

**THE LONDON BOROUGH OF HAVERING  
(BRIDGE CLOSE ROMFORD)  
COMPULSORY PURCHASE ORDER No.1 [2026]**

**SECTION 226 (1)(a) AND SECTION 226(3)(a) OF THE TOWN AND COUNTRY PLANNING  
ACT 1990**

**SECTION 13 OF THE LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS) ACT 1976**

**AND**

**THE ACQUISITION OF LAND ACT 1981**

**STATEMENT OF REASONS OF THE LONDON BOROUGH OF HAVERING FOR THE  
MAKING OF THE COMPULSORY PURCHASE ORDER**

**December 2025**

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## Bridge Close, Romford

### 1.0 Introduction

- 1.1 The London Borough of Havering ("the Council") has made The London Borough of Havering (Bridge Close) Compulsory Purchase Order No.1 2026 ("the Order") pursuant to the statutory powers contained in s226 (1)(a) and s226 (3)(a) of the Town and Country Planning Act 1990 as amended ("the 1990 Act") and associated provisions within section 13 of the Local Government (Miscellaneous Provisions) Act 1976 ("the 1976 Act").
- 1.2 This Statement of Reasons ("this Statement") is a non-statutory statement provided in compliance with paragraphs 25 and 196 of the Ministry of Housing, Communities and Local Government ("MHCLG") "Guidance on Compulsory purchase process and The Cichel Down Rules" originally published in October 2015 and last updated in January 2025 ("the CPO Guidance").
- 1.3 The Council's purpose in making the Order, and seeking, if necessary, its confirmation by the Secretary of State, is to enable the Council to acquire all property and other proprietary interests of the land, including (where appropriate) new rights, included in the Order ("the Order Land"), for the purposes of securing the regeneration of Bridge Close Regeneration area in Romford, as is more fully described in [section 5.0] of this Statement. The making of the Order is a means of last resort, noting the Council will continue to engage with all holders of interests in the Order Land, including the interests held by the London Ambulance Service comprised in the in the current planning application for the Scheme.
- 1.4 Planning permission for the development ("the Scheme") is expected in the fourth quarter of 2025 with reference P1765.23, noting Strategic Planning Committee has resolved to grant planning permission on 28<sup>th</sup> August 2025. Following the grant of planning permission, which is expected in December 2025, it is anticipated that two applications will be prepared to vary the planning permission. The first application will be submitted under Section 96a of the Town and Country Planning Act (1990) for non-material amendments to alter the approved description of development on the planning permission. The second application will be submitted under Section 73 of the Town and Country Planning Act (1990) for Minor Material Amendments to the approved drawings and supporting information in order to retain the LAS in situ. These applications are expected to be granted by September 2026. The variations to the planning permission would result in a loss of residential units, loss of affordable residential units, loss of flexible health centre / commercial floorspace, loss of public open space and would require a redesign of phase 2 of the Scheme. This will be referred hereafter as "the Varied Scheme".
- 1.5 The Bridge Close regeneration area lies within Romford Town Centre Housing Zone and so forms part of the wider Mayor of London's Housing Strategy, which introduced Housing Zones as a new way to deliver large numbers of new homes in areas of London with high development potential. The Greater London Authority ("the GLA") launched the Housing Zone Prospectus on 30<sup>th</sup> June 2014. The purpose of the Housing Zones programme is to increase housing supply by accelerating and/or unlocking development.
- 1.6 The Order is being submitted to the Secretary of State for confirmation pursuant to the Acquisition of Land Act 1981. If confirmed by the Secretary of State, the Order will enable the Council to acquire compulsorily the land and new rights included in the Order.
- 1.7 The map to the Order included at Appendix A ("Order Land") identifies the land proposed to be acquired (coloured [pink]) and the land on, over or under which new rights are to be created and acquired (coloured [blue]).

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- 1.8 Appendix B to the Order ("Order Schedule") lists owners, lessees, tenants and occupiers of the Order Land, so far as known. In addition, it lists other parties with a qualifying interest in the Order Land as defined by section 12(2) Acquisition of Land Act 1981.
- 1.9 Including unregistered land in the ownership of the Council as Highways Authority, the ownership of freehold and long leasehold interests by the Council is 70% by area.
- 1.10 Ardent Management Limited ("Ardent"), the Council's appointed property surveyors, commenced negotiations for the acquisition of third-party interests in the Order Land in 2016. To date the Council and its development partners have acquired [46 freehold interests and 1 long leasehold interest] out of a total 117 registered property interests] in the Order Land. By number of property interests (as opposed to area as cited as 70% above), 79% of the freehold and long leasehold interests in the Order Land are owned by the Council. This 79% comprises approximately 38% residential properties and approximately 16% commercial properties, the remaining 47% being made up of public or unregistered land that is in council ownership. Notwithstanding the extent of the Council's ownership of the Order Land and despite years of negotiations, the only way to ensure the timely delivery of the Scheme is via the Council's intervention and the use of its compulsory purchase powers.
- 1.11 The Scheme proposals have been developed with residents, businesses and the wider community through multiple rounds of consultation dating back to 2018, further details of which are set out in section [4.0] below.
- 1.12 A masterplan approach has been adopted for the Scheme. Through the design development process, and community engagement, a series of strategic principles for the masterplan have been articulated, tested and refined. These include the following:
- Creating a new Romford quarter;
  - Creating a place to live, providing a range of residential types and tenures, along with workspaces and retail spaces;
  - Revealing the historic landscape;
  - Creating a neighbourhood where cycling and walking are promoted, improving connectivity and valuable open space and play areas for the wider community;
  - Establishing an east-west connection including a critical pedestrian and cycling link towards the Town Centre and Romford station;
  - Responding to existing and emerging context including the existing conditions of Waterloo Road and Oldchurch Road; and
  - Underpinning proposals with an understanding of deliverability, including phasing strategies that include relocation of retained uses within the site.
- 1.13 The Council consider the Scheme and related planning permission, which is expected in the fourth quarter of 2025 (planning reference P1765.23) following a resolution to grant planning permission at London Borough of Havering's Strategic Planning Committee on 28 August 2025, and the Order to fully accord with, and further the objectives of, the proposed Masterplan and Design Code. Further details of the Order Scheme are set out in Section [5.0] below.
- 1.14 The Scheme will deliver up to 1,070 residential dwellings, with 35% being affordable housing units comprising a mix of tenures, comprising 70% shared ownership and 30% social rent tenures, to support local housing needs and helping meet the Borough's (and London's) urgent housing need. The Scheme includes 5,956 sqm of commercial floor space including office and flexible workspace, retail use, professional services and leisure use. Community facilities, of up to 6,970 sqm will be provided including a three-form entry primary school and nursery, a flexible health centre / commercial unit and a community

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centre. Vital infrastructure will be delivered as part of the Scheme including a new pedestrian/cycle bridge across the River Rom. The Havering Islamic Cultural Centre (HICC) currently located at Bridge Close will be relocated to a new town centre site in order to ensure the services and benefits it provides to the local and wider East London Islamic community are preserved.

- 1.15 The Varied Scheme comprises up to 896 units in total of which 35% of the total number of habitable rooms will be affordable housing. This equates to a reduction of up to 174 residential units from the original Scheme.
- 1.16 The provision of residential development will assist in addressing the housing shortfall in the Borough and respond to housing needs, whilst the provision and relocation of a range of commercial and community uses will help deliver new employment and social infrastructure to meet the needs of the wider community and Romford town centre.
- 1.17 The Council is satisfied that there is a compelling case in the public interest for it using its powers of compulsory acquisition for this purpose. The Scheme fits within the planning framework for the area, accords with the Development Plan at all levels and advances the objectives of the Plan, meet and advances the policies of the NPPF and will make a significant contribution to the achievement of the promotion or improvement of the economic, social or environmental wellbeing of the area, and satisfies the other matters set out in paragraph 107 of the CPO Guidance.

## **2.0 Background and Scheme Evolution**

- 2.1 The Scheme is based in Romford Town Centre, the administrative centre for the London Borough of Havering. The town centre has significant potential for economic growth with an easily accessible primary retail area and strong transport links. The site has an excellent Public Transport Accessibility Level (PTAL) of 6a. Romford Rail Station is located approximately 200 metres to the northeast of the site and provides Transport for London (TfL) Rail services to Brentwood and London Liverpool Street (with journey times of 17 minutes), London Overground services to Upminster and National Rail services to Southend Victoria. In addition, Romford Station is part of the Elizabeth Line. This transport infrastructure will enable thousands of additional homes and jobs, encourage new enterprise and attract greater investment.
- 2.2 Bridge Close is currently, in large part, a fragmented and poorly maintained and dated industrial estate mostly built in the 1950s and 1960s in multiple ownership, which developers for many years have unsuccessfully tried to assemble for development. The Order Land is currently occupied by mixed industrial, warehouse and ancillary units, an ambulance station, Islamic Cultural Centre and a number of terraced residential properties to the front of the site. 222-226 South Street, the site where it is proposed to relocate HICC, is situated to the southeast of Bridge Close and comprises a former builder's merchant premises and car park, last used as a restaurant, retail units and gymnasium. The owner of the site is considering its redevelopment in the short to medium term.

### **The Purpose of the Council Making the Order**

- 2.3 The Council's vision for the Scheme builds on the site allocation of the core of the site in the Romford Area Action Plan 2008 and on proposals set out in the Romford Town Centre November 2015 Development Framework and wider local, regional and national planning policy, including the NPPF (2024), London Plan (2021) and Havering Local Plan (2021).

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- 2.4 The Council has been consistent in promoting and progressing its vision to transform Bridge Close, currently a declining, under occupied, light industrial estate with a degraded environment. It is a key regeneration site located on the edge of Romford town centre, and close to the railway station. The Council's ambitious regeneration objectives are for a residential led, mixed use development delivering up to 1,070 new homes (including genuinely affordable housing), key social infrastructure, including a new school, a health facility, and high quality public realm improvements. Pedestrian and cycle routes both within and connecting the new community to Romford Town Centre and public transport nodes at Romford Station will be provided, including a new bridge over the River Rom, which will be revitalised as a watercourse. The development will also deliver commercial and affordable employment space.
- 2.5 The Council's vision is predicated on lifting the quality and aspirations of the estate (and wider area) and thereby arresting the decline in the area. Demographic research suggests that while 86% of residents of Havering are economically active, higher than Greater London and England as a whole (79%)<sup>1</sup>, high levels of deprivation exist within Bridge Close and its surrounding environs (assessed as 500 metres around the Order Land)<sup>2</sup>. The proportion of the population who reside within the most deprived quintile within the area (24%) is higher than within Havering (8%), Greater London (17%), and England as a whole (20%). Overall, 100% of the population within the assessed area reside within the top four deprivation quintiles, which is considerably higher than for Havering (78%), Greater London (89%) and England (81%)<sup>3</sup> as a whole.
- 2.6 The area in and around Bridge Close is also affected by antisocial behaviour and criminal activity. Data from the Metropolitan Police, in the 12 months from September 2024 to August 2025, records 29 serious incidents on or near Bridge Close of which approximately 14% relate to violence and sexual offences, 38% to burglary, robbery and other theft with the remaining 48% comprising drugs offences, violent crime, anti-behaviour and public order offences<sup>4</sup>. In the period from December 2022 to date, three cannabis farms were identified and closed in Bridge Close and a tenant vacated on suspicion of unlawfully hosting multiple occupiers and users of Class A drugs. Members of the Council's Planning and Public Protection Enforcement team regularly report of material fly tipping and abandoned vehicles on site.
- 2.7 The location of Bridge Close and its proximity to commuter links and retail uses, have resulted in the Order Land being allocated for residential-led redevelopment and it was declassified as strategic employment land in the 2008 Local Development Framework (this was endorsed by the 2015 Havering employment land review produced as evidence for the new Local Plan).
- 2.8 There is a significant need for housing and regeneration in the area and the current uses are inappropriate in this location and fail to meet the Council's regeneration objectives. The current uses also discourage public realm activity which can lead to underutilised and dead spaces, reduced personal security and an increased risk of crime.
- 2.9 The Council considers the comprehensive development of Bridge Close, an underutilised brownfield site, will enable the creation of a vibrant new residential-led mixed-use quarter of Romford where people will wish to live, work and play. The development will also provide environmental improvements to the River Rom, including a new bridge, which will provide

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<sup>1</sup> Office for National Statistics Annual Population Survey 2021.

<sup>2</sup> Demographic analysis in the Equalities Impact Assessment considers an area of 500 metres around the CPO Red Line Plan boundary of the Bridge Close Regeneration site.

<sup>3</sup> The ONS 2020 mid-year population estimates and MHCLG 2019 Indices of Multiple Deprivation

<sup>4</sup> Havering Borough Council (Enforcement, Planning & Public Protection), London Metropolitan Police

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a critical pedestrian and cycling link to Romford bus and train stations, thereby enhancing east-west connections within the Town Centre.

- 2.10 In order to facilitate the regeneration of Bridge Close it will be necessary to relocate HICC, which plays an important role in the East London Islamic community and also undertakes a range of charitable activities that benefits the local community generally. It is important that HICC remains in an easily accessible location in Romford Town Centre, but suitable alternative sites in the town centre are extremely limited. Following a lengthy search, an alternative site at 222-226 South Street has now been identified and has been agreed by the Council and HICC as being the only suitable off-site relocation opportunity that is suitable and meets HICCs needs. Although 222-226 South Street is occupied by a number of business occupiers, its current owner has aspirations for development in the short to medium term, and the occupiers either hold short term leases, or leases with break clauses that permit early development.
- 2.11 In January 2023, HICC met with the LPA to discuss proposals to develop 222-226 South Street for its use. Following the meeting the LPA confirmed that HICC's use was acceptable in principle, subject to scale and providing suitable infrastructure. Taking account of the LPA's feedback, HICC has submitted a pre-application advice request for a detailed development proposal. It is understood that pre-application discussions are ongoing and that the HICC intends to submit a formal planning application once the outstanding issues have been resolved.
- 2.12 HICC's relocation to 222-226 South Street will protect the important role it plays in the community and allow that role to be expanded and enhanced to meet the needs of the growing local Islamic population.

### Scheme Evolution

- 2.13 In response to its regeneration priorities, the delivery of the Scheme has been a key ongoing policy objective of the Council. Bridge Close is occupied by mixed industrial, warehouse and ancillary units, an ambulance station, an Islamic Cultural Centre and a number of terraced residential properties fronting Waterloo Road and Oldchurch Road. The site was and continues to be in multiple ownerships and for some years one of the main landowners had been attempting to bring forward a comprehensive redevelopment.
- 2.14 The 2008 Local Development Framework declassified the site as strategic employment land and was subsequently endorsed by the 2015 Havering employment land review produced as evidence for what was the emerging new Local Plan at that time. The Romford Development Framework, approved by Cabinet in 2015, identified Bridge Close for comprehensive redevelopment with the potential to provide a significant quantum of new homes.

On 15th June 2016, Cabinet agreed to the principle of developing the land at Bridge Close in accordance with planning policy and approved the vision for a new residential neighbourhood supported by planning guidance for the comprehensive development of the site with a focus on new residential development, a new east-west route linking the site to the station and environmental improvements to the River Rom. Cabinet also authorised the negotiation of suitable arrangements with developers to deliver the Council's vision and to commence the process of acquiring land. Cabinet agreed to enter into an Overarching Borough Agreement ('OBA') with the Greater London Authority ('GLA') to accelerate housing delivery. Prior to the Cabinet decision, in March 2016 the GLA designated Romford Town Centre a Housing Zone for the delivery of up to 3,304 new homes of all tenures. Funding of £34.9 million was indicatively allocated to the zone to unlock and/or accelerate

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housing and to regenerate the area. Following this designation, the GLA and the Council entered into the OBA in September 2016, which formalised the indicative allocation.

- 2.15 The business case and financial model underpinning Cabinet's decision of 15<sup>th</sup> June 2016 anticipated the delivery of the following:
- 1,070 new homes (including affordable homes)
  - A 3 form entry primary school
  - A local health facility
  - Commercial floor space, likely to be flexible workspace and small retail/ leisure.
  - A new pedestrian and cycle bridge from Bridge Close to near Romford station
  - Environmental improvements to the River Rom
- 2.16 On 15<sup>th</sup> November 2017, Cabinet approved the establishment of a dedicated special purpose vehicle with delegated authority to enter into all relevant legal arrangements to bring forward a joint venture ('JV') partnership with a private sector partner.
- 2.17 The JV, Bridge Close Regeneration LLP ('BCR LLP'), was established on 28<sup>th</sup> February 2018 in the form of a Limited Liability Partnership between London Borough of Havering (50% interest) and a Special Purpose Vehicle ('SPV') owned by Savills Investment Management Limited and First Base Limited (50% interest). A comprehensive suite of project documents was completed and an initial business plan and funding envelope were adopted to underpin the full delivery of the Scheme. Significant property interests were transferred to the JV and the commercial principles for the potential use of the Council's compulsory purchase powers as a means of last resort was enshrined in the agreements.
- 2.18 On 28<sup>th</sup> February 2018 the GLA approved a grant totalling £12.4 million to enable the Council to purchase affordable housing from BCR LLP. A Borough Intervention Agreement ('BIA') was entered into between the GLA and London Borough of Havering in respect of the £12.4 million Housing Zone grant funding in March 2018. The BIA also set out the Council's obligations to procure the delivery of non-housing outputs, including the school, the health centre and a quantum of commercial floor space.
- 2.19 In accordance with the adopted Business Plan and relevant policies, by June 2018 BCR LLP had appointed a comprehensive design and technical team to progress the development of the planning application for Bridge Close and by September 2019, proposals had been developed in substantial form for the submission of that planning application. Similarly, land assembly activity and local engagement continued, leading to a number of additional commercial and residential properties being acquired.
- 2.20 In the early part of 2020, a deterioration in the housing market, exacerbated by the outbreak of the Covid-19 pandemic, together with a significant increase in build costs began to have an impact on the commercial viability of the Scheme. A number of strategies were proposed to deal with the issue, but they were unable to overcome all of the challenges to viability or, without further intervention, to generate the returns necessary to meet the hurdle rates of the SPV and the potential requirements of third party funders. As such, the SPV, led by Savills Investment Management, advised that it was unwilling to raise further funds beyond the funding commitments set out in the approved Business Plan until the problems with viability were resolved.
- 2.21 In view of the practical difficulties of implementing the JV business plan, and being mindful of the Council's commitment to bringing about a comprehensive redevelopment of Bridge Close, on 16<sup>th</sup> September 2020, Cabinet approved the proposal for the Council to acquire the interest held by the SPV in BCR LLP. In October 2020 the Council completed the acquisition thereby safeguarding the regeneration of Bridge Close.



