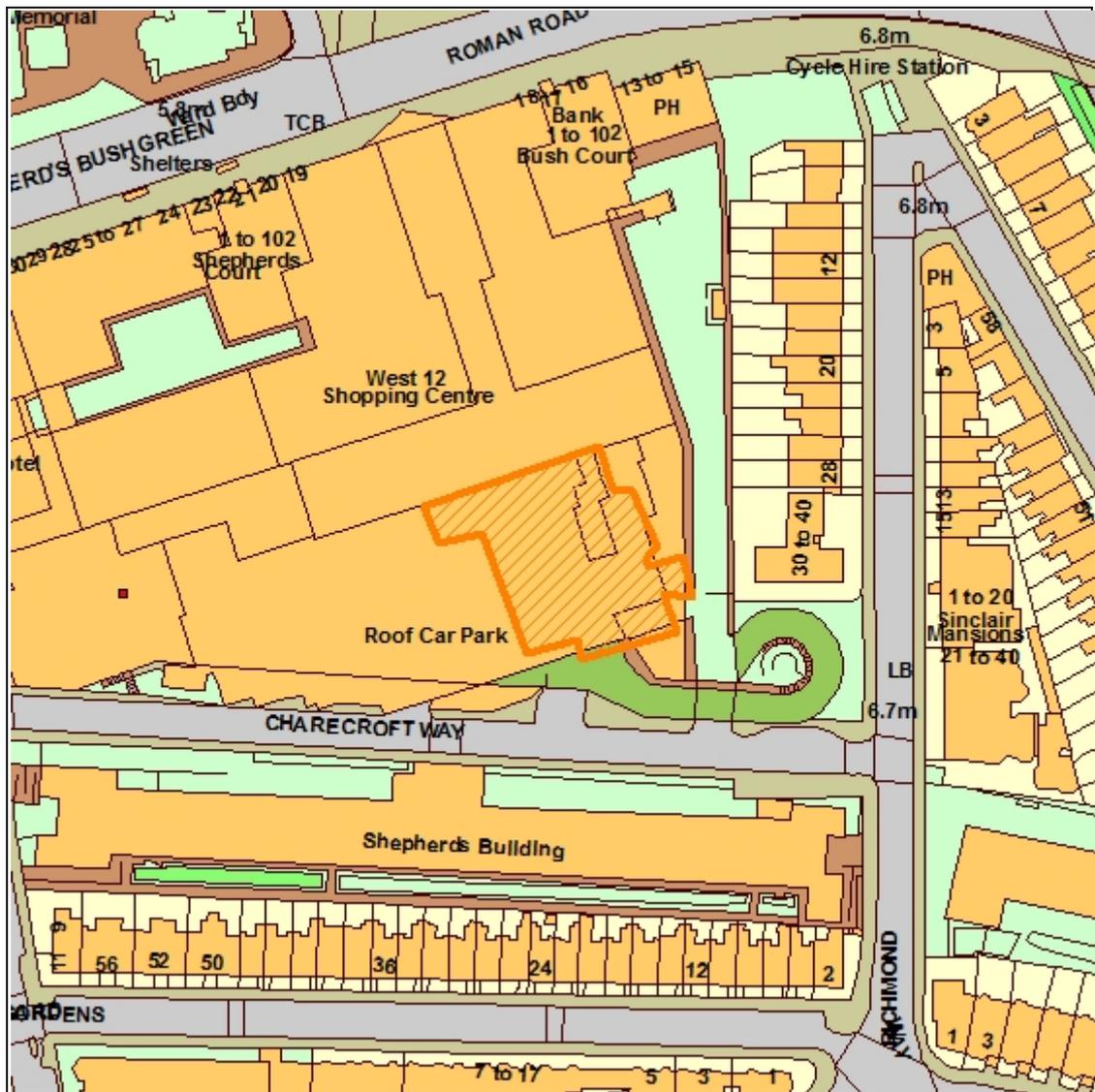


Ward: Addison

Site Address:

West 12 Shopping Centre Shepherd's Bush Green London W12 8PP



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For identification purposes only - do not scale.

Reg. No:
2025/01303/FUL

Case Officer:
Elliot Brown

Date Valid:
06.06.2025

Conservation Area:

Committee Date:
10.02.2026

Applicant:

Mr M Damelin

Flat 1, Glendower Lodge The Rise London NW7 2LL

Description:

Change of use of part of the basement of the shopping centre from Class E into a self-storage (Use Class B8); replacement of existing double door with a new single glazed door and installation of 4no external louvres to eastern elevation of the building at ground floor level.

Drg Nos: See Condition 2.

Application Type:

Full Detailed Planning Application

Officer Recommendation:

- 1) That the Committee resolve that the Director of Planning and Property be authorised to grant planning permission upon the completion of a satisfactory legal agreement and subject to the conditions listed below.
- 2) That the Committee resolve that the Director of Planning and Property, after consultation with the Assistant Director of Legal Services and the Chair of the Planning and Development Control Committee be authorised to make any minor changes to the proposed Heads of Terms of the legal agreement or proposed conditions, which may include the variation, addition or deletion of conditions, any such changes shall be within their discretion.

