

**OPTIMISATION DEVELOPMENTS
LTD.**

**LAND AT ROM VALLEY WAY,
ROMFORD**

PLANNING & RETAIL STATEMENT

NOVEMBER 2012

PREPARED AT THE OFFICES OF

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1. INTRODUCTION

- 1.1 This Planning and Retail Statement has been prepared by Chase & Partners on behalf of Optimisation Developments Ltd., a wholly-owned subsidiary of Morrison's Supermarkets Ltd. (Morrison's).
- 1.2 It is submitted in support planning application for a mixed use development comprising foodstore, residential development, car parking and petrol filling station together with associated access and landscaping on the site of the Romford Ice Arena at Rom Valley Way, Romford.
- 1.3 The 'hybrid' application seeks:
- Detailed planning permission for the erection of a foodstore within Class A 1(Retail) Use, petrol filling station, associated parking and landscaping together with changes to the existing access off Rom Valley Way and the formation of a new access/egress for service vehicles and egress for customers onto Rom Valley Way; and
 - Outline planning permission for a residential scheme of up to 71 residential units comprising a mix of 3 bed roomed town houses and two blocks of 1 and 2 bed flats. This element of the application seeks approval solely for the proposed means of access, with all other details to be dealt with as Reserved Matters.
- 1.4 This Planning Statement sets out the background to the proposals, the planning policies relevant to determination of the application, and assesses the proposal against those policies.
- 1.5 The application itself comprises the application forms and associated Notices, application plans together with this Statement and other supporting documentation – including:
- A **Design & Access Statement**¹ prepared by Collado Collins which incorporates a landscape appraisal prepared by Smeeden Foreman;
 - A **Transport Assessment** and **Staff Travel Plan** prepared by Mayer Brown Partnership;

¹ prepared in accordance with the requirements of Circular 01/06 and accompanying Good Practice Guidance

- A **Sustainable Energy Statement** and **Sustainability Statement** produced by b:ssec; and
- A **Statement of Community Engagement** prepared by Carmargue

1.6 Following submission of an application for a Screening Opinion² in July 2012, it was confirmed that, based on the information submitted, the proposals did not constitute a development that would require Environmental Impact Assessment. It was agreed, however, that the following additional assessments would be submitted in support of the application:

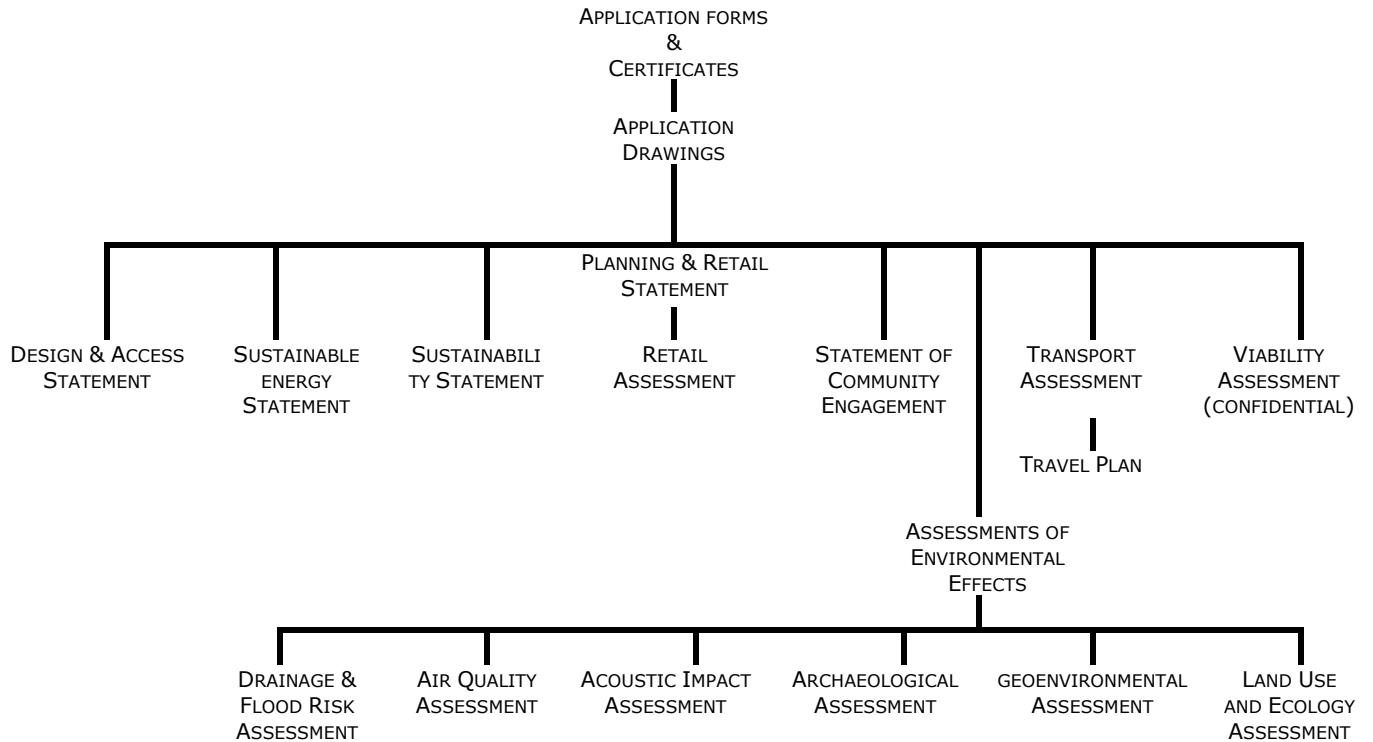
- A **Drainage and Flood Risk Assessment** prepared by BSCP;
- An **Air Quality Assessment** prepared by Atkins;
- An **Acoustic Impact Assessment** prepared by Belair Research Ltd.;
- A Preliminary **Archaeological Assessment** prepared by Archaeology South East;
- A **Geoenvironmental Assessment** – including a Preliminary Site Investigation Report, Geoenvironmental Assessment and Ground Gas Risk Assessment prepared by Sirius Geotechnical and Environmental Ltd; and
- A **Land Use and Ecology Assessment** prepared by Penny Anderson Associates.

1.7 Finally, the Council is also being provided, under separate cover, confidential information on the project viability. This is designed to address the matter concerning the absence of affordable housing in the application proposals.

² under Regulation 5 of the Town & Country Planning (Environmental Impact Assessment) (England & Wales) Regulations

1.8 Diagrammatically, the structure of the application is shown in Table 1 below:

Table 1: Structure of Application



1.8 The remainder of the Statement is set out as follows:

- **Section Two** provides a description of the application site and surrounding area and provides the background to the proposals and details of the application itself;
- **Section Three** then sets out the planning policy context within which the application proposals should be considered. It considers relevant planning policies at national, strategic and local level that are material to the determination of this application.
- The following sections deal with the issues raised by the application. **Sections Four** deals specifically with retail policy matters - addressing the 'sequential approach' and assessing the potential impact of the foodstore element of the application proposals having regard to the NPPF and the retail policies of the London Plan and the LB Havering LDF;

- **Section 5** considers the residential element of the proposals and the extent to which this complies with relevant policies in both the London Plan and LB Havering LDF;
- **Section Six** then considers other policies relevant to the proposal with reference, as appropriate, to the other assessments accompanying the application. These include:
 - The principle of development and the inter-relationship between this application and that being made concurrently by LB Havering for the development of a new replacement Leisure Centre on land at Mercury Gardens in Romford;
 - The accessibility of the proposed development at Rom Valley Way by a choice of means of transport and its impact on the local highway network;
 - The design of the proposed development and its effect on local townscape and the amenity of existing and possible future residents nearby;
 - The energy and sustainability issues associated with the proposed development; and
 - The impact of the proposed development on the local environment.
- **Section Seven** then sets out our conclusions.

2. SITE DESCRIPTION AND BACKGROUND TO THE APPLICATION

- 2.1 The application site is located at Rom Valley Way (A125) to the south west of Romford town centre. Rom Valley way forms the eastern boundary of the site and Queens Hospital abuts the southern and western boundaries. To the north is residential development fronting Oldchurch Road including Blade Court – see Location Plan in **Appendix 1**. The vacant site immediately to the north of the application site has already been the subject of planning applications for residential development – the most recent of which was made in August 2012 for 34 flats in two blocks (application reference P/1020/12); this had yet to be determined at the time of submission.
- 2.2 The application site comprises 2.9 hectares and is broadly rectangular in shape. It is currently occupied by the Romford Ice Rink and associated areas of car parking (variably of tarmac, concrete and permeable concrete / 'grasscrete'), and low grade landscaping. The site is predominantly flat and level, with a gentle downward slope of less than 1m from south west to north east.
- 2.3 The site lies over 650 metres from the main shopping area of Romford town centre. Although the Ice Rink site has been described as 'edge of centre' in certain Council documents in the past, for the purposes of this application the application site has been assessed as an 'out-of-centre' location - based on the definition contained in Annex 2 of the National Planning Policy Framework³.

Background to the Application

- 2.4 Morrisons have been seeking representation in Romford for a number of years. In November 2009, it acquired (through a nominee company) a site at Mercury Gardens on the edge of Romford town centre for a possible foodstore development.

³ i.e. "a location which is not in or on the edge of a centre but not necessarily outside the urban area." The LB Havering LDF Proposals Map does not designate a 'Primary Shopping Area' but, on the basis that the site lies more than 300 metres from the main shopping areas of Romford – and is separated from it by the Romford gyratory system - it cannot, in our view, be considered to be 'edge of centre' according to the NPPF definition; we have therefore approached the assessment of the proposal on the basis of an 'out-of-centre' site.

- 2.5 This 0.97ha site is currently occupied by two inter-connected office blocks together with associated surface level parking for 250 cars. The first block, Hexagon House, comprises 3,804 sq metres and is currently let to XChanging Ltd; the second, Chaucer House, comprises 1,982 sq metres is vacant.
- 2.6 It was Morrisons' intention to redevelop the whole Mercury Gardens site for a mixed use scheme comprising a large foodstore, with parking beneath, together with new offices, possibly with a hotel, residential and/or leisure use on floors above.
- 2.7 Just two months after completing the purchase of Mercury Gardens, and before any pre-application discussions were held with the Council, LB Havering approached Morrisons directly regarding the possible redevelopment of an alternative site at Rom Valley Way.
- 2.8 The Ice Rink site at Rom Valley Way had been the subject of redevelopment proposals in the past and had already been the subject of a tender process in 2007/8. At that time the Council's intention was to require the successful developer to fund a new leisure centre from the proceeds of a high density residential scheme developed alongside a new leisure centre.
- 2.9 In accordance with these ambitions the Rom Valley Way site was allocated for redevelopment for a mix of uses comprising residential, leisure and retail facilities under **Policy SSA7** in the Council's Site Specific Allocations DPD (see Section 3). Unfortunately the turmoil in the financial markets in late 2008 and subsequent downturn in the property market rendered these redevelopment proposals unviable. As a result the proposals were abandoned.
- 2.10 Despite having already made the acquisition of the site at Mercury Gardens, Morrisons conducted a thorough assessment of the trading potential of the Rom Valley Way site. It was concluded that it offered a more prominent location for a new foodstore on which it could potentially develop a larger store with improved parking and additional on-site customer facilities such a petrol filling station and car wash.

- 2.11 It was recognised that, in planning terms, the Rom Valley Way site is not as 'sequentially preferable' as Mercury Gardens. However, it was also recognised that its development could help facilitate the Council long-held aspirations to develop a new leisure centre in Romford on part of the Mercury Gardens site. The principle of a 'land swap' was duly agreed.
- 2.12 It was envisaged that two inter-related planning applications would be prepared and submitted simultaneously. The first – on the application site, would be submitted by Morrisons for a foodstore and residential development. The second – on part of the site at Mercury Gardens – would be made by the Council for a new facility to replace the Ice Rink that would be demolished by the proposals at Rom Valley Way and also provide a new leisure centre for the Borough. The principles of this approach were duly ratified by the Council in July 2011 and, in May 2012, Morrisons entered a conditional contract with the LB Havering based on a land swap transaction.
- 2.13 In parallel with the detailed negotiations on the land swap, both Morrisons' and the Council's development teams began working on detailed proposals for the two sites. In July 2012 a joint public exhibition of the proposals for the application site and for Mercury Gardens was held at Romford Central Library. The details of this and other pre-application consultations are contained in the Statement of Community Engagement prepared by Camargue and submitted with the application.
- 2.14 Following the exhibition, an application for a Screening Opinion under Regulation 5 of the Town & Country Planning (Environmental Impact Assessment) (England & Wales) Regulations was submitted by Chase & Partners (see **Appendix 2**). On 26th May the Council confirmed that, based on the information submitted, the proposals did not constitute a development that would require Environmental Impact Assessment. However, it was indicated that any application would need to be accompanied by series of additional assessments. For ease of reference the Council's response is included in **Appendix 3**.
- 2.15 Also in July a preliminary meeting with the GLA was held to present both the proposals for the Ice Rink site and for the new Leisure Centre at Mercury Gardens. Subsequently pre-application meetings were held with the GLA on 13th July and with TfL on 24th September.

2.16 These various pre-application meetings, together with the Council's response to the Screening Opinion request, have greatly assisted the applicant in preparing this and the other material submitted in support of the application.

The Application Proposal

2.17 The applicant is now proposing the development of a mixed use scheme comprising:

- a food superstore with a total gross area of 9,732 sq metres⁴ and net sales area⁵ of 3,760 sq metres;
- parking for 398 vehicles - including provision accessible space for disabled customers (26) and 'mother & child' facilities (12) as well as 10 dedicated spaces for the recharging of electrical vehicles;
- a six pump petrol filling station with kiosk (81 sq metres) and car wash (12 sq metres);
- Peripheral landscaping;
- new access arrangements off Rom Valley Way for both customers and service vehicles; and
- a scheme for up to 71 residential units on the 0.88ha site to the north of the proposed store. The illustrative scheme shows 25 three and four bed town houses and two blocks of one and two bed apartments. The first block, of five storeys fronts Rom Valley Way and includes 36 units; the second block, of three storeys, on the north west corner of the site, provides 10 units

An illustrative site layout plan is contained at **Appendix 4** for ease of reference.

⁴ This includes the ground floor area of the store, first floor store mezzanine and plant rooms, service yard and enclosed service ramp

⁵ Defined in accordance with the Competition Commission definition as set out in Appendix A of the Good Practice Guidance on Need Impact and the Sequential approach accompanying PPS4 – namely:
"the sales area within a building (i.e. all internal areas accessible to the customer), but excluding checkouts, lobbies, concessions, restaurants, customer toilets and walkways behind the checkouts."

2.18 The proposal will provide employment opportunities for local residents, both during the construction and operational phases. Morrisons expect the store to provide around 300 new job opportunities, in both full and part time positions, across a range of roles including managerial and core retail roles. These jobs will be readily accessible to the local community and be highly accessible by foot or bicycle. Morrisons offer a range of training programmes for employees across the workforce, and are committed to providing both initial and on-going training for all employees. The development will also generate additional construction jobs and bring new investment into the local economy.

2.19 At the same time as making this application the LB Havering is also submitting its own application for the a new new 'state of the art' public leisure facility comprising:

- A new public leisure and competitive 25m swimming pool with movable floor and approximately 250 spectator seats at ground floor level;
- A new teaching pool (17m by 8m);
- Poolside sauna and steam room;
- Fitness suite with 100 stations and an adjacent studio and two spa treatment rooms on a mezzanine level;
- Young person's gym of 30 stations;
- An ice rink (56m by 26m) with approximately 800 spectator seats on an upper level;
- Ancillary café and reception areas; and
- Essential support facilities, including changing rooms, staff and plant rooms, toilets and first aid facilities.

2.18 The land swap agreement with the Council is only activated if permission is granted for both schemes. Were either scheme to be refused consent, then the agreement is terminated. The assessment of the application scheme conducted in the following sections has regard to the proposal's relationship with the Council's application at Mercury Gardens and the benefits it affords.

3. PLANNING POLICY OVERVIEW

3.1 Planning applications must be determined in accordance with the development plan⁶ unless other material considerations indicate otherwise⁷. This section therefore sets out the 'development plan' framework against which the application proposals need to be assessed as well as other material considerations that are relevant in this instance.

3.2 It sets out the Strategic Policies contained in the London Plan relevant to the development of 'town centre uses' of the type proposed⁸, as well as relevant local policies contained in the London Borough of Havering Local Development Framework. It begins, however, with provisions of the National Planning Policy Framework (NPPF) which is also a material consideration in planning decisions⁹.

1. National Planning Policy Context

3.3 The National Planning Policy Framework (NPPF) was issued in March 2012 and came into force immediately. It led to the revocation of the previous advice on retailing and other economic development contained in PPS4: Planning for Sustainable Economic Growth issued in 2009.

3.4 The NPPF constitutes guidance to local planning authorities and decision-takers in both drawing up development plans and in determining applications. It is material consideration in planning decisions. It contains a strong presumption in favour of 'sustainable development.' This is described as "the golden thread" that runs through both plan making and decision taking. For decision taking this means

- Approving development proposals that accord with the development plan without delay; and
- Where the development plan is absent, silent, or relevant policies are out-of-date, granting planning permission unless
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of this Framework taken as a whole; or

⁶ Section 38(1) of the Planning & Compulsory Purchase Act

⁷ Section 38(6) of the Town & Country Planning Act 1990

⁸ Based on definition in paragraph 7 of PPS4 as retail development (including warehouse clubs and factory outlets centres), leisure, entertainment facilities, intensive sport and recreation, offices, arts, culture and tourism development.

⁹ See paragraph 2 of the NPPF

- Specific policies in this Framework indicate development should be restricted.

3.5 Paragraph 9 states:

"Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to):

- *making it easier for jobs to be created in cities, towns and villages;*
- *moving from a net loss of bio-diversity to achieving net gains for nature;*
- *replacing poor design with better design;*
- *improving the conditions in which people live, work, travel and take leisure; and*
- *widening the choice of high quality homes."*

3.6 Similarly, paragraph 19 of the NPPF states:

"The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system."

3.7 Guidance on the policy approach to applications for retail development is set out in paragraphs 24-27 of the NPPF - under the aegis of 'Ensuring the Vitality of Town Centres.' The relevant paragraphs state:

24. Local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town

centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale.

26. When assessing applications for retail, leisure and office development outside of town centres, which are not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500 sq m). This should include assessment of:

- the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and*
- the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made.*

27. Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the above factors, it should be refused.

3.8 PPS4 was supported by the Practice Guidance on Need, Impact and the Sequential Approach. Part 6 of Practice Guidance provided advice on sequential site assessments and provides definitions on “in centre”, “edge of centre” and “out of centre”. It also provides guidance on the methodology for assessing “availability”, “suitability” and “viability” of sites when undertaking such assessments. Similarly, Part 7 of the Practice Guidance addresses the question of impact and sets out the methodology for assessing the potential impacts of development.

3.9 There has been a degree of uncertainty regarding the weight that Local Planning Authorities should now afford to this Practice Guidance. Although it was not included in Annex 3 of the NPPF which set out the documents that were replaced by the NPPF, it clearly relates to the altogether more elaborate policy framework set out in PPS4 which, of course, was revoked by the NPPF. The weight that

should be afforded to this Guidance was considered recently by David Elvin QC in the light of the Judgement of the Supreme Court in the case of Tesco vs. Dundee City Council¹⁰; he states:

“One issue which may merit early consideration is the relevance of the Practice Guidance which accompanied the revoked documents, e.g. those for PPS4 and PPS5. Whilst DCLG suggest that they remain relevant, this is questionable given the revocation of the documents for which guidance was provided and their replacement with generally less complex and detailed policies. To apply that guidance might import in to the NPPF the baggage surrounding words now gone from policy and influence the meaning of the new policy, which ought to be interpreted as published.”

We have continued to have regard to the advice contained in the Good Practice Guidance in undertaking our assessment of the application site but have endeavoured to do so with due regard to the generally less complex and detailed policies now found in the NPPF compared with those in the PPS that it replaced.

3.10 In relation to transport, paragraph 32 requires all developments that generate a significant amount of traffic to be supported by a Transport Assessment. In making decisions local planning authorities should have regard to:

- whether opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- safe and suitable access to the site can be achieved for all people; and
- improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development.

It advised that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

3.11 Applications involving housing should be considered in the context of the presumption in favour of sustainable development.

¹⁰ Tesco Stores Limited (Appellant) v Dundee City Council (Respondent) (Scotland) [2012] UKSC 13

3.12 The NPPF continues to promote the importance of good design, although stresses that this should not lead to planning authorities imposing particular architectural styles or particular tastes and, in doing so, stifle innovation, originality or initiative. Indeed, the NPPF advises that:

"...great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area."

3.13 Decisions on applications should also address connections between people and places and integrate new development into the natural, built and, where relevant, historic environment.

3.14 In support of the Government's aims to reduce greenhouse gas emissions, minimise vulnerability and provide resilience to the impacts of climate change and support the delivery of more renewable and low carbon energy sources, the NPPF encourages planning authorities to support energy efficient development and avoid inappropriate development in areas at risk of flooding. When determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere.

3.15 Similarly, where a site is affected by contamination or land stability issues, the local planning authority must ensure that the site is suitable for the proposed use, taking account of ground conditions and land instability and any proposals for mitigation including land remediation or impacts on the natural environment arising from that remediation;

2. The London Plan

3.16 The Mayor's London Plan sets out an integrated economic, environmental, transport and social framework for the development of the capital over the next 20-25 years. Having adopted the First London Plan in 2004, a revised plan incorporating Alterations was adopted in 2008. Following the mayoral election in 2008 it was decided to create a Replacement Plan rather than amend the previous London Plan. Following consultation in late 2009/early 2010 and, following public examination between June and October 2010 and receipt of Panel's report in May 2011, the new London Plan was formally adopted in July 2011 and now provides the formal development plan for London for development control purposes.

- 3.17 The new London Plan is more focused than the previous Plan; it is, shorter and contains fewer policies, which are at a more strategic level. It continues to provide an overall spatial strategy for London, setting a framework for development to 2031. In contrast to the earlier Plan, it pays greater attention to the future development needs of outer London in order to ensure that its full potential is realized.
- 3.18 The Plan provides an integrated approach focusing on the economic, environmental, transport and social aspects of development in London. Amongst its themes that are relevant to the proposed development is the need to improve the environment and tackle climate change by reducing carbon dioxide emissions and heat loss from new developments; increasing renewable energy; managing flood risk and ensuring water supply and quality; improving sewerage systems; improving London's recycling performance and waste management; protecting its open spaces and making London a green and more pleasant place to live and visit and ensuring London's transport is easy, safe and convenient for everyone and encourage cycling, walking and electric vehicles.
- 3.19 The Plan also recognises that Outer London is a large and hugely diverse area that plays a vital role in the life and prosperity of the capital and its inhabitants. It is also where there is likely to be considerable population growth over the period to 2031. The work of the Outer London Commission demonstrated that if Outer London is to achieve its full potential, it is essential to that its development, transport and other infrastructure needs and the quality of life in outer London needs to be considered holistically. The Plan therefore seeks to move towards a more balanced and 'polycentric' pattern of development across London and help address pressures on the transport network into central London caused by the imbalance between where people live and where they work. The Plan advocates joined up approach to 'place shaping' – promoting mixed use development to enhance the quality of places, provision of social infrastructure and sustainability of neighbourhoods.
- 3.20 London's town centres are seen as a key spatial priority of the London Plan. Romford is designated as a Metropolitan Centre in the Plan's town centre hierarchy and, like other comparable centres, is seen as a key location for a diverse range of activities - including retail, leisure and office space as well as housing, social infrastructure and public open space. The London Plan also seeks to encourage

"a proactive partnership approach to identifying and bringing forward capacity for different types of town centre-related uses within or on the edges of centres whilst restraining inappropriate out of centre development" (see Policy 4.7 below).

This is seen as an essential component in helping to reinvigorate town centres, widening their roles and offers, developing their identities and encouraging more sustainable modes of travel.

- 3.21 Section 3 of the Plan sets out the Mayor's policies to for promoting the development of genuinely sustainable neighbourhoods *through, inter alia*, the provisions of supporting social infrastructure (including the provision of health, education and sports facilities) as well as policies to deliver more homes to meet a range of needs and are of high design quality.
- 3.22 The Mayor recognises that London desperately needs more homes in order to promote opportunity and offer real choice through a range of tenures that meet residents' diverse and changing needs and at prices they can afford. In pursuit of this aim, **Policy 3.4** seeks to optimise the housing potential of available sites, having regard to local context and character, design principles and public transport accessibility.
- 3.23 **Policy 3.5** then deals with the quality and design of new housing developments. These "should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open spaces, taking particular account of the needs of children and older people." Whilst LDF's should incorporate minimum space standards, new development should, wherever possible, reflect such standards – having adequately sized rooms and convenient and efficient room layouts. They should also meet the changing needs of Londoners over their lifetimes, address climate change adaptation and mitigation and social inclusion objectives and should be conceived and developed through an effective design process.
- 3.24 **Policy 3.6** sets out the policy for recreational space and facilities associated with new development; this should be based on the expected child population generated by the scheme and an assessment of future needs. Guidance is provided by the Mayor's Supplementary Planning Guidance issued in September

2012¹¹ that provides benchmark standards on play requirements in new developments and provides updated child yield figures for both boroughs and developers to assess child occupancy and play space requirements. The guidance sets a benchmark of 10 sq metres of useable child playspace to be provided per child, with under-5 child playspace provided on-site as a minimum.