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- 2.22 On 16<sup>th</sup> December 2020, Cabinet approved a proposal for the Council to wholly fund and deliver the regeneration of Bridge Close through BCR LLP. The budget for funding was endorsed by Full Council on 3<sup>rd</sup> of March 2021.
- 2.23 A team of masterplanners, architects, engineers and technical advisors were subsequently assembled to take the Scheme forward. Having regard to the passing of time and changes to planning policy and regulatory requirements, material amendments were made to the Scheme in favour of centralised, site-wide district heating, enhanced fire safety regulations, and a number of other design matters. Public consultation events were held in October 2022 and further consultation continued with the Local Planning Authority ('LPA') and other stakeholders.
- 2.24 In March 2021, to ensure delivery of the regeneration at Bridge Close, the GLA approved<sup>5</sup> the reprofiling of £12.4 million in grant already committed to support the Council in the buy-out of their JV partner, land assembly and other related costs to facilitate the development of the Scheme. The GLA also granted approval to extend completion dates in the Romford Housing Zone for the Bridge Close intervention to 31 March 2029.
- 2.25 In August 2023, the Council's Cabinet approved the, in principle, inclusion of additional land at 222-226 South Street in the Bridge Close CPO, as a last resort, if the site could not be acquired by agreement. 222-226 South Street has been identified as the only site suitable for the purpose of relocating the HICC, which currently occupies land and buildings at Bridge Close. The inclusion of 222-226 South Street was considered in the approval by Cabinet of the Bridge Close Regeneration LLP Business Plan 2024-2025 on 7<sup>th</sup> February 2024.

### **3.0 Location and Description of the Order Land**

- 3.1 The main part of the Order Land measures approximately 3.94 hectares in total and is broadly rectangular in shape, as illustrated in the plan at Appendix A. To the south and west of the Order Land is the Romford Ring Road (Oldchurch Road (A1251) to the south and Waterloo Road (A125) to the west), while to the east of the site is the River Rom. To the north the Order Land is bounded by the railway and adjacent Network Rail land. The 222-226 South Street site is situated to the southeast of the main site, on the south side of Oldchurch Road (A1251) and on the west side of South Street.
- 3.2 The Order Land is currently accessed from the south-west, off the Old Church Roundabout. Historically, the only other public access point into it was an informal pedestrian footbridge across the River Rom on the eastern boundary of the Order Land, from Regarth Avenue. The footbridge has been closed owing to health and safety concerns.
- 3.3 The Order Land currently comprises a range of industrial and commercial buildings extending to between one and two commercial storeys in height (Class Eg, B2, B8, and Sui Generis uses), together with residential properties along the Waterloo Road and Oldchurch Road frontages, an ambulance station and the HICC.
- 3.4 222-226 South Street has an area of circa 0.32 hectares and is of irregular shape, as illustrated in the plan at Appendix A. The site is situated circa 100 metres to the southeast of Bridge Close, at the junction of South Street and Thurloe Gardens (A1251). The site is bounded by South Street to the east, the River Rom to the west, commercial premises to the north and commercial and residential premises to the southeast.

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<sup>5</sup> GLA Decision DD2507 pursuant to prior Decision DD2215.

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- 3.5 222-226 South Street is currently accessed from Thurloe Gardens and comprises a single storey, locally listed, former builder's merchant premises (last used as a restaurant), a range of other single and two storey commercial premises and a car parking area.
- 3.6 The Order Land is located within Romford Town Centre, defined as a Metropolitan centre and an Opportunity Area (OA) with potential for 5,000 new homes and 500 new jobs by 2041 within the London Plan. Existing neighbouring land uses to the main Bridge Close site include a mix of residential and commercial development to the east, south and west of the Order Land, including a Lidl supermarket to the east. Queen's Hospital is located approximately 0.2 km to the south-west of the Order Land. Romford Station is located immediately north of the Order Land.
- 3.7 The boundary of the Order Land is shown edged red on the Order Map. The land coloured [pink] identifies the land over which the Council seeks to compulsorily acquire a number of third-party freehold and leasehold interests ("the [Pink] Land") in order to deliver the Scheme. The land coloured [blue] identifies the land over which new rights over land are proposed to be created and acquired compulsorily ("the [Blue] Land") to facilitate the delivery of the Scheme. These rights are for [crane oversailing, to erect and use scaffolding, carry out highway and landscaping works, storage of plant and equipment, and access]. Further information on the rights sought over particular parts of the Order Land is provided at paragraph [11.0] below.
- 3.8 Development of the Order Land requires the acquisition of a number of property and land interests. Ardent have been appointed to provide specialist advice to the Council in respect of land assembly and the promotion of a CPO, including land referencing. Ardent have also compiled property cost estimates for all the acquisition sites including valuations and additional compensation assessments.
- 3.9 The land referencing undertaken by Ardent has identified 111 registered freehold interests and 6 registered leasehold interests within the Order Land which are affected by the CPO. With the exception of other land such as adopted highway and verge, the identified property interests include 16 premises in business use, 4 premises in religious/community use, 2 properties in mixed use, 37 residential properties, 1 electricity substation, and 1 pumping station.
- 3.10 As at September 2025, the Council has successfully concluded the acquisition of 47 legal property interests (46 being freehold interests and 1 being a long leasehold interest – as a number of properties are made up of multiple legal freehold interests, this comprises 33 residential properties and 8 properties in business use) has been successfully concluded. The Council now therefore owns or controls 70% of the freehold interests in the Order Land by area.
- 3.11 For the remaining property interests, offers have been made for the acquisition of 17 freehold interests (including the freehold interest in 222-226 South Street) and 2 long leasehold interests (8 properties in business use, 5 residential properties and 1 other land interest) within the Order Land.
- 3.12 If the Order is confirmed, the Council intends to use its CPO powers to acquire land interests that it is unable to secure through private treaty negotiations.
- 3.13 Full details of the ownership of each interest in the land and the new rights comprised in the Order are contained in the Order Schedule (which can be inspected at the addresses given in Section [20.0 below] of this Statement). In respect of the Pink Land the Council is seeking the power to acquire all interests in the land unless expressly stated in the Order Schedule.

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### 4.0 Consultation and Engagement

- 4.1 Residents, businesses and other stakeholders have been consulted extensively about the regeneration of the area as a whole and on the redevelopment of the Order Land, in particular.
- 4.2 The planning application was submitted following extensive pre-application engagement with officers at the Council and the GLA. These conversations date back to early 2017, with most recent pre-application discussions taking place in November 2022.
- 4.3 A Planning Performance Agreement was entered into agreeing a number of pre-application meetings and workshops with officers at the Council leading up to the submission of the application.
- 4.4 The Scheme was presented to the Council's Quality Review Panel on three occasions: once in December 2018; once in June 2019; and most recently in September 2019. These sessions focused on the overall masterplan framework and parameter plans.
- 4.5 The Scheme has also been presented to the Council's Strategic Planning Committee (SPC) in January 2019, July 2019, September 2019 and most recently in October 2022.
- 4.6 The Statement of Community Involvement (SCI) has been prepared by Cascade Communications, the development proposals for the site have been discussed extensively with the public. In total, five public consultation events have been held (September 2018, November 2018, May 2019, September 2019 and in October 2022 at a range of venues including on site and within the Romford town centre shopping centres.
- 4.7 The consultation for the proposed redevelopment of Bridge Close has included:
- Individual meetings with local groups and stakeholders;
  - Nine rounds of public consultation events at different venues in Romford Town Centre;
  - Approximately 2,073 residents and stakeholders were engaged during a four-stage consultation from September 2018 to October 2022;
  - 27 hours of community consultation events;
  - 38,000 invitation letters to residential and commercial properties in the surrounding area, including over 50,000 emails to publicise the events;
  - A dedicated project website;
  - Over 116,224 residents viewing social media posts and 11,000 questions answered by respondents online; and
  - Online and paper questionnaires to encourage responses.
- 4.8 As a result, the application has been informed by feedback from 506 questionnaire responses, 30 hours of public consultation carried out over six separate public consultation events, meetings with community groups, councillors and other stakeholders between 2018 and the point of submission.
- 4.9 The consultation process and methodology included:
- **Translations:** Language and braille translations of the consultation newsletters were offered to residents and members of the public.
  - **Voice recording:** A voice recording was produced and issued to community and local groups in addition to the consultation invitation.

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- **Social media advertisements:** These were run in the days leading up to the consultation events, targeted at both a wide range of audiences and groups which fall under protected characteristics categories.
- **Newsletters:** Over 8,000 physical newsletters issued to households and businesses in Romford.
- **Questionnaires:** Feedback forms were provided at the in-person events and online on the website to enable residents share their thoughts on the proposals.
- **Consultation events:** Both in-person and online events were organised to give people flexibility and provide residents the opportunity to be involved in the consultation process, view the plans in details and speak directly with members of the project team.
- **Email notifications** to groups and stakeholders: Notifications were issued to identified local stakeholders and groups encouraging them to participate in the consultation process.

- 4.10 Feedback from attendees indicated significant support for the provision of the proposed community uses, the new links with the Town Centre, new opportunities for jobs and opening up of the River Rom.
- 4.11 Where potential concerns were highlighted by the public, the project team worked hard to try and address these where possible.
- 4.12 The consultations sought to gauge the support of local residents and stakeholders to the principles in the Housing Zone and Planning Framework. Community feedback on the proposals for Bridge Close have been largely supportive. A breakdown of specific feedback and responses is set out below.

### Community facilities

- 4.13 The feedback from the consultation events showed that 75% of those who responded would like to see community facilities as part of the proposals. A new healthcare centre, primary school and community centre have been proposed within the submitted planning application. The HICC would have opportunity to take space within the new community facility, should it be their preference to do so, noting that BCR LLP is actively assisting the HICC in securing alternative premises at 222-226 South Street to provide the existing facility with options and flexibility in terms of continuing its operations within Romford. HICC has confirmed that it does not consider an on-site relocation to be viable and is concerned that its use will conflict with the proposed new residential development.
- 4.14 During the October 2022 consultation, a key point of discussion were concerns from HICC members as to a lack of reference to the organisation on the consultation materials and a lack of clarity on how their existing facility would be re-provided. The Applicant's representatives assured HICC members that discussions were ongoing and the relocation of HICC was a key element of the proposals.

### New links

- 4.15 66% of respondents supported new links within the town centre. The new east-west link, across the River Rom through to Waterloo Road, would provide quicker and safer access to Romford Station and the town centre.
- 4.16 The site currently suffers from poor accessibility as it is constrained by the ring road, railway line and river. The proposals for Bridge Close would create new links and a gateway into the town centre. Opening-up new links across the site would enable easier access from the south and west of the site, particularly to Romford Train Station and Town Centre.

## **Bridge Close, Romford**

### **River Rom**

- 4.17 The current footbridge over the river was underused and felt unsafe to many residents, noting that post-consultation, the bridge has been closed for health and safety reasons since circa 2023. 60% of respondents to the consultation were in favour of revitalising the River Rom.
- 4.18 Acknowledging the importance of the River Rom, the proposals comprise restorative works to the River Rom, including naturalising the flow of the river and providing additional landscaping and planting of a range of species along the banks to encourage biodiversity. A new pedestrian and cycle bridge over the River Rom and a public route will be created along the river for use by pedestrians and cyclists and will include informal play and communal amenity space transforming the area into an open, attractive and active public space.

### **Parking and transport**

- 4.19 Concerns were expressed about issues relating to parking or traffic in the town centre, with respondents expressing a desire for increased accessibility to the town centre and public transport.
- 4.20 In response to the feedback, the proposals will include:
- Car-light development.
  - Dedicated disabled parking in an accessible location close to the new health centre.
  - Increased accessibility to town centre and train station to limit need for vehicles.
  - Traffic management measures.
  - Implementation of a Travel Plan which will promote alternatives to the car use for both residential and commercial occupiers.
  - Increased use of alternate forms of travel. E.g. Provision of safe and accessible cycle racks or lockers and cycle paths.
  - Provision of car club spaces to promote the sustainable use of motor vehicles.
  - School Street
  - Independent, self-contained parking facilities would be provided for HICC at 222-226 South Street

## **5.0 Order Scheme**

- 5.1 The following sections describe the full and outline elements of the hybrid planning application comprising the Order Scheme in more detail. The overall Scheme is delivered in three phases.
- 5.2 A hybrid planning permission is expected in the fourth quarter of 2025 with planning reference P1765.23. Full details for were submitted for Phase 1 as part of the hybrid application, comprising Plots A and B. Specifically, this element of the hybrid application includes:
- Erection of two buildings on Plot A and two buildings on Plot B to provide 383 residential units (Class C3).
  - 1,911 sqm (GEA) of commercial floor space (Class E use).
  - A 4,202 sqm (GEA) three form entry primary school and nursery (Class F1(a)).
  - Provision of pedestrian/cycle bridge.
  - New vehicular and pedestrian arrangements.

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- A new public square and civic square.
  - New public realm works.
  - Associated infrastructure and works incidental to the proposed development.
- 5.3 The outline elements covered the remaining development parcels with the planning application seeking approval for the following:
- Up to 687 residential dwellings (Class C3).
  - Community floor space of up to 2,768 sqm (GEA), comprising a flexible health centre / commercial unit (Class E / F1 / F2) and a community centre (Class F1 / F2).
  - Up to 4,045 sqm (GEA) commercial floor space (Class E use), comprising office and flexible workspace, retail use, professional services and leisure use.
  - Together with associated infrastructure, alterations to and provision of new vehicular and pedestrian access points.
  - Public open space, including a riverside walk.
  - Car, motorcycle and bicycle parking spaces and servicing spaces; and
  - Other works incidental to the proposed development.
- 5.4 The Varied Scheme comprises up to 896 units in total of which 35% of the total number of habitable rooms will be affordable housing. This equates to a reduction of up to 174 residential units from the original scheme. It also includes the removal of the flexible health centre / commercial uses from Plot C1 and appropriate mitigation in the form of alternative health space in a future phase or an appropriate financial contribution will be provided.
- 5.5 As set out in the Development Management Procedure Order (2015), details will be submitted in relation subsequent phases for approval with respect to the following reserved matters:
- **External Appearance** - the aspects of a building or place within the development which determines the visual impression it makes,
  - **Landscaping** - the treatment of land (other than buildings) for the purpose of enhancing or protecting the amenities of the site and the area in which it is situated, for example through the planting of trees or hedges or provision of gardens, courts and other amenity features.
  - **Layout** - the way in which buildings, routes and open spaces are provided within the development and their relationship to buildings and spaces outside the development.
  - **Scale** - the height, width and length of each building proposed in relation to its surroundings.
- 5.6 In seeking to demonstrate the deliverability of the proposed masterplan approach a set of Parameter Plans have been prepared, which will become approved drawings. These will inform future reserved matters applications for the remaining parts of the site and include the following:
- Parameter Plan 1: Access and Movement (Drawing No. 1396-FPA-ZZ-ZZ-DR-U-16005 03);
  - Parameter Plan 2: Development Plots (Drawing No. 1396-FPA-ZZ-ZZ-DR-U-16006 02);
  - Parameter Plan 3: Building Heights (Drawing No. 1396-FPA-ZZ-ZZ-DR-U-16007 02); and
  - Parameter Plan 4: Open Space Parameter (Drawing No. 1396-FPA-ZZ-ZZ-DR-U-16008 02).

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- 5.7 Further details pursuant to future reserved matters submissions for Phases 2, 3a and 3b are contained within the Design Code submitted with the application. The illustrative masterplan and phasing is set out in the plans below.



Figure 1. Order Land Illustrative Masterplan, Bridge Close, Romford





**Figure 2. Order Land Construction Phasing**

- 5.8 The intention is for the development to be phased, which will allow the existing community use undertaken by HICC to remain operational during the early part of the construction works until such time as the relocation of the HICC has taken place. The new community facility will be delivered in Phase 3a within Block D1. The existing HICC facility (at 91 Waterloo Road) is located within Phase 3b and would be retained until Block D1 has been fully completed and ready for occupation.
- 5.9 Further to details set out in 1.4 and 5.4 above, the Varied Scheme would allow for the London Ambulance Service to continue operating from existing premises. Appropriate arrangements have been made to ensure continuity of service throughout the delivery of Phase 1 of the Scheme and in perpetuity

## 6.0 Planning Policy Context

- 6.1 The following paragraphs summarise how the Scheme meets key national, regional and local planning policies and supplementary planning policy objectives for the purpose of paragraph 76 of the MHCLG Guidance.

