6 July 2025, Havering Council consulted on new licensing proposals for the PRS in the borough. Property licensing is a way of ensuring safer and better standards in private rented properties.

Havering is consistent with the rest of London in that it has a shortage of affordable housing, with house prices remaining out of reach for many. The demand for social housing far outstrips the supply. As a result, private rented property is increasingly becoming the only viable option for many Havering residents, including those who are vulnerable and on low incomes. Currently, 19.3% of Havering's housing stock is in the PRS, and this is expected to continue to rise in the future.

While the majority of properties in the PRS are well maintained and safe, there is a growing number of properties that are substandard and potentially dangerous. Even landlords with good intentions may not always be aware of the latest legal and safety requirements. These properties pose a risk to the health, safety, and wellbeing of tenants, cause issues with neighbours, and require numerous interventions from council teams that are already under pressure. It is crucial for the Council to utilise all available tools to improve the situation for tenants renting properties in this sector. Licensing plays a key role in this effort.

2.2 Proposals

The Council is proposing to introduce a selective licensing scheme for all privately rented homes (excluding HMOs) within seven out of 20 wards to address the prevalence of poor housing conditions.

These wards include:

- Beam Park
- Harold Wood
- Rainham & Wennington
- Rush Green & Crowlands
- Squirrels Heath
- St Albans and St Edwards.

It is a requirement of the scheme that all properties in the designated areas that are rented to a single household (e.g., a family) or two unrelated sharers (e.g., two friends living together) will need to have a licence to be legally let. The scheme can be approved by Council's Cabinet and could be implemented in early 2026 when the current scheme expires.

An additional HMO licensing scheme is also proposed in all wards of the borough. This would apply to all HMOs except those that already require a mandatory HMO licence and will help to drive up standards and ensure safer and better managed HMO accommodation. This scheme would be

implemented concurrently with the selective scheme. Additional HMO licensing can also be approved by the Council's Cabinet and could be implemented in early 2026 when the current scheme expires.

2.3 Public consultation

The consultation ran for 12 weeks from 14 April until 6 July. In order to gather as much feedback as possible from landlords, tenants, residents and other stakeholders, the Council used several strategies to promote the consultation.

The consultation focused on the extent to which respondents agree or disagree with the Council's proposal to introduce the additional HMO licensing and selective licensing schemes.

The consultation also looked at views on:

- the proposed licence conditions
- associated fees
- proposed discounts
- scheme objectives
- the respondents' perceptions of ASB
- poor property conditions
- other issues in the PRS in the borough.

Working alongside Cadence Innova, an independent consulting firm, specialising in collaborating with local authorities to deliver public consultations, the Council launched a comprehensive communications and marketing campaign to inform all stakeholders about the Council's ongoing consultation on the proposed introduction of selective licensing and additional HMO licensing schemes, with the aim of encouraging active participation.

The communications strategy was designed to inform and educate all stakeholders about the proposed licensing scheme and its potential benefits. The marketing approach was primarily focused on digital activities and online events. However, to meet the needs of the digitally excluded, physical hard copy communications were also made available.

Communications channels

- The Council used a wide range of communication channels to promote the consultation and make stakeholders aware of the proposals.
- The council undertook various activities to engage all stakeholder groups, both within and outside the borough, and to raise their awareness about the consultation. These activities included:
- Updating the council website homepage with a news article and a link to the consultation on 14 April and 4 July 2025
- A press release to announce the start of the consultation was published on 14 April 2025
- A press release to announce the consultation would soon close was published on 4 July 2025
- The press release was linked to relevant housing web pages
- Approximately 300 leaflets were distributed at food banks and children centres
- A direct email was sent to 16 faith groups

- A direct email was sent to key stakeholders including all London councils, neighbouring borough councils, landlord accreditation and membership organisations, housing charities, emergency service commanders and integrated care boards on 24 June 2025.

Using the council's social media

- 10 Facebook posts with a total of 9,738 views, , 6,999 people reached, 23 likes, 22 clicks, 2 saves and 7 shares
- 20 X (formerly known as Twitter) posts with a total of 1,516 impressions, 4 likes and 2 reshares

Activities to reach out to Havering tenants and residents included:

- News about the consultation was added in Havering newsletter, Live Well Havering on 8 May 2025 to 2,200 subscribers
- News about the consultation was included in Havering newsletter, At the Heart on 25 May 2025 to 13,275 subscribers
- News about the consultation was included in Havering newsletter, Living in Havering on 20 June 2025 to approximately 65,476 subscribers
- News about the consultation was included in Havering newsletter, Living in Havering on 4 July 2025 too approximately 65,476 subscribers
- Updating the Have your say section on:
    - 18 April 2025
    - 25 April 2025
    - 2 May 2025
    - 16 May 2025
    - 20 June 2025

- Leaflets and posters were displayed at:
    - Collier Row Children's Centre
    - Elm Park Children's Centre
    - Ingrebourne Children's Centre
    - Rainham Village Children's Centre
    - St Kilda Children's Centre
    - Acorn Specialist Children's Centre
    - Avelon Road Centre
    - Yew Tree Resource Centre

Activities to reach out to landlords included three direct emails to known landlords and agents operating in the Havering. The details are:

- 3,388 on 9 May 2025
- 3,388 on 9 June 2025

- 3,688 on 11 June 2025
- An out of home campaign added to 18 bus routes leaving Romford Bus Garage

Activities to reach out to landlords outside the borough included:

An out of home campaign with adverts added to Global, Clear Channel and JC Decaux media sites ran from 9 to 22 June 2025. The sites were in the following neighbouring boroughs:

- 4 sites in Bexley
- 6 sites in Barking & Dagenham
- 4 sites in Epping
- 2 sites in Brentwood
- 3 sites in Thurrock
- 24 bus routes leaving Dartford Bus Garage

In addition, the Chief Executives of the of the following organisations were written to directly:

- National Residential Landlords Association (NRLA)
- British Landlords Association (BLA)
- iHowz
- Safeagent
- UK Association of Letting Agents.

The Accreditation Officer at the London Landlord Accreditation Scheme (LLAS) was also directly contacted.

The following organisations were included on the press release distribution list:

- NRLA
- Arla Propertymark
- Safeagents
- LLAS
- iHowz
- Letting Agent Today
- London Property Licensing website
- BLA
- Guild of Letting & Management

A digital campaign with the London Property Licensing (LPL) ran between 17 April and 6 July 2025. LPL is the award winning, leading website for informing private landlords in the UK. It is the only website dedicated to providing simple, impartial and expert advice on property licensing and explaining the licensing requirements across every London borough. The website reaches out to landlords based throughout the UK and those based abroad. Since launching in April 2015, the website has received more than 2 million views. The Havering campaign included:

- From 24 April to 6 July 20-25, a rotating banner headline at the top of the LPL home page. The banner headline had a hyperlink to the LPL Havering property licensing consultation webpage
- A pixel banner advert promoting the licensing consultation was placed on the LPL homepage, Havering borough page.

- Anyone clicking on the advert was taken directly to the council's consultation webpage
- On 17 April 2025, the LPL Havering webpage was updated with information about the licensing consultation and a direct link to the council's consultation webpage in the orange 'At a Glance box' to encourage people to find out more and take part in the consultation. This is an additional feature added during the promotional period.
- From 24 April 2025 to 6 July 2025, a licensing consultation listing was displayed on the LPL website and promoted on the home page, the licensing consultations page and Havering borough page. The listing summarised the purpose of the consultation and explained how to take part. The consultation webpage promoted the online consultation events that took place on 14 May and 18 June 2025
- A news article about the consultation was published on 22 April 2025 and promoted via social media and the LPL newsletter.
- The Havering consultation was promoted in newsletters distributed on 30 April and 5 June 2025. The newsletter is widely distributed to landlords, letting agents, organisations, local authority officers and government officials and sent to more than 3,700 people who have requested updates on housing regulation and property licensing schemes in London.
- The LPL LinkedIn page and LPL Facebook page carried news of the consultation on 29 April 2025
- Posts about the licensing consultation were published on the LPL X (formerly known as Twitter) feed (@lplicensing) every 15 to 17 days, timed to cover a variety of morning, afternoon and evening posts throughout the consultation period. During this period the @lplicensing X feed had more than 2,300 followers, generating impressions, likes, reposts and comments.

A programmatic digital campaign ran from 19 May to 8 June 2025. Digital adverts were placed using Google Display advertising and social media channels. The adverts were strategically placed to engage with the following stakeholders:

- Landlords
- Tenants
- Parents.

This was achieved by:

- targeting people who have searched for landlord insurance, legislation, guidance and property letting on the Google advertising platform
- targeting people with an interest in property development across news and social platforms.

Analytics from the campaign are summarised below:

689,646 impressions, 2,591 clicks, 4,401 interactions, 237,007 maximum reached.

Direct emails were sent to all of the Leader's offices, Chief Executives, Regulatory and Housing services at all boroughs across London on 24 June 2025.

Activities to make digitally excluded and vulnerable stakeholders aware of the consultation included:

Posters and leaflets were sent to the following foodbanks

- Collier Row and Romford
- Harold Hill
- Rainham

Paper copies of the consultation were available at the following locations within the borough from 14 April 2025:

- Collier Row Library
- Elm Park Library
- Gidea Park Library
- Harold Hill Library
- Harold Wood Library
- Hornchurch Library
- Rainham Library
- Romford Library
- South Hornchurch Library
- Upminster Library.

Reaching out to local community and outreach groups to ask them to share the consultation with the groups they interact with via the Live Well Havering Network and sharing with the following organisations:

- Collier Row Children's Centre
- Elm Park Children's Centre
- Ingrebourne Children's Centre
- Rainham Village Children's Centre
- St Kilda Children's Centre
- Acorn Specialist Children's Centre
- Avelon Road Centre
- Yew Tree Resource Centre
- Collier Row and Romford Foodbank
- Harold Hill Foodbank
- Rainham Foodbank

The following organisations were included on the press release distribution list:

- Generation Rent
- Justice for Tenants
- Flat Justice
- Cambridge House
- Age UK Redbridge, Barking & Havering
- Reform
- Crisis
- Forward Trust
- Shelter
- Renters Rights London
- Refugee Council
- Central YMCA
- Citizens Advice Havering

Activities to make stakeholders within the Council aware of the consultation included:

- Updating the Council website corporate homepage carousel to include the consultation
- Posting a news article about the consultation on the Council website during the first week of the consultation and again 11 weeks into consultation
- A notice was placed on the internal newsletter, Global Newsletter edition,

Using the council's social media:

- 10 Facebook posts with a total of 9,738 views, 6,999 people reached, 23 likes, 22 clicks, 2 saves and 7 shares
- 20 X (formerly known as Twitter) posts with a total of 1,516 impressions, 4 likes and 2 reshares

2.4 Consultation methods

The Council used several methods to gather feedback from stakeholders about the Council's proposals.

Online survey

An online survey was open to the general public. Respondents could also request a paper version of the survey. A total of 403 survey responses was received. The consultation survey was the main method of gathering feedback during the consultation. Respondents were asked their views on selective and additional HMO licensing, the proposed fees, discounts, licence conditions, scheme objectives and their views on issues within the borough. Their responses are analysed and broken down by stakeholder type below. A copy of the survey questionnaire can be found in Appendix 3.

Public forums

The Council held two virtual public forums to provide more information about the proposed scheme and to gather feedback from landlords, residents and other stakeholders who would be impacted by licensing. The public meetings were held over Microsoft Teams and were facilitated by Cadence

Innova. This included a presentation of the Council's proposals followed by a question-and-answer session with Council officers. These events are summarised below:

- Virtual public forum 1, 14 May 2025
- Virtual public forum 2, 18 June 2025

The above meetings were widely publicised. 48 people registered for the first event with 41 actual attendees. 142 people registered for the second event with 102 actual attendees.

Other written feedback

The Council accepted feedback on the proposed licensing schemes by email or written response. The feedback in the emails received and written responses has been analysed below. The Council received 31 email responses regarding the consultation. Three written responses were received from stakeholder organisations and can be found in full at Appendix 4.

A letter of support for the scheme was also received from another borough council, which can be found in full in Appendix 5.

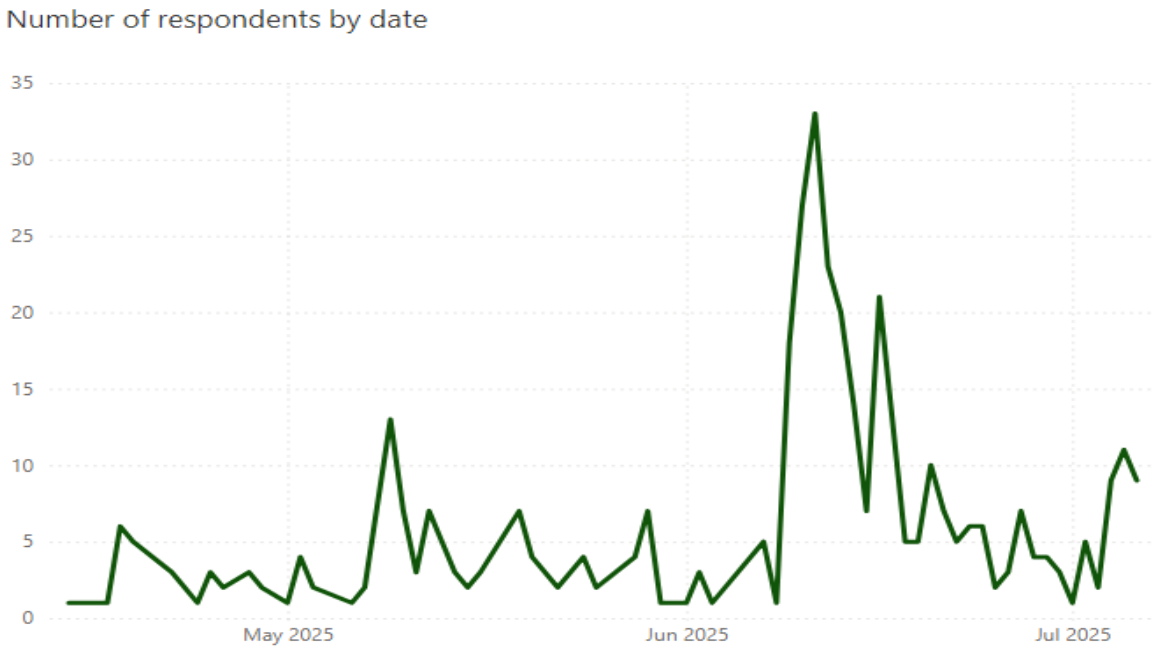
3. Consultation survey results

This section of the report presents the results from the consultation survey. There were **403** responses to the consultation survey.

In the following analysis, the percentages are based on the answers to the question and will state where fewer than the total 403 respondents answered the question.

3.1 Overall consultation response

The consultation ran from **14 April to 6 July 2025**, during which time, different stakeholder groups were engaged in myriad ways. The timeline of responses is shown below:

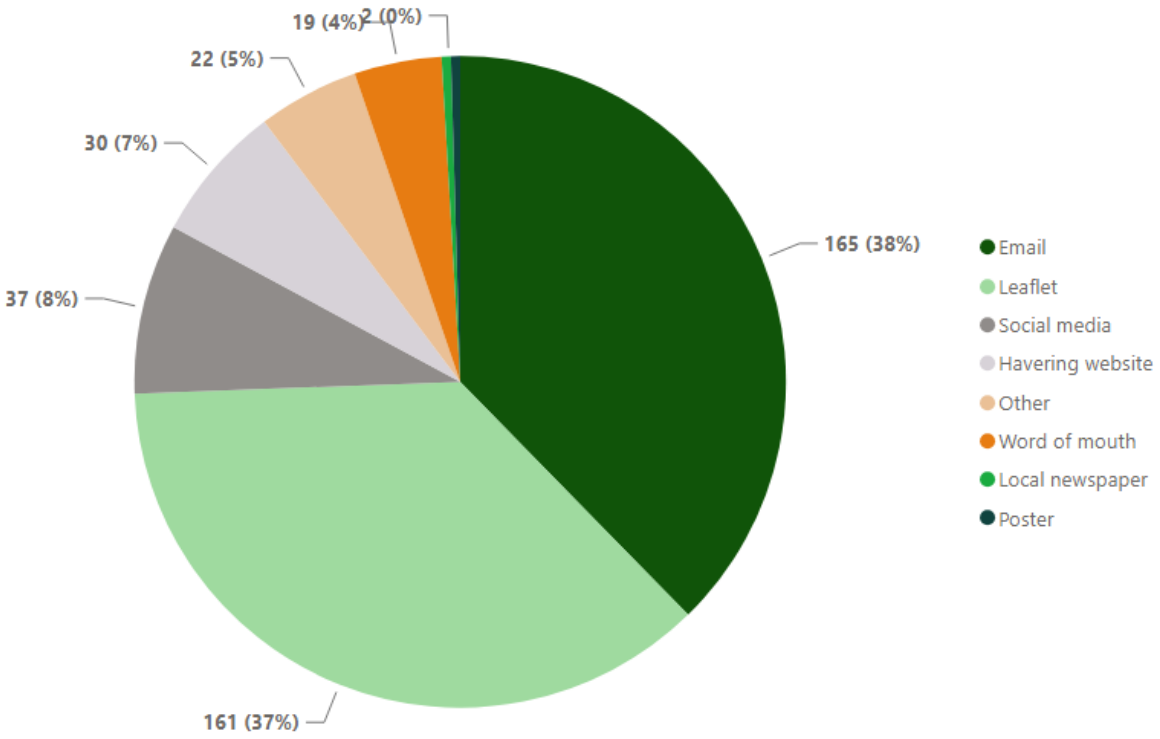


Respondents could optionally give information on the first part of their postcode, allowing for geographic analysis of responses. Of the **399** respondents who provided this information, the vast majority were Havering/London residents, though some responses came from further afield:



Respondents were also asked to give information about how they heard about the consultation. All **403** respondents answered this question, though more than one choice of answer was permitted, giving a larger total number of responses (**438**). An almost equal proportion of the responses listed email (**38** per cent of all responses from **41** per cent of respondents) or leaflet (**37** per cent of all responses from **40** per cent of respondents) as a channel by which respondents found the consultation. Another **8** per cent of responses (from **9** per cent of respondents) listed social media and **7** per cent of all responses (from **7** per cent of respondents) listed the Havering website. The remaining **10** per cent of all responses (from **11** per cent of respondents) listed other channels such as word of mouth, posters and local newspapers.

How did you hear about this consultation? (*More than one choice of answer permitted*)

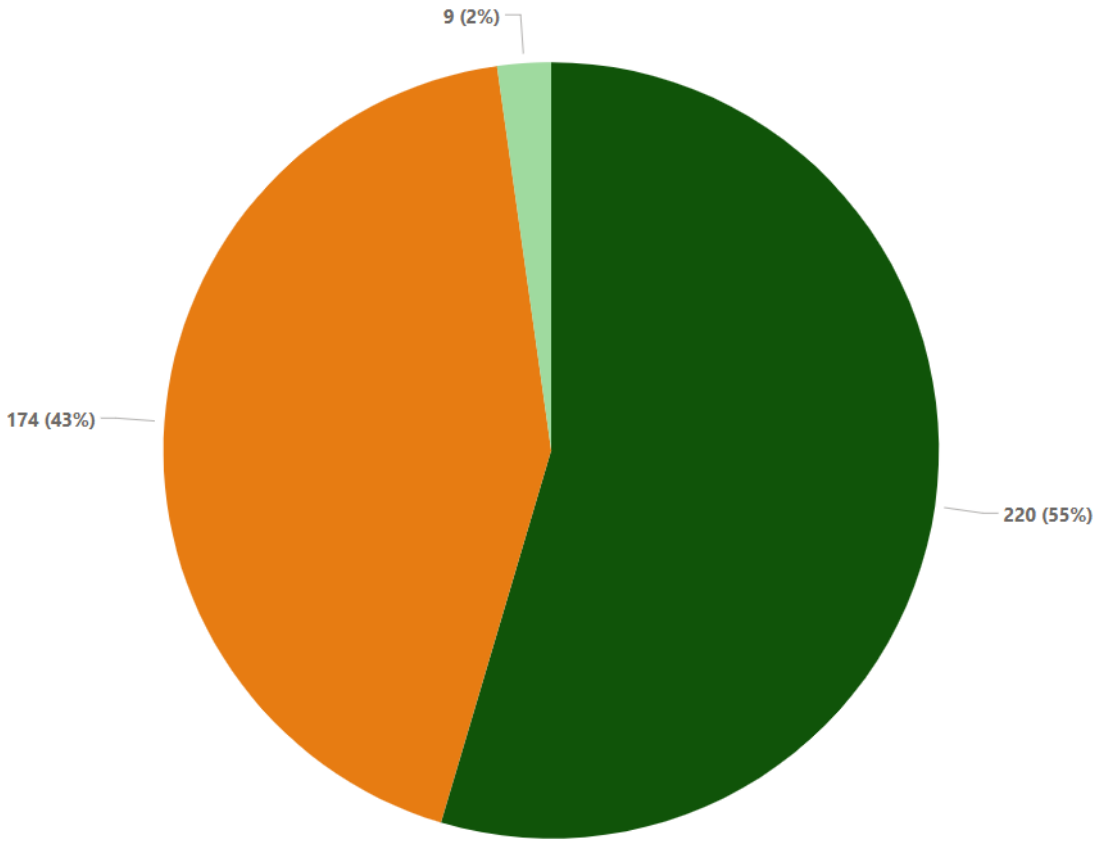


3.2 Stakeholders

All respondents to the consultation were categorised into the following stakeholder groups:

In what capacity are you responding to this survey?

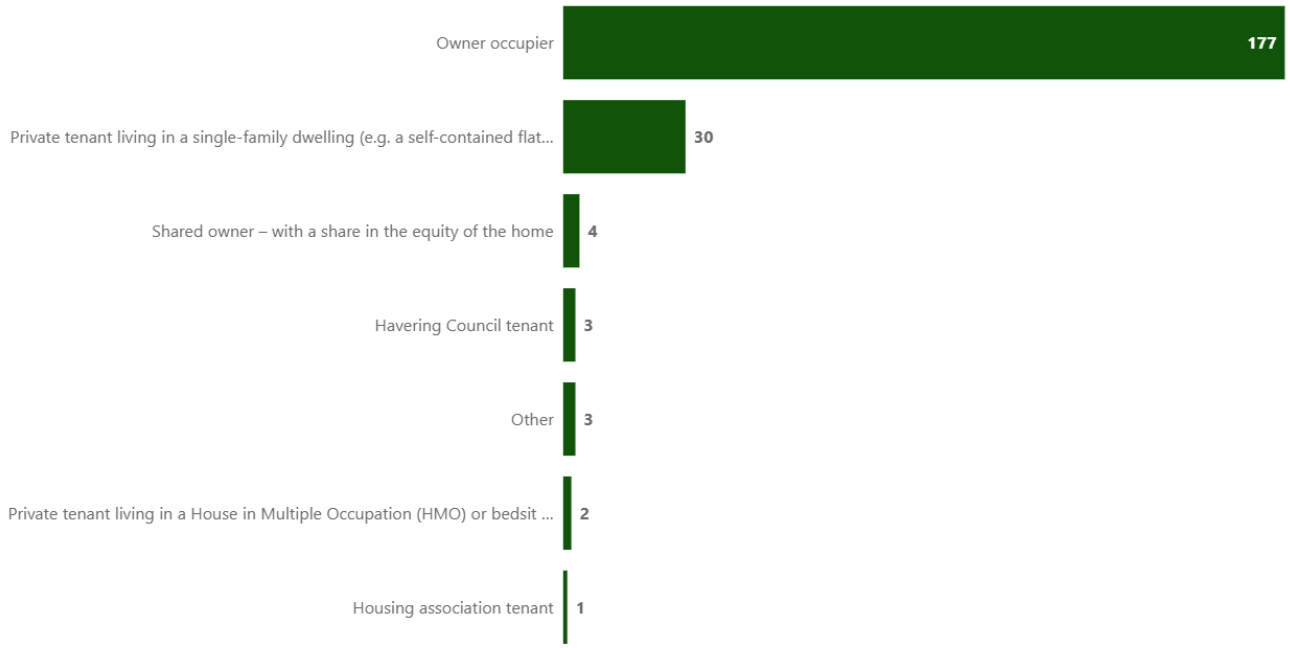
- As a Havering resident or local business (but not a landlord)
- As a landlord, letting or managing agent with properties in Havering
- As another type of stakeholder



Respondents who stated they were a Havering resident or local business, or a landlord, letting or managing agent were then asked which description would best describe them.

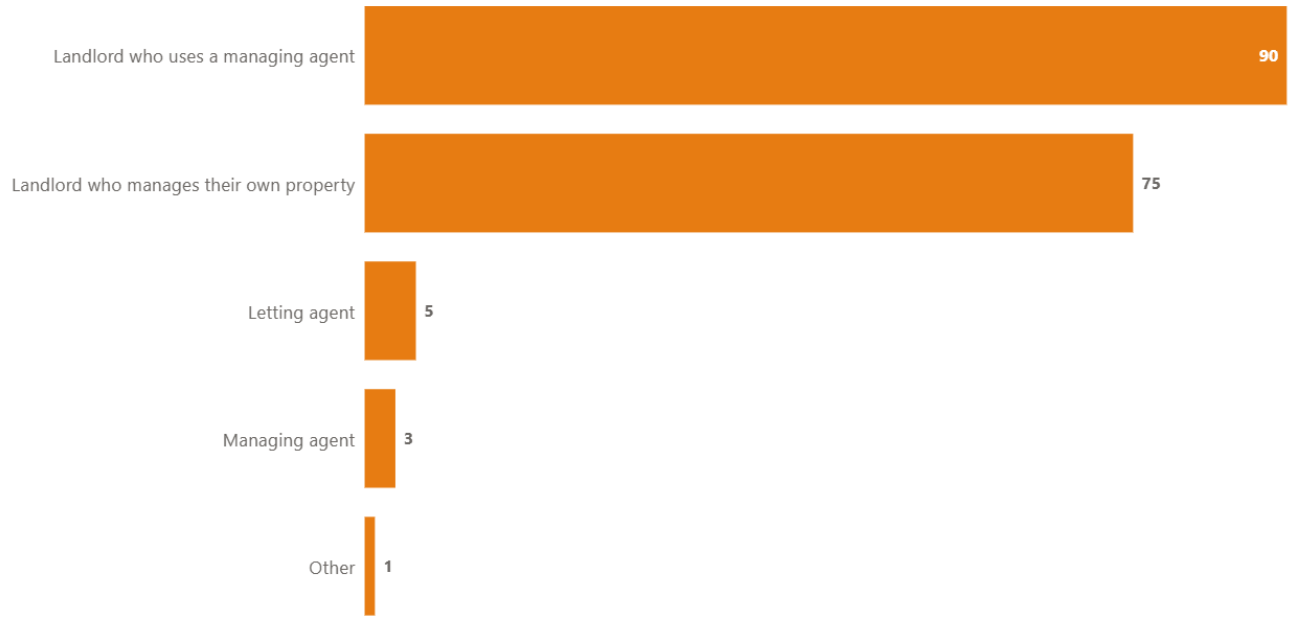
Of the **220** residents and local businesses who responded to this question, **181** (**82** per cent) said they were an owner occupier or shared owner, **32 (15** per cent**)** said they were private tenants and **7** (**3** per cent) said they were another type of resident or local business.

If you are a resident living in Havering, or responding on behalf of a local business in Havering, which of the following best describes you?



Of the **174** landlords, letting or managing agents who responded to this question, **90** (**52** per cent) said they were a landlord who uses a managing agent, and **75** (**43** per cent) said they were a landlord who manages their own property.

If you are a landlord with properties in Havering, which of the following best describes you?



The **9** respondents who classified themselves as 'Another Type of Stakeholder' came from a range, including:

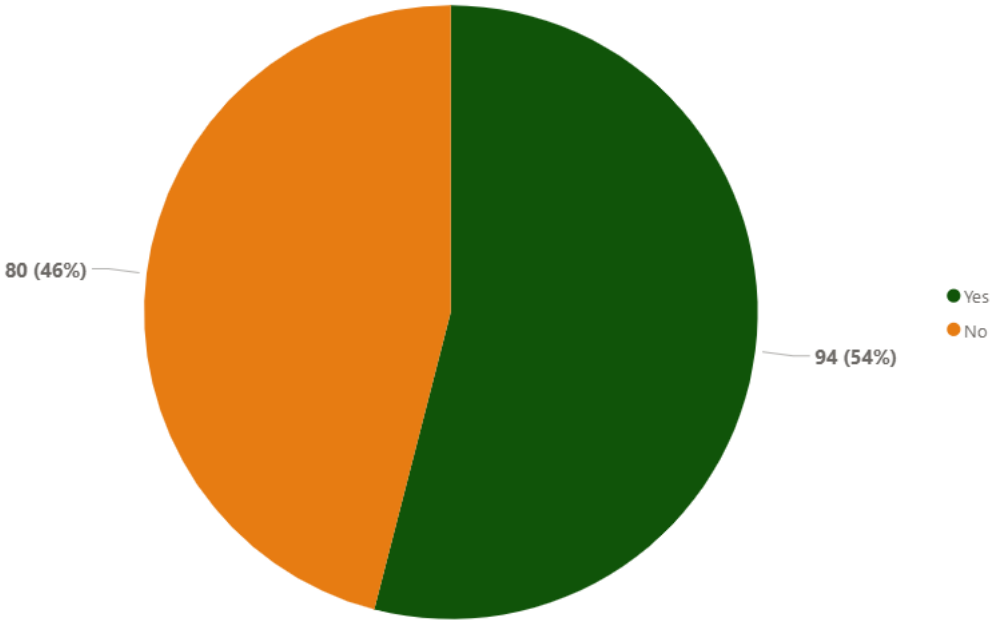
- A councillor representing the views of the people from a local ward in Havering
- A Private Renters' group covering Havering and other London boroughs
- A residents' group from Romford

The range of respondents to the consultation shows a good representation of views from different stakeholder groups.

Landlords' relationship to Havering

Landlords, letting or managing agents who responded to the consultation were asked if they lived in the London Borough of Havering. Of the **174** landlords, letting or managing agents who responded to this question, **94 (54** per cent**)** said they lived in Havering, and **80 (46** per cent**)** said they lived outside of Havering.

Do you live in Havering? *(Landlords & letting/managing agents)*



These results clearly indicate that the consultation reached landlords both within and outside the borough.

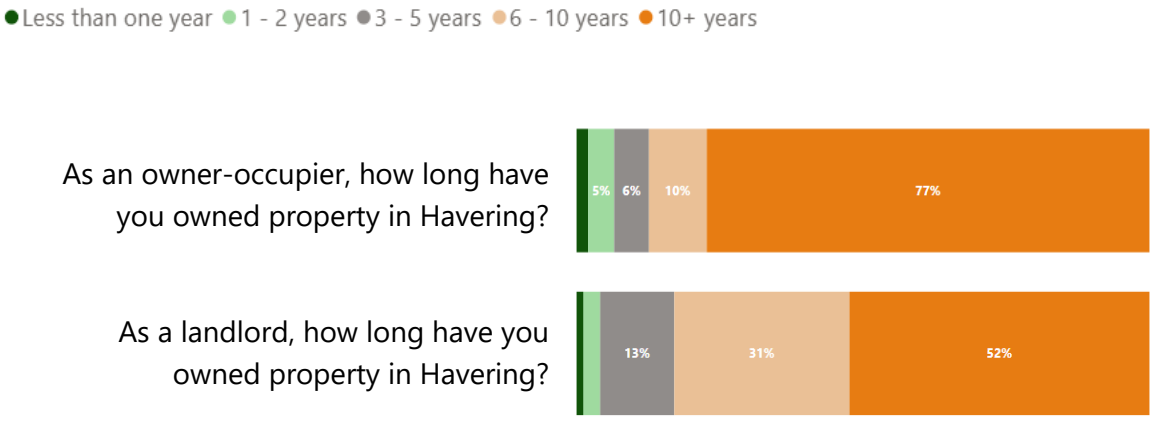
Types of property and length of ownership

Landlords, letting or managing agents were also asked about the types of properties they owned, and how long they had owned them. More landlords owned self-contained, purpose-built flats than other types of properties. The majority of landlords owned only one or a small number of properties and had done so for more than 10 years. However, a larger proportion of owner-occupiers than landlords had owned their properties for over 10 years.

Please indicate how many properties you own/manage in Havering, for each of the following types: *(Landlords/letting agents)*



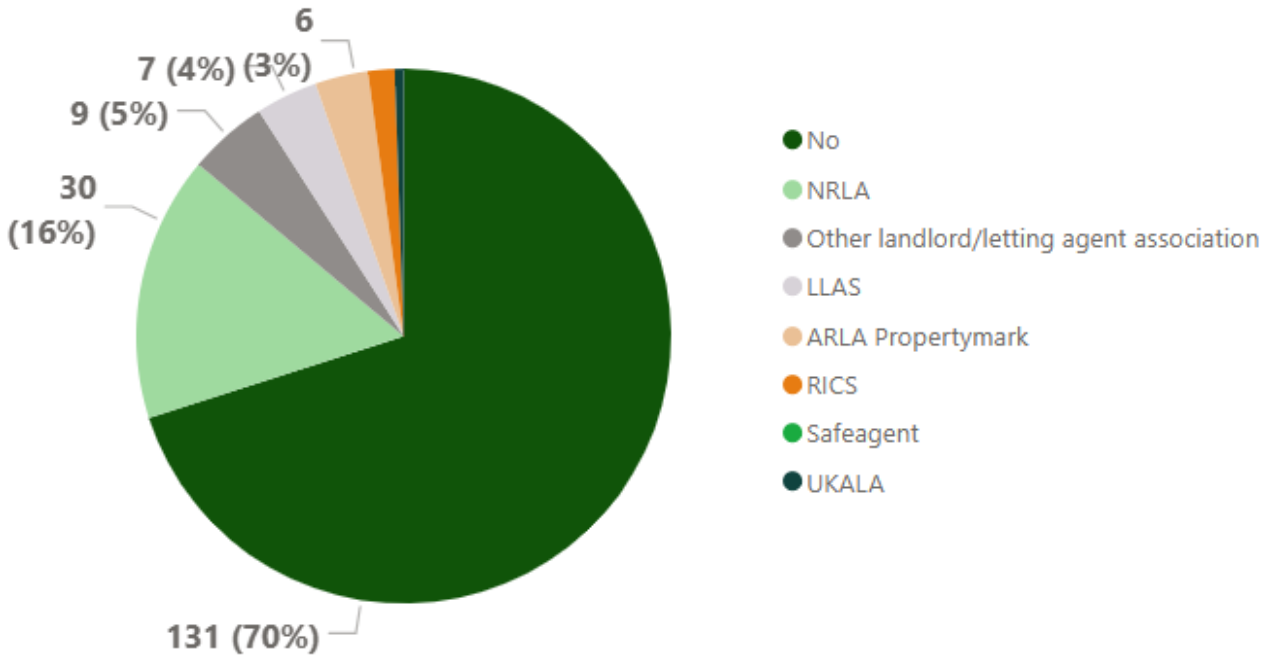
How long have you owned property in Havering? *(Owner-occupiers & Landlords/letting agents)*



Accreditation

Landlords, letting or managing agents were additionally asked whether they belonged to any accredited landlord schemes or were a member of any organisations. All landlords/letting agents (**174**) responded to this question but were allowed to indicate more than one option, giving a larger total number of responses (**187**). The majority of responses (**70** per cent of all responses from **75** per cent of respondents in this stakeholder group) indicated no accreditation with any of the listed schemes. The NRLA had the largest proportion of responses indicating membership (**16** per cent of all responses from **17** per cent of respondents in this stakeholder group).

Are you accredited or a member of any of the following organisations? *(Landlords/letting agents; more than one answer permitted)*



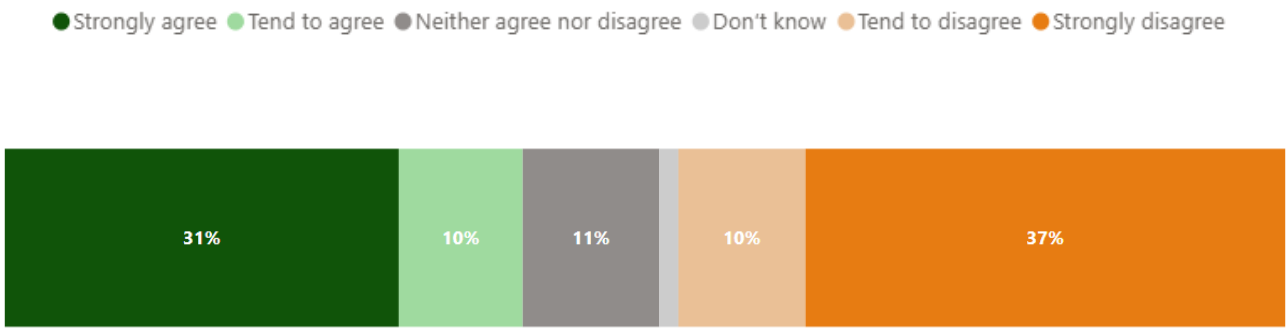
3.3 Views on the proposed selective licensing scheme

The Council is proposing to introduce one selective licensing designation which would apply to privately rented homes across the following seven wards based on the criteria of poor housing conditions:

- Beam Park
- Harold Wood
- Rainham & Wennington
- Rush Green & Crowlands
- Squirrels Heath
- St Albans
- St Edwards

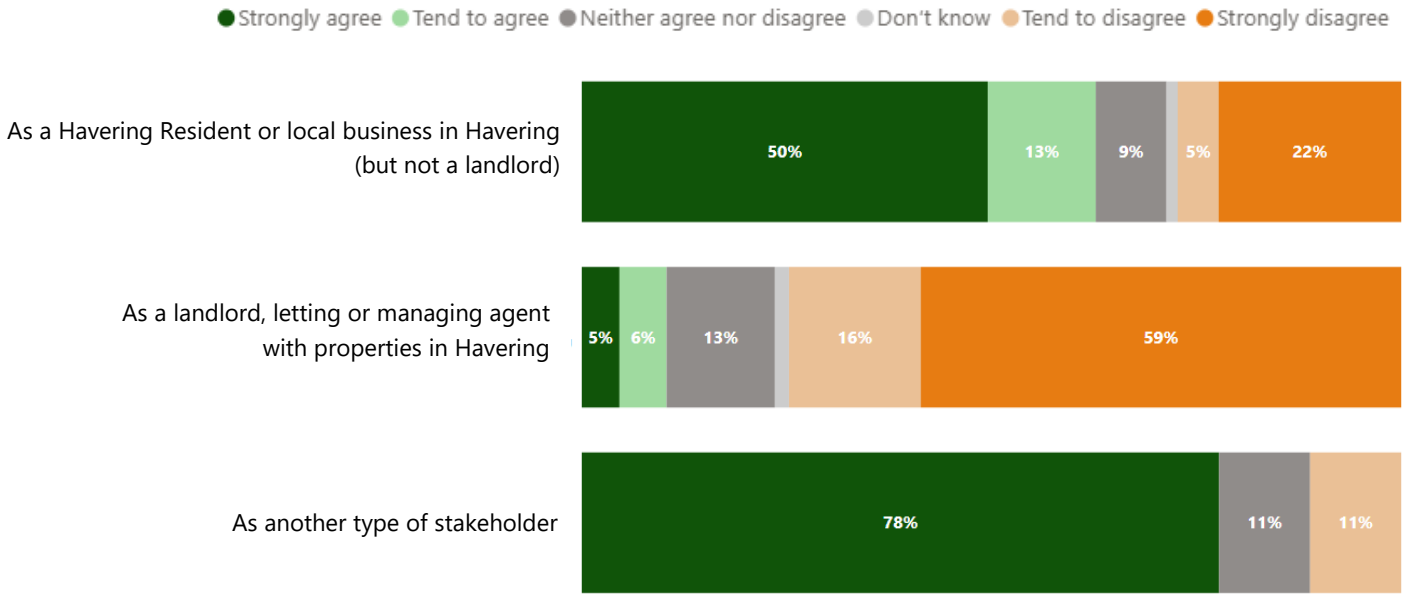
All **403** respondents answered this question. A minority, **41** per cent, agree with the proposal for selective licensing and **47** per cent disagree.

To what extent do you agree or disagree with the proposal for a selective licensing scheme in the seven wards?



Looking at the responses by group, landlords, letting and managing agents (*from 174 total responses*) are opposed to the proposal with approximately **75** per cent disagreeing. In contrast, other stakeholders are in favour of the proposal, with **63** per cent of residents or local businesses (*from 220 total responses*), and **78** per cent of other stakeholders (*from 9 total responses*) agreeing with the proposal.

To what extent do you agree or disagree with the proposal for a selective licensing scheme in the seven wards?

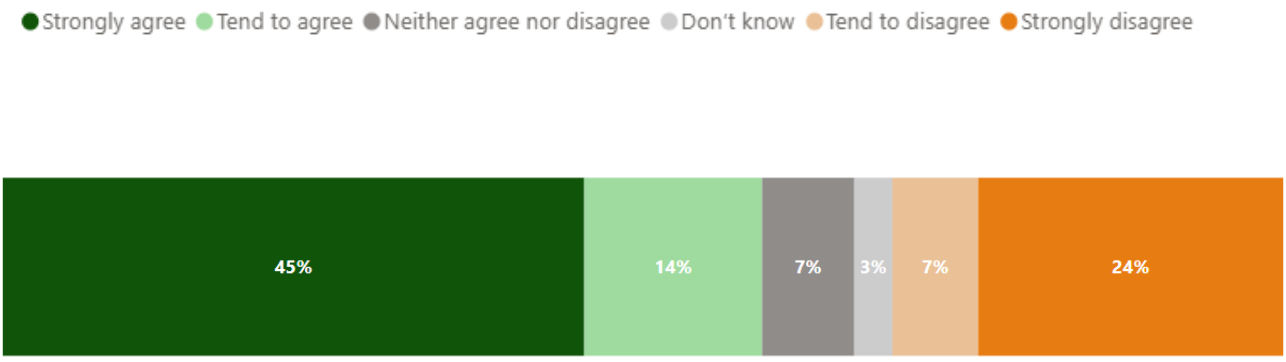


3.4 Views on the proposed additional HMO licensing scheme

The Council is proposing to introduce a borough-wide additional HMO licensing scheme. To understand the views on this proposal, respondents were asked about their opinions on this designation. This section covers the responses regarding the proposed additional HMO licensing scheme, which would apply to all smaller HMOs not currently subject to the mandatory HMO licensing scheme.

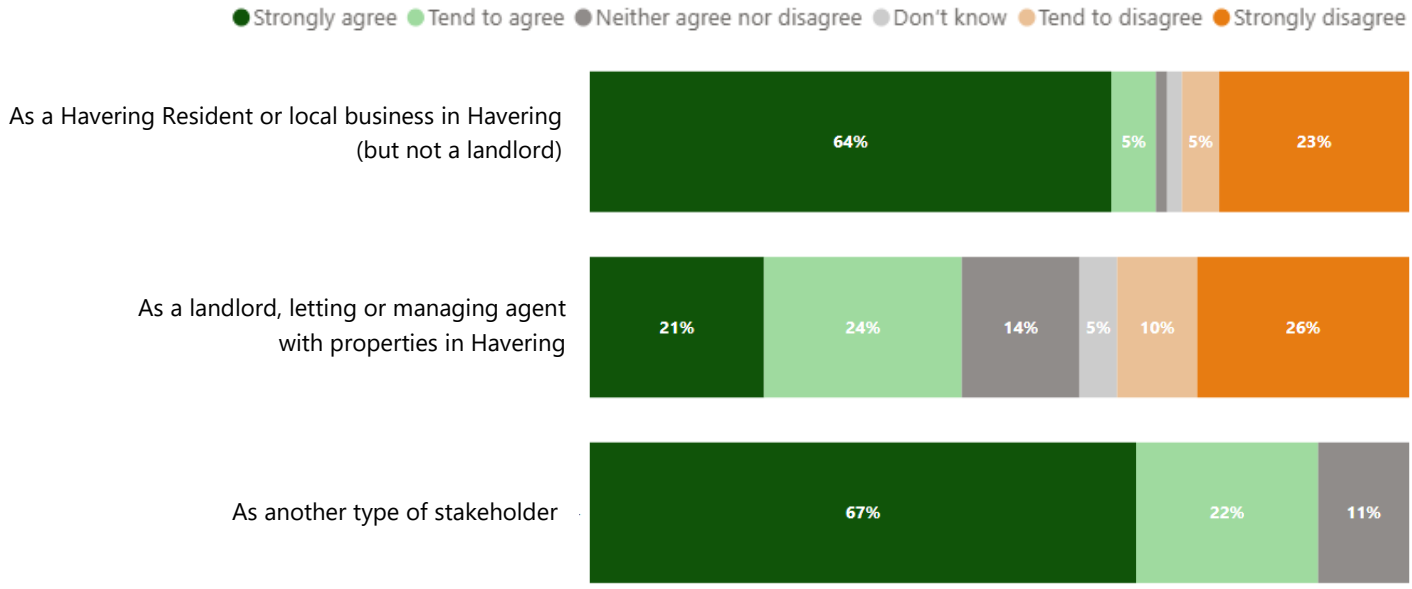
All 403 respondents who answered this question. A majority, **59** per cent of respondents, agree with the proposal for additional HMO licensing and **31** per cent disagree.

To what extent do you agree or disagree with the proposal for a borough-wide additional HMO licensing scheme?



Looking at the responses by group, all stakeholders are generally in favour of the proposal, with **69** per cent of residents or local businesses (*from 220 total responses*), **45** per cent of landlords, letting and managing agents (*from 174 total responses*), and **89** per cent of other stakeholders (*from 9 total responses*) agreeing.

To what extent do you agree or disagree with the proposal for a borough-wide additional HMO licensing scheme?



3.5 Free text comments on the proposed schemes (for those in disagreement)

The free text comments for the questions asking respondents to explain why they disagreed with the proposed licence schemes and if they had any further comments/considerations were analysed. The analysis looked at the responses by stakeholder type. As the 'other stakeholders' group was relatively small (at 9 respondents in total), this has not been looked at separately, but comments have been incorporated into the residents/local businesses group.

Landlords/agents

For landlords/agents, seven major themes can be drawn out from the responses:

1. *Opposition to the scheme(s) as a whole*: many landlords and agents expressed strong disagreement with the proposed selective and/or additional HMO licensing schemes, viewing them as unnecessary, burdensome, and a way for the Council to generate revenue. They argued that existing laws and regulations are sufficient to address any issues with the property conditions and that the scheme unfairly penalises responsible landlords and will fail to remedy problems with rogue landlords.

> *"The selective licencing is a money making scheme for the council."*

> *"This is a money making scheme… nobody benefits except the council."*

> *"Landlord licences are nothing but another tax… it makes the property no safer at all."*

> *"This sounds like a way the council is trying to make more money from landlords which I think is unfair to them."*

2. *Concerns about increased costs and rents:* many landlords and agents expressed concerns that the licensing scheme will lead to increased costs, which will ultimately be passed on to tenants in the form of higher rents. They argued that this will exacerbate the already difficult housing shortage and make it more difficult for tenants to afford rental properties.

> *"The proposed £950 per property licensing fee is excessive… this cost will almost certainly be passed on to tenants."*

> *"I just simply increase my rent to cover the cost of the licence which is worse for the tenant."*

3. Focus on targeting rogue landlords: landlords suggested that instead of implementing a blanket licensing scheme, the Council should focus on targeting and penalising rogue landlords who are not complying with existing regulations. They argued that this would be a more effective approach to improving property conditions and protecting tenants and not penalise landlords who already have properties that meet high standards.

> *"The scheme imposes significant costs and administrative obligations on compliant landlords, penalising the majority for the actions of a few."*

> *"Licensing schemes often penalise compliant landlords, while rogue landlords continue to operate under the radar."*

4. Utilise existing powers/legislation to target issues within the PRS: some landlords and agents expressed that the current powers the Council has to tackle problems with poor property conditions and ASB are sufficient.

> *"Let's be clear: you do not fix enforcement failures by creating more red tape. You fix them by using the powers you already have — powers that councils consistently fail to exercise effectively."*

> *"There is already a comprehensive legal framework in place… licensing merely duplicates existing legal requirements."*

> *"Selective licensing is duplicative and punitive."*

5. Lack of faith in effectiveness of schemes and Council management: some landlords and agents expressed scepticism about the Council's ability to effectively manage and enforce the licensing schemes. They cited examples of poor management of existing licensing schemes (both in Havering

and other boroughs) and lack of inspections as evidence that the scheme may not achieve its intended goals.

> *"Unless the council is willing to physically inspect every property, this scheme does not and will not make any difference."*

> *"I have seen NO improvement/impact from the current scheme, which seems to be an additional money making exercise from a cash strapped council that doesn't care about any of its residents"*

6. *Emphasis on the role of social housing:* several landlords highlighted the need for the Council to address issues with social housing, which they argued is often in poor condition and contributes to housing problems in the borough. They suggested that the Council should focus on improving its own housing stock before imposing additional regulations on private landlords

> *"You should worry about your own stock of social housing first and get those up to standard (and build thousands more) before picking on private landlords for non-HMO properties…If you built more social housing people would not need private rental so much."*

> *"The questions that you are applying to landlords should apply to housing associations who are failing to maintain their properties, deal with anti-social behaviour, repairs and overcrowded properties with no recourse."*

> *"Council should look to improve their standards first and lead by example. This just shows double standards."*

7. *Licensing will drive landlords out:* several landlords expressed their concern that the schemes would force them to sell, thus reducing housing supply and making life more difficult for tenants.

> *"Will now sell our 2 one-bedroom flats at the earliest opportunity due to Havering Council's ridiculous bureaucracy…"*

> *"This could contribute to the wider housing crisis by reducing the availability of rental properties."*

> *"Landlords are selling up because they are fed up with more restrictions."*

Residents/local businesses & other stakeholders

For residents/local businesses and other stakeholders, similar themes were evidenced, with a greater emphasis on increased costs for tenants:

1. Concerns about increased costs: many respondents expressed concerns that the proposed licensing scheme would lead to increased costs for landlords which would ultimately be passed on to tenants in the form of higher rents. They argued that this would exacerbate the already high cost of living in Havering.

> *"Landlords will pass any charges to the tenants…"*

> *"All this scheme does is gives more money to the council and makes rents higher for tenants as the costs are always borne by the people downstream."*

2. Focus on enforcement and existing laws: several respondents suggested that the Council should prioritise enforcing existing laws and regulations rather than implementing a new licensing scheme. They argued that there are already measures in place to address poor housing conditions and ASB and that the Council should focus on effectively enforcing these laws

> *"Rather than introducing additional licensing, I believe the council should focus on better enforcement of existing regulations. This could include more proactive inspections, targeted enforcement against known problem properties, and improved communication channels for tenants to report issues."*

> *"The licensing scheme cannot change the behaviour of the landlords or tenants… Instead of increasing the regulation, the Council should enforce the existing laws. None of the Councils that introduced this kind of rules in the past have shown improvement in tackling antisocial behaviour or quality of private rented properties."*

3. Criticism of Havering Council's own housing management: many respondents criticised Havering Council for not adequately maintaining its own social housing properties. They argued that the Council should address the issues within its own housing stock before targeting issues within the PRS

> *"The conditions of Havering council's own properties are appalling as published in the local press with conditions damp and mould. Perhaps get your own portfolio compliant first and set an example."*

> *"Councils sold their housing stock and now some people are getting rich on that and the council are paying rent to the rich. It's a complete mess. The council should repossess and utilise any empty properties, poorly managed properties, sub-letting properties, drug growing properties (there is a lot of them) and any other way of building council house stock again."*

4. Impact on rental market and housing supply: some respondents expressed concerns that the licensing scheme would discourage landlords from renting out their properties, leading to a decrease in the availability of rental housing. They argued that this would further worsen the housing crisis in Havering.

> *"This is an additional cost for landlords which they would pass on to their tenants. It would reduce the availability of private housing stock and limit the choices available to prospective tenants."*

> *"Many good landlords have sold up, which means rents rise as a result. You put more pressure on the existing landlords, more will leave putting more pressure on council houses (which there are none)."*

5. Misconception that licensing will increase HMOs: several respondents suggested that introducing an additional HMO licensing scheme will result in more HMOs being created, rather than regulating existing ones. This misconception has invited negative responses to the additional scheme from some residents.

> *"A bad idea by the Council to increase HMO in detriment to Havering residents."*

> *"HMO's should be discouraged as they are detrimental to the area… Lots of people in an HMO do not pay their share of council tax compared to normal households but will all be using services."*

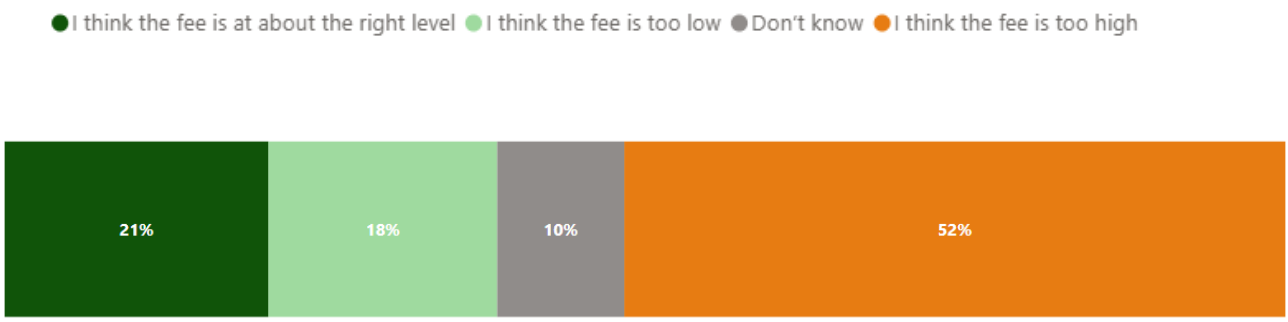
"I am very strongly against HMO's in the borough, licensed or not. The council should be working to reduce the amount of HMO's in Havering."
"It will encourage more HMOs which isn't a good thing for Havering."

3.6 Views on the proposed selective licensing scheme fee

The consultation asked respondents for their views on the proposed licence fee for the proposed selective licensing scheme and additional HMO licensing scheme. Information about the proposed licence fees was provided within the consultation documents.

Respondents were asked how reasonable they feel the proposed selective licence fee of £950 for a five-year licence is.

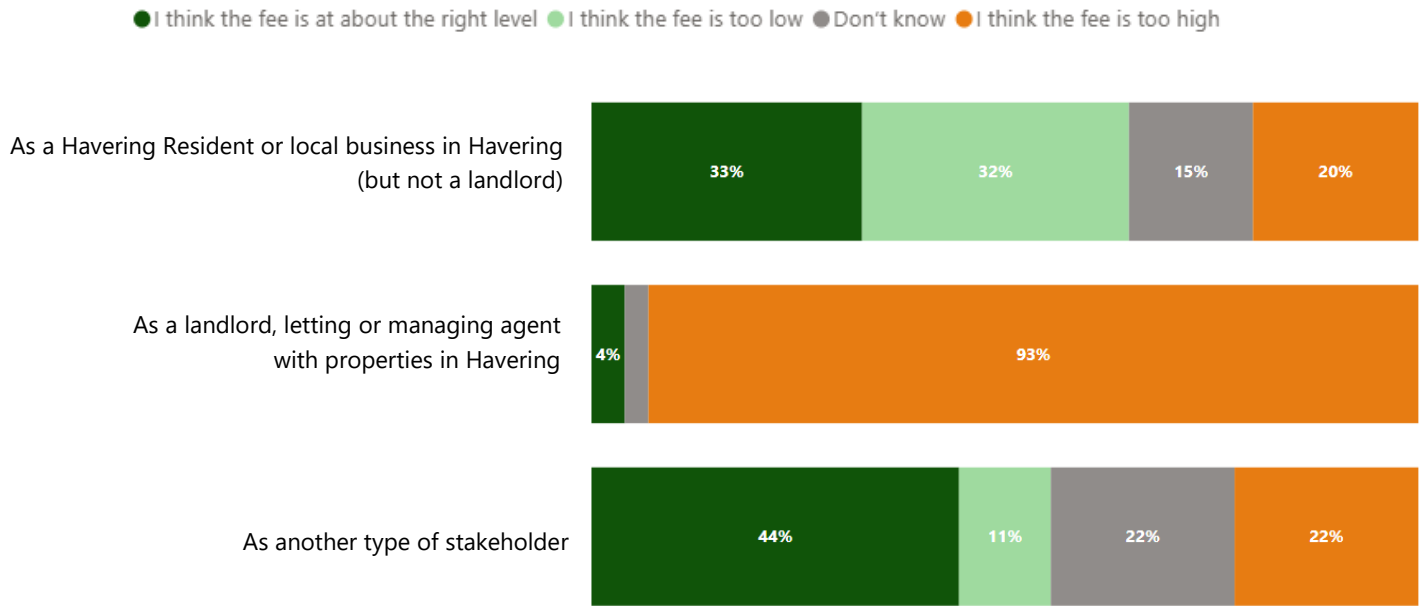
What are your views on the proposed selective licensing fee?



All **403** respondents answered this question. A majority of respondents, **52** per cent, said that they thought that the fee is too high, as opposed to **39** per cent who thought it was 'about right' or too low.

Landlords, letting and managing agents were consistent in responding that the fee is too high, with **93** per cent selecting this option; the other stakeholder groups had more positive responses with **65** per cent of residents or local businesses and **55** per cent of all other stakeholders responding that the fee is 'about right' or too low. A smaller percentage from each of these two stakeholder groups (**20** and **22** percent respectively) responded that the fee is too high.

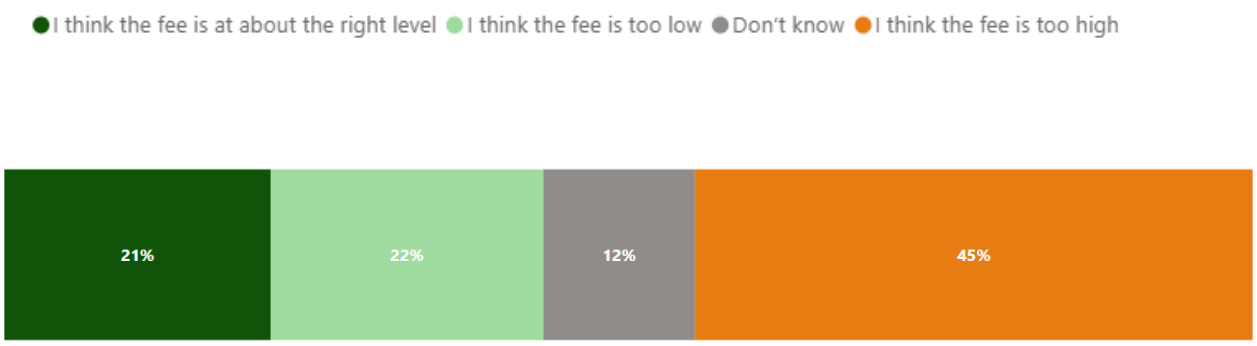
What are your views on the proposed selective licensing fee?



3.7 Views on the proposed additional HMO licensing scheme fees

Respondents were also asked how reasonable they feel the proposed additional HMO licence fee of £1400 for a five-year licence is.

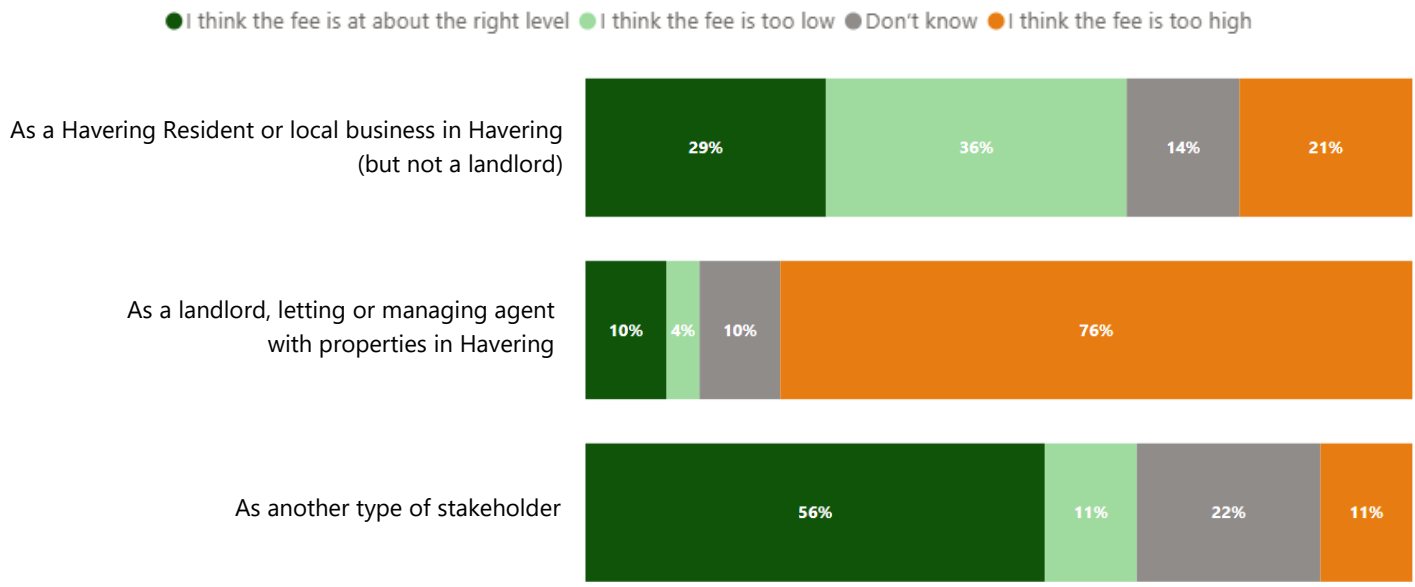
What are your views on the proposed additional HMO licensing fee?



All **403** respondents answered this question. A majority of respondents, **45** per cent, said that they thought that the fee is too high. However, **43** per cent of respondents thought the fee was either 'about right' or too low.

Landlords, letting and managing agents were consistent in responding that the fee is too high, with **76** per cent selecting this option; the other stakeholder groups had more positive responses, with **65** per cent of residents or local businesses and **67** per cent of all other stakeholders responding that the fee is either 'about right' or too low. A smaller percentage from each of these two stakeholder groups (**21** and **11** percent respectively) responded that the fee is too high.

What are your views on the proposed additional HMO licensing fee?



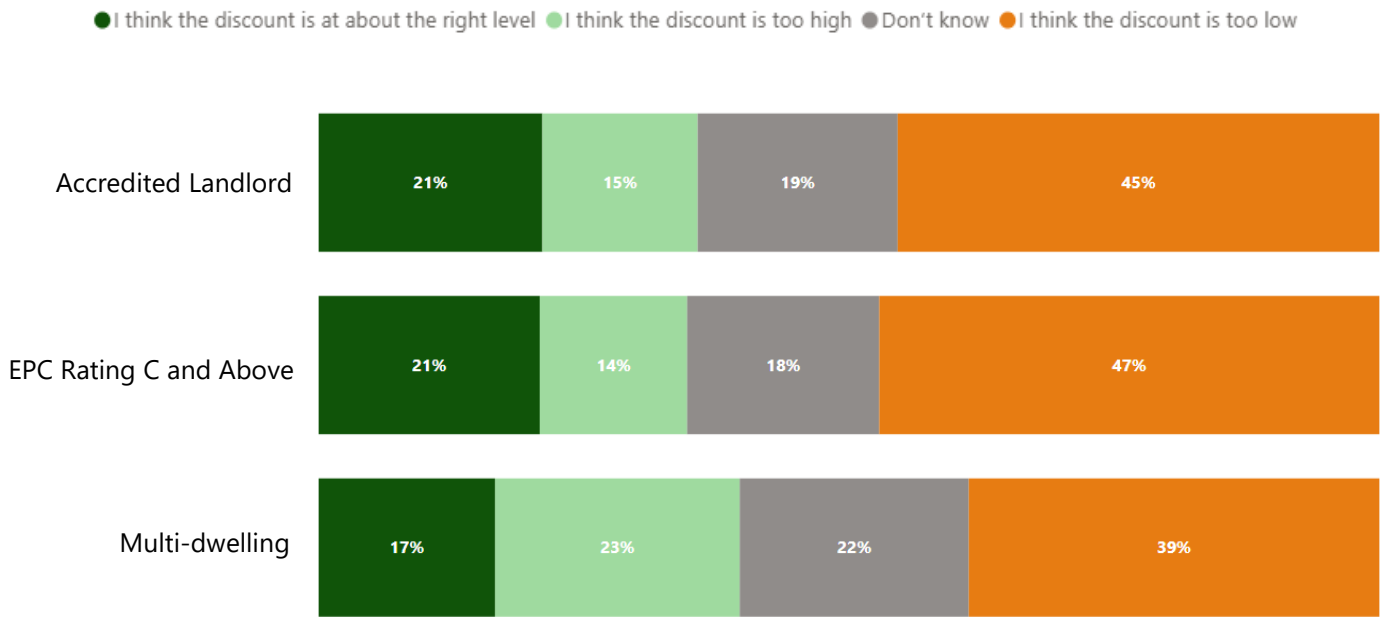
3.8 Views on the proposed licensing scheme discounts

During this consultation, the Council proposed three separate discounts. The discounts proposed were accredited landlord, energy performance certificate (EPC) rating (C and above), and multi-dwelling. Proposed discounts are applicable to both selective and additional HMO applications.

Nature of discount	Amount (Selective)	Amount (Additional)
Accredited landlord	£100 off Part B	£100 off Part B
EPC C and above rating	£75 off Part B	£75 off Part B
Multi-dwelling	£100 off Part A	£100 off Part A

The consultation asked respondents for their views on each of the proposed licence fee discounts. Information about the proposed licence fee discounts was provided within the consultation documents.

What are your views on the proposed discounts?



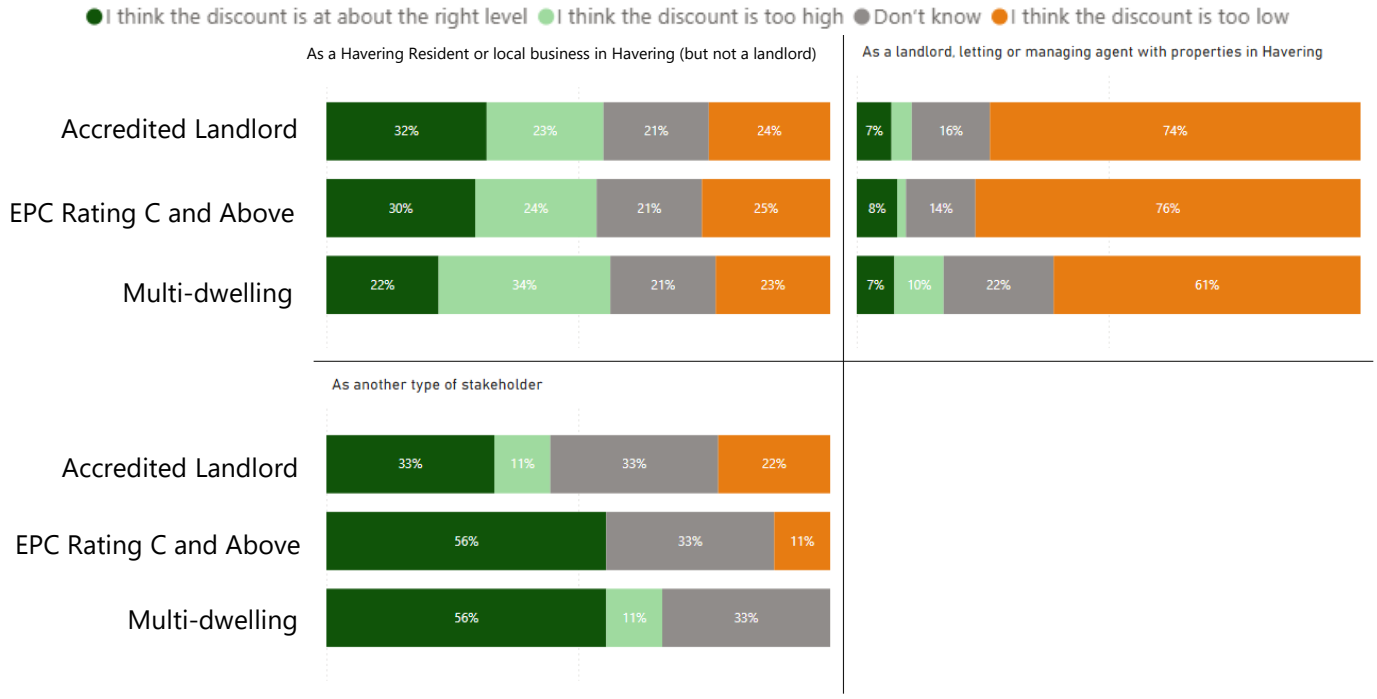
All **403** respondents shared their views on these discounts. **45** and **47** per cent respectively stated that the Accredited Landlord and EPC and discounts were too low. For the multi-dwelling discount **39** per cent stated that they felt it was too low, but **40** per cent thought it was either about the right level or too high. Around **20** per cent of respondents in each case said they didn't know.

Looking at the results by stakeholder group, around **75** per cent of landlords, letting and managing agents viewed the accredited landlord and EPC discounts as too low. When considering the multi-dwelling discount, a slightly lower proportion, **61** per cent, viewed the discount as too low.

Residents or local businesses views on the discounts are more positive, with over **50** per cent stating they viewed the accredited landlord, EPC multi-dwelling discounts as about the right level or too high, with only around **25** per cent viewing them as too low.

The responses of other stakeholders were more mixed for the Accredited landlord discount, with **44** per cent saying they were about the right level or too high, **33** per cent responding, 'don't know', and **22** per cent saying they were too low. Views on the EPC and multi-dwelling discounts were more favourable, with the majority, **56** per cent, saying they were about the right level.

What are your views on the proposed discounts?

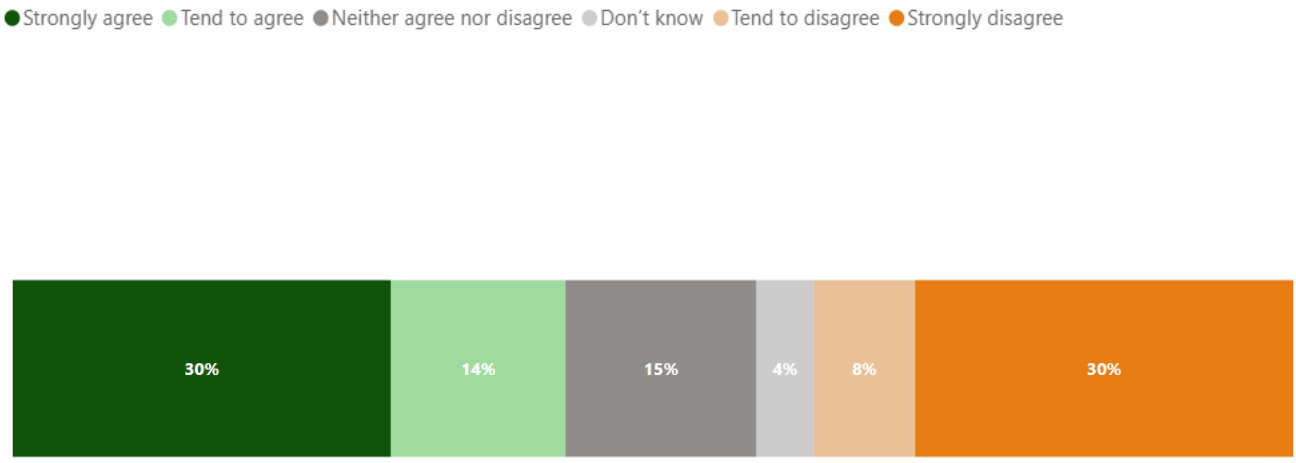


3.9 Views on the proposed selective licensing scheme conditions

The consultation asked respondents for their views on the proposed selective licence conditions. Information about the licence conditions was provided within the consultation documents.

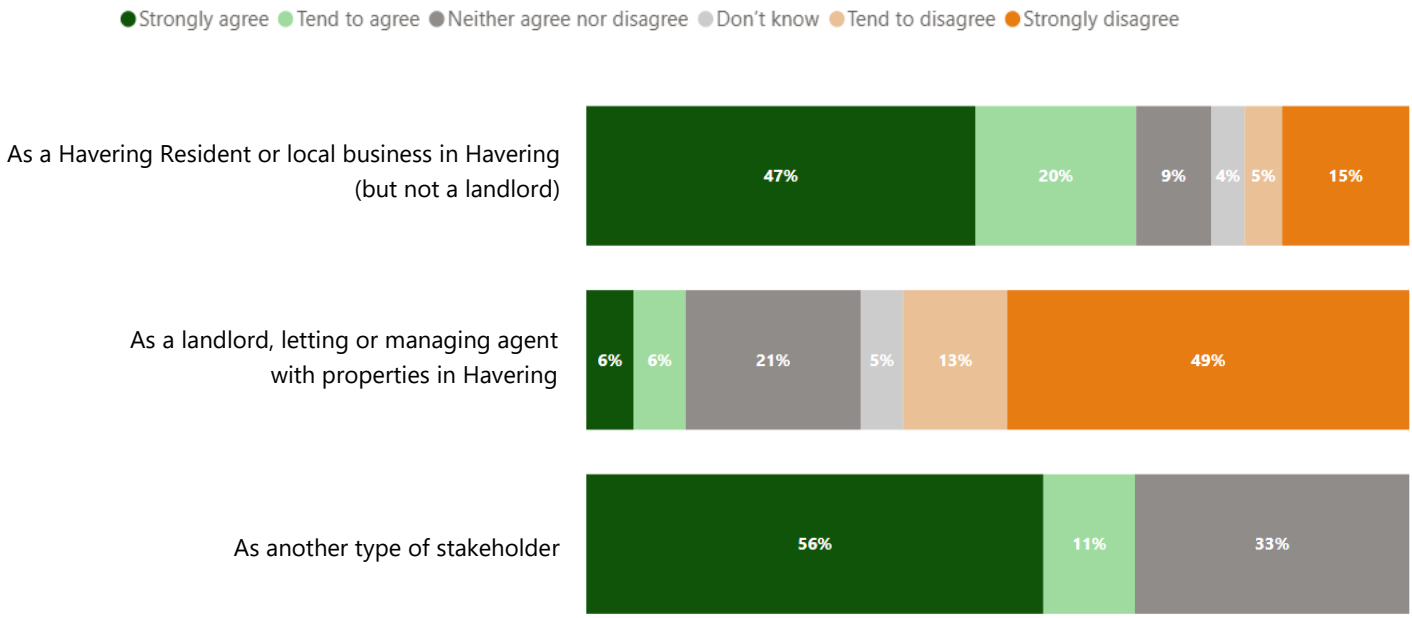
All **403** respondents answered this question. A majority of respondents, **44** per cent, agreed with the proposed licence conditions, while **38** per cent of respondents agreed.

To what extent do you agree or disagree with the proposed selective licensing discretionary conditions?



Looking at the responses by stakeholder group, residents or local businesses and other stakeholders are in favour, with the majority, **67** per cent, of each group agreeing, whereas landlords, letting and managing agents are opposed, with **62** per cent disagreeing with the selective licensing conditions.

To what extent do you agree or disagree with the proposed selective licensing discretionary conditions?



Free text comments regarding the selective licence conditions

The free text comments for the questions asking respondents to explain why they disagreed with the proposed selective licence conditions were analysed. The analysis looked at the responses by stakeholder type. As the 'other stakeholders' group was relatively small (at 9 respondents in total), this has not been looked at separately, but comments have been incorporated into the residents/local businesses group.

Landlords/agents

For landlords/agents, several themes emerged, but especially the notion that the current regulations and requirements are enough and that additional conditions are unnecessary.

1. *Excessive burden:* landlords voiced strong concerns that the selective licensing conditions impose unnecessary financial and administrative burdens. They argue that many of the proposed conditions duplicate existing legal requirements, increase compliance costs, and penalise responsible landlords. This, they fear, could lead to higher rents, reduced housing supply, and discourage participation in the PRS.

> *"For the reasons already given I do not believe that selective licencing is appropriate or warranted given existing legislation. All major conditions are covered by legislation and the discretionary conditions listed are essentially micro managing landlords and simply adding layers of bureaucracy and therefore cost to the private rental sector."*

> *"Some landlords own small properties and this will be an additional burden."*

2. *Focus on existing regulations:* several landlords argued that the proposed conditions largely overlap with existing regulations and requirements. They believed that enforcing and ensuring compliance with these existing regulations would be more effective than introducing new licensing conditions.

> *"There are already regulations in place and minimums to achieve. Regulation without enforcement is pointless. Enforcing existing rules and regulations may be a better starting point and less onerous for bona fide landlords who already provide properties of a high standard."*

> *"Discretionary conditions often duplicate national laws."*

> *"Discretionary conditions risk overregulation without clear benefit."*

3. *Impact on rents:* landlords expressed concerns that the additional costs associated with meeting the selective licensing conditions will ultimately be passed on to tenants in the form of higher rents. They believed that this will further exacerbate the affordability crisis in the rental market.

"While I understand the intention behind the policy, introducing additional costs to landlords will likely result in these expenses being passed on to tenants through higher rents."

"My main concern is that this additional licensing imposes extra costs on responsible landlords who are already managing standard single-family homes. These costs will likely be passed on to tenants in the form of higher rent, which could worsen affordability and increase financial pressure on local residents."

Residents/local businesses and other stakeholders

Similarly to the responses from landlords/agents, a common theme was that the licence conditions are covered by existing law. There was also a concern about the impact on tenants and that added requirements could lead to increases in rent and decrease in supply.

1. *Focus on existing regulations:* respondents expressed their disagreement, in many cases questioning the need for additional regulations and suggested that existing laws and enforcement should be sufficient.

"The council should focus on enforcing existing laws rather than introducing more regulations that affect good landlords and increase rental costs for tenants."

"There is no need for licensing scheme in the additional wards as the landlords are already responsible and bound by contracts with tenants. The contract has all the required conditions needed to safeguard the tenants."

2. *Impact on tenants:* several respondents raised concerns about the potential negative impact on tenants, such as increased rents, reduced housing options, and difficulties in obtaining references or finding accommodation due to stricter regulations

"The landlords just pass on the costs so you're harming local people."

"It increases costs for landlords, as well as increases cost of renting for tenants, whilst it reduces the amount of available private properties and fewer landlords."

3. *Property standards and maintenance*: several respondents noted that there should be added conditions relating landlords' responsibilities to upkeep both the inside and outside of their properties

"There should be a condition that landlords are responsive to fixing issues reported by tenants… Regular mould assessments should also be mandatory, in addition to gas and fire safety."
"Making sure the property is well kept and maintained."
"It should include damp and managing outdoor spaces. Trees and large shrubs need professional management… Tidy refuse areas too."

Respondents were also asked whether they felt that there were any other licence conditions (not already covered under the mandatory or proposed discretionary selective licence conditions) that they thought should be included. Most respondents either did not know or thought that there were not, but those who answered, 'Yes' (**11** per cent) were invited to say what conditions they thought should be added.

Are there any other selective licence conditions *(that are not already covered by a mandatory or proposed discretionary licence condition)* **that you think should be included?**

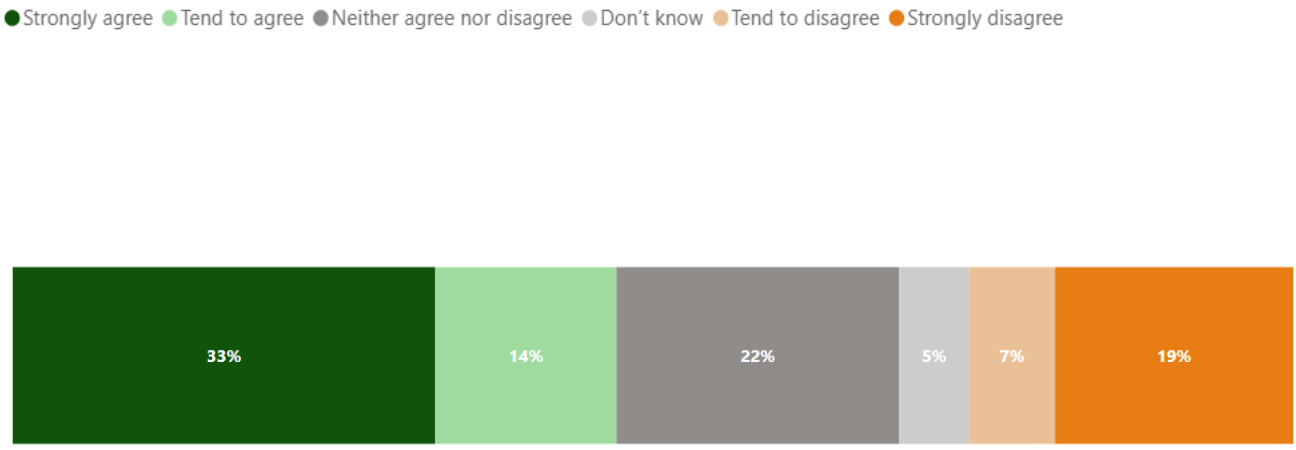


	Suggested extra selective licence conditions	
1.	**Vehicle and parking management**	Landlords must manage and limit the number of vehicles associated with a property, especially in areas with high vehicle ownership or permit parking. This includes: • Restrictions on vehicle repairs and sales outside properties • Monitoring multiple vehicle ownership per household
2.	**Landlord Registry and data accuracy**	Landlord information must be updated annually via the Land Registry to ensure accurate contact and ownership records

3.10 Views on the proposed additional HMO licensing scheme conditions

The consultation asked respondents for their views on the proposed additional HMO licence conditions. Information about the licence conditions was provided within the consultation documents.

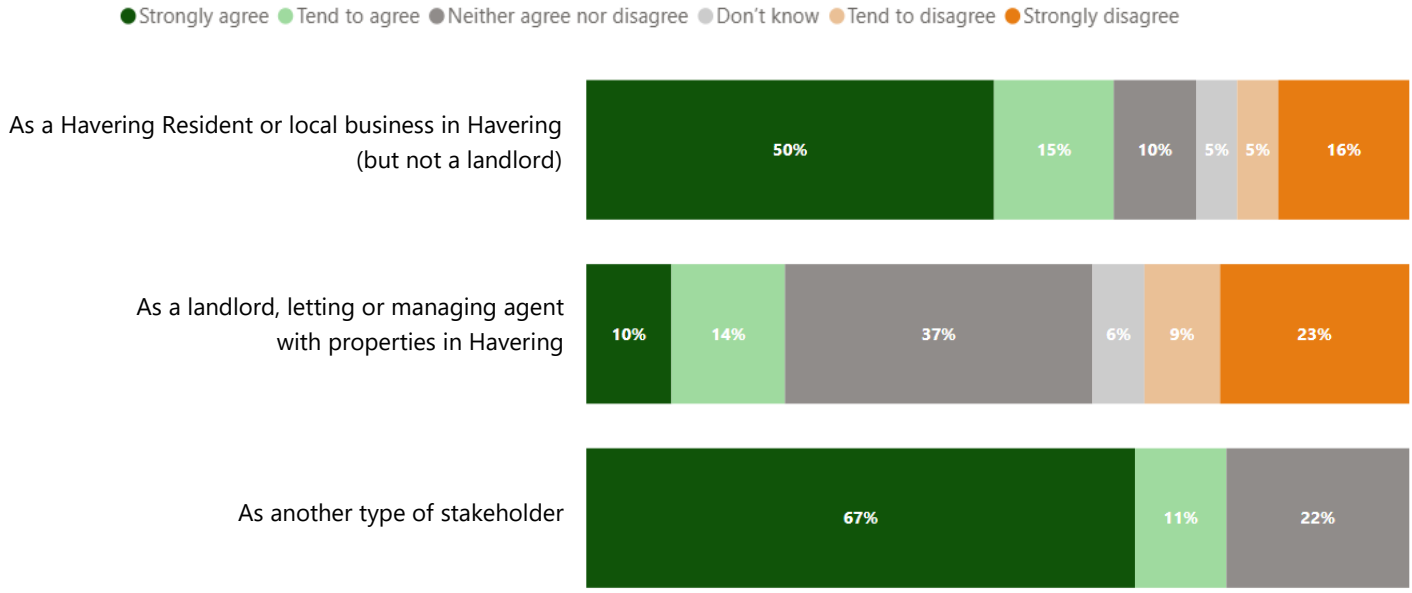
To what extent do you agree or disagree with the proposed additional HMO licensing discretionary conditions?



All **403** respondents answered this question. A majority of respondents, **47** per cent, agreed with the proposed additional HMO licence conditions, while **26** per cent of respondents disagreed. A proportion of respondents **27** per cent, neither agreed nor disagreed or didn't know.

Looking at the responses by stakeholder group, residents or local businesses and other stakeholders are in favour, with the majority, **65** per cent and **77** per cent of each group respectively, agreeing with the additional HMO licensing conditions. Landlords, letting and managing agents had more mixed views, with **32** per cent disagreeing, **24** per cent agreeing with the additional HMO licensing conditions, and **43** per cent saying they neither agreed nor disagreed, or didn't know.

To what extent do you agree or disagree with the proposed additional HMO discretionary licensing conditions?



Free text comments regarding the additional HMO licence conditions

The free text comments for the questions asking respondents to explain why they disagreed with the proposed additional HMO licence conditions were analysed. The analysis looked at the responses by stakeholder type. As the 'other stakeholders' group was relatively small (at 9 respondents in total), this has not been looked at separately, but comments have been incorporated into the residents/local businesses group.

Landlords/agents

For landlords/agents, several themes emerged, all of which were similar to those expressed when asked about the selective licence conditions, especially the notion that the current regulations and requirements are enough and that additional conditions are unnecessary.

1. Excessive burden: many landlords and agents argue that the proposed additional HMO licensing conditions are excessive, place an unfair burden on responsible landlords (and in certain cases should be the responsibility of the tenant) and should not go further than national law.

"*The objectives of additional HMO are already being achieved without any issues.*"
"*These conditions are excessive and disproportionate.*"
"There are laws in place already, they just need to be enforced. Which is a police issue not a landlord issue. Bad landlords will always be bad landlords."

2. Focus on existing regulations: many landlords argued that the proposed additional HMO licensing conditions largely overlap with existing regulations and requirements, often stating that the current regulations are already too strict. They believed that enforcing and ensuring compliance with these existing regulations would be more effective than introducing new licensing conditions.

"The sector is already over regulated…Nothing will improve until there is better rental property supply, and regulation and taxation are currently forcing private residential landlords to sell up and do something else with their money."
"There is already legislation in force to deal with the majority of the discretionary conditions, we do not need more unnecessary compliance requirements on the sector."
"I believe these requirements are already in place. Whichever council department or other agency has responsibility for ensuring compliance should already be dealing with this and if they aren't they should be held to account."
"Councils already have the authority to enforce these standards, and the emphasis should be on using that power effectively."

3. *Impact on rents and supply:* landlords expressed concerns that the additional costs associated with meeting the licensing conditions will ultimately reduce the supply of PRS properties and be passed on to tenants in the form of higher rents. They believed that this will further exacerbate the affordability crisis in the rental market.

> *"The introduction will lead to increase in rent in the Borough and drive more people into claiming benefits."*

> *"Adding yet more conditions risks: [...] Driving up costs, which are ultimately passed on to tenants in the form of higher rents."*

4. *Targeting bad landlords:* some landlords suggested that instead of imposing licensing conditions on all landlords, the focus should be on targeting and penalising landlords who are providing inadequate housing or failing to meet their responsibilities. They believed that this targeted approach would be more effective in improving housing standards.

> *"Instead of broad and discretionary conditions, I recommend a focus on: Clear, evidence-based minimum standards; Proportionate regulation based on the size and risk profile of the property; Targeted enforcement against landlords who have a history of poor management or non-compliance."*

> *"Landlords shouldn't have to pay to prove they're complying with the rules—compliance should be monitored through routine checks and proper oversight, not additional fees."*

Residents/local businesses and other stakeholders

Similarly to the responses from landlords/agents, a common theme was that the licence conditions are covered by existing law. There was also a concern about the impact on tenants, and further comments on the mistaken assumption that an additional HMO licensing scheme would increase the number of HMOs in the borough.

1. *Focus on existing regulations:* respondents expressed their disagreement, citing concerns about increased costs for landlords and potential rent increases for tenants. They questioned the need for additional regulations and suggested that existing laws and enforcement should be sufficient.

> *"I also disagree with the proposed discretionary conditions because they often duplicate existing legal requirements, creating unnecessary complexity and scope for inconsistency."*

> *"Rather than helping improve housing standards, this creates confusion and cost without clear benefits to tenants."*

> *"This is just a scheme to increase funds, and doesn't help people."*

> *"Unless it is mandatory, HMO landlords will not be obliged to follow the law to ensure they provide safe and good accommodation for private tenants. The tenants need to also be vetted properly. The council needs to put more checks and stringent rules in place to monitor the current state of HMO and ensure it is enforced, hence discretionary measures or rules will not work nor will there be an incentive to enforce them."*

2. Impact on tenants: several respondents raised concerns about the potential negative impact on tenants, such as increased rents, reduced housing options, and difficulties in obtaining references or finding accommodation due to stricter regulations.

> *"I believe these measures are overly restrictive and risk doing more harm than good. Imposing additional, locally defined standards—beyond what is already required under national HMO licensing—adds unnecessary complexity and cost for responsible landlords. These discretionary conditions… may discourage investment in HMOs, reduce available accommodation for lower-income tenants, and ultimately push more people into overcrowded or informal living situations. Rather than improving quality, these extra conditions may price out both landlords and tenants, undermining housing access in the borough."*

> *"It increases costs for landlords, as well as increases cost of renting for tenants, whilst it reduces the amount of available private properties and fewer landlords."*

3. *Misconception that licensing will increase HMOs:* several respondents suggested that introducing an additional HMO licensing scheme would result in more HMOs being created, rather than regulating existing ones. They highlighted their concerns about living in close proximity to HMOs and implied a preferred emphasis on HMO planning regulation as opposed to more licensing conditions.

> *"Drug use, overcrowding, noise at night time is our new normal living next door to HMO property."*

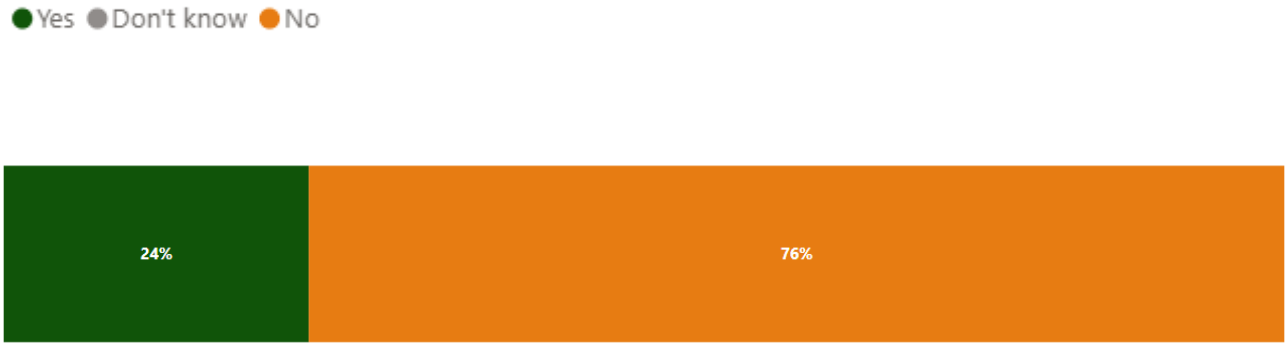
> *"Safety walking the streets is a concern. Neighbours in the street should be consulted before a HMO is approved."*

> *"I believe that HMOs should not be allowed in residential areas… I am worried that HMOs will be popping up all over our streets creating issues for residents who have owned properties in this area for many years."*

"There are too many HMOs already… Antisocial behaviour is increasing and residents who have lived here all their lives are being forced out by this!"

Respondents were also asked whether they felt that there were any other licence conditions (not already covered under the mandatory or proposed discretionary additional HMO licence conditions) that they thought should be included. Most respondents thought that there were not, but those who answered, 'Yes' (**24** per cent) were invited to say what conditions they thought should be added.

Are there any other additional HMO licence conditions *(that are not already covered by a mandatory or proposed discretionary licence condition)* **that you think should be included?**

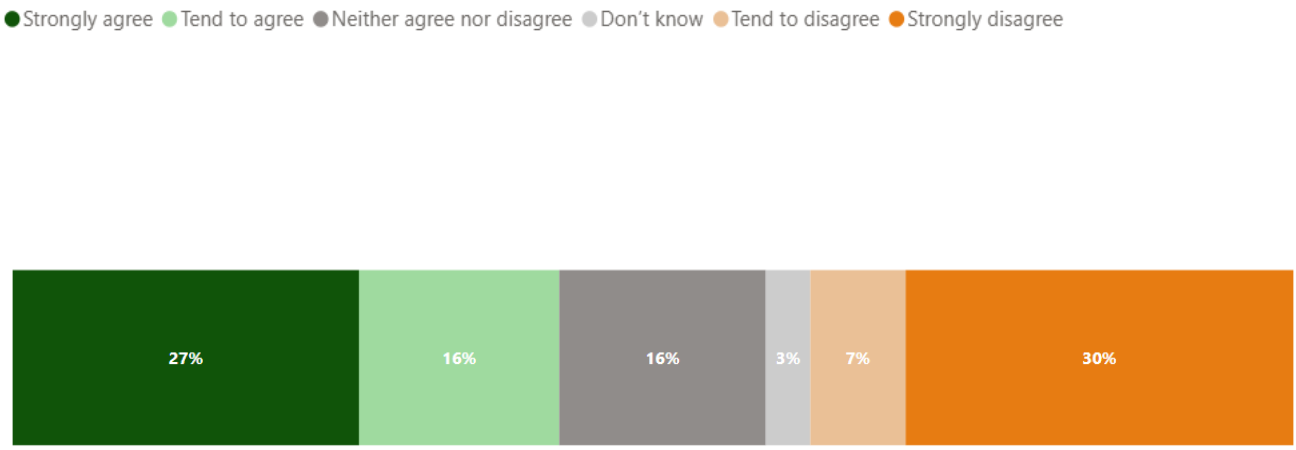


Suggested extra additional HMO licence conditions	
Tenant vetting and behavioural standards	Require landlords to conduct criminal background checks and vet tenants for suitability. Tenants must sign behavioural agreements covering anti-social behaviour, noise, cleanliness, and respect for neighbours.
Parking and vehicle restrictions	Limit the number of vehicles per property. Tenants must not repair or sell vehicles from the premises. Consider implementing parking control zones in HMO-dense areas.

3.11 Views on the proposed licensing scheme objectives

The consultation asked respondents for their views on the proposed licensing scheme objectives. Information about the licensing scheme objectives was provided within the consultation documents.

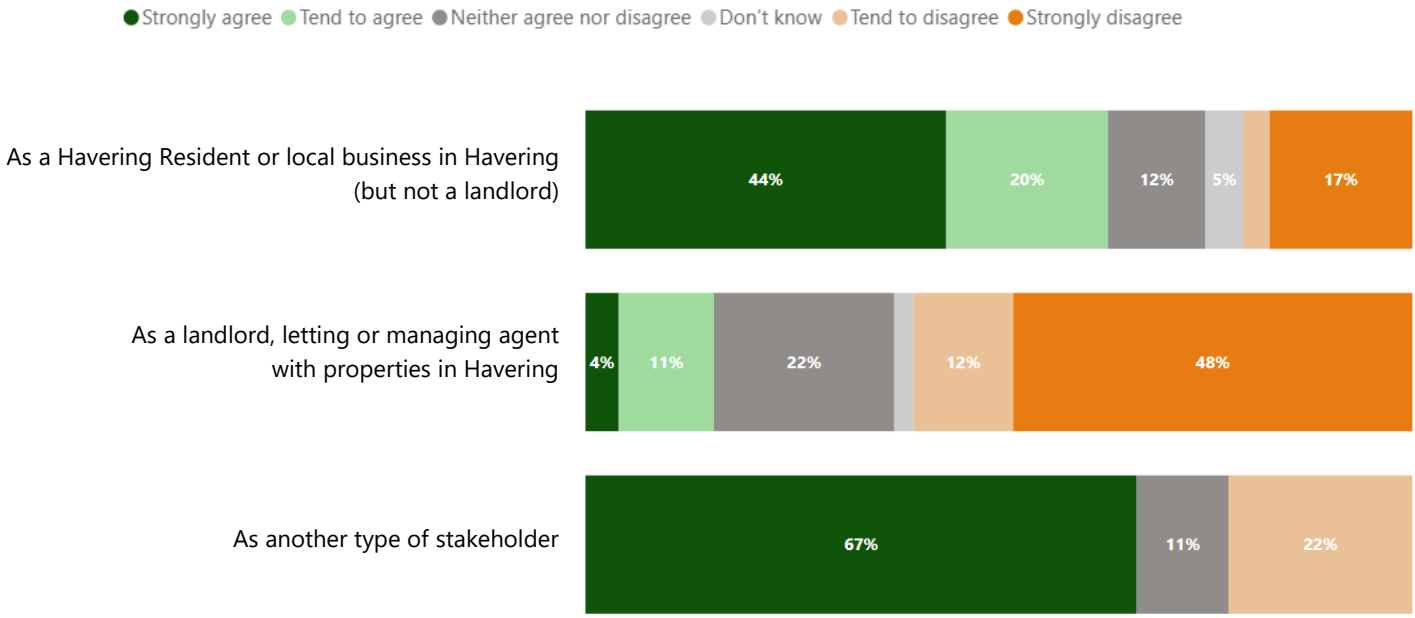
To what extent do you agree or disagree with the proposed licensing scheme objectives?



All **403** respondents answered this question. A slight majority of respondents, **43** per cent, agreed with the proposed licensing scheme objectives, while **37** per cent of respondents disagreed. A proportion of respondents, nearly **20** per cent, said they neither agreed nor disagreed or didn't know.

Looking at the responses by stakeholder group, residents or local businesses and other stakeholders are in favour, with the majority, **64** per cent and **67** per cent of each group respectively, agreeing with the licensing scheme objectives. Landlords, letting and managing agents were largely opposed, with the majority, **60** per cent, disagreeing.

To what extent do you agree or disagree with the proposed licensing scheme objectives?



Free text comments regarding the licence objectives

The free text comments for the questions asking respondents to explain why they disagreed with the proposed licence objectives were analysed. The analysis looked at the responses by stakeholder type. As the 'other stakeholders' group was relatively small (at 9 respondents in total), this has not been looked at separately, but comments have been incorporated into the residents/local businesses group.

Landlords/agents

Landlords/agents were broadly negative towards the licensing scheme objectives. Many argued that existing laws already cover the scheme's objectives, and that enforcement—not new fees—is what's needed. There was scepticism about the Council's ability to achieve the objectives it has set out to achieve.

1. Ineffectiveness of licensing scheme: there is scepticism about whether the licensing scheme will actually achieve its stated goals, with concerns that it is more symbolic than impactful.

> *"Licensing does not improve poverty, anti-social behaviour, nor crime in an area."*

> *"Unless the objectives are met, which needs to be monitored, there is actually no point to this."*

> *"Licensing schemes often fail to target the actual problem properties, instead burdening compliant landlords with paperwork and fees."*

2. Existing regulations are sufficient: landlords argue that the objectives of the licensing scheme can already be achieved through existing laws and enforcement mechanisms, making the scheme redundant.

> *"The necessary legal tools and enforcement powers already exist, yet they are not being consistently or effectively used."*

Residents, local businesses and other stakeholders

Many residents, local businesses, and other stakeholders agreed with the intentions behind the licensing objectives, but they expressed doubts about the scheme's ability to deliver these outcomes. The most common concerns included the lack of enforcement and monitoring, which undermined confidence in achieving the objectives. Additionally, there was scepticism about the Council's capacity to manage the scheme effectively.

1. Enforcement and effectiveness concerns: there is scepticism about whether the Council will effectively enforce the scheme or achieve its stated objectives.

> *"I agree that they are good objectives but I don't believe you will actually achieve them because you don't actually bother to inspect or enforce…"*

> *"I agree with the objectives but don't see how the licensing scheme will achieve them unless properties are properly monitored."*

2. Council capability and resource issues: stakeholders express doubts about the Council's ability to manage the scheme due to staffing, funding, and operational limitations.

> "*Objectives will be set but never followed through – too busy, not enough staff etc."*

> *"Once again highlighting council's inability to manage their workload… lack of funding… lack of staff and facilitation… unrealistic expectations will not be met… the council cannot cope with this level of requirement and management ongoing."*

Respondents were also asked whether they felt that there were any other licence scheme objectives (not already covered by the objectives listed) that they thought should be included. Most respondents thought either that there were not, or that they didn't know, but those who answered, 'Yes' (**8** per cent) were invited to say what objectives they thought should be added.

Are there any other licence scheme objectives *(that are not already covered by the objectives listed)* **that you think should be included?**



Suggested extra licensing objectives	
Ensure licensing schemes deliver real impact	Licensing should not be a bureaucratic exercise or financial burden without tangible benefits. The scheme must lead to genuine improvements in housing standards and tenant wellbeing.
Support responsible landlords	Reward landlords who consistently comply with regulations through reduced fees or exemptions and provide access to a dedicated support team for tenant and property management.
Improve communication and feedback	Share regular updates and performance reports with landlords to foster transparency and help them stay informed about scheme developments and compliance deadlines.
Use licensing data proactively	Use scheme databases to alert landlords about upcoming certificate expirations (e.g., gas safety, electrical checks), helping them maintain compliance

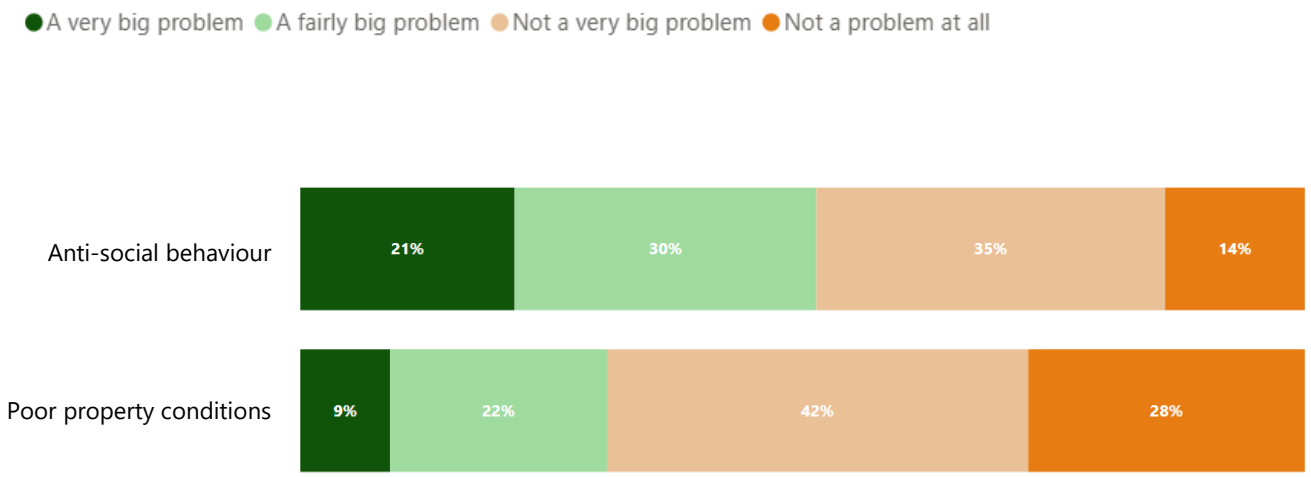
3.12 Views on issues in Havering's PRS

Respondents to the survey were asked their opinion of issues relating to poor property conditions and ASB in private rented properties in the borough.

Respondents were asked to what extent they believed that poor property conditions and ASB are problems in their local area of Havering.

All **403** respondents answered this question.

To what extent do you believe each of the following to be a problem in your local area of Havering?



Anti-social behaviour (ASB)

A majority of respondents, **51** per cent, believed that ASB was a fairly big or a very big problem, whereas **49** per cent, stated that they believed it was not a very big problem or not a problem at all.

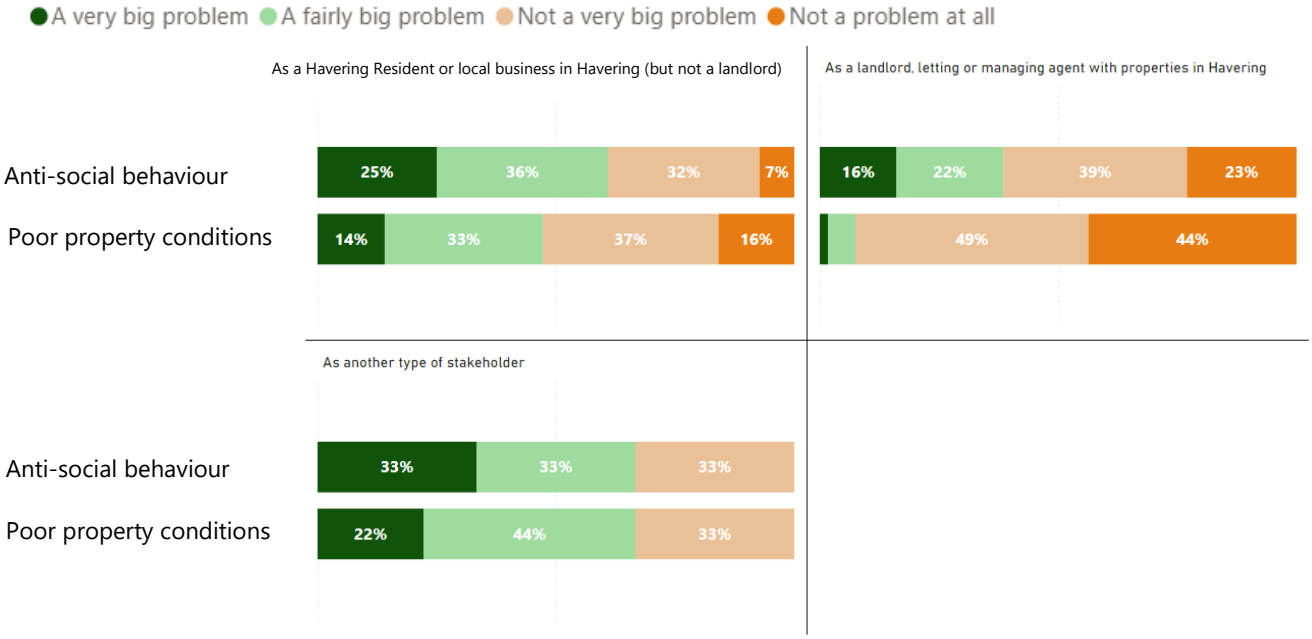
When looking at the responses by stakeholder group, as can be seen in the graphs below, there is polarity between landlords, letting and managing agents, and residents or local businesses and other stakeholders; where only **38** per cent of landlords, letting and managing agents viewed ASB as a fairly big or very big problem, in contrast, **61** per cent of residents or local businesses and **66** per cent of other stakeholders viewed it as a fairly big or a very big problem.

Poor property conditions

70 per cent of respondents thought that poor property conditions were not a very big problem or not a problem at all, as opposed to **31** per cent who thought they were fairly big or a very big problem.

There is also some disparity between the views of landlords, letting and managing agents and those of residents or businesses and other stakeholders when considering poor property conditions; where **93** per cent of landlords, letting and managing agents viewed poor property conditions as not a very big problem or not a problem at all, only **53** per cent of residents or local businesses concurred. However, **66** per cent of other stakeholders held the opposing perspective and viewed poor property conditions as a fairly big or very big problem.

To what extent do you believe each of the following to be a problem in your local area of Havering?

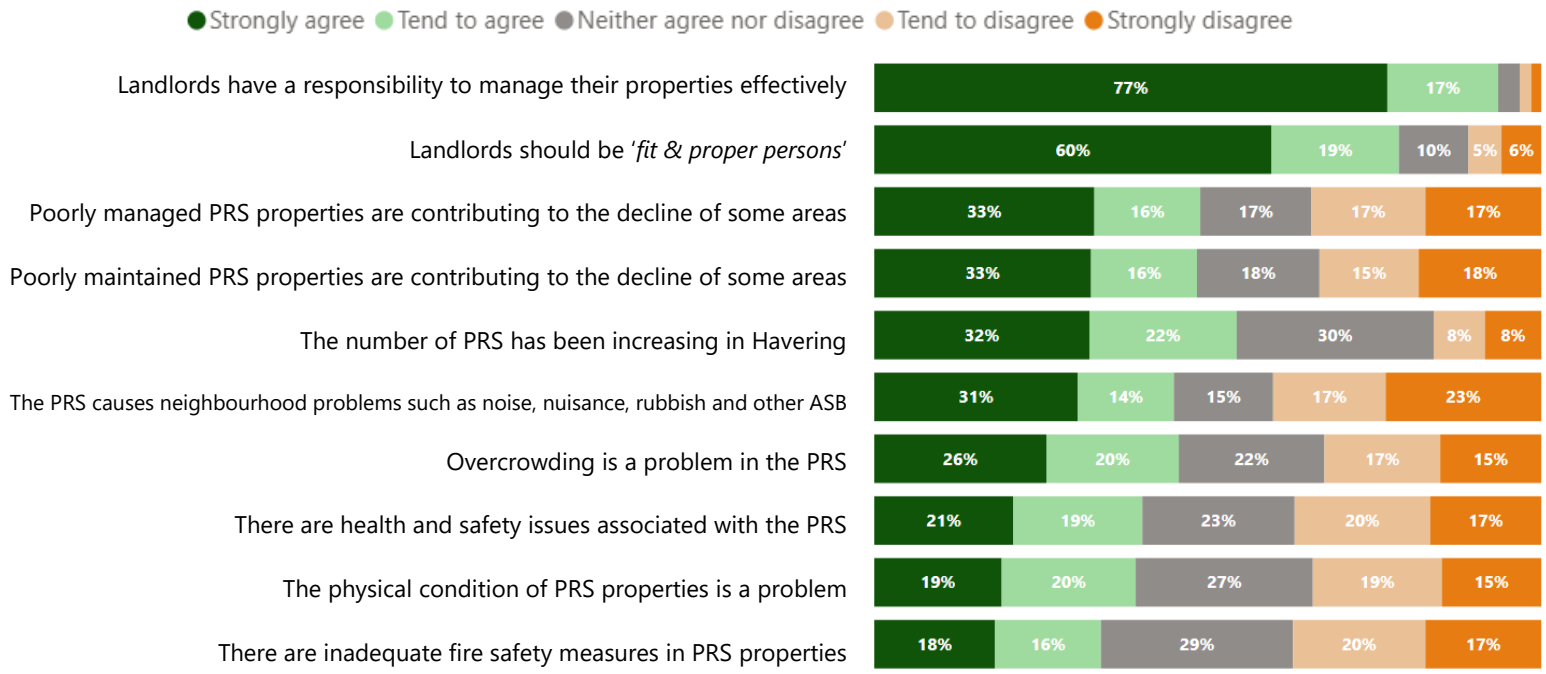


3.13 Views on the PRS in Havering

Respondents were also asked about their views on the PRS in Havering as a whole.

All **403** respondents answered this question.

To what extent do you agree or disagree with the following statements?



Landlord responsibility

When asked if landlords have a responsibility to manage their properties effectively, the overwhelming majority of respondents, **94** per cent, either agreed or strongly agreed.

'Fit and proper' person

When asked if landlords should be 'fit and proper' persons (e.g. have proper management or financial arrangements in place and not have convictions for certain types of offences), again, the overwhelming majority, **79** per cent, either agreed or strongly agreed.

Poorly managed properties

When asked whether poorly managed private rented properties were contributing to the decline of some areas in Havering, the responses were mixed, with **49** per cent either agreeing or strongly agreeing and **34** per cent disagreeing or strongly disagreeing.

Poorly maintained properties

When asked whether poorly maintained private rented properties were contributing to the decline of some areas in Havering, the responses were mixed, with **49** per cent either agreeing or strongly agreeing and **33** per cent disagreeing or strongly disagreeing.

Number of private rented properties

When asked whether the number of private rented properties in the borough has been increasing, **54** per cent agreed or strongly agreed, while only **16** per cent disagreed or strongly disagreed. A large proportion of respondents, **30** per cent, stated that they neither agreed nor disagreed.

Neighbourhood problems such as noise, nuisance, rubbish and other ASB

When asked whether the PRS causes neighbourhood problems, the majority, **45** per cent, agreed or strongly agreed, while **40** per cent disagreed or strongly disagreed.

Overcrowding

When asked whether there was an issue with overcrowding in private rented properties in the borough, a majority, **46** per cent, agreed or strongly agreed, while **32** per cent disagreed or strongly disagreed and **22** per cent neither agree nor disagreed.

Health and safety Issues

When asked whether there were health and safety issues with private rented properties in the borough, the responses were more mixed, with **40** per cent either agreeing or strongly agreeing and **37** per cent disagreeing or strongly disagreeing. **23** per cent neither agreed nor disagreed.

Physical condition of properties

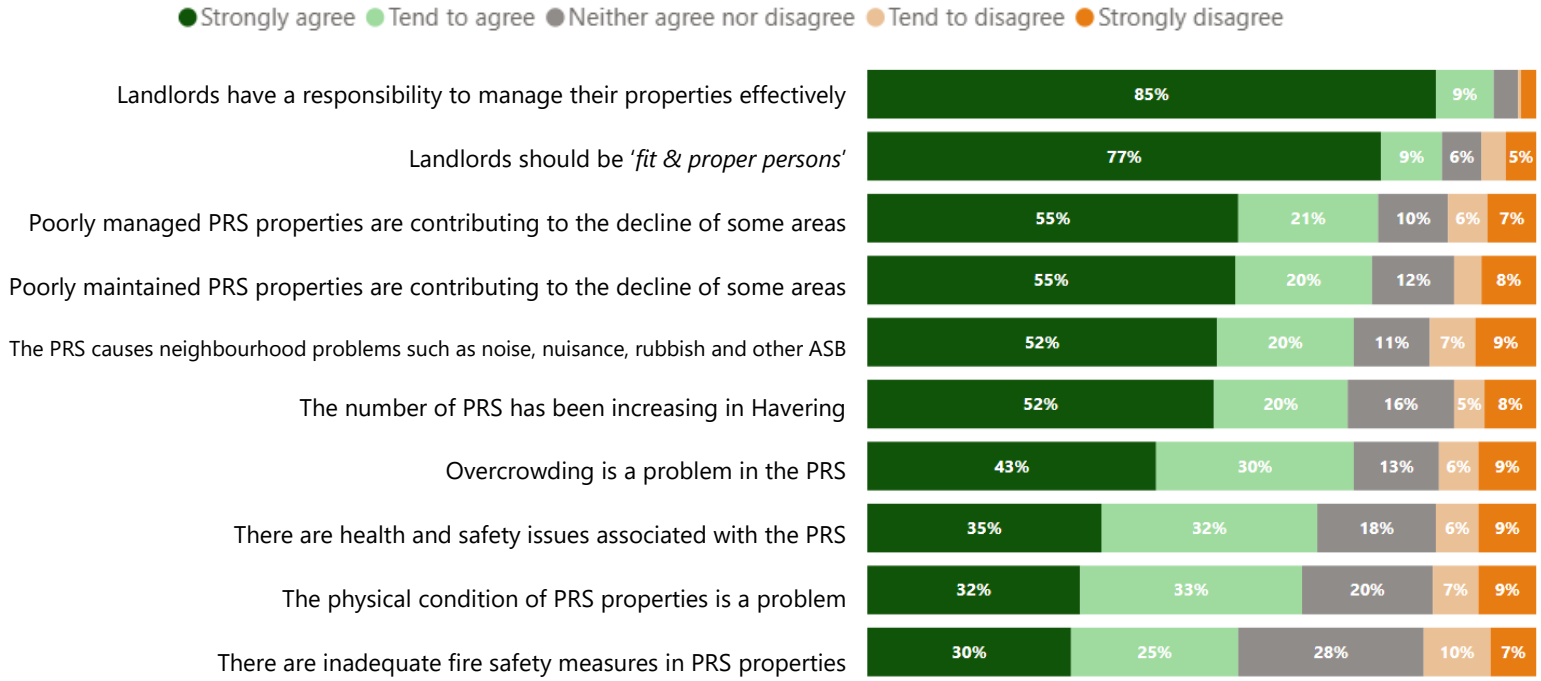
When asked whether the physical condition of private rented properties in the borough was a problem, the responses were again mixed, with **39** per cent either agreeing or strongly agreeing and **34** per cent disagreeing or strongly disagreeing. **27** per cent neither agreed nor disagreed.

Inadequate fire safety measures

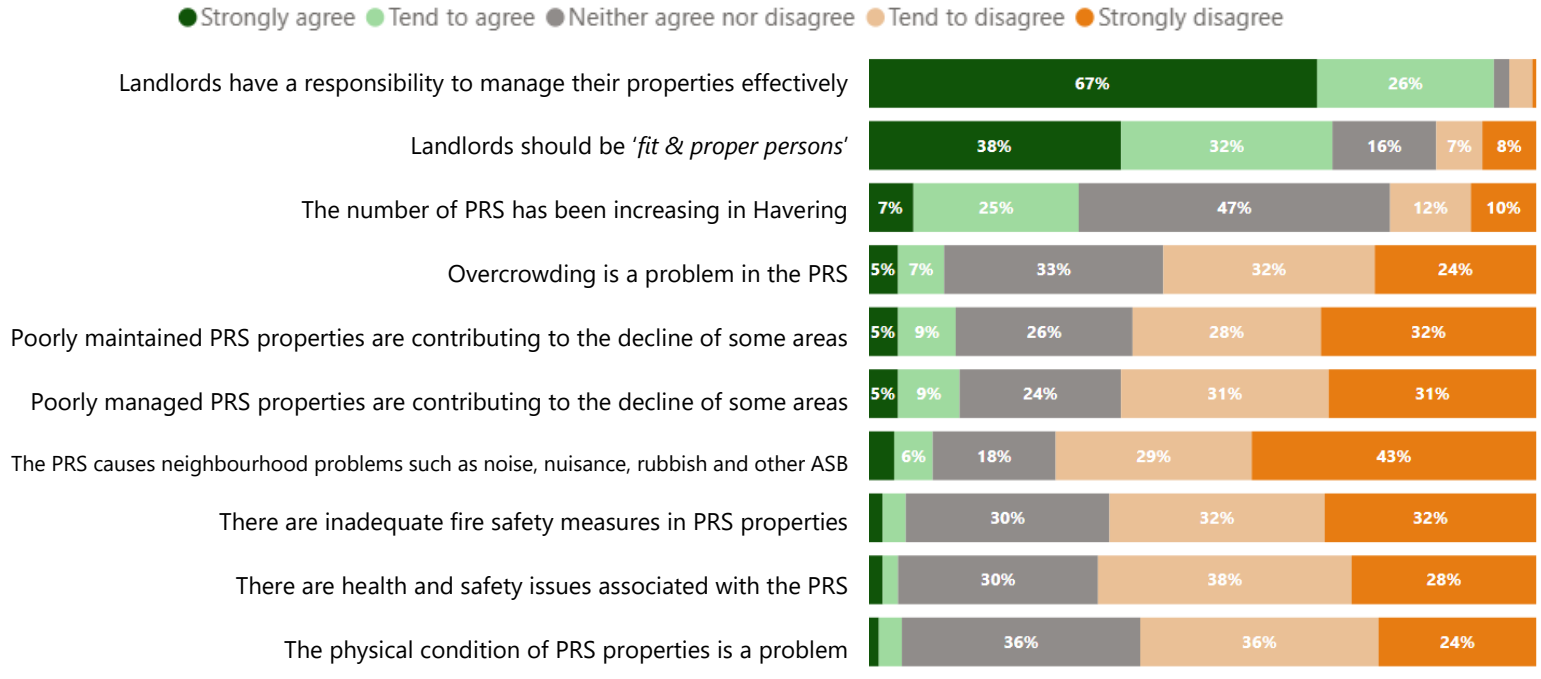
When asked whether there were inadequate fire safety measures in private rented properties in the borough, responses were again mixed. **34** per cent agreed or strongly agreed, **37** per cent disagreed or strongly disagreed and **29** per cent stated that they neither agreed nor disagreed.

Similarly, when looking at responses by stakeholder group, there is a stark contrast between landlords, letting and managing agents' perceptions of the PRS in Havering and that of residents or local businesses and other stakeholders. The stakeholder breakdown is shown in the graphs below.

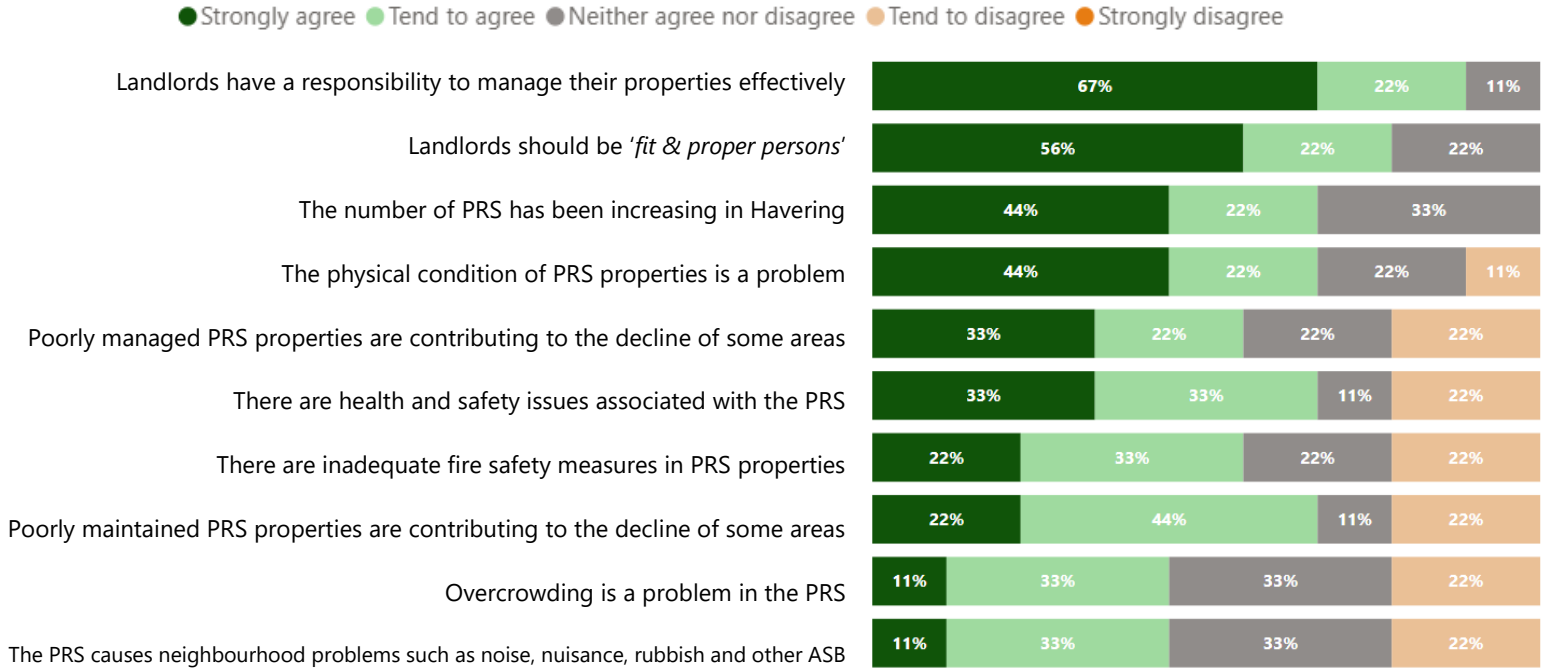
To what extent do you agree or disagree with the following statements? *(residents or local businesses)*



To what extent do you agree or disagree with the following statements? *(landlords, letting or managing agents)*



To what extent do you agree or disagree with the following statements? *(another type of stakeholder)*

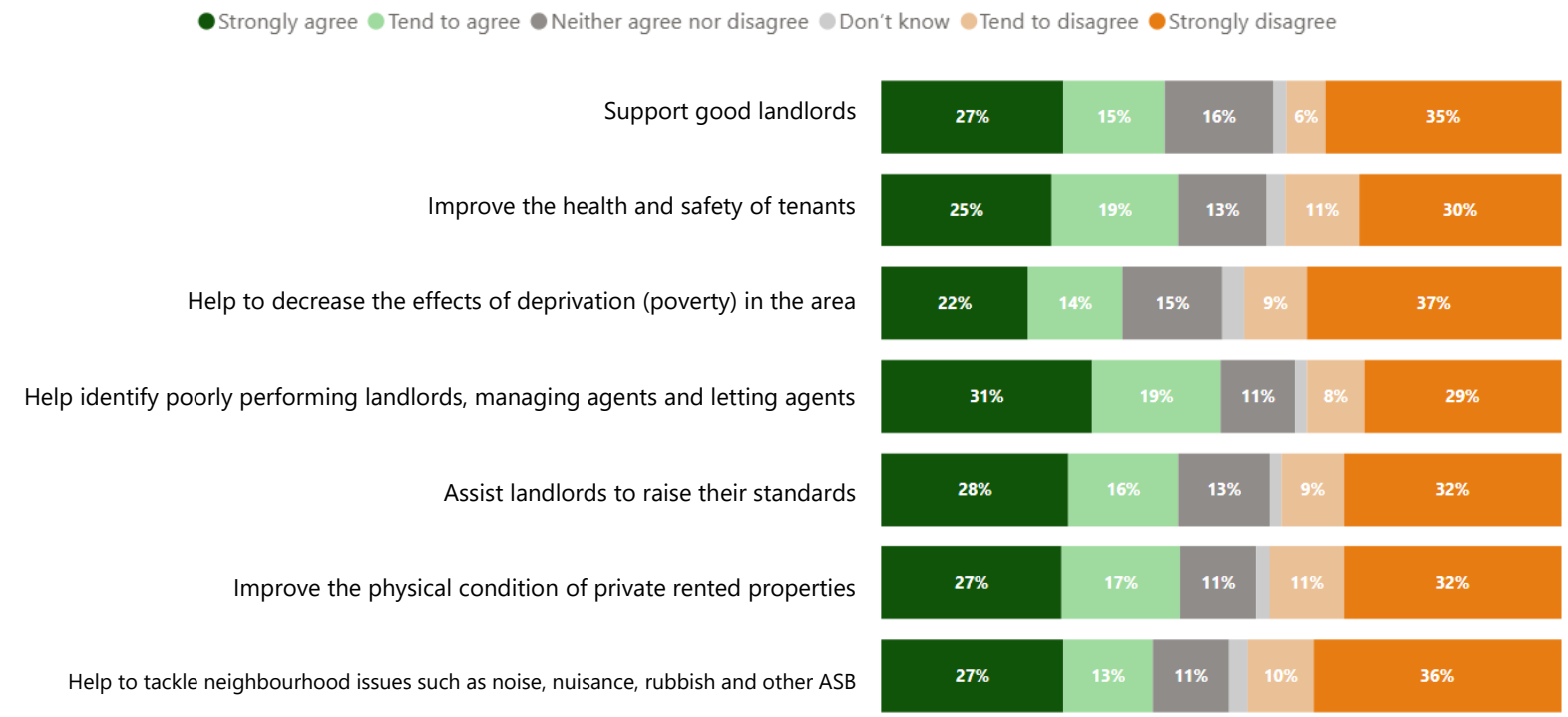


Views on selective licensing scheme outcomes in Havering

Respondents were also asked about their views on whether they thought a selective licensing scheme in Havering would help to achieve certain outcomes.

All **403** respondents answered this question.

To what extent do you agree or disagree that a selective licensing scheme will help to achieve the following outcomes?



The question asked respondents to what extent they agreed that a selective licensing scheme in Havering would help to achieve the following outcomes:

Support good landlords

42 per cent, either agreed or strongly agreed, while **41** per cent said they disagreed or strongly disagreed. **17** per cent said they neither agreed nor disagreed or didn't know.

Improve the health and safety of tenants

44 per cent, either agreed or strongly agreed, while **41** per cent either disagreed or strongly disagreed. **15** per cent said they neither agreed nor disagreed or didn't know.

Help to decrease the effects of deprivation (poverty) in the area

A majority of respondents, **46** per cent, either disagreed or strongly disagreed, while **36** per cent either agreed or strongly agreed. **18** per cent said they neither agreed nor disagreed or didn't know.

Help identify poorly performing landlords, managing agents and letting agents

A majority of respondents, **50** per cent, either agreed or strongly agreed, while **37** per cent said they disagreed or strongly disagreed. **13** per cent said they neither agreed nor disagreed or didn't know.

Assist landlords to raise their standards

44 per cent, either agreed or strongly agreed, while **41** per cent either disagreed or strongly disagreed. **15** per cent said they neither agreed nor disagreed or didn't know.

Improve the physical condition of private rented properties

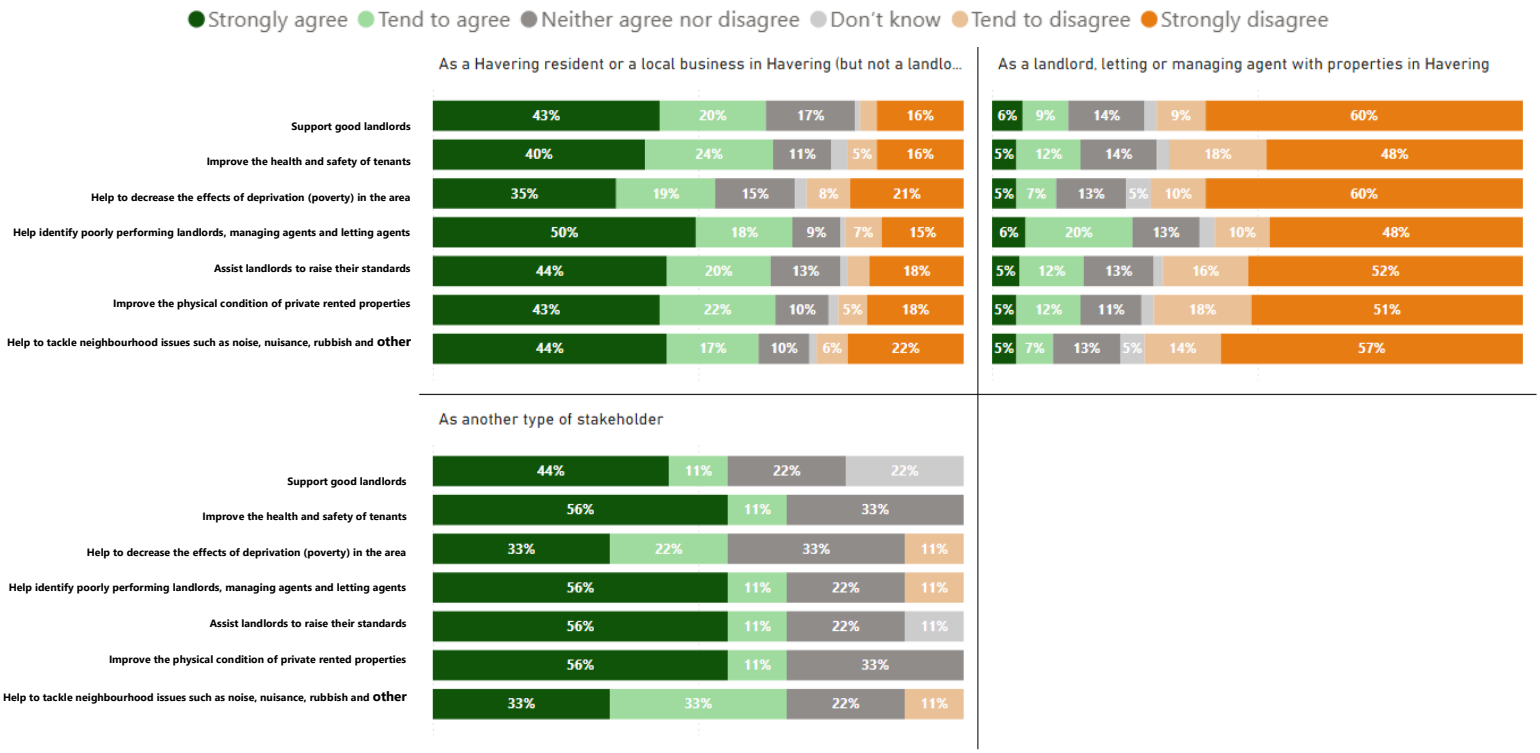
44 per cent, either agreed or strongly agreed, while **43** per cent either disagreed or strongly disagreed. **13** per cent said they neither agreed nor disagreed or didn't know.

Help to tackle issues of neighbourhood problems such as noise nuisance, rubbish and other ASB

A majority of respondents, **46** per cent, either disagreed or strongly disagreed, while **40** per cent either agreed or strongly agreed. **14** per cent said they neither agreed nor disagreed or didn't know.

As is the case with many of the other questions, there is polarity between the views of landlords, letting and managing agents and those of residents and local businesses and other stakeholders. The stakeholder breakdown is shown in the graphs below.

To what extent do you agree or disagree that a selective licensing scheme will help to achieve the following outcomes?

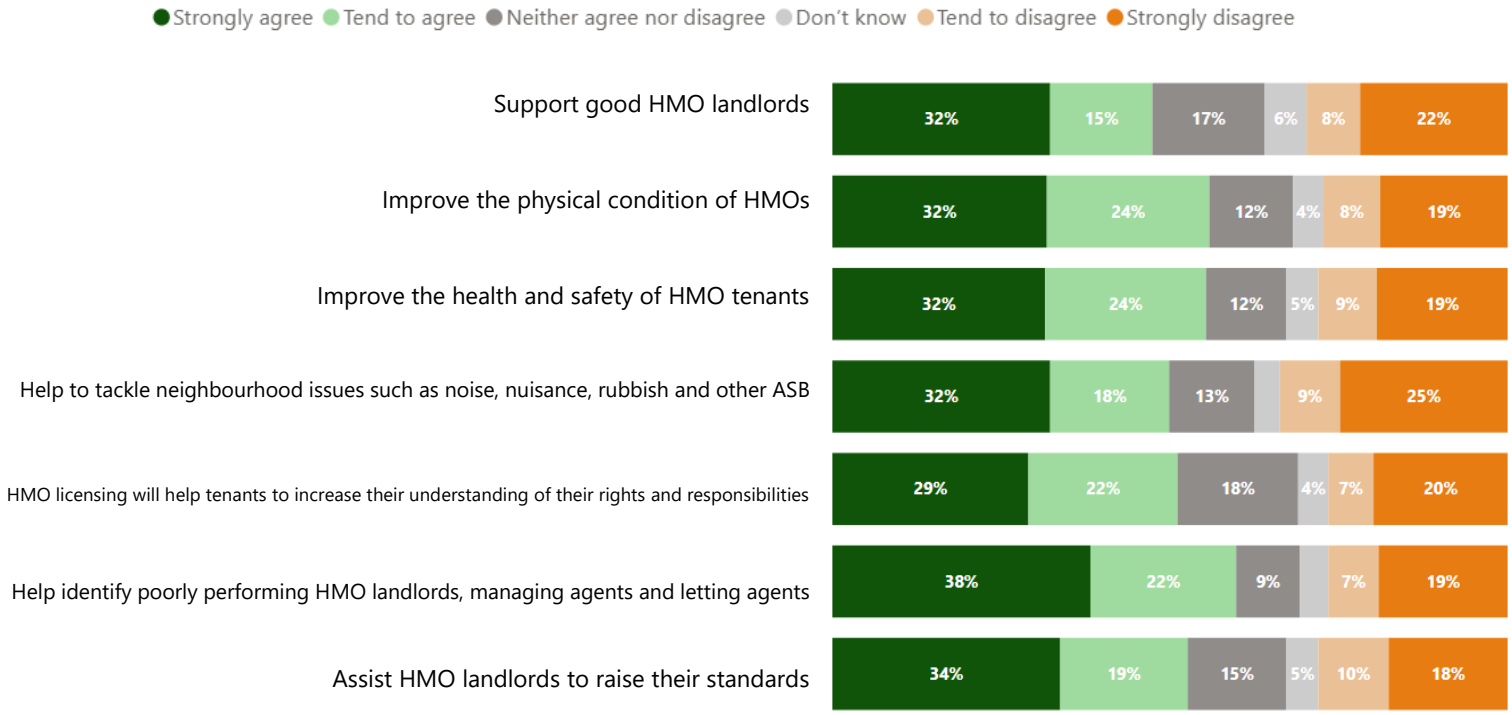


Views on additional HMO licensing scheme outcomes in Havering

Respondents were also asked about their views on whether they thought an additional HMO licensing scheme in Havering would help to achieve certain outcomes.

All **403** respondents answered this question.

To what extent do you agree or disagree that an additional HMO licensing scheme will help to achieve the following outcomes?



The question asked to what extent they agreed that an additional HMO licensing scheme in Havering would help to achieve the following outcomes:

Support good HMO landlords

A majority of respondents, **47** per cent, either agreed or strongly agreed, while **30** per cent either disagreed or strongly disagreed. **23** per cent said they neither agreed nor disagreed or didn't know.

Improve the physical condition of HMOs

The majority of respondents, **56** per cent, either agreed or strongly agreed, while **27** per cent either disagreed or strongly disagreed. Almost **17** per cent said they neither agreed nor disagreed or didn't know.

Improve the health and safety of HMO tenants

The majority of respondents, **56** per cent, either agreed or strongly agreed, while **28** per cent either disagreed or strongly disagreed. **17** per cent said they neither agreed nor disagreed or didn't know.

Help to tackle issues of neighbourhood problems such as noise nuisance, rubbish and other ASB

A majority of respondents, **50** per cent, either agreed or strongly agreed, while **34** per cent either disagreed or strongly disagreed. **16** per cent said they neither agreed nor disagreed or didn't know.

Help tenants to increase their understanding of their rights and responsibilities when living in an HMO

The majority of respondents, **51** per cent, either agreed or strongly agreed, while **27** per cent either disagreed or strongly disagreed. **22** per cent said they neither agreed nor disagreed or didn't know.

Help identify poorly performing HMO landlords, managing agents and letting agents

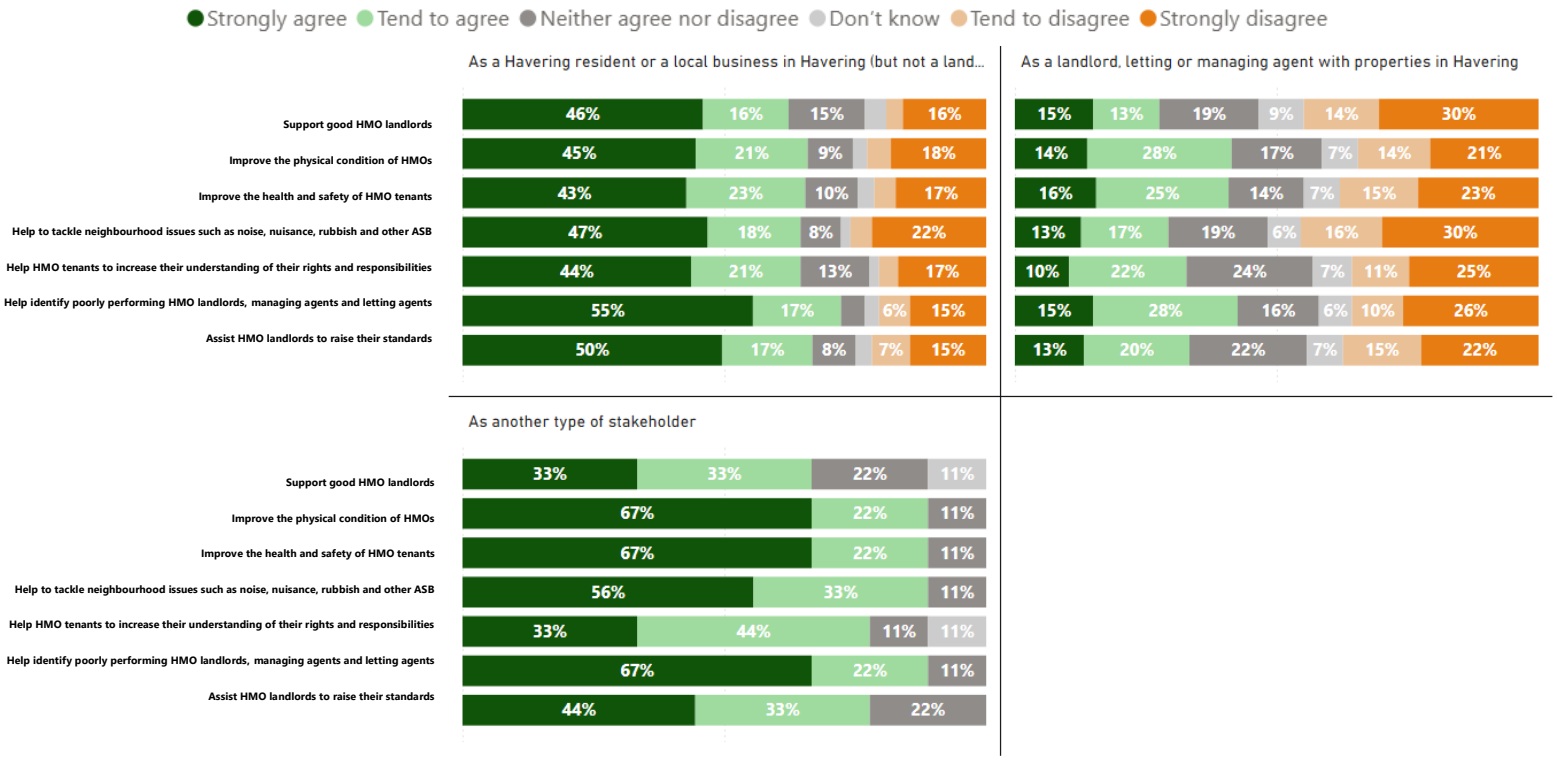
The majority of respondents, **60** per cent, either agreed or strongly agreed, while **26** per cent either disagreed or strongly disagreed. Nearly **14** per cent said they neither agreed nor disagreed or didn't know.

Assist HMO landlords to raise their standards

The majority of respondents, **53** per cent, either agreed or strongly agreed, while **28** per cent either disagreed or strongly disagreed. Nearly **20** per cent said they neither agreed nor disagreed or didn't know.

As is the case with many of the other questions, there is some polarity between the views of landlords, letting and managing agents and those of residents and local businesses and other stakeholders. The stakeholder breakdown is shown in the graphs below.

To what extent do you agree or disagree that an additional HMO licensing scheme will help to achieve the following?



3.14 Alternative solutions, other comments and considerations

Open text responses were also requested to gather additional comments, and to determine whether stakeholders felt that there was anything further that the Council should consider to help improve the condition and management of the PRS in Havering.

A significant number of respondents proposed alternative solutions, such as borough-wide selective schemes, better enforcement of existing laws, and incentives for good landlords. There was also strong sentiment around the impact of HMOs on community cohesion, infrastructure, and property values. Overall, the feedback highlights a desire for a targeted, transparent, and balanced approach that supports responsible landlords while effectively addressing poor housing conditions and anti-social behaviour.

1. *Borough-wide licensing preferred over selective schemes*: many respondents argued that limiting the scheme to certain wards would displace problems and unfairly penalise landlords in specific areas.

> *"The scheme should be borough wide to push rogue landlords out of Havering entirely. Rogue landlords will be incentivised to move to the wards where there is no licensing scheme and the problems with property conditions and ASB will shift to other places."*

> *"I think this scheme should be made borough wide, rather than just individual wards. It will just push the worst landlords to other wards."*

> *"I totally agree with the licensing but find it highly discriminatory and inappropriate that this is being restricted to only certain parts of the borough."*

2. Limit the number of HMOs, which are seen as detrimental to community cohesion and infrastructure: many residents expressed strong opposition to HMOs, citing issues like overcrowding, noise, rubbish, and ASB.

> "HMOs should be discouraged as they are detrimental to the area."

> "I have been forced to move out of the area because the council allowed the other half of my semi-detached house in a lovely road to be made into an HMO."

> "There should not be more than one HMO allowed in a street."

3. Targeted, intelligence-led enforcement: instead of blanket licensing, stakeholders proposed focusing enforcement on known problem areas or landlords with a history of complaints.

> *"Focus on the landlords with complaints and spot check properties belonging to letting agents."*

> *"Adopt a more intelligence-led enforcement strategy that targets properties and landlords with a proven history of substandard conditions or tenant complaints."*

> *"Licenses should be for poorly performing landlords only and not penalise the decent landlords."*

*4. Improve tenant education and reporting mechanisms***:** some respondents recommended empowering tenants with better information and easier ways to report issues.

> *"Encourage tenants to know their rights, they have a choice to take up a tenancy or not."*

> *"Create a direct line service where tenants can report rogue landlords to the Council."*

> *"The council know which properties are rented out, so they can make the renters aware of their rights by emailing them the relevant information/where to access it, this wouldn't cost any money."*

5. Help with problem tenants and evictions: some landlords feel powerless when tenants behave poorly, damage property, or refuse to pay rent. They want faster eviction processes and Council support in managing these situations.

> *"Landlords need protection too…The council must be fair to all parties."*

> *"It's becoming nearly impossible to remove a problematic tenant, even in cases involving drug use, repeated antisocial behaviour, chronic late payment—or no payment at all."*

> *"Landlords can't predict future actions of tenants… It seems to me the Licensing scheme in its iteration seems to be designed to be punitive towards Landlords while not providing support or assisting them with issues arising from problem tenants who are the ones causing a lot of what the licensing scheme is purportedly trying to prevent!"*

> *"Some tenants feel they have a right to abuse a property simply because they are paying rent. If the local authorities had a balanced view in protecting landlords' rights as much as tenants, there would be a fairer marketplace."*

6. Improve Council support and engagement with landlords: some landlords report poor communication and minimal engagement from the Council, even after paying licensing fees. They want meaningful support and recognition for responsible practices.

> *"I have been part of the selective licensing scheme for the past 4 years, and it has made no difference to the way I manage my property or the already high level of accommodation I provide to tenants. Moreover, I've received zero communication from the council during the 4 years that it has been in place - the fee was duly taken and then radio silence."*

> *"The council should do more to support those who are actively contributing to the community—particularly landlords who are generating the income that helps sustain it."*

> *"There is absolutely nothing about the SLL scheme that provides any support or feedback to landlords. It is all stick and no carrots."*

7. Await national reforms and EPC requirement changes: several stakeholders referenced the *Renters Reform Bill, Renters Rights legislation*, and upcoming changes to *EPC ratings* in their responses. These comments reflect concerns about the cumulative regulatory burden on landlords including:

- Increased costs from overlapping national and local schemes.
- Reduced profitability and incentives to remain in the rental market.
- The risk of landlords exiting the sector, reducing housing supply.
- A call for councils to wait for national reforms to take effect before introducing additional local licensing.

> *"The new Renters Rights Bill will require a landlords register. What does you proposed selective licensing add to this register?"*

> *"I also think this is unnecessary due to the removal of section 21 as part of the renters right bill where tenants are better protected and don't have to worry about speaking up and being kicked out."*

> *"The Selective License Scheme does not help the "Good Landlords" in any way. It's simply another Tax which makes landlords reluctant to remain in the market. We have a housing crisis and most of the landlords I know will be considering selling due the renters reform bill and the tax implications so adding another tax/cost is simply going to help make that decision become more likely."*

> *"Quite simply, this new selective license scheme and the pending EPC level increase combined with the renters reform bill will mean a mass exodus of private landlords in the borough…"*

"With the change in taxation and the Renters Reform Bill coming over the horizon we have just had to sell up…"

3.15 Views supporting the proposed schemes

It is worth noting that, although the majority of the free text questions invited responses, these were only when respondents were in disagreement. There were, however, many positive comments about the scheme. Some of these are listed below:

"The parts in Appendix 3 about waste such as giving information about recycling are really good, in line with Re London recommendations."

"Hopefully the licensing schemes will improve the conditions in the private sector. There are some landlords who do not reinvest any rental monies back into the property to prevent health and safety issues."

"Any kind of regulation to support good tenants & ensure landlords are liable is good, as long as enforcement takes place by the authority."

"I think this is an excellent idea. This is the only way to approve conditions for tenants and stop poor properties being rented out."

"I agree with the scheme but in my opinion, it should apply to all areas."

"Licensing, via the conditions ensures the license holder is held accountable… ensures 'rogue' landlords face enforcement action."

"My daughter is in rented accommodation… I still think the licensing adds responsibility, quality, accountability, improvement and security to both sides."

"The sooner these fees are brought in the better."

"Please if any of these new regulations can help us in any way I am completely for it."

"I think it should be rolled out across the whole borough so that expectations are made clear to all."

4. Public meetings and written responses

Havering Council held two virtual public forums to provide information about the proposed schemes and to gather feedback from stakeholders. Feedback was also gathered through formal written responses. Below is a summary of the key themes that came out of the forums and the written submissions.

Council officers also responded to email queries that were sent as part of the consultation.

4.1 Public online forums

The Council, in conjunction with Cadence Innova, held two meetings aimed at engaging with landlords, agents and residents, to make them aware of the consultation and to gather their feedback. There was an online meeting (via Microsoft Teams) which was held on **14 May 2025** with **41** attendees (the actual number of attendees fluctuated during the meeting as attendees joined late or left early), and a further virtual event held on **18 June 2025** with **102** attendees.

Council officers were present at both public forums. Following on from a presentation about the proposals the majority of the meeting was used to undertake a question-and-answer session. Attendees had the opportunity to express their views and ask questions about the proposals. They were able to highlight areas requiring clarification and suggest matters for the council officers to consider. During each public forum, Council officers attempted to address all questions posed by attendees or directed them to the consultation documents for further information (often when there were specific questions about the proposed licence conditions, fees etc).

The main themes of the questions and views expressed were as follows, categorised by theme:

Fees & discounts

How is the £950 for a selective licence justified?

Will the licence fee be passed on to tenants?

Can the fees be paid in instalments over five years?

Why is there no early bird discount this time?

What is the estimated cost of operating the scheme?

Fairness, scope & justification

Why are good landlords being penalised for the actions of rogue landlords?

The selective licensing comes across as punitive towards landlords in wards that are going to be hit by the licensing fee

Would it not be fairer to target those landlords that have repeated offenses?

Why is the scheme not borough-wide if the aim is to improve standards?

Effectiveness & enforcement

What happens if a landlord doesn't apply for a licence?

Will every property be inspected?

What happens if a licence application is unsuccessful?

Landlords with unsatisfactory properties will probably not be on this webinar and will probably not bother to get a license. How will this be followed up?

What guarantee do we have that the licensing scheme will be set up and run correctly by the council?

Evidence and data transparency

Is it possible to see the data behind why these areas have been selected?

How does the data from private landlord complaints compare to council tenant complaints?

What evidence is there that licensing schemes are effective?

How do we request further empirical data is obtained to support this proposal?

Impact on tenants and housing supply

Will this drive up rental prices?

What happens to tenants if a landlord sells due to the scheme?

Are good tenants being penalised too?

Ultimately these costs will be passed on to tenants so this doesn't feel like it will help those who this scheme is designed to help.

Support for landlords

Will there be assistance for smaller landlords?

What happens if tenants damage the property between inspections?

Will the council buy properties from landlords who can't afford to continue?

What schemes are the council going to introduce to support landlords with terrible tenants?

Operational details and application process

How will the relevant landlords be notified of what they need to do and when in terms of registering?

How quickly do you expect to grant a licence?

Will the same 30 days period remain? And what happens if planning is not up to speed?

Legal and planning considerations

Do single households require a licence?

Are Havering able to designate areas as unsuitable for further/new HMOs for example by an Article 4 direction?

Can planning permission still be obtained for HMOs in Article 4 areas?

How does licensing relate to planning enforcement?

In summary, many landlords and agents held strong views and were negative to PRS licensing in general. In particular, they perceived unfairness of the scheme in targeting good landlords and were concerned about the effectiveness of selective licensing schemes and the council's own ability to achieve its objectives. The main objections, however, were to the economic costs of licensing schemes on landlords, which they felt would inevitably be passed onto tenants.

Though a significant number of the attendees were landlords and managing/letting agents, a number of tenants were also among the participants. The views of tenants as a group were difficult to assess in the context of the forum because they did not self-identify when posting questions to the Q&A.

4.2 Written representations

Havering Council received 31 written responses through its email inbox during the consultation period from various stakeholders including residents, landlords and landlord groups including Safeagent, the NRLA and Propertymark. A summary of key themes and concerns is listed below and the three organisations' full submissions are included in Appendix 4.

High cost: *Proposed fees (£1400 for additional, £950 for selective) are considered excessive and may deter investment in the PRS.* **(*Safeagent*)** *Especially affects landlords with larger portfolios in London.* ***(Propertymark)***

Lack of transparency in fee structure: *Safeagent and Propertymark request a detailed cost breakdown to justify the fees and* provide *clarity on total and cumulative costs to the Council.* **(*Safeagent*), *(Propertymark)***

Unfair fee structure: *Charging full fees for licenses granted for less than five years is deemed unreasonable. Pro-rata adjustments are fairer but complex.* **(*Safeagent*)**

Fee waiver suggestion: *Advocates for fee exemptions where landlords assist with homelessness duties.* **(*Safeagent*)**

Insufficient resources: *Concerns that enforcement may be underfunded, especially with the Renters' Rights Bill pending.* **(*Safeagent*)**

Need for joined-up services: *Calls for better coordination between Trading Standards and Private Sector Housing teams.* **(*Safeagent*)**

Unfair expectations: *Argues that agents and landlords should not bear disproportionate responsibility for tackling ASB, occupancy limits, mental health issues or substance abuse among tenants* **(*Safeagent*), (NRLA), *(Propertymark)***

Sector differences ignored: *Warns against equating PRS responsibilities with those of publicly funded social landlords.* **(*Safeagent*)**

Lack of transparency in outcomes: *Calls for regular, detailed reporting on licensing implementation and outcomes, including detailed breakdown of previous scheme.* **(*Safeagent*), (NRLA), *(Propertymark)***

Underutilisation of current powers: *The NRLA implies that better use of existing legislation could achieve desired outcomes without new schemes.* **(NRLA)**

Lack of support for bulky waste removal: *No current mechanism to help landlords dispose of items left by tenants. Other councils (e.g., Leeds) offer complimentary services to licensed landlords, which Havering could emulate.* **(NRLA)**

Lack of clarity for inspections: *No clear plan for property inspections—whether all properties will be inspected, and what methodology (e.g., risk-based or geographic) will be used.* **(NRLA)**

Better alternatives exist: *Suggests using council tax records to identify private rented properties and landlords, which avoids reliance on self-identification and is harder for criminal landlords to evade.* **(NRLA)**

Opposition to licensing as a regulatory tool: *Education-based regulatory frameworks that support landlords in improving property conditions are preferable.* ***(Propertymark)***

Criticism of renewal: *The need to renew the scheme suggests previous objectives were unmet.* ***(Propertymark)***

Duplication: *Overlaps with the proposed national landlord registration scheme in the Renter's Rights Bill.* ***(Propertymark)***

Misattribution of issues: *Some problems may stem from social housing, not the PRS.* ***(Propertymark)***

Call for targeting: *A borough-wide approach to additional HMO licensing is too broad; targeted interventions are recommended.* ***(Propertymark)***

Payment methods and discounts: *Request for clarity on payment methods, including invoicing for agents managing multiple properties. Concern about lack of discounts for landlords with large portfolios.* ***(Propertymark)***

Energy standards: *Concern over future EPC requirements and their impact on landlords. Clarity sought on financial grants or loans for landlords to bring older properties up to standard.* ***(Propertymark)***

Section 21 and tenant management risk-aversion: *Licensing and legislative changes may deter landlords from accepting tenants with less-than-perfect histories.* ***(Propertymark)***

4.3 Letter of support

During the consultation, Havering Council also received a letter in support of the council's proposals to implement the additional HMO sand selective licensing schemes from Harrow Council, drawing on their current experience of implementing property licensing schemes. This letter can be found in Appendix 5.

5. Appendices

- Appendix 1 - Communications and Marketing visuals and analytics
- Appendix 2 – Survey respondent profile
- Appendix 3 – Survey questionnaire
- Appendix 4 – Full written representations
- Appendix 5 – Letter of support

Appendix 1 - Communications and Marketing visuals and analytics



Havering channels

X (Twitter)

Press release





Facebook





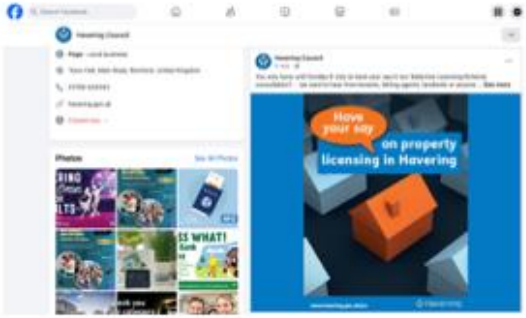
Live Well Havering



Living in Haverin

At the Heart







Children's Centre

Page 294

Online articles



Property 118



The Negotiator

Property 118



London Property Licensing





Romford Recorder

Page 295

Out of home

461,191 impressions



19 sites



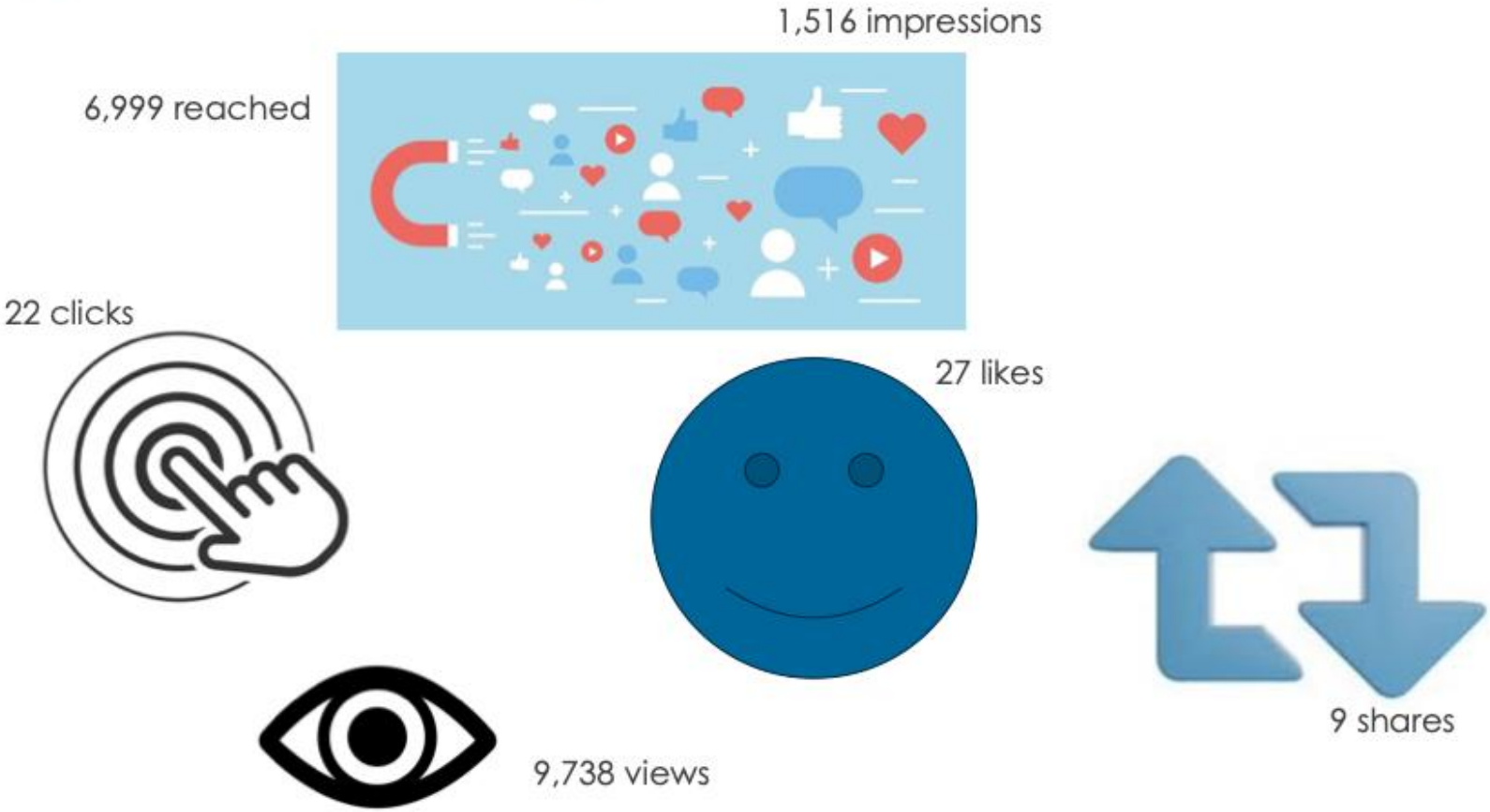




14 days

Six boroughs

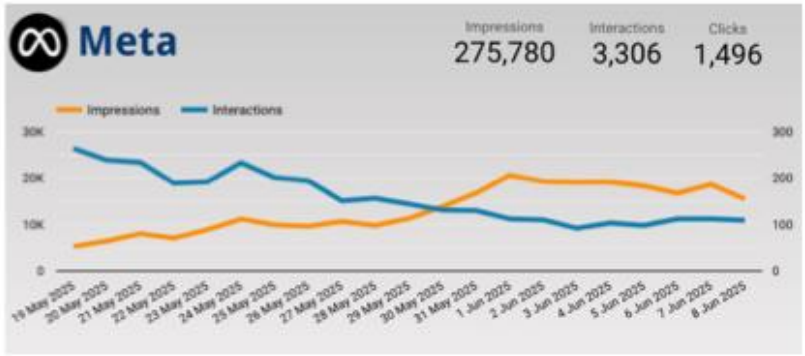
Organic social media analytics



Programmatic campaign analytics









London Property Licensing campaign









Appendix 2 - Survey respondent profile

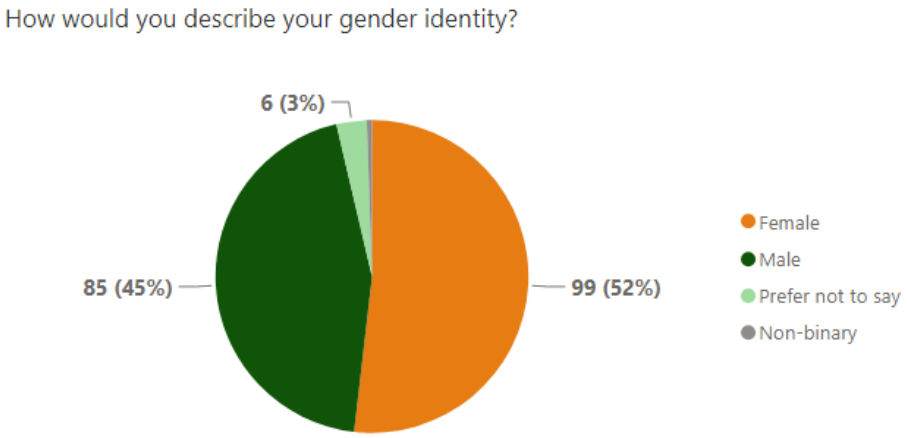
The respondents to the consultation survey were asked if they would give their age range, gender identity, ethnic origin, and disability status. Their responses were compared with benchmarks for the borough using the 2021 census[1].

It is worth noting that for each of these equalities' questions, about half of respondents opted out of the equalities' questions altogether (**211** or **52** percent of all respondents). Of those who opted in to these questions (**192**, or **48** per cent of all respondents), a proportion for each question still chose 'prefer not to say' as their response. Therefore, fully accurate comparisons with the compulsory census data cannot always be made.

1 person who opted in to the equalities' questions chose to answer *only* the question on gender identity, and another, *all but that question*, explaining the total response number of **191** for each of the equalities' questions.

Gender identity

Of the **191** respondents who answered this question, **45** per cent said they were male, **52** per cent said they were female, **0.5** per cent said they were non-binary and nearly **3** per cent preferred not to say.

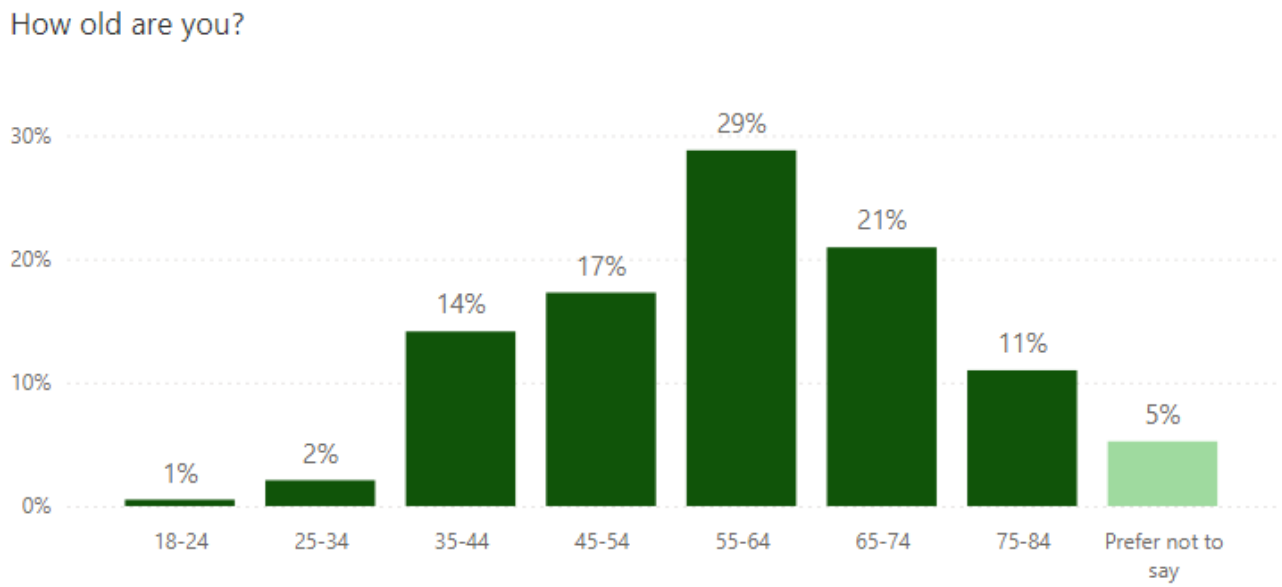


According to the 2021 Census, the population of Havering is **52** per cent female and **48** per cent male, meaning that, among those that chose to answer this question within the survey, men were slightly underrepresented (*though they may equally have chosen the response 'prefer not to say'*). It is worth noting that the comparison with census data is with the question on 'sex', rather than 'gender identity', as gender identity estimates from Census 2021 are official statistics in development. This reflects their innovative nature and the evolving understanding of measuring gender identity, along with the uncertainty associated with these estimates[2].

[1] Census - Office for National Statistics

[2] Sexual orientation and gender identity quality information for Census 2021 - Office for National Statistics (ons.gov.uk)

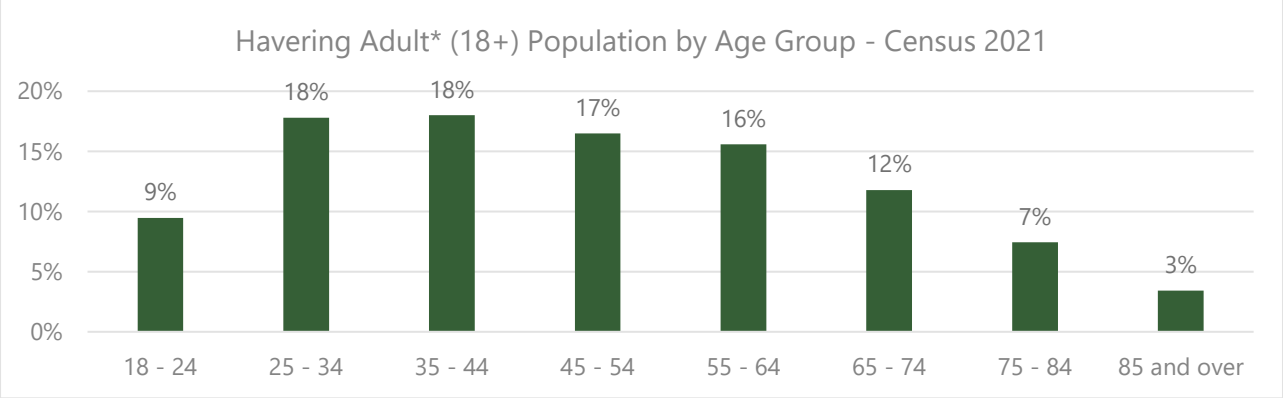
Age



191 respondents answered this question.

The age group of 55 to 64 was the most represented within the consultation, with **55** responses, or about **29** per cent. The age groups 65 to 74 **(40** responses, or **21** per cent) and 45 to 54 (**33** responses, or **17** per cent) were the next largest age-demographic. The age groups 35 to 44 and 75 to 84 made up **14** and **11** per cent respectively, with the lowest proportion of respondents falling into the 25 to 34 and 18 to 24 categories (**2** and **1** per cent respectively). **5** per cent of the **191** respondents to this question preferred not to say.

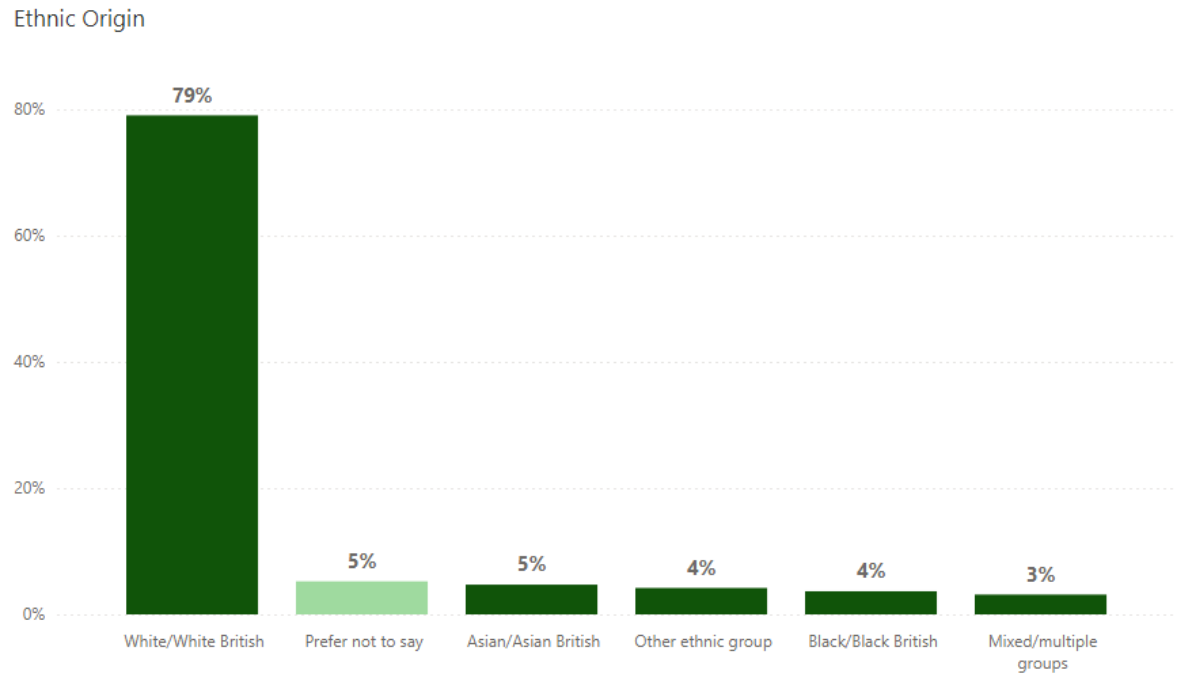
Compared to the Census data for the borough, the 45 to 54 age group is accurately represented in the survey, at **17** per cent compared to the **17** per cent Census figure. The older demographics, 55 to 64, 65 to 74 and 75 to 84 age groups, are all overrepresented at **29, 21** and **11** per cent respectively (compared to the Census figures of **16**, **12** and **7** per cent). All younger demographics (18 to 44) are underrepresented in the survey compared to the Census figures.



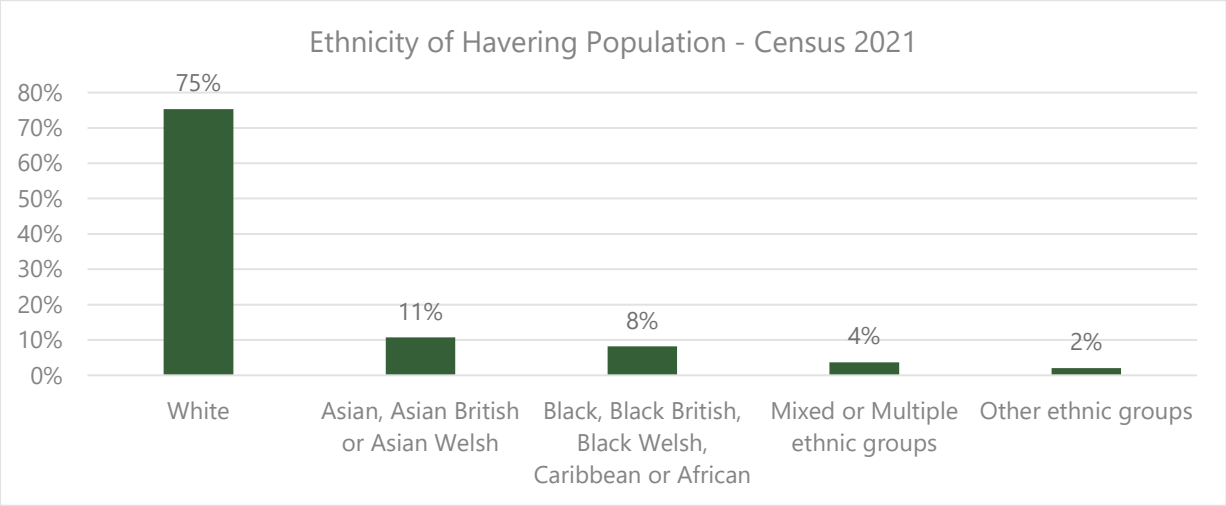
*Please note that the Census figures are the percentage of the adult, over 18-year-old usual resident population in Havering and excludes the under-18 population.

Ethnic origin

Respondents were asked about their ethnic origin, or the group to which they perceived they belonged. **191** respondents chose to answer this question.



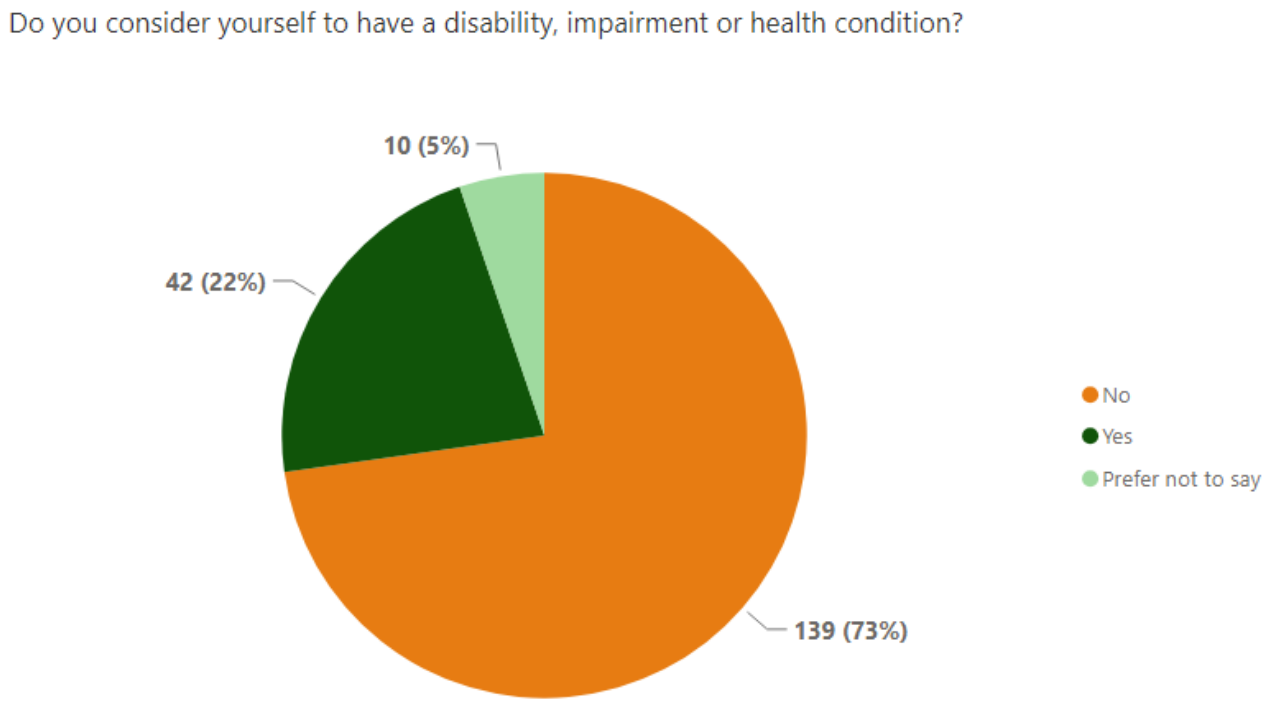
The 2021 Census results for Havering regarding ethnic groups are shown below:



Of those who chose to give an ethnic group, the largest group of consultation respondents were people of white/white British ethnic origin (**79** per cent), which is slightly above the borough's demographic figure of **75** per cent. The proportions of Asian/Asian British (**5** per cent) and black/black British (**4** per cent) are below the borough's demographic figures of **11** per cent and **8** per cent respectively. The proportions of mixed/multiple and 'other' ethnic groups were closer to the borough census figures.

Disability or long-term health condition

Respondents were also asked if they considered themselves to have a disability, impairment or health condition. **191** respondents chose to answer this question.



A small proportion (**5** per cent) of those who answered the question gave the response 'prefer not to say'.

22 per cent of the respondents to the question said they considered themselves to have a disability, impairment or health condition, which is above the **15** per cent of Havering residents who, in the 2021 census, stated that they had a disability that affects their day-to-day activities a little or a lot.

Property Licensing

LB Havering Selective and Additional Licensing Consultation Questionnaire

YOUR PRIVACY

All the information you provide will be treated in strict confidence, will only be used for the purposes of this consultation and will only be shared with Cadence Innova who have been appointed by the council as consultants on this project.

Following the consultation a public report will be produced in which feedback from individual members of the public will be anonymous, but views from organisations may be attributed in full.

You can read the Council's Privacy Notice here: Havering data privacy notice and your information rights | Data protection | London Borough of Havering

YOUR CONNECTION TO THE BOROUGH OF HAVERING

In what capacity are you responding to this survey?

PLEASE TICK ONLY ONE BOX THAT APPLIES TO YOU

☐	**As a Havering resident or a local business in Havering (but not a landlord)** *– please answer the red shaded question overleaf, then go to the 'Local Issues?' section*
☐	**As a landlord, letting or managing agent with properties in Havering** – *please answer the blue shaded section overleaf, then go to the 'Local Issues?' section*
☐	**As another type of stakeholder** – *please answer the green shaded section overleaf, and following questions*

Please provide the following information about yourself (where relevant) so that we can monitor the representativeness of the responses and identify trends. We will take all feedback into account, regardless of whether you provide your personal details.

INFORMATION ABOUT YOU: HAVERING RESIDENTS & BUSINESSES

If you are a resident living in Havering, or responding on behalf of a local business in Havering, which of the following best describes you? PLEASE TICK ONE BOX ONLY

☐	Private tenant living in a single-family dwelling (e.g. a self-contained flat or house)
☐	Private tenant living in a House in Multiple Occupation (HMO) or bedsit where you share some basic amenities (e.g. toilet, bathroom, kitchen) with others
☐	Havering Council tenant
☐	Housing association tenant
☐	Owner occupier
☐	Shared owner – with a share in the equity of the home
☐	Local business in Havering (but not a landlord)

☐ Other (please specify below)

INFORMATION ABOUT YOU: LANDLORDS AND AGENTS

If you are a landlord or agent with properties in Havering, which of the following best describes you? PLEASE TICK ONE BOX ONLY

☐	Landlord who manages their own property	☐	Managing agent
☐	Landlord who uses a managing agent	☐	Registered social landlord
☐	Letting agent	☐	Other (please specify below)

Do you live in Havering?

☐	Yes	☐	No

Please indicate how many properties you own/manage in Havering, for each of the following types. PLEASE TICK ONE BOX FOR EACH TYPE OF PROPERTY

	0	1	2-10	11-50	51-100	101+
Single family occupancy house/bungalow	☐	☐	☐	☐	☐	☐
Self-contained flat converted	☐	☐	☐	☐	☐	☐
Self-contained flat purpose built	☐	☐	☐	☐	☐	☐
House in Multiple Occupation (three or more people)	☐	☐	☐	☐	☐	☐

Are you accredited or a member of any of the following? PLEASE TICK ALL THAT APPLY

☐	National Residential Landlords Association (NRLA)	☐	ARLA Propertymark
☐	London Landlord Accreditation Scheme (LLAS)	☐	Royal Institution of Chartered Surveyors (RICS)
☐	UK Association of Letting Agents (UKALA)	☐	Other landlord/letting agent association ☐
☐	Safeagent	☐	No

INFORMATION ABOUT YOU: ORGANISATIONS AND OTHER STAKEHOLDERS

If you are responding on behalf of an organisation, which organisation do you represent?
PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

Please give us the name of the organisation and any specific group or department. Please also tell us who the organisation represents, what area it covers and how you gathered the views of members.

If you are another stakeholder (e.g. with links to a neighbouring borough), please use the box below to provide full details. PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

LOCAL ISSUES?

To what extent do you believe each of the following to be a problem in your local area of Havering? PLEASE TICK ONE BOX IN EACH ROW

	Not a problem at all	Not a very big problem	A fairly big problem	A very big problem
Poor property conditions	☐	☐	☐	☐
Anti-social behaviour (ASB)	☐	☐	☐	☐

Thinking about the private rented sector as a whole in Havering, to what extent do you agree or disagree with the following statements? PLEASE TICK ONE BOX FOR EACH STATEMENT

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree
The number of private rented properties has been increasing in Havering	☐	☐	☐	☐	☐
The physical condition of private rented properties is a problem	☐	☐	☐	☐	☐
There are health and safety issues with private rented properties	☐	☐	☐	☐	☐
Overcrowding is a problem in private rented properties	☐	☐	☐	☐	☐
There are inadequate fire safety measures in private rented properties	☐	☐	☐	☐	☐
The private rented sector causes neighbourhood problems such as noise, nuisance, rubbish and other antisocial behaviour	☐	☐	☐	☐	☐
Poorly **maintained** private rented properties are contributing to the decline of some areas in Havering	☐	☐	☐	☐	☐
Poorly **managed** private rented properties are contributing to the decline of some areas of Havering	☐	☐	☐	☐	☐
Landlords of private rented properties have a responsibility to manage their properties effectively	☐	☐	☐	☐	☐
To help with the management of private rented properties in the borough, landlords should be 'fit and proper' persons *(e.g. have proper management or financial arrangements in place, and not*	☐	☐	☐	☐	☐

have convictions for certain types of offences)					

ADDITIONAL HMO LICENSING SCHEME

Havering Council, like all other councils across the country, must operate a mandatory licensing scheme for larger HMOs.

We are proposing to introduce a borough-wide additional HMO licensing scheme that will cover smaller HMOs that are occupied by three or four unrelated people in two or more households that share (or lack) toilet, washing or cooking facilities.

By implementing an additional HMO licensing scheme, the council is able to effectively deal with the poor conditions and anti-social behaviour present in smaller HMOs by requiring landlords to license their property with the council and meet certain property management conditions.

Landlords will need to obtain a licence for an HMO falling within the new scheme. A fee is charged by the council to cover the costs of processing an application, monitoring compliance with licence conditions and enforcing the scheme.

