

05.03 Planning context

Overview

The site falls within Havering Council, and as such the local Development Plan for the site comprises:

- The London Plan (2021);
- Havering Local Plan (2021);
- Romford Area Action Plan (2008); and
- Draft Romford Town Centre Masterplan

In addition, the National Planning Policy Framework (2023) is considered to be a material consideration when considering applications for planning permission.

London Plan (2021)

The following London Plan policies are those which are considered most relevant to the proposed scheme (of course other policy consideration also apply):

Policy SD1 (Opportunity Area)

- London Boroughs should support development creating employment opportunities and housing choices for Londoners in Opportunity Areas;
- Support wider regeneration and ensure that the development proposals integrate into surrounding areas; and
- Provide up to 5,000 homes and 500 jobs during the plan period. Policy SD6 (Town centres and high streets):
- Encourage mixed-use or housing-led intensification to ensure strong, resilient, accessible and inclusive hubs for Londoners; and

- The adaptation and diversification of town centres should be supported in response to the challenges and opportunities presented by multi-channel shopping and changes in technology and consumer behaviour, including improved management of servicing and deliveries.

Havering Local Plan (2021)

The site is not allocated in Havering's Local Plan however there are a number of policies within the local plan that are relevant to the site and any proposals for its redevelopment.

Policy 1 (Romford Strategic Development Area)

Draft Romford Town Centre Masterplan

The council have released the final consultation draft for Romford Town Centre Masterplan setting out their vision for Romford and a framework for future development. Within this document, our site, The Liberty Shopping Centre is directly referenced as part of the proposed strategic vision.



Planning context

Conservation area

The Romford Conservation Area, designated in 1968, encompasses the historic market town center of Romford in the London Borough of Havering. This Conservation Area Appraisal and Management Plan (CAAMP), prepared by Purcell in 2025, reviews and updates guidance for preserving this designated heritage asset.

Romford's significance stems from its ancient crossroads where the Roman road from London to Colchester crossed the River Rom. Granted a Market Charter in 1247, the town developed as a crucial trading post, with its historic street pattern still centered on the crossroads of Market Place, High Street, North Street, and South Street. The area's special interest derives from this commercial heritage and surviving historic buildings spanning multiple architectural periods.

Key heritage assets include the Grade II listed St Edward the Confessor Church (rebuilt 1856), Church House (15th/16th century), The Golden Lion pub, and several locally listed buildings. The document identifies architectural styles from medieval through to Art Deco, with notable examples including Neo-Georgian 1930s bank buildings and the Quadrant Arcade (1935).

However, the conservation area faces significant challenges. Mid-to-late 20th century redevelopment has eroded much historic character, leading to its inclusion on Historic England's Heritage at Risk register. Issues include inappropriate modern developments, unsympathetic building alterations, poor maintenance, and incongruous shopfronts and signage.

The document proposes boundary extensions to include full building plots and additional historic areas, while excluding architecturally inappropriate modern developments like the Liberty Shopping Centre. Management recommendations focus on preserving Market Place's historic function, encouraging high-quality development sensitive to historic context, removing inappropriate modern additions, and reinstating lost historic features.

The CAAMP provides detailed guidance for managing change, emphasizing that Romford's enduring role as a commercial hub should be preserved while enhancing its historic character for future generations.

Please refer to the Heritage and Townscape Visual Impact assessment submitted as part of this application for further detail.

