

# 4D PLANNING™

Chartered Town Planners & Architectural Technicians

## DESIGN AND ACCESS / PLANNING / HERITAGE / STATEMENT

Change of use of basement floor from ancillary commercial space to medical centre, and use of ground floor as pharmacy (overall use of the two floors would be sui-generis as the proposed uses would be connected), alterations to shopfront including metal grill shutter, replacement signage, and two external ac units to rear, and all associated works/

**Property Address:** 240 Edgware Road, W2 1DW.

**February 2024**

## **1.0 INTRODUCTION**

**1.1** This Design and Access / Planning / Heritage Statement is submitted on behalf of the applicant in respect of a planning application for the change of use of the basement floor from ancillary commercial space to medical centre, and use of ground floor as pharmacy, alterations to shopfront including metal grill shutter, replacement signage, and two external ac units to rear. The overall use of the premises would be sui-generis as the proposed uses would be connected. This Statement should be read in conjunction with other drawings and documents accompanying the planning application.

**1.2** This Statement comprises:

- A description of the application properties and surrounding area;
- A description of the proposed development;
- A summary of relevant planning history; and,
- An assessment of the proposed development against relevant planning policy.

## **2.0 APPLICATION PROPERTY AND SURROUNDING AREA**

**2.1** The application relates to the basement and ground floor of No. 240 Edgware Road which is an overall four storey (with accommodation in roof space) terrace building. The overall property is in mixed use.

**2.2** The site is located within a mixed use area. There is a quite a bit of variety in overall building scale and form in the area.

**2.3** The site has a PTAL rating of 6b (best) and thus has excellent access to high frequency public transport. The site is in flood zone 1.

**2.4** The property is not listed. There are however listed buildings in the vicinity. The site is located in-between the Portman Estate Conservation Area and the Bayswater Conservation Area.



*Figure 1 – No. 240 Edgware Road.*

### **3.0 PROPOSED DEVELOPMENT**

**3.1** The proposed change of use comprises:

- Change of use of the basement from ancillary use class E Space to a medical centre.
- Change of use of ground floor from vacant retail premises to a pharmacy.

Both uses would be interconnected internally. The proposed hours of opening are 9am to 10pm Monday to Saturday, and 10am to 10pm on Sunday. There will be two full time and five part time staff employed.

**3.2** There is ample space within the premises for the storage of waste and recycling bins until placement at appropriate locations on collection days. General waste will be collected using standard refuse collection means. A specialist firm will be contracted to collect medical waste.

**3.3** The existing nondescript shopfront is to be replaced with a contemporary one and replacement signage erected. A metal grill shutter is also proposed – this is a necessary security feature given nature of proposed medical and pharmacy use. It is also proposed to replace several pavement glass blocks with paving in order to prevent water ingress to basement level.

**3.4** Two ac units are proposed externally to the rear elevation. The units proposed are:

- 1-Mitsubishi Heavy Industries SCM100ZS-W 945X970X370
- 2-Mitsubishi Heavy Industries FDTC125VNAWPVH 845X970X370

## **4.0 PLANNING HISTORY**

**4.1** There is no recent/relevant planning history for the ground and basement according to Westminster online planning records. Planning permission was granted in the past in the 80s and 90s for extensions, shopfront works, and signage.

## **5.0 PLANNING POLICY**

### **National Planning Policy Framework (2023)**

**5.1** The National Planning Policy Framework 2023 (NPPF) seeks to support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation (para. 86 refers).

*The proposed development is not considered contrary to NPPF policy. The overall area within which the premises sits is a mixed use area and within walking distance of a residential areas and a range of other uses.*

### **London Plan (2021)**

**5.2** Policy SD6 of the new London Plan (2021) recognises the importance of mixed use town centres and supporting continued growth of commercial activity. The traditional high street and town/city centres have been undergoing a transformation for many years. It is widely acknowledged that the future success of high street and town/city centres lies not in retail alone, but rather in service, leisure and mixed uses. Customers want to seek out ‘experiences’ and uniqueness. Flexibility is key. A 2016 Report on Town Centre Investment Zones, prepared by Peter Brett Associates with input from Citicentric and Bond Dickson, found:

*“The retail/leisure/property/investment sectors are agreed that the future of town centres is no longer mainly about shopping. It is more likely to be as much about leisure, living, learning and local services, as well as business”*

*The proposed development would provide a modest size high quality commercial use (comparable to a class E use) and thus would be an improvement on the recent/current situation whereby the premises is vacant. The ground floor pharmacy use would in itself be considered an E use class.*

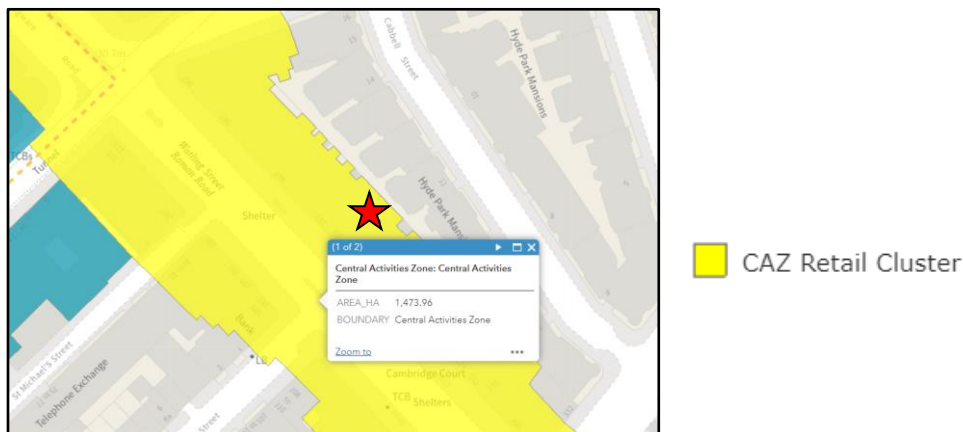
**5.3** Amongst the findings of a recent Royal Town Planning Institute Research Paper (Planning for Post Covid Cities, December 2020) were that:

