

## Romford Masterplan Supplementary Planning Document Consultation Statement: Appendix 1 Word Version (for printing).

Havering Statement of Consultation Responses from the Formal Consultation  
Sept-November 2024

Please note that the *Consultation Statement: Appendix 1* Excel formatted document contains identical information with the comments separated out in response to the online questions.

### Online questions: (MC1-MC19).

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| <ol style="list-style-type: none"> <li>1. Do you have any comments on the Vision for Romford?</li> <li>2. Do you have any comments on the Masterplan objectives?</li> <li>3. Do you have any comments on 'Space and Landscape'?</li> <li>4. Do you have any comments on 'Movement and Connectivity'?</li> <li>5. Do you have any comments on 'Sustainability'?</li> <li>6. Do you have any comments on 'Inclusivity, Health and Wellbeing'?</li> <li>7. Do you have any comments on 'Character and Townscape'?</li> <li>8. Do you have any comments on 'Uses and Mix'?</li> <li>9. Do you have any comments on 'The Economy'?</li> <li>10. Do you have any comments on the site guidance for Market Place?</li> </ol> | <ol style="list-style-type: none"> <li>11. Do you have any comments on the site guidance for St Edwards Way?</li> <li>12. Do you have any comments on the site guidance for Brewery?</li> <li>13. Do you have any comments on the site guidance for Station Gateway?</li> <li>14. Do you have any comments on the site guidance for Rom Valley?</li> <li>15. Do you have any comments on the site guidance for Liberty?</li> <li>16. Do you have any comments on the site guidance for Mercury?</li> <li>17. Do you have any comments on the site guidance for North Street?</li> <li>18. Do you have any comments on the site guidance for Civic Campus?</li> <li>19. Do you have any comments on the site guidance for Crow Lane?</li> <li>20. Do you have any further comments?</li> </ol> |
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Consultation documentation stated that responses to this consultation will be published online. Personal detail, such as contact information of individuals submitting representations will be redacted, although names may be published.

Name / Organisation	Comments Made	Council Response
Local Resident	<p>"How are disabled people going to get there if they have to use public transport. the bus service will only allow one or 2 wheelchairs at a time. What shops are there going to be as one by one they are shutting down. getting replaced by fast food or coffee shops. who is going to keep it clean and make sure any plants are going to be watered. How are you going to top vandalism Who is going to pay for this?" "you are going to make it unusable to the older people and disabled people as how are they going to get there. Bus service is rubbish." looks nice but will it stay that way? how are disabled people and old people going to use it?? where is the money coming from? "what about disabled people. As in how are they going to get there?????????" its ok but looks like any other place in London. it will not do anything unless you bring down rent that shops have got to pay as well as the market people. Brewery is bad not enough parking for local people "make it like Romford its been known for its fantastic market now its dead and its going to look like any other part of London. Where is its history gone?????????"</p>	<p>Comments noted. Please refer to section 3.3 of the consultation statement for proposed changes on these topics.</p>
Local Resident	<p>Romford doesn't need physical improvement. There just needs to better use of the current units to provide the facilities that are needed Car parks are needed for many reasons especially for disabled. Not all disabled people have blue badges and you should know that as you are reluctant to issue them. Where are the business organisations and charities going to go from the buildings being knocked down in the high street? These charities have helped you enormously over the years. Pedestrianisation of the ring road is going to cause traffic elsewhere There are lots of green spaces in Havering already. People don't come to Romford town centre to hang out in parks. They do it to work, eat shop and connect to public transport Restricting car parks is ableist. Rubbish all of it Restricting car parks is ableist. Closing down charities will have a negative impact on the borough which a few trees and river walk is not able to replace Romford is already crowded. Money should be spent in other parts of the borough which need uplifting and better transport links No thoughts for disabled</p>	<p>Comments noted. Please refer to section 3.3 of the consultation statement for proposed changes on these topics.</p>

	<p>people. We need car parks that are close to where we need to be. Not all disabled people are the same and have blue badges. You are actually restricting movement for many Council can't afford this spend when services are being cut everywhere else and a landfill fire is burning in Rainham. It is a slap in the face for other parts of the borough which need rejuvenating more and for people who have had services cut or breathing in toxic landfill fumes. The market can be improved with less restrictions to current stalls not with a slap of paint. Why is nothing being done about old Debenhams unit? Getting rid of more car parks is a joke. It is always full and much needed. It had just had a massive upgrade and doesn't need another "Where are the charities going to go? Carers hub, smile etc Havering Volunteer Centre has been a major asset for you. What help will you give them in relocation?" Absolute joke. "Stop this immediately. The borough doesn't need it and can't afford it. How can you justify this when you spend money on fixing the landfill fire and have cut services to most vulnerable. Also there are other parts of the borough that's needs rejuvenating first. Romford has had enough money spent on it. Making it more sparkling is not gonna change crime etc."</p>	
Local Resident	<p>"Whatever the 'vision' it must not discriminate against drivers, what I have read it does discriminate, and is a plan mastered by TFL and Sadiq Khan, both well known anti driver punishment authorities which include the hated unfair ULEZ zone. Parklets have been mentioned. Parklets are a total waste of money and block travel areas. More cyclists are wanted? why? residents travel to what is best for them and cycling is not practical or possible in many cases, this will mean more anti driver measures put in place. I do not agree with any measure which will mean less road space, more difficulty driving to any area less car parking LTN's or any other anti driver measure in the pipeline." "The objectives are to force drivers off the road by making it as difficult as possible to drive to the town. Mass housebuilding will also only cause more congestion and traffic and then drivers will be blamed. TFL and Khan are anti driver, and should have no say whatsoever in how Romford town centre is run or operates its systems. Scrap all anti driver measures, scrap all parklets, retain or increase all car parking spaces with cheap parking fees." "Excessive housing development. The plan wants to ration parking spaces in Romford market place, another anti driver measure to which I totally disagree, leave all car parking spaces as is, in fact car parking spaces should be increased due to higher populations if proposed new housing is built." "It says: ""the Council has an obligation under the London Plan to reduce private car use and provide fewer parking spaces in comparison to other parts of the borough" "This is yet more discrimination against drivers, Havering council is obeying Khan and TFL?" Air quality in Havering is good, we already have ULEZ scam cameras in the borough, no more measures are needed. "The plan is to get rid of cars, a discriminatory disgrace. I disagree with the plan." Disagree with the measures. The plan is obviously anti driver and should be scrapped.</p>	Noted
Local Resident	<p>I fully support the vision for Romford which will hopefully revitalise the town centre and surrounding area, arrest its current decline and make it a far more attractive place to visit for shopping and leisure activities. On the whole, the stated objectives are reasonable and appropriate. While supporting a reduction in the town's carbon footprint I would however question the feasibility of achieving net zero by 2030 and I have reservations about creating a local energy company. Too many of these schemes have failed in the past. Regarding rail access into Romford, better use could be made of the London Overground line from Upminster. One train every half hour is inadequate and consideration should be also given to providing additional stops where the line crosses Wingletye Lane and Brentwood Road.</p>	Noted
Local Resident	<p>"The vision for Romford has my full support; the master plan addresses the need to encourage residents to make use of green travel whilst bringing in pockets of green spaces in and around the town centre. The improvements to the marketplace allow a much more welcoming and thriving public realm removing the utilitarian parking which reduces the quality of the open space. "The objectives are appropriate for the improvement of the area, specifically the alterations to the ring roads and the underpasses as these are unwelcoming and feel unsafe. I particularly feel drawn to the celebration of River Rom as it holds the potential to repurpose the surrounding areas where people can enjoy the public space." "It is well thought out and designed. While I'm not a cyclist myself it is very clear private vehicles are prioritised on the road with nearly no dedicated bus lanes. The introduction of dedicated lanes should allow for those to feel much safer while traversing to the town centre. The illustrations are also extremely helpful in envisioning the objectives." "The character of the ring roads around the centre contribute to a poor and brutalist environment. The visuals which</p>	Noted

	<p>show increased urban greening and dedicated cycle/bus lanes would be key in achieving a successful public space. This has my support." Not an expert in this area but it looks good. Local residents including myself would be content in walking/cycling if the infrastructure is in place. Unfortunately several areas around Romford are neglected, the road surface is much smoother to walk on compared to the actual pavement. Building upwards can sometimes not be avoided especially where it contributes to housing but it should proceed with caution. The guidance written within this section is appropriate. Strong support for the visions of the market place as it acts as a public arena for trade, performance and recreation. As much as I like the waterway, I have only just familiarised myself with the brewery and as I have experienced it's very popular on the weekend. I imagine several residents being against this concept as the proposed areas would seem more like a modern plaza similar to Stratfords Westfield where most retail spaces are indoors in large complexes. Possibly even overconcentrated with different uses. The massing in the illustration can appear confusing for some as there would now be several passages which can be off-putting. In the long-term, thinking of the connection it provides to London, the redevelopment is no doubt needed to create a buzzing environment but should try to avoid sleeper city style units where possible. Everyone involved in the creation of this document has done a top job. Overall I find the master plan sets a positive outlook for the future of Romford.</p>	
Local Resident	<p>At a time when L B Havering is struggling financially, it is complete folly to commit to such a huge spending plan which ultimately residents will have to pay for. Save the plan until we are financially viable. No one should embark on huge spending plans when you can't afford it.</p>	Noted
Local Resident	<p>Delusional. The market has declined and has had its day. Romford is not currently a major leisure destination - rather a no-go area with an alcohol fuelled offering at night. There is no mention of eliminating this or of introducing anything of significant change to overcome it. Nothing creative here. More of the same which is not good enough. Romford is way too spread out. It makes sense to focus on one or two areas for retail and entertainment. The brewery makes sense to be one of these given its existing offering. Don't waste public funds trying to revive declining areas with no chance of recovery. The whole plan seems to lack realism and focus. The existing theatres and cinemas are not prominent and struggle for funds. What other entertainment will attract people back to the area? How will we get rid of the prominent alcohol alley from the station to the shopping areas - and the people it attracts? The plan seems to be 200 pages too long - and full of consultants speak to justify fees.</p>	Noted
Local Resident	<p>I recall when our town centre was seen "as a whole" with a Town Centre Manager. Nowadays it's 4 separate competing concerns with little sign of co-operation. The Liberty, Mercury Mall, The Brewery and Romford Market Place &amp; Hall. Romford needs to - again - sell itself as one large shopping/retail unit - with all stakeholders pulling in the same direction with co-operation. Our Market Place is nothing like it once was, when I first visited it in the 1960s - and worked in the Market Place at Fine Fare Supermarket (38/42 Market Place - but long since ago that store closed). There are now many fewer stalls and nearly all the "characters" have long gone. Nowadays mostly the elderly still shop in markets- and they're dying off. No future! The roundabout outside the Brewery (junction of London Road/St.Edward's Way) needs much better traffic management. Too much traffic for it's current outdated design. North Street looks increasingly "tatty" an a poor advert for those driving into central Romford. Rarely go there - who does? Central Romford is going downhill and is becoming "another Ilford". In our town centre are rough sleepers, beggars, boarded-up shops, too many charity shops, too much traffic and frequented by too many ne'er-do-wells and hobbledehoys..</p>	Noted
Local Resident	<p>Sentences redacted due to offensive nature</p>	Noted.
Local Resident	<p>"I attended the council's display stall in South Street a few months ago which was showing ideas for improving Romford. The people running it didn't appear to have much local knowledge. I mentioned the crime and antisocial behaviour which was happening even while we spoke. The Police were attempting to talk to a suspected shop lifter who was shouting and screaming. There was someone smoking skunk right next to us and a dreadful noise from a very bad busker. There were several people hassling shoppers to sign up for charities. I've often seen shoplifters selling hauls in the street. The person I was talking to didn't seem think any of this was a problem but I'm</p>	Comments noted. Please refer to section 3.3 of the consultation statement for proposed

	<p>convinced that no improvements to the area are going to attract more shoppers unless they feel safe and relaxed. I personally have to walk through South Street regularly to and from the Station and I do not linger." I thought it all looked nice but I would prefer to see the area more peaceful and with less crime etc. It looks nice. Assuming you asking about transport, whilst waiting for a bus in Western Road. I live off Collier Row Lane and have a good choice of buses but they're all scheduled to arrive at the same time. At night we wait 20 then 4 arrive. Years ago (the old) London Transport claimed this is so passengers can transfer from one to another. This of course does not work. If you happen to be on the last one you have no chance to get off and run to the first one. This was the case 30 years ago when I was a bus driver and now under TFL it hasn't changed. This occurs right across London. The services would be improved if they were staggered. For many passengers who have a choice of buses would then only have to wait a few minutes. Even if they have to change en route. The local hospital and GP services are overwhelmed yet we are building thousands of new homes to encourage more and more people to move to Romford. The Elizabeth line was built to take the pressure off Tube services, especially the Central Line but now they are both packed. I'm not sure inclusivity. There was a time when young children were not entitled to sit if older people were standing. We had to offer our seats to elders. Now we're old, we have to stand while children are encouraged to sit. It would be nice if the signs regarding this would be reinstated. Apart from that access seems to be much improved for wheelchair users etc. I feel there are too many shops selling unhealthy food which also create rubbish. Shops that are money laundering set ups and 'employers' of slave labour of illegal immigrants.</p>	<p>changes on these topics.</p>
<p>Local Resident</p>	<p>Yes a big issue is the dirty streets in the markets and surrounding area homeless people in the walk through the old Debenhams The homeless sleeping in marks and Spencer door ways and outside the south st doors The amount of pigeons in the old Littlewood building The rats seen in the walk way between littlewoods and Debenhams Security at the Liberty and mercury shopping centre'sThe old fashioned outdated market selling inferior items mainly fruit and veg. The master plan seems fine but these ideas need to be thought out especially security and cleanliness of the whole area "Yes landscape is very important but again UPKEEP by the council seems to fall by the wayside Planting tree plants flowers great but who will maintain them Open spaces who will they attract The council should now not allow any religious groups to spout their beliefs and harass the public No street canvassing Have a designated area for Music and only licensed music to be played" "Ban all E bikes and food delivery drivers to ride the area or restrict the speed Put on more craft and special Food markets and social Events" "Yes as I have previously said it is ok to Promote things but long term accountability for upkeep of the cleanliness and maintenance of plants and trees and rubbish more cameras" Make sure it is maned by security 24 /7to ensure peoples safety and wellbeing "Try to keep a old character but bring in Modern ideas to appeal To young families and shoppers" Use the areas for events invite organisations to put on presentations promote their community and trades Get more sponsors to sponsor say a tree or big garden centres to donate plants for free advertising Get local schools to put on concerts "Yes modernise make it more continental advertise on Radio to make modern town set up Volunteers to help keep the place clean that's one of the big problems Dirty areas such as Debenhams's littlewoods RATS and Pigeons Make it a fine for anyone caught feeding them" A busy road and an important part of the life of the market Up date the carpark Close off certain parts and better lighting at night give the station a face lift making it look cleaner and better for the town This could be a wonderful walkers place make it more friendly inviting and a nature reserve If the library is to have events that would bring in revenue Get guest speakers to when their books are published music events Again security North at st present is a mess with the building work going on what is going to happen when people move in all the flat db The town hall should be scrapped and maybe offices rented and the site used for recreation and sports would bring in lots of revenue Need tidying up a lot "More needs to Be done my priority 1 the Debenhams littlewood sites be demolished Or cleaned up from the rats and pigeons 2 landscape the market but put a good maintenance programme on order 3 Modernisation of the market stalls 4 stop all cyclist on E Bike fro riding in the centre 5 More security and police presence have maybe a mini police office 6 tidy up And clean the station area so when you leave the station it's look inviting"</p>	<p>Comments noted. Please refer to section 3.3 of the consultation statement for proposed changes on these topics.</p>
<p>Local Resident</p>	<p>Romford is a very historical town and councils have never taken advantage of this, so that's what we should encourage and respect It's a sticky plaster as always, no long term considerations Don't over build and pair back We are over crowded as it stands</p>	<p>Noted</p>

	<p>so building more health services just over loads our other services and hospitals "Yes think longer than council terms think longer than you terms in office. Be considerate of our children and grandchildren" As I've said before consider our very brilliant history in Romford and Hornchurch and Upminster build on that and we could build up a tourist industry which could bring in millions to our communities Don't be selfish and stand up to your voters, they got you in that position. Historical area needs to be protected Historical area It's been ruined and needs redeveloped as a brewery bring in independent brewers and develop a area for food and artisan independent craft producers Clean it up Pretty it up, ugly site Independent shops high quality shops It's become a getto a no go area I have no doubt nothing will ever be listened to, which I find so frustrating.</p>	
Local Resident	<p>Concerned about the loss of parking such as the brewery. Concerned by the loss of parking Concerned at the loss of parking</p>	Noted
Local Resident	<p>"The vision sounds promising. I'd like to know what is happening with the existing Debenhams building, the last occupants were a disaster. And the Littlewoods building that has been empty for I can't remember how many years. We need a way to entice good shops into the area at the moment I no longer go out to the market place or use any of the shops around it as it's absolutely sole destroying just to walk out there. It just makes Romford look run down. What happened to the vision on the wall of the liberty about the covered are leading out to the market place? The pictures looked great, but it never happened. If you are talking yet more housing, what are you going to do about the size of the hospital. When Oldchurch closed and Queens was built it was much smaller to start with, now with more and more people it just isn't going to be fit for purpose, it already isn't large enough." "I've read pages 37-43, but this is more of a history. You comment on us being one of the only places with a continuing market, but coaches used to visit at Christmas, they don't any more. The market should be a hub for the borough, but what are we doing wrong? Farmers markets thrive in lots of towns with good produce and interesting stalls. Towns like Birmingham have thriving indoor markets, I hope we are going to use some successful ones as a guide for what we are doing." "The space and landscape section reads well with some good ideas. I hope that this will include better playground areas for our children to play in. Ours look dilapidated and run down in comparison to that of local borough Brentwood. Here the floor is completely covered in a safe soft surface and the equipment is exceptional. Take a look at Brentwood Park or even the little community play space on River Road." "Again I didn't find movement and connectivity on page 60. Eventually found it on page 68. Its only any good changing for my walking and cycling if people can easily get to where they want to. At the moment bus services don't have fast direct routes and taking 3 buses as an option to using the car, just isn't one. people lead busy lives and just don't have the time to go by bus. Therefore the car driver also needs to be considered. The cycle lane put in going towards Gallows corner many years back causes traffic congestion and I rarely see a bike using it! I agree that the arrival gateways need improvement and an approach on Exchange Street would work, but only if welcoming and well lit. Improving the bus network to the hospital is positive, but not if again it takes ages to get there. I don't think we are anywhere near the time where active travel will overtake the use of cars. The journeys across the borough just take too long by public transport and some people may turn to cycling, but not enough to outweigh the cost. I do agree that car parking should be removed from the market place if you are going to make a viable proposition of the changes you want to implement there." "This is on page 69 not 76. The ethos and goals sound promising, but not sure that it can be delivered, certainly not by 2030. I feel there is a possibility of this being very costly even though in principal I think the idea is a good one "Again page 70 not 88. Open spaces where walking and cycling is fostered is a good one. Cycles can be used safely as long as the cyclists have and obey some rules. At the moment the motorist seems always to blame if an accident occurs, but on the road cyclists rarely obey the rules: they don't stop at lights and show no awareness of pedestrians crossing the road. If it's to be shared space then strict rules for pedestrians having the right of way first must be in place." "Again page 71 not 92. Yes I agree there should be continuity in character and building, but we need to be coming away from the high rise blocks. WE are beginning to look like a mini Moscow! We have to be very careful here that we do not put in more housing than the infrastructure can cope with, we are already struggling for doctors, dentists and hospital places to name but a few. You need to be very careful if redeveloping surface car parks. If you are not replacing these car parking spaces you will not encourage visitors to come to the town. This will</p>	Noted

	then affect the traders. Stick to the plan of low rise. The consideration of 6 stories or more should be completely vetoed. Children should have access to a house and garden, not be stuck in a high floor flat." "Page 72 not 100. I agree the retail offer should be improved, but we don't need lots of cheap run down looking shops, we need something appealing. It would be great to have somewhere that can be used as an evening venue for eating and maybe bowling etc. But you then need to consider where people will park their cars near to the facilities as people don't like to walk along dark streets at night time.	
Local Resident	love it, well done. BUT THERE MUST BE MORE PARKING ESPECIALLY BLUE BADGE theyre good need blue badge parking can only get better...admire your lobbying efforts.. go for it. urgent blue badge parking "i feel quite panicky about possible shortage of blue badge parking everywhere. No blue badge parking, no trade."	Comments noted. Please refer to section 3.3 of the consultation statement for proposed changes on these topics.
Local Resident	The 60s build too big with abestus It's a hundred years so the return of George Town for now and for the future with that architecture , like the golden lions door, Laurie town in that style was knocked down for the ring road , but Laurie hall is back - so smaller shops that family business can survive with various restaurants. A new or refurbished department store - no one's poor - good goods with normal sales . Again seating areas for lunches near pubs and cafes plus just free table and benches to but take away from the market 1200 year history. Good on the homes - too many flats - Homebase looks like it's going with their new parking ? "Have not seen it - but as long as residents are safe think you need zebra crossing or lights half way on the ring road - do not feel safe on the subways which could be put to better use. As we as redis dents have not be informed directly it does not impact but the shopping centre and new housing already there. Beauty safe and practical" Again easy to maintained for the council men and gardeners. A George Town Yes - you cannot charge more council tax we are the highest you need to get the building for homes done and get your council tax in. The market is protected but needs areas of seating - so they can carry on - and parking on days they are not there. So nice areas in the corners plus the C of E congregation . It is needed. Roger reeds and you have a bud depot there - depending what the council space the rc church is using and what is going to be build by the space sold by the church. You could put permittant loos for the bud men plus a coffee hut for them. There could be a corner shop for the locals roger reed and for the bud stop people not going into town. You grew plants on the bridge before that was nice. Perment cleaner on that site and a Sia on hôtel s. They been waiting for years for the flats to be finished. Looking forward to it.	Noted
Local Resident	"It's great that Romford's historical background is recognised. I think it's important to recognise that not everyone wants the responsibility of a mortgage, and that a mortgage is beyond the accessibility of everyone. Therefore it's essential that social housing is provided. Furthermore, this housing should be available to ordinary working people, who don't necessarily have major health or social issues. Just ordinary couples who would like to live in a council house. People who go to work and could pay a reasonable rent. The council would get income as these people would not be on benefits? Currently, this is beyond the reach for most people." No further comments Sounds ideal Good ideas. This is essential for the future It's necessary to provide good quality healthcare. It would be wonderful to regenerate the market Please remember that not everyone has a problem. There are also just ordinary residents who are still living with parents as they have no opportunity to be given social housing.	Noted
Local Resident	You want to spend millions making Romford look pretty wouldn't you be better off looking after your residents first?	Noted
Local Resident	I would prefer more participation events like the availability of taster cuisine to sample different flavours from food outlets and a fairground like atmosphere once a month at the market place with traditional rides and games activities mixed culturally aware activities like dance and some dressed up characters live bands with instruments a piano for some much needed entertainment daytime fireworks enjoyment park nature walks days for bike rides at the parks on hire for the hour bikes I have no comments on Romford Master plan consultancy as the politics should be put to one side for once	Comments noted. Please refer to section 3.3 of the consultation statement for proposed

	<p>open up people's wallets yet by only putting more money in their pockets in the first place Yes treat it less like an exam and more like studying I move a lot yet I became poor from budgeting excuses I cannot be put in a flat with no parking with nowhere else to go or enjoy I want to enjoy the differences not the same No I pay my bills like most people for not much in return I do not need reminding of how difficult everything is going to get...again Yes get everyone else back to work so I can finally enjoy some leisure The history is nice yet not many historical updates for the future Yes quality street? Or Roses?? I know from experience that a recession causes a recession and if I cannot spend and save money at the same time would I spend any money at all The market place had most of the original cobbles stolen from previous improvements someone likes to make on someone else's break take horse and cart rides up and down the market place keep roasting chestnuts have candy floss and fudge and coconut ice have a curry in a hurry and waffles ice cream and crepes and pancakes Whatever Way The carpark waits longer than I do for improvement The trains are great my freedom pass gives me the freedom not to have one paid by the council anymore The fishing would be good apart from the council flounder The guidance should be to give people money to spend in the first place before entrances have cash splash The eateries are comically cheap improve the quality To build less flats and more leisure type facilities The main comment would be more jobs less work and paying people for results rather than failures</p>	<p>changes on these topics.</p>
<p>Local Resident</p>	<p>"I think the clubs on Romford high street bring so much trouble to the area in the evenings and weekends. I feel if the bars and clubs weren't there, or at least closed earlier, the area would be so much nicer. I also feel there are far too many car show rooms on London Road, they could easily be made into residential new build homes. There are almost 5 car showrooms all within a few meters of each other at 144 London Road. It's ridiculous, unnecessary and bad for the environment." I feel the master plan is a good idea. No, it is a good plan I think the amount of car shows near 144 London Road is unnecessary and doesn't help sustainability. I stress the amount of car shops/showrooms on London Road is unnecessary. They could easily be turned into flats which would be better for a green environment.</p>	<p>Noted</p>
<p>Local Resident</p>	<p>I like reopened the river. But please we need better segregated cycle routes into Romford. Young generations don't want to drive or rely on buses so you need to build these cycle routes now. More segregated cycle routes More segregated cycle routes More greenery. Removal of the gyratory. O" This needs a segregated cycle lane for the length of it.</p>	<p>Comments noted. Please refer to section 3.3 of the consultation statement for proposed changes on these topics.</p>
<p>Local Resident</p>	<p>Sounds like meaningless babble Too wordy and airy fairy All rather theoretical Should be less emphasis on cycling, which is a minority activity, for the fit and mobile and not applicable to nearly all the elderly- who want cars and buses. All sounds disconnected from everyday life in Havering no Central Romford is a dump and needs radical changing- with the market closed once and for all. No The area may not recover for decades from the closure of Debenhams As I said above the market should be closed once and for all. It is full of tat and barely 40% occupied, creating a very bad impression of the area. The station is such a dump, which I suppose is not Havering's responsibility, but the entrance and surrounding area is also tatty, so needs drastic improvement. The river should be boxed over totally and forgotten about. demolish Mercury House Another dump, mish mash of dodgy looking trashy businesses, and traffic jams. "It is time for the Town Hall to be used for public services again, not a cosy retreat for Members. Open enquiry counters for Council Tax, Planning etc with staffing not Internet." Avoid the place. "The document is FAR FAR too long and written in consultant-speak, which comes across in so many places as meaningless babble. It is to pie in the sky, and la la land. It seems to contain few meaningful proposals, but lots of aspirations many removed from what Havering residents feel or want. Instead of a vague wish list, it needs a single page of true proposals and funding details. Romford as it is, is even worse than it was when I got to know it in 1985. It is dirty, dreary, unfriendly. The roads made by the Council are a mess. The ring road is a disaster, the town will not ever recover while this awful thing remains encircling it, strangling it with pollution. I cannot name ONE nice, good thing in Romford. Stand in the marketplace of an evening and you are in an urban horror film complete with drunks and foreign thieves."</p>	<p>Noted</p>

Local Resident	Scrap all plans and focus on making Romford a place to go to. I can only assume after so many sections on your list of comments people eventually get bored and can't be bothered to respond..	Noted
Local Resident	This is a good vision, but needs to be something that meets the needs of local people - don't seek to be too upmarket with "refined" retail. We still want market stalls that offer cheap clothes, fruit, veg, meat and fish, rather than artisan produce which many local residents cannot afford. In general, this is a good plan, with consideration given to the environment and the future of the area, which does need redevelopment. I am worried housing developments will be too dense, but appreciate it housing is a very challenging issue, given the need - please ensure local authority housing is prioritised over "social rents" etc.	Comments noted. Please refer to section 3.3 of the consultation statement for proposed changes on these topics.
Local Resident	All the blocks of flats and offices are too tall and will create an oppressive environment. "Blocks of flats and offices are shown where there are presently car parks - this is a retrograde feature and should be changed. Existing car parks including those recently closed should be re-instated and additional ones developed." All the blocks of flats and offices are too tall and will create an oppressive environment. "Blocks of flats and offices are shown where there are presently car parks - this is a retrograde feature and should be changed. Existing car parks including those recently closed should be re-instated and additional ones developed."	Noted
Local Resident	"I want to see a town centre that enhances our heritage of older buildings, not concrete boxes with no style. I do not want additional homes built in the centre of Romford, the town centre should be designed for shopping, socialising, market (expanded. see Norwich city market). Housing should be developed on old industrial estates, out of town shopping centres that aren't doing well financially. The town centre be designed to look old, but with modern facilities. We need another cinema and the High Street needs to be redesigned because at the moment it is run down. We need to keep all the existing parking and the public transport needs to be improved. I suggest a tram service circuiting the borough would be advantageous. The land next to Queen's Hospital has been abandoned for many years, build homes there. It is close to the centre of town to make it viable. We do not want the centre of Romford destroyed for profit." As above A landscaped open space in the centre of Romford would be good, but it should include seating, a cafe, toilets and a young children's play area. We do not want it to be an area where homeless people congregate. The council must do more to help homeless people. Two bus station would be advantageous, and the bus stops could be removed. Keep fast food to a minimum and tax them accordingly. It must blend in with the existing town centre. It must be for local people, your council tax payers. Tax large businesses more, but not smaller traders. Copy Norwich market. Go and visit it to see what it is like. Demolish the car park and create a cinema, theatre and community centre. Self financing. Leave it alone. See comments re buses Build homes there. Expand it tastefully. Demolish mercury house and replace it with a health centre. Make it a pedestrian precinct Build housing	Comments noted. Please refer to section 3.3 of the consultation statement for proposed changes on these topics.
Local Resident	Yes, we need to preserve and expand the market so is to go destination. Place to meet friends, go to food courts and buy fresh, local products, urban gardens. Romford Shopping Hall - convert it into food market, food court. Market square - place to meet with friends please see how canary wharf "I dont agree with CT6 - we dont want 6 storeys building in city centre. I would like Romford to keep village character and I would not like to see building higher than 2-3 storeys in the city centre (current Brewery parking) so they fit in overall architecture." 5.7.27 - we need to make sure we have enough GPs and hospital big enough to serve the population. This shall be must have for this project to start." "6.4.21 The building here are too tall. They will look horrible and take all the light. These shall be max 3 storey building to keep village character of the town." Yes, we need second entrance to the station and there is almost ready infrastructure for that. "6.9.3 - we shall not build nothing higher that 6 storeys there. Please do not build skyscrapers in our town" "Please preserve village character of our town. Please do not build skyscrapers. Please make sure our town is clean, as now it is not bad, but it is so dirty that no one wants to come here from central London or invest in shops. The council cannot even keep it clean now, not sure what will be later."	Noted
Local Resident	what do you mean by "refined retail offer" please provide specific examples? How realistic are the objectives? Consider connecting superloop bus route ensure open spaces are frequently patrolled and don't become crime hot spots Support local business Needs to be de-congested Use to build more flats	Noted



Local Resident	<p>As a resident of Havering for more than 30 years I am pleased that Romford is looking to regenerate and hopefully secure a future of growth and sustainability. Shopping habits have changed and unfortunately many of our larger shopping outlets like Debenhams have closed. I feel that it is important for us to retain stores like Next, M and S, Primark, H and M and other popular outlets. The liberty offers a bright, clean and safe environment to house these shops. Keeping this environment and presence is vital. Romford Station has been modernised but as soon as you walk outside of the station you are greeted with a dirty and dingy pavement. This area needs a complete refresh and if there was a way of creating a street food market in the area in the pedestrian area between the station and the Golden lion pub that would offer something new and centralised. The existing market area looks sad as stall numbers have reduced. It would be better to reduce the market size and perhaps introduce a staged area to host events and showcase local talent. Creating a green space here too so that children can play whilst parents enjoy a coffee would be great. Parking is important. Free parking would encourage footfall. See my previous comments There are great transport links already. It's very congested around the station. There needs to be a safer landing area for people getting off buses. If the area outside of McDonald's was to be resurfaced and cleaned up this would create an opportunity to link into my suggestion of a new outside food market/area in the area behind the back entrance to M and S. Solar lighting. Recycling bins. Perhaps climbing walls made from recycled materials. Green areas in the town centre are important. These need to be integrated, sitting alongside cafe areas. I want to feel proud of the history of Romford. It would be great to have pictorial around the town centre to capture and show this off! Need to support retention of businesses and give incentives for new businesses to start to using short term lease arrangements. Romford shopping centre needs to be able to compete with neighbouring centres. We have a large population. Incentives to shop locally and holding free celebration events is essential. Publicity of these us also fundamental to drawing in public. People need to feel safe. Also as we have an ageing population we need to create areas for people to sit and rest. Pavements need to be clear of unnecessary obstructions to allow full and clear access for PWDs.</p>	Noted
Local Resident	<p>This may not work if the car parking fees are too expensive. It all looks lovely Love the walk ways Opening up the river Rom sounds attractive Sometimes I would have like Romford to have been left as a quaint town but know this can't be done so I don't think much of the character to the town will be left. But saying that having more green spaces would be good. Do you honestly think smartening up the town will bring down the economy. If I ask my friends they seldom go into Romford but go to Lakeside for the choice of good shops, no traffic, no car park charges and food all under one roof. Hopefully this will smarten up the road but a bit out of the way for me Would be good if this became a pedestrian walk and if this happens eating outside the shops would be fun Looks interesting with greenery and trees Can't understand how this affect people and the economy of Romford "I do like the general outlook of the new building and modernisation of Romford but hopefully the traffic roads will be better to cope with the parking. Like the idea of more greenery and trees etc. Somewhere I would like to come to lunch and coffee with friends. Also it would have been good if everytime you asked a specific questions about an area and you quoted pages you could have made it possible to go to the that section to re-read as the plan/survey was so long it was hard to remember everything."</p>	Noted
Local Resident	<p>Please leave Romford as it is as previous parties have made a mess of redeveloping over the years and all it achieves is loss of history and heritage. We the public lose out past and convenience due to wrong plans which most people do not want. Councils of all colours seem to want to turn Havering into Ghettos . scrap them and leave things alone leave things as they are no point having a view as Councils have already killed any character in Romford Money could be better spent on important issues Councils do not appear to listen to the public they just make thing worse with by blundering on</p>	Noted
Local Resident	<p>A good vision, but much of it lies outside the scope of local authority influence. They are strong but could be in plainer English and be more accessible. Quite visionary, but I doubt that the detailed objectives and plans could be completed successfully, and I think illustrations and comparisons are misleading. There is extraordinary continuing cost and commitment in developing and maintaining new spaces and new landscapes, both built and green. Again, I cannot see the Rom regeneration happening straightforwardly, and therefore that axis is unlikely to thrive. Good objectives. There isn't sufficient attention to the radically changing needs and motivations of the most recent cohorts of young people vs. the needs of the 60+ older generation -- the Plan</p>	Comments noted. Please refer to section 3.3 of the consultation statement for proposed changes on these topics.

	<p>has a rather Polyanna / optimistic view of these being compatible, but the present usages and attitudes suggest they may not be. "A great deal more could be done, and at low cost, with private owners' consent, to effect a more attractive and coherent townscape -- e.g. facade and decoration work by the Borough to private premises on the marketplace, in South Street and High Street. It should emphasise more strongly Romford's wealth of suburban-Essex ""cottages"" / small houses, especially in the Victoria Road surrounding area. These are a remarkable survival and should be celebrated." I hope Romford can attract the mix the Plan aims for, but the detail is ultimately out of the Borough's control. At present, Havering has allowed (because it has little option) the rise of many similar usages / a sameness not mix. This is well written I doubt this will work and stay attractive. It is too piecemeal and fragmented, and no longer has much real market. It seems far too optimistic unless Havering has a considerable budget going forward for maintenance and continuing development. no comment I think the Brewery buildings should be retained. They are not especially unattractive viewed from the railway and they contain good retail and leisure facilities. Creating a new Rom River area is unlikely to yield the results you illustrate and suggest, despite the huge money involved. Retain the Brewery and devote the money saved to other projects. This ignores most of the aesthetic problem round the station, which could be radically transformed without much money. The second station entrance is a good idea with such a huge amount of new housing proposed in west Romford. As above. Sensible. There could be a more thoughtful negotiation between Liberty and Mercury in the Plan, to create more distinctive identities and uses - one retail-focused, the other leisure- and community-focused? As before, negotiations with private owners for borough intervention could make vast improvements at relatively low cost. It's silly to bring back Laurie Square as a name: it's not a square, and it won't look like the old destroyed Laurie Square. Find a more contemporary description? Hopefully improvements would increase the use of the Library. However, most of the Town Hall site seems empty now, with very few staff, so perhaps a more radical solution could be found? No "I believe that Havering can transform Romford at much lower cost, and with much lower continuing maintenance costs, rather than initiate some of these grandiose schemes, but still pursuing the valuable objectives. The climate for local government has changes: Havering will never again have sufficient funds and personnel for these projects and their upkeep. I worked in Planning &amp; Economic Development in west London in the golden years of the late 1980s when we redeveloped two town centres in a borough: the civic and corporate worlds have altered so much since. I think the Masterplan should be made realistic, so that it can be achieved."</p>	
<p>Havering Volunteer Centre</p>	<p>"There seems to be a lot of housing development and whilst the plans looks great in reality will it look like this? There will be residential housing in the middle of businesses and shopping experiences with no parking, no major infrastructure and no support for the voluntary sector hubs. The market was iconic and a destination point, we need an injection of good quality market stalls, appealing to all demographics, easy access and personality. Currently the market is dead and lifeless, despite Romford BID trying exceedingly hard to rejuvenate this. We need community buy in and having a lot of high rise buildings where people will live may not make Romford the destination point it once was but rather a travelling through and not a place to spend money" "I think there needs to be more pocket parks and green spaces, if this was more like the Olympic park and surrounding areas this would have a more open and inviting feel. However, we are limited on space so it wont feel as open and airy as the Olympic Park area. The walkways between areas to make connectivity need to be well lit and safe - one of the main evening barriers is safety lots of elderly will not travel in Romford at night because they feel unsafe. The High street is very dark and dingy and I know from the plan you intend to make this pedestrian and more connection - this needs to be well lit, pocket parks, green spaces and places to sit and enjoy nature in a very busy town. You talk of inclusivity and more cycle ways, please think about the visually and hearing impaired who already have trouble with Uber drivers, bikes, e-scooters and now more cycle ways. How inclusive are you being to those with sensory impairments, physical disabilities and learning disabilities. Please do not just use buzz words because it ticks boxes tell us how and not just cycles ways. Totally agree we need an early night time economy - family friendly where you can go for coffee, bite to eat that is not a pub or expensive restaurant. You do not explain how you are going to champion the market place, we have said for many years, we need smarter market stalls, colour co-ordinated. Perhaps a roof similar to covent garden or borough market these are destination points and if Romford were like them offering good quality food,</p>	<p>Noted</p>

	<p>clothing and artisan products Romford Market would once again be vibrant. Having no parking in the Market will be a great step forward and the vision of the 5 year plan if doable looks remarkable. Sadly I cannot see a great deal for the High Street, we have a lot of voluntary sector organisations currently housed in High Street, it appears the High Street will be used for other purposes, I'd like to know where you are going to place the Voluntary Sector as it would be highly beneficial to have VCSE all in one street/place so residents needed support can access many opportunities all at once."</p> <p>On the surface it looks great, how is it going to be maintained, developed and established. Greenery grows and will need to be maintained, currently the voluntary sector host community clean ups, cut greenery, keep the highways neat and tidy when the council cannot, clear gullies and drains to enable surface water to run away freely. If you cut the VCSE you will lose this good will, volunteers will help with the maintenance of the greenways but they need supporting. "think about those who are visually and hearing impaired, lots of cycles will cause alarm and distress to those with sensory impairments, learning disabilities, dementia and physical disabilities. Whilst it looks good to have cycle paths but if this is in a pedestrian area it will cause problems."</p> <p>"all sounds great but circular economy greenery all needs help from the community and voluntary sector to make it happen is this factored into the master plan, how is the VCSE going to support the council with no funding! Romford is full of rats and on a daily basis I see at least one, how are you going to tackle this problem with more greenery for them to live in! currently High Street is plagued by rats and they are eating through concrete, cables, walls, etc with more greenery you need to tackle the massive rat problem. Road sweeping and emptying the bins. "all the comments made earlier, lighting, safe space, family friendly, sensory friendly - raised lettering signage diversity is much more than just culture it encompasses everything aspect of the individual regardless of background all this will make a better healthier wellbeing outlook its no good having green spaces if you have crime in the area so we dont feel safe, rough sleepers on benches and in doorways, how is this going to increase health and wellbeing if women do not feel safe on the streets, St Edwards and St Albans was the worst London borough for sexual assaults a lot of work has been done to reduce this but its always there and having greener spaces is not going to stop that if crime is not being dealt with" no mention of the High Street??? what is happening along here need more flexible working space, voluntary sector hubs think about your community and how we can support them all from one place - makes sense you have to make it worthwhile for people to come to a destination - 40% more people will walk to a high street shop if there is something for them to walk too. Currently Romford is not appealing and by talking away some retail space its narrows down what people will walk to "you have to modernise the market, bring the stalls up to date and make a feature. it needs to car free. no parking. greener space more seating, somewhere to eat lunch rather than going to cafe or bar" "sadly it looks like High Street will become a link between St Edwards Way and High street with some buildings being demolished to make way for a link between the two Not sure this is a viable option when you already have north street available&gt;???" I am not sure about the housing development when we need more retail to bring shoppers into Romford will the public be able to use the building more - currently the building is empty, heating on and skeleton staff - why build a new campus when the old one is not being used to its full potential "asking so many questions I lost interest, I have lots of comments to make but not enough time to answer them all Id like to know about the consultation, who is conducting this and how much does this cost I remember the last Romford Market consultation plan and the cost involved in that but no outcomes and consultants paid and nothing changed. We are in a dire strait at the moment and we need to save money I hope this was factored in when the consultation was put in place."</p>	
Local Resident	<p>"Yes Sell off the Town hall and build new affordable homes. There are plenty empty offices in Romford and the Town hall can be done up and used for weddings ect. or even shows with the venue being a fantastic back drop for for plays." See Above. "We have the worst Market in the county just go to North Weald on a weekend and go to the markets in Europe. Romford Market as been going down for years and used to be one of the best markets around. I also think consideration should be given to what stores have been coming and going since Debenhams had moved out the council had the chance to have some big names come to Romford but they only know why they would not let them in. You should be ashamed of yourselves. (You know what I am talking about)"</p>	Noted

Local Resident	N/A Would be really interested to push for the north-south rapid transit system through the town centre to enhance local connectivity.	Noted
Local Resident	<p>Superficially it reads well, albeit its somewhat abstract. I would have preferred a more realistic plan rather than an aspirational plan, led by intelligence and data rather than nostalgia. For example I'm struggling to understand the basis for making a rejuvenated market' the core of the plan. Everyone in Romford would like to see a successful market but I think committing to that is setting up to fail and ultimately it misleads the public. If the market was that easy to solve and improve, it would have surely be done by now. The plan makes no mention of how the market can be improved and/or the basis for why suggested improvements will work. Modern societies rarely shop at markets. They tend to only work in specific locations and/or when selling specialist or niche goods. Romford market has been in steady decline for years. The people may like the idea but none of us actually use it! I fear LBH will plough money into a project which is doomed to fail and this would be reckless. What reliable data or evidence suggests ht market can be saved? If there is none, be honest with the public and tell so our taxes aren't wasted See above Support the proposals Support the proposals. Like how Romford town is designed to be connected by foot and bicycle Support the proposals although I'd like to see the vision being even bolder on sustainability Support the proposals Broadly support the proposals save that we shouldn't blindly cling on the past or ideologies which don't serve Romford or its communities. Not enough reasoned detail or examples on the mix of uses and how it can realistically be achieved. For example how will offices be enticed back when lots of premises have already changed use? These won't ever change back. Where are the offices going to be? Please see my opening comments. I can't find a justified reason for wanting to save the market other than for nostalgia purposes. Why persist with an idea if it isn't going to work? This isn't a good use of public funds</p>	Comments noted. Please refer to section 3.3 of the consultation statement for proposed changes on these topics.
Local Resident	<p>"I think the vision should incorporate the following initiatives: 1. Address vacant properties: Benefit: Maintains area vitality and prevents the perception of decline; 2. Implement temporary uses for empty storefronts (Designer Sample sale stores or Art Gallery); 3. Public art installations by local artists: Benefit: Enhances visual appeal and supports local creative community; 4. Landscaping and greenery: Benefit: Improves aesthetics, air quality, and creates a more pleasant shopping environment; 5. Improve parking options: Benefit: Increases accessibility and convenience for shoppers, potentially boosting visitor numbers; 6. Diversify tenant mix: Benefit: Attracts a wider range of customers and increases overall area foot traffic (Costco or an Ikea would be beneficial); 7. Street fairs and festivals: Benefit: Drives periodic surges in visitors and creates a sense of community; 8. Live performances: Benefit: Provides entertainment, attracts diverse audiences, and extends visitor stay duration; 9. Create a cohesive brand for the area: Benefit: Establishes a unique identity, aiding in marketing efforts and customer recognition; 10. Tax breaks for new businesses: Benefit: Attracts new entrepreneurs and encourages business diversity; 11. Grants for storefront improvements: Benefit: Enhances overall area aesthetics and encourages property investment; 12. Rent subsidies for desirable tenants: Benefit: Attracts specific businesses that can serve as anchor tenants or fill gaps in local services. This vision combines strategies to improve the area's appearance, increase visitor engagement, support local businesses, and attract new enterprises." "Economy is key, if an environment of economic aspiration is created in Romford there will be more of an incentive for residence to contribute. Business owners making a difference in the community should be celebrated while more workshops supported by the council to encourage the younger generation to implement their ideas into innovative start up companies." "Blue strategy of re-establishing the River Rom should be financed by private real estate investors who will invest in the development of Residential real estate. Council should ensure the requirements for the Blue strategy are clear so they are incorporated when providing planning permission. The Kings Cross canal corridor should be an inspiration behind this development. The Romford Brewery pillar should be redeveloped to include a viewpoint at the top which can host dinners or parties for the borough's affluent contributing to the local economy." "The introduction of a new entrance to the station is a good suggestion but should be considered after modelling the potential increase in passengers. Reducing car lanes on the Ring road feel non-sensible as the current congestion is only going to get worse with the increase of</p>	Comments noted. Please refer to section 3.3 of the consultation statement for proposed changes on these topics.

	<p>residents to the town causing further delays for people commuting to work/schools during rush hour." Greenery should be incorporated and inspiration taken from initiatives in Singapore Green plan 2030 can be a source of inspiration. "The only horticultural activities in Romford is the Romford Small holding society on Oaklands avenue. The society is over subscribed and has a waiting list that is not reducing. A number of new Horticulture allotments should be incorporated in the plan to enable aging populations to secure plots keeping them fit and healthy while combatting loneliness and ensuring food sustainability." "Romford is a Market town. Local artists should be commissioned to create murals or Art pieces to reflect its history. Inspiration of the fourth plinth at Trafalgar square should be implemented in the Market square to create the Romford Citizen Plinth." "A matrix should be developed to categorize plans into Short, Medium, and Long term. Short Term plans should focus on implementing changes with minimal cost and quick turnaround. These ""quick wins"" will initiate progress and pave the way for more substantial changes in the future." A specialist Business college or education campus should be placed in the centre of Romford to drive footfall and encourage more footfall into the Town centre. "No mention of the developments of the barren land currently situated near the London Road and Waterloo Road Roundabout. Potential area to include horticultural plots." Potential area to include Horticultural plots. The reading of the material is quite long and a video should be created with the help of AI to engage with more residents.</p>	
Climate Change - Havering Council	<p>Would be good if something could be added about sustainability and green spaces. As this Masterplan covers such a long time period and Romford is Havering's biggest town centre it would be good to be highly aspirational, especially with the Council's own target of being carbon neutral by 2040. Could we add something along the lines of: Romford should set an environmental sustainability precedent for other local communities by reducing carbon emissions as far as is feasible and be designed to respond sensitively, and sensibly, to the inevitable effects of climate change. Would be good to be able to point residents and businesses to a good practice 'library', e.g. green roofs, permeable paving, rain gardens, to alleviate flooding.</p>	<p>Comments noted. Please refer to section 3.3 of the consultation statement for proposed changes on these topics.</p>
Local Resident	<p>Agree with the vision "MC1 - Agree, however the speed on the ring road is too fast. Cars regularly exceed the 30mph limit. In line with vision zero the ring road and surrounding roads ; should be reduced to 20mph with high levels of enforcement; MC2-MC4 – Agree; MC5 - Agree, the number of car parking spaces in Romford town centre is far too high; MC6 - Agree - but this doesn't track with Havering councils constant refusal with TFL to create more bus lanes in Havering; MC7-MC8 – Agree; SC1 - SC8 – Agree; IHW1- IHW4 – Agree; CT1-CT6 – Agree US1-US8 – Agree; E1-E8 - Agree"; Agree with these sections</p>	<p>Noted</p>
Romford Baptist Church (maps also submitted )	<p>"1. On Page 171 (of the whole document, numbered page 167 in the bottom right hand corner of the page) of the Romford Masterplan Final Consultation Draft dated 22nd August 2024, there is an area of land in red entitled "Aerial view - looking northwest", the top part of that diagram includes land that belongs to Romford Baptist Church. 2. On Page 175 (page 171) of the same document there is a diagram entitled "Fig. 115. Indicative street hierarchy, access and route networks" which has a red line called "Enhance pedestrian link between Main Road and Dolphin Approach", this area in question is land that falls within the boundary of Romford Baptist Church. 3. On page 51 (page 48) of the Romford Town Centre Masterplan Baseline Report dated 22nd August 2024 there is a diagram entitled "Fig. 40. Romford Policy Map", which has an area of land called "Brownfield Land 2009-2010" this land in question falls within the boundary of Romford Baptist Church. We did attend the Stakeholders Workshop and raise these concerns, was assured someone would be in touch but this never happened." "We are writing to express our concern over specific sections of the Masterplan where land that belongs to Romford Baptist Church has been included for development without consultation with ourselves. We attended the Stakeholders Workshop and raised our concerns at the meeting we were assured that someone would be in touch prior to this next stage but unfortunately we have not received any contact from London Borough of Havering. We have responded to the formal consultation but also wanted to formally state the ownership of this land and that it cannot be included in any subsequent additions of this masterplan. Stated below are our concerns: 1. On Page 171 (of the whole document, numbered page 167 in the bottom right hand corner of the page) of the Romford Masterplan Final Consultation Draft dated 22nd August 2024, there is an area of land in red entitled "Aerial view - looking northwest", the top part of that diagram includes land that belongs to Romford Baptist Church. 2. On Page 175 (page 171) of the same document there is a diagram</p>	<p>The Masterplan figures have been amended to clarify that there are no proposals to force change to land ownership, right of way or access to the Romford Baptist Church. The intention of the Romford Masterplan is to support positive changes in the Romford Town Centre with planning applications within the Romford Town Centre and improvements to public areas.</p>