key

Site boundary

Romford Conservation Area

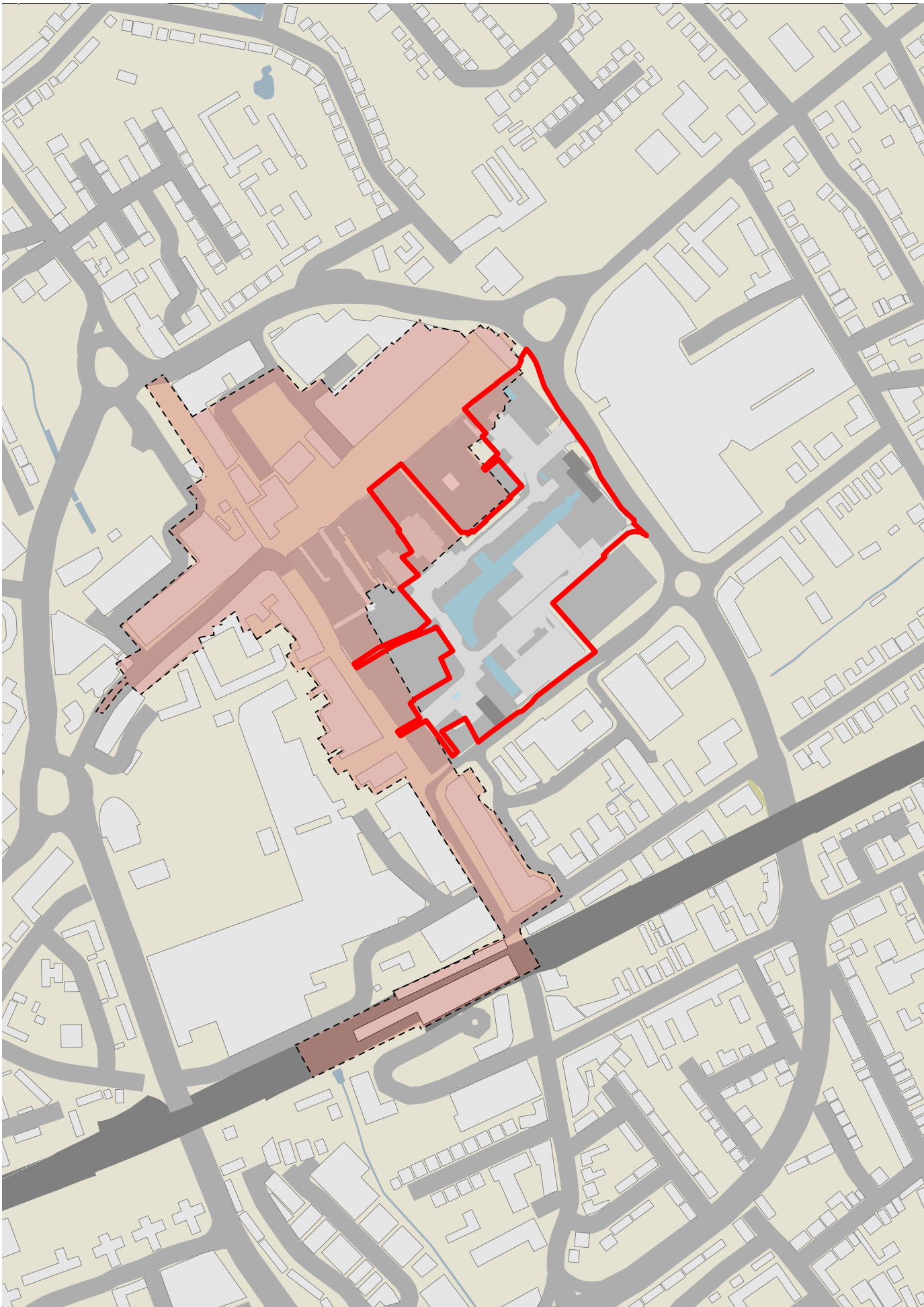


Figure 25 Map of Romford's conservation area

Planning context

Conservation area analysis

Romford Conservation Area was first designated in 1968 to protect a distinct group of historic buildings and centred on the medieval crossroads of Market Place. Recently, an updated Appraisal and Management Plan has been produced and adopted.

key

- Romford Conservation Area
- Consented development

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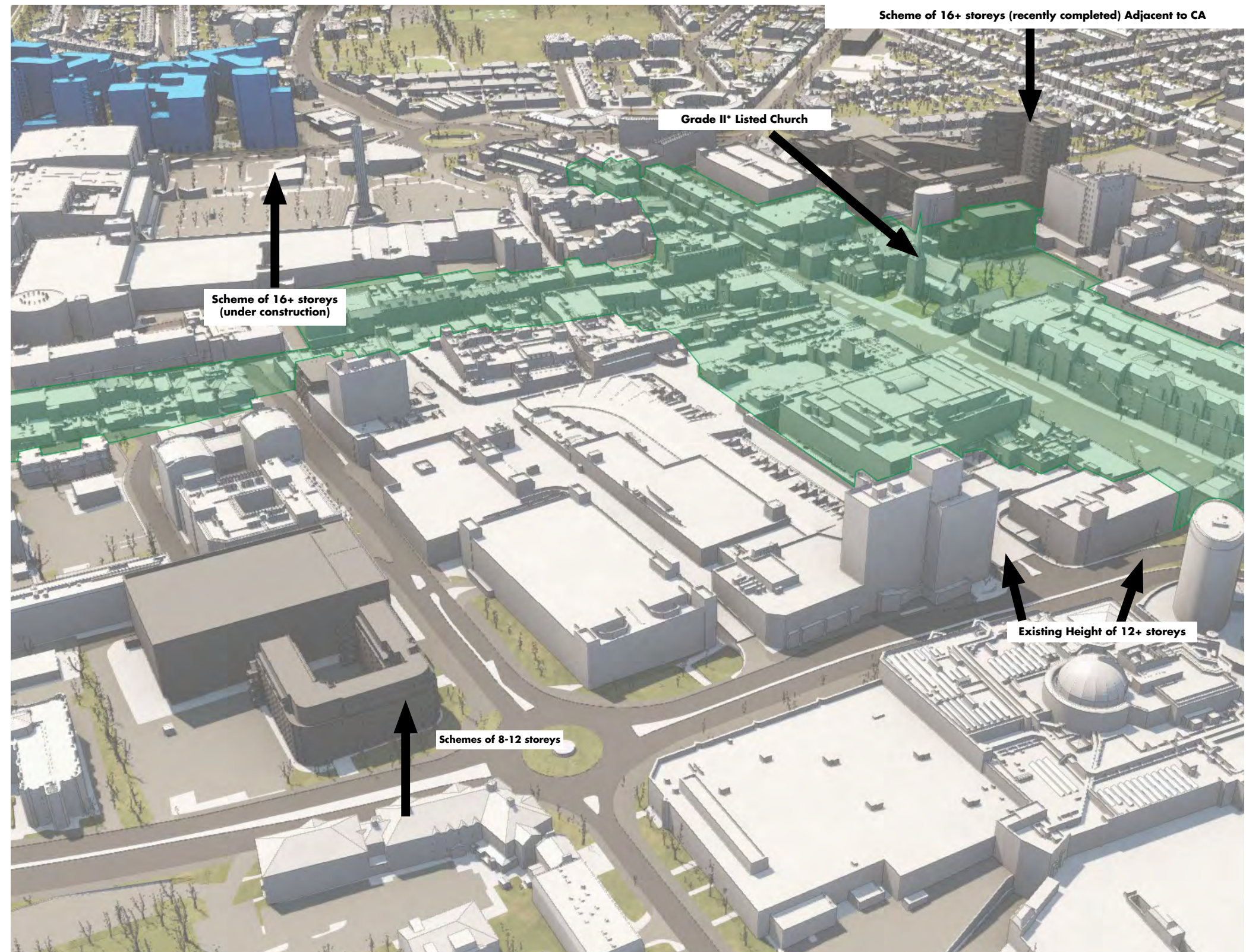