Conditions:

- 1) The development hereby permitted shall not commence later than the expiration of 3 years beginning with the date of this planning permission.

Condition required to be imposed by section 91(1)(a) of the Town and Country Planning Act 1990 (as amended by section 51 of the Planning and Compulsory Purchase Act 2004).

- 2) The development hereby permitted shall be carried out in complete accordance with the following approved drawing numbers, other than where those details are altered pursuant to the conditions of this planning permission:

Drawings

211265-01; P04A; P05.

Documents

Cycle and Refuse Note.

Energy Statement for Planning (Ref. 6408, Issue 3, dated October 2025).

Fire Strategy Report (Ref. 7959, REV 2, dated August 2025) prepared by Atelier Ten.

Isor 200 EC K 01 Fan Specification.

Noise Impact Assessment (Ref. AS14102.250602.NIA, dated 05 June 2025) prepared by Clarke Saunders.

Transport Statement (dated June 2025) prepared by The Transportation Consultancy Ltd.

To ensure full compliance with the planning application hereby approved and to prevent harm arising through deviations from the approved plans.

- 3) The development hereby approved shall be carried out and completed in accordance with the materials details (including colour and finish) specified below:

Replacement door: Glazed sliding door.

Louvred ventilation grilles: of a design and material to match the existing ventilation grille.

The development shall be permanently retained in accordance with the approved details. Any works of making good to existing elevations shall be carried out in materials to match the elevation to which the works relate.

To ensure a satisfactory external appearance, in accordance with Policies DC1 and DC4 of the Local Plan (2018).

- 4) The basement premises (consisting of the subject 1,280sqm basement floorspace) shall only be used as a self-storage facility (Use Class B8) and shall not be used for any other purpose falling within Use Class B8 of the Town and Country Planning (Use Classes) Order 1987 and The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.

In granting this permission, the Council has had regard to the special circumstances of the case. A different use of the property would raise materially different planning considerations that the Council would wish to consider at that time, in accordance with Local Plan (2018) Policies E1, T1, T2, T4, T7, CC11 and CC13 and Policies D13, D14, E4, T5, T6 and T7 of The London Plan (2021), and the National Planning Policy Framework (2024).

- 5) Prior to first use of the self-storage facility (Use Class B8) hereby approved, details (including numbers, location, materials and design) of the proposed long-stay cycle parking provision shall be submitted to, and approved in writing by, the Council. The approved details shall thereafter after be installed prior to first use of the self-storage facility and shall be retained and maintained for the lifetime of the development.

To ensure a satisfactory provision of cycle parking, in accordance with Policy T5 of the London Plan (2021).

- 6) The external sound level emitted from plant, machinery or equipment at the development hereby approved shall be lower than the lowest existing background sound level by at least 10dBA in order to prevent any adverse impact. The assessment shall be made in accordance with BS4142:2014 at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity.

To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise from plant/mechanical installations/ equipment, in accordance with Policies CC11 and CC13 of the Local Plan (2018).

- 7) Prior to first use, machinery, plant or equipment, extract/ventilation system and ducting at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such.

To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by vibration, in accordance with Policies CC11 and CC13 of the Local Plan (2018).

- 8) No advertisements, external air-conditioning units, ventilation fans, extraction equipment, flues or other plant equipment and associated external pipework or ducting (excluding solar panels and air source heat pumps) shall be fitted to the exterior of the building unless otherwise shown on the approved drawings.

To ensure a satisfactory external appearance and to prevent harm to the amenities of the occupiers of neighbouring residential properties, in accordance with Policies DC1, DC4 and HO11 of the Local Plan (2018).

- 9) Prior to commencement of the development hereby approved the following shall be submitted to, and approved in writing by, the Council:

(i) A Construction Management Plan

Details shall include monitoring and control measures for noise, vibration, lighting, delivery locations, contractors' method statements, waste classification and disposal procedures and locations, restriction of hours of work and all associated activities audible beyond the site boundary to 0800-1800hrs Mondays to Fridays and 0800-1300hrs on Saturdays and not on Sundays or Bank Holidays, advance notification to neighbours including local occupiers and other interested parties of proposed works and public display of contact details including accessible phone contact to persons responsible for the site works for the duration of the works. The approved details shall be implemented throughout the project period.

(ii) A Construction Logistics Plan

This shall be in accordance with Transport for London (TfL) requirements and must seek to minimise the impact of construction traffic on nearby roads and restrict construction trips to off peak hours only. The details shall also include the numbers, size and routes of construction vehicles, and other matters relating to traffic management to be agreed. The approved details shall be implemented throughout the project period.

To ensure that construction works do not adversely impact on the operation of the public highway, and that the amenity of occupiers of surrounding premises is not adversely affected by noise, vibration, lighting or other emissions from the building site, in accordance with policies T1, T6, T7, CC10, CC11, CC12 and CC13 of the Local Plan (2018).