	<p>entitled "Fig. 115. Indicative street hierarchy, access and route networks" which has a red line called "Enhance pedestrian link between Main Road and Dolphin Approach", this area in question is land that falls within the boundary of Romford Baptist Church. 3. On page 51 (page 48) of the Romford Town Centre Masterplan Baseline Report dated 22nd August 2024 there is a diagram entitled "Fig. 40. Romford Policy Map", which has an area of land called "Brownfield Land 2009-2010" this land in question falls within the boundary of Romford Baptist Church, please can you advise why this was outlined. We have attached copy of HM Land Registry document and plan title number EGL513193 which shows the boundary of The London Baptist Property Board Limited Legal Ownership, they hold the custodian Trustee Ownership on behalf of Romford Baptist Church. We have also attached copies of the specific pages from the consultation documents for your ease of reference. In addition to this we also maintain a right of way on the very edge south-west boundary of our property onto Dolphin Approach, the agreement of which is for 150 years (which was taken out in approx. 2007). I look forward to receiving a full formal reply to this letter a copy of which we have passed onto The London Baptist Property Board's Legal Team who will follow up in the event that the London Borough of Havering continue with the Romford Masterplan document as it is."</p>	
Local Resident	<p>This is a very good idea. Romford also needs joined up green spaces for wildlife and people. Cars have taken priority for far too long and people walking should have more safe places away from cars. Instead of community roads have divided communities in Romford. Only Romford hides its river in concrete, where other places celebrate their waterways and are better for it. It's a brilliant idea. We need more greenery. I hope there will be plenty of trees as I have noticed that the reality, when it arrives, often does not hold as many as the drawing did. Trees do not create more work they create shade in hot weather, homes for wildlife and combat pollution. Greenery enhances an area. More joined up greenery where people do not have to negotiate getting across roads would be a great improvement. In Romford you have to spend time walking up and down slopes and stairs to get around because of all the roads. It's time people got out of their cars and walked or cycled more, and they might if the surroundings were more encouraging. Too many roads and cars, too much pollution and this is not sustainable. How many people have tried to walk to Romford and found Gallows corner a barrier. There are no decent crossings there. It's one place where an underpass was obviously never considered. There are other routes but you still have to get across the A12, which can take a long time. We all know that green spaces are good for mental and physical health. In the new design market place there could be tables for people to sit and play games, to encourage community. Romford is totally lacking in that at present. Maybe the new plans could change that. You only get back if you put in. If it encourages more community and is a safe place then that is for the best. It's a beautiful old historic church and should be treated with respect. Make the river more accessible and stop hiding it in concrete. Romford took wrong turn when they made the ringroad. It's time to make big changes and this plan is a good start.</p>	Comments noted. Please refer to section 3.3 of the consultation statement for proposed changes on these topics.
Local Resident	<p>"Awful plan. Romford town centre is already too built up and saturated. The infrastructure is not there. The plan is lacking. Hospital issues are a big factor and can't be ignored. Having experience of Queens a few times in the past 12 months it's shocking. My 76 year old Mother in corridors on a trolley after a bleed to the brain for 3 DAYS! Romford/Havering needs more A&amp;E/hospital facilities." "Awful plan. Romford town centre is already too built up and saturated. The infrastructure is not there. The plan is lacking. Hospital issues are a big factor and can't be ignored. Having experience of Queens a few times in the past 12 months it's shocking. My 76 year old Mother in corridors on a trolley after a bleed to the brain for 3 DAYS! Romford/Havering needs more A&amp;E/hospital facilities." We need space and green but not then surrounded with towerblocks! Health comes under my infrastructure comments and we need more hospitals You've lost the character of Romford, you've allowed druggies in South st plus the anti social buskers and preaching blaring out from loudspeakers. No more flats!!! No more flats!!! No more flats!!! No more flats!!! No more flats!!! No more flats!!! "You've let Romford decline for many years. My comments about druggies and loud buskers. Sort it out. Too much building has happened and it's scary. Romford really needs more healthcare facilities, they've all shut. We need a bigger hospital and additional A&amp;E/walk in/clinics. So many more homes have been built but the infrastructure hasn't."</p>	Noted
Local Resident	<p>"With 5000 additional homes being proposed for this area it is essential that active travel is prioritised. The whole project will fail if this means 5 to 10 thousand more</p>	Comments noted. Please

	motor vehicles (plus extra traffic generated by delivery vehicles) based in the SDA. Fully segregated, safe, pleasant and efficient walking and cycling routes within the area are essential. As are such routes feeding in to it from Collier Row, Rush Green, Harold Hill, Hornchurch and all other adjacent Havering communities."	refer to section 3.3 of the consultation statement for proposed changes on these topics.
Local Resident	Excellent vision that I fully support. Agree and support. Excellent proposals Support, very important. Very important, support proposals If it happens, excellent. Looks good Opening it up will be excellent. Very supportive of this Proposals are excellent, hopefully I'll be around to see them come to fruition!!	Noted
Local Resident	The housing is excessive and inappropriate Before starting more building projects the existing ones should be completed More flats Market place should be developed now as a priority and efforts made to fill empty unit such as ex Debenhams and Littlewood stores This should be kept as a covered shopping hall and efforts made to market it This is main route for visitors to the town and is a embarrassment	Noted
Local Resident	Please see final comments: "I think it's very sad to see a number of superior buildings demolished to make way for a series of ugly, identikit, buildings that are inappropriately tall for the area. They will not only ruin the outlooks of existing homes, but provide miserable housing for tenants, with no views other than to look into each other's properties. Unless I have misinterpreted the plans, it would appear that the Brewery no longer exists. To remove a popular, useful, facility seems strange and shortsighted. Unless there is an enormous transformation of the South Street offering (and, indeed, an appetite from retailers to increase their presence in such a limited space), where will shops and entertainment be moved to - further out of the centre? It would also appear that there is a push towards removing roads and increasing pedestrian areas. Whilst, as a non-driver, I cautiously welcome the notion, it concerns me how traffic will be handled and where it will be pushed out to. The idea that people will stop driving, and opt to walk instead, is fanciful. Particularly if somewhere like the Brewery is removed and reaching a supermarket, or other facilities, involves travelling even further. Having lived here for a number of years now, I find that Romford struggles as it is to provide basic amenities for the population currently in residence. The proposed new facilities would likely only provide an adequate upgrade for the current population, I cannot see how many thousands more resident can be supported. Similarly in transport infrastructure. The new Elizabeth line is already full to breaking point during rush hour periods. It is simply unable to sustain a significant increase in passenger numbers. I fear these plans have been developed by those who do not live within the areas directly impacted, and will not feel the fallout. I fully appreciate there is a housing shortage, but these plans do not seek to invigorate the town, but simply push out those who have grown up here, or called it home for many years. Romford would certainly be transformed, unrecognisably so. But not for the better, in my opinion."	Comments noted. Please refer to section 3.3 of the consultation statement for proposed changes on these topics.
Local Resident	Romford is already an unsafe area the HRA have ruined a lot of it, shops closing and no go areas. All pie in the sky, has been turned down once before as unsustainable and impractical. I doubt if there will be any left by the time this council has built over Romford, becoming an unsafe ghetto. Only moving towards a 15 minute city which no-one wants. HRA controlled by the WEF and there visions. Totally unsustainable. No proper infrastructure to cope, all under pressure as it is HRA up to there usual tricks. The HRA has nearly got rid of Romfords character so this should see it off completely. Economics really don't come into it, the plan has already been decided and the costs will just be passed to the residents for more vanity projects for the HRA to say "look at us" The market has been ruined, not a patch on what it used to be and will never be the same, however much tunnel visioned councillors think they can make it better. As before and somewhat amusing. Leave it alone. "This ""Masterplan"" was drawn up before and it was decided to be impractical, unsustainable and unacceptable. Nothing has changed. The influx of people cannot be served by the already strained services ie hospital, doctors, schools, dentists, carers etc etc. Where is the infrastructure to support these plans. Romford is a no-go area to a lot of people I do not visit because of what the town has become and becoming. This masterplan will not have a positive effect on the town. We all know ""consultations"" are mandatory and are there to make it seem the results will have an effect on the outcome. The truth is, and has been seen in the past, these ""consultations"" are a smoke screen for what has probably already	Noted

	been decided. Still I am sure my replies will be designated to the bin, along with a lot of others, no change there then. Regards."	
Local Resident	<p>"Culture and the Arts should be a key element of this Vision for Romford, but unfortunately very little consideration is made to them. Culture has to be viewed as a public good, a fundamental right alongside Health, Education, Social Services and Essential Infrastructure. It will be a complete failure if this new Vision for Romford does not have a strong cultural element, including cultural infrastructure. Culture is not just an industry. Culture brings people together and it's crucial for the wellbeing of the citizens, but it needs support to facilitate access and participation, and active policies to help its professionals."</p> <p>"Culture and cultural infrastructure is missing. There's also an incomprehensible omission, the building of the now closed Atik, next to the station: <a href="https://cinematreasures.org/theaters/13772">https://cinematreasures.org/theaters/13772</a>  <a href="https://www.facebook.com/HavLib/posts/the-havana-cinema-romford-artists-impression-1935the-havana-cinema-in-south-stre/3343015915746435/">https://www.facebook.com/HavLib/posts/the-havana-cinema-romford-artists-impression-1935the-havana-cinema-in-south-stre/3343015915746435/</a> The new Romford Masterplan can't miss this opportunity to bring back the former Atik to create a music venue and cultural hub for Romford and Havering. It's a historic building, deeply rooted in Romford's cultural past (cinema, music venue, club...). It would be a crucial addition to the cultural strategy that is being developed in Havering after the bid to become London Borough of Culture 2025. There're several experiences that clearly demonstrate how new cultural spaces can create a focal point for the community, improve the wellbeing of the citizens and drive economic recovery. I was personally involved in the creation of "The Sage Gateshead" in 2004, (now the Glasshouse), which had a huge impact on the rehabilitation of the city." "I'm a Romford resident and I'd be willing and really happy to meet with the team developing the masterplan to discuss how culture and the arts could be incorporated, and explore the key contribution that the building of the former Atik could play as a music venue and a cultural hub. "</p>	Comments noted. Please refer to section 3.3 of the consultation statement for proposed changes on these topics.
Cllr David Taylor	<p>"The desire to focus the market on 'local goods and services' is admirable. However, much of the core of the market is a different, and lower cost, offering. We should not neglect these low-cost options. The vision of a "'new residential community'" should only be enacted once infrastructure is in place. We cannot afford to bring in residents first, then hope for infrastructure first. All new developments must start with infrastructure in phase 1." "Celebrating Romford Market - Removing car parking Removing car park will reduce footfall and discourage market traders. It will not 'celebrate' the market, but kill it. Reinstating the historic grain - smaller blocks. This is laudable. However, this will not bring back a historic feel or character. New developments are too similar in character and Romford will, instead, become a soulless rabbit warren. The historic focus should be on reactivating High St, relaying the road as cobbles and the replacement of the concrete structure opposite the museum. 4.2.2 - Infrastructure led The Masterplan should require the infrastructure, such as GPs and schools, are provided in phase 1 of any development and not left until later in the process. Wider green links - Great, all for these. Objective MC7 - a rapid transit system is a fantasy and will not happen. The masterplan should not be reliant on this. In general, a new movement study needs to take place and the data used is outdated. S8 - new growing spaces and allotments cannot be accommodated in new developments, effectively. Havering must look at expansion to existing allotments and the creation of new, larger, allotments." "Resilience / Green Strategy: The masterplan should require all new developments to have an element of water harvesting, to prevent flooding. This could be in the form of rainwater capture of brown water filtration. Opening the Rom, through the Brewery, is in admirable idea. However, if at the loss of the car park then we lose a vital public facility. Cottons Park should be a focus of improvement. Consider a wildlife pond and improvements to children's play equipment. The plans for the market massively reduce usable space, preventing a large market and large events. This removes an important facility for the town." "Forget cycle hubs (aka large cycle shelters that attract homelessness and become dirty and unpleasant (as seem in Hammersmith). Focus on traditional and well placed cycle parking. The plan should not be reliant on a north-south rapid transit link." "Heat networks are expensive an inefficient, and difficult to maintain. Havering cannot rely on the data centre and 'industry' (too vague). Sustainability does not focus enough / at all on water capture and recycling. Where are the policies on rainwater capture? Not SUDS, capturing clean rainwater and using it for services such as cleaning and toilets etc." "As commented earlier. The urban grain suggestions will not produce a historic feel. There should be a formal height limit on buildings. Como Street car park and the</p>	We welcome these comprehensive comments on the Masterplan and its impact upon Romford town centre. Whilst it is considered that the Masterplan fundamentally continues in the same, positive direction, minor amendments to improve clarity have been made. The Vision has been amended to further include reference to reflect an inclusive, enhanced town centre and bringing forth infrastructure. The text within the Masterplan has been amended to encompass greater clarity of the



	<p>Matalan sites are not suitable for taller developments (above 8 storeys) Slaney Road proposals ignore that the area has already become residential due to permitted development. These will not be brought back into use as offices." Social infrastructure must be developed in phase 1 of any development, not later. The masterplan does not harness Romford's 'historic market'. It destroys it, replacing the large market square with seating and pocket gardens, reducing the useable space, and focusing too much on transforming the market into something more artisan. The current market should be complimented with new additions, not transformed into something else. The proposals massively reduce the usable space and, therefore, destroy Romford's largest public event space. "Trinity Church could become a focus point, with a new public square. Instead, it appears to be hidden. High St should be pedestrianised and cobbled. Market stalls could stretch down this street. The Angel Way concrete structures (those opposite the museum) should not be retained, but replaced. This area needs better signage from the market. Redevelopment of the RUSSC club should not take place." "A new station entrance would be a positive. Destruction of the car park would not." "A new station entrance would be a positive. Improvement of The Battis and activation of the arches would be great." None. The Liberty would be best retained as a covered mall. "North Street should not be targeted for increased density of housing. The Como St car park plans do not align with what MLH are currently proposing. "none "This masterplan does not recognise the unique character of Romford. It suggests the destruction of key community infrastructure, such as the covered shopping centre at Liberty, the RUSSC club, and parking spaces. The plan relies on outdated, pre-covid, transport and movement data and so may not provide an accurate reflection of the current situation. The plan proposes an increased density, outside the ring-road, that is not in keeping with the existing character of the Lower Mawneys area. The market will be destroyed by the proposals to transform the market square, as it makes Romford's largest public event space un-useable. There is not enough focus on the historic nature of High Street."</p>	<p>considerations of greening, historic assets and the Market Place in particular, and, with the addition of a new objective, a greater emphasis on considerations of safety.</p>
<p>Sport England</p>	<p>It is important to build on what is good and works and not change things for the sake of change. The key themes and objectives are sound, especially around, health. active travel and environmental sustainability. Financial sustainability should also be considered. The spaces around building and their landscape should enhance the experience of visitors, workers and residents alike. Active travel through the masterplan area is important so are the transport nodal connections to other areas. A more creative/innovative approach to sustainability should be adopted and willingness to approach new and changing technologies as they come forward. Creation of district heating centres through ground source heat pumps could be a positive way forward. This is perhaps weak at the moment. Consideration to creating urban park run areas, or inserting one of Sport England's Local Leisure facility within the development as destination. Use of roofs or basements for multi use games areas, or artificial grass pitches should be promoted. Giving areas their own identity so as to great distinct designation is a tried and tested way. E.g. Birmingham's many quarters jewellery, gun, education, Chinese etc. which you have the start here with the civic campus, market place station gateway etc. But these areas should be created by using different aterials/colours in the hard landscape etc,"Encourage good business planning in order to create sustainable economies. Sport is a good economic generator whether fitness studio or gymnastics club. They also create part-time employment and create training opportunities." "We would suggest looking at our Active Design Guidance for additional enhancements to an already good master plan. <a href="https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design">https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design</a> "</p>	<p>Comments noted. Please refer to section 3.3 of the consultation statement for proposed changes on these topics.</p>
<p>Local Resident</p>	<p>Doesn't need anymore Romford already over crowded and would completely breakdown with 25000 more Space is not there for these amount of people unless you turn it into a high ghetto where crime will sore abode the high levels already Romford can't sustain another 25000 services already stretched to the limit Queens already jammed and wouldn't handle the extra people Turn it into a crime ghetto</p>	<p>Noted</p>
<p>Local Resident</p>	<p>No more people "It's already too crowded and people that have lived here all their lives can't get safe places to live, build houses for these people but making room for 25000 people is an absolute joke! So NO to this!" Parks for our kids! There will be NO character if you cram 25000 more people here and no space! DO NOT BRING 250000 MORE PEOPLE HERE!</p>	<p>Noted</p>

<p>Local Resident</p>	<p>"Having lived on the ring road border since my family moved here from Rise Park when I was six years old in 1988, first in the family home and then close by for the last 19 years in my own home, I was hopeful with the news of the Masterplan that some of what Romford has lost over the last 15-20 years would be brought back. I am both extremely disappointed by the plan and alarmed by some of its intentions, not least demolishing my beautiful and well-built home in favour of 'improved streetscapes'. My parents moved from the East End in the 1970s to get away from inner-city urbanisation and the Romford I grew up in into the turn of the century was still very much a suburban and pleasant area. I find it distressing that Romford is now considered to be urban, and if the plan goes ahead as it is will put the final nails in the coffin of the Romford that was once a desirable place to live. The encroachment of high rise tower blocks has adversely affected the well being of those of us living on the ring road border (and I dare say the quality of life of those living in them with no view other than that of their neighbours' windows is also poor), and the plans for many more thousands of flats in the district, in an area already far too overpopulated, is soul destroying. The Romford of the Masterplan will be one big housing estate where people won't live because they want to but because they can't afford to live closer to the centre of London. The people who grew up in Romford will move out of the area as soon as the opportunity presents itself, as are my intentions (a recent desire based on how things have changed) as well as my siblings and my parents. I have friends and neighbours who also plan to move to get away from the way Romford is heading. Opening up the River Rom will not fix the problems that Romford faces. Building many more flats on top of each other will exacerbate those problems. Not only does our existing infrastructure not cope with the number of people now living in the area, but moving even more people in will stretch it to breaking point. As a commuter, the Elizabeth Line in rush hour from Romford is already beyond capacity; I dread this getting even worse." "Although I am in favour of the principle of the River Rom being opened up, I think the benefits have been overstated for what is, essentially, a stream. I am happy for more trees to be planted along the ring road, but most concerned with plans to reduced to one lane. Rush hour traffic is already a problem, and halving the lanes in the vain hope that fewer people will drive is not going to work in an area like Romford - we are a suburban area despite the council's baffling efforts to change that, and as such people need their cars to get to out of town places. From my experiences in Romford and from what I've read about other places, it seems that when town centres are pedestrianised it increases crime and makes those areas less safe, particularly at night. I would be happier to see parts of the town centre around the shops and market opened up to traffic again, rather than continue down the current line of cutting it off and making the town centre a no-go area after dark. I don't think there is a need to change Romford Station - unless there are going to be more trains, more entrances will only make commuting even worse. I agree that it's not the most inspiring experience to walk along the ring road, but I think it's madness to demolish existing good and well-loved homes to improve it. It was indiscriminately pulling down the past in the 1960s and 1970s that enabled Romford's slow journey into where we are now, and it will only disengage further those of us who have lived in the area for a long time." 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	<p>allow a more even distribution of traffic. "Design well. Design attractive. Design to last. Do not forget that cycling and walking are not possible for some people and some journeys. Do not exclude all others for a health and wellbeing ideology. "Please set a much lower maximum height limit for Romford - it has got out of hand extremely quickly, and put more emphasise on building good houses, rather than endless flats, as the ideal. Having lived on the ring road border since my family moved here from Rise Park when I was six years old in 1988, first in the family home and then close by for the last 19 years in my own home, I was hopeful with the news of the Masterplan that some of what Romford has lost over the last 15-20 years would be brought back. I am both extremely disappointed by the plan and alarmed by some of its intentions, not least demolishing my beautiful and well-built home in favour of 'improved streetscapes'. My parents moved from the East End in the 1970s to get away from inner-city urbanisation and the Romford I grew up in into the turn of the century was still very much a suburban and pleasant area. I find it distressing that Romford is now considered to be urban, and if the plan goes ahead as it is will put the final nails in the coffin of the Romford that was once a desirable place to live. The encroachment of high rise tower blocks has adversely affected the well being of those of us living on the ring road border (and I dare say the quality of life of those living in them with no view other than that of their neighbours' windows is also poor), and the plans for many more thousands of flats in the district, in an area already far too overpopulated, is soul destroying. The Romford of the Masterplan will be one big housing estate where people won't live because they want to but because they can't afford to live closer to the centre of London. The people who grew up in Romford will move out of the area as soon as the opportunity presents itself, as are my intentions (a recent desire based on how things have changed) as well as my siblings and my parents. I have friends and neighbours who also plan to move to get away from the way Romford is heading. Opening up the River Rom will not fix the problems that Romford faces. Building many more flats on top of each other will exacerbate those problems." Far, far too many high rise tower block flats are being planned for - please remove such an oversaturation of such housing. Havering should be doing whatever it can to encourage businesses to open in Romford; however, if the will is not there to do so then there seems little point in building even more unwanted retail space. I favour encourage businesses that offer good, higher paying job prospects than just the low end, which we currently get. I don't think this is strong enough. The homes in Linden Street used to be able to see St Edward's spire, which has now been obliterated. Such decisions cannot be allowed to continue. Seeing sky, distances and heritage are so important for our wellbeing, and have not been considered enough in recent years. Further tall buildings will make this even worse. This is not Manhattan. As a concerned, lifelong resident, I implore you to reconsider many of the Masterplan proposals. They do not seem to have been considered from the point of view of those of us who already live in the area.</p>	
Local Resident	<p>Romford has become very run down and a very unfriendly place to go, yes it desperately needs more health provisions but increasing population will need huge investment in public services and the budget can not provide yhis In theory but where is the money coming from to finance it, with a borough in financial trouble We must keep our Green spaces , people especially children need these I support this and would love to see wheelie bin introduced so this can be done without bags being ripped open all over the street Poor current services due to huge demand. Our hospital cannot cope with population numbers now, poor mental health services too. The town needs more family areas and less pubs it as become a haven for drink and drugs We need to fight to stop funding other London boroughs so more money could support local people and it's services It is the best part Awful now can't get any worse Needs modernisation North street needs careful consideration to allow traffic to move efficiently into town, if this is made more difficult less people will travel into town. I didn't read this bit there too much Just that these plans need to consider residents and also not make it hard for people travelling into town as if so people like myself will not visit town whatever improvements are made.</p>	Noted
Local Resident	Sentence redacted due to offensive content	Noted
Local Resident	<p>I like your vision and the attempts to make Romford greener and friendlier for cycling and walking. The enhancement of the river Rom is particularly striking as is the commitment to improving biodiversity. Promoting active travel and sustainability is just fantastic. My only concern is the resistance of the good residents of Havering who have become so car dependent that they will struggle to see the benefits of this</p>	Noted. Please also refer to Havering's Open space assessment

approach. There is likely to be a lot of opposition to the plans to reduce car parking spaces and to make the roads better for cycling and walking. I like the whole concept of opening up the river Rom and reinvigorating the market. the Brewery gardens corridor is a really exciting idea that I hope comes to fruition in my lifetime. If this comes to pass Romford will be an infinitely more attractive place than it has been up to now. However, as one of the people who joins in the Romford Wombles I am concerned about how it will be kept clean. I am totally supportive of active travel which is the only way to create healthy lifestyles and deal with the need to be more sustainable. I am worried about the resistance of the population who have become so car dependent that they cannot envisage the freedom that active travel gives them. Breaking down the barrier of the ring road would have an immediate benefit in improving my cycle journeys around Romford. I think that your plans will make Romford a much more sustainable town and will so improve things that hopefully it will start to convince people that responding to climate change and making cities more resilient brings benefits. There will be significant challenges in dealing with people who are resistant to these ideas and do not currently believe there is an issue with Climate change or biodiversity loss. As our current MP is one of them this is going to create real problems for you and selling this to the general population will be hard work. There is a mention in the strategy of encouraging food growing opportunities, but I don't see any detail of how that is going to be achieved. There are two allotment sites reasonably close to Romford Town (Rush Green allotments and Pretoria Road allotments). Both are currently poorly managed with large uncultivated areas and long waiting lists. There is a lack of space in Romford for new allotment sites (unless some of the space proposed for building is given up). Could the Masterplan actually look at trying to improve provision of food growing. Perhaps by looking at where it can be fitted into new developments, perhaps with innovative ideas like vertical gardens. There is a lot of social media opposition to the development of Romford with high rise flats and the strain that will impose on local services. I note in the Masterplan that the Council are hoping developers will be able to demonstrate Community support. This is going to be hard to achieve given the ongoing resistance to change. There seems to be some detailed consideration about primary school places, but secondary school places seems very vague. I note the concerns about Queens Hospital not being able to cope with the current population and the space constraints. This doesn't seem to have been addressed. I like the vision of trying to improve the creative and cultural ethos of Romford, although ultimately this will depend on the people of the town. I like the concept of closing the car park and using the space instead for planting and seating, but who is going to look after the planting and ensure that trees are cared for? With the tower blocks on North Street nearing completion it will be important to develop the at grade crossings of the ring round in this area sooner rather than later. Opening up the Rom and getting more consistent development across the area will be important in improving the appearance of this part of Romford. As a cyclist I find the London Road roundabout and the Oldchurch roundabout both particularly scary. Recharacterising the ring road as an urban street will obviously improve this area for cyclists. The need for protected cycle ways in Romford is obvious. I am not sure how much will be feasible as I envisage great opposition to the removal of so much car parking space. Unculverting the river Rom is visionary and will do so much to improve the town centre. It is somewhat tragic that the river on which the town is named is not even visible within the central part of the town. Currently this area is very depressing. The station area is run down and unattractive. There is little green space in St Alban's ward generally so opening up this section of the river Rom as a park would be a very welcome improvement. However, parks need looking after and is this a cost the Council can afford? Although I would personally like to see the Rom Valley way become a cycle and pedestrian friendly route I am concerned about opposition from car drivers. Also car access to Queen's Hospital would be reduced which would create political problems in this car dependent borough. I don't fully understand why there is a need to open up the Liberty centre. Obviously there is an urgent need to develop the Debenhams and other sites along market place that have been abandoned recently. Apart from recharacterising the ring road I am not sure why there is any need to redevelop the Mercury. During the war and just after the Romford bus garage was allotments. Popularity of allotments and growing your own food fell post war and into the 80's. However, in the 21st century and especially post Covid and the cost of living crisis allotments have become popular again. Is there any possibility of asking developers to include community gardens or allotments specifically for food growing

2024 for further details on allotment provision: <https://www.havering.gov.uk/downloads/file/6710/open-space-assessment>

	<p>within any of these developments (eg the bus garage or Matalan or Como St sites)? I think it would be a huge improvement to get rid of that horrid car park. However, I don't think the other good residents of Havering would agree. Surely you are going to struggle to get Council officers and other workers to get to work without a car. As in my comments on North St there is a potential here to ask the developer to consider space for 'grow your own food' with allotment gardens. "Overall I think it is an excellent document. A true vision for a future Romford that is not car centric and improves biodiversity and makes Romford a more attractive place to live and work. Sadly I am aware of a co-ordinated campaign by the Conservatives to undermine the plan and get residents to sign a petition against it. They seem to be capitalising on the fear of the other and a desire to prevent the population from growing. I hope that the Council will be able to stand up to this nonsense. I did spot the occasional typo as I worked my way through the document, so please give it another proof read before publishing the final document." Noted. Please also refer to Havering's Open space assessment 2024 for further details on allotment provision:  <a href="https://www.havering.gov.uk/downloads/file/6710/open-space-assessment">https://www.havering.gov.uk/downloads/file/6710/open-space-assessment</a></p>	
Local Resident	<p>The vision comes across as something a person would want to leave as a legacy project but is it the best use of limited resources? Some of the ideas will make visiting Romford's centre a better experience, but others come across as impractical. Do the proposers not remember the fountain in the centre of the shopping centre and how youths eventually necessitated its removal? My concern is that the River Rom might be a target for anti-social behaviour once again if more of it is exposed. Also, whilst more trees would improve the look of the market and ring road, the suggested changes to the ring road itself will not improve traffic flow. I am happy with objectives 1 to 5. I have concerns that objective 6 appears to be an anti-car idea, similar to those of the London Mayor. Objectives 7 and 9 are a concern as I believe deculverting the River Rom might increase anti-social behaviour and might become a risk to young children. I agree that our green spaces should be improved and be more accessible. Improving how you get from one to another should be a first step, such as a crossing from Raphael Park to Rise Park across the A12. Keeping cars on the outskirts of the ring road and more pedestrian only areas inside the ring road would be beneficial. I do not agree that cycles should be allowed within the shopping area, walkways, etc. Cyclists have little regard for pedestrians and therefore much of the centre should be pedestrian only. Cycle routes could be added but not where large numbers of pedestrians will be shopping/walking. More trees and green spaces will improve the feel of the town. Cars being kept on the outskirts will improve the air quality. All transport (including cycles) being banned from the shopping and pedestrian walkways will reduce accidents with pedestrian and make it a more enjoyable experience. Restricting the height of buildings would improve the character of the town but why has the Council allowed buildings already constructed or currently in construction to be built? A good mix of businesses would be good. Romford needs to encourage the big name stores. At night certain parts of the town become no go areas to older residents. Whilst I understand why providing an alternative to the subways would be beneficial, I don't believe the removal of the roundabouts is sensible. Adding some trees would make it more pleasant. In my opinion the suggestion would damage Romford's attractiveness to shoppers and would encourage them to shop at Lakeside or similar. Disappointing. The more I read the Plan the more I wondered what the authors were really trying to achieve. If it is to improve the shopping experience and creating a greener environment, then some bits of it will achieve this. However, I don't think the public is ready for other bits of it. The Plan comes across as a vision of someone's ideal town and would be fine if creating something from scratch but by trying to change an existing town might destroy what attracts people and may never get those people back.</p>	Noted
Local Resident	<p>Overall the vision for Romford seems cohesive and attractive. I particularly liked the plans for the River Rom green pathway and blue pathway. I've often felt that the river Rom was an underutilised natural asset. I think the objectives are laudable. Particularly liked that it is infrastructure led which is practical. There is also consideration of building a resilient and sustainable future. Again the opening up of the River Rom is key. Pocket parks, squares, roof gardens, improved water quality, enhancing ecology and tree planting. All good "On the whole pretty good. The ring road is problematic because it carves up the town centre, although I'm not sure how much of the proposals are feasible and affordable. Also, be mindful of the following: Car parks. This seems a bit vague. Also, EVs are heavier than petrol/diesel vehicles.</p>	Comments noted. Please refer to section 3.3 of the consultation statement for proposed changes on these topics.

	<p>Therefore, as EVs are used more, conventional car parks can only hold half the number of vehicles because of floor loading problems. Bus lanes/ Cycle lanes. There is no mention of this but please don't use 'floating bus stops'. They are a nightmare." All good. "It is important to keep the historic character to Romford. It could be extended. I was pleased to read about the Conservation Area Appraisal which is underway. The changes to Romford Market area would be welcome. This is another underused asset that Romford has." I have concerns about Queen's Hospital, already working at twice capacity, would be able to deal with the increased numbers of people projected to be living in the area. It would need the old Ice Rink site and more. The wider economy is always tricky. It's going to be really difficult to predict this particularly in the next few years. While your local economy model works in theory, it can be very much affected by the wider economy It is a comprehensive, well laid out vision. Of course, it will be subject to change. That's what Local Plans are for. On the whole, it is better to have an overall plan than not at all.</p>	
<p>Havering London Ltd</p>	<p>We believe culture is essential to a healthy and fulfilling life. Often, culture is an afterthought in major planning. However, given Havering's new cultural strategy, A Good Life 2025-28, which will be more closely embedded within the Local Plan, we recommend a bolder assertion of cultural life in Romford. This could be achieved through an explicit reference to a thriving cultural ecology, the development of new spaces for cultural activity, and investment in improved workspaces. "Havering London has listed our comments under the main objectives, which should apply to the relevant subsections of the plan. 4.3.1 Space &amp; Landscape - SL3 &amp; SL5: To what extent does the plan include provision for basic facilities—such as dressing rooms, storage, and security—for visiting organisations? How will these facilities be realised in the development of Romford Market Place? We would welcome the inclusion of new public art commissions under this section to enhance the distinctiveness of Romford town centre. How might art and design create a welcoming environment for new and changing communities? There is also potential for large gatherings, whether for paid (ticketed - see Leeds Millenium Square) events or free public events. Could the market area be made more attractive to promoters for events such as ice rinks, etc.? 4.3.4 Inclusivity, Health &amp; Wellbeing - IHW3: This objective aligns with A Good Life, which aims to foster both physical and mental well-being. How might green spaces serve as sites for healing, mindfulness, and social connection? Could green spaces support the development of good food ecosystems, providing shared access to resources such as herbs for residents of high-density housing? 4.3.5 Character &amp; Townscape - How might heritage design principles be embedded in new or existing shopfront designs? 4.3.6 Uses &amp; Mix - US3: The Culture Strategy A Good Life 2025-2028 outlines the need for a new cultural space, currently named 'The Light'. This space represents a development opportunity to attract new visitors to the town and support the night time economy, with plans for a new black box event space. The vision proposes a bold £20m+ space to host a diverse range of cultural events, including music, digital light experiences, exhibitions, events, and performances. This approach avoids additional theatre provision in favour of an expanded cultural offer that aims to position Havering as a prominent cultural destination. We would like to see a stronger emphasis on the unique benefits this project will bring, included in the Master Plan. US8: This objective is fully supported by the culture strategy A Good Life 2025-2028, which seeks to foster a more robust cultural economy in Havering. Out of 272 art studios in London, none are currently located in Havering. Studio Havering aims to address this gap by providing temporary space, with a strategic plan for more permanent, affordable workspaces to support an emerging creative ecology. We would like to see an extension of this vision to include a more permanent solution within the meanwhile strategy." "Whilst the location of 'The Light' is still under consideration, we strongly feel it should be viewed as foundational to the development of the town centre. The Culture Strategy, A Good Life 2025-2028, outlines the need for a new cultural space, currently named 'The Light'. This space presents a development opportunity to attract new visitors to the town and support the night time economy, with plans for a new black box event space. The vision proposes a bold £20m+ venue to host a diverse range of cultural events, including music, digital light experiences, exhibitions, events, and performances. This approach avoids further theatre provision in favour of a broader cultural offer that aims to position Havering as a prominent cultural destination. We would like to see a stronger emphasis on the unique benefits this project will bring, with explicit inclusion in the Master Plan." As consultants on A Good Life, we would welcome further</p>	<p>Comments noted. Please refer to section 3.3 of the consultation statement for proposed changes on these topics. A stronger reference to culture in line with the Havering Cultural Strategy 'A Good Life' is now referenced throughout the document and wording strengthened around encouraging cultural activities.</p>

	conversations on how to best integrate the plans of the culture strategy into the Romford Master Plan.	
Local Resident	More police on street ie Elm Park I volunteer at charity shop Elm Park and the back of shop smells of drugs gangs of youths hang around steal from shops in area nothing done Space for child play is important and care of elderly important health hub king George's old hospital I congratulate you for Help for Hornchurch rum on old airdrome a import part of history Help for elderly alone more community units that don't cost for elderly Our Romford market a lovely community needs more stall holders so lower the cost of stall rent go wild and open back Sundays clean up area most stall holders been there years appreciate them it's a big part of Romford old and new At car park isn't safe was robbed there at car park whilst paying ...more security and better lighting at night make it safe Help the homeless at marks and Spencer's Let's clean up Romford streets make us a community that helps	Noted
Local Resident	Not everyone can walk and cycle. Especially in poor weather and the cold. Carrying heavy bags etc. getting rid of car parks will support the closer of more shops. Theft and anti social behaviour is on the rise and as a woman I do not feel safe in Romford anymore. Using Public transport is dangerous and I have seen fights, people smoking cannabis, people threatening and intimidating other transport users. Drunks and men trying to touch women inappropriately. I will only go to Romford now if I have to use the hospital or for an emergency. I will always use my car from now on. At least I'm safe in my vehicle and I can lock the doors. I no longer use the cinema or restaurants as it's unsafe of an evening. It's a terrible shame you have ruined the market and traders. Unique shops have died out and small independents can't survive with the high rents. It's the same boring standard shops you can find anywhere across London and Essex. Car parking chargers are now too expensive to justify going to Romford when Lakeside and Bluewater have the exact same shops with free parking and it's safer. "Sounds like Romford is going to become a 15min city. WEF has started to close in. What London boroughs have had a reduction in crime with these new measures? Statistics show an increase in crime. What London boroughs have had a reduction in traffic? Statistics show an increase on main roads. Why is owning a private vehicle suddenly so terrible? Why is having the freedom to drive to several places in a short space of time something awful? You have never had three children doing different activities on the same day in different locations, ballet in one area, ice hockey in another and football in another. It is impossible to get to all locations for drop off and pick up using public transport. This is how you kill grassroots sports and hobbies. There is no need to narrow roads. Roads are for cars. The pavements are perfectly wide enough as they are. You are wasting money. [sentence redacted] When is the borough going vegan? When are you banning meat and how will you do that? The mayor said he was going to ban meat in London. By 2030." "You don't need to narrow roads. The pavements are wide enough as they are. Have you counted how many people are using the pavements? You are wasting money. Please don't plant trees near the mains water line as the roots damage the pipes. Do your survey carefully first. Don't plant trees too near houses as the roots damage the foundations." Keep the cars moving and therefore there will be less traffic. Narrow roads more traffic. Stop this war on private vehicles. It is freedom for most people. Stop this WEF madness. Go to China, India and Russia and tell them to start doing it first. "Show me the details that it reduces cancer etc? Even when we only had horse drawn carriages there was a problem with this. It's not inclusive or well being if it is unsafe to walk or cycle in the dark or being followed on public transport. Increase the police in the borough with stop and search. Much better use of money than walking in the dark through a new dimly lit park with low life's using as a drug den or toilet." "You killed the market by high rents. The character will change and start to look like all the other lefty boroughs but with increased crime. Keep building flats and Romford will look like the ghetto you desire." "No, you want Romford to be a 15 min city WEF ghetto. It's so creepy. You have already started to kill the economy but now you want to accelerate it further. People do not use shops more if they have to walk. Look at central London. Have you learnt nothing??? It is dying. High streets are dying and expensive stores have shut down. That's true facts. Look at Oxford street and Bond Street as an example. Cut the cars, cut the business and economy. Keep believing the mayors lie. You are weak and can't stand up to him. No people, no market. If I can't park in the day I won't be going. I'll just sit back and watch it die, as you add more fast food shops, American sweet shops and special barbers. Wasting money. Build a new hospital that is fit for purpose and decent size schools with large classrooms and outdoor space. You are going to kill	Noted.

	<p>it off. Or is that your plan? The car park was used, but Romford is now unsafe so people won't go. Get the mayor to increase the police budget rather than this nonsense of cycle and walk ways. Sort that out first then look at cycling. Why are you all so blinded? "Police, police, police!!! No need to make something modern looking when the people near the station are criminal gangs who know there's not enough police in the area. STOP WASTING MONEY!!!" Stop wasting money or is this from a special pocket of the London mayor and the WEF? "More waste of money. You council people really know how to throw money away. Sort out crime and burglary, theft and street lighting. Fix the potholes." "More waste of money. You council people really know how to throw money away. Sort out crime and burglary, theft and street lighting. Fix the potholes."</p> <p>"SORT OUT THE CRIME AND GROUPS OF MEN WHO FOLLOW WOMEN!!! Sort out crime and burglary, theft and street lighting. Fix the potholes. MAKE ROMFORD SAFE!" "MAKE ROMFORD SAFE! Better street lights and more police. Fix the potholes in the road first!" "Another waste of money? What are you doing? Look at the crime rates! Look at the people entering the borough!" "Before you go ahead with your creepy utopian WEF dream. Take a moment to reflect on the true issues Romford is facing. Fix that first. Be honest with the crime statistics and get it sorted. You can't have all this weird walk and cycle agenda when people are mugged and robbed everyday. Get funding for more police, better health provision better street lighting, better road and pavement surfaces. Then start your weird WEF agenda."</p>	
Local Resident	<p>Sounds like an excellent idea to transform the community. I believe making the town centre walkable should be our main priority. Currently the main issue I face while getting in and out of the town centre is the lack of safe walking spaces. I live a 10 minute walk from the market, however I must go down the tunnel in North Street to do so. I would love to suggest a pedestrian crossing over the roundabout for North Street and St Edward's Way as this would mean I can feel safer about my journey in and out of the town centre. Thank you for taking the time to review my feedback, I look forward to the changes you have proposed. The objectives are good Thank you for taking the time to receive my feedback</p>	Noted
Local Resident	<p>Sounds desirable but essentially are puff words. Pocket parks are a waste of money. Look terrible, not maintained currently. "All sounds very worthy and white middle class. Not convinced how much can be delivered by what's proposed - all sounds quite aspirational and as if there's guaranteed causality between interventions and outcomes but doubt that's true in reality. You'll get what you get from the combo of people and businesses in the area. Definitely support River re-wilding and decanalisation and deculverting. Don't think youth need lounges or counselling facilities - these are trendy sticking plasters and not dealing with root cause issues."</p>	Noted
Local Resident	<p>Only that you are lying and trying to make it sound that you will be offering more than we already have which is a lie, Sounds like paragraphs of made up waffle. I would have been able to take this more seriously if you had presented this in a more concise manner. I feel you have presented it in this way deliberately in order not to be clear and truthful, "Not sure that there will be much space to speak of after you have rammed in that amount of flats. I know it's called a river, but it's more like a stream. How are you going to have the manpower and money to maintain and sweep up the mess that the proposed trees will create each autumn." "Where is the mention of improvement for road traffic? What are you doing about this?" Nice buzzword, but I'm sure that cost will be the driver. "The most important thing I would have expected to see under this heading was proposal of either a big extension to Queens or a new hospital to cater for the additional thousands more people. Absolutely appalled that this is not part of the plan. Walking &amp; additional seating will not help treat cancer or deliver babies!!!" The blocks of flats are too high with no where near the amount of space between them that there should be, they are far too cramped together!! Will there be Uses &amp; mix or will it just be flats, chicken shops, Turkish Barbers and coffee shops!!??!! This sounds more like a wish list rather than factual. You will be creating more traffic with the road layout &amp; crossing changes. You will be creating more traffic with the road layout &amp; crossing changes. The people that have created this plan do not live here, so have no idea how this will affect local people. This is a busy mix use, central &amp; convenient hub for Romford. This should not be changed. You are taking away our lovely comfortable indoor shopping area which is a able to be kept clean and tidy "I have to say that I am disappointed and disgusted by this proposal. Cannot believe you are proposing to build what will probably be rows and rows of ugly square boxes which will have everyone's belongings or should I say crap on show for everyone to see. It is likely that no windows will ever be cleaned and the whole place will look like a ghetto a few years</p>	Noted



	down the line which will be accelerated if any of them are rendered. How can you propose this many flats without the proper additions to the local infrastructure to support this!! I'm afraid some trees, walkways and additional seating will not make up for this!!!"	
Local Resident	Sounds interesting Parking is an issue, especially if you're disabled but don't qualify for a Blue Badge because you don't claim benefits "Not read it but ableism is rife. More needs to be done to support disabled people." "Economy is all about capitalism. More to life than making money." Provide parking for free on certain days Not read it Stop wasting money on Green Flag Awards! Stop giving residents PCNs for using their own streets. Clamp down on pavement parking & noisy cars. [sentence redacted]. Stop shops from keeping their lights on all night. Ban the sale of noisy fireworks."	Noted.
Local Resident	I would like to see the continuation of variation. Today there are evening food and beverage places which are mixed amongst services and shops. In other remodelled towns I have seen "restaurant districts" bring formed which takes away the character. Green and blue connectivity will be excellent. Outside of market place it's important to keep character by having varying purposes adjacent, so that restaurants are next to shops and services "The plan is excellent in it's breadth depth and vision As with the consultation the overriding resident concern is antisocial behaviour in all its forms from litter through to crime. Open spaces, lighting etc improve this. Ultimately this is not a leafy, gentrified safe area and so design for safety is paramount"	Comments noted. Please refer to section 3.3 of the consultation statement for proposed changes on these topics.
Local Resident	Sounds good! Sounds sensible to me. Nothing to add. "It looks good but on the Green Strategy, I would add one word so that it reads: A network of primary, secondary and tertiary green corridors and spaces providing public amenity, walking, WHEELING, and cycling routes, increased biodiversity and playspace distributed across the town centre." "I strongly support the idea here of doing much more to enable active travel and public transport. Again, wheeling needs to be added to ensure that the needs of all are met."I strongly support the ambition towards sustainability. I'm very supportive of the ideas in this section but I would like to point out that ENABLING active travel for all is what we need as well as just ENCOURAGING it. "Again, this looks encouraging. I like the fact that careful thought has gone into considering how to balance retaining our heritage with developing for future needs." "I am pleased to see a removal of the space given over to car parking in the market place favour of more social space. I very much welcome the focus on developing health, education and youth services." I'm pleased to see that the evidence that active travel is important in supporting local shops is taken on board. "It looks good but the diagram shows a ""dedicated cycle lane"" providing the link to Main Road. If this means lanes painted-on the main carriageway rather than being segregated lanes, then it is not safe and would not conform to the latest standards (currently LTN 1/20)." "It looks good but the diagram shows a ""dedicated cycle lane"" providing the link to London Road. If this means lanes painted-on the main carriageway rather than being segregated lanes, then it is not safe and would not conform to the latest standards (currently LTN 1/20)." Looks good! "This looks really good but in making the station much more accessible by bike, there will be a need for much more secure cycle parking and I don't see any provisions. I would like to see a mobility hub combining secure cycle parking with mobility hire." This looks good but it needs to include walking and cycling links from Rom Valley Way into the Queens Hospital site which is a key destination. Looks good. "The ""dedicated cycle lane"" on Main Road needs to be segregated for safety and to comply with LTN 1/20. This may also apply to Western Road but depending on motor traffic levels." "The text mentions a very welcome segregated cycle lane along the length of North Street but this is not shown on the diagram where it appears as a ""dedicated cycle lane"". The cycle lane on North Street needs to be segregated for safety and to comply with LTN 1/20." As previously mentioned, The "dedicated cycle lane" on Main Road needs to be segregated for safety and to comply with LTN 1/20. "I welcome the opening up of the route under the railway at Nursery Walk to enable more quiet active travel route options. The ""dedicated cycle lanes"" on Dagenham Road and Crow Lane needs to be segregated for safety and to comply with LTN 1/20." "This is a very encouraging piece of work which with some small amendments could plot some great improvements for Romford and the surrounding areas. Thank you!"	Comments noted. Please refer to section 3.3 of the consultation statement for proposed changes on these topics. The Romford Masterplan acts as an outline vision of the future of Romford. Details related to design elements such as dedicated cycle lanes would come forward through planning applications and associated highway and footpath improvements; this level of detail is not included in the masterplan.
Local Resident	The focus should be on maintaining the town like character of the area and far less on creating any more larger blocks of flats. I am a resident of [street name redacted] and note the potential relocation of the bus garage to make way for employment uses and	Noted

	<p>further residential flats. If any such change was to take place to the bus garage, the flats would not be met with satisfaction by the majority of residents on [street name redacted] but should it go ahead, the flats please cannot be higher than the existing Centurion Court development that is by the bus garage already so as not to intrude on the privacy of existing residents of [street name redacted]. I am a resident of [street name redacted] note the potential relocation of the bus garage to make way for employment uses and further residential flats. If any such change was to take place to the bus garage, the flats would not be met with satisfaction by the majority of residents on [street name redacted] but should it go ahead, the flats please cannot be higher than the existing Centurion Court development that is by the bus garage already so as not to intrude on the privacy of existing residents of [street name redacted]. Before there is anymore re-development in the area, there needs to be an increase in the infrastructure i.e. more trains to increase capacity and a discussion with Network Rail/TFL as to whether the fast trains during rush hour to Southend etc could include Romford as an additional stop because the trains are already over crowded and the existing flats aren't even inhabited yet. I am a resident of [street name redacted] and note the potential relocation of the bus garage to make way for employment uses and further residential flats. If any such change was to take place to the bus garage, the flats would not be met with satisfaction by the majority of residents on [street name redacted] but should it go ahead, the flats please cannot be higher than the existing Centurion Court development that is by the bus garage already so as not to intrude on the privacy of existing residents of [street name redacted]. I am a resident of [street name redacted] and note the potential relocation of the bus garage to make way for employment uses and further residential flats. If any such change was to take place to the bus garage, the flats would not be met with satisfaction by the majority of residents on [street name redacted] but should it go ahead, the flats please cannot be higher than the existing Centurion Court development that is by the bus garage already so as not to intrude on the privacy of existing residents of [street name redacted].</p>	
Local Resident	<p>"What retail option will be left if both shopping centres, as per plan, are removed and replaced by tower blocks? The town has limited availability or quality stores already, and this plan removes hopes it will be an improvement. There is no provision for parking-there is a problem with it already for people living within the ring, and removal of spaces will make it even more difficult to find a space if we'll have to compete with huge influx of new residents and other residents who come to the town and needs to use a car for work, or to do a big shopping, not everyone can carry all by hand."  "Supporting only the river Rom opening and creation of riverside public space as well new rail station entrance, Transforming the whole Market Sq into one space hosting events and activities is wrong. There are surrounding building-empty one or sublet selling poor quality product which could be removed and replaced with event space, or be used for indoor market - look London Borough for inspiration. A divide of the space and reserving part of it for parking is necessary, otherwise it removes initiative to visit the town for those living outside the town where there in no public transport or are disabled and required to be able to park near the store. Agree, that the town needs more trees and benches around, but also clean streets, and safe underpass to the town, and the responsible who will maintain it. The current 'green pocket parks' or shrubs are not looked after, so what's the point to create more which will overgrow. If Council want to become zero carbon town, perhaps starts with light, noise, air pollution - building don't have dim lights at night - almost all are bright as much as during a day, their banners too, streets lamps along South Street, Victoria St for example, are all led and too bright affecting sleep, and wildlife; amplified low tone bass music from nightclubs/pubs which should have insulations affects quality of rest time; cannabis's smoke can be smelled around. Remove rats. Install community fibre broadband because current mobile networks, since frequencies are shared, is heavily overloaded resulting in poor connection, and the current option of via phone socket internet is even worse, not everyone uses tv and can get package through that provider. The focus on everyone walking and cycling to town is a utopia. Current cyclist - mainly youths or delivery bikers are not following any rules while cycling between pedestrians and not using any cycling lines (see the recently created by McDonalds) posing danger to residents, more of them on the pavement will enhance the problem. Overall why not focus on existing problems which can be resolved within the next few years, and enhance life of existing residents living in the area, instead of adding more problems due to overcrowding." Supporting new rail station and river opening only</p>	Noted

Local Resident	Victoria Road between South Street and the A1251 - proposing to invert the pavement and parking spots so that the pedestrians walk adjacent to the shop and restaurant fronts and the cars are parked beside the road. As is customary in most commercial streets. This would a) make it a lot safer and b) be good for businesses and more aesthetically pleasing. (Same answer repeated for each question).	Comments noted. Please refer to section 3.3 of the consultation statement for proposed changes on these topics.
Local Resident	<p>"In summary, the commitment to biodiverse planting is very welcome, but please also consider building-dependent wildlife such as red-listed bird species which inhabit buildings in Romford. Therefore, please add to the Masterplan: Swift bricks are a universal nest brick for small bird species and should be installed in new developments including extensions, in accordance with best practice guidance such as BS 42021 or CIEEM. Artificial nest cups for house martins may be proposed instead of swift bricks where recommended by an ecologist. Existing nest sites for building-dependent species such as swifts and house martins should be protected, as these endangered red-listed species which are present but declining in Romford return annually to traditional nest sites. Mitigation should be provided if these nest sites cannot be protected. In more detail for supporting evidence, the reason for this is that nest sites in buildings and bird boxes/ bricks and other species features are excluded from the DEFRA Biodiversity Net Gain metric, so require their own clear policy. The Government's response in March 2023 to the 2022 BNG consultation stated that: ""We plan to keep species features, like bat and bird boxes, outside the scope of the biodiversity metric... [and] allow local planning authorities to consider what conditions in relation to those features may be appropriate"" (page 27, <a href="https://consult.defra.gov.uk/defra-net-gain-consultation-team/technicalconsultation_biodiversitymetric/">https://consult.defra.gov.uk/defra-net-gain-consultation-team/technicalconsultation_biodiversitymetric/</a>). Swift bricks are the only type of bird box specifically mentioned as valuable to wildlife in national planning guidance, along with bat boxes and hedgehog highways (NPPG Natural Environment 2019 paragraph 023). They are also supported by London Plan Policy G6 (item B4). The National Model Design Code Part 2 Guidance Notes (2021) also recommends bird bricks (Integrating Habitats section on page 25, and Creating Habitats section on page 26). Swift bricks are considered a universal nest brick suitable for a wide range of small bird species including swifts, house sparrows and starlings (e.g. see NHBC Foundation: Biodiversity in New Housing Developments (April 2021) Section 8.1 Nest sites for birds, page 42: <a href="https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf">https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf</a> ). Swift bricks are significantly more beneficial than external bird boxes as they are a permanent feature of the building, have zero maintenance requirements, are aesthetically integrated with the design of the building, and have better thermal regulation with future climate change in mind. Therefore, swift bricks should be included in all developments following best-practice guidance (which is available in BS 42021:2022 and from CIEEM (<a href="https://cieem.net/resource/the-swift-a-bird-you-need-to-help/">https://cieem.net/resource/the-swift-a-bird-you-need-to-help/</a>)). The UK Green Building Council (UKGBC) is a membership-led industry network and they have produced a document entitled: ""The Nature Recovery &amp; Climate Resilience Playbook"" (Version 1.0, November 2022) <a href="https://ukgbc.org/resources/the-nature-recovery-and-climate-resilience-playbook/">https://ukgbc.org/resources/the-nature-recovery-and-climate-resilience-playbook/</a> This document is designed to empower local authorities and planning officers to enhance climate resilience and better protect nature across their local area, and includes a recommendation (page 77) which reflects guidance throughout this document: ""Recommendation: Local planning Authorities should introduce standard planning conditions and policies to deliver low cost/no regret biodiversity enhancement measures in new development as appropriate, such as bee bricks, swift boxes [and bricks] and hedgehog highways." Many local authorities are including detailed swift brick requirements in their plans, such as Tower Hamlets Local Plan Regulation 19 stage (paragraph 18.72, page 328 - <a href="https://talk.towerhamlets.gov.uk/local-plan">https://talk.towerhamlets.gov.uk/local-plan</a> ), which follows the exemplary swift brick guidance implemented by Brighton &amp; Hove since 2020, and Wiltshire Local Plan Regulation 19 stage, which requires an enhanced number of 2 swift bricks per dwelling (policy 88: Biodiversity in the built environment, page 246 - ""As a minimum, the following are required within new proposals: 1. integrate integral bird nest bricks (e.g.,</p>	Comments noted. Please refer to section 3.3 of the consultation statement for proposed changes on these topics.

