Chapter 10

TOWN CENTRE AND COMMUNITY USES
10.1. Town centre and community facilities provide the key services that people need. They can include facilities such as shops, cafes, restaurants, public houses, cultural and leisure venues, cinemas, museums and sports centres, hotels, schools, libraries, health centres, places of worship and community centres. Providing convenient access to these facilities is vital to creating lifetime neighbourhoods. The successful spatial distribution, design, delivery and operation of these facilities will ensure access for all members of society, help to reduce the need to travel, supporting transit oriented development, contribute to a layered city and encourage social interaction and leisure activities that improve health and well-being. They can also support place making by creating on-street activity and can enhance the economic prosperity of the area.

Figure 10.1: Bankside, London

10.2. New town centre and community uses should be of a high quality and meet a diverse range of needs. The policies in this chapter set out how OPDC expects this to be achieved.

10.3. This chapter should be read in conjunction with the strategic policies contained within the Strategic Policies chapter (Chapter 3), specifically with Policy SP6 (Places and Destinations), which includes OPDC’s town centre hierarchy and with the places chapter (Chapter 4), which deals with the character of designated town centres and which sets out appropriate clusters for town centre uses.

Town Centre and Community Uses Policies:
• TCC1: Locations for and Impacts of Town Centre Uses;
• TCC2: Vibrancy;
• TCC3: A-Class Uses;
• TCC4: Social Infrastructure;
• TCC5: Culture and Art;
• TCC6: Sports and Leisure;
• TCC7: Public Houses;
• TCC8: Catalyst Uses;
• TCC9: Meanwhile Uses;
• TCC10: Visitor Accommodation; and
• TCC11: Night Time Economy Uses.
POLICY TCC1: Locations for and Impacts of Town Centre Uses

To support, complement and avoid significant adverse impacts to the role and function of OPDC’s designated town centres and the surrounding town centre hierarchy, proposals for town centre uses:

a) will be supported in OPDC’s designated town centres;

b) will be supported outside of designated centres within clusters identified as appropriate for town centre uses in the Places chapter and in accordance with the clusters’ associated policy;

c) will be supported on the edge of or outside of designated centres where the sequential approach to site identification has been applied in accordance with the NPPF sequential test, except for in the Strategic Industrial Location where town centre uses will only be supported where they do not have an unacceptable adverse impact on the functioning of SIL by:

i) providing walk-to services for SIL workers, such as cafes or creches, which demonstrably meet a need for walk-to services within the proposed use class;

ii) being of a small-scale by not exceeding 80sqm of floorspace;

iii) not resulting in the clustering of town centre uses; and

iv) where feasible, supporting the viability of the industrial businesses’ operation;

d) will be supported, where they provide meanwhile space, in accordance with Policy TCC9;

e) should be supported by a Town Centre Uses Statement, where they provide over:

i) 5,000sqm of town centre uses in the Old Oak Major Town Centre; or

ii) 2,500sqm of town centre uses elsewhere;

f) should be supported by an impact assessment in accordance with the NPPF and NPPG, where proposals are providing retail, leisure or office development that exceeds the thresholds in e)i. and ii.; and

g) should contribute, where appropriate, to measures that will support the continuing vitality and viability of Harlesden District Town Centre, when providing town centre uses that exceed the thresholds in e)i. and ii..

POLICY LINKS

- Strategic Policy SP6
- Place Policies P1, P2, P3, P6, P7, P8, P10 and P11
- Design Policies D1 and D2
- Employment Policies E1, E2 and E3
- Town Centres and Community Uses Policies (All)

EVIDENCE BASE LINKS

- Retail and Leisure Needs Study

SUPPORTING TEXT

10.4. OPDC has designated a town centre hierarchy set out in Policy SP6, which focusses town centre uses, which generate high footfall, in accessible locations for those working in, living in and visiting the area. The town centre hierarchy looks to focus town centre uses into four principle locations:

a) a new major town centre in Old Oak; and

b) three neighbourhood centres at North Acton, Park Royal Centre and Atlas Junction.

10.5. Details about the appropriate uses for each of these town centres can be found in the Places chapter (chapter 4). The Places chapter also identifies clusters, focussed at key destinations and on key movement routes. Some of these are within designated town centres and are therefore appropriate for town centre uses. Some clusters have been identified outside of town centres and certain clusters have been identified as being appropriate for smaller scale “walk to” town centre uses. Proposals for town centre uses in these clusters would need to accord with the cluster’s associated policy in the Places chapter (chapter 4).

10.6. OPDC endorses the ‘town centre first’ approach to the development of new town centre uses, as a central component to maintaining the character of successful and diverse centres and optimising accessibility to these uses. However, OPDC recognises the need for flexibility to meet changing needs. It may be appropriate for edge or out of centre town centre uses to help meet the area’s town centre use needs over the next 20 years. This could also include the potential need for temporary or meanwhile space to serve needs in early phases and town centre uses needed to support the construction community, associated with the construction of HS2 and other large schemes in the OPDC area. Where proposals for town centre uses are located outside of a designated centre, OPDC will expect the applicant to demonstrate a sequential approach to site selection, focussing uses firstly on the edge of designated town centres.

10.7. OPDC acknowledges that small-scale walk-to town centre uses can help manufacturing businesses in Park Royal that may wish to sell their produce on their premises, help to serve the needs of workers and help to improve the character and vibrancy of the area. Proposals for this sort of operation will therefore generally be supported, but will be considered against the policy criteria, which seek to ensure that any negative impacts on the transport network are minimised and that they do not have a detrimental impact on the vitality and viability of designated town centres. Any such uses should be small-scale, consisting of no more than 80sqm, which is defined as the threshold for small units in OPDC’s Retail and Leisure Needs Study.

10.8. In early development phases, meanwhile uses will play a critical role in providing services to communities and in place making and proposals for meanwhile town centre uses will be supported, where they accord with the requirements set out in Policy TCC9.
The OPDC area is relatively unique in that the designated town centres at Old Oak, North Acton and Atlas Junction either do not yet exist or are at a very early phase of their development. To ensure that the growth of these centres is carefully managed, OPDC will require development proposals that meet the relevant thresholds to include within their Planning Statement a Town Centre Uses Statement. The Town Centre Uses Statement should include:

a) a vision statement, explaining the rationale and intended market profile of the development, including plans for how it will be presented to the market and its long-term management (for example, there might be a single entity managing the asset in a similar way to Covent Garden, Marylebone High Street or Regent Street). The statement should include (but not be limited to):
   i) evidence on target market;
   ii) details of unit specification (i.e. size, height, depth);
   iii) examples of comparable tenants the scheme will target; and
   iv) planning conditions or obligations being proposed by the applicant; and

b) a masterplan detailing:
   i) the proposed quantum and phasing of town centre uses;
   ii) the proposed spatial distribution and mix of town centre uses;
   iii) how these would relate to the existing and planned town centre uses on adjacent sites; and
   iv) a statement outlining how the proposals would support the wider vision and place making objectives of this Local Plan.