### National Policy

- 6.2 The National Planning Policy Framework ("NPPF") was published in December 2024 and replaces the previous national planning guidance. The NPPF sets out the Government's



economic, environmental, and social planning policies and is a material consideration in the consideration and determination of planning applications.

6.3 The following summarises some of the key national level policies set out in the Framework:

- At the heart of the NPPF is a presumption in favour of sustainable development which should be pursued in a positive way (Paragraph 10).
- The Council's latest authority monitoring report (AMR) (2023-2024) states that LBH is only able to demonstrate a housing land supply of 2.9 years (including 20% buffer). The Council is therefore unable to demonstrate a 5 year supply of housing land which consequently means that the tilted balance is engaged in line with Paragraph 11d of the NPPF. Consequently, proposals in accordance with development plans should be approved unless "adverse impacts would significantly and demonstrably outweigh the benefits" (Paragraph 11).
- Design quality should be considered throughout the evolution and assessment of individual proposals highlighting the benefits of early discussions between applicants and interested parties (Chapter 12).
- Paragraph 78 identifies the importance of a Local Authority demonstrating a five-year supply of deliverable housing sites, with the appropriate buffer.
- Policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions (Paragraph 124).
- Planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land (Paragraph 125(c)).
- Policies and decisions should support development that makes efficient use of land, considering the need for different types of housing/development, availability of land, the capacity of infrastructure, the character and setting of a particular area and the importance of design (Paragraph 129).
- The creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve (Paragraph 131).
- Planning policies and decisions should ensure that developments function well and improve the quality of an area over the development lifetime, area visually attractive, sympathetic, focus on a sense of place, optimise sites and create places that are safe, inclusive and accessible (Paragraph 135).

### Regional Policy

6.4 **London Plan 2021**

6.4.1 The London Plan was adopted in March 2021. Policy H1 of the London Plan relates to increasing housing supply and Table 4.1 sets the ten year target for net housing completions that each local planning authority should plan for. For the Council, the ten-year housing target has been increased to 12,850 dwellings across the ten-year period. This equates to an annual target of 1,285 homes.

6.5 The site is located within the Romford Opportunity Area as designated under the adopted London Plan. The London Plan promotes growth in the identified opportunity areas and provides an indicative housing and employment capacity for the opportunity area to provide 5,000 new homes and 500 new jobs.

## Bridge Close, Romford

- 6.5.1 London Plan Policy H4 sets a strategic target for 50% of all new homes delivered across London to be genuinely affordable. The policy aims to achieve this by delivering at least 50% affordable housing on public sector land, where there is no portfolio agreement with the Mayor. Where an application does not meet the requirements in terms of the target % provision and target tenure split, then it must follow the Viability Tested Route.
- 6.5.2 The London Plan is also supported by a number of Supplementary Planning Guidance (SPG) documents including the following:
- Affordable Housing and Viability (2017)
  - Housing SPG (2016)
  - Shaping Neighbourhoods Accessible London: Achieving an Inclusive Environment SPG (2014)
  - Sustainable Design and Construction SPD (2014)
  - Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)

### Local Policy

#### 6.6 Havering Local Plan 2016-2031

- 6.6.1 The Havering Local Plan sets out the Borough's vision for development up to 2031.
- 6.6.2 Within the Local Plan, the Bridge Close site forms part of the Romford Strategic Development Area. Policy 1 states that the Council will support the delivery of over 6,000 new high quality homes in well managed residential and mixed use scheme that provide attractive places to live and which are well integrated with the existing community.
- 6.6.3 To inform the recently adopted Local Plan the Council prepared an Addendum to the 2015 Employment Land Review (2018). In summary, the 2015 Employment Land Review stated:
- “Bridge Close is a mixed town centre industrial estate with older buildings. It has several non-industrial uses within it including a gym and several places of worship. It is a fragmented industrial cluster with poor parking, poor quality environment and buildings that are no longer fit for purpose for modern business occupiers. It is earmarked in the emerging Romford Development Framework as a site that could be released from industrial employment uses and redeveloped for mainly high density residential (around 650 units). The most current proposals outlined in the Draft Romford Development Framework also include proposals for around 950 m2 of office uses.”*
- 6.6.4 Within the 2018 Addendum none of the new recommendations changed the original recommendation relating to the Bridge Close site. As such, the site continues to be identified for residential purposes, with Paragraph 9.1.6 of the Local Plan reiterating the conclusions of the Employment land Review as follows:
- “...The Employment Land Review advises that 24ha of employment land can be released over the Plan period. The previously designated land recommended for release comprises 2.7 ha at Crow Lane (Romford gas works), 15.4 ha at Rainham West and 1.4 ha at Bridge Close, Romford. The de-designation of these sites will facilitate the delivery of new residential developments and make a significant contribution towards meeting the borough's housing need.”*

#### 6.7 Romford Area Action Plan (2008) – Saved Site Allocation

## **Bridge Close, Romford**

6.8 The site is allocated for mixed-use development within the saved site allocations of the Romford Area Action Plan (ROMSSA2). The allocation seeks residential development with some commercial uses (A3), now Class E. A number of design parameters are suggested:

- Residential development is within the 240-435 units per hectare density range;
- A3 uses are at ground level and located along the River Rom frontage;
- The development incorporates new public spaces;
- The amenity, recreational and ecological value of the River Rom is enhanced, including the development of a riverside pedestrian route;
- The development is sensitive to the privacy and amenity of the existing housing along Waterloo Road and Oldchurch Road;
- Assistance is provided to existing businesses to find alternative locations; and
- The nearby Borough Site of Importance for Nature Conservation is protected and enhanced.

### **6.9 Romford Town Centre Development Framework (2015)**

6.9.1 In addition, the Romford Town Centre Development Framework ("RDF") (2015) is a material planning consideration in the preparation of the emerging development proposals for the site. The RDF also identifies the site, including the properties on Waterloo Road and Oldchurch Road, as suitable for comprehensive redevelopment to provide approximately 840 residential units, some ancillary community uses, 2,700 sqm of commercial space and new public open space. The residential-led mixed use scheme proposed accords with the range of uses suggested in the RDF, including the provision of a significant number of new homes, flexible employment and other commercial floorspace and new community floorspace, including the provision of a new primary school. Whilst the proposed scheme exceeds the suggested, approximate quantum of development set out in the RDF, it is considered appropriate given the need to optimise the development potential of this sustainable, brownfield site and has been agreed with officers during pre-application discussions. Importantly the proposed density range is within the requirements set by the Romford Area Action Plan. The densification also aligns with the sites location within Romford Opportunity Area.

6.9.2 Moreover, the Havering Local Plan identifies that over 6,000 new homes will be delivered within the Romford Strategic Development Area (wherein the application site is situated) over the Plan Period, at least 5,000 of which will be built over the first ten years. The development of this site for a residential-led mixed use scheme will contribute significantly to this target.

### **6.10 Romford Town Centre Masterplan**

6.10.1 Reflecting the significant opportunities that Romford offers and the importance of successfully integrating new schemes with existing developments and communities, the Council adopted the Romford Town Centre Masterplan Supplementary Planning Document (SPD) in March 2025

6.11 The applicant has worked with the Council Masterplan Team to make sure that the proposed development at the site is co-ordinated with the overall approach for the Town Centre to ensure a joined-up approach.

6.11.1 The proposed development accords with this direction of travel and the strategic allocations. It forms a significant site within the town centre and the proposed scheme will act as a catalyst for further investment and work in the local area. It will also ensure the beneficial reuse of a prominent and sustainably located brownfield site and provide a high quality residential-led development that will deliver a significant number of social, economic

and environmental benefits, including the delivery of new homes, open space, accessibility links and community facilities.

### 7.0 Planning Programme

- 7.1 The principle of the proposed redevelopment of the site is acceptable and in accordance with planning policy. The hybrid planning application for the comprehensive re-development of the site was submitted at the end of 2023, and following comments from statutory consultees and subsequent design revisions required to address the outstanding issues, a formal resubmission pack was submitted in May 2025. On 28 August 2025, London Borough of Havering's Strategic Planning Committee (SPC) resolved to grant planning permission for the re-development scheme. BCR LLP are currently in the process of drafting the Section 106 legal agreement with the Council ahead of referral back to the Mayor of London for final direction. Planning permission is expected to be granted in December 2025. Following the grant of planning permission, which is expected in December 2025, it is anticipated that separate but concurrent Section 96a and Section 73 applications will be submitted to vary the planning permission in order to retain the London Ambulance Service ("LAS"), in situ. These applications are expected to be granted in September 2026. Post submission a number of matters were raised in relation to 'in-principle' items with regard to the re-provision of social infrastructure. Appropriate solutions were reached with regard to re-providing existing social infrastructure in respect of Planning Policy and the conclusions of the SPC report are summarised below.

### 8.0 Material Planning Considerations

- 8.1.1 In relation to compliance to the three strands of sustainability, the proposals will deliver a range of social, economic, and environmental benefits as follows:
- i. **Social:** The development will support a strong, vibrant and healthy community by providing a range of new homes suitable for first-time buyers, families and people looking for affordable and shared ownership homes. The development will deliver a significant number of new homes, contributing towards the boroughs housing target and responding to local need, and will ensure that an increased range of homes are provided to meet the needs of present and future generations. All are designed as Part M4(2) accessible, with 10% designed to M4(3), and are able to be adapted for people with different abilities. The new homes will be provided with spacious internal areas meeting the internal floor area standards set out in the Nationally Described Space Standards and all with private amenity space in the form of balconies and terraces. The units will also benefit from access to further high quality communal amenity space and playspace across the site. The development will also provide a range of new community facilities, including a new primary school and community centre and health centre which will be well located and accessible for use by both existing and future residents. The new community centre will also be made available to the existing social infrastructure groups on site if required by the group. The development is well-designed with high quality landscaped areas and open space and will provide a safe built environment, with excellent pedestrian accessibility to the wider area, including a new east-west link through the site and signalised pedestrian crossing on Waterloo Road, providing better connections to the town centre, station and local services.
  - ii. **Economic:** The proposed development will contribute to helping build a strong, responsive and competitive economy, by bringing forward housing and commercial floorspace on an allocated housing site. The development will support growth of the local economy during the construction period and also provide long-term additional spend in the local economy as new residents move into the area and use local shops,

and spend money on local services. A number of direct and indirect jobs will also be supported during the construction period. A range of new commercial facilities will be provided as part of the scheme which will strengthen and diversify the retail and commercial offer within the town centre. Principally, the development will also provide a range of new flexible employment floorspace which will deliver a significant number of new jobs and enhance the economy and employment offer for Romford. In addition, 20% of the workspace across the development will be affordable. The employment floorspace on the site has been designed to comprise flexible, modern workspace to ensure it is attractive to a range of occupiers over the lifetime of the development, including potential local SME's and providing opportunity for existing businesses to be retained within the Borough. The proposed commercial floorspace will also help to activate the ground floor of the development and support the other retail and leisure uses proposed. The flexible commercial floorspace at ground floor will also generate further employment opportunities, dependent on the final mix of uses and occupiers which will provide local employment opportunities and will benefit the local economy via business rates, direct and indirect spend and the new commercial floorspace could contribute towards business rates annually.

- iii. **Environmental:** The proposed scheme will contribute to protecting and enhancing the natural environment, seeking to optimise the development potential of this previously developed site in a highly sustainable location within the town centre. The removal of the existing poor quality buildings and redevelopment to provide a high quality residential-led mixed use scheme will improve its overall visual appearance. The proposals seek to introduce a mixture of landscaping and planted elements which will be used to form high quality public realm and amenity space and will provide a high quality landscaped focus for the development. The development will provide a net benefit in biodiversity through a significant amount of landscaping and planting of a range of species planted to encourage biodiversity. The proposals also comprise restorative works to the River Rom, including naturalising the flow of the river and providing additional planting and landscaping along the banks. A new public route will be created along the river for use by pedestrians and cyclists and will include informal play and communal amenity space. The development has been designed to be predominantly car free, with a number of new footpath links through the site toward Romford Station and the town centre. The proposals comprise the redevelopment of previously developed land that is free from any environmental, archaeological, landscape or ecological constraints. The effects in relation to servicing, drainage, flood risk, arboriculture, air quality, archaeology, ecology, energy, sustainability, overheating, utilities and services, archaeology, contamination, crime prevention have all been assessed and mitigated as required.

8.2 It is considered that the proposed development meets the three requirements which define sustainable development in line with the NPPF.

### 8.3 Housing Provision

8.3.1 The need to provide new housing across London is recognised at the national, regional and local level as a key planning objective. Providing new homes in Havering is a key priority for the Council.

8.3.2 The Havering Local Plan specifically identifies the Order Land as a location where a significant number of new homes can be delivered to help meet the Boroughs housing need.

8.3.3 The proposed development will make a significant contribution to the Council's annual housing target and assist in addressing the existing shortfall of housing in the Borough and

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meeting London Plan targets. The provision of up to 1,070 residential dwellings on the site would contribute to 85% of the Council's annual housing target in the adopted Local Plan and 83% towards the Council's annual housing target in the London Plan.

### 8.4 Proposed Commercial Uses

- 8.4.1 The masterplan includes the provision of up to 5,956 sqm (GEA) of flexible commercial floorspace across the whole site. This will include a mix of retail uses, new employment floorspace comprising office and makerspace and leisure uses (Class E). The space will enhance the boroughs employment, retail and social infrastructure offer, and will activate the ground floor and public realm across the Scheme, to provide a dynamic location linked to Romford town centre.
- 8.4.2 The mix of commercial uses identified are considered to be appropriate given the location of the site within the town centre and have been designed to complement the existing local offer and encourage economic growth in Romford. The provision of flexible commercial floorspace is considered acceptable in principle, given that the site is allocated for mixed-use development in the Romford Area Action Plan (2008).
- 8.4.3 The Scheme is a truly mixed-use development which will deliver a number of planning and regeneration benefits, including the provision of a significant amount of high quality, flexible and affordable employment floorspace that will be suitable for a range of occupiers. The amount of floorspace proposed is considered to be appropriate, having regard to London Plan Policies E1, E3 and E7 and the relevant Local Plan policies, including the sites allocation within the Romford AAP (2008), and taking account of the need to provide other uses including a significant number of new homes and new community uses.

### 8.5 Reprovision of Social Infrastructure

- 8.6 The proposed development involves the demolition and redevelopment of all of the existing buildings on the site, including those occupied by the faith and community groups. However, the outline element (Phase 2 & 3) of the planning application provides for up to 2,768 sqm of flexible new community floorspace, Class F1 (Learning and Non-Residential Institutions) and Class F2 (Local Community) which would be available to use by the existing community group should they wish to remain on site.
- 8.6.1 The majority of the Order Land, including the buildings occupied by HICC and other faith groups, are allocated for comprehensive redevelopment within the Romford Area Action Plan (site ref. ROMSSA2). In addition, the Town Centre Development Framework document (2015) identifies the HICC premises as part of a wider redevelopment opportunity, and makes clear that a comprehensive approach to redevelopment is required.
- 8.6.2 The Council considers it appropriate for the whole site to be coming forward comprehensively through a holistic masterplan approach that includes the redevelopment of the buildings occupied by the HICC and other faith groups.
- 8.7 The development plan requires re-provision of social infrastructure facilities in circumstances where there is a defined need and the Council has carefully considered how to address this requirement. The Council is providing assistance and compensation, where appropriate, for faith groups to relocate.
- 8.8 The Applicant has identified an alternative site in Romford for HICC (which HICC has agreed meets its needs) and has agreed to acquire this site, either by agreement, or if that proves to be impossible, as part of the CPO process. It is acknowledged that the SPC report sets out the hybrid application includes 2,768 sqm of flexible space, with 1,001 sqm

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specifically allocated for a community centre within Block D1, which could accommodate the HICC onsite if necessary, in order to accord with Policy 16 of the Local Plan. However, the SPC report also identifies that HICC has expressed concerns that the proposed facilities may not adequately meet their current and future needs. It is understood from the HICC that this remains the case and that the HICC require an off-site solution.

- 8.9 In January 2023, HICC met with the LPA to discuss proposals to develop 222-226 South Street for its use. Following the meeting the LPA confirmed that HICC's use was acceptable in principle, subject to scale and providing suitable infrastructure. Taking account of the LPA's feedback, HICC has submitted a pre-application advice request for a detailed development proposal. It is understood that pre-application discussions are ongoing and that the HICC intends to submit a formal planning application once the outstanding issues have been resolved.

### 8.10 Housing Mix

- 8.10.1 A flexible housing mix is required in order to take account of the location of the site within an area of change, market demand and housing needs over time. The details of the housing mix for the outline element of the scheme are to be agreed at Reserved Matters stage. However, a development specification was submitted with the hybrid application that sets out the parameters for the housing mix of the outline element comprising: 42% 1-bed units, 47% 2-bed units and 12% 3-bed units. The final details of the housing mix will be determined through reserved matters approvals.
- 8.10.2 The housing mix for the detailed element of the scheme (Phase 1) has been fixed. The first phase will comprise two Plots, Plot A (229 dwellings) and Plot B (154 dwellings), providing a total of 383 dwellings. The mix of housing types proposed is as follows:

Unit Type	Affordable Rent	Shared Ownership	Private	Total	Unit Percent
1B2P	11	27	98	136	35%
2B3P	15	33	45	93	24%
2B4P	7	16	95	118	31%
3B4P	1	1	0	2	0.5%
3B5P	5	10	16	31	8.8%
3B6P	0	0	1	1	0.2%
4B6P	0	0	1	1	0.2%
4B7P	0	0	1	1	0.2%
Total	39	87	257	383	100%

- 8.10.3 The proposed mix provides a range of unit types and sizes across each tenure and is considered appropriate for the site. The variety of units will assist in creating a mixed and balanced community, meeting identified local needs and according with Policy 5 of the Local Plan which recognises the need to have regard to site specific circumstances and constraints of the site.