	<p>swift bricks) at a minimum of two per dwelling;"  <a href="https://www.wiltshire.gov.uk/article/8048/Current-consultation-Reg-19">https://www.wiltshire.gov.uk/article/8048/Current-consultation-Reg-19</a> ), so such an enhanced level should also be considered."</p>	
<p>Having Islamic and Cultural Centre (HICC), c/o NTR Planning</p>	<p>"Masterplan Themes - Section 5.0, Uses and Mix - Section 5.7, Community – Section 5.7.2.8 (page 109) The existing wording confirms that the Council will broker discussions between community groups and prospective developers at the pre-application stage to help highlight opportunities for use by existing and new communities to foster social cohesion, which is positive. However, it does not explicitly confirm the need to maintain, protect and re-provide existing community uses, as well as meeting changing social infrastructure needs. We suggest the following amendment to the first paragraph to address this: Existing wording. 'The Council will help broker discussions between community groups and prospective developers at the pre-application stage to help highlight opportunities for use by both existing and new communities to foster greater social cohesion.' Proposed new wording. 'The Council will help broker discussions between community groups and prospective developers at the pre-application stage to help highlight opportunities for use by both existing and new communities to foster greater social cohesion. Redevelopment within the town centre/Romford Strategic Development Area must maintain (or re-provide) and improve existing community uses, taking account of changing social infrastructure needs.'"</p> <p>"Site Guidance – Section 6.0, Rom Valley - Section 6.6 (page 150). Section 6.6 relates specifically to the Rom Valley area, and includes the South Street site. The annotation relating to the 222 – 226 South Street site highlights the existing locally listed Page Calnan building with an annotated text box reading: 'Locally listed Page Calnan Building, 222 South Street, to be retained.' There is no approved planning policy requiring the retention of this building, and the decision as to whether or not it should be retained would be more appropriately dealt with at planning application stage, when plans for the redevelopment of this site are known and all matters can be considered in full in the planning balance. If there is a need to reference the building in the Masterplan, the annotation should be amended to read: "Locally listed Page Calnan building.". Site Guidance – Section 6.0, Rom Valley - Section 6.6, Vision - Section 6.6.2.1 (page 152). The vision section (page 152) includes reference to community uses fronting the River Rom, which would allow flexibility for a religious/community use on the site and is welcomed. However, it suggests that such uses should be small scale, which may not allow for a replacement community facility of the scale required. We therefore suggest the following changes to the wording of this paragraph to build in flexibility. 'Deliver a predominantly residential neighbourhood, with an employment focus along Rom Valley Way, supported by appropriate retail, community and leisure uses fronting the Rom. Opportunity for replacement religious community use to serve the needs to the wider community (South Street). Development should transform this out of town shopping and employment area into an attractive and vibrant place, with improved street definition and active frontages that take advantage of and enhance the River Rom. It should provide a transition into the town centre and feather into the residential hinterland, with an opportunity for emphasis on family housing.'. We also suggest the following changes to the wording of page 152 (refer to comments above relating to the Page Calnan Building): Existing wording: 'Retain and integrate the Page Calnan building on South Street' - Proposed new wording: 'Retain and integrate the faience and mosaic tiled elevations of the Page Calnan building on South Street. Opportunity for community use.'. Annotation to the text box relating to the River Rom. We support the aspiration to naturalise the River Rom, however there are a number of complexities relating to land ownership, riparian rights and responsibilities and viability. To take account of this and build in a degree of flexibility, we suggest the following amendments to the existing wording. Existing wording: 'Positively engage with the River Rom through a min. of 1ha naturalised greenspace, as a component of a site-wide Nature-based SuDS strategy, that benefits amenity, biodiversity, and reduces flood risk' to . Proposed new wording: 'New development should positively engage with the River Rom and where feasible contribute to naturalised greenspace, as a component of a site-wide Nature-based SuDS strategy, that benefits amenity, biodiversity, and reduces flood risk.'. Annotation to text box relating to pedestrian bridges. We question the feasibility of providing a bridge link and pedestrian route through this site, if it is to be used for religious/community purposes. Any link would need to be agreed with the land-owners on the other side of the river and there are potential safety and security concerns with the creation of a public right of way through a site which may be used for religious community purposes. We suggest the following</p>	<p>Comments noted. The comments are welcomed and have been considered in the context of both the Masterplan as a whole and the site guidance. It is considered that the text regarding the Halnan building is still relevant with the caveat to be retained <i>if possible</i> in the Masterplan in order to address development proposals that may come forward at this this location, whilst acknowledging the importance of the Local Listing of the historic asset on the site. The text does not prevent new development of this area and also retains what is considered a suitable emphasis for the considerations on the River Rom in line with the Masterplan as a whole.</p>

	<p>amendments to the existing wording to address this. Existing wording: 'Provide new cycling and walking routes, including enhanced at-grade crossings and bridges, through the site and along the Rom to improve connectivity to the surrounding area. Proposed new wording: 'Where feasible provide new cycling and walking routes, including enhanced at-grade crossings and bridges, through the site and along the Rom to improve connectivity to the surrounding area. Proposed crossing locations are indicative.' Site Guidance – Section 6.0, Rom Valley - Section 6.6, Development Principles -Section 6.6.3, Land Use - Section 6.6.3.1 (page 153). The table at the top of page 153 (table 22) sets out the key deliverables for this policy area and provides broad floorspace figures to indicate the likely quantum of development (see below). However, the table does not mention community uses. These should be included as a new row in table 22. Table 22. Key Deliverables – Add Community use to the below table, with an indicative quantum to reflect the required scale for the replacement mosque (2,000 – 3,000 m2). We also suggest amendments to the first paragraph to build in flexibility for a community use on the South Street site and to reflect the amended table. We suggest the following amendments to the existing wording. Existing wording: 'Rom Valley should be reconfigured to provide an urban block structure and uses mix, with employment uses and supporting retail providing the core focus of activity.' Proposed new wording: 'Rom Valley should be reconfigured to provide an urban block structure and uses mix, with community and employment uses and supporting retail providing the core focus of activity.' The beige hatching below identifies individual sites as 'potential plots'. For 222 – 223 South Street the beige hatching is limited to part of the site and appears to exclude the Page Calnan Building. This should be amended to extend the hatching to cover the whole site, and to reflect the fact that it is only the faience and mosaic tiled elevations of the Page Calnan building, if any, that should be retained. In addition, we suggest adding annotation here, akin to other text boxes on this page to confirm the appropriateness of the site for a community facility. Site Guidance – Section 6.0, Rom Valley - Section 6.6, Development Principles -Section 6.6.3, Open Space, Streetscape and Ecology - Section 6.6.3.2 (page 154).Page 154 sets out plans for ecological/landscape enhancements to the River Rom. To align the Masterplan with adopted Local Plan policy, the text should be clear that naturalisation of the riverbank will be undertaken, where feasible to do so. Similarly, the pedestrian bridge and walkway shown on the plan should be marked indicative, as a public bridge/footway through the South Street site may be impractical for a religious community facility (refer to justification above). Site Guidance – Section 6.0, Rom Valley - Section 6.6, Development Principles - Section 6.6.3, Access and Movement - Section 6.6.3.3 (page 154) - Page 155 sets out plans for access and movement and again shows a Bridge and pedestrian link through 222 – 226 South Street. This may be impractical for a religious community facility (refer to justification above). In order to allow flexibility, the pedestrian/cycle route and the bridge should be marked as 'indicative'. We suggest the following amendments to wording. Existing wording: 'New bridge links across the Rom provide pedestrian and cycling access from the north-eastern block to the larger plots along Rom Valley Way, and between The Maltings and the site.' Proposed wording 'Where feasible, provide new bridge links (locations are indicative) across the Rom to provide pedestrian and cycling access from the north-eastern block to the larger plots along Rom Valley Way, and between The Maltings and the site.' Site Guidance – Section 6.0, Rom Valley - Section 6.6, Development Principles -Section 6.6.3, Character and Townscape - Section 6.6.3.4 (page 156) The significance of the Page Calnan building and the need (or otherwise) for its retention are matters of planning judgement that should be considered through a planning application as and when the site is redeveloped. Annotation to the text box relating to the Page Calnan Building should be amended as follows: Existing wording: 'Page Calnan building retained and recontextualised'. Proposed wording: 'Page Calnan building faience and mosaic tiled elevations to be retained and recontextualised. Opportunity to re-provide existing religious community facility.'"</p>	
<p>Planning Consultant representing owners of 205-211</p>	<p>No comment thank you. No comment thank you. No comment thank you. We agree with the strategy represented by figure 28, particularly as it will enable the removal of one of the carriageways in Thurloe Gardens which will enable the character of the area charge to be changed in the manner explained elsewhere in the Masterplan. No comment thank you. No comment thank you. We are particularly interested in the south east quadrant of the Masterplan area due to the location of our clients' site at the southern end of South Street adjacent to the Thurloe Gardens area. We have some</p>	<p>Comments noted. Please refer to section 3.3 of the consultation statement for proposed</p>

<p>South Street and 2A/2B Gloucester Road Romford.</p>	<p>concerns over how the closure of one of the carriageways of the ring road is going to be implemented, as there is apparently no funding for this at present. Our clients wish to bring forward development proposals for their site in the short term and are concerned about how uncertainty about the Thurloe Gardens proposals will impact on this. We urgently request that the final version of the Masterplan should only include proposals which are capable of being implemented within the timescale of the plan. The Masterplan has been extended to 2041 and it is projected that there will be an increase in housing of over 10,000 dwellings in the Masterplan area during that timescale. Such a level of activity, combined with the long-term impact of the connection to the Elizabeth line, is in our view going to increase demand for development sites throughout the town centre beyond the projections contained in the Masterplan. We propose that this should be acknowledged at the outset and more of a proactive approach should be taken to provide guidance to facilitate intensification throughout the South East quadrant. At this point, our other main comment concern is the current approach to the future of South Street. If you go back to the earlier master plan documents. e.g., the statutory plan of 2008, the development framework of 2015, South Street is consistently identified as providing a gateway and an important approach to the town centre. Due to the evolving town centre strategy, due to land availability, planning permissions, etc there is an important north/south route to the west of South Street which links to the new main entrance to Romford station, and follows the river Rom to the south. The concern we expressed in our letter dated 4 May responding to the consultation that was carried out in the first part of 2024, was that the Masterplan should avoided separating the west side of south street from the east side as South Street was an important approach to the main town centre. Over time we consider that the character of both sides of south street should become more unified rather than the west side being treated as a physical boundary marking the limit of the transformation that is taking place to the west. It just does not seem appropriate to have that on the west side whilst the east side is providing the boundary to the residential area to the east.. This is not just about height, as the west side is already taller than the east side in many places. We consider there to be the need for a single urban design approach to South Street, which resolves issues of disparity in height and character which provides guidance over what ground floor uses would be appropriate. Our clients are very interested in this issue as their site is the southernmost site on the east side of South Street before you get to the ring road. Please see response to Question 10 above. Please see our answer to Question 10 We have been grateful for the opportunity to submit our comments on the draft Masterplan. We would also like to thank the officers for arranging a meeting with us to review our concerns and provide the clarification we needed on certain aspects of the Master plan. As far as the way forward is concerned, we do understand that your process will be to consider the responses made to the Masterplan as part of the process of making final revisions to the Master plan before it is published. No doubt the Masterplan will only be finalised once the revised NPPF has been published."</p>	<p>changes on these topics.</p>
<p>Local Resident</p>	<p>"I recently was on holiday and during a conversation with a person who is and will be involved with the redevelopment of the area of Romford adjacent to the station around the hole area encompassing the bus terminal, ambulance station and within the ring road. which I must say comes as a surprise , but the most surprising element is that housing blocks will be built without parking ,restricting housing to those without vehicles. And so the motorist comes under attack again,added to the apparent car parks being closed which means more people will use Stratford, Lakeside and Bluewater. Well done Havering council." Disgusted Get people back to full time 5 day working (I work in maintenance and have not had any time off through Covid or since) apart from when the whole premises had to close). If that is what it is called, I have already commented. If the council is in the amount of dept it says it is where's the money coming from???"</p>	<p>Noted</p>
<p>Local Resident</p>	<p>"Please demolish the former Debenhams or at least turn it into something that can facilitate leisure, or move M&amp;S into it. Home Superstores is an eyesore, I assume because the building is too large to manage. They should have an appropriate sized shop that suits them better. Also I think it would be a good idea to make Romford a centre for music given its history with clubs and nightlife. Affordable music studios may attract music artists here and bring some life back into Romford's dying nightlife. I imagine a ""Camden of East London"" but a bit cleaner and cheaper, more independent and grassroots. Also please make the rivers a central point of urban public space." The plan is well thought out. Perhaps try and that whole tram proposal</p>	<p>Comments noted. Please refer to section 3.3 of the consultation statement for proposed changes on these topics.</p>

	<p>from years ago a reality. Easier said than done though. Perhaps all buildings should have solar panels? From my first comment, music industry may do very well in Romford, plus having rent-out music venues. Please try avoid gentrification. Would independent brewers work in Romford? For the shopping centre itself. Its ok. Commercial units under railway arches would be good. Its a good plan.</p>	
Housing Regeneration - LB Havering	<p>"6.10 The guidance should acknowledge the scale of development on the opposite guide of Main Road, in particular the 13 storey development at The Axis and allow for some incremental stepping down from this scale at certain points to the frontage of the Civic Campus site. In particular, the potential to redevelop the existing Central Library site with an increased storey height and potentially areas to the eastern frontage of the Civic Campus, currently forming the access road and front car park, where to do so would not impact detrimentally upon the grade II facade of the existing Havering Town Hall building."</p>	<p>Comments noted. Please refer to section 3.3 of the consultation statement for proposed changes on these topics.</p>
Local Resident	<p>"This sounds lovely. I'd really like the market to take inspiration from Borough Market, Maltby Street Market &amp; some of the new purpose-built markets like Mercato Metropolitano &amp; Boxpark - where small businesses, restaurants and startups can flourish and bring new life into the area. (Perhaps we could reach out to some of the founders of these marketplaces to get their investment and expertise in rejuvenating the market?) In terms of nurturing communities, I'd love the plans to consider the growing LGBT+ community in Romford (see, Romford Pride, Kaleidoscope, Romford Queer Film Night etc) and neighbouring areas. There are lots of suggestions in the plan for how to be inclusive and boost the economy - and this is an affluent community that is ready to flourish here - especially with the Elizabeth Line stopping at the new Dean Street entrance of Tottenham Court Road, making it simple to get from Soho to Romford. I believe the end of High Street (near the Salvation Army) could be perfect for this, as there are already two large pubs that are being under-used (one is boarded up, and the other [The Bitter End] is a food market). Offering either of these spaces to a prospective tenant for a discounted rate so they can set up an inclusive venue could be an effective way to give this community a focal point to establish itself further, while breathing new life into these disused spaces in an interesting way. We also have some high profile LGBT celebrities &amp; allies who grew up here, including Russel Tovey - who may be willing to endorse a project like this. It would also be a novel way to meet part of the 'inclusivity, health &amp; wellbeing' objectives and would have the tertiary benefit of bringing people through Romford to this destination, which is often under-explored." These are absolutely wonderful. I couldn't be happier with them. They're all incredibly important, and they seem to be well researched and outlined. "I LOVE this section. It's absolutely wonderful, and would be such a beautiful way to regenerate the area. I would be overjoyed to see the Rom uncovered/decultivated and turned into an attraction; and to bring some greenery back into the town centre! So many lovely, beautiful suggestions here - and I'm strongly in favour of all of them. There are three parts that I'd be keen to see added in this section though: - There are mentions of Roof Gardens later in the document, but there don't seem to be any specific details of where these may be. I think proposing public roof gardens on top of the new Brewery Structures (either like RoofEast in Stratford [i.e. young, vibrant, trendy] or Kensington Roof Gardens [upmarket, family friendly]) could be a great way to use the space and get more greenery into the town center. - Cottons Park is barely mentioned, despite being part of the proposed east-west green link / green corridor. Currently Cottons Park is very run-down (particularly the children's play area) which is covered in graffiti and contains broken equipment. Many parents I know locally are scared to take their kids there because it doesn't feel welcoming due to the very poor state of the park. --- Wates (the partners on the Waterloo Estate regeneration) have previously offered to contribute to the funding of new play equipment in Cottons Park as their currently approved plans don't have sufficient play space - so this option should be explored to bring Cottons Park up to the new standard that is proposed in the Master Plan. --- Cottons park also has potential to be an attractive space for a wider audience too, due to the skate park and rugby pitches; but it would benefit from features like a cafe and some tables/seating during operation. These would be utilised by the new residents in the Waterloo estate, as well as the current residents either side of the park. - I'd love us to consider hiring some local street artists to help beautify some of the less-loved parts of town, and using them as a canvas to create art and murals that attract the eye and replaces the run-down blank sides of buildings. For example; the back of Atik, the side of Stadium Fish &amp; Chips, the upper floors of the 80's era buildings on South Street, the</p>	<p>Comments noted. Please refer to section 3.3 of the consultation statement for proposed changes on these topics.</p>

wall of the disused pub on Angel Way, the former Debenhams building" "This is all very important, and a new entrance on Exchange Street would be amazing. The arches are very under-utilised at the moment, and they'd be a perfect new entrance to Romford. It's probably too ambitious (although the rest of the plan is already very ambitious!) but it would be incredible if the part of the Ring Road that separates the Brewery from Waterloo could be buried. This would stop it from cutting off the west of Romford from the town centre - without impeding the flow of traffic by having lots of crossings. I would also love to know the plans for the walkway at the end of Cotleigh Road/Nursery Walk. It seems to be listed as an 'Active Travel Street', but it's currently very small and poorly maintained (and not very safe!). It could be significantly improved by being widened, and having some better lighting. It's also surrounded by under-used cordoned-off green-space - that could be integrated into the plans for changing the tunnel." Nothing major, just that it would be good to address the flooding in the underpasses around the Brewery. These seem to flood very easily, which cuts off access for pedestrians. Utilising a more permeable material may help the environment and pedestrians. "These all sound really lovely. I think these steps could make a huge improvement to the quality of life in Romford, and make it an attractive place to live. In terms of nurturing communities, I'd love these plans to consider the growing LGBT+ community in Romford (see; Romford Pride, Kaleidoscope, Romford Queer Film Night etc) and neighbouring areas. There are lots of suggestions in the plan for how to be inclusive and boost the economy - and this is a (typically) affluent community that is ready to flourish here - especially with the Elizabeth Line stopping at the new Dean Street entrance of Tottenham Court Road, making it simple to get from Soho to Romford. I believe the end of High Street (near the Salvation Army) could be \*perfect\* for this, as there are already two large pubs that are being under-used (one is boarded up, and the other [The Bitter End] is a food market). Offering either of these spaces to a prospective tenant for a discounted rate so they can set up an inclusive venue could be an effective way to give this community a focal point to establish itself further, while breathing new life into these disused spaces in an interesting way. This community is currently very under-served in the wider area, with the closest full-time LGBT venue in London more than 10 miles away (in a straight line) in Limehouse - and I can't see any full time LGBT venue further out east into Essex until Southend! This means there is HUGE untapped demand for a venue in this area. It doesn't need to be a night-time only venue either, we could look to a venue like Dalston Superstore as a model - which does breakfast, brunch, daytime shows and evening entertainment. We also have some high profile LGBT celebrities & allies who grew up here, including Russel Tovey - who may be willing to endorse or get involved in a project like this. It would also be a novel way to meet part of the 'inclusivity, health & wellbeing' objectives while reviving these venues and bringing people through Romford centre to this destination, which is often under-explored." "This all looks lovely too! I love all of the ideas presented here. However, I'd like Cottons Park to be included as a character area. It is already the largest greenspace in the town centre - but gets barely any consideration for regeneration in the plans (though it desperately needs it!). With the right amount of care and attention (which you certainly seem to be giving) it could be a really exciting place to visit; with a proper playground for kids, and some amenities like a cafe for visitors watching the rugby / parents with their kids." "I love all of this. Changing the frontages of the shops to make them more appealing would be revolutionary to Romford especially along the ring road and Exchange Street - and offering appealing office space would be a great way to bring in reliable trade for restaurants/shops during lunch/commute hours. I would be keen for there to be a large gym included in the Brewery/Waterloo proposals - as the Nuffield Gym (currently in the Brewery) as well as the Pure Gym would be lost in the demolition. Having an upmarket private gym (Nuffield, Virgin Active, David Lloyd etc) would attract office workers, residents and visitors to the area - and cater to a different audience than the Sapphire centre (which is lower end). Likewise, an anchor supermarket in this area is \*vital\* as the current Sainsbury's is always incredibly busy - and it would also be lost in the demolition. A large Sainsbury's to replace the current offering would be essential for the residents to avoid driving to the next nearest supermarket (ASDA in the Liberty) - which isn't walkable with shopping. I would love for the sub-power station to be given some attention in these plans too. It currently backs onto the (empty) Atik nightclub - and uses some prime real-estate next to the station. With more modern technology, the footprint of this station could be reduced - or it could be developed to have a public space on top of it (perhaps a raised garden, or new retail space) that could additionally



make use of the arches and the access on the 'Battis'. This will be particularly important if (hopefully when!) the river gets opened up and becomes desirable - as this plot of land will be right in the centre of a key area." "This all seems great, and very exciting if it comes to fruition! In addition to my comments on encouraging the nascent LGBT community in Romford (which I believe could bring in affluent visitors and residents), there are some other points that I'd like to raise. I'd really like the market to take some inspiration from Borough Market, Maltby Street Market - where small businesses, restaurants and startups can flourish and bring new life into the area. I think a foundational part of the market regeneration could be taking over the former Debenhams building and turning that into a modular indoor market (in the same broad concept as popular indoor markets like Mercato Metropolitan & Boxpark [Perhaps we could reach out to some of the founders of these markets to get their investment and expertise in rejuvenating the market?]). This would significantly expand the amount of space that the market would have available (regardless of weather), and would enable the market to offer longer-term opportunities for restaurants/bars/events that may require facilities like kitchens/ovens/fridges that aren't always suitable for outdoor pop-up markets. This would also overcome the issue of the Debenhams building being too large for most retailers (and becoming an eyesore on the marketplace), by splitting it up into a large number of smaller venues that can operate year-round. Lastly, I think an important part of this scheme to regenerate the market (and Romford more broadly) would be to establish a marketing task force for Romford (perhaps based in the new office space) to encourage visitors to the area - promote any big events and new venue openings; raise awareness of the refreshed Market and change perceptions of the area. This could be via PR in publications like TimeOut, as well as social media ads, radio, digital out of home and VOD ads. This should be done in conjunction with the Romford BID to ensure it's relevant for the local businesses - but there should be some earmarked advertising budget specifically catered to advertising events for the smaller businesses that aren't likely to have their own advertising budget." "[As per my previous answer on The Economy] I'd really like the market to take some inspiration from Borough Market, Maltby Street Market - where small businesses, restaurants and startups can flourish and bring new life into the area. I think a foundational part of the market regeneration could be taking over the former Debenhams building and turning that into a modular indoor market (in the same broad concept as popular indoor markets like Mercato Metropolitan & Boxpark [Perhaps we could reach out to some of the founders of these markets to get their investment and expertise in rejuvenating the market?]). This would significantly expand the amount of space that the market would have available (regardless of weather), and would enable the market to offer longer-term opportunities for restaurants/bars/events that may require facilities like kitchens/ovens/fridges that aren't always suitable for outdoor pop-up markets. This would also overcome the issue of the Debenhams building being too large for most retailers (and becoming an eyesore on the marketplace), by splitting it up into a large number of smaller venues that can operate year-round." "[As per my previous answer on Inclusivity, Health and Wellbeing] I believe the end of High Street (near the Salvation Army) could be \*perfect\* as the hub for some inclusive venues catered to the LGBT community, as there are already two large pubs that are being under-used (one is boarded up, and the other [The Bitter End] is a food market) . Offering either of these spaces to a prospective tenant for a discounted rate so they can set up an inclusive venue could be an effective way to give this community a focal point to establish itself further, while breathing new life into these disused spaces in an interesting way. If this is a success, there could then be demand for more venues to open up nearby when the rest of this street is redeveloped. This community is currently very under-served in the wider area, with the closest full-time LGBT venue in London more than 10 miles away (in a straight line) in Limehouse - and I can't see any full time LGBT venue further out east into Essex until Southend! This means there is HUGE untapped demand for a venue in this area. It doesn't need to be a night-time only venue either, we could look to a venue like Dalston Superstore as a model - which does breakfast, brunch, daytime shows and evening entertainment. We also have some high profile LGBT celebrities & allies who grew up here, including Russel Tovey - who may be willing to endorse or get involved in a project like this. It would also be a novel way to meet part of the 'inclusivity, health & wellbeing' objectives while reviving these venues and bringing people through Romford centre to this destination, which is often under-explored." "I absolutely LOVE this section. These plans are so beautiful, I get excited about the future of Romford thinking about this coming true! Some excerpts from my previous

	<p>answers: I would be keen for there to be a large gym included in the Brewery/Waterloo proposals - as the Nuffield Gym (currently in the Brewery) as well as the Pure Gym would be lost in the demolition [though these don't seem to be noted in Table 18]. Having an upmarket private gym (Nuffield, Virgin Active, David Lloyd etc) would attract office workers, residents and visitors to the area - and cater to a different audience than the Sapphire centre (which is lower end). Likewise, an anchor supermarket in this area is *vital* as the current Sainsbury's is always incredibly busy - and it would also be lost in the demolition. A large Sainsbury's to replace the current offering would be essential for the residents to avoid driving to the next nearest supermarket (ASDA in the Liberty) - which isn't walkable with shopping. I would love for the sub-power station to be given some attention in these plans too. It currently backs onto the (empty) Atik nightclub - and uses some prime real-estate next to the station. With more modern technology, the footprint of this station could possibly be reduced - or it could be developed to have a public space on top of it (perhaps a raised garden, or new retail space) that could additionally make use of the arches, atik and the access on the 'Battis'. This will be particularly important if (hopefully when!) the river gets opened up and becomes desirable - as this plot of land will be right in the centre of a key area. There are mentions of Roof Gardens later in the document, but there don't seem to be any specific details of where these may be. I think proposing public roof gardens on top of the new Brewery Structures (either like RoofEast in Stratford [i.e. young, vibrant, trendy] or Kensington Roof Gardens [upmarket, family friendly]) could be a great way to use the space and get more greenery into the town center. It's probably too ambitious (although the rest of the plan is already very ambitious!) but it would be incredible if the part of the Ring Road that separates the Brewery from Waterloo could be buried. This would stop it from cutting off the west of Romford from the town centre - without impeding the flow of traffic by having lots of crossings."No, it looks great This looks lovely, and certainly this area would benefit from some high-end premium flats to compliment the housing on Waterloo. I'd like to know the plans for the walkway at the end of Cotleigh Road/Nursery Walk. It seems to be listed as an 'Active Travel Street', but it's currently very small and poorly maintained (and not very safe!). It could be significantly improved by being widened, and having some better lighting. It's also surrounded by under-used cordoned-off green-space - that could be integrated into the plans for changing the tunnel." "Thank you SO much for these plans. They're absolutely beautiful, and I hope they all come true. Plans like this made me excited for the future of the town, and I really hope to see them start to be implemented. (Especially uncovering the River Rom!! That's the most exciting plan of all of them!)"</p>	
<p>Planning consultants on behalf of the owners of the Royal Mail site</p>	<p>These representations support the Vision for Romford which seeks to deliver growth and opportunities. It is considered that the identification of the Royal Mail site for development within the site guidance for Crow Lane (ref: 6.11) would support this overall vision. The objective proposed in the draft Masterplan to increase the mix of employment uses within the town centre, to allow for enhancement of business opportunities by capitalising on the Elizabeth Line station is supported. We consider the Royal Mail site provides a prime opportunity to support this objective as it could accommodate a substantial quantum of modern employment floorspace creating business opportunities and driving economic growth. We also support the aim to create new liveable neighbourhoods within the Town Centre and consider the Royal Mail site situated between the recently completed Hollybrook residential scheme of 82 dwellings and the Former Romford Gas Works site, which is identified within the Crow Lane site guidance for residential led development, provides an opportunity to create a new attractive, cohesive and accessible neighbourhood. The masterplan seeks to promote a range of employment types, including light industrial, to attract greater employment activity and drive growth. These representations support this objective and consider that the Royal Mail site has the ability to play a key role in delivering modern, appropriate, employment floorspace. Crow Lane (ref: 6.11) is located directly adjacent to the subject site. Within the existing context for the Crow Lane site, under reference 6.11.1, it is stated that located adjacent is the: retained Royal Mail Distribution Hub In the first instance, these representations are seeking for the aforementioned wording to be removed from the In the first instance, these representations are seeking for the aforementioned wording to be removed from the (Text not copied fully) Royal Mail currently occupy the site and have recently re-gearred their lease to extend until 2031 with a rolling landlord only break from 2027. However, following lease expiry, given the lease is outside the terms of Landlord and Tenant Act (1954), the site will be available for redevelopment. Royal Mail have also asked if the landlord would consider an early</p>	<p>Response noted. As highlighted within the Masterplan, the current Royal Mail site is formally designated as a Locally Significant Industrial Location, for employment use, and the requirements for applications for this type of designation are within the London Plan and Havering Local Plan. This designation was made through the Havering Local Plan</p>

	<p>surrender should they no longer wish to remain. Given the proposed Masterplan is seeking to guide Royal Mail currently occupy the site and have recently re-gearred their lease to extend until 2031 with a rolling landlord only break from 2027. However, following lease expiry, given the lease is outside the terms of Landlord and Tenant Act (1954), the site will be available for redevelopment. Royal Mail have also asked if the landlord would consider an early surrender should they no longer wish to remain. Given the proposed Masterplan is seeking to guide 3 development for the next 20 years, it is considered important that the situation of the Royal Mail site is recognised. Moreover it is considered that the site should be identified within the Crow Lane site guidance as having potential for redevelopment. As with the adjacent Former Gasworks, the Royal Mail site benefits from being in a highly accessible location given its location circa 1 mile from Romford Train Station providing national rail and Elizabeth Line services to central London. The NPPF, at paragraph 123, the most sustainable use of land located within urban areas. The site sits on the periphery of the Town centre and comprises previously developed land in its entirety. Further the site is currently underutilised in terms of density with a large car park and yard. On the basis of both these factors it is considered the site is suitable for redevelopment. We consider that the site is suitable for both residential and commercial redevelopment. Adjacent to the east is the Former Gas Works site, for which the Crow Lane site guidance (ref: 6.11) supports the delivery of new residential development between 3 and 10 storeys to provide a medium density context transitioning to the town centre. Immediately to the west is a new residential development by Hollybrook Homes of 82 dwellings (ref: P1152.18) which was completed in 2021. As such, the site lies between existing and proposed residential development. It is evident thus that the character of the area is transitioning from its historic industrial use to a residential led mixed use area. It is considered that the site should be identified within the Crow Lane site guidance for residential led development to accord with the surrounding uses and emerging character of the area. Moreover, the allocation of the site would support the objective of the emerging Romford Town Centre masterplan which is seeking to create a new residential neighbourhood to the west of the train station whilst improving accessibility. Whilst it is considered that the site is suitable for a residential led redevelopment, we also consider it is suitable for the continuation of the existing employment use through redevelopment to provide modern flexible warehouse floorspace, which makes more efficient use of the site and will better serve the needs of the market. The existing operation of the site by Royal Mail as a distribution warehouse demonstrates the acceptability of employment uses at the site, in the context of the emerging character of the area and surrounding uses. Moreover, the site benefits from being in an accessible location, and commercial development will provide additional employment opportunities for local people supporting the objective of the Masterplan. Redevelopment of the site for employment uses would also allow for a buffer to be created next to the railway line from the proposed Former Gas Works site and the adjacent recently completed Hollybrook scheme. The site is currently within single ownership and provides a unique opportunity to link into the wider emerging character of the area and create a new desirable neighbourhood within Romford Town Centre. We consider that the site is deliverable in the medium term and has the capacity to provide circa 750 residential units or 14,000 sqm of commercial floorspace. The redevelopment of the site will also support in achieving the London Plan targets for Romford which sets a minimum target of 5,000 new homes and 500 new jobs for Romford by 2041. The Royal Mail Centre comprises an accessible brownfield site, as such in accordance with relevant adopted development Plan documents and the NPPF is considered suitable for redevelopment. The site will become available over the lifetime of the Masterplan and as the site is not bound by any constraints development will be deliverable. Conclusions We respectfully request that you acknowledge receipt of our representations and take our above comments into account. If a meeting with the Council would be useful to discuss the site, or the proposed changes, please let us know. We reserve the right to supplement these comments at a later date, if required.</p>	<p>process and the Masterplan is required to follow the local plan policies and so this designation is not able to change. It is suggested that this is raised through the Havering Local Plan update process and can then be formally considered in line with evidence and, through public consultations and an Examination in Public.</p>
<p>Transport for London (TfL)</p>	<p>"The key themes are well-balanced and a good reflection of mayoral priorities. Being one of the core principles of the London Plan, and of the MTS, we warmly welcome and strongly support active travel being one of the Masterplan's key strategies. TfL recommends that future proposals should be developed in line with the principles set out in the Healthy Streets Approach, Vision Zero Action Plan, TfL's Streets Toolkit, TfL's Leisure Walking Plan, London Cycling Design Standards (LCDS), TfL's Cycling</p>	<p>Comments welcomed. The Masterplan continues to consider the various TfL</p>

<p>Quality Criteria and Access Control guidance notes, and other relevant guidance from TfL and at national level (such as LTN 1/20) available at the time of preparing the proposals. Overall, it is positive to see a masterplan which has a strong focus on promoting public transport, walking and cycling and improvements to the public realm, alongside the development and regeneration of Romford town centre. However, it is important to note that we do have concerns on the potential loss of bus assets, as set out later in this letter, and therefore our overall support is subject to satisfactorily addressing those concerns. We welcome inclusion of specific themes around 'space and landscape' and 'movement and connectivity'. It is positive to see recognition of the interdependence between connectivity for movement, habitat linkages and urban greening. Under 'Space and Landscape', there is a case for more explicit mention of streets as important parts of the public realm, and the need for new development to contribute to street improvements. Public safety is mentioned but could be more prominent, particularly when thinking about inclusivity and wellbeing, where there could be a stronger connection with the agenda around tackling violence against women, girls and gender-diverse people. Movement and connectivity could place an emphasis on good interchange to make the reference to the improved bus network more meaningful." "The transport related Objectives are largely supported. We have the following observations. Objective MCI - Given wider aspirations to improve health and wellbeing, the wording of this objective should focus more on active travel and public transport modes. Aspiration set out here goes further than the original Liveable Neighbourhood submission as it includes peninsularisation of existing roundabouts - this aspiration is welcomed. Objectives MC3 and MC6- We welcome both of them, however they should then translate into protection of bus assets (which the individual proposals do not always succeed to do). Objective MC5- We recommend that this is amended to read 'Roll out a town centre public car parking strategy which rationalises car parking including removal of surplus, under-used or poorly located spaces optimises the number of spaces, and creates attractive car parking areas that people feel safe to use'. The objective should be linked to optimisation of land and capitalise on the very good transport links, contributing to Havering housing and employment needs. This could be a separate objective but should be mentioned nonetheless. Objective MC8- We suggest adding 'Promote active travel as an attractive alternative to vehicular travel, in line with the Healthy Streets Approach'. The objective could also include an explicit reference to the provision of cycle parking. [new] Objective MC9-A new objective should be included, to ensure that the town centre is as inclusive and safe as possible for all, including women and girls, day and night. This could be included in one of the previous objectives, but we would suggest keeping it separate to give more weight. [new] Objective MCI0 -A new objective should be included, to ensure that the proposals contribute to the Vision Zero goals to remove all serious collisions and deaths from London roads by 2041. This could be included in one of the previous objectives, but we would suggest keeping it separate to give more weight. Objective SI - We would welcome information on the Council's current situation on carbon and what work is needed to reach zero carbon. Inclusivity, Health &amp; Wellbeing- We support the inclusion of these specific objectives, especially to support and deliver active travel opportunities" The caveat to achieving the minimum factor is welcome, but might also include a reference to the quality of green space delivered - i.e. that this is more important than the score. "Romford town centre is dominated by car parking. It would appear from the Baseline report that there are over 5,300 spaces and it is warmly welcomed that the emerging proposals envisage a reduction, and in places a significant one, which we support. Something that the SPD should also explore is whether the public car parking strategy would aim to achieve the other aims of the Masterplan (i.e., making other modes more attractive to use; opening up more direct routes for active travel users). We would recommend making this a clear aim, especially as it links to Objective CT4 (Seek to redevelop or reanimate underutilised sites and buildings such as surface car parks). (5.3.2) We recommend that this is amended to read 'Rationalising Distributing sufficient car parking across the town centre including removal of surplus, under-used or poorly located spaces (from a land use optimisation perspective), locating the remaining car parking adjacent to the ring road, to reduce the dominance of private vehicles in the town centre.' (5.3.2.5) We welcome proposals to remove car parking from Market Place, although we would have concerns about the proposal 'Formalised on-street parking provision should be included as part of public realm upgrades, potentially also on the ring road.. .' This may not be the best use of kerb space and is likely to detract from the public realm. We</p>	<p>approaches and welcomes their detailed response with regard to these. There have been no major changes made to the Masterplan, however wherever feasible, minor points of clarity have been made. For example, clarifying the Healthy Streets approach and adding a new objective on safety: ensure that the town centre is as inclusive and safe as possible for all, including women and girls, day and night. The Council looks forward to continuing dialogue with TfL as the Masterplan is implemented.</p>
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recommend that on-street parking is limited to Blue Badge holders and essential loading or servicing that cannot be accommodated off street. (5.3.2.5) We note that 'As a result of improved active travel options into the town centre for journeys under 2km, car parking requirements could drop significantly.. .' We also note that 'Latest figures show there is currently an over-provision of town centre parking, with many car parks proving unattractive with under-utilised spaces most of the time...' This should be followed up by stating that the masterplan aims to free up the best sites for development, and therefore move under-used or poorly located car parking and include proposals for the redevelopment or conversion of surplus car parking to more productive uses or to enhance the public realm. (5.3.2.5) Although we support the following intention, we would recommend additional wording: 'Parking provision should be flexible where possible, and allow for a reduction in capacity over time or adaptation to alternative uses, in keeping with increases in active travel'. As stated under 5.3.2.5, on street parking is likely to detract from the public realm and should be limited to Blue Badge holders. (5.3.2.8) We note that 'Trees, segregated cycle lanes, further planting, and potentially on- street parking should all be used to help buffer buildings from the carriageway.. .' On street parking is likely to detract from the public realm and should be limited to Blue Badge holders. There are also a number of areas/sites in which the Masterplan proposes the removal of car parking which we would support as well as some areas/sites which propose a quantum of car parking. Any parking associated with new development needs to be based on London Plan and Local Plan policy which requires car free development (apart from Blue Badge parking) in Romford town centre. Romford town centre is characterised by car dominance, as a result not just of the significant provision of car parking, but also of the presence of dual carriageways (the ring road), grade separation, and lack of pedestrian and cycle permeability. The emerging masterplan seeks quite ambitious changes to this, re-characterising some of the local roads (including the ring road and its roundabouts) and increasing the active travel provision. A number of pedestrian crossings will be provided at grade. The above will nodoubt result in great challenges to consider and overcome, but in principle, we support the ambition to increase connectivity and convert underpasses into at-grade crossings. Modelling should demonstrate that the re-allocation of road space from motorised vehicles to walking and cycling would not adversely impact on bus journey times. This will be covered later in this letter in greater detail. (5.3.2.1) Care should be taken about the statement 'Bike ramps should be incorporated where necessary in public realm schemes'. 'Bike ramps' are often taken to mean wheeling ramps, i.e. channels to push wheels when walking your bike up and down steps. Clarity should therefore be given that this means proper ramps, built to standard, to allow cycles to negotiate level changes without dismounting. The inclusion of Figure 29 (a plan to show a proposed active travel network) is welcomed. There are clearly many possibilities for local streets (with unsegregated cycling), but it would be good to distinguish between those that can truly be made very attractive to walking and cycling- i.e. with more or less no through-traffic - and those where cycles will have to mix with a reasonable (but not excessive) amount of vehicular traffic. We note that Figure 31 shows some of these local streets as 'active travel streets'. The idea of some routes having dedicated cycle lanes as a compromise between segregated and low-traffic environments should be better explored given that current cycling design guidance does not promote cycle lanes unless in quite specific circumstances. On streets like Victoria Road, there is also considerable kerbside activity which means that a kerbside cycle lane may not put cyclists in the most advisable position on the carriageway. There would be a case for combining the 'walking and cycling' and 'active travel' sections, since they deal with the same issues, at slightly different scales. (5.3.2.5) Where on-street parking is advocated as part of the town centre parking strategy, it would be useful to have some guidance on what configurations of parking are acceptable, i.e. short runs of parking, divided by landscaping. This is shown in the photo from Altrincham but not described in the text. Has any testing been done of whether this kind of approach can accommodate the proposed 560-662 spaces on-street (as shown in fig.36)? (5.3.2.7) The servicing strategy might also mention the possibility of consolidation, with local delivery done by cargo cycle or other smaller vehicles. (5.3.2.9) Where street sections are shown to demonstrate potential reallocation of space on the Ring Road, it would be useful to see how pedestrian and cycle crossings could be incorporated. The proposed medians may be helpful, or they may be problematic if more width is needed at the crossing-point. The approach to tree-lined medians, which in principle can offer many benefits, also needs to be

realistic, given that they will need to be maintained - the council will need to be confident this can be done without closing the road. (5.3.2.1) Methods and types of cycling segregation should be considered depending on traffic flows, HGVs etc. and in line with the requirements of TfL's London Cycle Design Standards (LCDS) and LTN 1/20. "Improving routes for walking and cycling can often be low-intervention upgrades that can be delivered early, encouraging a shift away from the car for shorter journeys" - it is good that these interventions can be delivered earlier but need to ensure that they are integrated into wider plans and are still delivered to a high quality for all.

(5.3.2.2) Plans shows some extent of segregated cycle lanes which is positive - we encourage you to explore similar provisions on main road approaches too, based on traffic flows to ensure that the best possible cycle infrastructure is provided. (5.3.2.4) Retaining the bus movements through the town centre is welcomed, but then the second paragraph in this section mentions 'removing or reducing bus movements under the viaduct', which is a key bus link and must be retained. (5.3.2.6) 'In the longer term the Masterplan proposes peninsularisation of roundabouts to remove underpasses and introduce at-grade crossing...' - should be noted that this was the aspiration and intention of the original Liveable Neighbourhood bid. Given likely costs and disruption, we wonder whether you should be focusing on the preferred end points rather than revisit junctions twice. Links should be attractive at all times of the day and night. We welcome consideration of the safety (and perception of safety) for this connection as part of further exploration of the project. (5.3.2.8) We welcome the aspiration to re-characterise the ring road. You should ensure close coordination with TfL's Network Performance Delivery (NPD) representatives on proposals and schemes given the role of the ring road as part of the Strategic Road Network. When the document says that 'Further, implementing the approved Liveable Neighbourhood project along the western arm as a first phase...' - could it clarify if this refers to it being approved by the Council? It must be noted that TfL funding for the LN scheme remains paused. The document could highlight that a short-term measure to improve safety would be to reduce speed limits around the ring road. It would contribute towards the Vision Zero goal. As noted earlier in this letter, we support in principle the ambition to increase connectivity, and the re-allocation of road space from motorised vehicles to walking and cycling. While we are generally supportive of this, a balance will need to be taken between the benefits that this will bring, and the potential impact on bus journey times. The unknown nature of the north-south 'rapid transit link', and how much priority can be given to public transport, both add complexity to the decision of the acceptability of the proposed changes in terms of network capacity. Delays introduced by the reduction in road space will become more apparent during peak hours. The introduction of new traffic signals could balance queuing where currently the side road must wait at a give way and enter the main road (ring road) when there are gaps in the traffic. Implementing signals would potentially increase stop/starts for bus on the ring road. The introduction of at grade signalised pedestrian crossings at the roundabout/swill introduce some start/start delay, even though these will only stop traffic when a demand is inserted by a pedestrian. All in all, from a network performance perspective, both local and strategic modelling will need to be carried out to confirm the acceptability of any changes to the road network, especially on the ring road. Highway modelling will need to demonstrate that any impacts on bus journey times are acceptable. Scheme appraisal of the preferred option may need technical assurance by taking it through MAP (Modelling Audit Process). This can be decided through inception meetings with TfL's Network Performance Delivery (NPD) and Modelling & Visualisation teams. Collaboration between TfL, Havering and their consultants has already taken place for some time to tackle some of these issues, although at a smaller scale than the current proposals. Modelling, including mode shares and growth assumptions, would need to be scoped with TfL, ensuring that it is carried out following TfL guidance and aligned with TfL's growth assumptions (MoTiON). Any strategic modelling using TfL's MoTiON suite needs to be undertaken by one of our Accredited Modellers. In the avoidance of doubt, modelling will need to be carried out to assess not just vehicular (highway) impacts, but also on public transport services. Multi-modal impacts on TfL bus and rail/ London Underground services must be assessed; these will result not just from the layout changes sought, but also from the quantum of development itself. TfL look forward to continuing this collaborative working with the borough, and early engagement with our Strategic Modelling colleagues on modelling requirements is strongly recommended (StrategicModelling@tfl.gov.uk). Each proposal must then be accompanied by a Transport Assessment and need to

assess, inter alia, the impacts on each mode, and mitigation identified accordingly. Pre-application discussions with TfL Spatial Planning [spatialplanning@tfl.gov.uk](mailto:spatialplanning@tfl.gov.uk) are, once again, strongly recommended, as modelling requirements will also be discussed and agreed then. Bus provision within Romford must represent one of the key themes of the emerging Masterplan, and existing infrastructure must be protected as per London Plan policy. Bus services in Romford also contribute to its excellent public transport accessibility and to the very high PTAL (6a or 6b, the maximum, in most PTAL cells within the ring road). On this note, a previous study from TfL revealed that the PTAL would stay at a similar level even if buses were the only contributor to the PTAL (i.e. without Romford railway station). In other words, existing bus services assets are of fundamental importance and must be preserved. Over 70,000 passengers get on or off buses at bus stops in the town centre (defined as those on or inside the ring road). They represent very efficient use of land and road space as well as a bigger contributor to the town centre economy and would enable 'Good Growth' for Romford. Some comments on the proposals are provided as follows. (5.3.2.4) While the text appears to acknowledge that the existing bus stand and driver facility is at capacity and in a good location, the last sentence only suggests 'possible reprovision or relocation of these'. This must be rephrased to communicate that the bus asset 'must be retained or re-provided', and enhanced to support the future bus network requirements and 'zero emission' bus fleet. (5.3.2.9) The text should caveat that the designs for bus lanes and stops must be discussed and agreed with TfL. Any endorsement on future proposals would be subject to meeting the bus requirements, technical assurance and the journey time implications. (6.5) Atlanta Boulevard. Proposals seem to remove the existing stand, by making buses terminate at the hospital instead. There are a couple of issues with this. Firstly, the hospital should provide support to provide all the land needed to stand buses. Secondly, and importantly, the cost implications of extending all the routes will be so significant that we cannot support such a proposal, as already explained to officers in the past. (6.5.2.1) Figure 88 is misleading. Firstly, the label at the top ('reprovide bus standing spaces [...]') appears to suggest that bus standing and driver facilities can be relocated onto South Street in front of the station (where there are existing bus stops which are well placed for interchange with the rail station) and Victoria Road. The same area of South Street is also labelled as a potential public space. It gives the impression that these might be suitable locations, but this is an un evidenced assumption that has not been discussed with (or assessed by) TfL. Therefore, this should not be promoted. The 'Provide business space' label points to the existing bus asset, which suggests that the removal of the bus asset from this location is already decided, but has not been agreed by TfL. (6.5.3.3) In Figure 91, the removal of the bus interchange is promoted in favour of public realm should be removed. Proposals around Atlanta Boulevard and impacts on bus assets should be discussed with TfL (6.6) There are no references to the existing off highway bus asset at Rom Valley Way - Queens Hospital, which needs to be safeguarded (and possibly enhanced) for the future bus network. The Bus facility here is essential to the operation of bus services in this area, including serving the hospital. TfL would therefore object to its removal to an on-highway location of smaller size and without operational control or long-term property rights. As TfL has a long lease for this facility, the Council would need to get TfL's agreement before any changes could be made let alone relocation. Instead we would advocate expansion in situ. (6.6) The text appears to assume that removing the existing off-highway bus asset at Queen Hospital and replacing it with on-highway stands would be achievable. This has not been discussed with or assessed by TfL. Buses will still require a place to turnaround, and on-highway assets do not provide TfL with any security of tenure or operational control. This paragraph should be clear that this would need to be discussed with TfL and may not be viable. As TfL has a long lease for this facility the Council would need to get TfL's agreement before any changes could be made let alone relocation. Instead we would advocate expansion in situ. The South Street stand is also essential to bus operations in Romford and must not be relocated or closed as seems to be suggested and instead considered for expansion. The bus stops outside Romford station provide excellent interchange and should be retained and improved. They cannot be shared with stands." "The list of considerations, which already includes references to baby-changing and 'Changing Places' features in public toilets, might separately mention the need for public toilets in the first place. The point on public safety might usefully reference the GLA document 'Safety in Public Space'. It should also use the phrase 'disabled people' rather than 'the disabled'. The strategy for the Market Place is based on a strong vision and on

achieving high quality public realm, with the introduction of more natural landscape and spaces to rest and enjoy shade and shelter. It would be even more convincing if it set out more clearly the case for this large space to function meaningfully as a civic space when the market itself is not present. We strongly support removal of the car parking (from 160 to 0), and future iterations will need to ensure both that potential displaced parking does not diminish quality of public space elsewhere in the town centre, and that what replaces it in the Market Place is of lasting value. Future design iterations will need to explore ways to make the space feel safe for everyone after the shops are closed for the day. A stronger relationship with surrounding uses might be one way of ensuring that the strategy is broader-based and sustainable. Provision for disabled customers and residents will need to be considered. A multi-modal strategy should be identified, ensuring that the needs of those with a mobility (or other) impairment are not negatively affected by the proposals. The connections to the east, and the re-characterisation of the roundabout into a T-junction to improve active travel connections are supported in principle (subject to modelling), and future designs will need to address the significant level differences between the current pedestrian and carriageway (vertical) levels. It is unclear whether pedestrian and vehicular movements will still be grade separated. If pedestrian crossings are to be at grade, considering the fixed pedestrian level of the Tollgate House Building (under the colonnade), the carriageway levels will likely need to be re-considered in a wider area. "The site's opportunities and objectives drawing (Figure 71) omits potential crossings along the southern part of St Edward's Way. These appear in later drawings in this section, but it would be important that they are consistently shown as essential for connectivity and breaking down the severance of this part of the ring road. There is little detail on the proposed redevelopment site between Yew Tree Gardens and St Edward's Way, but it is stated that this should accommodate 300-500 public town centre car parking spaces. We would question whether this is achievable without compromising the aspiration to transform St Edward's Way with active frontages along both sides if, as is stated in Figure 72, the ground and first floor of these blocks are to be taken up with car parking. It would be helpful to prioritise the proposed streetscape interventions. For example, street trees on both sides, offering shade and shelter to the footway, and helping to provide a more pleasant walking environment alongside what will still be a busy road, should take precedence over trees in the central median, particularly if the requirement to retain the median restricts the potential width of footways and cycleways. If the median needs to be retained to support the proposed crossings, this should be clearly stated. Provision for pedestrians, and in particular the nature and the location of any new crossings should be considered in light of current, and future, desire lines. Tables 15 and 16 suggest that proposals should change parking numbers from 480 to '300- 500' spaces. Proposals must reduce the existing car parking provision, definitely not increase it, and a significant reduction is strongly recommended, if the vision behind the masterplan is to be fulfilled. In addition to its many wider benefits, a reduction would help demonstrating that any impacts resulting from the re-allocation of road space (here for example on St Edwards Way), especially on bus journey times, are acceptable." "We support the strong vision for this site, and the linear green infrastructure along an opened-up River Rom. The strategy could be stronger on asserting pedestrian and cycle priority on internal streets, for example defining a type that allows servicing access only (which could itself be timed). Proposals must retain (or re-provide) bus standing and bus driver facilities, although this this seems to be acknowledged already in the emerging masterplan. There is a reference to potential 'trams' in Figure 82 (elsewhere referred to as a 'rapid transit' link), but we need to point out that this will likely be a bus service instead, and in any event any future proposals would need to be discussed with TfL. Waterloo Road is the suggested location for bus standing and driver welfare, but again this does not equate to off-highway facilities and would create an inefficient bus network having to circumvent the Ring Road to get there. Car parking provision is expected to change from 480 spaces (incidentally the same figure as previous site) to '600-800' spaces. We note that the Baseline report refers to 1,126 spaces in the MSCP and 616 in the surface car park (Table 13); figures should then be checked for consistency. Similarly to previous site, proposals must reduce car parking. provision, not increase it. There appear to be two new car parks, and while the site is characterised by abundance of car parking, we urge officers to reconsider the proposals and reduce the car parking provision significantly. In such town centre location, adjacent to the (potential) new western entrance to Romford railway station, this site should be car free, except for



Blue Badge parking. Provision for active and sustainable travel should be prioritised. Connections to the west and to south, should be better explored. Ways to improve the existing underpass to the Bridge Close site must be explored, should improvements not be carried out as part of said development." "Romford station (Elizabeth line, Greater Anglia, London Overground) is an important interchange station within London. It was refurbished as part of the wider station upgrade programme for the Elizabeth line. In particular, the works improved the existing station entrance on South Street, in addition to platform level refurbishment works and provision of lifts (although not to all platforms). The Masterplan proposes a new entrance to the west, exiting to the area north and west of the station. Our support is conditional on the standard tests of feasibility, value and affordability through our business case framework. Capital funding would need to be identified and arrangements made to cover the operating costs associated with the operation of the new entrance. It must be noted that whilst Network Rail is the freeholder of the railway corridor, station and some surrounding land, the station itself is leased to TfL. Any new entrance would bring maintenance and renewal responsibilities which would likely fall to TfL, adding to the scope of the ongoing costs, to which we would need to be assured of funding. Therefore, to summarise, we have no objection in principle to the new station entrance, and would be happy to explore the new emerging proposals with you (and other relevant stakeholders, including Network Rail). Our support is however subject to: 1. provision of step free access to platforms, and as a minimum to platforms 1 and 2, using lifts 2. a full business case demonstrating the value for money, feasibility and affordability 3. identification of funding for the capital cost of the design and delivery of the new entrance (and, in the avoidance of doubt, TfL is not currently in a position to fund these) 4. identification of funding for the operating and renewal costs associated with the new entrance Proposals will need to be developed through a comprehensive approach, noting the existing situation with bus standing, drop offs, food retailers and the aspiration to make Atlanta Boulevard into a more pedestrian- and cycle-friendly street. Comments on bus assets have been provided earlier in this letter. In future iterations of the designs, there needs to be more flexibility in the spatial arrangement of this area, to allow bus operations to function efficiently and provide a suitable interchange with both rail services and town centre destinations. There could be more emphasis on public realm improvements at the station entrance, and on incorporating other modes, such as taxis, cycles, cycle hire and dockless modes. We support, and encourage, early engagement with TfL to unlock development adjacent to the station and railway line, including to tackle issues with buses. For example, Figure 91 appears to suggest re-routeing buses away from the rail station (a key destination in the town centre) and should definitely be discussed with TfL. Footbridge connections across the River Rom should be better explored, together with ways to retain (and improve) the existing one. Proposals should integrate those proposed as part of the Bridge Close site (which at the time of writing has not received planning permission). It is unclear whether the intention would be to relocate (or remove) the Lidl food store, and remove its car park. Either way, new proposals should comply with policy requirements, also with regard to parking. On this note, car parking is expected to be on street, and this should be clarified, in terms of its nature (pay and display/ Blue Badge/ etc). Provision should only be made for Blue Badge parking." The proposals have the potential to significantly reduce car dominance and increase provision for active and sustainable travel. Level issues relating to the current grade separation of pedestrian and vehicular movements at the Old Church roundabout must be addressed, noting the desire to introduce at grade crossings. The reduction of car parking from 770 spaces to Blue Badge only is warmly welcomed. Comments on bus assets (including the rapid transit link) have been provided earlier in the report. Proposals to enhance connectivity and provision for active travel are supported. Levels- related issues due to the current grade separation around the ring road have been mentioned earlier in the letter and should be considered in future design stages. Car parking provision is expected to reduce from 850 spaces to '600-800' spaces. We would encourage you to be more ambitious in reducing car parking provision further. Once again, this would help achieving mode shift and also reduce impacts (especially on buses) arising from the re-allocation of road space. Also in this case. proposals to enhance connectivity and provision for active travel are supported. Levels-related issues due to the current grade separation around the ring road have been mentioned earlier in the letter and should be considered in future design stages. The proposals, however, do not seem to include sufficient endeavours to improve Western Road and Junction Road. Western Road is shown accommodating a dedicated cycle lane (Figure