Impact assessments are a national requirement for retail, leisure and office schemes outside of designated town centres. An impact assessment is not usually required within designated town centres but OPDC’s Retail and Leisure Needs Study concludes that given that three out of four of OPDC’s designated centres are either non-existent or in an early phase of their gestation, there is a need for a greater degree of scrutiny of town centre use proposals as they emerge, to ensure that any proposals complement designated centres within OPDC and its wider hinterland. OPDC will require a full impact assessment for those applications that are caught by the relevant threshold in the policy. This should address the requirements of the NPPF and its associated National Planning Practice Guidance (NPPG), specifically, ensuring that the scale of the development is appropriate within the wider hierarchy of centres. Where necessary, impact assessments will need to take into account the cumulative effect of permissions. The assessment will assess the likelihood of a significant adverse impact on the investment within existing centres, and on their vitality and viability, taking into account the health of the existing centres. Any mitigation being proposed by the applicant should be set out clearly.

Harlesden is the closest town centre to the OPDC boundary. The centre is designated as a District Town Centre. OPDC’s Retail and Leisure Needs Study shows that due to its scale and proximity, the centre is likely to be the most impacted by the new town centre hierarchy within the OPDC area. There will be significant opportunities for Harlesden to try and capture trade from the new population and there is also a need to ensure that any risks to the functioning of the centre are appropriately mitigated. To explore and support opportunities for the centre, schemes caught by the relevant threshold will need to engage early with OPDC and the London Borough of Brent to consider, where required, contributions to measures that would potentially support the continuing viability and vitality of the centre. This should include, where relevant:

a) details of how proposed links with Harlesden would be designed, delivered and their timescales; and
b) financial contributions to measures that would mitigate any identified significant adverse impacts to the centre.
Figure 10.3: Local Town Centres
POLICY TCC2: Vibrancy

a) Applications for town centre uses will be supported where they:
   i) maximise the proportion of the ground floor fronting a street as a positive and/or active frontage. Servicing areas and blank façade should be avoided on key routes; and
   ii) support flexibility and adaptability so that uses can expand and/or change between use classes subject to demand and appropriate permissions/agreements;

b) Applications providing outdoor uses such as eating and drinking uses with outdoor seating, event space or street markets will be supported where they do not detract from residential amenity and transport connectivity. Any proposals for event space and/or street markets would need to be accompanied by an appropriate management plan;

c) Applications for new betting shops, pawnbrokers, payday loan stores and games arcades will be supported unless they would result in more than one betting shop, pawnbroker, payday loan store or games arcade within 400m walking distance of the entrance/exit of an existing or permitted primary school; and

d) Applications for new hot food takeaways will be supported where they:
   i) are located outside of 400 metres walking distance of the entrance/exit of an existing or permitted secondary school;
   ii) are located outside of 200 metres walking distance of the entrance/exit of an existing or permitted primary school;
   iii) result in no more than 6% of the units within a designated centre or frontage being hot food takeaway units;
   iv) result in no less than two non A5 units between hot food takeaways; and
   v) operate in compliance with the Healthier Catering Commitment scheme and Government Food Buying Standards for food and catering services.

POLICY LINKS
- Strategic Policies SP3, SP4 and SP6
- Place Policies P1, P2, P3, P6, P7, P8, P10 and P11
- Design Policies D2 and D6
- Employment Policy E2
- Town Centre and Community Uses Policies (All)

EVIDENCE BASE LINKS
- Healthy Town Centres Study
- Retail and Leisure Needs Study

SUPPORTING TEXT

10.12. Town centre uses within the OPDC area will play a critical role in place making. To support this, developers will be expected to maximise the proportion of ground floors of town centre uses fronting onto streets or public spaces that are active, by taking steps to reduce the amount of dead frontage and space given over to building servicing and management such as bin stores and plant. Proposals must ensure that town centre uses are accessible and are designed to the highest quality, considering how proportions, materials and detailing relate to and complement their surroundings, particularly when considering the design of A-class uses in designated town centres.

10.13. Given the scale of development envisaged within the OPDC area and the timescales over which this development is anticipated for delivery, it will be important for proposals to be designed to be sufficiently flexible to allow for changing conditions and needs, in accordance with Policy SP2. OPDC will encourage proposals that allow for flexibility in their size, for example by providing for expansion through the future creation of mezzanines or the subdivision/amalgamation of units. OPDC will also support proposals that, through their design, consider the ability for units to readily change use class. This flexibility should be demonstrated as part of a planning application submission.

10.14. Uses that help to activate the public realm will play an important role in place making. However, the impacts on the amenity of residents and workers would need to be carefully considered. Any proposals for street markets would need to be accompanied by a management plan that identifies its hours of operation and storage arrangements when not in use, types of traders, advertising, servicing and pedestrian and transport impacts. Event spaces will also require a management plan regarding types of events, frequency of use, noise levels, advertising, servicing and pedestrian transport impacts.

10.15. The “Health on the High Street” report published by The Royal Society for Public Health in 2015 provides a range of sources of evidence about the negative health impact of betting shops, payday loan shops, pawnbrokers, games arcades and fast food takeaways and the positive health impacts of health services, pharmacists, leisure centres/health clubs, libraries, museums and art centres and pubs and bars. There has been a growing concern in recent years about the proliferation and over-concentration of betting shops, pay-day loan shops, pawn brokers and amusement arcades and their impacts on mental health and the vibrancy and vitality of town centres. In 2015 Government re-classified betting shops and payday loan shops within a separate use class. OPDC’s Healthy Town Centres Study identifies the impacts that betting shops, pawnbrokers, payday loan stores and games arcades can have on the health and well-being of a community and in accordance with the aspirations for development in the OPDC area to promote healthy and active lifestyles as set out in Policy SP3, OPDC will look to manage these uses.

10.16. OPDC’s Healthy Town Centres Study also identifies the growing concerns about the growth in hot food takeaways (Class A5 uses) and their impact on health, in particular, regarding the proximity of takeaways to schools and the impact that this has on
childhood obesity. The type of food on sale nearest to schools can influence the diet of schoolchildren and the availability of “unhealthy” foodstuffs can make healthier choices less likely. To support the health and wellbeing of communities, OPDC will resist proposals for new takeaways in close proximity of secondary and primary school entrances and will accept the loss of existing takeaways within these areas. In addition, OPDC will resist proposals that would result in the clustering of A5 uses to the detriment of the character and function or vitality and viability of a designated centre. Data will be published as part of OPDC’s Authority Monitoring Report showing the location and proportion of hot food takeaways in town centres.

10.17. The Healthier Catering Commitment is a scheme supporting food businesses in London to offer healthier food options. The scheme promotes a reduction in consumption of fat, salt and sugar and increases in availability of fruit and vegetables and a logo is awarded to those outlets that meet the set criteria. OPDC will condition all permitted applications involving A5 uses to require the operator to achieve, and operate in compliance with, the Healthier Catering Commitment standard. Public Health England’s Food Buying Standards aim at ensuring that food buyers maintain good standards of welfare, nutrition, environmental sustainability and ethics. In accordance with OPDC’s and the Mayor’s Good Growth aspirations, OPDC will condition all A5 uses to ensure operators are complying with these standards.