Justification for Approving the Application:

- 1) 1) The proposed development is acceptable in land use terms. The proposal is compatible with the objectives of the White City Regeneration Area which is well served and accessible by public transport. The development is considered acceptable with no significant adverse impact in terms of additional noise and disturbance to surrounding residential amenity, nor does it impact negatively on transport. The use is compatible with the surrounding uses within Westfield Shopping centre and ensures the vitality and viability of the centre, as well as enhancing the diversity on offer. In this respect the proposal complies with Policies WCRA, TLC1, TLC2, T1, CC10, CC11, CC12 and CC13 of the Local Plan (2018) and relevant Key Principles of the Planning Guidance Supplementary Planning Document (2018).

- 2) Further, the proposed development is considered not to adversely impact on the character and appearance of the nearby Conservation Areas. In these respects, the development accords with Policies DC1, DC4, DC8 and HO11 of the Local Plan (2018).

- 3) Residential amenity: The impact of the proposed development upon adjoining occupiers is considered acceptable. Subject to conditions and obligation, the proposal would not have an adverse impact on neighbouring residential amenity in terms of noise and disturbance. In this regard, the development would respect the principles of good neighbourliness. The proposed development therefore accords with Policies CC11, CC12, CC13, and HO11 of the Local Plan (2018).

- 4) Highways matters: Subject to conditions there would be no adverse impact on traffic generation and the scheme would not result in congestion of the primary road network. The site's proximity to existing public transport facilities and access to walking and cycling routes make it a highly sustainable site. A large proportion of visitors will already be at Westfield and would travel by public transport. In this respect, travel patterns will be covered by the existing Westfield Travel Plan. Furthermore, the excellent level of public transport links is considered to ensure that the proposed change of use of part of the former Debenhams unit would not result in any adverse highways implications. The development would therefore be acceptable in accordance with the NPPF (2024), Policies T1, T3 and T4 of the London Plan (2021), Policies T1, T2, T3, T4, T5, CC7, CC9, CC10, CC11, CC12 and CC13 of the Local Plan (2018) and Policies TR1, TR2, TR3 and WM9 of the Planning Guidance Supplementary Planning Document (2018).

- 5) Safety and Access: The development would provide a safe and secure environment for all users in accordance with London Plan Policy D11 (2021) and Policy DC2 of the Local Plan (2018). The proposal would provide ease of access for all people, including disabled people, in accordance with Policies D5 and D11 of the London Plan (2021), Policies E3 of the Local Plan (2018) and Key Principles DA1, DA6 and DA9 of the Planning Guidance Supplementary Planning Document (2018).

**LOCAL GOVERNMENT ACT 2000
LIST OF BACKGROUND PAPERS**

All Background Papers held by Andrew Marshall (Ext: 4841):

Application form received: 9th May 2025
Drawing Nos: see above

Policy documents: National Planning Policy Framework (NPPF) 2024
The London Plan 2021
LBHF - Local Plan 2018
LBHF – Planning Guidance Supplementary Planning Document
2018

Consultation Comments:

Comments from:

Dated:

Neighbour Comments:

Letters from:

Dated:

Hammersmith Town Hall Extension King Street London W6 9JU 20.06.25

1.0 SITE DESCRIPTION

- 1.1 The West 12 Shopping Centre is bounded by Shepherd's Bush Green, Richmond Way, Charecroft Way and Rockley Road to the north, east, south and west, respectively. This planning application relates specifically to part of the basement level of the West 12 Shopping Centre and to a small section of the eastern elevation (facing Richmond Way) of the Shopping Centre, where some external alterations are proposed. Officers note that the basement level concerned is currently neither open nor accessible to members of the public.
- 1.2 The application site is located within the Shepherd's Bush Town Centre. Using the Transport for London Methodology, the site has a Public Transport Accessibility Level (PTAL) rating of 6b, which indicates excellent public transport accessibility. The Shepherd's Bush London Underground and London Overground stations are in close proximity, to the north of the application site.

1.3 The application site is not located within a Conservation Area, although the Lakeside/Sinclair/Blythe Road Conservation Area is located to the south of the site.

2.0 RELEVANT PLANNING HISTORY

2.1 There is extensive planning history relating to the West 12 Shopping Centre, however, there does not appear to be any specific planning records relating directly to the basement area that is the subject of this planning application.

3.0 PROPOSAL

3.1 The current planning application seeks planning consent for the change of use of 1,280 square metres (sqm) of (currently) unused ancillary basement floorspace of the West 12 shopping centre from Use Class E into self-storage (Use Class B8) and associated external alterations which would involve the replacement of the existing double door with a new single glazed door and the installation of 4no external louvres to the eastern elevation of the building at ground floor level.

3.2 The applicant is 'Lockit Local Limited', a new business which seeks to repurpose underutilised areas of urban properties (e.g., basements, underground car parks or storerooms) in sustainable locations to self-storage use, with the aim of providing an affordable storage option for local residents and local businesses.

3.3 The basement floorspace would provide approximately 175 individual self-storage units (of a range of sizes, between 5 sqm and 14 sqm), which can be rented by private individuals or by small companies looking for temporary storage space.