115), but without widening the carriageway it appears doubtful that there would be space for cycle lanes, raising a concern about how this can function as an active travel route. There are also opportunities to improve Junction Road, which has only one crossing (between Main Road and the railway line), some wide junction mouths, multiple crossovers and no provision for cycles. Car parking provision is expected to reduce from 1,000 spaces to '300-500' spaces. We would encourage you to be more ambitious in reducing car parking provision further. Once again, this would help achieving mode shift and also reduce impacts (especially on buses) arising from the re-allocation of road space. "The document seems to suggest the potential loss of the bus garage on North Street. Within this context, it should be noted that TfL and the Mayor of London (as stated in the London Plan) seek to protect bus garage capacity and support the retention and expansion of bus garages. Bus garages influence competition for bus routes helping to keep good value for the travelling public, and their location near to the start of routes also helps to keep costs down. Closure of the garage would likely add to pressure for stand space in the town centre - see point above. Sites such as Romford Bus Garage are vital to enable the bus network to operate efficiently and cost effectively. Romford Bus Garage is strategically well-placed and accessible to major roads. The garage has a capacity of approximately 100 buses and employs around 300 staff members in permanent jobs, and is therefore also a good local employer. The consultation report notes 'Should the bus garage be moved and reprovided elsewhere' (6.9.2.1)- but does not suggest alternative land the bus garage could be relocated to, which is not acceptable. The site must be retained, and TfL and the Bus Operator would welcome a further discussion about proposed plans. TfL and the Bus Operator may only consider relocating a garage if another site of a similar size (and acceptable location, in terms of potential impacts) was identified within the immediate vicinity, to accommodate current and further growth of the network - and zero-emission buses. Over 30 zero-emission buses currently operate out of Romford Bus Garage, helping to reduce emissions and improve air quality in the local area. As TfL transitions to an entirely zero-emission bus fleet, retaining sites such as Romford, where power is already available to charge zero-emission buses is crucial in the long term to maintaining current service levels and meeting growing public demand. We understand that there are aspirations to improve the quality of the public realm and connectivity to the city centre on/via North Street, and operating buses from the existing Romford Bus Garage site will play an integral role in this. The reallocation of road space to public space at the roundabout is noted, and supported in principle, subject to modelling outcome. Also in this case, there will be issues to overcome resulting from the current grade separation. Provision for pedestrians, and in particular the nature and the location of any new crossings should be considered in light of current, and future, desire lines. The 'active travel link' along the River Rom may benefit from a crossing on St Edwards Way in its proximity, although this will need to be considered in the context of the new one proposed to the east (by the new signalised T-junction). Issues relating to the Bus Garage have been mentioned earlier in the letter. The provision of accessible parking only is noted and supported." Previous comments made on reallocation of road space for adjacent sites apply here too. The provision of on street parking only is noted, and should only be for disabled users. More consideration needs to be given to the onward active travel connections. Figure 139 shows a cycle route passing through the existing mini-roundabout at the end of Nursery Walk, which would need a significant upgrade to be safe for cycling. Dagenham Road is shown as having cycle lanes, but this would be challenging to achieve with a high level of service for cycles, given that it is a bus route with considerable kerbside activity. It would need other measures, such as 20mph limit and, potentially, speed reduction measures. Similarly, Oldchurch Road would be difficult to make safe for cycling. It is likely there would need to be a higher degree of separation than cycle lanes. Any future proposals should also consider the whole Union Street corridor, as it would be the key desire line to Romford town centre (and station) once the Bridge Close site, new crossing on Waterloo Road and footbridge over the River Rom, are constructed. Daytime and night time Active Travel Zone (ATZ) improvements along this street will need to be considered. "Thank you for giving Transport for London (TfL) the opportunity to comment on the Romford Town Centre Masterplan (Final Consultation Draft, dated 22 August 2024). The document provides 'a framework for the delivery of good growth over the next 15-20 years, setting out a vision for Romford supported by objectives, strategies, and site guidance' (1.1.2). Once adopted, this will represent a Supplementary Planning Document (SPD) that sits alongside and

supplements the Havering Local Plan, providing a material consideration to help determine planning applications within the masterplan area. Please note that these comments represent the views of TfL officers and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority (GLA), who we understand have prepared a separate response. This letter does not necessarily reflect their view on the emerging proposals. The London Plan was published in March 2021. Local plan policies and site proposals should be developed in line with relevant London Plan policy which supports the implementation of the Mayor's Transport Strategy (MTS). In particular, it is important that local plans, SPDs and development proposals support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network. The consultation document is quite extensive (228 pages), and detailed in places. It covers the vision and some general principles that should guide development proposals in Romford and more detailed emerging proposals for some specific sites. This response will endeavour to provide comments on each section of the consultation document. However, each development proposal (planning application) will then be subject to more in-depth review and consideration once these come forward. TfL invites applicants to engage with TfL Spatial Planning at an early stage of the development of their site proposals. Any impacts on bus routes resulting from the Masterplan, and particularly from the changes to the Ring Road and its junctions will need to be discussed and agreed with TfL Buses, and we recommend early engagement. TfL have been broadly supportive of the proposals for the Ring Road to date, e.g. the ability for the 252 services to turn right straight into Mawney Road. On the one hand, the removal of roundabouts will bring many benefits, but on the other roundabouts do allow bus routes to turn round and head back in the opposite direction efficiently. Retaining this functionality is key. Wanting a reduced number of traffic lanes is also understandable, especially if reallocated to bus lanes. However existing on-highway bus stands near Mercury Gardens will need protecting. On Western Road, it would appear that the masterplan envisages buses in one direction only, and instead using Victoria Road. As part of this, the bus stopping area near the station would be lost and relocated to Victoria Road. This would degrade access to the station and the shops - both major passenger destinations - as well as make where to catch your bus less intuitive. The north - south 'rapid transit' (bus) link through the town centre is something we would be happy to continue to explore with the Council. It appears that the preference is for an alignment to the west of the town centre. Although likely quicker for through passengers, it means not serving key passenger destinations (railway station and shops). Therefore, this alignment is not likely to be maximising passenger benefit. However, we would be pleased to continue the conversation to find the best solutions for Romford and further afield. On Crow Lane, TfL aspire to two-way bus operations along this road. Acknowledging constraints further afield, the masterplan should provide passive provision of bus stops in their plans should we ever overcome the physical constraint at the western end of Crow Lane. We would welcome opportunities to discuss the issues above. Design guidance is provided for ten opportunity sites: the Market Place, St Edwards Way, the Brewery, Station Gateway, Rom Valley, the Liberty, the Mercury, North Street, Civic Campus and Crow Lane. The following section will add some initial considerations on each site, but in general, while there will be some challenges to overcome (for example in relation to buses), TfL strongly supports the redevelopment of the ten sites; this is mainly on the basis that, mostly, they currently prioritise access by car, not only in terms of a surface and multi storey car park, and are characterised by limited provision for active travel. While it is welcomed that consideration at a such early stage is given to the potential for development at these sites, it should be noted that detailed, bespoke pre-application conversations should take place on each site (or sub-site). Each proposal will need to be considered on its merits, accompanied by a Transport Assessment (and other supporting reports as appropriate), to be developed in line with TfL guidance. Development proposals will need to comply with the prevailing London Plan policy requirements. Impacts (including modelling) and mitigation will need to be considered on a case-by-case basis. Individual proposals will need to adhere with the prevailing car and cycle parking standards, and car-free

	<p>developments (except for disabled) are recommended, even when maximum standards would allow for some car parking provision. This is also on the basis of the abundance of car parking elsewhere in Romford (5,323 spaces at present, based on the Baseline report). Cycle parking provision will not be mentioned in the responses for each site, as it is expected that will be provided in line with policy and with the London Cycle Design Standards. Similarly, servicing requirements will need to be considered on a case-by-case basis. Provision should be made for cargo bikes, for all uses. As such, these comments should only be seen as high-level review of the principle of development at each, and are indeed subject to further consideration in due course. We would welcome further opportunities to help shaping them up so that they would represent Good Growth for Romford (and London) and meet the MTS targets.</p> <p>Implementation and funding - While we largely support the emerging proposals (except for the impact on our bus assets), implementation and funding will need more consideration. There are multiple references to the Liveable Neighbourhoods (LN) programme for the ring road that TfL awarded to Havering included as a source of funding in section 7.4.2. The funding that was allocated through that for the Ring Road is no longer accessible. (7.4.2) The document expresses that TfL withdrew its funding in 2021 and the aim is now to deliver the scheme in smaller phases that are being funded from developer's S106 contributions, CIL and other external funding. As noted above, TfL funding for the LN scheme remains paused. It should also be noted that TfL's COVID-19 response Streetspace project is no longer a 'live' funding programme. Earlier in the letter we have set out that any potential support for a western entrance to Romford Station would be subject to funding and approvals. Funding for the north south public transport link should similarly be investigated. We are supportive of using CIL and s106 to fund transport improvements associated with key development sites as opposed to depending on TfL funding for transport improvements. Conclusion - Thank you once again for consulting TfL on the Romford Masterplan. We look forward to continuing our work together in helping you develop the emerging proposals for the town centre. The proposals have great potential to enable 'Good Growth' for the town centre, Havering and the whole of London. As noted throughout this letter, we are largely supportive of many of the principles behind the emerging Masterplan. The vision to enhance active and sustainable travel in the town centre, and the associated reduction in car dominance, are noted and strongly supported. However, bus assets must be protected, car parking should be further reduced and implementation and funding, including to the new western entrance to Romford railway station, better explored. We are committed to continuing to work closely with GLA colleagues to help deliver integrated planning and make the case for continued investment in transport capacity and connectivity to unlock further development and support future growth in Havering and across London."</p>	
<p>Planning Consultant on behalf of the owners of the Brewery (map also submitted )</p>	<p>The Status of the Draft SPD In considering the draft SPD, it is important to understand its status for plan-making and decision-making purposes in the event that was to be published by the Council. The Planning Practice Guidance ("PPG") sets out the role of SPDs: "SPDs should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development".</p> <p>Paragraph 008 Reference ID: 61-008-20190315 Therefore, it is important to highlight that SPDs should only provide guidance on how to interpret policies in the adopted Local Plan and SPDs must balance aspirational objectives against whether this would render development unviable or not. Ultimately, it is our judgement that the Council must both be bolder in providing a more ambitious masterplan, whilst also acknowledging the viability challenges that currently inhibit development in Havering to ensure that the SPD deliverable. This is vital as the SPD is not subject of the usual tests of soundness as part of a Local Plan examination. Below we outline our client's concerns and provide recommendations for how the SPD could be updated accordingly. The adopted Local Plan In this context, it is important to note that the adopted Plan for Havering comprises:</p> <ul style="list-style-type: none"> <li>• The London Plan (2021)</li> <li>• The Havering Local Plan 2016 – 2031 (2021)</li> <li>• Polices Map North and South (2021)</li> <li>• Joint Waste Development Plan 2012</li> <li>• Site Specific Allocations DPD 2008</li> <li>• Site Specific Allocations in the Romford Area Action Plan 2008</li> </ul> <p>The Local Development Scheme ("LDS") 2023 confirms that the Local Plan 2016 – 2031 does not include Site Specific Allocations and for this reason the Site Specific Allocations DPD 2008 and the site allocations in the Romford Area Action Plan 2008 are retained until they are replaced. The Site is covered by the following</p>	<p>Support noted. The Local Planning Authority welcomes the opportunity to engage in pre application discussions regarding the development opportunities on this key site. In response to the specific comments raised, the car parking figures have been updated.</p>

designations under the adopted Local Plan: • London Plan o Elizabeth Line East, Romford Opportunity Area 3 • Havering Local Plan o Within Romford Strategic Development Area; o Within Romford Metropolitan Area; o River Rom runs through the Site (Culvert); and o Flood Zone 2 London Plan Policy SD1 of the London Plan ('Opportunity Areas') identifies the Opportunity Areas. These are defined as significant locations with development capacity to accommodate new housing, commercial development and infrastructure, linked to existing or potential improvements in public transport connectivity and capacity. Under this Policy, the Mayor of London will provide the support and leadership to ensure that Opportunity Areas deliver their growth potential for Londoners and he will promote and champion the areas as key locations for investment. Accordingly, Policy SD1 establishes that to ensure that Opportunity Areas fully realise their growth and regeneration potential, the Mayor will set out a clear strategy for accommodating growth and will support regeneration. Additionally, the Mayor will bring together the range of investment and intervention needed to deliver the vision and ambition for the area. At a local level, Boroughs through Development Plans and decisions should clearly set out how they will encourage and deliver the growth potential of Opportunity Areas and support development which creates employment opportunities and housing choice for Londoners. They should additionally plan for and provide the necessary social and other infrastructure to sustain growth and create mixed and inclusive communities, working with infrastructure providers where necessary. The Site is located within the Elizabeth Line East, Romford Opportunity Area and the London Plan sets an indicative capacity of 5,000 new homes and 500 jobs to be delivered here. The supporting text confirms that the Elizabeth Line East will transform connectively along the route, is already leading to increased development and has the potential to bring forward growth and development from Stratford eastwards. Havering Local Plan Policy 1 of the Havering Local Plan 2016 - 2031 ('Romford Strategic Development Area') confirms that over the plan period, the Council will support the delivery of over 6,000 new high-quality homes within the Romford Strategic Development Area in well managed residential and mixed-use schemes that provide attractive places to live which are well integrated within the existing community. The extract below shows Romford Metropolitan Centre which located within the Strategic Development Area with the Site approximately outlined. This shows that the Site occupies a prime and strategically important location within both the Metropolitan Centre and the Strategic Development Area. 4 Extract 1: Romford Metropolitan Area Additionally, to strengthen Romford's role as a designated Metropolitan Centre and to realise its potential as one of Outer London's largest and most successful town centres, the Council will support development proposals within the town centre boundary that: • Reinforce South Street as the main shopping street and spine of activity in the town centre; • Diversify and improve the quality of the retail, cultural and leisure offer that contribute to the daytime and evening economies; • Provide new modern retail units or refurbishment of existing retail units; • Positively transform the Market Place into a high quality civic space, accommodating a reconfigured, successful and vibrant market with a re-imagined public space and an enhanced retail and restaurant offer; • Create a vibrant mix of commercial uses adjacent to the station; • Accommodate mixed uses, with residential and commercial space provided above ground floor level where this does not prejudice the operation of the ground floor for retail and town centre activity; • Provide new, fit for purpose office development as part of mixed-use schemes; and • Provide affordable office accommodation within or funded by new commercial and mixed use developments. The supporting text confirms that the Brewery forms an important part of the retail offer within Romford but that it turns its back to the centre. Better integration between the two is therefore required, including a coordinated public realm programme to strengthen east-west connections. Opportunities for new development around the Brewery that intensify existing uses should be explored. However, aside from this, the Policy is relatively silent on how the Brewery Site should be redeveloped. Therefore, the draft SPD should be brought forward showing how those adopted policies are complied with. "The vision and objectives of the draft SPD The Vision for Romford We are fully supportive of the vision for Romford as set out in the draft SPD: • "Building on its unique character and history, Romford will be a mixed, vibrant and distinct town centre. It will consist of a refined retail offer complemented by a rejuvenated market, with a focus on local goods and services, maintaining its role as a major leisure destination, with an enlarged employment offer, an early evening food and beverage offer and new residential community supported by additional health and school facilities." Clearly, the vision is in

accordance with Policy 1 of the adopted Local Plan in terms of promoting residential development and commercial development and also endorsing the strengthening of Romford's role as a metropolitan centre and to realise its potential as one of Outer London's largest and most successful town centres. Crucially, the vision acknowledges that the introduction of residential use is a vital component of this. However, we do not consider the vision to be realised by the draft Masterplan. This is because it needs to be more realistic (with reference to viability) and more ambitious in terms of scale given Crossrail and the Metropolitan Centre status if the vision is to be realised. These points are discussed in further detail in this letter. Whilst we are supportive of the Masterplan key moves and objectives in general, we do raise several concerns which we address below under specific Site Guidance provided for the Brewery. In terms of uses and mix, the objectives are supported in terms of: • Strengthening Romford's Metropolitan Town Centre status; • Diversifying the range of uses; • Encouraging the expansion of Romford's arts and culture scene; • Encouraging additional office space around Romford Station and other business space; and • Optimising the amount of housing, to provide much needed new homes, provide activity throughout the day and aid financial viability of mixed-use schemes. To ensure compliance with the Local Plan, it is recommended that further clarity is provided to ensure that it is clear that the SPD relates to the Strategic Development Area rather than just to the town centre. At present, the title of the SPD is confusing as it appears to relate only to the town centre. However, at 1.1.2 it is confirmed that the "masterplan focuses on a core area in and immediately around the town centre, with some strategic covering the SDA area". Whilst this point is discussed below, concern is also raised regarding the opening up of the River Rom and the feasibility of this: • "Key move: The River Rom will be deculverted and partially renaturalised through the town centre to create an ecological linear park". Concern is also raised regarding the new station entrance and the feasibility of this: • "Key move: Creating a new station with an attractive public spaces that acts as a gateway to the town centre and improving the existing station entrance with public realm enhancements, seating and wayfinding". To avoid duplication, we will set out our concerns in relation to opening up of the River Rom and the new and improved station entrances when assessing the Site Guidance for the Brewery" Extent of de-culverting the River Rom The indicative public open space provision and locations (figure 81) indicative plan shows the deculverting of the River Rom throughout the centre of the Site. At 6.4.3.2 it is stated that "development should take full advantage of the Rom by creating a lush green landscape that celebrates the water course, opens it up for public access and improves biodiversity. Each of the plots identified must provide a public open space, along the Rom and within the block structure, incorporating both hard and soft public spaces." The deculverting of the River Rom through the Brewery site is only achievable if it is viable to deliver. It may be possible to unlock this through the delivery of development and the Masterplan should facilitate this. However, the current approach - which inhibits heights and assumes the demolition of existing retail - is unlikely to make the deculverting financially viable. It is clear that the Council have not undertaken the necessary technical work to identify whether or not this is a viable option. This is confirmed in the consultation document at section 7.4.5 ('Infrastructure projects'): • Project: Deculverting sections of the River Rom in Romford town centre, to include fluvial flooding mitigation strategy: o Description: this is a pipeline project which needs to be further developed in terms of potential project scope and routes to delivery. o Project status: funding not confirmed. o Delivery timescales: TBC o Estimated project cost: not known. Conversely, Schrodgers have undertaken a significant amount of technical feasibility work at an early stage of design and it is evident from this that the deculverting the entirety of the River Rom throughout the Site would be extremely costly and difficult to deliver from both a technical and a cost perspective. The draft SPD as currently worded targets the opening up and deculverting of the River Rom through the entire site. The Masterplan should be amended to support the deculverting of the River Rom as much as feasible and viable. LBH should also undertake additional technical work to support their proposals. "Parking The key deliverables table identifies public town centre car parking of 600 – 800 spaces to be delivered on the Site. However, it is unclear as to how this figure has been derived at and how it relates to specific parking for other uses proposed within a redevelopment scheme. As an example, whilst it is anticipated that any residential development would be car-free in accordance with London Plan Policy T6 ('Residential parking), this is with the exception of disabled persons car parking and therefore some provision would be required. We therefore require further detail on the

car parking and how this relates to specific uses. New station entrance The indicative street hierarchy, access and route networks (figure 82) indicative plan and the illustrative plan with key existing and proposed character features (figure 83) both show a new station entrance at the southern end of Brewery Gardens to encourage footfall along the Rom and through the railway viaduct. It does not appear that the feasibility of this has not been properly assessed by the Council. Schroders on the other hand have undertaken a technical assessment of this and can confirm that the viability implications of this would be extremely high and would likely render a redevelopment scheme unviable and undeliverable. The section of the SPD relating to infrastructure projects states:

- Project: Romford Station improvements including new second entrance to station (just off South Street)
- o Description: project to deliver improvements to Romford Station, including improved public realm, a new station entrance at Brewery Gardens, and improvements to ticketing hall. Improvements to the ticketing hall are underway, and a Schedule 7 Planning Application was submitted to the Council as Havering's Local Planning Authority.
- o Project status: ongoing: progressing as planned.
- o Delivery timescales: Delivered.
- o Estimated project cost: £3,500,000

Schroders would welcome further information on the estimated project cost as the feasibility work carried out by Schroders indicated that costs would be significantly higher than this. It is also not clear how much the new entrance would cost in isolation from the other Romford Station improvements (i.e. how much of the £3,500,000 relates to the new entrance). It is also unclear from the site-specific guidance whether it is expected that the redevelopment of the Brewery would fund this new entrance or whether it would be expected to contribute (likely secured through a S106 legal agreement) along with other developments that are coming forward in the Town Centre that would benefit from the new entrance. If the former and it is the case that the Brewery would be expected to fund this alone, we would again direct the Council towards the PPG."

Within the Character and Townscape Theme there is discussion of contextual height and massing (section 5.6.2.2.). It is set out here that new buildings must respect the setting of Romford and its historic character and that to preserve the existing character and townscape qualities, heights of new buildings should be in-line with the diagram 53 (height strategy). The draft SPD sets out that at its centre (in and around the Romford Conservation Area) is an area suitable for 2 – 5 storeys, closely aligned with the heights of existing buildings and heritage assets. Across the rest of the town centre and its vicinity is an area suitable for 4 – 6 storeys, with buildings of compact urban form and a mid-rise townscape. In specific areas it is suitable for buildings of 4 – 8 storeys with potential for some taller elements over 8 storeys. The frequency of taller elements should not be so great as to become the predominant height datum, requiring instead the predominant height to remain at 4 – 8 storeys. Taller elements will also be required to demonstrate their appropriateness for consideration by way of (1) the location of the scheme, (2) the design quality of the scheme and (3) the community benefits from the scheme. We consider this approach to be unnecessarily restrictive to heights in the Town Centre and conflictive with delivering 'transformational change' on key sites such as The Brewery. To ensure compliance with the Local Plan, specifically Romford's location in an Opportunity Area benefitting from Crossrail, this guidance should be revised to not inadvertently restrict the scope for high density housing to be delivered, which is fundamentally necessary for Romford to deliver sufficient housing in the town centre. For example, our client has demonstrated to the Council through VuCity analysis that an alternate solution can be achieved on the Site that would retain the majority of the existing retail whilst delivering housing in a series of higher density, tall buildings that would be appropriate in principle. In any case the potential impacts of a future proposal would be assessed on its own merits as part of the Council's consideration of a planning application. This section of the SPD should be revised to remove the currently restrictive cap on building heights for The Brewery to better reflect what can be achieved on the Site. As noted previously, Schroders ultimate aim is to transform the Brewery Site into a vibrant mixed-use scheme, through the optimisation of the retail and leisure uses and the delivery of residential development. It is therefore strongly supported that the Site has been identified as a key area within the Masterplan and one of several that offer the most potential to deliver positive, transformational changes and be instrumental in the delivery of the overarching and vision for Romford. In general, our client is supportive of the vision for the Site with specific reference to the overarching principles:

- "Deliver a predominantly commercial development of retail, leisure / culture and business uses that maintains the Brewery's role as a primary destination in Romford, with potential for civic uses, an expanded employment

offer and / or housing at ground and on upper floors, with the Rover Rom forming the central focus of the area. New high-quality development provides attractive views in to Romford for people arriving by train in to Romford Station, and along Waterloo Road strengthens links with South Street and the High Street, safeguards and enhanced heritage assets, creates an attractive frontage to Waterloo Road and is centred around an attractive north-south open space which celebrates the River Rom". Specifically, we agree that The Brewery is a primary destination in Romford and should rightfully be acknowledged as such given its strategic importance to delivering the Masterplan vision. In terms of land uses, we agree that the redevelopment should enhance town centre activity and vitality by re-providing a retail and food & beverage focus alongside leisure uses, seeking to re-provide a similar quantum of floorspace to that which is currently on the Site. In general, the quantum of development identified for the Site is broadly agreed with, although the development principles listed by the Council could inadvertently inhibit development coming forward. " The SPD states that "it is anticipated that further analysis and design work would take place on a site-by-site basis as these (the key areas) come forward for redevelopment". This is an important caveat as it acknowledges that commercial viability will need to be assessed on each site, but this is a limitation of the SPD which goes on to set a number of commitments for the Site to deliver. It is necessary for the SPD to more explicitly acknowledge viability and deliverability as a relevant consideration which is currently being overlooked. Firstly, whilst not being an issue with the proposed allocation, it is noted that in the existing Brewery uses it is set out that there is a public car park (Angel Way car park) which has 480 spaces. This is not correct and the total number of spaces across the Site is 1,742 spaces. This includes 616 in the surface level car park and 1,126 on the multi-storey. There are also 82 disabled parking spaces. We also raise several issues with the proposed guidance which would seriously undermine viability and the harm the extent to which development could come forward on the Site in a way which would optimise potential. Existing Retail We note that the site opportunities and objectives (figure 79) indicative plan assumes a reconfigured retailing offering fronting Exchange Street. Given the existing layout, such a scheme would necessitate the demolition of the existing development in its entirety and the comprehensive redevelopment of the Site. It should not be assumed that this is the format in which development will come forward on the Site. In discussions to date our client has presented a solution which retains the existing units backing onto Exchange Street, with development located on the existing surface car park for example. Other land uses In the key deliverables table, the site-specific guidance refers to: • The provision of community uses (100sqm); • A primary school (three form entry); • Healthcare provision (1,500sqm); and • Cultural uses (13,000 – 15,000sqm but mixed in with leisure) It is unclear where the requirement for these uses comes from and the evidence base underpinning their requirement. It is also unclear whether the intention is for the primary school and healthcare provision to be entirely funded by the redevelopment or whether other strategically important developments in the Town Centre would also contribute to the funding and it is just that the Brewery has been identified as an ideal site. It is noted that Policy 1 of the Local Plan states that in relation to social infrastructure, development proposals that generate a primary school yield equivalent to one additional form of entry will be expected to provide adequate space on site for the provision of a school. The Council will only support proposals without this provision where it can be robustly demonstrated that existing or planned education provision can cater for the additional demand for school places. No evidence has been provided that would indicate that the delivery of the Brewery would necessitate a primary school yield equivalent to one additional form of entry and additional feasibility work needs to be undertaken to confirm this. It is also clear that no work has been done which confirms the relationship between other schools being provided in the Strategic Development Area. The relationship between the SPD and the infrastructure projects is also unclear: • Project: 2FE primary school needed in Romford area. o Description: the need for a new primary school in the Romford area is outlined in the Romford Masterplan, and as part of redevelopment of existing major sites in Romford including Seedbed and Homebase. The approved planning application for the Seedbed Centre on Rom Valley Way allows some area for the future provision of a new primary school (planning ref. P2072.22, P2071.22). o Project status: funding not confirmed. o Delivery timescales: not know. o Estimated project cost: £12,000,000. Currently, the site-specific guidance is extremely light on detail and evidence base and therefore we again reiterate the role of SPDs as set by the PPG. If



	<p>these other uses are a requirement of the redevelopment of the Site then they add an unnecessary financial burden without providing any justification. SUMMARY &amp; CLOSINGS Ultimately, Schroders are supportive of the SPD overall and welcome the recognition that the Brewery Site as a key area offers the most potential to deliver positive, transformational changes which is instrumental to the delivery of the overarching objectives and vision for Romford is supported. However, several concerns are raised in relation to the site-specific guidance with particular reference to the purposes of the SPDs as established by the PPG. The concerns can be placed into two categories: • Key concern 1: the SPD is not ambitious enough on scope for delivering development; and • Key concern 2: equally, the SPD does not give enough consideration to the viability and the impact of this on the delivery of the sites. Our intention is to enter into further pre-application discussions with the Council to discuss the redevelopment further and to assist in guiding the formulation of the SPD. A submission has recently been made to the Council and Schroders look forward to progressing these discussions with the Council. In light the concerns flagged as part of this consultation, it is considered that a further round of consultation should be undertaken to ensure that key stakeholders – such as our client – are actively involved in the formulation of the SPD. This will help to ensure that development is actually deliverable and viable, which currently is not the case. Should you have any queries or require additional information at this stage, please do not hesitate to contact"</p>	
<p>Planning Consultants on behalf of the owners of Bridge Close Regeneration LLP</p>	<p>The Status of the Draft SPD In considering the draft SPD, it is important to understand its status for plan-making and decision-making purposes in the event that was to be published by the Council. The Planning Practice Guidance ("PPG") sets out the role of SPDs: • "SPDs should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development". o Paragraph 008 Reference ID: 61-008-20190315 Therefore, it is important to highlight that SPDs should only provide guidance on how to interpret policies in the adopted Local Plan and SPDs must balance aspirational objectives against whether this would render development unviable or not. Ultimately, it is our judgement that the Council must both be bolder in providing a more ambitious masterplan, whilst also acknowledging the viability challenges that currently inhibit development in Havering to ensure that the SPD deliverable. This is vital as the SPD is not subject of the usual tests of soundness as part of a Local Plan examination. Below we outline our client's concerns and provide recommendations for how the SPD could be updated accordingly. The adopted Local Plan In this context, it is important to note that the adopted Plan for Havering comprises: • The London Plan (2021) • The Havering Local Plan 2016 – 2031 (2021) o Polices Map North and South (2021) • Joint Waste Development Plan 2012 • Site Specific Allocations DPD 2008 • Site Specific Allocations in the Romford Area Action Plan 2008 The Local Development Scheme ("LDS") 2023 confirms that the Local Plan 2016 – 2031 does not include Site Specific Allocations and for this reason the Site Specific Allocations DPD 2008 and the site allocations in the Romford Area Action Plan 2008 are retained until they are replaced. The Site is covered by the following designations under the adopted Local Plan: • London Plan o Elizabeth Line East, Romford Opportunity Area 3 • Havering Local Plan o Within Romford Strategic Development Area; o Within Romford Metropolitan Area; o River Rom runs through the Site (Culvert); and o Flood Zone 2 London Plan Policy SD1 of the London Plan ('Opportunity Areas') identifies the Opportunity Areas. These are defined as significant locations with development capacity to accommodate new housing, commercial development and infrastructure, linked to existing or potential improvements in public transport connectivity and capacity. Under this Policy, the Mayor of London will provide the support and leadership to ensure that Opportunity Areas deliver their growth potential for Londoners and he will promote and champion the areas as key locations for investment. Accordingly, Policy SD1 establishes that to ensure that Opportunity Areas fully realise their growth and regeneration potential, the Mayor will set out a clear strategy for accommodating growth and will support regeneration. Additionally, the Mayor will bring together the range of investment and intervention needed to deliver the vision and ambition for the area. At a local level, Boroughs through Development Plans and decisions should clearly set out how they will encourage and delivery the growth potential of Opportunity Areas and support development which creates employment opportunities and housing choice for Londoners. They should additionally</p>	<p>Response welcomed. Clarification amendments have been made with regard to Livable Neighbourhoods and BNG. With regard to the possible use of the Calnan site for the HIC, it considered that the text should remain as proposed in the Masterplan in order to address development proposals that may or may not come forward at this this location, whilst acknowledging the Local Listing of the historic asset on the site.</p>

plan for and provide the necessary social and other infrastructure to sustain growth and create mixed and inclusive communities, working with infrastructure providers where necessary. The Site is located within the Elizabeth Line East, Romford Opportunity Area and the London Plan sets an indicative capacity of 5,000 new homes and 500 jobs to be delivered here. The supporting text confirms that the Elizabeth Line East will transform connectively along the route, is already leading to increased development and has the potential to bring forward growth and development from Stratford eastwards. Havering Local Plan Policy 1 of the Havering Local Plan 2016 - 2031 ('Romford Strategic Development Area') confirms that over the plan period, the Council will support the delivery of over 6,000 new high-quality homes within the Romford Strategic Development Area in well managed residential and mixed-use schemes that provide attractive places to live which are well integrated within the existing community. The extract below shows Romford Metropolitan Centre which located within the Strategic Development Area with the Site approximately outlined. This shows that the Site occupies a prime and strategically important location within both the Metropolitan Centre and the Strategic Development Area. 4 Extract 1: Romford Metropolitan Area

Additionally, to strengthen Romford's role as a designated Metropolitan Centre and to realise its potential as one of Outer London's largest and most successful town centres, the Council will support development proposals within the town centre boundary that:

- Reinforce South Street as the main shopping street and spine of activity in the town centre;
- Diversify and improve the quality of the retail, cultural and leisure offer that contribute to the daytime and evening economies;
- Provide new modern retail units or refurbishment of existing retail units;
- Positively transform the Market Place into a high quality civic space, accommodating a reconfigured, successful and vibrant market with a re-imagined public space and an enhanced retail and restaurant offer;
- Create a vibrant mix of commercial uses adjacent to the station;
- Accommodate mixed uses, with residential and commercial space provided above ground floor level where this does not prejudice the operation of the ground floor for retail and town centre activity;
- Provide new, fit for purpose office development as part of mixed-use schemes; and
- Provide affordable office accommodation within or funded by new commercial and mixed use developments.

The supporting text confirms that the Brewery forms an important part of the retail offer within Romford but that it turns its back to the centre. Better integration between the two is therefore required, including a coordinated public realm programme to strengthen east-west connections. Opportunities for new development around the Brewery that intensify existing uses should be explored. However, aside from this, the Policy is relatively silent on how the Brewery Site should be redeveloped. Therefore, the draft SPD should be brought forward showing how those adopted policies are complied with. "The vision and objectives of the draft SPD The Vision for Romford We are fully supportive of the vision for Romford as set out in the draft SPD: • "Building on its unique character and history, Romford will be a mixed, vibrant and distinct town centre. It will consist of a refined retail offer complemented by a rejuvenated market, with a focus on local goods and services, maintaining its role as a major leisure destination, with an enlarged employment offer, an early evening food and beverage offer and new residential community supported by additional health and school facilities." Clearly, the vision is in accordance with Policy 1 of the adopted Local Plan in terms of promoting residential development and commercial development and also endorsing the strengthening of Romford's role as a metropolitan centre and to realise its potential as one of Outer London's largest and most successful town centres. Crucially, the vision acknowledges that the introduction of residential use is a vital component of this. However, we do not consider the vision to be realised by the draft Masterplan. This is because it needs to be more realistic (with reference to viability) and more ambitious in terms of scale given Crossrail and the Metropolitan Centre status if the vision is to be realised. These points are discussed in further detail in this letter. Whilst we are supportive of the Masterplan key moves and objectives in general, we do raise several concerns which we address below under specific Site Guidance provided for the Brewery. In terms of uses and mix, the objectives are supported in terms of:

- Strengthening Romford's Metropolitan Town Centre status;
- Diversifying the range of uses;
- Encouraging the expansion of Romford's arts and culture scene;
- Encouraging additional office space around Romford Station and other business space; and
- Optimising the amount of housing, to provide much needed new homes, provide activity throughout the day and aid financial viability of mixed-use schemes. To ensure compliance with the Local Plan, it is recommended that further clarity is provided to ensure that it is clear that the SPD

relates to the Strategic Development Area rather than just to the town centre. At present, the title of the SPD is confusing as it appears to relate only to the town centre. However, at 1.1.2 it is confirmed that the “masterplan focuses on a core area in and immediately around the town centre, with some strategic covering the SDA area”.

Whilst this point is discussed below, concern is also raised regarding the opening up of the River Rom and the feasibility of this:

- “Key move: The River Rom will be deculverted and partially renaturalised through the town centre to create an ecological linear park”.

Concern is also raised regarding the new station entrance and the feasibility of this:

- “Key move: Creating a new station with an attractive public spaces that acts as a gateway to the town centre and improving the existing station entrance with public realm enhancements, seating and wayfinding”.

To avoid duplication, we will set out our concerns in relation to opening up of the River Rom and the new and improved station entrances when assessing the Site Guidance for the Brewery”

Extent of de-culverting the River Rom

The indicative public open space provision and locations (figure 81) indicative plan shows the deculverting of the River Rom throughout the centre of the Site. At 6.4.3.2 it is stated that “development should take full advantage of the Rom by creating a lush green landscape that celebrates the water course, opens it up for public access and improves biodiversity. Each of the plots identified must provide a public open space, along the Rom and within the block structure, incorporating both hard and soft public spaces.”

The deculverting of the River Rom through the Brewery site is only achievable if it is viable to deliver. It may be possible to unlock this through the delivery of development and the Masterplan should facilitate this. However, the current approach - which inhibits heights and assumes the demolition of existing retail - is unlikely to make the deculverting financially viable. It is clear that the Council have not undertaken the necessary technical work to identify whether or not this is a viable option. This is confirmed in the consultation document at section 7.4.5 (‘Infrastructure projects’):

- Project: Deculverting sections of the River Rom in Romford town centre, to include fluvial flooding mitigation strategy:
  - o Description: this is a pipeline project which needs to be further developed in terms of potential project scope and routes to delivery.
  - o Project status: funding not confirmed.
  - o Delivery timescales: TBC
  - o Estimated project cost: not known.

Conversely, Schrodgers have undertaken a significant amount of technical feasibility work at an early stage of design and it is evident from this that the deculverting the entirety of the River Rom throughout the Site would be extremely costly and difficult to deliver from both a technical and a cost perspective. The draft SPD as currently worded targets the opening up and deculverting of the River Rom through the entire site. The Masterplan should be amended to support the deculverting of the River Rom as much as feasible and viable. LBH should also undertake additional technical work to support their proposals.

“Parking The key deliverables table identifies public town centre car parking of 600 – 800 spaces to be delivered on the Site. However, it is unclear as to how this figure has been derived at and how it relates to specific parking for other uses proposed within a redevelopment scheme. As an example, whilst it is anticipated that any residential development would be car-free in accordance with London Plan Policy T6 (‘Residential parking’), this is with the exception of disabled persons car parking and therefore some provision would be required. We therefore require further detail on the car parking and how this relates to specific uses.

New station entrance

The indicative street hierarchy, access and route networks (figure 82) indicative plan and the illustrative plan with key existing and proposed character features (figure 83) both show a new station entrance at the southern end of Brewery Gardens to encourage footfall along the Rom and through the railway viaduct. It does not appear that the feasibility of this has not been properly assessed by the Council. Schrodgers on the other hand have undertaken a technical assessment of this and can confirm that the viability implications of this would be extremely high and would likely render a redevelopment scheme unviable and undeliverable. The section of the SPD relating to infrastructure projects states:

- Project: Romford Station improvements including new second entrance to station (just off South Street)
  - o Description: project to deliver improvements to Romford Station, including improved public realm, a new station entrance at Brewery Gardens, and improvements to ticketing hall. Improvements to the ticketing hall are underway, and a Schedule 7 Planning Application was submitted to the Council as Havering’s Local Planning Authority.
  - o Project status: ongoing: progressing as planned.
  - o Delivery timescales: Delivered.
  - o Estimated project cost: £3,500,000

Schrodgers would welcome further information on the estimated project cost as the feasibility work carried out by Schrodgers indicated that costs would be significantly higher than this. It

is also not clear how much the new entrance would cost in isolation from the other Romford Station improvements (i.e. how much of the £3,500,000 relates to the new entrance). It is also unclear from the site-specific guidance whether it is expected that the redevelopment of the Brewery would fund this new entrance or whether it would be expected to contribute (likely secured through a S106 legal agreement) along with other developments that are coming forward in the Town Centre that would benefit from the new entrance. If the former and it is the case that the Brewery would be expected to fund this alone, we would again direct the Council towards the PPG."

Within the Character and Townscape Theme there is discussion of contextual height and massing (section 5.6.2.2.). It is set out here that new buildings must respect the setting of Romford and its historic character and that to preserve the existing character and townscape qualities, heights of new buildings should be in-line with the diagram 53 (height strategy). The draft SPD sets out that at its centre (in and around the Romford Conservation Area) is an area suitable for 2 – 5 storeys, closely aligned with the heights of existing buildings and heritage assets. Across the rest of the town centre and its vicinity is an area suitable for 4 – 6 storeys, with buildings of compact urban form and a mid-rise townscape. In specific areas it is suitable for buildings of 4 – 8 storeys with potential for some taller elements over 8 storeys. The frequency of taller elements should not be so great as to become the predominant height datum, requiring instead the predominant height to remain at 4 – 8 storeys. Taller elements will also be required to demonstrate their appropriateness for consideration by way of (1) the location of the scheme, (2) the design quality of the scheme and (3) the community benefits from the scheme. We consider this approach to be unnecessarily restrictive to heights in the Town Centre and conflictive with delivering 'transformational change' on key sites such as The Brewery. To ensure compliance with the Local Plan, specifically Romford's location in an Opportunity Area benefitting from Crossrail, this guidance should be revised to not inadvertently restrict the scope for high density housing to be delivered, which is fundamentally necessary for Romford to deliver sufficient housing in the town centre. For example, our client has demonstrated to the Council through VuCity analysis that an alternate solution can be achieved on the Site that would retain the majority of the existing retail whilst delivering housing in a series of higher density, tall buildings that would be appropriate in principle. In any case the potential impacts of a future proposal would be assessed on its own merits as part of the Council's consideration of a planning application. This section of the SPD should be revised to remove the currently restrictive cap on building heights for The Brewery to better reflect what can be achieved on the Site. As noted previously, Schroders ultimate aim is to transform the Brewery Site into a vibrant mixed-use scheme, through the optimisation of the retail and leisure uses and the delivery of residential development. It is therefore strongly supported that the Site has been identified as a key area within the Masterplan and one of several that offer the most potential to deliver positive, transformational changes and be instrumental in the delivery of the overarching and vision for Romford. In general, our client is supportive of the vision for the Site with specific reference to the overarching principles: • "Deliver a predominantly commercial development of retail, leisure / culture and business uses that maintains the Brewery's role as a primary destination in Romford, with potential for civic uses, an expanded employment offer and / or housing at ground and on upper floors, with the Rover Rom forming the central focus of the area. New high-quality development provides attractive views in to Romford for people arriving by train in to Romford Station, and along Waterloo Road strengthens links with South Street and the High Street, safeguards and enhanced heritage assets, creates an attractive frontage to Waterloo Road and is centred around an attractive north-south open space which celebrates the River Rom". Specifically, we agree that The Brewery is a primary destination in Romford and should rightfully be acknowledged as such given its strategic importance to delivering the Masterplan vision. In terms of land uses, we agree that the redevelopment should enhance town centre activity and vitality by re-providing a retail and food & beverage focus alongside leisure uses, seeking to re-provide a similar quantum of floorspace to that which is currently on the Site. In general, the quantum of development identified for the Site is broadly agreed with, although the development principles listed by the Council could inadvertently inhibit development coming forward. " The SPD states that "it is anticipated that further analysis and design work would take place on a site-by-site basis as these (the key areas) come forward for redevelopment". This is an important caveat as it acknowledges that commercial viability will need to be assessed on each site, but this is a limitation of the SPD which goes on to set a number of commitments

for the Site to deliver. It is necessary for the SPD to more explicitly acknowledge viability and deliverability as a relevant consideration which is currently being overlooked. Firstly, whilst not being an issue with the proposed allocation, it is noted that in the existing Brewery uses it is set out that there is a public car park (Angel Way car park) which has 480 spaces. This is not correct and the total number of spaces across the Site is 1,742 spaces. This includes 616 in the surface level car park and 1,126 on the multi-storey. There are also 82 disabled parking spaces. We also raise several issues with the proposed guidance which would seriously undermine viability and the harm the extent to which development could come forward on the Site in a way which would optimise potential. Existing Retail We note that the site opportunities and objectives (figure 79) indicative plan assumes a reconfigured retailing offering fronting Exchange Street. 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It is also unclear whether the intention is for the primary school and healthcare provision to be entirely funded by the redevelopment or whether other strategically important developments in the Town Centre would also contribute to the funding and it is just that the Brewery has been identified as an ideal site. It is noted that Policy 1 of the Local Plan states that in relation to social infrastructure, development proposals that generate a primary school yield equivalent to one additional form of entry will be expected to provide adequate space on site for the provision of a school. The Council will only support proposals without this provision where it can be robustly demonstrated that existing or planned education provision can cater for the additional demand for school places. 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P2072.22, P2071.22). o Project status: funding not confirmed. o Delivery timescales: not know. o Estimated project cost: £12,000,000. Currently, the site-specific guidance is extremely light on detail and evidence base and therefore we again reiterate the role of SPDs as set by the PPG. If these other uses are a requirement of the redevelopment of the Site then they add an unnecessary financial burden without providing any justification. SUMMARY & CLOSINGS Ultimately, Schrodgers are supportive of the SPD overall and welcome the recognition that the Brewery Site as a key area offers the most potential to deliver positive, transformational changes which is instrumental to the delivery of the overarching objectives and vision for Romford is supported. However, several concerns are raised in relation to the site-specific guidance with particular reference to the purposes of the SPDs as established by the PPG. The concerns can be placed into two categories: • Key concern 1: the SPD is not ambitious enough on scope for delivering development; and • Key concern 2: equally, the SPD does not give enough consideration to the viability and the impact of this on the delivery of the sites. Our intention is to enter into further pre-application discussions with the Council to discuss the redevelopment further and to assist in guiding the formulation of the SPD. A submission has recently been made to the Council and Schrodgers look forward to progressing these discussions with the Council. In light the concerns flagged as part of this consultation, it is considered that a further round of consultation should be undertaken to ensure that key stakeholders – such as our client – are actively involved in the formulation of the SPD. This will help to ensure that development is actually

	<p>deliverable and viable, which currently is not the case. Should you have any queries or require additional information at this stage, please do not hesitate to contact"</p>	
<p>Local Resident</p>	<p>"River Rom Naturalistaion (2.2.6) This section refers to the need to naturalise the River Rom. This shows the "canalised section of the River Rom that could be renaturalised to form an attractive, linear amenity space running through the town centre." Commentary should be added that the naturalisation should only be delivered. Space and Landscape Strategy (Figure 15) Figure 15 of the Draft shows the Space and Landscape strategy. The Bridge Close site is shown in this figure as being built out, which we do not object to. However, this figure also depicts a second bridge to the south of the site. It is important to clarify that the Bridge Close proposals do not include this second bridge. While the Hybrid Application demonstrates the feasibility of accommodating a second bridge further south, it requires additional technical due diligence and consents for implementation. Moreover, it is not the intention of the Bridge Close plans to deliver this second bridge. Therefore, we seek clarification on who would be responsible for delivering the bridge and its viability. Consequently, we recommend the removal of this bridge from the Draft Consultation Document. River Rom Figure 16 5.2.2.1 Paragraph 5.2.2.1 relates to the Rom Corridor. It states "the River Rom should be deculverted and renaturalised as much as possible in and outside the town centre to improve biodiversity and enable access to the river" This is shown in Figure 16, which highlights that the Rom along Bridge Close will be naturalised. As part of the proposals, a section of the Rom will be part-naturalised, and the paragraph/figure should be revised to reflect this." "Pedestrian Crossings (Figure 28) Figure 28 of the Draft Masterplan Document identifies public realm and access improvements, building on the liveable neighbourhood proposals. Bridge Close Regeneration LLP support proposals that will facilitate improved access for all modes of transport and proposals that make walking and cycling easier and more attractive. A number of pedestrian crossings appear to be proposed leading from the from the town centre to the north via Bridge Close. We note that these relate to the Liveable Neighbourhoods Connections, however, it is important to note that these crossings have not been designed or tested in any detail and it is not clear whether these are technically deliverable from a highways perspective. Therefore, Bridge Close Regeneration LLP recommends that clarity is added to the plan to make it clear to readers that further technical due diligence is required. 5 Otherwise it could be misleading for individuals expecting to see pedestrian crossings at this location in the future. Additionally, these pedestrian crossings were not included in the Bridge Close application. Street Hierachy (Fig 31) Figure 31 identifies active travel streets traversing the site. These are noted to be primarily for pedestrians and for cyclists where appropriate. Bridge Close Regeneration LLP supports ensuring pedestrians and cyclists have priority in the redevelopment proposals for the land at Bridge Close. However, we note that the diagram does not include 'school streets' and this should cover part of the Bridge Close development area." BNG (5.4.2/5.4.2.2) Bridge Close Regeneration LLP recognise the importance of delivering sustainable and biodiverse schemes, which maximise the value of habitats wherever possible. However, it is noted that the requirement set out in the Draft Masterplan Document is that new development should be able to demonstrate a net biodiversity gain greater than 10%. This pushes beyond national policy standards. Bridge Close Regeneration LLP note that this is also contrary to the requirements of the Local Plan and London Plan. Securing in excess of 10% BNG is not a requirement of the Development Plan or national policy. The requirement could place significant constraint on development and reduce the amount of developable area. This could therefore impact the delivery of housing. We also note that where sites have an existing high ecology baseline, achieving in excess of 10% would be difficult and again would represent significant constraint to the development. Additionally, as the application was submitted prior to December 2023, Bridge Close is also not required to hit 10%. Character and Townscape Objectives (4.3.5)Objective CT4 states that the Council "seeks to redevelop or reanimate underutilised sites and buildings such as surface car parks." The draft emerging NPPF adds that "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 regarded as acceptable in principle" (122c). Therefore, Bridge Close Regeneration LLP consider that further emphasis could be added to this section on the need to redevelop under-utilised and well-connected brownfield sites. "Housing Pressures (2.3.1.5) This section of the Draft Masterplan Document refers to the residential pressures across London and the attractiveness of</p>	<p>Response welcomed. The Masterplan has undergone public engagement and consultation. The Consultation Statement details these. The Masterplan Implementation table gives further detail on infrastructure, which is an update of information provided in the Infrastructure Development Plan published with the Havering Local Plan, which will be updated along side the Havering Local Plan update.</p>

Romford as a place to live, work and visit, which has helped in part due to the delivery of the Elizabeth Line. We agree with this background context. However, consider that further emphasis is required in relation to the housing issues being faced specifically in Havering. The latest Standard Method figures identify that LB Havering has a housing requirement of 2,429 dwellings per annum. The latest Annual Monitoring Report states that Havering only delivered 1,032 dwellings in 2022. The forecast figures set out in the AMR of the Borough's future supply are shown to be significantly below the 2,429 dwelling requirement. Allied to this, the Borough can only demonstrate a 3.4 years supply of housing land supply. Equally, the latest Housing Delivery Measurement places Havering at 55% which means that a presumption in favour of development is triggered for housing proposals. We therefore consider that stronger emphasis is needed in the Draft Masterplan Document on the need to deliver housing particularly on brownfield sites that are well located, such as the land at Bridge Close. Mix and uses (4.3.6) Paragraph 4.3.6 relates to promoting a diverse mix of uses in Romford, to help strengthen its Metropolitan town centre status. Reference is made to new residential use within the town centre. The Document states that new residential development should support existing and new businesses, and that it should also have corresponding social infrastructure including schools, public spaces, health facilities and transport infrastructure delivered alongside the new residential. Bridge Close Regeneration LLP support these objectives, and the retail and commercial offering from Bridge Close, complimenting the proposed residential space will assist in strengthening Romford as a Metropolitan centre." "Area of transformation (Fig 08) Paragraph 2.4.1 and Figure 08 of the Draft Masterplan Document refers to significant potential for transformational change in Romford. The land at Bridge Close is identified as an area of "Transform". The definition of Transform is as follows: "Substantially increase developments by introducing new building types with scope to creating a new street patter / frontage". Bridge Close Regeneration LLP strongly supports the aspiration to transform parts of Romford and in particular the land at Bridge Close for housing. The site lies in a sustainable location at the edge of the town centre and within the Romford Strategic Development Area. The brownfield land is currently underutilised and there is a significant opportunity to transform this part of Romford into a new mixed-use quarter. We consider that the emphasis to transform is important to 4 assist in the delivery of much needed housing. This principle has already been established in pre-application discussions. Mix and Uses (4.3.6) Paragraph 4.3.6 relates to promoting a diverse mix. Illustrative plan with key existing and proposed character features (Fig 92) (pg. 148) This figure shows a second bridge to the south of the site. Whilst our submission shows that a second bridge could be delivered, it is important to note that this will not be secured as part of the Bridge Close Application." "Thank you for providing us with the opportunity to engage with the consultation on the Council's latest Draft Romford Masterplan Supplementary Planning Document. We write on behalf of our client, Bridge Close Regeneration LLP, who have an interest in the land at Bridge Close, Romford These representations provide observations on the Draft Masterplan Document in the context of the level of housing in the London Borough of Havering and in relation to our client's interest in the land at Bridge Close, Romford. We also provide comments in relation to the Page Calnan Building on South Street. This site has been identified and agreed as the relocation site for the Havering Islamic Cultural Centre (HICC). As such, our representations seek to ensure that it is protected as the relocation site for the HICC. This Bridge Close site is located within an area of transition and regeneration as part of the emerging proposals for the Romford Town Centre Masterplan. We fully support the aspirations of the Council to designate the site as an area for transformative change. A hybrid planning application was lodged in November 2023, which seeks permission for a new urban quarter within Romford Town Centre (Ref. P1765.23). This will deliver a significant quantum of new homes, jobs and community facilities. Below we set out a brief summary of the context to the site and the hybrid planning application before turning to specific comments on the consultation document. Context The site measures approximately 3.68 hectares in total and is predominantly rectangular in shape. The site is currently underutilised brownfield land, comprises a range of industrial and commercial buildings (Use Classes E(g), B2, B8, F1/F2 and Sui Generis) extending to between one and three commercial storeys in height together with residential properties (Class C3) fronting onto both Waterloo Road and Oldchurch Road. The site has an excellent Public Transport Accessibility Level (PTAL) of between 5 and 6a. Additionally, the site does not lie within a Conservation Area, is not designated as a Site of Importance to Nature Conservation and there are

no statutory listed buildings on the site or within the immediate surrounding area. Part of the site is located within Flood Zone 2, associated with the adjacent River Rom. The remainder and majority of the site is designated as Flood Zone 1. In November 2023, an application (Ref. P1765.23) proposing the following was submitted: "Hybrid planning application for 1) Full Planning Permission for the erection of three buildings comprising 383 residential units (Class C3); 1,920 sqm (GEA) of commercial floorspace (Class E use) and a three form entry primary school and nursery (Class F1(a)); with the erection of a new pedestrian/cycle bridge; new vehicular and pedestrian arrangements; a new public square and civic square; new public realm works; and associated infrastructure and works incidental to the proposed development. 2) Outline Planning Permission with access to be considered for up to 687 residential dwellings (Class C3); community floorspace of up to 2,768 sqm (GEA) comprising a health centre (Class E(e)) and a community centre (Class F1 / F2); up to 4,045 sqm (GEA) commercial floorspace (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" This application is currently pending. However, resubmission of additional plans and information to respond to queries raised during the determination period of the application is due to take place early 2025. Nonetheless, the proposal follows the principles for the site allocation (ROMSSA2) in the Romford Area Action Plan (2008), alongside those in the Romford Town Centre Development Framework (RDF) (2015). As part of this redevelopment, the Havering Islamic Cultural Centre (HICC) (Class F) is proposed to be relocated to the site of the Page Calnan Building. The Havering Development Plan requires re-provision of social infrastructure facilities in circumstances where there is a defined need. As the HICC has a lawful permission for its operations from within the site the Applicant has carefully considered how to address the requirement for re-provision. The site has been agreed by the HICC as an acceptable alternative site that will meet its needs. We note that some of the principles previously established in the site allocation and application discussions have not been accounted for in the recent Draft Masterplan. We therefore set out comments on the Draft Consultation Document below. Existing Rom Valley Physical Context (Fig 95) (pg. 150) This figure illustrates the existing Page Calnan Building within the Rom Valley Guidance Area. This newly designated area outlines design principles to guide future development. It should be noted that the Page Calnan Building has been identified and agreed as the relocation site for the Havering Islamic Cultural Centre (HICC). The Draft Masterplan Document accurately notes that the building is locally listed (Ref. SAL14) and indicates that it should be retained. However, it is crucial to recognise that the building is not statutorily listed and does not have the same level of protection as designated heritage assets. Consequently, the masterplan document should not assert the building's retention as an absolute requirement. 6 Furthermore, the local listing highlights the principal façade as the main architectural interest, specifically its Art Deco style and its representation as a typical builder's showroom. The remainder of the building exhibits limited architectural or historical significance. Therefore, as plans for this site evolve, it may be feasible to develop a scheme that retains only the existing façade. Indicative ground floor uses strategy (Fig 97) (pg. 153) Figure 97 shows an indicative ground floor use plan. This figure shows the Page Calnan Building retained and with an illustrative masterplan layout to the rear of it. In addition, the large surface car parking to the rear of the existing building has also gone in favour of a new massing. The key also suggests that the plot should include residential use above ground floor level. As mentioned, the building has now been identified and agreed as the new site for the HICC. The HICC taking occupation of this site will facilitate the redevelopment of the Bridge Close proposals. Social infrastructure will not be lost as a result of the redevelopment of the Bridge Close site which will accord with planning policy. We understand an initial pre-application discussion with Development Management Officers have taken place. The Draft Masterplan Document needs to be adjusted to make it clear that this is the relocation site for the HICC. The Draft Document also currently shows the site as accommodating solely residential uses. However, given that the site is likely to be occupied by the HICC, it is prudent to show some flexibility over the use of this site as it may not be developed for residential purposes. Therefore, this wording needs to be adjusted to reflect that the site may be developed for social infrastructure. The indicative ground floor strategy also shows



massing across the existing car park area to the rear of the site. It is important to note that the majority of car parking at this site will be retained by the HICC for use by its members. Therefore, it is inaccurate to depict this massing option as it is unlikely to be realised in this manner. Indicative public open space provision and locations (Fig 98) (pg. 154) This figure illustrates a potential new bridge across the River Rom from the rear of the Page Calnan site. While the principle of establishing a new connection is supported, this bridge has neither been tested nor designed. Therefore, we seek further clarity on who is expected to deliver the bridge and whether it is viable at the location. Additionally, we question the appropriateness of locating this bridge at the site which is to be safeguarded for the HICC, given the likely increase in car parking movements to support its users. Therefore, it is likely that a bridge at this location is unlikely to be feasible. There are other connections and crossings across the Rom that are better suited. Indicative Street Hierarchy, Access (Fig 99) (pg. 155) Similar to Figure 98, Figure 99 depicts a footbridge to the rear of the Page Calnan Building. We reiterate our concerns regarding the appropriateness and necessity of an additional bridge at this location. There does not appear to be a clear desire line or essential connection justifying the bridge's delivery here. Additionally, an active travel street is shown traversing the Page Calnan site. Bridge Close Regeneration LLP considers the location of this active travel street to be inappropriate, given the car parking requirements needed to support the HICC's occupancy. Illustrative massing strategy (Fig 101) (pg. 157) This figure presents a massing option for the Page Calnan Building. We question whether this massing option has been thoroughly tested through the planning process. Additionally, a footbridge is depicted to the rear of the building. It is unclear whether this bridge is necessary or technically feasible at this location. There are also concerns regarding the bridge's viability and the responsibility for its delivery. Therefore, both the massing option and the footbridge should either be removed or clearly labelled as indicative." "Existing context 2.2.5 This section of the Document refers to the existing heights across the town centre. The draft details state that the town centre is predominately low-rise, with a handful of higher rise buildings citing only Mercury Gardens and Waterloo Estate as these taller elements. We do not agree that the town centre is predominately low rise. This reference is more suitable to the context outside of the Strategic Development Area where the context is clearly between 2-3 storeys. There are a number of instances where taller buildings have been approved which have changed the context of the town centre. As such, we consider that this section should identify committed developments and those currently in the planning system. This section should address the following applications which are either committed or within the planning system: • Angel Way – Permission for 3 to 15 storeys (currently in construction); • 20 – 55 North Street – Permission for 4 to 16 storeys (currently in construction); • 3 • Rom Valley Way – Permission for 2 to 12 storeys; • Jubilee Park – 5 to 8 storeys (Built) • Leyland Court – 8 storeys (Built) • Waterloo Estate – Permission for 3 to 16 storeys (demolition and clearing of site undertaken); • Seedbed Centre – Permission for buildings up to 12 storeys; • Bridge Close – under consideration for buildings up to 14 storeys • Como Street – at pre-application stage for buildings up to 9 storeys. In light of the above, it is evident that the context in Romford is changing to incorporate taller buildings, including at Bridge Close. This should be made clear in the existing and emerging context sections of the Draft Masterplan Document. Social Infrastructure (5.7.2.6) (pg. 106) A new 3FE primary school is proposed as part of the Bridge Close application, detailed in section 5.7.2.6 of the consultation document. Table 11 of the Draft Document states: "3FE to be provided as part of a new school in the proposed Bridge Close development, due to open school year 2028-29." Bridge Close Regeneration LLP requests that any reference to the timing of the school's delivery be omitted from the table. Given that the Hybrid Application has yet to be approved and various consents are required from the Department for Education, we believe it is inappropriate to specify a delivery timeframe for the school at this stage. Romford Ambulance Deployment Centre (Table 34. Infrastructure. The text within Table 34. "Infrastructure projects" in relation to the Romford Ambulance Deployment Centre should be amended as follows: "Project to deliver a new ambulance station in Romford as part of the Bridge Close regeneration scheme." Due to the ongoing regeneration programme at Bridge Close there is a need to reprovide the existing ambulance station within Romford. Havering Council is working with the London Ambulance Service NHS Trust (LAS), NHS England (London Region), North East London Integrated Care Board (NEL ICB) and Greater London Authority (GLA) to plan the delivery relocation of the new existing ambulance station