- 3.25 **Policy 3.8** encourages a genuine choice of homes in terms of affordability, size and type. It requires all new housing to be built to 'Lifetime Homes' standards and for ten per cent of new housing to be designed to wheelchair accessible, or easily adaptable for residents who are wheelchair users.
- 3.26 The Mayor published his draft Housing Supplementary Planning Guidance (SPG) for consultation in December 2011. It sets out proposed guidance to supplement the housing policies in the Plan and provides more detail on the quality and design of homes in London.
- 3.27 **Policy 3.12** requires Borough Councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed use schemes. In doing so, regard should be had to current and future requirements for affordable housing at regional and local levels, Borough-level affordable housing targets adopted in line with **Policy 3.11**, the need to encourage rather than restrain residential development, the need to promote mixed and balanced communities and the size and type of affordable housing needed in particular locations. The Plan recognises that regard also needs to be given to the individual circumstances of specific sites - including development viability, the availability of public subsidy, the implications of phased development and other scheme requirements.
- 3.28 **Policy 3.11** states that 60% of affordable housing provision should be for social rent and 40% for intermediate rent or sale and that priority should be accorded to the provision of affordable family housing.
- 3.29 Finally, it should be noted that whilst **Policy 3.19** resists the net loss of sports and recreation facilities. However, it also supports development proposals that increase or enhance the provision of sports and recreation facilities.

¹¹ 'Shaping Neighbourhoods; Play and Informal Recreation' SPG GLA Sept 2012

- 3.30 Section 4 sets out the Mayor's policies for Retail and Town Centre Development. Policy 4.7 states:

In taking planning decisions on proposed retail and town centre development, the following principles should be applied:

- a the scale of retail, commercial, culture and leisure development should be related to the size, role and function of a town centre and its catchment*
- b retail, commercial, culture and leisure development should be focused on sites within town centres, or if no in-centre sites are available, on sites on the edges of centres that are, or can be, well integrated with the existing centre and public transport*
- c proposals for new, or extensions to existing, edge or out of centre development will be subject to an assessment of impact.*

- 3.31 The Plan supports a proactive approach to accommodating new retail development and managing growth within and on the edges of existing town centres as these are seen as the most appropriate locations consistent with the Plan's overall locational strategy. It also explicitly encourages joint work between public and private sectors to identify and bring forward new retail, leisure and commercial development opportunities.

- 3.32 Climate change policies as set out in Chapter 5 of the Plan. They collectively require developments to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures, prioritising decentralised energy supply, and incorporating renewable energy. The policies set out ways in which developers must address mitigation of, and adaptation to, the effects of climate change.

- 3.33 **Policy 5.1** and **5.2** seek to achieve an overall reduction in London's carbon dioxide emissions through a range of measures including using less energy, supplying energy efficiently and using renewable energy, improving on Building Regulations targets by 25% in the period 2010-2013.

- 3.34 Development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the Mayor's 'energy hierarchy' – namely by being lean (using less energy); being clean (supply energy efficiently); and being green (using renewable energy).

- 3.35 As a minimum, all non-domestic development proposals should meet the Mayor's targets for carbon dioxide emissions reduction in buildings – expressed as minimum improvements over the Target Emission Rate (TER) outlined in the national Building Regulations leading to zero carbon residential buildings from 2016 and zero carbon non-domestic buildings from 2019. In order to assess performance against these targets, major development proposals should include a detailed energy assessment to demonstrate how these minimum targets are to be within the framework contained in the energy hierarchy.
- 3.36 The first step in the hierarchy, to reduce energy demand, should be met through adopting the sustainable design principles outlined in **Policy 5.3**. This requires major development proposals to meet the minimum standards outlined in the Mayor's supplementary planning guidance on Sustainable Design and Construction. These should be clearly addressed in the Design and Access Statement accompanying any application and include measures to minimising carbon dioxide emissions, avoiding internal overheating and contributing to the urban heat island effect, make efficient use of natural resources, avoid pollution (including noise, air and urban runoff), minimise waste and maximise reuse or recycling, avoid impacts from natural hazards such as flooding, ensure developments are comfortable and secure for users, secure sustainable procurement of materials (using local supplies where feasible) and promote and protect biodiversity and green infrastructure.
- 3.37 The second step, to supply energy efficiently, should be met by prioritising decentralised energy, as outlined in **Policies 5.5** and **5.6**.
- 3.38 The third step, to use renewable energy, is outlined in **Policy 5.7** that requires major development proposals to provide a reduction in carbon dioxide emissions through the use of onsite renewable energy generation, where feasible.
- 3.39 **Policies 5.9 to 5.19** set out the Mayor's policies in respect of climate change adaptation and decentralised energy systems, including low carbon and renewable energy; these are not reproduced in full here but include:
- Overheating and Cooling (**Policy 5.9**);
 - Green Roofs (and walls) and Development Site Environs (**Policy 5.11**);
 - Flood risk management (**Policy 5.12**);

- Sustainable Drainage (**Policy 5.13**);
- Water Quality and Wastewater Infrastructure (**Policy 5.14**);
- Water Use and Supplies (**Policy 5.15**);
- Construction, excavation and demolition waste (**Policy 5.18**); and
- Contaminated Land (**Policy 5.21**)

3.40 Section 6 of the Plan then deals with Transport. As part of the overall strategy set out in **Policy 6.1**, specific policies seek to ensure:

- That the impacts of proposed developments are properly assessed and applications include workplace travel plans in accordance with relevant guidance, together with construction logistics plans and delivery and servicing plans (**Policy 6.3**);
- adequate facilities for: cyclists at new developments (**Policy 6.9**);
- the safety and quality of pedestrian environments at new development (**Policy 6.10**);
- adequate parking is provided – including the provision of electrical charging facilities, adequate disabled parking as well as delivery and servicing (**Policy 6.13**).

3.41 Section 7 deals with 'London's Living Places and Spaces' and sets out the Mayor's policies on design and the context within which targets set out in other chapters of the Plan should be met. The Mayor's over-arching policy on 'place shaping' is set out in **Policy 7.1**. This seeks to ensure that new development is designed so that the layout mix of uses and relationship with surrounding land will improve people's access to community infrastructure (including green spaces), commercial services and public transport and "maximize the opportunity for community diversity, inclusion and cohesion and should contribute to people's sense of place, safety and security."

3.42 **Policy 7.2** also maintains the requirement that proposals achieve the highest standards of accessibility and inclusion and demonstrate that they meet the principles of inclusive design. Design and Access statements submitted in support of applications should explain how the principles of inclusive design, including the

specific needs of older and disabled people, have been integrated into the proposed development, and how inclusion will be maintained and managed.

- 3.43 Similarly **Policy 7.3** requires that development be consistent with the principles of relevant guidance¹² in reducing the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating. The policy seeks to ensure that both places and buildings incorporate well-designed security features and be resilient to vandalism and be designed with regard to future maintenance. **Policy 7.13** also requires that proposals should contribute to the minimisation of potential physical risks, including those arising as a result of fire, flood and related hazards and include measures that, in proportion to the risk, deter terrorism, assist in the detection of terrorist activity and help defer its effects.
- 3.44 **Policy 7.6** recognises the role of architectural design and requires that new development is of the highest architectural quality and be of a proportion, composition, scale and orientation that enhances, activates and appropriately encloses the public realm. New development should not cause unacceptable harm to the amenity of surrounding areas. In accordance with other policies in the Draft Replacement Plan, new development should incorporate best practice in resource management and climate change mitigation and adaptation; it should also meet the principles of inclusive design.
- 3.45 **Policy 7.14** of the London Plan seeks to promote sustainable design and construction to reduce emissions from the demolition and construction in line with the GLA and London Councils' best practice guidance¹³. Development should be 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)).
- 3.46 The policy is supplemented by the Mayor's Air Quality Strategy – first published in 2002 and updated in 2010 – which aims to reduce air pollution in London in order to improve public health. The latest strategy¹⁴ outlines a framework for delivering improvements to air quality and measures to reduce emissions from transport, existing and proposed development and raise awareness of air quality issues. It

¹² including 'Secured by Design' Association of Chief Police Officers Project and Design Group 1994
'Designing Out Crime' ODPM / Home Office 1990
'Safer Places; The Planning System and Crime Prevention' ODPM 2003

¹³ 'The control of dust and emissions from construction and demolition' GLA & London Councils

¹⁴ 'Clearing the Air: The Mayor's Air Quality Strategy 2010'

complements the Mayor's Supplementary Planning Document on Sustainable Construction and Design - that seeks to promote low-emission development - as well as the Mayor's Best Practice Guidance on controlling dust and emissions from Construction sites.

- 3.47 Similarly **Policy 7.15** seek to reduce noise by minimising the existing and potential adverse impacts of noise from, within, or in the vicinity of, development proposals and promoting new technologies and improved practices to reduce noise at source.
- 3.48 **Policies 69** and **70** of the Mayor's Noise Strategy requires a noise assessment to be undertaken where noise levels are above Noise Exposure Category (NEC) A. In keeping with the Mayor's SPD on Sustainable Construction and Design - this requires that new development be designed in a way that ensures adverse impacts are minimised.
- 3.49 With the context provided by in the Mayor's Biodiversity Strategy **Plan 7.19** requires development proposals to, wherever possible, make a positive contribution to the protection, promotion and management of biodiversity and, be resisted, where they are likely to have significant adverse impact on European or nationally designated sites or on the population or conservation status of a protected species or a priority species identified in a UK, London or Borough Biodiversity Action Plan.

3. Local Planning Policy

- 3.50 The LB Havering's Local Development Framework (LDF) comprises a portfolio of planning documents which have and provides the local planning policy framework against which the application proposals need to be assessed.

(a) Core Strategy and Development Control DPD

- 3.51 The Core Strategy and Development Control DPD was adopted in 2008 and sets out the Council's overall approach to the planning across the Borough up to 2030.

3.52 The following policies in the Core Strategy are of particular relevance to the application proposals.

- **Policy CP4 – Town Centres** seeks to promote and enhance Romford and the Borough’s other designated centre by directing retail, cultural and service development to them according to the principles of the ‘sequential approach.’ In doing so, the scale of any such development should be consistent with the role and function of that centre and not harm its vitality and viability.
- **Policy CP9 – Reducing the Need to Travel** encourages the co-locating of major trip-generating activity in places with good accessibility by public transport; ensuring new development reinforces the Borough’s town centre hierarchy; and, in the case of residential development, ensuring the density is consistent with public transport accessibility levels and character of existing development.
- **CP15- Environmental Management.** In keeping with the provisions of the London Plan, this policy seeks to reduce the environmental impact of new development and address the causes and mitigate the effect of climate change by minimising use of natural resources; reducing flood risk; have sustainable water supply and drainage systems; avoid adverse impact on both water and air quality; mitigate issues associated with contaminated land; avoid noise sensitive uses being affected by excessive noise and minimising the negative effect of lighting. In order to achieve this major new development is expected to adopt high standards of sustainable construction and design and incorporate on-site renewable energy facilities to reduce harmful emissions.
- **CP17-Design.** Again, in line with London Plan policy, this seeks to maintain and, where possible, enhance the appearance, safety and accessibility of development in the Borough, through high standard, safe and inclusive design.

3.53 Additionally, the application also needs to have regard to the array of development control policies in the Core Strategy and Development Control policies DPD (many of which re-iterate requirements of the London Plan). The following are considered relevant to a mixed use development of this type.

3.54 The residential element of the scheme also needs to have regard an array of development control policies including the following:

- **Policy DC2** on housing mix – which in this case would require 165-275 units / ha with between 0-1.25 car parking spaces per unit – based on provisions of **Policy DC33**;
- **Policy DC3** on housing layout and design;
- **Policy DC6** – affordable housing – which would potentially require 50% of all housing to be affordable; and
- **Policy DC7** on Lifetime Homes and Mobility.

3.49 Similarly, the inclusion of residential accommodation would also require contributions towards education (under **Policies DC29**) and community facilities (under **Policy DC30**) – although in this instance regard will need to be had to provision of new leisure facilities that is being made at Mercury Gardens that is linked to this development through the proposed S106 agreement.

3.55 Finally a major mixed use scheme would also be required to satisfy **Policy DC40** on waste management and – under **Policy DC48** - require a Flood Risk Assessment in accordance with the Borough’s Strategic Flood Risk Assessment.

3.56 It would also be required to comply with a wide array of Environmental Management and Design policies which reflect similar strategic policies in the London Plan and Mayor’s Climate Change mitigation strategy. These *inter alia* include policies on Sustainable Design and Construction (**Policy DC49**), provision of Renewable Energy (**Policy DC50**), Air Quality (**Policy DC52**), Noise (**Policy DC56**), Bio-Diversity (**Policy DC59**) and Urban Design (**Policy DC61**).

(b) Site Specific Allocations DPD

3.57 As outlined in Section 2, the application site is allocated for redevelopment under **Policy SSA7** in the Site Specific Allocations DPD. The policy envisages redevelopment for a mix of uses comprising residential, leisure and retail facilities, reflecting previous redevelopment proposals.

3.58 Residential densities should be in the range outlined in Policy DC2 (see above) and any development should consistent in scale and massing with the both Queens Hospital and the adjoining residential development at Blade Court.

(c) Design for Living: Residential Design SPD

3.59 The Council's Residential Design SPD was adopted in 2010 and provides further detail on the implementation of **Core Policy 17** (Design) and related development Control Policies – notably **Policy DC2** regarding housing mix and density and **Policy DC3** on housing design and layout.

(d) Draft Planning Obligations SPD

3.60 In line with **Policy DC72** of the Core Strategy and Development Control DPD, the Council, in March 2012, issued its Planning Obligations SPD for consultation. This outlines the Council's approach to planning obligations and how these will seek to secure contributions towards new infrastructure and/or additional or improved community services and facilities in order to ensure new development does not have an adverse effect upon service provision, amenity or the environment.

3.61 It proposes a 'standard charge' of £6,000 per dwelling to apply to all new residential development to ensure that it contributes "appropriately, both financially and in-kind, towards the provision of required infrastructure and services." As the standard charge does not cover every likely impact that may need to be addressed through a planning obligation, the SPD also provides further guidance on the consideration of other obligations that may be sought depending on site-specific circumstances.

Policy Overview

3.62 This Section has set out the elaborate policy framework that the proposed development needs to be assessed against.

3.63 Regard clearly needs to be had to Section 38(6) of the 2004 Act and the requirements of the statutory development plan – in this case the London Plan 2011 and the adopted policies of the LB Havering Local Development Framework - and requires the application to be determined in accordance with those policies unless material considerations indicate otherwise. Any decision also has to give due weight and consideration to the NPPF and the presumption in favour of sustainable development it contains.

- 3.64 As well as demonstrating compliance with prevailing policies for both retail and residential development in Havering, the applicant also needs to demonstrate that the proposed development is acceptable in all other relevant respects – including satisfying strategic and local policies regarding environmental protection and amenity, sustainable design and construction, and climate change mitigation/adaption.
- 3.65 The following sections of this report assess the proposed development against the policy framework outlined above. **Section 4** considers the retail element of the development whilst **Section 5** considers the residential element of the proposals and the extent to which they comply with the provisions of the NPPF as well as the relevant policies in both the London Plan and LB Havering LDF. **Section 6** then considers the relationship between the application scheme and the other relevant policies outlined above. With reference to the other supporting statements, it seeks to demonstrate how it complies with the requirements of these various policies.

4. RETAIL DEVELOPMENT ISSUES

4.1 The Section deals with the retail aspects of the development. It specifically considers the extent to which the proposals comply with the 'sequential approach' and whether the proposed development would lead to significant adverse impact on Romford and other designated centres nearby sufficient to justify refusal.

1. Sequential Approach

4.2 As Section 3 has outlined, paragraph 24 of the NPPF requires local planning authorities to apply a sequential test to applications for 'main town centre uses' that are not within a designated centre and are not in accordance with an up-to-date development plan. Whilst conceived under the provisions of PPS4, **Policy 4.7** of the London Plan and **Policy CP4** of the LB Havering Core Strategy essentially echoes the provisions of the NPPF in relation to the sequential approach.

4.3 In seeking to demonstrate compliance, the NPPF continues to require applicants to demonstrate flexibility in terms of format and scale. However, in contrast to PPS4, the NPPF no longer explicitly requires applicants to consider how a specific proposal might be disaggregated in order to allow its accommodation on a 'sequentially preferable' site.

4.4 Similarly the NPPF no longer places an explicit requirement on applicants to assess the potential viability of 'sequentially preferable' sites. However, as discussed in Section 3, it could be argued that the fact that local planning authorities are still required to assess whether sites are suitable and viable at the plan making stage implies there remains an obligation on applicants to do the same when assessing 'sequentially preferable' sites at the application stage.

4.5 It is not being argued that the Ice Rink site is 'edge of centre' (at least according to the definition contained in Annex A of the NPPF). However, it should be noted that the Council has itself, previously acknowledged the site to be well-related to Romford town centre. It is therefore relevant in undertaking the 'sequential test' in this particular instance to recognise the degree of preference the NPPF gives to 'out-of-centre' sites that are well connected to an existing town centre over locations elsewhere – providing, of course, that any other sequential sites have been considered and discounted.

- 4.6 In the same regard, the London Plan explicitly encourages "a proactive partnership approach" to identifying, and then bringing forward, town centre-related uses within, or on the edges of, existing centres as a means to not only reinvigorate town centres but also widening their roles and offers, develop their identities and encourage more sustainable modes of travel. This application – when combined with the Council's own scheme to replace the existing Ice Rink on the site at Mercury Gardens – seeks to fulfil this objective in this case.
- 4.7 The proposals at Rom Valley Way would enhance the existing retail offer of Romford and provide enhanced consumer choice to local residents but also help facilitate the Council's long-standing ambition to replace the existing Ice Rink and provide much-enhanced leisure and recreation facilities in the Borough. By doing so at Mercury Gardens, the proposals would also enhance the attractiveness of these facilities by non-car modes, encourage the use of more sustainable modes of transport, widen the role and attractiveness of Romford town centre as both a leisure and retail destination, and deliver wider social and community benefits. This provides an important – if not unique – context for the sequential assessment that is required in this particular instance.
- 4.8 It is acknowledged that the site at Mercury Gardens – by virtue of the fact that it is owned by the applicant and was originally acquired for a foodstore – needs to be assessed as a 'sequentially preferable' alternative that might, in itself, be considered to be both available and suitable to accommodate the proposed development at Rom Valley Way. However, in conducting such an assessment one cannot disregard the inter-relationship between the application site and the proposals for the replacement Ice Rink facility on the land at Mercury Gardens.
- 4.9 Similarly the inter-relationship between the application site and Mercury Gardens (and the benefits the development of both sites might collectively deliver) also has a bearing on the assessment of other 'sequentially preferable' alternatives that might exist (as we will discuss below).
- 4.10 It has been agreed during the course of pre-application meetings with officers at LB Havering that the following sites should be considered as part of the sequential site assessment:

(i) Mercury Gardens

- 4.11 As Section 2 has outlined, the site at Mercury Gardens is currently owned by the applicant and clearly has the potential to accommodate a foodstore comparable to that proposed at Rom Valley Way. By virtue of the site's proximity to the main shopping area of Romford town centre, the site can also be considered to be a 'sequential preferable' location to the application site.
- 4.12 It is not therefore disputed that, in isolation, it could be considered to be available as well as potentially suitable and, one must assume, viable for a development comparable to that proposed on the application site. Otherwise, why would the applicant have acquired it?
- 4.13 However, as Section 2 has also explained, a substantial part of the Mercury Gardens site is now the subject of a separate planning application by the Council for a new leisure centre. This is directly related to the Morrisons' application and will replace the Ice Rink that would be demolished should consent be granted at Rom Valley Way. In this regard the two applications are inextricably linked and, as such, the whole of the existing Mercury Gardens site cannot be considered – at least for the purposes of the sequential assessment - to be 'available' for a foodstore development comparable to that proposed in this application at Rom Valley Way.
- 4.14 The Council's proposals only occupy 0.4 ha of the total site area of approximately 1 ha site owned by Perimeter Holdings. The proposed redevelopment would therefore still leave around 0.6ha of the Mercury Gardens site intact and this might still therefore be considered a 'sequentially preferable' alternative to the application site at Rom Valley Way. The most viable use of the remainder of the site remains offices (subject to obtaining permission for the alterations that will be required if the Council's application for the leisure centre scheme is approved). The residual site would be unable to accommodate a major retail unit comparable to that proposed at Rom Valley Way (even allowing for a reasonable degree of flexibility) and cannot therefore be considered suitable as an alternative site for the proposed development.

4.15 More fundamentally, however, given both the inter-relationship of the two planning applications at Rom Valley Way and at Mercury Gardens, and the fact that neither can be delivered without the other means the relevance of even considering the suitability (or potential viability) of the residual land at Mercury Gardens for a foodstore is essentially academic.

(ii) Angel Way

4.16 This 0.8ha site is bounded by the Ring Road (which forms the northern and western boundaries of the site), by Trinity Methodist Church, Trinity Hall to the South and Angel Way to the East. It is allocated as **ROMSSA1** – Angel Way in the Romford Area Action Plan DPD.

4.17 Planning permission was granted at appeal in December 2009 for a high density mixed-use development of 350 residential units, a 63-bedroom hotel, ground-floor mixed retail, basement car parking and a new public square¹⁵. This consent remains extant although has not been implemented.

4.18 Redevelopment of the Angel Way site in accordance with either the extant consent or the site allocation would predominantly be for high density residential use. This, combined with the fact that the site would be unable to accommodate a major retail unit comparable to that proposed at Rom Valley Way in isolation, let alone additional residential accommodation, means it cannot be considered suitable as an alternative site for the proposed development.

(iii) Como Street Car Park

4.19 This site of approximately 0.6ha is located to the north-west of the junction of North Street with St Edward's Way. The western boundary of the site is formed by the River Rom. To the north, the site is adjoined by commercial premises fronting onto Como Street and North Street.

4.20 The site is owned by LB Havering and officers have been investigating the opportunity for new mixed use development on the site for some time; it was (unsuccessfully) marketed for redevelopment in March 2007.

¹⁵ See appeal reference APP/B5480/A/09/2108065

- 4.21 Like the site at Angel Way, the Como Street site has also been identified as a specific site allocation in the Romford Area Action Plan DPD (**ROMSSA3 – Como Street**). Also like Angel Way, the site is heavily constrained by surrounding uses and the Council's aspiration to open up the Rom River in the town centre; as a result the preferred use is for high density residential accommodation. Although smaller scale retail uses were also considered acceptable, the site would be unable to accommodate a development comparable in any form to that proposed at Rom Valley Way. As a result we would conclude that the site cannot be considered suitable.
- 4.22 In conclusion therefore, any 'sequential assessment' for the application site must have regard to the fundamental inter-relationship between it and the complementary proposals for the replacement Ice Rink facility as part of the proposed Leisure Centre on the land at Mercury Gardens. Although it is not disputed that the latter is 'sequentially preferable' it cannot be considered available – by virtue of the fact that there is now a planning application on a large part of it for development – the delivery of which is dependent on the approval of the application scheme. The remainder of the Mercury Gardens site that would remain available, should the leisure centre proposal be approved and developed by LB Havering, would be unable to accommodate a proposal comparable to that proposed on the application site and must therefore be considered unsuitable. On this basis the issue of the viability of residual element of the Mercury Gardens site for a foodstore site does not arise.
- 4.23 The other sites identified cannot be considered available, and certainly not suitable, to accommodate the proposed development. Moreover, none are capable of delivering – in combination with the Council proposals at Mercury Gardens – the wider community benefits that the application scheme facilitates.
- 4.24 On this basis, the requirements of paragraph 24 of the NPPF are satisfied, as are the requirements of the London Plan and **Policy CP4** of the LB Havering Core Strategy.

2. Impact

4.25 In relation to impact, the NPPF outlines the criteria against which applications for economic development will need to be assessed. Whilst the provisions of both the London Plan and the LB Havering LDF are in keeping with the approach now embodied in the NPPF, as more recent advice, the NPPF supersedes these policies and provides the basis on which the acceptability of the application proposal should be assessed.

4.26 Paragraph 26 of the NPPF requires applicants to demonstrate that the proposal will not have significant adverse effect on:

- existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
- town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made.

4.27 There is no longer an explicit requirement for applicants to undertake an assessment of the proposal's impact on the turnover of nearby centres, nor consider the cumulative effect of proposals on trade/turnover of these centres. However, it is acknowledged that some form of quantitative assessment of the affect of the proposed development on existing trading patterns needs to be undertaken as part of any assessment of likely impact on town centre vitality and viability. Similarly the NPPF also makes no mention of assessing impact on allocated sites in 'out-of-centre' locations, or locally important impacts, nor the appropriateness of the scale of the proposal.