3.4 The operational requirements of the proposal mean that no staff members are required on site, as access is controlled via secure digital key access. The self-storage facility would be monitored remotely for security purposes.

4.0 PUBLICITY AND CONSULTATION RESPONSES

Statutory Consultation

4.1 A site and press notice were published to advertise this application and notification letters were sent to the occupants of 379 surrounding properties.

4.2 No objections or other correspondence has been received in regards to these notifications.

External consultee responses

4.3 No external consultee responses have been received.

5.0 POLICY FRAMEWORK

- 5.1 The Town and Country Planning Act 1990, the Planning and Compulsory Purchase Act 2004 and the Localism Act 2011 are the principal statutory considerations for town planning in England.
- 5.2 Collectively the three Acts create a plan led system which requires local planning authorities to determine planning applications in accordance with an adopted statutory development plan unless there are material considerations which indicate otherwise (section 38(6) of the 2004 Act as amended by the Localism Act).
- 5.3 In this instance the statutory development plan comprises the London Plan (2021) and the Local Plan (2018). A number of strategic and local supplementary planning guidance and other documents are also material to the determination of the application.

National Planning Policy Framework (December 2024)

- 5.4 The National Planning Policy Framework (NPPF) came into effect on 27 March 2012 and was revised in 2024 and is a material consideration in planning decisions. The NPPF, as supported by the Planning Practice Guidance (PPG) sets out national planning policies and how these are expected to be applied.
- 5.5 The NPPF does not change the statutory status of the development plan as the starting point for decision making. Proposed development that accords with an up to date Local Plan should be approved and proposed development that conflicts should be refused unless other material considerations indicate otherwise.

London Plan

- 5.6 The London Plan was published in March 2021. It sets out the overall strategic plan for London and a fully integrated economic, environmental, transport and social framework for the development of the Capital over the next 20-25 years. It forms part of the development plan for Hammersmith and Fulham.

Local Plan

- 5.7 The Council adopted the new Local Plan on 28 February 2018. The policies in the Local Plan together with the London Plan make up the statutory development plan for the borough. The Planning Guidance Supplementary Planning Document (SPD) (February 2018) is also a material consideration in determining planning applications. It provides supplementary detail to the policies and is organised around key principles.

6.0 PLANNING ASSESSMENT

6.1 The main considerations material to the assessment of this application are summarised as follows:

- Land use;
- Design and visual amenity;
- Impact upon neighbouring amenity;
- Highways/parking;
- Fire safety;
- Energy and sustainability;
- Flood risk.

LAND USE

+ Principle of self-storage facility (Use Class B8)

- 6.2 The planning application seeks consent for the change of use of 1,280 sqm of part of the currently vacant basement level of West 12 Shopping Centre (approximately 10%) into a self-storage use (Use Class B8 - Storage or Distribution), to provide 175 individual storage units.
- 6.3 Policy E4 of the London Plan (2021) states that a sufficient supply of land and premises should be provided and maintained in different parts of London, to meet current and future demands for industrial and related functions, including for light and general industry (Use Classes B1(c) and B2) and storage and logistics/distribution (Use Class B8).
- 6.4 Policy E1 of the Local Plan (2018) does not address Use Class B8 directly, but it does provide an overarching locational criterion for new employment uses: 'the Council will also take into account whether the scale and nature of the development is appropriate, having regard in particular to local impact, the nature of the surrounding area and public transport accessibility'.
- 6.5 Hammersmith and Fulham does not have protected industrial locations, with this need met in the Old Oak and Park Royal Development Corporation (OPDC) and outer West London strategic reserve. Due to the application site being located within the Shepherds Bush Town Centre, the proposal would not result in the loss of industrial. Officers do acknowledge that the proposed self-storage usage is not listed as a main town centre use within the glossary (Page 75) of the National Planning Policy Framework (NPPF, 2024), however, it is considered that it would provide support to local businesses and other local occupiers.
- 6.6 Nevertheless, officers highlight that Paragraph 90 of the NPPF (2024) specifies that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Paragraph 90 (c) goes on to state that planning policies should retain and enhance existing markets and, where appropriate, re-introduce or create new ones. In this context, officers consider that the town centre location of the proposed small self-storage facility, combined with the targeted user market (residents and local businesses), would introduce new small self-storage facilities which could benefit the local community, to an area where no

similar facilities currently exist.

- 6.7 Furthermore, the scale of the proposal and its siting within an area of excellent public transport accessibility is considered to enable the potential side effects (such as vehicle trip generation and noise/disturbance) to be effectively mitigated in accordance with relevant London Plan and Local Plan policies and guidance, to ensure that any adverse impacts are mitigated. These are discussed in more detail later on in this committee report.
- 6.8 Overall, the proposal would not result in the loss of any existing industrial land, nor current employment land within London and would introduce a new self-storage facility within a highly accessible and sustainable town centre location. In this respect, officers consider the proposal to be consistent with the aims of Paragraph 90 of the NPPF (2024), Policy E4 of the London Plan (2021) and Policy E1 of the Local Plan (2018), and raise no objection to this element of the proposed development.