	<p>with an equivalent capable of serving the needs of the residents of Romford, Havering and North East London.” In addition to the above, the estimated project cost is currently not known and therefore the text which currently states “c. £15,000,000 - £20,000,000” should be amended accordingly.”</p>	
<p>Cllr Joshua Chapman</p>	<p>I believe more time is required to create a master plan worthy of our town centre. The previous administration rejected some of the early iterations prepared by officers because of its poor quality and the impact it would have had on Romford. I don't believe much has changed at all since that time from my perspective having seen some of those early iterations. Perhaps the breadth of the plan has changed (number of sites etc) but it still uses the same broad-brush approach and lacks specificity where it matters (notably the master plan lacks nuance around building heights, such as how individual sites can be shaped through variation of height and character which in my view should be set out in some detail for every major site, instead of a broad brush '4-8 storeys' or other height variation. Therefore, this masterplan does not give clarity on how to shape and guide development - the very purpose of this document). To take a more detailed and nuanced approach would be sensible, and formed the basis of my comments in 2021 for how we could improve this masterplan. This was the council's chance to place-shape site by site, being very specific with what we'd happily see on those sites, and to influence Romford's future with 'material weight' in the planning process, but the plan has not managed to do this. Oddly, the plan is overly specific in certain areas (liberty roof example discussed with councillors below), but really misses the nuance where it matters. The council has let the time pass and the masterplan looks almost the same as the early iterations, and I'm very sad to see that. Therefore, this masterplan will not realise the vision set out at the start of the master plan as far as I'm concerned. The Liberty's roof removal was something discussed at the ward councillor meeting and should not form part of the master plan. At our councillors' meeting, consultants set out that this choice is only a 'guide' which site owners don't have to follow. For me, this suggests a fundamental misunderstanding of what a masterplan is. I don't know if that terminology was being colloquialised for councillors, but this is a formal supplementary planning document to which planning officers must give material weight, and we should not be making poor choices within the masterplan to 'guide' developers - it's a bit of a fantasy. Unfortunately, we've not really been kept in the loop over the last two and a half years and could have helped at the drawing board. I'm more than happy to commit the time to start this master plan again - working with officers to get better results for Romford. In all honesty and with the greatest of respect for the work that has gone into it, I don't think this plan will succeed as set out.</p>	<p>Noted the comments made on the Masterplan. The Masterplan acknowledges that current parking is being lost and the Masterplan proposed a strategic approach to providing an equitable distribution of safe, quality parking. The Masterplan is not the level of detail to prescribe the aesthetic, design codes can address this level of detail for use across the borough. The Masterplan does not propose to reduce the accessible space within the Market place for the Market, rather advocating improvement. The Masterplan advocates for a north/south transport link but is not reliant upon it. Sustainability is a key consideration across the Masterplan themes and implementation. For clarifications, the character and implementation for the Liberty are detailed within sections</p>

		6.7.3.4 Character and Townscape and 6.7.3.5 Implementation.
Local Resident	<p>"Preservation of green surrounding areas are vital for the population of Romford, which is growing rapidly. I am unclear what you mean by 'pocket parks' in the plan but something better than the flowerpots the BID call pocket parks in central areas are definitely required, please. If you are going for large pots then some of the larger round metal plant containers would be better - plant them with something prickly to deter rubbish dumpers! River Rom. It's good to see the commitment to establish the river as an ecological linear park. pedestrians and cyclists have priority in the redevelopment proposals" "I would like to comment on the importance of the rail station in any plan and while the pictures of a new exterior layout at the front of the station look lovely it's not very practical. If there is a master plan, can we not do away with or move the buildings between the flats in Atlanta B'vd and the bus stops? There could then be a much larger, better area for buses and also space for a people/car pickup point. If you've ever walked round the back of the bus stands you will realise what a very hostile spot this is. A much better 'divider' - with trees - could then be placed in front of the flats to separate them from the travel hubbub. Cycle lanes, pedestrian/cycle mixed areas etc also need careful consideration, given that most cyclists do not use the existing ones - preferring to race along the pavements endangering pedestrians and not using their bells!! " Historic buildings. These need to be retained – too many have already been demolished. The pic of the marketplace looks lovely but not at all like a market as it shows only the small section near the church with a few stalls. In fact none of the pics I could see in the plan document show the market realistically. This is important if we still want it to be a busy trading area and not just a pretty place with seats and a few trees (altho' I am in favour of the trees in the market to help keep the place cooler). The picture makes it look as if the market was being much reduced. I don't think you need a special 'entertainment' area at the end of the market – just use the space when you need it, as now. My comments on Romford Masterplan are set out below. What a pity there were no bullet points with the main issues to grasp people's attention. I am generally against the proliferation of highrise blocks of flats in Romford so am in favour of the vision of lower 'highrise' but given what's already been built I have serious doubts that this will get through. I would love to see more sympathetic shop signs in place of the 'brassy' allsorts variety we currently have.</p>	Comments noted. Please refer to section 3.3 of the consultation statement for proposed changes on these topics.
Environment Agency	<p>Thank you for consulting us on the draft Romford Masterplan Supplementary Planning Document (SPD). We are pleased to see and support the aims of the Masterplan to open up the River Rom, remove culverts and naturalise its course to provide a continuous ecological corridor and enhanced hydraulic capacity. Following our review, we have provided detailed comments below in line with our remit. Flood Risk We support and pursue opportunities to restore culverted watercourses to open channel. We are pleased to see that where there are proposals to de-culvert, in depth modelling will be carried out to ensure no increase in flood risk. However, we note that outdated climate change allowances have been referenced in the masterplan. Please be aware that from 2022, all developments in Flood Zone 2 and 3 assess and design to the Central allowance only, apart from essential infrastructure, which should assess and design to the Higher Central allowance. Details of the new central allowance can be found here: Flood risk assessments: climate change allowances - GOV.UK. This will need to be updated in the masterplan moving forward. We are pleased to see that section 5.2.2.1 (Green Strategy) of the masterplan outlines that buildings should be set back a minimum of 8 metres from the top of the riverbank to achieve a wide naturalised riparian corridor and to provide maintenance access to the river and any fluvial flood defences. If this is not possible, applicants must provide adequate technical justification as to why the buffer zone cannot be provided. Any access points to the River Rom must be maintained. Any works on or within 8 metres of a main river/flood defence structure or culvert (including any buried elements) will require a permit under the Environmental Permitting (England and Wales) Regulations 2016. Further guidance can be found 2 on our website at: <a href="https://www.gov.uk/guidance/flood-risk-activities-environmental-permits">https://www.gov.uk/guidance/flood-risk-activities-environmental-permits</a>. "Biodiversity and renaturalisation We are pleased to see that section 5.2.2.1 part 3 (Rom Corridor) states that the River Rom should be deculverted and renaturalised as much as possible in and outside the town centre to improve biodiversity. This is outlined as being in line with 'Environment Agency's national</p>	Response welcomed. Clarifications on flood risk assessments and climate change; deculverting; reference to the River Rom and water quality have been made. Biodiversity Net Gain requirement has also been clarified and is in line with the National Planning Policy Framework. We look forward to working with the Environment Agency as the

<p>policy'. Please can further clarification be provided as to which policy this is referring. Section 5.4.2.1. (opening up the River Rom) highlights that where deculverting of sections of the Black's Brook is not possible, 'spatial provision will be made for future deculverting and renaturalising'. We are pleased to see that spatial provision will be provided however please can further clarification be provided on the metrics of this i.e. how much space will be provided. We assume that spatial provision will also be provided along the River Rom where deculverting is found to not be feasible at certain locations. It is also stated that 'opportunities for making use for the increased floodplain capacity to reduce flood risk will be explored, and the necessary flow controls will be introduced in the river channel.' Please note that we would not be supportive of any additional hard standing flow controls to the channel, for example weirs or any similar structures. Any proposed scour protection and erosion control should be soft engineered where possible, to prevent the potential degradation of ecological habitats and affecting the stability of these infrastructures. Restoring natural processes in the watercourses is key to renaturalisation. The removal of artificial elements in and adjacent to the watercourse that constrain natural functioning provides a huge benefit within an urban environment and should be prioritised. Constraints include the concrete riverbed, concrete/artificial banks, culverts and weirs. We would like to highlight that the Thames river basin management plan requires the restoration and enhancement of water bodies to prevent deterioration and promote recovery of water bodies.</p> <p>Biodiversity Net Gain (BNG) Biodiversity net gain has been referenced in section 5.4.2.1 (biodiversity net gain) of the Masterplan. We are pleased to see that the Masterplan requires all new development to be able to demonstrate a net biodiversity gain of greater than 10%, pushing beyond National Planning Policy minimum of 10%, as calculated using the statutory biodiversity metric tool. Please be aware that the Watercourse Unit Module within the Statutory Biodiversity Metric is of key importance in determining whether BNG has been met for watercourses. Guidance on undertaking metric calculations is available in The Statutory Biodiversity Metric User Guide (Feb 2024) and all information regarding BNG can be found via <a href="https://www.gov.uk/guidance/understanding-biodiversity-net-gain">https://www.gov.uk/guidance/understanding-biodiversity-net-gain</a> or in the planning practice guidance. Water Framework Directive All developments in the Romford area must therefore not deteriorate any of the above water bodies or their associated elements. As the ecological statuses of water courses are affected by the water entering a water course from its wider catchment (e.g. via surface water run-off), new development runs the risk of deteriorating the supporting elements of the above mentioned water bodies. We are pleased to see that objective SL9 in section 4.3.1 (space &amp; landscape) highlights the need to contribute to achieving the Good Ecological Status of the Water Framework Directive (WFD) for the River Rom in line with the relevant actions and measures set out in the Thames River Basin Management Plan. Section 5.4.2.1 (opening up the River Rom) states that 'The water quality of the Rom in the town centre is described by the Environment Agency overall as 'Moderate' with 'Good' quality chemical status.' We have concerns surrounding this wording for the following reasons: • The overall status of 'moderate' is not specifically representing the water quality of the river as it combines the status of water quality and ecology. • The 'good' chemical status of the Rom is from the 2016 classification and therefore outdated. The data from 2019 suggests the chemical status is a fail. The data should be updated inline with the most recent status or reference should be made to specify which data has been taken into account. We would therefore recommend the following amendments. 'The overall waterbody status of the Rom in the town centre, including water quality and ecology elements, is described by the Environment Agency as 'Moderate. • (EITHER) with 'Good' quality chemical status under the 2016 classification. • (OR) with a failed chemical status under the 2019 classification The WFD waterbodies in the Romford Area are as below: Rom (Bourne Brook to Ravensbourne) " Sustainable Drainage Systems (SuDS) We are pleased to see inclusion of reference to SuDS within the Romford Masterplan. The use of appropriate SuDS is essential if developments are to mitigate their contribution to urban surface runoff in the Romford Area. The London Plan asserts that SuDS should be used in all developments in order to reduce surface run-off (Policy SI 13, page 385-386). The London Plan also stipulates that SuDS should be installed in public spaces (Policy D8 I, page 135; Policy G5 A, page 322). Water Efficiency We are pleased to see section 5.4.2.1 (reducing water footprint) has outlined that water use within residential building will be reduced to a maximum of 110 litres / person / day in line with Policy SI5 of the London Plan. Additionally, that Non-residential buildings will be designed to achieve</p>	<p>Masterplan is implemented.</p>
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	<p>BREEAM Excellent rating for water efficiency We would recommend further emphasis on the provision of water efficiency improving retrofits including SuDS that harness rainwater as a water resource as outlined in the London Plan policy SI 13 B (page 385)." Water Efficiency We are pleased to see section 5.4.2.1 (reducing water footprint) has outlined that water use within residential building will be reduced to a maximum of 110 litres / person / day in line with Policy SI5 of the London Plan. Additionally, that Non-residential buildings will be designed to achieve BREEAM Excellent rating for water efficiency We would recommend further emphasis on the provision of water efficiency improving retrofits including SuDS that harness rainwater as a water resource as outlined in the London Plan policy SI 13 B (page 385).</p>	
<p>Historic England</p>	<p>"Thank you for your recent email inviting comments on the draft Romford masterplan. As the Government's statutory adviser on the historic environment, Historic England is keen to ensure that the protection and enhancement of the historic environment is fully taken into account at all stages of the planning process. Our comments are made in the context of the principles relating to the historic environment and local plans within the National Planning Policy Framework (NPPF) and the accompanying Planning Practice Guide (PPG). Historic England broadly supports the contents of the masterplan and considers that it provides for a coherent vision for the future development of the area. In particular, we welcome the focus on the historic core of Romford around the Market Place and the character of the conservation area within the draft Masterplan, for example as set out in section 5.6.1. We also strongly support the proposal to remove car parking from the Market Place. Nevertheless, we consider that the document could go further to ensure appropriate consideration of the historic environment as part of proposals that are likely to come forward in the area after its adoption. As indicated, we welcome the various references to the importance of the historic environment to townscape character of both the conservation area and the cluster of listed buildings (including the Grade II* St Edward the Confessor church) towards the southern end of the Market Place. However, we consider that this importance is not necessarily reflected in the vision, themes and guidance set out in the consultation draft. We consider that the importance of conserving heritage significance could be clearer as to how development proposals should approach the challenge of integrating successfully with the existing built context. London Plan Policy D3 requires a design-led approach to optimising site capacity that responds to the existing character of a place, respecting and enhancing heritage assets. Policy HC1b also explicitly requires that development plans and policies demonstrate a clear understanding of the historic environment and its significance (including any contribution by setting) and use that to inform a 'clear vision' that 'embeds the role of heritage in placemaking'. To this end, we would suggest that further references (particularly to heritage significance to reflect the terminology of the NPPF) could be made at sections 4.1, 4.3.5 and 6.2. We note there is no reference within the document to the conservation area's presence on the Heritage at Risk register. We would strongly recommend including text setting out the aspiration to ensure that as the Masterplan is delivered it addresses this issue and contributes to the conservation area's removal from the register. We also note there is no reference to archaeology within the document. A review of archaeological priority areas (APAs) within Havering has recently been completed. The Romford and Roman Settlement APA covers a substantial element of the masterplan area, and will be a consideration for some development proposals in the future. APAs should be referenced in the document. Section 5.6.2.2 contains detail on potential building heights across the masterplan area. We note that tall buildings are defined as 18 metres and above within the draft. As the Havering Character Study referred to on page 94 does not appear to be publicly available as yet, we would be keen to understand on what basis this definition has been arrived at and how the colour coded height areas have been determined. That being said, we welcome the requirement for lower heights in the immediate surroundings of the conservation area. We consider that further detail and advice regarding appropriate heights should be included in the site guidance sections for those adjacent to the Market Place, for example Mercury. " Finally, we note the suggestion that the conservation area should be extended along South Street to encompass whole buildings fronting the street rather than simply their facades as at present. We note the boundary has included only frontages since its initial designation, and would support the suggestion as set out. We would however also suggest that there remains logic to similarly extending the boundary to include whole buildings along the Market Place, High Street and North Street – as recommended in the conservation</p>	<p>Comments welcomed. A greater emphasis on historic assets has been placed within the Masterplan, greater references to the Conservation Area have been made at sections 4.1, 4.3.5 and 6.2. Archaeological Priority Areas are now specifically referenced, as is the Romford Conservation Area being on the At Risk Register in order to highlight the issue and to contribute to the removal from the register as the Masterplan is delivered. The Character Study has now been published.</p>

	<p>area appraisal and management proposals. We would encourage the Council to ensure that your own conservation staff are involved in the preparation of this document to help ensure that heritage issues are adequately addressed. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.</p>	
National Highways	<p>Thank you for your email of 1 October 2024 inviting National Highways to comment on the Romford Masterplan consultation and indicating that a response was required by 11 November 2024. National Highways was appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. The draft Romford Masterplan Supplementary Planning Document is a strategic plan aimed at guiding future development within the area. The Masterplan aims to improve Romford's unique character and history, creating a vibrant, mixed-use town centre. Junctions 28 and 29 of the M25 are both approximately 6 miles to the east and northeast of Romford town centre making them the closest SRN junctions to the masterplan area. Due to the distance from the SRN and the existing urban and populated area nature of Romford town centre, National Highways are satisfied that the consultation above will not materially affect the safety, reliability and / or operation of the SRN (based on the tests set out in DfT Circular 01/2022 and DLUHC NPPF 2023 [particularly paras 110 to 113]).</p>	Noted
Planning Consultants on behalf of the owners of the Liberty	<p>On behalf of our client, Redical Limited (in its capacity as the asset manager of the Liberty Shopping Centre) and Redical Holdings AG (in its capacity as an investor in and senior real estate advisor to Seleth LP, which owns the Liberty Shopping Centre and adjacent land parcels around it), we are writing in response to your recent invitation for comments on the London Borough of Havering's Romford Town Centre Draft Masterplan ("Draft Masterplan"). Redical welcome the opportunity to engage with the LB Havering in producing the Draft Masterplan and acknowledge its role in shaping and guiding future development in the Town Centre over the next 10–15-year period. The Draft Masterplan acts as a catalyst to stimulate development and seeks to deliver much needed new homes and jobs to this area of the borough. As landowners of The Liberty Shopping Centre, Redical are particularly interested in the redevelopment of the centre of Romford to re-energise and rejuvenate this area of the borough in line with its Opportunity Area designation. Redical recognise the importance of The Liberty Shopping Centre in contributing to the aspirations of the Draft Masterplan in delivering new homes and modern, flexible commercial floorspace to strengthen and regenerate the core of Romford Town Centre. In summary, Redical supports many of the principles and aims outlined in the Draft Masterplan, particularly the intention to "accommodate significant levels of housing and economic growth in the coming years" and the ambition to "support a vibrant mix of comparison shopping, employment, leisure, night-time economy, and housing" (Paragraph 1.1.1). Further details pertaining to Redical's views on the Draft Masterplan and information on where we are seeking amendments to, or further clarification on the guidance documents, is noted in Section B below. It is critical to the success of the Masterplan and the delivery of the scale of development required to rejuvenate and revitalise Romford Town Centre to optimise key sites and in particular the Liberty Shopping Centre which is at the heart of Romford. The Liberty Shopping Centre is identified as the "catalyst for transformational change" and the Masterplan should fully support and promote its sustainable redevelopment. This will include the retention of the core mall area, partial demolition of 2 other areas of the shopping centre, creation of pedestrian through-routes, additional height as appropriate in a town centre and Opportunity Area and a much-enhanced public realm. Increased density on this well-located brownfield site will attract new residents to the Town Centre, create new jobs and generate footfall and increased revenue for new and existing businesses in the area. a. Redical Background Redical are the owners and operators of The Liberty Shopping Centre and own and operate a number of key urban destinations in the UK including Victoria in Leeds and Clayton Square in Liverpool. Redical's vision is to reinvigorate The Liberty Shopping Centre and re-establish its role as a destination, through improving the retail offer, enhancing the physical environment and space around the Shopping Centre and</p>	Support noted. The Local Planning Authority welcomes the opportunity to engage in pre application discussions regarding the development opportunities on this key site.

reimagining the customer experience. Throughout this representation document, we refer to the “redevelopment of the Shopping Centre”, which encompasses our vision and development objectives for the area we own within and around the core malls of the Liberty Shopping Centre. This vision is described and further explained in Section 6 below, under the heading “Redical’s Vision for the Liberty Shopping Centre”. b.

Romford Town Centre Draft Masterplan Representations As previously stated, Redical are supportive of many of the principles outlined within the Draft Masterplan and they are in many respects aligned with Redical’s vision for the redevelopment of the Liberty Shopping Centre. However, Redical would like to make representations directly responding to several points relating to the vision and aims of the document (in the order as presented in the Draft Masterplan).

Section 3: Engagement Redical support the high levels of engagement that have taken place to produce this Draft Masterplan and are encouraged by the findings of Section 3 which state that the overall sentiment about the Draft Masterplan was positive with 73% of respondents either strongly or somewhat agreeing with the established principles. Redical also note the progress between the 2019 and 2024 “Key Supported Moves” with continued support for a high-quality public realm to enhance the attractiveness of the town centre. The priorities for the Market Place have evolved. Improvements to the Market Place and supporting a rejuvenated market have shifted with the Market Place now considered a “key transformation area” for Romford – thus highlighting the importance of this area of the Town Centre in accommodating growth, whilst respecting the local character of the area and retaining key local landmarks which are important to existing residents. People expect change and something new. The ambitions of the Draft Masterplan, together with Redical’s aspirations for The Liberty Shopping Centre have the potential to attract a greater variety of uses to the area including retail, restaurants, cafes, leisure and cultural uses which are considered key components of the Draft Masterplan. These uses will enhance and support the existing amenities and social infrastructure which are essential in meeting the needs of the local community and providing facilities and services for those who live in and travel to Romford for work, leisure and social purposes.

Section 4 & 5: Vision for Change and Draft Masterplan Themes Section 4 sets out the vision for changes and includes the overarching objectives of the Draft Masterplan. Section 5 sets out the strategies which are designed to deliver the objectives and the Vision. We consider the objectives and strategies under their respective headings below.

"Section 4.2.1 - Draft Masterplan Moves / Illustrative Masterplan: The Draft Masterplan includes a number of key spatial moves which establish the physical structure and interventions required to achieve the long-term vision for Romford Town Centre. Those that are most relevant to the redevelopment of the Liberty Shopping Centre are set out below. Celebrating Romford Market Whilst the redevelopment of the Liberty Shopping Centre would be distinct from the Market Place, it is imperative to the success of the Town Centre that both shopping areas can co-exist, with a diverse retail offer to meet the equally diverse needs of Romford’s residents and those who use the services and facilities. Proposals for the Shopping Centre will include increased permeability into and through the site which will include improved routes to the Market Place. Reinstating the historic urban grain Within the Liberty Centre, there is no 'historic urban grain' to 'reinstate' as prior to development of Liberty Centre, this site was only ever open backland behind the Market Place. The supporting text of this key move focuses on enhancing permeability and active frontages for any elements of the townscape which are to be redeveloped. As such, the title of this key move as 'reinstating the historic urban grain' is confusing in relation to the actual aims of this key move and the practicality of reinstatement where no historic urban grain exists. Wider green links The Draft Masterplan also includes intentions to introduce green links to act as walking routes and cycling corridors. The future redevelopment proposals for the Liberty Shopping Centre will seek to provide an enhanced public realm, including landscaping and greening thereby contributing towards the Draft Masterplan’s objective to connect public green spaces and parks. The Vision is underpinned by 7 key themes each with a number of objectives. We set out each of the themes and objectives which would be most relevant to the future redevelopment of the Liberty Shopping Centre below.

Space and Landscape The overarching aim is to promote a wide range of public spaces including parks with a particular emphasis on the River Rom together with the creation and enhancement of green and blue networks, new street tree planting and pocket parks to ensure a greener Romford. The Draft Masterplan identifies 9 objectives including:

- SL1. Link the town centre with existing nearby green spaces in order to improve habitat linkages and

increase urban greening to encourage walking and cycling. • SL2. Create new green spaces and enhance existing spaces to support a family friendly town centre and larger resident population and to help people adopt healthy lifestyles and to better connect them with nature. • SL5. Transform the market in to the major public civic space in the town centre, that is able to host a range of events and activities. • SL6. Improve town centre wayfinding through routes and spaces with clear hierarchies, including across the ring road and routes to the station. 4 It is envisaged that the redevelopment of the Liberty Shopping Centre would improve and enhance linkages within the town centre and encourage movement into and through the shopping centre. The creation of new public realm and open space, together with providing an attractive route through to Market Place will align with the Draft Masterplan's aspiration to improve wayfinding and help in transforming the market into a major public civic space. These improvements will also encourage walking and cycling into and through the town centre" Movement and Connectivity The Draft Masterplan seeks to increase connectivity and encourage healthier lifestyles though creating a better public realm, reconfiguring streets and providing safe and inclusive spaces to walk cycle and dwell. There are 8 objectives identified in the Draft Masterplan as part of this theme. The following objectives are those which are considered most relevant to the redevelopment of the Liberty Shopping Centre. • MC2. Improve connections between the town centre and existing schools, health and community facilities and open spaces outside of the ring road and encourage walking and cycling by making routes family friendly, safe and enjoyable. • MC3. Improve the arrival gateways into Romford by rail, bus, road, on foot and by bike. • MC5. Roll out a town centre public car parking strategy which optimises the number of spaces and creates attractive car parking areas that people feel safe to use. • MC8. Promote active travel as an attractive alternative to vehicular travel. These objectives are wide-reaching, far beyond the Liberty Centre Shopping Centre however, the future redevelopment of the site will contribute to meeting a number of the objectives identified in the Draft Masterplan relating to movement and connectivity. Improving connections and legibility within and around the site is key to the success of the Liberty Centre and the wider Romford Town Centre. A redevelopment of the Shopping Centre will increase footfall in the town centre which is well-served by public transport and has existing car parking to facilitate those coming from beyond the town centre and those who are less able to utilise public transport modes. Existing car parking would be refreshed as part of any redevelopment of the Shopping Centre to ensure it is safe and convenient to use. Notwithstanding that, a redevelopment of the Shopping Centre would support sustainable transport modes such as walking and cycling through the creation of a more attractive public realm and provision of cycle parking. The existing highway network prioritises road traffic over sustainable travel modes. The Draft Masterplan seeks to adjust the priorities of travel, and place pedestrians and cyclists before other modes, which could encourage more sustainable travel trips to the town centre and reduce traffic. The redevelopment of the Shopping Centre will be instrumental in creating gateways into and delivering permeable active travel routes through the Shopping Centre. It also has the potential to improve a gateway to The Liberty Shopping Centre and enhance the pedestrian and cycle environment along Mercury Gardens. The strategy to transform roundabouts and providing at-grade pedestrian and cycling facilities will provide a significant improvement to active travel routes, especially for vulnerable or mobility impaired people. Focussing on the St Edwards Way/Mercury Gardens junction, at-grade crossings will enhance this gateway into the market and future proposals to redevelopment the Shopping Centre. The Draft Masterplan seeks to increase the number of at-grade crossing points around the ring-road away from junctions, including along Mercury Gardens, enhancing the permeability of the town centre and links between The Liberty Shopping Centre and The Mercury Shopping Centre. The proposed street hierarchy suggests a finer grain approach to the layout of the streets. There is a potential that this could lead to large servicing vehicles encroaching and loading in pedestrian spaces. Consideration will have to be given to the impact of large vehicle swept paths upon the street space. Sustainability The Draft Masterplan seeks to achieve environmental and wellbeing benefits with the three strands of sustainability: environmental, social and economic, running through the Draft Masterplan as an undercurrent or 'golden thread'. This theme encompasses 8 objectives which focus on using sustainable energy solutions to reduce carbon emissions, incorporate the principles of the circular economy, improve active travel as well as blue and green infrastructure. The redevelopment of the Shopping Centre will integrate key principles of sustainability into its design and



construction. A fundamental component of our future redevelopment vision will include the retention and refurbishment of a large part of the existing Liberty Shopping Centre which will provide a significant contribution towards Romford's aim to be a Zero Carbon Town by 2030 – one of the objectives of the Draft Masterplan. Indeed, all the objectives within this theme are relevant to the redevelopment of the Shopping Centre. • S1. Transition Romford to a Zero Carbon Town by 2030 and use the Council's Carbon Offset Fund to achieve it. • S2. Encourage zero carbon development through energy efficient design that considers both operational and embodied carbon. • S3. Develop a strategy for an integrated heat and power network linking wind and solar energy generation, battery storage, ambient heat networks and waste heat sources, with consideration to future proofing, climate change and greater use of electric vehicles. • S4. Create / consider the establishment of a local energy company, such as a Community Interest Company, to supply affordable and reliable energy heat and power to the residents of Romford. • S5. Adopt the principles of the circular economy for all development, incentivising building adaptation and reuse. Incorporating strategies to ensure zero waste to landfill through reuse and recycling of building elements and designing for longevity, adaptability, flexibility and disassembly, taking account of building layers and their lifecycle. • S6: Improving blue and green infrastructure to mitigate and reduce the risk of flooding on the River Rom catchment as well as increasing biodiversity to provide environmental resilience to the effects of climate change • S7: Promote active travel through improved public transportation and the creation of walking and cycling routes. • S8: Promote local, shared food growing opportunities including small allotments, communal gardens and growing spaces within developments. Redical are particularly keen to retain a large area of the existing Shopping Centre as part of the wider future proposals for redevelopment. This would help to meet a number of the objectives set out in the Draft Masterplan relating to zero carbon, adopting circular economy principles including reuse and recycling of materials and reducing waste to landfill. Other sustainable measures would also be proposed as part of a future redevelopment of the Shopping Centre such as including green and blue infrastructure and with the opportunity to explore the potential for growing spaces. As set out above, active travel will be fully supported and uptake of sustainable travel modes encouraged. Inclusivity, Health and Wellbeing Inclusive design is at the heart of the Draft Masterplan which promotes social cohesion and seeks to unlock opportunities to improve health and wellbeing through better accessibility, infrastructure and resources. The 4 objectives within this theme are key in the delivery of a successful redevelopment of the Shopping Centre which are set out below. 6 • IHW1. Use the Healthy Streets Approach to facilitate active travel choices such as cycling and walking that can improve accessibility, air quality, health and economic performance. • IHW2. Ensure open spaces and streets are designed to encourage active lifestyles, travel and play and identify opportunities for local food growing. • IHW3. Create green and accessible streets and public spaces that can accommodate vibrant uses, as well as offering places of tranquillity and rest for members of the community of all ages and abilities. • IHW4. Ensure that places are child-friendly and facilitate independent movement by young people around the area. The redevelopment of the Shopping Centre is based largely on increasing permeability, improving access to and within the site, facilitating movement into and out of the site and providing an active and vibrant shopping and lifestyle experience for all users of the town centre. Inclusive design will be fundamental to its success and will incorporate a Healthy Streets Approach, green streets and open spaces that are accessible to all. Character and Townscape The Draft Masterplan seeks to promote Romford's existing qualities and heritage assets in helping to create a vibrant and characterful place. It recognises the evolving character of Romford and the role new buildings will have in creating an environment that is desirable for residents and those who work in the area. • CT1. Develop a greater sense of character, consistency and quality in Romford's built environment and public realm. • CT2. Curate, nurture and enhance existing assets, including Romford Conservation Area and other designated and non-designated heritage assets, in order to collectively build a distinctive Romford character. • CT3. Ensure development is responsive to the needs of a growing local population and actively position the town centre in order that it provides an attractive offer to businesses and visitors. • CT4. Seek to redevelop or reanimate underutilised sites and buildings such as surface car parks. • CT5. Ensure developments enhance and reinforce the overall character and townscape of Romford, responding to its history and predominantly low- to mid-rise townscape. • CT6. Building heights should respond to the character of their setting with any taller elements, in

excess of six storeys, carefully considered and only supported where there is no adverse impact on the surrounding townscape. Redical broadly support the objectives of this theme of the Draft Masterplan. Objective CT4 seeks to redevelop or reanimate underutilised sites and buildings such as surface car parks. This is considered appropriate where car parking is underutilised however, to ensure access to all users and future potential users of the Shopping Centre and wider Town Centre, it will be important to provide adequate parking to meet the needs. Objective CT6 however is considered unnecessarily restrictive and may have a knock-on effect of stymying development. The Romford Draft Masterplan provides a high-level assessment of the townscape as a whole, without the detailed knowledge and analysis that comes with a specific application to a site. Therefore, while it should provide guidance and an indication of development potential, its remit does not allow for sufficient detailed analysis to create a de-facto limitation on tall 7 buildings in a Strategic Development Area, particularly in a townscape which already includes height above 6 storeys. Beyond broad guidance, appropriate heights and massing should be considered at a site level through discussions with the LPA and therefore the wording of any guidance should reflect this. Havering's Local Plan does not identify locations suitable for tall developments, as per Parts A and B of London Plan Policy D9, and in the absence of this and in line with the Master Brewer Case [R (London Borough of Hillingdon) v Mayor of London, 15 December 2021], tall buildings may come forward outside of allocated sites providing they meet the impact requirements of Part C of London Plan Policy D9. The existing townscape, particularly at Mercury Gardens, already includes heights of up-to 16 storeys, therefore the prevailing character already exceeds 8 storeys in some parts of the town centre. These existing taller buildings are not necessarily high quality and should not become the defining landmarks of Romford. As such, restricting heights to 8 storeys would be unnecessarily restrictive in the context of the Opportunity Area and Strategic Development Area and would not allow for enhancements to legibility and quality of the existing town centre. In a number of locations, including within Liberty Centre site, it would be possible to incorporate development taller than 8 storeys, with all the accompanying benefits to vitality and growth, without detrimentally affected heritage assets or character (i.e. key views). The Draft Masterplan's requirement for the 'enclosure ratio' to be 1:1 is not reflective of the context of the Metropolitan Town Centre where high street and local street heights often exceed the width of the road due to their density and to provide a strong sense of enclosure, as is characteristic of these major commercial and residential centres. Some of the most characterful townscapes in the world have an enclosure ratio much less than 1:1, for example The Shambles in York. Furthermore, a completely consistent enclosure ratio does not make for an interesting or high-quality townscape, as acknowledged by Gordon Cullen in The Concise Townscape (1971) which identified positive features such as 'narrows' and 'deflected views'. Variation and distinctive landmarks should be incorporated into the vision for Romford Town Centre to reflect its role in the urban hierarchy. And taller buildings should be considered appropriate if they meet the tests at Part C of London Plan Policy D9. The existing Romford townscape lacks a focal point; this affects wider legibility and wayfinding within the town centre, particularly to the east of South Street. Policy 1 Romford Strategic Development Area identified that The Romford Draft Masterplan would provide clarity on height strategies (6.1.32) and London Plan Policy D3 and Objective GG2 seek design-led optimisation of sites. Therefore, an overarching strategy for creating a focal point, optimisation and enhancing legibility should be part of the 'key moves' for the Draft Masterplan. In general terms, the Liberty Centre is the most sustainable location for intensification and creating a coherent focal point for the following reasons: a. Within Romford Metropolitan Centre and Strategic Development Area therefore close amenities, identified as a hub of activity and opportunity for 'transformational change' (fig 08). b. It is a highly connected location (easy walking distance to Romford Station) and local transport links. c. Site is between (and in some places part of) the key hub of town centre activity (Market Place and South Street) which has less capacity for intensification due to the Conservation Area, the civic hub at Main Road, and the existing ad-hoc cluster of taller / larger buildings at Mercury Gardens. d. It is possible for height to be incorporated in manner which is sensitive to the Conservation Area and key views within it. The scale of a future redevelopment of the Shopping Centre would be well-considered in the context of the surrounding and emerging developments and to ensure an optimum use of the site, ensuring the proposals are responsive and accommodate the needs of a growing population and therefore aligning with the

objectives of the Masterplan. A future redevelopment of the Shopping Centre would respond positively to the surrounding heritage assets including the Romford Town Centre Conservation Area, enhancing the character of the area and reinforcing the role of the Liberty Shopping Centre as a key retail and lifestyle destination for Romford and the surrounding area. Uses and Mix The Draft Masterplan seeks to strengthen and diversify the town centre, enhancing the retail offer and providing a much-improved evening/night-time economy to meet the needs of residents and others who use the town centre. There are 8 objectives which underpin this theme which are set out below. All of the objectives are relevant to the redevelopment of the Liberty Shopping Centre with particular reference to the Shopping Centre in US1 below.

- US1. Strengthen Romford's Metropolitan town centre status by focussing retail and other 'main town centre uses' around North Street / High Street, South Street, the Market Place, Romford Shopping Hall and the Liberty, Brewery and Mercury sites and improving the overall retail offer.
- US2. Diversify the range of uses within the town centre and nurture a safe and attractive early night-time economy, to support the town's vitality and long-term viability by giving people a number of reasons to spend time there.
- US3. Encourage the expansion of Romford's arts and culture scene as key attractors of visitors, businesses and residents by supporting proposals for additional cultural venues, such as live music venues and suitable workspace, and enhancing the theatre offer.
- US4. Incorporate active frontages throughout the town centre.
- US5. Encourage additional office space around Romford Station and other business space (including workspace) as part of mixed-use developments in other parts of the town centre.
- US6. Optimise the amount of housing throughout the SDA, without overdeveloping, to provide much needed new homes, provide activity throughout the day and aid financial viability of mixed-use schemes.
- US7. Ensure that the growth in housing and residential population is matched by additional necessary childcare, school places, health facilities and community space as part of mixed-use developments in locations that are accessible by walking and cycling and ensure that provision keeps pace with growth.
- US8. Require meanwhile suitable uses where buildings have been vacant for longer than 12 months and encourage developers of multi-phased schemes to identify a suitable meanwhile use strategy and programme of cultural activities to enliven otherwise vacant / underused land and buildings during the development process.

Improving Romford's retail offer is a key part of the future redevelopment of the Liberty Shopping Centre which will include a much-enhanced evening economy, providing active frontages and encouraging footfall throughout the daytime and evening. Diversification of the retail offer together with public realm enhancements will support other main town centre uses such as offices and other business space as well as meet the needs of new and existing residents. In addition, the redevelopment of the Shopping Centre would include provision of much needed new homes in this highly accessible and well-connected town centre location, drawing more people into the heart of Romford, realising its potential to be a thriving and vital retail and residential area for the Borough. Delivery of market Build to Rent housing would provide a significant contribution towards the revitalisation of the town centre, attracting a range of residents to the area, increasing footfall, further regenerating Romford. Redical are keen to bring forward a mixed-use scheme on the site, meeting the objectives of the Draft Masterplan and are proposing a refurbishment of a large part of the Shopping Centre, not only to meet many of the sustainable objectives of the Draft Masterplan and other national and regional policy, but also to ensure the vitality of the town centre continues during the course of the site's redevelopment. This sustainable approach will ensure the Shopping Centre can operate throughout the construction 9 period, therefore reducing the impact on existing retailers and ensuring Romford's retail needs are met. Economy The Draft Masterplan seeks to make Romford more attractive to businesses and establish the Town Centre as a destination with an improved retail offer and a diverse daytime and evening economy. This theme includes 8 objectives. Those which are most pertinent are set out below.

- E1. Capitalise on Romford's unique position at the interface between Essex and London and new Elizabeth Line services to attract new business occupiers to the town centre.
- E2. Revitalise and champion the Market Place to support a thriving and local market that is distinct and positive.
- E3. Promote Romford as a destination for business by increasing and diversifying the range and type of work and employment spaces available for local residents.
- E5. Create interrelated environmental, social and economic improvements that create a sense of place, increase civic pride, involve local people and create positive change. The redevelopment of the Liberty Shopping Centre will realise a

number of these objectives in delivering a revitalised Shopping Centre, contributing to the vitality and vibrancy of the wider Town Centre. It will become a destination and provide new jobs for the area and reinforce Romford's role as a retail and lifestyle destination, an employment centre and a residential neighbourhood. As part of the proposals there is opportunity to reinvigorate the Market Place, providing complementary retail floorspace that will enhance the overall retail offer in the Town Centre. Local residents and other stakeholders will be invited to engage with future proposals for the site and be involved at key stages during the planning process.

Section 6: Site Guidance Section 6.7 deals specifically with the Liberty Shopping Centre site. The site is pivotal in restitching Romford town centre due to its scale, stretching a city block, and its positioning and connectivity to both Romford train station and the historic Market Place - its regeneration presents a unique opportunity to transform a substantial quarter of Romford Town Centre to allow the town centre to grow sustainably and broaden its offer. We agree with the Draft Masterplan in identifying the need to improve north-south and east-west routes through the site. The existing layout means that the site is currently isolated and disconnected from its surrounding context, particularly in the evening. Greater permeability would help to integrate the site with the wider town centre through enhanced public realm and increased connectivity. Whilst we understand the approach set out within the Draft Masterplan, we believe that a hybrid approach to the site should be considered that can be equally benefiting to Romford – part retention of The Liberty Shopping Centre blended with new elements which will help to break down the large, singular existing mass of the shopping centre – affording vital key routes through the site whilst ensuring the vitality of the shopping core of Romford. We believe that this approach will create a varied offer of public spaces that provide different experiences, moving away from a potentially repetitive environment set out in the Draft Masterplan- to create a natural hierarchy of public spaces within the site. It is suggested that the Draft Masterplan could go a step further in recognising the fundamental role this site will play in achieving Romford's Town Centre regeneration vision – its redevelopment is a catalyst for transformational change of its Centre and will signal Romford's intentions in becoming a destination of choice. Its proximity to the Elizabeth line and connectivity to London is significant and should respond in kind – a gateway to Romford, a draw for residents and attracting those further afield. It can become a clear marker to the rejuvenated Town Centre. 10 The site in its design should be encouraged to identify itself accordingly in its representation of 'beacon of growth' in the heart of Romford with permitted height where appropriate, typically to Western Road, and gateway to the station, and along the ring road where there is existing height context. Height in these locations would not detract from the important historic nature of Romford but be envisioned to be necessary identifiers of the Town Centre as it evolves and expands.

Redical's Vision for the Liberty Shopping Centre The early aspirations for the site involve the retention of large parts of the shopping centre which will enable its ongoing operation, providing essential services to residents of Romford and those in the surrounding catchment. Continued operation of the shopping centre will retain many of the existing jobs on the site and minimise disruption to the town centre, limiting the impacts of the redevelopment. Whilst proposals for the site are in their infancy, we wish to set out the high-level strategy in bringing forward distinct areas of the site in a series of plots to enable a co-ordinated approach to development. Core mall retention The core section of the Liberty shopping centre remains an economically viable asset, with occupancy of 99% by floor area and strong footfall continuing to be seen. On this basis, the proposals for comprehensive mixed use redevelopment of the site are very much to enhance what is already a thriving asset, which brings economic and social benefits to Romford, rather than removing it in its entirety. We strongly feel that utilising this core mall in conjunction with mid-market build to rent housing will achieve comprehensive regeneration of this prime town centre location and ultimately deliver the quantum of homes envisaged by the masterplan, in addition to retaining the vast majority of The Liberty. Service road retention The current service road is integral to the day-day to functioning of the shopping centre, with all retail units being serviced downwards from this service road at first floor level. Retaining this service road is fundamental in allowing the core mall to still remain operational both during and after the construction of the new residential buildings. Through enhancing connectivity at ground floor through the site, this service road will continue to function as a vital vehicular route, and the interface between this road and new residential buildings will be dealt with appropriately through well considered design measures. Southern Plot –

Western Road 11 Part demolition of The Liberty Shopping Centre to the south and demolition of Lambourne House presents opportunities for:

- Creating a strong connection to the high Street and clear desire line to Romford train Station.
- Giving back space to the public along Western Road, and creating a strong gateway to the Liberty shopping centre from the south.
- Enhancing the established retail core to solidify it as a destination in Romford.
- Externalising existing retail frontages towards the high street to create a new character area interconnected to new public amenity.
- Activating Western Road with new retail and residential frontages.
- Most suitable location for taller buildings, given proximity to train station and distance from sensitive receptors, allowing greater housing delivery.

Northern Plot – Market Place and Mercury Gardens 12 Demolition of Laurie Walk and the disused car park, and retrofit of Mercury House presents opportunities for:

- A new northern gateway that restitches the disjointed Market Place with buildings that respond sensitively to the conservation area.
- Improving the streetscape with active frontages that respond to the Market context to strengthen Romford's retail offer.
- Improving pedestrian experience and permeability to Mercury Gardens.
- Providing new outside spaces that interconnect to its surroundings.
- Sustainably retaining and repurposing Mercury House through retrofit.

Western Plot – Market Place 13 Demolition of the Littlewoods building presents opportunities for:

- Reimagining the site without prejudicing Debenhams and any future development opportunities.
- Transforming the conservation area frontages with appropriate new architecture.
- Transforming Swan Walk into a more desirable pedestrian route, lined with strong commercial and F & B frontages, enhancing the nighttime economy.
- Diversifying the sequence of spaces with new pocket park.
- Creating a strong gateway into the Liberty shopping centre from the Marketplace.

Provides potential option for relocation of civic centre. Debenhams Building Despite being outside of Redical's ownership, we feel this building should be addressed in this consultation masterplan, to highlight the role it plays within an important frontage of the site to the marketplace, and the potential future development opportunity it presents. The current building does not lend itself to a residential retrofit, primarily due to the depth of the building. We do however feel that this part of the site would work well for a potential civic centre relocation, complimenting the wider mixed use redevelopment being proposed, whilst also providing a frontage that responds considerably to the current uses operating in the marketplace. Comprehensive regeneration of the town centre should involve addressing this building in some form, which is currently not the case in the Draft Masterplan.

Section 7: Implementation The significance of The Liberty Shopping Centre is clearly set out in the Draft Masterplan and is considered a 'catalytic project' with the potential to kick-start major development across the Town Centre. Redical also recognise the site's importance in realising many of the key objectives and strategies set out in the Draft Masterplan and welcomes the opportunity to comment on the Draft Masterplan and work positively and collaboratively with the Council in bringing forward the site to provide a much-improved retail offer and destination together with creating a new neighbourhood in this area of the Town Centre.