### 8.11 Affordable Housing

- 8.11.1 The policy requirement to provide affordable housing on site is clear. Subject to viability considerations, it is proposed that the Scheme provides a policy compliant 35% affordable dwellings across the development; comprising 70% shared ownership and 30% social rent tenures. In designing this scheme, the following objectives have been targeted:

- On-site delivery of affordable homes;
- Maximise the provision of affordable homes through the provision of shared ownership accommodation; and

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- The delivery of 35% affordable dwellings (calculated on the basis of habitable rooms) across the whole development.
- 8.11.2 Phase 1 of the Scheme will provide 126 affordable residential units (33% when calculated by unit numbers and 35% on a habitable room basis), with a split comprising 69% intermediate and 31% affordable rent tenures.
- 8.11.3 Within Plot B, 126 of the units will be delivered as affordable; 39 of the units are affordable rent and 87 of the units are intermediate. The remaining units in Plot B (28 units) are private for sale.
- 8.11.4 Plot A will comprise entirely private for sale housing (229 residential dwellings).
- 8.11.5 Overall, the Scheme will provide a mix of units types and tenures that respond to local needs and will assist in providing a mixed and balanced community on the site. The proposed affordable housing offer has been subject to rigorous viability testing and comprises more than the maximum reasonable amount of affordable housing that the scheme can deliver, in accordance with relevant planning policy at all levels.

### The Varied Scheme

- 8.12 The Varied Scheme will result in a reduction in the overall number of units by 174 dwellings in comparison with the 'up to figure' of 1,070 dwellings in the original scheme. A total of up to 896 dwellings will be proposed in the Varied Scheme with 35% of the total number of habitable rooms being provided as affordable housing. The key matters for consideration in respect of the Varied Scheme and the retention of the LAS on site include:
- Meanwhile and long term car parking for the LAS and how this is secured. A separate planning application will be submitted to enlarge the existing LAS car park to ensure there is no loss of car parking capacity;
  - Amendments to the access strategy and the submitted Access and Movement Parameter Plan which shows a pedestrian and cycle route along the River Rom on the eastern boundary of the LAS site. An alternative route would need to be diverted to the west of the LAS site. The vehicular access strategy will also be amended to enable access to the LAS site to be retained;
  - Relationship between the LAS building and the remainder of the Phase 2 parcel and also the school site in Phase 1; and
  - Amendments required to public open space and green infrastructure in the masterplan.

## 9.0 Development Plan Compliance

- 9.1 The Scheme and the Varied Scheme comply with the development plan as a whole. The key development plan policies are summarised below.
- 9.2 **London Plan (2021):** Policy SD1 (Opportunity Areas); Policy SD6 (Town centres and high streets); Policy SD7 (Town centres: development principles and Development Plan); Policy SD10 (Strategic and local regeneration); Policy D1 (London's form, character, and capacity for growth); Policy D2 (Infrastructure requirements for sustainable densities); Policy D3 (Optimising site capacity through the design-led approach); Policy D4 (Delivering good design); Policy D5 (Inclusive design); Policy D6 (Housing quality and standards); Policy D7 (Accessible housing); Policy D8 (Public realm); Policy D9 (Tall buildings); Policy D11 (Safety, security and resilience to emergency); Policy D12 (Fire safety); Policy D13 (Agent



of Change); Policy D14 (Noise); Policy H1 (Increasing housing supply); Policy H4 (Delivering affordable housing); Policy H5 (Threshold approach to applications); Policy H15 (Purpose-built student accommodation); Policy S4 (Play and recreation facilities); Policy E2 (Providing suitable business space); Policy E3 (Affordable workspace); Policy E4 (Land for industry, logistics and services to support London's economic function); Policy E9 (Retail, markets and hot food takeaways); Policy E11 (Skills and opportunities for all); Policy HC1 (Heritage conservation and growth); Policy HC5 (Supporting London's culture and creative industries); Policy HC6 (Supporting the night-time economy); Policy G1 (Green infrastructure); Policy G4 (Local green and open space); Policy G5 (Urban greening); Policy G6 (Biodiversity and access to nature); Policy G7 (Trees and woodlands); Policy SI1 (Improving air quality); Policy SI2 (Minimising greenhouse gas emissions); Policy SI3 (Energy infrastructure); Policy SI4 (Managing heat risk); Policy SI5 (Water infrastructure); Policy SI6 (Digital connectivity infrastructure); Policy SI7 (Reducing waste and supporting the circular economy); Policy SI8 (Waste capacity and net waste self-sufficiency); Policy SI12 (Flood risk management); Policy SI13 (Sustainable drainage); Policy SI16 (Waterways – use and enjoyment); Policy T1 (Strategic approach to transport); Policy T2 (Healthy Streets); Policy T3 (Transport capacity, connectivity and safeguarding); Policy T4 (Assessing and mitigating transport impacts); Policy T5 (Cycling); Policy T6 (Car parking); Policy T6.1 (Residential parking); Policy T6.2 (Office parking); Policy T6.3 (Retail parking); Policy T6.5 (Non-residential disabled persons parking); Policy T7 (Deliveries, servicing and construction); Policy T9 (Funding transport infrastructure through planning); Policy DF1 (Delivery of the Plan and Planning Obligations); Policy M1 (Monitoring).

- 9.3 **Havering Local Plan (2021):** Policy 1 (Romford Strategic Development Area); Policy 3 (Housing supply); Policy 4 (Affordable Housing); Policy 5 (Housing mix); Policy 7 (Residential design and amenity); Policy 12 (Healthy communities); Policy 14 (Eating and drinking); Policy 16 (Social Infrastructure); Policy 17 (Education); Policy 18 (Open space, sports and recreation); Policy 19 (Business Growth (protection of designated Locally Significant industrial Sites)); Policy 23 (Transport connections); Policy 24 (Parking provision and design); Policy 26 (Urban design); Policy 27 (Landscaping); Policy 29 (Green infrastructure); Policy 30 (Nature conservation); Policy 33 (Air quality); Policy 34 (Managing pollution); Policy 35 (On-site waste management); Policy 36 (Low carbon design, decentralised energy and renewable energy).

- 9.4 **Romford Area Action Plan 2008:** ROMSSA2 – Bridge Close.

### 10.0 Delivery Structure and Funding

- 10.1 This section sets out how the Scheme will be delivered and funded.
- 10.2 The Council established a joint venture development vehicle, Bridge Close Regeneration LLP ("BCR LLP") to bring forward the proposed regeneration of the Scheme (see the Order Land).
- 10.3 BCR LLP was until October 2020 jointly owned between the Council and the SPV. On 16<sup>th</sup> September 2020, Cabinet approved the proposed acquisition by the Council of the private sector interest in BCR LLP and on 29<sup>th</sup> October 2020, the Council entered into a purchase agreement to acquire the interest in BCR LLP that it did not already own from the SPV.
- 10.4 In light of the Council acquiring full control of BCR LLP, on 16<sup>th</sup> December 2020, Cabinet considered a number of recommendations relating to the future funding and delivery of the scheme. Approval was granted for the Council to deliver the regeneration of Bridge Close directly, funding the development entirely through Council resources, predominantly using the Housing Revenue Account. Cabinet approved a budget with referral to and subsequent agreement by Full Council on 3<sup>rd</sup> March 2021. Subsequently, the Bridge Close

## Bridge Close, Romford

Regeneration LLP Business Plan 2022/2023 was approved by Cabinet on 16<sup>th</sup> February 2022 and thereafter adopted by the Bridge Close Regeneration LLP.

- 10.5 In accordance with the Members' Agreement, BCR LLP were required to issue and agree a draft Business Plan to the Council as Member. The updated Business Plan was approved in February 2023. It included a review of key work streams underpinning the delivery of the Council's vision for Bridge Close and provides an update of the budget and financial model approved by Cabinet in December 2020 and recommends that the updated Business Plan be agreed, noting the significant benefits to the regeneration of Romford town centre, the contribution towards Havering's target for housing delivery, and the expected financial returns anticipated in the plan.
- 10.6 The Business Plan forms part of a comprehensive suite of project documents, including the Members' Agreement, the Land Agreement, the Land Acquisition Strategy, the Security Agreement and the Loan Note Instruments which, amongst others, set out the strategy and the terms and conditions for provision of funding by the Council as principal Member of the JV (noting that a wholly owned company of the Council acts as second member of the JV). The Business Plan is a suite of strategy and policy documents, including a budget and financial model with detailed forecasts, which provides a management framework for delivering the vision and objectives for the regeneration of Bridge Close. The Business Plan and associated budget for delivery of the Scheme is reviewed and updated on an annual basis. The latest Business Plan for the year 2025-2026 was approved by Cabinet and Full Council on 5<sup>th</sup> February 2025 and 26<sup>th</sup> February 2025, respectively.
- 10.7 As highlighted above, the proposed regeneration is an important policy priority for the Council. The Council has worked to ensure necessary funding, approvals and consents and all other matters required for delivery of the regeneration proposals are in place. As of 31st March 2025, in excess of £50 million has been invested in the scheme, including £36 million of site assembly costs. This investment has been funded by the Council entirely. Investment in site assembly and design development continues in accordance with the Business Plan.
- 10.8 Since establishment of BCR LLP, the development of proposals has been progressed by a multi-disciplinary team of professional advisors and technical consultants, working collaboratively across multiple, interrelated workstreams, including the masterplan, individual plot designs comprising residential and social infrastructure, as well as design and place-making of the wider public realm. A planning application was submitted on 29<sup>th</sup> November 2023, reflecting design development to RIBA Stage 2. Key members of the design and delivery team are set out as follows<sup>6</sup>:
- Project Management, Procurement, Employer's Agent, Clerk of Works (Atkins Realis)
  - Masterplanning (Fletcher Priest Architects)
  - Architectural Design (Allies & Morrison, MacCreanor Lavington Architects)
  - Civil, structural, MEP engineering (Meinhardt)
  - Technical Specialisms (Stantec, Gordon Ingram Associates, other specialists)
  - Land Assembly & CPO (Ardent)
  - Town Planning (Savills)
  - Cost Planning (Gardiner & Theobald)
  - Sales Advisory (Savills)
  - Legal (Browne Jacobson LLP, Howard Kennedy LLP)

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- 10.9 A procurement strategy has been adopted for the procurement of a demolition and a main contractor based on a full open market tender using a two-stage procurement with novation of the design team to the contractor. The contracts will be awarded based on the most commercially advantageous terms and conditions.
- 10.10 As such, the Council, through BCR LLP, has assembled a comprehensive team with the requisite skills to manage the scheme and its related risks through design development to procurement of a main contractor and construction delivery. The Council has a fully capable resource to ensure delivery of the scheme.
- 10.11 The Scheme will be developed in a total of three phases in keeping with the timetable envisaged by the Business Plan. The current indicative programme for delivery of the three phases, with start on site expected in Quarter 2 of 2027, completion of Phase 1 is anticipated in the autumn of 2030 with phased delivery of the Scheme to completion early in 2035 in accordance with circumstances prevailing at the time.
- 10.12 The Council will continue to seek to acquire any outstanding interests in the Order Land through private treaty negotiations in accordance with the phasing strategy for the delivery of the Scheme and similarly will implement the Order (where required) if confirmed to allow the phasing and decant proposals to be achieved.
- 10.13 In order to provide certainty on the ability to deliver the Scheme and/or the Varied Scheme (which will include the delivery of new housing funded by the GLA and the flexibility to enable the reprovision of homes for all qualifying residents) the Council has included all land and rights required to deliver the Scheme within the Order now, including the land necessary for the relocation of the HICC and land required for the later sub phases the last of which is not expected to commence until Quarter 2 of 2031.
- 10.14 In relation to 222-226 South Street, HICC is advised by an experienced development team that includes NTR and John McAslan & Partners. Funding for the new facility will be provided by a combination of compulsory purchase compensation from the Council, HICC's own funds raised from its congregation and third-party funding (potentially including Sharia finance and other charitable donations). The in-principle agreement reached between HICC and the Council (which is in the process of being formally documented) requires HICC to submit a detailed funding plan.
- 10.15 **The Council's track history of success in regeneration**
- 10.16 Havering has an exciting regeneration agenda, to create even more places in the borough where people are proud to live and communities thrive.
- 10.17 Through its regeneration programmes, the Council is:
- Building modern, energy-efficient homes and well-connected neighbourhoods that are right for the borough;
  - Providing new, high quality Council housing and increasing the amount of family-sized homes;
  - Providing infrastructure to support new homes;
  - Increasing opportunities for home ownership for Havering residents;
  - Supporting healthy communities, fit for future generations;
  - Supporting and investing in the local economy to create a thriving place; and
  - Protecting and celebrating history and heritage.

## **Bridge Close, Romford**

10.18 Two particular developments that are similar in nature to the Scheme and demonstrate the Council's track history of success in regeneration are Park Rise and the 12 Sites Regeneration Programme.

### **10.19 Park Rise - Solar Serena Sunrise, Sunrise Avenue, Hornchurch**

10.19.1 The Park Rise scheme (formerly Solar Serena Sunrise) will create a high-quality older persons retirement village in the heart of Hornchurch, next to Harrow Lodge Park.

10.19.2 175 new properties will be provided for the over 55's, including new council rented homes, shared ownership homes and properties for sale.

10.19.3 The project is currently in its construction phase, with new homes to be available for local residents later in 2023.

### **10.20 12 Sites Regeneration Programme**

10.20.1 The Council is working in partnership with Wates Residential in a joint venture to deliver over 3,500 much-needed new homes across 12 existing housing sites within the borough.

10.20.2 The programme focuses on delivering investment, new homes and 'designing out crime' on housing sites that need it most.

10.20.3 The Council's ambition is to leave a lasting legacy for local communities, supporting the vision that everyone deserves a great place to live.

10.20.4 The Council's 12 Sites programme will double the amount of affordable homes on these sites overall, council rented homes will increase by 70 per cent and just under 400 new shared ownership homes will be delivered, as well as new homes to buy.

10.20.5 Every Council tenant that moved from their home to enable the regeneration works is guaranteed the right to return to a brand new property.

## **11.0 The Use of the Enabling Powers**

11.1 Sections 226(1)(a) and (3)(a) of the Town and Country Planning Act 1990 confer power on a local authority to acquire land compulsorily for development and other planning purposes within its area if it thinks that the acquisition will facilitate the carrying out of development, re-development or improvement on or in relation to that land.

11.2 The power to acquire land compulsorily conferred by Section 226(1)(a) of the 1990 Act is subject to subsection (1A), which provides that the acquiring authority must not exercise the power unless it believes that the development, re-development or improvement is likely to contribute to the achievement of any one or more of the following objectives:

- Promotion or improvement of the economic wellbeing of their area.
- Promotion or improvement of the social wellbeing of their area.
- Promotion or improvement of the environmental wellbeing of their area.

11.3 The Council considers the Scheme meets the tests within subsection (1A). Section [12.0] of this Statement describes the wellbeing benefits arising from implementation of the Scheme.

11.4 Mindful that it should not use a more general compulsory purchase power when a more specific one is available, the Council considers that the section 226(1)(a) power is the most

appropriate one because the Order seeks to acquire Lands for mixed use purposes and that form part of a wider Scheme.

### 11.5 **Section 13 Local Government (Miscellaneous Provisions) Act 1976**

11.6 Section 13 of the Local Government (Miscellaneous Provisions) Act 1976, enables local authorities to create and purchase compulsorily new rights over land, where the acquisition of the land itself is not required and where such rights are not in existence when the compulsory purchase order is made.

11.7 In order to ensure delivery of the Order Land development, the Council is seeking to exercise these powers with new rights sought for: (i) crane oversailing, (ii) rights of access (iii) works to the highway and landscaping and (iv) for the purpose of erecting scaffolding and hoarding during the construction period.

11.8 The rights being sought are only required for a finite period during the construction phase. It is unlikely that the Council will be able to negotiate the acquisition of these rights with relevant third parties within the required timescale and they are necessary to deliver the development.

### 11.9 **Compliance with Ministry for Housing, Communities and Local Government Guidance (2019) Compulsory Purchase and the Crichel Down Rules**

11.10 The "CPO Guidance" assists acquiring authorities in England on the proper use of compulsory purchase powers.

11.11 Paragraph 1 of Tier 1 of the CPO Guidance states that:

*"Compulsory purchase powers are an important tool to use as a means of assembling the land needed to help deliver social, environmental and economic change. Used properly, they can contribute towards effective and efficient urban and rural regeneration, essential infrastructure, the revitalisation of communities, and the promotion of business – leading to improvements in quality of life."*

11.12 On confirmation of the Order, the Council intends to execute one or more General Vesting Declarations or serve a Notice (or Notices) to Treat, in order to secure unencumbered title of the Order Land facilitating regeneration of the area and bring about a step change in the community.