Figure 10.4: Street Food Market, King’s Cross
POLICY TCC3: A-Class Uses

A-class uses should serve the needs of the area and complement existing town centres. To support this approach OPDC will require:

a) existing A-class uses (except for A4 uses) to be protected, unless:
   i) it is no longer economically viable as demonstrated by accounts data and through competitive marketing for a period of at least 12 months; or
   ii) the facility can be appropriately replaced or provided elsewhere in the locality; or
   iii) the facility is located within Park Royal SIL and exceeds the floorspace threshold in Policy TCC1 c) ii;

b) proposals for new A-class floorspace to have regard to the up to date retail and leisure needs study for the OPDC area including the recommended distribution of A-Class uses across the area;

c) primary shopping areas to comprise of at least 50% A1 (shop) units;

d) the delivery of A-class uses to be phased so that they are delivered in accordance with demand created by the delivery of homes and jobs; and

e) planning applications for A-class uses to provide a mix of unit sizes. Applications including more than 1,000sqm of A-class uses should include at least 10% of floorspace for units of 80sqm or less to support independent/start-up retailers. These should be focussed, where feasible, within secondary retail frontages and applicants should actively market these units within the local communities for a sustained reasonable period prior to letting.

SUPPORTING TEXT

10.18. A-class uses provide vital services to support the needs of communities and include uses such as shops, banks, restaurants and cafes and takeaways. Where existing uses remain viable, OPDC will look to protect existing A-class facilities, or require their replacement within the locality. The requirements for the protection of A4 uses are covered in Policy TCC7.

10.19. OPDC’s Retail and Leisure Needs Study (RLNS) identifies the likely A-class needs to serve those living, working and visiting the OPDC area. The RLNS identifies that upon the completion of development in Old Oak and Park Royal, it is likely that the A-class need will be between 74,300sqm and 90,500sqm of gross floorspace and that the need in the Local Plan period is likely to be approximately 64,500sqm of gross floorspace. A summary table of the requirements over the Local Plan period is provided in Table 10.1. The floorspace calculations balance the needs generated by the development and the requirement to ensure that the existing network of centres can also benefit from spending growth, providing wider benefits to the network of centres.

It should be noted that these figures are estimates, based on current development capacity figures, population projections and estimates of expenditure retention and up to date information should be taken into account in relation to development proposals. Table 10.1 identifies the recommended distribution of this floorspace need over the town centre hierarchy, as a guideline. Subsequent updates to the A-class needs figures will be included in OPDC’s Authority Monitoring Report (AMR).

10.20. It is important to keep concentrations of shops together at the heart of a town centre to make it easy to compare goods between retailers. This critical mass of shops is necessary to encourage shoppers into a centre and to encourage its vitality. Town centres are, however, about more than just shopping. They are preferred locations for other town centre uses, uses which support the area’s function as a place to live and which to work, and uses such as restaurants and bars, which draw people into the centres and encourage them to linger. OPDC will expect primary shopping areas (which can be viewed on OPDC’s Policies Map) to be predominantly made up of retail premises (Use Class A1), but will take a more flexible approach to the delivery of town centre uses outside of these primary shopping areas, in recognition of the diverse and vibrant mix of uses that can help support the vitality of OPDC’s town centre network.

Table 10.1: A-class floorspace requirements during the Local Plan period (Retail and Leisure Needs Study, 2018)

<table>
<thead>
<tr>
<th>Location</th>
<th>A1 retail</th>
<th>A1 service and A2</th>
<th>A3, A4 and A5</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Old Oak Street (including within Old Oak Common Station)</td>
<td>25,600</td>
<td>12,850</td>
<td>15,000</td>
<td>53,450</td>
</tr>
<tr>
<td>North Acton</td>
<td>1,850</td>
<td>1,750</td>
<td>1,000</td>
<td>4,600</td>
</tr>
<tr>
<td>Park Royal Centre</td>
<td>500</td>
<td>1,500</td>
<td>1,000</td>
<td>3,000</td>
</tr>
<tr>
<td>Atlas Junction</td>
<td>1,450</td>
<td>1,000</td>
<td>1,000</td>
<td>3,450</td>
</tr>
<tr>
<td>Total</td>
<td>29,400</td>
<td>17,100</td>
<td>18,000</td>
<td>64,500</td>
</tr>
</tbody>
</table>
10.21. OPDC recognises that these differing roles are served by different parts of the area’s town centres. The primary shopping areas which should provide the critical mass of shops, and the secondary retail frontages, while still containing significant numbers of shops, which contain a greater diversity of town centre uses serving non-shopping needs of visitors and OPDC will take a more flexible approach to the provision of town centre uses in these locations. Taken together, the primary and secondary retail frontages will provide the range of town centre uses necessary to make the area’s centres diverse and successful places.

10.22. In order to complement the surrounding town centre hierarchy and mitigate impacts, A-class uses should be phased in accordance with the provision of homes and jobs. It is recognised that in early development phases, A-class uses can support the activation of the area and place making and OPDC will take a more flexible approach to the phasing of A-class uses when considering these early development sites. This is particularly the case for proposals providing catalyst and/or meanwhile uses. The requirements for these are covered in policies TCC8 and TCC9.

10.23. Within the OPDC area, it will be important to provide a variety of retailers in order to create vibrancy and ensure the long term vitality of its designated centres. OPDC recognises that chain stores are likely to form a key part of the spine of the area’s town centres, but there is a risk that without appropriate interventions to support independents, the area’s town centres could become ‘cloned’ town centres. To support diversity, OPDC will expect A-class proposals to provide for a range of unit sizes for A-class floorspace and as part of major A-class use proposals providing over 1,000sqm, OPDC will require at least 10% of floorspace for units of 80sqm or less (defined in the London Small Shops Study 2010), which will help support the establishment of SMEs and independent retailers in the OPDC area, who tend to operate in smaller units. Locating these on secondary retail frontages will help assist with their affordability.
OPDC will seek to secure a range of high quality social infrastructure facilities for existing and new residents and workers by:

a) protecting existing social infrastructure facilities unless:
   i) the facility would be replaced or reprovided on-site or in an equal or better location to serve local needs and in both cases, to an equivalent or better quantum and quality; or;
   ii) there is demonstrably no longer an identified need for the current use of the facility. In such circumstances, the applicant must provide evidence to demonstrate:
      A) competitive marketing for a period of at least 12 months for alternative forms of social infrastructure without an appropriate offer being received; and
      B) that the loss of the facility would not lead to a shortfall in provision for the specified use for the population that it serves;

b) supporting proposals for new and/or enhanced social infrastructure facilities where:
   i) it can be demonstrated that the facility is meeting needs in the local area; and
   ii) the proposal accords with other relevant planning policies and including the need to achieve homes and non-residential floorspace targets in Site Allocations;