Figure 26 Orbit view for Romford with new CA boundary shaded in green showing existing and emerging height

Planning context

Emerging developments

Within the Conservation Area and its setting, there is already established height, alongside emerging submitted, consented and under construction schemes of taller buildings

key

Romford Conservation Area

Consented development

Recent/under construction development

Existing context

Submitted development

Site boundary

shedkm

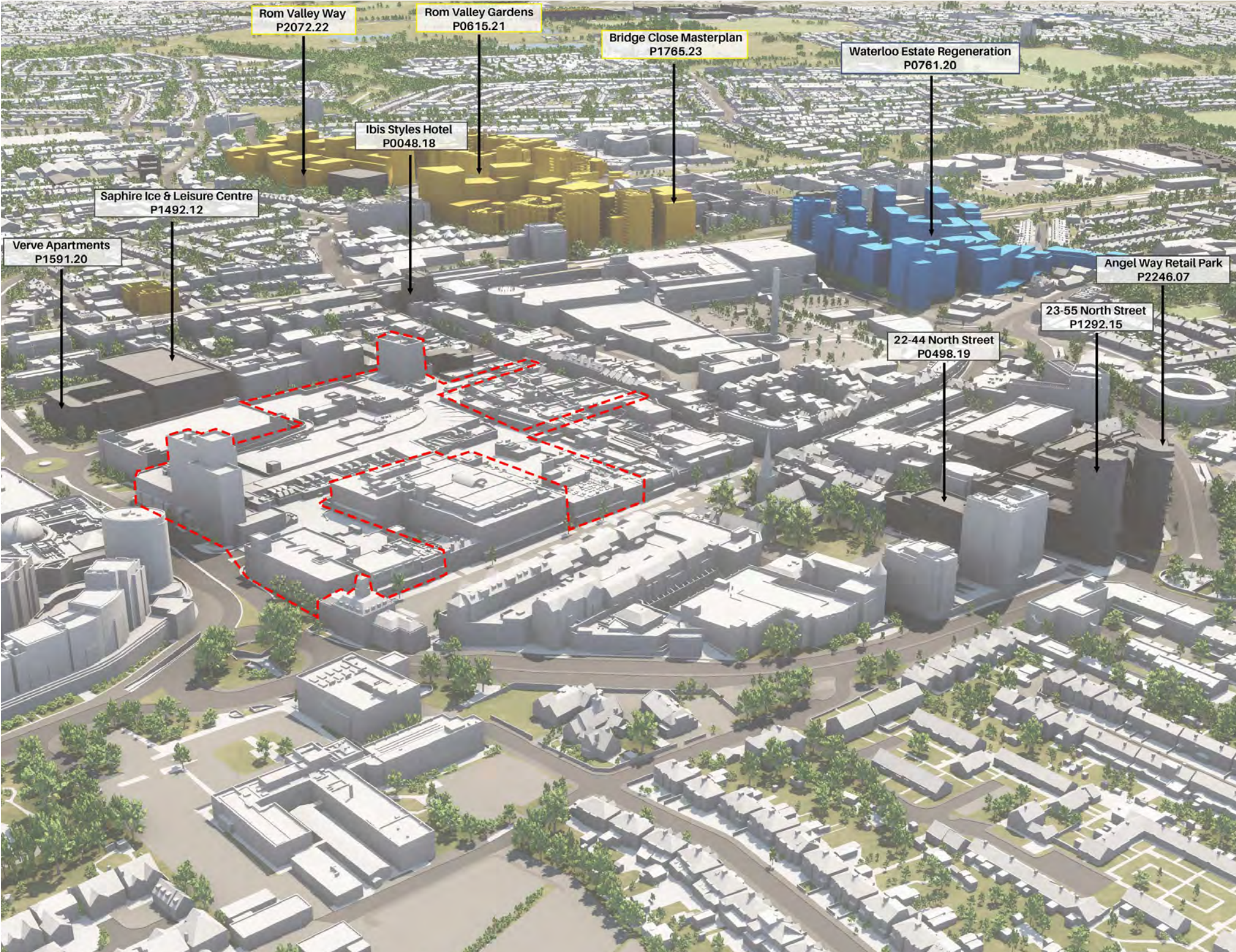


Figure 27 Orbit view for Romford with new CA boundary shaded in green showing existing and emerging height