Feasibility study Redical have instructed a design team to carry out an intensive feasibility study over the last five months. The design team currently comprises the following parties:

- HUB - Development Partner
- ShedKM - Masterplanner/Architect
- Icen - Planning, Heritage and Transport Consultant
- Meinhardt - Structural & Civil Engineer

During this period, there has been a considerable amount of work done looking at how the demolition of the periphery areas of the shopping centre would work in reality, which has informed the designation of residential development plots. In addition, a robust planning strategy is being developed to optimise the number of homes that will come forward on the site to ensure the delivery of much needed new homes, recognising the site's capacity and accessible town centre location within an opportunity area. Every opportunity is being explored to ensure the appropriate use of this brownfield site, where under-delivery would not be considered the best use of land. The proposals seek to fulfil the residential floorspace ambition set out in the current consultation draft, whilst retaining the core economically viable part of the shopping centre.

c. Summary / Conclusion Redical are broadly supportive of the aspirations of the Draft Masterplan and welcome the opportunity to engage with the Council during the plan-making process. As set out above, this site is key in unlocking the potential of Romford Town Centre as the retail heart of the borough, providing a vibrant centre with much needed new homes, an improved retail offer and a diverse daytime and night-time economy. This will attract new residents to the Town Centre, generate employment and create a sense of vibrancy and vitality together with an enhanced public realm. The comprehensive

	<p>redevelopment of the site will include refurbishment of some of the existing Shopping Centre, although not anticipated as part of the Draft Masterplan, would fully align with its sustainable objectives. It is important that any future redevelopment of the site optimises capacity particularly in this well-connected Town Centre location, creating a new neighbourhood for the residents of Romford and reflecting the Masterplan's aspirations for increased density on the site. The Liberty Shopping Centre is recognised as a catalyst with the ability to kick-start development in the centre of Romford. Redical wish to fully engage with the Council to unlock the site's potential and indeed embrace its role as a catalyst for transformation, realising the benefits for the residents of Romford</p>	
<p>Planning Consultants on behalf of the owners of the Seedbed centre and the Rom Valley retail park</p>	<p>"This formal written representation pursuant to Regulations 12 and 13 of The Town and Country Planning (Local Planning) (England) Regulations 2012, has been prepared and submitted by DP9 Limited ('DP9') to the London Borough of Havering ('LBH') on behalf of Mitheridge Capital Management LLP (the 'Client'). This written representation is in respect of the Client's two sites below, both of which have been given a resolution to grant by LBH's Strategic Development Committee in December 2023, and will be collectively referred to as the 'Applications' where appropriate: 1. The Seedbed Centre and Rom Valley Retail Park, Rom Valley Way, Romford, RM7 0AZ (application ref. P2072.22) ('Application 1'); and 2. The Seedbed Centre, Unit E5, Davidson Way (application ref. P2071.22) ('Application 2') The description of development for Application 1 above is as follows: Outline phased development incorporating details of access to the site with all other matters reserved for a comprehensive redevelopment comprising demolition of existing buildings and redevelopment of the site for a mix of uses built over 3-12 storeys to include up to 840 residential units (Class C3), at least 3,000sqm light industrial (Class E) and general industrial (Class B2) uses, retail / restaurant / café up to 200sqm, associated landscaping, public realm, parking, refuse storage and other associated works. 2 The description of development for Application 2 above is as follows: Outline planning application with all matters reserved for the demolition of existing buildings and structures and redevelopment to create a 2 Form Entry School of up to 4 storeys including all associated works. As can be seen from the above descriptions of development the Client has gained resolution to grant for two large major applications consisting of, in summary, up to 840 residential units, a minimum of 3,000 sqm light industrial and general industrial uses, other commercial/retail uses and a 4-storey two-form entry primary school. Whilst these planning applications have been approved by the SDC they have not been formally granted planning permission at this stage, but it is worth noting that DP9, the Client team and LBH planning officers and legal team are in regular communications to progress and finalise the planning conditions and the Section 106 Legal Agreement. On the basis of the above, we welcome the opportunity to submit a formal written representation to the London Borough of Havering's Draft Romford Masterplan Supplementary Planning Document ('SPD') consultation, hereafter referred to as the 'Draft Masterplan'. Overall, the Client is supportive of LBH's intention to create a joined-up and comprehensive SPD to help guide appropriate residential, commercial and leisure development coming forward within the Romford Metropolitan Town Centre boundary, as identified within LBH's adopted Local Plan, London Plan and Draft Romford Masterplan SPD. However, it is our view that the 'Rom Valley' area of the Draft Masterplan requires additional drafting to take into account the Client's large, transformational applications currently on their way to receiving full planning permission. It is critical the Client's planning applications be referenced in the Rom Valley section of the Draft Masterplan given the red line boundaries for these applications form a significant proportion of the proposed Rom Valley area. The contents of this written representation will comment upon each section of the Rom Valley area of the Draft Masterplan. Section 6.6.2.1 states LBH's vision to deliver a predominately residential neighbourhood with an employment focus along Rom Valley Way, supported by appropriate small-scale retail, community and leisure uses fronting the Rom. The Client is supportive of this objective; and we note this objective aligns with Application 1 which provides a residential-led mixed-use development transitioning in scale and land use appropriate to the area. The 'land use' section below will discuss this in greater detail. However, it is our view that this Rom Valley area section should be premised with the fact that LBH is working with the Applicant to finalise planning conditions and Section 106 legal agreement regarding the Applications. Once the Applications have been introduced the rest of the Rom Valley area should be read in the context of guiding development within the remaining areas falling outside of the</p>	<p>Support noted. The Local Planning Authority note your comments regarding the outline planning permission granted for the site. It is considered, that as drafted, the site guidance allows suitable degrees of flexibility and interpretation and accords broadly with the layout of the outline planning application.</p>

	<p>Applications' boundary, as identified in the approved Application 1 and Application 2 site location drawings 1785-FPA-ZZ-ZZ-DR-U-16001-P07 and 1785-FPA-ZZ-ZZ-DR-U-17001-P04, respectively." CHARACTER AND TOWNSCAPE Section 6.6.3.4 of the Draft Masterplan outlines the 'more hostile' edge condition of the Rom Valley area can be more fronted by employment uses. Regarding massing, the section continues that massing should feather from north-south and from west-east into the residential context, but also defining busy roads and creating a softer edge to the River Rom. The Applications provide several new buildings ranging from 3-12-storeys and all have been extensively tested in townscape terms by the Applicant's design team and LBH's design and heritage officers. As such, Figure 100 should be replaced with the Development Plot and Building Heights parameter plans, references 1785-FPA-ZZ-ZZ-DR-U-16006 Rev P14 and 1785-FPA-ZZ-ZZ-DR-U-16005 Rev P12, respectively, to account for these massing treatments and height parameters. "Section 6.6.3.1 states that Rom Valley should be reconfigured to provide an urban block structure and uses mix. It continues that employment uses should be focused along Rom Valley Way and Oldchurch Road with retail/restaurants focused along the enhanced River Rom, and eastern aspects of River Rom-fronting blocks being suitable for a primary school. Table 22 outlines the Rom Valley Key Deliverables. The land use section should be aligned with the Applications to account for the approved land use quantum, location and distribution. Specifically, the Ground Floor Land Use Plan of Application 1 (ref. 1785-FPA-ZZ-ZZ-DR-U-16010 Rev P01) and the approved Plot Boundaries drawing of Application 2 (ref. 1785-FPA-ZZ-ZZ-DR-U-17005-P05). Section 6.6.3.2 outlines that development will be set back from the River Rom and requires each of the plots to provide open space along the Rom and incorporate both hard and soft public spaces. The Client supports LBH's ambition to increase greenery and ecology within the Rom Valley area, and this is evidenced in the Applications. For instance, Application 1 is will deliver an Urban Greening Factor ('UGF') of 0.41 (rounded), exceeding London Plan policy requirements. With a UGF of 0.33, Application 2 also exceeds London Plan UGF policy. Whilst the Applicant is generally supportive of the greening and ecological ambitions of this section, Figure 98 should be amended to reflect the approved Open Space Parameter Plan (ref. 1785-FPA-ZZ-ZZ-DR-U-16007 Rev P12), to account for the location of dedicated greenery and open space within the Applications. This is to ensure the Draft Masterplan aligns with the already approved Applications. Section 6.6.3.3 of the Draft Masterplan acknowledges the Rom Valley area's good access to public transport and accompanying Figure 99 shows an indicative street hierarchy and route networks. In a similar vein to the above, Figure 99 should be amended to account for the approved Access and Movement parameter plan (ref. 1785-FPA-ZZ-ZZ-DR-U-16004 Rev P12) for consistency. Whilst an indicative new bridge location shown on Figure 99, the Applications do not include plans for any new bridge. However, appropriate landing areas have been discussed with planning officers should any future developer seek to deliver a new pedestrian bridge over the River Rom, subject to detailed design discussions with the Environment Agency." Section 6.6.3.5 of the Draft Masterplan notes the importance of the existing employment uses within the Seedbed Centre being preserved throughout redevelopment of the site. The Applicant supports this implementation strategy and has designed this into the Applications' phasing strategy, which was agreed to with LBH planning officers during the determination of the Applications. CONCLUSION As outlined above in this written representation, the Client considers further drafting is required for the Draft Masterplan to be fully aligned with the approved Applications at Rom Valley Retail Park and the Seedbed Centre. This is to ensure that the Draft Masterplan is not outdated at the point of adoption, given the Applications will likely be formally approved by that point. Mitheridge Capital Management LLP wish to be kept informed of the progress with the Draft Masterplan and wish to be afforded the opportunity to provide further written representations at future consultations , where necessary, via the DP9 team</p>	
<p>Planning Consultants on behalf of the owners of the Homebase site</p>	<p>Fig 12 – Illustrative Masterplan Principles We observe that Figure 12 illustrates the masterplan principles for the Romford Area. Although the title indicates that the drawing is illustrative, the scheme depicted for the Homebase site differs from what was presented to officers during pre-application discussions. Please refer to Appendix A for the scheme previously presented at the pre-application stage. Additionally, the scheme covering the Seedbed Centre to the south does not correspond with the recently approved Outline Planning Permission for the site. Therefore, we recommend updating these sketches. Furthermore, this figure proposes a footbridge to the east of the site, connecting to the rear of the Page Calnan building. We strongly object to this</p>	<p>Comments noted. Minor changes have been made, as set out in section 3.3 of the consultation statement. Images, layout,</p>

<p>suggestion, as there is no clear and obvious desire line for a bridge at this location. The bridge would connect to the rear of the Page Calnan building, which currently consists of a large car parking area, making pedestrian connectivity challenging. We also question the viability of the bridge and who would be responsible for its delivery and maintenance "Section 4.3 – Key Themes and Objectives. This section of the Draft Masterplan Document identifies key themes and objectives for development within Romford. In general, the draft objectives are supported in principle, however, we are of the view that a number require clarification and additional clarity. For example, a key objective is to celebrate the River Rom and to provide public access, improving its immediate landscape, including deculverting and naturalising hard engineered edges. BL continue to agree to the need to improve the immediate landscape adjacent to the edge of the Rom. However, there are instances where full naturalisation and public access is not always possible. This should be apparent in the objectives, otherwise there might be an unachievable requirement placed on developers. Therefore, whilst the aspiration is supported, in principle, further clarity should be added that naturalisation should only be done where it is possible to do so. BL require some commitment from LB Havering that they would also support a design / engineered approach to de-culvert the river. Section 5.2 &amp; Figure 15 – Space and Landscaping Strategy This section of the Draft Document relates to delivering a liveable place for existing and new communities and the need to provide sufficient highquality, multi-functional open spaces to support an increase in residential. This principle is supported. However, again, there are instances where the masterplan refers to the River Rom re-naturalisation. There are instances where full re-naturalisation is not possible such as where there are implications regarding the retention of existing trees and where the EA require access to the Rom for maintenance. Figure 15 of the Draft shows the Space and Landscape strategy. We note that the strategy includes two areas of "main public spaces" located at the north western corner of the site adjacent to the roundabout on Old Church Road and another public space in the middle of the site (which appears to cover Davidson Way). The Draft Masterplan Document states that key public spaces are encouraged to host cultural events to support community activity and act as a positive interpretation of the physical environment. As demonstrated, by Appendix A, the inclusion of main public spaces does not accord with the preapplication proposals that have been presented to officers previously. The discussions to date did not establish a need for any public space at the site. The aspiration to open up of the site for public movement toward the town centre is accepted, however, the indicative locations and amount of the public space, including the potential use for cultural activities would conflict with the emerging proposals to redevelop the site. In addition, the proposed open space covering Davidson Way would conflict with the delivery of the school which was secured as part of the planning permission to redevelop the Seedbed Centre site. These issues would need to be reviewed in further detail. Furthermore, this figure proposes a footbridge to the east of the site, connecting to the rear of the Page Calnan building. We strongly object to this suggestion, as there is no clear and obvious desire line for a bridge at this location. The bridge would connect to the rear of the Page Calnan building, which currently consists of a large car parking area, making pedestrian connectivity challenging. We also question the viability of the bridge and who would be responsible for its delivery and maintenance. Paragraph 5.2.2.1 addresses the Rom Corridor, stipulating that new buildings should be set back by a minimum of 8 meters from the top of the riverbank to establish a broad, naturalised riparian corridor. We find this requirement overly prescriptive, as achieving an 8-meter setback is not always feasible. There are instances in Romford where proposed new buildings are situated less than 8 meters from the riverbank. Consequently, BL does not agree with this provision and believes there should be no restriction on the proximity to the river. Nonetheless, BL supports the principle of enhancing the Rom where practicable." "Figure 28 – Pedestrian Crossings and Figure 31 Street Hierarchy Figure 28 of the Draft Masterplan Document identifies public realm and access improvements, building on the liveable neighbourhood proposals. BL support proposals that will facilitate improved access for all modes of transport and proposals that make walking and cycling easier and more attractive. A number of pedestrian crossings appear to be proposed leading from the Homebase site into the town centre to the north via Bridge Close. These have not previously been discussed with BL. We note that these relate to the Liveable Neighbourhoods Connections, however, it is important to note that these crossings have not been designed or tested in any detail and it is not clear whether these are</p>	<p>enhancement and massing in the masterplan are illustrative and are intended to reflect the overarching vision and objectives for the site guidance and development principles overall. The SPD is not able to introduce new local policy, required to be inline with national and regional policy.</p>
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technically deliverable from a highways perspective. Therefore, BL recommends that clarity is added to the plan to make it clear to readers that further technical due diligence is required. Otherwise it could be misleading for individuals expecting to see pedestrian crossings at this location in the future. Furthermore, figure 28 shows a footbridge to the east of the site, connecting to the rear of the Page Calnan building. We strongly object to this suggestion, as there is no clear and obvious desire line for a bridge at this location. The bridge would connect to the rear of the Page Calnan building, which currently consists of a large car parking area, making pedestrian connectivity challenging. We also question the viability of the bridge and who would be responsible for its delivery and maintenance. Figure 31 identifies active travel streets traversing the site and leading to the northern boundary. These are noted to be primarily for pedestrians and for cyclists where appropriate. BL supports ensuring pedestrians and cyclists have priority in the redevelopment proposals for the Homebase site. However, it should be noted that access will still be needed from Rom Valley Way for vehicles entering and servicing the site. Whilst active travel streets are accepted in principle these will need to be balanced against the requirement to service the development. Figure 29 – Walking & cycling connectivity across the town centre This figure shows future pedestrian and cycle routes. However, again, it shows a footbridge connecting to the east of the Homebase site to the rear of the Page Calnan Building. BL object to the footbridge at this location given that other connections to the north provide more logical connections and links to the town centre. Figure 31 – Street Hierarchy. This figure illustrates the future street hierarchy, including an active travel street extending from the east of the Homebase site, crossing the Rom, and leading to the rear of the Page Calnan building. We strongly object to the inclusion of an active travel street and a bridge at this location. BL does not consider this an appropriate site for a bridge, as it fails to provide a clear desire line to the town centre and connectivity is hindered by the existing Page Calnan building. We also have concerns regarding the feasibility and deliverability of a bridge at this location. It has not been designed, costed, or tested, and therefore its viability is unknown. Consequently, the proposed bridge should be removed from the masterplan document." Paragraph 5.4.2.2 - BNGBL recognise the importance of delivering sustainable and biodiverse schemes which maximise the value of habitats wherever possible. However, it is noted that the requirement set out in the Draft Masterplan Document is that new development should be able to demonstrate a net biodiversity gain greater than 10%. This pushes beyond national policy standards. BL note that this is also contrary to the requirements of the Local Plan and London Plan. Securing in excess of 10% BNG is not a requirement of the Development Plan or national policy. The requirement could place significant constraint on development and reduce the amount of developable area. This could therefore impact the delivery of housing. We also note that where sites have an existing high ecology baseline, achieving in excess of 10% would be difficult and again would represent significant constraint to the development. "Para 2.2.4 - Townscape This section of the Draft Document refers to the townscape character of Romford. BL agrees that the existing Ring Road acts as a barrier to movement and access into the town centre restricting integration with the surrounding residential areas. However, BL support the aspiration to enhance connectivity to the town centre, specifically allowing the redevelopment of edge of centre sites where there are opportunities to establish walkways, crossings and connections from more suburban residential areas into the town centre. Para 2.2.5 and Figure 05 – Existing Heights This section of the Document refers to the existing heights across the town centre. The draft details state that the town centre is predominately low-rise, with a handful of higher rise buildings citing only Mercury Gardens and Waterloo Estate as these taller elements. We do not agree that the town centre is predominately low rise. This reference is more suitable to the context outside of the Strategic 3 Development Area where the context is clearly between 2-3 storeys. There are a number of instances where taller buildings have been approved which have changed the context of the town centre. As such, we consider that this section should identify committed developments and those currently in the planning system. Figure 05 within the Draft Document should therefore be updated to demonstrate the regenerative change and new context that is currently taking place in Romford. This section should address the following applications which are either committed or within the planning system: • Angel Way – Permission for 3 to 15 storeys (currently in construction); • 20 – 55 North Street – Permission for 4 to 16 storeys (currently in construction); • Rom Valley Way – Permission for 2 to 12 storeys; • Jubilee Park – 5 to 8 storeys (Built) • Leyland Court – 8 storeys (Built) • Waterloo Estate –

Permission for 3 to 16 storeys (currently in construction); • Seedbed Centre – Permission for buildings up to 12 storeys; • Bridge Close – under consideration for buildings up to 14 storeys • Como Street – at pre-application stage for buildings up to 9 storeys. In light of the above, it is evident that the context in Romford is changing to incorporate taller buildings. This should be made clear in the existing and emerging context sections of the Draft Masterplan Document. Fig 06 – Local Employment Areas Figure 06 of the Masterplan highlights existing character and opportunities across Romford. We note that the Homebase site is not separated from the Seedbed Centre to the south and that they appear as a single site. In our view, there should be clear separation between the two sites as they have separate designations in the Local Plan. As a minimum Davidson Way should be identified on the Plan to distinguish the two sites. The Homebase site is designated as ROM14 which is a housing led designation within the Romford Area Action Plan. The Seedbed Centre is identified in the Local Plan as an Out of Town Centre and Strategic Industrial Location. Figure 06 Labels part of the 4 Seedbed Centre site as a Local Employment Area which should not relate to Homebase given that it is identified as a housing scheme in the Romford Area Action Plan. It is therefore vitally important that there is a clear separation between the two sites to ensure that the Homebase site does not get incorrectly labelled as a Local Employment Area and the same designation for the Seedbed Centre does not get mixed-up with the Homebase site. Paragraph 5.6.2.2 – Contextual Height & Massing & Figure 53 – Heights. The Draft Masterplan Document sets out a range of heights at the Homebase site that are materially different from what has been presented and discussed with planners previously at pre-application stage. Figure 53 shows the Homebase site as being suitable for 4 – 8 storeys and with potential for some taller buildings (over 8 storeys). The Draft Document reads further that the frequency of taller elements should not be so great as to become the predominant height datum. The Draft also states that taller elements will only be acceptable in locations where existing character will be improved or complemented by the proposed development. 10 As demonstrated by Appendix A, the proposals developed to date comprise of a series of buildings ranging between 6 and 13 storeys. The proposed approach for the redevelopment of the site is for larger residential blocks with the general height and massing transitioning up in scale as the proposals reach the roundabout. The proposed taller elements are located at the edge of the town centre, and have been developed to create a marker adjacent to the town centre boundary and along the Romford Ring Road roundabout. The emerging proposal ensures a step change and transition in height across the development site to provide variety in scale and respond to the different boundaries. The work carried out by the design team demonstrated that the proposals were appropriately scaled in the context of the permitted schemes of Waterloo Road, the Seedbed Centre and the former Ice Rink site. The proposals also relate well to the emerging proposals at Bridge Close (up to 14 storeys) to the north. In addition, we note that the Seedbed Centre to the south was approved in 2023 with heights mediating between 4,6 and 12 storeys. The approved height context at the Seedbed Centre site is taller than that shown at Figure 53 and includes a 12 storey element boarding the Homebase site to the south. It is clear that there is a change in context around Rom Valley Way and the Ring Road with a clear increase in scale and mass emerging as the dominate character. As such, the Homebase site is entirely appropriate for taller elements. There was agreement in principle during the discussions in 2022 that up to 13 storeys at the site was acceptable as it provided a step change in scale from the Bridge Close development to the north. Therefore, the indicative heights shown across the Homebase site should be taller and align with what was presented at pre-application stage. The Draft Masterplan Document sets out a range of guidance for townscape developments. BL broadly supports the range of guidance proposed within the consultation document. However, we note that one of the guidance points relates to transitioning in height from adjacent context. The guidance states; “transitions in height from the adjacent context should not exceed 2 storeys”. We do not consider this to be appropriate guidance as it is a rigid approach to townscape development and limits the potential for buildings of scale that are required to deliver Development Plan objectives." "Para 2.3.1.1 – Retail Trends This section of the Draft Masterplan Document refers to retail and leisure trends. Given the continued rise in internet shopping, we consider that this section should provide further context with regard to the changing role of retail warehousing. Stores such as Homebase are not operating at capacity and represent underutilised assets at key locations which are appropriate for redevelopment for housing. Para 2.3.1.5 – Housing Pressures. This

section of the Draft Masterplan Document refers to the residential pressures across London and the attractiveness of Romford as a place to live, work and visit, which has helped in part due to the delivery of the Elizabeth Line. We agree with this background context. However, consider that further emphasis is required in relation to the housing issues being faced specifically in Havering. The latest Standard Method figures identify that LB Havering has a housing requirement of 2,429 dwellings per annum. The latest Annual Monitoring Report states that Havering only delivered 1,032 dwellings in 2022. The forecast figures set out in the AMR of the Borough's future supply are shown to be significantly below the 2,429 dwelling requirement. Allied to this, the Borough can only demonstrate a 3.4 years supply of housing land supply. Equally, the latest Housing Delivery Measurement places Havering at 55% which means that a presumption in favour of development is triggered for housing proposals. We therefore consider that stronger emphasis is needed in the Draft Masterplan Document on the need to deliver housing particularly on brownfield sites that are well located, such as the Homebase site. Para 4.2.3 – Multi-Use Developments. This section of the Draft Masterplan Document refers to "selected development sites" (which the Homebase Site appears to fall part of) and that these have significant potential to enhance and benefit Romford. BL agree that redevelopment of these development sites have excellent potential to transform and regenerate Romford and will assist in meeting a number of development plan objectives, and could provide significant contribution to the Borough's Housing numbers. However, reference is also made to the need for new development to be "multi-use to support the vision". We do not necessarily agree that the Homebase site needs to be a "multi-use development". For example, the Homebase site lies just outside of the town centre boundary and not located within a Local Employment Area or Strategic Industrial Location. As such, the existing use is not required to be retained as part of the redevelopment proposals and the site does not have a planning designation which requires a provision of employment space at the site. As demonstrated by Appendix X, the proposals 6 developed with officers during pre-application discussions have not shown a multi-use development (only housing) and we are of the position that the parameters agreed with officers during the previous discussions should be reflected in the Masterplan Document. Therefore, there is no need in planning terms to provide additional uses at the Homebase site. Paragraph 4.3.6 relates to promoting a diverse mix of uses in Romford. Reference is made to new residential use within the town centre. The Document states that new residential should support existing and new businesses, and that it should also have corresponding social infrastructure including schools, public spaces, health facilities and transport infrastructure delivered alongside the new residential. This point requires further clarity. We do not agree that all new residential development needs to be accompanied by corresponding social infrastructure and other infrastructure. A number of infill sites across the town centre are self-sufficient and well located, therefore not generating a need for additional infrastructure. Additional social infrastructure, without reviewing the need for the facility, can often lead to an oversubscription of social infrastructure and instances where developments are not required by potential end occupiers. We also suggest that that were social infrastructure is needed on site this could be dealt with through the provision 7 of a contribution to improve social infrastructure in other more appropriate locations. Paragraph 7.7.1 – Uses and Mix & Figure 56 – key moves and objectives for uses and mixThe Masterplan Document states that employment and business space is to be focused around the station, Waterloo Road and Rom Valley Way. 11 In this regard, Figure 56 highlights a number of inconsistencies from the scheme developed and discussed with officers at pre-application stage and the details proposed within the Draft Consultation Document. We note that the proposed designations listed should not relate to the Homebase site. For example, the consultation drawing shows the proposed residential block covering the Homebase site edged in pink. The pink edging relates to the delivery of "predominately employment" uses. As previously mentioned, the Homebase site is located at the edge of the town centre and not designated within the local plan as a Local Employment Site or Strategic Industrial Location. The existing retail warehouse is not a protected use, and therefore there is no planning requirement to deliver employment space at the location. The proposed delivery of employment space at this site would be contrary to the principles established. The Draft Consultation Document therefore needs to be amended as it implies that a significant amount of employment space will be delivered at site. As the Seedbed Centre (to the south) is designated as a Local Employment Area and Strategic Industrial Location, the employment focus should be directed to this

site and not Homebase. Therefore, demarcation of the two sites is needed to ensure that they are not defined as the same planning designation. In addition, the redevelopment of the Seedbed Centre was approved in outline in 2023, and therefore the massing and layout principles should also follow the approved details. The proposed general masterplan layout identifies the Homebase site as having two main public spaces, proposed to be located to the north east and south of the site. The delivery of these does not align with the pre-application discussions to date. It is also important to note that the Seedbed Centre was approved in outline with a school adjoining the Homebase boundary to the south. This is currently missing from the diagram. The proposed main public space, located to the south of the site, appears to have been included in the place of the approved school." "Thank you for providing us with the opportunity to engage with the consultation on the Council's latest Draft Romford Masterplan Supplementary Planning Document. We write on behalf of our client, Barratt London (BL), who have an interest in the Homebase site on Davidson Way, Romford RM7 0AJ. These representations provide observations on the Draft Masterplan Document in the context on the level of housing in the London Borough of Havering and in relation to our client's interest in the Homebase site on Davidson Way. The Homebase site is identified as part of the Rom Valley Character Area and is one of the 10 sites across the Masterplan area that is identified to have the potential for transformational change. The Rom Valley Area also includes the industrial units of the Seedbed Centre to the south and the Locally Listed Page Calnan Building and 222 South Street to the east. We fully support the aspirations of the Council to designate the site as an area for transformative change. The site has excellent development potential having been discussed at pre-application stage with planning officers for a number of years with the principle of development being agreed. Below we set out a brief summary of the context to the site before turning to specific comments on the consultation document. Context The site is approximately 1.96 hectares and is occupied by a large retail warehouse (Homebase) with associated parking and surface storage. The site is accessed to the southwest via Rom Valley Way through to Davidson Way slip road. The exist is located at the north-eastern corner which brings vehicles onto the Ring Road. The Draft Masterplan Document confirms that the town centre boundary is defined by the Ring Road, located along the northern boundary of the Homebase site. As such, the site is considered to sit at the edge of the town centre. In addition, the site is identified in the Romford Area Action Plan (2008) under Policy ROM 14 as a housing-led opportunity. Alongside this, the site is identified as part of the Romford Development Area (Policy 1 of the Local Plan) and identified in the Romford Town Centre Development Framework (2015) as a residential development opportunity (Opportunity 7). More widely, Romford is designated under the London Plan as an Opportunity Area. The London Plan sets an indicative housing and employment capacity for the Area at 5,000 new homes and 500 new jobs. The Mayor has also designated Romford a Housing Zone. The exiting retail store is currently operating, however, due to change in customer habits and the continued rise in online retailing, the store has not been operating at capacity. BL have been reviewing the site as a redevelopment opportunity for much needed housing. The site was first subject to pre-application discussions in 2019, then in 2021, and then again 2023. In addition, a Design Workshop took place in 2022. The nature of 2 the pre-application discussions have been protracted due to site acquisition issues, and not due to BL's aspirations to progress and deliver housing at this site. BL are due to complete on the site in 2024 and the intention is for pre-application discussions to resume toward the end of 2024 with a planning application submitted in 2025. The pre-application discussions to date have been positive with the principle of redevelopment of the site being acceptable. A number of design related matters have been raised over the years particularly relating to scale and mass of buildings across the site. However, the full redevelopment of site for residential has been agreed including the provision of taller buildings ranging up to 13 storeys. The recent option comprising of approximately 561 units was deemed to be an appropriate quantum that addressed massing concerns. We note that some of the principles previously established have not been accounted for in the recent Draft Masterplan Document, and the details covering the Homebase appear contrary to the pre-application discussions to date. We therefore set out comments on the Draft Consultation Document below. Comments on the Proposed Submission Version As mentioned, the Homebase site is identified within an area of transformational change. The Draft Document states that where a site/area is identified as being within a "transform" zone, there should be a substantial "increase" in developments by

introducing “new building types with scope to creating a new street pattern / frontage.” BL support the Council’s drive in this regard to transform underutilised brownfield sites in favour of housing. In this regard, BL fully endorse the aspirations behind the Romford Draft Masterplan to facilitate new opportunities and to make Romford an attractive place to live, work and visit. Para 2.4.1 & Fig 08 – Area of Transformation. Paragraph 2.4.1 and Figure 08 of the Draft Masterplan Document refers to significant potential for transformational change in Romford. The Homebase site is identified as an area of “Transform”. The definition of Transform is as follows: “Substantially increase developments by introducing new building types with scope to creating a new street patter / frontage”. 5 BL strongly supports the aspiration to transform parts of Romford and in particular the Homebase site for housing. The site lies in a sustainable location at the edge of the town centre and within the Romford Strategic Development Area. The existing retail store is not operating at full capacity and therefore there is significant opportunity to transform this part of Romford into a new residential quarter. We consider that the emphasis to transform is important to assist in the delivery of much needed housing. Section 6.6 – Development Principles & Figure 96 – Station Gateway site Opportunities and Objectives. The Homebase site is located with the Rom Valley Site Guidance Area. It states that the primary objective is to deliver a predominantly residential neighbourhood with an employment focus along Rom Valley. The Plan sets a need for residential to be supported by appropriate small-scale retail, community and leisure uses fronting on the Rom. As an initial principle BL supports the need to transform the Rom Valley into a new residential 12 quarter. We agree to the principles of transforming sites into an attractive and vibrant places with improved street definition and active frontages fronting onto the Rom. It states that development should adopt a transition in height from the town centre into the residential hinterland. BL supports the vision for the development on Rom Valley Way. Figure 96 shows the opportunity and objectives for the emerging development across the Rom Valley area. Figure 96 sets guidance notes for the development for the Homebase Site and the wider area. One of which is pinpointed on the northern boundary. This states; “Provide SME business space in range of units (30 – 150 sqm) of at least 3500 sqm fronting Oldchurch Road and Rom Valley, but serviced by a new on-site service road.” BL objects to the proposed objective of providing 3500 sqm of SME business space along Rom Valley Way. The label suggests that this should be delivered at the Homebase site, however, there is no planning requirement to deliver business space at the Homebase site. The Seedbed Centre to the south is designated in the Local Plan as a Local Employment Area and a Strategic Industrial Location, as such, it is this site that has a planning requirement to deliver employment floorspace. This diagram should also note that the permission covering the Seedbed Centre land (Ref. P2071.22) has secured 3,000 sqm of light industrial and general industrial space. This will therefore respond to the Draft Masterplan’s requirement for the delivery of employment space. We therefore do not consider that there should be a requirement for additional employment space covering the Homebase site, and this should come forward as a new residential quarter. Figure 97 – Indicative Ground Floor Uses. Linked to the comments above, Figure 97 shows an indicative ground floor use plan. This shows a number of uses covering the Homebase site. We note that the proposed residential plot is edged in pink. The key states that this relates to commercial / predominately employment focus. BL object to this proposed masterplan suggestion. In addition, two symbols cover the Homebase site that relate to development providing a “cultural focus” and a “leisure focus”. BL does not support the indicative ground floor use strategy. There is no planning requirement to deliver leisure or cultural uses at the site. The Local Plan 2021 sets out its objectives under Paragraph 5.1.15, which includes the need to regenerate Romford Town Centre, “providing a more 13 diverse and higher quality retail, leisure, cultural and employment offer.” The Local Plan therefore confirms that leisure and cultural uses should be directed to the town centre in the first instance. Whilst located in a highly sustainable location, the Homebase site is located at an edge of centre location where leisure and cultural uses are not deemed appropriate. These uses are considered more appropriate within the town centre boundary in the first instance.” Figure 98 – Indicative public open space provision and locations. As depicted in several masterplan illustrations, we strongly object to the proposed bridge across the Rom to the east of the site. We do not believe this location is logical, as it lacks clear desire lines and connections to the town centre. Figure 99 – Indicative Street Hierarchy and Access. As set out above, the indicative street hierarchy does not align with the information discussed and presented to pre-app previously. BL considers that the

	<p>location and design of pedestrian crossings needs further work before identifying them within the masterplan document. Again, we strongly object to a bridge at this location. Additionally, the images indicate a re-direction of traffic that was not discussed during the preapplication stage. There is also a substantial area of open public space located in the north-west corner of the site, which appears to extend over a significant portion of the Homebase development parcel. The redevelopment of the Homebase site for much needed housing should not be restricted or impacted by these public realm aspirations. Figure 100 – Illustrative Plan with key existing and proposed character features</p> <p>The illustrative plan at Figure 100 shows an illustrative layout covering the Homebase Site and Seedbed Centre Site. The massing blocks do not align with that presented and discussed with officers at pre-application stage. The illustrative plan also shows two areas of hard-landscaped open public space, which are “clearly defined by surrounding blocks and activated with retail, café / restaurants”. As commented on above, the proposal for a public open space has not been developed with BL and is contrary to what has been discussed with BL previously. The delivery of retail and restaurant uses at the site is not appropriate and not necessary in planning terms. A small amount of commercial space may be delivered at the site, however, this would be delivered in an effort to improve the placemaking of the site. In addition, the approved Seedbed Centre massing and School has not been identified on the plan. The proposed bridge adjacent to the site is also objected to. Figure 101 – Illustrative massing strategy</p> <p>This image presents an illustrative masterplan for the site, which does not align with what was previously presented to officers during pre-application discussions. Additionally, the image depicts a connection across the Rom via a bridge. We object to the inclusion of this bridge for the reasons previously stated.</p>	
<p>Romford Civic Society</p>	<ul style="list-style-type: none"> <li>• Further areas for clarification/ strengthening in the masterplan include:</li> <li>• No specification of the surface area which should be set aside for new publicly-accessible pocket parks.</li> <li>• The document misses the chance to identify the need for an integrated transport interchange for buses and rail by the station.</li> <li>• An evidence-based car-parking needs assessment should now be drawn up to shape implementation of the masterplan.</li> <li>• An evidence-based traffic survey should now be drawn up to inform the masterplan.</li> <li>• CT6, no detail as to how “adverse impact” of tall buildings would be assessed.</li> <li>• Does the commitment to enhancing the historic grain of the area apply along the whole of the southern side of the Market?</li> <li>• In the St. Edward’s Way Site Specific Guidance greater clarity on height and quality of build requirements of any development on the site next to the Golden Lion in the High Street would be extremely beneficial.</li> </ul> <p>"Romford Civic Society (hereafter “the Society”) is very supportive of the development of a masterplan for the town centre. We view the existence of a masterplan as central to the future development of Romford as, unique among the various policies which the local authority has with regard to the major urban centre in the borough and one of the major centres in London, it offers a reasoned and consulted-upon coherent vision of the centre of the town, taking into account the relationship of spaces and places to one another. We view the way in which the masterplan offers a broad vision of the whole town, and the relationship of individual sites within it, as central to the successful and attractive development of its urban grain in the future as a single whole and a marker for successful urban development elsewhere. In this context of whole-heartedly supporting the development of the masterplan and the approach which since Spring 2022 the Council has taken to its development, the Society identifies a wide range of aspects of the document as it currently stands which it welcomes, some which it feels would benefit from further clarification and some where we feel that further work is required. Before continuing, it would be worth emphasising that the role of the Society relates only to the environment of central Romford, new-build, green and biodiversity, streetscene and conservation of the historic environment. It does not go beyond this. In this light, the Society enthusiastically welcomes many aspects of the draft masterplan, including:</p> <ul style="list-style-type: none"> <li>• The establishment of clear height parameters. We hope that this will be a very useful tool in beginning to challenge the introduction of very tall buildings to the town which arose directly from the laissez-faire approach taken by the Administration of the borough prior to May 2022, and has been so very unpopular with local people.</li> <li>• We are pleased to see South Street identified as a key priority on p.79 of the document and the explicit recognition that it is the spine of the urban structure of the town contained on pages 49 and 53. The Society believes firmly that South Street has a vital role to play in integrating and linking the broader environment of central Romford and so welcomes this recognition, though we do have some concerns about implementation, to which we</li> </ul>	<p>Support noted. Definition of pocket parks added. Wording throughout the masterplan enhanced. The Council will consider suitable models and governance mechanisms for a Romford Delivery Board.</p>

will turn later in our response. • We view North Street as a key, but currently unsatisfactory, approach to the town. Therefore, we welcome the recognition in the masterplan that the street currently suffers from a disjointed public realm and the commitment to rectify this contained in the document. • We welcome the commitment to establish the River Rom as an ecological linear park and the association of this with the Thames River Basin Management Plan and the achievement of Good Ecological Status of the Water Framework Directive. • We welcome that the masterplan clearly identifies that historic buildings are to be retained. Most specifically, we were extremely glad to see that the document echoes and strengthens the Council's long-standing position that the Page-Calnan building in South Street must be retained in any future changes of use, and the recognition of the importance and appeal of the façade and structure of the bus garage facing onto North Street. • We welcome the recognition that the quality of building materials used will be central to the quality and interest of the environment of central Romford on p.83. • We welcome the identification of protected views within the document. • We welcome the recognition that engaging frontages will be central to the quality of the environment of the town in the future. • We welcome the commitment to transform Romford into a Zero Carbon Town (p.51). • We welcome the commitment to new communal gardens and allotments in central Romford. • We enthusiastically welcome the recognition that the setting of historic places and buildings in the area covered by the plan requires significant improvement. • We welcome the proposal to establish a Romford Delivery Board to oversee implementation of the plan. • In the Site Guidance Overviews, we were extremely glad to see reference to the importance of the historic grain on the south side of the Market Place, to appropriate scale and massing of any new buildings in this context (establishing a maximum height of 5 storeys) and of improved linkages between the Market and the rest of the town. • We were glad to see new green spaces suggested near the Market. • We welcome the document's commitments to Biodiversity Net Gain and Urban Greening Factor. There were a number of areas where we felt further clarification or work was required. • A key aspect of the environment of Romford in general is how it has always acted as a focus for ideas about how to arrange spaces and places in order to create coherent and legible environments in the changing circumstances of the times – an approach dating back to the eighteenth-century. • In this context, we see the conscious integration of landscape and architecture in a new way at Bower House and the land around it in Havering-atte-Bower by the nationally significant pairing of the landscape designer Charles Bridgeman and the architect Henry Flitcroft. New devices were used to manipulate the landscape and focus it on the new Palladian-style villa at its centre. • In the Victorian era, new approaches were used to ensure clear hierarchy and coherence in the rapidly changing urban environment of the centre of Romford, with its urban fabric the focus of attention for the first time as it rapidly expanded and changed, as did many towns throughout the nation at this time. In Romford, however, new ideas about establishing a coherent and linked hierarchy of spaces and places were enthusiastically embraced with the development of (largely now lost) innovative civic and community buildings in the Market (of which, only St. Edward's Anglican Church remains) forming a central point and effective contrast for the regular street pattern lined with residential properties of varying types being developed around it. • The Victorian development engaged nationally-significant architects such as John Johnson (who went on to design Alexandra Palace) and embraced the new idea that the form of a building should express its structure and that its design should reflect its function – using a new historicist approach to do this. Both of these features swept away the diametrically opposite approach which had been used at Bower House, for example. • Perhaps the most famous example of a coherent approach to the arrangement of spaces and places are the 1911 and 1936 Romford Garden Suburb, which rejected the approaches taken by the Victorians in favour of the latest wave of new ideas. • In this context, it is disappointing that the masterplan does not more clearly identify the, currently, highly fractured environment of central Romford – which is inferred in many of its observations – and establish the remedying of this problem as one of the key aims of the document in its vision. • Clear analysis of the problem will help give focus, drive and justification to the document and help give purpose and rationale to individual actions proposed. • It is disappointing that the environment is not mentioned at all in the vision statement for the town proposed in the document. • Sections of the draft masterplan where the fractured and fragmented environment of the centre of the town are clearly inferred include: • 2.2.3 (Key Heritage Assets) which identifies the layered nature of the historic environment. It would be

	<p>advantageous if the document were more specific that lack of association between those layers is a key problem. • 2.2.4 mentions that only one shopping centre is open outside normal hours and how service frontages of the shopping centres contribute to poor quality public realm. It would be useful if the document pushed this observation further and identified that there is a fracture between the shopping centres and the town they are in. • P 17/ 47 implies a fracture between residential areas in the town and the town itself. • 2.2.6 isn't clear enough that a further fracture is between the urban centre of the town and ecosystems. • To these we could add the potential fracture of adding significant new development to the town, unless action to ensure a coherent and linked environment is clearly identified as an aim of the masterplan. • South Street split between a number of areas of Site Specific Guidance. Will this not mitigate against the development of a coherent plan and set of standards for the street? • No "owners" (responsible departments) are identified for the action points in the action plan. • The quality of shopfronts should be identified as one of the key factors in determining the environment of central Romford and a specific link made to the Shopfronts SPD which details policy in this matter. • How will there be public accountability for the work of the Romford Delivery Board?"</p>	
<p>The owners of the former Gasworks site</p>	<p>Part 6.11.3.2 Open Space, Streetscape and Ecology, page 194 4.29 As the SPD promotes residential development, against the current aspirations of the landowner, the document's current proposal is for a new local park to support the potential future residential population on the Site. This open space proposal would still need to account for the site-specific constraints, particularly the gas infrastructure, which is a further delivery constraint against the SPDs vision. 4.30 A park would not be a viable option as part of a I&amp;L proposal. The future I&amp;L proposal can offer landscape buffers to protect adjacent residential properties, which can bring its own ecological benefits to the Site. Berkeley therefore request that Part 6.11.3.2 is reconsidered to reflect the illustrative proposal for the Site as set out within Section 5. Part 6.11.3.3 Access and Movement, page 195 4.32 As drafted, the new routes proposed by the SPD through the Crow Lane site would not be compatible with an I&amp;L proposal. 4.33 It is acknowledged that routes in and out of the site for I&amp;L proposals need to be considered so not to impact on the existing road network. 4.34 It's considered that the I&amp;L proposal for the Site is capable of being appropriately accommodated within the existing infrastructure of the wider area, subject to a Transport Assessment prepared to support any future planning application. 4.35 Berkeley therefore request that Part 6.11.3.3 is reconsidered to reflect the illustrative proposal for the Site as set out within Section 5, and will discuss the future Access and Movement proposals for the Site with the Council during pre-application meetings. Part 6.11.3.4 Character and Townscape, page 195 4.36 The current wording within the SPD relates to "A new built-residential area" which is no longer the aspiration for the Site. 4.37 Whilst it is recognised that heights and massing should be located away from sensitive neighbouring areas, i.e. the residential development on the east boundary; I&amp;L development proposes bulk, scale and massing in a much different way to the design requirements of modern residential development. The delivery of high-quality industrial warehouse units on the Site, which given the surrounding context, are considered more suitable than tall, high-density, residential buildings. 4.38 Berkeley therefore request that Part 6.11.3.4 is reconsidered to reflect the illustrative proposal for the Site as set out within Section 5. Section 5.6 CHARACTER AND TOWNSCAPE Part 5.6.2.4 Urban Grain &amp; 5.6.2.5 Streetscape 4.48 Figure 54 shown on page 96, and Figure 6 shown on page 97 of the SPD are interlinked as they show the proposals for new streets being introduced to the Crow Lane site. Figure 6 specifically states "new residential streets with predominantly 4 to 6 storeys townscape". 4.49 Given the Industrial &amp; Logistics proposal for the Site, Berkeley request that these figures are removed from the SPD as they are considered irrelevant to the proposals for the Site, as set out within Section 5 of this statement. Part 6.11.3.1 Land Use, page 193 4.15 Berkeley OBJECTS to the proposed Land Use proposals for the Site. 4.16 As currently drafted, the SPD seeks the following: "A primarily residential neighbourhood, Crow Lane can support a limited amount of retail and commercial spaces to support the local residential population. These should be clustered centrally to improve visibility and cross-usage. Employment uses, potentially creative workspace, could be located next to the railway embankment to provide a buffer to residential uses. Due to the somewhat peripheral location to the town centre, these could be smaller-floor-plate buildings that could support, for example, SMEs or creative workspaces. 4.17 The Land Use above is considered to be in conflict with the existing site and relevant policies within the Local Plan. The Land Use quantum and</p>	<p>Comments noted. References to the Royal mail site have been updated and minor changes have been made to correct inconsistencies, as set out in section 3.3 of the consultation statement. The Council will continue to support residential on the Crow Lane site.</p>



heights identified for the site would also not be deliverable or viable given the site-specific development constraints. 4.18 The Site comprises vacant, brownfield employment land. Whilst most of the relevant infrastructure is largely neither present nor operational, there are still numerous operational parts of the site including a District Gas Governor, a telemetry building and live pipe work; therefore, the land retains its Sui Generis use for gasworks utilities (an employment generating use). The Site is not a Strategic Industrial Location (SIL) or Locally Significant Industrial Site (LSIS). It is non-designated employment land. 4.19 SPDs must be in conformity with policies contained within the Local Plan because they are intended to provide further detail and guidance on policies already established, rather than introducing new policies or conflicting requirements. The Site is not formally allocated for residential development in the adopted Local Plan (2021) and should therefore remain recognised as an employment generating site. 4.20 Policy 19 (Business Growth) supports proposals which improve the physical appearance, attractiveness and competitiveness of employment areas (criteria vi). 4.21 Therefore, a proposal to intensify and continue an industrial use in this location is likely to be viewed favourably, particularly given the poor aesthetic condition of the Site. 4.22 The policy also encourages and promotes supporting the strategic growth potential of the Borough in logistics activities of greater than sub-regional importance, as set out in the London Plan (criteria xi). 4.23 The supporting text to Policy 19 details that LB Havering is identified in the London Plan as suitable to be developed as a Strategic Outer London Development Centre (SOLDC) as it has a strategic significant growth potential in logistics activities of greater than sub-regional importance. 4.24 Policy 20 of the Local Plan seeks to maintain or enhance the employment potential of non-designated employment land, ensuring a strong and prosperous economy. Policy 20 states that the Council will only support the loss of non-designated industrial land where it can be Quod | Romford Gasworks | Romford Town Centre Masterplan SPD | November 2024 12 demonstrated that (inter alia; part ii.) "There is no market interest in the site following one year of continuous active marketing". 4.25 As Havering are aware, Berkeley have received significant market interest in the Site, including from the London Ambulance Service (LAS). We considered that this would therefore be a conflict with Policy 20 part ii) of the Local Plan (2021) if LB Havering were to release this non-designated employment land site which has significant market interest for I&L. 4.26 It is also important to note that the proposed residential quantum within the SPD's Vision is unlikely to be deliverable due to the extensive site constraints, as highlighted throughout this statement. 4.27 We therefore request that the above Land Use statement is removed and amended to reflect the Industrial and Logistics proposal for the Site, as set out within Section 5 of this statement. 4.28 We request the following amendments to "Table 32. Crow Lane Key Deliverables", shown on Page 193 of the consultation document, are made: Table 32. Crow Lane Key Deliverables Key Deliverables Quantum (GIA) Public open space Approx. 1.0ha Residential 50 000 - 70 000 m2 Retail and similar uses 1 000 - 2 000 m2 Employment / commercial 12 500 - 25 000 m2 [within approximately 8.7 acres of land take] Ambulance Station Approximate 2 acres of land take. [Built development to be confirmed through further discussions with LAS and pre-application discussions.] Total built area [Built development to be confirmed through further pre-application discussions.] Public town centre car parking On-street parking only. This submission is made by Quod of behalf of Berkeley Homes Capital ("Berkeley") to the London Borough of Havering ("the Council") regarding the draft Romford Town Centre Masterplan Supplementary Planning Document ("SPD") 2024 consultation (30th September 2024 to 11th November 2024). 1.2 This representation relates to Romford Gasworks, Crow Lane, Romford, London, RM7 0GW, known as Romford Gasworks ("the Site"). 1.3 The purpose of this representation is to demonstrate that the Site should be considered for Industrial & Logistics (I&L) use, which aligns with both the Site's historic and current use and will be supported by future technical work to inform the Site's optimised delivery, rather than the Site being earmarked for residential use as per the current draft of the SPD. Context of the Representations 1.4 Supplementary Planning Documents can cover a wide range of issues and can be used to expand policies contained within policy documents. They must be consistent with National Planning Policy, must undergo consultation and must be in conformity with the Local Plan. 1.5 Paragraph 11 of the National Planning Policy Framework ("NPPF" or "The Framework") requires that "plans and decisions should apply a presumption in favour of sustainable development". 1.6 For plan making this means the following: All plans should promote a sustainable pattern of development that seeks to: meet the

development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects. 1.7 The NPPF, Paragraph 35, considers plans to be 'sound' if they meet the following tests. a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and Quod | Romford Gasworks | Romford Town Centre Masterplan SPD | November 2024 2 d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant. 1.8 As recognised within Annex 2: Glossary of the NPPF, Supplementary Planning Documents are defined as: "Supplementary planning documents: Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan." 1.9 National Planning Policy Guidance (NPPG) states that SPDs should be built upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development. 1.10 Berkeley OBJECTS to the Romford Masterplan SPD's vision for the Crow Lane site to deliver residential development on the Romford Gasworks site, for the following reasons: ▪ The Site was never formally allocated for residential development in the adopted Local Plan (2021). ▪ There are still numerous operational parts of the site including a District Gas Governor, a telemetry building and live pipe work; therefore, the land retains its Sui Generis use for gasworks utilities (an employment generating use). The Site is not a Strategic Industrial Location (SIL) or Locally Significant Industrial Site (LSIS). It is non-designated employment land. ▪ The SPD states the Crow Lane site is within single ownership. This is not the case, the Crow Lane site within the SPD includes three separate landownerships – St William Homes LLP (Berkeley), National Grid Twenty Seven Limited, and Cadent Gas Ltd. This is a significant delivery constraint to the SPD's masterplan proposal for Crow Lane. ▪ SPDs must be in conformity with policies contained within the Local Plan. Policy 20 of the Local Plan seeks to maintain or enhance the employment potential of non-designated employment land, ensuring a strong and prosperous economy. Policy 20 states that the Council will only support the loss of non-designated industrial land where it can be demonstrated that (inter alia; part ii.) "There is no market interest in the site following one year of continuous active marketing". As Havering are aware, Berkeley have received significant market interest in the Site, including from the London Ambulance Service (LAS). ▪ The SPD proposal straddles land outside of Berkeley's ownership as well as across Cadent's Pressure Reduction Station (PRS), other items of gas infrastructure that has 1 Paragraph: 008 Reference ID: 61-008-20190315 Revision date: 15 03 2019 Quod | Romford Gasworks | Romford Town Centre Masterplan SPD | November 2024 3 associated easements, and no build zones covered by the Planning Advice for Developments near Hazardous Installations (PADHI+) Zones (Health and Safety Executive's (HSE's) advice service). ▪ Given the site constraints and the exceptional costs associated with the site enabling and remediation works, this would drive the need for high density development on viability grounds when considering residential development. It is our opinion at this stage that the quantum and heights identified within the SPD's proposal for the Site are not deliverable or viable given the proposed scale and storey heights as indicatively shown within the SPD (Page 197 - Figure 141: Illustrative massing strategy; Page 94 - Figure 53: Height Strategy). 1.11 This report's purpose is to demonstrate that the Site is appropriate and suitable for wholly Industrial & Logistics (I&L) use. It: ▪ Is sustainable, having regard to the policies and guidance of Government Planning Policy (NPPF and NPPG). ▪ The I&L proposal for the Site is capable of being appropriately accommodated within the existing infrastructure of the area, subject to mitigation which can be addressed appropriately through any future

planning application. ▪ Represents a sustainable location to meet employment needs within Havering. ▪ Will bring forward a broad range of associated benefits upon its delivery, including job creation and employment generating floorspace. ▪ Will not result in any unacceptable impact in relation to any environmental interests of relevance. 1.12 We trust that these representations provide a constructive commentary and request that this submission is considered as part of the consultation exercise. 1.13 Berkeley would be pleased to discuss any aspect of these representations in more detail if it would be helpful to the Council and we look forward to engaging with the Council and other stakeholders in the ongoing preparation of the emerging Romford Town Centre Masterplan document. Site Context 2.1 The Site comprises vacant, brownfield employment land. Whilst most of the relevant infrastructure is largely neither present nor operational, there are still numerous operational parts of the site including a District Gas Governor, a telemetry building and live pipe work; therefore, the land retains its Sui Generis use for gasworks utilities (an employment generating use). 2.2 With the exception of small outbuildings for retained infrastructure, and one remaining disused building, there are no other permanent buildings on-site and the site is largely laid to concrete. 2.3 The site currently benefits from a 3-year temporary planning consent for open storage (Class B8) which expires on 30th April 2026. 2.4 The Site is not a Strategic Industrial Location (SIL) or Locally Significant Industrial Site (LSIS). It is non-designated employment land. Background 2.5 The Site was previously designated as a Secondary Employment Area in the 2008 Local Development Framework. This designation was removed in the Havering Local Plan 2016-2031 (adopted 2021). As part of the employment evidence base for the Local Plan, the Council issued a Call for Sites in 2014. National Grid put forward the gas works site and the land to west of the Royal Mail site forward for removal from the Secondary Employment Area designation and proposed the sites for residential use. 2.6 Havering's Employment Land Review (April 2015) concluded that the gas works site (both eastern and western sites) should not continue to be designated as Secondary Employment Area as they are unlikely to be redeveloped for industrial use and would offer regeneration opportunities. The Review recommended retaining the adjacent 2.4 ha Royal Mail site as an LSIS. These recommendations were taken forward through the Local Plan. 2.7 It should be noted that the Call for Sites (2014) exercise and Employment Land Review (2015) were both prepared c.10-years ago. During this time, the economics and financial viability of such sites has been impacted dramatically by very high inflation and significant structural changes to the planning, tax and regulatory regimes. It is therefore right for landowners, such as Berkeley, to reconsider the best and most sustainable use for such sites. 2.8 LB Havering then adopted the Local Plan (2016-2031) in November 2021, which removed the previous employment designation and included the site with the Romford Strategic Development Area (RSDA) (which is designed as an Opportunity Area within the London Plan 2021), for 6,000 new homes over the plan period, along with 500 jobs. 2.9 As part of the housing delivery evidence for the Local Plan, the Council put forward capacity studies for a number of sites including the Gasworks. The Gasworks site is included in the Quod | Romford Gasworks | Romford Town Centre Masterplan SPD | November 2024 5 Council's 2019 Housing Trajectory with an indicative figure of 450 units (based on the capacity study), the figure relates to the wider site including the area to the north, which is an additional area of land outside of Berkeley's ownership. 2.10 It should be noted that despite the site forming part of the RSDA and being identified as part of the Local Plan evidence base, the site was never formally allocated for residential development in the adopted Local Plan. 2.11 The northern part of the site is safeguarded for Crossrail, albeit the completion of the Elizabeth Line means that this land is no longer required and is therefore unlikely to act as an impediment to development. 2.12 Gasworks sites are known to have site-specific development constraints, as recognised within the London Plan (2021), including contamination which can require extensive enabling and remediation work, on-site gas infrastructure and the requirement for acoustic mitigation. These constraints often stymie redevelopment of such sites, often more so for residential than for non-residential development. 2.13 Figure 2.1 below provides a visual representation of some of the site constraints at Romford Gasworks. The Development Plan 3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires decision makers to determine planning applications in accordance with the development plan unless material planning considerations indicate otherwise. 3.2 The National Planning Policy Framework ('NPPF') (2023) sets out the Government's planning policies for England and how they should be applied. It also sets out a framework in which Local Plans

must be produced. 3.3 The NPPF recently underwent a round of consultation on a number of draft updates to policy and supporting text, which indicates a clear direction of travel in showing stronger support for growing the economy and giving additional weight to sustainability in industrial developments. 3.4 For any development of the Site, the development plan comprises: ▪ London Plan (March 2021) ▪ Havering Local Plan ('HLP', November 2021) ▪ Site Specific Allocations DPD (adopted 2008). London Plan 2021 3.5 Within the London Plan, Romford is identified in the London Plan as an Opportunity Area (OA) with potential for 5,000 new homes and 500 new jobs by 2041. The OA was designated 2021 and is part of the Elizabeth Line East Growth Corridor. 3.6 Part D of Policy SD10 of the London Plan states that boroughs should develop locally sensitive policies and initiatives and support development proposals that contribute to the renewal of town centres in Strategic and Local Areas for Regeneration. The Local Plan does not explicitly identify strategic or local areas for regeneration, but it does recognise Romford as a key regeneration area at Paragraph 5.1.5 (within the Havering Local Plan (2021): "Romford is identified as a metropolitan centre in the London Plan and is the largest town centre in the borough. Romford has scope for development across a number of well-located and well-connected sites. The Local Plan recognises its potential for significant regeneration and intensification. Romford is already a key transport hub in Havering with more than 25 bus routes using the town centre. A minimum of 6,000 new homes will be delivered in the Romford Strategic Development Area. From 2019, it will benefit from improved rail services as a result of the arrival of Elizabeth line services through Crossrail. Its potential has been recognised by its designation as a Mayoral Housing Zone and the Local Plan will provide the means to assist in accelerating the delivery of new homes on a number of sites in and around the town centre. This plan also envisages business growth [Quod emphasis] and an expanded leisure and cultural role for Romford. The next London Plan will re-affirm the role of Romford by designating it as an Opportunity Area in recognition of its potential to address an important part of Havering's growth potential." Quod | Romford Gasworks | Romford Town Centre Masterplan SPD | November 2024 7 3.7 London Plan Policy E4 (Land for industry, logistics and services to support London's economic function) which requires a sufficient supply of land and premises in different parts of London to meet current and future demands and states that related functions should be provided and maintained. 3.8 London Plan Policy E7 (Industrial intensification, co-location and substitution) states that development proposals should be proactive and encourage intensification of business uses (B1C (now E(g)(iii)), B2 and B8) through amongst other matters more efficient use of land. 3.9 London Plan Policy D1 (London's form, character and capacity for growth) and D3 (Optimising Site Capacity) which require a design led approach which optimises site capacity taking into account site context. Havering Local Plan ('HLP', November 2021) 3.10 Within the Havering North Policies Map the site is located within the Romford 'Strategic Development Area' under Policy 1. 3.11 The northern half of the site is also a 'Retained Site Specific Allocations Crossrail Safeguarding' under Policy SSA10 Crossrail. It is located within the Strategic Development Area of Romford and adjacent to the Metropolitan Green Belt. 3.12 An extract of the Policies Map (North) November 2021 is shown below. Figure 3.1 – Policies Map (North) November 2021, showing the Site 3.13 Policy 1 (Romford Strategic Development Area) states that over the plan period the Council will support the delivery of over 6,000 new high quality homes in well managed residential and mixed use schemes that provide attractive places to live and which are well integrated with the existing community. 3.14 Policy 3 (Housing supply) aims to deliver the London Plan housing target for Havering (at least 12,505 new homes) including 5,000 homes on major sites in the Romford Strategic Development Area. The supporting text to the policy refers to the Council's Housing Position Statement (October 2019) which is a key piece of evidence supporting the Local Plan. At annex Quod | Romford Gasworks | Romford Town Centre Masterplan SPD | November 2024 8 5 of the Position Statement a Capacity Assessment of the Site confirms the following approximate development areas: ▪ Total site area: 6.2ha ▪ Total area GIA: 34,320 sqm (including a mix of houses and flats) ▪ Total units: 450 units, including 66 houses. 3.15 Policy 19 (Business Growth) of the Local Plan supports proposals which improve the physical appearance, attractiveness and competitiveness of employment areas. Therefore, a proposal to intensify and continue an industrial use in this location is likely to be viewed favourably, particularly given the poor aesthetic condition of the Site. Without the proposal for employment generating uses on the site, the site will remain underutilised and vacant or in open storage use, which serves no benefit to Havering