4.28 We therefore now consider the potential impact of the proposals on those matters specifically identified as relevant in the NPPF – namely the following:

(a) Impact existing, committed and planned public and private investment

4.29 In assessing any impact a proposed development might have, the Practice Guidance accompanying PPS4 advises that consideration should be given to matters such as the stage the investment has reached; the degree of developer/occupier commitment; the level and significance of predicted direct and

indirect impacts; the potential effect upon current and forecast turnovers and operator demand and investor confidence in the proposals.

- 4.30 Discussions with officers at LB Havering have confirmed that there are currently no major existing or committed investment proposals in Romford town centre that could be considered vulnerable to the proposed development. On the contrary, the way in which the application, were it to be approved, would facilitate the development of the new leisure centre at Mercury Gardens would represent a major positive impact on public sector investment in the town centre. On this basis, rather than having a negative effect on planned investment the applications would indirectly promote public sector investment in the town centre.

(b) Impact on town centre vitality and viability including consumer choice and trade

- 4.31 As Section 2 outlined Chase & Partners has undertaken its own up-to-date health check of Romford town centre as well as the designated Major District Centre at Hornchurch and the designated Minor District Centre at Elm Park; these are set out in **Appendix 5**. The surveys conclude that, despite the prevailing economic situation, both Romford and these nearby centres remains both vital and viable.
- 4.32 Clearly the application proposals will introduce new competition into Romford and, in doing so, complies with the government ambitions set out in the NPPF to encourage economic growth.
- 4.33 In accordance with prevailing advice Chase & Partners has undertaken a detailed quantitative assessment of the likely impact the proposed supermarket may have on Romford and nearby centres. This has been prepared in the format of a traditional retail capacity and impact assessment. Wherever possible, we have endeavoured to use, as far as possible, the same key inputs that were used by the Council's consultants, GVA Grimley in preparing the Retail and Commercial Leisure Needs Assessment.
- 4.34 A commentary explaining the methodology used and assumptions used in our assessment is set out in **Appendix 6**; the Study area used for the Assessment is set out in **Appendix 7** and the detailed tables in **Appendix 8**.

- 4.35 This assessment demonstrates that whilst the proposed development will have an impact on existing convenience turnover of stores in Romford town centre – particularly the existing Asda store at Dolphin Way and the Sainsbury’s at The Brewery - this is not of an order to affect their continued viability. Moreover, any commercial impact on individual operators arising as a result of the proposals needs to be weighed against the enhanced competition and choice afforded by a new Morrisons store at Rom Valley Way.
- 4.36 Perhaps more importantly, the impact of the proposed store on wider town centre trade would certainly not be of an order to lead to the sort of ‘significant adverse effect’ on its vitality and viability that would be sufficient to justify refusal under prevailing policy.
- 4.37 The effect of the store on other centres nearby – notably Hornchurch and Elm Park - is limited and, again, not of an order to lead to any cause for concern.
- 4.38 Overall, any retail impact arising as a result of the development is unlikely to be of an order to lead to ‘significant adverse effect’ on either Romford or other nearby centres nearby sufficient to justify refusal under paragraphs 26 and 27 of the NPPF.

5. RESIDENTIAL DEVELOPMENT ISSUES

- 5.1 The application also seeks outline planning permission for a residential scheme. Approval is only sought for the proposed means access, with all other details to be dealt with as Reserved Matters.
- 5.2 Were consent to be granted, it is intended that the residential part of the Rom Valley Way site would be sold in due course to a residential developer who would be required to submit Reserved Matters pursuant to the outline consent. In doing so, the developer would be required to demonstrate how a detailed scheme would comply with the Council's detailed policies for residential development contained in the Core Strategy and Development Control DPD.
- 5.3 Although submitted in outline, detailed consideration has, nonetheless, been given to the residential element of the proposed scheme. This has been done to:
- (a) demonstrate the potential capacity of the residential element of the site - having regard to both the housing and design policies contained in the London Plan and the LB Havering LDF as well as associated supplementary planning guidance; it also seeks to respond to detailed design issues raised by both the Council and the GLA in pre-application discussions; and
 - (b) inform the other assessments accompanying the application - for example, the Transport Air Quality and Acoustic Assessments, etc.
- 5.4 Section 4.9 of the **Design and Access Statement** sets out a series of residential design options that have been considered for this part of the site. These have had regard to the relationship of the residential site to the proposed foodstore (and in particular the proposed service area and associated ramp) as well as the existing residential accommodation at Blade Court and the proposed development on land to the north.
- 5.5 Pre-application discussions with the Council also revealed concerns regarding potential oversupply of flats in and around Romford town centre in the wake of the relatively large number of apartment buildings that have either been built or granted consent in recent years.

- 5.6 The proposed scheme is solely for private market sale. It is recognised that this would potentially conflict with **Policy 3.12** of the London Plan. The reasons for omitting affordable housing in the proposals is addressed in the confidential viability assessment the applicant is submitting to the Council which explains the financials limitations brought about by the relationship between the application proposals and the land swap at Mercury Gardens to facilitate the new replacement ice rink and new leisure centre.
- 5.7 Additionally, the report also explains that market advice shows that there is currently greater demand for family housing with directly associated amenity space rather than flatted development. In response to this the preferred scheme proposes
- a mix of up to 25, 3 or 4 bed-roomed town houses; and
 - one five storey block fronting Rom Valley Way of 36, 1 and 2 bed flats and
 - another block, of three storeys, of 10, 1 and 2 bed flats on the western corner of the site.
- 5.8 The illustrative scheme¹⁶ would have a residential density of 81 u/ha (units per hectare) and would produce a total of 238 habitable rooms (hr) - generating a density of 270 hr/ha (habitable rooms per hectare). On the basis of a Public Transport Accessibility Level (PTAL) level of 5-6a for this part of the site, this would mean the site would be at the lower density range of 200-700 hr/ha or 55-225 u/ha (for an average of 3.3 hr/u) set out in Table 3.2 of the London Plan. This is due to the required focus on larger family dwellings rather than more dense apartment block development.
- 5.9 The scheme will, of course, require amenity space for the family housing. Pre-application discussions indicate that the arrangement of streets and private amenity space could have benefits in this case over shared amenity space – particularly given the contained nature of the development and availability of public open space in the adjacent linear park around the hospital complex. The illustrative scheme demonstrates how this type of private amenity space could be provided in this case to meet required standards.

¹⁶ Assuming 15 x 1 bed apartments @ 2 hr/u; 31 x 2 bed apartments @ 3 hr/u; 10 x 3 bed houses @ 4 hr/u; and 15 x 4 bed houses @ 5 hr/u

- 5.10 The illustrative layout seeks to demonstrate how the residential element of the site might be integrated into the existing area. It pays particular attention to enhancing pedestrian connectivity between Rom Valley Way and Oldchurch Rise and beyond to the hospital and associated bus station – providing, if possible, an open residential street ensuring quality and safety along this route.
- 5.11 Section 6 of the Design and Access **Design & Access Statement** endeavour to summarise the thinking behind the illustrative scheme and sets out – in Section 6.3 - the key parameters that might help define the future planning of this part of the site.

6. OTHER POLICY CONSIDERATIONS

6.1 This section considers the development proposals in the context of other relevant planning policies.

Principle of Development

6.2 Section 2 of this report provides the background to the application proposals and its relationship to the complementary application being made by LB Havering for a replacement Leisure Centre on the land at Mercury Gardens. It also explains the background to the existing site allocation of the Rom Valley Way site in the LDF.

6.3 It is acknowledged that the proposed development does not accord with specific site allocation in **Policy SSA7**. This policy clearly envisages comprehensive redevelopment of the Ice Rink site and the re-provision of the existing facility – albeit as part of a high density mixed use development on the Rom Valley Way site.

6.4 It was never conclusively demonstrated that the original scheme for the redevelopment of the Ice Rink was viable – even at the height of the property market. The proposed scheme, and the associated land swap at Mercury Gardens, therefore reflects the fundamental change in market conditions since the site was allocated.

6.5 It also continues to facilitate the delivery of a replacement ice Rink and new leisure centre in what can be considered to be a 'sequentially preferable' location and one that potentially offers greater enhancement to the attractiveness of Romford as a leisure destination than the original proposal at Rom Valley Way. Any potential conflict the application scheme represents with the adopted policy for the site needs to be seen in this context.

Accessibility and Highways

6.6 In accordance with the requirements of paragraph 32 of the NPPF, the policies in Chapter 6 of the London Plan and **Policy CP9** of the LB Havering Core Strategy, the Transport Assessment provides a detailed analysis of proposed vehicular movements and a strategy for accommodating them.

- 6.7 Detailed access and highway issues are dealt with in the comprehensive Transport Assessment (TA) prepared by Mayer Brown. This examines prevailing traffic conditions, the potential traffic attraction of the proposed development, and the effect this traffic might have on the operation of the local highway network. The report also assesses the sustainability of the site and the site's accessibility by non car modes of transport.
- 6.8 The detailed analysis is not revisited in this report; its conclusions may be summarised as follows:
- the Rom Valley Way site is currently highly accessible by non-car modes of transport with a PTAL rating of 5;
 - the application proposals will improve the accessibility of the site to public transport;
 - the proposals provide appropriate parking to support the development;
 - the local highway network can accommodate the development's predicted traffic flows;
 - the proposed roundabout junction on Rom Valley Way will significantly benefit the operation of the local highway network.
- 6.9 The TA concludes that the development proposals will conform with key national, strategic and local policies on sustainable transport, will have no adverse impact on the operation of the local highway network and there is no basis to resist the application proposals on highways or transportation grounds.
- 6.10 Similarly, and in accordance with the requirements of the NPPF, the London Plan and Core Strategy **Policies CP9**, the TA presents a comprehensive Travel Plan for the proposed development

Design

- 6.11 As the **Design and Access Statement** explains in detail, the proposals at Rom Valley Way have been the subject of careful consideration - having regard to the policy framework set out in national guidance and in the London plan and LB Havering LDF and associated guidance.

Noise

- 6.12 London **Policy 7.15** of the London Plan and **Policies CP15 and DC56** of the LB Havering Core Strategy and Development Control DPD deal with noise and the need to minimise existing and potential adverse impacts on, from, within or in the vicinity of development proposals.
- 6.13 The Acoustic Impact Assessment prepared by Belair Research Ltd. undertakes a baseline assessment of existing noise conditions and assesses the likely noise effects of the proposed development. It considers the noise produced by the equipment and activities associated with the proposed development together with the overall effect of the development on prevailing environment.
- 6.14 The Acoustic Impact Assessment concludes that:
- The separation distance and acoustic screening proposed for both the enclosed service yard and ramp minimises the potential effect of the foodstore on the proposed residential accommodation to the north of the store. The 2.5m barrier proposed along this boundary (running parallel to the exit road) will mitigate any effect of both service vehicles and customer vehicles exiting the site. This, when combined with Morrisons' Quiet Delivery System, will allow servicing to occur without disturbing neighbouring residents and affecting residential amenity and obviate the need for any restrictions on servicing of the proposed store.
 - Acoustically significant fixed plant and equipment that is expected to operate 24 hours will need to be adequately controlled to prevent disturbance. As a result the applicant will accept a condition on any permission restricting a maximum noise level of 38dB(A) from this equipment (when measured outside the nearest houses) in order to ensure that this is achieved.
 - The noise produced by goods vehicles driving to and from the site will be similar in character, but less frequent and at a lower level, than that produced by the existing road traffic and the acoustic impact will not change from present.
 - The noise associated with both activities in the car park and petrol filling station is of no acoustic significance and will not affect the amenity of the nearest residents

Air Quality

- 6.15 **Policy 7.14** in the London Plan, the Mayor's Air Quality Strategy and **Policies CP15 and DC52** of the Lb Havering Core Strategy deal with air quality and with Air Quality Management Areas (AQMAs).
- 6.16 The **Air Quality Assessment** undertaken by Atkins confirms that existing air quality within Romford is poor and, as a result, the whole of the Borough is an Air Quality Management Area (AQMA) for PM10 and NO2 related to traffic pollution.
- 6.17 It is predicted that the increased traffic flows associated with the proposed development will not lead to a breach of any air quality standards, with the absolute concentrations of these key pollutants predicted to remain below their respective limits. As a result the existing AQMA should not be affected. The impact of the predicted changes in pollutant concentrations at nearby receptors are described as an imperceptible or small adverse change for key pollutants.
- 6.18 Overall the possible impact to local air quality has been assessed as a low priority consideration. In short, the increases in traffic arising as a result of the development will not lead to a significant degradation in local air quality or increase in exposure, affect the existing AQMA, the local air quality strategy or breach any air quality objectives. According to this analysis there is no apparent requirement for mitigation of an air quality impact due solely to new traffic generation.
- 6.19 More significantly the Assessment indicates that there would be an air quality benefit from the proposal to replace the existing traffic light- controlled junction on Rom Valley Way junction with a roundabout. By optimising the likelihood of free flowing traffic and minimising the potential for queuing or reduced vehicle speeds, and also by aiming for an open junction layout with minimal obstructions to wind blow and air dispersion, this would ensure compliance with national and local government objectives to improve air quality.
- 6.20 In the absence of any existing or proposed residential properties in the immediate vicinity of the proposed petrol filling station, it is unlikely to cause a potential air quality impact

6.21 Finally, although there is likely to be temporary and transient impacts from construction related activities, these can be mitigated by specific vehicle and dust control measures. These can be incorporated in the construction traffic and environmental management procedures of a Construction Management Plan for the development - in line with good construction guidance and practice.

Flood Risk and Drainage

6.22 The Flood Risk Assessment (FRA) prepared by BSCP has been undertaken in accordance with the requirements of paragraph 110 of the NPPF and the associated Technical Guidance. It has also had regard to the requirements of **Policies 5.12 and 5.13** of the London Plan, **Policy CP15** of LB Havering Core Strategy and **Policy DC48** of the Council's Development Control DPD as well as **Policy SSA7** of the Site Specific Allocations DPD require the submission of a FRA in this instance.

6.23 The FRA confirms that application site lies within Environment Agency Flood Zone 1 which has a low probability of flooding and is therefore an entirely appropriate land use for this zone.

6.24 In terms of drainage it is clear that existing ground conditions cannot be used for infiltration due to high concentrations of lead, PAH's and hydrocarbons. According, in order to comply with both best practice and prevailing policies it has therefore been decided to reduce surface water run-off rates to those comparable to 'greenfield' locations by using on-site attenuation. This will be capable of accommodating up to 1 in 100 year return period – making a 30% allowance for anticipated future climate change

6.25 The proposed store will also incorporate a rainwater harvesting system that will re-use roofwater in toilet flushing which will reduce surface water discharge from the development site throughout the year.

6.26 The FRA also demonstrates that there is adequate wastewater infrastructure capacity in the vicinity to accommodate the proposed development consistent with requirements of policy.

Land Contamination

- 6.27 **Policy 5.21** the London Plan requires that appropriate measures should be taken to ensure that development on previously contaminated land does not activate or spread contamination. Similarly Core Strategy **Policy CP15** deals with development involving land that might be contaminated.
- 6.28 The comprehensive Geoenvironmental Assessment prepared by Sirius that accompanies the application deals with the issues of land contamination, ground stability and – in the light of findings from initial investigations - the potential issues associated with unexploded ordnance on the application site.
- 6.29 The Assessment confirms that there are elevated concentrations of Lead, PAH's and hydrocarbons across the site as well as evidence of the presence of asbestos in the topsoil and made ground at the site. As a result the topsoil is not considered suitable for reuse or retention in this instance. Similarly, a subsoil/topsoil cap will also be required to landscaped areas of the development site and, within the area proposed for residential development, a 1m thick engineered cap will be required in landscape and/or garden areas. Gas Protection including hydrocarbon resistant membranes should also be used across the site.
- 6.30 The site investigation also confirms elevated calorific values across the site which will require that services with potential to generate heat should be placed in 'clean corridors' the design of which should be confirmed with local utility companies prior to commencement of development.
- 6.31 Ground conditions mean that piled foundations are recommended for the proposed store.
- 6.32 Finally, on the basis that the desk top assessment has revealed a potential for unexploded ordnance at the site, the applicant has commissioned a specialist survey which has concluded that the risk of unexploded ordnance being present is classed as 'moderate' and appropriate measures will need to be taken to minimise risks associated with groundworks/excavations/piling.

Energy and Sustainability

- 6.33 Sustainability is a key consideration in all Morrisons developments. The application proposals have been designed to incorporate best practice and aspire to achieve the highest sustainable levels possible.
- 6.34 In accordance with requirements of prevailing policy the applicant has commissioned an **Energy & Sustainability Statement** from b:ssec that considers, in detail, the application proposals against the policies in the London Plan on energy and sustainability and specifically the Mayor's 'energy hierarchy.' The matter is also considered in Section 9 of the Design and Access Statement.
- 6.35 The Statement considers in detail the energy issues associated with the proposed development. It demonstrates that the proposed development at Rom Valley way capable of delivering the following:
- A 25% improvement on the carbon requirements of Part L (2010) of the Building Regulations in accordance with the requirements of London Plan **Policy 5.2**;
 - A 20% carbon saving for the store from the use of renewable energy in accordance with **Policy DC50** of the LB Havering Core Strategy; and.
 - A 10% carbon saving for the proposed residential units from the use of renewable energy.
- 6.36 **London Plan Policy 5.3** and **Policy CP17** in the Core Strategy requires new development to meet the highest standards of sustainable design and construction by, for example, making the most effective use of existing land and buildings, reducing carbon dioxide emissions, avoiding internal overheating and heat generation, making the most effective and sustainable use of water, aggregates and other resources, minimising energy use, reducing air and water pollution, managing flood risk and reduce adverse noise impacts.
- 6.37 In order to consider the proposal's compliance with these policies the application is accompanied by a **Sustainable Design and Construction Statement** – again prepared by b:ssec. This outlines the development's strategies for meeting the sustainability targets set out by both the London Plan and the LB Havering's policies.

- 6.38 The Statement uses BREEAM and the Code for Sustainable Homes (CSH) to benchmark this process. These consider the environmental issues of climate change, pollution, impact on occupants and the wider community. They balance these with the need for a high quality, safe and healthy internal environment. These standards go beyond the requirements of the Building Regulations.
- 6.39 The Preliminary Code for Sustainable Homes and BREEAM pre-assessments that have been carried out for the Rom Valley Way development indicate that the residential development will achieve a CSH level 4 rating and the foodstore will achieve a "Very Good" BREEAM rating.

Archaeology

- 6.40 The desk-top **Archaeological Assessment** submitted with this application shows that there is circumstantial evidence that the site may have high potential for containing archaeological deposits of medieval and later date.
- 6.41 Most of the site has been significantly truncated by quarrying, but no evidence has been found to confirm whether the quarrying extended across the western part of the site. Consequently, archaeological deposits may exist in this area and could be impacted. If it considered appropriate, then a watching brief can be undertaken during earthmoving and/or construction in order to ensure any buried assets can be recorded.

Planning Obligations and Mayoral CIL

- 6.42 Finally, the applicant also recognises the potential financial obligations contained in both the Mayoral Community Infrastructure Levy (CIL) and the Council's own draft Planning Obligations DPD.
- 6.43 Calculation of CIL liability of is based the 'net chargeable area,' i.e. the gross internal floorspace being applied for less the gross internal area of any development on the land when permission is granted less any building¹⁷ that is to be demolished as a result of the proposals.
- 6.44 The application scheme proposes a total development of 16,674 sq metres GIA – comprising:

¹⁷ For the purpose of the Regulations such a 'building' is defined as "in use if a part of that building has been in use for a continuous period of at least six months within the period of 12 months ending on the day planning permission first permits the chargeable development."

- new foodstore of 9,732 sq metres GIA;
- A petrol filling station and car wash of 81 sq metres GIA and 12 sq metres GIA respectively; and
- 6,849 sq metres GIA of residential accommodation.

Set against this would, of course, be the existing ice rink building. Based on the information provided by LB Havering, the existing Ice Rink building would comprises 4,652 sq metres GIA. Assuming this remains 'in use' for at least six months prior to planning permission being determined, then this would mean that the 'net chargeable area' would be in the order of 12,022 sq metres GIA. This would generate a potential £240,440 liability under Mayoral CIL.

- 6.45 Additionally in LB Havering's own *draft* CIL Charging Schedule was issued in 2011. This would be levied ***in addition to*** the Mayoral Levy and we have been advised that this likely to be in place by the time any consent is granted. The Borough's draft CIL proposes a 'standard charge' on all residential development which provide a net increase of one dwelling or more. In Romford the charge in the draft SPD is set at £6,000 per dwelling.
- 6.46 On this basis, the proposed residential element of the Rom Valley Way scheme would incur an additional levy of £426,000 – although, like the residential element of the Mayoral CIL, this would ultimately be the responsibility of the developer of the residential scheme rather than the applicant.
- 6.47 The applicant acknowledges that, in principle, the proposed development would be liable to both Mayoral CIL and the Council's own CIL Charging Schedule (assuming it is adopted at the time of approval) – although the detailed calculations one precise liability in both cases would need to be the subject of further discussion were the Council minded to approve the application scheme.

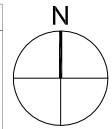
7. SUMMARY AND CONCLUSIONS

- 7.1 This Planning and Retail Statement has described the application site and provided the background to the application proposals. It has outlined the planning policy context at national, strategic and local level within which the application proposals should be considered.
- 7.2 It has then considered, in detail, the retail policy issues raised by the application – namely the extent to which the proposals comply with the ‘sequential approach’ and whether the proposals are likely to lead to ‘significant adverse impact’ sufficient to justify refusal in retail policy terms. It has demonstrated in relation to both matters that the proposals are acceptable.
- 7.3 The Statement has then considered the residential element of the proposals and, although only submitted in outline, has demonstrated the site is capable of accommodating a housing scheme consistent with the relevant policies in both the London Plan and LB Havering LDF.
- 7.4 The assessment has then gone on to show how, although the proposed development may be inconsistent with the existing site allocation in the adopted Site Specific Allocations, it is capable – in conjunction with the Council’s proposals at Mercury Gardens – of delivering the Councils’ objectives of improving leisure provision in the Borough.
- 7.5 The Statement has also demonstrated, with reference to the other detailed assessments accompanying the application, that;
- The Rom Valley Way Site is accessible by a choice of means of transport and will not cause an unacceptable impact on the local highway network;
 - The proposals are consistent with the relevant policies on design, energy and sustainability and, by incorporating latest energy-efficient technologies, will make a positive contribution to national, strategic and local policies on sustainable design and construction as well as policies that seek to mitigate the effect of new development on climate change;
 - That the proposed development will not have an unacceptable effect on the local environment in terms of noise and air quality.
- 7.6 On this basis we believe consent should be granted.



NOTES

- Do not scale from this drawing.
- Check all dimensions on site.
- Subject to survey.
- Subject to site inspection.
- Site boundary lines are indicative only.



PRELIMINARY
NOT FOR CONSTRUCTION

LEGEND



B	Application boundary revised	12.06.28	TA	JC
A	Application boundary added	12.06.27	TA	JC
Rev	Notes	yy.mm.dd	By	Auth

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Date	2012.06.27	Drawn by:	TA	Issued by:	JC
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Project:
**ROM VALLEY WAY
ROMFORD**

Title:
**SITE PLAN
WITH APPLICATION BOUNDARY**

Project No:	Building Zone:	Drawing No:	Revision:
10002		P0-100	B

Development & Building Control
London Borough of Havering
Mercury House
Mercury Gardens
Romford
RM1 3RX
F.A.O. Ms Helen Oakerbee

Email: hpw@chaseandpartners.co.uk

18th July 2012

Our Ref: HPW
Your Ref:

Dear Helen

**TOWN & COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
(ENGLAND & WALES) REGULATIONS 2010
LAND AT ROM VALLEY WAY, ROMFORD
REQUEST FOR SCREENING OPINION**

You will be aware that my client, Optimisation Developments Ltd is intending to submit a planning application for a mixed use development mixed use development comprising foodstore, residential development, car parking and petrol filling station together with access and associated landscaping on the site of the Romford Ice Rink at Rom Valley Way, Romford.

In accordance the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2010 (as amended) ("the EIA Regulations") I am writing to request a Screening Opinion for the proposed development. The attached three copies of a report provides further information on the proposed development and the existing environment, together with environmental studies already undertaken, and the potential effects of the development based on the material currently available.

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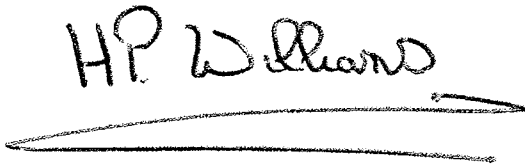
Regulated by RICS

Taking account of the information provided, we hereby seek your opinion on the need for Environmental Impact Assessment for the development and request a formal Screening Opinion in accordance with Regulation 5.

In accordance with the Regulations, we look forward to receiving your Opinion within three weeks of receipt of this letter. When issuing your Opinion, we would be grateful if you could also confirm that you have the delegated authority to do so.

If you require any additional information, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink that reads "Huw Williams". The signature is written in a cursive style. Below the signature is a long, horizontal, slightly wavy line that serves as a decorative underline.