Planning context

Conservation area - Market Place

The maximum parameters for Plots 2 and 3 will be guided by a design code that sets a parapet line consistent with the established proportions and building heights of the Market Place (as illustrated by the green lines)

In this image, the dashed line and translucent area indicate an allowance for elements such as plant equipment and lift cores.

Any new plant will be carefully screened and will represent a significant improvement compared to the current condition of rooftops along Market Place, which require upgrading and rationalisation.



Planning context

Opportunities for enhancement

The recently adopted Conservation Area Appraisal and Management Plan ('CAAMP') identifies "opportunities for enhancement" within the conservation area, these can also be considered as 'detracting buildings'.

This image overlays these detracting buildings with the site in 3D.

- key**
- Romford Conservation Area
 - Consented development
 - Opportunity for enhancement

shedkm



Figure 28 Orbit view for Romford with new CA boundary shaded in green and detracting buildings highlighted in pink

05.04 Emerging context

SPD

The Romford Town Centre Masterplan sets out a 15-20 year vision for Romford and a framework for future development. Gradual evolution over time to facilitate significant growth: potentially 12,000 new homes and 2650 new employment opportunities by 2041.

Within this document, our site, The Liberty Shopping Centre is directly referenced as part of the proposed strategic vision.

Core thematic principles:

- Interconnected urban greening
- Prioritising active travel
- Integrated sustainability strategies
- Inclusivity, health and wellbeing
- Preservation and enhancement of Romford's character and townscape
- Diversification of the town centre's offering
- Capitalising on Elizabeth Line connectivity to bolster the economy

Key spatial interventions:

- Recharacterising the ring road to an urban street
- Enhancing Market Place as the civic heart
- Creating a finer urban grain
- Ensuring inclusivity, safety and security
- Celebrating the River Rom

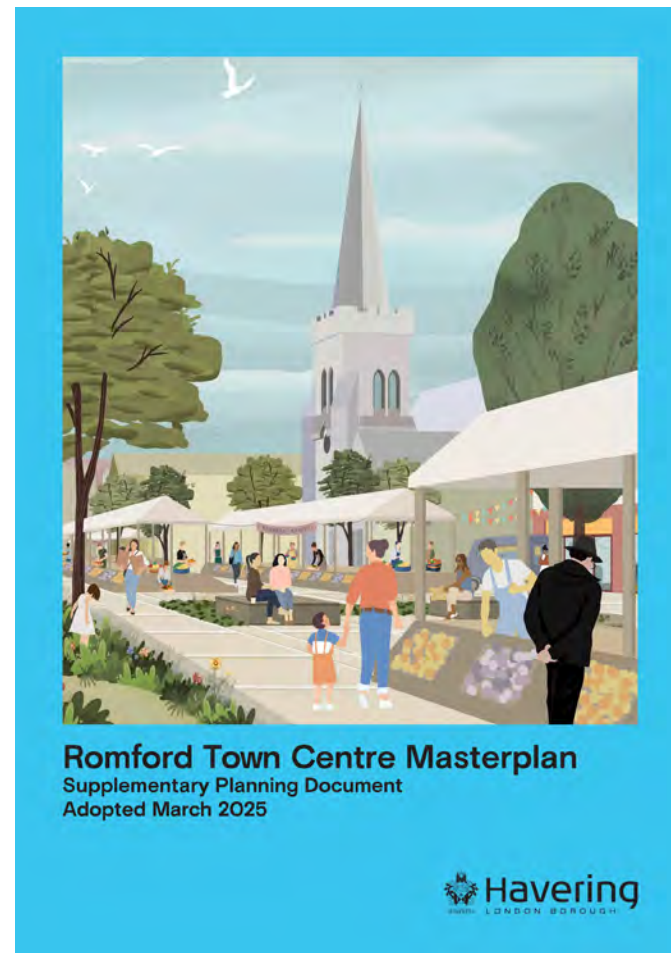


Figure 29 Extract of SPD - front cover



Figure 30 Extract of SPD - illustrative sketch of Romford's SPD vision

Emerging context

SPD

The SPD highlights key opportunity areas for enhancement and regeneration and proposes an illustrative massing for those distinct neighbourhoods. It is important to consider proposals to the Liberty Shopping Centre within this future context.