+ Impact upon the vitality and viability of the Shepherd's Bush Town Centre

- 6.9 Policy TLC2 of the Local Plan (2018) outlines that changes of use from Use Class A (now Use Class E following the Use Classes Amendment Regulations (2020)) at street level will be permitted for alternative uses which can be shown to be complementary to the shopping frontage, maintain or increase the vitality and viability of the town centre and do not have an adverse impact on the local area.
- 6.10 West 12 Shopping Centre is a protected shopping frontage; however, the proposal would not result in any alteration to any of the existing commercial units which form part of West 12's protected shopping frontage (which fronts Shepherd's Bush Green). The proposal seeks the change of use of part of the vacant ancillary space at basement level (which is not currently open or accessible to members of the public) and the proposed external alterations would be to a modest section of the eastern elevation, fronting Richmond Way. Resultantly, officers are satisfied that given the considerations and scale of the proposed development that it would not result in any detrimental harm to the vitality and viability of the Shepherds Bush town centre. No objection would therefore be raised with regard to Policy TLC2 of the Local Plan (2018).

+ Small and medium enterprises (SMEs)

- 6.11 Officers have considered the development and consider that the development can be supported for its contribution towards meeting SME and affordable needs.
- 6.12 Overall, for the reasons outlined above, officers consider that the proposed change of use of part of the basement level Class E floorspace to a self-storage facility (Class B8) would result in a land use which is considered to be compatible with, and would not demonstrably harm the vitality and viability of Shepherds Bush town centre.

DESIGN AND VISUAL AMENITY

- 6.13 Paragraphs 135 and 139 of the National Planning Policy Framework (NPPF, 2024) specify that development should be visually attractive as a result of good architecture and be sympathetic to local character and history and permission should be refused for development of poor design.
- 6.14 Policy DC1 of the Hammersmith and Fulham Local Plan (2018) notes that all development should seek to create a high-quality urban environment which respects and enhances its townscape setting, whilst Policy DC4 notes that all alterations and extensions to existing buildings should be a subservient addition to the parent building and compatible with the scale and character of existing development, neighbouring properties and their settings.
- 6.15 The proposed external alterations relate to a section of the eastern elevation (facing Richmond Way) of the West 12 Shopping Centre. The proposal would seek to replace the existing timber door-set with a glazed automated sliding door-set. Officers note that this external alteration would not enlarge the existing door-set opening. Officers consider that the design and materials of the proposed door would have a neutral impact upon the character and appearance of the surrounding area.
- 6.16 There is one existing louvred ventilation grille located above the existing basement entrance door. The proposal seeks to install four additional small louvred ventilation grilles above the proposed entrance to the self-storage facility, to serve air circulation plant. The dimensions of the proposed ventilation grilles would replicate the existing ventilation grille, whilst their siting would ensure proportionate and subservient additions to the building.
- 6.17 In terms of the external alteration's visibility in public views, officers highlight that the proposed external alterations would be set-back from Charecroft Way, limiting their visibility, whilst the vehicle access ramp leading to the existing West 12 Shopping Centre car park would effectively screen the proposed external alterations in any public views from Richmond Way. Overall, officers consider that the proposed external alterations are of a design, siting and material which would ensure complementary and subservient additions to the subject building. No objections would be raised with regard to Section 12 of the NPPF (2024) or Policies DC1 and DC4 of the Local Plan (2018).

IMPACT UPON NEIGHBOURING AMENITY

- 6.18 Policy D13 (c) of the London Plan (2021) specifies that new noise and other nuisance generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses.
- 6.19 Policy D14 of the London Plan (2021) outlines that in order to reduce, manage and mitigate noise, residential and other non-aviation proposals should manage noise so that the existing and potential adverse impacts on, from, within, as a result of, or in the vicinity of new development is mitigated and minimised. The agent of change principle as set out in Policy D13 of the London Plan (2021) should also be reflected.

- 6.20 Policy CC11 of the Local Plan (2018) specifies that noise generating development will not be permitted, if it would be liable to materially increase the noise experienced by the occupants/users of existing or proposed noise sensitive uses in the vicinity. Policy CC13 of the Local Plan (2018) specifies that where appropriate, the Council will require mitigation measures if a nuisance (for example noise and vibration) would otherwise be likely to occur.
- 6.21 Policy HO11 of the Local Plan (2018) outlines that proposals for external alterations should ensure that there would be no detrimental impact to the amenity of neighbouring occupants, with regard to existing levels of privacy, daylight and sunlight and outlook.
- 6.22 The application site is located within the Shepherd's Bush Town Centre and officers consider that the surrounding locality is of a mixed usage including commercial and residential uses. For example, the Shepherd's Building is situated to the south of the application site, and this contains commercial (Class E) floorspace. Meanwhile, the West 12 Shopping Centre itself is a retail and leisure complex which accommodates a variety of uses including retail shops, a cinema, a gym, bingo and bars, amongst other uses.
- 6.23 The residential accommodation within the surrounding locality of the application site includes those properties along Richmond Way, to the east of the application site, and the residential accommodation contained within Shepherd's Court and Bush Court, which are residential towers located above the West 12 Shopping Centre, located to the north of the application site. The proposal's impact upon the amenity of surrounding occupants will be assessed below.