The additional HMO licensing scheme, if approved, would begin in January 2026 and would operate for five years. You can find out more about the proposed additional HMO licensing scheme at https://www.havering.gov.uk/PRS (see Evidence Pack)

To what extent do you agree or disagree with the proposal for a boroughwide additional HMO licensing scheme in Havering? PLEASE TICK ONE BOX ONLY

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
☐	☐	☐	☐	☐	☐

To what extent do you agree or disagree that an additional HMO licensing scheme will help to achieve the following outcomes? PLEASE TICK ONE BOX FOR EACH STATEMENT

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
Improve the physical condition of HMOs	☐	☐	☐	☐	☐	☐

Improve the health and safety of HMO tenants	☐	☐	☐	☐	☐	☐
Help to tackle neighbourhood issues such as noise, nuisance, rubbish and other antisocial behaviour	☐	☐	☐	☐	☐	☐
Help tenants to increase their understanding of their rights and responsibilities when living in an HMO	☐	☐	☐	☐	☐	☐
Help identify poorly performing HMO landlords, managing agents and letting agents	☐	☐	☐	☐	☐	☐
Assist HMO landlords to raise their standards	☐	☐	☐	☐	☐	☐
Support good HMO landlords	☐	☐	☐	☐	☐	☐

If you disagree with the proposals for an additional HMO licensing scheme, please can you explain why and what alternatives you think should be considered to address the problems?

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

ADDITIONAL HMO LICENCE CONDITIONS

If an additional HMO licensing scheme is introduced, all landlords will be required to obtain a licence for any properties meeting the additional HMO criteria. The licence can contain two types of conditions: mandatory and discretionary.

The mandatory conditions are those relating to electrical, gas and fire safety, tenancy agreements, minimum sleeping room sizes and the disposal of household waste. These are required by law and must be applied. These mandatory conditions do not form part of the consultation.

The discretionary conditions are part of the consultation, and the council can decide on these in order to deal with the management, use and occupation of the licensed property and its condition and contents. You can find out more about the proposed additional HMO licensing scheme conditions at https://www.havering.gov.uk/PRS (see Evidence Pack Appendix 2)

To what extent do you agree or disagree with the proposed additional HMO licensing discretionary conditions? PLEASE TICK ONE BOX ONLY

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
☐	☐	☐	☐	☐	☐

If you disagree with any of the discretionary conditions for additional HMO licensing please can you explain why?

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

Are there any other additional licence conditions (that are not already covered by a mandatory or proposed discretionary licence conditions) that you think should be included? If 'Yes', please state below

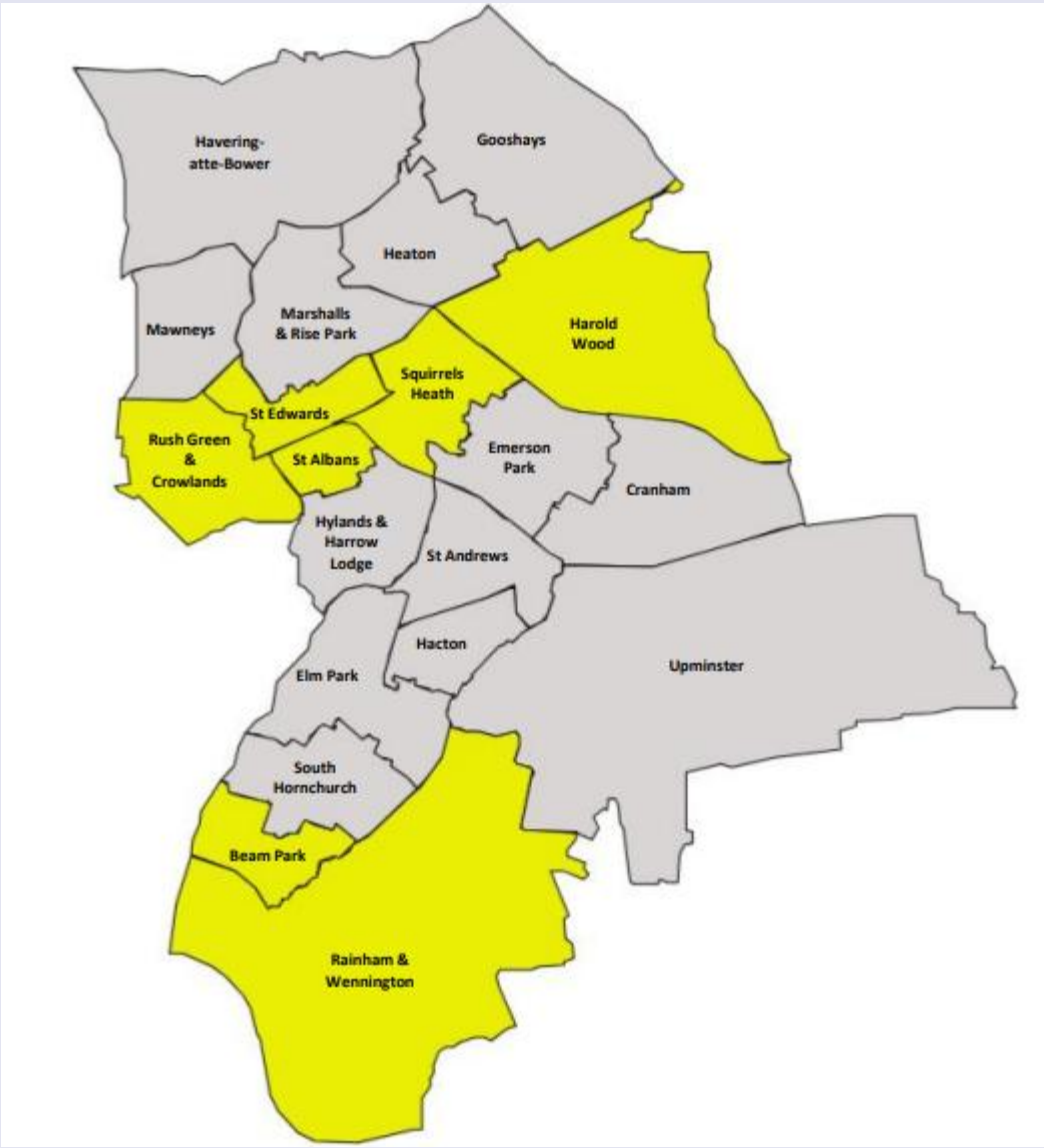
Yes	No	Don't know
☐	☐	☐

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

SELECTIVE LICENSING SCHEMES

The council is proposing to introduce a selective licensing scheme for all privately rented homes in seven wards. These wards have been chosen because they have high levels of privately rented accommodation which is in poor condition. By implementing a selective licensing scheme, the council is able to effectively deal with the poor conditions by requiring landlords to license their property with the council and meet certain property management conditions.

If approved, it is proposed that the scheme will be introduced in **January 2026**.



If the scheme is implemented, landlords will be required to apply to the council for a licence for each privately rented property they own or manage in the area. Each licence application must be accompanied by a licence fee. Conditions will be attached to each licence and landlords would be bound by these conditions.

You can find out more about the proposed selective licensing scheme at https://havering.gov.uk/PRS (see Evidence Pack)

To what extent do you agree or disagree with the proposal for a selective licensing scheme in the seven wards? PLEASE TICK ONE BOX ONLY

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
☐	☐	☐	☐	☐	☐

To what extent do you agree or disagree that a selective licensing scheme will help to achieve the following outcomes? PLEASE TICK ONE BOX FOR EACH STATEMENT

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
Improve the physical condition of private rented properties	☐	☐	☐	☐	☐	☐
Improve the health and safety of tenants	☐	☐	☐	☐	☐	☐
Help to tackle neighbourhood issues such as noise, nuisance, rubbish and other antisocial behaviour	☐	☐	☐	☐	☐	☐
Help to decrease the effects of deprivation (poverty) in the area	☐	☐	☐	☐	☐	☐
Help identify poorly performing landlords, managing agents and letting agents	☐	☐	☐	☐	☐	☐

Assist landlords to raise their standards	☐	☐	☐	☐	☐	☐
Support good landlords	☐	☐	☐	☐	☐	☐

If you disagree with any of the above, please can you explain why and what alternatives you think should be considered to address the problems?

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

SELECTIVE LICENCE CONDITIONS

If a selective licensing scheme is introduced, all landlords will be required to obtain a licence for properties meeting the selective licensing criteria. The licence can contain two types of conditions: mandatory and discretionary.

The mandatory conditions are those relating to electrical, gas and fire safety, tenancy agreements and references. These are required by law and must be applied. These mandatory conditions do not form part of the consultation.

The discretionary conditions are part of the consultation, and the council can decide on these in order to deal with the management, use and occupation of the licensed property. You can find out more about the proposed selective licensing scheme conditions at https://www.havering.gov.uk/PRS (see Evidence Pack Appendix 3)

To what extent do you agree or disagree with the proposed selective licensing discretionary conditions?

PLEASE TICK ONE BOX ONLY

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
☐	☐	☐	☐	☐	☐

If you disagree with any of the discretionary conditions for selective licensing, please can you explain why?

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

Are there any other selective licence conditions (that are not already covered by a mandatory or proposed discretionary licence conditions) that you think should be included? If 'Yes', please state below

Yes	No	Don't know
☐	☐	☐

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

LICENSING SCHEME FEES

The Housing Act 2004 permits the council to set licensing fees to cover the costs of administering the licensing scheme over five years. Licence fees cannot be used elsewhere in the council or used to generate a profit. As long as the licence conditions are complied with, the licence would remain valid up to a maximum of five years.

The council's proposed fees per property licence are below. The law requires that the payment is collected in two parts. The initial part of the fee (Part A) is charged to cover the cost of processing the application. If the application for a licence is successful, the remainder of the fee (Part B) will be charged before the full licence is issued. This part of the fee is a contribution to the other costs incurred by the council in running and administering the licensing scheme, for example the cost to the council for enforcement of licences. The licence fee will be kept under review at least annually.

You can find out more about the proposed licensing scheme fees, charges and discounts at https://www.havering.gov.uk/PRS (see Evidence Pack Appendix 4)

Scheme	Part A	Part B	Total
Additional HMO	£840	£560	£1400
Selective	£570	£380	£950

What are your views on the proposed additional HMO licensing fee?

PLEASE TICK ONE BOX ONLY

I think the fee is too high	I think the fee is at about the right level	I think the fee is too low	Don't know
☐	☐	☐	☐

What are your views on the proposed selective licensing fee?

PLEASE TICK ONE BOX ONLY

I think the fee is too high	I think the fee is at about the right level	I think the fee is too low	Don't know
☐	☐	☐	☐

LICENCE FEE DISCOUNTS

The council is proposing five different discount payments against the full licence fee. Some properties will be eligible for multiple discounts: Please refer to schedule of fees, charges and discounts for more information (Evidence Pack Appendix 4).

Nature of discount	Amount (Selective)	Amount (Additional)
Multi-dwelling	£100 off Part A	£100 off Part A
EPC rating C and above	£75 off Part B	£75 off Part B
Accredited Landlord	£100 off Part B	£100 off Part B

All discounts are at the discretion of the council and will be kept under annual review.

What are your views on the proposed discounts?

PLEASE TICK ONE BOX ONLY

	I think the discount is too low	I think the discount is at about the right level	I think the discount is too high	Don't know
Multi-dwelling	☐	☐	☐	☐
EPC rating C and above	☐	☐	☐	☐
Accredited Landlord	☐	☐	☐	☐

LICENSING SCHEME OBJECTIVES

As part of the planning process for any private property licensing scheme, the council must define its objectives for the schemes and set out how it plans to enforce these.

You can find out more about the proposed licensing scheme objectives at https://www.havering.gov.uk/PRS (see Evidence Pack)

To what extent do you agree or disagree with the proposed licensing scheme objectives? PLEASE TICK ONE BOX ONLY

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
☐	☐	☐	☐	☐	☐

If you disagree with any of the objectives for the licensing scheme, please can you explain why?

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

Are there any other licence scheme objectives (that are not already covered by the objectives listed) that you think should be included? If 'Yes', please state below

Yes	No	Don't know
☐	☐	☐

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

DO YOU HAVE ANY FURTHER COMMENTS?

Is there anything else you think the council should consider to help improve the condition and management of the private rented sector in Havering? Are there any other comments that you would like to make about the proposed additional HMO and/or selective licensing schemes?

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

LICENSING DESIGNATIONS

Havering Council is legally obliged to offer to send you a copy of the licensing designation(s) before any licensing scheme is introduced. These are supporting documents that define various things including the area where licensing will be required, as well as detailing the commencement and duration of the designation(s).

Please be aware that Havering Council are the data controllers but not the data processors for this survey. Any contact details you provided will be separated from your survey response therefore you will not be identified in the results and report of findings received by the council. We will not pass your details on to any third parties. The council's Data Protection Officer can be contacted via dpo@havering.gov.uk

Your contact details will be used by Havering Council only for the purpose of the notification under the Housing Act 2004, and of issuing the licensing designation(s), as required to fulfil the council's duties under Regulation 9 (3) - The Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006 – the publication requirements relating to designations made under the Housing Act 2004, require that within two weeks of a designation being confirmed or made, the local housing authority must send a copy of the notice to any person who responded to the consultation.

The contact information will not be shared, shall be retained for no more than three years after decisions have been finalised, and shall be processed in adherence to your legal rights, including but not limited to the right to withdraw consent, right to copies of your information and right to be forgotten. If you are dissatisfied with the processing of your information, you can raise your concern with the council's Data Protection Officer. You have a right to lodge a complaint with the Information Commissioner's Office (www.ico.org.uk). Further information can be found at Havering Data Privacy Notice and Information Rights

Please provide your name with either an email or postal address if you would like to receive a copy of the licensing designation(s)

Full name

Email address

Postal address

MORE INFORMATION ABOUT YOU

What is the first part of your postcode?
(e.g. RM1 or RM14)
This will help us understand views in different areas

☐☐☐☐

Havering Council has a duty to promote equality and want to make sure all parts of the community are included in this consultation, but these questions are optional. All consultation responses will be taken fully into account when making decisions, regardless of whether you provide your details.

If you consider yourself disabled, please tick the box(es) below that best describe your impairment. This information helps us improve access to our services

☐ Sensory - e.g. mild deafness; partially sighted; blindness

☐ Physical - e.g. wheelchair user

☐ Mental Illness - e.g. bi-polar disorder; schizophrenia; depression

☐ Development or Educational - e.g. autistic spectrum disorders (ASD); dyslexia and dyspraxia, neurodiversity

☐ Learning Disability / Condition - e.g. Down's syndrome; Cerebral palsy

☐ Long-term Illness / Health Condition - e.g. cancer, HIV, diabetes, chronic heart disease, stroke

☐ Other

How did you hear about this consultation?
(tick all that apply)

☐ Leaflet
☐ Email
☐ Poster
☐ Havering website
☐ Local newspaper
☐ Word of mouth

☐ Other *(please specify below)*

How long have you owned property in Havering?

☐ Less than one year
☐ 1 - 2 years
☐ 3 - 5 years
☐ 6 - 10 years
☐ 10+ years
☐ Not applicable

Appendix 4 - Full written representations

Safeagent



HAVERING COUNCIL'S SELECTIVE AND ADDITIONAL LICENSING PROPOSALS

A RESPONSE TO THE CONSULTATION FROM SAFEAGENT – JULY 2025

AN INTRODUCTION TO SAFEAGENT

safeagent www.safeagents.co.uk is a UK wide, not for profit accreditation scheme for lettings and management agents operating in the Private Rented Sector (PRS)

safeagent firms are required to:

- deliver defined standards of customer service
- operate within strict client accounting standards
- maintain a separate client bank account
- be included under a Client Money Protection Scheme

Firms must provide evidence that they continue to meet **safeagent** criteria on an annual basis, in order to retain their accreditation. The scheme includes 1700 firms, with over 2500 offices.

safeagent is an accredited training provider under the Rent Smart Wales scheme and meets the requirements for training of agents under the Scottish Government Register. **safeagent** also operates a Government approved Client Money Protection Scheme.

SAFEAGENT AND LICENSING

safeagent is supportive of initiatives such as Selective and Additional Licensing, providing they are implemented in a way that takes account of the Private Rented Sector (PRS)'s own efforts to promote high standards.

safeagent believes that positive engagement with voluntary schemes and the representative bodies of landlords and agents (such as **safeagent**) is essential to the success of initiatives such as Selective Licensing. We are mindful that the operational problems associated with lack of such engagement have been highlighted in the House of Commons Communities and Local Government Committee report "The Private Rented Sector - First Report of Session 2013–14" (50.pdf (parliament.uk)

The same note sets out how important it is for licensing schemes to avoid being burdensome. We believe that promoting voluntary schemes - and offering discounted licence fees to accredited landlords and agents, can help to achieve this. Voluntary schemes often require members to observe standards that are at least compatible with (and are often over and above) those of licensing schemes. We believe, therefore, that if Havering Council were to allow discounts based on membership of **safeagent** (as well as other similar bodies) implementing and policing the licensing scheme would ultimately be less costly and more effective, allowing resources to be concentrated in the areas where they are most needed.

This is a commonly accepted approach by many English Local Authorities. We would further point out that, in Wales, the Welsh Government has recently recognised the importance of

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membership of specified bodies such as **safeagent** and is offering discounted fees to members as a consequence https://www.rentsmart.gov.wales/en/

PROMOTING PROFESSIONALISM IN THE PRS - THE ROLE OF AGENTS

safeagent's engagement around the country, with various local authorities, suggests that lettings and management agents have a key role to play in making licensing, accreditation and other, often voluntary regulatory schemes work effectively. Agents tend to handle relatively large portfolios of properties, certainly when compared to small landlords. They tend, therefore, to be in a position to gain an understanding of licensing based on wider experience. They become expert in trouble shooting and ensuring that the balance of responsibilities between the agent and the landlord is clearly understood. This, amongst other things, can help to prevent non-compliance due to misunderstandings about local licensing arrangements.

Since October 2014, it has been a requirement for all letting agents and property managers to belong to a government-approved redress scheme. In May 2015, new legislation required agents to display all relevant fees, the redress scheme they belong to and whether they belong to a client money protection scheme. On 1 April 2019, new legislation required letting agents and property managers that hold client money to be members of a government approved client money protection scheme.

At **safeagent** we operate one of the six government approved Client Money Protection Schemes. **safeagent** ensures its members maintain defined service standards, have Client Money Protection arrangements in place, keep separate client accounts and comply with their legal obligation to be a member of a redress scheme. We also have an extensive online training offering to support their professional development. All this can be of assistance to councils who are trying to drive up standards in the PRS.

To assist councils in regulating the private rented sector and effectively utilising their enforcement powers, we have developed an Effective Enforcement Toolkit. Originally published in June 2016, the second edition was published in 2018. The third and most recent edition of the **safeagent** Effective Enforcement Toolkit, developed in conjunction with London Trading Standards, was published in 2021. It can be downloaded free of charge from our website:
https://safeagents.co.uk/wp-content/uploads/2021/11/safeagent-Effective-Enforcement-Toolkit-2021.pdf

HAVERING COUNCIL'S PROPOSALS - SPECIFIC ISSUES

Resourcing Enforcement

Robust enforcement will be essential to the success of any licensing scheme, be it Additional or Selective. Tenants will need to be confident that any enforcement action required has been (or soon will be) carried out in respect of all licensed properties. Local Authorities should be resourced to take action against lettings agents who are not part of a Client Money Protection Scheme. They should also promote the role of the relevant redress schemes to tenants of agent managed properties, taking enforcement action where an agent is not a member.

With the Renters' Rights Bill making its way through parliament, we at **safeagent** are calling on the government to make sure that Local Authority enforcement is properly resourced. We also see it as essential that there is joined up thinking between local Trading Standards services and Private Sector Housing teams. Any new powers must be backed up by the human and technical resources required to implement them. Working in partnership with

accrediting bodies and their members, it should then be possible to ensure standards across the whole of the PRS.

Partnership Working with Lettings and Management Agents

We would urge Havering Council to work closely with accredited lettings & management agents to ensure that the regulatory effort associated with the licensing schemes is focussed on the greatest risks. The highest priority should be tackling rogue landlords and agents (including "*the minority of 'rogue' landlords who fail to invest in their properties*" referred to in the evidence document) not policing the compliant.

Many rogue landlords and unaccredited agents operate "under the radar". Resources should, therefore, be directed towards these serious cases. There is danger that too much time will be spent on those properties and landlords where an existing, reputable agent is best placed to ensure compliance with license conditions.

We welcome the council's stated intention to *"work with landlords to help support them and build their professionalism"*. In pursuit of this aim, we would urge the council to fully recognise the compliance work reputable agents carry out as part of their day to day activities. We would also suggest that the council work closely with accredited agents, to proactively seek out and identify unlicensed properties.

Licensing Fees

The proposed fees of £1400 (Additional) and £950 (Selective) seem high. These sums will place considerable financial burdens on landlords that, together with the cost of compliance with the licensing schemes, may result in a significant disincentive to continued investment in the PRS. In this context, we would welcome sight of a detailed cost breakdown which would justify these figures, similar to the example we attach in our covering email.

We are pleased to note, however, that discounts are available to landlords or agents who are members of nationally recognised professional associations. We are supportive of this approach and pleased to note that **safeagent** is listed as a recognised scheme.

We would suggest that this is justified because **safeagent** members and the landlords who engage them are less likely to be non-compliant, thus reducing costs to the council. We would also suggest that **safeagent** membership mitigates the need for full compliance visits to be carried out by the council. For example, the timing and content of visits could be risk based, recognising that the risk of non-compliance is much lower in the case of properties managed by **safeagent** agents.

In our detailed comments below, we point out some of the areas where compliance with key licencing conditions is an inherent part of the **safeagent** scheme.

Applications made within the Designation Period and Changes in License Holder

We understand from the consultation event that all licenses will be granted for a full five years. It should be clarified that any licenses granted during the designation period (including licenses granted following a change of license holder) will remain valid when the designation is renewed or comes to an end. It should also be made clear that, if a designation comes to an end, inspections and resultant remedial actions should continue to be in operation until all licenses have expired.

We have found that some local authorities charge the full license fee for periods of less than five years. In our view, that is neither fair nor reasonable. A small number of authorities make pro-rata fee adjustments. This is arguably fair but seems unduly complex.

Fee Waiver – Tackling Homelessness

We would suggest that, in cases where a private landlord is assisting the council by offering temporary or permanent accommodation to meet homelessness duties (or otherwise assist with meeting the aims of a homelessness strategy) license applications should be accepted without any fee being payable.

Empty Properties

We believe that selective and additional licensing has the potential to help increase the number of empty homes brought back into use and improved to modern standards, thus improving their potential to be let.

Lettings & management agents can assist with all this. For example, many lettings & management agents will know of empty properties in their localities of operation. Furthermore, they will sometimes have detailed local knowledge and might be able to help the council to categorise the empty property appropriately (under 6 months, over 6 months, probate, exempt, second home etc)

Agents will often be in contact with neighbours and may:

- know if the empty property is causing problems (in some cases agents' tenants and even the agents themselves may have complained) and
- be able to help the council to find relevant contact details. This will help to raise the quality of the council's data – and contribute to the prioritisation of actions.

Furthermore, agents may be able to help to bring the property back into the PRS, working with the council to allocate it to homeless people where appropriate.

LICENCE CONDITIONS

Tenant Referencing

We are supportive of the requirement that references should be obtained for prospective tenants.

Tenancy Management

safeagent agents are expected provide and fill in a tenancy agreement on behalf of the landlord. they will always make sure the terms of the tenancy are fair and help the tenant to understand the agreement.

They will always provide clear information to the tenant about any pre-tenancy payments and what these cover. They will explain any requirement for a guarantor and what the guarantor role entails.

At the end of a tenancy, they will always serve the tenant with the correct period of notice as set out in the tenancy agreement.

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Under **safeagent's** service standards, agents are required to take a deposit to protect against possible damage. They are required to explain the basis on which the deposit is being held and the purpose for which it is required, as well as to confirm the deposit protection arrangements. When joining **safeagent**, agents are asked to provide details of the number and value of the deposits they have registered with the scheme.

Agents are asked to authorise **safeagent** to contact the scheme to verify this information.

During the course of a tenancy, **safeagent** agents will check the condition of the property and draw up a schedule to outline any deductions to be made from the tenant's deposit. They will return the deposit in line with timescales and processes required by the statutory tenancy deposit schemes. **safeagent** agents are also required to:

- have a designated client account with the bank
- operate to strictly defined Accounting Standards
- be part of a mandatory Client Money Protection Scheme.

These requirements provide additional security for client monies held, over and above the requirements of the council's licensing scheme. Again, this is an area where increased **safeagent** membership would be of benefit to the council and local tenants.

Licence Conditions Relating to the Property

We welcome Havering Council's drive to improve property standards. We believe that **safeagent**'s standards go a long way to ensuring compliance with license conditions.

Under **safeagent**'s service standards, **safeagent** agents are expected to visit any property to be let with the landlord and advise on any action needed before letting the property. This includes any repairs and refurbishments needed to put it into a fit state for letting. They will also go with possible new tenants to view unoccupied property. Tenants can, therefore, be confident that **safeagent** agents have provided advice to the landlord concerning any repairs or refurbishments which are necessary.

safeagent agents are expected to explain both the landlord's and the tenant's the rights and responsibilities. To guard against misunderstandings, they will arrange for the preparation of a schedule of the condition of the property.

safeagent agents are required to ensure that tenants are provided with copies of safety certificates on gas and electrical appliances before they commit to the tenancy. They will provide details of the condition of the property, plus a list of its contents. The property will have undergone all required safety checks on furnishings, and gas and electrical services.

Thereafter, **safeagent's** standards require agents to carry out property inspections periodically, as agreed with the landlord, in line with normal good practice. **safeagent** and our firms would anticipate inspections to be carried out every 6 months as a minimum, to identify any problems relating to the condition and management of the property. In line with common practice, records of such inspections would contain a log of who carried out the inspection, the date and time of inspection and issues found and action(s) taken. Under a licensing scheme, this information could be shared with the council in an appropriate format.

Tenants will be fully aware of access arrangements. **safeagent** agents are expected to arrange in advance a time for access, in order to inspect the condition of the property in accordance with the tenancy agreement. **safeagent** agents will arrange to have routine

maintenance work carried out, up to a limit agreed with the landlord. The agent will refer expenditure above that limit to the landlord.

Training

We would welcome any proposal that agents who are license holders should undergo training.

Membership of **safeagent** means that agents already have access to an extensive training package, engagement with which should reduce the need for the local authority to intervene. Although not a *condition* of **safeagent** membership, **safeagent** offers short courses and qualifications in Lettings & Management at Levels 2 and 3 which are Ofqual recognised

safeagent offers training to those who have been involved in lettings and management for some time as well as those who are just starting out. Training is available for principals of firms as well as employees. Thus, **safeagent's** Virtual Learning Environment (VLE) is designed to cater for a wide range of professional development needs. Training is easily accessible and can be undertaken when it suits the trainee. Any candidate completing the **safeagent** Foundation Lettings Course successfully also has the opportunity to use the designation **'safeagent qualified'**. **safeagent** Foundation Lettings Course (Wales) is recognised by Rent Smart Wales, the Welsh Government's regulatory body, as meeting their requirements for agents to undergo training.

One advantage of this approach is that it makes it easy to ascertain (through on-line monitoring) that participants have in fact undertaken the required training, prior to or immediately after accreditation.

Modules available cover:

- Pre-tenancy issues
- Responsibilities and liabilities
- Setting up a tenancy
- During a tenancy
- Ending a tenancy
- General law concepts, statute vs contract
- Relationships
- Obligations
- Process
- Considerations for corporate tenants
- Continuing Professional Development (CPD)

In addition, **safeagent** provides mini online courses designed to cover a number of elements in more detail, as appropriate to the learner's role, include topics such as:

Assured Shorthold Tenancies (ASTs)
Client Money
Consumer Protection Regulations (CPRs)
Deposits
Disrepair
Electrical Appliances & Safety
Gas Appliances & Safety
Houses in Multiple Occupation (HMOs)
Housing, Health & Safety Rating System (HHSRS)
Inventories and schedules of condition
Joint Tenancies
Notice Requiring Possession

We would further suggest that discounted fees for **safeagent** agents would provide an incentive to positive engagement with training that is fully compatible with the requirements of the licensing scheme.

Anti-Social Behaviour

For our members, dealing with actual and perceived anti-social behaviour in the PRS is a day to day activity. However, in general, we have concerns about the assumed link between the amount of PRS accommodation in the neighbourhood and the incidence of ASB.

There may be some *correlation* between incidences of ASB and the prevalence of PRS accommodation on the area. However, correlation does not imply *causation*. The *causes* of ASB are many and varied. It is not, in our view, reasonable to expect agents and landlords to play a disproportionately large part in tackling them.

Furthermore, we would strongly advise against any proposals which imply a parity of approach between the PRS and the social rented sector. Social landlords are publicly funded (and regulated) to develop and manage housing on a large scale. Their social purpose brings with it wider responsibilities for the communities in which they work. As private businesses, PRS landlords and their agents, whilst having clear responsibilities to manage their properties professionally cannot reasonably be expected to tackle wider social problems.

Suitability of Licence Holder

We support the requirement that the proposed licence holder should be a 'fit and proper' person and that there are suitable management arrangements in place. We believe that this requirement highlights the importance of lettings and management agents belonging to recognised accrediting bodies like **safeagent,** who themselves apply a fit and proper person test.

All principals, partners and directors of a **safeagent** firm are asked to make the following declaration on application:

– *"I confirm that: for a period of 10 years prior to this application I have had no conviction for any criminal offence (excluding any motor offence not resulting in a custodial sentence) nor have I been guilty of conduct which would bring the Scheme or myself into disrepute; I am not an undischarged bankrupt nor is there any current arrangement or composition with my creditors; I am not nor have I been a director of a company which has within the period of 10 years prior to this application entered into liquidation whether compulsory or voluntary (save for the purpose of amalgamation or reconstruction of a solvent company) nor had a receiver appointed of its undertaking nor had an administration order made against it nor entered into an arrangement or composition with its creditors; nor have I at any time been disqualified from acting as a Director of a company nor subject to a warning or banning order from the Consumer Markets Authority or the Department for Business, Enterprise and Regulatory Reform.*

If I am subject to any current claim or am aware of any impending claim for professional negligence or loss of money or if I have been the subject of any investigation by the Consumer Markets Authority and/or local Trading Standards Office, full details of the circumstances are set out in a report enclosed with the application; all information provided by me in connection with this application is, to the best of my knowledge, correct"

We believe this certification is broadly in line with Havering council's licensing conditions and is another example of where promotion of **safeagent** membership through discounts could help to ensure compliance. Acceptance that agents have already made a fit and proper person declaration could save 120 minutes of staff time per license application, according to the cost formulation and calculation.

Complaints

All **safeagent** firms are required to have a written customer complaints procedure, available on request. Our guidance sets out how the first step for complainants is to ask the firm they are dealing with for a copy, which will outline the method by which they can seek to resolve any issues.

In line with statutory requirements, all **safeagent** members must also be members of a recognised redress scheme. Firms are required, at the request of the complainant, to refer the complaint to a redress scheme once their in-house procedure has been exhausted. They are also required to comply with any award determined by the redress scheme, within the timescale prescribed.

Under co-regulation schemes elsewhere in the UK, **safeagent** has undertaken to review any complaints that have been adjudicated upon by any of the redress schemes. Under such an arrangement, **safeagent** can report to the council on the number of complaints reaching this stage and on the adjudications made. Non-compliance with a redress scheme's adjudication would eventually lead to disqualification of the agent from **safeagent**. We would be happy to come to a similar arrangement with Havering Council.

MEASURING THE SUCCESS OF THE SCHEME

We believe that regular information on implementation of the scheme should be made available in a clear and consistent format. Reports to local landlord and agent forums, representative bodies and other stakeholders should include at minimum:

- The estimated number of private rented properties that require licensing under the schemes
- The number of applications received in respect of these properties
- Progress in processing (granting, querying or refusing) the licence applications received
- Analysis of the reasons for any queries or refusals and the extent to which remedial action is identified and taken as a result
- Analysis of the outcomes of ongoing inspections and the extent to which remedial action is identified and taken as a result
- Progress reports across the whole 5 year period covered by the scheme.

This should help to enable the council to work in partnership with landlords, agents, representative bodies and other stakeholders to ensure the success of the scheme.

CONCLUSION

It seems to us that many of the licencing requirements in the Havering Council schemes highlight how important it is for landlords to work with reputable agents such as **safeagent** members. Offering fee discounts to licence holders who work with a **safeagent** accredited agent will help to promote this.

safeagent would welcome a collaborative approach with Havering Council, based on shared objectives. We believe that agents who are members of a recognised body are more likely to embrace licensing and less likely to generate complaints to the council or breaches of their licence. Discounted fees for **safeagent** members would be a significant incentive to positive engagement by agents. In return, the Council would experience reduced administration and compliance costs.

CONTACT DETAILS

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championing a responsible rental sector

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Manchester, M1 6EU

0300 131 6400
info@nrla.org.uk
www.nrla.org.uk

London Borough of Havering

5th July 2025

Dear Sir or Madam,

Selective and Additional Licensing Proposals

The NRLA is an association following the merger of the National Landlords Association and the Residential Landlords Association. Our membership represents over 110,000 landlords and agents, the largest organisation in the sector.

We appreciate the chance to provide our input on the consultation concerning the continuation of selective licensing and additional licensing in Havering. The NRLA opposes the implementation of discretionary licensing by local authorities. While we understand the intentions of Havering, we believe that further licensing is not conducive to achieving these goals effectively.

The NRLA strives for a just legislative and regulatory framework for the private rented sector, ensuring that landlords are aware of their legal rights and obligations.

Main Objections

Antisocial behaviour and low housing

Landlords lack the expertise to handle antisocial behaviour and are not equipped to address tenants' mental health issues or substance abuse problems. If a tenant is causing issues and the landlord decides to terminate the tenancy, they believe they have fulfilled their responsibilities, even if the tenant is struggling with these issues. This simply shifts the problem elsewhere in the Havering area, potentially leaving the tenant neglected or vulnerable to unscrupulous landlords, impacting other residents negatively.

Additionally, overcrowding poses a challenge for landlords when tenants exceed the property's capacity. Landlords are responsible for informing tenants about occupancy limits and prohibiting subletting or additional occupants. What information and support can the council provide to support landlords in such situations?

It is unrealistic for landlords to monitor tenants' daily activities or sleeping arrangements. When it comes to addressing antisocial behaviour, landlords can only enforce the terms of the contract; they cannot control tenants' behaviour.

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www.nrla.org.uk

Waste management

It is worth exploring, if such a mechanism is not already in place, a cost-effective or complimentary service to assist private landlords in removing bulky items left behind by tenants upon vacating the property. This could potentially streamline the process and prevent waste from being discarded prematurely. Councils such as Leeds City council offer such a service to its licenced landlords and has reduced fly tipping as a result.

Existing Enforcement Powers and Activity

The council possesses a variety of housing enforcement legislation that can be used to address substandard conditions in the PRS, including the Housing, Health, and Safety Rating System (HHSRS). These enforcement powers are currently at the disposal of the local authority and do not necessitate consultation prior to implementation.

Inspection regime and licence processing

Does the council intend to inspect every property at least once throughout the lifetime of the scheme after a licence has been in place for a period, and what kind of inspection regime will the council adopt i.e. street by street or by risk assessment? Does the council have a set timescale in place for the processing of licences.

Conclusions and alternatives

The NRLA holds the belief that a thriving private rented sector is necessary for local authorities to complement the existing housing options in an area. This sector offers a diverse range of housing types that can cater to the needs of both residents and landlords in the city. It is crucial to regulate this sector and enforce necessary measures to prevent criminals from exploiting landlords and tenants. Implementing an active enforcement policy that supports reputable landlords is of utmost importance as it will eliminate those who take advantage of others and establish a fair and level playing field.

The NRLA proposes the utilisation of council tax records to identify the tenures utilised by the private rented sector and the landlords responsible for these properties. Unlike discretionary licensing, this approach does not require landlords to self-identify, making it more challenging for criminal landlords to operate unnoticed. By adopting this method, the council would not need to immediately consult and implement changes.

If the proposed scheme is approved and put into action, the council should provide an annual summary of outcomes to showcase the improvements in tenants' and landlords'

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championing a responsible rental sector

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behaviour and the impact of licensing on the designated area throughout the scheme's duration. This would enhance overall transparency.

While the NRLA shares a common interest with Havering in ensuring a high-quality private rented sector, it strongly disagrees that further selective and additional licensing is the most effective approach to achieve this goal in both the short and long term.

Yours Faithfully,

[redacted]
Senior Policy Officer
National Residential Landlords Association
[redacted]

Company No. 12187275

propertymark

Havering Council – Additional and selective Licensing Consultation 2025
Consultation on a proposal to reintroduce a borough-wide Additional Licensing scheme for the London Borough of Havering and to expand the selective licensing scheme to Seven wards
Response from Propertymark
May 2025

Background

1. Propertymark is the UK's leading professional body of property agents, with over 19,000 members representing over 12,800 branches. We are member-led with a Board which is made up of practicing agents and we work closely with our members to set professional standards through regulation, accredited and recognised qualifications, an industry-leading training programme and mandatory Continuing Professional Development.[1]

Overview

2. Havering Council are proposing an additional Licensing scheme for small Houses in multiple occupation (HMOs) covering all wards which is due expire in January 2026. A seven-ward expansion of the Selective Licensing scheme is also proposed to include: Beam Park. Harold Wood, Rainham & Wennington, Rush Green & Crowlands, Squirrels Heath, St Albans and St Edwards as the Council believes that they meet the criteria and would benefit from the adoption of scheme.

Summary

3. Thank you for the opportunity to respond to the consultation on reintroducing a borough-wide additional licensing scheme and the expansion of Havering's selective licensing scheme in the London Borough. Propertymark is supportive of efforts made by local authorities to improve housing stock within the private rented sector (PRS). However, we do not think that licensing is the best method to achieve this aim. Accordingly, we object to your proposal. Propertymark would prefer a regulatory framework, which seeks to educate landlords in improving their stock rather than punitive measures that are difficult to enforce and only punish compliant landlords letting those that require improvements to go undetected. We oppose this proposal on several grounds which are set out below.

Licensing structure

[1] [1] https://www.propertymark.co.uk/

4. **Scope of the scheme** – It is disappointing that Havering Council must renew their previous additional licensing scheme for a further five years. This clearly demonstrates that the aims and objections from the previous scheme were not met, and they should find a new way of improving standards. Furthermore, we think that both proposed schemes on a local authority level would be duplicitous with the provisions of a national landlord's registration scheme being proposed in the Renter's Rights Bill as outlined in the Kings Speech[2] and is currently at the Report Stage in the House of Lords.[3] We would be grateful if Havering Council would clarify if this would be the final phase of the additional licensing scheme as we have intelligence of some local authorities considering a third phase. Additionally, some of the justifications for the scheme would not be from a direct consequence of issues within the PRS, but other housing tenures. We note that in some communities within the London Borough of Havering, the percentage of social housing is greater than the percentage of PRS housing. Therefore, it is likely that any social problems within this area are contributed by social housing. Essentially, using a borough-wide scheme is difficult to find the root cause of issues and the Havering should consider targeting their scheme.

5. **Costs of the scheme** – We hope that Havering Council can clarify how much these schemes will cost. Many additional and selective licensing schemes are a significant investment for local authorities, and we would ask that Councillors consider carefully if such a scheme offers value for money for their residents and is the most cost-effective method to improve the quality of the PRS. We note that the additional licensing scheme is being reintroduced. Accordingly, what has been the overall cumulative cost for the Council in implementing licensing. The costs should include the total costs for the Council in administering property licensing.

6. **Fees** – The fees criteria[4] are complicated and is subject to different levels of fees depending on several criteria including bed spaces. We think this could be misinterpreted by some landlords. With fees of up to £950 for an additional licence and £1,400 for a selective license, the fee is high given the economic challenges and costs faced by landlords operating in the area. It is also high when compared to other local authority licensing schemes including £650 in Newcastle[5] and £550 in Liverpool.[6] The fee is also higher compared to fees for many additional licenses schemes in London Boroughs where costs are typically high. We welcome the inclusion of discounts for

[2] The King's Speech 2024 - GOV.UK (www.gov.uk)
[3] https://bills.parliament.uk/bills/3764
[4] General document
[5] Fees and Charges.pdf (newcastle.gov.uk)
[6] Fees, discounts and exemptions - Liverpool City Council

landlords who are members of an accredited landlord's scheme, properties that have achieved EPC C and multiple properties. We are also pleased to see that the council will offer a discount to landlords and agents who are members of accredited membership organisations but would be grateful for clarity if that would extend to Propertymark members. Propertymark members can demonstrates that they are suitably qualified, have access to regular training and meets compliance and regulatory standards, so encourage the Council to consider discounts for Propertymark member letting agents. We also note that there is no discount for additional licensed properties which specifically disadvantages landlords with large portfolios. We would welcome clarity on how agents can pay fees and would recommend that in some instances agents may wish to pay by invoice especially if they are administering many property licenses.

7. **Impact of cost-of-living and landlords** - Regardless of the fee level, we are concerned these charges will come at a time when landlords are impacted by ongoing mortgage costs, the cost-of-living crisis and the impact fees could have on the ability of landlords to improve standards. Our members have also told us that a common concern from landlords on licensing schemes is that the costs can be extremely high for landlords especially those, as we have just highlighted, as having larger portfolios of properties. These costs are especially high for landlords operating in London Borough's such as Havering.

8. **Impact on supply of homes** - Exiting the market is especially a concern for smaller landlords who are more likely to sell their properties and further shrink the supply of much sort after PRS properties leaving remaining private tenants with higher rents. Our research on the shrinkage of the PRS[7] found 53% of buy to let properties sold in March 2022 left the PRS and that there were 49% less PRS properties to let in March 2022 compared with 2019. In addition to these concerns, those landlords who remain in the market, often have less money to improve conditions from increased costs. If the decision to operate a borough-wide additional licensing scheme and expand the selective licensing scheme across Havering is approved in areas that are already low demand, then there is a concern that landlords currently operating within these areas could invest in neighbouring local authority areas or exit the market altogether. This could result in fewer housing options for people living in Havering communities meaning some people might be forced to find housing options outside the area, change employment or break social ties within the community.

[7] A shrinking private rented sector | Propertymark

9. **Unintended Consequences** – We are pleased to see that Havering Council acknowledge that the PRS is an important and increasingly growing tenure that is home to many people living within the Borough and estimated to make up 19.3% of the borough's housing market and continues to grow[8]. Renting in Havering can be expensive with a median rent in some Havering post codes being £1,400 per calendar month (September 2024[9].) It is likely that many low waged and people in receipt of benefits access the PRS in Havering live in HMO property. We are concerned that landlords may increase rent due to the added and significant costs of licenses. Consequently, some renters living within the Borough will require cheaper accommodation due to being on a low income and the continued challenges in the cost-of-living crisis. We previously outlined the possibility that further legislation could reduce the housing options of the most vulnerable from landlords exiting the market there could be further implications on the rent level for those landlords who remain. As is the general law of supply and demand, if the supply of PRS property reduces, the cost of rent for the remaining properties is likely to rise. With the current demographics of persons accessing the PRS in Havering, there is a very real danger that many low-income families will be priced out of living in the area.

Improving standards

10. **Property condition** – Large parts of Havering are characterised as including significant levels of older housing stock. Areas that have these characteristics are often inner-city communities with large section of pre-1919 built housing. Accordingly, a significant amount of investment is required to improve the condition of stock including the energy efficiency of properties. We would be grateful if Havering Council could clarify if they have any proposed financial grants or loans available for landlords to improve stock.

11. **Energy efficiency** - Since 1 April 2020, landlords in England and Wales can no longer let or continue to let properties covered by the Minimum Energy Efficiency Standards if they have an Energy Performance Certificate (EPC) rating below E, unless they have a valid exemption in place. The current UK Government are making provisions for revised energy efficiency standards for landlords to meet EPC C by 2030. According to the consultation document "Havering has a slightly lower proportion of households in fuel poverty (9.3%) than the London average (12%). 3 These figures are likely to significantly change at the next point of publishing as a result of the 2022 acute

[8] Havering Council Selective and Additional Licensing Consultation - London Borough of Havering Council - Citizen Space
[9] London rents map | London City Hall

fuel price increases[10]However, only a very small number of properties would be below EPC E, and these may be exempt.

12. **Current enforcement** – Havering Council is experienced in the implementation of Licensing Schemes with the previous schemes. We would be grateful for some clarity on the performance of previous schemes. For example, how many working days did it take for a typical licence application to be processed and issued? The Council also highlight some of the key statistics on their enforcement activity including warning letters, prosecutions, and civil penalties issues. We would be grateful if this data could be broken down by years. We would also be grateful for clarity on the reasons for issuing civil penalties for example, how many were for over-crowding, banning orders or for simply not obtaining the correct license.

13. We would like clarity on the number of hazard warning letters were sent, notices and civil penalty notices issued broken down by year from the previous schemes. We would also welcome clarity on what the Council's future enforcement policy will entail. How will the Council educate landlords to ensure they are complaint, and for those landlords who struggling with the management of properties, will the Council recommend landlords discharge their duties to Propertymark registered agents?

Engagement

14. **Engagement with landlords and letting agents** - For most cases of substandard accommodation, it is often down to landlord's lack of understanding rather than any intent to provide poor standards. We note that Havering Council did not respond to our recent Freedom of Information request on landlord engagement since 2021. Therefore, we would like clarity on how Havering Council engages with landlords and property agents including landlord forums, and training opportunities. In addition, we would welcome clarity on how the council encourages landlords and agents to be members of an accredited membership scheme such as Propertymark.

15. To strengthen this engagement, we would be very happy to support the council in engaging with our members and local property agents. A licensing scheme is a very reactive mechanism, and it is far more beneficial to have a programme of education to engage with landlords on helping them improve before a situation gets worse. We would welcome clarity on what training opportunities

[10] LB Havering PRSL Consultation Evidence Pack v1.pdf

the council will provide to landlords and agents to help them understand their responsibilities and improve standards. We recognise the council have made strong efforts in this in the past with engagement via the Council's Landlord Forum and an accreditation scheme for local landlords. However, engagement is more credible over a longer more embedded period. Propertymark has a network of Regional Executives and a series of Regional Conferences that take place throughout the year.[11] We would be very happy to work with the council to engage with local agents over a victual roundtable discussion on how standards can be improved.

Tackling Anti-Social Behaviour (ASB)

16. Some areas of Havering are integral to the night-time economy within the Borough. Accordingly, it is likely that Anti-Social Behaviour (ASB) is contributed from a variety of sources outside private tenants. We would like clarity on how Havering Council works with their Community Safety Teams and stakeholder partners to offer a multi-agency approach. Unfortunately, landlords are not the best equipped to deal with anti-social behaviour and certainly do not have the skills or capacity to deal with some tenants' problems such as mental health or drug and alcohol misuse. As one example, if a landlord or their agent had a tenant that was causing anti-social behaviour, the only tool that the landlord or agent could use would be to seek possession from the tenant under a Section 8 notice. While this would remedy the problem in the short-term, the tenant is likely to still occupy this behaviour and all that has been achieved is that the anti-social behaviour has moved from one part of Havering to another or another local authority area. In this context, it should be noted that with regards to reducing anti-social behaviour, landlords and their agents can only tackle behaviour within their properties. Effectively, they are managing a contract and not behaviour. Landlords and their agents are not responsible in any form for anti-social behaviour occurring outside the property. Nevertheless, we would be interested to learn about any partnership work the council are proposing with stakeholders such as the Metropolitan Police, London Fire Brigade, Justice for Tenants, Safer Renting, and the Citizens Advice Bureau in reducing anti-social behaviour within communities including outcomes from the Home Office funded Safer Streets Programme which we have seen effectively delivered in other London Boroughs.

Environmental crime

17. The evidence document has highlighted additional licensing as a tool to tackle environmental crimes such as fly tipping, poor waste, husbandry and street cleaning. The evidence document

[11] https://www.propertymark.co.uk/about-us/board-and-governance.html

states "There is a connection between HMOs and poor waste management. All property licences contain a condition that the holder must provide adequately sized bins and sufficient recycling containers for the occupiers." However, Havering Council have provided no evidence to support the extent that particular PRS properties are impacted by both fly tipping and other environmental crimes, and as is the case in most local authorities, we suspect this is an issue on local authority highways. While we welcome efforts to tackle fly tipping, unless the perpetrator is caught doing the fly tipping or there is some sort of evidence, such as an addressed letter, within the fly tip, then it is impossible to suggest to what extent fly tipping is a problem in the PRS. Even if the link between fly tipping and the PRS could be proved, there is very little that landlords could do for any behaviour outside the tenancy unless the fly tip was done within the grounds of the property.

Selective Licensing and Section 21

18. Propertymark would like clarification on Havering Council's policy concerning helping a landlord when a section 21 notice is served, the property is overcrowded, or the tenant is causing antisocial behaviour, as per the council's consultation. What steps will the council take to support the landlord? It would be useful if the council were to put a guidance document before introducing the scheme to outline its position regarding helping landlords remove tenants who are manifesting antisocial behaviour. The recent proposed changes to section 21 legislation and how tenancies if implemented could mean landlords will become more risk-averse to taking tenants with a perfect reference and history. We would be willing to work with the council and develop a dispute resolution service with other local authorities.

Conclusions and alternatives

19. Propertymark thinks that local authorities need a healthy private rented sector to complement the other housing in an area. This provides a variety of housing types that can meet the needs of both residents and landlords in the area. Appropriate regulation and enforcement are essential for improving standards and removing criminals from the sector who exploit landlords and tenants. An active enforcement policy that supports good landlords and letting agents is crucial as it will remove those who exploit others and help create a level playing field. It is essential to understand how the sector operates as landlords and letting agents can often be victims of criminal activity and antisocial behaviour with their properties being exploited.

20. If the scheme is approved, the Council should consider providing an annual summary of outcomes to demonstrate to tenants, landlords and letting agents' behaviour improvements and the impact

of licensing on the designated area over the scheme's lifetime. This would improve transparency overall. Propertymark has a shared interest with Havering Council in ensuring a high-quality private rented sector but strongly disagrees that the introduction of the proposed measures is the most effective approach to achieve this aim both in the short term and long term.

21. We would welcome the opportunity to work with Havering Council to further engage with our members and property agents in the local area.

8

Appendix 5 – Letter of support

London Borough of Harrow

From: [redacted]
Sent: 30 June 2025 18:54
To: prsconsultation <prsconsultation@havering.gov.uk>
Cc: [redacted]
Subject: Support for the Renewal of the Additional HMO Licensing Scheme

[redacted]

Dear Sir/Madam,

I am writing on behalf of The London Borough of Harrow Council to express our strong support for The London Borough of Havering's proposal to implement new property licensing schemes when the current additional (HMO) and selective licensing scheme expire. As a Greater London authority with a shared commitment to improving housing standards and supporting residents, we recognise the significant benefits that such schemes bring to communities, tenants, and local governance.

Harrow has seen the positive impact of robust HMO licensing from our own scheme. Since implementing our own Additional HMO and Selective Licensing Schemes, we have seen measurable improvements in property conditions, tenant safety, and community cohesion. The scheme has enabled us to identify and address issues such as overcrowding, inadequate fire safety measures, and poor property management, which are often prevalent in areas with high concentrations of HMOs. By requiring landlords to meet stringent standards, the scheme has not only enhanced living conditions for those who are most in need but also reduced anti-social behaviour and the strain on local services.

We understand that Havering has identified specific challenges in your area, including poor property conditions and inadequate property management. Implementing new property Licensing Schemes will provide your authority with the necessary tools to regulate these properties effectively, ensuring that landlords maintain safe, habitable, and well-managed accommodations.

Furthermore, the renewal of your scheme will complement regional efforts to uphold consistent housing standards across our authorities. Collaborative approaches to HMO regulation help prevent the displacement of poorly managed properties to neighbouring areas, ensuring a cohesive strategy for tackling housing challenges. We are confident that continuing this scheme will strengthen your ability to enforce compliance, support tenants, and enhance the overall quality of life in your communities.

Should you require any further information about our experiences with the Additional HMO Licensing Scheme, please do not hesitate to contact me at the offices below.

We wholeheartedly endorse your efforts to renew the scheme and wish you success in its implementation.

Regards

[redacted]

[redacted] www.harrow.gov.uk

London Borough of Harrow, Forward Drive, Harrow, HA3 8FL

LONDON BOROUGH OF HARROW

Creating a Fairer Private Rented Sector

Additional HMO and Selective licensing Consultation

Havering Council's response to comments and representations received during the public consultation

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1. Introduction

In order to improve the standard of privately rented property in the borough, Havering Council is proposing to introduce an additional HMO licensing scheme which will apply to houses in multiple occupation (HMOs) across the whole borough as well as a selective licensing scheme which will apply to all privately rented properties in seven out of 20 wards of the borough. During the consultation, the Council received a range of responses regarding the proposed new schemes and the wider private rented sector in Havering. The Housing Act 2004 requires the Council to consider any representations made in accordance with the consultation which are not withdrawn. The following is the Council's formal response to these representations, which have been considered and have informed a number of changes to the proposed schemes.

2. Positive responses to the proposed schemes

The council would like to acknowledge some of the comments received during the consultation in support of the proposed scheme. These have helped to validate the council's approach and highlight the strengths of the proposal, which will be built upon to make the scheme even more effective.

- Excellent scheme if borough manages it well
- This is all great but must be enforced. I walk down my road and can tell the properties that are privately rented. Scruffy and poorly maintained. This plan has synergies with the where we live initiative - if people have pride in where they live standards will increase. The house adjoining me is privately rented and is a mess that has caused issues over some years with shady landlords and low grade tenants who do not care about the neighbourhood. Have a look at XXX for an example of what I think you are looking to improve. I wholeheartedly support this initiative and look forward to seeing the plan put into action.
- I think this is an excellent idea. I am a landlord in Barking & Dagenham and have a selective licence. This is the only way to approve conditions for tenants and stop poor properties being rented out.
- Hopefully the licensing schemes will improve the conditions in the private sector. There are some landlords who do not reinvest any rental monies back into the property to prevent health and safety issues.

3. Main themes from consultation feedback

The consultation focused on the extent to which respondents agree or disagree with the council's proposal to introduce the selective and additional HMO licensing schemes. The consultation also looked at views on the proposed licence conditions and fees.

The consultation questionnaire featured free text boxes which provided respondents with opportunities to comment on the proposals in their own words, specifically:

- If you disagree with the proposals for an additional HMO licensing scheme, please can you explain why and what alternatives you think should be considered to address the problems?
- If you disagree with any of the discretionary conditions for additional HMO licensing please can you explain why?
- Are there any other additional licence conditions (that are not already covered by a mandatory or proposed discretionary licence conditions) that you think should be included? If 'Yes', please state below
- If you disagree with any of the above [selective licensing scheme outcomes], please can you explain why and what alternatives you think should be considered to address the problems?
- If you disagree with any of the discretionary conditions for selective licensing, please can you explain why?
- Are there any other selective licence conditions (that are not already covered by a mandatory or proposed discretionary licence conditions) that you think should be included? If 'Yes', please state below
- If you disagree with any of the objectives for the licensing scheme, please can you explain why?
- Are there any other licence scheme objectives (that are not already covered by the objectives listed) that you think should be included? If 'Yes', please state below
- Is there anything else you think the council should consider to help improve the condition and management of the private rented sector in Havering? Are there any other comments that you would like to make about the proposed additional HMO and/or selective licensing schemes?

The comments and feedback from the online survey, written representations received and those made during online public forum events have been analysed and categorised into themes. The council's response to these comments and themes are shown below:

3.1 General comments about licence conditions

The following outlines **general** comments received about the licence conditions.

Theme	Issue	Example Comment	Comment Source	Council Response
Selective Licence Condition 3 **Additional HMO Licence Condition 4**	There is concern about how 'acceptable references' will be defined under Selective condition 3 and Additional HMO condition 4, especially as many vulnerable populations are unlikely to have UK-based references.	*Point 4.1 - how are you going to deem what an acceptable reference is, for asylum seekers who are housed will likely have no references from anyone in the UK as the majority are paying traffickers to get to the UK. And to add to this - many of these people, with no references will probably be housed under your Point 2.4 d so they won't need any references.*	Consultation survey comments	The Council agrees that the absence of references should not automatically disqualify individuals from being considered for a tenancy, particularly in cases involving vulnerable groups. Enforcement action is considered on a case-by-case basis and factors impacting on the ability to obtain references will be taken into consideration. However, the Council agrees to reword the condition as follows: No new occupiers shall be allowed to occupy the house if they are unable to provide suitable references. (References should be as a minimum, checks to ensure the tenants identity, whether they have the right to rent a property [see **https://www.gov.uk/check-tenant-right-to-rent-documents/who-to-check**], their ability to pay rent and their past history as a tenant.) The licence holder must provide evidence of such reference and checks carried out

Theme	Issue	Example Comment	Comment Source	Council Response
				when requested by the Council within 14 days on demand.
Misinterpretation of 'discretionary' conditions	Many respondents noted that they understood the discretionary licence conditions to be optional for either the landlord to comply to or the council to impose upon a given licence.	*Discretionary conditions may also open the door to subjective enforcement, with different interpretations applied by different officers, leading to uncertainty for landlords and inconsistent outcomes. Rather than helping improve housing standards, this creates confusion and cost without clear benefits to tenants.*	Consultation survey comments	We appreciate the feedback received regarding the interpretation and application of discretionary licence conditions. To clarify, the selective and additional HMO licensing schemes include two types of conditions: • Mandatory conditions, which are required by national legislation and apply uniformly across all licences. • Discretionary conditions, which local authorities have the power to design and implement in response to specific local housing needs and priorities. While the term "discretionary" may suggest flexibility, once these conditions are adopted as part of the licensing scheme, they are not optional for landlords. They are enforceable and will be applied consistently across all licences issued under the scheme. The Council may, however,
		Discretionary won't hold any weight and when would the council use it. Will it fall away and be applied too late and not effective.		
		The mandatory conditions are those relating to electrical, gas and fire safety, tenancy agreements and references should prevail. Same standard for all.		

Theme	Issue	Example Comment	Comment Source	Council Response
				apply additional conditions in specific cases where circumstances warrant further oversight. These discretionary conditions are intended to complement mandatory standards and enable the Council to address issues such as anti-social behaviour, waste management, and property upkeep more effectively.
Excessive burden	Landlords argue that there are too many licence conditions, they are excessive and place an unfair burden on responsible landlords. They believe that the current regulations and requirements are already sufficient and that additional conditions will only increase costs and administrative work for landlords. Additionally, in many cases, respondents argued that the conditions duplicated those already required by or proposed in other legislation.	*I also disagree with the proposed discretionary conditions because they often duplicate existing legal requirements, creating unnecessary complexity and scope for inconsistency. Many of these conditions are vague, overly prescriptive, or not evidence-based, which risks turning routine property management into a bureaucratic burden.* *Discretionary conditions may also open the door to subjective enforcement, with different interpretations applied by different officers, leading to uncertainty for landlords and inconsistent outcomes. Rather than helping improve housing standards, this creates confusion and cost without clear benefits to tenants.*	Consultation survey comments	The Council considers the proposed licence conditions to be comprehensive but not excessive. Many of the conditions are mandatory by law and must be included on all licences, which is beyond the Council's control. The licence conditions are not intended to place an unfair burden on landlords; they are intended to ensure that private rented properties meet essential safety standards. By adhering to these conditions, landlords can provide safe, habitable, homes for tenants, ultimately benefiting both landlords and the community. The Council acknowledges that landlords are subject to existing regulations and laws. However, the existing regulations and powers do not require landlords to declare

Theme	Issue	Example Comment	Comment Source	Council Response
		I strongly disagree with the proposed discretionary conditions. They create unnecessary complexity and financial burden for compliant landlords. The council should focus on enforcing existing laws rather than introducing more regulations that affect good landlords and increase rental costs for tenants. I do not support the additional conditions. They are unfair and unnecessary.		themselves to the council. This means there is no obligation for landlords to make their properties known to the council or to be proactive in improving conditions, including minor issues (that may still pose a health and safety risk) but still need to be addressed, but which a tenant may not complain to the council about. Formal action under the Housing Act can be a slow process, and improvements to properties can take many months. Whilst the Council acknowledges that many landlords operating in the borough keep their properties to a high standard, the evidence presented during the consultation shows that there are large scale issues with poor property conditions in the borough's private rented sector, that licensing can help to address. The council believes that many landlords will meet the licence conditions, and do keep their properties in good condition, but licensing enables the council to take action against those landlords who place their tenants in unsafe properties.
Parking conditions	Respondents expressed the need for restrictions on street parking, particularly around HMOs	*HMO should address parking restrictions, a house containing up to 4 people can have strain on parking down a street*	Consultation survey comments	While the Council understands the frustration caused by parking issues, it is not feasible to impose conditions to limit the number of vehicles per property or

Theme	Issue	Example Comment	Comment Source	Council Response
		Must be some sort of considerations made around parking. If there is a house with multiple adult tenants then there are potentially multiple cars also. On streets with permit parking, and limited parking multiple HMOs impact parking - especially where there are not allocated spaces.		require off-street parking, as such restrictions exceed the legal scope of the Housing Act 2004 and the licensing regime. Parking considerations are however taken into account when an owner applies for planning permission to convert a property into an HMO. However, monitoring and enforcing vehicle limits or off-street parking requirements would be highly challenging. It would necessitate significant resources and continuous oversight, which are not currently available.
		Parking restrictions, though. It always practical, would be very useful. Potentially reviewing the need to add parking control zones where HMOs exist. *At the very least there needs to be conditions that HMO tenants cannot repair or sell vehicles from the property.*		
More conditions required	There were also comments that there should be more conditions, and these should be stricter.	*Rent should be affordable for anyone on the minimum wage and a basic pension. The council pay private landlords too much cash over the odds … it's time the council took control of all the housing stock.*	Consultation survey comments	The Housing Act 2004 specifies mandatory conditions that must be applied to all licences. The council can only impose other discretionary conditions in order to deal with the management, use and occupation of the licensed property and additionally for HMOs its condition and contents. Whilst the Council appreciates the request to include other licence conditions these

Theme	Issue	Example Comment	Comment Source	Council Response
		The person's living in HMOs should also be responsible decent, people with no criminal background, no junkies, drunks, or antisocial tenants in our neighbourhood.		fall outside the scope of the Housing Act 2004 and cannot be included.
		Make Land Registry update the landlord info every year. Any addresses they give is years out of date.		

3.2 Fees, discounts and the financial impact of the schemes

Theme	Issue	Example Comment	Comment Source	Council Response
Cost of licence fee	Respondents expressed concern that the proposed selective and/or additional HMO licence fee is too high and will create an unnecessary financial burden on landlords which could be passed on to tenants.	*With fees of up to £950 for an additional licence and £1,400 for a selective license, the fee is high given the economic challenges and costs faced by landlords operating in the area. It is also high when compared to other local authority licensing schemes including £650 in Newcastle and £550 in Liverpool.*	Propertymark letter, Safeagent letter, Consultation Survey Responses, Public Forum Q&A	The proposed fee has been calculated based on the cost of setting up and operating the licensing schemes. The aim is to ensure that the costs are covered by the expected income from the number of licence applications that the Council anticipates under the proposed designations. Councils are not permitted to make a profit from licensing schemes and careful consideration and financial modelling has gone into the licence fees and discounts. A selective licence obtained without any discounts will cost a one-off fee of £950 for a 5-year licence, which equates to less than £4 per week. An additional HMO licence obtained without any discounts will cost a one off-fee of £1,400 for a 5-year licence, which equates to less than £5.50 per week. The Council has also elected to offer a number of discounts to eligible landlords in order to reward and incentivise high property management standards.
		How is the £950 justified? Current national average licensing is £700 some London borough charge as low as £600, the scheme should be design not for profit		
		Also the cost of hmo considering the hugely bigger profit on it is not reflected in the fee, 850 discounted or 950 full price is massive for someone like me with one rented property, it doesn't make financial sense.		
		The proposed fees of £1400 (Additional) and £950 (Selective) seem high. These sums will place considerable financial burdens on landlords that, together with the cost of compliance with the licensing schemes, may result in a		

Theme	Issue	Example Comment	Comment Source	Council Response
		significant disincentive to continued investment in the PRS.		Whilst the Council recognises that the licence fee is a cost to the landlord, this is not considered unaffordable compared to the average rental income obtainable in Havering at present. According to ONS the average monthly rental price in Havering is currently £1522[1], meaning the selective licence fee would represent around a 1% reduction in rental revenue for the average property and additional HMO licence fee around a 1.5% reduction in rental revenue for the average property. The Council notes that the boroughs mentioned in the Propertymark submission are not neighbouring Havering. The total cost of an HMO licence in Liverpool is £1283 and not the £550 referenced. In regard to Newcastle, the fee of £650 quoted is for part 2 of a selective licence or part 2 of a renewal of a mandatory HMO licence; the whole fee for an additional HMO licence in Newcastle is £1000. Given the average monthly private rental cost in Newcastle was £1097 in April 2025, and the average for

[1] https://www.ons.gov.uk/visualisations/housingpriceslocal/E09000016/#rent_price

Theme	Issue	Example Comment	Comment Source	Council Response
				Havering was £1522 for the same period, as a proportion of average monthly rent, Havering's licence fee is lower than Newcastle's. The proposed selective licence fee is in line with many other London councils, including Southwark (£900) and Lambeth (£923). The Council is aware of a number of schemes which were recently consulted on where the proposed fees are in line or higher than Havering's, for example Westminster (£995 for a selective licence) and Barking & Dagenham (£950 for a selective licence). This suggests that the costs of operating a property licensing schemes are significantly rising. The proposed additional HMO licence fee is also in line with many other London councils and lower than some council's including Lambeth (£1,518), Westminster (£1,510) and Merton (£1,450 to £1,550). In boroughs where councils have also invoked a 'fee-per-bedroom' financial model, many landlords will end up paying considerably more than Havering's flat-fee for their additional HMO licence.

Theme	Issue	Example Comment	Comment Source	Council Response
				The Council is committed to ensuring the fees are fair and proportionate, and they will be reviewed throughout the schemes to ensure this remains the case.
Costs of implementing the scheme and value for money	Concern about whether the scheme is the most cost-effective method of improving the PRS.	*We hope that Havering Council can clarify how much these schemes will cost. Many additional and selective licensing schemes are a significant investment for local authorities, and we would ask that Councillors consider carefully if such a scheme offers value for money for their residents and is the most cost-effective method to improve the quality of the PRS. We note that the additional licensing scheme is being reintroduced. Accordingly, what has been the overall cumulative cost for the Council in implementing licensing. The costs should include the total costs for the Council in administering property licensing.*	Propertymark letter	The licence scheme is designed to be cost neutral and will not make a profit; the fee has been designed to be as low as possible whilst ensuring the cost of the licensing scheme is covered.
Money making schemes	Respondents expressed a belief that licensing is merely a means for the council to generate revenue, rather than a genuine effort to improve housing standards.	*Don't bring this is, you're just trying to make money and you don't bother inspecting the properties.* *These are all excuses to place additional costs on landlords which will be passed onto tenants*	Consultation survey comments	Under the law, the Council is not allowed to make money from the licensing schemes. The proposed fees have been calculated based on the cost of setting up and operating the licensing schemes, so that the costs would be met by the

Theme	Issue	Example Comment	Comment Source	Council Response
		Another revenue generator for a broken council. Poorly thought of scheme and ineffective real-world results that make private landlords want to exit the sector.		expected income from the number of licence applications the Council anticipate, under the proposed designations. The fee will be kept under annual review to ensure the schemes remain cost neutral.
Increased financial pressure on landlords	Landlords already under financial pressure due to interest relief removal and mortgage rises.	*Anther cost landlords cant afford. Already I make a loss on my property and am thinking of selling.*	Consultation survey comments, Public Forum Q&A, Propertymark letter	We are mindful of financial pressures that landlords may currently be under. Landlords are encouraged to claim reasonable business expenses related to rental properties which may help reduce your tax bill. The costs of licence fees can be claimed against annual tax bill. The Council is proposing a number of discounts and support measures for property improvements and balance the financial strain landlords will experience while maintaining fair and safe housing standards for tenants.
		Regardless of the fee level, we are concerned these charges will come at a time when landlords are impacted by ongoing mortgage costs, the cost-of living crisis and the impact fees could have on the ability of landlords to improve stand		
		This does not reward people who try to plan for their future and take risks, we are being hit with section 24, EPC standards, some people have day job which brings them to the higher tax bracket on which they pay higher tax on turnover due to section 24 not on profit, high interest rates, many landlords who are not in LTD companies do not even make a profit and now council		

Theme	Issue	Example Comment	Comment Source	Council Response
		going to hit us with a £950 fee, landlords are selling already and this will push some more landlords to sell making less properties available to rent and push rents even higher, time frame proposed do not allow landlords to adjust their plans we are locked with mortgages and with new renters bills we won't be able to vacate the property if we want to sell and get out private rented sector.		
Cost of raising standards of older properties	Concern about the cost to landlords of raising the standard of pre-1919 housing stock, particularly in relation to energy-efficiency, and a request for clarity over available grants and loans	*Large parts of Havering are characterised as including significant levels of older housing stock. Areas that have these characteristics are often inner-city communities with large section of pre-1919 built housing. Accordingly, a significant amount of investment is required to improve the condition of stock including the energy efficiency of properties. We would be grateful if Havering Council could clarify if they have any proposed financial grants or loans available for landlords to improve stock.*	Propertymark letter	The Council recognises the challenges associated with upgrading older properties, particularly in relation to meeting energy efficiency standards. While the Council does not currently offer grants specifically targeted at supporting landlords to improve older housing stock, we note that only 1.2% of private rented sector (PRS) properties in the borough fall below the current Minimum Energy Efficiency Standard (MEES) of EPC rating E. We encourage landlords to explore national funding opportunities and schemes that may be available to support energy efficiency improvements. Where possible, the Council will continue to signpost landlords to

Theme	Issue	Example Comment	Comment Source	Council Response
				relevant resources and provide guidance on compliance with MEES regulations. We remain committed to working collaboratively with landlords to improve housing quality across the borough, while being mindful of the financial pressures involved.
Additional costs will be passed on to tenants	Respondents expressed concerns about the costs associated with licensing and how it would increase rents for tenants.	*Adding £1000 to is going to add this to the rent. Completely unnecessary not needed money making scheme. If for the last six years my tenants had an issue they can go tote deposit scheme or citizens advice. They don't t need your license.* *All that will happen will be rents will increase more than they have.* *Any costs for the Landlord will be passed on to the tenants at the next rent review making renting even more unaffordable for lots of people*	Consultation survey comments, Public Forum Q&A	From administering its property licensing schemes, the Council has seen no evidence that landlords have increased rents to cover their licence fee costs or that landlords have moved elsewhere. This is supported by the findings from the many other Councils in London and nationally that run discretionary property licensing schemes (selective and/or additional) and have no evidence to support that licensing has pushed landlords out of the rental market.

Theme	Issue	Example Comment	Comment Source	Council Response
		Maybe they mean that good tenants will be penalised by having to increase rent to cover this licence		If a landlord decides to increase the rent for their property, there are procedures which must be followed and any increase above market rents levels can be challenged by the tenant via the Residential Property Tribunal.
Effect on rental supply	Concerns licensing could reduce the supply of rental properties as some landlords sell up due to extra costs/burden.	*If the decision to operate a borough-wide additional licensing scheme and expand the selective licensing scheme across Havering is approved in areas that are already low demand, then there is a concern that landlords currently operating within these areas could invest in neighbouring local authority areas or exit the market altogether.*	Consultation survey comments, Propertymark letter	From administering its current licensing schemes, the Council has seen no evidence that landlords have increased rents to cover their licence fee costs or that landlords have moved elsewhere. This is supported by the findings from the many other Councils in London and nationally that run discretionary property licensing schemes (selective and/or additional) and have no evidence to support that licensing has pushed landlords out of the rental market. If a landlord decides to increase the rent for their property, there are procedures which must be followed and any increase above market rents levels can
		The fees are excessive and disproportionate to the actual cost of running such a scheme. They risk pushing landlords out of the sector, reducing the supply of rental properties, and driving up rents — ultimately hurting the very tenants the scheme claims to protect.		

Theme	Issue	Example Comment	Comment Source	Council Response
		Landlords are already feeling the financial 'pinch' and this tax will be another burden on us and drive more landlords out of the market thus decreasing the availability of rental properties and increasing rents due to massive demand and low supply.		be challenged by the tenant via the Residential Property Tribunal.
Impact on low-income families	Concern that an unintended consequence of licensing could be that low-income families will be priced out of Havering	*Renting in Havering can be expensive with a median rent in some Havering post codes being £1,400 per calendar month (September 2024.) It is likely that many low waged and people in receipt of benefits access the PRS in Havering live in HMO property. We are concerned that landlords may increase rent due to the added and significant costs of licenses. Consequently, some renters living within the Borough will require cheaper accommodation due to being on a low income and the continued challenges in the cost-of-living crisis.*	Propertymark letter	As detailed previously, both the selective and additional HMO licence fees make up a relatively small proportion of the average monthly rental income in Havering (the selective licence equates to less than £4 per week over the 5-year scheme and the additional HMO licence equates to around £5.50) and therefore should not have an impact on rents charged in a competitive market. However, if landlords want to increase the rent, there are procedures which must be followed and any increase above market rents levels can be challenged via the Residential Property Tribunal.
Burden on and discounts/exemptions	Respondents suggested that small/occasional landlords may face a greater burden than large	*This should only be necessary if a landlord has multiple properties*	Consultation survey comments,	This has been considered but is not practical in application. Ultimately all landlords have the same responsibilities

Theme	Issue	Example Comment	Comment Source	Council Response
for small and occasional landlords	portfolio operators and should be granted additional assistance/discounts	*Do we have any understanding of how many PRS properties in Havering are owned by larger concerns who may be able to more easily deal with additional regulatory burdens – will any assistance be available for smaller landlords?* *I don't think you should be penalising single accidental landlords in this way.*	Public Forum Q&A	when letting a property be it for 6 months or 6 years, and irrespective of how many properties they own. It is crucial to maintain consistent standards across the whole sector. However, in common with all landlords, those landlords with fewer properties are able to take advantage of any number of the six discounts the council has proposed, and we would encourage all landlords to do so.

3.3 'Good' landlords and collaboration

Theme	Issue	Example Comment	Comment Source	Council Response
Negative impact on good landlords	Concerns that licensing schemes drive good landlords out of the market due to increased costs and bureaucracy, leaving fewer rental properties available. Equally, respondents expressed that rogue landlords would evade the scheme with good landlords bearing the costs.	*Penalises good landlords and makes it difficult for landlords to continue to rent properties. This in turns forces landlords to sell and reduce the housing stock*	Consultation survey comments, Public Forum Q&A	The council understands that many landlords who rent out properties in the private sector manage their properties responsibly. However, the evidence shows that the borough is experiencing large scale issues in the private rented sector with poor housing conditions and ASB. The Council's intention is to use the regulatory framework provided by additional and selective licensing schemes to focus on those that do not comply and impact negatively on the reputation of those responsible landlords as well as having a detrimental effect on tenants and neighbourhoods. Non-compliant landlords will be subject to more scrutiny and put to greater cost than responsible, compliant landlords as they will be given a reduced-term licence. Furthermore, we will use robust enforcement against wilfully non complaint landlords to ensure PRS properties are protected by the licensing scheme.
		Bad landlords will not apply and thus the council will not implement any changes		
		Rogue landlords with poor properties will continue to operate outside the scheme, while good landlords will pay a fee and obtain a license with no benefits to them or their tenants.		

Theme	Issue	Example Comment	Comment Source	Council Response
		This does feel all landlords are being tarred with the same brush and having to pay a license fee even if they are decent landlord and run properties professionally.		We will develop guidance and work with landlords to bring about compliance where possible, but we will also use robust enforcement against wilfully non-compliant landlords, creating a level-playing field for responsible landlords. As is outlined within the consultation supporting documents, licensing schemes are expected to see benefits for good, compliant landlords as the neighbourhoods in which they have properties improve and they are offered support in managing their properties effectively, including the enforcement of tenancy conditions to combat neighbourhood nuisance caused by tenants or people visiting their properties.
Target rogue landlords	Respondents suggested that the council should focus on targeting and penalising rogue landlords who are known to be providing substandard housing, rather than implementing a blanket scheme that affects all landlords.	*Enforce the rules already in place on landlords that do not do what they should and leave the good ones alone as much as possible, whatever government get involved with local or national they tend to make worse.* *Fine the slum landlord and reward the proper landlords it's SIMPLE* *But not enough money making for LBH*	Consultation survey comments, Safeagent letter	If approved, the Council will carry out inspections to find unlicensed properties and will take action against those who refuse to licence their properties. An independent agency on behalf of the government (An Independent Review of the Use and Effectiveness of Selective Licensing)[1] found that licensing "provides a clearly defined offence (licensed / unlicensed) which simplifies enforcement -

Theme	Issue	Example Comment	Comment Source	Council Response
		Licenses should be for poorly performing landlords only and not penalise the decent landlords. Focus on the landlords with compliments and spot check properties belonging to letting agents		and where a landlord is intentionally operating without a licence it is highly likely the inspection process will uncover further offences". Notably, in many cases, landlords may not be compliant as they are not aware of the legal requirements for or issues within their properties, and not because they are actively disregarding legislation. Licensing helps the council to work with all landlords to ensure a high standard of management and maintenance through education and collaboration. The council believes that licensing will enable them to work with landlords to raise standards of living in the borough and work to tackle the issues of poor housing conditions and ASB, by holding landlords to a high standard, and by carrying out inspections. Alongside the enforcement powers granted by licensing, the Council will also carry out a comms campaign to make landlords, tenants and residents aware of the licensing schemes, and raise awareness of how to report issues. 1-Selective licensing review - GOV.UK
		The highest priority should be tackling rogue landlords and agents (including "the minority of 'rogue' landlords who fail to invest in their properties" referred to in the evidence document) not policing the compliant.		

Theme	Issue	Example Comment	Comment Source	Council Response
Work collaboratively with landlords	Respondents suggest that the council should work collaboratively with landlords rather than treating them as adversaries, in order to improves housing standards and increase the supply of rental properties.	*1. Work closely with the good, reputable management agents* *2. Work closely with the good, reputable landlords* *3. Offer incentives/ discounts for those that comply and provide much needed good quality homes to our tenants and your residents* *4. Pursue and penalise poor performing agents and landlords* *5. Take feedback from tenants (when do you actually consult them in all of this?)*	Consultation survey comments, Propertymark letter	The Council is committed to providing robust support for landlords, and we have several measures already in place to ensure this. Our guidance for landlords, available on the Council's webpage, provides comprehensive information and advice to landlords to support them in meeting their obligations when letting a property. It is the Council's intention to use the regulatory framework provided by licensing to work with and educate landlords to bring about compliance, rather than take immediate enforcement action where non-compliance is found.
		The principle is wrong. Penalties are not the answer. The council should work together with private landlords in partnership to help ease the severe housing crisis		

Theme	Issue	Example Comment	Comment Source	Council Response
		Propertymark would prefer a regulatory framework, which seeks to educate landlords in improving their stock rather than punitive measures that are difficult to enforce and only punish compliant landlords letting those that require improvements to go undetected.		We particularly encourage landlords to become accredited to increase their professionalism in managing their properties. Through accreditation, landlords are able to achieve a level of knowledge and competence before letting a home, which is key to raising standards in the private rented sector. Accredited landlords will be eligible to receive a £100.00 discount on the licence fee. The Council will continue to provide landlords with detailed guidance on their legal obligations and responsibilities, both online and through landlord forums.
Work collaboratively with letting agents	Respondents suggest that the council should work collaboratively with letting agents.	*We welcome the council's stated intention to "work with landlords to help support them and build their professionalism". In pursuit of this aim, we would urge the council to fully recognise the compliance work reputable agents carry out as part of their day to day activities. We would also suggest that the council work closely with accredited agents, to proactively seek out and identify unlicensed properties.*	Safeagent letter, Propertymark letter	The council agrees with the premise of working closely with accredited letting and management agents and is indeed open to exploring ways for effective collaboration.

Theme	Issue	Example Comment	Comment Source	Council Response
		Therefore, we would like clarity on how Havering Council engages with landlords and property agents including landlord forums, and training opportunities. In addition, we would welcome clarity on how the council encourages landlords and agents to be members of an accredited membership scheme such as Propertymark.		

3.4 Anti-Social Behaviour

Theme	Issue	Example Comment	Comment Source	Council Response
Landlords' responsibilities for dealing with ASB and other tenant behaviour issues	Concerns were expressed about landlords' responsibilities regarding ASB and other tenant related behaviour. A feeling that this should be supported by the council and that tenants themselves have a responsibility to behave well.	*It's not the landlord's that cause the anti-social behaviour. They provide good quality newly fitted out house conversions but then accept unemployed tenants who have drink and/or drug problems. The government or council pay for their rent and council tax and the properties slowly but surely deteriorate because the tenants don't care or consider how much everything costs. The landlords understandably refuse to carry out repairs to damage and other problems and this has a knock on effect on the other tenants and neighbours and retail shops who suffer chronic theft levels.*	Consultation survey comments, Safeagent letter, NRLA letter	The Council understands that it is the responsibility of all residents in the borough not to partake in anti-social behaviour. The Council does not expect landlords to be solely responsible for the behaviour of their tenants, but the Council would expect landlords to meet the proposed licence conditions, which lay out how to help address issues with ASB in licensed PRS properties. The Council will work with landlords who are experiencing issues with tenants to address issues of ASB, including guidance on how to manage ASB caused by tenants. The Council would encourage landlords to include clauses in their tenancy agreements about ASB, and to manage their tenancies and ensure that ASB caused by their tenants is effectively addressed and if necessary appropriate action taken.
		Landlords do not have any control over how someone lives in their property. If the tenant puts the rubbish out at any time or does something to make the property look unsightly, or are antisocial, the Landlord cannot just evict them.		

Page 380		*It is unrealistic for landlords to monitor tenants' daily activities or sleeping arrangements. When it comes to addressing antisocial behaviour, landlords can only enforce the terms of the contract; they cannot control tenants' behaviour.*		The licence conditions give actions which landlords should take to indicate that they are dealing with ASB associated with their properties. Evidence presented to the Council may be used in claims for possession. The Council's (ASB) officers will work in partnership to support landlords in dealing with tenants causing ASB.
		Landlords lack the expertise to handle antisocial behaviour and are not equipped to address tenants' mental health issues or substance abuse problems. If a tenant is causing issues and the landlord decides to terminate the tenancy, they believe they have fulfilled their responsibilities, even if the tenant is struggling with these issues. This simply shifts the problem elsewhere in the Havering area, potentially leaving the tenant neglected or vulnerable to unscrupulous landlords, impacting other residents negatively.		
ASB and overcrowding	Difficulties for landlords to manage occupancy numbers.	*Additionally, overcrowding poses a challenge for landlords when tenants exceed the property's capacity. Landlords are responsible for informing tenants about occupancy limits and prohibiting subletting or additional occupants. What information and support can the council provide to support landlords in such situations?*	NRLA	The council believes there are steps that landlords can take to determine if a property has been sublet or overfilled. Additional HMO licence condition 16.2 requires that '*inspections of the HMO are carried out at least every three months to identify any problems relating to the management, use and occupation of the HMO and its condition and contents'* and selective licence condition 12.5 requires that *'inspections of the house are carried out at*

				least every six (6) months to identify any problems relating to the condition and management of the house. The NRLA's own guidance recommends that "inspections should be no less than every three months" The landlord's essential guide to periodic property inspections | NRLA The council does not believe that these inspections would impact the tenants' welfare. As stated above, the council will work in partnership to support landlords in dealing with tenants causing ASB.
Environmental crime	Clarity over the extent to which the ASB and enviro-crime referred to in the Evidence Pack is attributable to the PRS	*The evidence document has highlighted additional licensing as a tool to tackle environmental crimes such as fly tipping, poor waste, husbandry and street cleaning. The evidence document states "There is a connection between HMOs and poor waste management. All property licences contain a condition that the holder must provide adequately sized bins and sufficient recycling containers for the occupiers. While we welcome efforts to tackle fly tipping, unless the perpetrator is caught doing the fly tipping or there is some sort of evidence, such as an addressed letter,*	Propertymark letter	While it is not always possible to identify individual perpetrators of fly tipping, the licensing framework enables the Council to engage directly with landlords and managing agents to ensure that adequate waste storage facilities are provided, tenants are informed of their responsibilities, and waste management arrangements are clearly documented and monitored. This proactive approach contributes to a reduction in repeat waste-related incidents associated with licensed properties. We fully acknowledge that landlords cannot be held responsible for actions beyond their

		within the fly tip, then it is impossible to suggest to what extent fly tipping is a problem in the PRS. Even if the link between fly tipping and the PRS could be proved, there is very little that landlords could do for any behaviour outside the tenancy unless the fly tip was done within the grounds of the property.		control. However, through licensing, they are well positioned to set clear expectations, maintain appropriate property standards, and work collaboratively with tenants to prevent environmental issues. The Council's objective is not to assign blame, but to promote shared responsibility and improve the overall quality and cleanliness of neighbourhoods.

3.5 Administration of the proposed licensing schemes

Theme	Issue	Example Comment	Comment Source	Council Response
Council capability	Concerns expressed in the Council's ability to manage the licensing schemes effectively, raising doubts about its implementation and impact.	*Unless the council is willing to physically inspect every property, this scheme does not and will not make any difference.*	Public forum Q&A, Consultation survey comments	If the schemes are approved, the Council will enhance its enforcement capability proportionally to the number of licences anticipated. This forms part of the financial modelling of the schemes and includes implementing a recruitment and retention policy to manage the increased capacity needed for administration and enforcement of the schemes. Within the new scheme objectives, we have set ourselves challenging targets. Resources shall be prioritised to effectively deal with the properties of most concern and target enforcement actions to those landlords who fail to license their properties and/or breach licence conditions. The council will actively inspect for unlicensed properties and take action against those who refuse to license them. Proactive licence compliance inspections will also be conducted, and robust enforcement measures will be used against landlords who are wilfully non-compliant.
		I have seen NO improvement/impact from the current scheme, which seems to be an additional money making exercise from a cash strapped council that doesn't care about any of its residents		
		The introduction of a borough-wide scheme will require significant administrative capacity to process applications, conduct inspections, and enforce conditions. Without a substantial increase in staffing and funding, there is a real risk that enforcement becomes inconsistent or superficial, undermining the purpose of the scheme.		

Theme	Issue	Example Comment	Comment Source	Council Response
Delivering effective enforcement	Respondents emphasised the need for proper and efficient administration and, robust enforcement of the scheme	*Robust enforcement will be essential to the success of any licensing scheme, be it Additional* *or Selective. Tenants will need to be confident that any enforcement action required has been* *(or soon will be) carried out in respect of all licensed properties.*	Safeagent letter, Consultation survey comments	The Council agrees that efficient enforcement and proactive inspections are fundamental to the success of any scheme. That is why the financial model underpinning the scheme builds in enforcement and inspection officers ensuring that visits to PRS properties are routinely conducted, and appropriate enforcement action is taken where necessary. While the Council remains committed to an educational and supportive approach - particularly for landlords who are willing to comply - we will not hesitate to take firm action where there is clear and wilful non-compliance. This dual approach ensures that risk within the PRS is managed effectively, and that tenants living in PRS properties are afforded the protections the licensing scheme is designed to deliver.
		There are already regulations in place and minimums to achieve. Regulation without enforcement is pointless. Enforcing existing rules and regulations may be a better starting point and less onerous for bona fide landlords who already provide properties of a high standard.		
		There are laws in place already, they just need to be enforced. Which is a police issue not a landlord issue. Bad landlords will always be bad landlords.		
Use existing regulations and powers	Respondents expressed they felt that the current regulations around the PRS and powers granted to the Council were sufficient to solve any issues and that any additional	*A more effective approach would be to enforce current legislation consistently and focus on targeted action against genuinely poor landlords, rather than imposing blanket conditions that penalise responsible landlords and*	NRLA letter, Consultation survey comments	The council have considered a range of alternatives to selective and additional licensing, but do not believe they are as effective in dealing with poor property conditions and ASB in the borough.

Theme	Issue	Example Comment	Comment Source	Council Response
	regulations add an unnecessary layer of bureaucracy.	*drive up costs for everyone — including tenants.*		The current powers the council has, including the use of the Part 1 Housing Act 2004, do not require landlords to declare themselves. This means there is no obligation for landlords to make their properties known to the council or to be proactive in improving conditions, including minor issues (that may still pose a health and safety risk) but still need to be addressed, but which a tenant may not complain to the council about. Formal action under the Housing Act can be a slow process, and improvements to properties can take many months. In most cases it requires the council to serve a notice and it is only if that notice is not complied with, that the council can then take enforcement action.
		The current laws if enforced should be sufficient to protect tenants		
		The current framework—when properly enforced—is more than sufficient to ensure tenant safety, property standards, and responsible management. The issue is not a lack of regulation, but rather the enforcement of existing laws. Many problems in the private rental sector stem from a failure to target and hold non-compliant landlords accountable, not from an absence of rules.		

Theme	Issue	Example Comment	Comment Source	Council Response
Renters Rights Bill	The bill will provide much of what a PRSL scheme seeks to accomplish and that two parallel schemes are unnecessary.	*Furthermore, we think that both proposed schemes on a local authority level would be duplicitous with the provisions of a national landlord's registration scheme being proposed in the Renter's Rights Bill as outlined in the Kings Speech and is currently at the Report Stage in the House of Lords.*	Propertymark letter, Consultation survey comments, Public Forum Q&A	The council has carefully considered the proposals in the Renters Rights Bill. While the proposal includes valuable tools for local authorities, like the property portal, it is not a substitute for an additional HMO or selective licensing scheme. Additional HMO and selective licensing provide a locally tailored, systematic approach to improving housing standards. They are more than just a collection of information; they are a proactive means for local authorities to inspect privately rented housing without the need for tenant complaints. This facilitates targeted action where it is needed most, ensures property managers are fit and proper persons, and protects vulnerable tenants. The property portal will aid in the identification of unlicensed properties and
		I believe that the renters reform bill is and will raise tenant understanding of their rights.		
		This upcoming legislation will directly address many of the concerns selective licensing seeks to remedy — but in a more targeted and proportionate manner. Introducing a licensing scheme now, in advance of this major national reform, is premature and risks creating overlapping and confusing regulatory burdens.		

Theme	Issue	Example Comment	Comment Source	Council Response
				inform landlords about local activities. However, it will not directly improve property conditions and management. Certificates will still need to be checked for accuracy, and landlords can opt out of receiving notifications from the portal, limiting its impact. Recent government guidance[2] on the Bill states: *Selective licensing remains a valuable tool when used appropriately and combined with other measures. It enables local authorities to target the improvement of standards and*

[2] https://www.gov.uk/government/publications/guide-to-the-renters-rights-bill

Theme	Issue	Example Comment	Comment Source	Council Response
				safety in areas suffering from issues such as poor housing quality, high levels of deprivation and anti-social behaviour. It has the ability to drive better outcomes for local residents, tenants and responsible landlords. *Our plans to deliver a Database will provide access to information about privately rented properties and tackle one of the biggest and most time-consuming barriers faced by local councils when enforcing standards – identifying poor quality and non-compliant properties and who owns them.* *We will work with local councils to gather more information about their selective licensing schemes to ensure the schemes are continuing to deliver the intended outcomes.* In conclusion, while the portal and other parts of the Renters Rights Bill will provide a valuable source of information on the sector, additional HMO and selective licensing schemes are still necessary. They ensure effective regulation and improvement of the private rented sector, providing a comprehensive solution that addresses the unique challenges of each local authority area. The Council supports the implementation of both tools in tandem to achieve the best outcomes for landlords, tenants, and local communities.

Theme	Issue	Example Comment	Comment Source	Council Response
Public Register	Respondents emphasise the need for a publicly accessible register of landlords and PRS properties and a review system where tenants provide feedback on their rental experiences.	*Centrally store an online list of all HMO landlords that is open to the public.*	Consultation survey comments	It is a legal requirement for the Council to maintain a public register of all licensed properties in the borough. You can currently search for licensed HMO properties at Landlord licence public register | Havering Council Information about private landlords and letting agents who have been prosecuted or fined can be found by searching the Mayor of London's Rogue Landlord and Agent Checker. This contains information about landlords and agents who have been: • prosecuted or fined by London boroughs for housing-related offences • prosecuted by the London Fire Brigade for fire safety offences • expelled by one of the agency redress schemes
		The new Renters Rights Bill will require a landlords register. What does you proposed selective licensing add to this register?		
		Nothing is monitored by the council, in fact they dont visit the majority of licenced properties. *It is a ridiculous idea just to make money, you could just as easily have a register the like of which will come in with the renters reform bill in October and the licence will not be needed.*		
Complaint reporting methods	Suggestions for measures to protect tenants such as providing a way for tenants to report issues.	*Create a direct line service where tenants can report the rogue landlord to the Council*	Consultation survey comments	There are a number of ways for tenants, to get in touch with the team to report properties they are concerned about, or

Theme	Issue	Example Comment	Comment Source	Council Response
		Create a database of the landlords in the area instead of charging us for licenses and allow the tenants to report serious problems.		specific issues with a property. This includes a dedicated email to report issues, a licensing telephone line to speak to officers and an online reporting form on the Council's website. Private tenants services and information - Havering Council The council is committed to addressing complaints and will maintain this commitment within the framework of the licensing schemes. However the current process of reacting to complaints relies on complaints being made to the council and does not encourage landlords to be proactive. The council believes that a proactive approach will have a greater impact on improving property conditions and will increase the awareness of tenants of acceptable standards in privately rented properties.
		You could create a direct service where a tenant reports a rogue landlord.		
Transparency and accountability in licensing outcomes	If the scheme is approved an annual review should be undertaken and made publicly available.	*If the scheme is approved, the Council should consider providing an annual summary of outcomes to demonstrate to tenants, landlords and letting agents' behaviour improvements and the impact of licensing on the designated area over the scheme's*	Propertymark, NRLA, Consultation survey comments	We agree that transparency and accountability are essential to building trust and demonstrating the value of the scheme to all stakeholders, including landlords, letting agents, tenants, and the wider community. The Council is committed to monitoring the impact of the scheme and

Theme	Issue	Example Comment	Comment Source	Council Response
		lifetime. This would improve transparency overall.		recognises the importance of sharing this information in a clear and accessible way. In accordance with the Housing Act 2004, we will review the operation of any designation made from time to time. In line with best practice guidance set out in the Selective Licensing General Approval, we will publish the outcome of any reviews undertaken on our website.
		However, there is a significant lack of transparency regarding how the monies collected from landlords have been spent and how effective this expenditure has been in achieving the stated aims of the scheme.		
		If the proposed scheme is approved and put into action, the council should provide an annual summary of outcomes to showcase the improvements in tenants' and landlords' behaviour and the impact of licensing on the designated area throughout the scheme's duration. This would enhance overall transparency.		

3.6 General comments about the licensing scheme proposals

Theme	Issue	Example Comment	Comment Source	Council Response
Uneven application across borough	Suggestions that licensing should only target problem areas or properties and should not be applied broadly across the whole borough.	*Again this MUST cover all of Havering.* *I would look to raise a formal objection if this doesn't cover the entire borough*	Consultation survey comments, Public Forum Q&A	The council can only introduce selective licensing in areas in the borough where there is evidence that the area meets the criteria as laid out in section 80 of the Housing Act 2004 and the Selective Licensing of Houses (Additional Conditions) (England) Order 2015. The council carried out a detail analysis of the PRS and guided by the evidence, the council has been selective in proposing which wards would be covered by the scheme. The evidence supported a selective licensing scheme based on poor property conditions in seven out of 20 wards. The Council will continue to monitor those wards not included in the selective licensing scheme and should the evidence change then consideration will be given to introducing a third designation.
		I agree with the scheme but in my opinion it should apply to all areas. While concentrating on these seven areas, the others will continue to go downhill.		
		I think it should be rolled out across the whole borough so that expectations are made clear to all and that the issues are not just moved to another area and eventually the whole of Havering becomes a neglected and deprived looking area. It is already creeping in across the borough and it needs to be stopped. It is much easier to act now than trying in hindsight to remediate because the damage has already been done. It takes far too long to bring an area back up. It took the Olympics to change Stratford, we don't have that.		

Theme	Issue	Example Comment	Comment Source	Council Response
		The selective licensing scheme should be enforced across ALL landlords in Havering and those that demonstrate good management/maintenance over a set period of time will earn exemption from the licensing fee. Would that not be a fairer approach?		
Evidence base flawed	Respondent raises concerns about the Metastreet predictive modelling methodology.	*I'm really struggling to agree that sufficient numbers and data are in the evidence pack to support a licensing scheme as the right approach compared to other options. How do we request further empirical data is obtained to support this proposal, including comparing to other sectors, other alternatives, other regions etc... Furthermore, how success will be measured?*	Consultation survey comments, Public Forum Q&A	The Metastreet's Tenure Intelligence (Ti) methodology is clearly outlined at page 58 of the Housing Stock Condition and Stressors report (Consultation Evidence Pack Appendix 1). Ti uses a wide range of data and machine learning in combination with expert housing knowledge to accurately predict a defined outcome at the property level. Council and external data have been assembled as set out in Metastreet's data specification to create a property data warehouse. This includes various data sources and is not based solely on where 'action' has been taken by the council. All results have been carefully analysed by skilled practitioners
		The proposal targets seven wards based on "poor housing conditions," but the consultation documents do not provide robust, ward-specific evidence to justify this under the Housing Act 2004.		

Theme	Issue	Example Comment	Comment Source	Council Response
				Predictive modelling has been used in this field for almost 20 years specifically for the purpose of understanding housing stock condition as required by Housing Act 2004 Part 1, section 3. Many councils have progressed to using modelling to understand whether areas would benefit from property licensing, support the introduction of property licensing and increase property licensing compliance. The Council has contributed information to and thoroughly examined the predictive data produced and is confident in the reliability and robustness of the information.
Issues in Council and housing association properties	Respondents expressed that they believed the primary issues within rented properties were primarily related to properties owned/managed by Councils and housing associations.	*You should look at the state of your own social housing first, but hey, that doesn't matter to you.* *Anti-social behaviour is caused by council tenants and emergency accommodation tenants placed in social housing. However, the council use private landlords as the scapegoat for their own failings and as a revenue generator to keep public sector workers in employment.* *Tackle social housing and council housing first before trying to go after private landlords.*	Consultation survey comments, Public Forum Q&A, Propertymark letter	The licensing proposals are set in the context of the council's wider programmes to tackle housing need, increase sustainability, improve property standards and reduce ASB. Licensing is part of the council's wider strategy to improve the lives of residents in the borough. Like many areas, Havering is under increasing pressure to find suitable temporary accommodation for families. The

Theme	Issue	Example Comment	Comment Source	Council Response
		The licensing scheme is ineffective at improving standards.		Havering *Prevention of Homelessness and Rough Sleeping Strategy 2020-25* comprehensively sets out Havering's approach, based around four objectives: **Objective 1:** End long-term rough sleeping **Objective 2:** Reducing the number of people in temporary accommodation **Objective 3:** Supporting people who become homeless **Objective 4:** Provide good value, integrated services that deliver excellent customer care. Whilst the council acknowledges that all property types may have issues with poor property conditions, licensing is a tool available for the council to use to address these issues solely in the PRS. Properties let by a local authority or a Registered Provider (housing association) are exempt from licensing by law and thus any issues with these types of properties must be dealt with separately.
		We note that in some communities within the London Borough of Havering, the percentage of social housing is greater than the percentage of PRS housing. Therefore, it is likely that any social problems within this area are contributed by social housing.		
		Private landlords are not the issue. Council houses are not up to scratch - poor hygiene, safety etc. However, the same rules don't apply to the council as landlords. The council don't have to comply with any regulations, whereas landlords are having to comply more and more. Many good landlords have sold up, which means rents rise as a result. You put more pressure on the existing landlords,more will leave putting more pressure on council houses (which there are none). *Also residents are also responsible for cleaning their council houses/private rentals, aswell as opening windows to reduce mould etc. They should be fined if they don't. Problem will just get worse for havering residents if you keep attacking landlords. A lot more homelessness as a result.*		

Theme	Issue	Example Comment	Comment Source	Council Response
Short-term lets	Respondents expressed desire for the inclusion of short-term lets/Airbnb properties within the scheme	*Air b and b. Property owners must get permission from the council if they rent over a set number of days per year. Inline with London rules if they do not get permission and rent over the set number of days they should be fined. There is no deterrent at present and air b and b properties can rent illegally as the council procedure to deal with them is too slow.* *SHOULD APPLY TO AIR B & B LETS AND HOLIDAY LET S* *SHORT TERM LETS* *Air B&B some are used as rentals for long periods. Should be 100 % regulated in line with rentals and HMO's*	Consultation survey comments	Properties let through Airbnb are short-term lets and do not legally fall within the licensing schemes which apply to longer term rentals. However, Airbnb properties may require planning permission for change of use if the property is rented out frequently. Generally require planning permission if let for over 90 nights per year Guidance on short term and holiday lets in London | London City Hall The Council will continue to monitor short-term lets and respond to issues caused by Airbnbs, such as noise complaints using appropriate legislation.
Council tax as an alternative to licensing	Respondents suggested the use of council tax records as an alternative to licensing	*The NRLA proposes the utilisation of council tax records to identify the tenures utilised by the private rented sector and the landlords responsible for these properties. Unlike discretionary licensing, this approach does not require landlords to self-identify, making it more challenging for criminal landlords to operate*	NRLA	The council has considered a range of alternatives to selective and additional HMO licensing, but do not believe they are as effective in dealing with poor housing conditions or ASB in the borough (Please see Section 13 of the Consultation Evidence Pack).

Theme	Issue	Example Comment	Comment Source	Council Response
		unnoticed. By adopting this method, the council would not need to immediately consult and implement changes.		
Overall opposition to HMOs in the borough	Respondents expressed general dissatisfaction with the state of HMOs and perceived growth in the HMO tenure within the borough	*Cut down on the number HMO'S . We have enough problems in Romford as it is. Just go to Romford station bus stops about 6.00pm and see what we have to put up with. It's disgraceful.*	Consultation survey comments	HMO planning and HMO licensing are separate regimes, and their legislative requirements are quite different. Small HMOs (between 3 and 6 unrelated occupiers) have permitted development rights. The Council has no legal grounds to take action or stop the development where change of use is 'permitted'. Property licensing schemes do not result in increased numbers of HMOs, but they do seek to improve the management and standards of the HMO properties already in existence. The Council believes, therefore, that those areas with large numbers of HMOs will continue to see the benefits of additional HMO licensing that a further scheme would bring. The licensing scheme will enable issues of overcrowding within HMOs to be addressed. There are specific licence conditions relating to the maximum occupancy of both the property and the rooms within it. Licence-holders are required to inspect their properties every three months. This must include evidence of
		Flooding the London Borough of Havering with HMO will see a decline in the area, encouraging the wrong type of people into the borough, this will effect the cleanliness of the borough, and also increase burglaries, as you will be moving anyone in the area. Which is mainly middle class hard working people.		
		Just totally ban ALL HMO properties. Living near one I can say, they are not looked after, the landlords couldn't care less who lives in them, the people cause all sorts of disturbances, there is a constant stink of cannabis, there is rubbish strewn all over the place outside, lost count of the number of police attendances. they drag the standard and quality of life of all others down, this borough is looking more and more like some inner city cess pit of a dump.		

Theme	Issue	Example Comment	Comment Source	Council Response
				checks that the HMO is being occupied by the level of occupancy specified in the licence.
Support for landlords dealing with tenant-related issues	Respondents emphasised a need for guidelines and support for landlords on how to handle tenant-related problem	*Propertymark would like clarification on Havering Council's policy concerning helping a landlord when a section 21 notice is served, the property is overcrowded, or the tenant is causing antisocial behaviour, as per the council's consultation. What steps will the council take to support the landlord? It would be useful if the council were to put a guidance document before introducing the scheme to outline its position regarding helping landlords remove tenants who are manifesting antisocial behaviour. The recent proposed changes to section 21 legislation and how tenancies if implemented could mean landlords will become more risk-averse to taking tenants with a perfect reference and history. We would be willing to work with the council and develop a dispute resolution service with other local authorities.*	Propertymark letter	The Council will work in partnership to support landlords in dealing with tenants causing overcrowding or persistent ASB. Licensing Officers will work closely with the Homelessness Prevention team to support landlords and tenants to sustain tenancies. However, where the sustainment of tenancies is not possible landlords are advised to seek legal advice before taking steps to seek possession of their property.

Theme	Issue	Example Comment	Comment Source	Council Response
Overall opposition to schemes	Respondents expressed an overall disagreement the introduction of the proposed schemes	*While the NRLA shares a common interest with Havering in ensuring a high-quality private rented sector, it strongly disagrees that further selective and additional licensing is the most effective approach to achieve this goal in both the short and long term.*	NRLA, Consultation survey comments	Whilst the Council understands that some stakeholders may disagree with the proposal to introduce selective and additional HMO licensing, the Council has provided evidence of the need for selective and additional HMO licensing to tackle persistent issues with poor housing conditions and ASB. The Council can only introduce selective and/or additional licensing in areas in the borough where there is evidence that the areas meet the criteria as specified by the Housing Act 2004. The council carried out a detail analysis of the evidence available and has been selective in proposing designations for areas that meet the criteria of poor housing conditions and ASB.
		I respectfully disagree with the proposals—not because I oppose proper oversight or high standards in the private rental sector, but because I believe the current approach misplaces responsibility. The vast majority of landlords are already responsibly managing their properties, ensuring safe, compliant, and well-maintained homes for their tenants.		
		In the strongest possible terms, I oppose both the introduction of this licensing scheme and the extortionate fees proposed.		

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Promoting good private sector housing for local people

Additional HMO and Selective Licensing proposals

Evidence for consultation 2025

Havering LONDON BOROUGH

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Glossary

Term	Meaning
Private rented sector (PRS)	The portion of housing in the borough that is rented from private landlords
Privately rented	Homes rented from a private landlord
Socially rented	Homes rented from the Council or a housing association
Selective licensing	A discretionary licensing scheme which requires landlords to have a licence to legally let their property to a family or no more than two unrelated sharers
Additional Houses in Multiple Occupation (HMO) Licensing	A discretionary licensing scheme which requires landlords to have a licence to legally let eligible HMOs occupied by three or four unrelated persons living in two or more separate households sharing one or more basic amenity, which fall outside the scope of Mandatory HMO licensing
Mandatory Houses in Multiple Occupation (HMO) Licensing	A national scheme which requires landlords to have a licence to legally let eligible HMOs occupied by five or more unrelated persons living in two or more separate households sharing one or more basic amenity
Designation	A geographical area chosen for licensing that meets relevant legal tests
Housing Health and Safety Rating System (HHSRS)	A Government prescribed system that rates housing hazards based on their risk to occupiers' health, safety, and welfare
Category 1 hazard (Category 1)	The most serious hazards under the HHSRS, which include immediate risk to a person's health, safety and welfare
Category 2 hazard (Category 2)	Less serious hazards under the HHSRS. Whilst considered less serious they can still be regarded as placing the occupiers' health, safety and welfare at risk.
Statutory notice	A legal document issued by the Council that requires the recipient to complete specified actions within a specified timeframe
Anti-social behaviour	Behaviour related to the occupiers of, and/or visitors to, a

Term	Meaning
(ASB)	rented property that causes nuisance, annoyance and irritation to neighbours and the community. Most commonly noise, litter and waste
Deprivation	Living on low income and not having the money to pay for some basic requirements.
Indices of Multiple Deprivation	A dataset produced by the government to give a relative value to how deprived an area is, compared to the rest of the country.
Barriers to housing and services	One of the government's measures of deprivation. It combines measures relating to housing affordability, overcrowding and homelessness.
Minimum Energy Efficiency Standard (MEES)	Regulations that set a minimum energy efficiency standard (EPC rating of E) that applies to privately rented properties.
Energy Performance Certificate (EPC)	EPCs rate how energy efficient properties are using grades from A to G (with 'A' the most efficient grade).
Accreditation	Schemes overseen by various organisations, including local authorities and landlord associations, to provide training and encourage good practice by private landlords.

1 Executive Summary

Havering Council is committed to creating a fairer private rented housing sector by improving the condition and quality of properties in the rental market and developing a fair environment for both tenants and responsible landlords, targeting rogue operators and those letting unsuitable properties, driving up standards to the benefit of all. To achieve this, we are consulting on new licensing proposals for the private rented sector (PRS) in the borough. Property licensing is a way of ensuring safer and better standards in private rented homes.

Havering is consistent with the rest of London in that it has a shortage of affordable housing, with house prices remaining out of reach for many. The demand for social housing far outstrips the supply. As a result, private rented property is increasingly becoming the only viable option for many Havering residents, including those who are vulnerable and on low incomes. Currently, 19.3% of Havering's housing stock is in the PRS, and this is expected to continue to rise in the future.

While the majority of properties in the PRS are well maintained and safe, there is a growing number of properties that are substandard and potentially dangerous. Even landlords with good intentions may not always be aware of the latest legal and safety requirements. These properties pose a risk to the health, safety, and wellbeing of tenants, cause issues with neighbours, and require numerous interventions from council teams that are already under pressure. It is crucial for the Council to utilise all available tools to improve the situation for tenants renting properties in this sector. Licensing plays a key role in this effort.

Through the administration and enforcement of Havering's current selective, additional and mandatory licensing schemes, the Council has made strides in improving standards in the PRS. These schemes have provided a regulatory framework requiring landlords to proactively manage and maintain their rented homes through conditions attached to approved licences. Havering private rented homes have been improved since the first additional and selective licencing schemes came into force in 2018 and 2021 respectively through a combination of working with landlords and agents informally and the taking of formal action where necessary.

Despite these improvements, private renting continues to be a necessity rather than a choice for many tenants due to factors such as lack of rent controls and security of tenure. While the Council has improved a large number of privately rented homes, the worst housing conditions are still likely to be experienced by tenants who rent privately, and communities are more likely to be adversely impacted by issues arising from poorly managed privately rented properties.

In order to build on the achievements of the current schemes, the Council is proposing, subject to consultation, to implement new property licensing schemes when the current additional (HMO) and selective licensing schemes expire on 24 January 2026 which would include:

- borough-wide HMO additional licensing scheme – this would apply to all HMOs except those that require a mandatory HMO licence.
- selective licensing scheme for all privately rented homes (excluding HMOs) within seven wards to address the prevalence of poor housing conditions.

These schemes would be implemented concurrently and can be approved by the Council's Cabinet and could be implemented early 2026.

Whether you are a tenant, landlord, managing or letting agent, business, service provider, local authority, voluntary organisation, local resident or another key stakeholder in Havering or a surrounding area, this is your chance to have your say on private rented property licensing in Havering.

2 Introduction

This consultation document provides information about the scale of problems relating to poor housing conditions and poor property management in Havering's private rented sector and the evidence to support the Council's proposal to introduce new licensing schemes. It also provides a detailed description of the proposed licensing schemes, licence conditions, fees and scheme objectives.

We want to know your views on our proposals before any final decision is made about the future of property licensing in Havering. We are keen to hear from all those who are likely to be affected by the proposals, including local tenants, landlords, managing agents and members of the community who live, operate businesses or provide services in the proposed designated areas and/or the surrounding areas.

We would encourage you to complete our online survey by visiting: https://www.havering.gov.uk/prs

We shall also be holding a number of forums during the consultation period. If you are interested in sharing your experiences and views, please email prsconsultation@havering.gov.uk

The consultation will run for 12 weeks from 14 April to 6 July 2025.

For further information about the proposed new licensing schemes, assistance with completing the questionnaire or to request a paper copy of the consultation please contact:

- Email: prsconsultation@havering.gov.uk
- Telephone number: 01708 433 890
- Address: London Borough of Havering, Town Hall, Main Road, Romford, RM1 3BB

Once the consultation has closed the Council will review the replies. A full consultation report, including the Council's response to any alternatives suggested, will be published on the property licensing pages of the web site.

3 The private rented sector in Havering

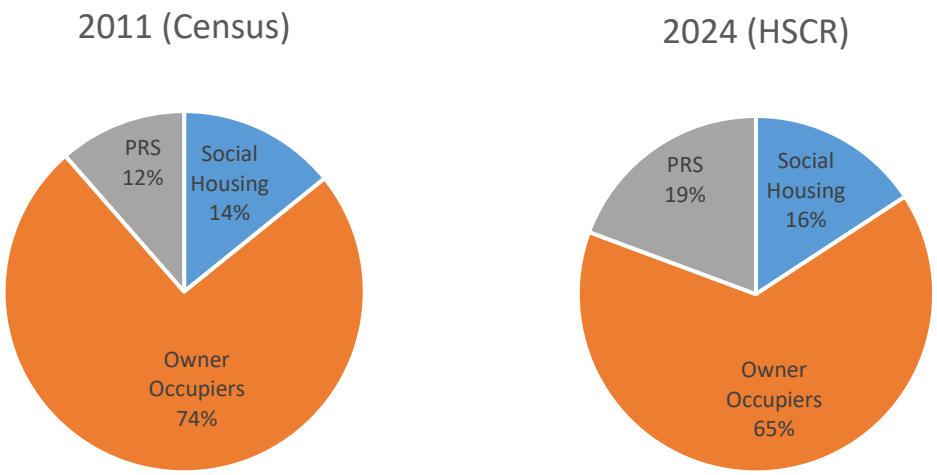
In order to obtain a greater understanding of the private rented sector in Havering, the Council worked with internal and external agencies to review multiple intelligence sources relating to the housing stock in the borough, undertaking analysis to provide estimates of:

- current levels and breakdown of PRS properties and tenure change over time
- levels of serious hazards that might amount to a category 1 hazard (HHSRS)
- other housing related stressors, including service demand, population and deprivation linked to the PRS.

The full results are presented within the Housing Stock Conditions Report (HSCR), which is attached as **Appendix 1** however, some key findings from the report are detailed below.

3.1 Housing tenure

Consistent with the long term nationwide and regional trend, the PRS in Havering has grown steadily from 11.5% in 2011 to 19.3% in 2024. This represents a 68% increase over the last 13 years. There are a total of 109,048 residential dwellings in Havering, 21,082 of which are privately rented.

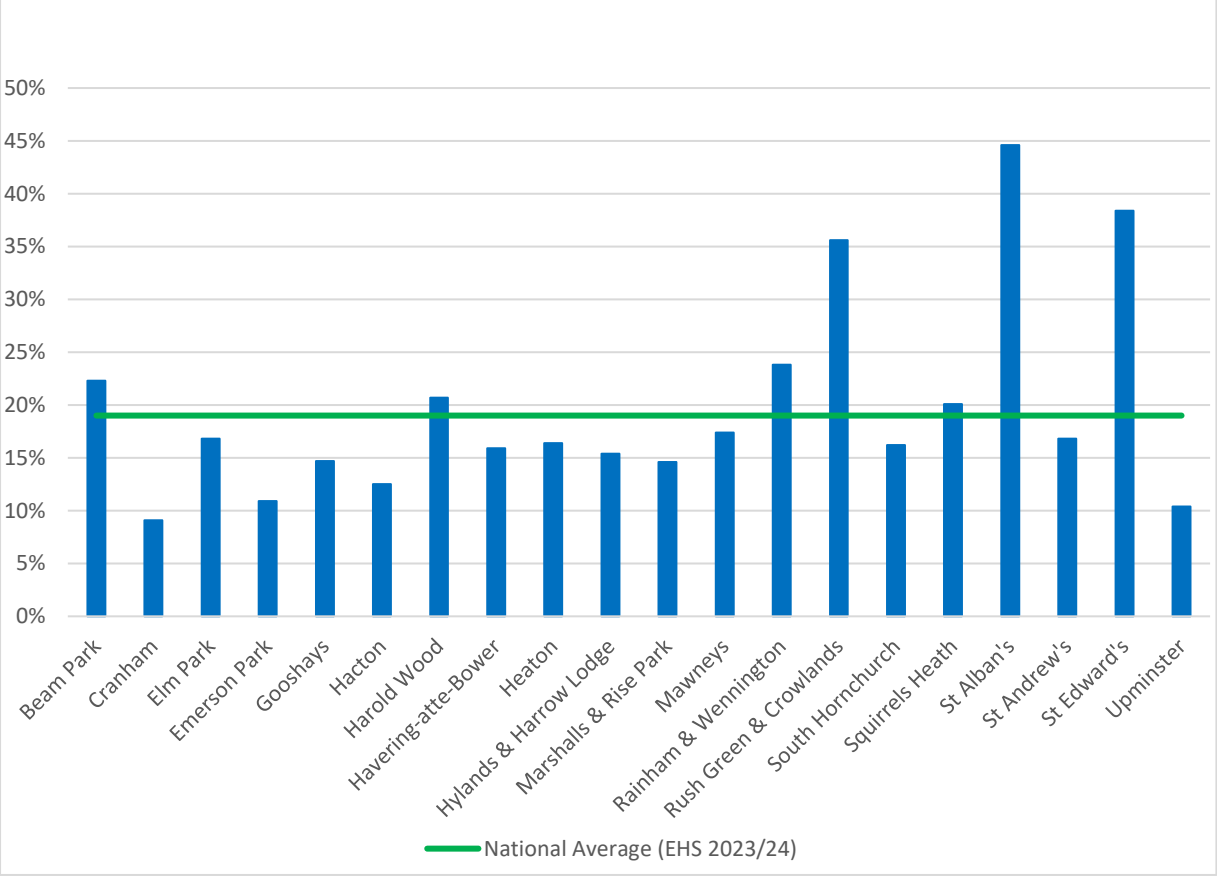


Tenure profile 2011 & 2024 (Source: ONS & Metastreet HSCR 2024).

Tenure	2011 (Census) (Households)	2021 (Census) (Households)	2024 (HSCR) (Dwellings)
Social housing	13,799	13,807	17,211
Owner occupiers	72,284	71,355	70,755
PRS	11,116	16,114	21,082
Total	97,119	101,276	109,048

Number of households & dwellings by tenure 2011, 2021 & 2024 (Source: ONS & Metastreet Ti 2024).

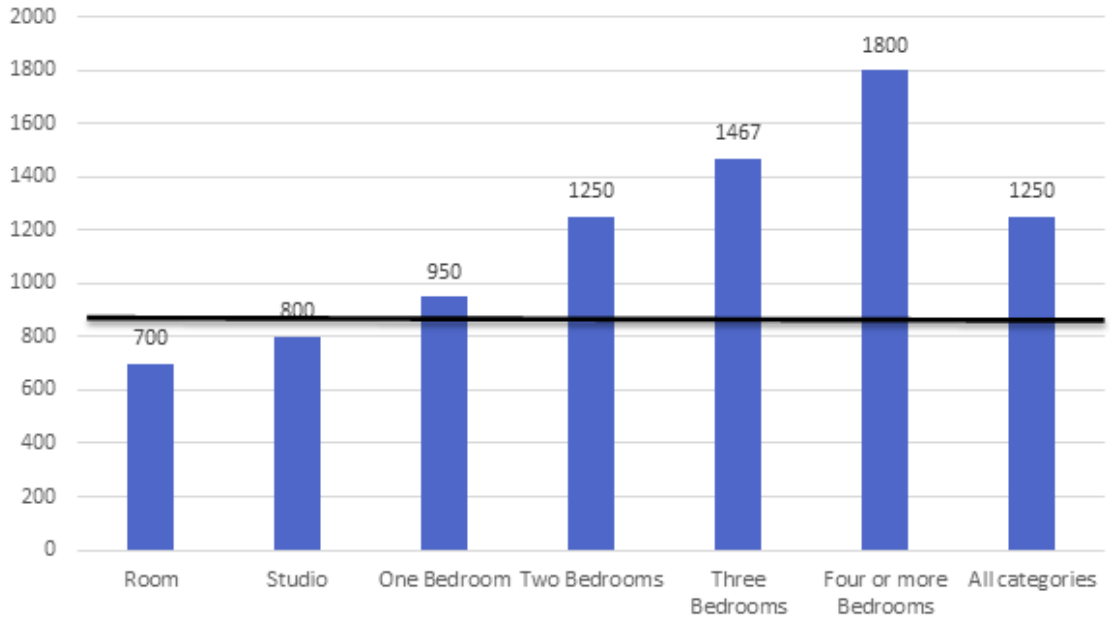
The PRS in Havering is distributed across all 20 wards. The number of PRS properties per ward ranges from 2235 (Rush Green & Crowlands) to 387 (Emerson Park). The percentage of PRS properties in each ward ranges between a maximum of 44.6% (St Albans) and a minimum of 9.1% (Cranham). Therefore, 7 out of 20 Havering wards have an equal to or higher percentage PRS than the national average in 2024 (19%). The average rate of PRS across all wards is 19.3%.



Percentage of PRS dwellings by ward (Metastreet HSCR 2024)

3.2 Rent and affordability

One of the major changes to the PRS across London over the last 20 years has been the increase in rent. This has resulted in residents not being able to afford and access decent, affordable housing. Havering has above average rents nationally with 33.2% of median earnings used to pay rent. The national average is 25%.



Median monthly rents (£) (1 April 2022 to 31 March 2023) (all categories) (Source: VOA 2024). Horizontal black line shows national average (£825). Horizontal red line shows London average (£1,625).

3.3 Deprivation

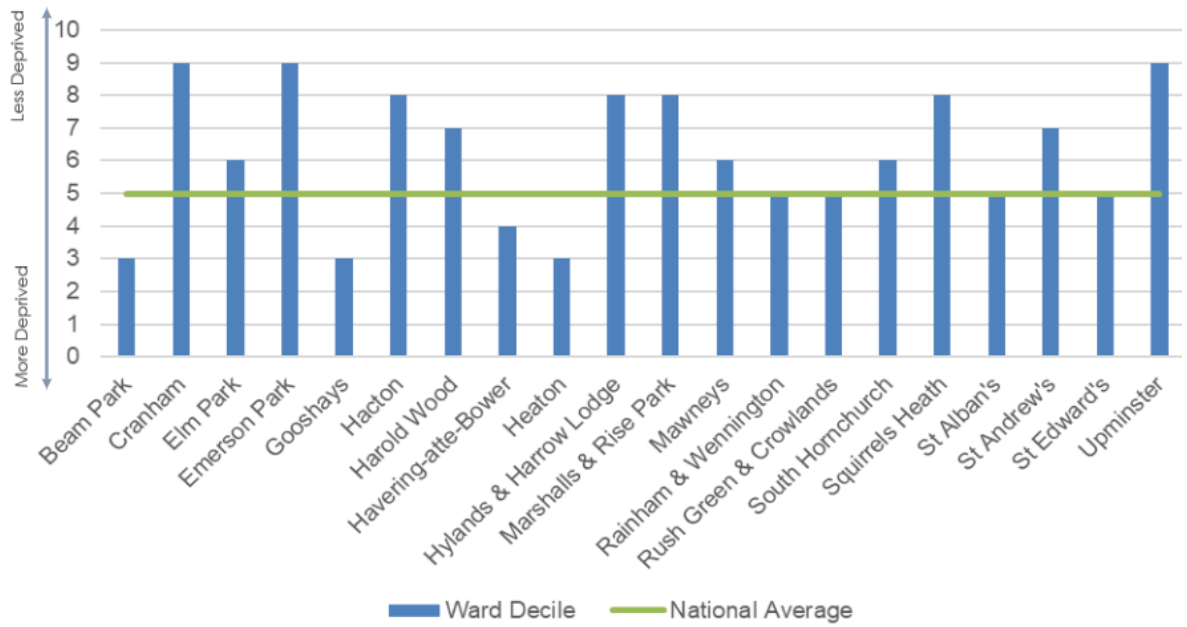
The indices of multiple deprivation (IMD) is a measure of relative deprivation for small areas (Lower Super Output Areas [LSOAs]), based on seven domains of deprivation:

- income
- employment
- education
- health
- crime
- living environment
- barriers to housing and services.

Havering ranks as the 179th most deprived borough in England out of 317[1]. Havering

[1] English Indices of Deprivation 2019 (ONS)

has a mixture of high and low deprivation wards with 4 of 20 wards having an aggregated IMD ranking below the national average. On this scale, 1 represents the most deprived and 10 represents the least deprived.



Average IMD decile by ward (ONS 2019)

3.4 Fuel poverty

Fuel poverty in England is measured using the Low-Income Low Energy Efficiency (LILEE) indicator. Under this indicator, a household is considered to be fuel poor if they are living in a property with a fuel poverty energy efficiency rating of band D or below and when they spend the required amount to heat their home, their disposable income is below the official poverty line.[2]

In general, fuel poverty relates to households that must spend a high proportion of their household income to keep their home at a reasonable temperature.

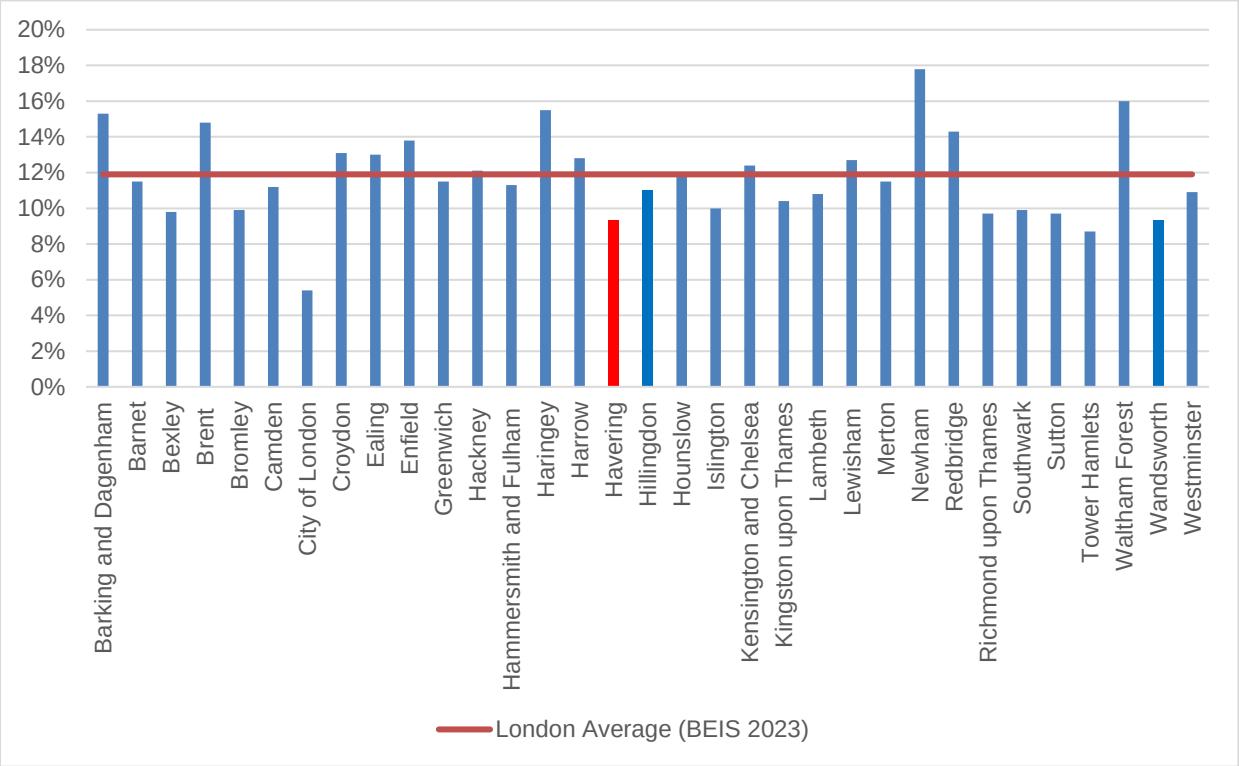
Fuel poverty is affected by three key factors:

- a household's income
- fuel costs
- energy consumption (which in turn is affected by the energy efficiency of the property).

The fuel poverty score produced by the Department for Business, Energy & Industrial Strategy (BEIS) using 2021 data and published in 2023 shows that

[2] https://www.gov.uk/government/collections/fuel-poverty-statistics#2022-statistics

currently Havering has a slightly lower proportion of households in fuel poverty (9.3%) than the London average (12%).[3] These figures are likely to significantly change at the next point of publishing as a result of the 2022 acute fuel price increases.



Percentage of households in fuel poverty by London Borough (BEIS 2023)

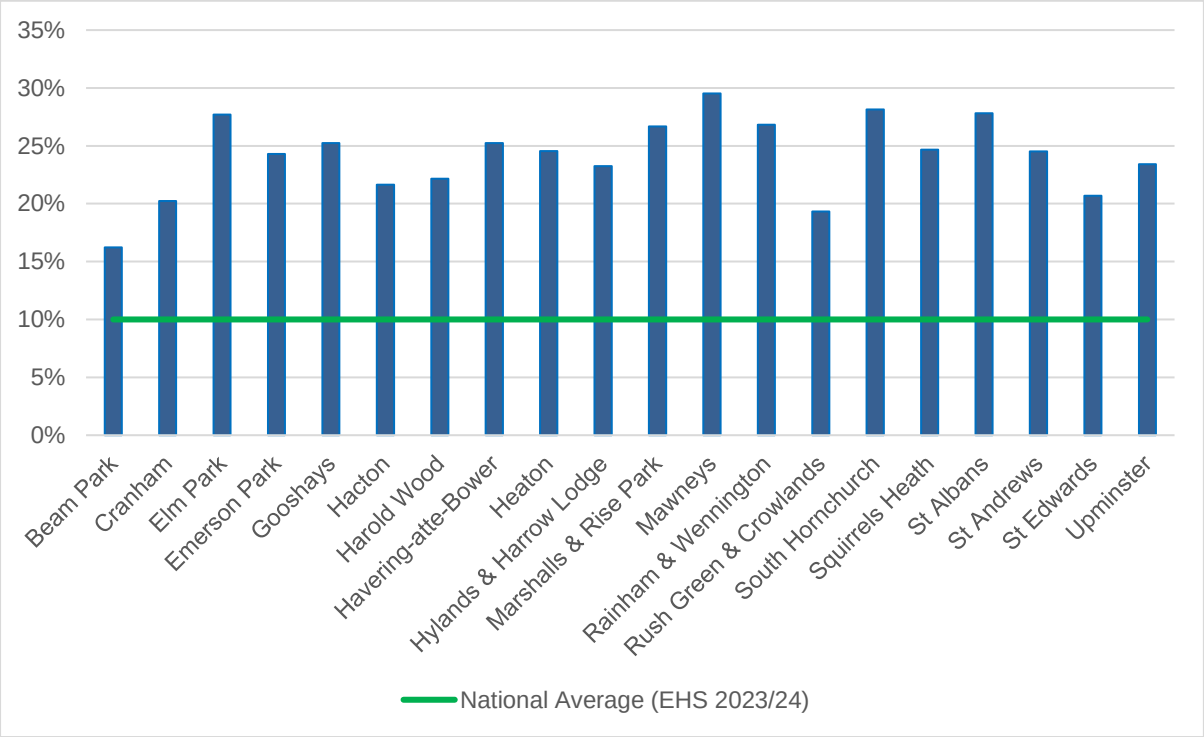
3.5 Housing conditions

The recent review of Havering's housing stock has provided insights about the presence and distribution of a range of housing factors in the borough[4], this was developed independently by Metastreet Ltd who implemented a stock-modelling approach based on metadata and machine learning to provide insights about the prevalence and distribution of a range of housing factors. This approach has been used by several councils to understand their housing stock and relationships with key social, environmental, and economic stressors.

The main finding was that poor property conditions are likely to be widespread in the PRS. Under the HHSRS, category 1 hazards are the most serious housing hazards and may result in the immediate risk to a person's health and safety. A significant category 2 hazard, although less serious or less urgent, can still be regarded as placing the occupiers' health, safety and welfare at risk.

[3] Sub-regional fuel poverty data 2023 (2021 data) - GOV.UK
[4] Housing Stock and Stressors Report, Metastreet, 2024

Our evidence shows that serious hazards (Category 1 and high scoring Category 2, HHSRS) in Havering's PRS are likely to be distributed across the whole borough, with 5,058 private rented properties (including HMOs) predicted to have at least one serious hazard, representing 24% of Havering's PRS. All wards have predicted rates of serious hazards above the national average (10%).[5]



Predicted percentage of PRS properties with at least one serious hazard (HSCR 2024)

[5] English Housing Survey 2023 to 2024: headline findings on demographics and household resilience. - GOV.UK

4 Types of property licensing scheme

4.1 What is property licensing?

Where the relevant legal test is met, property licensing allows the Council to regulate private rented properties in their area by issuing a licence to the person responsible for the property, usually the landlord. The aim of such schemes is to improve the private rented market by ensuring that the licence holder is a 'fit and proper' person to hold the licence, and that the property is of a decent standard for a landlord to rent out.

Licences come with conditions that relate to the occupation, use and management of the property. Some of these conditions are mandated by Government, however the Council has scope to add its own conditions that are tailored to dealing with specific problems in the designation relating to the private rented sector.

The Housing Act 2004 sets out three types of property licensing schemes and prescribes how the Council can implement them.

4.2 Mandatory HMO licensing

The Housing Act 2004 introduced mandatory licensing for certain privately rented houses in multiple occupation (HMOs). Generally, these are larger HMO properties occupied by five or more persons living in two or more households, and where those persons share facilities, such as kitchens/bathrooms/WCs. All local authorities in England must operate a mandatory HMO licensing scheme.

For the purpose of this consultation, mandatory HMO licensing is not being considered.

4.3 Additional HMO licensing (discretionary)

The Housing Act 2004 allows local authorities to designate areas as being subject to an additional licensing scheme, in relation to some or all of the houses in multiple occupation (HMO) in that area, which are not already subject to mandatory HMO licensing, for a period of up to five years. Generally, these are smaller HMO properties occupied by three or four persons living in two or more households, and where those persons share facilities, such as kitchens/bathrooms/WCs.

Additional licensing can also include properties converted into flats known as Section 257 HMOs. These are buildings which have been converted into and consist entirely of self-contained flats where less than two thirds of the flats are owner-occupied, and

the conversion into flats did not comply with the appropriate building regulations.

4.4 Selective licensing (discretionary)

A selective licensing scheme for all other privately rented properties and not just HMOs can be implemented in selected or ‘designated’ areas for a period of up to five years. A selective licensing designation can only be made if the designated area has a high proportion of properties in the PRS and is experiencing one or more of the following criteria:

- low housing demand (or is likely to become such an area)
- a significant and persistent problem caused by ASB
- poor housing conditions
- high levels of migration
- high levels of deprivation
- high levels of crime.

5 What are the benefits of property licensing schemes?

Property licensing schemes offer benefits to landlords, tenants, the wider community and the Council. These include the following:

Benefits to tenants

- Through conditions that accompany any granted licence, licence holders are required to proactively manage and maintain their rented homes.
- Licensing improves the standard of private rented properties. This makes properties safer for tenants who occupy them.
- Licensing allows a local authority to adopt a much more proactive approach to tackling poor housing conditions and raising standards in private rented housing.
- Licensing encourages good practices – if a landlord is not able to demonstrate that they comply with fire, gas and electrical safety conditions, a licence will not be granted.
- Many people who are vulnerable, disabled and living on low incomes rely on private renting. Licensing helps the Council to protect as many tenants living in private renting as possible.
- Through increased communication about licensing, tenants not only become more aware of their rights and responsibilities but also gain an improved understanding and greater access to Council services that can support them.

Benefits to landlords

- Licensing encourages landlords to proactively manage their properties and to take reasonable action to address problems.
- The Council will work with landlords to help support them and build their professionalism.
- Licensing enables the Council to create a ‘level playing field’ for responsible landlords by taking a much more robust approach to the minority of ‘rogue’ landlords who fail to invest in their properties.
- Providing transparent and consistent regulation within the PRS market to ensure rogue or non-compliant landlords cannot undercut responsible ones.

Benefits to the community

- Poorly managed privately rented properties have a negative impact on many neighbourhoods. Licensing will increase the number of landlords managing their properties effectively, including the enforcement of tenancy conditions to combat neighbourhood nuisance caused by their tenants or people visiting their properties.
- Reducing ASB will make areas safer, more desirable and healthier places to live.
- There is a connection between HMOs and poor waste management. All property licences contain a condition that the holder must provide adequately sized bins and sufficient recycling containers for the occupiers.
- When an HMO is overcrowded, this is often linked to an increase in noise complaints. Through licensing the Council is able to limit the number of occupants in a property, reducing overcrowding and the likelihood of noise nuisance.
- Licensing increases the Council's ability to uncover empty properties and encourage their use back into the housing market.

Benefits to the Council

- Licensing enables the Council to target support and information for both tenants and landlords more effectively.
- Licensing provides opportunity for easier engagement with landlords, managing agents, lettings agents, and others involved in the sector.
- Licensing creates improved data, enabling an intelligence led approach to enforcement.
- Licensing increases the Council's ability to uncover previously unknown HMOs, some of which will fall under mandatory licensing.

6 Property licensing schemes in Havering

6.1 Additional & selective licensing

In addition to the national mandatory HMO licensing scheme, Havering has implemented two additional licensing schemes. The first scheme was introduced on 1 March 2018 across 12 wards. This scheme expired on 28 February 2023. A second additional licensing scheme was introduced on 25 January 2021 and applied to the remaining wards not designated in scheme 1. This scheme expires on 24 January 2026.

Both scheme designations applied to all HMOs that do not fall within the scope of mandatory HMO licensing, including all properties shared by three or four people who are not related and share facilities. This includes flats within purpose-built blocks that were previously exempt from licensing under mandatory licensing and also section 257 HMOs.

In January 2021, Havering also introduced a selective licensing scheme which extended licensing to all private rented properties in the Council wards of Brooklands and Romford Town – as a result of the boundary review in 2021 these wards are now known as Rush Green & Crowlands, St Albans and St Edwards. This scheme expires at the same time as the HMO additional licensing scheme 2 – 24 January 2026.

Since the introduction of these licensing schemes, more than 4,076 licences have been granted.

Licence type	Licences granted
Mandatory	382
Additional	241
Selective	3453
Total	4076

Licensing schemes require landlords to proactively manage their properties and take action to address any problems in order to comply with licence conditions. They encourage better standards of property management. Havering has worked collaboratively with landlords to make sure these requirements are met and also carried out enforcement actions when needed to raise standards.

6.2 The impact of current licensing schemes

The administration and enforcement of the current licensing schemes has enabled the Council to make considerable progress in achieving its core licensing objectives.

Through robust, targeted enforcement, licensing has created a genuine and tangible deterrent for the minority of rogue landlords, to the benefit of their tenants and the wider community. Havering uses a range of statutory housing and public health notices to address poor housing standards in the PRS. Over a five-year period (2019-24) Havering served 535 housing and public health notices. Enforcement includes using the Housing Act and other public protection legislation to enforce standards and includes civil penalties and prosecutions. During this time, Havering issued 127 penalties and initiated eight prosecutions to address housing offences.

In particular, HMOs across the country are known to contain higher elements of risk, linked to key elements such as inadequate fire detection and protection. Fire risks are found to rise with increased occupancy, multiple ignition sources, vulnerable occupants, poor construction and lack of fire prevention measures. HMO licensing helps to ensure that properties are not overcrowded and are free of serious hazards, including fire safety.

Through the mandatory and discretionary licensing schemes, the Council has been able to improve basic standards, often in the most dangerous housing at the bottom end of the housing market, where some of the most vulnerable people in society live.

All licences have conditions attached which must be complied with, allowing the Council to regulate the PRS, improve housing conditions, and foster better management standards. In particular, we have been able to impose a level of ‘self-regulation’ in the PRS, as landlords will not be granted a licence unless they are able to demonstrate at the time of application that they are a ‘fit and proper’ person to be the licence holder and also that the property complies with fire, gas and electrical safety conditions.

The Council has seen a steady increase in the number of service requests made by private sector housing tenants reporting disrepair issues. There was a spike in the number of service requests in 2019/20, which fell slightly in 2020/21 during the pandemic but has steadily increased since 2021/22. This trend is detailed in the table below:

Financial year	Number of disrepair service requests received	Number of all Private Sector Housing Services requests
2019/20	174	1345
2020/21	251	780
2021/22	207	585
2022/23	196	596
2023/24	214	675

Disrepair service requests received by year

Case study 1: Unlicensed property brought into compliance

Background

The Private Sector Housing Team received a complaint from a tenant regarding significant disrepair in their rented property. The tenant described a persistent leak from the first-floor bathroom, causing water damage to the kitchen below, including damp, mould, and water seeping through the light fixture. Despite repeated attempts to inform the landlord and request repairs, no action was taken. Council officers' initial investigations revealed the property, located in a selective licensing area, was unlicensed, with no application submitted.



Hazards identified.

On inspection, the property was found to have several hazards identified under the Housing Health and Safety Rating System (HHSRS), including a category 1 hazard of damp and mould and category 2 hazards of electrical safety, structural collapse and falling elements, flames and hot surfaces, and food safety.



Council action

The Council served a Housing Act 2004 improvement notice and comprehensive schedule of works requiring the landlord to address the category 1 and 2 hazards. A licence application was pursued and the Council considered a range of additional enforcement actions in relation to the licensing non-compliance.

Outcome

The landlord complied with the notice which led to significant improvements in the property, bringing it up to the required standard. A selective licence application was also received.

The proposed selective licensing scheme would continue to ensure that action is taken against those landlords who choose to neglect their tenants and properties. We shall robustly enforce against any landlords who fail to obtain a licence, who deliberately fail to comply with licensing conditions, or whose properties present serious housing hazards.

6.3 Reduction in ASB

Poorly managed privately rented properties have a negative impact on many neighbourhoods. In particular, high levels of noise complaints and accumulations of rubbish can be linked to the failure of private landlords to manage their properties and tenancies effectively.

Through partnership working and sharing of intelligence, we continue to educate both landlords and tenants on their responsibilities in terms of waste disposal.

When a property is overcrowded, this is often linked to an increase in noise complaints. Through licensing, we have been able to limit the number of occupants in a property, reducing overcrowding and the likelihood of noise nuisance.

We have seen, through licensing, a notable increase in landlords managing their properties more effectively in order to ensure they do not breach licence conditions. This includes the enforcement of tenancy rules to prevent ASB by tenants or their visitors.

6.4 Working with and supporting good landlords and agents

We recognise that the majority of landlords in the borough are both responsible and cooperative. We have taken a more educational approach seeking to work with landlords and bring about compliance through informal means.

We have particularly encouraged landlords to become accredited to increase their professionalism in managing their properties. Through accreditation, landlords are able to achieve a level of knowledge and competence before letting a home, which is key to raising standards in the PRS. As of 2024, Havering had 1332 landlords accredited to the London Landlords Accreditation Scheme (LLAS).

Detailed guidance for landlords on their legal obligations and responsibilities has been produced and made available online.

Through the licensing schemes, a database of more than 3,208 landlords and agents operating in Havering has been compiled, supporting better communication and engagement with the sector.

6.5 Supporting PRS tenants

In promoting tenants' rights and responsibilities, tenants' awareness of the minimum standards to be expected in rented accommodation can dramatically be increased. Tenants have been encouraged to report landlords who have not licensed their properties or who do not comply with licensing conditions. Between 2019 and 2024, the Council has received approximately 1,459 complaints/service requests linked to 1,208 properties from tenants in the PRS, resulting in significant interventions and property improvements.[6]

It is clear from running the discretionary licensing schemes that licensing allows the Council to work proactively with landlords and tenants. Licensing provides clear conditions for landlords to comply with, promotes an improvement in property conditions and enables ASB to be minimalised through better, more effective management. Licence conditions can be enforced against much more effectively and quickly than using other powers available to the Council, such as Part 1 of the Housing Act (2004). Formal action under Part 1 is generally a slow process, with appeals allowed for most types of notices, which can significantly delay the time period for compliance. Whilst the mandatory HMO and discretionary licence schemes has enabled the Council to begin to make some progress in raising standards in the PRS, there is still much more to do.

6.6 Working in partnership to improve the PRS

The current licensing schemes have been a key tool used alongside other initiatives and partnerships to tackle issues affecting the PRS. We have engaged in several joint working initiatives and partnerships with agencies such as the police, the London Fire Brigade, Justice for Tenants, Safer Renting, and the Citizens Advice Bureau. We will continue to work with these and other stakeholders to ensure the safety and well-being of tenants, improve housing standards, and address any emerging challenges within the PRS.

[6] Housing Stock and Stressors Report, Metastreet, 2024

Case study 2: Collaborating with partners to protect the safety and wellbeing of tenants in the PRS

Background

A healthcare professional, following a visit to a tenant, raised concerns about significant disrepair in the tenant's private rented property. The tenant was reluctant to pursue the matter himself due to fears of eviction. Back-office checks confirmed that the property was licensed. Council officers were able to make immediate contact with the licence holder to arrange an inspection of the property.



Hazards identified

On inspection, the property was found to have serious disrepair including a leak from the bathroom to the kitchen, security concerns with the ground-floor windows and rear doors, a trip hazard in the kitchen, a slug infestation, a faulty electrical socket, and potential structural problems with the flank wall.



Council action

A post-inspection letter was sent to the landlord, setting out the issues within the property. The landlord responded promptly, indicating their commitment to addressing the concerns. Remedial works were initiated immediately to rectify the disrepair and ensure the property met all necessary safety standards.



Outcome

Remedial works were completed within the specified timelines. The tenant now has the benefit of replacement windows throughout, a new rear door, new fitted kitchen. The flank wall issue was highlighted on a structural engineers report to be not significant but works recommended were complied with.

Licensing enables the Council to work with, advise and support landlords to address poor housing conditions and achieve compliance with licence conditions. Additionally, licensing plays a crucial role in educating tenants about their rights and how to deal with issues that arise in their properties. We will continue to collaborate with partners to help protect the safety and wellbeing of tenants in the PRS

7 Proposal for selective licensing

The PRS in Havering is affected by various housing issues which are worsened by other issues such as ASB, poverty, high rents, fuel poverty and homelessness.

The Council has been truly selective in proposing the areas for this licensing scheme. Thorough evidence gathering and research has been carefully carried out to ensure that the most severe problems in each ward can be dealt with. All properties in the designated areas that are rented to a single household (e.g., a family) or two unrelated sharers (e.g., two friends living together) would need to have a licence to be legally let.

Based on this evidence, it is proposed, subject to consultation, that the Council introduces a selective licensing scheme covering the seven wards in which there is a high percentage of PRS and high levels of poor housing conditions. The seven wards are:

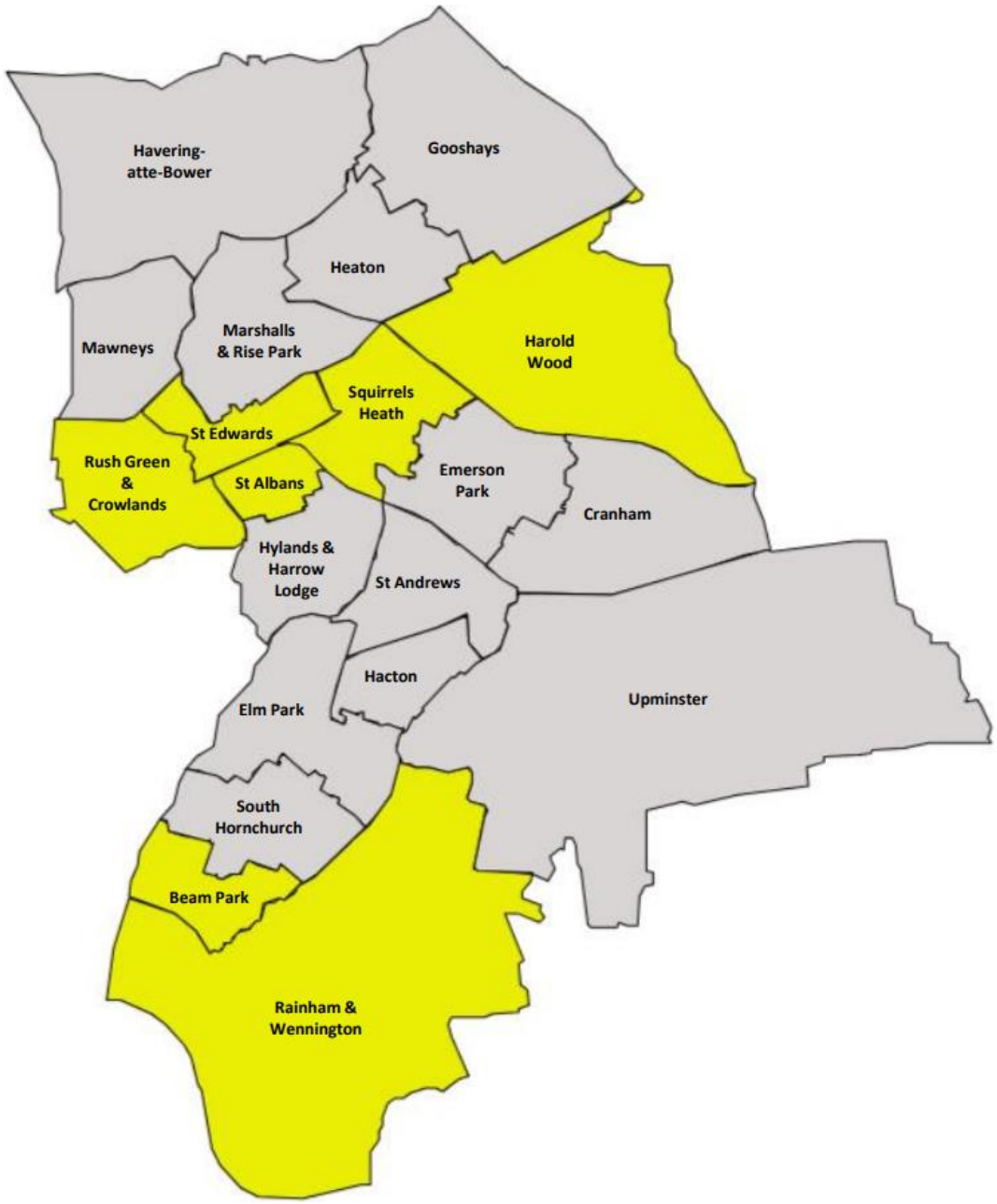
- Beam Park
- Harold Wood
- Rainham & Wennington
- Rush Green & Crowlands
- Squirrels Heath
- St Albans
- St Edwards

The total size of the selective licensing designation would affect 34.5% of the geographical area of Havering and 49.7% of its privately rented housing. Until late 2024, this meant the Council was required to seek approval from the Ministry of Housing, Communities and Local Government (MHCLG); councils may now approve the introduction of selective licensing schemes of any size, locally through the Council Cabinet, though they still must satisfy all legal requirements in regards to evidencing the need for a scheme, thoroughness of public consultation and proof that, if introduced, a scheme is being properly administered.

Subject to consideration of the responses in the consultation process, the Council is keen to address the serious problems of poor housing conditions in these seven wards as soon as reasonably practicable and could implement this scheme in early 2026. The designation is subject to change as a result of this consultation and the Council welcomes input into the scheme.

7.1 Map of the proposed selective licensing designation

Map of the proposed selective licensing scheme:



7.2 Designation criteria: poor housing conditions

7.2.1 What is the evidence of poor housing conditions in this designation?

Our evidence shows that in the seven wards within this designation, the proportion of PRS properties (excluding HMOs) with at least one serious hazard (Category 1 and high scoring Category 2,HHSRS) is predicted to be higher than the national average of 10%.[7]

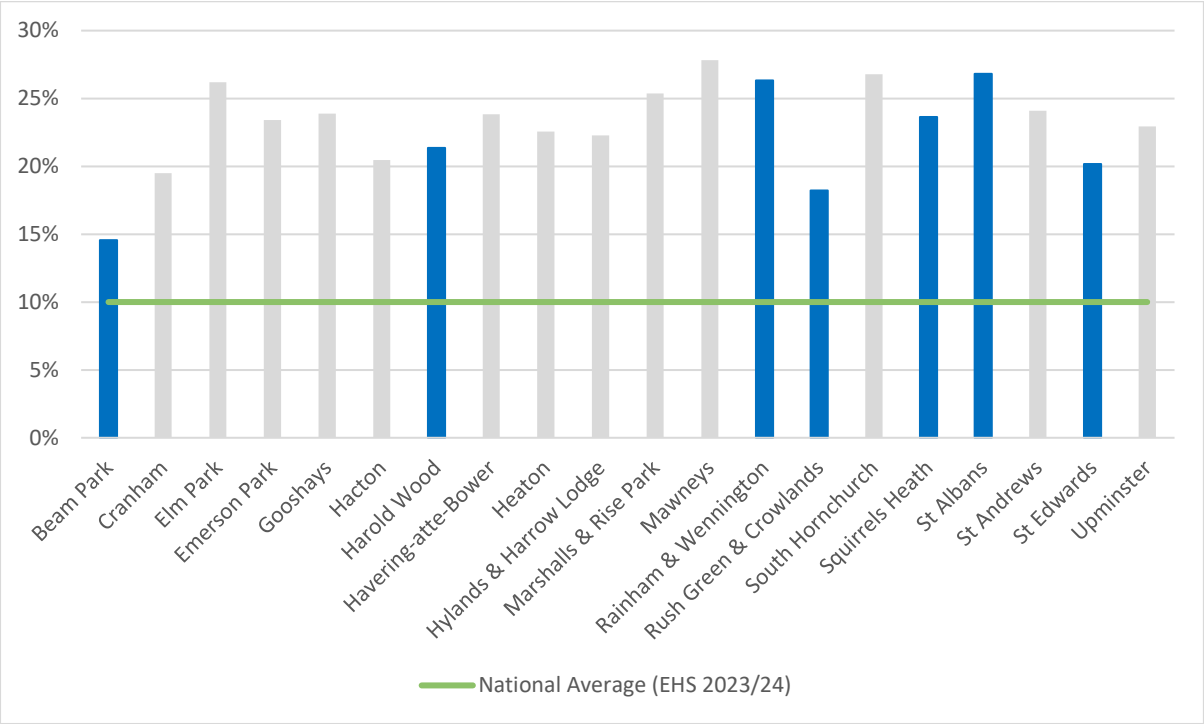
The designated wards in Havering are as follows:

- Beam Park (14.6%)
- Harold Wood (21.4%)
- Rainham & Wennington (26.3%)
- Rush Green & Crowlands (18.2%)
- Squirrels Heath (23.6%)
- St Albans (26.8%)
- St Edwards (20.2%).

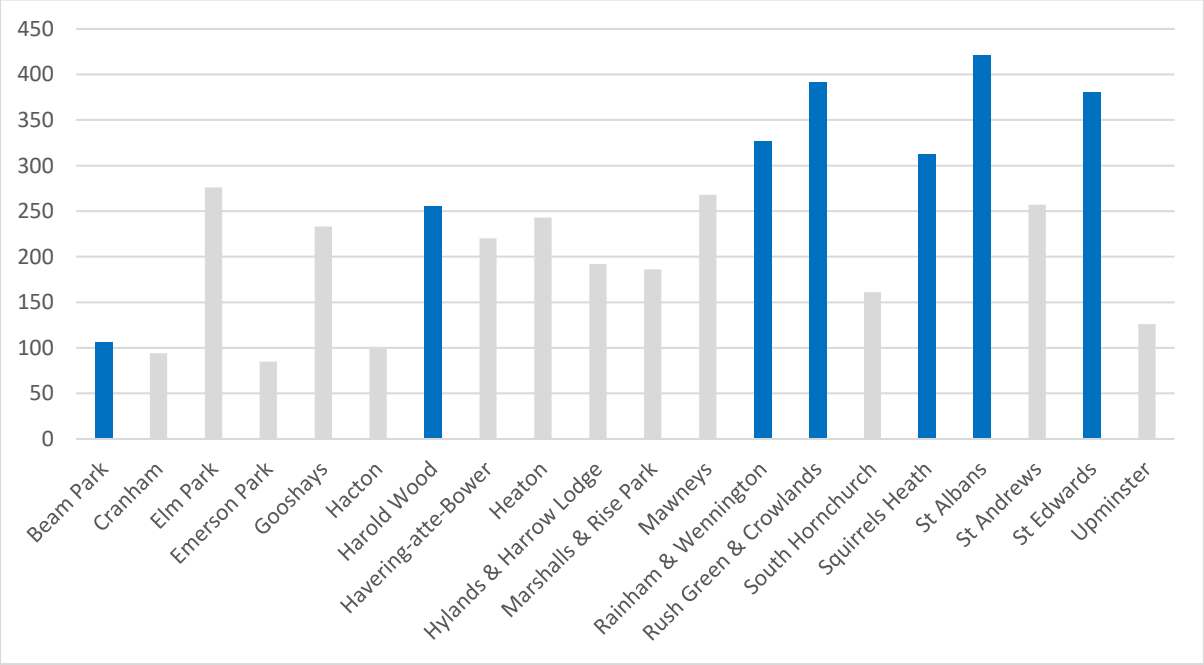
Overall, in these seven wards, 2,192 PRS properties (excluding HMOs) are predicted to have at least one serious hazard.[8]

It is also highly likely that these properties will also have at least one category 2 hazard. A significant number of these properties would need to be inspected to accurately identify and assess the presence of category 1 or 2 hazards.

[7] English Housing Survey 2023 to 2024: headline findings on demographics and household resilience. - GOV.UK
[8] Housing Stock and Stressors Report, Metastreet, 2024

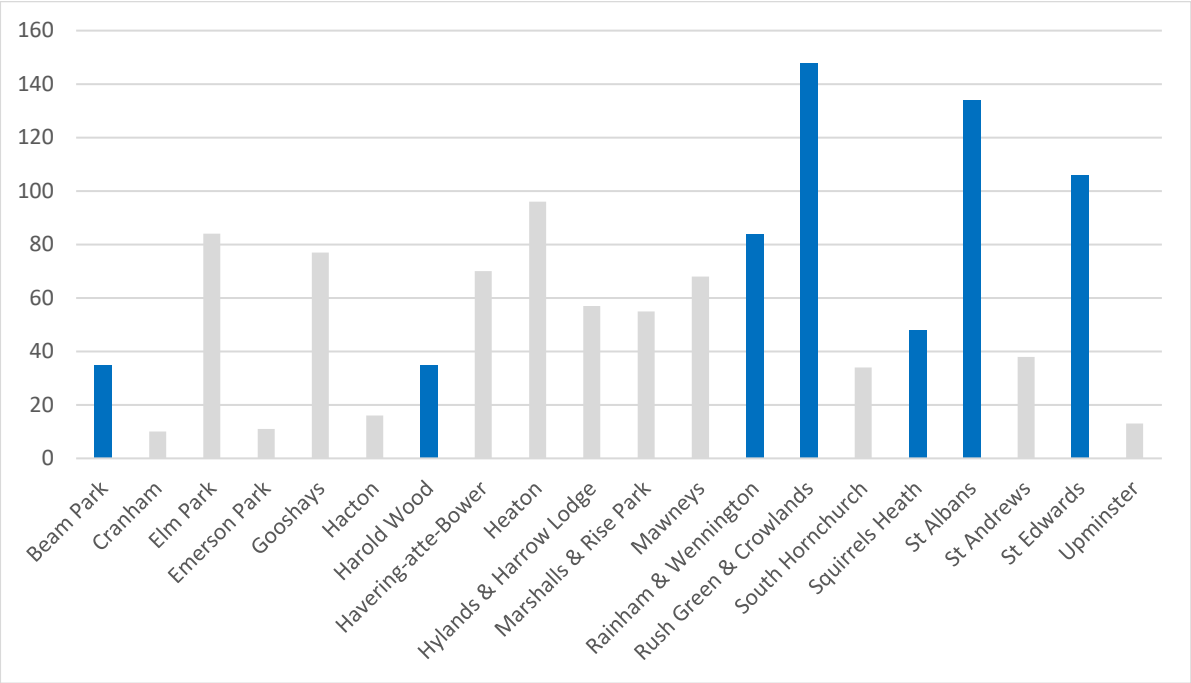


Predicted percentage of PRS properties (Excl. HMOs) with at least one serious hazard by ward (HSCR 2024)



Predicted number of PRS properties (Excl. HMOs) with at least one serious hazard by ward (HSCR 2024)

Complaints made by PRS tenants and others to the Council about poor housing conditions and inadequate property management are a direct indicator of the poor quality within the PRS. Havering received 1,219 complaints from PRS tenants (excluding HMO tenants) in these seven wards over the period 2021-2024. Rush Green & Crowlands (148) and St Albans (134) had the highest levels of complaints.



Complaints linked to PRS properties (Excl. HMOs) by ward (HSCR 2024)

7.3 Other factors impacting poor housing conditions

7.3.1 Damp and mould

Damp and mould is one of 29 hazards assessed under the HHSRS. The HHSRS is a tool used to assess risks in residential properties. Hazards assessed at the most dangerous level using issued Government guidance are classified as ‘category 1’. All other assessable hazards that are judged to be significantly worse than average are ‘category 2’ hazards. Local authorities have a duty under the Act to take enforcement action on category 1 hazards and a power to take enforcement action on category 2 hazards.

Damp and mould primarily affect the airways and lungs, but they can also affect the eyes and skin. The respiratory effects of damp and mould can cause serious illness and, in the most severe cases, death. The presence of damp and mould can also affect tenants’ mental health. This could be due to worries about the health impacts of damp and mould, unpleasant living conditions and destruction of property and belongings, among other concerns.

Everyone is vulnerable to the health impacts of damp and mould, but people with certain health conditions, children and older adults are at greater risk of more severe health impacts. In 2022, the media reported widely on poor conditions caused by damp and mould in social and private rented housing. This was primarily prompted by highlighting the tragic case of two-year-old Awaab Ishak who died in 2020 due to prolonged exposure to mould in his home.

Certain groups are more likely than others to live in homes with damp and mould[9]. This includes:

- people with a long-term illness
- people who struggle to heat their homes and/or are experiencing fuel poverty
- people on low incomes
- people with disabilities
- people from ethnic minority backgrounds
- people living in temporary accommodation.

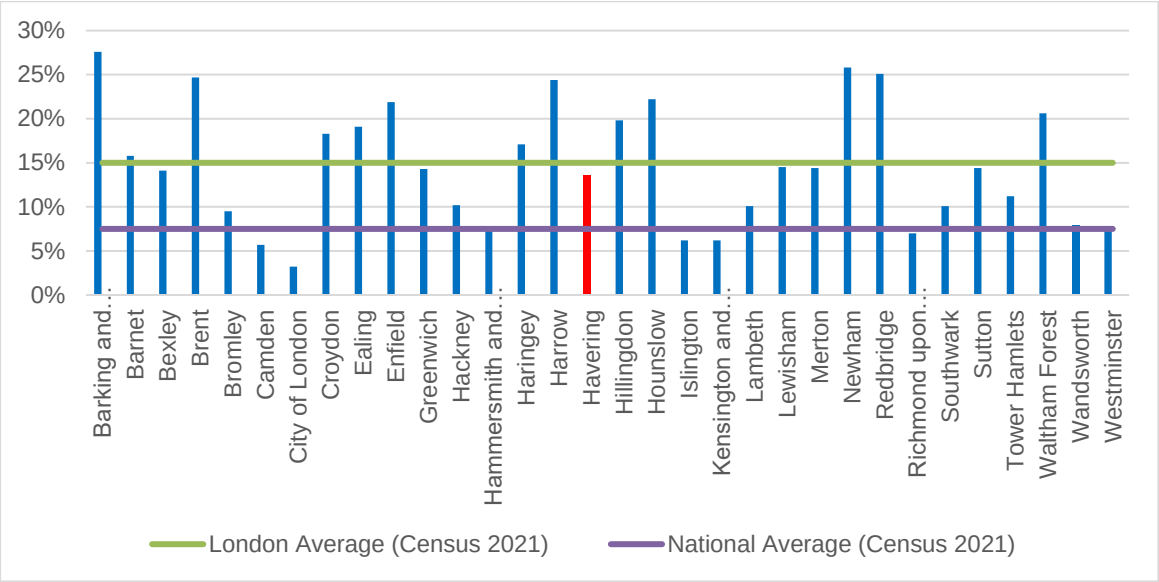
7.3.2 Overcrowding

Overcrowding is a secondary impact of housing unaffordability. A household is classified as overcrowded if it has fewer bedrooms than it needs to avoid undesirable sharing, based on the age, sex and relationship of household members. 13.6% of privately rented households within Havering are overcrowded. This is slightly lower than the London average of 15%[10].

Overcrowding exacerbates hazards such as damp and mould due to the increased laundry and cooking activities required to cater to more people in a confined space. Insulation and ventilation cannot generally cope with the extra demand. The HHSRS states that 'crowded conditions can result in a moisture burden above that which the dwelling is designed to safely deal with, and this can be a cause of condensation and high humidities, giving rise to associated health risk'[11].

Evidence indicates that poor housing conditions and overcrowding negatively affect physical and mental health and can also have a major impact on educational achievement. For example, children's education may be affected by overcrowding directly, through a lack of space for homework, as well as indirectly because of school absences caused by illness[12].

[9] Understanding and addressing the health risks of damp and mould in the home _ GOV.UK (www.gov.uk)
[10] Census 2021
[11] HHSRS Guidance
[12] The impact of bad housing on children's lives (Shelter)



Percentage of overcrowded PRS properties by London borough (Census 2021)

7.3.3 Fuel poverty

Whilst energy prices in the UK are no longer near the extreme highs seen in late 2022 and early 2023, energy prices still remain high and unaffordable for many. With growing pressure on household finances because of increasing energy costs and wider concerns about the cost of living, there are reports that households are choosing between “heating or eating” over the winter months.

7.3.4 Minimum Energy Efficiency Standard (MEES)

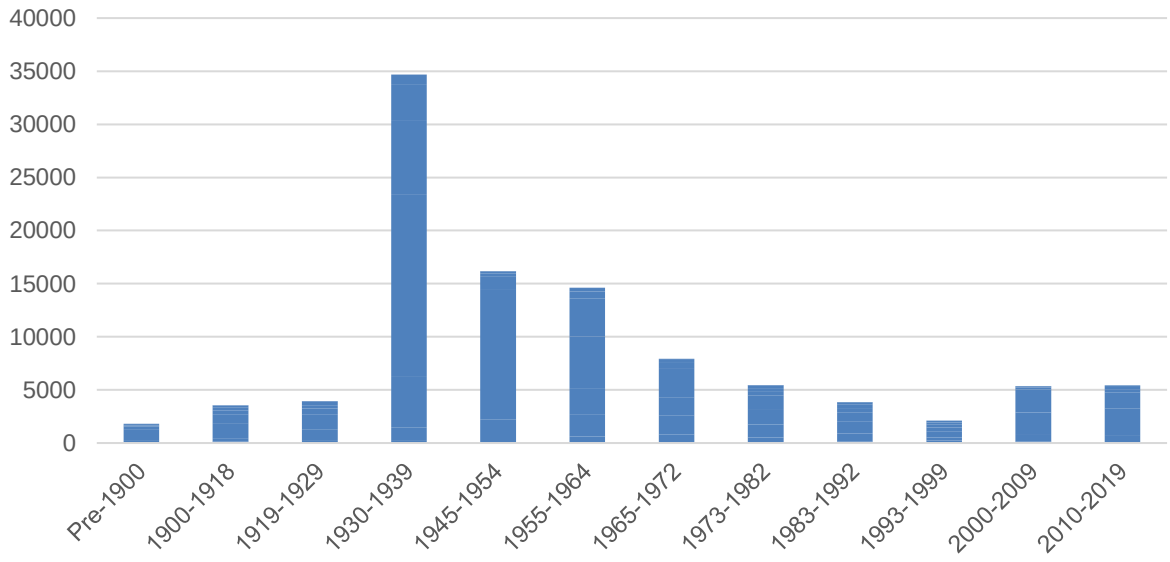
An EPC rating is an assessment of a property’s energy efficiency. It is primarily used by buyers or renters of residential properties to assess the energy costs associated with heating a house or flat. The rating is from A to G. A indicates a highly efficient property; G indicates low efficiency.

The Minimum Energy Efficiency Standard (MEES) came into force in England and Wales on 1 April 2018. The regulation applies to PRS properties and mandates that all dwellings must have an EPC rating of A-E to be compliant. Currently in Havering 13.9% of PRS properties have an E to G rating with 1.2% having an F and G rating which means that 252 PRS properties are likely to fail the MEES statutory requirement[13].The statistical evidence shows that there is a continuous relationship between indoor temperature and vulnerability to cold-related deaths[14]. The colder the dwelling, the greater the risk. The percentage rise in deaths in winter is greater in

[13] Housing Stock Condition and Stressors Report (Metastreet 2024)
[14] Housing Health and Safety Rating System

dwellings with low energy efficiency ratings. Therefore, the F and G properties present a serious risk to the occupants' health, particularly if over the age of 65.

It is notable that there is a gradient of risk with age of the property, the risk being greatest in dwellings built before 1850, and lowest in the more energy efficient dwellings built after 1980. Havering has a significant number of residential properties (41.9%) built pre-Second World War. Wards with many older properties tend to have more hazards such as excess cold, fire & electrical issues, damp and mould[15]



All housing stock age profile (Source: VOA 2019).

[15] Dwellings by Property Build Period and Type (VOA 2015)

8 Proposals for an additional HMO licensing scheme

The evidence base demonstrates that the criteria for a borough-wide additional licensing scheme is met in that a significant proportion of the borough's HMOs are being poorly managed and are giving rise, or are likely to give rise, to problems affecting their occupiers or members of the public.

Whilst we have made good progress with our mandatory and current additional HMO schemes, there is more to be done as our evidence shows that a significant proportion of HMOs in the borough are being managed ineffectively, proven by the cumulative presence of serious housings hazards.

We are therefore proposing to implement an additional HMO licensing scheme that will apply to all wards in the borough. Subject to consultation and approval, the scheme will come into force in 2026 and last for a period up to five years.

An additional HMO licence will be required for properties that are HMOs rented to three or four occupiers in two or more households that share (or lack) toilet, washing and cooking facilities. This excludes HMOs that require a mandatory HMO licence. Multiple-occupied flats in purpose-built blocks (with over two flats) where more than three people live in the flat are included.

The proposed additional HMO scheme will also apply to converted building HMOs, known as section 257 HMOs. These are properties that

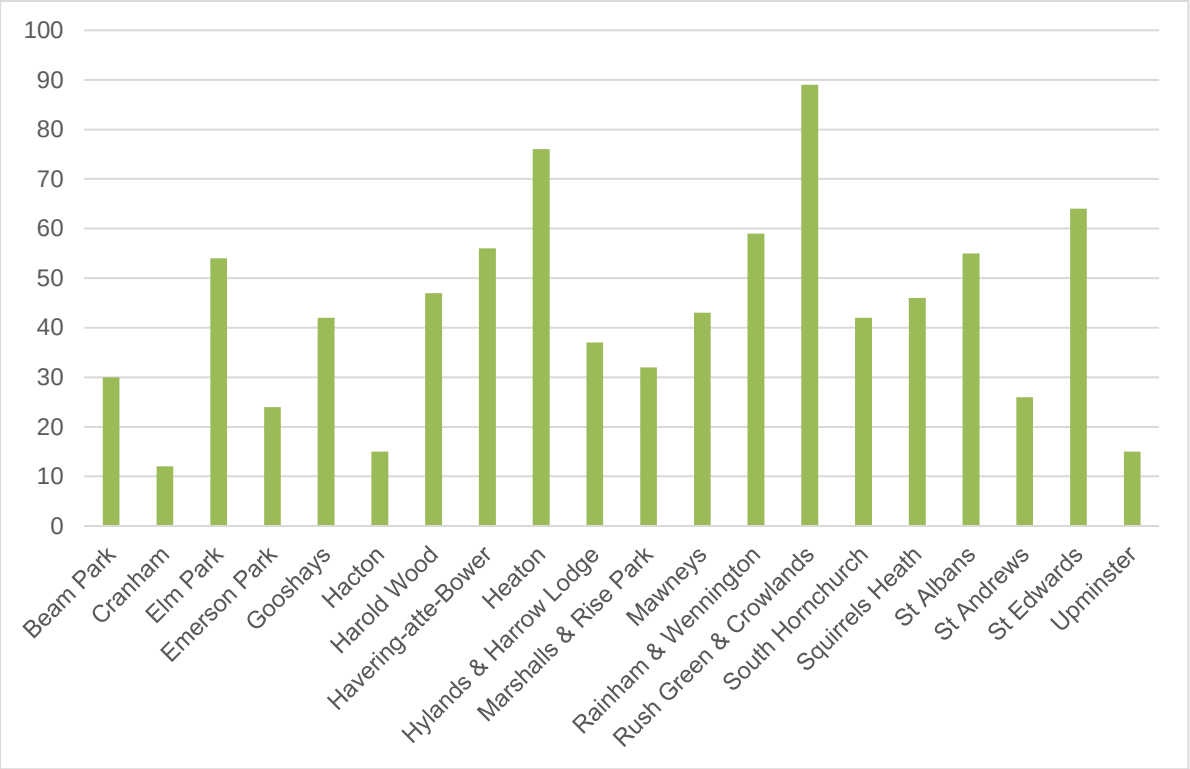
- have been converted into self-contained flats
- the conversion did not comply with the relevant Building Regulations in force at that time and still does not comply; and
- less than two thirds of the flats are owner occupied.

There are some types of buildings which are exempt from HMO licensing by law. These include buildings controlled by public sector bodies (for example, housing associations), some buildings occupied by students, and some owner-occupied buildings. A full list of exemptions can be found at Housing Act 2004 (legislation.gov.uk)

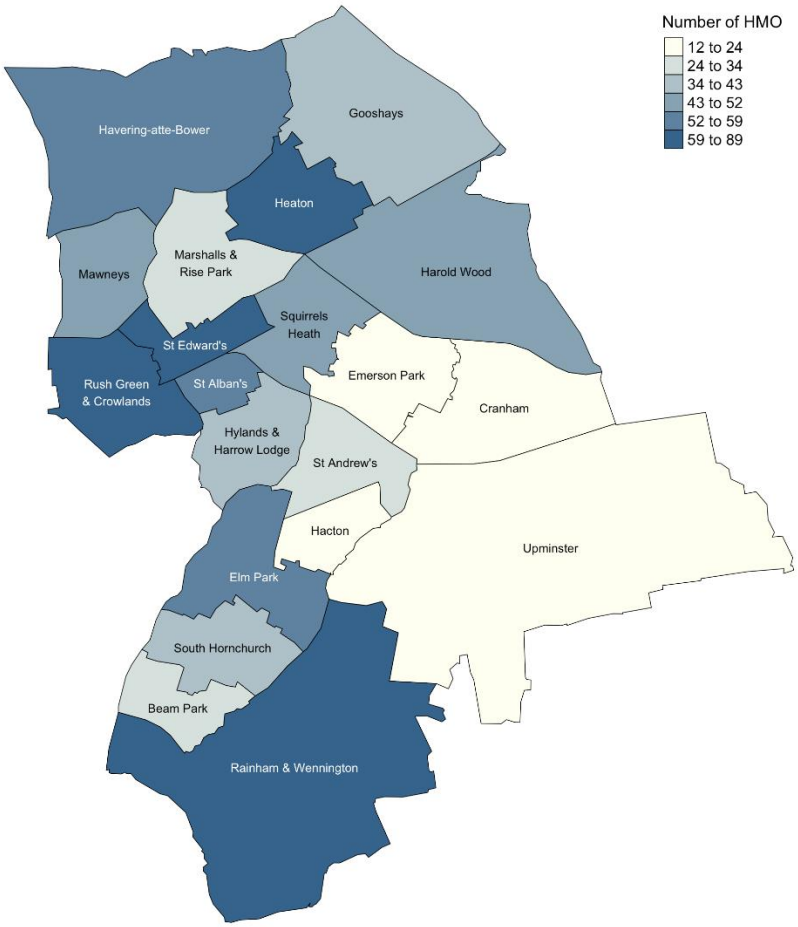
8.1 What is the evidence to support the Council's proposals to implement an additional HMO scheme?

8.1.1 Numbers and type of HMO as a subset of the private rented sector

Havering has 864 HMOs (known and predicted) distributed across all 20 wards.



Number of HMOs by ward (HSCR 2024)

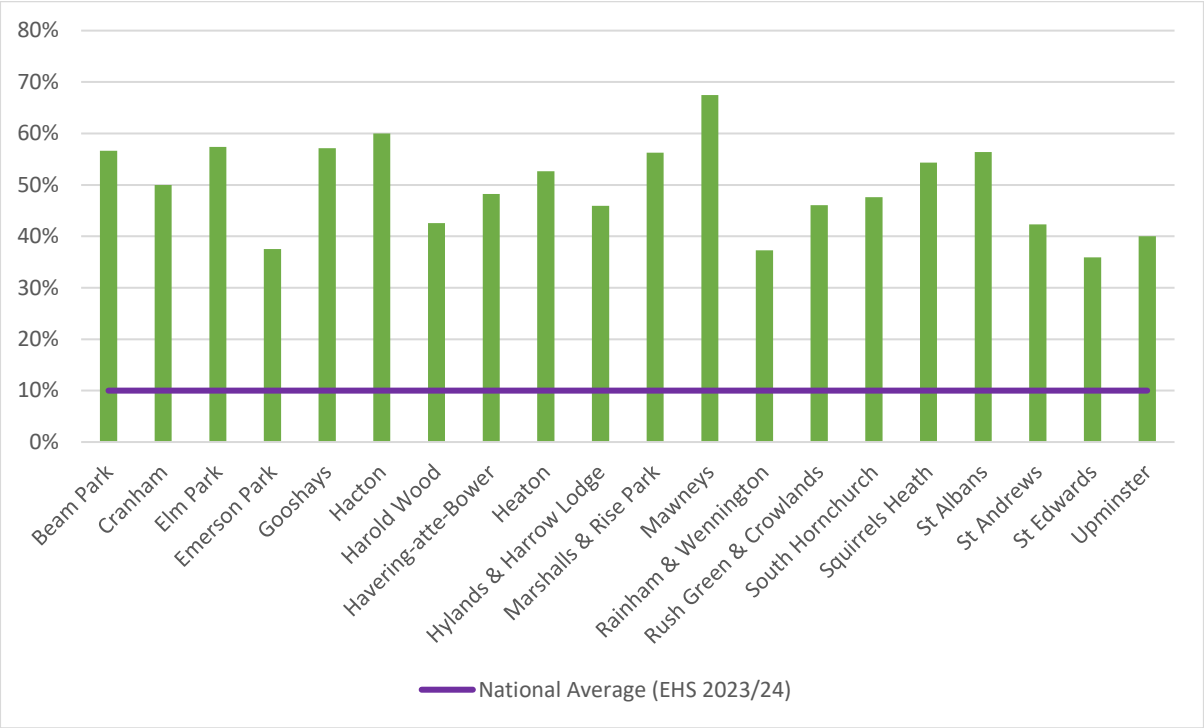


Map of distribution of HMOs by ward (HSCR 2024)

8.1.2 HMOs & housing conditions

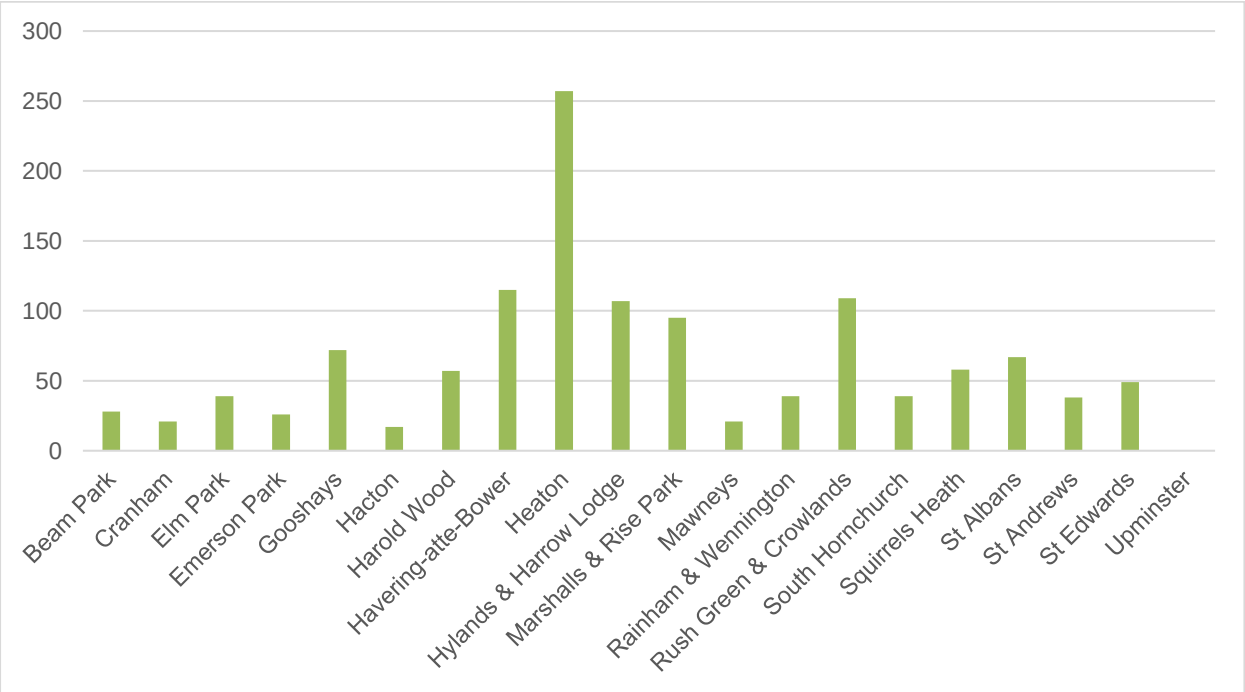
Poor housing conditions are prevalent in Havering's HMOs. The evidence shows that 426 HMOs in Havering are predicted to have serious hazards (Category 1 and high-scoring Category 2). This represents nearly 50% of all HMOs in Havering and is more than quadruple the national average of 10%.[16]

[16] English Housing Survey 2023 to 2024: headline findings on demographics and household resilience. - GOV.UK



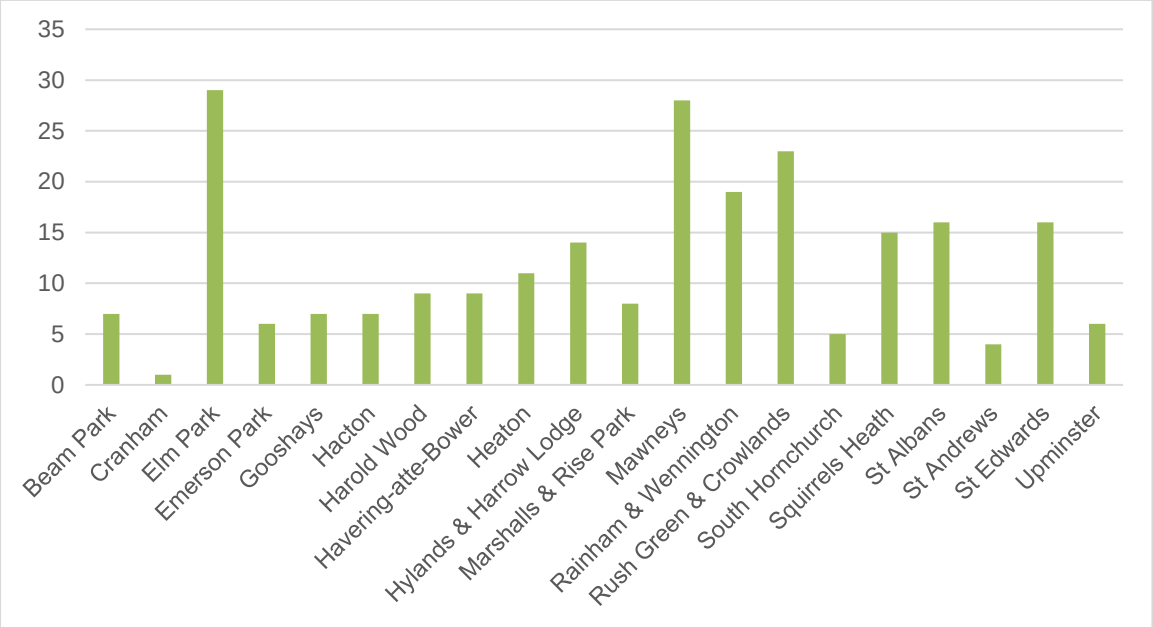
Predicted percentage of HMOs with serious hazards by ward (HSCR 2024)

Between 2021-2024 Council officers identified 1254 hazards (Category 1 & 2, HHSRS) during inspections of known HMOs. Therefore 43% of HMOs inspected were found to have at least 1 hazard (Category 1 & 2, HHSRS). Council officers identified the most hazards in HMOs in Heaton (257) and Havering-atte-Bower (115).