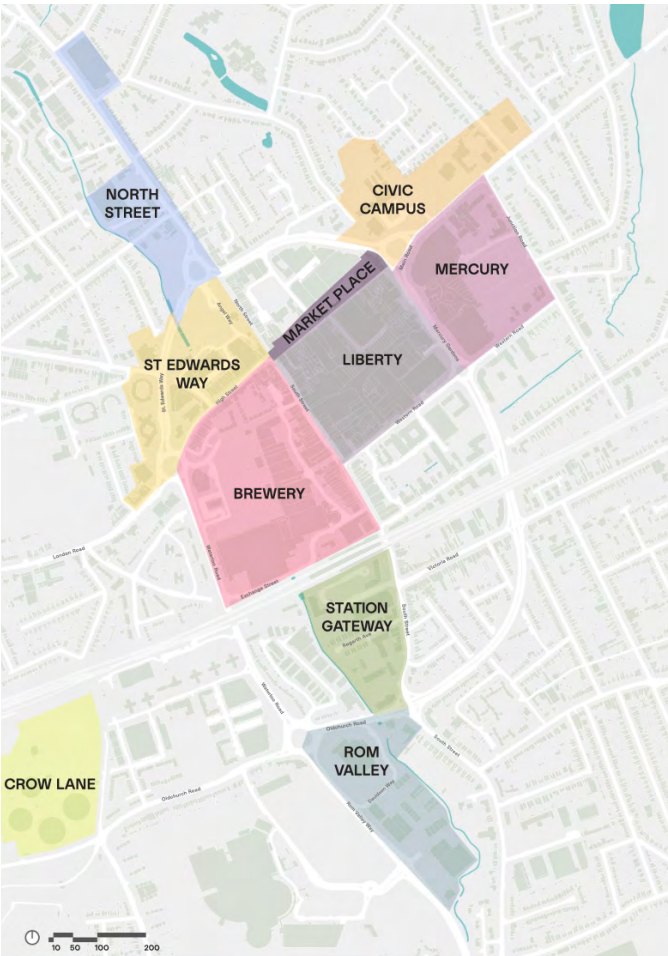


Figure 31 Extract of SPD



Figure 32 Overview of Romford Masterplan SPD illustrative massing proposals

Emerging context

SPD - Liberty

Within this document, our site, The Liberty Shopping Centre is directly referenced as presenting significant transformation opportunities.

Vision and Character:

- Sensitivity to conservation area and positive engagement to the rejuvenated Market Place.
- Maintaining active ground floor uses of the shopping centre
- Introduction of residential accommodation with raised communal amenity above the shopping centre
- Suitability for height, particularly to the South of Mercury House

Urban Grain and Accessibility

- Breaking down existing large-scale blocks to create finer urban grain.
- Publicly accessible streets to remain open beyond shopping hours, improving integration with the wider town centre.

Phased Implementation

- Due to the site's current retail importance, evolution must be incremental,
- Continuous commercial activity must remain
- Careful coordination and collaborative approaches between multiple landowners and existing lease arrangements.

Mixed-Use Integration

- Ground-floor commercial uses should focus on supporting rather than competing with Market Place activities e.g. f&b
- Employment opportunities to front Mercury Gardens, demonstrating the connectivity principle
- Residential accommodation above

Movement and Public Realm

- Pedestrian-friendly internal streets and improving connections to surrounding areas
- Enhanced public realm at the development's heart, positively engaging with Market Place and South Street as focal areas.

Sustainability Integration

- Liberty's redevelopment should incorporate comprehensive sustainability measures: urban greening, sustainable drainage systems, energy-efficient design, and circular economy principles.
- The site's central location makes it ideal for demonstrating innovative approaches to sustainable town centre living.

Through careful application of these principles, the Liberty site can evolve from an inward-looking shopping centre to an integral part of Romford's urban fabric, supporting the town centre's role as a distinctive, sustainable, and inclusive regional destination.



Figure 33 Extract visual from Romford Masterplan depicting the Liberty site



Figure 34 Extract map from Romford Masterplan depicting the Liberty site

Emerging context

SPD - Liberty

Rigorous analysis of the SPD's illustrative scheme to the Liberty Shopping Centre has been undertaken to learn from and implement its key principles.

Residential led development

- Site wide residential regenerative strategy to provide much needed homes
- Debenhams represents a further opportunity to provide residential development that could address Market Place through new build or retrofit/facade retention

New public spaces with improved permeability of the site

- Utilising existing movement corridors, opening them to the air to create 24hr access + active travel streets, improving connections north/south + east/west
- New public spaces - Liberty Square and intimate space to rear of the Bull pub
- Debenhams could provide an opportunity to link north plots and provide additional public spaces
- Connections to Mercury Gardens could be improved

Ground floor retail and active frontages

- External active frontages throughout the site
- Opportunities for retail on key routes
- Debenhams could provide additional ground floor retail fronting Market Place

Phased evolution

- Plots can be developed without impact to the functionality of the Liberty centre
- Debenhams represents a missed opportunity to bring forward an early stage phase
- Plots straddled by existing service road are unable to come forward as shown without the demolition of the Liberty centre at ground and its service road at first floor



Figure 35 Map showing the Romford Masterplan SPD illustrative proposal for the Liberty site

Emerging context

Emerging Developments

Romford is identified in the Mayor’s London Plan as an Opportunity Area (OA) with potential for 5,000 new homes and 500 new jobs by 2041. The OA was designated 2021 and is part of the Elizabeth Line East Growth Corridor.