c) securing the delivery of, or contributions towards, enhanced or new social infrastructure facilities to meet the needs arising from development. Social infrastructure facilities should meet the specification requirements outlined in OPDC’s Infrastructure Delivery Plan (IDP), unless otherwise agreed by OPDC and the relevant service provider;

d) locating new social infrastructure:
   i) in locations identified in the Places chapter and/or OPDC’s IDP, unless the on-site facility can be provided on an alternative site, if this is agreed by OPDC and the service provider
and it is shown that the delivery of the facility on an alternative site meets the needs of the development and is deliverable;

ii) in locations that are highly accessible by sustainable forms of travel to the populations that they serve;

iii) health facilities and community facilities within or in close proximity to designated town centres or clusters;

iv) education facilities in areas with good access by foot, cycle and public transport and close to areas of publicly accessible open space; and

v) emergency service facilities with direct access onto unrestricted highways;

vi) requiring high quality design of new or enhanced social infrastructure that:
      i) is accessible and inclusive to all sections of the community;
      ii) adheres to the latest national and regional design guidelines; and
      iii) collocates facilities and uses where appropriate and feasible; and

f) working with service providers and other stakeholders to identify funding sources for the long-term management and maintenance of social infrastructure and where necessary and viable, securing contributions towards this from development proposals.

**POLICY LINKS**
- Strategic Policies SP3, SP4, SP6, SP9 and SP10
- Place Policies P1, P2 and P7
- Design Policy D3
- Delivery and Implementation Policies DI1, DI2 and DI3

**EVIDENCE BASE LINKS**
- Infrastructure Delivery Plan
- Precedents Study
- Social Infrastructure Needs Study
- Sports Courts and Swimming Pools Study

**SUPPORTING TEXT**

10.24. Good quality social infrastructure facilities can have a significant bearing on the quality of life and health and well-being of a community. They encourage social interaction, promote learning and provide support services to those living, working and visiting an area. Figure 10.6 identifies the different types of social infrastructure facilities, which broadly fall into four categories – education, health, community and emergency facilities.

10.25. There are a number of existing social infrastructure facilities within the OPDC area, identified in Figure A1.8 of the Local Plan Appendix. OPDC will look to protect these facilities unless it can be demonstrated that the facility is no longer required through competitive marketing and through there being evidence of sufficient capacity within existing or planned provision, as long as it can be demonstrated that there is sufficient certainty the planned provision will be delivered. Where this is not the case, OPDC will require social infrastructure facilities to be replaced onsite.

10.26. OPDC will work positively with social infrastructure providers wishing to deliver new or expanded facilities that help to meet existing and future needs within the OPDC area and its surrounds. OPDC will also support facilities that better meet the needs of the area’s existing population and will work positively with other local authorities in accordance with the Duty to Cooperate to consider how OPDC can help address wider needs for social infrastructure provision arising from development, where necessary and appropriate and so long as OPDC is able to achieve its homes and jobs targets, particularly in site allocations (see Policy SP10, chapter 3). Given the significant scale of regeneration planned in the area, OPDC has identified a need for a significant amount of new social infrastructure facilities to serve the population arising from development in the area. These requirements are set out in OPDC’s Infrastructure Delivery Plan (IDP).
OPDC is working closely with social infrastructure providers to develop a preferred approach to the delivery of social infrastructure facilities. This includes considerations such as:

a) the merits of enhancing existing social infrastructure facilities in the area versus the provision of new social infrastructure;

b) the potential needs for temporary or meanwhile facilities to serve earlier development phases in advance of the delivery of more permanent facilities;

c) the potential for early development sites to front-load the provision of social infrastructure and/or provide more infrastructure than is needed to meet the needs of the development. This could support early place making. In such circumstances contributions would be secured from future developments or other funding sources and a payback mechanism would be agreed with the developer delivering the facility; and

d) the need for flexibility to respond to the changing requirements of service providers and the needs of people over time.

10.27. The IDP identifies the specific places required to deliver education, health, community and sports and leisure facilities. Development proposals will need to have regard to this and ensure that land required for these facilities is safeguarded in accordance with policy SP10. Where development proposals are having to provide social infrastructure to meet a significantly greater need than that of just their own development, OPDC will look to employ a retrospective pooling contribution mechanism, to provide additional planning contributions towards delivery of the facility from other developments which benefit from the social infrastructure.

10.28. OPDC’s Social Infrastructure Needs Study (2018) outlines the current approach to the provision of education, health, community and emergency service facilities in the OPDC area. The study has calculated needs based on the affordable housing policy and housing mix policy in this Local Plan (Policies H2 and H3, chapter 8) and on the maximum development capacity figures in OPDC’s Development Capacity Study in order to identify the appropriate education, health, community and emergency service infrastructure provision to support the needs of the projected development over the Local Plan period. The study identifies existing schools, health and emergency service facilities that may have the potential for off-site expansion to meet the needs of the development in early phases. Proposals for the expansion of these facilities is not yet committed and OPDC will be working with the relevant service providers to further investigate the potential for these facilities to be expanded. OPDC will secure appropriate contributions from development proposals towards the expansion of any facilities. Applicants should engage early with OPDC and service providers to discuss the potential for any off-site expansion to meet the needs of their development and if off-site expansion proves infeasible, alternative provision would need to be made on-site.

10.29. Given the scale of regeneration and development envisaged, there are also significant needs for the on-site provision of social infrastructure.

10.30. In respect of education, current modelling shows the need for on-site provision of:

a) a 4 form entry (FE) primary school, including early years provision;

b) a 9FE secondary school, including further education provision; and

c) four super nurseries.

10.31. The trigger years for required on-site facilities have been matched against OPDC’s phasing trajectory in order to derive which sites are likely to be being constructed in the year the facility is required, which sites are available for their delivery and which sites are the most appropriate, based on an assessment against a set of criteria. The Social Infrastructure Needs Study identifies that based on current modelling, the primary school should be delivered within the Cargiant site allocation, the secondary school should be delivered within the Acton Wells East site allocation and the four super nurseries should be spread across the OPDC area, with one each in Old Oak South (P1), Old Oak North (P2) and North Acton and Acton Wells (P7) with the location of the fourth nursery to be kept under review.

10.32. In respect of health, the modelling shows the need for 1,564sqm of on-site health facility space within the Local Plan period. The Local Authorities and Clinical Commissioning Groups (CCGs) have confirmed that the preferred approach for the delivery of this floorspace is within one building, which allows the provision of health services at scale and provides for cost efficiencies. The Social Infrastructure Needs Study has assessed the on-site needs for this facility,
TCC4

which shows the need for this facility within the Cargiant site allocation, based on current projections.

10.33. In respect of community space, modelling shows the need for two community hubs, each of 2,600sqm. The community hubs should provide for a variety of community facilities and could include facilities such as public toilets, a community café, faith space, youth space and halls for hire. Current modelling shows that one of these community hubs should be located in Old Oak North (P2) and the other in Old Oak South (P1). The Social Infrastructure Needs Study also identifies a need for on-site emergency service provision - see the IDP for further details. Requirements for sports and leisure facilities are set out in further detail in Policy TCC6.