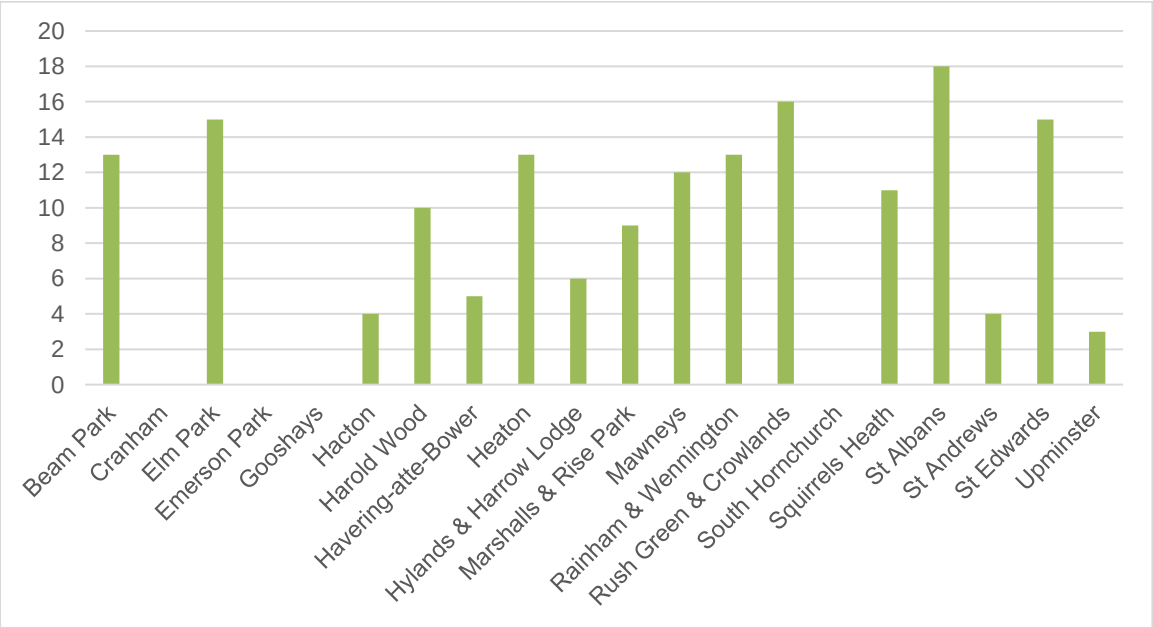
All hazards identified through inspections by ward (HSCR 2024)

Complaints made by tenants and others to Havering Council about poor housing conditions and inadequate property management are a direct indicator of low quality and poorly managed HMOs. Between 2021- 2024, Havering received 240 complaints linked to HMOs distributed across all wards with Elm Park (29) and Mawneys (28) having the highest levels.



Complaints linked to HMOs by ward (HSCR 2024)

Responding to complaints in HMOs has required a significant number of Council interventions, representing a drain on Council resources. Between 2019-2024, the Council has issued HMOs with 167 housing and statutory housing and public health notices. St Albans (18) and Rush Green & Crowlands (16) required the most statutory notices on HMOs.



HMO statutory housing and public health notices served by ward (HSCR 2024)

9 Addressing poor conditions and management standards through licensing

The selective and additional HMO licensing designations would allow the Council to bring about a significant improvement to housing conditions and property management in the area during the life of the schemes, reducing incidences of serious housing hazards and ASB within the borough.

As demonstrated, our evidence shows that a high proportion of PRS properties in the proposed selective licensing designation area are predicted to have unacceptably high levels of category 1 and 2 hazards. The Council believes it is necessary to inspect a large number of these properties to accurately identify the type and severity of category 1 or 2 hazards present. If any hazards are found, the Council will take the required enforcement actions to rectify them.

Our evidence also shows that a high proportion of additional HMOs in the borough are being managed ineffectively, proven by the cumulative presence of serious housing hazards and complaints about poor housing conditions and inadequate property management.

Through these licensing regimes and the granting of licences, standard licence conditions would be imposed that require licence holders to manage their properties proactively and to take reasonable action to address any identified problems.

We will ensure that properties identified as ‘high risk’ are prioritised for inspection by officers to check for hazards and compliance with the licence conditions. This will allow the Council to take enforcement action (under Part 1 of the Housing Act), where necessary, to improve conditions.

The licensing inspection regime will also enable us to identify tenants on low incomes who are living in homes with an E, F or G EPC rating and those who may be affected by fuel poverty. Tenants will be referred to the appropriate services to ensure they receive the available support, and landlords will be advised accordingly. For those whose properties fall below the legal requirement and who ignore the advice and support of the Council, the Private Sector Housing team will work with Trading Standards (currently responsible for enforcement of The Domestic Minimum Energy Efficiency Standard (MEES) Regulations) to bring them into compliance.

Licensing also gives the Council further powers to reduce ASB in the PRS. Without licensing the Council are only able to take action against tenants for ASB, as

opposed to licensing, which places a duty on landlords to manage ASB in their properties as well. Landlords will receive guidance and advice on managing tenants involved in ASB, particularly in cases of serious ASB requiring formal court action.

The Council will expect property management issues identified during an inspection to be resolved within a reasonable period, depending on the severity of the issue, improvement notices, overcrowding notices and prohibition orders are formal notices that may be issued to bring about improvements in properties. Landlords who fail to license their properties could also receive a civil penalty or may be prosecuted.

We will also continue to collaborate with the local police, the London Fire Brigade, UK Border Agency and other Council departments to identify properties that need improvement.

The Council will proactively work with landlords to address poor housing conditions and poor property management and help them to comply with the licence conditions in the borough. We will provide information and guidance on managing properties via the Council's web site and through forums (either in person or online).

We will use licensing to empower tenants by educating them on the standards that they should expect from their rented accommodation, their rights and how to access Council services that can support them if needed.

10 Proposed licensing scheme conditions

The conditions that the Council proposes to include in licences granted under the selective and additional licensing schemes can be seen in **Appendix 2** and **Appendix 3** and the documents downloadable from the consultation web page.

Each set of proposed licence conditions includes, for ease of reference, both mandatory conditions that the Council is obliged to include under statute, and discretionary conditions that we propose to include in licences granted in Havering.

As part of the consultation process, respondents are able to give us their views about the proposed discretionary conditions for the selective and additional licensing schemes.

Please note, the proposed licence conditions for both schemes represent the conditions that the Council would normally impose in respect of a licence granted on application for a selective or additional licence. However, the Council may impose alternative (bespoke) conditions, where necessary and appropriate, on an individual case basis.

11 Proposed licensing scheme fees

11.1 Fee proposal

Licence applicants will be required to pay a fee for each property that needs a licence. The proposed selective licence fee is £950 per property and the proposed additional licence fee is £1400 per property. We are also proposing a number of discounts outlined below.

Further information is available in the proposed schedule of fees, charges and discounts, attached as **Appendix 4.** These fees form part of the consultation, and the Council welcomes any views on them.

11.2 Fee split

By law, the fee must be levied in two parts.

Part A will be payable on submission of the application and will cover the cost of processing and the administration in determining the eligibility of the application. Should the application be refused or rejected by the council or withdrawn by the applicant this first Part A payment will not be refunded.

Part B will be payable once the application has been assessed, and the decision is made to grant the licence. This will cover the administration, management, and enforcement of the licensing functions for the scheme.

In the event that we decide to refuse a licence application, only the Part A fee will be payable.

11.3 Fee amounts

Type of licence	Part A fee	Part B fee	Total fee
Selective	£570	£380	£950
Additional HMO	£840	£560	£1400

11.4 Fee discounts

Nature of discount	Amount (Selective)	Amount (Additional)
Multi-dwelling	£100 off Part A	£100 off Part A
EPC rating C and above	£75 off Part B	£75 off Part B
Accredited landlord	£100 off Part B	£100 off Part B

11.5 How we calculated the fees

The proposed fees have been calculated on the basis that the schemes will be cost-neutral to the Council and will not generate a profit. Licence fees cover our costs of administering the schemes and meeting the scheme objectives that are set out below. A significant proportion of the licence fee income will meet the necessary staffing costs to deliver the scheme outcomes, but the fees will also meet other running costs, such as IT expenditure, with appropriate allowances made for inflationary increases during the life of the scheme.

The proposed fees are underpinned by assumptions about the level of income the fees will generate, based upon the number of properties that we expect to be licensed during the life of the schemes and the numbers of those properties that we expect to be eligible to discounts.

12 Selective and additional licensing exemptions

Selective licensing applies to all privately rented properties within the designations unless they are licensable HMOs or exempt by law. Such exemptions include tenancies granted by public bodies (for example housing associations), holiday homes and some business tenancies. A full list of exemptions for selective and additional licensing can be found at The Selective Licensing of Houses (Specified Exemptions) (England) Order 2006 (legislation.gov.uk)

Schedule 14 of the Housing Act provides an exemption from HMO licensing law for some types of buildings. These include buildings controlled by public sector bodies (for example, housing associations), some buildings occupied by students, and some owner-occupied buildings. A full list of exemptions can be found at Housing Act 2004 (https://shorturl.at/v8hfa)

13 Alternatives to licensing

We have considered other courses of action, or alternatives to the licensing proposals. But we do not believe that they provide as effective means of tackling poor housing conditions and poor property management.

Alternative Measure	Strengths	Weaknesses
Use of Part 1 Housing Act 2004 enforcement powers [HHSRS] and Public Health powers	Following an investigation, formal statutory notices can be served that require improvements to be carried out to a property. Councils can carry out work in default if a notice is not complied with. Landlords risk being prosecuted if they do not comply with the notice, or the Council can impose a civil penalty on the person responsible.	The powers do not place any obligation on landlords to be proactive in improving conditions. Formal action is generally slow, with appeal provisions against most types of notices served, which can significantly delay the time period for compliance. Work in default can be effective, but it is expensive and time-consuming to the Council, with the risk that not all costs are recovered. Successful prosecutions and civil penalties do not in themselves secure improvements in property conditions and the Council's costs in pursuing legal action are often not met in full.
Rely on prosecutions and civil penalties for housing offences	Provides landlords with a disincentive to keep properties in poor conditions.	These powers do not place any obligation on landlords to be proactive in improving conditions. Successful prosecutions, or the imposition of civil penalties, do not in themselves secure improvements in property conditions. The absence of licensing significantly reduces the scope of the Council to impose civil penalties in respect of identified housing breaches.
Wider promotion of voluntary accreditation	For those landlords who take part, accreditation can	This requires voluntary landlord engagement, and rogue operators are unlikely to attend/engage in

schemes to facilitate improvement in management practices and standards	increase their knowledge and competence and their ability to effectively manage a property.	such schemes.
Improvement grants to improve sub-standard properties	Grants subsidise improvement works, improving standards and giving benefits for landlords and tenants.	Generally, there are few grants available, and the Council has very limited scope to offer grants through successful external funding bids. In the most part, grant awards would fund improvements that the landlord should be carrying out to meet their legal obligations. Any grant scheme would be discretionary and would rely on voluntary landlord engagement.
ASB powers	Formal notices can be served at addresses identified as having ASB issues. This can resolve ASB at the particular address.	Action would generally be taken against the tenant in occupation. The powers do not place any obligations on landlords to be proactive in managing their properties to prevent or reduce the likelihood of ASB occurring.
Renters Rights Bill (Introduced to Parliament September 2024)	Will give the Council greater enforcement and investigatory powers.	Does not put in place a proactive approach to housing standards and still relies on tenants complaining and landlords being upfront about issues.

14 Proposed scheme objectives

Licensing is part of a broader, coordinated approach to help improve privately rented properties in Havering. In general terms, we propose to use selective and additional licensing to continue to improve property conditions within the borough and keep our residents safe. We are committed to improving property conditions and management standards in the PRS, so that it contains good quality accommodation, helps us to achieve sustainable communities and continues to contribute positively to the local economy.

The objectives of our proposed schemes are outlined below:

	Objective	Outcome
1.	**Improve housing conditions in the PRS by eliminating poor property standards**	• Licensed properties are monitored, and licence conditions robustly enforced and complied with • Poor Housing Conditions are improved with category 1 & 2 hazards resolved (including issues such as damp and mould) • Improved health, safety and welfare of tenants in the PRS • The Council will gain increased knowledge of the private rented sector in the borough. This will enable targeted enforcement and support for landlords
2.	**Improve management standards in PRS properties**	• Landlords actively manage their properties or be enforced against • Absentee or unfit landlords employ an agent to actively manage their properties to ensure compliance • Prevention of overcrowding through better management of property occupancy • Greater number of landlords become accredited improving the professionalism of landlords in the PRS • Engagement with landlords improved • Landlords are kept informed of latest legislation and good practice • Responsible landlords will become more involved in Council licensing schemes and receive information and support • Irresponsible landlords will be forced to improve their properties or be enforced against

3.	**Increased awareness for tenants of the minimum standards to be expected in rented accommodation and what their other rights are when renting in the PRS**	• Information for tenants on the local licensing scheme advertised and third-party support for tenants made available • Dedicated tenants' advice section created on web site • Officers to provide tenants with information and sign posting to support their housing and wider needs • Improved tenants' support through work with third parties. • Renters know their rights and responsibilities and have greater awareness of and access to Council services that can support them • Tenants will see economic benefits such as reduced heating costs, bringing them out of fuel poverty

15 Licensing and wider Council strategies

Property licensing is an effective tool in improving conditions for private renters and forms an integral part of the Council's overarching housing strategy. In addition, licensing can support the delivery of several broader Council priorities that recognise the impact of poor-quality housing and ASB in residents' lives.

15.1 Havering Corporate Plan

Havering Council's Corporate Plan 2024-2027 focuses on three priorities:

- **People** - Supporting our residents to stay safe and well: Aims to enhance health, support youth, and protect vulnerable groups by promoting preventive healthcare, mental health support, and improved care for at-risk children.

- **Place** - A great place to live, work and enjoy: Seeks to improve public safety, provide affordable housing, and maintain public spaces, focusing on safety initiatives and environmental sustainability.

- **Resources** - Enabling a resident-focused and resilient Council: Emphasises digital transformation, better data use, and efficient resource management, including updating systems and enhancing service transparency.

A selective licensing scheme will contribute to the Council's priorities and assist in achieving its key ambitions and deliver better standards for private renters. Licensing schemes promote healthier, safer neighbourhoods, sustainability through energy efficiency standards, and equality by ensuring safe, healthy living conditions for all residents regardless of tenure.

15.2 Havering Housing Strategy

The Council is currently developing a new Housing Strategy for 2025 onwards. The draft strategy recognises there are many housing challenges facing Havering and seeks to address these challenges in the following way:

- Set out a plan to meet the diverse and evolving housing requirements of Havering informed by the latest data and projections.
- Focus is on the provision of new homes to keep up with the rising costs and affordability challenges of PRS.

The draft Housing Strategy identifies the need to provide better standards for private renters. Eliminating poor performing private sector landlords throughout the borough remains a priority, and the Council will seek to implement new licensing measures to drive improvements into this crucial part of the borough's housing offer.

16.3 Havering Homelessness & Rough Sleeping Strategy

Like many areas, Havering is under increasing pressure to find suitable temporary accommodation for families. Havering Prevention of Homelessness Strategy 2020-25 and Rough Sleeping comprehensively sets out Havering's approach, based around four objectives:

Objective 1: End long-term rough sleeping

Objective 2: Reducing the number of people in temporary accommodation

Objective 3: Supporting people who become homeless

Objective 4: Provide good value, integrated services that deliver excellent customer care.

Through the implementation of a selective licensing scheme, the Council will be able to enhance its work with landlords, improving their professionalism and understanding of legal obligations. This, along with tenant education on rights and responsibilities, will support tenancy sustainment in the PRS and help in reducing homelessness in the borough.

16.4 Empty Homes Programme

As part of the draft Housing Strategy, we have made a commitment to making better use of existing homes. The Council recognises that empty properties are a wasted resource for both the community and the owner and can cause a variety of issues such as reducing the supply of housing and attracting ASB. Bringing empty properties back into use is a priority for the Council and clamping down on those landlords that keep homes empty for years on end is a key step to increasing the supply and availability of affordable homes in the borough.

Bringing empty properties up to standard and back into use as decent livable homes is complementary to the objectives of the proposed selective licensing scheme.

16.5 Climate Action Plan

Havering's approach to tackling the climate emergency commitments, both for the Council operations and borough-wide emissions, is focused in nine work streams:

1. Built Environment
2. Business Continuity
3. Energy
4. People
5. Procurement

6. Public Protection
7. Transport
8. Stakeholder & Community
9. Waste

The Havering Climate Action Plan recognises the link between fuel poverty and energy and emissions, and that better insulating homes and making them more energy efficient are key actions in combatting both. Under public protection, part 6, there is focus on comfortable, affordably heated, cost-efficient homes.

Private property licensing schemes will contribute to achieving Havering's climate change vision by enforcing energy efficient standards in the PRS, helping to reduce the overall energy consumption and carbon emissions of the borough.

16.6 Anti-Social Behaviour

As outlined in the Havering Corporate Plan 2024 – 27, we are committed to working with tenants, residents and external partners to ensure that steps are taken to tackle ASB. The borough's Corporate Plan vision is one where Havering is 'A great place to live, work and enjoy' and where the Council 'Seeks to improve public safety, provide affordable housing, and maintain public spaces, focusing on safety initiatives and environmental sustainability'.

To tackle ASB problems, we have made it conditional on all private landlords who hold licences under the additional HMO or selective licensing schemes to prevent and combat ASB associated with properties they manage. Section 57(5) of the Housing Act 2004 gives a definition of ASB for the purposes of licensing under Parts 2 and 3 of the Act.

Additional and Selective Licensing will enable the Council to encourage landlords to work with their tenants to reduce ASB. Information and support will be available both online and through forums.

16.7 Regeneration Strategy

Havering Council has developed a comprehensive regeneration strategy aimed at transforming various areas within the borough to enhance community living, infrastructure, and economic vitality. Key components of the regeneration programme include:

- building modern, energy-efficient homes and well-connected neighbourhoods that are right for our borough
- providing new, high quality Council housing and increasing the amount of family-sized homes
- providing infrastructure to support new homes
- increasing opportunities for home ownership for Havering residents
- supporting healthy communities, fit for future generations
- supporting and investing in our local economy to create a thriving place
- protecting and celebrating our history and heritage
- We are also committed to improving the existing housing stock that we have.

Private property licensing schemes will act as a regulatory tool to ensure that landlords in regenerating areas maintain high property standards, supporting regeneration goals of creating more sustainable, inclusive, and well-maintained communities.

16 Further information

The Public Sector Equality Duty (PSED), Section 149 of the Equality Act 2010 requires the Council to have “due regard” to its equality aims when exercising its public functions. Havering Council believe that an Equality & Health Impact Assessment (EqHIA) is the best method to demonstrate compliance with the PSED. An Equality & Health Impact Assessment was carried out as part of these proposals. The results of the EqHIA are attached as **Appendix 5.**

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London Borough of Havering

Private Rented Sector: Housing Stock Condition and Stressors Report

October 2024

Executive Summary

Metastreet were commissioned by London Borough of Havering to review the housing stock in the district and assess housing stressors related to key tenures, particularly the private rented sector (PRS).

The detailed housing stock information provided in this report will facilitate the development and delivery of Havering 's housing strategy and enable a targeted approach to tackling poor housing.

The main aim of this review was to investigate and provide accurate estimates of:

- Current levels of private rented sector (PRS) properties and tenure change over time, including Houses in Multiple Occupation (HMO).
- Levels of serious hazards that might amount to a Category 1 and high scoring category 2 hazard (Housing Health & Safety Rating System (HHSRS)).
- Other housing related stressors, including service demand, population and deprivation linked to the PRS.
- Assist the council to make policy decisions, including the possible introduction of property licensing schemes under Part 2 & 3 of Housing Act 2004

Metastreet has developed a stock-modelling approach based on metadata and machine learning to provide insights about the prevalence and distribution of a range of housing factors. This approach has been used by a wide range of housing authorities to understand their housing stock and relationships with key social, environmental and economic stressors.

The models are developed using unique property reference numbers (UPRN) and a large range of council held and open-source data, which when combined, provide detailed analysis at the property level.

Data records used to form the foundation of this report includes but are not limited to:

Council tax	Electoral register	Other council interventions records	Tenancy deposit data
Housing benefit	Private housing complaints and interventions records	Environment records	Energy Performance data

Key Findings

- PRS Share & Distribution:
    - PRS accounts for 19.3% of Havering's housing stock, distributed across all 20 wards.
    - Seven wards have PRS percentages equal to or above the 2024 national average (19%).
- IMD & Possession Claims:
    - Four wards rank below decile 5 in aggregated IMD scores.
    - Havering had 155 landlord possession claims in Q4 2023, below the London borough average (212).
- Rents & Crime:
    - Havering's average rent (£1,250) is below the London average (£1,625) but above the national average (£825).
    - Residential crime rate (4.7 per 1,000) is below the London average (6.4 per 1,000) for 2022-23.
- Property Types & Hazards:
    - Houses make up 47% of PRS properties; bungalows are the least common (4%).
    - 5,058 PRS properties likely have serious housing hazards (HHSRS Category 1 & high-scoring Category 2), distributed across all wards.
    - Inspections (2021-24) found 1,298 hazards in 150 properties.
- Complaints & Energy Efficiency:
    - 1,459 complaints/service requests (linked to 1,208 PRS properties) recorded over five years.
    - 2,399 PRS properties have EPC ratings of E, F, or G.
- Enforcement:
    - 535 housing/public health notices and 135 penalty notices/prosecutions issued (2019-24).
- HMO Population & Hazards:
    - Total HMO population: 864 (410 licensed HMOs; 454 predicted shared amenity HMOs).
    - 426 HMOs are predicted to have serious hazards, affecting all wards.
- Complaints & Inspections:
    - 240 complaints (linked to 172 HMOs) recorded over five years.
    - 323 inspections (2021-24) identified 1,254 hazards in 139 HMOs, excluding Upminster.

    - Heaton (257) and Havering-atte-Bower (115) recorded the most HMO hazards.
- Enforcement:
    - 89 HMO enforcement interventions conducted (2019-24).

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1 Introduction & Project Objectives

Metastreet were commissioned by London Borough of Havering to review its housing stock with a focus on the following key areas:

- Residential property tenure changes
- Distribution of the PRS
- Condition of housing stock in the PRS
- Housing related stressors, including environment factors, regulatory interventions and deprivation.
- Houses in Multiple Occupation (HMO) and related stressors

The report provides the council with the evidence base for developing housing policy and service interventions. The report also helps satisfy the council's responsibility to review its housing stock as set out under Part 1, Section 3 of the Housing Act 2004.

The report details the findings of the stock and tenure modelling, including an introduction to the methodology. A combination of Havering 's data warehouse, machine learning, and modelling techniques have been used to pinpoint tenure and predict property conditions within its PRS housing stock. An advanced property level data warehouse has been developed to underpin the process.

For the purposes of this review, it was decided that a ward-level summary is the most appropriate basis to assess housing conditions across Havering , built up from property level data.

A number of bespoke predictive tenure models (Ti) have been developed as part of this project which are unique to Havering , they include:

- Private rented sector (PRS)
- Owner occupiers
- Serious PRS housing hazards (Category 1 and high scoring Category 2, HHSRS A-D)
- Houses in Multiple Occupation (shared amenities)

The appendices to the report contain a summary of the data and a more detailed report methodology.

2 Havering overview

London Borough of Havering forms part of Outer London. It is the easternmost London borough. The neighbouring districts (clockwise from south) are the London boroughs of Bexley (across the River Thames), Barking and Dagenham and Redbridge, the Essex districts of Epping Forest and Brentwood, and the unitary authority of Thurrock. Havering covers an area of 112.3km² [1].

2.1 Population

The Office of National Statistics (ONS) Census 2021 population estimates for Havering was 262,000 (Figure 1)[2]. This represents a 10.4% increase over the last decade.

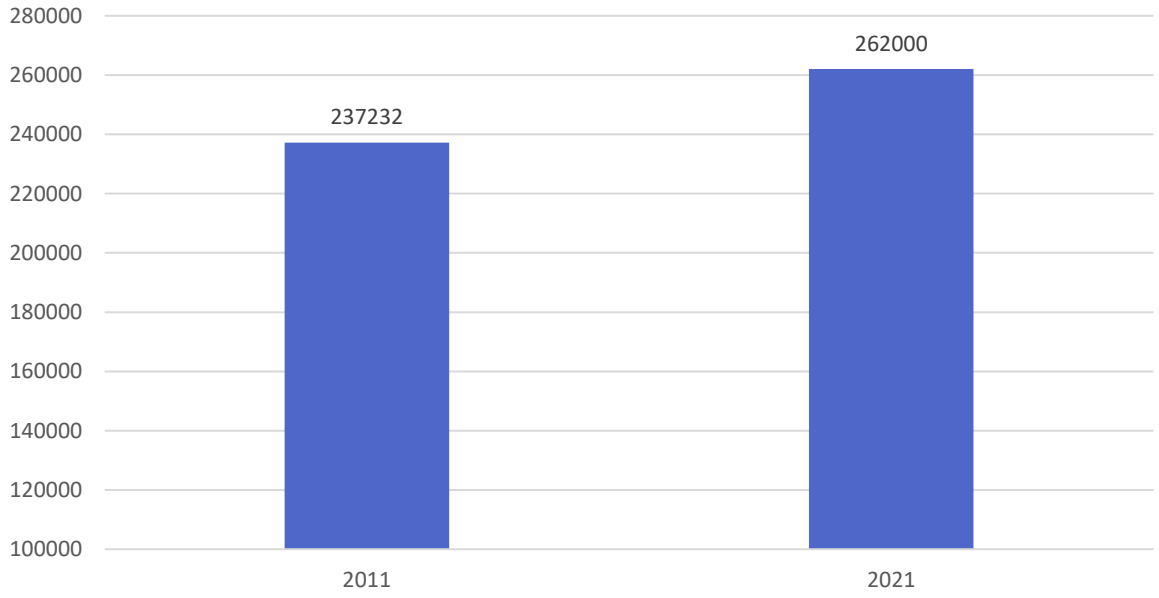


Figure 1. Population estimates, Census 2011 & 2021 (Source: Census ONS).

2.2 Household size

Household size (all tenures) provides an insight into how dwellings are occupied across the housing authority. One and two person households are most common in Havering. (Figure 2).[3]

[1] Wikipedia, September 2024, https://en.wikipedia.org/wiki/London_Borough_of_Havering
[2] Office for National Statistics – Census 2021, https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/populationandhouseholdestimatesenglandandwales/census2021
[3] Office for National Statistics – Census 2021, Household size https://www.ons.gov.uk/datasets/TS017/editions/2021/versions/3

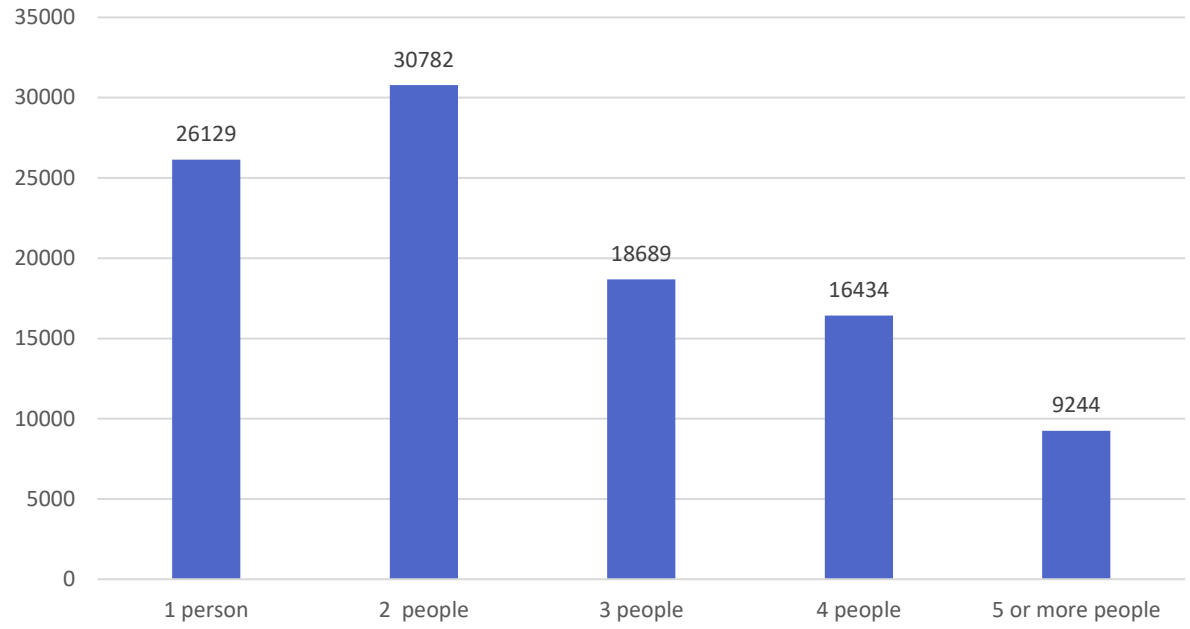


Figure 2. Havering household size (all tenures) (Source: Census 2021).

2.3 Deprivation

The Indices of Multiple Deprivation 2019 (IMD 2019) provide a set of relative measures of deprivation for LSOAs (Lower-layer super output areas) across England, based on seven domains of deprivation[4].

[4] ONS 2019 https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019,

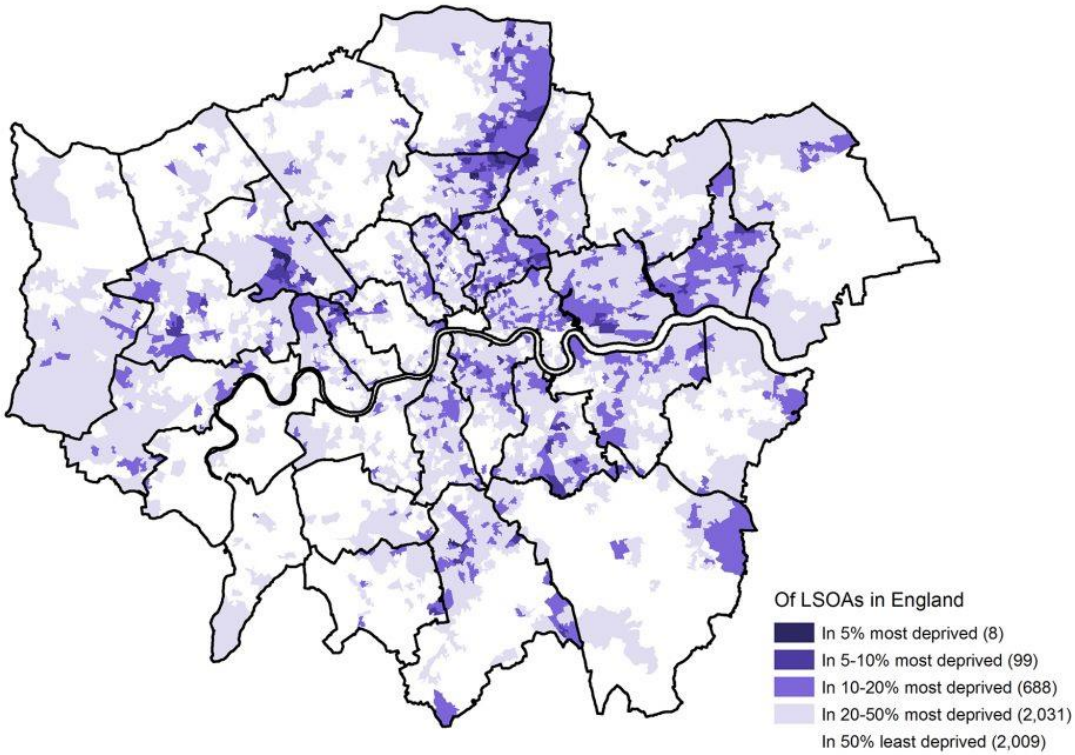


Figure 3. Distribution of deprivation across London (Source: London Datastore 2019, Map by London Datastore).

The darker shades are the most deprived areas. Havering ranks as the 179 (rank of average rank) most deprived borough in England out of 317.

To produce the ward level IMD 2019 data, government guidance and methodology to convert the data has been used[5]. LSOAs have been matched to wards using Open Geoportal lookup tables. IMD 2019 scores have been ranked (deciles) and weighted for population.

Average IMD 2019 decile aggregated at ward level reveals a clear picture of ward level deprivation (Figure 4 & Map 1). 1.0 on the graph represents the most deprived 10% areas and 5.0 represents 50% most deprived (national average).

Havering has a mixture of high and low deprivation wards. 4 of 20 wards have aggregated IMD rankings below decile 5 (national average) (Figure 4 & Map 1).

[5] MHCLG 2019 https://assets.publishing.service.gov.uk/media/5d8b364ced915d03709e3cf2/IoD2019_Research_Report.pdf

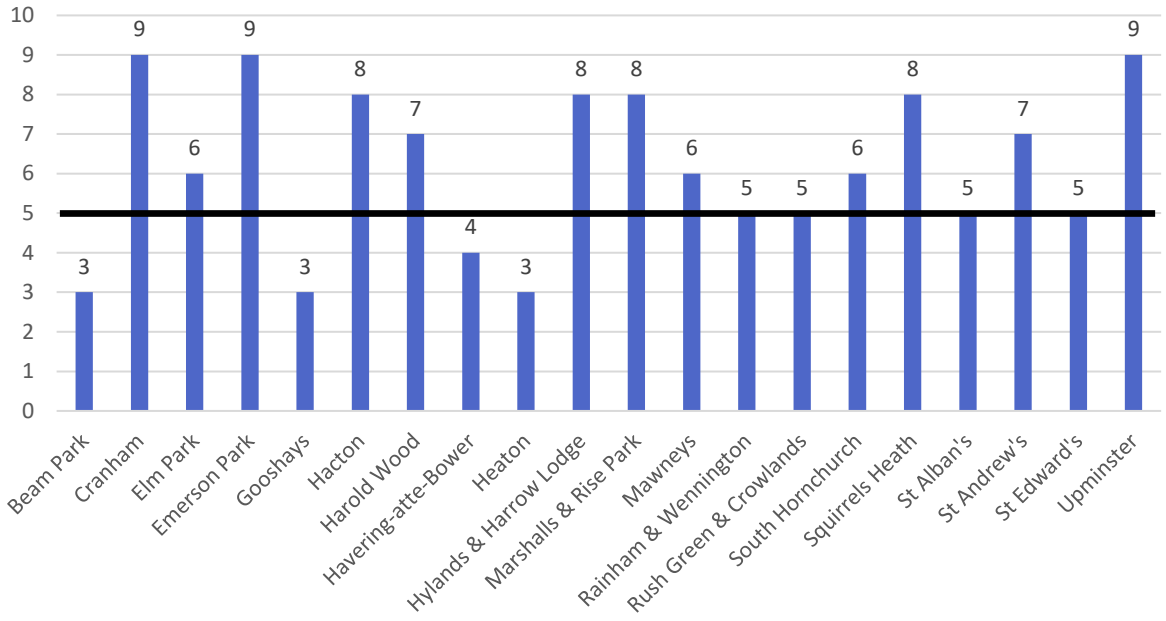
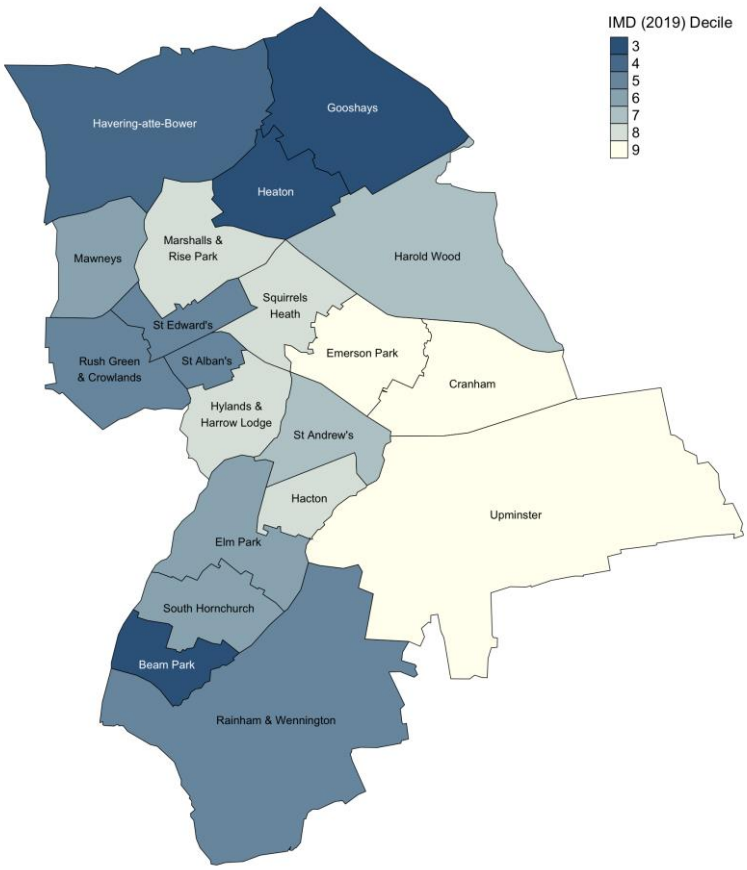


Figure 4. Average IMD (2019) decile by ward (Source: IMD 2019). Horizontal line shows the national average (decile 5).



Map 1. ***Distribution of Average IMD (2019) decile by ward (Source: ONS 2019, Map by Metastreet).***

2.4 Fuel Poverty

Fuel poverty is defined by the Warm Homes and Energy Conservation Act. A household is considered to be fuel poor if they have required fuel costs that are above average (the national median level); and were they to spend that amount, they would be left with a residual income below the official poverty line.

The fuel poverty score was produced by the Department for Business, Energy & Industrial Strategy using 2019 data and published in 2021. Over the coming years these figures are likely to change significantly because of acute fuel price increases during much of 2022/23. Notwithstanding this, Havering has a slightly lower proportion in fuel poverty (13.2%) than the national average (13.8%) (Figure 5) [6].

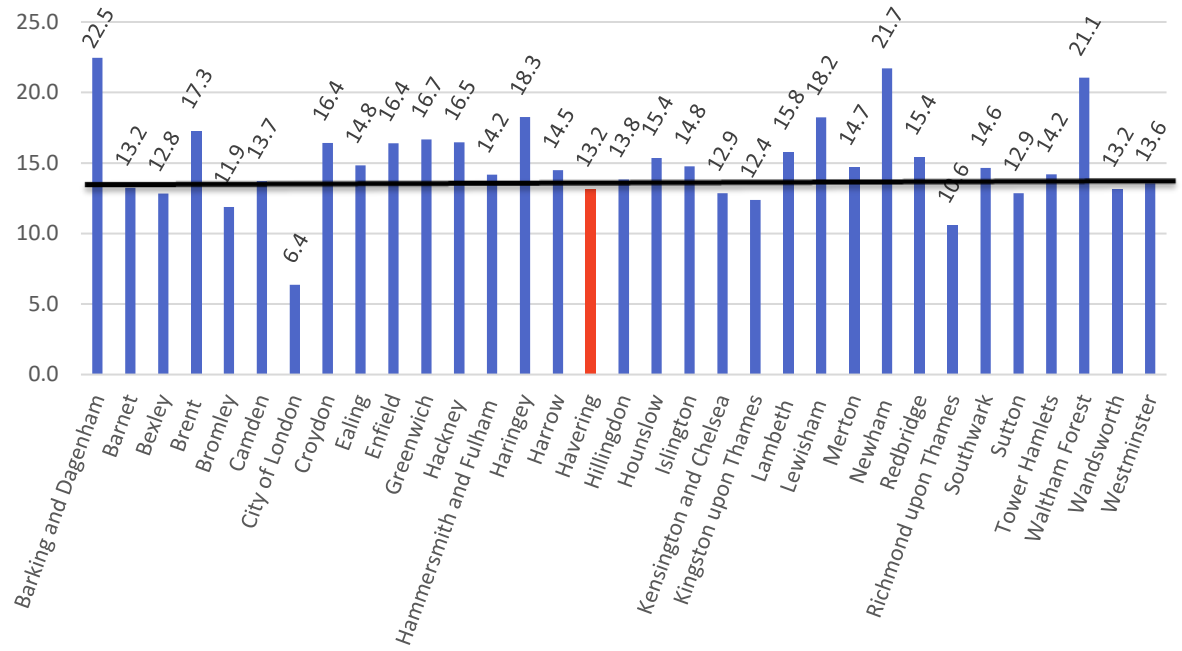


Figure 5. Proportion of households in fuel poverty (%) by selected comparable areas (BEIS 2019). Horizontal black line shows England average (13.4%).

[6] Department for Business, Energy & Industrial Strategy 2021 https://www.gov.uk/government/statistics/sub-regional-fuel-poverty-data-2021

2.5 Rented property possession claim rates

Havering has a below average number of landlord possession claims for London, with 155 in 2023 Q4 (Figure 6). The average number of claims for London boroughs during this period was 212. [7]

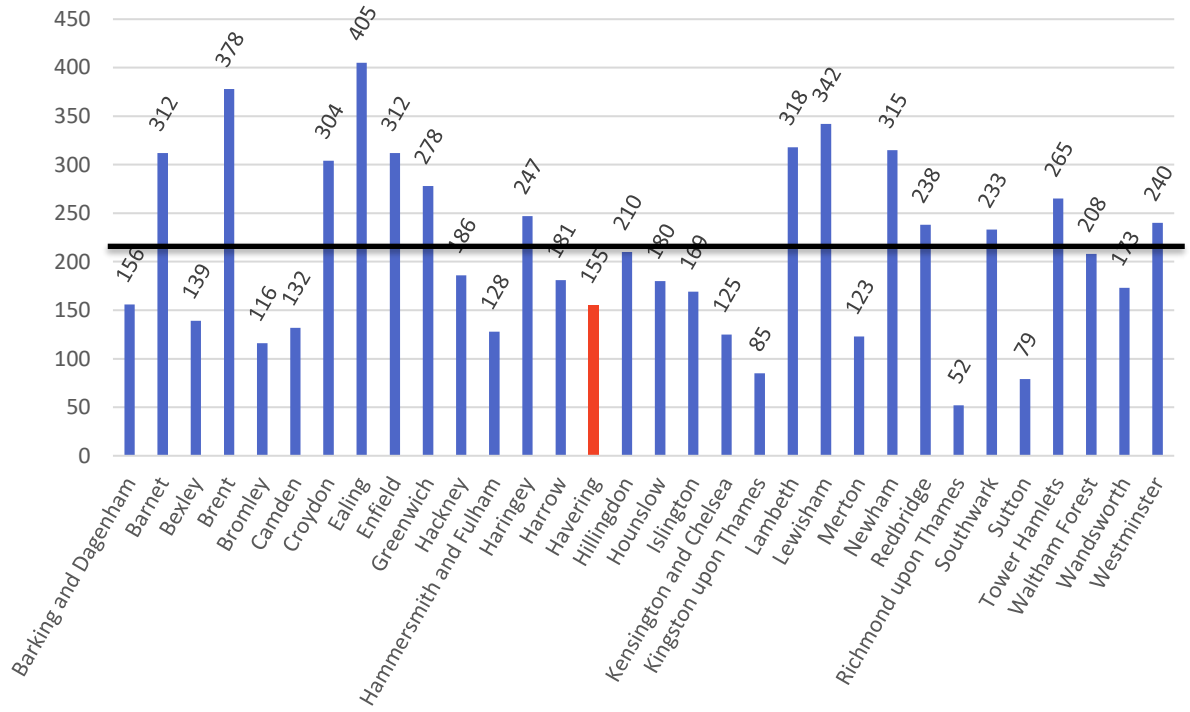


Figure 6. Number of possession claims issued by landlords (2022/23 Q4) for All London Boroughs (excluding City) (MOJ 2023) Horizontal black line shows London average (212).

2.6 Rents and affordability

Private rents vary by area. As this report is concerned with housing conditions and other housing stressors, we have looked at the average (median) rents for all dwelling types (all categories). Overall Havering has below average rents (all categories) for London (£1,250) (Figure 7). The national average is £825, and the London average is £1,625. [8]

[7] MOJ Possession claims by local authority (2023) https://lginform.local.gov.uk/reports/lgastandard?mod-area=E09000023&mod-group=AllBoroughInRegion_London&mod-metric=3497&mod-period=4&mod-type=namedComparisonGroup&mod-groupType=namedComparisonGroup

[8] ONS Private rental market summary statistics in England: April 2022 to March 2023 https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/privaterentalmarketsummarystatisticsinengland/october2022toseptember2023

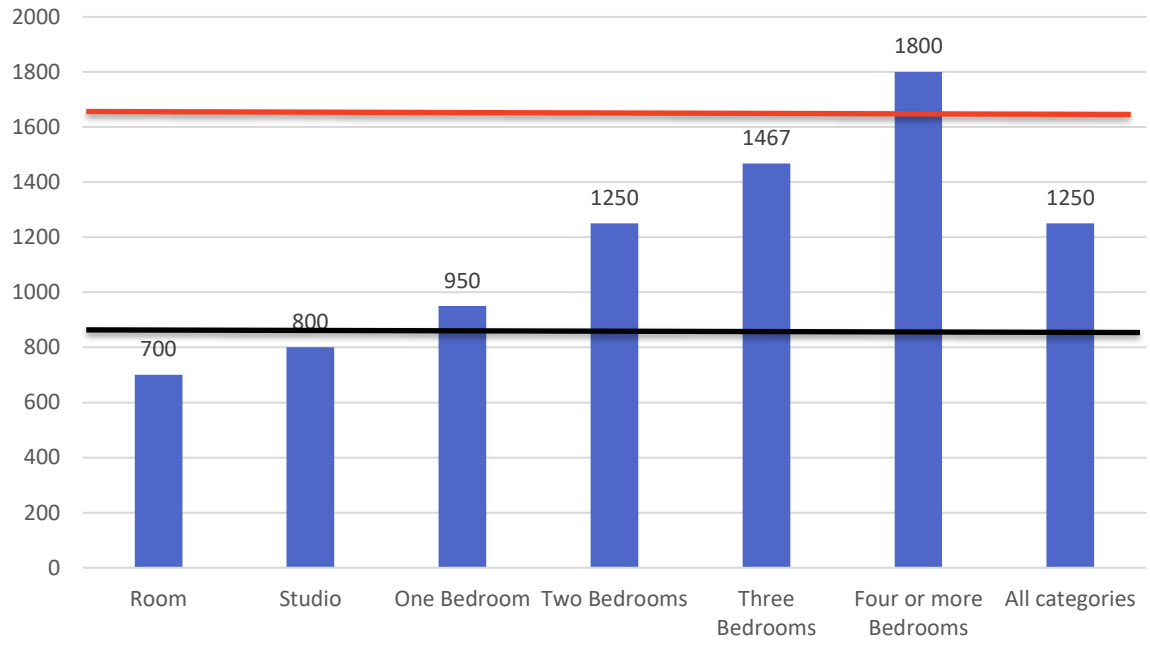


Figure 7. Median monthly rents (£) (1 April 2022 to 31 March 2023) (all categories) (Source: VOA 2024). Horizontal black line shows national average (£825). Horizontal red line shows London average (£1,625).

2.7 Residential property crime (burglary)

Havering (4.7 per 1,000) has a below average residential crime (burglary) rate over a twelve-month period (2022-2023) when compared to other London boroughs (Figure 8). When compared to other London boroughs, Havering has the 24th highest number of burglaries in London (Figure 8). [9]

[9] London Datastore September 2024 https://data.london.gov.uk/dataset/recorded_crime_summary

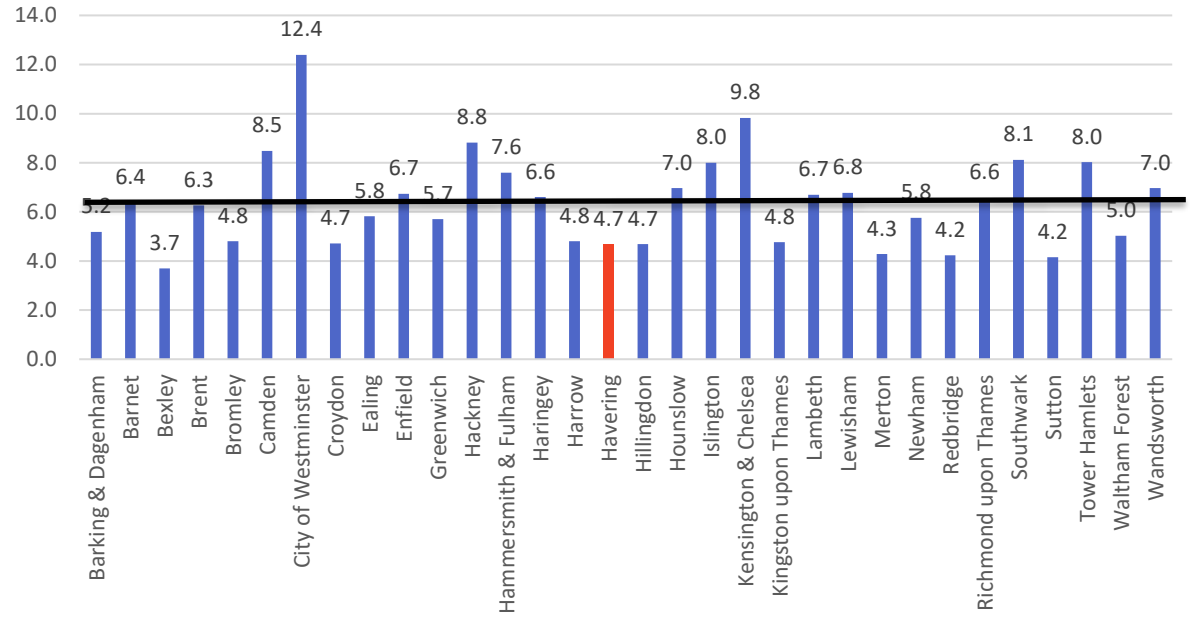


Figure 8. Residential property crime (burglary) rates per 1,000 population by London borough . Horizontal black line shows London average (6.4 per 1,000 population).

Over a one-year period, 859 burglaries were reported to the Metropolitan Police in Havering between January 2023 – December 2023. Heaton (104) and Gooshays (90) wards had the highest numbers of burglaries (Figure 9) [10].

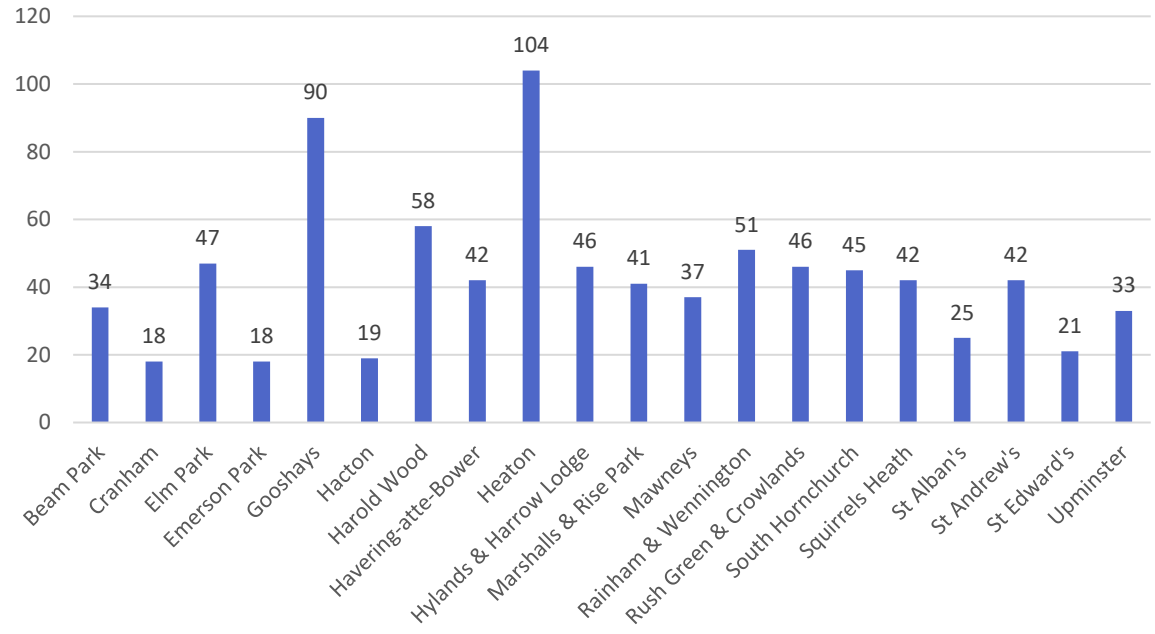


Figure 9. Residential Property Crime (burglary) by ward (2023).

[10] London Datastore September 2024 https://data.london.gov.uk/dataset/recorded_crime_summary

3 Results of housing stock and stressor modelling

3.1 Methodology

Tenure Intelligence (Ti) uses council held and publicly available data to identify tenure and analyse property stressors, including property conditions.

Data trends at the property level are analysed using machine learning to help predict the tenure of individual properties where they are not already known. Metastreet has worked with the council to create a residential property data warehouse. This has included linking millions of cells of council and externally held data to 109,048 unique property references (UPRN), excluding parent (shell properties) and non-dwellings. Therefore, only properties that are dwellings have been included in this study, common parts and ancillary properties have been excluded.

Machine learning is used to make predictions for each tenure and property condition based on a sample of known tenures and outcomes. Results are analysed to produce a summary of housing stock, predictions of serious hazards (HHSRS) and other stressors. To achieve the maximum accuracy, unique models are built for each council and tenure, incorporating individual authority data and using local known outcomes to train predictive models. Where a tenure or outcome is already known by the authority, this will be added to the final model.

Once the data warehouse was created, statistical modelling was used to determine tenure using the methodology outlined below. All specified and requested council held longitudinal data is five consecutive years, from April 2019 – March 2024.

Different combinations of risk factors were systematically analysed for their predictive power in terms of key outcomes. Risk factors that duplicated other risk factors but were weaker in their predictive effect were systematically eliminated. Risk factors that were not statistically significant were also excluded through the same processes of elimination.

For each UPRN a risk score was calculated using logistic regression. The selected risk factors have a better or worse than evens chance of being predictive. A decision tree model is then used to allocate properties to predefined outcomes.

A number of predictive models have been developed as part of this project which are unique to Havering . Known stressors linked to individual properties have been modelled to calculate population level incidences and rates.

It is important to note that this approach can never be 100% accurate as all large datasets and statistical models include some level of error. A more detailed description of the methodology and the specific factors selected to build predictive models for this project can be found in Appendix 2.

3.2 Results - Private rented sector

3.2.1 PRS Population and distribution

The private rented sector (PRS) in Havering has grown significantly since 2011 [11].

Based on tenure modelling (2024), Havering 's PRS is now calculated to be 19.3% of all housing stock (Figure 10). The 2021 Census reports the PRS in Havering to be 15.9% and 11.5% in 2011.

The difference is likely to be a result of distorted response rates in the PRS from the Census data, in part as a result of the March 2021 government-imposed coronavirus lockdown measures[12,13]. Further details of the differences between the Census 2021 and Ti 2024 results can be found in Appendix 2. It's important to note that Census tenure data is based on self-reported households, while Ti data is based on known dwellings within a local authority area. Some dwellings have multiple households. Therefore, the number of households should normally exceed the number of known dwellings (Table 9).

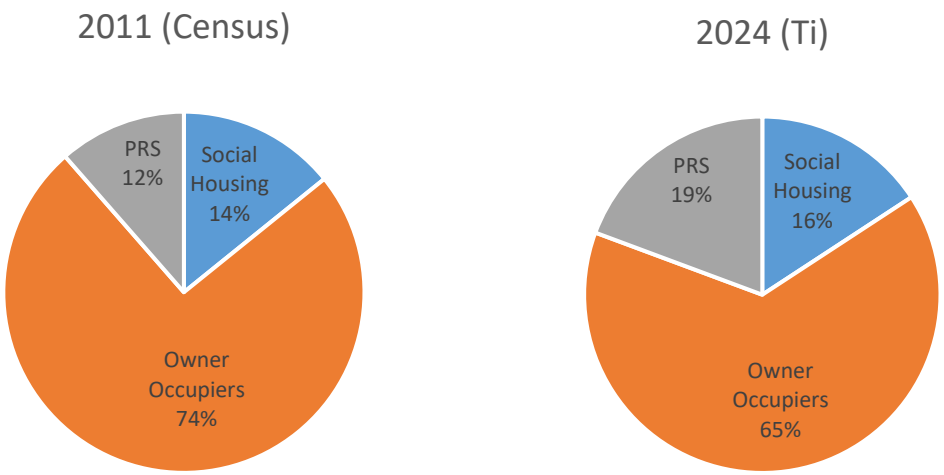


Figure 10. Tenure profile 2011 & 2024 (Source: ONS & Metastreet Ti model).

[11]Census 2021 https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates
[12]Timeline of UK government coronavirus lockdowns and restrictions, https://www.instituteforgovernment.org.uk/data-visualisation/timeline-coronavirus-lockdowns
[13]Onlondon Article (July 2022) https://www.onlondon.co.uk/london-councils-briefing-warns-that-census-may-have-significantly-undercounted-capitals-population/

Tenure percentage change over the last two decades in Havering has been in line with the national trend (Figure 11), however the gradual PRS increase is part of a long term nationwide and regional trend.

The PRS in the UK has grown from 9.4% of housing stock in 2000 [14] to 19% of households 2023 [15]. The PRS remains the second largest housing tenure in England. [16] .

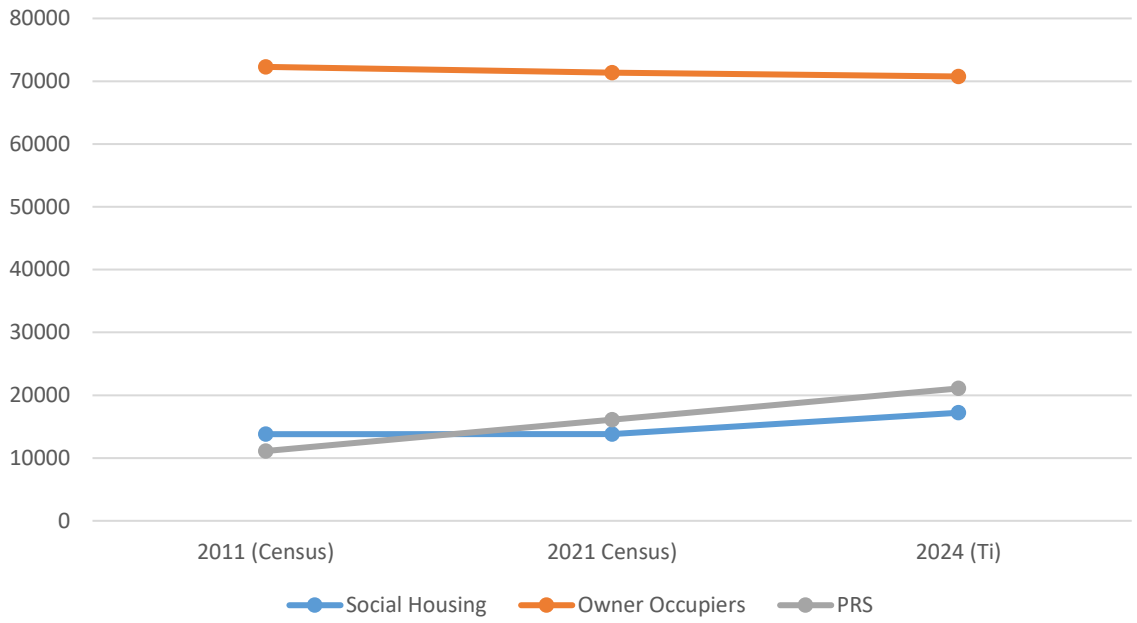


Figure 11.Havering tenure change and total households/dwelling stock, 2011, 2021 & 2024(Source: ONS & 2024 Ti).

Social rented housing stock has increased over the last decade; however, owner occupation has decreased (Figure 11 and Table 1).

[14] The profile of UK private landlords Scanlon K & Woodhead C CML research. LSE London. December 2017 www.cml.org.uk
[15] EHS Headline 2022-2023, https://www.gov.uk/government/statistics/chapters-for-english-housing-survey-2022-to-2024-headline-report
[16] EHS Headline 2022-2023, https://www.gov.uk/government/statistics/chapters-for-english-housing-survey-2022-to-2024-headline-report

Table 1. Number of households & dwellings by tenure 2011, 2021 & 2024 (Source: ONS & Ti 2024).

Tenure	2011 (Census)	2021 Census)	2024 (Ti)
Social Housing	13,799	13,807	17,211
Owner Occupiers	72,284	71,355	70,755
PRS	11,116	16,114	21,082
Total	97,119	101,276	109,048

The data in Table 1 shows a clear discrepancy between Census recorded households (2021) and the number of known dwellings (Ti 2024), with at least 7,772 households missing from the 2021 Census data when compared to known dwellings in 2024.

The PRS in Havering is distributed across all 20 wards (Figure 12). The number of PRS dwellings per ward ranges from 2,235 (Rush Green & Crowlands) to 387 (Emerson Park).

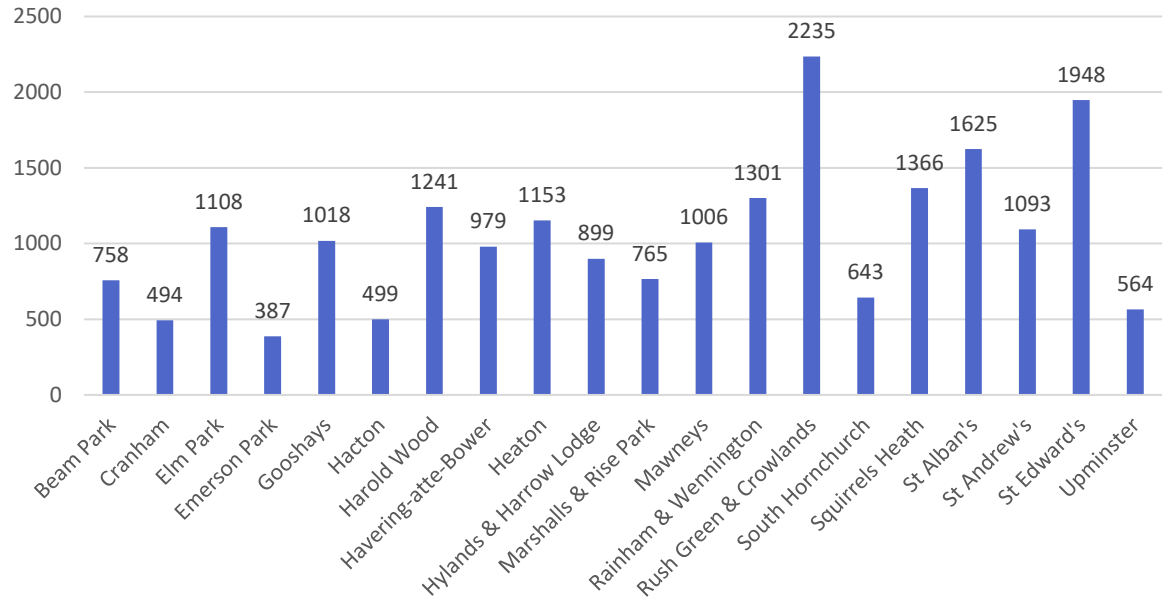


Figure 12. Number of PRS dwellings by ward (Source: Ti 2024).

The percentage of PRS properties in each ward ranges between 44.6% (St. Alban's) and 9.1% (Cranham) (Figure 13 & Table 2). Therefore, 7 out of 20 Havering wards have an equal or higher percentage PRS than the national average in 2024 (19%)[17].

[17] EHS Headline 2022-2023, https://www.gov.uk/government/statistics/chapters-for-english-housing-survey-2022-to-2024-headline-report

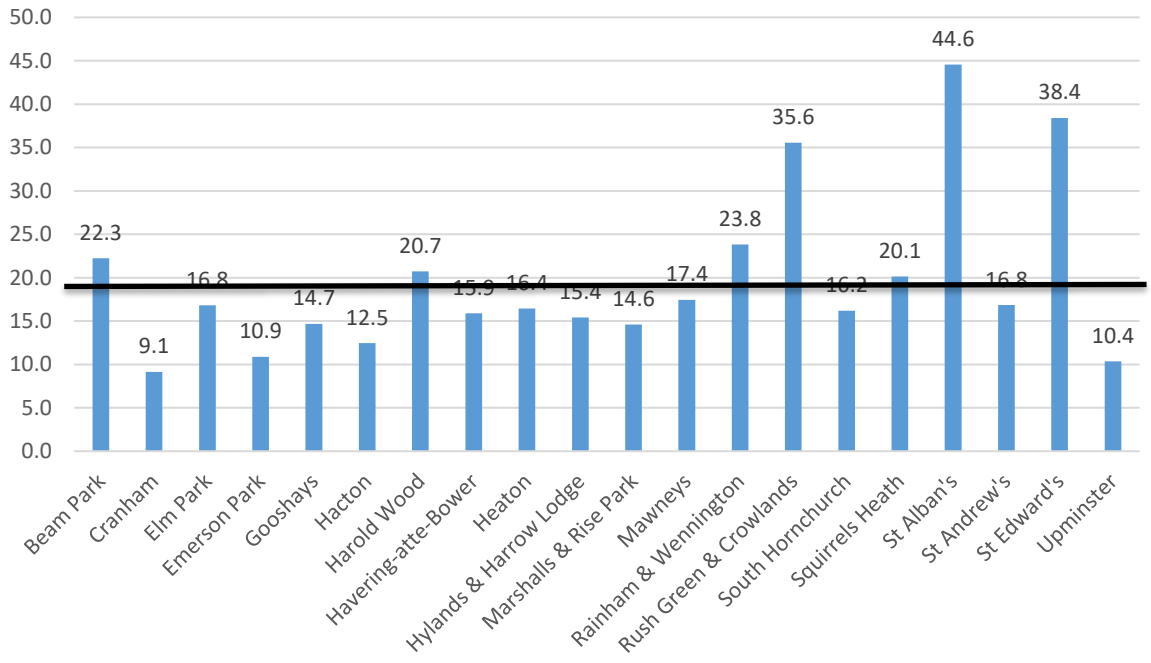


Figure 13. Percentage of PRS dwellings by each ward (Source Ti 2024). ***Horizontal black line shows national average 2024 (19%)***

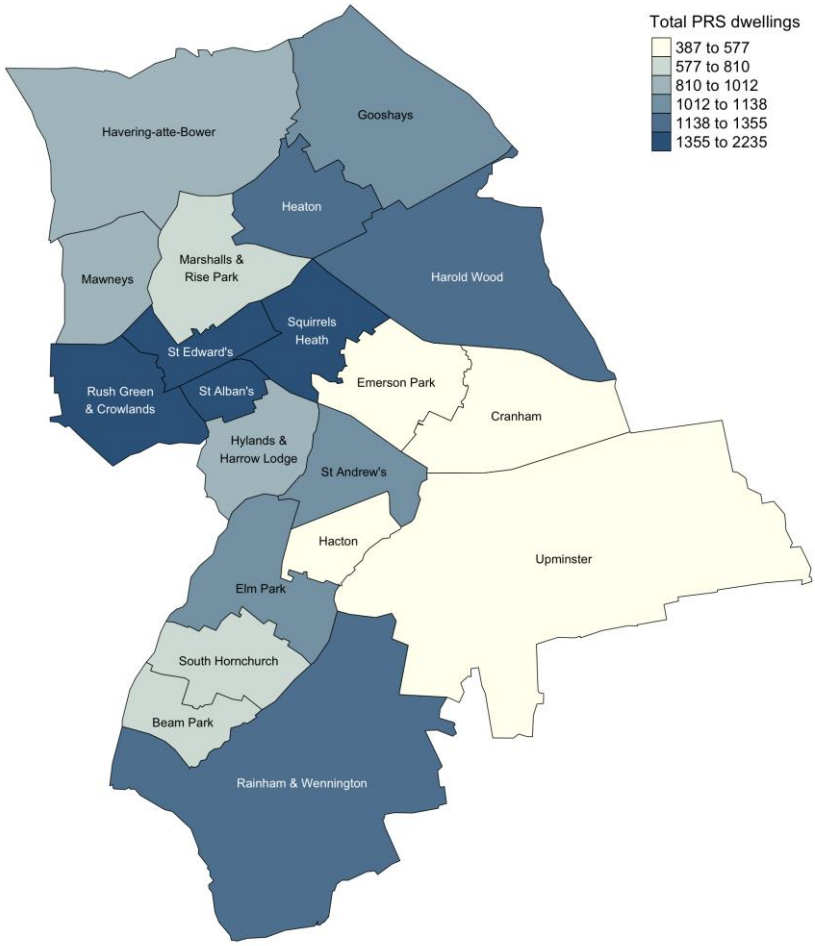
The table below shows the total PRS dwellings in each ward and the percentage PRS compared to the total housing stock (Table 2).

Table 2. Number and percentage of PRS properties by ward (Source Ti 2024).

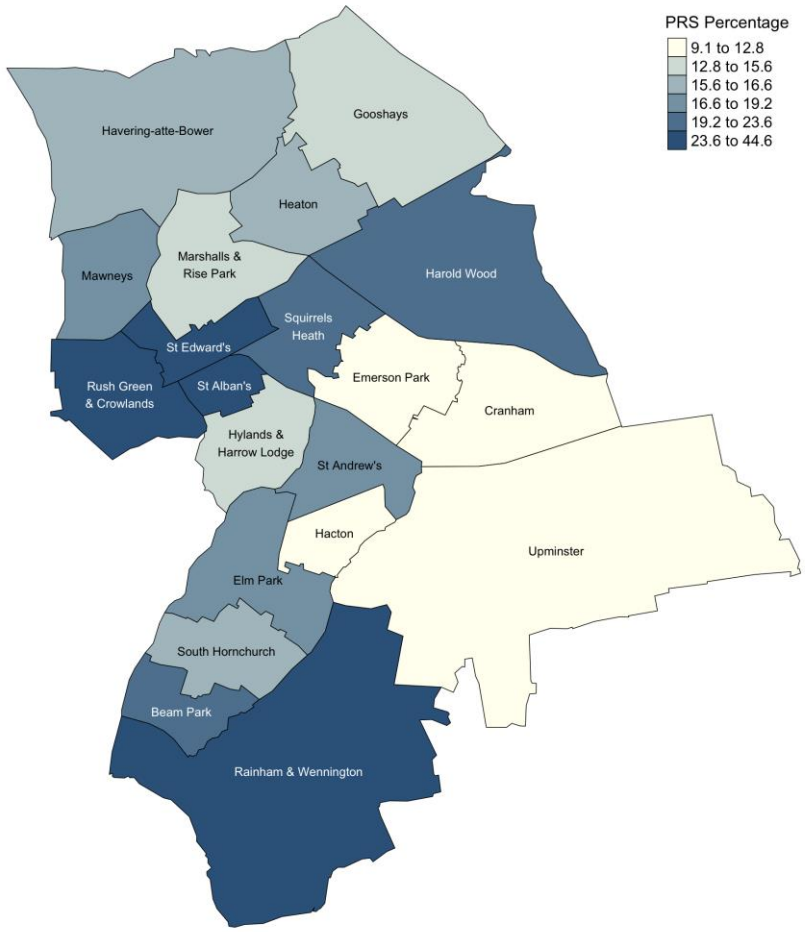
Ward	PRS dwellings	% PRS
Beam Park	758	22.3
Cranham	494	9.1
Elm Park	1,108	16.8
Emerson Park	387	10.9
Gooshays	1,018	14.7
Hacton	499	12.5
Harold Wood	1,241	20.7
Havering-atte-Bower	979	15.9
Heaton	1,153	16.4
Hylands & Harrow Lodge	899	15.4
Marshalls & Rise Park	765	14.6
Mawneys	1,006	17.4
Rainham & Wennington	1,301	23.8
Rush Green & Crowlands	2,235	35.6
South Hornchurch	643	16.2
Squirrels Heath	1,366	20.1

St Alban's	1,625	44.6
St Andrew's	1,093	16.8
St Edward's	1,948	38.4
Upminster	564	10.4

PRS properties are distributed across Havering (Maps 2 & 3).



Map 2. Number of PRS properties in Havering (Source: Ti 2024, Map by Metastreet).



Map 3. PRS properties as percentage of dwellings in Havering (Source: Ti 2024, Map by Metastreet).

3.2.2 Housing conditions

Housing conditions are affected by the level of maintenance and quality of repair, the age of the property, thermal efficiency, and type of construction. Category 1 (HHSRS) hazards have a physiological or psychological impact on the occupant and may result in medical treatment [18]. There is also a serious impact on public services: hazardous conditions in the PRS are estimated to cost the NHS £340 million a year [19].

[18] Housing Health and Rating System, Operation Guidance, 2006, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/15810/142631.pdf
[19] House of Commons Committee of Public Accounts: https://committees.parliament.uk/committee/127/public-accounts-committee/news/165326/pac-private-rented-housing-failing-far-too-often-to-provide-safe-and-secure-homes/

In 2024, 12% of private rented dwellings in England had at least one Category 1 hazard; this was a higher proportion than the average for the total housing stock (8%), and significantly higher than owner occupied dwellings (9%) or social rented dwellings (4%). Furthermore, the private rented sector had the highest proportion of non-decent homes (21%)[20]. It is notable that there is a gradient of risk with age of the property, the risk being greatest in dwellings built before 1900, and lowest in the more energy efficient dwellings built after 1980 [21].

A local authority's property age profile can have an impact on housing conditions. Havering has a significant number of residential properties (41.9%) built pre-Second World War [22]. The council tax band provides an indication of relative distribution of property value in each ward. (Figure 14).

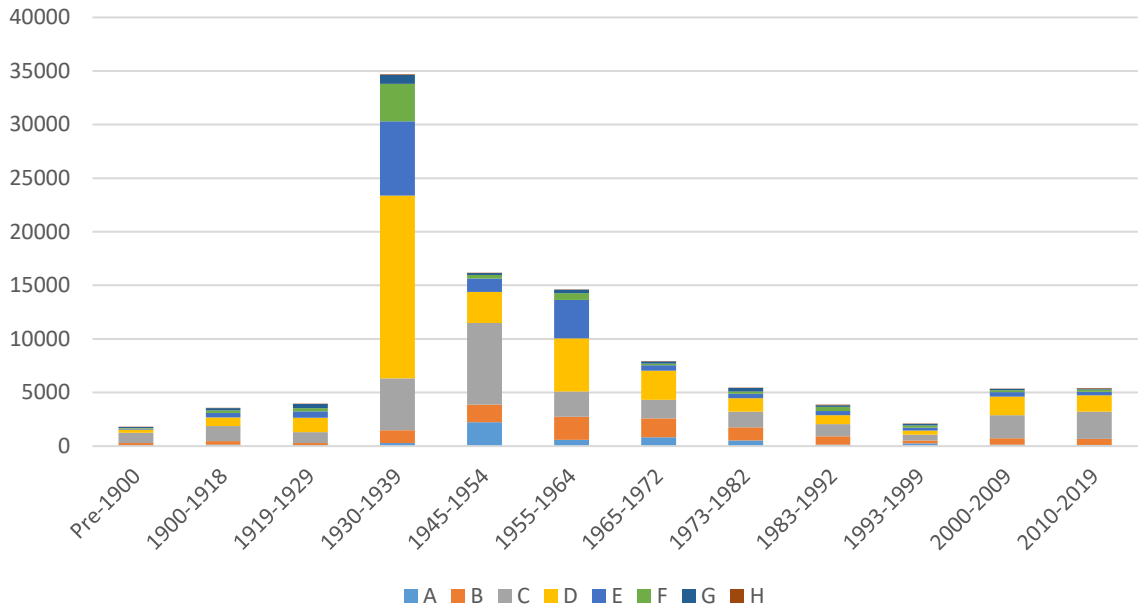


Figure 14. All housing stock age profile and council tax band (Source: VOA 2019).

A local authority's property type profile offers an indication of housing density, construction type and other population factors. The most common private rented property type in Havering are houses (47%), while bungalows are the least common property types (4%) (Figure 15).

[20] EHS Headline 2022-2023, https://www.gov.uk/government/statistics/chapters-for-english-housing-survey-2022-to-2024-headline-report
[21] Housing Health and Rating System, Operation Guidance, 2006, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/15810/142631.pdf
[22] VOA 2019 https://www.gov.uk/government/statistics/council-tax-stock-of-properties-2019

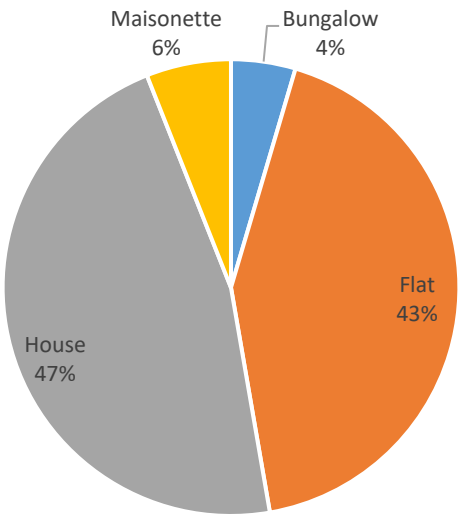


Figure 15. Private rented property type as a percent of total (Source: Havering matched EPC records 2024).

Using a training sample of properties that are known to have at least one serious housing hazard (Category 1 and high scoring Category 2, HHSRS), it is possible to predict the number of PRS properties with at least one serious hazard across the area. Further details of the method can be found in Appendix 2.

There are **5,058** private rented properties in Havering that are likely to have at least one serious housing hazard (Category 1 and high scoring Category 2, HHSRS). PRS properties with serious hazards are distributed across all wards. St Alban's (452) and Rush Green & Crowlands (432) have the highest number of properties with at least one Category 1 and/or high scoring Category 2 hazards (Figure 16 & Map 4).

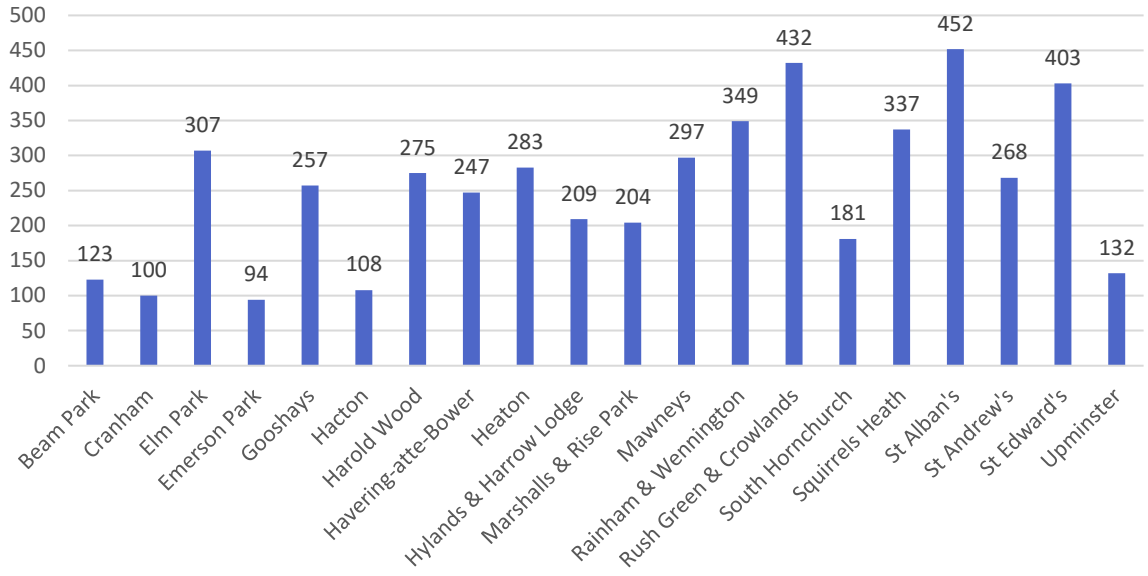
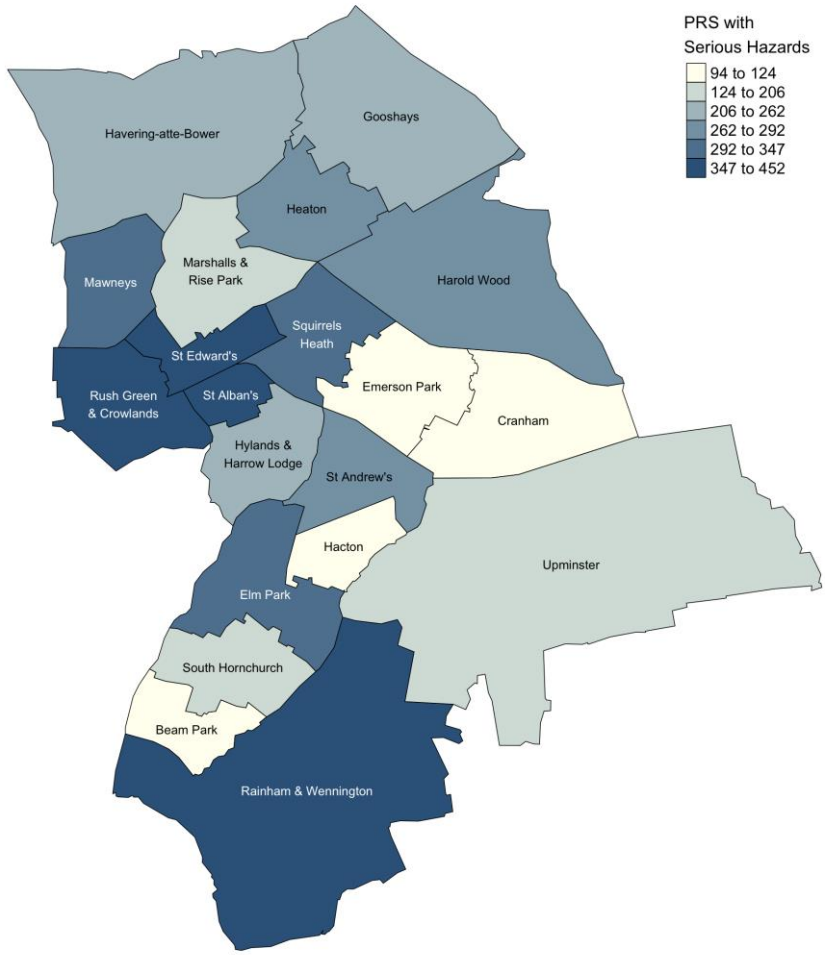


Figure 16. Predicted number of dwellings with serious hazards by ward (Source: Ti 2024).

Category 1 and/or high scoring Category 2 hazards in the PRS are distributed across Havering (Map 4).



Map 4. Distribution of PRS dwellings with predicted Category 1 and/or high scoring Category 2 hazards (HHSRS) (Source: Ti 2024, map by Metastreet).

The rates of Category 1 and/or high scoring Category 2 HHSRS hazards per 100 PRS properties reveals a wide distribution across Havering (Figure 17). Mawneys (29.5 per 100) has the highest rates of predicted PRS properties with serious hazards. The national average for category 1 hazards in the PRS is 12%[23].

[23] EHS Headline 2022-2023, https://www.gov.uk/government/statistics/chapters-for-english-housing-survey-2022-to-2023-headline-report/introduction-and-key-findings

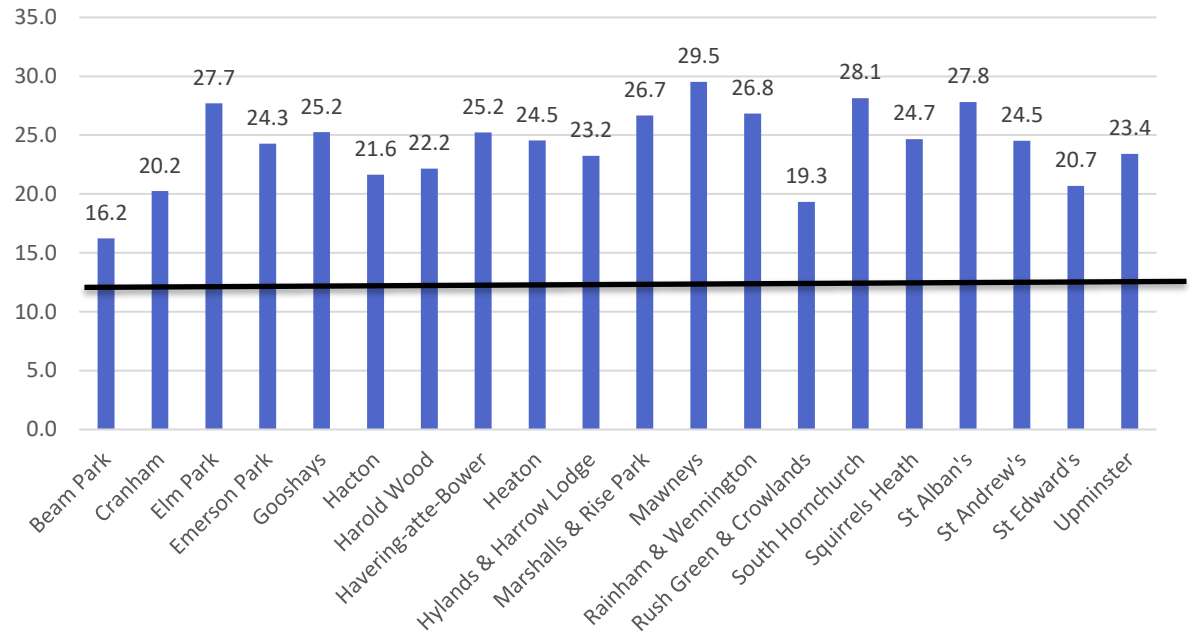


Figure 17. Rates per 100 PRS properties of predicted Category 1 and/or high scoring Category 2 HHSRS hazards by ward (Source: Ti 2024). Horizontal black line shows national average for Category 1, 2022 (12 per 100)

3.2.3 PRS Inspection results

Havering has an active inspection programme. Between 2021-2024 Havering officers undertook 388 property inspections.

The Housing Health and Safety Rating System (HHSRS) is a system for assessing housing conditions. A hazard is any risk of harm to the health or safety of an actual or potential occupier of accommodation that arises from a deficiency in the dwelling, building or land in the vicinity.

During officer inspections, 1298 hazards (Category 1 & 2, HHSRS) were identified across 150 properties. Therefore 38.6% of properties inspected were found to have at least 1 hazard (Category 1 & 2, HHSRS).

Hazards identified during officer inspections are distributed across all wards, except Upminster. New Heaton (257) and Havering-atte-Bower (155) have the highest number of identified hazards (Figure 18).

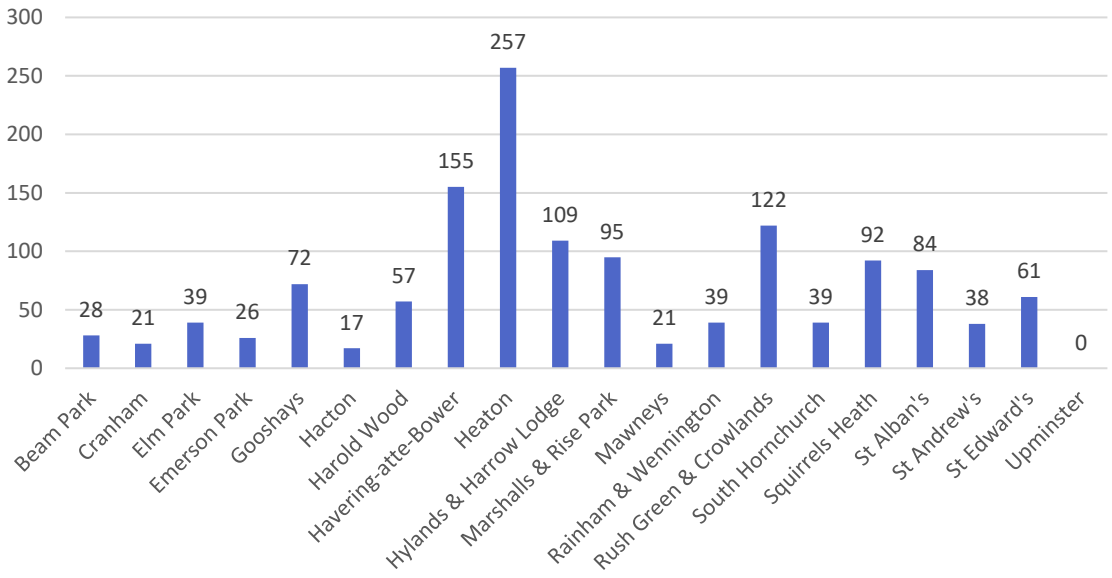
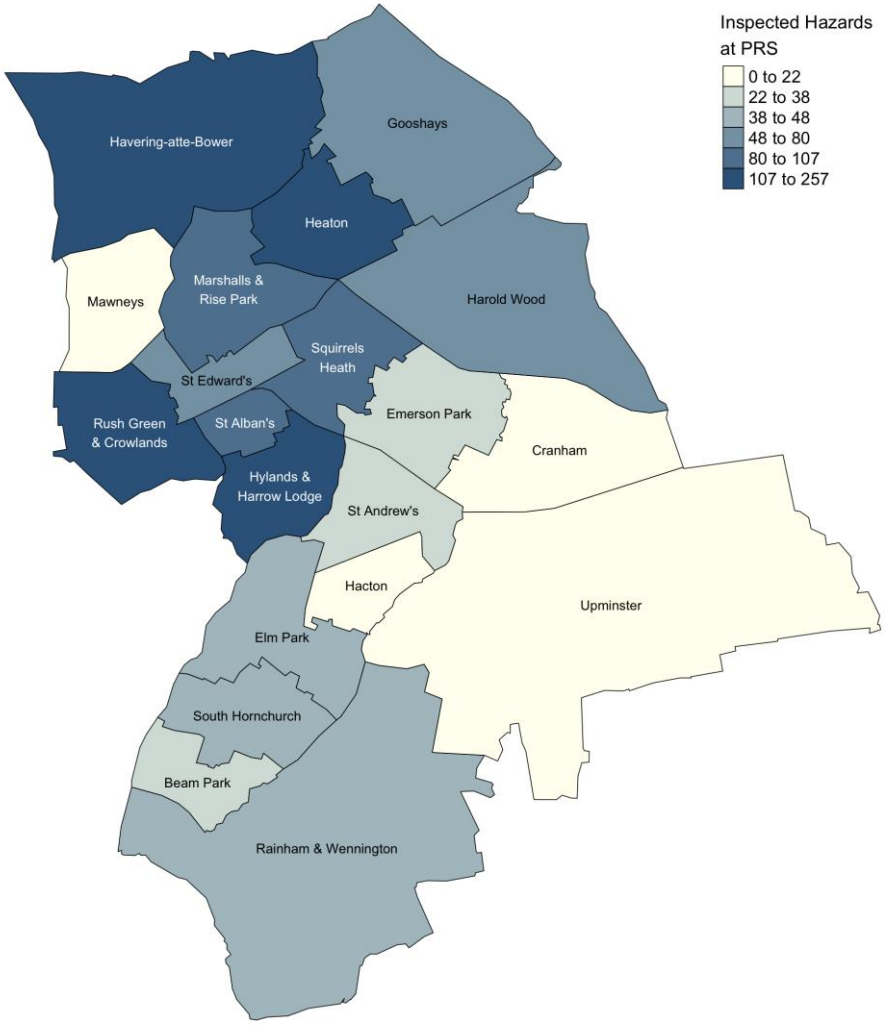


Figure 18. Hazards identified during inspections (2021-2024) (all PRS) by ward (Source: TI 2024).

Identified hazard are distributed across most of the borough. Concentrations of identified hazards are predominantly from the northern wards (Map 5).



Map 5. Hazards identified during inspections (2021-2024) (all PRS) (Source: TI 2024, Map by Metastreet).

3.2.4 PRS complaints and service requests

Complaints and service requests made by PRS tenants to the council about poor property conditions and inadequate property management are a direct indicator of low quality PRS. Havering recorded 1,459 complaints and service requests from private tenants and others linked to 1,208 PRS properties over a 5-year period. Rush Green & Crowlands (171) and St Alban's (150) had the highest number of complaints and service requests (Figure 19 & Map 6).

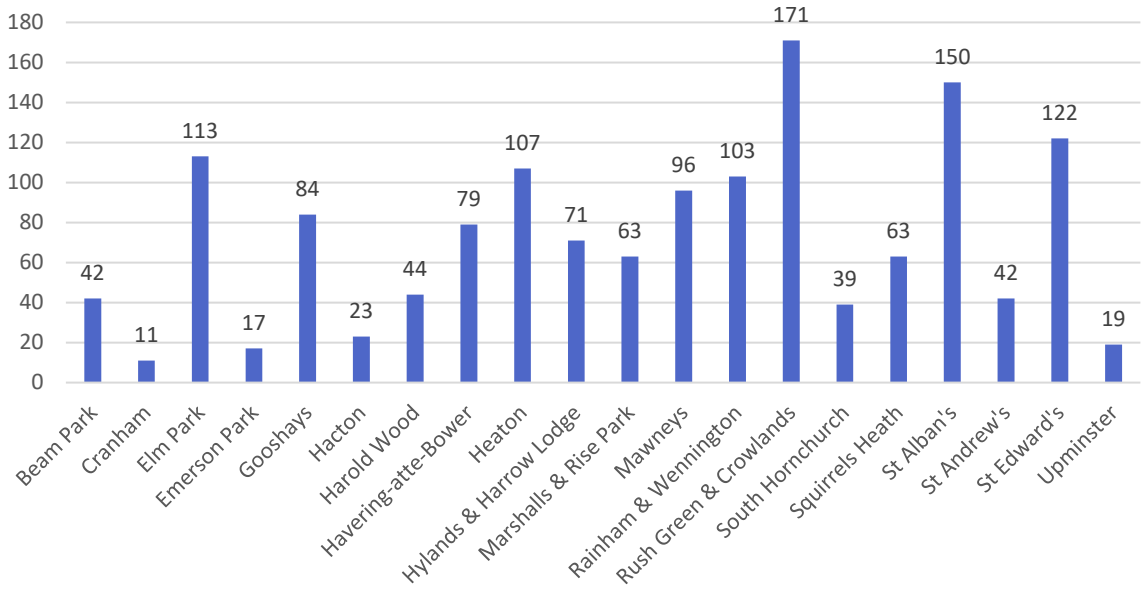
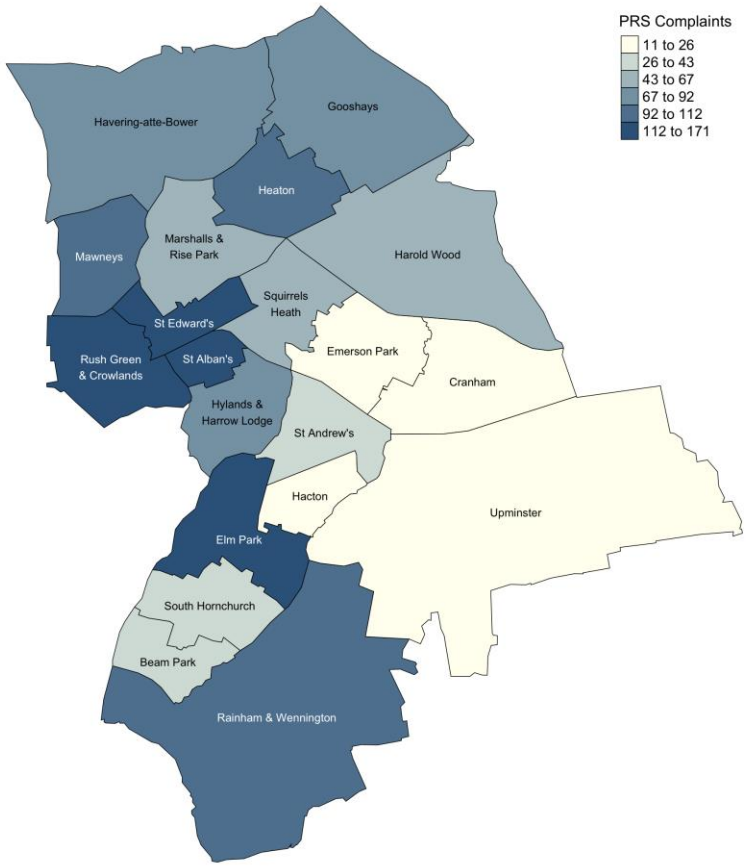


Figure 19. PRS complaints and service requests made by private tenants and others to the Council (Source Ti 2024)



Map 6. Distribution of PRS service requests and tenant complaints (Source: Ti 2024, Map by Metastreet).

An EPC rating is an assessment of a property's energy efficiency. It's primarily used by buyers or renters of residential properties to assess the energy costs associated with heating a house or flat. The rating is from A to G. A indicates a highly efficient property, G indicates low efficiency.

The energy efficiency of a dwelling depends on the thermal insulation of the structure, on the fuel type, and the size and design of the means of heating and ventilation. Any disrepair or dampness to the dwelling and any disrepair to the heating system may affect efficiency. The exposure and orientation of the dwelling are also relevant.

As part of this project **17,261** EPC ratings were matched to PRS properties. All figures have been modelled from this group. In Havering most dwellings fall in band D (43%) (Figure 20).

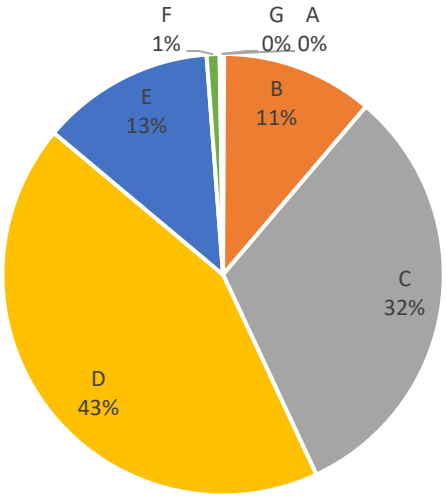


Figure 20. Distribution of Energy Performance Certificate ratings in PRS (Rating A-G) (Source: Ti 2024).

The Minimum Energy Efficiency Standard (MEES) came into force in England and Wales on 1 April 2018. The regulation applies to PRS properties and mandates that all dwellings must have an EPC rating of A-E to be compliant. It has been calculated using the matched addresses that 13.9% of PRS properties in Havering have an E, F, and G rating. 1.2% of PRS properties have an F and G rating (Figure 20). Extrapolated to the entire PRS, 252 PRS properties are likely to fail the MEES statutory requirement.

The statistical evidence shows that there is a continuous relationship between indoor temperature and vulnerability to cold-related death [24]. The colder the dwelling, the greater the risk. The percentage rise in deaths in winter is greater in dwellings with low energy efficiency ratings. Children in cold homes are twice as likely to suffer from a variety of respiratory problems [25]. There is a gradient of risk with age of the property, the risk being greatest in dwellings built before 1850, and lowest in the more energy efficient dwellings built after 1980[26]. Therefore, the F and G properties present a serious risk to the occupants' health, particularly if over the age of 65 (Figure 20, 21 & 22).

Havering has 2,399 PRS EPC ratings that are E, F, & G. EPC ratings E, F, & G represent properties with the least energy efficiency. St Albans's(225) has the highest number of EPC rating E-G (Figure 21).

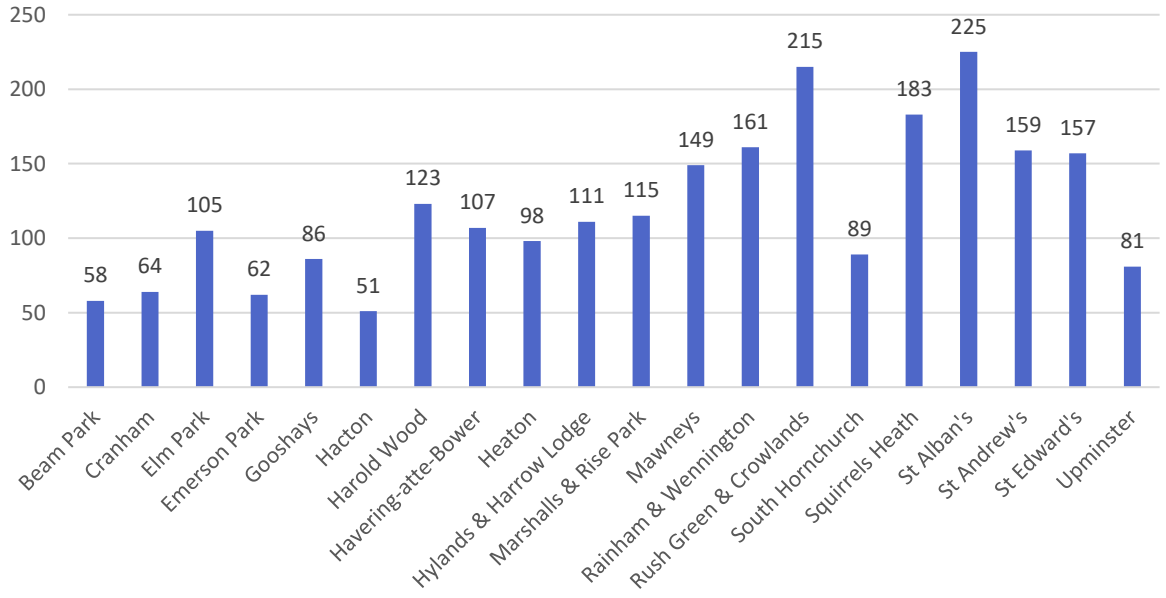


Figure 21. Energy Performance Certificate ratings in PRS by ward (Rating E, F & G) (Source: Ti 2024).

Havering has 206 PRS EPC ratings that are F, & G. St Andrew's (21) has the highest number of EPC rating E-G (Figure 22).

[24] Housing Health and Rating System, Operation Guidance, 2006 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/15810/142631.pdf
[25] Health Equity in England: The Marmot Review 10 Years On, 2020 https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on
[26] Housing Health and Rating System, Operation Guidance, 2006 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/15810/142631.pdf

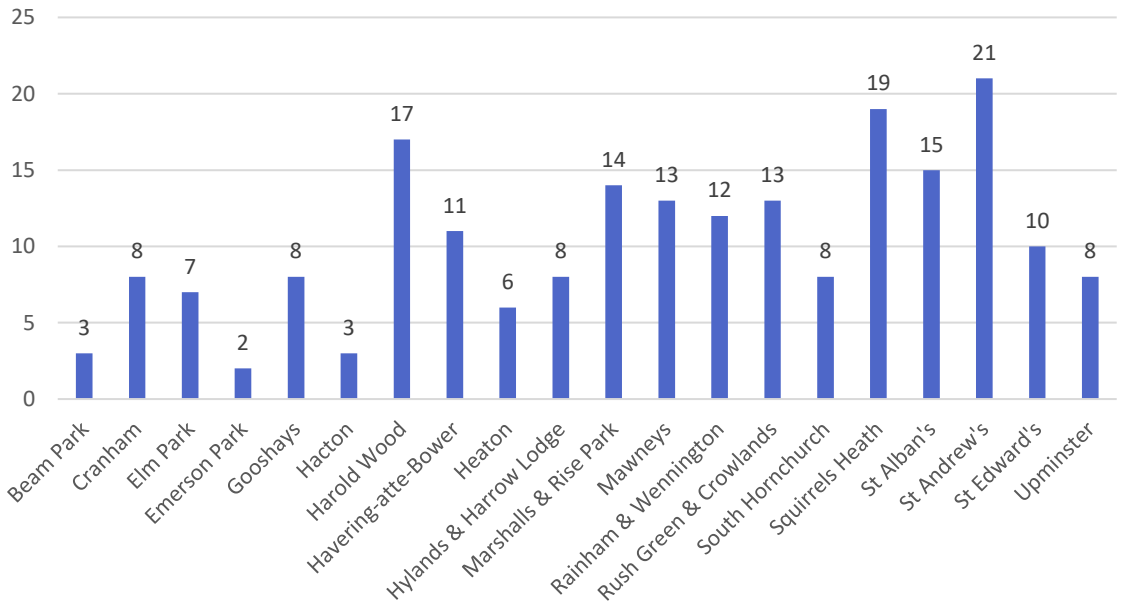


Figure 22. Energy Performance Certificate ratings in PRS by ward (Rating F & G) (Source: Ti 2024).

The difference between the current and potential energy performance score (EPC) helps owners of residential property understand what practical improvements can be made to improve a properties energy performance. The gap between current and potential EPC scores represents the opportunity to enhance energy performance within a reasonable economic envelope (Figure 23).

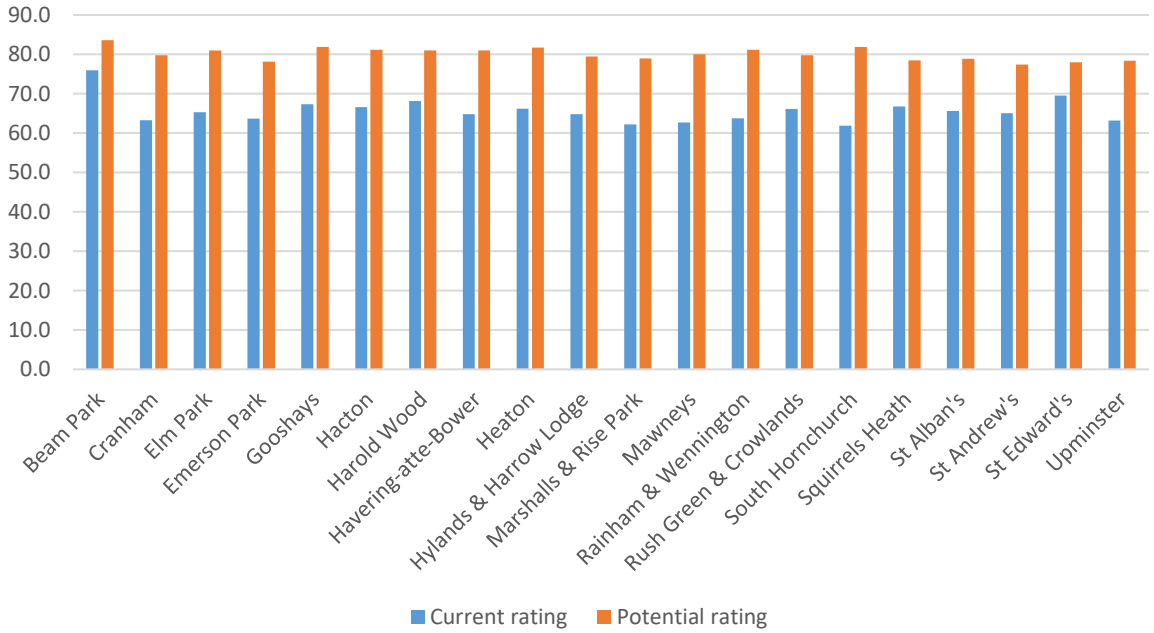


Figure 23. Current and Potential Energy Performance Certificate score (mean average) in PRS by ward (Source: Ti 2024).

3.2.5 PRS enforcement and regulation interventions

Havering uses a range of statutory housing and public health notices to address poor housing standards in the PRS. Interventions can be a result of a complaint being made by a tenant about their accommodation or as a result of a proactive inspection. Over a 5-year period (2019-24) Havering served 535 housing and public health notices (Figure 24 & Map 7)). St Alban's (69) has the highest number of statutory notices.

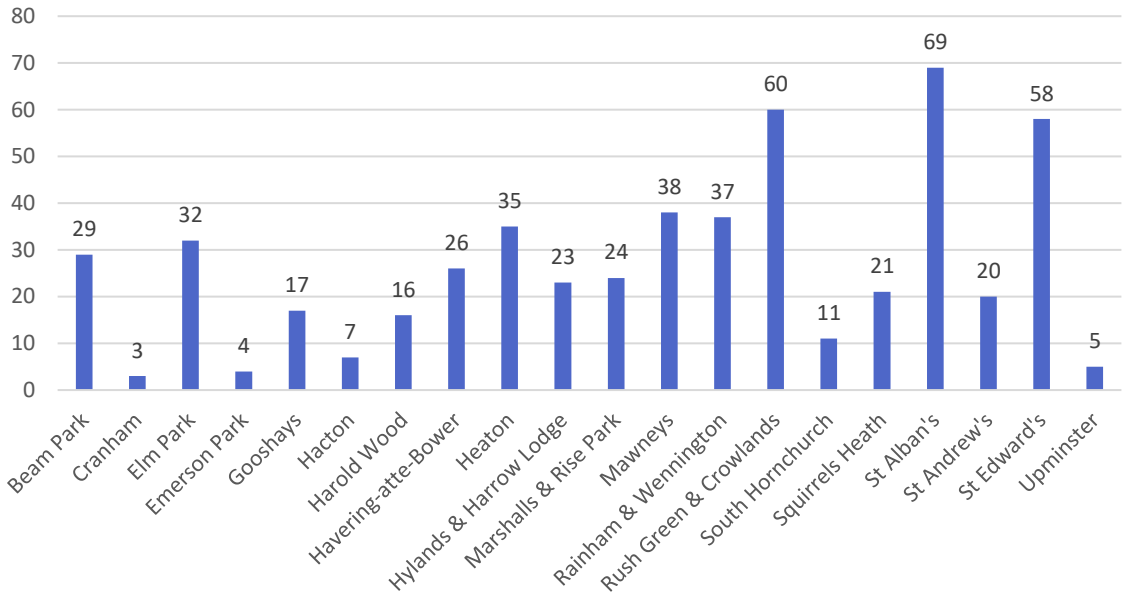
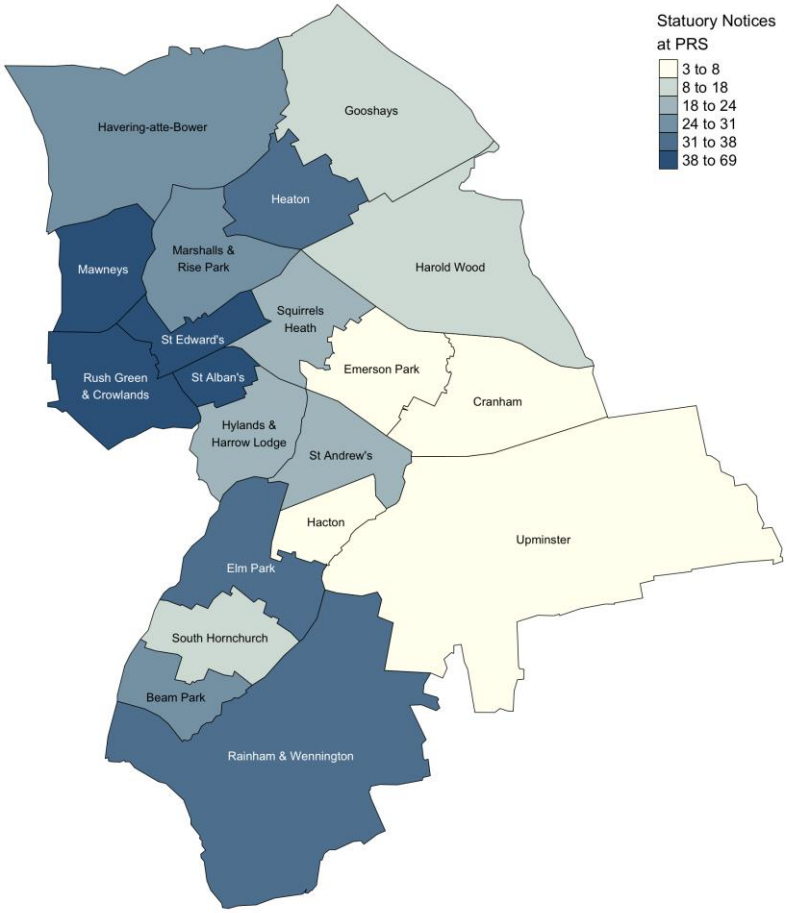


Figure 24. Statutory notices served on PRS properties (Source: Ti 2024).



Map 7. Statutory notices served on PRS properties (Source: Ti 2024, Map by Metastreet).

Enforcement includes using Housing Act and other public protection legislation to enforce standards and includes civil penalties and prosecutions. Over a 5-year period (2019-24), Havering issued 135 penalties and prosecutions to address housing offences (Figure 25 & Map 8).

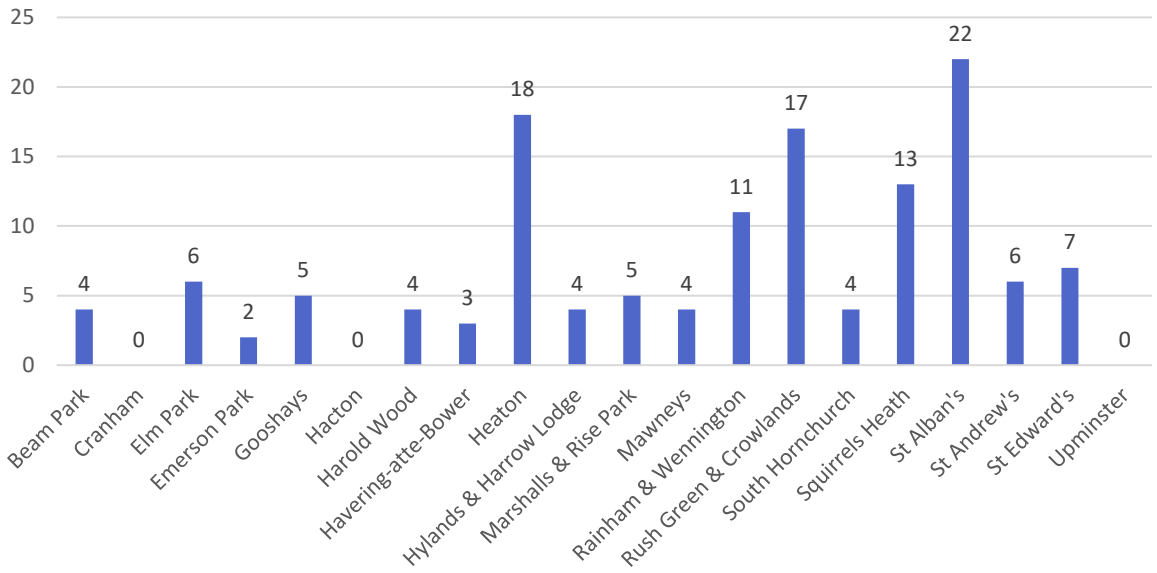
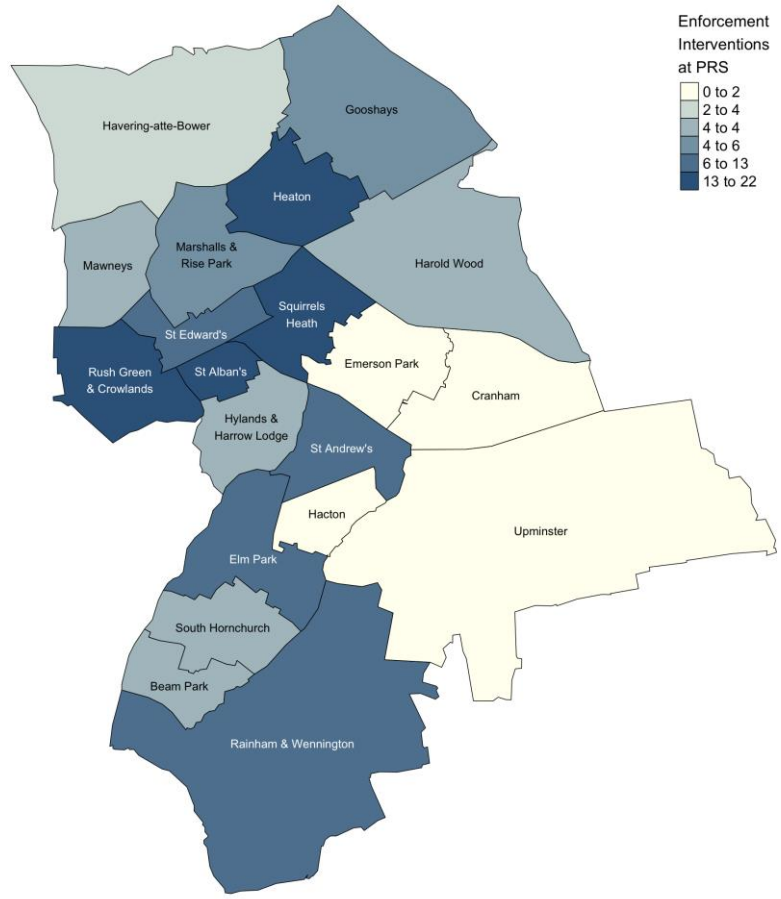


Figure 25. Enforcement interventions linked to PRS properties (Source: Ti 2024).



Map 8. Distribution of enforcement interventions linked to PRS properties (Source: Ti 2024, Map by Metastreet).

3.3 Results - Houses in Multiple Occupation (HMO)

For the purposes of this report, HMOs in Havering have been divided into two main groups, known HMOs (licensed by the authority under Part 2, Housing Act 2004,) and predicted HMOs (shared amenity HMOs with 3 or more occupants).

The known HMO group meet the following standards:

- Dwellings inhabited by either three (Additional) or five (Mandatory) or more occupiers, residing in two or more distinct households, and sharing common amenities like a kitchen or bathroom. This regulation applies irrespective of the number of floors.

The predicted HMO group are based on the following standard:

- Dwellings inhabited by three or more occupiers, residing in two or more distinct households, and sharing common amenities like a kitchen or bathroom. The property type is not considered.

3.3.1 Population and distribution

Havering 's HMO population is made up of known HMOs that share basic amenities (410) and predicted HMOs (454). The total HMO population in Havering is therefore calculated to be 864.

The HMO population is distributed across all wards. Rush Green & Crowlands (89) has the most HMOs (Figure 29 and Map 10).

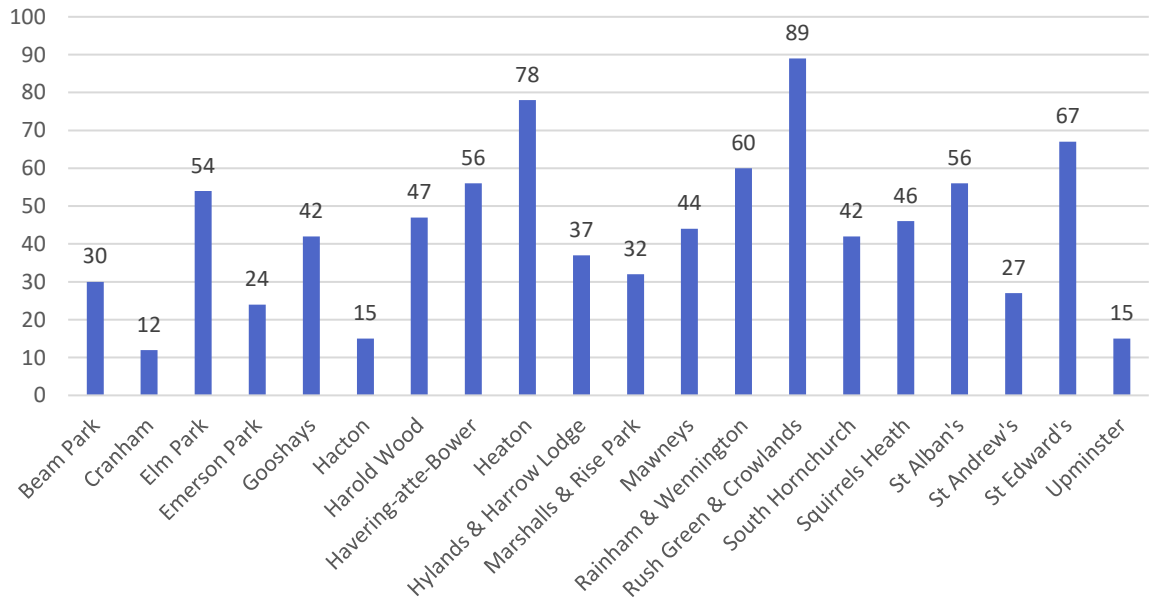
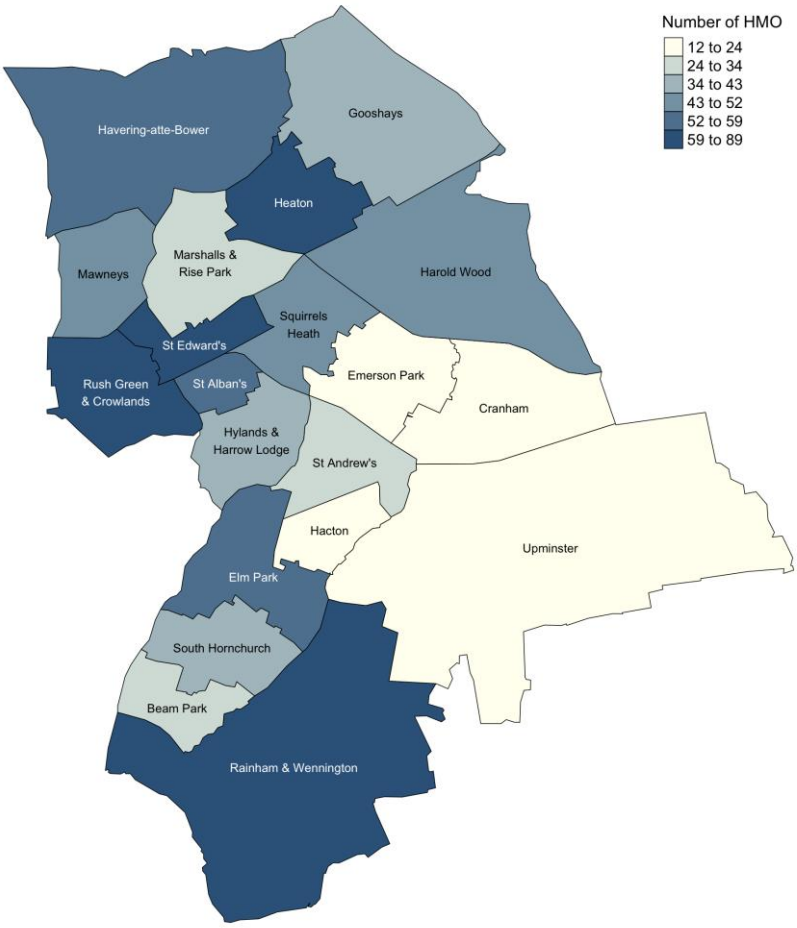


Figure 26. Number of HMOs by ward (known and predicted) (Source Ti 2024)



Map 9: Distribution of shared HMOs (known and predicted) (Source Ti 2024, map by Metastreet)

Shared HMOs tend to be the cheapest form of private housing available and have traditionally been occupied by single adults, however in recent years many more couples and children reside in HMOs. Pressure on affordable housing and homelessness has driven demand for this type of dwelling nationally [27].

HMOs are distributed across all wards; Heaton (49) has the most known HMOs (Figure 30).

[27] Regulating the Privately Rented Housing Sector, Evidence into Practice, Jill Stewart, Russell Moffatt (2022)

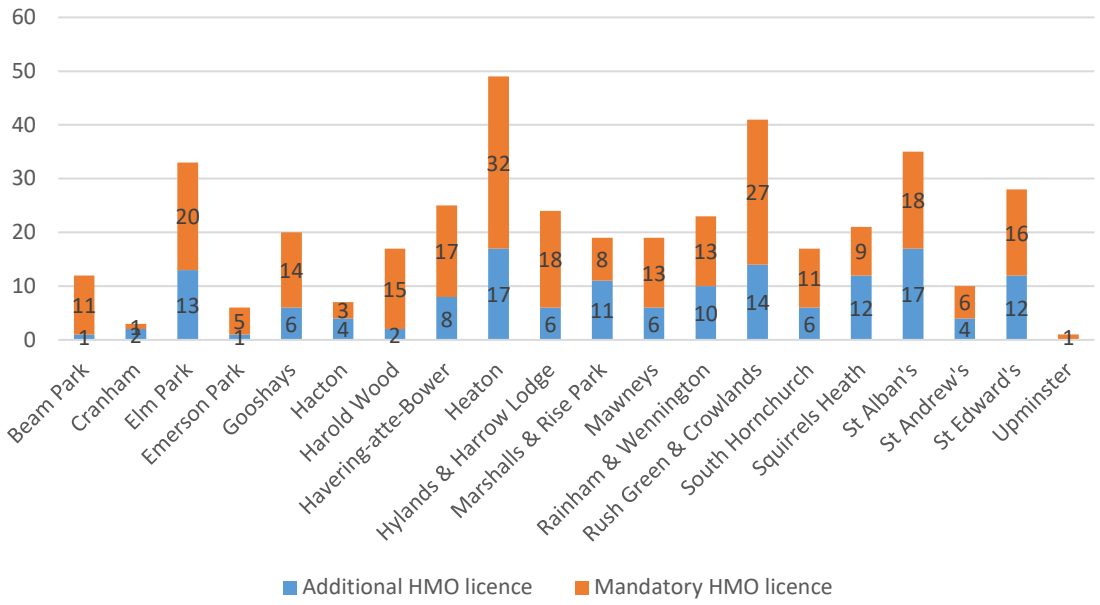


Figure 27. Number of known HMOs (Mandatory & Additional) by ward (Source Ti 2024).

Predicted HMOs are distributed across all wards; Rush Green& Crowlands (48) has most predicted HMOs (Figure 31).

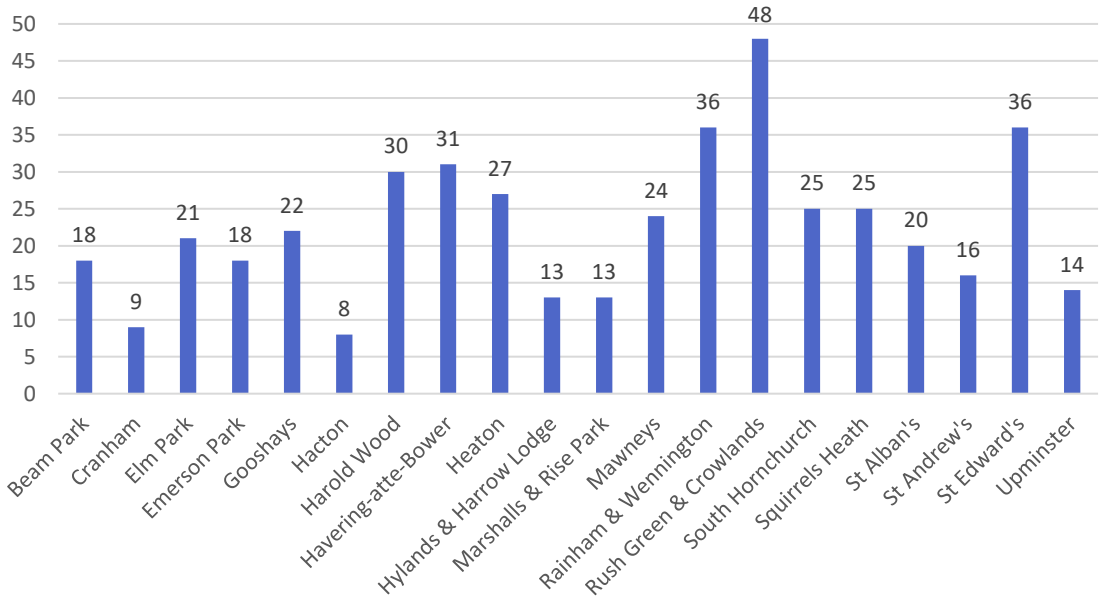


Figure 28. Number of predicted HMOs (shared amenities) by ward (Source Ti 2024).

3.3.2 HMO & housing conditions

Proper management of HMOs is necessary to safeguard the tenants and the wider community. The HMO Management Regulations require the manager to keep all parts of the HMO safe, clean and well maintained. They also place a duty on tenants of HMOs to cooperate with the manager and not damage any fire safety equipment [28].

Using a sample of properties that are known to have at least one serious housing hazard, it is possible to predict the number of HMOs (known & predicted) with at least one serious hazard (Category 1 and high scoring Category 2, HHSRS A-D) across the borough. Further details of the methodology can be found in Appendix 2.

Analysis shows that 426 of 864 shared amenities HMOs (known and predicted) in Havering are predicted to have at least one serious hazard. The number of Category 1 and high scoring Category 2, (HHSRS A-D) hazards is highest in Rush Green & Crowlands (41) (Figure 32 & Map 11). All wards have HMOs with predicted hazards.

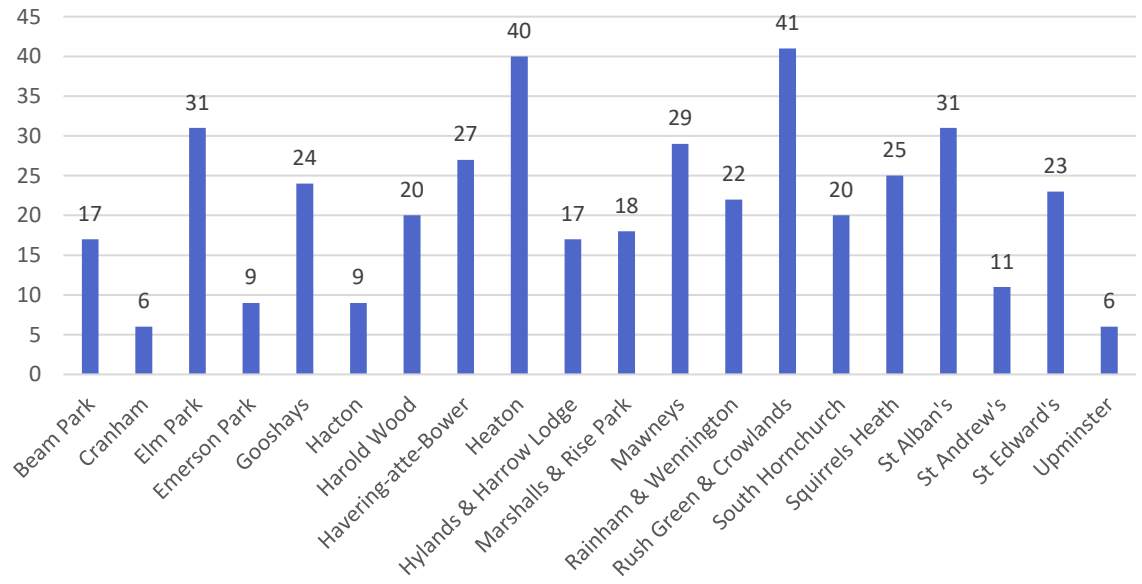
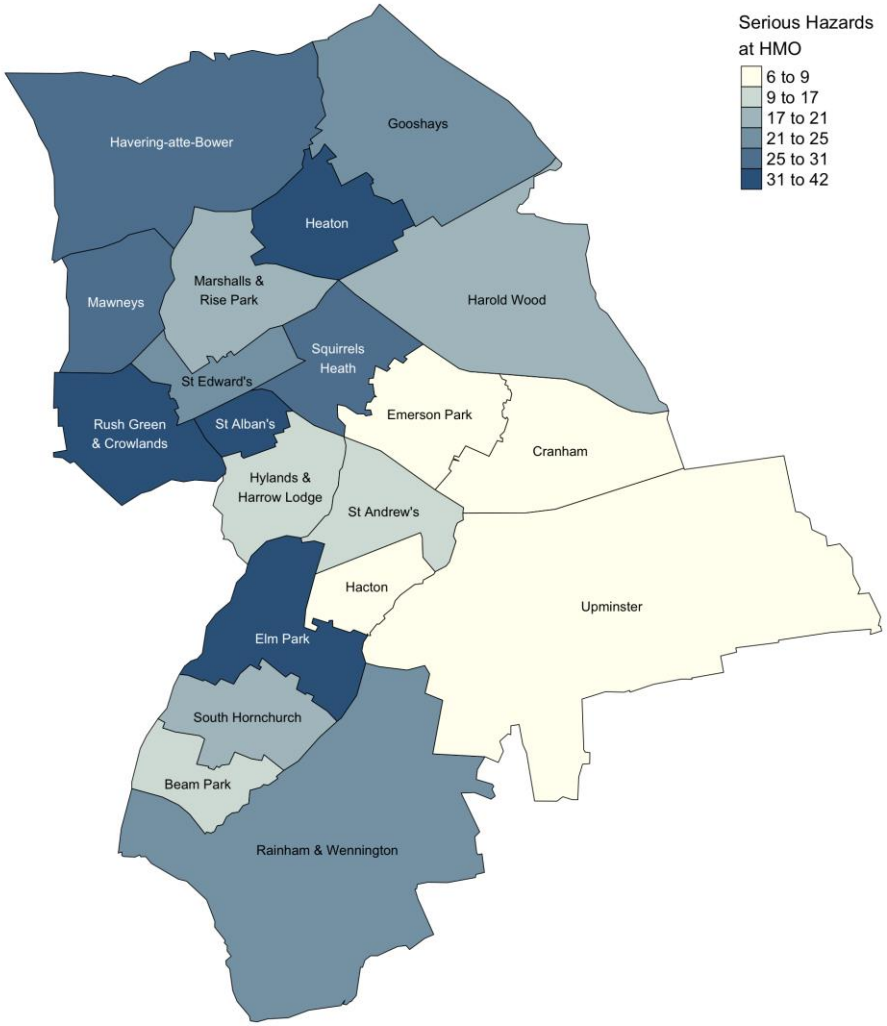


Figure 29. Number of HMO (known and predicted) with Category 1 and high scoring Category 2, (HHSRS A-D) by ward (Source Ti 2024).

[28] The Management of Houses in Multiple Occupation (England) Regulations 2006 (https://www.legislation.gov.uk/uksi/2006/372/contents/made)



Map 10: Distribution of HMO (known and predicted) with Category 1 and high scoring Category 2, (HHSRS A-D) by ward (Source Ti 2024, map by Metastreet).

Complaints made by tenants and others to Havering Council regarding poor property conditions, inadequate property management are a direct indicator of low quality and poorly managed HMOs. Havering recorded 240 complaints from tenants and others linked to 172 HMOs over a 5-year period (April 2019 – March 2024). Elm Park (29) and Mawneys (28) have the highest number of tenant and other complaints linked to HMO (Figure 33 and Map 12).

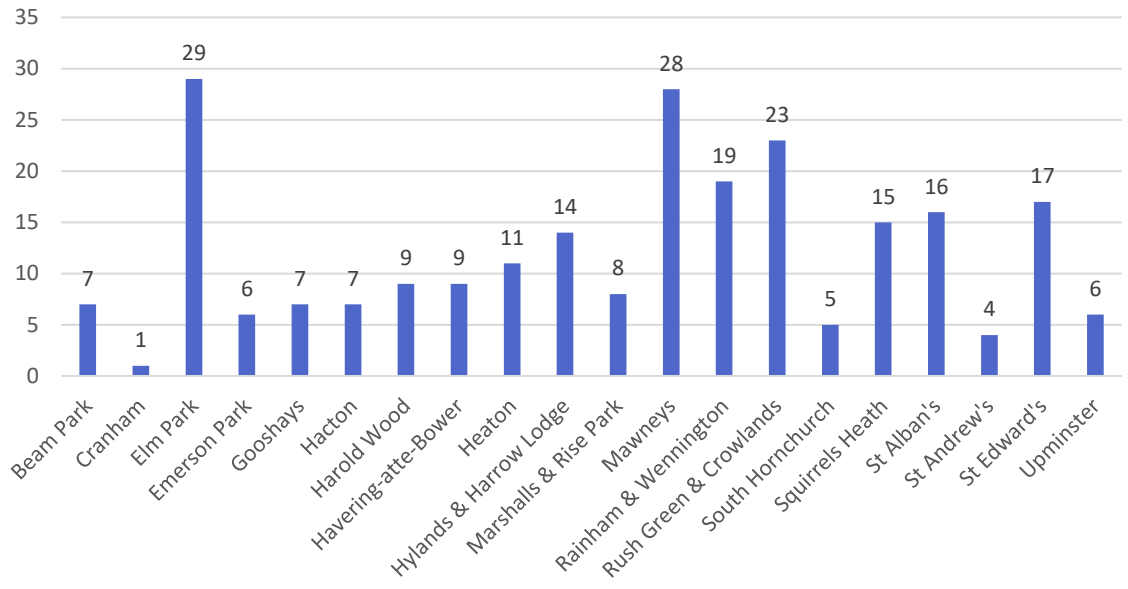
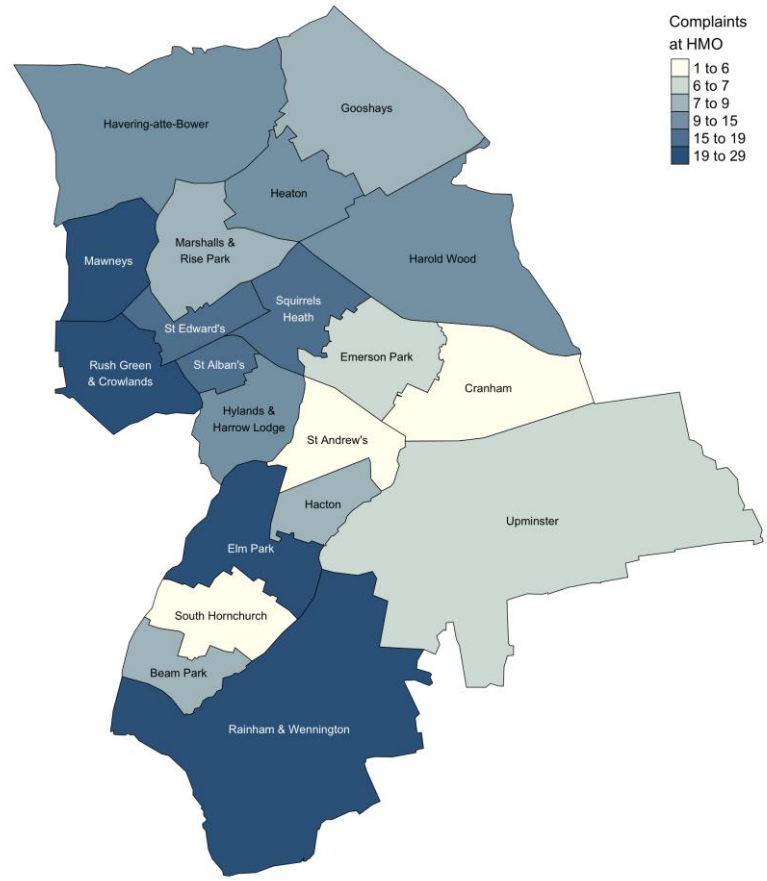


Figure 30. Number of tenant and other complaints linked to HMO by ward (Source Ti 2024)



Map 11: Distribution of tenant and other complaints linked to HMO by ward (Source Ti 2024, map by Metastreet).

3.3.3 HMO inspection results

Havering has an active HMO inspection programme. Between 2021-2024 Havering officers undertook 323 HMO property inspections.

The Housing Health and Safety Rating System (HHSRS) is a system for assessing housing conditions. A hazard is any risk of harm to the health or safety of an actual or potential occupier of accommodation that arises from a deficiency in the dwelling, building or land in the vicinity.

During officer HMO inspections, 1254 hazards (Category 1 & 2, HHSRS) were identified across 139 properties. Therefore 43% of HMOs inspected were found to have at least 1 hazard (Category 1 & 2, HHSRS).

Hazards identified during officer inspections are distributed across all wards, except Upminster. Heaton (257) and Havering-atte-Bower (115) have the highest number of HMO identified hazards (Figure 34).

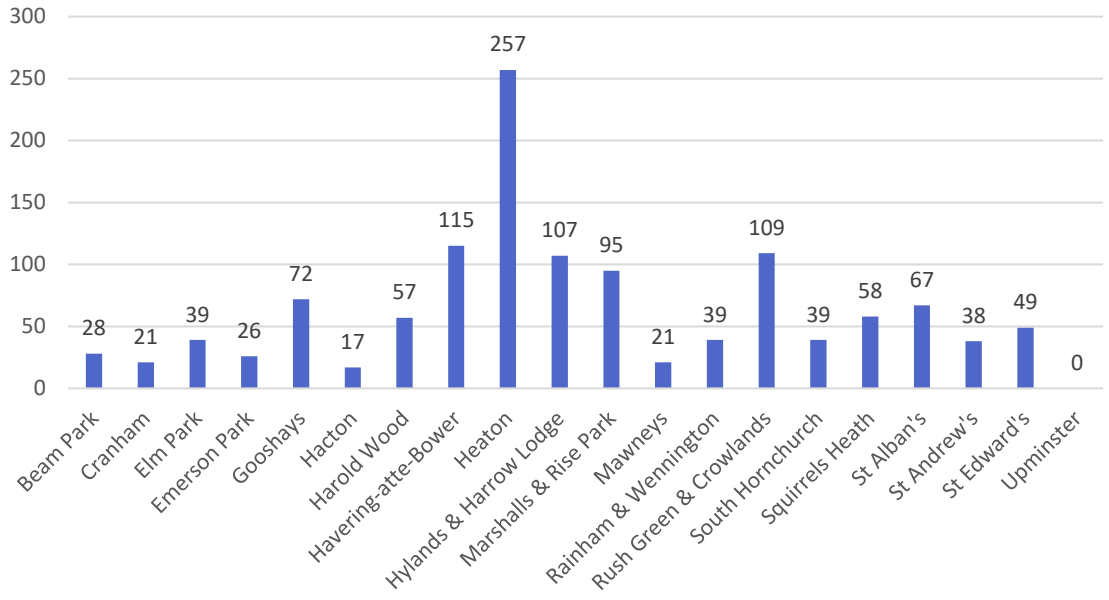
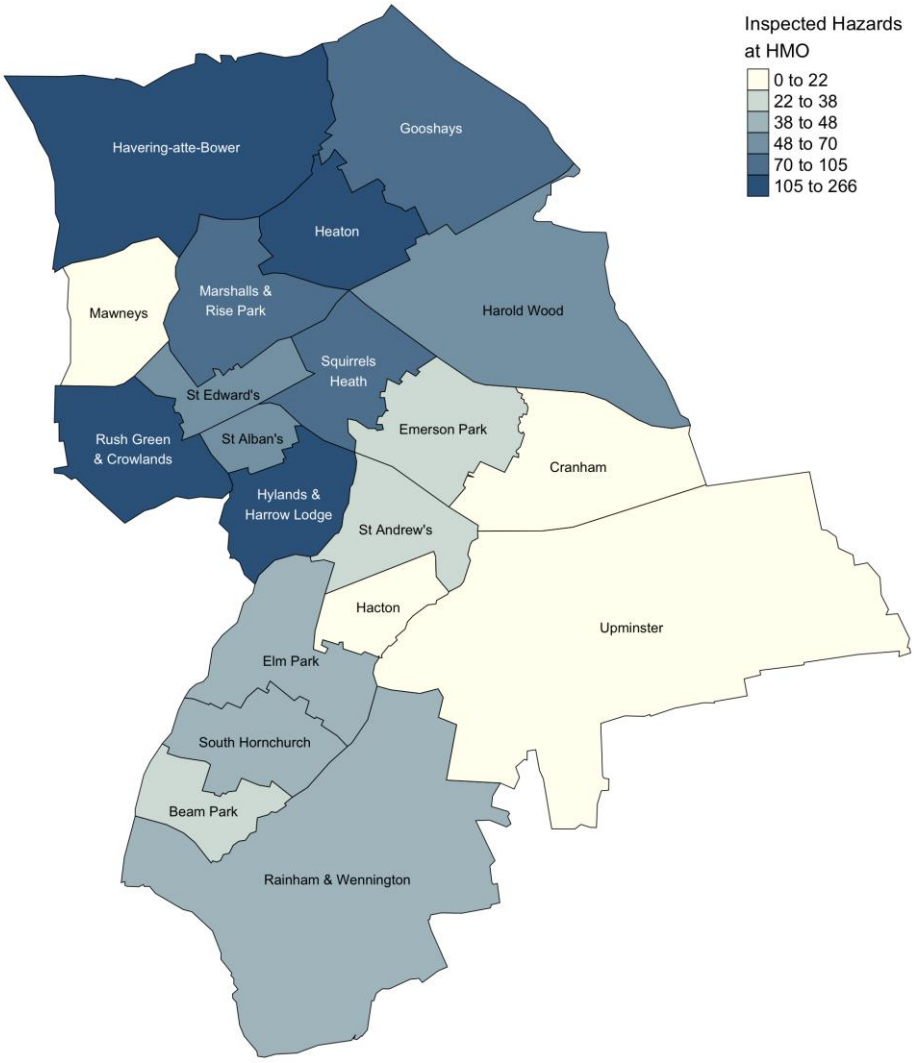


Figure 31. Hazards identified during inspections (2021-2024) (HMO) by ward (Source: TI 2024).

Identified hazard are distributed across most of the borough. Concentrations of identified hazards are predominantly from the northern wards (Map 8).



Map 12. Hazards identified during inspections (2021-2024) (HMO) (Source: TI 2024, Map by Metastreet).

3.3.4 HMO enforcement and regulation interventions

Havering uses a range of statutory housing and public health notices to address poor housing standards in the PRS. Interventions can be a result of a complaint being made by a tenant about their accommodation or as a result of a proactive inspection. Over a 5-year period (2019-24) Havering served 167 housing and public health notices (Figure 35). St. Alban's (18) received the largest number of statutory notices.

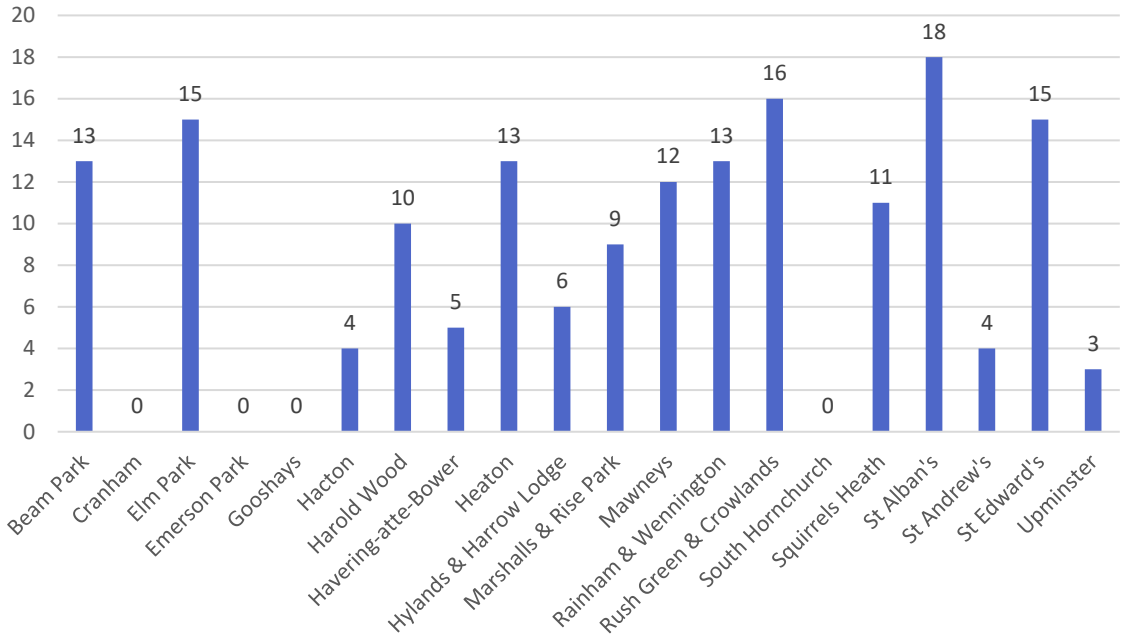


Figure 32. Statutory notices served on HMO properties (Source: Ti 2024).

Enforcement includes using Housing Act and other public protection legislation to enforce standards and includes civil penalties and prosecutions. Over a 5-year period (2019-24) Havering officers undertook 89 enforcement interventions. St. Alban's (14) had the largest number of enforcement cases.

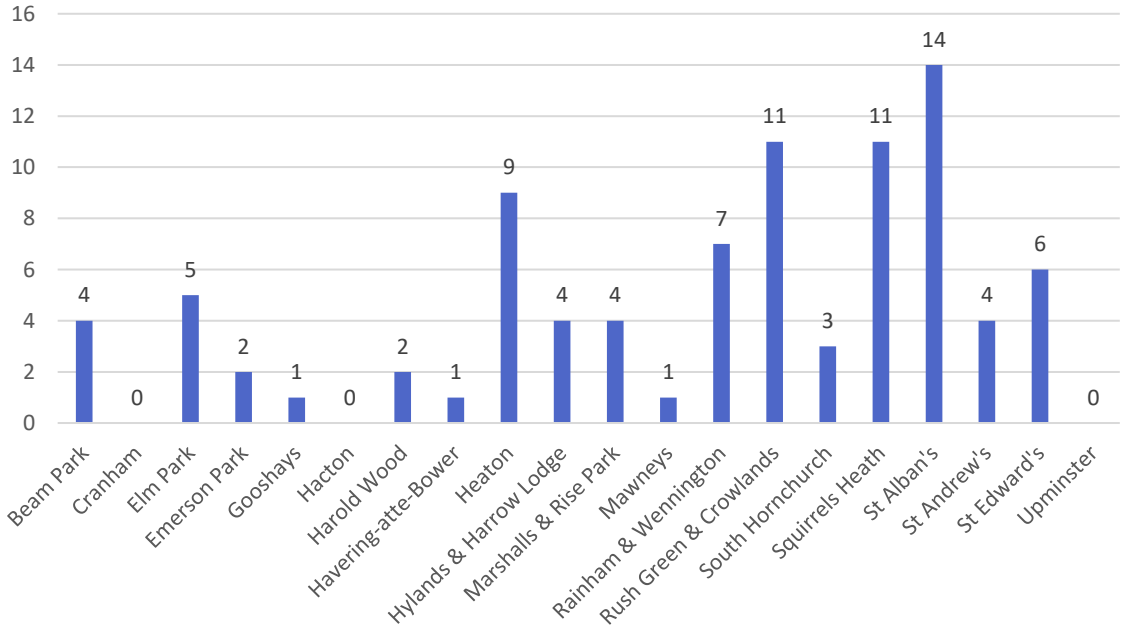
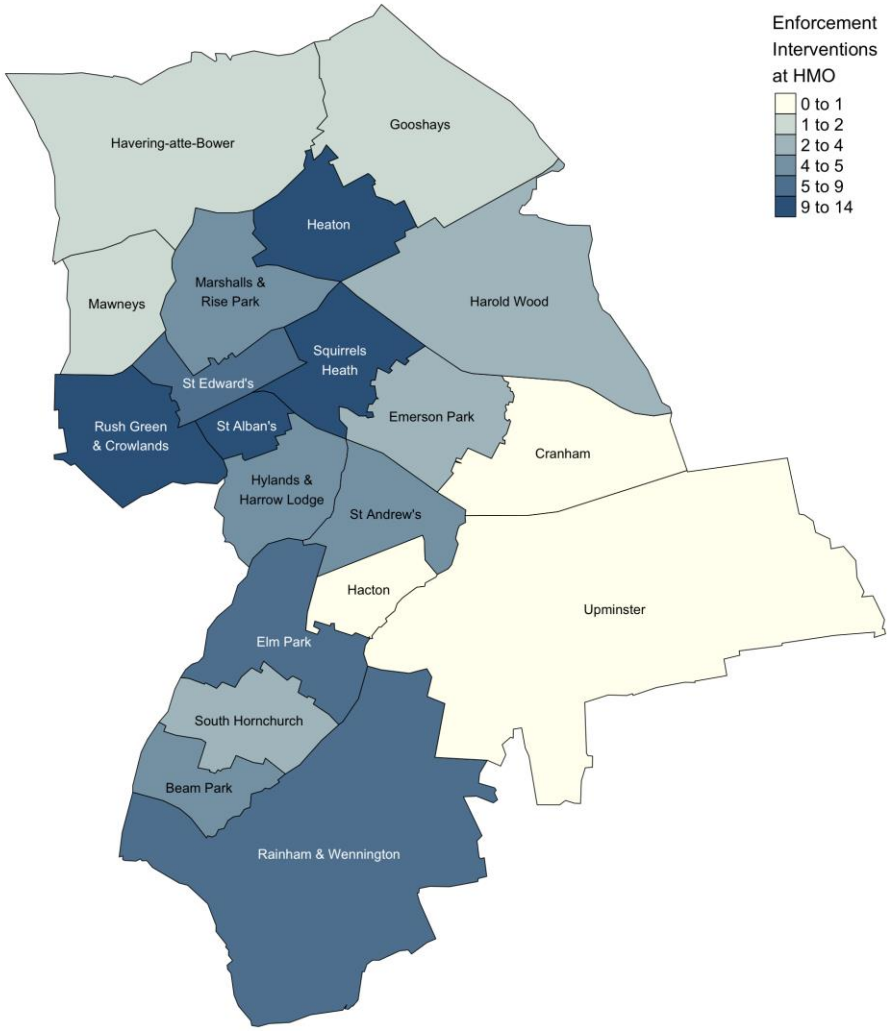


Figure 33. Enforcement interventions linked to HMOs properties (Source: Ti 2024).



Map 13. Distribution of enforcement interventions linked to HMOs (Source: Ti 2024, Map by Metastreet).

4 Conclusions

The private rented sector (PRS) in Havering has experienced significant growth since 2011. According to 2024 tenure modelling, the PRS now represents 19.3% of the borough's housing stock (Figure 10). This increase aligns with long-term national and regional trends (Figure 11).

PRS properties are distributed across all 20 wards (Figure 12). The number of dwellings per ward ranges from 2,235 in Rush Green & Crowlands to 387 in Emerson Park. The proportion of PRS properties varies between 44.6% in St. Alban's and 9.1% in Cranham (Figure 13 & Table 2). Notably, 7 out of 20 wards have a PRS percentage equal to or above the 2024 national average (19%).

Havering exhibits a mix of deprivation levels across wards, with four wards ranking below decile 5 in aggregated Index of Multiple Deprivation (IMD) scores (Figure 4 & Map 1). The borough recorded 155 landlord possession claims in Q4 2023, below the London average of 212 (Figure 6). Additionally, Havering's average rent of £1,250 is below the London average (£1,625) but above the national average (£825) (Figure 7).

Residential burglary rates in Havering (4.7 per 1,000 residents) are lower than the London borough average (6.4 per 1,000) for 2022-23. With 859 burglaries reported between January and December 2023, Havering ranks 24th among London boroughs (Figure 8). Heaton (104) and Gooshays (90) wards reported the highest burglary numbers (Figure 9).

The PRS in Havering is dominated by houses (47%), with bungalows being the least common property type (4%) (Figure 15). Approximately 5,058 PRS properties are estimated to have at least one serious housing hazard (Category 1 and high-scoring Category 2 under HHSRS). These hazards are distributed across all wards, with the highest numbers in St. Alban's (452) and Rush Green & Crowlands (432) (Figure 16 & Map 4).

The rate of PRS properties with serious hazards varies significantly across wards. Mawneys has the highest rate at 29.5 per 100 properties, compared to the national PRS average of 12% (Figure 17).

Havering maintains an active property inspection programme. Between 2021 and 2024, officers conducted 388 inspections, identifying 1,298 hazards across 150 properties, with 38.6% of inspected properties containing at least one hazard (Figure 18). Hazards were identified in all wards except Upminster, with Heaton (257) and Havering-atte-Bower (155) reporting the most.

Over five years, Havering received 1,459 complaints and service requests from PRS tenants regarding poor property conditions and management, linked to 1,208 properties. Rush Green & Crowlands (171) and St. Alban's (150) reported the most complaints (Figure 19 & Map 6).

Energy efficiency remains a concern, with 2,399 PRS properties holding EPC ratings of E, F, or G—the least energy-efficient categories. St. Alban's has the highest concentration of these properties (225) (Figures 21 & 22).

To address substandard housing, Havering issued 535 housing and public health notices between 2019 and 2024 (Figure 24 & Map 7). St. Alban's received the most notices (69). Over the same period, the borough issued 135 penalties and prosecutions for housing offences (Figure 25 & Map 8).

Houses in Multiple Occupation (HMOs)

Havering's HMO stock includes 410 licensed HMOs (under Part 2 of the Housing Act 2004) and 454 predicted shared amenity HMOs, totalling 864 properties. HMOs are distributed across all wards, with Rush Green & Crowlands having the highest number (89) (Figure 29 & Map 10).

Of these, 426 HMOs are predicted to have at least one serious hazard (Category 1 or high-scoring Category 2). All wards contain HMOs with predicted hazards, with the highest concentration in Rush Green & Crowlands (41) (Figure 32 & Map 11).

From April 2019 to March 2024, 240 complaints related to 172 HMOs were recorded. Elm Park (29) and Mawneys (28) reported the most complaints (Figure 33 & Map 12).

Havering also actively inspects HMOs, with 323 inspections conducted between 2021 and 2024. These inspections identified 1,254 hazards across 139 properties, with 43% of inspected HMOs found to have at least one hazard. Hazards were distributed across all wards except Upminster, with Heaton (257) and Havering-atte-Bower (115) having the most (Figure 34).

During the same period, Havering carried out 89 HMO enforcement interventions. St. Alban's accounted for the highest number of enforcement actions (14).

Key challenges include a high prevalence of serious housing hazards (5,058 PRS properties and 426 HMOs), substandard energy efficiency (2,399 PRS properties with EPC ratings E, F, or G), and persistent tenant complaints about property conditions and management. Despite this, Havering has a proactive inspection and enforcement programme, addressing poor standards through statutory notices, penalties, and prosecutions.

With below-average rents, low landlord possession claims, and a relatively low residential burglary rate, Havering's PRS offers some advantages. However, ongoing focus on hazard reduction, energy efficiency, and enforcement will be essential to ensure safe and sustainable private rental housing across the borough.

Appendix 1 – Ward summaries

Table 3. Ward PRS summary (Source Ti 2024)

Ward	PRS dwellings	% PRS	Dwellings with hazards
Beam Park	758	22.3	123
Cranham	494	9.1	100
Elm Park	1,108	16.8	307
Emerson Park	387	10.9	94
Gooshays	1,018	14.7	257
Hacton	499	12.5	108
Harold Wood	1,241	20.7	275
Havering-atte-Bower	979	15.9	247
Heaton	1,153	16.4	283
Hylands & Harrow Lodge	899	15.4	209
Marshalls & Rise Park	765	14.6	204
Mawneys	1,006	17.4	297
Rainham & Wennington	1,301	23.8	349
Rush Green & Crowlands	2,235	35.6	432
South Hornchurch	643	16.2	181
Squirrels Heath	1,366	20.1	337
St Alban's	1,625	44.6	452
St Andrew's	1,093	16.8	268
St Edward's	1,948	38.4	403
Upminster	564	10.4	132

Table 4. Ward HMO (known and predicted) summary (Source Ti 2024)

Ward	No. HMOs	HMOs with hazards	Complaints
Beam Park	30	17	7
Cranham	12	6	1
Elm Park	54	31	29
Emerson Park	24	9	6
Gooshays	42	24	7
Hacton	15	9	7
Harold Wood	47	20	9
Havering-atte-Bower	56	27	9
Heaton	76	40	11
Hylands & Harrow Lodge	37	17	14
Marshalls & Rise Park	32	18	8
Mawneys	43	29	28
Rainham & Wennington	59	22	19
Rush Green & Crowlands	89	41	23
South Hornchurch	42	20	5

Squirrels Heath	46	25	15
St Alban's	55	31	16
St Andrew's	26	11	4
St Edward's	64	23	16
Upminster	15	6	6

Appendix 2 - Tenure Intelligence (Ti) – stock modelling method

This Appendix explains at a summary level Metastreet's Tenure Intelligence (Ti) method (Figure 34).

Ti uses big data and machine learning in combination with expert housing knowledge to accurately predict a defined outcome at the property level.

Council and external data have been assembled as set out in Metastreet's data specification to create a property data warehouse comprising millions of cells of data.

Machine learning is used to make predictions of defined outcomes for each residential property, using known outcome data provided by the council.

Results are analysed by skilled practitioners to produce a summary of housing stock, predictions of levels of property hazards and other property stressors. The results of the analysis can be found in the report findings chapter.

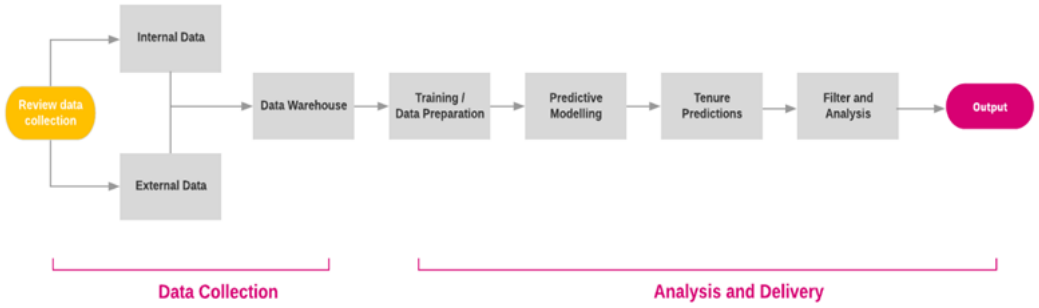


Figure 34. Summary of Metastreet Tenure Intelligence method.

Methodology

Metastreet has worked with London Borough of Havering to create a residential property data warehouse based on a detailed specification. This has included linking millions of cells of data to 109,048unique property references, including council and externally sourced data. All longitudinal data requested from council departments is 5 consecutive years, from April 2019 – March 2024

Once the property data warehouse was created, the Ti model was used to predict tenure and stock condition using the method outlined below.

Machine learning was utilised to develop predictive models using training data provided by the council. Predictive models were tested against all residential properties to calculate risk scores for each outcome. Scores were integrated back into the property data warehouse for analysis.

Many combinations of risk factors were systematically analysed for their predictive power using logistic regression. Risk factors that duplicated other risk factors but were weaker in their predictive effect were eliminated. Risk factors with low data volume or higher error are also eliminated. Risk factors that were not statistically significant are excluded through the same processes of elimination. The top 5 risk factors for each model have the strongest predictive combination.

Four predictive models have been developed as part of this project. Each model is unique to Havering , they include:

- Owner occupiers
- Private rented sector (PRS)
- Houses in Multiple Occupation (HMO)
- PRS housing hazards (HHSRS, Category 1 and high scoring Category 2 A-D).

Using a D^2 constant calculation it is possible to measure the theoretical quality of the model fit to the training data sample. This calculation has been completed for each model. The D^2 is a measure of "predictive capacity", with higher values indicating a better model.

Based on the modelling each residential property is allocated a probability score between 0-1. A probability score of 0 indicates a strong likelihood that the property tenure type is *not* present, whilst a score of 1 indicates a strong likelihood the tenure type *is* present.

Predictive scores are used in combination to sort, organise and allocate each property to one of 3 categories described above. Practitioner skill and experience with the data and subject matter is used to achieve the most accurate tenure split.

It is important to note that this approach cannot be 100% accurate as all large data models include error for a range of reasons. The D^2 value is one measure of model "effectiveness". The true test of predictions is field trials by the private housing service. However, error is kept a low as is possible through detailed post analysis filtering and validation.

A continuous process of field testing and model development is the most effective way to develop accurate tenure predictions.

The following tables include detail of each selected risk factors for each model. Results of the null hypothesis test are also presented as shown by the Pr(>Chi) results. Values of <0.05 are generally considered to be statistically significant. All the models show values much smaller, indicating much stronger significance.

Owner occupier model

The owner occupier model shows each of the 5 model terms to be statistically significant, with the overall model showing a "predictive capacity" of around 75% (Table 5).

Table 5. Owner occupier predictive factors.

Risk factors selected	Pr (>Chi)*
CTAX.Count.of.Accounts.Over.Last.3.Years	2.2e-16
ER.Count.of.Current.Names	2.2e-16
ONS.Output.Area.Supergroup.Description	0.0001708
CTAX.Current.Balance.RealArrears.All.Accounts	2.2e-16
Environment.Total.Count	2.2e-16
Training data, n= 2001	
D^2 test = 0.75**	

* Pr(>Chi) = Probability value/null hypothesis test, ** D^2 test = Measure of model fit

PRS predictive model

The PRS model shows that each of the 5 model terms is statistically significant, with the overall model having a "predictive capacity" of around 78% (Table 6).

Table 6. PRS predictive factors.

Risk factors selected	Pr(>Chi)
CTAX.Count.of.Accounts.Over.Last.3.Years	2.2e-16
Benefits.Count.of.Current.Claims.Over.Last.3.Years	2.2e-16
Environment.Count	1.122e-09
TDS	2.2e-16
CTAX.Current.Balance.RealArrears.All.Accounts	2.2e-16
Training data, n= 2001	
D^2 test = 0.78	

Category 1 (HHSRS) hazards model

Numerous properties where the local housing authority has recently taken action to address serious hazards were sampled for training data. Specifically, this included Housing Act 2004 Notices served on properties to address Category 1 hazards. It's important to note that due to the complex risk-based approach to HHSRS scoring model and assessment, predictions are likely to include both properties with Category 1 hazards and properties with high scoring Category 2 hazards. It is

reasonable to conclude that properties identified are likely to include hazards that would be scored A-D, using HHSRS scoring matrix and therefore be considered serious. The model results show that each of the model terms is statistically significant, with the overall model having a "predictive capacity" of around 66% (Table 7).

Table 7. Hazard (HHSRS) predictive factors.

Risk factors selected	**Pr (>Chi)**
Environment.Count	0.01561
CRM.Incidents.Landlord.Indicators.Last.3.Years.Count	0.04304
TDS	2.2e-16
Current _rating	2.2e-16
Benefits.Count.of.Current.Claims.Over.Last.3.Years	8.919e-07
Training data, n= 1069	
D^2 test = 0.66	

HMO (House in Multiple Occupation) model

This model predicts the likelihood that a UPRN will be an HMO (Table 8). Each of the 5 model terms is statistically significant and the overall model has a "predictive capacity" of around 60%.

Table 8. HMO predictive factors.

Risk factors selected	**Pr (>Chi)**
CTAX.Total.Surnames.Over.Last.3.Years	1.700e-10
Environment. Count	2.2e-16
Environment.Total.Count	2.2e-16
Benefits.Type	6.927e-10
CTAX.Current.Balance.Liabilities.Open.Accounts	2.321e-08
Training data, n= 1069	
D2 test = 0.60	

Ti 2024 – Census 2021 data comparison

Table 9. . Ti dwelling data compared to Census household data.

	Ti 2024		**Census 2021**	
Havering 2024	2019 –2024		21-Mar-21	
Tenure	No. dwellings	%	No. households	%
Social Housing	17,211	12.7%	13,807	13.6%
Owner occupiers	70,755	65.4%	71,355	70.5%
PRS	21,082	19.3%	16,114	15.9%
ToT	**109,048**		**101,276**	

Metastreet Ltd

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London

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PUBLIC NOTICE

LONDON BOROUGH OF HAVERING

COUNCIL DESIGNATION OF AN AREA FOR ADDITIONAL HMO LICENSING

Section 56 and 58, Housing Act 2004

On 18th December 2025 in the exercise of its powers under section 56 and 58 of the Housing Act 2004 ("the 2004 Act"), London Borough of Havering Council ("the Council") of Town Hall, Main Road, Romford, RM1 3BB made the London Borough of Havering Designation for Additional Licensing of Houses in Multiple Occupation No.2 2026 ("the Designation").

The Designation

The Designation will come into force on 18th March 2026 (not less than 3 months after decision date) and unless previously revoked, shall cease to have effect on 17th March 2031. The Designation applies to the area outlined in red on the map at Annex A below.

The Designation applies accordingly to all wards in the London Borough of Havering.

The Designation applies to any building or part of a building in the Designation area if (a) it is occupied by three or more persons living in two or more households, (b) it satisfies the standard test, the self-contained flat test, or the converted building test, as defined by section 254 of the 2004 Act (see Annex B below), or a HMO declaration has been made in respect of it, pursuant to sections 254(1)(d) and 255 of the 2004 Act (see Annex B below), and (c) it does not fall within a description of buildings, or parts of buildings, that either (i) are not HMOs for the purposes of additional licensing under Part 2 of the 2004 Act (see Annex C below) or (ii) require a licence under section 55(2)(a) of the 2004 Act, as prescribed by Article 4 of the Licensing of Houses in Multiple (Prescribed Description) (England) Order 2018 (see Annex D below).1 The Designation will not apply to HMOs as defined by section 257 of the 2004 Act, i.e. certain converted blocks of flats (see Annex B below).

HMOs requiring a licence and statutory exceptions

Every HMO to which the Designation applies (above) must be licensed under Part 2 (S.61) of the 2004 Act unless either (a) a temporary exemption notice is in force in relation to it under section 62 of the 2004 Act, or (b) an interim or final management order is in force in relation to it under Chapter 1 of Part 4 to the 2004 Act.2 The London Borough of Newham will comply with the notification requirements contained in section 59 of the Act and shall maintain a register of all houses registered under this designation, as required under section 232 of the Act.3

Consequences of failing to license an HMO, comply with licence conditions etc.

Unless a statutory exception applies, as set out above, the HMO will require a licence under Part 2 of the 2004 Act. A person who manages or has control of it without a licence will commit an offence under section 72(1) of the 2004 Act, and will be liable upon summary conviction or penalty to an unlimited fine or, as the case may be, a financial penalty not exceeding £30,000 per offence. A person who breaches a condition of a licence, or who knowingly allows an HMO to be occupied by more than the number of persons or households permitted by the licence, will be similarly liable.

The landlord of such a property may also be liable to a rent repayment order under the Housing and Planning Act 2016, or in certain circumstances to entry on a database of rogue landlords, or to a banning order.

Inspecting the designation

The Designation may be inspected by prior appointment between 9.00 and 17:00 on weekdays at: London Borough of Havering, Town Hall, Main Road, Romford, RM1 3BB

Important notice:

Where to obtain advice If you are an owner, a landlord, an agent, or a person otherwise managing or occupying a property in the Designation area you are strongly advised to seek advice from the Council about the need to license the property. If you wish to do this or you require a licence application or general advice about the Designation you are advised to contact:

(insert details)

Dated

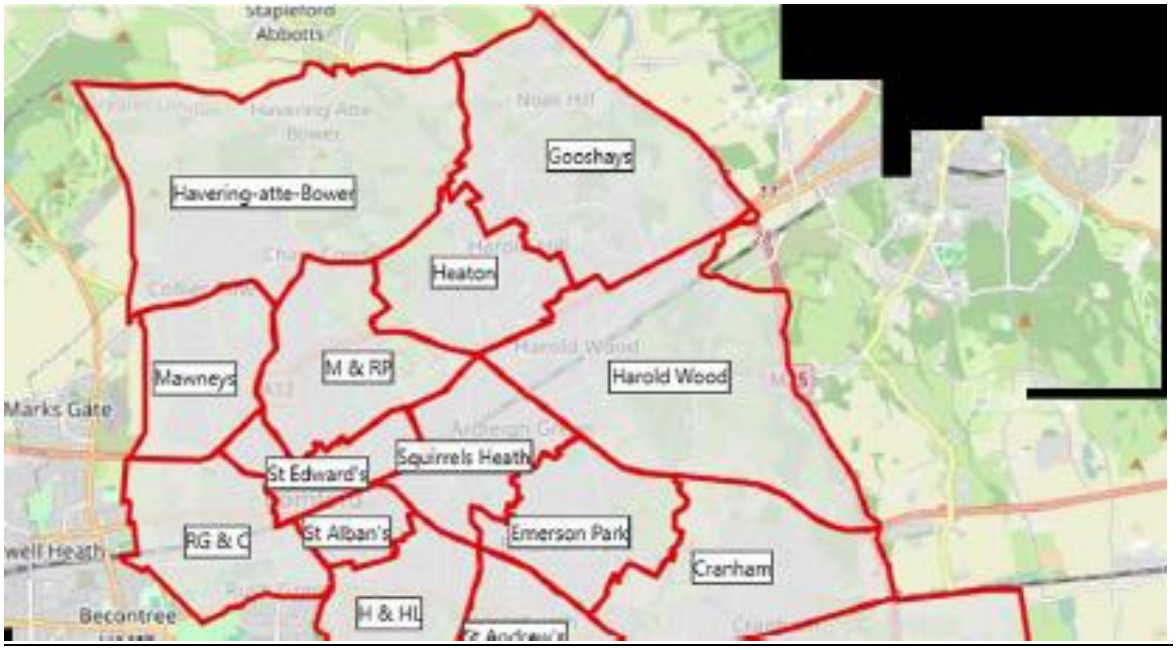
Signed

Helen Oakerbee

Director of Planning and Environmental Services

ANNEX A- Map of wards included in the Designation

(Please see attached Map on Page 1 of the PDF which is a clearer copy – this will be inserted into the final Designation before publication).



ANNEX B – Paragraph 5: HMOs subject to the designation:

1. For the purposes of the designation a building or part of a building is a – house in multiple occupation if:

a) it meets the conditions in subsection (2) (-the standard test);

b)it meets the conditions in subsection (3) (-the self contained flat test);

c)it meets the conditions in subsection (4) (-the converted building test);

d)an HMO declaration is in force in respect of it under section 255 of the Act; or

e)it is a converted block of flats to which section 257 of the Act applies.

2. A building or a part of a building meets the standard test if—

a) it consists of one or more units of living accommodation not consisting of a self-contained flat or flats;

b) the living accommodation is occupied by persons who do not form a single household (see section 258 of the Act);

c) the living accommodation is occupied by those persons as their only or main residence or they are to be treated as so occupying it (see section 259 of the Act);

d) their occupation of the living accommodation constitutes the only use of that accommodation;

e) rents are payable or other consideration is to be provided in respect of at least one of those persons' occupation of the living accommodation; and

f) two or more of the households who occupy the living accommodation share one or more basic amenities or the living accommodation is lacking in one or more basic amenities.

3. A part of a building meets the self-contained flat test if—

a) it consists of a self-contained flat; and

b) paragraphs (b) to (f) of subsection (2) apply (reading references to the living accommodation concerned as references to the flat).

4. A building or a part of a building meets the converted building test if—

a) it is a converted building;

b) it contains one or more units of living accommodation that do not consist of a self-contained flat or flats (whether or not it also contains any such flat or flats);

c) the living accommodation is occupied by persons who do not form a single household (see section 258 of the Act);

d) the living accommodation is occupied by those persons as their only or main residence or they are to be treated as so occupying it (see section 259 of the Act);

e) their occupation of the living accommodation constitutes the only use of that accommodation; and

f) rents are payable or other consideration is to be provided in respect of at least one of those persons' occupation of the living accommodation.

5. But for any purposes of the designation a building or part of a building within subsection (1) is not a house in multiple occupation if listed in Annex C below. References to an HMO include (where the context permits) any yard, garden, outhouses, outbuildings and appurtenances belonging to, or usually enjoyed with, it (or any part of it).

In Annex B –

Basic amenities mean -

a) a toilet,

b) personal washing facilities, or

c) cooking facilities;

- Converted building means a building or part of a building consisting of living accommodation in which one or more units of such accommodation have been created since the building or part was constructed
- Enactment includes an enactment comprised in subordinate legislation (within the meaning of section 21 of the Interpretation Act 1978);
- Self-contained flat means a separate set of premises (whether or not on the same floor)

    a) which forms part of a building;
    b) either the whole or a material part of which lies above or below some other part of the building; and
    c) c) in which all three basic amenities are available for the exclusive use of its occupants

ANNEX C-

Paragraph 5 (a) Buildings that are not HMOs for the purpose of the Act

Buildings controlled or managed by public bodies etc5 1. A building where the person managing or having control of it is6 : a) a local housing authority; b) a non-profit registered provider of social housing; c) a body which is registered as a social landlord under Part 1 of the Housing Act 1996; d) a police and crime commissioner; e) the Mayor's Office for Policing and Crime; f) a fire and rescue authority under the Fire and Rescue Services Act 2004; or g) a health service body within the meaning of section 9 of the National Health Service Act 2006

Buildings regulated by other enactments

4. A tenancy, licence or occupation of a house which is regulated under the following enactments:

• sections 87 to 87D of the Children Act 1989;

• section 43 (4) of the Prison Act 1952;

• The Secure Training Centre Rules 1998 8;

• The Prison Rules 1999 9;

• The Young Offender Institution Rules 200010;

• The Detention Centre Rules 200111;

• The Criminal Justice and Court Service Act 2000 (Approved Premises) Regulations 200112;

• The Care Homes Regulations 200113;

• The Children's Homes (England) Regulations 2015 14;

• The Residential Family Centres Regulations 2002 15.

4 Schedule 14 of the Act as amended and SI 2006/373

5 Paragraphs 2, 2A and 2B of schedule 14 as amended

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4 Schedule 14 of the Act as amended and SI 2006/373 5 Paragraphs 2, 2A and 2B of schedule 14 as amended

6 For of the definition of person managing and person having control Act see section 264 of the Act

7 Paragraph 3 of schedule 14 of the Act as amended and paragraph 6 (1) and schedule 1 of SI 2006/373

8 SI 1998/472 as amended

9 SI 1999/728 as amended

10 SI 2000/3371 as amended

11 SI 2001/238. Section 66 (4) of the Nationality, Immigration and Asylum Act 2002 provides that the reference to a detention centre is to be construed as a reference to a removal centre as defined in Part VIII of the Immigration and Asylum Act 1999

12 SI 2001/850 13 SI 2001/3965 as amended 14 SI 2001/3967

13 SI 2001/3965 as amended

14 SI 2001/3967 as amended 15 SI 2015/54

15 SI 2015/54

Certain student lettings etc

5. A building – a) which is managed or controlled by a specified educational establishment or is of a specified description of such establishments and b) the occupiers of the house or dwelling are undertaking a full time course of further or higher education at the specified establishment and c) the house or dwelling is being managed in conformity with an Approved Code of Practice for the management of excepted accommodation under section 233 of the Act.

Religious communities

6. A building which is occupied principally for the purpose of a religious community whose principal occupation is prayer, contemplation, education or the relief of the suffering except if the building is a converted block of flats to which section 257 of the Act applies. Buildings occupied by owners 7. A building which is only occupied by – a) one or more persons who hold the freehold or a leasehold interest granted for a term of more than 21 years of the whole, or any part of, the building b) and/or any member of the household of that person or persons but this exemption does not apply to a

converted block of flats to which section 257 of the Act applies, except for ascertaining the status of any flat within the block.

Buildings occupied by Resident Landlord etc.

8. A building which is occupied by a person or persons to whom paragraph 7 applies (subject to the proviso therein) and no more than two other persons, not forming part of the owner's household.

Buildings occupied by two persons

9. Any building which is only occupied by two persons (forming two households) Meaning of "building" 10. In this annex; a building includes a part of a building. See Paragraph 4 of schedule 14

See the schedule to

The Houses in Multiple Occupation (Specified Educational Establishments) (England) Regulations 2016/420 for the list of specified bodies

- The relevant codes of practice are approved under The Housing (Codes of Management Practice) (Student Accommodation) (England) Order 2010/2615 and specified in paragraphs 2 - 4 of that Order

- Paragraph 5 of schedule 14

- Paragraph 6 of Schedule 14

- For the definition of household see section 258 (2) and paragraphs 3 and 4 of SI 2006/373

- Paragraph 6 of schedule 14 and SI 2006/373

- Paragraph 6 (2) of SI 2006/373

- Paragraph 7 of schedule 14 of the Act

ANNEX D-

Article 4 of the Licensing of Houses in Multiple (Prescribed Description) (England) Order 2018, (as in force on the date of designation) Description of HMOs prescribed by the Secretary of State

4. A HMO is of a prescribed description for the purpose of section 55(2) (a) of the Act if it—

(a) is occupied by five or more persons;

(b) is occupied by persons living in two or more separate households; and

(c) meets;

(i) the standard test under section 254(2) of the Act;

(ii) the self-contained flat test under section 254(3) of the Act but is not a purpose-built flat situated in a block comprising three or more self-contained flats; or

(iii) the converted building test under section 254(4) of the Act.

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PUBLIC NOTICE

LONDON BOROUGH OF HAVERING

COUNCIL DESIGNATION OF AN AREA FOR SELECTIVE LICENSING

1. On the 18th December 2025, in the exercise of its powers under section 80 of the Housing Act 2004 ("the 2004 Act"), the London Borough of Havering ("the Council") of Town Hall, Main Road, Romford, RM1 3BB has made the London Borough of Havering Designation of an Area for Selective Licensing No.2 2026 ("the Designation").

2. This designation does not require confirmation by the Secretary of State. This designation was given general approval by the Cabinet of London Borough of Havering. This designation falls within a description of designations in relation to which the Secretary of State has given a general approval under section 82 of the Housing Act 2004 ("the Act"),: namely the Housing Act 2004 Licensing of Houses in Multiple Occupation and Selective Licensing of Other Residential Accommodation (England) General Approval 2024 which came into force on the 23 December 2024.

3. The Designation will come into force on the 18th March 2026 (not less than 3 months after decision date) and unless previously revoked, shall cease to have effect after 17th March 2031.

4. The Designation applies accordingly to the following 7 wards in the London Borough of Havering:

   A. Beam Park
   B. Harold Wood
   C. Rainham & Wennington
   D. Rush Green & Crowlands
   E. Squirrels Heath
   F. St Albans
   G. St Edwards

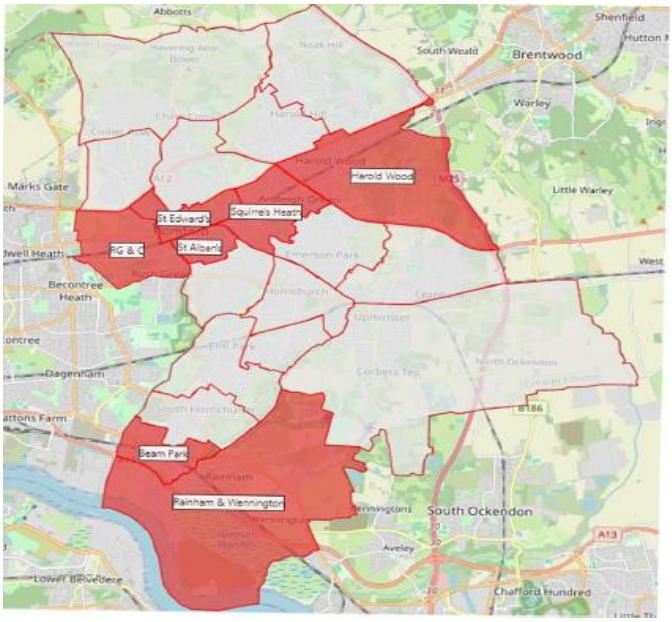
5. The following 13 wards are excluded:

   A. Havering Atte-Bower
   B. Gooshays
   C. Mawneys
   D. Marshalls & Rise Park
   E. Heaton
   F. Hylands & Harrow Lodge
   G. Emerson Park

H. Cranham
I. St. Andrews
J. Hacton
K. Elm Park
L. South Hornchurch
M. Upminster

6. See Annex A: LB Havering Map showing location of wards included shaded in red and those excluded in this scheme.

(Please see attached Map on Page 2 of the PDF which is a clearer copy – this will be inserted into the final Designation before publication).



7. Subject to the statutory exceptions summarised below, the Designation will apply to any building, house, maisonette or flat if (a) it is in the Designation area, and (b) the whole of it is occupied either under a single tenancy or licence that is not an exempt tenancy or licence (see below), or under two or more tenancies or licences of different dwellings contained in it, none of which is an exempt tenancy or licence.

8. The Council will comply with the notification requirements contained in section 83 of the Act and shall maintain a register of all houses registered under this designation, as required under section 232 of the Act.