In line with this guidance there are several emerging consented or under construction schemes with elements greater than 14 storeys within close proximity to the Liberty Shopping Centre.

The emerging developments seen across Romford represent a similar scale and use to that proposed as part of this submission; namely with buildings over 15 storeys in height with a largely residential focus.

Other recently submitted proposals have not been included in this diagram as they have been in abeyance for several years: 6-14 Highstreet (undecided since 2021)

- 01 Como Street - 138 homes - submitted**
- 02 Angel Way, 350 homes - in construction**
- 03 North Street, 98 homes - in construction**
- 04 Waterloo Road, 1,380 homes - consented**
- 05 Bridge Close, 1070 homes - submitted**
- 06 Rom Valley Gardens ,972 homes - submitted**
- 07 Rom Valley Way , 840 homes - submitted**

key
Emerging developments

shedkm



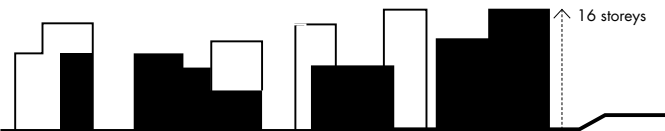
Figure 36 Overview of emerging developments in central Romford

Emerging context

Emerging Developments

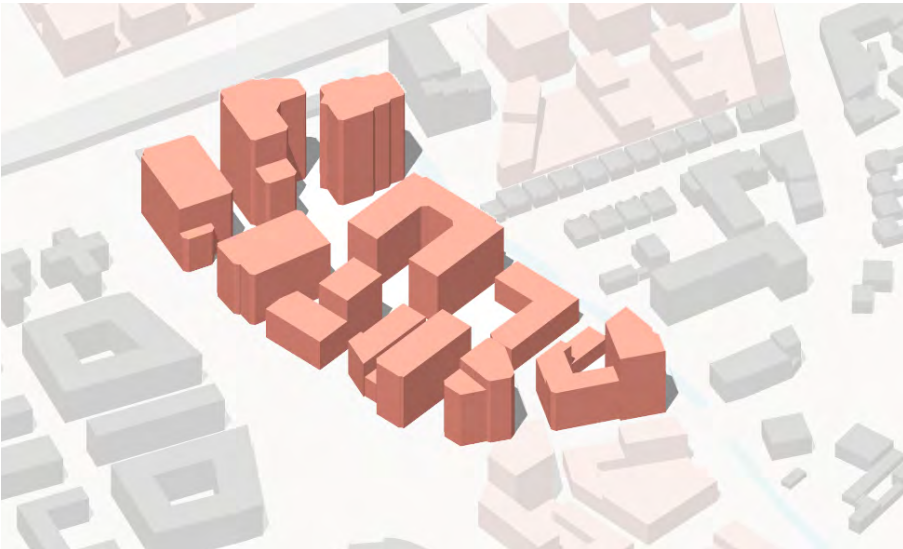
Waterloo Road

1,380 homes



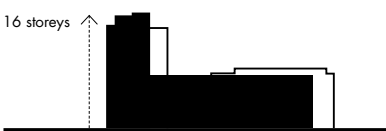
Bridge Close

1,070 homes



Angel Way

1,350 homes



North Street

98 homes



Emerging context

Emerging Developments

Rom Valley Way

972 homes



Rom Valley Gardens

840 homes



Como Street

138 homes





Key strategic moves

06.01 Key strategic moves

The Liberty today

Whilst The Liberty shopping centre is a popular shopping destination, its relationship to Romford, its history and context, is poor and creates a large urban grain that is not reflective of the market town

This is compounded in places by inactive and dead frontages that do not add to Romford and work to hide the vibrant shopping hub that sits centrally to the site. Aside from Western Road, the entrances to the shopping centre are unbecoming in scale, or tucked away.

Another challenge facing the sites fringes are the inappropriate uses that front key streets - to the northeast corner of the historic market + conservation area is a dilapidated multistorey car park (01). There is a further car park fronting Western Road (02).

Two buildings of height existing on the site, Mercury House (03), and Lambourne House (04). Mercury House is generally of a good size and has the potential for retrofitting. Lambourne House has a much smaller footprint making it less practical for potential retrofit and there is complexity to have it structurally intertwines with the retail within its proximity.

At first floor above the shopping centre the service road wraps the site, servicing The Liberty and other stores. Connected to the adopted road is substantial areas of tarmaced areas that facilitate adhoc servicing and further non-public car parking.

The Liberty Masterplan has the opportunity to transform this central piece of Romford's town centre and look at how the site and its fringes can be rethought, redesigned and revived to positively contribute to its context.

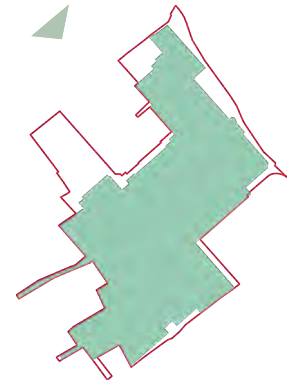
key

-  liberty shopping centre
-  internal route
-  external route

shedkm



Figure 37 Masterplan overview - the liberty today



Key strategic moves

Reconnecting with Romford

This initiative aims to preserve the Liberty shopping centre's role as a beloved hub for Romford locals, while building on its existing strengths. By focusing on the positives of the current condition, we will amplify what is already great about the Liberty. We will extend its appeal by pushing back the built fabric to make the centre more visible.