10.34. It is recognised that the identification of appropriate on-site provision of social infrastructure is based on current assumptions on affordable housing, family housing and on the likely phased delivery and capacity of sites. As development proposals come forward OPDC will gain greater certainty about the required needs for social infrastructure, meaning the requirements for social infrastructure are likely to change over time. OPDC will monitor delivery on an ongoing basis, to ensure that the facilities proposed are the right size to meet needs. Any changes to the size requirements for the social infrastructure outlined above would need to be agreed by OPDC and the relevant service provider.

10.35. Given the timescales over which the plan is proposed and the complexity of delivery, there is a need for a degree of flexibility in the approach to on-site provision of social infrastructure. It is therefore likely that the place specific requirements for education and health facilities in particular will need to be kept under regular review, particularly for facilities identified within later development phases. In recognition of this need for flexibility, on-site facilities may be located on alternative sites if this is agreed by OPDC and service providers. The most up-to-date position on all required social infrastructure provision is set out in OPDC’s IDP.

10.36. Social infrastructure facilities tend to be locations for social interaction and will play an important role in terms of integrating existing and new communities in the area. When planning for the location of new social infrastructure services, consideration needs to be given to how the location of new social infrastructure helps to facilitate this by if feasible, or appropriate, being located in areas where both new and existing communities will be able to access facilities.

10.37. When providing new social infrastructure facilities, OPDC will require that health and community facilities are within or in close proximity to designated town centres, where they will easiest to access. In the case of education facilities, the priority will be to ensure that facilities are located close to publicly accessible open spaces. For early years through to higher education, this will provide opportunities for the potential use of sports and play facilities within open spaces. The University of the Arts London provides a good example of the benefits of providing higher education facilities close to open spaces, having dual benefits both for the space by activating it and for the students, by providing space for leisure and relaxation. For any on-site emergency service provision, the priority should be to locate facilities close to unrestricted highways in order that emergency services are able to respond as quickly as possible to emergencies. Proposals for large-scale social infrastructure that are not required to meet the needs of development and are not included in OPDC’s IDP, would also be considered against the criteria in the catalyst uses policy (see Policy TCC8).

10.38. When providing new or enhancing existing social infrastructure facilities, OPDC will expect the highest standards of design. Facilities should be accessible and should be inclusive and welcoming to people from a wide variety of cultures and ethnicities, in accordance with Policy D3. For many social infrastructure facilities, Central Government publishes design guidelines for their construction, such as Building Bulletins for schools. Proposals will be expected to adhere to these guidelines, as well as any regional guidelines published by the Mayor of London.

10.39. Opportunities to co-locate social infrastructure (placing two or more facilities together to share resources) should be taken where feasible. This can have significant added benefits in terms of making efficient use of space and saving on management and maintenance costs, creating a critical mass in terms of usage and in the case of health facilities and leisure and sports facilities, helping to promote health and wellbeing and provide a community hub.

10.40. Reductions in funding have made it more challenging for service providers to maintain and operate social infrastructure facilities. These costs can in part be reduced through collocating facilities, but OPDC will also need to work closely with service providers to consider appropriate funding sources for both the existing and new community facilities in the OPDC area. This will include innovative approaches to funding such as private sector sponsorship and the community ownership and management of assets (see Policy DI3). Where necessary and feasible, OPDC will also secure planning contributions towards the management and maintenance of facilities from developers.
OPDC will support the provision of a high quality cultural offer in the OPDC area and Cultural Quarter in Old Oak by:

a) protecting existing cultural space unless:
   i) it is no longer economically viable as demonstrated by accounts data and through competitive marketing for a period of at least 12 months for alternative cultural uses without an appropriate offer being received; or
   ii) the facility is replaced or re-provided on-site or elsewhere in the locality to an equivalent or better quantum and quality;

b) supporting applications for new cultural space, where they meet current and/or future identified needs;

c) supporting the retention of existing, and the provision of new, artist studios in accordance with the requirements of policies E1, E2 and E3;

d) securing contributions towards and/or the provision of public art; and

e) requiring schemes providing over 2,500sqm of town centre uses to submit an appropriate Cultural Action Plan.

**POLICY LINKS**
- Strategic Policies SP1, SP5, SP6 and SP9
- Place Policies (All)
- Design Policies D2, D3 and D4
- Employment Policies E1, E2 and E3
- Town Centre and Community Uses Policies (All)
- Delivery and Implementation Policy D1

**EVIDENCE BASE LINKS**
- Cultural Principles
- Future Employment Growth Sectors Study
- Retail and Leisure Needs Study

### SUPPORTING TEXT

10.41. The Mayor’s draft Culture Strategy promotes London as the world’s cultural and arts capital and how this role can help widen the reach of and access to culture and art, support education skills and careers and enhance the physical environment. As London’s largest regeneration project, OPDC can play a central role in delivering new cultural and arts facilities to help consolidate London’s position as a global leader for culture and art.

10.42. OPDC’s Cultural Principles document shows how important culture is to place making and how it can help integrate existing and new communities and provides case study examples of how the provision of culture, particularly in early development phases, can help to shape an area’s identity and can attract businesses, people and investment to an area.

10.43. To support the creation of a high quality cultural area, OPDC will generally be supportive of new cultural facilities and will look to protect existing facilities, where they remain viable.

10.44. Artists contribute to vibrancy, identity and place making and can encourage wider social value through mentoring, work experience, apprenticeships and volunteering opportunities, open studios, public performances/exhibitions, events, festivals, school arts programme or community workshops. OPDC’s Future Employment Growth Sectors Study notes that the OPDC area has a well-established community of artists, which OPDC will look to protect and/or re-incorporate studios within new developments, in accordance with Policies E1 and E2. OPDC will also support the provision of new artist studio space, subject to the policy criteria being satisfied. In accordance with Policy E3, OPDC will look to secure a proportion of low-cost and/or open workspace provision from development proposals.

10.45. Public art can play a particularly important role in early place making, helping to celebrate both the past and future of the area and helping to establish a distinctive character. OPDC will generally support applications for public art, but consideration would have to be given to the impact any proposal has on the legibility of the public realm, that the proposed public art is coordinated across the OPDC area and complements surrounding proposals and that consideration has been given to the longer term maintenance of any installations.

10.46. There are a number of local artists within and close to the OPDC area and developers will be encouraged to work with these artists and with local communities to develop ideas for a wide range of public art projects.