- Visits to local shops may continue to decline post Covid-19.
- There appears to be general consensus among commenters that there will be ‘no going-back’ to previous shopping habits.
- With reduced face-to-face contacts with family, friends and colleagues, commenters suggested that High Streets could be revitalised as hubs for social interaction.

*The proposed commercial unit would very much align itself with the likely future nature of mixed use urban areas in that traditional retail will be a challenge and there will be more demand for services and experiences. Urban centres are increasingly about social activity and how this is fostered by adjoining businesses. Flexible commercial units are very much aligned with the changing nature of the retail sector. The new E use class provisions recognise the need for properties to change use to reflect changing town centre needs and demands.*

### **Westminster City Plan 2019-2040**

**5.4** As can be seen in Figure 1 below, the site is within a designated CAZ retail cluster. No other designations of relevance apply.



*Figure 1 – Extract from Westminster City Plan Policies Map. Red star denotes approximate location of application flat.*

**5.5** Policy 14 (Town centres, high streets, and the CAZ) is of relevance to the proposal. It states:

*“A. The intensification of town centres, high streets and the CAZ to provide additional floorspace for main town centre uses is supported in principle, subject to impact on townscape and heritage. Proposals in existing town centres and high streets will enhance and diversify their offer as places to shop, work and spend leisure time.*

*B. Uses that provide active frontages and serve visiting members of the public will be required at the ground floor throughout the town centre hierarchy. Uses serving visiting members of the public will also be supported at first floor level within centres characterised by large format, multi-level stores. The use of upper floors for residential use is supported in principle across all parts of the town centre hierarchy except the International Centres.*

*C. All development within the town centre hierarchy will be of a scale, type and format that reflects and enhances the role and function of the centre within which it is proposed.*

...

*3. CAZ Retail Clusters will provide further large format retail and complementary town centre uses to meet the needs of residents, workers, and visitors.*

...

*G. Town centre uses will also be supported in principle throughout the parts of the CAZ with a commercial or mixed-use character, having regard to the existing mix of land uses and neighbourhood plan policies. In the parts of the CAZ that are commercial or mixed-use in character, the loss of town centre uses from the ground floor will be resisted*

...”

***The proposed development would not in any way be contrary to this policy. It would utilise vacant floor space and enhance footfall for the betterment of neighbouring existing commercial uses. The proposed uses are town centre appropriate uses that will serve a significant surrounding residential catchment. An active frontage will be provided for. The area is well served by shopping facilities.***

**5.6** There would be no adverse impacts to neighbouring residential amenity. ***No new building footprint is being created and the works are to all intents and purposes modest and sensitive internal alterations. A Noise Impact Assessment is submitted to accompany the application and concludes that there would be no adverse impact subject to standard type mitigation measures.***

**5.7** Policy 40 (Townscape and Architecture) sets out that ‘*Development will be sensitively designed, having regard to the prevailing scale, heights, character, building lines and plot widths, materials, architectural quality and degree of uniformity in the surrounding townscape*’.

***The proposed new shopfront and associated signage would be in keeping with the significant variety of shopfronts all along Edgware Road. The shopfront would retain a vertical emphasis, and the all glazed nature of it would ensure an active frontage.***

The Westminster *Shopfronts, Blinds and Signs - A Guide to their Design* (2004) acknowledges that security measures are often required and where necessary on open fronted shops, a combination of grill and roller shutter may be acceptable although their use is not encouraged. The nature of the proposed use with necessary storage of drugs etc. on premises is such that a roller shutter is essential. It will however be of grill design to avoid a solid appearance to the street outside of trading hours.

**5.8** Policy 39 of the City Plan (Heritage) is of relevance. It states:

*“...Works to listed buildings will preserve their special interest, relating sensitively to the period and architectural detail of the building and protecting or, where appropriate, restoring original or significant detail and historic fabric...”*

*...Development will preserve or enhance the character and appearance of Westminster’s conservation areas. Features that contribute positively to the significance of conservation areas and their settings will be conserved and opportunities taken to enhance conservation areas and their settings, wherever possible...”*

***The proposal is not considered contrary to this policy. The premises sits outside of two neighbouring conservation areas. The only external changes proposed relate to the shopfront and signage, and the new shopfront and signage proposed would be very much in keeping with the huge variety of shopfront and signage nearby.***

## **6.0 CONCLUSION**

**6.1** The application site is within a mixed use urban area, and within walking distance of day-to-day facilities, services and amenities. The site is accessible and sustainable in terms of access and transport.

**6.2** The proposed development is considered to be in compliance with NPPF policies.

**6.3** The proposal is also considered in compliance with the Westminster City Plan.

**6.4** The proposed development would bring a vacant premises back into use and it is in the interests of proper and sustainable planning to facilitate this.