9. Exempt tenancies and licences A tenancy or licence is an exempt tenancy or licence if: (a) it is granted by a non-profit registered provider of social housing; (b) it is granted by a profit-making registered provider of social housing in respect of social housing; (c) the building, house, maisonette or flat to which the tenancy or licence relates is subject to a prohibition order under section 20 of the 2004 Act, the operation of which has not been suspended in accordance with section 23 of the 2004 Act; (d) it is a tenancy which

cannot be an assured tenancy by virtue of section 1(2) of the Housing Act 1988 ("the 1988 Act") because it falls within paragraph 1 (business tenancies), paragraph 5 (licensed premises), paragraph 6 (tenancies of agricultural land), or paragraph 7 (tenancies of agricultural holdings) in Schedule 1 to the 1988 Act; (e) it is a tenancy or licence of a building, house, maisonette or flat that is managed or controlled by: (i) a local housing authority, (ii) a police authority established under section 3 of the Police Act 1996 ("the 1996 Act"), (iii) the Metropolitan Police Authority established under section 5B of the 1996 Act, (iv) a fire and rescue authority under the Fire and Rescue Services Act 2004, or (v) a health service body within the meaning of section 4 of the National Health Service and Community Care Act 1990; (f) it is a tenancy or licence of a building, house, maisonette or flat which is not a house in multiple occupation ("HMO") for any purposes of the 2004 Act except Part 1 by virtue of: (i) paragraph 3 of Schedule 14 to the 2004 Act (buildings regulated otherwise than under the 2004 Act) or (ii) paragraph 4(1) of that Schedule (buildings occupied by students); (g) it is a tenancy of a building, house, maisonette or flat where: (i) the full term of the tenancy is more than 21 years, (ii) the lease does not contain a provision enabling the landlord to determine the tenancy, other than by forfeiture, earlier than at end of the term, and (iii) the building, house, maisonette or flat is occupied by a person to whom the tenancy was granted or his successor in title or any members of such person's family; (h) it is a tenancy or licence of a building, house, maisonette or flat granted by a person to a person who is a member of his family where: (i) the person to whom the tenancy or licence is granted occupies the building, house, maisonette or flat as his only or main residence, (ii) the person granting the tenancy or licence is the freeholder or the holder of a lease of the building, house, maisonette or flat the full term of which is more than 21 years, and (iii) the lease referred to in sub-paragraph (ii) does not contain a provision enabling the landlord to determine the tenancy, other than by forfeiture, earlier than at end of the term; (I) it is a tenancy or licence that is granted to a person in relation to his occupancy of a building, house, maisonette or flat as a holiday home; or (j) it is a tenancy or licence under the terms of which the occupier shares any accommodation with the landlord or licensor or a member of the landlord's or licensor's family.

10. Statutory exceptions A statutory exception will apply if: (a) the building, house, maisonette or flat is a HMO and is required to be licensed under Part 2 of the 2004 Act (b) a temporary exemption notice made under section 86 of the 2004 Act is in force in respect of it; or (c) the building, house, maisonette or flat is subject to an Interim or Final Management Order made under Chapter 1 or 2 of Part 4 of the 2004 Act.

11. Consequences of failing to license a property or comply with licence conditions Unless a tenancy or licence is exempt as set out above, or a statutory exception applies, the building, house, maisonette or flat will require a licence under Part 3 of the 2004 Act upon the designation coming into force on 1st June 2023. (a) Upon the designation coming into force any person having control of or who manages a licensable property without a licence, or allows a licensed property to be occupied by more households or persons other than as authorised by a licence, is liable to prosecution and upon summary conviction is liable to an unlimited fine pursuant to the provisions in section 95 of the Housing Act 2004. (b) A person who breaches a condition of a licence is liable to prosecution and upon summary conviction is liable to an unlimited fine. (c)The Council, as an alternative to initiating a prosecution, may pursue one or more of a range of other

enforcement actions including the imposition of a financial penalty of up to £30,000 and/or taking management control of the unlicensed property. (d)Further, where an offence has been committed an application may also be made by the Council and/or tenant under the Housing and Planning Act 2016 for a Rent Repayment Order to pay back up to 12 months' rent, Housing Benefit or Universal Credit. (e) In certain circumstances to entry on one or more databases of rogue landlords or making a banning order. (f)No notice under section 21 of the Housing Act 1988 may be given in relation to an assured shorthold tenancy of the whole or part of an unlicensed house (as set out in section 96 Housing Act 2004) so long as it remains an unlicensed house and has no valid temporary exemption notice. (Please note the above legislation has been cited as at 17th November 2025 and may subsequently be amended).

12. Important notice:

    Where to obtain advice -

    The Designation may be inspected by prior appointment during standard office hours at (insert details).

    Dated:

    Signed:

    Helen Oakerbee

    Director of (insert details)

ANNEX B: Further interpretation on Paragraph 3: Exempt tenancies and licences Prohibition of occupation by law 1. A tenancy or licence of a house or a dwelling within a house where the house or the dwelling is subject to a prohibition order made under section 20 of the Act the operation of which has not been suspended under section 23. Certain tenancies, which cannot be assured tenancies 2. A tenancy which cannot be an assured tenancy by virtue of section 1 (2) of the Housing Act 1988 comprised in Part of Schedule 1 of the Act, which is: Paragraph 1: A tenancy which is entered into before, or pursuant to a contract made before, the commencement of this Act. Paragraph 2: A tenancy which is entered into on or after 1st April 1990 (otherwise than, where the dwelling-house had a rateable value on 31st March 1990, in pursuance of a contract made before 1st April 1990), and under which the rent payable for the time being is payable at a rate exceeding [£100,000] a year. Paragraph 2A: A tenancy which was entered into before the 1st April 1990, or on or after that date in pursuance of a contract made before that date, and under which the dwelling-house had a rateable value on the 31st March 1990 which, if it is in Greater London, exceeded £1,500 and, if it is elsewhere, exceeded £750. Paragraph 3: A tenancy under which for the time being no rent is payable. Paragraph 3A: A tenancy which is entered into on or after 1st April 1990

(otherwise than, where the dwelling-house had a rateable value on 31st March 1990, in pursuance of a contract made before 1st April 1990), and under which the rent payable for the time being is payable at a rate of, if the dwelling-house is in Greater London, £1,000 or less a year and, if it is elsewhere, £250 or less a year. Paragraph 3B: (f) A tenancy which was entered into before 1st April 1990 or, where the dwelling-house had a rateable value on the 31st March 1990, on or after 1st April 1990 in pursuance of a contract made before that date and under which the rent for the time being payable is less than two-thirds of the rateable value of the dwelling-house on 31st March 1990. ("rent" does not include any sum payable by the tenant as is expressed (in whatever terms) to be payable in respect of rates, [council tax,] 3 services, management, repairs, maintenance or insurance, unless it could not have been regarded by the parties to the tenancy as a sum so payable. This definition of rent does not apply to (b) above). Paragraph 4: A business tenancy under Part II of the Landlord and Tenant Act 1954. Paragraph 5: A tenancy under which the dwelling-house consists of or comprises [premises which, by virtue of a premises licence under the Licensing Act 2003, may be used for the supply of alcohol (within the meaning of section 14 of that Act)]1 for consumption on the premises. Paragraph 6: A tenancy under which agricultural land, exceeding two acres, is let together with the house. In this paragraph "agricultural land" has the meaning set out in section 26(3)(a) of the General Rate Act 1967 (exclusion of agricultural land and premises from liability for rating). Paragraph 7: A tenancy under which the dwelling-house is comprised in an agricultural holding, and is occupied by the person responsible for the control (whether as tenant or as servant or agent of the tenant) of the farming of the holding. A tenancy under which the dwelling-house is comprised in the holding held under a farm business tenancy, and is occupied by the person responsible for the control (whether as tenant or as servant or agent of the tenant) of the management of the holding. Paragraph 8: A tenancy which is granted to a person who is pursuing, or intends to pursue, a course of study provided by a specified educational institution and is so granted either by that institution or by another specified institution or body of persons. In sub-paragraph above "specified" means specified, or of a class specified, for the purposes of this paragraph by regulations made by the Secretary of State by statutory instrument. A statutory instrument made in the exercise of the power conferred by sub-paragraph (2) above shall be subject to annulment in pursuance of a resolution of either House of Parliament. Paragraph 9: A tenancy the purpose of which is to confer on the tenant the right to occupy the dwelling-house for a holiday. Paragraph 10: (1) A tenancy in respect of which the following conditions are fulfilled— (a) that the dwelling-house forms part only of a building and, except in a case where the dwelling-house also forms part of a flat, the building is not a purpose-built block of flats; and (b) that, subject to Part III of this Schedule, the tenancy was granted by an individual who, at the time when the tenancy was granted, occupied as his only or principal home another dwelling-house which,— (i) in the case mentioned in paragraph (a) above, also forms part of the flat; or (ii) in any other case, also forms part of the building; and (c) that, subject to Part III of this Schedule, at all times since the tenancy was granted the interest of the landlord under the tenancy has belonged to an individual who, at the time he owned that interest, occupied as his only or principal home another dwelling-house which,— (i) in the case mentioned in paragraph (a) above, also formed part of the flat; or (ii) in any other case, also formed part of the building; and (d) that the tenancy is not one which is excluded from this sub-paragraph by subparagraph (3) below. (2) If a tenancy was granted by two or more persons jointly, the

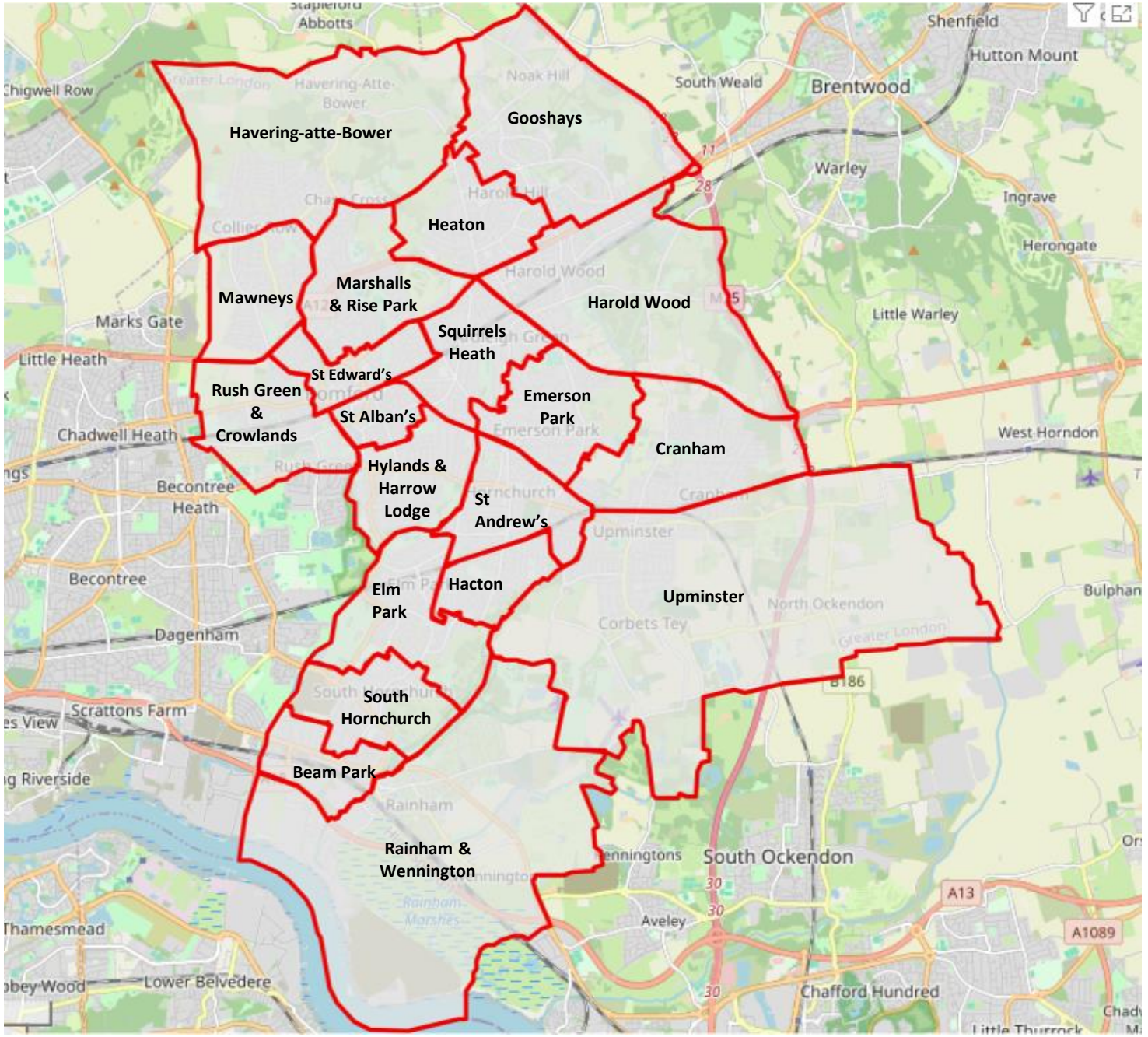
reference in subparagraph (1)(b) above to an individual is a reference to any one of those persons and if the interest of the landlord is for the time being held by two or more persons jointly, the reference in sub-paragraph (1)(c) above to an individual is a reference to any one of those persons. (3) A tenancy (in this sub-paragraph referred to as “the new tenancy”) is excluded from sub-paragraph (1) above if— (a) it is granted to a person (alone, or jointly with others) who, immediately before it was granted, was a tenant under an assured tenancy (in this sub-paragraph referred to as “the former tenancy”) of the same dwelling-house or of another dwelling-house which forms part of the building in question; and (b) the landlord under the new tenancy and under the former tenancy is the same person or, if either of those tenancies is or was granted by two or more persons jointly, the same person is the landlord or one of the landlords under each tenancy. Paragraph 11: (1)Crown or to a government department or is held in trust for Her Majesty for the purposes of a government department. (2) The reference in sub-paragraph (1) above to the case where the interest of the landlord belongs to Her Majesty in right of the Crown does not include the case where that interest is under the management of the Crown Estate Commissioners [or it is held by the Secretary of State as the result of the exercise by him of functions under Part III of the Housing Associations Act 1985]1 . Paragraph 12: (1) A tenancy under which the interest of the landlord belongs to— (a) a local authority, as defined in sub-paragraph (2) below; (b) the Homes and Communities Agency but only if the tenancy falls within subsections (2A) to (2E) of section 80 of the Housing Act 1985; (ba) the Welsh Ministers but only if the tenancy falls within subsections (2A) to (2E) of section 80 of the Housing Act 1985;] (d) an urban development corporation established by an order under section 135 of the Local Government, Planning and Land Act 1980; (da) a Mayoral development corporation (e) a development corporation, within the meaning of the New Towns Act 1981; (ee) the London Fire Commissioner; (f) an authority established under section 10 of the Local Government Act 1985 (waste disposal authorities); (g) a residuary body, within the meaning of the Local Government Act 1985; (gg) The Residuary Body for Wales (Corff Gweddilliol Cymru); (h) a fully mutual housing association [, unless the tenancy is one which is excluded from this sub-paragraph by sub-paragraph (3) below] ; or (i) a housing action trust established under Part III of this Act. (2) The following are local authorities for the purposes of sub-paragraph (1)(a) above— (a) the council of a county, [county borough,]8 district or London borough; (b) the Common Council of the City of London; (c) the Council of the Isles of Scilly; (d) the Broads Authority;[(da) a National Park authority; (e) the Inner London Education Authority; and (ea) a fire and rescue authority created by an order under section 4A of the Fire and Rescue Services Act 2004;]10 (f) a joint authority, within the meaning of the Local Government Act 1985 [and] (fa) an economic prosperity board established under section 88 of the Local Democracy, Economic Development and Construction Act 2009; (fb) a combined authority established under section 103 of that Act;] (g) a police and crime commissioner.] (3) A tenancy is excluded from sub-paragraph (1) if all of the following requirements are met— (a) the interest of the landlord belongs to a fully mutual housing association; (b) the dwelling-house is in Wales; (c) the tenancy is granted on or after the date on which this sub-paragraph comes into force; (d) the tenancy is in writing; (e) before the tenancy is granted, the landlord has served on the person who is to be the tenant a notice stating that the tenancy is to be excluded from sub-paragraph (1); (f) the tenancy states that it is excluded from sub-paragraph (1). Paragraph 12A: (1) A tenancy granted by a private landlord under arrangements for the provision of support for

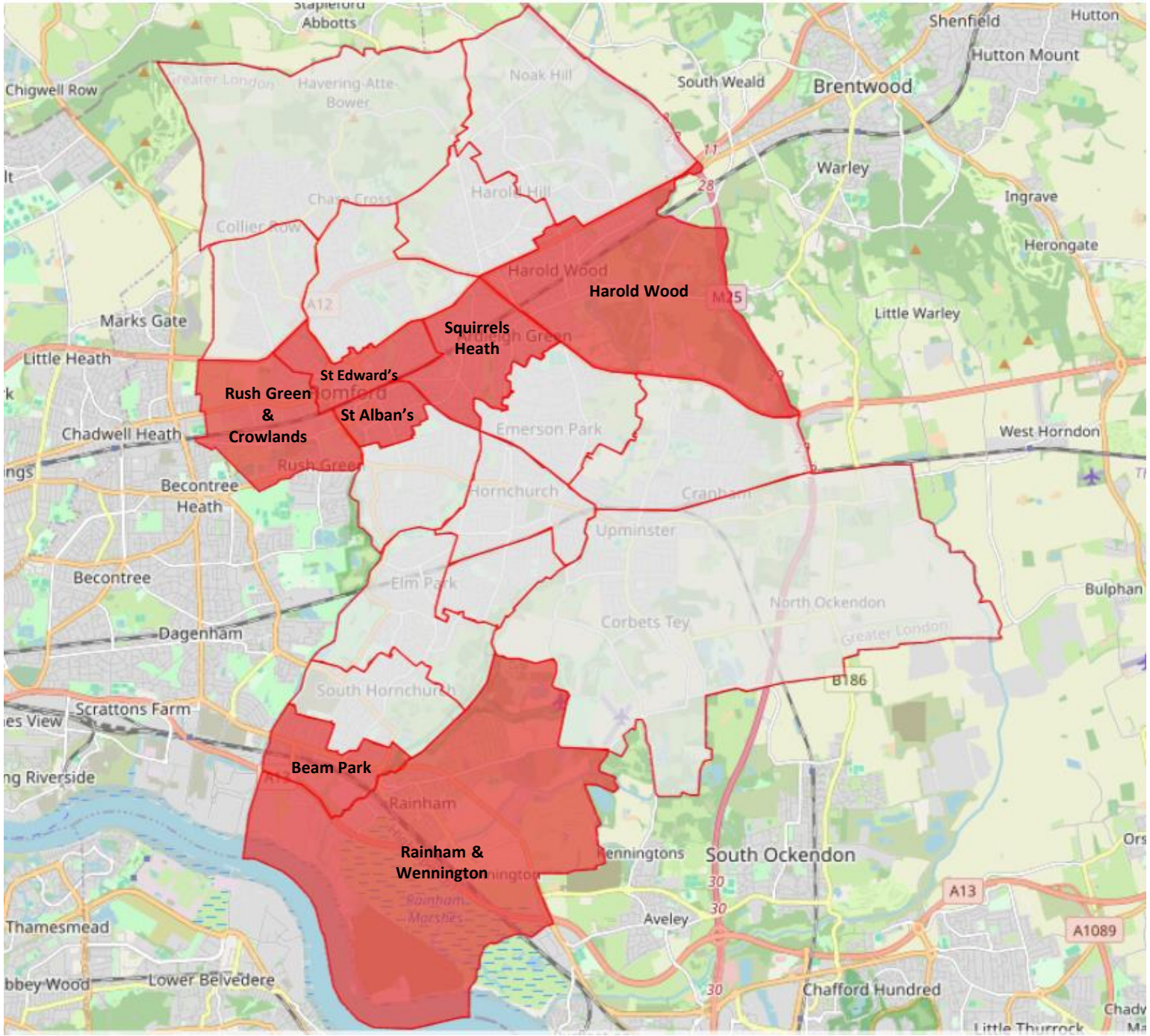
asylum-seekers or dependants of asylum-seekers made [under section 4 or Part VI of the Immigration and Asylum Act 1999]2. (2) “Private landlord” means a landlord who is not within section 80(1) of the Housing Act 1985. Paragraph 12ZA: (1) A family intervention tenancy. (2) But a family intervention tenancy becomes an assured tenancy if the landlord notifies the tenant that it is to be regarded as an assured tenancy. (For further information please see paragraph 12ZA sub sections 3 – 12). Paragraph 13: (1) A protected tenancy, within the meaning of the Rent Act 1977. (2) A housing association tenancy, within the meaning of Part VI of that Act. (3) A secure tenancy. (4) Where a person is a protected occupier of a dwelling-house, within the meaning of the Rent (Agriculture) Act 1976, the relevant tenancy, within the meaning of that Act, by virtue of which he occupies the dwelling-house. Tenancies, licences etc. regulated by other enactments A tenancy, licence or occupation of a house which is regulated under the following enactments: (a) sections 87 to 87D of the Children Act 1989 (b) section 43 (4) of the Prison Act 1952 (c) (section 34 of the Nationality, Immigration and Asylum Act 2002 has now been repealed is no longer in force) (d) The Secure Training Centre Rules 1998 (e) The Prison Rules 1999 (f) The Young Offender Institute Rules 2000 (g) The Detention Centre Rules 2001 (h) The Criminal Justice and Court Service Act 200 (Approved Premises) Regulations 2001 (i) The Care Homes Regulations 2001 (j) The Children’s Homes Regulations 2001 (k) The Residential Family Centres Regulations 2002 Long leaseholders A tenancy of a house or a dwelling within a house provided that – (i) the full term of the tenancy is for more than 21 years and (ii) the tenancy does not contain a provision enabling the landlord (or his successor his in title) to determine it other than by forfeiture, earlier than at the end of the term and (iii) the house or dwelling is occupied by a person to whom the tenancy was granted or his successor in title or by any members of either of those person’s family. Certain family arrangements A tenancy or licence of a house or a dwelling within a house where – (i) the person who has granted the tenancy or licence to occupy is a member of the family of the person who has been granted the tenancy or licence and (ii) the person who has granted the tenancy or licence to occupy is the freeholder or long leaseholder of the house or dwelling and (iii) the person occupies the house or dwelling as his only or main residence (and if there are two or more persons at least one of them so occupies). Certain lettings etc. by Resident Landlord etc. A tenancy or licence of a house or a dwelling within a house under the terms of which the person granted the tenancy or licence shares the use of any amenity with the person granting that tenancy or licence or members of that person’s family. An “amenity” includes a toilet, personal washing facilities, a kitchen, or a living room but excludes any area used for storage, a staircase, corridor, or other means of access. Interpretation 10. In this designation notice: a) a “person” includes” persons”, where the context is appropriate b) a “tenancy” or “licence” includes “a joint tenancy” or “joint licence”, where the context is appropriate c) “long leaseholder” in paragraph 7 (ii) has the meaning conferred in paragraphs (i) and (ii) and in those paragraphs the reference to “tenancy” means a “long lease” d) a person is a member of the family of another person if – (i) they live with that person as a couple (ii) one of them is the relative of the other; or (iii) one of them is, or is a relative of, one member of a couple and the other is a relative the other member of the couple and (iv) For the purpose of this paragraph – 1) “couple” means two persons who are married to each other or live together as husband and wife or in an equivalent arrangement in the case of persons of the same sex 2) “relative” means a parent, grandparent, child, grandchild, brother, sister, uncle, aunt, nephew, niece or cousin 3) a relationship of the half-blood is

to be treated as a relationship of the whole blood and 4) a stepchild of a person is to be treated as their child.

(Please note the above legislation has been cited as at 17th November 2025 and may subsequently

Be amended).


Havering-atte-Bower
Gooshays
Heaton
Mawneys
Marshalls & Rise Park
Harold Wood
Squirrels Heath
St Edward's
Rush Green & Crowlands
St Alban's
Emerson Park
Cranham
Hylands & Harrow Lodge
St Andrew's
Hacton
Elm Park
Upminster
South Hornchurch
Beam Park
Rainham & Wennington
Brentwood
Shenfield
Hutton Mount
South Weald
Warley
Ingrave
Herongate
Little Warley
West Horndon
Marks Gate
Little Heath
Chadwell Heath
Becontree Heath
Becontree
Dagenham
Scrattons Farm
Rainham
South Ockendon
Aveley
Chafford Hundred
A13
A1089
B186
Thamesmead
Lower Belvedere
North Ockendon
Corbets Tey
Bulphan


Harold Wood
Squirrels Heath
St Edward's
Rush Green & Crowlands
St Alban's
Beam Park
Rainham & Wennington
Brentwood
South Weald
Warley
Ingrave
Herongate
Little Warley
West Horndon
Marks Gate
Little Heath
Chadwell Heath
Becontree Heath
Becontree
Dagenham
Emerson Park
Upminster
Cranham
Hornchurch
Elm Park
North Ockendon
Corbets Tey
Bulphan
South Ockendon
Aveley
Chafford Hundred
Rainham
Scrattons Farm
Thamesmead
Lower Belvedere
A13
A1089
B186
M25

Scheme Objectives

Licensing is part of a broader, coordinated approach to help improve privately rented properties in Havering. In general terms, we propose to use selective and additional licensing to continue to improve property conditions within the borough and keep our residents safe. We are committed to improving property conditions and management standards in the PRS, so that it contains good quality accommodation, helps us to achieve sustainable communities and continues to contribute positively to the local economy.

The objectives of the proposed schemes are outlined below:

	Objective	Outcome
1.	**Improve housing conditions in the PRS by eliminating poor property standards**	• Licensed properties are monitored, and licence conditions robustly enforced and complied with • Poor Housing Conditions are improved with category 1 & 2 hazards resolved (including issues such as damp and mould) • Improved health, safety and welfare of tenants in the PRS • The Council will gain increased knowledge of the private rented sector in the borough. This will enable targeted enforcement and support for landlords
2.	**Improve management standards in PRS properties**	• Landlords actively manage their properties or be enforced against • Absentee or unfit landlords employ an agent to actively manage their properties to ensure compliance • Prevention of overcrowding through better management of property occupancy • Greater number of landlords become accredited improving the professionalism of landlords in the PRS • Engagement with landlords improved • Landlords are kept informed of latest legislation and good practice • Responsible landlords will become more involved in Council licensing schemes and receive information and support • Irresponsible landlords will be forced to improve their properties or be enforced against

	Objective	Outcome
3.	**Increased awareness for tenants of the minimum standards to be expected in rented accommodation and what their other rights are when renting in the PRS**	• Information for tenants on the local licensing scheme advertised and third-party support for tenants made available • Dedicated tenants' advice section created on web site • Officers to provide tenants with information and sign posting to support their housing and wider needs • Improved tenants' support through work with third parties. • Renters know their rights and responsibilities and have greater awareness of and access to Council services that can support them • Tenants will see economic benefits such as reduced heating costs, bringing them out of fuel poverty

Additional HMO Licensing Licence Conditions

Standard Conditions for Licences granted under Part 2 Housing Act 2004

NOTES

1. Definitions

In these licence conditions:

a. "HMO" refers to the building or part of a building, which is licensed under Part 2 of the Housing Act 2004 (The Act).

b. *"Authority"* refers to the local housing authority, namely the London Borough of Havering.

c. "*Licence Holder*" refers to: (a) the person to whom the Authority has granted this licence; and (b) from the date of his or her consent, any other person who agrees to comply with the licence restrictions and obligations that follow.

2. The following are standard conditions that will be attached to each licence. In some circumstances, where the Council believes there are specific issues not covered in the standard conditions for a particular property, additional or more specific conditions will be added.

The person to whom this licence is granted is responsible for ensuring compliance with its conditions at all times and remains so whether or not another person has also agreed to be bound by them.

1. Permitted Occupation

1.1 The maximum occupancy for this house in multiple occupation (HMO) is **X** people in **X** households.

Floor	Room	Size - m^2	People	Households
Ground				
First				
Second				

1.2 A new resident must not be permitted to occupy the HMO or any part of the HMO if that occupation exceeds the maximum numbers of persons and households specified in the licence. A new resident means a person who was not an occupier of the HMO and/or the specific room at the date of the issue of the licence.

1.3 The Licence Holder will be required to ensure that the numbers of households and/or persons residing in the HMO do not exceed the maximum numbers specified in the licence. The table above outlines the number of people and households allowed per room. These numbers will relate to the amenities that are, or can be, provided and/or to the size and layout of the units of accommodation available.

1.4 If numbers exceed the specified maximum levels at the time of licence issue, the Licence Holder will be expected to ensure that the numbers are reduced at the earliest opportunity. Existing tenancies must be allowed to run their full tenancy term, unless agreed with tenant/s, an earlier termination that complies with the correct statutory procedure. Any steps to reduce occupancy must be taken within the legal remit and the Licence Holder must abide by the provisions of the Protection from Eviction Act 1977 or its successor legislation.

2. Minimum Space Standards

2.1 The Licence Holder must ensure that:

a) **the floor area of any room in the HMO used as sleeping accommodation by one person aged over 10 years is not less than 6.51 square metres;**
b) **the floor area of any room in the HMO used as sleeping accommodation by two persons aged over 10 years is not less than 10.22 square metres;**
c) **the floor area of any room in the HMO used as sleeping accommodation by one person aged under 10 years is not less than 4.64 square metres;**
d) **any room in the HMO with a floor area of less than 4.64 square metres is not used as sleeping accommodation.**

2.2 The Licence Holder must ensure that:

a) **where any room in the HMO is used as sleeping accommodation by persons aged over 10 years only, it is not used as such by more than the maximum number of persons aged over 10 years specified in the licence;**
b) **where any room in the HMO is used as sleeping accommodation by persons aged under 10 years only, it is not used as such by more than the maximum number of persons aged under 10 years specified in the licence;**

c) **where any room in the HMO is used as sleeping accommodation by persons aged over 10 years and persons aged under 10 years, it is not used as such by more than the maximum number of persons aged over 10 years specified in the licence and the maximum number of persons aged under 10 years so specified.**

The maximum number of persons who may occupy the HMO and the maximum number of persons who may occupy each room are specified in the licence documentation. Both elements of these occupancy requirements must be met; please note that the (overall) maximum number of persons permitted to occupy the HMO may be lower than the sum of the total numbers of persons allowed to occupy the HMO on a room by room basis.

2.3 **In the event that the Council has notified the Licence Holder of a breach of licence condition 2.1 or 2.2 above, the Licence Holder must ensure that all necessary steps are taken to remedy the breach within a specified period, not exceeding 18 months from the date of notification of that breach.**

2.4 **The Licence Holder must ensure that the Council is notified of any room in the HMO with a floor area of less than 4.64 square metres.**

For the purposes of conditions 2.1 – 2.4 above:

a) *A reference to a number of persons using a room in an HMO as sleeping accommodation does not include a person doing so as a visitor of an occupier of the HMO (as defined in section 262 Housing Act 2004).*
b) *A room is used as sleeping accommodation if it is normally used as a bedroom, whether or not it is also used for other purposes.*
c) *Any part of the floor area of a room in relation to which the height of the ceiling is less than 1.5 metres is not to be taken into account in determining the floor area of that room for the purposes of this paragraph.*
d) *The conditions do not apply to an HMO which is managed by a charity registered under the Charities Act 2011 and which is a night shelter, or consists of temporary accommodation for persons suffering or recovering from drug or alcohol abuse or a mental disorder.*

3. Tenancy Agreement

The Licence Holder must;

3.1 **Provide to all the occupiers of the HMO, a written statement of the terms on which they occupy the property e.g. a tenancy or licence agreement.**

3.2 Retain copies of any such written statement(s) throughout any occupier's occupation and must provide the Authority with a copy of any such statement or statements within 7 days on demand.

3.3 Protect any deposit taken under an assured shorthold tenancy by placing it in a statutory tenancy deposit scheme within 30 calendar days from the day the deposit is received and must provide the tenant with details of how their deposit has been protected within the same 30-day period. This information must be provided to the Authority within 7 days on demand.

3.4 Information provided to the tenant must include the following:

- The name and address of landlord
- The name and address of the Licence Holder or managing agent
- A contact address and daytime telephone number
- An emergency telephone number

4. References

The Licence Holder must;

4.1 Ensure that references are demanded for each person who wishes to occupy the HMO.

4.2 No new occupiers shall be allowed to occupy the HMO if they are unable to provide suitable references. References should be as a minimum, checks to ensure the tenants identity, whether they have the right to rent a property their ability to pay rent and their past tenant history) [see https://www.gov.uk/check-tenant-right-to-rent-documents/who-to-check].

4.3 Ensure that copies of obtained references are retained for the duration of the licence and that the Authority is provided with a copy of any such references and records within 21 days, on demand.

5. Tenancy Management

The Licence Holder must;

5.1 Ensure that only they or the named agent (that the Licence Holder has notified to the Council) creates new tenancies or licences to occupy this property whilst this licence is in force. Copies of any new written terms of tenancies or licences must be provided to the Council within 21 days on demand.

5.2 On commencement of a new tenancy provide the following prescribed information to their tenant:

- Where applicable an Energy performance certificate (The rating of the EPC must meet the current version of the Minimum Energy Efficiency Standards Regulations at the time of letting unless exempt)
- A valid gas safety certificate
- A copy of the Government ‘“How to rent: the checklist for renting in England”.

5.3 Ensure that when rent or licence fees are collected or received in cash from the occupiers, a written rent receipt must be given to the occupiers within 7 days of receiving the rent. (This can be an email or written invoice confirming to the tenant the date and amount paid). Copies of the rent receipts and records must be provided to the Authority within 7 days on demand.

5.4 Ensure that occupants of the HMO receive written notice about how they should deal with repair and maintenance issues and with emergencies, should they arise. Copies of the written notice must be provided to the Authority within 21 days on demand.

5.5 Ensure that they or anyone acting on their behalf (e.g., a managing agent or contractor) give the tenant or occupier at least 24 hours’ written notice of their intention to enter the HMO and specify the reasons why entry is required.

If the HMO is let on a shared tenancy with exclusive use, this notice applies to the entire property. If the HMO is let on a per room basis, at least 24 hours’ notice is required to enter the tenant’s bedroom, but not to enter the common parts of the building.

The exception to this is when it would not be reasonable to give such notice and access is urgent, for example in an emergency.

6. Documents to be displayed

The Licence Holder must;

6.1 Display the following information in a prominent position in the common parts of the HMO or provide the required information to tenants at the start of a tenancy:

a) A copy of the licence and these conditions, particularly highlighting the occupancy limits: and
b) A notice with the name, address, daytime telephone number and emergency contact number of the Licence Holder or managing agent.

7. Gas Safety

If gas is supplied to the property, the Licence Holder must;

7.1 **Produce to the Authority, annually for their inspection, a gas safety certificate obtained in respect of the HMO within the last 12 months.**

7.2 Provide the Authority with a copy of the gas safety certificate within 7 days, on demand.

7.3 Provide a copy of the current valid gas safety certificate to all tenants or occupiers at the beginning of their tenancy/occupancy and within 28 days of all subsequent annual gas safety checks during the term of occupation. A written record that this has been provided must be kept and provided to the Authority within 7 days on demand.

8. Electrical Safety

The Licence Holder must;

8.1 **Keep all electrical appliances made available by them in the HMO in a safe condition and provide the Authority with a declaration as to the safety of such appliances within 7 days on demand.**

8.2 **Ensure that every electrical installation in the HMO is in proper working order and safe for continued use; and provide the Authority with a declaration as to the safety of such installations within 7 days on demand. For the purpose of this condition 'Electrical installation" has the meaning given in regulation 2(1) of the Building Regulations 2010**

9. Furniture Safety

The Licence Holder must;

9.1 **Keep all furniture made available by them in the HMO in a safe condition and provide the Authority with a declaration as to the safety of such furniture within 7 days on demand.**

9.2 All upholstered furniture and mattresses supplied by the Licence Holder shall comply with the requirements of The Furniture and Furnishings (Fire) (Safety) Regulations 1988.

10. Smoke Alarms

The Licence Holder must;

10.1 **Ensure that a smoke alarm is installed on each storey of the HMO on which there is a room used wholly or partly as living accommodation (including a bathroom, lavatory, hall or landing). For the purpose of this condition a bathroom or lavatory is to be treated as a room used as living accommodation.**

10.2 **Ensure each installed smoke alarm is kept in proper working order.**

10.3 **Provide to the Authority, within 7 days on demand, with a declaration by them as to the condition and positioning of any smoke alarm.**

10.4 Ensure that at the start of every tenancy all smoke alarms are tested and are in proper working order.

11. Carbon Monoxide Alarms

The Licence Holder must;

11.1 **Ensure that a carbon monoxide alarm is installed in any room that is used wholly or partly as living accommodation and contains a fixed combustion appliance other than a gas cooker**. **For the purpose of this condition 'room' includes a hall or landing and a bathroom or lavatory is to be treated as a room used as living accommodation.**

11.2 **Ensure that each Carbon Monoxide alarm is kept in proper working order.**

11.3 **Provide to the Authority, within 7 days on demand, with a declaration by them as to the condition and positioning of any carbon monoxide alarm.**

11.4 Ensure that at the start of every tenancy all carbon monoxide alarms are tested and are in proper working order.

12. Fire Safety

12.1 The Licence Holder must ensure that a Fire Risk Assessment is undertaken in accordance with The Regulatory Reform (Fire Safety) Order 2005 and that action to minimise the risk of fire at the HMO is taken in accordance with the assessment.

12.2 The Licence Holder must ensure that any fire detection equipment, fire alarms and emergency lighting at the HMO are maintained in good working order by competent persons and are periodically serviced and tested in accordance with the relevant British Standards requirements for servicing and testing, being BS 5839 part 6 2019+A1:2020 for fire detection and fire alarm systems, and BS 5266 for emergency lighting systems.

12.3 The Licence Holder must ensure that the Council is provided with, if requested, a copy of the Fire Risk Assessment, all periodical inspection reports and test certificates for any automatic fire alarm system, emergency lighting and fire-fighting equipment provided in the HMO

12.4 Fire precautions and equipment must be maintained in proper working order. Appropriate records of such maintenance, such as current certificates, are to be kept and produced to the Council on demand as evidence of such maintenance. Any defects noted on certification must be promptly rectified, to a timescale agreed with the Authority in writing.

12.5 At the start of each tenancy, occupants must be given appropriate fire safety advice regarding the means of escape in case of fire and other fire precautions. In particular, the importance of keeping fire doors closed and keeping the escape route clear.

13. Flats in Multiple Occupation (FMO) in a block of flats

13.1 The Licence Holder shall ensure the tenants of the Flat in Multiple Occupation (FMO) are informed in writing of the fire safety arrangements in place within the block, being, but not restricted to:

a. Evacuation arrangements, e.g. an all-out or stay-put policy.
b. The safest route to safety from the FMO.
c. The designated fire assembly area.
d. Fire Drill arrangements (if any).
e. Fire Warden and/or waking watch arrangements (where provided).
f. The nearest manual call point (where provided).

14. Access to Utility Meters

14.1 The Licence Holder must;

Ensure that all tenants can access and obtain readings of the utility meters (gas, electricity and water, as applicable) for the property at reasonable times (no less than the delivery frequency of the utility bills) during the course of the tenancy and a final reading at the termination of the tenancy.

15. Antisocial Behaviour (ASB)

The Licence Holder must;

15.1 Take all reasonable and practicable steps to prevent or reduce antisocial behaviour by persons occupying or visiting the HMO.

15.2 Make clear to the tenant with verbal and written warnings as appropriate that further instances of anti-social behaviour will not be tolerated.

15.3 Where antisocial behaviour is sustained and regular, and where appropriate, utilise the clauses of any written agreement under which the tenant occupies the property to legally end the tenancy. Evidence of such must be available to the Authority upon request.

15.4 Work in partnership with the Authority and Police where appropriate to prevent or reduce antisocial behaviour. This includes all persons occupying or visiting the HMO and where necessary follow guidance provided by the Authority or Police.

15.5 Where tenants and/or their visitors have been found to have used the property for illegal or immoral purposes, the Licence Holder must take reasonable and practical steps including informing the Private Sector Housing Team and Police. Evidence of such action must be available to the Authority upon request.

15.6 Where the Licence Holder is specifically invited, they shall attend any case conferences or multi agency meetings arranged by the Authority or the Police to reduce or prevent ASB / illegal or immoral activity in relation to their tenant and visitors to the property.

For the purpose of conditions 15.1 to 15.6 anti-social behaviour is taken to comprise behaviour by the occupants of the HMO and/or their visitors, which causes alarm, harassment or distress to other occupants of the HMO, to lawful visitors to the HMO or to persons residing in or lawfully visiting the neighbouring area of the HMO.

16. Property Management and Safety

The Licence Holder must;

16.1 Ensure no person who has previously applied for a property licence in respect of the property and has either:

a. been found not to be a Fit and Proper person, or

b. been made subject to a Banning Order under the Housing and Planning Act 2016

to have control or management of the property, or to carry out or arrange any repair, improvement, or other building works at the property.

16.2 Ensure that inspections of the HMO are carried out at least every three months to identify any problems relating to the management, use and occupation of the HMO and its condition and contents. Records of such inspections shall be kept for the duration of this licence. As a minimum requirement, the records must contain a log of who carried out the inspection, date and time of inspection and issues found, and action(s) taken.

16.3 Provide to the Authority within 21 days on demand, a copy of the inspection record.

16.4 Ensure the property is adequately managed and have satisfactory maintenance arrangements in place. All repairs, improvement works or treatments to the property or any installations, facilities, or equipment within it are to be carried out by competent and reputable persons, whether they are employed directly by the Licence Holder, an agent/employee of the Licence Holder, or by the landlord (if different). Works must be completed to a reasonable standard. Copies of receipts and/or invoices for any such works must be provided to the Authority within 21 days on demand.

16.5 Ensure that the internal structure of the HMO is maintained in good repair and that any fixtures and fittings and appliances made available are maintained in good repair and working order.

16.6 Ensure, as far as is reasonably practicable, that the exterior of the property (including any boundary walls, gates, and yards) is maintained in reasonable decorative order and in a good state of repair, that the exterior is free from graffiti and fly posters, and that gardens are maintained and kept reasonably clean and tidy.

17. Pest Control

The Licence Holder must;

17.1 Ensure that regular checks, at least every 3 months, are carried out to ensure that the HMO is free from pest infestation. Where the Licence Holder becomes aware of a pest problem or infestation at the HMO they shall, within 7 days, take steps to ensure that a treatment program is carried out to eradicate the pest infestation.

17.2 Records shall be kept of such treatment programs and copies of these must be provided to the Authority within 7 days on demand.

18. Waste Disposal

The Licence Holder must;

18.1 Ensure at the start of any new tenancy, occupiers are provided with the following information on Waste and Recycling, in writing:

a. The collection days for refuse and recycling for the property https://www.havering.gov.uk/rubbish-recycling/check-collection-day

b. Details on what they can and cannot recycle https://havering-self.achieveservice.com/service/LBH_Rubbish_and_recycling___What_goes_where_guide

c. How they may dispose of bulky waste https://www.havering.gov.uk/rubbish-recycling/bulky-collections

18.2 A copy of the information provided to the occupiers in relation to condition 18.2 must be kept for the duration of the tenancy plus six months and provided to the Authority within 21 days on demand

18.3 **Provide the tenants with adequate facilities for the disposal of refuse and recycling. The Licence Holder must ensure that there are suitable and appropriate receptacles for the storage of household refuse and recycling between collections, so that bags or loose refuse and recycling are not stored outside the property.**

18.4 Where the standard local authority waste collection schemes do not suffice, the Licence Holder must arrange for private collections of waste from the property.

18.5 Carry out regular checks, at least every three months, to ensure that the common parts, gardens and yards are free from waste, which could provide harbourage for pests and/or is a nuisance and/or is detrimental to the local amenities, other than waste stored in appropriate receptacles for the storage of household refuse and recycling; and that waste such as old furniture, bedding, rubbish or refuse from the property is not left outside the property or in its vicinity.

18.6 Ensure that any waste generated during building work or during change of tenancy (for example old furniture or bedding) from the HMO is not left on, or immediately outside, the property or private land and is disposed of in a safe and lawful manner.

18.7 If they become aware that the occupiers of the property or their visitors are not using the waste disposal facilities provided and/or leaving waste outside the property or in its vicinity (for example old furniture, mattresses), they must write a warning letter to the occupiers within 7 days advising them to remove the items immediately. A copy must be kept and must be provided to the Council within 7 days on demand.

19. Standard of Accommodation

The Licence Holder must;

19.1 Keep in repair and proper working order:

a. the structure and exterior (including drains, gutters and external pipes)
b. the installations for the supply of water, gas and electricity and for sanitation (including basins, sinks, baths and toilets)
c. the installations for space heating and heating water.

19.2 Ensure that there are no deficiencies at the start of a tenancy which would make the premises not reasonably suitable for occupation, and if any deficiencies arise during the period of a tenancy remedial action must be taken by the landlord as soon as is practicable.

19.3 Take reasonable steps to prevent smoking in the common parts of the HMO.

20. Material changes of circumstance

The Licence Holder must;

20.1 Notify the Authority, within 14 days of any material change in circumstances and, within 14 days of becoming aware of them, of any known and material change in the circumstances of any person managing or involved in the management of the HMO that may require the licence to be varied, revoked or require a fit and proper person check to be made, including:

a. Details of any unspent convictions not previously disclosed to the Authority that may be relevant to the Licence Holder or the property manager or the status of either of them as a ‘fit and proper person’, including in particular a conviction in respect of any offence involving fraud or dishonesty, violence, drugs or any offence listed in Schedule 3 to the Sexual Offences Act 2003.

b. Details of any finding by a court or tribunal against the Licence Holder and/or the property manager that he or she has practised unlawful discrimination.

c. Details of any contravention on the part of the Licence Holder or property manager relating to housing, public health, environmental health, or landlord and tenant law, which has led to civil or criminal proceedings and a judgment or finding being made against him or her.

d. Information about any property the Licence Holder or property manager owns or manages, or has owned or managed:
   i which has been made subject to a control order under section 379 of the Housing Act 1985, in the five years preceding the date of the application; or
   ii which has been the subject of any enforcement action described under Part 1 sections 5(2) or 7(2) of the Housing Act 2004, concerning Category 1 and Category 2 housing condition hazards; or
   iii in relation to which a local housing authority has either refused to grant a licence under Part 2 or 3 of the Act or has revoked a licence.
   iv which has been the subject of an interim or final management order under the Housing Act 2004.

e. A change of property ownership.

f. A change of address or contact details, including country of residency.

g. A change of manager or management arrangements, a signed copy of the new managing agent contract must be submitted within 14 days of instructing the new agent.

h. Any proposed changes to the HMO, including its layout, that would affect the licence or licence conditions.

i. Any proposed changes to the HMO, including its occupancy, that would affect the licence or licence conditions (e.g. Occupation under a Home Office Contract, or Conversion to House in Multiple Occupation)

20.2 This licence remains in force even if the premise is no longer a licensable property unless a valid application is made for the licence to be revoked under section 93 Housing Act 2004.

21. General Conditions

The Licence Holder must;

21.1 Take all reasonable steps to arrange for access to the HMO, to be granted to Authority officers when requested, at any reasonable time. They must not impede Authority officers in carrying out their statutory duties including inspecting, surveying and investigating the HMO to ensure compliance with licence conditions and any other relevant legislation.

21.2 Provide to the Authority, within 7 days on demand, the following particulars as may be specified in the notice with respect to the occupancy of the HMO:

a. The names and numbers of individuals and households in occupation specifying the rooms they occupy within the HMO.
b. The names and number of individuals in each household.

Limitations of Licence

LICENCE TRANSFER - This licence **cannot** be transferred to another person or organisation or property.

COMPANIES AND PARTNERSHIPS - If the Licence Holder is a company or partnership and it is dissolved while the licence is in force, the licence ceases to be in force on the date of dissolution.

PENALTY FOR BREACH OF LICENCE CONDITIONS- Failure to comply with any of the above licence conditions may result in enforcement action and/or prosecution.

On conviction, a Court may impose an UNLIMITED fine for each breach of these licence conditions. Alternatively, the Authority may impose a financial penalty of up to £30,000 for each licence condition breach.

Other Statutory and Legal Requirements

PLANNING PERMISSION - This licence does **NOT** grant any planning approvals, consents or permissions under the Town and Country Planning Act 1990 or any related planning legislation, retrospectively or otherwise. If the property is being used as a House in Multiple Occupation (HMO) this may constitute a breach of planning control and you should check the Authority's website to ensure the correct planning permissions are in place. https://www.havering.gov.uk/information-landlords/landlord-licensing-private-rented-properties This licence does not offer any protection against enforcement action taken by the Planning Department. If you are unclear on the matters outlined above, you should seek professional planning advice.

BUILDING CONTROL- This licence does **NOT** grant any Building Control (Development Control) approvals, consents or permissions, retrospectively or otherwise. This licence does **NOT** offer any protection or excuse against enforcement action taken by the Building Control (Development Control) Department.

PROPERTY CONDITION - This licence is **NOT** evidence that the property is safe or free from hazards and defects. The licence does not offer any protection against criminal or civil legal action being taken against the Licence Holder, or anyone else with an interest in the property, in respect of any hazards, nuisances or any other problems discovered in relation to the condition of the property.

CONSUMER RIGHTS & UNFAIR PRACTICES – The Licence Holder's attention is drawn to the Unfair Contract Terms Guidance (CMA37) regarding unfair contract terms in relation to their tenancies or licences. https://www.gov.uk/government/publications/unfair-contract-terms-cma37

The Licence Holder must also negotiate agreements in good faith and must not engage in misleading or aggressive commercial practices. Further details can be found in the Consumer Protection from Unfair Trading Regulations Guidance (OFT1008) https://assets.publishing.service.gov.uk/media/5a74d389e5274a3cb28677f4/oft1008.pdf

It is not the responsibility of the Authority's Property Licensing Team to ensure the Licence Holder has complied with the above statutory requirements. If you are unclear on any of the matters outlined above, you should seek professional advice.

PROSECUTION/ CONTRAVENTIONS CONSEQUENCES - Please note that any prosecutions or enforcement action or legal action taken against the Licence Holder or anyone associated with Licence Holder, or the management of the property, may affect the Licence Holder's 'fit and proper' status. The Authority can revoke or vary the licence at any time, giving proper statutory notice.

Any requirements relating to the licence and conditions are without prejudice to assessments and appropriate actions including enforcement actions under the Housing Act 2004. This includes actions to deal with category 1 and category 2 hazards as may be identified under the Housing Health and Safety Rating System (HHSRS) and does not preclude such action.

Selective Licensing Licence Conditions

Standard conditions for licences granted under Part 3 Housing Act 2004

NOTES

1. Definitions

In these licence conditions:

a. *"House"* refers to the building or such part of it as is licensed under Part 3 of the Housing Act 2004.

b. *"Authority"* refers to the local authority, namely the London Borough of Havering.

c. "*Licence Holder*" refers to: (a) the person to whom the Authority has granted this licence; and (b) from the date of his or her consent, any other person who agrees to comply with the licence restrictions and obligations that follow.

2. The following are standard conditions that will be attached to each licence. In some circumstances, where the Council believes there are specific issues not covered in the standard conditions for a particular property, additional or more specific conditions will be added.

The person to whom this licence is granted is responsible for ensuring compliance with its conditions at all times and remains so whether or not another person has also agreed to be bound by them.

1. Permitted occupation

1.1 **The maximum occupancy for this property is one household OR two people in two households.**

2. Tenancy agreement

The Licence Holder must;

2.1 **Ensure that all occupants of the house and each of them are provided with a written statement of the terms and conditions on which they occupy it, e.g. a tenancy or licence agreement.**

2.2 Retain copies of any such written statement(s) throughout any occupier's occupation and must provide the Authority with a copy of any such statement or statements within 21 days, on demand.

3. References

The Licence Holder must;

3.1 **Ensure that references are demanded from persons who wish to occupy the house.**

3.2 No new occupiers shall be allowed to occupy the house if they are unable to provide suitable references. (References should be as a minimum, checks to ensure the tenants identity, whether they have the right to rent a property their ability to pay rent and their past history as a tenant) [see https://www.gov.uk/check-tenant-right-to-rent-documents/who-to-check]

3.3 **Ensure that copies of obtained references are retained for the duration of the licence and that the Authority is provided with a copy of any such references and records within 21 days, on demand.**

4. Gas safety

Where gas is supplied to the house, the Licence Holder must;

4.1 **Produce to the Authority annually for their inspection a gas safety certificate obtained in respect of the house within the last 12 months.**

4.2 Provide the Authority with a copy of the gas safety certificate within 7 days, on demand.

4.3 Copies of the gas safety certificate must also be provided to all occupiers at the start of their occupation at the beginning of their tenancy/occupancy and within 28 days of all subsequent annual gas safety checks during the term of occupation. A written record that this has been provided must be kept and provided to the Authority within 21 days, on demand.

5. Electrical safety

The Licence Holder must;

5.1 **Keep all electrical appliances made available by them in the house in a safe condition and provide the Authority with a declaration as to the safety of such appliance within 21 days on demand.**

5.2 **Ensure that every electrical installation in the house is in proper working order and safe for continued use; and provide the Authority with a declaration as to the safety of such installations within 7 days on demand. For the purpose of this condition "electrical installation" has the meaning given in regulation 2(1) of the Building Regulations 2010.**

6. Furniture safety

The Licence Holder must;

6.1 **Keep all furniture made available by them in the house in a safe condition and provide the Authority with a declaration as to the safety of such furniture within 21 days on demand.**

6.2 All upholstered furniture and mattresses supplied by the Licence Holder must comply with the requirements of The Furniture and Furnishings (Fire) (Safety) Regulations 1988.

7. Smoke alarms

The Licence Holder must;

7.1 **Ensure that a smoke alarm is installed on each storey of the house on which there is a room used wholly or partly as living accommodation (including a bathroom, lavatory, hall or landing). For the purpose of this condition a bathroom or lavatory is to be treated as a room used as living accommodation.**

7.2 **Ensure each installed smoke alarm is kept in proper working order.**

7.3 **Provide to the Authority, within 21 days on demand, with a declaration by them as to the condition and positioning of any smoke alarm.**

7.4 Ensure that at the start of every tenancy all smoke alarms are tested and are in proper working order.

8. Carbon monoxide alarms

The Licence Holder must;

8.1 **Ensure that a carbon monoxide alarm is installed in any room in the house which is used wholly or partly as living accommodation and contains a fixed combustion appliance, other than a gas cooker. For the purpose of this condition "room" includes halls and landings; and bathrooms and lavatories are treated as rooms used as living accommodation.**

8.2 **Ensure that any such alarm is kept in proper working order.**

8.3 **Provide the Authority, within 21 days on demand, a declaration by them as to the condition and positioning of any such alarm or alarms.**

8.4 Ensure that at the start of every tenancy all carbon monoxide alarms are tested and are in proper working order.

9. Property management and safety

The Licence Holder must ensure;

9.1 That prompt action is taken to investigate and effectively address reports of disrepair or pest infestation at the house. The Licence Holder must ensure, in particular, that a written response is made to any such report within 21 days of receipt, stating the action that has been or will be taken.

9.2 Copies of any such written report (including by email) and the response referred to in condition 9.1 must be provided to the Authority within 21 days on demand.

9.3 That any repairs, improvement works, or treatments at the house are carried out by competent person(s). These persons(s) may be employed directly by the Licence Holder, an agent/employee of the Licence Holder, or a third-party contractor appointed by the Licence Holder or their agent. Copies of receipts and/or invoices for any such works must be provided to the Authority within 21 days on demand.

9.4 That they or anyone acting on their behalf (e.g. a managing agent or contractor) give the tenant or occupier at least 24 hours' written notice of their intention to enter the house and specify the reasons why entry is required. The exception to this is when it would not be reasonable to give such notice and access is urgent, for example in an emergency.

9.5 That the occupiers of the house are given the following information in writing about waste and recycling within 21 days of the start of their occupation:

I. The collection days for the refuse and recycling bins for the house https://www.havering.gov.uk/rubbish-recycling/check-collection-day

II. Details on what they can and can't recycle https://havering-self.achieveservice.com/service/LBH_Rubbish_and_recycling___What_goes_where_guide

III. How they can dispose of bulky waste https://www.havering.gov.uk/rubbish-recycling/bulky-collections

9.6 A copy of the information provided to the occupiers in relation to condition 9.5 must be kept for the duration of the tenancy plus six months and provided to the Authority within 21 days on demand.

9.7 That tenants are provided with adequate facilities for the disposal of refuse and recycling. The Licence Holder must ensure that there are suitable and appropriate receptacles for the storage of household refuse and recycling between collections, so that bags or loose refuse and recycling are not stored outside the house.

9.8 Regular checks at intervals of no longer than six months are carried out to ensure that the house, gardens and yards within the curtilage of the house, are free from waste, which could provide harbourage for pests and/or is a nuisance and/or is detrimental to the local amenities, other than waste stored in appropriate receptacles for the storage of household refuse and recycling; and that waste such as old furniture, bedding, rubbish or refuse from the house is not left outside the property or in its vicinity.

9.9 Any waste generated during building work or during change of tenancy (for example old furniture or bedding) from the house is not left on, or immediately outside, the house or private land and is disposed of in a safe and lawful manner.

9.10 If they become aware that the occupiers of the house or their visitors are not using the waste disposal facilities provided and/or leaving waste outside the house or in its vicinity (for example old furniture, mattresses), they must ensure that a warning letter is sent to the occupiers within 21 days advising them to remove the items immediately. A copy must be kept and must be provided to the Authority within 21 days on demand.

9.11 Actively respond to complaints of poor waste practices associated with the property and must keep a record of the action taken and this must be provided to the Authority within 21 days on demand.

9.12 Ensure that regular checks at intervals of no longer than 6 months are carried out to ensure that the house is free from pest infestation. Where the

Licence Holder becomes aware of a pest problem or infestation at the house they shall, within 21 days, take steps to ensure that a treatment program is carried out to eradicate the pest infestation. Records shall be kept of such treatment programs and copies of these must be provided to the Authority within 21 days on demand.

9.13 Ensure that tenants have the means by which to keep all outhouses, garages, sheds, cellars and vaults are kept secure and are used for their intended purpose only. The Licence Holder must ensure that these structures are not used for human habitation.

9.14 Ensure that the exterior of the house is kept clean and tidy and that issues of routine maintenance affecting the exterior, such as broken windows, are addressed promptly.

10. Material changes of circumstance

The Licence Holder must;

10.1 Notify the Authority within 21 working days of any material changes in their own circumstances and, within 21 days of becoming aware of them, of any known and material change in the circumstances of any person managing or involved in the management of the house that may require the licence to be varied, revoked or require a fit and proper person check to be made, including:

a. Details of any unspent convictions not previously disclosed to the Authority that may be relevant to the Licence Holder or the property manager or the status of either of them as a ‘fit and proper person’, including in particular a conviction in respect of any offence involving fraud or dishonesty, violence, drugs or any offence listed in Schedule 3 to the Sexual Offences Act 2003.

b. Details of any finding by a court or tribunal against the Licence Holder and/or the property manager that he or she has practised unlawful discrimination.

c. Details of any contravention on the part of the Licence Holder or property manager relating to housing, public health, environmental health, or landlord and tenant law, which has led to civil or criminal proceedings and a judgment or finding being made against him or her.

d. Information about any property the Licence Holder or property manager owns or manages, or has owned or managed:

i which has been made subject to a control order under section 379 of the Housing Act 1985, in the five years preceding the date of the application; or

ii which has been the subject of any enforcement action described under Part 1 sections 5(2) or 7(2) of the Housing Act 2004, concerning Category 1 and Category 2 housing condition hazards; or

iii in relation to which a local housing authority has either refused to grant a licence under Part 2 or 3 of the Act or has revoked a licence.

iv which has been the subject of an interim or final management order under the Housing Act 2004.

e. A change of property manager.

f. A change of address of the Licence Holder or property manager.

g. The undertaking of any substantial works to the house including conversions and modernisations that would affect the licence or the licence conditions.

11. Managers' responsibility for compliance with licence conditions

11.1 If the Licence Holder appoints a person to manage the house during the period of the licence, before or upon the manager's appointment, they must obtain from the manager a written declaration identifying the licence conditions, above and below, if any, by which he or she agrees to be bound.

11.2 The declaration must include:

i A recital that the manager has read and understood the licence conditions;
ii A notice informing the manager that a failure to comply with the conditions may result in criminal and/or civil liability, including an unlimited fine or a financial penalty of up to £30,000 for each breach;
iii A notice that, if the manager requires advice about the conditions or any failure to comply with them, he or she should consult a Citizens Advice Bureau or a housing solicitor, before signing the declaration;
iv A recital that the manager understands the consequences of failing to comply with the licence conditions;

v A recital that either (a) the manager agrees to be bound by all of the licence conditions, above and below, (b) the manager agrees to be bound by such of the conditions as the declaration specifies or (c) a recital that the manager does not agree to be bound by any of the licence conditions, above or below; and

vi In the case of (b) or (c) above, a statement that the person to whom the licence was granted alone is bound by the licence conditions;

11.3 Ensure that the aforementioned declaration is signed and dated by the appointed manager; and

11.4 A copy of this declaration must be kept throughout the licence period and must be provided to the Authority within 21 days on demand.

12. Tenancy management

The Licence Holder must;

12.1 On commencement of a new tenancy provide the following prescribed information to their tenant:

- A copy of this licence (or display a copy within a communal area of the property).
- Energy performance certificate (The rating of the EPC must meet the current version of the Minimum Energy Efficiency Standards Regulations at the time of letting unless exempt)
- A valid gas safety certificate
- A copy of the Government '"How to rent: the checklist for renting in England".

12.2 Ensure that occupants of the house receive written notice about how they should deal with repair and maintenance issues and with emergencies, should they arise, including an emergency telephone number. Copies of the written notice must be provided to the Authority within 21 days upon demand.

12.3 Not cause or permit any person who has previously applied for a property licence in respect of the house and has either:

a. been found not to be a Fit and Proper person, or
b. been made subject to a Banning Order under the Housing and Planning Act 2016

to have control or management of the house, or to carry out or arrange any repair, improvement or other building works at the house.

12.4 Ensure that any deposit taken under an assured shorthold tenancy is protected by placing it in an authorised tenancy deposit scheme. The tenant must be given the prescribed information about the scheme. The Licence Holder must ensure compliance with the requirements of the scheme and the operation of Part 6 in Chapter 4, Housing Act 2004 within the statutory time limit (currently 30 days). A copy of the prescribed information given must be provided to the Authority within 21 days on demand.

12.5 Ensure that inspections of the house are carried out at least every six months to identify any problems relating to the condition and management of the house. The Authority may increase the frequency of such inspections if it has good reason to be concerned about the condition or management of the house. The records of such inspections shall be kept for the duration of this licence. As a minimum requirement the records must contain a log of who carried out the inspection, date and time of inspection and issues found, and action(s) taken. Copies of these must be provided to the Authority within 21 days on demand.

12.6 Ensure that if an occupant misses a rent payment, they are contacted to ascertain whether he or she still occupies the house; and must ensure that a record of any such contact is kept. If no such contact is or can be made, the licence holder must ensure that the house is visited, no later than one month after the date on which the payment became due, to ensure that the house is secure and has not been abandoned.

12.7 If previous occupants have not surrendered keys to the house door, or to the doors of dwellings within the house, the Licence Holder must ensure that the relevant locks are changed, before new occupants move in.

12.8 Ensure that all tenants can access and obtain readings of the utility meters (gas, electricity and water, as applicable) for the property at reasonable times (no less than the delivery frequency of the utility bills) during the course of the tenancy and a final reading at the termination of the tenancy.

13. Financial management

13.1 When rent or licence fees are collected or received in cash from the occupiers, a written rent receipt must be given to the occupiers, within 21 days of receiving the rent. (This can be an email or written invoice confirming to the tenant, the date and amount paid). Copies of the rent receipts and records must be provided to the Authority within 21 days on demand.

14. Measures to address anti-social behaviour [ASB]

14.1 The Licence Holder must ensure that all reasonable and practicable steps are taken to prevent and deal effectively with ASB resulting from the conduct

of occupiers of, or visitors to, the house and must comply with the requirements of paragraphs (a) to (g) below (If the Licence Holder has an agent it is still the Licence Holder's responsibility to ensure their agent acts on their behalf in compliance of the conditions):

a. If the Licence Holder receives a complaint from any person or organisation (including the Authority) regarding ASB involving the occupiers of or visitors to the house, the Licence Holder must ensure that the occupiers are contacted within 21 days of receiving the complaint. The Licence Holder must ensure that the occupiers are informed in writing of the allegations of the ASB and of the consequences of its continuation.

b. If reports of ASB persist after 28 days from the receipt of the initial complaint, the Licence Holder must either visit the house within 21 days or ensure that it is so visited by the person managing the house.

c. If the Licence Holder is informed by the Authority, police or other organisation that any occupiers have entered into a Community Resolution; or have been issued with an Acceptable Behaviour Contract; or a civil injunction has been obtained against the occupiers; or if the occupiers have been prosecuted in relation to ASB, the Licence Holder must either visit the house within 21 days of being notified or ensure that it is visited by the person managing the house.

d. During the visit referenced in b) or c) above, the Licence Holder must ensure that the occupiers are provided with a warning letter advising them (amongst other things) that their behaviour is not acceptable, that they are responsible for the conduct of their visitors, the impact on the victims and local community, and of the consequences of its continuation.

e. Any letters, emails, legal notices or other documents relating to ASB, which are sent or received by the Licence Holder, or the agent on behalf of the Licence Holder, must be copied and kept for five years by the Licence Holder.

f. Where the Licence Holder has reasonable grounds to suspect that the ASB involves criminal activity the Licence Holder must ensure that the appropriate authorities are informed.

g. The Licence Holder shall co-operate with the police and Authority in resolving ASB in any licensed property under their control. Such cooperation includes attending or being represented at any case

conferences or multiagency meetings and providing information to the police or the Authority when requested.

h. Any correspondence, letters and records referred to in conditions 40 (a) to (f) must be provided by the Licence Holder to the Authority within 21 days on demand.

15. General conditions

The Licence Holder must;

15.1 Have in place suitable emergency management arrangements in the event of their absence.

15.2 Take all reasonable steps to arrange for access, to be granted to Authority officers when requested, at any reasonable time. They must not impede Authority officers in carrying out their statutory duties including inspecting, surveying, and investigating the house to ensure compliance with licence conditions and any other relevant legislation.

15.3 Provide the Authority, within 21 days of receiving a written notice, with the names and number of individuals in each household.

15.4 Ensure that if any alteration or construction works are in progress, works are carried out at the house are carried out in such a manner as to ensure the safety of all persons occupying or visiting the house in compliance with health and safety legislation.

15.5 Ensure that on completion of any works, the house is left in a clean and tidy condition and free from builders' debris.

Limitations of licence

LICENCE TRANSFER - This licence **cannot** be transferred to another person or organisation or property.

COMPANIES AND PARTNERSHIPS - If the Licence Holder is a company or partnership and it is dissolved while the licence is in force, the licence ceases to be in force on the date of dissolution.

PENALTY FOR BREACH OF LICENCE CONDITIONS - Failure to comply with any of the above licence conditions may result in enforcement action and/or prosecution.

On conviction, a court may impose an UNLIMITED fine for each breach of these licence conditions. Alternatively, the Authority may impose a financial penalty of up to £30,000 for each licence condition breach.

Other statutory and legal requirements

PLANNING PERMISSION - This licence does **NOT** grant any planning approvals, consents or permissions under the Town and Country Planning Act 1990 or any related planning legislation, retrospectively or otherwise. If the property is being used as a House in Multiple Occupation (HMO) this may constitute a breach of planning control and you should check the Authority's website to ensure the correct planning permissions are in place. https://www.havering.gov.uk/information-landlords/landlord-licensing-private-rented-properties. This licence does not offer any protection against enforcement action taken by the Planning Department. If you are unclear on the matters outlined above, you should seek professional planning advice.

BUILDING CONTROL- This licence does **NOT** grant any building control (Development Control) approvals, consents or permissions, retrospectively or otherwise. This licence does **NOT** offer any protection or excuse against enforcement action taken by the Building Control (Development Control) Department.

PROPERTY CONDITION - This licence is **NOT** evidence that the property is safe or free from hazards and defects. The licence does not offer any protection against criminal or civil legal action being taken against the Licence Holder, or anyone else with an interest in the property, in respect of any hazards, nuisances or any other problems discovered in relation to the condition of the property.

CONSUMER RIGHTS & UNFAIR PRACTICES – The Licence Holder's attention is drawn to the Unfair Contract Terms Guidance (CMA37) regarding unfair contract terms in relation to their tenancies or licences. https://www.gov.uk/government/publications/unfair-contract-terms-cma37

The Licence Holder must also negotiate agreements in good faith and must not engage in misleading or aggressive commercial practices. Further details can be found in the Consumer Protection from Unfair Trading Regulations Guidance (OFT1008) https://assets.publishing.service.gov.uk/media/5a74d389e5274a3cb28677f4/oft1008.pdf

It is not the responsibility of the authority's Property Licensing Team to ensure the Licence Holder has complied with the above statutory requirements. If you are unclear on any of the matters outlined above, you should seek professional advice.

PROSECUTION/ CONTRAVENTIONS CONSEQUENCES - Please note that any prosecutions or enforcement action or legal action taken against the Licence Holder or anyone associated with Licence Holder, or the management of the property, may affect the Licence Holder's 'fit and proper' status. The Authority can revoke or vary the licence at any time, giving proper statutory notice.

Any requirements relating to the licence and conditions are without prejudice to assessments and appropriate actions including enforcement actions under the Housing Act 2004. This includes actions to deal with category 1 and category 2 hazards as may be identified under the Housing Health and Safety Rating System (HHSRS) and does not preclude such action.

Havering Property Licensing

Schedule of Fees, Charges and Discounts

1. Payment of fees

1.1. The licence fee is payable in two parts.

1.2. Part A will be payable on submission of the application and will cover the cost of processing and the administration in determining the eligibility of the application. Should the application be refused or rejected by the Council or withdrawn by the applicant this first Part A payment will not be refunded.

1.3. Part B will be payable once the application has been assessed and the decision is made to grant the licence. This will cover the administration, management, and enforcement of the licensing functions for the scheme.

1.4. The final licence will not be issued until the full fee has been paid.

2. Licence fees

Licence type	Part A	Part B	Total fee
Selective	£570	£380	£950
Additional HMO	£840	£560	£1400

3. Discounts

Nature of discount	Amount (Selective)	Amount (Additional)
EPC rating C and above	£75 off Part B	£75 off Part B
Accredited landlord	£100 off Part B	£100 off Part B
Multi-dwelling	£100 off Part A	£100 off Part A

3.1. The table below shows discounts and their effect on the total **selective** licence fee payable.

Selective Licence Discount	Description	Discount	Part A	Part B	Total payment after discount
EPC	Properties must have an EPC rating of C or above	£75 (off Part B)	£570	£305	£875
Accredited Landlord	Landlords accredited or members of specified schemes (Refer to 3.3 below)	£100 (off Part B)	£570	£280	£850
Multi-dwelling	Applicable where multiple properties are: a. In common ownership and management control. b. Contiguous with each other in the same block or building. c. All applications are made at the same time.	£100 (off Part A) Part A fee will be payable at the full rate for the first flat. Discount will be applied in respect of applications relating to the 2nd, 3rd properties etc.	£470	£380	£850

3.2. The table below shows discounts and their effect on the total **additional HMO** licence fee payable.

Additional HMO Licence Discount	Description	Discount	Part A	Part B	Total payment after discount
EPC	Properties must have an EPC rating of C or above	£75 (off Part B)	£840	£485	£1325
Accredited Landlord	Landlords accredited or members of specified schemes (Refer to 3.3 below)	£100 (off Part B)	£840	£460	£1300
Multi-dwelling	Applicable where multiple properties are: a. In common ownership and management control. b. Contiguous with each other in the same block or building c. All applications are made at the same time.	£100 (off Part A) Part A fee will be payable at the full rate for the first flat. Discount will be applied in respect of applications relating to the 2nd, 3rd properties etc.	£740	£560	£1300

3.3. Accredited Landlords

If you are **accredited** under one of the following schemes, you may be entitled to a £100 discount (from Part B payment):

- London Landlord Accreditation Scheme (LLAS)
- National Residential Landlords Association (NRLA)
- UK Association of Letting Agents (UKALA)

If you are a **member** of one of the following schemes, you may be entitled to a £100 discount (from Part B payment):

- Association of Residential Letting Agents (ARLA)
- Royal Institution of Chartered Surveyors (RICS)
- Safeagent

3.4. Discounts will be determined on receipt of full application and all supporting documents.

3.5. Discounts **will not** be applicable where the Council has:

- made two requests for additional supporting documents, or
- served a warning letter for failure to license the property.

3.6. Refer to **section 6** for 'Discounts applied - practical examples'

4. Licence variation fees

Action	Applicable fee
Change of licence holder's address	None
Change of manager's address	None
Change/appointment of manager (unless they are also the licence holder)	None
Change of name (marriage/divorce/deed poll)	None
Change in amenities	None
Reduction in the number of maximum occupiers and/or households for licensing purposes	None

5. Other fees and charges

Action	Applicable fee
Change of licence holder	New application fee
Revocation of licence	None
Application to licence following revocation of licence	New application fee
Application refused or rejected by the Council	Part A payment
Application withdrawn by the applicant	Part A payment
Temporary exemption notice (TEN) made by the Council	None
Application received following the expiry of a TEN made by the Council	New application fee
Additional fee for processing paper applications	£117.10

6. Discounts applied: practical examples

The examples below illustrate the calculation of the total amount payable after discounts are applied, using a selective licence fee of **£950 (£570 for Part A; £380 for Part B)**.

The same principles will apply when calculating the total additional HMO licence fee after any discounts have been applied.

Key	Nature of discount	Amount (Selective)	Amount (Additional)
EPC	EPC rating C or above	£75 off Part B	£75 off Part B
ACLL	Accredited landlord	£100 off Part B	£100 off Part B
MD	Multi-dwelling	£100 off Part A	£100 off Part A

6.1. Scenario A

An EPC discount is applicable for applications for properties that hold an EPC rating of B or above.

Scenario A	Property	Discount	Part A	Part B	Total fee
Landlord applies for a licence for one property. The property has an EPC rating of C	1	Part B reduced by £75 (£75 EPC)	£570	£305	**£875**
		Total	**£570**	**£305**	**£875**

6.2. Scenario B

Applicants may also apply for EPC and accredited landlord discounts where applicable. Refer to Scenario B below.

Scenario B	Property	Discount	Part A	Part B	Total fee
Landlord is accredited. The landlord has three properties. Each property is in a different part of the designated area. Properties 1 and 2 have an EPC rating of D. Property 3 has an EPC rating of C.	1	Part B reduced by £100 (£100 ACLL)	£570	£280	**£850**
	2	Part B reduced by £100 (£100 ACLL)	£570	£280	**£850**
	3	Part B reduced by £175 (£100 ACLL) + (£75 EPC)	£570	£205	**£775**
		Total	**£1710**	**£765**	**£2475**

6.3. Scenario C

Applicants may also apply for a multi-dwelling discount where multiple properties in the same building are owned and under the control of the same person. A multi-dwelling discount will be applied in respect of applications relating to the 2nd, 3rd properties etc.

Scenario C	Property	Discount	Part A	Part B	Total fee
Landlord is accredited. The landlord has four flats in a building converted into self-contained flats. Properties 1 and 2 have an EPC rating of D. Properties 3 and 4 have an EPC rating of C.	1	Part B reduced by £100 (£100 ACLL)	£570	£280	**£850**
	2	Part A reduced by £100 (£100 MD) Part B reduced by £100 (£100 ACLL)	£470	£280	**£750**
	3	Part A reduced by £100 (£100 MD) Part B reduced by £175 (£100 ACLL) + (£75 EPC)	£470	£205	**£675**
	4	Part A reduced by £100 (£100 MD) Part B reduced by £175 (£100 ACLL) + (£75 EPC)	£470	£205	**£675**
		Total	**£1980**	**£970**	**£2950**

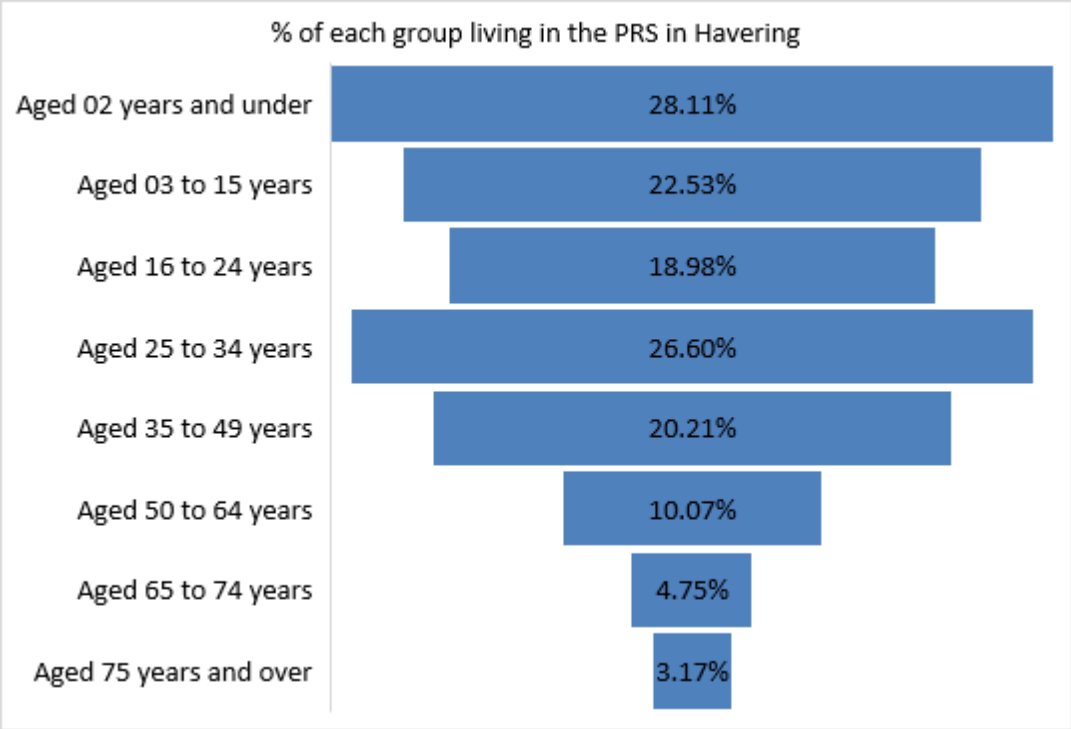
Title Introduction of Private Rented Sector Additional HMO and Selective Licensing Schemes | **Ref: XXXXXXX | Submitted: X/10/2025**

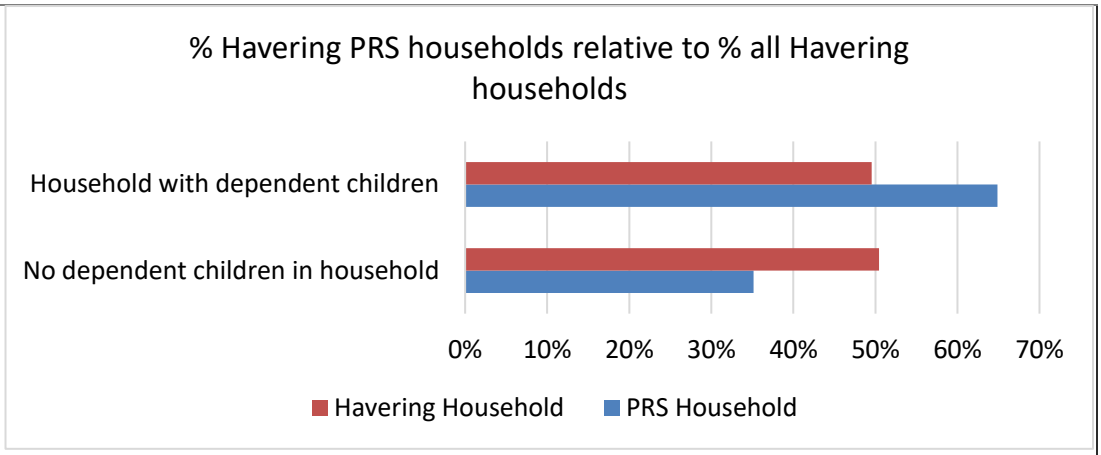
i-Decision

Introduction	
Type of request	EQHIA
Title	Introduction of Private Rented Sector Additional HMO and Selective Licensing Schemes
Directorate	Places
Project Manager/Responsible Officer	Michelle Hammond
Project Manager/Responsible Officer Email	Michelle.Hammond@havering.gov.uk
Conducted on	X/10/2025
Name	Anand Punj
Email	anand.punj@havering.gov.uk

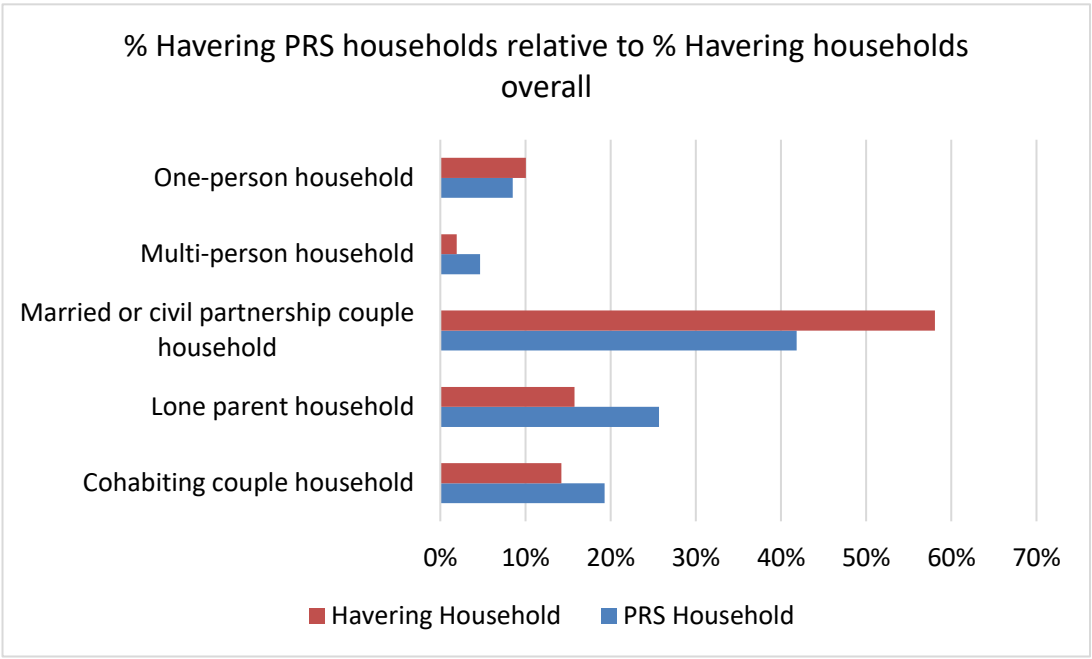
EQHIA	
Type of activity	Project
Manager name	Helen Oakerbee
Manager job title	Director of Planning & Public Protection, Planning & Public Protection
Manager service/directorate	Planning & Public Protection
Have you sought advice from the Corporate Policy & Diversity team and/or Public Health team	No

Reason for EQHIA	**Changing, introducing a new, or removing a service, policy strategy or function, Does the activity have the potential to impact (either positively or negatively upon any factors which determine people's health and wellbeing**

There is impact on age	Census 2021 data shows that the highest proportions of Havering residents who inhabit the PRS are those aged 2 and under, followed by residents between the ages of 25 and 34. • Children aged 14 and under account for more than 20% of the total number of Havering residents living in the PRS. • Nearly 30% of children who are aged 2 and under in Havering inhabit the PRS. • Another large proportion of Havering residents who privately rent (nearly 27%) are aged between 25 and 34 years old (the parents of those young children presumably being partially among that demographic). • Owner-occupation gradually rises as residents surpass the age of 34, with those residents aged 75 and over being least likely to inhabit Havering's PRS (with only about 3% of that demographic privately renting).  The Council also considered it relevant (within the equality analysis for 'age') to compare living arrangements and prevalence of dependent children in Havering's PRS with the borough as a whole: • Households with dependent children are overrepresented in Havering's PRS at 65% (compared with 50% of all households in the borough)



- PRS households in Havering display differences with the wider borough in terms of living arrangements, with married couples underrepresented and multi-person, lone parent and cohabitating households overrepresented.



This indicates that younger people and multi-person households might be affected to a greater extent by the introduction of the proposed licensing schemes, which is intended to improve conditions in the private rented sector. Despite this prevalence, we are finding the numbers of older people and families renting from a private landlord are growing as a result of the growing unaffordability of owner-occupation and inaccessibility of social housing.

As the cost-of-living crisis continues, it is likely that many households with children will be unable to afford to put the heating on, making homes more susceptible to damp, mould and cold. Children aged 14 years or under are at the greatest risk of ill health caused by damp and mould in their homes.

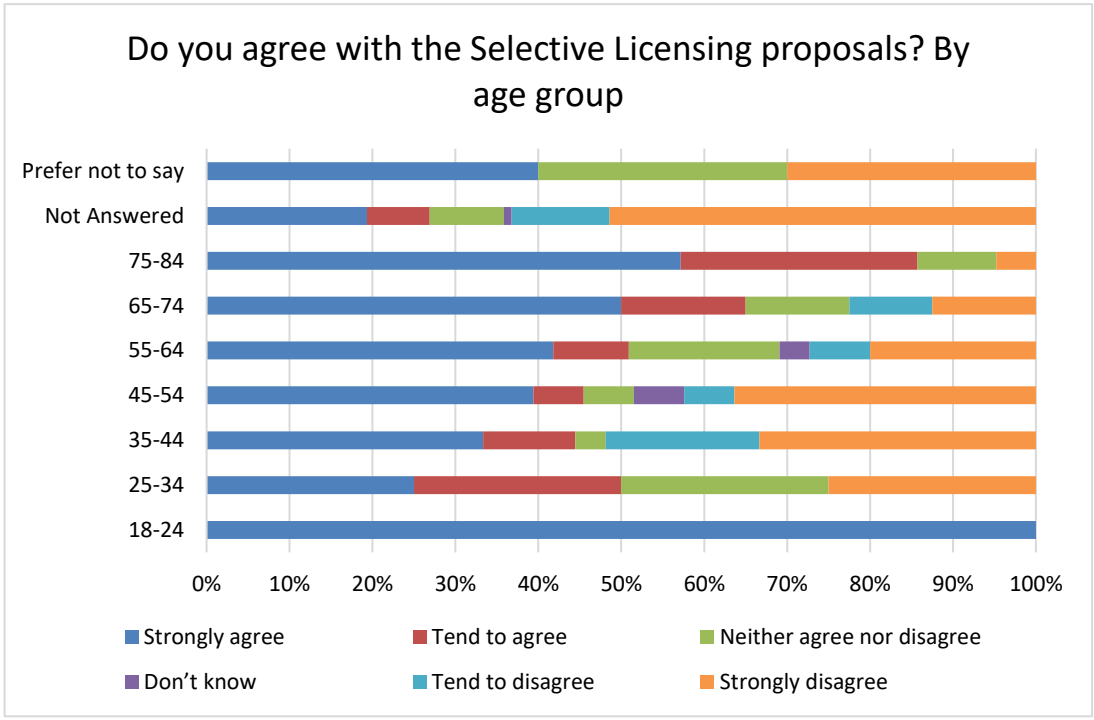
Child poverty AHC was 28% in Havering for 2020-21. The average for London in the equivalent period was 35.2%. Increasingly, families with young children are living in the PRS, with whole families sometimes renting a single room in an unlicensed property in substandard conditions. Students and young professionals, who can be exploited in the current rental market, also tend to live the private rented sector.

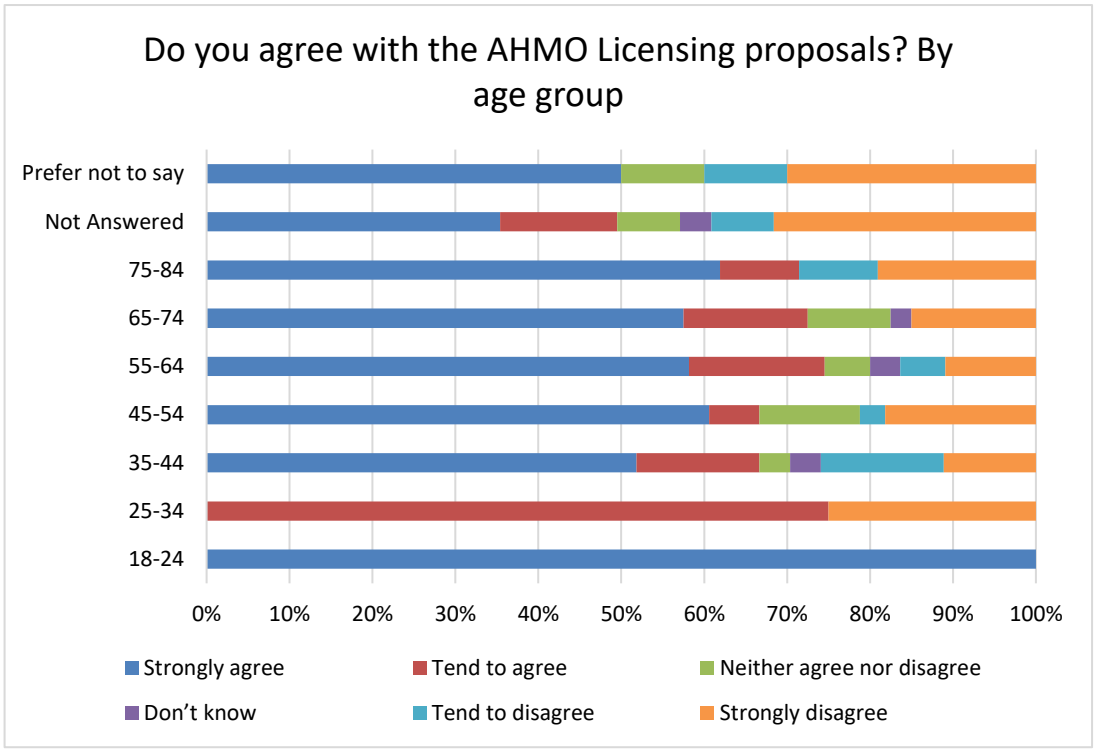
Effective regulation of the PRS, leading to an improvement in housing standards has the potential to benefit tenants as well as the wider community. We know that some health hazards are considered to be particularly serious for young people so this group would particularly benefit from the better regulation of the sector.

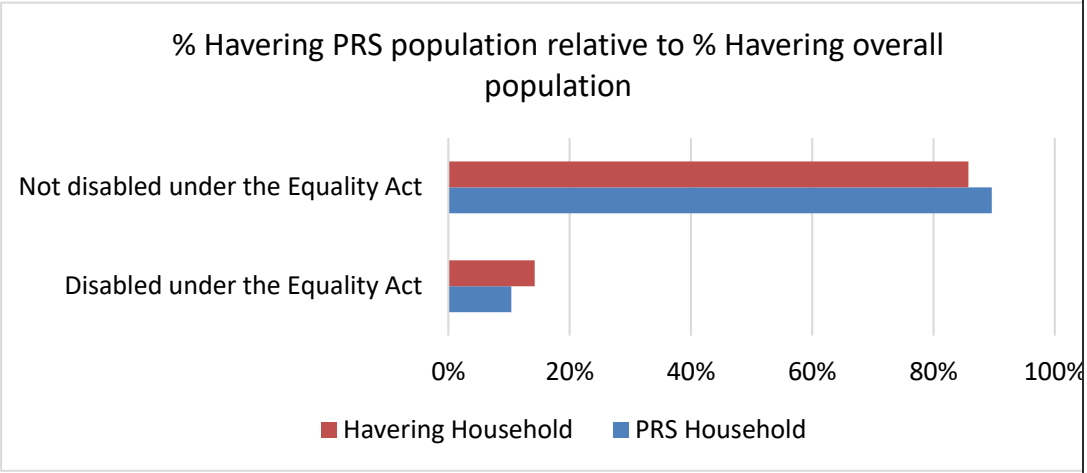
Respondents to the questionnaire

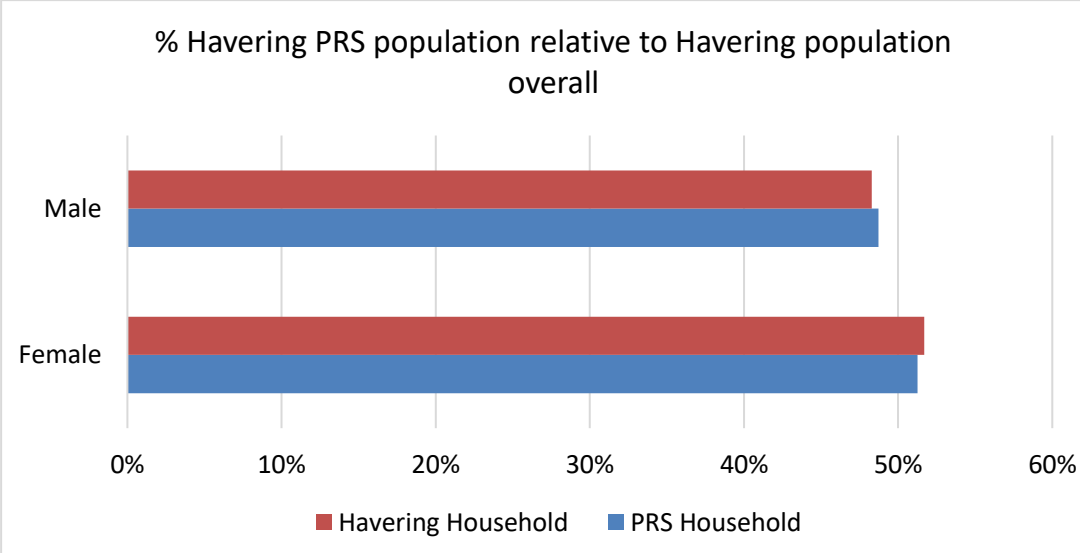
Compared to the Census data 2021 for adult population of the borough, younger residents (up to the age of 34) were underrepresented, whereas those over the age of 35 were more accurately represented in the consultation data.

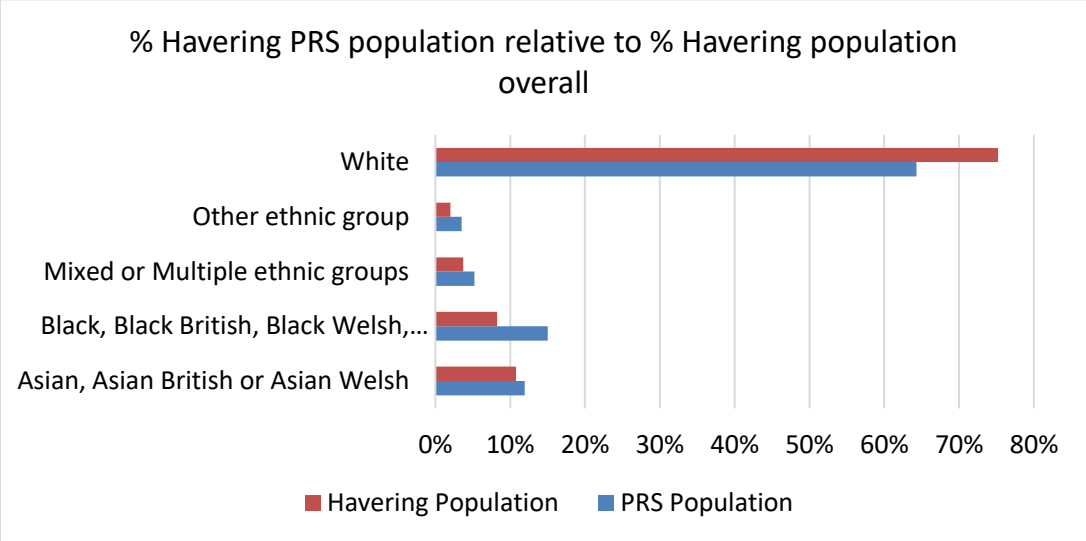
Respondents across most age groups were largely in favour of the proposals, though there was more disagreement among some older age groups (who are less likely to be privately renting than younger residents).

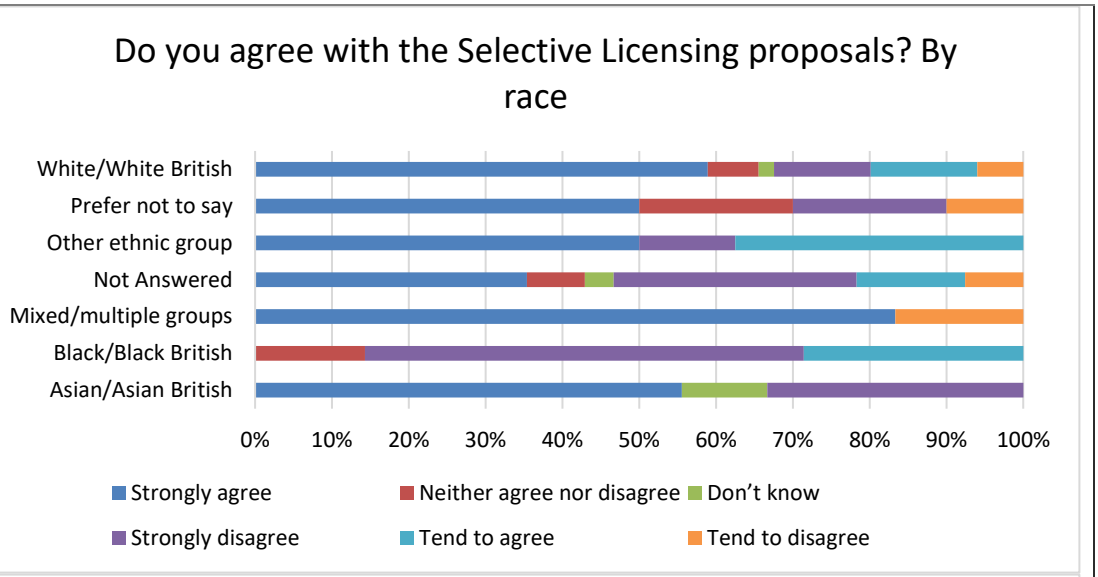


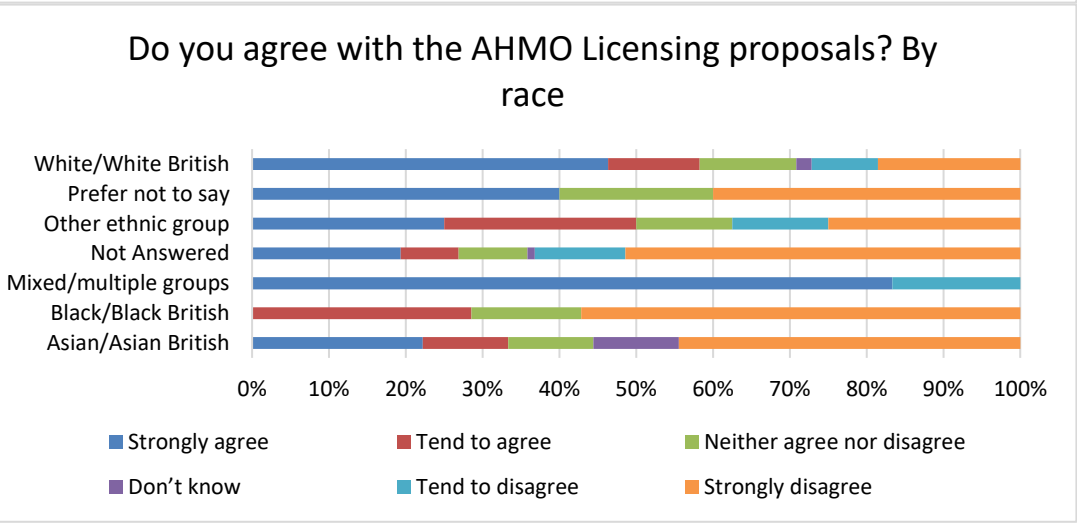

Do you agree with the AHMO Licensing proposals? By age group
Prefer not to say
Not Answered
75-84
65-74
55-64
45-54
35-44
25-34
18-24
0%
10%
20%
30%
40%
50%
60%
70%
80%
90%
100%
Strongly agree
Tend to agree
Neither agree nor disagree
Don't know
Tend to disagree
Strongly disagree

There is an impact on disability	According to Census 2021 data, residents who are disabled under the Equality Act are slightly underrepresented in Havering's PRS (10% compared to 14% of the borough's overall population).  People with disabilities may find themselves in the position of renting within the PRS. Unsuitable housing has a severe impact on people with disabilities, leading to anxiety and isolation, which can hinder independent living. The Equalities and Human Rights Commission's 2018 report identified that disabled individuals face disadvantages in the private rented sector due to landlords' reluctance to adapt properties, hesitance to rent to them, and short-term tenancies discouraging adaptations. Hazards in unsafe properties can exacerbate existing conditions. Implementing these licensing schemes will help improve conditions and safety for disabled tenants as the scheme will generate increased inspections. This will ensure people are referred to the appropriate internal departments or external agencies to have their living accommodation suitably assessed and adapted for their needs. Unsuitable or un-adapted housing can have a negative impact on disabled people, leading to mobility problems inside and outside the home, poorer mental health and a lack of employment opportunities. An ageing population will see the numbers of disabled people continuing to increase and it is important that the Council continues to use measures such as property licensing to ensure its residents with disabilities are living in safe, well-adapted homes. If properties are assessed for the health and safety of their inhabitants, it is probable that people with mobility and visual/hearing difficulties, for example, may disproportionally benefit from licensing through professionals' suggestions of supportive modifications to the properties. This would serve to reduce the inequality gap between those with and without serious long-term health conditions. The proposed selective and additional HMO licensing schemes are considered to have an overall positive impact on this group. Proportionally the schemes are more likely to impact on people without long-term disabilities or illnesses as these people are less likely to be in rented accommodation in the borough. However, for persons with disabilities/long-term illnesses who are in private rented accommodation, the schemes will also benefit them. <u>Respondents to the consultation</u> 9% of the respondents to the questionnaire said they have a long-term physical or mental health condition or illness, which is less than the Census 2021 figure of 14% for the borough.

	Of this 9% who said they have a long-term physical or mental health condition, the majority were in favour of the proposals.
There is an impact on sex	Census 2021 data shows that the numbers of males and females inhabiting the PRS in Havering corresponds with the total Havering population.  The assessment of landlords to be 'fit and proper people' will identify any with convictions for hate crimes of any kind, excluding these people from a position where harassment, victimisation or discrimination of any kind has the potential to be particularly harmful. The assessment of landlords should on balance reduce the number of landlords in the borough who might discriminate against people on the grounds of their sex. The proposal for these licensing schemes which, if agreed and implemented, would serve to improve the standard of the PRS. It is considered that this would have an overall positive impact on both female and male PRS tenants.

There is an impact on ethnicity	Data from the 2021 census indicates that people who rent from a private landlord are broadly representative of the ethnicities within Havering's wider population, although some groups are over or underrepresented: • The largest ethnic group in Havering, White' (75% of Havering residents) is slightly underrepresented in the PRS, making up 64%. • All other ethnic groups are slightly overrepresented ('Other ethnic group' with 3% versus 2% in the borough overall; 'Mixed or multiple ethnic groups' with 5% versus 4% in the borough overall; Black, Black British, Black Welsh Caribbean or African with 15% versus 8% in the borough overall; Asian, Asian British or Asian Welsh with 12% versus 11% in the borough overall)  <u>Respondents to the consultation</u> Of the respondents who chose to answer this question, the largest ethnic group was White or White British, who made up 79% of respondents. This is higher than the borough's Census figure of 75%. This was followed by Asian or Asian British, making up 5% of respondents which is above the Census figure of 11%. Mixed or multiple ethnic group respondents made up 3%, compared to the Census figure of 4% and Black or Black British respondents were 4%, compared to the Census figure of 8%, therefore both Asian or Asian British and Black or Black British respondents were underrepresented. It should however be noted that, along with many of the other equalities questions, more than half of the overall survey respondents chose not to share their ethnicity, so definitive conclusions about representation cannot be made. Most ethnic groups were broadly in favour of the proposals to introduce both selective and additional HMO licensing schemes.

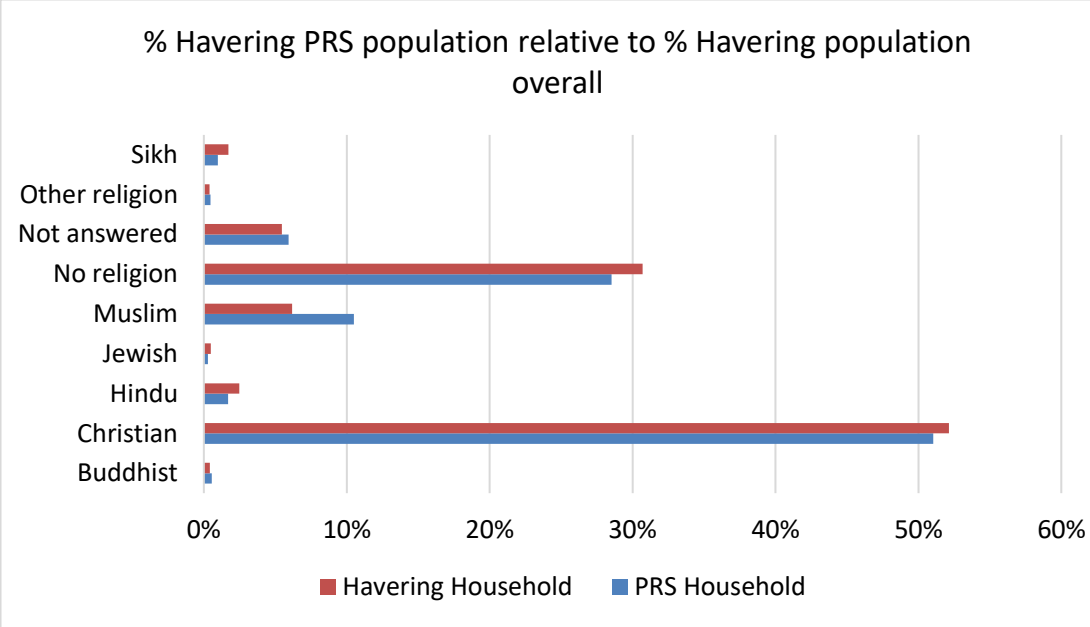


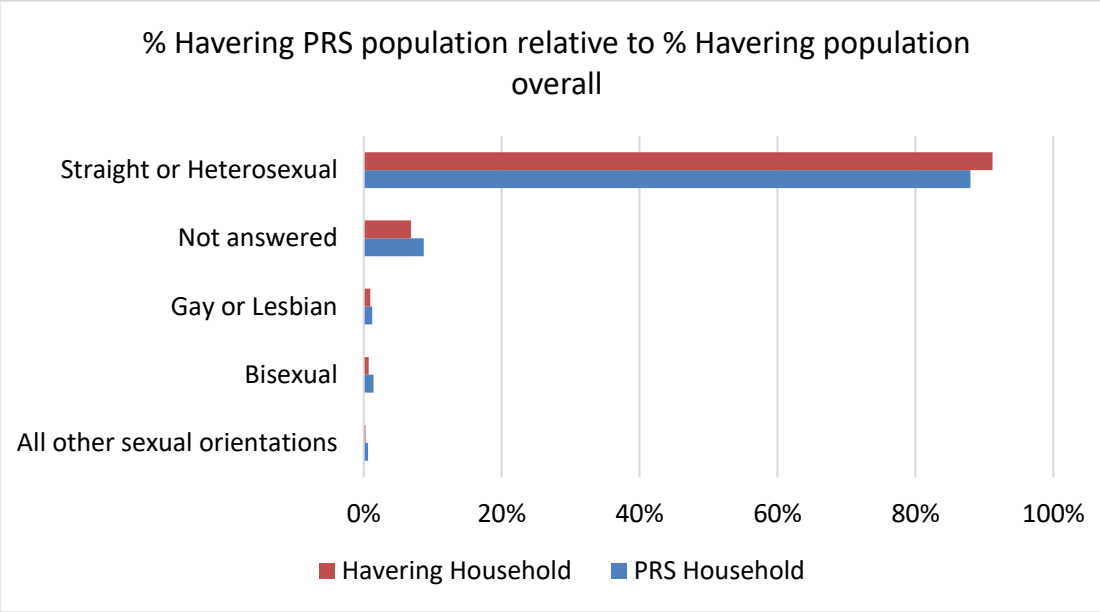


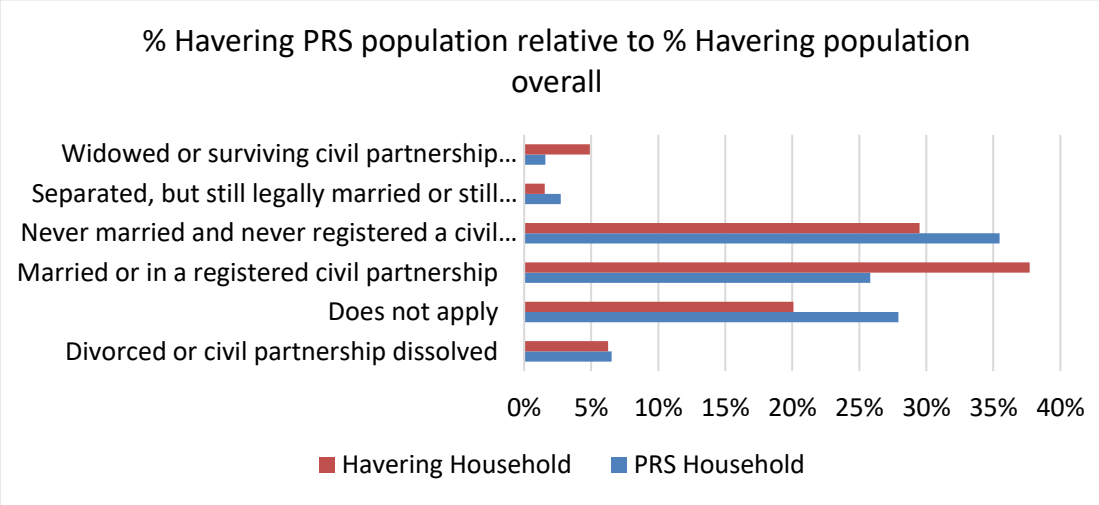
The additional HMO and selective licensing schemes aim to safeguard vulnerable households from unscrupulous landlords. They aim to ensure tenants receive legal protections while taking robust enforcement actions against landlords who exploit their tenants and do not comply with their legal responsibilities.

The assessment of landlords to be 'fit and proper people' will identify any with convictions for hate crimes of any kind, excluding these people from a position where harassment, victimisation or discrimination of any kind has the potential to be particularly harmful. The assessment of landlords should on balance reduce the number of landlords in the borough who might discriminate against people on the grounds of their race.

The proposals for the additional HMO and selective licensing schemes, if agreed and implemented, would serve to improve the standard of the PRS. It is considered that this would have an overall positive impact across all ethnic groups.

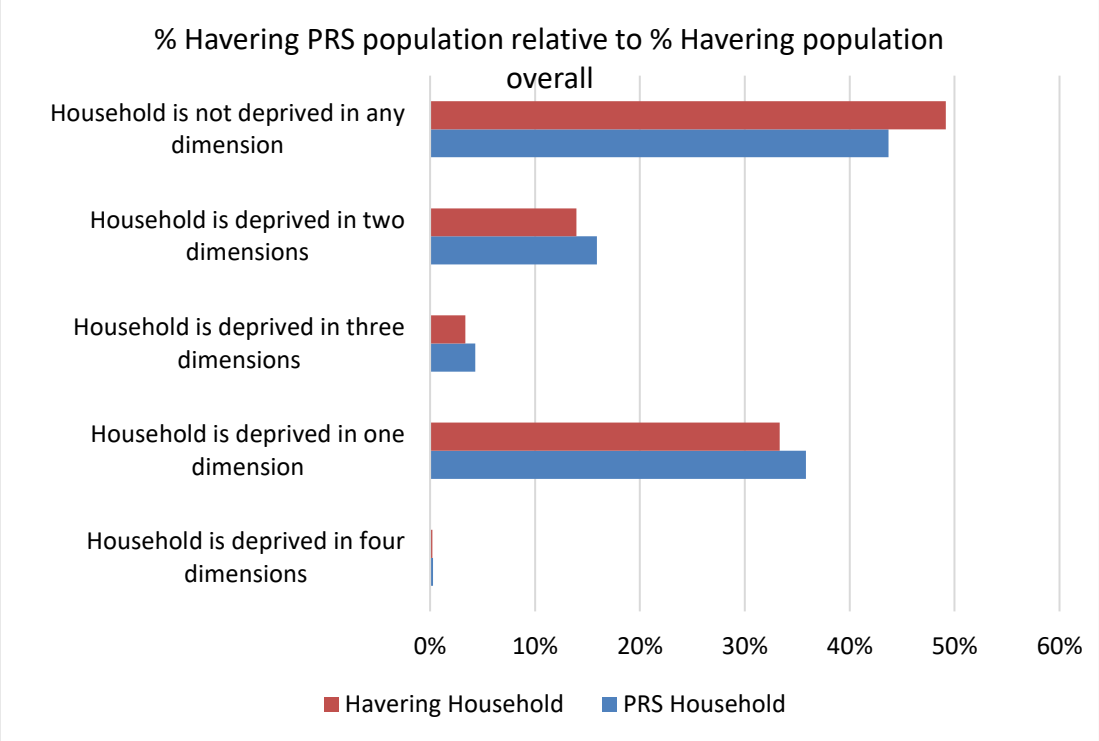
There is an impact on religion/faith	According to census 2021 data, the religious beliefs of persons occupying the PRS in Havering are broadly reflective of the wider population living in the borough. However, Muslims are somewhat overrepresented in the PRS (10.5%) compared to the borough as a whole (6.2% of Havering's population).  While there is limited evidence to suggest that renters might face poor conditions or exploitation in the private rented sector solely due to their religion, instances of direct or indirect religious discrimination cannot be entirely ruled out. It is more probable that when religion intersects with race and immigration status, renters may experience disadvantages or discrimination, potentially restricting them to the most insecure or substandard housing options. The assessment of landlords to be 'fit and proper people' will identify any with convictions for hate crimes of any kind, excluding these people from a position where harassment, victimisation or discrimination of any kind has the potential to be particularly harmful. The assessment of landlords should on balance reduce the number of landlords in the borough who might discriminate against people on the grounds of their religion or beliefs. The proposals for the additional HMO and selective licensing schemes, if agreed and implemented, would serve to improve the standard of the PRS. It is considered that this would have an overall positive impact across all faith groups, and those of no faith at all.

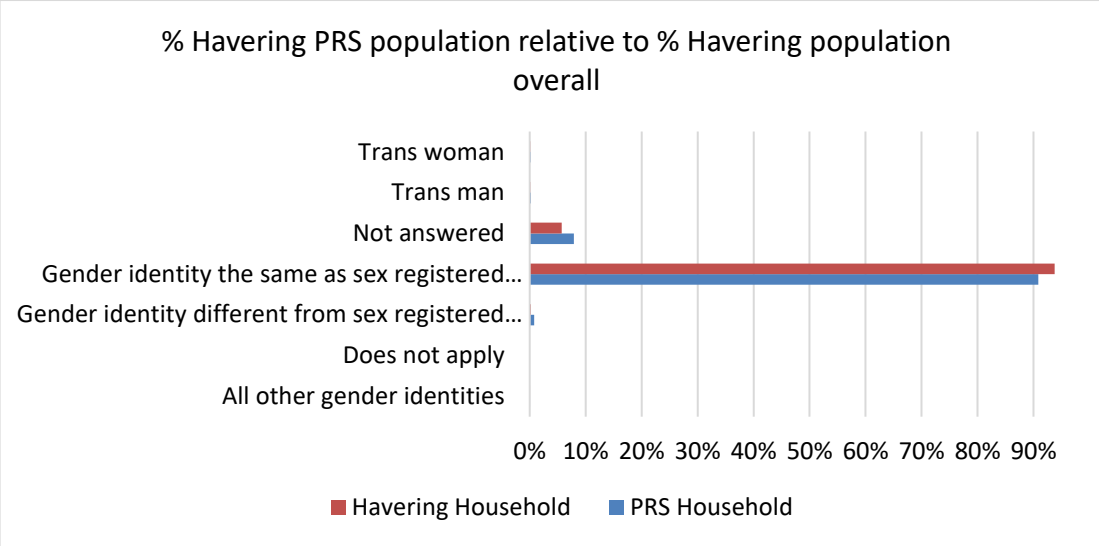
There is an impact on sexual orientation	According to Census 2021 data *(residents aged 16 and over)*, the sexual orientation of residents within the PRS in Havering is broadly similar to that of the wider Havering population.  Additional HMO and selective licensing aim to reduce antisocial behaviour which is likely to benefit people who suffer homophobic crime and incidents. The assessment of landlords to be 'fit and proper people' will identify any with convictions for hate crimes of any kind, excluding these people from a position where harassment, victimisation or discrimination of any kind has the potential to be particularly harmful. The assessment of landlords should on balance reduce the number of landlords in the borough who might discriminate against people on the grounds of their sexual orientation. The proposals for the additional HMO and selective licensing schemes, if agreed and implemented, would serve to improve the standard of the PRS. It is considered that this would have an overall positive impact on tenants irrespective of sexual orientation.

There is an impact on marriage/civil partnership	Census data 2021 indicates that certain groups are over or underrepresented within Havering's PRS. Overall, married individuals and widowed or surviving civil partnership partners are much more likely to be in the PRS, while all other demographics are overrepresented in the PRS.  The assessment of landlords to be 'fit and proper people' will identify any with convictions for hate crimes of any kind, excluding these people from a position where harassment, victimisation or discrimination of any kind has the potential to be particularly harmful. The assessment of landlords should on balance reduce the number of landlords in the borough who might discriminate against people on the grounds of whether they have entered into marriage or a civil partnership with someone of the same or a different sex. The proposals for the additional HMO and selective licensing schemes, if agreed and implemented, would serve to improve the standard of the PRS. It is considered that this would have an overall positive impact on tenants irrespective of whether or not they are married or in a civil partnership.
There is an impact on pregnancy, maternity and paternity	The Council does not hold specific data regarding pregnancy and maternity within the PRS. However, the ONS linked births dataset shows that in 2024 there were a total of 3,235 live births in Havering[1]. In 2022, the live birth rate was 11.7 per 1,000 population in the borough, which is predicted to remain stable over the next ten years[2]. We already know that nearly 30% of children who are aged 2 and under, and nearly 23% of children between the ages of 3 and 15 in Havering live in the PRS. This suggests that a significant proportion of families with children reside in the private rented sector, and highlights that the licensing scheme's advantages would positively impact both parents and expectant parents. The assessment of landlords to be 'fit and proper people' will identify any with convictions for hate crimes of any kind, excluding these people from a position where harassment, victimisation or discrimination of any kind has the potential to be particularly harmful. The assessment of landlords should on balance reduce the number of landlords in the borough who might discriminate against people on the grounds of pregnancy or maternity. The proposals for the additional HMO and selective licensing schemes, if agreed and implemented, would serve to improve the standard of the PRS. It is considered that

[1] Births in England and Wales: linked births - Office for National Statistics
[2] Birth characteristics - Office for National Statistics

	this would have an overall positive impact on pregnant women and women caring for babies and young children.

There is an impact on socio-economic	Labour Market, Industry, Occupation, and Travel to Work data states 59.5% of residents in Havering have a job, an increase from 58.9% in 2011. 3.6% of residents are unemployed, which is the fourth lowest rate in London but an improvement from the rate of 5.0% in 2011. 21.0% of residents are retired - the highest rate in London, which is in line with or high older person population. Havering ranks as the 179 (rank of average rank) most deprived borough in England out of 317. Havering has a mixture of high and low deprivation wards. 4 of 20 wards have aggregated IMD rankings below decile 5 (national average). Census data 2021 indicates that PRS households are more likely to be deprived in at least one dimension than the borough average. 51% of Havering's population is deprived in at least one dimension, while 57% of the borough's PRS population is deprived in at least one dimension.  Private Renters on low income are likely to be positively impacted where poor energy efficiency and energy costs are impacting disposable income through improvements in housing standards. The impact of the license fee on both landlords and tenants is likely to be minimal as a license lasts 5 years. Any perceived negative impact is likely to be outweighed by improvements to housing and management standards.

There is an impact on gender	According to Census 2021 data (residents aged 16 and over), the gender identities reflected in the Havering residents who rent from a private landlord are broadly the same as in the wider Havering population. (Gender Identity estimates from Census 2021 are official statistics in development. This reflects their innovative nature and the evolving understanding of measuring gender identity, along with the uncertainty associated with these estimates3.)  According to Stonewall's Trans Report (2018)[4]: • One in four trans people (25%) were discriminated against when looking for a house or flat to rent or buy in the last year (up to 2018). • One in five non-binary people (20%) have experienced discrimination while looking for a new home. • Two in five trans people (41%) have experienced a hate crime or incident because of their gender identity in the last 12 months (most recent data from 2018). • Three in ten non-binary people (31%) have experienced a hate crime or incident because of their gender identity. Additional HMO licensing aims to reduce antisocial behaviour within and associated to private rented homes, which is likely to benefit people who suffer transphobic crime and incidents. The assessment of landlords to be 'fit and proper people' will identify any with convictions for hate crimes of any kind, excluding these people from a position where harassment, victimisation or discrimination of any kind has the potential to be particularly harmful. The assessment of landlords should therefore on balance reduce the number of landlords in the borough who might discriminate against people because of gender reassignment. The proposals for the additional HMO and selective licensing schemes, if agreed and implemented, would serve to improve the standard of the PRS. It is considered that this would have an overall positive impact on tenants irrespective of gender reassignment.

[3] Sexual orientation and gender identity quality information for Census 2021 - Office for National Statistics (ons.gov.uk)
[4] LGBT in Britain - Trans Report (2018) | Stonewall

There is an impact on health	In Havering an estimated 219,777 residents had 'good' or 'very good' health in 2021. This is an age standardised proportion (ASP) of 83.0%, which is higher than London (81.9%) and England (81.7%). However, in Havering, an ASP of 48.2% residents had 'very good' health compared to 49% in London. 22.78% of those residents who completed the ONS annual population survey in 2020/21 self-reported their wellbeing as high anxiety Licensing can assist in improving the condition/quality of rental accommodation, by improving management and responsiveness of property owners. This will likely have a positive impact on a tenant's mental health and wellbeing. It is also expected that positive impacts will be realised by our officers adopting a whole person approach, with the ability to identify any concerns and make referrals to internal partners such as social care services**.**

There is an impact on social cohesion	Property licensing allows the Local Authority to easily identify, and communicate with owners of PRS properties, improving intergroup cooperation. The imposition of licensing conditions on owners of properties further incentivises cooperation between all parties for the betterment of the common good. Property licensing can assist in improving the condition/quality of rental accommodation, along with improving management and responsiveness of property owners. This can improve a tenant's confidence in political institutions, and their perception of fairness, thereby positively impacting their social trust levels. Compliant landlords are likely to negatively view property licensing, considering it overbearing, and unnecessary. However, it provides the Local Authority the tools to target the worst landlords, and drive them out of the market through formal enforcement actions. By monitoring incoming consultation responses, the Local Authority can determine whether/if mitigating actions are required.
How frequently will the EQHIA be reviewed	**A review will take place XXXXX.**
Scheduled date of review	
Lead officer conducting the review	**Michelle Hammond**

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From: Mayor of London <mayor@london.gov.uk>
Sent: 31 July 2025 08:28
To: prsconsultation <prsconsultation@havering.gov.uk>
Subject: MGLA300625-8965 FW: Havering Council Selective and Additional Licensing Consultation

Dear Havering Council,

Thank you for sharing your Additional HMO and Selective Licensing scheme consultations with the Mayor of London.

The Mayor considers property licensing to be one of the most valuable tools councils have to regulate and target their enforcement activity. There is strong evidence that selective licensing schemes help to drive up standards and conditions when used in the private rented sector (PRS). The Mayor's 2024 election manifesto committed to ensuring that selective licensing powers can be used to take action against the poorest performing landlords.

As the consultation document states, there are 109,048 residential dwellings in Havering of which 21,082 are privately rented. In recent years, the private rented sector in LB Havering has increased by 68% from 11.5% in 2011 to 19.3% in 2024. LB Havering's evidence shows that serious hazards are likely to be distributed across the whole borough, with all wards having predicted rates of serious hazards above the national average.

The proposed Additional HMO and Selective Licensing Schemes seek to address the prevalence of poor housing conditions across seven wards. The total size of the selective licensing designation would affect 34.5% of the geographical area of Havering and 49.7% of its privately rented housing. The proposed licensing scheme is a key measure which forms part of an overall housing strategy including the: Havering Corporate Plan, upcoming Housing Strategy, Homelessness and Rough Sleeping Strategy and other key strategies. The scheme includes discretionary scheme conditions which support the objective of the proposed scheme to address the prevalence of poor housing conditions in the private rented sector.

LB Havering have used the administration and robust enforcement of their current licensing schemes to address poor housing conditions. Between 2019- 2024, LB Havering have served 535 housing and public health notices, 127 penalties and initiated eight prosecutions to address housing offences.

The Mayor is **supportive** of LB Havering's proposal for a selective licensing scheme. scheme.

Yours sincerely,

PRS Team

Housing Strategy and Policy Team
Greater London Authority
City Hall, Kamal Chunchie Way, London E16 1ZE

Havering
LONDON BOROUGH

This Report is part exempt and Appendix A is not available for public inspection as it contains or relates to exempt information within the meaning of paragraph 3 of Schedule 12A to the Local Government Act 1972. It is exempt because it refers to the financial or business affairs of any particular person (including the authority holding that information), and the public interest in maintaining the exemption outweighs the public interest in disclosing the information

CABINET	10th December, 2025
Subject Heading:	**Bridge Close – Proposed Making of the Planning Compulsory Purchase Order**
Cabinet Member:	Councillor Graham Williamson Cabinet Member for Development and Regeneration
ELT Lead:	Neil Stubbings Strategic Director of Place
Report Author and contact details:	Nick Gyring-Nielsen Senior Regeneration Manager nick.gyring-nielsen@havering.gov.uk
Policy context:	The Council has sole ownership of a delivery vehicle, Bridge Close Regeneration LLP (BCR LLP) whose purpose is to deliver the comprehensive regeneration of Bridge Close, Romford in accord with the Council's development and investment priorities for regeneration as set out in: Havering Local Plan 2016-2031 Romford Area Action Plan (2008) Romford Town Centre Development Framework (2015) The emerging Romford Masterplan. Bridge Close LLP Business Plan 2025/26 and Land Acquisition Strategy. Housing Revenue Account Business Plan Update and Capital Programme

Financial Summary	The Council has made provision in the financial year 2025/2026 to provide funding for the Council to meet financial commitments arising from the operation of Bridge Close LLP (BCR LLP) in accordance with the project documents, including costs arising from the BCR LLP Land Acquisition Strategy as approved by Cabinet on 16th December, 2020 the subsequent approved BCR LLP Business Plans 2022/2023, 2023/2024, 2024/25, and 2025/26 as approved by Cabinet on the 5th February, 2025.
Is this a Key Decision?	This is a key decision because the expenditure exceeds £500,000.
When should this matter be reviewed?	December, 2026
Reviewing OSC:	Place

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

People – Things That Matter for Residents	X
Place – A Great Place to Live, Work and Enjoy	X
Resources – A Well-run Council That Delivers for People and Place	X

SUMMARY

1.1 The purpose of this report is to fulfil a recommendation within the Bridge Close Regeneration LLP Business Plan Refresh 2025-26 report approved by Cabinet on the 5th February 2025.

1.2 That recommendation requested that Cabinet:

"*Note that the Strategic Director of Place, in consultation with the Strategic Director of Resources the and the Deputy Director of Legal and Governance, will bring forward a report providing status of the proposed making of the Compulsory Purchase Order (CPO) for the Bridge Close Regeneration scheme at the appropriate time in the financial year 2025-2026.*"

1.3 Cabinet also noted that the Council would support Bridge Close Regeneration LLP (BCR LLP) in the implementation of the land acquisition process as set out in the BCR LLP Land Acquisition Strategy through the deployment of its CPO powers to enable the acquisition of the land interests required for the regeneration development scheme and infrastructure which cannot be acquired by private treaty.

1.4 A hybrid planning application with reference P1765.23 was submitted and validated on 29 November 2023 for the redevelopment of land at Bridge Close, Romford (the Scheme), to provide a high quality mixed-use residential quarter delivered across three phases. On 28th August 2025, Strategic Planning Committee (SPC) resolved to grant planning permission for the Scheme.

1.5 This paper is brought to Cabinet setting out details on;

- The proposed CPO within the Order Plan; and

- Requests that Cabinet approves the making of a CPO and related powers in respect of the land, interests and rights to obtain vacant possession, where necessary, to enable the delivery of the regeneration of Bridge Close where it has not been possible to acquire the land, interests and rights by agreement. The scheme, which is shown on the CPO Map of the Order Land at Appendix B, provides for the comprehensive regeneration of Bridge Close, Romford, including the following:

  i. Up to 1,070 new homes (incl. between 35% and 50% affordable homes subject to viability)
  ii. A 3-form entry primary school with nursery and SEND provision
  iii. Community and cultural space
  iv. Local health facilities
  v. Commercial floor space, including affordable work space
  vi. Improved east-west links, including a new pedestrian and cycle bridge
  vii. Environmental improvements to the River Rom.

RECOMMENDATIONS

That Cabinet:

1. **Agree** to the Council making Compulsory Purchase Order(s) (CPO) pursuant to the statutory powers contained in section 226 of the Town and Country Planning Act 1990 (as amended), and section 13 of the Local Government (Miscellaneous. Provisions) Act 1976 and all other necessary powers to facilitate acquisition of all property and other proprietary interests on the land, including where appropriate new rights, located within the outline on the CPO Order Plan at Appendix B, for the purpose of securing the comprehensive regeneration of Bridge Close, Romford ("Order Land").

2. **Agree** that the Strategic Director of Place after consultation with the Leader of the Council, the Strategic Director of Resources and Deputy Director of Legal Services be authorised to;

   a) Make the CPO to enable the acquisition of land, interest and rights within the CPO Map of the Order Land as attached to this report at Appendix B;

   b) Appoint surveyors, barristers and any other professionals required to promote the CPO and to facilitate the vacant possession of interests located within the CPO Order Plan;

   c) Settle the final form and content of the CPO and associated documentation to include the:

      - Draft Map of the Order Land, see Appendix B
      - Draft Schedule Freehold and Leasehold Interests, see Appendix C
      - Draft Statement of Reasons, see Appendix D
      - Draft Equalities Impact Assessment, see Appendix E
      - Draft Statement of Community Involvement, see Appendix F

   d) Take all necessary steps to secure the making, confirmation and implementation of the CPO, including issuing notices on land owners and stakeholders with a view to obtaining information to facilitate deduction of title under section 16 Local Government (Miscellaneous Provisions) Act 1976, publication and service of CPO notices, addressing any objections to the CPO, presentation of the Council's case at Public Inquiry, or Court should such representation be necessary and entering into agreements with objectors/stakeholders;

   e) Take such actions so as to facilitate Bridge Close LLP acquiring properties and proprietary interests within the CPO Map of the Order Land by agreement, such actions to include; the relocation of businesses, residents and statutory undertakers apparatus or Communication Code Operators; and any other interests and setting out the terms for the withdrawal of objections to the CPO; and

   f) Amend the number of properties and leasehold acquisitions within the CPO Map of the Order Land at Appendix B and including the extension and revision of the blue line, should such amendments be required to deliver the overall comprehensive regeneration of Bridge Close.

g) Undertake any further actions and matters incidental to progressing the CPO and facilitating the acquisition of the Order Land.

3. **Agree** that the Strategic Director of Place after consultation with the Leader of the Council, the Strategic Director of Resources and Deputy Director Legal Services be authorised following the confirmation of the CPO by the Secretary of State to secure vacant possession of all properties and proprietary interests located within the confirmed CPO Blue Line land to include:

   a) to take all necessary actions to secure the making and service of a General Vesting Declaration (GVD) or multiple GVD's under the Compulsory Purchase and (Vesting Declarations) Act 1981 and /or to serve Notices to Treat and Entry (if required); and

   b) to appropriate to planning / or housing purposes any parcel of land within the CPO Order Plan; and

   c) to; transfer, or grant a license over, all properties and proprietary interests acquired pursuant to the CPO to the relevant development or contractor partner; and

   d) if necessary, make representation of the Council's case such as at the Upper Tribunal (Lands Chamber) or court should such representation be necessary.

4. **Agree** that in the event that the Cabinet approves recommendations 2 and 3 above, and upon the Deputy Director of Legal Services being satisfied that further information and all the Equalities Impact Assessment recommendations have been considered to not require reference back to Cabinet, that the Deputy Director of Legal Services be authorised to affix the common Seal of the Council to the CPO, GVD(s), maps and elsewhere and to take all steps as necessary, such as to issue notices and sign certificates to attain the resolutions above.

REPORT DETAIL

1.0 Background

1.1 Bridge Close is a 3.89 hectare site currently occupied by mixed industrial, warehouse and ancillary units under multiple ownerships, an ambulance station, Islamic Cultural Centre and a number of terraced properties which front onto Waterloo Road and Oldchurch Road in Romford. There are 22 commercial properties and 37 residential properties within the site as set out in Appendix C.

1.2 The Council has been consistent in promoting and progressing its vision to transform Bridge Close, currently a declining, under occupied, light industrial estate with a degraded environment. It is a key regeneration site on the edge of Romford town centre with an ambitious Council regeneration objective to deliver a residential-led, mixed-use development delivering up to 1,070 new homes including genuinely affordable housing, key social infrastructure, including a new school, health facility, high quality public realm, pedestrian and cycle routes both within and connecting the new community to Romford Town Centre and public transport nodes at Romford Station including a new bridge over the River Rom along with its revitalisation as a watercourse. The development will also deliver commercial and affordable employment space.

1.3 On 16th September 2020, Cabinet resolved for the Council to take full and sole control of Bridge Close Regeneration LLP (BCR LLP) in order to ensure the full implementation and comprehensive regeneration of Bridge Close. Previously BCR LLP had been a 50/50 joint venture between the Council and a private sector partner. Although the joint venture had made significant progress in scheme design, consultation and land acquisitions, unforeseen events including the Covid – 19 pandemic, subsequent resetting of development markets and rising construction costs led to the withdrawal of the private sector partner; on 29th October 2020, the Council entered into a purchase agreement to acquire the interest in BCR LLP that it did not already own from the private sector partner.

1.4 On 16th December 2020, Cabinet approved the recommendation that the Council continue to deliver the regeneration of Bridge Close, taking sole ownership of BCR LLP and funded predominantly through the Council's Housing Revenue Account (HRA).

1.5 The Bridge Close Regeneration LLP Business Plan 2022-2023 was approved by Cabinet on 16th February 2022 and a refreshed Business Plan for 2023-2024 was approved on the 8th February 2023. Most recently, the Business Plan 2025-2026 was approved by Cabinet on the 5th February 2025. Together, and in and of themselves, these decisions are strong statements of the Council's determination to fulfil the regeneration vision of this key site in Romford Town Centre and deliver the associated benefits, including the generation of long-term social value for people of Romford and the wider Borough of Havering.

1.6 The Business Plan forms part of a comprehensive suite of project documents, including the Members' Agreement, the Land Agreement, the Land Acquisition Strategy, and the Loan Note Instruments, which amongst others, set out the strategy and the terms and conditions for provision of funding by the Council as principal Member of the Joint Venture (noting that a wholly owned company of the Council acts as second member of the JV). The Business Plan also includes a budget and financial model with detailed forecasts, which provides a

management framework for delivering the vision and objectives for the regeneration of Bridge Close.

1.7 The key strategy document to ensure the comprehensive regeneration of Bridge Close is the BCR LLP Land Acquisition Strategy that has been adopted and approved by Cabinet as part of the annually recurring BRC LLP Business Plan approvals. It will be necessary to obtain full vacant possession, by negotiation or CPO as a last resort, of the site prior to starting any development on site.

1.8 The Land Acquisition Strategy provides the proposed strategy, budget and cashflow forecast for BCR LLP to acquire land interests within the development site by agreement. It identifies the agreed approach, priorities and responsibilities for BCR LLP, together with the communication protocols and external support required to successfully implement the strategy.

1.9 The primary objectives of the Land Acquisition Strategy are the following:

i. To manage the acquisition of the land required to enable the delivery of the proposed development
ii. To prioritise acquisition of land by agreement or using landlord and tenant powers, where appropriate
iii. To provide clear and accurate information and assistance to third party owners and occupiers within the site in order to mitigate the impact on residents and businesses
iv. To assist occupiers with relocation options, as far as this is possible
v. To ensure landowners and occupiers have access to good quality professional advice through the implementation of a fee reimbursement policy.

1.10 The Land Acquisition Strategy also sets out the principle of the deployment of the Council's Compulsory Purchase Order (CPO) powers as a means of last resort in circumstances where private treaty discussions prove unable to conclude in agreed terms the acquisition and purchase between all parties.

1.11 The Land Acquisition Strategy also commits that all private treaty discussions and agreements are completed in accordance with current CPO guidance and regulatory framework to ensure appropriate support as well as disturbance and compensation payments are provided and will ensure:

i. BCR LLP will take reasonable steps to acquire land and rights by agreement.
ii. Any offers BCR LLP makes to landowners and occupiers will reflect their entitlement to compulsory purchase compensation and the ‘value for money’ an acquisition may provide to the project as a whole.
iii. BCR LLP will engage constructively with occupiers over relocation issues where relevant.
iv. BCR LLP will work with occupiers to mitigate the risk of loss, as far as it is able to do so.
v. Where disputes over compensation arise, BCR LLP will give consideration to the settlement of those disputes through the early use of Alternative Dispute Resolution.

1.12 Within the BCR LLP Business Plan are also two related strategy documents that set out the approach to offering relocation opportunities, if required, to business and residential occupiers. A Business Relocation Strategy and a Residential Relocation Strategy have been developed to support the relocation of businesses to enable sites to come forward for comprehensive residential development.

1.13 While the Council has no statutory obligation to relocate businesses, representatives of the Council and BCR LLP have been working closely with business occupiers and owners to provide advice and support as recommended by the CPO guidance. As part of its commitment to support local enterprise the Council and BCR LLP will continue to assist businesses to seek suitable alternative accommodation, and where appropriate, will try to keep quality businesses within the borough.

1.14 BCR LLP has also engaged with owner-occupiers of the Havering Islamic Cultural Centre to seek agreement for relocation in accordance with their requirements and pursuant to the CPO Code and Guidance[1]. Given the HICC is considered community infrastructure providing community services, which requires relocation under planning policy and CPO Guidance, constructive discussions are progressing having identified a potential site for their relocation at 222-226 South Street in Romford.

1.15 BCR LLP has engaged extensively with London Ambulance Service. Current discussions focus on arrangements for the Romford Ambulance Station to remain on site as an integrated part of the Bridge Close Regeneration scheme. This aligns with the London Ambulance Service's objective to retain an operational presence in Romford and provides the option for continued discussions in circumstances where the London Ambulance Service may relocate to a larger site in accordance with their long-term estate strategy.

1.16 Meetings/interviews have and are continuing to be held with all residential owners and occupiers to ascertain their specific tenure circumstances and ensure that any solutions offered best meet their ongoing needs and accommodation requirements relocation.

1.17 In order to authorise the making and implementation of the CPO, section 226(1)(a) of the Town and Country Planning Act 1990 requires that members must be satisfied that the use of the compulsory powers will facilitate the development, redevelopment or improvement of land, and that it is likely to contribute towards the promotion or improvement of the economic, social and environmental well-being of the area. Further, members must be satisfied that there is a compelling case in the public interest for making and promoting the CPO, that the use of the powers is proportionate, and that the public benefits associated with the proposed regeneration will clearly outweigh the interference with the rights of those affected. These matters are explained and considered in more detail below and in the draft Statement of Reasons at Appendix D

1.18 The draft Statement of Reasons is the document that sets out the basis of the Council's case and justification for making and pursuing the CPO. This will be served on all those affected by the CPO.

2.0 Progress

2.1 Ardent Management Limited (Ardent) continue to act as property and CPO advisor to BCR LLP to identify all parties who may be affected by the Scheme and actively negotiate with all parties with an interest located within the CPO Map of the Order Land, attached at Appendix B, with a view to acquiring their interests by agreement wherever possible, including potential options for the relocation of business interests. Ardent have compiled property cost estimates for all the acquisition sites including valuations, compensation and

[1] The Compensation Code is a collective term used for the principles set out in various Acts of Parliament, supplemented by case law, that relate to compensation for compulsory acquisition. The Guidance refers to, "Guidance on the Compulsory Purchase Process" of October 2024 by the Ministry of Housing, Communities and Local Government.

disturbance costs where appropriate. Ardent have regularly refreshed these to ensure that land interest information is up to date and accurate.

2.2 BCR LLP and the Council have sought to engage with all landowners and occupiers via the undertaking of site visits, holding meetings to explain the need for acquisitions and have held a number of public consultation events to highlight the detailed development proposals. The outcomes of the public consultation evens are set out in the Statement of Community Involvement at Appendix F. Letters have been circulated to business and residential property owners respectively, to keep them informed of the regeneration proposals and acquisition process as it has progressed.

2.3 As such, the Council and BCR LLP continue to engage with all owners and occupiers of residential and commercial interests on Bridge Close. All residential and commercial property owners have instructed valuations and private treaty discussions are underway, noting that in a substantial number of cases, differing opinions of value serves as a source of delay in reaching agreement.

2.4 Significant progress has been made on land acquisition to date with the Council having acquired over 70% of the freehold/long leasehold interests within the order land including approximately 64% of commercial properties acquired and or Heads of Terms agreed. 32 out of a total of 37 residential properties, 87% by area, have been acquired. Further engagement and communication is underway with the remainder of owners and occupiers.

2.5 Progress is continuing to be made on private treaty discussions with owners and occupiers of both residential and commercial property. The table below sets out the interests acquired to date, exchanged or subject to contracts with a right to purchase on agreed terms.

Table 1 Indicative Property Interests Held by the Council or BCR LLP (Hectares)[1]

Interest	Total (Ha)	Held (Ha)	% Held
Residential Property	0.64	0.56	87%
Commercial Property	2.48	1.58	64%
Public & Other Unregistered Land	0.31	0.14	44%
Unregistered Land with Council as Highway Authority	0.46	0.46	100%
Total	3.89	2.74	70%

[1] **Freehold interest held in hectares (ha), Ardent Management Limited, 2025. Total area of 3.89 ha corresponds to area within blue line of the Map of the Order Land in Appendix B.**

Including unregistered land of 0.46 ha already held with the Council as Highway Authority, the total area acquired to date, exchanged or subject to contracts with a right to purchase on agreed terms amounts to 2.74 ha or 70% of the total area within the Bridge Close due for long-term regeneration.

2.6 Havering Islamic Cultural Centre ('HICC') and the London Ambulance Service (LAS) are two significant non-residential properties on the site where discussions are ongoing but where sites have not yet been acquired. Whilst discussions with the HICC focus on concluding an agreement for the relocation of the HICC to a site outside the Bridge Close boundary, discussions with the LAS centre on retaining the ambulance station on site.

2.7 Romford Ambulance Station

2.8 The site is owned and occupied by the London Ambulance Service ("LAS"). The Scheme, as reflected in the current planning application P1765.23, retains the existing LAS building onsite during the implementation of Phase 1 save for a small sliver of the site comprising approximately 303 sqm of hardstanding immediately to the north of the ambulance building.

The sliver of land is required to facilitate the delivery of the school and an emergency fire access route to the rear of the new school.

2.9 Since 2016 the Council have made efforts to acquire the entire freehold interest of the LAS site. Despite LAS and the Council working closely together to identify potential relocation properties, however, a whole site acquisition and relocation to a replacement site has not proved possible, primarily owing to LAS resource constraints.

2.10 Accordingly, in order to deliver the Council's regeneration objectives whilst retaining the services provided by the Romford Ambulance Station, the Order Land includes the sliver of land only as set out at Appendix B. Private treaty discussions are progressing to reach agreement in advance of any potential making and confirmation of the CPO. Appropriate amendments to the town planning strategy are set out at section 3.0 below.

2.11 The sliver of land is presently used to park around 10 ambulance vehicles. In addition, there is a roller shutter door to the rear which, following an acquisition, would no longer function as a secondary access/egress for vehicles. To ensure the existing operational effectiveness of LAS is maintained prior to the acquisition of the sliver, properties next to the LAS site have been acquired and sufficient clear land will be made available to the LAS in perpetuity to ensure the 10 spaces lost are re-provided. Furthermore, appropriate arrangements are in place to ensure meanwhile car parking is provided during construction of the replacement parking facility. Overall, further to technical review, current uses, workflows and access and egress arrangements from the LAS building will remain substantially unaffected by the Scheme and without adverse impact on the response capability and the services provided by the Romford Ambulance Station.

2.12 The Council recognises the importance of the services provided by LAS to the local community and has confirmed its commitment to ensure that, with the acquisition of the sliver of land, the existing operational effectiveness of LAS is maintained in perpetuity. The Council notes the LAS estate strategy objective to locate to a larger site elsewhere in Romford in order to facilitate an increase in operational capacity. Equally, the Council's vision for delivery of the comprehensive regeneration of Bridge Close, including LAS land, remains unchanged, leaving open the possibility of entering into private treaty discussions with respect to the remaining LAS land in the fullness of time.

2.13 Havering Islamic Cultural Centre (HICC)

2.14 The HICC occupies adjoining land and buildings at 91 Waterloo Road and 9 Bridge Close, which it uses for religious worship and other cultural and charitable purposes. Planning policy and CPO Guidance requires that accommodation housing services of the nature provided by the HICC be reinstated on an equivalent basis in circumstances where the HICC property is subject to compulsory acquisition or redevelopment.

2.15 The Council and Bridge Close Regeneration LLP have been in discussions with the HICC and its advisors since 2016 over the proposed compulsory acquisition of its land, compensation and its relocation from Bridge Close. These relocation requirements were complex and limited, in that it was considered vital to relocate within Romford town centre to fulfil its purpose, taking into account the importance of maintaining continuity of services provided by HICC to the community.

2.16 Discussions continue to be led by BCR LLP and CPO and property advisors, Ardent Management LLP, with a view to identifying a relocation solution that meets with HICC's requirements. This has included consideration of both on and off-site options, although it is recognised that HICC considers an on-site relocation to be unworkable.

2.17 An alternative site within Romford Town Centre, which HICC has confirmed as acceptable, has now been identified at 222-226 South Street and the Council is working with HICC to acquire this site. This includes incorporating the site within the blue line boundary of the CPO, see Appendix B, in circumstances where an acquisition could not be agreed by private treaty negotiation therefore requiring the Council to acquire the site through the use of compulsory purchase powers as a means of final resort.

2.18 In accordance with CPO Guidance, the Council is required to compensate the HICC for reasonable costs of relocation. Accordingly, and pursuant to professional advice, the Council has agreed to reimburse the HICC for its reasonable costs of progressing a planning application for HICC's new building. Draft heads of terms for an agreement between the Council and HICC are being progressed. The parties are in discussions on compensation for its existing land and accommodation on Bridge Close, and the arrangements for HICC funding any shortfall between its compensation and the cost of re-providing a new facility. A mechanism for substantiating HICC funding arrangements to the reasonable satisfaction of the Council is being progressed. As such, an agreement between the Council and the HICC will be entered into, setting out the terms and conditions governing the relocation of the HICC from its premises within the Order Land to new accommodation on 222-226 South Street.

2.19 The relocation site at 222-226 South Street is currently occupied by a number of tenants whom all hold short-term leases, or leases with break clauses, and vacant possession can be readily obtained, on the understanding that the site will be brought forward for occupation by the HICC in the short term. In accordance with the Guidance, engagement with owners and occupiers is ongoing to inform on Scheme developments and review how the Council may assist affected parties in the circumstances. Furthermore, an Equalities Impact Assessment has been completed in October 2024 and updated in October 2025 to understand and mitigate against differential impacts of the Scheme on members of the community sharing one or more Protected Characteristics.

2.20 HICC will only be required to move from its existing premises when the final phase of the Scheme is implemented and the Council and Ardent are working with HICC to ensure that the service it provides to the local community will not be interrupted. As such, the HICC will have the full use of its accommodation on 91 Waterloo Road during the construction of Phases 1, Phase 2 and most of Phase 3, until such time as works on the proposed new accommodation on the relocation site at South Street are complete.

2.21 Should HICC, against expectations, be unable to be successfully relocated elsewhere there may be a significant risk that compulsory purchase powers would not be granted, or conditions imposed, preventing the Bridge Close development continuing in the form and scale proposed, including the extensive regeneration and wellbeing benefits noted above and within the Statement of Reasons at Appendix D.

2.22 On balance, in relation to the HICC, with a relocation site identified, principles for compensation substantially agreed and continued constructive engagement with relevant stakeholder under way, there is reasonable prospect for successful relocation. An agreement is substantially advanced, setting out terms and conditions for implementing the relocation, including funding arrangements and payment of appropriate compensation pursuant to the CPO Guidance and Code.

3.0 Planning

3.1 Planning consent for the scheme is a significant consideration in undertaking a CPO, and a hybrid planning application was submitted on 29th November 2023. The hybrid planning application with reference P1765.23 has been submitted for the redevelopment of land at

Bridge Close, Romford, to provide a high quality mixed-use residential quarter delivered across three phases.

3.2 The hybrid planning application has been submitted in full for the initial Phase 1 to provide 383 residential units, commercial floor space, a three-form entry primary school and nursery, a pedestrian/cycle bridge, new pedestrian an vehicular arrangements and extensive new public realm works and associated infrastructure, including the revitalisation of the River Rom.

3.3 Outline planning permission has been submitted for the remainder of the site for to provide up to 687 residential units, a community centre, a health centre, office and flexible workspace, retail and other commercial uses as well associated public realm and infrastructure as well as other works incidental to the proposed development. The outline permission is accompanied by detailed parameter plans and a design code to inform future detailed proposals for future phases, serving to ensure design continuity and to safeguard the Council's vision and regeneration benefits of the scheme.

3.4 In policy terms, the application site is allocated for mixed-use redevelopment within the saved Romford Area Action Plan (2008). In addition, the Romford Town Centre Development Framework (2015) is a material planning consideration in the determination of the application, allocating the site for significant redevelopment. The Havering Local Plan (2021) also identifies the site as forming part of the Romford Strategic Development Area, which is designated to provide 5,000 new residential dwellings as well as a significant amount of new employment, retail, leisure and community uses, along with connectivity improvements throughout the town centre and to Romford Station from all areas, including Bridge Close. In accordance with the Romford Town Centre Masterplan (SPD), and through working with the Council Masterplan Team, the Scheme is co-ordinated with the overall approach for the Town Centre to ensure a joined-up approach.

3.5 The hybrid planning application seeks to redevelop the site in accordance with the requirements of the prevailing planning policy framework. The application proposals have been developed to provide a high density, high quality residential- led mixed use development to reflect the site allocation and the sustainable nature of the site within Romford Town Centre. The provision of residential development would assist in addressing the housing shortfall in the Borough and respond to housing needs, whilst the provision of a range of commercial and community uses would help deliver new employment and social infrastructure to meet the needs of the wider town centre communities. It is considered appropriate and accords with the presumption in favour of sustainable development.

3.6 The hybrid planning application was reviewed and considered by the Council's Strategic Planning Committee (SPC) on 28th August 2025. The SPC resolved to grant planning permission for the scheme, noting discussions between the Local Planning Authority and BCR LLP as applicant are underway to seek agreement pursuant to Section 106 of the Town and Country Planning Act 1990.

3.7 Following the grant of planning permission, it is anticipated that two applications may be prepared to vary the planning permission in order to reflect the Romford Ambulance Station remaining on site in substantial form as set out in paragraphs 2.7 to 2.12 above. The first application will be submitted under Section 96a of the Town and Country Planning Act (1990) for non-material amendments to alter the approved description of development on the planning permission. The second application will be submitted under Section 73 of the Town and Country Planning Act (1990) for Minor Material Amendments to the approved drawings and supporting information in order to retain the London Ambulance Service in situ. The variations to the planning permission would principally affect Phase 2 of the development, resulting in a reduction of residential units, including affordable units, loss or

reprovision of flexible health and commercial floorspace, and some loss of public open space. The development, as varied, would comprise up to 896 units in total of which 35% of the total number of habitable rooms will be affordable housing. This equates to a reduction of up to 174 residential units from the original Scheme.

4.0 Consultation

4.1 Details of the community engagement and consultation activity are set out in the Statement of Community Involvement Appendix F. Further public consultation was undertaken ahead of the planning application submissions being made for the Bridge Close scheme.

4.2 The Statement of Community Involvement (SCI) sets out a summary of the stakeholder engagement and community consultation undertaken by BCR LLP during the pre-application stage prior to the submission of the planning application. The consultation process has reflected the Council's and BCR LLP commitment to transparency with the local community and stakeholders at every stage. This has enabled stakeholders and the community to engage with the proposals at the earliest possible opportunity and meet with senior members of the project team throughout the process. The consultation process has provided an inclusive platform for discussion and debate, with over 30 hours of direct engagement with stakeholders, groups and residents.

4.3 To date, the consultation for the proposed redevelopment of Bridge Close has included:

i. Individual meetings with local groups and stakeholders;
ii. Nine rounds of public consultation events at different venues in Romford Town Centre;
iii. Approximately 2,073 residents and stakeholders were engaged during a four-stage consultation from September 2018 to October 2022;
iv. 27 hours of community consultation events;
v. 38,000 invitation letters to residential and commercial properties in the surrounding area, including over 50,000 emails to publicise the events;
vi. A dedicated project website;
vii. Over 116,224 residents viewing social media posts and 11,000 questions answered by respondents online; and
viii. Online and paper questionnaires to encourage responses. As a result, the application has been informed by feedback from 506 questionnaire responses, 30 hours of public consultation carried out over six separate public consultation events, meetings with community groups, councillors and other stakeholders.

4.4 Overall, having viewed the proposals at consultation, approximately 70.9% of residents support the plans for Bridge Close, while 10.6% did not support the plans, and the remaining 18.5% are either undecided or neutral regarding the plans.

5.0 Benefits of the Scheme

5.1 The scheme comprises three phases of housing delivery on Bridge Close and will contribute significantly to achieving the Council's housing targets and wider vision for regeneration.

5.2 The area represents a significant large-scale strategic residential development opportunity in Havering. The Council's intervention through the Land Acquisition Strategy aims to act as a catalyst and encourage the bringing forward of comprehensive development within the area in order to bring about the transformational change and to achieve the identified development outputs and objectives of the Bridge Close scheme.

5.3 The draft Statement of Reasons at Appendix D sets out in detail the rationale and justification for the Scheme, including how the Scheme's development will contribute to the achievement of the Council's regeneration and planning objectives, and result in substantial public benefits, including social value being realised, both within the land included in the Scheme, and as varied pursuant to paragraph 3.7 above, and in the wider area. Members are requested to review the draft Statement of Reasons before reaching a decision.

5.4 The draft Statement of Reasons demonstrates that there is a compelling case in the public interest to make the proposed CPO. Development of the Order Land will itself contribute significantly to the economic, social and environmental well-being of the area and the regeneration of the wider Romford Town Centre.

5.5 The CPO is to be made under the provisions of section 226 of the Town and Country Planning Act 1990, representing the most appropriate mechanism to acquire the land given the scheme is intended to secure regeneration of Bridge Close, delivering not only new market and affordable homes but wider infrastructure including education and health provision, open space, highway improvements and public realm enhancements.

5.6 The Department for Levelling up, Housing and Communities' Guidance on Compulsory Purchase process and the Crichel Down Rules, published 29th October 2015 and last updated in October 2024, advise that in deciding whether or not to confirm a CPO, the Secretary of State can be expected to consider factors including the following:

i. Whether the purpose for which the land is being acquired fits in with the adopted planning framework for the area, including, any non-statutory planning guidance where this has been consulted upon and is intended in due course to be incorporated into the development plan.
ii. The extent to which the proposed purpose of acquisition will contribute to the achievement of the promotion or improvement of the economic, social or environmental wellbeing of the area.
iii. The potential financial viability of the scheme for which the land is being acquired; and
iv. Whether the purpose for which the acquiring authority is proposing to acquire the land could be achieved by any other means.

5.7 Firstly, in relation to i. above, planning policy alignment, the opportunity and need to regenerate the area in and around Bridge Close has been recognised consistently by the Council as Local Planning Authority for more than a decade, dating back to the Local Plan 2005, and is referenced in the Romford Area Action Plan (2008), the Romford Town Centre Development Framework (2015), the Havering Local Plan (2020 – 2031), and the Romford Masterplan. Bridge Close is an integral part of the designation of Romford Town Centre as an Opportunity Area in the London Plan (2021). Further details are set out in the Draft Statement of Reasons attached at Appendix D.

5.8 Secondly, in relation to ii. above, the use of CPO powers to facilitate the regeneration and delivery of new homes (including affordable homes) on the land shown on the CPO Map of the Order Land at Appendix B will contribute towards the Council's promotion of sustainable development with the following well-being benefits:

a) **Economic well-being** of the area

i. New jobs will be created during the construction phase of the housing developments and there will also be opportunities for the local supply chain to benefit.

ii. The new housing will bring new residents to the Borough which will result in additional consumer spend in the local economy enabling local businesses to grow and create new job opportunities.
iii. Enabling the implementation of the infrastructure improvements, inclusive of public amenity.

b) **Social well-being** of the area

i. New affordable homes will be provided for the local workforce, especially lower wage earners.
ii. The provision of new high quality, well designed homes with good daylight, good ventilation and the provision of open space will have positive health and well-being impacts for residents.
iii. Additional Council Tax revenue will be realised by the Council enabling increased spend on local services.
iv. There will be construction training and apprenticeship opportunities for local people.
v. Achievement of the wider regeneration objectives including amenity and infrastructure improvements.
vi. New education and health provision
vii. New highway, public realm and landscape works to facilitate east-west connectivity across Romford and access to Romford Station for local residents.

c) **Environmental well-being** of the area

i. The redevelopment of the land will improve the visual amenity of the area replacing low quality commercial and light industrial uses with high quality new housing developments and public realm.
ii. The new housing will be constructed to high-energy efficiency standards resulting in reductions in energy consumption and carbon emissions.
iii. There will be high quality open space and amenity space within the housing developments.
iv. Enable the revitalisation and reintegration of the River Rom into the local public realm.

5.9 Thirdly, in relation to the viability of the scheme, Bridge Close is brought forward in accordance with the Council's regeneration objectives, including the delivery of a comprehensive and sustainable development, providing much needed housing, including affordable housing, and social infrastructure, funded predominantly from the Housing Revenue Account (HRA).

5.10 BCR LLP and the Council have undertaken extensive financial modelling of the proposed development based on comprehensive assumptions, including the cost of land assembly, development costs and sales revenues. Each of these inputs has been subject to close review and it has been determined, following professional advice, that the development of land within the CPO Map of the Order Land is capable of achieving a positive return in accordance with the BCR LLP Business Plan. On this basis, it is considered that there is a reasonable prospect of the development being delivered in its entirety.

5.11 Viability is underpinned by provision of a funding envelope that is sufficient to deliver the entire development, taking into account all costs of development and financing, and is reviewed and approved by the Council on an annual basis. Whilst the returns on investment fall short of returns otherwise expected in the private sector developments relying on third party bank finance, the project delivers value for money on key regeneration parameters

such as the cost of affordable housing, payback and wider sustainability performance criteria. As such, the project is also viable in regeneration terms.

5.12 To ensure the deliverability of the scheme, the development of land within the CPO Map of the Order Land is to be taken forward by BCR LLP and the Council, utilising a dedicated project team of skilled and experienced external practitioners and contractors who have the experience and expertise to carry out the works, having regard to the mixed-use nature and specific parameters of the scheme. BCR LLP has appointed Atkins Realis and Gardiner & Theobald to advise on procurement, having regard to achieving price certainty, quality in delivery and overall value-for-money. Initial soft market testing has taken place in Quarter 3 of 2025 with tier-one contractors having the requisite expertise and track record of delivering high-quality residential development and schools. Atkins Realis have advised of significant interest in the scheme from a suitable number of qualified contractors to ensure competitive procurement and delivery.

5.13 Finally, in relation to whether there are alternative means of achieving the Council's purposes in acquiring the land, these could not be achieved by any alternative means or by development in other locations.

5.14 The aspiration for a comprehensive development of Bridge Close in accordance with planning policy has been the subject of successive failed attempts by local landowners and developers since the middle to late 1980's. By intervention of the Council through BCR LLP, assembly of the land has progressed significantly. In accordance with CPO Guidance, there have been extensive contacts and discussions with owners and occupiers in relation to the acquisition of their interests, having regard to the parties' relocation requirements, and the principles and parameters set out in policies, plans and strategies of BCR LLP. Negotiations will continue to take place and relocation opportunities will be considered. Owners and occupiers of commercial and residential premises continue to be informed.

5.15 Further to negotiations with owners, approximately 68% of the order land held in private freehold ownership has been acquired. Including unregistered land with the Council as Highway Authority, freehold interests within Council control increases to 70%. Offers are in place on all other interests where owners are known.

5.16 If the CPO is not made, the only way of acquiring the land and interests needed to deliver the development scheme would be by agreement. Whilst it is recognised that implementation of a CPO is a measure of last resort, the history of the site and discussions to date have made it apparent that, unless the CPO is made and confirmed, it is unlikely that BCR LLP would be able to assemble the land and interests in full as required to bring forward the comprehensive development of Bridge Close.

5.17 Alternative Options

5.18 If the CPO is not made, the only way of acquiring the land and interests needed to deliver the development scheme would be by agreement. Following initial discussions, officers consider that securing all of the required interests by negotiation is unlikely to be achieved.

5.19 Careful consideration has been given to the extent of the land and rights included in the CPO and whether it is necessary to include all of these interests. All of the land interests shown on the CPO Map of the Order Land at Appendix B are considered by officers as necessary to ensure delivery of the proposed Scheme and its associated benefits.

5.20 Implementation of the CPO

5.21 Should Cabinet approve the recommendations within this report, the CPO would be made if it continues to be the case that the required land and proprietary interests cannot be secured by agreement alone.

5.22 After the making of the CPO, Order documents would be submitted for confirmation to the Secretary of State for Levelling up, Housing and Communities ("SoS"). A statutory notice regarding the making of the CPO would be served on all affected parties (landowners, occupiers and other third party interests), advertised in the local press, and posted up on the site. The notices served on those affected would be accompanied by the Statement of Reasons, attached at Appendix D, which sets out the background to and justification for the Council using its CPO powers. Service and advertisement of the statutory notices would take place shortly after the CPO is made. The CPO documents would be deposited for inspection by stakeholders within the borough. Service of the appropriate notices highlights the intention to bring forward the Scheme and enables an opportunity for owners and stakeholders to make formal representations/objections to the Order.

5.23 Following service of the notices described above, those affected and members of the public have a period of 28 days within which to make representations, including by objecting to the CPO. The period required by law is a minimum of 21 days, but BCR LLP and the Council would seek to provide the community and those affected with ample opportunity to make representations. The prime objective would be to attain an informed and sensible dialogue and effective community engagement.

5.24 If no objections are received, or withdrawn prior to an Inquiry date, the SoS may either confirm the CPO or return it to the Council for confirmation by the Council. If objections are received and officers and BCR LLP are not able to negotiate the withdrawal of objections, the Secretary of State will likely arrange for a public inquiry or hearing to be arranged by the Planning Inspectorate. Any member of the public may attend and present their support, objection and cross- examine the Council's witnesses regarding the case for confirmation of the CPO.

5.25 Following the Inquiry, the Inspector is likely to be directed to prepare a report inclusive of a recommendation to the Secretary of State as to whether the CPO should be confirmed. The Secretary of State would then make the decision, anticipated early Quarter 1 2027. Following confirmation of the CPO, the Council has a statutory period of 3 years within which to exercise the powers and acquire the land and interests needed for the development. Start on site is currently expected in Quarter 2 of 2027.

5.26 As set out in the Recommendations above, this report seeks authorisation, if required, to exercise the necessary powers to obtain vacant possession in the event that the CPO is confirmed. The General Vesting Declaration establishes a process whereby an advance payment of 90% of the Council's valuation of the property may at the Councils discretion, or upon the request of the relevant owner, be paid to the landowner with the ultimate purchase price resolved in the Upper Tribunal (Lands Chamber).

5.27 Key CPO process risks

5.28 There are number of CPO process risks where management and mitigation is required.

5.29 Firstly, affected parties may fail to be identified in the CPO. In order to manage and mitigate risk, a specialist land referencing firm, Ardent Management LLP, have been appointed to undertake a land referencing exercise. In order to minimise risk, discussions continue to be held and properties visited by BCR LLP and external consultants, with those affected to

assist to identify all the parties with interests in the area. Pursuant to Section 16 of the Local Government (Miscellaneous Provisions) Act 1976, Ardent Management will issue notices to all affected parties, requiring them to furnish the Council with full ownership/occupancy details.

5.30 Secondly, the preparation of CPO and related documents is a technical and complex area, carrying risk of challenge. Accordingly, the Council has retained experienced professional CPO and property advisors, Ardent Management LLP. In addition, where required, proposals and documentation are reviewed by leading counsel.

5.31 Thirdly, there is a risk that owners and occupiers will seek sums in excess of the price cost estimates for the costs of land acquisition. This risk has been mitigated through the receipt of professional valuation advice from Ardent Management LLP and the setting of appropriate budgets, which are subject to continual approval by the BCR LLP Board. In addition, the rights to compensation and methods and procedures for assessing correct amounts are derived from the Compensation Code, setting parameters, which in turn enable consistency, transparency and the ability to forecast with a higher degree of certainty.

5.32 Finally, further to all statutory procedures and reasonable endeavours being undertaken to demonstrate meaningful engagement with occupiers and landowners, there remains a limited risk that the Secretary of State may not confirm the Order or confirm the Order with conditions. In the event that the CPO were not confirmed or subject to onerous conditions, there is a risk that the Scheme would not be delivered as envisioned and the benefits arising from the regeneration of Bridge Close would be significantly delayed or at worst, unlikely to be realised.

5.33 Further risks are set out in exempt Appendix A.

REASONS AND OPTIONS

6.0 Reasons for the decision:

6.1 Utilisation of the Council's CPO powers supports the delivery of the Council's vision and regeneration objectives, enabling the assembly of the site to secure comprehensive residential led mixed-use development on Bridge Close, delivering much needed new housing, social infrastructure and public realm, and providing significant social, economic and environmental benefits for the local community.

6.2 Other options considered:

6.3 Not implementing CPO powers - Not Recommended.

6.4 Without making use of its CPO powers, the Council will be unlikely to be able to acquire the land necessary to promote comprehensive residential-led development on Bridge Close and thereby achieve the regeneration benefits, which are sought.

6.5 Without the intervention of a CPO, the existing commercial and residential land uses would remain in place and infrastructure would not be improved. It would also not be possible to facilitate comprehensive mixed-use development. Any development that would be brought forward would be likely to be piecemeal and potentially fall short of the aspiration of planning policy and the quality anticipated in the planning application underpinning the Scheme. There would be material risk that any potential alternative development would fail to deliver the required mix, tenures or typology necessary to meet the Council's vision and the objectives of the Bridge Close masterplan.

6.6 If the CPO were not made, the only way of acquiring the land and interests required to deliver the initial phases of housing development would be by agreement. Unless a CPO is made and confirmed, it is unlikely that BCR LLP would be able to assemble the land and interests required for development within a reasonable timescale or for a reasonable purchase price. The consequences of this would be that housing and social infrastructure delivery would be delayed, possibly indefinitely, including the provision of much needed affordable housing, health and education provision.

6.7 Careful consideration has been given to the extent of the land and rights included in the CPO and whether it is necessary to include all of these. All of the land shown on the plan at Appendix B is necessary to ensure that the Scheme is able to be delivered.

IMPLICATIONS AND RISKS

7.0 FINANCIAL IMPLICATIONS AND RISKS

7.1 Further to the approval of the budget underpinning the Bridge Close Regeneration LLP Business Plan 2025-2026 by Full Council on 5th February 2025, funds are in place to undertake the development in full without recourse to third party financing. Key risks relating to the CPO process are set out at paragraphs 5.27 to 5.32 above.

7.2 Financial implications and risks are addressed within the exempt Appendix A.

8.0 LEGAL IMPLICATIONS AND RISKS

8.1 Section 226(1)(a) of the Town and Country Planning Act 1990 (as amended by the Planning and Compulsory Purchase Act 2004), provides that a local authority shall, on being authorised to do so by the Secretary of State, have the power to acquire compulsorily any land in their area if they are satisfied that the acquisition will facilitate the carrying out of development, redevelopment or improvement and is necessary to the achieve proper planning on or in relation to the land …".

8.2 The power set out in s.226(1)(a) is subject to the limitation set out in s.226(1A) which provides that the exercise of the power under that subsection must not be exercised unless the authority thinks that the development, redevelopment, etc. "is likely to contribute to the achievement of one or more of the following objects:

i. The promotion or improvement of the economic well-being of their area;

ii. The promotion or improvement of the social well-being of their area;
iii. The promotion or improvement of the environmental well-being of their area."

8.3 With regard to the objects set out subsection 226(1)(a), officers set out in the report that an intended purpose of the Scheme is to secure development to enable the delivery of homes, particularly the delivery of affordable homes. As such the subject scheme, would, as a matter of principle, be capable of fulfilling all three of the specified objects, and in particular the "promotion or improvement of social well-being".

8.4 The Government's advice on the use of compulsory purchase powers generally, and the use specifically of the power set out in s.226(1)(a) of the Town and Country Planning Act 1990 is set out in its Guidance. The Guidance represents the principal matters, which the Council, should it seek to acquire the site by use of CPO powers, will need to be in a position to demonstrate in evidence both when making and when seeking confirmation of that order.

8.5 In summary, the Council must be able to demonstrate, in addition to the legal requirements referred to above arising from the statutory enabling power, that:

i. The development sought to be achieved on that land is in accordance with an up to date development plan or, a non-statutory planning framework adopted following public consultation;
ii. The scheme will further social, economic and/or environmental well-being;
iii. There are no reliable alternative means to deliver the scheme in the time period required; this requirement in practice will include demonstrating engagement with the landowners and occupiers to being forward the required form of development;
iv. The acquisition of the land can be funded and the scheme can viably and physically be delivered with no impediments.

8.6 These matters have been addressed above.

8.7 The overarching principle is that the local authority, in seeking to exercise powers of compulsory acquisition, is able to demonstrate a compelling case in the public interest for the exercise of those powers. Evidence is also required to demonstrate that there is no impediment to enable the delivery of the development the proposed acquisition is intended to facilitate. These matters have been addressed above but, in summary,

i. Planning permission or at least a planning committee resolution to grant permission should be in place for the development before making the CPO. Whilst this is not a strict requirement prior to making the CPO under the Guidance, it makes it easy to demonstrate that there are no planning impediments to the development. As set out above, on 28th August 2025, Strategic Planning Committee resolved to grant planning permission for the scheme. Once the outline planning permission is issued, the Planning Authority could make a statement, in support the Council's case at an Inquiry that there are no obvious reasons which are likely to impede the grant of reserved matters outstanding consents.
ii. Financial and physical resources are available to acquire the land and to deliver the scheme. The Bridge Close Regeneration LLP is operating with governance, funding and development phasing already in place (see paragraphs 5.9 to 5.11 above and Section 10 in the Statement of Reasons);
iii. The context of acquisition sought to be made being that the development proposed, is grounded in a "clear strategic framework" and "planning framework", to which the development of the land proposed and for which acquisition is required will facilitate (see paragraphs 3.3 to 3.6 above and Sections 6, 7 and 8 in the Statement of Reasons);

iv. Negotiations have been undertaken with landowners and occupiers, with business and residential relocation strategies in place. Therefore, in line with the Guidance, the CPO is being promoted as a last resort (see paragraphs 1.7, 1.10 and 2.17 above and Section 15 in the Statement of Reasons);

v. The regeneration of Bridge Close is a key deliverable for the Council as set out in the Local Plan, (see paragraphs 3.4 and 5.7 above and Section 6 and Section 7 in the Statement of Reasons). The scheme seeks to avoid development in a piecemeal fashion and of a scale that can make meaningful contributions towards social infrastructure;

vi. Through delivery of the Bridge Close scheme the housing stock will be significantly improved with an increased supply of Affordable Housing located in the administrative area of the borough (paragraphs 3.1 to 3.6 above and Section 7 in the Statement of Reasons); and

vii. Construction phases of the development will include training and employment opportunities for residents within the borough and contribute to social infrastructure.

8.8 Consideration has been given to the provisions of the Human Rights Act 1998 including Article 8 (respect for private life and family life and home) and Article 1 of the First Protocol (right to peaceful enjoyment of possessions) as set out in paragraphs 12.4 to 12.6 in the Statement of Reasons (and addressed further below). A decision to make Compulsory Purchase Orders must strike a fair balance between public interest in the regeneration of the land and interference with private rights. Bearing in mind the provisions for compensation to be payable and the compelling case in the public interest for the acquisition of the interest, it is considered that the interference with private property rights is proportionate and strikes a fair balance between the public interest and the interests of landowners and occupiers in compliance with Article 1 of the First Protocol.

8.9 Section 247 of the Town and Country Planning Act 1990 ("the Act") empowers the Council to, by order, authorise the stopping up of any highway within the borough to enable development to be carried out in accordance with planning permission in this case the hybrid planning permission P1765.23, which is expected imminently. Any risks associated with the stopping up of the highway is mitigated by the existence of the Planning Permission as in the event of a referral to the Mayor of London, the planning merits of the scheme cannot be delved into. The Council will further manage risk

8.10 By way of conclusion, s.226 of the Town and Country Planning Act 1990 represents a basis available to the Council to acquire the site. The Council will need to be satisfied that the statutory tests and policy tests set out in the Guidance for the making and confirmation of CPO pursuant to that statutory power are met, including that all occupier negotiations have been undertaken or there is a clear plan to undertake such discussions in a meaningful way prior to a request for confirmation of CPO. As set out in the earlier sections of this Report, the statutory grounds are made out in full and the above contained within this report is considered to form a rational basis upon which the requested decisions can be made. If there are material changes to the circumstances affecting the basis on which Recommendations above are advanced, officers shall refer the decision back to Cabinet for determination.

9.0 HUMAN RESOURCES IMPLICATIONS AND RISKS (AND ACCOMMODATION IMPLICATIONS WHERE RELEVANT)

9.1 There are no Human Resource implications of, or risks relating to, the proposed decision.

9.2 The Regeneration Service continues to dedicate resource to the programme management and delivery of the land assembly and compulsory purchase work stream. Current and

anticipated future resource requirements are included in the budget underpinning the BCR LLP Business Plan 2025-2026 as approved by Cabinet on 5th February 2025.

10.0 EQUALITIES AND SOCIAL INCLUSION IMPLICATIONS AND RISKS

10.1 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.

10.2 Under the Equality Act 2010, 'Protected characteristics', are age, sex, race, disability, sexual orientation, marriage and civil partnerships, religion or belief, pregnancy and maternity and gender reassignment.

10.3 The Equality Impact Assessment for Bridge Close, reported to Cabinet in November 2017, subsequently reviewed in September 2019, November 2021, June 2023, October 2024 and October 2025 as attached at Appendix E, flows from the Council's Equality Impact Assessments for the Havering Estate Renewal Programme and the Local Lettings Plan. To inform the Bridge Close Equality Impact Assessment, engagement with affected residents and businesses has been undertaken, alongside a review of the wider Romford Town ward to establish a demographic profile of those affected. This considered the impact of Scheme proposals on these stakeholders, within the context of the protected characteristics.

10.4 The Equalities Impact Assessments provide that, generally, the redevelopment of the site improves the area over the existing situation, including improving housing quality, urban realm, security, access to jobs, and education provision, all of which may mitigate against potential differential impacts on a number of protected characteristic groups.

10.5 At present the properties within the CPO blue line area do not reflect a mixed and balanced community, with a heavy bias towards commercial and inappropriate mainly private housing stock. The Scheme proposals seek to address this imbalance through the delivery of a range of residential tenures across the site for example, private housing, a new range of intermediate housing, affordable rent, a wider range of unit sizes across all tenures and 10% of all residential units meeting Wheelchair Standards. Equally, due regard has been taken when considering design and masterplanning principles, and that measures have been included to mitigate against potential differential impacts which may be experienced by some protected characteristic groups.

10.6 Overall, there may be some adverse impact from the redevelopment of Bridge Close, particularly as a result of the displacement and disruption caused to existing businesses, staff, residents and their families, and some religious groups. To reduce this impact, the Council continues to work closely with those affected, offering a full package of support, through access to dedicated advice and assistance, through the offer of financial compensation, by offering a range of options to help residents move to a new home and providing businesses and other groups with help in finding and relocating to new premises, as well as additional support to encourage business improvement and sustainability in the future.

10.7 The Council believes that the benefits of the Bridge Close redevelopment will outweigh some of the adverse impacts identified. The redevelopment of Bridge Close is predicted to

be largely positive, presenting far reaching benefits and opportunities for Romford, Havering and its diverse communities. This includes making a significant contribution to the provision of new and high quality mixed tenure housing, which will be well managed and sustainable, helping to reduce fuel poverty and contributing to the quality of life for people of all ages, genders, ethnicities and faiths/beliefs. Regeneration of the area will also support economic growth and prosperity across Havering, through creating new mixed workspace and community facilities, which will support business growth, enterprise and inward investment, as well as local jobs, apprenticeships and wider employment opportunities. The development will help to create a greater sense of place and platform for learning, creativity and culture, whilst also supporting education, health, leisure and recreation. The introduction of robust estate management services across the development will aid in preventing crime and social disorder, whilst the new neighbourhood will encourage social inclusion, community cohesion and equality, helping to foster positive relations amongst existing and new communities, including members of the community sharing a Protected Characteristic.

10.8 The EqIA of October 2025 concludes the Council has had due regard to its Public Sector Equality Duty under the Equality Act 2010 when considering the impact of the Scheme on residential and commercial owners and occupiers sharing a protected characteristic, and that, where possible, measures have been included to mitigate against potential differential impacts which may be experienced by some protected characteristic groups. In addition to designing and masterplanning the Scheme having regard to members of the community sharing a Protected Characteristic, the Council has sought to mitigate against any adverse impacts through a range of measures focused on engagement, rehousing and relocation assistance (for both residents and commercial units) and compensation options in order to realise the benefits associated with the redevelopment.

10.9 Officers consider the existing Equality Impact Assessments for Bridge Close, as updated in October 2025, continues to be of relevance to the project and for the purpose of seeking the approval by Cabinet for the delegation of powers for the making of the CPO.

11.0 HEALTH AND WELLBEING IMPLICATIONS AND RISKS

11.1 The Council is committed to ensuring the health and well-being of its residents. The decision relates to the delegation of authority to make the CPO subject to appropriate consultation as set out in the Recommendations above. This decision, if approved and fully implemented by the making of the CPO, facilitates the delivery of the regeneration of Bridge Close and will have health and well-being implications for residents.

11.2 As such, an updated Health Impact Assessment from September 2024 concluded that the overall nature of the identified impacts is positive or neutral, including positive impacts on housing provision, mental health and wellbeing of the new residents. Opportunities for improved health and wellbeing arise from regeneration deliverables, including access to community green and open spaces, multiple and well-connected public spaces, improved infrastructure for active travel, high quality housing provision, and through associated prospects for business and employment growth. This is supported by efforts to implement design that is high quality, accessible and sustainable.

11.3 There may be some adverse impact from the redevelopment of Bridge Close, particularly as a result of the displacement and disruption caused to existing businesses, staff, residents and their families. This may take the form of negative mental wellbeing associated with loss of autonomy due to forced displacement, loss of social connectivity or loss of income. A framework of support and compensation is in place to mitigate these potential

impacts and a number of recommendations have been proposed or are underway as the scheme is progressed through detailed design, procurement and delivery.

11.4 There is also the potential for negative health and wellbeing impacts arising during the course of the construction phase. A further Health Impact Assessment would be carried out prior to the commencement of works to identify and maximise any positive impacts and to identify and highlight measures to mitigate against any negative impacts that may arise during the construction or post-contraction phases. In circumstances where construction would be commenced, management plans will be in place to reduce noise, dust and other potential sources of disruption to minimise the potential impacts on resident health and wellbeing.

11.5 It is anticipated that the longer term benefits outweigh the potential short term adverse impacts. More efficient use of land, high design standards, sustainable solutions and the provision of social infrastructure ensure that the proposed uses are the best uses of the land. The wider socio-economic and environmental benefits are likely to enhance the health and well-being impacts of the scheme.

12.0 ENVIRONMENTAL AND CLIMATE CHANGE IMPLICATIONS AND RISKS

12.1 Proposals for the regeneration of Bridge Close have been developed to meet the requirements of local, regional and national policies aligned with sustainability and their associated targets. As such, the sustainability strategy for the scheme has been developed and continues to be progressed with reference to the London Plan (2021), the Greater London Authority's (GLA's) Sustainable Design and Construction Supplementary Planning Guidance (SPG) (2014), as well as the Council's planning policies, including the Local Plan 2016-2031.

12.2 The sustainability strategy is comprehensive with proposals to meet with requirements in the following principal domains:

i. **Resource management**: considering issues such as optimising the use of land, the energy strategy, water efficiency, environmental impacts of materials, considerate waste management, nature conservation and biodiversity;
ii. **Climate change adaptation**: considering increased temperature and drought risks such as overheating, providing planting and green spaces, and surface water flooding and sustainable drainage;
iii. **Pollution management**: considering issues such as land contamination, air quality and noise, light and water pollution; and
iv. **Socioeconomics**: considering the benefits the proposed Development will have on the social and economic systems.

12.3 The review has been comprehensive across all relevant areas and a number of studies, surveys and assessments have been completed to ensure compliance and mitigate against any potential adverse impacts. Moreover, development proposals, including the approach to master planning and individual plot designs, take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption and any wider potential environmental impacts. In relation to climate change adaptation implications and risks, the following strategies are in place and continue in development:

i. **Energy Strategy** – proposals focus on communal centralised energy provision using air source heat pump technology and the opportunity to connect in the future to wider heating distribution networks as required. Passive design measures, including the glazing specification, shading and use of thermal mass with night-time ventilation, continue to be refined to meet with good practice recommendations to

reduce overheating and the need for energy-intensive air conditioning to achieve thermal comfort.

ii. **Flood Risk Assessment** – proposals mitigate against the risk of flooding by raising finished floor levels where possible, implementation of a surface water management strategy using sustainable drainage systems, increasing heat and drought resistant planting and green cover as well as naturalising of the River Rom in consultation with the Lead Local Flood Authority and the Environment Agency.

iii. **Climate Change and Net Zero Carbon Review** – the development is designed in line with the "Be Lean, Be Clean, Be Green" energy hierarchy to achieve net zero compliance, including reducing CO2 emissions for both domestic and non-domestic buildings to achieve at least a 35% on-site reduction against the baseline as set out in Building Regulations Part L 2013. Furthermore, the London Plan targets to achieve 10% carbon savings through demand reduction measures for residential development and 15% for non-residential development are also achieved.

12.4 In summary, the proposals for development support the transition to a low carbon future and have strategies in place for the best practice management of wider environmental risks and implications.

BACKGROUND PAPERS

None.