Huw Williams
Partner
For and on behalf of Chase & Partners LLP

Encs:

cc: Richard Haynes - Optimisation Developments Ltd
Martyn Elkington - Kenham Developments Ltd.

**PROPOSED DEVELOPMENT OF
FOOD SUPERSTORE ON LAND AT
ROM VALLEY WAY, ROMFORD**

**ENVIRONMENTAL IMPACT ASSESSMENT
Screening Report**

JULY 2012

PREPARED AT THE OFFICES OF

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APPENDICES

1. Location Plan

1. Introduction

- 1.1 This document accompanies a request to the London Borough of Havering for a formal Environmental Impact Assessment (EIA) Screening Opinion under Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2010.
- 1.2 It is requested on behalf of Optimisation Developments Ltd. in relation to a proposed planning application for a mixed use development comprising foodstore, residential development, car parking and petrol filling station together with access and associated landscaping on the site of the Romford Ice Rink at Rom Valley Way, Romford.
- 1.3 Through the Screening Opinion, the Council would need to determine if the development should be subject to Environmental Impact Assessment (EIA), which would require an Environmental Statement to be submitted with the planning application.
- 1.4 This report provides information on the proposed development and identifies the likely environmental impacts of the development, based on information currently available.
- 1.5 The thresholds and criteria that can trigger the need for EIA are set out in Section 3 of this report. The environment and its sensitive receptors are described along with the potential impacts of the scheme in Section 4 which also describes the studies that have already been undertaken on the site, studies that are ongoing, or those that are proposed. These studies will be reported as part of any planning submission, irrespective of whether a formal ES is requested.

2. THE PROPOSED DEVELOPMENT

2.1 The site is located at Rom Valley Way (A125) to the south west of Romford town centre, in an edge-of-centre location¹ – see Location Plan in **Appendix 1**.

2.2 It is broadly rectangular in shape and currently occupied by the Romford ice rink, surrounding areas of car parking (variably of tarmac, concrete and permeable concrete / 'grasscrete') and associated landscaping, The site is predominantly flat and level, with a gentle downward slope of less than 1m from south west to north east.

Proposed Development Scheme

2.3 The applicant is proposing the development of a mixed use scheme comprising:

- a food superstore with a total gross area 7,572 sq metres with a net sales area² of 3,386 sq metres;
- parking for 450 vehicles (including provision for disabled and 'mother & child' facilities),
- a petrol filling station and car wash;
- 65 residential units comprising a mix of 3 bedroomed town houses and 1 an 2 bed flats;
- landscaping; and
- new access arrangements off Rom Valley Way for both customers and service vehicles.

2.4 Appropriate drainage measures, which would be agreed with the Environment Agency, would be incorporated into the scheme to ensure that it does not cause flooding or increase flooding to the site or other adjacent areas (see Section 4).

¹ As defined in Annex 2 of the National Planning Policy Framework – DCLG – March 2012

² Defined in accordance with the Competition Commission definition as set out in Appendix A of the Good Practice Guidance on Need Impact and the Sequential approach accompanying PPS4 – namely:
"the sales area within a building (i.e. all internal areas accessible to the customer), but excluding checkouts, lobbies, concessions, restaurants, customer toilets and walkways behind the checkouts."

- 2.5 Access to the site during both construction and operation will be off Rom Valley Way.

Timescale for development

- 2.6 It is proposed that a planning application will be submitted to LB Havering in September 2012. Subject to planning permission being granted, it is expected that the proposed store would be operational by 2014.

3. EIA THRESHOLDS AND CRITERIA

- 3.1 EIA developments are defined in the Schedules to 2011 EIA Regulations. These Schedules include descriptions of the types of development covered as well as applicable thresholds and criteria.
- 3.2 An EIA is always required for development listed in Schedule 1 to the Regulations - wherever they are located. The proposed development does not fall under Schedule 1.
- 3.3 Descriptions of development as well as the thresholds and criteria to be used for defining "Schedule 2 development" are also set out in the Regulations. The proposed development would fall within "Infrastructure Projects" (10(b)) - namely:
- "Urban Development Projects including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas."*
- 3.4 The proposed development also falls within the applicable threshold in that the site area exceeds 0.5 hectares.
- 3.5 As the proposed development falls into Schedule 2 it requires 'screening' for EIA by Havering Council. The Council needs to determine whether the scheme is likely to give rise to "*significant effects on the environment by virtue of factors such as its nature, size or location*" and thereby require EIA.
- 3.6 The Council are required to base its decision on the selection criteria set out in Schedule 3 of the Regulations. It should have regard to the characteristics of the development (e.g. its size, use of natural resources, quantities of pollution and waste generated); the environmental sensitivity of the location; and the characteristics of the potential impact (e.g. its magnitude and duration).

- 3.7 EIA will normally be needed for Schedule 2 developments in three main types of case - namely:
- (i) for major developments which are of more than local importance;
 - (ii) for developments which are proposed for particularly environmentally sensitive or vulnerable locations; and
 - (iii) for developments with unusually complex and potentially hazardous environmental effects.
- 3.8 Given the potential range of Schedule 2 development, and the importance of location in determining whether significant effects on the environment are likely, there are no specific criteria or thresholds which determine whether or not EIA is required. Each application (or request for an opinion) should be considered on its own merits based on what is proposed by the developer.
- 3.9 Circular 2/99 offers a broad indication of the type or scale of development which is likely to require EIA and, conversely, an indication of the sort of development for which EIA is unlikely to be necessary. Annex A of the Circular sets out the criteria and/or thresholds which indicate the types of case in which EIA is more likely to be required and the types of impact that are most likely to be significant for particular types of development.
- 3.10 In the case of 'urban development projects', regard should be given to the physical scale of the proposals and particular consideration should be given to the potential increase in traffic, emissions and noise. In terms of scale the Circular indicates that – at least in cases where sites have not been intensively developed – that EIA may be required in cases significantly larger than proposed in this instance (i.e. where the site area is more than 5 hectares; or would provide a total of more than 10,000 m² of new commercial floorspace; or the development would have significant urbanising effects in a previously non, urbanised area.
- 3.11 Similarly EIA is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination.

- 3.12 The information provided in this report has been submitted to help inform the Council's Screening Opinion with regard to these matters.
- 3.13 In making its decision the Council will be aware that the Regulations have always required the planning authority to provide a statement of reasons for any decision **requiring** EIA. In cases where EIA is not required, the advice from the Chief Planner issued in November 2009 indicated that negative screening did not require reasons to be given by the planning authority unless these were specifically requested by an interested party. In which case the request should be met with not only with a statement of the reasons, but also copies of information and relevant documents.
- 3.14 Regulation 4(7)(a) of the 2011 Regulations now impose an obligation on the planning authority to provide accompanying reasons when issuing a negative screening in the form of a "*written statement giving clearly and precisely the full reasons for that conclusion.*"
- 3.15 Irrespective of whether an EIA is required or not, planning permission for the proposed development will still be required and, to this end, a series of reports considering the environmental implications of the development will accompany the application. These are described in Section 4.

4. POTENTIAL ENVIRONMENTAL EFFECTS

Traffic and Access Effects

- 4.1 During the operational stage increased vehicle movements associated with the development may have an effect on existing users of the local road network. Under the IEMA Guidelines (Guidelines for the Environmental Assessment of Road Traffic) 12 hour traffic flows along Rom Valley Way (and other nearby roads) would need to increase by 30% for effects such as delay and accident and safety effects on pedestrian, cyclists and drivers to be significant.
- 4.2 An initial assessment of the likely increase in traffic flows associated with the proposed development indicate that the maximum impact on Rom Valley Way is likely to be around 11%.
- 4.3 Levels of construction traffic are not known at this stage but will primarily be associated with site clearance and the removal of any demolition or excavated material and the import of building materials and concrete. There is the potential for limited effects on existing users of the local road network – although any such effects will be temporary for the duration of construction. Mitigation measures can be implemented during the construction period to restrict construction traffic to appropriate routes and time traffic movements to avoid peak hours.
- 4.4 A full Transport Assessment (TA) will be undertaken to assess the effects of the development on the surrounding highway network. This will be undertaken in accordance with prevailing policy guidance for transport and in consultation with both Transport for London and LB Havering. A travel plan will also be provided as part of the planning application in order to mitigate the operational effects of the development.

Air Quality Effects

- 4.5 The site is within an Air Quality Management Area. During the operational phase of the development there may be adverse effects on local air quality associated with increased vehicle emissions.

- 4.6 During construction there may be temporary air quality effects relating to emissions from construction vehicles and vehicles delivering materials to the site. The number and routes of construction vehicles have not been determined at present but are unlikely to significantly affect existing air quality. Activities during construction can also be effectively controlled through dust suppression measures e.g. damping down of surfaces by water bowsers, wheel/body washing of mobile plant etc.
- 4.7 As indicated above, an initial assessment of likely operational traffic effects indicates that although traffic flows may change they are unlikely to be of an order to significant affect local air quality.
- 4.8 An Air Quality Assessment will be undertaken and will be submitted with the planning application in order to establish whether the proposal would affect local air quality. It is anticipated that this will make use of the latest air quality information that the LB Havering has obtained from the Environmental Resource Group at Kings College in order to establish the existing 'baseline' position and will set out what mitigation, if any, would required to mitigate any air quality effects.

Noise Effects

- 4.9 The development will lead to more activity on the site than at present. Although traffic is expected to increase it is not anticipated that this will lead to a material increase in noise having regard to prevailing levels. The proposed development will, of course, be designed to comply with the requirements of the Building Regulations in relation to noise.
- 4.10 The construction phase could lead to a temporary increase in noise and vibration levels, although this is unlikely to lead to any disturbance to local residents. Good practice measures for noise and vibration control can be implemented during demolition/ construction in accordance with BS 5228 including minimising the use of percussive demolition techniques, undertaking on-site processing and re-use of demolition materials to minimise vehicle movements and adherence to daytime working only.

- 4.11 The application will be accompanied by a noise assessment which will present the results of an assessment of the acoustic impact of the proposals and, outline, if necessary, the measures that will be undertaken to mitigate any noise effects arising as a result of the development.

Biodiversity Effects

- 4.12 The proposed development has potential to disturb existing wildlife habitats. It is understood that the site currently has limited ecological value for protected or otherwise notable species and habitats. However, a comprehensive ecological assessment would be undertaken and submitted in support of the planning application.
- 4.13 As well as considering the current ecological value of the site and what mitigation may be required to protect any species and/or features of value, it will also identify what opportunities might exist as part of the proposed development scheme to provide enhanced ecological value and to contribute to relevant local policy targets.

Water, Flood Risk and Site Drainage Effects

- 4.14 As the development is over 1ha it will require a Flood Risk Assessment (FRA) under the provisions of paragraph 103 of the NPPF; a FRA will therefore be provided in support of the planning application.
- 4.15 The Environment Agency's flood maps indicate that the site is not liable to flooding and significant effects off-site are unlikely provided appropriate design measures are incorporated into the scheme.
- 4.16 The development has the potential to increase existing on-site run-off rates and the risk of flooding off-site by increasing the area of hardstanding within the water catchment. Measures will therefore be incorporated into the design of the development to reduce run-off from the development - making an allowance for future climate change - to ensure that run-off is no greater than that for the current site.
- 4.17 There is the potential for contamination of groundwater from contaminants mobilised during the construction phase. However, the site is not within a Groundwater Protection Zone and there are no surface watercourses in close proximity to the site (the nearest water feature is located 1km south east of the

site). In addition to any conditions imposed on the development to prevent contamination the applicant would also ensure that good practice was adopted during the construction stage in accordance with the Environment Agency's Pollution Prevention Guidelines.

Land Quality Effects

- 4.18 A preliminary desktop study was undertaken on behalf of the applicants in May 2012. This indicates that the surrounding area is landfill, although the precise extent of quarrying (and subsequent landfilling) is difficult to interpret from available historical data.
- 4.19 The information that is available indicates that the site is underlain by a variable thickness of made ground (up to 4.2m thickness proven in boreholes drilled on site), variably overlying sand and gravel and organic clays. London Clay strata has been proven at depths ranging from 4.7 to 6.3m beneath the site. Further more detailed site investigations will now be undertaken to provide further information and to facilitate detailed designs of the proposed development. At this stage it is anticipated that some form of ground improvement will need to be incorporated in the proposed development.
- 4.20 Given the previous use of the site and evidence of landfilling, there is potential for hazardous ground gases (methane and carbon dioxide) to be present. The precise nature of the risk will be investigated further through site investigation and the application will be accompanied by a comprehensive ground condition survey.
- 4.21 The mobilisation of contaminants during the demolition of existing buildings and structures and during construction can lead to adverse effects. Potential heavy metals, asbestos fibres, organic and inorganic contaminants in either made ground or in landfill material and shallow soils may pose a potential risk to construction workers, site end-users and controlled waters. A pre-demolition asbestos survey should be undertaken prior to any demolition works.
- 4.22 The following measures will also be considered to mitigate any potential effects arising from the disturbance of contaminated material during construction:
- use of personal protective equipment (PPE) and implementation of good working practices

- Identification of areas of contamination and planning for discovery of unexpected contamination
- Implementation of protective measures for correct storage and transport; spill prevention
- Implementation of dust and surface runoff control measures.

4.23 These measures would be incorporated, as required, into a Construction Environmental Management Plan for the development should consent be granted.

4.24 Similarly the development will incorporate appropriate measures to minimise the risk the proposed development may present in terms of ground contamination arising through run-off of contaminants or through leakage from storage tanks, etc.

Landscape and Visual Effects

4.25 The design and layout of the development will have regard to any potentially sensitive visual receptors. The Design and Access Statement accompanying the application will include a comprehensive Visual Impact Assessment to consider effects of the development on local views and amenity.

4.26 Any visual effects during the construction phase will be temporary and only endure for the duration of construction.

Cultural Heritage Effects

4.27 The site does not lie within a Conservation Area but is located in an Archaeological Priority Area. There may therefore be potential for damage to undiscovered below ground archaeology during the construction phase – although this is considered unlikely on the basis that site is already developed and the ground will therefore have been previously disturbed. Further advice will however be sought from English Heritage - Archaeology regarding a watching brief - if one is required.

4.28 The location of the site and nature of surrounding properties means it is unlikely that the site will have any effects on the setting of any off-site cultural heritage features.

Socio-Economic Effects

- 4.29 The development will result in a positive effect through improved shopping facilities for the local community and increased employment opportunities for local residents. Any adverse effects on the local community or economy will be assessed as part of the Retail Assessment accompanying the application.
- 4.30 During the construction phase, there may be a short term increase in demand on local shops, services and accommodation during construction which will have a beneficial effect on the community.

Cumulative Effects

- 4.31 Potential cumulative impacts with other proposed developments in the vicinity of are not known at this stage. They will be discussed in the reports which will accompany the planning application for the proposed development.

5. SUMMARY

- 5.1 This report describes current proposals for the development of a mixed use development comprising a foodstore, residential development, car parking together with access and associated landscaping on the site of the Romford Ice Rink at Rom Valley Way, Romford.
- 5.2 It has been established that the development falls within part of 'Schedule 2' of and exceeds the thresholds set out in the 2011 EIA Regulations.
- 5.3 On the basis that the proposed development falls into Schedule 2 it requires 'screening' by Havering Council to decide if the development should be subject to Environmental Impact Assessment, which would require an Environmental Statement to be submitted with the planning application. This report, therefore, accompanies a request to the Council for a formal EIA Screening Opinion under Regulation 5.
- 5.4 The Council is now required to determine whether the scheme is likely to give rise to "significant environmental effects." Preliminary information has been provided in relation to traffic and access; air quality; noise; biodiversity, water, flood risk and site drainage; land quality; landscape and visual impact; cultural heritage; socio-economic and cumulative effects which demonstrates that whilst the development will have a number of environmental effects, none of these are likely to be significant and would not justify EIA in this case.
- 5.5 We therefore invite the Council to consider the information contained in this submission and confirm whether EIA is required. In accordance with the requirements set out in Regulation 4(7)(a) we would request that the decision is accompanied by a written statement giving clearly and precisely the Council's reasons for reaching the decision it has.

Chase & Partners

July 2012

NOTES

- 1. All dimensions are in meters.
- 2. All dimensions are to the center of the structure unless otherwise stated.
- 3. All dimensions are to the center of the structure unless otherwise stated.
- 4. All dimensions are to the center of the structure unless otherwise stated.

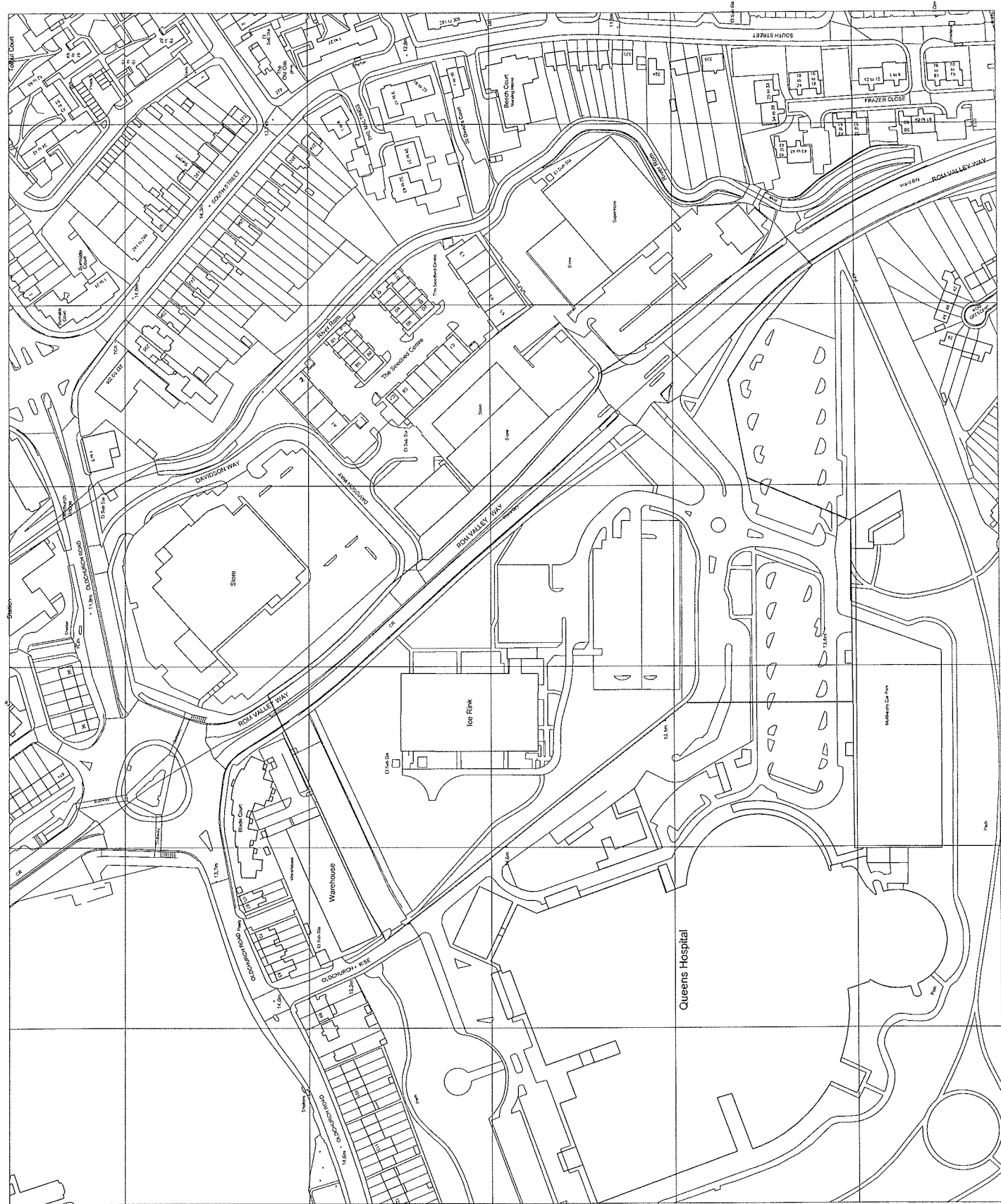
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PRELIMINARY
NOT FOR CONSTRUCTION

LEGEND



Application Boundary



Project Name	ROM VALLEY WAY
Client	ROMFORD
Site No.	10002
Scale	1:1000
Date	10/2022
Author	J.C.
Checker	J.C.
Approver	J.C.

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Project Name	ROM VALLEY WAY
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Checker	J.C.
Approver	J.C.

ENVIRONMENTAL IMPACT ASSESSMENT SCREENING OPINION

DATE OF RECEIPT 19 July 2012

PROPOSAL: Z00010.12 Request for Screening Opinion under the Town and Country Planning (Environmental Impact Assessment) Regulations 2011

Redevelopment of Ice Rink to provide a mixed use development comprising a foodstore, residential development, car parking and petrol filling station together with access and associated landscaping

LOCATION: Land at Romford Ice Rink, Rom Valley Way, Romford

SITE AREA: 5.48 hectares

INTRODUCTION

A request for a screening opinion under the Town and Country Planning (Environmental Impact Assessment) Regulations has been submitted.

Schedule 1 projects will require EIA in all cases, whilst Schedule 2 projects will only require EIA where there is a likelihood of significant effects on the environment.

Schedule 2 to the 1999 EIA Regulations sets out the descriptions of development and applicable (and indicative) thresholds and criteria for the purpose of classifying development as Schedule 2. Schedule 2 projects have to be listed in Schedule 2 and either be in whole or in part in a '*sensitive area*' or meet certain criteria or exceed certain thresholds in order for an EIA to be required. The basic test is the likelihood of significant effects on the environment arising from development by virtue of factors such as their nature, size or location. Government guidance on the matter is that, in general EIA will be needed for Schedule 2 developments in three main types of case;

- a) For major developments of more than local importance;
- b) For developments which are proposed in particularly environmentally sensitive or vulnerable locations; and
- c) For developments with unusually complex and potentially hazardous environmental effects.

DETERMINATION OF WHETHER SCHEDULE 1 OR SCHEDULE 2 PROJECT

The proposal does not fall into any of the categories listed in Schedule 1 of the Regulations. However, it does fall within category 10(b) of Schedule 2. This category covers urban development projects with an area of more than 0.5 hectares.

Proposed development

The site is currently occupied by Romford Ice Rink with its associated car parking and landscaping. The site has an area of 5.48 hectares.

The proposed development involves the construction of a mixed use development comprising:

- A Food Superstore with a total gross floor area of 7,572sq.m with a net sales area of 3,386sq.m
- Parking for 450 vehicles
- A Petrol Filling Station and Car Wash
- 65 residential units comprising a mix of 3 no. bedroom town houses together with 1 no. and 2 no. bed flats
- Landscaping
- New access arrangements off Rom Valley Way

Assessment of the proposed development

The area for the proposed redevelopment exceeds 0.5ha and although not specifically listed in the schedule, the type of development constitutes an urban development project. Accordingly it has been judged by staff that the proposal should be considered to be a Schedule 2 application. Guidance on the assessment of Schedule 2 projects advises that in addition to the physical scale of such developments, particular consideration needs to be given to the potential increase in traffic, emissions and noise. EIA is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination.

Guidance also suggests that development proposed for sites which have not previously been intensively developed are more likely to require EIA if the site area of the scheme is more than 5 hectares; it would provide a total of more than 10,000sq.m of new commercial floorspace or; if the development would have significant urbanising effects in a previously non urbanised area, such as a new development of more than 1,000 dwellings.

Assessment criteria

The method of assessing the effects of projects is generally set out in Schedule 3 of the Regulations. These can be split into three components:

- Characteristics of the development. Is the development of more than local importance?
- Location of the development. Is it located in a particularly sensitive or vulnerable location?
- Characteristics of the potential impact. Are there potentially complex or hazardous effects?