11.13 The CPO Guidance (Paragraph 2 of Tier 1) goes on to state that:

*"Acquiring Authorities should use compulsory purchase powers where it is expedient to do so. However, a compulsory purchase order should only be made where there is a compelling case in the public interest."*

11.14 The Council considers that there is a compelling case in the public interest for the exercise of its compulsory purchase powers to compulsorily acquire the Order Land (including 222-226 South Street) to implement the Scheme and the Council has demonstrated this throughout this statement

11.15 Paragraph 2 of the CPO Guidance continues to advise that an acquiring authority should ensure that the purposes for which it is making a compulsory purchase order sufficiently justify interfering with the human rights of those with an interest in the land affected. Human Rights considerations are set out in Section [14.0] of this Statement.

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- 11.16 Paragraph 6 of Tier 1 provides guidance that the Public Sector Equality Duty in section 149 of the Equality Act 2010 must be fulfilled. The Council (and the Secretary of State) must discharge the Public Sector Equality Duty when making (and confirming) a compulsory purchase order. Section [14.0] of this Statement on Human Rights and Equality provides further information on how the Council has done so throughout the process.
- 11.17 The CPO Guidance provides certain general policy requirements, which apply to all CPOs. From this general guidance the Council is required to have regard to the following when considering the making of a compulsory purchase order:
- How the land will be used and that the purposes for which the order is made sufficiently justify interfering with the human rights of those with an interest in the land affected.
  - Whether the necessary resources are likely to be available to deliver the scheme within a reasonable timescale.
  - The degree to which other bodies (including the private sector) have agreed to make financial contributions or to underwrite the scheme including the basis and timescales for such contributions or underwriting to be made; and
  - Whether the scheme is likely to be blocked by other impediments to implementation.
- 11.18 The above points are addressed at sections [12.0-15.0] of this Statement, respectively
- 11.19 Particular guidance on Orders made by acquiring authorities under section 226 of the 1990 Act is provided in Section 1 of Tier 2 of the CPO Guidance. In particular, Paragraph 98 states that the powers in Section 226 can be used by local authorities as they are; *".... intended to provide a positive tool to help acquiring authorities with planning powers to assemble land where this is necessary to implement proposals in their Local Plan or where strong planning justifications for the use of the power exist. It is expressed in wide terms and can therefore be used to assemble land for regeneration and other schemes where the range of activities or purposes proposed mean that no other single specific compulsory purchase power would be appropriate."*
- 11.20 Paragraph 100 (Tier 2, section 1) refers to section 226(1)(a) of the 1990 Act enabling acquiring authorities with planning powers to acquire land if they think that it will facilitate the carrying out of development, redevelopment or improvement on, or in relation to, the land being acquired, and it is not certain that they will be able to acquire it by agreement.
- 11.21 Paragraph 105 of the same section makes clear that the benefit to be derived from exercising the power is not restricted to the area subject to the compulsory purchase power, as the concept of wellbeing is applied to the whole (or any part) of the acquiring authority's area. Section [12.0] of this Statement includes information regarding the wellbeing benefits which will arise from the Scheme.
- 11.22 Paragraph 107 (Tier 2, section 1) sets out further information on the justification required to support an Order to acquire land compulsorily under section 226(1)(a) of the 1990 Act. This includes:
- Programme of land assembly to be set within a clear strategic framework [see Sections [2.0], [3.0] and [6.0] of this Statement]
  - Such a framework needs to be founded on an appropriate evidence base and to have been subjected to consultation processes (see [Section 4.0]).
  - The planning framework should be as detailed as possible in order to demonstrate that there are no planning or other impediments to the implementation of the scheme ([Sections 12.0-15.0]).
  - Consideration of the NPPF as this is a material consideration in all planning decisions (Section [6.2]).

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- 11.23 Paragraph 108 (Tier 2, section 1) makes it clear that it is not always feasible or sensible to wait until the full details of the scheme have been worked up before proceeding with the order. In such cases the responsibility lies with the acquiring authority to put forward a compelling case for acquisition in advance of resolving all uncertainties. Section [5.0] sets out details of the planning application and explains the parameters for delivery of residential and non-residential floorspace within the Scheme. The Council considers that there is a compelling case to make the Order now, in order to secure delivery of the Scheme and/or the Varied Scheme and the associated wellbeing benefits set out in Section [12.0], in advance of the reserved matters being granted.
- 11.24 A compulsory purchase order to which there are objections will require confirmation by the Secretary of State to become effective. Paragraph 109, Tier 2 of the Guidance provides that any decision by the Secretary of State about whether to confirm an Order made under Section 226(1)(a) will be made on its own merit but the factors which the Secretary of State can be expected to consider include:
- i. Whether the purpose for which the land is being acquired fits in with the adopted Local Plan for the area or, where no such up to date Local Plan exists, with the draft Local Plan and the NPPF.
  - ii. The extent to which the proposed purpose will contribute to the achievement of the promotion or improvement of the economic, social or environmental wellbeing of the area.
  - iii. Whether the purpose for which the acquiring authority is proposing to acquire the land could be achieved by any other means. This may include considering the appropriateness of any alternative proposals put forward by the owners of the land, or any other persons, for its reuse. It may also involve examining the suitability of any alternative locations for the purpose for which the land is being acquired.
- 11.25 The above points are addressed at sections [6.0, 12.0 and 15.0] respectively
- 11.26 Tier 2, section 21 of the Guidance is also relevant as it relates to the compulsory purchase of new rights including under the 1976 Act. Paragraph 266 sets out that there should be a description of relevant powers and purposes (which purposes may, as here, be the same purposes as those for the land to be acquired). These matters are addressed in Section [4.0] of this Statement.
- 11.27 The Council has followed the Guidance in making the Order. The Council is exercising the powers under section 226(1)(a) of the 1990 Act because the Scheme will facilitate the redevelopment of the area and will make a significant contribution to the improvement of the economic, social and environmental wellbeing of the Council's area, including residents of the Order Land. The exercise of the powers conferred by section 13 of the 1976 Act is also required to facilitate development of the Scheme and/or the Varied Scheme (as set out in Section [11.5] above). Further explanation as to the justification for the use of compulsory purchase powers is set out in the subsequent sections of this Statement.

### **12.0 The Purpose and Justification for the Use of Compulsory Purchase Powers**

- 12.1 Through its policies, the Council has consistently recognised and promoted the need to regenerate Bridge Close, as summarised in [Section 2.0] of this Statement.
- 12.2 The section below sets out the purpose and justification of the use of compulsory purchase powers to facilitate the carrying out of development applying the tests set out in the CPO Guidance.
- 12.3 It explains how the regeneration of Bridge Close will improve the environmental, social and economic wellbeing of the Order Land and the surrounding area.

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- 12.4 The Council's case is that the use of compulsory purchase powers is necessary to acquire the Order Land (including the new rights) to facilitate the delivery of the Scheme and the Varied Scheme and that delivery of the development compellingly in the public interest.
- 12.5 The Council considers that the Order is fully justified. The resolution to make the Order accords entirely with the provisions in the CPO Guidance which encourages local authorities to exercise their compulsory purchase powers in such a way as to ensure that sites are brought forward for development.
- 12.6 Circular paragraph 109.1 (bullet point 1) of the CPO Guidance considers whether the purpose for which the land is being acquired fits with the adopted Local Plan for the area or where no such up to date plan Local Plan exists, with the draft Local Plan and NPPF. In this case, there is an adopted Local Plan and existing Site Allocation that signals the intention for comprehensive redevelopment of the site.
- 12.7 As set out in detail in [Section 6.0] above, the Scheme and Varied Scheme are in accordance with national, regional and local planning policies.
- 12.8 The need to regenerate this area has been consistently recognised by the Council for well over a decade, dating as far back as designation of the Order Land for residential development in the Local Development Framework 2008
- 12.9 London and the South East are experiencing significant development pressures and there is a need to increase the supply of housing to meet the demands of the growing population. The NPPF requires local planning authorities to identify and meet their full objectively assessed needs for housing.
- 12.10 Housing needs are recognised by the Government as being an unconstrained assessment of the number of homes required in an area to meet local needs. This assessment is required to be undertaken separately to a housing land availability assessment. As a result, the Government has published the Standard Method for assessing housing need, setting out the minimum number of homes expected to be planned for in each local authority area. The NPPF is clear that LPAs should follow this when preparing their emerging plans. The Standard Method figures identify that LBH has a housing requirement of 1,979 dwellings per annum (dpa), based on the latest population projections.
- 12.11 The London Borough of Havering forms part of the London-wide housing market area with all of the other London Boroughs. The Mayor of London, through the preparation of the 2021 London Plan sought to identify both the need for new housing and the potential supply across London. Table 4.1 of the London Plan (2021) identifies a need for a minimum of 522,870 new homes in London between 2019-2029 (or 52,287 new homes per annum). The London Plan sets out average annual minimum housing supply targets for each borough until 2029 The ten year housing target for London Borough of Havering within the London Plan (2021) is 12,850.
- 12.12 At a sub-regional level the London Borough of Havering forms part of the Outer North East London Housing Market Area with the London Boroughs of Barking and Dagenham and Redbridge. The Council has worked with these authorities to prepare a sub-regional SHMA. A subsequent update has been prepared for Havering taking into account updated GLA household projections. The 2023 SHMA Update for Havering indicates that Havering's full Objectively Assessed Need is for 31,081 new homes (of which 38% is for affordable housing) over the period, 2021-2043, or 1,554 homes per annum. Additionally, the Council's latest authority monitoring report (AMR) (2023-2024) states that LBH is unable to demonstrate 5 Year Housing Land Supply. The 2023-2024 AMR identifies that LBH is only able to demonstrate a housing land supply of 2.9 years (including 20% buffer).



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- 12.13 Delivery of the Scheme or the Varied Scheme on the Order Land will make a significant contribution towards the Council attaining these housing targets.
- 12.14 Circular paragraph 109.1 (bullet point 2) of the Guidance considers the extent to which the proposed purpose will contribute to the achievement of the promotion or improvement of the economic, social or environmental wellbeing of the area.
- 12.15 The Scheme and the Varied Scheme will make a significant contribution to the achievement of the promotion or improvement of the economic, social or environmental wellbeing of the area, as set out in the following:

### Economic

- 12.16 The Scheme and the Varied Scheme will make a significant contribution to tackling the economic issues facing the community in and around Bridge Close. This includes providing employment and training opportunities so that residents have access to more jobs locally, while also having the right skills to access jobs across London. The investment in Bridge Close in proximity to Romford centre will also deliver a significant boost to the local economy, benefiting existing and new businesses in the local area. As set out in the Employment and Skills Plan dated July 2023 and accompanying the associated planning application, Policy 22 of the Local Plan specifies the following employment and skills targets:
- i. A minimum local labour target of 20% during construction for major commercial or mixed use developments including a proportion of apprenticeships where the length of construction phase allows;
  - ii. A minimum local labour target of 20% during construction for major residential developments;
  - iii. The notification of all vacancies associated with the development and its end use through the Council's employment service; and
  - iv. Offer opportunities to local businesses within their supply chains
- 12.17 Consequently, the proposed Scheme and Varied Scheme targets include:
- i. 58 apprenticeships.
  - ii. 20% of the labour force comprised of local residents or businesses.
  - iii. 61 Havering residents securing work through the project.
  - iv. 306 jobs advertised through the Council's employment service.
  - v. 29 career events.
  - vi. 25 qualifications and certificates gained by residents of Havering.
- 12.18 The following positive wider economic impacts will arise due to the Scheme and the Varied Scheme:
- i. The creation of a new sustainable residential neighbourhood with supportive social and physical infrastructure will act as catalyst for economic growth, with the economic multiplier effect impacting positively on the local community.
  - ii. The delivery of the Housing Zone objectives will also direct investment and development activity in the area.
  - iii. Positive changes to the Ring Road will reduce its barrier effect and create a new east-west link with high quality well-connected public realm.
  - iv. Access by public transport, walking and cycling from the west of Romford to the town centre and the station will be improved, thus integrating Bridge Close into the fabric of the town.

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- v. The east-west link will provide a route between the growing residential areas to the west of the town through to a proposed southern entrance to Romford station.
- vi. The development will support growth of the local economy during the construction period and also provide long-term additional spend in the local economy as new residents move into the area and use local shops, and spend money on local services. A number of direct and indirect jobs will also be supported during the construction period.
- vii. A range of new commercial facilities will be provided as part of the scheme which will strengthen and diversify the retail and leisure offer within the town centre. Principally, the development will also provide a range of new flexible employment floor space which will deliver a significant number of new jobs and enhance the economy and employment offer for Romford (20% of which will be affordable in nature).

### Social

- 12.19 The economic benefits noted above and the environmental benefits listed below will improve the social wellbeing of the Council's area by creating jobs and creating a new attractive environment within which to live. In addition to those benefits, the opportunities presented by the regeneration would create social benefits for local people and businesses in Bridge Close and the wider community and make a significant contribution towards the promotion and improvement to social wellbeing in the Council's areas. The following positive social impacts will arise due to the regeneration scheme:
- 12.20 The removal of secondary, basic quality commercial buildings from Romford Town Centre and replacement with a high-quality mixed-use development will create balanced, mixed and inclusive communities. This will directly result in the improved quality of life for the community including both existing and future residents.
- 12.21 The provision of an improved tenure mix of private and affordable housing units resulting in a mixed, balanced, community with its own identity in a well-designed space for living, working and leisure, thereby promoting social cohesion and wellbeing.
- 12.22 An increase in the overall quantum of housing to meet housing need. All of which are designed as Part M4(2) accessible, with 10% designed to M4(3), and are able to be adapted for people with different abilities.
- 12.23 The completion of the development will contribute towards the delivery of much needed well designed housing (including affordable housing) to the Borough that includes links to significant new transport infrastructure, public open space, improved connections for pedestrians and cyclists.
- 12.24 The comprehensive re-development of the Order Land (including all of the industrial units at Bridge Close, the Islamic Cultural Centre and the houses fronting Waterloo and Oldchurch Roads) will deliver significant urban design benefits, such as greater open space, a more positive southern gateway to the area, and a revitalised frontage along Waterloo Road. The Varied Scheme would retain the London Ambulance Station (LAS) in situ and the redesign of Phase 2 would ensure the LAS is able to function effectively alongside the development. A separate planning application will be submitted to enlarge the existing LAS car park to ensure there is no loss of car parking capacity and the access strategy will be amended to enable access to the LAS site to be retained.
- 12.25 The development will also provide a range of new community facilities, including a new primary school and community centre which will be well located and accessible for use by

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both existing and future residents. The new community centre will also be made available to the existing social infrastructure groups on site if required. In addition, the intention is to provide an improved facility for HICC at 222-226 South Street. There will be a reduction in the amount of community facilities that can be delivered by the Varied Scheme but the removal of LAS from the Order Land removes a potential impediment to delivery.

- 12.26 The development will provide for a safer local community where, as a result of the application of Secured By Design principles, buildings and the public realm within Bridge Close will provide a safe environment for local residents and the wider community to live, work and play. It is expected that the Scheme will have a material beneficial impact on the reduction of crime and anti-social behaviour currently experienced on Bridge Close.

### Environmental

- 12.27 The Scheme and Varied Scheme have been designed to enhance the environmental wellbeing of the residents and other occupiers within the area and the Borough as a whole and tackle issues currently facing local residents. The following positive environmental impacts will arise due to the regeneration scheme:

- i. All residential units built to comply with Part L of the Building Regulations.
- ii. Improvements to pedestrian and cycle connections throughout the local area particularly with regard to accessing off-site leisure and recreation facilities.
- iii. An increase in the quantity and quality of on-site amenity space and substantial improvements to the quality of existing open space.
- iv. The development will provide a material net benefit in biodiversity through a significant amount of landscaping and planting of a range of species planted to encourage biodiversity.
- v. Improvements to the overall townscape to provide clearly defined public realm and landscaped areas.
- vi. Remediating and mitigating degraded, derelict, contaminated and unstable land, where appropriate, which will be one of the outcomes of the land acquisition strategy given the nature and existing uses of many of the target sites.
- vii. Improvements to the River Rom corridor and provision of riparian habitat during operation / occupation that will have a permanent beneficial effect on the River Rom that is significant at the Local level.
- viii. A new public route will be created along the river for use by pedestrians and cyclists and will include informal play and communal amenity space. The development has been designed to be predominantly car free, with a number of new footpath links through the site toward Romford Station and the town centre.
- ix. A range of energy and sustainability measures following the GLA's energy hierarchy, including:
  - High specification building fabric.
  - Site-wide energy centre utilising air source heat pumps and photovoltaic panels. All domestic and non-domestic units connected to this system.
  - Delivery of domestic and non-domestic carbon savings beyond building regulation requirements with carbon offset contribution required to achieve net zero-carbon scheme.
  - EV charging points provided to 20% of car parking spaces with infrastructure for future connectivity.
  - Water efficiency measures meeting London Plan target.
  - Construction in accordance with Circular Economy principles to reduce unnecessary waste

## **Bridge Close, Romford**

- 12.28 All of the above are considered to result in a significant improvement to the economic, social and environmental wellbeing of the area.
- 12.29 Circular paragraph 109.1 (bullet point 3) of the CPO Guidance considers whether the purpose for which the acquiring authority is proposing to acquire the land could be achieved by any other means.
- 12.30 The vision for the RDF and the Housing Zone is the transformation of a declining industrial area into a vibrant new residential community providing much needed new housing including affordable homes, as well as social, physical and green infrastructure with access to public transport and employment opportunities. The development will deliver up to 1,070 new homes, of which 35% will be affordable.
- 12.31 Within the Housing Zone there are some major sites that will be brought forward for development by house builders in accordance with the Housing Zone objectives. However, there are also sites, such as the Order Land, that require direct intervention from the Council as they are currently in fragmented ownership and cannot deliver the quality and scale of new housing (including affordable housing) required by the Masterplan and Planning Framework, without being assembled into larger comprehensive development sites which can be brought forward for development in a way which maximises the land's potential.
- 12.32 The Order Land is in multiple ownerships and, historically, attempts by the private sector to assemble the employment land at Bridge Close for development have failed. It is unlikely without the Council's intervention and the Housing Zone funding that a comprehensive scheme could be viably delivered.
- 12.33 If the CPO is not made, then the only way of acquiring the land and interests needed to deliver the development would be by agreement. Whilst it is recognised that implementation of a CPO is a matter of last resort, discussions to date have made it apparent that, unless the CPO is made and confirmed, it is unlikely that the Council, or a private developer, would be able to assemble the land and interests needed to bring forward a comprehensive housing development on the Order Land.
- 12.34 Without intervention the existing low value commercial land uses would remain in place and infrastructure would not be improved. It will also not be possible to facilitate comprehensive residential development and any residential development that might be brought forward is likely to be poor quality and piecemeal. It would fail to deliver the development outcomes and regeneration objectives planning policy envisages for the area and in particular the substantial levels of new affordable homes necessary to meet the objectives of the Housing Zone. The Order enables the Council to implement these wider objectives, including the infrastructure and amenity improvement.