APPENDICES

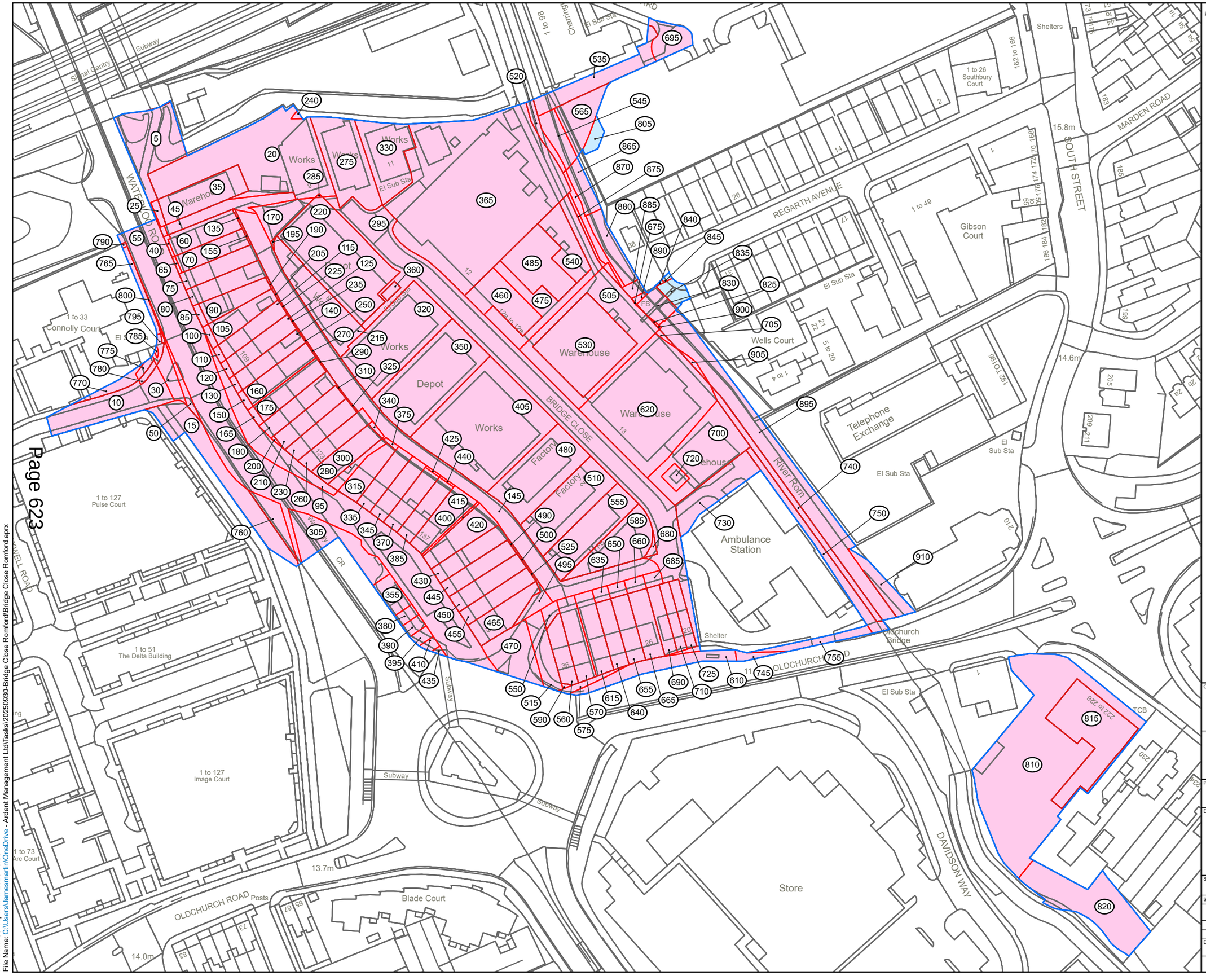
Appendix A	**Financial Risks and Implications (Exempt)**
Appendix B	**Map of the Order Land (Public)**
Appendix C	**Draft Book of Reference (Schedule Interests) (Public)**
Appendix D	**Draft Statement of Reasons (Public)**
Appendix E	**Draft Equalities Impact Assessment (Public)**
Appendix F	**Draft Statement of Community Involvement (Public)**

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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Client: THE LONDON BOROUGH OF HAVERING

Designer: Ardent

Project: BRIDGE CLOSE ROMFORD

Drawing Title: LAND PLAN

Status	DRAFT	Revision	009
		Date	30/09/2025
Scale	1:1,250 @ A3	Spatial Reference System	British National Grid
Drawn By	Checked By	Approved By	
J. MARTIN	E.CORNELIUS		

Drawing reference: 030_ARDG_LBH_BR_CL_LP_8

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Plot Date: 30 September 2025 16:33
File Name: C:\Users\JamesmartinOneDrive - Ardent Management Ltd\Tasks\20250930-Bridge Close Romford\Bridge Close Romford.aprx

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LONDON BOROUGH OF HAVERING (BRIDGE CLOSE – RESIDENTIAL)

COMPULSORY PURCHASE ORDER 202X

London Borough of Havering (Bridge Close - Residential) Compulsory Purchase Order 202X

Table 1

Number on Map	Extent, Description and Situation of the Land	Qualifying persons under section 12(2)(a) of the Acquisition of Land Act 1981 – Name and Address			
		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
5	All interests in 483 square metres of trees, shrubbery and public footway; south of Subway and north of Old Church Road, Romford *(Unregistered Land - Absolute Freehold)*	Unregistered/Unknown	-	-	Unknown
10	All interests in 424 square metres of public highway (Union Road), verges and footways, Romford *(EGL319779 - Absolute Freehold)*	Barking, Havering And Redbridge Hospitals National Health Service Trust Queens Hospital Rom Valley Way Romford RM7 0AG	-	-	Barking, Havering And Redbridge Hospitals National Health Service Trust Queens Hospital Rom Valley Way Romford RM7 0AG
15	All interests in 485 square metres of trees, shrubbery, public footway and cycle lane; west of Waterloo Road, and south of Union Road, Romford *(EGL520145 - Absolute Freehold)*	George Wimpey East London Limited Gate House Turnpike Road High Wycombe HP12 3NR	-	-	George Wimpey East London Limited Gate House Turnpike Road High Wycombe HP12 3NR

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
20	All interests in 1210 square metres of Havering Islamic Cultural Centre car park; south of the Subway, and east of Waterloo Road, Romford *(EGL345373 - Absolute Freehold)*	[redacted]	-	-	[redacted]
25	All interests in 23 square metres of public footway; south of the Subway, east ofWaterloo Road, Romford *(EGL89208 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
30	All interests in 91 square metres of pedestrian island; west of Waterloo Road and east of Union Road, Romford	Barking, Havering And Redbridge Hospitals National Health Service Trust	-	-	Barking, Havering And Redbridge Hospitals National Health Service Trust

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
	(EGL507435 - Absolute Freehold)	Queens Hospital Rom Valley Way Romford RM7 0AG			Queens Hospital Rom Valley Way Romford RM7 0AG
35	All interests in 315 square metres of Havering Islamic Cultural Centre; south of subway, east of Waterloo Road, Romford *(EX31291 - Absolute Freehold)*	[redacted]	-	-	[redacted]

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
40	All interests in 10 square metres of public footway; south of the subway, east ofWaterloo Road, Romford *(EGL69351 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
45	All interests in 187 square metres of walkway and accessway leading to Havering Islamic Cultural Centre; south of Subway, and east of Waterloo Road, Romford *(NGL126397 - Absolute Freehold)*	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD	-	-	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD
50	All interests in 48 square metres of public footway; east of Union Road and west of Waterloo Road, Romford *(EGL22893 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
55	All interests in 2617 square metres of public Highway (Waterloo Road), Romford	Unregistered/Unknown	-	-	Unregistered/Unknown

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
	(Unregistered Land)				
60	All interests in 204 square metres of residential property (95, Waterloo Road), Romford *(EX24703 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
65	All interests in 7 square metres of public footway; south of the subway, and east of Waterloo Road, Romford *(EGL69538 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
70	All interests in 172 square metres of residential property (97, Waterloo Road), Romford *(P25516 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
75	All interests in 178 square metres of public footway; south of subway, and east of Waterloo Road, Romford *(EGL148721 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
80	All interests in 188 square metres of public footway; south of subway, and east of Waterloo Road, Romford *(EGL24292 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
85	All interests in 19 square metres of public footway; south of subway, and east of Waterloo Road, Romford *(EGL67954 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
90	All interests in 166 square metres of residential property (103, Waterloo Road), Romford	[redacted]	-	-	[redacted]

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
	(EGL19634 - Absolute Freehold)	[redacted]			[redacted]
95	All interests in 315 square metres of public footway, south of subway, and east of Waterloo Road, Romford *(P22109 - Absolute Freehold)*	[redacted]	-	-	[redacted]
100	All interests in 21 square metres of public footway; south of subway, and east of Waterloo Road, Romford *(EGL68390 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
105	All interests in 174 square metres of residential property (105, Waterloo Road), Romford *(EGL50385 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
110	All interests in 14 square metres of public footway; south of subway, and east of Waterloo Road, Romford *(EGL96613 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
115	All interests in 162 square metres of residential garden (107, Waterloo Road), Romford *(EX12690 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
120	All interests in 14 square metres of public footway; south of subway, and east of Waterloo Road, Romford *(EGL72373 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
125	All interests in 176 square metres of residential garden (109, Waterloo Road), Romford	London Borough Of Havering Town Hall	-	-	London Borough Of Havering Town Hall

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
	(P27962 - Absolute Freehold)	Main Road Romford RM1 3BD			Main Road Romford RM1 3BD
130	All interests in 14 square metres of public footway; south of subway, and east of Waterloo Road, Romford *(EGL73359 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
135	All interests in 5 square metres of public highway (Bridge Close) and verges, Romford *(EGL69351 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
140	All interests in 170 square metres of garage forming part of residential garden (111, Waterloo Road), Romford *(P30016 - Absolute Freehold)*	[redacted]	-	-	[redacted]

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
145	All interests in 1296 square metres of public highway (Bridge Close) and verges, Romford *(Unregistered Land - Absolute Freehold)*	Unregistered/Unknown	-	-	Unknown
150	All interests in 17 square metres of public footway; south of subway, and east of Waterloo Road, Romford *(EGL73174 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
155	All interests in 4 square metres of public highway (Bridge Close) and verges, Romford *(EGL69538 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
160	All interests in 195 square metres of residential property (113, Waterloo Road), Romford	London Borough Of Havering Town Hall Main Road	-	-	London Borough Of Havering Town Hall Main Road

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
	(EGL16503 - Absolute Freehold)	Romford RM1 3BD			Romford RM1 3BD
165	All interests in 17 square metres of public footway; south of subway, and east of Waterloo Road, Romford *(EGL68107 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
170	All interests in 156 square metres of public highway (Bridge Close) and verges, Romford *(EX90125 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
175	All interests in 187 square metres of residential property (115, Waterloo Road), Romford *(EGL113191 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
180	All interests in 189 square metres of residential property (117, Waterloo Road), Romford *(EGL26109 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
190	All interests in 3 square metres of public highway (Bridge Close) and verges, Romford *(EGL67954 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
195	All interests in 3 square metres of public highway (Bridge Close) and verges, Romford *(EGL34845 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
200	All interests in 4 square metres of public footway; south of subway, and east of Waterloo Road, Romford	London Borough Of Havering Town Hall	-	-	London Borough Of Havering Town Hall

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
	(EGL82468 - Absolute Freehold)	Main Road Romford RM1 3BD			Main Road Romford RM1 3BD
205	All interests in 3 square metres of public highway (Bridge Close) and verges, Romford *(EGL68390 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
210	All interests in 179 square metres of residential property (119, Waterloo Road), Romford *(EGL39350 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
215	All interests in 422 square metres of accessway, footway and hardstanding; east of Bridge Close and south of Havering Islamic Centre, Romford *(EGL297926 - Absolute Freehold)*	Bridge Close Regeneration LLP Town Hall Main Road Romford	-	-	-

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
	(BGL114001 - Absolute Leasehold)	RM1 3BD			
220	All interests in 949 square metres of commercial premises (7 Bridge Close), Romford *(EX55423 - Absolute Freehold)*	[redacted]	-	-	[redacted]
225	All interests in 3 square metres of public highway (Bridge Close) and verges, Romford *(EGL96613 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
230	All interests in 178 square metres of residential property (121, Waterloo Road), Romford *(P25511 - Absolute Freehold)*	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD	-	-	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD
235	All interests in 3 square metres of public highway (Bridge Close) and verges, Romford	London Borough Of Havering Town Hall	-	-	London Borough Of Havering Town Hall

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	(EGL72373 - Absolute Freehold)	Main Road Romford RM1 3BD			Main Road Romford RM1 3BD
240	All interests in 6 square metres of trees, shrubbery and hardstanding forming part of Havering Islamic Cultural centre car park, Romford *(EGL345373 - Absolute Freehold)*	[redacted]	-	-	[redacted]
250	All interests in 3 square metres of public highway (Bridge Close) and verges, Romford *(EGL73359 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford	-	-	London Borough Of Havering Town Hall Main Road Romford

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		RM1 3BD			RM1 3BD
260	All interests in 174 square metres of residential property (123, Waterloo Road), Romford *(NGL145749 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
270	All interests in 3 square metres of public highway (Bridge Close) and verges, Romford *(EGL73174 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
275	All interests in 494 square metres of commercial premises (10, Bridge Close), Romford *(EX64526 - Absolute Freehold)*	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD	-	-	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
280	All interests in 190 square metres of residential property (125, Waterloo Road), Romford *(P26160 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
285	All interests in 2 square metres of accessway and hardstanding; north of Bridge Close, and south of Subway, Romford *(EGL345373 - Absolute Freehold)* *(EX55423 - Absolute Freehold)*	[redacted]	-	-	[redacted]

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
		[redacted]			[redacted]
290	All interests in 3 square metres of public highway (Bridge Close) and verges, Romford *(EGL68107 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
295	All interests in 1871 square metres of public highway (Bridge Close) and verges, Romford *(NGL126397 - Absolute Freehold)*	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD	-	-	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD
300	All interests in 66 square metres of residential property (127, Waterloo Road), Romford *(EGL70210 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
305	All interests in 324 square metres of public Highway (Waterloo Road) and verges, Romford *(NGL58133 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
310	All interests in 2 square metres of public highway (Bridge Close) and verges, Romford *(EGL82468 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
315	All interests in 163 square metres of residential property (127, Waterloo Road), Romford *(P30022 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
320	All interests in 768 square metres of commercial premises (6, Bridge Close), Romford	Bridge Close Regeneration LLP Town Hall	-	-	Bridge Close Regeneration LLP Town Hall

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London Borough of Havering (Bridge Close - Residential) Compulsory Purchase Order 202X

Number on Map	Extent, Description and Situation of the Land	Qualifying persons under section 12(2)(a) of the Acquisition of Land Act 1981 – Name and Address			
		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
	(EX50627 - Absolute Freehold)	Main Road Romford RM1 3BD			Main Road Romford RM1 3BD
325	All interests in 3 square metres of public highway (Bridge Close) and verges, Romford *(EGL86728 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
330	All interests in 409 square metres of commercial premises (11, Bridge Close), Romford *(EGL457852 - Absolute Freehold)*	[redacted]	-	Iconic Plastics Ltd 11 Bridge Close Romford RM7 0AU	[redacted] Iconic Plastics Ltd 11 Bridge Close Romford RM7 0AU
335	All interests in 155 square metres of residential property (129, Waterloo Road), Romford	London Borough Of Havering Town Hall Main Road	-	-	London Borough Of Havering Town Hall Main Road

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Number on Map	Extent, Description and Situation of the Land	Qualifying persons under section 12(2)(a) of the Acquisition of Land Act 1981 – Name and Address			
		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
	(P30175 - Absolute Freehold)	Romford RM1 3BD			Romford RM1 3BD
340	All interests in 11 square metres of public highway (Bridge Close), parking space and verges, Romford *(EGL86654 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
345	All interests in 157 square metres of residential property (131, Waterloo Road), Romford *(EGL23519 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
350	All interests in 807 square metres of commercial premises (5, Bridge Close), Romford *(EX48000 - Absolute Freehold)*	[redacted]	-	Superior Food Products (Essex) Limited 114 Hamlet Court Road Westcliff-On-Sea SS0 7LP	[redacted]

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
		[redacted]			[redacted] Superior Food Products (Essex) Limited 114 Hamlet Court Road Westcliff-On-Sea SS0 7LP
355	All interests in 102 square metres of public footway and accessway leading to underground subway; east of Waterloo Road, and north of Old Church Road, Romford *(BGL78359 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
360	All interests in 22 square metres of electrical generator and enclosure, (Bridge Close), Romford *(EX51051 - Absolute Freehold)* *(NGL126397 - Absolute Freehold)*	Eastern Power Networks Plc Newington House 237 Southwark Bridge Road London SE1 6NP Bridge Close Regeneration LLP Town Hall Main Road Romford	-	-	Eastern Power Networks Plc Newington House 237 Southwark Bridge Road London SE1 6NP Bridge Close Regeneration LLP Town Hall Main Road Romford

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
		RM1 3BD			RM1 3BD
365	All interests in 2774 square metres of commercial premises (12, Bridge Close), Romford *(EX53020 - Absolute Freehold)* *(EGL170603 - Absolute Leasehold)*	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD	[redacted]	-	[redacted]
370	All interests in 155 square metres of residential property (133, Waterloo Road), Romford *(EGL17735 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
375	All interests in 8 square metres of public highway (Bridge Close), parking space and verges, Romford *(EGL62416 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
380	All interests in 34 square metres of accessway leading to underground subway; east of Waterloo Road, and north of Old Church Road, Romford *(EGL35301 - Absolute Freehold)*	Greater London Authority City Hall Kamal Chunchie Way London E16 1ZE	-	-	Greater London Authority City Hall Kamal Chunchie Way London E16 1ZE
385	All interests in 158 square metres of residential property (135, Waterloo Road), Romford *(P30020 - Absolute Freehold)*	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD	-	-	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD
390	All interests in 35 square metres of accessway leading to underground subway; east of Waterloo Road, and north of Old Church Road, Romford *(EGL12750 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
395	All interests in 31 square metres of accessway leading to underground subway; east of Waterloo Road, and north of Old Church Road, Romford	London Borough Of Havering Town Hall Main Road Romford	-	-	London Borough Of Havering Town Hall Main Road Romford

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
	(BGL83538 - Absolute Freehold)	RM1 3BD			RM1 3BD
400	All interests in 215 square metres of residential property (137, Waterloo Road), Romford *(P31994 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
405	All interests in 1316 square metres of commercial premises (4, Bridge Close), Romford *(EX52545 - Absolute Freehold)* *(EGL411832 - Absolute Leasehold)*	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD	Simply Logistics Limited 12 Gateway Mews Bounds Green London N11 2UT	-	Simply Logistics Limited 12 Gateway Mews Bounds Green London N11 2UT
410	All interests in 21 square metres of accessway leading to underground subway; east of Waterloo Road, and north of Old Church Road, Romford *(EGL14966 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
415	All interests in 21 square metres of residential property (137, Waterloo Road), Romford *(P24427 - Absolute Freehold)*	[redacted]	-	-	[redacted]
420	All interests in 227 square metres of residential property (139, Waterloo Road), Romford *(EGL14280 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
425	All interests in 5 square metres of public highway (Bridge Close), parking space and verges, Romford *(EGL58303 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
430	All interests in 184 square metres of residential property (141, Waterloo Road), Romford *(P30017 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford	-	-	London Borough Of Havering Town Hall Main Road Romford

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
		RM1 3BD			RM1 3BD
435	All interests in 8 square metres of accessway leading to underground subway; east of Waterloo Road, and north of Old Church Road, Romford *(EGL30385 - Absolute Freehold)*	Greater London Authority City Hall Kamal Chunchie Way London E16 1ZE	-	-	Greater London Authority City Hall Kamal Chunchie Way London E16 1ZE
440	All interests in 4 square metres of public highway (Bridge Close), parking space and verges, Romford *(EGL48483 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
445	All interests in 170 square metres of residential property (143, Waterloo Road), Romford *(EGL175667 - Absolute Freehold)*	[redacted]	-	-	[redacted]

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
		[redacted]			[redacted]
450	All interests in 186 square metres of residential property (145, Waterloo Road), Romford *(P38510 - Absolute Freehold)*	[redacted]	-	-	[redacted]
455	All interests in 170 square metres of residential property (147, Waterloo Road), Romford *(NGL130095 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
460	All interests in 293 square metres of commercial premises (12A, Bridge Close), Romford *(EGL451223 - Absolute Freehold)* *(BGL113941 - Absolute Leasehold)* *(EGL140298 - Absolute Leasehold)*	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD A.C.Preou Limited (trading as A C Preou) 8 Radford Cresent Billericay	-	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD A.C.Preou Limited (trading as A C Preou) 8 Radford Cresent Billericay

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
			CM12 0DU		CM12 0DU
465	All interests in 214 square metres of residential property (149, Waterloo Road), Romford *(NGL142743 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
470	All interests in 291 square metres of public highway (Bridge Close), and pedestrian crossing, Romford *(NGL153241 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
475	All interests in 401 square metres of commercial premises (12A Bridge Close, 12B Bridge Close and 12C Bridge Close), Romford *(EGL451223 - Absolute Freehold)* *(EGL140298 - Absolute Leasehold)*	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD	-	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
			A.C.Preou Limited (trading as A C Preou) 8 Radford Cresent Billericay CM12 0DU Scylla Select Ltd S B C House Restmor Way Wallington SM6 7AH		A.C.Preou Limited (trading as A C Preou) 8 Radford Cresent Billericay CM12 0DU Scylla Select Ltd S B C House Restmor Way Wallington SM6 7AH
480	All interests in 586 square metres of commercial premises (3, Bridge Close), Romford *(EX51382 - Absolute Freehold)*	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD	Direct Business Development Ltd 8a Kingsway House King Street Bedworth CV12 8HY		Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD Direct Business Development Ltd 8a Kingsway House King Street Bedworth CV12 8HY

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
485	All interests in 377 square metres of commercial premises (12C, Bridge Close), Romford *(EGL451223 - Absolute Freehold)* *(BGL77963 - Absolute Leasehold)* *(EGL140298 - Absolute Leasehold)*	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD London Borough Of Havering Town Hall Main Road Romford RM1 3BD Scylla Select Ltd S B C House Restmor Way Wallington SM6 7AH	-	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD Scylla Select Ltd S B C House Restmor Way Wallington SM6 7AH
490	All interests in 4 square metres of public highway (Bridge Close) and verges, Romford *(EGL94900 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford	-	-	London Borough Of Havering Town Hall Main Road Romford

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
		RM1 3BD			RM1 3BD
495	All interests in 66 square metres of public highway (Bridge Close) and verges, Romford *(EGL47912 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
500	All interests in 4 square metres of public highway (Bridge Close) and verges, Romford *(EGL88612 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
505	All interests in 551 square metres of hardstanding and car park for commercial premises (13, Bridge Close), Romford *(EX61594 - Absolute Freehold)*	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD	-	-	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
510	All interests in 505 square metres of commercial premises (2B, Bridge Close), Romford *(EX51020 - Absolute Freehold)*	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD	Euro's Best Profiles Ltd 407 Ley Street Ilford IG1 4AB		Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD Euro's Best Profiles Ltd 407 Ley Street Ilford IG1 4AB
515	All interests in 180 square metres of public highway (Bridge Close), footway and shrubbery, Romford *(P30262 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
520	All interests in 64 square metres of river (River Rom) and bed thereof, trees and shrubbery; south of subway, and west of Waterloo Road, Romford *(Unregistered Land)*	Unregistered/Unknown	-	-	Unknown

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
525	All interests in 4 square metres of public highway (Bridge Close) and verges, Romford *(EGL84883 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
530	All interests in 716 square metres of commercial premises (13, Bridge Close), Romford *(EX61594 - Absolute Freehold)*	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD	-	-	-
535	All interests in 282 square metres of public footway and hardstanding; west of Atlanta Boulevard and north of Bridge Close, Romford *(EGL498441 - Absolute Freehold)*	The Riverside Group Limited 2 Estuary Boulevard Speke Liverpool L24 8RF	-	-	The Riverside Group Limited 2 Estuary Boulevard Speke Liverpool L24 8RF
540	All interests in 231 square metres of hardstanding and car park for commercial premises (12A Bridge Close, 12B Bridge Close and 12C Brisge Close), Romford	Bridge Close Regeneration LLP Town Hall Main Road	Bridge Close Regeneration LLP Town Hall Main Road Romford	-	Bridge Close Regeneration LLP Town Hall Main Road

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
Page 660	*(EGL451223 - Absolute Freehold)* *(BGL77939 - Absolute Leasehold)* *(EGL140298 - Absolute Leasehold)*	Romford RM1 3BD	RM1 3BD A.C.Preou Limited (trading as A C Preou) 8 Radford Cresent Billericay CM12 0DU Scylla Select Ltd S B C House Restmor Way Wallington SM6 7AH		Romford RM1 3BD A.C.Preou Limited (trading as A C Preou) 8 Radford Cresent Billericay CM12 0DU Scylla Select Ltd S B C House Restmor Way Wallington SM6 7AH
545	All interests in 131 square metres of river (River Rom) and bed thereof, trees and shrubbery; south of subway, and west of Waterloo Road, Romford *(EGL176865 - Absolute Freehold)*	Trolara Trading Limited Apollon Court Floor 3 Flat/Office 302 Arch. Makariou III 232 3030 Limassol - Cyprus	-	-	Trolara Trading Limited Apollon Court Floor 3 Flat/Office 302 Arch. Makariou III 232 3030 Limassol - Cyprus

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
550	All interests in 37 square metres of public highway (Bridge Close) and verges, Romford *(EGL73487 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
555	All interests in 421 square metres of commercial premises (1, Bridge Close), Romford *(EX48993 - Absolute Freehold)*	[redacted]	-	-	[redacted]
560	All interests in 145 square metres of residential property (36, Old Church Road), Romford *(P30960 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
565	All interests in 226 square metres of hardstanding and commercial car park (Lidl), Romford *(EGL176866 - Absolute Freehold)*	Lidl Great Britain Limited Lidl House 14 Kingston Road Surbiton	-	-	Lidl Great Britain Limited Lidl House 14 Kingston Road Surbiton

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
		KT5 9NU			KT5 9NU
570	All interests in 206 square metres of residential property (34, Old Church Road), Romford *(NGL167380 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
575	All interests in 41 square metres of public footway and hardstanding, north of Old Church Road, and south of Bridge Close, Romford *(P24427 - Absolute Freehold)*	[redacted]	-	-	[redacted]
585	All interests in 356 square metres of commercial premises (1, Bridge Close), Romford *(EX70083 - Absolute Freehold)*	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD	Action Industrial Cleaning Services (UK) Limited Coopers House 65a Wingletye Lane Hornchurch RM11 3AT (Co. Reg. 03875115)	-	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
					Action Industrial Cleaning Services (UK) Limited Coopers House 65a Wingletye Lane Hornchurch RM11 3AT (Co. Reg. 03875115)
590	All interests in 4 square metres of public footway and hardstanding, north of Old Church Road, and south of Bridge Close, Romford *(EGL73487 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
610	All interests in 235 square metres of public footway, bus stop, and hardstanding; north of Old Church Road, and south of Bridge Close, Romford *(P20097 - Absolute Freehold)*	[redacted]	-	-	[redacted]

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
615	All interests in 202 square metres of residential property (32, Old Church Road), Romford *(P29645 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
620	All interests in 1366 square metres of commercial premises (13A, Bridge Close), Romford *(EGL179619 - Absolute Freehold)*	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD	-	-	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD
635	All interests in 28 square metres of public highway (Bridge Close) and verges, Romford *(NGL198412 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
640	All interests in 143 square metres of residential property (30, Old Church Road), Romford	[redacted]	-	-	[redacted]

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
	(EGL264057 - Absolute Freehold)	[redacted]			[redacted]
650	All interests in 31 square metres of public highway (Bridge Close) and verges, Romford *(EGL83557 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
655	All interests in 157 square metres of residential property (28, Old Church Road), Romford *(EGL77608 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
660	All interests in 35 square metres of public highway (Bridge Close) and verges, Romford *(EGL88335 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
665	All interests in 179 square metres of residential property (26, Old Church Road), Romford *(EGL26341 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
675	All interests in 1 square metres of hardstanding and accessway; west of Regarth Avenue and south of subway, Romford *(Unregistered Land)*	Unregistered/Unknown	-	-	Unknown
680	All interests in 15 square metres of public highway (Bridge Close), footway and verges, Romford	London Borough Of Havering Town Hall	-	-	London Borough Of Havering Town Hall

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
	(EGL51617 - Absolute Freehold)	Main Road Romford RM1 3BD			Main Road Romford RM1 3BD
685	All interests in 31 square metres of public highway (Bridge Close) and verges, Romford *(EX71139 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
690	All interests in 120 square metres of residential property (24, Old Church Road), Romford *(EGL505511 - Absolute Freehold)*	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD	-	[redacted]	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD [redacted]

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
					[redacted]
695	All interests in 150 square metres of public highway (Atlantica Boulevard), footway, and PodPoint Charging Station, Romford *(Unregistered Land)*	Unregistered/Unknown	-	-	Unknown
700	All interests in 556 square metres of commercial premises (14, Bridge Close), Romford *(NGL123865 - Absolute Freehold)*	Budbridge Property Investments Limited Bridge House Budbridge Lane Merstone Newport Isle Of Wight PO30 3DH	-	Griffin Elevators Limited 14 Bridge Close Romford RM7 0AU	Budbridge Property Investments Limited Bridge House Budbridge Lane Merstone Newport Isle Of Wight PO30 3DH Griffin Elevators Limited 14 Bridge Close Romford RM7 0AU

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London Borough of Havering (Bridge Close - Residential) Compulsory Purchase Order 202X

Number on Map	Extent, Description and Situation of the Land	Qualifying persons under section 12(2)(a) of the Acquisition of Land Act 1981 – Name and Address			
		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
705	All interests in 10 square metres of public footway and hardstanding; west of Wells Court and east of Bridge Close, Romford *(Unregistered Land)*	Unregistered/Unknown	-	-	Unknown
710	All interests in 93 square metres of residential property (22, Old Church Road), Romford *(EGL564512 - Absolute Freehold)*	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD	-	[redacted]	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD [redacted]

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London Borough of Havering (Bridge Close - Residential) Compulsory Purchase Order 202X

Number on Map	Extent, Description and Situation of the Land	Qualifying persons under section 12(2)(a) of the Acquisition of Land Act 1981 – Name and Address			
		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
720	All interests in 51 square metres of commercial premises (14, Bridge Close), Romford *(NGL126397 - Absolute Freehold)*	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD	-	-	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD
725	All interests in 90 square metres of residential property (20, Old Church Road), Romford *(BGL90429 - Absolute Freehold)*	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD	-	[redacted]	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD [redacted]
730	All interests in 3009 square metres of Romford Ambulance Station; north of Old Church Road and south of Regarth Avenue, Romford *(EGL378230 - Absolute Freehold)*	London Ambulance Service National Health Service Trust Ambulance Headquarters 220 Waterloo Road London SE1 8SD	-	-	London Ambulance Service National Health Service Trust Ambulance Headquarters 220 Waterloo Road London SE1 8SD

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London Borough of Havering (Bridge Close - Residential) Compulsory Purchase Order 202X

Number on Map	Extent, Description and Situation of the Land	Qualifying persons under section 12(2)(a) of the Acquisition of Land Act 1981 – Name and Address			
		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
740	All interests in 203 square metres of river (River Rom) and bed thereof; south of subway, west of Waterloo Road, Romford Romford *(Unregistered Land)*	Unregistered/Unknown	-	-	Unknown
745	All interests in 35 square metres of public footway; north of Old Church Road and south of Wells Court, Romford *(Unregistered Land)*	Unregistered/Unknown	-	-	Unknown
750	All interests in 209 square metres of river (River Rom) and bed thereof, trees and shrubbery; south of subway, west of Waterloo Road, Romford *(BGL88825 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
755	All interests in 100 square metres of public footway; north of Old Church Road and south of Wells Court, Romford *(EGL291144 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford	-	-	London Borough Of Havering Town Hall Main Road Romford

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Number on Map	Extent, Description and Situation of the Land	Qualifying persons under section 12(2)(a) of the Acquisition of Land Act 1981 – Name and Address			
		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
		RM1 3BD			RM1 3BD
760	All interests in 103 square metres of public footway; south of subway, and west of Waterloo Road, Romford *(EGL22893 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
765	All interests in 52 square metres of public footway; south of subway, and west of Waterloo Road, Romford *(BGL156247 - Absolute Freehold)* *(EGL507435 - Absolute Freehold)* *(EGL508396 - Absolute Leasehold)*	Barking, Havering And Redbridge Hospitals National Health Service Trust Queens Hospital Rom Valley Way Romford RM7 0AG London Borough Of Havering Town Hall Main Road Romford RM1 3BD	Swan Housing Association Limited Chamber Court Castle Street Worcester WR1 3ZQ	-	Barking, Havering And Redbridge Hospitals National Health Service Trust Queens Hospital Rom Valley Way Romford RM7 0AG London Borough Of Havering Town Hall Main Road Romford RM1 3BD

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Number on Map	Extent, Description and Situation of the Land	Qualifying persons under section 12(2)(a) of the Acquisition of Land Act 1981 – Name and Address			
		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
770	All interests in 69 square metres of hardstanding, shrubbery, and public footway, north of Union Road and west of Bridge Close, Romford *(EGL319779 - Absolute Freehold)* *(EGL508396 - Absolute Leasehold)*	Barking, Havering And Redbridge Hospitals National Health Service Trust Queens Hospital Rom Valley Way Romford RM7 0AG	Swan Housing Association Limited Chamber Court Castle Street Worcester WR1 3ZQ	-	Barking, Havering And Redbridge Hospitals National Health Service Trust Queens Hospital Rom Valley Way Romford RM7 0AG
775	All interests in 20 square metres of hardstanding, shrubbery, and public footway, north of Union Road and west of Bridge Close, Romford *(BGL156247 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD
780	All interests in 18 square metres of hardstanding, shrubbery, and public footway, north of Union Road and west of Bridge Close, Romford *(BGL156247 - Absolute Freehold)*	London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough Of Havering Town Hall Main Road Romford RM1 3BD

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London Borough of Havering (Bridge Close - Residential) Compulsory Purchase Order 202X

Number on Map	Extent, Description and Situation of the Land	Qualifying persons under section 12(2)(a) of the Acquisition of Land Act 1981 – Name and Address			
		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
785	All interests in 4 square metres of hardstanding, shrubbery, and public footway, north of Union Road and west of Bridge Close, Romford *(BGL156247 - Absolute Freehold)* *(EGL507435 - Absolute Freehold)* *(EGL508396 - Absolute Leasehold)*	Barking, Havering And Redbridge Hospitals National Health Service Trust Queens Hospital Rom Valley Way Romford RM7 0AG London Borough Of Havering Town Hall Main Road Romford RM1 3BD	Swan Housing Association Limited Chamber Court Castle Street Worcester WR1 3ZQ	-	Swan Housing Association Limited Chamber Court Castle Street Worcester WR1 3ZQ
790	All interests in 3 square metres of public footway; south of subway, west of Waterloo Road, Romford *(BGL156247 - Absolute Freehold)* *(EGL507435 - Absolute Freehold)*	Barking, Havering And Redbridge Hospitals National Health Service Trust Queens Hospital Rom Valley Way Romford RM7 0AG London Borough Of Havering Town Hall	-	-	Barking, Havering And Redbridge Hospitals National Health Service Trust Queens Hospital Rom Valley Way Romford RM7 0AG London Borough Of Havering Town Hall

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London Borough of Havering (Bridge Close - Residential) Compulsory Purchase Order 202X

Number on Map	Extent, Description and Situation of the Land	Qualifying persons under section 12(2)(a) of the Acquisition of Land Act 1981 – Name and Address			
		Owners or Reputed Owners	**Lessees or Reputed Lessees**	**Tenants or Reputed Tenants**	**Occupiers**
		Main Road Romford RM1 3BD			Main Road Romford RM1 3BD
795	All interests in 22 square metres of hardstanding, shrubbery, and public footway, north of Union Road and west of Bridge Close, Romford *(BGL156247 - Absolute Freehold)* *(EGL507435 - Absolute Freehold)*	Barking, Havering And Redbridge Hospitals National Health Service Trust Queens Hospital Rom Valley Way Romford RM7 0AG London Borough Of Havering Town Hall Main Road Romford RM1 3BD	-	-	Barking, Havering And Redbridge Hospitals National Health Service Trust Queens Hospital Rom Valley Way Romford RM7 0AG London Borough Of Havering Town Hall Main Road Romford RM1 3BD
800	All interests in 6 square metres of public footway; south of subway, west of Waterloo Road, Romford *(EGL507435 - Absolute Freehold)* *(EGL508396 - Absolute Leasehold)*	Barking, Havering And Redbridge Hospitals National Health Service Trust Queens Hospital Rom Valley Way Romford	Swan Housing Association Limited Chamber Court Castle Street Worcester	-	Swan Housing Association Limited Chamber Court Castle Street Worcester

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London Borough of Havering (Bridge Close - Residential) Compulsory Purchase Order 202X

Number on Map	Extent, Description and Situation of the Land	Qualifying persons under section 12(2)(a) of the Acquisition of Land Act 1981 – Name and Address			
		Owners or Reputed Owners	**Lessees or Reputed Lessees**	**Tenants or Reputed Tenants**	**Occupiers**
		RM7 0AG	WR1 3ZQ		WR1 3ZQ
805	Permanent acquisition of new rights over 52 square metres of commercial car park (Lidl) and hardstanding, Romford *(EGL176866 - Absolute Freehold)*	Lidl Great Britain Limited Lidl House 14 Kingston Road Surbiton KT5 9NU	-	-	Lidl Great Britain Limited Lidl House 14 Kingston Road Surbiton KT5 9NU
810	All interests in 1928 square metres of residential properties, (222-226 South Street), Romford *(EGL141855 - Absolute Freehold)*	Meroon Trading UK Limited 11-17 Fowler Road Hainault Business Park Ilford IG6 3UJ	-	-	Meroon Trading UK Limited 11-17 Fowler Road Hainault Business Park Ilford IG6 3UJ
815	All interests in 638 square metres of residential properties, (222-226 South Street), Romford *(EGL141855 - Absolute Freehold)* *(EGL565244 - Absolute Leasehold)*	Meroon Trading UK Limited 11-17 Fowler Road Hainault Business Park Ilford IG6 3UJ	B-Hive Block Management Partners Limited 9-11 The Quadrant Richmond TW9 1BP	-	B-Hive Block Management Partners Limited 9-11 The Quadrant Richmond TW9 1BP

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London Borough of Havering (Bridge Close - Residential) Compulsory Purchase Order 202X

Number on Map	Extent, Description and Situation of the Land	Qualifying persons under section 12(2)(a) of the Acquisition of Land Act 1981 – Name and Address			
		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
820	All interests in 620 square metres of residential properties, (230-240 South Street), Romford *(EGL141974 - Absolute Freehold)*	Meroon Trading UK Limited 11-17 Fowler Road Hainault Business Park Ilford IG6 3UJ	-	-	Meroon Trading UK Limited 11-17 Fowler Road Hainault Business Park Ilford IG6 3UJ
825	All interests in 3 square metres of hardstanding, footway, and shruberry; west of Regarth Avenue and east of Bridge Close, Romford *(EX61594 - Absolute Freehold)*	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD	-	-	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD
830	All interests in 106 square metres of public footbridge and accessway; west of Regarth Avenue and east of Bridge Close, Romford *(Unregistered Land)*	Unregistered/Unknown	-	-	Unknown
835	Permanent acquisition of new rights over 52 square metres of accessway, footway, and shruberry; west of Regarth Avenue and east of Bridge Close, Romford	Freehold Managers (Nominees) Limited 250 Bishopsgate London	-	-	Freehold Managers (Nominees) Limited 250 Bishopsgate London

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Number on Map	Extent, Description and Situation of the Land	Qualifying persons under section 12(2)(a) of the Acquisition of Land Act 1981 – Name and Address			
		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
	(EGL452950 - Absolute Freehold)	EC2M 4AA			EC2M 4AA
840	Permanent acquisition of new rights over 3 square metres of accessway, footway, and shruberry; west of Regarth Avenue and east of Bridge Close, Romford *(EX61594 - Absolute Freehold)*	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD	-	-	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD
845	Permanent acquisition of new rights over 2 square metres of accessway, footway, and shruberry; west of Regarth Avenue and east of Bridge Close, Romford *(Unregistered Land - Absolute Freehold)*	Unregistered/Unknown	-	-	Unknown
850	Number not used.	-	-	-	-
855	Number not used.	-	-	-	-
860	Number not used.	-	-	-	-

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London Borough of Havering (Bridge Close - Residential) Compulsory Purchase Order 202X

Number on Map	Extent, Description and Situation of the Land	Qualifying persons under section 12(2)(a) of the Acquisition of Land Act 1981 – Name and Address			
		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
865	All interests in 113 square metres of river (River Rom) and bed thereof, trees and shrubbery; north of Old Church Bridge, and west of Bridge Close, Romford. *(EGL176865 - Absolute Freehold)*	Trolara Trading Limited Apollon Court Floor 3 Flat/Office 302 Arch. Makariou III 232 3030 Limassol Cyprus *(Co Reg - C50354)* (Dissolved)	-	-	Trolara Trading Limited Apollon Court Floor 3 Flat/Office 302 Arch. Makariou III 232 3030 Limassol Cyprus *(Co Reg - C50354)* (Dissolved)
870	All interests in 78 square metres of river (River Rom) and bed thereof, trees and shrubbery; north of Old Church Bridge, and west of Bridge Close, Romford. *(Unregistered Land - Absolute Freehold)*	Unregistered/Unknown	-	-	Unknown
875	All interests in 28 square metres of river (River Rom) and bed thereof, trees and shrubbery; north of Old Church Bridge, and west of Bridge Close, Romford. *(EGL451223- Absolute Freehold)* *(EGL140298- Absolute Leasehold)*	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD	-	-	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD

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London Borough of Havering (Bridge Close - Residential) Compulsory Purchase Order 202X

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		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
880	All interests in 171 square metres of river (River Rom) and bed thereof, trees and shrubbery; north of Old Church Bridge, and west of Bridge Close, Romford. *(EGL139160- Absolute Freehold)*	London Borough of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough of Havering Town Hall Main Road Romford RM1 3BD
885	All interests in r 46 square metres of river (River Rom) and bed thereof, trees and shrubbery; north of Old Church Bridge, and west of Bridge Close, Romford. *(EX61594- Absolute Freehold)*	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD	-	-	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD
890	All interests in 11 square metres of river (River Rom) and bed thereof, trees and shrubbery; north of Old Church Bridge, and west of Bridge Close, Romford. *(Unregistered Land - Absolute Freehold)*	Unregistered/Unknown	-	-	Unknown
895	All interests in 921 square metres of river (River Rom) and bed thereof, trees and	Unregistered/Unknown	-	-	Unknown

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London Borough of Havering (Bridge Close - Residential) Compulsory Purchase Order 202X

Number on Map	Extent, Description and Situation of the Land	Qualifying persons under section 12(2)(a) of the Acquisition of Land Act 1981 – Name and Address			
		Owners or Reputed Owners	Lessees or Reputed Lessees	Tenants or Reputed Tenants	Occupiers
	shrubbery; north of Old Church Bridge, and west of Bridge Close, Romford. *(Unregistered Land - Absolute Freehold)*				
900	All interests in 1 square metre of river (River Rom) and bed thereof, trees and shrubbery; north of Old Church Bridge, and west of Bridge Close, Romford. *(EX61594- Absolute Freehold)*	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD	-	-	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD
905	All interests in 16 square metres of river (River Rom) and bed thereof, trees and shrubbery; north of Old Church Bridge, and west of Bridge Close, Romford. *(EGL179619- Absolute Freehold)*	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD	-	-	Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD
910	All interests in 140 square metres of river (River Rom) and bed thereof, trees and shrubbery; north of Old Church Bridge, and west of Bridge Close, Romford. *(EGL21509- Absolute Freehold)*	London Borough of Havering Town Hall Main Road Romford RM1 3BD	-	-	London Borough of Havering Town Hall Main Road Romford RM1 3BD

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Table 2

Number on Map	Other Qualifying Persons under Section 12(2A)(a) of the Acquisition of Land Act 1981		Other Qualifying Persons under Section 12(2A)(b) of the Acquisition of Land Act 1981 – Not otherwise shown in Tables 1 and 2	
	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
15	Barking, Havering and Redbridge Hospitals National Health Service Trust Queen's Hospital Rom Valley Way Romford RM7 0AG **(EGL520145)**	Restriction on the disposition of the registered estate	George Wimpey East London Limited Gate House Turnpike Road High Wycombe HP12 3NR (Co. Reg. 04128538) **(EGL520145)**	Right of access for any purpose to the first and second access road and the maintenance thereof as contained in transfer dated 15 March 2007
			Barking, Havering and Redbridge Hospitals National Health Service Trust Queen's Hospital Rom Valley Way Romford RM7 0AG **(EGL520145)**	Rights of service media, support and entry for the maintenance thereof and rights of access and restrictive covenant relating to the maintenance of access road as contained in transfer dated 15 March 2017 and Lease dated 6 July 2006
			[redacted] **(EGL520145)**	Unilateral notice in respect of an agreement dated 9 September 2011
			[redacted] **(EGL520145)**	Unilateral notice in respect of an agreement dated 8 September 2014

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	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
Page 684			[redacted] **(EGL520145)**	Unilateral notice in respect of an agreement dated 16 April 2015
			[redacted] **(EGL520145)**	Unilateral notice in respect of an agreement dated 20 April 2015
			[redacted] **(EGL520145)**	Unilateral notice in respect of an agreement dated 20 April 2015
			[redacted] **(EGL520145)**	Unilateral notice in respect of an agreement dated 21 April 2015
			London Borough of Havering Town Hall Main Road Romford RM1 3BD **(EGL520145)**	Right of access and to maintain the Air Monitoring Unit and a restrictive covenant relating to maintaining the aforementioned right as contained in transfer dated 31 May 2006

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	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
20	Dufax Limited 72 Fielding Road London W4 1DB (Co. Reg. 03359921) **(EGL345373)**	Restrictions on the disposition of the registered estate	Network Rail Limited 1 Eversholt Street London NW1 2DN (Co. Reg. 04402220) **(EGL345373)**	Restrictive covenant relating to the protection of the rail track and rights of support, service media and entry for maintenance thereof as contained in conveyance dated 1 April 1996
	Lloyds Bank PLC 25 Gresham Street London EC2V 7HN (Co. Reg. 00002065) **(EGL345373)**	As mortgagee to [redacted]	[redacted] **(EGL345373)**	Rights of way as stipulated on the register
	Barclays Security Trustee Limited 1 Churchill Place London E14 5HP (Co. Reg. 10825314) **(EGL457852)**	As mortgagee to [redacted]	[redacted] **(EGL345373)**	Rights of way as stipulated on the register
			[redacted] **(EGL345373)**	Rights of way as stipulated on the register
			[redacted] **(EGL457852)**	Right of way as contained within transfer dated 16 September 1960

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	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
30			Barking, Havering and Redbridge Hospitals National Health Service Trust Queen's Hospital Rom Valley Way Romford RM7 0AG **(EGL507435)**	Right of access and right to maintain air monitoring unit contained in transfer dated 31 May 2006 and conveyance dated 1 November 1973
40			Unknown **(EGL69351)**	Rights contained in transfer dated 26 March 1927
45			Budbridge Property Investments Limited Bridge House Budbridge Lane Merstone Newport PO30 3DH (Co. Reg. 10590351) **(NGL126397)** National Grid Gas PLC 1-2 Strand London WC2N 5EH (Co. Reg. 02006000) **(NGL126397)**	Rights of way, service media and maintenance thereof as contained in transfer dated 12 February 1970 Rights relating to National Grid statutory gas undertaking as contained in deed dated 13 May 2011

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	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
			FB BCR LLP 40 Queen Anne Street London W1G 9EL (Co. Reg. OC413480) **(NGL126397)** Unknown **(NGL126397)**	Unilateral notice in respect of an agreement for sale dated 22 December 2016 Right of way, rights of service media and maintenance thereof as contained in transfer dated 7 November 1956, conveyance dated 12 February 1970 and as stipulated on the register Rights of service media and maintenance thereof and right of way as contained in transfer dated 23 May 1958 and deed dated 5 May 1969
50			Barking, Havering and Redbridge Hospitals National Health Service Trust Queen's Hospital Rom Valley Way Romford RM7 0AG **(EGL22893)**	Right of access and right to maintain air monitoring unit contained in transfer dated 31 May 2006, 15 March 2007 and conveyance dated 1 November 1973
60			Unknown **(EX24703)**	Rights contained in transfer dated 26 March 1927

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	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
80			London Borough of Havering Town Hall Main Road Romford RM1 3BD **(EGL24292)** Unknown **(EGL24292)**	Restrictive covenant relating to the use of the property - use as a private dwelling house as contained in transfer dated 5 April 1982 Rights of service media and maintenance thereof as contained in transfer dated 5 April 1927 and 21 April 1927
85			Unknown **(EGL67954)**	Rights contained in transfer dated 26 March 1927
90	Onesavings Bank PLC Reliance House Sun Pier Medway Street Chatham ME4 4ET (Co. Reg. 7312896) **(EGL19634)**	As mortgagee to [redacted]	Unknown **(EGL19634)**	Rights as contained in transfer dated 26 March 1927
95	Barclays Bank UK PLC 1 Churchill Place London E14 5HP	Notice of deposit of land certificate		

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	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
	(Co. Reg. 9740322) **(P22109)**			
135			Unknown **(EGL69351)**	Rights contained in transfer dated 26 March 1927
170			London Borough of Havering Town Hall Main Road Romford RM1 3BD **(EX90125)**	Right of way as stipulated on the register
190			Unknown **(EGL67954)**	Rights contained in transfer dated 26 March 1927
215			Unknown **(BGL114001)**	Rights of access as contained in deed dated 25 November 1989 and 24 November 1989
220	Barclays Security Trustee Limited 1 Churchill Place London E14 5HP	As mortgagee to [redacted]	[redacted] **(EX55423)**	Rights of service media and maintenance thereof and right of way as contained in transfer dated 23 May 1958 and deed dated 5 May 1969

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	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
	(Co. Reg. 10825314) **(EX55423)**			
230	Hoist Portfolio Holding Limited Le Masurier House La Rue Le Masurier St Helier Jersey JE2 4YE **(P25511)**	Restriction on the disposition of the registered estate		
	Intrum UK Finance Limited The Omnibus Building Lesbourne Road Reigate RH2 7JP (Co. Reg. 04140507) **(P25511)**	Restriction on the disposition of the registered estate		
	The Co-Operative Bank P.L.C PO Box 101 1 Balloon Street Manchester M60 4EP (Co. Reg. 00990937) **(P25511)**	As mortgagee to [redacted]		
	Paragon Bank PLC 51 Homer Road Solihull B91 3QJ	As mortgagee to [redacted]		

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	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
	(Co. Reg. 05390593) **(P25511)**			
240	Dufax Limited 72 Fielding Road London W4 1DB (Co. Reg. 03359921) **(EGL345373)**	Restrictions on the disposition of the registered estate	Network Rail Limited 1 Eversholt Street London NW1 2DN (Co. Reg. 04402220) **(EGL345373)**	Restrictive covenant relating to the protection of the rail track and rights of support, service media and entry for maintenance thereof as contained in conveyance dated 1 April 1996
	Lloyds Bank PLC 25 Gresham Street London EC2V 7HN (Co. Reg. 00002065) **(EGL345373)**	As mortgagee to [redacted]	[redacted] **(EGL345373)**	Rights of way as stipulated on the register
			[redacted] **(EGL345373)**	Rights of way as stipulated on the register
			[redacted] **(EGL345373)**	Rights of way as stipulated on the register
			[redacted]	Right of way as contained within transfer dated 16 September 1960

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Table 2

Number on Map	Other Qualifying Persons under Section 12(2A)(a) of the Acquisition of Land Act 1981		Other Qualifying Persons under Section 12(2A)(b) of the Acquisition of Land Act 1981 – Not otherwise shown in Tables 1 and 2	
	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
			(EGL457852)	
275			Action Industrial Cleaning Services (UK) Limited Coopers House 65a Wingletye Lane Hornchurch RM11 3AT (Co. Reg. 03875115) **(EX64526)**	Rights of service media, support and right of way as contained in lease dated 2 May 2006
285	Dufax Limited 72 Fielding Road London W4 1DB (Co. Reg. 03359921) **(EGL345373)** Lloyds Bank PLC 25 Gresham Street London EC2V 7HN (Co. Reg. 00002065) **(EGL345373)** Barclays Security Trustee Limited 1 Churchill Place	Restrictions on the disposition of the registered estate As mortgagee to [redacted] As mortgagee to [redacted]	Network Rail Limited 1 Eversholt Street London NW1 2DN (Co. Reg. 04402220) **(EGL345373)** [redacted] **(EX55423)** [redacted] **(EGL345373)**	Restrictive covenant relating to the protection of the rail track and rights of support, service media and entry for maintenance thereof as contained in conveyance dated 1 April 1996 Rights of service media and maintenance thereof and right of way as contained in transfer dated 23 May 1958 and deed dated 5 May 1969 Rights of way as stipulated on the register

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Table 2

Number on Map	Other Qualifying Persons under Section 12(2A)(a) of the Acquisition of Land Act 1981		Other Qualifying Persons under Section 12(2A)(b) of the Acquisition of Land Act 1981 – Not otherwise shown in Tables 1 and 2	
	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
Page 693	London E14 5HP (Co. Reg. 10825314) **(EX55423)**		[redacted] **(EGL345373)**	Rights of way as stipulated on the register
			[redacted] **(EGL345373)**	Rights of way as stipulated on the register
			[redacted] **(EGL457852)**	Right of way as contained within transfer dated 16 September 1960
295			Budbridge Property Investments Limited Bridge House Budbridge Lane Merstone Newport PO30 3DH (Co. Reg. 10590351) **(NGL126397)**	Rights of way, service media and maintenance thereof as contained in transfer dated 12 February 1970
			National Grid Gas PLC 1-2 Strand London	Rights relating to National Grid statutory gas undertaking as contained in deed dated 13 May 2011

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Number on Map	Other Qualifying Persons under Section 12(2A)(a) of the Acquisition of Land Act 1981		Other Qualifying Persons under Section 12(2A)(b) of the Acquisition of Land Act 1981 – Not otherwise shown in Tables 1 and 2	
	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
			WC2N 5EH (Co. Reg. 02006000) **(NGL126397)**	
			FB BCR LLP 40 Queen Anne Street London W1G 9EL (Co. Reg. OC413480) **(NGL126397)**	Unilateral notice in respect of an agreement for sale dated 22 December 2016
			Unknown **(NGL126397)**	Right of way, rights of service media and maintenance thereof as contained in transfer dated 7 November 1956, conveyance dated 12 February 1970 and as stipulated on the register
320			Unknown **(EX50627)**	Right of way as contained in deed dated 24 November 1989
335	Barclays Bank UK PLC 1 Churchill Place London E14 5HP (Co. Reg. 9740322) **(P30175)**	As mortgagee to [redacted]		
350	National Westminister Bank PLC 250 Bishopgate	As mortgagee to [redacted]	Bridge Close Regeneration LLP 40 Queen Anne Street London	Right of way as contained in transfer dated 26 September 1957 and Deed dated 25 September 1957

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London Borough of Havering (Bridge Close - Residential) Compulsory Purchase Order 202X

Table 2

Number on Map	Other Qualifying Persons under Section 12(2A)(a) of the Acquisition of Land Act 1981		Other Qualifying Persons under Section 12(2A)(b) of the Acquisition of Land Act 1981 – Not otherwise shown in Tables 1 and 2	
	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
	London EC2M 4AA (Co. Reg. 929027) **(EX48000)**		W1G 9EL (Co. Reg. OC421255) **(EX48000)** Simply Logistics Limited 4 Bridge Close Romford RM7 0AU (Co. Reg. 07337462) **(EX48000)**	 Right of way as contained in transfer dated 26 September 1957 and Deed dated 25 September 1957
30			Eastern Power Networks PLC Newington House 237 Southwark Bridge Road London SE1 6NP (Co. Reg. 2366906) **(EX51051)** Budbridge Property Investments Limited Bridge House Budbridge Lane Merstone Newport PO30 3DH (Co. Reg. 10590351) **(NGL126397)** National Grid Gas PLC 1-2 Strand London	Rights relating to the maintenance of electricity lines and apparatus as stipulated on the register Rights of way, service media and maintenance thereof as contained in transfer dated 12 February 1970 Rights relating to National Grid statutory gas undertaking as contained in deed dated 13 May 2011

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	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
Page 696			WC2N 5EH (Co. Reg. 02006000) **(NGL126397)** FB BCR LLP 40 Queen Anne Street London W1G 9EL (Co. Reg. OC413480) **(NGL126397)** Unknown **(NGL126397)**	 Unilateral notice in respect of an agreement for sale dated 22 December 2016 Right of way, rights of service media and maintenance thereof as contained in transfer dated 7 November 1956, conveyance dated 12 February 1970 and as stipulated on the register
365	A.C.Preou Limited 12b Bridge Close Romford RM7 0AU (Co. Reg. 00804106) **(BGL113941)**	Restriction on the disposition of the registered estate	[redacted] **(EGL170603)** **(BGL113941)** A.C.Preou Limited 12b Bridge Close Romford RM7 0AU (Co. Reg. 00804106) **(BGL113941)**	Rights of service media, support and entry for the maintenance thereof as contained in transfer dated 8 November 1957 and conveyance dated 28 February 1957 Rights of service media, support and car park space to the front of property as contained in deed dated 20 February 1984 and lease dated 24 May 2015

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Number on Map	Other Qualifying Persons under Section 12(2A)(a) of the Acquisition of Land Act 1981		Other Qualifying Persons under Section 12(2A)(b) of the Acquisition of Land Act 1981 – Not otherwise shown in Tables 1 and 2	
	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
Page 697			British Gas Limited Millstream Maidenhead Road Windsor SL4 5GD (Co. Reg. 05266924) **(EGL170603)** FB BCR LLP 40 Queen Anne Street London W1G 9EL (Co. Reg. OC413480) **(EX53020)** **(EGL170603)** Unknown **(EGL170603)** **(BGL113941)**	Rights relating to laying and maintaining gas pipeline undertakings as contained in deed dated 19 May 1989 Unilateral notice in respect of an agreement for sale dated 22 December 2016 Rights of service media and maintenance thereof as contained in transfer dated 20 September 1957
. 385	National Westminister Bank PLC 250 Bishopgate London EC2M 4AA (Co. Reg. 929027) **(P30020)**	As mortgagee to [redacted]		
405	Barclays Bank UK PLC 1 Churchill Place London	As mortgagee to [redacted]	Bridge Close Regeneration LLP 40 Queen Anne Street London	Right of way as contained in transfer dated 26 September 1957 and Deed dated 25 September 1957 and rights of

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London Borough of Havering (Bridge Close - Residential) Compulsory Purchase Order 202X

Table 2

Number on Map	Other Qualifying Persons under Section 12(2A)(a) of the Acquisition of Land Act 1981		Other Qualifying Persons under Section 12(2A)(b) of the Acquisition of Land Act 1981 – Not otherwise shown in Tables 1 and 2	
	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
	E14 5HP (Co. Reg. 9740322) **(EGL411832)**		W1G 9EL (Co. Reg. OC421255) **(EX52545)**	service media/ support and maintenance thereof and right of way as contained in transfer dated 15 June 1957
	Barclays Security Trustee Limited 1 Churchill Place London E14 5HP (Co. Reg. 10825314) **(EGL411832)**	As mortgagee to [redacted]	[redacted] **(EGL411832)** **(EX52545)**	Right of way as contained in transfer dated 26 September 1957 and Deed dated 25 September 1957
	Barclays Bank UK PLC 1 Churchill Place London E14 5HP (Co. Reg. 9740322) **(EGL14280)**	As mortgagee to [redacted]	[redacted] **(EGL411832)** **(EX52545)**	Right of way as contained in transfer dated 26 September 1957 and Deed dated 25 September 1957
			Simply Logistics Limited 4 Bridge Close Romford RM7 0AU (Co. Reg. 07337462) **(EX52545)**	Right of way as contained in transfer dated 26 September 1957 and Deed dated 25 September 1957
			FB BCR LLP 40 Queen Anne Street London W1G 9EL (Co. Reg. OC413480) **(EX52545)**	Unilateral notice in respect of an agreement for sale dated 22 December 2016

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London Borough of Havering (Bridge Close - Residential) Compulsory Purchase Order 202X

Table 2

Number on Map	Other Qualifying Persons under Section 12(2A)(a) of the Acquisition of Land Act 1981		Other Qualifying Persons under Section 12(2A)(b) of the Acquisition of Land Act 1981 – Not otherwise shown in Tables 1 and 2	
	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
			Unknown **(EGL411832)** **(EX52545)**	Right of way and service media as stipulated on the register
420			[redacted] **(EGL14280)**	Right of way as contained in transfer dated 7 September 1927
440	Barclays Bank UK PLC 1 Churchill Place London E14 5HP (Co. Reg. 9740322) **(EGL175667)**	As mortgagee to [redacted]		
450	Bank of Scotland PLC The Mound Edinburgh EH1 1YZ (Co. Reg. SC327000) **(P38510)**	As mortgagee to [redacted]		
460	A.C.Preou Limited 12b Bridge Close Romford RM7 0AU (Co. Reg. 00804106)	Restriction on the disposition of the registered estate	[redacted]	Rights of service media, support and entry for the maintenance thereof as contained in transfer dated 8 November 1957 and conveyance dated 28 February 1957

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Number on Map	Other Qualifying Persons under Section 12(2A)(a) of the Acquisition of Land Act 1981		Other Qualifying Persons under Section 12(2A)(b) of the Acquisition of Land Act 1981 – Not otherwise shown in Tables 1 and 2	
	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
	(BGL113941)		**(EGL451223)** **(EGL140298)** **(BGL113941)** A.C.Preou Limited 12b Bridge Close Romford RM7 0AU (Co. Reg. 00804106) **(BGL113941)** Unknown **(EGL140298)**	 rights of service media, support and car park space to the front of property as contained in deed dated 20 February 1984 and lease dated 24 May 2015 Right of access and service media as contained in transfer dated 20 September 1957
475			[redacted] **(EGL451223)** **(EGL140298)** Unknown **(EGL140298)**	Rights of service media, support and entry for the maintenance thereof as contained in transfer dated 8 November 1957 and conveyance dated 28 February 1957 Right of access and service media as contained in transfer dated 20 September 1957
480			Bridge Close Regeneration LLP 40 Queen Anne Street London W1G 9EL	Right of way as contained in transfer dated 26 September 1957 and Deed dated 25 September 1957 and rights of service media/ support and maintenance

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Number on Map	Other Qualifying Persons under Section 12(2A)(a) of the Acquisition of Land Act 1981		Other Qualifying Persons under Section 12(2A)(b) of the Acquisition of Land Act 1981 – Not otherwise shown in Tables 1 and 2	
	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
			(Co. Reg. OC421255) **(EX51382)** Unknown **(EX51382)**	thereof and right of way as contained in transfer dated 15 June 1957 Rights of service media as stipulated on the register
485			[redacted] **(BGL77939)** **(EGL451223)** **(BGL77963)** **(EGL140298)** Unknown **(EGL140298)** **(BGL77963)**	Rights of service media, support and entry for the maintenance thereof as contained in transfer dated 8 November 1957 and conveyance dated 28 February 1957 Right of access and service media as contained in transfer dated 20 September 1957
495			Unknown **(EGL47912)**	Rights of drainage as stipulated on the register
510			Euro's Best Profiles Ltd 407 Ley Street Ilford Essex IG1 4AB (Co. Reg. 07006576) **(EX51020)**	Unilateral notice in respect a lease dated 13 October 2015

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	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
535			British Gas Limited Millstream Maidenhead Road Windsor SL4 5GD (Co. Reg. 05266924) **(EGL498441)**	Right to lay and maintain a steel gas main as contained in deed dated 10 April 1980
			The Secretary of State for Transport Great Minster House 33 Horseferry Road Westminster London SW1P 4DR **(EGL498441)**	Unilateral notice in respect of an option to call for the grant of a lease dated 14 September 2006
540			[redacted] **(BGL77963)** **(EGL451223)** **(BGL77939)** **(EGL140298)**	Rights of service media, support and entry for the maintenance thereof as contained in transfer dated 8 November 1957 and conveyance dated 28 February 1957
			Unknown **(EGL140298)** **(BGL77963)**	Right of access and service media as contained in transfer dated 20 September 1957

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London Borough of Havering (Bridge Close - Residential) Compulsory Purchase Order 202X

Table 2

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	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
545	National Westminister Bank PLC 250 Bishopgate London EC2M 4AA (Co. Reg. 929027) **(EGL176865)**	As mortgagee to [redacted]	British Gas Limited Millstream Maidenhead Road Windsor SL4 5GD (Co. Reg. 05266924) **(EGL176865)**	Right to lay and maintain a steel gas main as contained in deed dated 10 April 1980
55[redacted]			Unknown **(EX48993)**	Right of way as stipulated on the register
58[redacted]			British Gas Limited Millstream Maidenhead Road Windsor SL4 5GD (Co. Reg. 05266924) **(EGL176866)**	Right to lay and maintain a steel gas main as contained in deed dated 10 April 1980
585			Action Industrial Cleaning Services (UK) Limited Coopers House 65a Wingletye Lane Hornchurch RM11 3AT (Co. Reg. 03875115) **(EX70083)**	Rights of service media, support and right of way as contained in lease dated 2 May 2006

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London Borough of Havering (Bridge Close - Residential) Compulsory Purchase Order 202X

Table 2

Number on Map	Other Qualifying Persons under Section 12(2A)(a) of the Acquisition of Land Act 1981		Other Qualifying Persons under Section 12(2A)(b) of the Acquisition of Land Act 1981 – Not otherwise shown in Tables 1 and 2	
	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
610	Barclays Bank UK PLC 1 Churchill Place London E14 5HP (Co. Reg. 9740322) **(P20097)**	Until the registration of a disposition in favour of a purchaser for money or money's worth the land is liable to such death duties as may be payable or arise by [redacted]		
620			Budbridge Property Investments Limited Bridge House Budbridge Lane Merstone Newport PO30 3DH (Co. Reg. 10590351) **(EGL179619)**	Right of way as contained in transfer dated 16 November 1970
			Bridge Close Regeneration LLP 40 Queen Anne Street London W1G 9EL (Co. Reg. OC421255) **(EGL179619)**	Unilateral notice in respect of a contract for sale dated 12 April 2019
			Unknown **(EGL179619)**	Right relation to building permission and alteration as contained in conveyance dated 31 December 1932

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Number on Map	Other Qualifying Persons under Section 12(2A)(a) of the Acquisition of Land Act 1981		Other Qualifying Persons under Section 12(2A)(b) of the Acquisition of Land Act 1981 – Not otherwise shown in Tables 1 and 2	
	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
650			Unknown **(EGL83557)**	Rights contained in transfer dated 8 December 1927
655			Unknown **(EGL77608)**	Rights contained in transfer dated 8 December 1927
680			[redacted] **(EGL51617)**	Rights of service media, entry for maintenance thereof and rights of support, light and air as contained in transfer 27 December 1960
			[redacted] **(EGL51617)**	Rights of service media, entry for maintenance thereof and rights of support, light and air as contained in transfer 27 December 1960
690			FB BCR LLP 40 Queen Anne Street London W1G 9EL (Co. Reg. OC413480) **(EGL505511)**	Unilateral notice in respect of an agreement for sale dated 22 December 2016

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	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
700			London Borough of Havering Town Hall Main Road Romford RM1 3BD **(NGL123865)** Budbridge Property Investments Limited Bridge House Budbridge Lane Merstone Newport PO30 3DH (Co. Reg. 10590351) **(NGL123865)**	Restrictive covenant relating to land use - use of land as an ambulance station or other statutory function of the council as contained in conveyance dated 19 May 1959 and rights of service media, entry and maintenance thereof as contained in conveyance dated 24 January 1964 and 12 February 1970 Rights of way, service media and maintenance thereof as contained in conveyance dated 31 March 1965 and 12 February 1970
710			Budbridge Property Investments Limited Bridge House Budbridge Lane Merstone Newport PO30 3DH (Co. Reg. 10590351) **(EGL564512)** FB BCR LLP 40 Queen Anne Street	Right of way and rights of service media and maintenance thereof as contained in conveyance dated 31 March 1965 and transfer dated 12 February 1970 Unilateral notice in respect of an agreement for sale dated 22 December

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Number on Map	Other Qualifying Persons under Section 12(2A)(a) of the Acquisition of Land Act 1981		Other Qualifying Persons under Section 12(2A)(b) of the Acquisition of Land Act 1981 – Not otherwise shown in Tables 1 and 2	
	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
			London W1G 9EL (Co. Reg. OC413480) **(EGL564512)**	2016
			Unknown **(EGL564512)**	Rights of service media as contained in transfer dated 7 November 1956
720			Budbridge Property Investments Limited Bridge House Budbridge Lane Merstone Newport PO30 3DH (Co. Reg. 10590351) **(NGL126397)**	Rights of way, service media and maintenance thereof as contained in transfer dated 12 February 1970
			National Grid Gas PLC 1-2 Strand London WC2N 5EH (Co. Reg. 02006000) **(NGL126397)**	Rights relating to National Grid statutory gas undertaking as contained in deed dated 13 May 2011
			FB BCR LLP 40 Queen Anne Street London W1G 9EL (Co. Reg. OC413480) **(NGL126397)**	Unilateral notice in respect of an agreement for sale dated 22 December 2016

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	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
			Unknown **(NGL126397)**	Right of way, rights of service media and maintenance thereof as contained in transfer dated 7 November 1956, conveyance dated 12 February 1970 and as stipulated on the register
725	Onesavings Bank PLC Reliance House Sun Pier Medway Street Chatham ME4 4ET (Co. Reg. 7312896) **(BGL90429)**	Rights of way, service media and maintenance thereof as contained in conveyance dated 31 March 1965 and 12 February 1970	Budbridge Property Investments Limited Bridge House Budbridge Lane Merstone Newport PO30 3DH (Co. Reg. 10590351) **(BGL90429)** FB BCR LLP 40 Queen Anne Street London W1G 9EL (Co. Reg. OC413480) **(BGL90429)** Unknown **(BGL90429)**	Rights of way, service media and maintenance thereof as contained in conveyance dated 31 March 1965 and 12 February 1970 Unilateral notice in respect of an agreement for sale dated 22 December 2016 Rights of service media as contained in transfer dated 7 November 1956 and rights of way, service media and maintenance thereof as stipulated on the register
730			London Ambulance Service National Health Service Trust	Rights of service media and maintenance thereof as contained in

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	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
Page 709			Ambulance Headquarters 220 Waterloo Road London SE1 8SD **(EGL378230)** London Borough of Havering Town Hall Main Road Romford RM1 3BD **(EGL378230)** Unknown **(EGL378230)**	transfer dated 15 June 1960 Restrictive covenant relating to land use - use of land as an ambulance station or other statutory function of the council as contained in conveyance dated 19 May 1959 Restrictive covenants as may have been imposed thereon before 25 September 1998 and are still subsisting and capable of being enforced and rights of service media and maintenance thereof as stipulated by the register
760			Barking, Havering and Redbridge Hospitals National Health Service Trust Queen's Hospital Rom Valley Way Romford RM7 0AG **(EGL22893)**	Right of access and right to maintain air monitoring unit contained in transfer dated 31 May 2006, 15 March 2007 and conveyance dated 1 November 1973
765			Barking, Havering and Redbridge Hospitals National Health Service	Right of access and right to maintain air monitoring unit contained in transfer

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	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
			Trust Queen's Hospital Rom Valley Way Romford RM7 0AG **(EGL507435)**	dated 31 May 2006 and conveyance dated 1 November 1973
785*			Barking, Havering and Redbridge Hospitals National Health Service Trust Queen's Hospital Rom Valley Way Romford RM7 0AG **(EGL507435)**	Right of access and right to maintain air monitoring unit contained in transfer dated 31 May 2006 and conveyance dated 1 November 1973
790			Barking, Havering and Redbridge Hospitals National Health Service Trust Queen's Hospital Rom Valley Way Romford RM7 0AG **(EGL507435)**	Right of access and right to maintain air monitoring unit contained in transfer dated 31 May 2006 and conveyance dated 1 November 1973
795			Barking, Havering and Redbridge Hospitals National Health Service Trust Queen's Hospital Rom Valley Way	Right of access and right to maintain air monitoring unit contained in transfer dated 31 May 2006 and conveyance dated 1 November 1973

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	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
			Romford RM7 0AG **(EGL507435)**	
800			Barking, Havering and Redbridge Hospitals National Health Service Trust Queen's Hospital Rom Valley Way Romford RM7 0AG **(EGL507435)**	Right of access and right to maintain air monitoring unit contained in transfer dated 31 May 2006 and conveyance dated 1 November 1973
805			British Gas Limited Millstream Maidenhead Road Windsor SL4 5GD (Co. Reg. 05266924) **(EGL176866)**	Right to lay and maintain a steel gas main as contained in deed dated 10 April 1980
825			Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD **(EX61594)**	Right of way as contained in transfer dated 8 August 1959

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	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
840			Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD **(EX61594)**	Right of way as contained in transfer dated 8 August 1959
87[redacted]			[redacted] **(EGL451223)** **(EGL140298)** Unknown **(EGL140298)**	Rights of service media, support and entry for the maintenance thereof as contained in transfer dated 8 November 1957 and conveyance dated 28 February 1957 Right of access and service media as contained in transfer dated 20 September 1957
880			Network Rail Limited 1 Eversholt Street London NW1 2DN (Co. Reg. 04402220) **(EGL139160)**	Rights relating to support and service media as contained in conveyance dated 31 December 1932
885			Bridge Close Regeneration LLP Town Hall Main Road	Right of way as contained in transfer dated 8 August 1959

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London Borough of Havering (Bridge Close - Residential) Compulsory Purchase Order 202X

Table 2

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	Name and Address	**Description of Interest to be Acquired**	**Name and Address**	**Description of the land for which the person in adjoining column is likely to make a claim**
			Romford RM1 3BD **(EX61594)**	
900			Bridge Close Regeneration LLP Town Hall Main Road Romford RM1 3BD **(EX61594)**	Right of way as contained in transfer dated 8 August 1959
905			Budbridge Property Investments Limited Bridge House Budbridge Lane Merstone Newport PO30 3DH (Co. Reg. 10590351) **(EGL179619)** Bridge Close Regeneration LLP 40 Queen Anne Street London W1G 9EL (Co. Reg. OC421255) **(EGL179619)** Unknown **(EGL179619)**	Right of way as contained in transfer dated 16 November 1970 Unilateral notice in respect of a contract for sale dated 12 April 2019 Right relation to building permission and alteration as contained in conveyance dated 31 December 1932

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London Borough of Havering (Bridge Close - Residential) Compulsory Purchase Order 202X

General Entries Register

Name and Address	Capacity	Qualification
BT Group plc 1 Braham Street London E1 8EE *(Org. Reg. 04190816)*	As statutory telecommunications undertaker	In respect of telecommunications facilities, joint chambers, telegraph poles and other apparatus
Essex and Suffolk Water Limited Northumbria House Abbey Road Pity Me Durham DH1 5FJ *(Org. Reg. 02635436)*	As statutory water undertaker	In respect of water pipes, infrastructure, and other apparatus
GTC Infrastructure Limited PO BOX 186 Royal Chamber St Julian Avenue St Peter Port Guernsey GY1 3HB *(Org. Reg. FC020169)*	As licensed gas undertaker	In respect of distribution gas pipes, infrastructure, and other apparatus
Openreach Limited Kelvin House 123 Judd Street London WC1H 9NP *(Org. Reg. 10690039)*	As licensed telecommunications operator	In respect of telecommunications facilities, joint chambers, telegraph poles and other apparatus
National Gas Transmission plc National Grid House	As statutory gas undertaker	In respect of low pressure and medium pressure gas pipes, infrastructure, and other apparatus

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* SEE NOTES PAGE APPENDED TO THIS DOCUMENT

London Borough of Havering (Bridge Close - Residential) Compulsory Purchase Order 202X

General Entries Register

Name and Address	Capacity	Qualification
Warwick Technology Park Gallows Hill Warwick CV34 6DA *(Org. Reg. 02006000)*		
Network Rail Infrastructure Limited Waterloo General Office London SE1 8SW *(Org. Reg. 02904587)*	As statutory railway authority	
Thames Water Limited Clearwater Court Vastern Road Reading RG1 8DB *(Co. Reg. 02366623)*	As statutory water undertaker	In respect of foul and surface sewer pipes, infrastructure, and other apparatus
UK Power Networks (Operations) Limited Newington House 237 Southwark Bridge Road London SE1 6NP *(Co. Reg. 03870728)*	As statutory electricity undertaker	In respect of electricity transmission lines, cables, and other apparatus
Virgin Media Limited 500 Brook Drive Reading RG2 6UU *(Co. Reg. 02591237)*	As licensed telecommunications operator	In respect of telecommunications facilities, joint chambers, telegraph poles and other apparatus

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NOTES:

TABLE 1:

This CPO schedule provides all up to date freeholder and leaseholder (registered proprietors only) information as shown in Table 1 based upon recent Land Registry data (September 2024). Any tenant / occupier details for the land are not given as these remain unknown until contact land referencing is commenced and the full process undertaken. This will involve issue of Requisition for Information forms (Section 16 Notices) to all registered title interests and subsequent chasing, processing of data and engagement with interested parties to confirm details. As such the accuracy of interests cannot be given until this process is undertaken – the timings of this process are to be discussed with the client and in any eventuality are recommended to be taken no sooner than before 6 months before Making of the CPO in order to avoid further landowner refresh and confirmation exercises to be necessary.

TABLE 2:

Please note that all Table 2 information is currently based off a previous land referencing exercise and is presumed. Therefore a full land referencing refresh will be necessary to confirm exact details of all interests in this table through a title interrogation exercise and completion of the contact land referencing / Requisition for Information forms (Section 16 Notices). Any Rights to Light assessments have not been reviewed and any necessary interests identified to be added to Table 2 in respect of their interest in land.

GENERAL ENTRIES:

The General Entries table is based upon recent utilities searches undertaken within and adjacent to the scheme boundary.

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THE LONDON BOROUGH OF HAVERING
(BRIDGE CLOSE ROMFORD)
COMPULSORY PURCHASE ORDER No.1 [2026]

SECTION 226 (1)(a) AND SECTION 226(3)(a) OF THE TOWN AND COUNTRY PLANNING ACT 1990

SECTION 13 OF THE LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS) ACT 1976

AND

THE ACQUISITION OF LAND ACT 1981

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STATEMENT OF REASONS OF THE LONDON BOROUGH OF HAVERING FOR THE MAKING OF THE COMPULSORY PURCHASE ORDER

December 2025

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1.0 Introduction

1.1 The London Borough of Havering ("the Council") has made The London Borough of Havering (Bridge Close) Compulsory Purchase Order No.1 2026 ("the Order") pursuant to the statutory powers contained in s226 (1)(a) and s226 (3)(a) of the Town and Country Planning Act 1990 as amended ("the 1990 Act") and associated provisions within section 13 of the Local Government (Miscellaneous Provisions) Act 1976 ("the 1976 Act").

1.2 This Statement of Reasons ("this Statement") is a non-statutory statement provided in compliance with paragraphs 25 and 196 of the Ministry of Housing, Communities and Local Government ("MHCLG") "Guidance on Compulsory purchase process and The Crichel Down Rules" originally published in October 2015 and last updated in January 2025 ("the CPO Guidance").

1.3 The Council's purpose in making the Order, and seeking, if necessary, its confirmation by the Secretary of State, is to enable the Council to acquire all property and other proprietary interests of the land, including (where appropriate) new rights, included in the Order ("the Order Land"), for the purposes of securing the regeneration of Bridge Close Regeneration area in Romford, as is more fully described in [section 5.0] of this Statement. The making of the Order is a means of last resort, noting the Council will continue to engage with all holders of interests in the Order Land, including the interests held by the London Ambulance Service comprised in the in the current planning application for the Scheme.

1.4 Planning permission for the development (“the Scheme”) is expected in the fourth quarter of 2025 with reference P1765.23, noting Strategic Planning Committee has resolved to grant planning permission on 28th August 2025. Following the grant of planning permission, which is expected in December 2025, it is anticipated that two applications will be prepared to vary the planning permission. The first application will be submitted under Section 96a of the Town and Country Planning Act (1990) for non-material amendments to alter the approved description of development on the planning permission. The second application will be submitted under Section 73 of the Town and Country Planning Act (1990) for Minor Material Amendments to the approved drawings and supporting information in order to retain the LAS in situ. These applications are expected to be granted by September 2026. The variations to the planning permission would result in a loss of residential units, loss of affordable residential units, loss of flexible health centre / commercial floorspace, loss of public open space and would require a redesign of phase 2 of the Scheme. This will be referred hereafter as “the Varied Scheme”.

1.5 The Bridge Close regeneration area lies within Romford Town Centre Housing Zone and so forms part of the wider Mayor of London's Housing Strategy, which introduced Housing Zones as a new way to deliver large numbers of new homes in areas of London with high development potential. The Greater London Authority ("the GLA") launched the Housing Zone Prospectus on 30th June 2014. The purpose of the Housing Zones programme is to increase housing supply by accelerating and/or unlocking development.

1.6 The Order is being submitted to the Secretary of State for confirmation pursuant to the Acquisition of Land Act 1981. If confirmed by the Secretary of State, the Order will enable the Council to acquire compulsorily the land and new rights included in the Order.

1.7 The map to the Order included at Appendix A ("Order Land") identifies the land proposed to be acquired (coloured [pink]) and the land on, over or under which new rights are to be created and acquired (coloured [blue]).

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1.8 Appendix B to the Order ("Order Schedule") lists owners, lessees, tenants and occupiers of the Order Land, so far as known. In addition, it lists other parties with a qualifying interest in the Order Land as defined by section 12(2) Acquisition of Land Act 1981.

1.9 Including unregistered land in the ownership of the Council as Highways Authority, the ownership of freehold and long leasehold interests by the Council is 70% by area.

1.10 Ardent Management Limited (“Ardent”), the Council's appointed property surveyors, commenced negotiations for the acquisition of third-party interests in the Order Land in 2016. To date the Council and its development partners have acquired [46 freehold interests and 1 long leasehold interest] out of a total 117 registered property interests] in the Order Land. By number of property interests (as opposed to area as cited as 70% above), 79% of the freehold and long leasehold interests in the Order Land are owned by the Council. This 79% comprises approximately 38% residential properties and approximately 16% commercial properties, the remaining 47% being made up of public or unregistered land that is in council ownership. Notwithstanding the extent of the Council's ownership of the Order Land and despite years of negotiations, the only way to ensure the timely delivery of the Scheme is via the Council's intervention and the use of its compulsory purchase powers.

1.11 The Scheme proposals have been developed with residents, businesses and the wider community through multiple rounds of consultation dating back to 2018, further details of which are set out in section [4.0] below.

1.12 A masterplan approach has been adopted for the Scheme. Through the design development process, and community engagement, a series of strategic principles for the masterplan have been articulated, tested and refined. These include the following:

- Creating a new Romford quarter;
- Creating a place to live, providing a range of residential types and tenures, along with workspaces and retail spaces;
- Revealing the historic landscape;
- Creating a neighbourhood where cycling and walking are promoted, improving connectivity and valuable open space and play areas for the wider community;
- Establishing an east-west connection including a critical pedestrian and cycling link towards the Town Centre and Romford station;
- Responding to existing and emerging context including the existing conditions of Waterloo Road and Oldchurch Road; and
- Underpinning proposals with an understanding of deliverability, including phasing strategies that include relocation of retained uses within the site.

1.13 The Council consider the Scheme and related planning permission, which is expected in the fourth quarter of 2025 (planning reference P1765.23) following a resolution to grant planning permission at London Borough of Havering’s Strategic Planning Committee on 28 August 2025, and the Order to fully accord with, and further the objectives of, the proposed Masterplan and Design Code. Further details of the Order Scheme are set out in Section [5.0] below.

1.14 The Scheme will deliver up to 1,070 residential dwellings, with 35% being affordable housing units comprising a mix of tenures, comprising 70% shared ownership and 30% social rent tenures, to support local housing needs and helping meet the Borough's (and London's) urgent housing need. The Scheme includes 5,956 sqm of commercial floor space including office and flexible workspace, retail use, professional services and leisure use. Community facilities, of up to 6,970 sqm will be provided including a three-form entry primary school and nursery, a flexible health centre / commercial unit and a community

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centre. Vital infrastructure will be delivered as part of the Scheme including a new pedestrian/cycle bridge across the River Rom. The Havering Islamic Cultural Centre (HICC) currently located at Bridge Close will be relocated to a new town centre site in order to ensure the services and benefits it provides to the local and wider East London Islamic community are preserved.

1.15 The Varied Scheme comprises up to 896 units in total of which 35% of the total number of habitable rooms will be affordable housing. This equates to a reduction of up to 174 residential units from the original Scheme.

1.16 The provision of residential development will assist in addressing the housing shortfall in the Borough and respond to housing needs, whilst the provision and relocation of a range of commercial and community uses will help deliver new employment and social infrastructure to meet the needs of the wider community and Romford town centre.

1.17 The Council is satisfied that there is a compelling case in the public interest for it using its powers of compulsory acquisition for this purpose. The Scheme fits within the planning framework for the area, accords with the Development Plan at all levels and advances the objectives of the Plan, meet and advances the policies of the NPPF and will make a significant contribution to the achievement of the promotion or improvement of the economic, social or environmental wellbeing of the area, and satisfies the other matters set out in paragraph 107 of the CPO Guidance.

2.0 Background and Scheme Evolution

2.1 The Scheme is based in Romford Town Centre, the administrative centre for the London Borough of Havering. The town centre has significant potential for economic growth with an easily accessible primary retail area and strong transport links. The site has an excellent Public Transport Accessibility Level (PTAL) of 6a. Romford Rail Station is located approximately 200 metres to the northeast of the site and provides Transport for London (TfL) Rail services to Brentwood and London Liverpool Street (with journey times of 17 minutes), London Overground services to Upminster and National Rail services to Southend Victoria. In addition, Romford Station is part of the Elizabeth Line. This transport infrastructure will enable thousands of additional homes and jobs, encourage new enterprise and attract greater investment.

2.2 Bridge Close is currently, in large part, a fragmented and poorly maintained and dated industrial estate mostly built in the 1950s and 1960s in multiple ownership, which developers for many years have unsuccessfully tried to assemble for development. The Order Land is currently occupied by mixed industrial, warehouse and ancillary units, an ambulance station, Islamic Cultural Centre and a number of terraced residential properties to the front of the site. 222-226 South Street, the site where it is proposed to relocate HICC, is situated to the southeast of Bridge Close and comprises a former builder's merchant premises and car park, last used as a restaurant, retail units and gymnasium. The owner of the site is considering its redevelopment in the short to medium term.

The Purpose of the Council Making the Order

2.3 The Council's vision for the Scheme builds on the site allocation of the core of the site in the Romford Area Action Plan 2008 and on proposals set out in the Romford Town Centre November 2015 Development Framework and wider local, regional and national planning policy, including the NPPF (2024), London Plan (2021) and Havering Local Plan (2021).

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2.4 The Council has been consistent in promoting and progressing its vision to transform Bridge Close, currently a declining, under occupied, light industrial estate with a degraded environment. It is a key regeneration site located on the edge of Romford town centre, and close to the railway station. The Council's ambitious regeneration objectives are for a residential led, mixed use development delivering up to 1,070 new homes (including genuinely affordable housing), key social infrastructure, including a new school, a health facility, and high quality public realm improvements. Pedestrian and cycle routes both within and connecting the new community to Romford Town Centre and public transport nodes at Romford Station will be provided, including a new bridge over the River Rom, which will be revitalised as a watercourse. The development will also deliver commercial and affordable employment space.

2.5 The Council's vision is predicated on lifting the quality and aspirations of the estate (and wider area) and thereby arresting the decline in the area. Demographic research suggests that while 86% of residents of Havering are economically active, higher than Greater London and England as a whole (79%)[1], high levels of deprivation exist within Bridge Close and its surrounding environs (assessed as 500 metres around the Order Land)[2]. The proportion of the population who reside within the most deprived quintile within the area (24%) is higher than within Havering (8%), Greater London (17%), and England as a whole (20%). Overall, 100% of the population within the assessed area reside within the top four deprivation quintiles, which is considerably higher than for Havering (78%), Greater London (89%) and England (81%)[3] as a whole.

2.6 The area in and around Bridge Close is also affected by antisocial behaviour and criminal activity. Data from the Metropolitan Police, in the 12 months from September 2024 to August 2025, records 29 serious incidents on or near Bridge Close of which approximately 14% relate to violence and sexual offences, 38% to burglary, robbery and other theft with the remaining 48% comprising drugs offences, violent crime, anti-behaviour and public order offences[4]. In the period from December 2022 to date, three cannabis farms were identified and closed in Bridge Close and a tenant vacated on suspicion of unlawfully hosting multiple occupiers and users of Class A drugs. Members of the Council's Planning and Public Protection Enforcement team regularly report of material fly tipping and abandoned vehicles on site.

2.7 The location of Bridge Close and its proximity to commuter links and retail uses, have resulted in the Order Land being allocated for residential-led redevelopment and it was declassified as strategic employment land in the 2008 Local Development Framework (this was endorsed by the 2015 Havering employment land review produced as evidence for the new Local Plan).

2.8 There is a significant need for housing and regeneration in the area and the current uses are inappropriate in this location and fail to meet the Council's regeneration objectives. The current uses also discourage public realm activity which can lead to underutilised and dead spaces, reduced personal security and an increased risk of crime.

2.9 The Council considers the comprehensive development of Bridge Close, an underutilised brownfield site, will enable the creation of a vibrant new residential-led mixed-use quarter of Romford where people will wish to live, work and play. The development will also provide environmental improvements to the River Rom, including a new bridge, which will provide

[1] Office for National Statistics Annual Population Survey 2021.
[2] Demographic analysis in the Equalities Impact Assessment considers an area of 500 metres around the CPO Red Line Plan boundary of the Bridge Close Regeneration site.
[3] The ONS 2020 mid-year population estimates and MHCLG 2019 Indices of Multiple Deprivation
[4] Havering Borough Council (Enforcement, Planning & Public Protection), London Metropolitan Police

a critical pedestrian and cycling link to Romford bus and train stations, thereby enhancing east-west connections within the Town Centre.

2.10 In order to facilitate the regeneration of Bridge Close it will be necessary to relocate HICC, which plays an important role in the East London Islamic community and also undertakes a range of charitable activities that benefits the local community generally. It is important that HICC remains in an easily accessible location in Romford Town Centre, but suitable alternative sites in the town centre are extremely limited. Following a lengthy search, an alternative site at 222-226 South Street has now been identified and has been agreed by the Council and HICC as being the only suitable off-site relocation opportunity that is suitable and meets HICCs needs. Although 222-226 South Street is occupied by a number of business occupiers, its current owner has aspirations for development in the short to medium term, and the occupiers either hold short term leases, or leases with break clauses that permit early development.

2.11 In January 2023, HICC met with the LPA to discuss proposals to develop 222-226 South Street for its use. Following the meeting the LPA confirmed that HICC's use was acceptable in principle, subject to scale and providing suitable infrastructure. Taking account of the LPA's feedback, HICC has submitted a pre-application advice request for a detailed development proposal. It is understood that pre-application discussions are ongoing and that the HICC intends to submit a formal planning application once the outstanding issues have been resolved.

2.12 HICC's relocation to 222-226 South Street will protect the important role it plays in the community and allow that role to be expanded and enhanced to meet the needs of the growing local Islamic population.

Scheme Evolution

2.13 In response to its regeneration priorities, the delivery of the Scheme has been a key ongoing policy objective of the Council. Bridge Close is occupied by mixed industrial, warehouse and ancillary units, an ambulance station, an Islamic Cultural Centre and a number of terraced residential properties fronting Waterloo Road and Oldchurch Road. The site was and continues to be in multiple ownerships and for some years one of the main landowners had been attempting to bring forward a comprehensive redevelopment.

2.14 The 2008 Local Development Framework declassified the site as strategic employment land and was subsequently endorsed by the 2015 Havering employment land review produced as evidence for what was the emerging new Local Plan at that time. The Romford Development Framework, approved by Cabinet in 2015, identified Bridge Close for comprehensive redevelopment with the potential to provide a significant quantum of new homes.

On 15th June 2016, Cabinet agreed to the principle of developing the land at Bridge Close in accordance with planning policy and approved the vision for a new residential neighbourhood supported by planning guidance for the comprehensive development of the site with a focus on new residential development, a new east-west route linking the site to the station and environmental improvements to the River Rom. Cabinet also authorised the negotiation of suitable arrangements with developers to deliver the Council's vision and to commence the process of acquiring land. Cabinet agreed to enter into an Overarching Borough Agreement ('OBA') with the Greater London Authority ('GLA') to accelerate housing delivery. Prior to the Cabinet decision, in March 2016 the GLA designated Romford Town Centre a Housing Zone for the delivery of up to 3,304 new homes of all tenures. Funding of £34.9 million was indicatively allocated to the zone to unlock and/or accelerate

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housing and to regenerate the area. Following this designation, the GLA and the Council entered into the OBA in September 2016, which formalised the indicative allocation.

2.15 The business case and financial model underpinning Cabinet's decision of 15th June 2016 anticipated the delivery of the following:

- 1,070 new homes (including affordable homes)
- A 3 form entry primary school
- A local health facility
- Commercial floor space, likely to be flexible workspace and small retail/ leisure.
- A new pedestrian and cycle bridge from Bridge Close to near Romford station
- Environmental improvements to the River Rom

2.16 On 15th November 2017, Cabinet approved the establishment of a dedicated special purpose vehicle with delegated authority to enter into all relevant legal arrangements to bring forward a joint venture ('JV') partnership with a private sector partner.

2.17 The JV, Bridge Close Regeneration LLP ('BCR LLP'), was established on 28th February 2018 in the form of a Limited Liability Partnership between London Borough of Havering (50% interest) and a Special Purpose Vehicle ('SPV') owned by Savills Investment Management Limited and First Base Limited (50% interest). A comprehensive suite of project documents was completed and an initial business plan and funding envelope were adopted to underpin the full delivery of the Scheme. Significant property interests were transferred to the JV and the commercial principles for the potential use of the Council's compulsory purchase powers as a means of last resort was enshrined in the agreements.

2.18 On 28th February 2018 the GLA approved a grant totalling £12.4 million to enable the Council to purchase affordable housing from BCR LLP. A Borough Intervention Agreement ('BIA') was entered into between the GLA and London Borough of Havering in respect of the £12.4 million Housing Zone grant funding in March 2018. The BIA also set out the Council's obligations to procure the delivery of non-housing outputs, including the school, the health centre and a quantum of commercial floor space.

2.19 In accordance with the adopted Business Plan and relevant polices, by June 2018 BCR LLP had appointed a comprehensive design and technical team to progress the development of the planning application for Bridge Close and by September 2019, proposals had been developed in substantial form for the submission of that planning application. Similarly, land assembly activity and local engagement continued, leading to a number of additional commercial and residential properties being acquired.

2.20 In the early part of 2020, a deterioration in the housing market, exacerbated by the outbreak of the Covid-19 pandemic, together with a significant increase in build costs began to have an impact on the commercial viability of the Scheme. A number of strategies were proposed to deal with the issue, but they were unable to overcome all of the challenges to viability or, without further intervention, to generate the returns necessary to meet the hurdle rates of the SPV and the potential requirements of third party funders. As such, the SPV, led by Savills Investment Management, advised that it was unwilling to raise further funds beyond the funding commitments set out in the approved Business Plan until the problems with viability were resolved.

2.21 In view of the practical difficulties of implementing the JV business plan, and being mindful of the Council's commitment to bringing about a comprehensive redevelopment of Bridge Close, on 16th September 2020, Cabinet approved the proposal for the Council to acquire the interest held by the SPV in BCR LLP. In October 2020 the Council completed the acquisition thereby safeguarding the regeneration of Bridge Close.

2.22 On 16th December 2020, Cabinet approved a proposal for the Council to wholly fund and deliver the regeneration of Bridge Close through BCR LLP. The budget for funding was endorsed by Full Council on 3rd of March 2021.

2.23 A team of masterplanners, architects, engineers and technical advisors were subsequently assembled to take the Scheme forward. Having regard to the passing of time and changes to planning policy and regulatory requirements, material amendments were made to the Scheme in favour of centralised, site-wide district heating, enhanced fire safety regulations, and a number of other design matters. Public consultation events were held in October 2022 and further consultation continued with the Local Planning Authority ('LPA') and other stakeholders.

2.24 In March 2021, to ensure delivery of the regeneration at Bridge Close, the GLA approved[5] the reprofiling of £12.4 million in grant already committed to support the Council in the buy-out of their JV partner, land assembly and other related costs to facilitate the development of the Scheme. The GLA also granted approval to extend completion dates in the Romford Housing Zone for the Bridge Close intervention to 31 March 2029.

2.25 In August 2023, the Council's Cabinet approved the, in principle, inclusion of additional land at 222-226 South Street in the Bridge Close CPO, as a last resort, if the site could not be acquired by agreement. 222-226 South Street has been identified as the only site suitable for the purpose of relocating the HICC, which currently occupies land and buildings at Bridge Close. The inclusion of 222-226 South Street was considered in the approval by Cabinet of the Bridge Close Regeneration LLP Business Plan 2024-2025 on 7th February 2024.

3.0 Location and Description of the Order Land

3.1 The main part of the Order Land measures approximately 3.94 hectares in total and is broadly rectangular in shape, as illustrated in the plan at Appendix A. To the south and west of the Order Land is the Romford Ring Road (Oldchurch Road (A1251) to the south and Waterloo Road (A125) to the west), while to the east of the site is the River Rom. To the north the Order Land is bounded by the railway and adjacent Network Rail land. The 222-226 South Street site is situated to the southeast of the main site, on the south side of Oldchurch Road (A1251) and on the west side of South Street.

3.2 The Order Land is currently accessed from the south-west, off the Old Church Roundabout. Historically, the only other public access point into it was an informal pedestrian footbridge across the River Rom on the eastern boundary of the Order Land, from Regarth Avenue. The footbridge has been closed owing to health and safety concerns.

3.3 The Order Land currently comprises a range of industrial and commercial buildings extending to between one and two commercial storeys in height (Class Eg, B2, B8, and Sui Generis uses), together with residential properties along the Waterloo Road and Oldchurch Road frontages, an ambulance station and the HICC.

3.4 222-226 South Street has an area of circa 0.32 hectares and is of irregular shape, as illustrated in the plan at Appendix A. The site is situated circa 100 metres to the southeast of Bridge Close, at the junction of South Street and Thurloe Gardens (A1251). The site is bounded by South Street to the east, the River Rom to the west, commercial premises to the north and commercial and residential premises to the southeast.

[5] GLA Decision DD2507 pursuant to prior Decision DD2215.

3.5 222-226 South Street is currently accessed from Thurloe Gardens and comprises a single storey, locally listed, former builder's merchant premises (last used as a restaurant), a range of other single and two storey commercial premises and a car parking area.

3.6 The Order Land is located within Romford Town Centre, defined as a Metropolitan centre and an Opportunity Area (OA) with potential for 5,000 new homes and 500 new jobs by 2041 within the London Plan. Existing neighbouring land uses to the main Bridge Close site include a mix of residential and commercial development to the east, south and west of the Order Land, including a Lidl supermarket to the east. Queen's Hospital is located approximately 0.2 km to the south-west of the Order Land. Romford Station is located immediately north of the Order Land.

3.7 The boundary of the Order Land is shown edged red on the Order Map. The land coloured [pink] identifies the land over which the Council seeks to compulsorily acquire a number of third-party freehold and leasehold interests ("the [Pink] Land") in order to deliver the Scheme. The land coloured [blue] identifies the land over which new rights over land are proposed to be created and acquired compulsorily ("the [Blue] Land") to facilitate the delivery of the Scheme. These rights are for [crane oversailing, to erect and use scaffolding, carry out highway and landscaping works, storage of plant and equipment, and access]. Further information on the rights sought over particular parts of the Order Land is provided at paragraph [11.0] below.

3.8 Development of the Order Land requires the acquisition of a number of property and land interests. Ardent have been appointed to provide specialist advice to the Council in respect of land assembly and the promotion of a CPO, including land referencing. Ardent have also compiled property cost estimates for all the acquisition sites including valuations and additional compensation assessments.

3.9 The land referencing undertaken by Ardent has identified 111 registered freehold interests and 6 registered leasehold interests within the Order Land which are affected by the CPO. With the exception of other land such as adopted highway and verge, the identified property interests include 16 premises in business use, 4 premises in religious/community use, 2 properties in mixed use, 37 residential properties, 1 electricity substation, and 1 pumping station.

3.10 As at September 2025, the Council has successfully concluded the acquisition of 47 legal property interests (46 being freehold interests and 1 being a long leasehold interest – as a number of properties are made up of multiple legal freehold interests, this comprises 33 residential properties and 8 properties in business use) has been successfully concluded. The Council now therefore owns or controls 70% of the freehold interests in the Order Land by area.

3.11 For the remaining property interests, offers have been made for the acquisition of 17 freehold interests (including the freehold interest in 222-226 South Street) and 2 long leasehold interests (8 properties in business use, 5 residential properties and 1 other land interest) within the Order Land.

3.12 If the Order is confirmed, the Council intends to use its CPO powers to acquire land interests that it is unable to secure through private treaty negotiations.

3.13 Full details of the ownership of each interest in the land and the new rights comprised in the Order are contained in the Order Schedule (which can be inspected at the addresses given in Section [20.0 below] of this Statement). In respect of the Pink Land the Council is seeking the power to acquire all interests in the land unless expressly stated in the Order Schedule.

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4.0 Consultation and Engagement

4.1 Residents, businesses and other stakeholders have been consulted extensively about the regeneration of the area as a whole and on the redevelopment of the Order Land, in particular.

4.2 The planning application was submitted following extensive pre-application engagement with officers at the Council and the GLA. These conversations date back to early 2017, with most recent pre-application discussions taking place in November 2022.

4.3 A Planning Performance Agreement was entered into agreeing a number of pre-application meetings and workshops with officers at the Council leading up to the submission of the application.

4.4 The Scheme was presented to the Council's Quality Review Panel on three occasions: once in December 2018; once in June 2019; and most recently in September 2019. These sessions focused on the overall masterplan framework and parameter plans.

4.5 The Scheme has also been presented to the Council's Strategic Planning Committee (SPC) in January 2019, July 2019, September 2019 and most recently in October 2022.

4.6 The Statement of Community Involvement (SCI) has been prepared by Cascade Communications, the development proposals for the site have been discussed extensively with the public. In total, five public consultation events have been held (September 2018, November 2018, May 2019, September 2019 and in October 2022 at a range of venues including on site and within the Romford town centre shopping centres.

4.7 The consultation for the proposed redevelopment of Bridge Close has included:

- Individual meetings with local groups and stakeholders;
- Nine rounds of public consultation events at different venues in Romford Town Centre;
- Approximately 2,073 residents and stakeholders were engaged during a four-stage consultation from September 2018 to October 2022;
- 27 hours of community consultation events;
- 38,000 invitation letters to residential and commercial properties in the surrounding area, including over 50,000 emails to publicise the events;
- A dedicated project website;
- Over 116,224 residents viewing social media posts and 11,000 questions answered by respondents online; and
- Online and paper questionnaires to encourage responses.

4.8 As a result, the application has been informed by feedback from 506 questionnaire responses, 30 hours of public consultation carried out over six separate public consultation events, meetings with community groups, councillors and other stakeholders between 2018 and the point of submission.

4.9 The consultation process and methodology included:

- **Translations**: Language and braille translations of the consultation newsletters were offered to residents and members of the public.
- **Voice recording**: A voice recording was produced and issued to community and local groups in addition to the consultation invitation.

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- **Social media advertisements**: These were run in the days leading up to the consultation events, targeted at both a wide range of audiences and groups which fall under protected characteristics categories.
- **Newsletters**: Over 8,000 physical newsletters issued to households and businesses in Romford.
- **Questionnaires**: Feedback forms were provided at the in-person events and online on the website to enable residents share their thoughts on the proposals.
- **Consultation** events: Both in-person and online events were organised to give people flexibility and provide residents the opportunity to be involved in the consultation process, view the plans in details and speak directly with members of the project team.
- **Email notifications** to groups and stakeholders: Notifications were issued to identified local stakeholders and groups encouraging them to participate in the consultation process.

4.10 Feedback from attendees indicated significant support for the provision of the proposed community uses, the new links with the Town Centre, new opportunities for jobs and opening up of the River Rom.

4.11 Where potential concerns were highlighted by the public, the project team worked hard to try and address these where possible.

4.12 The consultations sought to gauge the support of local residents and stakeholders to the principles in the Housing Zone and Planning Framework. Community feedback on the proposals for Bridge Close have been largely supportive. A breakdown of specific feedback and responses is set out below.

Community facilities

4.13 The feedback from the consultation events showed that 75% of those who responded would like to see community facilities as part of the proposals. A new healthcare centre, primary school and community centre have been proposed within the submitted planning application. The HICC would have opportunity to take space within the new community facility, should it be their preference to do so, noting that BCR LLP is actively assisting the HICC in securing alternative premises at 222-226 South Street to provide the existing facility with options and flexibility in terms of continuing its operations within Romford. HICC has confirmed that it does not consider an on-site relocation to be viable and is concerned that its use will conflict with the proposed new residential development.

4.14 During the October 2022 consultation, a key point of discussion were concerns from HICC members as to a lack of reference to the organisation on the consultation materials and a lack of clarity on how their existing facility would be re-provided. The Applicant's representatives assured HICC members that discussions were ongoing and the relocation of HICC was a key element of the proposals.

New links

4.15 66% of respondents supported new links within the town centre. The new east-west link, across the River Rom through to Waterloo Road, would provide quicker and safer access to Romford Station and the town centre.

4.16 The site currently suffers from poor accessibility as it is constrained by the ring road, railway line and river. The proposals for Bridge Close would create new links and a gateway into the town centre. Opening-up new links across the site would enable easier access from the south and west of the site, particularly to Romford Train Station and Town Centre.

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River Rom

4.17 The current footbridge over the river was underused and felt unsafe to many residents, noting that post-consultation, the bridge has been closed for health and safety reasons since circa 2023. 60% of respondents to the consultation were in favour of revitalising the River Rom.

4.18 Acknowledging the importance of the River Rom, the proposals comprise restorative works to the River Rom, including naturalising the flow of the river and providing additional landscaping and planting of a range of species along the banks to encourage biodiversity. A new pedestrian and cycle bridge over the River Rom and a public route will be created along the river for use by pedestrians and cyclists and will include informal play and communal amenity space transforming the area into an open, attractive and active public space.

Parking and transport

4.19 Concerns were expressed about issues relating to parking or traffic in the town centre, with respondents expressing a desire for increased accessibility to the town centre and public transport.

4.20 In response to the feedback, the proposals will include:

- Car-light development.
- Dedicated disabled parking in an accessible location close to the new health centre.
- Increased accessibility to town centre and train station to limit need for vehicles.
- Traffic management measures.
- Implementation of a Travel Plan which will promote alternatives to the car use for both residential and commercial occupiers.
- Increased use of alternate forms of travel. E.g. Provision of safe and accessible cycle racks or lockers and cycle paths.
- Provision of car club spaces to promote the sustainable use of motor vehicles.
- School Street
- Independent, self-contained parking facilities would be provided for HICC at 222-226 South Street

5.0 Order Scheme

5.1 The following sections describe the full and outline elements of the hybrid planning application comprising the Order Scheme in more detail. The overall Scheme is delivered in three phases.

5.2 A hybrid planning permission is expected in the fourth quarter of 2025 with planning reference P1765.23. Full details for were submitted for Phase 1 as part of the hybrid application, comprising Plots A and B. Specifically, this element of the hybrid application includes:

- Erection of two buildings on Plot A and two buildings on Plot B to provide 383 residential units (Class C3).
- 1,911 sqm (GEA) of commercial floor space (Class E use).
- A 4,202 sqm (GEA) three form entry primary school and nursery (Class F1(a)).
- Provision of pedestrian/cycle bridge.
- New vehicular and pedestrian arrangements.

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- A new public square and civic square.
- New public realm works.
- Associated infrastructure and works incidental to the proposed development.

5.3 The outline elements covered the remaining development parcels with the planning application seeking approval for the following:

- Up to 687 residential dwellings (Class C3).
- Community floor space of up to 2,768 sqm (GEA), comprising a flexible health centre / commercial unit (Class E / F1 / F2) and a community centre (Class F1 / F2).
- Up to 4,045 sqm (GEA) commercial floor space (Class E use), comprising office and flexible workspace, retail use, professional services and leisure use.
- Together with associated infrastructure, alterations to and provision of new vehicular and pedestrian access points.
- Public open space, including a riverside walk.
- Car, motorcycle and bicycle parking spaces and servicing spaces; and
- Other works incidental to the proposed development.

5.4 The Varied Scheme comprises up to 896 units in total of which 35% of the total number of habitable rooms will be affordable housing. This equates to a reduction of up to 174 residential units from the original scheme. It also includes the removal of the flexible health centre / commercial uses from Plot C1 and appropriate mitigation in the form of alternative health space in a future phase or an appropriate financial contribution will be provided.

5.5 As set out in the Development Management Procedure Order (2015), details will be submitted in relation subsequent phases for approval with respect to the following reserved matters:

- **External Appearance** - the aspects of a building or place within the development which determines the visual impression it makes,
- **Landscaping** - the treatment of land (other than buildings) for the purpose of enhancing or protecting the amenities of the site and the area in which it is situated, for example through the planting of trees or hedges or provision of gardens, courts and other amenity features.
- **Layout** - the way in which buildings, routes and open spaces are provided within the development and their relationship to buildings and spaces outside the development.
- **Scale** - the height, width and length of each building proposed in relation to its surroundings.

5.6 In seeking to demonstrate the deliverability of the proposed masterplan approach a set of Parameter Plans have been prepared, which will become approved drawings. These will inform future reserved matters applications for the remaining parts of the site and include the following:

- Parameter Plan 1: Access and Movement (Drawing No. 1396-FPA-ZZ-ZZ-DR-U-16005 03);
- Parameter Plan 2: Development Plots (Drawing No. 1396-FPA-ZZ-ZZ-DR-U-16006 02);
- Parameter Plan 3: Building Heights (Drawing No. 1396-FPA-ZZ-ZZ-DR-U-16007 02); and
- Parameter Plan 4: Open Space Parameter (Drawing No. 1396-FPA-ZZ-ZZ-DR-U-16008 02).

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5.7 Further details pursuant to future reserved matters submissions for Phases 2, 3a and 3b are contained within the Design Code submitted with the application. The illustrative masterplan and phasing is set out in the plans below.



Figure 1. Order Land Illustrative Masterplan, Bridge Close, Romford



Figure 2. Order Land Contstruction Phasing

5.8 The intention is for the development to be phased, which will allow the existing community use undertaken by HICC to remain operational during the early part of the construction works until such time as the relocation of the HICC has taken place. The new community facility will be delivered in Phase 3a within Block D1. The existing HICC facility (at 91 Waterloo Road) is located within Phase 3b and would be retained until Block D1 has been fully completed and ready for occupation.

5.9 Further to details set out in 1.4 and 5.4 above, the Varied Scheme would allow for the London Ambulance Service to continue operating from existing premises. Appropriate arrangements have been made to ensure continuity of service throughout the delivery of Phase 1 of the Scheme and in perpetuity

6.0 Planning Policy Context

6.1 The following paragraphs summarise how the Scheme meets key national, regional and local planning policies and supplementary planning policy objectives for the purpose of paragraph 76 of the MHCLG Guidance.

National Policy

6.2 The National Planning Policy Framework ("NPPF") was published in December 2024 and replaces the previous national planning guidance. The NPPF sets out the Government's

economic, environmental, and social planning policies and is a material consideration in the consideration and determination of planning applications.

6.3 The following summarises some of the key national level polices set out in the Framework:

- At the heart of the NPPF is a presumption in favour of sustainable development which should be pursued in a positive way (Paragraph 10).
- The Council's latest authority monitoring report (AMR) (2023-2024) states that LBH is only able to demonstrate a housing land supply of 2.9 years (including 20% buffer). The Council is therefore unable to demonstrate a 5 year supply of housing land which consequently means that the tilted balance is engaged in line with Paragraph 11d of the NPPF. Consequently, proposals in accordance with development plans should be approved unless "adverse impacts would significantly and demonstrably outweigh the benefits" (Paragraph 11).
- Design quality should be considered throughout the evolution and assessment of individual proposals highlighting the benefits of early discussions between applicants and interested parties (Chapter 12).
- Paragraph 78 identifies the importance of a Local Authority demonstrating a five-year supply of deliverable housing sites, with the appropriate buffer.
- Policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions (Paragraph 124).
- Planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land (Paragraph 125(c)).
- Policies and decisions should support development that makes efficient use of land, considering the need for different types of housing/development, availability of land, the capacity of infrastructure, the character and setting of a particular area and the importance of design (Paragraph 129).
- The creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve (Paragraph 131).
- Planning policies and decisions should ensure that developments function well and improve the quality of an area over the development lifetime, area visually attractive, sympathetic, focus on a sense of place, optimise sites and create places that are safe, inclusive and accessible (Paragraph 135).

Regional Policy

6.4 **London Plan 2021**

6.4.1 The London Plan was adopted in March 2021. Policy H1 of the London Plan relates to increasing housing supply and Table 4.1 sets the ten year target for net housing completions that each local planning authority should plan for. For the Council, the ten-year housing target has been increased to 12,850 dwellings across the ten-year period. This equates to an annual target of 1,285 homes.

6.5 The site is located within the Romford Opportunity Area as designated under the adopted London Plan. The London Plan promotes growth in the identified opportunity areas and provides an indicative housing and employment capacity for the opportunity area to provide 5,000 new homes and 500 new jobs.

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6.5.1 London Plan Policy H4 sets a strategic target for 50% of all new homes delivered across London to be genuinely affordable. The policy aims to achieve this by delivering at least 50% affordable housing on public sector land, where there is no portfolio agreement with the Mayor. Where an application does not meet the requirements in terms of the target % provision and target tenure split, then it must follow the Viability Tested Route.

6.5.2 The London Plan is also supported by a number of Supplementary Planning Guidance (SPG) documents including the following:

- Affordable Housing and Viability (2017)
- Housing SPG (2016)
- Shaping Neighbourhoods Accessible London: Achieving an Inclusive Environment SPG (2014)
- Sustainable Design and Construction SPD (2014)
- Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)

Local Policy

6.6 **Havering Local Plan 2016-2031**

6.6.1 The Havering Local Plan sets out the Borough's vision for development up to 2031.

6.6.2 Within the Local Plan, the Bridge Close site forms part of the Romford Strategic Development Area. Policy 1 states that the Council will support the delivery of over 6,000 new high quality homes in well managed residential and mixed use scheme that provide attractive places to live and which are well integrated with the existing community.

6.6.3 To inform the recently adopted Local Plan the Council prepared an Addendum to the 2015 Employment Land Review (2018). In summary, the 2015 Employment Land Review stated:

"Bridge Close is a mixed town centre industrial estate with older buildings. It has several non-industrial uses within it including a gym and several places of worship. It is a fragmented industrial cluster with poor parking, poor quality environment and buildings that are no longer fit for purpose for modern business occupiers. It is earmarked in the emerging Romford Development Framework as a site that could be released from industrial employment uses and redeveloped for mainly high density residential (around 650 units). The most current proposals outlined in the Draft Romford Development Framework also include proposals for around 950 m2 of office uses."

6.6.4 Within the 2018 Addendum none of the new recommendations changed the original recommendation relating to the Bridge Close site. As such, the site continues to be identified for residential purposes, with Paragraph 9.1.6 of the Local Plan reiterating the conclusions of the Employment land Review as follows:

"…The Employment Land Review advises that 24ha of employment land can be released over the Plan period. The previously designated land recommended for release comprises 2.7 ha at Crow Lane (Romford gas works), 15.4 ha at Rainham West and 1.4 ha at Bridge Close, Romford. The de-designation of these sites will facilitate the delivery of new residential developments and make a significant contribution towards meeting the borough's housing need."

6.7 **Romford Area Action Plan (2008) – Saved Site Allocation**

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6.8 The site is allocated for mixed-use development within the saved site allocations of the Romford Area Action Plan (ROMSSA2). The allocation seeks residential development with some commercial uses (A3), now Class E. A number of design parameters are suggested:

- Residential development is within the 240-435 units per hectare density range;
- A3 uses are at ground level and located along the River Rom frontage;
- The development incorporates new public spaces;
- The amenity, recreational and ecological value of the River Rom is enhanced, including the development of a riverside pedestrian route;
- The development is sensitive to the privacy and amenity of the existing housing along Waterloo Road and Oldchurch Road;
- Assistance is provided to existing businesses to find alternative locations; and
- The nearby Borough Site of Importance for Nature Conservation is protected and enhanced.

6.9 **Romford Town Centre Development Framework (2015)**

6.9.1 In addition, the Romford Town Centre Development Framework ("RDF") (2015) is a material planning consideration in the preparation of the emerging development proposals for the site. The RDF also identifies the site, including the properties on Waterloo Road and Oldchurch Road, as suitable for comprehensive redevelopment to provide approximately 840 residential units, some ancillary community uses, 2,700 sqm of commercial space and new public open space. The residential-led mixed use scheme proposed accords with the range of uses suggested in the RDF, including the provision of a significant number of new homes, flexible employment and other commercial floorspace and new community floorspace, including the provision of a new primary school. Whilst the proposed scheme exceeds the suggested, approximate quantum of development set out in the RDF, it is considered appropriate given the need to optimise the development potential of this sustainable, brownfield site and has been agreed with officers during pre-application discussions. Importantly the proposed density range is within the requirements set by the Romford Area Action Plan. The densification also aligns with the sites location within Romford Opportunity Area.

6.9.2 Moreover, the Havering Local Plan identifies that over 6,000 new homes will be delivered within the Romford Strategic Development Area (wherein the application site is situated) over the Plan Period, at least 5,000 of which will be built over the first ten years. The development of this site for a residential-led mixed use scheme will contribute significantly to this target.

6.10 **Romford Town Centre Masterplan**

6.10.1 Reflecting the significant opportunities that Romford offers and the importance of successfully integrating new schemes with existing developments and communities, the Council adopted the Romford Town Centre Masterplan Supplementary Planning Document (SPD) in March 2025

6.11 The applicant has worked with the Council Masterplan Team to make sure that the proposed development at the site is co-ordinated with the overall approach for the Town Centre to ensure a joined-up approach.

6.11.1 The proposed development accords with this direction of travel and the strategic allocations. It forms a significant site within the town centre and the proposed scheme will act as a catalyst for further investment and work in the local area. It will also ensure the beneficial reuse of a prominent and sustainably located brownfield site and provide a high quality residential-led development that will deliver a significant number of social, economic

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and environmental benefits, including the delivery of new homes, open space, accessibility links and community facilities.

7.0 Planning Programme

7.1 The principle of the proposed redevelopment of the site is acceptable and in accordance with planning policy. The hybrid planning application for the comprehensive re-development of the site was submitted at the end of 2023, and following comments from statutory consultees and subsequent design revisions required to address the outstanding issues, a formal resubmission pack was submitted in May 2025. On 28 August 2025, London Borough of Havering's Strategic Planning Committee (SPC) resolved to grant planning permission for the re-development scheme. BCR LLP are currently in the process of drafting the Section 106 legal agreement with the Council ahead of referral back to the Mayor of London for final direction. Planning permission is expected to be granted in December 2025. Following the grant of planning permission, which is expected in December 2025, it is anticipated that separate but concurrent Section 96a and Section 73 applications will be submitted to vary the planning permission in order to retain the London Ambulance Service ("LAS"), in situ. These applications are expected to be granted in September 2026. Post submission a number of matters were raised in relation to 'in-principle' items with regard to the re-provision of social infrastructure. Appropriate solutions were reached with regard to re-providing existing social infrastructure in respect of Planning Policy and the conclusions of the SPC report are summarised below.

8.0 Material Planning Considerations

8.1.1 In relation to compliance to the three strands of sustainability, the proposals will deliver a range of social, economic, and environmental benefits as follows:

i. **Social**: The development will support a strong, vibrant and healthy community by providing a range of new homes suitable for first-time buyers, families and people looking for affordable and shared ownership homes. The development will deliver a significant number of new homes, contributing towards the boroughs housing target and responding to local need, and will ensure that an increased range of homes are provided to meet the needs of present and future generations. All are designed as Part M4(2) accessible, with 10% designed to M4(3), and are able to be adapted for people with different abilities. The new homes will be provided with spacious internal areas meeting the internal floor area standards set out in the Nationally Described Space Standards and all with private amenity space in the form of balconies and terraces. The units will also benefit from access to further high quality communal amenity space and playspace across the site. The development will also provide a range of new community facilities, including a new primary school and community centre and health centre which will be well located and accessible for use by both existing and future residents. The new community centre will also be made available to the existing social infrastructure groups on site if required by the group. The development is well-designed with high quality landscaped areas and open space and will provide a safe built environment, with excellent pedestrian accessibility to the wider area, including a new east-west link through the site and signalised pedestrian crossing on Waterloo Road, providing better connections to the town centre, station and local services.

ii. **Economic**: The proposed development will contribute to helping build a strong, responsive and competitive economy, by bringing forward housing and commercial floorspace on an allocated housing site. The development will support growth of the local economy during the construction period and also provide long-term additional spend in the local economy as new residents move into the area and use local shops,

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and spend money on local services. A number of direct and indirect jobs will also be supported during the construction period. A range of new commercial facilities will be provided as part of the scheme which will strengthen and diversify the retail and commercial offer within the town centre. Principally, the development will also provide a range of new flexible employment floorspace which will deliver a significant number of new jobs and enhance the economy and employment offer for Romford. In addition, 20% of the workspace across the development will be affordable. The employment floorspace on the site has been designed to comprise flexible, modern workspace to ensure it is attractive to a range of occupiers over the lifetime of the development, including potential local SME's and providing opportunity for existing businesses to be retained within the Borough. The proposed commercial floorspace will also help to activate the ground floor of the development and support the other retail and leisure uses proposed. The flexible commercial floorspace at ground floor will also generate further employment opportunities, dependent on the final mix of uses and occupiers which will provide local employment opportunities and will benefit the local economy via business rates, direct and indirect spend and the new commercial floorspace could contribute towards business rates annually.

iii. **Environmental**: The proposed scheme will contribute to protecting and enhancing the natural environment, seeking to optimise the development potential of this previously developed site in a highly sustainable location within the town centre. The removal of the existing poor quality buildings and redevelopment to provide a high quality residential-led mixed use scheme will improve its overall visual appearance. The proposals seek to introduce a mixture of landscaping and planted elements which will be used to form high quality public realm and amenity space and will provide a high quality landscaped focus for the development. The development will provide a net benefit in biodiversity through a significant amount of landscaping and planting of a range of species planted to encourage biodiversity. The proposals also comprise restorative works to the River Rom, including naturalising the flow of the river and providing additional planting and landscaping along the banks. A new public route will be created along the river for use by pedestrians and cyclists and will include informal play and communal amenity space. The development has been designed to be predominantly car free, with a number of new footbath links through the site toward Romford Station and the town centre. The proposals comprise the redevelopment of previously developed land that is free from any environmental, archaeological, landscape or ecological constraints. The effects in relation to servicing, drainage, flood risk, arboriculture, air quality, archaeology, ecology, energy, sustainability, overheating, utilities and services, archaeology, contamination, crime prevention have all been assessed and mitigated as required.

8.2 It is considered that the proposed development meets the three requirements which define sustainable development in line with the NPPF.

8.3 **Housing Provision**

8.3.1 The need to provide new housing across London is recognised at the national, regional and local level as a key planning objective. Providing new homes in Havering is a key priority for the Council.

8.3.2 The Havering Local Plan specifically identifies the Order Land as a location where a significant number of new homes can be delivered to help meet the Boroughs housing need.

8.3.3 The proposed development will make a significant contribution to the Council's annual housing target and assist in addressing the existing shortfall of housing in the Borough and

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meeting London Plan targets. The provision of up to 1,070 residential dwellings on the site would contribute to 85% of the Council's annual housing target in the adopted Local Plan and 83% towards the Council's annual housing target in the London Plan.

8.4 **Proposed Commercial Uses**

8.4.1 The masterplan includes the provision of up to 5,956 sqm (GEA) of flexible commercial floorspace across the whole site. This will include a mix of retail uses, new employment floorspace comprising office and makerspace and leisure uses (Class E). The space will enhance the boroughs employment, retail and social infrastructure offer, and will activate the ground floor and public realm across the Scheme, to provide a dynamic location linked to Romford town centre.

8.4.2 The mix of commercial uses identified are considered to be appropriate given the location of the site within the town centre and have been designed to complement the existing local offer and encourage economic growth in Romford. The provision of flexible commercial floorspace is considered acceptable in principle, given that the site is allocated for mixed-use development in the Romford Area Action Plan (2008).

8.4.3 The Scheme is a truly mixed-use development which will deliver a number of planning and regeneration benefits, including the provision of a significant amount of high quality, flexible and affordable employment floorspace that will be suitable for a range of occupiers. The amount of floorspace proposed is considered to be appropriate, having regard to London Plan Policies E1, E3 and E7 and the relevant Local Plan policies, including the sites allocation within the Romford AAP (2008), and taking account of the need to provide other uses including a significant number of new homes and new community uses.

8.5 **Reprovision of Social Infrastructure**

8.6 The proposed development involves the demolition and redevelopment of all of the existing buildings on the site, including those occupied by the faith and community groups. However, the outline element (Phase 2 & 3) of the planning application provides for up to 2,768 sqm of flexible new community floorspace, Class F1 (Learning and Non-Residential Institutions) and Class F2 (Local Community) which would be available to use by the existing community group should they wish to remain on site.

8.6.1 The majority of the Order Land, including the buildings occupied by HICC and other faith groups, are allocated for comprehensive redevelopment within the Romford Area Action Plan (site ref. ROMSSA2). In addition, the Town Centre Development Framework document (2015) identifies the HICC premises as part of a wider redevelopment opportunity, and makes clear that a comprehensive approach to redevelopment is required.

8.6.2 The Council considers it appropriate for the whole site to be coming forward comprehensively through a holistic masterplan approach that includes the redevelopment of the buildings occupied by the HICC and other faith groups.

8.7 The development plan requires re-provision of social infrastructure facilities in circumstances where there is a defined need and the Council has carefully considered how to address this requirement. The Council is providing assistance and compensation, where appropriate, for faith groups to relocate.

8.8 The Applicant and has identified an alternative site in Romford for HICC (which HICC has agreed meets its needs) and has agreed to acquire this site, either by agreement, or if that proves to be impossible, as part of the CPO process. It is acknowledged that the SPC report sets out the hybrid application includes 2,768 sqm of flexible space, with 1,001 sqm

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specifically allocated for a community centre within Block D1, which could accommodate the HICC onsite if necessary, in order to accord with Policy 16 of the Local Plan. However, the SPC report also identifies that HICC has expressed concerns that the proposed facilities may not adequately meet their current and future needs. It is understood from the HICC that this remains the case and that the HICC require an off-site solution.

8.9 In January 2023, HICC met with the LPA to discuss proposals to develop 222-226 South Street for its use. Following the meeting the LPA confirmed that HICC's use was acceptable in principle, subject to scale and providing suitable infrastructure. Taking account of the LPA's feedback, HICC has submitted a pre-application advice request for a detailed development proposal. It is understood that pre—application discussions are ongoing and that the HICC intends to submit a formal planning application once the outstanding issues have been resolved.

8.10 **Housing Mix**

8.10.1 A flexible housing mix is required in order to take account of the location of the site within an area of change, market demand and housing needs over time. The details of the housing mix for the outline element of the scheme are to be agreed at Reserved Matters stage. However, a development specification was submitted with the hybrid application that sets out the parameters for the housing mix of the outline element comprising: 42% 1-bed units, 47% 2-bed units and 12% 3-bed units. The final details of the housing mix will be determined through reserved matters approvals.

8.10.2 The housing mix for the detailed element of the scheme (Phase 1)has been fixed. The first phase will comprise two Plots, Plot A (229 dwellings) and Plot B (154 dwellings), providing a total of 383 dwellings. The mix of housing types proposed is as follows:

Unit Type	Affordable Rent	Shared Ownership	Private	Total	Unit Percent
1B2P	11	27	98	136	35%
2B3P	15	33	45	93	24%
2B4P	7	16	95	118	31%
3B4P	1	1	0	2	0.5%
3B5P	5	10	16	31	8.8%
3B6P	0	0	1	1	0.2%
4B6P	0	0	1	1	0.2%
4B7P	0	0	1	1	0.2%
Total	39	87	257	383	100%

8.10.3 The proposed mix provides a range of unit types and sizes across each tenure and is considered appropriate for the site. The variety of units will assist in creating a mixed and balanced community, meeting identified local needs and according with Policy 5 of the Local Plan which recognises the need to have regard to site specific circumstances and constraints of the site.

8.11 **Affordable Housing**

8.11.1 The policy requirement to provide affordable housing on site is clear. Subject to viability considerations, it is proposed that the Scheme provides a policy compliant 35% affordable dwellings across the development; comprising 70% shared ownership and 30% social rent tenures. In designing this scheme, the following objectives have been targeted:

- On-site delivery of affordable homes;
- Maximise the provision of affordable homes through the provision of shared ownership accommodation; and

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- The delivery of 35% affordable dwellings (calculated on the basis of habitable rooms) across the whole development.

8.11.2 Phase 1 of the Scheme will provide 126 affordable residential units (33% when calculated by unit numbers and 35% on a habitable room basis), with a split comprising 69% intermediate and 31% affordable rent tenures.

8.11.3 Within Plot B, 126 of the units will be delivered as affordable; 39 of the units are affordable rent and 87 of the units are intermediate. The remaining units in Plot B (28 units) are private for sale.

8.11.4 Plot A will comprise entirely private for sale housing (229 residential dwellings).

8.11.5 Overall, the Scheme will provide a mix of units types and tenures that respond to local needs and will assist in providing a mixed and balanced community on the site. The proposed affordable housing offer has been subject to rigorous viability testing and comprises more than the maximum reasonable amount of affordable housing that the scheme can deliver, in accordance with relevant planning policy at all levels.

The Varied Scheme

8.12 The Varied Scheme will result in a reduction in the overall number of units by 174 dwellings in comparison with the 'up to figure' of 1,070 dwellings in the original scheme. A total of up to 896 dwellings will be proposed in the Varied Scheme with 35% of the total number of habitable rooms being provided as affordable housing. The key matters for consideration in respect of the Varied Scheme and the retention of the LAS on site include:

- Meanwhile and long term car parking for the LAS and how this is secured. A separate planning application will be submitted to enlarge the existing LAS car park to ensure there is no loss of car parking capacity;

- Amendments to the access strategy and the submitted Access and Movement Parameter Plan which shows a pedestrian and cycle route along the River Rom on the eastern boundary of the LAS site. An alternative route would need to be diverted to the west of the LAS site. The vehicular access strategy will also be amended to enable access to the LAS site to be retained;

- Relationship between the LAS building and the remainder of the Phase 2 parcel and also the school site in Phase 1; and

- Amendments required to public open space and green infrastructure in the masterplan.

9.0 Development Plan Compliance

9.1 The Scheme and the Varied Scheme comply with the development plan as a whole. The key development plan policies are summarised below.

9.2 **London Plan (2021):** Policy SD1 (Opportunity Areas); Policy SD6 (Town centres and high streets); Policy SD7 (Town centres: development principles and Development Plan); Policy SD10 (Strategic and local regeneration); Policy D1 (London's form, character, and capacity for growth); Policy D2 (Infrastructure requirements for sustainable densities); Policy D3 (Optimising site capacity through the design-led approach); Policy D4 (Delivering good design); Policy D5 (Inclusive design); Policy D6 (Housing quality and standards); Policy D7 (Accessible housing); Policy D8 (Public realm); Policy D9 (Tall buildings); Policy D11 (Safety, security and resilience to emergency); Policy D12 (Fire safety); Policy D13 (Agent

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of Change); Policy D14 (Noise); Policy H1 (Increasing housing supply); Policy H4 (Delivering affordable housing); Policy H5 (Threshold approach to applications); Policy H15 (Purpose-built student accommodation); Policy S4 (Play and recreation facilities); Policy E2 (Providing suitable business space); Policy E3 (Affordable workspace); Policy E4 (Land for industry, logistics and services to support London's economic function); Policy E9 (Retail, markets and hot food takeaways); Policy E11 (Skills and opportunities for all); Policy HC1 (Heritage conservation and growth); Policy HC5 (Supporting London's culture and creative industries); Policy HC6 (Supporting the night-time economy); Policy G1 (Green infrastructure); Policy G4 (Local green and open space); Policy G5 (Urban greening); Policy G6 (Biodiversity and access to nature); Policy G7 (Trees and woodlands); Policy SI1 (Improving air quality); Policy SI2 (Minimising greenhouse gas emissions); Policy SI3 (Energy infrastructure); Policy SI4 (Managing heat risk); Policy SI5 (Water infrastructure); Policy SI6 (Digital connectivity infrastructure); Policy SI7 (Reducing waste and supporting the circular economy); Policy SI8 (Waste capacity and net waste self-sufficiency); Policy SI12 (Flood risk management); Policy SI13 (Sustainable drainage); Policy SI16 (Waterways – use and enjoyment); Policy T1 (Strategic approach to transport); Policy T2 (Healthy Streets); Policy T3 (Transport capacity, connectivity and safeguarding); Policy T4 (Assessing and mitigating transport impacts); Policy T5 (Cycling); Policy T6 (Car parking); Policy T6.1 (Residential parking); Policy T6.2 (Office parking); Policy T6.3 (Retail parking); Policy T6.5 (Non-residential disabled persons parking); Policy T7 (Deliveries, servicing and construction); Policy T9 (Funding transport infrastructure through planning); Policy DF1 (Delivery of the Plan and Planning Obligations); Policy M1 (Monitoring).

9.3 **Havering Local Plan (2021):** Policy 1 (Romford Strategic Development Area); Policy 3 (Housing supply); Policy 4 (Affordable Housing); Policy 5 (Housing mix); Policy 7 (Residential design and amenity); Policy 12 (Healthy communities); Policy 14 (Eating and drinking); Policy 16 (Social Infrastructure); Policy 17 (Education); Policy 18 (Open space, sports and recreation); Policy 19 (Business Growth (protection of designated Locally Significant industrial Sites)); Policy 23 (Transport connections); Policy 24 (Parking provision and design); Policy 26 (Urban design); Policy 27 (Landscaping); Policy 29 (Green infrastructure); Policy 30 (Nature conservation); Policy 33 (Air quality); Policy 34 (Managing pollution); Policy 35 (On-site waste management); Policy 36 (Low carbon design, decentralised energy and renewable energy).

9.4 **Romford Area Action Plan 2008:** ROMSSA2 – Bridge Close.

10.0 Delivery Structure and Funding

10.1 This section sets out how the Scheme will be delivered and funded.

10.2 The Council established a joint venture development vehicle, Bridge Close Regeneration LLP ("BCR LLP") to bring forward the proposed regeneration of the Scheme (see the Order Land).

10.3 BCR LLP was until October 2020 jointly owned between the Council and the SPV. On 16th September 2020, Cabinet approved the proposed acquisition by the Council of the private sector interest in BCR LLP and on 29th October 2020, the Council entered into a purchase agreement to acquire the interest in BCR LLP that it did not already own from the SPV.

10.4 In light of the Council acquiring full control of BCR LLP, on 16th December 2020, Cabinet considered a number of recommendations relating to the future funding and delivery of the scheme. Approval was granted for the Council to deliver the regeneration of Bridge Close directly, funding the development entirely through Council resources, predominantly using the Housing Revenue Account. Cabinet approved a budget with referral to and subsequent agreement by Full Council on 3rd March 2021. Subsequently, the Bridge Close

Regeneration LLP Business Plan 2022/2023 was approved by Cabinet on 16th February 2022 and thereafter adopted by the Bridge Close Regeneration LLP.

10.5 In accordance with the Members' Agreement, BCR LLP were required to issue and agree a draft Business Plan to the Council as Member. The updated Business Plan was approved in February 2023. It included a review of key work streams underpinning the delivery of the Council's vision for Bridge Close and provides an update of the budget and financial model approved by Cabinet in December 2020 and recommends that the updated Business Plan be agreed, noting the significant benefits to the regeneration of Romford town centre, the contribution towards Havering's target for housing delivery, and the expected financial returns anticipated in the plan.

10.6 The Business Plan forms part of a comprehensive suite of project documents, including the Members' Agreement, the Land Agreement, the Land Acquisition Strategy, the Security Agreement and the Loan Note Instruments which, amongst others, set out the strategy and the terms and conditions for provision of funding by the Council as principal Member of the JV (noting that a wholly owned company of the Council acts as second member of the JV). The Business Plan is a suite of strategy and policy documents, including a budget and financial model with detailed forecasts, which provides a management framework for delivering the vision and objectives for the regeneration of Bridge Close. The Business Plan and associated budget for delivery of the Scheme is reviewed and updated on an annual basis. The latest Business Plan for the year 2025-2026 was approved by Cabinet and Full Council on 5th February 2025 and 26th February 2025, respectively.

10.7 As highlighted above, the proposed regeneration is an important policy priority for the Council. The Council has worked to ensure necessary funding, approvals and consents and all other matters required for delivery of the regeneration proposals are in place. As of 31st March 2025, in excess of £50 million has been invested in the scheme, including £36 million of site assembly costs. This investment has been funded by the Council entirely. Investment in site assembly and design development continues in accordance with the Business Plan.

10.8 Since establishment of BCR LLP, the development of proposals has been progressed by a multi-disciplinary team of professional advisors and technical consultants, working collaboratively across multiple, interrelated workstreams, including the masterplan, individual plot designs comprising residential and social infrastructure, as well as design and place-making of the wider public realm. A planning application was submitted on 29th November 2023, reflecting design development to RIBA Stage 2. Key members of the design and delivery team are set out as follows[6]:

- Project Management, Procurement, Employer's Agent, Clerk of Works (Atkins Realis)
- Masterplanning (Fletcher Priest Architects)
- Architectural Design (Allies & Morrison, MacCreanor Lavington Architects)
- Civil, structural, MEP engineering (Meinhardt)
- Technical Specialisms (Stantec, Gordon Ingram Associates, other specialists)
- Land Assembly & CPO (Ardent)
- Town Planning (Savills)
- Cost Planning (Gardiner & Theobald)
- Sales Advisory (Savills)
- Legal (Browne Jacobson LLP, Howard Kennedy LLP)

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10.9 A procurement strategy has been adopted for the procurement of a demolition and a main contractor based on a full open market tender using a two-stage procurement with novation of the design team to the contractor. The contracts will be awarded based on the most commercially advantageous terms and conditions.

10.10 As such, the Council, through BCR LLP, has assembled a comprehensive team with the requisite skills to manage the scheme and its related risks through design development to procurement of a main contractor and construction delivery. The Council has a fully capable resource to ensure delivery of the scheme.

10.11 The Scheme will be developed in a total of three phases in keeping with the timetable envisaged by the Business Plan. The current indicative programme for delivery of the three phases, with start on site expected in Quarter 2 of 2027, completion of Phase 1 is anticipated in the autumn of 2030 with phased delivery of the Scheme to completion early in 2035 in accordance with circumstances prevailing at the time.

10.12 The Council will continue to seek to acquire any outstanding interests in the Order Land through private treaty negotiations in accordance with the phasing strategy for the delivery of the Scheme and similarly will implement the Order (where required) if confirmed to allow the phasing and decant proposals to be achieved.

10.13 In order to provide certainty on the ability to deliver the Scheme and/or the Varied Scheme (which will include the delivery of new housing funded by the GLA and the flexibility to enable the reprovision of homes for all qualifying residents) the Council has included all land and rights required to deliver the Scheme within the Order now, including the land necessary for the relocation of the HICC and land required for the later sub phases the last of which is not expected to commence until Quarter 2 of 2031.

10.14 In relation to 222-226 South Street, HICC is advised by an experienced development team that includes NTR and John McAslan & Partners. Funding for the new facility will be provided by a combination of compulsory purchase compensation from the Council, HICC's own funds raised from its congregation and third-party funding (potentially including Sharia finance and other charitable donations). The in-principle agreement reached between HICC and the Council (which is in the process of being formally documented) requires HICC to submit a detailed funding plan.

10.15 **The Council's track history of success in regeneration**

10.16 Havering has an exciting regeneration agenda, to create even more places in the borough where people are proud to live and communities thrive.

10.17 Through its regeneration programmes, the Council is:

- Building modern, energy-efficient homes and well-connected neighbourhoods that are right for the borough;
- Providing new, high quality Council housing and increasing the amount of family-sized homes;
- Providing infrastructure to support new homes;
- Increasing opportunities for home ownership for Havering residents;
- Supporting healthy communities, fit for future generations;
- Supporting and investing in the local economy to create a thriving place; and
- Protecting and celebrating history and heritage.

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10.18 Two particular developments that are similar in nature to the Scheme and demonstrate the Council's track history of success in regeneration are Park Rise and the 12 Sites Regeneration Programme.

10.19 **Park Rise - Solar Serena Sunrise, Sunrise Avenue, Hornchurch**

10.19.1 The Park Rise scheme (formerly Solar Serena Sunrise) will create a high-quality older persons retirement village in the heart of Hornchurch, next to Harrow Lodge Park.

10.19.2 175 new properties will be provided for the over 55's, including new council rented homes, shared ownership homes and properties for sale.

10.19.3 The project is currently in its construction phase, with new homes to be available for local residents later in 2023.

10.20 **12 Sites Regeneration Programme**

10.20.1 The Council is working in partnership with Wates Residential in a joint venture to deliver over 3,500 much-needed new homes across 12 existing housing sites within the borough.

10.20.2 The programme focuses on delivering investment, new homes and 'designing out crime' on housing sites that need it most.

10.20.3 The Council's ambition is to leave a lasting legacy for local communities, supporting the vision that everyone deserves a great place to live.

10.20.4 The Council's 12 Sites programme will double the amount of affordable homes on these sites overall, council rented homes will increase by 70 per cent and just under 400 new shared ownership homes will be delivered, as well as new homes to buy.

10.20.5 Every Council tenant that moved from their home to enable the regeneration works is guaranteed the right to return to a brand new property.

11.0 The Use of the Enabling Powers

11.1 Sections 226(1)(a) and (3)(a) of the Town and Country Planning Act 1990 confer power on a local authority to acquire land compulsorily for development and other planning purposes within its area if it thinks that the acquisition will facilitate the carrying out of development, re-development or improvement on or in relation to that land.

11.2 The power to acquire land compulsorily conferred by Section 226(1)(a) of the 1990 Act is subject to subsection (1A), which provides that the acquiring authority must not exercise the power unless it believes that the development, re-development or improvement is likely to contribute to the achievement of any one or more of the following objectives:

- Promotion or improvement of the economic wellbeing of their area.
- Promotion or improvement of the social wellbeing of their area.
- Promotion or improvement of the environmental wellbeing of their area.

11.3 The Council considers the Scheme meets the tests within subsection (1A). Section [12.0] of this Statement describes the wellbeing benefits arising from implementation of the Scheme.

11.4 Mindful that it should not use a more general compulsory purchase power when a more specific one is available, the Council considers that the section 226(1)(a) power is the most

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appropriate one because the Order seeks to acquire Lands for mixed use purposes and that form part of a wider Scheme.

11.5 **Section 13 Local Government (Miscellaneous Provisions) Act 1976**

11.6 Section 13 of the Local Government (Miscellaneous Provisions) Act 1976, enables local authorities to create and purchase compulsorily new rights over land, where the acquisition of the land itself is not required and where such rights are not in existence when the compulsory purchase order is made.

11.7 In order to ensure delivery of the Order Land development, the Council is seeking to exercise these powers with new rights sought for: (i) crane oversailing, (ii) rights of access (iii) works to the highway and landscaping and (iv) for the purpose of erecting scaffolding and hoarding during the construction period.

11.8 The rights being sought are only required for a finite period during the construction phase. It is unlikely that the Council will be able to negotiate the acquisition of these rights with relevant third parties within the required timescale and they are necessary to deliver the development.

11.9 **Compliance with Ministry for Housing, Communities and Local Government Guidance (2019) Compulsory Purchase and the Crichel Down Rules**

11.10 The "CPO Guidance" assists acquiring authorities in England on the proper use of compulsory purchase powers.

11.11 Paragraph 1 of Tier 1 of the CPO Guidance states that:

“Compulsory purchase powers are an important tool to use as a means of assembling the land needed to help deliver social, environmental and economic change. Used properly, they can contribute towards effective and efficient urban and rural regeneration, essential infrastructure, the revitalisation of communities, and the promotion of business – leading to improvements in quality of life."

11.12 On confirmation of the Order, the Council intends to execute one or more General Vesting Declarations or serve a Notice (or Notices) to Treat, in order to secure unencumbered title of the Order Land facilitating regeneration of the area and bring about a step change in the community.

11.13 The CPO Guidance (Paragraph 2 of Tier 1) goes on to state that:

"Acquiring Authorities should use compulsory purchase powers where it is expedient to do so. However, a compulsory purchase order should only be made where there is a compelling case in the public interest."

11.14 The Council considers that there is a compelling case in the public interest for the exercise of its compulsory purchase powers to compulsorily acquire the Order Land (including 222-226 South Street) to implement the Scheme and the Council has demonstrated this throughout this statement

11.15 Paragraph 2 of the CPO Guidance continues to advise that an acquiring authority should ensure that the purposes for which it is making a compulsory purchase order sufficiently justify interfering with the human rights of those with an interest in the land affected. Human Rights considerations are set out in Section [14.0] of this Statement.

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11.16 Paragraph 6 of Tier 1 provides guidance that the Public Sector Equality Duty in section 149 of the Equality Act 2010 must be fulfilled. The Council (and the Secretary of State) must discharge the Public Sector Equality Duty when making (and confirming) a compulsory purchase order. Section [14.0] of this Statement on Human Rights and Equality provides further information on how the Council has done so throughout the process.

11.17 The CPO Guidance provides certain general policy requirements, which apply to all CPOs. From this general guidance the Council is required to have regard to the following when considering the making of a compulsory purchase order:

- How the land will be used and that the purposes for which the order is made sufficiently justify interfering with the human rights of those with an interest in the land affected.
- Whether the necessary resources are likely to be available to deliver the scheme within a reasonable timescale.
- The degree to which other bodies (including the private sector) have agreed to make financial contributions or to underwrite the scheme including the basis and timescales for such contributions or underwriting to be made; and
- Whether the scheme is likely to be blocked by other impediments to implementation.

11.18 The above points are addressed at sections [12.0-15.0] of this Statement, respectively

11.19 Particular guidance on Orders made by acquiring authorities under section 226 of the 1990 Act is provided in Section 1 of Tier 2 of the CPO Guidance. In particular, Paragraph 98 states that the powers in Section 226 can be used by local authorities as they are; *"…. intended to provide a positive tool to help acquiring authorities with planning powers to assemble land where this is necessary to implement proposals in their Local Plan or where strong planning justifications for the use of the power exist. It is expressed in wide terms and can therefore be used to assemble land for regeneration and other schemes where the range of activities or purposes proposed mean that no other single specific compulsory purchase power would be appropriate."*

11.20 Paragraph 100 (Tier 2, section 1) refers to section 226(1)(a) of the 1990 Act enabling acquiring authorities with planning powers to acquire land if they think that it will facilitate the carrying out of development, redevelopment or improvement on, or in relation to, the land being acquired, and it is not certain that they will be able to acquire it by agreement.

11.21 Paragraph 105 of the same section makes clear that the benefit to be derived from exercising the power is not restricted to the area subject to the compulsory purchase power, as the concept of wellbeing is applied to the whole (or any part) of the acquiring authority's area. Section [12.0] of this Statement includes information regarding the wellbeing benefits which will arise from the Scheme.

11.22 Paragraph 107 (Tier 2, section 1) sets out further information on the justification required to support an Order to acquire land compulsorily under section 226(1)(a) of the 1990 Act. This includes:

- Programme of land assembly to be set within a clear strategic framework [see Sections [2.0], [3.0] and [6.0] of this Statement]
- Such a framework needs to be founded on an appropriate evidence base and to have been subjected to consultation processes (see [Section 4.0]).
- The planning framework should be as detailed as possible in order to demonstrate that there are no planning or other impediments to the implementation of the scheme ([Sections 12.0-15.0]).
- Consideration of the NPPF as this is a material consideration in all planning decisions (Section [6.2]).

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11.23 Paragraph 108 (Tier 2, section 1) makes it clear that it is not always feasible or sensible to wait until the full details of the scheme have been worked up before proceeding with the order. In such cases the responsibility lies with the acquiring authority to put forward a compelling case for acquisition in advance of resolving all uncertainties. Section [5.0] sets out details of the planning application and explains the parameters for delivery of residential and non-residential floorspace within the Scheme. The Council considers that there is a compelling case to make the Order now, in order to secure delivery of the Scheme and/or the Varied Scheme and the associated wellbeing benefits set out in Section [12.0], in advance of the reserved matters being granted.

11.24 A compulsory purchase order to which there are objections will require confirmation by the Secretary of State to become effective. Paragraph 109, Tier 2 of the Guidance provides that any decision by the Secretary of State about whether to confirm an Order made under Section 226(1)(a) will be made on its own merit but the factors which the Secretary of State can be expected to consider include:

i. Whether the purpose for which the land is being acquired fits in with the adopted Local Plan for the area or, where no such up to date Local Plan exists, with the draft Local Plan and the NPPF.
ii. The extent to which the proposed purpose will contribute to the achievement of the promotion or improvement of the economic, social or environmental wellbeing of the area.
iii. Whether the purpose for which the acquiring authority is proposing to acquire the land could be achieved by any other means. This may include considering the appropriateness of any alternative proposals put forward by the owners of the land, or any other persons, for its reuse. It may also involve examining the suitability of any alternative locations for the purpose for which the land is being acquired.

11.25 The above points are addressed at sections [6.0, 12.0 and 15.0] respectively

11.26 Tier 2, section 21 of the Guidance is also relevant as it relates to the compulsory purchase of new rights including under the 1976 Act. Paragraph 266 sets out that there should be a description of relevant powers and purposes (which purposes may, as here, be the same purposes as those for the land to be acquired). These matters are addressed in Section [4.0] of this Statement.

11.27 The Council has followed the Guidance in making the Order. The Council is exercising the powers under section 226(1)(a) of the 1990 Act because the Scheme will facilitate the redevelopment of the area and will make a significant contribution to the improvement of the economic, social and environmental wellbeing of the Council's area, including residents of the Order Land. The exercise of the powers conferred by section 13 of the 1976 Act is also required to facilitate development of the Scheme and/or the Varied Scheme (as set out in Section [11.5] above). Further explanation as to the justification for the use of compulsory purchase powers is set out in the subsequent sections of this Statement.

12.0 The Purpose and Justification for the Use of Compulsory Purchase Powers

12.1 Through its policies, the Council has consistently recognised and promoted the need to regenerate Bridge Close, as summarised in [Section 2.0] of this Statement.

12.2 The section below sets out the purpose and justification of the use of compulsory purchase powers to facilitate the carrying out of development applying the tests set out in the CPO Guidance.

12.3 It explains how the regeneration of Bridge Close will improve the environmental, social and economic wellbeing of the Order Land and the surrounding area.

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12.4 The Council's case is that the use of compulsory purchase powers is necessary to acquire the Order Land (including the new rights) to facilitate the delivery of the Scheme and the Varied Scheme and that delivery of the development compellingly in the public interest.

12.5 The Council considers that the Order is fully justified. The resolution to make the Order accords entirely with the provisions in the CPO Guidance which encourages local authorities to exercise their compulsory purchase powers in such a way as to ensure that sites are brought forward for development.

12.6 Circular paragraph 109.1 (bullet point 1) of the CPO Guidance considers whether the purpose for which the land is being acquired fits with the adopted Local Plan for the area or where no such up to date plan Local Plan exists, with the draft Local Plan and NPPF. In this case, there is an adopted Local Plan and existing Site Allocation that signals the intention for comprehensive redevelopment of the site.

12.7 As set out in detail in [Section 6.0] above, the Scheme and Varied Scheme are in accordance with national, regional and local planning policies.

12.8 The need to regenerate this area has been consistently recognised by the Council for well over a decade, dating as far back as designation of the Order Land for residential development in the Local Development Framework 2008

12.9 London and the South East are experiencing significant development pressures and there is a need to increase the supply of housing to meet the demands of the growing population. The NPPF requires local planning authorities to identify and meet their full objectively assessed needs for housing.

12.10 Housing needs are recognised by the Government as being an unconstrained assessment of the number of homes required in an area to meet local needs. This assessment is required to be undertaken separately to a housing land availability assessment. As a result, the Government has published the Standard Method for assessing housing need, setting out the minimum number of homes expected to be planned for in each local authority area. The NPPF is clear that LPAs should follow this when preparing their emerging plans. The Standard Method figures identify that LBH has a housing requirement of 1,979 dwellings per annum (dpa), based on the latest population projections.

12.11 The London Borough of Havering forms part of the London-wide housing market area with all of the other London Boroughs. The Mayor of London, through the preparation of the 2021 London Plan sought to identify both the need for new housing and the potential supply across London. Table 4.1 of the London Plan (2021)identifies a need for a minimum of 522,870 new homes in London between 2019-2029 (or 52,287 new homes per annum). The London Plan sets out average annual minimum housing supply targets for each borough until 2029 The ten year housing target for London Borough of Havering within the London Plan (2021) is 12,850.

12.12 At a sub-regional level the London Borough of Havering forms part of the Outer North East London Housing Market Area with the London Boroughs of Barking and Dagenham and Redbridge. The Council has worked with these authorities to prepare a sub-regional SHMA. A subsequent update has been prepared for Havering taking into account updated GLA household projections. The 2023 SHMA Update for Havering indicates that Havering's full Objectively Assessed Need is for 31,081 new homes (of which 38% is for affordable housing) over the period, 2021-2043, or 1,554 homes per annum. Additionally, the Council's latest authority monitoring report (AMR) (2023-2024) states that LBH is unable to demonstrate 5 Year Housing Land Supply. The 2023-2024 AMR identifies that LBH is only able to demonstrate a housing land supply of 2.9 years (including 20% buffer).

12.13 Delivery of the Scheme or the Varied Scheme on the Order Land will make a significant contribution towards the Council attaining these housing targets.

12.14 Circular paragraph 109.1 (bullet point 2) of the Guidance considers the extent to which the proposed purpose will contribute to the achievement of the promotion or improvement of the economic, social or environmental wellbeing of the area.

12.15 The Scheme and the Varied Scheme will make a significant contribution to the achievement of the promotion or improvement of the economic, social or environmental wellbeing of the area, as set out in the following:

Economic

12.16 The Scheme and the Varied Scheme will make a significant contribution to tackling the economic issues facing the community in and around Bridge Close. This includes providing employment and training opportunities so that residents have access to more jobs locally, while also having the right skills to access jobs across London. The investment in Bridge Close in proximity to Romford centre will also deliver a significant boost to the local economy, benefiting existing and new businesses in the local area. As set out in the Employment and Skills Plan dated July 2023 and accompanying the associated planning application, Policy 22 of the Local Plan specifies the following employment and skills targets:

i. A minimum local labour target of 20% during construction for major commercial or mixed use developments including a proportion of apprenticeships where the length of construction phase allows;
ii. A minimum local labour target of 20% during construction for major residential developments;
iii. The notification of all vacancies associated with the development and its end use through the Council's employment service; and
iv. Offer opportunities to local businesses within their supply chains

12.17 Consequently, the proposed Scheme and Varied Scheme targets include:

i. 58 apprenticeships.
ii. 20% of the labour force comprised of local residents or businesses.
iii. 61 Havering residents securing work through the project.
iv. 306 jobs advertised through the Council's employment service.
v. 29 career events.
vi. 25 qualifications and certificates gained by residents of Havering.

12.18 The following positive wider economic impacts will arise due to the Scheme and the Varied Scheme:

i. The creation of a new sustainable residential neighbourhood with supportive social and physical infrastructure will act as catalyst for economic growth, with the economic multiplier effect impacting positively on the local community.
ii. The delivery of the Housing Zone objectives will also direct investment and development activity in the area.
iii. Positive changes to the Ring Road will reduce its barrier effect and create a new east-west link with high quality well-connected public realm.
iv. Access by public transport, walking and cycling from the west of Romford to the town centre and the station will be improved, thus integrating Bridge Close into the fabric of the town.

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v. The east-west link will provide a route between the growing residential areas to the west of the town through to a proposed southern entrance to Romford station.
vi. The development will support growth of the local economy during the construction period and also provide long-term additional spend in the local economy as new residents move into the area and use local shops, and spend money on local services. A number of direct and indirect jobs will also be supported during the construction period.
vii. A range of new commercial facilities will be provided as part of the scheme which will strengthen and diversify the retail and leisure offer within the town centre. Principally, the development will also provide a range of new flexible employment floor space which will deliver a significant number of new jobs and enhance the economy and employment offer for Romford (20% of which will be affordable in nature).

Social

12.19 The economic benefits noted above and the environmental benefits listed below will improve the social wellbeing of the Council's area by creating jobs and creating a new attractive environment within which to live. In addition to those benefits, the opportunities presented by the regeneration would create social benefits for local people and businesses in Bridge Close and the wider community and make a significant contribution towards the promotion and improvement to social wellbeing in the Council's areas. The following positive social impacts will arise due to the regeneration scheme:

12.20 The removal of secondary, basic quality commercial buildings from Romford Town Centre and replacement with a high-quality mixed-use development will create balanced, mixed and inclusive communities. This will directly result in the improved quality of life for the community including both existing and future residents.

12.21 The provision of an improved tenure mix of private and affordable housing units resulting in a mixed, balanced, community with its own identity in a well-designed space for living, working and leisure, thereby promoting social cohesion and wellbeing.

12.22 An increase in the overall quantum of housing to meet housing need. All of which are designed as Part M4(2) accessible, with 10% designed to M4(3), and are able to be adapted for people with different abilities.

12.23 The completion of the development will contribute towards the delivery of much needed well designed housing (including affordable housing) to the Borough that includes links to significant new transport infrastructure, public open space, improved connections for pedestrians and cyclists.

12.24 The comprehensive re-development of the Order Land (including all of the industrial units at Bridge Close, the Islamic Cultural Centre and the houses fronting Waterloo and Oldchurch Roads) will deliver significant urban design benefits, such as greater open space, a more positive southern gateway to the area, and a revitalised frontage along Waterloo Road. The Varied Scheme would retain the London Ambulance Station (LAS) in situ and the redesign of Phase 2 would ensure the LAS is able to function effectively alongside the development. A separate planning application will be submitted to enlarge the existing LAS car park to ensure there is no loss of car parking capacity and the access strategy will be amended to enable access to the LAS site to be retained.

12.25 The development will also provide a range of new community facilities, including a new primary school and community centre which will be well located and accessible for use by

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both existing and future residents. The new community centre will also be made available to the existing social infrastructure groups on site if required. In addition, the intention is to provide an improved facility for HICC at 222-226 South Street. There will be a reduction in the amount of community facilities that can be delivered by the Varied Scheme but the removal of LAS from the Order Land removes a potential impediment to delivery.

12.26 The development will provide for a safer local community where, as a result of the application of Secured By Design principles, buildings and the public realm within Bridge Close will provide a safe environment for local residents and the wider community to live, work and play. It is expected that the Scheme will have a material beneficial impact on the reduction of crime and anti-social behaviour currently experienced on Bridge Close.

Environmental

12.27 The Scheme and Varied Scheme have been designed to enhance the environmental wellbeing of the residents and other occupiers within the area and the Borough as a whole and tackle issues currently facing local residents. The following positive environmental impacts will arise due to the regeneration scheme:

i. All residential units built to comply with Part L of the Building Regulations.
ii. Improvements to pedestrian and cycle connections throughout the local area particularly with regard to accessing off-site leisure and recreation facilities.
iii. An increase in the quantity and quality of on-site amenity space and substantial improvements to the quality of existing open space.
iv. The development will provide a material net benefit in biodiversity through a significant amount of landscaping and planting of a range of species planted to encourage biodiversity.
v. Improvements to the overall townscape to provide clearly defined public realm and landscaped areas.
vi. Remediating and mitigating degraded, derelict, contaminated and unstable land, where appropriate, which will be one of the outcomes of the land acquisition strategy given the nature and existing uses of many of the target sites.
vii. Improvements to the River Rom corridor and provision of riparian habitat during operation / occupation that will have a permanent beneficial effect on the River Rom that is significant at the Local level.
viii. A new public route will be created along the river for use by pedestrians and cyclists and will include informal play and communal amenity space. The development has been designed to be predominantly car free, with a number of new footbath links through the site toward Romford Station and the town centre.
ix. A range of energy and sustainability measures following the GLA's energy hierarchy, including:
    - High specification building fabric.
    - Site-wide energy centre utilising air source heat pumps and photovoltaic panels. All domestic and non-domestic units connected to this system.
    - Delivery of domestic and non-domestic carbon savings beyond building regulation requirements with carbon offset contribution required to achieve net zero-carbon scheme.
    - EV charging points provided to 20% of car parking spaces with infrastructure for future connectivity.
    - Water efficiency measures meeting London Plan target.
    - Construction in accordance with Circular Economy principles to reduce unnecessary waste

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12.28 All of the above are considered to result in a significant improvement to the economic, social and environmental wellbeing of the area.

12.29 Circular paragraph 109.1 (bullet point 3) of the CPO Guidance considers whether the purpose for which the acquiring authority is proposing to acquire the land could be achieved by any other means.

12.30 The vision for the RDF and the Housing Zone is the transformation of a declining industrial area into a vibrant new residential community providing much needed new housing including affordable homes, as well as social, physical and green infrastructure with access to public transport and employment opportunities. The development will deliver up to 1,070 new homes, of which 35% will be affordable.

12.31 Within the Housing Zone there are some major sites that will be brought forward for development by house builders in accordance with the Housing Zone objectives. However, there are also sites, such as the Order Land, that require direct intervention from the Council as they are currently in fragmented ownership and cannot deliver the quality and scale of new housing (including affordable housing) required by the Masterplan and Planning Framework, without being assembled into larger comprehensive development sites which can be brought forward for development in a way which maximises the land's potential.

12.32 The Order Land is in multiple ownerships and, historically, attempts by the private sector to assemble the employment land at Bridge Close for development have failed. It is unlikely without the Council's intervention and the Housing Zone funding that a comprehensive scheme could be viably delivered.

12.33 If the CPO is not made, then the only way of acquiring the land and interests needed to deliver the development would be by agreement. Whilst it is recognised that implementation of a CPO is a matter of last resort, discussions to date have made it apparent that, unless the CPO is made and confirmed, it is unlikely that the Council, or a private developer, would be able to assemble the land and interests needed to bring forward a comprehensive housing development on the Order Land.

12.34 Without intervention the existing low value commercial land uses would remain in place and infrastructure would not be improved. It will also not be possible to facilitate comprehensive residential development and any residential development that might be brought forward is likely to be poor quality and piecemeal. It would fail to deliver the development outcomes and regeneration objectives planning policy envisages for the area and in particular the substantial levels of new affordable homes necessary to meet the objectives of the Housing Zone. The Order enables the Council to implement these wider objectives, including the infrastructure and amenity improvement.

Financial Viability

12.35 Circular paragraph 109.1 (bullet point 4) of the Guidance considers the financial viability of the scheme for which the land is being acquired.

12.36 The Order Land is brought forward in accordance with the Council's regeneration objectives, including the delivery of a comprehensive and sustainable development, providing much needed housing, including affordable housing, and social infrastructure. The objectives of the development of the Order Land are set out at paragraphs 2.3-2.5 above.

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12.37 The development of the Order Land is being taken forward by the Council with the benefit of expert advice from its appointed team of consultants in relation to planning, land assembly and the Scheme's (and Varied Scheme's) commercial viability as set out in paragraph 10.8 above.

12.38 There is firm financial commitment and provision in the Council's Capital Strategy to progress the development and completion of the scheme as anticipated in the BCR LLP Business Plan. The delivery of the development of the Order Land is funded through the Council's Capital Strategy and Programme and received approval by Full Council on 26th February 2025. The envelope is funded predominantly by borrowing through the Housing Revenue Account (HRA) with social infrastructure in the form of the primary school and health centre being funded through the Council's General Fund.

12.39 In turn, funding of the school is recovered in whole or substantial part from the Department of Education (DfE) under the Wave 14 Free Schools Capital Programme and allocated s106 contributions. The investment in the health centre, delivered in Phase 2 of the Scheme, is underpinned by and subject to, agreement of lease arrangements for an appropriate scope through the NHS North East London Integrated Care Board. Should the NHS need for the health centre fall away, the space in Phase 2 of the Scheme would be leased under commercial arrangements in accordance with the planning consent. In respect of the Varied Scheme, the health centre would not be delivered and a contribution in-lieu would be provided through a s106 contribution. As it is currently unclear how the health centre would be funded and run by the health authority. A contribution in-lieu would provide more certainty and the ability for the health authority to fund an existing health care centre in need of financial contributions.

12.40 As set out above, the GLA has committed to provide funding of affordable housing units through the Homes for Londoners Affordable Homes Programme 2021-2026 (as amended). The amount of GLA funding would be reduced in the Varied Scheme is progressed – however, the Varied Scheme is viable and deliverable even with the reduction in GLA funding

12.41 Viability is underpinned by provision of a funding envelope that is sufficient to deliver the entire development (of either the Scheme or Varied Scheme), taking into account all costs of development and financing, and is reviewed and approved by the Council on an annual basis.

12.42 The Council has undertaken extensive financial modelling of the proposed development based on comprehensive assumptions, including the cost of land assembly, development costs and sales revenues. Each of these inputs has been subject to close review and it has been determined, following professional advice, that the development of land within the Order Land is capable of achieving a positive return.

12.43 Whilst the returns on investment fall short of returns that might be expected in the private sector relying on third party bank finance, the project delivers value for money on key regeneration parameters such as the cost and quantum of affordable housing and wider sustainability indicators. It compares favourably on financial performance criteria such as affordability and payback when benchmarked against typical providers of affordable housing. As such, the project is also viable in regeneration terms for the Council and BCR LLP.

12.44 To ensure the deliverability of the Scheme and Varied Scheme, the development of land within the Order Land is to be taken forward by BCR LLP and the Council, utilising a dedicated multi-disciplinary project team of skilled and experienced external practitioners

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and contractors who have the experience and expertise to carry out the works, having regard to the mixed-use nature and specific parameters of the scheme.

12.45 As is usual with regeneration projects, it is anticipated that construction of the development's initial phase will act as a catalyst for value growth, which will enhance the values of later phases.

12.46 There is therefore no impediment to the Scheme's delivery (nor the Varied Scheme's delivery) in terms of its viability.

12.47 It should also be noted that, as the Council will be taking the regeneration forward (rather than a private developer), its financial strategy is as much focused on its wider benefits, such as the meeting of housing targets, the delivery of affordable housing and the economic benefits to Romford town centre as it is in delivering a positive financial return.

12.48 In 2018 the Council agreed to provide the funding required to finance the estimated CPO costs for all the Order Land. The funding commitment has been renewed regularly since then as part of the annual update of the BCR LLP Business Plan and financial model. See Section [-] of this Statement for full funding details.

12.49 In addition to this, in order to facilitate the delivery of housing on Bridge Close the GLA, as part of the Romford Housing Zone, have allocated funding to initiate acquisition of property, support business relocations, deliver an east-west link and support ecological improvements to the River Rom.

Summary

12.50 The overarching principle is that the Council, in seeking to exercise powers of compulsory acquisition, are able to demonstrate a compelling case in the public interest for the exercise of those powers. Evidence is also required to demonstrate that there is no impediment to enable the delivery of the development the proposed acquisition is intended to facilitate. These matters have been addressed above but, in summary:

- A hybrid planning application has been submitted for the development, setting out proposals for a residential lead, mixed-use development in accordance with the Council's vision and regeneration objectives The Council's Strategic Planning Committee resolved to grant planning permission for the application on 28th August 2025, subject to the final direction from the Mayor of London and the completion of a Section 106 Agreement. Following the grant of planning permission, which is expected in December 2025, it is proposed to submit a Section 96a application and a Section 73 application to vary the planning permission in order to retain the LAS in situ. These applications are expected to be approved by is September 2026. The variations to the planning permission would result in a loss of residential units, loss of affordable residential units, loss of flexible health centre / commercial floorspace, loss of public open space and would require a redesign of Phase 2 of the scheme.
- Financial and physical resources are available to acquire the land and to deliver the regeneration scheme. The Council is operating with expert advice, governance, funding and development phasing already in place (paragraphs 8 to 8.14 above).
- The scheme and Varied Scheme are grounded in a "clear strategic framework" and "planning framework", being the Romford Town Centre Development Framework (RDF) (paragraphs 4.18 to 4.6 above).
- The regeneration of Bridge Close is a key deliverable for the Council as set out in the Submitted Local Plan, (paragraphs 6.8 to 6.13 above). Both the Scheme and Varied Scheme will deliver the comprehensive development of the Order Land and will be of a scale that can make meaningful contributions towards social infrastructure.

- Negotiations have been undertaken with landowners and occupiers and businesses and residential relocation strategies are in place (section [15.6] below). To date, 48% of the Order Land has been acquired by negotiation.
- Through delivery of a regeneration scheme the housing stock will be significantly improved with an increased supply of Affordable Housing located in the administrative area of the borough (Section 3.0 above).
- Construction phases of the development will include training and employment opportunities for residents within the borough and contribute to social infrastructure. Further socio-economic benefits accrue to the local community by virtue of significant increase in local spend not only related to construction procurement but as a result of facilitating new business development and job creation on site.
- An in-principal agreement has been reached with HICC in relation to its relocation to 222-226 South Street. The LPA has confirmed that HICC's proposed use of the site is acceptable in principle, subject to detailed design. HICC's relocation and the development of 222-226 South Street will be funded through a combination of compensation from the Council, its own resources and third-party finance. As part of its agreement with the Council, HICC will provide a detailed funding plan.

13.0 Views expressed by Government Departments or Mayor of London on the scheme underlying the CPO

13.1 The regeneration scheme benefits from support from the Greater London Authority ('GLA') and the Department for Education ('DfE').

13.2 As set out in paragraph 1.5 above and throughout this document, the Mayor of London has confirmed support for the regeneration through the approval of the bid for Housing Zone status, allocating funding for interventions specified in these zones for the purposes of unlocking or accelerating the delivery of housing, including within the Order Land[7]. Support was subsequently provided through entering into a Borough Intervention Agreement under which the GLA provided financial support for the acquisition by the Council of 214 shared ownership housing units[8].

13.3 In March 2021, the GLA approved the reprofiling of the grant already committed through to support the Council in the buy-out of their JV partner, land assembly and other related costs to facilitate the development[9]. A Grant Agreement (Local Authority) in relation to the Homes for Londoners: Affordable Homes Programme 2021-2026 was entered into in January 2023 against which funding may be drawn in accordance with provisions in the agreement. Ongoing discussions with the GLA include provision for grant funding as part of the future Homes for Londoners: Affordable Homes Programme.

13.4 The DfE is supporting the regeneration of Bridge Close through the Wave 14 Free Schools Capital Programme in support of the delivery of the Unity Romford Primary School[10]. Engagement has taken place and continues in accordance with DfE governance arrangements. A business case has been submitted in for review and feasibility study is expected in the fourth quarter of 2025.

14.0 Human Rights and Equality

Human Rights Considerations

[7] Romford was designated Housing Zone Status by the GLA decision MD1632 on 17th March 2016.
[8] The GLA made the decision, DD2215, to enter into a contractual commitment on 28th February 2018.
[9] GLA decision DD2507 of 4th March 2021.
[10] DfE announcement on 4th February 2020.

14.1 The Human Rights Act 1998 ("the Act") incorporated into domestic law the European Convention on Human Rights ("the ECHR"). The ECHR includes provisions in the form of Articles, which aim to protect the rights of the individual.

14.2 Section 6 of the Human Rights Act 1998 prohibits public authorities from acting in a way, which is incompatible with rights protected by the ECHR.

14.3 As is clear from the CPO Guidance, a compulsory purchase order should only be made where there is a "compelling case in the public interest", and that a public authority pursuing a compulsory purchase order should be sure that the purposes for which it is making that order sufficiently justify interfering with the human rights of those with an interest in the land affected. In making this assessment, the authority should have regard, in particular, to the provisions of Article 1 of the First Protocol and Articles 6 and 8 to the ECHR. Article 14 of the Convention (prohibition of discrimination) is also relevant.

14.4 **Article 1 of the First Protocol of the ECHR** states: that "every natural or legal person is entitled to peaceful enjoyment of his possessions" and that "no one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by the law and by the general principles of international law….".

14.5 Whilst the owners of the land comprised in the Order Land would be deprived of their property if the Order is confirmed and thereafter implemented, this will be done in accordance with the law. The public benefits associated with the Order are set out in this Statement, and the Council considers that the Order strikes a fair balance between the public interest in seeing the regeneration proceed (which is unlikely to happen in the absence of the Order), and the private rights which will be affected by the Order.

14.6 In this case, despite efforts being made, the Council has not been able to secure agreements with all of the owners of the Order Land nor has it been possible to locate the owners of the land in "unknown" ownership. Such parties will be entitled to compensation calculated under the CPO Compensation Code in respect of land acquired by the Council pursuant to the Order through the Upper Tribunal (Lands Chamber).

14.7 **Article 6 of the ECHR** provides that: "in determining his civil rights and obligations ….everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law". The Article 6 rights are met by the procedures for objection and confirmation, the right to bring a legal challenge in the High Court under the Acquisition of Land Act 1981 and the right to have any claim for compensation determined by the Upper Tribunal.

14.8 The regeneration of the Order Land has been comprehensively consulted upon. There has been an opportunity to make representations regarding the planning policies that promote development of the Order Land. The Council has further entered into extensive discussions and negotiations with the affected landowners regarding the future of the area and the regeneration proposals.

14.9 Where parties object to the Order, the Secretary of State for the Ministry for Housing, Communities and Local Government shall arrange either for written representations, or, as is more likely, for a public hearing or local inquiry to be held to provide those parties with an opportunity to be heard. Should the Order be confirmed, a person aggrieved may challenge the order in the High Court if they consider that there are sufficient grounds for doing so. In relation to compensation disputes, affected persons have the right to apply to the Upper Tribunal, an independent judicial body. It is considered that this process is compliant with Article 6.

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14.10 **Article 8 of the ECHR** provides that: "everyone has the right to respect for his private and family life, his home and his correspondence" and that "there shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of…. the economic wellbeing of the country…"

14.11 If the Secretary of State confirms the Order, the compulsory acquisition of the interests in the Order Schedule will be necessary only if these have not already been acquired by agreement within the timescales required to deliver the next phase of the Scheme. As explained in Section 15.13 below, efforts to acquire the relevant interests are ongoing. Further, all those whose interests are compulsorily acquired will be entitled to fair compensation, such compensation to be determined independently by the Upper Tribunal (Lands Chamber), if it cannot be agreed.

14.12 Whilst there may be some interference with the rights of the owners of the land comprised in the Order, this will be done in accordance with the law. The Council is therefore of the view that there is a compelling case in the public interest for the compulsory acquisition of each and every parcel of land comprised in the Order Schedule. It is also satisfied that that the public interest that is to be served by the development and the wider social, environmental and economic benefits to be realised as a result of the regeneration proposals outweigh the necessary interference with the private rights and interests that exist in the Order Land. The Council therefore, considers that the benefits associated with the Scheme as set out in this report, strike a fair balance between the public interest in seeing the development proceed (which is unlikely to happen in the absence of the Order), and the private rights which will be affected by the Order.

14.13 In light of the above, the Council is of the view that there is a clear and compelling case in the public interest for the compulsory acquisition of each and every parcel of land and the rights comprised in the Order Schedule. It considers that the public interest that is to be served by the Scheme and the wider social, environmental and economic benefits to be realised as a result of the Scheme outweigh the necessary interference with the private rights and interests that exist in the Order Land. Appropriate compensation will be available to those entitled to claim it under the relevant statutory provisions. The Council, therefore, believes that in making the Order it has struck a fair and proportionate balance between the interests of those whose rights under the ECHR will be affected and the wider public interest.

Equality Considerations

14.14 The public sector Equality Duty came into force on 5 April 2011.

14.15 The public sector equality duty under section 149 of the Equality Act 2010 ("PSED") requires the Council in exercising their compulsory purchase and related powers as acquiring authority 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; and (ii) the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it and foster good relations between the same. "Protected characteristics" are gender, race and disability, sexual orientation, age, religion or belief, pregnancy and maternity and gender reassignment.

14.16 The Council considers that it has given due consideration to the provisions of the Equalities Act 2010 and in particular its equality duty under Section 149 of the Act. Public Sector Equality Duty has been considered at each stage of the key decision-making for the Scheme. The Council undertook an initial Equalities Impact Assessment dated September

2019 and additional Equalities Impact Assessment dated March 2023 and October 2025 pursuant to the Equality Act 2010 (Specific Duties) Regulations 2011, which came into force on 10 September 2011.

14.17 The Equalities Impact Assessment summarised that, generally, the redevelopment of the site improves the area over the existing situation, including improving housing quality, urban realm, security, access to jobs, and education provision, all of which may mitigate against potential differential impacts on a number of protected characteristic groups.

14.18 Overall, the assessment indicated that due regard has been taken when considering design principles, and that measures have been included to mitigate against potential differential impacts which may be experienced by some protected characteristic groups.

14.19 The assessment report provided an overall list of final recommendations. Those recommendations are set out below.

i. **Design Principles**. Ensure that at the detailed design stage due consideration is given to all protected characteristics, and that the principles of good design are followed.

Principles of good and inclusive design showing due regard for protected characteristics has- and continues to inform detailed design development in accordance with the Council's public sector equality duty under the Equality Act 2010. These principles are enshrined in the Design and Access Statement (DAS) and the Design Code vision governing the design of future phases of the development.

Bridge Close Romford will be designed as inclusively as possible so that it can be comfortably and independently used by residents, staff, people visiting the development and the wider community regardless their age, ability or gender. The proposed development has been designed with consideration and understanding of the principles of inclusive design. The development therefore has been designed to meet the guidance of Approved Document M (Building Regulations 2010), and follow the principles of inclusive design defined by the Commission for Architecture and the Built Environment as:

- Places people at the heart of the design process;
- Acknowledges diversity and difference;
- Offers choice where a single design solution cannot accommodate all users;
- Provides for flexibility in use; and
- Provides buildings and environments that are convenient and enjoyable to use for everyone.

ii. **Consultation**. This has been shown to be vitally important to the success or otherwise of other schemes throughout the country. This includes targeted consultation / engagement before the proposal is finalised, and ongoing monitoring and evaluation throughout the development and operational phases of the scheme. The October 2022 consultation substantially improved its contact with all Protected Characteristic Groups ("PCGs") and in future engagement, the views of all nine protected characteristic groups should continue to be considered. Care should also be taken when liaising with disability groups that all disabilities are represented, not just physical mobility.

Consultation events will continue to consider PCGs and build on the experience of previous events to enhance and improve the reaching of as many PCGs as possible.

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Considered use of dedicated forums on social media and other appropriate means of contact may facilitate the inclusion and participation of a broader scope of PCGs.

iii. A detailed **Signage and Wayfinding Strategy**. Whilst it is stated that 'legible and obvious' routes will be provided there is no detail on this as yet. It is proposed that this would form part of the detailed design phase. This should include input from an equality perspective as well as an aesthetic and contextual one. Consideration should be given to the use of pictograms, colour coding and different materials/textures alongside written words.

Principles of good and inclusive design showing due regard for protected characteristics will continue to inform detailed design development in accordance with the Council's public sector equality duty under the Equality Act 2010. These principles are enshrined in the Design and Access Statement (DAS) and the Design Code vision governing the design of future phases of the development.

iv. **Segregated footway / cycleway** provision. Investigate ways to segregate cycles from pedestrians on the new bridge, on Bridge Close and in Neighbourhood Streets and Civic Square to enhance safety of everyone, and particularly the protected characteristic groups who are more likely to be walkers, specifically those with vulnerabilities such as the visually impaired, the hearing impaired and the ambulant impaired, who may chose not to go out at all in shared space areas due to safety concerns.

The approach with a shared route through the main public space has been reviewed during pre-application with Local Planning Authority Highway and Design Officers. A shared route through this area is preferred in order to reduce cyclists speed and reduce conflict with pedestrians, particularly given the gradient of the ramp. The considered use of appropriate signage and tactile surface materials to aid in the safe use of the bridge for the hard of hearing and visually impaired to provide will form part of the development of detailed designs.

v. **Signalised Pedestrian Crossings**. Give consideration to enhancing the safety of crossing points by providing signals with push button units (with rotating cones for the deaf/blind) or zebra crossings to change the priority from road traffic to pedestrians.

The use of means for safeguarding and facilitating movement for all members of the community will be undertaken at the detailed design stage.

vi. Provision of a **lift at New Bridge**. Space for the provision of a lift to connect Rom Bridge Place with the New Bridge should be safeguarded and the level of pedestrian traffic at the New Bridge monitored, with a view to incorporating the lift at a later date if deemed necessary.

The use of the pedestrian and cycle ramp and bridge forming the east-west connection across the site will be monitored in the context of safeguarding and facilitating movement for all members of the community and providing an inclusive design. Options for providing space and locating a lift by the new bridge will be undertaken at the detailed design stage.

vii. Materials / colour palette review. As with the signage and wayfinding, a detailed review of surface materials, textures, colours and tones of all elements of the scheme is proposed. The Design Code stresses the considerations for materials should be supply, durability, longevity and ease of replacement or replication. The review should also be undertaken from an equality perspective to ensure the visually impaired and

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those with cognitive disabilities such as dementia or autism, are not disorientated. Of particular note, consideration should be given to the provision of upstand kerbs, not less than 60mm, to protect blind and visually impaired people from straying into the road. Equally, colours and tonal differences should be reviewed, particularly including tactile paving, to ensure tonal differences to assist the visually and auditory impaired.

The use of materials across the site are set out in the Landscape Design and Access Statement. A detailed review of surface materials, textures, colours and tones of all elements of the scheme will be undertaken at the detailed design stage to use all means for safeguarding and facilitating movement for all members of the community.

viii. Street Furniture review. Proposals state that consideration will be given to ensure open and communal spaces do not have street furniture that will create trip hazards. No further information on layout is available at this stage. A street furniture review should be undertaken from an equality perspective at the detailed design stage.

A street furniture review will be undertaken from an equality perspective at the detailed design stage.

ix. Toilets. Consider providing toilet facilities or instigating a community toilet scheme with local businesses or retail outlets.

x. Finally, due consideration should be given to the impacts on protected characteristic groups during the construction phase, where temporary disruption may differentially impact on PCGs. It is recommended that an Equalities review is undertaken on any Construction Management Plan, or similar.

An update to the Equality Impact Assessment will be undertaken during procurement of demolition and main contractors and leading up to the appointment, including the review of any Construction Management Plan proposed.

14.20 As such, designs have been and continue to be reviewed, taking into account potential adverse impacts on members of the community with shared characteristics, and the means of mitigating the impact.

14.21 Further initiatives have been progressed pursuant to the Council's consultation and engagement with local owners and occupiers in accordance with the Relocation Strategy (for further details see section 15.0) and related Action Plan, which sets out how to treat existing tenants and relates to the Relocation Strategy.

Equalities and Human Rights Summary

14.22 The Council has proactively negotiated with interested parties from inception and continues to do so and is only employing the use of a CPO as a last resort.

14.23 The Council is committed to improving the quality of life and wider participation for all in the economic, educational, cultural, social and community life of the Borough. The development will provide a much needed mix of affordable and private sale properties. The new mixed tenure housing will improve the community cohesion in the area. It will provide increased choice and opportunity for Havering residents. This supports the overall aim of the Council's Equalities Policy and the Council's duties under the Equalities Act 2010.

14.24 At present the Order Land does not reflect a mixed and balanced community, with a heavy bias towards commercial and inappropriate mainly private tenanted housing stock. The

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development proposals seek to address this imbalance through the delivery of a range of residential tenures across the site e.g. private housing, a new range of intermediate housing, wider range of unit sizes across all tenures and 10% of all residential units meeting Wheelchair standards.

14.25 All landowners, commercial and residential occupiers who are located within the CPO Red Line Plan area will be affected by the implementation of the Compulsory Purchase Order. The Council will continue to endeavour to reduce this effect by extensive consultation and through the relocation strategies, see section 15.0 below. Consultation has and will continue to be undertaken with the commercial and residential owners and wider community to ensure that the development reflects local and Borough needs.