CHARACTERISTICS OF THE DEVELOPMENT

<p>Size of the Development</p> <ul style="list-style-type: none"> • Will it be out of scale with the existing environment? • Will it lead to further consequential development or works eg infrastructure? 	<p>The site has been previously developed. The proposed development differs from the development it replaces.</p> <p>However, the mixed use development is compatible in principle with the local environment and would not be of such scale as to require EIA.</p> <p>It is not considered that further significant consequential development or infrastructure works would be likely as a result of this development.</p> <p>Conclusion: No significant effect as the scale of development and associated works have only a localised impact that can be addressed through the detailed design of the proposals.</p>
<p>Cumulation with other Development</p> <ul style="list-style-type: none"> • Are there any other developments proposed that will lead to a cumulative effect? • Will the development affect any other projects that are planned in the vicinity? 	<p>The scheme forms part of a proposal which includes the provision of a new Ice Rink and Swimming Pool complex elsewhere within Romford Town Centre. However, the effects of the development are self-contained in their own right such that there are no significant cumulative implications.</p> <p>The development will not affect any other projects that are planned the vicinity.</p> <p>Conclusion: No significant effect.</p>
<p>Use of natural resources</p> <ul style="list-style-type: none"> • Will valuable or scarce resources be affected? 	<p>The use proposed is a conventional development and would not be a primary user of valuable or scarce resources.</p> <p>The materials likely to be used in the construction would not be classified as valuable resources.</p> <p>Conclusion: No significant use or impact on scarce resources.</p>
<p>Production of Waste</p>	<p>The demolition of the existing Ice Rink building is the</p>

<ul style="list-style-type: none"> • Will the proposal produce solid wastes during operation, construction or decommissioning? 	<p>subject of a separate Screening Opinion, which has been submitted in association with a Prior Approval for Demolition. The proposal will not produce solid wastes during operation or construction.</p> <p>Conclusion: No significant impact upon the production of waste.</p>
<p>Pollution and Nuisances</p> <ul style="list-style-type: none"> • Is there a risk of environmental standards being breached? • Will the project risk the release of contaminants with potential to pollute the land or groundwater? • Will the project release pollutants or noxious, hazardous or toxic substances to air? • Will the project cause noise and vibration or release of light, heat energy or electromagnetic radiation? 	<p>A preliminary desktop study was submitted in May 2012. This study indicates that the surrounding area is landfill, although the precise extent of quarrying and subsequent landfilling is difficult to interpret from available historical data. It is anticipated that some form of ground improvement will need to be incorporated in the proposed development.</p> <p>Given the previous use of the site and evidence of land filling, there is potential for hazardous ground gases to be present and released to the land or groundwaters. The precise nature of the risk would be investigated further through site investigation and it is expected that any planning application would be accompanied by a ground condition survey.</p> <p>In addition to ground gases, heavy metals, asbestos fibres and organic/inorganic contaminants in either made ground or in landfill material and shallow soils may post a potential risk to construction workers, end-users and controlled waters, through the demolition of the existing buildings.</p> <p>Noise and vibration may be generated by the construction of the development. However, if the development is permitted this is something that could be adequately controlled via condition. There may be some short term increase in dust during the construction phase. This is not expected to be a significant impact and again, could be controlled by condition.</p> <p>The site is within an Air Quality Management Area. During both construction and the operational phase of the development, there is expected to be an increase in the number of vehicles accessing the site, but the pollution generated by this is not anticipated to be significant enough to require an EIA.</p> <p>Conclusion: Subject to the appropriate surveys being</p>

	<p>undertaken and the employment of suitable mitigation measures, the impact of the development is not considered to be significant</p>
<p>Accident Risk</p> <ul style="list-style-type: none"> • Will there be any risk of accidents during construction or operation of the Project which could affect human health or the environment? 	<p>There would be the usual inherent risks to workers and others during the construction of the project. Operations on the site may relate to accidents associated with the machinery and transportation. No accidents involving human health or the environment are considered likely to result from this development.</p> <p>Conclusion: No significant accident risk.</p>
<p>Other Characteristics</p> <ul style="list-style-type: none"> • Permanent or temporary change in land use, land cover or topography including increases in intensity of land use? • Clearance of existing land, vegetation and buildings? • Loss of native species or genetic diversity? 	<p>The site has been previously developed for leisure purposes, so land use will change as a result of the development. There will be a change in the characteristics of the site given the intended use for a foodstore, petrol filling station, car parking and residential purposes.</p> <p>There are no significant landscape features within the site and the existing building is of no architectural or historic merit. The visual impact of the development can be addressed through the application process and does not have wider environmental implications sufficient to justify an EIA</p> <p>In respect of ecology the site is not within a designated SINC and does not fall within any statutorily protected areas. No significant impacts in this respect are therefore anticipated. However, a biodiversity report can be required as part of the application process and mediation/mitigation required, where necessary, through the design of the scheme and/or planning conditions.</p> <p>The development will require a Flood Risk Assessment due to the site area. The development has the potential to increase on-site/off-site surface water run-off rates due to an increase in hardsurfacing. Measures can be incorporated within the development design to reduce run-off.</p> <p>Conclusion: No significant effect.</p>

LOCATION OF THE DEVELOPMENT

<p>Existing land use</p> <ul style="list-style-type: none"> • Will the construction cause physical changes to the locality? • Is the project in a previously undeveloped area where there will be loss of green field land? • Will any areas of important sensitive, historic or, landscape value, or protected species be affected? • Are there any transport routes around the location that are susceptible to congestion or which cause environmental problems? 	<p>This is a previously developed site and there would be no loss of greenfield land. The proposed development would change the nature of the site. However, these physical impacts are confined to the existing site and the immediate vicinity and would not change the wider locality.</p> <p>The site is not located within a Conservation Area or the Green Belt. However, it is located within an Archaeological Priority Area. As the site is previously developed, any archaeological remains may have already been disturbed. Nevertheless, a watching brief can be put in place should permission be granted.</p> <p>The site is not within a 'sensitive area' as defined by the EIA Regulations and is not within a SIN. It is not anticipated that there would be a harmful impact on protected species or landscape value but this could be adequately assessed through the submission of a biodiversity report with the application and mitigation/mediation of any adverse impacts addressed through the design of the scheme and/or conditions.</p> <p>The proposal will create a foodstore, petrol filling station, a 450 space car park and a residential development of 65 units. This is an increase on the current amount of development but not to such a significant extent that there would be more than a localised impact on local traffic routes. Any planning application would need to be accompanied by a full Transport Assessment.</p> <p>Conclusion: The development will have some impact in these respects. However, based on the scale of the development proposed, the effect is not considered to be so significant as to justify a requirement for EIA.</p>
<p>Relative abundance, quality and regenerative capacity of natural resources in the area</p> <ul style="list-style-type: none"> • Are there any areas on or around the 	<p>The proposal will make little use of natural resources other than those normally associated with a construction project. These materials are abundant and would not have a significant impact upon natural resources.</p> <p>Conclusion: No significant effect.</p>

<p>location which contain important, high quality or scarce resources which could be affected by the development?</p>	
<p>Absorption capacity of the natural environment as densely populated area</p> <ul style="list-style-type: none"> • Are there existing land uses e.g. homes and gardens on or around the location which could be affected by the project? • Are there any areas on or around the location which are densely populated or built up, which could be affected by the project? • Are there any areas around the location which are protected under international or national or local legislation for their ecological, landscape, cultural or other value, which could be affected by the development? • Are there any other area on or around the location which are important or sensitive for reasons of their ecology? 	<p>The site is located to the east of Queens Hospital, to the south of a warehouse building and to the west of the Rom Valley Way Retail Park. The nearest residential accommodation is located on Oldchurch Road (to the north west) and Rom Crescent (to the south east). The likely impacts of the proposal would not be of an exceptional nature and can be addressed through the detailed design of the proposals.</p> <p>The proposal will not affect any areas which are protected under international or local legislation for their ecological, landscape, cultural or other value, aside from the Archaeological Priority Area identified above.</p> <p>A biodiversity report, which includes various species surveys, could be required as part of any planning application submission. Further mitigation works could be required through the design of the proposals or planning conditions if necessary.</p> <p>Conclusion: No significant impact upon the natural environment is immediately apparent and impact on neighbouring residential properties can be mitigated through the detailed design of the proposal.</p>

<ul style="list-style-type: none"> • Are there any areas on or around the location which are used by protected, important or sensitive species of fauna or flora eg. for breeding, nesting, foraging, resting, overwintering, migration, which could be affected? 	
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CHARACTERISTICS OF THE POTENTIAL IMPACT

<p>Extent of the impact</p> <ul style="list-style-type: none"> • Will the effect extend over a large area? • Will many people be affected? 	<p>The extent of the impact of the project would be largely confined to the immediately surrounding area. Some additional impact may be noticed during construction but this would only be for a limited duration. There would be some additional traffic generation once the foodstore and petrol filling station are operational but the effects of this would be largely localised and not sufficient to justify EIA.</p> <p>Conclusion: No significant effect.</p>
<p>Transboundary nature of the impact</p> <ul style="list-style-type: none"> • Will there be any potential for transboundary impact? 	<p>The development will have a localised impact.</p> <p>Conclusion: No significant effect.</p>
<p>Magnitude and complexity of the impact</p> <ul style="list-style-type: none"> • Will there be a large change in environmental conditions? • Will the effect be unusual in the area 	<p>Although there will be impacts arising from the development, for example the impact of the built form, traffic and parking implications, these are not of an unusual or excessive magnitude and are not judged to result in a significant change to existing environmental conditions to justify EIA.</p> <p>The impacts are those that would be commonly associated with a mixed use development of this scale and are not considered to be particularly complex or unusual.</p>

<p>or particularly complex?</p> <ul style="list-style-type: none"> • Will many receptors other than people be affected? 	<p>Conclusion: No significant effect sufficient to require EIA.</p>
<p>Probability of the impact</p>	<p>The impacts considered in this assessment would be likely to occur. However, it is considered they can be reasonably addressed through the detailed design of the proposals</p> <p>Conclusion: No significant effect.</p>
<p>Duration, frequency and reversibility of the impact</p>	<p>Visual impact will be permanent, or for the lifetime of the development. The impacts would be reversible upon an alternative redevelopment of the site.</p> <p>The impact upon the local road network will vary on a daily basis, depending on traffic flows into and out of the development site. Subject to the detailed design of the proposals and a Transport Assessment, it is not considered that the impact arising would be so significant as to warrant EIA.</p> <p>Conclusion: No significant effect sufficient to require EIA</p>

CONCLUSION

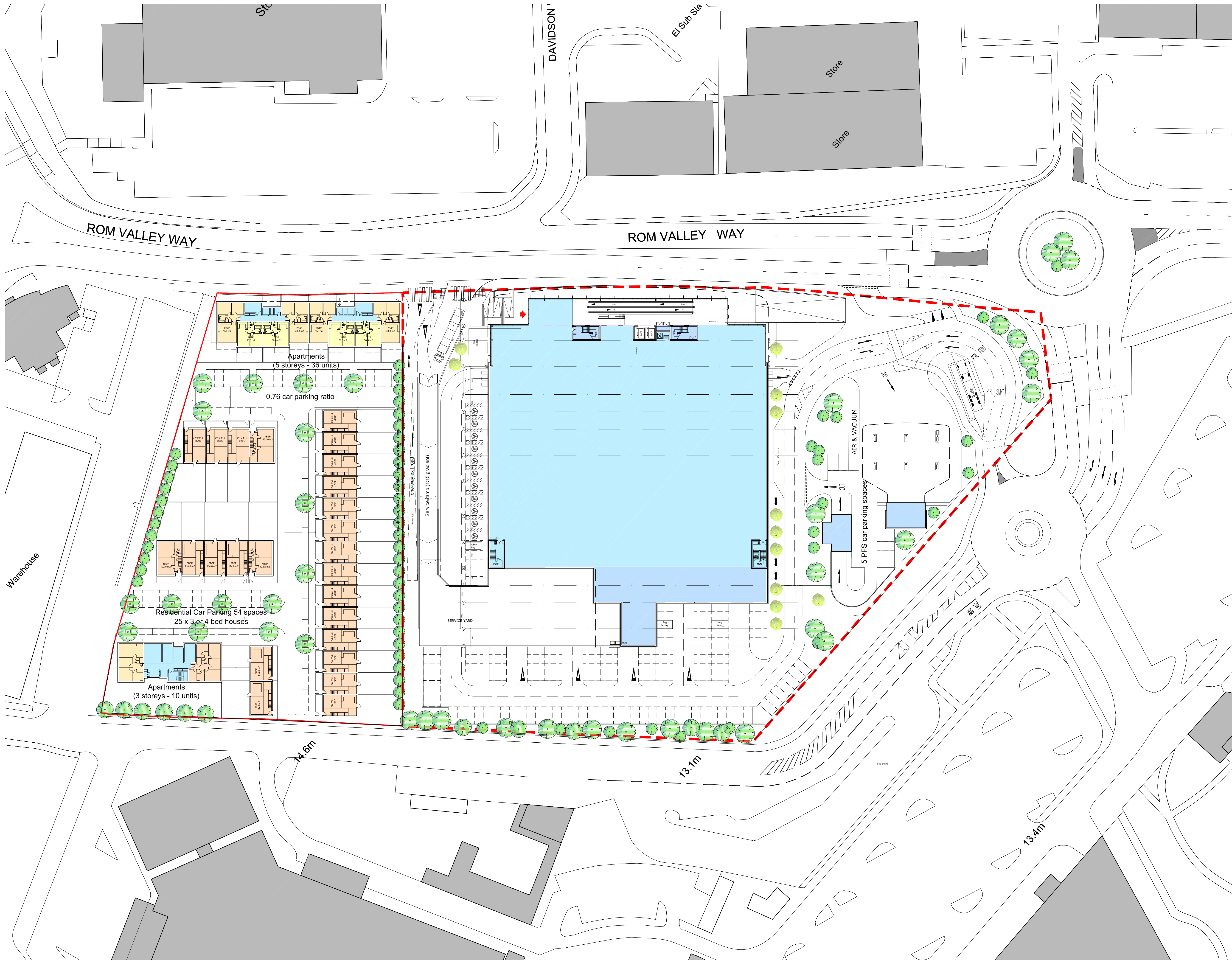
In assessing the need for EIA three components have to be considered. The project would not be a major development of more than local importance, the site is not in an environmentally sensitive or vulnerable location and there would be no unusually complex or potentially hazardous environmental effects. There is no significant evidence of environmental harm resulting from the proposal. Taking all of the above considerations into account it is concluded that the development of the site for a foodstore, petrol filling station, 450 space car parking and 65 residential units would not be likely to have significant effects on the environment

The conclusion is that the development is a Schedule 2 application but is not an EIA development and that EIA is not required.

Signed and Adopted on 9 August 2012

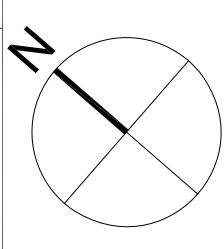
A handwritten signature in black ink that reads "Simon Thelwell". The signature is written in a cursive style with a large initial 'S'.

Simon Thelwell
Planning Control Manager



NOTES

- Do not scale from this drawing.
- Check all dimensions on site.
- Subject to survey.
- Subject to site inspection.
- Site boundary lines are indicative only.



PLANNING
NOT FOR CONSTRUCTION

Rev	Notes	yy.mm.dd	By	Auth
H	Amended Scheme	12.10.25	MG	JC
G	Amended Scheme	12.10.10	MG	JC
E	Amended PFS	12.10.05	MG	JC
D	Amended layout	12.10.01	MG	JC
C	Amended layout	12.09.24	MG	JC
B	Amended layout	12.08.24	MG	JC
A	Service yard rearranged	12.08.09	MG	JC

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Date: 19.04.2010
 Scale: 1:500 @ A1
 1:1000 @ A3
 Drawn by: IF
 Issued by: JC
 CAD File No: P:\10003\CAD\Planning\1 Plans\P1-102.dwg

Project:
ROM VALLEY WAY ROMFORD
 Title:
First Floor Plan

Project No:	Building:	Zone:	Drawing No:	Revision:
10002	A2_P1-102	G

APPENDIX 5

Health Checks of Romford and nearby centres

1. Introduction

1.1 Chase & Partners have undertaken an assessment of the current health and vitality of Romford and the two centres that are most likely to be affected by the application proposals – namely the designated 'Major District Centre' at Hornchurch and the 'Minor District Centre' at Elm Park.

1.2 Where reliable information is available, we have endeavoured to use the well-established indicators of vitality and viability – namely:

- Diversity of main town centre uses;
- Amount of retail, leisure and office floor space in edge and out of centre locations;
- Potential capacity for growth, or change of centres in the network;
- Retail representation and intentions to change representation;
- Vacancies;
- Commercial rents and yields;
- Land values and the length of time key sites have remained undeveloped;
- Pedestrian flows;
- Accessibility;
- Customer and resident views and behaviour;
- Perception of safety and occurrence of crime; and
- State of the town centre environmental quality.

1.3 In preparing this assessment we have also had regard to the findings of the Retail and Commercial Needs Assessment undertaken on behalf of the Council by GVA earlier this year and make comparisons where appropriate.

2. Romford

2.1 Romford is a designated 'Metropolitan Centre' in the London Plan and the largest retail centre in the Borough. Originally a market town, centred on the Market Place (which now forms part of the Conservation Area) and South Street, the centre has expanded considerably and now includes two major covered shopping areas - The Liberty and Mercury Mall. These centres are complemented by The Brewery development – which provides large format retail accommodation anchored by a major Sainsbury's foodstore, together with a commercial leisure complex including cinema, bowling alley, health club and various restaurants and bars.

2.2 Diversity of Uses

2.2.1 There are currently 593 units trading in Romford comprising approximately 228,501 sq metres gross floorspace - the composition of which is shown in **Table 1** below.

Table 1: Uses in Romford Town Centre

Category	Units			Floorspace (sq metres)		
	Number of Units	%	National Average (%)	Sq m	%	National Average (%)
Convenience	42	7.08	7.98	23,384	10.23	14.36
Comparison	210	35.41	33.05	116,317	50.9	36.55
Service	267	45.02	46.51	65,608	28.71	38.93
Vacant	74	12.48	12.22	23,192	10.15	10.16
Total	593	-	-	228,501		-

Source: Experian Good Category Report – July 2012 (adjusted to account for upper floors)

Chase & Partners Street Survey

2.2.2 Although both the number and amount of convenience floorspace in the centre is below the national average, the centre includes two major foodstores – the Sainsbury's store at The Brewery and the Asda store in the Dolphin Centre. Collectively the convenience floorspace in these two stores amount to over 40% of the total convenience floorspace in the centre as a whole.

2.2.3 Additionally there is also a foodhall in the Marks & Spencer store, an Iceland at Lidl at the junction of South Street and Atlanta Boulevard. These stores are complemented by a series of small independent convenience retailers and specialists on the Market Square, South Street and in the Romford Shopping Hall.

- 2.2.4 In addition to the permanent retail floorspace included in **Table 1** there is also a long-established and popular outdoor street market held in the Market Place on Wednesday, Friday and Saturday. As well as providing a particular attraction for many shoppers to Romford, the market also includes traders offering a range of fresh goods which further enhance the existing convenience 'offer' in the town centre.
- 2.2.5 Over half the existing floorspace in Romford town centre is currently devoted to comparison goods – a figure significantly above the national average. The town has a notably strong clothing and footwear offer (particularly in the Liberty Shopping Centre) with strong representation of national multiple fashion chains throughout the centre.
- 2.2.6 Romford also enjoy a good range of service outlets – including banks, building societies, health and beauty salons, etc. – as well as with an array of eating and drinking establishments. There is concentration of bars and late night activities on South Street in the vicinity of the Station, whilst The Brewery provides the focus for more family-orientated commercial uses.
- 2.2.7 Although the number of vacant units has increased marginally since GVA undertook its survey in 2011, the total amount of vacant floorspace in the town centre has declined and remains comparable with the national average.

2.3 **Retail Floor Space in Edge of Centre and Out of Centre Locations**

- 2.3.1 Outside the town centre there are a number of out-of-centre retail developments.
- 2.3.2 To the south – and opposite the application site – is the Rom Valley Way Retail Park; this includes Homebase, Mothercare World and Pets at Home stores. Beyond this, on Hornchurch Road, is the Roneo Corner Retail Park which comprises a Tesco Extra store and B&Q.
- 2.3.3 North of the town centre, is the Eastern Avenue Retail Park – including Currys, The Carphone Warehouse, PC World and Dunelm.
- 2.3.4 The largest out-of-centre development is at Gallows Corner. This includes another Tesco Extra store together with DFS, Argos Extra, Halfords, Magnet, Furniture Village, Harveys, SCS and the unit occupied , until recently, by Comet unit.

2.3.5 It is clear from the household survey undertaken by GVA that these facilities achieve a significant market share of both the convenience and comparison expenditure available in the area and this has increased since the previous survey in 2006.

2.4 **Potential for Growth**

2.4.1 The opportunities for major new development beyond existing commitments in Romford town centre are limited.

2.5 Permission already exists for two development that could create around 5,000 sq meters of additional retail floorspace in the town centre. The first proposals involves the redevelopment of 44-54 Market Place to provide around 2,500 sq metres of new retail floorspace in the form new shop units fronting Swan Walk and the Market Place. The second is the proposed mixed use development at Angel Way (see Section 4) where planning permission was granted at appeal in December 2009 for a high density mixed-use development of 350 residential units, a 63-bedroom hotel and ground-floor retail accommodation comprising around 2,300 sq meters.

2.5.1 Beyond these two proposals, there are no other major development opportunities capable of accommodating major retail development and, as GVA highlight, major developer interest in new schemes in the current market is very limited.

2.6 **Retailer Representation and Intentions to Change Representation**

2.6.1 The level and quality of existing retailer representation provides a measure of the strength of any centre. It is clear from the Goad Category Report and our street survey that Romford currently provides an excellent range of retailers – and a particularly strong representation of national comparison goods multiples.

2.6.2 Another important factor in assessing the retail health of any centre is demand for space amongst retailers – either those who are not represented in the centre/area or are wishing to improve/complement their existing representation.

- 2.6.3 Retail requirements lists and associated databases have to be treated with a degree of caution and we would never claim that they present a definitive view on requirements. For example, retailers may be tempted into the centre by the availability of the right unit in the right location (particularly given the availability of units in the current economic climate). Furthermore, these databases do not record demand from the independent retail sector. Nevertheless, they do provide an indicator of overall demand amongst retailers for new space and, in doing so, provide a further measure of the perceived strength and attractiveness of the centre
- 2.6.4 From our research, it would appear that around 80 retailers have had requirements for space within Romford. This includes convenience retailers like Sainsbury's Local, Waitrose, Farmfoods, and Budgens and comparison operators including B&M Bargains, Apple Snow, Deichmann Shoes, Foot Solutions, Monsoon Accessorise, Muji to go, Timberland and Zara. There is also very strong demand for service uses and, particularly restaurants – including the likes of Pizza Express, Caffe Concerto, Cafe Nero, Chiquito, Gourmet Burger Kitchen, Subway, Taco bell and Union jacks.
- 2.6.5 This level of demand, particularly in the current economic climate, demonstrates that Romford remains an attractive and vital centre in which retailers continue to seek accommodation.

2.7 **Vacancies**

- 2.7.1 As indicated above, the number of vacant units in Romford has increased since GVA undertook its survey in 2011. On the other hand, the total amount of vacant floorspace in the town centre has declined and remains comparable with the national average.
- 2.7.2 Much of the vacant floorspace is in a number of large units – notably the former TJ Hughes units at 25-29 and 22-54 Market Place. The overall level of vacancy in the centre as a whole remains stable and, given prevailing economic conditions generally, does not lead to any acute cause for concern.

2.8 Retail Rents and Commercial Yields

2.8.1 Retail rents also provide an indication of the potential retail strength of a centre. Although, as GVA also advise, it is also a function of the availability of space in that centre. Moreover reliable rental data for letting deals has become difficult to obtain since the onset of the recession as landlords have become reluctant to publicise the increasingly favourable terms they have been forced to offer.

2.8.2 The data that is available indicate that Zone A rates in Romford have fallen considerably since reaching a peak of £2,260 per sq ft in 2008; they currently stand at around £1,938 per sq ft. In our view, the rent paid "in terms of Zone A" is no longer a particularly accurate measure of a town's performance. Shorter leases with rent often related to turnover makes the overall picture much more complicated and we therefore would question the utility of this measure in such a complicated market.

2.8.3 A further objective comparison of retail performance is provided by an assessment of investment yields. Yield is a measure of property value. It is a ratio of rental income to capital value and is expressed in terms of the open market rent of a property as a percentage of the capital value. In this way, the higher the yield, the lower the rental income is valued and vice versa. Factors which affect yield are complex and need to be interpreted with reference to the circumstances in each individual town. Broadly speaking, however, low yields indicate that a town is considered to be attractive and as a result be more likely to attract investment. Higher yields provide an indication of concern by investors that rental income might grow less rapidly and therefore less secure.

Table 2: Regional Shopping Centre Yields

Shopping Centre	1/10/00	1/4/01	1/10/01	1/4/02	1/10/02	1/4/03	1/1/04	1/7/04	1/1/05	1/7/05	1/1/06	1/7/06	1/1/07	1/7/07	1/1/08	1/7/08
Romford	7.00	7.00	7.0	7.00	7.00	6.00	5.50	5.50	5.50	5.50	5.50	5.00	5.50	6.00	5.50	5.50
Brentwood	6.50	6.50	6.5	7.00	6.75	6.75	7.00	7.00	6.75	6.75	6.25	6.25	6.00	5.50	5.25	5.25
Basildon	7.00	7.00	7.0	7.00	7.00	6.75	6.50	6.50	6.75	6.50	6.50	6.25	6.00	6.00	5.75	6.00
Billericay	7.50	7.50	7.5	7.50	7.25	7.00	7.00	7.00	7.25	7.25	7.00	7.00	7.00	6.75	6.75	7.00
Blue Water	6.00	6.00	6.0	6.00	6.00	6.00	5.50	5.00	5.00	5.00	5.00	5.00	5.25	5.00	5.00	5.00
Chelmsford	5.75	5.50	5.5	5.50	5.50	5.50	5.50	5.50	5.50	5.25	5.00	4.75	4.75	4.75	4.50	4.75
Lakeside	4.75	4.75	5.0	5.50	5.50	5.50	5.50	4.75	4.75	4.75	4.75	4.75	5.00	5.00	4.75	5.00

Source: Valuation Office Agency – Property Market Report July 2008

2.8.4 Table 2 provides a table of yields on prime retail properties in Romford town centre and compares them with other comparable shopping centres nearby using Property Market Report prepared by the Valuation Office in July 2008 - the most recent iteration of the document. It reveals that yields on prime retail properties in Romford have proved resilient in recent times and now compare favourably with centres nearby – still lags marginally behind yields on prime rental properties in Bluewater (5%), Chelmsford (4.75%) and Lakeside (5%). Romford may be seen as a potentially greater risk for investment than those centres but overall continues to perform well. (NB: All this yield information pre-dates the current economic downturn. When more data becomes available it is likely that yields will have softened in all centres and, as a result this yield needs to be treated with considerable caution.)