Key elements include:

- Emphasizing the centre's role as a shelter from the elements through its indoor retail environment
- Extending opening hours along the primary thoroughfare to improve permeability
- Providing improved internal seating and planting to enhance comfort and dwell time
- Collaborating with current leaseholders to ensure a bright, stable future for all

key

- retained shopping centre core
- pushing back the built fabric

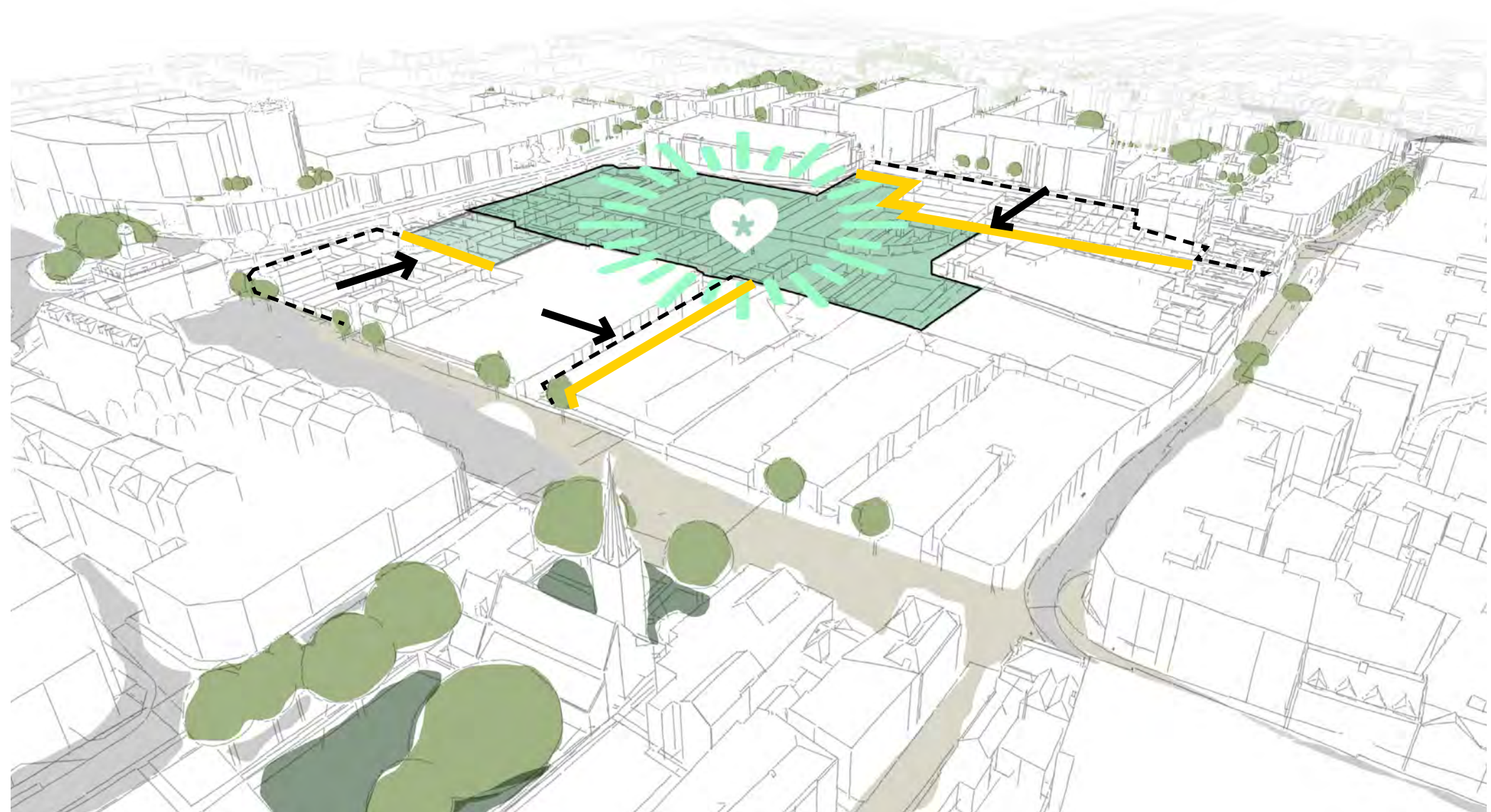


Figure 38 Masterplan overview - reconnecting with Romford

Key strategic moves

Considered connected development

To maintain the Liberty's function as an operational shopping centre, key zones for development opportunities have been identified. The applicant team has conducted rigorous analysis of existing conditions, considering factors such as vacant units, current leases, empty shopfronts, entrance footfall, and key routes that could benefit from regeneration.