or the local residents. 3.16 Policy 20 (Loss of locally significant industrial sites and non-designated land) generally seeks to maintain or enhance the employment potential of non-designated employment land, ensuring a strong and prosperous economy. Policy 20 states that the Council will only support the loss of non-designated industrial land where it can be demonstrated that: i. The change of use from industrial employment uses will not lower the industrial capacity of the borough below that necessary to meet projected demand over the planning period as estimated by the most up to date Havering Employment Land Review. ii. There is no market interest in the site following one year of continuous active marketing. Part 6.11.1 Existing Context, page 190 4.3 Berkeley requests that the 'Existing Context; within the SPD should be amended to make reference to Royal Mail's Romford Mail Centre located immediately adjacent to the west of the Site. The Romford Mail Centre operates 24-hours, 7-days-a-week, and is allocated as a Locally Significant Industrial Site (LSIS) within the Havering Local Plan (2021). 4.4 We request the following amendments to "Table 31. Existing Crow Lane uses", shown on Page 190 of the consultation document, are made: Table 31. Existing Crow Lane uses Existing Crow Lane Uses Quantum Open storage / vacant land Former Gasworks site – Sui Generis - N/A 10.7 acres Temporary Open Storage - N/A. Berkeley OBJECTS to the proposed vision for the Site. 4.6 The Vision for the Site currently states that Crow Lane should: "... emerge as a cohesive and attractive residential neighbourhood with high-quality public realm and improved walking and cycling connections to the town centre and through the railway embankment. New buildings should complement each other to create a unified character across the neighbourhood for example through the use of similar materials, colour palettes or form avoiding exact copies of buildings." 4.7 Despite the site forming part of the Romford Strategic Development (RSDA) and being identified as part of the Local Plan evidence base, the Site was never formally allocated for residential development in the adopted Local Plan (2021). 4.8 Gasworks sites are known to have site-specific development constraints, as recognised within the London Plan (2021), including contamination which can require extensive enabling and Quod | Romford Gasworks | Romford Town Centre Masterplan SPD | November 2024 10 remediation work, on-site gas infrastructure and the requirement for acoustic mitigation. These constraints often stymie redevelopment of such sites, often more so for residential than for non-residential development. 4.9 It should be noted that a substantial proportion of the 'Illustrative Masterplan layout' for the site, as shown in Figure 136 of the SPD, straddles land outside of Berkeley's ownership as well as across Cadent's Pressure Reduction Station (PRS), other items of gas infrastructure that has associated easements, and no build zones covered by the Planning Advice for Developments near Hazardous Installations (PADHI+) Zones (Health and Safety Executive's (HSE's) advice service). 4.10 Given the site constraints and the exceptional costs associated with the site enabling and remediation works, this would drive the need for high density development on viability grounds when considering residential development. It is our opinion at this stage that the quantum and heights identified within the SPD's proposal for the Site are not deliverable or viable given the proposed scale and storey heights as indicatively shown within the SPD (Page 197 - Figure 141: Illustrative massing strategy; Page 94 - Figure 53: Height Strategy). 4.11 Further, Figure 136 also states "Single ownership allows for rational division of blocks", however it should be noted that the Illustrative Masterplan for Crow Lane within the SPD covers three different land ownerships – St William Homes LLP (Berkeley), National Grid Twenty Seven Limited, and Cadent Gas Ltd. This is a significant delivery constraint to the SPD's masterplan proposal for Crow Lane. 4.12 Berkeley's illustrative proposals for the Romford Gasworks site, set out within Section 5 of this statement, only incorporates land within their own landholding, shown in Red on the Ownership Plan in Figure 4.1 below. Figure 4.1 – Romford Ownership Plan 4.13 Berkeley requests that the Vision for the Site is amended, in line with these representations, to promote a proposal for Industrial & Logistics, employment generating floorspace, including the potential relocation of Romford London Ambulance Station to the Site. 4.14 Further details of this proposal are set out within Section 5 of this statement. Part 6.11.3.5 Implementation, page 196 4.39 Further to paragraph 4.12 and 4.13 of these representations, the SPD's masterplan for the Crow Lane site includes three separate landownerships – St William Homes LLP (Berkeley), National Grid Twenty Seven Limited, and Cadent Gas Ltd. This is a significant delivery constraint to the SPD's masterplan proposal for Crow Lane. 4.40 The first sentence of part 6.11.3.5 Implementation within the SPD states: "Crow Lane area is currently under single ownership which provides a unique opportunity for

a rational layout with new routes that effectively link into the wider context.”. This statement needs to be revised, and Berkeley OBJECT to this statement within the SPD. 4.41 Berkeley’s illustrative proposals for the Romford Gasworks site, set out within Section 5 of this statement, only incorporates land within their own landholding. Quod | Romford Gasworks | Romford Town Centre Masterplan SPD | November 2024 14 4.42 The Crow Lane proposals within the SPD straddles land outside of Berkeley’s ownership as well as across Cadent’s Pressure Reduction Station (PRS), other items of gas infrastructure that has associated easements, and no build zones covered by the Planning Advice for Developments near Hazardous Installations (PADHI+) Zones (Health and Safety Executive’s (HSE’s) advice service). 4.43 Given the site constraints and the exceptional costs associated with the site enabling and remediation works, this would drive the need for high density development on viability grounds when considering residential development. It is our opinion at this stage that the quantum and heights identified within the SPD’s proposal for the Site are not deliverable or viable given the proposed scale and storey heights as indicatively shown within the SPD (Page 197 - Figure 141: Illustrative massing strategy; Page 94 - Figure 53: Height Strategy). 4.44 There are no insurmountable technical constraints or environmental issues that would prevent I&L development. Where there may be technical or environmental implications, these are capable of being mitigated as part of any future planning application. 4.45 The proposal to intensify and continue an industrial use in this location should be viewed favourably, particularly given the poor aesthetic condition of the Site. Without the proposal for employment generating uses on the site, the site will remain underutilised and vacant or in open storage use, which serves no benefit to Havering or the local residents. 4.46 There is strong market interest for the Site to be brought forward for I&L use, and the proposal should be supported to ensure Implementation of an economically viable scheme can be achieved on the Site. 4.47 Berkeley therefore request that Part 6.11.3.5 is reconsidered to reflect the illustrative proposal for the Site as set out within Section 5. 5 Industrial Use on The Site 5.1 The site is a 10.7 acre (4.3 hectare) disused former gasholder site. Historically the site has always been in employment use and is still recognised as non-designated employment land. 5.2 The Site also benefits from a 3-year temporary planning consent for open storage (class B8) which expires on 30th April 2026. The temporary proposal in the intervening period - until planning permission is granted for the long-term redevelopment of the site - brings a vacant brownfield site into temporary use and supports job creation and the economic function of the borough and wider area. This recognition that the Site can generate jobs and contribute to the economic function of the borough is a key consideration moving forward. 5.3 The Site represents a good opportunity for Industrial & Logistics (B2/B8/E(g)(iii)) development, and any potential constraints can be discussed and overcome ahead of any planning application submission. 5.4 The Site is located adjacent to a LSIS (the Royal Mail site), and therefore we’d argue the principle of the development for new industrial buildings within this location is acceptable. The Site presents an opportunity to provide best in class units that can meet the operational needs of London’s Industrial & Logistics market, discussed further within Section 6 of this letter. 5.5 There are no insurmountable technical constraints or environmental issues that would prevent I&L development. Where there may be technical or environmental implications, these are capable of being mitigated as part of any future planning application. 5.6 Policy 26 (Urban Design) seeks a high quality of design which, amongst other things, are informed by, respect and complement the distinctive qualities, identity and the character of the local area. We consider that this policy aspiration can be achieved through the delivery of high-quality industrial warehouse units, which given the surrounding context are considered more suitable to the site than tall, high-density, residential buildings. 5.7 Industrial and logistics buildings are often preferable in terms of height, bulk and massing due to several key factors relating to their design and overall low impact on their surroundings. Such buildings are low-rise structures, typically two or three stories high. This lower height minimises their visual impact on the skyline and surrounding receptors, making them less imposing and more harmonious within low-density areas, such as the surrounding area of the Site. 5.8 The footprint of I&L buildings allows for substantial internal space without needing to build upwards, which results in more horizontal massing allowing development to integrate well with the site’s neighbouring uses (i.e. Royal Mail). Since I&L buildings maximise floorspace horizontally, they use land more efficiently which reduces the need for multiple high-rise buildings, which residential development often requires. 5.9 Any future development will be designed to benefit

from best-in-class logistics design and functionality – with high quality finishes alongside the inclusion of strong landscaped buffers to protect adjacent residential properties. In terms of overall design, the proposals as part of any Quod | Romford Gasworks | Romford Town Centre Masterplan SPD | November 2024 16 future planning application can aspire to achieve sustainable, high-quality design in line with national and local policy. 5.10 Appropriate consideration will need to be given to the layout of the Scheme, noting the closest noise sensitive receptors are the residential properties located to the east of the Site. The impact of any industrial development on the residential to the east can be mitigated through good design. 5.11 The Site is well suited to accommodate a B2/B8/E(g)(iii) redevelopment, being located in a well-established location, and has the potential for a lower trip-rate use than if the Site were to come forward as residential use. The parking and access strategy would form an integral part of any future scheme and consideration will be given to the proximity and function of the adjacent Royal Mail site. 5.12 The proposed employment use will not result in an unacceptable impact, and the Site is considered capable of being appropriately accommodated within the existing infrastructure of the area, subject to any mitigation which can be addressed through any future planning consent. This is particularly the case when compared to a residential-led development proposal which may place more strain on the local infrastructure with a high population density. 5.13 The Site represents a sustainable location to meet employment needs and will bring forward a broad range of associated benefits upon its delivery, including employment generating floorspace. 5.14 Berkeley have previously written to LB Havering regarding the discussions held to date with the London Ambulance Service. We set this out again for clarity. 5.15 Through discussions with the London Ambulance Service (“LAS”), it has become clear that whilst the existing Romford Ambulance Centre is not surplus to requirements and is a key emergency healthcare facility, it is too small (c.0.75 acres), outdated and is unsuitable for its current and future purpose. A new, larger and future-proofed facility, in close proximity to Queens Hospital, is required and the Romford Gasworks site provides an ideal opportunity to facilitate this. 5.16 LAS have identified that there are very few suitable sites that have been identified within the last 24-months with the Romford Gasworks site “being the one exception ... where it is feasible for a suitably sized site to be developed to meet the current and future needs of the Service”. The LAS strongly supports the redevelopment of part of the Romford Gasworks site to accommodate a new ambulance station facility. 5.17 Importantly, relocating the ambulance centre to the Romford Gasworks helps to unlock the Council’s own regeneration scheme at Bridge Close and may help accelerate its delivery, particularly as it could expedite the pre-Compulsory Purchase Order discussions that the Council is having with the LAS, which could become protracted as evidenced by the LAS’s holding objection on the current Bridge Close planning application. 5.18 Figure 5.1 below shows an Illustrative proposal for the Site, showing Industrial land use and the relocated Romford London Ambulance Station sitting harmoniously together. Please note that this is shown for indicative purposes only and is subject to further design and discussion. The Illustrative proposal for the Site could achieve the following quantum: Table 5.1 – Illustrative proposal: Estimated Quantum of Development Land Quantum Site Boundary 10.7 acres Ambulance Land Take 2 acres Industrial Land Take 8.7 acres 5.20 The indicative proposal shown above could generate c. 300 full-time equivalent (FTE) jobs<sup>2</sup>, providing excellent employment opportunities for the Borough, as well as wider economic benefits, Section 106 contributions to the Borough, and a significant Mayoral Community Infrastructure Levy payment. This is separate to the new jobs that would be created from the new larger ambulance facility on the site. 6 Industrial Intensification and the Need for Employment Land NPPF (2023) 6.1 On 19 December 2023, the updated NPPF was published, replacing the revised versions from July 2021 and September 2023. The updates predominantly focused on Local Plan preparation, housing land supply and delivery, additional Greenbelt guidance and support for alternative types of housing. The key policies of relevance to the Site have remained unchanged and are set out below. 6.2 Section 6 of the NPPF (Building strong, competitive economy) stated that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development (paragraph 85) and stated that planning decisions should recognise and address the specific locational requirements of different sectors, including for storage and distribution sectors (Paragraph 87). The Government’s Practice Guidance also gave specific encouragement to make provision for logistics as follows<sup>3</sup>: “How can

authorities assess need and allocate space for logistics? The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land). Strategic facilities serving national or regional markets are likely to require significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to appropriately skilled local labour. Where a need for such facilities may exist, strategic policy-making authorities should collaborate with other authorities, infrastructure providers and other interests to identify the scale of need across the relevant market areas.....”

6.3 The principle of the development also gains strong support at a national level from the NPPF, Paragraph 8 sets out the economic objective to “help build a strong, responsive and competitive economy” and Paragraph 11 of the NPPF sets out that for decision-taking, development proposals that accord with an up-to-date development plan should be approved without delay. Paragraph 38 sets out that Local planning authorities should “work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.” NPPF Consultation 2024 3 Paragraph: 031 Reference ID: 2a-031-20190722 Revision date: 22 07 2019 Quod | Romford Gasworks | Romford Town Centre Masterplan SPD | November 2024 19

6.4 The NPPF recently underwent a round of consultation on a number of draft policy updates and supporting text, closing on 24 September 2024. The key proposed changes are as follows: ▪ Paragraph 84 – new wording introduced that clearly sets out that planning policies should identify “appropriate sites for commercial development which meet the needs of a modern economy should be identified, including suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics”; ▪ Paragraph 85b – sets out planning policies and decisions should “allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation”; ▪ Paragraph 85c – introduces a new paragraph that supports “the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience”. 6.5 The proposed NPPF changes indicates a clear direction of travel in showing stronger support for the initiative of growing the economy and opens the door to significant applications based on a needs case. There is also explicit support for Green Belt release for commercial development, which whilst not directly relevant to this Site, indicates that the Government is comfortable placing additional weight to sustainability within industrial developments. London Plan (2021)

6.6 Policy E4 (Land for industry, logistics and services to support London’s economic function) requires a sufficient supply of land to be maintained and enhanced in order to meet current and future demands for industrial and related functions. This policy includes a varied operational requirement, including but not limited to “storage and logistics/distribution (Use Class B8) including ‘last mile’ distribution close to central London (...), consolidation centres and collection points.”

6.7 Policy E7 (Industrial intensification, co-location and substitution) states that development proposals should encourage the intensification of business uses in Use Classes E(g)(iii) (formerly B1c), B2 and B8 through the introduction of small units and a more efficient use of land through higher plot ratios and having regard to operational yard space requirements.

6.8 Policy D1 (London’s form, character and capacity for growth) encourages a design-led approach to development based on an understanding of the context of the site and its surroundings.

6.9 Policy D3 (Optimising site capacity through the design-led approach) states that development should optimise the capacity of sites and should consider design options to determine the most appropriate form of development that responds to the site’s context. It also states that proposals should deliver appropriate outlook, privacy and amenity.

6.10 Policy GG5 (Growing a good economy) seeks to promote and strengthen London’s economy and supports economic development and regeneration.

6.11 Policy GG6 (Increasing efficiency and resilience) requires developments to increase London’s efficiency and resilience. Quod | Romford Gasworks | Romford Town Centre Masterplan SPD | November 2024 20

LBH Local Plan (2021)

6.12 Policy 19 (Business Growth) supports proposals which improve the physical appearance, attractiveness and competitiveness of employment areas (criteria vi). Therefore, a proposal to intensify and continue an industrial use in this location is likely to be viewed favourably, particularly given the poor aesthetic condition of the Site. The policy also encourages



and promotes supporting the strategic growth potential of the Borough in logistics activities of greater than sub-regional importance, as set out in the London Plan (criteria xi). 6.13 The supporting text to Policy 19 details that LB Havering is identified in the London Plan as suitable to be developed as a Strategic Outer London Development Centre (SOLDC) as it has a strategic significant growth potential in logistics activities of greater than sub-regional importance. SOLDCs are business locations “with specialist strengths which potentially or already function above the sub-regional level and generate growth significantly above the long term outer London trend”. This highlights the strengths of Havering as host to strategically significant logistics activities, both now and in the future. 6.14 As set out above, Policy 20 (Loss of locally significant industrial sites and non-designated land) generally seeks to maintain or enhance the employment potential of non-designated employment land. Policy 20 states that the Council will only support the loss of non-designated industrial land where it can be demonstrated that: i. The change of use from industrial employment uses will not lower the industrial capacity of the borough below that necessary to meet projected demand over the planning period as estimated by the most up to date Havering Employment Land Review. ii. There is no market interest in the site following one year of continuous active marketing. 6.15 Specifically on point ii), there has been strong interest in the site, and Berkeley remain in discussions with interested parties. This would therefore be a conflict with Policy 20 part ii), and we therefore consider that LB Havering should not release this non-designated employment land site which has significant market interest at this time. 7 Industrial & Logistics In and Around London 7.1 London generally and Havering in particular are under pressure to re-provide Industrial & Logistics (I&L) supply which is being lost across the capital. 7.2 Redevelopment of Romford Gasworks could be seen to respond to the loss and spill over relocation of I&L uses identified in London Industrial Land Supply Study, and growing demand pressure identified by London Industrial Land Demand Study. 7.3 The areas in Outer London (like Havering) play an increasing role in servicing the London economy due to higher availability of land. There is a limit to how far the industrial activity could spill over. 7.4 A substantial part of the stock is in wider industrial or ‘sui generis’ use that, while not necessarily being a core industrial activity, is industrial related in nature and hence an important element to service the economy. 7.5 The Havering Local Plan seeking a net release of industrial land will exacerbate capacity shortages. 7.6 Both core and wider industrial uses play a crucial role in meeting demand for industrial use. These could include E(g)(iii), B2, B8 and sui generis use classes. Wider industrial land comprises a significant share of industrial capacity both in Havering and across the capital. 7.7 London Industrial Land Supply Study 2020: Executive Summary (January 2023) - Page 8 advises that ‘There is an estimated 736 ha of land in industrial and related uses in the planning pipeline that could potentially change to non-industrial use, the majority of which is in Inner London (54%) and the East sub-region (45%)’ and page 22 advises that industrial property market trends are changing, increasing need for large floorplate space in Outer-London: “There is significant growth in demand for big box, distribution stock fuelled by changing consumer habits and the growth of e-commerce. This has focused on key locations with good access to the strategic road network including Ealing, Barking and Dagenham and Enfield. The strength in demand for stock of this nature, relative to the existing undersupply has been a significant factor driving increased industrial rents, capital values and land values across London. This is reflected in the premium seen in rental and capital value terms for stock over 100k sqft in these areas suitable for logistics, going against the general trend that larger stock tends to see reduced value on a £/sqft basis. As the strength in demand is set to continue, a growing development pipeline for big box stock and continued upward pressure on rents and values are likely. This demand is expected to be supplemented by a growing market for non-traditional B-class uses including Film and TV production / post-production with similar requirements for large floorplate space in Outer-London.” 7.8 Strong support for employment development can also be found in the development plan (London Plan E4; HLP Policy 19 and Policy 20) and NPPF (section 6). Quod | Romford Gasworks | Romford Town Centre Masterplan SPD | November 2024 22 The Economy of the Logistics Sector 7.9 The wider logistics sector is essential to powering economic growth, enhancing productivity and supporting the Government to deliver its vision for a decade of the national renewal. The sector contributes £232 billion of GVA a year to the economy and supports 2.7 million high quality jobs in England alone: paying on average almost £5,000 a year above the national average<sup>4</sup>. 7.10 ‘Proposed reforms to

the National Planning Policy Framework and other changes to the planning system' (July 2024) states in Chapter 7 Paragraph 3: "d. Freight and Logistics: this sector is fundamental [Quod emphasis] to the UK's economic growth and productivity, contributing £84.9 billion in Gross Value Added each year and employing nearly 1.2 million people. The freight and logistics sector depends upon a national network of storage and distribution infrastructure to enable local, regional, national and international operations". 7.11 Given the importance the Government is clearly placing on the industrial and logistics property sector, we believe that the Romford Gasworks site has a vital role to play in the London and wider UK economy. London Borough of Havering Employment Land Review – Final Report (May 2024) 7.12 LBH commissioned AECOM to undertake an Employment Land Review (ELR) which sets out a detailed evidence base on which an appropriate supply and mix of employment land and premises can be planned for, and provides a strategy for balancing supply and demand. This report was published in May 2024, and forms part of the evidence base for the Local Plan Update. 7.13 Within Paragraph 1.7.6 of the ELR, there is a forecasted requirement for an additional 64,190 sqm of industrial land and floorspace (Use Classes E(g)(iii), B2 and B8) over the new Local Plan period to 2041. The Romford Gasworks site within Berkeley's ownership has the capacity to make a significant contribution to this amount of floorspace. 7.14 Paragraph 1.9.8 states that the forecasts for industrial land use requirements show that there is projected to be a gross increase in demand in the period 2023-2031 of approximately 9.9ha, driven by an increase in industrial jobs [930 jobs], the vast majority of which are in use class B8 jobs. The proposals for the Romford Gasworks site can make a significant contribution to this demand by providing an estimated 300 FTE jobs across the 4.3ha site. 7.15 The 'Recommendations' set out within Section 1 of the ELR clearly states that Havering should: [R6] "...monitor changes of industrial employment land through planning permissions to ensure that sufficient land is available for economic growth over the Local Plan period and/or monitor how employment land is performing against the objectives of the Local Plan". The Romford 4 British Property Federation: BPF Logistic Property Board 'Calling Card' Quod | Romford Gasworks | Romford Town Centre Masterplan SPD | November 2024 23 Gasworks site is available in the short to medium term to contribute to Havering's economic growth. 7.16 Section 6.3 Light Industrial market – [E(g)(iii)] of the ELR, figure 6-4 shows vacancy and availability rates over the past 5 years, with the two rates both at c.3% in 2022. 7.17 Within Section 6.4 Industrial market – [B2] of the ELR, figure 6-7 shows that the vacancy and availability rates for Havering over the past 5 years, with the two rates decreasing from 2021 to c.4% for Availability Rates and c.2% for Vacancy Rates. 7.18 Section 6.5 Warehousing market – [B8] of the ELR, figure 6-10 shows the vacancy and availability rates over the past 5 years, with availability rates increasing to c.5%, whilst vacancy rates have decreased to c.1%. 7.19 Lower vacancy rates of industrial premises typically indicate high demand because they show that more businesses are occupying available space rather than leaving them empty. Overall, low vacancy rates in industrial floorspace signal that businesses actively seek these premises, underscoring demand in the market. 7.20 We would therefore conclude that Section 6.4 and 6.5 of the ELR provide support for B2 and B8 development within Havering due to low vacancy rates, indicating uptake in floorspace. 7.21 Looking at Future Supply (Section 7.6), Table 7-5 presents the findings of a review of the Planning London Datahub which identifies the pipeline of employment land development within Havering. Of note, there is an anticipated loss of B8 floorspace totalling -6,412.58m<sup>2</sup> (GIA) within the pipeline. The Romford Gasworks site can help mitigate this loss. 7.22 Significantly, Section 9.3 of the ELR sets out the Net requirement for industrial land. Paragraph 9.3.3 states that between 2023 and 2041, the analysis predicts a net requirement of 3.1ha of land for industrial floorspace. The Romford Gasworks site, which is 4.3ha, would make a significant contribution over the net requirements. 8 Conclusion 8.1 Berkeley welcomes the opportunity to input into the Romford Town Centre Masterplan SPD consultation exercise. 8.2 The Romford Gasworks site represents an excellent opportunity for optimisation of a Brownfield, previously developed site. Strong support for employment development can be found in the development plan (not limited to, London Plan E4; HLP Policy 19 and Policy 20) and NPPF (Section 6). 8.3 The Site is able to make a meaningful contribution to employment and economic delivery, to provide new infrastructure and to contribute positively to the wider regeneration coming forward in the local area which is subject to major growth, promoted by the SPD. 8.4 As set out within these representations, there is a strong strategic case of the suitability of this site in the short-to-medium term to

	<p>support future growth in employment floorspace within this area of Havering. 8.5 There are no insurmountable technical constraints or environmental issues that would prevent development, and where there may be technical or environmental implications, these are capable of being mitigated as part of a future planning application. 8.6 Pre-application discussions have taken place with London Borough of Havering's (LBH) Regeneration Team who have also indicated strong support for an employment-led redevelopment. Berkeley have also met with the Leader and Chief Executive of the Council, who have voiced their support, and conversations will continue alongside further formal pre-application meetings with Planning Officers in due course. 8.7 We consider that the GLA is likely to be supportive of our proposal given it aligns with the London Plan policies regarding industrial intensification and protection – insuring London has adequate stock of land appropriate for Industrial and Logistics development, which this site can deliver. 8.8 We consider that the proposal for Romford Gasworks should be reviewed holistically in the context of not only helping to unlock and accelerate housing delivery at Bridge Close (c.1,000 units) but also helping to deliver best in class I&amp;L use and a key piece of local infrastructure that is critical for the local and surrounding community, whilst also creating a significant number of new jobs. 8.9 The alternative to the proposal is that the site remains underutilised and vacant / in open storage use for the foreseeable future which clearly serves no benefit to Havering or residents. 8.10 The principle of commercial terms has been agreed with the LAS and Berkeley is seeking to reach a similar agreement with an industrial party. Thereafter, Berkeley would seek to commence preparing a planning application to facilitate a start on site date as early as possible. This may assist in accelerating the Council's own programme for delivery. Quod   Romford Gasworks   Romford Town Centre Masterplan SPD   November 2024 25 8.11 The Site is an appropriate and sustainable location for employment purposes, having regard to the policies and guidance of Government Planning Policy (NPPF and NPPG), the London Plan (2021), the Havering Local Plan (2021), and the London Borough of Havering Employment Land Review - Final Report (2024). The proposed employment use will not result in an unacceptable impact in relation to any environmental interests of relevance, and the Site is capable of being appropriately accommodated within the existing infrastructure of the area, subject to any mitigation which can be addressed through any future planning consent. 8.12 The Site represents a sustainable location to meet employment needs and will bring forward a broad range of associated benefits upon its delivery, including a substantial quantum of employment generating floorspace – an economic benefit to the Borough. 8.13 On behalf of Berkeley, Quod reserve the right to add to or amend their representations. This may be required where the Council issues new guidance or there is a change in policy at a local, regional or national level. 8.14 Berkeley looks forward to continuing to work with the Council and other stakeholders as it develops its Romford Town Centre Masterplan SPD and would welcome the opportunity to discussing the Site proposals with you further in due course. Please do not hesitate to contact us if you have any questions.</p>	
<p>Met Police Designing Out Crime Officer</p>	<p>Thank you for allowing us to comment on the Romford Masterplan. I currently work in the Metropolitan Police Service (MPS) as a Designing out Crime Officer (DOCO). Our unit administers the MOPAC 'Secured by Design' (SBD) scheme. Our team currently work in the North East London quartile, of which Havering is one of the 9 London boroughs that we cover. Please take this response as that of the MPS. Designing out Crime Officers are police specialists, trained to reduce the risk of crime through environmental and architectural design. We work in partnership with local authorities, developers, architects, other Police colleagues, such as Counter terrorism advisors (CTSAs) and communities to ensure that new developments and existing spaces are designed to discourage criminal behaviour. SBD is a police approved certification scheme that improves the security of homes, schools, businesses, and public spaces. It provides a framework for implementing design strategies and accredited products that reduce the opportunity for crime. The scheme covers areas like building layout, access points, lighting, CCTV and landscaping. By engaging with DOCO's early in the planning process, developers and communities can create safer environments that are resistant to crime. These efforts not only deter criminal behaviour, but also increase the sense of safety, promote community engagement, and improve the overall quality of life. The unit works with (and not in opposition of) local authorities to help provide the level of housing / commercial buildings required, whilst still achieving a good level of security design. The design and layout of the physical environment and physical building security is key to creating safe environments and reducing crime and disorder.</p>	<p>We welcome the response highlighting improvements to safety and security with Secured by Design and the Secured by Design scheme. Amendments have been made to further highlight inclusivity and safety, with further clarification in section 5.5. The Council welcomes</p>

<p>SBD accreditation on developments will (and is proven to) reduce crime and its fear for residents and business with up to 75% decreased chance of being burgled and a 25% reduction in criminal damage. The scheme is also successful at reducing anti-social behaviour through a raft of measures including: robust communal door standards; access control; and careful design/layout of new homes. Projected estimated savings for Police and Council resources by using SBD on new builds is approximately £1 million a year. This figure is cumulative year on year so the more projects using SBD provides a higher ongoing saving to the Borough. 2 With this in mind, public spaces – such as parks, shopping centres / markets, pedestrian areas and community places, play a critical role in well-being and growth of any town centre. However, their success depends heavily on them being safe, accessible, and welcoming. Safe and well-designed public spaces are essential for healthy, vibrant, and resilient communities. Through thoughtful design, these spaces become more than just physical places - they foster social connections, improve well-being, reduce crime, and promote local economic activity. It is an MPS priority to protect vulnerable people. Good design through the use of the Secured by Design scheme will help those who are more vulnerable. With a population increase of 20% in Romford in the last 20 years, further projected increases and an anticipated target of 5000 new homes and 500 new jobs in Romford, the design of suitably planned locations will be paramount for their welfare and continuing good health. SBD also covers Commercial aspects of design including Shops, Schools, Open Spaces and Places of Worship. As Havering are proposing to regenerate Romford’s Town centre and the market square, introduce new train station entrance and multiple new public spaces, this will bring new challenges and pressures to keep up with the increased footfall and potential crime and anti-social behaviour associated with this. Recent statistics for Romford Town show persistent issues with offences such as violent crime, ASB, vehicle crime and shoplifting. Criminal damage and arson have increased year-on-year by about 5.1% in Romford. While the town’s overall crime rate is slightly below the national average, the volume of recurring incidents continues to place pressure on the police, with around 50 arrests made each month to address offenses like theft, anti-social behaviour and drug related crime. Overall, the trends suggest that while crime is being actively managed, the evolving nature of offences demands ongoing attention from both the MPS and local authorities to prevent escalation and ensure public safety in Romford’s busy urban core. Due consideration should be paid to Section 17 of the Crime and Disorder Act 1998 which places a duty on local authorities to do all they can to reasonably prevent crime and disorder in their area. Embedding Secure by Design principles fits fully with this obligation and the success of the scheme is highlighted later. We have had a chance to review Romford Masterplan document. We are very supportive of what the masterplan is trying to achieve for residents and businesses in Havering. We would like to make the following representations in order to improve Romford’s safety through environmental design and the Secured by Design scheme. This can be included in to existing sections or creating a new section, for example “Crime Prevention Section”.</p> <p>Section 5.2; Space &amp; Landscape: This refers to Lighting (page 48), it is recommended that all public spaces achieve the latest standard of BS 5489. There are concerns that an over-prevalence of low-level aesthetic uplighting may result in creating a higher risk of crime and ASB and are likely to increase the fear of crime. The Institute of Lighting Professionals have a range of guides that advise on balancing best security whilst also meeting other requirements such as avoiding disturbance to residents or local wildlife. Section 5.3; Movement &amp; Connectivity: This refers to secure generous cycle parking and other cycle infrastructure (pages 62) it is important to ensure that our unit is consulted so that site specific requirements are met and can reach a compromise with London Cycle Design Standard (LCDS) Guidance where there is perceived conflict but both objectives can be delivered. By signposting to MPS DOCOs, we are also able to promote safer streets and public realm improvements throughout the Borough by liaising with the Metropolitan Police Counter Terrorism Security Advisors (CTSAs), Traffic Management Unit (TMU) and with the British Transport Police (BTP). The addition of CTSAs, TMU and BTP consultation is to ensure that experts in these specific areas are consulted at the earliest opportunity to ensure appropriate, cost-effective and proportionate measures are introduced to protect users of the spaces. Planners and designers would benefit from this expertise, through one MPS voice via the DOCO as the single point of contact. My colleagues and I strive to ensure that new developments across London reach the highest possible security standards, mainly through partnership working with the relevant</p>	<p>working with the Metropolitan Police on these issues as development is brought forth within Romford.</p>
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	<p>Planning Departments and requesting conditions to comply with Secured by Design. We would also ask that we are and remain involved in the Romford Masterplan and Havering Re-generation work in order to help promote safe and secure design for the borough of Havering. Thank you again for seeking our opinion in relation to this important document. If you require any clarification of any of the comments made, please do not hesitate to contact me. "SBD Planning Condition: Applying an SBD Planning condition to ensure SBD accreditation, should be paramount and form part of planning of any new development, town centres, public spaces, transport hubs and streets. This will ensure compliance from architects and developers to provide residents and business with safe and sustainable buildings and public spaces to live and work in. Section 7.2; Partnership Working: We also believe Designing out Crime Officers and the Secured by Design scheme should be mentioned in section 7.2. We would like any architect / designer of new buildings or public spaces to be signposted to Designing Out Crime Officers at the appropriate RIBA stage. Abbreviations and Glossary (page 222): It is vital that MPS Designing out Crime Officers (DOCOs) and Secured by Design (SBD) are included to ensure that there is no confusion as to what these roles are and how to contact us. Our Services are free. Our unit would be willing to help write these if required, but more information can be found at <a href="http://www.securedbydesign.com">www.securedbydesign.com</a>."</p>	
<p>Havering Cyclists and Better Streets</p>	<p>"2.2.6 Landscape and public realm We are pleased that the section recognises the subjective safety issues of subways for walking and the barrier the ring road creates as presented in Figure O6. However, the barriers to cycling is completely missed here and there is no reference to the routes into the town centre which we think need to be included. 4.3.1 Space and Landscape Objectives We think that where Objective SL1 refers to "encourage walking and cycling", this should be strengthened to "enable walking and cycling". 5.2.2.1 Green Strategy We are especially pleased to see the reference to families and children without cars needing connections to the town centre, but this doesn't really seem to have been formed in more detail in the strategy. We would welcome far more being made of this important issue." . "2.1.2 Connectivity This section fails to provide comment on local connectivity by active modes, which despite the significant issues, still remain possible and desirable in some parts of the town. 2.4.1 Opportunities for change This section could be strengthened with the potential create permeability for walking and cycling and public transport interchange in the town. 4.2.1 – Masterplan key moves We are pleased to see the key moves around re-characterising the ring road and providing active travel corridors and crossings. We are highly supportive of Market Place becoming car-free, but we would like to see reference made to it positively being remaining fully accessible for cycling. 5.3.2.8 Ring road While the ring road has removed traffic from much of the town centre core, we think the masterplan should also recognise that the A12 is there for long distance strategic east-west motor trip and as a result, far more should be made of the A118 corridor for mixed modes and especially cycling given the lack of direct alternatives. 5.3.2.6 Roundabouts Figure 37 mentions the liveable neighbourhood proposals. Given the age of the project and how there has been scant delivery so far, we think the masterplan should point towards this project being comprehensively review and updated in the light of the masterplan. 5.3.2.1 Walking and cycling This section refers to encouraging again. It needs to be stronger around enabling and prioritising sustainable modes. 5.3.2.9 Ring road characterisation We broadly support the characterisation, however the need to enable people to walk and cycling along and across the north and west sections needs to be strengthened. 5.3.1 Overview This section makes reference to making walking and cycling more attractive. This needs stronger language around enabling people to walk and cycling. 4.3.2 Movement and Connectivity Objectives We think this section needs to go beyond "promoting" public transport and active modes. This should be objectively "enabling and prioritising" public transport and active moves. We think the language in MC8 to "promote" active travel needs strengthening to "enable and prioritise". 4.3.3 Sustainability We think the language in Objective S7 to "promote" active travel needs strengthening to "enable and prioritise".4.3.6 Uses and Mix 4.3.7 The Economy As with section 4.3.6. We would like to see reference made here for uses and mixes which support and are supported by sustainable transport and which also reduce need to travel. 6.2.2.3, 6.7.3.3 &amp; 6.8.3.3, 6.10.3.3 We think the potential for cycling into Market Place needs to be included from the northeast. The idea of a "dedicated cycle lane" on Main Road needs to be strengthened to protected cycle space. The idea of a "dedicated cycle lane" on Western Road also needs to be strengthened to provide the same. 6.9.3.3 The idea of</p>	<p>Response welcomed. The Masterplan considers the Town Centre as a whole and specific sites are highlighted. The detailed design and implementation of cycle and wheeled access (of non-motorised use) is to be addressed further as applications come forward, inline with Council policy and TfL requirements.</p>

	<p>a “dedicated cycle lane” on North Street needs to be strengthened to protected cycle space. 6.11.3.3 The idea of a “dedicated cycle lane” on Crow Lane, Oldchurch Road and Dagenham Road needs to be strengthened to protected cycle space. Nursery Walk would benefit from public realm and access enhancement, but it is traffic-free and does not especially require a dedicated cycle lane. “We agree that a masterplan is needed for Romford and adopting it as a Supplementary Planning Document (SPD) is a good approach in order to guide development and lever investment for improvements. We think that as part of taking this forward, there needs to be reference to member and officer capacity and capability building to ensure there is corporate alignment with delivery on the ground. Overall, we are supportive of the “Final Consultation Draft, 22nd August 2024” which represents a detailed, coherent and integrated plan for the town. We do, however, have some comments as set out below. In many cases, our comments are around language, although we think there needs to be a proper glossary of agreed terms so that when in use, all making use of the document are clear on what terms mean. For example, the legally correct term “footway” should be used rather than “pavement”. For cycling, we would prefer to see the legally correct term “cycle track” used rather than “segregated cycle lane” which is open to too much interpretation. 7.4.5 Infrastructure projects Table 34 raises significant concern because there are lots of unknowns and uncertainties around the delivery of active travel projects which is a worry from a masterplan deliverability perspective. There is also several references to toucan crossings which from an accessibility perspective are a very poor form of crossing type.”</p>	
GLA	<p>Vision 1.14 Strongly supportive of the infrastructure-led/ public realm focused approach for delivering growth in the Opportunity Area. The key moves of rejuvenating The Market Place, opening up the River Rom, and overall improvement of public realm and connectivity would support Romford in realising its potential as an opportunity area, making it an attractive and well-designed place to live, play and work. 1.15 Welcome the vision for Romford as expressed under paragraph 4.1, which promotes a refined retail offer, focus on maintaining and improving Romford as a leisure destination, provision of early evening economy, residential growth and social infrastructure (including schools and health facilities). Officers suggest there could be a reference added to signpost improved green and blue networks, and access. 1.16 Supportive of the overarching landscaping strategy and well-considered individual strategies for key spaces. Consider night time accessibility of the routes, e.g. if parks close and have secure/safe paths and lighting. Green and blue infrastructure 1.36 Welcome the ring road approach that identifies a wide range of opportunities to create a safer, more equitable and attractive streetscape in line with the London Plan Policies: G1 Green infrastructure, G4 Open space, D8 Public Realm, and the Healthy Streets Approach. 1.37 The green corridor approach is innovative as it encourages a shift away from using the hard infrastructure network to perceive and intervene in Romford. Using the green infrastructure as a guide for the urban form creates a stronger identity and promotes place-based strategies that are anchored in ecological continuity. 1.38 GLA officers would welcome more development of the enhanced amenities that could be provided along River Rom and Black’s Brook. This could involve incidental play opportunities, as well as pedestrian and cycling paths, and nature based SuDs. Site specific comments (please see appendix for more detailed comments on sites) 1.29 GLA officers are supportive of the de-prioritisation of car-use/car-parks and car-free proposals to prioritise pedestrian use and active travel access in The Market Place, Mercury and Rom Valley guidance as this contributes towards the Good Growth Objective 3 (GG3) and the Mayor’s net-zero target ambitions. 1.30 In relation to the Liberty site brief, GLA officers are keen to know whether the “potential intimate space behind the Bull Pub” shown in Fig. 106 is a public open space and would recommend reference being made to the alignment of proposed public open spaces like this one to the Policy D8 Public Realm and you can refer to the GLA design guide Expanding London’s Public Realm and Public London Charter. An ‘illustrative view point’ of this space could also be of benefit in the masterplan. 1.31 GLA officers note the interest in Romford Market and welcome the desire to improve frontages and provide spaces for events and formal/informal gatherings. Officers would welcome a development of site-specific guidance on Market Place, outlining the character of the developments the council wants to see around the Market, how the proposed buildings should interact with the surrounding public realm, and how the Market can support more flexible uses, supporting new traders and testing new types of activities. Heights 1.21 It is recognised that LB Havering Local Plan does not currently fulfil the requirements of Development</p>	<p>Response welcomed. Changes made to the Masterplan were corrective, to add clarity, alter or refresh references, refine terminology, and add further emphasis. Corrective changes were made to respond to outdated information, or grammatical refinement along with an update of the implementation table. There has been an expansion of reference to safety and a new objective to consider the specific safety of girls and women. The job forecast has been amended. The Masterplan addresses the issue of building heights effectively by</p>

<p>Plans with respect to LP Policy D9. Paragraph 6.1.32 of the Local Plan commits to developing a Masterplan for Romford '...to support a local height definition for tall buildings and the identification of appropriate locations'. 1.22 It is noted that Havering's Character Study (2024) identifies Romford Town Centre as an appropriate area for transformational change and regeneration. It defines tall buildings within Havering as those which are 6 storeys and above and identifies the town centre as a potential location for tall buildings to support a local economy and investment. 1.23 The SPD should make it explicitly clear that it can only provide guidance supplementary to Development Plan policy and as such tall building parameters such as tall building definitions (if different from the London Plan), locations that may be suitable for tall buildings and appropriate tall building heights cannot be established in an SPD and should be set out in a DPD. LBH should consider how this document relates to the local plan review to secure DPD status. This is necessary to be consistent with Policy D9B2 and 3 of the London Plan. The parameters set out in the SPD are guidance and the identification of locations and setting of appropriate heights should be appropriately caveated until this can be progressed through a DPD. 1.24 Together with the character study, the masterplan forms an evidence base on tall buildings that will need to inform a suitable policy to cover the tall buildings approach in the forthcoming Local Plan, which we understand is currently in progress. 1.25 In the meantime, the description of some anticipated heights in development opportunity areas could be useful to guide placemaking. As London Plan Policy D3 states change is a fundamental characteristic of London, and as such respecting character and accommodating change should not be seen as mutually exclusive. The masterplan does well to clearly set out the historic to current townscape context, baseline building heights and outlining future taller buildings expected in Romford i.e predominantly low-rise buildings of 2-6 storeys in the town centre, 2-3 storey housing with newer developments of 3-16 storeys emerging in the development pipeline. However, the current height strategy in the masterplan does not seem ambitious enough to realise the growth potential of the area, given the role of Romford as a metropolitan town centre and Opportunity Area and the high accessibility levels offered by the Elizabeth Line station/ line. 1.26 Considering that the efficient use of land requires optimisation of density, GLA officers would encourage the masterplan to be more ambitious in terms of height and density around the key sites and areas close to the station. There is an opportunity for high densification (eg 6-7 storeys rather than 3-4) in sites, subject to any heritage impact being considered. 1.27 GLA officers support the illustrative spatial locations introducing tall buildings of up to 16 storeys within close proximity or adjacent to a major transport line i.e the railway line and main roads including Waterloo Road, Rom Valley Way and Crow Lane Road - all connecting to the ring road. It is also important that developments including tall buildings are assessed in accordance with LP policy D9 requirements. 1.28 The wording around taller buildings currently reads very cautious/prohibitive. GLA officers would encourage the masterplan to adopt a more positive approach/ language. There is a strong link between the ability to create generous, high quality new public realm and the need for development to be of sufficient densities to deliver these public benefits. The masterplan should acknowledge and reflect on what this could mean for some sites, and the deliverability of the masterplan. For example, de culverting of the river Rom (an aspiration of the masterplan) is expected to have a high cost which will require a certain scale of development (and affordable housing) to make it deliverable. Approach to site capacities 1.17 Welcome the pragmatic approach to dwelling mix that is encouraged when designing major general needs housing schemes in the area, including maximising the amount of family-sized homes, and in particular the reference to duplex typologies and the requirement for adequate outdoor spaces. The masterplan does well to reference and consider London Plan Policy SD6 and SD7 in relation to town centre focus on housing development. 1.18 The site guidance overview identifies ten key sites across Romford Town Centre: North Street, St Edward Way, Market Place, Civic Campus, Brewery, Liberty, Mercury, Station Gateway, Crow Lane, Rom Valley. The development principles for each site are explained through a series of themes (land use, open space, access and movement, character and townscape, implementation). 1.19 Where massing for new development is proposed, this takes into account the guidance set out in the GLA Optimising Site Capacity Guidance London Plan Guidance (LPG) 2024. However, GLA officers would be keen to understand in greater detail the assumptions followed across the sites, including whether the GLA typology toolkit was applied, the proposed tenure mix, and the method/ assumptions used to calculate jobs. 1.20 It is mentioned that the masterplan is viability and market</p>	<p>acknowledging the existing heights, the height of approved developments and the surrounding context along with the historical townscape. The Market Place has been considered within the Site Guidance. The SDA boundary in the Romford Masterplan SPD is correct but the Havering Local Plan Figure 2 is incorrect. The boundary as used within the Masterplan is the boundary that was consulted on in the Havering Local Plan examination and is correctly drawn on the Havering Policies Map. We apologise for this confusion and will be adding an erratum to the Local Plan to clarify this.</p>
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tested. GLA officers would be keen to get a better understanding of the viability assessment. "Economy 1.32 GLA officers welcome the reference to creating a diverse workforce and continued support of emerging smaller flexible workspaces in Romford town centre. 1.33 The Masterplan suggests a higher growth potential in jobs (2,250 – 2,650 new jobs) than the London Plan indicative capacities (500 new jobs by 2041). Officers welcome this aspiration but note that more detail in the type of jobs and the assumptions for calculating non – residential floorspace across the 10 strategic sites would be beneficial. 1.34 GLA officers welcome the reference to the evening and nighttime economy and the aspirations to strengthen the existing offer to respond to needs of increasing population (paragraph 2.3.1.3). Suggest adding a reference to the need for well-designed public spaces (streets, parks, routes to stations) and ground floors uses to provide a safe night-time experience for all, and in particular women, girls and gender diverse people. GLA has launched the Women, Girls and Gender Diverse People: Safety in Public Spaces; a handbook to better support London's public space producers to respond to gender safety in London. 1.35 GLA officers would welcome examples of public realm activation beyond retail focused uses. Social Infrastructure 1.39 Data from Census 2021 suggests that more than 50 per cent of the population in Romford Town Centre was born outside the UK, whilst 20 per cent is under 15 years old. Amongst other key proposals the masterplan proposes a landmark-multipurpose youth club. This is supported. 1.40 GLA officers would be keen to see more detail on how young people are considered in the public spaces and non-residential spaces. 1.41 Relevant case studies could be included to emphasise the opportunity for social and community infrastructure to support culture and identity that responds to the local character, and community demographics, and promote co-creation in line with Policy S1 Developing London's Social Infrastructure. Circular economy 1.42 Welcome the reference to circular economy. GLA officers suggest that a reference could be added to highlight the potential for circular economy to drive innovation, support local jobs and enhance community bonds. For example, 'Repair cafes' or zero waste hubs are examples of how broad sustainability concepts can be applied at neighbourhood scale, allowing people to improve their skills, avoiding waste and building a sense of community." Market Place - Supportive of the use of street and public realm design to enhance safety of the public in the day and nighttime as this is in line Good Growth Objective 1 and 3 plus the Mayor and TfL's Healthy Streets. Recommend referring to the toolkit and framework for more indicators beyond lighting that can be included in the design. GLA's recently launched Women, Girls and Gender Diverse People: Safety in Public Spaces; handbook can also be considered. – The masterplan currently sets the proposed heights at 3-4 storeys. In line with Policy D3 in the London Plan, GLA officers query whether there is opportunity for further intensification (up to 6/7 storeys) to make the best use of land. This could be applied broadly across other sites as well. – Supportive of the car-free proposal to prioritise pedestrian use and active travel access – this contributes towards the Good Growth Objective 3 (GG3) and the Mayor's net-zero target ambitions. Suggest that any comments on the proposal's impact on streets, parking and public transport facilities to be provided by TfL officers. – Welcome the vision to enhance the site's role as a civic centre and welcome the proposal for upper floors to provide residential uses with potential to incorporate some office, commercial and hotel uses as this is in line with delivering Good Growth objectives GG2, GG4 and GG5 – Welcome the proposed public realm, improved landscape design with active travel links to green space and more public open space with civic quality as this in line with the GG1 and GG3 objective. St Edwards way– Welcome the vision to deliver multiple residential-led mixed use developments on the site with ground floor employment/retail uses along St. Edwards Way as this works towards meeting the OA indicative capacities and objectives GG2, GG4, GG5. – Welcome greening and recharacterization of the ring road as in line with GG3 as it will work towards addressing the existing poor air quality from St. Edwards Way and London Road. The masterplan outlines that this greening is set to form part of the wider strategy to create a more attractive environment around the ring road – GLA officers would be keen to have a greater understanding of this ring road strategy around the town centre. – Supportive of the vision to naturalise the eastern bank of River Rom and incorporate a site-wide nature-based SuDS strategy as in line with GG6. Welcome activating the river frontage with linear park and integrating into the site masterplan – Supportive of connectivity the brief makes to Site Guidance Area 1- The Market Place) through the proposed primary green link along the High Street that will form part of the east-west green connection across the town centre,



connecting Cottons Park in the west with Lodge Farm Park in the east. Brewery– GLA officers recommend that the proposed 'potential for a new western entrance to Romford Station on Exchange Street' and any proposal detail is reviewed by TfL. – GLA officers welcome the diversification of land use to include residential use as this is in line with GG2 and GG4, GG5 as well as working towards reaching indicative housing and job capacities for Romford OA. o Similarly, GLA officers welcome setting out the introduction of commercial developments (other than previously predominantly retail) in order to improve the employment offer. – Supportive of the inclusion of cultural and community amenities as part of the key deliverables in the Brewery site's masterplan as in line with GG1, GG3. – Welcome activating the river frontage with greenery as this creates north-south links through the site and increasing pedestrian and cycle permeability between the high streets that surround The Brewery site. – Supportive of the breaking up of the redevelopment site into smaller urban blocks, creating internal streets and east – west links between South Street, Waterloo Road (ring road) streets as well as to River Rom. – GLA officers would be interested to see the proposal or illustration or section of the 'arrival space' proposed to the north of The Brewery (opposite the proposed station entrance) and how it will be accessed. Recommend the inclusion of an 'Illustrative View Point' or section within the site guidance. – GLA officers would be keen for The Brewery site guidance to include strategies such as lighting or day vs nighttime activity of the land-uses along the river/Brewery Gardens Park to ensure the provision of a safe night-time experience for all. See some toolkits and handbook recommendations in note in comments on previous pages of this review. GLA officers recommend that the proposals considered in the Station Gateway site guidance which includes a new station entrance, bus re-routing and the re-provision of bus standing spaces etc is reviewed by TfL. – Welcome activating the river frontage an east-west link created by bridges as they connect the Station Gateway to the Bridge Close redevelopment proposal. GLA officers would be keen for site guidance to include day vs night time activity of the land-uses along the naturalised river edge to prioritise the provision of a safe night-time experience for all. See some toolkits and handbook recommendations mentioned in comments on above rows of this review table. – Employment space provision focused around the railway line and within the wider site area to the south of the station is in alignment with GG2 as it prioritises sites which are well-connected by existing public transport. - GLA officers encourage the site guidance to include suggested heights for the employment use building blocks proposed to front the railway lines. – GLA officers would be keen to understand the new link under the railway lines for pedestrians and cyclists open at all times – suggest TfL review. GLA officers welcome the site vision to deliver a predominantly residential neighbourhood with employment focus along Rom Valley way as this is in line with GG2 and GG4, GG5 as well as working towards reaching indicative housing and job capacities for Romford OA. - Additionally, welcome the preservation of existing employment uses – Supportive of the reducing of car park spaces to accessible provision only to prioritise pedestrian use and active travel access – this contributes towards the Good Growth Objective 3 (GG3) and the Mayor's net-zero target ambitions. Additionally, welcome the proposed creation of 'active travel streets.' - recommend a TfL review street proposals. – Recommend that TfL review the urban street proposal relating to public transport. – Employment space provision focused on the Rom Valley Way highway is in alignment with GG2 as it prioritises sites which are well-connected by existing or proposed public transport. – Welcome the creation of smaller blocks and greening of the parallel internal streets created – improving permeability, connection to consented redevelopment to the east and north, plus River Rom engagement. – Welcome the incorporation of a nature-based SuDS strategy on street towards River Rom to manage flood risk as in line with GG6. GLA officers question whether the "potential intimate space behind the Bull Pub" shown in Fig. 106 is a public open space and would recommend reference being made to the alignment of proposed public open spaces like this one to the Policy D8 Public Realm. You should also refer to the GLA design guide Expanding London's Public Realm and Public London Charter. An 'illustrative view point' of this space could also be of benefit in the masterplan. – Recommend that TfL review the urban street proposal for the re-characterisation of Mercury Garden. – It is mentioned that 'appropriate building heights and massing will be informed by detailed contextual character analysis and impact studies', GLA officers are keen view this analysis and associated methodology. – Welcome diversification of commercial land use to include residential uses on upper floors as this is in line with GG2 and GG4, GG5 as well as working towards reaching

indicative housing and job capacities for Romford OA. – GLA officers welcome the site vision to deliver a predominantly residential neighbourhood with employment focus along Rom Valley way as this is in line with GG2 and GG4, GG5 as well as working towards reaching indicative housing and job capacities for Romford OA. – Welcome retaining retail focus on ground floors facing the Market Place and South Street. Thus, retaining character, townscape and open public space and cohesion with site guidance for The Market Place. – Welcome the creation of smaller blocks and greening of the internal streets created which are predominantly ‘active travel streets’. This aligns with objective GG3. Mercury – Welcome the de-prioritisation of car use on the site and connection to the Liberty – approach towards objective GG3 and Mayor’s net zero ambitions. – Welcome diversification of land use to include residential uses and other commercial uses beyond retail as this is in line with GG2 and GG4, GG5 as well as working towards reaching indicative housing and job capacities for Romford OA. – Supportive of the inclusion of education, cultural and other community amenities as part of the key deliverables in the Mercury site’s masterplan as in line with GG1, GG3. – GLA officers suggest more reference be made on how the residential areas to the east (across Junction Road) and south (across Western Road) of the site should be considered in all these themes within the Mercury site guidance. North Street - Supportive of ‘up to 7 storeys’ (as referenced in Section 2.2.5 Heights) on North Street as this height is not over-powering to the 2-3 storey homes within in its immediate surrounding area. – GLA encourage the inclusion of height and massing design guidance as to how the existing building character, types and street frontages on North street will be reinforced where taller buildings/intensifications are proposed and how they will integrate residential buildings parallel to the high street. – The potential for the transformation of the roundabout into a public open space as illustrated might require further review once the concept is developed. – The masterplan raises the question of the potential for relocation and subsequent redevelopment of the bus garage in the vision, land use section of the guidance. Suggest TfL officers review the bus route/garage proposals. Civic Campus Welcome the reinforcement of existing civic and local character and integration of parks and greens spaces between new developments as this works towards objectives GG3 and GG6. GLA officers recommend reference being made to the alignment of proposed public open spaces like this one to the London Plan’s Policy D8 Public Realm. You should refer to the GLA design guide Expanding London’s Public Realm and Public London Charter. – Welcome the early opportunity for The Town Hall car park to deliver public realm enhancements. – Welcome diversification of land use to include residential uses and employment generating commercial uses as this is in line with GG2 and GG4, GG5 as well as working towards reaching indicative housing and job capacities for Romford OA. – Welcome the opportunity for new community uses and civil anchor for the neighbourhood as part of the Civic Campus’ key deliverables masterplan as in line with GG1. – Supportive of the creation of two north to south internal streets, linking the Campus site to the surrounding residential neighbourhoods. Crow Lane Employment space provision concentrates around the railway line is in alignment with GG2 as it prioritises sites which are well-connected by existing public transport. – Supportive of the vision to create a residential neighbourhood with high-quality public realm and improved walking and cycling connections to the town centre and through the railway embankment. "Thank you for consulting the Greater London Authority (GLA) on the Romford Masterplan. GLA officer comments are provided in section 1: Key points, with more detailed comments on specific aspects of the draft considered in section 2: Appendix. Please note that this is an officer level response. The advice in this letter provides guidance on mainly regeneration and growth strategies-based issues with reference to the LP2021. I hope you find these comments helpful to inform the preparation of the Romford Masterplan

**Key Points 1.1** The GLA welcomes the development of the draft Romford Town Centre Masterplan. The document adopts and promotes a design - led approach to delivering good growth, in line with the Good Growth Objective 2 (GG2) and Policy D1 of the London Plan 2021. GG2 encourages local planning authorities to proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development.