14.26 Having had due regard to its duty under the Equality Act 2010, the Council is confident that the delivery of the development will contribute towards improvement of the social, economic, educational and cultural improvements for existing and future residents.

15.0 Efforts to Acquire and Relocation Strategy

15.1 Paragraph 2 of the CPO Guidance states that:

"2.1 Acquiring authorities should use compulsory purchase powers where it is expedient to do so and where there is a compelling case in the public interest to make a compulsory purchase order..

2.2 The confirming authority will expect the acquiring authority to demonstrate that they have taken reasonable steps to:

- *understand the impact of the exercise of the compulsory purchase powers included in the compulsory purchase order and the acquisition of a person's interest in the land on those persons, for example affected owners and occupiers, through direct engagement with those parties*

- *attempt the acquisition of all of the land and rights included in the compulsory purchase order by agreement*

…

2.7 Where acquiring authorities secure the acquisition of land by agreement, they may pay compensation as if it had been compulsorily purchased, unless the land was already on offer on the open market

2.8 Compulsory purchase is intended as a last resort to secure the assembly of all the land needed for the implementation of projects. However, an acquiring authority does not need to wait for negotiations with affected parties to break down or for the affected parties to begin to engage with them before starting the compulsory purchase process in parallel with negotiations. Delaying the start of the compulsory purchase process can result in valuable time in progressing a project being lost. Therefore, depending on when the land and/or rights are required, it may often be sensible, given the amount of time required to complete the compulsory purchase process, for the acquiring authority to:

- *plan a compulsory purchase timetable as a contingency measure*

- *initiate formal procedures*

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2.9 This will also help to make the seriousness of the acquiring authority's intentions clear from the outset, which in turn can encourage those whose land is affected to enter more readily into meaningful engagement. In starting these procedures, the acquiring authority should make it clear that it is willing to continue to engage with affected parties to purchase land by agreement."

15.2 In compliance with Paragraph 2, the Council and its previous private sector development partner have been actively negotiating with owners since 2016 to acquire all interests in the Order Land, set out in the schedule of interests in the CPO. In addition, Ardent has been appointed by the Council to value and actively negotiate with all affected parties with a view to acquiring their interests by agreement wherever possible including possible options for the relocation of business interests.

15.3 Ardent has met with as many of the landowners as possible and undertaken inspections in order to provide the Council with accurate valuations for each property to establish potential acquisition costs and to enable offers to be made. Contact has also been made with occupiers to understand their requirements in terms of relocation premises and to identify any specific issues that will need to be addressed as a result of properties being acquired. The Council has employed a firm of local commercial property agents, Mass & Co., to assist business occupiers identify and secure new premises.

15.4 In engaging with property owners, the Council has also taken account of Paragraph 17 of the Guidance:

"17.1 Undertaking negotiations and engagement prior to, and in parallel with, preparing and making a compulsory purchase order can help build good working relationships with those whose interests are affected. Acquiring authorities should be open and honest with those whose interests are affected and treat their concerns with respect. This includes statutory undertakers and similar bodies as well as private individuals and businesses. Early communication with those whose interests are affected in the preparation of a compulsory purchase order will assist the acquiring authority understand more about:

(a) the land and rights it seeks to acquire

(b) the impact of the exercise of the compulsory purchase powers included in the compulsory purchase order on those whose interests are affected

(c) the amount of compensation which may be payable to those with an interest in the land if the compulsory purchase powers were to be exercised

(d) any physical or legal impediments to development that may exist

15.5 In consideration of the Guidance, the Council has taken the following steps:

- All freehold landowners have been contacted and at least one offer has been made for all freehold property interests. A flexible approach has been adopted to the offers, so that property owners have the choice of an immediate purchase, a subject to contract purchase, or an option agreement.

- Where agreement on values cannot be reached, landowners have been offered the option of an Independent Valuation process as a form of Alternative Dispute Resolution.

- All tenants and other occupiers have been contacted so that the impact of the CPO and their relocation requirements can be discussed. Tenants and occupiers have been

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offered option agreements which provide them with 'not before dates' for acquisition and set out the basis on which compensation will be paid.

- Relocation pro-forma allowing the full details of relocation requirements to be set out have been provided to occupiers, for return to the Council.
- An acquisition strategy has been prepared and is being implemented.
- A business relocation strategy has been prepared and is being implemented.
- Where business owners are nearing retirement and would qualify for the payment of compensation on the basis of the value of their business, the Council has made equivalent payments by agreement where this has been the business owner's preference.
- A programme has been put in place to deal with the relocation and compensation of residential tenant occupiers.
- Offers to pay reasonably incurred professional fees have been made to landowners and occupiers.

15.6 **Existing ownership within the Scheme**

Council Ownership

15.7 The Council owns approximately 41% of freehold and long leasehold interests in the Order Land (65% by area). When allowing for public land or unregistered land which will automatically transfer to the Council, the ownership interest increases to approximately 79% (70% by area).

Third Party Ownership

15.8 There are 11 commercial freehold and 2 commercial long leasehold interests in 3rd party ownership in the Order Land.

15.9 There are 5 residential freehold interests in 3rd party ownership in the Order Land.

Negotiations

15.10 The Council have sought to acquire all of the required interests within the Order Land by agreement, as summarised in the following paragraphs.

15.11 As would be expected for a scheme of this size, there remain a number of interests where it is expected that compulsory purchase powers will need to be exercised either because reasonable terms cannot be agreed for private treaty acquisition or because it has been difficult to make contact with the owner or occupier.

15.12 As required by best practice, the Council will continue to seek to acquire the outstanding interests within the Order Land by agreement. However, the Council considers that it is highly unlikely that it will be able to achieve the assembly of the entirety of the Order Land by agreement within a reasonable timescale without the use of compulsory purchase powers.

15.13 **Efforts to acquire commercial interests**

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15.14 The Council has engaged with all commercial owners and continues to seek to acquire commercial property interests through private treaty. As a result, and in accordance with the Guidance, a number of commercial properties have been acquired by the Council, either directly or through Bridge Close Regeneration LLP as set out below:

- Bridge House (1 Bridge Close)
- 2 Bridge Close
- 3 Bridge Close
- 4 Bridge Close (freehold only)
- 6 Bridge Close
- 8 Bridge Close
- 10 Bridge Close
- 12 Bridge Close (freehold only)
- 12a-c Bridge Close
- 12c-e Bridge Close
- 13 Bridge Close
- 13A Bridge Close

15.15 In relation to the acquisitions of 12a-c and 12c-e, three businesses have relocated. On acquisition of these properties, flexible leases were granted to the former owners in order to mitigate any adverse impacts of the transition and safeguard business continuity while fit-out works and repairs were being carried out on relocation properties.

15.16 A number of commercial property interests remain to be acquired. The following provides a status summary for each of the commercial interests within the Order Land where discussions and engagement are ongoing:

1 Bridge Close

15.17 Discussions to acquire the freehold interest by agreement commenced in September 2018. Offers inclusive of statutory loss payments have been made on three occasions. The primary issue that has prevented acquisition is the owner advancing a development value argument, which the Council has resisted on the basis that piecemeal development of small individual properties at Bridge Close is unacceptable in planning terms. The owner's approach therefore leads to an inflated land value. Although negotiations reached an impasse in 2019-2020, in July 2022, discussions re-commenced with the owner confirming that, although their development value argument remains, they were willing to discuss values on an existing use basis.

4 Bridge Close

15.18 Discussions to acquire the long leasehold interest (999 years) by agreement commenced in February 2018. Offers inclusive of loss payments have been made on two occasions. The failure to agree terms results primarily from the landowner's contention that they are unable to identify a suitable relocation property. While efforts have been made to progress negotiations on value, the owner has preferred not to engage until a relocation property has been sourced.

5 Bridge Close

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15.19 Discussions to acquire the freehold interest by agreement commenced in May 2018. An offer inclusive of loss payments was made in May 2019. Issues preventing acquisition have included difficulties sourcing a suitable relocation property, as well as the owner requiring the Council to accept responsibility for the cost of consolidating their site at Bridge Close with another site located approximately 2 miles away, which is not impacted by the proposed CPO. This has been resisted on the basis that, were a CPO to be confirmed, the owner would only be able to claim compensation for his property at Bridge Close and could not claim compensation to relocate a second site not affected by the CPO. While efforts have been made to progress negotiations on value, the owner has preferred not to engage until a relocation property has been sourced.

7 Bridge Close

15.20 Discussions to acquire the freehold interest by agreement commenced in September 2018. An offer inclusive of loss payments was made in December 2019. The failure to agree terms results primarily from the landowner's contention that they are unable to identify a suitable relocation property. While efforts have been made to progress negotiations on value, the owner has preferred not to engage until a relocation property has been sourced.

11 Bridge Close

15.21 Discussions to acquire the freehold interest by agreement commenced in June 2018. Offers inclusive of loss payments have been made on three occasions. Issues preventing agreement and acquisition relate to a difference in opinion of value in relation to the property and occupying business.

12 Bridge Close

15.22 Terms to acquire the long-leasehold interest, but subject to the grant of planning permission by a certain date, were agreed between the owner and the Council's former JV partner in 2016. The agreement was novated to BCR LLP on its establishment. The long-stop for satisfaction of the planning condition expired in March 2020 and the agreement was formally terminated in December 2024. Two offers in accordance with Guidance have since been advanced without agreement.

14 Bridge Close

15.23 Discussions to acquire the freehold interest by agreement commenced in May 2018. Offers inclusive of loss payments have been made on three occasions. A suitable relocation property was acquired in August 2025 therefore the only remaining issue preventing acquisition is a difference in opinions on value.

Ambulance Station, Old Church Road

15.24 The site is owned and occupied by the LAS. The planning permission (and therefore the Scheme) requires acquisition of the LAS site. The Varied Scheme retains the existing LAS building onsite during the implementation of Phase 1 and only requires a sliver of the site comprising approximately [303] sqm of hardstanding to the north. The sliver is required to facilitate the delivery of the school and an emergency fire access route to the rear of the new school.

15.25 The sliver is presently used to park around 10 ambulance vehicles and there is a roller shutter door to the rear that, following the acquisition, will no longer be usable as a secondary access/egress for vehicles. To ensure the existing operational effectiveness of LAS is maintained prior to the acquisition of the sliver, properties next to the LAS site have

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been acquired and clear land will be made available to LAS in perpetuity to ensure the spaces lost are re-provided. Further, appropriate arrangements are in place to ensure meanwhile car parking is provided during construction of the replacement parking facility.

15.26 Access to and egress from the LAS building will remain substantially unaffected by the varied scheme and any potential issues have been mitigated.

15.27 Since 2016 the Council have made efforts to acquire the entire freehold interest of the LAS site. Despite LAS and the Council working closely together to identify potential relocation properties, a whole site acquisition and relocation to a replacement site has not proved possible, primarily owing to LAS funding and resourcing constraints.

15.28 The Council recognises the importance of the services provided by LAS to the local community and has confirmed its commitment to ensure that with the acquisition of the sliver, the existing operational effectiveness of LAS is maintained in perpetuity.

15.29 The submission of the s96a and s73 applications following the grant of planning permission and their subsequent approval by the Council thereafter, will therefore enable the LAS to be retained in situ, negating the requirement for relocation. This Varied Scheme will mitigate and avoid a key impediment to the delivery of the regeneration scheme but would result in a reduction in housing quantum and community facilities delivered.

9 Bridge Close / 91 Waterloo Road

15.30 Discussions have been held with HICC since 2016 with a view to securing a relocation solution that meets with HICC's requirements. These discussions have included consideration of both on and off-site options, although both the Acquiring Authority and HICC now agree that an on-site relocation is unworkable within the context of the granted planning permission. An alternative site within Romford Town Centre, 222-226 South Street, which HICC has confirmed as acceptable to HICC, has been identified and the Council has been working with HICC to acquire this site by agreement. However, agreeing the terms of a negotiated private treaty purchase has, to date, not been possible and so 222-226 South Street has been included within the red line boundary of the CPO in the event an acquisition cannot be agreed through negotiation, and the Council has to acquire the site compulsorily as a final resort. The Council has also agreed to fund a planning application for HICC's new building, consistent with its obligation to pay statutory compensation for the equivalent reinstatement of HICC's existing premises. HICC has had two pre-application meeting with the Local Planning Authority ('LPA',) and submitted its development proposals to a Quality Review Panel ('QRP') in September 2025. The application was considered by the Strategic Planning Committee on 13 November 2025. It is envisaged that a planning application will be submitted imminently. Both the LPA and QRP have confirmed that they welcome the delivery of a new facility for HICC in Romford Town Centre.

15.31 The Council is also looking to enter into a relocation agreement with HICC. Solicitors were instructed to draft and settle the agreement in July 2025, and on 6 November 2025, HICC and the Council met, with their solicitors and surveyors in attendance, with a view to agreeing the last outstanding points of principle to be agreed. Completion of the agreement is expected to be achieved in the early part of Q1 2026. The parties are also in discussions over compensation and the arrangements for HICC to fund any shortfall between its compensation and the cost of re-providing a new facility. These arrangements will be recorded in a Funding Method Statement pursuant to the terms of the agreement between the parties.

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15.32 HICC will only be required to move from the majority of its existing premises when the final phase of the Scheme is implemented and the Council and Ardent is working with HICC in an attempt to ensure that the service it provides to the local community will not be interrupted.

15.33 The Council is also in dialogue with other faith groups at Bridge Close, although these groups generally only occupy under short term leases/licences/tenancies at will and have temporary or lapsed planning permissions for their use. The Council is nonetheless working with them and providing assistance aimed at helping them successfully relocate.

222-226 South Street

15.34 Discussions with the freehold owner of 222-226 South Street and its agent have been ongoing since June 2022, at which point the site was being offered on the open market for sale as a development opportunity. The Council made an offer for the site in March 2023. Although the site has now been withdrawn from the market, discussions between the Council and the site's owner continue and the Council wrote to the owner in April 2024 advising that if a negotiated agreement could not be reached, as a last resort, the Council would include the site within the CPO. The owner has confirmed that he is willing to sell to the Council, subject to agreeing a price; these negotiations are ongoing.

15.35 **Efforts to acquire residential interests**

15.36 In total, there are 37 freehold residential properties located within the Order Land which have been or are currently owned by either private investors or owner occupiers. The residential properties front either Waterloo Road to the western side of the CPO Red Line Plan or Oldchurch Road which is located on the southern side of the Order Land. Of the 37 residential properties, the Council has successfully reached agreement with 32 property owners.

15.37 The following provides a status summary for each of the remaining five residential property interests within the Order Land where acquisition discussions and engagement remain ongoing:

103 Waterloo Road

15.38 Discussions to acquire the freehold interest by agreement commenced in June, 2016. The freehold owner instructed a surveyor to prepare a valuation report and deal with negotiations on their behalf. The Council paid the surveyor's fees directly. Negotiations progressed and Heads of Terms were drafted in September 2019, on the basis of an agreed Market Value of £380,000, plus other compensation, for an overall purchase price of £437,100. However, the owner subsequently decided not to progress with the sale of the property and terminated his surveyor's instructions. Discussions continue with the owner, but there remains a difference in opinion over the property's value.

111 Waterloo Road

15.39 Discussions to acquire the freehold interest by agreement commenced in June, 2016. Offers inclusive of loss payments have been made on two occasions, the first in June 2019 and the second in May 2020. Ardent wrote to the owner in March 2023 and have continued to chase on a regular basis, but no response has been received.

143 Waterloo Road

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15.40 Discussions to acquire the freehold interest by agreement commenced in June, 2016. Due to the owner's limited command of English, correspondence has been translated into Mandarin. An offer was forwarded to the owner in October 2019 which was re-affirmed in January 2020. Having had no response to the offer, Ardent wrote to the freeholder in April 2023 and July 2023 to re-open discussions and to provide an update on the progress of the Scheme. A face-to-face meeting was arranged with the owner and a translator in September 2023 but negotiations were inconclusive and there remains a difference in opinions of value.

145 Waterloo Road

15.41 Discussions to acquire the freehold interest by agreement commenced in June 2016. The owner is professionally represented. An offer was made in September 2019 which was re-affirmed in July 2023. Discussions between Ardent and the owner's surveyor progressed subsequently and resulted in an increased offer in July 2023. Negotiations remain on-going but there remains a difference in opinions of value.

30 Oldchurch Road

15.42 Discussions to acquire the freehold interest by agreement commenced in April 2019. Initially, local surveyors, Hilbery Chaplin, advised the Council and attempted to arrange access to undertake an inspection of the property during April, May and June 2019 in order to prepare a valuation report. However, access was not granted. Ardent was then instructed to deal with the property from October 2021. Since their instruction, Ardent have continued to attempt to arrange an inspection of the Property and have provided various dates to the owner when they would be available to inspect. However, Ardent was advised that the inspection needed to be postponed indefinitely due to a family health issues and so an inspection of the property has not yet been undertaken. This has prevented an offer being made.

15.43 **Acquisition of Rights**

15.44 The Council have contacted those with an interest in the land over which new rights are required in order to deliver the regeneration scheme with a view to obtaining the necessary rights by agreement.

15.45 **Owners of Rights**

15.46 There are a significant number of other rights and similar interests which affect parts of the Order Land. These are mainly rights attaching to freehold or leasehold interests within the Order Land, and the relevant rights would fall away once those interests are acquired by the Council.

15.47 **Unknown Owners**

15.48 There are three unknown or uncontactable owners: Trolara Trading (dissolved company); Apollonia Palmer (deceased); and Henry Seymour (no response).

15.49 The company Trolara Trading is dissolved. The company was incorporated in Cyprus and it might be that this ownership has reverted to the Crown - legal advice is being taken in this regard.

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16.0 Special Considerations affecting the Order Land

16.1 There are no areas of special category land (such as open space, commons or allotments) included within the Order Land.

16.2 There are no listed buildings, or ancient monuments within the Order Land. The Order land is not within a conservation area and there are no issues concerning consecrated land, renewal area or open space.

16.3 The proposals comprise the redevelopment of previously developed land that is free from any environmental, archaeological, landscape or ecological constraints.

17.0 Associated Orders

17.1 Paragraph 15 of the CPO Guidance requires acquiring authorities to be able to show that the scheme is unlikely to be blocked by any physical or legal impediments to implementation. It references the programming of any infrastructure accommodation works and the need for any planning permission or other consent or licence.

17.2 As set out in Section 7.0 of this Statement, planning permission is expected in the fourth quarter of 2025.

Stopping-up Order

17.3 Approximately 8,500 square metres of the development site is currently adopted public highway. This highway land comprises the main vehicular access into the site and internal access roads (including Bridge Close itself), footpaths and hard standings. It also includes multiple plots forming the pavements, verges, and landscaping along the western site boundary along Waterloo Road and the southern boundary along Oldchurch Road. Further plots are included at the junction of Union Road and Waterloo Road.

17.4 These plots all comprise adopted public highway, over which highway rights would need to be extinguished in order to facilitate the development. The London Borough of Havering is the Highways Authority for the relevant public highways and the majority of the plots are in the ownership of the London Borough Havering.

17.5 Section 247 (2A) of the Town and Country Planning Act 1990 ("the Act") empowers the Council to, by order, authorise the stopping up of any highway in accordance with the hybrid planning permission P1765.23, which is expected in the fourth quarter of 2025, if it is satisfied that it is necessary to do so.

17.6 Arrangements are now underway with a view to stopping up the public highway within the development site boundaries, to be secured via one or more stopping up orders under section 247 of the Town and Country Planning Act 1990 pursuant to the hybrid planning consent in place.

17.7 The required application(s) to secure the stopping up order(s) are being progressed by BCR LLP. As the relevant highway land is predominantly in the ownership of the Council, opposition to the proposal is not anticipated. In the event that any objections made before the making of the Order cannot be resolved, and the Mayor of London directs that an inquiry is necessary, such an inquiry would be conjoined with any inquiry relating to the Order.

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18.0 Government policy statements

18.1 The relevant statements concerning planning requirements have already been addressed in the previous sections of this Statement.

18.2 There are no other relevant policy statements applicable to the Order.

19.0 Conclusion

19.1 The implementation of the Scheme or the Varied Scheme as part of the Housing Zone will result in the transformation of Bridge Close and the wider area. The removal of secondary, basic quality commercial buildings from Romford Town Centre and replacement with a high-quality mixed-use development will create balanced, mixed and inclusive communities. This will directly result in an improved quality of life for the community including both existing and future residents. In order to achieve this, the compulsory acquisition of interests in the Order Land specified in the Schedule to the Order will be required so that the Scheme can be delivered within a reasonable timescale.

19.2 The acquisition of 222-226 South Street as part of the regeneration scheme will allow HICC to be relocated, thereby protecting the important role it provides the local and wider east London community. No alternative sites acceptable to HICC for its relocation have been identified.

19.3 Without the Order as a means of intervention, the existing low value commercial land uses would remain in place and it would not be possible to facilitate the comprehensive residential development that the regeneration scheme will provide. Any residential development that might be brought forward would likely be poor quality and piecemeal, failing to deliver the development outcomes which policy envisages for the area and substantial levels of new affordable homes. It would also fail to deliver the required housing mix, tenures or typology necessary to meet the objectives of the Housing Zone. The Order enables the Council to implement these wider objectives, improve infrastructure and enhance the amenity of the area.

19.4 The target acquisition sites at Bridge Close are characterised by low value, low density commercial and light industrial uses or low density housing which do not enable the change in land use and transformation envisaged in regional or local planning policy or facilitate the vision of the Council to create a vibrant new residential community in the area. Many of the businesses are considered to detract from the visual amenity and environmental quality of the area with operations often over spilling directly onto road frontages, in some cases creating a negative visual and environmental impact.

19.5 While tenants occupy 222-226 South Street, the redevelopment of the site is proposed in any event and the tenants all either hold short term leases, or leases with break clauses allowing development to take place.

19.6 The application for the Order is also intended to achieve wider regeneration objectives set out in the Masterplan and RDF. The Bridge Close regeneration includes public realm improvements centred around the River Rom, and the delivery of a clearly defined east-west pedestrian/cycle route linking the Ring Road pedestrian crossing to a new River Rom crossing and to the rail station via Atlanta Boulevard. This will provide a link between the growing residential areas to the west of the town through to a proposed southern entrance to Romford station.

19.7 The benefits of the Bridge Close regeneration include the creation of a new sustainable residential neighbourhood with supportive social and physical infrastructure (including

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which would act also as catalyst for economic growth, with the economic multiplier effect impacting positively on the local community. The delivery of the Housing Zone objectives will also direct investment and development activity in the area. The social benefits include the creation of a mixed, balanced, community with its own identity in a well-designed space for living, working and leisure thereby promoting social cohesion and wellbeing. The relocation of HICC to 222-226 South Street will protect the social function it currently provides and allow it to expand to meet the needs of the growing Muslim population in the surrounding area).

19.8 The environmental benefits include remediating and mitigating degraded, derelict, contaminated and unstable land, where appropriate, which will be one of the outcomes of the land acquisition strategy given the nature and existing uses of many of the target sites. Improvements to the River Rom corridor and provision of riparian habitat during operation / occupation will have a permanent beneficial effect on the River Rom that is significant at the Local level.

19.9 The Council considers that the Scheme and Varied Scheme will bring about the transformation of a Housing Zone Area which it has identified as a "priority housing estate for regeneration," and is satisfied that there is a compelling case in the public interest for the Order to be confirmed so as to secure the redevelopment and improvement of the Order Land as part of the Housing Zone. This will result in significant improvement in the economic, social and environmental wellbeing of the Council's area.

19.10 Confirmation of the Order will enable the regeneration of the Order Land to take place in accordance with a managed programme, providing certainty for land assembly and implementation of the regeneration. Such certainty will contribute towards the achievement of the Council's regeneration objectives for the Order Land and the wider Housing Zone as set out in adopted policy.

19.11 The Council has contacted all freeholders, leaseholders and other occupiers within the Order Land inviting them to enter into negotiations with a view to securing acquisition of their interests by agreement. These negotiations will continue in parallel with the compulsory purchase process. However, it currently appears unlikely the Council will be able to acquire all the necessary interests by private agreement within a reasonable timescale. Compulsory powers are being sought so that, in the event that the Council is unable to acquire all the necessary interests by private agreement within a reasonable timescale, development of the Order Land can still proceed.

19.12 The Council is satisfied that there are no planning or other impediments to the implementation of the redevelopment of the Order Land. Having regard in particular to the benefits to be achieved from the regeneration proposals, the low density and the poor quality of existing accommodation and the built environment in which it currently exists, the Council considers the use of compulsory purchase powers to be necessary and justified.

19.13 For the reasons summarised in this Statement, the Council considers the Order to be within the necessary statutory powers and that a compelling case exists in the public interest for the making and confirmation of the Order.

19.14 The Council, therefore, requests the Secretary of State to confirm the Order to facilitate the regeneration of the Order Land.

20.0 Additional Information

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General Information

20.1 Persons requiring further information regarding the Order should contact [ ] at the Council by email to [BridgeClose@havering.gov.uk] or by telephone on [01708 434434].

20.2 Owners and occupiers of the Order Land who wish to negotiate a sale or discuss matters of compensation should contact [Ardent Management Limited] or by telephone on [ ].

Compensation

20.3 Provision is made by statute with regard to compensation for the compulsory purchase of land and the depreciation in the value of affected properties. More information is given in the series of booklets published by the Ministry for Housing, Communities and Local Government entitled 'Compulsory Purchase and Compensation' Listed below:

- Booklet No 1 - Compulsory Purchase Procedure;
- Booklet No 2 - Compensation to Business Owners and Occupiers;
- Booklet No 4 - Compensation to Residential Owners and Occupiers.

20.4 Copies of these booklets are available on-line through the following link: www.gov.uk/government/collections/compulsory-purchase-system-guidance.

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APPENDIX A Map of the Order Land

[Attached Separately / To Be Inserted]

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APPENDIX B Order Schedule

[Attached Separately / To Be Inserted]

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APPENDIX C Statement of Commitments

[Attached Separately / To Be Inserted]

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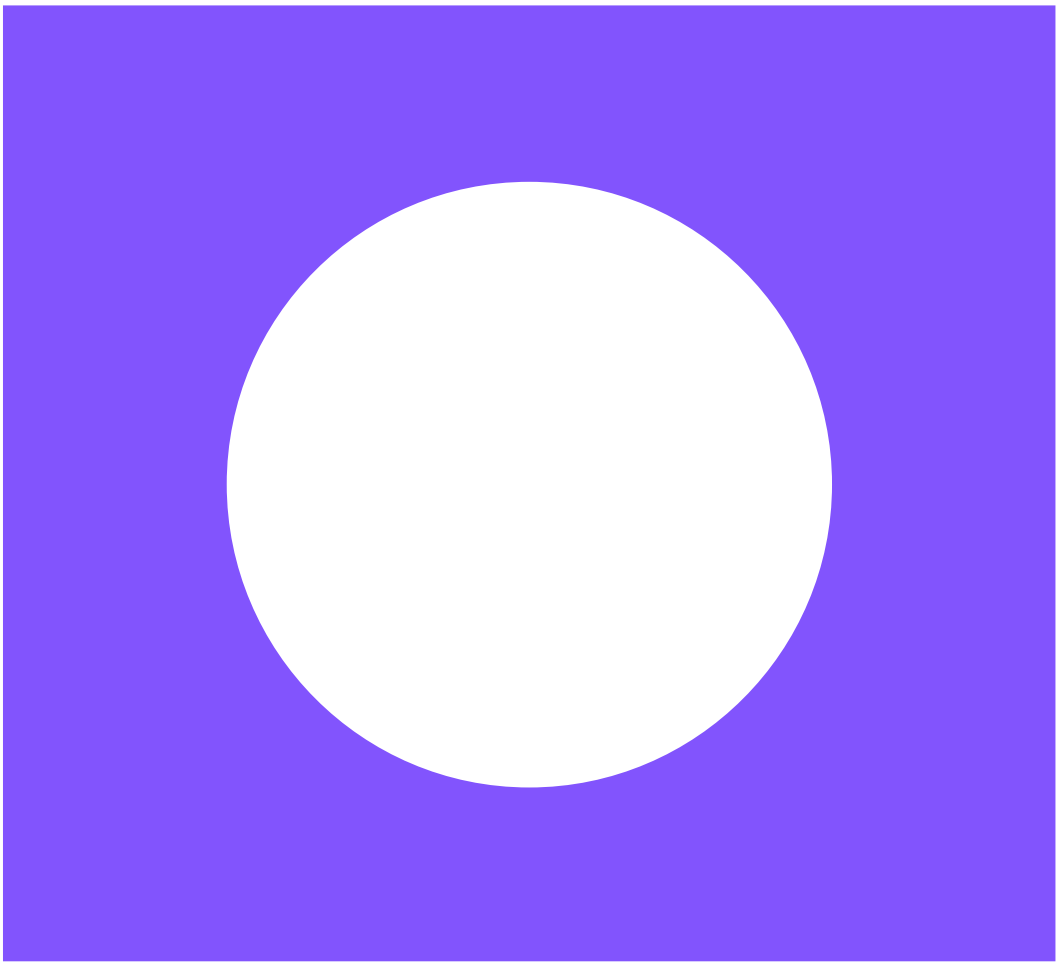
APPENDIX D Documents Referred to in This Statement of Reasons

1. National Planning Policy Framework National Planning Policy Framework: www.gov.uk/government/publications/national-planning-policy-framework--2
   London Plan: https://www.london.gov.uk/what-we-do/planning/london-plan
2. Core Strategy and Development Control Documents Development Plan Documents (adopted 2008)(Withdrawn): Core Strategy and Development Control Policies Development Plan Document (havering.gov.uk)
3. Havering Local Plan (adopted in 2021): Local Plan 2016-2031 Adopted 2021 (havering.gov.uk)
4. Romford Town Centre Development Framework (November 2015): Romford Development Framework 2015 (havering.gov.uk)
5. Strategic Planning Committee Minutes, 28th August 2025. Resolution to grant planning permission in respect of hybrid planning application with reference P1765.23.
6. Minutes of A Cabinet Meeting, Council Chamber, Town Hall, Wednesday [ ] and Report of the same date: Browse meetings - Cabinet | London Borough of Havering
7. Statement of Community Involvement
8. Bridge Close land Acquisition Strategy
9. Bridge Close Land Assembly Equality Impact Assessment

The National and London planning policies are available online but copies can be made available on request by contacting [ ].

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MOTT MACDONALD



Bridge Close Redevelopment

Equality Impact Assessment

October 2025

Mott MacDonald Restricted

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Bridge Close Redevelopment

Equality Impact Assessment

October 2025

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Issue and Revision Record

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2	July 2024	PD	HG	JB	Second draft for client comment
3	October 2024	EW/ GH	EW	JB	Update to include addendum
4	October 2025	PD	EW	LH	Refresh for CPO submission, integration of addendum into report

Document reference:

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1 Introduction

1.1 Overview

This report presents the findings of the Equality Impact Assessment (EqIA) for the redevelopment of the Bridge Close Site ('the Site'), which includes the proposed Compulsory Purchase Order (CPO) and assembly of land to enable development. The Site is located in Romford, in the London Borough of Havering.

The report sets out a summary of the background of the land assembly and redevelopment, the requirements of the Equality Act 2010 ('the Equality Act'), and the potential impacts of the redevelopment of the Site on people with characteristics protected under the Equality Act. Part of the function of this EqIA report is also to provide evidence related to the duties of Havering London Borough Council ('the Council') in relation to the proposed use of its CPO powers, and to provide a consideration of potential equality impacts associated with the scheme.

The findings set out within this report build upon previous equalities work undertaken by Stantec in 2023, Mott MacDonald in 2019, and by the Council in 2017 due to progress on the planning, commercial and community aspects of the development. Consequently, there is a need for an updated and more detailed understanding of how people may be affected. Following the Greater London Authority's (GLA) request for the redevelopment of the Site to consider local businesses and residents beyond the occupiers of the community, this updated EqIA builds upon previous work by applying a more detailed approach to assessment. This EqIA reports upon engagement with a diversity of stakeholders and utilises a desk-based evidence review of the wider area to present a comprehensive view of potential equality effects and explore strategies which may mitigate the effects of the development.

The assessment is focussed on the actual and potential impacts (both positive and negative) arising from the redevelopment, likely to be experienced by people considering their 'protected characteristics' as defined under the Equality Act. The report further sets out the mitigation measures put in place by the Council and provides recommendations on how any remaining impacts can be managed or mitigated.

1.2 The Equality Impact Assessment

1.2.1 The Equality Act and Public Sector Equality Duty

This EqIA has been undertaken in support of the Council's obligations under current UK equality legislation, and in particular the Equality Act. The Equality Act sets out a Public Sector Equality Duty (PSED), at section 149 and is set out in Figure 1.1 below.

Figure 1.1: Article 149 of the Equality Act 2010: The Public Sector Equality Duty

(1) A public authority must, in the exercise of its functions, have due regard to the need to—

(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

(2) A person who is not a public authority but who exercises public functions must, in the exercise of those functions, have due regard to the matters mentioned in subsection (1).

(3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—

(a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;

(b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;

(c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

Source: Equality Act 2010, legislation.gov.uk

The PSED is intended to support good decision-making. It encourages public bodies such as the Council to understand how different people will be affected by their activities. This means policies and services are appropriate and accessible to all and meet different people's needs. The Council must demonstrate that it has shown due regard to the aims of the PSED throughout the decision-making process to deliver the redevelopment of the Site. The process used to do this must take account of the protected characteristics which are identified below in section 1.2.3.

1.2.2 Assessing equality impact

While the PSED does not specify a particular process for considering the likely effects of policies, programmes and projects on different sections of society for public authorities to follow, this process is usually undertaken through some form of assessment, including EqIA.

Undertaking an EqIA helps to demonstrate how a public body is complying with the PSED by:

- providing a written record of the equality considerations which have been taken into account;
- ensuring that decision-making includes a consideration of the actions that would help to avoid or mitigate any negative impacts on particular protected groups; and
- supporting evidence-based and more transparent decision-making.

By understanding the effect of their activities on different people, and how inclusive delivery can support and open up opportunities, public bodies can be more efficient and effective. The EqIA process therefore helps public bodies to deliver the Government's overall objectives for public services.

1.2.3 Protected characteristics

An EqIA provides a systematic assessment of the likely or actual effects of policies or proposals on social groups with the following protected characteristics (as defined by the Equality Act):[1]

Protected characteristic	Equality and Human Rights Commission (EHRC) definition
Age	A person belonging to a particular age (for example 32-year olds) or range of ages (for example 18 to 30-year olds).

[1] Government Equalities Office/Home Office (2010): '*Equality Act 2010*'. Available at: www.legislation.gov.uk

Disability	A person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.
Gender reassignment	The process of transitioning from one gender to another.
Marriage and civil partnership	Marriage is a union between a man and a woman or between a same-sex couple. Couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples (except where permitted by the Equality Act).
Pregnancy and maternity	Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.
Race	Refers to the protected characteristic of race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.
Religion and belief	Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (such as Atheism). Generally, a belief should affect someone's life choices or the way they live for it to be included in the definition.
Sex	A man, woman or non-binary person.
Sexual orientation	Whether a person's sexual attraction is towards their own sex, the opposite sex or to all sexes.

An EqIA does this in the following ways:

- Assessing whether one or more of these groups could experience disproportionate effects (over and above the effects likely to be experienced by the rest of the population) as a result of the proposal being implemented. An EqIA includes examining both potential positive and negative effects.
- Identifying opportunities to promote equality more effectively.
- Developing ways in which any disproportionate negative impacts could be removed or mitigated to prevent any unlawful discrimination and minimise inequality of outcomes.

1.3 Previous equalities work

The equalities work has been conducted at three different points of the scheme's timeline: 2017, 2019 and 2023, each with different objectives and outcomes.

1.3.1 2017

Previous equalities work was undertaken by the Council in 2017 to identify the potential impacts of the initial redevelopment proposals of the Site on protected characteristic groups. The report was published in November 2017 and highlighted the following key considerations:

- Loss, or displacement of existing local businesses.
- Loss, or displacement of existing jobs and employment opportunities, affecting wider prosperity and growth.
- Displacement of long-established business and residential community could adversely affect community cohesion.
- Issues arising from more dense housing in the area, from 37 homes to approximately 1100 homes, such as an increase in traffic congestion and footfall leading to issues around public safety.
- Potential loss of, or displacement of the existing Ambulance Station, which could affect the delivery of some health support services.

- Impact on families due to displacement - relocation could result in families having to move schools, change job or travel further to work, impact social networks and lead to feelings of isolation and loneliness.
- Loss or displacement of existing faith and community groups.
- Reduction in local services provided by affected business to the local and wider community;
- The Bridge Close development is a key component of the overall regeneration ambitions for the area. Successful implementation will deliver a significant contribution to the London Borough of Havering's overall housing targets and infrastructure requirements including the provision of schools, health services, jobs and public amenity.
- New housing on this site has the potential to deliver a new neighbourhood for a community who will be able to enjoy high quality residential living in the town centre and to support the economic growth of the town through promoting an economically active and sustainable community.

The report concluded that the implementation of acquisition and relocation policies, best practice mitigation measures and communication and engagement will minimise much of the adverse impacts identified on those with a protected characteristic.

1.3.2 2019

In 2019, an EqIA was conducted by Mott MacDonald, outlining potential impacts on protected characteristic groups and proposing an action plan moving forward. The proposed plan of action included creating a communication and engagement plan focused on outreach through face-to-face engagement, including:

- Visits to homes and businesses.
- Information sessions on specific topics or themes.
- A review and update of information available on the dedicated website.
- Additional regeneration update events.
- Consideration should be given to ensuring all information is provided in appropriate formats and languages to suit different needs.

The results of the EqIA suggested the need for further follow up on equality concerns identified through outreach, and for maintaining up-to-date records of changing needs, to determine what extra support could be provided to vulnerable residents, owners and employees in terms of mental health and wellbeing.

1.3.3 March 2023

The effects of the hybrid planning application on people who belong to any of the nine protected characteristics were examined by Stantec in an EqIA in the first quarter of 2023. The Design Code for the development was also evaluated from an equalities perspective, and feedback was given for the newsletter and contact list for the consultation as part of the work. The report gave an overview of the consultation so far and analysed how each protected group was affected by the proposals and what actions could be taken to address their needs. It also provided integrated recommendations for further consideration during the reserved matters and detailed design stage of the Proposed Development.

1.3.4 Conclusions

The equalities work has shown a progressive and comprehensive approach to assessing and mitigating the impacts of the redevelopment proposals on the protected groups and has provided valuable insights and recommendations for the council to consider.

The success of other schemes across the country has depended largely on consultation. This involves engaging with the relevant stakeholders before finalising the proposals for redevelopment, and monitoring and evaluating the scheme throughout its development, construction, and into its operational life. The contact with protected characteristic groups increased through the consultations in all three equality impact assessments.

2 Our approach

This EqIA aims to build on the effects of the previous equalities work as the planning, commercial and community aspects of the development have progressed. Consequently, there is a need for an updated and more detailed understanding of how people may be affected.

2.1 Overall approach to the EqIA

The approach to this EqIA employs the bespoke Mott MacDonald INCLUDE toolkit, which sets out the following steps:

1
Understanding the project Analysis of the proposals for the Bridge Close Redevelopment site and activity intended to manage impacts.

2
Evidence, distribution, and proportionality. Review of available demographic data and other published evidence to understand potential equality risks.

3
Engagement and analysis Engagement, where possible, with community facilities and businesses and to gather their views.

4
Impact assessment. Understanding the extent and scale of any impacts arising, taking mitigation measures into account.

5
Drawing conclusions and action planning. Setting out the overall effects of the scheme and identifying opportunities and further actions to manage and mitigate.

2.2 Tasks undertaken

Within the steps above, the following tasks were undertaken to deliver the assessment:

2.2.1 Understanding the scheme

Discussions with the Council: Numerous discussions were undertaken with the Council to understand the context of the local area and history of the redevelopment to date, as well as plans to support those who will be affected by the programme.

Discussions with Ardent Management: Conversations were held with Ardent Management regarding the commercial occupiers on Site to ensure that information being reported was coherent with the latest scheme developments.

Review of redevelopment strategies and proposals: A review of information associated with the scheme was undertaken, including details of the redevelopment proposals, including the Bridge Close Business Relocation Strategy, Bridge Close Regeneration LLP Business Plan Refresh 2023-24 and the Council's Housing Regeneration Pack. As part of the 2025 refresh, the documents from the 2025 Planning Application, including the Statement of Reasons were reviewed. Additionally, EqIAs of the proposals in 2017, 2019 and 2023, and publicly available exhibition boards were also reviewed.

2.2.1.1 Evidence, distribution and proportionality

Desk-based evidence and literature review: To better understand the potential impacts arising from the redevelopment of the Site, and to help to identify possible mitigations and opportunities associated with the programme, relevant published literature from governmental, academic and third sector sources were reviewed. This allowed for the characterisation of potential risks and

impacts typically associated with CPO and redevelopment projects, to understand whether they apply in this instance.

Demographic analysis of the Site and surrounding area: A social and demographic profile of the area of the Site and local area was collated using publicly available data and compared with wider social and demographic data to further build a picture of the area in which the Site is located. This was refreshed in 2025 to ensure the demographic data is up to date.

Site demographic referencing: Site demographic referencing took place in June 2024 in order to update the Site demographic referencing exercise that was previously undertaken as part of the 2019 EqIA. This provided an updated understanding of who will be affected by regeneration of the Site. To achieve this, survey activity was carried out on Site, with face-to-face engagement attempted with each property (both residential and commercial) which is understood to be occupied. The survey is intended to develop a profile of those on the Site, by capturing demographic information around protected characteristics from residents and those working there, as well as business owners.

2.2.1.2 Engagement and analysis

Residential and commercial survey: As part of the Site demographic referencing exercise mentioned above, surveys were carried out to ensure that views regarding the scheme of residents, and representatives of businesses and community facilities have been captured as part of the EqIA. This method of engagement provided an opportunity for both residents and businesses to contact the Mott MacDonald project team should they wish to share their views in a telephone interview.

Analysis of results: Impact analysis has been updated based on the revised evidence gathering above to analyse the risks associated with the overall project. This has set out the potential effects of the project on people with protected characteristics, based on risks identified and demographic profiling of the local area.

2.2.1.3 Impact assessment

Assessment of potential disproportionate effects: Potential effects were identified and assessed using the research undertaken in the stages above. Assessment of effects was undertaken in light of the sensitivity of the affected parties to the redevelopment, and distribution of people with protected characteristics around the Site. Both adverse and beneficial impacts were identified in the context of any mitigation measures implemented or proposed by the Council. This has been reviewed and refreshed as part of the 2025 update.

Identification of further opportunities and mitigation measures: Where potential disproportionate effects have been assessed, we have identified, where possible and appropriate, mitigation and enhancement measures in extension to those proposed by the Council.

2.2.1.4 Drawing conclusions and action planning

Reporting: Based on the impacts identified, a series of conclusions and further recommendations were developed, to help manage the redevelopment process in a way that minimises the potential for adverse impacts where appropriate.

Action planning: An action plan was developed which outlines the responsibilities to involved and affected parties following submission of this EqIA. This has been reviewed and refreshed as part of the 2025 update.

2.3 Methodology for identifying impacts

2.3.1 Assessing impacts

The assessment of impacts across the EqIA process is predominantly qualitative and describes, in as much detail as possible, the nature of the impact on:

- community facilities on the Site and their service users;
- commercial properties on the Site, including owners, employees and customer bases;
- owners of commercial and residential property on the Site;
- residents living on the Site; and
- members of the local community.

The assessment considers:

- whether the effect improves or worsens the lives of those affected by the redevelopment;
- the relationship of the effect to the redevelopment (e.g. direct relationship such as loss of property or indirect relationship such as loss of access to services);
- the length of time that people are affected;
- the severity of the change;
- the number of people likely to be affected; and
- the resilience of those who are affected.

2.3.1.1 Differential impacts

Differential impacts occur where people with protected characteristics are likely to be affected in a different way to other members of the general population. This may be because groups have specific needs or are more susceptible to the impact due to their protected characteristic. These impacts are not dependent on the number of people affected.

2.3.1.2 Disproportionate impacts

Disproportionate impacts occur where there is likely to be a comparatively greater effect on people from a particular protected characteristic group than on other members of the general population. Disproportionate effects may occur if the affected community comprises of a higher than average proportion of people with a particular protected characteristic, or because people from a particular protected characteristic group are the primary users of an affected resource.

3 Bridge Close: redevelopment context

3.1 Scheme Context

The Site, defined by the red line boundary (RLB) in Figure 3.1 below, is located in Romford, in the London Borough of Havering. The Site area is approximately 3.68 ha and is located at the junction of Waterloo Road and Oldchurch Road, lying within the Romford ring road. The Site is positioned to the south of Romford Railway Station and is bordered by the Great Eastern Main Line to the north.

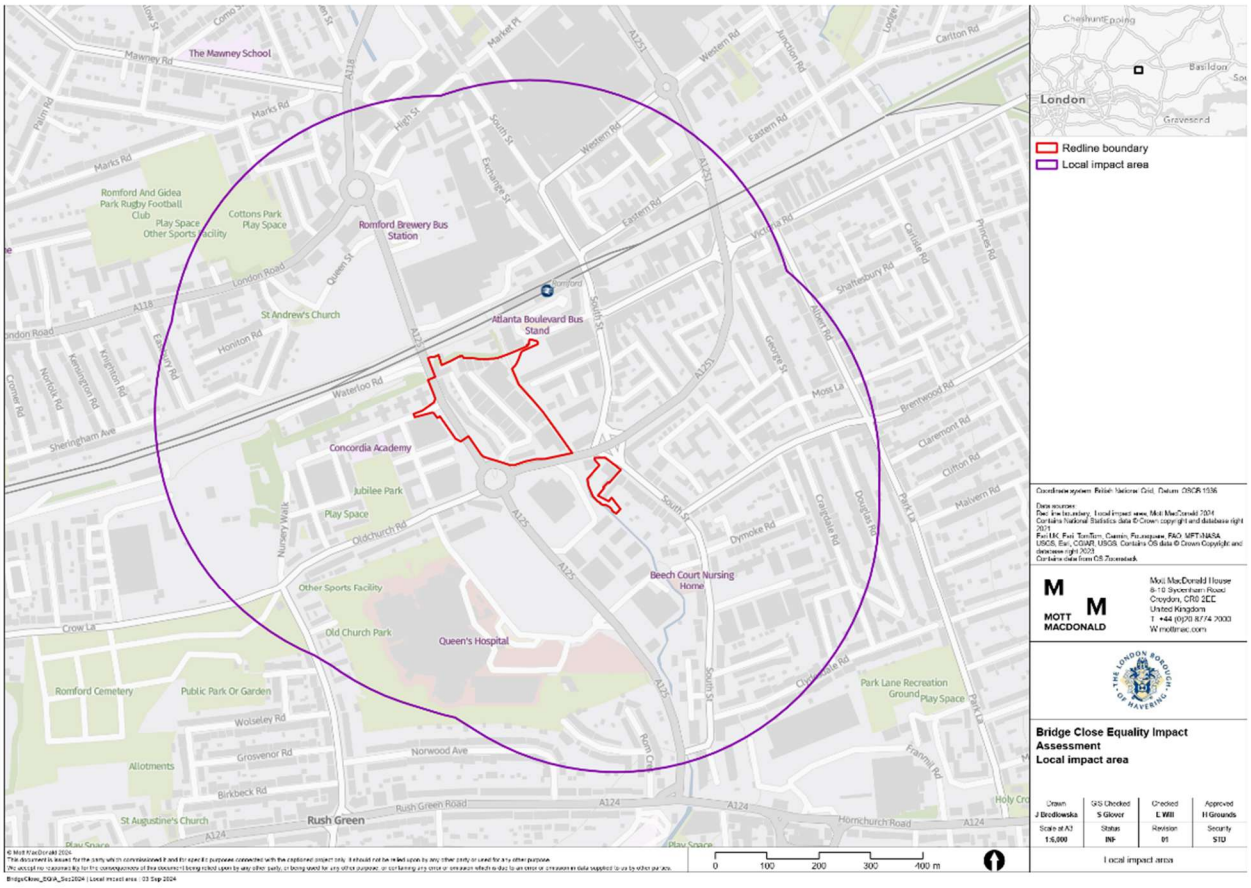
The Site is currently comprised of a mixture of both residential (37 properties) and commercial buildings (40 interests across approximately 17 buildings). This includes a community centre which is currently occupied by the Havering Islamic Cultural Centre (HICC), and a London Ambulance Service station. Businesses are largely located in a mix of industrial warehouses and ancillary units under multiple ownerships.

The River Rom runs along the eastern extent of the Site. However, it is currently hidden, unusable and subject to fly tipping and antisocial behaviour. The current pedestrian bridge over the river is underused and it is reported that many residents feel unsafe using this. The Site also currently suffers from poor accessibility due to the constraints imposed by the ring road, railway line and river.

Figure 3.1, outlined below, shows the Red Line Boundary (RLB) of the Site. The RLB was updated in late 2024 to include the planned relocation site of the HICC at South Street.

Mott MacDonald Restricted

Figure 3.1: Red Line Boundary (RLB)



Source: Mott MacDonald (2025)

3.2 The need for redevelopment

Redevelopment of the Site was first established in the Romford Area Action Plan 2008.[2] The Site was identified as having potential to provide means for residential development, new public spaces, enhancements to the River Rom and pedestrian and cycle links from east to west. Redevelopment was subsequently established in the Romford Town Centre Development Framework 2015, which was agreed by Cabinet.[3]

The Site is in need of regeneration due to its infrastructure consisting of poor dated housing and light industrial units. The regeneration aims to transform the area into a lively and sustainable mixed-use neighbourhood. The scheme will also address the demand for more housing in the borough, especially in a location that is close to excellent public transport connections, shopping and leisure facilities.

Bridge Close is also one of the Council's key development sites as part of the Romford Housing Zone (HZ) programme. As a result, the redevelopment has been allocated up to £12.4m in grants from the Greater London Authority (GLA) Housing Zone Programme to fund its delivery.

[2] London Borough of Havering (2008): 'Romford Area Action Plan Development Plan Document, Adopted 2008'. Available at: https://www.havering.gov.uk/download/downloads/id/1633/romford_area_action_plan.pdf
[3] London Borough of Havering (2015): 'Romford Town Centre Development Framework 2015'. Available at: https://www3.havering.gov.uk/Documents/Regeneration/Romford-Development-Framework-Launch.pdf

The purpose of the HZ programme is to unlock land for development, allowing an increase in housing supply and future development.[4]

Following this, in 2018, the London Borough of Havering entered into a joint venture (JV) with First Base and Savills Investment Management to form Bridge Close Regeneration LLP (BCR LLP) for the regeneration of the Site. The JV was initially established to ensure the comprehensive regeneration of the Site, and to contribute towards a wider vision and high-profile growth agenda in the borough.

However, due to several factors (including a slowing housing market, increased construction costs, design enhancements, inflation and COVID-19) it was not possible to project a level of viability for the scheme that would meet the requirements of the Council's private sector partner. In order to protect the redevelopment plans for the Site, the Council reached an agreement to purchase the private sector partner's interest in the JV. As a result, in late 2020, the Council Cabinet agreed to buy out the interest of its JV private sector partner.

3.3 The proposed development

The mixed-use development is intended to provide a new urban quarter within Romford Town Centre consisting of new homes, jobs, and community facilities.

	The proposed redevelopment
Residential provision	● Delivery of up to 1,070 homes with enhanced fire safety measures, reflecting the most recent changes in legislation, maximised family homes with 35% designated as affordable housing, improved entrance areas, increased flood risk resilience, and provisions for solar panels and cycle storage.[5] ● Housing will meet a range of local needs, providing diverse accommodation types from one-bedroom units to family sized four-bedroom units. ● Prior to planning obligations and legal agreement, the Council have delegated that of the 35% affordable units, there is a tenure split of 30% Social Rent/London Affordable Rent and 70% intermediate. ● 90% of homes in Plot A designed to be accessible.
Commercial provision	● Up to 5,965 sqm of commercial floorspace including office and flexible workspace, retail and professional services and leisure uses, of which 20% will be affordable. ● Once operational, the Site will generate approximately 628 on-site FTE jobs upon completion, based on the employment densities for each use class within the proposed development. These include use classes such as commercial (mix of office, maker space, retail, f&b, leisure), primary school and nursery, community centre, healthcare and homeworkers. ● Approximately 306 temporary on-site construction jobs (once the effects of leakage, displacement, and multiplier effects have been considered, 353 net additional construction jobs) created from the development.
Community provision	● Community facilities, of up to 6,970 sqm will be provided including a three form entry primary school and nursery, a flexible health centre / commercial unit and a community centre. ● Prior to planning obligations and legal agreement, the Council have delegated that if the primary school and nursery cannot be delivered on site, then the applicant will pay a section S106 financial contribution towards education within the borough at £2,370,726). ● The new three form entry primary school will provide 630 school places 47 nursery places. Across both educational facilities there will be a total on 18 spaces for SEND pupils. ● Prior to legal agreement The Council have delegated that:

[4] Greater London Authority (2018): 'DD2215 Romford Housing Zone, London Borough of Havering – Bridge Close' Available at: https://www.london.gov.uk/decisions/dd2215-romford-housing-zone-london-borough-havering-bridge-close

[5] London Borough of Havering (2025) 'Bridge Close Development Project Advances to Strategic Planning Committee' Available at: Bridge Close Development Project Advances to Strategic Planning Committee | London Borough of Havering

	The proposed redevelopment
	1. £2,000,000 is put towards acute care in the Romford area and to offer a medical centre to the NHS trust on reasonable terms, any alternate use only permissible if NHS confirms that accommodation is not required. 2. provide an alternative site to accommodate the London Ambulance Service (LAS), 3. provision of a suitable access/parking to LAS site during/after implementation of Phase 1 and; 4. provision of a community use agreement for the multi-use games are.
Public realm	• New connections to Romford town centre, including a new pedestrian/cycle bridge across the River Rom and provision of new vehicular and pedestrian access points. • Public open space, including a new public square, civic square and riverside walk. • Car, motorcycle and bicycle parking spaces. • Parking provisions include car, motorcycle, and bicycle spaces, with a car club space and two years of free membership for residents. A £25,000 contribution will support a Controlled Parking Zone (CPZ), and residents will be restricted from obtaining parking permits. • A range of planting and green spaces across the Site to enhance wildlife, improve biodiversity and complement the built environment.

Figure 3.2: Bridge Close Regeneration Project scheme design



Source: The London Borough of Havering, 2024

3.4 Phasing of the redevelopment

In order to successfully deliver the Site, the redevelopment has been split into three phases:

- Phase One is expected to commence in 2025. This phase will deliver approximately 383 new homes of which up to 126 (33%) will be affordable residential units (39 affordable rent and 87 shared ownership) and 257 (67%) private. In addition, the phase will deliver flexible retail

and commercial premises to serve the local community and provide space for local business. The new primary school and nursery will also be constructed. This initial phase will focus on enhancing connectivity to the town centre with the introduction of a new pedestrian and cycle bridge. Improvements to the public realm will also be made, including the revitalisation of the River Rom.

- Phase Two due to commence in 2026. This phase is expected to deliver approximately 259 new homes of which approximately 35% and 50% will be affordable housing along with further retail and commercial units. In addition, a new health building would be provided to cater or families at Bridge Close and the wider community, serving to reduce pressures on acute care at nearby Queen's Hospital. A new community centre will also be built.
- Phase Three will commence in 2027 and deliver approximately 428 additional new homes of which 35% would be affordable housing.

Table 2.1 below highlights each phase of the redevelopment against key milestones and delivery dates.

Table 2.1 Indicative Delivery Programme

Milestone	Phase 1	Phase 2	Phase 3
Start on Site	Quarter 2 '27	Quarter 1 '29	Quarter 1 '30
New Homes Completed	Quarter 3 '30	Quarter 3 '31	Quarter 1 '33
Final Sales Completed	Quarter 4 '30	Quarter 3 '32	Quarter 2 '34

Source: Bridge Close Regeneration LLP, 2024

3.4.1 Planning Approval

Following submission of the Planning Application, the Councils Strategic Planning Committee resolved to grant planning permission for the scheme in late August 2025.

3.5 Extension to RLB

After engagement with the HICC, the Council made the decision to extend the RLB and CPO boundary from its original designation to include 222-226 South Street. This decision to extend the RLB to include this building and land space has been made to provide a space for the HICC to be relocated. The existing HICC will be demolished as part of the redevelopment and expansion of the Site.

The original phasing plans for the redevelopment impacted the HICC currently located at the north-eastern corner of the Bridge Close Estate, without a definite plan for its relocation or future.

The HICC is a valuable and long-established community facility which serves the needs of the local Muslim population and other members of the local community. The HICC was established in 1982 to meet the religious needs of the local Muslim community, and the social and cultural needs of all local residents.

3.5.1 Opposition to original planning application

In February 2024, HICC submitted a formal objection to the planning application for the Site, which consisted of the following key objections:

- Regeneration would include the redevelopment of the HICC site in its entirety, and the demolition of the buildings will create a loss of physical, religious, cultural and community presence.
- There is a failure to provide suitable re-provision of a space for HICC to operate.
- There is a lack of understanding of the importance of the HICC for surrounding communities.
- Insufficient external amenity space has been offered. HICC currently includes an area of private amenity space (access and hardstanding, including car parking) which provides a valuable area of outdoor amenity space for worshippers, particularly when arriving and leaving the premises.

3.5.2 Relocation to 222-226 South Street

It is important that HICC remains in an easily accessible location in Romford Town Centre, but suitable alternative sites in the town centre are extremely limited. An alternative site at 222-226 South Street was identified and has been agreed by the Council and HICC as being the only suitable off-site relocation opportunity that is suitable and meets HICCs needs. Although 222-226 South Street is occupied by a number of business occupiers, its current owner has aspirations for development in the short to medium term, and the occupiers either hold short term leases, or leases with break clauses that permit early development.

It is anticipated that:

- The new Mosque design will be larger than the current location.
- The upcoming Mosque will have the capacity to host more than 1000 individuals during a single Jumu'ah, enabling the HICC to meet the growing demand for their services.
- The new Mosque will be built as an eco-Mosque, using the latest technology to reduce carbon footprint and running costs. It will be constructed to Passivhaus standard, a world leading energy efficiency and thermal performance standard.
- The development will provide for a safer local community where, as a result of the application of Secured By Design principles, buildings and the public realm within Bridge Close will provide a safe environment for local residents and the wider community to live, work and play.

In order to facilitate this, the RLB and CPO boundary was extended in 2024 to include building and land space to the south of the original Site, which is currently occupied by six businesses, listed within the table below:

Table 3.1: Businesses within the updated Study Area

Address	Business	Additional information
222-224 South Street, RM1 2AD	Panthera Corporation Limited	Licensed restaurant
226A South Street, RM1 2A	Samuel Mataley	Business director of licensed restaurants
226B South Street, RM1 2AD	The Hearing Hub Ltd.	Specialists medical practice activities
Unit A, r/o 222 South Street, RM1 2AD	Fit4Life Group Ltd.	Fitness facilities
Unit B, r/o 222 South Street, RM1 2AD	Muhammad Fakhar Ur Rehman.	Business director
Rear car park, r/o 222 South Street, RM1 2AD	Highway Express Limited	Taxi service

The extension of the RLB to include this area will result in CPO powers being exercised resulting in the demolition of the building and the relocation or extinguishment of associated businesses.

3.6 Compulsory Purchase Order

Section 226 (1) (a) of the Town and Country Planning Act 1990 authorises a local authority to exercise its compulsory purchase powers. This is the case if acquiring the land in question will facilitate the carrying out of development, redevelopment, or improvement on, or in relation to, the land being acquired, and it is not certain that acquisition would be achieved by agreement.[6]

A local authority must not exercise the power under section 226(1)(a) of the 1990 Act unless they think that the development, redevelopment, or improvement is likely to contribute to the achievement of any one or more of the following objectives:

- the promotion or improvement of the economic well-being of their area.
- the promotion or improvement of the social well-being of their area.
- the promotion or improvement of the environmental well-being of their area.7

The Romford Town Centre Development Framework 2015 identified the existing Site ownership pattern as complex.[8] However, it recognised the short-term redevelopment potential, therefore making the regeneration a priority. As a result, the framework established that, where necessary, the Council may be required to use its CPO powers to acquire land holdings:

"The Council may need to play a proactive role in land assembly if necessary, using its Compulsory Purchase Order (CPO) powers to support the delivery of a comprehensive redevelopment…"

Cabinet gave the Council approval in June 2016 to enter into direct negotiations with owners on the Site to enable the regeneration of Bridge Close. This allowed the Council to acquire properties through private treaty.[9]

In February of 2024, Cabinet requested that the Director of Regeneration, in consultation with the S151 Officer and the Monitoring Officer, bring forward a report for the making of the CPO for the Bridge Close Regeneration scheme at the appropriate time in the financial year 2024-2025.[10]

[6] Ministry of Housing, Communities & Local Government (2019) Guidance on Compulsory purchase process and the Crichel Down Rules
[7] Legislation UK (1990): 'Town and Country Planning Act 1990'
[8] London Borough of Havering (2015): 'Romford Town Centre Development Framework 2015'. Available at: https://www3.havering.gov.uk/Documents/Regeneration/Romford-Development-Framework-Launch.pdf
[9] London Borough of Havering (2018): 'Cabinet Report 29th November 2018'. Available at: http://democracy.havering.gov.uk/documents/s34945/Bridge%20Close%20-%20Report.pdf
[10] The London Borough of Havering (2024): 'Cabinet report - Bridge Close Regeneration LLP Business Plan Refresh 2024-2025'.

3.7 Overall approach to acquisitions

The approach to acquisition of commercial and residential properties has, and will continue to, follow the Government's Compulsory Purchase Order Guidance[11], the Crichel Down Rules[12] and the Compensation Code.[13] The approach supports property owners and occupiers through:

- making offers to eligible property owners and occupiers which reflect their entitlement to compulsory purchase compensation and the 'value for money' the acquisition may provide to the scheme as a whole;
- engaging proactively and constructively with businesses and residents over relocation issues where relevant;
- working with businesses and residents to mitigate the risk of loss, as far as it is reasonably able to do so; and
- where disputes over compensation arise, considering settlement of those disputes through the early use of Alternative Dispute Resolution.

Development of the Order Land requires the acquisition of a number of property and land interests. Land referencing undertaken by a third party has identified 111 registered freehold interests and 6 registered leasehold interests within the Order Land which are affected by the CPO. With the exception of other land such as adopted highway and verge, the identified property interests include 16 premises in business use, 4 premises in religious/community use, 2 properties in mixed use, 37 residential properties, 1 electricity substation, and 1 pumping station.

3.7.1 Commercial acquisition status

The Council has been actively negotiating with owners since 2016 to acquire all interests in the Order Land. Ardent has been appointed by the Council to value and actively negotiate with all affected parties.

Ardent has met with as many of the landowners as possible and undertaken inspections in order to provide the Council with accurate valuations for each property to establish potential acquisition costs and to enable offers to be made. Contact has also been made with occupiers to understand their requirements in terms of relocation premises and to identify any specific issues that will need to be addressed as a result of properties being acquired. The Council has employed a firm of local commercial property agents, Mass & Co., to assist business occupiers identify and secure new premises.

The Council have yet to achieve an agreement over the vacant possession of six commercial buildings. Information regarding the status of these buildings and ongoing discussions are presented in the table below, as of October 2025.

[11] Ministry of Housing, Communities and Local Government. (2004): 'Compulsory purchase and compensation booklet 1: procedure'. Available at: https://www.gov.uk/government/publications/compulsory-purchase-and-compensation-booklet-1-procedure

[12] Department for Levelling Up, Housing and Communities (2019): ' Guidance on Compulsory purchase process and The Crichel Down Rules Available at: Compulsory purchase process and the Crichel Down Rules (publishing.service.gov.uk)

[13] This body of law governs how losses are assessed, ensuring you are neither financially 'worse off' nor 'better off' due to compulsory purchase.

Table 3.2: Outstanding commercial acquisition status

	Address	Occupancy	Summary of engagement to date
1	1 Bridge Close	Vacant	Owner has been engaged since 2018 and has been made three financial offers for the building. Negotiations are ongoing
2	4 Bridge Close	Simply Logistics Ltd	An offer has been made, but negotiations are dependent on relocation properties. At least eight properties have been offered to the owner
3	5 Bridge Close	Superior Food	An offer has been made, but negotiations are dependent on relocation properties. The Council are in regular contact with the owners regarding alternative suitable provision and a number of alternative properties have been identified.
4	7 Bridge Close	Romford Catering Supplies	An offer has been made, but negotiations are dependent on relocation properties. The Council are in regular contact with the owners regarding alternative suitable provision and a number of alternative properties have been identified.
5	11 Bridge Close	Iconic Plastics	Engagement has been made with the owner and an offer made but rejected. Negotiations are planned to resume in the next few months
6	14 Bridge Close	Budbridge Property Investments Ltd	Occupiers happy to relocate subject to finding a relocation property. Negotiations ongoing

Section 4.2.4 and 4.2.6 provide further details about the Council's current acquisition status of residential and commercial property interests. If the Order is confirmed, the Council intends to use its CPO powers to acquire land interests that it is unable to secure through private treaty negotiations.

3.8 Support for affected residential, commercial, and community properties

To gain further insight into the support provided for residents, commercial occupiers and community properties, documents produced by the Council were reviewed. The following summary profile provides an overview of the plans that the Council have proposed to provide support to these groups. More detailed information on the support being provided by Bridge Close Regeneration LLP – including the Business Relocation Strategy, Land Acquisition Strategy and Housing Regeneration Package – can be found in Appendix D.

3.8.1 Support available to residents

The Council has produced a Housing Regeneration Pack[14] that sets out its commitments to support residents of Havering throughout its Housing Regeneration Programme, including the redevelopment of the Bridge Close Site. The Council has committed to regular communication regarding regeneration proposals throughout the entirety of the scheme. This will be via one-on-one meetings, direct letter correspondence, newsletters, briefings, events, website and email updates, in addition to dedicated points of contact within the Council's housing function. The Council also has dedicated housing team resource to manage each type of resident that lives on the Site. To minimise stress on the resident, the Council has committed to ensure that

[14] London Borough of Havering (2018): 'Havering Council's Housing Regeneration Programme: Housing Regeneration Pack'. Available at: https://www.havering.gov.uk/download/downloads/id/1875/details_of_the_housing_regeneration_scheme.pdf

housing options are suitable and affordable. Additionally, support, advice and effort to keep the community together have also been commitments by the Council.

The Housing Regeneration Pack[15] is comprised of multiple documents with information specific to different types of residents. A summary of the support available covered in each document can be found in Appendix D. Details for council tenants, property owners and private tenants can be found in the following documents within the Pack:

Council Tenants:

- (2) Local Lettings Plan (for secure & introductory Tenants)
- (3) Decant and Possession procedures

Property Owners:

- (4) Information for Property Owners

Private Tenants:

- (5) Re-housing Options for Private Tenants

3.8.2 Support available to commercial properties

3.8.2.1 Business relocation approach

Accommodating local businesses and wider commercial properties, the business relocation approach aims to provide support for commercial properties by conducting a review of the current business occupiers on the Site, assessment of current supply and providing compensation. The Council has established a process for identifying and supporting businesses to find new locations elsewhere. In the occurrence of a disagreement over the compensation offered, the Council will give consideration through use of Alternative Dispute Resolution.

The Business Relocation Strategy states that the Development Manager will act as a liaison between the Council and businesses. The Development Manager will engage with occupiers over relocation issues and will:

- Produce a comprehensive and ongoing assessment of the current occupiers needs and requirements, and potential alternative sites;
- Accurately record all correspondence with businesses;
- Manage third party consultants, including those appointed to offer compensation advice;
- Ensure disturbance to the businesses is minimised, offering support measures where available; and
- Work effectively with relevant organisations to ensure that businesses receive up-to-date and reliable information about the relocation process.

The level of support available to businesses will differ on a case-by-case basis, including identifying appropriate alternative sites within the borough or in neighbouring boroughs, business analysis support and additional financial support may be offered in advance of taking possession of the property to help facilitate the relocation. Payment of reasonable interim professional fees;

[15] London Borough of Havering (2018): 'Havering Council's Housing Regeneration Programme: Housing Regeneration Pack'. Available at: https://www.havering.gov.uk/download/downloads/id/1875/details_of_the_housing_regeneration_scheme.pdf

- early acquisition and leaseback of a business' existing site to allow for a new premises to be acquired and prepared while the business continues to operate at its current location; and
- an option to provide the certainty of an agreed purchase price for an existing property once alternative premises have been identified.

A full overview of the Business Relocation Strategy can be found in Appendix D.

4 Site and wider area profile

4.1 Overview

The RLB of the Site has been extended to include an area to the south of the previous RLB at 222-26 South Street, as set out in Chapter 3. A 500m buffer around the RLB constitutes the Local Impact Area (LIA) for this EqIA to capture nearby receptors that may be affected by the scheme. This chapter provides a summary of the full updated socio-demographic analysis for the LIA.

4.2 Demographic data

4.2.1 Publicly available demographic data

The area profile summary in Table 4.1 provides a high-level summary of the socio-demographic profile of the LIA in comparison with the borough of Havering, the Greater London region, and England. It also includes a summary of the findings of a socio-demographic baseline conducted through desk-based research using the Office of National Statistics data.

The summary includes analysis of protected characteristic groups under the Equality Act 2010 and the current socio-economic context of the area. In comparing these regions, where the Site or LIA deviates by more than 3% the difference is considered to be substantial and is reported as such.

The data used in the baseline is the most current publicly available data from the Office of National Statistics. Where there are higher proportions of certain groups within the LIA, this is written in **bold text.**

A more detailed breakdown of the socio-demographic baseline can be found in Appendix A.

Table 4.1: Summary of demographic groups

Protected Characteristic group	Comparison with Havering, Greater London and England
Age	• The proportion of children within the LIA (22%) is **slightly higher than the regional and national proportions (both 19%),** however is broadly in line with Havering (20%). • 9% of the population within the LIA are young people, which is broadly in line with Havering (10%) alongside the regional and national figures (both 11%). • The proportion of the population who are of working age within the LIA (70%) is **considerably higher than both Havering (62%) and England (63%),** however is broadly in line with the regional proportion of 69%. • 7% of the population within the LIA are older people, which is considerably lower than within Havering (18%), Greater London (12%) and England as a whole (18%).
Disability	• The proportion of the population within the LIA with a disability that limits their day-to-day activities a lot (5%) is broadly in line with Havering (6%), Greater London (6%) and national proportions (7%). • The proportion of population within the LIA with a disability that limits their day-to-day activities a little (7%) is broadly in line with Havering (8%) and Greater London (7%), however is slightly lower than England as a whole (10%).

Protected Characteristic group	Comparison with Havering, Greater London and England
	● 4% of the LIA population have a long term physical or mental health condition, however their day-to-day activities are not limited. This is broadly in line with Havering (6%) and Greater London (5%), however slightly lower than England as a whole (7%).
Gender reassignment	● There is no data on gender identity for the LIA. ● The proportion of the population with a gender identity the same as sex registered at birth is slightly lower in Greater London (91%) than both Havering and England (both 94%).
Marriage and civil partnership	● No impacts are anticipated with regard to marriage and civil partnership; however demographic data has been collected. ● The proportion of the population who are single in the LIA (48%) is broadly in line with Greater London (46%), however **considerably higher** than the proportion within Havering (37%) and England (38%). ● The population of those married in the LIA (38%) is broadly in line with Greater London (40%), however **considerably lower** than within Havering (47%) and England as a whole (45%). ● 0.2% of the population in the LIA are in a registered civil partnership and 8% are in a civil partnership which is now legally dissolved, these are both broadly in line with all other geographical comparators. ● 3% of the population within the LIA are widowed or a surviving partner which is broadly in line with Greater London (4%), however lower than within Havering and London as a whole (6%).
Pregnancy and maternity	● **Havering has a General Fertility Rate (GFR) of 58.7 which is considerably higher than both Greater London (50.4) and England as a whole (51.9).** This indicates there are higher birthing levels within Havering.
Race and ethnicity	● The proportion of the population who belong to 'Other White' ethnic groups within the LIA (17%) is **considerably higher than within both Havering (7%) and England as a whole (6%)** and broadly in line with Greater London (15%) ● 9% of the population within the LIA are Black African, which is broadly in line with Greater London (8%), however **considerably higher than Havering (5%) and England as a whole (3%).** ● Overall, within the LIA 59% of the population have an ethnic minority background, which is slightly lower than Greater London (63%) however **considerably higher than proportions within the Borough (34%) and England as a whole (27%).**
Religion and belief	● The proportion of the population who are Christian within the LIA (48%) is lower than Havering (52%), however it is **considerably higher than the proportion in Greater London (41%).** The proportion is analysed to be broadly in line with England as a whole (46%). ● 12% of the population within the LIA are Muslim, which is **considerably higher than both Havering (6%) and England (7%),** however slightly lower than the proportion within Greater London (15%). ● Overall, 17% of the population within the LIA belong to minority religion groups, which is **considerably higher than the proportion within Havering (12%) and England (11%)** although considerably lower than the proportion for Greater London (25%).
Sex	● The ratio of men and women in the LIA is broadly in line with the proportion within the Borough (48% and 52% respectively) as well as the regional (49% male, 52% female) and national proportions (49% male, 51% female).
Sexual orientation	● The proportion of the population who are straight/ heterosexual within Havering (91%) is **considerably higher than within Greater London (86%)** however broadly in line with England as a whole (89%).

Protected Characteristic group	Comparison with Havering, Greater London and England
Socio-economic deprivation	● The proportion of working age population in employment within Havering (82%) **is considerably higher than figures within Greater London (75%) and England as a whole (76%).** ● The economic activity rate of 16–64-year-olds within Havering (82%) is **slightly higher than within Greater London (80%) and considerably higher than within England (79%).** This indicates high levels of employment within the Borough of Havering. ● The proportion of the population who reside within the most deprived quintile in the LIA (21%) is **considerably higher than within Havering (8%) and slightly higher than within Greater London (17%).** However, it is broadly in line with England as a whole (20%). Overall, 100% of the population within the LIA reside within the top four deprivation quintiles, which is **considerably higher than proportions within Havering (78%), Greater London (89%) and England (81%).** Therefore, data indicates that considerably high levels of deprivation exist within the LIA.

Source: ONS Census data 2021, ONS 2022, ONS Annual Population Survey 2023, ONS Census Population 2021, MHCLG 2019 Indices of Multiple Deprivation

4.2.2 Businesses

The LIA is home to the Bridge Close Industrial Estate, which spans an area of 1.41 hectares. Within the LIA, 1,055 businesses are located, of which the majority are shops/show rooms (364) and office workspaces (356).

The estate comprises commercial and light industrial buildings that are relatively low in value and density and is owned by multiple parties. Many of the businesses operating from the Site offer unique manufacturing, engineering, joinery, and printing services. Additionally, the estate has a range of other mixed uses, including religious activities. Many of the businesses employ locally and benefit from the central location and communication networks associated with a town centre site.

Figure 4.1: Businesses within the LIA



Source: OS AddressBase, 2025

Figure 4.1 above outlines that within the LIA the majority of businesses cluster towards the north east of the LIA. Following the extension of the RLB in 2024, there are 6 more businesses operating, taking the total number of businesses operating in the Sites to 26.

Site specific demographic data: Businesses

An update to the demographic survey undertaken by Mott MacDonald and JTL Research Ltd on behalf of the Council in June 2024 was undertaken in September 2024 to include the businesses located within the extension to the RLB.

As before, the objective of the survey was to build a better understanding of the demographics of businesses (owners, employees, and customers) that may be affected by the scheme. Questions were also asked in order to gauge respondents' awareness of the redevelopment process and how it might affect them, and to gain a better understanding of the potential needs in the area, in order to provide the appropriate support.

The fieldwork surveys were carried out with up to five visits made to each property understood to be occupied on the Site, including both residential properties and business properties. The survey included:

- a notification letter distributed to properties to make participants aware of the upcoming survey, including details for translation support;
- a letter distributed to properties with a unique link to the survey, to enable them to complete the survey in their own time; and

- in-person visits during day and evening hours, to encourage businesses to complete the survey on a tablet, with the option to complete this in another language.

Of the six businesses within the extended RLB, three participated in the survey.

Table 4.2 below provides a summary of business demographic findings that were highlighted in the survey results.

Table 4.2: Summary of Business Survey findings

Characteristic	Key findings
Connection to the scheme	● The survey found that 33% of the businesses were fully aware of the proposals and how it would affect them as a business.
Business type	● The survey found that 67% of businesses stated that their services were tailored to older people. ● The survey found that 100% of businesses had been operating on the Estate for between 1-5 years.
Age	● The survey found that 33% of business owners were between 25 and 34 years old, 33% were between 35 and 44 years old, and 33% were 45 to 54 years old. ● The survey found that, of employees accounted for, **the largest proportion of employees (58%) were between 25 and 34 years old.**
Disability	● The survey found that no business owners had a long-term health problems or disabilities. ● The survey found that none of the employees accounted for had a disability or long-term health condition.
Gender reassignment	● The survey found that 100% of business owners identified with the same sex registered at birth.
Marriage and Civil Partnership	● The survey found that 100% of business owners were married.
Pregnancy and maternity	● The survey found that 100% of businesses stated that none of their employees had been pregnant within the last 12 months.
Race	● The survey found that the **largest proportion of business owners (67%) were English/ Welsh/ Scottish/ Northern Irish/ British,** and 33% were Pakistani. ● The survey found that, of employees accounted for, 33% were Indian, 33% were Pakistani and 33% preferred not to say.
Religion and belief	● The survey found that 33% of business owners were Christian, 33% Muslim and 33% no religion.
Sex	● The survey found that 100% of business owners identified as male.
Sexual orientation	● The survey found that 100% of business owners identified as heterosexual.
Socio-economic status	● Not enough responses surrounding employees' eligibility/receipt of Universal Credit were collected to form an analysis.
Languages spoken	● The survey found that **the largest proportion of business owners preferred language was English (67%),** whilst 33% of business owners preferred using Urdu. ● The survey found that, of employees accounted for, **the largest proportion of employees (67%) preferred to speak in Urdu,** compared to 33% of employees who preferred to speak in English.

4.2.3 Residential properties

Within the LIA of the scheme there are a total of 4,544 residential properties. The highest proportion of which are self-contained flats, of which there are 3,255.

The figure below outlines the location of residential properties within the LIA. Residential properties are generally evenly spread throughout the LIA, however a cluster of houses within proximity forms to the east of the LIA.

Figure 4.2: Residential properties within the LIA



Source: OS AddressBase, 2025

4.2.4 Residential acquisition information: October 2025

In total, there are 37 residential properties identified within the Site. These dwellings are principally located at 95-147 Waterloo Road and 20-40 Oldchurch Road.

The table below outlines the current acquisition status of all residential interests, highlighting whether the interest holder of the property is the Council.

Table 4-3: Acquisition of residential interests

Acquisition status	Number of residential interests
London Borough of Havering is the interest holder	33
Acquisition with freeholder is still outstanding	5
Total	37

Source: London Borough of Havering: Bridge Close Land Assembly Schedule, March 2023

In total, the Council is the interest holder for 33 residential units. The majority of these properties (26) are currently used for temporary accommodation until a suitable, permanent Council property is identified. Three properties are secure social housing tenure, and the remaining three are managed by BCR LLP with private tenants.

The remaining five residential interests are all of a freehold tenure. The interests are a mix of owner-occupier and owner-investor (with private tenants) properties, with the Council still in discussion with the freeholder to come to an agreement as of October 2025.

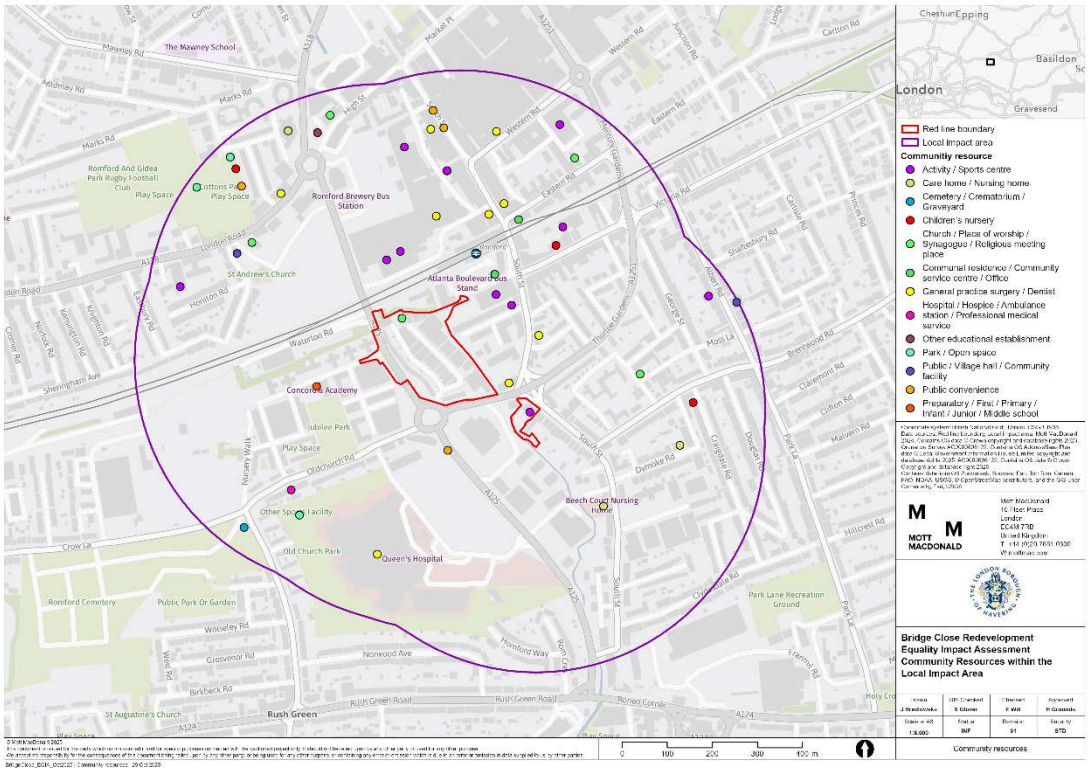
Residential survey findings further reported the tenure of respondents, which is outlined within Appendix E.

4.2.5 Community facilities

The figure below outlines the location of all community facilities within the LIA. There are a total of 58 community resources within the LIA, the majority of which are sporting/exercise centres (14) or General Practices (10).

The figure outlines that community resources within the LIA are spread out evenly within the LIA, with a high proportion of activity/sports centres operating within the LIA.

Figure 4.3: Community resources within the LIA



Source: OS AddressBase, 2025

In addition to the 26 businesses operating on Site, other commercial occupiers include the London Ambulance Service Station. Within the RLB, there is one community resource which is a religious meeting place, the HICC.

4.2.5.1 Religious Establishments

According to the Bridge Close Planning Statement with Framework Commercial Strategy (November 2023), there are several temporary and permanent faith and religious based organisations operating from existing buildings on the Site. These include HICC, as well as several other church-based organisations.

HICC currently own the Site and are operating as the only existing faith establishment that has planning permission for its operations as a place of worship.

Over time, a number of other faith groups have been operating from the Site with temporary planning permission, though this permission has now expired. For example, 9 Bridge Close has been occupied by The Redeem Christian Church, but upon its last inspection (February 2023) it was not clear whether the group were still active. In addition, 12 Bridge Close has in recent years been occupied by a number of faith groups including New Glory Ministry, Divine Worshippers Christian Ministries, House of Judah, Bethel Church of God, and the Payer House Church. However, the February 2023 inspection was unable to conclude whether the groups were still active. As a result, exact details around the current operation of faith and religion groups outwith the HICC on Site are unknown.

The Council are in dialogue with the identified faith groups, to work with them and provide assistance aimed at helping them successfully relocate.

4.2.5.2 Havering Islamic Cultural Centre

HICC is a valuable and long-established community facility which was established in 1982 to meet the religious needs of the local Muslim community, and the social and cultural needs of all local residents. It currently occupies a two-storey building and car park in the north-eastern corner of the Site, comprising accommodation 10,140 sq ft on a site of approximately 0.17 hectares. In February 2024, HICC submitted a formal objection to the planning application for the Site, outlined in Chapter 3, which has led to an agreement with the Council that it will be relocated to a new site at 222-226 South Street, now within the RLB.

4.2.6 Commercial acquisition information

The land assembly process will result in the purchase of a number of commercial interests, including both businesses and community resources. In total, 40 commercial interests have been identified on Site. These commercial occupiers include the London Ambulance Service Station, HICC, businesses and some vacant interests.

As shown in the table below, BCR LLP are currently the interest holder for 14 commercial interests on the original Site. Several of these are currently vacant units. The majority of commercial interests are currently leasehold/occupier status.

Table 4-4 Status of commercial interests

Commercial interest status	Number of commercial interests
Interest holder is Bridge Close Regeneration LLP (agreement either reached and exchanged and completed, or deferred completion)	14
Freehold / owner occupier	6
Freehold / investor owner	2

Commercial interest status	Number of commercial interests
Leasehold / occupier	16
Occupier	2
Total	40

Source: London Borough of Havering: Bridge Close Land Assembly Schedule, July 2024

Further to the table above, six further businesses are located within the South Street section of the RLB.

4.2.6.1 London Ambulance Service station

London Ambulance Service are currently the freeholders of 220 Waterloo Road (a circa 15,000 sq ft building). Romford Ambulance Station is the Group HQ and serves the communities, residents and visitors of the London Borough of Havering and Barking and Dagenham, which equates to an area of 92 sq miles and approximately 500,000 people.

Currently, the relocation options being considered for the London Ambulance Station include the ambulance station relocated to a new facility off-site (with direct assistance from the Council); the ambulance station relocated into a new facility off-site (with more limited assistance from the Council); or the ambulance station moved to a site enabling consolidation with one or more other local ambulance stations, with assistance from the Council as required.

A detailed site search for a relocation site for the London Ambulance Service Station has been conducted by the London Ambulance Service Station and the Council. All suitable relocation options are to be considered with a full feasibility study undertaken to appraise financial, operational and planning implications. However, to date, a suitable alternative location for the ambulance station, in accordance with the operational modelling and wider estate strategy, has not been found.

In March 2024, the London Ambulance Service submitted a formal objection to the planning application for the Site, which consisted of the following key objections:

- The Trust and the Healthcare System have confirmed that there are no funds available to apply to any reprovision of the facility.
- A review of the planning application has been undertaken, and it is noted that the Romford Ambulance Station falls within the red line boundary of the planning application; however, the application does not include the reprovision of the ambulance station within the proposed scheme, nor does it seek to secure an alternative location.
- Loss of the existing ambulance station is contrary to policy, has not been assessed in the submitted planning assessment, and will have a detrimental impact on patient healthcare.

4.2.7 2025 discussions

Whilst there are no plans to change the planning application, the Council is engaging with the NHS regarding the plans for the LAS site. Plans under consideration include temporarily retaining the London Ambulance Service on site before it is relocated elsewhere.

As outlined in the Planning Application, the provision for a new health centre on site to replace the existing health provision in the local area is dependent on the requirements of the NHS.

Local property consultants have established that there is capacity within the local primary care system to cater to the needs of the new residents, and the NHS are also considering their requirements. As part of the ongoing discussions, the NHS have reiterated that they would accept financial compensation to go towards acute care and primary care mitigation. The Planning Application allows for this; consent was also granted for alternative uses of the planned clinic space.

5 Summary of evidence review

5.1 Existing published evidence

This section of the assessment presents the potential impacts of the proposed scheme in relation to protected characteristic groups as identified in the 2010 Equality Act. These findings have been drawn predominantly from wider literature and using professional judgement and show where groups may be disproportionately or differentially affected, prior to consideration of any mitigation measures in place.

Key potential impacts that have been identified are presented in this chapter, with a detailed literature review provided in Appendix C. A full assessment of potential equality effects, based on the risks and opportunities identified below, is provided in Chapter 6.

5.1.1 Impacts on residents and community resources

Redevelopment schemes often result in the relocation of residents, sometimes using CPO powers. Community resources are also often relocated and may be forced to close if no alternative premises can be found. The loss of social infrastructure, community links and sudden changes in settlements may cause community severance - a social disconnect felt from an individual towards their community after a period of sudden change.

5.1.1.1 Health effects associated with relocation

There is a risk to all relocated residents of adverse effects on their mental health and wellbeing, as the process of moving home can cause mental and emotional stress, especially when it is involuntary. Moving home is widely acknowledged to be one of the most stressful events in an individual's life.[16] The stress can be more challenging for some protected characteristic groups. Groups that are particularly vulnerable to relocation include:

- children;
- older people;
- disabled people;
- people from ethnic minority backgrounds; and
- pregnant people.

5.1.1.2 Loss of social cohesion associated with relocation

Relocation may result in a loss of social cohesion for residents. Any increase in the distance of residents from family, friends, or places of social connection (such as community centres or schools) can trigger this. This can impact all sections of the community, but may have a disproportionately negative effect on the following groups:

- children;
- older people;
- disabled people;
- pregnant people;
- people from ethnic minority backgrounds; and

[16] UK Parliament, House of Commons Library (2022): *'Improving the home buying and selling process in England'*

- people from minority faith groups.

5.1.1.3 Access to affordable housing

The need for relocation may mean that accessing affordable housing might be difficult. This is particularly due to the rise in the cost of home ownership in both London and England. This may have a disproportionately negative effect on the following groups:

- young people;
- women;
- disabled people; and
- LGBTQ+ people.

5.1.1.4 Access to appropriate and accessible housing

The loss of property as a direct result of the redevelopment may negatively affect various protected characteristic groups. Residents may be impacted by the affordability and quality of housing available in the area to which they relocate. Protected characteristic groups that are particularly vulnerable to potential changes in this area are:

- children; and
- disabled people.

5.1.1.5 Health and wellbeing of the local population

In the construction phase, redevelopment can cause changes in levels of noise and air pollution. Both poor air quality and excessive noise exposure have been linked to several adverse health outcomes for various protected characteristic groups, as they can be more vulnerable to the negative healthcare outcomes which occur as a result. Protected characteristic groups that are particularly vulnerable to such environmental potential changes due to redevelopment are:

- children and young people;
- older people;
- disabled people; and
- pregnant people.

5.1.1.6 Access to finance as a result of relocation

Redevelopment often requires residents to relocate. Residents who do not have a right to return to sites after redevelopment has taken place have to find long-term housing, and residents who do return to an Estate could face increased costs in their home. Access to finance is likely to be problematic for those at risk of financial exclusion, and those who experience issues accessing the appropriate mainstream financial services associated with relocation, such as bank accounts, mortgages and loans. Protected characteristic groups that are particularly vulnerable to these changes are:

- young people not in employment;
- older people;
- disabled people;
- women;
- people from ethnic minority backgrounds; and
- lone parents.

5.1.1.7 Expenses associated with relocation

Relocation of residents can lead to an increase in financial outgoings due to the costs associated with moving and obtaining new housing. Such expenses are likely to be problematic for those at risk of financial exclusion. Protected characteristic groups that are particularly vulnerable to these changes are:

- young people;
- older people;
- disabled people;
- people from ethnic minority backgrounds; and
- women

5.1.1.8 Loss of community resources

Redevelopment can result in the closure and/or relocation of existing community resources that are operating on the site. Any loss in access to these community resources due to closure or relocation away from the area can contribute to feelings of isolation and loneliness amongst local people. This is particularly the case where essential services, such as education and healthcare institutions, are lost. This may have adverse effects for a number of groups, including:

- children;
- older people;
- disabled people; and
- people from faith groups.

5.1.1.9 Emergency service response reconfiguration

As a result of redevelopment, the reconfiguration of local emergency service response time may be altered. Research has found that the relocation of ambulance stations can temporarily lead to a reduction in quality of service,[17] increasing the length of time it takes patients to reach a hospital, and ultimately the amount of negative health outcomes. Protected characteristic groups that are particularly vulnerable to these changes are:

- children;
- older people; and
- disabled people.

5.1.2 Impacts on business

5.1.2.1 Potential loss of business

Redevelopment can lead to the possible loss of businesses if alternative units of an appropriate nature cannot be identified. As a result, redundancies are likely to occur. Business closure is particularly likely to impact those who are self-employed. Protected characteristic groups that are particularly vulnerable to these changes are:

- older people; and

[17] Van Barneveld. (2016): 'The effect of ambulance relocations on the performance of ambulance service providers'

- people from ethnic minority groups.

5.1.2.2 Redundancy due to loss of businesses

Redevelopment can lead to the possible loss of businesses if alternative units of an appropriate nature cannot be identified. As a result, redundancies are likely to occur. Business closure is particularly likely to impact those who are self-employed. Protected characteristic groups that are particularly vulnerable to these changes are:

- older people; and
- people from ethnic minority groups.

5.1.2.3 Financial implications associated with business relocation

As mentioned previously, redevelopment of sites can result in business relocation or closure. With both outcomes, access to finance is a requirement. The loss of an existing customer base due to relocation is also likely to negatively impact the financial position of business owners due to a loss of custom. Protected characteristic groups that are particularly vulnerable to changes in this area are:

- older people;
- disabled people; and
- people from ethnic minority groups.

5.1.2.4 Impact of redundancy on health and wellbeing

As noted above, redevelopment has the potential to result in business closure. This may lead to staff redundancies as a direct result of the redevelopment scheme, consequently causing negative health and wellbeing effects. Protected characteristic groups that are particularly vulnerable to these changes are:

- children and young people;
- older people; and
- people from ethnic minority groups.

5.1.2.5 Impact on customer base

Any loss of a business would result in the loss of service delivered to existing local consumers. Certain groups may be more reliant on existing networks and links to local businesses, and, as a result, changes in business locations could reduce their access to services.

In addition, with the announcement of a redevelopment scheme, local businesses may start to relocate out of the redevelopment sites. This may reduce the availability and choice of services for vulnerable protected characteristic groups that find it harder to access services and amenities that may be located further away.[18] Protected characteristic groups that are particularly vulnerable to the possible loss of businesses are:

- older people;
- disabled people; and
- people from ethnic minority backgrounds.

[18] London Tenants Federation, L. Lees, Southwark Notes Archive group (2014): 'Staying put: an anti-gentrification handbook for council estates in London'

5.1.3 Wider regeneration impacts

5.1.3.1 Improved housing provision

The redevelopment of sites often results in an improved quality of housing. Research has found that in London, regeneration is likely to improve the quality and availability of housing, whilst allowing the addition of new affordable housing to existing stock.[19] The development of new housing presents an opportunity to provide well-designed, accessible, energy-efficient homes for residents. Redevelopment also provides opportunities to resolve issues that have been apparent in the existing housing stock, such as damp, overcrowding, disrepair and high maintenance costs.[20] Protected characteristic groups that are particularly vulnerable to these changes are:

- children and young people;
- older people;
- disabled people; and
- people from ethnic minority groups.

5.1.3.2 Affordable housing provision

The need for residents to resettle as a result of redevelopment can lead to an increase in financial outgoings due to costs associated with moving and obtaining new housing. Those who face such financial challenges are therefore the most likely to benefit from the presence of affordable housing as a result of redevelopment. The groups that are most likely to face benefit from such housing provision are:

- young people;
- women;
- disabled people; and
- LGBTQ+ people.

5.1.3.3 Provision of upgraded religious facilities

Places of worship provide important places of social connection and promote wellbeing for various protected characteristic groups, particularly those belonging to that faith. Literature points to the importance of religious places of worship in helping generate solidarity, manage adversity and promote resilience amongst religious communities.

The groups most likely to be impacted by this provision are:

- people from minority faith groups;
- children;
- older people; and
- people from ethnic minority backgrounds.

[19] LSE Housing and Communities (2016): *'Estate regeneration and community impacts: Challenges and lessons for social landlords, developers and local councils'*. Available at: http://sticerd.lse.ac.uk/dps/case/cr/casereport99.pdf

[20] Lambeth Council (2017): 'I*nvesting in better neighbourhoods and building the homes we need to house the people of Lambeth – Central Hill*'. Available at: https://moderngov.lambeth.gov.uk/documents/s87425/Cabinet%20Report%20%20Central%20Hill%20-%20March%202017%20-%20final%20clean%204%20RD.pdf

5.1.3.4 Provision of community facilities

Community resources provide important places of social connection and promote wellbeing for various protected characteristic groups. Redevelopment of areas can include both continued access to and the creation of community resources, improving social cohesion and community relations. Additions of facilities such as schools, nurseries and healthcare facilities will likely directly benefit the following protected characteristics:

- children;
- older people; and
- people from ethnic minority backgrounds.

5.1.3.5 Safety and security

Once redevelopment has been confirmed, properties on redevelopment sites due to be demolished can fall empty become subject to disrepair and decay. Vacant properties can lead to increased vandalism, arson, break-ins, and other damage to neighbouring homes and businesses.[21]

However, possible improvements made to the public realm and management of sites during redevelopment can reduce crime and in turn have a positive effect. Protected characteristic groups that are particularly vulnerable to safety and security risks are:

- people from ethnic minority backgrounds;
- younger people;
- disabled people; and
- LGBTQ+ people.

5.1.3.6 Employment opportunities

Redevelopment provides an opportunity to include additional commercial space and, in turn, leads to employment opportunities for those living locally. Job creation is likely to occur through the provision of workspaces, encouraging businesses to move into the redeveloped sites. The following protected characteristic groups are expected to disproportionately benefit from employment opportunities because of redevelopment:

- young people;
- older people;
- disabled people;
- men; and
- people from ethnic minority groups.

5.1.3.7 Improved public realm and provision of urban green space

In general, modern developments are likely to reflect current trends and prevailing theories in best design practice.[22] This provides an opportunity to improve on outdated designs and the layout and landscaping of public open space, increasing the ability to access and use the public realm. Research shows that public realm is important in ensuring that residents interact with

[21] Power, A. (2010): '*Housing and sustainability: demolition or refurbishment*?' Available at https://uk-air.defra.gov.uk/assets/documents/reports/cat14/1406191156_060618_Guide_to_UK_Air_Pollution_Information_Resources-issue_2-FINAL.pdf https://www.icevirtuallibrary.com/doi/abs/10.1680/udap.2010.163.4.205

[22] LSE Housing and Communities (2016): '*Estate regeneration and community impacts: Challenges and lessons for social landlords, developers and local councils'*. Available at: http://sticerd.lse.ac.uk/dps/case/cr/casereport99.pdf

their environment and feel as if they are active members of their society.[23] Protected characteristic groups that are likely to benefit from these changes are:

- children;
- older people;
- women;
- disabled people; and
- people from ethnic minority backgrounds.

5.1.3.8 Provision of community facilities

Community resources provide important places of social connection and promote wellbeing for various protected characteristic groups. Redevelopment of areas can include continued access to and the creation of community resources, improving social cohesion and community relations. Additions of facilities such as schools, nurseries and healthcare facilities will likely directly benefit the following protected characteristics:

- children;
- older people; and
- people from ethnic minority backgrounds.

5.2 Resident and business engagement

As highlighted in section 4.1.1.2 of this assessment, in June 2024, JTL Research and Mott MacDonald conducted a survey to better understand the views of residents and businesses affected by the scheme. The survey asked questions to gauge respondents' awareness of the redevelopment process and how it might affect them, and to gain a better understanding of the potential needs in the area, in order to provide the appropriate support. Responses to these questions are covered in Appendix E of this report.

5.2.1 Engagement findings: Residential

The survey asked residents for their opinions on how the scheme would impact their households. A total of 12 households responded to the survey. A breakdown of survey findings highlighted the following key points:

- eight (67%) households stated that the redevelopment would have a negative impact upon their health and wellbeing, whilst one (8%) household stated it would have a positive impact;
- five (42%) households stated the redevelopment would have no impact upon access to childcare/school provision;
- eight (67%) households stated the redevelopment would have no impact upon the employment and skills needs within the household; three (25%) households stated it would have a negative impact, and one (8%) household stated it would have a positive impact.

Within the survey, all households were given the option of discussing equalities matters further in a telephone interview with Mott MacDonald at a later date. However, no households responded to this opportunity.

[23] A single authoritative definition of green and open space does not exist, for this report, green space refers to green, blue and open spaces that border the urban infrastructure such as parks, forests, street trees, squares, playing fields, river corridors and greenways. WHO (2016): 'Urban green spaces and health: A review of evidence'

5.2.2 Engagement findings: Businesses

The survey asked businesses about how the scheme would impact the operation of their business. A total of 10 businesses responded to the survey. A breakdown of the survey findings highlighted the following key points:

- 60% of businesses were fully aware of the proposals and how they would affect them as a business;
- 20% of businesses stated their services were tailored to older people;
- seven (70%) businesses stated they were very concerned about the impact of the redevelopment upon their business
- two (20%) businesses stated they were fairly satisfied with the level of communication from London Borough of Havering Council about the redevelopment
- two (20%) businesses stated they were very satisfied with the level of communication from London Borough of Havering Council about the redevelopment
- three (30%) businesses stated they were very dissatisfied with the level of communication from London Borough of Havering Council about the redevelopment

Within the survey, all businesses were given the option of discussing equalities matters further in a telephone interview with Mott MacDonald at a later date. However, no businesses responded to this opportunity.

5.2.3 Business Application Position Statements

Both the London Ambulance Service and HICC published position statements based upon planning objections received in relation to the redevelopments at Bridge Close.

5.2.3.1 London Ambulance Service

Key points raised:

- The planning application does not propose a direct reprovision of the LAS building as an area on site would be needed for the storage and maintenance of ambulances.

5.2.3.2 HICC

- Loss of Existing Facility: The proposed redevelopment will result in the demolition and complete loss of the Havering Islamic Cultural Centre (HICC) without confirmed plans for reprovision. Community Impact: The HICC is a vital religious, cultural, and community facility. The loss of this facility without a detailed and workable mechanism for reprovision is contrary to planning policy, human rights, and equality duties.
- Insufficient Reprovision Plans: The applicant's revised plans do not provide realistic, viable, or achievable options for the reprovision of HICC. The potential temporary solutions mentioned are not confirmed and lack confidence.
- Phasing Issues: The current phasing plan would cause a loss of social infrastructure and an interruption to the function of the HICC, which is contrary to planning policies.
- Fire Safety Concerns: The Phase 1 works would remove the only means of escape from a nearby building, rendering it non-compliant from a fire safety perspective.
- Inadequate Temporary Solutions: The proposed temporary solutions for HICC within the development are not realistic due to limitations in location, scale, height, and mass.

- Off-Site Relocation Uncertainty: The potential off-site relocation is not certain as it is still in early planning stages with many unresolved issues.
- Legal and Policy Compliance: The application fails to comply with planning policies, human rights, and equality duties. The lack of confirmed reprovision plans makes the application fundamentally flawed.
- Meaningful Engagement: The applicant has not engaged meaningfully with HICC to address its specific needs and requirements. The design of the scheme has not been amended to reflect HICC's comments.

6 Impact assessment

6.1 Overview

This chapter summarises the potential effects of the Bridge Close redevelopment on residents, business owners, employees and other stakeholders associated with the Site, specifically in relation to their protected characteristics. The chapter uses the demographic data of the Site and its surrounding area to identify which protected characteristic groups are at risk of being disproportionately or differentially affected by the scheme. Mitigation measures put forward by the Council have been evaluated to determine their effectiveness in minimising negative impacts that may arise.

To enable the demolition and construction phases of the scheme to proceed, all residents, businesses and community facilities located within the Site will be required to relocate. Those facing involuntary relocation may include vulnerable groups that could be disproportionately or differentially affected compared to other sections of the general population. This will be considered during the assessment.

6.1.1 Impacts on residents and community resources

Table 6-1 Impact Assessment – residents and community resources

Potential equality effect	Existing mitigation and/or enhancement measures	Recommendations	Overall impact
Health effects associated with relocation: The redevelopment will result in the relocation of all residents. For the demolition and construction phases of the scheme to proceed, all residents living in the existing 37 properties will be required to relocate. As of October 2025, the Council is the interest holder for 32 residential units, the majority of which (26) are currently used for temporary accommodation until a suitable, permanent Council property is identified. The remaining five residential	Documents reviewed within Appendix D outline the following measures that would provide mitigation against associated health effects or enhance the benefit of them. The council will ensure that: ● Council tenants will move no more than two times during the housing relocation process. ● Council tenants will be matched with suitable re-housing options that become available and best meet their housing needs. The Council will offer tailored advice on the suitability of each re-housing option.	To manage any residual health impacts, it is recommended that the Council: ● prevent moves which necessitate an involuntary school change for children.	There may be adverse impacts on groups with protected characteristics due to the impacts on health caused by relocation within the borough. There is the potential for disproportionate adverse equality effects on children and ethnic minority groups who are overrepresented both on Site and in the LIA. Overall, groups likely to impacted therefore include **children, older people, disabled people, those from an ethnic minority background and pregnant people**.

Potential equality effect	Existing mitigation and/or enhancement measures	Recommendations	Overall impact
interests are all of a freehold tenure. The interests are a mix of owner-occupier and owner-investor (with private tenants) properties, with the Council still in discussion with the freeholders to come to an agreement. Home relocation can lead to stress and anxiety around loss of access to community resources and a consequential loss of social cohesion This stress has been attributed to the anticipation of disruption, extra costs for residents and undermining of community stability and support networks. This can disproportionately impact children, older people, disabled people, those from an ethnic minority background and pregnant people. On Site, there is also a high proportion of children (39%) and ethnic minority groups (60%). The LIA also includes higher than average proportions of children (23%) and individuals from an ethnic minority background (62%). The GFR (58.5) is also considerably higher within the LIA which indicates disproportionately high birthing rates. Furthermore, these groups are likely to be disproportionately impacted by any changes.	• Owner occupiers will be provided with a dedicated Housing Officer to help throughout the move process. • Advice will be provided for all tenants – including owner occupiers and private renters - on access to local amenities to help households access local support services and schools. • There is an aim to move vulnerable residents together where possible, to maintain and stabilise existing support networks. • Each household has a dedicated Council Officer to help with each step of the re-housing process. The Council Officer is able to identify any additional support such as packing and unpacking services. • Support liaising with other services (such as schools, social services and health services) to support households at the new address.		With consideration that the Council has taken all reasonable measures to manage the impact, overall, if the proposed recommendations are implemented, there is likely to be a **limited residual adverse** effect on people with protected characteristics as a result of the health effects associated with relocation, both for the whole Scheme, and in the event of the CPO being used.
Loss of social cohesion associated with relocation: The Scheme will require current residents to temporarily or permanently relocate in order to facilitate the new development. This could increase the distance of residents from family, friends, or places of social connection, such as community	Documents reviewed within Appendix D outline the following measures that would provide a mitigation against associated losses to community cohesion or enhance the benefit of them. The council will ensure that:	To manage any residual health impacts, it is recommended that the Council: • prevent moves which necessitate an involuntary school change for children.	There may be adverse equality impacts on groups with protected characteristics as a result of relocation and the potential loss of social cohesion. There is the potential for disproportionate adverse equality effects on **children and ethnic minority groups** who are

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Potential equality effect	Existing mitigation and/or enhancement measures	Recommendations	Overall impact
centres or schools. Relocation may therefore result in a loss of social cohesion for residents. This can impact all sections of the community, but may have a disproportionately negative effect on children, older people, disabled people, people who are pregnant, people from ethnic minority backgrounds and people from minority faith groups. On Site, there is a high proportion of children (39%), ethnic minority groups (60%) and minority faith groups (57%). The population of the LIA also includes higher than average proportions of children (23%), individuals from an ethnic minority background (62%) and individuals from minority faith groups (18%). The GFR (58.5) is also higher within the LIA which indicates disproportionately high birthing rates. Furthermore, these groups are likely to be disproportionately impacted by any changes.	• Council tenants will move no more than two times during the housing relocation process. • Council tenants will be matched with suitable re-housing options that become available and best meet their housing needs. The Council will offer tailored advice on the suitability of each re-housing option. • Advice will be provided on access to local amenities to help households access local support services and schools. • A continuous communication process will ensure that residents feel included through briefings, letters and one on one meetings. • There is an aim to move vulnerable residents together where possible, to maintain and stabilise existing support networks. • The housing team inspects all properties on acquisition prior to rehousing taking place, with remedial works taking place where necessary, to ensure appropriate provision of accommodation. • It visits the tenant after re-housing and make additional changes to meet individual needs where necessary. • Support liaising with other services (such as schools, social services and health services) to support households at the new address.		overrepresented both on Site and in the LIA. There may be a differential adverse impact on **children, older people, disabled people, pregnant people, people from ethnic minority backgrounds, and people from minority faith groups.** With consideration that the Council has taken all reasonable measures to manage the impact, overall, if the proposed mitigations are implemented there is likely to be **limited adverse effects** on groups with protected characteristics, both for the overall redevelopment, and if the CPO is used.
Access to affordable housing:	Documents reviewed within Appendix D outline the following measures that would	Rental fees and service charges for proposed new properties on Site should	There is the potential for adverse equality impacts on groups with protected

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Potential equality effect	Existing mitigation and/or enhancement measures	Recommendations	Overall impact
The Scheme has the potential to impact upon access to affordable housing for residents. All existing residents will be required to relocate once their properties have been acquired by the Council. This relocation will take place either voluntarily or via the Council's CPO. The need for residents to relocate can cause difficulty in accessing affordable housing, particularly given the increasing cost of home ownership in both London and England more widely. Young people, women, disabled people, and LGBTQ+ people are most likely to face financial issues when securing alternative housing. On Site, there is a high proportion of women (62%). However, none of the above groups are over-represented in the LIA.	provide a mitigation against associated losses in affordable housing. The council will ensure that: ● Housing Needs Assessments are available or those who require support with sourcing and paying for suitable and affordable rented accommodation. A qualifying resident is entitled to receive the minimum home loss payment. ● Disturbance compensation is paid where qualifying residents are required to leave their home, to compensate for reasonable financial costs associated with moving and acquiring a new home. ● Home loss payments (which differ depending on the tenant) are provided - a council tenant is eligible for £8,100 home loss payment and can put forward for a disturbance compensation. For council tenants who will lose their property as a result of the regeneration scheme, the Council outlines the following available options: ● Move to an existing Council property elsewhere within the borough ● Move to an existing Housing Association property elsewhere within the borough ● Move to a sheltered housing or extra-care scheme property elsewhere within the borough (subject to eligibility for the particular scheme)	be shared with the local community as far in advance of scheme operation as possible.	characteristics as a result of access to affordable housing. There may be differential impacts on **young people, women, disabled people and LGBTQ+ people.** There is also the potential for disproportionate adverse equality effects on **women** who are overrepresented on Site. With consideration that the Council has taken all reasonable measures to manage the impact, overall, if the proposed mitigations are implemented there is likely to be **some residual adverse impacts** as a result of access to affordable housing.

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Potential equality effect	Existing mitigation and/or enhancement measures	Recommendations	Overall impact
	• Purchase an affordable home elsewhere through a low-cost home ownership scheme • Rent a property elsewhere with a private landlord • Move to a new property in the development once complete For private tenants who will lose their property as a result of the regeneration scheme, the Council states that it is committed to offering relevant support to enable affected tenants to find a replacement home. The Council aims to: • ensure private tenants and their landlords receive regular, open communication about the redevelopment and estimated timescales; and • assist private tenants to find alternative suitable private rented accommodation through Housing Options and Advice Service. For owner occupiers, the Council advises to sell the property either to the Council or on the market and purchase a property elsewhere or on the Site once the regeneration is completed. However, during this process owner occupiers will have a dedicated Housing Officer to help throughout the move process who will meets with them on a one-to-one basis to explain their options, understand their requirements and answer any questions.		
Access to appropriate and accessible housing:	Documents reviewed within Appendix D outline the following measures that provide mitigations against adverse effects and enhance access to appropriate and	This risk requires further management, for which the Council should consider the following recommendations:	There is potential for adverse equality effects on groups with protected

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Potential equality effect	Existing mitigation and/or enhancement measures	Recommendations	Overall impact
The Scheme has the potential to impact upon access to appropriate and accessible housing for residents. All existing residents will be required to relocate once their properties have been acquired by the Council. This relocation will take place either voluntarily or via the Council's CPO. Evidence from the literature review has found that relocation can result in challenges finding suitable housing that meet the needs of all residents. For example, housing may need to be sourced for disabled people (in particular those with mobility impairments) who may require adaptations to their home. Those with children are also likely to require housing that ensures overcrowded living conditions will not arise. On Site, there is a large proportion of children (39%). There is also a high proportion of children (23%) within the LIA.	accessible housing. The council will ensure that: ● It assists residents with additional independent advice and support on the re-housing process, outside of that offered by the Council, and details on how to access these when requested. ● It carries out one-to-one meetings with Council tenants in order to assist with completing the correct forms and to establish the needs of residents. As part of this process, the Council considers the tenant's rehousing preferences with regards to location, bed size requirement, desire to be close to friends and family, health needs (mobility or social risk factors), children's school location and place of employment. ● It is committed to providing better quality housing that meets individual needs.	● The Council should continue to communicate proactively with residents through a range of channels, including face-to-face engagement where possible, keeping up-to-date records of changing needs and circumstances, particularly those who are most affected by a change to accessible and appropriate housing such as families with children.	characteristics linked to potentially unsuitable housing. There may be differential impacts on **children and disabled people**. There is also the potential for disproportionate adverse equality effects on **children** who are overrepresented on Site and in the LIA. With consideration that the Council has taken all reasonable measures to manage the impact, overall, if the proposed recommendations are implemented, there is likely to be only a **very limited adverse effect** on residents with protected characteristics linked with access to appropriate and accessible housing.
Health and wellbeing of the local population: Construction of the Scheme has the potential to result in health effects for local residents. Environmental effects of demolition and redevelopment can impact both air and noise pollution levels. As set out in the literature review, groups more likely to be impacted by and changes in air and noise pollution levels are children, young people, older people, disabled people, and pregnant people. On Site, there is a large proportion of children (39%). There is also a high	Documents reviewed within Appendix D outline the following measures that will provide a mitigation against adverse health and wellbeing effects to the local population. The council will ensure that: ● Commit to the continued maintenance of each Council residential housing estate to a high standard throughout the period of the regeneration scheme, keeping noise and disruption of building work at a minimum and maintaining site security for the safety of residents.	To manage any residual health impacts, it is recommended that the Council: ● Ensure the appointed contractor implements the proposed mitigation measures as set out in the Environmental Impact Assessment. It should be ensured that information on these mitigations is made available to the public, in particular local residents. ● Ensure the CEMP follows best practice mitigation for changes in air quality and noise including vehicle movement limitations, damping down,	If the proposed recommendations are implemented, there is likely to be **no adverse effect** on groups with protected characteristics as a result of changes in noise and air quality. This is due to the Scheme's environmental assessment concluding that no significant adverse effects are likely to arise with appropriate mitigation measures in place.

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Potential equality effect	Existing mitigation and/or enhancement measures	Recommendations	Overall impact
proportion of children (23%) within the wider5 LIA. The GFR (58.5) is also higher within the LIA which indicates disproportionately high birthing rates. However, results from the Environmental Impact Assessment demonstrated that it is unlikely that any significant noise or air quality effects will arise during both construction and operation periods, should appropriate mitigation be put in place.[24]	• The contractor is obligated by law to develop a Construction Environmental Management Plan (CEMP) to mitigate the impacts of demolition and construction on local resident	anti-idling, noise bunds, hoarding and screening. • Any environmental monitoring reports should be shared with local residents for transparency.	
Access to finance as a result of relocation: As a result of the need to relocate, residents will be required to access new means of finance to accommodate the relocation. Should access to additional finances (such as loans or mortgages) be necessary as a result of the relocation, those at risk of financial exclusion are more likely to be negatively impacted. Financial exclusion arises when an individual faces difficulty when trying to access appropriate and mainstream financial services. In the UK, young people not in employment, lone parents, disabled people, women, ethnic minority groups and older people are more likely to experience barriers in accessing additional finances. On Site, there is a large proportion of children (39%), ethnic minority groups (60%) and women (62%). The population of the LIA also has higher than average proportions of children (23%) and	Documents reviewed within Appendix D outline the following measures that will provide mitigation against any adverse changes to access to finance. The council will ensure that: • Home loss payments made to those whose homes are not acquired through CPO are made at the discretion of the Council, as it has no statutory duty to make the compensation in cases of private treaty. However, in order to provide support to those whose homes are acquired under agreement, the Council will offer a home loss payment in these cases as well.	This risk requires further management, for which Council should consider the following recommendations: • The Council should continue to communicate proactively with residents through a range of channels, including face-to-face engagement where possible, keeping up-to-date records of changing needs and circumstances– particularly those who are most affected by financial exclusion.	There is the potential for adverse equality impacts on groups with protected characteristics as a result of accessing finance. Differential effects are likely to impact **young people, older people, disabled people, lone parents, ethnic minority groups and women.** There is also the potential for disproportionate adverse equality effects on **ethnic minority groups** who are overrepresented both on Site and in the LIA. **Women** are also overrepresented on Site. With consideration that the Council has taken all reasonable measures to manage the impact, overall, if the proposed mitigations are implemented there is likely to be **some residual adverse impacts** as a result of accessing finance.

[24] Savills (2023): 'Planning Statement with Framework Commercial Strategy – Bridge Close, Romford'.

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Potential equality effect	Existing mitigation and/or enhancement measures	Recommendations	Overall impact
individuals from ethnic minority backgrounds (62%).			
Expenses associated with relocation: As a result of needing to relocate, residents are likely to be faced with costs associated with moving. Costs associated with relocation are particularly likely to impact those who are more likely to be low income and therefore have less spare income. Research suggests that young people, older people, disabled people, ethnic minority groups, and women are more likely to be classed as low income. On Site, there is a large proportion of ethnic minority groups (60%) and women (62%). There is also a high proportion of and ethnic minority groups (62%) within the LIA.	Documents reviewed within Appendix D outline the following measures that will provide mitigation against any adverse changes to access to finance. The council will ensure that: ● Disturbance compensation is paid where qualifying residents are required to leave their home, to compensate for reasonable financial costs associated with moving and acquiring a new home. The aim of the compensation is to prevent a resident from encountering a situation where they are in a worse financial position as a result of having to move because of the regeneration programme.	This risk requires further management, for which Council should consider the following recommendations: ● The Council should continue to communicate proactively with residents through a range of channels, including face-to-face engagement where possible, keeping up-to-date records of changing needs and circumstances– particularly those who are most affected by expenses associated with relocation.	There is the potential for adverse equality impacts on groups with protected characteristics as a result of accessing finance. Differential effects are likely to impact **young people, older people, disabled people, ethnic minority groups and women.** There is also the potential for disproportionate adverse equality effects on **ethnic minority groups** who are overrepresented both on Site and in the LIA. **Women** are also overrepresented on Site. With consideration that the Council has taken all reasonable measures to manage the impact, overall, if the proposed mitigations are implemented there is likely to be **some residual adverse impacts** as a result of expenses associated with relocation.
Loss of community resources: The Scheme will result in the closure and relocation of existing community resources that are currently operating on the Site. This includes the unofficial use of some premises as religious facilities, a fitness centre, and a medical practice. The closure or relocation of these community facilities has the potential to disadvantage local communities. Any loss in access to these community resources due to closure or relocation away from the Romford area may have adverse effects for a number of groups,	Relevant documents are reviewed within Appendix D of the Bridge Close Redevelopment EqIA and outline the following measures that would provide a mitigation against associated losses to community resources or enhance the benefit of them. The Council will ensure that: ● A continuous communication process will ensure that residents feel included through briefings, letters and one on one meetings. ● The Council and Ardent are working with HICC to ensure that the service it	To maintain residual impacts, it is recommended that the Council: ● offer support to community resources through ongoing engagement and consultation on a case-by-case basis, aiming to address any specific needs and equality concerns; ● help to relocate and maintain community resources in the local area where possible, so as to prevent disruption of social networks and access to services; and maintain access to community resources	There is the potential for some adverse impacts on groups with protected characteristics due to loss of social cohesion and access to community resources. The loss of community resources will likely have a disproportionate effect on **Muslims** (12% of the population) due to their representation in the LIA. Differential impacts apply to disabled **people, older people, children and those from religious and faith groups (in particular the Muslim community).**

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Potential equality effect	Existing mitigation and/or enhancement measures	Recommendations	Overall impact
including disabled people, older people, children and those from the affected religious and faith groups. The loss of community resources to maintain social links can contribute to feelings of isolation and loneliness in older people and disabled people. Demolition and resource relocation could also adversely affect access to child social networks. The population of the LIA is disproportionately represented by individuals from minority ethnic and religious groups, with 12% of the population being Muslim.	provides will not be interrupted; and HICC will only be required to move from the majority of its existing premises when the final phase of the Scheme is implemented. ● The Council are working with the faith groups operating unofficially out of Bridge Close premises to support them to successfully relocate.	throughout the land assembly process for as long as possible.	Overall, if the proposed recommendations are implemented, these effects can be further managed. However, there may be a **residual adverse effect** on groups with protected characteristics.
Emergency Service response reconfiguration: The Romford Ambulance station is located at the south east corner of the Site. The redevelopment will cause a reconfiguration of emergency service response for Queens and Victoria Hospital in Romford. An action plan to determine future configuration of emergency response has yet to be delivered. It is, however, possible that the relocation of Romford Ambulance station may reduce the efficiency of local emergency service response. This may impact those who have a differential need for emergency services, identified in the evidence review as older people, disabled people and children. The population of Havering has a higher than average proportion of older people (18%) when compared to the regional average (12%).	Documents reviewed within Appendix D outline that there is ongoing engagement with Romford Ambulance Station to accommodate its relocation to a suitable premises. ● Numerous options have been made available to the ambulance station including relocation to a new site with assistance from the Council and possibly moving to a new site that allows for consolidation with one or more other ambulance stations. ● A detailed site search for a relocation site for the London Ambulance Service Station will be conducted by the London Ambulance Service Station and the Council. Should new sites become available, suitable options will be considered with a full feasibility study being undertaken to appraise financial, operational and planning implications.	The proposed outcome for the future configuration of the Ambulance station should be shared with the local community as far in advance of scheme operation as possible.	With consideration that the Council has taken all reasonable measures to manage the impact, overall, if the proposed relocation causes a change in emergency service response time, there may be **residual adverse effects** on groups with protected characteristics with a differential need for this service including **children, older people and disabled people**. These changes may also negatively impact older people who are disproportionately representative in the borough of Havering (18% of the population).

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6.1.2 Impact on businesses and employees

Table 6.2: Impact assessment -businesses and employees

Potential equality effect	Existing mitigation and/or enhancement measures	Recommendations	Overall impact
Potential loss of business Construction of the Scheme has the potential to result in the loss of businesses currently trading on the Bridge Close site. At present, there are 26 businesses operating on the extended site in a range of sectors, with the most dominant sector being manufacturing. As found in the literature review, research suggests those who are self-employed business owners are more likely to be negatively impacted should business closure arise. Those more likely to be self-employed include ethnic minority groups and older people. Of businesses that responded to the on-Site survey undertaken within the original RLB in 2023, 30% of business owners were from an ethnic minority group, and 22% were older people aged 65 and over The survey of businesses within the RLB extension undertaken in September 2024 highlighted that whilst the LIA is disproportionately represented by ethnicity minority groups (59% of the LIA population), the profile of owners of businesses currently trading within the Study Area is 67% White British.	Relevant documents are reviewed within Appendix D of the Bridge Close Redevelopment EqIA and outline the following measures that would be provided to businesses that are impacted by the regeneration scheme. The council will ensure that it provides: ● Assistance in identifying appropriate alternative sites within the borough or in neighbouring boroughs; and ● Business analysis support to highlight potential future growth potential and business direction. To minimise impact and disruption to business as much as possible, the following factors will be considered by the Council when assessing potential relocation sites: ● Customer base and location; ● Current and proposed tenure type; ● Employment contribution to the local economy; ● Transportation requirements; ● Current site use and intensification; and ● Individual business and investment plans. The Development Manager will engage with occupiers over relocation issues and will: ● produce a comprehensive and ongoing assessment of the current	This risk requires ongoing management and the Council should consider the following recommendations: ● All reasonable efforts should be made to retain the business within the local area, where this is the preference of the business. Additionally, relocation of businesses should be tracked where possible. In the case where a business is permanently closed or relocated from the current premises, existing customers should be: ● provided with guidance on how to access the new location by public transport or active travel; ● signposted to alternative businesses providing similar services within the local community	There may be differential adverse impacts on **ethnic minority groups and older people** as a result of a potential loss of business. Overall, there are likely to be **limited adverse effects** on groups with protected characteristics as a result of potential loss of business, due to the existing mitigation measures put in place by the Council.

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Potential equality effect	Existing mitigation and/or enhancement measures	Recommendations	Overall impact
	occupiers needs and requirements, and potential alternative sites; ● accurately record all correspondence with businesses; ● manage third party consultants, including those appointed to offer compensation advice; ● ensure disturbance to the businesses is minimised, offering support measures where available; and ● work effectively with relevant organisations to ensure that businesses receive up-to-date and reliable information about the relocation process.		
Financial implications associated with business relocation: The Bridge Close redevelopment Scheme will result in either the relocation of businesses trading on the Site, or business closure. As highlighted above, 26 businesses will be affected, and may require the use of CPO powers in order to secure possession. This will result in the demolition and closure of the affected businesses, which span across a range of sectors including private medical practice, catering businesses, and a taxi service. When relocated to new industrial or commercial premises, access to finance is needed to secure a new location. Depending on the geography of where affected businesses may relocate to, relocation may disrupt the local customer bases that have been developed by businesses over time. This could result in a loss in business and create adverse	In order to complete the acquisition of land interests, the Council will make offers to landowners and occupiers which reflect their entitlement to compulsory purchase compensation and the 'value for money' the acquisition may provide. All businesses will be entitled to compensation, as set out in the statutory compensation code. Additional financial support will be offered in advance of taking possession of the business to help facilitate the relocation. This may include: ● Payment of reasonable interim professional fees; ● Early acquisition and leaseback of a business' existing site to allow for a new premises to be acquired and prepared while the business continues to operate at its current location; and	This risk requires further management and the Council should consider the following recommendations: ● Where new space within the Site is available, business owners should be given the opportunity to submit their interest in the space. ● Ensure all businesses on the Site are provided with a clear timeline of events regarding the proposed redevelopment.	There may be differential adverse impacts on **ethnic minority groups, older people and disabled people** as a result of the financial implications associated with business closure and/or relocation. Overall, due to the existing mitigation measures put in place by the Council, there is likely to be **limited adverse effects** on these groups, particularly if existing businesses are successfully relocated in the local area.

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Potential equality effect	Existing mitigation and/or enhancement measures	Recommendations	Overall impact
financial implications. Evidence indicates that minority ethnic groups may experience difficulty in accessing financial support and re-establishing a business in a new location. The survey of businesses undertaken in September 2024 highlighted that whilst the LIA is disproportionately represented by ethnicity minority groups (59% of the LIA population), the profile of owners of businesses currently trading within the Study Area is 67% White British.	• An option to provide the certainty of an agreed purchase price for an existing property once alternative premises have been identified		
Redundancy due to loss of businesses: Construction of the Scheme has the potential to result in the loss of businesses currently trading within the extended RLB of the site. These changes may create direct redundancies or result in indirect redundancies by current staff being unable to access future employment at a different location. This can affect groups who are more likely to face barriers to employment than others. particularly older people, disabled people, and ethnic minority groups. The LIA is disproportionately represented by ethnicity minority groups (59% of the LIA population). The survey of businesses undertaken in September 2024 identified that 66% of employees were from ethnic minority groups, specifically Asian.	Relevant documents are reviewed within Appendix D of the Bridge Close Redevelopment EqIA and outline the following measures that would be provided to businesses that are impacted by the regeneration scheme. The council will ensure that it provides: • Assistance in identifying appropriate alternative sites within the borough or in neighbouring boroughs; • work effectively with relevant organisations to ensure that businesses receive up-to-date and reliable information about the relocation process.	This risk requires ongoing management and the Council should consider the following recommendations: • All reasonable efforts should be made to retain the business within the local area, where this is the preference of the business. Additionally, relocation of businesses should be tracked where possible. • Work proactively and constructively through a range of channels, including face to face engagement where possible with vulnerable employees to signpost them to employment support	There may be differential adverse impacts on **ethnic minority groups and older people** as a result of redundancies due to a potential loss of business. Ethnic minority groups may also experience disproportionate adverse impacts as they form a majority of the affected employees. Overall, there are likely to be **limited adverse effects** on groups with protected characteristics as a result of potential loss of business, due to the existing mitigation measures put in place by the Council.
Impact of redundancy on health and wellbeing: The Scheme will require businesses currently trading on the Site to relocate. The Scheme and potential use of CPO	Relevant documents are reviewed within Appendix D of the Bridge Close Redevelopment EqIA and outline the following measures that would be provided	This risk requires further management and the Council should consider the following recommendation: • In the case where a business chooses to close, the Council and its	There are likely to be adverse impacts on groups with protected characteristics due to potential redundancy. **Children, young people, older people and those from ethnic minority groups** may be

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Potential equality effect	Existing mitigation and/or enhancement measures	Recommendations	Overall impact
powers will result in the demolition and closure of the affected businesses, which span across a range of sectors including private medical practice, restaurants, and a taxi service. CPO powers could be exercised over businesses where vacant possession has not been achieved. As set out in section 3.7, six commercial buildings have not yet finalised negotiations. If a suitable relocation premises is not identified, the redevelopment may result in business extinguishment. These changes could create direct redundancies or result in indirect redundancies due to current staff being unable to access future employment with the same business at a different location. The evidence review has demonstrated that children and young people (who are likely to be adversely impacted by their parents redundancy), older people and those from ethnic minority backgrounds are more likely to be negatively impacted by job loss when compared to other groups. Of businesses that responded to the on-Site survey, 30% of business owners were from an ethnic minority group, and 22% were older people aged 65 and over. With regards to employees, 24% were from an ethnic minority group. The profile of the LIA shows that it is disproportionately represented by children (22%) and individuals from an ethnic minority background (59%).	to businesses that are impacted by the regeneration scheme. ● A minimum local labour target of 20% during construction and end user phase for major commercial or mixed use developments including a proportion of apprenticeships where the length of construction phase allows; ● A minimum local labour target of 20% during construction for major residential developments; ● The notification of all vacancies associated with the development and its end use through the Council's employment service; and ● Offer opportunities to local businesses within their supply chains.	advisors should signpost training and employment opportunities to affected staff, as well as resources and organisations for mental health support where required.	differentially impacted. **Children and ethnic minority groups** may also be impacted disproportionately due to their over-representation in the LIA. However, if the proposed recommendations are implemented, there is likely to be a **limited adverse equality effect** on these groups.

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Potential equality effect	Existing mitigation and/or enhancement measures	Recommendations	Overall impact
Impact on customer base: The Scheme has the potential to close or relocate businesses used by the Romford population. The demolition and consequent closure of these businesses has the potential to disadvantage local customers of these businesses. Depending on where affected businesses relocate to, such relocation could create a barrier in access for customers. Alternatively, the loss of a business could result in the total loss of service delivered to existing local consumers. Research suggests that certain groups, such as older people, disabled people and ethnic minority groups may be more reliant on existing networks and links to local businesses. As a result, sudden changes in locations of businesses could reduce their access to services. The LIA population is disproportionately represented by ethnic minority groups (59%) who are likely to disproportionately represent the customer base of businesses within the Site.	Relevant documents are reviewed within Appendix D of the Bridge Close Redevelopment EqIA and outline the following measures that would be provided to businesses that are impacted by the regeneration scheme. The council will: ● Provide communication about the regeneration proposals throughout the regeneration period through one-on-one meetings, direct letter correspondence, newsletters, briefings, events, website and email updates, in addition to dedicated points of contact in the Council or representatives	In the case where a business is permanently closed or relocated from the current premises, existing customers should be: ● provided with guidance on how to access the new location by public transport or active travel; or ● signposted to alternative businesses providing similar services within the local community, should the business be permanently closed. ● This information could be provided through the installation of signage/posters on the Site.	There may be differential adverse impacts on **ethnic minority groups, older people and disabled people** as a result of relocation of existing businesses on Site, and the potential reliance on existing businesses these groups may have. **Ethnic minority groups** are also disproportionately represented in the LIA and may therefore experience this effect disproportionately. However, none of the businesses within the RLB have been identified as providing specific services for a protected characteristic groups. As such it **unlikely there will be any equality impacts** on the customer base.

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6.1.3 Wider regeneration impacts

Table 6-3 Impact Assessment - wider regeneration impacts

Potential equality effect	Existing mitigation and/or enhancement measures	Recommendations	Overall impact
Improved housing provision: The Scheme provides a key opportunity to improve housing provision for the local population, with an aspiration of 1,070 new homes. In total, 10% of these homes will be wheelchair accessible. Housing will also meet a range of local needs, providing diverse accommodation types from one-bedroom units to family sized four-bedroom units. The evidence review found that improved housing provision will improve both physical and mental health and wellbeing outcomes for those that live in housing that is adequately warm. The provision of an adequate level of accessible housing (accessible homes and a diverse selection of accommodation types) will also benefit the local population. As a result, older people, children and young people, disabled people and those from an ethnic minority background are likely to benefit from improved housing stock in the local area. On Site, there is a large proportion of children (39%) and ethnic minority groups (60%). The population of the LIA also has a higher than average proportion of children (23%) and individuals from ethnic minority backgrounds (62%).	No mitigation and/or enhancement measures for this equality effect have been identified.	The availability of new housing, and its composition (i.e., number of bedrooms, wheelchair accessibility status) should be shared with the local community as far in advance of scheme operation as possible.	The delivery of new housing is likely to bring positive equality effects for local groups with protected characteristics. There are likely to be differential positive effects on **children and young people, older people, disabled people and those from an ethnic minority background**. There may also be disproportionate effects on **children and ethnic minority groups**, as these groups are over-represented both on Site and in the LIA. Overall, there is likely to be **positive impacts** on groups with protected characteristics.

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Potential equality effect	Existing mitigation and/or enhancement measures	Recommendations	Overall impact
Affordable housing provision: The Scheme aims to provide affordable housing, with an aspiration of 35% of the 1,070 homes designated as affordable. Of these, 30% will be available at Social Rent/London Affordable Rent and 70% will be available at intermediate affordable rents. As stated in the literature review, young people, women, disabled people, and LGBTQ+ people are most likely to face financial issues when securing alternative housing. These groups are therefore the most likely to benefit from the presence of affordable housing as a result of the Scheme. On Site, there is a large proportion of women (62%).	No mitigation and/or enhancement measures for this equality effect have been identified.	Rental fees and service charges for proposed properties should be shared with the local community as far in advance of scheme operation as possible.	The delivery of affordable housing is likely to bring positive equality effects for local groups with protected characteristics. There is likely to be a differentially positive impact on **young people, women, disabled people and LGBTQ+ people** who are likely to benefit from improved housing. There may also be disproportionate effects on women as this group is over-represented on Site. Overall, there is likely to be **positive impacts** on groups with protected characteristics.
Provision of upgraded religious resources Updates to the Scheme and consequent redevelopment will oversee the relocation of the HICC to the land to the south of the Site. The relocation of the HICC is anticipated to provide a religious space with greater capacity to serve the needs of the local community. The new building will have the capacity to host more than 1000 individuals during a single Jumu'ah, enabling the HICC to meet the growing demand for their services. Literature points to the importance of religious places of worship in helping generate solidarity, manage adversity and promote resilience amongst religious communities. This improvement to the religious space is likely to benefit members of the local Muslim community who are likely to use the space. Indeed, the population of	Relevant documents are reviewed within Appendix D of the Bridge Close Redevelopment EqIA and outline the following measures that could be implemented to enhance the provision of religious facilities: ● The council will provide communication about the regeneration proposals throughout the regeneration period through one-on-one meetings, direct letter correspondence, newsletters, briefings, events, website and email updates, in addition to dedicated points of contact in the Council or representatives.	It is recommended that the Council: ● Seeks input from local community groups and users of the HICC to understand how to maximise the benefit gained from the new building. ● Engagement surrounding the relocation of HICC should also take into account and work around significant Islamic religious celebrations, such as Eid.	The upgraded HICC building is anticipated to generate positive equality effects. **Children, ethnic minority groups and older people** are likely to differentially benefit from improved provision of community and religious facilities. The improvement to religious resources is likely to disproportionately benefit members of the local **Muslim** community who are more likely to use the space. If the proposed recommendations are implemented, there is likely to be a **positive effect** on groups with protected characteristics.

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Potential equality effect	Existing mitigation and/or enhancement measures	Recommendations	Overall impact
the LIA is disproportionately represented be people who identify as Muslim (12%).			
Provision of community resources: The Scheme includes the provision of a series of new community infrastructure, including several key resources. This includes a new three form entry primary school and nursery. The new three form entry primary school will provide 630 school places 47 nursery places. Across both educational facilities there will be a total on 18 spaces for SEND pupils. A new flexible health centre and community centre are also part of the masterplan design. The planning application permits the space assigned for the health centre to be used for alternative uses if NHS confirms that accommodation is not required. Such improvements to community infrastructure on Site provide opportunities to promote social cohesion and are therefore likely to benefit groups that are more at risk of social exclusion. Such groups include children, ethnic minority groups and older people. On Site, there is a large proportion of children (39%) and ethnic minority groups (60%). The population of the LIA also has a higher than average proportion of children (23%) and individuals from ethnic minority backgrounds (62%).	Documents reviewed within Appendix D outline the following measures that could be implemented to enhance the provision of community facilities: ● The council will provide communication about the regeneration proposals throughout the regeneration period through one-on-one meetings, direct letter correspondence, newsletters, briefings, events, website and email updates, in addition to dedicated points of contact in the Council or representatives.	It is recommended that the Council: ● Seeks input from local community groups to understand how to maximise the benefit gained from the new facilities. ● Engage with local residents to understand how the new community centre, health centre, and nursery could best serve them. This may include longer opening hours at the nursery, or specific services being offered at the health clinic (such as walk ins).	The creation of new community resources is anticipated to generate positive equality effects. Children, ethnic minority groups and older people are likely to differentially benefit from improved provision of community facilities. This effect may also be disproportionate for ethnic minority groups and children, who are both disproportionately represented on Site and in the LIA. If the proposed recommendations are implemented, there is likely to be a **positive effect** on groups with protected characteristics.
Employment opportunities: Redevelopment of the Site may act as a catalyst for promoting local economic growth and supporting job creation. The construction phase of the scheme will also provide temporary employment opportunities those in the construction sector. Such job opportunities are likely to positively impact protected characteristic groups more likely to face unemployment including ethnic minority groups, older people, disabled people and young people. Likewise,	Documents reviewed within Appendix D outline that the council could implement the following measures to enhance the effects of employment opportunities: ● Provide communication about the regeneration proposals throughout the regeneration period through one-on-one meetings, direct letter correspondence, newsletters, briefings, events, website and	Employment planning for the scheme should look to focus on creating job opportunities for those protected characteristic groups who are more likely to be impacted by unemployment, including people from ethnic minority groups, older, disabled, younger people and men.	The changes to employment opportunities as a result of the scheme operation are anticipated to generate **positive equality effects.** There is likely to be a differential positive impact on those more likely to face unemployment including **people from ethnic minority groups, older, disabled, younger people and men.** This

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Potential equality effect	Existing mitigation and/or enhancement measures	Recommendations	Overall impact
employment opportunities in the construction industry are likely to benefit men who are more likely to work in construction. On Site, there is a large proportion of ethnic minority groups (60%). The population of the LIA also has a higher than average proportion of individuals from ethnic minority backgrounds (62%).	email updates, in addition to dedicated points of contact in the Council or representatives. Furthermore, Scheme employment targets include: ● 61 Havering residents employed ● 58 Apprenticeships ● 29 career events ● 25 qualifications and certificated gained by local residents		effect may also be disproportionate for ethnic minority groups, who are disproportionately represented both on Site and in the LIA.
Improved public realm and provision of urban green space: The Scheme will result in a new landscape for the residents of, and those local to, Bridge Close. Improvements to public open space will include a new public square, civic square and riverside walk. A range of planting and green spaces across the Site to enhance wildlife, improve biodiversity and complement the built environment will also be present. The new active travel provisions will also better integrate Bridge Close into the fabric of the town and provide improved transport links to the proposed southern entrance at Romford Station. As highlighted in the literature review, these improvements to the public realm are likely to benefit children, older people, disabled people, those from ethnic minority backgrounds and women. On Site, there is a large proportion of children (39%), ethnic minority groups (60%) and women (62%). The population of the LIA also has a higher than average proportion of children (23%) and individuals from ethnic minority backgrounds (62%).	Documents reviewed within Appendix D outline the following measures that could be implemented to enhance the provision of facilities within the public realm. The council will ensure that: ● Communication is provided about the regeneration proposals throughout the regeneration period through one-on-one meetings, direct letter correspondence, newsletters, briefings, events, website and email updates, in addition to dedicated points of contact in the Council or representatives.	The council and its advisors should ensure that improvements to public space (including the pedestrian environment and play spaces on the Site) appropriately consider best practice in accessible and inclusive design (such as Design for the Mind), benefitting older and disabled people, including those with mobility and sensory impairments. Where possible, different user groups should be included in co-design of spaces to reflect different needs and lived experiences of using public space.	With consideration that the Council has taken all reasonable measures to manage the impact, there is likely to be a differential positive impact on **older people, children, disabled people, women and those from ethnic minority groups** as more green space and accessible public realms can help influence these groups to participate more in public life. This effect may also be disproportionate for ethnic minority groups, children and women who are disproportionately represented both on Site and in the LIA. The improvements to the public realm during operation are likely to cause **positive equality effects.**
Safety and security:	Documents reviewed within Appendix D outline the following measures that could be implemented to ensure that	It is recommended that the council ensure that during the construction and operation phases of the scheme:	With consideration that the Council has taken all reasonable measures to manage the impact, there may

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Potential equality effect	Existing mitigation and/or enhancement measures	Recommendations	Overall impact
Feelings of safety and security amongst the local population are likely to be impacted during both the construction and operation phases of the Scheme. During the redevelopment, the construction process may attract unwanted activity such as anti-social behaviour and crime. This may result in the local population feeling unsafe and fearful of their own security. However, the overall improvements made to the public realm and management of the Site during redevelopment may reduce crime and in turn have a positive effect. Indeed, the Council expects the scheme to have a material impact on the reduction of crime and anti-social behaviour currently linked to the area. The effects of crime are likely to differentially impact protected characteristic groups who are more likely to be vulnerable to attacks including disabled people, young people, LGBTQ+ people and people from ethnic minority groups. On Site, there is a large proportion of ethnic minority groups (60%). The population of the LIA also has a higher than average proportion of individuals from ethnic minority backgrounds (62%).	feelings of safety and security are maintained. The council will ensure that: ● It commits to the continued maintenance of each Council residential housing estate to a high standard throughout the period of the regeneration scheme, keeping noise and disruption of building work at a minimum and maintaining site security for the safety of residents. ● Provide transparent and effective communication through a variety of outlets such as leaflets or one to one meetings. ● New buildings are designed to Secured By Design principles	● Sufficient and adequate CCTV is provided in and around the regeneration site. ● There is an available contact advertised for individuals to contact surrounding any queries of the safety/security of the site. ● During operation encourage community involvement and participation in the management and running of any public space; and support local projects which use the space. ● During operation ensure the public spaces are well maintained and well lit, making the space feel looked after and therefore more welcoming.	be limited adverse impacts on groups with protected characteristics due to changes in safety and security. There is the potential for differential adverse equality effects for disabled people, young people, LGBTQ+ people and people from ethnic minority groups during the construction process. There may also be disproportionate effects on ethnic minority groups, as this group is over-represented both on Site and in the LIA. However, if the proposed recommendations are implemented, there is likely to be **no adverse effect** on groups with protected characteristics as a result of changes in safety and security. There is the potential for differential **positive equality effects** for **disabled people, young people, LGBTQ+ people and people from ethnic minority groups** once the redevelopment is complete, due to improved safety and security measures.

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7 Conclusions and action plan

7.1 Conclusion

The Bridge Close redevelopment has the potential to provide improved living conditions, housing quality, new community facilities, an improved public realm, commercial space and employment opportunities for the local area. There is, therefore, a compelling case in the public interest for the land assembly and regeneration, as well as the potential use of CPO powers to facilitate this.

This is likely to have a beneficial equality impact for groups with protected characteristics. The population of the LIA has higher proportions of children, working age people, people from ethnic minority and faith groups, as well as higher levels of deprivation.

The 2024 extension to the extent of the redevelopment has the potential to further benefit protected characteristic equality groups. The expansion of the RLB and CPO boundary will facilitate the relocation of the HICC into a new and improved building, which will provide a positive impact for the local Muslim community and enhance social cohesion.

However, the EqIA has acknowledged that this must be weighed against the acknowledged potential disbenefits for several protected characteristic groups set out in Chapter 6. In this case, the Council has sought to mitigate these through a range of measures focused on rehousing assistance (for both residents and commercial units) and compensation options in order to realise the benefits associated with the redevelopment.

This EqIA demonstrates how the Council has shown due regard to the aims of the Public Sector Equality Duty (as set out in Section 1.2) throughout its decision-making process and has considered the needs of different protected characteristic groups.

7.2 Action Plan

The following action plan seeks to establish activities and responsibilities that aim to address any potential outstanding equality issues where they arise. Actions have been mapped against relevant equality effects identified in section 6.1 of this report.

Table 7-1 Action Plan

Action	Relevant equality effect(s)	Responsible parties	Timescales
Continue to update the existing Communication and Engagement Plan which focusses on outreach through face-to-face engagement, including: ● visits to homes and businesses; ● information sessions on specific topics or themes; ● a review and update of information available on the dedicated redevelopment website; ● upcoming public consultations; ● any additional redevelopment update events;	Health effects associated with relocation Loss of social cohesion associated with relocation Access to affordable housing Access to appropriate and accessible housing Loss of community resources Emergency Service response reconfiguration Potential loss of businesses Impact on existing customer base	London Borough of Havering	Ongoing

Action	Relevant equality effect(s)	Responsible parties	Timescales
● plans to engage with the local community to understand how the benefits of the new nursery, community centre and health centre can be best realised; ● details around how the new location of both community resources and businesses will be shared with the wider community in advance of relocation taking place. ● Continue to give consideration to ensuring all information is provided in appropriate formats and languages to suit different needs.	Provision of community resources		
Maintain an up-to-date record of equality concerns identified through both outreach and formal reporting, ensuring any change in need is reflected. This is applicable to both residents and commercial premises within the Site.	All effects	London Borough of Havering	Ongoing
Create a strategy that highlights the Council's commitment to relocating community resources on the Site, separate from the current Business Relocation Strategy. The Strategy should strive to help relocate community resources in the local area where possible, preventing the extent of disruption to both owners and users of the service.	Loss of community resources Provision of community resources	London Borough of Havering	First draft to be produced following submission of EqIA
Continue to align redevelopment employment and training plans in line with the existing Bridge Close Employment and Skills Plan This includes proposals to maximise the employment, apprenticeship and training opportunities created by the Scheme for local residents. Contract clauses that specify a certain proportion of the construction workforce is drawn from the local area is included, as well as opportunities for work-based training, such as apprenticeships.	Impact of redundancy on health and wellbeing Employment opportunities Improved public realm and provision of urban green space Provision of community resources	London Borough of Havering	To be reviewed prior to contractor appointment with firm contractor commitments sought as part of contractual arrangements
Access to all community facilities on site should be maintained for as long as possible prior to the redevelopment commencing. Any changes in arrangements, including access, should be communicated to users in advance.	Loss of community resources	London Borough of Havering	Ongoing
Provide suitable opportunities to enable existing residents, businesses and community resources to access, or buy into, new commercial, work and community space in the redevelopment scheme. It should be ensured that residents, businesses and community resources are provided with information that sets out the proposed cost (both purchase and rental fees) and sizes of space available. With regards to residential properties, this should	Access to affordable housing Improved housing provision Affordable housing provision Loss of community resources Potential loss of businesses Financial implications associated with business relocation	London Borough of Havering	Ongoing

Action	Relevant equality effect(s)	Responsible parties	Timescales
include the composition of housing available (i.e. number of bedrooms, wheelchair accessibility status etc).	Provision of community resources		
Ensure all businesses, community resources and residents on the Site are provided with a clear timeline of events regarding the proposed redevelopment. This will help them to mitigate in advance, where possible, the potential negative effects that the scheme may have on themselves and/or their business/community resource. This information should be made available in appropriate formats and languages to suit different needs. This should be sent via post and include the name(s) and contact details of people that can be contacted in the Council should they have any questions.	Health effects associated with social relocation Loss of social cohesion associated with relocation Loss of community resources Potential loss of businesses	London Borough of Havering	Ongoing
In the case where a business is permanently closed or relocated from the current premises, existing customers should be: ● Provided with guidance on how to access the new location by public transport or active travel ● Signposted to alternative businesses providing similar services within the local community ● This information could be provided through the installation of signage/posters on the Site.	Potential loss of businesses Impact on existing customer base	London Borough of Havering	Ongoing
Should the Scheme cause redundancy as a result of business closure, efforts should be made to signpost training and employment opportunities to affected staff, as well as resources and organisations available for mental health support where required.	Impact of redundancy on health and wellbeing	London Borough of Havering	Ongoing
Keep a record of the location that residents and commercial premises have relocated to following the redevelopment. This exercise will help to understand how many have been able to remain located within their desired location, and provide valuable lessons learned for future redevelopment in the borough.	Health effects associated with social relocation Loss of social cohesion associated with relocation Access to affordable housing Access to appropriate and accessible housing Loss of community resources Emergency Service response reconfiguration Potential loss of businesses Impact on existing customer base	London Borough of Havering	Ongoing
Ensure that consideration is given to children impacted by the redevelopment, particularly with regards to relocation. A record of the schools/nurseries that children attend should be maintained, with this taken into account when sourcing both temporary and permanent alternative accommodation.	Health effects associated with relocation Loss of social cohesion associated with relocation	London Borough of Havering	Ongoing

Action	Relevant equality effect(s)	Responsible parties	Timescales
Local residents should be made aware of the construction process, timeline and mitigation measures put in place for the scheme, particularly with regards to safety and security. Mitigation should include, but not be limited to, sufficient and adequate lighting and CCTV provided in and around the regeneration site at all stages. An available contact should be advertised for individuals to contact surrounding any queries of the safety/security of the site.	Health and wellbeing of the local population Safety and security	London Borough of Havering	Prior to, and throughout, construction
Ensure the construction phase of the scheme will be undertaken according to best practice measures for noise and air quality, to effectively mitigate impacts. Such measures should be included in the CEMP and consideration should be given to recommendations included in the Environmental Impact Assessment. Any environmental monitoring reports should be shared with local residents for transparency.	Health and wellbeing of the local population	London Borough of Havering Contractor(s)	Prior to, and throughout, construction
To create a new and improved public realm that reflects best practice in assessable and inclusive design (such as Design for the Mind). This includes public space such as the pedestrian environment, urban green space and any play spaces that may be provided. Where possible, different user groups should be included in co-design of spaces to reflect different needs and lived experiences of using public space.	Improved public realm and provision of urban green space	London Borough of Havering Contractor(s)	Ongoing
The phasing plan should be developed so that access to the HICC is maintained throughout the construction and demolition period. Any changes in arrangements, including access, should be communicated to users in advance.	Loss of community resources	London Borough of Havering	Ongoing
Seek input from local community groups and users of the HICC to understand how to maximise the benefit gained from the new building.	Provision of community resources	London Borough of Havering	Ongoing
Engagement surrounding the relocation of HICC should also take into account and work around significant Islamic religious celebrations, such as Eid.	Provision of community resources	London Borough of Havering	Ongoing

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A. Demographic profile

The demographic profile of the area in which the scheme is located is outlined below. This shows the proportion of people with different protected characteristics living in wards within the Local Impact Area (LIA) alongside the Borough of Havering, the regional (Greater London) and national (England) proportions. Where a 3% difference is reported, the change is considered slightly higher or lower, however where a 5% difference is reported, a considerable difference is acknowledged and reported as such.

A.1.1 Age

The table below shows the population by age group including children, young people, the working age population and older people.

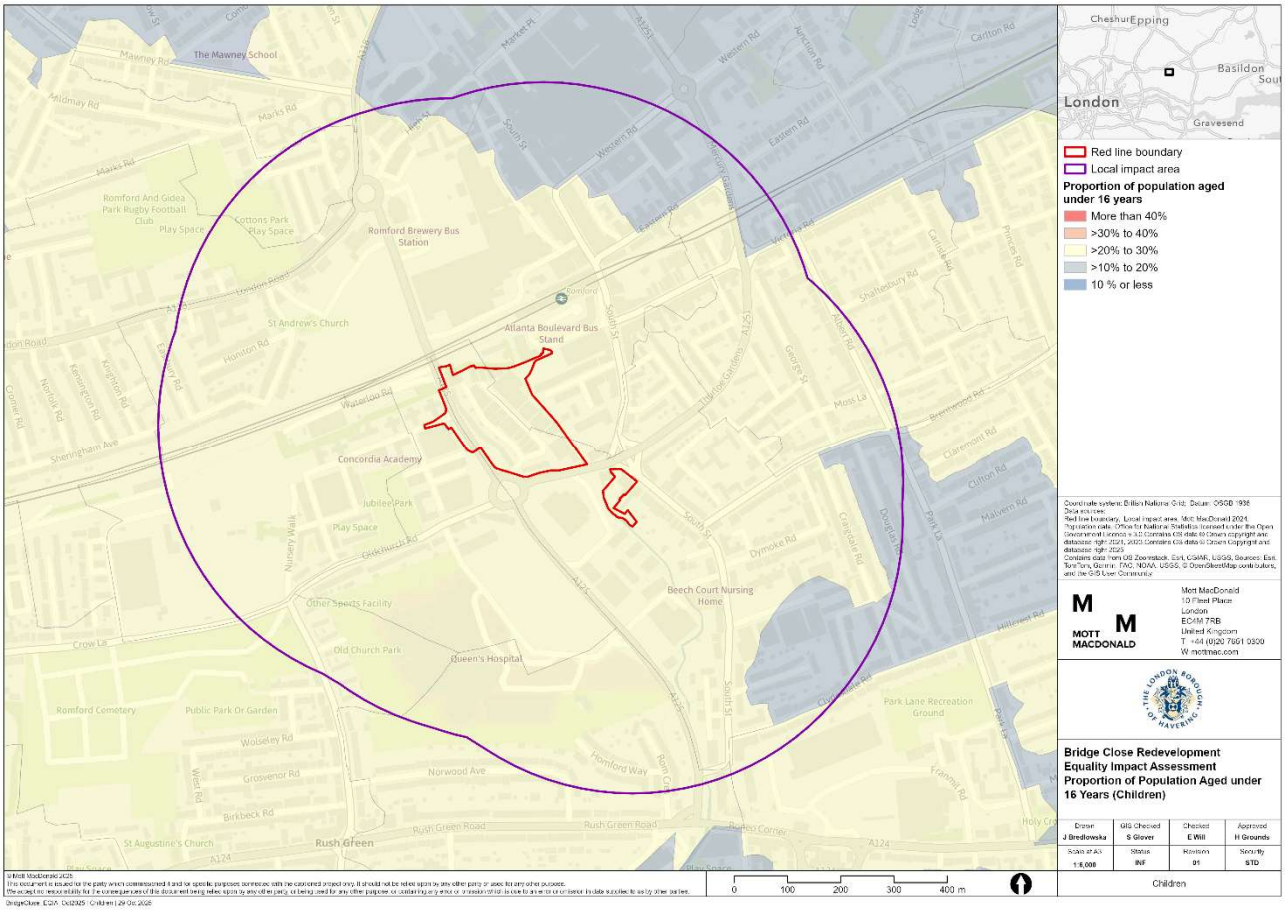
Table A.1: Population by age group

Age	LIA	Havering	Greater London	England
Children (aged 0-15)	22%	20%	19%	19%
Young people (aged 16-24)	9%	10%	11%	11%
Working age population (aged 16-64)	70%	62%	69%	63%
Older people (aged 65 and over)	7%	18%	12%	18%

Source: ONS Census, 2021

As shown in the above table, the proportion of children within the LIA (22%) is slightly higher than the regional and national proportions (both 19%), however is broadly in line with Havering (20%). 9% of the population within the LIA are young people, which is broadly in line with Havering (10%) alongside regional and national proportions (both 11%). The proportion of the population who are of working age within the LIA (70%) is considerably higher than both Havering (62%) and England (63%) however broadly in line with the regional proportion of 69%. 7% of the population within the LIA are older people, which is considerably lower than within Havering (18%), Greater London (12%) and England as a whole (18%).

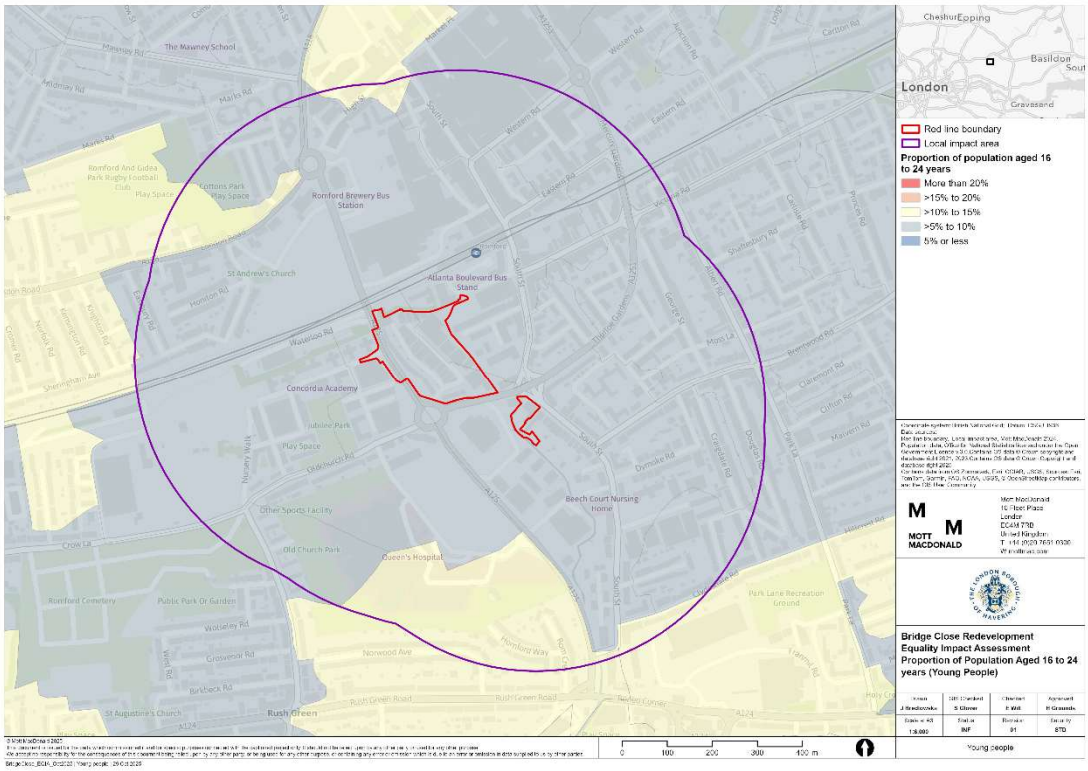
Figure A.1: Proportion of children within the population



Source: ONS Census 2021

Figure A.1 shows that the proportion of children aged under 16 within the extended RLB is between 20% and 30% of the total population. This is in broadly line with Havering Borough.

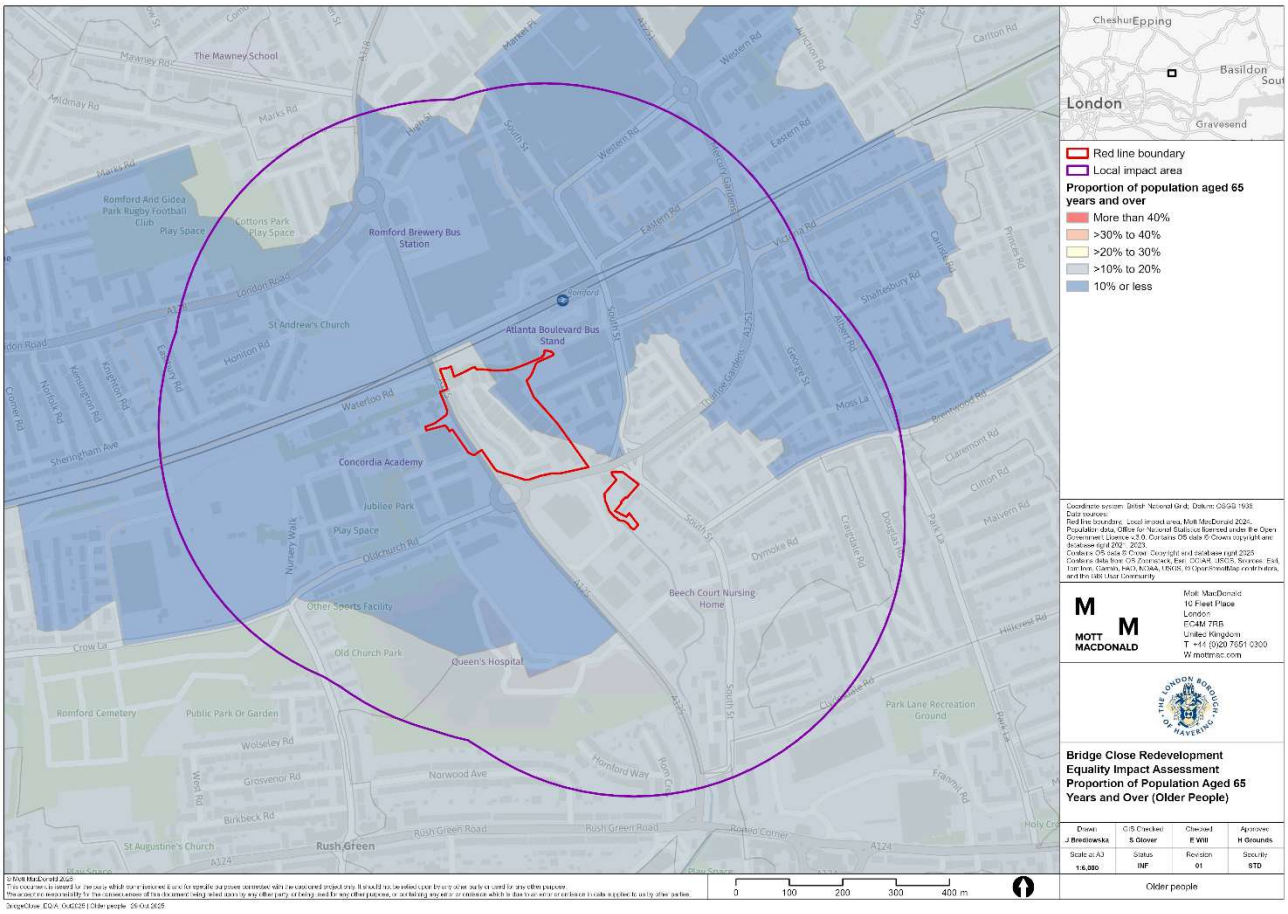
Figure A.1: Proportion of total residents that are aged 16 to 24 years



Source: ONS Census 2021

Figure A.2 shows that the proportion of people aged 16 to 24 within the extended RLB is between 5% and 10% of the total population. This is broadly in line with Havering Borough.

Figure A.2: Proportion of total residents that are aged 65 years and over



Source: ONS Census 2021

Figure A.3 shows that the proportion of older people aged 65 and over within the RLB of the larger Site is between 0% and 20% of the total population. This is slightly higher than within Havering Borough. In comparison, the proportion of older people in the smaller Site is between 10% and 20%. This is considerably higher than within Havering Borough.

A.1.2 Disability

The table below shows the proportion of the population with a disability that limits their day-to-day activities.

Table A.2: Population by disability

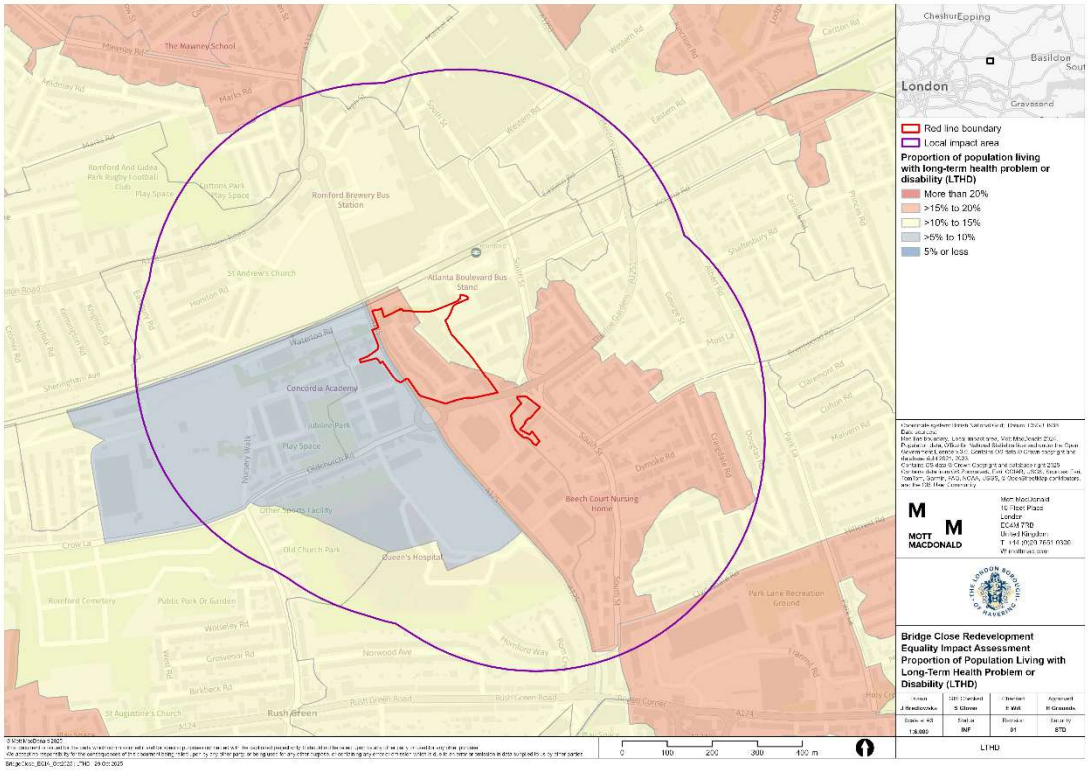
Disability	LIA	Havering	Greater London	England
Day-to-Day Activities Limited a Lot	5%	6%	6%	7%
Day-to-Day Activities Limited a Little	7%	8%	7%	10%
Has a long term physical or mental health condition but day-to-day activities not limited	4%	6%	5%	7%

Source: ONS Census, 2021

The above table outlines that the proportion of population within the LIA with a disability that limits their day-to-day activities a lot (5%) is broadly in line with the Havering (6%), Greater

London (6%) and national proportions (7%). The proportion of population whose day-to-day activities are limited a little within the LIA (7%) is broadly in line with Havering (8%) and Greater London (7%), however slightly lower than England (10%). 4% of the LIA population have a long term physical or mental health condition, however their day-to-day activities are not limited. This is broadly in line with Havering (6%) and Greater London (5%), however slightly lower than England as a whole (7%).

Figure A.3: Proportion of total residents with a long-term health problem or disability



Source: ONS Census 2021

Figure A.4 shows that the proportion of people with a long-term health problem or disability within the RLB of the larger Site is between 0% and 20% of the total population. This is broadly in line with Havering Borough. In comparison, the proportion of people with a long-term health problem or disability within the RLB of the smaller Site is between 15% and 20%. This is slightly higher than within Havering Borough.

A.1.3 Gender reassignment

The table below shows the breakdown of the population of Havering, Greater London and England by gender identity. No data is available for the LIA.

Table A.3: Gender reassignment

Gender identity	Havering	Greater London	England
Gender identity the same as sex registered at birth	94%	91%	94%
Gender identity different from sex registered at birth but no specific identity given	0.3%	1%	0.2%

Gender identity	Havering	Greater London	England
Trans woman	0.1%	0.2%	0.1%
Trans man	0.1%	0.2%	0.1%
All other gender identities	0%	0.1%	0.1%

Source: ONS Census, 2021

The above table outlines that the proportion of the population with a gender identity the same as sex registered at birth is slightly lower in Greater London (91%) than both Havering (94%) and England (94%).

The population who identifies with a different sex from that registered at birth in Greater London (1%) is considerably higher than both Havering (0.3%) and England (0.2%). The population of trans women in Havering (0.1%) is broadly in line with both Greater London (0.2%) and England (0.1%). Similarly, the population of trans men in Havering (0.1%) is broadly in line with both Greater London (0.2%) and England (0.1%). In addition, all other gender identities in Havering (0%) are broadly in line with both Greater London (0.1%) and England (0.1%).

A.1.4 Marriage and civil partnership

No impacts are anticipated with regard to marriage and civil partnership; however, demographic data can be found below.

Table A.4: Population by marital and civil partnership status

Marriage and civil partnership	LIA	Havering	Greater London	England
Single (never married or never registered a civil partnership)	48%	37%	46%	38%
Married	38%	47%	40%	45%
In a registered civil partnership	0.2%	0.1%	0.3%	0.2%
Separated (but still legally married or still legally in a civil partnership)	2%	2%	2%	2%
Divorced or formerly in a civil partnership which is now legally dissolved	8%	8%	7%	9%
Widowed or surviving partner	3%	6%	4%	6%

Source: ONS Census, 2021

The above table outlines that the proportion of the population who are single in the LIA (48%) is broadly in line with Greater London (46%), however considerably higher than the proportion within Havering (37%) and England (38%). The population of those married in the LIA (38%) is broadly in line with Greater London (40%), however considerably lower than within Havering (47%) and England as a whole (45%). 0.2% of the population in the LIA are in a registered civil partnership. This is broadly in line with Havering (0.1%), Greater London (0.3%) and England as a whole (0.2%). In addition, 8% of the LIA population are divorced or formerly in a civil partnership which is now legally dissolved, which is broadly in line with all other regional comparators. 3% of the population within the LIA are widowed or a surviving partner which is

broadly in line with Greater London (4%), however lower than within Havering and London as a whole (6%).

A.1.5 Pregnancy and maternity

The table below shows the number of live births, the Total Fertility Rate (TFR)[25] and the General Fertility Rate (GFR)[26] for Havering, Greater London and England. No data is available for the LIA.

Table A.5: Pregnancy and maternity rates

Births and fertility rate	Havering	Greater London	England
Live births	3,089	106,696	577,046
TFR	1.7	1.4	1.5
GFR	58.7	50.4	51.9

Source: ONS, 2022

The above table outlines that Havering has a considerably higher GFR (58.7) than both Greater London (50.4) and England as a whole (51.9). This indicates there are higher birthing levels within Havering.

A.1.6 Race and ethnicity

The table below provides a breakdown of the population of the LIA, Havering, Greater London and England by ethnicity.

Table A.6: Population by race and ethnicity

		LIA	Havering	Greater London	England
White	**English/Welsh/Scottish/Northern Irish/British**	41%	67%	37%	74%
	Irish	1%	1%	2%	1%
	Gypsy or Irish Traveller	0.2%	0.1%	0.1%	0.1%
	Other White	17%	7%	15%	6%
Mixed/multiple ethnic groups	**White and Black Caribbean**	2%	1%	2%	1%
	White and Black African	1%	1%	1%	0%
	White and Asian	1%	1%	1%	1%
	Other Mixed	2%	1%	2%	1%
Asian/Asian British	**Indian**	5%	4%	8%	3%
	Pakistani	3%	2%	3%	3%
	Bangladeshi	3%	2%	4%	1%
	Chinese	1%	1%	2%	1%

[25] The number of live children that a group of women would bear if they experienced the age-specific fertility rates of the calendar year in question throughout their childbearing lifespan

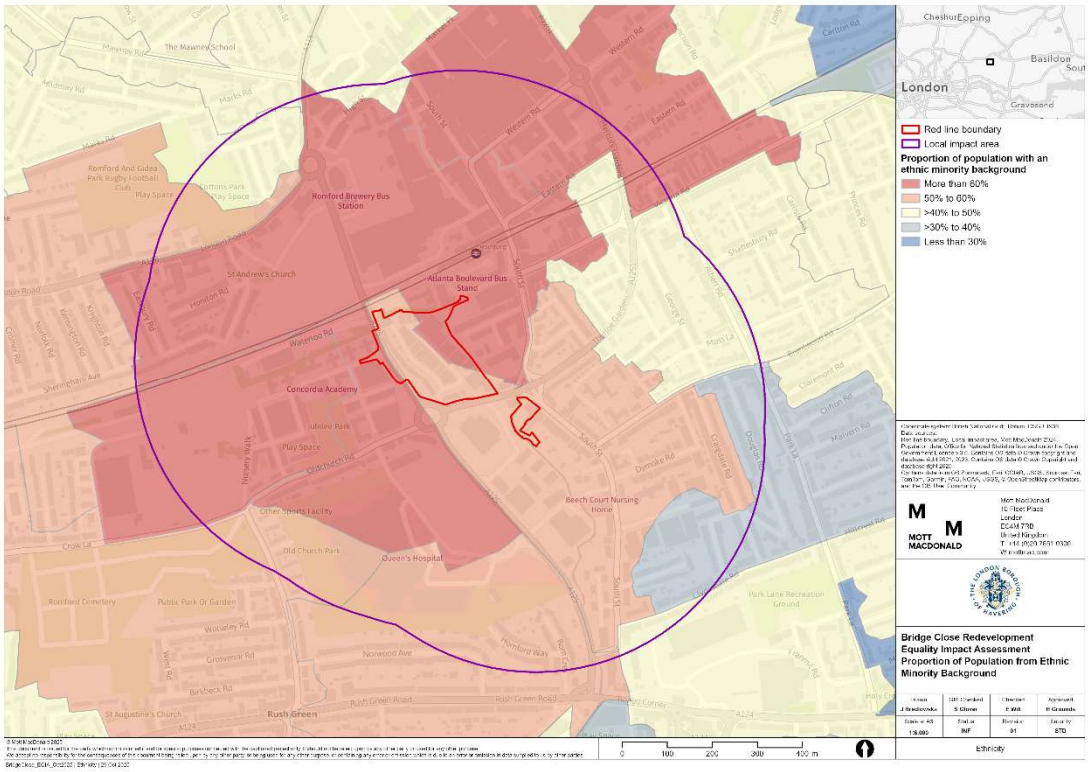
[26] The number of live births in a year per 1,000 women aged 15 to 44 years. Measure of current fertility levels.

	Other Asian	4%	2%	5%	2%
Black/African/Caribbean/Black British	**Black African**	9%	5%	8%	3%
	Black Caribbean	3%	2%	4%	1%
	Other Black	1%	1%	2%	1%
Other ethnic group	**Arab**	1%	0.3%	2%	1%
	Any Other Ethnic Group	3%	2%	5%	2%
Proportion of the population who have an ethnic minority background		59%	34%	63%	27%

Source: ONS Census, 2021

The above table outlines that the proportion of the population who belong to 'Other White' ethnic groups within the LIA (17%) is considerably higher than within both Havering (7%) and England as a whole (6%) yet broadly in line with Greater London (15%). This shows that the 'Other White' ethnic group is the largest ethnic minority group in the local area. In addition, 9% of the population within the LIA are Black African, which is broadly in line with Greater London (8%), however slightly higher than Havering (5%) and considerably higher England as a whole (3%). Overall, within the LIA 59% of the population have an ethnic minority background, which is slightly lower than Greater London (63%) however considerably higher than proportions within the Borough (34%) and England as a whole (27%). Therefore, the LIA is shown to consist of an ethnically diverse population.

Figure A.4: Proportion of total residents who are from an ethnic minority background



Source: ONS Census, 2021

Figure A.5 shows that the proportion of people who are from ethnic minority backgrounds within the RLB of the larger Site is between 50% and more than 60% of the total population. This is

broadly in line with the wider LIA demographic. In addition, the proportion of people from ethnic minority backgrounds within the RLB of the smaller Site is between 50% and 60%. This is broadly in line with the wider LIA demographic.

A.1.7 Religion and belief

The below table below provides a religious profile of the LIA compared with Havering, Greater London and England.

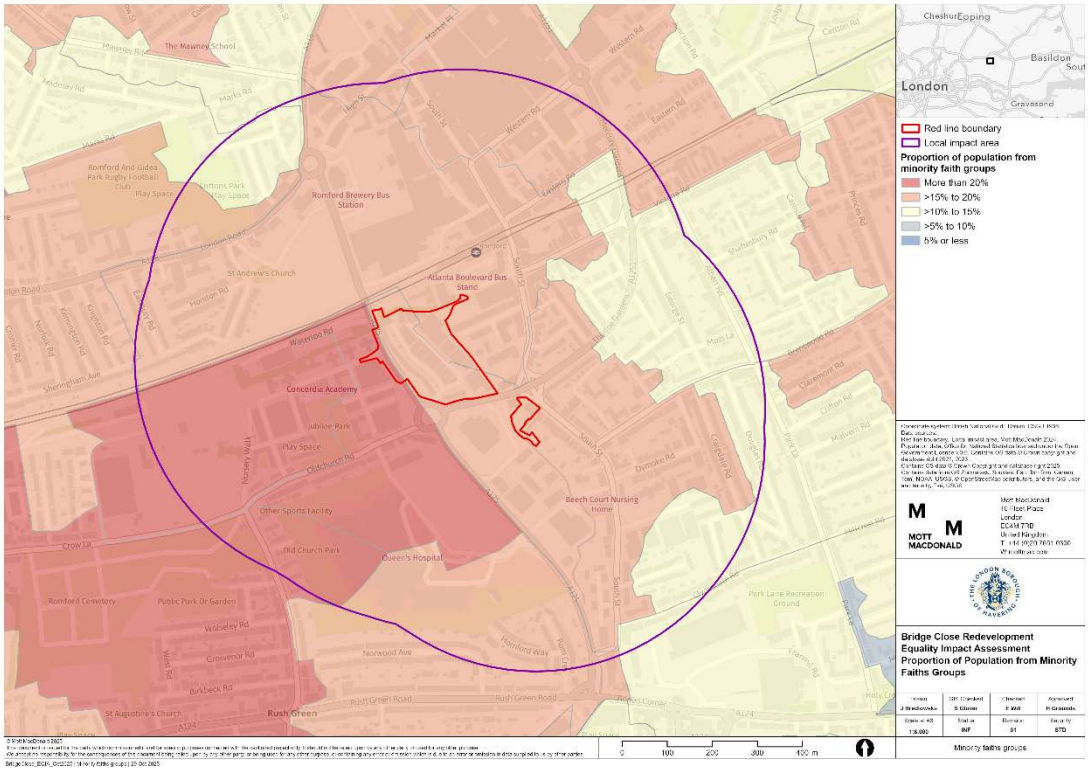
Table A.7: Population by religion and belief

Religion and belief	LIA	Havering	Greater London	England
Christian	48%	52%	41%	46%
Buddhist	1%	0.4%	1%	1%
Hindu	4%	3%	5%	2%
Jewish	0.2%	1%	2%	1%
Muslim	12%	6%	15%	7%
Sikh	1%	2%	2%	1%
Other Religion	1%	0.4%	1%	1%
No Religion	28%	31%	27%	37%
Religion Not Stated	7%	6%	7%	6%
Minority religion	17%	12%	25%	11%

Source: ONS Census, 2021

The above table shows that the proportion of the population who are Christian within the LIA (48%) is lower than Havering (52%), however considerably higher than the proportion in Greater London (41%). The proportion is analysed to be broadly in line with England as a whole (46%). 12% of the population within the LIA are Muslim, which is considerably higher than within both Havering (6%) and England (7%), however slightly lower than the proportion within Greater London (15%). Overall, 17% of the population within the LIA belong to minority religious groups, which is considerably higher than the proportion within Havering (12%) and England (11%) although considerably lower than the proportion within Greater London (25%).

Figure A.6: Proportion of total residents who are from a minority faith group



Source: ONS Census, 2021

Figure A.6 shows that the proportion of people from a minority faith group within the RLB of the larger Site is between 15% to over 20%. This is broadly in line with the wider LIA demographic. In addition, the proportion of people from a minority faith group with the RLB of the smaller site is between 15% and 20%. This is broadly in line with the wider LIA demographic.

A.1.8 Sex

The below table shows the proportion of the population who are male and female within the LIA compared to Havering, Greater London and England.

Table A.8: Population by sex

Sex	LIA	Havering	Greater London	England
Male	48%	48%	49%	49%
Female	52%	52%	52%	51%

Source: ONS Census, 2021

The above table outlines that the ratio of men and women in the LIA is in line with the proportion within the Borough (48% and 52% respectively), as well as the regional (49% male, 52% female) and national proportions (49% male, 51% female).

A.1.9 Sexual orientation

The below table provides an overview of the sexual orientation of the population within Havering compared to Greater London and England. Data is unavailable at LIA level.

Table A.9: Population by sexual orientation

Sex	Havering	Greater London	England
Straight or Heterosexual	91%	86%	89%
Gay or Lesbian	1%	2%	2%
Bisexual	1%	2%	1%
Other	0.3%	1%	0.3%
Not answered	7%	10%	8%

Source: ONS Census, 2021

The above table outlines that the proportion of the population who are straight/heterosexual within Havering (91%) is considerably higher than within Greater London (86%) however broadly in line with England as a whole (89%). In addition, the proportion of the population who are gay or lesbian within Havering (1%) is broadly in line with both regional (2%) and national (2%) proportions. Similarly, in Havering 1% of the population are bisexual, in line with both Greater London (2%) and England (1%).

A.1.10 Socioeconomic data

The below tables provide an overview of the socioeconomic status of the population within Havering compared to Greater London and England. Data is unavailable at LIA level for tables A.10 and A.11.

Table A.10: Employment status of the working age population

Location	Havering	Greater London	England
% of working age population employed	82%	75%	76%
% of working age population unemployed	2%	5%	4%

Source: ONS Annual Population Survey, 2023

The above table outlines that the proportion of the working age population in employment within Havering (82%) is considerably higher than figures within Greater London (75%) and England as a whole (76%). In addition, the proportion of the working age population in unemployment within Havering (2%) is broadly in line with England (4%) but slightly lower than Greater London (5%).

Table A.11: Economic activity rates of the population

Location	Havering	Greater London	England
Economic activity rate - 16 to 64 year olds	83%	80%	79%
Employment rate - 16 to 64 year olds	80%	76%	76%
Unemployment rate - 16 to 64 year olds	3%	5%	4%

Source: ONS Annual Population Survey, 2023

The above table outlines that the economic activity rate of 16-64 year olds within Havering (83%) is slightly higher than within Greater London (79%) and England as a whole (79%). The employment rate (80%) is also considerably higher than regional (76%) and national proportions (76%). This therefore indicates that high levels of employment exist within the Borough of Havering.

The below table provides an overview of the population by deprivation quintile, according to the Index of Multiple Deprivation (2019).

Table A.12: Population by deprivation quintile

Location	LIA	Havering	Greater London	England
Most deprived quintile	21%	8%	17%	20%
Second deprivation quintile	18%	18%	33%	20%
Third deprivation quintile	55%	28%	23%	20%
Fourth deprivation quintile	7%	25%	16%	20%
Least deprived quintile	0%	22%	11%	19%

Source: ONS Census Population, 2021 and MHCLG 2019 Indices of Multiple Deprivation

The above table outlines that the proportion of the population who reside within the most deprived quintile within the LIA (21%) is considerably higher than within Havering (8%) and slightly higher than Greater London (17%). The proportion is also broadly in line with England as a whole (20%). Overall, 100% of the population within the LIA reside within the top four deprivation quintiles, which is considerably higher than proportions within Havering (78%), Greater London (89%) and England (81%). Therefore, the data indicates that considerably high levels of deprivation exist within the LIA.

B. Public consultation events

B.1 Public Consultation

There have been five stages of public consultation to date for the overall redevelopment, undertaken by the JV up to 2019 and the Council in 2022. These stages took place in September 2018, November 2018, May 2019, September 2019 and October 2022.