### **Financial Viability**

- 12.35 Circular paragraph 109.1 (bullet point 4) of the Guidance considers the financial viability of the scheme for which the land is being acquired.
- 12.36 The Order Land is brought forward in accordance with the Council's regeneration objectives, including the delivery of a comprehensive and sustainable development, providing much needed housing, including affordable housing, and social infrastructure. The objectives of the development of the Order Land are set out at paragraphs 2.3-2.5 above.

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- 12.37 The development of the Order Land is being taken forward by the Council with the benefit of expert advice from its appointed team of consultants in relation to planning, land assembly and the Scheme's (and Varied Scheme's) commercial viability as set out in paragraph 10.8 above.
- 12.38 There is firm financial commitment and provision in the Council's Capital Strategy to progress the development and completion of the scheme as anticipated in the BCR LLP Business Plan. The delivery of the development of the Order Land is funded through the Council's Capital Strategy and Programme and received approval by Full Council on 26<sup>th</sup> February 2025. The envelope is funded predominantly by borrowing through the Housing Revenue Account (HRA) with social infrastructure in the form of the primary school and health centre being funded through the Council's General Fund.
- 12.39 In turn, funding of the school is recovered in whole or substantial part from the Department of Education (DfE) under the Wave 14 Free Schools Capital Programme and allocated s106 contributions. The investment in the health centre, delivered in Phase 2 of the Scheme, is underpinned by and subject to, agreement of lease arrangements for an appropriate scope through the NHS North East London Integrated Care Board. Should the NHS need for the health centre fall away, the space in Phase 2 of the Scheme would be leased under commercial arrangements in accordance with the planning consent. In respect of the Varied Scheme, the health centre would not be delivered and a contribution in-lieu would be provided through a s106 contribution. As it is currently unclear how the health centre would be funded and run by the health authority. A contribution in-lieu would provide more certainty and the ability for the health authority to fund an existing health care centre in need of financial contributions.
- 12.40 As set out above, the GLA has committed to provide funding of affordable housing units through the Homes for Londoners Affordable Homes Programme 2021-2026 (as amended). The amount of GLA funding would be reduced in the Varied Scheme is progressed – however, the Varied Scheme is viable and deliverable even with the reduction in GLA funding
- 12.41 Viability is underpinned by provision of a funding envelope that is sufficient to deliver the entire development (of either the Scheme or Varied Scheme), taking into account all costs of development and financing, and is reviewed and approved by the Council on an annual basis.
- 12.42 The Council has undertaken extensive financial modelling of the proposed development based on comprehensive assumptions, including the cost of land assembly, development costs and sales revenues. Each of these inputs has been subject to close review and it has been determined, following professional advice, that the development of land within the Order Land is capable of achieving a positive return.
- 12.43 Whilst the returns on investment fall short of returns that might be expected in the private sector relying on third party bank finance, the project delivers value for money on key regeneration parameters such as the cost and quantum of affordable housing and wider sustainability indicators. It compares favourably on financial performance criteria such as affordability and payback when benchmarked against typical providers of affordable housing. As such, the project is also viable in regeneration terms for the Council and BCR LLP.
- 12.44 To ensure the deliverability of the Scheme and Varied Scheme, the development of land within the Order Land is to be taken forward by BCR LLP and the Council, utilising a dedicated multi-disciplinary project team of skilled and experienced external practitioners

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and contractors who have the experience and expertise to carry out the works, having regard to the mixed-use nature and specific parameters of the scheme.

- 12.45 As is usual with regeneration projects, it is anticipated that construction of the development's initial phase will act as a catalyst for value growth, which will enhance the values of later phases.
- 12.46 There is therefore no impediment to the Scheme's delivery (nor the Varied Scheme's delivery) in terms of its viability.
- 12.47 It should also be noted that, as the Council will be taking the regeneration forward (rather than a private developer), its financial strategy is as much focused on its wider benefits, such as the meeting of housing targets, the delivery of affordable housing and the economic benefits to Romford town centre as it is in delivering a positive financial return.
- 12.48 In 2018 the Council agreed to provide the funding required to finance the estimated CPO costs for all the Order Land. The funding commitment has been renewed regularly since then as part of the annual update of the BCR LLP Business Plan and financial model. See Section [-] of this Statement for full funding details.
- 12.49 In addition to this, in order to facilitate the delivery of housing on Bridge Close the GLA, as part of the Romford Housing Zone, have allocated funding to initiate acquisition of property, support business relocations, deliver an east-west link and support ecological improvements to the River Rom.

### Summary

- 12.50 The overarching principle is that the Council, in seeking to exercise powers of compulsory acquisition, are able to demonstrate a compelling case in the public interest for the exercise of those powers. Evidence is also required to demonstrate that there is no impediment to enable the delivery of the development the proposed acquisition is intended to facilitate. These matters have been addressed above but, in summary:
- A hybrid planning application has been submitted for the development, setting out proposals for a residential lead, mixed-use development in accordance with the Council's vision and regeneration objectives. The Council's Strategic Planning Committee resolved to grant planning permission for the application on 28<sup>th</sup> August 2025, subject to the final direction from the Mayor of London and the completion of a Section 106 Agreement. Following the grant of planning permission, which is expected in December 2025, it is proposed to submit a Section 96a application and a Section 73 application to vary the planning permission in order to retain the LAS in situ. These applications are expected to be approved by September 2026. The variations to the planning permission would result in a loss of residential units, loss of affordable residential units, loss of flexible health centre / commercial floorspace, loss of public open space and would require a redesign of Phase 2 of the scheme.
  - Financial and physical resources are available to acquire the land and to deliver the regeneration scheme. The Council is operating with expert advice, governance, funding and development phasing already in place (paragraphs 8 to 8.14 above).
  - The scheme and Varied Scheme are grounded in a "clear strategic framework" and "planning framework", being the Romford Town Centre Development Framework (RDF) (paragraphs 4.18 to 4.6 above).
  - The regeneration of Bridge Close is a key deliverable for the Council as set out in the Submitted Local Plan, (paragraphs 6.8 to 6.13 above). Both the Scheme and Varied Scheme will deliver the comprehensive development of the Order Land and will be of a scale that can make meaningful contributions towards social infrastructure.

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- Negotiations have been undertaken with landowners and occupiers and businesses and residential relocation strategies are in place (section [15.6] below). To date, 48% of the Order Land has been acquired by negotiation.
- Through delivery of a regeneration scheme the housing stock will be significantly improved with an increased supply of Affordable Housing located in the administrative area of the borough (Section 3.0 above).
- Construction phases of the development will include training and employment opportunities for residents within the borough and contribute to social infrastructure. Further socio-economic benefits accrue to the local community by virtue of significant increase in local spend not only related to construction procurement but as a result of facilitating new business development and job creation on site.
- An in-principal agreement has been reached with HICC in relation to its relocation to 222-226 South Street. The LPA has confirmed that HICC's proposed use of the site is acceptable in principle, subject to detailed design. HICC's relocation and the development of 222-226 South Street will be funded through a combination of compensation from the Council, its own resources and third-party finance. As part of its agreement with the Council, HICC will provide a detailed funding plan.

### **13.0 Views expressed by Government Departments or Mayor of London on the scheme underlying the CPO**

- 13.1 The regeneration scheme benefits from support from the Greater London Authority ('GLA') and the Department for Education ('DfE').
- 13.2 As set out in paragraph 1.5 above and throughout this document, the Mayor of London has confirmed support for the regeneration through the approval of the bid for Housing Zone status, allocating funding for interventions specified in these zones for the purposes of unlocking or accelerating the delivery of housing, including within the Order Land<sup>7</sup>. Support was subsequently provided through entering into a Borough Intervention Agreement under which the GLA provided financial support for the acquisition by the Council of 214 shared ownership housing units<sup>8</sup>.
- 13.3 In March 2021, the GLA approved the reprofiling of the grant already committed through to support the Council in the buy-out of their JV partner, land assembly and other related costs to facilitate the development<sup>9</sup>. A Grant Agreement (Local Authority) in relation to the Homes for Londoners: Affordable Homes Programme 2021-2026 was entered into in January 2023 against which funding may be drawn in accordance with provisions in the agreement. Ongoing discussions with the GLA include provision for grant funding as part of the future Homes for Londoners: Affordable Homes Programme.
- 13.4 The DfE is supporting the regeneration of Bridge Close through the Wave 14 Free Schools Capital Programme in support of the delivery of the Unity Romford Primary School<sup>10</sup>. Engagement has taken place and continues in accordance with DfE governance arrangements. A business case has been submitted in for review and feasibility study is expected in the fourth quarter of 2025.

### **14.0 Human Rights and Equality**

#### **Human Rights Considerations**

<sup>7</sup> Romford was designated Housing Zone Status by the GLA decision MD1632 on 17<sup>th</sup> March 2016.

<sup>8</sup> The GLA made the decision, DD2215, to enter into a contractual commitment on 28<sup>th</sup> February 2018.

<sup>9</sup> GLA decision DD2507 of 4<sup>th</sup> March 2021.

<sup>10</sup> DfE announcement on 4<sup>th</sup> February 2020.

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- 14.1 The Human Rights Act 1998 ("the Act") incorporated into domestic law the European Convention on Human Rights ("the ECHR"). The ECHR includes provisions in the form of Articles, which aim to protect the rights of the individual.
- 14.2 Section 6 of the Human Rights Act 1998 prohibits public authorities from acting in a way, which is incompatible with rights protected by the ECHR.
- 14.3 As is clear from the CPO Guidance, a compulsory purchase order should only be made where there is a "compelling case in the public interest", and that a public authority pursuing a compulsory purchase order should be sure that the purposes for which it is making that order sufficiently justify interfering with the human rights of those with an interest in the land affected. In making this assessment, the authority should have regard, in particular, to the provisions of Article 1 of the First Protocol and Articles 6 and 8 to the ECHR. Article 14 of the Convention (prohibition of discrimination) is also relevant.
- 14.4 **Article 1 of the First Protocol of the ECHR** states: that "every natural or legal person is entitled to peaceful enjoyment of his possessions" and that "no one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by the law and by the general principles of international law....".
- 14.5 Whilst the owners of the land comprised in the Order Land would be deprived of their property if the Order is confirmed and thereafter implemented, this will be done in accordance with the law. The public benefits associated with the Order are set out in this Statement, and the Council considers that the Order strikes a fair balance between the public interest in seeing the regeneration proceed (which is unlikely to happen in the absence of the Order), and the private rights which will be affected by the Order.
- 14.6 In this case, despite efforts being made, the Council has not been able to secure agreements with all of the owners of the Order Land nor has it been possible to locate the owners of the land in "unknown" ownership. Such parties will be entitled to compensation calculated under the CPO Compensation Code in respect of land acquired by the Council pursuant to the Order through the Upper Tribunal (Lands Chamber).
- 14.7 **Article 6 of the ECHR** provides that: "in determining his civil rights and obligations ....everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law". The Article 6 rights are met by the procedures for objection and confirmation, the right to bring a legal challenge in the High Court under the Acquisition of Land Act 1981 and the right to have any claim for compensation determined by the Upper Tribunal.
- 14.8 The regeneration of the Order Land has been comprehensively consulted upon. There has been an opportunity to make representations regarding the planning policies that promote development of the Order Land. The Council has further entered into extensive discussions and negotiations with the affected landowners regarding the future of the area and the regeneration proposals.
- 14.9 Where parties object to the Order, the Secretary of State for the Ministry for Housing, Communities and Local Government shall arrange either for written representations, or, as is more likely, for a public hearing or local inquiry to be held to provide those parties with an opportunity to be heard. Should the Order be confirmed, a person aggrieved may challenge the order in the High Court if they consider that there are sufficient grounds for doing so. In relation to compensation disputes, affected persons have the right to apply to the Upper Tribunal, an independent judicial body. It is considered that this process is compliant with Article 6.



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- 14.10 **Article 8 of the ECHR** provides that: "everyone has the right to respect for his private and family life, his home and his correspondence" and that "there shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of.... the economic wellbeing of the country..."
- 14.11 If the Secretary of State confirms the Order, the compulsory acquisition of the interests in the Order Schedule will be necessary only if these have not already been acquired by agreement within the timescales required to deliver the next phase of the Scheme. As explained in Section 15.13 below, efforts to acquire the relevant interests are ongoing. Further, all those whose interests are compulsorily acquired will be entitled to fair compensation, such compensation to be determined independently by the Upper Tribunal (Lands Chamber), if it cannot be agreed.
- 14.12 Whilst there may be some interference with the rights of the owners of the land comprised in the Order, this will be done in accordance with the law. The Council is therefore of the view that there is a compelling case in the public interest for the compulsory acquisition of each and every parcel of land comprised in the Order Schedule. It is also satisfied that that the public interest that is to be served by the development and the wider social, environmental and economic benefits to be realised as a result of the regeneration proposals outweigh the necessary interference with the private rights and interests that exist in the Order Land. The Council therefore, considers that the benefits associated with the Scheme as set out in this report, strike a fair balance between the public interest in seeing the development proceed (which is unlikely to happen in the absence of the Order), and the private rights which will be affected by the Order.
- 14.13 In light of the above, the Council is of the view that there is a clear and compelling case in the public interest for the compulsory acquisition of each and every parcel of land and the rights comprised in the Order Schedule. It considers that the public interest that is to be served by the Scheme and the wider social, environmental and economic benefits to be realised as a result of the Scheme outweigh the necessary interference with the private rights and interests that exist in the Order Land. Appropriate compensation will be available to those entitled to claim it under the relevant statutory provisions. The Council, therefore, believes that in making the Order it has struck a fair and proportionate balance between the interests of those whose rights under the ECHR will be affected and the wider public interest.

### Equality Considerations

- 14.14 The public sector Equality Duty came into force on 5 April 2011.
- 14.15 The public sector equality duty under section 149 of the Equality Act 2010 ("PSED") requires the Council in exercising their compulsory purchase and related powers as acquiring authority to have due regard to: (i) the need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010; and (ii) the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it and foster good relations between the same. "Protected characteristics" are gender, race and disability, sexual orientation, age, religion or belief, pregnancy and maternity and gender reassignment.
- 14.16 The Council considers that it has given due consideration to the provisions of the Equalities Act 2010 and in particular its equality duty under Section 149 of the Act. Public Sector Equality Duty has been considered at each stage of the key decision-making for the Scheme. The Council undertook an initial Equalities Impact Assessment dated September

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2019 and additional Equalities Impact Assessment dated March 2023 and October 2025 pursuant to the Equality Act 2010 (Specific Duties) Regulations 2011, which came into force on 10 September 2011.

- 14.17 The Equalities Impact Assessment summarised that, generally, the redevelopment of the site improves the area over the existing situation, including improving housing quality, urban realm, security, access to jobs, and education provision, all of which may mitigate against potential differential impacts on a number of protected characteristic groups.
- 14.18 Overall, the assessment indicated that due regard has been taken when considering design principles, and that measures have been included to mitigate against potential differential impacts which may be experienced by some protected characteristic groups.
- 14.19 The assessment report provided an overall list of final recommendations. Those recommendations are set out below.

- i. **Design Principles.** Ensure that at the detailed design stage due consideration is given to all protected characteristics, and that the principles of good design are followed.

Principles of good and inclusive design showing due regard for protected characteristics has- and continues to inform detailed design development in accordance with the Council's public sector equality duty under the Equality Act 2010. These principles are enshrined in the Design and Access Statement (DAS) and the Design Code vision governing the design of future phases of the development.

Bridge Close Romford will be designed as inclusively as possible so that it can be comfortably and independently used by residents, staff, people visiting the development and the wider community regardless their age, ability or gender. The proposed development has been designed with consideration and understanding of the principles of inclusive design. The development therefore has been designed to meet the guidance of Approved Document M (Building Regulations 2010), and follow the principles of inclusive design defined by the Commission for Architecture and the Built Environment as:

- Places people at the heart of the design process;
- Acknowledges diversity and difference;
- Offers choice where a single design solution cannot accommodate all users;
- Provides for flexibility in use; and
- Provides buildings and environments that are convenient and enjoyable to use for everyone.