**1.2** GLA officers welcome the overarching intention of the document to follow Part B of Policy SD7 of the London Plan 2021 to assess and allocate sites to accommodate identified need within town centres, considering site suitability, availability and viability.

**Growth Corridors 1.3** Romford Strategic Development Area (paragraph 2.1.3): Welcome the reference to the London Plan and the Opportunity Area (OA). Officers

	<p>suggest mentioning that Romford is within the Elizabeth Line East Growth corridor, as identified in Figure 2.9 of the London Plan. Opportunity Area boundary 1.4 GLA officers note that Romford was designated as an OA in the 2021 London Plan and this town centre masterplan provides an opportunity to define and adopt the OA boundary. GLA officers welcome the opportunity to define the OA boundary. 1.5 Officers notice that the SDA boundary presented in the draft Masterplan SPD is different from the SDA boundary shown in the 2016-2031 Havering Local Plan (adopted in 2021), and which is used as an 'emerging boundary' on the OA webpage. The SDA boundary as shown in the adopted Local Plan against the SDA boundary shown in the masterplan SPD and is presented under Appendix 2. GLA officers would be keen to understand what has driven the deviation from the SDA boundary. London Plan Indicative capacities 1.6 The London Plan 2021 identifies an indicative capacity of 5,000 new homes and 500 new jobs by 2041 in Romford. 1.7 The draft masterplan mentions that 'The London Plan sets a minimum target of 5,000 new homes and 500 new jobs for Romford by 2041' (1.1.5, page 102). Officers suggest that this is amended to reflect the following: 1.8 The figures provided in the London Plan (Table 2.1) are indicative capacities, and not targets. They are subject to more detailed work as such undergone in the draft Romford Masterplan. 1.9 Since the adoption of the London Plan 2021, a new London Employment Sites Database (LESD) was produced in 2021 (Link). This provides up to date estimates by OA (page 31). The most up to date indicative jobs capacity figure for Romford OA is 700 new jobs. 1.10 LESD is a database that records recently completed employment developments and those in the pipeline in London to produce an estimate of London's additional employment capacity. 1.11 The Masterplan forecasts higher growth potential than the LP indicative capacities (10,000 – 12,000 new homes by 2041 5,150-5,550 homes by 2031). This is welcome. Please see below further comments on capacities assumptions/ density and heights. Structure of the document 1.12 Welcome the comprehensive analysis provided in the Romford Town Centre Masterplan Baseline Report. It demonstrates a good understanding of the Romford OA, including urban form, demographics, ecology constraints, and economy. The main masterplan document would benefit from a short summary of the key analysis findings in each section (potentially a coloured text box with key bullet points, or a SWOT analysis by theme in the second chapter 'Romford in context'). This would help demonstrate how the analysis supports the propositions and make the link between the two documents clearer. 1.13 The SPD is clear, easy to read and benefits from diagrams and illustrations indicating place qualities and key principles of what this place would look and feel. This is supported. Delivery 1.43 The Masterplan adopts the five-year housing periods in the Havering Local Plan and extends these to 2040 / 41 which GLA officers welcome as this aligns with the 2041 target year within London Plan's housing and job indicative capacities for OAs. 1.44 GLA officers are interested in seeing more detail on the methodology used to assume figures for the growth potential for each of the five-year periods shown in Table 33. 1.45 The masterplan outlines that expenditure on the improvement of public spaces is expected to increase with new jobs in the town centre. GLA officers are interested in understanding how this has been estimated. 1.46 Havering Council owns significant locations on SDA land as reported in Chapter 7.3 of the masterplan and it plans to deliver through collaborative working with the Romford BID, GLA and TfL and joint ventures which is supported. However, given that the majority of the shopping centres in the Town Centre are privately owned, GLA officers are keen to see the delivery route for these specific assets that are key to enhancing the retail offer that is expected to create additional jobs. 1.47 The Masterplan 'has been informed by market and delivery considerations to help ensure that it is deliverable and can succeed in facilitating a high-quality, successful place.' GLA officers are interested in understanding these considerations. 1.48 Under chapter 6 'Site Guidance' there is a sub-section dedicated to implementation. This feels quite a key component for the delivery of the masterplan. It provides some high-level priorities/ actions for delivery, and it highlights how development may come forward, to unlock sites. Currently, it feels a bit 'hidden' in the document. GLA officers suggest that the info captured under each one of these sections could be put together to shape an indicative phasing/ prioritisation map/ roadmap for the whole opportunity area."</p>	
<p>NHS North East London</p>	<p>"Pg 37, 4.3.1 - Space and Landscape Space and landscaping are intrinsic to improving people's health and wellbeing and are key to prevention strategies. There are numerous studies that reference the benefits of green infrastructure to people's physical health, mental health, social wellbeing, built environment aesthetics, skills and</p>	<p>"We welcome the response and recognise the current</p>

<p>employment and tourism and leisure activities. The strategy would be enhanced by recognising the economic benefits of the above in a meaningful way to benefit the area, not least because Queen’s Hospital is currently serving double the population it was built to serve. Space and landscape have a fundamental role to play in Romford to improve the population’s physical and mental health and wellbeing (in the form of preventative measures) to reduce the pressure on acute services at Queen’s hospital. Pg 48, 5.2 Space &amp; Landscape NHS NEL welcome reference to child friendly networks for play. However, we feel strongly that the space and landscape strategy would benefit from a greater emphasis upon ensuring that children live in well-designed neighbourhoods as well as have access to play opportunities within the town centre. Ensuring that areas are well designed for children is essential to them being active from an early age and reducing childhood obesity rates (again, forming a fundamental pillar of preventative healthcare). Initiatives such as the Van Leer Foundation’s Urban 95 agenda have a well documented evidence base that if the built environment (cities in particular) are designed for babies, toddlers and caregivers then the design benefits everyone, as the population has access to better services, affordable transport and safe, clean and green spaces for families and others to gather. If the Romford masterplan were to take this approach it would be highly innovative and provide a truly inclusive strategy to providing space and landscaping. This principle is also directly applicable to inclusive design. Pg 82, 5.4.2.2 Biodiversity net gain and urban greening factor NHS NEL welcome reference to seeking to reduce the urban heat island effect through increasing urban greening. Reducing the urban heat island effect is not only critical to the existing town, but it is also important that future development within the town centre does not exacerbate the problem. Significant changes in temperature directly increase the number of hospital admissions, and so again, it is very important that any landscape reduces the urban heat island effect. "Pg 39, 4.3.3 – Sustainability NHS NEL support the development of a heat and power network within the town centre. There is clear potential for one to be developed involving a number of assets within 1KM of the town centre. Public sector organisations within the town centre should work together in a similar vein to One Public Estate workstreams to try to development a network. Given the proposed additional healthcare facilities and the leisure centre comprising of an ice rink and swimming pool, within the town centre, there is clear potential for a network to be developed. NHS NEL also support opportunities for food growing within the town centre, as not only does food growing connect people more to healthy, fresh food, but also offers greater opportunities for social prescribing. For example, if every neighbourhood had a community food growing initiative this could mean that all GP surgeries could provide gardening as part of their social prescribing services which would reduce pressure on acute NHS services. Whilst we appreciate the complexity of negotiating planning applications, opportunities within the landscaping of new developments should be maximised as landscaping within development has an important role to play in contributing to the population’s wellbeing. The social role that food production in the form of allotments and community food growing schemes can provide through offering more opportunities for social connection should also not be underestimated. Finally, given the anticipated growth within Romford town centre NHS NEL would welcome an objective to reduce the urban heat island effect, as this is often a risk with dense new developments. Whilst this is referenced later in the document, it should also be referenced within this section. Pg 40, 4.3.4 Inclusivity, Health and Well-being NHS NEL feel strongly that there is incredible potential for the masterplan to directly influence and improve inclusivity, health and wellbeing for the population of Romford town centre. As noted above we would welcome the inclusion of the London Prosperity Board’s East London Citizen Prosperity Index to ensure that the projected growth within the area genuinely improves the life chances and life security (access to secure jobs and secure homes) of the residents of Romford town centre. Pg 108, 5.7.2.7 Healthcare facilities The masterplan makes some assumptions in relation to healthcare facilities that are a little presumptuous at this point in time. The masterplan assumes that healthcare facilities will be provided in 6.4 Brewery, 6.7 Liberty, and 6.8 Mercury, however it is very unlikely that this will be the case as there is no evidence that they will be needed within all of these locations, particularly given that they are all in relatively close proximity. Additionally, any healthcare facility within these locations would need to ensure that they are offered on terms affordable to the NHS, as all too often health facilities within new developments are offered on commercial deals or have high service charges. The masterplan should be directly linked to the Infrastructure Delivery Plan (IDP) to ensure</p>	<p>challenges for the NHS and appreciate that an uplift of the population increases the demand on healthcare services, the Masterplan aims to identify possible locations for further facilities in the site guidance and acknowledge potential intensification of existing services. The Masterplan recognises the importance of the places in which people live, learn and work in supporting health and wellbeing. ‘Inclusivity, Health &amp; Wellbeing’ is one of the seven key Masterplan themes, with specific elements relating to health and wellbeing having been embedded across a number of the underlying design principles and objectives and scheme guidance. The Council will continue to involve all Healthcare partners on an ongoing basis as the masterplan is implemented, with consideration of the NHS North</p>
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<p>that infrastructure provision is planned for appropriately. The IDP is a live document and is updated regularly, so it will be an invaluable resource to planning for future healthcare provision in the area. The masterplan assumes that the Bridge Close development will definitely be coming forwards, however there remains much uncertainty about its delivery due to the need to relocate the London Ambulance Service (LAS) from the Romford Ambulance Station at Bridge Close. Until a suitable site is found for LAS it is unlikely that the scheme will progress. Nonetheless, the inclusion of a health hub at Bridge Close remains central to masterplanning for healthcare provision within Romford Town Centre as it is likely to be the most affordable option to the NHS. It is therefore critical from a healthcare planning perspective that Bridge Close is resolved soon as it is central to delivering healthcare to the projected new population. It should also be noted that the statement within this section that 'It should be noted that the Bridge Close redevelopment is displacing the London Ambulance Station Romford depot through a compulsory purchase order (CPO) and a new site for the new station has been selected (see Project ES01)' is factually incorrect as no new site has been selected yet. This statement should therefore be removed from the masterplan Pg 54, 5.2.2.4 The Market Through the vision for the market, there is a clear opportunity to ensure that the market continues to provide access to good quality affordable food through the fruit and veg, fishmonger and butcher stalls. All too often London markets have gone from providing good quality affordable food to only providing street food to cater for people who have moved into the area which has further increased health inequalities. A strategy for ensuring that the market continues to provide good quality, affordable food is fundamental to the aspirations of the masterplan and the long term health of the population. Rom Valley and Victoria Hospital Rom Valley and the old Victoria Hospital site remain critical to future healthcare planning for Romford, particularly as both offer opportunities for BHRUT to move some outpatient services to these locations to free up space within Queen's Hospital. However, again, it is important to note that there is uncertainty as to whether Rom Valley will come forwards and on what terms it will be offered to the NHS. In order to ensure certainty for healthcare planning within the masterplan area, Rom Valley is critical to delivery if it is offered on affordable terms. Similarly, the old Victoria Hospital is an NHS Property Services freehold asset and will therefore be much more economical to provide services from this site, and so again is critical to service delivery. "We welcome some of the improvements to Romford that will undoubtedly provide opportunities to improve the lives of the current and future residents. Nevertheless, the scale of change and significant increase in residential developments inevitably causes concern for healthcare provision as the projected increase in population and demand will add pressure to a current healthcare system that is challenged for capacity. We therefore ask that you consider our response carefully and continue to include all Healthcare partners on an ongoing basis as the Romford Masterplan develops. I write on behalf of the Regeneration and Infrastructure team at the NHS North East London Integrated Care Board (NHS NEL) in relation to the Consultation that the London Borough of Havering are currently undertaking on the draft Romford Masterplan Supplementary Planning Document (SPD). Our response will take the format of general comments in relation to the document structure and population growth before moving on to specific comments relating to sections within the document. General comments Document structure Overall, the structure of the document is quite disjointed and feels as though a number of the topics are repeated in different sections. The document would benefit from a review to ensure that the vision and objectives are clear at the start and then the topics or themes could be further developed. At present the key themes, objectives and masterplan themes sections are repetitive and lack impact. Our modelling shows that the wards where there will be significant population growth are St Alban's, St Edward's and Rush Green &amp; Crowlands (see below: (IMAGE)In terms of population growth our calculations suggest that there will be an uplift in population within the Romford Town Centre Masterplan area of between 25,000 – 28,000 people: IMAGEThis would equate to an additional 22 General Practice rooms being required and the associated staffing to deliver care. This does not include the resulting increased demand for community services or acute services. Queen's Hospital is also already operating at double its capacity and is restricted in terms of its development potential due to it being a Private Finance Initiative hospital. It is therefore critical that the impact of population growth upon Queen's Hospital is properly considered, mitigated and planned for as part of the masterplan. Pg 21, Figure 07 Figure 07 currently suggests that the car park of Queen's</p>	<p>East London IDP. The Masterplan Chapter 7, implementation, and section 7.4.5 infrastructure projects have been updated in line with responses received.</p>
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	<p>Hospital is in use as Use Class B1c. This is incorrect and we request that this area is coloured blue to align with the rest of the hospital site. Notwithstanding this, following the changes to the Use Classes Order in 2020 Use Class B1c no longer exists. Therefore, any references to use classes should be up to date to ensure that the document is robust. Pg 34, 4.2.2 – An infrastructure led approach Similarly, there is much more that could be said within ‘an infrastructure led approach’ to elaborate upon the importance of not only healthcare infrastructure but also healthy homes being considered as infrastructure to reduce health inequalities. Additionally, the impact of population growth upon acute healthcare should be properly considered and addressed to ensure that the burden on acute services isn’t further exacerbated. Paragraph 7.4.2 Funding This section makes reference to the Estates and Technology Transformation Fund. Funding has not been available from this fund since 2020. Please remove reference to this as it is inaccurate. Background to affordability NHS NEL thought it would be helpful to share that where boroughs are seeking to secure space within developments for NHS NEL, NHS ICBs in London are unable to consider a facility provided by a developer to shell and core at an open market rent. This is not deemed an appropriate or adequate mitigation and the NHS NEL ICB funding formula does not enable this level of expenditure to be allocated to funding health infrastructure. This is because in areas such as London market rates and service charges are high. Where schemes will be providing new space as on site health mitigation, we would request that this is done in consultation with NHS NEL as it is critical that new infrastructure accords with the need identified within the IDP. This will ensure that any new space is also in accordance with the forthcoming NHS NEL Infrastructure Strategy. In order to be affordable to the NHS, rental levels for a shell and core health facility should be reduced, below market rents having regard to development viability and other s106 priorities. Where viability will allow, our preference would be for a peppercorn 125 year long lease to provide new healthcare facilities. NHS NEL would consider different funding options for delivering new facilities such as the use of developer contributions or other funding sources to fit out premises and reduce or negate rental costs. Where there would be an impact on health arising as a result of development, but the development is not in a location where NHS NEL would want a facility (i.e site not in accordance with the IDP), we would request that an appropriate capital contribution in lieu of provision is provided. Future engagement Please do not hesitate to contact me should you have any queries regarding any aspect of this letter. We hope that our comments will be taken into account and look forward to continuing to work with you to secure high quality health care infrastructure for the London Borough of Havering and a built environment that reduces social inequality within the borough through preventative measures. "</p>	
Thames Water	<p>"The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes ""Flooding from Sewers"". When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas. Flood risk sustainability objectives and policies should also make reference to ‘sewer flooding’ and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development. With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, water-courses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding. Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change. SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency;</p>	<p>Comment noted. Policy detail is set out in the Havering Local Plan. The Local Plan update will reflect new policy. Flooding, attenuation and water efficiency are all considered in the Masterplan alongside the greening of the SDA and opening up of the river Rom.</p>

provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits. With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan "It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding. "Basements – Sewage Flooding Thames Water's main concerns with regard to subterranean development are: 1) The scale of urbanisation throughout London is impacting on the ability of rainwater to soak into the ground resulting in more rainfall in Thames Water's sewerage network when it rains heavily. New development needs to be controlled to prevent an increase in surface water discharges into the sewerage network. 2) By virtue of their low lying nature basements are vulnerable to many types of flooding and in particular sewer flooding. This can be from surcharging of larger trunk sewers but can also result from operational issues with smaller sewers such as blockages. Basements are generally below the level of the sewerage network and therefore the gravity system normally used to discharge waste above ground does not work. During periods of prolonged high rainfall or short duration very intense storms, the main sewers are unable to cope with the storm flows. The policy should therefore require all new basements to be protected from sewer flooding through the installation of a suitable (positively) pumped device. Clearly this criterion of the policy will only apply when there is a waste outlet from the basement i.e. a basement that includes toilets, bathrooms, utility rooms etc. Applicants should show the location of the device on the drawings submitted with the planning application." "Although the area is not within the Thames Water supply area, water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in the Policy. Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link: <https://www.thameswater.co.uk/Be-water-smart> It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations. Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the 'Calculation Method' or the 'Fittings Approach' (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels. Proposed policy text: "Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the 'Fittings Approach' in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met." "We consider that there should be a separate policy covering water supply and wastewater infrastructure in the Masterplan. Wastewater/sewerage and water supply infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure. Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of sewerage/wastewater

treatment and water supply infrastructure. A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2023, states: "Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater..." Paragraph 11 states: "Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that: a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects" Paragraph 28 relates to non-strategic policies and states: "Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure..." Paragraph 26 of the revised NPPF goes on to state: "Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary..."

The web based National Planning Practice Guidance (NPPG) includes a section on 'water supply, wastewater and water quality' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that "Adequate water and wastewater infrastructure is needed to support sustainable development" (Paragraph: 001, Reference ID: 34-001-20140306). The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water's asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling. As from 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The changes mean that more of Thames Water's charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges. Information on how off site network reinforcement is funded can be found here <https://developers.thameswater.co.uk/New-connection-charging> Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met; •

[The developments demand for water supply infrastructure]. Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water's free pre planning service are available at: <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

In light of the above comments and Government guidance we consider that the SPD should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development proposed in a policy. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the SPD include the following policy/supporting text: **PROPOSED NEW WATER / WASTEWATER INFRASTRUCTURE TEXT** "Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades." "The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing



	<p>conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development." Site Allocations: The level of information does not enable Thames Water to make an assessment of the impact the proposed development will have on the waste water/sewerage network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the type and scale of development together with the anticipated phasing. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website <a href="https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development">https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development</a>. It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution. We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured wastewater and water supply matters for the development are being addressed."</p>	
<p>Consultants on behalf of the owners of the Atik Nightclub</p>	<p>"5.6.2.2 Contextual height and massing: The proposed height thresholds should be treated as indicative only and there should be a clear statement that where site circumstances allow, additional height will be considered acceptable. The heights indicated for the former Atik Nightclub do not take into account that the site sits adjacent a 9 storey hotel building. Furthermore, it is large plot adjacent to the Train Station so is a prime development opportunity which should be optimised. For this reason, we do not consider that it is appropriate to apply a maximum height threshold."</p> <p>"2.3.1.5 Residential: We endorse the Masterplan strategy aimed at promoting a variety of housing options as part of a mixed-use development in Romford. The ambitions for the town centre to be a hub that serves both the daytime and night time economies makes it the perfect location for rental and alternative housing forms, such as shared living (sui generis). The Atik site in particular with its adjacencies to the train station and the proximity to the large employers like the Queen's Hospital would be ideally suited to deliver such rental living uses that are not necessarily focused towards families. Family sized homes would benefit from being located for example in the Brewery Garden quarter closer to parks and squares. 5.7.2.5 Housing: We support the Masterplan strategy to encourage a range of housing to rent and buy as part of mixed use development in Romford. It is also noted that Build to Rent developments are considered best suited to the Town Centre. We propose that recognition is included for how other forms of housing such as shared living (sui generis) can deliver distinct benefits for Romford. This type of housing can help deliver on a number of the objects for Romford Town Centre, namely: -Contributes to meeting housing targets. -Provides a contribution towards affordable housing. -Can help free up family housing currently used as HMOs. -Provides high quality well managed accommodation at a more affordable price point than house and flat shares. -Increases footfall and activity in the Town Centre. -Helps create attractive compact places that reduce the need to travel. - Plays a key role in delivering homes for local workers that can help keep people living and working in the area. We therefore propose that masterplan includes recognition for shared living as a typology that is well suited to Romford Town Centre. We should also note that not all town centre sites will be suitable for family housing. 5.7.2.3 Flexible space: The proposed 4.5m floor-to-ceiling height for the ground floor of mixed use buildings should be applied flexibly depending on the site and the specifics of the proposal." "5.7.2.2 Business space: We support the statement that Romford should be a focus for start up and growing businesses. It is noted that at present there is little space provided for them. Proposals that include a quantum of co-working space should be encouraged and linked to the comment above about recognising the benefits that shared living accommodation can have in the Town Centre, such schemes often include workspace at ground floor that allows people to live and work in the same building and for local people to also use the space. There are clear synergies between the two uses and the associated benefits for the Town Centre so this should be recognised in the Masterplan." "6.4 Brewery: Fig. 78 shows the existing Brewery</p>	<p>We welcome these comprehensive comments on the Masterplan and its impact upon Romford town centre. Whilst it is considered that the Masterplan fundamentally continues in the same, positive direction, minor amendments to improve clarity have been made. It has not been considered appropriate to extend the Brewery core development area to include the Atik site. It is worth highlighting that it is already within the general site guidance area.</p>

context. The red line indicates the Core redevelopment area. However, it does not include the Atik Nightclub which is a missed opportunity because the site is substantial and can positively contribute to the town centre. It is previously developed land adjacent to the Train Station so presents an excellent development opportunity which should be recognised more clearly. It is a longstanding vacant building which is prime for redevelopment and can deliver on a number of the Masterplan objectives including delivering homes, co-working space and public realm. The former Atik Nightclub should therefore be included in the Core redevelopment area. Fig. 79 shows the Brewery site opportunities and objectives but again does not include the former Atik Nightclub. It is proposed that the site is included with reference to its potential to deliver new homes, co-working space and public realm. It is an important site adjacent to the Train Station and this should not be missed. Fig. 80 shows Indicative ground floor use strategy. As above this should include the former Atik Nightclub recognising its redevelopment potential to deliver active ground floor uses such as co-working spaces (with homes above) given its prime position within the Town Centre and adjacent to the Train Station. Fig. 81 shows Indicative public open space provision and locations. The plans for the former Atik Nightclub have a new public square included which would contribute towards the "Masterplan key moves" set out at 4.2.1 and "Space and Landscape" set out at 4.3.1 which include delivering green links and a wide range of public spaces."

"2.4.1 Opportunities for change. Urban Sketch has been working on the former Atik night club site and consider how the proposals tie into the wider masterplan and contribute to transforming the town centre into a vibrant new district that will attract a new residential community.4.2.1 Masterplan key moves: We see the introduction of new green corridors as a positive move especially the greening of Eastern Road that can be part of an improved connection to existing station entrance & the well-used Romford walkway. The proposals for the Atik site will create a new vibrant public square along this route tying into the newly revamped Battis.. 4.3.1 Space & Landscape We support the objectives set out at SL1 – SL9. These focus on delivering a wide range of public spaces including high quality streets, pocket parks, squares and roof gardens. The proposals for the former Atik Nightclub can deliver and tie in with these key objectives. The proposals for the Northern Green corridor is seen as a positive move the Atik site will ensure the scheme has its front door along this route to activate the area and provide passive surveillance." "These representations are made by Urban Sketch to the Romford Town Centre Masterplan - Final Consultation Draft - 22nd August 2024. Urban Sketch is a development business passionate about pioneering innovative solutions for the built environment across towns and cities. Our approach centres on forging strong partnerships with the public sector and local communities to create vibrant, sustainable and successful places. We are working in partnership with the owner of the Atik night club to bring this site forward for comprehensive redevelopment. The site has not traded as a night club for nearly a year, have been extensively vandalised following a break and has been in a state of disrepair. The building is now a derelict asset and Urban Sketch intend to bring the site forward for redevelopment. Urban Sketch welcomes the Romford Town Centre Masterplan as it will provide a helpful guide for developers and land owners when it comes to bringing forward development in Romford. The following representations address certain aspects of the draft document relevant to the proposals at the former Atik Nightclub. 2.2.3 Key Heritage Assets Fig. 04 shows, "Key Heritage Assets at the core of the town centre". However, with regards to Locally Listed Buildings, it is not in accordance with the Havering Local Heritage List which was published in July 2024 and extensively consulted upon. Figure. 04 suggests that the properties adjacent to the former Atik Nightclub, 110 and 112-116 South Street are Locally Listed Buildings. However, there is no reference to these properties in the Local Heritage List and we consider this to be an error. It is acknowledged that the evidence base document prepared by Authentic Futures in 2020 identifies these properties as Locally Listed Buildings. However, this document pre-dates the Council's own Heritage List which was published as recently as July 2024. There has been no consultation on the sites falling within a local listing. It is also acknowledged that the Romford Town Centre Masterplan Baseline Report August 2024 suggests these properties are Locally Listed. However, the new Heritage List was subject to extensive public consultation so has been through a thorough process to identify heritagThe fact that these two properties are not included is sound enough reasoning for this to remain the case. It is therefore proposed that a full review of the heritage assets identified in the Masterplan is

	<p>undertaken so it is accurate and up to date. It would also be suggested that the heritage evidence base is updated given it is nearly 5 years old."</p>	
<p>Network Rail</p>	<p>Green Buffer Proposals for any green buffer (page 198), whether new or alteration of existing must be consulted with our Asset Protection (ASPRO) team as this can increase risk onto the railway. Network Rail will also require confirmation of proposal on and adjacent to our land and the wider railway infrastructure corridor. "Background Network Rail (NR) is the statutory owner and operator of the national rail infrastructure in England, Scotland and Wales. NR's focus is on safely and efficiently operating, maintaining, and growing the railway. NR has provided important general and site-specific comments to the London Borough of Havering Council's Romford Masterplan consultation. Sub-Sections 1) Development a. Freight Sites – Strategic Importance for Policy and Development 2) Railway Infrastructure a. Concerns for New Station Entrance b. Concerns for Funding c. Wider Infrastructure 3) Further Consultation Requirement &amp; Future Policy Engagement 4) Asset Protection (ASPRO) a. Appendix A – Aspro Informatives. 1. Development For future development schemes in the Romford area and wider area in Havering Borough Council, NR requires that if any new infrastructure requirements affect NR and the operational railway (including Stations, Maintenance Depots, etc.) then the appropriate agreements must be entered into by the promoters. a. Freight Sites – Strategic Importance for Policy and Development Freight sites and equivalent land uses require strategic support, inside and outside of the rail industry. This would include strategic support from planning policy. Planning policy in the context of policy designations for freight would be identified as applicable to any site and the surrounding area. Freight sites are of notable material consideration to all developments, whether the nearest freight site is either inside or outside any masterplan area, or the Council's area of jurisdiction. In relation to any specific sites the form and type of development permitted, then there should be relevant planning policies identified at all levels – Including Masterplans. Especially as the strategic importance of this area of policy is evident at the National level, which is set out below: National Planning Policy Framework [NPPF] (2023) i. In the context of facilitating the sustainable use of minerals, NPPF Paragraph 215 is clear that it is essential that there is sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. ii. Paragraph 216 (e) provides that planning policies should: "safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material" (our underlining). 2. Railway Infrastructure NR has a key requirement to manage risk appropriately across the network. For this masterplan consultation, Network Rail raises concerns about multiple elements which at this stage do not provide enough detail. These include details on any new station entrance, as well as clarity on mentioned funding arrangements, which might possibly include or depend on legacy / historic funding mechanisms which are no longer available. a. Concerns for New Station Entrance As highlighted in your policy, under sub-section "Railway &amp; Station Entrances" (page 67) further works will be required with Network Rail and others. However, can you please confirm who at Network Rail have the Council been engaging with, if already, and how have these teams progressed these Council design concepts for a new station entrance? If no contact has yet been made, then please provide necessary strategy details on who at Network Rail needs to be engaged and how you plan to achieve this proposal? b. Concerns for Funding Following the new station entrance concerns above, Network Rail has further concerns on the proposed funding mechanisms and sources for this infrastructure proposal. For instance, this policy references in "7.4.2 Funding" (page 204) Network Rail funding of the Elizabeth Line. However, as this line is now open and the project is all but likely closed, therefore can the Council please provide greater clarity on what Elizabeth line funding you are referring to? c. Wider Infrastructure New crossings of the railway are possible, but these must be by bridge and we would expect the resulting structure to be vested in the highway authority or another statutory undertaker. In all cases where new crossings of the railway are required, NR's shared value policy will apply. There may also be some road bridges where enhancements to footway provision (necessitating a widening or restriction on traffic) are suitable. Again, we would expect the developer to fund any such works. Aside from bridges and crossings, improvement to railway boundary fences may be required if areas that are currently remote are developed for housing or industry. We would expect developers to fund necessary upgrades. 3. Further Consultation Requirement Furthermore, it is difficult at this early policy stage,</p>	<p>Comments noted. The Masterplan includes aspirations with further detail as development within the masterplan area comes forward. Specific agreement details can best be approached at the planning application stage, with suitable proposals for funding. Requirements for development that may impact on Network Rail assets will be specifically worked on with Network Rail representatives.</p>

	<p>and from the information provided to determine exactly what the impacts will be or where all the sites will be. Therefore, NR requires the Council make it a requirement for appropriate developers to consult with us in the future as plans develop at each site. However, for information, please find enclosed a series of informatives that should be taken into account for any works or proposals that are in proximity to NR's infrastructure. NR is keen to engage with the Council and would welcome the opportunity to be involved in the ongoing preparation of the Romford Masterplan planning policy and other subsequent Havering Local Plan consultations. NR would welcome the opportunity to discuss further policy and possible site policy protection and infrastructure intensification of land in Havering, whether the extent of this/other plan(s) impacts NR on the local, regional, or national level. We particularly welcome the opportunity to work with the Council in relation to its urban regeneration aspirations. NR places importance on infrastructure plans and intensification of sites impacting the operational railway. Therefore, sites should not be assumed to not have any impact and allocated favourable in policy for any residential or mix-use allocation, unless it is supported by and of benefit to the railway undertaker or is confirmed to be of no notable detrimental impact to the railway."</p>	
<p>Havering Council Labour Group</p>	<p>"INTRODUCTION 1.1 In an evolving and competitive regional economy, having a strategic vision and a comprehensive plan for the future of Romford, to facilitate inward investment and to promote the stimulation of local jobs is proactive and prudent. The Labour Group are aware of what happens when Town Centres fail. The Town dies; its shops and restaurants become vacant. Young people lose access to a wider offer of jobs and opportunities; some young people growing up in economically deprived centres lose their way and end up in the criminal justice system. It shocks us all that some in our community reject the very notion of having a masterplan. This is dangerous complacency given the many threats to the vitality and viability of Romford. 1.2 Some critics might say this masterplan is too aspirational. However, it is infinitely better to adopt an ambitious masterplan rather than a mediocre plan. The Labour Group have always been clear, having a masterplan lays the foundations on which a resilient Romford Town can be regenerated. Having a masterplan will ensure that development and infrastructure comes forward in the right places and in a timely manner. Having a plan endorsed by the private and public investment will unlock funding for the enhancements to our River Rom, our historic market and the market space, and create a welcoming accessible entrances to the Town via Romford Station and the Romford Ring Road. 1.3 When adopted (with whatever amendments come forward during the formal consultation) this plan will have a direct impact on the lives of more than 23,176 Romford people and indirectly between 262,7031 and 283,400 Havering people over the lifespan of the Masterplan. It is therefore absolutely critical that the plan is scrutinised carefully prior to adoption and then supplemented with detailed operational plans that ensure that Romford remains a distinct but even more attractive place to live, work, and visit. The population will grow whether there is a masterplan or not, so better to plan for growth rather than bear the heavy societal costs of unplanned growth. 1.4 The Romford Masterplan was begun in 2018-2019 under a Conservative Local Government Administration, under a Conservative Government, it will be completed under the Havering Residents Association administration, under a new National Labour Government and with a London Labour Mayor in office. Everyone's fingerprints are on the plan. 1.5 This consultation response is structured around the key Masterplan sections. The comments proceed sequentially in line with the Masterplan's structure although it has been necessary to keep things flowing by sometimes refer to other sections of the Masterplan out of sequence. THE VISION FOR ROMFORD 2.1 The existing draft vision for Romford is set out in 4.1 of the Draft Masterplan: - "Building on its unique character and history, Romford will be a mixed, vibrant and distinct regional town centre. It will consist of a refined retail offer complemented by a rejuvenated market, with a focus on local goods and services, maintaining its role as a major leisure destination, with an enlarged employment offer, an early evening food and beverage offer and new residential community supported by health and school facilities. 2.2 We propose three amendments to this very broad vision. If adopted they will make this a more ambitious and focused vision. i) Put Local People at the Centre of the Masterplan's Vision The vision should provide clarity about whose plan this is, and for whose benefit this plan is being put forward. Whilst it is not possible to list all the stakeholders, a general statement about key beneficiaries could be included in the vision that reminds us that Romford Town exists primarily to serve the local population of existing (and future) local residents, workers, businesses,</p>	<p>The comprehensive and constructive comments submitted by the Labour Group are welcomed. The comments have been considered fully and amendments have been made to the masterplan to add clarification. The suggested greater emphasis on the Market users, stall holders and Market Place as a shared space is also welcomed and wherever feasible text has been amended to reflect this primary theme. The retention and possible expansion of existing blue badge parking has been clarified where changes to the surface parking has been considered. The consultation draft Masterplan had separate Site Guidance for the Market</p>

<p>charities and organisations. ii) Prioritise the Market and Market Space: There is an opportunity here to give more prominence to the regionally historic and unique market and market space by including reference to this asset in the opening sentence? For example: - "Building on its unique character and history, Romford will be a mixed, vibrant and distinct regional town centre with a rejuvenated market and market place at its heart. After all, the market and market space is within the Council's direct control. The Council should focus its resources on the qualitative improvement of the market and market. iii) Improved quality of the Town Centre natural and built environment: The vision also omits reference to improving the quality of the Town Centre natural and built environment. This omission should be rectified with the inclusion of a subsidiary statement as follows: - It will consist of a qualitatively enhanced natural and built environment, a refined retail offer etc., The poor quality of the environment was brought up by so many people with the Council's consultants, during the public consultations that I attended. 2.3 The sum of the proposed changes that we propose would result in a vision that would be broader and more inclusive. "Building on its unique character and history, for the benefit of existing and future local residents, workers, businesses, charities and organisations, Romford will be a mixed, vibrant and distinct regional town centre with a rejuvenated market and market place at its heart. It will consist of a qualitatively enhanced natural and built environment and refined retail offer with a focus on local goods and services, maintaining its role as a major leisure destination, with an enlarged employment offer, an early evening food and beverage offer and new housing, community, health and school provision. "OVER-ARCHING POLICY OBJECTIVES 3.1 This section contains the Labour Group's responses to the Draft Masterplan Consultation's 7 overarching Policy Objectives. Enumerated, they are 1) Space and Landscape 2) Movement and Connectivity 3) Sustainability 4) Inclusivity, Health and Wellbeing, 5) Character and Townscape, 6) Uses and Mix, 7) The Economy. 3.2 However, the biggest omission from this section is a policy objective on Community Safety. It is the Labour Group's considered opinion, based on our collective experiences as ward councillors, that community safety should be an additional over-riding objective. Space and Landscape: Objective SL1: The Labour Group support this objective. Objective SL2: The Labour Group support this objective. We would, however, highlight the needs of residents with physical and learning disabilities who will still need to be able to access the Town Centre by car. They must not be designed out of the Town Centre. Many of the concrete spaces that exist in the Town Centre need to be transformed. Primarily so that rainfall, set to increase as a consequence of climate change, has somewhere to drain into. This is especially the case around Romford's underpasses, near Roneo Corner, and in the area around the River Rom. Objective SL3: Design safe, inclusive, clean, usable and engaging public spaces that are actively managed and take account of on-going management and maintenance requirements. Arguably no public space is intentionally badly designed but if the Council wants to ensure that public spaces remain safe, inclusive, clean, usable and engaging, then it needs to encourage developers to engage with a wider range of Town Centre stakeholders during the planning process. Objective SL4: A right tree in the right place type of strategy would be entirely appropriate. However, the Labour Group share some of the market stall holders' concerns about the practicality of more trees in the market place. Critical mass of stalls is important to viability of the market. There is a balance to be struck between trees and stalls. Careful consideration of the hazards that the wrong type of tree might present to people and property is essential. There is also ample scope to green the roofs and walls of new and existing buildings where it would be practicable to do so. Objective SL5: Transform the market in to the major public civic space in the town centre, that is able to host a range of events and activities. Few towns in the East Region are blessed with the public space that Romford has. The Council is the custodian of this space. It has a moral and financial duty to make the most of the space; to foster community cohesion and inclusion because the costs of not doing so are much higher. Whilst no transformation should be allowed to compromise the viability and vitality of the market it ought to be possible to create a qualitatively better public civic space whilst enhancing the appeal of the market and, at the same time, preserve market capacity. Market traders must be positively engaged in this journey by the Council. Objective SL6: The Labour Group support an objective which would enhance wayfinding through the Town Centre especially in relation to the hospital, and key heritage assets. Objective SL7: The River Rom is an asset which Havering should celebrate so this objective is welcome. The Labour Group urge all relevant bodies to focus on ensuring that new and existing</p>	<p>Place in order to expand on the themes raised.</p>
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sewer connections along the River Rom are maintained clear of debris and not blocked by waste. Following the line of the River Rom with a publicly accessible path, or the provision of panels or information at strategic locations would be celebratory.

Objective SL8: Protecting and enhancing the bio-diversity of the River Rom, its banks and the Town's green spaces is a priority. Work will need to be resourced. The Labour Group feel that the enthusiasm of volunteers can be harnessed through more citizen science projects in conjunction with appropriate organisations such as Thames Chase and the London Royal Zoological Society.

Objective SL9: The River Rom is home to an important eco-system. The Framework Directive was established by the EU to better manage, conserve and restore rivers and lakes. The Labour Group therefore support this objective.

Movement and Connectivity: Objective MC1. The Labour Group support this objective to make the ring road less of a barrier for residents on the periphery of the Town Centre. The Labour Group support improving the underpasses that permit walkers passage from outside the Town into the Town Centre. If it's possible to add more crossing points on the ring road and remove unsightly crash barriers without adversely impacting on pedestrian or driver safety, then the Labour Group support that aim. It is unclear to the Labour Group what "incorporating peninsularisation" of the existing roundabouts means. Perhaps an alternative statement might make intent clearer?

Objective MC2. The principle is easy to support. The devil will be in the detail.

Objective MC3. Romford must maximise the return on the investment into the Elizabeth Line. These are strategic gateways that bring millions of people and their money into Romford Town Centre in the course of a year. The Labour Group therefore urges the council and partners to work much more closely and positively with the Mayor of London, Transport for London, Bus Companies, and other key organisations to improve the capacity, cleanliness and attractiveness of the transport hub for the benefit of residents, workers, businesses and travellers. Whilst the Romford Labour Councillor has been working with the Romford Civic Society and Romford Town Wombles putting volunteer effort into maintaining the ring road raised planters where that can be done the council and partners ought to review operational support for the environment in this part of the Town through more imaginative branding, signing, lighting, greening and cleaning.

Objective MC4: The challenge when delivering this objective will be how to protect and enhance the existing amenities of the residents of Charrington Court, on Atlanta Boulevard, and, depending on the timing of the scheme, of the new residents of a future Bridge Street regeneration scheme. Sensitively done a new station entrance will greatly improve the existing poor environment and help create a stronger sense of place for this neglected area of Romford.

Objective MC5: Ideally a future car park strategy must provide for an improvement in the quality of car park provision so that under-utilised car park provision becomes a thing of the past. Then Romford will compete more strongly with other regional shopping centres.

Objective MC6: The Council must work much more closely with the Mayor of London to protect and improve the bus network for those who live in the outer areas of the Borough. The comfort and safety of people with disabilities using buses (and there are many people with diverse needs) ought to be better addressed.

Objective MC7: This objective is ambitious, rightly so. Many businesses and workers would welcome a north south rapid transit system. Too many workers employed in the industrial areas in the south of Havering are overly dependent on cars for work journeys. Delays on the network undermine productivity. A planned rapid transit system is desirable providing costs can be managed and the route carefully planned.

Objective MC8: The Council, should redouble its efforts to work with the Mayor of London, major employers, schools and colleges to promote active travel to employees, students, and workers. This masterplan shows the way. Delivering qualitative improvements in public transport will be the key to providing viable alternatives to ever-increasing car journeys. However, the needs of people with disabilities must be considered, transitioning from car to alternative forms of active travel are not practicable or reasonable options for some people.

Sustainability Objective S1: The appalling events recently seen in Valencia should be a reminder of why we all need to do our bit to transition to Zero Carbon by 2030, providing the costs of transitioning can be mitigated against. It is noted that the Masterplan identifies funding in the form of a carbon offset fund. There will need to be better marketing of the success of such funds if small businesses and families are to be persuaded to transition successfully in greater numbers.

Objective S2: The Masterplan aligns with the Local Plan, London Plan and National Planning Policy Framework and National Policy on Carbon Reduction, this objective is entirely in keeping with those strategies.

Objective S3: It would be right to bring forward a draft strategy as soon as possible so that residents might understand what this entails. Objective S4: The Labour Group support exploration of the feasibility of creating a local energy company to supply affordable and reliable energy, heat and power to the residents of Romford. The study would need to address governance controls so that it did not become an unaccountable and insufficiently regulated body whose debts might accrue on the Council's balance sheets. Objective S5: The Labour Group believes that there are limits to the extraction of materials required for new development. The Labour Group therefore supports the adoption of the principle of a circular economy providing there are safeguards to prevent the pollution of Romford's watercourses through the release of harmful particulates during recovery processes. Objectives S6 and S7: Covered above. Objective S8: The Labour Group believe there should be a review of the management of the existing allotments within the Romford Town Area. If the Council is going to include this in the Masterplan, it should relate to a national food strategy. Inclusivity, Health and Welfare Objective IHW: The Labour Group believes that the Masterplan does not make sufficient acknowledgement of the role that cultural places such as community spaces, halls, gardens, theatres, and pitches make in promoting health objectives. There is no Strategic Objective that talks about growing the cultural offer for its health benefits. This could be rectified here. IHW3: The Labour Group believe that Developers should seek to minimise noise and light pollution from all developments in, and around the periphery of the Town Centre. Stringent post-construction planning conditions applied to town centre planning consents must be enforced. This will regulate the anti-social activities of occupants of town centre uses. These activities if permitted destroy the tranquillity and rest of existing residents, and new residents. The Labour Group acknowledge the role that religious gardens and churchyards play in offering places of peace and tranquillity however there should also be publicly accessible, secular tranquil spaces for non-religious people. These could be located in parks and perhaps along the river Rom. These could be built into the blue and green strategies. Objective IHW4: All places, where appropriate, should facilitate independent movement for people regardless of age. As many spaces as possible ought to be child-friendly and provide for children with learning and physical disabilities. Within the context of a national economy dependent on a shrinking workforce relative to the number of people not in paid work, the local authority and developers should do more to facilitate their inclusion by working with unions and disability groups to ensure future developments are truly accessible. Character and Townscape Objective CT1 The Labour Group believe that the Council should exercise tighter control of advertising boards, hoardings, shops signs, market awnings, street furniture and other street furniture through the planning and licensing system if necessary, if real environmental improvements are to be achieved. Havering Council departments need to work together to achieve this. On developing a greater sense of character, the Labour Group applaud the Council for completing the character study and for completing the new list of locally important buildings. These documents will be useful development tools. Objective CT2 The Havering Museum is an under-utilised asset which ought to be central to the Council's plans to build brand Romford. It has amazing resources and spaces which could be put to better use to educate and inform the public about Romford's history and heritage. It ought to feature on all signs from the Elizabeth Line and transport hub. Its presence in the Town ought to be better indicated from all neighbouring car parks. The street the Museum is located on could be redesigned to create a space outside the Museum where beverages could be served and people invited to stay longer in the area. Objective CT3 The Labour Group believe that there needs to be a brand for Romford. This is something the Local Authority, the BID and other local organisations, could consider. Objective CT4: Land is a very valuable resource. Land not in use is an opportunity cost and a magnet for crime. The Council cannot afford to have empty surface car parks in the Town Centre. Objective CT5: The Labour Group support this objective. New developments should enhance and reinforce the overall character and townscape of Romford, responding to its history and predominantly low to mid-rise townscape. New developments should be sympathetic to existing buildings which have architectural merit. Buildings with architectural merit and history should be preserved. Objective CT6 Having no plan will not prevent tall buildings from being built in inappropriate places as we have seen under the former Conservative administration that delivered tall buildings outside the Romford Ring Road as well as within it. These buildings set a precedent for building heights. Going forward, all future developments should be considered within the

context and character of their setting and anything that is mid-rise, or 4 storeys or more should be positively encouraged whilst protecting from adverse impacts wherever possible within the context of meeting housing need. Uses and Mix Objective US1 Within the Masterplan (page 21, Fig.0,7) the current uses map shows the market place as parking. The Labour Group urge the Council to amend this map to accurately depict its current use three days a week as a market. We endorse the strengthening of the Town Centre by focusing new retail and other main town centres uses into the core of the town centre. However, the addition of a new Railway station exit on Exchange Street will bring with it pressure to enhance the food and drink offer in this vicinity so it would be wise to plan for it or control it so that the amenities of existing Town Centre residents are not adversely impacted by ad hoc development. Objective US2 Residents enjoy the benefits of a diverse economy which offers food, drink, shopping and pleasing entertainments into the evening. Providing new businesses contribute to the cost of extending services the Labour Group support this objective. Objective US3 and US4 The expansion of a managed cultural offer will provide new work opportunities for Romford's students and workers. Properly managed the new cultural activities will enhance Romford's reputation as an attractive place in which to live, shop and visit. The Labour Group support this objective. Objective US5 The Labour support this objective but because it will drive demand for more food and drink uses in this area, there will need to be a compensatory shift of operational resources to manage cleaning and waste. A designated space for associated delivery bikes will need to be found and managed. Objective US6 and US7 Romford is already overdeveloped with regard to the provision of Childcare places, day nurseries, GP's, Dentists, school places and critical infrastructure so there must be careful scrutiny of all plans bringing forward significant housing numbers. But it is a fact that we need homes of the right size especially for larger families, people who need adapted housing and people on low incomes. Not welcoming housing in Romford will undermine efforts to address the shortage of such homes. Objective US8 The Labour Group supports this objective but meanwhile uses in the town centre must be subject to the same planning and licensing controls as any other uses. Planning consents should place an obligation on occupiers/owners of land to use their best endeavours to ensure security when land/sites are in vacant possession. Having a meanwhile use strategy for a property that has been vacant for longer than 12 months that recognises the risks associated with short term lets and mitigates against the harms that those risks could pose should be seen as a responsible way for developers, freeholders and leaseholders to protect themselves against any liabilities that might arise. The Economy Objectives E1 to E8 the Labour Group agrees with these objectives. The Labour Group believes that the Council should consider bringing forward a new Economic Development Plan for the Borough that seeks to relate Romford to the wider national and regional economy. Section 5.8 The Labour Group note that the Romford Masterplan identifies that an additional 2000 jobs will be delivered in Romford by 2041 and 5.8.2 describes the strategies that will be employed to support Romford's economy. These strategies are welcome. The Labour group would like to see more detail and evidence of commitment to these strategies by major employers of workers in Romford. One of the key drivers of improved productivity is skills training and there is no strategy that addresses this. This is why an Economic Development Plan is necessary. TOWN CENTRE BOUNDARY 6.1 The 2024 Masterplan shows a much extended Town Centre area by enclosing within the plan, a site referred to as Crow Lane. However, the current Romford Metropolitan Town Centre Boundary does not include that site. The Masterplan through its inclusion of the Crow Lane site does not comply with the current local plan. By drawing such an enlarged boundary there is a danger that a precedent is set for the uncontrolled expansion of Romford Town Centre into areas that are primarily residential such as Rush Green or Mawneys. This represents a significant redrafting of the Town Centre boundaries. The Labour Group believe, in view of the land area covered, that such a significant redrafting as this should come through the Local Plan refresh. The Labour Group agree with the principle of housing on this site. 6.2 Additionally, within the area encompassed within the Romford Masterplan Plan, there is a site missing in the middle of the Town Centre, off the Market Place, and including the area where the bus layby is on the ring road and near the Roman Catholic Church of St Edwards. This is an area which is crying out for environmental improvement and its omission ought to be rectified. "3.10.0 Community Safety The Council should consider bringing forward under this overarching policy objective, objectives relating to: - i) The replacement and renewal of the Town's CCTC system



within a stated timeframe. ii) A requirement on all developers to work with new occupiers to ensure the integration of security measures by designing them in. iii) The lessons of Grenfell must be incorporated into new buildings. MASTERPLAN THEMES:

4.1 The decision to group themes (that correlate to the Overarching Objectives) into those that guide delivery 1) of physical infrastructure and interventions and 2) those that direct development and growth is helpful. However, the link between improving and paying for infrastructure and interventions, through the delivery of regeneration projects plus capital investment and grants ought to be made more transparent here.

4.2 There are a range of ambitious projects depicted in Fig.15 Space and Landscape Strategy including the reintroduction of an historic Laurie Square, new Brewery Gardens and a greening programme for the Market Place.

4.3 Section 5.2.2.5 refers to “Key Interventions”. The Labour Group believe that the market interventions that are coming forward ought to be brought together so that all the diverse proposals emerging during the Masterplan consultation are brought together in one prospectus. At the moment, proposals are fragmented throughout the Masterplan for example in 5.2.2.2 The Market, in 5.2.2.5 Key Interventions. A prospectus would be helpful for investors and developers.

5.2.2.5 Remain the primary civic space for the town centre: The Labour Group believe the retention of the market as the primary civic space for the Town Centre is essential and are surprised the Conservatives have not grasped the Masterplan process as an opportunity to strongly assert that. We also recognise that other spaces, such as the front of the current Town Hall and Coronation Gardens, compliment the market as equally important civic spaces. The proposal to recreate Laurie Square near the Town Hall is an opportunity to enhance the quality of the existing links. Opportunities to do this must be explored with private developers if and when they bring forward relevant plans.

5.2.2.5 Continue to accommodate the market and allow for a flexible provision of temporary stalls: A future Romford without a market is unthinkable We hope that the Council will be able to rise to the challenge of getting the right balance between event space and market stalls.

5.2.2.5 Accommodate greening in the form of trees and planting: The Labour Group have already commented on this above.

5.2.2.5 Providing seating and informal spots to stop and dwell, in an attractive and safe environment. The Labour Group recognise there is a need for more seating and urge that more of this should be designed specifically for shoppers, visitors and children with disabilities.

5.2.2.5 Remove car parking in order to be continuously usable and attractive as a civic space: The Labour Group believe this to be politically contentious as surface car park in the market is currently enjoyed and valued by shoppers and retailers alike. The Council is also dependent on the income generated by the surface car park so this proposal.

5.2.2.5 Utilised Infrastructural remnants or marks in the ground can be used to help define and programme the space: The Labour Group believe that whilst these marks may hold great administrative significance for lawyers, engineers or property owners, what shoppers see is just “The Market” and who they hold accountable for its condition – rightly or wrongly is – “The Council”. Joined up work is what is required.

5.2.2.5 Transform under-utilised areas into ecological assets through temporary or permanent soft landscape. The Labour Group support this action providing revenue costs can be minimised.

5.2.2.5 Use the axis running through the market place to divide the large 1 ha area into smaller pockets of space. The Labour Group would like to be assured that the impact of this on the economic vitality and viability of the market has been modelled and the outcome supports the action.

5.2.2.5 Activate the segments with different programmes such as attractive event spaces, stage or fairground: The Labour Group seeks assurance that the information held by the Council and marketing manager demonstrates that this will benefit the vitality and viability of the market?

5.2.2.5 Introduce pieces of a natural landscape in phases until the terrain evolves and can perform a role as part of the wider green corridor, restoring the lost connection between Romford and its rural context: The Masterplan should make explicit that full transformation of the space means the retention of an enhanced market and market place.

4.4 Missing from the strategy is any link to the economy such as providing incentives to market stall holders to undertake training to enhance skills in relation to marketing, visual display of merchandise and customer care skills.

4.5 It is also disappointing that there are no immediate plans to promote awareness of the historical importance of the market especially given that there are expanses of hoardings available in the Town to do this on.

INCREMENTAL IMPLEMENTATION MASTERPLAN SECTION 7.1 This section sets out how the Masterplan content will be delivered. For most people this is the most important issue given the constraints on public funding and 14 years of Conservative

	<p>Government failure to invest in infrastructure. Clearly private sector investment will be critical. The Labour Group therefore applaud the Labour Government for acting to provide a stable economic backdrop focused on growth. We must replicate this at the local level by planning for growth so that Havering and Romford residents can benefit from the raft of funding, grant and investment opportunities that exist. 7.2 As a Labour Group we are pleased that the administration we were part of recognises the value of keeping planning documents relevant and up-to-date. This will help Havering in its bids for funding from the Mayor for London, Government and other agencies. Section 7.4.2 sets out the range of funding opportunities and 7.4.5. equally helpfully sets out a series of Infrastructure Projects required to deliver the Vision set out in the Romford Masterplan. 7.3 Overseeing the delivery of these projects is going to be challenging. There is such a plethora of stakeholders involved in the Town Centre that it is often very challenging for newly elected members and members of the public to establish who is responsible for the delivery of what and when in Romford Town Centre. Whilst the establishment of a delivery board seems essential, the Labour Group believe safeguards must be built in to control costs and provide clear lines of democratic control and accountability. 8.0 CONCLUDING OBSERVATIONS 8.1 The delivery of a Masterplan for Romford is something the Labour Group support. This consultation document produced by Officers after extensive public engagement over a very long time frame, through no fault of theirs, represents the conclusion of a piece of work that was left to languish by the previous political administration which has meant that growth has happened in Romford without reference to a detailed local plan and in an ad hoc manner without harvesting all the benefits that were on offer. We are pleased to play our role in bringing that chaos to an end. "</p>	
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