+ Noise and vibration

- 6.24 The proposal would necessitate the installation of air circulation equipment within the basement area, with four new louvre ventilation grilles installed within the eastern elevation (as discussed previously). The Council's Environmental Health team have reviewed the proposal and subject to conditions on noise levels to ensure that the external sound level emitted from the proposed plant/machinery equipment is at least 10dB lower than the lowest existing background noise level and that prior to first use, the proposed plant/machinery equipment is fitted with anti-vibration isolators and fan motors are vibration isolated from casing, that they would not raise objection to the proposed development. As such the development is considered to be in compliance with Policies D13 and D14 of the London Plan (2021) and Policies CC11 and CC13 of the Local Plan (2018).
- 6.25 With regard to opening hours, the proposal seeks for the self-storage facility to operate on a 24-hour, 7 day a week basis, to provide maximum flexibility to the customers of the proposal. However, Paragraph 5.17 of the submitted Planning Statement outlines that the vast majority of trips to the unit are expected to occur between the hours of 07:00 - 23:30. Officers highlight that whilst the proposed hours of operation would exceed the hours of operation of the majority of the West 12 Shopping Centre, that given the likely low usage of the development in the later quieter hours, means that the development is not likely to result in any detrimental impact upon the amenity of surrounding occupants, with regard to noise nuisance and disturbance.

+ Outlook, light, privacy and a sense of enclosure

6.26 Officers consider that the proposed external alterations are of a scale, massing and siting which ensures that these would mitigate against detrimental harm to neighbouring amenity, with regard to outlook, light, privacy and a sense of enclosure.

6.27 Overall, for the reasons outlined above, officers consider that the proposal would mitigate against detrimental harm to the amenity of both residential occupants and commercial staff/visitors within the locality of the application site, with regard to noise, vibration, outlook, light, privacy and a sense of enclosure. In this respect, the proposal is consistent with Policies D13 and D14 of the London Plan (2021) and Policies CC11, CC13 and TLC5 of the Local Plan (2018).

HIGHWAYS/PARKING

+ Transport assessments/trip generation

6.28 Policy T4 of the London Plan (2021) specifies that when required in accordance with national or local guidance, transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network) at the local, network-wide and strategic level, are fully assessed.

6.29 Policy T2 of the Local Plan (2018) specifies that all development proposals will be assessed for their contribution to traffic generation and their impact on congestion, particularly on bus routes and on the primary route network.

6.30 The application has been supported by a Transport Statement (dated June 2025) prepared by 'The Transportation Consultancy Ltd'. With regard to existing trip generation, the Transport Statement highlights that because the subject basement unit is (currently) vacant, it does not currently generate any trips in its own right.

6.31 With regard to forecast trip generation associated with the proposed self-storage facility (Use Class B8), the Transport Statement highlights that the application site has a Public Transport Accessibility (PTAL) rating of 6b, which indicates excellent public transport accessibility. Figures 2.2 and 2.3 of the Transport Statement provide an isochrone map which shows the accessibility of the site to pedestrians and cyclists within a 2km and 8km radius, respectively. Furthermore, the Transport Statement notes that the application site has access to a number of bus routes within 250m, such as bus routes 31, 49, 72, 94, 95, 148, 207, 220, 228, 237, 260, 272, 283, 295 and 316. Finally, reference is made to the proximity of the application site to Shepherd's Bush Station, which provides services on the London Underground (Central Line), London Overground (Mildmay Line) and National Rail Services (Southern).

6.32 The applicants Transport Statement confirms that the West 12 Shopping Centre provides an existing car park which is open 24-hours a day, 7-days a week. This has a capacity of 178 spaces and is accessible via a ramp from Charecroft Way. Furthermore, it is noted that any customers would also have access to a drop-off point within the existing service yard of the West 12 shopping centre (accessed via Charecroft Way).

6.33 The applicants Transport Statement anticipates that based on the proposed provision of 175 individual storage units, that 131 are likely to be occupied at any one time (based on a 75% industry standard occupancy), and so in a worst-case scenario, based on these figures it is expected that 35 units would be accessed over an entire day. As stated in Section 5.4 of the Transport Statement, it is expected that 52% of trips would be made by public transport, 32% by active travel and the remaining 16% by either car or taxi. If this were applied to the aforementioned daily trip estimates, there is expected to be at most 5-6 trips by vehicle per day. The Transport Statement therefore concludes that this would not give rise to any significant material changes in trips generated during peak hours, or during the course of an entire day for the centre. Highways officers have reviewed the applicants transport statement and consider that the trip generation detailed suggests that trips to the self-storage facility would be infrequent.