- ii. **Consultation.** This has been shown to be vitally important to the success or otherwise of other schemes throughout the country. This includes targeted consultation / engagement before the proposal is finalised, and ongoing monitoring and evaluation throughout the development and operational phases of the scheme. The October 2022 consultation substantially improved its contact with all Protected Characteristic Groups ("PCGs") and in future engagement, the views of all nine protected characteristic groups should continue to be considered. Care should also be taken when liaising with disability groups that all disabilities are represented, not just physical mobility.

Consultation events will continue to consider PCGs and build on the experience of previous events to enhance and improve the reaching of as many PCGs as possible.

Considered use of dedicated forums on social media and other appropriate means of contact may facilitate the inclusion and participation of a broader scope of PCGs.

- iii. A detailed **Signage and Wayfinding Strategy**. Whilst it is stated that 'legible and obvious' routes will be provided there is no detail on this as yet. It is proposed that this would form part of the detailed design phase. This should include input from an equality perspective as well as an aesthetic and contextual one. Consideration should be given to the use of pictograms, colour coding and different materials/textures alongside written words.

Principles of good and inclusive design showing due regard for protected characteristics will continue to inform detailed design development in accordance with the Council's public sector equality duty under the Equality Act 2010. These principles are enshrined in the Design and Access Statement (DAS) and the Design Code vision governing the design of future phases of the development.

- iv. **Segregated footway / cycleway** provision. Investigate ways to segregate cycles from pedestrians on the new bridge, on Bridge Close and in Neighbourhood Streets and Civic Square to enhance safety of everyone, and particularly the protected characteristic groups who are more likely to be walkers, specifically those with vulnerabilities such as the visually impaired, the hearing impaired and the ambulant impaired, who may choose not to go out at all in shared space areas due to safety concerns.

The approach with a shared route through the main public space has been reviewed during pre-application with Local Planning Authority Highway and Design Officers. A shared route through this area is preferred in order to reduce cyclists speed and reduce conflict with pedestrians, particularly given the gradient of the ramp. The considered use of appropriate signage and tactile surface materials to aid in the safe use of the bridge for the hard of hearing and visually impaired to provide will form part of the development of detailed designs.

- v. **Signalised Pedestrian Crossings**. Give consideration to enhancing the safety of crossing points by providing signals with push button units (with rotating cones for the deaf/blind) or zebra crossings to change the priority from road traffic to pedestrians.

The use of means for safeguarding and facilitating movement for all members of the community will be undertaken at the detailed design stage.

- vi. Provision of a **lift at New Bridge**. Space for the provision of a lift to connect Rom Bridge Place with the New Bridge should be safeguarded and the level of pedestrian traffic at the New Bridge monitored, with a view to incorporating the lift at a later date if deemed necessary.

The use of the pedestrian and cycle ramp and bridge forming the east-west connection across the site will be monitored in the context of safeguarding and facilitating movement for all members of the community and providing an inclusive design. Options for providing space and locating a lift by the new bridge will be undertaken at the detailed design stage.

- vii. **Materials / colour palette review**. As with the signage and wayfinding, a detailed review of surface materials, textures, colours and tones of all elements of the scheme is proposed. The Design Code stresses the considerations for materials should be supply, durability, longevity and ease of replacement or replication. The review should also be undertaken from an equality perspective to ensure the visually impaired and

those with cognitive disabilities such as dementia or autism, are not disorientated. Of particular note, consideration should be given to the provision of upstand kerbs, not less than 60mm, to protect blind and visually impaired people from straying into the road. Equally, colours and tonal differences should be reviewed, particularly including tactile paving, to ensure tonal differences to assist the visually and auditory impaired.

The use of materials across the site are set out in the Landscape Design and Access Statement. A detailed review of surface materials, textures, colours and tones of all elements of the scheme will be undertaken at the detailed design stage to use all means for safeguarding and facilitating movement for all members of the community.

- viii. Street Furniture review. Proposals state that consideration will be given to ensure open and communal spaces do not have street furniture that will create trip hazards. No further information on layout is available at this stage. A street furniture review should be undertaken from an equality perspective at the detailed design stage.

A street furniture review will be undertaken from an equality perspective at the detailed design stage.

- ix. Toilets. Consider providing toilet facilities or instigating a community toilet scheme with local businesses or retail outlets.
- x. Finally, due consideration should be given to the impacts on protected characteristic groups during the construction phase, where temporary disruption may differentially impact on PCGs. It is recommended that an Equalities review is undertaken on any Construction Management Plan, or similar.

An update to the Equality Impact Assessment will be undertaken during procurement of demolition and main contractors and leading up to the appointment, including the review of any Construction Management Plan proposed.

- 14.20 As such, designs have been and continue to be reviewed, taking into account potential adverse impacts on members of the community with shared characteristics, and the means of mitigating the impact.
- 14.21 Further initiatives have been progressed pursuant to the Council's consultation and engagement with local owners and occupiers in accordance with the Relocation Strategy (for further details see section 15.0) and related Action Plan, which sets out how to treat existing tenants and relates to the Relocation Strategy.

### **Equalities and Human Rights Summary**

- 14.22 The Council has proactively negotiated with interested parties from inception and continues to do so and is only employing the use of a CPO as a last resort.
- 14.23 The Council is committed to improving the quality of life and wider participation for all in the economic, educational, cultural, social and community life of the Borough. The development will provide a much needed mix of affordable and private sale properties. The new mixed tenure housing will improve the community cohesion in the area. It will provide increased choice and opportunity for Havering residents. This supports the overall aim of the Council's Equalities Policy and the Council's duties under the Equalities Act 2010.
- 14.24 At present the Order Land does not reflect a mixed and balanced community, with a heavy bias towards commercial and inappropriate mainly private tenanted housing stock. The

development proposals seek to address this imbalance through the delivery of a range of residential tenures across the site e.g. private housing, a new range of intermediate housing, wider range of unit sizes across all tenures and 10% of all residential units meeting Wheelchair standards.

- 14.25 All landowners, commercial and residential occupiers who are located within the CPO Red Line Plan area will be affected by the implementation of the Compulsory Purchase Order. The Council will continue to endeavour to reduce this effect by extensive consultation and through the relocation strategies, see section 15.0 below. Consultation has and will continue to be undertaken with the commercial and residential owners and wider community to ensure that the development reflects local and Borough needs.
- 14.26 Having had due regard to its duty under the Equality Act 2010, the Council is confident that the delivery of the development will contribute towards improvement of the social, economic, educational and cultural improvements for existing and future residents.

### 15.0 Efforts to Acquire and Relocation Strategy

- 15.1 Paragraph 2 of the CPO Guidance states that:

*"2.1 Acquiring authorities should use compulsory purchase powers where it is expedient to do so and where there is a compelling case in the public interest to make a compulsory purchase order..*

*2.2 The confirming authority will expect the acquiring authority to demonstrate that they have taken reasonable steps to:*

- understand the impact of the exercise of the compulsory purchase powers included in the compulsory purchase order and the acquisition of a person's interest in the land on those persons, for example affected owners and occupiers, through direct engagement with those parties*
- attempt the acquisition of all of the land and rights included in the compulsory purchase order by agreement*

...

*2.7 Where acquiring authorities secure the acquisition of land by agreement, they may pay compensation as if it had been compulsorily purchased, unless the land was already on offer on the open market*

*2.8 Compulsory purchase is intended as a last resort to secure the assembly of all the land needed for the implementation of projects. However, an acquiring authority does not need to wait for negotiations with affected parties to break down or for the affected parties to begin to engage with them before starting the compulsory purchase process in parallel with negotiations. Delaying the start of the compulsory purchase process can result in valuable time in progressing a project being lost. Therefore, depending on when the land and/or rights are required, it may often be sensible, given the amount of time required to complete the compulsory purchase process, for the acquiring authority to:*

- plan a compulsory purchase timetable as a contingency measure*
- initiate formal procedures*

*2.9 This will also help to make the seriousness of the acquiring authority's intentions clear from the outset, which in turn can encourage those whose land is affected to enter more readily into meaningful engagement. In starting these procedures, the acquiring authority should make it clear that it is willing to continue to engage with affected parties to purchase land by agreement."*

15.2 In compliance with Paragraph 2, the Council and its previous private sector development partner have been actively negotiating with owners since 2016 to acquire all interests in the Order Land, set out in the schedule of interests in the CPO. In addition, Ardent has been appointed by the Council to value and actively negotiate with all affected parties with a view to acquiring their interests by agreement wherever possible including possible options for the relocation of business interests.

15.3 Ardent has met with as many of the landowners as possible and undertaken inspections in order to provide the Council with accurate valuations for each property to establish potential acquisition costs and to enable offers to be made. Contact has also been made with occupiers to understand their requirements in terms of relocation premises and to identify any specific issues that will need to be addressed as a result of properties being acquired. The Council has employed a firm of local commercial property agents, Mass & Co., to assist business occupiers identify and secure new premises.

15.4 In engaging with property owners, the Council has also taken account of Paragraph 17 of the Guidance:

*"17.1 Undertaking negotiations and engagement prior to, and in parallel with, preparing and making a compulsory purchase order can help build good working relationships with those whose interests are affected. Acquiring authorities should be open and honest with those whose interests are affected and treat their concerns with respect. This includes statutory undertakers and similar bodies as well as private individuals and businesses. Early communication with those whose interests are affected in the preparation of a compulsory purchase order will assist the acquiring authority understand more about:*

*(a) the land and rights it seeks to acquire*

*(b) the impact of the exercise of the compulsory purchase powers included in the compulsory purchase order on those whose interests are affected*

*(c) the amount of compensation which may be payable to those with an interest in the land if the compulsory purchase powers were to be exercised*

*(d) any physical or legal impediments to development that may exist*

15.5 In consideration of the Guidance, the Council has taken the following steps:

- All freehold landowners have been contacted and at least one offer has been made for all freehold property interests. A flexible approach has been adopted to the offers, so that property owners have the choice of an immediate purchase, a subject to contract purchase, or an option agreement.
- Where agreement on values cannot be reached, landowners have been offered the option of an Independent Valuation process as a form of Alternative Dispute Resolution.
- All tenants and other occupiers have been contacted so that the impact of the CPO and their relocation requirements can be discussed. Tenants and occupiers have been

## **Bridge Close, Romford**

offered option agreements which provide them with 'not before dates' for acquisition and set out the basis on which compensation will be paid.

- Relocation pro-forma allowing the full details of relocation requirements to be set out have been provided to occupiers, for return to the Council.
- An acquisition strategy has been prepared and is being implemented.
- A business relocation strategy has been prepared and is being implemented.
- Where business owners are nearing retirement and would qualify for the payment of compensation on the basis of the value of their business, the Council has made equivalent payments by agreement where this has been the business owner's preference.
- A programme has been put in place to deal with the relocation and compensation of residential tenant occupiers.
- Offers to pay reasonably incurred professional fees have been made to landowners and occupiers.

### **15.6 Existing ownership within the Scheme**

#### **Council Ownership**

- 15.7 The Council owns approximately 41% of freehold and long leasehold interests in the Order Land (65% by area). When allowing for public land or unregistered land which will automatically transfer to the Council, the ownership interest increases to approximately 79% (70% by area).

#### **Third Party Ownership**

- 15.8 There are 11 commercial freehold and 2 commercial long leasehold interests in 3rd party ownership in the Order Land.
- 15.9 There are 5 residential freehold interests in 3rd party ownership in the Order Land.

#### **Negotiations**

- 15.10 The Council have sought to acquire all of the required interests within the Order Land by agreement, as summarised in the following paragraphs.
- 15.11 As would be expected for a scheme of this size, there remain a number of interests where it is expected that compulsory purchase powers will need to be exercised either because reasonable terms cannot be agreed for private treaty acquisition or because it has been difficult to make contact with the owner or occupier.
- 15.12 As required by best practice, the Council will continue to seek to acquire the outstanding interests within the Order Land by agreement. However, the Council considers that it is highly unlikely that it will be able to achieve the assembly of the entirety of the Order Land by agreement within a reasonable timescale without the use of compulsory purchase powers.

### **15.13 Efforts to acquire commercial interests**

## Bridge Close, Romford

15.14 The Council has engaged with all commercial owners and continues to seek to acquire commercial property interests through private treaty. As a result, and in accordance with the Guidance, a number of commercial properties have been acquired by the Council, either directly or through Bridge Close Regeneration LLP as set out below:

- Bridge House (1 Bridge Close)
- 2 Bridge Close
- 3 Bridge Close
- 4 Bridge Close (freehold only)
- 6 Bridge Close
- 8 Bridge Close
- 10 Bridge Close
- 12 Bridge Close (freehold only)
- 12a-c Bridge Close
- 12c-e Bridge Close
- 13 Bridge Close
- 13A Bridge Close

15.15 In relation to the acquisitions of 12a-c and 12c-e, three businesses have relocated. On acquisition of these properties, flexible leases were granted to the former owners in order to mitigate any adverse impacts of the transition and safeguard business continuity while fit-out works and repairs were being carried out on relocation properties.

15.16 A number of commercial property interests remain to be acquired. The following provides a status summary for each of the commercial interests within the Order Land where discussions and engagement are ongoing:

### **1 Bridge Close**

15.17 Discussions to acquire the freehold interest by agreement commenced in September 2018. Offers inclusive of statutory loss payments have been made on three occasions. The primary issue that has prevented acquisition is the owner advancing a development value argument, which the Council has resisted on the basis that piecemeal development of small individual properties at Bridge Close is unacceptable in planning terms. The owner's approach therefore leads to an inflated land value. Although negotiations reached an impasse in 2019-2020, in July 2022, discussions re-commenced with the owner confirming that, although their development value argument remains, they were willing to discuss values on an existing use basis.

### **4 Bridge Close**

15.18 Discussions to acquire the long leasehold interest (999 years) by agreement commenced in February 2018. Offers inclusive of loss payments have been made on two occasions. The failure to agree terms results primarily from the landowner's contention that they are unable to identify a suitable relocation property. While efforts have been made to progress negotiations on value, the owner has preferred not to engage until a relocation property has been sourced.

### **5 Bridge Close**



## **Bridge Close, Romford**

- 15.19 Discussions to acquire the freehold interest by agreement commenced in May 2018. An offer inclusive of loss payments was made in May 2019. Issues preventing acquisition have included difficulties sourcing a suitable relocation property, as well as the owner requiring the Council to accept responsibility for the cost of consolidating their site at Bridge Close with another site located approximately 2 miles away, which is not impacted by the proposed CPO. This has been resisted on the basis that, were a CPO to be confirmed, the owner would only be able to claim compensation for his property at Bridge Close and could not claim compensation to relocate a second site not affected by the CPO. While efforts have been made to progress negotiations on value, the owner has preferred not to engage until a relocation property has been sourced.

### **7 Bridge Close**

- 15.20 Discussions to acquire the freehold interest by agreement commenced in September 2018. An offer inclusive of loss payments was made in December 2019. The failure to agree terms results primarily from the landowner's contention that they are unable to identify a suitable relocation property. While efforts have been made to progress negotiations on value, the owner has preferred not to engage until a relocation property has been sourced.

### **11 Bridge Close**

- 15.21 Discussions to acquire the freehold interest by agreement commenced in June 2018. Offers inclusive of loss payments have been made on three occasions. Issues preventing agreement and acquisition relate to a difference in opinion of value in relation to the property and occupying business.

### **12 Bridge Close**

- 15.22 Terms to acquire the long-leasehold interest, but subject to the grant of planning permission by a certain date, were agreed between the owner and the Council's former JV partner in 2016. The agreement was novated to BCR LLP on its establishment. The long-stop for satisfaction of the planning condition expired in March 2020 and the agreement was formally terminated in December 2024. Two offers in accordance with Guidance have since been advanced without agreement.

### **14 Bridge Close**

- 15.23 Discussions to acquire the freehold interest by agreement commenced in May 2018. Offers inclusive of loss payments have been made on three occasions. A suitable relocation property was acquired in August 2025 therefore the only remaining issue preventing acquisition is a difference in opinions on value.

## **Ambulance Station, Old Church Road**

- 15.24 The site is owned and occupied by the LAS. The planning permission (and therefore the Scheme) requires acquisition of the LAS site. The Varied Scheme retains the existing LAS building onsite during the implementation of Phase 1 and only requires a sliver of the site comprising approximately [303] sqm of hardstanding to the north. The sliver is required to facilitate the delivery of the school and an emergency fire access route to the rear of the new school.
- 15.25 The sliver is presently used to park around 10 ambulance vehicles and there is a roller shutter door to the rear that, following the acquisition, will no longer be usable as a secondary access/egress for vehicles. To ensure the existing operational effectiveness of LAS is maintained prior to the acquisition of the sliver, properties next to the LAS site have

## **Bridge Close, Romford**

been acquired and clear land will be made available to LAS in perpetuity to ensure the spaces lost are re-provided. Further, appropriate arrangements are in place to ensure meanwhile car parking is provided during construction of the replacement parking facility.