10.47. OPDC’s Cultural Principles document identifies how cultural space can provide valuable facilities for the local area and needs and also help play an important role in continuing London’s position as the globe’s cultural capital. To support this, proposals providing in excess of 2,500sqm of town centre uses will be required to include within their Planning Statement a Cultural Action Plan that sets out how their scheme will contribute to the cultural offer in Old Oak and Park Royal. The Cultural Action Plan should include details such as:

a) the proposed locations for public art – on buildings and within the public realm;

b) proposed activities and projects that will support the creation of a cultural quarter in Old Oak;

c) proposed uses that will help to support culture in the OPDC area;

d) proposed work with local communities and cultural partners;

e) how the developer will engage with artists to help shape their proposal’s design;

f) how the development will support the delivery of the Mayor’s Cultural Infrastructure Plan; and

g) where the development impacts on existing cultural infrastructure, how the developer will accord with the ‘agent of change’ principle (see Policy D6).
OPDC will support the provision of a range of high quality public and private sports and leisure facilities by:

a) protecting existing indoor and outdoor sports and leisure facilities, including playing fields unless:
   i) the facility is surplus to requirements, evidenced by an up-to-date and robust assessment showing other facilities in the local area that can demonstrateably meet needs if the facility is lost, in terms of their capacity, access, quality, function and affordability; or
   ii) the facility can be appropriately replaced or provided in an equal or better location and to an equal or better quantum, quality and range of sport and leisure functions to serve needs; or
   iii) the development is for an alternative sports and leisure facility, the identified needs for which outweigh the loss and whose quantum, quality and function demonstrably meet or exceed the provision within the existing facility;

b) supporting enhancements to existing indoor and outdoor sports and leisure facilities and the provision of new facilities, where the proposal:
   i) meets current and/or future identified needs; and
   ii) achieves the “Inclusive Fitness Initiative Mark” accreditation;

c) requiring proposals to contribute towards and/or deliver public access and affordable indoor and outdoor sports and leisure facilities, including playing pitches, that:
   i) provides public access for all ages;
   ii) provides appropriate concessions access;
   iii) ensures that 1 sports court is provided for every 3,200 residents and 1sqm of swimming pool space is provided for every 90 residents; and
   iv) delivers new public sports and leisure centres in locations identified in the Infrastructure Delivery Plan (IDP).

EVIDENCE BASE LINKS
- Infrastructure Delivery Plan
- Precedents Study
- Sports Courts and Swimming Pools Study

SUPPORTING TEXT

10.48. Sports and leisure are vital facilities for promoting people’s health and well-being, helping people to live active lifestyles and de-stress. OPDC is keen for the Old Oak and Park Royal area to be well served by a range of facilities, to support the needs of those living and working in the area. Applications for the loss of existing facilities will normally be refused unless one or more of the policy criteria in part a) can be satisfied. Assessments justifying the loss of a facility should form part of applicant’s Planning Statements and should accord with Sport England’s Playing Pitch and Assessing Needs and Opportunities Guidance.

10.49. Applications for the enhancement of existing facilities and provision of new facilities will generally be supported, subject to them being designed to a high quality and not giving rise to unacceptable impacts on amenity and on the transport network and public realm. The English Federation of Disability Sports’ Inclusive Fitness Initiative (IFI) has been established for over 10 years, supporting leisure centres to become more welcoming and accessible environments to disabled people. Facilities across the country have been awarded the ‘IFI Mark’ accreditation, which helps leisure facilities to get more disabled people physically active.

10.50. Sports and leisure facilities are likely to be privately operated and run. OPDC recognises the role these private facilities can play in meeting needs. However, it will also be important to secure affordable concessions access to sport and leisure facilities, particularly for those on lower incomes and for families with young people and children, who are often restricted from accessing private facilities. Specific large-scale public access facilities should be provided in the locations identified in OPDC’s Infrastructure Delivery Plan (IDP). Fulham Pools (figure 11.2) provides a good example of such a facility, which is run by a commercial operator with private membership and certain members only facilities, but also provides public access for all ages and affordable concessions access to the swimming pool, gym, all weather courts and other ancillary facilities.

10.51. As part of the provision of these concessions access facilities, particular consideration will be given to the need to secure access to public and affordable sports courts and swimming pools. Evidence\(^1\) has identified deficiencies in access to sports courts in the OPDC area. This identified that a population increase of 3,200 would generate a demand for one additional sports court (the size of a badminton court). Current projections estimate that development is likely to generate an additional population of approximately 60,000 residents, giving rise to the need for an additional 19 sports courts in the area. The OPDC area is deficient in access to public swimming pools. The Sport Courts and Swimming Pools Study has identified that approximately 90 people gives rise to the need for 1sqm of pool space. Based on current population projections, this would result in a need for gives rise to an approximate need for 650sqm of public pool space during the plan period, which would equate to approximately two 12x25m pools or one 50x12m pool.

10.52. OPDC will also support applications for and secure the delivery of and/or contributions towards outdoor sports and leisure facilities including playing pitches, that serve needs and provide public and affordable access.

REFERENCES
1. Sports Courts and Swimming Pools Study
POLICY TCC7: Public Houses

OPDC will support the loss of public houses where:

a) the public house has been competitively marketed:
   i) for 24 months as a public house and for an alternative local community facility;
   ii) at an appropriate price following independent valuation;
   iii) in appropriate publications and through specialised licensed trade agents;
   iv) in a condition that allows the premises to continue operating as a pub or as a community facility; and
   v) with no interest in either the freehold or leasehold either as a public house or as a community facility falling within the ‘D1’ use class;

b) an assessment has been made of alternative licensed premises within easy walking distance of the public house and premises are identified which offer similar facilities and a similar community environment to the public house which is the subject of the application;

c) the proposed alternative use will not detrimentally affect the character and vitality of the area and will, where appropriate, retain as much of the building’s defining external fabric and appearance as a pub as possible; and

d) there has been public consultation to ascertain the value of the public house to the local community and the proposal does not demonstrably constitute the loss of a service of particular value to the local community.

SUPPORTING TEXT

10.53. Public houses act as hubs for community life, and are important for mental health and well-being. They provide a social space and promote community cohesion, provide economic benefits by providing jobs, support local food suppliers, bringing activity to town centres and can also provide heritage value. Within the OPDC area there are currently three public houses:

   a) The Castle, North Acton;
   b) The Fisherman’s Arms, Old Oak Lane; and
   c) The Grand Junction Arms, Acton Lane.

10.54. OPDC’s Heritage Strategy identifies all three facilities as being of important heritage value and OPDC are proposing that they are locally listed.

Figure 10.7: Grand Junction Arms

10.55. There has been growing concern about the loss of public houses in the UK and OPDC will seek to retain such premises, unless all the policy criteria can be satisfied. OPDC’s policy requirements accord with the Campaign for Real Ale (CAMRA) guidance. The competitive marketing requirements for public houses are longer than for other town centre uses in recognition of the smaller number of public house operators and as a consequence, the need for a longer marketing period to identify an appropriate operator.
POLICY TCC8: Catalyst Uses

SUPPORTING TEXT

10.56. Regeneration of the OPDC area and in particular Old Oak will result in large-scale development of brownfield land in a location that will be well connected. This is likely to make the area suitable for a number of larger scale destination or catalyst uses.