+ Vehicle and cycle parking

6.34 Policy T5, Table 10.2 of the London Plan (2021) specifies the following cycle parking standards for use classes B2 - B8:

- 1 long-stay space per 500sqm
- 1 short-stay space per 1,000sqm

6.35 Policy T6 of the London Plan (2021) specifies that car-free development should be starting point for all development proposals in places that are (or are planned to be) well connected by public transport. Car-free development has no general parking but should still provide disabled persons parking. Policy T6.5 of the London Plan (2021) specifies that all non-residential proposals should provide access to at least one on or off-street disabled persons parking bay, with this located on firm and level ground, as close as possible to the building entrance or facility they are associated with.

6.36 Based on the floorspace of the proposed development, the proposal would be required to provide 3 long-stay cycle parking spaces and 2 short-stay cycle parking spaces. The Transport Statement notes that the proposed long-stay cycle parking provision could be met either immediately outside the entrance to the self-storage facility, or alternatively, the long-stay cycle parking provision could be provided in the secure rear service yard. Officers note that a condition requiring further details of the long-stay cycle parking provision has been attached.

- 6.37 The Transport Statement confirms that no short-stay cycle parking is proposed as part of the application, citing the presence of existing on-street cycle parking stands available locally. Officers highlight that there are approximately 26 existing Sheffield stands along the southern elevation of West 12 Shopping Centre, fronting Charecroft Way and 2 existing Sheffield stands located on Richmond Way, to the east of the application site. Based on this, officers are satisfied that the existing level of short-stay cycle parking provision in the locality would be sufficient to meet the short-stay cycle parking requirements of the proposal. No objection would therefore be raised with regard to Policy T5 of the London Plan (2021).
- 6.38 The applicants Transport Statement and Planning Statement notes that customers would have access to a drop-off point within the existing service yard (accessed via Charecroft Way). The applicant has submitted a swept-path analysis which shows the turning manoeuvre and ingress/egress for a delivery van, which would be the largest vehicle customers of the proposed self-storage facility would be expected to utilise. Officers have reviewed the swept-path analysis and have considered that they have demonstrated that these vehicles can enter and exit without impacting on the existing parking spaces within the service yard, or the existing car park on the upper level.

+ Deliveries and servicing

- 6.39 Policy T7 (G) of the London Plan (2021) specifies that development proposals should facilitate safe, clean and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible.
- 6.40 Policy T7 of the Local Plan (2018) specifies that all construction, demolition, utilities and logistical activities within the borough will be required to work with the council in developing the scope and impact of their operations, to ensure the smooth operation of the highway network.
- 6.41 The submitted Transport Statement states that no day-to-day servicing or refuse collection is expected to be required for the self-storage facility. Any maintenance that may be required would utilise small vans and these would make use of the existing rear service yard. Similarly, for refuse collection, refuse could be stored and collected from the service yard in line with the existing collection arrangements for the wider West 12 Shopping Centre.
- 6.42 Overall, for the reasons outlined above, officers are satisfied that the proposal would mitigate against detrimental harm with regard to highway matters, consistent with Policies T4, T5, T6 and T7 of the London Plan (2021) and Policies T2 and T7 of the Local Plan (2018).

FIRE SAFETY

- 6.43 In the interests of fire safety and to ensure the safety of all building users, Policy D12 of the London Plan (2021) states that 'all development proposals must achieve the highest standards of fire safety'. As outlined by Part B of this policy, all major development proposals should be submitted with a fire statement, produced by a third party, suitably qualified assessor.

6.44 The statement should detail how the development proposal will function in terms of:

- 1) The building's construction: methods, products and materials used, including manufacturers' details
- 2) The means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach
- 3) Features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans
- 4) Access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these
- 5) How provision will be made within the curtilage of the site to enable fire appliances to gain access to the building
- 6) Ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.

6.45 The applicant has submitted a Fire Strategy Report (Ref. 7959, REV 2, dated August 2025) prepared by Atelier Ten. The Fire Strategy Report has been prepared by third party, suitably qualified assessors and details how the proposal would meet the criteria set out within Part B of Policy D12. Notably, Paragraph 4.2.1 of the Fire Strategy Report highlights that in addition to the main entrance, the proposed internal fit out would provide three alternative fire exits, which would serve as a means of escape from the basement level to the ground-floor. These are positioned to minimise the possibility of all fire exit routes being unavailable at the same time. There is no change to fire brigade access.

6.46 Furthermore, Paragraph 6.3 of the Fire Strategy Report highlights that whilst the existing building is fitted with an OH3 sprinkler system to BS EN 12845, this would not have been provided in the vacant basement area. Accordingly, the proposed fire strategy would include extending the sprinkler system to cover the subject basement area concerned.

6.47 The Council's Fire Safety Building Control Officer has reviewed the submitted report and notes that the strategy is in line with the approved Building Regulations requirements and consider that the fire safety provisions described in the strategy area suitable and sufficient.

6.48 Officers consider that sufficient information has been submitted to demonstrate how the proposal would address the criteria set out within Policy D12, Part B of the London Plan (2021). As specified within Paragraph 3.12.2 of the London Plan, the matter of fire safety compliance is covered by Part B of the Building Regulations.