- 15.26 Access to and egress from the LAS building will remain substantially unaffected by the varied scheme and any potential issues have been mitigated.
- 15.27 Since 2016 the Council have made efforts to acquire the entire freehold interest of the LAS site. Despite LAS and the Council working closely together to identify potential relocation properties, a whole site acquisition and relocation to a replacement site has not proved possible, primarily owing to LAS funding and resourcing constraints.
- 15.28 The Council recognises the importance of the services provided by LAS to the local community and has confirmed its commitment to ensure that with the acquisition of the sliver, the existing operational effectiveness of LAS is maintained in perpetuity.
- 15.29 The submission of the s96a and s73 applications following the grant of planning permission and their subsequent approval by the Council thereafter, will therefore enable the LAS to be retained in situ, negating the requirement for relocation. This Varied Scheme will mitigate and avoid a key impediment to the delivery of the regeneration scheme but would result in a reduction in housing quantum and community facilities delivered.

### **9 Bridge Close / 91 Waterloo Road**

- 15.30 Discussions have been held with HICC since 2016 with a view to securing a relocation solution that meets with HICC's requirements. These discussions have included consideration of both on and off-site options, although both the Acquiring Authority and HICC now agree that an on-site relocation is unworkable within the context of the granted planning permission. An alternative site within Romford Town Centre, 222-226 South Street, which HICC has confirmed as acceptable to HICC, has been identified and the Council has been working with HICC to acquire this site by agreement. However, agreeing the terms of a negotiated private treaty purchase has, to date, not been possible and so 222-226 South Street has been included within the red line boundary of the CPO in the event an acquisition cannot be agreed through negotiation, and the Council has to acquire the site compulsorily as a final resort. The Council has also agreed to fund a planning application for HICC's new building, consistent with its obligation to pay statutory compensation for the equivalent reinstatement of HICC's existing premises. HICC has had two pre-application meeting with the Local Planning Authority ('LPA') and submitted its development proposals to a Quality Review Panel ('QRP') in September 2025. The application was considered by the Strategic Planning Committee on 13 November 2025. It is envisaged that a planning application will be submitted imminently. Both the LPA and QRP have confirmed that they welcome the delivery of a new facility for HICC in Romford Town Centre.
- 15.31 The Council is also looking to enter into a relocation agreement with HICC. Solicitors were instructed to draft and settle the agreement in July 2025, and on 6 November 2025, HICC and the Council met, with their solicitors and surveyors in attendance, with a view to agreeing the last outstanding points of principle to be agreed. Completion of the agreement is expected to be achieved in the early part of Q1 2026. The parties are also in discussions over compensation and the arrangements for HICC to fund any shortfall between its compensation and the cost of re-providing a new facility. These arrangements will be recorded in a Funding Method Statement pursuant to the terms of the agreement between the parties.

## **Bridge Close, Romford**

- 15.32 HICC will only be required to move from the majority of its existing premises when the final phase of the Scheme is implemented and the Council and Ardent is working with HICC in an attempt to ensure that the service it provides to the local community will not be interrupted.
- 15.33 The Council is also in dialogue with other faith groups at Bridge Close, although these groups generally only occupy under short term leases/licences/tenancies at will and have temporary or lapsed planning permissions for their use. The Council is nonetheless working with them and providing assistance aimed at helping them successfully relocate.

### **222-226 South Street**

- 15.34 Discussions with the freehold owner of 222-226 South Street and its agent have been ongoing since June 2022, at which point the site was being offered on the open market for sale as a development opportunity. The Council made an offer for the site in March 2023. Although the site has now been withdrawn from the market, discussions between the Council and the site's owner continue and the Council wrote to the owner in April 2024 advising that if a negotiated agreement could not be reached, as a last resort, the Council would include the site within the CPO. The owner has confirmed that he is willing to sell to the Council, subject to agreeing a price; these negotiations are ongoing.

### **15.35 Efforts to acquire residential interests**

- 15.36 In total, there are 37 freehold residential properties located within the Order Land which have been or are currently owned by either private investors or owner occupiers. The residential properties front either Waterloo Road to the western side of the CPO Red Line Plan or Oldchurch Road which is located on the southern side of the Order Land. Of the 37 residential properties, the Council has successfully reached agreement with 32 property owners.
- 15.37 The following provides a status summary for each of the remaining five residential property interests within the Order Land where acquisition discussions and engagement remain ongoing:

#### **103 Waterloo Road**

- 15.38 Discussions to acquire the freehold interest by agreement commenced in June, 2016. The freehold owner instructed a surveyor to prepare a valuation report and deal with negotiations on their behalf. The Council paid the surveyor's fees directly. Negotiations progressed and Heads of Terms were drafted in September 2019, on the basis of an agreed Market Value of £380,000, plus other compensation, for an overall purchase price of £437,100. However, the owner subsequently decided not to progress with the sale of the property and terminated his surveyor's instructions. Discussions continue with the owner, but there remains a difference in opinion over the property's value.

#### **111 Waterloo Road**

- 15.39 Discussions to acquire the freehold interest by agreement commenced in June, 2016. Offers inclusive of loss payments have been made on two occasions, the first in June 2019 and the second in May 2020. Ardent wrote to the owner in March 2023 and have continued to chase on a regular basis, but no response has been received.

#### **143 Waterloo Road**

## **Bridge Close, Romford**

- 15.40 Discussions to acquire the freehold interest by agreement commenced in June, 2016. Due to the owner's limited command of English, correspondence has been translated into Mandarin. An offer was forwarded to the owner in October 2019 which was re-affirmed in January 2020. Having had no response to the offer, Ardent wrote to the freeholder in April 2023 and July 2023 to re-open discussions and to provide an update on the progress of the Scheme. A face-to-face meeting was arranged with the owner and a translator in September 2023 but negotiations were inconclusive and there remains a difference in opinions of value.

### **145 Waterloo Road**

- 15.41 Discussions to acquire the freehold interest by agreement commenced in June 2016. The owner is professionally represented. An offer was made in September 2019 which was re-affirmed in July 2023. Discussions between Ardent and the owner's surveyor progressed subsequently and resulted in an increased offer in July 2023. Negotiations remain on-going but there remains a difference in opinions of value.

### **30 Oldchurch Road**

- 15.42 Discussions to acquire the freehold interest by agreement commenced in April 2019. Initially, local surveyors, Hilbery Chaplin, advised the Council and attempted to arrange access to undertake an inspection of the property during April, May and June 2019 in order to prepare a valuation report. However, access was not granted. Ardent was then instructed to deal with the property from October 2021. Since their instruction, Ardent have continued to attempt to arrange an inspection of the Property and have provided various dates to the owner when they would be available to inspect. However, Ardent was advised that the inspection needed to be postponed indefinitely due to a family health issues and so an inspection of the property has not yet been undertaken. This has prevented an offer being made.

### **15.43 Acquisition of Rights**

- 15.44 The Council have contacted those with an interest in the land over which new rights are required in order to deliver the regeneration scheme with a view to obtaining the necessary rights by agreement.

### **15.45 Owners of Rights**

- 15.46 There are a significant number of other rights and similar interests which affect parts of the Order Land. These are mainly rights attaching to freehold or leasehold interests within the Order Land, and the relevant rights would fall away once those interests are acquired by the Council.

### **15.47 Unknown Owners**

- 15.48 There are three unknown or uncontactable owners: Trolara Trading (dissolved company); Apollonia Palmer (deceased); and Henry Seymour (no response).
- 15.49 The company Trolara Trading is dissolved. The company was incorporated in Cyprus and it might be that this ownership has reverted to the Crown - legal advice is being taken in this regard.

## **Bridge Close, Romford**

### **16.0 Special Considerations affecting the Order Land**

- 16.1 There are no areas of special category land (such as open space, commons or allotments) included within the Order Land.
- 16.2 There are no listed buildings, or ancient monuments within the Order Land. The Order land is not within a conservation area and there are no issues concerning consecrated land, renewal area or open space.
- 16.3 The proposals comprise the redevelopment of previously developed land that is free from any environmental, archaeological, landscape or ecological constraints.

### **17.0 Associated Orders**

- 17.1 Paragraph 15 of the CPO Guidance requires acquiring authorities to be able to show that the scheme is unlikely to be blocked by any physical or legal impediments to implementation. It references the programming of any infrastructure accommodation works and the need for any planning permission or other consent or licence.
- 17.2 As set out in Section 7.0 of this Statement, planning permission is expected in the fourth quarter of 2025.

#### **Stopping-up Order**

- 17.3 Approximately 8,500 square metres of the development site is currently adopted public highway. This highway land comprises the main vehicular access into the site and internal access roads (including Bridge Close itself), footpaths and hard standings. It also includes multiple plots forming the pavements, verges, and landscaping along the western site boundary along Waterloo Road and the southern boundary along Oldchurch Road. Further plots are included at the junction of Union Road and Waterloo Road.
- 17.4 These plots all comprise adopted public highway, over which highway rights would need to be extinguished in order to facilitate the development. The London Borough of Havering is the Highways Authority for the relevant public highways and the majority of the plots are in the ownership of the London Borough Havering.
- 17.5 Section 247 (2A) of the Town and Country Planning Act 1990 ("the Act") empowers the Council to, by order, authorise the stopping up of any highway in accordance with the hybrid planning permission P1765.23, which is expected in the fourth quarter of 2025, if it is satisfied that it is necessary to do so.
- 17.6 Arrangements are now underway with a view to stopping up the public highway within the development site boundaries, to be secured via one or more stopping up orders under section 247 of the Town and Country Planning Act 1990 pursuant to the hybrid planning consent in place.
- 17.7 The required application(s) to secure the stopping up order(s) are being progressed by BCR LLP. As the relevant highway land is predominantly in the ownership of the Council, opposition to the proposal is not anticipated. In the event that any objections made before the making of the Order cannot be resolved, and the Mayor of London directs that an inquiry is necessary, such an inquiry would be conjoined with any inquiry relating to the Order.

## **Bridge Close, Romford**

### **18.0 Government policy statements**

- 18.1 The relevant statements concerning planning requirements have already been addressed in the previous sections of this Statement.
- 18.2 There are no other relevant policy statements applicable to the Order.

### **19.0 Conclusion**

- 19.1 The implementation of the Scheme or the Varied Scheme as part of the Housing Zone will result in the transformation of Bridge Close and the wider area. The removal of secondary, basic quality commercial buildings from Romford Town Centre and replacement with a high-quality mixed-use development will create balanced, mixed and inclusive communities. This will directly result in an improved quality of life for the community including both existing and future residents. In order to achieve this, the compulsory acquisition of interests in the Order Land specified in the Schedule to the Order will be required so that the Scheme can be delivered within a reasonable timescale.
- 19.2 The acquisition of 222-226 South Street as part of the regeneration scheme will allow HICC to be relocated, thereby protecting the important role it provides the local and wider east London community. No alternative sites acceptable to HICC for its relocation have been identified.
- 19.3 Without the Order as a means of intervention, the existing low value commercial land uses would remain in place and it would not be possible to facilitate the comprehensive residential development that the regeneration scheme will provide. Any residential development that might be brought forward would likely be poor quality and piecemeal, failing to deliver the development outcomes which policy envisages for the area and substantial levels of new affordable homes. It would also fail to deliver the required housing mix, tenures or typology necessary to meet the objectives of the Housing Zone. The Order enables the Council to implement these wider objectives, improve infrastructure and enhance the amenity of the area.
- 19.4 The target acquisition sites at Bridge Close are characterised by low value, low density commercial and light industrial uses or low density housing which do not enable the change in land use and transformation envisaged in regional or local planning policy or facilitate the vision of the Council to create a vibrant new residential community in the area. Many of the businesses are considered to detract from the visual amenity and environmental quality of the area with operations often over spilling directly onto road frontages, in some cases creating a negative visual and environmental impact.
- 19.5 While tenants occupy 222-226 South Street, the redevelopment of the site is proposed in any event and the tenants all either hold short term leases, or leases with break clauses allowing development to take place.
- 19.6 The application for the Order is also intended to achieve wider regeneration objectives set out in the Masterplan and RDF. The Bridge Close regeneration includes public realm improvements centred around the River Rom, and the delivery of a clearly defined east-west pedestrian/cycle route linking the Ring Road pedestrian crossing to a new River Rom crossing and to the rail station via Atlanta Boulevard. This will provide a link between the growing residential areas to the west of the town through to a proposed southern entrance to Romford station.
- 19.7 The benefits of the Bridge Close regeneration include the creation of a new sustainable residential neighbourhood with supportive social and physical infrastructure (including

## Bridge Close, Romford

which would act also as catalyst for economic growth, with the economic multiplier effect impacting positively on the local community. The delivery of the Housing Zone objectives will also direct investment and development activity in the area. The social benefits include the creation of a mixed, balanced, community with its own identity in a well-designed space for living, working and leisure thereby promoting social cohesion and wellbeing. The relocation of HICC to 222-226 South Street will protect the social function it currently provides and allow it to expand to meet the needs of the growing Muslim population in the surrounding area).

- 19.8 The environmental benefits include remediating and mitigating degraded, derelict, contaminated and unstable land, where appropriate, which will be one of the outcomes of the land acquisition strategy given the nature and existing uses of many of the target sites. Improvements to the River Rom corridor and provision of riparian habitat during operation / occupation will have a permanent beneficial effect on the River Rom that is significant at the Local level.
- 19.9 The Council considers that the Scheme and Varied Scheme will bring about the transformation of a Housing Zone Area which it has identified as a "priority housing estate for regeneration," and is satisfied that there is a compelling case in the public interest for the Order to be confirmed so as to secure the redevelopment and improvement of the Order Land as part of the Housing Zone. This will result in significant improvement in the economic, social and environmental wellbeing of the Council's area.
- 19.10 Confirmation of the Order will enable the regeneration of the Order Land to take place in accordance with a managed programme, providing certainty for land assembly and implementation of the regeneration. Such certainty will contribute towards the achievement of the Council's regeneration objectives for the Order Land and the wider Housing Zone as set out in adopted policy.
- 19.11 The Council has contacted all freeholders, leaseholders and other occupiers within the Order Land inviting them to enter into negotiations with a view to securing acquisition of their interests by agreement. These negotiations will continue in parallel with the compulsory purchase process. However, it currently appears unlikely the Council will be able to acquire all the necessary interests by private agreement within a reasonable timescale. Compulsory powers are being sought so that, in the event that the Council is unable to acquire all the necessary interests by private agreement within a reasonable timescale, development of the Order Land can still proceed.
- 19.12 The Council is satisfied that there are no planning or other impediments to the implementation of the redevelopment of the Order Land. Having regard in particular to the benefits to be achieved from the regeneration proposals, the low density and the poor quality of existing accommodation and the built environment in which it currently exists, the Council considers the use of compulsory purchase powers to be necessary and justified.
- 19.13 For the reasons summarised in this Statement, the Council considers the Order to be within the necessary statutory powers and that a compelling case exists in the public interest for the making and confirmation of the Order.
- 19.14 The Council, therefore, requests the Secretary of State to confirm the Order to facilitate the regeneration of the Order Land.

## 20.0 Additional Information

## Bridge Close, Romford

### General Information

- 20.1 Persons requiring further information regarding the Order should contact [ ] at the Council by email to [BridgeClose@haverling.gov.uk] or by telephone on [01708 434434].
- 20.2 Owners and occupiers of the Order Land who wish to negotiate a sale or discuss matters of compensation should contact [Arden Management Limited] or by telephone on [ ].

### Compensation

- 20.3 Provision is made by statute with regard to compensation for the compulsory purchase of land and the depreciation in the value of affected properties. More information is given in the series of booklets published by the Ministry for Housing, Communities and Local Government entitled 'Compulsory Purchase and Compensation' Listed below:
- Booklet No 1 - Compulsory Purchase Procedure;
  - Booklet No 2 - Compensation to Business Owners and Occupiers;
  - Booklet No 4 - Compensation to Residential Owners and Occupiers.
- 20.4 Copies of these booklets are available on-line through the following link:  
[www.gov.uk/government/collections/compulsory-purchase-system-guidance](http://www.gov.uk/government/collections/compulsory-purchase-system-guidance).



**APPENDIX A Map of the Order Land**

**[ Attached Separately / To Be Inserted ]**

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**[ Attached Separately / To Be Inserted ]**

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**APPENDIX C Statement of Commitments**

**[ Attached Separately / To Be Inserted ]**

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**APPENDIX D Documents Referred to in This Statement of Reasons**

1. National Planning Policy Framework National Planning Policy Framework:  
[www.gov.uk/government/publications/national-planning-policy-framework--2](http://www.gov.uk/government/publications/national-planning-policy-framework--2)  
London Plan: <https://www.london.gov.uk/what-we-do/planning/london-plan>
2. Core Strategy and Development Control Documents Development Plan Documents  
(adopted 2008)(Withdrawn): [Core Strategy and Development Control Policies Development Plan Document \(havering.gov.uk\)](#)
3. Havering Local Plan (adopted in 2021): [Local Plan 2016-2031 Adopted 2021 \(havering.gov.uk\)](#)
4. Romford Town Centre Development Framework (November 2015): [Romford Development Framework 2015 \(havering.gov.uk\)](#)
5. Strategic Planning Committee Minutes, 28<sup>th</sup> August 2025. Resolution to grant planning permission in respect of hybrid planning application with reference P1765.23.
6. Minutes of A Cabinet Meeting, Council Chamber, Town Hall, Wednesday [ ] and Report of the same date: [Browse meetings - Cabinet | London Borough of Havering](#)
7. Statement of Community Involvement
8. Bridge Close land Acquisition Strategy
9. Bridge Close Land Assembly Equality Impact Assessment

The National and London planning policies are available online but copies can be made available on request by contacting [ ].