2.9 **Accessibility**

2.9.1 Romford town centre is highly accessible by all modes of transport, although access by car and availability and cost of car parking is an issue of concern amongst some users. It has a Public Transport Accessibility Level (PTAL) rating of 6.

2.9.2 Romford Station provides links to London Liverpool Street and Shenfield, Southend-on-Sea and Clacton as well as local services to Emerson Park and Upminster. Accessibility will be greatly enhanced with the completion of Cross Rail which will provide through London services and reinforce the town's role as a 'gateway' into Essex and beyond.

2.9.3 The centre is also well served by buses – with over 20 routes passing through the centre and linking it to the Borough's other centres and centres further afield such as Stratford, Dagenham and Ilford as well as Brentwood and Lakeside.

2.9.4 The centre has several large car parks including the following permanent locations:

- The Brewery 1774 spaces;
- The Mall 950 spaces;
- The Liberty 850 spaces;
- Angel Way 320 spaces;
- Romford Shopping Hall 252 spaces;

- Como Street 180 spaces; and
- Slaney Road 100 spaces;

2.9.5 These are supplemented with further parking in the Market Place (160 spaces on Mondays, Tuesdays, Thursdays and Sundays) and the Town Hall (434) on weekends.

2.9.6 In total it is estimate that there are over 4600 spaces (including 10 coach spaces) available in and around the town centre during weekdays, and this increases to over 5,100 available at weekends.

2.9.7 Whilst pedestrian facilities within the centre are very good, access from surrounding areas is constrained by the ring road. The Council is therefore seeking to improve accessibility by walking and cycling through a series of initiatives to 'green the ring'.

2.10 **Town Centre Environmental Quality**

2.10.1 Although the environmental quality of the town centre as a whole is good, there are some variations – particularly between the managed space of covered shopping centres like The Liberty, Mercury Mall and The Brewery and more open areas – notably the Market Square and South Street (although the latter has been improved during the course of the last year). More peripheral areas – notably High Street and Victoria Road – are less attractive and still in need of enhancement.

2.10.2 The Council recognise this and are working on a programme of public realm upgrade to address this issue and, through an active and well-established Town Centre Partnership, is also seeking to further promote and enhance the attractiveness of the centre as a retail and leisure destination.

2.11 **Conclusions on Romford**

2.11.1 Like GVA, we would conclude that Romford demonstrates all the characteristics of a health, vital and viable town centre when considered against recognised key performance indicators. It has a particularly strong comparison goods shopping offer (particularly for fashion) and this is complemented by a good range of convenience goods – although this does not underpin the vitality of the centre as a whole.

2.11.2 Whilst it has not been immune to the effects of the economic downturn, it remains a generally attractive and very popular centre that continues to thrive despite the increased competition it faces from centres nearby, new developments and growth of online retailing.

3. Hornchurch

3.1 Hornchurch is designated a 'Major District Centre' and located approximately 4kms south east of Romford. Retail activity is concentrated along Hornchurch High Street as well as along Billtet Lane, North Street and Station Lane.

3.2 Diversity of Uses

3.2.1 Based on the most recent Experian Good survey there are currently 196 units trading in the centre comprising approximately 36,092 sq metres gross floorspace - the composition of which is shown in **Table 3** below.

Table 3: Uses in Hornchurch Town Centre

Category	Units			Floorspace (sq Metres)		
	Number of Units	%	National Average (%)	Sq m	%	National Average (%)
Convenience	11	5.61	7.98	6,651	18.43	14.36
Comparison	59	30.10	33.05	9,736	26.98	36.55
Service	111	56.63	46.51	17,698	49.04	38.93
Vacant	15	7.65	12.22	2007	5.56	10.16
Total	196	-	-	36,092	-	-

Source: Experian Good Category Report – March 2011 & Chase & Partners Street Survey

3.2.2 The overall picture is one of relative stability. In terms of convenience shopping the number of units is below the national average, although in terms of floorspace it is above the average, largely due to the Sainsbury's store on High Street which essentially anchors the centre. The centre also includes Little Waitrose and Iceland as well as a limited range of smaller independent convenience outlets.

3.2.3 The number of units and amount of comparison floorspace in the centre is below the national average. Although ladies fashion is well represented, the overall comparison goods 'offer' is quite limited and there is an above average representation of charity shops.

3.2.4 The number of units and amount of floorspace in service use is, on other hand, significantly above the national average. The centre has a large leisure as well as food and drink offer (including branded restaurants like Zizzi, Prezzo, ASK, Wildwood, etc) as well as independent restaurants and bars; it is clearly a very popular leisure destination with a vibrant night-time economy.

3.3 Potential for Growth

3.3.1 The capacity for any significant new development in Hornchurch is limited. There are not currently any major proposals for further development in the centre and no permissions for major new development. As GVA has previously advised, the main potential for improvement/enhancement of the centre lies in maintenance of the public realm and improvements where possible rather than substantial new development.

3.4 Retailer Representation and Intentions to Change Representation

3.4.1 Whilst major retailers like Dorothy Perkins/Burton, Boots, Argos, Superdrug are represented in Hornchurch, it is clear that the centre's role is more based on its convenience shopping function as well as its leisure/food and drink offer. Shoppers tend to undertake most of their comparison shopping in the higher order centres like Romford or Lakeside.

3.4.2 Intelligence suggest that demand amongst retailers for new accommodation in Hornchurch is quite limited – including convenience retailers (Aldi, Cook, etc.), a limited number of comparison retailers (Halfords, Lloyds Pharmacy and Poundland) and leisure/ food and drink operators like Cafe Nero and Subway.

3.5 Vacancies

3.5.1 As indicated above, the number of vacant units and amount of vacant floorspace in Hornchurch remains relatively low when compared to the national average. It is no more than the typical 'churn' one might expect in a successful centre and reflects the general strength of Hornchurch as a centre.

3.6 Accessibility

2.11.3 Hornchurch enjoys relatively good accessibility by all modes of transport. It has a Public Transport Accessibility Level (PTAL) rating of 5.

3.6.1 Although not served directly by rail, Hornchurch Underground Station (District Line) is located 1km south of the centre and, approximately 1km to the north, is Emerson Park rail station. The centre is also well served by bus providing links to Romford and other centres in the Borough.

3.6.2 The centre is accessible by car (although the amount of traffic moving along the main High Street does detract from the overall quality and attractiveness of the centre). The main car park is provided alongside the Sainsbury's where works have been undertaken to provide improved links to the centre.

3.7 Town Centre Environmental Quality

3.7.1 Although through traffic does impact on the centre, environmental quality is generally good. The public realm is generally good and well-maintained and is enhanced by the conservation areas in the vicinity of Queens Theatre and Langton Gardens and also St Andrew's Church and associated buildings.

3.8 Conclusions on Hornchurch

3.8.1 Little has changed since GVA undertook their assessment of Hornchurch. The centre demonstrates the characteristics of a health, vital and viable local shopping town centre with a particularly strong leisure 'offer' when considered against recognised key performance indicators.

4. Elm Park

4.1.1 Elm Park is designated as a 'Minor District Centre'; it is located 4kms south of Romford town centre on the A125 between Romford and Rainham.

4.1.2 The core of the centre lies north of Elm Park Underground Station – between it and the roundabout at the junction of The Broadway and Elm Park Avenue. The area south of Station comprises two parades (Station Parade and Tadworth Parade) is an area of secondary shopping with higher vacancy levels than the main part of the centre.

4.1.3 The Parades north of the Underground Station - Broadway Parade, Elm Parade as well as Elm Park Avenue are the focus of the centre.

4.2 Diversity of Uses

4.2.1 Based on our street survey there are currently 115 units trading in the centre - the composition of which is shown in **Table 4** below.

Table 4: Uses in Elm Park Town Centre

Category	Units		
	Number of Units	%	National Average (%)
Convenience	16	13.91	7.98
Comparison	35	30.43	33.05
Service	49	42.61	46.51
Vacant	15	13.04	12.22
Total	196	-	-

Source: Chase & Partners Street Survey

4.2.2 The centre has an above average representation of convenience goods outlets – reflecting its role as a local ‘day to day’ shopping centre. These include a Tesco Express and Co-Op on Elm Park Avenue and a Nisa store on Station Parade. It also has an array of independent convenience retailers including greengrocers, butchers, fishmonger and bakers; in this regard it provides a good range of convenience retailing.

4.2.3 Representation of comparison retailers is, by contrast, below the national average – although this is not uncharacteristic in a centre of this type. The centre provides a reasonably good comparison goods offer for a small local centre of this type and these are complemented with a good range of service outlets – including a array of hotfood takeaways, cafes, dry cleaners, hairdressers, opticians, two banks as well as estate agents and financial/insurance advisors.

4.2.4 There were 15 units vacant at the time of our survey; this is comparable with the national average. Although it is worth noting that these were concentrated in the area south of the Underground Station – which is very much the secondary area of the centre. The level of vacancy in the core of the centre was low.

4.3 **Potential for Growth**

4.3.1 The nature of the centre and its relationship to surrounding housing inhibits redevelopment opportunities. Nonetheless, **Policy SSA3** of the Council's Site Specific Allocations allocated both the Station and Tadworth Parade for redevelopment to provide a mixed use of residential accommodation and retail uses at ground floor level. Were this to come to fruition it would clearly strengthen this part of the centre.

4.4 **Vacancies**

4.4.1 As indicated above, the number of vacant units in Elm park is comparable with the national average but concentrated in the secondary area south of the Underground Station.

4.5 **Accessibility**

4.5.1 Elm Park enjoys relatively good accessibility by all modes of transport. The main centre has a Public Transport Accessibility Level (PTAL) rating of 4.

4.5.2 Elm Park Underground Station (District Line) provides links to central London and beyond. There are also bus services to Romford as well as smaller centre such as Hornchurch, South Hornchurch, Rainham, Colliers Row as well as Lakeside.

4.5.3 The centre is accessible by car (although, like Hornchurch the amount of traffic moving along The Broadway can detract from the overall quality and attractiveness of the centre).

4.6 **Town Centre Environmental Quality**

4.6.1 Although through traffic does impact on the centre, environmental quality in the shopping area north of the Underground Station is generally good. The pavements and public realm is both clean and generally well-maintained.

4.6.2 The area south of the Station is less attractive. Footfall in this secondary area is markedly lower and the two parades are generally less attractive – having a high number of vacant units and hot food takeaways (some of which are not open during the day). The Council's proposals for this area are clearly conceived to regenerate this area, increase footfall and enhance this, currently weaker, part of the centre.

4.7 Conclusions on Elm Park

- 4.7.1 Elm Park demonstrates the characteristics of a generally health, vital and viable neighbourhood shopping centre. It clearly provides an attractive and popular local centre catering for the day to day shopping and service needs of the local area. The proposals for Station and Tadworth Parade – were they to come to fruition – would improve this secondary part of the centre and further enhance its attractiveness as a local shopping centre.

Chase & Partners
November 2012

APPENDIX 6 – IMPACT ASSESSMENT

1. INTRODUCTION

- 1.1 Although there is no requirement to demonstrate need for new retail development, it remains a key consideration to the quantification of retail impact. Accordingly consideration needs to be given to existing consumer behaviour, the performance of existing centres and stores and the extent to which there may be 'leakage' of retail expenditure to stores/centres in other locations further afield.
- 1.2 This Appendix outlines the methodology Chase & Partners has adopted and assumptions we have made in assessing the impact of the proposed Morrisons store at Rom Valley Way having regard to the various impact criteria set out in prevailing policy (as outlined in Section 3). The relationship between this assessment and the extent to which it demonstrates the proposal's compliance with prevailing policy is discussed in detail in Section 5.
- 1.3 This assessment has been undertaken in accordance with the Good Practice Guidance¹ which, in Annex B, outlines the recommended approach to assessing retail capacity. We have used the same population and expenditure figures that the Council's consultants, GVA, used in preparing the Retail and Commercial Leisure Needs Assessment earlier this year.
- 1.4 Our Assessment comprises a series of tables which are included in **Appendix 8** and are explained below.
- 1.5 The assessment has been undertaken on the basis of a design year of 2014. This assumes planning permission is granted early 2013 with an opening in late 2013/early 2014. In accordance with prevailing guidance we have then considered the potential impact of the proposal 5 years after opening (i.e. 2019).

¹ Planning for Town Centres: Practice Guidance on Need, Impact and the Sequential Approach
DCLG December 2009

2. Study Area

2.1 Chase & Partners has adopted the same Study Area as that used by GVA on the basis that reflects the potential catchment of the proposed foodstore at Rom Valley Way and from which we anticipate it will draw the overwhelming majority of its trade. For ease of reference we have reproduced the GVA Study Area used in this assessment in **Appendix 8**. As explained in Section 5 below, we have assumed that 98.5% of the proposed turnover will be drawn from this area – with 80% of the store’s trade from zones 1-4.

3. Household Survey

3.1 With the agreement of the Council, Chase & Partners has also used the results of the household survey commissioned by GVA and used to prepare the Retail and Commercial Leisure Needs Assessment as a basis for our assessment. This survey provides up-to-date evidence of existing shopping patterns in the Borough and, as well as informing the GVA Study, provides an entirely objective and robust data source for our assessment of the possible retail impact of the proposed store.

4. Population and Expenditure

4.1 In order to ensure consistency with the GVA Assessment, Chase & Partners has used the same data on existing population and forecasted future change – see **Table1**.

4.2 We have also employed the same local area consumer expenditure estimates as GVA. These were provided on a postcode basis by Experian on a 2010 price base.

4.3 However, since the GVA Study was produced in July 2012, Experian has issued a new Retail Planner Briefing Note (No 10 - September 2012). This provides the latest estimates of future expenditure growth - taking into account prevailing economic conditions and future economic outlook and also the latest estimates of future growth in non-store (mainly internet) trading.

4.4 Chase & Partners has therefore used these more recent expenditure growth estimates to produce revised estimates of future available expenditure – for both convenience and comparison goods – see **Tables 2a(i) and 2b(i)**.

- 4.5 In keeping with GVA's approach we have then made an allowance for 'Special Forms of Trading' (SFT) or 'non-store spending' – predominantly online retailing – using the figures contained in the latest Retail Planner Briefing Note - see **Tables 2a(ii) and 2b(ii)**.
- 4.6 By then combining the Study Area zones' population with the corresponding consumer expenditure forecasts and latest estimates of SFT we derive an up-to-date estimate of the expenditure available within the individual zones and Study Area as a whole. The results of this calculation are set out in **Tables 3a and 3b**. (It should perhaps be noted that this point that Chase & Partners' usage of these more recent expenditure forecasts and SFT estimates mean our estimates of future expenditure vary from those found in the GVA Assessment.)

Turnover of Existing Facilities

- 4.7 By utilising the results of the household survey (see **Tables 4A and 4B**), an estimate of the potential turnover of the identified centres and specific stores can then be calculated. This exercise has been undertaken for both convenience shopping (**Table 5a**) and comparison shopping (**Table 6a**). (Again, it should be noted that the fact that estimates of available expenditure have changed from those used by GVA means that although the survey data remains common our estimates of turnover for individual stores and designated centres vary from those found Retail and Commercial Leisure Needs Assessment.)
- 4.8 The exercise has then been forecast for both the design year (2014) (**Tables 5b and 6b**) and five years beyond – See **Tables 5c and 6c**.

5. Turnover of Proposed Floorspace

- 5.1 **Table 7** then sets out Chase & Partners estimate of the turnover of the proposed store at Rom Valley Way. The proposed store's total sales floor space will amount to 4,555 sq metres with a net sales area² of 3,760 sq metres.

² Defined in accordance with the Competition Commission definition as set out in Appendix A of the Good Practice Guidance on Need Impact and the Sequential approach accompanying PPS4 – namely:
"the sales area within a building (i.e. all internal areas accessible to the customer), but excluding checkouts, lobbies, concessions, restaurants, customer toilets and walkways behind the checkouts."

- 5.2 The proposed store will be predominantly sell convenience goods, although an element of the floorspace will be used for the sales of comparison goods that are typically purchased on the main weekly food shop. Based on the occupier's proposed store layout it is assumed for the purposes of this assessment that 3,008 sq metres of the proposed net sales area would be used for convenience goods and 752 sq metres will be used for comparison goods.
- 5.3 Based on Morrisons current sales densities it is estimated that the proposed store could be expected to achieve a total turnover of around £40.20m – comprising £36.06m on convenience goods and £4.14m of comparison goods – see **Table 7a**.
- 5.4 We have then estimated the likely trade draw of the store from each of the zones on the Study Area. In this instance we envisage that almost all the trade would be derived from this area (with just 1.5% from beyond) – see **Table 7b**. Around 80% of the store's trade would be drawn from the four Zones 1-4.

6. Convenience Impact

- 6.1 **Table 8** then calculates the potential convenience impact of the proposed store in 2014 – taking into account the turnover of existing stores in the area, the growth in convenience expenditure that is anticipated to take place between now and then as well as our estimate of the likely trade draw of the store at Rom Valley Way.
- 6.2 In undertaking our assessment we have had regard to the generally-acknowledged principle that large foodstores of the type proposed tend to largely compete on a 'like-for-like' basis for main food shopping trips. These patterns of trading and competition amongst foodstores are widely recognised in the prevailing Good Practice Guidance.
- 6.3 On this basis it is estimated that the proposed store at Rom Valley Way is therefore likely to draw most of its trade from the existing network of large foodstores already trading in, and around, Romford. These include the Asda store at Dolphin Approach and the Sainsbury's store at The Brewery site in Romford town centre, the Sainsbury's store in Hornchurch, as well as the array of out-of-centre stores such as those operated by Tesco at Gallows Corner, Hornchurch Road and Airfield Way – see **Table 8a**.

- 6.4 The proposed store at Rom Valley Way is expected to compete with the existing large foodstores in Romford town centre – notably the Asda store at Dolphin Approach and the Sainsbury’s store at The Brewery site. We estimate that the proposed store will have an impact of around 11% (or £4.27m) on the former and 18% (or £3.79m) on the latter in 2019. This impact is not envisaged to undermine either the continued viability of these stores or the wider health and vitality of Romford town centre as whole (see below).
- 6.5 The effect on other large foodstores in nearby town centres is more modest; it is estimated that the proposed store will have an impact of around 9% (or £3.8m) on the existing Sainsbury’s in Hornchurch and less than 3% (or £0.37m) on the Waitrose in Upminster. Impact on other town centre stores in the vicinity is negligible.
- 6.6 The proposed store at Rom Valley Way will, of course, compete most directly with other large ‘out-of-centre’ stores; indeed it is estimated that the proposed store at Rom Valley Way will have the greatest commercial impact on these stores. It is estimated that the proposed store will have an impact of around 17% on the Tesco at Hornchurch Road, 19% on the Tesco at Airfield Way and 6% on the Tesco at Gallows Corner.
- 6.7 On the basis that all these stores are in ‘out-of-centre’ locations, they are not afforded any protection in prevailing retail policy. Moreover they are all highly successful stores whose future commercial viability is unlikely to be materially affected by the proposals at Rom Valley Way.

7. Comparison Impact

- 7.1 The proposed comparison element of the store is likely to achieve a total comparison turnover of £4.14m – see **Table 7**. This is a very modest figure – particularly when compared with the total level of comparison expenditure currently available in the study area.
- 7.2 It amounts to just 0.4% of the total comparison expenditure available in the study area in 2014, and just over 1% of the total comparison turnover of Romford town centre at the present time.
- 7.3 It is important to note that the comparison goods ‘offer’ in the proposed store will be predominantly be aimed at incidental purchases made when food shopping. As a result the majority of the comparison turnover at the Rom Valley Way store will

most likely be derived from those customers already making comparison purchases when undertaking their main food shopping - in existing the large foodstores in Romford town centre or nearby. Consequently, the comparison effect is more likely to be on the large foodstores like Asda and Sainsbury's in Romford town centre - rather than other comparison retailers in the centre. On this basis, the comparison element of the proposed store will little discernable effect on comparison retailing more generally in Romford town centre and would is certainly not of an order to affect the vitality and viability of the town centre as a whole.

8. Combined Impact

- 8.1 The collective effect of both the convenience and comparison elements of the proposal is summarised in **Table 10**. This demonstrates the total impact of the development at Rom Valley Way on Romford and other, nearby town centres.
- 8.2 Whilst it is not disputed that the direct impact of the development on the convenience sales of certain stores in Romford (and other) town centres may be considerable, the overall effect of the proposal on the total turnover of Romford and other nearby town centres would be much less.
- 8.3 In the case of Romford the total impact of the Rom Valley Way store would be less than 3%. This cannot be considered to be 'significantly adverse impact', and indeed, makes no allowance for the potential commercial enhancement of town centre that might be expected to arise as a result of the development proposed by LB Havering at Mercury Gardens.
- 8.4 The total effect of the proposal on Hornchurch (4.4%) and Elm Park (at 4%) is estimated to be marginally higher than that on Romford; this is largely due to the fact that convenience retailing is a more significant element of the total turnover of both these centres than at Romford. The effect on other centres would be almost imperceptible. None of these levels of impact could be considered to constitute the sort of 'significantly adverse impact' that would justify refusal under prevailing policy.