10.57. These sorts of uses, if planned well, can help to stimulate significant and positive change, helping to support economic growth, increase market confidence and create a recognisable identity. OPDC defines these uses as catalyst uses. Catalyst uses tend to broadly fall into four categories:

a) Sports stadia and facilities;
b) Retail and leisure;
c) Culture, education and health; and
d) Business and conference space.

10.58. King’s Cross and Stratford provide two recent examples in London of how these sorts of uses can catalyse and shape the identity of major regeneration projects. In King’s Cross, the University of the Arts London and Francis Crick Institute have helped to create a vibrant district centred around the education, health and culture sectors. In Stratford, a wider range of uses includes the Olympic legacy venues, Westfield Stratford, Here East and the future planned Cultural and Education District.

10.59. OPDC’s Catalyst Uses Study notes that the scale of opportunity at Old Oak and Park Royal will allow differing character areas to emerge. The different areas could house multiple and complementary catalyst uses. It will be important to ensure these uses support the wider regeneration aspirations for the area, as set out in OPDC’s spatial vision, strategic policies and place policies.

10.60. Catalyst uses can be small, medium and large-scale. OPDC’s Catalyst Uses Study identifies that small facilities could be readily incorporated in development plots and are unlikely to have a significant impact on OPDC’s ability to achieve its homes and jobs targets. These facilities would still need to be considered in accordance with other Local Plan policies. However, larger facilities, defined as being of over 10,000sqm of floorspace and/or 0.25 hectares of land, are likely to have a more significant impact on homes and jobs targets and on shaping the identity of the OPDC area and therefore merit greater scrutiny. To support this, the Catalyst Uses Study identifies a set of qualitative and quantitative criteria, against which these larger facilities should be assessed, in order to ensure that the facilities complement the wider regeneration of the area. These criteria are set out in Table 10.2.

10.61. The five strategic objectives in Table 10.2 set out OPDC’s key ambitions and expectations for any proposed catalyst in the OPDC area. More details on the expectations in relation to the five strategic objectives can be found in OPDC’s Catalyst Uses Study. For the qualitative criteria, the applicant’s Catalyst Uses Statement should demonstrate how the proposal supports these objectives. For the quantitative criteria, the Statement should assess the scheme against relevant comparable proposals identified in OPDC’s Catalyst Uses Study and against other projects comparable to the proposed catalyst, which could be from London, the UK or overseas. These comparable projects should be discussed and agreed with OPDC prior to the submission of the Statement. Catalyst Uses Statements would not be required for facilities identified in OPDC’s IDP, which are necessary to meet the needs of development, such as a school or primary care centre.
<table>
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<tr>
<th>Objective</th>
<th>Qualitative Criteria</th>
<th>Quantitative Criteria</th>
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<tbody>
<tr>
<td>Part of a holistic offer</td>
<td>• It supports the delivery of the spatial vision and strategic policies;</td>
<td>• It does not impact on the delivery of OPDC’s housing targets;</td>
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<td></td>
<td>• It complements other existing or planned catalysts and surrounding uses;</td>
<td>• It does not have a negative impact on land values of adjacent uses;</td>
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<td></td>
<td>• It does not inhibit development on surrounding sites; and</td>
<td>• It contributes to the quantum, quality and design of public realm and open space;</td>
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<td></td>
<td>• It supports place making and identity.</td>
<td>• It optimises the number of hours/days the catalyst is utilised per annum; and</td>
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<td></td>
<td></td>
<td>• It optimises the proportion of active and/or positive frontage.</td>
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<tr>
<td>Financially sustainable</td>
<td>• It is financially deliverable;</td>
<td>• It is supported by appropriate capital and revenue expenditure on the facility and identified funding sources;</td>
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<td></td>
<td>• It does not negatively impact on the viability of the surrounding area, in terms of affordable housing delivery and infrastructure requirements;</td>
<td>• The catalyst does not have unacceptable requirements for infrastructure to the detriment of securing funding and financing for other priority infrastructure; and</td>
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<td></td>
<td>• Arrangements are in place for its long term stewardship and management; and</td>
<td>• The proposed catalyst provides appropriate contributions towards the costs of infrastructure requirements to support catalyst use.</td>
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<td></td>
<td>• It helps to leverage investment.</td>
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<tr>
<td>Complements wider environment</td>
<td>• It complements London and West London’s needs and growth aspirations;</td>
<td>• It optimises total direct and indirect jobs;</td>
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<td></td>
<td>• It complements the local characteristics and meets the needs of and provides benefits for the local population; and</td>
<td>• It optimises full time equivalent (FTE) jobs;</td>
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<td></td>
<td>• It adds value to local economic activity</td>
<td>• It has a high overall Gross Value Added (GVA) and average GVA per employee;</td>
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<td></td>
<td></td>
<td>• It optimises direct, indirect and FTE jobs per hectare;</td>
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<td></td>
<td></td>
<td>• It provides a range of direct, indirect and FTE jobs by sector and skills level; and</td>
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<td></td>
<td>• It supports the delivery of additional (non-displacement) jobs within:</td>
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<td>» the OPDC area;</td>
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<td></td>
<td></td>
<td>» the boroughs of Brent, Ealing and Hammersmith and Fulham; and</td>
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<td></td>
<td></td>
<td>» Greater London.</td>
</tr>
<tr>
<td>Generates or sustains momentum</td>
<td>• It helps to kick-start and/or sustain development, investment and awareness.</td>
<td>• It scores positively when compared against other comparable examples of other catalysts and statistical evidence of their impact on development, investment and awareness.</td>
</tr>
<tr>
<td>Leverages HS2 and the Elizabeth Line</td>
<td>• It capitalises on the connectivity, identity and the large number of people that will be brought to the area by the planned HS2 and Elizabeth Line station.</td>
<td>• It optimises net additional Gross Value Added (GVA) to London and the UK; and</td>
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<td></td>
<td></td>
<td>• It optimises footfall per annum.</td>
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10.62. The value of meanwhile uses has been recognised across the property and regeneration industry, not least as a strategy for enabling early delivery of longer-term regeneration and development proposals. Meanwhile uses provide the opportunity for early wins by quickly bringing life and activity to an area before permanent development begins and enabling a period of testing project ideas and establishing uses, which will ultimately inform the final scheme brief and design.

10.63. Meanwhile uses are likely to play a huge role in early place making in the OPDC area, particularly in Old Oak, where there will be many temporarily vacant land parcels awaiting development in the longer term and where meanwhile uses can help provide facilities to support its designation as a Cultural Quarter (see Policy SP6).

10.64. OPDC will be generally supportive of meanwhile uses. However, it will be important to ensure that any meanwhile use does not result in an unacceptable impact on residential amenity and that the uses do not prevent development sites from being brought forward for development in a timely fashion. Ideally meanwhile uses would occupy spaces which are available for at least five years, in order to offset the start-up costs and establish viable businesses or organisations.