Throughout the September 2018 to May 2019[27] consultation period:

- 899 residents have engaged;
- There has been coverage in the Romford Recorder and Yellow Advertiser;
- 23,000 letters and 55,000 emails have been sent to publicise the exhibition; and
- There have been 24 hours of face-to-face community engagement.

During the third stage of consultation:

- There were 391 attendees.
- 189 feedback forms were completed. and
- There were 9 hours of direct engagement.

The majority (92%) of respondents lived locally, with 19% working locally and 17% being a member of a local group. Note that residents were able to tick more than one response, meaning the results cannot total 100%.

While the majority were local, respondents were from as far north as Lambourne End, as far south as Rainham, as far east as Ingrave, and as far west as around Newbury Park.

According to the feedback obtained from the consultation, the greatest support was for the community centre aspect of the proposal, with nearly 80% of respondents strongly supporting this. Similarly, the healthcare centre was a well-supported aspect, with over 80% of respondents either supporting or strongly supporting this. The least supported aspect of the proposal was the new homes for Romford, including a range of affordable homes, with less than 60% of respondents either supporting or strongly supporting this aspect. In addition to this, the range of commercial spaces, including affordable workspace and cafes, had a larger proportion of respondents opposing the aspect than many of the other aspects.

Overall, having viewed the proposals, 70.9% of residents support the emerging plans for Bridge Close, while 10.6% do not support the plans, and the remaining 18.5% are either undecided or neutral regarding the plans.

B.2 Final Consultation- October 2022

In October 2022, public consultation continued with the fifth and final public consultation event, split over three days. The consultation took place both online and in person. This final public consultation focused on the masterplan and key facets of the proposed development.

427 local people attended the fifth stage of consultation in October 2022, and 21 feedback forms were received.

[27] Results for the September 2019 public consultation event were not available at the time this report was authored.

During the October 2022 consultation, a key point of discussion were concerns from HICC members as to a lack of reference on the materials and a lack of clarity on how their existing facility will be re-provided. As a result of this feedback, the Council have worked to extend plans to include a new space for the HICC at 222-226 South Street. An Addendum EqIA was drafted to identify the equality impacts from this change to the planning.

C. Literature Review

C.1 Impacts on residential properties and community resources

C.1.1 Health effects associated with relocation

Children and young people are particularly vulnerable to the disruption caused by involuntary relocation. Relocation can create a great deal of stress and anxiety amongst children and young people due to the need to adapt to new routines, facilities and surroundings. Research has found that as the travel distance to school increases, the choice of transportation mode often shifts from active transport such as cycling and walking to more sedentary transports such as vehicular transport.[28]

It has been found that children are likely to develop better in stable environments with a degree of routine and that sudden and dramatic disruptions can be both stressful and affect feelings of security.[29] Changing a new school can disrupt children's academic skills as well as emotional functioning.[30] Evidence outlined by the Centre for Population Change has indicated that, where residential moves are accompanied by school moves, moving is associated with lower socio-emotional wellbeing.[31] Additionally, school moves are associated with a weaker educational performance within secondary school, particularly for children from disadvantaged backgrounds, due to disrupted learning.[32]

For **older people**, research indicates that physical isolation, a lack of social resources and a removal of familiarity, all of which can be associated with moving home, can contribute to feelings of isolation and loneliness.[33] This can potentially lead to negative health impacts such as poorer mental health, a higher likelihood of developing certain health conditions (e.g. obesity and alcoholism) and a greater risk of hospitalisation.[34] For many older adults, they might have lived in the same house over many years of their life, meaning that relocation will severely disrupt their routines, rituals, and surroundings.[35] This may contribute to a condition known as relocation stress syndrome, or transfer trauma.

Disabled people may struggle with routine changes, unsuitable housing, and loss of social support, all contributing to greater isolation. [36] For those with **autism, physical impairments, persons with a visual impairment and mental health conditions**, relocation may cause a disruption of the social networks which many rely on to maintain their standard of living.[37] Changes, both minor and major, to their routines and surroundings may adversely affect feelings of security and comfort. Research shows that some people on the autism spectrum, tend to prefer set routines (such as traveling via the same routes) and rigid structures (such as

[28] Department for Transport (2020): '*National Travel Survey 2019?*'
[29] Autism Learn & Play Inc (2024) The Importance of Routine and Structure for Autistic Individuals. Available at: The Importance of Routine for Children on the Autism Spectrum Why Structure Matters - Autism Learn & Play Inc.
[30] MacArthur Foundation (2020): '*Moving home during childhood: is it harmful?*'
[31] Centre for Population Change (2020): '*Moving home during childhood: is it harmful?*'
[32] The Centre for Social Justice (2016): '*Home Improvements, a social justice approach to housing policy'*
[33] Philip, K. et al (2020) *'Social isolation, loneliness and physical performance in older adults: fixed effects analyses of a cohort study';* NHS (2022) Loneliness in older people. Available at: Loneliness in older people - NHS
[34] IoTUK (2017) '*Social Isolation and Loneliness in the UK'*
[35] Companions for Seniors (2021) 'Relocation Stress Syndrome: The Dangerous Costs of Uprooting the Elderly*'*
[36] Daily Caring (2024) 13 ways to create a dementia-friendly environment at home. Available at: 13 Ways to Create a Dementia-Friendly Environment at Home – DailyCaring; Sense (2021) Fear of mental health crisis as loneliness rises dramatically amongst disabled people. available at: Loneliness rises dramatically among disabled people - Sense
[37] National Autism Society. (2017): '*Moving house'*

preferences to room layouts or objects) as they can help to bring order to their daily life so that they know what is going to happen and when.[38] Similarly, for those with dementia or Alzheimer's, learning about and interpreting new environments can be difficult, and relocation can create feelings of dissonance, confusion and discomfort.[39]

Individuals from **ethnic minority backgrounds** disproportionately rely on social networks for their wellbeing when compared to other ethnic groups.[40] According to research, community and faith organisations are often perceived as places where people of ethnic minority backgrounds felt comfortable and affirmed within their own culture.[41] In addition to a sense of community, these organisations can help promote health and wellbeing by being settings where health messages can be transmitted to individuals and communities.[42] Furthermore, the relocation of people from ethnic minority backgrounds may give them less exposure to health messages and isolate them, negatively impacting their health.

Relocation can also result in adverse health effects on those who are **pregnant.** Evidence suggests that disruption to prenatal care can have detrimental health impacts a pregnant person.[43] Specifically, disruptions in prenatal care resulted in clinically elevated depression, anxiety, and pregnancy-related anxiety symptoms.[44] Should relocation result in the need to make changes to preestablished prenatal services and relationships, this could negatively impact pregnant individuals.

C.1.2 Loss of social cohesion associated with relocation

The redevelopment process can involve the temporary or permanent resettlement of residents and the demolition of housing and community resources. As a result, this could potentially lead to the risk of loss of social cohesion and temporary or permanent access to this amenity provision, which can furthermore increase residents' distances from facilities or places of social connection located on or in close proximity to their neighbourhood. This can impact on all parts of the community, but can have a disproportionately negative effect on **children, older people, disabled people, people who are pregnant, people from ethnic minority backgrounds** and **people from minority faith groups.**

Instability caused by involuntary relocation has the potential to be particularly disruptive to children**.** Such disruption can be attributed to stress and anxiety relating to changing schools and adapting to new routines, staff, facilities and peers. It is generally accepted that children develop better in stable environments; therefore, sudden and dramatic disruptions can be stressful and affect feelings of security.[45]

Evidence outlined by the Centre for Social Justice has indicated that where residential moves result in school moves for older children, the impact can be severe. It suggests school moves

[38] National Autistic Society (2020): *' Dealing with change - a guide for all audiences'*

[39] National Institute for Health and Care Research (2022): 'Dementia patients struggle with change because of damage to general intelligence brain networks'

[40] Multicultural Resource Centre (2024) How Multicultural Resource Centres Empower Ethnic Minorities. Available at: How Multicultural Resource Centres Empower Ethnic Minorities; UCL (2023): 'Covid pandemic disproportionately affected children in BAME families by exacerbating inequalities'

[41] UCL (2023): 'Covid pandemic disproportionately affected children in BAME families by exacerbating inequalities'

[42] Ali, P. (2021): 'Places of worship can be health promotion spaces for faith-based black, Asian and minority ethnic (BAME) communities'

[43] Frontiers in Global Women's Health (2021): 'Prenatal Care Disruptions and Associations With Maternal Mental Health During the COVID-19 Pandemic'

[44] Frontiers in Global Women's Health (2021): 'Prenatal Care Disruptions and Associations With Maternal Mental Health During the COVID-19 Pandemic'

[45] Merrick, M.T., Ports, K.A., Guinn, A.S. and Ford, D.C. (2020) Chapter 16 – Safe, stable, nurturing environments for children. Available at: Safe, stable, nurturing environments for children - ScienceDirect

can disrupt learning and are associated with weaker educational performance within secondary school, particularly for children from disadvantaged backgrounds. [46] Only 27% of students who move secondary schools three times or more achieve five A* to C grade GCSEs, compared to the national average of 60%.

Children with autism spectrum conditions may also find new routines, expectations, and social relationships of a new school environment to be especially challenging, which can have further negative effects on educational attainment and wellbeing.[47]

Relocation can often mean a longer journey travelling to school, which can result in negative effects on health and well-being due to increased time spent inactive. Research has found that the travel distance to school influences the transportation mode choice of children, and longer distances can result in a change from active transportation such as cycling or walking, to sedentary transportation, such as vehicular transport.[48]

Relocation can result in a loss of community links and create feelings of isolation, particularly amongst older people**.** This group are especially vulnerable to loneliness and social isolation, in turn having a serious effect on their health and wellbeing.[49] Local amenities and services which are demolished or closed during the scheme may impact older people who find it challenging to travel further distances to access these resources. Lack of access to community facilities has also been found to have negative health and wellbeing effects on older people as loneliness can increase the likelihood of premature mortality by 26%.[50]

Relocation has the potential to cause stress, anxiety and uncertainty for disabled people. Changes to routines and their surroundings may impact feelings of security. For example, research shows that people on the autism spectrum tend to prefer set routines in order to minimise overstimulation in day-to-day experiences.[51] Similarly, for those with dementia or Alzheimer's, interpreting new environments can create feelings of dissonance, confusion and discomfort.[52]

The loss of community links may also have a disproportionate impact on disabled people. Research by the national disability charity Sense has found that almost two-thirds of disabled people are now chronically lonely.[53] As disabled people can experience more barriers in forming and maintaining social connections, the loss of existing social connections through relocation and loss of local social resources may further exacerbate rates of loneliness, harming their mental health and wellbeing.

Relocation may also create stress for people with disabilities regarding the accessibility of their new home. Fewer than one in eight homes in England have all four accessibility features that

[46] The Centre for Social Justice (2016) Home Improvements, A Social Justice Approach to Housing Policy. Available at: Home-Improvements-full-report.pdf

[47] Autism Learn & Play Inc (2024) The Importance of Routine and Structure for Autistic Individuals. Available at: The Importance of Routine for Children on the Autism Spectrum Why Structure Matters - Autism Learn & Play Inc.

[48] Macdonald, L., McCrorie, P., Nicholls, N. and Olsen, J. R. (2019) 'Active commute to school: does distance from school or walkability of the home neighbourhood matter? A national cross-sectional study of children aged 10-11 years, Scotland, UK', *BMJ Open,* 9 (12). Available at: Active commute to school: does distance from school or walkability of the home neighbourhood matter? A national cross-sectional study of children aged 10–11 years, Scotland, UK - PMC

[49] NHS (2022) Loneliness in older people. Available at: Loneliness in older people - NHS

[50] Public Health England (2018) Health matters: community-centred approaches for health and wellbeing. Available at: Health matters: community-centred approaches for health and wellbeing - GOV.UK

[51] Embrace Autism (2018) What makes autistic people like routine? Available at: What makes autistic people like routine? | Embrace Autism

[52] Daily Caring (2024) 13 ways to create a dementia-friendly environment at home. Available at: 13 Ways to Create a Dementia-Friendly Environment at Home – DailyCaring

[53] Sense (2021) Fear of mental health crisis as loneliness rises dramatically amongst disabled people. available at: Loneliness rises dramatically among disabled people - Sense

mean they can be visited by someone with access needs.[54] This suggests that disabled people are at risk of living in unsuitable accommodation, particularly following relocation.

Research has found that nearly a third of veteran's experience loneliness, which is higher than the general population estimates for Great Britain.[55] Therefore, changes in access to resources which promote social connection are likely to adversely affect this group. It has been suggested that the rates of loneliness reflect the older age profile of veterans, further demonstrating that older people are more likely to be at risk of loneliness.

Ethnic minority and minority faith groups are also likely to experience adverse effects due to a loss of social cohesion following relocation. It has been found that these groups are more reliant on social networks, faith and cultural facilities in order to maintain their standards of living.[56] They are likely to have concerns over loss of social networks and facilities, as well as fears of isolation, harassment or language barriers in new locations.

Evidence also suggests that relocation during pregnancy can harm maternal wellbeing. Having a supportive social network can reduce stress, depression and anxiety, improve physical health and reduce risks of complications.[57] Relocation and a loss of social networks can therefore affect health and wellbeing outcomes for pregnant women.

C.1.3 Access to affordable housing

The need for residents to relocate can cause difficulty in accessing affordable housing. Access to the required finance to obtain new housing may be most limited for those at risk of financial exclusion, who have trouble trying to access appropriate and mainstream financial services, such as bank accounts, loans, and mortgages. This is also exacerbated by the increasing unaffordability of homeownership for many people in England and Wales in recent years.[58] Only 51% of households in London own their homes, and housing in the London Borough of Newham has become considerably less affordable in the last five years.[59]

Rates of homeownership have fallen significantly for **young people** over the last 20 years due to the increasing unaffordability of housing in the country. Increases in property prices relative to incomes have made it more difficult to save for a deposit or access a mortgage, whilst a lack of social housing investment has made it more difficult to access affordable rented properties.[60]

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[54] Centre for Ageing Better (2025) The state of accessible housing – Accessible Homes Factsheet 2025. Available at: The state of accessible housing - Accessible Homes Factsheet 2025 | Centre for Ageing Better

[55] Office for National Statistics (2022) Veterans' Survey 2022, demographic overview and coverage analysis, UK: December 2023. Available at: Veterans' Survey 2022, demographic overview and coverage analysis, UK - Office for National Statistics

[56] Multicultural Resource Centre (2024) How Multicultural Resource Centres Empower Ethnic Minorities. Available at: How Multicultural Resource Centres Empower Ethnic Minorities

[57] Al-Mutawtah, M., Campbell, E., Kubis, H-P. and Erjavec, M. (2023) 'Women's experiences of social support during pregnancy: a qualitative systematic review', *BMC Pregnancy and Childbirth,* 23 (782). Available at: Women's experiences of social support during pregnancy: a qualitative systematic review | BMC Pregnancy and Childbirth | Full Text

[58] Office for National Statistics (2018): 'Housing affordability in England and Wales- 2018'. Available at: https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2018

[59] Mayor of London (2020): 'Housing in London- 2020'. Available at: https://data.london.gov.uk/dataset/housing-london; Office for National Statistics (2019): 'Housing affordability in England and Wales- 2019'. Available at: https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2019

[60] Institute for Fiscal Studies, (2018). 'Barriers to homeownership for young adults'. Available at: https://www.ifs.org.uk/publications/13475

Women are disproportionately represented among lone parent households. Around 90% of single parents are women and have the highest poverty rate amongst working- age adults, with 43% living in poverty (rising to 51% in London).[61] This makes the risk of financial exclusion higher as women who are single parents are more likely to spend a higher portion of their income on housing costs.

People from ethnic minority groups, particularly Pakistani or Bangladeshi households, are more likely to live in low-income households after housing costs and ethnic minority groups in general are more likely to have higher housing costs.[62] Older people have lower average incomes than working-age people and may also struggle to find new homes they can afford.[63]

Disabled people may be impacted by the availability of affordable homes when moving to new areas, as they are more likely to live in poverty.[64]

Disabled people are also less likely to be able to own their own home and are more likely to rent social housing than those who are not disabled.[65] Whilst some shared ownership homes are specifically designed to be accessible for disabled people, only 1.1% of households who purchased a shared ownership home in London in 2017/18 included a disabled household member, likely due to the cost. Indeed, 36% of Londoners who live in families where someone is disabled live in poverty, after housing costs are paid.[66]

Disabled people who live in social housing could experience particularly acute effects. The 'removal of the spare room subsidy' or 'bedroom tax' in 2013 has had a disproportionate impact on disabled people in social housing; two thirds of those affected have a disability. Research shows that disabled people have found it difficult to take up proposed mitigation measures, such as taking up work, working longer hours or downsizing, and thus have had their income reduced by £12 to £22 per week, depending on the number of spare bedrooms. These changes have resulted in increased poverty and adverse effects on health, well-being and social relationships of disabled residents in social housing.[67]

Members of the **LGBTQ+** community may also be affected by the availability of affordable housing when relocating to a new area. Research conducted within the World Habitat Report[68] outlines that personal experiences alongside wider institutional failures cause LGBTQ+ groups to disproportionately experience housing issues. One in five LGBTQ+ renters have experienced

[61] Gingerbread (2019). 'Single parents- facts and figures'. Available at: https://www.gingerbread.org.uk/what-we-do/media-centre/single-parents-facts-figures/ ; Gingerbread (2020). 'Living standards and poverty. Available at: https://www.gingerbread.org.uk/policy-campaigns/living-standards-and-poverty/

[62] Shankley, W. and Finney, N. (2020) *Ethnic minorities and housing in Britain,* Byrne, B., Alexander, C., Khan, O., Nazro, J., Shankley, W. (eds.) Ethnicity and Race in the UK. Bristol University Press: Policy Press.; The Health Foundation (2024) Inequalities in Housing Affordability. Available at: Inequalities in housing affordability | The Health Foundation

[63] Age UK (2024) *Poverty and financial disadvantage in later life.* Available at: poverty-and-financial-disadvantage-in-later-life-briefing-2024.pdf (ageuk.org.uk)

[64] Mayor of London (2020): 'Housing in London- 2020'. Available at: https://data.london.gov.uk/dataset/housing-london

[65] The Independent (2019). 'Homelessness amongst ill and disabled people rises 53% in a year, figures show'. Available at: https://www.independent.co.uk/news/uk/home-news/homeless-disabled-ill-rough-sleeping-housing-crisis-a9251756.html

[66] Office for National Statistics (2019): 'Disability and housing, UK- 2019'. Available at: https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/bulletins/disabilityandhousinguk/2019

[67] Moffatt, S., Lawson, S., Patterson, R., Holding, E., Dennison, A., Sowden, S., & Brown, J. (2015). A qualitative study of the impact of the UK 'bedroom tax'. Journal of Public Health, 38(2), 197-205.

[68] World Habitat Report (no date) ' Left out: Why many LGBTQ+ people aren't accessing their right to housing in the UK' Available at: Layout 1 (thinkhouse.org.uk)

discrimination from a landlord or letting agent due to their gender identity or sexual orientation, which can in turn increase barriers to safe, secure and affordable housing.[69]

C.1.4 Access to appropriate and accessible housing

There is an established link between reduced availability of housing and poor living conditions for **children**. In the UK, it is estimated that 3.5 million children are affected by poor quality housing, a higher number proportionally than any other equality group. [70] Out of this number,1.3 million of these children have social housing as the only suitable and affordable type of home for their families.[71]

Furthermore, based on statistics by the English Housing Survey depicts overcrowding to be more common in ethnic minority households compared to White British households, and more prevalent in London in comparison to other areas in the UK.[72] Overcrowded accommodation has been associated with an increased risk of developing respiratory conditions, infections in children.[73] Children who live in overcrowded accommodation also have an increased of injury. For example, bed sharing, which is more likely to occur in overcrowded houses, has been identified as a factor contributing to Sudden Infant Death Syndrome (SIDS).[74] Overall, overcrowded, poor living conditions have the potential to cause stress and negatively impact.[75]

Disabled people, particularly those with a mobility impairment, may be disproportionately disadvantaged when finding new housing. When relocating, only 4% of those with mobility impairments found suitable accommodation with ease. Additionally, some disabled people have also experienced difficulty with local authorities being reluctant to fund adaptations that would enable them to live independently.[76] Research from the Equality and Human Rights Commission found a severe lack of accessible housing in the UK, with only 7% of UK homes offering the basic four accessibility features to make a home fully liveable; level access to the entrance, a flush threshold, sufficiently wide doorways and circulation space, and a toilet at entrance level.[77]

In addition, ethnic minority groups are more likely to live in intergenerational houses due to cultural norms and are more likely to face barriers to accessing appropriate housing that meets this need, with this group more likely to live in overcrowded housing than white British

[69] HQN (2022) 'One in five LGBTQ+ private renters 'experienced discrimination' from a landlord or letting agent' Available at: One in five LGBTQ+ private renters 'experienced discrimination' from a landlord or letting agent - HQN (hqnetwork.co.uk)

[70] UK Parliament, House of Commons Library (2021): 'Overcrowded housing (England)'

[71] National Housing Federation (2021): Available at: https://www.housing.org.uk/news-and-blogs/news/1-in-5-children-need-new-home/#:~:text=Two%20million%20children%20(1.96%20million,report%20on%20England's%20housing%20crisis.

[72] National Housing Federation (2021): Available at: https://www.housing.org.uk/news-and-blogs/news/1-in-5-children-need-new-home/#:~:text=Two%20million%20children%20(1.96%20million,report%20on%20England's%20housing%20crisis.

[73] House of Commons Communities and Local Government Committee (2011) 'Regeneration Sixth Report of Session 2010–12'. Available at: https://publications.parliament.uk/pa/cm201012/cmselect/cmcomloc/1014/1014.pdf

[74] The Child Safeguarding Practice Review Panel (2020) 'Out of routine: A review of sudden unexpected death in infancy (SUDI) in families where the children are considered at risk of significant harm'. Available at: https://publications.parliament.uk/pa/cm201012/cmselect/cmcomloc/1014/1014.pdf

[75] National Children's Bureau (2016): 'Housing and the health of young children: Policy and evidence briefing for the VCSE sector'. Available at: HYPERLINK "https://www.ncb.org.uk/sites/default/files/field/attachment/Housing%20and%20the%20Health%20of%20Young%20Children.pdf"https://www.ncb.org.uk/sites/default/files/field/attachment/Housing%20and%20the%20Health%20of%20Young%20Children.pdf

[76] Leonard Cheshire Disability. (2014): 'The hidden housing crisis'

[77] Department for Communities and Local Government (2015): 'English Housing Survey: Adaptations and Accessibility Report'

households.[78]. Low-income families are far more likely to live in inappropriate homes that are unsafe, in disrepair, and damp.[79]

C.1.5 Health and wellbeing impacts caused by changes to general environmental conditions

Children are differentially impacted by changes in noise levels, as due to ongoing cognitive and physical development, children are less able to cope with changes within their environment and therefore experience excess stress. Disturbances in noise exposure are further outlined to disproportionately impact children within deprived areas. Similarly, emerging research surrounding **dementia**, which is prevalent amongst **older people**, points to how excess noise disturbances can cause a sensory overload and extreme confusion amongst individuals.[80]

Older people, **children, pregnant people and disabled people** are more likely to be impacted by the changes in air quality that are associated with the demolition and construction phase of the redevelopment. Older people are more likely to have respiratory or cardiovascular illness when compared to the rest of the population, making them more susceptible to the effects of air pollution. Those with COPD (Chronic Obstructive Pulmonary Disorder) are particularly at risk. During development, children have faster breathing rates as their lungs are still developing. In areas of high pollution, children's acquired dose of pollution is therefore higher. [81] Air pollution exposure during pregnancy can also have significant impacts upon maternal health, as it has been linked to an increased risk of pre-eclampsia, a serious cardiovascular condition of pregnancy.[82] Research also outlines that disabled people with heart or lung conditions are particularly vulnerable to serious negative health outcomes linked to reduced air quality.[83]

As mentioned previously, relocation can create a great deal of **stress and anxiety** amongst **children and young people** due to the need to adapt to new routines, facilities and surroundings.[84] Research driven by the charity Mind further reiterates this, stating that stress surrounding housing situations can cause effects such as lack of sleep, which further contribute to a vicious cycle of poor mental health.[85] Coined 'relocation stress syndrome', the stress of relocating may also cause negative effects such as anxiety, depression and loneliness amongst elderly people. [86]

[78] Ministry of Housing, Communities and Local Government (MHCLG) (2023) *English Housing Survey.* Available at: Overcrowded households - GOV.UK Ethnicity facts and figures (ethnicity-facts-figures.service.gov.uk); ONS (2021); Families in England and Wales, Census 2021. Available at: Families in England and Wales - Office for National Statistics

[79] Ministry of Housing, Communities and Local Government (MHCLG) (2023) *English Housing Survey*. Available at: English Housing Survey 2022 to 2023: housing quality and condition - GOV.UK

[80] Alzheimer's Association (2014) 'Sense and sensitivity' Available at: Sense and Sensitivity (alz.org)

[81] European Environment Agency (2023) 'Air pollution and children's health' Available at: Air pollution and children's health — European Environment Agency (europa.eu); Healthy Children (2023) How Noise Affects Children. Available at: How Noise Affects Children - HealthyChildren.org

[82] Royal College of Obstetricians & Gynaecologists (2022) 'UK Government must stop ignoring impact of air pollution in pregnancy and set air quality targets which protect the health of future generations' Available at: UK Government must stop ignoring impact of air pollution in pregnancy and set air quality targets which protect the health of future generations | RCOG

[83] Department for Environmental Food and Rural Affairs (2013): 'Guide to UK Air Pollution Information Resources'.

[84] Sandstrom, H and Huerta, S (2013): 'The Negative Effects of Instability on Child Development'

[85] Mind (2021) 'Housing and mental health' Available at: How can housing affect mental health? - Mind

[86] Wiyono, H., Sukartini, T. and Mundakir, M., 2019. An overview of loneliness, anxiety and depression level of elderly suspected relocation stress syndrome. Prooceding The 9th International Nursing, pp.609-612.

Stress caused as a result of construction or relocation and loss of social support for **pregnant women,** can lead to a reduction of birth weight.[87] Additionally, research has shown an association between preeclampsia, a pregnancy condition, and air pollution.[88]

C.1.6 Access to finance as a result of relocation

Financial exclusion arises when an individual faces difficulty when trying to access appropriate and mainstream financial services. In the UK, certain groups are particularly vulnerable to financial exclusion, including **young people** not in employment, **disabled people**, **lone parents**, **ethnic minority groups** and **older people**, as it has been found that social exclusion can lead to financial vulnerability.[89]

Young people, particularly those not in employment, may struggle to access housing due to increased property prices relative to incomes which has made it more difficult to save for a deposit or access a mortgage.[90] Rates of homeownership have fallen significantly for young people over the last 20 years due to the increasing unaffordability of housing, as well as increases in property prices relative to incomes which has made it more difficult to save for a deposit or access a mortgage.[91] The rising cost of housing and deposits is also problematic for many young people due to the gap between income and house prices. Consequently, home ownership amongst 16-24-year-olds represent only 0.7% of homeowners in 2022, with many young people now choosing to rent privately.[92] This means that as a group, they may be adversely impacted by the financial implications of relocation.

Older people, especially those who have paid off a previous mortgage or have no recent experience of moving home, have less financial flexibility and savings than those in full time employment.[93] Relocation may therefore cause older people to make use of their savings and investments to secure a new home, further impacting their financial independence and stability. Should older people lack savings to assist with relocation, the range of home ownership options is likely to be narrow.

Those from **ethnic minority backgrounds** are more likely to have limited experience of institutional loan finance.[94] Further, they may have less access to commercial loans due to a poor credit rating or their location in ‘high risk’ postcodes. They may also be less able to access commercial loans due to poor credit ratings or their location in ‘high risk’ postcodes.

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[87] Kramer, M., et al. (2012): 'Housing Transitions and Low Birth Weight Among Low-Income Women: Longitudinal Study of the Perinatal Consequences of Changing Public Housing Policy'. Available at: https://www.ncbi.nlm.nih.gov/pubmed/23078464

[88] Bearblock, E., Aiken, C.E. and Burton, G. J. (2021) ‘Air pollution and pre-eclampsia; associations and potential mechanisms’, *Placenta,* 104, pp. 188- 194. Available at: Air pollution and pre-eclampsia; associations and potential mechanisms - ScienceDirect

[89] Fernández-Olit, B., Paredes-Gázquez, J.D. & de la Cuesta-González, M. (2018). ‘Are Social and Financial Exclusion Two Sides of the Same Coin? An Analysis of the Financial Integration of Vulnerable People.’ Soc Indic Res 135, 245–268. Available at: https://doi.org/10.1007/s11205-016-1479-y

[90] House of Lords (2024) Housing needs of young people. Available at: Housing needs of young people - House of Lords Library

[91] House of Lords (2024) Housing needs of young people. Available at: Housing needs of young people - House of Lords Library

[92] House of Lords (2016): ‘Library Note: Impact of the shortage of housing on young people’. Available at: https://researchbriefings.files.parliament.uk/documents/LLN-2016-0056/LLN-2016-0056.pdf ; Statista Research Department (2023): ’ Age distribution of home owners in England 2022’ Available at: https://www.statista.com/statistics/321065/uk-england-home-owners-age-groups/

[93] Joseph Rowntree Foundation (2007) ‘Demolition, Relocation and affordable rehousing: Lessons from the housing market renewal pathfinders’.

[94] Fair4All Finance (2023) 1 in 5 people from minority ethnic groups experience discrimination due to race when dealing with financial providers finds new report. Available at: 1 in 5 people from minority ethnic groups experience discrimination due to race when dealing with financial providers finds new report - Fair4All Finance

Women are disproportionately represented among lone parent households. Lone parents, 90% of whom are women, are more likely to face higher poverty rates and limited housing options.[95] This makes the risk of financial exclusion higher as women who are single parents are more likely to spend a higher portion of their income on housing costs. This can increase the risk of homelessness, with single mother families accounting for one quarter of all homeless households in London in 2019.[96]

Disabled people may be impacted by the availability of affordable homes when moving to new areas, as they are more likely to live in poverty.[97] Indeed, rising numbers of disabled people are becoming homeless - up 53% in 2019 alone.[98] Disabled people are less likely to be able to own their own home and are more likely to rent social housing than those who are not disabled.[99] Whilst some shared ownership homes are specifically designed to be accessible for disabled people, only 1.1% of households who purchased a shared ownership home in London in 2017/18 included a disabled household member, likely due to the cost.[100]

Disabled people who live in social housing could experience particularly acute effects. The 'removal of the spare room subsidy' or 'bedroom tax' in 2013 has had a disproportionate impact on disabled people in social housing; two thirds of those affected have a disability. Research shows that disabled people have found it difficult to take up proposed mitigation measures, such as taking up work, working longer hours or downsizing, and thus have had their income reduced by £12 to £22 per week, depending on the number of spare bedrooms. These changes have resulted in increased poverty and adverse effects on health, well-being and social relationships of disabled residents in social housing.[101]

C.1.7 Expenses associated with relocation

In addition to access to finance, other costs associated with relocation can have major impacts on certain groups. Research by The Health Foundation UK shows that **young people** are more likely to find housing unaffordable.[102] It found that in 2020, 15% of people aged 16–24 and 13% of people aged 25–34 spent more than a third of their income on housing costs in comparison to 1% of 35–44-year-olds and 8% of 45–54-year-olds. The reason for this is due to older working-age groups generally having higher incomes and therefore a higher likelihood to have lower housing costs due to home ownership status.

Older people are also vulnerable as there may be additional expenses they will have to cover when relocating. In the last 10 years, the affordability of housing has improved across all age groups apart from people over 55 years old.[103] More specifically, the proportion of 55–64-year-

[95] Gingerbread (2019) Single parents facts and figures. Available at: Single parents facts and figures | Gingerbread

[96] Mayor of London (2020): 'Housing in London- 2020'. Available at: https://data.london.gov.uk/dataset/housing-london

[97] Joseph Rowntree Foundation (2019): 'Poverty rates in families with a disabled person'. Available at: https://www.jrf.org.uk/data/poverty-rates-families-disabled-person

[98] The Independent (2019). 'Homelessness amongst ill and disabled people rises 53% in a year, figures show'. Available at: https://www.independent.co.uk/news/uk/home-news/homeless-disabled-ill-rough-sleeping-housing-crisis-a9251756.html

[99] Office for National Statistics (2019): 'Disability and housing, UK- 2019'. Available at: https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/bulletins/disabilityandhousinguk/2019

[100] Office for National Statistics (2019): 'Disability and housing, UK- 2019'. Available at: Mayor of London (2020) 'Intermediate housing: Equality Impact Assessment'. Available at: https://www.london.gov.uk/sites/default/files/intermediate_housing_-_equality_impact_assessment_for_part_1_consultation_response_report.pdf

[101] Moffatt, S., Lawson, S., Patterson, R., Holding, E., Dennison, A., Sowden, S., & Brown, J. (2015). A qualitative study of the impact of the UK 'bedroom tax'. Journal of Public Health, 38(2), 197-205.

[102] The Health Foundation (2023): 'Inequalities in housing affordability'. Available at: https://www.health.org.uk/evidence-hub/housing/housing-affordability/inequalities-in-housing-affordability

[103] The Health Foundation (2023): 'Inequalities in housing affordability'. Available at: https://www.health.org.uk/evidence-hub/housing/housing-affordability/inequalities-in-housing-affordability

olds with unaffordable housing has increased by 25%. Thus, older people can be particularly vulnerable to relocation due to the additional expenses that they would have to cover.

Two-fifths of people from an ethnic minority background live in low-income households and tend to have higher relative housing costs as compared to white British people.[104]

For **people with low incomes** (the bottom 20% or quintile of the income distribution), costs associated with housing could adversely affect their standard of living. Research shows that 26% of households on the lowest incomes spent more than a third of their income on housing costs in 2019/20.[105] In comparison, only 3% of those in the top income quintile spent more than a third of their income on housing costs. This is largely due to housing being less affordable for people on the lowest incomes. Additionally, this inequality is also partly due to there being more people renting either private or social homes in the lower income quintiles, for whom housing tends to be less affordable.

C.1.8 Loss of community resources

The loss of facilities where children can socialise, and play could be particularly detrimental to **children** living in the local area. Demolition and resource relocation could adversely affect access to child social networks. Evidence suggests that early years provision plays an important role in a child's development and that free play in early childhood is a vital experience thorough which child learn social, conceptual and creative skills, as well as increasing their knowledge and understanding of the world.[106] The loss of community facilities used by children can lead to; weakened social ties, disturbed social networks, household disruption, social isolation and a reduction in parent-child interactions.[107]

Community severance is defined as and when an individual is cut off from amenities and social facilities within the local community.[108] Whilst anyone can suffer from community severance, compared to the general population, **older people** are particularly vulnerable.[109] As demolition proceeds, local amenities and services (such as shops, community centres and health facilities) may decide to close. Some community resources may be included in the demolition process. The loss of these resources can have a disproportionately negative effect on older people remaining in the neighbouring areas, who may find it more challenging to travel to new services outside of their neighbourhood.[110] Furthermore, for local businesses, the loss of their traditional customer base following the relocation of residents can force closures, further reducing the choice of services available to people in the community, with older people among the most likely to be affected. Research from Age UK found that reduced access to community facilities can, have serious negative effects on mental health and wellbeing, and increase rates of cardiovascular disease in older people.[111]

The loss of community resources may have a disproportionate impact on **disabled people**. Research by the disability charity Sense has found that almost two-thirds of disabled people

[104] The Health Foundation (2024) Inequalities in poverty. Available at: Inequalities in poverty | The Health Foundation

[105] The Health Foundation (2023): 'Inequalities in housing affordability'. Available at: https://www.health.org.uk/evidence-hub/housing/housing-affordability/inequalities-in-housing-affordability

[106] Majumdar, A. (2020) 'Role of play in child development', *International Journal of Technical Research & Science,* 5 (5), pp. 9 – 16. Available at: (PDF) ROLE OF PLAY IN CHILD DEVELOPMENT

[107] Morris, T, Manley D, Northstone, K, Sabel, C, (2017) 'How do moving and other major life events impact mental health? A longitudinal analysis of UK children'

[108] Age UK (2015): 'Loneliness and Isolation evidence review'

[109] Age UK (2015): 'Campaign to end loneliness: Threat to health'

[110] Centre for Better Ageing (2024) Inequalities in later life: Barriers to accessing local businesses and customer-facing settings. Available at: Inequalities in later life: Barriers to accessing local businesses and customer-facing settings | Centre for Ageing Better

[111] Age UK (2015): 'Campaign to end loneliness): 'Threat to health

experience chronic loneliness.[112] The report also found that for those with a range of impairments, including those with sensory impairments, learning disabilities, autism, physical and mobility impairments, mental health conditions, dementia, head and brain injury, neurological conditions, cancer and HIV; forming and maintaining social connections can be a challenge.[113]

For disabled people, particularly those with autism, dementia or Alzheimer's**,** the relocation and potential closure of community resources may have adverse impacts on their sense of security. Changes to routines may be unsettling and difficult to manage for people with autism.[114] Additionally, learning about and interpreting new environments can be difficult, and can create feelings of dissonance, confusion and discomfort for those with dementia or Alzheimer's.[115]

As the construction phase of the redevelopment begins, local amenities including places of worship and community centres may decide to prematurely close or relocate. Dislocation from cultural and/or religious communities can be concerning for residents belonging to these groups, and relocation can raise fears of isolation, harassment or language barriers in new locations and neighbourhoods, and loss of facilities.[116]

Older people remaining in local areas may be adversely impacted by these changes to local social infrastructure as they find it challenging to access new places of worship relocated to outside their local area.[117] Religious institutions are also important to upkeep within local communities, as they contribute towards social cohesion and wellbeing. Research outlines that Mosques can help the cognitive wellbeing of **older individuals**, as opportunities such as Arabic learning lessons can help healthy mental functioning. Minority religious communities also contribute towards helping raise awareness and prevention of diseases such as Hepatitis, providing awareness whereby cultural or language barriers exist.[118] Health inequalities amongst South Asian ethnic groups are higher, therefore religious institutions that disproportionately represent these groups are significant in providing opportunities for equality.

C.1.9 Emergency Service response reconfiguration

The relocation of emergency services could potentially result in quality of service,[119] making the duration of travel for a patient to get to a medical facility. This may impact those who have a differential need for emergency services, such as **older people**,[120] **disabled people** and **children**[121]. Recent findings report that, on average, within the year 2022 it took 90 minutes for

[112] Sense (2021) Fear of mental health crisis as loneliness rises dramatically against disabled people. Available at: Loneliness rises dramatically among disabled people - Sense

[113] Sense for the Jo Cox Commission on loneliness (2017) 'Someone cares if I'm not there'. Available at: https://www.sense.org.uk/support-us/campaign/loneliness/

[114] NHS (2022) What is Autism? Available at: What is autism? - NHS

[115] Help Dementia (2025) Why do people with dementia struggle to adapt to changes in their environment? Available at: Why do people with dementia struggle to adapt to changes in their environment? – HelpDementia.com

[116] BME Health Forum (2010) 'Good Access in Practice: Promoting community development in the delivery of healthcare'.

[117] A. Power (2008) 'Does demolition or refurbishment of old and inefficient homes help to increase our environmental, social and economic viability'

118 Public Health England (2017) 'Healthy living: mosques' Available at: Healthy living: mosques - GOV.UK (www.gov.uk)

[119] Van Barneveld. (2016): 'The effect of ambulance relocations on the performance of ambulance service providers'

[120] Conroy. (2012):' Quality Care for Older people with Urgent & Emergency Care needs'

[121] Johnson. (2012): 'Child and Provider Restraints in Ambulances: Knowledge, Opinions, and Behaviours of Emergency Medical Services Providers'

an ambulance to arrive for stroke and heart attack victims in England, which has severe impact on the life of the individual in need.[122]

C.1.10 Provision of community and religious resources

The provision of community facilities allows for an improved chance of social connection for **children, older people, disabled people, people from an ethnic minority background** and **pregnant women**. Regeneration of areas can include both continued access to and the creation of Improved provision of affordable and accessible facilities for sports and physical activity would positively impact groups that often face barriers to participation, including older people, disabled people, ethnic minority communities, and those who identify as **LGBTQ+.**[123]

Improved provision of sports facilities has also been linked to reducing crime rates and anti-social behaviour amongst young people, by providing them with something to do and increasing social inclusion. Indeed, 70% of teenagers believe that anti-social behaviour occurs because young people are bored and have little else to do. By providing a diversion, which can lead to personal development in areas such as self-regulation and problem-solving abilities, sports clubs and facilities do lead to a decrease in anti- social behaviour.[124]

Literature exploring the importance of religious places of worship amongst faith communities' points to the importance of religious institutions in providing solidarity, enabling resilience and providing a psychological support network.[125] Faith networks are also beneficial as faith leaders hold great value amongst communities and can help educate communities and reduce inequalities such as health and social inequalities.[126]

C.2 Impacts on business

C.2.1 Potential loss of businesses

Regeneration may result in the permanent loss of business. This has the potential to affect self-employed business owners. In particular, older people and ethnic minority groups may be affected by the loss of business.

Research suggests that **older people** who are made redundant face additional barriers to finding new employment compared to the general population, especially when attempting to secure interviews for potential new positions. This has been exacerbated by the COVID pandemic, whereby older workers were more likely to be made redundant and were two times less likely than workers under 50 to find a new job within six months.[127] Mirroring this, research by Anglia Ruskin University found that older white British men were also 22% less likely to be invited for interview when compared to their 28-year-old counterparts.[128]

[122] Prior, S. (2023) 'Ambulance Delays Affecting Rapid Patient Treatment' Available at: Ambulance Delays Affecting Rapid Patient Treatment (osborneslaw.com)
[123] Assembly, N. I. (2010). 'Barriers to Sports and Physical Activity Participation'.
[124] Sport and Recreation Alliance (2012) 'Game of Life: How Sport and Recreation can help make us healthier, happier and richer'. Available at: http://sramedia.s3.amazonaws.com/media/documents/2d77274e-af6d-4420-bdfb-da83c3e64772.pdf
[125] Refugee Studies Centre, 2013. Local faith communities and the promotion of resilience in humanitarian situations: a scoping survey (ox.ac.uk)
[126] Working with faith groups to promote health and wellbeing (local.gov.uk)
[127] Centre for Ageing Better (2022) 'The State of Ageing 2022' Available at: Work | The State of Ageing 2022 | Centre for Ageing Better (ageing-better.org.uk)
[128] The Prince's Responsible Business Network (2017). 'Factsheet: Why employers need to tackle ageism in redundancy and recruitment processes.' Available at: https://age.bitc.org.uk/sites/default/files/business_in_the_community_factsheet_-_tackling_age_bias_in_processes.pdf

Most of the business premises located on the Bridge Close site contain small businesses. **Older people** may be disproportionately impacted by CPO of small businesses, where self-employment is common. older workers are more likely to be self-employed than younger age groups, with workers aged 60 and over accounting for one in six of all self-employed workers in 2022.[129]

People from ethnic minority groups are more likely to be self-employed in the UK when compared with White people.[130] In 2021, 16.2% of workers in Pakistani and Bangladeshi ethnic groups were self-employed, compared to 13.3% of all workers aged 16 and over.[131]

C.2.2 Impact of redundancy on health and wellbeing

The health and wellbeing of **older people** is likely to be impacted by involuntary unemployment. Impacts of unemployment, such as a lower likelihood or re-employment, loss of income and social severance of work-based interactions, can disproportionately negatively impact this group. These factors can lead to stress related cardiovascular illnesses, of which older workers are at an increased risk.[132] This may be exacerbated as research suggests that older people who are made redundant face additional barriers to finding new employment compared to other age groups, especially when attempting to secure interviews for potential new positions.[133] The Centre for Ageing Better found that when made redundant, workers younger than 50 were almost twice as likely as those aged 50 or over to find a new job within six months.[134]

Disabled people face more barriers when searching for employment compared to those who are not disabled. As a result, 53.2% of disabled people are in employment, compared to 81.8% of non-disabled people. A lack of flexible working has been found to impact employment opportunities for this group.[135] This means that disabled people could be disproportionately impacted by loss of employment, particularly if their current working conditions are difficult to find or replicate elsewhere.

Ethnic inequalities in the labour market affect employment opportunities for ethnic minority groups in the UK. Research has found that 77% of white 16-64 year olds were employed, compared to 69% of 16-64 year olds in other ethnic groups.[136] According to the Chartered Institute of Personnel and Development (CIPD) research, people from ethnic minority communities are significantly more likely to say that people's identity or background can have an effect on the opportunities they are given than White British employees.[137] Altogether, this suggests that employment opportunities following redundancy and regeneration can be limited for ethnic minority groups due to discrimination.

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[129] Centre for Ageing Better (2023) Almost one million more workers aged 65 and above since the new millennium, new analysis reveals. Available at: Almost one million more workers aged 65 and above since the millennium, new analysis reveals | Centre for Ageing Better

[130] House of Commons (2020) Unequal impact? Coronavirus and BAME people. Available at: Unequal impact? Coronavirus and BAME people

[131] GOV.UK (2022) Self-employment. Available at: Self-employment - GOV.UK Ethnicity facts and figures

[132] Gallo, W. T., Bradley, E. H., Falba, T. A., Dubin, J. A., Cramer, L. D., Bogardus Jr, S. T., & Kasl, S. V. (2004).*' Involuntary job loss as a risk factor for subsequent myocardial infarction and stroke: findings from the Health and Retirement Survey'*. American journal of industrial medicine, 45(5), 408-416

[133] Centre for Ageing Better (2020) Supporting Over 50s Back to Work. Available at: supporting-over-50s-back-to-work.pdf

[134] Centre for Ageing Better (2022) The State of Ageing 2022. Available at: Work | The State of Ageing 2022 | Centre for Ageing Better

[135] Chartered Governance Institute UK & Ireland (2022) Potential barriers to employment for disabled people and how they can be overcome. Available at: Potential barriers to employment for disabled people and how they can be overcome

[136] GOV.UK (2023) Employment. Available at: Employment - GOV.UK Ethnicity facts and figures

[137] CIPD (2017) Addressing the barriers to BAME employee career progression to the top. Available at: addressing-the-barriers-to-BAME-employee-career-progression-to-the-top_tcm18-33336.pdf

Involuntary redundancy may also indirectly have a disproportionate impact on **children**. There is a clearly evidenced link between parental unemployment and child wellbeing as redundancy increases the risk of tension and disruption within the family. Consequently, job loss can have detrimental effects on children, including lowered self-esteem and socio-psychological well-being.[138]

C.2.3 Impact on customer bases

Local residents may find that with the announcement of demolition, local businesses and community facilities could start to prematurely relocate. Such relocation may impact the customer base that businesses have accumulated from the local area should the new business premises be further afield from existing customers.

For **older people and disabled people**, especially those who have mobility impairments, the relocation or closure of businesses can reduce accessibility to services and amenities which they rely on, potentially increasing social isolation and negative mental health outcomes.[139]

Market research has found that the cost of acquiring a new customer for small businesses can be six times more than maintaining the same customer.[140] Involuntary relocation of local businesses can therefore adversely impact its local customer base, increasing costs. Research on customer retention has also shown that **ethnic minority**-owned businesses usually attract customers from ethnic minorities in the UK, indicating how ethnic businesses may be more likely to have a focused and local customer base.[141] Any relocation might disrupt local customer base, increasing the overhead costs to obtain new customers and to achieve business continuity.

C.2.4 Financial implications associated with business relocation

London has a shortage of industrial estate land due to a continued decline in industrial and manufacturing activity, with the services sector and associated activity dominating the demand for land and office space.[142] Despite the overall decrease in industrial activity, different areas in London show different trends, with **older people, ethnic minority groups and disabled people** more likely to be impacted by financial implications associated with business relocation.

Research by the Enterprise Research Centre shows that businesses owned by **ethnic minority groups** are more likely to be denied a loan outright when compared to white owned business. Black African owned businesses are four times more likely to be denied a loan outright, Black Caribbean are three and a half times more likely, Bangladeshi are two and a half times more likely and Pakistani are one and a half times more likely.[143] This highlights the difficulties that ethnic minority owned businesses have in securing finance to relocate, potentially forcing business closure.

Research suggests that **older people,** who own a small business,[144] may be disproportionately impacted by relocating to premises of their businesses. Research from the Joseph Rowntree Foundation found that **older people** often lack the same financial means and income flexibility

[138] Brand, J. E. (2015). '*The far-reaching impact of job loss and unemployment*'. Annual review of sociology, *41*, 359-375. Available at: https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4553243/

[139] House of Commons (2024) Accessibility of shops and businesses for disabled people. Available at: Accessibility of shops and businesses for disabled people

[140] Landis, T. (2022). '*Customer Retention Marketing vs. Customer Acquisition Marketing'*. Available at: https://www.outboundengine.com/blog/customer-retention-marketing-vs-customer-acquisition-marketing/

[141] Enterprise Research Centre (2013): '*Diversity and SMEs'.*

[142] CAG Consultants (2017): 'London Industrial Land Demand: Final report' Available at: Introduction (london.gov.uk)

[143] Enterprise Research Centre (2013): '*Diversity and SMEs'.*

[144] Institute of Directors (2017) '*The Age of the Older Entrepreneur*'.

compared with other, younger age groups. Older people also face external barriers to financial resilience in terms of not knowing where to go for financial support.[145]

The relocation of businesses may mean that disabled people struggle with commuting to work or, in the case of having to find a different job, seek employment elsewhere. **Disabled people** face more barriers when searching for employment when compared to those who are not disabled. Disabled people can be constrained by the type of employment that they are able to do, with 36% of disabled people in employment agreeing that this is the case. This figure increases to 66% for disabled people who are looking for work when unemployed. This means that disabled people could be disproportionately impacted by loss of employment, particularly if their current working conditions may be difficult to find or replicate elsewhere.[146]

C.3 Wider regeneration impacts

C.3.1 Improved housing provision

Relocation may also result in better quality homes for residents, some of which may be more energy efficient. **Children** are particularly vulnerable to the effects of fuel poverty as it can impact both their physical and mental health. Compared to children living in appropriately heated homes, those living in cold homes are twice as likely to have respiratory illnesses.[147] Further, children living in cold houses are more likely to experience reduced emotional resilience and educational attainment.[148] In such instances, relocation may improve the mental and physical wellbeing of children.

Older people are particularly vulnerable to the effects of cold housing as they spend 80% of their time in their home,[149] significantly more when compared to the general population. Cold living conditions can impact and exacerbate conditions such arthritis and rheumatism, conditions which disproportionate effect older people.[150] In winter, cold damp conditions can contribute to illnesses such as flu and cold, potentially impacting health outcomes.[151]Consequently, cold housing can increase the likelihood of illness, negative mental health outcomes and ultimately an increased mortality rate.[152] Relocation may therefore improve quality of housing for older people, should this currently be an issue.

In 2021, 19.1% of **ethnic minority** households in England were living in fuel poverty compared to 12.6% of White households (including White ethnic minorities).[153] According to the Race Equality Foundation, fuel poverty is said to be worse in London where basic housing costs are expensive even before the cost of heating a home is taken into consideration.[154] Relocation may therefore benefit this group.

[145] Age UK (2018): 'Financial resilience during retirement: who is well placed to cope with life events?'

[146] Equality and Human Rights Commission (2013). Barriers to unemployment and unfair treatment at work: a quantitative analysis of disabled people's experiences. Available at: https://www.equalityhumanrights.com/sites/default/files/research-report-88-barriers-to-employment-and-unfair-treatment-at-work-disabled-peoples-experiences.pdf

[147] Marmot Review Team. (2011). 'The Health Impacts of Cold Homes and Fuel Poverty'

[148] Poverty and Social Exclusion. (2014). 'Impact of fuel poverty on children'

[149] The Housing and Ageing Alliance. (2013). 'Policy Paper: Health, Housing and Ageing'

[150]The Housing and Ageing Alliance. (2013). 'Policy Paper: Health, Housing and Ageing'

[151] Age UK. (2014). 'Housing in later life'

[152] Marmot Review Team. (2011). 'The Health Impacts of Cold Homes and Fuel Poverty'

[153] Department for Business, Energy and Industrial Strategy (2022): 'Fuel Poverty'. Available at: https://www.ethnicity-facts-figures.service.gov.uk/housing/housing-conditions/fuel-poverty/latest

[154] Race Equality Foundation (2014): 'The Housing Conditions of Minority Ethnic Households in England'. Available at: https://raceequalityfoundation.org.uk/wp-content/uploads/2018/02/housing_briefing_24-final.pdf

Disability charity Scope have highlighted that those with a long-term impairment or condition often consume more energy when compared to others. The charity's research shows that over a third of **disabled people** think that their impairment or condition has an impact on the amount of energy they consume and pay for. For example, those with reduced mobility may be required to use the heating more to stay warm. Overall, households with a disabled person make up 38% of all households in England that are fuel poor.[155] According to the Office for National Statistics (ONS) almost 55% of disabled adults struggled to afford their energy bills.[135] This group may therefore benefit this group with regards to energy efficiency.

C.3.2 Provision of community and religious resources

The provision of community facilities allows for an improved chance of social connection for **children, older people, disabled people, people from an ethnic minority background** and **pregnant women**. Regeneration of areas can include both continued access to and the creation of Improved provision of affordable and accessible facilities for sports and physical activity would positively impact groups that often face barriers to participation, including older people, disabled people, ethnic minority communities, and those who identify as **LGBTQ+.**[156]

Improved provision of sports facilities has also been linked to reducing crime rates and anti-social behaviour amongst young people, by providing them with something to do and increasing social inclusion. Indeed, 70% of teenagers believe that anti-social behaviour occurs because young people are bored and have little else to do. By providing a diversion, which can lead to personal development in areas such as self-regulation and problem-solving abilities, sports clubs and facilities do lead to a decrease in anti- social behaviour.[157]

Literature exploring the importance of religious places of worship amongst faith communities' points to the importance of religious institutions in providing solidarity, enabling resilience and providing a psychological support network.[158] Faith networks are also beneficial as faith leaders hold great value amongst communities and can help educate communities and reduce inequalities such as health and social inequalities.[159]

C.3.3 Safety and security

In the lead up to the regeneration process and during the decanting and demolition of buildings in the area, buildings will be vacated and can fall into disrepair. This can attract unwanted activity, including anti-social behaviour and crime, such as increased vandalism, arson and break-ins.[160]

The potential increase in crime can impact a number of groups in the community who are more likely to be a victim or witness of crime**.** Disabled people, LGBTQ+ people, mixed or multiple ethnic groups, and young people are more likely to be victims of crime.[161]

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[155] Scope (2018): 'Out in the cold'. Available at: https://www.barrowcadbury.org.uk/wp-content/uploads/2018/03/Out-in-the-cold-Scope-report.pdf

[156] Assembly, N. I. (2010). 'Barriers to Sports and Physical Activity Participation'.

[157] Sport and Recreation Alliance (2012) 'Game of Life: How Sport and Recreation can help make us healthier, happier and richer'. Available at: http://sramedia.s3.amazonaws.com/media/documents/2d77274e-af6d-4420-bdfb-da83c3e64772.pdf

[158] Refugee Studies Centre, 2013. Local faith communities and the promotion of resilience in humanitarian situations: a scoping survey (ox.ac.uk)

[159] Working with faith groups to promote health and wellbeing (local.gov.uk)

[160] Power, A. (2010) Housing and sustainability: demolition or refurbishment? Available at: Housing and sustainability: demolition or refurbishment? | Proceedings of the Institution of Civil Engineers - Urban Design and Planning

[161] Census 2021 (2021) Crime in England and Wales, victim characteristics: year ending March 2023. Available at: Crime in England and Wales, victim characteristics - Office for National Statistics

In addition, fear of crime can affect mental health and wellbeing for older people, women, ethnic minority groups and LGBTQ+ people. Research has found that although older people tend to have minimal exposure to crime, they have a high fear of crime.[162] Gender has also been found to impact fear of crime, with data showing that women are more fearful of crime than men.[163] According to GOV.UK, a smaller proportion of white people report a fear of crime compared with ethnic minority groups.[164] Research also demonstrates that LGBTQ+ people often fear crime due to threats to their safety and well-being.[165]

Levels of crime have in part be attributed to the design and condition of the urban environment. Using theoretical approaches such as Rational Choice Theory[166] and Broken Windows Theory,[167] a strong argument has developed which links the design of neighbourhoods and towns to levels of crime and disorder.[168] It has been argued that the opportunity for some forms of crime can be reduced through better thought-out approaches to planning and design of neighbourhoods and towns. For example, concepts such as Crime Prevention Through Environmental Design (CPTED)[169] are more frequently used today to ensure buildings and public spaces are designed in a way that aims to reduce the occurrence of crime and alter the environmental factors that might encourage criminal behaviour. Indeed, evidence suggests that homes built to 'Secured by Design' principles can reduce burglary and crime rates by up to 75%.[170]

Changes to the urban environment that affect crime and disorder can impact on those who are more likely to be a victim or witness of crime; and those who are likely to be adversely impacted by fear of crime.

C.3.4 Employment opportunities and business opportunities

Redevelopment and regeneration can act as a means of promoting economic growth and supporting job creation, providing new business, employment and training opportunities.[171] Development can contribute to urban economic regeneration through attracting investment to the area and revitalising neighbourhoods. It can also facilitate improved connectivity between communities and places of employment and education.

Improved opportunities to access employment and education can help address issues of inequality and improve social mobility. This may particularly benefit the protected characteristic

[162] Monash University (2021) Un-neighbourly? Fear of crime among older people points to social isolation. Available at: Fear of crime among older people points to social isolation – Monash Lens

[163] Johansson, S. and Haandrikman, K. (2021) 'Gendered fear of crime in the urban context: A comparative multilevel study of women's and men's fear of crime', *Journal of Urban Affairs,* 45 (7), pp. 1238 – 1264. Available at: Full article: Gendered fear of crime in the urban context: A comparative multilevel study of women's and men's fear of crime

[164] GOV.UK (2016) Fear of crime. Available at: Fear of crime - GOV.UK Ethnicity facts and figures

[165] Ilse, P.B. and Hagerlid, M. (2024) ''My trust in strangers has disappeared completely': How hate crime, perceived risk, and the concealment of sexual orientation affect fear of crime among Swedish LGBTQ+ students', *International Review of Victimology,* 31 (1). Available at: 'My trust in strangers has disappeared completely': How hate crime, perceived risk, and the concealment of sexual orientation affect fear of crime among Swedish LGBTQ students - Paul Baschar Ilse, Mika Hagerlid, 2025

[166] Felson and Clarke (1998) 'Opportunity Makes the Thief, Practical Theory of Crime Prevention'. Available at: https://pdfs.semanticscholar.org/09db/dbce90b22357d58671c41a50c8c2f5dc1cf0.pdf

[167] Wilson and Kelling (1982) 'Broken Windows: The police and neighbourhood safety'. Available at: https://www.theatlantic.com/magazine/archive/1982/03/broken-windows/304465/

[168] See for example, Monahan and Gemmell (2015) 'Reducing Crime Hotspots in City Centres'. Available at: http://www.bre.co.uk/filelibrary/Briefing%20papers/102417-Crime-Hotspots-Briefing-Paper-v4.pdf

[169] Jeffery (1971) 'Crime Prevention Through Environmental Design'. Sage publications

[170] Secured by Design (2014) 'Secured by Design: Reducing crime by good design'. Available at: https://mbp.co.uk/wp-content/uploads/2017/06/Secured-by-Design-Reducing-Crime-by-Good-Design-reduced.pdf

[171] Gibbons, S., Overman, H. and Sarvimaki, M. (2021) 'The local economic impacts of regeneration projects: Evidence from UK's single regeneration budget', *Journal of Urban Economics,* 122. Available at: The local economic impacts of regeneration projects: Evidence from UK•s single regeneration budget

groups who are more likely to face barriers to employment. High youth unemployment rates in London, which in 2022 stood at 14.2%, highlight the disproportionate benefit that employment opportunities provided by the redevelopment could have on young people.[172] Young men are more likely to be unemployed than young women, with recent statistics highlighting that the Spring 2025 unemployment rate for men aged 16-24 was 15.3% compared with 12.9% of young women.[173]

Similarly, those who are disabled are twice as likely to be unemployed then those who are not. In London, disabled people make up 16% of the working age population, yet 29% of the unemployed population.[174] Analysis of national unemployment trends highlights that the rate of national unemployment is disproportionately high for ethnic minority groups when compared white British people.[175]

Certain groups are more likely to face disadvantages in starting businesses and could benefit from increased opportunities. The British Business Bank has found that women and people who come from ethnic minority backgrounds face systemic disadvantages, even when controlling for a number of factors.[176] However, the proportion of women who run SMEs in the UK has risen to 15%, and nearly half of all early-stage entrepreneurs in the UK were women in 2023.[177] Certain groups are also more likely to be self-employed, and could also benefit from improved business opportunities. In 2021, 16.2% of workers in Pakistani and Bangladeshi ethnic groups were self-employed, compared to 13.3% of all workers aged 16 and over.[178] Research also demonstrates that older workers are more likely to be self-employed than younger age groups, with workers aged 60 and over accounting for one in six of all self-employed workers in 2022.[179]

There is an established link between child wellbeing and parental job status. **Children** that are dependent on adults who gain employment as a result of the scheme may benefit from reduced levels of stress and anxiety and educational attainment.[180]

C.3.5 Improved public realm and provision of urban green space

The ability to access and use the public realm is important to ensuring people feel that they are active members of their community. This includes activities such as using local shops or meeting up with people in a shared space outside close to home.[181]

However, it has been recognised that older people and disabled people are less likely to take part in public life than other sections of the population. Public spaces can be inaccessible, with narrow and uneven pavements, a lack of accessible transport facilities, improperly built ramps, narrow doorways and manual doors.[182] These factors act as barriers to using outdoor, shared

[172] ONS. (2022) Labour Force Survey (July to September 2022)

[173] House of Commons Library (2025). Youth Unemployment Statistics. Available at: SN05871.pdf

[174] ONS. (2022) Labour Force Survey (July to September 2022)

[175] Runnymede Trust. (2016): 'Ethnic Inequalities in London: Capital for All'.

[176] British Business Bank (2020). Alone Together: entrepreneurship and diversity in the UK

[177] House of Commons Library (2024). Business Statistics Research Briefing. Available at: SN06152.pdf

[178] GOV.UK (2022) Self-employment. Available at: Self-employment - GOV.UK Ethnicity facts and figures

[179] Centre for Ageing Better (2023) Almost one million more workers aged 65 and above since the new millennium, new analysis reveals. Available at: Almost one million more workers aged 65 and above since the millennium, new analysis reveals | Centre for Ageing Better

[180] Stevens and Schaller. (2011): 'Short-run effects of parental job loss on children's academic achievement' Economics of Education Review 30(2): 289-299

[181] House of Commons Women and Equalities Committee (2017) Building for Equality: Disability and the Built Environment. Available at: Building for Equality: Disability and the Built Environment

[182] Kapsalis, E., Jaeger, N. and Hale, J. (2022) 'Disabled-by-design: effects of inaccessible urban public spaces on users of mobility assistive devices – a systematic review', *Disability and Rehabilitation: Assistive Technology,* 19 (3). Available at: Full article: Disabled-by-design: effects of inaccessible urban public spaces on users of mobility assistive devices – a systematic review

public spaces. This is particularly harmful for groups who have decreased social activity and social networks.[183] Therefore, access to community facilities is important for groups who are in greater need of social interaction than the general population. When regeneration efforts enhance the accessibility of public spaces, they can foster greater inclusion by enabling more active participation in the public realm.

Redevelopment can include the provision of community gardens and other public green spaces, benefitting older people, children, ethnic minority groups and disabled people. Research reports that urban green space has benefits for physical and mental health.[184] Specifically, green space is important for children's access to play, creativity, socialising and learning opportunities, thus improving their physical, mental, social and emotional development and wellbeing.[185]

Research has also found that in urban areas, ethnic minority groups are more than twice as likely to live within England's most green-space deprived neighbourhoods. It has also been found that children from ethnic minority groups are less likely to spend time outside compared to white children, with 19% of ethnic minority respondents reporting local green space to be accessible, compared to 33% of white respondents.[186] Therefore, the provision of green space following regeneration is likely to benefit this group.

Urban green space may also benefit older people. Evidence suggests that inner-city green space can promote social cohesion and instil a sense of community. Social contact is especially important for the health and wellbeing of older people, as social isolation has been linked to poor health and increased mortality rates.[187]

Green spaces must also be well-designed and maintained for older people to use. Overgrown vegetation and uneven paving can be particularly hazardous for this group, with higher risks of serious injuries from falls.[188] Such experiences can result in this group feeling fearful of urban green space.

Overall, the provision and maintenance of green spaces in urban areas can benefit the health and wellbeing of several groups. However, such spaces must be appropriately managed and maintained to ensure positive outcomes.

C.3.6 Provision of community facilities

The provision of community facilities allows for an improved chance of social connection for **children, older people, disabled people, people from an ethnic minority background** and **pregnant women**. Regeneration of areas can include both continued access to and the creation of Improved provision of affordable and accessible facilities for sports and physical activity would positively impact groups that often face barriers to participation, including older people, disabled people, ethnic minority communities, and those who identify as **LGBTQ+.**[189]

Literature exploring the importance of religious places of worship amongst faith communities' points to the importance of religious institutions in providing solidarity, enabling resilience and

[183] Park, J-H. and Kang, S-W. (2023) 'Social Interaction and Life Satisfaction among Older Adults by Age Group', *Healthcare,* 11(22). Available at: Social Interaction and Life Satisfaction among Older Adults by Age Group - PMC

[184] World Health Organisation (2016) Urban green spaces and health. Available at: Urban green spaces and health

[185] UNICEF (2025) The Necessity of Urban Green Space for Children's Optimal Development. Available at: Necessity of Urban Green Space for Children's Optimal Development.pdf

[186] Friends of the Earth (2020) England's green space gap – how to end green space deprivation in England. Available at: Green_space_gap_full_report_1.pdf

[187] Age UK (2022) Social connections and the brain. Available at: The benefits of social connections | Age UK

[188] Department for Transport (2021) Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure. Available at: Inclusive Mobility. A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure

[189] Assembly, N. I. (2010). 'Barriers to Sports and Physical Activity Participation'.

providing a psychological support network.[190] Faith networks are also beneficial as faith leaders hold great value amongst communities and can help educate communities and reduce inequalities such as health and social inequalities.[191]

[190] Local faith communities and the promotion of resilience in humanitarian situations: a scoping survey (ox.ac.uk)

[191] Working with faith groups to promote health and wellbeing (local.gov.uk)

D. Key support documents reviewed

D.1 Support for affected residential, commercial, and community properties

D.1.1 Business Relocation Strategy 2023

As part of the Business Plan for Bridge Close Regeneration LLP (the “DV”), the Business Relocation Strategy (the “BRS”) sets out the ways which the DV will engage with the commercial occupiers that wish to relocate from the Site to an alternate location. The BRS outlines the offers from the DV and London Borough of Havering (the “Council”) to the businesses, providing advice and assistance on relocation options. Suitable locations which minimise the impact and disruption arising from the need to relocate are provided as options for the commercial occupiers.

A comprehensive assessment of current business occupiers on the Site will be undertaken to address the requirements of existing occupiers. The assessment shall include:

- Identification of demand – reflecting occupiers overall requirements for alternative premises, both within and outside the borough
- Identification of supply – capturing the available options for premises within the Borough and neighbouring boroughs

Analysis and overview – an initial assessment of supply against demand, with identification of any significant issues and/or risks Information from preliminary meetings with businesses and stakeholders, commercial databases and The Valuation Office Agency Rating List has been used by the Council to produce an initial baseline review to ascertain the likely scale of demand for business relation support. The review identified the size and scale of existing occupied sites, business sector insights and market knowledge of current supply of sites and premises required. From their review, the DV has set out the following commitments as support for commercial occupiers:

- The DV has appointed a Commercial Agent to help identify suitable properties for businesses currently on site to relocate.
- Owners and occupiers are being engaged to review their requirements and accommodation parameters.
- Regular scanning of the market for rental, leasehold and freehold properties has taken place since the establishment of the DV.
- Relocation opportunities have been forwarded for consideration by individual owners and occupiers where appropriate and in accordance with individual business requirements.
- While three businesses have been relocated off-site, it is recognized that the availability of property is constrained, primarily due to buoyant demand for industrial property in the wake of changing consumer preferences in favour of online retail with increased demand for warehousing and industrial property as a consequence.
- The Development Manager, the Council, and the Managing Agent continue to use all available market intelligence to review relocation opportunities as they crystalize. This includes assessing Council-owned land and premises that may be identified as surplus to requirements.
- Relocation premises outside of the London Borough of Havering are also being identified.

D.1.2 Land Acquisition Strategy 2022

Commercial Land

The Business Plan for Bridge Close Regeneration LLP (the "DV") conducted a review of commercial land occupiers which included landowners, occupiers and businesses within the Site. The commercial land interests have been allocated into one of the following four tenure categories:

1. Freehold Owner Occupiers

2. Freehold Investment Owners

3. Leaseholders

4. Occupier/minor interests

Both the occupants and owners of the commercial properties are to be managed by the Development Manager with the support of the Council. This collaboration will focus on providing suitable relocation options for the businesses currently operating on the Site. The strategy for providing support to all business owners/occupiers is set out in the Business Relocation Strategy 2023.

Table D-1 The strategy for each occupier identified in the land tenure

Sub-Category	Approach	Process	Structure
Freehold Owner Occupier	1) To attempt to purchase by agreement on the basis of compulsory purchase compensation 2) Use compulsory purchase powers as a last resort	If terms can be agreed, the DV will follow the process below: 1) Survey 2) Written confirmation of offer from the DV 3) Enter into Heads of Terms	The following purchase structures will be considered: 1) Option to Purchase 2) Subject to planning 3) Deferred consideration purchase 4) Unconditional purchase
Freehold Investment Owners	1) To attempt to purchase by agreement on the basis of compulsory purchase compensation 2) Use compulsory purchase powers as a last resort	If terms can be agreed, the DV will follow the process below: 1) Survey 2) Written confirmation of offer from the DV 3) Enter into Heads of Terms	The following purchase structures will be considered: 1) Option to Purchase 2) Subject to planning 3) Deferred consideration purchase 4) Unconditional purchase
Leaseholders	1) To attempt to acquire by agreement. Unless specific priorities are identified, leasehold interests will be acquired through an option agreement exercisable once the freehold interest has been secured or compulsory purchase powers, have been granted. Payment for the	1) Written confirmation of offer from the DV 2) Enter into Heads of Terms	1) Option to purchase. 2) Unconditional purchase if specific priorities are identified

Sub-Category	Approach	Process	Structure
	interest will be equivalent to the Leaseholders entitlement to compulsory purchase compensation. 2) Use of compulsory purchase powers as a last resort,		
Occupier/ minor interests - **Licensees** - **Tenancies at will** - **Illegal occupiers**	1) Secure VP via L&T powers 2) Attempt to secure VP through an agreement exercisable once the freehold interest has been secured or compulsory purchase powers, have been granted. Consideration to be given to any entitlement the occupiers may have to compulsory purchase compensation. 3) Use of compulsory purchase powers as a last resort.	1) Identify priority occupiers 2) Consultation and negotiation 3) Assistance with relocation if required 4) Offers to acquire after superior interests secured, or compulsory purchase powers granted	1) Secure VP via L&T powers 2) Secure VP through commercial negotiation

Source: Bridge Close Regeneration LLP Acquisition Strategy, 2023

D.1.3 Private Residential Land

The DV review of residential land occupiers which within the Site, principally located at 95-147 Waterloo Road and 20-40 Oldchurch Road, and has summarised the residential land interests into the following categories:

1. Freehold Owner Occupiers

2. Freehold Investment Owners

3. Tenants

Stakeholder engagement will also be held with individuals in all three categories to ascertain their specific circumstances and relocation requirements. The management of occupants of the residential properties, including those identified as vulnerable residents, will be done by the Council, with the support of a suitably qualified Resident Liaison Officer.

Table D.2: The strategy for each occupier identified in the land tenure

Sub-Category	Approach	Process	Structure
Freehold Owner Occupier	1) To attempt to purchase by agreement on the basis of compulsory purchase compensation 2) Use compulsory purchase powers as a last resort	If terms can be agreed, the DV will follow the process below: 1) Survey 2) Written confirmation of offer from the DV 3) Enter into Heads of Terms	The following purchase structures will be considered: 1) Option to Purchase 2) Subject to planning 3) Deferred consideration purchase 4) Unconditional purchase
Freehold Investment Owners	1) To attempt to purchase by agreement on the basis	If terms can be agreed, the DV will follow the process below:	The following purchase structures will be considered:

Sub-Category	Approach	Process	Structure
	of compulsory purchase compensation 2) Use compulsory purchase powers as a last resort	1) Survey 2) Written confirmation of offer from the DV 3) Enter into Heads of Terms	1) Option to Purchase 2) Subject to planning 3) Deferred consideration purchase 4) Unconditional purchase
Tenants - **ASTs** - **Other occupiers**	1) Secure VP via L&T powers 2) Attempt to secure VP through an agreement exercisable once the freehold interest has been secured or compulsory purchase powers, have been granted. Consideration to be given to any entitlement the occupiers may have to compulsory purchase compensation. 3) Use of compulsory purchase powers as a last resort.	1) Identify priority occupiers 2) Consultation and negotiation 3) Assistance with relocation if required 4) Offers to acquire after superior interests secured, or compulsory purchase powers granted	1) Secure VP via L&T powers 2) Secure VP through commercial negotiation

Source: Bridge Close Regeneration LLP Acquisition Strategy, 2023

D.1.4 Housing Regeneration Pack, 2018

The Council has produced a Housing Regeneration Pack[192] that sets out its commitments to support residents of Havering throughout its Housing Regeneration Programme, including the redevelopment of the Bridge Close Site. The Regeneration Pack contains several key documents, all of which are based around the following three key themes:

Choice: to ensure regeneration programmes across the borough provide better housing choice for residents. The Council will ensure that residents effected by regeneration will have a range of re-housing options to choose from, including moving back into a property in the regeneration estate once the new homes are built.

Fairness: the Council will be open, transparent and fair when developing and delivering regeneration proposals.

Better housing: to ensure that residents live in better quality housing which reflects their needs.

The Council's commitments

As part of the Housing Regeneration Pack 'Details of Housing Regeneration Scheme'[193] document, the Council have made the following key commitments to Council tenants, freeholders and private tenants currently living on the Site affected by the proposed regeneration programme:

Regular, honest communication: Provide communication about the regeneration proposals throughout the regeneration period through one-on-one meetings, direct letter correspondence,

[192] London Borough of Havering (2018): 'Havering Council's Housing Regeneration Programme: Housing Regeneration Pack'. Available at: https://www.havering.gov.uk/download/downloads/id/1875/details_of_the_housing_regeneration_scheme.pdf
[193] London Borough of Havering (2018): 'Havering Council's Housing Regeneration Programme: Housing Regeneration Pack – Details of Housing Regeneration Scheme;'. Available at: https://www.havering.gov.uk/download/downloads/id/1875/details_of_the_housing_regeneration_scheme.pdf

newsletters, briefings, events, website and email updates, in addition to dedicated points of contact in the Council or representatives.

Dedicated officers: Ensure each household has a dedicated Council Officer to help with each step of the re-housing process and keep residents fully informed about the process and their options.

The Council Officer is able to identify any additional support that may be needed, such as packing and unpacking services, home loss and disturbance compensation claims and payments and answer general queries.

Suitable re-housing offers, tailored advice and an emphasis on 'choice': Ensure that suitable and affordable housing options are available for residents and that the process is as stress-free as possible.

Council tenants will be matched with suitable re-housing options that become available and best meet their housing needs. The Council will offer tailored advice on the suitability of each re-housing option.

No more than two moves for Council tenants during the re-housing process: Seek, as far as is reasonably practicable, to ensure that no tenant should have to move more than twice.

Quality housing advice and support service: Provide a comprehensive housing support and advice package throughout the re-housing process, including organising events and activities to visit regeneration schemes, arranging support groups for residents, helping with claiming benefits, organising skills and training opportunities and liaising with other services (such as schools, social services and health services) to support households at the new address.

Independent advice: Assist residents with additional advice and support on the re-housing process, outside of that offered by the Council, and details on how to access these when requested.

Council Tenants will not be financially worse off: The Council has set out details on entitlements and level of home loss payments, disturbance compensation and reimbursement of reasonably incurred costs.

Developing a range of affordable housing products: Develop a range of products for rent and sale within the schemes to provide a wide range of opportunities for residents.

Keeping the community together: Aim to move groups of vulnerable residents together where possible, to maintain support networks and communities.

Safe and secure environment: Commit to the continued maintenance of each Council residential housing estate to a high standard throughout the period of the regeneration scheme, keeping noise and disruption of building work at a minimum and maintaining site security for the safety of residents.

Temporary use of empty properties on the regeneration Site: Aim to let the empty units on a temporary, non-secure basis to assist with meeting ongoing Council housing demand.

Overall approach to residential relocation

Throughout the re-housing process, the Council will provide the following practical support and general advice for affected Council tenants, freeholders and private tenants[194]:

[194] London Borough of Havering (2018): 'Havering Council's Housing Regeneration Programme: Housing Regeneration Pack – Local Lettings Plan;'. Available at: https://www.havering.gov.uk/download/downloads/id/1875/details_of_the_housing_regeneration_scheme.pdf

- Explain housing options and assess the suitability and affordability of the options based on individual circumstances; Advice on alternative housing providers and letting agencies;
- Advice on accessing solicitors and legal services and getting information on legal rights;
- Advice on legal possession processes and compulsory purchase;
- Help to process Home Loss Payment and Disturbance Compensation claims;
- Help to complete forms and other paperwork;
- Advice on local amenities to support households in moving to their new home, including assisting with setting up links to local support services and schools;
- Viewing support to accompany residents to view alternative council-owned properties and arrange visits to each new development once show home properties become available;
- Assist tenants who are eligible for Housing Benefit Claims when filling out forms and liaising with the housing benefit team;
- Work with the removal contractor to move residents into their new home;
- Work with the relevant providers to ensure that the agreed care package remains in place after a move, in addition to ensuring that residents with support needs have access to services in their new home;
- Work with occupational therapists to arrange for property adaptations at the new address if required; and
- Visit or contact the tenant after re-housing to ensure that the move has gone well and provide additional assistance if required.

Council tenant relocation approach

As part of the Housing Regeneration Pack 'Local Lettings Plan'[195] document, the Council outlines the relocation policy of all Council tenants who will lose their home as a result of the regeneration programme. There are six options available to Council tenants:

- Move to an existing Council property elsewhere within the borough
- Move to an existing Housing Association property elsewhere within the borough
- Move to a sheltered housing or extra-care scheme property elsewhere within the borough (subject to eligibility for the particular scheme)
- Purchase an affordable home elsewhere through a low-cost home ownership scheme
- Rent a property elsewhere with a private landlord
- Move to a new property in the development once complete

Council officers carry out one-to-one meetings with Council tenants to assist with completing the correct forms and to establish the needs of residents. As part of this process, the Council considers the tenant's rehousing preferences with regards to location, bed size requirement, desire to be close to friends and family, health needs (mobility or social risk factors), children's school location and place of employment.

Once this has been considered, the Council tenant is entitled to a maximum of two direct offers of accommodation for relocation.

[195] London Borough of Havering (2018): 'Havering Council's Housing Regeneration Programme: Housing Regeneration Pack – Regeneration Decant Policy and Procedure;'. Available at: https://www.havering.gov.uk/download/downloads/id/1875/details_of_the_housing_regeneration_scheme.pdf

Private tenant relocation approach

According to the Housing Regeneration Pack 'Information for Private Tenants'[196] document, the Council has no formal statutory obligation to rehouse private tenants of leaseholders or freeholders who are currently living in a property affected by the regeneration programme. However, the Council states that it is committed to offering relevant support to enable affected tenants to find a replacement home.

The document highlights that the Council aims to ensure private tenants and their landlords receive regular, open communication about the redevelopment and estimated timescales. The Council strive to assist private tenants to find alternative suitable private rented accommodation through Housing Options and Advice Service. Referrals to local letting agencies and private landlords can be provided by the Council.

Property owners relocation approach

The Housing Regeneration Pack 'Information for Property Owners'[197] document highlights the options available to resident and non-resident leaseholders and freeholders affected by the regeneration programme. :

Resident leaseholders and freeholders

1. The options that are made available to resident leaseholders and freeholders are as follows:
    - Sell the property to the Council and purchase a property elsewhere within or outside the borough through a low-cost home ownership scheme.
    - Sell the property to the Council and purchase a property outright elsewhere within or outside the borough (Open Market Purchase).
    - Sell the property to the Council and move to private rented accommodation with a private landlord within or outside the borough.
    - Purchase a new affordable replacement home in the regeneration area once the development is completed and ready for occupation.

Non-resident leaseholders and freeholders

2. The options that are made available to non-resident leaseholders and freeholders are as follows:
    - Sell the property to the Council and purchase a property elsewhere within or outside the borough through a low-cost home ownership scheme.
    - Sell the property to the Council and purchase a property outright elsewhere within or outside the borough (Open Market Purchase).
    - Sell the property to the Council and move to private rented accommodation with a private landlord within or outside the borough.
    - Purchase a new affordable replacement home in the regeneration area once the development is completed and ready for occupation.
    - Both resident and non-resident leaseholders and freeholders have a dedicated Housing Officer to help throughout the move process. The Officer meets with leaseholders and

[196] London Borough of Havering (2018): 'Havering Council's Housing Regeneration Programme: Housing Regeneration Pack – Information for private tenants;'. Available at: https://www.havering.gov.uk/download/downloads/id/1875/details_of_the_housing_regeneration_scheme.pdf
[197] London Borough of Havering (2018): 'Havering Council's Housing Regeneration Programme: Housing Regeneration Pack – Information for property owners;'. Available at: https://www.havering.gov.uk/download/downloads/id/1875/details_of_the_housing_regeneration_scheme.pdf

freeholders on a one-to-one basis to explain their options, understand their requirements and answer any questions.

Financial assistance and compensation

Home loss and disturbance payments would be available to qualifying occupants, even where the offers are subject to vacant possession. The following provides an overview of financial assistance available to residents as per the Home Loss Payments and Disturbance Compensation document in the Housing Regeneration Pack.[198]

Home loss payments

A home loss payment is a sum in recognition of the inconvenience of having to move out of an existing home and is a statutory compensation measure for qualifying residents. Home loss payments made to those whose homes are not acquired through CPO are made at the discretion of the Council, as they have no statutory duty to make the compensation in cases of private treaty. However, in order to provide support to those whose homes are acquired under agreement, the Council will offer a home loss payment in these cases as well.

Housing Needs Assessment is available for those who require support with sourcing and paying for suitable and affordable rented accommodation. A qualifying resident is entitled to receive the minimum home loss payment.

Disturbance payments

Disturbance compensation is paid where qualifying residents are required to leave their home, to compensate for reasonable financial costs associated with moving and acquiring a new home. The aim of the compensation is to prevent a resident from encountering a situation where they are in a worse financial position as a result of having to move because of the regeneration programme.

Disturbance compensation may be paid for:

- Expenses related to arranging furniture removal, (alternatively the Council would arrange removals and pay for these directly);
- Re-direction of mail for each authorised surname living at the address (for one year);
- Alterations to furnishings, e.g. uplifting, refitting and alteration of carpets and curtains;
- Disconnection and re-connection of services e.g. broadband, phone line and domestic appliances;
- Moveable fixtures and fittings, e.g. light fittings;
- Special adaptations previously assessed as required in the new property;
- Refitting of special locks and alarms;
- Costs of new school uniforms (where a household is rehoused in a new area where children need to change schools);
- Contributions will be made to replacement carpets, curtains, white goods or furniture (reasonable costs allowed if residents can demonstrate existing furnishings, white goods or furniture will not fit in their new home and cannot be modified); and
- Agents and legal fees arising from the grant of a tenancy for a replacement property

[198] London Borough of Havering (2018): 'Havering Council's Housing Regeneration Programme: Housing Regeneration Pack. (7) Home Loss Payments & Disturbance Compensation'. Available at: https://www.havering.gov.uk/download/downloads/id/1874/homeloss_payments_and_disturbance_compensation.pdf

- The above list is not exhaustive and additional reasonable costs incurred by residents may be compensated.

The table below summarises the information on payments and compensation, as per the tenure of the property:

Table D-3: Payments and Compensation Summary

Tenure	Market value of the home	Home Loss Payment	Disturbance Compensation
Council tenant	Not applicable	£8,100 Home Loss Payment	Yes, entitled to claim
Resident Leaseholder	10% above full market value	10% home loss payment at a minimum of £8,100 and maximum of £81,000	Yes, entitled to claim
Freeholder	Full market value	10% home loss payment at a minimum of £8,100 and maximum of £81,000	Yes, entitled to claim
Non-resident Freeholder	Full market value	7.5% basic loss payment at a minimum of £7,500 and maximum of £75,000	Yes, eligible to claim for the legal costs of selling the affected property and acquiring a new home
Non-resident Leaseholder	Full market value	7.5% basic loss payment at a minimum of £7,500 and maximum of £75,000	Yes, eligible to claim for the legal costs of selling the affected property and acquiring a new home
Private tenant	Not applicable	Yes, entitled to claim provided that he/she has occupied the dwelling for a period longer than a year ending on the date of displacement under a qualifying tenancy agreement	Yes, entitled to claim for the costs of moving out of the affected property providing the tenant meets specified criteria
Tenants in the Council's private sector leased (PSL) and Houses in Multiple Occupation (HMO)	Not applicable	Not applicable	Not applicable

Source: Bridge Close Regeneration LLP, Housing Regeneration Pack, 2018. Home Loss payment figures updated in line with UK Government Compulsory Purchase Guidance. Updated 2023; accessed October 2025 via Compulsory purchase and compensation: guide 4 - compensation to residential owners and occupiers - GOV.UK

Support available to commercial properties

The approach to relocation intends to support businesses throughout the process, and includes the following measures:

Review of businesses:

A comprehensive assessment of the current business occupiers on the Site is undertaken in order to address individual requirements. The assessment considers:

- Identification of demand: looking at the overall requirements for alternative premises both within and outside the borough;
- Identification of supply: highlighting the available options for premises within and outside the borough; and
- Analysis and overview: an initial assessment of supply against demand, identifying any significant issues or risks.

Assessment of current supply:

As part of the BRS, the Council considered the currently available alternative commercial premises and sites both within and outside the borough. The initial assessment showed that although some opportunities exist, there is a shortage of immediately available alternative sites. Further interaction between neighbouring boroughs and districts is therefore required to identify suitable alternative sites within a reasonable distance. To minimise impact and disruption to business as much as possible, the following factors will be considered by the Council when assessing potential relocation sites:

- Customer base and location;
- Current and proposed tenure type;
- Employment contribution to the local economy;
- Transportation requirements;
- Current site use and intensification; and

Individual business and investment plans.

Acquisition, compensation and responsibilities of the Development Manager:

In order to complete the acquisition of land interests, the Council will make offers to landowners and occupiers which reflect their entitlement to compulsory purchase compensation and the 'value for money' the acquisition may provide. All businesses will be entitled to compensation, as set out in the statutory compensation code. Where disputes overcompensation offered may arise, consideration will be given to settling such disputes through use of Alternative Dispute Resolution.

The BRS states that the Development Manager will act as a liaison between the and the Council and businesses. The Development Manager will engage with occupiers over relocation issues and will:

- Produce a comprehensive and ongoing assessment of the current occupiers needs and requirements, and potential alternative sites;
- Accurately record all correspondence with businesses;
- Manage third party consultants, including those appointed to offer compensation advice;
- Ensure disturbance to the businesses is minimised, offering support measures where available; and

Work effectively with relevant organisations to ensure that businesses receive up-to-date and reliable information about the relocation process.

Other assistance and support:

The level of support available to businesses will differ on a case-by-case basis, although the following may be included:

- Assistance in identifying appropriate alternative sites within the borough or in neighbouring boroughs;
- Business analysis support to highlight potential future growth potential and business direction; and
- Additional financial support may be offered in advance of taking possession of the business to help facilitate the relocation. This may include:
- Payment of reasonable interim professional fees;
- Early acquisition and leaseback of a business' existing site to allow for a new premises to be acquired and prepared while the business continues to operate at its current location; and

- An option to provide the certainty of an agreed purchase price for an existing property once alternative premises have been identified

E. Engagement

E.1 Engagement

Surveys

A demographic survey of businesses and residents within the Site was undertaken by Mott MacDonald and JTL Research Ltd on behalf of the Council in June 2024.

The objective of the demographic survey was to build better understanding of the businesses and residents that may be affected by the scheme and the ways in which they might be affected. Questions were also asked in order to gauge respondents' awareness of the redevelopment process and how it might affect them, and to gain a better understanding of the potential needs in the area, in order to provide the appropriate support.

The fieldwork surveys were carried out with up to five visits made to each property understood to be occupied on the Site, including both residential properties and business properties. The survey included:

- a notification letter distributed to properties to make participants aware of the upcoming survey, including details for translation support;
- a letter distributed to properties with a unique link to the survey, so they could complete the survey in their own time; and
- in-person visits during day and evening hours, to encourage businesses to complete the survey on a tablet, with the option to complete this in another language.

Residential findings

Table E-1 Residential survey findings

Feedback from residents	Summary of findings
Connection to the property	Tenants were asked to confirm their occupancy type. Out of the 12 households that responded: ● 92% were council tenants (11 households) with the remaining 8% (1 household) an owner occupier with mortgage. Residents were further asked to confirm how long they had been living in their home. Out of the 12 households that responded: ● 1 household (8%) had lived their less than a year, 7 households (58%) had lived in their household for 1-5 years, 3 households (25%) had lived there for 20 + years and 1 household (8%) 11-20 years. Residents were further asked how they would describe their household. Out of the 12 households that responded: ● 3 households (25%) were single person households ● 4 households (33%) were lone parent households ● 4 households (33%) were a couple with dependent children ● 1 household (8%) was another household with non-dependent children ● Residents were further asked how many people usually live at their household. Out of the 12 households that responded: ● 2 households were single person households (16%) ● 1 household was a double person household (8%) ● 2 households were three person households (16%) ● 3 households were four person households (25%) ● 2 households were five person households (16%)

Feedback from residents	Summary of findings
	● 2 households were seven person households (16%) ●
Age	The survey identified that there were 46 individuals living across 12 households. The breakdown of the demographic of these households was as follows: ● 18 individuals (39%) were under 16 years of age ● 7 individuals (15%) were aged 16-24 years ● 3 individuals (7%) were 25-34 years ● 6 individuals (13%) were 35 to 44 years ● 8 individuals (17%) were 45 to 54 years ● 1 individual (2%) was between 55 to 64 years ● 0 individuals were 65 to 74 years ● 2 individuals (4%) were between 75 and 84 years ● 1 individual (2%) was 85 years or over Individuals were further asked what the educational status was of their children if they had under 18 year olds living in their households. Across all 46 residents: ● 3 (7%) were under school age however were intending on being enrolled into a state school in Havering ● 13 (28%) were enrolled within a school or nursery within Havering ● 4 (9%) were enrolled within a private school or nursery within Havering
Disability	The survey identified the proportion of individuals across households with a disability: ● 2 households (17%) contained an individual whose day to day activities were limited by their disability a lot ● 1 household (8%) contained an individual whose day to day activities were limited by their disability a little ● 2 households (17%) contained individuals who had a physical impairment ● 1 household (8%) contained an individual who had learning difficulties ● 3 households (25%) contained an individual with a mental health condition ● 1 household (8%) contained an individual with a long standing illness or condition ● 1 household (8%) contained individuals with other disabilities (arthritis)
Gender reassignment	When asked whether the gender identities of people living in the household were the same as their sex registered at birth: ● 46 (100%) individuals stated yes
Marital status	When asked about the marital status of individuals within their household: ● 9 (20%) individuals never married ● 9 (20%) individuals were single ● 6 (13%) individuals were married ● 1 (2%) individual was separated ● 3 (7%) individuals were divorced ● 2 (4%) individuals were co-habiting ● 2 (4%) individuals were widowed ● 14 (30%) individuals were unanswered for
Pregnancy and maternity	When asked whether any members of the household are pregnant or have been pregnant within the last 12 months of the 11 households that responded: ● 1 household (9%) had an individual that had been pregnant within the last 12 months or was pregnant at the time of response ● 10 households (91%) did not report any members of their household to be pregnant or have been pregnant within the last 12 months.
Race	When asked which ethnic group: ● 18 (40%) individuals were English/Welsh/Scottish/Northern Irish/British ● 4 (9%) individuals were Pakistani ● 5 (11%) individuals were Indian

Feedback from residents	Summary of findings
	● 3 (7%) individuals were Bangladeshi ● 4 (9%) individuals were Chinese ● 5 (11%) individuals were African ● 7 (15%) individuals were an 'Other' ethnic group
Religion	When asked about their religious identification: ● 4 (9%) individuals were Christian ● 26 (57%) individuals were Muslim ● 16 (35%) individuals stated they had no religious beliefs
Sex	When asked about their sex: ● 18 (39%) were male ● 29 (62%) were female
Sexual orientation	When asked how the people within each household identified their sexual orientation, of 46 individuals across 12 households: ● 46 (100%) identified as heterosexual or straight
Socioeconomic status	When asked whether any members of each household received any benefits, out of the 12 households that responded: ● 4 (33%) households stated that member(s) of their household were in receipt of Universal Credit ● 4 (33%) households stated that member(s) of their household were in receipt of Child Tax Credit ● 3 (25%) households stated that they were in receipt of a Housing Benefit ● 1 (8%) household stated that member (s) of their household were in receipt of income support ● 1 (8%) household stated that member(s) of their household were in receipt of Pension Credit ● 3 (25%) households stated that member(s) of their household were in receipt of Council Tax Reduction support.
Language(s) spoken	When asked about the preferred languages of members of each household: ● 1 (8%) household stated Arabic ● 1 (8%) household stated Chinese ● 9 (75%) households stated English ● 1 (8%) household stated Italian
Questions related to residents tenancy	When asked about the number of bedrooms within their property: ● 12 (100%) of household stated they had 3 bedrooms When asked if, at that point in time, the amount of bedrooms was considered to be sufficient: ● 5 (42%) of households stated 'yes' ● 7 (58%) of households stated 'no, overcrowded' When asked if they had had any adaptations made to their home: ● 1 (8%) household stated yes with the adaptation(s) being a banister on the outside garden and handrail installed within the bathroom ● 11 (92%) of households stated 'no'
Attitudes towards redevelopment	When asked how the redevelopment of the site would impact upon the health and wellbeing needs of each household: ● 8 (67%) households stated that it would have a negative impact ● 1 (8%) household stated it would have a positive impact ● 1 (8%) household stated they would need further information ● 1 (8%) household stated that it wouldn't have an impact When asked how the redevelopment of the site impact on the childcare and school provision of young people in each household: ● 5 (42%) households stated it would have no impact ● 5 (42%) households stated it would have a negative impact ● 1 (8%) household stated they would need further information ● 1 (8%) household stated it would have a positive impact

Feedback from residents	Summary of findings
	When asked how the redevelopment of the site will impact on the employment and skills needs of those in each household? ● 8 (67%) households stated it would have no impact ● 3 (25%) households stated it would have a negative impact ● 1 (8%) household stated it would have a positive impact When asked how the redevelopment of the site impact will on the care and support required by members of each household: ● 7 (58%) households stated it would have no impact ● 3 (25%) households stated it would have a negative impact ● 1 (8%) household stated it would need further information ● 1 (8%) household stated it would have a positive impact

Source: Mott MacDonald, 2024

Commercial findings

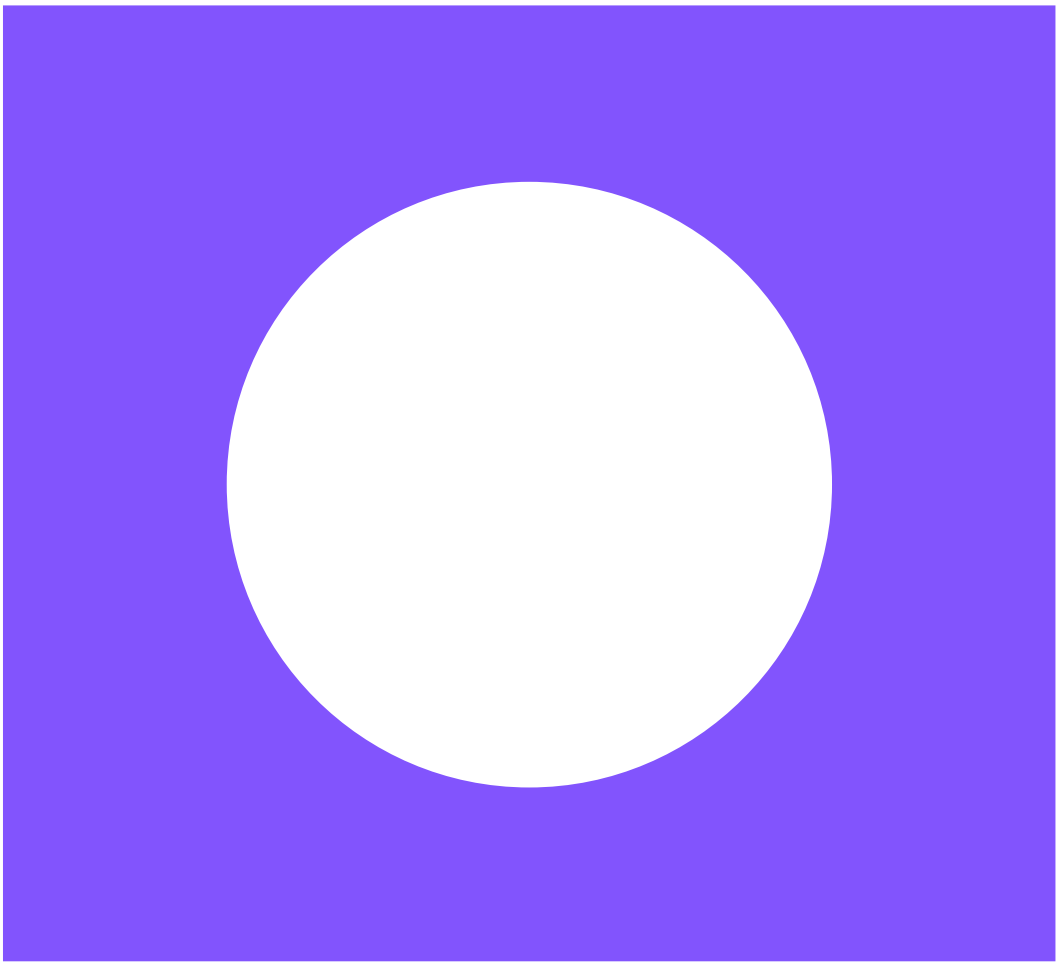
Table E-2 Business survey findings

Feedback from businesses	Summary of findings
General	A total of 10 businesses responded to the survey. When asked 'To what extent are you aware or not about the proposals for Bridge Close and how they affect you?': ● 6 (60%) businesses stated they were fully aware ● 4 (40%) businesses stated they were somewhat aware When asked 'To what extent, if at all, would you say you are concerned about the Bridge Close proposals and their impact on you?' ● 7 (70%) businesses stated they were very concerned ● 1 (10%) business stated they were fairly concerned ● 1 (10%) business stated they were not concerned ● 1 (10%) business stated they would prefer not to say When asked 'To what extent are you satisfied or dissatisfied with the level of communication you have received from the London Borough of Havering Council about the redevelopment process and what it means for you?' ● 2 (20%) businesses stated they were fairly satisfied ● 1 (10%) business stated they would prefer not to say ● 2 (20%) businesses stated they were very satisfied ● 3 (30%) businesses stated they were very dissatisfied ● 1 (10%) business stated they were neither satisfied nor dissatisfied
Business/services provided	When asked 'How long has your business been operating on the estate': ● 3 (30%) businesses stated 20+ years ● 4 (40%) businesses stated 11-20years ● 1 (10%) business stated 1-5 years ● 1 (10%) business stated 6-10 years ● 1 (10%) business preferred not to state When asked does your business provide goods or services specifically tailored to any of protected characteristic groups: ● 5 (50%) businesses stated they would prefer not to say ● 3 (30%) businesses stated they did not know ● 2 (20%) businesses stated there services were tailored to older people When asked where their customer base is generally located: ● 5 (50%) businesses stated within Havering/neighbouring boroughs ● 4 (40%) businesses stated London

Feedback from businesses	Summary of findings
	● 1 (10%) businesses preferred not to say ●
Demographic of business owners	When asked within the demographic survey about their age, 9 businesses responded: ● 2 (22%) representatives were aged 25 to 44 years ● 1 (11%) representative was aged 45 to 54 years ● 3 (33%) representatives were aged 55 to 64 years ● 1 (11%) representative was aged 65 to 74 years ● 1 (11%) representative was aged 75 to 84 years When asked within the demographic survey about the gender identification of business owners: ● 5 (50%) businesses stated male ● 1 (10%) business stated female ● 4 (40%) stated they didn't know or preferred not to say When asked how many owners are limited in their day-to-day activities because of a health problem or disability, which has lasted, or is expected to last, at least 12 months: ● 6 (60%) businesses stated that owners had no long term health problems or disabilities ● 4 (40%) preferred not to say When asked how many owners are from each ethnic group: ● 3 (30%) businesses stated White ● 1 (10%) businesses stated Indian ● 2 (20%) businesses stated African ● 1 (10%) business stated Chinese ● 3 (30%) businesses preferred not to say When asked of the religious affiliation of business owners: ● 1 (10%) business stated no religion ● 4 (40%) businesses stated Christian ● 1 (10%) business stated Jewish ● 1 (10%) business stated Sikh ● 3 (30%) businesses preferred not to say When asked about the sexual orientation of business owners: ● 7 (70%) businesses stated that owners identified as heterosexual/straight ● 3 (30%) businesses preferred not to say When asked about the marital status of business owners: ● 5 (50%) businesses stated owners were married ● 1 (10%) businesses stated their owner was divorced ● 1 (10%) businesses stated their owner was formerly in a civil partnership ● 3 (30%) businesses didn't know/preferred not to say When asked about the preferred language of business owners, of 8 responses: ● 6 (75%) businesses stated English ● 1 (12%) business stated Chinese ● 1 (12%) business stated BSL
Demographic of employees	When asked how many employees were currently working at the property, businesses responses outlined that: ● 4 (40%) stated more than 10 ● 2 (20%) stated 1-2 people ● 1 (10%) preferred not to say ● 2 (205) stated 5-6 ● 1 (10%) stated 7-8 When asked about how many employees were of each age, businesses accounted for the ages of 14 employees across the 4 businesses that provided a response: ● 1 (7%) employee was 16-24 years

Feedback from businesses	Summary of findings
	● 10 (71%) employees were 25 to 34 years ● 2 (14%) employees were 35 to 44 years ● 1 (7%) employee was 55 to 64 years When asked about the gender of their employees, 7 businesses accounted for the gender of 54 employees: ● 28 (52%) employees were male ● 26 (48%) employees were female When asked about whether their employees had a disability, 10 businesses responded whereby 70% of businesses stated no employees had a disability and 30% preferred not to say. When asked about how many of their employees were from each ethnic group, 10 businesses responded on behalf of 46 employees: ● 35 (76%) employees were White (English/Welsh/Scottish/Northern Irish) ● 1 (2%) employee was 'Other White ● 6 (13%) employees were of mixed/multiple ethnic background ● 2 (4%) employees were Indian ● 1 (2%) employee was African ● 1 (2%) employee was from another ethnic group When asked whether any of their employees were pregnant or had been pregnant within the last 12 months, 7 (70%) businesses stated that none of their employees had been and 3 (30%) preferred not to say. When asked about the languages spoken amongst employees, most businesses stated their employees spoke English, however: ● The survey found that, of employees accounted for (9 businesses accounted for 55 employees) the largest proportion of employees spoke English (89%), however 7% spoke Chinese and one employee's preferred language was Lithuanian whilst another was a BSL user. When asked what proportion of employees lived in Havering, or adjacent boroughs: ● 6 (60%) businesses stated 75-100% ● 2 (20%) businesses preferred not to say ● 1 (10%) business didn't know ● 1 (10%) business stated less than 50-75% When asked what proportion of employees are employed part time: ● 3 (30%) businesses stated 50-75% ● 3 (30%) businesses stated less than 25% ● 2 (20%) business stated 75-100% ● 2 (20%) businesses stated they didn't know/would prefer not to say

Source: Mott MacDonald, 2024



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Bridge Close Regeneration, Romford

Bridge Close Regeneration LLP

Statement of Community Involvement



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1.0 EXECUTIVE SUMMARY

Established in 2018 as a Joint Venture Limited Liability Partnership (LLP), Bridge Close Regeneration LLP aims to bring forward plans for the redevelopment of the site at Bridge Close (the site) in Romford, as part of a wider vision and high-profile growth agenda in the borough. Since March 2021, LB Havering has assumed full control of Bridge Close Regeneration LLP, hereafter referred to as 'the applicant'.

Cascade Communications Ltd (Cascade) were appointed in July 2018 to assist with consultation with stakeholders and the local community in relation to the detailed proposals for the site.

This Statement of Community Involvement (SCI) sets out a summary of the stakeholder engagement and community consultation undertaken by the applicant during the pre-application stage prior to the submission of this planning application.

The consultation process has reflected the applicant's commitment to transparency with the local community and stakeholders at every stage. This has enabled stakeholders and the community to engage with the proposals at the earliest possible opportunity and meet with senior members of the project team throughout the process.

The consultation process has provided an inclusive platform for discussion and debate, with over 30 hours of direct engagement with stakeholders, groups and residents.



Public consultation at the Havering Islamic Cultural Centre in May 2019

To date, the consultation for the proposed redevelopment of Bridge Close has included:

- Individual meetings with local groups and stakeholders;
- Nine rounds of public consultation events at different venues in Romford Town Centre;
- Approximately **2,073** residents and stakeholders were engaged during a four-stage consultation from September 2018 to October 2022;
- **27 hours** of community consultation events;
- **38,000** invitation letters to residential and commercial properties in the surrounding area, including over **50,000** emails to publicise the events;
- A dedicated project website;
- Over **116,224** residents viewing social media posts and **11,000** questions answered by respondents online; and
- Online and paper questionnaires to encourage responses.

As a result, the application has been informed by feedback from 506 questionnaire responses, 30 hours of public consultation carried out over six separate public consultation events, meetings with community groups, councillors and other stakeholders between 2018 and the point of submission.

The applicant has sought to directly respond to community feedback throughout the process, resulting in a number of changes being made prior to submission of this planning application.

2.0 BACKGROUND

2.1 Site background

The site is located at the junction of Waterloo Road and Oldchurch Road in Romford. The site is bordered by residential properties on Waterloo Road and Oldchurch Road.

Site: Bridge Close
Location: Romford, RM7
Applicant: Bridge Close Regeneration LLP
Proposal: A mixed-use development of 1,070 residential units, a new primary school, health hub and community centre, together with commercial uses.



The site is allocated as a key site for residential and mixed-use development in the Romford Area Action Plan (2008).

The plans seek to bring forward homes alongside commercial and community space and a new bridge to allow quick access to Romford station.

Havering Local Plan 2016 – 2031 (2021)
The Local Plan was adopted in November 2021 and provides a framework to guide new development in the Borough until 2031. The Local Plan replaces the Core Strategy and Development Control Policies (2008), Site Specific Allocation DPD (2008) and Romford Area Action Plan (2008). T





Photos of the Bridge Close and the River Rom (2019)

2.2 Relevant policy

In preparing our consultation strategy, we considered the relevant provisions of the Localism Act 2011, the National Planning Policy Framework (NPPF), the London Plan (March 2021) and LB Havering's own Statement of Community Involvement (SCI) which was adopted in 2015.

The NPPF set out the Government's planning policies for England and how these are expected to be applied. It also provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

The purpose of the planning system is to contribute to the achievement of sustainable development. The NPPF and related documents encourage organisations making development proposals to engage local communities from an early stage.
In particular, paragraphs 39 and 41 express this desire:

(39) *Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.*

(41) *T*he more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits. For their role in the planning system to be effective and positive, statutory planning consultees will need to take the same early, pro-active approach, and provide advice in a timely manner throughout the development process. This assists local planning authorities in issuing timely decisions, helping to ensure that applicants do not experience unnecessary delays and costs*.*

The London Plan 2021 is a spatial development strategy for Greater London, which sets out an integrated economic, environmental, transport and social framework for the development in the Capital from 2019 - 2041. The London Plan is legally part of each Local Planning Authorities' Development Plan and, therefore, is considered when planning decisions are taken in any part of Greater London.

The London Plan references community engagement and consultation in Chapter One *'Planning London's Future – Good Growth',* notably at 1.1.5 and under GG1 *'Building strong and inclusive communities':*

1.1.5 *Early engagement with local people leads to better planning proposals, with Neighbourhood Plans providing a particularly good opportunity for communities to shape growth in their areas. Taking advantage of the knowledge and experience of local people will help to shape London's growth, creating a thriving city that works better for all Londoners.*

GG1 Building strong and inclusive communities

Good growth is inclusive growth. To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must:

***A** encourage early and inclusive engagement with stakeholders, including local communities, in the development of proposals, policies and area-based strategies*

LB Havering's SCI refers to pre-application consultation by developers in Section 4.2:

***4.2.1** In line with the National Planning Policy Framework 2012 and National Planning Practice Guidance 2014 the Council strongly encourages prospective applicants to engage and consult with neighbours and other stakeholders who might be affected by their proposal, prior to submitting the application to the Council.*

***4.2.2** Involvement of stakeholders and the wider Havering community at the pre-application stage can help early identification of potential issues, ease the subsequent planning process and lead to an improved development.*

***4.2.4** The Council does not set prescribed standards for pre-application consultation. The applicant should be able to justify that the methods used are reasonable in relation to the scale and potential impacts of the development and that the consultation reaches those who will be affected by the proposal.*

***4.2.5** Where pre-application consultation is carried out, applicants should prepare a report summarising the type of consultation carried out, the key issues raised and how the scheme has been amended (if at all) to addresses these issues. This should be submitted as part of the planning application.*

3.0 STAKEHOLDERS AND CONSULTEES

3.1 Stakeholders

Political stakeholders

- Ward members for Romford Town, LB Havering
- Neighbouring ward members for Brooklands, Pettits, Hylands and Squirrels Heath – all LB Havering
- Senior councillors, including:
  - Leader of the Council
  - Deputy Leader of the Council
  - Cabinet Member for Housing
  - Cabinet Member for Finance and Property
  - Cabinet Member for Environment
  - Cabinet Member for Education, Children and Families
  - Cabinet Member for Health and Adult Care Services
  - Cabinet Member for Public Protection and Safety
- Members of the Strategic Planning Committee, LB Havering
- MP for Romford

Community stakeholders

- Havering Islamic Cultural Centre
- Bridge Close Business Alliance
- Havering Museum
- Havering Chamber of Commerce
- Havering Arts Council
- BHR Hospitals – Queen's Romford
- Queen's Theatre
- Onsite Youth Zones
- St Francis Hospice
- Elim Church
- St Edward the Confessor Church
- Havering Public Health
- Havering Association for People with Disabilities
- Havering Positive Future
- Brookside Theatre
- Havering MIND
- Concordia Academy
- Liberty Shopping Centre
- The Mercury Shopping Centre
- The Brewery Shopping Centre





Public consultation at the Mercury Shopping Centre in November 2018

Consultation area



This map illustrates the distribution area for community letters and correspondence regarding the proposals. This includes approximately 8,348 residential and business addresses.

Please see Appendix 1 for a larger version of the distribution area.

4.0 METHODOLOGY

Cascade's consultation methodology followed best practice within the industry and ensured the consultation was informative and that attendees were able to feed back at appropriate stages. The consultation sought to:

1. Inform residents about the emerging plans for the site and gather feedback;
2. Speak to local stakeholders and residents in advance of submitting an application to understand what the issues were likely to be and identify their concerns, thereby allowing for amendments to be made to the scheme prior to the design being finalised; and
3. Identify residents' aspiration and views on the benefits of the proposals.

Accessibility and inclusion

As part of the consultation and community engagement for the project and prior to commencing any engagement, our team conducted a comprehensive research phase including a stakeholder audit to ensure all potential stakeholders are captured including political, amenity society, third sector organisations, businesses, and community / residents' groups.

The purpose of the above activity was to ensure all stakeholders were involved in the process and could easily access the consultation process. A comprehensive stakeholder audit enabled the team to connect with as wide a range of stakeholders as possible and particularly people with protected characteristics (Equality Act 2010). This includes groups of people who are often not heard (such as young people, BAME communities or people with disabilities), people who may be missed by traditional engagement methods and people who need support in order to participate.

The consultation process and methodology included:

- **Translations**: Language and braille translations of the consultation newsletters were offered to residents and members of the public.
- **Voice recording**: A voice recording was produced and issued to community and local groups in addition to the consultation invitation.
- **Social media advertisements**: These were run in the days leading up to the consultation events, targeted at both a wide range of audiences and groups which fall under protected characteristics categories.
- **Newsletters**: Over 8,000 physical newsletters issued to households and businesses in Romford.
- **Questionnaires**: Feedback forms were provided at the in-person events and online on the website to enable residents share their thoughts on the proposals.
- **Consultation events**: Both in-person and online events were organised to give people flexibility and provide residents the opportunity to be involved in the consultation process, view the plans in details and speak directly with members of the project team.
- **Email notifications to groups and stakeholders**: Notifications were issued to identified local stakeholders and groups encouraging them to participate in the consultation process.

Stakeholder engagement

We have set out below stakeholder groups contacted to participate in the consultation and community engagement for the Bridge Close Regeneration project. As advised by the EQIA advisor, we made direct contact with groups with protected characteristics – those groups are included in the list below. Whilst we did not receive direct responses from these groups, it is anticipated that members would have visited the project website and viewed the project information.

Age – Young people

Crowlands Primary School
Hylands Primary School
St Mary's Catholic Primary School
Concordia Academy
Rush Green Primary School
Warren Junior School
Harrow Lodge Primary School
Gidea Park Primary School
Furze Infant School
Robert Clack Primary School
William Bellamy Primary School
Grafton Primary School
Squirrels Heath Primary School
St Edward's Church of England Primary School
Parklands Primary School
Towers Junior School
St Peter's Catholic Primary School
Positive Parents Havering
First Step
Wize Up

Age – Older people

Havering Over 50s Forum
Havering Alzheimers Group
Age UK East London
Beech Court Care Home
Di's Diamonds
Tapestry (Dementia)

Groups associated with gender / gender reassignment / Trans groups

Havering LGBT and Youth Forum
Havering LGBT and Forum 50+ Club

Pregnancy affiliated groups

Butterflies Support Group
Home-Start Havering

People with young children

Over The Rainbow Day Nursery
The Learning Tree Nursery
Fledgelings Day Nursery
Montessori Minds
Great Child Nursery & Pre-school
Little Robins Montessori Nursery & Pre-school
Cotton Buddies Day Nursery
Little Explorers Day Nursery
Playdays Pre-school
Phoenix Pre-school
Romford United Reformed Church Playgroup
Fledgelings Day Nursery

Groups associated with people with disability – Visually impaired

Sight Action (Havering)
Partially Sighted Society Havering
The Partially Sighted Club - Havering Branch

Groups associated with people with disability – Hearing impaired

Hard of Hearing Group

Groups associated with people with disability – Cognitive

Havering Carers Hub
Romford Autistic Group Support (RAGS)
Havering Mind
Havering Alzeimers Society

Groups associated with people with disability – Ambulant impaired

YMCA Romford

Groups associated with minority ethnic groups and language

Asian Woman's Association of Havering
Havering Islamic Cultural Centre
Havering BME Forum
Havering Asian Social and Welfare Association
Polish Community Havering

Groups associated with sexual orientation

Rainbow Boroughs Project - East Area Borough Command Unit (Barking and Dagenham, Havering and Redbridge)

Diabetes UK Havering support group
Samaritans of Havering
Havering Volunteer Centre

Wider reaching groups

Islamic Cultural Centre
The Retailery
Brookside Theatre
Liberty Shopping Centre
Havering Museum
Chamber of Commerce
The Brewery Shopping Centre
Havering Arts Council
BHR Hospitals – Queen's Romford
Queens Theatre
Bridge Close Busieness Alliance
Partnered with LB Havering
The Mercury Shopping Centre
Liberty Shopping Centre
Ellandi (Mercury Mall)
Onsite Youth Zones
Mercury Shopping Centre
MIND
St Francis Hospice
Elim Church
St Edward the Confessor Church
Business Education Partnership
WDP Havering Public Health
Havering Association for people with disabilities
Havering Positive Future
Brookside Theatre
Chamber of Commerce

4.1 Consultation overview

The following diagram sets out the community engagement included as part of the pre-application consultation, with a detailed overview of those events included later in this report.



First stage of consultation - September 2018

- 208 attendees
- 45 feedback forms received



Second stage of consultation - November 2018

- 300 attendees
- 50 feedback forms received



Third stage of consultation - May 2019

- 391 attendees
- 379 feedback forms received



Fourth stage of consultation - September 2019

- 746 attendees
- 32 feedback forms received



Fifth stage of consultation - October 2022

- 427 attendees
- 21 feedback forms received

First public consultation – September 2018

The first public consultation on the emerging proposals was held on Saturday 29th September 2018, from 10am to 4pm at the Brewery Shopping Centre, Romford. The exhibition set out a broad vision for the site and provided an opportunity for residents to contribute their views and ideas. Approximately 208 residents and stakeholders attended on the day, and general feedback from the exhibition was positive, and detailed in Section 4.2 of this report.

Attendees included representatives of the following groups:

- Bridge Close Business Alliance
- Havering Islamic Cultural Centre

Key themes of discussion at the event and community feedback included:

- Support for school and healthcare facility
- Support for the regeneration of the site
- Support for improved permeability of the site and opportunity to open the river frontage
- Support for the delivery of new homes in Romford
- Queries around the future of the Havering Islamic Cultural Centre and desire for a prayer and community centre to be provided
- Concerns around parking and increased traffic
- Concerns regarding the loss of business space and from current residents currently
- Concerns over the potential density/overdevelopment of the site

An invitation newsletter was sent to all households and businesses in Romford Town ward, approximately 8,000 properties. The invitation also included the website where the exhibition boards are easily accessible. The space in the shopping centre worked well, with a good amount of footfall.

Information boards (see Appendix 2) were displayed inside the atrium, between Sainsbury's and Nuffield Gym. This location was next to the entrance and exit to the shopping centre, providing good footfall and the opportunity to have brief chats with residents passing through who may not have gone out of their way to attend.

Copies of the questionnaire and Freepost envelopes were available. Key members of the development team were on hand to answer any questions and brief attendees on the initial proposals and overall vision of the project. A flyer advertising the details of event and contact details for the was distributed on the day of the consultation (see Appendix 3).



First public consultation at the Brewery Shopping Centre in September 2018

Consultation questionnaire – September 2018

The consultation questionnaire (see Appendix 4) was designed to gain initial feedback from neighbours. Guided by conversations with the project team, attendees were asked to fill out the form and provide feedback on three key areas:

1. What works well and what could be improved in Romford town centre?
2. Aspirations for what could be delivered on the site. For example, new jobs, connections, cafes and restaurants, cultural facilities, community facilities (e.g. health and education)
3. The principle of redeveloping the site

Attendees were encouraged to complete the questionnaire on the day, however Freepost envelopes were also provided for residents to return the questionnaire by post. An electronic version of the questionnaire was also available on the website from Monday 1st October 2018.

A total of 45 feedback forms were received during the first stage of consultation. A summary of the feedback received via the questionnaire can be found in Section 4.2 of this report.

Second public consultation – November 2018

A second public consultation was held in November 2018 to display the updated proposals and how they had evolved in response to consultation.

The consultation took place on:

- Saturday 17th November from 10am to 4pm at the Mercury Shopping Centre
- Tuesday 20th November from 4pm to 7pm, at the Elim Christian Centre

Around 300 residents attended the public consultation events, including representatives from the following groups:

- Bridge Close Business Alliance
- Havering Islamic Cultural Centre
- Elim Christian Centre
- Romway Action Group
- Romford Business Improvement District

An invitation newsletter was sent to approximately 8,000 residential and commercial properties in the surrounding area. The invitation included website details where the exhibition boards are easily accessible.

Following the initial round of consultation in September 2018, residents and businesses had a further opportunity to share their views on plans to transform Bridge Close. The second public exhibition showed how the plans are responding to local aspirations and ambitions, as well as the feedback raised so far.

General feedback from the exhibition was positive with 74% supporting the emerging plans for the site.

Key themes of discussion at the event and community feedback included:

- Support for school and healthcare facility
- Support for the regeneration of the site, including comments related to the current appearance
- Support for improved permeability of the site and opportunity to open the River Rom frontage
- Support for the delivery of new homes in Romford
- Questions around parking and increased traffic
- Questions regarding the potential loss of business space and residential properties
- Comments regarding the potential density/overdevelopment of the site and the over development of wider Romford

The space in the shopping centre worked well, with a significant amount of footfall and the church hall allowed closer neighbours to attend. Nine pull-up banners were used to introduce the team, the site, the emerging masterplan and the next steps.

Information on the developing proposals for the redevelopment of the site was displayed on boards (see Appendix 5).

In order to maximise footfall and attendance, the event was clearly signposted using A-frames and directional signs. A flyer was available for people to take away (see Appendix 6) and 250 were handed out across the two days.

Copies of the questionnaire and Freepost envelopes were also available. Key members of the development team were on hand to answer any questions and brief attendees on the proposals.



Public consultation at the Elim Christian Centre in November 2018

Consultation questionnaire – November 2018

The second consultation questionnaire (see Appendix 7) was constructed to gather feedback and give the project team an understanding of respondents' views on the developing proposals for the site. The questionnaire included open-ended questions so that respondents did not feel restricted when providing their feedback.

Freepost envelopes were provided for residents to return the questionnaire by post. An electronic version of the questionnaire was also available on the Bridge Close website. A summary of the feedback received via the questionnaire can be found in Section 4.2 of this report.

275 residents attended on the first day and 25 attended on the second day. Overall, 50 feedback forms were received.

Third public consultation – May 2019

A third public consultation was held in May 2019 to display the updated proposals and how they had evolved in response to consultation.

The consultation took place on:

- Saturday 11th May from 10am to 4pm at the Brewery Shopping Centre
- Tuesday 14th May from 4pm to 7pm at the Havering Islamic Cultural Centre

151 residents attended on the first day and 240 attended on the second day, including representatives from the following groups:

- Bridge Close Business Alliance
- Havering Islamic Cultural Centre
- Teacher from a local school
- Havering Chamber of Commerce
- Time South Street Baby & Toddler Group
- Romford Labour Group
- Hornchurch Residents Association
- Romford Scouts
- Havering Community Learning Association
- Wellgate Community Farm
- Elim Christian Centre

An invitation newsletter was sent to approximately 8,000 residential and commercial properties in the surrounding area. The invitation included website details where the exhibition boards are easily accessible.

Following two previous rounds of consultation, Romford residents were invited to view the plans for the regeneration of Bridge Close Industrial Estate. This provided an opportunity to share the current plans and demonstrate how they have developed based on local aspirations and feedback received at the previous consultation events.

Key themes of discussion at the event and community feedback included:

- Significant support for the provision of a new community centre
- Support for school and healthcare facility
- Support for the regeneration of the site
- Support for improved permeability of the site and opportunity to open the River Rom frontage
- Support for the delivery of new homes in Romford
- Questions around parking and a potential increase in traffic
- Questions regarding the loss of business space and from current residents currently

- Comments regarding the potential density/overdevelopment of the site and the development of the wider area
- Questions surrounding sustainability and considerations for the environment

The locations for the exhibitions worked well, particularly at the Havering Cultural Islamic Centre as it is located on the Bridge Close site, therefore enabling us to directly engage with a key group of stakeholders. There were ten pull up banners on display (see Appendix 8), detailing the progression of the plans. An information flyer was also available for attendees.

A flyer was also available for attendees to take away (see Appendix 9).



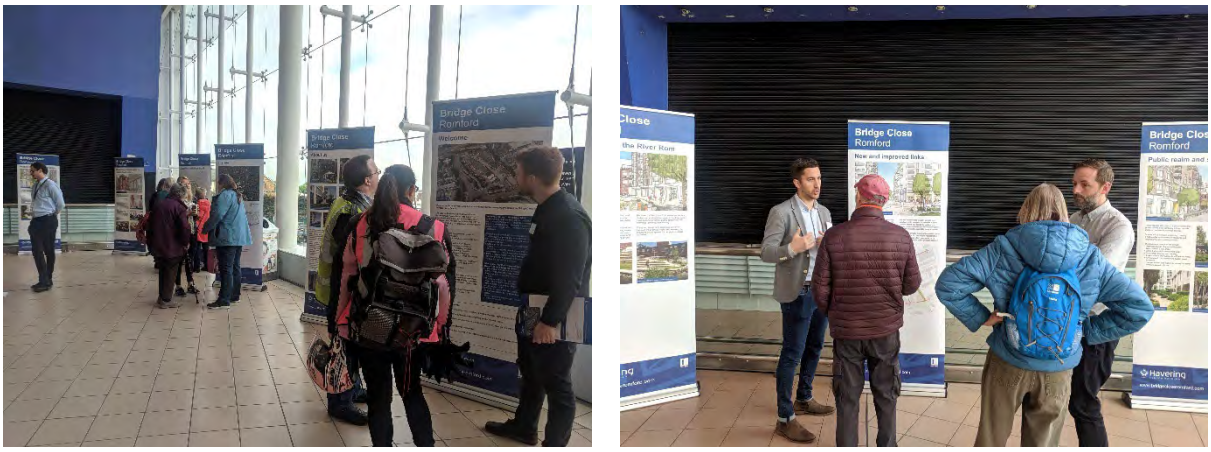
Public consultation at the Havering Islamic Cultural Centre in May 2019

Consultation questionnaire – May 2019

The third consultation questionnaire (see Appendix 10) was constructed to gather feedback and give the project team an understanding of respondents' views on the developing proposals for the site. The questionnaire included open ended questions about specific improvements that could be made to moving forward. It was additionally useful to make comparisons and identify how aspirations of residents who live on the site differ to residents who do not.

The project team was joined on the day by Built-ID, who encouraged residents to submit feedback via their online platform and interactive tablet.

Written feedback forms were also handed out to attendees, along with Freepost envelopes which were provided for attendees who wished to complete the forms at home and return them. A total of 300 feedback forms were completed or taken away over the two dates.



Public consultation at the Brewery Shopping Centre in May 2019

Fourth public consultation – September 2019

A fourth public consultation was held in September to display the updated proposals and how they had developed over the course of three previous stages of consultation.

The consultation took place on:

- Saturday 14th September 2019 from 10am to 4pm at the Brewery Shopping Centre

746 residents either interacted with the project team or looked at the exhibition boards. Attendees included representatives from the following groups:

- Bridge Close Business Alliance
- Havering Islamic Cultural Centre
- Elim Christian Centre
- Local business owners

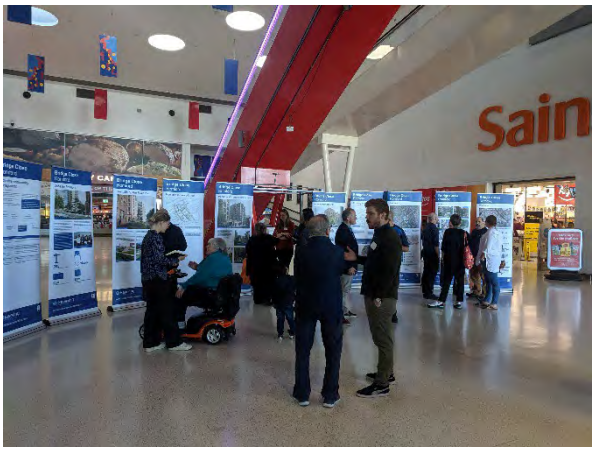
An invitation newsletter was sent to approximately 8,000 residential and commercial properties in the surrounding area. The invitation included website details where the exhibition boards are easily accessible.

Following three previous rounds of consultation, Romford residents were invited to view the plans for the regeneration of Bridge Close Industrial Estate. This provided an opportunity to share the current plans and demonstrate how they have developed based on local aspirations and feedback received at the previous consultation events.

Key themes of discussion at the event and community feedback included:

- Support for the regeneration of the site
- Support for the provision of new schools and health facilities in Romford
- Support for the delivery of new homes in Romford
- A few questions asking whether the new homes were available for sale
- Questions regarding the loss of business space
- Questions surrounding parking and transport around the site

The space in the shopping centre worked well, owing to the significant amount of footfall, and generated significant engagement. There were ten pull up banners on display (see Appendix 11), detailing the progression of the plans.





Public consultation at the Brewery Shopping Centre in September 2019

Consultation questionnaire – September 2019

The fourth consultation questionnaire (see Appendix 12) was constructed to gather feedback and give the project team an understanding of respondents' views on the developing proposals for the site. The questionnaire included open-ended questions so that respondents did not feel restricted when providing their feedback.

Freepost envelopes were provided for residents to return the questionnaire by post. An electronic version of the questionnaire was also available on the Bridge Close website. A summary of the feedback received via the questionnaire can be found in Section 4.2 of this report.

Fifth public consultation – October 2022

A fifth public consultation was held in October 2022 to provide an update on the proposals ahead of a planning application submission.

The consultation took place on:

- Wednesday 26 October 2022 from 11am to 2pm at the Brewery Shopping Centre
- Thursday 27 October 2022 from 6pm to 7pm (Online webinar)
- Saturday 29 October 2022 from 12pm to 3pm at the Brewery Shopping Centre

427 residents either interacted with the project team or looked at the exhibition boards. Attendees included representatives from the following groups:

- Havering Islamic Cultural Centre
- Local business owners
- Councillors
- Neighbours and visitors to the Brewery Shopping Centre

An invitation newsletter was sent to approximately 8,000 residential and commercial properties in the surrounding area. The invitation included website details where the exhibition boards are easily accessible.

Following an extensive and wide-ranging process of public consultation over the last four years, residents were invited to view the plans for the regeneration of Bridge Close Industrial Estate ahead of the planning application submission.

Key themes of discussion at the event and community feedback included:

- Support for the regeneration of the site.
- Support for the provision of new schools and health facilities in Romford.
- Positive comments about the look and feel of the architecture and place.
- Questions relating to timescales and availability of the new homes.
- Questions about the re-provision of HICC and a lack of clarity on the plans for the centre.
- Support for the delivery of new homes in Romford.
- Support for improved permeability of the site and opening the River Rom frontage.
- Support for the creation of new jobs.
- Questions relating to the phasing of the development and overall development programme

As with previous consultation events held in the Brewery Shopping Centre, the space in the shopping centre encouraged a significant amount of footfall and generated significant engagement. There were eleven pull up banners on display (see Appendix 13), detailing the progression of the plans.

Consultation questionnaire – October 2022

The fifth consultation questionnaire (see Appendix 14) was constructed to gather feedback and give the project team an understanding of respondents' views on the proposals for the site. The questionnaire included open-ended questions so that respondents did not feel restricted when providing their feedback.

Freepost envelopes were provided for residents to return the questionnaire by post. An electronic version of the questionnaire was also available on the Bridge Close website. A summary of the feedback received via the questionnaire can be found in Section 4.2 of this report.

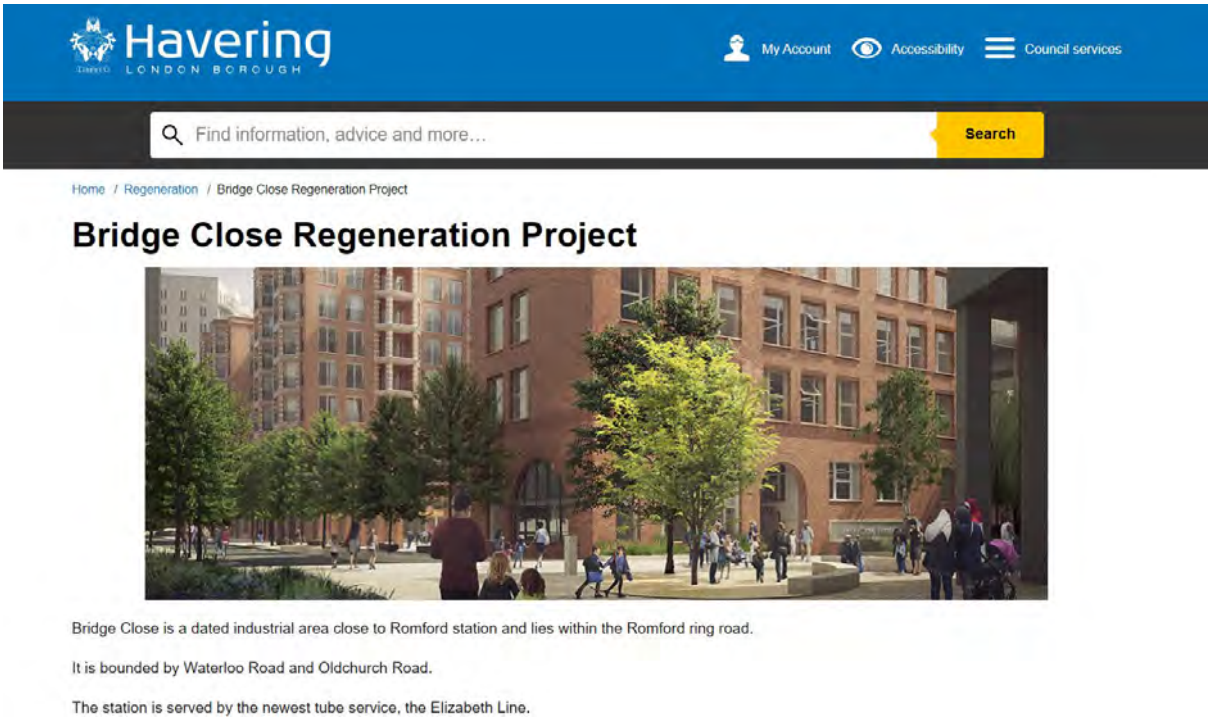
Bridge Close website

A dedicated project website was created and contained background information on the proposals, the public consultation events and an option for visitors to view copies of the exhibition panels. The website also included the contact details for residents to contact the project team and sign-up form for visitors to subscribe to updates.

The website was listed on all materials throughout the consultation, including the consultation boards, feedback forms, invitations and flyers.

Throughout the four stages of consultation, the website was updated to include all information displayed at the events to provide residents with a further opportunity to view the information panels, as well as to provide their feedback via an online version of the questionnaire.

The website will continue to be updated as the planning application progresses.



Screenshot of the homepage for the Bridge Close website https://www.havering.gov.uk/bridgeclose

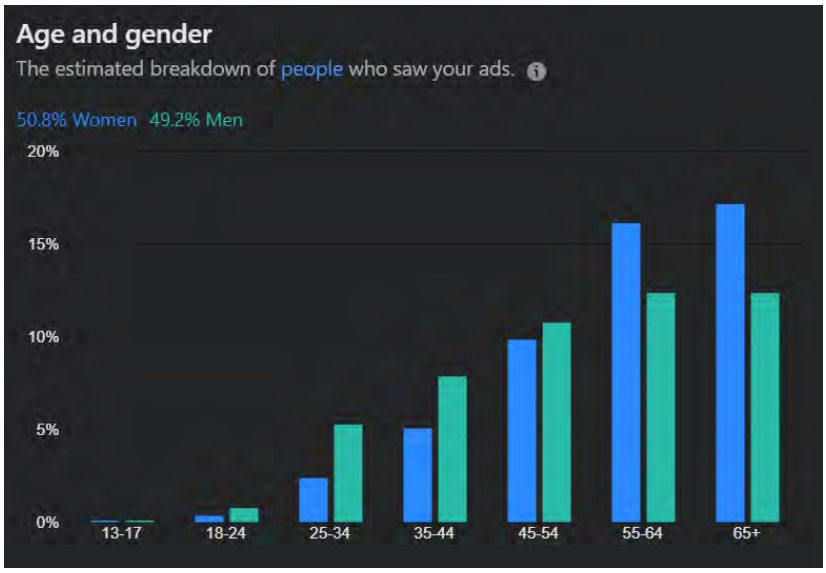
Social media

To encourage wider participation in the consultation events, social media adverts were run on Facebook and Instagram in the week leading up to the consultation events. The purpose of the adverts were to encourage participation in the upcoming consultation events, by directing residents to the consultation website to register for and attend the events.

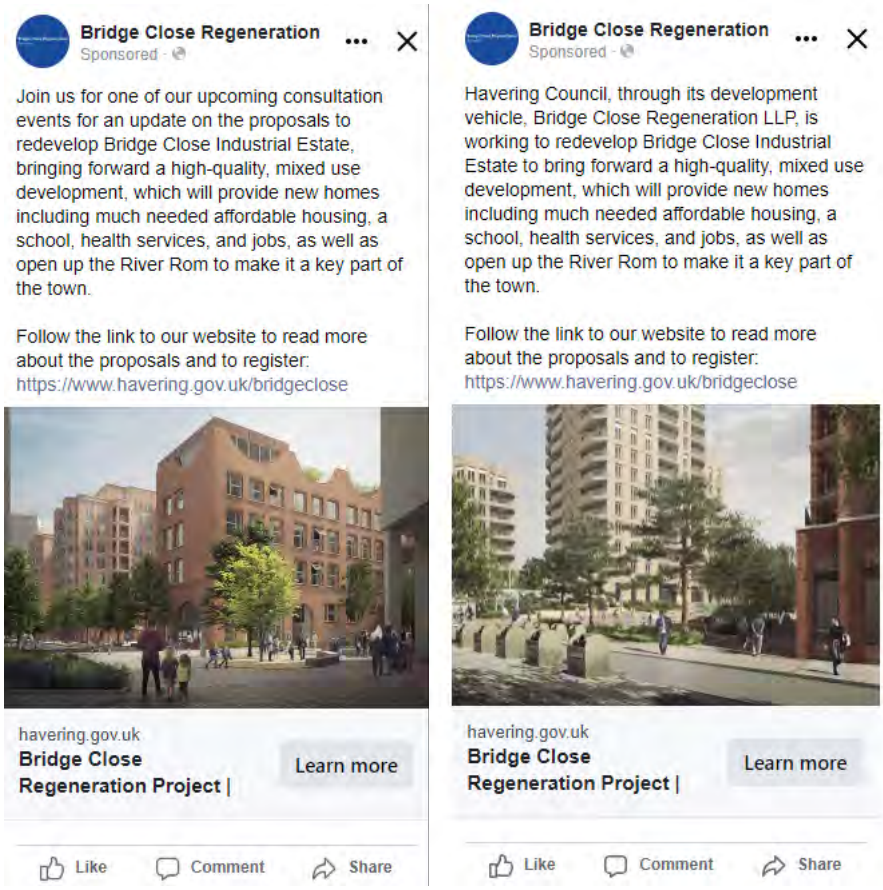
Headline statistics include:

- 20,224 people reached via the social media adverts.
- 1,322 actions in relation to adverts including likes, shares and more

- Out of people reached, 50.8% were women and 49.2% were men.



Estimated breakdown of people who saw the adverts



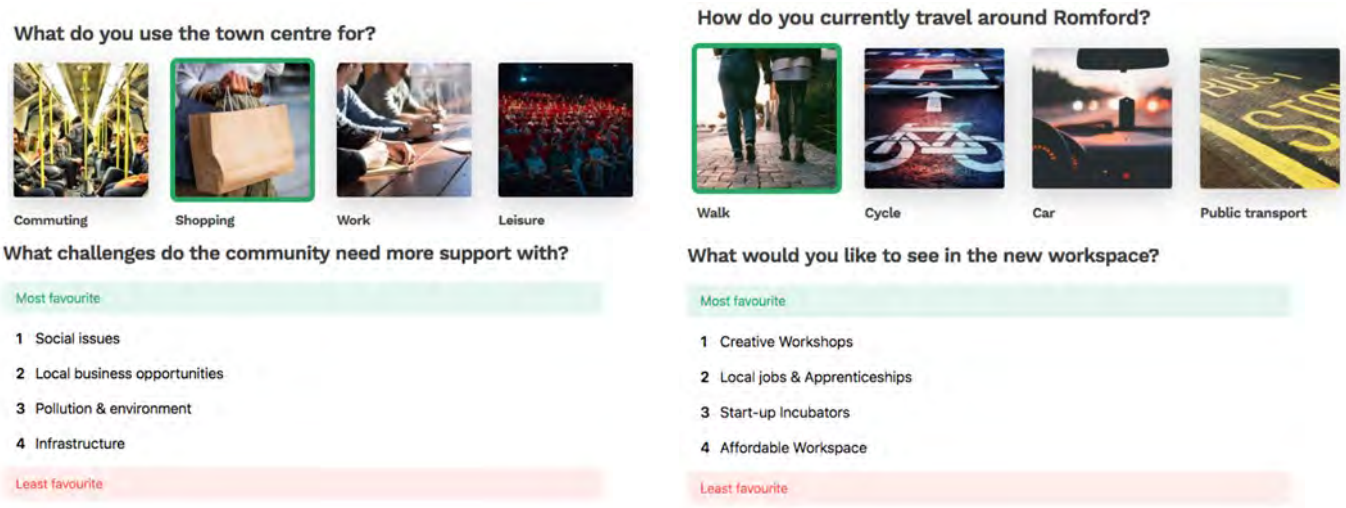
Examples of the social media adverts

Built ID: Give My View

The applicant appointed Built ID, a digital engagement company, to develop an app, Give-My-View, which digitises community engagement and makes it far easier, and quicker, for time-poor workers, parents or those who find it difficult to attend public meetings or respond in writing to provide their views on development plans.

The Give My View app was used as part of the consultation process for the third phase of public consultation for Bridge Close. The app provided residents with the opportunity to provide their feedback via a series of quizzes designed to enable communities to influence projects in their neighbourhood, with votes having a demonstrable impact on proposals. A copy of the Built ID report can be viewed at Appendix 15.

Thanks to the Give-My-View online consultation, three local charities will be benefitting from a donation. MIND, Rainbow Children's Charity and Lennox Children with Cancer will be sharing a donation of £2,500. The donation was an incentive for local people to provide their views and the charities were chosen from the official LB Havering Mayoral Charities (at the time of consultation).



Screenshots of some of the Give My View survey questions



96,746
residents viewed social media posts



11,000
questions answered by voters online

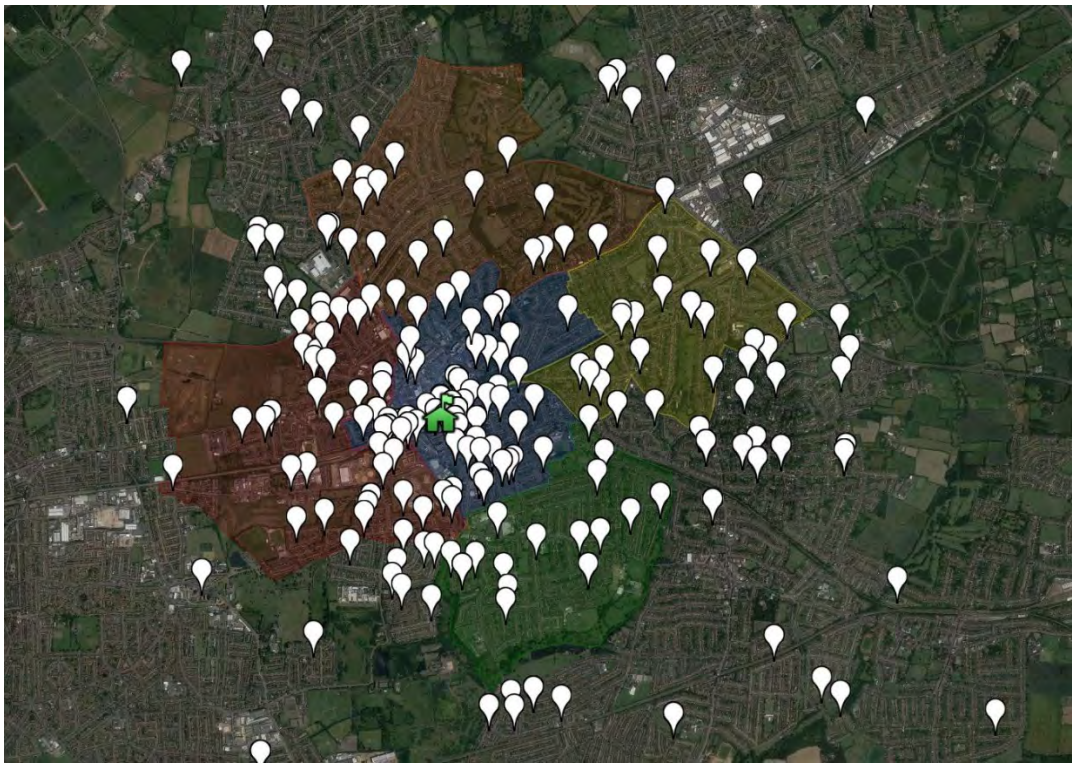
4.2 FEEDBACK

Community feedback on the proposals for Bridge Close have been largely supportive. A breakdown of the feedback received over the four stages of public consultation is detailed in this section of the report. The main areas of interest and discussion with the local community and stakeholders to date are included in Section 5.

Questionnaires was used to enable respondents to share their views and record their comments. To date, 527 feedback forms have been received.

Map of respondents:

Below are maps showing the approximate location of the respondents who filled in feedback forms during the exhibition or via Freepost. Majority of the feedback received was from Romford Town ward (where Bridge Close is located) and neighbouring wards of Brooklands, Pettits, Hylands and Squirrels Heath. The green icon is the Bridge Close site.



Map showing consultation respondents who provided their postcode – Note duplicates are grouped

Key: Romford Town – Blue / Brooklands – Red / Pettits – Orange / Hylands – Green / Squirrels Heath - Yellow

4.3 Consultation questionnaire feedback

Summary

Approximately **2,073** residents and stakeholders were engaged at nine events across five stages of public consultation from September 2018 to October 2022. To date, we have received **527 completed questionnaires** either at the events, via freepost responses or on the project website. Additionally, during the third stage of consultation, we conducted online questionnaires and polls to engage with residents who did not attend the public consultation events.

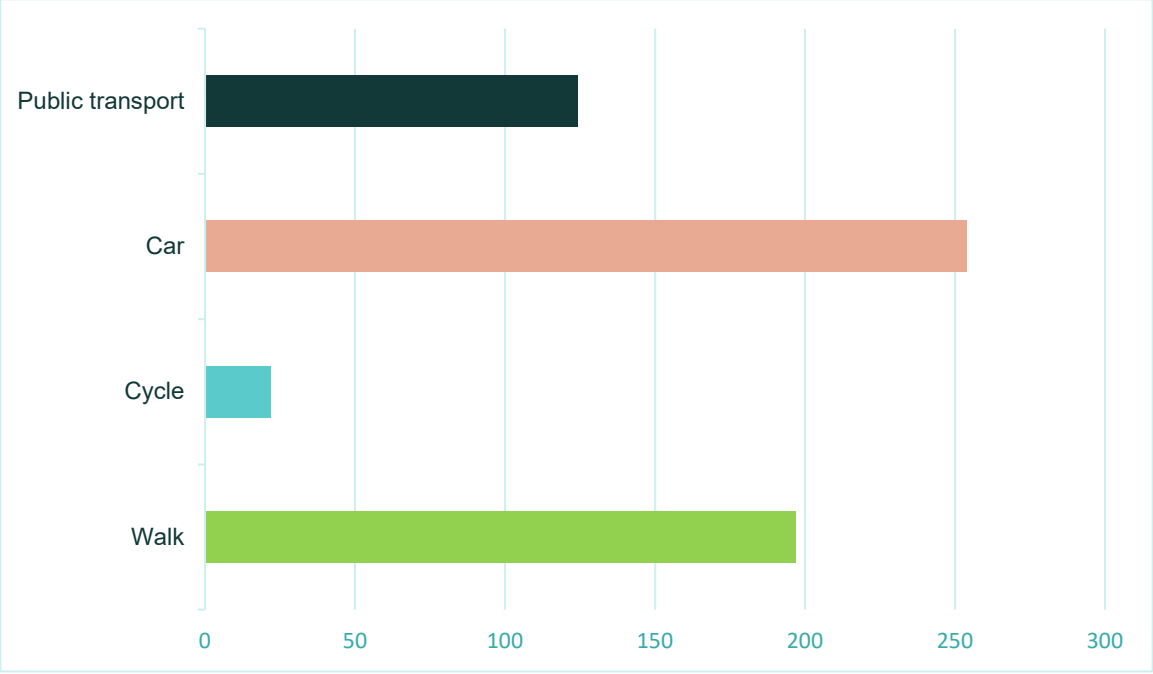
A full summary of the feedback is included below.

Breakdown of responses – September 2018 to September 2019

***The following feedback is based on 506 feedback forms between September 2018 to September 2019, received at the various public exhibitions, online or via freepost*.**

How do you travel around the local area?
(Answered 373)

- Walk: 53% (197)
- Cycle: 6% (22)
- Car: 68% (254)
- Public transport: 34% (124)

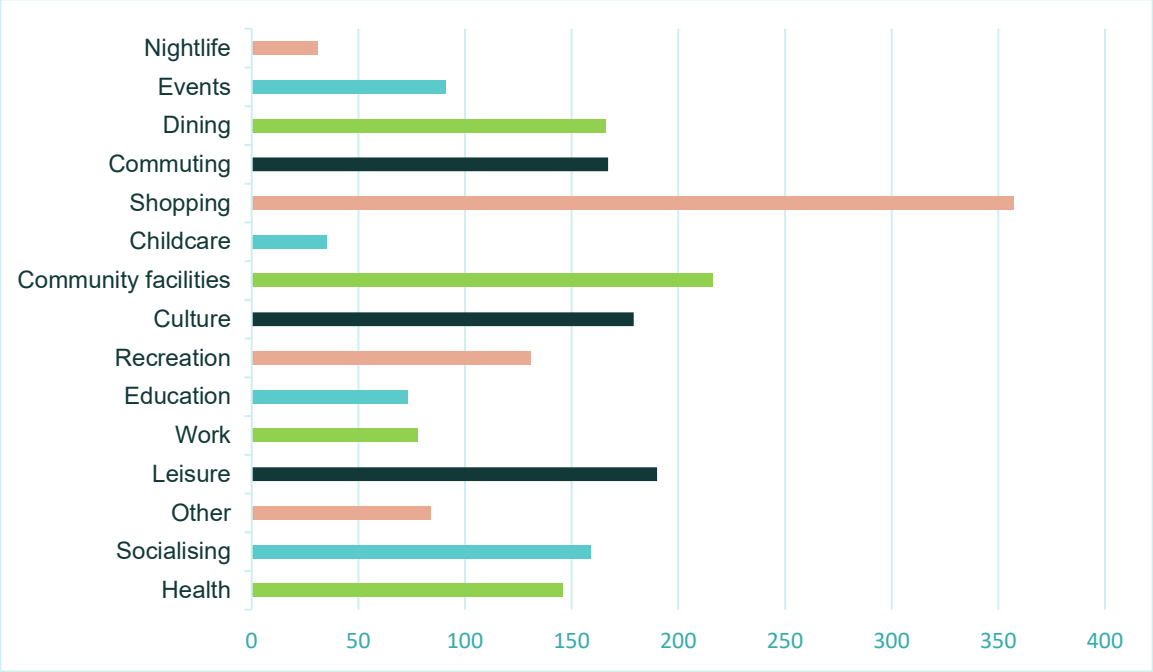


What do you use the town centre for?
(Answered 424) *Respondents were asked to tick as many options as they liked. *

Commuting: 39% (167)
Shopping: 84% (357)
Childcare: 8% (35)
Community facilities: 51% (216)
Culture: 42% (179)
Recreation: 31% (131)
Education: 17% (73)

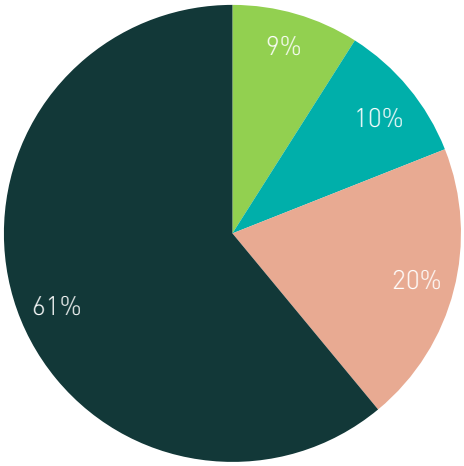
Work: 18% (78)
Leisure: 45% (190)
Pubs/ Nightlife: 7% (31)
Events: 21% (91)
Dining: 39% (166)
Health: 34% (146)
Socialising: 38% (159)
Other, please specify: 20% (84)

- Mosque
- Sports
- Library
- Bank
- Gym



Having viewed the initial proposals, do you support the emerging plans for Bridge Close?
(Answered 484)

- Yes: 61% (297)
- No: 20% (96)
- Neutral: 10% (47)
- Undecided: 9% (44)



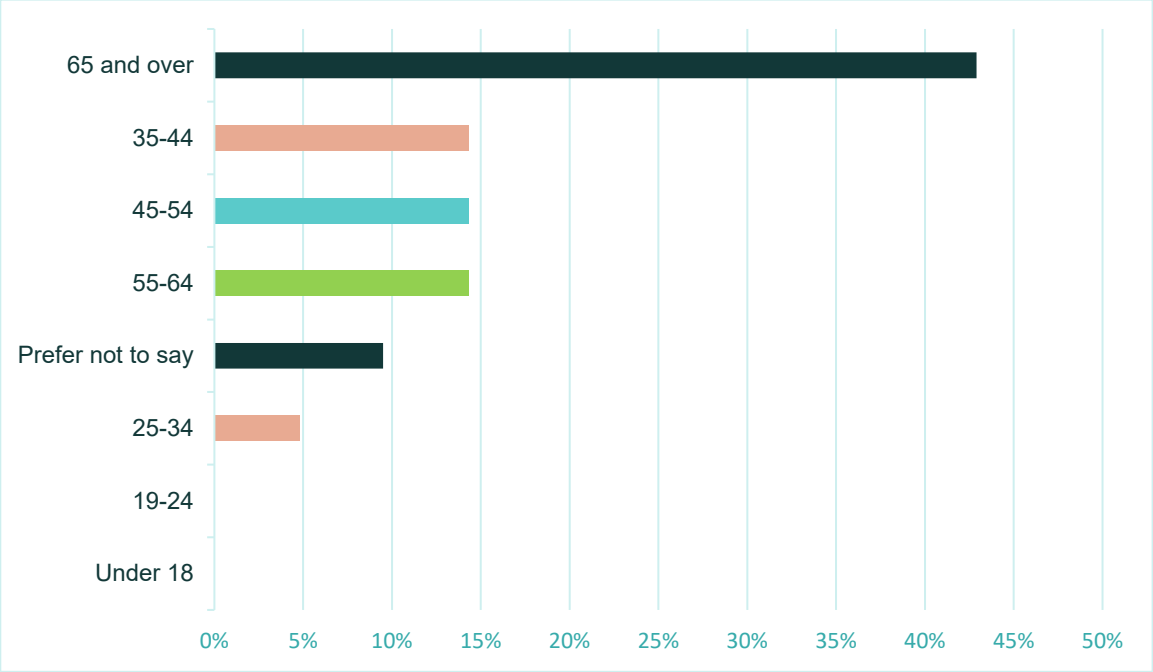
Please indicate your level of support for the following aspects of the proposals.
(Answered 418)

	Strongly support	Support	Neutral	Oppose	Strongly oppose
A new primary school	35% (146)	27% (113)	25% (105)	3% (13)	7% (27)
New homes for Romford, including a range of affordable homes	28% (118)	25% (106)	25% (104)	5% (20)	8% (34)
Healthcare centre	46% (192)	27% (112)	14% (58)	2% (10)	6% (21)
Community centre	63% (264)	13% (53)	8% (33)	1% (5)	3% (13)
Opening up the River Rom as a new public space	33% (136)	25% (105)	23% (96)	3% (12)	7% (28)
A new east-west link to provide quicker access to Romford town center	37% (156)	25% (105)	20% (83)	3% (12)	5% (21)
A range of commercial spaces including affordable workspace and cafes	26% (107)	26% (107)	25% (105)	5% (22)	7% (30)

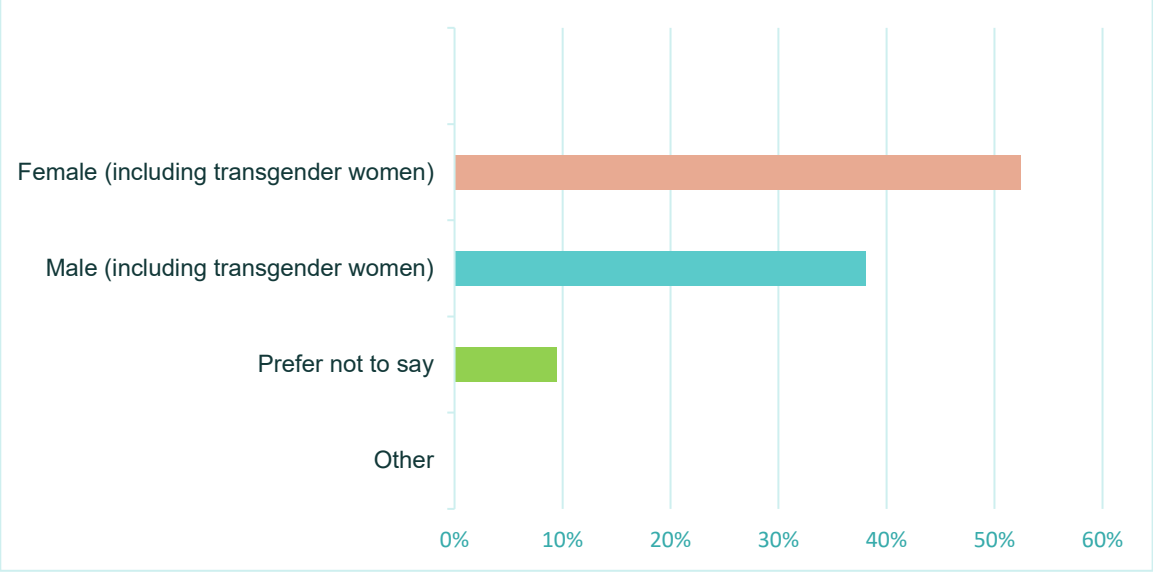
Breakdown of responses – October 2022 to November 2022

The following feedback is based on 21 feedback forms received between October 2022 and November 2022, received at the various public exhibitions, online or via freepost.

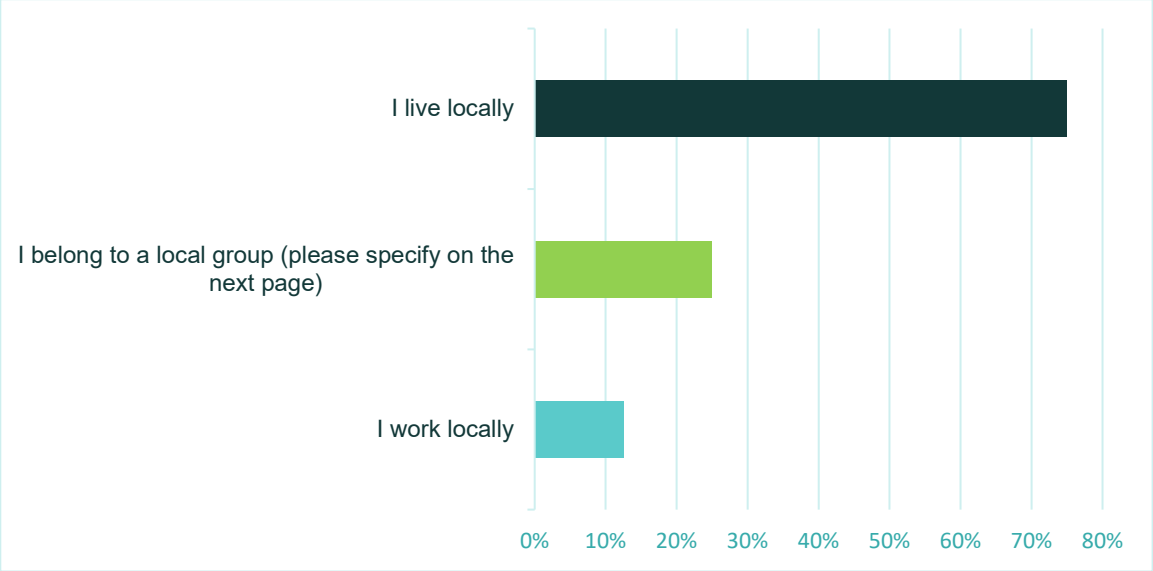
Which age group do you fall within?
(*Answered 21*)



How would you describe your gender?
(*Answered 21*)



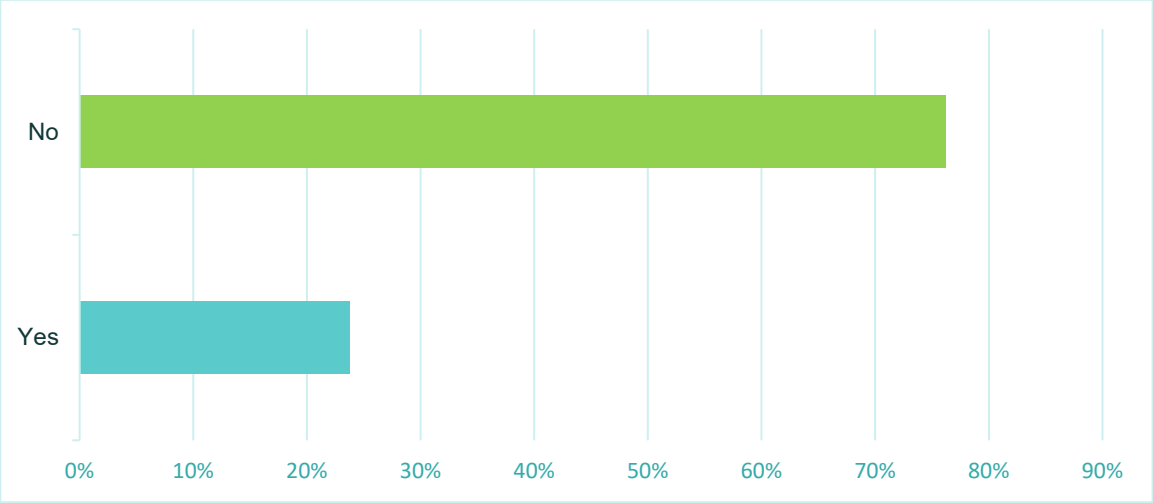
Please tick all that apply to you? [Respondents could select more than one option]
(*Answered 8*)



If you belong to a local group or groups, please let us know which one

- HICC
- Havering Islamic Cultural Centre
- Romford Civic Society
- R. C. Church
- V3A

Did you attend any of our previous public events at The Brewery or the Havering Islamic Cultural Centre?



5.0 RESPONSE TO FEEDBACK

Community facilities
The feedback from our consultation events showed that 75% of those who responded would like to see community facilities as part of the proposals. A new healthcare centre, primary school and community centre are being provided within the submitted plans. The HICC will have opportunity to take space within the new community facility if it is their preference to do so. BCR LLP is also actively assisting the HICC in finding alternative premises off-site to provide the existing facility with options and flexibility in continuing operations within Romford.

During the October 2022 consultation, a key point of discussion were concerns from HICC members as to a lack of reference on the materials and a lack of clarity on how their existing facility will be re-provided. The Applicant's representatives assured HICC members that discussions are ongoing and planning for a space for HICC was a key element of the proposals.

New links
66% of respondents support new links within the town centre. The new east-west link, across the River Rom through to Waterloo Road, will provide quicker and safer access to Romford Station and the town centre.

The site currently suffers from poor accessibility as it is constrained by the ring road, railway line and river. The proposals for Bridge Close will create new links and a gateway into the town centre. Opening-up new links across the site will enable easier access from the south and west of the site, particularly to Romford Train Station and Town Centre.

River Rom
The current bridge over the river is underused and feels unsafe to many residents. 60% of respondents through our consultation are in favour of revitalising the River Rom.

Acknowledging the important of River Rom, the proposals will provide a new pedestrian and cycle bridge over the River Rom, transforming the area into an open, attractive and active public space.

Parking and transport
Concerns were expressed about issues relating to parking or traffic in the town centre, with respondents expressing a desire for increased accessibility to the town centre and public transport.

In response to the feedback, the proposals will include:

- Car-lite development
- Dedicated disabled parking spaces in an accessible location close to the new health centre.
- Increased accessibility to town centre and train station to limit need for vehicles.
- Traffic management measures.

- Implementation of a Travel Plan which will promote alternatives to the car use for both residential and commercial occupiers.
- Increased use of alternate forms of travel. E.g. Provision of safe and accessible cycle racks or lockers and cycle paths.
- Provision of car club spaces to promote the sustainable use of motor vehicles.
- School Street

6.0 CONCLUSION

The consultation process has involved over **2,073** stakeholders, residents and members of local groups. In terms of approach, the applicant has carried out a thorough consultation over since 2018 in order to ensure that the local community has been engaged in the development of the proposals during the pre-application stage. The most recent consultation sessions with the local community and stakeholders took place in October 2022.

The views of residents have been taken into account to ensure that the proposals respond to the surroundings and town centre location. The proposals are considered, high-quality design and will create attractive new public realm and connections that will benefit the community.

The principal concerns have been carefully considered and through responses have been given to each of the issues raised within the submitted planning application documentation, principally the Design and Access Statement, the Planning Statement and the Transport Assessment.

Further consultation will be undertaken prior to the submission of any detailed, reserved matters applications.

7.0 APPENDIX

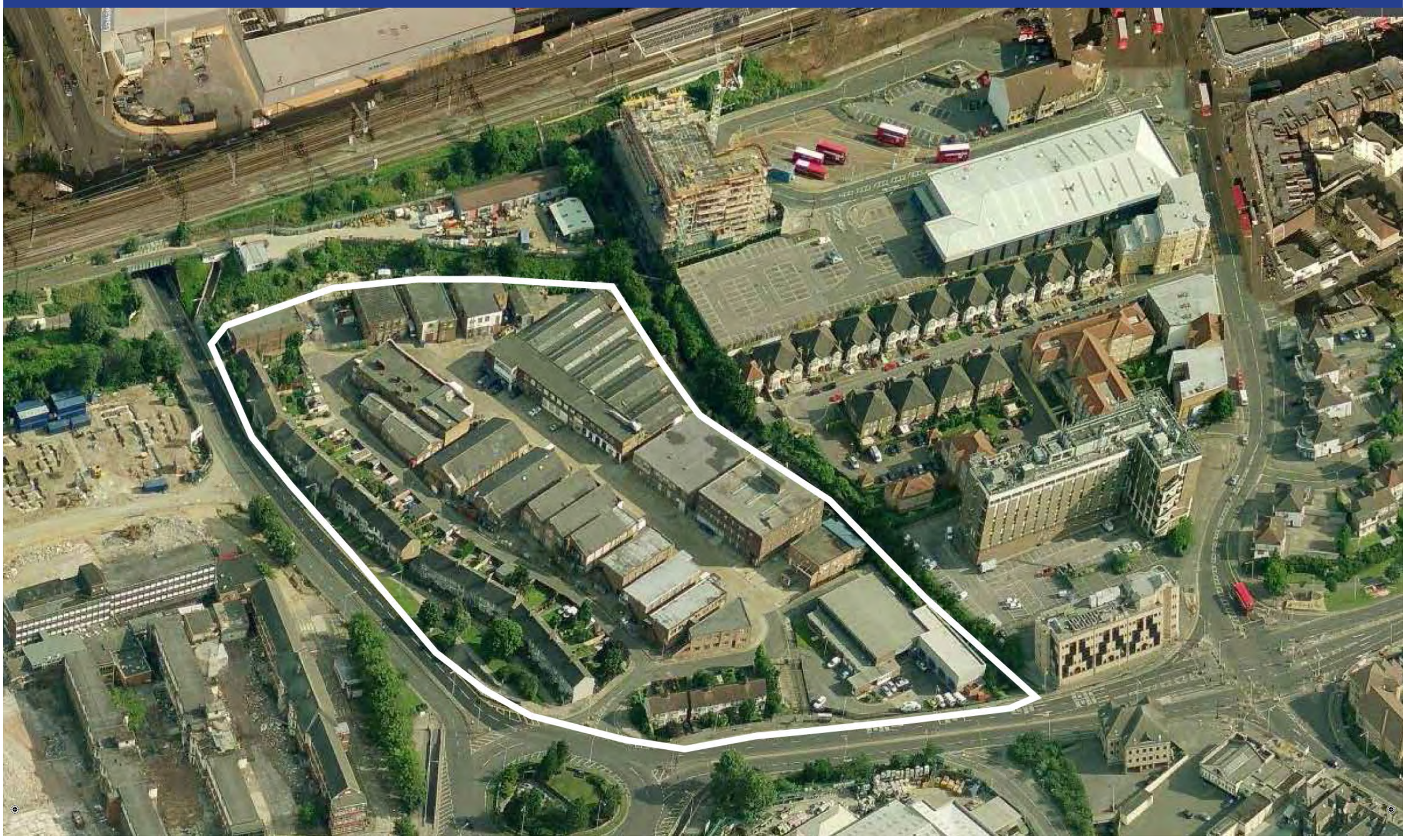
Appendix 1 - Consultation area
Appendix 2 - Exhibition boards from the first consultation
Appendix 3 - Flyer from the first consultation
Appendix 4 - Feedback form from the first consultation
Appendix 5 - Exhibition boards from the second consultation
Appendix 6 - Flyer from the second consultation
Appendix 7 - Feedback form from the second consultation
Appendix 8 - Exhibition boards from the third consultation
Appendix 9 - Flyer from the third consultation
Appendix 10 - Feedback form from the third consultation
Appendix 11 - Exhibition boards from the fourth consultation
Appendix 12 - Feedback form from the fourth consultation
Appendix 13 - Exhibition boards from the fifth consultation
Appendix 14 – Feedback form from the fifth consultation
Appendix 15 - Built ID report

Appendix 1



Distribution area for community letters and correspondence regarding the proposals, comprising approximately 8,348 residential and business addresses

Bridge Close, Romford



Welcome

Thank you for taking the time to come and discuss plans for Bridge Close, Romford.

Please feel free to browse the information in your own time, ask the team any questions and share your ideas.

We would appreciate it if you would complete a feedback form to share your views.

We are committed to working with local communities; listening and responding as we begin to shape our plans.

We look forward to working closely with you over the coming months.

www.bridgecloseromford.com

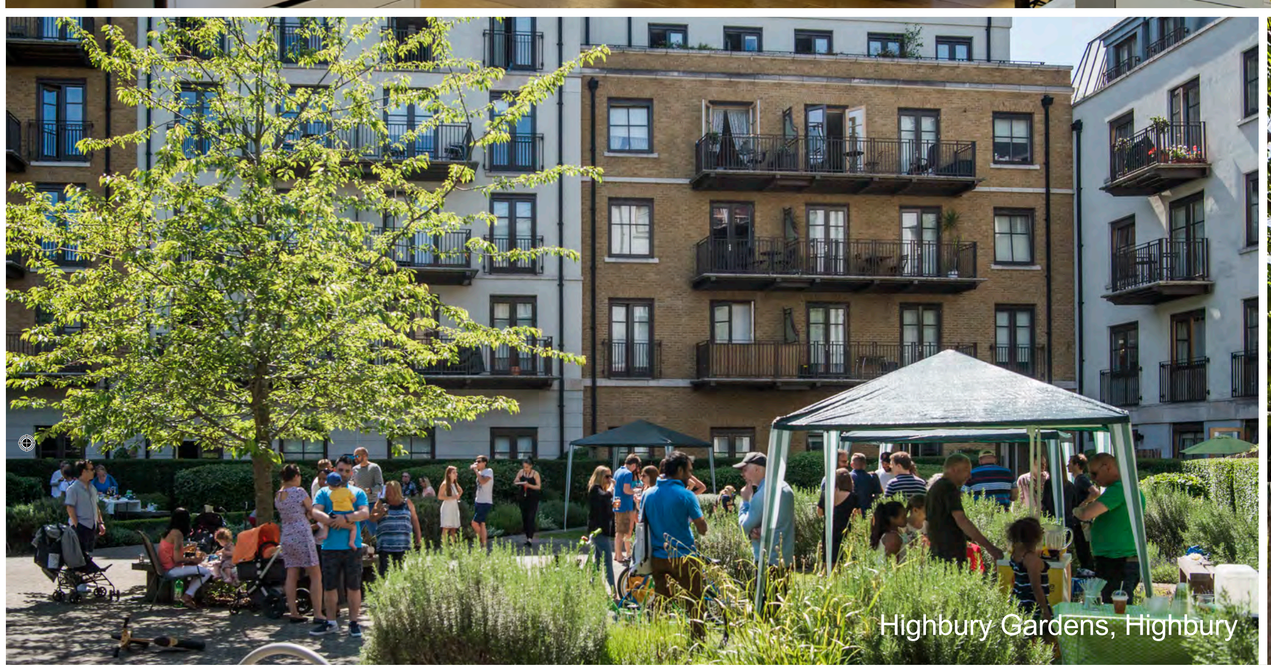
Havering LONDON BOROUGH

FIRST BASE

Bridge Close, Romford



Adelaide Wharf, Haggerston


Highbury Gardens, Highbury


East Village, Olympic Park, Stratford

About Us

London Borough of Havering has entered into a joint venture with First Base and Savills Investment Management to regenerate Bridge Close.

The joint venture has appointed award winning architects Fletcher Priest as the masterplanners, in addition to Maccreanor Lavington and Allies & Morrison, who will be designing the buildings and spaces for the first phase of the proposed development.

Together, we are committed to ensuring the delivery of a comprehensive development which brings much needed infrastructure and significant benefits for the whole of Romford.

Above are examples of projects that First Base has delivered.

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LONDON BOROUGH

FIRST BASE

Bridge Close, Romford



About Bridge Close

The Bridge Close Industrial Estate is located at the junction of Waterloo Road and Oldchurch Road in Romford.

The industrial estate is bordered by some residential properties on Waterloo Road and Oldchurch Road.

The River Rom runs through the industrial estate however it is hidden, unusable and is prone to fly tipping.

As part of the wider regeneration ambitions for Romford, the Council agreed that the industrial estate at Bridge Close, and some of the adjoining residential properties fronting onto Waterloo Road and Oldchurch Road, would be redeveloped.

The joint venture between London Borough of Havering, First Base & Savills Investment Management will be progressing plans to redevelop the area with homes, workspace, jobs and local services.

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FIRST BASE

Bridge Close, Romford



Artist's Impression

The Opportunity

Bridge Close has the opportunity to deliver more than just homes in Romford. We are already exploring the following and welcome your feedback.

- A new primary school
- Workspaces for local businesses
- Health facilities
- High quality public spaces
- Jobs for local residents
- Access to the River Rom for local people to enjoy
- A new East-West Link providing quick, safe and direct access to Romford Station
- New homes (private and affordable)

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FIRST BASE

Bridge Close, Romford



Next Steps

Thank you for attending the exhibition today. We welcome your comments and suggestions. Please feel free to:

- Complete a feedback form available at the exhibition
- Email consultation@bridgecloseromford.com

Timetable

We are starting to progress the plans for Bridge Close and would like to continue to speak to you to hear your comments and suggestions.

We are working to the following timeline:

- Public consultation – Autumn/Winter 2018/19
- Planning application submission – Spring 2019
- Start on site (subject to approval) – 2021

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FIRST BASE



Have Your Say

Regeneration of Bridge Close Industrial Estate

London Borough of Havering has entered into a joint venture with First Base, an urban regeneration specialist and Savills Investment Management, who own land in Bridge Close, to bring forward new homes, workspace, a new school and health services for Romford.

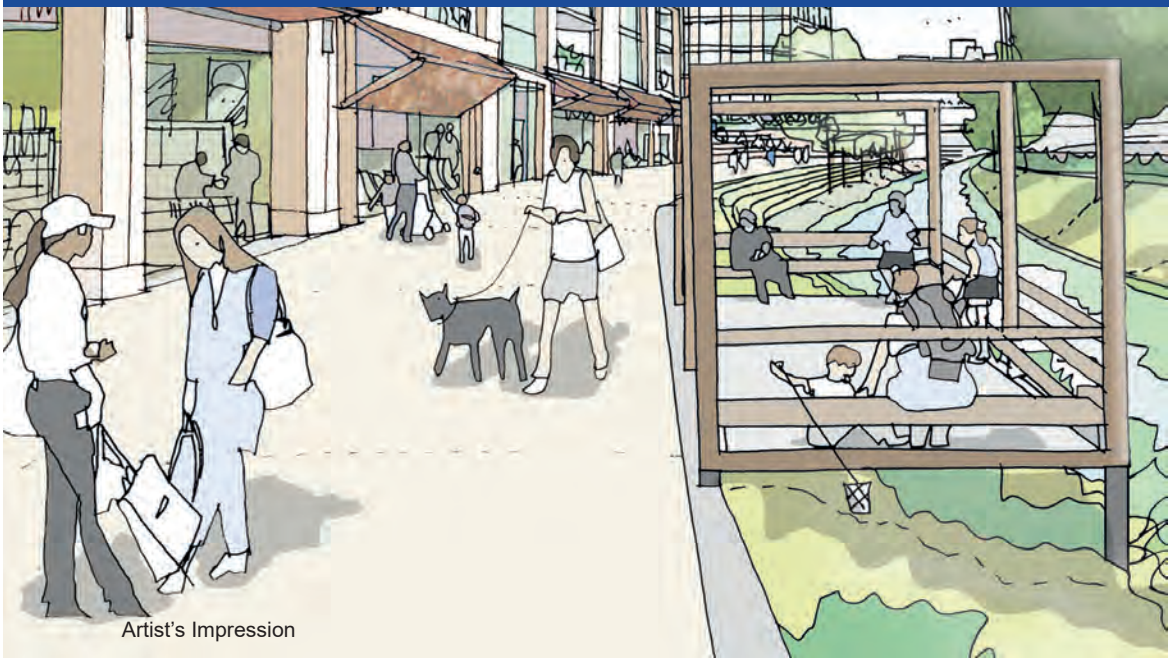
In addition, plans will also include a new pedestrian bridge with direct access to Romford station and the revitalisation of the stretch of the River Rom, so that it can be enjoyed by all.

For more information and to keep up to date with the proposals, visit: **www.bridgecloseromford.com.** Alternatively, email us: **consultation@bridgecloseromford.com**

www.bridgecloseromford.com

Havering LONDON BOROUGH

FIRST BASE



Artist's Impression

Next Steps

We are starting to progress these proposals and we would like to continue to speak to you and listen to comments and suggestions. We are working to the following timeline:

- Public consultation – Autumn/Winter 2018/19
- Planning application submission – Spring 2019
- Start on site (subject to approval) – 2021

There will be further opportunities to have your say and we look forward to meeting with you to present our proposals in further detail and hear your feedback.

YOUR FEEDBACK: PLANS FOR BRIDGE CLOSE, ROMFORD

Thank you for attending the public exhibition. Please provide us with your contact details so that we can keep you updated on our evolving plans.

Name:
……
Address:
……
Email:
……

Do you support the overall principle of the regeneration of Bridge Close Industrial Estate?
Yes ☐
No ☐
Don't Know ☐

Comments
……
……
……

We would like to take on your views as we develop our proposals

What would you like to see as part of the proposals? Tick as many boxes as you like
New homes ☐
New jobs ☐
Access to the River Rom ☐
New east-west link with access to Romford Station ☐
Cafes and restaurants ☐
Creative and cultural facilities ☐
Community facilities e.g. health and education ☐
Other ☐

Please specify
……
……

Do you have any other comments at this stage?

……
……

Please send any other comments you to consultation@bridgecloseromford.com

By submitting this form, you agree that we may publish your feedback in public, we will not publish your name and will only identify your area generally. We may also follow up to let you know about future consultations and events relating to Bridge Close. If you do not agree to this, please tick here ☐

Bridge Close, Romford



Welcome

Welcome to the second public exhibition on our proposals for Bridge Close, Romford Town Centre.

The first public exhibition in September 2018 outlined the broad vision for redeveloping the site. We are excited to now share our emerging ideas with you for this new quarter of Romford Town Centre, including the site layout and the proposed uses.

Our vision is to complement Romford's existing offer by delivering:

- **A new neighbourhood where people can live, work and play.**
- **Links to open up the town centre, revitalising a stretch of the River Rom and connecting existing neighbourhoods to Queen's Hospital.**
- **Around 1,070 new homes alongside a primary school and health services, as well as community and business space.**

Please feel free to browse the information in your own time, ask the team any questions and share your ideas. We would be grateful if you could take the time to complete a feedback form and provide your views.

All information on display today will be available on the project website www.bridgecloseromford.com from Monday 19 November.

What you told us in September 2018

In September we held our first consultation to showcase the principles for the redevelopment of the site, understand the community's views and gather feedback to inform the next steps of the proposals.

208 people attended our public exhibition at the Brewery Shopping Centre.

- 82% of respondents would like to see creative and cultural facilities as part of the proposals
- 78% of respondents would like to see community facilities as part of the proposals
- 73% would like to see access to the River Rom
- 70% would like a new link to Romford Station
- 67% would like to see new homes at the site

A selection of your comments:

- "We need new housing and that area needs a revamp"
- "Would like to see employment opportunities for local young people"
- "I would only support this project with the provision that good social infrastructure i.e. schools/ healthcare is included in any plans"
- "What level of affordable homes will be provided?"

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FIRST BASE

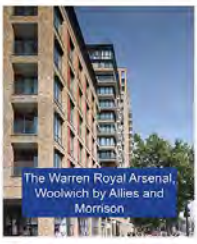
Bridge Close, Romford


Highbury Gardens, Highbury by First Base


Goodluck Hope, Tower Hamlets by Allies and Morrison

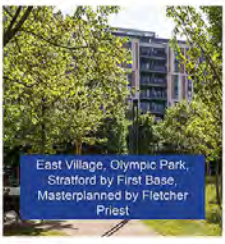

East Village, Olympic Park, Stratford by First Base, Masterplanned by Fletcher Priest


East Village, Olympic Park, Stratford by First Base, Masterplanned by Fletcher Priest


The Warren Royal Arsenal, Woolwich by Allies and Morrison


London Bridge Place by Spacehub


South Gardens, Elephant Park by Macreanor Lavington


East Village, Olympic Park, Stratford by First Base, Masterplanned by Fletcher Priest

About Us

Havering Council has entered into a joint venture with First Base and Savills Investment Management to redevelop Bridge Close.

Havering Council and First Base are committed to consulting with the local community as the proposals evolve. All feedback received at these events will be reviewed by the project team ahead of submitting a planning application to the Council.

Design Team
A first-class design team, with a track record of delivering exemplary schemes across London and the UK, has been appointed to bring forward the proposals.

Fletcher Priest
Fletcher Priest is a studio of architects, urban designers and interior designers with a broad range of experience at every scale from the design of interiors to the masterplanning of towns and cities.

Maccreanor Lavington
Maccreanor Lavington's diverse portfolio ranges from individual buildings to large scale urban design. It has particular expertise in housing, public buildings and the regeneration of town centres.

Allies and Morrison
Allies and Morrison is an architecture and urban planning practice based in London and Cambridge. Since its founding in 1984, the practice has developed a reputation for well-crafted buildings and thoughtful place making.