Zone 01

Identified as an appropriate first plot with potential for height, due to its southern location, proximity to the Elizabeth line station, and its position outside Romford's conservation area.

Zone 02 and Zone 02a

Identified as vacant units in strategically important locations for enhancing connections to the Market Place and Mercury Gardens.

Zone 03

Identified as an opportunity for development owing to under-utilised frontages onto the Market Place and Swan Walk.

Connectivity and future masterplan

These zones are connected by emerging developments that fall outside the applicant team's scope. Notably, mixed-use development on the former Debenhams site* and the introduction of padel courts on the roof of the multi-storey car-park on Western Road**. Taken together, these elements form a coherent, connected masterplan vision for the future.

key

- retained shopping centre core
- emerging development within scope
- emerging developments outside of scope

shedkm

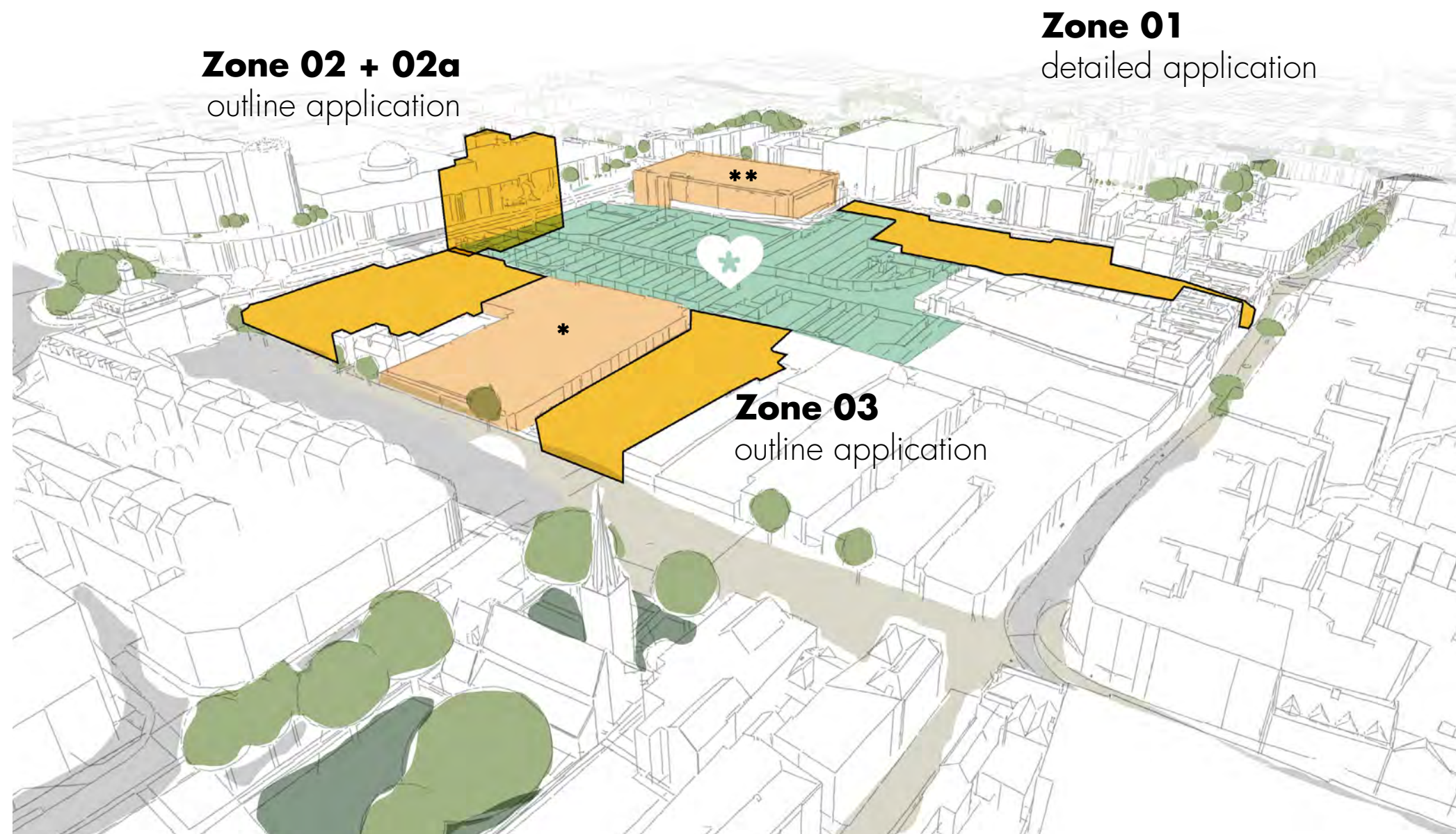
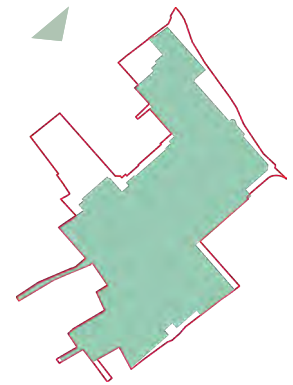


Figure 39 Masterplan overview - considered connected development