10.65. Through occupying temporary land or buildings, meanwhile uses can be low cost and low-risk, making them attractive to business start-ups, community groups and the creative and cultural sectors. To support these, OPDC will work with developers to secure appropriate arrangements that could support occupiers of meanwhile spaces to secure space within permanent structures. Further details on the requirements for this are outlined under the requirements for the Meanwhile Strategy below.

10.66. All major development proposals will be required to produce a Meanwhile Feasibility Study, which should be included within an applicant’s Planning Statement. The Study should identify whether the land or buildings affected by the development proposal are appropriate for meanwhile activities. This should:

a) clearly set out the proposed phasing of the site and the points at which land and/or buildings are likely to be vacant;

b) identify other opportunities and constraints to the provision of meanwhile facilities; and

c) make clear recommendations on the appropriateness of land and/or buildings on the site for different meanwhile uses, including but not limited to business space, retail, eating and drinking establishments, leisure, culture and sports space, public art and open space.

10.67. If appropriate for meanwhile activities, OPDC will secure a Meanwhile Strategy through a planning condition or Section 106 agreement, which should identify the proposed steps to promote meanwhile activities on the site. This should identify:

a) the types of meanwhile uses considered most appropriate for the site and how these can meet needs and support regeneration, early place making and the longer term success of the development;

b) the proposed approach to how these meanwhile uses would be taken forward, including details on timescales, phasing and how the proposal would complement surrounding developments and the longer-term place making vision for the area;

c) the proposed approaches to engaging with potential occupiers of the meanwhile space. This should focus on looking to incentivise business start-ups and local businesses and organisations to occupy spaces; and

d) the proposed approaches to enable meanwhile uses to occupy the permanent structures in the development. This could include providing business support, staggered rental rates and offering right of first refusal.
OPDC will contribute to London’s visitor infrastructure and London’s overall need for hotel bedspaces by:

a) supporting proposals for new and expansions to existing visitor accommodation where they:
   i) are located in accordance with the NPPF sequential test and close to public transport, in particular rail stations, and do not give rise to unacceptable impacts on the transport network;
   ii) are accompanied by an appropriate management plan;
   iii) provide at least 10% of hotel bedrooms as wheelchair accessible and submit Accessibility Management Plans;
   iv) are not permanently occupied; and
   v) do not compromise the delivery of housing targets and support the delivery of job targets, particularly within Site Allocations.

b) supporting a range of types of visitor accommodation over a range of affordability;

and

c) supporting the provision of business hotels and multi-functional convention facilities.

SUPPORTING TEXT

10.68. The London Plan identifies a London-wide need for an additional 58,000 hotel bedrooms by 2041. Due to the OPDC area’s high public transport accessibility providing access to London at the rest of the UK, as well as its proximity to destinations such as the West End and Heathrow, it is likely to be an attractive location for visitor accommodation. To minimise impacts on residential amenity and to reduce reliance on private cars, the location of visitor accommodation should be delivered in accordance with the sequential test set out in the NPPF and should be located in areas with good access to public transport, in particular rail stations. OPDC will be particularly supportive of hotels close to the new Old Oak Common rail station and the potential for these to meet the need for more business hotels (see Policy P1).

10.69. OPDC will also require developers to demonstrate that proposals do not have a detrimental impact on the amenity of neighbours, particularly residents and will require developers to submit management plans, secured through a Section 106 agreement, demonstrating how potential impacts will be minimised and mitigated against.

10.70. Conditions will be applied to ensure that any hotel space is not permanently occupied. Hotel accommodation does not contribute to OPDC’s housing supply, so as part of the determination of applications, OPDC will consider whether the proposal impacts on the ability of OPDC to achieve its housing target, particularly if the proposal is within OPDC’s Site Allocations (see chapter 4).

10.71. Applicants will be required to provide at least 10% accessible hotel bedspaces to meet the needs of disabled guests. Accessibility Management Plans should commit to providing an enhanced level of customer care to disabled guests and, at the same time, optimise the use of the accessible rooms.

10.72. OPDC will welcome proposals over a wide range of affordabilities, from high end 5* hotels down to value and budget hotels in order that a wide variety of tourists will be attracted to the area and to London.

10.73. There is a particular need in London for high quality business visitor accommodation and the Old Oak area will be particularly well suited to providing for this need with good connections to Heathrow, Gatwick, Central London and the north of England. Business accommodation should include provision for conference facilities and in large hotels, convention centre facilities, for which there is currently an undersupply in west London.

10.74. Providing high quality facilities is essential as the quality of hotel accommodation often shapes visitors’ perceptions of the capital and encourages recommendations and/or repeat visits. OPDC will encourage developers to join national quality assurances such as VisitEngland’s National Quality Assessment Scheme.
POLICY TCC11: Night Time Economy

SUPPORING TEXT

10.75. The night-time economy is worth £26.3 billion a year to the London economy and is part of the reason that London is an attractive place to live, work and visit. Town centre uses such as eating and drinking establishments and culture, sports and leisure uses can play a key role in contributing to the vibrancy and vitality of the OPDC area alongside adding activity to the public realm and supporting the local economy. The Mayor of London has published a 24 hour vision for London, which sets out the ambition for the capital to become a trailblazing city at night, competing with the likes of Berlin, Tokyo and New York. The Mayor’s Culture and Night Time Economy Supplementary Planning Guidance (SPG) (2017) identifies that to support the Mayor’s 24 hour vision opportunities should be taken to extend the opening hours of activities and uses. This could include more traditional night time economy uses such as eating and drinking establishments, alongside uses usually associated with the day time, such as shops, cafes, recreational, community and leisure facilities, helping to create a ‘bridge’ between day time and night time economy uses.

10.76. OPDC will work with applicants to support the delivery of these uses in the OPDC area. However, if not appropriately mitigated, these uses can result in night-time activity which can give rise to impacts on amenity, particularly for residents.

10.77. OPDC will look to apply the ‘agent of change’ principle to appropriately manage the impacts of late night premises (see Policy D6).

10.78. When a town centre use is the ‘agent of change’, OPDC will look to condition planning permissions. Proposals for late licences will be assessed in terms of the use’s impact on residential amenity and will consider issues such as noise within the premises, smells, light pollution and the impact of those going to and from the facility, such as traffic, car parking and anti-social behaviour.

10.79. Conversely, under ‘agent of change’ principles, if a town centre use is in place before a residential development, as the ‘agent of change’, the residential development is responsible for mitigating against potential residents’ complaints, licensing restrictions or the threat of closure. Residential uses within or close to town centre locations, where there is potential for late night activities, should carefully consider the locations of habitable rooms and in particular bedrooms. They should also clearly demonstrate how noise attenuation measures have been included and designed to the highest standards. This approach is necessary to ensure both a vibrant night-time economy and high quality residential environment.

10.80. As part of mixed use proposals, OPDC will look to ensure that any proposed town centre use is appropriately mitigating its impacts on any residential use. Appropriate mitigation will include the use of planning conditions limiting the hours of operation. Any proposed residential units within mixed use proposals would also need to be designed so that they are mitigating potential impacts arising from town centre uses.