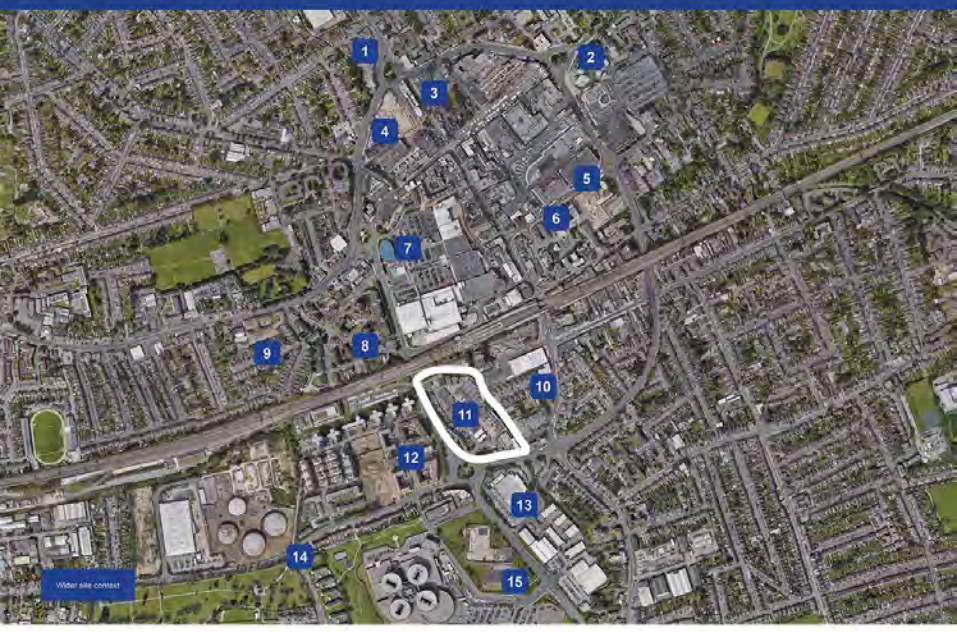
Spacehub
Spacehub is an innovative and passionate practice specialising in landscape architecture, urban design and ecology. They have an established reputation for delivering high-quality designs at a wide range of scales.

www.bridgecloseromford.com

Havering LONDON BOROUGH

FIRST BASE

Bridge Close, Romford



Key: Redevelopment sites in Romford Town Centre

1 Como Street	5 Romford Leisure Centre	9 Queen Street Estate	13 Homebase
2 The Verve	6 Station Quarter North	10 Atlanta Boulevard	14 Oldchurch Gardens Estate
3 North Street	7 The High Street	11 Bridge Close	15 Ice Arena
4 Angel Way	8 Waterloo Estate	12 Reflections	

The Site

The Bridge Close Industrial Estate is located at the junction of Waterloo Road and Oldchurch Road in Romford. The industrial estate is boarded by some residential properties on Waterloo Road and Oldchurch Road.

The River Rom runs through the industrial estate however it is hidden, unusable and prone to fly tipping.

The site is an important part of the plans to regenerate central Romford and provide much-needed new infrastructure and homes.

The Council agreed that the industrial estate at Bridge Close, and some of the adjoining residential properties fronting onto Waterloo Road and Oldchurch Road, would be redeveloped, subject to obtaining planning consent.



Opportunities

The site is in an excellent town centre location and has the potential to:

- Create new connections to the town centre and Queen's Hospital.
- Revitalise a stretch of the River Rom.
- Deliver new homes, including much needed affordable housing, in a sustainable location which benefits from first-class public transport links.
- Deliver a primary school for local children and health care facilities.
- Deliver long-term investment by the Council including careful management of the scheme into the future.

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Havering LONDON BOROUGH

FIRST BASE

Bridge Close, Romford



Creating a Neighbourhood

The redevelopment of Bridge Close will set a benchmark for future development in Romford. High-quality design will be supported by ongoing management by the Council, as well as a new primary school, health facilities and homes, including affordable housing.

The proposals will complement Romford Town Centre by delivering:

- A safe, active and inviting neighbourhood.
- New homes for the local community, including affordable homes.
- High-quality public spaces for the whole community to enjoy.
- Opening up the River Rom.
- Primary school for local children.
- Health facility to help address local demand.
- Business space, including affordable workspace.
- New community centre, including new space for the Havering Islamic Cultural Centre (HICC).
- Apprenticeships and training opportunities.



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Bridge Close, Romford


Community facilities for everyone


Primary School


Healthcare Centre

Health and Education

In addition to providing new homes, the proposals will deliver much-needed services for Romford.

This will help to meet the need for new school places, provide a health facility and support Romford's thriving community through the creation of new cultural facilities.

The proposals will deliver:

- **A new large health facility** that could provide a range of facilities from GP services to Mental Health services and pharmacy.
- **3-form entry primary school** delivered as part of the first phase with 630 school places for local children.
- **A nursery with 52 places** providing early childhood education.
- **A high-quality community hub** for Romford, including improved facilities for Havering Islamic Cultural Centre.


Primary School by Macreanor Lavington


Primary School by Macreanor Lavington

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FIRST BASE

Bridge Close, Romford



Creating Connections

Gateway to the Town Centre

The site currently suffers from poor accessibility, being surrounded by the ring road, railway line and river. The plans will open up new links, including a bridge over the River Rom, and create a gateway into the town centre.

The new east-west link, across the River Rom through to Waterloo Road, will provide quicker and safer access to Romford Station and the town centre.

The link will also provide direct access to Crossrail as well as Queen's Hospital.

The site's town centre location benefits from excellent public transport connections. A travel plan will encourage new residents to use these excellent public transport links.


Indicative image of pedestrian and cycle route


Indicative image of children's play area

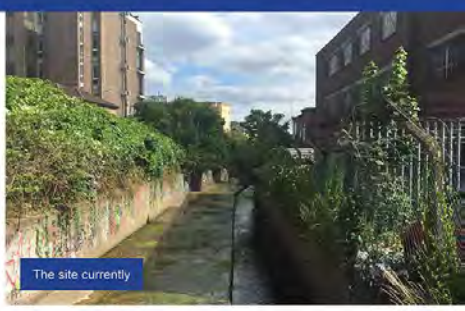
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Bridge Close, Romford


Indicative image of bridge over the river


The site currently


Indicative image of river walkway

Revitalising the River Rom

The proposals will provide a new pedestrian and cycle bridge over the River Rom, transforming the area into attractive and active public space.

The current bridge over the River Rom is underused and feels unsafe to many residents. By improving the bridge and the surrounding area it will become a livelier and safer connection for everyone in Romford.

This stretch of the river, which is currently a hidden asset in the town centre, will become a vibrant public space, with new walkways, planting and seating.

The green linear park along this stretch of the river will promote health and wellbeing and provide active spaces for people to exercise and relax.


Active spaces for people to relax and exercise

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FIRST BASE

Bridge Close, Romford

205
Construction jobs created per year

Affordable Workspace

650
Direct and indirect local jobs created

£4m
Generated in local spend from new residents and businesses

Figures are estimates based on economic benefit summary carried out by Savills

Jobs for Romford

The proposals will be a catalyst for Romford Town Centre, drive up footfall for existing businesses and boost the local economy.

Workspaces for a range of businesses, including affordable spaces, will help Romford's smaller businesses and start-ups to flourish.

Construction jobs

During the construction phase, our contractors will provide job opportunities for the local area as well as apprenticeship and training opportunities.


Indicative image of commercial space


Indicative image of maker space


Indicative image of maker space

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FIRST BASE

Inclusive Engagement and Next Steps

Thank you for visiting.

Please take the time to complete a feedback form before you leave to let us know your views on our proposals.

You can take a feedback form away and return it via Freepost, or fill it out on our website. All the information displayed at this event will be available to view online from Monday 19 November.

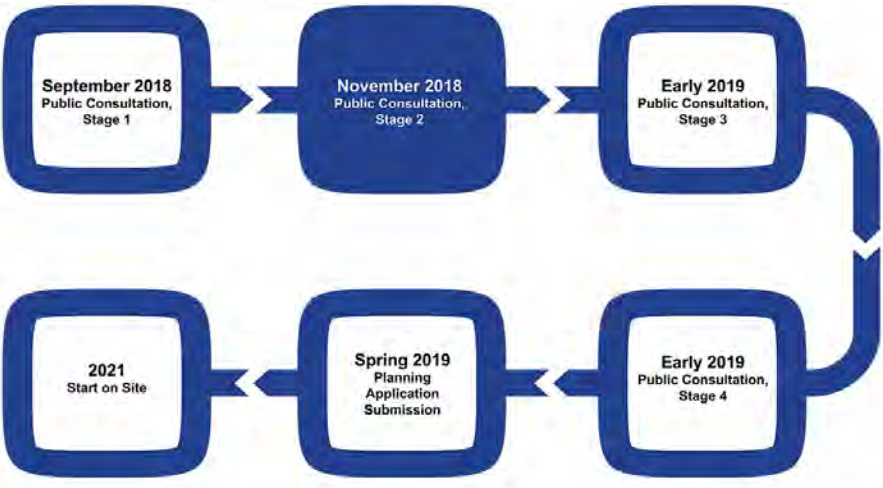
Subject to planning consent, the scheme will be delivered in a number of phases. Commencement on the first phase is anticipated to start in 2021 and the development is expected to take up to 10 years in total.

We are committed to engaging with the local community. If you would like to find out more about our proposals, or if you have any questions, please do not hesitate to contact us.

To keep up to date on the process and receive updates, sign up to our mailing list by visiting www.bridgecloseromford.com.

You Would Like To See	Our Commitment
Creative and Cultural facilities	To provide affordable workspace for Romford's small businesses and creative start-ups.
Community facilities	A new healthcare centre and primary school along with a community centre, including a new space for the Havering Islamic Cultural Centre.
Access to the River Rom	To transform a stretch of the River Rom delivering significant environmental improvements and creating new public spaces.
A new link to Romford Station	Create a new east-west link to provide quicker and safer access to Romford Station and the town centre.
New homes in Romford	Deliver around 1,070 new homes in Romford Town Centre, including affordable homes.

Project Timeline





Welcome to the second public exhibition on our proposals for Bridge Close, Romford Town Centre.

London Borough of Havering has entered into a joint venture with First Base and Savills Investment Management who control land within the Bridge Close Industrial Estate.

The first public exhibition in September 2018 outlined the broad vision for redeveloping the site. We are excited to now share our emerging ideas.

Our vision is to complement Romford's existing offer by delivering:
• A new neighbourhood where people can live, work and play.
• Links to open up the Town Centre, revitalising a stretch of the River Rom and connecting existing neighbourhoods to Queen's Hospital.
• Around 1,070 new homes alongside a primary school and health services, as well as community and business space.

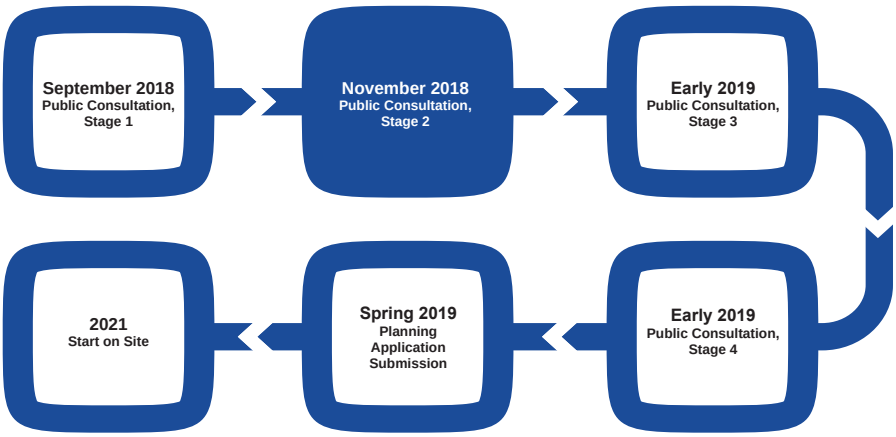
For more information and to keep up to date with the proposals, visit: www.bridgecloseromford.com.

The redevelopment of Bridge Close will set a benchmark for future development in Romford.

The proposals will complement Romford Town Centre by delivering:

- A safe, active and inviting neighbourhood.
- New homes for the local community, including affordable homes.
- High-quality public spaces for the whole community to enjoy.
- Opening up the River Rom.
- Primary school for local children.
- Health facility to help address local demand.
- Business space, including affordable workspace.
- New community centre, including new space for the Havering Islamic Cultural Centre.
- Apprenticeships and training opportunities.





If you would like to find out more about our proposals, or if you have any questions, please do not hesitate to contact us.

Contact us
Email: consultation@bridgecloseromford.com **Telephone:** 020 7871 3565

Bridge Close, Romford

Your Feedback:
Proposals for Bridge Close, Romford

Name:	
Address:	Postcode:
Email:	Phone:

Please indicate which of the following apply to you (please tick all that apply):

- ☐ I live locally
- ☐ I work locally
- ☐ I am a member of a local group
  Please specify:

How often do you use the town centre?

- ☐ Once a day
- ☐ 3-5 times a week
- ☐ Weekly
- ☐ Monthly
- ☐ Not very often

What do you use the town centre for? (Please tick all that apply):

- ☐ Commuting
- ☐ Shopping
- ☐ Childcare
- ☐ Community Facilities
- ☐ Culture
- ☐ Recreation
- ☐ Education
- ☐ Work
- ☐ Leisure
- ☐ Pubs/Nightlife
- ☐ Events
- ☐ Dining
- ☐ Health
- ☐ Socialising
- ☐ Other (please specify): _____

Please indicate your level of support for the following aspects of the proposals:

	Strongly Support	Support	Neutral	Oppose	Strongly Oppose
A new primary school	☐	☐	☐	☐	☐
New homes for Romford, including a range of affordable homes	☐	☐	☐	☐	☐
Healthcare centre	☐	☐	☐	☐	☐
Community centre	☐	☐	☐	☐	☐
Opening up the River Rom as a new public space	☐	☐	☐	☐	☐
A new east-west link to provide quicker access to Romford town centre	☐	☐	☐	☐	☐
A range of commercial spaces, including affordable workspace and cafes	☐	☐	☐	☐	☐

Having viewed these initial proposals, do you support the emerging plans for Bridge Close?

☐ Yes ☐ No ☐ Neutral ☐ Undecided

Please explain the reason for your answer:

What are the greatest challenges in your area with respect to jobs, skills, supporting local businesses, social issues and protecting the environment? What support does the community need to solve these challenges?

Please let us know any other comments you may have at this point:

Please tick if you would like to be kept informed about the planning application (your details will remain confidential and not be passed to any third party): ☐

Please return this survey in the box provided or to:
FREEPOST RTUA-THGR-LUYK
Public Consultation (Cascade)
26 Noel Street, London, W1F 8GY

Email:
consultation@bridgecloseromford.com
Telephone:
020 7871 3565

All data received will be processed by Cascade Communications on behalf of First Base. All data will be kept in accordance with relevant data protection legislation including the General Data Protection Regulations (GDPR). Contact information will only be used to update neighbours on information relating to this project and your data will be kept for no longer than two years. Feedback will be reviewed by First Base and their consultants and an anonymised summary will be submitted to the London Borough of Havering as part of the planning application. Further details can be found in our privacy statement. Please contact us for details.

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Bridge Close
Romford

Welcome



Site outline

Welcome to the third stage of public consultation on the emerging proposals for Bridge Close in Romford Town Centre.

Last year we held two public consultations in September and November to first explain the broad vision for the planned redevelopment of the site and then to share our initial ideas with the community, including the proposed site layout and the mix of uses.

Vision

Our vision seeks to complement Romford's existing offer by delivering:

- A new neighbourhood where people can live, work and play.
- New links to open up the town centre, simultaneously revitalising a stretch of the River Rom and connecting existing neighbourhoods to Queen's Hospital.
- Around 1,070 new homes, including affordable homes, to meet a range of housing needs.
- A new primary school, nursery and healthcare facility to support both existing and future residents.
- Community and business space.

Please feel free to browse the information in your own time, ask the team any questions and share your ideas. We would be grateful if you could take the time to complete a feedback form and provide us with your views.

All information on display today will be available on the project website from 13th May 2019.

What you told us in November 2018

In November 2018 we held our second round of community consultation to share the emerging plans, understand the community's views and gather feedback to inform the next steps of the proposals.

300 people attended our second exhibition at The Mercury shopping centre, meaning over 500 residents have already engaged with the consultation to date.

- **72%** support the emerging proposals for Bridge Close.
- **72%** of respondents visit the town centre every day or at least three times a week.
- **88%** of respondents use the town centre for shopping, but socialising, leisure and commuting also ranked highly.

When asked for their views on specific aspects of the emerging plans:

- **79%** support the delivery of a range of new homes, including affordable homes.
- **95%** support the creation of a new healthcare centre.
- **79%** were in favour of new commercial space, including affordable workspace.
- **91%** would like to see the River Rom opened up as public space.
- **87%** are in favour of a new east-west link to improve access to the town centre and station.
- **89%** support the introduction of a new community centre.

A selection of your comments:

"I think using this space for more housing, a primary school and a new medical centre is a fantastic idea"

"I am concerned that many small businesses/workshops will be forced to move"

"Whilst it looks good, it will provide housing but infrastructure is not in place to cope with additional families"

"Regeneration of the area is needed, desperately"

"It will be good for the area and includes all the facilities needed without being a burden on existing infrastructure"

"I want to open up the Rom"

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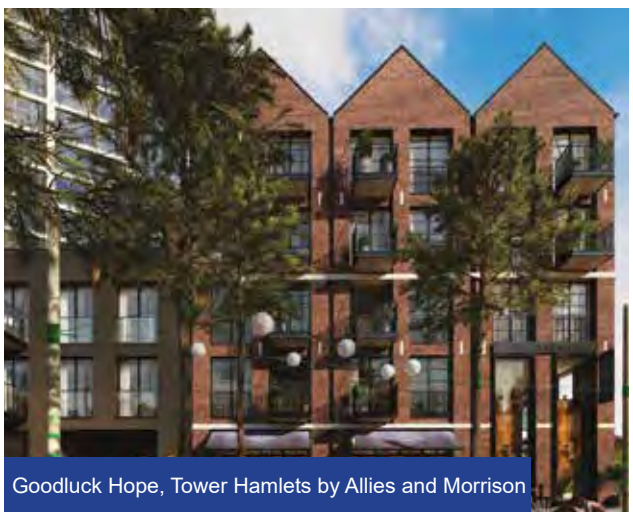
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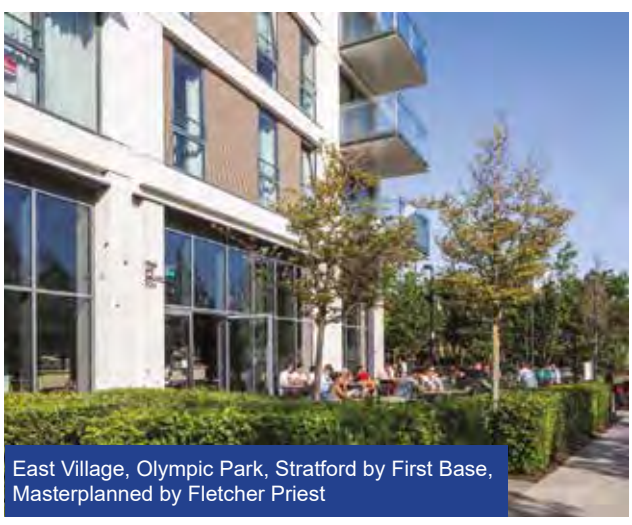
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Bridge Close
Romford

About us


Highbury Gardens, Highbury by First Base


Goodluck Hope, Tower Hamlets by Allies and Morrison


East Village, Olympic Park, Stratford by First Base, Masterplanned by Fletcher Priest


East Village, Olympic Park, Stratford by First Base, Masterplanned by Fletcher Priest


The Warren Royal Arsenal, Woolwich by Allies and Morrison


London Bridge Place by Spacehub


South Gardens, Elephant Park by Macreanor Lavington


East Village, Olympic Park, Stratford by First Base, Masterplanned by Fletcher Priest

The London Borough of Havering

In April 2018 the London Borough of Havering entered into a joint venture with First Base and Savills Investment Management to bring forward plans for the redevelopment of Bridge Close in Romford, as part of a wider vision and high profile growth agenda in the borough.

There is a demand for additional housing in the borough particularly in a location that is close to excellent public transport connections, shopping and leisure facilities. Bridge Close was allocated as a key site for residential development in the Romford Area Action Plan 2008 and this was also reflected in the Romford Redevelopment Framework agreed by Havering Council's Cabinet in July 2015.

At the June 2016 Cabinet meeting, Havering Council agreed that Bridge Close could be taken forward for redevelopment, for mainly residential use. The plans that will be delivered following consultation with residents and stakeholders will bring forward homes, some commercial space and a new bridge to allow quick access to Romford station.


Havering town hall

An award-winning design team

A first-class design team, with a track record of delivering exemplary schemes across London and the UK, has been appointed to bring forward the proposals.

Fletcher Priest are the masterplanners for the project. **Maccreanor Lavington** and **Allies and Morrison** will be designing the buildings and spaces for the first phase of the proposed development.

Fletcher Priest

Fletcher Priest is a studio of architects, urban designers and interior designers with a broad range of experience at every scale, from the design of interiors to the masterplanning of towns and cities.

Maccreanor Lavington

Maccreanor Lavington's diverse portfolio ranges from individual buildings to large scale urban design. It has particular expertise in housing, the regeneration of town centres and educational buildings, having previously designed several new schools as part of mixed-use developments.

Allies and Morrison

Allies and Morrison is an architecture and urban planning practice based in London and Cambridge. Since its founding in 1984, the practice has developed a reputation for well-crafted buildings and thoughtful place making.

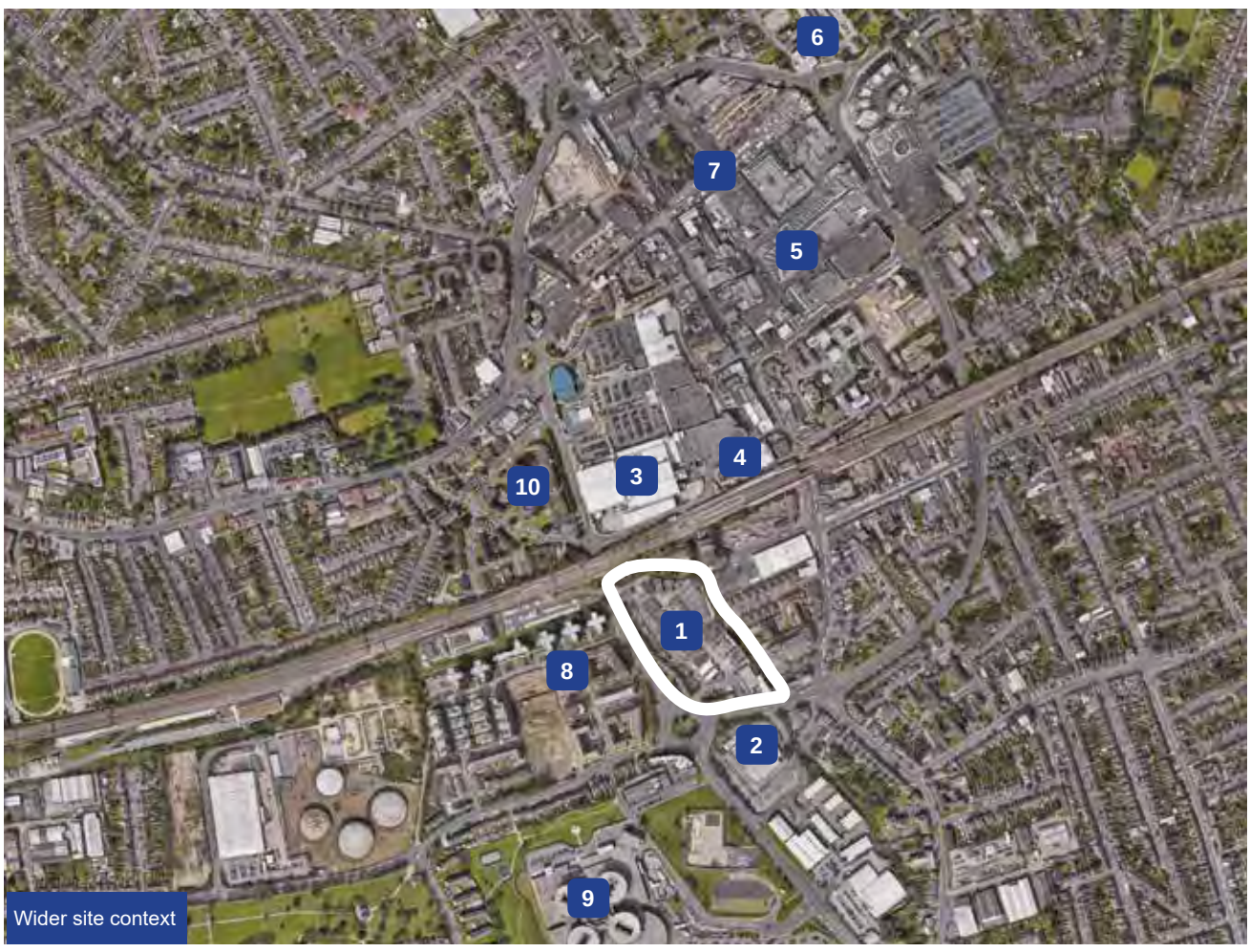
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Bridge Close
Romford

The site



Wider site context

Key: Local context

1 Bridge Close	2 Homebase	3 The Brewery	4 Romford Train Station
5 The Liberty Shopping Centre	6 The Town Hall	7 Market Place	8 Oldchurch Rise/ Reflections
9 Queen's Hospital	10 Waterloo Estate		

The Bridge Close Industrial Estate is located at the junction of Waterloo Road and Oldchurch Road in Romford. The industrial estate is bordered by residential properties on Waterloo Road and Oldchurch Road.

The River Rom runs through the industrial estate, however it is hidden, unusable and subject to fly tipping.

The site is an important part of the plans to regenerate central Romford and provide much-needed new infrastructure and homes.

Bridge Close offers the opportunity to provide a new high-quality place-led part of Romford where people can live, work and play.

Opportunities
The site benefits from an excellent town centre location and has the potential to:

- Create new connections to the town centre and Queen's Hospital.
- Revitalise a hidden and neglected stretch of the River Rom.
- Deliver new homes, including much needed affordable housing, in a sustainable location which benefits from first-class public transport links.
- Deliver a new primary school for local children and new healthcare facilities.
- Deliver long-term investment by the Council including careful management of the scheme into the future.



Constraints on the site

1	Flood risk (Zone 2)
2	Ring road
3	Underpass
4	Existing bridge
5	New crossing location
6	Proposed bridge location
7	Embankment level difference
8	River edge (8m. setback)
9	Thames Water sewer (5m. setback)
10	Gas main 3m. setback
11	Existing mature trees
12	Level change around the site
13	Existing access from roundabout

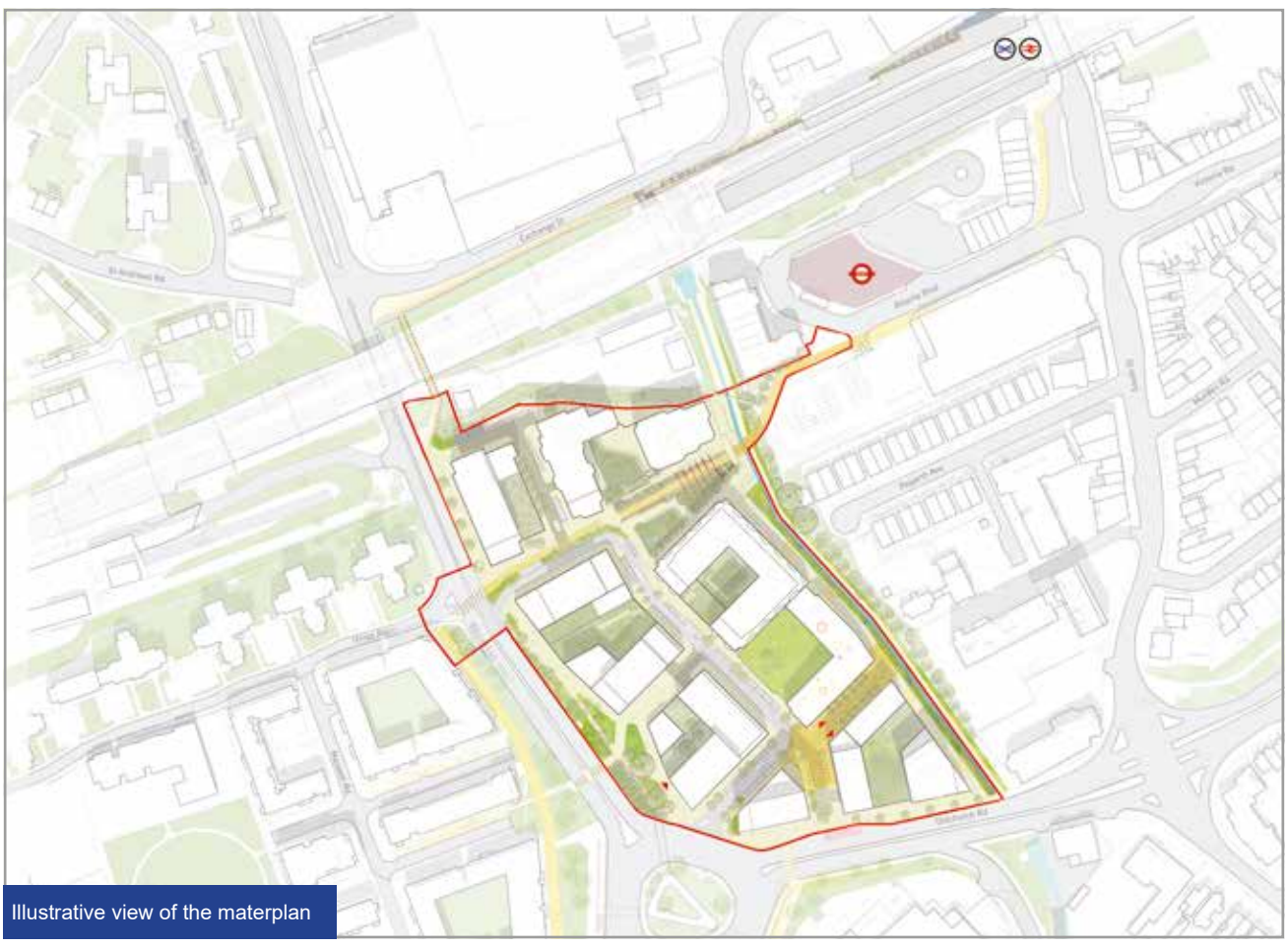
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Bridge Close
Romford

Creating a neighbourhood



Illustrative view of the materplan

The redevelopment of Bridge Close will set a benchmark for future development in Romford.

In line with the Council's ambition for Romford, the plans will create a safe, active and inviting neighbourhood which complements Romford Town Centre by delivering:

- Around 1,070 new homes for the local community, including affordable homes.
- High-quality public spaces for the whole community to enjoy.
- Improved accessibility and new links through the site, including opening up River Rom.
- A new primary school for local children.
- A new healthcare facility to help address local demand.
- High-quality business space, including affordable workspace to support local small to medium-sized companies or start-ups.
- New community centre, including new space for the Havering Islamic Cultural Centre.
- Local employment opportunities.
- High-quality design and placemaking will be supported by long term estate management.

Masterplan for Bridge Close
The emerging mixed-use proposals will be delivered across the site in blocks which will be designed to fit with the evolving townscape of Romford Town Centre. The proposed building heights range from 6 to 14 storeys.

Building heights vary to create good space standards whilst taking account of views from around the site. Orientation and heights of buildings have been carefully considered to ensure high-quality public spaces are created between buildings.



Indicative image of public space

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Bridge Close
Romford

Delivering improvements to local infrastructure



Illustrative sketch of the new school and health centre

In addition to providing new homes, commercial space and public open spaces, the proposals will also deliver much-needed services for Romford residents.

This will help to meet the need for new school places, provide a healthcare facility and support Romford's thriving community through the creation of new community facilities.

The proposals will deliver:

- A new large healthcare facility that could provide a range of facilities from GP services to mental health services and a pharmacy.
- A three-form entry primary school as part of the first phase with 630 school places for local children, including additional specialist facilities for children with Special Educational Needs and Disabilities (SEND).
- A nursery with 52 places providing early childhood education.
- A high-quality community hub for Romford, including improved facilities for Havering Islamic Cultural Centre.
- A new bridge across the River Rom to improve connectivity and links with the town centre, as well as improvements to the existing bridge which links to Regarth Avenue.

In addition, the proposals would secure significant planning contributions to support wider improvements to community infrastructure in Romford.


Indicative image of a healthcare centre


Indicative image of a primary school


Indicative image of a primary school


Indicative image of a primary school

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Bridge Close
Romford

Public realm and street scene



Illustrative sketch of a new street

The proposals will create a range of streets and public spaces that seamlessly link and provide improved accessibility through the site.

Spaces will be safe and welcoming, creating a high quality environment for residents and neighbouring communities to enjoy.

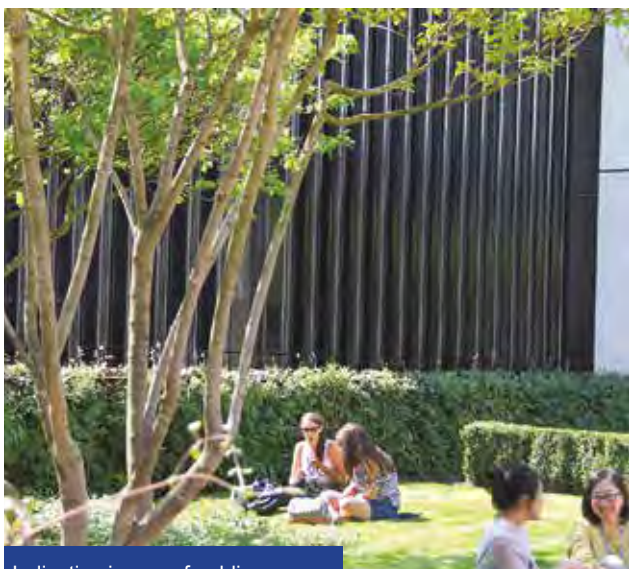
The landscape proposals will deliver:
- Significant areas of green open space.
- New children's play areas.
- A trim trail and informal running loop.
- Substantial areas of tree planting
- Environmental improvements to Waterloo Road.
- An increase in biodiversity and habitat areas for wildlife.
- New pedestrian and cycle links across the River Rom and Waterloo Road.



Indicative image of public space



Indicative image of public space



Indicative image of public space

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Bridge Close
Romford

New and improved links



Illustrative sketch of the new crossing over Waterloo Road

The site currently suffers from poor accessibility as it is constrained by the ring road, railway line and river. The plans will open up new links and create a gateway into the town centre.

The new east-west link, across the River Rom through to Waterloo Road, will provide quicker and safer access to Romford Station and the town centre.

The site's town centre location benefits from excellent public transport connections. A travel plan will enable new residents, workers and visitors to conveniently use these excellent public transport links and sustainable forms of transport.

The site has a Public Transport Accessibility Level (PTAL) rating of 6a - the second highest rating. PTAL is a measure which rates locations by distance from frequent public transport services.



Proposed connections plan

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Bridge Close
Romford

Revitalising the River Rom



Illustrative sketch of the river walkway

The proposals will provide a new pedestrian and cycle bridge over the River Rom, transforming the area into an open, attractive and active public space.

The current bridge over the river is underused and feels unsafe to many residents. By building a new bridge to Romford railway station and improving the surrounding area, it will become a livelier and safer connection for everyone in Romford to use.

The stretch of the River Rom within the site is a hidden and underutilised asset in the town centre. It will become a vibrant public space with new walkways, planting and seating.

The green linear park along this stretch of the river will promote health and wellbeing by providing active spaces for people to exercise and relax.



Examples of high-quality riverside public space



Examples of high-quality riverside public space

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Bridge Close
Romford

Jobs for Romford



Illustrative sketch of the new public square

The proposals will be a catalyst for Romford Town Centre, helping to drive up footfall for existing businesses and boost the local economy.

Workspaces for a range of businesses, including affordable spaces, will help Romford's smaller businesses and start-ups flourish in a sustainable town centre location.

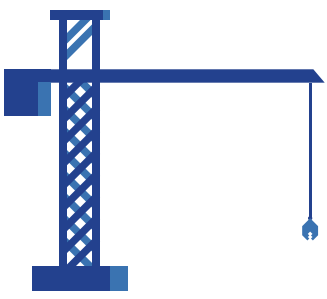
We anticipate that the proposed business and commercial space could support a significant number of local employment opportunities, alongside jobs created at the new primary school and healthcare facility.

Employment opportunities during construction
During the construction phase our contractors will provide employment and training opportunities for the local community, as well as apprenticeships.

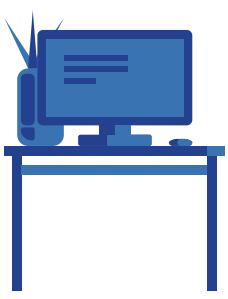
We will also work with our contractors to support Romford's economy by promoting a local procurement strategy, which means we will aim to use local suppliers of materials, specialist tradespeople and workers wherever possible.



The Mayor of Havering and Leader of the Council with local apprentices



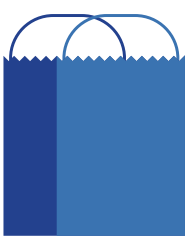
205
Construction jobs created per year



Affordable
workspace



650
Direct and indirect local jobs created



£4m
Generated in local spend from new residents and businesses

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Bridge Close
Romford

Inclusive community engagement

Thank you for visiting today.

Please take the time to complete a feedback form before you leave to let us know your views on the emerging proposals for Bridge Close.

You can take a feedback form away and return it by Freepost, or fill one out online at **www.bridgecloseromford.com.** All of the information displayed at this event will be available to view online from 13th May 2019.

If you would like to find out more about our proposals, please do not hesitate to get in contact with us or register online for email updates

Next steps

The London Borough of Havering and First Base are committed to engaging with the local community. Following this stage of consultation, we are expecting to hold a further consultation in the early summer.

The overall masterplan will be delivered in phases. Subject to planning consent, we anticipate that construction of the first phase will begin in 2021 and the overall development is expected to take up to 10 years.

Project timeline

September 2018
Stage 1 of public consultation

November 2018
Stage 2 of public consultation

May 2019
Stage 3 of public consultation

Summer/Autumn 2019
Stage 4 of public consultation

Autumn/Winter 2019
Submission of a planning application

2021
Anticipated date for works to start on site

Delivering the masterplan

The masterplan will be delivered using a phased approach, with the outline plans for the overall site being submitted later this year alongside detailed plans for the first phase.

The first phase of development will include:

- Around 400 homes, including affordable homes.
- Commercial space for businesses.
- The three-form entry primary school.
- Improvements to River Rom.
- The new bridge and crossing over Waterloo Road to create the east-west connection.
- The new public square and associated landscaping.



Illustrative plan of the first phase

Havering LONDON BOROUGH

FIRST BASE

www.bridgecloseromford.com

Bridge Close
Romford



Thank you for attending the third public exhibition on our proposals for Bridge Close, Romford Town Centre.

In April 2018 the London Borough of Havering entered into a joint venture with First Base and Savills Investment Management to bring forward plans for the redevelopment of Bridge Close in Romford, as part of a wider vision and high profile growth agenda in the borough.

The first public exhibition in September 2018 outlined the broad vision for redeveloping the site, and the second public exhibition in November 2018 provided more details on our proposal. We are excited to outline how the plans have progressed in response to local aspirations and ambitions, as well as the feedback received at the events in September and November 2018.

Vision

Our vision seeks to complement Romford's existing offer by delivering:

- A new neighbourhood where people can live, work and play.
- New links to open up the town centre, simultaneously revitalising a stretch of the River Rom and connecting existing neighbourhoods to Queen's Hospital.
- Around 1,070 new homes, including affordable homes, to meet a range of housing needs.
- A new primary school, nursery and healthcare facility to support both existing and future residents.
- Community and business space.

For more information and to keep up to date with the proposals, visit:
www.bridgecloseromford.com.
Alternatively, email us:
consultation@bridgecloseromford.com

Bridge Close
Romford

The redevelopment of Bridge Close will set a benchmark for future development in Romford. High-quality design and placemaking will be supported by long term estate management.



Illustrative sketch of the river walkway

In line with the Council's ambition for Romford, the plans will create a safe, active and inviting neighbourhood which complements Romford Town Centre by delivering:

- New homes for the local community, including affordable homes.
- High-quality public spaces for the whole community to enjoy.
- Improved accessibility and new links through the site, including opening up of the River Rom.
- A new primary school for local children.
- A new healthcare facility to help address local demand.
- High-quality business space, including affordable workspace to support local small to medium-sized companies or start-ups.
- New community centre, including new space for the Havering Islamic Cultural Centre.
- Local employment opportunities.

Next steps

September 2018
Stage 1 of public consultation

November 2018
Stage 2 of public consultation

May 2019
Stage 3 of public consultation

Summer/Autumn 2019
Stage 4 of public consultation

Autumn/Winter 2019
Submission of a planning application

2021
Anticipated date for works to start on site

We are committed to engaging with the local community. If you would like to find out more about our proposals, or if you have any questions, please do not hesitate to contact us.

To keep up to date on the process and receive updates, sign up to our mailing list by visiting **www.bridgecloseromford.com.**

Contact us

Email: consultation@bridgecloseromford.com
Telephone: 020 7871 3565

Bridge Close
Romford

YOUR FEEDBACK: PROPOSALS FOR BRIDGE CLOSE, ROMFORD

Name: _____

Address: _____

_____

Postcode: _____ Telephone: _____

Email: _____

1. Please indicate which of the following apply to you (please tick all that apply):

☐ I live locally ☐ I work locally ☐ I am a member of a local group.

Please specify: _____

2. How do you currently travel around the area?

☐ Walk ☐ Cycle ☐ Car ☐ Public transport

3. What do you use the town centre for? (Please tick all that apply)

☐ Commuting ☐ Work ☐ Shopping ☐ Leisure ☐ Childcare

☐ Pubs/ Nightlife ☐ Community facilities ☐ Events ☐ Culture ☐ Dining

☐ Recreation ☐ Health ☐ Education ☐ Socialising

☐ Other, please specify: _____

4. Please indicate your level of support for the following aspects of the proposals:

	Strongly support	Support	Neutral	Do not support	Strongly do not support
A new primary school					
New homes for Romford, including a range of affordable homes					
Healthcare centre					
Community centre					
Opening-up the River Rom as a new public space					
A new east-west link to provide quicker access to Romford town centre					
A range of commercial spaces, including affordable workspace and cafés					

Bridge Close
Romford

5. Did you attend our second public exhibition at The Mercury Hall?

☐ Yes ☐ No

6. Having viewed these initial proposals, do you support the emerging plans for Bridge Close?

☐ Yes ☐ No ☐ Neutral ☐ Undecided

Please explain the reason for your answer:

7. Please explain if there is a specific location where improvements need to be targeted and why?

8. Please let us know any other comments you may have at this point:

☐ Please tick if you would like to be kept informed about the planning application (your details will remain confidential and not be passed to any third party)

All data received will be processed by Cascade Communications on behalf of First Base. All data will be kept in accordance with relevant data protection legislation including the General Data Protection Regulations (GDPR). Contact information will only be used to update neighbours on information relating to this project and your data will be kept for no longer than two years. Feedback will be reviewed by First Base and their consultants and an anonymised summary will be submitted to the London Borough of Havering as part of the planning application. Further details can be found in our privacy statement. Please contact us for details.

Please return this survey in the box provided or to:

FREEPOST RTUA-THGR-LUYK
Public Consultation (Cascade),
26 Noel Street,
London,
W1F 8GY

Email: consultation@cascadepr.co.uk
Telephone: 020 7871 3565

Bridge Close
Romford

Welcome


Site outline

Welcome to the final stage of public consultation on the emerging proposals for Bridge Close in Romford Town Centre.

Beginning in September 2018, we have held three stages of public consultations explaining the broad vision for the planned redevelopment of the site and gathering a range of feedback which has directly influenced the emerging plans. We would now like to share the most up to date proposals, before they are submitted as a planning application.

Vision

Our vision seeks to complement Romford's existing offer by delivering:

- A new neighbourhood where people can live, work and play.
- New links to open up the town centre, simultaneously revitalising a stretch of the River Rom and connecting existing neighbourhoods to Queen's Hospital.
- Around 1,070 new homes, including affordable homes, to meet a range of housing needs.
- A new primary school, nursery and healthcare facility to support both existing and future residents.
- Community and business space.

Please feel free to browse the information in your own time, ask the team any questions and share your ideas. We would be grateful if you could take the time to complete a feedback form and provide us with your views.

All of the information displayed today will be available on the project website from 16th September 2019.

Four
stages of public consultation

900+
residents engaged at public events

23,000
letters and **50,000** emails to publicise the events

96,746
residents viewed social media posts

11,000
questions answered by voters online

24
hours of face-to-face engagement

A selection of your comments:

I believe it is a good use of space and the community will benefit a lot from these changes. Having another green space in the area will not only help the atmosphere but encourage young people to be outdoors more.

Resident of Union Road, RM7

River Rom area needs to be made accessible and attractive to public to use. The crossing from the town centre needs improvement. It's dingy and unattractive. It should be bright, and approach should be made easy.

Resident of Rosedale Road, RM1

It is a much-needed initiative for this area. Although I do wonder how all of this going to be in line with current infrastructure. We can all work together to bring community together and work for the betterment of everyone.

Resident of Lodge Avenue, RM2

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Bridge Close
Romford

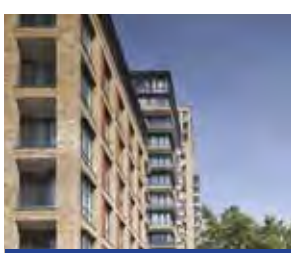
About us


Highbury Gardens, Highbury by First Base


Goodluck Hope, Tower Hamlets by Allies and Morrison

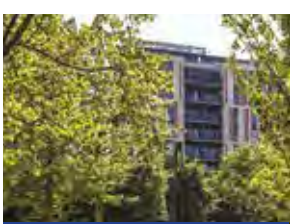

East Village, Olympic Park, Stratford by First Base, Masterplanned by Fletcher Priest


East Village, Olympic Park, Stratford by First Base, Masterplanned by Fletcher Priest


The Warren Royal Arsenal, Woolwich by Allies and Morrison


London Bridge Place by Spacehub


South Gardens, Elephant Park by Macreanor Lavington


East Village, Olympic Park, Stratford by First Base, Masterplanned by Fletcher Priest

The London Borough of Havering

In April 2018 the London Borough of Havering entered into a joint venture with First Base and Savills Investment Management to bring forward plans for the redevelopment of Bridge Close in Romford, as part of a wider vision and high profile growth agenda in the borough.

There is a demand for additional housing in the borough particularly in a location that is close to excellent public transport connections, shopping and leisure facilities. Bridge Close was allocated as a key site for residential development in the Romford Area Action Plan 2008 and this was also reflected in the Romford Redevelopment Framework agreed by Havering Council's Cabinet in July 2015.

At the June 2016 Cabinet meeting, Havering Council agreed that Bridge Close could be taken forward for redevelopment, for mainly residential use. The plans that will be delivered following consultation with residents and stakeholders will bring forward homes, some commercial space and a new bridge to allow quick access to Romford station.


Havering town hall

An award-winning design team

A first-class design team, with a track record of delivering exemplary schemes across London and the UK, has been appointed to bring forward the proposals.

Fletcher Priest are the masterplanners for the project. Maccreanor Lavington and Allies and Morrison are designing the buildings and spaces for the first phase of the proposed development.

Fletcher Priest

Fletcher Priest is a studio of architects, urban designers and interior designers with a broad range of experience at every scale, from the design of interiors to the masterplanning of towns and cities.

Maccreanor Lavington

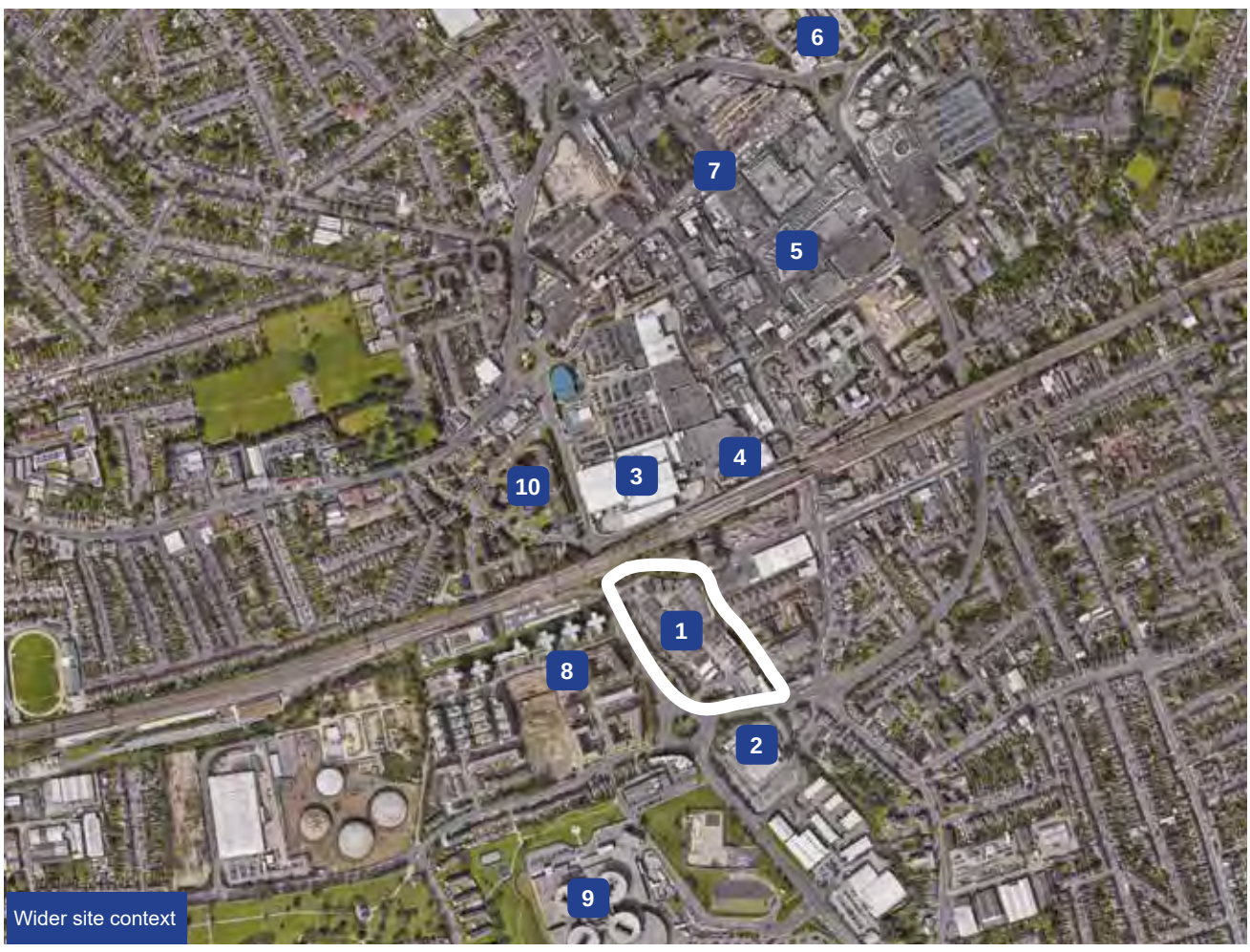
Maccreanor Lavington's diverse portfolio ranges from individual buildings to large scale urban design. It has particular expertise in housing, the regeneration of town centres and educational buildings, having previously designed several new schools as part of mixed-use developments.

Allies and Morrison

Allies and Morrison is an architecture and urban planning practice based in London and Cambridge. Since its founding in 1984, the practice has developed a reputation for well-crafted buildings and thoughtful place making.

Bridge Close
Romford

The site



Wider site context

Key: Local context

1 Bridge Close	2 Homebase	3 The Brewery	4 Romford Train Station
5 The Liberty Shopping Centre	6 The Town Hall	7 Market Place	8 Oldchurch Rise/ Reflections
9 Queen's Hospital	10 Waterloo Estate		

The Bridge Close Industrial Estate is located at the junction of Waterloo Road and Oldchurch Road in Romford. The industrial estate is bordered by residential properties on Waterloo Road and Oldchurch Road.

The River Rom runs through the industrial estate, however it is hidden, unusable and subject to fly tipping.

The site is an important part of the plans to regenerate central Romford and provide much-needed new infrastructure and homes.

Bridge Close offers the opportunity to provide a new high-quality place-led part of Romford where people can live, work and play.

Opportunities
The site benefits from an excellent town centre location and has the potential to:
- Create new connections to the town centre and Queen's Hospital.
- Revitalise a hidden and neglected stretch of the River Rom.
- Deliver new homes, including much needed affordable housing, in a sustainable location which benefits from first-class public transport links.
- Deliver a new primary school for local children and new healthcare facilities.
- Deliver long-term investment by the Council including careful management of the scheme into the future.



Constraints on the site

1 Flood risk (Zone 2)
2 Ring road
3 Underpass
4 Existing bridge
5 New crossing location
6 Proposed bridge location
7 Embankment level difference
8 River edge (8m. setback)
9 Thames Water sewer (5m. setback)
10 Gas main 3m. setback
11 Existing mature trees
12 Level change around the site
13 Existing access from roundabout

Delivering the masterplan
The masterplan will be delivered using a phased approach, with the outline plans for the overall site being submitted later this year alongside detailed plans for the first phase.

The first phase of development will include:
- Around 400 homes, including affordable homes.
- Commercial space for businesses.
- The three-form entry primary school.
- Improvements to River Rom.
- The new bridge and crossing over Waterloo Road to create the east-west connection.
- The new public square and associated landscaping

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Bridge Close
Romford

Creating a neighbourhood



Illustrative view of the masterplan

The redevelopment of Bridge Close will set a benchmark for future development in Romford.

In line with the Council's ambition for Romford, the plans will create a safe, active and inviting neighbourhood which complements Romford Town Centre by delivering:

- Around 1,070 new homes for the local community, including affordable homes.
- High-quality public spaces for the whole community to enjoy.
- Improved accessibility and new links through the site, including opening up River Rom.
- A new primary school for local children.
- A new healthcare facility to help address local demand.
- High-quality business space, including affordable workspace to support local small to medium-sized companies or start-ups.
- A new community centre, including new space for the Havering Islamic Cultural Centre.
- Local employment opportunities.
- High-quality design and placemaking will be supported by long term estate management.

Masterplan for Bridge Close
The emerging mixed-use proposals will be delivered across the site in blocks which will be designed to fit with the evolving townscape of Romford Town Centre. The proposed building heights range from 6 to 14 storeys.

Building heights vary to create good space standards whilst taking into account views from around the site. Orientation and heights of buildings have been carefully considered to ensure high-quality public spaces are created between buildings.



CGI view of looking south along the River Rom

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Bridge Close
Romford

Community benefits



CGI view of the new school and health centre

In addition to providing new homes, commercial space and public open spaces, the proposals will also deliver much-needed services for Romford residents.

This will help to meet the need for new school places, provide a healthcare facility and support Romford's thriving community through the creation of new community facilities.

In addition, the proposals would secure significant planning contributions to support wider improvements to community infrastructure in Romford.

Deliver new affordable homes in Romford
A mix of private and affordable homes will be provided on site, aiming to meet a variety of housing needs and sizes.

What is affordable housing?
Affordable housing is an umbrella term for any home that is not sold or purchased as private market housing or privately rented, and is provided to specific households who meet the target requirements.

We are proposing to provide a mix of affordable housing tenures as part of the development:

- Affordable rent – Up to 80% of market rate or managed by a housing association.
- Shared ownership – Purchase a share of a property and rent the remainder from housing association, with the option to buy more in the future.

Healthcare
New healthcare facility including GP amenities, mental health services and a pharmacy

Primary school
Three form entry primary school with 630 school places, including additional specialist facilities for children with Special Educational Needs and Disabilities (SEND)

Nursery
Nursery with 52 places providing early childhood education

Community hub
High quality community hub for Romford, including improved facilities for Havering Islamic Cultural Centre

Bridge
New bridge across the River Rom to improve connectivity and links with the town centre.

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Bridge Close
Romford

Public realm and street scene



CGI view of the new street and public realm

The proposals will create a range of streets and public spaces that seamlessly link and provide improved accessibility through the site.

Spaces will be safe and welcoming, creating a high quality environment for residents and neighbouring communities to enjoy.

The landscape proposals will deliver:
- Significant areas of green open space.
- New children's play areas.
- A trim trail and informal running loop.
- Substantial areas of tree planting.
- Environmental improvements to Waterloo Road.
- An increase in biodiversity and habitat areas for wildlife.
- New pedestrian and cycle links across the River Rom and Waterloo Road.



Indicative image of public space



Indicative image of public space



Indicative image of public space

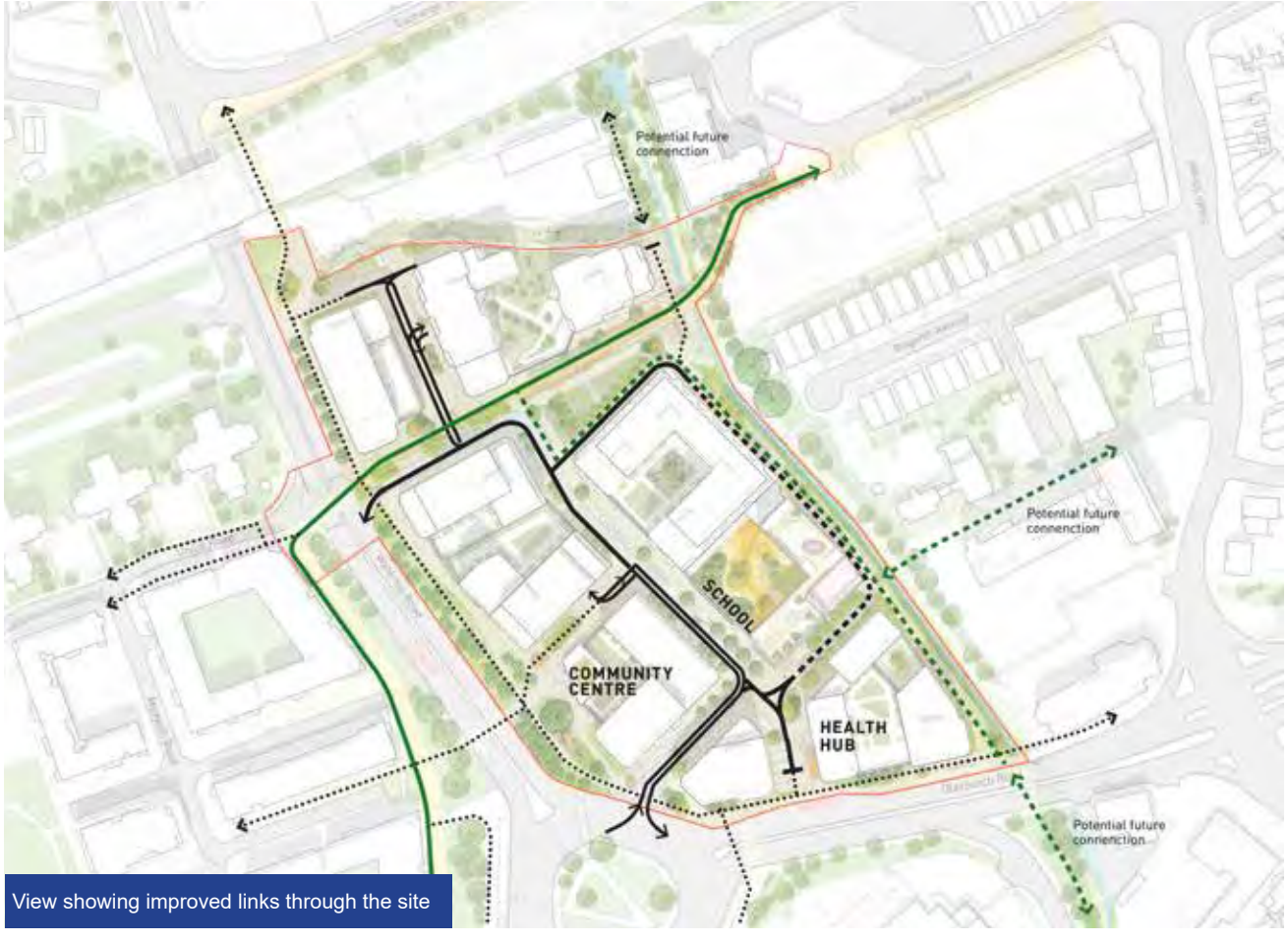
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Bridge Close
Romford

New and improved links



View showing improved links through the site

The site currently suffers from poor accessibility as it is constrained by the ring road, railway line and river. The plans will open up new links and create a gateway into the town centre.

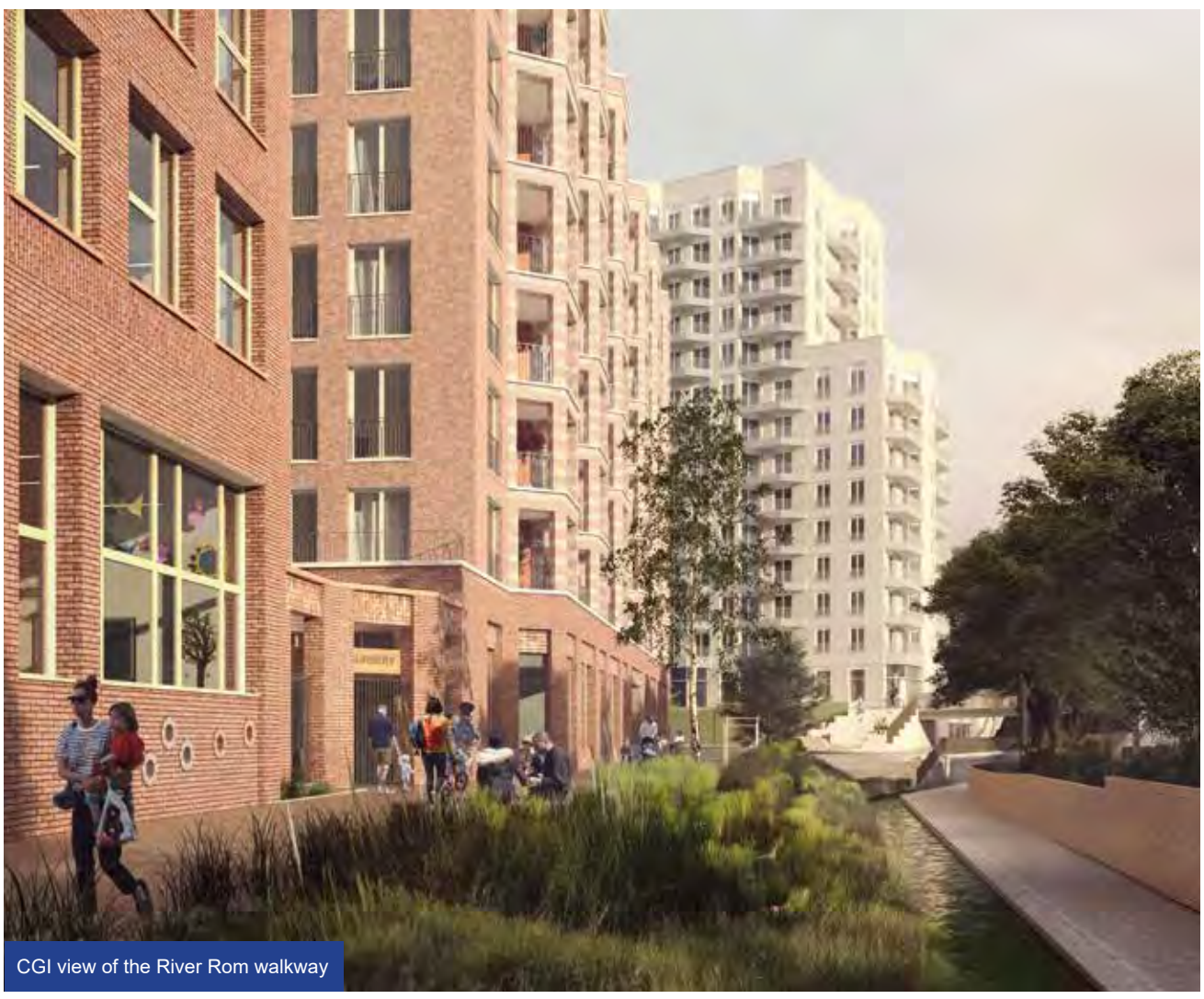
The new east-west link, across the River Rom through to Waterloo Road, will provide quicker and safer access to Romford Station and the town centre.

The site's town centre location benefits from excellent public transport connections. A travel plan will enable new residents, workers and visitors to conveniently use these excellent public transport links and sustainable forms of transport.

The site has a Public Transport Accessibility Level (PTAL) rating of 6a - the second highest rating. PTAL is a measure which rates locations by distance from frequent public transport services.

Bridge Close
Romford

Revitalising the River Rom



CGI view of the River Rom walkway

The proposals will provide a new pedestrian and cycle bridge over the River Rom, transforming the area into an open, attractive and active public space.

The current bridge over the river is underused and feels unsafe to many residents. By building a new bridge to Romford railway station and improving the surrounding area, it will become a livelier and safer connection for everyone in Romford to use.

The stretch of the River Rom within the site is a hidden and underutilised asset in the town centre. It will become a vibrant public space with new walkways, planting and seating.

The green linear park along this stretch of the river will promote health and wellbeing by providing active spaces for people to exercise and relax.



Examples of high-quality riverside public space



Examples of high-quality riverside public space

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LONDON BOROUGH

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Bridge Close Romford

Jobs for Romford



CGI view of the new public square

The proposals will be a catalyst for Romford Town Centre, helping to drive up footfall for existing businesses and boost the local economy.

Workspaces for a range of businesses, including affordable spaces, will help Romford's smaller businesses and start-ups flourish in a sustainable town centre location.

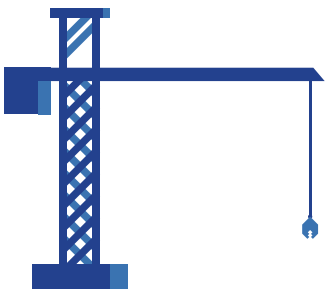
We anticipate that the proposed business and commercial space could support a significant number of local employment opportunities, alongside jobs created at the new primary school and healthcare facility.

Employment opportunities during construction
During the construction phase our contractors will provide employment and training opportunities for the local community, as well as apprenticeships.

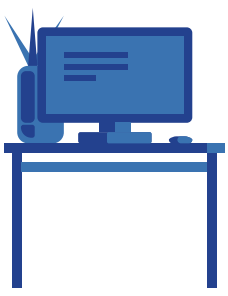
We will also work with our contractors to support Romford's economy by promoting a local procurement strategy, which means we will aim to use local suppliers of materials, specialist tradespeople and workers wherever possible.



The Mayor of Havering and Leader of the Council with local apprentices



205
Construction jobs created per year



Affordable
workspace



650
Direct and indirect local jobs created



£4m
Generated in local spend from new residents and businesses

Havering LONDON BOROUGH

FIRST BASE

www.bridgecloseromford.com

Bridge Close
Romford

Inclusive community engagement

Thank you for visiting today.

Please take the time to complete a feedback form before you leave to let us know your views on the emerging proposals for Bridge Close.

You can take a feedback form away and return it by Freepost, or fill one out online.

All of the information displayed at this event will be available to view online from 16th September 2019.

If you would like to find out more about our proposals, please do not hesitate to get in contact with us or register online for email updates.

Next steps

The overall masterplan will be delivered in phases. Subject to planning consent, we anticipate that construction of the first phase will begin in 2021 and the overall development is expected to take up to 10 years.

Project timeline

September 2018
Stage 1 of public consultation

November 2018
Stage 2 of public consultation

May 2019
Stage 3 of public consultation

September 2019
Stage 4 of public consultation

Autumn 2019
Submission of a planning application

2021
Anticipated date for works to start on site

In May you told us	Our commitment
54% support affordable workspace and cafes	To provide affordable workspace for Romford's small businesses and creative start-ups.
75% support new community facilities	To deliver a range of community amenities for current and future residents to use and enjoy, including healthcare, a primary school and a new space for the Havering Islamic Cultural Centre.
59% in favour of revitalising the River Rom	To transform a stretch of the River Rom, deliver significant environmental improvements and create new public spaces
66% support new links	To create a new east-west link, providing quicker and safer pedestrian access.
55% support a range of new homes	To deliver around 1,070 new homes in Romford Town Centre including affordable homes.

Bridge Close
Romford

YOUR FEEDBACK: PROPOSALS FOR BRIDGE CLOSE, ROMFORD

Name: _____

Address: _____

_____

Postcode: _____ Telephone: _____

Email: _____

1. Please indicate which of the following apply to you (please tick all that apply):

☐ I live locally ☐ I work locally ☐ I am a member of a local group.

Please specify: _____

2. Please indicate your level of support for the following aspects of the proposals:

	Strongly support	Support	Neutral	Do not support	Strongly do not support
A new primary school					
New homes for Romford, including a range of affordable homes					
Healthcare centre					
Community centre					
Opening-up the River Rom as a new public space					
A new east-west link to provide quicker access to Romford town centre					
A range of commercial spaces, including affordable workspace and cafés					

3. Did you attend one of our last public exhibition events at The Brewery or the Havering Islamic Cultural Centre?

☐ Yes ☐ No

4. Having viewed these proposals, do you support the emerging plans for Bridge Close?

☐ Yes ☐ No ☐ Neutral ☐ Undecided

Please explain the reason for your answer:

_____

_____

Bridge Close
Romford

5. What community initiatives or activities would you like to see supported?

6. Are there any local voluntary organisations we should be aware of, for instance working to support local education, skills or environmental initiatives?

7. What are the biggest challenges in your area?

8. Please let us know any other comments you may have at this point:

☐ Please tick if you would like to be kept informed about the planning application (your details will remain confidential and not be passed to any third party)

All data received will be processed by Cascade Communications on behalf of First Base. All data will be kept in accordance with relevant data protection legislation including the General Data Protection Regulations (GDPR). Contact information will only be used to update neighbours on information relating to this project and your data will be kept for no longer than two years. Feedback will be reviewed by First Base and their consultants and an anonymised summary will be submitted to the London Borough of Havering as part of the planning application. Further details can be found in our privacy statement. Please contact us for details.

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26 Noel Street,
London,
W1F 8GY

Email: consultation@cascadepr.co.uk
Telephone: 020 7871 3565

Bridge Close Regeneration
Romford

Welcome


Site outline

Welcome to the fifth stage of public consultation on the emerging proposals for Bridge Close in Romford Town Centre.

Following an extensive and wide-ranging process of public consultation over the last four years, we are now at the final stages ahead of submitting a planning application, and would like to share an update on our proposals to deliver a high-quality, mixed use development, which will provide new homes including much needed affordable housing.

Vision
Our vision seeks to complement Romford's existing offer by delivering:

- A new neighbourhood where people can live, work and play.
- A new primary school, nursery and healthcare facility to support both existing and future residents.
- Community and business space.
- New bridge and links to open up the town centre, simultaneously revitalising a stretch of the River Rom and connecting existing neighbourhoods to the town centre and Queen's Hospital.
- Around 1,070 new homes, including affordable homes, to meet a range of housing needs.

Please feel free to browse the information in your own time, ask the team any questions and share your ideas. We would be grateful if you could take the time to complete a feedback form and provide us with your views.

All information on display today will be available on the project website - www.havering.gov.uk/bridgeclose - from 31st October 2022.

Key themes from previous public consultation events:

- Support for the regeneration of the site.
- Support for the provision of new schools and health facilities in Romford.
- Questions relating to the types and sizes of new homes.
- Support for the delivery of new homes in Romford.
- Support for improved permeability of the site and opening the River Rom frontage.
- Questions surrounding parking and transport around the site.
- Comments regarding the height and massing of the development.

Four
stages of public consultation

1,600+
residents engaged at public events

23,000
letters and **50,000** emails to publicise the events

96,000
residents viewed social media posts

11,000
questions answered by voters online

24
hours of face-to-face engagement


Previous public consultation events

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LONDON BOROUGH

www.havering.gov.uk/bridgeclose

Bridge Close Regeneration
Romford

About us

Havering Council
Havering Council, through its development company, Bridge Close Regeneration LLP, is working to redevelop Bridge Close Industrial Estate to create a high-quality, mixed-use development, which will provide new homes for local people including much needed affordable housing, a school, health services, and jobs, as well as open up the River Rom to make it a key part of the town.

There is a demand for additional housing in the borough, particularly in a location that is close to excellent public transport connections, shopping and leisure facilities. Bridge Close was allocated as a key site for residential development in the Romford Area Action Plan 2008 and this was also reflected in the Romford Redevelopment Framework agreed by Havering Council's Cabinet in July 2015.

At the June 2016 Cabinet meeting, Havering Council agreed that Bridge Close could be taken forward for redevelopment. The plans that will be delivered following consultation with residents and stakeholders will create homes, commercial space and a new bridge to allow quick access to Romford station and Queen's Hospital.





New Green, Rainham (formerly Napier and New Plymouth House), Havering Council

An award-winning design team
A first-class design team, with a track record of delivering exemplary schemes across London and the UK, has been appointed to bring forward the proposals.

Fletcher Priest are the masterplanners for the project. Maccreanor Lavington and Allies and Morrison will be designing the buildings and spaces for the first phase of the proposed development.

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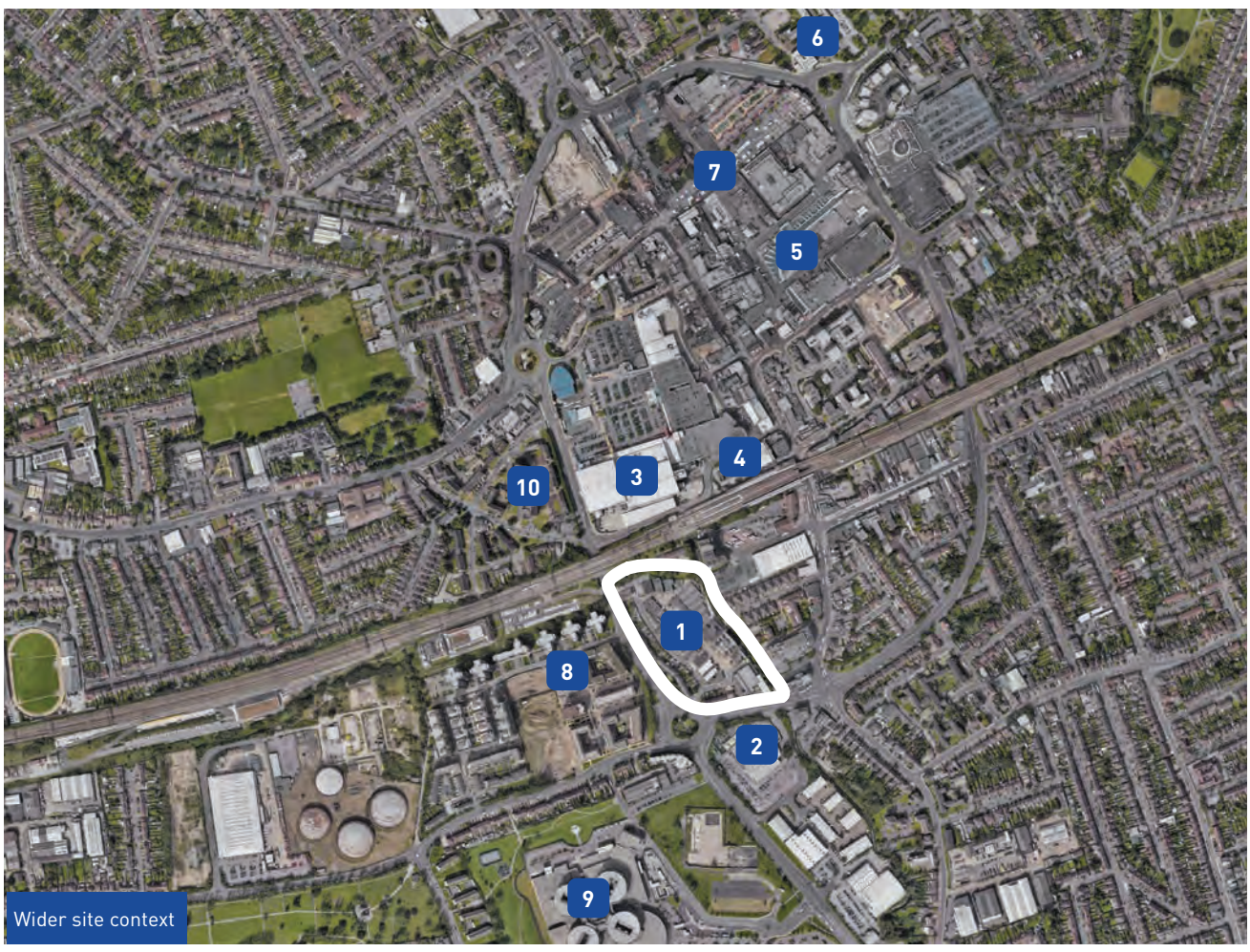
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Havering
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www.havering.gov.uk/bridgeclose

Bridge Close Regeneration
Romford

The site



Wider site context

Key: Local context

1 Bridge Close	2 Homebase	3 The Brewery	4 Romford Train Station
5 The Liberty Shopping Centre	6 The Town Hall	7 Market Place	8 Oldchurch Rise/ Reflections
9 Queen's Hospital	10 Waterloo Estate		

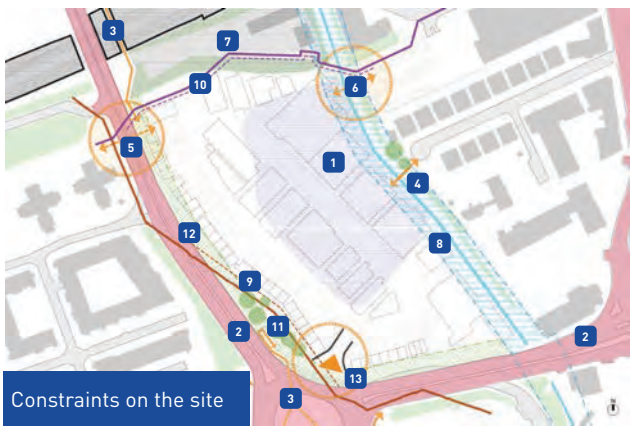
The Bridge Close Industrial Estate is located at the junction of Waterloo Road and Oldchurch Road in Romford. The industrial estate is bordered by residential properties on Waterloo Road and Oldchurch Road.

The River Rom runs through the industrial estate, however it is hidden, unusable and subject to fly tipping.

The site is an important part of the plans to regenerate central Romford and provide much-needed new infrastructure and homes.

Bridge Close provides the opportunity to provide a new high-quality place-led part of Romford where people can live, work and play.

Opportunities
The site benefits from an excellent town centre location and has the potential to:
- Create new connections to the town centre and Queen's Hospital.
- Revitalise a hidden and neglected stretch of the River Rom.
- Deliver new homes, including much needed affordable housing, in a sustainable location which benefits from first-class public transport links.
- Deliver a new primary school for local children and new healthcare facilities.
- Deliver long-term investment by the Council including careful management of the scheme into the future.



Constraints on the site

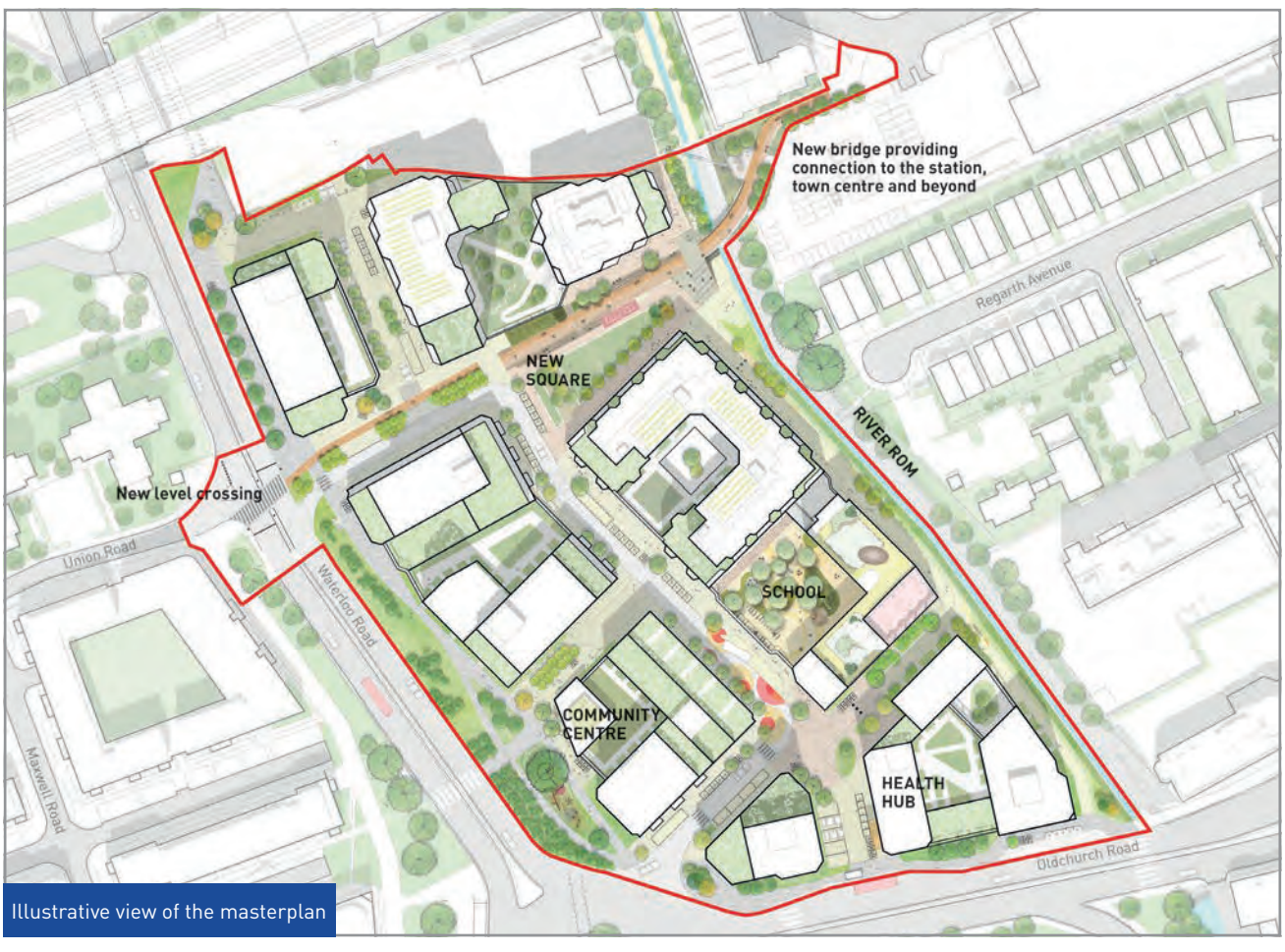
1 Flood risk (Zone 2)
2 Ring road
3 Underpass
4 Existing bridge
5 New crossing location
6 Proposed bridge location
7 Embankment level difference
8 River edge (8m. setback)
9 Thames Water sewer (5m. setback)
10 Gas main 3m. setback
11 Existing mature trees
12 Level change around the site
13 Existing access from roundabout

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Bridge Close Regeneration
Romford

Creating a neighbourhood



Illustrative view of the masterplan

The redevelopment of Bridge Close will set a benchmark for future development in Romford.

In line with the Council's ambition for Romford, the plans will create a safe, active and inviting neighbourhood which complements Romford Town Centre by delivering:

- A new neighbourhood where people can live, work and play.
- Community and business space.
- New bridge and links to open up the town centre, simultaneously revitalising a stretch of the River Rom and connecting existing neighbourhoods to the town centre and Queen's Hospital.
- Around 1,070 new homes, including affordable homes, to meet a range of housing needs.
- A new primary school, nursery and healthcare facility to support both existing and future residents.

Masterplan for Bridge Close
The emerging mixed-use proposals will be delivered across the site in blocks which will be designed to fit with the evolving townscape of Romford Town Centre. The proposed building heights range from 5 to 14 storeys.

Building heights vary to create good space standards whilst taking account of views from around the site. Orientation and heights of buildings have been carefully considered to ensure high-quality public spaces are created between buildings.


View looking south along the River Rom

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Bridge Close Regeneration
Romford

Delivering improvements to local infrastructure



View showing the new school

In addition to providing new homes, commercial space and public open spaces, the proposals will also deliver much-needed services for Romford residents.

This will help to meet the need for new school places, provide a healthcare facility and support Romford's thriving community through the creation of new community facilities.

The proposals will deliver:

- A new large healthcare facility that could provide a range of facilities from GP services to mental health services and a pharmacy.
- A three-form entry primary school as part of the first phase with 630 school places for local children, including additional specialist facilities for children with Special Educational Needs and Disabilities (SEND).
- A nursery with 39 places providing early childhood education.
- A high-quality community hub for Romford.
- A new bridge across the River Rom to improve connectivity and links with the town centre, as well as improvements to the existing bridge which links to Regarth Avenue.

In addition, the proposals would secure significant planning contributions to support wider improvements to community infrastructure in Romford.

Healthcare
New healthcare facility including GP amenities, mental health services and a pharmacy

Primary school
Three form entry primary school with 630 school places, including additional specialist facilities for children with Special Educational Needs and Disabilities (SEND)

Nursery
Nursery with 39 places providing early childhood education

Community hub
High quality community hub for Romford

Bridge
New bridge across the River Rom to improve connectivity and links with the town centre

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Bridge Close Regeneration
Romford

Public realm and street scene



View showing the new public square

The proposals will create a range of streets and public spaces that seamlessly link and provide improved accessibility through the site.

Spaces will be safe and welcoming, creating a high-quality environment for residents and neighbouring communities to enjoy.

The landscape proposals will deliver:
- Significant areas of green open space.
- New children's play areas.
- A trim trail and informal running loop.
- Substantial areas of tree planting.
- Environmental improvements to Waterloo Road.
- An increase in biodiversity and habitat areas for wildlife.
- New pedestrian and cycle links across the River Rom and Waterloo Road.



Indicative image of public space



Indicative image of public space



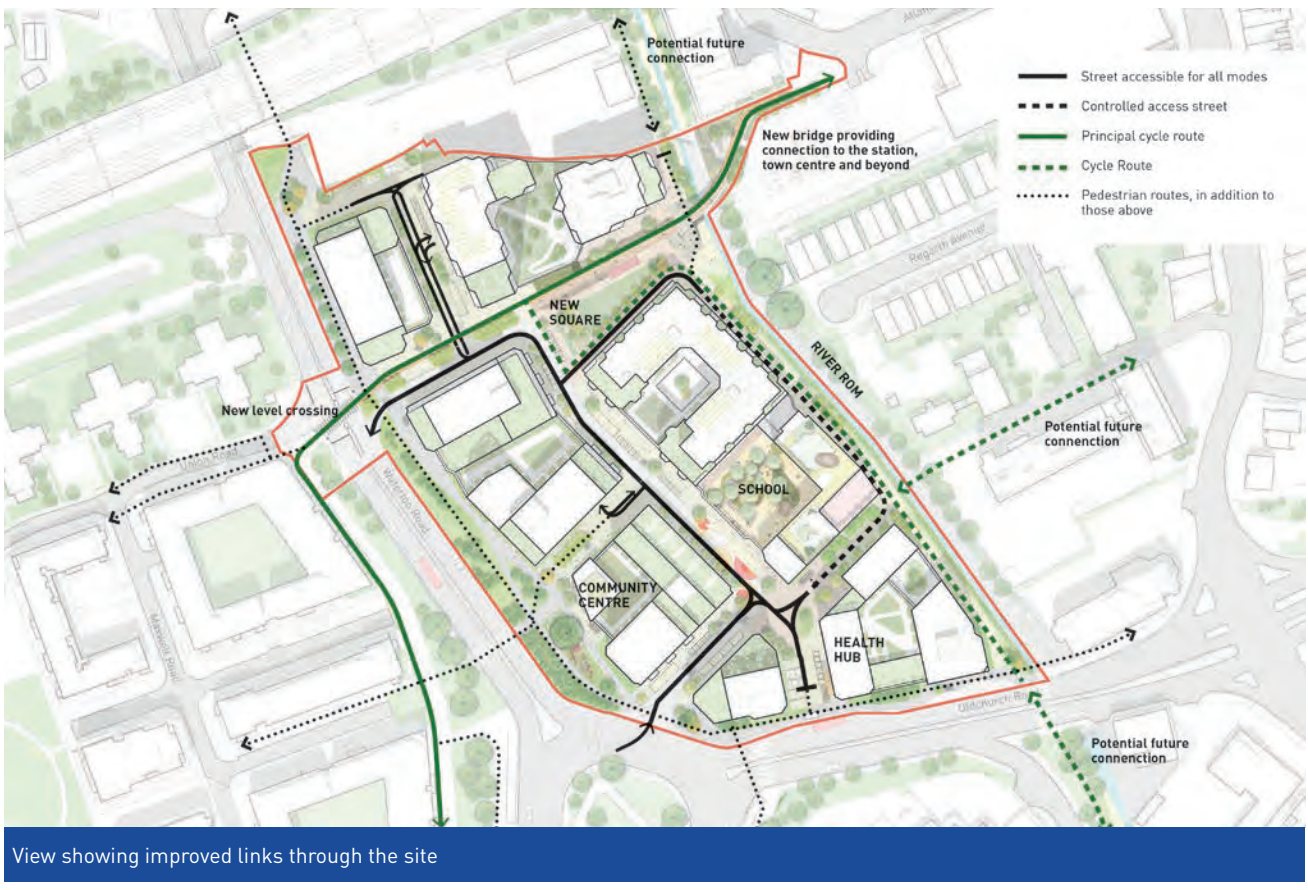
Indicative image of public space

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Bridge Close Regeneration
Romford

New and improved links



View showing improved links through the site

The site currently suffers from poor accessibility as it is constrained by the ring road, railway line and river. The plans will open up new links and create a gateway into the town centre.

The new east-west link, across the River Rom through to Waterloo Road, will provide quicker and safer access to Romford Station and the town centre.

The site's town centre location benefits from excellent public transport connections. A travel plan will enable new residents, workers and visitors to conveniently use these excellent public transport links and sustainable forms of transport.

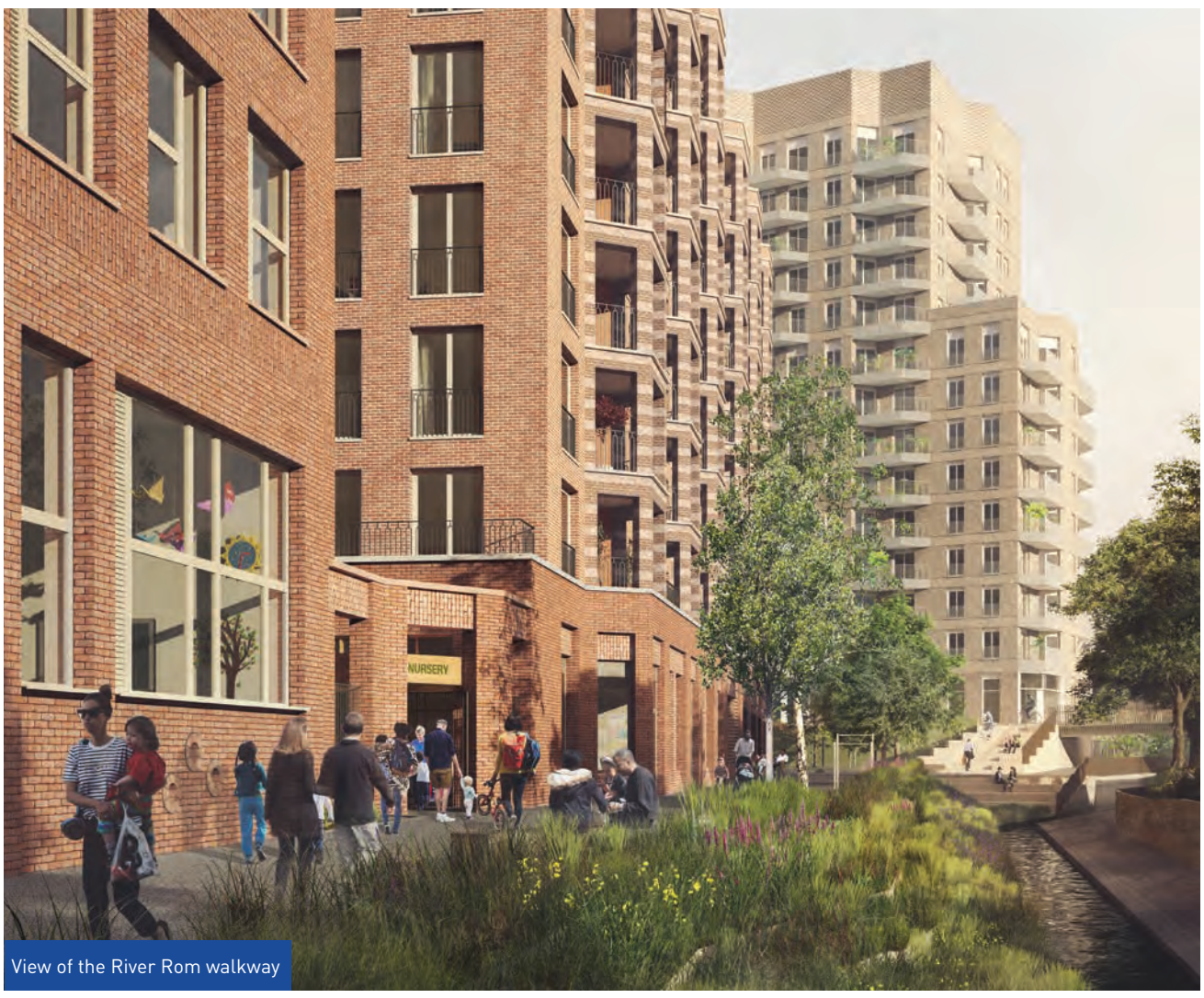
The site has a Public Transport Accessibility Level (PTAL) rating of 6a - the second highest rating. PTAL is a measure which rates locations by distance from frequent public transport services.

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Bridge Close Regeneration
Romford

Revitalising the River Rom



View of the River Rom walkway

The proposals will provide a new pedestrian and cycle bridge over the River Rom, transforming the area into an open, attractive and active public space.

The current bridge over the river is underused and feels unsafe to many residents. By building a new bridge to Romford railway station and improving the surrounding area, it will become a livelier and safer connection for everyone in Romford to use.

The stretch of the River Rom within the site is a hidden and underutilised asset in the town centre. It will become a vibrant public space with new walkways, planting and seating.

The green linear park along this stretch of the river will promote health and wellbeing by providing active spaces for people to exercise and relax.


Examples of high-quality riverside public space


Examples of high-quality riverside public space

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Bridge Close Regeneration
Romford

Jobs for Romford



View showing the new public square

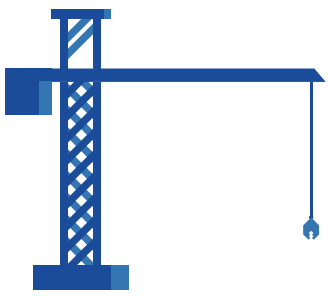
The proposals will be a catalyst for Romford Town Centre, helping to drive up footfall for existing businesses and boost the local economy.

Workspaces for a range of businesses, including affordable spaces, will help Romford's smaller businesses and start-ups to flourish in a sustainable town centre location.

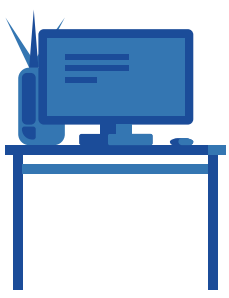
We anticipate that the proposed business and commercial space could support a significant number of local employment opportunities, alongside jobs created at the new primary school and healthcare facility.

Employment opportunities during construction
During the construction phase our contractors will provide employment and training opportunities for the local community, as well as apprenticeships.

We will also work with our contractors to support Romford's economy by promoting a local procurement strategy, which means we will aim to use local suppliers of materials, specialist tradespeople and workers wherever possible.



205
construction jobs created per year



Affordable
workspace



650
direct and indirect local jobs created



£4m
generated in local spend from new residents and businesses

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Bridge Close Regeneration
Romford

Sustainability for today and the future



New high quality homes and community facilities

A site-wide sustainability strategy has been developed to ensure the development achieves a high level of environmental and social sustainability performance. This includes the new homes which will be energy and water efficient with an aspiration to perform better than Building Regulation requirements.

Workspaces for a range of businesses, including affordable spaces, will help Romford's smaller businesses and start-ups to flourish in a sustainable town centre location.

We anticipate that the proposed business and commercial space could support a significant number of local employment opportunities, alongside jobs created at the new primary school and healthcare facility.

- Optimising the use of a brownfield site in a highly sustainable town centre site with excellent public transport accessibility.
- Ecological enhancements with a site-wide net gain in biodiversity and urban greening meeting the 0.4 London Plan target.
- All buildings will adopt a fabric-first approach reducing energy demands to achieve a target 10% and 15% CO_2 emission reduction.
- Heating will be supplied via a site-wide energy centre (located within Plot A1) which will use air source heat pumps as the primary heat source. All domestic and non-domestic units will connect to this system.
- Each block will contain a plant room which will contain water source heat pumps.
- Photovoltaic Panels, known as PV panels, will be installed on suitable available roof space to provide on-site renewable energy generation.
- The energy strategy aims to achieve a 35% reduction in CO_2 emissions. A carbon offset payment will be identified to offset the remaining carbon to achieve a net zero carbon scheme.

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Bridge Close Regeneration
Romford

Next steps

Thank you for visiting today

Please take the time to complete a feedback form before you leave to let us know your views on the proposals for Bridge Close. You can take a feedback form away and return it by Freepost or fill one out online.

All the information displayed at this event will be available to view on our website from Monday 31st October and you can also register for updates to keep up to date with our proposals.

If you would like to find out more about our proposals, please do not hesitate to get in contact with us or register online for email updates.

Next steps

Havering Council is committed to engaging with the local community. Following this stage of consultation, we are expecting to hold a further consultation in the early summer.

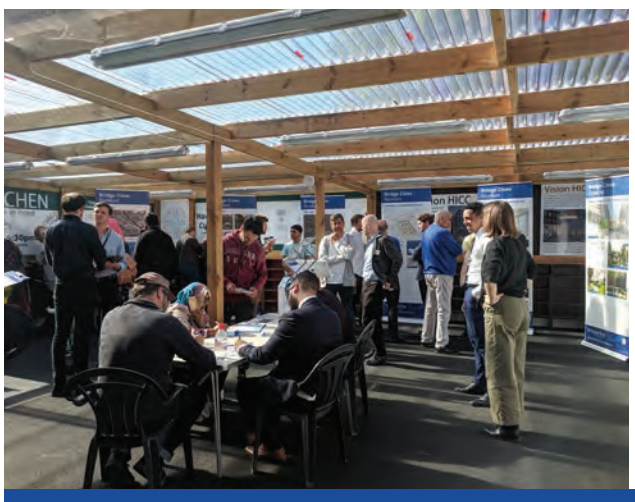
The overall masterplan will be delivered in phases. Subject to planning permission, we expect to start on site with the first phase of construction in Summer 2024, with all new homes being delivered by 2030.

Delivering the Bridge Close masterplan

The masterplan will be delivered using a phased approach, with the outline plans for the overall site being submitted later this year alongside detailed plans for the first phase.

The first phase of development will include:
- Around 400 homes, including affordable homes.
- Commercial space for businesses.
- The three-form entry primary school, with nursery and SEND provision.
- Improvements to River Rom.
- East-West connection to the town centre:
  - A new pedestrian/cycle bridge over River Rom and;
  - A signalised crossing over Waterloo Road
- The new bridge and crossing over Waterloo Road to create the east-west connection.
- The new public square and associated landscaping.







Previous public consultation events

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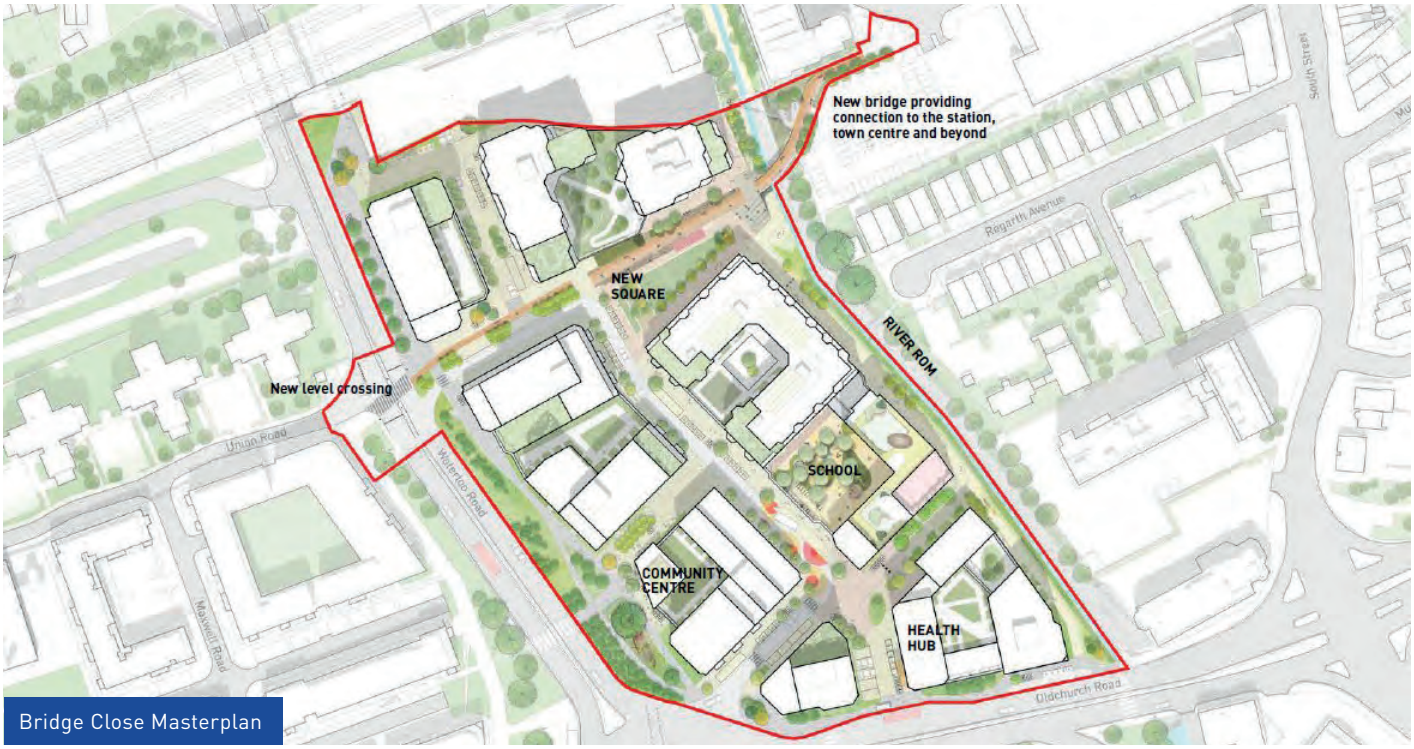
www.havering.gov.uk/bridgeclose

Bridge Close Regeneration
Romford

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October 2022

Bridge Close Industrial Estate update



Bridge Close Masterplan

Dear Resident,

We are writing to provide you with an update on the next stage of the redevelopment proposals for Bridge Close Industrial Estate in Romford.

As you may know, Havering Council, through its development vehicle, Bridge Close Regeneration LLP, is working to redevelop Bridge Close Industrial Estate to bring forward a high-quality, mixed-use development, which will provide new homes including much-needed affordable housing, a school, health services, and jobs, as well as open up the River Rom to make it a key part of the town.

Following an extensive and wide-ranging process of public consultation over the last four years, we are now at the final stages ahead of submitting a planning application, and would like to invite you to a series of exhibition events, hosted by Cascade Communications who are coordinating the consultations on behalf of the council, to provide you with an update on the proposals.

The public exhibition events are as follows:

In person:
Wednesday 26 October • 11am – 2pm
Saturday 29 October • 12pm – 3pm

At **The Brewery Romford, downstairs outside the Sainsburys, Brewery Walk, Romford, Essex, RM1 1AU**

Online webinar:
Thursday 27 October • 6pm – 7pm
To register for the online webinar, please visit **www.havering.gov.uk/bridgeclose** or **scan the QR Code here**.

Contact us:
consultation@cascadecommmunications.co.uk • 020 7871 3564

English: Get in touch if you would like this translated in your language.
Lithuanian: Susisiekite, jei norite, kad tai bÐtÐ išversta Ð jÐsÐ kalbÐ.
Polish: Skontaktuj siÐ z nami, jeÐli chcesz to przettumaczyÐ na Twój jÐzyk.
Punjabi: ਜੇਕਰ ਤੁਸੀਂ ਇਸਨੂੰ ਆਪਣੀ ਭਾਸ਼ਾ ਵਿੱਚ ਅਨੁਵਾਦ ਕਰਨਾ ਚਾਹੁੰਦੇ ਹੋ ਤਾਂ ਸੰਪਰਕ ਕਰੋ।
Bengali: আপনি যদি এটি আপনার ভাষায় অনুবাদ করতে চান তাহলে যোগাযোগ করুন।
Filipino: Makipag-ugnayan kung gusto mong isalin ito sa inyong wika.

Vision

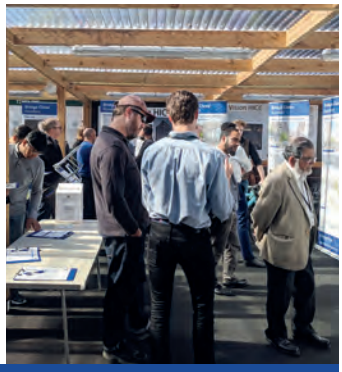


A new school

Our vision for Bridge Close seeks to complement Romford's existing offer by delivering:

- A new neighbourhood where people can live, work and play.
- Community and business space.
- New bridge and links to open up the town centre, simultaneously revitalising a stretch of the River Rom and connecting existing neighbourhoods to the town centre and Queen's Hospital.
- Around 1,070 new homes, including affordable homes, to meet a range of housing needs.
- A new primary school, nursery and healthcare facility to support both existing and future residents.





Photos from previous consultation events

Our journey so far over the past four years has meant:

Four stages of public consultation

96,000 residents viewed social media posts

1,600+ residents engaged at public events

11,000 questions answered by voters online

23,000 letters and **50,000** emails to publicise the events

24 hours of face-to-face engagement

We want to hear from you

Our Freepost survey below can be returned by filling in, tearing off and sealing the questionnaire. Then just drop it in the post!

If you are not able to attend any of the consultation events, please feel free to fill this questionnaire and send it back to us.

ABOUT YOU

Name

Address

Email address

Phone number

Age group

☐ Under 18 ☐ 19-24 ☐ 25-34 ☐ 35-44 ☐ 45-54 ☐ 55-64 ☐ 65+ ☐ Prefer not to say

How would you describe your gender?

☐ Male (including transgender men) ☐ Female (including transgender women)

☐ Prefer to self-describe as _____ (non-binary, gender-fluid, agender, please specify) ☐ Prefer not to say

Please tick all that apply from the following:

☐ I live locally ☐ I work locally ☐ I belong to a local group (please specify)

Did you attend any of our last public exhibition events at The Brewery or the Havering Islamic Cultural Centre?

☐ Yes ☐ No

We are making improvements to public spaces, landscaping and connectivity in the town centre including revitalising River Rom. What are your thoughts and ideas for how we can further improve the public realm?

Please indicate if you would like to be kept informed on any of the following [tick all that apply]

☐ New homes ☐ Jobs ☐ Apprenticeships ☐ Training ☐ Other

Please let us know any other comments you may have at this point:

I am happy to receive updates on the plans for Bridge Close

☐ Yes ☐ No

Thank you for providing your feedback

All data received will be processed by Cascade Communications, who are appointed by Bridge Close Regeneration LLP, on behalf of our project team and kept in accordance with relevant data protection legislation including the General Data Protection Regulations (GDPR). Your data will be kept for no longer than five years. Contact information will only be used for updates on information relating to the project. Further details can be found in Cascade privacy statement available via **www.cascadecommunications.co.uk.**

Bridge Close Regeneration

Romford

Havering
LONDON BOROUGH

Freepost RUCG-JBYH-TJGZ
Public Consultation (Cascade)
4 Wardour Mews
London
W1F 8AJ



WEEKLY REPORT

Prepared for: First Base
13th May 2019

1,977

Community Users

5,491

Votes Cast

771

Community Voters

Users



- 91% New users
- 9% Returning users

Devices



- 76% Mobile
- 18% Tablet
- 6% Desktop

Poll: Area Improvements

What do you use the town centre for?



Commuting
12% voted
35 votes



Shopping
65% voted
185 votes



Work
7% voted
19 votes



Leisure
16% voted
47 votes

How do you currently travel around Romford?



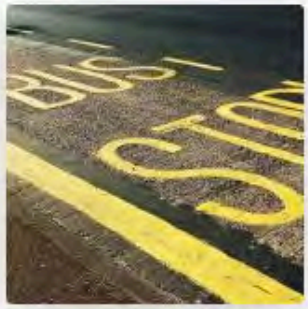
Walk
39% voted
109 votes



Cycle
4% voted
12 votes



Car
31% voted
89 votes



Public transport
26% voted
73 votes

What new facilities does Romford need most?



Cafe
14% voted
38 votes



Healthcare centre
24% voted
65 votes



Leisure eg. Gym
5% voted
14 votes



Local independent shops
57% voted
152 votes

What does Romford need more of?



Community Amenities
59% voted
156 votes



Commercial Space
11% voted
30 votes



Improved Transport Links
10% voted
26 votes



New Jobs
20% voted
54 votes

What challenges do the community need more support with?

Most favourite

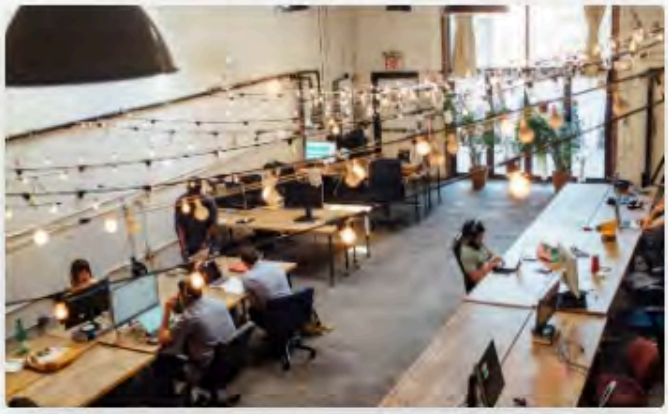
1. Social issues
2. Local business opportunities
3. Pollution & environment
4. Infrastructure

Least favourite

What would you like to see in Bridge Close?



Cafes and restaurants
65% voted
169 votes



Workspaces
35% voted
90 votes

Would you use a new local healthcare centre?



Poll: Bridge Close

How do you feel about opening the River Rom as public space?



How would you prefer to use the space around the River Rom?



Leisure
49% voted
293 votes



Health & Fitness
10% voted
58 votes



Commercial
11% voted
65 votes



Dining
31% voted
188 votes

What would you most like to see in the new river space?





Open Space

25% voted

155 votes



Public Seating

21% voted

127 votes



High Quality Landscaping

54% voted

327 votes

Would you like to see improved connections to the station?



What's most important for you in a community centre?



Education
19% voted
110 votes



Fitness
17% voted
100 votes



Socialising
55% voted
324 votes



Childcare
10% voted
59 votes

What would you like to see in the new workspace?

Most favourite

1. Creative Workshops
2. Local jobs & Apprenticeships
3. Start-up Incubators
4. Affordable Workspace

Least favourite

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CABINET

10th December 2025

Subject Heading:	Future proposals for former library premises
Cabinet Member:	Councillor Graham Williamson
ELT Lead:	Neil Stubbings, Strategic Director of Place
Report Author and contact details:	Mark Butler, Assistant Director of Regeneration & Place Shaping mark.butler@havering.gov.uk 01708 432947
Policy context:	The proposals in this paper align with the objectives within the Asset Management Plan, to keep the use of assets under ongoing review and to promote the release of assets when no longer required for operation use.
Financial summary:	Capital approval of £230,000 is sought to demolish two of the existing library buildings. This expenditure will defray interim costs and will be recovered in the medium term in the form of reduced development costs achieved from a cleared site.
Is this a Key Decision?	Yes - significant effect on two or more Wards
When should this matter be reviewed?	November 2026
Reviewing OSC:	Place 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	
Place - A great place to live, work and enjoy	x
Resources - Enabling a resident-focused and resilient Council	x

SUMMARY

Following the Cabinet decision in February 2025 to close three branch libraries as part of the wider budget-savings requirements, this report summarises subsequent actions and proposals for each site emerging from the Asset Review process, with relevant approvals sought, as appropriate, in each case.

RECOMMENDATIONS

Cabinet are asked to:

- Approve in principle the re-purposing of the former Gidea Park Library site for the development of a 6-person accommodation facility for children with disabilities, subject to a separate business case being submitted by the Director of Starting Well.

- Endorse a request for capital expenditure in the sum of £120,000 and approve the submission of any related planning application for the demolition of the former library building at Gidea Park, to provide a cleared site.

- Note the ongoing evaluation of the proposal received from the Harold Wood Foundation in respect of use of the former Harold Wood library premises.

- Agree to the disposal of the former South Hornchurch library site, as identified in Appendix A, at a value representing the best consideration reasonably obtainable to the Council.

- Endorse a request for capital expenditure in the sum of £110,000 and approve the submission of any related planning application for the demolition of the former library building at South Hornchurch – the final decision to demolish will be subject to the evaluation of offers received following marketing of the site and premises.

- Delegate authority to the Assistant Director of Regeneration & Place Shaping, in consultation with the Deputy Director of Legal and Democratic Services to conduct all appropriate steps to progress and conclude the asset disposals in a manner that satisfies all legal/regulatory requirements. This delegation to include any appropriation of the assets for planning purposes.

REPORT DETAIL

1. At its meeting on 5th February 2025, Cabinet:
   - Agreed the closure of the following three branch libraries with effect from 1st April 2025:
     - Gidea Park
     - Harold Wood
     - South Hornchurch

   - Agreed that the three branch libraries would be mothballed from 1 April 2025 and delegated to the Strategic Director of Place the authority to use the branch library buildings for any appropriate meanwhile use, provided that any proposals for the disposal or long term use of the branch libraries be brought to a future Cabinet meeting

2. All three libraries duly closed at the end of March, following which books were re-distributed and to remaining 7 libraries and equipment/fittings removed over the subsequent weeks. Temporary relief from business rates was granted for the first three months following closure, expiring at the beginning of July 2025.

3. Future options for the three library sites have been considered by officers and Cabinet Members under the Area-Based Asset Review process. A summary of each is set out below

Gidea Park library

4. The former Gidea Park library premises occupy a site of 0.29 acres (0.118 ha), located on Balgores Lane, immediately adjacent to forthcoming Balgores Special School, which is due to be developed and available for the first intake of pupils in August 2027. A site plan is provided in Appendix A

5. Whilst disposal of the site to generate a capital receipt has been considered, the Asset Review process has identified that the site might be more favourably developed to accommodate a 6-person accommodation facility for children with disabilities, satisfying a specific need identified by the Starting Well team.

6. An initial feasibility study has already been commissioned from the same architects developing detailed proposals for the Balgores School, ensuring a holistic design approach for both projects. The accommodation proposal is currently the subject to a capital funding bid to NHS-E and it is understood that their regional team are supporting the bid in principle, prior to consideration by the NHS-E national team – the result of the funding bid will be known in early 2026.

7. A separate, detailed business case for the proposal, including capital cost projections and funding proposals, will be brought forward to Cabinet by the

Starting Well service, but initial financial projections suggest that the facility could achieve significant annual cost savings when compared with current expenditure incurred across care, accommodation and transport for out-of-borough provision.

8. Interim use of the former library building by the contractors appointed for the Balgores School development has been considered, but their requirement for the premises would result in the building standing empty for some time prior to their use.

9. In order to mitigate building risks and associated costs in the interim, it is proposed to demolish the existing library, the capital cost of which will effectively represent a saving against the subsequent development cost of the accommodation proposal, which can be costed and progressed in due course with a cleared site. Work on the 6-person facility is projected to commence in August 2026, following external funding and planning approval, with the aim that the premises will be ready for occupation by August 2027.

10. Cost estimates have been sought for the demolition work and Cabinet are asked to endorse a request for a capital allocation in the sum of £120,000 for this purpose.

Harold Wood library

11. The former Harold Wood library premises occupy a site of 0.32 acres (0.132 ha), located on the junction of Station Road, Avenue Road and Arundel Road. A site plan is provided in Appendix A.

12. An interim use proposal from the Harold Wood Foundation (a community-based charity) is currently being considered, proposing a series of community-based initiatives that could potentially be delivered with the support of a variety of partners. The plan is still formative at this stage and is the subject of further evaluation to determine financial viability and other aspects. The proposal envisages a lease being granted by the Council and details of rental value have been supplied to the Foundation for the purpose of their business case

13. In the meantime, the Foundation has successfully applied to register the former library building as an Asset of Community Value (ACV) under the Localism Act 2011. The Council has confirmed that the application satisfies the relevant criteria with the result that the community has the right the right to be informed of a decision to sell the asset, has six weeks following notification to decide if it wishes to bid, and a further six months to prepare a bid.

14. The Asset Review process conducted between council officers and Cabinet Members identified a preference towards pursuing a redevelopment of the former library site for housing, ideally by the Council or its housing company, Mercury Land Holdings, in preference to disposal to a third party. The existing war memorial would be retained in the event of any redevelopment. In light of

the ACV registration referenced above, a community bid for the site will need to be considered in the event of a redevelopment proposal involving a disposal of the asset.

15. The Friends of Harold Wood Library group was established in response to the library consultation exercise undertaken by the Council in summer 2024. The community engagement team continue to liaise with the group regarding any emerging proposals for the building.

South Hornchurch Library

16. The South Hornchurch Library site is located on the A125 Rainham Road, on a site of 0.4 acres, adjacent to South Hornchurch Community Hall and Fledglings Day Nursery. A site plan is provided in Appendix A.

17. Now surplus to operational requirements, the Asset Review process has identified this site as appropriate for freehold disposal for either for re-purposing the existing building to an alternative use, or for redevelopment, subject to planning.

18. Cabinet Members have also expressed a wish for part of any capital receipt generated from a disposal to be set aside for the purpose of funding improvements to improve community facilities within the adjacent community hall. A separate feasibility study is in progress to consider options and related cost estimates to achieve this, though the final scope and sum to be invested are yet to be determined at this point.

19. Whilst estimates for demolition have been obtained in the order of £110,000 (for the purpose of limiting holding costs pending disposal) it is proposed that marketing of the asset is conducted to identify whether the existing buildings are likely to generate a more favourable offer than the cleared site. Marketing will be undertaken whilst the planning application to demolish the existing buildings is determined. Subject to the receipt of planning permission, a final decision on demolition can be taken once offers for the site/premises have been evaluated.

REASONS AND OPTIONS

Reasons for the decision:

The Council has a fiduciary duty to deal appropriately with assets that have been declared surplus to current operational requirements.

The recommendations within this report seek to address:

- emerging service needs and cost pressures, as is the case with the Gidea Park site, recommended for re-development to serve the priority needs from Starting Well
- the ongoing need to identify opportunities for capital receipts, as is the case with the proposed disposal of the South Hornchurch library site
- statutory obligations, such as the Localism Act 2011, whereby the Council is considering the merits of the meanwhile use proposals and the registration of the former Harold Wood Library premises as an Asset of Community Value, prior to taking any longer term decisions on the asset.

At the same time, the recommendations seek to mitigate any avoidable holding costs in the interim.

Other options considered:

Gidea Park:

- *Disposal of former library site* – disposal of the site would generate a capital receipt that would support the capital strategy. However, as identified within the report, the potential level of cost avoidance achieved through developing a residential facility for children with disabilities is likely to generate a significantly stronger financial business case than a one-off capital receipt. The disposal option is therefore not recommended in this instance.

- *Retention of existing building on site, pending redevelopment* – temporary use by the contractor developing Balgores School has already been dismissed within the report as their accommodation requirement does not arise immediately. The existing building continues to generate a business rates liability, plus other potential financial and security liabilities. An interim use may mitigate these risks to a limited extent, but given the short-term nature is unlikely to attract interest/generate adequate income to cover these costs in full. Taking all factors into consideration, early demolition is considered to be the most pragmatic approach to minimising cost/risks whilst also presenting future savings in redevelopment costs by providing a cleared site.

- *Development of the site for other purposes* – the site could potentially be developed for other residential purposes, but the proposed use a) meets a strategic need, b) offers scope for significant cost avoidance, c) provides potential synergy with the SEND school facility to be developed immediately adjacent

Harold Wood:

- *Demolish the former library premises, as recommended for the former Gidea Park library site* – this action would be inappropriate given the recent registration of the building as an Asset of Community Value.

- *Disposal of the former library site* – whilst this has not been entirely dismissed as a future option, as an Asset of Community Value, the community would be notified of any intention by the Council to dispose of the asset and provided with a 6-month window within which to formulate a bid. The Council is not obliged to accept the community bid, but to consider it alongside any others received for the asset.

South Hornchurch*:*

- *Retention of existing building on site, pending redevelopment* – the existing building continues to generate a business rates liability, plus other potential financial and security liabilities. An interim use may mitigate these risks to a limited extent, but given the short-term nature is unlikely to attract interest/generate adequate income to cover these costs in full. Taking all factors into consideration, the site/premises will be subject to marketing to assess the value of offers received, prior to confirming demolition.

IMPLICATIONS AND RISKS

Financial implications and risks:

Former Gidea Park Library

20. The proposal is to seek in principle approval to demolish the existing building to make way for a future development on the land. The cost of which is earmarked at £120,000 from the capital programme.

    a. The paper identifies a potential development scheme, subject to a future business case, to construct a 6-person accommodation facility for Children with Disabilities. A financial appraisal of this option will be required.

21. It should be noted that there is a reasonable risk that the expenditure, should this go ahead before a business case is considered, will be classed as revenue expense, not capital. This is because the demolition would be more likely linked to the removal of an old asset no longer required. There are no firm plans to develop the site either way at this point. The only argument potentially, would be if demolition increased the value of the site subject to a future disposal decision. However, the current indicative proposal is to not dispose of the site.

22. Should the expenditure be approved, this would require financing most likely from a General Fund reserve. It is noted that demolition would alleviate the need to incur ongoing costs associated with the existing building.

Former Harold Wood Library

23. The current upkeep of the closed building is estimated at £13k per annum.

Former South Hornchurch Library

24. The intention is to seek approval to demolish the existing building, subject to the evaluation of potential offers for the site and premises. This report sets out the potential cost at £110,000, however, the criteria to meet the threshold for capital expenditure would need to be reviewed.

25. Therefore, there is a risk that this may require funding from the revenue budget, where no provision exists, and so funding would be required from an appropriate reserve.

Legal implications and risks:

26. The Council is empowered under several statutory provisions to support the recommendations in this report:

a) The recommendation of this report accords with Havering general power of disposal enshrined in section 123 of the Local Government Act 1972; The legislation gives all local authorities in England and Wales the power to dispose of land in any manner it wishes provided the land is disposed of for the best consideration that can reasonably be obtained. However, this rule has exceptions, such as "short tenancies" (less than seven years) and certain disposals for less than market value that are deemed to improve the area's economic, social, or environmental well-being of its area The council exploring the closure of the three libraries and use/dispose the libraries buildings for any appropriate meanwhile use/housing use and provided the disposal is based on an open market valuation, the disposal will satisfy the best consideration test. The Council must ensure that it complies with normal and prudent commercial practices.

b) The Council also has a general power of competence under section 1 of the Localism Act 2011; this is the power to do anything an individual can do provided it is not prohibited by other legislation. The Council may exercise the General Power for its own purpose, for a commercial purpose and/or for the benefit of others.

c) In addition, the Council also has the power under section 111 of the Local Government Act 1972 to do anything (whether or not involving the expenditure, borrowing or lending of money or the acquisition or disposal of

any property or rights) which is calculated to facilitate, or is conducive or incidental to, the discharge of any of its functions.

d) Section 122 of the Local Government Act 1972 allows appropriation for planning purposes. Appropriation in this context simply means transferring the allocation of the land from one purpose to another.

Local authorities usually allocate land for specific purposes under different statutory powers. They may have acquired the land pursuant to a statute which then regulates how the land must be allocated or managed (i.e. under the Public Libraries Acts 1892 to 1919, applicable to said three subject library sites) If the local authority decides that it needs to transfer land from one purpose or function to another, perhaps for redevelopment then it may appropriate the land under s.122 LGA 1972. Please note the procedural requirements relating to Appropriation Under Section 122 Local Government Act, Section 122 LGA 1972 provides that:

"The council may appropriate for any purpose for which the council is authorised by statute to acquire land by agreement any land which belongs to it and is no longer required for the purpose for which it is held immediately before the appropriation."

The key procedural points are as follows:

a) The land must already belong to the council,(b) The land must be no longer required for the purpose for which it is currently appropriated; and (c) The purpose for which the council is appropriating must be authorised by statute.

An appropriation memo will have to be drafted and authorised by Mark Butler or appropriate authorised officer citing the Cabinet Decision, delegated powers authorising the land to be appropriated and exercising the powers available under section 203 of the Housing and Planning Act 2016 (HPA 2016).which empower to override easements and other third party rights in relation to land that has been acquired or appropriated for planning purposes.

27. With regard to the three former libraries (Gidea Park, Harold Wood, South Hornchurch), there are no Asset of Community Value implications in relation to the proposed development of the three libraries, as can be inferred from the decisions of some case laws, notably The Ship case in South Norwood which closed as a pub, where it was stated interalia that "*the primary purpose of Asset of Community Value listing is to afford the community an opportunity to purchase the property, not to prevent otherwise acceptable development".* Reason being that an Asset of Community Value listing or nomination did not outweigh the benefits of providing additional housing and a viable use for the building, and appeal was allowed and permission was granted for the change of use/ development. The proposed redevelopment of the three libraries to deliver new homes should not deter the libraries designation / nomination as Asset of Community value or impede redevelopment of the libraries

Human Resources implications and risks:

There are no HR implications arising from this decision

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 and on this occasion this is not required.

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

The proposal to develop a 6-person residential unit for children with disabilities on the site of the former Gidea Park library is intended to address an identified and specific in-borough need for such a facility, providing a benefit to the residents and their families who currently have to travel out of borough for this provision. The subsequent business case from the Director of Starting Well will expand further on the positive equalities aspects of this proposal.

Health and Wellbeing implications and Risks

By augmenting the provision of residential facilities for children with disabilities, the proposal to develop a 6-person residential on the site of the former Gidea Park library will have a positive impact on the well-being of that client group and their families, who currently have to travel out of borough for this provision.

Subject to the further evaluation of meanwhile proposals for the former Harold Wood library premises from the Harold Wood Foundation, there may also be scope

to reduce health inequalities as a result of some of the initiatives proposed e.g. men's mental health.

The proposal to re-invest part of the capital receipt generated from disposal of the former South Hornchurch library site should facilitate improved and/or expanded facilities within the adjacent community hall, to support the health and well-being of local residents.

Environmental and Climate Change Implications and Risks

Any subsequent development proposals for the former library sites will be subject to current building regulations as a minimum requirement

BACKGROUND PAPERS

Report to Cabinet – 5th February 2025: Library Consultation Cabinet Report

(Public Pack)SUPPLEMENTARY 2 AGENDA ; Library Consultation Cabinet Report – Recommendations to Cabinet Agenda Supplement for Cabinet, 05/02/2025 19:00

Appendix A – site plans

Gidea Park – former library



Harold Wood – former library



South Hornchurch – former library



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Havering
LONDON BOROUGH

CABINET

Subject Heading:	Corporate Plan Q2 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 2 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 Performance Report will be brought to Cabinet at the end of each quarter.
Reviewing OSC:	

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 1 2025/26)
- Long-term performance – with the same time the previous year (Quarter 2 2024/25, where available)

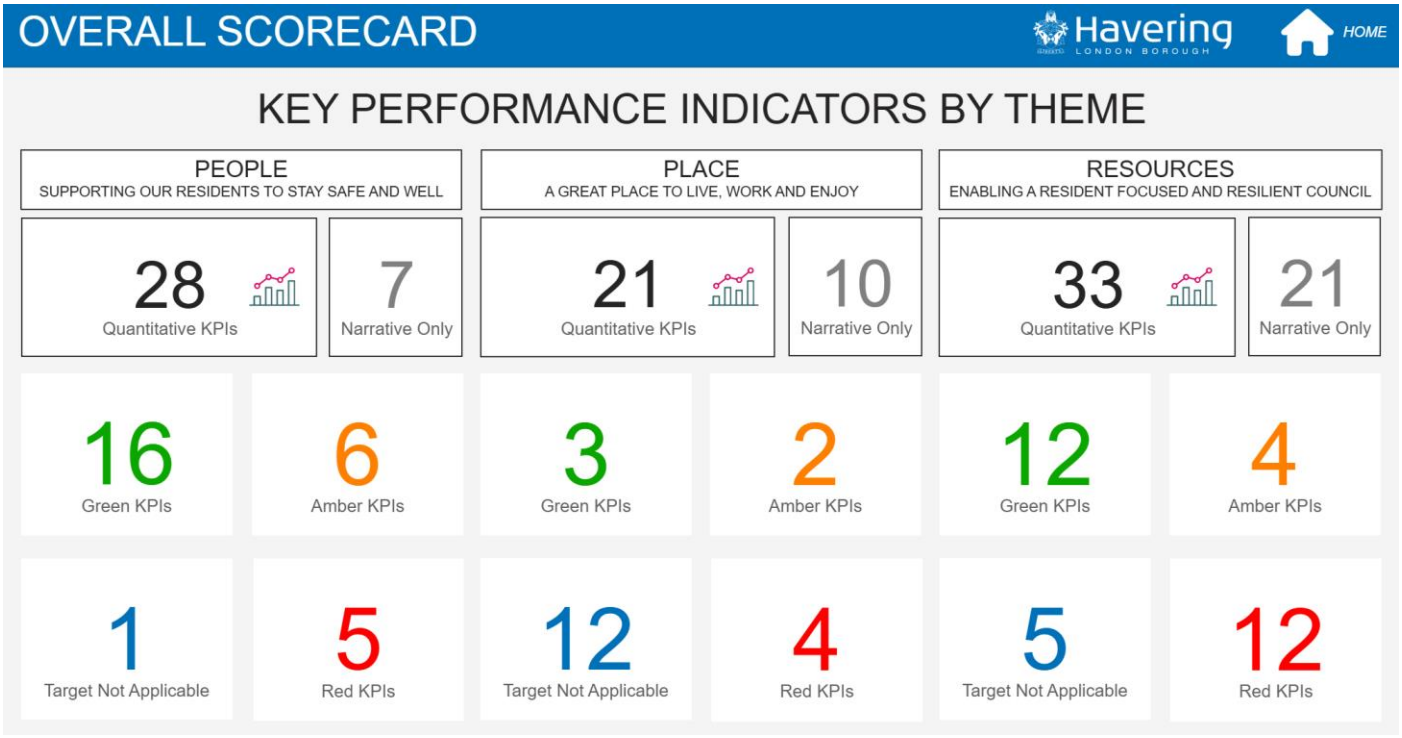
Please note the green arrow shows if (↑) higher performance is better or (ê) lower performance is better.

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.

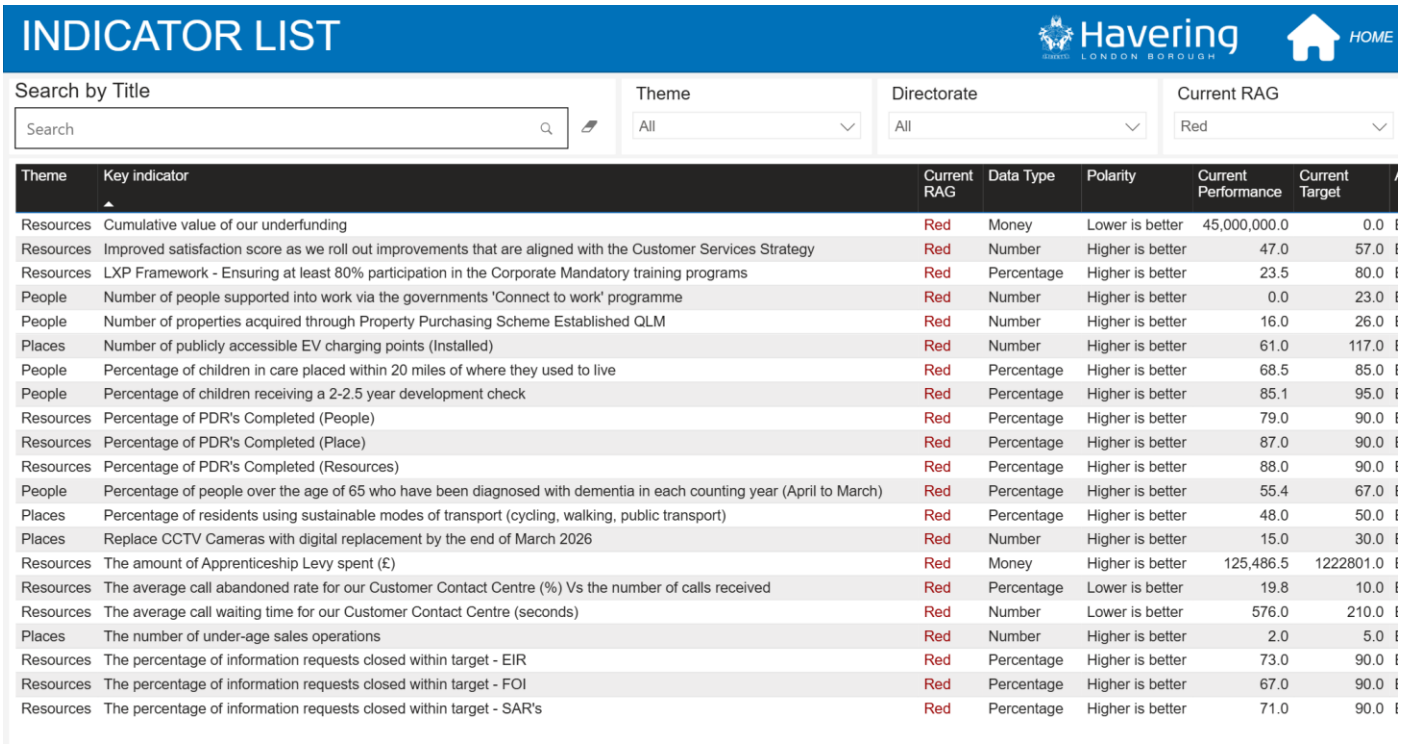
REPORT DETAIL

Quarter 2 2025/26 RAG Summary



1. As at the end of Q2 2025/26, **120** Corporate Performance Indicators have been measured.
2. Of these, **56** are either narrative only (38) or are KPIS for which a target is not applicable (18). The remaining **64** have been given a RAG status outlined below:
    a. **31 (48.44%)** have a RAG status of **Green**.
    b. **12 (18.75%)** have a RAG status of **Amber.**
    c. **21 (32.81%)** have a RAG status of **Red**.
    - Of these, 9 (50%) 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 22nd 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.

PLEASE NOTE: The four indicators that relate to the percentage of staff achieving 'performing well or better' in their PDRs have been removed from the report. This is because following the move over to the new LXP system to record the PDR's we are unable to collect the data for this indicator. As a continuous improvement of the system a calibration element to report performance grading for 2025/26 is being designed, so could be picked up for next year if required.



INDICATOR LIST

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Search by Title

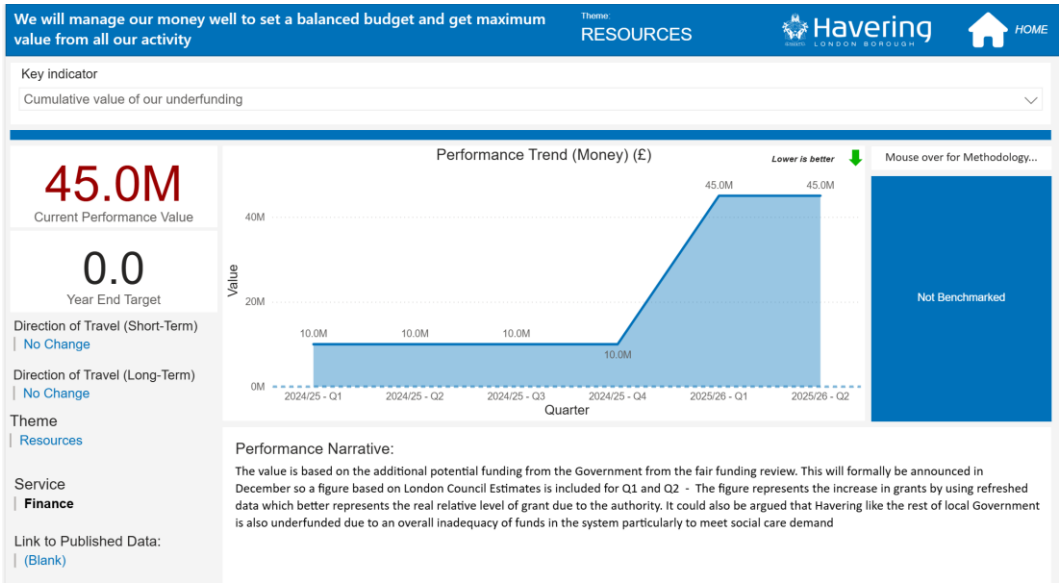
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Theme: All

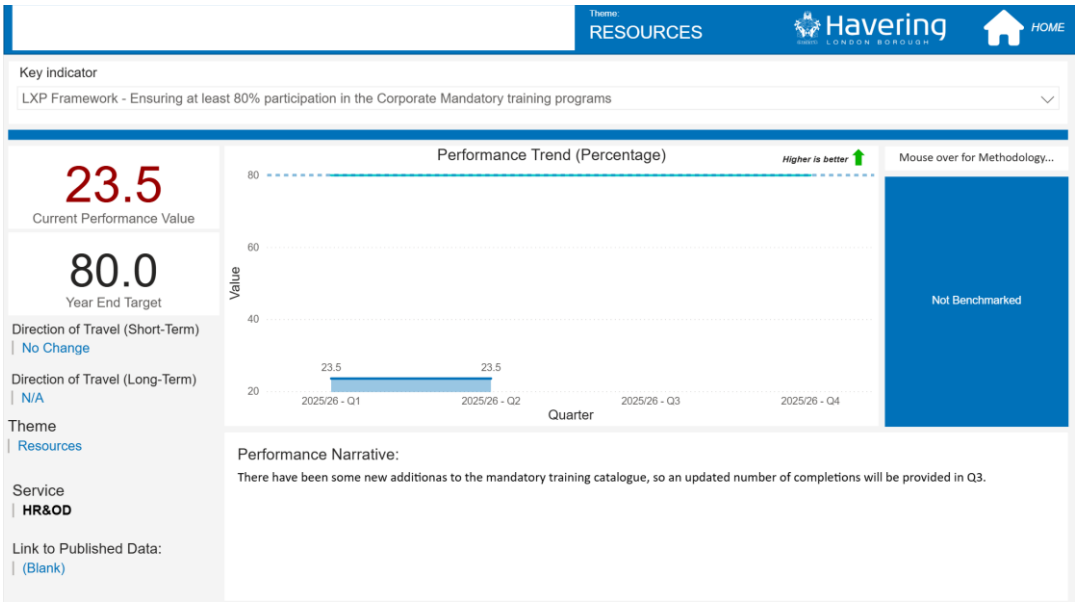
Directorate: All

Current RAG: Red

Theme	Key indicator	Current RAG	Data Type	Polarity	Current Performance	Current Target
Resources	Cumulative value of our underfunding	Red	Money	Lower is better	45,000,000.0	0.0
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	80.0
People	Number of people supported into work via the governments 'Connect to work' programme	Red	Number	Higher is better	0.0	23.0
People	Number of properties acquired through Property Purchasing Scheme Established QLM	Red	Number	Higher is better	16.0	26.0
Places	Number of publicly accessible EV charging points (Installed)	Red	Number	Higher is better	61.0	117.0
People	Percentage of children in care placed within 20 miles of where they used to live	Red	Percentage	Higher is better	68.5	85.0
People	Percentage of children receiving a 2-2.5 year development check	Red	Percentage	Higher is better	85.1	95.0
Resources	Percentage of PDR's Completed (People)	Red	Percentage	Higher is better	79.0	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
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	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	15.0	30.0
Resources	The amount of Apprenticeship Levy spent (£)	Red	Money	Higher is better	125,486.5	1222801.0
Resources	The average call abandoned rate for our Customer Contact Centre (%) Vs the number of calls received	Red	Percentage	Lower is better	19.8	10.0
Resources	The average call waiting time for our Customer Contact Centre (seconds)	Red	Number	Lower is better	576.0	210.0
Places	The number of under-age sales operations	Red	Number	Higher is better	2.0	5.0
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



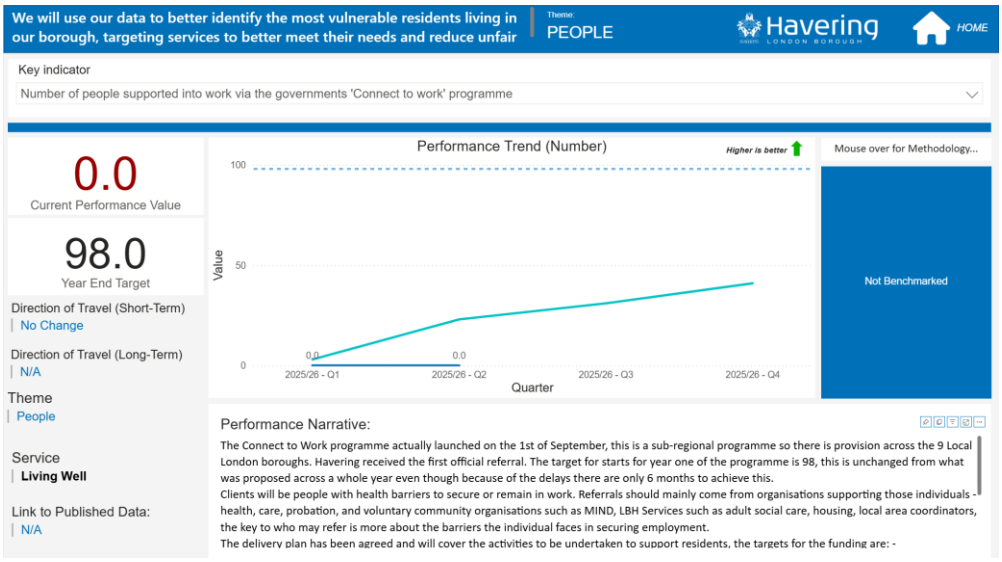
The amount of underfunding has increased from £10m to £45M. The value is based on the additional potential funding from the Government from the fair funding review, which will be formally announced in December 2025. The figure represents the increase in grants by using refreshed data which better represents the real relative level of grant due to the authority.



The most recent LXP reports cover Quarter 2 (July–September) and are included in the workforce dashboard which is provided to all Directorates.

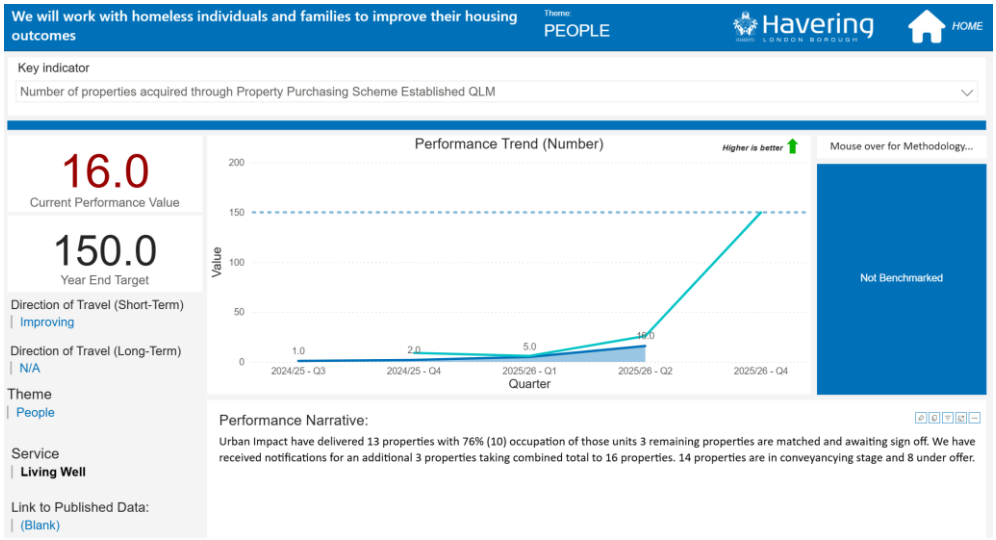
Unfortunately, there were additions to the mandatory catalogue, disruption to the Employee data imports following the Big Move, preventing accurate reporting for Corporate Mandatory Training in October and again in November, coupled with a continuing technical issue, which is affecting new staff access to training and the collation of data we were unable to provide an accurate figure against the annual 80% target, however we are aware that the completion rates for Corporate Mandatory Training have improved since Q2, largely driven by Directors and line managers. Training is being streamlined and tailored to Havering-specific needs, strengthening engagement and relevance.

Work is underway to restore employee record updates within the LXP, which will enable accurate reporting to resume, enabling the Learning & Organisational Development (L&OD) team to continue to provide monthly reports to strategic directors, offering granular insights into areas where training and 1:1 uptake remains low. Once reporting resumes, we anticipate being in a stronger position, though completion rates are expected to remain below the 80% target in the short term.

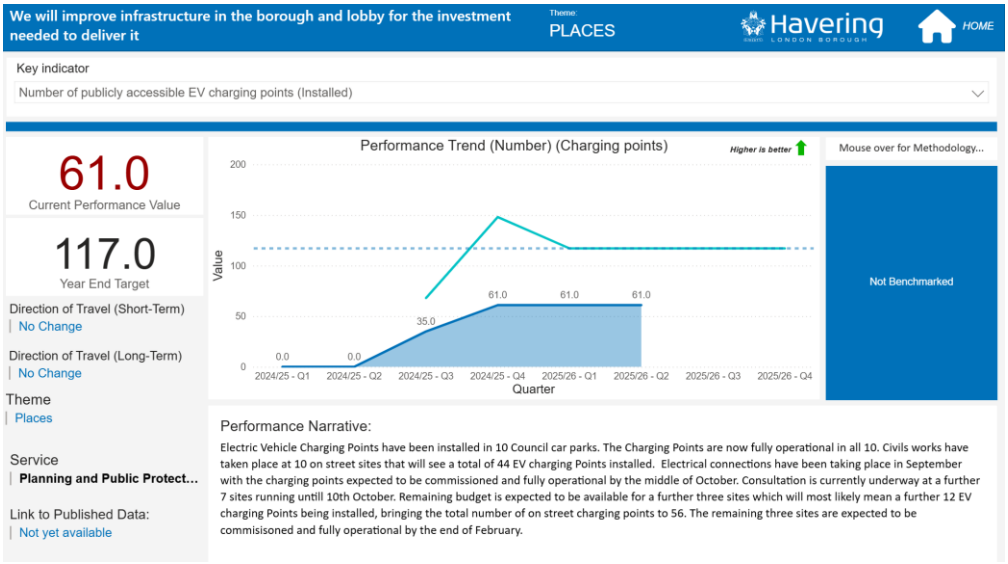


The ‘Connect to work’ programme was due to start in June 2025, but there was a delay in getting the programme up and running, meaning that this did not start until September. Now that it is launched there is a delivery plan which has been agreed and will cover the activities to be undertaken to support residents. We will need to undertake a

recruitment exercise to employ specialists as the programme grows. Throughout Q3 and Q4 we will monitor performance weekly; undertake presentations to referral partners and recruit staff to grow capacity.

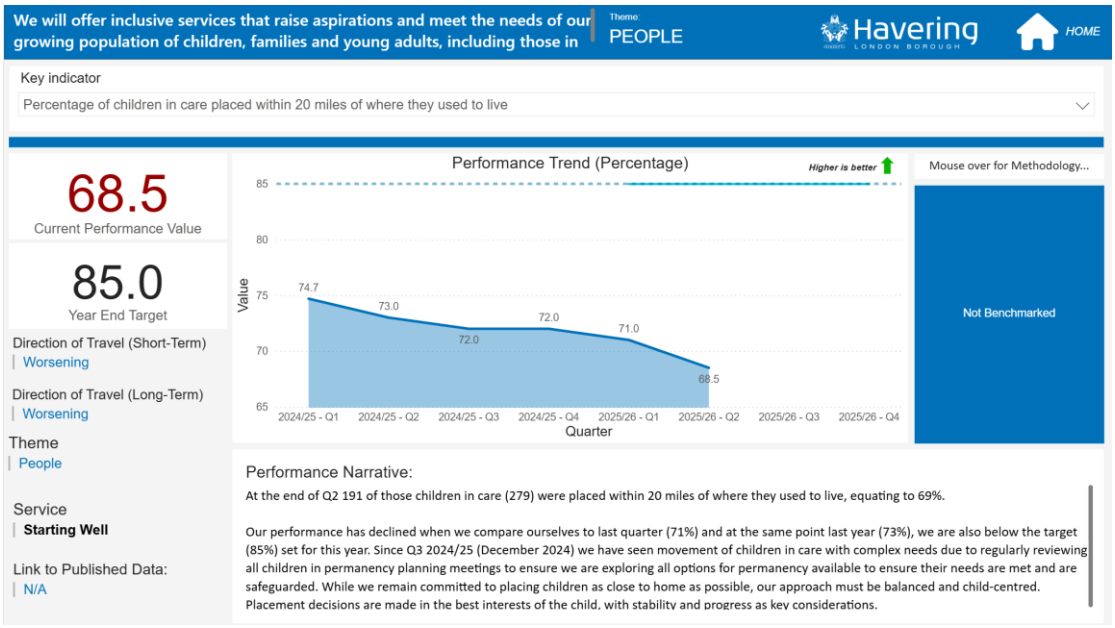


Although this is showing as a red indicator, this is because we have set ourselves a 150-unit target by the end of Q4 2025/26. We were slightly behind the Q2 target of 26. 14 of the properties are in the conveyancing stage and 8 are under offer at the end of Q2. We speak weekly with our provider Urban Impact who are working to increase the pipeline.

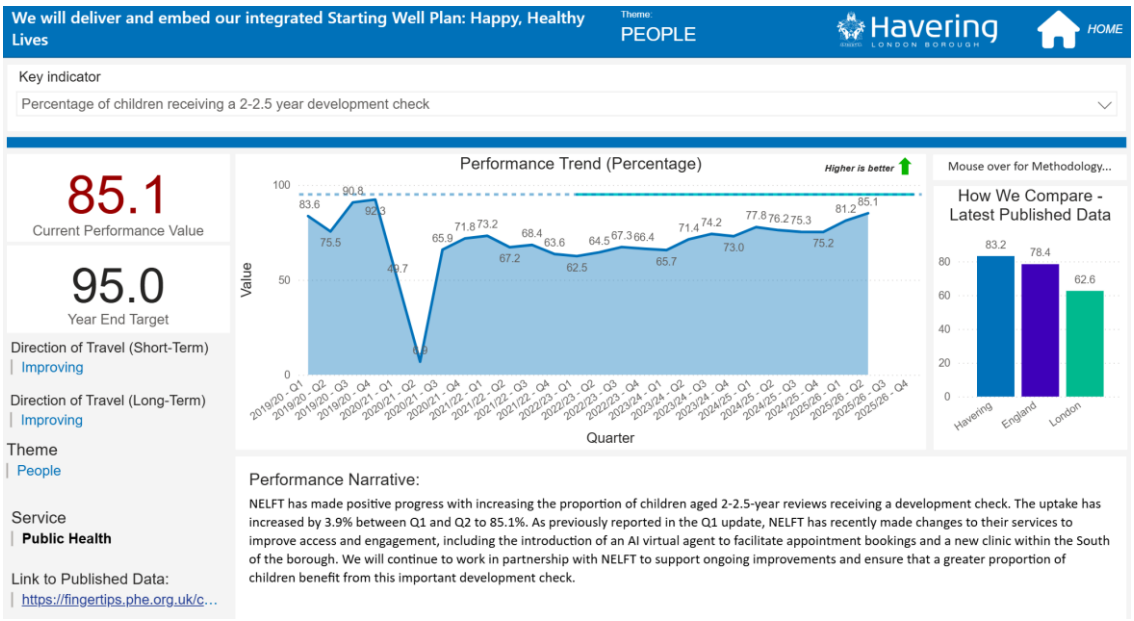


We have already installed 61 charging points, across 10 Council car parks, all of which are now fully operational. Project completion has been delayed until February 2026 in part due to consultation outcomes resulting in new on-street locations having to be identified and progressed.

A further 55 charging points are being delivered across 13 residential streets across the borough. Infrastructure has been delivered across 9 sites so far and these are expected to be operational by the end of the year. A further four sites are due to be implemented in the new year with the aim for installation being completed by the end of February 2026.

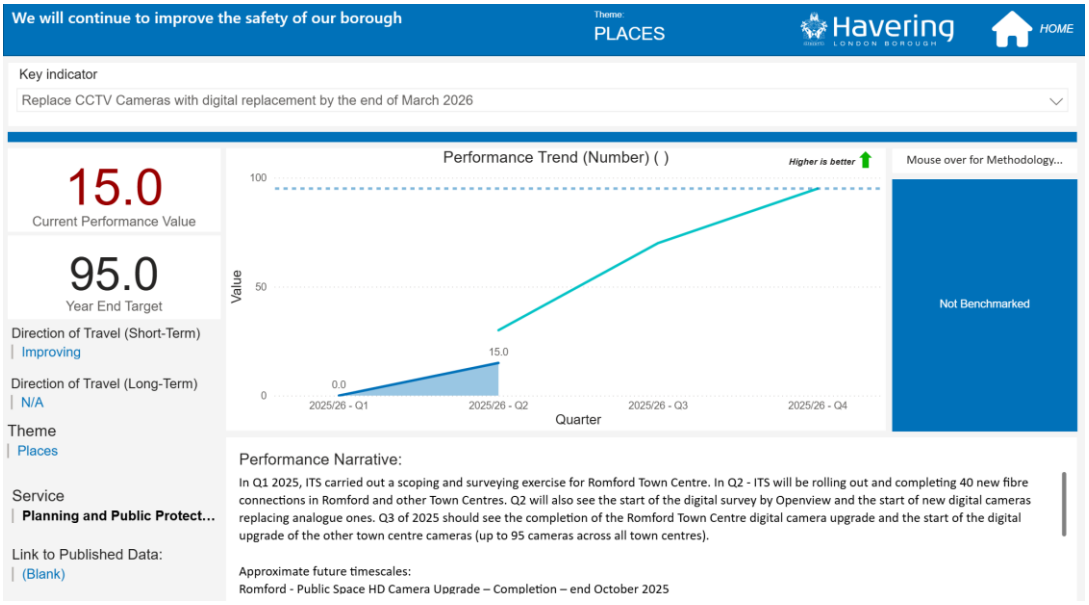


As the chart shows, the performance has slowly been declining over the last year. We started to see some movement of children in care with complex needs from December 2024, which has affected our performance. We are committed to placing children as close to home as possible, as our approach is based on the interest of the child with stability and progress as key considerations, and have recently increased fostering allowances in a bid to support us to recruit more in house foster carers, which are more likely to be within 20-mile radius. We are working with Local Community Fostering (LCF) (the North-East London Fostering hub) to look at our communications and advertising strategy to increase enquiries. We have six 'form F' assessments underway, expected to be presented to fostering panel by March 2026, and have a significant number of kinship assessments which are being completed, we have looked to commission these out of the team so that we can focus on completing mainstream foster carer assessments.



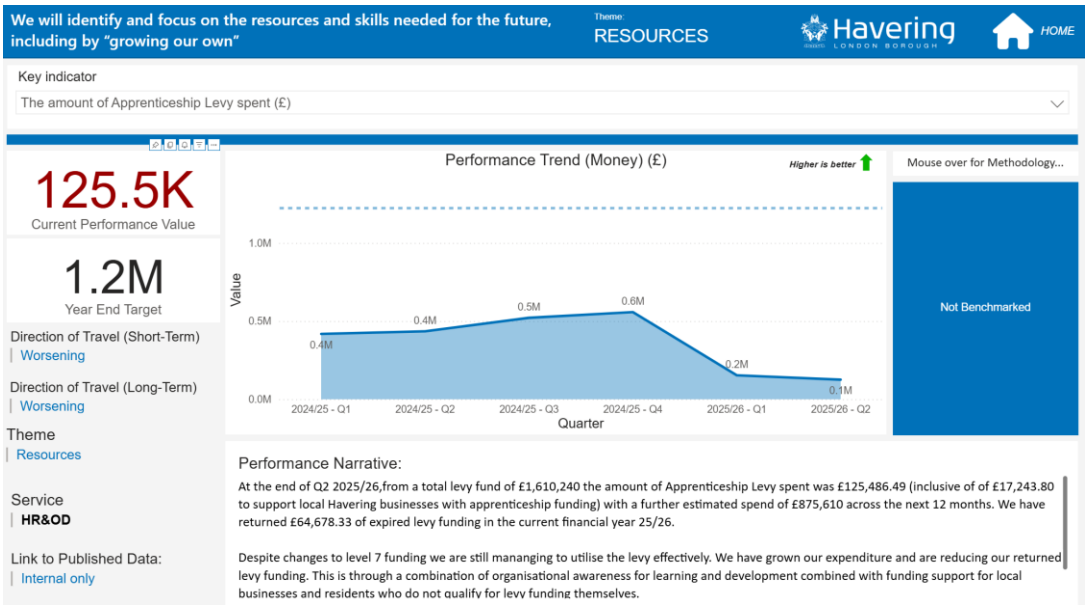
As you can see from the chart we have seen an improvement in performance when compared to last quarter, this is due to the fact that NELFT are continuing to actively review and enhance their processes to maximise the uptake of the 2-2.5 years reviews. To continue the improvement of performance some 0–19 staff have adjusted their hours under the flexible working policy, to enable more appointments outside the standard 9 – 5 schedule. NELFT has also introduced a new clinic at Beam Park Health Centre to help address the non-attendance in the south of the borough. Appointments for 2-2.5 years reviews can now be booked and changed via an AI virtual agent called 'Harper',

allowing parents to easily book and move appointments up to and including the day of the appointment. NELFT are continuing to work closely with local partners to contribute to joint initiatives aimed at increasing the uptake of 2–2.5-year development checks, including the council's communication team who are working closely to align the sharing of key messages to promote 2-2.5 years reviews and the importance in relation to school readiness.



We are currently below the quarterly targets which were established at the end of Q1, which is reflected in our status being marked as Red. Only 15 cameras were installed in Q2, falling short of the target of 30.

There have been several delays which have occurred due to diverse issues with the new infrastructure rollout, which paused progress for several weeks. Issues at the beginning of the year caused by pausing the project to switch over to the existing Dark Fibre added at least three months onto the project timeline. This required highway works to be carried out at 40 new locations, but these are an investment in both time and money and will see huge savings over the next 18 years as part of the contract. There was a technical integration issue identified in October/November which paused the project further and as multiple agencies are involved in the project (BT, ITS, internal ICT, Highways), this led to a delay in problem solving the solution. That technical issue has now been resolved, and the actual figure will catch up to target in 2026. Completion of town centres was expected before Christmas, but is now looking like February 2026, with the Housing (Phase 2) starting after that and completing later in 2026.



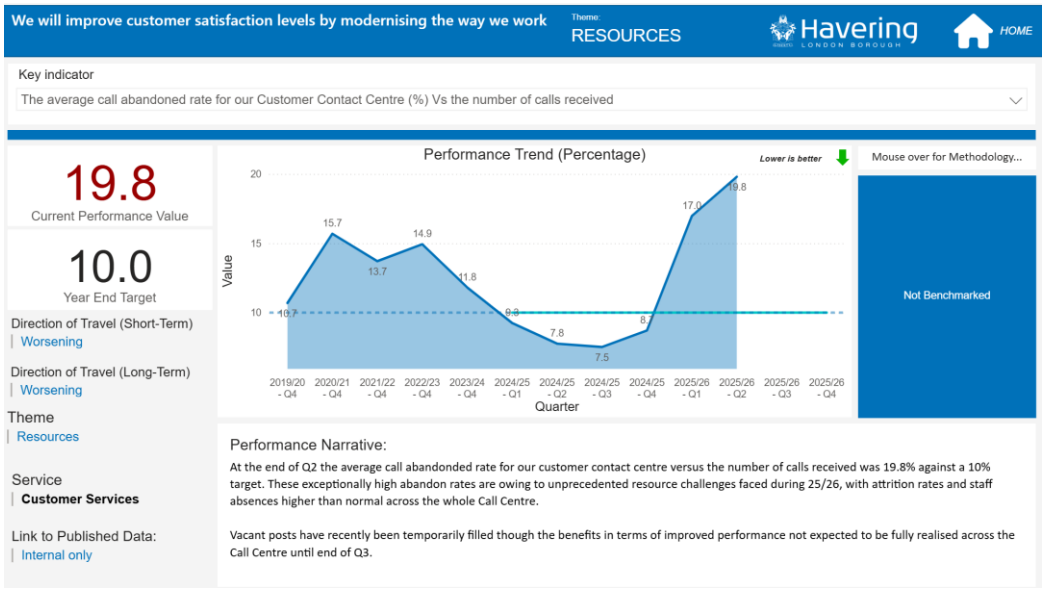
As at the end of September 2025, we had spent £125,486.49 from the £1,610,240 levy fund. We will continue to optimise the use of the apprenticeship levy by encouraging services across Havering to invest in apprenticeships as part of their workforce development planning. This includes actively promoting the benefits of apprenticeship pathways, supporting departments to identify appropriate programmes and ensuring that levy funds are deployed effectively to improve productivity, build capacity, and enhance long term organisational goals.

To maximise levy spend, we regularly advertise a range of apprenticeship programmes aimed at upskilling current staff. These opportunities support career progression and ensure employees gain the qualifications and competencies required in a rapidly evolving public sector environment. We are also in the process of organising Apprenticeship Week, which will showcase a variety of development pathways including AI, Data, Leadership, and Project Management programmes. This aims to raise awareness; increase take up and highlight the importance of apprenticeships in developing a future ready workforce.

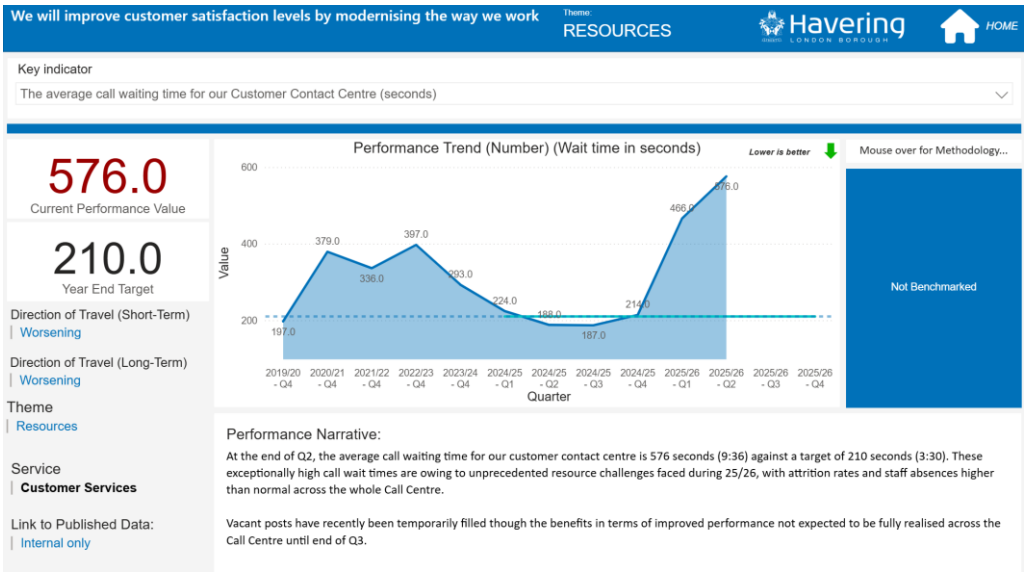
We also work closely with managers across the organisation to support the creation of new apprentice positions. This includes advising on suitable standards, help shape job descriptions and encourage services to consider apprenticeships when recruiting to entry level roles. Our objective is to continue increasing the number of new hire apprentices to strengthen our pipeline of early career talent.

In addition to internal development, the move to online levy transfer requests to the Digital Apprenticeship Service (DAS) has resulted in a notable increase in the number of transfers made to local small local businesses. This supports the wider local economy by enabling smaller employers to access funded apprenticeship training that they may otherwise have been unable to afford. We remain committed to continuing these transfers to help strengthen skills development across our community.

We are continually exploring new and innovative ways to maximise levy utilisation. This includes identifying skills needs and working with external partners to ensure that all possible opportunities for investment are considered. The apprenticeship levy remains a key resource in building a skilled, adaptable and sustainable workforce for the future and we will continue to focus on ensuring its full and effective use.



There was a decline in performance when compared to both last quarter and Q2 2024/25. This is essentially down to unprecedented resource challenges. We are hopeful that following the temporary fulfilment of vacant posts will see an improvement in performance in Q3.

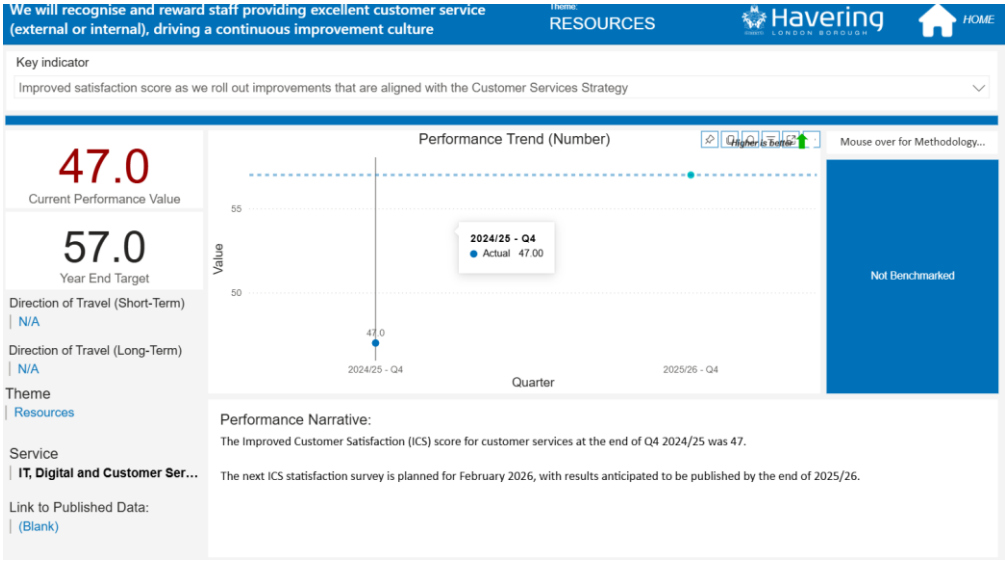


There was a significant decline in performance from Q4 2024/25 to Q1 2025/26 and we have declined further in Q2. This is essentially down to unprecedented resource challenges. We are hopeful that continued effective management of staff absence on top of recruitment to vacant posts will improve our performance rates bringing our call wait times back down to below 210 seconds (within target) by the end of Q3.

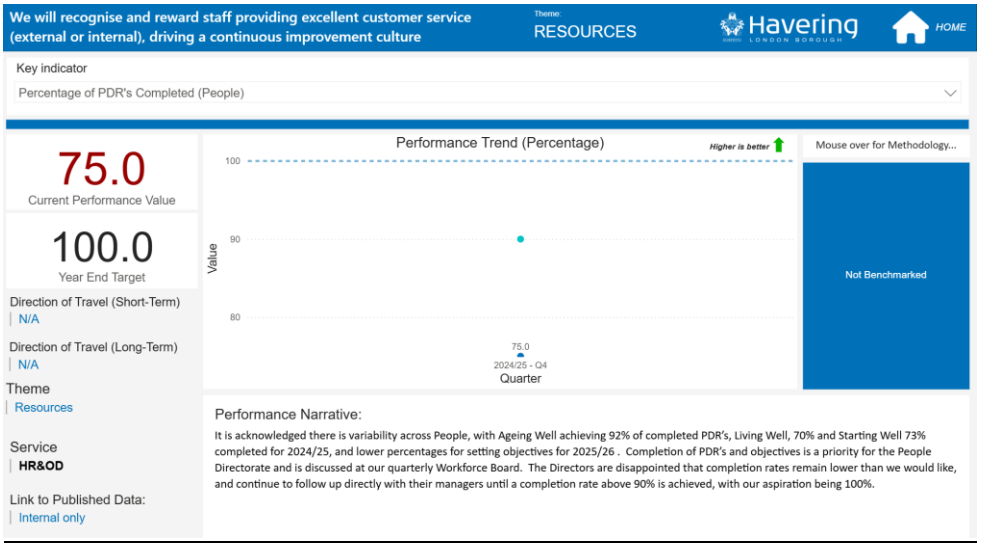


We are behind on our quarterly target having only completed 2 operations at the end of Q2. However, as part of those operations we have visited 18 premises and with only one failure during Q1. The slow start is due to a lack of child volunteers. Over the past twelve months, the department has faced several challenges that have affected the ability to meet the required number of age restricted test purchases. The most significant factor has been the shortage of child volunteers. Despite holding outreach sessions, engaging with local community groups and approaching council staff, recruitment has yielded very limited results. This has directly restricted the capacity to conduct the volume of underage sales (UAS) operations needed to meet the targets.

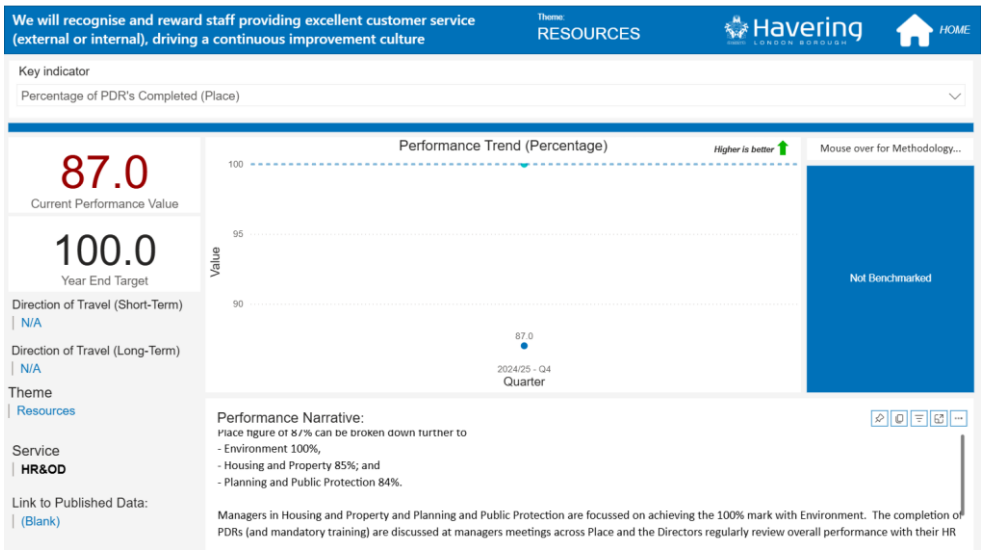
Annual Indicators



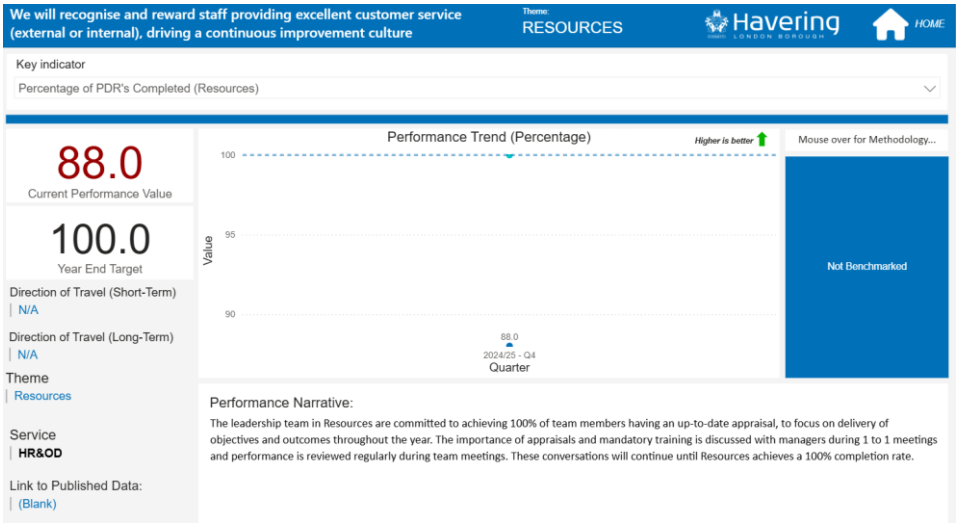
The Improved Customer Satisfaction (ICS) score was completed at the end of Q4 2024/25. We used this result to set the target for this year, which is why we are below target. The score will remain as it is until we conduct our next resident ICS survey to measure customer satisfaction, planned for September 2026, with an updated score by end of the financial year 26/27.



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%.

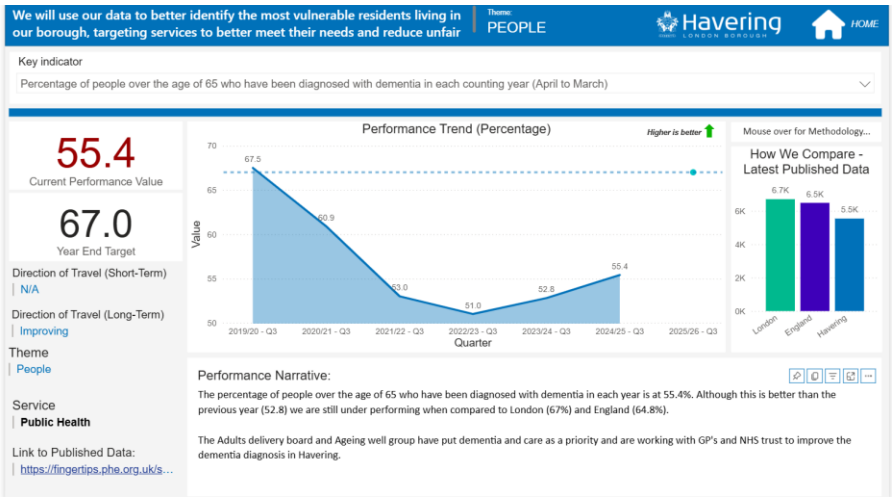


Although 100% of Environment completed their PDRs, overall Place performance was bought down by the 85% Housing and Property and 84% Planning and public protection. Managers in both areas are focused on achieving 100% this year. Completion of PDRs are discussed regularly at managers meetings and Directors regularly review their overall performance with the help of their HR business partner.



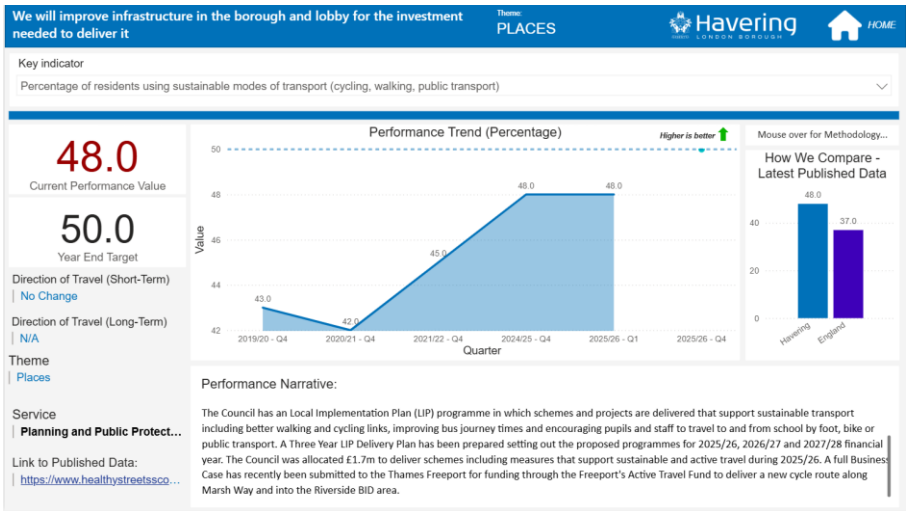
Resources performance is made up of 8 areas. Although Strategic HR&OD and Finance completed 100%, performance was reduced by the other 6 areas (Public Health (94%) Customer Services Transformation & IT (92%) Partnership Impact and Delivery (85%) Exchequer and Transactional Services (78%) Technology & 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.

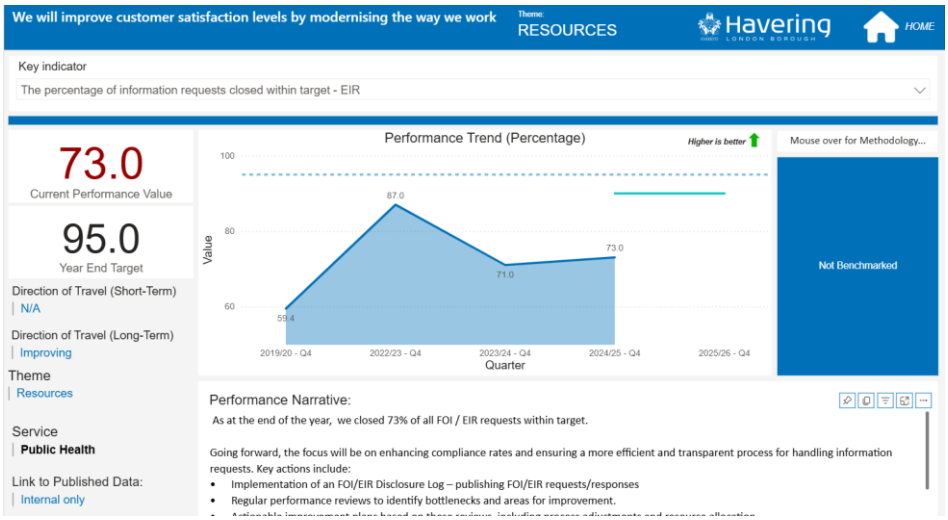


The adult delivery board and Ageing well group have put dementia and care as a priority and are working with GPs and NHS trust to improve the dementia diagnosis in Havering. This, coupled with the work that the ICB are undertaking with NELFT to ensure capacity at the memory clinic will help us with our performance and achieving the 67% end of year performance.

Dementia outcomes are being improved with five key strands from prevention and diagnosis to supporting well, living well and dying well. This is by providing information and promotion of healthy lifestyle to prevent dementia and to live well with dementia; reducing waiting time by NELFT for diagnosis, targeted referrals by GPs and MDT pilot at St George's hub; providing new dementia support through Alzheimer's society; increasing universal care plans (UCPs) and strengthening end-of-life care by additional dementia lead role at Saint Francis Hospice.

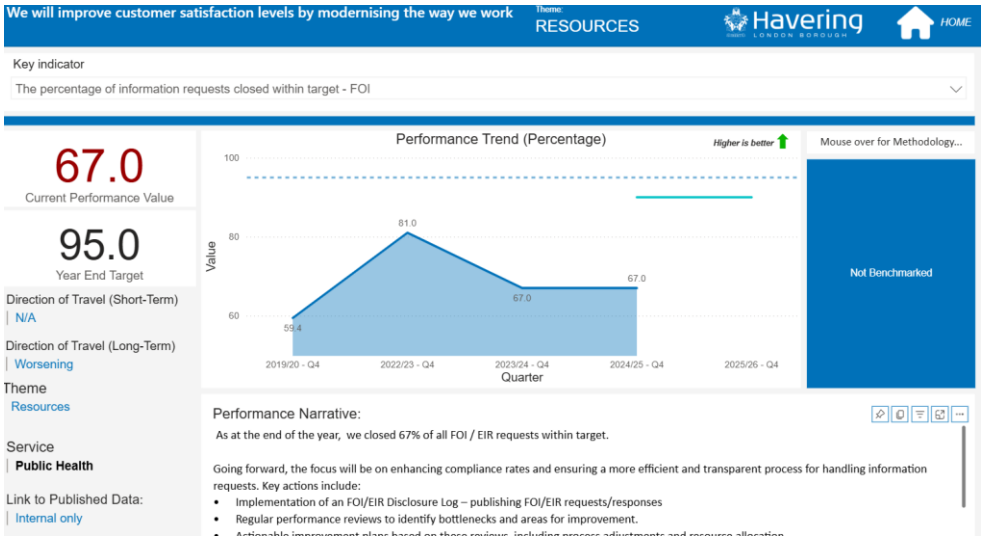


Although we are showing as red, we are only 2 percentage points below the 50% target. The latest figures set out in Figure 7 of Transport for London's Travel in London 2024 – Annual Overview report, indicate Havering now has an active, efficient, and sustainable trip based mode share of 50%. This is based on the most current two-year average from the London Travel Demand Survey (LTDS). An Active travel strategy has been drafted which presents our vision for active travel in Havering over the next decade and is due to go to Cabinet for approval in the new year. This strategy, together with the Local implementation Plan (LIP) programme both support sustainable transport including better walking and cycling, which is envisioned will continue to improve performance.



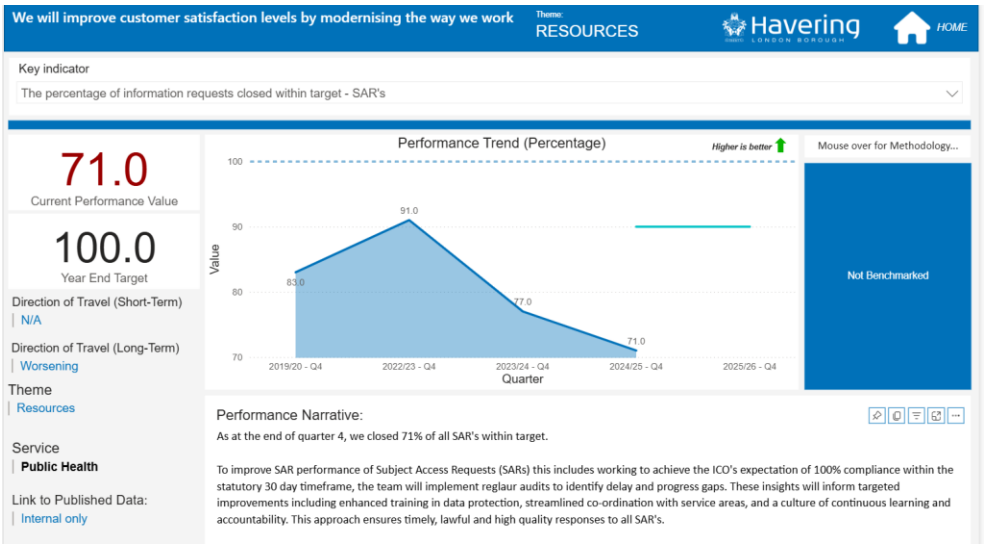
Although we have seen an improvement in performance from 2023/24 to 2024/25 the performance levels indicate more work is needed.

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 Environment Information Request's (EIR's) will help identify discrepancies and areas for improvement 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 Freedom of Information Requests (FOI's) will help identify discrepancies and areas for improvement to make the necessary adjustments to the process, ensuring we meet our compliance goals efficiently and effectively.



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 Subject Access Requests (SAR's) will help identify discrepancies and areas for improvement 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:

This report asks Members 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; there are no direct financial implications directly arising from this recommendation, however, it is noted that adverse performance against some Corporate Performance Indicators may have financial implications for the Council. Furthermore, correcting poor performance can in some instances 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 governance and efficiency.

Reviewing the actions taken to address areas of underperformance, will promote continuous improvement in the way in which the authority's functions are exercised.

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 socio-economic 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_2
Production of 1 A4 sheet paper	5g CO_2
Laser printing	10 pages per minute = 10.27g CO_2
One internet search	0.2g CO_2
Average website page view	1.8g CO_2

Printing a single report to include all 120 corporate performance indicators would have a carbon footprint of approximately 723.24g CO_2. For all nine cabinet members this would equate to just over 6.5kg CO_2 per quarter, or 26kg CO_2 per year. Printing this 17 page report will equate to 96.432g CO_2 per member (approximately 867.888g 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:
https://issuu.com/haveringcouncil/docs/6609_vision_for_havering_v9

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