Household Survey Area and Key Centres

KEY

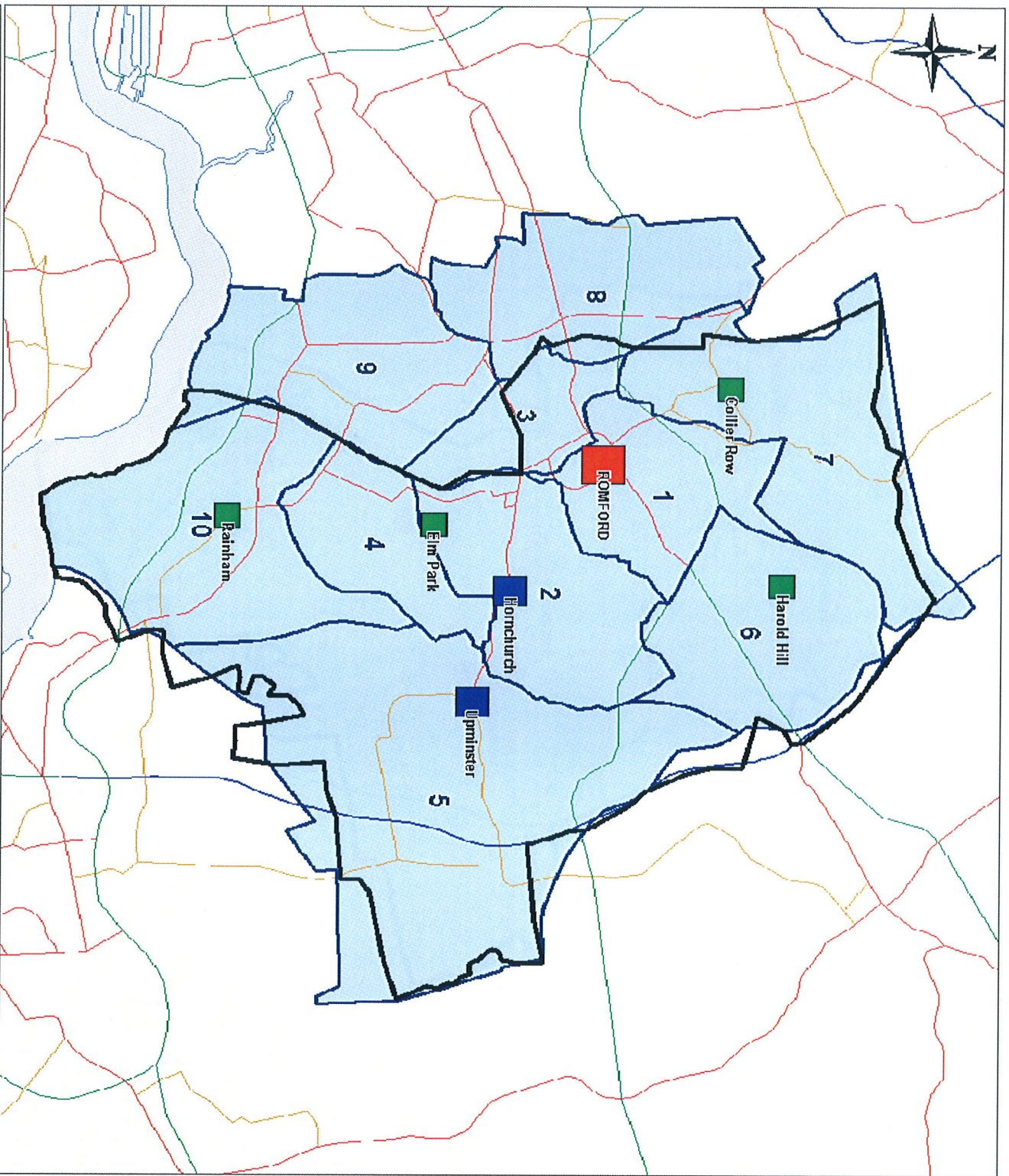
- Havering LA Boundary
- Survey Zone

Zone Postal Sectors

- 1 RM1 1Z/3/4, RM2 5/6, RM7 7
- 2 RM11 1/2/3, RM12 4
- 3 RM7 0/9
- 4 RM12 5/5, RM13 7
- 5 RM14 1/2/3 (Part)
- 6 RM6 0/7/8/9
- 7 RM6 2/3, RM7 8, 3M4 1 (Part)
- 8 RM6 4/5/6, RM8 7/3
- 9 RM5 5/6, RM1 C 7/8/9
- 10 RM13 3/9

- Metropolitan Centre
- Major District Centre
- Minor District Centre

Map reproduced from OS StreetView.
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Havering Retail & Leisure Needs Assessment

Romford - Rom Valley Way

Table 1: Population

Zone	2012	2014	2017	2019	2022
1	39,065	39,374	40,610	40,972	42,419
2	45,217	45,607	47,167	47,554	49,102
3	15,849	16,008	16,645	16,809	17,467
4	27,670	27,855	28,594	28,811	29,680
5	26,367	26,458	26,823	26,940	27,406
6	39,891	40,243	41,652	42,044	43,612
7	27,245	27,479	28,415	28,679	29,737
8	53,546	53,982	55,728	56,165	57,913
9	56,767	57,147	58,666	59,037	60,520
10	19,591	19,785	20,560	20,752	21,520
Total	351,208	353,938	364,860	367,763	379,376

Source: Table 1 of in both Appendix I and II of GVA Retail & Leisure Needs Assessment 2012

Table 2a: Expenditure Per Capita (£) - Convenience Goods (2010 Prices)

(i) All Expenditure

Zone	2012	2014	2017	2019
1	£1,909	£1,909	£1,944	£1,967
2	£2,041	£2,041	£2,078	£2,103
3	£1,766	£1,766	£1,798	£1,820
4	£1,851	£1,851	£1,885	£1,907
5	£1,937	£1,937	£1,972	£1,996
6	£1,794	£1,794	£1,826	£1,848
7	£1,797	£1,797	£1,830	£1,852
8	£1,697	£1,697	£1,728	£1,749
9	£1,671	£1,671	£1,701	£1,722
10	£1,813	£1,813	£1,846	£1,868

(ii) Excluding SFT

Zone	2012	2014	2017	2019
1	£1,779	£1,752	£1,739	£1,731
2	£1,902	£1,874	£1,860	£1,851
3	£1,646	£1,621	£1,609	£1,601
4	£1,725	£1,699	£1,687	£1,678
5	£1,805	£1,778	£1,765	£1,756
6	£1,672	£1,647	£1,635	£1,627
7	£1,675	£1,650	£1,637	£1,629
8	£1,582	£1,558	£1,546	£1,539
9	£1,557	£1,534	£1,523	£1,515
10	£1,690	£1,664	£1,652	£1,644

Table 2b: Expenditure Per Capita (£) - Comparison Goods (2010 Prices)

Zone	2012	2014	2017	2019
1	£3,116	£3,248	£3,539	£3,747
2	£3,379	£3,522	£3,838	£4,064
3	£2,747	£2,864	£3,120	£3,304
4	£2,926	£3,050	£3,323	£3,519
5	£3,153	£3,287	£3,581	£3,792
6	£2,568	£2,677	£2,917	£3,088
7	£2,767	£2,884	£3,143	£3,328
8	£2,366	£2,466	£2,687	£2,845
9	£2,196	£2,289	£2,494	£2,641
10	£2,768	£2,885	£3,144	£3,329

Zone	2012	2014	2017	2019
1	£2,705	£2,751	£2,895	£3,002
2	£2,933	£2,983	£3,139	£3,255
3	£2,384	£2,425	£2,552	£2,646
4	£2,540	£2,583	£2,718	£2,819
5	£2,737	£2,784	£2,929	£3,037
6	£2,229	£2,267	£2,386	£2,474
7	£2,402	£2,443	£2,571	£2,665
8	£2,054	£2,089	£2,198	£2,279
9	£1,906	£1,939	£2,040	£2,115
10	£2,403	£2,444	£2,572	£2,666

Source: Table 2 in Appendix I and Table 2 of Appendix II of GVA Retail & Leisure Needs Assessment 2012
Retail Planner Briefing Note 10.1 - Sept 2012

Growth Rates based on those shown in Table 1a of Retail Planner Briefing Note 10.1

For convenience goods a growth rate of -0.1% to 2013, 0.0% to 2014, 0.6% from 2015 to 2019 has been applied.

For comparison goods a growth rate of 1.8% to 2013, 2.4% to 2014, and 2.9% thereafter has been applied.

Rates for Non Store Retail Sales (SFT) based on Appendix 3 of Retail Planner Briefing Note

Table 3a: Total Convenience Goods Expenditure Available (£m) less SFT

Zone	2012	2014	2017	2019
1	£69.50	£69.00	£70.64	£70.92
2	£86.01	£85.45	£87.72	£88.00
3	£26.09	£25.95	£26.78	£26.92
4	£47.73	£47.33	£48.23	£48.35
5	£47.60	£47.05	£47.34	£47.31
6	£66.70	£66.28	£68.09	£68.39
7	£45.63	£45.33	£46.53	£46.73
8	£84.69	£84.10	£86.17	£86.42
9	£88.41	£87.66	£89.33	£89.45
10	£33.10	£32.93	£33.97	£34.11
Total	£595.46	£591.08	£604.80	£606.61
Growth from 2012 (£m)		-£4.39	£9.33	£11.15

Source: Table 3 in Appendix I of GVA Retail & Leisure Needs Assessment 2012
Retail Planner Briefing Note 10.

Table 3b: Total Comparison Goods Expenditure (£m) less SFT

	2012	2014	2017	2019
1	£105.66	£108.33	£117.56	£122.98
2	£132.62	£136.07	£148.07	£154.79
3	£37.79	£38.83	£42.48	£44.48
4	£70.28	£71.96	£77.73	£81.21
5	£72.16	£73.66	£78.57	£81.82
6	£88.92	£91.25	£99.38	£104.01
7	£65.44	£67.13	£73.05	£76.44
8	£109.97	£112.77	£122.50	£128.01
9	£108.21	£110.80	£119.69	£124.89
10	£47.07	£48.35	£52.87	£55.33
Total	£838.10	£859.15	£931.91	£973.95
Growth from 2012 (£m)		£21.05	£93.81	£135.85

Source: Table 3 in Appendix II of GVA Retail & Leisure Needs Assessment 2012
Retail Planner Briefing Note 10.

Table 4A: Convenience Market Share 2012

	1	2	3	4	5	6	7	8	9	10
Romford Town Centre										
Asda, Dolphin Approach Romford	20.0%	4.6%	11.7%	1.6%	0.4%	7.5%	11.7%	2.9%	2.2%	0.7%
Sainsbury's, The Brewery	12.5%	1.5%	22.4%	1.4%	0.0%	1.1%	4.6%	0.0%	1.8%	0.0%
Other Romford Town Centre	9.3%	0.7%	6.1%	1.1%	0.0%	0.8%	4.8%	3.6%	0.4%	0.7%
Hornchurch Town Centre										
Sainsbury's Hornchurch	3.3%	22.6%	2.6%	17.1%	12.2%	2.6%	0.7%	1.1%	0.7%	2.5%
Other Hornchurch	0.0%	7.9%	0.0%	8.7%	0.4%	0.0%	0.0%	0.0%	0.0%	0.4%
Upminster District Centre										
Waitrose, Upminster District Centre	0.7%	0.7%	0.7%	0.7%	22.5%	0.0%	0.0%	0.0%	0.0%	0.7%
Other, Upminster District Centre	0.4%	2.5%	0.0%	0.4%	28.7%	0.7%	0.4%	0.0%	0.0%	1.7%
Rainham District Centre										
	0.7%	0.7%	0.0%	17.4%	1.9%	1.1%	0.0%	0.0%	9.2%	73.9%
Harold Hill District Centre										
	0.4%	0.0%	0.0%	0.0%	0.0%	20.0%	2.3%	0.0%	0.0%	0.0%
Collier Row District Centre										
	3.4%	0.0%	0.4%	0.0%	0.0%	0.0%	31.4%	0.7%	0.0%	0.0%
Elm Park District Centre										
	0.0%	3.6%	0.0%	3.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%
Out-of-centre Stores										
Tesco, Airfield Way	0.0%	5.1%	0.0%	27.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Tesco Hornchurch Road	9.7%	32.4%	23.5%	10.0%	2.7%	0.0%	1.5%	0.7%	4.0%	0.4%
Tesco Gallows Corner	23.2%	8.3%	5.5%	2.1%	10.3%	50.3%	23.6%	1.4%	3.3%	0.7%
Aldi, Marlborough Road	3.0%	0.0%	0.0%	0.0%	0.0%	2.9%	6.2%	0.0%	0.0%	0.0%
Asda, Marriellands Crescent Dagenham	0.0%	0.0%	0.7%	2.5%	0.0%	0.0%	0.0%	5.3%	31.1%	5.8%
Sainsbury's High Road Chadwell Heath	1.8%	0.0%	4.4%	0.0%	0.0%	0.0%	2.2%	29.7%	4.0%	0.0%
Tesco, High Road, Goodmayes	1.1%	0.7%	1.5%	1.1%	0.8%	0.0%	0.0%	19.1%	2.9%	0.0%
Morrisons, Beacontree Hill, Dagenham	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.5%	11.1%	10.6%	0.0%
Other	10.4%	8.7%	20.5%	5.7%	20.2%	13.0%	9.0%	24.5%	29.7%	11.9%
Total	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%

Source: Table 4 in Appendix I of GVA Retail & Leisure Needs Assessment 2012

Table 4b: Comparison Market Share 2012

	1	2	3	4	5	6	7	8	9	10
Romford Town Centre	52.8%	30.1%	56.1%	28.4%	10.7%	35.5%	52.1%	43.5%	34.2%	21.0%
Hornchurch Town Centre	1.6%	10.4%	1.3%	8.8%	6.5%	2.2%	1.6%	0.0%	0.0%	4.4%
Upminster District Centre	1.4%	1.1%	1.4%	0.7%	21.3%	0.8%	1.2%	0.4%	0.8%	1.1%
Rainham District Centre	0.0%	0.0%	0.0%	0.5%	0.1%	0.0%	0.0%	0.0%	1.6%	5.1%
Harold Hill District Centre	0.4%	0.4%	0.0%	0.0%	0.0%	1.1%	1.2%	0.0%	0.0%	0.0%
Collier Row District Centre						0.0%	1.1%			
Elm Park District Centre	0.0%	0.2%	0.0%	0.3%	0.2%	0.0%	0.0%	0.0%	0.1%	0.0%
Out-of-centre										
Gallows Corner Retail Park	17.8%	10.2%	10.5%	3.9%	6.4%	25.8%	13.2%	7.5%	5.9%	1.0%
Roneo Corner / Rom Valley Way	3.6%	5.9%	8.8%	7.2%	3.3%	0.8%	3.2%	5.0%	3.2%	2.3%
Eastern Avenue Retail Park	1.5%	1.1%	2.8%	0.4%	0.0%	0.5%	8.5%	1.1%	1.0%	0.1%
Destinations Elsewhere										
Lakeside	5.0%	29.3%	6.7%	34.8%	40.9%	17.6%	7.9%	12.3%	21.2%	52.3%
Dagenham	0.0%	0.2%	0.3%	0.2%	0.0%	0.0%	0.4%	3.3%	13.8%	1.3%
Merrilands Retail Park, Dagenham	0.0%	0.0%	0.0%	0.3%	0.0%	0.0%	0.0%	0.3%	3.1%	0.6%
Central London	1.1%	0.5%	2.0%	1.0%	2.2%	0.7%	0.7%	1.8%	1.6%	1.8%
Bluewater	3.0%	1.0%	1.1%	2.3%	1.8%	1.6%	0.0%	0.8%	0.3%	0.5%
Ilford	0.0%	0.0%	0.0%	0.0%	0.2%	0.6%	0.0%	3.5%	0.7%	0.2%
Other	11.9%	9.5%	9.0%	11.3%	6.4%	12.7%	8.9%	20.5%	12.5%	8.4%
	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%

Source: Table 4 in Appendix JI of GVA Retail & Leisure Needs Assessment 2012

Table 5a: Convenience Turnover 2012 (£000)

	1	2	3	4	5	6	7	8	9	10	Total
Romford Town Centre											
Asda, Dolphin Approach Romford	£13.90	£3.96	£3.05	£0.76	£0.19	£5.00	£5.34	£2.46	£1.94	£0.23	£36.84
Sainsburys, The Brewery	£8.69	£1.29	£5.84	£0.67	£0.00	£0.73	£2.10	£0.00	£1.59	£0.00	£20.91
Other Romford Town Centre	£6.46	£0.60	£1.59	£0.53	£0.00	£0.53	£2.19	£3.05	£0.35	£0.23	£15.54
Hornchurch Town Centre											
Sainsbury's Hornchurch	£2.29	£19.44	£0.68	£8.16	£5.81	£1.73	£0.32	£0.93	£0.62	£0.83	£40.81
Other Hornchurch	£0.00	£6.79	£0.00	£4.15	£0.19	£0.00	£0.00	£0.00	£0.00	£0.13	£11.27
Uxminster District Centre											
Waitrose, Uxminster District Centre	£0.49	£0.60	£0.18	£0.33	£10.71	£0.00	£0.00	£0.00	£0.00	£0.23	£12.55
Other, Uxminster District Centre	£0.28	£2.15	£0.00	£0.19	£13.66	£0.47	£0.18	£0.00	£0.00	£0.56	£17.49
Rainham District Centre											
	£0.49	£0.60	£0.00	£8.31	£0.90	£0.73	£0.00	£0.00	£8.13	£24.46	£43.63
Harold Hill District Centre											
	£0.28	£0.00	£0.00	£0.00	£0.00	£13.34	£1.05	£0.00	£0.00	£0.00	£14.67
Collier Row District Centre											
	£2.36	£0.00	£0.10	£0.00	£0.00	£0.00	£14.33	£0.59	£0.00	£0.00	£17.39
Elm Park District Centre											
	£0.00	£3.10	£0.00	£1.43	£0.00	£0.00	£0.00	£0.00	£0.00	£0.13	£4.66
Out-of-centre Stores											
Tesco, Airfield Way	£0.00	£4.39	£0.00	£12.94	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£17.32
Tesco Hornchurch Road	£6.74	£27.87	£6.13	£4.77	£1.29	£0.00	£0.68	£0.59	£3.54	£0.13	£51.74
Tesco Gallows Corner	£16.12	£7.14	£1.43	£1.00	£4.90	£33.55	£10.77	£1.19	£2.92	£0.23	£79.26
Aldi, Marlborough Road	£2.09	£0.00	£0.00	£0.00	£0.00	£1.93	£2.83	£0.00	£0.00	£0.00	£6.85
Asda, Murrilands Crescent Dagenham	£0.00	£0.00	£0.18	£1.19	£0.00	£0.00	£0.00	£4.49	£27.49	£1.92	£35.28
Sainsbury's High Road Chadwell Heath	£1.25	£0.00	£1.15	£0.00	£0.00	£0.00	£1.00	£25.15	£3.54	£0.00	£32.09
Tesco, High Road, Goodmayes	£0.76	£0.60	£0.39	£0.53	£0.38	£0.00	£0.00	£16.18	£2.56	£0.00	£21.40
Morrisons, Beacontree Hill, Dagenham	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.68	£9.40	£9.37	£0.00	£19.46
Other	£7.30	£7.48	£5.35	£2.77	£9.57	£8.67	£4.15	£20.66	£26.35	£4.01	£96.30
Total	£69.50	£ 86.01	£ 26.09	£ 47.73	£ 47.60	£ 66.70	£ 45.63	£ 84.69	£ 88.41	£ 33.10	£595.46

Table 5b: Convenience Turnover 2014 (£000)

	1	2	3	4	5	6	7	8	9	10	Total
Romford Town Centre											
Asda, Dolbin Approach Romford	£13.80	£3.96	£3.05	£0.76	£0.19	£5.00	£5.34	£2.46	£1.94	£0.23	£36.74
Sainsburys, The Brewery	£8.63	£1.29	£5.84	£0.67	£0.00	£0.73	£2.10	£0.00	£1.59	£0.00	£20.85
Other Romford Town Centre	£6.42	£0.60	£1.59	£0.53	£0.00	£0.53	£2.19	£3.05	£0.35	£0.23	£15.49
Hornchurch Town Centre											
Sainsbury's Hornchurch	£2.28	£19.44	£0.68	£8.16	£5.81	£1.73	£0.32	£0.93	£0.62	£0.83	£40.80
Other Hornchurch	£0.00	£6.79	£0.00	£4.15	£0.19	£0.00	£0.00	£0.00	£0.00	£0.13	£11.27
Upminster District Centre											
Waitrose, Upminster District Centre	£0.48	£0.60	£0.18	£0.33	£10.71	£0.00	£0.00	£0.00	£0.00	£0.23	£12.54
Other, Upminster District Centre	£0.28	£2.15	£0.00	£0.19	£13.66	£0.47	£0.18	£0.00	£0.00	£0.56	£17.49
Rainham District Centre											
	£0.48	£0.60	£0.00	£8.31	£0.90	£0.73	£0.00	£0.00	£8.13	£24.46	£43.63
Harold Hill District Centre											
	£0.28	£0.00	£0.00	£0.00	£0.00	£13.34	£1.05	£0.00	£0.00	£0.00	£14.67
Collier Row District Centre											
	£2.35	£0.00	£0.10	£0.00	£0.00	£0.00	£14.33	£0.59	£0.00	£0.00	£17.37
Elm Park District Centre											
	£0.00	£3.10	£0.00	£1.43	£0.00	£0.00	£0.00	£0.00	£0.00	£0.13	£4.66
Out-of-centre Stores											
Tesco, Airfield Way	£0.00	£4.39	£0.00	£12.94	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£17.32
Tesco Hornchurch Road	£6.69	£27.87	£6.13	£4.77	£1.29	£0.68	£0.68	£0.59	£3.54	£0.13	£51.70
Tesco Gallows Corner	£16.01	£7.14	£1.43	£1.00	£4.90	£33.55	£10.77	£1.19	£2.92	£0.23	£79.14
Aldi, Mariborough Road	£2.07	£0.00	£0.00	£0.00	£0.00	£1.93	£2.83	£0.00	£0.00	£0.00	£6.83
Asda, Marriellands Crescent Dagenham	£0.00	£0.00	£0.18	£1.19	£0.00	£0.00	£0.00	£4.49	£27.49	£1.92	£35.28
Sainsbury's High Road Chadwell Heath	£1.24	£0.00	£1.15	£0.00	£0.00	£1.00	£1.00	£25.15	£3.54	£0.00	£32.08
Tesco, High Road, Goodnaves	£0.76	£0.60	£0.39	£0.53	£0.38	£0.00	£0.00	£16.18	£2.56	£0.00	£21.40
Morrisons, Beacontree Hill, Dagenham	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.68	£9.40	£9.37	£0.00	£19.46
Other	£7.25	£6.92	£5.21	£2.37	£9.01	£8.25	£3.85	£20.07	£25.60	£3.83	£92.36
Total	£69.00	£ 85.45	£ 25.95	£ 47.33	£ 47.05	£ 66.28	£ 45.33	£ 84.10	£ 87.66	£ 32.93	£591.08

Table 5c: Convenience Turnover 2019 (£000)

	1	2	3	4	5	6	7	8	9	10	Total
Romford Town Centre											
Asda, Dolbin Approach Romford	£14.18	£4.05	£3.15	£0.77	£0.19	£5.13	£5.47	£2.51	£1.97	£0.24	£37.65
Sainsbury's, The Brewery	£8.86	£1.32	£6.03	£0.68	£0.00	£0.75	£2.15	£0.00	£1.61	£0.00	£21.40
Other Romford Town Centre	£6.60	£0.62	£1.64	£0.53	£0.00	£0.55	£2.24	£3.11	£0.36	£0.24	£15.88
Hornchurch Town Centre											
Sainsbury's Hornchurch	£2.34	£19.89	£0.70	£8.27	£5.77	£1.78	£0.33	£0.95	£0.63	£0.85	£41.50
Other Hornchurch	£0.00	£6.95	£0.00	£4.21	£0.19	£0.00	£0.00	£0.00	£0.00	£0.14	£11.48
Upminster District Centre											
Waitrose, Upminster District Centre	£0.50	£0.62	£0.19	£0.34	£10.65	£0.00	£0.00	£0.00	£0.00	£0.24	£12.52
Other, Upminster District Centre	£0.28	£2.20	£0.00	£0.19	£13.58	£0.48	£0.19	£0.00	£0.00	£0.58	£17.50
Rainham District Centre											
	£0.50	£0.62	£0.00	£8.41	£0.90	£0.75	£0.00	£0.00	£8.23	£25.21	£44.62
Harold Hill District Centre											
	£0.28	£0.00	£0.00	£0.00	£0.00	£13.68	£1.07	£0.00	£0.00	£0.00	£15.04
Collier Row District Centre											
	£2.41	£0.00	£0.11	£0.00	£0.00	£0.00	£14.67	£0.60	£0.00	£0.00	£17.80
Elm Park District Centre											
	£0.00	£3.17	£0.00	£1.45	£0.00	£0.00	£0.00	£0.00	£0.00	£0.14	£4.76
Out-of-centre Stores											
Tesco, Airfield Way	£0.00	£4.49	£0.00	£13.10	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£17.59
Tesco Hornchurch Road	£6.88	£28.51	£6.33	£4.84	£1.28	£0.00	£0.70	£0.60	£3.58	£0.14	£52.85
Tesco Gallows Corner	£16.45	£7.30	£1.48	£1.02	£4.87	£34.40	£11.03	£1.21	£2.95	£0.24	£80.96
Aldi, Mariborough Road	£2.13	£0.00	£0.00	£0.00	£0.00	£1.98	£2.90	£0.00	£0.00	£0.00	£7.01
Asda, Marrilands Crescent Daqenham	£0.00	£0.00	£0.19	£1.21	£0.00	£0.00	£0.00	£4.58	£27.82	£1.98	£35.77
Sainsbury's High Road Chadwell Heath	£1.28	£0.00	£1.18	£0.00	£0.00	£0.00	£1.03	£25.67	£3.58	£0.00	£32.73
Tesco, High Road, Goodmaves	£0.78	£0.62	£0.40	£0.53	£0.38	£0.00	£0.00	£16.51	£2.59	£0.00	£21.81
Morrisons, Beacontree Hill, Daqenham	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.70	£9.59	£9.48	£0.00	£19.78
Other	£7.45	£7.66	£5.52	£2.80	£9.51	£8.89	£4.25	£21.09	£26.66	£4.13	£97.95
Total	£70.92	£88.00	£26.92	£48.35	£47.31	£68.39	£46.73	£86.42	£89.45	£34.11	£606.61

Table 6a: Comparison Turnover 2012 (£000)

	1	2	3	4	5	6	7	8	9	10	Total
Romford Town Centre	£55.79	£39.92	£21.20	£19.96	£7.72	£31.57	£34.09	£47.84	£37.01	£9.88	£304.97
Hornchurch Town Centre	£1.69	£13.79	£0.49	£6.18	£4.69	£1.96	£1.05	£0.00	£0.00	£2.07	£31.92
Upminster District Centre	£1.48	£1.46	£0.53	£0.49	£15.37	£0.71	£0.79	£0.44	£0.87	£0.52	£22.65
Rainham District Centre	£0.00	£0.00	£0.00	£0.35	£0.07	£0.00	£0.00	£0.00	£1.73	£2.40	£4.56
Harold Hill District Centre	£0.42	£0.53	£0.00	£0.00	£0.00	£0.98	£0.79	£0.00	£0.00	£0.00	£2.72
Collier Row District Centre	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.72	£0.00	£0.00	£0.00	£0.72
Elm Park District Centre	£0.00	£0.27	£0.00	£0.21	£0.14	£0.00	£0.00	£0.00	£0.11	£0.00	£0.73
Out-of-centre											
Gallows Corner Retail Park	£18.81	£13.53	£3.97	£2.74	£4.62	£22.94	£8.64	£8.25	£6.38	£0.47	£90.34
Roneo Corner / Rom Valley Way	£3.80	£7.82	£3.33	£5.06	£2.38	£0.71	£2.09	£5.50	£3.46	£1.08	£35.24
Eastern Avenue Retail Park	£1.58	£1.46	£1.06	£0.28	£0.00	£0.44	£5.56	£1.21	£1.08	£0.05	£12.73
Destinations Elsewhere											
Lakeside	£5.28	£38.86	£2.53	£24.46	£29.51	£15.65	£5.17	£13.53	£22.94	£24.62	£182.54
Dagenham	£0.00	£0.27	£0.11	£0.14	£0.00	£0.00	£0.26	£3.63	£14.93	£0.61	£19.95
Merriellands Retail Park, Dagenham	£0.00	£0.00	£0.00	£0.21	£0.00	£0.00	£0.00	£0.33	£3.35	£0.28	£4.18
Central London	£1.16	£0.66	£0.76	£0.70	£1.59	£0.62	£0.46	£1.98	£1.73	£0.85	£10.51
Blueswater	£3.17	£1.33	£0.42	£1.62	£1.30	£1.42	£0.00	£0.88	£0.32	£0.24	£10.69
Ilford	£0.00	£0.00	£0.00	£0.00	£0.14	£0.53	£0.00	£3.85	£0.76	£0.09	£5.38
Other	£12.47	£12.73	£3.40	£7.87	£4.62	£11.38	£5.82	£22.54	£13.53	£3.91	£98.27
	£105.66	£132.62	£37.79	£70.28	£72.16	£88.92	£65.44	£109.97	£108.21	£47.07	£838.10