ENERGY AND SUSTAINABILITY

- 6.49 The application, relates to the change of use of existing floorspace within the shopping centre. The applicant has submitted an Energy Statement (Ref. 6408, Issue 3, dated October 2025) prepared by T16 Design. The development has limited impacts in terms of energy.
- 6.50 The Council's Environmental Policy team have noted that given the proposed use of the basement unit, no heating or cooling would be necessary and the main energy use would be lighting. The applicants submission has confirmed that low energy lighting will be installed with an automatic on/off occupancy setting. The proposal will not have a stand alone energy generator separate to the existing shopping centre. A carbon off-set calculation is calculated to be £2,052.
- 6.51 Given the above considerations, no objections are raised to the development in terms of energy/sustainability matters.

FLOOD RISK

- 6.52 The application site is located within the Environment Agency's Flood Risk Zone 1, indicating a low risk to flooding from the River Thames. Furthermore, the application site is also in a low-risk area in terms of surface water flooding. The proposed change of use of the basement floorspace from Class E to a self-storage facility (Class B8) would not introduce a vulnerable use onto the site, in terms of flood risk. Additionally, there does not appear to be any routes for sewers to surcharge back into the basement and the structure should already be suitably water-proofed to protect against groundwater ingress. For these reasons, officers raise no objection with regard to Policy CC3 of the Local Plan (2018).

7.0 PLANNING OBLIGATIONS/COMMUNITY INFRASTRUCTURE LEVY (CIL)

+ Mayoral and Local CIL

- 7.1 The Mayor's CIL (Community Infrastructure Levy) came into effect in April 2012 and new fee rates came into effect in April 2019. This would contribute towards the funding of Crossrail. The GLA expect the Council, as the Collecting Authority, to secure the levy in accordance with London Plan Policy DF1. This development is not liable for Mayoral CIL (nil charge).
- 7.2 The Council's Community Infrastructure Levy (CIL) is also a charge levied on the net increase in floorspace arising from development in order to fund infrastructure that is needed to support development in the area. The CIL Charging Schedule was presented to Council and approved 20 May and has formally taken effect since the 1st September 2015. This development is not liable for a local CIL charge.

+ S106 Heads of Terms

- 7.3 The NPPF (2024) provides guidance for local planning authorities in considering the use of planning obligations. It states that 'authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations and that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition'.
- 7.4 London Plan Policy DF1 (Delivery of the Plan and Planning Obligations) states that: "Development proposals should provide the infrastructure and meet the other relevant policy requirements necessary to ensure that they are sustainable and to support delivery of the Plan."
- 7.5 Local Plan Policy INFRA1 (Planning Contributions and Infrastructure Planning) advises that the council will seek planning contributions to ensure the necessary infrastructure to support the Local Plan is delivered using two main mechanisms 'Community Infrastructure Levy (CIL) and Section 106 Agreements (s106).
- 7.6 The planning obligations set out in the heads of terms below are considered necessary to make the development acceptable in planning terms, they are related to the development and fairly and reasonable in scale and kind to the development. A Section 106 agreement is therefore required to ensure the proposal is in accordance with the statutory development plan and to secure the necessary infrastructure to mitigate the needs of the Proposed Development.
- 7.7 In view of the fact the Section 106 agreement will be the subject of extended negotiations, officers consider that circumstances may arise which may result in the need to make minor modifications to the conditions and obligations (which may include the variation, addition, or deletion). Accordingly, the second recommendation has been drafted to authorise the Director of Planning and Property, after consultation with the Assistant Director Legal Services and the Chair of the Planning and Development Control Committee, to authorise the changes they consider necessary and appropriate, within the scope of such delegated authority.
- 7.8 The Applicant is expected to agree to enter into a legal agreement with the Council to which would include the following site-specific items (i.e. items which are not on the CIL r123 list):

Heads of Terms

- 1) A financial contribution of £50,000, towards community safety and public realm
- 2) Support the local area by the provision of discounted storage unit space for local creative businesses and charities (15% of the storage space, at a 30-40% discount for a period of 10 years)
- 3) Carbon Offset payment of £2,052

8.0 CONCLUSION

- 8.1 In considering planning applications, the Local Planning Authority needs to consider the development plan as a whole and planning applications that accord with the development plan should be approved without delay, unless material considerations indicate otherwise and any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 8.2 In summary, the proposed development would introduce a new self-storage facility of 175 individual storage units within a highly sustainable town centre location, via the change of use of part of the currently vacant Class E basement level floorspace. The proposal would not result in the loss of any existing industrial land within London and would be considered of a scale, massing and design which would preserve the character and appearance of the surrounding area, whilst mitigating against detrimental harm to the amenity of surrounding occupants.
- 8.3 Officers have taken account of all the representations received and in overall conclusion for the reasons detailed in this report, it is considered having regard to the development plan as a whole and all other material considerations that planning permission should be granted in line with the recommendations above.

9.0 RECOMMENDATION

- 9.1 Grant permission, subject to the recommendations above.