Table 6b: Comparison Turnover 2014 (£000)

	1	2	3	4	5	6	7	8	9	10	Total
Romford Town Centre	£57.20	£40.96	£21.78	£20.44	£7.88	£32.39	£34.98	£49.06	£37.89	£10.15	£312.73
Hornchurch Town Centre	£1.73	£14.15	£0.50	£6.33	£4.79	£2.01	£1.07	£0.00	£0.00	£2.13	£32.72
Uomminster District Centre	£1.52	£1.50	£0.54	£0.50	£15.69	£0.73	£0.81	£0.45	£0.89	£0.53	£23.15
Rainham District Centre	£0.00	£0.00	£0.00	£0.36	£0.07	£0.00	£0.00	£0.00	£1.77	£2.47	£4.67
Harold Hill District Centre	£0.43	£0.54	£0.00	£0.00	£0.00	£1.00	£0.81	£0.00	£0.00	£0.00	£2.79
Collier Row District Centre	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.74	£0.00	£0.00	£0.00	£0.74
Elm Park District Centre	£0.00	£0.27	£0.00	£0.22	£0.15	£0.00	£0.00	£0.00	£0.11	£0.00	£0.75
Out-of-centre											
Gallows Corner Retail Park	£19.28	£13.88	£4.08	£2.81	£4.71	£23.54	£8.86	£8.46	£6.54	£0.48	£92.64
Roneo Corner / Rom Valley Way	£3.90	£8.03	£3.42	£5.18	£2.43	£0.73	£2.15	£5.64	£3.55	£1.11	£36.13
Eastern Avenue Retail Park	£1.62	£1.50	£1.09	£0.29	£0.00	£0.46	£5.71	£1.24	£1.11	£0.05	£13.06
Destinations Elsewhere											
Lakeside	£5.42	£39.87	£2.60	£25.04	£30.13	£16.06	£5.30	£13.87	£23.49	£25.29	£187.07
Dagenham	£0.00	£0.27	£0.12	£0.14	£0.00	£0.00	£0.27	£3.72	£15.29	£0.63	£20.44
Merrifields Retail Park, Dagenham	£0.00	£0.00	£0.00	£0.22	£0.00	£0.00	£0.00	£0.34	£3.43	£0.29	£4.28
Central London	£1.19	£0.68	£0.78	£0.72	£1.62	£0.64	£0.47	£2.03	£1.77	£0.87	£10.77
Bluwater	£3.25	£1.36	£0.43	£1.66	£1.33	£1.46	£0.00	£0.90	£0.33	£0.24	£10.95
Ilford	£0.00	£0.00	£0.00	£0.00	£0.15	£0.55	£0.00	£3.95	£0.78	£0.10	£5.51
Other	£12.78	£13.06	£3.49	£8.06	£4.71	£11.68	£5.97	£23.12	£13.85	£4.01	£100.75
	£108.33	£136.07	£38.83	£71.96	£73.66	£91.25	£67.13	£112.77	£110.80	£48.35	£859.15

Table 6c: Comparison Turnover 2019 (£000)

	1	2	3	4	5	6	7	8	9	10	Total
Romford Town Centre	£64.93	£46.59	£24.95	£23.06	£8.75	£36.92	£39.83	£55.68	£42.71	£11.62	£355.06
Hornchurch Town Centre	£1.97	£16.10	£0.58	£7.15	£5.32	£2.29	£1.22	£0.00	£0.00	£2.43	£37.05
Uminster District Centre	£1.72	£1.70	£0.62	£0.57	£17.43	£0.83	£0.92	£0.51	£1.00	£0.61	£25.91
Rainham District Centre	£0.00	£0.00	£0.00	£0.41	£0.08	£0.00	£0.00	£0.00	£2.00	£2.82	£5.31
Harold Hill District Centre	£0.49	£0.62	£0.00	£0.00	£0.00	£1.14	£0.92	£0.00	£0.00	£0.00	£3.17
Collier Row District Centre	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.84	£0.00	£0.00	£0.00	£0.84
Elm Park District Centre	£0.00	£0.31	£0.00	£0.24	£0.16	£0.00	£0.00	£0.00	£0.12	£0.00	£0.84
Out-of-centre	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	
Gallows Corner Retail Park	£21.89	£15.79	£4.67	£3.17	£5.24	£26.83	£10.09	£9.60	£7.37	£0.55	£105.20
Roneo Corner / Rom Valley Way	£4.43	£9.13	£3.91	£5.85	£2.70	£0.83	£2.45	£6.40	£4.00	£1.27	£40.97
Eastern Avenue Retail Park	£1.84	£1.70	£1.25	£0.32	£0.00	£0.52	£6.50	£1.41	£1.25	£0.06	£14.85
Destinations Elsewhere	£6.15	£45.35	£2.98	£28.26	£33.47	£18.30	£6.04	£15.75	£26.48	£28.94	£211.71
Lakeside	£0.00	£0.31	£0.13	£0.16	£0.00	£0.00	£0.31	£4.22	£17.23	£0.72	£23.09
Daadenham	£0.00	£0.00	£0.00	£0.24	£0.00	£0.00	£0.00	£0.38	£3.87	£0.33	£4.83
Merrilands Retail Park, Daadenham	£1.35	£0.77	£0.89	£0.81	£1.80	£0.73	£0.54	£2.30	£2.00	£1.00	£12.19
Central London	£3.69	£1.55	£0.49	£1.87	£1.47	£1.66	£0.00	£1.02	£0.37	£0.28	£12.41
Bluewater	£0.00	£0.00	£0.00	£0.00	£0.16	£0.62	£0.00	£4.48	£0.87	£0.11	£6.25
Ilford											
Other	£14.51	£14.86	£4.00	£9.10	£5.24	£13.31	£6.80	£26.24	£15.61	£4.59	£114.27
	£122.98	£154.79	£44.48	£81.21	£81.82	£104.01	£76.44	£128.01	£124.89	£55.33	£973.95

Table 7a: Proposed Store Turnover

	Net	Goods Type/Space	Sales	Total
Proposed Store	3,760	Convenience Comparison	£11,988 £5,500	£36.06 £4.14
				£40.20

Table 7b: Proposed Store - Trade Draw Convenience Goods

	1	2	3	4	5	6	7	8	9	10	Inflow	Total
Trade Draw	25.0%	27.5%	12.5%	15.0%	5.0%	5.0%	2.5%	2.0%	2.0%	2.0%	2.0%	100.0%
Convenience Turnover	£9.01	£9.92	£4.51	£5.41	£1.80	£1.80	£0.90	£0.72	£0.72	£0.72	£0.72	£36.06
Comparison Turnover	£1.03	£1.14	£0.52	£0.62	£0.21	£0.21	£0.10	£0.08	£0.08	£0.08	£0.08	£4.14

Table 8a: Convenience Turnover 2014 - including proposed store (£m)

Proposed Store	1	2	3	4	5	6	7	8	9	10	Inflow	Total £m	Impact £m	Impact (%)
Romford Town Centre	£9.01	£9.92	£4.51	£5.41	£1.80	£1.80	£0.90	£0.72	£0.72	£0.72	£0.54	£36.06		
Asda, Dolbin Approach Romford	£11.05	£3.46	£2.05	£0.76	£0.19	£4.95	£5.34	£2.46	£1.94	£0.23		£32.44	£4.30	11.7%
Sainsbury's, The Brewery	£6.13	£1.29	£4.59	£0.67	£0.00	£0.73	£2.10	£0.00	£1.59	£0.00		£17.10	£3.75	18.0%
Other Romford Town Centre	£5.42	£0.60	£1.59	£0.53	£0.00	£0.53	£2.19	£3.05	£0.35	£0.23		£14.49	£1.00	6.5%
Hornchurch Town Centre	£2.03	£16.94	£0.68	£7.16	£5.56	£1.73	£0.32	£0.93	£0.62	£0.83		£36.80	£4.00	9.8%
Sainsbury's Hornchurch	£0.00	£6.54	£0.00	£4.15	£0.19	£0.00	£0.00	£0.00	£0.00	£0.13		£11.02	£0.25	2.2%
Other Hornchurch														
Uxminster District Centre	£0.48	£0.60	£0.18	£0.33	£10.21	£0.00	£0.00	£0.00	£0.00	£0.23		£12.04	£0.50	4.0%
Waitrose, Uxminster District Centre	£0.28	£2.15	£0.00	£0.19	£13.11	£0.47	£0.18	£0.00	£0.00	£0.56		£16.94	£0.55	3.1%
Other, Uxminster District Centre														
Rainham District Centre	£0.48	£0.60	£0.00	£7.81	£0.90	£0.73	£0.00	£0.00	£8.13	£23.76		£42.43	£1.20	2.8%
Harold Hill District Centre	£0.28	£0.00	£0.00	£0.00	£0.00	£13.09	£1.05	£0.00	£0.00	£0.00		£14.42	£0.25	1.7%
Collier Row District Centre	£2.35	£0.00	£0.10	£0.00	£0.00	£0.00	£13.88	£0.59	£0.00	£0.00		£16.92	£0.45	2.6%
Elm Park District Centre	£0.00	£2.85	£0.00	£1.43	£0.00	£0.00	£0.00	£0.00	£0.00	£0.13		£4.41	£0.25	5.4%
Out-of-centre Stores	£0.00	£3.64	£0.00	£10.29	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00		£13.92	£3.40	19.6%
Tesco, Airfield Way	£5.94	£23.22	£3.88	£3.52	£1.29	£0.00	£0.68	£0.59	£3.54	£0.13		£42.80	£8.90	17.2%
Tesco Hornchurch Road	£14.01	£6.14	£1.43	£1.00	£4.40	£32.05	£10.32	£1.19	£2.92	£0.23		£73.69	£5.45	6.9%
Tesco Gallows Corner	£2.07	£0.00	£0.00	£0.00	£0.00	£1.93	£2.83	£0.00	£0.00	£0.00		£6.83	£0.00	0.0%
Aldi, Marlborough Road	£0.00	£0.00	£0.18	£1.19	£0.00	£0.00	£0.00	£0.00	£26.89	£1.92		£34.68	£0.60	1.7%
Asda, Mairielands Crescent Dagenham	£1.24	£0.00	£1.15	£0.00	£0.00	£0.00	£1.00	£24.80	£3.54	£0.00		£31.73	£0.35	1.1%
Sainsbury's High Road Chadwell Heath	£0.76	£0.60	£0.39	£0.53	£0.38	£0.00	£0.00	£15.98	£2.56	£0.00		£21.20	£0.20	0.9%
Tesco, High Road, Goodmayes	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.68	£9.25	£9.27	£0.00		£19.21	£0.25	1.3%
Morrisons, Beacontree Hill, Dagenham														
Other	£7.48	£6.91	£5.21	£2.36	£9.01	£8.25	£3.85	£20.05	£25.58	£3.81				
	£69.00	£85.45	£25.95	£47.33	£47.05	£66.28	£45.33	£84.10	£87.66	£32.93				

Table 8b: Convenience Turnover 2019 - including proposed store (£m)

	1	2	3	4	5	6	7	8	9	10	Inflow	Total £m	Impact £m	Impact (%)
Proposed Store	£9.71	£10.68	£4.86	£5.83	£1.94	£1.94	£0.97	£0.78	£0.78	£0.78	£0.58	£38.85		
Romford Town Centre														
Asda, Dolphin Approach Romford	£11.36	£3.56	£2.13	£0.78	£0.19	£5.11	£5.50	£2.52	£1.98	£0.24		£33.58	£4.27	11.4%
Sainsbury's, The Brewery	£6.30	£1.33	£4.76	£0.68	£0.00	£0.76	£1.16	£0.00	£1.62	£0.00		£17.62	£3.79	17.7%
Other Romford Town Centre	£5.57	£0.62	£1.65	£0.54	£0.00	£0.55	£2.26	£3.13	£0.36	£0.24		£14.92	£0.97	6.1%
Hornchurch Town Centre														
Sainsbury's Hornchurch	£2.08	£17.44	£0.70	£7.32	£5.59	£1.79	£0.33	£0.96	£0.63	£0.86		£37.70	£3.80	9.2%
Other Hornchurch	£0.00	£6.74	£0.00	£4.24	£0.19	£0.00	£0.00	£0.00	£0.00	£0.14		£11.31	£0.17	1.5%
Uxminster District Centre														
Waitrose, Uxminster District Centre	£0.50	£0.62	£0.19	£0.34	£10.27	£0.00	£0.00	£0.00	£0.00	£0.24		£12.16	£0.37	2.9%
Other, Uxminster District Centre	£0.28	£2.21	£0.00	£0.20	£13.19	£0.48	£0.19	£0.00	£0.00	£0.58		£17.13	£0.37	2.1%
Rainham District Centre														
	£0.50	£0.62	£0.00	£7.97	£0.91	£0.76	£0.00	£0.00	£8.30	£24.62		£43.68	£0.94	2.1%
Harold Hill District Centre														
	£0.28	£0.00	£0.00	£0.00	£0.00	£13.51	£1.08	£0.00	£0.00	£0.00		£14.87	£0.16	1.1%
Collier Row District Centre														
	£2.41	£0.00	£0.11	£0.00	£0.00	£0.00	£14.31	£0.61	£0.00	£0.00		£17.43	£0.36	2.0%
Elm Park District Centre														
	£0.00	£2.93	£0.00	£1.46	£0.00	£0.00	£0.00	£0.00	£0.00	£0.14		£4.53	£0.22	4.7%
Out-of-centre Stores														
Tesco, Airfield Way	£0.00	£3.75	£0.00	£10.51	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00		£14.25	£3.34	19.0%
Tesco Hornchurch Road	£6.11	£23.91	£4.02	£3.60	£1.29	£0.00	£0.71	£0.61	£3.61	£0.14		£44.00	£8.85	16.8%
Tesco Gallows Corner	£14.40	£6.32	£1.49	£1.02	£4.43	£33.07	£10.64	£1.22	£2.98	£0.24		£75.80	£5.15	6.4%
Aldi, Marlborough Road	£2.13	£0.00	£0.00	£0.00	£0.00	£2.00	£2.88	£0.00	£0.00	£0.00		£7.00	£0.01	0.1%
Asda, Marriellands Crescent Dagenham	£0.00	£0.00	£0.19	£1.22	£0.00	£0.00	£0.00	£4.61	£27.44	£1.99		£35.45	£0.32	0.9%
Sainsbury's High Road Chadwell Heath	£1.28	£0.00	£1.19	£0.00	£0.00	£0.00	£1.03	£25.49	£3.61	£0.00		£32.60	£0.14	0.4%
Tesco, High Road, Goodmayes	£0.78	£0.62	£0.41	£0.54	£0.38	£0.00	£0.00	£16.42	£2.62	£0.00		£21.76	£0.05	0.2%
Morrisons, Beacontree Hill, Dagenham	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.71	£9.51	£9.46	£0.00		£19.67	£0.10	0.5%
Other														
	£7.24	£6.64	£5.22	£2.11	£8.93	£8.43	£3.97	£20.57	£26.06	£3.92				
	£70.92	£88.00	£26.92	£48.35	£47.31	£68.39	£46.73	£86.42	£89.45	£34.11				

Table 9a: Comparison Turnover 2014 - including proposed store (£m)

Proposed Store	1	2	3	4	5	6	7	8	9	10	Inflow	Total	Impact (£m)	Impact (%)
Romford Town Centre	£1.03	£1.14	£0.52	£0.62	£0.21	£0.21	£0.10	£0.08	£0.08	£0.08	£0.06	£4.14	£3.09	1.0%
Hornchurch Town Centre	£56.30	£40.11	£21.27	£20.12	£7.78	£32.28	£34.88	£48.98	£37.81	£10.11		£309.64	£0.00	0.0%
Upminster District Centre	£1.73	£14.15	£0.50	£6.33	£4.79	£2.01	£1.07	£0.00	£0.00	£2.13		£32.72	£0.00	0.0%
Rainham District Centre	£1.52	£1.50	£0.54	£0.50	£15.69	£0.73	£0.81	£0.45	£0.89	£0.53		£23.15	£0.00	0.0%
Harold Hill District Centre	£0.00	£0.00	£0.00	£0.36	£0.07	£0.00	£0.00	£0.00	£1.77	£2.47		£4.67	£0.00	0.0%
Collier Row District Centre	£0.43	£0.54	£0.00	£0.00	£0.00	£1.00	£0.81	£0.00	£0.00	£0.00		£2.79	£0.00	0.0%
Elm Park District Centre	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.74	£0.00	£0.00	£0.00		£0.74	£0.00	0.0%
Other	£0.00	£0.27	£0.00	£0.22	£0.15	£0.00	£0.00	£0.00	£0.11	£0.00		£0.75	£0.00	0.0%
Out-of-centre	£19.15	£13.84	£4.08	£2.81	£4.71	£23.44	£8.86	£8.46	£6.54	£0.48		£92.37	£0.27	0.3%
Gallows Corner Retail Park	£3.90	£8.03	£3.42	£5.18	£2.43	£0.73	£2.15	£5.64	£3.55	£1.11		£36.13	£0.00	0.0%
Roneo Corner / Rom Valley Way	£1.62	£1.50	£1.09	£0.29	£0.00	£0.46	£5.71	£1.24	£1.11	£0.05		£13.06	£0.00	0.0%
Eastern Avenue Retail Park														
Destinations Elsewhere	£5.42	£39.62	£2.60	£24.74	£30.03	£16.06	£5.30	£13.87	£23.49	£25.25		£186.38	£0.69	0.4%
Lakeside	£0.00	£0.27	£0.12	£0.14	£0.00	£0.00	£0.27	£3.72	£15.29	£0.63		£20.44	£0.00	0.0%
Daedham	£0.00	£0.00	£0.00	£0.22	£0.00	£0.00	£0.00	£0.34	£3.43	£0.29		£4.28	£0.00	0.0%
Merrifields Retail Park, Daedham	£1.19	£0.68	£0.78	£0.72	£1.82	£0.64	£0.47	£2.03	£1.77	£0.87		£10.77	£0.00	0.0%
Central London	£3.25	£1.36	£0.43	£1.66	£1.33	£1.46	£0.00	£0.90	£0.33	£0.24		£10.95	£0.00	0.0%
Bluewater	£0.00	£0.00	£0.00	£0.00	£0.15	£0.55	£0.00	£3.95	£0.78	£0.10		£5.51	£0.00	0.0%
Ilford														
Other	£12.78	£13.06	£3.49	£8.06	£4.71	£11.68	£5.97	£23.12	£13.85	£4.01				
Total	£108.33	£136.07	£38.83	£71.96	£73.66	£91.25	£67.13	£112.77	£110.80	£48.35				

Table 9b: Comparison Turnover 2019 - including proposed store (£m)

	1	2	3	4	5	6	7	8	9	10	Inflow	Total	Impact £m	Impact (%)
Proposed Store														
Romford Town Centre	£1.11	£1.23	£0.56	£0.67	£0.22	£0.22	£0.11	£0.09	£0.09	£0.09	£0.07	£4.46	£3.51	1.0%
Hornchurch Town Centre	£63.91	£45.62	£24.37	£22.70	£8.64	£36.80	£39.71	£55.59	£42.62	£11.57		£351.55	£0.00	0.0%
Uxminster District Centre	£1.97	£16.10	£0.58	£7.15	£5.32	£2.29	£1.22	£0.00	£0.00	£2.43		£37.05	£0.00	0.0%
Rainham District Centre	£1.72	£1.70	£0.62	£0.57	£17.43	£0.83	£0.92	£0.51	£1.00	£0.61		£25.91	£0.00	0.0%
Harold Hill District Centre	£0.00	£0.00	£0.00	£0.41	£0.08	£0.00	£0.00	£0.00	£2.00	£2.82		£5.31	£0.00	0.0%
Collier Row District Centre	£0.49	£0.62	£0.00	£0.00	£0.00	£1.14	£0.92	£0.00	£0.00	£0.00		£3.17	£0.00	0.0%
Elm Park District Centre	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.84	£0.00	£0.00	£0.00		£0.84	£0.00	0.0%
	£0.00	£0.31	£0.00	£0.24	£0.16	£0.00	£0.00	£0.00	£0.12	£0.00		£0.84	£0.00	0.0%
Out-of-centre														
Gallows Corner Retail Park	£21.74	£15.74	£4.67	£3.17	£5.24	£26.72	£10.09	£9.60	£7.37	£0.55		£104.89	£0.31	0.3%
Roneo Corner / Rom Valley Way	£4.43	£9.13	£3.91	£5.85	£2.70	£0.83	£2.45	£6.40	£4.00	£1.27		£40.97	£0.00	0.0%
Eastern Avenue Retail Park	£1.84	£1.70	£1.25	£0.32	£0.00	£0.52	£6.50	£1.41	£1.25	£0.06		£14.85	£0.00	0.0%
Destinations Elsewhere														
Lakeside	£6.15	£45.07	£2.98	£27.92	£33.35	£18.30	£6.04	£15.75	£26.48	£28.89		£210.93	£0.78	0.4%
Daoenham	£0.00	£0.31	£0.13	£0.16	£0.00	£0.00	£0.31	£4.22	£17.23	£0.72		£23.09	£0.00	0.0%
Merrilelands Retail Park, Daoenham	£0.00	£0.00	£0.00	£0.24	£0.00	£0.00	£0.00	£0.38	£3.87	£0.33		£4.83	£0.00	0.0%
Central London	£1.35	£0.77	£0.89	£0.81	£1.80	£0.73	£0.54	£2.30	£2.00	£1.00		£12.19	£0.00	0.0%
Bluewater	£3.69	£1.55	£0.49	£1.87	£1.47	£1.66	£0.00	£1.02	£0.37	£0.28		£12.41	£0.00	0.0%
Ifford	£0.00	£0.00	£0.00	£0.00	£0.16	£0.62	£0.00	£4.48	£0.87	£0.11		£6.25	£0.00	0.0%
Other	£14.57	£14.93	£4.03	£9.13	£5.24	£13.33	£6.81	£26.24	£15.61	£4.60				
	£122.98	£154.79	£44.48	£81.21	£81.82	£104.01	£76.44	£128.01	£124.89	£55.33				

Table 10: Impact Summary

	Turnover in 2019 excluding store	Turnover in 2019 including Proposed Store (£m)	Trade Diversion (£m)	% Impact
Romford Town Centre				
Convenience Comparison	£74.94 £355.06 £430.00	£65.91 £351.55 £417.46	£9.03 £3.51 £12.54	12.0% 1.0% 2.9%
Total				
Hornchurch Town Centre				
Convenience Comparison	£52.99 £37.05 £90.04	£49.01 £37.05 £86.07	£3.98 £0.00 £3.98	7.5% 0.0% 4.4%
Total				
Upminster District Centre				
Convenience Comparison	£30.03 £25.91 £55.94	£29.29 £25.91 £55.20	£0.74 £0.00 £0.74	2.5% 0.0% 1.3%
Total				
Rainham District Centre				
Convenience Comparison	£44.62 £5.31 £49.92	£43.68 £5.31 £48.98	£0.94 £0.00 £0.94	2.1% 0.0% 1.9%
Total				
Harold Hill District Centre				
Convenience Comparison	£15.04 £3.17 £18.21	£14.87 £3.17 £18.05	£0.16 £0.00 £0.16	1.1% 0.0% 0.9%
Total				
Collier Row District Centre				
Convenience Comparison	£17.80 £0.84 £18.64	£17.43 £0.84 £18.28	£0.36 £0.00 £0.36	2.0% 0.0% 1.9%
Total				
Elm Park District Centre				
Convenience Comparison	£4.76 £0.84 £5.60	£4.53 £0.84 £5.37	£0.22 £0.00 £0.22	4.7% 0.0% 4.0%
Total				
Out-of-centre Stores				
Convenience Comparison	£268.50 £161.02 £429.52	£250.54 £160.71 £411.24	£17.97 £0.31 £18.27	6.7% 0.2% 4.3%
Total				